

Q-24- 007/4780-0000

**ONTARIO**  
**SUPERIOR COURT OF JUSTICE**  
**DR. ASHVINDER KAUR LAMBA**

and

Plaintiff

ROCCO GALATI and ROCCO GALATI LAW FIRM PROFESSIONAL CORPORATION

Defendants

INFORMATION FOR COURT USE

1. This proceeding is an: ☒ action ☐ application
2. Has it been commenced under the *Class Proceedings Act, 1992*? ☐ yes ☒ no

3. If the proceeding is an action, does Rule 76 (Simplified Procedure) apply? ☐ yes ☒ no

Note: *Subject to the exceptions found in subrule 76.01(1), it is MANDATORY to proceed under Rule 76 for all cases in which the money amount claimed or the value of real or personal property claimed is \$200,000 or less.*

4. The claim in this proceeding (action or application) is in respect of:

(Select the **one** item that **best** describes the nature of the main claim in the proceeding.)

Bankruptcy or insolvency law	<input type="checkbox"/>	Motor vehicle accident	<input type="checkbox"/>
Collection of liquidated debt	<input type="checkbox"/>	Municipal law	<input type="checkbox"/>
Constitutional law	<input type="checkbox"/>	Partnership law	<input type="checkbox"/>
Construction law (other than construction lien)	<input type="checkbox"/>	Personal property security	<input type="checkbox"/>
Construction lien	<input type="checkbox"/>	Product liability	<input type="checkbox"/>
Contract law	<input type="checkbox"/>	Professional malpractice (other than medical)	<input checked="" type="checkbox"/>
Corporate law	<input type="checkbox"/>	Real property (including leases; excluding mortgage or charge)	<input type="checkbox"/>
Defamation	<input type="checkbox"/>	Tort: economic injury (other than from medical or professional malpractice)	<input type="checkbox"/>
Employment or labour law	<input type="checkbox"/>	Tort: human trafficking ( <i>Prevention of and Remedies for Human Trafficking Act, 2017</i> )	<input type="checkbox"/>
Intellectual property law	<input type="checkbox"/>	Tort: personal injury (other than from motor vehicle accident)	<input type="checkbox"/>
Judicial review	<input type="checkbox"/>	Trusts, fiduciary duty	<input type="checkbox"/>
Medical malpractice	<input type="checkbox"/>	Wills, estates	<input type="checkbox"/>
Mortgage or charge	<input type="checkbox"/>		

Date: February 14, 2024



Name of filer

RCP-E 14F (January 2, 2024)

CV-24-08714780-

Court File No.

cccc

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

BETWEEN:

DR. ASHVINDER KAUR LAMBA

Plaintiff

and

ROCCO GALATI and ROCCO GALATI LAW FIRM  
PROFESSIONAL CORPORATION

Defendants

**STATEMENT OF CLAIM**

TO THE DEFENDANTS

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a statement of defence in Form 18A prescribed by the *Rules of Civil Procedure*, serve it on the plaintiff's lawyer or, where the plaintiff does not have a lawyer, serve it on the plaintiff, and file it, with proof of service in this court office, WITHIN TWENTY DAYS after this statement of claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a statement of defence, you may serve and file a notice of intent to defend in Form 18B prescribed by the *Rules of Civil Procedure*. This will entitle you to ten more days within which to serve and file your statement of defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

IF YOU PAY THE PLAINTIFF'S CLAIM, and \$1,000.00 for costs, within the time for serving and filing your statement of defence you may move to have this proceeding dismissed by the court. If you believe the amount claimed for costs is excessive, you may pay the plaintiff's claim and \$400 for costs and have the costs assessed by the court.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commenced unless otherwise ordered by the court.

Date February 14, 2011 Issued by cc Lisa Lawson  
Local Registrar

Address of  
court office: Toronto Courthouse  
393 University Ave. - 6th Floor  
Toronto, Ontario M5G 1E6

TO: **ROCCO GALATI**  
1062 College Street,  
Toronto, Ontario, M6H 1A9

AND TO: **ROCCO GALATI LAW FIRM PROFESSIONAL CORPORATION**  
1062 College Street,  
Toronto, Ontario, M6H 1A9

SUPERIOR COURT OF JUSTICE 330 UNIVERSITY AVE. 8TH FLOOR TORONTO, ONTARIO M5G 1R7	COUR SUPÉRIEURE DE JUSTICE 330, AVE. UNIVERSITY 8E ÉTAGE TORONTO, ONTARIO M5G 1R7
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## CLAIM

