

IN THE SUPREME COURT OF CANADA
(APPEAL FROM THE COURT OF APPEAL FOR THE
PROVINCE OF BRITISH COLUMBIA)

BETWEEN:

GEORGE ERNEST HUNT

APPELLANT
(PLAINTIFF)

AND:

LAC D'AMIANTE DU QUEBEC LTEE, formerly
known as LAKE ASBESTOS COMPANY LTD.,
ASBESTOS CORPORATION LIMITED,
ATLAS TURNER INC.,
BELL ASBESTOS MINES LIMITED,
JM ASBESTOS INC.,
THE QUEBEC ASBESTOS MINING ASSOCIATION,
and NATIONAL GYPSUM CO.

RESPONDENTS
(DEFENDANTS)

AND:

T&N, plc,
CAREY CANADA INC., formerly known as
CAREY-CANADIAN MINES LTD.,
FLINTKOTE MINES LIMITED, and
THE FLINTKOTE CO.

(DEFENDANTS)

AND:

THE ATTORNEY GENERAL FOR THE PROVINCE OF QUEBEC,
and
THE ATTORNEY GENERAL FOR THE PROVINCE OF ONTARIO

INTERVENORS

RESPONDENTS' FACTUM

J.M. ASBESTOS INC.

LADNER DOWNS

Barristers & Solicitors
900 - 200 Burrard Street
Vancouver, B.C. V7X 1T2
Tel: (604) 687-5744
Fax: (604) 687-1415

J. J. Camp, Q.C.
David P. Church
S. Stephen Antle
Counsel for the Appellant

FARRIS, VAUGHAN, WILLS & MURPHY

Barristers & Solicitors
2600 - 700 West Georgia Street
Vancouver, B.C. V6Y 1B3
Tel: (604) 684-9151
Fax: (604) 661-9349

Jack Giles, Q.C.
Robert J. McDonell
Counsel for the Respondents,
Asbestos Corporation Limited,
Atlas Turner Inc. and
Bell Asbestos Mines Limited

LINDSAY KENNEY

Barristers & Solicitors
1700 - 700 West Pender Street
Vancouver, B.C. V6C 1G8
Tel: (604) 687-1323
Fax: (604) 687-2347

Richard B. Lindsay
Gregory S. Miller
Counsel for the Respondent,
JM Asbestos Inc.

LANG MICHENER LAWRENCE & SHAW

Barristers & Solicitors
2500 - 595 Burrard Street
Vancouver, B.C. V7X 1L1
Tel: (604) 689-9111
Fax: (604) 685-7084

Louis J. Zivot
Counsel for the Respondent
The Quebec Asbestos
Mining Association

OSLER HOSKIN & HARCOURT

Barristers & Solicitors
1500 - 50 O'Connor Street
Ottawa, Ontario K1P 6L2
Tel: (613) 235-7234
Fax: (613) 235-2867

Patricia J. Wilson
Ottawa Agents

GOWLING, STRATHY & HENDERSON

Barristers & Solicitors
2600 - 160 Elgin Street
Ottawa, Ontario K1N 8S3
Tel: (613) 232-1781
Fax: (613) 563-9869

Henry S. Brown
Ottawa Agents

GOWLING, STRATHY & HENDERSON

Barristers & Solicitors
2600 - 160 Elgin Street
Ottawa, Ontario K1N 8S3
Tel: (613) 232-1781
Fax: (613) 563-9869

Henry S. Brown
Ottawa Agents

**LANG, MICHENER, HONEYWELL,
WOTHERSPOON**

Barristers & Solicitors
300 - 40 O'Connor Street
Ottawa, Ontario K1P 6L2

David Burke
Ottawa Agents

RUSSELL & DuMOULIN
Barristers & Solicitors
1500 - 1075 West Georgia Street
Vancouver, B.C. V6E 3G2
Tel: (604) 688-3411
Fax: (604) 689-7503

W. S. Berardino, Q.C.
Avon M. Mersey
Counsel for the Respondent,
Lac D'Amiante du Quebec Ltee

ARVAY, FINLAY
Barristers & Solicitors
300 - 754 Broughton Street
Victoria, B.C. V8W 1E1
Tel: (604) 388-6868
Fax: (604) 388-4456

John L. Finlay
Counsel for the Respondent,
National Gypsum Co.

NOEL, BERTHIAUME, AUBRY
Barristers & Solicitors
111, rue Champlain
Hull, Quebec J8X 3R1
Tel: (819) 771-7393
Fax: (819) 771-5397

Counsel for the Attorney General
for the Province of Quebec

SOLOWAY, WRIGHT
Barristers & Solicitors
99 Metcalfe Street
Ottawa, Ontario K1P 6L7
Tel: (613) 236-0111
Fax: (613) 238-8507

Counsel for the Attorney General
for the Province of Ontario

GOWLING, STRATHY & HENDERSON
Barristers & Solicitors
2600 - 160 Elgin Street
Ottawa, Ontario K1N 8S3
Tel: (613) 232-1781
Fax: (613) 563-9869

Henry S. Brown
Ottawa Agents

BURKE-ROBERTSON
Barristers & Solicitors
70 Gloucester Street
Ottawa, Ontario K2P 0A2

W. G. Burke-Robertson, Q.C.
Ottawa Agents

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PART I

STATEMENT OF RESPONDENT' S POSITION WITH
RESPECT TO APPELLANT' S STATEMENT OF FACTS

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The Respondent, JM Asbestos Inc. adopts the facts as set out in the Factum of Asbestos Corporation Limited, Atlas Turner Inc. and Bell Asbestos Mines Limited.

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PART II

STATEMENT OF THE RESPONDENT'S
POSITION IN REGARD TO THE APPELLANT'S POINTS

10 The Respondent, JM Asbestos Inc. agrees and adopts the statement
of Asbestos Corporation Limited, Atlas Turner., Inc. and Bell
Asebestos Mines Limited in regard to the Appellant's points.

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PART III

ARGUMENT

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The Respondent JM Asbestos Inc. adopts the argument advanced by Asbestos Corporation Limited, Atlas Turner Inc., and Bell Asbestos Mines Limited.

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PAGE IV

NATURE OF ORDER SOUGHT

10 That this appeal be dismissed with costs to the
Respondents.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

Richard B. Lindsay

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Gregory S. Miller
Council for the Respondent
J.M. Asbestos Inc.

DATED: August 31, 1992

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