

From: Deirdre Moore <dw.cceh@outlook.com>
Sent: Friday, May 29, 2020 8:00 PM
To: Law, James (MAG)
Cc: Gonen Snir; MacDougall, Tara; Wade Smith; debora@scholey.ca; lawsociety@lso.ca; Andee Sea Cae Jak; jwhite@pfi.ocks; Third Man Records
Subject: || RE: Re-SENT >No availability in June + a third Motion || RE: family & CYFSA motion
Attachments: Additional judicial officials to be sequestered for my defence

Mr. Law,

Obviously, Mr. Gonen's request should not be heard as a procedural motion. This issue requires a full motion and it may not be accommodated via teleconference. Would you like to understand the reasons why?

In no particular order:

1. As per Family Law Rule 4(13), Mr. Snir should not have served evidence; however, as viewable at <http://pfi.ocks/202005p5-2-002/>, he did. Accordingly, he is guilty of violating section 126(1) of the *Criminal Code* of Canada [Disobeying a Statute](#).
2. As per the [Ministry of the Attorney General](#), the "commissioner's stamp" on the exhibits within Mr. Snir's libelous Affidavit is not remotely credible as a proper stamp: it *excludes* the location (required) and *includes* his name! Accordingly, he is guilty of, among other things, violating section 366(2) [Making a False Document](#). (This conspicuous error also brings into question the credibility of Justice Mark P. Shelston ("Shelston") and Justice Tracy Engelking ("Engelking"); both whom have ignored my evidence and ruled against me in the past. Note that I have named them, as well as Justice Julie Audet ("Audet"), as witnesses for my defence in the my criminal matters (see attached 20200529 18:40 e-mail "Additional judicial officials to be sequestered for my defence").
3. If Mr. Snir wanted to bring a Motion by teleconference, then he should have utilized Family Law Rule 14(8) Motion by Telephone or Video Conference. As evidenced by this e-mail thread, he did not. This can be interpreted as his second count of Disobeying a Statute as well as support for my upcoming allegations that Engelking and Shelston are guilty of, among other things, violating Section 21(1) of the *Criminal Code* of Canada, [Parties to Offense](#).
4. Mr. Snir served and filed two Form 14Bs (Notice of Motion) and two Form 14As (Affidavits); however, these forms are used to support Motions for Temporary Orders under the Family Law Rules. That which Mr. Snir seeks are not Temporary Orders under the Family Law Rules. He is seeking Orders under the Rules of Civil Procedure; specifically, Rule 15.04 (pasted below for your convenience).
5. As per Rules of Civil Procedure's Rule 16—Service of Documents—Mr. Snir's "service" of his ridiculous Motion materials by e-mail was improper: he has essentially claimed that he believes me to be a "mentally incapable person" (see paragraph 15 here: http://pfi.ocks/wp-content/uploads/2020/05/000015KJ_SCJ-FC-15-2446-Kiska-vs-Moore-Affidavit-May-22-2020.pdf). Accordingly, Mr. Snir's only option for service was the engagement of my Power of Attorney for both Health and Property*, Jack White (cc'd on this e-mail via vault@thirdmanrecords.com and jwhite@pfi.ocks).
6. Obviously, I am not a "mentally incapable person"; however, I will not reveal my current address to Mr. Snir. Accordingly, I consent to service by e-mail—assuming Gonen Snir acknowledges his criminal activity and my superior (to his) intellectual capacity as evidenced here: <http://pfi.ocks/to-gonen-snir-002/>.
7. Mr. Law, here is *Courts of Justice Act* Form 37A: [Notice of Motion](#)—perhaps you boys should try again. Teleconference is not an option; plus, I do not currently have a working phone and do not intend to get one until I re-install a land-line phone when I return to Ottawa in July; safely reunited with my two children, Sean and Cate.

Do let me know the dates and times of our three, upcoming, post-July 4, 2020 Motions.