1. The plaintiff claims:
  - (a) General and special damages for professional negligence, breach of fiduciary duty and/or breach of contract in the amount of \$500,000.
  - (b) Aggravated and/or punitive damages in the amount of \$100,000.
  - (c) Prejudgment interest in accordance with the *Courts of Justice Act*, R.S.O. 1990 c. C.43.
  - (d) Post-judgment interest in accordance with the *Courts of Justice Act*, *supra*.
  - (e) The costs of this action on a substantial indemnity basis.
  - (f) Such further and other relief as the plaintiff may advise and as this Honourable Court may permit.

## The parties

2. The plaintiff, Dr. Ashvinder Kaur Lamba (“Dr. Lamba”), is a family physician practicing in Brampton and Toronto, Ontario. In addition to being a medical doctor, Dr. Lamba also has a research Master’s degree in Science in Genetic Counselling, along with a clinical Master’s degree in Biochemistry and Microbiology with her thesis focusing on human genetics. Dr. Lamba is a former delegate of the Ontario Medical Association (“OMA”) and member of the OMA Governing Council, and is now Secretary of the Board of Concerned Doctors of Ontario, a non-profit organization composed of frontline physicians advocating for a patient-centered, sustainable, accessible and quality health-care system.

3. The defendant, Rocco Galati (“Mr. Galati”), is a lawyer licensed to practice law in the Province of Ontario. At all material times, Mr. Galati practiced law, *inter alia*, in the field of civil litigation and held himself out as being an expert or competent lawyer in the field of defamation law and civil litigation more broadly.

4. The defendant, Rocco Galati Law Firm Professional Corporation (the “Professional Corporation”), is Mr. Galati’s professional corporation and law firm, and the vehicle through which he practices law and bills clients. At all material times, the Professional Corporation held itself out as being an expert law firm in the field of defamation law and civil litigation more broadly.

5. Collectively, Mr. Galati and the Professional Corporation shall be referred to as the “**Galati Defendants**”.

**The defendants’ representation of the plaintiff**

6. In or about the autumn of 2020, the Galati Defendants and Dr. Lamba entered into a solicitor-client relationship. At that time, the Galati Defendants began providing her with legal advice and services in respect of defamatory statements that had been published about her in or around September 2018 by two non-party physicians, hereinafter the “First Doctor” and “Second Doctor”, whose identities are known to the Galati Defendants. At all material times, the Galati Defendants owed Dr. Lamba a fiduciary duty, along with a duty of care and good faith.

7. As a result of the said defamatory publications, Dr. Lamba suffered significant damage to her reputation, both personally and as a physician, along with hateful social media messages. Her standing in the medical community was adversely affected, and the harm was exacerbated due to the fact that she was a female physician of colour. She also suffered personal anguish and suffering.

8. Dr. Lamba only had a meritorious claim against the First Doctor and did not have a meritorious claim against the Second Doctor. Notwithstanding this, the Galati Defendants expressly or impliedly advised Dr. Lamba, directly or indirectly or indirectly, that she had a meritorious claim against the Second Doctor. They further expressly or implicitly advised and

recommended directly or indirectly that Dr. Lamba sue both physicians, which thereby exposed her to significant costs *vis-à-vis* the Second Doctor.

9. At or about the same time that the parties entered into a solicitor-client relationship, the Galati Defendants also entered into a solicitor-client relationship with the non-party, Dr. Kulvinder Gill. The above-mentioned publications of the First Doctor and Second Doctor were also of and concerning Dr. Gill. However, Dr. Gill was also the subject of numerous other publications regarding her positions concerning the COVID-19 pandemic (the “COVID-19 Claims”). Due to Mr. Galati’s strong ideological beliefs concerning the COVID-19 pandemic, the Galati Defendants advised and recommended that Dr. Gill bring an action against approximately twenty-two separate entities (the “Gill Defendants”) in respect of the COVID-19 Claims.

10. After entering into a solicitor-client relationship with Dr. Lamba, the Galati Defendants had very sparse communication with her and dealt almost exclusively with Dr. Gill. Dr. Lamba never provided consent or authorization for Dr. Gill to act as her agent. As a result, Dr. Lamba was kept out of the loop on numerous important issues and decisions and was not able to provide informed consent or instructions on matters related to her claim.

