

Form 32



Court File No.: S-254074
Registry: Vancouver

In the Supreme Court of British Columbia

Between:

**Jessie Bains
Applicant**

And:

**Andres Barker
Respondent**

Notice of Application

Name of applicant: Jessie Bains

To: Andres Barker, Respondent

TAKE NOTICE that an application will be made by the applicant to the presiding judge or associate judge at the courthouse at Vancouver, British Columbia, on a date and time to be set by the court for the order(s) set out in **Part 1** below.

July 7th 2025 @ 9:45 am

The applicant estimates that the application will take: **30 minutes**

- ☒ This matter is within the jurisdiction of an associate judge.
☐ This matter is not within the jurisdiction of an associate judge.

Part 1: Order(s) Sought

1. That Jennifer O'Rourke, legal counsel employed by the British Columbia Labour Relations Board, lacks standing to represent the respondent, Andres Barker, in this civil proceeding brought against him in his private capacity.
2. That any and all filings, appearances, or representations made by Ms. O'Rourke or the Labour Relations Board in this matter be declared unauthorized and struck from the record.
3. That the respondent, Andres Barker, be compelled to file a sworn affidavit within 10 days confirming:

- a. That he is appearing in this matter solely in his private capacity; and
 - b. Whether he has retained Ms. O'Rourke or any other legal representative in his private capacity.
 4. That no further participation by the Labour Relations Board or its counsel occur unless explicit written authority and private retainer are filed with the court establishing standing to act on behalf of Mr. Barker in his private capacity.
 5. That public funds not be used to defend a private tort claim brought against Mr. Barker in his individual, non-official capacity, unless lawfully authorized and disclosed.
 6. That costs of this application be awarded to the applicant.
 7. Such further and other relief as this Honourable Court may deem just.
-

Part 2: Factual Basis

- The amended notice of civil claim filed on June 16, 2025, names the respondent, Andres Barker, solely in his private capacity for alleged tortious conduct including misfeasance in public office, negligence, and trespass on the case.
- The Labour Relations Board is not named as a party to this action, and this is not a judicial review or administrative matter within the Board's jurisdiction.
- Jennifer O'Rourke, legal counsel for the Board, has asserted that she represents both the Labour Relations Board and Mr. Barker, without:
 - a. Providing confirmation that she has been privately retained by Mr. Barker;
 - b. Providing a sworn statement from Mr. Barker authorizing her to appear in his individual capacity;
 - c. Providing any lawful justification for the Board's involvement in a private tort action.
- This unexplained participation gives rise to a serious jurisdictional defect, risks abuse of process, and prejudices the applicant by enabling institutional counsel to shield an individual from liability for alleged personal misconduct.
- Emails exchanged between the applicant and Ms. O'Rourke between June 12–17, 2025, show repeated efforts to clarify her authority, all of which were evaded or refused.

- It is improper and unlawful for public resources to be used to defend an individual against civil liability for actions alleged to have occurred outside the lawful scope of public office, unless statutory authority or lawful private retainer is provided.
- Rule 8-5 permits bringing this application without notice due to urgency and risk of prejudice.

Part 3: Legal Basis

This application is brought pursuant to Rule 8-5 of the Supreme Court Civil Rules, which permits applications to proceed without notice where urgency, prejudice, or procedural fairness demands immediate judicial consideration.

The applicant relies on the inherent jurisdiction of this Honourable Court to control its own process, prevent abuse of process, and ensure only those with lawful authority and standing may act in a legal proceeding. The court has discretion to strike unauthorized appearances or filings, particularly where no lawful retainer, express authority, or jurisdictional basis has been disclosed.

This application further invokes the common law doctrine that no person may act as legal counsel in a proceeding without being properly retained by a party, and that public resources may not be used to defend a private tort claim absent clear statutory authority.

The use of institutional legal counsel to shield an individual from private liability—without written retainer, sworn confirmation, or institutional standing—constitutes an abuse of public office and a circumvention of legal accountability.

The respondent, Andres Barker, has been named solely in his private capacity, and no statutory body is a party to the proceeding. Therefore, no public institution or officer may assert participation without specific leave or lawful basis.

Part 4: Material to be relied on

1. The affidavit of Jessie Bains, sworn on or about June 19, 2025
 2. Exhibit A: Amended notice of civil claim, filed June 16, 2025
 3. Exhibit B: Email correspondence between the applicant and Ms. O'Rourke, dated June 12 to June 17, 2025
-

To the persons receiving this Notice of Application:

If you wish to respond to this notice of application, you must, within 5 business days after service of this notice of application, or if this application is brought under Rule 9-7, within 8 business days:

- a) File an application response in Form 33
 - b) File the original of every affidavit and other document you intend to rely on at the hearing that has not already been filed
 - c) Serve on the applicant two copies of each filed document, and one copy on every other party of record
-

Date: June 20, 2025

Signature of applicant:

A handwritten signature in black ink, appearing to be 'JB' followed by a stylized flourish.

Jessie Bains

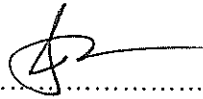
Email: bainsj@gmail.com

Phone: 604-365-3400

- (a) file an application response in Form 33,
- (b) file the original of every affidavit, and of every other document, that
 - i. you intend to refer to at the hearing of this application, and
 - ii. has not already been filed in the proceeding, and
- (c) serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:
 - i. a copy of the filed application response;
 - ii. a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on that person;
 - iii. if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7(9).

JUN 20 2025

Date:



Signature of

☒ applicant ☐ lawyer for applicant(s)

.....
[type or print name]

To be completed by the court only:

Order made

- ☐ in the terms requested in paragraphs of Part 1 of this notice of application
- ☐ with the following variations and additional terms:

.....
.....
.....
.....

