

Court File No.: CV-21-00658784-0000

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

**BETWEEN:**

Dr. Kulvinder Kaur Gill

Plaintiff

- and -

Amir ATTARAN, THE UNIVERSITY OF OTTAWA

Defendants

**PLAINTIFF'S LAWYER'S MOTION RECORD  
(REDACTED VERSION FOR PUBLIC FILING)**

ROCCO GALATI LAW FIRM  
PROFESSIONAL CORPORATION  
1062 College Street, Lower Level  
Toronto, Ontario M6H 1A9

TEL: (416) 530-9684  
FAX: (416) 530-8129  
Email: [rocco@idirect.com](mailto:rocco@idirect.com)

Lawyer for the Plaintiff

## INDEX

### TAB

1. Notice of Motion
2. Affidavit of [REDACTED], sworn July 17<sup>th</sup>, 2022

**TAB 1**

Court File No.: CV-21-00658784-0000

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

**B E T W E E N:**

**Dr. Kulvinder Kaur Gill**

**Plaintiff**

**- and -**

**Amir ATTARAN, THE UNIVERSITY OF OTTAWA**

**Defendants**

**NOTICE OF MOTION**

**THE LAWYER(S)** for the Plaintiff will make a motion to the court, in writing, to be disposed on February 13, 2023, at 10:00am, at:

393 University Ave.  
10<sup>th</sup> Floor  
Toronto, Ontario  
M5G 1E6

**PROPOSED METHOD OF HEARING:** The motion is to be heard by video conference:

THE MOTION IS FOR:

1. An Order removing Rocco Galati (Law Firm Professional Corporation) as lawyer for the Plaintiff based on health reasons, [REDACTED]
2. [REDACTED]
3. Such other and further relief this Court deems just.

THE GROUNDS FOR THIS MOTION ARE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

IN SUPPORT OF THIS MOTION, THE PLAINTIFF RELIES UPON THE FOLLOWING:

- (a) The Affidavit of Samantha Coomara, Barrister and Solicitor, sworn June 17<sup>th</sup>, 2022.

THE RELIEF SOUGHT IS:

- (a) Rocco Galati, and ROCCO GALATI LAW FIRM PROFESSIONAL CORPORATION, be removed from the record as counsel for the Plaintiff;
- (b) Such further and other relief as this Honourable Court deems just.

DATED at Toronto, this 20<sup>th</sup>, day of January, 2023.



---

ROCCO GALATI LAW FIRM  
PROFESSIONAL CORPORATION  
1062 College Street, Lower Level  
Toronto, Ontario M6H 1A9

TEL: (416) 530-9684

FAX: (416) 530-8129

Email: [rocco@idirect.com](mailto:rocco@idirect.com)

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TWO VERSIONS: A REDACTED COPY FOR FILING PURPOSES WITH THE COURT, to maintain solicitor- client privilege, and an unredacted version for review by the Judge.

TO: Registrar of this Honourable Court

TO:

Dr. Kulvinder Gill  
2250 Boivard Drive East, Suite 416  
Brampton ON L6R 0W3  
Phone: (905) 452-0015  
Fax: (905) 452-1309  
Email: [kulvinder.g@gmail.com](mailto:kulvinder.g@gmail.com)

TO: THE RESPONDENTS (DEFENDANTS) -REDACTED NOTICE OF MOTION ONLY

TO:

Borden Ladner Gervais LLP  
World Exchange Plaza  
100 Queen St, Suite 1300  
Ottawa, ON, Canada

David Sherriff-Scott  
T 613.787.3527  
[dsherriffscott@blg.com](mailto:dsherriffscott@blg.com)

Lawyers for University of Ottawa

AND TO:

KELLY SANTINI LLP  
2401-160 Elgin Street  
Ottawa, ON K2P 2P7  
613.238.6321

Pat Santini/J.P. Zubec  
613.238.6321  
ext. 234  
[psantini@kellysantini.com](mailto:psantini@kellysantini.com)  
Lawyers for the Defendant, Amir Attaran

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Court File No.: CV-21-00658784-0000

**DR. KULVINDER GILL**

Plaintiff

**Amir ATTARAN et al**

-and-  
Defendants

**SUPERIOR COURT OF ONTARIO**

**Proceeding Commenced at Toronto**

**NOTICE OF MOTION**

**ROCCO GALATI LAW FIRM  
PROFESSIONAL CORPORATION  
1062 College Street, Lower Level  
Toronto, Ontario M6H 1A9  
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Email: [rocco@idirect.com](mailto:rocco@idirect.com)  
Lawyer for the Plaintiff**



**TAB 2**



4. [REDACTED] Christmas 2021, Mr. Galati fell extremely ill and was hospitalized. He suffered from a [REDACTED] and lengthy hospitalization.

