

N° du dossier du greffe : CV-23-00091584-0000

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

PAUL APSIMON

Plaintiff

- and -

ELISA HATEGAN

Defendant

DEFENDANT'S COMPENDIUM

September 13, 2024

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SECTION 1: PLAINTIFF'S FACTUM

Quotes from Apsimon factum or affidavit are in italics, with paragraph numbers from the original factum; relevant quotes from evidence or case law are beneath in plain text.

sexual predator?

11. *The defamatory sting of the expressions is clear: that Paul has committed acts of sexual impropriety and is a sexual predator...*

38. *As explained above, the most damaging expressions assert that Paul is a sexual predator, seeking sexual favours from young woman and girls to further their opportunities in fencing.*

84. *This litigation is targeted on the scandalous and damaging allegations relating to sexual impropriety.*

The phrase sexual predator, and the word predator in isolation, are never used in anything written by Ms Hategan. The statement of claim does not plead this as an innuendo. The word "predator" is not used in either affidavit filed by the Plaintiff.

cross-examinations

20. *"There have been no cross-examinations on the various affidavits filed by the parties. This is an action commenced under Rule 76 and cross-examination on affidavits are not generally allowed in such proceedings."*

Courts of Justice Act

137.2 (1) A [anti SLAPP] motion to dismiss a proceeding under [section 137.1](#) shall be made in accordance with the rules of court, ***subject to the rules set out in this section...***

(4) Subject to subsection (5), cross-examination on any documentary evidence filed by the parties shall not exceed a total of seven hours for all plaintiffs in the proceeding and seven hours for all defendants. [2015, c. 23, s. 3.](#)

1704604 Ontario Ltd. v. Pointes Protection Association, 2020 SCC 22 (CanLII), [2020] 2 SCR 587, para 52:

"...indeed, the legislative scheme allows limited cross-examination of affiants..."

Rules of Civil Procedure

Court May Dispense with Compliance

Rule 2.03 The court may, only where and as necessary in the interest of justice, dispense with compliance with any rule at any time. R.R.O. 1990, Reg. 194, r. 2.03.

Endorsement of Associate Justice M. Fortier, Oct 12 2023 (emphasis added):

"2- The defendant shall have her anti Slapp motion heard on March 27, 2024. One half day is set aside. To that end the following timetable will apply:

- a) The defendant shall serve her motion material by November 30, 2023.
- b) The plaintiff's material shall be served by January 12, 2024.
- c) **Cross-examinations shall take place** by February 9, 2024."

The Safe Sports report does confirm allegations concerning the plaintiff

40. *Hategan also claims to rely on a safe sport report from 2021 which does not confirm any of the allegations she has unjustly made towards Paul. That report deals with allegations into another coach (not Paul's) coaching style and technique.*

from Mr Apsimon's affidavit:

56. *"In the Safe Sport Investigation Report, no allegations are made regarding my behaviour towards athletes. Quite to the contrary, the report indicates that: "High Performance Director Benjamin Manano says that more often than not, debriefings are "emotional. The one in Lima was extreme. It should be noted that head coach Paul Apsimon was not present at the event. The latter, more composed, often moderates and animates these meetings after events."*

57. *Instead, the Report suggests that I was aware of issues with a different coach and could have integrated this foreign coach into the Canadian culture and standards."*

from the Safe Sports report (Hategan November 30 affidavit, exhibit A) - emphasis added:

"1. The national program was built by **head coach Paul Apsimon...."**

pp 15-16 of report: "I have heard repeatedly, from the vast majority of people I have met, that the sport of fencing is one of strong emotions, that it is in the nature of the sport for a coach to speak loudly, to pick on referees, and to "push" the athletes towards a culture of hard work. These were the goals the Canadian Fencing Federation had in mind when they hired Coach Lebrun. In theory, it is commendable to aim for these goals. However, there are limits to this practice. It is my opinion that **these limits have been exceeded too often** by Coach Lebrun **and tolerated by the staff (read head coach and high performance director) resulting in a climate that resembles a culture of systemic bullying.** It took a strong stand by the athletes last December to move the discussion forward to the level known to date and implement concrete change."

non-existent allegation that article contains mention of abortion

42. Finally, both Paul's and Dina's sworn affidavits disprove the allegations brought forth in Hategan's Article. They have both denied... the scandalous allegation concerning Dina's pregnancy resulting in an abortion.

from Truth Is Stronger Than A Sword: "When I was living in Residence at the Marchand apartments, Deanna used to come hang out in my room between classes.... That's when she'd tell me all her stories about Paul – how they snuck around having sex on campus, her accidental pregnancy, and how they did it in the stairwell of the Sports Centre/Athletic Dept building."