Date:

Signature of ☐ Judge ☐ Associate Judge

Form 109



Court File No.: S-254074
Registry: Vancouver

In the Supreme Court of British Columbia

Between:

**Jessie Bains
Applicant**

And:

**Andres Barker
Respondent**

Affidavit of Jessie Bains

I, Jessie Bains, of Surrey, British Columbia, MAKE OATH AND SAY:

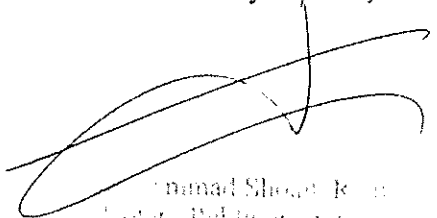
1. I am the Applicant in this proceeding and have personal knowledge of the matters herein, except where stated to be based on information and belief, and where so stated, I believe them to be true.
2. This affidavit is made in support of my **Notice of Application** to strike the unauthorized participation of Jennifer O'Rourke, legal counsel for the BC Labour Relations Board, in the above-captioned civil matter.
3. I commenced this action against **Andres Barker in his private capacity** for alleged tortious conduct including misfeasance in public office, negligence, and trespass on the case, unrelated to his role or duties at the Labour Relations Board.
4. On June 16, 2025, I filed an **Amended Notice of Civil Claim**, which expressly names Mr. Barker only in his **private capacity**, and does not name the Labour Relations Board or any other public body. A true copy of the amended pleading is attached hereto as **Exhibit A**.
5. Following service of my Amended Claim, **Jennifer O'Rourke**—who is employed as Legal Counsel for the Labour Relations Board—asserted that she continues to represent both the Board and Mr. Barker, without ever clarifying whether she had been retained to act on his behalf in a **private capacity**.
6. From June 12 to June 17, 2025, I exchanged numerous emails with Ms. O'Rourke in which I repeatedly requested confirmation of her authority to appear on behalf of Mr. Barker as an individual. Despite multiple opportunities, she failed and refused to provide

a direct answer, instead relying on vague assertions that she represents “both the Board and Mr. Barker.”

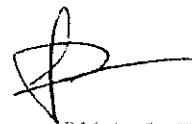
7. A true copy of these emails is attached to this affidavit and marked as **Exhibit B**.
8. At no point has Ms. O’Rourke provided:
 - a. A sworn affidavit from Mr. Barker confirming she is his private and personal legal representative;
 - b. Any written retainer, authorization, or legal basis permitting her to appear in this private tort action; or
 - c. Any explanation justifying the use of public resources by the Labour Relations Board to defend an individual named in a **private and personal capacity**.
9. Her ongoing refusal to clarify her legal capacity and the Labour Relations Board’s insistence on participating in this **private and personal action** raise serious questions of **standing, jurisdiction, and misuse of public resources**.
10. I believe this Court must resolve the threshold issue of Ms. O’Rourke’s standing before any other motions or hearings proceed in this matter. To allow her continued participation without proof of lawful authority would cause procedural unfairness and constitute an abuse of the Court’s process.
11. I make this affidavit in support of my **Notice of Application** under Rule 8-5 of the **Supreme Court Civil Rules**, and for no improper purpose.

SWORN BEFORE ME

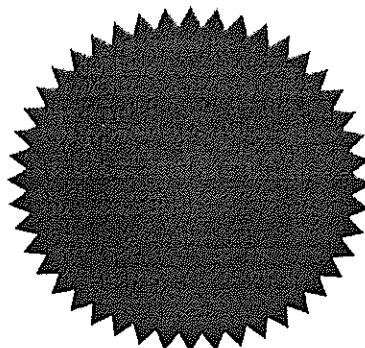
at Surrey, British Columbia
on this 19th day of June, 2025.



Ahmad Shoukri
Notary Public in and for
the Province of British Columbia
111-11701 152 Avenue
Surrey, British Columbia
V4W 1P1, Canada
Tel: 604-594-1161



Jessie Bains



Amended pursuant to Rule 6-1(A) of Rules of Court
original notice of claim filed 05/29/2025

Court File No.: S-254074
Registry: Vancouver

CELESTINE
VANDERKAM
JUN 16 2025

FORCE FILED

In the Supreme Court of British Columbia

Between:

Jessie Bains
Applicant

This is Exhibit "A" referred to in the affidavit of

JESSIE BAINS

Sworn before me at Surrey, British Columbia, this

18 day of JUNE, 2025

And:

Andres Barker
Respondent


A Notary Public in and for the
Province of British Columbia

Muhammad Shariq Rana
Notary Public in and for
the Province of British Columbia
220 - 15711 72 Avenue
Surrey, British Columbia
V3W 2P2, Canada
Tel: 604 596 1861

Form 3 – Amended Notice of Civil Claim

I, Jessie Bains, file this Amended Notice of Civil Claim against the natural person known as Andres Barker, in his private and personal capacity only. This action arises from alleged personal misconduct committed by Andres Barker under colour of public authority, but entirely outside lawful jurisdiction. The Labour Relations Board and the statutory office of Vice-Chair are not parties to this proceeding, nor are they the subject of any relief sought.

This is not a judicial review, reconsideration, or appeal of any administrative decision. It is a tort action against a natural person, based on private liability.

Part 1: Statement of Material Facts

At all material times, Andres Barker was employed as a Vice-Chair of the British Columbia Labour Relations Board. However, the actions that give rise to this claim were committed outside any legal authority granted to that office and constitute private wrongdoing for which Andres Barker is personally liable.

I, Jessie Bains, submitted multiple applications under section 12 of the Labour Relations Code. Despite having presided over earlier related matters and possessing a documented appearance of bias, Andres Barker was assigned to adjudicate those subsequent applications.

I, Jessie Bains, submitted numerous formal and written requests for Andres Barker to recuse himself due to that bias. He refused to do so and did not provide written reasons until after issuing decisions in the applications.

I, Jessie Bains, also requested that Andres Barker confirm or place on record his Oath of Office, to verify his lawful authority and impartial standing. Andres Barker refused.

By refusing to confirm or produce his Oath of Office, and by continuing to act despite formal objections, Andres Barker placed himself outside the jurisdictional protections normally available to public officials. He acted without lawful authority, and thus bears personal liability in tort.

I, Jessie Bains, state that the actions of Andres Barker were deliberate, unauthorized, and taken under colour of office, resulting in prejudice, denial of natural justice, and actionable harm to me.

Part 2: Relief Sought

I, Jessie Bains, seek the following relief:

- General damages, for:
 - Misfeasance in public office;
 - Negligence;
 - Abuse of process;
- Special damages, to be particularized;
- Punitive or exemplary damages, to reflect the intentional, high-handed, and unauthorized nature of Andres Barker's conduct;
- Costs of this action;
- Such further and other relief as this Honourable Court deems just and appropriate.

Part 3: Legal Basis

I, Jessie Bains, rely on the tort of misfeasance in public office, which applies where an individual, acting under colour of public authority, knowingly engages in unlawful conduct that foreseeably causes harm. This tort supports personal liability when actions are taken outside lawful jurisdiction or for improper purposes.

Andres Barker's refusal to recuse himself, his denial of procedural fairness, and his refusal to confirm lawful authority constitute a knowing and deliberate breach of public duty.

Although he purported to act in an official capacity, his conduct was unauthorized, jurisdictionally invalid, and personally motivated, thus removing any entitlement to immunity.

