

From: Koren Thomson
To: Worsfold, Scott; Jayna Green
Cc: Raske, Matthew
Subject: RE: Correspondence from Dr. J. Morrison
Date: Wednesday, September 3, 2025 11:10:58 AM

Hi Scott,

s. 40 (1)

Further to Jayna's email

s. 30 (1)(a)

s. 30 (1)(a)

Please let us know if you'd like to have a call.

Warm Regards,

Koren

Koren A. Thomson

Partner
Stewart McKelvey
D: 709.570.8848

From: Worsfold, Scott <dsworsfold@mun.ca>
Sent: Wednesday, September 3, 2025 10:15 AM
To: Koren Thomson <kthomson@stewartmckelvey.com>; Jayna Green <jgreen@stewartmckelvey.com>
Cc: Raske, Matthew <mraske@mun.ca>
Subject: FW: Correspondence from Dr. J. Morrison
Importance: High

This is an external email.

Hi Koren and Jayna:

Please see Jingjing's reply to my latest correspondence on this matter.

[REDACTED] s. 30 (1)(a)

Thanks,
Scott



Scott Worsfold, BA, M.Div., LLB
General Counsel
Office of the General Counsel
Arts & Administration Building Rm A-1005
230 Elizabeth Ave.,
PO Box 4200
St. John's, NL
A1C 5S7
T: 709-864-7695
E: dsworsfold@mun.ca

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From: Xu, Jingjing <jingjingx@mun.ca>

Sent: Wednesday, September 3, 2025 10:05 AM

To: Worsfold, Scott <dsworsfold@mun.ca>

Cc: President, The <munpres@mun.ca>; J XU [REDACTED] s. 40 (1)

Subject: Re: Correspondence from Dr. J. Morrison

Importance: High

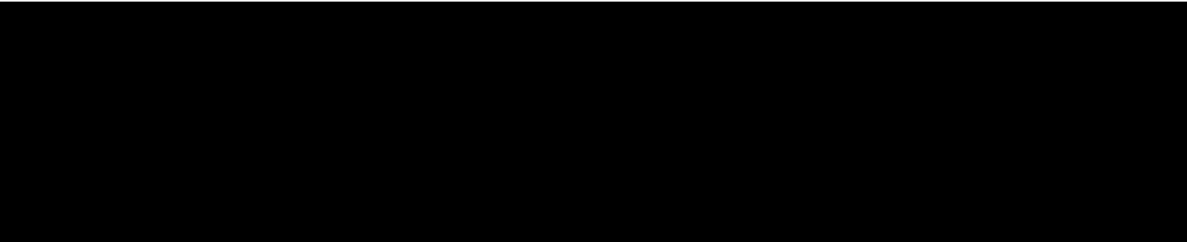
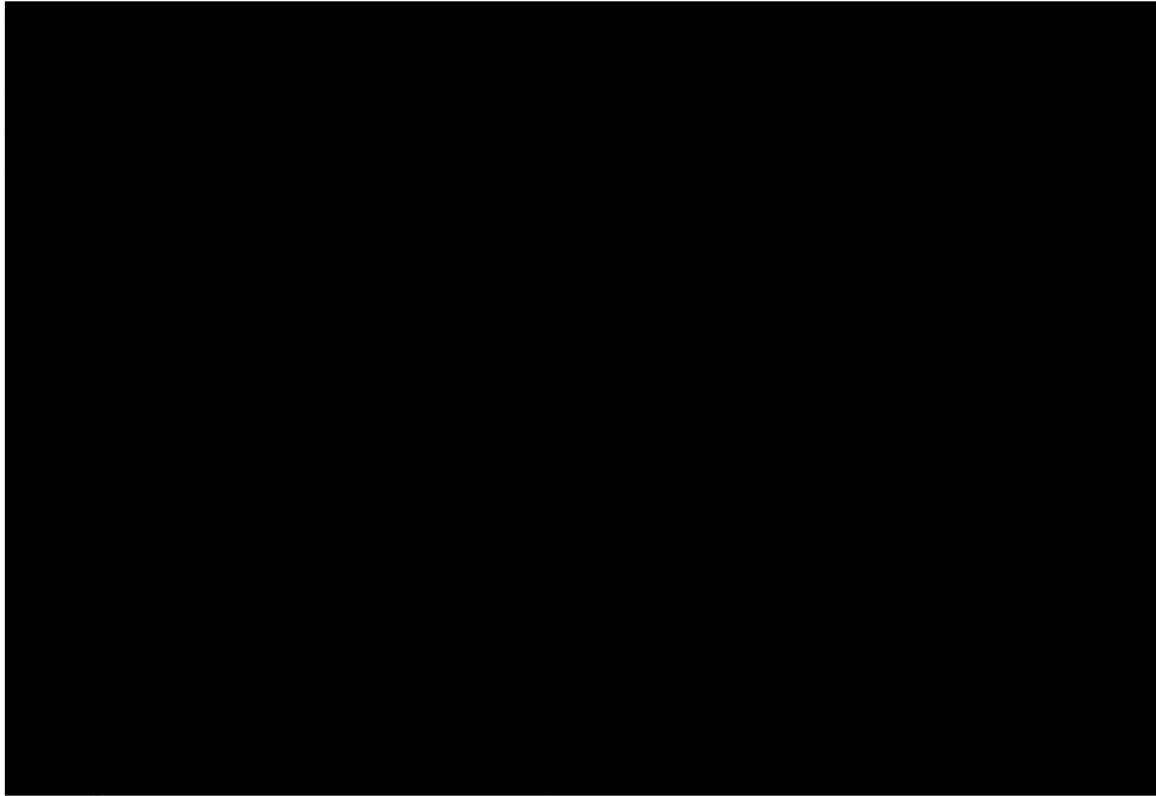
Dear Scott,

Thank you for your email. I appreciate your willingness to meet and remain available.
I must respond in writing to ensure the matter is clearly documented, [REDACTED]

[REDACTED] s. 30 (1)(a)

[REDACTED] s. 30 (1)(a)

[REDACTED] s. 30 (1)(a)


s. 30 (1)(a)
s. 30 (1)(a)
I remain willing to discuss this matter further; however, to ensure a clear and complete record, I request that all communications be conducted in writing via email to both my work and personal addresses. 


s. 40 (1)

Yours sincerely,

Dr. Jingjing Xu

Prof. Jingjing Xu, PhD, FRIN, FHEA, MNI
Associate Vice-President (Harlow Campus and Global Partnerships)
Memorial University of Newfoundland

Address:
Harlow Campus
The Maltings
Harlow, Essex, CM17 0AJ

United Kingdom

From: Worsfold, Scott <dsworsfold@mun.ca>
Date: Tuesday, 2 September 2025 at 18:09
To: Xu, Jingjing <jingjingx@mun.ca>
Cc: President, The <munpres@mun.ca>, J XU [REDACTED] s. 40 (1)
Subject: RE: Correspondence from Dr. J. Morrison

Privileged and Confidential

Hi Jingjing:

Further to our exchange about trying to set up a meeting for tomorrow, [REDACTED] s. 40 (1)
[REDACTED] I hope we can meet tomorrow. In anticipation of our meeting, I
would like to respond to your most recent correspondence to the president.

[REDACTED] s. 30 (1)(a)

[REDACTED] s. 30 (1)(a)

[REDACTED] s. 30 (1)(a)

I would still welcome the opportunity to meet with you and discuss all of this tomorrow, if you are available.

Thanks,
Scott



Scott Worsfold, BA, M.Div., LLB
General Counsel
Office of the General Counsel
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St. John's, NL
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From: Xu, Jingjing <jingjingx@mun.ca>
Sent: Tuesday, September 2, 2025 1:12 PM
To: Worsfold, Scott <dsworsfold@mun.ca>
Cc: President, The <munpres@mun.ca>; J XU [REDACTED] s. 40 (1)
Subject: Re: Correspondence from Dr. J. Morrison

Dear Scott,

Thank you for your email. I had hoped to meet today; however, [REDACTED] s. 40 (1)

[REDACTED]

I will make every effort to be in touch again tomorrow if possible.

Thank you for your understanding.

Best regards,

Jingjing

Prof. Jingjing Xu, PhD, FRIN, FHEA, MNI

Associate Vice-President (Harlow Campus and Global Partnerships)
Memorial University of Newfoundland

Address:

Harlow Campus
The Maltings
Harlow, Essex, CM17 0AJ
United Kingdom

From: Worsfold, Scott <dsworsfold@mun.ca>
Date: Tuesday, 2 September 2025 at 15:06
To: Xu, Jingjing <jingjingx@mun.ca>
Cc: President, The <munpres@mun.ca>
Subject: RE: Correspondence from Dr. J. Morrison
Jingjing:

I am just today back [REDACTED] What time could you do a teams meeting today?

s. 40 (1)

Thanks,
Scott



Scott Worsfold, BA, M.Div., LLB
General Counsel
Office of the General Counsel
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From: Xu, Jingjing <jingjingx@mun.ca>
Sent: Tuesday, August 26, 2025 4:27 PM
To: Worsfold, Scott <dsworsfold@mun.ca>
Cc: President, The <munpres@mun.ca>
Subject: FW: Correspondence from Dr. J. Morrison

NOTE TO APPLICANT: The referenced attachment is found on pages 69 and 70 of the responsive records.

