

## Exhibit B—Request to Amend Answer

This Exhibit ' B ' referred to in the  
 Affidavit of Deirdre Moore.....  
 sworn before me at the City of Ottawa, this pg 1 - 22  
3.....day of August..., 2017..  
Estos  
 A Commissioner for taking affidavits

## Opening Remarks

The Applicant and his legal team ("BellBaker") have gone to a great deal of effort and significant expense in order to prevent me from amending my Answer; and for good reason. The results of the Form 22: Request to Admit (see Exhibit H) that was served on July 28, 2017 will bring to light exactly why Moore's Answer amendment is justified.

## History of Events

(As e-mail threads are best followed using reverse chronology, this index is an attempt to utilize reverse chronology of e-mail indexing.)

07-Mar-17	Moore canvasses BellBaker availability for procedural motion to amend Answer as directed by FLIC	.... B22
7-Mar-17	BellBaker advises Moore that proper method is to submit draft to them and request consent. (opposite of FLIC direction)	..... B22
07-Mar-17	Moore disregards BellBaker "advice" Moore and continues to bring procedural motion to amend Answer.	..... B21

**Motion not granted as Moore incorrectly asked to insert evidence when she should have asked for permission to revise history of facts and revise claims.**

20-Mar17	BellBaker reinforces that Answer is just an outline of position without evidence.	..... B20
28-Mar-17	BellBaker recognizes that Moore's amended Answer is "almost [an] entirely different pleading and directs Moore to Rule 11(4).	..... B18
28-Mar-17	Moore asks BellBaker "To clarify, Mr. Smith, are you stating that you will not consent to an amended Answer that I am about to serve to you?	..... B17
24-May-17	BellBaker states "Once you have served us with the finalized Amended Answer we'll send you the consent.	..... B16
16-Jun-17	Moore asks BellBaker "Do you think the consent will be ready for pick-up today?	..... B14
	- No reply	
19-Jun-17	Moore asks BellBaker "... any word on the consent to my Amended Answer."	..... B13
	- No reply	
13-Jun-17	BellBaker states "Please serve us with your final draft, and then we will be able to give you consent."	..... B11

**Note that finalizing Amended Answer is challenging as OPS and CAS reports have yet to arrive!**

20-Jun-17	Moore asks BellBaker "Are you in a position to tell me when this will be ready? BellBaker replies "No, I am not. Mr. Smith is currently out of the office."	..... B11
29-Jun-17	BellBaker states "I understand that you are anxious for updates on Consent, however, I'm not in a position to give you any news.	..... B5
05-Jul-17	Moore states to BellBaker "... do you plan to provide consent? Prepping to serve a procedural motion won't take me long and I'll likely serve it tomorrow.	..... B4
5-Jul-17	BellBaker states "This is NOT a procedural motion. The motion will be opposed. Argument will take about 1 hour. Case law will be presented.	..... B3

## Deirdre Moore

---

**From:** Deirdre Moore <deirdre@cceh.ca>  
**Sent:** Friday, July 7, 2017 9:57 AM  
**Cc:** 'Wade Smith'  
'Christine Hammond'  
**Subject:** RE: PS>Fwd: Consent to Amended Answer

Mr. Smith,

Our recollections of the Settlement Conference are quite different: \*

- Her Honour said that she was familiar with the Lo case and then she went on to say that you were not in a position to accept/reject any Order.
- Her Honour absolutely did not opine that I would not be successful.
- My Orders do not seek compensation for the cause of mental breakdowns
- You have no knowledge of the evidence that I have as I have not presented any yet.

We haven't even touched on the perjury side of things yet. It would be foolish for you to assume that I have no evidence there either.

Obviously, we will not be mediating all matters; though, I have already provided you with a detailed offer to settle the division of assets.

I have done my best. You are retracting your repeated statement that you would provide consent, despite your encouragement for me to simply seek your consent in the first place.

Furthermore, I have already informed you that retaining counsel is not an option for me: you already know that I am forced to a regular motion to request interim financial support.

