



Affleck Greene McMurtry LLP

Barristers and Solicitors

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June 9, 2014

File: 2848-002

BY EMAIL (at apachai@toronto.ca)

Ms Ansuya Pachai
City Solicitor's Office
City of Toronto, Legal Services
Station 1260, 26th Floor
Metro Hall
55 John St
Toronto ON M5V 3C6

Dear Ms Pachai:

Re: Toronto Taxi Alliance Inc. vs. City of Toronto
Court File No.: Cv-14-502614
General Bills Items BL52.1

You have advised us on a number of occasions that the City intends to introduce at its June 10/11 meeting a Bill relating to the taxicab licensing revisions adopted by Toronto's City Council on February 19, 2014 (confirmatory by-law 145-2014, Item LS26.01). We have also been advised by the City Clerk, Karen Lunn, in her email to me of June 6, 2014 that it is her information that a Bill for this item is expected for the June 10/11 meeting.

The City has been aware since April 24, 2014 of our client's intention to move for an injunction preventing the implementation of these reforms, which are proposed to take effect July 1, 2014 if and when a bill was introduced. The City of Toronto undertook to provide us with notice of the impending Bill, and a copy of the text of the new by-law in advance of the meeting, so that our client could respond accordingly. City Council's meeting is tomorrow and we have yet to receive any such information from the City. Similarly, the Agenda and supplementary Agenda for tomorrow's meeting, as posted on the City of Toronto website, does not make any reference to a Bill relating to the taxicab licensing revisions.

It is inconceivable how, at this point in time, the City can in good faith introduce this Bill for consideration by City Council at its meeting on June 10/11. The proposed changes to the taxicab by-laws are substantial and require a massive overhaul to portions of Chapter

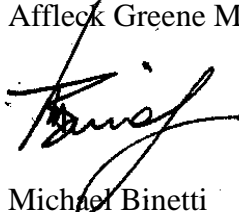
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545 of Toronto's Municipal Code. How are Councillors or the public supposed to have time to properly review the substantial amendments to Chapter 545 and feel confident that these amendments accurately reflect what was adopted by City Council on February 19, 2014? If this Bill is added to the Agenda at the 11th hour, and the City pushes through these substantial amendments without proper due process, this will be yet another act of bad faith on the part of the City.

If the City is seeking to introduce this Bill at the Council meeting within the two days, the City's legal department must certainly have a draft of the amendments in its possession. As such, we request that the City immediately provide us with a copy of the proposed Bill, or otherwise advise us as to the status of the Bill, so that our client can determine how to appropriately respond in order to best protect its rights and interests.

Sincerely,
Affleck Greene McMurtry LLP



Michael Binetti
MIB/id

cc: City Clerk's Office at clerk@toronto.ca;
Karen Lunn at klunn@toronto.ca
All members of Council