This Honourable Court retains inherent jurisdiction to adjudicate tort claims against individuals, including those arising from abuse of authority committed under colour of public office.

Dated: June 16, 2025

Place: Vancouver, British Columbia



Jessie Bains

Email: bainsj@gmail.com

Phone: 604-365-3400

Filed at:

Supreme Court of British Columbia
Vancouver Registry
800 Smithe Street
Vancouver, BC V6Z 2E1

Court File No.: S-254074
Registry: Vancouver



In the Supreme Court of British Columbia

Between:

Jessie Bains
Applicant

And:

Andres Barker
Respondent

Form 109 – Amended Affidavit #2 of Jessie Bains

I, Jessie Bains, of Surrey, British Columbia, SWEAR (or AFFIRM) THAT:

1. Introduction

I am the Applicant in this proceeding and the author of the accompanying Amended Notice of Civil Claim. I make this affidavit in support of my application to:

- a. Confirm that this lawsuit is brought solely against the natural person known as Andres Barker in his private capacity; and
- b. Request that the Court bar Jennifer O'Rourke and the Labour Relations Board (LRB) from participating in this proceeding, as they have no standing in a tort action against a private individual.

2. Personal Tort Nature of the Claim

I have amended my Notice of Civil Claim under Rule 6-1 of the Supreme Court Civil Rules to remove all references to any public office or official capacity and to make clear that the claim is advanced only against Andres Barker as a private individual. A true copy of the Amended Notice of Civil Claim is attached as **Exhibit A** of this affidavit.

This lawsuit arises from private misconduct by Andres Barker, who used the appearance of public authority without lawful jurisdiction or immunity. The basis of the claim is misfeasance in public office, negligence, and abuse of process, committed personally by Andres Barker while purporting to act under colour of his public role, but outside the bounds of lawful authority.

3. Refusal to Provide Oath of Office

I repeatedly requested that Andres Barker provide or confirm his Oath of Office as required of public decision-makers to establish lawful jurisdiction.

He refused to produce or affirm any such Oath, even after formal written demand.

As a long-time election officer for federal and provincial governments, I have always been required to take and carry an Oath of Office to confirm legal authority. I expected the same standard from Mr. Barker.

His refusal undermines the presumption of lawful jurisdiction and further supports that he acted without lawful status, outside the protective scope of public office, and as a private man.

4. No Standing for the Labour Relations Board or Jennifer O'Rourke

The LRB is not a party to this civil proceeding. This is not a judicial review, statutory appeal, or administrative hearing. It is a private civil action for torts committed by an individual.

Jennifer O'Rourke has failed to confirm that she is retained by Andres Barker in his personal capacity. She appears to act instead on behalf of the institution, which has no legal interest or standing in this claim.

Any involvement by the LRB or its counsel in defending a private tort action against a man acting outside jurisdiction constitutes institutional interference and is improper.

5. Prior Notice of Personal Liability and Jurisdictional Challenge

Prior to filing this claim, I served multiple written objections and formal notices directly on Andres Barker, placing him on notice that he would be held personally liable for continuing to act without recusal or jurisdiction. These included:

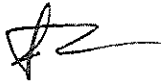
- April 11, 2025: Notice of Objection to Jurisdiction and Request for Oath of Office
- May 1, 2025: Supplemental Notice of Trespass and Fee Schedule
- May 7, 2025: Second Notice of Liability
- May 20, 2025: Third and Final Notice of Liability

True copies of these notices are attached as **Exhibit B** to this affidavit.

6. Conclusion

This proceeding is lawfully and properly brought against Andres Barker as a private individual for conduct undertaken outside lawful authority. The Labour Relations Board and its counsel have no standing in a private tort action of this nature and should be removed from all further participation.

Sworn (or Affirmed) before me at Surrey, British Columbia on this 16th day of June, 2025.



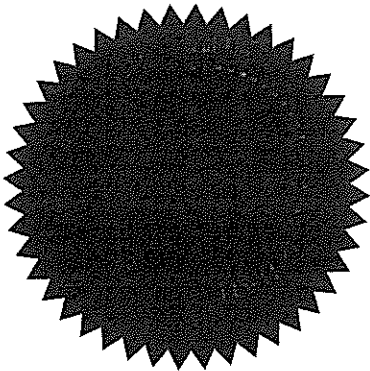
Jessie Bains

Commissioner for Oaths

Sworn before me at Surrey, British Columbia,
16 day of JUNE, 2025

A Notary Public in and for the
Province of British Columbia

Muhammad Sheariff Rami
Notary Public in and for
the Province of British Columbia
220 - 13711 72 Avenue
Surrey, British Columbia
V3W 2P2, Canada
Tel: 604 596 1861



This is Exhibit "B" referred to in the affidavit of

JESSIE BAINS

Sworn before me at Surrey, British Columbia, this

16 day of JUNE, 2025

A Notary Public in and for the
Province of British Columbia

Shoaib Rauf
Notary Public in and for
the Province of British Columbia
11-1172 Avenue
Surrey, British Columbia
V4W 2P2, Canada
Tel: 604 596 1861

BY EMAIL

April 11, 2025

BC LABOUR RELATIONS BOARD

Suite 600 – Oceanic Plaza
1066 West Hastings Street
Vancouver, BC V6E 3X1

To: Andres Barker, Vice-Chair

Cc: Registrar, LRB; Jennifer Glougie, Chair; All Parties on Record

Re: Jessie Bains -and- Hospital Employees' Union – Provincial Health Services Authority
Applications pursuant to Sections 10 and 12 of the Labour Relations Code
(Case Nos. 2024-001334, 1437, 1478, 1491, 1576 and 2025-000395E)

**Subject: Objection to Jurisdiction — Demand for Oath of Office and Immediate
Justification for Refusal to Recuse**

Dear Mr. Barker,

This correspondence serves as a direct response to your letter dated April 11, 2025, in which you declined to recuse yourself and further indicated that no explanation for this decision would be provided until the issuance of a final determination.

Your refusal to provide immediate reasons for your decision not to recuse yourself is not only procedurally improper—it is a clear indication of your intent to unlawfully trespass upon this matter in breach of fundamental principles of natural justice and procedural fairness.

I hereby demand the following:

1. Your sworn oath of office to confirm the lawful basis for your involvement in this matter.
2. An immediate and detailed explanation for your refusal to recuse yourself, prior to the continuation of any further proceedings.

Until these demands are satisfied, no proceedings may lawfully continue, as any further action taken in this case while the issue of jurisdiction and impartiality remains unresolved would be null and void.

Your actions raise serious concerns regarding bias, abuse of authority, and contempt for the rights of the parties involved.

