

Court File No.: CV-18-00608665-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

MANDIE EDDIE

Plaintiff

- and -

ROBERT LEPP (aka BOB LEPP)

Defendant

AMENDED STATEMENT OF CLAIM

TO THE DEFENDANTS

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiffs. 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 plaintiffs' lawyer or, where the plaintiffs do not have a lawyer, serve it on the plaintiffs, 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.

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: Issued by: _____
Local Registrar

Address of Court Office:

393 University Avenue

10th Floor
Toronto, Ontario
M5G 1E6

TO: ROBERT LEPP
227 Orchard Heights Blvd.
Aurora, Ontario
L4G 5A5

CLAIM

1. The Plaintiff claims against the Defendant:
 - a. The sum of \$850,000 as general damages for defamation, injurious falsehoods, intentional interference with economic relations, invasion of privacy;
 - b. Special damages in an amount to be determined at trial;
 - c. The sum of ~~\$50,000~~ \$250,000 as aggravated damages;
 - d. The sum of ~~\$50,000~~ \$100,000 as punitive damages;
 - e. An interlocutory and permanent injunction requiring the immediate removal and/or deletion of the Posts (hereinafter defined) including all comments posted by any third parties to the Posts, and preventing the Defendant from publishing any further defamatory material regarding the Plaintiff;
 - f. Pre and post-judgment interest pursuant to the *Courts of Justice Act*;
 - g. The Plaintiff's costs of this action on a substantial indemnity scale and;
 - h. Such further and other relief as to this Honourable Court seems just.

THE PARTIES

2. The Plaintiff is an individual residing in the City of King, in the Province of Ontario. During the relevant time, the Plaintiff was also known by her, then, married name, Mandie Crawford.

3. Between April 6, 2015 and February 28, 2018, the Plaintiff was the Manager of Bylaw Enforcement for the Town of Aurora. From April 3, 2018 to October 10, 2018 the Plaintiff was a Municipal By-Law and Property Standards Officer with the Town of Erin.
4. The Defendant is an individual residing in the City of Aurora, in the Province of Ontario. The Defendant maintains a blog at boblepp.com that was used to publish many of the defamatory Posts described herein.

BACKGROUND

5. In late January 2018, the Defendant began to contact the Plaintiff, in her role as By-Law Officer with the Town of Aurora regarding certain changes that he deemed necessary regarding *inter alia* the licensing of cats and dogs by the Town of Aurora and other by-laws related to pet ownership. The Defendant also opined at length about changes that he believed necessary in the regulation of pets.
6. Over the next several months, the Defendant sent more than thirty (30) emails to the Plaintiff setting out his opinions on Aurora by-laws.
7. On June 3, 2017, the Defendant was attending an event for pet owners held at Sheppard's Bush park in the Town of Aurora (the "Event"). The Defendant also brought his two dogs to the Event.
8. The Defendant was engaged in conversation with various event participants. The Defendant was also taking pictures of the event for Google Earth. To facilitate his photography, he tied his two dogs to a pole.
9. During the course of the event, the Defendant's dogs became untied and ran across part of the event area.

10. The Plaintiff issued a ticket to the Defendant for permitting a dog to run at large. The Plaintiff exercised her discretion not to ticket the Defendant for both dogs running at large.
11. The Defendant fought the ticket. Despite his admission of guilt at pre-trial and pleading guilty, he was able to reduce the fine to \$1.00.

DEFAMATORY POSTS

12. Not being satisfied with his right to fight the ticket and reduce the fine, between June 3, 2017 and August 31, 2018, the Defendant commenced and intensive, malicious and false online and email campaign containing defamatory statements (the "Posts") that were calculated to cause damage to the Plaintiff and to cast the Plaintiff in a bad light.
13. The malicious and false statements published by the Defendant constitute defamation.
14. Moreover, the Defendant commenced and intensive, malicious and false online and email campaign containing defamatory statements that were calculated to cause the Plaintiff to lose her job.
15. The Defamatory Posts portrayed the Plaintiff in a severely negative light and harmed her reputation.
16. The Defamatory Posts were malicious given that the Defendant falsely represented himself as an innocent victim, never provided a balanced story, identified the Plaintiff by name and widely disseminated the posts. The Defendant made misstatements, omitted facts and used offensive and inflammatory language to impugn the Plaintiff's reputation and cause harm to her career.

