

**Form 13-31**  
(Rule 13-31)

COURT FILE NUMBER **Q.B.G. No. 1059 of 2008**

COURT OF QUEEN'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE **REGINA**

PLAINTIFFS **THE SASKATCHEWAN FEDERATION OF  
LABOUR (IN ITS OWN RIGHT AND ON BEHALF  
OF THE UNIONS AND WORKERS IN THE  
PROVINCE OF SASKATCHEWAN PER  
ATTACHED SCHEDULE A)**

RESPONDENT  
(DEFENDANT) **HER MAJESTY THE QUEEN, IN RIGHT OF THE  
PROVINCE OF SASKATCHEWAN**

UNION INTERVENORS **SERVICE EMPLOYEES INTERNATIONAL UNION  
(WEST), CANADIAN UNION OF PUBLIC  
EMPLOYEES & SASKATCHEWAN UNION OF  
NURSES**

EMPLOYER  
INTERVENORS **REGINA QU'APPELLE REGIONAL HEALTH  
AUTHORITY, CYPRESS HEALTH AUTHORITY,  
FIVE HILLS REGIONAL HEALTH AUTHORITY,  
SASKATOON REGIONAL HEALTH AUTHORITY,  
HEARTLAND REGIONAL HEALTH AUTHORITY,  
SUNRISE REGIONAL HEALTH AUTHORITY,  
PRINCE ALBERT PARKLAND REGIONAL  
HEALTH AUTHORITY**

Clerk's Stamp

**AFFIDAVIT**

AFFIDAVIT OF PAM RUSSELL

I, PAM RUSSELL, of the City of Regina, in the Province of Saskatchewan, MAKE OATH AND SAY THAT (or AFFIRM):

1. I was a member of the Plaintiff SJBRWDSU local 568 ("Union") for over thirty years including all of the term of my employment with the Intervenor RQHR at the hospital laundry in Regina.
2. During my employment I performed most of the various jobs at the laundry and eventually worked my way up to become a Supervisor in-scope and am very proud of my work history and work ethic.

3. I recall to this very day when I became a union member and accepted becoming our workplace representative on our Occupational Health and Safety Committee because the work had many dangers I was worried about.
4. Later, because of the associations I made through this role I became active in other ways with my Union including becoming a shop steward, acting as Chief Steward, a member of the bargaining committee and the joint job evaluation committee.
5. I attended conferences, conventions and meetings of my Union local, my provincial Union, the Saskatchewan Federation of Labour for most of my career at the laundry and was a member of the bargaining committee with my friend and colleague Reina Polsom until we lost our jobs, our collective agreement and our union on November 9, 2015.
6. I can say that outside of my actual family, the relationships with my union grew into the most trusting, intimate bonds in my life, just as if they were my family.
7. They became my brothers and sisters that were part of my everyday life and for many, many events that families share.
8. We shared common desire to build a safer and better workplace with equal pay for women since many of the higher paid jobs were almost only men at first.
9. We worked together in common unity to protect each other from unfairness and to actually make the world in Regina, in Saskatchewan and generally better for all.
10. These goals were part of our Constitution and were reflected in the resolutions we debated and passed at or local, provincial and national levels within our organizations.
11. I got to learn about issues of concern as a citizen and my obligations regarding them.
12. I felt a safety and a trust that gave me confidence as a woman and as a citizen to speak up and to talk about working conditions, equality, racism, sexual harassment, childcare, maternity leave, sick leave, benefits, human rights, hours of works, benefits, human rights, hours of work, equal pay, health and safety, job classifications, and other larger issues such as politics and world issues.
13. I learned, through my association, that thousands of people worked in common for a fairer society that I was part of.

14. I gained skills in first aid, collective bargaining, communication, mediation, organizing, dispute resolution and training/leadership through my union.
15. I gained in self - esteem and confidence through my work as a steward in assisting co-workers with issues and which helped me feel good about being qualified to become a supervisor and succeed as such.
16. It is hard to describe what it meant to not feel alone and unheard as a person and as a young woman in our world when I went to union meetings and events. It was quite simply awesome.
17. I learned about unity and the value of collective work and being part of associations including my responsibilities to the collective and to society.
18. It was very hard to work on improving working conditions and make gains the moment the Defendant Government announced it was going to take away my right, our right to bargain collectively essentially because we could not strike if our employer designated us as essential, facing fines and maybe even jail if we did.
19. The freedom to strike was a fundamental and necessary part of our ability to attempt to make our union, our association, able to be of use to our co-workers.
20. Without the threat even of strike action, we were unable to do much to protect our rights and even though organizing for, having and exercising the freedom to strike was a primary and fundamental activity in teaching our union members at work about their own empowerment and strength as a collective association, we could no longer do that for fear of serious consequences.
21. When the Defendant Government in conjunction with our employer Intervenor RQHR and their agents decided to abolish our jobs and our union and our collective agreement by privatizing our work and closing our laundry on November 9, 2015, we were powerless to stop it.
22. Without the freedom to strike, let alone the threat of lawfully doing so, we were unable to collectively bargain to stop our job loss, our loss of our collective agreement and our union – our association and its rights nor to even mitigate those losses.
23. I lost what had been what felt like my family and best friends – forever and I was and still am unable to talk about it without tears.

24. Through our union, our association, which we belonged to and organized and democratically operated and spent a significant amount of our time and thoughts on, we learned to be better people, better citizens and had fun in safety, particularly as women.
25. We did good and made society in Regina and this world better because of that, especially for my children, our children.
26. My brothers and sisters, as we learned to call each other, had my back and I theirs and that is irreplaceable as an experience and something I miss very much.
27. The emotional stress this has taken on me personally has been enormous. I felt like I was told I was dying. My whole life was going to be over. I had turned fifty years old and even though I had 35 years with Intervenor RQHR it mean't nothing. I have grade twelve and that's it. I was not qualified with any certificates to go out there and start over. I have children, am a single mom, a car and a house to maintain.
28. I am proud to have been asked to make his Affidavit even though it is tough to relive this loss in so many ways.
29. I make it however in support of my Union and all others who seek the remedies available for a loss of the human right to freedom of association, a freedom that I got to experience in the most meaningful productive way to improve our lives and the lives of all.

SWORN (OR AFFIRMED) BEFORE ME

at, Regina, Saskatchewan,

this 3rd day of August,

2016

\_\_\_\_\_  
Commissioner for Oaths  
for Saskatchewan  
or  
a Lawyer

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\_\_\_\_\_  
(Pam Russell)