Dear Scott,

IAP Office

I am writing to request an urgent meeting with you regarding the attached letter I received today, 26 August 2025, from Dr. Janet Morrison concerning the proposed disclosure of my employment contract under ATIPPA.

s. 40 (1)

Given the seriousness of the issues involved - including contractual obligations and data protection requirements - I believe it is important that we meet at the earliest opportunity.

Please let me know a suitable time.

Kind regards,

Jingjing

Prof. Jingjing Xu, PhD, FRIN, FHEA, MNI
Associate Vice-President (Harlow Campus and Global Partnerships)
Memorial University of Newfoundland

Address:
Harlow Campus
The Maltings
Harlow, Essex, CM17 0AJ
United Kingdom

From: President, The <munpres@mun.ca>
Date: Tuesday, 26 August 2025 at 18:31
To: Xu, Jingjing <jingjingx@mun.ca>
Subject: Correspondence from Dr. J. Morrison

Good afternoon,

Please see attached correspondence being issued on behalf of Dr. Janet Morrison, President and Vice-Chancellor, Memorial University.

Best regards,
Rose
Rose M. Frew, Executive Assistant to the President (Correspondence)
President's Office, Room A-2028
Arts and Administration Building | 230 Elizabeth Avenue
Memorial University | St. John's | Newfoundland and Labrador | A1C 5S7
t: 709 864 8212 | f: 709 864 2059 | email: president@mun.ca



We acknowledge that the lands on which Memorial University's campuses are situated are in the traditional territories of diverse Indigenous groups, and we acknowledge with respect the diverse histories and cultures of the Beothuk, Mi'kmaq, Innu, and Inuit of this province.

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MEMORIAL
UNIVERSITY
Office of the President
St. John's, NL Canada A1C 5S7
Tel: 709 864 8212 Fax: 709 864 2059
president@mun.ca www.mun.ca

August 26, 2025

Private and Confidential

Dr. Jingjing Xu
Associate Vice-President
Harlow Campus and Global Partnerships

Via Email: jingjingx@mun.ca

Dear Dr. Xu

RE: Notice of Disclosure of Employment Contract with Redactions

I am writing in relation to the disclosure request which Memorial University of Newfoundland ("**Memorial**") received under the *Access to Information and Protection of Privacy Act, 2015*, SNL 2015, c. A-1.2 (the "**ATIPPA**"), in relation to your contract of employment in the position of Associate Vice-President, Harlow Campus and Global Partnerships.

s. 30 (1)(a)

Memorial has decided to comply with the recommendation of the Newfoundland and Labrador Information and Privacy Commissioner (the "**Commissioner**"), set out in paragraph 34 of Report A-2025-015 as follows:

... I recommend that Memorial University disclose the record to the Complainant, subject only to the redaction of the employee's home address (page 2 of the record), prospective home address (page 6 of the record) and the signatures of the parties (page 13 of the record).

Upon careful review, Memorial is satisfied that complying with the Commissioner's recommendation meets our legal obligations under the *ATIPPA* and constitutes lawful, fair, and transparent processing of your personal data pursuant to the UK General Data Protection Regulation (the "**UK GDPR**"). Specifically:

- the sharing of your employment contract between MUN UK Limited and Memorial was necessary for the performance of your employment contract and constituted lawful processing pursuant to section 1(b) of Article 6 of the UK GDPR; and
- the disclosure of your employment contract, with redactions, to the requester is necessary for compliance with a legal obligation to which Memorial and/or MUN UK Limited is subject and constitutes lawful processing pursuant to section 1(c) of Article 6 of the UK GDPR.

If you wish to discuss this decision further, you are welcome to arrange a meeting with Memorial's General Counsel, Scott Worsfold, by contacting the Office of General Counsel by telephone at 709-864-6481 or by email at generalcounsel@mun.ca. Mr. Worsfold [REDACTED]

s. 40 (1)

[REDACTED] and he will be available to meet with you thereafter.

Sincerely,

[REDACTED]

s. 40 (1)

Janet Morrison, PhD
President and Vice-Chancellor

Ref: O/JM/XU-0826 (2025)

From: Worsfold, Scott
To: Koren Thomson; Jayna Green
Cc: Raske, Matthew
Subject: FW: Correspondence from Dr. J. Morrison
Date: Thursday, September 4, 2025 2:40:00 PM
Importance: High

Hi Koren and Jayna:

Please see below from Jingjing.

[REDACTED] s. 30 (1)(a)

Thanks,
 Scott



Scott Worsfold, BA, M.Div., LLB
 General Counsel
 Office of the General Counsel
 Arts & Administration Building Rm A-1005
 230 Elizabeth Ave.,
 PO Box 4200
 St. John's, NL
 A1C 5S7
 T: 709-864-7695
 E: dsworsfold@mun.ca

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From: Xu, Jingjing <jingjingx@mun.ca>
Sent: Thursday, September 4, 2025 2:37 PM
To: Worsfold, Scott <dsworsfold@mun.ca>
Cc: President, The <munpres@mun.ca>; J XU [REDACTED] s. 40 (1)
Subject: Re: Correspondence from Dr. J. Morrison
Importance: High

Dear Scott,

Thank you for your response.

s. 30 (1)(a)

s. 30 (1)(a)

s. 30 (1)(a)

s. 30 (1)(a)

s. 30 (1)(a)

s. 30 (1)(a)

I ask that you confirm by return that no disclosure will occur until these matters are resolved. I also expect a full response and provision of the requested records prior to any further action.

Yours sincerely,

Dr. Jingjing Xu

Prof. Jingjing Xu, PhD, FRIN, FHEA, MNI

Associate Vice-President (Harlow Campus and Global Partnerships)

Memorial University of Newfoundland

Address:

Harlow Campus

The Maltings

Harlow, Essex, CM17 0AJ

United Kingdom

From: Worsfold, Scott <dsworsfold@mun.ca>

Date: Thursday, 4 September 2025 at 14:57

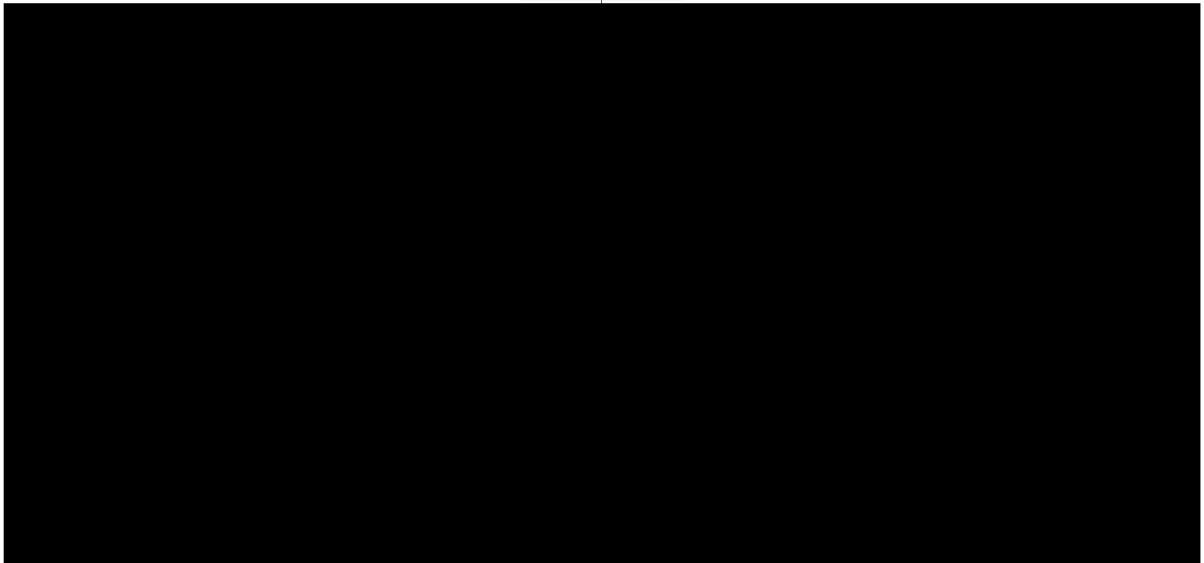
To: Xu, Jingjing <jingjingx@mun.ca>

Cc: President, The <munpres@mun.ca>, J XU [REDACTED] s. 40 (1)

Subject: RE: Correspondence from Dr. J. Morrison

Hi Jingjing:

s. 30 (1)(a)



As a result of the foregoing, Memorial has taken steps to withdraw its Application to court, which will necessitate the disclosure of your employment contract, subject to redactions of your home address and signatures.

I am still available to meet if you would like.

