

November 25, 2015

Any Mayer
Victor Ages Vallance LLP
112 Lisgar Street
Ottawa, Ontario
K2P 0C2

WITHOUT PREJUDICE

VIA FACIMILE to 613-238-8949

Dear Ms. Mayer,

RE: Ross v. Holmes
Court File No.: FC-15-2492

Thank you for your letter dated today. I have reviewed your correspondence and proposal with my client and can advise as follows:

The Children's Aid Society

Ms. Holmes spoke with Ms. Heather Clarke of the Children's Aid Society ("the Society") this morning.

Ms. Clarke advised that the Society's file remains open and ongoing. She must speak with Charlotte's family doctor, CHEO, Mr. Ross's family and Ms. Holmes' family prior to concluding her investigation. Ms. Clarke must also speak with her supervisor before writing the final report and closing the file. The estimated time to complete the investigation is mid-end December.

Within that context, Ms. Clarke confirmed your client's advice that the Society does not require supervised access at this time. My client advises that Ms. Clarke and Ms. Holmes did not discuss the appropriateness of overnight access between your client and the children.

Ms. Clarke also advised that Mr. Ross has not signed a Society Consent and Release form so counsel may speak with Ms. Clarke directly. Kindly advise whether Mr. Ross agrees to submit said form so we may communicate with Ms. Clarke directly.

Correspondence between Ms. Holmes and Mr. Ross

Ms. Holmes informs me that Mr. Ross has been directly sending her emails discussing recent events. Kindly request your client not to send Ms. Holmes upsetting emails about the events that have transpired. My client was acting in a protective manner and was following the initial recommendations of the Society. We recognize that the past few weeks have been stressful for both parties and it would be best to focus on moving forward.

Ms. Holmes proposes that the parties use the software Our Family Wizard to communicate with one another. It is a web based co-parenting tool that the parties can use to coordinate schedules and access exchanges for Charlotte and Alice. Ms. Holmes would propose that the parties share the cost for the program equally. For more information, please visit www.ourfamilywizard.com.

Proposal

Ms. Holmes is uncomfortable with agreeing to overnight access until the Society completes its investigation and issues its report. In the interim, my client would like to make the following proposal:

Access

Mr. Ross will have access with Charlotte and Alice every Tuesday and Thursday from 3:45 p.m. to 6:00 p.m. and every Saturday from 10:00 a.m. to 6:00 p.m. Ms. Holmes proposes that Mr. Ross pick up Charlotte and Alice from school and daycare on Tuesdays and Thursdays and Ms. Holmes would pick them up after dinner at the matrimonial home. If your client is agreeable, access can commence tomorrow (Thursday, November 26, 2015) after school.

Ms. Holmes is open to alternate weekdays, or Sundays instead of Saturdays, if that would be more convenient for your client.

Ms. Holmes would like to propose Mr. Ross to have access this weekend on Sunday (November 29, 2015), as she would like to attend a family funeral that day.

Once the Society completes their investigation and we receive their final report, this schedule can be reviewed and altered to create a permanent custody and access arrangement.

The Van

Ms. Holmes would like the van returned to her as soon as possible to be able to commute with the children easily.

The Matrimonial Home

I understand that both parties wish to have the matrimonial home sold. In order to keep the family's costs down, Mr. Ross should continue to stay in the home until it is sold. Ms. Holmes has found a rental home in the area that she intends to move into on December 1, 2015.

Kindly advise whether your client would accept the above-noted interim arrangements. Please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alison Boyce', with a stylized flourish extending to the right.

Alison Boyce