17. The Plaintiff pleads that the Defendant bragged on line that he would cause the Plaintiff to lose her job. Moreover, after the loss of her position with the Town of Aurora, the Defendant bragged online that he had been responsible for her losing her job.

18. The Posts are too numerous to restate here and are fully known to the Defendant. In certain cases, other individuals posted defamatory statements relying on the Defendant's original misrepresentations.

a. **February 24, 2017 Blog Post with Subject Line – Keeping An A [sic] Eye on Aurora Ontario Politics**

She[Mandie] was so unhappy [with my direct statements of numbers from her own town officials showing how she loses \$250,000 minimum every year by not doing her job] she found a way to fight back, so June 3 in Sheppard's Bush soccer fields at her own Dogs In The Park public relations event she targeted me by my face and issued me a 'permit to run at large' ticket for one of my two dogs leashed together who ran 20 feet under my voice and hand controls.

b. **June 3, 2017 Blog Post with Subject Line – Bylaws Cites me one \$300 ticket for two dogs**

Out of the crowd came a shriek from Mandy Crawford, the lead officer in a full flying squad of bulletproof vested officers on duty showing taxpayers the softer kinder side of their jack boots and all black tactical uniforms.

...

I suggested to her that maybe yelling at me at the top of her lungs among the vast assembled dog ownership of Aurora, including sensitive small children and one very large police dog, was not the best way to get lovey-dovey with taxpayers...

...

Mandy advised me with a face full of rage and a screaming voice that she could ticket me for my dogs cleverness and Houdini like moves with a knotted rope.

...

'You have been served' she said as she jammed papers into my bag, an assault if there ever was one.

c. July 22, 2017 Email to All Aurora Town Councillors Subject: Current Status of my Auroran criminal charges by Mandie Eddie

Mandie Eddie and her 1287 attacks on taxpayers in 2016 per the Region of York.

...

I had told them clearly that Mandie is using her 'ex-police officer at Halton' history to invoke the benefits of the 'thin blue line' to coerce her YRP drinking buddies to charge me without a thorough investigation of her illegal Provincial Offenses ticketing protocol...

d. July 27, 2017, Blog-Post Subject Line Alison Colins-Mrakas, open letter , "lies" article in the Auroran.

Mandie/Eddie Crawford, ...refused multiple requests to show her badge or to verbally identify herself.

...

Mandie Eddie, as a private citizen, lied and swore out criminal complaints of uttering threats and harassment by telephone against me and I was arrested. She lied to YRP about the email exchanges she asked me for in each response. She is an ex cop and is a drinking buddy to YRP.

...

She wanted me muzzled from telling or asking town staff about the missing \$5.5 million EVERY YEAR. She wants to be able to tell me "It's in

legal”

e. Email dated August 16, 2017 to Doug Nadorozny, Jeffrey Brown, Paulo Da Silva, Mayor and Aurora Councillors Subject Line – Evidence from YRP versus Bob Lepp, August 22, 2017 Mandy CRAWFORD/Eddie, sexually abused, life long depression

I look forward to the police dropping criminal charges against me made by a woman with a very troubled past.

...

Her [Mandie Eddie's] troubled depressive background.

...

She litigates at will. She spends my taxes taking taxpayers to court. She has been accused July 14... of vexatious, double jeopardy litigation in Superior Court before Justice Mullins.

...

Mandie has already told people she hears voices.

...

She recently underwent a name change. It likely bothered her and her sleep and social drinking habits... Depressives on medication are not to consume ANY alcohol...

She worried, she drank, maybe she lost sleep. Who knows what triggers depressive bouts?

She was certainly not in a normal state when she assaulted me in Sheppard's Bush June 3. ... Bizarre and now I know why.

...