Thank you for your clarification that I have no choice but to proceed with yet another procedural motion (Amended Answer) as well as a regular motion (Interim Support).

Deirdre Moore

---

**From:** Wade Smith [mailto:WSmith@bellbaker.com]  
**Sent:** Thursday, July 6, 2017 8:05 AM  
**To:** Deirdre Moore <Deirdre@cceh.ca>  
**Cc:** John Kiska (jonathankiska@gmail.com) <jonathankiska@gmail.com>  
**Subject:** RE: PS>Fwd: Consent to Amended Answer

Justice Trousdale admitted that the motion in Lo (to amend pleadings) was not allowed because there is no cause of action. If you proceed with a motion, it will be opposed and costs will be sought against you.

Her Honour also opined that, on the facts, you will not succeed anyway. Mr. Kiska didn't cause you to have breakdowns. You have no evidence supporting this.

I strongly encourage you to retain counsel. Regardless, we should mediate all issues.

Wade L. Smith  
Bell Baker LLP  
116 Lisgar Street  
Ottawa, Ontario  
K2P 0C2  
613-237-3448 (324)

\* Moore is currently in the process of writing to Justice Trousdale regarding permission to have minutes transcribed. JM

**From:** Deirdre Moore [<mailto:Deirdre@cceh.ca>]  
**Sent:** July-06-17 8:42 AM  
**To:** Wade Smith  
**Cc:** Christine Hammond  
**Subject:** PS>Fwd: Consent to Amended Answer

Please also keep in mind that I only discovered CAS file once I received box of materials from previous lawyer + only discovered Kiska comments to OPS last week (after a FOUR month delay) + there is plenty of case law that supports the reasonableness of my Orders.

Your are wasting Court resources by refusing consent as previously advised many, many, many times.

Please confirm your belief that you require a regular motion.

Thank you.

Sent from my iPhone

Begin forwarded message:

**From:** Deirdre Moore <[Deirdre@cceh.ca](mailto:Deirdre@cceh.ca)>  
**Date:** July 6, 2017 at 7:25:29 AM EDT  
**To:** Wade Smith <[WSmith@bellbaker.com](mailto:WSmith@bellbaker.com)>  
**Cc:** [chammond@bellbaker.com](mailto:chammond@bellbaker.com)  
**Subject:** Re: Consent to Amended Answer

FLIC says it's a procedural motion. As I already reminded you, the Judge at the Settlement Conference stated that you were not in a position to deny any Order. You are ignoring the Court's direction and case law need not be presented. I have already started the process of receiving a copy of those minutes.

You are, again, wasting your client's resources in pursuing this stalling technique in the hopes that my Orders will be denied due to the statute of limitations.

I will be sure to tick off the "opposed" box.

Sent from my iPhone

On Jul 5, 2017, at 3:17 PM, Wade Smith <[WSmith@bellbaker.com](mailto:WSmith@bellbaker.com)> wrote:

This is NOT a procedural motion. The motion will be opposed. Argument will take about 1 hour. Case law will be presented.

Wade L. Smith  
Bell Baker LLP  
700-116 Lisgar Street  
Ottawa, Ontario  
K2P 0C2  
613-237-3448 (324)

-----Original Message-----

From: Deirdre Moore [mailto:Deirdre@cceh.ca]

Sent: July-05-17 3:08 PM

To: Wade Smith

Cc: Christine Hammond

Subject: Consent to Amended Answer

Mr. Smith,

I have been waiting for this for a while. I am at the Courthouse and they suggest, again, that I file a procedural motion.

Do you feel that this is proper this time? Or do you plan to provide your consent? Prepping to serve a procedural motion won't take me long and I'll likely serve it tomorrow.

Looking forward to your prompt reply.

Sincerely,

Deirdre Moore

ps. Do you realize that your client's Settlement Brief claimed that he was paying me \$15,000/month and that I was refusing to look for work? Are you at all concerned about the mental health of your client?

