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Memorandum – Reference is added immediately after the text, in parentheses.

“...that it offends the court’s sense of decency” (*Ribbet v Flies of Toronto*, [1995] 2 SCR 1130 at para 196 [Ribbet]).

Factum – Reference is added at the end of the paragraph.

...and exceptionally abusive behavior by an insurance company.

Ribbet v Flies of Toronto, [1995] 2 SCR 1130 at paras 196.

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Chin-Shih Tang



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