



No. C965349  
Vancouver Registry

In the Supreme Court of British Columbia

Between

Anita Endean, as Representative Plaintiff

Plaintiff

and

The Canadian Red Cross Society, Her Majesty the Queen in right of the Province of British  
Columbia, and The Attorney General of Canada

Defendants

Prince George Regional Hospital, Dr. William Galliford,  
Dr. Robert Hart Dykes, Dr. Peter Houghton,  
Dr. John Doe, Her Majesty the Queen in right of Canada,  
And Her Majesty the Queen in right of the Province of British Columbia

Third Parties

**APPLICATION RESPONSE**  
**Re UNALLOCATED FUNDS**

**Application response of:** Her Majesty the Queen in right of the Province of British Columbia  
(the “defendant and third party”)

THIS IS A RESPONSE TO the notice of application of the British Columbia Joint Committee  
Member filed December 2, 2015.

**Part 1: ORDERS CONSENTED TO**

The application respondent consents to the granting of the orders set out in the following  
paragraphs of Part 1 of the notice of application on the following terms: NONE

**Part 2: ORDERS OPPOSED**

The application respondent opposes the granting of the orders set out in paragraphs 3 through 8 of Part 1 of the notice of application.

**Part 3: ORDERS ON WHICH NO POSITION IS TAKEN**

The application respondent takes no position on the granting of the orders set out in paragraphs 1 and 2 of Part 1 of the notice of application.

**Part 4: FACTUAL BASIS**

1. The facts as listed by the applicant and to be listed by the respondent The Attorney General of Canada

**Part 5: LEGAL BASIS**

1. Reasons for Judgment of the Honourable Chief Justice Hinkson, BCSC 2014 621
2. Such further and other grounds as counsel may advise and this Honourable Court may permit.

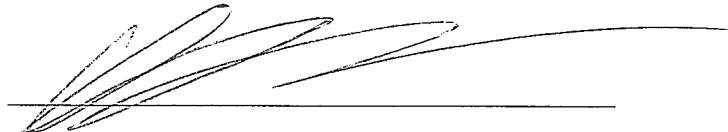
**Part 6: MATERIAL TO BE RELIED ON**

1. Reasons for Judgment of the Honourable Chief Justice Hinkson, BCSC 2014 621
2. The pleadings and proceedings herein and such further and other materials as counsel may advise and this Honourable Court may permit.

The application respondent estimates that the application will take 3 days.

The application respondent has filed in this proceeding a document that contains the application respondent's address for service.

Date: January 28, 2016



D. Clifton Prowse, Q.C., counsel for the defendant and third party, Her Majesty the Queen in right of the Province of British Columbia