IN THE SUPREME COURT OF CANADA

(ON APPEAL FROM THE COURT OF APPEAL FOR BRITISH COLUMBIA)

Court File No. 36068

BARRETT RICHARD JORDAN

APPELLANT
(Appellant)

and

HER MAJESTY THE QUEEN

RESPONDENT
(Respondent)

and

ATTORNEY GENERAL FOR ALBERTA, CRIMINAL LAWYERS' ASSOCIATION (ONTARIO) AND BRITISH COLUMBIA CIVIL LIBERTIES ASSOCIATION

INTERVENERS

(ON APPEAL FROM THE COURT OF APPEAL FOR ONTARIO)

Court File No. 36112

HER MAJESTY THE QUEEN

APPELLANT
(Respondent)

and

KENNETH GAVIN WILLIAMSON

RESPONDENT
(Appellant)

and

ATTORNEY GENERAL FOR ALBERTA, BRITISH COLUMBIA CIVIL LIBERTIES ASSOCIATION AND CRIMINAL LAWYERS' ASSOCIATION (ONTARIO)

INTERVENERS

FACTUM OF THE INTERVENER, BRITISH COLUMBIA CIVIL LIBERTIES ASSOCIATION

(Rule 42 of the *Supreme Court Rules*)

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TABLE OF CONTENTS

PART I - OVERVIEW

1. At the heart of these appeals is the broad issue of how and when "institutional delay" caused by a shortage of judges, courtrooms or essential court staff breaches an accused's right to be "tried within a reasonable time" pursuant to s. 11(b) of the *Charter*. Overlaying this issue is this Court's judgment in *R. v. Morin*,[1] in which it set out guidelines by which to assess the reasonableness of delay. These appeals reveal points in that judgment that require clarification. Do the guidelines apply to the whole period of delay, from the laying of charges to the conclusion of trial (less any delay waived by the accused), or do they apply only to truly institutional delay? Is a breach of s. 11(b) made out only when the particular accused at issue has been actually prejudiced by the delay, or should prejudice be inferred from long delay? And does institutional delay that *alone* exceeds the *Morin* guidelines constitute a breach?

2. The Crowns in these two appeals both argue for a case-by-case approach in which the assessment of actual prejudice to the accused is the determining factor. The Crown in *R. v. Williamson*[2] takes the position that it is wrong to *always* infer prejudice where institutional delay itself exceeds the *Morin* guidelines.[3] Similarly, the Crown in *R. v. Jordan*[4] contends that, where an accused is unable to establish substantial prejudice, institutional delay may extend "well beyond" the *Morin* guidelines.[5] Those guidelines specify eight to 10 months in provincial courts, and six to eight months in the superior trial court. The period from the laying of charges to the conclusion of trial was 35 months in *Williamson* and 45 months in *Jordan*. In each, institutional delay constituted the largest component of the delay.

3. The Crowns' case-by-case approach deprives the right to trial within a reasonable time of much of its meaning and, in cases involving long institutional delay, fails to account for the systemic quality of that delay and will disincentivize the Crown from fulfilling its constitutional duty to provide sufficient judicial resources to allow for timely trials. Instead, this Court should affirm that the *Morin* guidelines apply to the whole period from charge through trial (less any time waived by the accused), and that prejudice to the accused can and should be inferred from long

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[1] [1992] 1 S.C.R. 771 [*Morin*].
[2] 2011 ONSC 5930, rev'd 2014 ONCA 598 [*Williamson*].
[3] Appellant's Factum (*Williamson*) at para. 33.
[4] 2012 BCSC 1735, aff'd 2014 BCCA 241 [*Jordan*].
[5] Respondent's Factum (*Jordan*) at para. 55.

delay. Moreover, in cases involving long institutional delay, prejudice to the accused should play a reduced role because such delay raises a strong presumption that the Crown is failing to meet its constitutional duty to properly resource the system and that other accused are also experiencing institutional delay as a result. In cases where the period of institutional delay alone exceeds the *Morin* guidelines, s. 11(b) should be found to have been breached without any need for an inquiry as to whether the accused suffered actual or inferred prejudice.

PART II - POSITION ON THE QUESTIONS IN ISSUE

4. The BCCLA will confine its submissions to the issue of how institutional delay and prejudice to the accused should be treated under s. 11(b) of the *Charter*.

