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*ONTARIO*  
SUPERIOR COURT OF JUSTICE

B E T W E E N:

PAUL APSIMON

Plaintiff

- and -

ELISA HATEGAN

Defendant

SECOND SUPPLEMENTARY MOTION RECORD

(Containing Reply Affidavit Of E Hategan, March 11 2024)

September 12, 2024

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AFFIDAVIT OF ELISA HATEGAN  
sworn March 11, 2024

1. I am the moving party in this motion, and am writing this affidavit to respond to that of the plaintiff, Paul Apsimon, dated February 19, 2024. The affidavit was served on me very late in the proceedings. According to the court approved timetable, his motion materials were to be served January 12, 2024, with the last date for cross-examinations on affidavits being February 9.
2. Attached as Exhibit A is the series of emails concerning the missed deadlines sent to Mr Apsimon's lawyers by my counsel on this motion, together with the replies.

3. As best I understand the purpose of Mr Apsimon's affidavit, he is trying to downplay the extent of his acquaintanceship with me and denying that I had aptitude as a fencer, in order to avoid any suggestion that his actions towards me were wrongful or discriminatory. He is also downplaying or denying his role as coach in order to avoid any suggestion of impropriety around his relationships with the athletes who trained under him. In both respects, he is bending the truth or telling utter falsehoods.

Ongoing contact with Apsimon after university.

4. I agree with Mr Apsimon's statement in paragraph 12 of his affidavit that he and I were not close friends; if anything, I would have characterized our interactions as cool or cold rather than cordial. However, his contention in paragraph 13 that we did not remain in contact after I left the club is false, or at best misleading.
5. I continued to be friends with the woman who became his wife, Dina Vitale, even after we graduated and she and Apsimon married. In or about the Spring of 2004, I visited them at their home at 331 Templeton in Ottawa with my girlfriend, who was introduced to Paul as my partner.
6. This contact contradicts Apsimon's statement in paragraph 52 that "I did not even know that Hategan identified as gay until reading her blog post in February

2023.” It is not something he could have avoided noticing, since I and my girlfriend came as a couple to his house. Furthermore, Dina came and visited my partner and I at our apartment in Toronto in 2003, when she was still married to Apsimon. It is implausible that he would have no clue as to what his wife was doing, and who she was visiting, during their time apart.

7. In any event, within a year of me starting fencing, my sexual orientation had become ordinary knowledge amongst himself and the fencers he coached during my university years. Throughout my university years, I was also an active member of the campus LGBT Pride Centre. At the time, the location of the Pride Centre was quite literally next door to the Music Room on the second floor of the same campus building. Many members of our fencing club went to the Music Room between classes, including Dina and Irene Enright, another member of the varsity team, and I know that people saw me going from one room to the other. In an entry in my fencing journal dated February 14, 1997, and another entry a week later, I describe coming out as gay to Irene.
8. It was certainly known to his wife Dina; my sexual orientation and my relationships with women were referenced often in the course of our email correspondence over the years – before, after, and during the time of their marriage.

### Apsimon and Dina Vitale

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.
  
10. My information concerning her pregnancy comes from Dina. We had talked about her decision to go for the abortion before it happened, and she told me about the procedure afterwards. It occurred while we were both still in university – to the best of my recollection in our second year, at least a couple of years before their marriage. I believe what she has told me. It may be that, due to the uncertain nature of her relationship with him at the time, she chose to end the pregnancy without telling him. Over the course of our close friendship, Dina shared personal details with me that I do not believe Mr Apsimon knew about, and the abortion could well have been just another secret among those that she had confided in me.
  
11. I would agree that Mr Apsimon's relationship with Dina was to all appearances consensual, as he states in paragraph 27, and I do not suggest that his relationship with Marijo was otherwise. However, a consensual relationship in the context of a coach-athlete or instructor-student relationship is a problematic

thing, one in which the power dynamic complicates the validity of apparent mutual consent. Both women were members of the varsity team, at which Mr Apsimon acknowledges he played a coaching role. The nature of that kind of relationship, and the impact it has on other athletes such as myself who are outsiders to it, is one of the issues at the heart of the SLAPP motion that I am bringing.

12. It is incorrect, and gratuitously insulting, for Mr Apsimon to say that my online following and fanbase comes from my having been a member of the Heritage Front. My experience in having helped end the organization decades ago is a significant aspect of my life, but is only one aspect of my career. Many of my followers are aspiring writers and artists who decided to follow me because of my publications and interviews on the publishing industry. I am known as a self-publishing advocate and have given several [interviews](#) on the subject; in 2012 I published a memoir about my experiences in the publishing industry, titled [Alice in Writerland](#), which drew numerous fans to my social media pages.

13. Other followers know me because of my advocacy work in the LGBT community. In 2018 I was a speaker for EGALE Canada's 2-day national conference. In 2019, I was flown to Wellington, New Zealand to speak at the week-long biennial conference of ILGA (International Lesbian and Gay Association), the world's

largest and most recognizable LGBT organization. I made connections with persons and advocacy groups from all over the world, many of whom currently follow me on social media.

Mr Apsimon was a coach who trained University of Ottawa students

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.

20. Attached as Exhibit B is the cover and two pages (38-39) from *Running with Swords*, the published memoir of [Sherraine MacKay \(née Schalm\)](#), a world-class Canadian fencer and Olympian whose time at the University of Ottawa overlapped with mine. In this 2005 memoir, she describes Paul Apsimon as the "assistant coach" at the University of Ottawa.

21. Like me, Sherraine recalls only two principal coaches at the University of Ottawa, Manuel Guittet and Paul Apsimon. I did not find references in her memoir to her being coached by Thalie Trambly. Sherraine's description of how a lot of our cross-training took place at the pub after fencing training is one aspect of how training and socialization, particularly involving alcohol, bled together under Mr Apsimon's tutelage.

22. At paragraphs 41 and 42, Mr Apsimon complains about two blog posts I wrote in 2008 and 2012, respectively, stating that they contain "several inaccuracies". His statement is in contradiction with an email I received from Sherraine on February

1, 2021, in which she praises me for my “wisdom” and “wise truth”. Not only does she not correct me on any “inaccuracies”, but she describes my analysis of the situation as “spot-on”.

23. As she wrote to me,

Hello Elisa, I had the joy and luck of coming across your blog that you had written about my Olympic fencing performance back in 2008 (I was googling my name + blog to find a link I needed to use for a job application and voila... your blog appeared). I had not read it before today, which is a shame. It would have been especially useful around the 2008 Olympics... and I would like to compliment you on your wisdom. Your analysis of the situation was spot on, your advice was golden and your empathy came through clearly. You are a wonderful writer and, it seems, an even more wonderful person. I am deeply grateful to have read your words and just wanted to say thank you for sharing them.

24. As her message included many personal details, I have chosen not to make it part of the court record in this affidavit, but can show the full message to the plaintiff or the court on request.

#### My activities as a competitive fencer

25. Mr Apsimon’s dispute in paragraph 40e about my description of the size of the varsity fencing team is arguing semantics. His numbers encompass all members of the teams in all weapons classes – foil, épée and sabre. Dividing up the team by weapon and gender, his numbers indicate that the Women’s Foil varsity team would consist of about 4 members; my own statement that it consisted of 3 or 4

was accurate. In the sport of fencing, a "team" consists of 3 athletes and 1 alternate, totalling 4 members.

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.

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 in paragraph 15, 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.
29. However, contrary to paragraph 29 of his affidavit, I was far from a “recreational” or “non-competitive athlete.”
30. I have chosen in what follows to give a detailed, blow-by-blow account of my growth and evolution as a fencer during those years, using my contemporaneous diary entries to convey my feelings and impressions as a young and developing athlete, as I know no other way of demonstrating the wrongness of Mr Apsimon’s contentions.
31. Attached as Exhibit C is a copy of the cover and various pages from my “Fencing Passport” issued by the Canadian Fencing Federation, issued October 1996, recording some of the meets in which I competed during the 1996-97 school years, including the “ApSimon Invitational”, where I placed first out of 20. As a guide to the abbreviations used, “WF” indicates a women’s foil competition, while “FF” is the French equivalent, *fleuret féminin*.

32. The inequities with respect to Mr Apsimon's coaching attention were obvious. I fenced against Dina and beat her in competition despite the obvious inequality between us; she received the benefit of Mr Apsimon's personal coaching attention and a spot on the varsity team, while he largely ignored me.
33. A clear indicator of my competitive fencer status is the fact that I competed in what are called "Open competitions ", which are ones that only athletes who aim to get national ranking participate in. Non-competitive fencers rarely participate in open competitions because of the expense and effort involved.
34. I started fencing in the fall of 1995, right after starting university at the University of Ottawa. By January 1996 it was evident that I was planning to fence competitively. My journal entry for January 2, 1996 shows that in January 1996 I bought most of my fencing equipment – a serious financial commitment at a time when I had very little money, an investment showing that I was serious about competitions and intended to eventually travel internationally. Non-competitive track beginners who signed up for fencing courses had all equipment supplied to them by the university, during practice. Only those who planned on traveling to competitions and becoming serious in the sport were encouraged by our coaches to buy their own equipment. I wrote:

"I bought some more fencing equipment last week, bringing the total spent so far to just over four hundred dollars. I have a glove (\$35), pants (\$80), body cord (\$33), foil (\$78), and bag (190). Plus tax. I love my bag (an All-Star original), but it was so expensive, and it's quite large – almost as big as me, Ron joked. At least it has wheels, so I could drag it when the weather's better or I get tired. It's red and white (Canada's colours for when I go international) and just beautiful."

