



Sudhir Morar <sudhir@morar.org>

Devani and Morar

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Mon, Mar 31, 2025 at 10:14 AM

To: roselyn@pecus.ca

Cc: laurie@pecus.ca, Stella <Stella@pecus.ca>

WITHOUT PREJUDICE

Dear Ms. Pecus,

I am following up on my email dated **March 24, 2025**, sent at 8:16 AM to you and copied to laurie@pecus.ca. To date, I have received neither a response nor confirmation of receipt, despite **clearly requesting both by March 26 at 4:00 PM**.

My goal remains to resolve this matter cooperatively—as I have consistently attempted since 2016—and I want to ensure that my communications are reaching you so that we may move forward constructively and without delay. To avoid any misunderstanding, I respectfully request that you **confirm receipt of my March 24 message by noon tomorrow, April 1, 2025**.

I also ask for **clarification regarding Ms. Devani's intentions** concerning the disclosure requests I outlined, specifically:

1. A complete accounting of CCTB/CCB benefits claimed since Jaimin has resided with me (from September 2015), including **exact dates, amounts, and CRA confirmation of any repayments**.
2. An updated valuation of the Ontario Teachers' Pension Plan.

If Ms. Devani does not intend to provide this disclosure, kindly **state that explicitly**. Does she stand by her claim—made in her **September 4, 2024**, response—that the CCTB/CCB funds were repaid, or has that position changed? I have hoped Ms. Devani would prioritize Jaimin's interests with *openness*. I remain committed to a fair resolution and am willing to accommodate reasonable needs on her part to facilitate a productive exchange. However, continued silence on these material issues may be interpreted as avoidance—something I trust is not your client's intention.

As you are aware, Ms. Devani has failed to provide any documentation or explanation regarding the CCTB/CCB payments she received while Jaimin was in my full-time care. She has also not substantiated her repayment claim with specifics. This lack of disclosure compels me to seek clarity from counsel. I trust your guidance reflects her true intent, not a *pattern of avoidance*.

Given the approaching **April 29, 2025**, Case Conference, please **advise urgently** whether:

1. Ms. Devani refuses to comply with her disclosure obligations under *Rule 13 of the Family Law Rules*; or
2. There is another explanation for the lack of response.

Should I not hear from you by **noon tomorrow, April 1**, I will be compelled to raise these concerns with the Court to ensure transparency and accountability. I would, however, much prefer to hear from you and resolve these issues without escalation.

Thank you for your attention to this matter. I remain committed to a fair, timely, and amicable resolution.

Yours sincerely,
Sudhir Morar

[Quoted text hidden]