5. On February 2, 2022, while Mr. Galati was still hospitalized, the Superior Court issued its decision and Reasons in the Defendants' favour on the anti-SLAPP motion.

6. On April 5, 2022, Mr. Galati's spouse, Ms. Sherzad, who was acting as his agent, contacted Dr. Gill and informed him of Mr. Galati's illness and recovery, called Dr. Gill and informed him that it was necessary for Dr. Gill and the other Plaintiff to have legal counsel for the appeal as Mr. Galati was still not able to attend to his own legal affairs and I did not have the necessary competence in determining legal appeal work and to advise these clients that these are important matters and I have a duty to advise them. Ms. Sherzad was unable to contact Dr. Gill and the other Plaintiff. Dr. Gill and the other Plaintiff later insisted that Mr. Galati participate in a video conference with them.

7. A video conference was arranged with Mr. Galati. Mr. Galati's spouse and I both attended on April 5, 2022.

8. In addition to the scheduled teleconferences, we also corresponded with the Dr. Gill and the other Plaintiff, by email, to explain why withdrawal as counsel was not possible and to set mandatory.

9. Dr. Gill and the other Plaintiff, despite our efforts to return as alternative counsel, and in fact, refused to even communicate and respond to me or Ms. Sherzad. They insist on strictly dealing with Mr. Galati and that Mr. Galati should conduct that appeal on that matter which

10. Mr. Galati was forced to bring a motion to be removed from the record at the Court of Appeal. This motion was granted. Attached as Exhibit A is a copy of the Court of Appeal's endorsement.

11. During the course of responding to Mr. Galati's motion at the Court of Appeal, I and the other Plaintiff, unfortunately, made baseless allegations about Galati, and his conduct in the context of his serious illness, as well as misrepresented to the Court, in their affidavit, which further, and irrevocably, impaired the entire solicitor-client relationship, which went beyond the Court of Appeal matter and involved representation of the Plaintiff before the College of Physicians and Surgeons of Ontario, Divisional Court and the current matter. In fact, Mr. Galati's office notified Dr. Gill to advise her that, in the face of the complete rupture of the solicitor-client relationship, she needed to obtain new counsel. Attached as Exhibit B is a copy of the letter.

12. In addition, my new counsel was obliged to file a Notice of Appearance in the Superior and Divisional Court matters. Attached hereto as Exhibit C is a copy of the Notice of Appearance filed in the Superior Court.

13. However, Dr. Gill has not yet obtained any counsel with respect to the matter, and further refuses to respond to correspondence with respect to the matter.

14. Even after receiving the Court of Appeal's May 11, 2022 endorsement, I was required to provide the court with a final Court Order, Order for Removal.

[REDACTED]

[REDACTED]

**Content of Order**

15.04

(1) The order removing a lawyer from the record shall include:

(a) the client's last known address, or the address for service if different;

(b) the address, if any, where the client may be contacted, or, if likely to come to the client's attention;

(c) the telephone number and street address of the client;

(d) if the client is a corporation, the text of subrules (a) and (b);

(e) if the client is not a corporation, the text of subrules (a) and (b).

**Clients Other Than Corporations**

*This is the text that to add to 15.04(1)*

(2) A client who is not a corporation shall within 30 days after being

served with the order removing the lawyer from the record:

(a) appoint a new lawyer of record by serving a notice under subrule 15.04(1); or

(b) serve a notice of intention to act in person under subrule 15.04(1), O. Reg. 575/07, s. 13(3).

(3) If the client fails to comply with subrule (2):

(a) the court may dismiss the client's proceeding or strike out his or her defence; and

(b) the court may:

(i) a judge of the appellate court may, on motion, dismiss the client's appeal;

(ii) the court hearing the appeal may deny the client the right to be heard. O. Reg. 575/07, s. 2(3).