Sent from my iPhone

## Deirdre Moore

---

**From:** Deirdre Moore <deirdre@cceh.ca>  
**Sent:** Thursday, June 29, 2017 2:24 PM  
**:** 'Lauren Daneman'  
**Subject:** RE: Police reports + update on consent?

Hi Lauren.

Thank you for sending the documents.

I appreciate your update on the consent too. I understand ... but I can only wait for so long. I don't have time to look up when I served the amendment, but I have already been waiting for a while. My only option is to continue to move forward on a best-efforts basis and hope that you can appreciate my need to do so.

Thank you.  
Deirdre

-----Original Message-----

**From:** Lauren Daneman [mailto:LDaneman@bellbaker.com]  
**Sent:** Thursday, June 29, 2017 12:30 PM  
**To:** Deirdre Moore <deirdre@cceh.ca>  
**Subject:** RE: Police reports + update on consent?

Hi Deirdre,

I'll courier the package to you- it'll arrive either this afternoon or tomorrow morning, depending whether our courier has already done his pickup today.

I understand that you are anxious for updates on the Consent, however, I'm not in a position to give you any news. Mr. Smith is reviewing our position and will be in touch shortly.

- Lauren

-----Original Message-----

**From:** Deirdre Moore [mailto:deirdre@cceh.ca]  
**Sent:** Thursday, June 29, 2017 2:08 PM  
**To:** Lauren Daneman <LDaneman@bellbaker.com>  
**Subject:** RE: Police reports + update on consent?

Hi Lauren.

I haven't received anything in any of my outlook folders. Is it easier to courier for this afternoon? Whatever is easier for you is fine by me.

Any news on the Amended Answer consent?

In anticipation of working soon (hopefully), I'd like to do as much divorce work as I can over this long weekend before kids are finished school.

Thank you.  
Deirdre

-----Original Message-----

From: Lauren Daneman [mailto:LDaneman@bellbaker.com]  
Sent: Thursday, June 29, 2017 11:51 AM  
To: Deirdre Moore <Deirdre@cceh.ca>  
Subject: RE: Police reports

 Deirdre,

The email may have come through under a sender "scanner" at about 11am.  
I sent you the reports direct from the scanner, as the document was too large to go via this email. Can you check your junk folder or inbox and see if the reports are under "scanner" as sender?

If not, I will rescan and send as a number of files (there are roughly 400 pages).


-----Original Message-----

From: Deirdre Moore [mailto:Deirdre@cceh.ca]  
Sent: Thursday, June 29, 2017 12:53 PM  
To: Lauren Daneman <LDaneman@bellbaker.com>  
Subject: Re: Police reports

Still nothing.  
Feel free to scan and send along any time.  
Thank you. Deirdre.

Sent from my iPhone

> On Jun 29, 2017, at 11:15 AM, Lauren Daneman <LDaneman@bellbaker.com>  
wrote:

>  Deirdre,  
> Please confirm when you have received the reports

>  
> -----Original Message-----

> From: Deirdre Moore [mailto:Deirdre@cceh.ca]  
> Sent: Wednesday, June 28, 2017 6:01 PM  
> To: Lauren Daneman <LDaneman@bellbaker.com>  
> Subject: Police reports

>  
> Hi Lauren.

>  
> I am thinking that it is a pretty good idea for you to forward to me a  
copy of those police reports.

>  
> Thanks so much.  
> Deirdre

>  
> Sent from my iPhone

## Deirdre Moore

---

**From:** Deirdre Moore <Deirdre@cceh.ca>  
**Sent:** Tuesday, June 27, 2017 4:07 PM  
**To:** Wade Smith  
**Cc:** Lauren Daneman  
**Subject:** My Amended Answer Process

Dear Mr. Smith.