35. By the end of January 1996, I arranged to move to the University of Ottawa campus so I could dedicate more hours to my fencing training. In a January 28, 1996 journal entry, I write:

"I'm moving into Residence. Things have been so incredibly strained [with my roommate] that it was no surprise when the news came. Fencing kept me at practice till 11:00, and by the time I get home it's usually quarter to midnight. I go to school early (about nine), and stay until fencing's done. On weekends we either go to the [Apsimon] cottage, competitions, or simply rest. I catch up on schoolwork then. My chores have fallen behind. I mean to do them, but I can't. I'm exhausted, and it takes me a week to complete them. Julie doesn't understand. She's constantly on my back about them, about how fencing's changing me. I really don't have the time and patience to listen to her, to hang out like we used to. It's driven us apart."

36. In a March 1996, entry, I write: "Fencing is my life. I can't express how glad I am to have stuck it out so far. From here on there are no ways out. Everything is within reach. Irene won the best athlete of the year award – the first ever for a female fencer. [...] I want to be like her, just like her – in the next 5 yrs."

37. In a July 3, 1996 entry, I describe a Romanian-born fencer I admired: "Manu said

the other night that Lavinia uses her moves sparingly. "She doesn't use more moves than she has to" – so she's very good. She's such a bold, aggressive fencer – I want to take her style. [...] If Lavinia can make the national team in 7 yrs (she's fenced 3 ½ in Romania – Brasov – and 3 ½ here) there's no reason I can't. and if I didn't make it by the time I'm 30, it's time to re-examine my priorities."

38. In October 1996, I write: "London 7:45 AM - Irene said it's no more wrong for me to go to Carleton than for their fencers to come to our club – it's not. Because of her pep talk I decided to come here after all. I mean, if I have to fence Open, I might as well go to (almost – I missed one) all of them, so's to improve my ranking." On October 13, I write:

"I know everyone says I "did well" – prefixed to the qualifier "considering it was your first Open" – but I don't really think so. 8/11 isn't good enough, considering I can do better, and I know it. I won the most bouts in a competition – 4. At the last AAA, I won 2 out of the pools. At least I'm on an upward scale, unlike Kira, who always ranks last. [...] Queens – 6th out of 28 after 2 pools. In first bout, lost 2 or 3, won 4 (or 5?). in 2nd pool, lost to George, but won all the others. First D.E. – won 15-1."

39. In many journal entries, I express frustration at Paul's lack of coaching. These entries serve as a good example for how I unquestioningly viewed Apsimon as my coach, and how seldom he gave me any useful feedback or coaching. In a July 1996 journal entry, I write:



"You know, I really wish someone would tell me how I'm doing – my good and bad points. I just need some encouragement. I know the counterpoints – it would go to my head, fill me up with unnecessary and premature expectations...but still. I've always been a better than average beginner – now my goals are set on being a better than average fencer. And I am telling you right now, on this day of July 1996, that I WILL make the national team in the next 10 years. If it kills me."

40. My fencing journal entry of Sept 1996, expresses my frustration at the overt favouritism that resulted in me being under-coached:

"The only difference between me and an advanced fencer like Irene is the length of time we've fenced, and the amount of competitive experience. I have all my own equipment, I help out, I work out, I'm always one of the first to arrive at the gym and one of the last to leave – and I never miss practice. I've done everything humanly possible – and I simply couldn't have done more in the past year. I fit all the criteria set out in the club's outline for an "A" fencer (it doesn't have any stipulations requiring a certain length of fencing experience), so why should I be relegated to a "C" or "intermediate" level? (when Dina is not)."

41. After only a year and a half of fencing, I had already received my Level One coaching certificate and I occasionally stepped in to assist another newly-minted fencing coach as she taught beginner classes.

42. By this time I was training at both Ottawa and Carleton University because I couldn't get regular coaching at my own school. In addition to the competitions listed on the passport, I was also taking part in more informal club-against-club competitions and training 4-5 days per week, while maintaining a 9.0 GPA and

my merit scholarship. On September 14, 1996, I write in my journal:

"Reasons for fencing at Carleton:

- I'm not getting any feedback on my progress from Ottawa U coaches
- Rampant favouritism (some get too much attention, others not enough)
- Divisive structure system
- No one-on-one attention at all
- No encouragement from coaches
- Feel I'm not getting enough training & lessons to progress

If I fence six times a week, I may:

- Improve a lot faster & beat their "little darling"
- Finally get noticed by EXO coaches
- Fail all my courses (Note: you MUST start a strict scheduling study program!!!!)"

43. Mr Apsimon's statement at paragraph 32 that "Hategan was a lower-level fencer.

While she partook in competitions, her abilities would not have allowed her to compete at a higher lever (sic)" is a boldfaced lie. So is his Paragraph 38: "Dina was a competitive fencer, while Hategan was not. Any difference in treatment they received was solely due to this fact." It is surprising and disappointing to read statements that can so easily be defeated by contemporaneous and material evidence.

44. The majority of my fencing journals, encompassing 3 notebooks, consists of me writing about competitions and how much I wanted to go "all the way" to the Olympics. Almost every page describes my struggles to make up years of training within a short span of time. And my results prove that I had aptitude and a

talent for fencing – something that Mr Apsimon would readily diminish or deny, as justification for why he did not devote nearly as much time and effort to training me, as opposed to training the women he was sleeping with at that time – who were my direct competitors.

45. I believe that Mr Apsimon's status as boyfriend and former boyfriend, respectively, of two women competing with me for a spot on the varsity team placed him in a direct conflict of interest position – and I suffered as a result. In an April 1996 journal entry, I write:

I feel like Paul is holding me responsible for eliminating Dina for the Top 8 position (we were # 9 & 8 out of 11, and only 8 would go on to the next D.E. [Direct Elimination round]. She was so horrible on piste, even I was convinced she lost to me on purpose – but then again, she was worse than even me today. So why can't it be convincible [sic] that I could win a D.E. bout against her?? He was so sure, he went straight up to her (even though I was there, sitting right next to her), and said only to her: "If you guys don't want to fence each other, just let me know / why bother?" Instantly assuming that she did it on purpose, that I could never have enough skill to beat her.

And when I tried explaining what happened in my next DE bout – how the other girl kept changing lines, etc, and I caught on too late for a comeback, he simply said "Yep, she hit you." That's all. After I was so pleased for someone at my level – it all came crashing down. I felt nothing I did today was worth anything – I felt so bad. Why can't he ever say anything nice, or even half-decent, to me?

Why is it so inconceivable that I could do as well, or even better, than Dina? And although I KNOW she's had a bad day, why does Paul think that the only way I could ever do better than her is because of a lousy day on her part?! Why is it so hard to accept that I could have, on my own, done better and improved?

Why am I supposed to always rank behind her, and if I don't, why does Paul have to be convinced that it wasn't due to my increased skill, but her faulty

and decreased performance?!?!?!?

And up 'til now, I thought it had been a really good day, that I had proved myself. I guess some things never change – I guess some coaches never do, either.”

46. Despite Mr Apsimon’s favouritism working against me, I was determined to work even harder. A March 12, 1996 journal entry shows I was improving despite being under-coached:

“Last night Manuel said to me: “You’re getting better and better all the time.” And I am. I’ve won the last 3 bouts / matches in a row with both Emmanuelle (though tonight I lost by 1) and Yves, the jerk. And Dina called our bout “awesome”. I almost beat her – 7 (or 8) to 10!” [...] I should be a shoo-in to replace George’s spot on the varsity team.”

47. Two weeks later, I defeated Irene Enright, the highest-ranked female foilist in our club and one of the top female fencers in Canada at the time. I wrote about the win in a March 26, 1996 journal entry:

“I beat Irene last night! Why do I feel so weird inside? Shock, probably. It’s such a funny feeling – I’ve been doing mediocre all evening, and then...one touch after the other, unbelievable. And whenever she managed to get a hit, it was either a no available or simultaneous. [...] I beat Irene. After just 7 months of training. And she’s in the top 20 in Canada. At the provincials she was second. And I beat her 15 – to not much!”