Scott



Scott Worsfold, BA, M.Div., LLB

General Counsel

Office of the General Counsel

Arts & Administration Building Rm A-1005

230 Elizabeth Ave.,

PO Box 4200

St. John's, NL

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From: Xu, Jingjing <jingjingx@mun.ca>
Sent: Wednesday, September 3, 2025 10:05 AM
To: Worsfold, Scott <dsworsfold@mun.ca>
Cc: President, The <munpres@mun.ca>; J XU [REDACTED] s. 40 (1)
Subject: Re: Correspondence from Dr. J. Morrison
Importance: High

Dear Scott,

Thank you for your email. I appreciate your willingness to meet and remain available. I must respond in writing to ensure the matter is clearly documented, [REDACTED]

[REDACTED] s. 30 (1)(a)

[REDACTED]
s. 30 (1)(a)

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: Worsfold, Scott
To: Koren Thomson; Jayna Green
Cc: Raske, Matthew
Subject: RE: Correspondence from Dr. J. Morrison
Date: Thursday, September 4, 2025 3:20:00 PM

s. 30 (1)(a)

Thanks,
 Scott



Scott Worsfold, BA, M.Div., LLB
 General Counsel
 Office of the General Counsel
 Arts & Administration Building Rm A-1005
 230 Elizabeth Ave.,
 PO Box 4200
 St. John's, NL
 A1C 5S7
 T: 709-864-7695
 E: dsworsfold@mun.ca

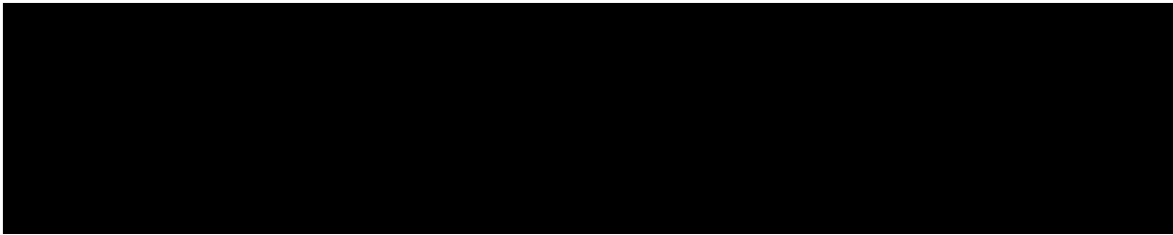
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From: Koren Thomson <kthomson@stewartmckelvey.com>
Sent: Thursday, September 4, 2025 3:12 PM
To: Worsfold, Scott <dsworsfold@mun.ca>; Jayna Green <jgreen@stewartmckelvey.com>
Cc: Raske, Matthew <mraske@mun.ca>
Subject: RE: Correspondence from Dr. J. Morrison

Hi Scott,

s. 40 (1)

s. 30 (1)(a)

s. 30 (1)(a)

Koren

Koren A. Thomson

Partner
Stewart McKelvey
D. 709.570.8848

From: Worsfold, Scott <dsworsfold@mun.ca>
Sent: Thursday, September 4, 2025 2:41 PM
To: Koren Thomson <kthomson@stewartmckelvey.com>; Jayna Green <jgreen@stewartmckelvey.com>
Cc: Raske, Matthew <mraske@mun.ca>
Subject: FW: Correspondence from Dr. J. Morrison
Importance: High

This is an external email.

Hi Koren and Jayna:

Please see below from Jingjing.

s. 30 (1)(a)

Thanks,
Scott



Scott Worsfold, BA, M.Div., LLB
General Counsel
Office of the General Counsel
Arts & Administration Building Rm A-1005
230 Elizabeth Ave.,
PO Box 4200
St. John's, NL
A1C 5S7

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: [Worsfold, Scott](#)
To: [Xu, Jingjing](#)
Cc: [President, The; J XU](#)
Bcc: [Raske, Matthew](#); [Koren Thomson](#); [Jayna Green](#)
Subject: RE: Correspondence from Dr. J. Morrison
Date: Friday, September 5, 2025 9:47:00 AM

WITHOUT PREJUDICE

Jingjing:

[REDACTED] s. 30 (1)(a)

[REDACTED] s. 30 (1)(a)

Thanks,
Scott



Scott Worsfold, BA, M.Div., LLB
General Counsel
Office of the General Counsel
Arts & Administration Building Rm A-1005
230 Elizabeth Ave.,
PO Box 4200
St. John's, NL
A1C 5S7
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From: Xu, Jingjing <jingjingx@mun.ca>
Sent: Thursday, September 4, 2025 2:37 PM

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: [Jayna Green](#)
To: [Worsfold, Scott](#); [Koren Thomson](#)
Cc: [Raske, Matthew](#)
Subject: RE: Correspondence from Dr. J. Morrison
Date: Wednesday, September 17, 2025 2:30:22 PM

Solicitor-Client Privileged

Good afternoon Scott & Matthew,

[REDACTED]

s. 30 (1)(a)

Kind regards,
Jayna

Without Prejudice

s. 30 (1)(a)

[REDACTED]

Jayna Green

Associate

She/Her

Stewart McKelvey

D: 709.570.8864

From: Worsfold, Scott <dsworsfold@mun.ca>
Sent: Thursday, September 4, 2025 4:20 PM
To: Koren Thomson <kthomson@stewartmckelvey.com>; Jayna Green <jgreen@stewartmckelvey.com>
Cc: Raske, Matthew <mraske@mun.ca>
Subject: RE: Correspondence from Dr. J. Morrison

This is an external email.

Could we say 10 tomorrow? [REDACTED] s. 30 (1)(a)



Scott Worsfold, BA, M.Div., LLB
General Counsel
Office of the General Counsel
Arts & Administration Building Rm A-1005
230 Elizabeth Ave.,
PO Box 4200
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From: Koren Thomson <kthomson@stewartmckelvey.com>
Sent: Thursday, September 4, 2025 4:17 PM
To: Worsfold, Scott <dsworsfold@mun.ca>; Jayna Green <jgreen@stewartmckelvey.com>
Cc: Raske, Matthew <mraske@mun.ca>
Subject: RE: Correspondence from Dr. J. Morrison

Hi Scott,

No problem. I have meetings from 11 until 1 tomorrow but am otherwise available. Is there a particular time that works well for you? [REDACTED] s. 30 (1)(a)

Thanks,
Koren

Koren A. Thomson

Partner
Stewart McKelvey
D: 709.570.8848

From: Worsfold, Scott <dsworsfold@mun.ca>
Sent: Thursday, September 4, 2025 3:44 PM
To: Koren Thomson <kthomson@stewartmckelvey.com>; Jayna Green <jgreen@stewartmckelvey.com>
Cc: Raske, Matthew <mraske@mun.ca>
Subject: RE: Correspondence from Dr. J. Morrison

This is an external email.

[REDACTED]
[REDACTED] s. 30 (1)(a)

Scott



Scott Worsfold, BA, M.Div., LLB
General Counsel
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A1C 5S7
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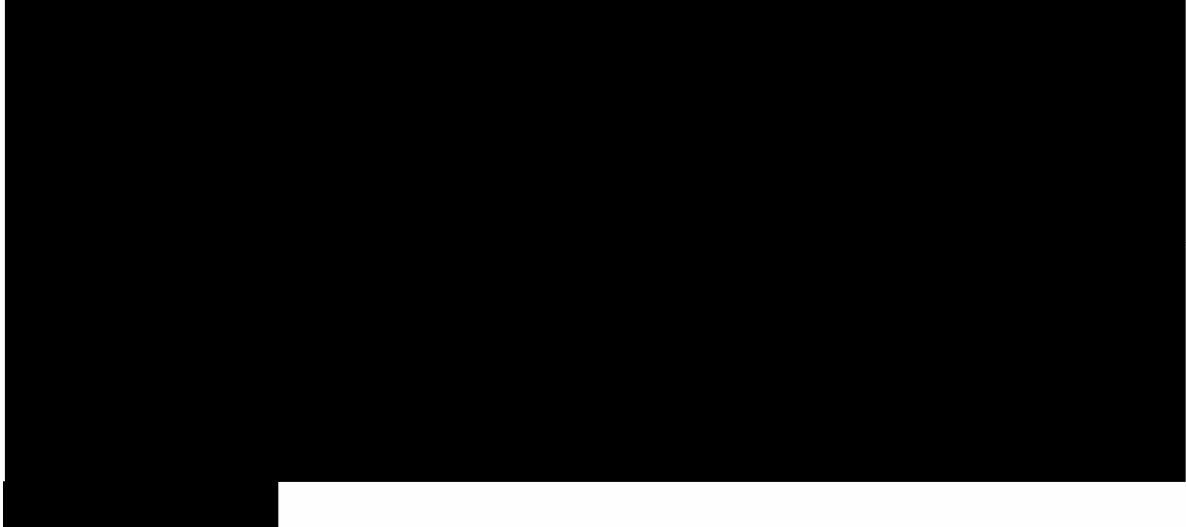
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NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: Koren Thomson
To: Worsfold, Scott
Cc: Noseworthy, Maggie; Jayna Green
Subject: 202501G2260 - Neil Bose in re: Access to Information and Protection of Privacy Act [Report A-2025-015]
Date: Thursday, October 2, 2025 12:12:29 PM

Hi Scott,



s. 30 (1)(a)

