

From: Darryl Ross darrylundunlin@gmail.com
Subject: Re: Motion returnable on December 20, 2021 at 10:00 a.m.
Date: December 15, 2021 at 9:54 AM
To: Alison Boyce Alison.Boyce@mannlawyers.com
Cc: Michael Dam Michael.Dam@mannlawyers.com

Dear Ms. Boyce,

Charlotte's counsellor contacted me early this morning to inform me that she has not seen our daughter and has no updates since I met with her on 2 Dec.

Given the conflict between Ms. Holmes and me, and an upcoming motion that will once again result in a significant change to our daughters life - she can't have contact with her father, she can have contact with her father, over and over - she needs the support of Ms. Telford on a dependable schedule. Both of our daughters need dependable support regardless of how the motion turns out on Monday.

Presently, and during the entire period of time that Ms. Holmes includes in this motion, we have shared decision making ('joint custody' in the order). I believe strongly that our daughter needs the continued and ongoing support of an experienced counsellor given the timing, given the two concerns shared with Ms. Telford, and especially given the many and ongoing claims Ms. Holmes has made in her affidavit, and in her previous affidavits.

Whether I am involved or not, and regardless of the outcome Monday, please communicate my concerns and position on this matter to Ms. Holmes. Ms. Telford should have regular, scheduled sessions with our daughter.

Our youngest daughter also needs proper support. Please provide an update on what steps are being taken to do so.

Please confirm receipt of this email by noon today, and provide confirmation of appointments with Ms. Telford, and information about what steps are being taken to support both of our daughters.

Regards,

Darryl Ross

On Dec 10, 2021, at 3:01 PM, Alison Boyce <Alison.Boyce@mannlawyers.com> wrote:

Dear Mr. Ross,

I confirm receipt of your email.

Ms. Holmes does not agree to adjourn the motion. You were served with her initial motion materials two months ago and have had ample time and opportunity to obtain counsel.

If you intend to proceed with seeking an adjournment on December 20th, we will be seeking costs against you for time thrown away.

Sincerely,
Alison

*Please note our office will be closed for the Holiday season from noon (12:00 p.m.) on Friday, December 24th, 2021 to 8:30 a.m. on Tuesday, January 4th, 2022.
Have a safe and happy Holiday season!*



Alison Boyce | Lawyer | 613-566-2081
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From: Darryl Ross <darrylundunlin@gmail.com>
Sent: December 10, 2021 12:05 PM
To: Alison Boyce <Alison.Boyce@mannlawyers.com>
Subject: Re: Motion returnable on December 20, 2021 at 10:00 a.m.
Importance: High

Dear Ms. Boyce,

Due to factors relating to COVID and and legal aid limitations I have been unable to find a lawyer that is available and to take on this case despite widening the search radius.

As of yesterday afternoon I have had a change that directly affects my financial disclosure. It is a scenario which is privileged and confidential, and which I require legal counsel before I can accurately proceed with that particular part of disclosure.

I did not want to delay the motion because I believe the issue of access is urgent, but I cannot properly respond to the motion without legal counsel.

For these reasons I require an adjournment and kindly ask if your client will consent for the reasons provided. I will still provide financial disclosure as soon as possible, and will providing disclosure required from 2017, and further documentation about recovery.

I am preparing a brief affidavit in support of adjournment and will send it to you as soon as I have legal counsel regarding the scenario above, and no later than 14 Dec.

I kindly request confirmation that you have received this email, and a response no later than Monday December 13.

Thank-you,

Darryl

On Oct 20, 2021, at 5:20 PM, Alison Boyce <Alison.Boyce@mannlawyers.com> wrote:

Dear Mr. Ross,

Enclosed, please find the following documents for the motion returnable on **December 20, 2021 at 10:00 a.m.**

1. Notice of Motion (Form 14)
2. Affidavit in support of the motion (Form 14A)

These documents are being served upon you pursuant to the Family Law Rules. Kindly confirm receipt

These documents are being served upon you pursuant to the Family Law Rules. Kindly confirm receipt.

I will respond to your correspondence of October 18th under separate cover.

Sincerely,

Alison

As an essential service, we are still operating and are here to assist you, while respecting Provincial guidelines to ensure the health and safety of our staff and community.

Please visit our [COVID-19 Resource page](#) for answers to frequently asked questions, other useful information and important links.

Alison Boyce • Lawyer • 613-566-2081

Celebrating over 25 years serving the Ottawa community!



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<2021-10-20 Notice of Motion C. Holmes.pdf><2021-10-01 Affidavit of C. Holmes Final.pdf>