48. By April 1996, I was starting to get consistently positive feedback from coach Guittet and Irene Enright. On April 8, I wrote:

"Last week of school!!!! Irene told me something extraordinary last week and I've been meaning to put it in here ever since. Manuel told her I was "good, but too competitive." GOOD!!!! and this coming from an Olympic coach! He's never told me that about my overall performance – so as not to fill my head, I can understand that. And Irene said that she was watching me fence, and she started thinking "She moves like a real fencer now!" You can't imagine how much this means to me. it's really coming, I can feel it, and I get shivers just thinking about it. it's really happening. [...] I confessed my secret attitude to Irene – I want medals. I do – I admitted it to myself, as well. Until then I'll always think I'm a lousy fencer – until I have the proof to the opposite. She snorted a bit, smiled and said "It won't be long, the way you're going/fencing."

49. I continued to be hard on myself, thinking that if I could just win competitions, I too could become "one of the favourites". In an April 22, 1996 journal entry, I write:

"If fencing means and is everything to you, then give it your everything. No less than 100%. There's no excuse for not coming in in the top 3 at Thursday's tournament. There's no excuse for not being 1st. If, after all these intense months, it doesn't pay off, it's time to reexamine everything. I swear, the next time I write an entry in this journal, I will have won a medal." [...] April 26, 1996: "I won a medal last night."

50. What I did not realize then, or perhaps I was too young and naïve to understand, was that my rapid improvement and winning placed me in direct trajectory to Apsimon's competitive ambitions for his girlfriend Dina and Marijo. The more I beat them in competition, the more Apsimon appeared to be upset with me, and the more Guittet ignored me. I tracked the correlation in at least two journal

entries:

*January 22, 1997:* Paul once used Mojo [nickname for Marijo Cyr] as a point of evaluating if fencers were good (as with Lori – when I asked him if she was good, he replied “Well, she beat Mojo!” Last month, I beat Mojo 5-4. Last week it was 5-2. Tonight I beat her 5-0, and this was after she refused to fence a challenge bout with me (Sherraine says I automatically win if not fenced after a week from the date the challenge was issued). So what does that say about me, Paul?”

*March 31, 1997:* “Lots has happened since my last entry. After overexerting myself last term in a last-ditch effort to catch up and catch Manu’s eye. To no avail. [...] Mojo [Paul’s ex-girlfriend] telling other girls behind my back that she didn’t like fencing me – only since I started constantly beating her. = it appears that the more threatening, the more hated. Girls only liking you when you’re subordinate to them, weaker athletes, more inferior fencers. Girls full of fake smiles and superior tones, only able to be attentive when they win – and it doesn’t take a blind man to confuse consideration for condescension...”

51. I was not the only person who suffered as a result of coach favouritism. In a January 16, 1996 journal entry, I address the fact that Dina, a beginner, was added to the varsity team instead of Marie-Helene, a senior fencer who had fenced for two years, was far better technically than Dina, and had a track record of winning in competition. Understandably, Marie-Helene became extremely upset after being inexplicably left off the varsity team in favour of a beginner who would soon date the assistant coach:

“I’ve just got through talking with Kira (she’s nicer all of a sudden). She straightened out the details of what happened last night. Anyway, although I don’t like Marie-Helene, I can see the unfairness of the whole situation. Dina got on the varsity team, and MH didn’t. God. It seems like Manu has favourites. I want to be on the team so badly my chest aches. The maximum time on the circuit is five years – that is, after five years you can’t be on the

varsity team anymore, so it's just as well that I haven't qualified this year. But I will for sure – by next yr. If it kills me. the maximum are 8 people per weapon. There are about twelve of us regular women's foilists. But if I don't make it on the team next year, I'll just die. So this year will be spent purely on improvement."

52. Amidst all the frustration I express in my journals over not being one of the

"favourites", I also describe the negative effect such favouritism had on the

"favoured". After Dina repeatedly confessed to me that she wanted to quit

fencing but felt that she couldn't due to Paul and Manu's pressure, I wrote this

January 5, 1997 entry:

"Why do coaches do this, I wonder. Decide right away who's worth their time and who isn't? I've just realized that Dina's on the opposite end of the same coin. They (the coaches), because of the way they feel about her – Paul, romantically, Manu paternally – expect so much that it puts undue weight and pressure on her shoulders to perform to their expectations. I see how this affects her much more clearly than even she does. Nowadays, and twice in the last month, when things haven't gone her way – that is, if she couldn't perform something the way she thought she should (her expectations being so unrealistic for a relative beginner, and no one to tell her that), she just quits altogether. As always, Paul picked her & Irene for lessons (although I am due for 2, he doesn't even look my way), and she for no reason started crying.

Of course, Paul was understanding after she came back into the gym. If I ever pulled that stunt, what would you bet I'd get a lecture, or at the very least, not get another opportunity to get the lesson?! I'll wager anything that at practice tomorrow she'll be first on the lesson list.

The other time she flipped out was when EXO scheduled a mock competition with the RA. She quit after 1 bout (because "the fencing didn't feel right, she wasn't doing anything", etc). Manu gave her a 1 hr-long (I timed it!) pep talk in the hallway. For nothing! Meanwhile, just like the previous weekend, at an open tournament at Ryerson, I was ignored altogether and treated like a stranger, when I was encountering far greater difficulties. So, during an open circuit competition Manu looks the other way when I'm crying & continues to

sit on the bench and cheer on the other 3 EXO girls competing (none of whom needed a coach at the time because they were doing well). But when something doesn't work out in Dina's evening at practice, he has to coddle her for an hour. He puts too much pressure on her and fills her head with unrealistic expectations for her level, while no one puts any pressure on me – in fact, they hope I'll quietly go away."

53. Ultimately, I had to quit fencing – not because I was not good enough to compete on a national level, but in significant part for financial reasons. Without the support of the University of Ottawa or a supportive family, I could not afford the expense of fencing competitively, or paying for un-subsidized lessons. In order to gain the national ranking I would need to qualify for athletic scholarships or corporate sponsorships, I would have to compete in the "Open" circuit, which involves travel to competitions across the province and country. I could not afford the travel costs to attend national and inter-provincial meets on my own, the entrance fees, and the equipment required. And once I obtained that ranking, international travel was a must – something prohibitively expensive for someone without any familial support.

54. At the time, I was between ages 20-22 and dependent on student loans and merit scholarships, along with working two part-time jobs, to pay for my university tuition and living expenses. I had no supportive family who could fund the costs of travel and accommodations; nor did I have sympathetic coaches willing to train me at little to no cost – the way Apsimon was training Dina during



the time they were lovers. The fact that Dina came from an upper-middle class family who could have easily afforded to pay for her lessons, while I struggled financially, was not a factor considered by Apsimon when he decided to allocate his coaching time on women he was intimately involved with.

55. I also couldn't obtain free or subsidized coaching from the Carleton University coaches who allowed me to train with their team, because I was not a student there. When it comes to sports, particularly those that involve expensive specialty equipment and highly-technical coaching, it is a sad reality that a lack of finances, rather than a lack of natural aptitude, is often the biggest barrier to low-income or disadvantaged young people.

56. On November 6, 1996, my journal records the events of an intercollegiate competition where I fenced with Carleton University to defeat the University of Ottawa team. We came in second in a team competition against all other university clubs in Ontario. I considered this a personal victory and the highlight of my fencing career. I want to include this lengthy entry into this affidavit, because it is a snapshot in time of who I was at age 21: a young woman disadvantaged socio-economically and lacking the opportunity to realize a dream. But in this one moment, I showed Paul Apsimon who I was, and he could not look away or deny my aptitude:

"We came in second in Kingston. To do that, we eliminated Ottawa C (comprised of George, Emmanuelle, Kira, and Helene) 45-24. We were in turn eliminated by Ottawa A – the team I was originally supposed to be on (Mojo, MH, Linda and April). I have no regrets. For the first time, my fencing shed light on what I really felt – I would have fenced with anyone other than Ottawa in order to beat Ottawa. It was an incredibly therapeutic experience. [...] For the first time ever, I knew the meaning of team spirit – to back up your teammates & be backed up 100%. To have absolute confidence in their abilities and be able to focus only on your own fencing. [...]

It was so incredible to be able to freely cheer against Ottawa U. They stood for everything bad that I've felt for the past year. I was repaying every injustice, every tear, every painful feeling I've so often felt in the last year in my bouts against Ottawa U. [...]

At the moment Ottawa C's bout was ending against York (I think), and I realized we'd have to fence them, I panicked. Sean [Carleton's assistant coach] told me to take a walk with him. He took me by the shoulders and we left the gym, walking down the long corridor of the near-empty RMC workout room. He told me to just relax and fence, like I'd been doing all along. My job was to keep it going and fight, and leave room for Katya to come in and do the work.

Ottawa C fencers were like any others – they probably wanted to fence us as much as we wanted to meet them on piste. But really I had no choice. We were fencing for the silver, and either & whichever way we went, we were bound to encounter Ottawa. We were trapped from all directions – so quitting by freaking out was not an option. If we lost, we'd have to fence Ottawa B for third. If we won this one, Ottawa A awaited us. So we had to buckle down – we'd known all along that we'd run into them – and the moment had come.

