

Cause No.:

IN THE COURT OF KING'S BENCH OF NEW  
BRUNSWICK

COUR DU BANC DE LA ROI DU  
NOUVEAU-BRUNSWICK

TRIAL DIVISION

DIVISION DE PREMIÈRE INSTANCE

JUDICIAL DISTRICT OF MIRAMICHI

CIRCONSCRIPTION JUDICIAIRE DE

B E T W E E N:

E N T R E:

**CHIEF VINCENT LEBLANC ON BEHALF OF  
HIMSELF AND THE MEMBERS OF THE  
BUCTOUCHE MIC MAC BAND, CHIEF  
GEORGE GINNISH ON BEHALF OF HIMSELF  
AND THE MEMBERS OF THE NATOAGANEG  
FIRST NATION, CHIEF JOHN CLAUDE  
CAPLIN ON BEHALF OF HIMSELF AND THE  
MEMBERS OF THE EEL RIVER BAR FIRST  
NATION, CHIEF REBECCA KNOCKWOOD  
ON BEHALF OF HERSELF AND THE MEMBERS  
OF THE FORT FOLLY FIRST NATION, CHIEF  
KENNETH BARLOW ON BEHALF OF  
HIMSELF AND MEMBERS OF THE INDIAN  
ISLAND BAND, CHIEF BILL WARD ON  
BEHALF OF HIMSELF AND THE MEMBERS OF  
THE METEPENAGIAG MI'KMAQ NATION,  
CHIEF ALVERY PAUL ON BEHALF ON  
HIMSELF AND THE MEMBERS OF THE  
ESGENOOPETITJ FIRST NATION, CHIEF  
TERRY RICHARDSON ON BEHALF OF  
HIMSELF AND THE MEMBERS OF THE  
PABINEAU FIRST NATION, AND ON BEHALF  
OF THE DISTRICTS OF GESPE'GEWA'GI  
AND SIGNIGTEWA'GI OF THE MI'GMAG  
NATION**

Demandeur

- et -

Plaintiffs

-and-

**THE PROVINCE OF NEW BRUNSWICK,  
THE ATTORNEY GENERAL OF CANADA,  
THE NEW BRUNSWICK POWER  
CORPORATION, AND THE REGIONAL  
DEVELOPMENT CORPORATION**

Défendeur

Defendant

**NOTICE OF ACTION WITH STATEMENT OF  
CLAIM ATTACHED  
(Form 16A)**

**AVIS DE POURSUITE ACCOMPAGNÉ  
D'UN EXPOSÉ DE LA DEMANDE  
(FORMULE 16A)**

**TO: The Defendant**  
The Province of New Brunswick  
673 King George Highway  
Miramichi NB E1V 1N6

**The Defendant**  
The Attorney General of Canada  
Suite 1400, Duke Tower  
5251 Duke Street  
Halifax NS B3J 1P3

**The Defendant**  
The New Brunswick Power Corporation  
515 King Street  
Fredericton, NB E3B 1E7

**The Defendant**  
The Regional Development Corporation  
Chancery Place  
675 King Street, 3<sup>rd</sup> Floor  
Fredericton, NB E3B 1E9

LEGAL PROCEEDINGS HAVE BEEN COMMENCED AGAINST YOU BY FILING THIS NOTICE OF ACTION WITH STATEMENT OF CLAIM ATTACHED.

If you wish to defend these proceedings, either you or a New Brunswick lawyer acting on your behalf must prepare your Statement of Defence in the form prescribed by the Rules of Court and serve it on the Plaintiff or the Plaintiff's lawyer at the address shown below and, with proof of such service, file it in this Court office, together with the filing fee of \$50.00,

(a) If you are served in New Brunswick, WITHIN 20 DAYS after service on you of this Notice of Action With Statement of Claim Attached, or

(b) If you are served elsewhere in Canada or in the United States of America, WITHIN 40 DAYS after such service, or

PAR LE DÉPOT DU PRÉSENT AVIS DE POURSUITE ACCOMPAGNÉ D'UN EXPOSÉ DE LA DEMANDE, UNE PURSUIVE JUDICIAIRE A ÉTÉ ENGAGÉ CONTRE VOUS.

Si vous désirez présenter une défense dans cette instance, vous-même ou un avocat du Nouveau-Brunswick chargé de vous représenter devrez rédiger un exposé de votre défense en la forme prescrite par les Règles de procédure, le signifier au demandeur ou à son avocat à l'adresse indiquée ci-dessous et le déposer au greffe de cette Cour avec un droit de dépôt de \$50 et une preuve de sa signification:

(a) DANS LES 20 JOURS de la signification que vous sera faite du présent avis de poursuite accompagné d'un exposé de la demande, si elle vous est fait au Nouveau-Brunswick ou

(b) DANS LES 40 JOURS de la signification, si elle vous est faite dans une autre région du Canada ou dans les États-Unis d'Amérique ou

(c) If you are served anywhere else, WITHIN 60 DAYS after such service.

If you fail to do so you may be deemed to have admitted any claim made against you and without further notice to you JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE.

You are advised that:

(a) You are entitled to issue documents and present evidence in the proceeding in English or French or both;

(b) The Plaintiff intends to proceed in the English language; and

(c) Your Statement of Defence must indicate the language in which you intend to proceed.

If you pay to the Plaintiff or the Plaintiff's lawyer the amount of the Plaintiff's claim, together with the sum of \$100.00 for the Plaintiff's costs, within the time you are required to serve and file your Statement of Defence, further proceedings will be stayed or you may apply to the Court to have the action dismissed.

THIS NOTICE is signed and sealed for the Court of King's Bench by \_\_\_\_\_, Clerk of the Court at 673 King George Highway, Miramichi, New Brunswick, on the \_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
[insert name here]  
Clerk of the Court  
Judicial District of Miramichi

Miramichi Law Courts  
673 King George Highway  
Miramichi, NB E1V 1N6

(c) DANS LES 60 JOURS de la signification, si elle vous est faite ailleurs.

Si vous omettez de la faire, vous pourrez être réputé avoir admis toute demande formulée contre vous et, sans autre avis, JUGEMENT POURRA ÊTRE RENDU CONTRE VOUS EN VOTRE ABSENCE.

Sachez que:

(a) Vous avez le droit dans la présente instance, d'émettre des documents et de présenter votre preuve en français, en anglais ou dans les deux langues;

(b) Le demandeur a l'intention d'utiliser la langue Anglais; et

(c) L'exposé de votre défense doit indiquer la langue que vous avez l'intention d'utiliser.