15. [Redacted text]

- (a) [Redacted text]
- (b) of providing [Redacted text]
- (c) [Redacted text]

Please see attached correspondence [Redacted text]

16. [Redacted text]

17. [Redacted text]

18. [Redacted text]

19.

[Redacted text]

[Redacted text]

[18] Assuming that timing is an issue, the court is entitled to enquire further. Counsel may reveal that he or she seeks to withdraw for ethical reasons, non-payment of fees, or another specific reason (e.g. workload of counsel) if solicitor-client privilege is not engaged. Counsel seeking to withdraw for ethical reasons means that an issue has arisen in the solicitor-client relationship where it is now impossible for counsel to continue in good conscience to represent the accused. Counsel may cite "ethical reasons" as the reason for withdrawal if, for example, the accused is requesting that counsel act in violation of his or her professional obligations (see, e.g., *Law Society of Upper Canada v. 209 (1) (b) (1)*, *Law Society of Alberta v. 14 (1)*, *Law Society of British Columbia v. 10 (1)*), or if the accused refuses to accept counsel's advice on an important trial issue (see, e.g., *Law Society of Upper Canada v. 209 (2)*, *Law Society of Alberta v. 14 (1)*, *Law Society of British Columbia v. 10 (2)*). If the stated reason for withdrawal is non-payment of legal fees, the counsel must answer to the court about or disclose such withdrawal for "ethical reasons". However, in either the case of ethical reasons or non-payment of fees, the court must accept counsel's answer at face value and not enquire further so as to avoid trenching on potential issues of solicitor-client privilege.

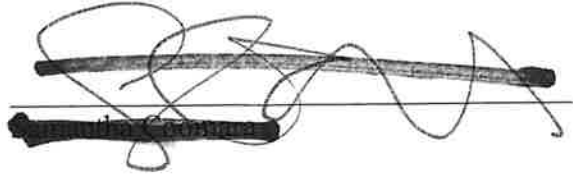
[19] If withdrawal is sought for an ethical reason, then the court must grant withdrawal (see *C. (D.D.)*, at para. 28, and *Deschamps*, at para. 20). Where an ethical issue has arisen in the relationship, counsel may be required to withdraw in order to comply with his or her professional obligations. It would be inappropriate for a court to require counsel to continue to act when to do so would put him or her in violation of professional responsibilities.



[Redacted text]

20.

[REDACTED]  
[REDACTED] from the record in the Plaintiff's appeal.

SWORN BEFORE ME at the City )  
of Toronto, in the Province of )  
Ontario, on this 17<sup>th</sup> day of )  
June, 2022 )



  
A Commissioner for Taking Affidavits  




11

This is Exhibit <sup>"A"</sup> referred to in the  
affidavit of ~~\_\_\_\_\_~~  
sworn before me, this <sup>17<sup>th</sup></sup>  
day of June 2022

~~\_\_\_\_\_~~

A COMMISSIONER FOR TAKING AFFIDAVITS

**COURT OF APPEAL FOR ONTARIO**

BEFORE: THE HONOURABLE JUSTICE  
GILLESE



COURT FILE NO.: M53387 (C70498)

TITLE OF PROCEEDING: DR. GILL,  
KULVINDER KAUR ET AL. v. DR. MACIVER  
ET AL.

DATE: WEDNESDAY, MAY 11, 2022

DISPOSITION OF COURT HEARING:

Mr. Galati personally and his law firm Rocco Galati Law Firm Professional Corporation (the "Law Firm") are counsel of record for the appellants in this matter. Unfortunately, Mr. Galati had a lengthy hospitalization and was in a coma from which he is still recovering. He has not yet returned to practice and is not currently competent to attend to the appeal.

Accordingly, Mr. Galati brought this motion asking that he and his Law Firm be removed as counsel of record for the appellants. The appellants oppose the motion because they would like Mr. Galati to remain as their lawyer due to the complexity of the evidentiary record underlying the appeal and the appeal's connection to their other legal proceedings in which Mr. Galati is counsel.

In light of Mr. Galati's medical condition and consequent inability to competently attend to the appeal, in my view, this court must grant the requested withdrawal. *R. v. Cushingham*, 2010 SCC 10, [2010] 1 S.C.R. 301, at paras. 48-49.

Accordingly, the motion is granted, and I order that:

1. Mr. Galati and the Law Firm are removed from the record as counsel for the appellants in this matter; and
2. the deadline for perfecting the appeal is extended to ninety (90) days from the date of this endorsement to allow the appellants time to retain and instruct new lawyers.

