

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

MARIA LEE

Plaintiff

and

LUCAS VANDERBURGH and JANE DOE 1 and JOHN DOE 1 and JANE
DOE 2 and JOHN DOE 2 and JANE DOE 3 and JOHN DOE 3 and
TIMOTHY MCKENZIE and FORBES CARRIAGE WORKS LTD. and
FORBES CARRIAGE WORKS LTD. operating as FORBES WATERLOO
MAZDA and 2334052 ONTARIO INC. and 2334052 ONTARIO INC.
operating as SAM'S AUTO and ANDY MELO and CITY OF HAMILTON
and MCCORMICK RANKIN and MCCORMICK RANKIN CORPORATION
and MCCORMICK & RANKIN LIMITED and MMM GROUP LIMITED and
HER MAJESTY THE QUEEN IN RIGHT OF THE PROVINCE OF
ONTARIO, represented by the MINISTER OF TRANSPORTATION FOR
THE PROVINCE OF ONTARIO and THE PERSONAL INSURANCE
COMPANY and CERTAS HOME AND AUTO INSURANCE COMPANY
and CERTAS DIRECT INSURANCE COMPANY and THE DOMINION OF
CANADA GENERAL INSURANCE COMPANY and TRAVELERS
INSURANCE COMPANY OF CANADA and THE SUPERINTENDENT OF
FINANCIAL SERVICES

Defendants

and

PAFCO INSURANCE COMPANY, added by Order pursuant
to s. 258(14) of the *Insurance Act*, R.S.O. 1990 c. I. 8

Statutory Third Party

AFFIDAVIT OF DOCUMENTS

I, Stephen Cooper, of the Town of Grimsby, in the Province of Ontario, MAKE
OATH AND SAY:

1. I am a Project Manager, with Traffic Engineering, Public Works Department of City
of Hamilton, one of the Defendants in this Action, which is a corporation.

2. I have conducted a diligent search of the corporation's records and made
appropriate enquiries of others to inform myself in order to make this Affidavit. This
affidavit discloses, to the full extent of my knowledge, information and belief, all

documents relevant to any matter in issue in this action that are or have been in the possession, control or power of the corporation.

3. I have listed in Schedule "A" those documents that are in the possession, control or power of the corporation and that it does not object to producing for inspection.

4. I have listed in Schedule "B" those documents that are or were in the possession, control or power of the corporation and that it objects to producing because it claims they are privileged, and I have stated in Schedule "B" the grounds for each such claim.

5. I have listed in Schedule "C" those documents that were formerly in the possession, control or power of the corporation but are no longer in its possession, control or power, and I have stated in Schedule "C" when and how it lost possession or control of or power over them and their present location.

6. The corporation has never had in its possession, control or power any document relevant to any matter in issue in this action other than those listed in Schedules "A", "B" and "C".

SWORN BEFORE ME at the City of London, in the Province of Ontario on , 2018



Commissioner for Taking Affidavits
(or as may be)

STEPHEN COOPER

LAWYER'S CERTIFICATE

I CERTIFY that I have explained to the deponent,

- (a) the necessity of making full disclosure of all documents relevant to any matter in issue in the action;
- (b) what kinds of documents are likely to be relevant to the allegations made in the Pleadings; and
- (c) if the action is brought under the simplified procedure, the necessity of providing the list required under rule 76.03.

Date: _____

DAVID S. THOMPSON

SCHEDULE "A"

Documents in the corporation's possession, control or power that it does not object to producing for inspection.