Si, dans le délai accordé pour la signification et le dépôt de l'exposé de votre défense, vous payez au demandeur ou à son avocat le montant qu'il réclame, plus \$100.00 pour couvrir ses frais, il y aura suspension de l'instance ou vous pourrez demander à la cour de rejeter l'action.

CET AVIS est signé et scellé au nom de la Cour du Roi de la Reine par \_\_\_\_\_, greffier de la Cour à \_\_\_\_\_, ce \_\_\_\_\_, 20\_\_.

## STATEMENT OF CLAIM

1. The Plaintiffs are eight of the nine Chiefs of the Mi'gmaq First Nations located in the portion of Mi'gma'gi (the territory of the Mi'gmaq) that is currently known as New Brunswick. The Plaintiffs, on their own behalf, on behalf of the members of their respective First Nations, and on behalf of their respective Districts of Gespe'gewa'gi and Signigtewa'gi of the Mi'gmaq Nation, and on behalf of all members of the Mi'gmaq Nation claim:
  - a. a declaration that the Mi'gmaq Nation holds Mi'gmaq Title to the lands, including the land, airspace, land covered by water, offshore and inshore water bodies, foreshore, rivers, lakes and streams, described in Schedule "A", or to such portions thereof for which this Court may find the evidence sufficient (the "Title Area");
  - b. a declaration that the Defendants, or each of them, unjustifiably infringed Mi'gmaq Title in respect of the Title Area;
  - c. a declaration that the Defendants, or each of them, breached their fiduciary duties towards the Mi'gmaq Nation and have failed to act in accordance with the Honour of the Crown (the "Constitutional Duties");
  - d. a declaration that the Defendants account for any benefit they have received flowing from or as a result of Mi'gmaq Title in the Title Area;
  - e. an order that the Defendants disgorge any such benefit received;
  - f. damages, including equitable damages, arising from the unjustifiable infringement of Mi'gmaq Title;
  - g. damages and compensation from the Defendants, jointly and severally, for the Defendants' breaches of the Crown's Constitutional Duties, and for the unlawful occupation, appropriation, removal of resources from, and infringement of, Mi'gmaq Title over the Title Area, including infringements arising from the Defendants and others being in occupation of the Title Area without permission from the Mi'gmaq Nation;
  - h. a declaration that, in respect of fee simple lands and industrial freehold lands in the Title Area, that Mi'gmaq Title burdens the Crown's allodial title;
  - i. in respect of lands purported to be Crown lands that are subject to a leasehold interests, a declaration that such leases are subject to Mi'gmaq Title and the vesting of the reversion and any remainder to the Plaintiffs, on behalf of the Mi'gmaq Nation;
  - j. vesting in possession/interest in favour of the Plaintiffs, on behalf of the Mi'gmaq Nation, of the lands purported to be Crown lands bearing the property identification numbers set out in Schedule "B";

- k. a determination, with respect to the lands purported to be Crown lands other than those bearing the property identification numbers set out in Schedule “B”, of whether those lands should vest in possession in favour of the Plaintiff, on behalf of the Mi’gmaq Nation;
- l. an order that the Defendants consult with the Plaintiffs, on behalf of the Mi’gmaq Nation, with respect to the creation of an effective means to:
  - i. allow a First Nation to register lands held pursuant to Aboriginal Title;
  - ii. allow a First Nation to record and register interests in lands granted by or created by the First Nation in lands held pursuant to Aboriginal Title;
  - iii. allow that First Nation a means of enjoying the economic benefits conferred by Aboriginal Title.
- m. an order that if, after one year, the Plaintiffs and the Defendants are unable to agree upon an effective means to provide for the matters set out in the previous paragraph, either party will be at liberty to apply to the court in these proceedings for a further order addressing this matter;
- n. a declaration that the Defendants have breached the rights of the members of the Mi’gmaq Nation pursuant to Section 15 of the *Canadian Charter of Rights and Freedoms*, Part 1 of the *Constitution Act, 1982*, being Schedule B to the *Canada Act 1982 (UK), 1982, c 11 a* (the “*Charter*”) by:
  - i. failing to establish effective administrative means to recognize, protect and if necessary adjudicate the existence, scope and extent of Mi’gmaq Title;
  - ii. failing to establish effective administrative means to provide compensation for government decisions that injuriously affect or appropriate Mi’gmaq Title.
- o. a declaration that the Defendants have breached the Honour of the Crown by:
  - i. failing to establish effective administrative means to recognize, protect and if necessary adjudicate the existence, scope and extent of Mi’gmaq Title of the Plaintiffs prior to making decisions that could have a significant adverse effect on or unjustifiably infringe the Mi’gmaq Title of the Mi’gmaq Nation;
  - ii. failing to establish effective administrative means to provide compensation for government decisions that injuriously affect or appropriate Mi’gmaq Title prior to making decisions that could have a significant adverse effect on or unjustifiably infringe Mi’gmaq Title.
- p. interlocutory and permanent injunctive relief, including but not limited to:

- i. an interlocutory and permanent injunction prohibiting the appropriation by the Defendants of any part of the Title Area without the consent of the Plaintiffs, on behalf of the Mi'gmaq Nation; and
    - ii. an interlocutory and permanent injunction prohibiting the issuance, renewal, or granting of tenures to third parties in any manner which may infringe on Mi'gmaq Title without the consent of the Plaintiffs, on behalf of the Mi'gmaq Nation;
  - q. a declaration that any statutes enacted by the Defendants that meaningfully diminish the right of the Mi'gmaq Nation to exclusively occupy the Title Area are constitutionally invalid, or constitutionally inapplicable to the Title Area.
  - r. pre- and post-judgment interest;
  - s. costs on a substantial indemnity basis; and
  - t. such further and other relief as this Honourable Court may deem just.
2. The Plaintiffs seek relief only as against lands held by the Crown and Crown Corporations, however so held.
  3. In respect of fee simple lands that are not held by the Crown, the Plaintiffs seek no relief against fee simple holders who hold fee simple title in the Title area ("Fee Simple Holders"). The incidents of fee simple title enjoyed by Fee Simple Holders, including the incident of peaceful possession, are not placed in issue by the Plaintiffs. As outlined in paragraph 1(h), however, the Plaintiffs seek damages and compensation on behalf of the Mi'gmaq Nation from the Defendants, jointly and severally, for the infringement of Mi'gmaq Title in the granting of fees simple in the Title Area to Fee Simple Holders.
  4. In respect of industrial freehold lands that are not held by the Crown, the Plaintiffs similarly seek no relief against the holders of industrial freehold lands in the Title Area ("Industrial Freehold Landowners"). The incidents of industrial freehold land ownership are not placed in issue by the Plaintiffs, as outlined in paragraph 1(h), however, the Plaintiffs seek damages and compensation on behalf of the Mi'gmaq Nation from the Defendants, jointly and severally, for the breach of Mi'gmaq Title in the granting of industrial freehold land ownership in the Title Area to Industrial Freehold Landowners.
  5. The Plaintiffs do not seek a declaration of Mi'gmaq Title in paragraph 1(a) that binds Fee Simple Holders and Industrial Freehold Landowners with respect to such Fee Simple Holders and Industrial Freehold Landowners' property rights. However, the Plaintiffs do seek a declaration on behalf of the Mi'gmaq Nation in respect of fee simple and industrial freehold lands that Mi'gmaq Title burdens the Crown's allodial title.