### **The Action**

11. The substance of Dr. Lamba’s claim had nothing whatsoever to do with the substance of the COVID-19 Claims, aside from the fact that Dr. Gill was the subject of the publications in both claims. There was also an overlap in one defendant — being the Second Doctor — however, as noted above, Dr. Lamba did not have a meritorious claim against the Second Doctor. Moreover, the COVID-19 Claims concerned approximately 22 defendants on an issue of immense public

interest, being issues related to the COVID-19 pandemic. As such, the COVID Claims invited anti-SLAPP motions that were almost certain to be successful.

12. Notwithstanding the extremely strong reasons for keeping the claims separate, the Galati Defendants advised and recommended that Dr. Lamba's claim be brought in the same action as Dr. Gill's COVID-19 Claims against the Gill Defendants. They further misrepresented to Dr. Lamba that joining her narrow claim to the COVID-19 Claims was proper and was in her best interests. As such, these two claims proceeded together in a single action (the "Action").

13. The Galati Defendants prepared and then issued a lengthy Statement of Claim on behalf of Drs. Lamba and Gill (the "Statement of Claim"). The Statement of Claim was grossly deficient in numerous respects. These include, but are not limited to, the following:

- (a) The Statement of Claim improperly brought Dr. Lamba's claim together with the COVID-19 Claims and failed to clearly separate the narrow claim of Dr. Lamba from Dr. Gill's extensive and broad COVID-19 Claims;
- (b) The Statement of Claim improperly named the Second Doctor as a defendant in respect of Dr. Lamba's claim despite the fact that Dr. Lamba lacked a meritorious claim against the Second Doctor;
- (c) The Statement of Claim improperly stated that Dr. Lamba was seeking aggravated and punitive damages against **all** defendants, including the Gill Defendants, on a joint and several basis;
- (d) The Statement of Claim improperly alleged that **all** defendants were jointly and severally liable to **both** plaintiffs for the torts of defamation, negligence, conspiracy and breach of professional obligations, notwithstanding that 21 of the defendants had nothing whatsoever to do with Dr. Lamba, that Dr. Lamba had no desire or intention of suing those defendants, and that Dr. Lamba's only meritorious claim was in defamation as against the First Doctor;
- (e) The Statement of Claim failed to plead proper defamatory meanings, improperly focused on Dr. Maciver's insults rather than the defamatory sting of his

publications, and otherwise failed to plead sufficient particulars of Dr. Lamba's defamation claim; and

- (f) The Statement of Claim advanced numerous exaggerated or false allegations and claims, along with excessive damages.

14. The Galati Defendants did not alert Dr. Lamba to the serious problems with the Statement of Claim, as noted above and the grossly deficient way in which her claim was being articulated and advanced.

15. On or about January 28, 2021, the Galati Defendants entered into a written retainer agreement with Dr. Lamba, notwithstanding they had already provided legal advice and services to her and had prepared and issued a claim on her behalf.

#### **The Anti-SLAPP Motions**

16. After the Statement of Claim had been issued and served, all of the defendants in the Action brought motions pursuant to s.137.1 of the *Courts of Justice Act, supra* (the "Anti-SLAPP Motions"). Due to the significant deficiencies in the Statement of Claim set out above, and especially the fact that Dr. Lamba's claim against the First Doctor had been comingled and conflated with Dr. Gill's numerous COVID-19 Claims, the First Doctor also brought an Anti-SLAPP Motion.

17. In defending the Anti-SLAPP Motions brought by the First Doctor and Second Doctor, the Galati Defendants committed numerous errors and breaches of the duties owed to their client, Dr. Lamba. These include but are not limited to the following:

- (a) They failed to articulate the defamatory sting or meanings of the First Doctor's and Second Doctor's publications.