PART III - ARGUMENT

A. Section 11(b) must properly account for the systemic quality of institutional delay

5. This Court has long recognized that institutional delay poses unique challenges in the s. 11(b) context. Although dissenting in *R. v. Mills*, Lamer J. (as he then was) rightly described institutional delay as "the acid test of s. 11(b)".[6] Indeed, far from bearing "less weight" than Crown delay, as the BC Supreme Court held in *Jordan*, institutional delay deserves particular concern in the s. 11(b) analysis.

6. Institutional delay by its very nature suggests that the delay at issue is not confined to the particular case at bar but is rather widespread and systemic; indeed, this form of delay is often referred to as *systemic delay* for that reason.[7] Institutional or systemic delay is defined as "the period that starts to run when the parties are ready for trial but the system cannot accommodate them", such as because of a "shortage of judges or courtrooms and essential court staff".[8] While it *could* be that institutional delay is the product of some unusual set of circumstances isolated to a particular case (a scenario that would be relevant to the analysis, as discussed further below), the strong presumption must be that institutional delay represents a systemic problem afflicting the local justice system more broadly and delaying a range of trials beyond the case at issue.

7. As a result of the systemic quality of institutional delay, the interests that it prejudices are not limited to those of the individual accused. Indeed, not only does truly systemic delay affect

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[6] *R. v. Mills*, [1986] 1 S.C.R. 863 at p. 940 [*Mills*].
[7] *Morin*, *supra* note 1 at p. 791.
[8] *Ibid.* at pp. 794-795.

other accused, but it also undermines a range of broader societal interests associated with timely and fair trials. As this Court has recognized in *R. v. Askov*[9] and *Morin*, while s. 11(b) is primarily concerned with the protection of the individual rights of particular accused, it has a secondary community or societal purpose in "seeing that the least fortunate of its citizens who are accused of crimes are treated humanely and fairly".[10] As Cory J. observed in *Askov*, a timely resolution to the charges allows for speedy reintegration of the innocent into society and for judgment and punishment of the guilty, both of which are of the highest public interest, and the latter of which is particularly important to victims.[11] Timely trials are also likely to lead to better, more dependable justice, since memories fade over time and witnesses can become unavailable. Consequently, delay in the justice system corrodes the community's faith in that system, as Sopinka J. implied in *Morin*[12] and as Cory J. stated in *Askov* this way:[13]

> The failure of the justice system to deal fairly, quickly and efficiently with criminal trials inevitably leads to the community's frustration with the judicial system and eventually to a feeling of contempt for court procedures... It is no exaggeration to say that a fair and balanced criminal justice system simply cannot exist without the support of the community. Continued community support for our system will not endure in the face of lengthy and unreasonable delays.

8. Plainly the community's faith in the justice system must be threatened all the more where the source of the delay is not Crown counsel's conduct in an individual case, but rather shortages of institutional resources that affect the system more broadly. Excessive institutional delay threatens access to justice[14] on a systemic level and is therefore a direct and potent challenge to the proper administration of justice in Canada and our commitment to the rule of law.

9. This Court has accordingly stated strongly and clearly that, not only is it "the duty of the Crown to bring the accused to trial", but it is also "the Crown which is responsible for the

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[9] *R. v. Askov*, [1990] 2 S.C.R. 1199 [*Askov*].
[10] *Morin*, *supra* note 1 at p. 786.
[11] *Askov*, *supra* note 9 at pp. 1220-1221.
[12] *Morin*, *supra* note 1 at p. 786.
[13] *Askov*, *supra* note 9 at p. 1221.
[14] *Mission Institution v. Khela*, 2014 SCC 24, [2014] 1 S.C.R. 502 at para. 3 (Lebel J. stressed "the importance of swift access to justice for those who have been unlawfully deprived of their liberty"); *May v. Ferndale Institution*, 2005 SCC 82, [2005] 3 S.C.R. 809 at para. 70 (Lebel and Fish JJ., writing for the majority, stated that "[a]ccess to justice is closely linked to timeliness of relief"); *R. v. St-Cloud*, 2015 SCC 27 at para. 79 (Wagner J. stated that "a reasonable member of the public... expects that someone charged with a crime will be tried within a reasonable period of time, and is aware of the adage that 'justice delayed is justice denied'").