6. In respect of fee simple and industrial freehold lands in the Title Area that are not held by the Defendants, exclusive use and possession of these lands is not sought by the Plaintiffs in this litigation. For greater certainty, the Plaintiffs, on behalf of the Mi'gmaq Nation, seek exclusive use and possession of Crown lands only. With respect to fee simple and industrial freehold lands that are not held by the Defendants, the Plaintiffs seek a declaration of Mi'gmaq Title that burdens the Crown's allodial title only.

## **The Parties**

7. The Plaintiffs are the duly elected Chiefs representing eight of the nine Mi'gmaq First Nation communities located within the portion of Mi'gma'gi (the territory of the Mi'gmaq) that is currently known as New Brunswick.
8. Amlamgog (Fort Folly) First Nation, Natoaganeg (Eel Ground) First Nation, Oinpegitjoig (Pabineau) First Nation, Esgenoôpetitj (Burnt Church) First Nation, Tjipôgtôtjg (Buctouche) First Nation, L'nui Menikuk (Indian Island) First Nation, Ugpi'ganjig (Eel River Bar) First Nation and Metepenagiag Mi'kmaq Nation (collectively, the "Mi'gmaq Communities") are each a body of "Indians" for whose use and benefit in common purported Crown lands have been set apart and each constitute a "band" recognized pursuant to the *Indian Act*, R.S.C. 1985, c. I-5 (the "*Indian Act*").
9. Mi'gma'gi is a geographic territory composed of seven districts, which include what is today known as Nova Scotia, Prince Edward Island, New Brunswick, the Gaspé Peninsula and parts of Québec, parts of Newfoundland and Labrador, part of Maine and the Islands in the Baie des Chaleurs, as well as their surrounding coastal and marine areas. Mi'gma'gi includes not only these land areas, but also the waters, islands, air and resources of and around them.
10. The Mi'gmaq Communities are located within the Districts of Gespe'gewa'gi and Signitewa'gi, which are indicated in the District Map attached hereto as Schedule "C".
11. The Plaintiffs bring this action on their own behalf, on behalf of the members of their respective First Nations, and on behalf of their respective Districts of the Mi'gmaq Nation, and on behalf of all members of the Mi'gmaq Nation, all of whom are Indians within the meaning of section 91(24) of the *Constitution Act, 1867*, 30 & 31 Vict., c. 8 (the "*Constitution Act, 1867*") and Aboriginal Peoples within the meaning of section 35 of the *Constitution Act, 1982*, being Schedule B to the *Canada Act 1982 (UK)*, 1982, c 11 (the "*Constitution Act, 1982*").
12. The Mi'gmaq Nation is an Indigenous people, and a distinctive Aboriginal group, with common territory, language, culture, values, customs, practices, traditions, beliefs, kinship ties, and legal and political systems with respect to the lands and waters within Mi'gma'gi.
13. The Plaintiffs have commenced this action with respect to the portion of Mi'gma'gi currently known as New Brunswick. This is inclusive of territory claimed by the Wolastoqey and Peskotomuhkati, or shared by the Wolastoqey, Peskotomuhkati, and Mi'gmaq, as members of

the Wabanaki Confederacy and pursuant to protocols and understandings between these Nations.

14. The Mi'gmaq Nation as it exists today is the continuation and successor to the Mi'gmaq Nation as it existed prior to and at contact with Europeans and the assertion of sovereignty by the British Crown.
15. The Defendant, the Attorney General of Canada ("Canada"), is the representative of His Majesty the King in Right of Canada and is named in these proceedings pursuant to section 23(1) of the *Crown Liability and Proceedings Act*, R.S.C. 1985, c. C-50, as amended.
16. Canada has legislative jurisdiction in relation to "Indians and lands reserved for the Indians" pursuant to subsection 91(24) of the *Constitution Act, 1867*, subject to the rights and interests of the Plaintiffs.
17. The Defendant, the Province of New Brunswick ("New Brunswick"), is the representative of His Majesty the King in Right of the Province of New Brunswick and is named in these proceedings pursuant to sections 3, 11, and 12 of the *Proceedings Against the Crown Act*, R.S.N.B. 1973, c. P-18, as amended.
18. New Brunswick is vested with the administration, control and beneficial interest in purported provincial Crown lands pursuant to section 109 of the *Constitution Act, 1867*, subject to the rights and interests of the Mi'gmaq Nation.
19. New Brunswick has legislative jurisdiction over lands in New Brunswick pursuant to subsections 92(5) and 92(13) of the *Constitution Act, 1867*, subject to the rights and interests of the Plaintiffs.
20. The Defendant, the New Brunswick Power Corporation ("NB Power"), is a Crown corporation of the Province of New Brunswick and is named in these proceedings pursuant to sections 3, 11, and 12 of the *Proceedings Against the Crown Act*, R.S.N.B. 1973, c. P-18, as amended.
21. The Defendant, the New Brunswick Regional Development Corporation ("Regional Development Corporation"), is a Crown corporation of the Province of New Brunswick and is named in these proceedings pursuant to sections 3, 11, and 12 of the *Proceedings Against the Crown Act*, R.S.N.B. 1973, c. P-18, as amended.
22. Together, Canada, New Brunswick, NB Power and Regional Development Corporation are referred to in these proceedings as the Defendants.
23. The Defendants are the successors to the British Crown, and therefore have a constitutional relationship with the Plaintiffs.