Statement of Claim: no mention of either pregnancy or abortion, no allegation that the plaintiff has been defamed in this respect.

Plaintiff's evidence concerning when he discovered the defamation is in fact challenged

70. Paul only became aware of the defamatory remarks from the 2008 and 2012 articles (in which Hategan does not use his name) when the Article was published on February 21, 2023, identifying him. This evidence is unchallenged.

from Ms Hategan's Nov 29 2023 affidavit:

"70. Part of Apsimon's claim consists of blog articles I wrote in August 2008 and 2012, during or around the time of the Beijing and London Olympics respectively, which mention an unnamed fencing coach from the University of Ottawa having inappropriate sexual relations with student athletes. Apsimon knew, or had to have known, about my blog posts, given that at least one of my blog posts received extensive traffic due to my commentary on a scandal involving my former teammate Sherraine Schalm's outburst to Hungarian coaches after her elimination bout, which had received broad CBC News coverage.

"71. Given the small size of the Canadian fencing community and the small number of elite coaches, anyone familiar with that community would have known to whom my posts referred.

"72. I believe that Apsimon did not want to draw attention to the substance of my statements about my fencing experiences at the University of Ottawa, particularly as I had not named him in my blog posts and he did not want to risk a scandal during an Olympic year. His decision not to sue within the limitations period had to have been a deliberate choice."

non-existent allegation of drug use

76. *As a fencing coach to young athletes, the allegations suggesting that he is a sexual predator, provides alcohol to underage athletes, and fosters a sexually charged and drug-influenced environment are profoundly damaging.*

There is no allegation of drug use in the words complained of, nor does Apsimon mention allegations of drug use in his statement of claim. For that matter, nowhere in his affidavit does Apsimon deny that drug use took place.

from *Truth is Stronger Than a Sword*, quoted in Claim para 14:

“They (or most of them) drank, but surprisingly no one smoked. Incredible – I still can’t get over it. Being among up to 30 people, with no one smoking! [...] Anyway, everyone played games – the usual paper bag one, as well as a whole new bunch: the animal noises charades, and the drinking game “I never did etc.”, and then Truth or Dare.”

no allegation of sexual abuse of minors

78. *But the sting of the expressions is far more serious and concerns sexual abuse and manipulation, potentially against minors.*

From Ms Hategan’s November 29 affidavit:

66. Apsimon’s Statement of Claim makes serious allegations that are demonstrably inaccurate and overreaching, including the fact that some of the alleged defamatory meanings at Paragraph 25 of his claim are not present in my articles and cannot even be construed as having been articulated in any way whatsoever by me. To put it simply, I have not said or done several of the things I am being falsely accused of. Examples of the most egregious inaccuracies include:...

b. “[Apsimon] Engaged in sexual behaviour with minors” – I have never made this claim in any publication or communication with anyone, at any point. I made it absolutely clear that all the persons I wrote about who were sexually involved or got naked in front of Apsimon were adults, specifically undergraduate university students. I do not see how anything I have written could be remotely construed as me having stated that Apsimon had sexual relations with minors.

indicia of a SLAPP are relevant only to a limited extent

from 1704604 Ontario Ltd. v. Pointes Protection Association, 2020 SCC 22 (CanLII), [2020] 2 SCR 587:

[78] ... I note that in *Platnick v. Bent*, [2018 ONCA 687](#), 426 D.L.R. (4th) 60, at para. 99, Doherty J.A. made reference to recognized “indicia of a SLAPP suit” (emphasis omitted). He recognized four indicia in particular: (1) “a history of the plaintiff using litigation or the threat of litigation to silence critics”; (2) “a financial or power imbalance that strongly favours the plaintiff”; (3) “a punitive or

retributory purpose animating the plaintiff's bringing of the claim"; and (4) "minimal or nominal damages suffered by the plaintiff" (para. 99). Doherty J.A. found that where these *indicia* are present, the weighing exercise favours granting the s. [4] motion and dismissing the underlying proceeding. The Court of Appeal for Ontario has since applied these *indicia* in a number of cases (see, e.g., *Lascaris v. B'nai Brith Canada*, [2019 ONCA 163](#), 144 O.R. (3d) 211).