- (b) They effectively ignored the First Doctor's actual defamatory statements and focused instead on the insulting words the First Doctor had employed in his publications, notwithstanding the Galati Defendants knew or ought to have known that mere insults are not actionable;
- (c) They failed to adduce any evidence from Dr. Lamba regarding the harm she had suffered as a result of the First Doctor's and Second Doctor's publications. The only evidence of harm was adduced by Dr. Gill and it simply referred back to boilerplate allegations in the Statement of Claim. This, despite the fact that the Galati Defendants knew or ought to have known that the harm a plaintiff has likely suffered is one of the key issues and determinations to be made on an anti-SLAPP motion and that by not adducing evidence of harm the Galati Defendants were dooming Dr. Lamba's claim;
- (d) They failed to adduce any evidence from Dr. Lamba and thereby caused the court to view Dr. Lamba's claim as frivolous, unmeritorious, or, at best, nominal;
- (e) They failed to clarify at an early stage, or at all, that Dr. Lamba was not advancing a claim or seeking any relief against the defendants save and except for the First Doctor and Second Doctor;
- (f) They focused on the motions brought against Dr. Gill regarding the COVID-19 Claims and paid insufficient attention to the Anti-SLAPP Motions brought against Dr. Lamba;
- (g) They failed to competently articulate and advance Dr. Lamba's case against the First Doctor, or, alternatively, failed to negotiate a settlement of the claim against the First Doctor to reduce or mitigate Dr. Lamba's costs exposure;
- (h) They failed to recommend that Dr. Lamba drop the claim against the Second Doctor and/or negotiate a discontinuance of that claim to reduce or mitigate her costs exposure;
- (i) Due to the number of defendants the Galati Defendants had named in the Statement of Claim, they lost credibility with the Court;
- (j) They passed off important work to a junior lawyer(s) or staff and failed to vet the said work when they knew or ought to have known that this individual or individuals lacked the requisite competency, skills, and/or training for the work they were undertaking.
- (k) They put their own political ideology and beliefs, especially regarding the COVID-19 pandemic, above the interests of Dr. Lamba; and

- (l) They did not consult with Dr. Lamba regarding the proper strategy to be employed on the Anti-SLAPP Motions and did not take instructions from her regarding same.

18. The motions were argued over a three-day period on September 27, 28 and 29, 2021. The Galati Defendants failed to recommend that Dr. Lamba attend court for the motions and, as a result, she did not attend, which further adversely affected the optics of her claim.

19. On February 24, 2022, the Court released its decision (the “Motion Decision”). It granted all of the Anti-SLAPP Motions, including the motions of the First Doctor and Second Doctor against Dr. Lamba. With respect to the First Doctor’s motion in particular, the motion judge noted that Dr. Lamba, through the Galati Defendants, had focused primarily on insulting words, which are not actionable. The motion judge further took a dim view of the absence of any affidavit evidence from Dr. Lamba and found that the harm she had suffered was not sufficiently serious such that the public interest in allowing the claim to proceed outweighed the public interest in protecting the First Doctor’s expression.

20. Dr. Lamba pleads and relies upon the Motion Decision.

### **The Appeal and Cost Submissions**

21. The Galati Defendants failed to provide Dr. Lamba with a copy of the Motion Decision. Instead, she learned of the decision from Dr. Gill.

22. The Galati Defendants served and filed a Notice of Appeal on behalf of Drs. Lamba and Gill. The Galati Defendants failed to communicate with Dr. Lamba regarding the merits of the appeal or the strategy to be employed thereon. They also failed to obtain Dr. Lamba’s instructions regarding which parties to appeal against and the grounds for appeal. Instead, the Galati

Defendants advised Dr. Lamba that they did not require her to review the Notice of Appeal before it was served and filed.

23. The Notice of Appeal was deficient in setting out the grounds of appeal and it compounded the error of suing the Second Doctor by appealing the Motion Decision *vis-à-vis* the Second Doctor.

24. The Galati Defendants also delivered boilerplate and deficient cost submissions, which left Dr. Lamba potentially jointly and severally liable for the full indemnity costs of all defendants, including the Gill Defendants whom she had never intended to sue.

25. The defendants delivered cost submissions, in which all or some of the Gill Defendants asserted that Dr. Lamba was jointly and severally liable for the costs of the Gill Defendants due to the way in which her claim had been pleaded in the Statement of Claim and the absence of any or sufficient clarification by the Galati Defendants in the course of the Anti-SLAPP Motions.

26. After serving and filing a deficient Notice of Appeal and deficient cost submissions, the Galati Defendants moved to get off the record and left Dr. Lamba in the lurch. They did not provide her with names of alternative counsel with competency or expertise in defamation law, and, as a result, she was forced to scramble to obtain new counsel.