Police

7. Motor Vehicle Accident Report dated May 7, 2014
8. Amended Motor Vehicle Accident Report dated May 7, 2014

Rule 30.10 Order dated March 10, 2016 (Lee action)

9. Letter from Ministry of Attorney General enclosing copy of the file produced by Order dated March 10, 2016
10. Motor Vehicle Accident Report dated May 7, 2014
11. Amended Motor Vehicle Accident Report dated May 7, 2014
12. Accident Mapping dated May 7, 2014
13. Collision Reconstruction Field Sketch dated May 7, 2014
14. Slide to Stop Speed and Time Calculations
15. Letter from Ross & McBride to counsel dated May 3, 2016
16. Letter from Hughes Amys to plaintiff counsel dated April 25, 2016
17. Letter from Ross & McBride to counsel dated April 29, 2016
18. Letter from Hughes Amys to Ross & McBride dated April 29, 2016

Rule 30.10 Order dated February 23, 2017 (Lee action)

19. Letter from Ministry of Attorney General to Ross & McBride enclosing Police Investigate File and Crown Brief materials dated April 13, 2017
20. Account from Ministry of Attorney General to Ross & McBride dated April 13, 2017
21. Motor Vehicle Accident Report dated May 7, 2014
22. Amended Motor Vehicle Accident Report dated May 7, 2014
23. Hamilton Crown Attorney Transcript re 911 Communications dated May 7, 2014
24. Hamilton Crown Attorney Transcript re 911 Communications dated May 7, 2014

25. Collision Statement, Lucas Vanderburgh dated May 7, 2014
26. Collision Statement, Sean Adam dated May 7, 2014
27. Collision Statement, Chanel Barlow dated May 7, 2014
28. Witness Statement, Emese (Liz) Bartha dated May 7, 2014
29. Police Notes, PC Saad Keval dated May 7, 2014
30. Police Notes, PC Candace Nzeakor dated May 7, 2014
31. Witness Statement, PC Saad Keval dated May 7, 2014
32. Police Notes, PC Gregory Corriveau dated May 7, 2014
33. Witness Statement, PC Gregory Corriveau dated May 7, 2014
34. Police Notes, PC Brad Lawrie dated May 7, 2014
35. Police Notes, PC Kevin Jones dated May 7, 2014
36. Police Notes, Det Wes Wilson dated May 7, 2014
37. Police Notes, Det Walter Niblock dated May 7, 2014
38. Collision Reconstruction Field Notes, Det. W. Wilson dated May 7, 2014
39. Copies of 95 Colour Photographs dated May 7, 2014
40. Statement, Maria Lee
41. Supplementary Occurrence Report, Report of PC Brad Lawrie dated May 8, 2014
42. Supplementary Occurrence Report, Scene Photographs dated May 8, 2014
43. Witness Statement, PC Candace Nzeakor dated May 8, 2014
44. Witness Statement, PC Kevin Jones dated May 8, 2014
45. MTO Vehicle Record, Lucas Vanderburgh dated May 8, 2014
46. Witness Statement, Camille Griffin dated May 9, 2014
47. Witness Statement, Det Walter Niblock dated May 14, 2014
48. Letter from Locke St. Tire and Automotive dated May 15, 2014
49. Vehicle Mechanical Report dated May 15, 2014

50. Letter from NV Auto dated April 17, 2013, together with invoice dated February 23, 2013
51. Letter from Robert Bernacci, Automotive Technician dated March 11, 2014
52. Letter from Hamilton Police Service re Robert Bernacci, Automotive Technician dated March 11, 2014
53. Statement, Payton Wood (typed) dated May 15, 2014
54. Witness Statement, Payton Wood dated May 15, 2014
55. Witness Statement, Dorothy Kolios dated May 16, 2014
56. MTO Vehicle Record, Lucas Vanderburgh dated May 26, 2014
57. MTO Driver Record, Lucas Vanderburgh dated May 27, 2014
58. Hamilton Crown Attorney Transcript re Interview of Lucas Vanderburgh dated June 10, 2014
59. Witness Control
60. Involved Person Summary
61. Crown Synopsis dated June 10, 2014
62. Offence Record Report dated June 10, 2014
63. MTO Extended Driver Record Search for Criminal Code Convictions re Vanderburgh dated June 11, 2014
64. Supplementary Occurrence Report, Det. Troy Ashbaugh Will State dated June 11, 2014
65. Witness Statement, Det Wes Wilson dated July 2, 2014
66. MTO Driver Record, Lucas Vanderburgh dated July 7, 2014
67. Supplementary Occurrence Report, Andy Melo Expected Will Say dated July 11, 2014
68. Accident Reconstruction Report, Jenish Forensic Engineering dated September 7, 2016
69. MTO Driver Record, Lucas Vanderburgh dated November 21, 2016
70. 95 Colour Photographs dated May 7, 2014