[79] I am of the view that these four *indicia* may bear on the analysis *only to the extent* that they are tethered to the text of the statute and the considerations explicitly contemplated by the legislature. This is because the s. [4(2)(b)] stage is fundamentally a public interest weighing exercise and not simply an inquiry into the hallmarks of a SLAPP. Therefore, for this reason, the only factors that might be relevant in guiding that weighing exercise are those tethered to the text of s. [4(2)(b)], which calls for a consideration of: the harm suffered or potentially suffered by the plaintiff, the corresponding public interest in allowing the underlying proceeding to continue, and the public interest in protecting the underlying expression.

[80] Accordingly, additional factors may also prove useful. For example, the following factors, in no particular order of importance, may be relevant for the motion judge to consider: the importance of the expression, the history of litigation between the parties, broader or collateral effects on *other* expressions on matters of public interest, the potential chilling effect on *future* expression either by a party or by others, the defendant's history of activism or advocacy in the public interest, any disproportion between the resources being used in the lawsuit and the harm caused or the expected damages award, and the possibility that the expression or the claim might provoke hostility against an identifiably vulnerable group or a group protected under s.15 of the *Charter* or human rights legislation. I reiterate that the relevance of the foregoing factors must be tethered to the text of s. [4(2)(b)] and the considerations explicitly contemplated by the legislature to conduct the weighing exercise....

[Emphasis in original.]

[82] In conclusion, under s. [4(2)(b)] the burden is on the plaintiff — i.e. the responding party — to show on a balance of probabilities that it likely has suffered or will suffer harm, that such harm is a result of the expression established under s. [4(1)] and that the corresponding public interest in allowing the underlying proceeding to continue outweighs the deleterious effects on expression and public participation. This weighing exercise is the crux or core of the s. [4] analysis, as it captures the overarching concern of the legislation, as evidenced by the legislative history. It accordingly should be given due importance by the motion judge in assessing a s. [4] motion.

indicia of a SLAPP

financial disparity:

from Ms Hategan's Nov 29 2023 affidavit:

2. as a freelance journalist, I have no institution paying me a salary and am of limited means. This lawsuit, brought in Ottawa while I live in Toronto at a time when courts have returned to in-person attendances, greatly prejudices me financially. This contrasts with the plaintiff, who has a steady income and comes from a well-off family.

retaliation:

from Truth is Stronger Than A Sword, reporting on statements by an Olympic fencer:

- "So I went to Paul, and I made sure it was a very public scene, with other coaches and my teammates, and I told him all the things that had been going on with Yoann, and he kind of had no choice but to report it, for the stake of his job, because if he didn't report it, with all the Safe Sport going around, that he would probably also be in question."

- "So a third-party investigation happened – the CFF hired the investigator, and the second that they hired the investigator, Paul started threatening me, saying that I was going to be ruining Yoann's life, that I'm ruining my fencing career, I'm hurting him, all this kind of stuff."

- "It turns out there were already complaints from the Toronto Fencing Club against Yoann, before I even launched my complaint and my teammates launched their complaints"

- "The Safe Sport investigator, third-party investigator, found that there was systemic bullying within our program, and it directly named both Paul and our high-performance director."

SECTION II - APPENDIX TO PLAINTIFF'S FACTUM

portions in italics are excerpts from the Schedule C of the Plaintiff's factum.

"3 out of the 4 undergrad girls on that varsity team had been sexually exploited by our university's Olympic coach.

The students Paul slept with were always chosen for the varsity team.

Unlike others, Paul did not "come on to" Hategan sexually.

Paul created a sexually charged atmosphere

June 7 2022 tweet, and Hategan affidavit November 29 2023, para 16: "3 out of the 4 undergrad girls on that varsity team had been sexually exploited by our university's Olympic coach. Two slept with him & one got naked at his cottage during "team spirit" sessions."