We had to recollect ourselves, forget all past encounters, and fence them as we would strangers. Point by point – was the motto. Once the mask goes on, they're just fencers, just stranger opponents, and it's all a chess match for the win.

I breathed (Sean told me to) deeply, reminding myself that oxygen wasn't a bad idea, and once I closed my eyes a few times, relaxed at Sean's presence, I decided I was together enough to re-enter the gym. As we walked back, Sean's comforting presence beside me all the way, I ran into Paul. I didn't address him at all – he was an enemy that day, save for the time he found my glove.

Tammy fenced Emmanuelle first and beat her 5-0. It set the fateful pace. Katya fenced Kira, and after getting another 5 freebies, she acknowledged her surprise at just how exactly as I described Kira's attacks had been. I made sure both my teammates were well-briefed on just how predictable & easy to hit she was, enacting her counterattacks in the very same way she attempted to do them. I told them she'd come in & fight low, then go high, arching her back and trying to catch one by her line before they even got close. A classic counterattack – which practically served no purpose for Kira, in that she's always been beaten.

Tammy beat her 5-0 as well. I got on with Emmanuelle (my only real challenge in that match), and she scored two for my every point. I could tell just how much I'd surprised her – she'd (they'd all) expected to catch us, even take the lead. It was the closest they'd ever come to us. Katya broadened the lead, and our solid points kept accumulating.

But my bout with Kira was my highlight of the whole match – perhaps of all the bouts I'd fenced. It started the moment she got on the *piste* and made the horrible mistake to smirk superiorly as George plugged her in. I repeat, BIG mistake. [...] The first point was mine. I claimed the second. The third was hers. The fight had begun. I could see that all the Ottawa girl fencers had gathered around.

Paul was in the corner of my eye. The battlefield was set. I was stubborn as a mule to make her pay. Inside her mask floated images of favouritism, Manu and Paul – I was hitting them, I was beating up the whole club, I was getting back at last, with every hard hit of my blade. My side was hollering at every point – fuelling me on. It was my battle against all those who'd hurt me at Ottawa.

The fencing itself deteriorated to the point where Kira was unwilling to let me attack anymore, and I would not give an inch. We were two dogs snapping for survival. Anyone who watched knew it was much more – after all Kira had done to me (and to others) in the past year, I was paying her back. Point by point, for every tear she'd milked out of me.

She rushed at me, and I rushed at her, and we collided. “*No valable! Halt!*” yelled the judge. Dina later described the whole scenario as ‘pathetic’. After the day was over, George came up to me and said, “You hate me, don’t you?” and admitted she saw it was much more, especially with Kira.

The moment the judge said “*Allé!*”, Kira's point rushed into my bib as I tripped over her feet, stepping on her feet, and ready to send her (and she, myself)

to the ground. I heard people murmuring and starting to talk as even the judge clicked her tongue and saw we were fighting by means of the bout.

I beat her 5-2 or 3, and screamed out every point, as she shook her head. I've always looked down on Guerly Cadet and Jodie Marr for screaming as they hit, but I honestly could not have contained it if I tried. It's only against the Ottawa teams that I've ever screamed. It was so therapeutic - all my pain and anger rushing forth toward my competitor, my enemy, my clubmate.

In the end, as Tammy unhooked me from the reel, I jumped into one of our supporters' arms. Then Sean just hugged me fiercely. I was so happy! I'd gotten back not only the points I'd lost to Emmanuelle, but my pride as well. I'd showed all those EXO losers that I could beat them at their own game.

Paul went over and called Sean over to him, telling him to tell his teammates to tone it down – their fiercely loud screaming at every point. He didn't want to create an enemy atmosphere – a "hostility" = between our clubs. I laughed when Sean told me. So Ottawa felt intimidated. Hated, even. Well, that was good. Because I hated them."

57. My dream to succeed in fencing ended for two reasons – because I didn't have the financial support and means to buy my way into an expensive elite sport, and because of unfair treatment by coaches like Paul Apsimon – coaches who hold within their grasp the power to make or destroy dreams. It is because of coaches like these that I wrote my Substack article – so that hopefully it will make a difference for other girls in the future.

58. I have presented all the emotions I felt then, raw as they were in the moment, to demonstrate the impact that bad coaching and favouritism can have on athletes who are young and pushing themselves to the extremes of their body and spirit

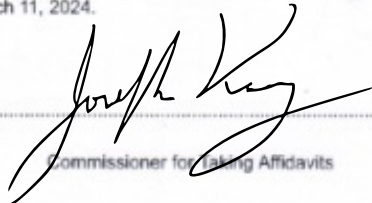
and especially vulnerable because of it. My experiences are far from unique, and I wrote my articles so that more would understand them.

59. Copies of the pages from my fencing diary that I have quoted above are attached as Exhibit D.

amendments

60. In paragraphs 74-77 of his affidavit, Mr ApSimon has given an incomplete and therefore misleading description of my position on his proposed pleadings amendments. I will make submissions on the proposed amendments if or when the matter comes before the court.

Sworn before me remotely over zoom conference at  
the City of Toronto in the Province of Ontario, on  
March 11, 2024.

  
-----  
Commissioner for Taking Affidavits

  
-----  
Alisa Hategan

---

**ApSimon v. Hategan, SLAPP motion**

---

**Joseph Kary** <josephkary@gmail.com>  
To: Jeff Saikaley <JSaikaley@plaideurs.ca>  
Bcc: elisa <elisa@elisahategan.com>

22 January 2024 at 14:17

Dear Mr Saikaley,

We have not received any responding motions materials from you, nor have we received any request from you to extend the deadline for serving them. At this point in time, if I do obtain instructions to consent to an extension it would almost certainly be on condition that the timetable be amended correspondingly.

Your absence is bewildering. Please advise as to your intentions.

Yours truly,

Joseph Kary

**This is Exhibit A to the affidavit of E Hategan,  
sworn March 11, 2024**



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## ApSimon v. Hategan, SLAPP motion

---

**Jeff Saikaley** <JSaikaley@plaideurs.ca>  
To: Joseph Kary <josephkary@gmail.com>  
Cc: Albert Brunet <ABrunet@plaideurs.ca>

22 January 2024 at 14:29

Mr. Kary,

Thank you for your email.

I apologize for the delay. We will have our responding material to you shortly. We had planned on notifying you of the delay, but due to urgent matters on other files, it unfortunately slipped through the cracks. We will of course amend the timetable accordingly. We will get back to you in a few days with an update on when we expect to serve you with our materials and a proposed amended timetable for your consideration.

Thank you.  
Jeff

**Jeff Saikaley**  
Associé / Partner

Caza Saikaley srl/LLP  
Suite 1420 - 220 rue Laurier Avenue ouest/West  
Ottawa, ON K1P 5Z9

T: 613-564-8268



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-----Original Message-----

From: Joseph Kary <josephkary@gmail.com>  
Sent: Monday, January 22, 2024 2:18 PM  
To: Jeff Saikaley <JSaikaley@plaideurs.ca>  
Subject: ApSimon v. Hategan, SLAPP motion

External Email – Confirm Sender and Beware of Links and Attachments

[Quoted text hidden]

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**Re: Hategan, SLAPP motion**

---

**Joseph Kary** <josephkary@gmail.com>  
To: Jeff Saikaley <JSaikaley@plaideurs.ca>  
Bcc: elisa <elisa@elisahategan.com>

12 February 2024 at 12:21

Dear Mr Saikaley,

Your silence continues to bewilder.

As the time in which cross-examinations were to take place has passed, I take it that you do not intend to cross-examine my client on her affidavit. In any event, you have forfeited the right to do so.

Yours truly,

Joseph Kary



---

**RE: Hategan, SLAPP motion [CAZA-2588]**

---

**Albert Brunet** <ABrunet@plaideurs.ca>  
To: "josephkary@gmail.com" <josephkary@gmail.com>  
Cc: Jeff Saikaley <JSaikaley@plaideurs.ca>

12 February 2024 at 12:28

Hi Mr. Kary,

We apologize for the delay. Mr. Saikaley has been involved with a trial and I have been on paternity leave. I am trying to line things up so that we have our client's affidavit to you this week without any further delay.

The position set out in your email is incorrect on both fronts. We intend to cross-examine your client. We have not forfeited the right to do so.

This is your client's anti-SLAPP motion. I would think your client's position is that she wants the motion to proceed on March 27, 2024. I would therefore ask that we work together to revise a timetable that gets us to the March 27, 2024 date. I appreciate that some of our deadlines (for example, a responding factum), may have to be shorter than anticipated given the delay in getting your our client's materials.

Perhaps it would be constructive to find dates for the cross-examinations (as those had not been set). What are your availabilities starting February 26, 2024?