I think my process was as proper as possible:

1. Ask if Kiska will be amending bogus emergency custody order aka application: no
2. Ask FLIC if I need to request Court permission given massive changes due to new info available and time/resources to process: yes
3. Procedural Motion to get permission: don't need it, just get consent.
4. Provide Bell, Baker with lots of head's ups that big changes are coming ... but holding out for those (intentionally?) delayed police/CAS reports.
5. Bell, Baker confirms it will provide consent many times.
6. Amended Answer submitted.
7. Day before Settlement Conference, consent withheld based on one piece of case law that may or may not be current.

Are you now suggesting that I need the Court's permission to amend? If so, please let me know so I can re-date, re-print, re-serve and re-file all of those forms while I am there tomorrow.

Thank you.  
Deirdre

Ps. I find it particularly odd that this one claim has been singled out.  
Pps. It will be shown that Kiska satisfies all 3 criteria required.

Sent from my iPhone

## Deirdre Moore

---

**From:** Deirdre Moore <Deirdre@cceh.ca>  
**Sent:** Tuesday, June 27, 2017 2:51 PM  
**To:** Wade Smith  
**Cc:** John Kiska (jonathankiska@gmail.com); Lauren Daneman  
**Subject:** Re: WestlawNext Canada - Lo v. Lo

If my former "legal representation" had actually read the file, the original answer wouldn't have needed an amendment ... or your consent.

Alas, that is not my situation. My situation is the POLAR opposite.

Sent from my iPhone

> On Jun 27, 2017, at 3:16 PM, Wade Smith <WSmith@bellbaker.com> wrote:

>  
> I can't consent to an amendment which claims these types of damages. Please read the Lo case.  
>  
> Wade L. Smith  
> Bell Baker LLP  
> 700-116 Lisgar Street  
> Ottawa, Ontario  
> K2P 0C2  
> 613-237-3448 (324)

> -----Original Message-----

> From: Deirdre Moore [mailto:Deirdre@cceh.ca]  
> Sent: June-27-17 3:11 PM  
> To: Wade Smith  
> Cc: John Kiska (jonathankiska@gmail.com); Lauren Daneman  
> Subject: Re: WestlawNext Canada - Lo v. Lo

> Ps. I don't recall there being a qualifier on your consent. Are you refusing to provide consent?

> Sent from my iPhone

>> On Jun 27, 2017, at 2:38 PM, Wade Smith <WSmith@bellbaker.com> wrote:

>>  
>> Good afternoon Ms. Moore

>> One of the problems with your latest amended Answer is that you claim damages for the intentional infliction of mental suffering. This claim is not permitted in family law. I am attaching the leading case on this point.

>>  
>> Wade L. Smith  
>> Bell Baker LLP  
>> 700-116 Lisgar Street  
>> Ottawa, Ontario  
>> K2P 0C2  
>> 613-237-3448 (324)

>> -----Original Message-----

>> From: nextcanada@westlaw.com [mailto:nextcanada@westlaw.com]



>> Sent: June-27-17 2:38 PM

>> To: Wade Smith

>> Subject: WestlawNext Canada - Lo v. Lo

>>

>> Wade Smith sent you content from WestlawNext Canada.

>> Please see the attached file.

>>

>> Item: Lo v. Lo

>> Citation: 2009 CarswellOnt 2979

>> Sent On: Tuesday, June 27, 2017

>> Sent By: Wade Smith

>> Client ID: UNITED

>>

>> Note:

>>

>>

>> -----

>> -

>> -----

>> -

>> ----- WestlawNext Canada Copyright ©

>> Thomson Reuters Canada Limited or its licensors (excluding individual court documents). All rights reserved.

>> <Lo v Lo.rtf>

>

## Deirdre Moore

---

**From:** Deirdre Moore <deirdre@cceh.ca>  
**Sent:** Wednesday, June 21, 2017 8:45 PM  
'deirdre@cceh.ca'  
**Subject:** FW: Date stamp wrong on email e-mail > FW: Consent for Amended Answer

---

**From:** Deirdre Moore [mailto:deirdre@cceh.ca]  
**Sent:** Wednesday, June 21, 2017 9:30 AM  
**To:** 'Christine Hammond' <CHammond@bellbaker.com>  
**Subject:** Date stamp wrong on email e-mail > FW: Consent for Amended Answer

Sorry Christine. Computer is always resetting date and I forgot to check it this morning. Date stamp should be June 21.