## Material Facts

### i) The Title Area

24. The Mi'kmaq Nation, has occupied and cared for the lands and waters of Mi'gma'gi since time immemorial.
25. Prior to, and at the time of European contact and the assertion of British sovereignty, Mi'gma'gi was, and continues to be, occupied and possessed communally by the Mi'gmaq Nation. Mi'gma'gi is the homeland of the Mi'gmaq, and at all material times the connection of the Mi'gmaq to Mi'gma'gi has been of central significance to and the source of the distinctive culture of the Mi'gmaq.
26. The Plaintiffs only seek remedies in this litigation with respect to the portion of Mi'gma'gi currently referred to as New Brunswick, including the land, subsurface land and minerals, airspace, land covered by water, offshore and inshore water bodies, foreshore, rivers, lakes and streams situation within this area. A map of the Title Area within New Brunswick is included in Schedule "A". The Plaintiffs reserve the right to claim Mi'gmaq Title in respect of the whole or any portions of Mi'gma'gi in the future.
27. Prior to and at the assertion of British sovereignty, the Mi'gmaq had a sophisticated system of governance which provided for decision-making at the Nation, District, and local or watershed level. Under this system of governance, Mi'gmaq people in each District and local area had use of that District, including all of its lands, waters, and resources. However, the Mi'gmaq as a whole had occupation of all of Mi'gma'gi (including the entire Title Area), and members were able to travel and harvest throughout Mi'gma'gi (including the Title Area), subject only to such restrictions as were imposed by local or district Chiefs and heads of families.
28. Prior to and at the assertion of British Sovereignty, the Mi'gmaq were a part of a larger Confederacy of Nations, known as the Wabanaki Confederacy, which included the Wolastoqey and Peskotomuhkati Nations. From time to time, the members of the Wabanaki Confederacy used each other's territory, pursuant to Wampum agreements, protocols and understandings between these Nations.

### ii) Mi'gmaq Title

29. Prior to and at the assertion of British sovereignty, the Mi'gmaq exclusively used, occupied, and exercised effective control over the lands and waters of the Title Area. This is inclusive of territory where there was shared exclusivity between the Wolastoqey and Mi'gmaq, as members of the Wabanaki Confederacy and pursuant to protocols and understandings between these Nations.
30. Prior to and at the assertion of British sovereignty, the Mi'gmaq continuously had and exercised practices, customs, traditions and activities throughout all of the lands and waters of the Title Area, including hunting, fishing, gathering and other resource-harvesting activities, trade, and cultural and spiritual practices.

31. Prior to and at the assertion of British sovereignty, the Mi'gmaq continuously hunted, fished, and harvested in their territory and have used, cared for, and occupied the natural resources and all components on the natural resources therein. They have obtained their livelihood and subsistence from their territory and the natural resources thereof, and have continuously possessed, controlled and managed, and to the extent possible still possess, control and manage, the natural resources of their territory within the Title Area.
32. Prior to and at the assertion of British sovereignty, the Mi'gmaq enjoyed a special relationship with the land, waters and resources of what is now known as the Province of New Brunswick. The relationship of the Mi'gmaq with the land, water and all natural resources within the Title Area is the foundation upon which the Plaintiffs, and their ancestors, interact and govern their communities, and is an expression of Mi'gmaq law.
33. Prior to and at the assertion of British sovereignty, the Mi'gmaq exercised jurisdiction over the Title Area pursuant to Mi'gmaq legal and political regimes governing the use and occupation of land, and continues to do so today.
34. At all relevant times, from the assertion of British sovereignty to the Peace and Friendship Treaties between the British and the Mi'gmaq from 1725 to 1779 the British Crown recognized Mi'gmaq ownership and jurisdiction over the lands and waters of Mi'gma'gi, including the Title Area.
  - iii) The Peace and Friendship Treaties
35. The Mi'gmaq have never ceded their sovereignty and title over Mi'gma'gi.
36. Beginning in 1726, the Mi'gmaq entered into sacred, constitutionally protected Treaties of Peace and Friendship with the British Crown, which recognized Mi'gmaq Nationhood, title and rights.
37. In entering into these Treaties, the Mi'gmaq did not cede or surrender their Mi'gmaq Title of ownership and stewardship over the lands and waters of Mi'gma'gi, including the Title Area to the Crown.
38. Mi'gmaq Title has never been extinguished through surrender or legislation, and survives today.
39. The Plaintiffs reserve the right to claim Mi'gmaq Title and rights in respect of the whole or any portions of Mi'gma'gi outside the Title Area depicted in Schedule "A" in the future.

### **Infringement of the Plaintiffs' Mi'gmaq Title by the Crown**

40. Canada and New Brunswick and their predecessors had and have a duty to respect and protect Mi'gmaq Title.
41. The Defendants have infringed upon or otherwise breached their Constitutional Duties in respect of Mi'gmaq Title in the Title Area by alienating lands and undertaking, authorizing

and/or permitting resource extraction and land use activities throughout the Title Area without the consent of the Mi'gmaq Nation.

42. Such uses and alienations of land were in breach of the Defendants' duties to respect and protect Mi'gmaq Title and have unjustifiably infringed Mi'gmaq Title.
43. In particular, the Defendants breached their duties to respect and protect Mi'gmaq Title by actions including, but not limited to:
  - a. issuing, replacing, and renewing licenses, leases, permits, authorizations, grants and other tenures (collectively, the "Tenures") to third parties or otherwise occupying, managing, and allocating land and resources in a manner which interferes with Mi'gmaq Title;
  - b. conveying land to themselves and to third parties without regard to Mi'gmaq Title;
  - c. passing laws which purport to enable or authorize the Defendants to alienate lands and resources to third parties or to use those resources for their own use or benefit;
  - d. purporting to exercise management, ownership and control over lands and resources without regard to Mi'gmaq Title;
  - e. committing or authorizing nuisances, trespass or other interferences which restrict or interfere with Mi'gmaq Title;
  - f. deriving royalties and other benefits from the lands and resources and denying the Mi'gmaq Nation the right to receive benefits therefrom;
  - g. failing to protect and sustainably manage the lands and resources;
  - h. failing to adequately consult and/or accommodate the Mi'gmaq Nation or otherwise discharge the Crown's fiduciary duties or the Honour of the Crown in respect of the above-named activities (the "Constitutional Duties"); and
  - i. such other infringements as counsel may advise.
44. Such infringements were not justified. These infringements were not made after the discharge of the Defendants' procedural duty to consult and accommodate; the Defendants' actions were not backed by a compelling and substantial objective; and the governmental actions were not consistent with the Constitutional Duties of the Defendants.
45. The Defendants owe the Mi'gmaq Nation compensation for infringements on their Mi'gmaq Title by parties other than the Defendants, for the loss of use of their lands within the Title Area, and for breach of fiduciary duties and the Honour of the Crown.
46. In respect of the lands in the Title Area that are not held by the Defendants, the return of these

lands is not sought by the Plaintiffs in this litigation, in spite of the unjustified infringements on them that have been authorized by the Defendants. The compensation that the Defendants owe the Mi'gmaq Nation in respect of these lands must concomitantly increase to account for the permanence of the Mi'gmaq Nation's' loss of use of these lands.

