

**This is Exhibit "A"
to the Affidavit of
Jonathan William Kiska
sworn before me at Ottawa,
in the Province of Ontario, this 27th
day of July, 2017.**

A handwritten signature in dark ink, consisting of a large, stylized 'J' followed by a horizontal line and a small flourish.

A Commissioner, etc.

Superior Court of Justice Family Court Branch

(Name of court)

at 161 Elgin Street, Ottawa, Ontario K2P 2K1

Court office address

Form 14B: Motion
Form

Names of parties: Deirdre Moore
Jonathan Kiska

Applicant: Jonathan Kiska Respondent: Deirdre Moore

Hearing date: May 16, 2017 10:00
Name of case management judge:

This form is filed by:

☐ applicant ☒ respondent ☐ (Other, specify.)

This motion is made:

☐ with the consent of all persons affected ☐ with notice to all persons affected – unopposed
☒ with notice to all persons affected – opposition expected ☐ without notice

NOTE TO PERSON MAKING THIS MOTION: If this is a motion to change past and future support payments under an order that has been assigned to a government agency, you must also serve this motion form on that agency. If you do not, the agency can ask the court to set aside any order that you may get in this motion and can ask for court costs against you.

Order that you want the court to make: (If you need more space, add an extra sheet but do not make any changes to this form.)

- An Order to amend a Temporary Order that was made on April 27, 2017 by Justice MacKinnon.
- An Order which specifically states that both parties are to provide ALL police records created between January 1, 2012 and November 10, 2015 (the date that the Applicant served the Respondent with an Emergency Motion granting the Applicant interim sole custody of the children.)

Laws and rules on which you are relying: (Give name of statute and section numbers; name of regulation and section numbers; and rule numbers.)

ONTARIO REGULATION 114/99 - FAMILY LAW RULES

I want the court to deal with this motion:

- ☐ by relying only on written material. ☒ in a hearing at which affected persons may attend personally.
- ☐ by conference telephone call. (An appointment for such a call must be arranged in advance; see rule 14 of the Family Law Rules.)

At this motion, I am relying on the following material:

- ☐ Tabs/pages _____ of the continuing record
- ☒ Pages 1 _____ of the transcript of the evidence of (name of person)

Justice MacKinnon

, dated April 27, 2017


(Relevant parts of the transcript must be highlighted.)

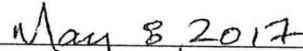
This party's lawyer (Give lawyer's name, firm, telephone & fax number and e-mail address [if any]. If no lawyer, give party's name, and address for service, telephone & fax number and e-mail address [if any].)

Other party's lawyer (Give lawyer's name, firm, telephone & fax number and e-mail address [if any]. If no lawyer, give party's name, and address for service, telephone & fax number and e-mail address [if any].)

Deirdre Moore
7 Vanson Avenue, Ottawa, Ontario K2E 6A9
mobile: 613-791-1451 deirdre@cceh.ca

Wade Smith
700-116 Lisgar Street, Ottawa, Ontario K2P 0C2
phone: 613-237-3444 wsmith@bellbaker.com


Signature


Date of signature

Superior Court of Justice, Family Court
Cour supérieure de justice - Cour de la famille

(Name of court / Nom du tribunal)

at / au 161 rue Elgin St, Ottawa Ontario K2P 2K1

(Municipality / Municipalité)

Court File Number / Numéro de dossier du greffe

15-2446

Endorsement Sheet /
Page d'inscription

Date	Applicant(s) / Requéant(e)(s): <u>Jonathan Kuska</u>	<input type="checkbox"/> Present / Comparait
04/07/17	Counsel / Avocat(e): _____	<input type="checkbox"/> Present / Comparait
Justice		<input type="checkbox"/> Duty Counsel / Avocat de service
MacKinnon	Respondent(s) / Intimé(e)(s): <u>Doreen Moore</u>	<input type="checkbox"/> Present / Comparait
	Counsel / Avocat(e): _____	<input type="checkbox"/> Present / Comparait
		<input type="checkbox"/> Duty Counsel / Avocat de service
<input type="checkbox"/> Order to go in accordance with minutes of settlement or consent filed. / Ordonnance conformément au procès-verbal de l'audience de transaction ou le consentement déposé.		

order to go requiring both
parties to provide their written
consent + direction to the CAS +
to OPS to provide both of them
copies of their records pertaining
to themselves and/or their children.
A to prepare divorce + custody + support
to appear in court
per kids Act 5.
J. MacKinnon