You are now formally put on notice: proceed without resolving this fundamental jurisdictional defect, and you do so under personal and professional liability.

Govern yourself accordingly.

Dated this 11th day of April, 2025

Respectfully submitted,
Jessie Bains
bainsj@gmail.com



Jessie Bains <bainsj@gmail.com>

SUPPLEMENTAL NOTICE OF TRESPASS AND FEE SCHEDULE

1 message

Jessie Bains <bainsj@gmail.com>

Thu, May 1, 2025 at 8:20 PM

To: "LRB Registry Mailbox LRB:EX" <registrar@lrb.bc.ca>

Cc: Jennifer.Glougie@lrb.bc.ca, andres.barker@lrb.bc.ca

SUPPLEMENTAL NOTICE OF TRESPASS AND FEE SCHEDULE**Re: Section 12(1) Applications – Case Nos.**

2024-001334, 2024-001437, 2024-001478, 2024-001491, 2024-001576, 2025-000359, and 2025-000464

To:Vice-Chair Andres Barker
British Columbia Labour Relations Board**Cc:**Jennifer Glougie, Chair
Registrar, Labour Relations Board
All Parties on Record**From:**Jessie Bains
Email: bainsj@gmail.com

TAKE NOTICE that you, Andres Barker, are hereby held personally and professionally liable for continuing to act in these matters after being duly served with a formal Notice of Recusal on May 1, 2025.

Your actions constitute a willful and unauthorized trespass on the case, in violation of natural justice and the legal principle of impartiality. The applicant has not consented to your jurisdiction, and your continued involvement constitutes unlawful authority.

FEE SCHEDULE – IN EFFECT AS OF FIRST ACT OF TRESPASS:

- \$1,000.00 flat fee per unauthorized ruling or procedural act
- \$1.00 per minute for continued unauthorized jurisdiction, until a duly empowered magistrate rules on the jurisdictional challenge
- \$100.00 per Section 12 application filed with the LRB (7 applications = \$700 total)
- \$200.00 per appeal application required as a result of your failure to recuse
- All related court filing, administration, and enforcement costs

The applicant has made every effort to resolve this matter honorably and in good faith. Your failure to recuse and continued trespass will result in lawful enforcement actions, including the convening of a court of record to adjudicate your authority, conduct, and liability under oath.

All rights reserved. No contract or authority is presumed by silence.

This notice stands as formal declaration of dispute, trespass, and fee enforcement.

Dated this 1st day of May, 2025.

Respectfully submitted,
Jessie Bains

BY EMAIL
May 7, 2025

BC LABOUR RELATIONS BOARD
Suite 600 – Oceanic Plaza
1066 West Hastings Street
Vancouver, BC V6E 3X1

To: **Andres Barker, Vice-Chair**
Cc: Registrar, LRB; Jennifer Glougie, Chair; All Parties on Record

Re: Jessie Bains -and- Hospital Employees' Union – Provincial Health Services Authority
Applications pursuant to Sections 10 and 12 of the Labour Relations Code
(Case Nos. 2024-001334, 2024-001437, 2024-001478, 2024-001491, 2024-001576, 2025-000359 and 2025-000464)

Subject: Second Notice of Liability — Ongoing Breach of Duty, Procedural Impropriety, and Unauthorized Jurisdiction

Dear Mr. Barker,

This correspondence constitutes a **Second Notice of Liability** and supplements prior notices dated **April 11, 2025** and **May 1, 2025**, which remain unanswered and unresolved.

Your failure to provide immediate justification for your refusal to recuse yourself, as demanded in my April 11, 2025 letter, and your continued participation in the above-captioned matters constitute a direct violation of the principles of natural justice, procedural fairness, and administrative due process.

Incorporated for the Record:

BY EMAIL – April 11, 2025

To: BC Labour Relations Board
Subject: Objection to Jurisdiction — Demand for Oath of Office and Immediate Justification for Refusal to Recuse

Your refusal to provide reasons until a final determination is issued is procedurally improper and signals an unlawful intent to trespass on these matters. I demanded your sworn Oath of Office and an immediate explanation. You have failed to comply. Any further proceedings are null and void until this is remedied.

SUPPLEMENTAL NOTICE OF TRESPASS AND FEE SCHEDULE – May 1, 2025

To: Vice-Chair Andres Barker

You were further served with notice that your continued involvement, absent consent and lawful jurisdiction, constitutes trespass and incurs personal and professional liability under a defined fee schedule. You have taken no steps to cure the jurisdictional defect nor rebut the challenge.

Status:

You have not made remedy. You continue to act without consent, authority, or jurisdiction, and have refused to confirm your Oath of Office, provide lawful justification for your refusal to recuse, or address the serious issues raised.

Your conduct constitutes:

- Willful breach of natural justice;
- Unauthorized exercise of adjudicative authority;
- Disregard for procedural fairness obligations under the Labour Relations Code;
- Personal and professional trespass on protected rights and legal processes.

DEMAND FOR IMMEDIATE ACTION:

You are hereby directed to:

- Cease and desist all further involvement in these matters;
- Provide a written response to this Notice, confirming:
 - Your Oath of Office;
 - Your legal authority to continue;
 - Your justification for refusing recusal, as originally demanded;
 - Acknowledge liability for all acts taken since service of the first Notice;
 - Confirm cessation of unauthorized jurisdiction within **7 calendar days** of the date of this notice.

Failure to respond or correct the record will result in further lawful actions, including court intervention, constitutional review, and public accountability measures.

All rights reserved. No contract or jurisdiction is conferred by silence.

Respectfully submitted,

Jessie Bains

bainsj@gmail.com

BY EMAIL

May 20, 2025

BC LABOUR RELATIONS BOARD

Suite 600 – Oceanic Plaza
1066 West Hastings Street
Vancouver, BC V6E 3X1

Attention: Vice-Chair Andres Barker

Cc: Registrar, LRB; Chair Jennifer Glougie; All Parties on Record

Re: *Jessie Bains v. Hospital Employees' Union and Provincial Health Services Authority*

Applications under Sections 10 and 12 of the Labour Relations Code

(Case Nos. 2024-001334, 2024-001437, 2024-001478, 2024-001491, 2024-001576, 2025-000395E, 2025-000464)

Subject: Third and Final Notice of Liability — Demand for Immediate Removal

Dear Vice-Chair Barker,

This correspondence serves as the **Third and Final Notice of Liability** regarding your continued participation in the above-referenced matters, despite prior formal notices served on April 11, May 1, and May 7, 2025. Each of those communications requested your immediate recusal, production of your Oath of Office, and a valid legal basis for your assumption of jurisdiction.