Thank you

Andeé Sea Cae Jak

*of which he has been well aware for months.

(for your convenience)

Family Law Rules | | RULE 4: REPRESENTATION

LAWYER'S REMOVAL FROM THE CASE

(12) A lawyer may make a motion for an order to be removed from the case, with notice to the client and to,

(a) the Children's Lawyer, if the client is a child;

(b) the Public Guardian and Trustee, if the client is or appears to be mentally incapable in respect of an issue in the case. O. Reg. 114/99, r. 4 (12).

NOTICE OF MOTION TO REMOVE LAWYER

(13) Notice of a motion to remove a lawyer shall also be served on the other parties to the case, but the evidence in support of the motion shall not be served on them, shall not be put into the continuing record and shall not be kept in the court file after the motion is heard. O. Reg. 114/99, r. 4 (13).

AFFIDAVIT IN SUPPORT OF MOTION TO REMOVE LAWYER

(14) The affidavit in support of the motion shall indicate what stage the case is at, the next event in the case and any scheduled dates. O. Reg. 114/99, r. 4 (14).

Family Law Rules | | RULE 14: MOTIONS FOR TEMPORARY ORDERS

MOTION BY TELEPHONE OR VIDEO CONFERENCE

(8) A party who wants a motion to be heard by telephone or video conference shall,

(a) obtain an appointment from the clerk for the hearing of the motion;

(b) make the necessary arrangements;

(c) serve a notice of the appointment and arrangements on all other parties, and file it; and

(d) participate in the motion as the notice specifies. O. Reg. 114/99, r. 14 (8).

Rules of Civil Procedure | | RULE 15: REPRESENTATION BY LAWYER

MOTION BY LAWYER FOR REMOVAL AS LAWYER OF RECORD

15.04 (1) A lawyer may move, on notice to his or her client, for an order removing him or her as lawyer of record. O. Reg. 575/07, s. 13 (1).

Notice to Other Parties

(1.1) A motion under subrule (1) shall also be on notice to every other party, but a motion record need not be served on a party who is not the client. O. Reg. 537/18, s. 3 (1).

Requirements Respecting Privileged, Prejudicial Information

(1.2) The lawyer making the motion shall ensure that any information contained in the notice of motion or in the motion record that is subject to solicitor-client privilege or that could, if it were disclosed to another person, be prejudicial to the client, including the grounds for the motion, is redacted or omitted from the notice of motion and from the motion record before,

(a) serving the notice of motion or, if applicable, motion record on a party other than the client; or

(b) filing the notice of motion or motion record. O. Reg. 537/18, s. 3 (1).

(1.3) The lawyer shall provide to the presiding judge or officer at the hearing the complete and unredacted versions of the notice of motion and motion record, which shall be returned by the judge or officer to the lawyer after the hearing and shall not form part of the court file. O. Reg. 537/18, s. 3 (1).

Service on Client

(2) Service on the client of the notice of motion, of the motion record and of any order removing the lawyer from the record shall be made,

(a) personally or by an alternative to personal service under rule 16.03; or

(b) by mailing a copy to the client at,

(i) the client's last known address, and

(ii) another address, if any, where the lawyer believes the copy is likely to come to the client's attention. O. Reg. 42/05, s. 2 (1); O. Reg. 575/07, s. 1; O. Reg. 537/18, s. 3 (2).