Regards,

Albert

**Albert Brunet**  
Avocat / Lawyer

Caza Saikaley srl/LLP  
Suite 1420 - 220 rue Laurier Avenue ouest/West  
Ottawa, ON K1P 5Z9

T: 613-564-8281



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-----Original Message-----

From: Jeff Saikaley <JSaikaley@plaideurs.ca>  
Sent: Monday, February 12, 2024 12:23 PM  
To: Albert Brunet <ABrunet@plaideurs.ca>  
Subject: FW: Hategan, SLAPP motion

-----Original Message-----

From: Joseph Kary <[josephkary@gmail.com](mailto:josephkary@gmail.com)>

Sent: Monday, February 12, 2024 12:22 PM

To: Jeff Saikaley <[JSaikaley@plaideurs.ca](mailto:JSaikaley@plaideurs.ca)>

Subject: Re: Hategan, SLAPP motion

External Email – Confirm Sender and Beware of Links and Attachments

Dear Mr Saikaley,

Your silence continues to bewilder.

As the time in which cross-examinations were to take place has passed, I take it that you do not intend to cross-examine my client on her affidavit. In any event, you have forfeited the right to do so.

Yours truly,

Joseph Kary

---

**RE: Hategan, SLAPP motion [CAZA-2588]**

---

**Albert Brunet** <ABrunet@plaideurs.ca>  
To: "josephkary@gmail.com" <josephkary@gmail.com>  
Cc: Jeff Saikaley <JSaikaley@plaideurs.ca>

19 February 2024 at 16:39

Please find attached the affidavit of Mr. ApSimon, served pursuant to the Rules.

We look forward to hearing from you with respect to cross-examinations so that these can be booked as soon as possible, further to the request in my email, below.

-----Original Message-----

From: Albert Brunet  
Sent: Monday, February 12, 2024 12:29 PM  
To: josephkary@gmail.com  
Cc: Jeff Saikaley <JSaikaley@plaideurs.ca>  
Subject: RE: Hategan, SLAPP motion [CAZA-2588]

Hi Mr. Kary,

We apologize for the delay. Mr. Saikaley has been involved with a trial and I have been on paternity leave. I am trying to line things up so that we have our client's affidavit to you this week without any further delay.

The position set out in your email is incorrect on both fronts. We intend to cross-examine your client. We have not forfeited the right to do so.

This is your client's anti-SLAPP motion. I would think your client's position is that she wants the motion to proceed on March 27, 2024. I would therefore ask that we work together to revise a timetable that gets us to the March 27, 2024 date. I appreciate that some of our deadlines (for example, a responding factum), may have to be shorter than anticipated given the delay in getting your our client's materials.

Perhaps it would be constructive to find dates for the cross-examinations (as those had not been set). What are your availabilities starting February 26, 2024?

Regards,

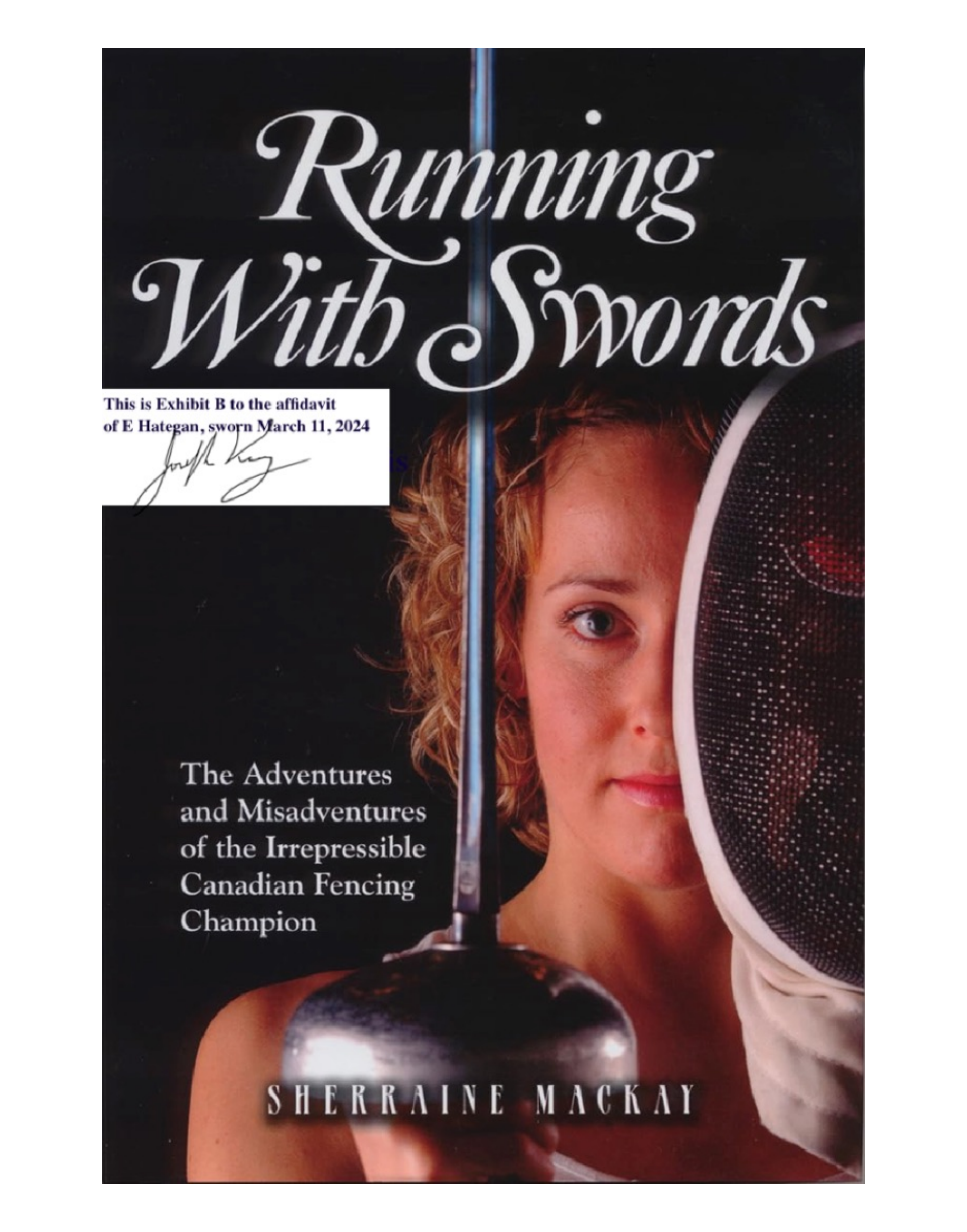
Albert

[Quoted text hidden]

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 **2024-02-19 Affidavit of Paul ApSimon Sworn.pdf**  
29295K

# Running With Swords

A close-up photograph of a woman with curly hair, wearing a fencing mask and holding a sword. The sword's blade is vertical, passing through the center of the frame. The woman's face is partially visible through the mesh of the mask.

This is Exhibit B to the affidavit  
of E Hategan, sworn March 11, 2024

*Joseph King*

The Adventures  
and Misadventures  
of the Irrepressible  
Canadian Fencing  
Champion

S H E R R A I N E M A C K A Y



them—ha ha! See ya at supper!” We scurried off around the corner before breaking out into laughter, partly at ourselves and partly at her.

As with most international travel, by the time the trip came to an end we were ready to get home where we could understand the locals and drink the tap water. Thankfully, on the return trip there was no eight-hour taxi ride. We exchanged that little inconvenience for three days shut up in our Miami hotel room watching reruns of the *Golden Girls*. The hurricane that had met us on the way down to South America had followed us back north and we were trapped in Miami. We amused ourselves by cracking open and eating the coconuts that had been blown off the palm trees and left by the hotel’s pool ... which, by the way, was not even one Copacabana away from our room.



Even considering that Colombian trip, travelling was pretty easy as a junior. It was more intense as I became better at fencing and entered university in 1993 when I was 18. When I was getting ready to leave Brooks to go to university, Mr. Nelson talked to my parents and said that he knew of a great coach in Ottawa: someone who was a fencing master, a former Olympic coach, and above all, a very respectable man. By then I had already been accepted at the University of Alberta, chosen my courses and found an apartment. But father Oz came through again. If there was a better option for one of his children in pursuing sports, Oswald was not going to pass it up, and to be honest, neither was I.

Within two weeks I had been accepted at the University of Ottawa. We talked to the coach and I bought a one-way plane ticket to Ottawa where I started my real education. Outside of swordplay, I wasn’t really clear on a career path, so I took courses in Shakespeare’s works, molecular biology and European history, trying to get a taste of everything that interested me. My decision to do Teachers’ College came much later (in 2000). The biggest

sacrifice in changing schools was the time spent with friends and family—Dad received a whopping five-hundred-dollar phone bill after my first month on my own in Ottawa. After a few months of adjustment, getting my BA was a blast. I made a lot of great friends from the fencing club, my classes and church; I came to love a new city; and eventually met my husband there.

