

**THE QUEEN'S BENCH  
Winnipeg Centre**

BETWEEN:

**SHELLY GLOVER,**

Applicant,

– and –

**THE PROGRESSIVE CONSERVATIVE PARTY OF MANITOBA,**

Respondent,

Application under Queen's Bench Rule 14.05(2)(c)(iv)

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**NOTICE OF APPLICATION  
Uncontested before a Judge  
HEARING DATE: November 4, 2021 at 10:00 a.m.**

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**FILED NOV 02 2021**

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File No. 21193

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BETWEEN:

**SHELLY GLOVER,**

Applicant ,

– and –

**THE PROGRESSIVE CONSERVATIVE PARTY OF MANITOBA,**

Respondent ,

**NOTICE OF APPLICATION**

**TO THE RESPONDENT:**

**A LEGAL PROCEEDING HAS BEEN COMMENCED** by the applicant. The claim made by the applicant appears on the following pages.

**THIS APPLICATION** will come on for a hearing before a Judge, on Thursday, the 4<sup>th</sup> day of November, 2021 at ten o'clock in the forenoon, at the Law Courts Building, in Winnipeg, Manitoba.

**IF YOU WISH TO OPPOSE THIS APPLICATION**, you or a Manitoba lawyer acting for you must appear at the hearing.

**IF YOU WISH TO PRESENT AFFIDAVIT OR OTHER DOCUMENTARY EVIDENCE TO THE COURT OR TO EXAMINE OR CROSS-EXAMINE WITNESSES ON THE APPLICATION**, you or your lawyer must serve a copy of the evidence on the applicant's lawyer or, where the applicant does not have a lawyer, serve it on the applicant, and file it, with proof of service, in the court office where the application is to be heard as soon as possible, but not later than 2:00 p.m. on the day before the hearing.

**IF YOU FAIL TO APPEAR AT THE HEARING, JUDGMENT MAY BE GIVEN IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU.**

November 2, 2021

Issued by

Deputy Registrar

Court of Queen's Bench  
Law Courts Building  
100C - 408 York Avenue  
Winnipeg, MB R3C 0P9

TO: The Progressive Conservative Party of Manitoba  
23 Kennedy Street  
Winnipeg, MB R3C 1S5

### APPLICATION

1. The applicant makes application for:
  - (a) Pursuant to the Rules and Procedures for the conduct of the Leadership Election Process of the Progressive Conservative Party of Manitoba, an Order that the election result on October 30, 2021 declaring Heather Stefanson ("Stefanson") to be the premier-designate of Manitoba is invalid and that the office is vacant;
  - (b) In the alternative, an Order that the Applicant is duly elected to be the premier-designate of Manitoba;
  - (c) Costs of this Application; and
  - (d) Such further and other relief as counsel may request and this Honourable Court may deem just.

2. The grounds for the application are:
  - (a) On August 24, 2021, the Respondent announced that it would hold a Leadership Election (the “Election”) to select a new party leader and the next Premier of Manitoba;
  - (b) On September 16, 2021, the Applicant and Stefanson were named as the two official candidates in the Election, which was scheduled to be held on October 30, 2021;
  - (c) On October 30, 2021, it was announced that Stefanson had won the Election by a margin of 363 votes, with 8,405 votes for Stefanson, and 8,042 votes for the Applicant;
  - (d) There were substantial irregularities in the Election, calculated to affect the result;
  - (e) Rules and Procedures for the conduct of the Leadership Election Process of the Progressive Conservative Party of Manitoba;
  - (f) Court of Queen’s Bench Rule 14.05(2)(c)(iv); and
  - (g) Such further and other grounds as counsel may advise and this Honourable Court may deem just.
  
3. The following documentary evidence will be used at the hearing of the application:
  - (a) The Affidavit of Shelly Glover, to be sworn;
  - (b) The Affidavit of Kevin Cook, to be sworn; and

- (c) Such further and other evidence as counsel may advise and this Honourable Court may deem permit.

November 2, 2021

**HILL SOKALSKI WALSH LLP**  
Litigation Counsel  
Suite 2670 – 360 Main Street  
Winnipeg, Manitoba  
R3C 3Z3

Dave Hill / Melanie Wire  
File No. 21193

**NOTICE OF HEARING  
UNCONTESTED LIST**

**IMPORTANT NOTICE TO RESPONDENT  
MANITOBA COURT OF QUEEN'S BENCH GENERAL DIVISION (WINNIPEG  
CENTRE)**

You are being served with court documents relating to an Application for an Order that the election result on October 30, 2021 is invalid . If you are opposed to the relief being sought by the moving party, or wish to participate at the hearing, you are required to attend this hearing via teleconference on the date and time set out in the attached motion. The call in number and details for your matter is as follows:

Toll-free dial-in number: 1-800-974-5902  
Conference ID: 5148840

Matters on the uncontested list will proceed on the basis of their chronological place on the day's list. If you are opposing the relief sought you are expected to file responding material within the time periods prescribed by the Court of Queen's Bench Rules or as directed by the court. You are NOT to attend at the courthouse for the hearing as these matters are being heard strictly by way of teleconference during the current COVID-19 restriction period.