71. 911 Calls
 1. B14596859.wav
 2. C14596859CALL2.wav
 3. D14596859CALL3.wav
 4. E14596859CALL4.wav
 5. F14596859CALL5.wav
 6. G14596859CALL6.wav
 7. H14596859CALL7.wav
 8. I14596859CALL8.wav
 9. J14596859CALL9.wav
 10. K14596859CALL10.wav
 11. B14596857CALL.wav

Criminal Proceedings

72. Transcript: Proceedings at Guilty Plea re Lucas Vanderburgh dated November 21, 2016
73. Transcript: Criminal Code Proceedings re: Lucas Vanderburgh dated March 17, 2017

City of Hamilton Documentation

Council Meetings, Minutes and Reports

74. Hamilton Transportation Master Plan dated May 2007
75. Report to Public Works Committee re PW13081 - RHVP Improvements dated November 18, 2013
76. Public Works Committee Report 13-014 dated November 18, 2013
77. Report to General Issues Committee re: PW13080 - Advertising Program on LINC and RHVP Report dated November 20, 2013
78. General Issues Committee Report 12-024 dated November 20, 2013, as amended and approved by Council November 27, 2013, as further amended and approved by Council December 11, 2013

79. General Issues Committee Report 13-024 dated November 20, 2013, as amended by council November 27, 2013, as further amended by council December 11, 2013
80. Memo re 2014 Capital Budget Requests for a Traffic Management System - Linc; Video Detection and Intelligent Transportation; Traffic Signal Communication System - Capital Budget (PW14013) dated January 29, 2014
81. General Issues Committee Budget Report 14-002 dated January 23, 24, 29, February 7, 11, 13, 25, 27, March 4 and 20, 2014, as amended and approved by Council April 9, 2014

Accident History

82. Collision Report for Linc dated 1997 to May 21, 2014

Traffic Counts, Speed Counts

83. Speed Counts for Linc dated February 21, 2011
84. Traffic Counts for Linc at Upper Wellington dated May 7, 2011
85. Speed Counts for Linc dated December 9, 2013
86. Traffic Counts for Linc at Upper Wellington dated December 9, 2013
87. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated December 11, 2013
88. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated December 13, 2013
89. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated December 15, 2013
90. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated December 17, 2013
91. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated December 19, 2013
92. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated December 21, 2013
93. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated December 23, 2013
94. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated December 25, 2013
95. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated December 27, 2013
96. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated December 29, 2013
97. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated December 31, 2013
98. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated January 2, 2014

99. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated January 4, 2014
100. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated January 6, 2014
101. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated January 8, 2014
102. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated January 10, 2014
103. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated January 12, 2014
104. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated January 14, 2014
105. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated January 16, 2014
106. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated January 18, 2014
107. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated January 20, 2014
108. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated January 22, 2014
109. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated January 24, 2014
110. Traffic Counts: Midblock 2013 - Linc at Upper Wellington dated January 24, 2014

Service Request Detail Reports

111. Service Request Detail #2271300 dated April 5, 2010
112. Service Request Detail #2509109 dated January 31, 2011
113. Service Request Detail #2509109 dated January 31, 2011
114. Service Request Detail #2567127 dated April 28, 2011
115. Service Request Detail #2667991 dated September 6, 2011
116. Service Request Detail #2673035 dated September 13, 2011
117. Service Request Detail #2677596 dated September 20, 2011
118. Service Request Detail #2823926 dated May 19, 2012
119. Service Request Detail #2887492 dated August 17, 2012

Work Orders

120. Work Order dated March 9, 2008 re Linc W/B at Garth Street
121. Work Order dated March 23, 2008 re West Linc at Garth Ramp