Her lifelong depression (treated??) and teenage sexual abuse make her what she is today. That affect her attitudes toward men and emails from men. They cause her to react “differently” to men who email her simple social media posts back to her. That was me.

Psychotic Depression by National Institute of Mental Health article

inserted

There's depression, which if you have depression, most people have. And then there's psychotic depression or more technically known as major depressive disorder with psychotic features. This is a far less common disorder than simple depression.

...Often psychotically depressed people become **paranoid** or come to believe that **their thoughts are not their own**...or that **others can 'hear their thoughts**...[Emphasis added by Defendant to article]

...those with psychotic depression are **usually aware that these thoughts aren't true**. They may be **ashamed or embarrassed and try to hide** them sometimes making this variation difficult to diagnose. [Emphasis added by Defendant to article]

...

I hope she has not stopped her medications.

...

She feared that I had started to discover her depression, her failed police career, becoming a "professional closet organizer" when she quit the force due to depression.

f. Sept. 5, 2017 Youtube video and comments Subject- Mandie Crawford/Eddie Returns From the Hunt!

She swore out a ticket without asking me for any ID at all. She used her own database of troublemakers to get my nickname, a partial street name and no postal code.

g. October 11, 2017 Blog Post – Subject Line – Victory Over Mandie Eddie in Bylaws Court!

To be fair, I admitted very early on that indeed the dogS did get loose for 10 seconds.

...

So I volunteered to end it all and plead guilty and pay whatever they felt appropriate...

...

Tomorrow I attend Criminal Court on Mandie's other fabricated charges...

... I will start my new email campaign now.

19. Even after pleading guilty and being fined, the Defendant continued to post and publish defamatory statements. The post-conviction Posts are too numerous to restate here and are fully known to the Defendant. In certain cases, other individuals posted defamatory statements relying on the Defendant's original misrepresentations.

a. October 12, 2017 – Blog Post – Subject Line – Recreating reality for a Bylaws Court

She has never lifted a finger in response to any suggestion...we are still missing \$250,000 every year.

b. November 4, 2017 Blog Post – Subject Line – I won

November 3, 2017 about 1:00 pm, judge Johnson banged her virtual gavel and I was free at last.

c. November 13, 2017 Blog Post – Subject Line – Open email to Junko Skanes, MH/Cust. Svc. MGR at Tok Transit

Mandie hates me. I keep telling everyone how much money she loses each year by failing to sell pet tags, \$300,000, so Mandie hates me.

...

She wants to "win" against me, she does not want to keep YOUR passengers safe. Further, she appears to badly want YOUR drivers to be

sued when someone they let off in the street gets injured or worse. She cares only that she NOT have to send her SWAT team officers to write parking tickets because that would make me happy. She does not want me happy, she wants me in jail, she told me that effectively upon my arrest, because that is where they put me after the body cavity search.

d. December 13, 2017 Blog Post – Subject Line – Open Letter to the Dean of Niagara College’s Canadian Food and Wine Institute

Be aware Bylaws Manager Mandie Eddie has been proven as a liar in court documents in both POA and Superior court cases and has been sued TWICE for vexatious litigation. Those 2 suits will not be the last. She has a falsified resume on LinkedIn....

...

Over a stupid dog park, they conspired to have Bylaws Manager Eddie use her ex-cop connections to get me arrested on bogus Criminal Charges to punish me financially.

e. December 15, 2017 Blog Post – Subject Line –Open Letter to Mike Walters, CAO of LSRCA, after admitting I was right about the fences!

Mandie Eddie targeted me in your Sheppard’s Bush soccer park because of my blogging about your LSRCA’s complete lack of compliance inspections ...

...

Mandie Eddie improperly nailed me for a \$305 ticket, my dogs were loose 10 seconds

....

She targeted me for my blog...

...

force, and pointed it at people like me who stand up to her lies.

...

Her resume was faked to get the Manager job in Aurora after being just a volunteer fireman in the Rockies.

...

She is now not to be believed in EITHER court since she has proven to be a liar incapable of taking the stand as a witness in ANY case. I'll be making sure of that.