Koren



Koren A. Thomson
Partner
D: 709.570.8848
kthomson@stewartmckelvey.com
stewartmckelvey.com

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From: Worsfold, Scott
To: [REDACTED] s. 40 (1)
Bcc: "Koren Thomson"; Jayna Green
Subject: RE: Correspondence from Dr. J. Morrison
Date: Wednesday, October 15, 2025 12:53:00 PM

WITHOUT PREJUDICE

Good day Jingjing:

I hope you are doing well. I am writing as a follow up to our last exchange. [REDACTED]

s. 30 (1)(a)

s. 30 (1)(a)

[REDACTED] s. 30 (1)(a)

Thanks,

Scott



Scott Worsfold, BA, M.Div., LLB
General Counsel
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From: Worsfold, Scott

Sent: Friday, September 5, 2025 9:48 AM

To: Xu, Jingjing <jingjingx@mun.ca>

Cc: President, The <munpres@mun.ca>; [REDACTED] s. 40 (1)

Subject: RE: Correspondence from Dr. J. Morrison

WITHOUT PREJUDICE

Jingjing:

[REDACTED] s. 30 (1)(a)

[REDACTED] s. 30 (1)(a)

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: Worsfold, Scott
To: "Koren Thomson"
Subject: FW: Correspondence from Dr. J. Morrison
Date: Tuesday, October 28, 2025 10:20:00 AM

Hi Koren:

Below is the email I sent to Dr. Xu on October 15 and have received no response.

Thanks,
 Scott



Scott Worsfold, BA, M.Div., LLB
 General Counsel
 Office of the General Counsel
 Arts & Administration Building Rm A-1005
 230 Elizabeth Ave.,
 PO Box 4200
 St. John's, NL
 A1C 5S7
 T: 709-864-7695
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From: Worsfold, Scott
Sent: Wednesday, October 15, 2025 12:54 PM
To: [REDACTED]
Subject: RE: Correspondence from Dr. J. Morrison

s. 40 (1)

WITHOUT PREJUDICE

Good day Jingjing:

I hope you are doing well. I am writing as a follow up to our last exchange.

s. 30 (1)(a)

s. 30 (1)(a)

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: [Worsfold, Scott](#)
To: [Koren Thomson](#)
Subject: RE: Correspondence from Dr. J. Morrison
Date: Friday, October 31, 2025 9:45:00 AM

Hi Koren:

[REDACTED] s. 30 (1)(a)

[REDACTED] s. 30 (1)(a)

Thanks,
Scott



Scott Worsfold, BA, M.Div., LLB
General Counsel
Office of the General Counsel
Arts & Administration Building Rm A-1005
230 Elizabeth Ave.,
PO Box 4200
St. John's, NL
A1C 5S7
T: 709-864-7695
E: dsworsfold@mun.ca

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From: Koren Thomson <kthomson@stewartmckelvey.com>
Sent: Thursday, October 30, 2025 5:14 PM
To: Worsfold, Scott <dsworsfold@mun.ca>
Subject: Fw: Correspondence from Dr. J. Morrison

Hi there,

I haven't received a response to this, or a read receipt, which I requested.

[REDACTED] s. 30 (1)(a)

[REDACTED]

[REDACTED] s. 30 (1)(a)

Koren

From: Koren Thomson

Sent: Tuesday, October 28, 2025 10:54:24 AM

To: [REDACTED] s. 40 (1)

Cc: Joanne Taylor <jmtaylor@stewartmckelvey.com>; Jayna Green <jgreen@stewartmckelvey.com>; Worsfold, Scott <dsworsfold@mun.ca>

Subject: FW: Correspondence from Dr. J. Morrison

Good Morning, Dr. Xu:

We are external counsel for Memorial University in Newfoundland and Labrador, and I am writing to follow up [REDACTED]

s. 30 (1)(a)

[REDACTED] We are in case management with a Justice of the Supreme Court of Newfoundland next Tuesday, November 4th, at which time we must advise the Court of Memorial's intentions.

[REDACTED]

s. 30 (1)(a)

If you would like to discuss this further, you can call me at [REDACTED] I am happy to provide further information and discuss next steps with you.

s. 40 (1)

Respectfully,

Koren A. Thomson

Partner
Stewart McKelvey
D: 709 570.8848

From: Worsfold, Scott <dsworsfold@mun.ca>

Sent: Tuesday, October 28, 2025 10:20 AM

To: Koren Thomson <kthomson@stewartmckelvey.com>

Subject: FW: Correspondence from Dr. J. Morrison

This is an external email.



Scott Worsfold, BA, M.Div., LLB
General Counsel
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From: Worsfold, Scott

Sent: Wednesday, October 15, 2025 12:54 PM

To: [REDACTED] s. 40 (1)

Subject: RE: Correspondence from Dr. J. Morrison

WITHOUT PREJUDICE

Good day Jingjing:

I hope you are doing well. I am writing as a follow up to our last exchange. [REDACTED]

s. 30 (1)(a)

s. 30 (1)(a)

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: Koren Thomson
To: J XU
Cc: Joanne Taylor; Jayna Green; Worsfold, Scott
Subject: RE: Correspondence from Dr. J. Morrison
Date: Friday, October 31, 2025 12:54:51 PM
Importance: High

Dear Ms. Xu:

Thank your email below. [REDACTED]

s. 30 (1)(a)

s. 30 (1)(a)

We will be in Court on this matter next week.

Sincerely,

Koren A. Thomson

Partner
Stewart McKelvey
D: 709.570.8848

From: J XU [REDACTED] s. 40 (1)

Sent: Friday, October 31, 2025 8:59 AM

To: Koren Thomson <kthomson@stewartmckelvey.com>

Cc: Joanne Taylor <jmtaylor@stewartmckelvey.com>; Jayna Green <jgreen@stewartmckelvey.com>;
Worsfold, Scott <dsworsfold@mun.ca>

Subject: Re: Correspondence from Dr. J. Morrison

This is an external email.

Dear Ms Thomson,

Dear Mr Worsfold,

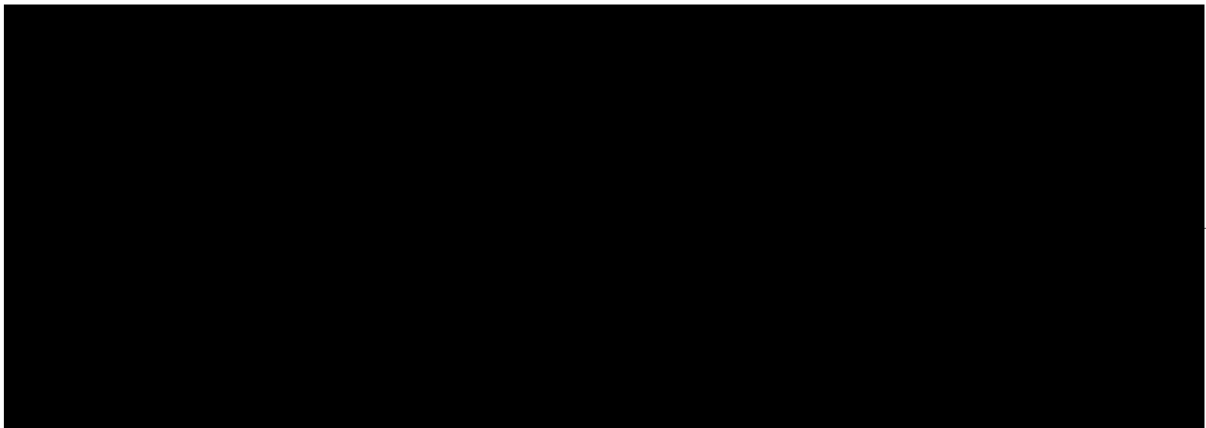
Thank you for your email. Please accept my apologies for the delay in responding - [REDACTED] s. 40 (1)

For the record, I confirm that I have now left my employment with MUN UK Ltd and have
taken up a senior academic role at a UK university. [REDACTED]

s. 40 (1)

[REDACTED] s. 40 (1)

[REDACTED] s. 30 (1)(a)



s. 30 (1)(a)

Kind regards,

Dr Jingjing Xu

From: Koren Thomson <kthomson@stewartmckelvey.com>

Sent: 28 October 2025 13:24

To: [REDACTED] s. 40 (1)

Cc: Joanne Taylor <jmtaylor@stewartmckelvey.com>; Jayna Green <jgreen@stewartmckelvey.com>; Worsfold, Scott <dsworsfold@mun.ca>