122. Work Order dated April 8, 2008 re S/S Linc W/of Garth
123. Work Order dated November 18, 2008 re Linc/RHVP ramps and mainline
124. Work Order dated May 6, 2009 re S/B/ E/S ramp to E/B Linc Golf Links Road
125. Work Order dated May 6, 2009 re S/B W/B ramp to Linc Mohawk Road
126. Work Order dated May 6, 2009 re N/B/ E/B ramp to Linc Golf Links Road
127. Work Order dated July 17, 2010 E/B Linc N/S of off ramp to Garth Street
128. Work Order dated April 28, 2011 re E/B Linc at Garth Street off ramp S/S
129. Work Order dated September 7, 2011 re E/B Linc at Garth off ramp
130. Work Order dated September 25, 2011 re Linc W/B S/B Garth Street Exit
131. Work Order dated October 9, 2012 re Linc Golf Links/Mohawk to Linc E/B
132. Work Order dated October 22, 2012 re W/B Linc N/S shoulder side only
133. Work Order dated October 22, 2012 re E/B Linc S/S shoulder
134. Work Order dated October 22, 2012 re E/B Linc
135. Work Order dated October 22, 2012 re W/B Linc
136. Work Order dated October 31, 2012 re E/B Linc W/of Garth
137. Work Order dated November 1, 2012 W/B Linc at Garth
138. Work Order dated November 1, 2012 W/B Linc W/of Garth
139. Work Order dated March 19, 2013 E/B Linc W/of Garth Street off ramp
140. Work Order dated March 20, 2013 re B/S Linc from Garth - Dartnall
141. Work Order dated April 7, 2013 re E/B Linc at Garth ramps
142. Work Order dated June 25, 2013 re W/B Linc (centre median) at Dartnall Road underpass and E/B Linc (centre median) E/of Golf Links Road
143. Work Order dated August 2, 2013 re E/B Linc in advance of Garth Street exit
144. Work Order dated April 23, 2014 W/B N/S Linc E/of Garth Street
145. Work Order dated December 19, 2014 re Hansen #4013832 E/B Linc at Garth exit

Road Patrol Records

146. Index re Patrol GPS Maps dated April 7, 2014 to May 7, 2014
147. Patrol GPS Map for Patrol Vehicle 521114 dated April 7, 2014
148. Patrol GPS Map for Patrol Vehicle 521116 dated April 8, 2014
149. Patrol GPS Map for Patrol Vehicle 521116 dated April 9, 2014
150. Patrol GPS Map for Patrol Vehicle 521119 dated April 9, 2014
151. Patrol GPS Map for Patrol Vehicle 521119 dated April 9, 2014
152. Patrol GPS Map for Patrol Vehicle 521116 dated April 11, 2014
153. Patrol GPS Map for Patrol Vehicle 521116 dated April 14, 2014
154. Patrol GPS Map for Patrol Vehicle 521115 dated April 14, 2014
155. Patrol GPS Map for Patrol Vehicle 521119 dated April 15, 2014
156. Patrol GPS Map for Patrol Vehicle 521115 dated April 15, 2014
157. Patrol GPS Map for Patrol Vehicle 521116 dated April 16, 2014
158. Patrol GPS Map for Patrol Vehicle 521119 dated April 16, 2014
159. Patrol GPS Map for Patrol Vehicle 521115 dated April 16, 2014
160. Patrol GPS Map for Patrol Vehicle 521116 dated April 17, 2014
161. Patrol GPS Map for Patrol Vehicle 521119 dated April 17, 2014
162. Patrol GPS Map for Patrol Vehicle 521117 dated April 17, 2014
163. Patrol GPS Map for Patrol Vehicle 521115 dated April 17, 2014
164. Patrol GPS Map for Patrol Vehicle 521116 dated April 22, 2014
165. Patrol GPS Map for Patrol Vehicle 521119 dated April 22, 2014
166. Patrol GPS Map for Patrol Vehicle 521119 dated April 24, 2014
167. Patrol GPS Map for Patrol Vehicle 521115 dated April 24, 2014
168. Patrol GPS Map for Patrol Vehicle 521119 dated April 25, 2014
169. Patrol GPS Map for Patrol Vehicle 521117 dated April 25, 2014