Superior Court of Justice Family Court Branch

(Name of court)

Court File Number

FC-15-2446-0

at 161 Elgin Street, Ottawa, Ontario K2P 2K1

Court office address

Form 14A: Affidavit
(general) dated

Rule 19 - Document

May 8/17 Disclosure

Applicant(s)

Full legal name & address for service — street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

Jonathan Kiska
1244 Lampman Crescent, Ottawa, Ontario K2C 1P8
mobile: 613-723-0010 jk@johnkiska.com

Lawyer's name & address — street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

Wade Smith
700-116 Lisgar Street, Ottawa, Ontario K2P 0C2
phone: 613-237-3444 wsmith@bellbaker.com

Respondent(s)

Full legal name & address for service — street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

Deirdre Moore
7 Vanson Avenue, Ottawa, Ontario K2E 6A9
mobile: 613-791-1451 deirdre@cceh.ca

Lawyer's name & address — street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

My name is (full legal name) Deirdre Ann Moore

I live in (municipality & province) City of Ottawa, Ontario

and I swear/affirm that the following is true:

Set out the statements of fact in consecutively numbered paragraphs. Where possible, each numbered paragraph should consist of one complete sentence and be limited to a particular statement of fact. If you learned a fact from someone else, you must give that person's name and state that you believe that fact to be true.

1. This Motion represents the FOURTH time that I have tried to get the documentation upon which the Applicant's Application is based.

2. Most recently, on April 27, 2017, Justice MacKinnon prepared an endorsement ordering both parties to agree to full disclosure regarding police (OPS) and CAS files. Justice MacKinnon asked that the other party prepare the documents as I am self-representing.

3. I feel that the other party's letter of Direction was:

- Restrictive &/or vague, in that I had no way of knowing if it would include, for example, a police file on Sexual Assault (See Exhibit A)
- Over-inclusive, in that it granted the other party access to my police files into perpetuity. (See Exhibit B)

4. The reason for my original 19.1 Motion was to gain an understanding of what was said to OPS in all of the files identified in Exhibit C, page 1; as well as any other files that were referred to therein or may exist without my knowledge.

5. I presented a simple solution to the other party on May 5th; where we would both get full disclosure of police events during the period in question. I did not receive a response and felt my only option was to proceed with another procedural motion.

6. I would like to be in a position to prepare an unmitigated Form 14C for the Settlement Conference scheduled for June 28th (in 43 days) but recognize that the OPS requires up to 30 days to provide police records.

May 8/17

Put a line through any blank space left on this page.

Sworn/Affirmed before me at City of Ottawa

municipality

in Ontario

province, state, or country

on

May 8th 2017
date

[Signature]
Commissioner for taking affidavits

(Type or print name below if signature is illegible.)

[Signature]
Signature

(This form is to be signed in front of a
lawyer, justice of the peace, notary public
or commissioner for taking affidavits.)



OTTAWA POLICE SERVICE
GENERAL OCCURRENCE HARDCOPY

GO# 2015-261835

This Exhibit: A SEX ASSAULT ANAL INTERCOURSE referred to in the

Narrative: INVESTIGATIVE ACTION - 5

Det Paradis

Author: 1553 PARADIS, SEBASTIEN E.

Related date/time: Thursday, 2015-Oct-15 19:24

Affidavit of Deandre Moore

sworn before me at the City of Ottawa, this

8 day of May, 2017

Chantal Leduc
A Commissioner receiving affidavits

On June 14, 2015, I DET PARADIS # 1553 reviewed this file as assigned through workflow.

[REDACTED]

[REDACTED]

[REDACTED] I will now be closing this file as the allegations made by MOORE appear to be unfounded and frivolous in nature.

No further action in this file by this office at this time.

end

S PARADIS

1553 det

PAU

Blacked-out text represents
comments made by Applicant

YAL

Respondent's edit
marked-up in red.
Yml

Bell Baker LLP
Barristers and Solicitors

Reply to: Wade L. Smith and Deirdre A. Moore

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DIRECTION

TO: OTTAWA POLICE SERVICE

RE: Jonathan Kiska and Deirdre Moore

This Exhibit 'B' referred to in the
Affidavit of Deirdre Moore,
sworn before me at the City of Ottawa, this
23 day of May, 2017.
Shirley Spool
A Commissioner for taking affidavits

I, JONATHAN KISKA and I, DEIRDRE MOORE hereby grant my authorization and consent for you to disclose to and correspond with both Mr. Wade L. Smith of the law firm Bell Baker LLP, Barristers and Solicitors, #700-116 Lisgar Street, Ottawa, ON K2P 0C2, solicitor for Jonathan Kiska, and Deirdre Moore, acting for herself, concerning any and all aspects of my family-law police-related matters that occurred during the period from January 1, 2012 to November 27, 2016, including, but not limited to, all the contents of any file and all reports that you have kept on my behalf, including correspondence, notes, etc..