Rules of Civil Procedure | | RULE 16: SERVICE OF DOCUMENTS

PERSONAL SERVICE

16.02 (1) Where a document is to be served personally, the service shall be made,

Individual

(a) on an individual, other than a person under disability, by leaving a copy of the document with the individual;

Mentally Incapable Person

(k) on a mentally incapable person,

(i) if there is a guardian or an attorney acting under a validated power of attorney for personal care with authority to act in the proceeding, by leaving a copy of the document with the guardian or attorney,

(ii) if there is no guardian or attorney acting under a validated power of attorney for personal care with authority to act in the proceeding but there is an attorney under a power of attorney with authority to act in the proceeding, by leaving a copy of the document with the attorney and leaving an additional copy with the person,

(iii) if there is neither a guardian nor an attorney with authority to act in the proceeding, by leaving a copy of the document bearing the person's name and address with the Public Guardian and Trustee and leaving an additional copy with the person;

From: Law, James (MAG) <James.Law@ontario.ca>

Sent: Friday, May 29, 2020 4:21 PM

To: Deirdre Moore <dw.cceh@outlook.com>

Cc: Gonen Snir <gonen@snirlaw.com>; MacDougall, Tara <Tara.MacDougall@casott.on.ca>; Wade Smith <WSmith@bellbaker.com>; debora@scholey.ca; Andee Sea Cae Jak <asc.jak@pfi.ROCKS>; jwhite@pfi.rocks

Subject: RE: Re-SENT >No availability in June + a third Motion | | RE: family & CYFSA motion

Good afternoon,

Mr. Snir's procedural motion materials in the family matter were sent to the family office, in turn they forwarded to Justice Shelston for review.

Justice Shelston instructed to set a date.

Mr. Snir's procedural motion materials in the CYFSA matter were sent to our office, in turn I forwarded them to both Justice Engelking and Justice Shelston who both instructed that I schedule them on the same date one after the other. I am now canvassing everyone's availability for the motion.

This motion would be via teleconference, as physical courts are still suspended.

Are you available for this motion via telephone on June 9th or 11th?

Thank you,

James Law

SCJ Assistant Trial Coordinator
161 Elgin Street Ottawa, Ontario
5th Floor – Room 5300
K2P 2K1
T: 613-239-1301
F: 613-239-1324

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From: Deirdre Moore <dw.cceh@outlook.com>

Sent: May 29, 2020 3:53 PM

To: Law, James (MAG) <James.Law@ontario.ca>

Cc: Gonen Snir <gonen@snirlaw.com>; MacDougall, Tara <Tara.MacDougall@casott.on.ca>; Wade Smith <WSmith@bellbaker.com>; debora@scholey.ca; Andee Sea Cae Jak <asc.jak@pfi.ROCKS>; jwhite@pfi.rocks

Subject: Re-SENT >No availability in June + a third Motion || RE: family & CYFSA motion

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Good afternoon Mr. Law,

As per my 20200527 14:33 e-mail on which you were cc'd (attached for your convenience), I am not available until July 4, 2020. How was Mr. Snir able to file motion materials without first canvassing my availability and securing a Motion date?

And  

PS. Please schedule a third time slot for a Motion where I will request that the Family matter and the CYFSA matter be consolidated with my upcoming civil actions against Mr. Snir, Mr. Smith, Ms. MacDougall, Ms. Scholey, The Honourable Julie Audet, The Honourable Tracy Engelking (and others): combined and heard as one, as permitted under *Courts of Justice Act* Section 21.9.

And   Sea Cae Jak, BBA (formerly Deirdre Ann Moore)

President, SAQOTU Inc. II President, AdvisorOnTrack Inc.

Making Change Happen! at pfi.rocks!

Coming Soon: a fully functional website with resources and support for victims

From: Law, James (MAG) <James.Law@ontario.ca>

Sent: Friday, May 29, 2020 3:15 PM

To: Gonen Snir <gonen@snirlaw.com>; Deirdre Moore <dw.cceh@outlook.com> <dw.cceh@outlook.com>; MacDougall, Tara <Tara.MacDougall@casott.on.ca>; Wade Smith <WSmith@bellbaker.com>

Subject: re: family & CYFSA motion

Good afternoon,

Mr. Snir has filed motion material to be removed as counsel on both the Family matter and the CAS matter. I would like to schedule both matters on the same day, one after the other. Please advise if you are available June 4th or 5th for this motion.

Thank you,

James Law

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