170. Patrol GPS Map for Patrol Vehicle 521116 dated April 25, 2014
171. Patrol GPS Map for Patrol Vehicle 521119 dated April 28, 2014
172. Patrol GPS Map for Patrol Vehicle 521116 dated April 28, 2014
173. Patrol GPS Map for Patrol Vehicle 521115 dated April 28, 2014
174. Patrol GPS Map for Patrol Vehicle 521119 dated April 29, 2014
175. Patrol GPS Map for Patrol Vehicle 521115 dated April 30, 2014
176. Patrol GPS Map for Patrol Vehicle 521116 dated April 30, 2014
177. Patrol GPS Map for Patrol Vehicle 521117 dated April 30, 2014
178. Patrol GPS Map for Patrol Vehicle 521119 dated April 30, 2014
179. Patrol GPS Map for Patrol Vehicle 521117 dated May 1, 2014
180. Patrol GPS Map for Patrol Vehicle 521119 dated May 1, 2014
181. Patrol GPS Map for Patrol Vehicle 521115 dated May 2, 2014
182. Patrol GPS Map for Patrol Vehicle 521116 dated May 2, 2014
183. Patrol GPS Map for Patrol Vehicle 521115 dated May 5, 2014
184. Patrol GPS Map for Patrol Vehicle 521114 dated May 5, 2014
185. Patrol GPS Map for Patrol Vehicle 521119 dated May 5, 2014
186. Patrol GPS Map for Patrol Vehicle 521119 dated May 5, 2014
187. Patrol GPS Map for Patrol Vehicle 521115 dated May 6, 2014
188. Patrol GPS Map for Patrol Vehicle 521119 dated May 6, 2014
189. Patrol GPS Map for Patrol Vehicle 521119 dated May 6, 2014
190. Patrol GPS Map for Patrol Vehicle 521116 dated May 7, 2014
191. Patrol GPS Map for Patrol Vehicle 521114 dated May 7, 2014
192. Patrol GPS Map for Patrol Vehicle 521119 dated May 7, 2014
193. Patrol GPS Map for Patrol Vehicle 521119 dated May 7, 2014
194. Patrol GPS Map for Patrol Vehicle 521115 dated May 8, 2014

- 195. Patrol GPS Map for Patrol Vehicle 521115 dated May 8, 2014
- 196. Patrol GPS Map for Patrol Vehicle 521115 dated May 8, 2014

Traffic Task Items

- 197. Traffic Task re: B000522 - LINC CMC Review dated February 18, 2015 to September 14, 2015
- 198. Report to Public Works Committee re LINC and RHVP Safety Review dated November 2, 2015
- 199. End to End Collisions "All" vs CMC dated March 13, 2015
- 200. Linc Collisions dated January 6, 2006 to January 29, 2015
- 201. Traffic Task re: Linc Safety Review dated October 31, 2014 to November 26, 2014
- 202. Copy of Linc Median Collisions 2014 update dated November 20, 2014
- 203. Emails re The LINC - collision stats dated December 8, 2010 to January 5, 2011
- 204. Collision Summary for Crossovers on the Linc between the 403 and Dartnall dated November 16, 1997 to November 30, 2010
- 205. Traffic Task re: RHVP- Full Review dated May 22, 2015 to May 6, 2016
- 206. Image of layout for the new speed fine installation signs to be installed on the RHVP/LINC dated May 6, 2016
- 207. City Clerk's Division, Council Follow Up Notice re Council Meeting December 9, 2015 Item 6.6 PW Report 15-016 dated December 10, 2015
- 208. City Public Works Recommendations re Linc and RHVP Safety Review dated December 7, 2015
- 209. CIMA Memo re City's Comments and CIMA's responses re Linc Safety Review draft report dated September 11, 2015
- 210. Collision Case ID List from CIMA dated July 29, 2015

