ONTARIO COURT OF JUSTICE

B E T W E E N

CHATHAM-KENT CHILDREN'S SERVICES

-and-

A. A. AND T. S.

FACTUM OF T AND S.S.

(Maternal Grandmother to the Subject child C.R.J.A, born March 31, 2012, a Party added for the purpose of the Mother's Motion re Placement of the Child with Kin, and for the purpose of the Society's Motion that T.S. engage in a Parenting Capacity Assessment)

PART 1 – FACTS AND OVERVIEW

THE PARTIES BEFORE THE COURT

1. The child to whom this matter relates is C.A., born March 31, 2012.

2. A.A. is Mother to the child and resides in Chatham-Kent.

3. T. and S.S. are the child's Maternal Grandparents. They reside in the jurisdiction of the Oxford Children's Aid Society. They have custody of their other grandchildren TP and C, who are cousins to the subject child.

4. In the case of the child TP, she was placed with the Maternal Grandparents when she was 12 months old following her apprehension from her mother, and after the Chatham Society provided a positive Kinship Assessment on them. That placement was accomplished via a Motion for TP's placement brought by the Chatham Society at that time.

5. TP is now 8 years old and there are no identified concerns associated with the Maternal Grandparents' care for her.

6. In the case of the child C, age 7, that child was placed in the care of the Maternal Grandparents following trial of the matter before the Honourable Mr. Justice Fuerth as reported in *Chatham-Kent Children's Services* v. *L.A*, 2014 ONCJ 433 (CanLii).

7. That child has shown remarkable progress in the care of the Maternal Grandparents, and no concerns are maintained relative to their care for him.

8. The Maternal Grandparents have cared for the subject child C.A. in the past. He is familiar with their home, shows attachment to them and his cousins, has a room in their large country home, and is familiar with their community.

STATUS OF PROCEEDINGS

9. The Society has brought a Protection Application with regard to C.A. The matter has been outstanding for over one year, and there has still been no finding that the child is in need of protection.

10. C.A. is currently in the care of the Society.

11. Following a family group conference held with the goal of resolving the matter, the Maternal Grandparents received a positive kinship assessment from the Oxford Children's Aid Society in the jurisdiction in which they reside and propose relative to the child's placement. Based on the Chatham Society's representations, the Maternal Grandparents and the Mother prepared for the placement of the child.

THE SOCIETY OBTAINS AN INCREDIBLE REPORT FROM DR. BAKER, PSYCHOLOGIST

12. The Chatham Society then resigned from its position and obtained an opinion from psychologist Dr. B (hereinafter referred to as the "Report").

13. The Report was authored without notice or input from the Respondent Mother, the Maternal Grandparents, or their counsel relative to the child. In the absence of any defence input, it expressed unqualified opinion relative to the importance of the child's foster parents, and the impropriety of considering a placement with the Maternal Grandparents.

14. The Report was not provided pursuant to an Order made under section 54 of the *Child and Family Services Act*, and was not subject to any of the substantive or procedural safeguards required as a minimum as a result of Regulation 25/07.

THE MOTIONS BEFORE THE COURT

15. The Mother brought a Motion for placement of the child with the Maternal Grandparents, seeking to vary an existing Temporary Care Order. She relies upon the Society's initial representations, and the positive Homestudy completed by the Oxford Society.

16. The Chatham Society is opposed the Mother's Motion on the strength of Dr. Baker's report.

17. The Chatham Society in turn has brought a Motion that the Maternal Grandmother (but not the Maternal Grandfather) participate in a Parenting Capacity Assessment with Dr. Jay McGrory.

18. The Mother and the Maternal Grandparents oppose that Motion.

19. The Mother and the Maternal Grandparents make it clear in their materials that they maintain the position that Dr. B's report is fundamentally flawed, should not be relied upon, and should be struck from the record.

PART 2 – ISSUES

20. IT IS RESPECTFULLY SUBMITTED THAT the matter before the Court raises 3 issues:

MATERIAL CHANGE OF CIRCUMSTANCES

I. Have the Mother and Maternal Grandparents shown a material change of circumstances that warrants change to the child's current placement, having regard to the principles of protection, minimal intrusion, and in the child C's best interests as informed by the several statutory pathways of return maintained in the *Child and Family Services Act*? (This is addressed in Part 3 – Law and Application, under the further subheading "Issue 1 – Variation of Temporary Care Order".)

