



FORM 66 (Rule 16-1 (2))

Court File No. **VLC-S-S-258133**

Court File No.
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

X CORP.

Petitioner

AND:

JESSICA SIMPSON¹

Respondent

PETITION TO THE COURT

ON NOTICE TO:

Jessica Simpson (Respondent/Applicant in the proceedings below)
jessica@simpsonlitigation.com

Civil Resolution Tribunal
c/o Zara Rahman and Eliza McCullum
PO Box 9239 Stn Prov Govt
Victoria, BC V8W 9J1
zara.rahman@crtbc.ca
eliza.mccullum@crtbc.ca

Ministry of Attorney General
Legal Services Branch
PO Box 9290 Stn Prov Govt
1001 Douglas Street, Victoria, BC V8W 9J7

The address of the registry is:
Vancouver Registry
800 Smithe Street
Vancouver, BC V6Z 2E1

¹ The Petitioner filed a Notice of Application to Commence Proceedings Anonymously on November 3, 2025. Additionally, the Civil Resolution Tribunal issued non-publication orders under ss. 5(9) and 13 of the *Intimate Images Protection Act* banning the publication of the Respondent's name or anything that would identify her.

This matter is an application for judicial review.

This proceeding is brought for the relief set out in Part 1 below by

- ☒ the person named as petitioner in the style of proceedings above.
☐ _____ (the petitioner)

If you intend to respond to this petition, you or your lawyer must

- (a) file a response to petition in Form 67 in the above-named registry of this court within the time for Response to Petition described below, and
- (b) serve on the petitioner
 - (i) 2 copies of the filed Response to Petition, and
 - (ii) 2 copies of each filed Affidavit on which you intend to rely at the hearing.

Orders, including orders granting the relief claimed, may be made against you, without any further notice to you, if you fail to file the response to petition within the time for response.

Time for Response to Petition

A response to petition must be filed and served on the petitioner,

- (a) if you were served with the petition anywhere in Canada, within 21 days after that service,
- (b) if you were served with the petition anywhere in the United States of America, within 35 days after that service,
- (c) if you were served with the petition anywhere else, within 49 days after that service, or
- (d) if the time for response has been set by order of the court, within that time.

(1)	The ADDRESS FOR SERVICE of the petitioner is: c/o Andrew Bernstein Torys LLP 79 Wellington St. W., 30th Floor Box 270, TD South Tower Toronto, ON M5K 1N2 Fax number address for service (if any) of the petitioner: 416.865.7380 E-mail address for service (if any) of the petitioner: abernstein@torys.com
(2)	The name and office address of the petitioner's lawyer is: Andrew Bernstein Torys LLP 79 Wellington St. W., 30th Floor Box 270, TD South Tower Toronto, ON M5K 1N2

CLAIM OF THE PETITIONER

Part 1: ORDERS SOUGHT

1. The Petitioner seeks the following relief:
 - (a) An order quashing the Administrative Penalty Decision of the Civil Resolution Tribunal in *Re X Corp.*, 2025 BCCRT 1228, issued September 4, 2025 (IS-2-2025-003711);
 - (b) An order substituting the Administrative Penalty Decision with a decision from this Court finding that X Corp. complied or made reasonable efforts to comply with the Protection Order; or
 - (c) In the alternative to the order requested at (b), an order remitting the matter for reconsideration by the Civil Resolution Tribunal in accordance with the directions this Court provides pursuant to section 5 of the *Judicial Review Procedure Act*, R.S.B.C. 1996, c. 241;
 - (d) To the extent necessary, an order amending the Protection Order at paragraph 56(e) of the Civil Resolution Tribunal's Protection Order Decision re-issued May 26, 2025 (File: IS-1-2025-000905) [unpublished] to specify that the Protection Order applies only in the province of British Columbia;
 - (e) In the event that the Civil Resolution Tribunal does not voluntarily produce the dispute file for the underlying proceedings, an order directing the Civil Resolution Tribunal to disclose the record of proceedings below; and
 - (f) Such further or other relief as this Honourable Court may consider just.

Part 2: OVERVIEW & FACTUAL BASIS

Overview

2. This is a judicial review from the order of the Civil Resolution Tribunal, made under the *Intimate Images Protection Act*.
3. The Tribunal ordered X Corp. to remove an image from its service, X, on the ground that it violated British Columbia law. X Corp. complied with the order by making the image unavailable in Canada. The Tribunal concluded that this was insufficient, demanded the global deletion of the image, and levied the maximum penalty under the *Act* against X Corp.
4. The problem with the Tribunal's decision is that it incorrectly orders global blocking, contrary to Canada's Constitution and principles of international comity. X Corp. applies for judicial review of the Administrative Penalty Decision because it was based on a legal error.