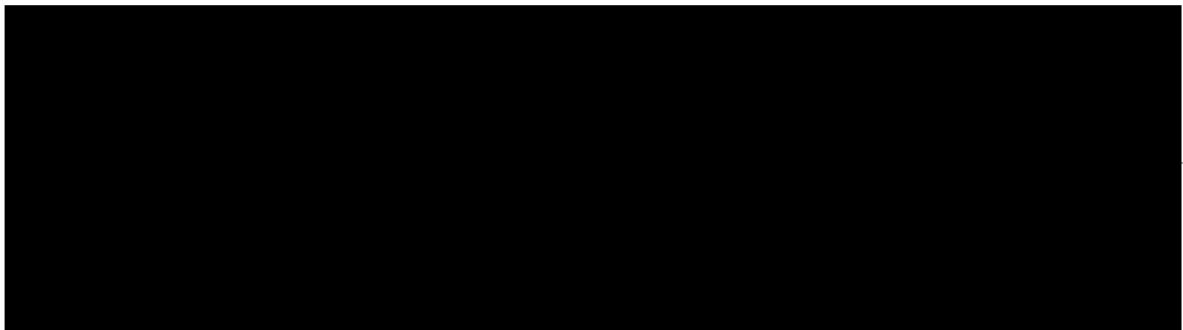
Subject: FW: Correspondence from Dr. J. Morrison

Good Morning, Dr. Xu:

We are external counsel for Memorial University in Newfoundland and Labrador, and I am writing to follow up [REDACTED]

s. 30 (1)(a)

[REDACTED] We are in case management with a Justice of the Supreme Court of Newfoundland next Tuesday, November 4th, at which time we must advise the Court of Memorial's intentions.



s. 30 (1)(a)

If you would like to discuss this further, you can call me at [REDACTED] I am happy to provide further information and discuss next steps with you.

s. 40 (1)

Respectfully,

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: Koren Thomson
To: J XU
Cc: Joanne Taylor; Jayna Green; Worsfold, Scott
Subject: RE: Correspondence from Dr. J. Morrison
Date: Monday, November 3, 2025 3:03:47 PM

Thank you, Dr. Xu.

[REDACTED]

s. 30 (1)(a)

Thanks again,

Koren A. Thomson

Partner
Stewart McKelvey
D: 709.570.8848

From: J XU [REDACTED] s. 40 (1)
Sent: Friday, October 31, 2025 1:54 PM
To: Koren Thomson <kthomson@stewartmckelvey.com>
Cc: Joanne Taylor <jmtaylor@stewartmckelvey.com>; Jayna Green <jgreen@stewartmckelvey.com>; Worsfold, Scott <dsworsfold@mun.ca>
Subject: Re: Correspondence from Dr. J. Morrison

This is an external email.

Dear Ms Thomson,

Thank you for your message.

[REDACTED]

s. 30 (1)(a)

[REDACTED]

Kind regards.

Dr. Jingjing Xu

From: Koren Thomson <kthomson@stewartmckelvey.com>
Sent: 31 October 2025 15:24

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: Koren Thomson
To: Noseworthy, Maggie
Cc: Worsfold, Scott
Subject: FW: Correspondence from Dr. J. Morrison
Date: Monday, November 3, 2025 3:16:09 PM

Hi Maggie,

s. 30 (1)(a)

See below. [REDACTED]

Warm Regards,
Koren

Koren A. Thomson
Partner
Stewart McKelvey
D: 709.570.8848

From: Koren Thomson
Sent: Monday, November 3, 2025 3:03 PM
To: 'J XU' [REDACTED] s. 40 (1)
Cc: Joanne Taylor <jmtaylor@stewartmckelvey.com>; Jayna Green <jgreen@stewartmckelvey.com>;
Worsfold, Scott <dsworsfold@mun.ca>
Subject: RE: Correspondence from Dr. J. Morrison

Thank you, Dr. Xu.

[REDACTED] s. 30 (1)(a)

Thanks again,

Koren A. Thomson
Partner
Stewart McKelvey
D: 709.570.8848

From: J XU [REDACTED] s. 40 (1)
Sent: Friday, October 31, 2025 1:54 PM
To: Koren Thomson <kthomson@stewartmckelvey.com>
Cc: Joanne Taylor <jmtaylor@stewartmckelvey.com>; Jayna Green <jgreen@stewartmckelvey.com>;
Worsfold, Scott <dsworsfold@mun.ca>
Subject: Re: Correspondence from Dr. J. Morrison

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: [Worsfold, Scott](#)
To: [Koren Thomson](#)
Cc: [Noseworthy, Maggie](#)
Subject: FW: Jingjing
Date: Friday, November 14, 2025 2:06:00 PM

Hi Koren:

Please see below from the president and Roxanne Millan – who are both over in Harlow right now.

[REDACTED] s. 30 (1)(a)

[REDACTED] s. 30 (1)(a)

Scott



Scott Worsfold, BA, M.Div., LLB
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From: Morrison, Janet <jmorrison@mun.ca>
Sent: Friday, November 14, 2025 7:03 AM
To: Millan, Roxanne <rmillan@mun.ca>; Worsfold, Scott <dsworsfold@mun.ca>
Subject: Re: Jingjing

I just asked (because I'm here). [REDACTED] s. 30 (1)(a)

Thx,
JM

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From: Millan, Roxanne <rmillan@mun.ca>
Sent: Friday, November 14, 2025 10:11:05 AM
To: Worsfold, Scott <dsworsfold@mun.ca>
Cc: Morrison, Janet <jmorrison@mun.ca>
Subject: Re: Jingjing

Hi Scott,

For sure, I will check with Noreen O'Prey. I have spent the past couple of days with Noreen and Team. [REDACTED] s. 30 (1)(a)

All the best,
Roxanne

ROXANNE MILLAN, DIRECTOR OF RESOURCE ALLOCATION AND PLANNING

Office of the Provost and Vice-President (Academic)
Memorial University of Newfoundland
St. John's, NL

709-864-8246
rmillan@mun.ca

From: Worsfold, Scott <dsworsfold@mun.ca>
Sent: Thursday, November 13, 2025 7:54:27 PM
To: Millan, Roxanne <rmillan@mun.ca>
Cc: Morrison, Janet <jmorrison@mun.ca>
Subject: Jingjing

Hi Roxanne:

The litigation with OIPC over the release of Jingjing's contract is still ongoing. [REDACTED]

[REDACTED] s. 30 (1)(a)

Thanks,
Scott



Scott Worsfold, BA, M.Div., LLB
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From: Koren Thomson
To: J XU
Cc: Joanne Taylor; Jayna Green; Worsfold, Scott
Subject: RE: Correspondence from Dr. J. Morrison
Date: Friday, November 14, 2025 2:10:43 PM

Good Afternoon, Dr. Xu:

I'm writing to give you an update on the NL proceedings. Owing to conflicting court matters for Counsel for the NL Information and Privacy Commissioner, our case management meeting has been rescheduled several times. It is currently scheduled to proceed on December 12th. I will send you another update following that appearance. [REDACTED]

s. 30 (1)(a)

Thank you in advance,
Koren

Koren A. Thomson
Partner
Stewart McKelvey
D: 709.570.8848

From: J XU [REDACTED] s. 40 (1)
Sent: Tuesday, November 4, 2025 6:09 AM
To: Koren Thomson <kthomson@stewartmckelvey.com>
Cc: Joanne Taylor <jmtaylor@stewartmckelvey.com>; Jayna Green <jgreen@stewartmckelvey.com>; Worsfold, Scott <dsworsfold@mun.ca>
Subject: Re: Correspondence from Dr. J. Morrison

This is an external email.

Dear Ms Thomson,

Thank you for your message. [REDACTED] s. 30 (1)(a)

Kind regards,

Dr. Jingjing Xu

From: Koren Thomson <kthomson@stewartmckelvey.com>
Sent: 03 November 2025 18:33
To: J XU [REDACTED] s. 40 (1)

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: [Koren Thomson](#)
To: J XU
Cc: [Joanne Taylor](#); [Jayna Green](#); [Worsfold, Scott](#); [Noseworthy, Maggie](#)
Subject: RE: Correspondence from Dr. J. Morrison
Date: Thursday, December 4, 2025 12:17:20 PM

Good Morning, Dr. Xu:

I am writing to follow up on the below. We have court next week. [REDACTED] s. 30 (1)(a)

[REDACTED]

Thanks again,
 Koren

Koren A. Thomson

Partner
 Stewart McKelvey
 D: 709.570.8848

From: Koren Thomson
Sent: Friday, November 14, 2025 2:10 PM
To: J XU [REDACTED] s. 40 (1)
Cc: Joanne Taylor <jmtaylor@stewartmckelvey.com>; Jayna Green <jgreen@stewartmckelvey.com>;
 Worsfold, Scott <dsforsfold@mun.ca>
Subject: RE: Correspondence from Dr. J. Morrison

Good Afternoon, Dr. Xu:

I'm writing to give you an update on the NL proceedings. Owing to conflicting court matters for Counsel for the NL Information and Privacy Commissioner, our case management meeting has been rescheduled several times. It is currently scheduled to proceed on December 12th. I will send you another update following that appearance. [REDACTED]

s. 30 (1)(a)

[REDACTED]

Thank you in advance,
 Koren

Koren A. Thomson

Partner
 Stewart McKelvey
 D: 709.570.8848

From: J XU [REDACTED] s. 40 (1)
Sent: Tuesday, November 4, 2025 6:09 AM
To: Koren Thomson <kthomson@stewartmckelvey.com>
Cc: Joanne Taylor <jmtaylor@stewartmckelvey.com>; Jayna Green <jgreen@stewartmckelvey.com>;
 Worsfold, Scott <dsforsfold@mun.ca>

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: [Koren Thomson](#)
To: [Worsfold, Scott](#)
Cc: [Jayna Green](#); [Noseworthy, Maggie](#)
Subject: FW: Correspondence from Dr. J. Morrison
Date: Thursday, December 11, 2025 9:57:49 AM

Hi Scott,

[REDACTED] s. 30 (1)(a)

Thanks,
Koren

Koren A. Thomson

Partner
Stewart McKelvey
D: 709.570.8848

From: J XU [REDACTED] s. 40 (1)
Sent: Wednesday, December 10, 2025 6:41 PM
To: Koren Thomson <kthomson@stewartmckelvey.com>
Cc: Joanne Taylor <jmtaylor@stewartmckelvey.com>; Jayna Green <jgreen@stewartmckelvey.com>;
Worsfold, Scott <dsforsfold@mun.ca>; Noseworthy, Maggie <maggie.noseworthy@mun.ca>
Subject: Re: Correspondence from Dr. J. Morrison

This is an external email.