IS AN "EXPERT OPINION" EVIDENCE FOR THE PURPOSE OF S.51

II. Is Dr. B's Report admissible in these proceedings at this stage? Is it "evidence" for the purposes of section 51 of the *Child and Family Services Act*, or is it to be excluded as falling short of the characterization of "evidence" as a result of its failure to satisfy <u>any</u> of the criteria for admissibility of opinions pursuant to the Supreme Court of Canada's direction in *Mohan*? (This is addressed in Part 3 – Law and Application, under the further subheading "Issue 2 – Dr. B's Report and its Admissibility Pursuant to *Mohan*".)

CRITERIA OF NECESSITY PRIOR TO ORDERING AN ASSESSMENT (REG 25/07)

III. Is it necessary for the Maternal Grandmother to participate in a Parenting Capacity Assessment, either while the child is in her Temporary Care, or prior to that placement? (This is addressed in Part 3 – Law and Application under the further subheading "Issue 3 – Parenting Capacity Assessment".)

PART 3 – LAW AND APPLICATION

ISSUE 1 – VARIATION OF TEMPORARY CARE ORDER

21. The Mother and the Maternal Grandparents maintain that the Grandparents' participation in the mentioned Kinship Assessment represents a change in circumstances for the purposes of a variation of the existing Temporary Care Order. They take the position that, having regard to the entire statutory context governing this matter, and in particular having regard to the principles of minimum intrusion, statutory pathway of return, and best interests, the child C.A. should live with the Maternal Grandparents and his two young cousins.

22. Section 51 of the *Act*, and the Appeal Case of *CAS* v. *E.L.* establish that once a material change in circumstances is shown in a protection matter, the Court shall vary the existing Order having regard to the Statutory Pathway of Return set out in section 51.

23. If placement with kin is "possible", it is to be preferred to Foster Care. The role and any comparison of the value of Foster Care in the best interests analysis is not permitted in the *Act*.

24. In the case of variations, the judicial function is to ascertain whether a variation of the status quo makes common sense within the statutory scheme provided by Part III of the Act.

    - ***Children's Aid Society of Algoma* v. *D.M.*, [2013] O.J. No. 3366 (Ont. C.J. per Kukurin J.) at para. 17.**

25. The *Act* provides for a clear statutory pathway of return. It does not permit a comparison of Foster Homes vs. Kinship or Return to Parents. The statutory pathway of return applies at both the interim stage, to motions to vary an interim order, and to disposition where Protection, or Continuing Need for Protection are found.

    - **See *Windsor-Essex Children's Aid Society* v. *L.V. and E.J.* (2013), 13 R.F.L. (7th) 226 (Ont. C.J. per Tobin J.) at paras 63-71.**

26. In the case at bar, the Mother and Maternal Grandparents to the child seek the child's placement with the Grandparents. The Grandparents have a relationship with the child, they have custody of the child's cousins, who likewise share a relationship with the child. They maintain a large home wherein the child already has a room he identifies as his own, and they have in the past cared for the child. They are presenting a permanent plan for the child that preserves the child's family and other community relationships.

27. The Maternal Grandparents have done more in the case at bar in pursuing their desired placement than they did in a previous case involving their grandchild C. In that case, decided at trial by the Honourable Justice Fuerth, the Society failed to have regard to its obligations under section 2 of the *Act*, and to the Statutory Pathway of Return that is of significance in child protection matters.

    - **See Affidavit of T.S., and *Chatham-Kent Children's Services* v. *L.A*, 2014 ONCJ 433 (CanLii) (Ont. C.J. per Fuerth J.).**

28. The Maternal Grandparents' plan is harmonious with the provisions of section 51, and makes "common sense" having regard to the *Act*, and its caselaw, particularly reported caselaw that involved them and the child's cousins, decided just 3 years ago.

29. There are no outstanding criticisms of the Maternal Grandparents' abilities to care for the child in the sworn evidence, outside of that which comes from a report from one Dr. B, a psychologist. Any allegations that could be construed as negative, absent Dr. B's report, are resolved in the Affidavit of T.S., by its exhibits, and by the homestudy completed with positive results by the Oxford Society.