provision of facilities and staff to see that accused persons are tried in a reasonable time."[15] In *Morin*, Sopinka J. held that s. 11(b) fixes on government "a constitutional obligation to commit sufficient resources to prevent unreasonable delay".[16]

10. A central function of s. 11(b), therefore, is to ensure that government commits sufficient resources to the justice system because "the criterion of institutional resources, more than any other, threatens to become a source of justification for prolonged and unacceptable delay."[17] Indeed, systemic delay arising from insufficient resources in the Canadian criminal justice system is a real and pressing concern. Numerous reports and studies from jurisdictions across the country have raised alarm about the failure of criminal cases to reach trial in a timely manner.[18] The issue of delay has certainly proved problematic in British Columbia. In 2010, the Provincial Court of British Columbia issued a report documenting problems of severe resource shortages in the BC Provincial Court system.[19] It warned of a significant decrease in that court's judicial complement since 2005 and the resulting inability of the court to keep pace with the volume of new cases. The report noted that, as of March 31, 2010, more than 2,000 criminal cases (13% of all criminal cases in the system) had been pending for more than 18 months and were at risk of being stayed for unreasonable delay.[20] An updated report provided by the Provincial Court in 2011 revealed that the number of cases pending for more than 18 months had risen to 18%.[21]

B. Prejudice may be inferred and excessive institutional delay can breach s. 11(b) even in the absence of actual prejudice to the accused

11. As the primary focus of s. 11(b) is the individual interests of the accused, this Court has made clear that a critical factor in many cases will be the prejudice suffered by an individual accused occasioned by the delay. As Sopinka J. stated in *Morin*, "[i]n circumstances in which

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[15] *Ibid*., per Cory J., at p. 1225.
[16] *Morin*, *supra* note 1 at p. 795.
[17] *Askov*, *supra* note 9, per Cory J., at p. 1225, quoting with approval *Mills*, *supra* note 6, per Lamer J., at p. 935.
[18] Alberta Justice and Solicitor General, *Injecting a Sense of Urgency: A New Approach to Delivering Justice in Serious and Violent Criminal Cases* (2013); BC Justice Reform Initiative, *A Criminal Justice System for the 21st Century: Final Report to the Minister of Justice and Attorney General* (2012); Provincial Court of British Columbia, *Justice Delayed: A Report of the Provincial Court of British Columbia Concerning Judicial Resources* (2010) [*Justice Delayed*]; Newfoundland and Labrador, *Report of the Task Force on Criminal Justice Efficiencies* (2008); Department of Justice of Canada, *Final Report on Early Case Consideration of the Steering Committee on Justice Efficiencies and Access to the Justice System* (2006).
[19] *Justice Delayed*, *supra* note 18.
[20] *Ibid.* at pp. 2, 22-23.
[21] Provincial Court of British Columbia, *Time to Trial: Updates (as of September 30, 2011)* at p. 3. Further updates can be found at www.provincialcourt.bc.ca/news-reports/court-reports.

prejudice is not inferred and is not otherwise proved, the basis for the enforcement of the individual right is seriously undermined."[22]

12. As seen in that sentence, however, prejudice to the accused can be inferred simply from the fact of any long period of delay that counts against the Crown, including institutional delay and Crown delay. Proof of actual prejudice is not necessary. This Court stated that point clearly in *Morin*[23] and more recently in *R. v. Godin*: "prejudice may be inferred from the length of the delay. The longer the delay the more likely that such an inference will be drawn."[24] Indeed, in *Askov*, Cory J. agreed with Sopinka J.'s approach in *R. v. Smith*[25] and Lamer J.'s approach in *Mills* and *R. v. Rahey*[26] that a very long delay creates an inference of prejudice that is "virtually irrebuttable".[27] That conclusion must be correct. In every case, long delay in getting to trial will prejudice the accused's security of the person in the sense of stress and the cloud of suspicion arising from the charge.[28]

13. Moreover, prejudice to the individual accused plays a reduced role in the s. 11(b) analysis where there has been institutional delay near or over the *Morin* guidelines. In *Morin*, Sopinka J. made clear that, where institutional delay is excessive, a s. 11(b) breach will be made out even in the absence of any prejudice at all, actual or inferred. In such a case, the presence of prejudice may reduce the tolerable period of institutional delay, and its absence may extend that period, but only by "several months in either direction".[29]

14. The considerations are different in the case of institutional delay because – as discussed above under subheading "A" – not only the particular accused's individual rights are at issue, but also the spectre of other accused affected by the same shortage of institutional resources, and the direct threat to the community's faith in the delivery of timely, fair and dependable justice. Where the Crown has failed to provide sufficient resources to allow for a timely trial, the prejudice to the particular accused is necessarily of lesser relevance to finding a s. 11(b) breach.