... Mandie and her lies are the cause for my arrest...

f. January 1, 2018 Blog Post – Subject Line – BL 18-01 Open Letter Asking For Canine Commons To Get A Trash Container

Bylaws Manager Mandie Eddie has **no business background to understand the finances in play...** [Emphasis in original]

g. January 8, 2018 Blog Post – Subject Line – BL 18-08 Bob Lepp, activist, organizes his blog for easy future criminal investigation

What I do is embarrass people out of their pattern of ignoring taxpayers.

...

I will continue to blog and report the public domain information she [the Plaintiff] has published about herself, her background, her mental health especially... to her followers and to potential employers.

...

From 2004 to 2013 Mandie CRAVED being read about, noticed, blogged

about, written about. ... THEY PAID HER to make up stories for press

releases, web pages, videos, radio interviews, newspaper articles. She was a one person, kitchen table based, small-time advertising agency for stay at home Moms across Canada.

She made a living for 9 years making up stuff about people she had only ever met over the telephone. Then she had a nervous breakdown and had to quit.

...

She is someone who lied 42 times to two courts to have me arrested...

I will stop when I have completed legal proceedings about her.

...

Mandie cost Auroran's \$300,000 every year by not doing her job.

h. January 15, 2018 Blog Post – Subject Line – BL 18-013 PET-approved Councillors and Mayor for Aurora 2018

Mandie pursued Denis and his wife Anne-Marie for 24 court appearances in a 4 year period over a sticky gate latch by his pool. She lost ALL the charges she fabricated when the judge ruled he could not trust her as a witness...Mandie heard about this desire to disparage her and she simply REFILED every charge she had lost.

...

He [Paul Pirri] wanted to feed Mandie's depression-induced paranoid "fear" of me....

...

Mandie recorded over 40 minutes of 42 lies about me around noon July 14...

i. January 28, 2018 Blog Post – Subject Line – BL 18-42 Unauthorized free newspaper delivery to homes should be banned...

...

Am I angry? No, chagrined. A polite French word meaning I am so pissed off I will get revenge.

j. January 1, 2018 Blog Post – Subject Line – BL 18-51 Ontario Ombudsman to investigate January 23, 2018 ejection from Council

... she falsely and maliciously charge me to York Regional Police, over her slanderous and libelous lies in getting me falsely criminally arrested...

...

Mandie is an ex-cop and she offered she could use that connection to get me arrested on the flimsy evidence she was purported to possess. .. It was all lies...

k. March 29, 2018 Blog Post – Subject Line – BL 18-60 KUDOS!! And Accolades to Bylaws for dog enforcement

Note: Mandie broke her own bylaws PAYING Docupet...

...

\$300,000 per year was lost by Mandie Eddie.

l. March 31, 2018 Blog Post – Subject Line – BL 18-63 Brad T Cran, TAOCRAN Law (his kids' initials)...

Mandie no longer has a job. See, she lied to police about me harassing her by emails and after threatening to call her police buddies to arrest me, July 14, she lied to police and I was arrested,Mandie had lied to them [the police], they believed her, arrested me, THEN went looking for

m. April 21, 2018 Blog Post – Subject Line – BL 18-66 Plans to survey again the Tina Jayne Duncan fence line....

The woman who lied to bring the false charges is no longer employed. She lied to the police and she is before the courts of Newmarket now,...

The charges were false and the charges were put down....The police simply believed the many lies of the Town employee, ex-copy Mandie Eddie ...

...

You have chose to believe the lies Mandie Eddie initiated about me for her own personal gains.

...

Mandie Eddie is gone in disgrace...

...

