

Deirdre Moore

From: Wade Smith <WSmith@bellbaker.com>
At: Tuesday, March 28, 2017 8:57 AM
To: Deirdre Moore
Cc: John Kiska (jonathankiska@gmail.com)
Subject: RE: Amended Answer

Categories: Red Category

Good morning

This is not an amended Answer. It is an almost entirely different pleading. A Commissioner for taking affidavits

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
K1P 1C2
1-237-3448 (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

This Exhibit 'J' referred to in the
Affidavit of Deirdre Moore,
sworn before me at the City of Ottawa, this
18 day of July, 2017.
Stephen J. [Signature]
A Commissioner for taking affidavits

To: Wade Smith <WSmith@bellbaker.com>

Cc: John Kiska (jonathankiska@gmail.com) <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> 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