47. Furthermore, the Defendants themselves purport to have ownership of some of the Mi'gmaq Nation's' lands within the Title Area. Upon a declaration of Mi'gmaq Title:
- a. all such lands immediately vest in interest to the Plaintiffs, on behalf of the Mi'gmaq Nation;
  - b. the Plaintiffs, on behalf of the Mi'gmaq Nation, are entitled to vesting in possession of all purported Crown lands within the parts of Schedule "A" which are declared to be Mi'gmaq Title lands;
  - c. with respect to purported Crown lands subject to a leasehold interest, a declaration that such leases are subject to Mi'gmaq Title and the vesting of the reversion and any remainder in the Plaintiffs, on behalf of the Mi'gmaq Nation;
  - d. compensation for past and ongoing infringement of Mi'gmaq Title is due from each respective Defendant, to be reduced where appropriate to account for lands that are returned in possession of the Plaintiffs, on behalf of the Mi'gmaq Nation;
  - e. compensation for future infringement of Mi'gmaq Title is due from each respective Defendant with respect to Mi'gmaq Title lands which are not vested in interest and/or possession to the Plaintiffs, on behalf of the Mi'gmaq Nation.
48. In addition, to the extent that resources, such as minerals and timber, have been removed from the Title Area by the Defendants or by persons not involved in this litigation, where such removal was done with the permission of the Defendants, the Defendants owe the Mi'gmaq Nation compensation for the value of these resources.
49. In addition, to the extent that lands and resources within and on the Title Area have been lost or damaged by the Defendants or by persons not involved in this litigation, where such loss or damage was done with the permission of the Defendants, the Defendants owe the Mi'gmaq Nation compensation for the value of these resources and for the damage to the lands.
50. The amount of compensation that the Defendants owe the Mi'gmaq Nation will be further particularized by the evidence to be adduced at trial.
51. In addition, an interim and permanent injunction is warranted to prevent further or new interference with the Mi'gmaq Title throughout the Title Area.
52. Moreover, any statutes enacted by the Defendants that meaningfully diminish the right of the Mi'gmaq Nation to exclusively occupy the Title Area is constitutionally invalid, or constitutionally inapplicable to the Claim.

53. The Plaintiffs plead and rely upon:

- a. Section 91(24) of the *Constitution Act, 1867*, 30 & 31 Vict., c. 8;
- b. Sections 25, 35, and 52 of the *Constitution Act, 1982*, being Schedule B to the *Canada Act 1982 (UK)*, 1982, c 11;
- c. *Canadian Charter of Rights and Freedoms*, Part 1 of the *Constitution Act, 1982*, being Schedule B to the *Canada Act 1982 (UK)*, 1982, c 11 a.;
- d. The United Nations Declaration on the Rights of Indigenous Peoples;
- e. *United Nations Declaration on the Rights of Indigenous Peoples Act*, SC 2021, c 14.

DATED at Halifax, Nova Scotia, this 25th day of FAIT à \_\_\_\_\_ le \_\_\_\_\_ 20\_\_.  
July, 2024.



\_\_\_\_\_  
Derek A. Simon  
**BURCHELL WICKWIRE BRYSON LLP**  
Solicitors for the Plaintiffs

\_\_\_\_\_  
Avocat du demandeur

**BURCHELL WICKWIRE BRYSON LLP**  
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# SCHEDULE "A"

## TITLE AREA



## SCHEDULE "B"

<b>PID</b>	<b>Owner</b>	<b>Focus Area</b>
00154179	Crown	Big Salmon River Watershed
00154211	Crown	Big Salmon River Watershed
00154377	Crown	Big Salmon River Watershed
00154393	Crown	Big Salmon River Watershed
00428219	Crown	Big Salmon River Watershed
00428482	Crown	Big Salmon River Watershed
00428490	Crown	Big Salmon River Watershed
00428581	Crown	Big Salmon River Watershed
25244500	Crown	Big Salmon River Watershed
25361122	Crown	Big Salmon River Watershed
25388537	Crown	Big Salmon River Watershed
30104137	Crown	Big Salmon River Watershed
30104145	Crown	Big Salmon River Watershed
30152722	Crown	Big Salmon River Watershed
30152748	Crown	Big Salmon River Watershed
30152755	Crown	Big Salmon River Watershed
30152763	Crown	Big Salmon River Watershed
30152771	Crown	Big Salmon River Watershed
30152789	Crown	Big Salmon River Watershed
30152797	Crown	Big Salmon River Watershed
30152805	Crown	Big Salmon River Watershed
30152813	Crown	Big Salmon River Watershed
30152821	Crown	Big Salmon River Watershed
30152839	Crown	Big Salmon River Watershed
30152847	Crown	Big Salmon River Watershed
30152854	Crown	Big Salmon River Watershed
30152862	Crown	Big Salmon River Watershed
30152870	Crown	Big Salmon River Watershed
30152888	Crown	Big Salmon River Watershed
30152896	Crown	Big Salmon River Watershed
30152904	Crown	Big Salmon River Watershed
30152912	Crown	Big Salmon River Watershed

30152920	Crown	Big Salmon River Watershed
30152938	Crown	Big Salmon River Watershed
30152946	Crown	Big Salmon River Watershed
30152953	Crown	Big Salmon River Watershed
30152961	Crown	Big Salmon River Watershed
30152979	Crown	Big Salmon River Watershed
30152987	Crown	Big Salmon River Watershed
30152995	Crown	Big Salmon River Watershed
30153001	Crown	Big Salmon River Watershed
30153019	Crown	Big Salmon River Watershed
30153027	Crown	Big Salmon River Watershed
30153035	Crown	Big Salmon River Watershed
30153043	Crown	Big Salmon River Watershed
30153050	Crown	Big Salmon River Watershed
30153068	Crown	Big Salmon River Watershed
30153076	Crown	Big Salmon River Watershed
30153084	Crown	Big Salmon River Watershed
30153092	Crown	Big Salmon River Watershed
30153100	Crown	Big Salmon River Watershed
30153118	Crown	Big Salmon River Watershed
30153126	Crown	Big Salmon River Watershed
30153134	Crown	Big Salmon River Watershed
30153142	Crown	Big Salmon River Watershed
30153159	Crown	Big Salmon River Watershed
30153167	Crown	Big Salmon River Watershed
30153175	Crown	Big Salmon River Watershed
30153183	Crown	Big Salmon River Watershed
30153191	Crown	Big Salmon River Watershed
30153209	Crown	Big Salmon River Watershed
30153217	Crown	Big Salmon River Watershed
30153225	Crown	Big Salmon River Watershed
30153233	Crown	Big Salmon River Watershed
30153241	Crown	Big Salmon River Watershed
30153258	Crown	Big Salmon River Watershed
30153266	Crown	Big Salmon River Watershed