} Original text
limits police
records to "Family
Law".

~~I FURTHER AUTHORIZE you to release to Bell Baker LLP and to Deirdre Moore any and all information whatsoever that they may require, from time to time; and this document shall be your good and sufficient authority for doing so.~~

} Paragraph
states access to
records forever.

DATED at Ottawa this 23 day of May 2017.

Witness

Jonathan Kiska

DATED at Ottawa this 23 day of May 2017.

Witness

Deirdre Moore

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Page 1 of 1

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Deirdre Moore

From: Deirdre Moore <deirdre@cceh.ca>
Sent: Thursday, May 4, 2017 10:59 AM
To: 'Lauren Daneman'
Subject: RE: CAS and OPS Disclosure >> Documents inadequate - Revisions attached
Attachments: 09_01 Consent to Order re CAS,OPS 201705 v2.docx; 09_02 Order re CAS,OPS 201705 v2.docx; 09_03 Direction CAS 201705 v2.doc; 09_04 Direction OPS 201705 v2.doc

Hi Lauren.

Thank you for your revision. Please note that the other CAS document also had my name spelled incorrectly and the Applicant's postal code was often incorrect. Please find attached all four documents with "tracked changes" turned on for your convenience. I trust that this is all the documentation required to expedite my Motion re: Rule 19 – Document Disclosure.

Regarding the OPS reports, I am sure you can appreciate that, as someone who is self-representing, I am not in a position to assess whether or not a particular police file is deemed to be Family Law-related. I would like the request to be inclusive of all files during the period in which the Applicant has referred to in his Application; to which I am sure Justice MacKinnon would agree.

Listed below are some of the OPS files in which I am interested:

- GO# 2013-54087 MHA SEC. 17 APPREHENSION
- GO# 2013-94611 MHA FORM 2 (labelled incorrectly, in my view, as I was the one who phoned the police)
- GO# 2014-172486 MHA HOSPITAL VOLUNTARY
- GO# 2014-175168 MISSING ADULT (16 & OVER)
- GO# 2014-177364 DISPUTE PARTNER
- GO# 2014-178463 DISPUTE PARTNER
- GO# 2014-178958 MHA HOSPITAL VOLUNTARY
- GO# 2015-257822 CUSTODY CHILD COMPLAINT (NO CHARGE) with attachment Case #257822
- GO# 2015-261835 SEX ASSAULT ANAL INTERCOURSE
- GO# 2015-259469 DISPUTE PARTNER

Interestingly, the only MHA Sec. 17 Apprehension was the very first one (which followed an argument that spanned a 10-day period and included extreme verbal and emotional abuse).

Note that some of the above-noted OPS files refer to other police conversations with the Applicant that did not include me and I look forward to reviewing those as well.

Thank you for your help.
Deirdre Moore

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

From: Lauren Daneman [mailto:LDaneman@bellbaker.com]
Sent: Thursday, May 4, 2017 7:38 AM
To: Deirdre Moore <deirdre@cceh.ca>
Subject: RE: CAS and OPS Disclosure >> Documents inadequate

Good Morning Ms. Moore,

My apologies for the spelling error in the CAS document. I have fixed it and resent.

Please let me know what is inadequate about the OPS document, and I will make the corresponding changes. The consent and direction used here is our standard template for requesting disclosure, and reflects the format that the OPS requires. I am happy to make adjustments as you prefer however, as Justice MacKinnon did order our offices to prepare the documents.

Best,
Lauren

From: Deirdre Moore [mailto:deirdre@cceh.ca]
Sent: Thursday, May 04, 2017 8:07 AM
To: Lauren Daneman <LDaneman@bellbaker.com>
Subject: RE: CAS and OPS Disclosure >> Documents inadequate

Hi Lauren.

I am sorry that I didn't have a chance to fully review the documents yesterday as I was with my children last night and I did not get back to my desk until this early morning.