To date, you have failed to:

- Disclose your Oath of Office as required;
- Respond to jurisdictional and procedural challenges served upon you; and
- Provide lawful justification for your continued adjudication.

Your ongoing silence and inaction constitute a willful disregard of the rule of law, procedural fairness, and the foundational principles of natural justice. This continued conduct is hereby deemed an unlawful exercise of adjudicative authority and a material breach of your statutory and fiduciary obligations under the *Labour Relations Code* and relevant administrative law standards.

DEMAND FOR IMMEDIATE REMOVAL

Accordingly, you are hereby formally demanded to cease all further involvement and to ensure your removal from these proceedings immediately. Your failure to do so will be construed as:

- Unauthorized and *ultra vires* conduct;
- Procedural and constitutional violations;
- Willful breach of public trust and duty;
- Professional and personal trespass on due process; and
- Contempt for administrative integrity and justice.

Should no confirmation of your removal be received within **seven (7) calendar days** of this notice, you will be held personally and professionally liable for any and all resulting consequences, including but not limited to decisions rendered, costs incurred, and legal remedies pursued. The validity of these proceedings will be formally challenged as *void ab initio*, and the matter escalated to appropriate constitutional and judicial bodies without further notice.

This represents your **final opportunity** to rectify this ongoing breach and to demonstrate respect for the lawful limits of your role.

Dated this 20th day of May, 2025.

Respectfully submitted,
Jessie Bains
bainsj@gmail.com



Jessie Bains <bainsj@gmail.com>

Clarification of Legal Representation – Bains v. Barker, S-254074

1 message

Jessie Bains <bainsj@gmail.com>

Thu, Jun 12, 2025 at 5:10 PM

To: "LRB Registry Mailbox LRB:EX" <registrar@lrb.bc.ca>, Jennifer.Orourke@lrb.bc.ca

Cc: "Glougie, Jennifer A LRB:EX" <Jennifer.Glougie@lrb.bc.ca>, Kirby Smith <KSmith@koskieglavin.com>, "Barker, Andres LRB:EX" <andres.barker@lrb.bc.ca>, barney.strandberg@lrb.bc.ca, "Dimitrov, Ivo [PHSA]" <ivo.dimitrov@phsa.ca>

Dear Ms. O'Rourke,

Your June 12, 2025 response once again fails to directly answer a simple but essential question: In what legal capacity are you representing Mr. Andres Barker?

My Notice of Civil Claim names Mr. Barker in his **personal capacity as an individual who acts as Vice-Chair** of the Labour Relations Board. This is not a judicial review or a matter of reconsideration before the Board—it is a **civil tort action** before the Supreme Court of British Columbia, alleging **misfeasance in public office, negligence, and trespass on the case**. These are allegations of personal misconduct that engage individual liability and fall entirely outside the jurisdiction of the Labour Relations Board and its legal counsel.

It is therefore essential that you state clearly and unambiguously whether you are representing:

1. The Labour Relations Board only;
2. Mr. Barker in his official capacity only;
3. Mr. Barker in his personal capacity as a named defendant in a civil tort action; or
4. Both the Board and Mr. Barker in dual capacities.

Your repeated assertion that you "represent both the Labour Relations Board and Mr. Barker in this matter" is vague, insufficient, and appears to be a deliberate attempt to blur these legal distinctions. If you cannot confirm that you are retained by Mr. Barker personally and authorized to act in his private capacity, then you lack standing to participate in this civil proceeding.

This Court is a court of record and of inherent jurisdiction. It cannot permit institutional counsel to appear on behalf of an individual defendant in a personal tort action without proper and explicit authority. Any continued involvement by you in this action, without confirmed authority from Mr. Barker in his personal capacity, will be treated as an abuse of process and a trespass on the jurisdiction of the Court.

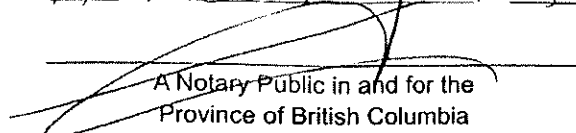
Unless you clarify your role in precise legal terms within 48 hours, I will proceed to file an application challenging your standing. The Court cannot entertain any application or motion from a party or representative who has not lawfully established their right to participate.

I further note that I am unavailable for any proceedings until the second week of July. The sudden urgency to schedule a hearing—after weeks of silence from both Mr. Barker and the Board—is unjustified and undermines both due process and the gravity of the allegations. If Mr. Barker has not retained personal counsel to respond to a civil tort claim, that is his prerogative. However, it is not your place, as Board counsel, to shield him from personal accountability in a private legal action.

Sincerely,
Jessie Bains
 bainsj@gmail.com

This is Exhibit "B" referred to in the affidavit of

JESSIE BAINS
 Sworn before me at Surrey, British Columbia, this
19 day of JUNE, 2025


 A Notary Public in and for the
 Province of British Columbia

MEHMOOD S. ALI, PRC
 Notary Public for
 the Province of British Columbia
 200-11111 Avenue
 Surrey, BC V3W 2P1 Canada
 TEL 604 596 1861



Jessie Bains <bainsj@gmail.com>

Clarification of Legal Representation – Bains v. Barker, S-254074

1 message

Jessie Bains <bainsj@gmail.com>

Thu, Jun 12, 2025 at 5:10 PM

To: "LRB Registry Mailbox LRB:EX" <registrar@lrb.bc.ca>, Jennifer.Orourke@lrb.bc.ca

Cc: "Glougie, Jennifer A LRB:EX" <Jennifer.Glougie@lrb.bc.ca>, Kirby Smith <KSmith@koskieglavin.com>, "Barker, Andres LRB:EX" <andres.barker@lrb.bc.ca>, barney.strandberg@lrb.bc.ca, "Dimitrov, Ivo [PHSA]" <ivo.dimitrov@phsa.ca>

Dear Ms. O'Rourke,

Your June 12, 2025 response once again fails to directly answer a simple but essential question: In what legal capacity are you representing Mr. Andres Barker?

My Notice of Civil Claim names Mr. Barker in his **personal capacity as an individual who acts as Vice-Chair** of the Labour Relations Board. This is not a judicial review or a matter of reconsideration before the Board—it is a **civil tort action** before the Supreme Court of British Columbia, alleging **misfeasance in public office, negligence, and trespass on the case**. These are allegations of personal misconduct that engage individual liability and fall entirely outside the jurisdiction of the Labour Relations Board and its legal counsel.

