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September 27, 2021

Darryl Ross
darrylondunlin@gmail.com

Dear Mr. Ross:

**Re: Holmes and Ross – parenting issues
Our File No. 2102868**

I confirm receipt of your correspondence of September 10th, September 21st and September 24th.

Request for Collaborative Family Law

Ms. Holmes and I have spoken about your request that she participate in the collaborative family law process to resolve the issues of parenting time. Ms. Holmes is not agreeable to same.

Your Continuing Recovery

I confirm that I received a letter from Dr. Bowling which states that he has been your treating physician since June 24, 2021. However, Ms. Holmes has serious concerns about your consistency and stability in your recovery. Substance/alcohol use is something Ms. Holmes advises you have been struggling with for over five years. Dr. Bowling states he has only been treating you for three months. We have no other supporting documentation for your participation in addiction treatment programs or doctor care you have received.

Other than the above-noted correspondence from Dr. Bowling, your correspondence has not addressed your alcohol or substance abuse issues or the treatment plans on an ongoing basis. You have repeatedly stated that you are serious about dealing with the alcohol and substance abuse issues and you are attempting genuinely to conquer those issues. Ms. Holmes has been provided no evidence of this, despite repeated requests, and is very concerned that you may be backsliding into alcohol or substance abuse difficulties as in the past, which deeply affects the children and access.

Ms. Holmes is concerned about the impacts of your infrequent contact with the children. The events of July 10, 2020 scared the children when you collapsed while they were in your care. The incident of October 15, 2020 was also scary for the children when you were attempting to contact them while you were unintelligible as a result of drug abuse or alcohol abuse and the paramedics at your home were attempting to treat you. There would be periods of months at a time where you would not even attempt to contact the children via Facetime.

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After you had Facetimed with the children in August 2021, Charlotte and Alice had a very difficult time coping after the video call. The children have had to see a therapist to help them cope with your addiction issues and inconsistent parenting. This type of behaviour is not in their best interests.

You have also been very unstable with your housing. I understand that you moved three times in the past two years. I understand that you had alleged issues with your landlords, which was often the claimed reason for your move. I also understand you were evicted from some of your previous homes. This type of behaviour causes serious concern to Ms. Holmes.

Your alcohol and substance abuse problem is related to the children's emotional and physical safety and well-being, as well as your ability to parent the children. The nature and extent of the problem and your ability to deal with it in the future may well be relevant to a determination of the best interests of the children.

I note that you have seen Charlotte and Alice on a few occasions. I understand that you saw Alice at the park during their school's Terry Fox Run on Friday. You even had an opportunity to say hello to Alice while she was there.

Disclosure requests

We have not received all of the disclosure pursuant to the Order of Master Champagne dated January 19, 2018. Nor have we received any response from you to my letter of October 30, 2020 until September 2, 2021. Further to my correspondence of October 30, 2020 and your response about a year later on September 10, 2021 that I provide you with a list of disclosure we require, I am still waiting for all of the following:

1. Complete hospital records regarding your treatment for the incident in July 2020;
2. Complete hospital records regarding your treatment for the incident in October 2020;
3. Per the Order of Master Champagne dated January 19, 2018 I still require the following:
 - a. Supporting documents pertaining to your treatment plans. I recognize that you have sent me a letter from Dr. Bowling, but I will require the additional documentation;
 - i. Copies of the urine tests you have been submitting to Dr. Bowling;
 - ii. Documentation from Dr. Bowling pertaining to your treatment;
 - iii. Documentation from Dr. Brenhouse about your alcohol treatment;
 - iv. Documentation from Dr. Souci regarding your treatment with the sleep clinic at the Royal Ottawa;
 - v. Documentation showing your consistent attendance at the S.M.A.R.T. Recover Program;
 - vi. Documentation about your participation and consistent attendance at the RAAM clinic at the Royal Ottawa;
 - vii. Updated documentation about your participation at Rideauwood Addictions and;
 - viii. Documentation from Dr. Harrison outlining what treatment she was providing to you after she stopped seeing Charlotte;

- ix. Documentation from Dr. Milestone pertaining to the care she was providing to you from 2015 -2017;
 - x. Documentation pertaining to any counselling or programs you have participated at with Family Services Ottawa; and
 - xi. Documentation pertaining to your brief stay with Serenity House Addiction Treatment Services in June 2021.
4. Per the Order of Master Fortier dated October 4, 2017, I also require documents relating to your car accidents from November 2016 and March 2017 including but not limited to police reports, accident reports, court documents, photos of the damage and bills for repairs to the car.
5. Information regarding your employment status or return to work plan.
6. Complete hospital records regarding your treatment for any other incidents in 2019, 2020 or 2021, in addition to the one mentioned above.
7. Your current address and contact information.

Once we receive the disclosure requested, we can begin to discuss a plan towards resuming parenting time and options for moving forward.

I look forward to hearing from your new counsel.

Yours very truly,

Mann Lawyers LLP



Alison Boyce