30153274	Crown	Big Salmon River Watershed
30153282	Crown	Big Salmon River Watershed
30153290	Crown	Big Salmon River Watershed
30153704	Crown	Big Salmon River Watershed
30153712	Crown	Big Salmon River Watershed
30153720	Crown	Big Salmon River Watershed
30153738	Crown	Big Salmon River Watershed
30153746	Crown	Big Salmon River Watershed
30153753	Crown	Big Salmon River Watershed
30153761	Crown	Big Salmon River Watershed
30153779	Crown	Big Salmon River Watershed
30153787	Crown	Big Salmon River Watershed
30153795	Crown	Big Salmon River Watershed
30153803	Crown	Big Salmon River Watershed
30153811	Crown	Big Salmon River Watershed
30153829	Crown	Big Salmon River Watershed
30153837	Crown	Big Salmon River Watershed
30153845	Crown	Big Salmon River Watershed
30153852	Crown	Big Salmon River Watershed
30153860	Crown	Big Salmon River Watershed
30153886	Crown	Big Salmon River Watershed
30153894	Crown	Big Salmon River Watershed
30153902	Crown	Big Salmon River Watershed
30153910	Crown	Big Salmon River Watershed
30153928	Crown	Big Salmon River Watershed
30153944	Crown	Big Salmon River Watershed
30153951	Crown	Big Salmon River Watershed
30153969	Crown	Big Salmon River Watershed
30153977	Crown	Big Salmon River Watershed
30153985	Crown	Big Salmon River Watershed
30153993	Crown	Big Salmon River Watershed
30154009	Crown	Big Salmon River Watershed
30154017	Crown	Big Salmon River Watershed
30154025	Crown	Big Salmon River Watershed
30154033	Crown	Big Salmon River Watershed

30154041	Crown	Big Salmon River Watershed
30154058	Crown	Big Salmon River Watershed
30154066	Crown	Big Salmon River Watershed
30154074	Crown	Big Salmon River Watershed
30154082	Crown	Big Salmon River Watershed
30154090	Crown	Big Salmon River Watershed
30154108	Crown	Big Salmon River Watershed
30154116	Crown	Big Salmon River Watershed
30154124	Crown	Big Salmon River Watershed
30154132	Crown	Big Salmon River Watershed
30154140	Crown	Big Salmon River Watershed
30154157	Crown	Big Salmon River Watershed
30154165	Crown	Big Salmon River Watershed
30154751	Crown	Big Salmon River Watershed
30154793	Crown	Big Salmon River Watershed
30154884	Crown	Big Salmon River Watershed
30154892	Crown	Big Salmon River Watershed
30154900	Crown	Big Salmon River Watershed
30154918	Crown	Big Salmon River Watershed
30156673	Crown	Big Salmon River Watershed
30156681	Crown	Big Salmon River Watershed
30156699	Crown	Big Salmon River Watershed
30156707	Crown	Big Salmon River Watershed
30156715	Crown	Big Salmon River Watershed
30156723	Crown	Big Salmon River Watershed
30156731	Crown	Big Salmon River Watershed
30156749	Crown	Big Salmon River Watershed
30156756	Crown	Big Salmon River Watershed
30156764	Crown	Big Salmon River Watershed
30156772	Crown	Big Salmon River Watershed
30156780	Crown	Big Salmon River Watershed
30156798	Crown	Big Salmon River Watershed
30156806	Crown	Big Salmon River Watershed
30156814	Crown	Big Salmon River Watershed
30156822	Crown	Big Salmon River Watershed

30156830	Crown	Big Salmon River Watershed
30156848	Crown	Big Salmon River Watershed
30156855	Crown	Big Salmon River Watershed
30156863	Crown	Big Salmon River Watershed
30156871	Crown	Big Salmon River Watershed
30156889	Crown	Big Salmon River Watershed
30156897	Crown	Big Salmon River Watershed
30156913	Crown	Big Salmon River Watershed
30156947	Crown	Big Salmon River Watershed
30156954	Crown	Big Salmon River Watershed
30156962	Crown	Big Salmon River Watershed
30156970	Crown	Big Salmon River Watershed
30156988	Crown	Big Salmon River Watershed
30156996	Crown	Big Salmon River Watershed
30157002	Crown	Big Salmon River Watershed
30157010	Crown	Big Salmon River Watershed
30157028	Crown	Big Salmon River Watershed
30157044	Crown	Big Salmon River Watershed
30157051	Crown	Big Salmon River Watershed
30157069	Crown	Big Salmon River Watershed
30157077	Crown	Big Salmon River Watershed
30157085	Crown	Big Salmon River Watershed
30157093	Crown	Big Salmon River Watershed
30157101	Crown	Big Salmon River Watershed
30164941	Crown	Big Salmon River Watershed
30164958	Crown	Big Salmon River Watershed
30181309	Crown	Big Salmon River Watershed
30201578	Crown	Big Salmon River Watershed
30244230	Crown	Big Salmon River Watershed
30316277	Crown	Big Salmon River Watershed
30327969	Crown	Big Salmon River Watershed
30328348	Crown	Big Salmon River Watershed
30328371	Crown	Big Salmon River Watershed
30334049	Crown	Big Salmon River Watershed
30342703	Crown	Big Salmon River Watershed