Lauren, the documents regarding the police records are unacceptable and I will not be in to sign them today. I will provide another draft for your review and signing; however, I may not be in a position to get to that today. I will provide them to you as soon as possible. Also, my name on the CAS documents is spelled wrong in a couple spots.

Thanks so much.
Deirdre.

From: Lauren Daneman [mailto:LDaneman@bellbaker.com]
Sent: Wednesday, May 3, 2017 3:21 PM
To: Deirdre Moore <Deirdre@cceh.ca>
Subject: CAS and OPS Disclosure

Good afternoon Ms. Moore,

Pursuant to the endorsement of Justice MacKinnon, we have prepared the direction documents for the CAS and OPS. Mr. Kiska has attended our offices and signed them, and they are now ready for your review and authorization.

For ease of convenience, would you like to come by our offices to have this taken care of? I've attached the documents to this email for your review. Please feel free to contact me if you need any clarification.

YOURS TRULY,

LAUREN DANEMAN
STUDENT-AT-LAW

BELL BAKER LLP | Barristers & Solicitors
Suite 700, 116 Lisgar Street | Ottawa, ON K2P 0C2
Tel: (613) 237-3444, Fax: (613) 237-1413
Web Address: www.bellbaker.com

Superior Court of Justice Family Court Branch

(Name of court)

at 161 Elgin Street, Ottawa, Ontario K2P 2K1

Court office address

Form 14B: Motion
Form

Names of parties: Deirdre Moore
Jonathan Kiska

Applicant: Jonathan Kiska

Respondent: Deirdre Moore

Hearing date: April 27, 2017

Name of case
management judge:

This form is filed by:

☐ applicant ☒ respondent ☐ (Other; specify.)

This motion is made:

☐ with the consent of all persons affected ☒ with notice to all persons affected – unopposed
☐ with notice to all persons affected – opposition expected ☐ without notice

NOTE TO PERSON MAKING THIS MOTION: If this is a motion to change past and future support payments under an order that has been assigned to a government agency, you must also serve this motion form on that agency. If you do not, the agency can ask the court to set aside any order that you may get in this motion and can ask for court costs against you.

Order that you want the court to make: (If you need more space, add an extra sheet but do not make any changes to this form.)

An order that the Applicant provide an affidavit listing every document that is relevant to any issue in the case and is in the party's control or available to the party on request.

Laws and rules on which you are relying: (Give name of statute and section numbers; name of regulation and section numbers; and rule numbers.)

ONTARIO REGULATION 114/99 - FAMILY LAW RULES

RULE 19: DOCUMENT DISCLOSURE

AFFIDAVIT LISTING DOCUMENTS

19. (1) Subject to subrule (1.1), every party shall, within 10 days after another party's request, give the other party an affidavit listing every document that is,

(a) relevant to any issue in the case; and

(b) in the party's control, or available to the party on request. O. Reg. 114/99, r. 19 (1); O. Reg. 383/11, s. 5 (1).

Superior Court of Justice Family Court Branch

(Name of court)

Court File Number

FC-15-2446-0

at 161 Elgin Street, Ottawa, Ontario K2P 2K1

Court office address

Form 14A: Affidavit
(general) dated

Rule 19 - Document
Disclosure

Applicant(s)

Full legal name & address for service — street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

Jonathan Kiska
1244 Lampman Crescent, Ottawa, Ontario K2C 1P8
mobile: 613-723-0010 jk@johnkiska.com

Lawyer's name & address — street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

Wade Smith
700-116 Lisgar Street, Ottawa, Ontario K2P 0C2
phone: 613-237-3444 wsmith@bellbaker.com

Respondent(s)

Full legal name & address for service — street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

Deirdre Moore
7 Vanson Avenue, Ottawa, Ontario K2E 6A9
mobile: 613-791-1451 deirdre@cceh.ca

Lawyer's name & address — street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

My name is (full legal name) Deirdre Ann Moore

I live in (municipality & province) City of Ottawa, Ontario

and I swear/affirm that the following is true:

Set out the statements of fact in consecutively numbered paragraphs. Where possible, each numbered paragraph should consist of one complete sentence and be limited to a particular statement of fact. If you learned a fact from someone else, you must give that person's name and state that you believe that fact to be true.