It is therefore essential that you state clearly and unambiguously whether you are representing:

1. The Labour Relations Board only;
2. Mr. Barker in his official capacity only;
3. Mr. Barker in his personal capacity as a named defendant in a civil tort action; or
4. Both the Board and Mr. Barker in dual capacities.

Your repeated assertion that you “represent both the Labour Relations Board and Mr. Barker in this matter” is vague, insufficient, and appears to be a deliberate attempt to blur these legal distinctions. If you cannot confirm that you are retained by Mr. Barker personally and authorized to act in his private capacity, then you lack standing to participate in this civil proceeding.

This Court is a court of record and of inherent jurisdiction. It cannot permit institutional counsel to appear on behalf of an individual defendant in a personal tort action without proper and explicit authority. Any continued involvement by you in this action, without confirmed authority from Mr. Barker in his personal capacity, will be treated as an abuse of process and a trespass on the jurisdiction of the Court.

Unless you clarify your role in precise legal terms within 48 hours, I will proceed to file an application challenging your standing. The Court cannot entertain any application or motion from a party or representative who has not lawfully established their right to participate.

I further note that I am unavailable for any proceedings until the second week of July. The sudden urgency to schedule a hearing—after weeks of silence from both Mr. Barker and the Board—is unjustified and undermines both due process and the gravity of the allegations. If Mr. Barker has not retained personal counsel to respond to a civil tort claim, that is his prerogative. However, it is not your place, as Board counsel, to shield him from personal accountability in a private legal action.

Sincerely,
Jessie Bains
bainsj@gmail.com



Jessie Bains <bainsj@gmail.com>

RE: Clarification of Legal Representation – Bains v. Barker, S-254074

1 message

O'Rourke, Jennifer M LRB:EX <Jennifer.Orourke@lrbc.ca>

Fri, Jun 13, 2025 at 10:04 AM

To: Jessie Bains <bainsj@gmail.com>

Cc: "Strandberg Barney D LRB:EX" <barney.strandberg@lrbc.ca>

Dear Mr. Bains,

Thank you for providing your availability. I am not available during the second week of July. However, I am available the week of July 21. Accordingly, I will be setting the application down for a hearing in chambers on Thursday July 24, 2025. My assistant will send you a filed copy of the application in due course.

Any issues you may have with respect to the Board's standing can be dealt with by the Court. I will not object to you raising those issues at the hearing of the application to strike. If you nonetheless wish to file your own application, I will also not object to having it heard at the same time as the application to strike.

Thank you,

Jennifer O'Rourke

Jennifer O'Rourke (she/her)

Legal Counsel, BC Labour Relations Board



The Labour Relations Board acknowledges the traditional territories of the many diverse Indigenous Peoples in the geographic area we serve. With gratitude and respect, we acknowledge that the Board's office is located on the traditional unceded territories of the Coast Salish peoples, including the territories of the x̱məθkʷəy̱əm (Musqueam), Skwxwú7mesh (Squamish), and səliłwətaʔ (Tsleil-Waututh) Nations

This e-mail and any attachments may contain confidential or privileged information and is intended only for the use of the person(s) to whom it is addressed. If you received this email in error, please immediately delete it and any attachments and notify me by telephone or by email. Thank you.

From: Jessie Bains <bainsj@gmail.com>

Sent: June 12, 2025 5:10 PM

To: LRB Registry Mailbox LRB:EX <registrar@lrb.bc.ca>; O'Rourke, Jennifer M LRB:EX <Jennifer.Orourke@lrb.bc.ca>

Cc: Glougie, Jennifer A LRB:EX <Jennifer.Glougie@lrb.bc.ca>; Kirby Smith <KSmith@koskieglavin.com>; Barker, Andres LRB:EX <Andres.Barker@lrb.bc.ca>; Strandberg Barney D LRB:EX <barney.strandberg@lrb.bc.ca>; Dimitrov, Ivo [PHSA] <ivo.dimitrov@phsa.ca>

Subject: Clarification of Legal Representation – Bains v. Barker, S-254074

This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Dear Ms. O'Rourke,

Your June 12, 2025 response once again fails to directly answer a simple but essential question: In what legal capacity are you representing Mr. Andres Barker?

My Notice of Civil Claim names Mr. Barker in his **personal capacity as an individual who acts as Vice-Chair** of the Labour Relations Board. This is not a judicial review or a matter of reconsideration before the Board—it is a **civil tort action** before the Supreme Court of British Columbia, alleging **misfeasance in public office, negligence, and trespass on the case**. These are allegations of personal misconduct that engage individual liability and fall entirely outside the jurisdiction of the Labour Relations Board and its legal counsel.

It is therefore essential that you state clearly and unambiguously whether you are representing:

1. The Labour Relations Board only;
2. Mr. Barker in his official capacity only;
3. Mr. Barker in his personal capacity as a named defendant in a civil tort action; or
4. Both the Board and Mr. Barker in dual capacities.

Your repeated assertion that you “represent both the Labour Relations Board and Mr. Barker in this matter” is vague, insufficient, and appears to be a deliberate attempt to blur these legal distinctions. If you cannot confirm that you are retained by Mr. Barker personally and authorized to act in his private capacity, then you lack standing to participate in this civil proceeding.

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Unless you clarify your role in precise legal terms within 48 hours, I will proceed to file an application challenging your standing. The Court cannot entertain any application or motion from a party or representative who has not lawfully established their right to participate.

I further note that I am unavailable for any proceedings until the second week of July. The sudden urgency to schedule a hearing—after weeks of silence from both Mr. Barker and the Board—is unjustified and undermines both due process and the gravity of the allegations. If Mr. Barker has not retained personal counsel to respond to a civil tort claim, that is his prerogative. However, it is not your place, as Board counsel, to shield him from personal accountability in a private legal action.

Sincerely,
Jessie Bains
bainsj@gmail.com



Jessie Bains <bainsj@gmail.com>

Objection to Combined Hearing – Bains v. Barker, S-2540741 message

Jessie Bains <bainsj@gmail.com>

Fri, Jun 13, 2025 at 12:39 PM

To: Jennifer.Orourke@lrb.bc.ca, "LRB Registry Mailbox LRB:EX" <registrar@lrb.bc.ca>

Cc: "Glougie, Jennifer A LRB:EX" <Jennifer.Glougie@lrb.bc.ca>, Kirby Smith <KSmith@koskieglavin.com>, "Barker, Andres LRB:EX" <andres.barker@lrb.bc.ca>, barney.strandberg@lrb.bc.ca, "Dimitrov, Ivo [PHSA]" <ivo.dimitrov@phsa.ca>

Dear Ms. O'Rourke,

Thank you for your message dated June 13, 2025.

