

Deirdre Moore

From: Deirdre Moore <Deirdre@cceh.ca>
Sent: Friday, January 27, 2017 4:33 PM
To: Genevieve Lalonde; mblais@vavlawyers.com; Michael Dam
Cc: Deirdre Moore
Subject: Re: Financial issues

Thank you for the help that you have provided. I would like to end our retainer agreement effective immediately. Please provide a final invoice at your earliest convenience.

Deirdre

Sent from my iPhone

On Jan 27, 2017, at 4:10 PM, Genevieve Lalonde <GLalonde@vavlawyers.com> wrote:
A Commissioner for taking affidavits

This Exhibit 'E' referred to in the
Affidavit of Deirdre Moore,
sworn before me at the City of Ottawa, this
18 day of July, 2017.

Deirdre:

You indicated in your voicemail that you wanted to try and address the financial issues with a quick turn-around time. Court dates are scheduling three months from now and likely longer for a Motion because it takes time to prepare the materials (which are also expensive). I simply suggested what I thought would be quickest and most cost-effective.

Yes, you will be charged for the email correspondence as is our policy.

Genevieve Lalonde (B.A. Hons., J.D.)
VICTOR AGES VALLANCE LLP
112 Lisgar Street
Ottawa, ON, K2P 0C2

Phone: 613-238-1333 x232
Fax: 613-238-8949
email: glalonde@vavlawyers.com

From: Deirdre Moore [<mailto:Deirdre@cceh.ca>]
Sent: January-27-17 4:05 PM
To: Genevieve Lalonde
Cc: Michele Blais
Subject: Re: Financial issues

I don't mean to be offensive Genevieve, but did I just pay for that long e-mail that you wrote?

I am suing him for libel and slander, as you know. Mediation???

Sent from my iPhone

On Jan 27, 2017, at 2:31 PM, Genevieve Lalonde <GLalonde@vavlawyers.com> wrote:

Hi Deirdre:

I got your voicemail and I'm just about to go on a call. Have you updated your financial statement like we discussed last week? That is the first step in addressing the financial issues and John needs to update his as well.

Case Conferences in Court are currently scheduling in April. If you are interested in going to mediation on the financial aspects, that could likely be organized sooner. I do not think it would be prudent to bring a Motion on financial/support issues until we know John's position regarding same.

I think we should do a letter to Wade Smith enclosing your updated financial statement, requesting John's, and canvassing dates to return to mediation on support/property issues with the hope of scheduling something as soon as possible. We could also get his position on you taking a shareholder loan you mentioned in your voicemail but I will discuss with Michele as she has more experience dealing with such things. There would have to be some arrangement for paying it back or characterizing it as support or else I believe it would be credited against you in the calculation of property division.

Genevieve Lalonde (B.A. Hons., J.D.)
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From: Tanya Davies [mailto:tdavies@davieslegalfirm.com]

Sent: Sunday, April 9, 2017 10:35 AM

To: Deirdre Moore <deirdre@cceh.ca>; Tanya Davies <tdavies@davieslegalfirm.com>

Subject: RE: Final Statement of Account, refund of unused retainer

That is not my intention whatsoever and it is ridiculous to suggest. I have been extremely busy and a refund of the retainer depends on the dockets and invoices and is not paid back randomly. Overpaid? Have you seen your file? It is a gigantic box of documents. It was time consuming to review. All of this is billable hours. Will calculate the dockets by tomorrow. Fabricated allegations? Have you seen the medical reports? You imply that it is your intention to continue working with me and yet you request a refund. These two things are not compatible. I will however calculate a potential partial refund based on the dockets, not randomly.

Tanya C. Davies

On Apr 9, 2017 8:43 AM, "Deirdre Moore" <deirdre@cceh.ca> wrote:

Hi Tanya,

I have yet to receive anything.

I am looking for your final statement of account and a cheque for the unused retainer that I over-paid in good faith.

As I said on my message to you, I need a strong litigator but need access to my home equity and/or business savings to pay for one. I am in the process of negotiating a shareholder loan for this reason.

I don't think you quite get my story. I have attached a graph that illustrates what this man has done to me. He CREATED a history of mental illness. I have a defamation lawyer, Owen Bourns, and will need a strong divorce lawyer once I get access to funds. I want to try to set precedent with this. I need someone who gets the story and is willing to work WITH me.

If you are not interested, tell me now so that I can start looking for someone else. If you want to stiff me for the excess retainer, that's your choice.

Deirdre