1. On November 10, 2015, I was served with a Form 14: Notice of Motion (See Exhibit A, page 1) as well as a Form 14A: Affidavit (General). (See Exhibit B)
2. The Applicant made some very serious allegations regarding my ability to care for my children and requested an Order for, among other things, sole custody of our two children. (See Exhibit A, page 2)
3. Despite the allegations, the Applicant signed an Interim Shared Parenting Agreement - a complete departure from the statements made in his original Application. (See Exhibit C)
4. Form 8: Application (General) clause 23. stated that "The Respondent's medical, mental health , CAS records and police reports are highly relevant to the issues in this Application and will shed light on what course of action is in the best interest of the children.
5. I requested a list of the documents that were identified in ⁴ above on March 19, 2017 but was advised that "since they are your reports, it is your obligation to contact the various doctors/hospitals and produce your medical records." (See Exhibit D)
6. I served to the Applicant a Form A and Form B on April 11, 2017 (See Exhibit E) and was told that a Motion was unnecessary and that an Affidavit would be provided. As of April 20, nothing has arrived.
7. In order to prepare for the Settlement Conference scheduled for June 28, 2017, I require access to the documents upon which the Applicant's serious allegations of my capacity as a mother were based.

Put a line through any blank space left on this page.

Sworn/Affirmed before me at City of Ottawa

municipality

in Ontario

province, state, or country

on April 20th 2017

date

[Signature]
Commissioner for taking affidavits

(Type or print name below if signature is illegible.)

[Signature]
Signature

(This form is to be signed in front of a
lawyer, justice of the peace, notary public
or commissioner for taking affidavits.)

Superior Court of Justice Family Court Branch

(Name of court)

at 161 Elgin Street, Ottawa, Ontario K2P 2K1

Court office address

Form 14B: Motion
Form

Names of parties: Deirdre Moore
Jonathan Kiska

Applicant: Jonathan Kiska

Respondent: Deirdre Moore

Hearing date: April 18, 2017

Name of case
management judge:

This form is filed by:

☐ applicant ☒ respondent ☐ (Other; specify.)

This motion is made:

☐ with the consent of all persons affected ☐ with notice to all persons affected – unopposed
☒ with notice to all persons affected – opposition expected ☐ without notice

NOTE TO PERSON MAKING THIS MOTION: If this is a motion to change past and future support payments under an order that has been assigned to a government agency, you must also serve this motion form on that agency. If you do not, the agency can ask the court to set aside any order that you may get in this motion and can ask for court costs against you.

Order that you want the court to make: (If you need more space, add an extra sheet but do not make any changes to this form.)

An order that the Applicant provide an affidavit listing every document that is relevant to any issue in the case and is in the party's control or available to the party on request.

Laws and rules on which you are relying: (Give name of statute and section numbers; name of regulation and section numbers; and rule numbers.)

ONTARIO REGULATION 114/99 - FAMILY LAW RULES

RULE 19: DOCUMENT DISCLOSURE

AFFIDAVIT LISTING DOCUMENTS

19. (1) Subject to subrule (1.1), every party shall, within 10 days after another party's request, give the other party an affidavit listing every document that is,

(a) relevant to any issue in the case; and

(b) in the party's control, or available to the party on request. O. Reg. 114/99, r. 19 (1); O. Reg. 383/11, s. 5 (1).

I want the court to deal with this motion:

- ☐ by relying only on written material. ☒ in a hearing at which affected persons may attend personally.
- ☐ by conference telephone call. (An appointment for such a call must be arranged in advance; see rule 14 of the Family Law Rules.)

At this motion, I am relying on the following material:

- ☒ Tabs/pages Motion Form 14B + Affidavit Form 14A of the continuing record
- ☐ Pages ~~Motion Form 14B~~ of the transcript of the evidence of (name of person) re: Document Disclosure
- dated April 11/17

(Relevant parts of the transcript must be highlighted.)

This party's lawyer (Give lawyer's name, firm, telephone & fax number and e-mail address [if any]. If no lawyer, give party's name, and address for service, telephone & fax number and e-mail address [if any].)

Deirdre Moore
7 Vanson Avenue, Ottawa, Ontario K2E 6A9
mobile: 613-791-1451 deirdre@cceh.ca

Other party's lawyer (Give lawyer's name, firm, telephone & fax number and e-mail address [if any]. If no lawyer, give party's name, and address for service, telephone & fax number and e-mail address [if any].)