5. The Respondent is located in Canada and was aggrieved by the alleged image being accessible in Canada. The Respondent provided no evidence of third parties accessing the image either in British Columbia or Canada (or elsewhere) on X after X Corp. blocked it in Canada. It is common for an online platform to use geo-blocking measures to block access to content in specific countries based on their local laws. By contrast, globally deleting content would require deleting the information from X Corp.'s servers in the United States.

6. The Tribunal's decision also exceeds the scope of the governing legislation because the *Intimate Images Protection Act*, and the Tribunal's enabling statute, the *Civil Resolution Tribunal Act*, are British Columbia laws and do not extend to other countries.

7. The Decision must also be set aside because X Corp. had complied with the Protection Order by geo-blocking the image in Canada. X Corp. therefore requests that this Court quash the Administrative Penalty Decision.

The Parties

8. X Corp. is an American entity headquartered in Texas and operates the online platform "X". X Corp. does not have offices, or facilities (including servers or data centers) in Canada.

9. The Respondent ("TR") is a transgender person residing in British Columbia.²

The IIPA

10. The *Intimate Images Protection Act*, S.B.C. 2023, c. 11 (IIPA) was enacted by the legislature of British Columbia to provide relief to individuals depicted in "intimate images" distributed without their consent. Section 5 authorizes the Civil Resolution Tribunal (CRT) (and this Court) to grant expedited protection orders to remove such images.

11. The IIPA defines an "intimate image" as:

[A] visual recording or visual simultaneous representation of an individual, whether or not the individual is identifiable and whether or not the image has been altered in any way, in which the individual is or is depicted as

- (a) engaging in a sexual act,
- (b) nude or nearly nude, or
- (c) exposing the individual's genital organs, anal region or breasts,

² TR are the initials the Vice Chair used in the Administrative Penalty Decision to identify the Respondent.

and in relation to which the individual had a reasonable expectation of privacy at,

- (d) in the case of a recording, the time the recording was made and, if distributed, the time of the distribution, and
- (e) in the case of a simultaneous representation, the time the simultaneous representation occurred[.]

12. Section 16 of the IIPA provides that the CRT “may order a person to pay an administrative penalty if (a) the tribunal determines that the person has failed to comply with an order made under section 5, and (b) the person is given an opportunity to be heard in relation to the administrative penalty before the administrative penalty is ordered.”³

13. Under s. 12 of the IIPA, “[a]n internet intermediary is not liable under section 5 ... if the internet intermediary has taken reasonable steps to address the unlawful distribution of intimate images in the use of its services.” An “internet intermediary” is defined at s. 1 of the IIPA as “an organization that hosts or indexes third party content through an online platform”.

14. Section 9 of the Intimate Images Protection Regulation, B.C. Reg. 293/2023 (IIPR) sets a \$5000 cap on administrative penalties that may be ordered against an internet intermediary for each day that the internet intermediary fails to comply with a protection order, up to a total maximum of \$100,000.

15. The CRT’s decisions can be judicially reviewed subject to the requirements in Part 5.1 of the *Civil Resolution Tribunal Act*, S.B.C. 2012, c. 25 (CRTA).

The Protection Order

16. TR applied to the CRT for a protection order under s. 5 of the IIPA pertaining to three images: the “altered image”, the “genitals image” and the “blurred image”. On March 28, 2025, Vice Chair Regehr granted a general protection order over the “altered image” and the “genitals image” (the “Original Order”). He found the “blurred image” was not an “intimate image” and dismissed TR’s application for a protection order over that image.⁴

17. Later, the Vice Chair cancelled the Original Order as it related to the “genitals image” because, contrary to what TR claimed, TR had posted the image online and thus forfeited any expectation of privacy.⁵ The Vice Chair did not accept TR’s attempted explanation that this was a “mistake.”⁶ Accordingly, the “genitals image” was not an “intimate image” that could be the

³ There appears to be a typo at para. 31 of the Administrative Penalty Decision where the Vice Chair refers to IIPA s. 13, which addresses publication bans, instead of s. 16.