I must respectfully object to your attempt to have your application to strike my Notice of Civil Claim heard concurrently with my forthcoming application regarding your standing in this matter. These are distinct and procedurally independent issues, and your ongoing refusal to confirm in clear legal terms whom you represent makes it impossible for me to prepare an adequate defence to your application at this time.

As you are aware, my civil suit is against Mr. Andres Barker in his personal capacity for alleged torts entirely outside the jurisdiction of the Labour Relations Board. Your participation as Board counsel—without any formal or explicit retainer authorizing you to act on behalf of Mr. Barker in his personal capacity—is a direct encroachment on the integrity of this civil proceeding. Your persistent ambiguity amounts to an attempted ambush, and borders on an abuse of process.

Accordingly, I insist that my application regarding your standing be heard and decided first. Only once the Court has ruled on whether you have lawful authority to appear in this matter will I consider participating in any hearing of your application to dismiss. If the Court finds that you lack standing—as I strongly believe it will—your application will be rendered moot and rightly struck from the record.

Furthermore, should the Court rule in your favour and allow your continued involvement, I will require **a minimum of one full week's notice** to adequately prepare my response to your motion. Your recent conduct, including delayed communication followed by sudden scheduling without resolution of the threshold issue of standing, is unacceptable. I will not participate in a hearing that has been strategically designed to obscure the real legal issues and bypass foundational principles of procedural fairness.

Let me be clear: this is a private tort action, not a Board matter, and your unsolicited intrusion into these proceedings—without verifying your role—constitutes a trespass on my legal rights as a private litigant and an improper use of public legal resources to shield Mr. Barker from individual accountability.

I reserve all rights, including the right to seek costs against you personally should it be determined that your participation was improper or unauthorized.

I will be setting July 21 for the Court to hear my application—and only my application—since you have confirmed your availability for that date.

Sincerely,

Jessie Bains

bainsj@gmail.com



Jessie Bains <bainsj@gmail.com>

RE: Objection to Combined Hearing – Bains v. Barker, S-254074

1 message

O'Rourke, Jennifer M LRB:EX <Jennifer.Orouke@lrb.bc.ca>

Fri, Jun 13, 2025 at 2:49 PM

To: Jessie Bains <bainsj@gmail.com>

Cc: "Strandberg Barney D LRB:EX" <barney.strandberg@lrb.bc.ca>

Dear Mr. Bains,

As I have advised you on several occasions, I represent both the Labour Relations Board and Mr. Barker. Mr. Barker is named as a party and I have indicated that I am his counsel. I am not required to, nor do I intend to, share any additional information with you as that information is subject to solicitor-client privilege.

I understand that you do not believe the Board has standing in this matter. I agree that this is a matter for the Court to decide. In my view, the applications should be heard at the same time. As you have indicated you are available on July 21, I will set down the application to strike for that date as well. My assistant will provide you with a filed copy when we receive it back from the registry.

Thank you,

Jennifer O'Rourke

Jennifer O'Rourke (she/her)

Legal Counsel, BC Labour Relations Board



The Labour Relations Board acknowledges the traditional territories of the many diverse Indigenous Peoples in the geographic area we serve. With gratitude and respect, we acknowledge that the Board's office is located on the traditional unceded territories of the Coast Salish peoples, including the territories of the xʷməθkʷəy̓əm (Musqueam), Skwxwú7mesh (Squamish), and səliłwətaʔ (Tsleil-Waututh) Nations

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From: Jessie Bains <bainsj@gmail.com>

Sent: June 13, 2025 12:39 PM

To: O'Rourke, Jennifer M LRB:EX <Jennifer.Orourke@lrb.bc.ca>; LRB Registry Mailbox LRB:EX <registrar@lrb.bc.ca>

Cc: Glougie, Jennifer A LRB:EX <Jennifer.Glougie@lrb.bc.ca>; Kirby Smith <KSmith@koskieglavin.com>; Barker, Andres LRB:EX <Andres.Barker@lrb.bc.ca>; Strandberg Barney D LRB:EX <barney.strandberg@lrb.bc.ca>; Dimitrov, Ivo [PHSA] <ivo.dimitrov@phsa.ca>

Subject: Objection to Combined Hearing — Bains v. Barker, S-254074

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Dear Ms. O'Rourke,

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I reserve all rights, including the right to seek costs against you personally should it be determined that your participation was improper or unauthorized.

I will be setting July 21 for the Court to hear my application—and only my application—since you have confirmed your availability for that date.

Sincerely,

Jessie Bains

bainsj@gmail.com



Jessie Bains <bainsj@gmail.com>

RE: Bains v. Barker – Supreme Court File No. S-254074

1 message

O'Rourke, Jennifer M LRB:EX <Jennifer.Orouke@lrb.bc.ca>

Tue, Jun 17, 2025 at 3:27 PM

To: Jessie Bains <bainsj@gmail.com>

Cc: "Strandberg Barney D LRB:EX" <barney.strandberg@lrb.bc.ca>

Dear Mr. Bains,

I write to confirm service of the amended notice of civil claim filed on June 16, 2025.

I confirm that I continue to represent the Labour Relations Board and Andres Barker in this matter. Any correspondence in relation to this matter should be sent to my attention.

Thank you,

Jennifer O'Rourke

Jennifer O'Rourke (she/her)

Legal Counsel, BC Labour Relations Board



The Labour Relations Board acknowledges the traditional territories of the many diverse Indigenous Peoples in the geographic area we serve. With gratitude and respect, we acknowledge that the Board's office is located on the traditional unceded territories of the Coast Salish peoples, including the territories of the xʷməθkʷəy̓əm (Musqueam), Skwxwú7mesh (Squamish), and səliłwətaʔ (Tsleil-Waututh) Nations

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From: Jessie Bains <bainsj@gmail.com>

Sent: June 16, 2025 5:25 PM

To: LRB Registry Mailbox LRB:EX <registrar@lrb.bc.ca>; O'Rourke, Jennifer M LRB:EX <Jennifer.Orouke@lrb.bc.ca>

Cc: Glougie, Jennifer A LRB:EX <Jennifer.Glougie@lrb.bc.ca>; Kirby Smith <KSmith@koskieglavin.com>; Barker, Andres LRB:EX <Andres.Barker@lrb.bc.ca>; Strandberg Barney D LRB:EX <barney.strandberg@lrb.bc.ca>; Dimitrov, Ivo [PHSA] <ivo.dimitrov@phsa.ca>

Subject: Bains v. Barker – Supreme Court File No. S-254074

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Date: June 16, 2025

To: Jennifer O'Rourke
Labour Relations Board
Suite 600 – 1066 West Hastings Street
Vancouver, BC V6E 3X1

Re: *Bains v. Barker – Supreme Court File No. S-254074*

Dear Ms. O'Rourke,

Please find enclosed a copy of the Amended Notice of Civil Claim, filed with the Supreme Court of British Columbia, Vancouver Registry. This amendment affirms that the civil claim is brought solely against the natural person known as Andres Barker, in his private capacity, for alleged tortious conduct committed under colour of public office. The claim does not name the Labour Relations Board, the statutory office of Vice-Chair, or any public body. This is a private tort claim and not a matter of judicial review or administrative law.