### **Mitigating Dr. Lamba's Damages**

27. After Dr. Lamba retained new counsel, she sought to mitigate the extensive damages caused by the Galati Defendants and the potential for even more significant damages. She incurred significant legal costs in this respect.

28. Dr. Lamba delivered supplementary cost submissions, which, for the first time, argued plainly that she should not be jointly and severally liable for the costs of the Gill Defendants. The supplementary submissions also argued that the First Doctor's and Second Doctor's entitlement to costs should be reduced. These supplementary submissions were necessary to mitigate the damages the Galati Defendants had caused, but they forced Dr. Lamba to incur significant additional legal costs.

29. On October 31, 2022, the Court delivered its cost ruling the ("Costs Decision"). Due to the supplementary submissions Dr. Lamba had delivered, the Court found in favour of Dr. Lamba on the issue of joint and several liability for the costs of the Gill Defendants. The Court also agreed that certain discounts should be applied to the full indemnity costs of the First Doctor. However, the Court found that Dr. Lamba was jointly and severally liable for the full indemnity costs of the First Doctor and Second Doctor.

30. By Order dated July 19, 2023, the Court ordered that Dr. Lamba was jointly and severally liable for the First Doctor's costs in the amount of \$88,247.24 and for the Second Doctor's costs in the amount of \$73,176.71.

31. Dr. Lamba delivered a Fresh as Amended Notice of Appeal, which cured the significant defects in the Notice of Appeal filed by the Galati Defendants. She also abandoned the appeal of the Motion Decision against the Second Doctor, after learning that she never had a meritorious claim against the Second Doctor. She maintained an appeal against the Second Doctor only with respect to the Costs Decision.

32. Dr. Lamba was able to mitigate the damages caused by the Costs Decision. However, she was required to incur significant legal fees to do so. She entered into confidential settlements with the First Doctor and Second Doctor and abandoned her appeals against both prior to the hearing.

### **Liability of the Galati Defendants**

33. The Galati Defendants are liable for the torts of breach of fiduciary duty and professional negligence. By virtue of their solicitor-client relationship with Dr. Lamba, the Galati Defendants had a fiduciary relationship with Dr. Lamba and owed Dr. Lamba fiduciary duties and a duty of care. They committed flagrant breaches of their duties. Without limiting the generality of the foregoing, the Galati Defendants directly or indirectly committed the following breaches:

- (a) They improperly commenced a claim against the Second Doctor.
- (b) They failed to advise Dr. Lamba of the risks in commencing a defamation action in the Province of Ontario, including the very real potential for an adverse full indemnity costs award and further reputational damage.
- (c) They failed to pursue a genuine apology from the First and Second Doctors, which would have mitigated damages and potentially rendered an action unnecessary.
- (d) They failed to properly and competently articulate, advance, and argue a meritorious claim against the First Doctor.
- (e) They joined Dr. Lamba's claim to Dr. Gill's COVID-19 Claims, when they knew or ought to have known that this would taint Dr. Lamba's claims or adversely affected the optics of Dr. Lamba's claim, and would also the reputation of Dr. Lamba and cause her to be viewed with disrespect, hatred or contempt by members of her profession and members of the public.
- (f) They caused Dr. Lamba to be potentially liable for the costs of the Gill Defendants on a joint and several basis, which required significant additional legal costs to remedy.
- (g) They employed and/or relied upon junior lawyers, staff, and other employees who lacked sufficient competency, skills, and training for the tasks they were undertaking.

- (h) They held themselves out as experts in the field of defamation law, when they knew or ought to have known that they, in fact, lacked any such expertise.
- (i) They failed to provide Dr. Lamba with competent advice and recommendations.
- (j) They failed to communicate with Dr. Lamba in a regular, open, and clear manner.
- (k) They failed to take instructions or informed consent from Dr. Lamba on important steps in the litigation.
- (l) They placed their own interests, beliefs, and/or ideology above the interests of their client, Dr. Lamba.
- (m) They acted for Dr. Lamba when they knew or ought to have known that they were in a conflict of interest due to their own beliefs and activism on the issue of the COVID-19 Pandemic.
- (n) They committed flagrant breaches of their duties owed to Dr. Lamba pursuant to the *Rules of Professional Conduct*.
- (o) They drafted, prepared, and issued a highly deficient Statement of Claim, for the reasons set out above.
- (p) They committed numerous errors and breaches in defendants the Anti-SLAPP Motions, for the reasons set out above.
- (q) They failed to provide Dr. Lamba with a copy of the Motion Decision in a timely manner.
- (r) They prepared and delivered deficient cost submissions for the reasons set out above.
- (s) They prepared and delivered a deficient Notice of Appeal, for the reasons set out above.
- (t) They abandoned Dr. Lamba's case at a critical time.
- (u) They generally acted as incompetent legal counsel in advancing and protecting Dr. Lamba's interests.
- (v) Such further particulars as counsel for the plaintiff will advise.

