



PERLEY-ROBERTSON, HILL & McDOUGALL LLP/s.r.l.

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Reply to/Communiquez avec:
Alison Boyce
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November 25, 2019

BY EMAIL

Mr. Darryl Ross
Ottawa, ON
darrylondunlin@gmail.com

Dear Mr. Ross:

Re: Holmes and Ross - Access Schedule
Our Reference: HMCY0001

I confirm receipt of your correspondence of November 18, 2019 and have had an opportunity to review same with my client.

I note you are in breach of the disclosure provisions of the existing court order. Among other things, you have failed to provide the required documentation regarding your income, your substance abuse, treatment and car accidents.

Disclosure Outstanding

I confirm that I have **not** received your treatment details from the year 2018 nor 2019.

As such, I still require the following documentation from you:

1. A letter from Algonquin College stating your current and previous employment status at Algonquin College (full time, part time, or sick leave basis), your salary, and benefits you received or currently receiving;
2. A copy of your complete income tax return for 2018 with all schedules and attachments;
3. A copy of your Notice of Assessment for 2018;
4. Copies of your 3 most recent paystubs showing year to date income;
5. A copy of your T4 slip from Algonquin College for 2018;



6. For each year 2017, 2018 and 2019, complete disclosure and supporting documents pertaining to your treatment plans, programs or services regarding your alcoholism and/or prescription drug use;
7. Documentary evidence that you have completed any treatment plans during 2017, 2018 and 2019;
8. I have only received partial disclosure regarding your car accidents from November 2016 and March 2017. Therefore, please send any additional police reports, accident reports, court documents, photos of the damage and bills for repairs to the car. If there are no additional documents pertaining to these incidents that you have not already sent to my office, please confirm so in writing.

Additionally, I understand that you had a serious relapse which put you in the Intensive Care Unit of the hospital. The Children's Aid Society also had recommended that you continue your treatments for them to agree to close the file. Therefore, we are also seeking the additional documentation:

9. Details of the relapse;
10. Copies of any police report, if applicable;
11. The discharge report from your stay at the hospital and all related medical records;
12. Documentation to confirm what treatment you are currently seeking for your alcoholism;

I require this disclosure to ensure that the children are safe while in your care. You are alleging that you are sober and able to care for the children in an unsupervised capacity. I wish to obtain third party documentation to corroborate your statements.

Access

Ms. Holmes would like to begin to rebuild trust between the two of you, but it will take some time.

I understand that there was a verbal altercation between you and Ms. Holmes' mother. This type of behaviour is inappropriate and unproductive.

I understand that Ms. Holmes has proposed the following unsupervised schedule to you:



1. Thursdays from 4:00 p.m. – 7:00 p.m. with Ms. Holmes checking in with you at the beginning and the end of the visit. You would pick up Alice and Charlotte from Ms. Holmes' home and then she would pick them up from your residence.
2. Sundays from 12:00 p.m. – 5:00 p.m., with Ms. Holmes checking in with you when she drops off the children at your residence and then pick them up from your residence at 5:00 p.m.

Before any unsupervised access commences, Ms. Holmes requires the above-noted documentation with respect to your treatment and relapse. As the primary caregiver for the children, Ms. Holmes would also like to meet the family with whom you are staying. She would also like to see your basement apartment to ensure that it is a suitable environment for the children.

The access schedule Ms. Holmes has proposed is not indefinite. Ms. Holmes is agreeable to review this arrangement in February, after you have demonstrated your commitment to rehabilitation from your alcohol abuse as well as access visits without further incidents. If you provide the documentation we have requested above, it will certainly assist Ms. Holmes in feeling reassured that your sobriety is your top priority.

I wish to reiterate that the intent is to move to a shared parenting schedule provided the children are in a safe and healthy environment and that it is in the best interests of the children. However, this must be a gradual transition. We cannot go straight to a shared parenting arrangement when Ms. Holmes has not seen your accommodations. You have not provided any documentation to confirm your current financial situation, nor have you provided documentation to confirm that you are following the Society's recommendations, nor have you provided sufficient documentation of treatment and treatment plans. Further, you have not provided the court ordered disclosure with respect to your treatment for alcohol abuse and the consequent car accidents, among other things. Still further, you are making unilateral brash decisions regarding the children.

Motion Dates

My assistant Rebecca provided you with my availability yesterday. I also confirm that I am **not** available for a motion date on February 20, 2020.

I note that I sent you correspondence on September 24, 2019 requesting your availability for a motion in October, November and December. I did not receive a response from you until November 18, 2019.



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Darryl Ross

Sincerely,

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Alison Boyce
c.c. client