A handwritten signature in black ink, appearing to read "Gillespie J.A.", with a horizontal line drawn through it.

This is Exhibit "B" referred to in the  
affidavit of ~~\_\_\_\_\_~~  
sworn before me, this 17<sup>th</sup>  
day of June 20. 2022

~~\_\_\_\_\_~~

A COMMISSIONER FOR TAKING AFFIDAVITS

**ROCCO GALATI LAW FIRM  
PROFESSIONAL CORPORATION**  
1062 College Street, Lower Level  
Toronto, Canada M6H 1A9  
Phone (416) 530-9684 Fax (416) 530-8129

May 17<sup>th</sup>, 2022

VIA EMAIL

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11

~~XXXXXXXXXX LAW FIRM PROFESSIONAL CORPORATION~~

Per:

A handwritten signature in black ink, appearing to be 'N. G.', written over a horizontal line.

~~XXXXXXXXXX~~

18

This is Exhibit <sup>x</sup> (11) referred to in the  
affidavit of [REDACTED]  
sworn before me, this [REDACTED]  
day of June 20, 2022.  
[REDACTED]  
[REDACTED]  
A COMMISSIONER FOR TAKING AFFIDAVITS

Toronto Superior Court of Justice / Cour supérieure de justice

Subject: ~~Change of Lawyer - Dr. Kulvinder Gill~~

Date: ~~Tue, June 15, 2022 12:08 pm~~

To: ~~jpavamani@cps0.on.ca <jpavamani@cps0.on.ca>~~

Cc: ~~rocco@direct.com <rocco@direct.com>, "Kulvinder Gill" <kulvinder.g@gmail.com> "Libertas Law Info" <info@libertaslaw.ca>~~

~~Good morning Ms. Pavamani,~~

~~I have used the above email address to contact you regarding the withdrawal of my application for mediation. I am copying on this email as the previous court order was not followed.~~

~~My court file number is 648-2022-09508.~~

~~Note that I am now also representing Dr. Gill with respect to current matters before the ARB. I will advise CPSO Counsel separately.~~

~~My contact information is below. Please direct all future correspondence on this matter to my attention.~~

~~[Redacted]~~

**Lisa D.S. Bilty, JD, BA**

P: 519.852.6967

E: bilty@libertaslaw.ca

**Libertas Law**

341 Talbot Street, London, ON N6A 2R5

www.libertaslaw.ca

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**Attachments:**

<b>untitled-[1]</b>
Size: 1.7 k
Type: text/plain



Court File No.: Div-Ct-221-21

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(DIVISIONAL COURT)**

**BETWEEN:**

DR. KULVINDER KAUR GILL

Applicant

- and -

THE COLLEGE OF PHYSICIANS AND SURGEONS OF ONTARIO (THE INQUIRIES  
COMPLAINTS AND REPORTS COMMITTEE) THE MINISTER FOR HEALTH AND  
LONG-TERM CARE, THE ATTORNEY GENERAL FOR ONTARIO

Respondents

**NOTICE OF CHANGE OF LAWYER**

The Applicant, formerly represented by Rocco Galati, has appointed Lisa D.S. Bilyd as lawyer of record.

DATE: June 15, 2022

**LIBERTAS LAW**  
341 Talbot Street  
London ON N6A 2R5

**LISA D.S. BILDY** (LSO No. 36583A)  
Tel: 519-852-6967  
Email: [bilyd@libertaslaw.ca](mailto:bilyd@libertaslaw.ca)

**Counsel for the Applicant,  
Dr. Kulvinder Kaur Gill**

TO: **ROCCO GALATI LAW FIRM PROFESSIONAL CORPORATION**  
1062 College Street, Lower Level  
Toronto, ON M6H 1A9

**Rocco Galati**  
Tel: 416-530-9684  
Fax: 416-530-8129  
Email: [rocco@idirect.com](mailto:rocco@idirect.com)

**Former Counsel for the Applicant**



AND TO: **THE ATTORNEY GENERAL OF ONTARIO**  
Constitutional Law Branch  
720 Bay Street, 4<sup>th</sup> Floor  
Toronto, ON M7A 2S9  
Fax: 416-326-4015

**Daniel Huffaker** (LSO #56804F)  
Tel: 416-894-3107  
Email: [Daniel.Huffaker@ontario.ca](mailto:Daniel.Huffaker@ontario.ca)