---

**From:** Deirdre Moore [mailto:deirdre@cceh.ca]  
**Sent:** Saturday, June 24, 2017 9:26 AM  
**To:** 'Christine Hammond' <CHammond@bellbaker.com>  
**Subject:** RE: Consent for Amended Answer

Christine.

I just mean that I will serve what I can the best way I can think of. So, one of the attachments to the Brief will be the amended answer that has not received consent and lacks the insight that would have been provided by the police reports had they arrived in time.

I think that is the best that I can do today.  
Deirdre

---

**From:** Christine Hammond [mailto:CHammond@bellbaker.com]  
**Sent:** Wednesday, June 21, 2017 6:33 AM  
**To:** 'Deirdre Moore' <Deirdre@cceh.ca>  
**Subject:** RE: Consent for Amended Answer

What does she mean by a "best efforts basis"?

---

**From:** Deirdre Moore [mailto:Deirdre@cceh.ca]  
**Sent:** Tuesday, June 20, 2017 3:20 PM  
**To:** Christine Hammond  
**Subject:** Re: Consent for Amended Answer

Thanks so much for letting me know.

I will be downtown tomorrow to serve Brief on a best efforts basis. If anything changes, please let me know.

Deirdre

Sent from my iPhone

Jun 20, 2017, at 12:59 PM, Christine Hammond <CHammond@bellbaker.com> wrote:

Hello Ms. Moore:

No, I am not. Mr. Smith is currently out of the office.

Yours truly,

**BELL BAKER LLP**

*Christine Hammond,*

Christine Hammond, Assistant to  
**Wade L. Smith**  
Telephone: 613-237-3444 (extension 308)  
Facsimile: 613-237-1413

This message may contain confidential information. Any right of privilege which may exist has not been waived

---

**From:** Deirdre Moore [<mailto:deirdre@cceh.ca>]  
**Sent:** Tuesday, June 20, 2017 1:47 PM  
**To:** Christine Hammond  
**Cc:** Wade Smith; Lauren Daneman  
**Subject:** Consent for Amended Answer

Hi Christine.  
Are you in a position to tell me when this will be ready?  
Thank you.  
Deirdre

---

**From:** Lauren Daneman [<mailto:LDaneman@bellbaker.com>]  
**Sent:** Tuesday, June 13, 2017 9:30 AM  
**To:** Deirdre Moore <[deirdre@cceh.ca](mailto:deirdre@cceh.ca)>  
**Subject:** Re: Amended Answer attached

Good morning Deirdre,

We need the final version of the amended answer in order to consent to having it filed.  
Please serve us with your final draft, and then we will be able to give you consent.  
Thanks,

Lauren

Sent from my iPhone

On Jun 13, 2017, at 10:13 AM, Deirdre Moore <[deirdre@cceh.ca](mailto:deirdre@cceh.ca)> wrote:

Hi Lauren.  
I have to draw the line somewhere and get this to you.  
As the CAS reports and police reports have yet to arrive, I suspect I will add more; but, this covers the basic answer.  
I will gather as many supporting documents as I can and serve paper copy as soon as possible.

Is this good enough for you/Wade to provide consent?

Thank you.

Deirdre.

<01\_02 Amended Answer 6.0 20170613.docx>

## Deirdre Moore

---

**From:** Deirdre Moore <deirdre@cceh.ca>  
**Sent:** Monday, June 19, 2017 11:14 AM  
**Subject:** 'Christine Hammond'  
**Attachments:** FW: 00\_00 Form 17C Conference Notice - Service of  
RE: Settlement Conference; 00\_00 17C Conference Notice.pdf

Hi Christine.