Hategan affidavit, November 29 2023

para 16: "The varsity team was small, consisting of four members. In the years 1996, 1997 and 1998, one member had been Apsimon's girlfriend, another member was Dina, who became his wife, and a third member was one of the fencers who had behaved exhibitionistically in Apsimon's presence, swimming naked in the summer and making nude angels in the winter snow. I had seen her do this at his cottage on both occasions."

para 60: 'Apsimon created a tiered, exclusionary system for giving lessons and choosing varsity team members based on women he favoured – whether they were sexually involved with him, were naked in his presence, or were simply perceived as "easy-going", "fun", or having "team spirit", and he showed prejudice against those who didn't go along or questioned his actions, or who simply were not as "easy-going".'

para 62: "My fencing journals describe inappropriate and/or uncomfortable situations, such as: ... b) Athletes stripping naked and engaging in inappropriate behaviour as part of our team bonding cottage trips; c) The sexual relationship between my best friend and Apsimon, which she described to me at the time in explicit detail;... "

Reply affidavit, March 11 2024, para 26

26. "In the years 1996 and 1997, the Women's Foil varsity team consisted of two women who had been romantically involved with Mr Apsimon (Dina and Marijo), and one other fencer (Irene Enright) who was a scholarship student from out of province, ranked in the top 20 nationally, and excelled so far beyond everyone else that her qualifications for a team spot could not be denied. In the year 1998, one woman who had been romantically involved with Apsimon (Marijo) continued to occupy a spot on the team."

Hategan claims to not have never (sic) meant to suggest that Paul was a deliberate sexual predator but that her article was about coaching favouritism more generally.

Oxford Dictionary of English: predator | ˈpɹɛdətə |

noun

1 an animal that naturally preys on others: *wolves are major predators of small mammals.*

2 a person who ruthlessly exploits others: *a sexual predator...*

Hategan affidavit, November 29 2023, para 66. "I never stated or inferred that Apsimon demanded or expected sexual favours from athletes he coached. What I clearly stated, and can be substantiated via corroborating evidence from my 1990s fencing journals, is that the young women who willingly became sexually involved with him – of their own volition – received additional attention and special treatment such as extra lessons, one-on-one coaching, and spots on the Ottawa U varsity team. Others who were equally or more talented or capable, lost opportunities as a result of his overt favouritism."

Reply affidavit, March 11 2024, paragraph 6: Contrary to what Dina gleans from my affidavit, I have not alleged that Paul was "seeking out students to sleep with from the fencing team", as she put it in paragraph 7 of her own affidavit. If that were true, then Paul would be just one bad apple and my writing would not have raised any significant moral questions. I was trying to describe a more complex and subtle pattern of interactions and favouritism, one that goes beyond simply weeding out the predators in the system. My writing struck a chord and influenced other fencers to come forward because I was describing something more complicated and fundamental about the coach-fencer relationship as it existed. Whether I succeeded in properly explaining that or not, I have never alleged that Paul was a deliberate sexual predator, nor do I think of him as being one.

Paul says that he was never Dina's high school teacher.

Hategan affidavit, March 11 2024:

9. As Mr Apsimon points out in paragraph 18, he was a supply teacher with the Carleton Board of Education. In this capacity, he taught his wife-to-be Dina when she was a high school student, according to what she told me and I believe.

Hategan July 7 2024 affidavit, para 28: I agree, however, that Paul Apsimon was not literally Dina's high school teacher; he was a supply teacher who taught at her high

school when she was a student there.

Paul says that Dina never got pregnant during their relationship.... Hategan does not respond to Dina's evidence

Hategan July 7 2024 affidavit,, para 28: The most intense years of our [Elisa Hategan and Dina Vitale's] friendship were when we attended university together. These were also the years when our interactions were face-to-face, with little need to keep in touch by letter or email. The emails we did exchange during that time are not accessible to me. Accordingly, there are some things about which Dina and my recollections disagree and for which there is no paper record either way. I maintain the assertions made in my earlier affidavits.

Hategan was not invited to Paul and Dina's wedding.