**Rika Sawatsky** (LSO #68254S)  
Tel: 416-455-5186  
Email: [Rika.Sawatsky@ontario.ca](mailto:Rika.Sawatsky@ontario.ca)

**Counsel for the Respondents, The Minister of Health and Long-Term Care  
and The Attorney General of Ontario**

AND TO: **COLLEGE OF PHYSICIANS AND SURGEONS OF ONTARIO**  
Legal Office  
80 College Street Toronto, ON M5G 2E2

**Lisa Brownstone** (LSO #30578M)  
Tel: 416-967-2600 ext. 472  
Fax: 416-967-2647  
Email: [lbrownstone@cpsso.on.ca](mailto:lbrownstone@cpsso.on.ca)

**Ruth Ainsworth** (LSO #67996U)  
Tel: 416-967-2600 ext. 492  
Fax: 416-967-2647  
Email: [rainsworth@cpsso.on.ca](mailto:rainsworth@cpsso.on.ca)

**Counsel for the Respondent, College of Physicians and Surgeons of Ontario**

Court File No.: 221-2

**DR. KULVINDER KAUR GILL**

-and -

**THE COLLEGE OF PHYSICIANS AND SURGEONS OF  
ONTARIO et al.**

Applicant

Respondent

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(DIVISIONAL COURT)**

**Proceedings Commenced at Toronto**

**NOTICE OF CHANGE OF LAWYER**

**LIBERTAS LAW**  
341 Talbot Street  
London ON N6A 2R5

**LISA D.S. BILDY** (LSO No. 36583A)  
Tel: 519-852-6967  
Email: [bildy@libertaslaw.ca](mailto:bildy@libertaslaw.ca)

**Counsel for the Applicant, Dr. Kulvinder Kaur G**

22

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This is Exhibit 10 referred to in the  
affidavit of [Redacted]  
sworn before me, this 17<sup>th</sup>  
day of June 2022.

[Redacted Signature]  
A COMMISSIONER FOR TAKING AFFIDAVITS

Date: [REDACTED] June 16, 2022 4:28 PM  
To: [REDACTED]@direct.com; Stacy (JUD) <stacy.singh@ontario.ca>; "Lewinson, Samantha (JUD)" <samantha.lewinson@ontario.ca>; Swaby, Tameka (JUD) <tameka.swaby@ontario.ca>  
Cc: [REDACTED] and [REDACTED] <alkgaur@gmail.com>

Good afternoon,

We, Drs. Lamba and Gill had received an emailed copy of The Honourable Justice Gilese's court order dated May 11, 2022 on May 11, 2022 which granted Mr. Galati's withdrawal in this matter and which ordered the deadline for perfecting an appeal is extended to ninety (90) days from the date of his withdrawal to allow the appellants time to retain and instruct new lawyers.

As we had previously stated in our email on May 16, 2022, we intend to adhere to this 90-day deadline to retain and instruct new legal counsel to perfect the appeal as was ordered by The Honourable Justice Gilese on May 11, 2022. We will serve all parties and file a notice of appointment of the lawyer with the court.

We are uncertain as to what Mr. Galati is trying to accomplish by repeatedly attempting to override the judge's order being in contempt of the court. The time has long passed for any further input from either party, including the new draft order which contained erroneous information, drafted unilaterally by Mr. Galati after the motion hearing and after The Honourable Justice Gilese's issued the court order on this matter dated May 11, 2022.

Please note, as was submitted in our individual sworn affidavits dated April 30, 2022, and served on May 1, 2022, our contact information on the public record is as follows:

Dr. Ashvinder Gill  
220-400 Bronte Street S.  
Mississauga, ON, L5T 0H7  
Phone: 289-878-8866  
Email: alk@alkgaur@gmail.com

Dr. Ashvinder Lamba  
6-10 Earlebridge Blvd.  
Brampton, ON, L6A 3P1  
Phone: 905-840-4777  
Email: alk@alkgaur@gmail.com

Thank you,

Drs. Lamba and Gill

On Thu Jun 16, 2022 at 2:55 PM <rorco@direct.com> wrote:  
We never received an issued court order.

