group to assimilative pressures (see, for example, *Marchand* v. *The Simcoe County Board of Education*, 1986). This principle has also been elaborated in *Commission des Ecoles Fransaskoises* v. *Government of Saskatchewan* (see above), in which the Saskatchewan Court of Queen's Bench held that comparability of minority and majority language education does not mean that the former must duplicate the latter, but rather that minority language education must be full and complete, and that its overall quality must not be inferior to that of majority language education.

2. *Other Language Rights*

Outside the area of language of education rights, the Court Challenges Program has funded a number of cases with significant effects in the areas of legal rights, legislative bilingualism, the language of work and services, and fundamental rights. In the area of legal rights, the program funded the case of *Forest v. Attorney General of Manitoba* which had been launched in the mid–1970s. Ultimately, the entitlement of Mr. Georges Forest to defend himself in the language of his choice after receiving a uniligual parking ticket was upheld, in part on the grounds that Manitoba's *Official Language Act* of 1890 (which established English uniligualism in the province) was unconstitutional. More recently, in *Mercure* v. *Attorney General of Saskatchewan* (1988), the Supreme Court ruled on similar issues (and upheld the right to plead a case in either official language) in a case testing the validity of the *North–West Territories Act* with respect to language practices in Saskatchewan courts.

In the area of legislative bilingualism, cases have been funded to test practices in various jurisdictions in the light of section 133 of the *Constitution Act, 1867* and the requirement that provincial statutes be printed and published in both official languages. In *St–Jean* v. *The Queen* (1986) the Supreme Court of the Yukon Territory ruled that the Commissioner–in–Council of the Territory could not be considered an institution of the Parliament and Government of Canada and was therefore not subject to bilingualism requirements on this ground. On a related issue, case funding provided by the program has enabled decisions concerning the validity of a mandatorily bilingual statute incorporating a validly enacted unilingual regulation or unilingual document (*Massia* v. *The Queen*, 1987).

While relatively few of the applications received by the program concerned language of work and services issues, a case funded by the program has resulted in the decision that the entitlement to make inquiries in the official language of one's choice at federal government offices (or New Brunswick government offices) implies the right to be heard and understood, and to receive a reply, in the official language of one's choice (*S.A.N.B.*, 1986). Cases sponsored by the program have also spurred important decisions in the area of fundamental rights, such as the recent decision (in *Ford* v. *Attorney General of Québec* 1988) clearly stating that "the freedom to express oneself in the language of one's choice" is included in the