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[22] *Morin*, *supra* note 1 at p. 801.
[23] *Ibid.*
[24] 2009 SCC 26, [2009] 2 S.C.R. 3 at para. 31 [*Godin*]; see also paras. 37-38.
[25] [1989] 2 S.C.R. 1120 [*Smith*].
[26] [1987] 1 S.C.R. 588 [*Rahey*].
[27] *Askov*, *supra* note 9 at p. 1230.
[28] *Godin*, *supra* note 24 at para. 30.
[29] *Morin*, *supra* note 1 at p. 807; see also p. 798.

15. Other factors related to the specific accused's circumstances are also of lesser relevance in such a case. One such factor adverted to by courts as potentially justifying delay is the concern that an accused may use delay as an "offensive weapon", as opposed to a "protective shield".[30] In light of this concern, this Court has stated that, while an accused need not actively seek a speedy trial to claim the benefit of s. 11(b),[31] "[a]ction or non-action by the accused which is inconsistent with a desire for a timely trial is something that the court must consider".[32] But again, the failure of an individual accused to push for a timely trial must be of little relevance where the Crown is failing in its constitutional obligation to sufficiently resource the justice system. Indeed, such delay is also entirely outside of the accused's control.

16. Similarly, the seriousness of the charges cannot rightly be used to justify truly excessive institutional delay. While certainly the public has a very strong interest in seeing accused brought to trial, that interest is matched by the concern to ensure that justice is timely, fair and dependable. If the system is too strained to handle the caseload, the solution is not to allow the quality of justice to degrade; it is rather to prioritize more serious cases and put more resources into the system generally.

17. In light of the above, it is our submission that the trial judge in *Jordan* was wrong to deny the accused's s. 11(b) claim in part on the basis that the accused had not suffered "substantial" prejudice and that the charges were serious.[33] Not only should substantial prejudice have been inferred from the very lengthy delay in that case (nearly 35 months), but the individual circumstances of the accused should also have been accorded far less weight in the face of the systemic concerns raised by the shortage of judicial resources.[34]

C. The Morin guidelines should be clarified to apply to the total period of delay, and to apply more strictly in cases of long institutional delay

18. While this Court in *Morin* set out the guidelines in order to frame the limits of tolerable delay, the precise application of those guidelines is not entirely clear, even in the light of

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[30] *Askov*, *supra* note 9 at p. 1222; *Morin*, *supra* note 1 at p. 802; *Jordan*, *supra* note 4 at paras. 129, 143 (despite finding that the accused had not actively contributed to the delay such that delay had been used as an "offensive weapon", the trial judge nonetheless weighed the accused's failure to proactively pursue a speedy trial against the accused's s. 11(b) *Charter* claim).

[31] *Morin*, *supra* note 1 at p. 801, citing *Smith*, *supra* note 24, with approval.

[32] *Morin*, *supra* note 1 at p. 802.

[33] *Jordan*, *supra* note 4 at para. 143.

[34] *Ibid.* at para. 140.

subsequent jurisprudence. A result is that a number of courts have denied s. 11(b) applications even in the face of delay far beyond what was contemplated in *Morin*.[35] Two aspects of this Court's jurisprudence appear to be particular sources of confusion.

19. The first is the question of whether the *Morin* guidelines apply to the entire period from charge to trial (less any time waived by the accused), or only to purely institutional delay, which begins when the parties are ready for trial and continues until the trial can actually be held. *Morin* can be read as supporting either approach. For instance, when broadly setting out the "balancing" process by which the court assesses "whether the period of delay is unreasonable", Sopinka J. clearly stated that "the period to be scrutinized is the time elapsed from the date of the charge to the end of the trial",[36] but he then discussed the guidelines specifically in relation to institutional delay.[37] Subsequent decisions of this Court have also been inconsistent. In *R. v. MacDougall*, the Court commented that inherent time requirements do not fall under the *Morin* guidelines and therefore do not count against the Crown,[38] but in *Godin* the Court clearly applied the guidelines to the whole period from the laying of the charge to the end of the trial, even though that period would necessarily include some inherent delay.[39] Ontario courts have interpreted the *Morin* guidelines as applying only to institutional delay, and not inherent delay, and have justified very long time periods from charge to the end of trial on that basis, as the appellant in *Jordan* sets out in his response factum.