Hategan July 7 2024 affidavit, paras 22-23:

22. With the first wedding, to Paul in 2002, she asked me in a phone conversation to come to the ceremony and I went so far as to buy the wedding present, but the written invitation never arrived; she later claimed that it had been lost in the mail. My message to her expressing my frustration and disbelief with this explanation and saying that I "still have your damn wedding present and all right here" is dated July 27 2002.

23. I agree with her to some extent about the first wedding; I have no doubt that the invitation to it was conveniently lost because Paul did not want me to be there, and that she clumsily lied to me about this in order to preserve the friendship. Despite this strain, and some earlier strain during our travel to Europe together, we remained in touch and she visited myself and my partner at our home in Toronto in 2003. The following year, in 2004, we visited her at her and Paul's home in Ottawa, before she separated from Paul and moved to France.

Hategan speaks of her "varsity fencing experiences," her teammates on the "varsity team" and her "varsity years"

varsity | vɑːsɪti |

noun (plural **varsities**)

British dated, South African, or NZ university: he had his hair cut when he got back from varsity.

- *[as modifier] British* (especially of a sporting event or team) relating to a university, especially Oxford or Cambridge: *a varsity match.*
- *North American* the principal team representing a high school or college in a sport or other competition: *Miller promoted him to the varsity for his sophomore season.*

Hategan affidavit, November 29 2023, para 6

6. "For most of that time, I trained with the University of Ottawa varsity team and other fencers who belonged to the Excalibur fencing club; after my second year, following unfair treatment from my coach, the plaintiff Paul Apsimon, I started to train alongside the varsity fencing team at Carleton University."

62. e) "My frustration with the fact that despite training up to six days a week (both at Ottawa U and Carleton) and having done everything possible to earn a certain classification, two years after I regularly trained alongside the varsity team, Apsimon purposely under- ranked me in order to under-coach me and separate me from the rest of the A-classified fencers, who trained at different times, which further isolated me;"

Reply affidavit, March 11 2024,

27. "I agree with Mr Apsimon when he says I was never a varsity athlete. I have never claimed to be one and, contrary to what he writes..., I have never claimed to have "won a 'varsity' championship". As I indicated in my earlier affidavit, I consider my exclusion from the varsity team to have been an inappropriate decision made by Mr Apsimon, whose intimate relationships with two out of 4 athletes on the Women's Foil varsity team would naturally have interfered with his ability to make unbiased, impersonal selections when it came time to choose the team."

28. When I referred to "varsity years" in my first affidavit, I used the term in the more general sense of the word to mean my time in university, where I took part in intercollegiate and regional "open circuit" competitions, as well as trained alongside members of the varsity team – this seems to be the source of the misunderstanding in paragraph 42 of Mr Apsimon's affidavit.

Hategan originally claimed that Paul was her Head Coach....Hategan swears that Paul was Head Coach of the Excalibur Club and Varsity Team.... Hategan explains that Paul was the Assistant Coach.

From "Truth is Stronger Than a Sword": I started fencing in my 1st year of undergrad at the University of Ottawa. Our head coach was Paul Apsimon, who has been national team coach for over two decades. To date, he has coached Women's Foil through the last 4 Olympic games, most notably Rio and Tokyo.

Nov 2023 affidavit, para 4. "The Plaintiff, Paul Apsimon, was my fencing coach during my undergraduate years at the University of Ottawa. Contrary to what is written in his Statement of Claim, Apsimon's duties were not relegated to "mostly administrative functions". As the head coach of both the University of Ottawa varsity team and the Excalibur Fencing Club, Apsimon coached both varsity fencers and club fencers. The selection of varsity team members was made by Apsimon from among the full-time university students who attended and trained together at the Excalibur club, which operated on University of Ottawa property."

Hategan March 11 2024 affidavit, paras 14-19:

14. "The distinction that Mr Apsimon draws in paragraph 17 of his affidavit, between coaching and running practices, is a subtle one of which we fencers were not aware at the time, and which seems a retrospective effort to avoid responsibility rather than a statement of fact. We knew him as the assistant coach. This is how he was introduced to me and others, and this is how I related to him.

