

From: Darryl Ross darrylross@icloud.com
Subject: Re: Ross v. Holmes - request for adjournment
Date: December 17, 2021 at 6:27 PM
To: Allison Lendor allison@lendorguest.ca

DR

Hi Allison,

Thank you for the update. I've been wondering what will happen if an agreement is not reached, or they do not respond. If nothing is agreed before Monday, do you have time to talk or meet on Zoom prior to the meeting?

Thank you,

Darryl

On Dec 17, 2021, at 6:23 PM, Allison Lendor <allison@lendorguest.ca> wrote:

Good afternoon Darryl,

This is just a quick update, I sent the email to Alison Boyce responding to their terms for the adjournment of the motion on Monday. I followed up with an email about an hour later. I still have not heard back from Ms. Boyce. If I hear anything over the weekend I will let you know. For now, until we get confirmation of the adjournment, then the motion is still on the court list as going ahead.

Allison

----- Forwarded message -----

From: **Allison Lendor** <allison@lendorguest.ca>
Date: Fri, Dec 17, 2021 at 3:38 PM
Subject: Ross v. Holmes - request for adjournment
To: Alison Boyce <alison.boyce@mannlawyers.com>

WITHOUT PREJUDICE

Good afternoon Alison,

I am writing further to your email of December 15, 2021 and our conversation on December 16, 2021.

With respect to the terms of the adjournment you are requesting, Mr. Ross' response is as follows:

1. Mr. Ross agrees that he has some outstanding disclosure that he will be providing as soon as possible, and will be provided within 45 days, but will make best efforts to provide it sooner. Regarding the specific disclosure you listed at paragraph 6 of your Notice of Motion the following are his comments:

6a) – Agreed.

6b) - Mr. Ross agrees to provide updated medical notes confirming that is following all treatments recommendations actively. Mr. Ross agrees that these notes will state whether he is doing so satisfactorily or not. They will include length of time, approximate number of sessions, and treatment recommendations for the future.

6c) – Mr. Ross will provide disclosure from July, 2020 Ms. Holmes refers to, as well as from May 2021

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6d) – Mr. Ross has never had a non-prescription addiction so that cannot be agreed to or provided.

6e) – Agreed.

6f) – Agreed.

6g) – Agreed.

2. Mr. Ross will continue to pay child support based on his current income. His up-to-date income information will be provided within 30 days so the accurate amount of ongoing child support can be paid.

3. Costs of the December 20, 2021, motion could be deferred to the judge hearing the motion once the date is rescheduled for early 2022.

4. Agreed.

We would also like to add a term of the adjournment that Ms. Holmes is prohibited from disclosing to family, friends or any other third-party documents or any information whatsoever that Mr. Ross discloses about his mental health, physical health, finances in the conduct of this litigation. This condition would apply both now and, in the future, as I understand that historically Ms. Holmes has used Mr. Ross' personal and confidential disclosure to disparage him to friends and family members.

Please let me know whether the above is acceptable to your client and we can adjourn the December 20, 2021, motion on those terms.

Regards,

Allison

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Allison Lendor
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