20. The BCCLA urges this Court to reject the Ontario interpretation and affirm that the *Morin* guidelines apply to the whole time period from charge through trial, less any periods waived by the accused. The essential objective in *Morin* was to provide guidance as to when the time to the end

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[35] In addition to the lower courts' decisions at issue in these appeals, such decisions include: *R. v. Florence*, 2014 ONCA 443 (approximately 28 months total delay for each co-accused); *R. v. Goodkey*, 2013 BCSC 1431 (48 and 43 months total delay for each co-accused respectively); *R. v. Ghavami*, 2010 BCCA 126 (44 months total delay); *R. v. Austin*, 2009 ONCA 329 (25 months total delay); *R. v. H.(S.)*, 2008 CarswellOnt 9089, [2008] O.J. No. 5736 (Ont. S.C.J.) (35 months total delay with 1.5 months waived); *R. v. Qureshi* (2004), 2006 CarswellOnt 639427, C.R. (6th) 142 (Ont. C.A.) (51 months total delay with 7 months waived); *R. v. Seegmiller* (2004), 2007 CarswellOnt 9746, 191 C.C.C. (3d) 347 (Ont. C.A.) (35 months total delay).

[36] *Morin*, *supra* note 1 at p. 788.

[37] *Ibid*. at pp. 796-800.

[38] [1998] 3 S.C.R. 45 at paras. 44 and 47.

[39] For instance, the Court stated in *Godin*, *supra* note 24 at para. 14: "Eventually, the preliminary inquiry was held on February 5, 2007, roughly 21 months after the charges had been laid. This period is more than double the *Morin* guideline for institutional delay in the provincial courts."

of trial becomes too long to be consistent with the s. 11(b) guarantee.[40] It was to aid in that project that the Court framed the guidelines, which Sopinka J. stressed should not be applied in a purely mechanical fashion, but rather should yield to other factors.[41] The Ontario approach is inconsistent with Sopinka J.'s admonition, and rather engages in the minute examination of particular time periods that the Court eschewed in *Godin*.[42] More fundamentally, the Ontario approach allows for dramatic expansion of the tolerable period of delay and thereby drains s. 11(b) of much of its meaning. This Court should clearly reject the Ontario approach and affirm that the guidelines apply to the total period from charge through trial, less time waived by the accused.

21. Second, the BCCLA urges this Court to clarify the role that prejudice plays in the analysis, consistent with the submissions under subheading "B" above. For one thing, despite this Court's clear findings that prejudice can be inferred from the simple fact of delay, some courts have moved in the direction of requiring positive proof of actual prejudice before a s. 11(b) breach is made out. This Court should again reject this approach.

22. Perhaps more crucially, the Court should clarify that the prejudice to an individual accused plays a reduced role where there is significant institutional delay. Indeed, the longer the period of institutional delay, the less relevant should be the accused's individual circumstances, to the point where institutional delay that alone exceeds the *Morin* guidelines should be found to breach s. 11(b) even in the absence of any individual prejudice (even inferred prejudice). As Sopinka J. stated in *Morin*, "[t]here is a point in time at which the Court will no longer tolerate delay based on the plea of inadequate resources".[43] That point in time must be zealously enforced to ensure that the Crown fulfils its constitutional obligation to provide the system with the resources it needs to enable the timely, fair and dependable justice society expects and the *Charter* demands. Certainly society also has a strong interest in seeing accused brought to trial, and when faced with an application for a stay of charges actually before the court it is easy to undervalue something as amorphous and insidious as institutional delay. But courts will only ever confront the systemic

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[40] For instance, the Court stated in *Morin*, *supra* note 1 at p. 787: "The general approach to a determination as to whether the right has been denied is not by the application of a mathematical or administrative formula but rather by a judicial determination balancing the interests which the section is designed to protect against factors which either inevitably lead to delay or are otherwise the cause of delay. As I noted in *Smith*, *supra*, '[i]t is axiomatic that some delay is inevitable. The question is, at what point does the delay become unreasonable?' (p. 1131)."