Here is a draft with the parties' updated addresses:

Thank you,

Samantha Lewinson  
RORCO LEGAL SERVICES FIRM  
PROFESSIONAL CORPORATION  
Rocco Galati, 201-1087, Unit 108  
1067 College Street, Lower Level  
Toronto ON M6H 1A9  
TEL: 416-530-9684  
FAX: 416-530-8129

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2

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le supprimer et aviser rocco@idirect.com immédiatement.

"Oh why, oh why, does the wind never blow backwards?" -- Woody Guthrie

- > Good morning,
- >
- >
- > We, Ms. Lamba and I, had received an emailed copy of the Honourable
- > Justice Gillespie's court order dated May 11, 2022 on May 12, 2022, which
- > granted Ms. Lamba's writs with a 90-day time limit, which ordered Justice
- > Gillespie for perfecting the appeal is extended to ninety days from
- > the date of the order. Ms. Lamba and I have been instructed to retain and
- > instruct new lawyers as of
- >
- >
- > Ms. Lamba is currently very unwell and will require a minimum of two weeks
- > to recover following her personal medical intervention we intend to
- > use this 90-day deadline to retain and instruct new legal counsel to
- > perfect the appeal as ordered by the Honourable Justice Gillespie on May 11,
- > 2022. We will serve all parties and file a notice of appointment of lawyers
- > as soon as possible.
- >
- >
- > The time has passed for any further input from either party including the
- > submission of any further evidence or information. I drafted this email by
- > mistake after the meeting hearing and after the Honourable Justice
- > Gillespie's issued court order on this matter dated May 11, 2022.
- >
- >
- > Please note, as was stipulated in the affidavits sworn on this date
- > April 27, 2022, and served on the other party, our correct contact information
- > on the public record is as follows:
- >
- >
- >
- > 2000 Bronte Street
- >
- > Milton, ON, L7T 0A7
- >
- > Phone: 905-888-8664
- >
- > Email: anagkour@gmail.com
- >
- >
- > Dr. Ashvinder Lamba
- >
- > 10 Earlsbridge Blvd
- >
- > Brampton, ON, L7A 0A7
- >
- > Phone: 905-840-8400

Date: Thu, Jun 16, 2022, 5:43 pm  
To: "Ashvinder and Kulvinder" <ajkgraur@gmail.com>  
Cc: rocco@idirect.com <Rocco.Galat (J.D.) <stacy.smith@ontario.ca>, Lewinson, Samantha (J.D.) <samantha.lewinson@ontario.ca>, "Swaby, Jenika (J.D.)" <jenika.swaby@ontario.ca>, "Ashvinder and Kulvinder" <ajkgraur@gmail.com>

Dr. Kulvinder / Dr. Lawba

[REDACTED]

[REDACTED]

ROCCO GALATI LAW FIRM  
PROFESSIONAL CORPORATION  
Rocco Galati, B.A., LL.B., LL.M.  
1062 College Street, Lower Level  
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Tel: 416-530-9684  
416-530-8129

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"Oh, why, oh why, does the wind never blow backwards?" - Woody Guthrie

[REDACTED]

Court File No.: CV-21-00658784-0000

**DR. KULVINDER GILL**

Plaintiff

**Amir ATTARAN et al**

Defendants

-and-

**SUPERIOR COURT OF ONTARIO**

**Proceeding Commenced at Toronto**

**AFFIDAVIT**

**ROCCO GALATI LAW FIRM**  
**PROFESSIONAL CORPORATION**  
Samantha Coomara, B.A., J.D.  
1062 College Street, Lower Level  
Toronto, Ontario M6H 1A9  
TEL: (416) 530-9684  
FAX: (416) 530-8129  
Email: [rocco@idirect.com](mailto:rocco@idirect.com)  
Lawyer for the Plaintiff

Court File No.: CV-21-00658784-0000

**DR. KULVINDER GILL**

Plaintiff

**Amir ATTARAN et al**

-and- Defendants

**SUPERIOR COURT OF ONTARIO**

**Proceeding Commenced at Toronto**

**MOTION RECORD**

**ROCCO GALATI LAW FIRM**  
**PROFESSIONAL CORPORATION**  
Samantha Coomara, B.A., J.D.  
1062 College Street, Lower Level  
Toronto, Ontario M6H 1A9  
TEL: (416) 530-9684  
FAX: (416) 530-8129  
Email: [rocco@idirect.com](mailto:rocco@idirect.com)  
Lawyer for the Plaintiff