

Superior Court of Justice, Family Court

(Name of court)

at **29 Second St. W., Cornwall, Ontario K6J 1G3**

Court office address

Court File Number

FC-24-124

Form 14: Notice of Motion

Applicant(s)

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

Natashia Lynn Michinski
15490 Ashburn Road Berwick, ON
K0C 1G0
Tel: (613) 316-0412
nmichinski@gmail.com

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

M. Anne Vespry Barrister and Solicitor Suite
642 99 - 1568 Merivale Road Ottawa, Ontario
K2G 5Y7
Tel: 613 800 8334
Fax: 613 800 8334
anne@vespry.ca

Respondent(s)

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

Justin Skyler Zanth
15490 Ashburn Road Berwick, ON
K0C 1G0
skylerzanth@gmail.com

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

The person making this motion or the person's lawyer must contact the clerk of the court by telephone or otherwise to choose a time and date when the court could hear this motion.

TO THE PARTIES:

THE COURT WILL HEAR A MOTION on (date)

at, **or as soon as possible after that time, at (place of hearing)**

This motion will be made by (name of person making the motion)

who will be asking the court for an order for the item(s) listed on page 2 of this notice.

- ☐ A copy of the affidavit(s) in support of this motion is/are served with this notice.
- ☐ A notice of a case conference is served with this notice to change an order.

If this material is missing, you should talk to the court office immediately.

The person making this motion is also relying on the following documents in the continuing record: (List documents.)

If you want to oppose this motion or to give your own views, you should talk to your own lawyer and prepare your own affidavit, serve it on all other parties and file it at the court office not later than 4 days before the date above. Only written and affidavit evidence will be allowed at a motion unless the court gives permission for oral testimony. You may bring your lawyer to the motion.

IF YOU DO NOT COME TO THE MOTION, THE COURT MAY MAKE AN ORDER WITHOUT YOU AND ENFORCE IT AGAINST YOU.

Date of signature

Signature of person making this motion or of person's lawyer

Typed or printed name of person or of person's lawyer, address for service, telephone & fax numbers and e-mail address (if any)

NOTE TO PERSON MAKING THIS MOTION: You **MUST** file a confirmation (Form 14C) not later than 2:00 p.m. 3 days before the date set out above.

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 notice 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 costs against you.

State the order or orders requested on this motion.

Natashia and her counsel refused my requests of information pertaining to important information in regards to this case.

Request of information 1: All correspondence between Natashia and the finance company we refinanced our home with. Natashia denied counsel for me, without my knowing. There are other irregularities with the paperwork I have in regards to this. As I was apart of the refinance of our home just as much as Natashia was, I need to see what else she said on my behalf..

Request of information 2: Any and all correspondence in regards to refinancing our home with any financing provider that would have taken place in 2022 or 2023 as we started to look at refinancing in 2022. Text messages, dates and times of calls, emails, physical mail and so on. I should have access to this because the refinancing included us both, and with Natashia's behaviour coming to light in regards to the decisions she was making for me at that time, that she should not have done. Natashia refused legal counsel on my behalf without my knowing and I already have in my possession documents that contradict her statements that she is now claiming.

Request of information 3: All of Natashias finance documents, from when I found out about my medical condition till today's date. I should receive because Natashia was in control of the finances since that event took place. She paid and had access to my debts, her debts, bills everything and because she is not not only affecting my credit negatively now, I want to make sure everything is done correctly. To be clear, bank statements, credit card statements, everything that had to do with either of our finances.

Request of information 4: When we refinanced the home last time, Natashia stated that I would be getting the remaining balance after her Loans were paid, the ones she specifically told the bank with their amounts that I half paid for the moment they were put on the mortgage, were taken care of. I know my debts, never saw the amount that it should have after reviewing the documents. Natashia needs to provide all financial documents proving I was paid that amount. I was supposed to get a certain amount that she discussed with the finance company. If you can't prove it then, then she needs to repay that amount now as she obviously took it for her personal use.

Order of action: I would ask the court to order Natashia to get all documents that she has submitted thus far to be sworn with a notary instead of just her lawyer, due to the amount of false statements made and continue this for any document she submits moving forward. I feel that because Natashia has obtained a lawyer she feels that she can get away with committing acts of perjury she wouldn't otherwise try to commit. This would bring to light the truth of the matter without having to dig too deep into the evidence and waste everyone's time. This is not too much to ask because I've had to do this for everything I have submitted, if she does comply and submits the same paperwork, I have evidence to almost everything this she has stated to be false.