⁴ Protection Order Decision, para. 45. That decision refers to the Respondent as “AQ”, whereas the Administrative Penalty Decision refers to the Respondent as TR. AQ and TR are the same person, *i.e.*, the named Respondent in this Petition.

⁵ Protection Order Decision, paras. 53-54.

⁶ Protection Order Decision, paras. 48-50.

subject of a protection order under the IIPA.⁷ The amended Protection Order in the decision re-issued May 26, 2025 (the “Administrative Penalty Decision”) provides that only the “altered image” was an “intimate image” under the IIPA.⁸

X Corp. Geo-Blocked the “Altered Image”

18. X Corp. received the Original Order around April 13, 2025. On receipt, X Corp. promptly complied with the order by geo-blocking the “altered image” in Canada, which restricted users located in Canada from accessing it. Geo-blocking is a sufficient and effective measure that involves identifying a relevant user’s country of origin based on information such as IP addresses assigned to each country, and then blocking access from specific countries accordingly.

19. In addition, X Corp. suspended an account that posted the “altered image” for violating the X Terms of Service. Once an account is suspended, none of its content is visible on X.

The Administrative Penalty Decision

TR’s application and X Corp.’s response

20. About a week after the Vice Chair made the Original Order, on April 7, 2025, TR requested the CRT impose an administrative monetary penalty on X Corp. for failing to comply with the Order.

21. TR served X Corp. with the corresponding Notice of Application on June 12, 2025, which did not specify how X Corp. had failed to comply with the Order.

22. In response to TR’s Notice of Application, X Corp. provided submissions acknowledging the Protection Order and explaining how it had complied with it by geo-blocking the “altered image” in Canada. X Corp. supported its position by referring to the Supreme Court of Canada’s decisions in *Re Upper Churchill Water Rights Reversion Act*, [1984] 1 S.C.R. 297 and *British Columbia v. Imperial Tobacco Canada Ltd.*, 2005 SCC 49, where Major J., writing for a unanimous court, reaffirmed the constitutional principle that “Provincial legislation must ... respect the limitations, territorial and otherwise, on provincial legislative competence found in s. 92. The opening words of s. 92 – ‘in each province’ – represent a blanket territorial limitation on provincial powers.”

The Vice Chair’s reasons for imposing an administrative penalty

23. On September 4, 2025, the Vice Chair ordered X Corp. to pay an administrative penalty of \$100,000 – the maximum allowed under s. 9 of the IIPR – and published his decision, even though

⁷ Protection Order Decision, paras. 53-54.

⁸ Protection Order Decision, para. 56.

“[t]ypically, the CRT does not publish protection order decisions or administrative penalty decisions.”⁹

24. The Vice Chair identified four issues he had to decide to address TR’s application:¹⁰

- (a) Does the CRT have the authority to order [X Corp.] to take actions that affect the availability of content outside BC?
- (b) Did [X Corp.] comply with the protection order?
- (c) Should [the Vice Chair] order [X Corp.] to pay an administrative penalty, and if so, how much?
- (d) Is TR entitled to compensation for her time spent on this dispute?

25. The Vice Chair acknowledged that X Corp. did not ignore the Protection Order, but instead “acted promptly to geofence the intimate image.”¹¹ He found, however, that by doing “something less” than globally deleting the “altered image”, X Corp. failed to comply with the Protection Order.¹²

26. The Vice Chair then held he was required to “proceed on the presumption that the IIPA is constitutional,” and that this meant he had to “presume that [he] had the authority to make a protection order with global effect and ... to enforce that order.”¹³

27. The Vice Chair declined to award TR compensation because TR “knowingly or negligently ... provided false or misleading submissions.”¹⁴

Part 3: LEGAL BASIS

The Administrative Penalty Decision Is Incorrect and Should Be Quashed

28. Both the IIPA and the CRTA are provincial statutes enacted by the British Columbia legislature, whose legislative authority is limited to the province’s territory.

29. Accordingly, the Vice Chair erred when he found that “proceed[ing] on the presumption that the IIPA is constitutional” required him to “presume that [he] had the authority to make a protection order with global effect and ... to enforce that order.”

⁹ Administrative Penalty Decision, para. 11.

¹⁰ Administrative Penalty Decision, para. 13.

¹¹ Administrative Penalty Decision, para. 38.

¹² Administrative Penalty Decision, para. 30.

¹³ Administrative Penalty Decision, para. 29.

¹⁴ Administrative Penalty Decision, para. 45.