To be clear, the amended claim does not allege misconduct by a public officer in an official capacity, but rather personal liability arising from actions undertaken by the man, Barker, acting without valid authority and outside the scope of any lawful jurisdiction.

Accordingly, please confirm whether you represent Mr. Barker in his private capacity. If you do not, you do not have standing to appear in this civil matter and should notify the Court and the undersigned without delay.

Please govern yourself accordingly.

Sincerely,

Jessie Bains

Email: bainsj@gmail.com

Phone: 604-365-3400



Jessie Bains <bainsj@gmail.com>

June 17, 2025 – Misrepresentation of Capacity in Bains v. Barker, Supreme Court File No. S-2540741 message

Jessie Bains <bainsj@gmail.com>

Tue, Jun 17, 2025 at 4:24 PM

To: "O'Rourke, Jennifer M LRB:EX" <Jennifer.Orourke@lrb.bc.ca>, "LRB Registry Mailbox LRB:EX" <registrar@lrb.bc.ca>
Cc: "Strandberg Barney D LRB:EX" <barney.strandberg@lrb.bc.ca>, "Glougie, Jennifer A LRB:EX" <Jennifer.Glougie@lrb.bc.ca>, Kirby Smith <KSmith@koskieglavin.com>, "Barker, Andres LRB:EX" <andres.barker@lrb.bc.ca>, "Dimitrov, Ivo [PHSA]" <ivo.dimitrov@phsa.ca>

To: Jennifer O'Rourke
Legal Counsel, Labour Relations Board
Jennifer.Orourke@lrb.bc.ca

Dear Ms. O'Rourke,

I acknowledge receipt of your June 17, 2025 email, in which you assert that you "continue to represent the Labour Relations Board and Andres Barker in this matter."

With respect, that assertion remains legally untenable and procedurally inappropriate.

As clearly stated in my amended Notice of Civil Claim, this action is brought against **Andres Barker in his personal capacity**, for conduct undertaken **outside the scope of his statutory office**. This is a **private tort claim**, not a judicial review, and no public body—including the Labour Relations Board—has been named as a defendant. Therefore, any appearance by the Board or its legal counsel in this matter is without legal foundation unless properly justified.

You have not answered the critical threshold question: **Has Mr. Barker retained you in your private capacity as legal counsel?** Unless and until that question is answered unequivocally, you lack standing to appear in this matter.

To be absolutely clear:

A government lawyer has no legal authority to represent an individual in a private tort claim unless they are formally retained by that individual in a personal capacity.

If Mr. Barker is relying on publicly funded legal counsel to respond to allegations of personal misconduct unrelated to his public duties, that raises serious legal and ethical concerns which I intend to bring before the Court.

Your continued refusal to clarify your status gives rise to the reasonable inference that you are attempting to deliberately conflate this private tort action with matters falling under the Labour Relations Board's jurisdiction. This is misleading and improper.

Accordingly, I require the following no later than **5:00 PM on June 18, 2025**:

1. Written confirmation as to whether you have been personally retained by Mr. Barker in his private capacity;
2. A sworn affidavit or formal filing from Mr. Barker confirming whether he is appearing in this proceeding as an individual or under colour of public office;
3. A legal explanation outlining the Labour Relations Board's authority, if any, to expend public resources defending an individual named solely in a private capacity in a civil tort claim.

Until these matters are addressed, I maintain that any involvement by the Labour Relations Board or its legal counsel in this proceeding is **improper, without jurisdiction**, and may amount to an **abuse of public resources and interference with a private civil claim**.

Should this ambiguity persist, I will bring an immediate motion seeking:

- To strike any unauthorized appearance by you or the LRB;
- An order compelling full disclosure;

- And a cost award against Mr. Barker and the Board, if appropriate.

You are hereby directed to govern yourself accordingly.

Sincerely,

Jessie Bains

Email: bainsj@gmail.com

Phone: 604-365-340

On Tue, Jun 17, 2025 at 3:27 PM O'Rourke, Jennifer M LRB:EX <Jennifer.Orouke@lrb.bc.ca> wrote:

Dear Mr. Bains,

I write to confirm service of the amended notice of civil claim filed on June 16, 2025.

I confirm that I continue to represent the Labour Relations Board and Andres Barker in this matter. Any correspondence in relation to this matter should be sent to my attention.

Thank you,

Jennifer O'Rourke

Jennifer O'Rourke (she/her)

Legal Counsel, BC Labour Relations Board



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From: Jessie Bains <bainsj@gmail.com>

Sent: June 16, 2025 5:25 PM

To: LRB Registry Mailbox LRB:EX <registrar@lrb.bc.ca>; O'Rourke, Jennifer M LRB:EX <Jennifer.Orouke@lrb.bc.ca>

Cc: Glougie, Jennifer A LRB:EX <Jennifer.Glougie@lrb.bc.ca>; Kirby Smith <KSmith@koskieglavin.com>; Barker, Andres LRB:EX <Andres.Barker@lrb.bc.ca>; Strandberg Barney D LRB:EX <barney.strandberg@lrb.bc.ca>; Dimitrov, Ivo [PHSA] <ivo.dimitrov@phsa.ca>

Subject: Bains v. Barker – Supreme Court File No. S-254074

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Date: June 16, 2025

To: Jennifer O'Rourke
Labour Relations Board
Suite 600 – 1066 West Hastings Street
Vancouver, BC V6E 3X1

Re: *Bains v. Barker – Supreme Court File No. S-254074*

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To be clear, the amended claim does not allege misconduct by a public officer in an official capacity, but rather personal liability arising from actions undertaken by the man, Barker, acting without valid authority and outside the scope of any lawful jurisdiction.

Accordingly, please confirm whether you represent Mr. Barker in his private capacity. If you do not, you do not have standing to appear in this civil matter and should notify the Court and the undersigned without delay.

Please govern yourself accordingly.

Sincerely,

Jessie Bains

Email: bainsj@gmail.com

Phone: 604-365-3400