Manuals / Reference Materials

- 211. Design Criteria (taken from the 1990 preliminary design report)
- 212. Excerpt: MTO, Roadside Safety Manual, Chapter 1, Section 1.1, and Section 2.2.1 dated March 1993

Weather Records

- 213. Canada Hourly Data Report for Hamilton dated May 7, 2014

Drawings / Maps

- 214. Drawings - Contract RHW 95-221 (SPO) Mainline Grading: Mohawk/Golf Links Interchange to 700m East of Garth Street dated February 1995, Sheets 1, 32, 33, 41
- 215. Drawings - Contract RHW 95-225 (SPO) Mainline Grading: 700m West of Mohawk/Golf Links Interchange to 100m West of Upper Wellington Street dated August 1996, Sheets G2, G19, G20, G46, G47, G60, M6

CIMA Reports

- 216. CIMA Report, LINC Median Safety Study dated October 2015
- 217. CIMA Report, LINC Median Safety Study dated November 2015

Friction Testing Report

- 218. Tradewind Scientific Friction Testing Survey Summary Report, Lincoln Alexander & Red Hill Valley Parkways (Hamilton) dated November 20, 2013

Media Reports

- 219. Hamilton Spectator: Two critically hurt in Linc crash dated May 7, 2014
- 220. Hamilton Spectator: Two critically hurt in Linc crash dated May 7, 2014

Notice Letters

- 221. Notice Letter from Malhotra Stayshyn to Hamilton dated May 12, 2014
- 222. Notice Letter from Ross & McBride to Hamilton dated May 22, 2014

MEA Forensic

- 223. Lee Mazda - EDR Data dated August 19, 2014
- 224. Melo Hyundai - Genesis Data Report dated September 25, 2014
- 225. EDR Downloads Summary from MEA Forensic dated January 6, 2017

Bannatyne & Company, Independent Adjuster's Photographs

- 226. 20 Photographs of area of accident with descriptions redacted taken June 13, 2014

- 227. 5 Photographs of area of accident with descriptions redacted taken July 2, 2014
- 228. Photographs of area of accident dated July 17, 2014

SCHEDULE "B"

Documents that are or were in the corporation's possession, control or power that it objects to producing on the grounds of privilege.

- (a) **Lawyer-Client Privilege:** Documents containing confidential professional communications passing between the corporation, or the corporation's agent and the corporation's legal advisers directly related to the seeking or receiving of legal advice or legal assistance.
- (b) **Litigation Privilege:** Documents comprised of notes, memoranda, reports, confidential correspondence, and copies thereof, prepared for the purposes of obtaining or providing advice concerning this litigation, of obtaining or providing information and evidence to be used in this litigation and preparing for and prosecuting this litigation.
- (c) **Without Prejudice Communication Privilege:** Documents containing or reflecting communications of a without prejudice nature concerning the matters in issue in this litigation.

Bannatyne & Company, Independent Adjuster's File

Reports

- 229. Report #1 dated July 16, 2014
- 230. Emails re collision summary dated July 8, 2014 to July 28, 2014
- 231. Report #2 dated September 4, 2014
- 232. Report #3 dated October 29, 2014
- 233. Report #4 dated December 30, 2014
- 234. Report #5 dated March 4, 2015
- 235. Report #6 dated April 22, 2015
- 236. Report #7 dated November 2, 2015
- 237. Report #8 dated April 27, 2016

Photographs

- 238. 20 Photographs of area of accident with descriptions taken June 13, 2014
- 239. 5 Photographs of area of accident with descriptions taken July 2, 2014

SCHEDULE "C"

Documents that were formerly in the corporation's possession, control or power but are no longer in its possession, control or power.

n/a

RCP-E 30B (November 1, 2008)

MARIA LEE
Plaintiff

-and- LUCAS VANDERBURGH et al.
Defendants

Court File No. 15-52870

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT
HAMILTON

AFFIDAVIT OF DOCUMENTS

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Lawyers for the Defendant,
City of Hamilton

RCP-E 4C (July 1, 2007)