

Court File No.: CV-23-91584

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

PAUL APSIMON

Plaintiff /
Defendant by Counterclaim

- and -

ELISA ROMERO HATEGAN

Defendant /
Plaintiff by Counterclaim

DEFENCE TO COUNTERCLAIM

1. The Plaintiff/Defendant by counterclaim, Paul ApSimon, denies each and every allegation made against him in the Statement of Defence and Counterclaim of the Defendant/Plaintiff by Counterclaim, Elisa Hategan. Mr. ApSimon puts Ms. Hategan to the strict proof of each and every allegation contained therein.
2. Mr. ApSimon states that the allegations contained in the Statement of Defence and Counterclaim are scandalous, frivolous and vexatious and should be struck.
3. These allegations represent a further baseless attempt by Ms. Hategan to attack Mr. ApSimon's credibility.
4. Mr. ApSimon pleads that the Counterclaim should be struck as it contains no reasonable cause of action.
5. Mr. ApSimon repeats and relies on the facts in the Statement of Claim for the purposes of his defence to the Counterclaim.
6. Mr. ApSimon intends to amend this Defence to Counterclaim to include further particulars. This document is being filed as Ms. Hategan refused a reasonable extension to prepare a

more detailed Defence and threatened to note the Plaintiff/Defendant by Counterclaim in default.

June 29, 2023

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PAUL APSIMON
Plaintiff

- and -

ELISA HATEGAN
Defendant

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ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT OTTAWA

DEFENCE TO COUNTERCLAIM

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