34. In addition or in the alternative, the Galati Defendants are liable for breach of contract. The conduct set out above also constitutes a breach of express or implied terms of the retainer agreement entered into between Dr. Lamba and the Galati Defendants.

35. The Galati Defendants knew or ought to have known that their flagrant breaches and conduct set out above would cause Dr. Lamba damages.

### **Damages**

36. As a result of the breaches and conduct of the Galati Defendants described above, Dr. Lamba suffered damages and losses, the particulars of which will be provided in advance of the trial of this action.

37. Dr. Lamba's damages, include, but are not limited to:

- (a) Pain and suffering;
- (b) The loss of the damages or settlement she would have recovered from the First Doctor had the Galati Defendants not committed the breaches set out above;
- (c) Significant legal costs to mitigate the potentially astronomical costs/damages caused by the Galati Defendants and the Costs Decision;
- (d) Loss of professional and personal reputation, being tarnished as an "anti vax" or "anti public health" physician, being the victim of disrespect, hatred and contempt, and experiencing feelings of shame, embarrassment and humiliation, all directly as a result of the Galati Defendants combining and conflating her claim with Dr. Gill's numerous and unrelated COVID-19 Claims;
- (e) The loss of financial, employment and professional opportunities as a direct result of the Galati Defendants combining and conflating her claim with Dr. Gill's numerous and unrelated COVID-19 Claims; and

- (f) Damages, interest and costs that Dr. Gill may be awarded in a claim she intends to bring for contribution and indemnity against Dr. Lamba in respect of the Costs Decision.

38. Dr. Lamba has taken all reasonable steps to mitigate her damages.

39. The conduct of the Galati Defendants has been high-handed and egregious and justifies awards of aggravated. Without limiting the generality of the foregoing, the Galati Defendants:

- (a) Ensured that Dr. Lamba's claims would fail, for the reasons set out above.
- (b) Exposed Dr. Lamba to a seven-figure costs award, and did so for no benefit and without advising Dr. Lamba of this significant risk.
- (c) Knew or ought to have known that by combining or conflating Dr. Lamba's claim with Dr. Gill's numerous COVID-19 Claims, she would be exposed to hatred and contempt, and suffer a loss of reputation and earning capacity for being labelled an "anti-vax" or "anti-public health" physician.
- (d) Took significant actions without Dr. Lamba's instructions or informed consent.
- (e) Knowingly placed their own desires and interests above those of Dr. Lamba, and knowingly represented Dr. Lamba while in a conflict of interest.

**Statutes, Misc,**

40. Dr. Lamba pleads and relies upon the *Courts of Justice Act*, *supra*, the *Negligence Act*, R.S.O. 1990, c. N.1, and the *Rules of Professional Conduct*.

41. Dr. Lamba proposes that this claim be tried in the City of Toronto.



February 14, 2024

**JORDAN HONICKMAN BARRISTERS**

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Lawyers for the Plaintiff

DR. ASHVINDER KAUR LAMBA

Plaintiff

-and-

ROCCO GALATI and ROCCO GALATI LAW FIRM  
PROFESSIONAL CORPORATION

Defendants

Court File No. *2000*

*Cv-24-60714780-*

ONTARIO  
SUPERIOR COURT OF JUSTICE  
PROCEEDING COMMENCED AT  
TORONTO

STATEMENT OF CLAIM

JORDAN HONICKMAN BARRISTERS  
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CERTIFIED TO BE A TRUE COPY THE ORIGINATING PROCESS ISSUED HEREIN	COPIE AUTHENTIQUE CERTIFIÉE ET CONFORME À L'ACTE INTRODUCTIF D'INSTANCE DÉLIVRÉ CHANCÉLIER
DATED: <i>February 14</i>	FAIT LE: <i>20 24</i>
SOLICITOR FOR THE AVOCAT POUR LE <i>PER / PAR: BJD</i>	