15 "Mr Apsimon coached athletes from the University of Ottawa, including not just athletes on the varsity team but also other university fencers, as well as members of the community at large who signed up for classes and attended practice regularly. He was certified as a fencing coach by the Canadian Fencing Federation (CFF) many years before we ever crossed paths.

16 "Certainly, my relationship to him was that he was my coach and I was a student athlete. There is no other way to describe it. I had no knowledge of where his pay-check came from – whether he was paid by the university, subcontracted through Manuel Guittet, or retained under some other arrangement, and it made no difference to our relationship as athlete and coach.

17. "The fact that he continued to fence competitively also makes no difference – a coach doesn't have to be retired from their sport in order to coach athletes. Either way, he was our coach, and he coached on the premises of the University of Ottawa. His decisions and behaviour impacted University of Ottawa students like me, and the women he was sexually involved with, who were also undergraduate students.

18. "The Excalibur Club that he described in his affidavit functioned like a university club. Like many other campus clubs, it was also open to non-university students and members of the community who registered for recreational sports and paid fees to the Sports Services Department, but operated out of university spaces and catered primarily to university students.

19. "As assistant coach, Mr Apsimon had input into the selection of athletes for the varsity team. The Head Coach, Manuel Guittet, consulted with him on many occasions. I disagree with Mr Apsimon's claim at Paragraph 23 that during the time I was a student athlete, Thalie Tremblay (who I believe is Guittet's daughter) was a Head Coach. I don't remember her being present at practices, and I know that she never coached me. I believe she may have been away on maternity leave, or for some other reason not working with the Women's Foil team during the period of 1996-1997. The only coaches I remember training athletes in an official coach capacity were Guittet and Apsimon."

Part III - VITALE AFFIDAVIT

quotes from Vitale affidavit are in italics; all other quotes are from Exhibit A to Ms Hategan's July 7 2024 affidavit

10. *Although I was friendly with Hategan, and we did spend time together as friends, I would not have described her as "my best friend".*

July 12 2000 email: KAT, there is a certain depth in a person that I need....of the people i've met here, practically no one has it..(oila a wee bit.but not so much) You had a lot of it...and i did,do consider you to be one of my dearest friends...geelisten to me....i still count yona & hala my best friends..they've been eversince i was born...but you understand...strange..

anyway...i love you kat..don't worry...in a non sexual way of course....and don't crunch up your eyebrows and ask..."do you find me pretty?" You're beautiful!

September 7 2000 email: " I could NEVER forget about you... you are one of my best friends..."

12. *I now realize that in my interactions with her, I was "walking on eggshells" as Hategan tended to overreact if someone said something that she did not like. I tried to avoid saying anything that would upset her.*

December 5 2000 email, Vitale to Hategan:

"Re: you LOSER!

"no you accidental product of scummy drops of cum! I DID send it to you. But i fucking know exactly what your prozak deprived hallucinating brain did with it. I bet you ANYTHING you erased it with junk mail, you miserable twit. ... kisses my stinky roma peasant friend."

17. *I did not invite Hategan to either my first wedding (to Paul ApSimon) or my second wedding.*

October 3 2007 email, Vitale to Hategan:

Hey smelly!!

Ok,

So you didn't come to my wedding. I got married anyway. am now 5 months knocked up.. so there!!!

37. *Hategan did ask me about my relationship with Paul and would ask for intimate details about it. I would refuse to engage by politely laughing at her questions, not answering one way or the other, and changing the subject.*

from Nov 21 2000 email: "...i have to spend time with paul, who is getting sadder &

more pathetic dailly”

from September 9 2000 email: “anyway, i've come to the realization that no one person can ever offer all i want. God just never reached that level of perfection when he made men...and women...pity....but it just means that i will may have one person & enjoy the gifts of others....i think that will be it....i don't think i'll ever be able to be completely faithful. i'm like a kid...i want ALL the candy & am clueless to the word "share"....what the fuck am i blabing about...wow”

The emails and texts appended to the July 7 2024 affidavit routinely share intimate details of her interactions with other men, and are too numerous to be excerpted here.

APSIMON v HATEGAN

Court file no. CV-23-00091584-0000

SUPERIOR COURT OF JUSTICE

DEFENDANT'S COMPENDIUM