30. The Chatham Society had represented that it intended to place the subject child with the Maternal Grandparents upon provision of a positive homestudy form the Oxford Society. They apparently thought that this would be a promise with an impossible condition precedent.

ISSUE 2 – DR. B'S REPORT AND ITS ADMISSIBILITY PURSUANT TO THE SUPREME COURT OF CANADA'S DECISION IN *MOHAN*

31. The Society largely relies upon Dr. B's report in support of their position in both opposing the child's placement with the Maternal Grandparents, and in seeking a Parenting Capacity Assessment as against only the Maternal Grandmother.

32. In order for the Society to succeed in either regard, it bears the onus of demonstrating that Dr. B's opinion evidence is admissible. They seek to rely upon the relaxed provisions relative to admissibility of evidence that are found in section 51 of the *Act*.

33. The relaxed evidentiary provisions governing section 51 hearings are of no application in the context of a motion brought pursuant to section 54 of the *Act*.

DR. B'S REPORT NOT EVIDENCE FOR THE PURPOSES OF SECTION 51 OF THE ACT

34. IT IS RESPECTFULLY SUBMITTED that it is insufficient to simply proffer opinion evidence to the Court and suggest that it amounts to "credible and trustworthy evidence" simply because it was written and offers opinions as to some party before the Court.

35. The evidentiary latitude granted in section 51 of the Act has not displaced the dicta of the Supreme Court of Canada in *Mohan*. This is the case because:

    a. Section 51 speaks to <u>evidence</u> that is considered credible and trustworthy under the circumstances. Opinions are presumptively not considered to be evidence

    b. In child protection cases the importance of the role of the judge as gate-keeper is heightened as the court deals with "family law-plus" and not "family-law minus" issues that impact upon the most important commodity the province has (children and families)

        - **See *Children's Aid Society of London and Middlesex* v. *C.D.B.*, [2013] O.J. No. 2808 (Ontario S.C.J. per Harper J.) at paras 20-25.**

c. The possibility of confirmation-bias is heightened in Child Protection cases because of the interests at stake, and the human inclination to turn to someone declared an "expert" with less than a critical eye. "Expert opinions loom large" in the eyes of the decision-maker, and the parties

36. Inasmuch as *Mohan* represents the path by which unqualified opinion transitions into qualified opinion evidence, it is necessary to apply *Mohan* before a section 51 analysis as to credibility and trustworthiness is applied.

37. It is only after applying the *Mohan* analysis that the Court turns to section 51's evidentiary permissibility to determine whether the apparent analytical facts underpinning the opinion are grounded in juridical facts found in the affidavit evidence before the Court that are themselves credible and trustworthy under the circumstances.

APPLYING *MOHAN*

38. Applying *Mohan*, Dr. B's report is of no value and should be disregarded with prejudice, if not struck entirely from the record.

39. The Supreme Court of Canada decision in *Mohan* reiterated the importance of the judge's role as gatekeeper, particularly in the context of receipt of opinion evidence.

40. *Mohan* is regularly applied throughout all areas of litigation in Ontario at trial stages. It is likewise applied at the stage of motions, and in Temporary Care Hearings held under the *Act*.

- **See *K.E.F.* v. *T.W.P.*, 2016 BCSC 1706 (CanLii) (B.C.S.C. per Rogers J.); *The Canadian Society of Immigration Consultants* v. *The Minister of Citizenship and Immigration*, 2011 FC 669 (CanLii) (Federal Court per Snider J.); and *Children's Aid Society of Toronto* v. *S.G. and E.P.*, 2012 ONCJ 585 (CanLii) (Ontario Court of Justice per Jones J.).**

41. *Mohan* sets out a 4-part test that must be satisfied prior to considering the admissibility of opinion evidence. If the party that seeks to admit opinion evidence fails any stage of the *Mohan* criteria, the Court is not permitted to enter into the second stage of the *Mohan* analysis which requires the Court to weigh the proffered opinion's probative value as against its prejudicial effect.