Dear Ms Thomson,

Thank you for the update.

[REDACTED] s. 30 (1)(a)

Kind regards,

Dr. Jingjing Xu

From: Koren Thomson <kthomson@stewartmckelvey.com>
Sent: 04 December 2025 15:46
To: J XU [REDACTED] s. 40 (1)

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: [Worsfold, Scott](#)
To: [Koren Thomson](#)
Cc: [Jayna Green](#); [Noseworthy, Maggie](#)
Subject: RE: Correspondence from Dr. J. Morrison
Date: Thursday, December 11, 2025 10:05:00 AM

[REDACTED] s. 30 (1)(a)



Scott Worsfold, BA, M.Div., LLB
 General Counsel
 Office of the General Counsel
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From: Koren Thomson <kthomson@stewartmckelvey.com>
Sent: Thursday, December 11, 2025 9:57 AM
To: Worsfold, Scott <dsworsfold@mun.ca>
Cc: Jayna Green <jgreen@stewartmckelvey.com>; Noseworthy, Maggie <maggie.noseworthy@mun.ca>
Subject: FW: Correspondence from Dr. J. Morrison

Hi Scott,

[REDACTED] s. 30 (1)(a)

Thanks,
 Koren

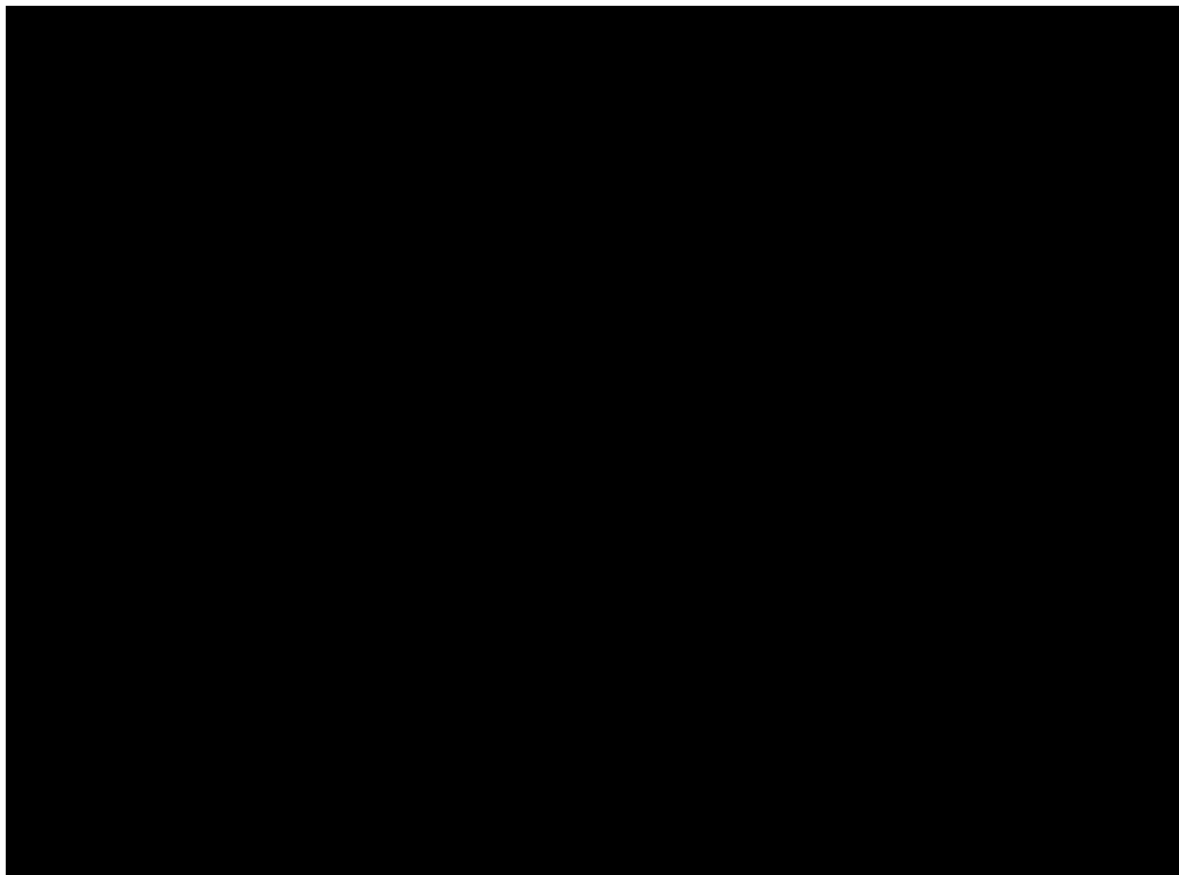
Koren A. Thomson
 Partner
 Stewart McKelvey
 D: 709.570.8848

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

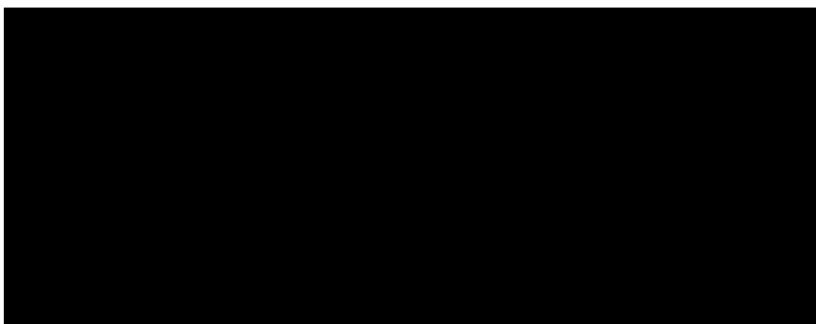
From: [Jayna Green](#)
To: [Worsfold, Scott](#)
Cc: [Koren Thomson](#)
Subject: FW: [REDACTED] - Case Reference IC-395712-Q6W2
Date: Thursday, January 15, 2026 1:20:14 PM

Good afternoon Scott,



s. 30 (1)(a)

Thank you,
Jayna
Jayna Green
Associate
She/Her
Stewart McKelvey
D: 709.570.8864



s. 30 (1)(a)

From: [Worsfold, Scott](#)
To: ["Jayna Green"](#)
Cc: [Koren Thomson](#)
Subject: RE: [REDACTED] Case Reference IC-395712-Q6W2
Date: Thursday, January 15, 2026 2:26:00 PM

Thanks so much Jayna, [REDACTED] s. 30 (1)(a)

Thanks [REDACTED] s. 30 (1)(a)

Scott



Scott Worsfold, BA, M.Div., LLB
General Counsel
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From: Jayna Green <jgreen@stewartmckelvey.com>
Sent: Thursday, January 15, 2026 1:20 PM
To: Worsfold, Scott <dsworsfold@mun.ca>
Cc: Koren Thomson <kthomson@stewartmckelvey.com>
Subject: FW: [REDACTED] Case Reference IC-395712-Q6W2

Good afternoon Scott, [REDACTED] s. 30 (1)(a)

I hope you're doing well. [REDACTED]

s. 30 (1)(a)

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: Koren Thomson
To: Noseworthy, Maggie; Worsfold, Scott; Josh Merrigan
Cc: Jayna Green; Joanne Taylor
Subject: Re: Dr. Xu Contract - Instructions Sought for Court on Thursday
Date: Tuesday, February 3, 2026 8:57:40 AM
Attachments: image002.png

Thank you. [REDACTED] s. 30 (1)(a)

I'm the meantime, I've copied Josh Merrigan. Josh is up to speed on the file and will appear at the case management meeting to convey your position (once confirmed).

Warm Regards,
Koren

From: Noseworthy, Maggie <maggie.noseworthy@mun.ca>
Sent: Tuesday, February 3, 2026 8:14:44 AM
To: Worsfold, Scott <dsworsfold@mun.ca>; Koren Thomson <kthomson@stewartmckelvey.com>
Cc: Jayna Green <jgreen@stewartmckelvey.com>; Joanne Taylor <jmtaylor@stewartmckelvey.com>
Subject: Re: Dr. Xu Contract - Instructions Sought for Court on Thursday

This is an external email.