30. This was simply incorrect. X Corp.’s primary argument was not that the IIPA was unconstitutional. Rather, it was that statutes have to be interpreted in light of the constitutional limitations of the legislature that enacted them. But the Vice Chair refused to engage with this argument at all.

31. If in fact the IIPA is that broad, then it is *ultra vires* and violates the principles of international comity. Either way, the Administrative Penalty Decision cannot stand.

Standard of Review

32. Reviewing the Administrative Penalty Decision on the basis of the constitutionality of the IIPA requires considering the matter *de novo*. Where constitutional questions lie outside the jurisdiction of an administrative decision-maker, parties can apply for judicial review and ask the court to rule on these issues: *Lundquist v. Central Kootenay (Regional District)*, 2019 BCSC 1303, paras. 50, 52 and 54. In this case, the Vice Chair found the arguments advanced by X Corp. raised issues outside the jurisdiction of the CRT. It therefore falls on this Court to hear X Corp.’s challenge to the constitutionality of s. 5 of the IIPA afresh on judicial review.

33. Alternatively, reviewing the Vice Chair’s interpretation of s. 5 of the IIPA raises questions of law reviewable on a standard of patent unreasonableness pursuant to ss. 56.7(1)(b), 56.7(2)(a) and 136.2(2) of the CRTA. But since the Vice Chair refused to engage with X Corp.’s arguments, there is nothing to defer to.

X Corp. Is Not Liable Under Section 5 of the IIPA

X Corp. complied with the Protection Order

34. X Corp. does not dispute the CRT’s authority to grant protection orders. X Corp. has complied with the Protection Order by geo-blocking the relevant content in Canada.

35. The Vice Chair found that X Corp. “acted promptly to geofence the intimate image” and “continued its practice of promptly geofencing the posts [featuring the image] in response to TR’s reports.”¹⁵

36. That X Corp. has made the “altered image” unavailable to anyone in Canada establishes that X Corp. complied with the Protection Order. For this reason alone, the Administrative Penalty Decision should be quashed.

X Corp. took reasonable steps to comply with the Protection Order

37. Alternatively, if this Court is unable to find that X Corp. complied with the Protection Order insofar as it is valid and applicable, it should nevertheless find that X Corp. took reasonable

¹⁵ Administrative Penalty Decision, paras. 21 and 38.

steps to comply with the Protection Order by making the “altered image” inaccessible to X users in Canada.

38. It follows that, pursuant to s. 12 of the IIPA, X Corp. cannot be liable in relation to an order issued under s. 5 of the IIPA. Absent such liability, there is no basis for imposing an administrative penalty under s. 16 of the IIPA.

The Vice Chair’s Global Blocking Order Violates International Comity

39. The Vice Chair’s holding “that [he] had the authority to make a protection order with global effect” violates international comity. The notion of comity that has “consistently been found to underlie Canadian recognition and enforcement law” refers to “the deference and respect due by other states to the actions of a state legitimately taken within its territory” and “the recognition which one nation allows within its territory to the legislative, executive or judicial acts of another nation, having due regard both to international duty and convenience, and to the rights of its own citizens or of other persons who are under the protection of its laws”: *Chevron Corp. v. Yaiguaje*, 2015 SCC 42, para. 51. It is well settled that statutes should be interpreted so as not to be inconsistent with international law and the comity of nations.

40. Ordering X Corp. to delete content from every country in the world would lead to unacceptable results. It would mean that foreign courts would also have the power to dictate what Canadian citizens can see on the Internet by issuing similar global blocking orders based on their own local laws.

41. Imagine if a Court in a hostile foreign country ordered X Corp. to globally remove posts made by Prime Minister Carney, Premier Eby, or another prominent Canadian leader? That would make the posts disappear from the Internet even for Canadians, disrespecting Canadian sovereignty and impeding Canada’s leaders’ ability to speak to Canadians.

Territorially restricted blocking orders are internationally accepted

42. X Corp. respects the right of every country to enforce its laws within its jurisdiction. A global blocking order would undermine the sovereignty of foreign nations as well as the principles of a free and open Internet and threaten free speech everywhere. Other countries have consistently limited removal orders in line with this philosophy.

43. In addition, the laws relating to “privacy” are not co-extensive in nature and vary widely from country to country. Thus, the laws of one country cannot be superimposed on all other countries. This principle is stated in various international authorities. Recognizing that each country’s laws vary widely, courts in the European Union, Australia, the United Kingdom, Germany, Brazil, Northern Ireland, and elsewhere have declined to impose the type of global blocking order that the Vice Chair asserts was issued under the IIPA.

