

Deirdre Moore

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

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

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 file 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
700-116 Lisgar Street
Ottawa, Ontario
K2P 0C2
613-237-3448 (324)

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>
Date: July 6, 2017 at 7:25:29 AM EDT
To: Wade Smith <WSmith@bellbaker.com>
Cc: 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> 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