My studies naturally involved a lot of cross-training, under the tutelage of Paul ApSimon, the assistant coach at the time. Most of this took place in a pub after the fencing training. First of all I had to learn to play billiards to improve the extension of my fencing arm. Darts was pure hand-eye coordination training, and the early-morning greasy spoon breakfasts were fuel-ups for those long bouts. It would have been challenging with all those distractions to stay on the Junior National team and also qualify for the senior team. Luckily, my new coach was everything Mr. Nelson had promised.

Manuel Guittet was an ex-pat like Mr. Nelson, but he hailed from Paris, France. He fell in love with a Québécoise journalist in 1976 and has been in Canada ever since. He speaks English, French, German, Spanish and Chinese. He is a concert pianist. He is a doctor of mathematics. He is one of the few fencing masters who can give fencing lessons with both his left and right hand to two fencers ... *at the same time*. Under his tutelage, I became delightfully unaware of whether my opponent was left- or right-handed. This is a huge advantage in fencing where many of the top girls are left-handed. There have been theories claiming that, unlike right-handers, lefties have cross-dominant vision, which gives them a keener depth perception and helps their ability in sports like fencing and tennis. There is also a theory that it is simply a numbers advantage—only in this case an advantage for the minority. It’s rare to find a left-handed fencer in your average club or competition, and as a result most fencers get used to training with and competing against right-handed opponents. When suddenly faced with a lefty, who has reversed techniques and different distance, they may not know how to handle them. So



*Joseph King*

HATEGAN

CANADIAN FENCING FEDERATION  
FÉDÉRATION CANADIENNE  
D'ESCRIME



50662 -  
FENCING PASSPORT  
PASSEPORT D'ESCRIME





# C.F.F. - F.C.E.

PHOTO

*K. Hategan*

Signature

Name  
Nom **CATRINA HATEGAN**

Address  
Adresse

City  
Ville **OTTAWA** Prov. **ONT.**

No. **50662** Original   
Reissued/Rééditer

Date of Issue  
Date d'émission **OCT 08 1996**

*Silles Pham*

Signature C.F.F. Official/Officiel F.C.E.



















Joseph King

16/1/96

I've just got through talking with Kira. (She's nicer all of a sudden). She straightened out the details of what happened last night. Anyway, although I don't like Marie-Helene, I can see the unfairness of the whole situation. Dina got on the varsity team, and MH didn't. God. It seems Monon has favourites. I want to be on the team so badly my chest aches. The maximum time on the circuit is five years - that is, after five years, you can't be on the varsity team anymore. So it's just as well that I haven't qualified this year. But I will for sure - by next yr. If it kills me. The maximum are 8 people per weapon. There are about twelve of us regular women's foilists. But if I don't make it on the team next year, I'll just die. So this year will be spent purely on improvement.

Funny - as Kira was saying - if Irene wanted to make her own brand of weapon and fence, they'd let her. Exceptions are always made for exceptional circumstances. Irene came to Ottawa U, for the sole reason of being coached by Monon - the best coach in Canada.

I want it so badly, it hurts -



April 27

If fencing means and is everything  
to you, then give it your everything.

No less than 100%.

There's no excuse for not coming in in the  
top 3 at Thursday's tournament. There's  
no excuse for not being 1st. If, after all  
these intense months, it doesn't pay off,  
it's time to reexamine everything.

I swear, the next time I write an entry  
in this journal, I will have won a  
medal.

(You're fencing for points, not bouts.  
Even one point against you is too much.  
So don't give them any!)

Apr. 26/96

I won a medal last night.



July 3/90

Mama said the other night that Lavinia uses her moves sparingly. "She doesn't use more moves than she has to" - so she's very good. She's such a bold, aggressive fencer - I want to take her style.

What other pearls of wisdom has Mama partaken with us? There are too many! But he said that you need 3 things to get far =

- good blade work
- good fencer work
- speed (i.e. agility) (I think was the 3rd)

If Lavinia can make the national team in 7 yrs (she's fenced 3 1/2 in Romania - Brasov - and 3 1/2 here), there's no reason I can't.

And if I didn't make it by the time I'm 30, it's time to re-examine my priorities.

Why is it that some people can fence for a relatively short amount of time + win world cup events, and others spend their whole lives trying + not getting past a certain point?



Fencing is my life. I can't express how glad I am to have stuck it out so far. From here on there are no ways out. Everything is within reach.

Irene won the best athlete of the year award - the first ever for a female fencer. A lot of it was politics, but she deserved every single standing ovation. I was so proud of her - she was actually crying - the first time I've actually witnessed her breaking down.

Everyone anticipated she'd get the "best female fencer" award, but she didn't even know she was nominated - it was a shock throughout.

I want to be like her, just like her in the next 5 yrs.



Apr. 8/96

Last week of school!!!!

Irene told me something extraordinary <sup>ne tid</sup> last week and I've been meaning to <sup>al3-</sup> put it in here ever since. <sup>ge</sup>

Manuel told her I was "good, but stop competing." GOOD!!!! - and this, coming from an Olympic coach! He's never told me that about my overall performance - so as not to fall my head, I can understand that.

And Irene said that she was watching me fence, and she started thinking "she moves like a real fencer now!" <sup>ily</sup>

You can't imagine how much this means to me. It's really coming, I can feel it, and I get shivers just thinking about it. It's really happening.

I've seen so many beginners move that familiar beginner way, and I've wanted to shake it off so badly. I catch myself in the dance studio, watching my reflection in the multiple mirrors. If I look like a beginner I change my stance immediately - drop lower, polish off my on guard position, etc. I just hate looking like they do - the other beginners.

Linda still looks like that. I'm far



March 12, 1996

Last night Manuel said to me - "You're<sup>4</sup> getting better and better all the time."

And I am - I've won the last 3<sup>(bouts)</sup> matches in a row w/ both Emmanuel<sup>3</sup> elle (though tonight I lost by 1) and Yves - the jerk.

And Dina called our bout "awesome" I almost beat her - 7 (or 8) to 10!

I can see a little clearer now - it's still really dense + foggy, + I'm mostly blind, but now + then I get patches of enlightenment - I can actually plan something + carry it out. These are the best times - you know you earned your point, it wasn't just luck - but your own skill.

If you can't replicate a hit, Manuel said, it's worthless, whether you got the point or not. You have to know what happened + what you did right, in order to continue progressing. Only by + through the cognitive process will you make it - At the Olympic stage, everyone's extremely skilled. What makes the difference - 99% of



the time - of is planning your strategy,  
& using your brain -

I should be a shoo-in to replace  
George's spot on the Varsity team.

March 13

Tonight is the first time in I don't



Jan. 28/96

I'm moving into Residence. Things have been so incredibly strained at home that it was no surprise when the news came.

Fencing kept me at practice till 11:00, and by the time I get home it's usually quarter to midnight. I go to school early (about nine), and stay until fencing's done. On weekends we either go to the cottage, competitions, or simply rest. I catch up on school work then. My chores have fallen behind. I mean to do them, but I can't. I'm exhausted, and takes me a week to complete them. Julie doesn't understand. She's constantly on my back about them, about how fencing's draining me. I really don't have the time or patience to listen to her, to hang out like we used to. It's driven us apart. I see it and mean to do something about it before it's too late, but never do. I am exhausted - emotionally, physically. Totally drained. I'm tired of Julie's nagging - after all she doesn't ever do this to Karen, and nowadays I'm away just as often as Karen (who lives at her boyfriend's for the better part of the week). I came home last week, completely







has with gripping a french grip. I still clutch it far too tightly - it should be smooth and light, the poories economic and elegant.

You know, I really wish someone would tell me how I'm doing - my good and bad points. I just need some encouragement. I know ~~of~~ the counterpoints - it would go to my head, fill me up with unnecessary and premature expectations... but skill... I've always been a better than average beginner - now my goals are set on being a better than average fencer. And I am telling you right now, on this day of July 1998, I will make the national team in the next 10 years. If it kills me. And I will train with the best - not just in Canada, but in Eucharist SCRIMA.

Remember what Paul & Keith said - it's not unusual to see an unknown suddenly luck out and win a medal in epée even if they don't have the skill; but that doesn't happen in foil. The only ones who succeed in foil are really



Sept. 5/96

The only difference between me + an advanced fencer like Bernie, is the length of time we've fenced, and the amount of competitive experience. I have all my own equipment, help out, I work out, I'm always one of the first to arrive at the gym and one of the last to leave - and I never miss practice. I've done everything humanly possible - and I simply couldn't have done more in the past year. I fit all the criteria set out in the club's outline for an "A" fencer (it doesn't have any stipulations requiring a certain length of fencing experience), so why should I be relegated to a "C", or "intermediate" level?