30345540	Crown	Big Salmon River Watershed
5103444	Crown	Big Salmon River Watershed
55005771	Crown	Big Salmon River Watershed
55063010	Crown	Big Salmon River Watershed
55103055	Crown	Big Salmon River Watershed
55103063	Crown	Big Salmon River Watershed
55103071	Crown	Big Salmon River Watershed
55103089	Crown	Big Salmon River Watershed
55103097	Crown	Big Salmon River Watershed
55103105	Crown	Big Salmon River Watershed
55103113	Crown	Big Salmon River Watershed
55103121	Crown	Big Salmon River Watershed
55103139	Crown	Big Salmon River Watershed
55103147	Crown	Big Salmon River Watershed
55103154	Crown	Big Salmon River Watershed
55103162	Crown	Big Salmon River Watershed
55103170	Crown	Big Salmon River Watershed
55103188	Crown	Big Salmon River Watershed
55103196	Crown	Big Salmon River Watershed
55103204	Crown	Big Salmon River Watershed
55103212	Crown	Big Salmon River Watershed
55103220	Crown	Big Salmon River Watershed
55103279	Crown	Big Salmon River Watershed
55103287	Crown	Big Salmon River Watershed
55103295	Crown	Big Salmon River Watershed
55103303	Crown	Big Salmon River Watershed
55103337	Crown	Big Salmon River Watershed
55103360	Crown	Big Salmon River Watershed
55103378	Crown	Big Salmon River Watershed
55103386	Crown	Big Salmon River Watershed
55103394	Crown	Big Salmon River Watershed
55103402	Crown	Big Salmon River Watershed
55103410	Crown	Big Salmon River Watershed
55103428	Crown	Big Salmon River Watershed
55103436	Crown	Big Salmon River Watershed

55103451	Crown	Big Salmon River Watershed
55103469	Crown	Big Salmon River Watershed
55103477	Crown	Big Salmon River Watershed
55103485	Crown	Big Salmon River Watershed
55103493	Crown	Big Salmon River Watershed
55103501	Crown	Big Salmon River Watershed
55103519	Crown	Big Salmon River Watershed
55103527	Crown	Big Salmon River Watershed
55103535	Crown	Big Salmon River Watershed
55103543	Crown	Big Salmon River Watershed
55103550	Crown	Big Salmon River Watershed
55103568	Crown	Big Salmon River Watershed
55103576	Crown	Big Salmon River Watershed
55103584	Crown	Big Salmon River Watershed
55103592	Crown	Big Salmon River Watershed
55103600	Crown	Big Salmon River Watershed
55103618	Crown	Big Salmon River Watershed
55103626	Crown	Big Salmon River Watershed
55103634	Crown	Big Salmon River Watershed
55103642	Crown	Big Salmon River Watershed
55103659	Crown	Big Salmon River Watershed
55103667	Crown	Big Salmon River Watershed
55103675	Crown	Big Salmon River Watershed
55103683	Crown	Big Salmon River Watershed
55103691	Crown	Big Salmon River Watershed
55103709	Crown	Big Salmon River Watershed
55103717	Crown	Big Salmon River Watershed
55103725	Crown	Big Salmon River Watershed
55103733	Crown	Big Salmon River Watershed
55103741	Crown	Big Salmon River Watershed
55103758	Crown	Big Salmon River Watershed
55103766	Crown	Big Salmon River Watershed
55103774	Crown	Big Salmon River Watershed
55103782	Crown	Big Salmon River Watershed
55103790	Crown	Big Salmon River Watershed

55103808	Crown	Big Salmon River Watershed
55103816	Crown	Big Salmon River Watershed
55103824	Crown	Big Salmon River Watershed
55103832	Crown	Big Salmon River Watershed
55103840	Crown	Big Salmon River Watershed
55103857	Crown	Big Salmon River Watershed
55103865	Crown	Big Salmon River Watershed
55103873	Crown	Big Salmon River Watershed
55103881	Crown	Big Salmon River Watershed
55103899	Crown	Big Salmon River Watershed
55103907	Crown	Big Salmon River Watershed
55103915	Crown	Big Salmon River Watershed
55103956	Crown	Big Salmon River Watershed
55103964	Crown	Big Salmon River Watershed
55103972	Crown	Big Salmon River Watershed
55103980	Crown	Big Salmon River Watershed
55103998	Crown	Big Salmon River Watershed
55104004	Crown	Big Salmon River Watershed
55104012	Crown	Big Salmon River Watershed
55104020	Crown	Big Salmon River Watershed
55104038	Crown	Big Salmon River Watershed
55104046	Crown	Big Salmon River Watershed
55104053	Crown	Big Salmon River Watershed
55104061	Crown	Big Salmon River Watershed
55104079	Crown	Big Salmon River Watershed
55104087	Crown	Big Salmon River Watershed
55104095	Crown	Big Salmon River Watershed
55104103	Crown	Big Salmon River Watershed
55104111	Crown	Big Salmon River Watershed
55104129	Crown	Big Salmon River Watershed
55104137	Crown	Big Salmon River Watershed
55104145	Crown	Big Salmon River Watershed
55104152	Crown	Big Salmon River Watershed
55104160	Crown	Big Salmon River Watershed
55104178	Crown	Big Salmon River Watershed

55104186	Crown	Big Salmon River Watershed
55104194	Crown	Big Salmon River Watershed
55104202	Crown	Big Salmon River Watershed
55104210	Crown	Big Salmon River Watershed
55104244	Crown	Big Salmon River Watershed
55104251	Crown	Big Salmon River Watershed
55104269	Crown	Big Salmon River Watershed
55104277	Crown	Big Salmon River Watershed
55104285	Crown	Big Salmon River Watershed
55104293	Crown	Big Salmon River Watershed
55104301	Crown	Big Salmon River Watershed
55104319	Crown	Big Salmon River Watershed
55104327	Crown	Big Salmon River Watershed
55104335	Crown	Big Salmon River Watershed
55104343	Crown	Big Salmon River Watershed
55104350	Crown	Big Salmon River Watershed
55104376	Crown	Big Salmon River Watershed
55104558	Crown	Big Salmon River Watershed
55104582	Crown	Big Salmon River Watershed
55105498	Crown	Big Salmon River Watershed
55105506	Crown	Big Salmon River Watershed
55105522	Crown	Big Salmon River Watershed
55105530	Crown	Big Salmon River Watershed
55105548	Crown	Big Salmon River Watershed
55105555	Crown	Big Salmon River Watershed
55105597	Crown	Big Salmon River Watershed
55105605	Crown	Big Salmon River Watershed
55105613	Crown	Big Salmon River Watershed
55105621	Crown	Big Salmon River Watershed
55105647	Crown	Big Salmon River Watershed
55105654	Crown	Big Salmon River Watershed
55105662	Crown	Big Salmon River Watershed
55105670	Crown	Big Salmon River Watershed
55105688	Crown	Big Salmon River Watershed
55105696	Crown	Big Salmon River Watershed