She got caught up in her lies.

n. April 26, 2018 Blog Post – Subject Line – BL 18-78 TAOCRAN (his children’s initials) is scrambling now

I have sued Mandie Eddie for lies and slander getting me arrested.
[Emphasis in original]

Mandie Eddie is NO LONGER AN EMPLOYEE. [Emphasis in original]

20. The Defendant continued to post statements about the Plaintiff after her she was no longer employed with the Town of Aurora. When the Plaintiff obtained employment with the Town of Erin, the Defendant continued to post blogs and publish defamatory statements and to send defamatory statements directly to Town of Erin municipal officials and employees. The Posts which were published after the Plaintiff commenced employment with the Town of Erin are too numerous to restate here and

are fully known to the Defendant. In certain cases, other individuals posted defamatory statements relying on the Defendant’s original misrepresentations.

a. **June 7, 2018 Email to Allan Ails, Town of Erin Subject Line: From a “friend of a friend”, he is ex-AC pilot....**

We also hired your Bylaws Manager, Mandie Eddie... She is now your new parking ticket writer. I discovered many lies in her past from her LinkedIn resume alone. Then I uncovered a missing \$300,000 every year due to her failure selling simple pet tags to 14,000 pets in town.

...

Mandie is being sued by at least two of us in Aurora. The other suit is for vexatious litigation. 4 years and over \$120K spent pursuing a sticky gate latch. She lost. She refiled identical charges. My suite is for lies, slander and providing false evidence to police on video about me.

....

All of them allowed lies of one very flawed person, Mandie, to ruin my life.

...

Mandie claimed “2010 Calgary Business Woman of the Year.” I phoned Calgary. They never heard of her.

...

She blogged everything about herself. Her lifelong mental illness, depression giving up police work because of a breakdown... that ended in an another apparent collapse...

...

Luckily for me, Aurora finally listened to me about her many failings and in February she was gone, either she quit or she was fired.

....

But her history shows she creates a new “persona” after ever breakdown.

...

b. **July 31 , 2018 Email to Allan Ails of the Town of Erin, Subject Line: Mandie Eddie LinkedIN**

...she describes herself as a "Manager" when she had NEVER managed people before Aurora. She simply lied about everything in her resume. She did not reveal 3 nervous breakdowns on the job.

...

One [constituent] has been told by Mandie that she can avoid a bylaw order about her pool enclosure by using Mandie's boyfriend as a contractor to build one. This is simply highly improper and unusual....

...

I would humbly suggest you to be very cautious about your interactions with her.

c. July 26, 2018 Blog Post Subject Line BI 18-101 Aurora Votes 2018: Harold Kim wants to continue...

I got Mandie fired, found all her lies. You did nothing. She is in Erin knowing offering to waive citations if people use her boyfriend to build fences. Ture. Get calls about Bylaws past and present because of my blog.

...

I helped Mandie find \$300,00 per year for free. She arrested me.

d. July 30, 2018 Blog Post Subject Line BI 18-104 To Aurora's Insurer's Adjusters...

She will not last [Town of Erin] long there either. I get phone calls from Erin people who find my blog mentioning her names many times.

...

Everything she touched is not to be trusted.

e. August 19, 2018 Email Addressed to the Mayor and Councillors, Town of Aurora with a Subject Line: BL17-102 – Canine Commonsd [sic] Supervision.

Ms. Eddie “has been admonished twice in Erin for soliciting bribes in the form of giving work to her boyfriend to avoid pool fence tickets.”

21. The statements in the Posts are false and intended to deceive others. The statements in the Posts were targeted to *inter alia* cause the Plaintiff to lose her employment and to prevent her from gaining subsequent employment. Specifically the following false representations were made:

- a. The Plaintiff is dishonest;
- b. The Plaintiff is corrupt;
- c. The Plaintiff misused her position as a Bylaws Officer to target specific individuals and to carry out a personal vendetta;
- d. The Plaintiff is incompetent;
- e. The Plaintiff is not qualified for her employment positions;
- f. The Plaintiff has mental health issues that prevent her from fulfilling her employment functions;
- g. The Plaintiff has mental health issues that make her a danger to others;
- h. The Plaintiff is medicated;
- i. The Plaintiff creates a societal danger by mixing medication and alcohol; and
- j. The Plaintiff has solicited bribes.

22. The Plaintiff relies on the natural and ordinary meaning of words, which are *prima facie* defamatory and untrue

23. Further, the Defendant’s defamatory words were meant to suggest that the Plaintiff is deceitful and has mental health issues that prevent her from performing her employment duties. The statements were made with the intent to demean, embarrass and bully the Plaintiff into withdrawing the ticket and to cause the Town to

embarrass and bully the Plaintiff into withdrawing the ticket and to cause the town to see the Plaintiff as a liability so that they would terminate her employment.