44. The Federal Court of Australia recently refused to make this exact order in the context of alleged terrorist material: see *eSafety Commissioner v. X Corp*, [2024] FCA 499. Similarly, American Courts have regularly ordered injunctions against global blocking orders. In *Google LLC v. Equustek Solutions Inc.* (N.D. Cal. 2017), the United States Federal Court issued a permanent injunction against a Canadian court order requiring Google to globally remove certain URLs from its search results, despite Google having already geo-blocked those URLs in Canada. The Federal Court held that issuing the permanent injunction to prevent the enforcement of the Canadian order was in the public interest because the order violated U.S. laws. Specifically, the Court held, “the Canadian order undermines the policy goals of Section 230 and threatens free speech on the global internet.” Similar orders have been made in several other cases.

45. Canadian courts, like American courts, and indeed, courts all over the world, refuse to enforce foreign orders that are contrary to their public policy: *Chevron Corp. v. Yaiguaje*, 2015 SCC 42, para. 77; *Beals v. Saldanha*, 2003 SCC 72, paras. 71-77.

Issuing a global blocking order would result in a race to the bottom

46. If courts in different countries can issue global blocking orders based on their own laws, it would result in a situation where the country with the most restrictive laws would dictate what content is available on the Internet. This would lead to a situation where the Internet displays only content that is allowed by the most restrictive country in the world.

47. Such global takedowns also set a dangerous precedent that would legitimize practices of authoritarian governments, which do not fully value the rights to freedom of speech and access to information.

Geo-Blocking Is a Sufficient Remedy

48. Geo-blocking in Canada is a sufficient remedy because it ensures compliance with Canadian law without violating international comity. In the context of ordering the takedown of infringing content, administrative tribunals like the CRT should restrict their orders to “geo-blocking” of the content, *i.e.*, blocking the content in the country where it breaches the local laws, in this case Canada. This will ensure compliance with local laws without violating international comity.

49. TR argued that a person in Canada could access the “altered image” by circumventing X Corp.’s geo-blocking measures using a virtual private network (VPN). There was no evidence before the Vice Chair that any third parties were accessing the reported posts after X geo-blocked them, let alone that any meaningful number of people were accessing the posts in Canada or anywhere in the world once blocked. In addition, such a (hypothetical) person would (i) have to know posts featuring the “altered image” exist in the first place; and (ii) be deliberately and flagrantly using technological circumvention tools to get around X Corp.’s geo-blocking measures.

50. TR's argument that there is a "possibility" the "altered image" could have been accessed using technical circumvention tools cannot be a basis for a global takedown order. In *eSafety Commissioner v. X Corp*, the Federal Court of Australia found that X's geo-blocking measures were sufficient to comply with a government takedown order regarding "terrorist" material, even though the material could be accessed through a VPN. Other courts have taken the same position.

51. Thus, arguments similar to TR's have been rejected by numerous authorities and Commonwealth Nations that have refused to issue or uphold global blocking orders.

Section 5 of the IIPA Must Be Read in Accordance with Its Constitutional Limits

The Constitution imposes territorial limitations on provincial legislative powers

52. The Vice Chair also failed to ask whether there are constitutional limits that apply to the IIPA. Of course, there are.

53. The legislative authority of each province is restricted to its territory. Provincial legislation purporting to deprive individuals of rights they enjoy outside the province is therefore of no force and effect. That remains the case even when those individuals are amenable to the province's adjudicatory jurisdiction: *Interprovincial Co-operatives v. Manitoba*, [1976] 1 S.C.R. 477, pp. 508, 512.

54. As a statutory tribunal, the CRT's jurisdiction is also circumscribed by the territorial limits of British Columbia. "[N]o tribunal established by provincial legislation can extend its process beyond its own territory so as to subject either persons or property to its decisions": *McGuire v. McGuire*, [1953] O.R. 328 (Ont. C.A.), pp. 334-35.

55. Insofar as s. 5 of the IIPA, as currently worded, is *ultra vires*, there is a clear path to constitutional compliance that would avoid striking down the statute or even severing the impugned provision: *Schachter v. Canada*, [1992] 2 S.C.R. 679, p. 695.

56. This Court can and should read down the broad wording of the statute to circumscribe the territorial reach of protection orders issued thereunder. This would render the unconstitutional statute constitutional.