Good morning,

[REDACTED] s. 30 (1)(a)

Thanks,
M

From: Worsfold, Scott <dsworsfold@mun.ca>
Sent: February 2, 2026 8:23 PM
To: Koren Thomson <kthomson@stewartmckelvey.com>; Noseworthy, Maggie <maggie.noseworthy@mun.ca>
Cc: Jayna Green <jgreen@stewartmckelvey.com>; Joanne Taylor <jmtaylor@stewartmckelvey.com>
Subject: Re: Dr. Xu Contract - Instructions Sought for Court on Thursday

Hi Koren

[REDACTED] s. 30 (1)(a)

Scott

Get [Outlook for Android](#)

From: Koren Thomson <kthomson@stewartmckelvey.com>
Sent: Monday, February 2, 2026 3:43:35 PM
To: Worsfold, Scott <dsworsfold@mun.ca>; Noseworthy, Maggie <maggie.noseworthy@mun.ca>
Cc: Jayna Green <jgreen@stewartmckelvey.com>; Joanne Taylor <jmtaylor@stewartmckelvey.com>
Subject: Dr. Xu Contract - Instructions Sought for Court on Thursday

Hi Scott & Maggie:

[REDACTED] s. 30 (1)(a)

Our next Court date is this Thursday. Jayna is in arbitration and [REDACTED] but will ensure that

s. 40 (1)

someone is in attendance for Memorial.

s. 30 (1)(a)

I'm [REDACTED] but can be available to discuss if needed.

Thank you in advance,
Koren

s. 40 (1)



Koren A. Thomson
Partner
D: 709 570 8848
kthomson@stewartmckelvey.com
stewartmckelvey.com

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From: Josh Merrigan
To: Worsfold, Scott; Koren Thomson; Noseworthy, Maggie
Cc: Joanne Taylor
Subject: RE: Dr. Xu Contract - Instructions Sought for Court on Thursday
Date: Wednesday, February 4, 2026 11:45:44 AM
Attachments: image002.png

Hi Scott,

Thank you, instructions are understood. I am up to speed on the matter and subject to any further issues you would like to discuss then I don't anticipate needing a call in advance of the case management.

In the meantime, if there is anything that comes up that you would like to discuss in advance please let me know and I would be happy to arrange a quick call.

Best regards,
 Josh

Josh Merrigan
 Associate
 Stewart McKelvey
 D: 709 570 8820

From: Worsfold, Scott <dsworsfold@mun.ca>
Sent: Wednesday, February 4, 2026 11:04 AM
To: Koren Thomson <kthomson@stewartmckelvey.com>; Noseworthy, Maggie <maggie.noseworthy@mun.ca>; Josh Merrigan <jmerrigan@stewartmckelvey.com>
Cc: Joanne Taylor <jmtaylor@stewartmckelvey.com>
Subject: RE: Dr. Xu Contract - Instructions Sought for Court on Thursday

This is an external email.

Hi all:

I had a brief meeting with the president this morning and we are good to go.

Josh if you need to meet with me before the case management let me know.

Scott



Scott Worsfold, BA, M.Div., LLB
 General Counsel
 Office of the General Counsel
 Arts & Administration Building Rm A-1005
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 PO Box 4200
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 A1C 5S7
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From: Koren Thomson <kthomson@stewartmckelvey.com>
Sent: Wednesday, February 4, 2026 7:55 AM
To: Worsfold, Scott <dsworsfold@mun.ca>; Noseworthy, Maggie <maggie.noseworthy@mun.ca>; Josh Merrigan <jmerrigan@stewartmckelvey.com>
Cc: Joanne Taylor <jmtaylor@stewartmckelvey.com>
Subject: Re: Dr. Xu Contract - Instructions Sought for Court on Thursday

Good Morning:

I'm following up on the below. [REDACTED] s. 30 (1)(a)

Thanks in advance,
 Koren

From: Worsfold, Scott <dsworsfold@mun.ca>
Sent: Monday, February 2, 2026 7:53:58 PM
To: Koren Thomson <kthomson@stewartmckelvey.com>; Noseworthy, Maggie <maggie.noseworthy@mun.ca>
Cc: Jayna Green <jgreen@stewartmckelvey.com>; Joanne Taylor <jmtaylor@stewartmckelvey.com>
Subject: Re: Dr. Xu Contract - Instructions Sought for Court on Thursday

This is an external email.

Hi Koren

[REDACTED] s. 30 (1)(a)

Scott

Get Outlook for Android

From: Koren Thomson <kthomson@stewartmckelvey.com>
Sent: Monday, February 2, 2026 3:43:35 PM
To: Worsfold, Scott <dsworsfold@mun.ca>; Noseworthy, Maggie <maggie.noseworthy@mun.ca>
Cc: Jayna Green <jgreen@stewartmckelvey.com>; Joanne Taylor <jmtaylor@stewartmckelvey.com>
Subject: Dr. Xu Contract - Instructions Sought for Court on Thursday

Hi Scott & Maggie:

s. 30 (1)(a)

[REDACTED]

Our next Court date is this Thursday. Jayna is in arbitration and [REDACTED] but will ensure that someone is in attendance for Memorial. [REDACTED]

s. 40 (1)

s. 30 (1)(a)

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: Josh Merrigan
To: Worsfold, Scott; Koren Thomson; Noseworthy, Maggie
Cc: Joanne Taylor
Subject: RE: Dr. Xu Contract - Instructions Sought for Court on Thursday
Date: Thursday, February 5, 2026 12:44:09 PM
Attachments: image002.png

Hi Scott,

Writing to advise that I appeared on this matter this morning. Andy Fitzgerald appeared for the OIPC and [REDACTED] s. 40 (1) [REDACTED] did not appear.

I advised the Memorial is prepared to release the contract and comply with the OIPC recommendation. Andy asked for leave to file a consent order to resolve the matter and Justice Ryan granted leave.

Please let us know if you have any questions or would like to discuss further.

Best regards,
Josh

Josh Merrigan
Associate
Stewart McKelvey
D. 709.570.8820

From: Worsfold, Scott <dsworsfold@mun.ca>
Sent: Wednesday, February 4, 2026 11:04 AM
To: Koren Thomson <kthomson@stewartmckelvey.com>; Noseworthy, Maggie <maggie.noseworthy@mun.ca>; Josh Merrigan <jmerrigan@stewartmckelvey.com>
Cc: Joanne Taylor <jmtaylor@stewartmckelvey.com>
Subject: RE: Dr. Xu Contract - Instructions Sought for Court on Thursday

This is an external email.

Hi all:

I had a brief meeting with the president this morning and we are good to go.

Josh if you need to meet with me before the case management let me know.

Scott



Scott Worsfold, BA, M.Div., LLB
General Counsel
Office of the General Counsel
Arts & Administration Building Rm A-1005
230 Elizabeth Ave.,
PO Box 4200
St. John's, NL
A1C 5S7
T: 709-864-7695
E: dsworsfold@mun.ca

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: Worsfold, Scott
To: Josh Merrigan; Koren Thomson; Noseworthy, Maggie
Cc: Joanne Taylor
Subject: RE: Dr. Xu Contract - Instructions Sought for Court on Thursday
Date: Thursday, February 5, 2026 12:56:00 PM
Attachments: image002.png

Thanks Josh:

s. 30 (1)(a)

Thanks,
 Scott



Scott Worsfold, BA, M.Div., LLB
 General Counsel
 Office of the General Counsel
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From: Josh Merrigan <jmerrigan@stewartmckelvey.com>
Sent: Thursday, February 5, 2026 12:43 PM
To: Worsfold, Scott <dsworsfold@mun.ca>; Koren Thomson <kthomson@stewartmckelvey.com>; Noseworthy, Maggie <maggie.noseworthy@mun.ca>
Cc: Joanne Taylor <jmtaylor@stewartmckelvey.com>
Subject: RE: Dr. Xu Contract - Instructions Sought for Court on Thursday

Hi Scott,

Writing to advise that I appeared on this matter this morning. Andy Fitzgerald appeared for the OIPC and s. 40 (1) did not appear.

I advised the Memorial is prepared to release the contract and comply with the OIPC recommendation. Andy asked for leave to file a consent order to resolve the matter and Justice Ryan granted leave.

Please let us know if you have any questions or would like to discuss further.

Best regards,
 Josh

Josh Merrigan
 Associate
 Stewart McKelvey

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: Worsfold, Scott
To: "Josh Merrigan"; Koren Thomson; Noseworthy, Maggie
Cc: Joanne Taylor
Subject: RE: Dr. Xu Contract - Instructions Sought for Court on Thursday
Date: Tuesday, February 17, 2026 4:45:00 PM
Attachments: image002.png

Thanks Josh.

