

E. v. Eve [1986] SCC

**Facts:** Mrs. E. asks court to order sterilization of disabled daughter. Court of Application says 'no'.

**Issues/Questions:** Parens Patriae, Best Interest Test  
Involuntary sterilization.

- 1a What is the scope of PP?
- 1b What is the test for using PP?
- 2a Can PP be used for non-therapeutic procedures?
- 2b In the absence of consent can sterilization be therapeutic?

**Holdings:** 1a: unlimited. 1b. BIC of dependent 2a No  
2b No