I understand that Lauren is away so thought I would forward this to you.

Also, any word on the consent to my Amended Answer. If it were ready I could file it all today.

Thank so much.

Deirdre.

---

**From:** Deirdre Moore [mailto:deirdre@cceh.ca]  
**Sent:** Monday, June 19, 2017 10:50 AM  
**To:** 'Lauren Daneman' <LDaneman@bellbaker.com>  
**Subject:** 00\_00 Form 17C Conference Notice - Service of

Hi Lauren.

I think I forgot to serve and file the 17C (attached): it does not appear in the Continuing Record.

I will take care of this today.

Thank you.

Deirdre

## Deirdre Moore

---

**From:** Deirdre Moore <Deirdre@cceh.ca>  
**Sent:** Friday, June 16, 2017 9:01 AM  
**Subject:** Consent - too soon to ask?

Hi Lauren.

I have no idea what the turnaround time on the consent for the Amended Answer (served yesterday) will be but I thought I would ask. I am downtown this morning and hope to drop by the courthouse to find out about un-serving the 35.1.

Do you think the consent will be ready for pick-up today?

Thank you.  
Deirdre

Sent from my iPhone

## Deirdre Moore

---

**From:** Deirdre Moore <deirdre@cceh.ca>  
**Sent:** Tuesday, June 13, 2017 12:29 PM  
**Cc:** 'Lauren Daneman'  
**Subject:** 'deirdre@cceh.ca'  
Defamation Lawsuit no longer being pursued

Hi Lauren.

After becoming a bit more familiar with the damages available in Family Law, I no longer believe that a separate defamation lawsuit will be necessary.

Deirdre

## Deirdre Moore

---

**From:** Deirdre Moore <deirdre@cceh.ca>  
**Sent:** Wednesday, May 24, 2017 10:22 AM  
**Subject:** RE: Technical errors on Amended Answer

Ok. Thank you for letting me know.

-----Original Message-----

From: Lauren Daneman [mailto:LDaneman@bellbaker.com]  
Sent: Wednesday, May 24, 2017 7:32 AM  
To: Deirdre Moore <Deirdre@cceh.ca>  
Subject: RE: Technical errors

Good morning Deirdre,

That's fine. Once you have served us with the finalized Amended Answer we'll send you the consent

- Lauren

-----Original Message-----

From: Deirdre Moore [mailto:Deirdre@cceh.ca]  
Sent: Tuesday, May 23, 2017 2:07 PM  
To: Lauren Daneman <LDaneman@bellbaker.com>  
Subject: Technical errors

Hi Lauren.

I have been told that I made some technical errors on the Amended Answer and the 13.1. I will correct these asap. They also said that I require Mr. Smith's written consent in order to file my Amended Answer. If you could provide that consent at your convenience, then I could complete the filing portion of this step.

Thank you.  
Deirdre.

Sent from my iPhone



## Deirdre Moore

---

**From:** Deirdre Moore <deirdre@cceh.ca>  
**Sent:** Wednesday, March 29, 2017 6:35 AM  
**Subject:** 'Wade Smith'  
FW: Amended Answer & Consent > Re-scheduling of Settlement Conference

My apologies Mr. Smith. I believe that I misinterpreted your previous e-mail.

I now realize that the "My schedule is full and I cannot agree to any changes" referred to my request to move up the Settlement Conference date—which will provide no results and serve no purpose other than to delay the trial date.

Please do let me know if you change your mind as I find this entire experience to be very stressful.

Deirdre Moore

---

**From:** Deirdre Moore [mailto:Deirdre@cceh.ca]  
**Sent:** Tuesday, March 28, 2017 1:07 PM  
**To:** Wade Smith <WSmith@bellbaker.com>  
**Subject:** Re: Amended Answer & Consent

To clarify, Mr. Smith, are you stating that you will not consent to an amended Answer that I am about to serve to you?