24. Subsequent to the Defendant pleading guilty to the ticket and being fined, the Posts were made with the intent to demean, embarrass the Plaintiff and her employers and cause the Plaintiff's employers to terminate her employment.

25. Given that Aurora and Erin are a small, tight-knit communities, the Defendant created a level of notoriety with his defamatory statements to increase the damaging effect of the Posts.

26. The Posts were published in the sense that they were communicated to others.

27. The Posts were untrue and done with malicious intent at the time there were made, were made without any benefit of privilege and were not made on a matter of public interest or fair comment. Any notoriety gained by the dispute was only as a result of the Defendant's wrongful Posts.

28. The Plaintiff pleads that the Defendant is not entitled to rely upon the *Protection of Public Participation Act, 2015* and section 137.1 of the *Courts of Justice Act, R.S.O. 1990, c. C. 42* to absolve himself of liability given that this action involves a private dispute that has no wider application than the dispute related to the Sheppard's Bush park incident.

29. In the alternative, if the within action is deemed to involve a public dispute, the Plaintiff pleads the defences available under the legislation and that the Posts by the

Defendant go beyond the purposes of the legislation.

30. The Defendant has encouraged the replication of, and commenting upon, the Posts by third parties. The Defendant knew, or ought to have known, that this

republication and commenting by others would quickly occur and would cause further damage to the Plaintiff.

31. On August 29, 2018, the Plaintiff sent the Defendant a letter requesting that the offending statements (the "Posts") be retracted and apologies offered. To date, the Defendant has wrongfully refused to retract or apologize for the Posts.

32. Full particulars of all the defamatory Posts known to the Plaintiff will be disclosed in the within action. Further particulars of other Posts are within the knowledge of the Defendant.

33. As a result of the defamatory Posts, and all repetitions and republications of them, and comments by others thereon, the Plaintiff's character has been injured, and the Plaintiff has had a fear of personal violence and property damage.

34. As a result of the defamatory Posts, and all repetitions and republications of them, and comments by others thereon, the Plaintiff has had her employment terminated with the Town of Aurora.

35. As a further result of the defamatory Posts, and all repetitions and republications of them, and comments by others thereon, the Plaintiff subsequently had her employment terminated with the Town of Erin.

INVASION OF PRIVACY

36. In addition to making the defamatory statements, the Defendant, on repeated occasion, since at least June 3, 2018, has intentionally interfered with the Plaintiff's privacy by posting pictures of her online and by publishing the defamatory Posts.

37. The Plaintiff had a reasonable expectation of privacy that detailed images of her, including images not visible and/or readily visible to the public, would not be posted online. These images continue to be hyperlinked to the defamatory Posts. The Defendants has invaded the Plaintiff's reasonable expectation of privacy and caused her feelings of insecurity and anxiety.

38. The Plaintiff states that the Defendant is well-known to the local community, including the municipal authorities and police services, as a menace, a serial harasser and public nuisance.

39. As a result of the Posts, defamation, injurious falsehood and invasion of privacy, the Plaintiff has suffered and continues to suffer damages for which the Defendant is liable including injury to reputation, mental distress, anxiety, loss of employment and loss of career opportunities.

40. The Plaintiff pleads that the Defendant has acted with malice and in a high-handed manner, thereby warranting an award of punitive and aggravated damages.

41. The Plaintiff pleads that she is entitled to special damages on account of additional expense incurred as a result of the Defendant's conduct, including but not restricted to legal fees.

42. Full particulars of all damages including special damages will be provided in advance of trial.

43. The Plaintiff pleads and relies upon the *Libel and Slander Act*, R.S.O. 1990, c. L. 12 and section 101 of the *Courts of Justice Act*, R.S.O. 1990, c. C. 43.

44. The Plaintiff proposes that the trial of this action take place in Toronto.

Date:

March 4, 2021

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LLP

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