[REDACTED] s. 30 (1)(a)

Scott



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From: Josh Merrigan <jmerrigan@stewartmckelvey.com>
Sent: Monday, February 16, 2026 2:25 PM
To: Worsfold, Scott <dsworsfold@mun.ca>; Koren Thomson <kthomson@stewartmckelvey.com>; Noseworthy, Maggie <maggie.noseworthy@mun.ca>
Cc: Joanne Taylor <jmtaylor@stewartmckelvey.com>
Subject: RE: Dr. Xu Contract - Instructions Sought for Court on Thursday

Hi Scott,

s. 30 (1)(a)

Apologies for the delay, [REDACTED]

Thanks,
 Josh

Josh Merrigan
 Associate
 Stewart McKelvey
 D: 709.570.8820

From: Worsfold, Scott <dsworsfold@mun.ca>
Sent: Friday, February 13, 2026 10:47 AM
To: Josh Merrigan <jmerrigan@stewartmckelvey.com>; Koren Thomson <kthomson@stewartmckelvey.com>; Noseworthy, Maggie <maggie.noseworthy@mun.ca>

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

2025 01G 2260

IN THE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR
GENERAL DIVISION

BETWEEN:

**NEIL BOSE, THE PRESIDENT AND
VICE-CHANCELLOR *PRO TEMPORE* OF MEMORIAL
UNIVERSITY OF NEWFOUNDLAND**

APPLICANT

AND:

**KERRY HATFIELD, in her capacity as
THE INFORMATION AND PRIVACY COMMISSIONER
OF NEWFOUNDLAND & LABRADOR**

FIRST INTERVENOR

AND:

s. 40 (1)

**the Access to Information Requester
And Complainant before the Information and Privacy
Commissioner of Newfoundland & Labrador**

SECOND INTERVENOR

CONSENT ORDER

BEFORE THE HONOURABLE JUSTICE RYAN:

UPON IT APPEARING THAT the Applicant Neil Bose, The President And Vice-Chancellor Pro Tempore of Memorial University of Newfoundland, has filed an Originating Application (*Ex Parte*) pursuant to section 50(2)(b) of the *Access to Information and Protection of Privacy Act, 2015*, S.N.L. 2015 c. A-1.2 seeking a declaration that the Applicant is not required to comply with the recommendations of the Information and Privacy Commissioner of Newfoundland and Labrador in Report A-2024-053;

AND UPON HEARING Josh Merrigan appearing as counsel for the Applicant; and Andrew A. Fitzgerald, K.C., counsel for the First Intervenor;

AND UPON THE CONSENT OF the Applicant and the First Intervenor, the Second Intervenor having failed to appear;

IT IS HEREBY ORDERED THAT:

- 2 -

1. The Originating Application is hereby withdrawn;
2. The Applicant will comply with the recommendation of the Information and Privacy Commissioner of Newfoundland and Labrador in Report A-2024-053; and
3. There shall be no order as to costs.

DATED at St. John's, in the Province of Newfoundland and Labrador, this day of February, 2026.

REGISTRAR

I hereby consent to the filing of this Order.

Andrew A. Fitzgerald, K.C.
Learmonth, Boulos & Fitzgerald
Solicitors for the First Intervenor

- 3 -

I hereby consent to the filing of this Order.

Koren Thomson

Stewart McKelvey

Solicitors for the Applicant

- 4 -

I hereby consent to the filing of this Order.

 s. 40 (1)

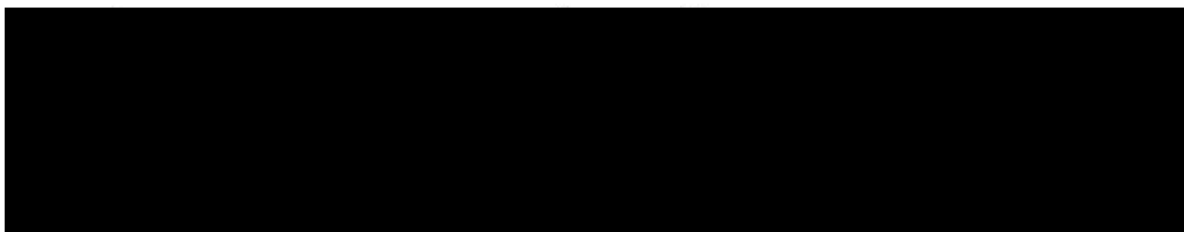
Second Intervenor

From: [Joyce, Mitchell](#)
To: [Worsfold, Scott](#)
Subject: FW: Filed Consent Order - 202501G2260
Date: Wednesday, March 18, 2026 2:56:54 PM
Attachments: [image001.png](#)
[A - ATIPP Request 002-17-384-24.pdf](#)
[R - ATIPP Request 002-17-384-24.pdf](#)

NOTE TO APPLICANT: The attachment has been removed as you have already been provided with a copy by our office on March 20, 2026.

IAP Office

Hi Scott,



s. 30 (1)(a)

FYI – [REDACTED]
please send your email to Maggie as well!

s. 40 (1)

Thanks,

Mitchell

Mitchell Joyce | Access and Privacy Analyst

From: Noseworthy, Maggie <maggie.noseworthy@mun.ca>
Sent: Wednesday, March 18, 2026 1:29 PM
To: Joyce, Mitchell <mjj246@mun.ca>
Subject: RE: Filed Consent Order - 202501G2260

Thanks, Mitchell.



s. 29 (1)(a)

Thanks,
M

Maggie Noseworthy | B.A., LL.B. (she/her)
University Privacy Officer
Office of the General Counsel
Memorial University of Newfoundland
St. John's | Newfoundland and Labrador | A1C 5S7

From: Joyce, Mitchell <mjj246@mun.ca>

Sent: Wednesday, March 18, 2026 10:45 AM
To: Noseworthy, Maggie <maggie.noseworthy@mun.ca>
Subject: RE: Filed Consent Order - 202501G2260

Hi Maggie,

[REDACTED]

s. 29 (1)(a)

The file can be found at the following file path:

[REDACTED]

s. 31 (1)(l)

Let me know what else may be needed in order to proceed.

Thanks,

Mitchell

Mitchell Joyce | Access and Privacy Analyst

From: Noseworthy, Maggie <maggie.noseworthy@mun.ca>
Sent: Friday, March 13, 2026 12:23 PM
To: Joyce, Mitchell <mjj246@mun.ca>
Subject: FW: Filed Consent Order - 202501G2260

Hi Mitchell,

For action and filing.

Thanks,
M

Maggie Noseworthy | B.A., LL.B. (she/her)
University Privacy Officer
Office of the General Counsel
Memorial University of Newfoundland
St. John's | Newfoundland and Labrador | A1C 5S7

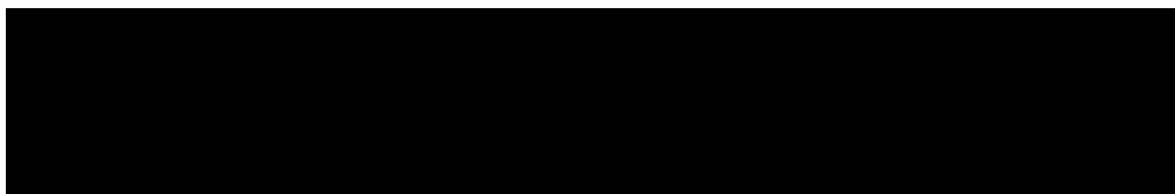
From: Koren Thomson <kthomson@stewartmckelvey.com>
Sent: Friday, March 13, 2026 12:16 PM

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office

From: [Worsfold, Scott](#)
To: [Noseworthy, Maggie](#)
Cc: [Joyce, Mitchell](#)
Subject: RE: Filed Consent Order - 202501G2260
Date: Friday, March 20, 2026 10:48:00 AM
Attachments: [image002.png](#)

Hi Maggie:



s. 30 (1)(a)

Scott



Scott Worsfold, BA, M.Div., LLB
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From: Noseworthy, Maggie <maggie.noseworthy@mun.ca>
Sent: Friday, March 20, 2026 10:05 AM
To: Worsfold, Scott <dsworsfold@mun.ca>
Cc: Joyce, Mitchell <mjj246@mun.ca>
Subject: RE: Filed Consent Order - 202501G2260
Importance: High

Good morning Scott,

s. 40 (1)

I'm finished review of the contract and everything looks to be in order from my perspective as well. I know [REDACTED]

s. 30 (1)(a)

s. 30 (1)(a)

Thanks,
M

Maggie Noseworthy | B.A., LL.B. (she/her)
University Privacy Officer
Office of the General Counsel
Memorial University of Newfoundland
St. John's | Newfoundland and Labrador | A1C 5S7

From: Joyce, Mitchell <mjj246@mun.ca>
Sent: Thursday, March 19, 2026 2:12 PM
To: Noseworthy, Maggie <maggie.noseworthy@mun.ca>
Subject: FW: Filed Consent Order - 202501G2260

Hi Maggie,

See below response from Scott. [REDACTED]

s. 29 (1)(a)

Mitchell

[REDACTED]

Mitchell Joyce | Access and Privacy Analyst

From: Worsfold, Scott <dsworsfold@mun.ca>
Sent: Wednesday, March 18, 2026 4:25 PM
To: Joyce, Mitchell <mjj246@mun.ca>
Subject: RE: Filed Consent Order - 202501G2260

NOTE TO APPLICANT: The remainder of this thread has been removed as it is already found above in the responsive records.

IAP Office