The Vice Chair's Interpretation of Section 5 of the IIPA Is Patently Unreasonable

57. The Administrative Penalty Decision is also patently unreasonable because the Vice Chair disregarded the presumption against extraterritoriality and the presumption of constitutionality. These errors on their own warrant quashing the Decision.

The Administrative Penalty Decision violates the presumption against extraterritoriality

58. The Vice Chair’s interpretation of s. 5 of the IIPA yields a more expansive grant of authority than would be presumed had the IIPA been a federal statute. This interpretation is patently unreasonable: see *Voice Construction Ltd. v. Construction & General Workers’ Union, Local 92*, 2004 SCC 23, para. 18.

59. Unlike the provinces, Canada “has the legislative competence to enact laws having extraterritorial effect.” Yet, “it is presumed not to intend to do so in the absence of clear words or necessary implication to the contrary.” Absent such clear words, courts presume “that Parliament did not intend its legislation to receive extraterritorial application”: *Society of Composers, Authors and Music Publishers of Canada v. Canadian Assn. of Internet Providers*, 2004 SCC 45, paras. 54-55.

60. Section 5 of the IIPA does not include “clear words” denoting an intent for protection orders granted thereunder to apply extraterritorially. Even if it had been enacted by Parliament, it is unlikely that it would be correct to interpret it as the Vice Chair did – that is, as applying beyond Canadian borders.

61. Courts have also applied the presumption against extraterritoriality to provincial legislation in the sense of presuming provincial legislatures did not intend for general words in a provincial statute to operate extraterritorially: see e.g. *Ontario (Attorney General) v. Reciprocal Insurers*, [1924] 1 D.L.R. 789 (JCPC), p. 801. Thus, the Vice Chair’s interpretation violates the presumption against extraterritoriality.

The presumption of constitutionality requires reading a territorial limitation into section 5

62. The Vice Chair declined to “consider constitutional arguments”, and instructed himself to proceed instead “on the presumption that the IIPA is constitutional.” But that is not what he did. Rather, his interpretation directly conflicts with foundational constitutional principles. As a matter of statutory interpretation, the Vice Chair was wrong to adjudicate TR’s application on the basis that he “must presume [he] had the authority to make a protection order with global effect ... and to enforce that order.” Rather, he was obliged to interpret the provision correctly.

63. “Where language in a statute is open to competing plausible interpretations, courts presume constitutional legislative intent and choose an interpretation that supports the law’s validity: *Reference re The Farm Products Marketing Act*, [1957] S.C.R. 198 at 255; *Siemens v. Manitoba (Attorney General)*, 2003 SCC 3 at para. 33. Along the same lines, it is presumed that general language in a statute is not intended to extend the law’s application beyond the powers of its enacting body: *Reference re Farm Products* at 255”: *Holland v. British Columbia (Attorney General)*, 2020 BCCA 304, para. 29.

64. In this case, the Vice Chair erroneously chose an interpretation that put the law's validity into question by presuming the provincial legislature intended to extend the IIPA's application beyond its own legislative authority.

65. A correct application of the presumption of constitutionality dictates a singular correct interpretation: s. 5 of the IIPA does not authorize making protection orders that apply in other countries.

Additional Grounds

66. The Petitioner relies on the Supreme Court Civil Rules, B.C. Reg. 168/2009, the following legislative provisions and regulations issued thereunder:

- (a) *Constitution Act, 1982* being Schedule B to the *Canada Act 1982 (UK)*, 1982, c.11;
- (b) *Judicial Review Procedures Act*, R.S.B.C. 1996, c. 241;
- (c) *Civil Resolution Tribunal Act*, S.B.C. 2012, c. 25;
- (d) *Intimate Images Protection Act*, S.B.C. 2023, c. 11.

Part 4: MATERIAL TO BE RELIED ON

- 1. The Record of Proceedings before the Civil Resolution Tribunal (to be provided to the parties and the Court by the Civil Resolution Tribunal);
- 2. The 1st Affidavit of Tayyibe Dunder sworn October 31, 2025; and
- 3. Such further and other materials as counsel may advise and this Honourable Court permit.

The Petitioner estimates that the hearing of the Petition will take 1 day.

Date: October 30, 2025



Signature of ☐ Petitioner
☒ Lawyer for Petitioner

Andrew Bernstein

To be completed by the court only:

Order made

☐ in the terms requested in paragraphs _____ of Part 1 of this Notice of Application

☐ with the following variations and additional terms:

Date: _____

Signature of ☐ Judge ☐ Associate Judge