Sent from my iPhone

 Mar 28, 2017, at 10:49 AM, Wade Smith <WSmith@bellbaker.com> wrote:

Please provide your current cv and applications for employment. There is no reason for you not to be earning income and contributing to the support of your children.

My schedule is full and I cannot agree to any changes.

Wade L. Smith  
Bell Baker LLP  
700-116 Lisgar Street  
Ottawa, Ontario  
K2P 0C2  
613-237-3448 (324)

---

**From:** Deirdre Moore [mailto:Deirdre@cceh.ca]  
**Sent:** March-28-17 10:48 AM  
**To:** Wade Smith  
**Subject:** Re: Amended Answer PS

Mr. Smith,

As directed by both you and the Court, all evidence should be held back and presented at the trial, not in advance. You can let your client know that my current income is zero.

 Speaking of trials, are you agreeable to moving up the Settlement Conference date as requested? That way the trial date can be set a little sooner.

Thank you

Deirdre.

Sent from my iPhone

On Mar 28, 2017, at 9:57 AM, Wade Smith <[WSmith@bellbaker.com](mailto:WSmith@bellbaker.com)> wrote:

Good morning

This is not an amended Answer. It is an almost entirely different pleading.

To amend, you do not discard what is in the existing Answer. What you do is underline any additions or changes to the existing document. Please look at Rule 11(4).

As regards support, Mr. Kiska has paid on a without prejudice basis and will continue to do so.

Please provide me with a copy of your updated resume, applications for employment and responses thereto.

Wade L. Smith  
Bell Baker LLP  
700-116 Lisgar Street  
Ottawa, Ontario  
K2P 0C2  
613-237-3448 (324)

---

**From:** Deirdre Moore [<mailto:deirdre@cceh.ca>]

**Sent:** March-27-17 11:29 AM

**To:** Wade Smith

**Subject:** FW: Amended Answer

Dear Mr. Wade Smith,

Please find attached my amended Answer to your client's Application with all changes underlined and highlighted in yellow. (Please note that much has been simply deleted as I deemed it to be relatively unimportant.) I will serve to you and file a signed copy as soon as possible and look forward to receipt of your consent for filing.

Also, would you please let me know when you think you might have your client's updated 13.1 Financials available? I would like to review the document prior to finalizing my updated 13.1.

Finally, as it is fairly evident that the Settlement Conference will not lead to any meaningful results (see previous e-mail attached for your convenience), are you agreeable to my request for an earlier date should one become available? Waiting three months for a procedure that will likely provide no results and then several additional months for each of the following steps prior to trial will produce financial hardship and severely impact my ability to ensure the well-being and safety of my children and me.

Very sincerely,

Deirdre Moore, CFA, BBA

---

**From:** Deirdre Moore [<mailto:Deirdre@cceh.ca>]

**Sent:** Monday, March 20, 2017 1:19 PM

**To:** Wade Smith <[WSmith@bellbaker.com](mailto:WSmith@bellbaker.com)>

**Cc:** John Kiska ([jonathankiska@gmail.com](mailto:jonathankiska@gmail.com)) <[jonathankiska@gmail.com](mailto:jonathankiska@gmail.com)>

**Subject:** Re: Amended Answer

Thank you.

I will ensure that there is absolutely no evidence in my amended Answer.

Sent from my iPhone

On Mar 20, 2017, at 8:35 AM, Wade Smith <[WSmith@bellbaker.com](mailto:WSmith@bellbaker.com)> wrote:

The Answer is just an outline of your position. You need not (and should not) plead evidence in the Answer. I (again) suggest that you retain counsel. I don't believe that you need to amend your Answer.

Wade L. Smith  
Bell Baker LLP  
700-116 Lisgar Street  
Ottawa, Ontario  
K2P 0C2  
613-237-3448 (324)

---

**From:** Deirdre Moore [<mailto:deirdre@cceh.ca>]

**Sent:** March-19-17 9:16 PM

**To:** Wade Smith

**Subject:** Amended Answer

Mr. Wade,

I am very glad that I took the time to ask the Court for permission to amend my Answer; however, you were right. It was clearly stated that I could amend my Answer without permission. I will forward one to you as soon as possible.