[41] *Ibid*. at p. 796.

[42] *Godin*, *supra* note 24 at para. 18.

[43] *Morin*, *supra* note 1 at p. 795.

problem of institutional delay through the individual cases that come before them, and if courts too readily justify systemic delay in the interest of seeing individual accused brought to trial, then the Crown will not be held to account for failing to provide the system with the resources it needs. If the Crown is to be properly motivated to meet its s. 11(b) obligations, then it must face the threat that charges will be stayed if it fails to do so.

23. Although the presence of significant institutional delay calls for a stricter application of the *Morin* guidelines, the Crown should nonetheless still have the opportunity to explain or justify excessive institutional delay by reference to factors that are specifically relevant to such form of delay. If the Crown can demonstrate that the unavailability of judges or courtrooms or other resources in a particular case is not actually a manifestation of a systemic problem, then an extension to the *Morin* guidelines may be appropriate in the absence of significant prejudice to the individual accused. Similarly, an extension to the guidelines may be justified where the Crown can demonstrate that the delay is the temporary result of its efforts, or those of the judiciary, to tackle delay or otherwise create efficiencies. A temporary shortage of courtrooms caused by the ongoing expansion of a courthouse is a prototypical example, but longer institutional delays might also be justified by the introduction of new administrative processes that can be demonstrated to have a serious prospect for substantially reducing delay over the longer term.

24. Indeed, one of the Crown's principal aims in the *Williamson* appeal is to suggest that the delay in that case was not truly systemic, but rather arose because the accused elected a trial by judge and jury, for which the courthouse only had two courtrooms, one of which was being occupied by a long trial.[44] The Crown also submits that the Court of Appeal improperly took judicial notice of the availability of courtrooms in other courthouses within the relevant region.[45]

25. The BCCLA makes two general points on the *Williamson* appeal. The first is that courts of appeal do play an important role in the application of the *Morin* guidelines: "[t]he court of appeal in each province will play a supervisory role in seeking to achieve uniformity subject to the necessity of taking into account the special conditions and problems of different regions in the province."[46] Further, while this Court must, of course, ensure that lower courts apply s. 11(b) on

[44] Appellant's Factum (*Williamson*) at para. 19.
[45] *Ibid*. at para. 29.
[46] *Morin*, *supra* note 1 at pp. 799-800.

the basis of proper principles, "[t]he provincial courts of appeal are generally in a better position than this court to assess the reasonableness of their province's institutional limitations and resources."[47]

26. Second, while courts can extend the *Morin* guidelines if the Crown demonstrates that the institutional delay in a particular case is aberrant and not representative of a systemic problem, they should be cautious in doing so. Again, it is the accused's right and the Crown's obligation to have a trial within a reasonable time, and the Crown is mandated to provide sufficient institutional resources for that to be done. Where the Crown's decisions to charge and prosecute result in a surge in demand on the system, it is the Crown's responsibility to ensure that the system has the resources it needs to provide timely trials. As Justice Cory stated in *Askov*, "the lack of institutional facilities can never be used as a basis for rendering the s. 11(b) guarantee meaningless."[48] It should not be enough for the Crown simply to explain the causes of the institutional delay, as the Crown seeks to do in *Williamson*. Rather, the key question is whether, despite the existence of such delay in a particular case, the Crown has otherwise provided the system with sufficient institutional resources and has taken all reasonable action – including exploring imaginative, interim solutions[49] – to take the case to trial in a timely way. The burden to justify institutional delay always lies on the Crown and, given the threats institutional delay poses to the administration of justice and the public's confidence in it, courts should not easily find the burden to have been met.

PART IV - SUBMISSIONS CONCERNING COSTS

27. The BCCLA does not seek costs and asks that none be ordered against it.

PART V - ORDER SOUGHT

28. The BCCLA requests leave to present oral argument at the hearing of this appeal.

All of which is respectfully submitted this 4th day of August, 2015

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[47] *Ibid*. at p. 800, quoting from *R v. Stensrud*, [1989] 2 S.C.R. 1115 at p. 1116.
[48] *Askov*, *supra* note 9 at p. 1225.
[49] *Ibid*. at pp. 1241-1243.

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