

**FORM 37A****Courts of Justice Act****NOTICE OF MOTION**

Deirdre Moore, acting as agent for Gonen Snir, will make a motion to the court on August 20, 2020 at 10:00 a.m. or as soon as possible shortly thereafter.

PROPOSED METHOD OF HEARING: The motion is to be heard:

- ☒ in writing under subrule 37.12.1 (1) because it is unopposed
- ☐ in writing as an opposed motion under subrule 37.12.1(4)
- ☐ orally

THE MOTION IS FOR:

1. An order for the removal of Gonen Snir (“Snir”) as lawyer of record from FC-15-2446 and FC19-CP08 under Rule 37.12.1 of the Rules of Civil Procedure as he has committed multiple crimes against his client and assisted her former spouse and the Children’s Aid Society of Ottawa in their ongoing emotional and financial abuse of her.
2. An order for costs on a full recovery basis under Rules 24 (8) of the Family Law Rules as Snir has demonstrated deplorable behaviour including, but not limited to, defamation, creating false documents and fraud.
3. An order that Snir shall not charge the client fees or disbursements for *any* work that he *claims* to have done as nothing was done in the client’s best interests (Rule 24(9) of the Family Law Rules).
4. An order that Snir’s retainer agreement be deemed void.
5. An order for \$2,000 in compensatory damages; the amount that Snir accepted as a retainer fee in November 2019 and applied against her account months later—despite accomplishing nothing except losing a records motion against the Children’s Aid Society of Ottawa.
6. An order for \$1,500 in compensatory damages; the amount that the client paid in order have the lien placed on the matrimonial home so that she could retain his firm.
7. An order for compensatory damages (\$1,500: amount to be confirmed); the amount that the client will be required to pay in order to have the lien *removed* from the matrimonial home.
8. An order for aggravated damages due to Snir’s:
  - a. breach of contract: \$50,000
  - b. breach of fiduciary responsibility: \$50,000
  - c. negligence: \$50,000
  - d. defamation: \$50,000
  - e. intentional infliction of emotional suffering: \$50,000
  - f. negligent infliction of emotional suffering: \$50,000

9. An order for pecuniary damages due to Snir's:
- breach of contract: \$50,000
  - breach of fiduciary responsibility: \$50,000
  - negligence: \$50,000
  - defamation: \$50,000
  - intentional infliction of emotional suffering: \$50,000
  - negligent infliction of emotional suffering: \$50,000

**GROUND FOR THIS MOTION** include Snir's multiple violations of both civil law and the *Criminal Code of Canada*.

**THE FOLLOWING DOCUMENTARY EVIDENCE** will be used at the hearing of the motion:

- Snir's scandalous 20200522 Motion materials filed in both Continuing Records (illegal in itself)
- Evidence of years of psychological, emotional and financial abuse by his client's former spouse (Jonathan Kiska ("Kiska")), his lawyer (Wade Smith) and multiple criminals operating under the Children's Aid Society of Ottawa all of which is contained in both Continuing Records.
- Further evidence against Kiska which is contained in Ottawa Police Services reports.
- An Affidavit (linked to evidence stored on advocacy website: [www.pfi.rocks](http://www.pfi.rocks)) by his client which contains e-mail evidence which further corroborates all of the above.

August 11, 2020 Deirdre Moore, 215 Montreal Road, Ottawa, Ontario K1L 6C8 || [dmoore@pfi.rocks](mailto:dmoore@pfi.rocks)

To: Other Parties

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