Thanks so much.

Deirdre, CFA, BBA

## Deirdre Moore

---

**From:** Deirdre Moore <Deirdre@cceh.ca>  
**Sent:** Monday, March 20, 2017 1:19 PM  
**Cc:** Wade Smith  
**Subject:** John Kiska (jonathankiska@gmail.com)  
Re: Amended Answer

Thank you.  
I will ensure that there is absolutely no evidence in my amended Answer.

Sent from my iPhone

On Mar 20, 2017, at 8:35 AM, Wade Smith <WSmith@bellbaker.com> wrote:

The Answer is just an outline of your position. You need not (and should not) plead evidence in the Answer. I (again) suggest that you retain counsel. I don't believe that you need to amend your Answer.

Wade L. Smith  
Bell Baker LLP  
700-116 Lisgar Street  
Ottawa, Ontario  
K2P 0C2  
613-237-3448 (324)

---

**From:** Deirdre Moore [<mailto:deirdre@cceh.ca>]  
**Sent:** March-19-17 9:16 PM  
**To:** Wade Smith  
**Subject:** Amended Answer

Mr. Wade,

I am very glad that I took the time to ask the Court for permission to amend my Answer; however, you were right. It was clearly stated that I could amend my Answer without permission. I will forward one to you as soon as possible.

Thanks so much.  
Deirdre, CFA, BBA

## Deirdre Moore

---

**From:** Wade Smith <WSmith@bellbaker.com>  
**Sent:** Tuesday, March 7, 2017 3:33 PM  
**To:** Deirdre Moore  
**Cc:** Lauren Daneman; Christine Hammond  
**Subject:** RE: Procedural motion - March 14, 2017 at 10:00

Ms. Moore

Your motion is improper. The proper method is to draft the actual amended Answer, underlining all changes, and asking me to consent to the amended Answer.

You do not go to court seeking permission in advance.

Wade L. Smith  
Bell Baker LLP  
700-116 Lisgar Street  
Ottawa, Ontario  
K2P 0C2  
613-237-3448 (324)

-----Original Message-----

**From:** Deirdre Moore [mailto:Deirdre@cceh.ca]  
**Sent:** March-07-17 2:18 PM  
**To:** Wade Smith  
**Subject:** Procedural motion - March 14, 2017 at 10:00

Mr. Smith,  
Please see attached: revised Form 14B with date.

Thank you.  
Deirdre

## Deirdre Moore

---

**From:** Wade Smith <WSmith@bellbaker.com>  
**Sent:** Tuesday, March 7, 2017 9:54 AM  
**Cc:** Deirdre Moore  
**Subject:** Lauren Daneman; John Kiska (jonathankiska@gmail.com)  
RE: Availability for Motion next Tuesday

These motions usually go on consent. Please send me your Amended pleading together with a draft consent.

Wade L. Smith  
Bell Baker LLP  
700-116 Lisgar Street  
Ottawa, Ontario  
K2P 0C2  
613-237-3448 (324)

---

**From:** Deirdre Moore [mailto:deirdre@cceh.ca]  
**Sent:** March-07-17 8:59 AM  
**To:** Wade Smith  
**Subject:** Availability for Motion next Tuesday

Dear Mr. Smith,

I will be at the Court House today to submit a requisition for motion regarding:

**RULE 11: AMENDING AN APPLICATION, ANSWER OR REPLY**  
**AMENDING APPLICATION OR ANSWER WITH COURT'S PERMISSION**

(3) On motion, the court shall give permission to a party to amend an application, answer or reply, unless the amendment would disadvantage another party in a way for which costs or an adjournment could not compensate. O. Reg. 114/99, r. 11 (3).

The form advises that I am to consult with you to ensure the motion will proceed as scheduled.  
Are you available next Tuesday morning?

Please let me know at your earliest convenience.

Deirdre