March 26, 1996

I beat Irene last night! --- why do I  
feel so weird inside? - shake, probably.  
It's such a funny feeling - I've been  
doing mediocre all evening, and then  
one touch after the other - unbelievable.  
And whenever she managed to get a  
hit, it was either a no available or  
simultaneous. We had a regular  
bout afterwards, and she won 5-1,  
and I hated her just then, cause Mami  
was presiding and I'm not sure he  
saw <sup>all</sup> my hits from before.

I beat Irene. After just 7 months  
of training. And she's in the top  
20 in Canada. At the provincials  
she was second. And I beat her 15-  
to not much... Christ!

If working out is supposed to be so  
good for you, why does my body  
hurt so much? I've got over 20  
bruises on my legs alone, and all  
my muscles and joints ache like  
hell.



that, not cross over (as seen as I do those, lose priority.) And most of all, I have to lunge (and recover). Sure I get points the way I fence, but it's not going to help me in the long run. I have to learn the moves properly. He'd rather I got fewer points but fenced cleanly. Instead of going like this: (he demonstrated

with his finger), I should go (gradually) - not peak off.

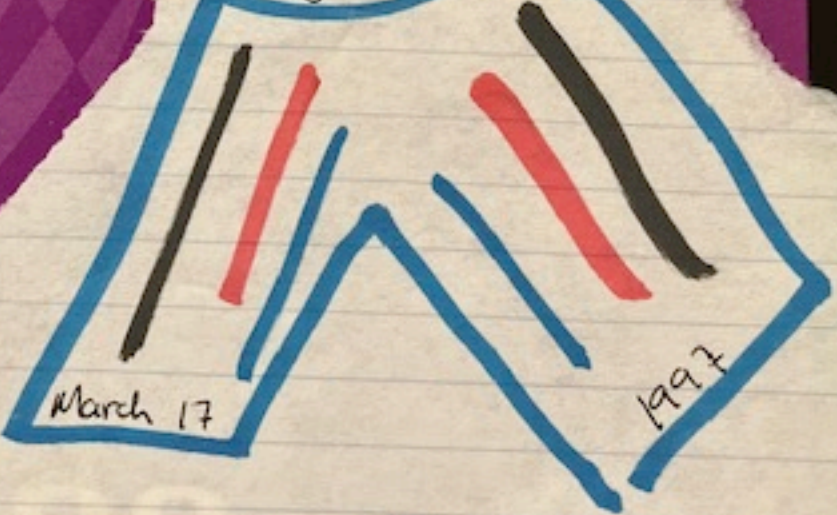
I confessed my secret attitude to bene. I want medals. I do - I admitted it to myself, as well. Until then I'll always think I'm a lousy fencer - until I have proof to the opposite. She smirked a bit, smiled and said "It won't be long, the way you're going fencing." I hope she's right, although I honestly can't envision getting a medal for anything. I've never in my life been appreciated that way, and it's beyond my wildest dreams. I'd probably get so scared of the possibility that I'll lose the final bout. But ye gods, what I wouldn't do to prove myself wrong and bene right! To have the opportunity at a later date to pick up this notebook



*filroy*

OPENING HOURS: MON-FRI 10AM-12PM

1st  
George's beginner's tournament





Drills:

- double-disengage
- double-lunge
- sixte-carre reposte
- carre-sixte reposte
- carre-septime reposte

Jan. 22/97

5-0 against Mojo

15-11 for Irene - Challenge bout (mine)

5-3 for George

5-2 for J.C.

Paul once used Mojo as a point of evaluating if fencers were good (as with Lori - when I asked him if she was good, he replied "well, she beat Mojo!")

Last month I beat Mojo 5-4, last week it was 5-2, tonight I beat her 5-0, and this was after she refused to fence a challenge bout with me (Shermaine says I automatically win if not fenced after a week from the date the challenge was issued).

So what does this say about me, Paul?



London 7:45 AM

Wren said it's no more wrong for me to go to Carleton than for their fencers to come to our club - it's not. Because of her pep talk I decided to come here after all. I mean, if I have to fence open, I might as well go to (almost - I missed one) all of them, so's to improve my ranking. So I'll try to forget everything - my fight with Dina, my exams in the past + future weeks - just everything.

I feel like Paul is holding me responsible for eliminating Dina for the top 8 position (we were # 9 + 8 out of 11, and only 8 would go on to the next D.E.) She was so horrible on piste even I was convinced she lost to me on purpose - but then again, she was worse than even me today. So why can't it be conceivable that I could win a D.E. bout against her? He was so sure he went straight up to her (even though I was there, sitting right next to her), and said only to her: "If you guys don't want to fence each other, just let me know/why"



brother?" Instantly assuming that she did it on purpose, that I could never have enough skill to beat her.

And when I tried explaining what happened in my next D.E. bout - how the other girl kept changing lines, etc., and I only caught on too late for a comeback, - he simply said "yes, she hit you." That's all. After I was so pleased with how I did today, especially for someone at my level - it all came crashing down. I felt nothing. What today was worth anything - I felt so bad. Why can't he ever say anything nice, or even half-decent, to me?

Why is it so inconceivable that I could do as well, or even better than Dina? And although I know she's had a bad day, why does Paul think that the only way I could ever do better than her is because of a lousy day on her part? Why is it so hard to accept that I could have, on my own, done better, and improved? Why am I supposed to always rank behind her, and if I don't, why does Paul have to be convinced that it was ~~not~~ due to my increased skill, but her fault, &



decreased, performance ? | ? | ? | ? |

And up 'til now I thought it had been a really good day, that I had proved myself. I guess some things never change - I guess some coaches never do, either.

Post-script: Maja won 1st place. I ranked 8th - Dima was 9th - out of 11.

No, Paul - I don't think feedback is useless.

"Kat fenced well" in pools against Dima  
Oct. 13/96

Motto: arm first, arm high.

How many times does one cry before one gets to smile? In all the movies, books, etc. that showed athletic triumph, laughter followed the tears, always.

And yet I look at the girls around me who walk to the bathroom with their head hung low, and who emerge twenty minutes later with red eyes and a sniffling nose - sometimes they don't even make it to the washroom before the tears start flowing. And it happens to them competition after tournament, tournament



I know everyone says I "did well" -  
prefixed to the <sup>qualifier</sup> ~~conditions~~ "considering  
it was your first open" - but I don't  
really think so. ~~#~~ <sup>3</sup> ~~1~~ isn't good enough  
considering I can do better, and I know it.  
I won the most bouts in a competition  
- 4. At the last AAA, I won 2 out  
of the pools. At least I'm on an up-  
ward scale, unlike Kora - who always  
ranks last. She was fencing at least  
five other girls today - and she was  
crying after her first loss. No wonder  
she's a miserable fencer - if she doesn't  
see the five other opportunities to win,  
instead of the one she'd lost. So she  
lost miserably - scoring two points max.  
in a single bout, with her average  
scoring being 5-0 (not in her favour!)  
during all bouts.

Queens - 6th out of 28 after  
2 pools. In first bout,  
lost 2 or 3, won 4 (or 5?).  
In 2nd pool, lost to George,  
but won all the others.  
~~#~~ First D.F. - won 15-1.  
2nd D.F. - mental block +  
fear of winning = total fuck-up.  
I hate Michelle Peter from Trent



We came in second in Kingston. To do that we eliminated Ottawa C (comprised of George, Emmanuelle, Kira, and Hélène) 45-24. We were in turn eliminated by Ottawa A - the team I was originally supposed to be on (Majo, M.H., Linda, and April). I have no regrets. For the first time, my fencing shed light to what I really felt - I would have fenced with anyone other than Ottawa in order to beat Ottawa. It was an incredibly therapeutic experience; in the end I was so drained - emotionally and physically - that I could hardly function. Who would have thought that I would be on the same team as Katya and Tammy, when just exactly one year earlier, Katya was the girl whose hand I was unwilling to shake - that we would fence together!! For the first time ever I knew the meaning of team spirit - to back up your teammates & be backed up 100%. To have absolute confidence in their abilities and so be able to focus only on your own fencing.

The day started out so horrible - it was the epitome of all the worst things that could happen to throw me off track. Before my first bout I realized my pouch (including my wallet & all my I.D.) was missing. Barely able to focus, I made it through to my next bout. Then I realized, just before we were called on piste again that I had lost my gloves. Not until that ~~last~~



match was over did Paul come up to me on the bleachers and hand me my glove, having found it on the ground somewhere in the gym. Our pool comprised of McMaister or was it Tom? and McGill. We beat the first 45-20, and the second lost with a record-low pathetic 3 points to our 45.

It was incredible. Our people were cheering us on, and Katya was virtually holding my hand, coaching me through. If it had been anyone else I would have minded, but she was in a completely different influence on me - the alpha dog of the team.

In our D.E., we were up against McGill again - 2 teams had been eliminated, and they'd barely made it through.

As it was for us, Carleton was ranked 1st, 20 points over #2, Ottawa A. The other Ottawa teams made up the top 6.

