

## COURT OF APPEAL OF ALBERTA

Form AP-5  
[Rule 14.87]

COURT OF APPEAL FILE NUMBER: 2503 0193AC

TRIAL COURT FILE NUMBER: 1103 14112

REGISTRY OFFICE: EDMONTON

Registrar's Stamp



IN THE MATTER OF THE *TRUSTEE ACT*, R.S.A. 2000, c. T-8, AS AMENDED, and IN THE MATTER OF THE SAWRIDGE BAND *INTER VIVOS* SETTLEMENT CREATED BY CHIEF WALTER PATRICK TWINN, OF THE SAWRIDGE INDIAN BAND, NO. 19 now known as SAWRIDGE FIRST NATION ON APRIL 15, 1985 (the "1985 Sawridge Trust")

APPLICANTS: ROLAND TWINN, TRACEY SCARLETT, ROY TWINN, JONATHON POTSKIN AND BONNIE BLAKLEY, as Trustees for the 1985 Sawridge Trust

STATUS ON APPEAL: RESPONDENTS

RESPONDENT: CATHERINE TWINN

STATUS ON APPEAL: APPELLANT

RESPONDENT: OFFICE OF THE PUBLIC GUARDIAN AND TRUSTEE

STATUS ON APPEAL: RESPONDENT

DOCUMENT: **MEMORANDUM OF ARGUMENT OF THE OFFICE OF THE PUBLIC GUARDIAN AND TRUSTEE**

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## I. INTRODUCTION

1. This Memorandum of Argument on behalf of the Respondent, Office of the Public Guardian and Trustee (the “OPGT”), responds to the Leave to Intervene Application of the Sawridge First Nation (the “SFN”) scheduled to be heard (virtually) before a single Appeal Judge on November 26, 2025 at 9:30 AM.

## II. ARGUMENT

2. The SFN indicates at para. 21 of the Memorandum of Argument in support of its application (filed November 7, 2025) that it “will not widen the appeal, nor unduly delay the proceedings, and will confine its submissions to the issues before this Honourable Court”.
3. On this basis the OGPOT consents to Intervenor status being granted to the SFN.
4. The OGPOT disagrees, however, with the request of the SFN found at para. 23 of its Memorandum of Argument, that it be able to file written submissions and make oral argument “in accordance with the parameters granted to the Parties”.

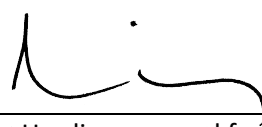
## III. CONCLUSION

5. The submission of the OPGT is that should intervenor status be granted to the SFN:
  - a. it be limited to a factum of not more than two-thirds (2/3) of the page limit established for the parties which has now been confirmed by the Case Management Officer to be 12 pages;<sup>1</sup>
  - b. That any SFN factum not repeat the arguments of the Appellant;
  - c. That any SFN factum be filed not later than two weeks after the deadline for the Appellant’s factum, which has now been set at December 4, 2025;<sup>2</sup> and
  - d. with respect to oral submissions SFN be limited to 15 minutes, subject of course to the discretion of the appeal panel.

All of which is respectfully submitted this 20<sup>th</sup> day of November, 2025.

**FIELD LLP**

Per: \_\_\_\_\_

  
 Greg Harding, counsel for the Respondent,  
 Office of the Public Guardian and Trustee

<sup>1</sup> By the November 20, 2025 decision of CMO Bobbi McDevitt confirmed for the parties to be 12 pages.

<sup>2</sup> *Ibid*