55105704	Crown	Big Salmon River Watershed
55105712	Crown	Big Salmon River Watershed
55105738	Crown	Big Salmon River Watershed
55105746	Crown	Big Salmon River Watershed
55105761	Crown	Big Salmon River Watershed
55105779	Crown	Big Salmon River Watershed
55105787	Crown	Big Salmon River Watershed
55105795	Crown	Big Salmon River Watershed
55105803	Crown	Big Salmon River Watershed
55105811	Crown	Big Salmon River Watershed
55105820	Crown	Big Salmon River Watershed
55105829	Crown	Big Salmon River Watershed
55105837	Crown	Big Salmon River Watershed
55105878	Crown	Big Salmon River Watershed
55105886	Crown	Big Salmon River Watershed
55105894	Crown	Big Salmon River Watershed
55142228	Crown	Big Salmon River Watershed
55204382	Crown	Big Salmon River Watershed
55204390	Crown	Big Salmon River Watershed
55204671	Crown	Big Salmon River Watershed
55204739	Crown	Big Salmon River Watershed
55204747	Crown	Big Salmon River Watershed
55204754	Crown	Big Salmon River Watershed
55204770	Crown	Big Salmon River Watershed
55230486	Crown	Big Salmon River Watershed
55230494	Crown	Big Salmon River Watershed
55230502	Crown	Big Salmon River Watershed
55230510	Crown	Big Salmon River Watershed
55230536	Crown	Big Salmon River Watershed
55230916	Crown	Big Salmon River Watershed
55232979	Crown	Big Salmon River Watershed
55234538	Crown	Big Salmon River Watershed
20457628	Crown	Burnt Church/Esgenooetitj
20863643	Crown	Burnt Church/Esgenooetitj
20868519	Crown	Burnt Church/Esgenooetitj



20868527	Crown	Burnt Church/EsgenooPETITj
20868584	Crown	Burnt Church/EsgenooPETITj
40102121	Crown	Burnt Church/EsgenooPETITj
40102139	Crown	Burnt Church/EsgenooPETITj
40280471	Crown	Burnt Church/EsgenooPETITj
40281065	Crown	Burnt Church/EsgenooPETITj
40281073	Crown	Burnt Church/EsgenooPETITj
40281073	Crown	Burnt Church/EsgenooPETITj
40337958	Crown	Burnt Church/EsgenooPETITj
40414237	Crown	Burnt Church/EsgenooPETITj
40459406	Crown	Burnt Church/EsgenooPETITj
40540833	Crown	Burnt Church/EsgenooPETITj
40540841	Crown	Burnt Church/EsgenooPETITj
40540924	Crown	Burnt Church/EsgenooPETITj
00611525	Crown	Caledonia
00611541	Crown	Caledonia
00611723	Crown	Caledonia
00611806	Crown	Caledonia
00611830	Crown	Caledonia
00613562	Crown	Caledonia
00613737	Crown	Caledonia
00613794	Crown	Caledonia
00627851	Crown	Caledonia
00627901	Crown	Caledonia
00628008	Crown	Caledonia
00628065	Crown	Caledonia
00628073	Crown	Caledonia
05002027	Crown	Caledonia
70400338	Crown	Chignecto Isthmus/Tantramar Marsh
50070853	Crown	Dalhousie
50071042	Crown	Dalhousie
50071661	Crown	Dalhousie
50087402	Crown	Dalhousie
50184001	Crown	Dalhousie
50184027	Crown	Dalhousie
2812619		

50184035	Crown	Dalhousie
50192152	Crown	Dalhousie
50192558	Crown	Dalhousie
50192566	Crown	Dalhousie
50192616	Crown	Dalhousie
50192640	Crown	Dalhousie
50192921	Crown	Dalhousie
50193127	Crown	Dalhousie
50193614	Crown	Dalhousie
50207687	Crown	Dalhousie
50228980	Crown	Dalhousie
50264548	Crown	Dalhousie
50264555	Crown	Dalhousie
50338789	Crown	Dalhousie
50338797	Crown	Dalhousie
50340413	Crown	Dalhousie
50343789	Crown	Dalhousie
50347350	Crown	Dalhousie
40294993	Crown	Kouchibouguac and Coast
40346800	Crown	Kouchibouguac and Coast
40356800	Crown	Kouchibouguac and Coast
00606772	Crown	Lewis Mountain
00607267	Crown	Lewis Mountain
00618322	Crown	Lewis Mountain
00618355	Crown	Lewis Mountain
00726117	Crown	Lewis Mountain
01104579	Crown	Lewis Mountain
05002928	Crown	Lewis Mountain
05003132	Crown	Lewis Mountain
05008925	Crown	Lewis Mountain
05074257	Crown	Lewis Mountain
05074273	Crown	Lewis Mountain
40103673	Crown	Miramichi Watershed
40123242	Crown	Miramichi Watershed
40123606	Crown	Miramichi Watershed
2812619		

40125501	Crown	Miramichi Watershed
40127250	Crown	Miramichi Watershed
40130361	Crown	Miramichi Watershed
40132516	Crown	Miramichi Watershed
40135030	Crown	Miramichi Watershed
40135105	Crown	Miramichi Watershed
40186553	Crown	Miramichi Watershed
40295933	Crown	Miramichi Watershed
40295966	Crown	Miramichi Watershed
40295990	Crown	Miramichi Watershed
40316929	Crown	Miramichi Watershed
40317436	Crown	Miramichi Watershed
40317455	Crown	Miramichi Watershed
40317471	Crown	Miramichi Watershed
40317489	Crown	Miramichi Watershed
40332132	Crown	Miramichi Watershed
40332132	Crown	Miramichi Watershed
40333718	Crown	Miramichi Watershed
40344723	Crown	Miramichi Watershed
40467441	Crown	Miramichi Watershed
40540676	Crown	Miramichi Watershed
40540916	Crown	Miramichi Watershed
40540932	Crown	Miramichi Watershed
40541468	Crown	Miramichi Watershed
40541476	Crown	Miramichi Watershed
20017380	Crown	Miramichi Watershed
20379624	Crown	Nepisiguit Watershed/Bay
20665675	Crown	Nepisiguit Watershed/Bay
40126948	Crown	Nepisiguit Watershed/Bay
40235178	Crown	Nepisiguit Watershed/Bay
40541187	Crown	Nepisiguit Watershed/Bay
50071885	Crown	Nepisiguit Watershed/Bay
50183946	Crown	Nepisiguit Watershed/Bay

**SCHEDULE "C"  
DISTRICT MAP**