Because of our overconfidence and the tendency of us that bout as practice for our next D.E., we unnecessarily let our guard down, allowing McGill to put 23 points on us before we got our second wind and put them out of their misery.

Tommy was telling me that what I had to really work on was my change of direction. I tend to go forward even when the other

person is doing the same (instead of backing up as they stepped forward). So mental note!

It was so incredible to be able to freely cheer against Ottawa U. They stood for everything that had that I've felt in the past year. I was not paying every injustice, every tear, every painful feeling. We so of the felt in the last year - in my bout against Ottawa U. I particularly let it

out against team C. We'd been secretly hoping they'd be defeated & even Sean was saying I'd hoped so for our sake - we'd have an easier time with a blank slate team - with whom we'd attached no psychological baggage. It wasn't just me who was psychologically intimidated - because of the long history of rivalry & really close

and bitter between our two universities, both Tommy and Katya were holding emotional crap that may get in the way.

But we started coming around with Ottawa C. I was so glad A and B had to fight it out in the P.E. It would be one less Ottawa team to deal with. The team I love, Dina, Janice, and Fiona were on-lost.

At the moment Ottawa C's boat was sitting with by Tom (I think) - and I realized we'd have to face them. I panicked. Sean told me to take a walk with him - he took me by the shoulders and we left the gym, walking down the long corridor to the near-empty RMC workout room. He told

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me to just relax and fence, like I'd been doing all along. My job was to keep it going and fight, and leave room for Katya to come in and do the work. Ottawa C were fencers like any others. They probably wanted to fence us as much as we wanted to meet them on piste. But really I had no choice. We were fencing for the silver, and either + whichever way we went, we were bound to encounter Ottawa. We were trapped from all directions so quitting by breaking out was not an option. If we lost, we'd have to fence Ottawa B for third. If we won this one, Ottawa A awaited us. So we had to knock down - well known all along that we'd run into them - and the moment had come. We had to recollect ourselves, forget all past encounters, and fence them as we would strangers. Point by point - was the motto. Once the mask got on, they're just fencers - just strange opponents - and it's all a chess match for the win.

Breathed (Sean told me to) deeply, reminding myself that oxygen wasn't a bad idea, and once I closed my eyes a few times, relaxed at Sean's presence, I decided I was together enough to re-enter the gym. As we walked back, Sean a comforting presence beside me all the way, I ran into

Paul. I didn't address him at all - he was an enemy that day, save for the time he found my glove.

Tammy fenced Emmanuelle first and beat her 3-0. It set the fearful pace. Katya fenced Kira, and after getting another 5 penalties, she acknowledged her surprise at just how exactly, as I described Kira's attacks had been. I made sure both my teammates were well briefed on just how predictable + easy to hit she was, imitating her count attacks in the very same way she attempted to do them. I told them she'd come in a slight low, they go high, gripping her back and trying to catch one by her line before they even got close. A classic counterattack - which practically served no purpose for Kira, in that she's always been beaten. Tammy beat her 3-0 as well. I got on with Emmanuelle (my only real sparring in that match), and she scored five for my every point. I could tell just how much I surprised her - she'd (by all) expected to catch us - even take the lead. By the end we were still leading by 4 or 5. It was the closest they'd ever come to us. Katya broadened the lead, and our solid points kept accumulating. But my bout w/ Kira was my highlight of the whole match - perhaps of all the



hunts I'd fenced. It started the moment  
she got on the piste and made the horrible  
mistake to smirk superiorly so George  
plugged her in. I repeat, B's mistake.  
The memory of my spite bout of Saturday  
came rushing back as cold anger seeped  
in. She obviously thought that she was  
big for the superior flucer - having beaten  
me 5-1 the previous day. I'd decided to  
let bygones be bygones and fence her as  
a stranger - I'd decided to forget all those  
poor bitchy episodes - but that self-assured  
red smirk took the cake. The first point  
was mine. I claimed the second. The third  
was hers. The fight had begun. I could  
see that all the Ottawa fencers had gather-  
ed around. Paul was in the corner of my  
eye. The battlefield was set. I was stuck  
born as a mule to make her pay. Inside  
her mask floated images of a favourite  
Maam and Paul - I was hitting them, I  
was beating up the whole club, I was  
getting back at last, with every hard  
hit of my blade. My side was hollering  
at every point - spurring me on. It was my  
battle against all those who'd hurt me at Ottawa.  
The fencing itself deteriorated to the point  
where Kira was unwilling to let me attack  
anymore, and I would not give an inch. We

were two dogs snapping for survival. Anyone  
who watched knew it was much more - after  
all Kira had done to me (and to others) in the  
past year, I was paying her back. Point by  
point for every tear she'd milked out of me.  
She rushed at me and I rushed at her and  
we collided. "No visible Halt!" yelled  
the judge. Dina later described the whole  
scholarship as "pathetic." After the day was  
over, George came up to me and said "you  
hurt me, don't you?" and admitted she  
saw it was much more, especially with Kira.  
The moment the judge said "Halt," Kira's  
point rushed into my rib as I stepped  
over her feet, stepping on her feet, and  
ready to send her (and she myself)  
to the ground. I heard people murmuring  
and starting to talk as even the judge  
ducked her tongue and saw we were fighting  
by means of the bout. I beat her 3-2  
or 3, and screamed out every point, as she  
shook her head. I've always looked down  
on Beverly Cadet and Joni Hare for  
screaming as they hit, but I honestly  
could not have sustained it if I tried. It's  
funny - every time I've tried to scream  
consciously (like at karate), I've  
faded miserably. For some Freudian  
reason my vocal chords collapse. And



yet it rushes out involuntarily, like an overflowing burst dam - when I score a point that means so much. It's only against the Ottawa team that I've ever screamed. It was so therapeutic - all my pain and anger rushing forth toward my competitor, my enemy, my dubmate.

In the end, as Tammy unhooked me from the reel, I jumped into one of our supporters' arms. Then Sean just hugged me fiercely. I was so happy! I'd gotten back not only the points I'd lost to Emmanuel, but my pride as well. I'd proved all those Exo losers that I could beat them at their own game. Paul went over & called Sean over to him, telling him to tell his teammates to tone it down - their fiercely loud screaming at our every point. He didn't want to create an enemy atmosphere - a hostility - bet ween our clubs. I laughed when Sean told me. So Ottawa had felt intimidated ~~that~~ hated, even. Well, that was good. Because I hated them.



spent so much time together this past year  
Deep down inside, that emotional fortress  
of yours, do you hate me? Do you see me  
as pathetic and unworthy?

Reasons for fencing at Carleton:

- I'm not getting any feedback on my progress from Ottawa U. coaches
- rampant favoritism (some get too much attention, others not enough)
- divisive structure system
- no one on one attention at all
- no encouragement from coaches
- feel I'm not getting enough training + lessons to progress
- if I fence six times a week, I may:
  - a) improve a lot faster + beat their "little darling"
  - b) finally get noticed by EXO coaches
  - c) fail all my courses(NOTE - you MUST start a strict scheduling study program!!!)



Jan. 5/97

So much has come to pass that I was considering not ever opening this book again. But some things must be said, some emotions need to be released.

I'll catch you up on what has gone on in time. Right now I just need an outlet to vent the most recent happenings. To sum up the past, though - in one sentence - I give up. I admit defeat. It's only routine that keeps me going to practice - I can't stand it, but I do it anyway. There's no joy in it at all. But I like being an athlete - no matter what the sport. I like working out, being reasonably healthy (although ~~but~~ I am encountering certain problems), I'll go into a gym, and in better shape than the vast majority of the population. But I hate what I'm doing, and place the blame squarely on Mary. Why do coaches do this, I wonder. Decide right away who's worth their time and who isn't. I've just realized that Dina's exactly on the opposite side of the same coin. They (the coaches), because of the way they feel about her - Paul romantically, Mary paternally - to expect so much that it puts undue weight and pressure

on her shoulders, to perform to their expectations, I see how this affects her much more clearly than even she does. ~~At~~ Nowadays, and twice in the last month, when things haven't gone her way - that is, if she couldn't perform something that way she thought she should (her expectations being so unrealistic, for a relative beginner, and no one to tell her that), she just quits altogether. As always, Paul pushed her + drove her lessons (although I am due for 2 he doesn't even look my way), and she for no reason started crying. Of course, Paul was understanding after she came back into the gym. If I ever pulled that stunt, what would you get a lecture, or at the very least, not get another opportunity to get the lesson? I'll wager anything that at practice tomorrow she'll be first on the lesson list. The other time she flipped out was when Expo scheduled a month's competition with the R.A. She quit after 1 hour (because she fencing didn't feel right - she wasn't doing anything, etc.) Mary gave her a 4 hr long (I timed it) pep talk in the hallway. For nothing! Repetitive just the previous weekend, at an open



APSIMON v HATEGAN

Court file no. CV-23-00091584-0000

SUPERIOR COURT OF JUSTICE

2d SUPPLEMENTARY MOTION RECORD