Wade Smith
700-116 Lisgar Street, Ottawa, Ontario K2P 0C2
phone: 613-237-3444 wsmith@bellbaker.com

Deirdre Moore
Signature

April 11, 2017
Date of signature

Superior Court of Justice Family Court Branch

(Name of court)

Court File Number

FC-15-2446-0

Form 14A: Affidavit
(general) dated

at 161 Elgin Street, Ottawa, Ontario K2P 2K1

Court office address

Applicant(s)

Full legal name & address for service — street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

Jonathan Kiska
1244 Lampman Crescent, Ottawa, Ontario K2C 1P8
mobile: 613-723-0010 jk@johnkiska.com

Lawyer's name & address — street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

Wade Smith
700-116 Lisgar Street, Ottawa, Ontario K2P 0C2
phone: 613-237-3444 wsmith@bellbaker.com

Respondent(s)

Full legal name & address for service — street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

Deirdre Moore
7 Vanson Avenue, Ottawa, Ontario K2E 6A9
mobile: 613-791-1451 deirdre@cceh.ca

Lawyer's name & address — street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

My name is (full legal name) Deirdre Ann Moore

I live in (municipality & province) City of Ottawa, Ontario

and I swear/affirm that the following is true:

Set out the statements of fact in consecutively numbered paragraphs. Where possible, each numbered paragraph should consist of one complete sentence and be limited to a particular statement of fact. If you learned a fact from someone else, you must give that person's name and state that you believe that fact to be true.

1. I was advised on November 10, 2015 that the Applicant was bringing an emergency motion against me.
2. Form 8: Application (General) clause 23. states that "The Respondent's medical, mental health, CAS records and police reports are highly relevant to the issues in this Application and will shed light on what course of action is in the best interest of the children.
3. I requested a list of the documents that were identified in 2. above on March 19, 2017 but was advised that "since they are your reports, it is your obligation to contact the various doctors/hospitals and produce your medical records." SEE EXHIBIT A
4. I believe it is their obligation to provide the reports that they suggest support this Application. There are many, and I would like to know which ones, specifically, were used. Furthermore, I do not have access to the Police reports listed in 2. above.

Put a line through any blank space left on this page.

Sworn/Affirmed before me at City of Ottawa

municipality

in Ontario

province, state, or country

on

April 11, 2017
date

[Signature]
Commissioner for taking affidavits

(Type or print name below if signature is illegible.)

[Signature]
Signature

(This form is to be signed in front of a
lawyer, justice of the peace, notary public
or commissioner for taking affidavits.)

Deirdre Moore

From: Wade Smith <WSmith@bellbaker.com>
Sent: Monday, March 20, 2017 7:33 AM
To: Deirdre Moore; jk@johnkiska.com
Subject: RE: Rule 19 - Document Disclosure

In that they are your reports, it is your obligation to contact the various doctors/hospitals and produce your medical records.

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 9:43 PM
To: jk@johnkiska.com; Wade Smith
Subject: Rule 19 - Document Disclosure

This Exhibit 'A' referred to in the
Affidavit of Deirdre Ann Moore,
sworn before me at the City of Ottawa, this
...11... day of April, 20 ~~2017~~ 2017
Alvin Spad
A Commissioner for taking affidavits

Mr. Kiska, Mr. Smith,

Perhaps I erred in my previous requests as per attached? Plus, I am not sure who to ask ... so I am asking both of you.

According to Form 8 of your Application (Disclosure and Police Enforceability Clause #23): "The Respondent's medical, mental health, CAS records and police reports are highly relevant to the issues in this Application and will shed light on what course is in the best interest of the children."

According to Rule 19: Document Disclosure,

19. (1) Subject to subrule (1.1), every party shall, within 10 days after another party's request, give the other party an affidavit listing every document that is,

- (a) relevant to any issue in the case; and
- (b) in the party's control, or available to the party on request. O. Reg. 114/99, r. 19 (1); O. Reg. 383/11, s. 5 (1).

(2) The other party is entitled, on request,

- (a) to examine any document listed in the affidavit, unless it is protected by a legal privilege; and
- (b) to receive, at the party's own expense at the legal aid rate, a copy of any document that the party is entitled to examine under clause (a). O. Reg. 114/99, r. 19 (2).

(3) Subrule (2) also applies, with necessary changes, to a document mentioned in a party's application, answer, reply, notice of motion or affidavit. O. Reg. 69/15, s. 7 (2).

Please provide documents as per Rule 19(1) with respect to your Application. Meanwhile, I will start working on a second Form 22.

Thank you.

Deirdre Moore, CFA, BBA