ONTARIO CV-23-00061854-0000

SUPERIOR COURT OF JUSTICE

B E T W E E N:

Deirdre Moore *plaintiff*

and

Galarneau and Associates Professional Corporation *defendant*

STATEMENT OF CLAIM

TO THE DEFENDANT

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a statement of defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the plaintiff's lawyer or, where the plaintiff does not have a lawyer, serve it on the plaintiff, and file it, with proof of service in this court office, WITHIN TWENTY DAYS after this statement of claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a statement of defence, you may serve and file a notice of intent to defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your statement of defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

IF YOU PAY THE PLAINTIFF'S CLAIM, and $1,000.00 for costs, within the time for serving and filing your statement of defence you may move to have this proceeding dismissed by the court. If you believe the amount claimed for costs is excessive, you may pay the plaintiff's claim and $400 for costs and have the costs assessed by the court.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commenced unless otherwise ordered by the court.

Date November 7, 2023 Issued by .....

Local registrar

Address of Court Office SUPERIOR COURT OF JUSTICE
59 Church Street
St. Catharines ON L2R 7N8
905-988-6200

TO Galarneau and Associates Professional Corporation, 204-260 Centrum Blvd., Ottawa, Ontario K1E 3P4

CLAIM

1. Plaintiff Deirdre Moore ("Andeé"), claims against the Defendant ("Galarneau"):

    a. Pecuniary damages in the amount of $1,000,000 due to its:

        i. breach of fiduciary duty, negligence and/or negligent investigation;

        ii. wilfull blindness and/or recklessness; and/or

        iii. intentional infliction of emotional suffering, negligent infliction of emotional suffering and/or assistance in breach of fiduciary duty

    of Andeé's children, Sean Charles Kiska and Cate Stella Kiska ("Sean & Cate");

    b. Pecuniary damages in the amount of $1,000,000 (less any amount awarded as damages described at para. 1 a)) due to its:

        i. defamation, negligence and/or negligent investigation;

        ii. wilfull blindness and/or recklessness;

        iii. intentional infliction of emotional suffering, negligent infliction of emotional suffering; and/or

        iv. assistance in breach of fiduciary duty and/or breach of fiduciary duty

    of Andeé, a devoted mother of two and Ontario taxpayer;

    c. Compensatory damages in the amount of $1,000,000 (less any amount awarded as damages described at para. 1 a) and b)) for:

        i. breach of fiduciary duty, assistance in breach of fiduciary dute, negligence, negligent investigation, wilfull blindness and/or recklessness;

        ii. complicity to obstruction of justice, torture, trafficking in persons and/or terrorist activities and/or

iii. abuse of taxpayer-funded status and/or public service agency enabled, promoted and/or funded by the Province of Ontario;

d. Special damages in an amount to be determined with particulars provided prior to trial;

e. Pre- and post-judgement interest pursuant to ss. 128 and 129 of the Courts of Justice Act ("*CJA*"), R.S.O. 1990, c. C.43, as amended;

f. Costs of this action on a full indemnity basis; and

g. Such further and other relief as this Honourable Court deems just.

2. The manner in which Galarneau has de-frauded the Province of Ontario while participating in and/or enabling the ongoing terrorization of Andeé and abuse of her children is similar to that which is described at paras. 130-146 of CV-23-00061855-0000.

November 7, 2023

Deirdre Moore, c/o YWCA Women's Shelter

6135 Culp Street, Niagara Falls, ON L2G 2B6

(613) 848-6832 dmoore@pfi.rocks

Court File No. CV-23-00061854-0000

DEIRDRE MOORE vs. GALARNEAU AND ASSOCIATES PROFESSIONAL CORPORATION

DEIRDRE MOORE vs. GALARNEAU AND ASSOCIATES PROFESSIONAL CORPORATION

ONTARIO

SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT 59 CHURCH STREET

ST. CATHARINES, ONTARIO L2R 7N8

STATEMENT OF CLAIM

Plaintiff:
Deirdre Moore c/o 6135 Culp Street, Niagara Falls, ON L2G 2B6
ph (613) 848-6832 || dmoore@pfi.rocks