

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

**SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS**

Plaintiff

and

**THE ATTORNEY GENERAL OF CANADA and HIS MAJESTY THE  
KING IN RIGHT OF ONTARIO**

Defendants

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**REPLY MOTION RECORD OF THE HAUDENOSAUNEE DEVELOPMENT  
INSTITUTE**

*(Motion for Intervention/Joinder)*

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February 6, 2023

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Territory

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

**B E T W E E N:**

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Plaintiff

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**THE ATTORNEY GENERAL OF CANADA and HIS MAJESTY THE  
KING IN RIGHT OF ONTARIO**

Defendants

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**TAB 1**

Court File No. CV-18-594281

**ONTARIO**  
**SUPERIOR COURT OF JUSTICE**

B E T W E E N:

**SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS**

Plaintiff

and

**THE ATTORNEY GENERAL OF CANADA and HIS MAJESTY THE  
KING IN RIGHT OF ONTARIO**

Defendants

**THE HAUDENOSAUNEE DEVELOPMENT INSTITUTE**

Moving Party

**REPLY AFFIDAVIT OF RICHARD SAUL**

*(Affirmed February 6, 2023)*

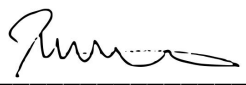
I, RICHARD SAUL, of the Town of Ancaster, in the Province of Ontario, MAKE  
OATH AND SAY:

1. In this affidavit, I comment on the following statements made in the affidavit of Helen Miller at paragraphs 8 and 13 regarding HDI's transparency and finances.
2. I also comment on the statement made at paragraph 11 of the affidavit of Mark Hill concerning HDI's transparency.
3. My reply to the statements above can be found in my affidavit affirmed February 6, 2023 in response to the evidence filed by the Men's Fire of the Six Nations Grand River

Territory (the “Men’s Fire”) in connection to the Men’s Fire’s motion to intervene in this proceeding, which I incorporate here by reference.

4. In that affidavit, I explain HDI’s reporting process, finances, and accountability to the Haudenosaunee Confederacy through its Chiefs and Clan Mothers.

AFFIRMED BEFORE ME at Toronto, in )  
the Province of Ontario, remotely by the )  
affiant stated as being located in the Town )  
of Caledonia in the Province of Ontario, )  
this 6<sup>th</sup> day of February, 2023, in )  
accordance with O. Reg. 431/20, )  
Administering Oath or Declaration )  
Remotely )



\_\_\_\_\_  
Commissioner for Taking Affidavits  
Jonathan Martin (LSO# 83596H)



\_\_\_\_\_  
RICHARD SAUL



SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS  
Plaintiff

-and-

THE ATTORNEY GENERAL OF CANADA *et al.*  
Defendants

Court File No. CV-18-594281

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

PROCEEDING COMMENCED AT  
TORONTO

**REPLY AFFIDAVIT OF RICHARD SAUL**

*(Affirmed February 6, 2023)*

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Lawyers for the Haudenosaunee Development Institute

**TAB 2**

Court File No. CV-18-594281

**ONTARIO**  
**SUPERIOR COURT OF JUSTICE**

B E T W E E N:

**SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS**

Plaintiff

and

**THE ATTORNEY GENERAL OF CANADA and HER MAJESTY THE  
QUEEN IN RIGHT OF ONTARIO**

Defendants

**REPLY AFFIDAVIT OF RICHARD WAYNE HILL SR.**

*(Affirmed February 6, 2023)*

I, RICHARD WAYNE HILL SR., of the Village of Ohsweken, in the Province of Ontario, MAKE OATH AND SAY:

1. I have been asked by counsel for HDI to comment upon the statement at paragraph 5 of the affidavit of Helen Miller affirmed November 1, 2022 concerning the formation of HDI.
2. In reply, I refer to and incorporate by reference paragraphs 66-71 of my affidavit affirmed February 6, 2023 in respect of the motion made by the Men's Fire of the Six Nations Grand River Territory in this proceeding.

3. In those paragraphs, I explain that I was present when the formation of HDI was discussed and that HDI was duly formed under the sovereign authority of the HCCC and pursuant to Haudenosaunee practices, procedures, and law.

AFFIRMED BEFORE ME at Toronto, in )  
the Province of Ontario, remotely by the )  
affiant stated as being located in the Town )  
of Burlington, in the Province of Ontario, )  
this 6th day of February, 2023, in )  
accordance with O. Reg. 431/20, )  
Administering Oath or Declaration )  
Remotely )



\_\_\_\_\_  
Commissioner for Taking Affidavits  
Thomas Dumigan (LSO# 74988P)



\_\_\_\_\_  
RICHARD WAYNE HILL SR.

SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS  
Plaintiff

-and-

THE ATTORNEY GENERAL OF CANADA *et al.*  
Defendants

Court File No. CV-18-594281

**ONTARIO  
SUPERIOR COURT OF JUSTICE**  
  
PROCEEDING COMMENCED AT  
TORONTO

**REPLY AFFIDAVIT OF RICHARD WAYNE HILL SR.**  
*(Affirmed February 6, 2023)*

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SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS  
Plaintiff

-and-

THE ATTORNEY GENERAL OF CANADA *et al.*  
Defendants

Court File No. CV-18-594281

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

PROCEEDING COMMENCED AT  
TORONTO

**RESPONDING MOTION RECORD OF THE  
HAUDENOSAUNEE DEVELOPMENT INSTITUTE**  
*(Motion for Intervention/ Joinder)*

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