    - **Supra *CAS London/Middlesex* v. *C.D.B.* at Pages 13-17, paras 54-56 (which includes "Analysis" and para 11 – 16 of the decision of Campbell J. in *Johnstone* v. *Gordon*, [2004] O.J. No. 3267 (Ont. S.C.J.).)**

42. The initial 4-part test in *Mohan* requires a Court to consider:

    a. Relevance
    b. Necessity
    c. The lack of any other exclusionary rule
    d. A Properly Qualified Expert

AS TO RELEVANCE – DR B'S REPORT IRRELEVANT HAVING REGARD TO THE STATUTORY CONTEXT

43. Dr. B's report is of questionable relevance. It offers comment and opinion relative to the subject child who he met, and that child's relationship, and attachment to the child's current Foster Parents.

44. In the statutory context of Protection Proceedings under the *Child and Family Services Act*, this is entirely irrelevant. The *Act* has several prohibitions that prevent a court from weighing the ability of Foster Families, with their specialized training and support from the CAS, as against the ability of Parents and Kin as part of the Best Interests Analysis. The *Act* purposely limits the role Foster Parents can play in the litigation at the point of a Protection Application (as in the case at bar). It accentuates the primary importance of placement with family in both the Primary and Other Objectives of the Act. It provides a Statutory Pathway of Return that is purposeful and requires the Court to determine whether Return or Placement with Kin is in the child's best interests, having regard to "community standards of tolerance" relative to caregiving of children.

- **See *Windsor-Essex Children's Aid Society* v. *L.V. and E.J.* (2013), 13 R.F.L. (7th) 226 (Ont. C.J. per Tobin J.) at paras 63-71.**

45. This Statutory Pathway of Return is noted in the *Act*'s interim provisions under section 51, its provisions and binding appellate caselaw in the context of Motions to Vary interim Orders, and in its dispositional provisions.

- **See *Children's Aid Society* v. *E.L.*, [2003] O.J. No. 3281 (Ontario S.C.J. on Appeal from the Order of the Ontario Court of Justice, per Himel J.A.) at paras 33-34.**

46. Dr. B's report provides unqualified opinion relative to the child's attachment to Foster Parents, and the potential impact of separation from the Foster Parents upon the child's best interests. In the statutory scheme of the *Act* this opinion is irrelevant. That opinion is based solely on unknown information provided to Dr. Baker by the Society, without notice or input from those affected by his report. It is based on singular and necessarily biased information from the child's Foster Parents who have a vested emotional (but not legal) interest in the report's conclusion. Dr. Baker did not meet with the Mother, the Grandparents, nor their lawyers. He did not read their pleadings, affidavits, nor observe their interaction with the child. He did not apparently canvas the child's views and preferences with regard to living with Kin, nor with his cousins, one of whom was placed with the Grandparents by the Honourable Justice Fuerth following trial. He did not note the strikingly similar opinions, concerns, allegations, evidence and Society oppositionalism to the value of the Grandparents' plans and the function of the statute in that case.

- **See Affidavit of T.S., and *Chatham-Kent Children's Services* v. *L.A*, 2014 ONCJ 433 (CanLii) (Ont. C.J. per Fuerth J.).**

47. As a result, Dr. B's report should not be considered in the Case-at-bar, and should be struck from the record for failing the first stage of the *Mohan* analysis.

48. Dr. B's report is not necessary. Any information relative to the child's development is found elsewhere in the record, and in particular is noted in the report offered by Dr. Freeman.

49. Dr. B's report does not assist the Court in a function that goes beyond the Court's expertise. It may be that if Dr. Baker had been properly informed, from unbiased sources, and the process leading to the production of his report had been open to input from all counsel and the Court in accordance with Regulation 25/07, it could have been *helpful.* That is <u>if it had been qualified and limited to the proper statutory framework and context</u>. But even then it would not have been *necessary*.

THE LACK OF ANY OTHER EXCLUSIONARY RULE

50. Dr. B's report was not apparently based on pleadings or juridical fact that have made their way into the record. It was based largely on other reports, such as those from Dr. Freeman, as well as on unknown input from the Society, and unknown input from the Foster Parents.

51. Dr. Freeman's report itself is hearsay, and contains hearsay that has not yet made its way into the realm of juridical fact. As such, the risk of confirmation bias is magnified to the extent that Dr. Freeman's report is relied upon in Dr. B's report.

52. The Foster Parents have not provided any affidavit evidence. Their statements to Dr. B are entirely untested, and are unknown as to any particulars upon which he relies (because he does not identify them). They themselves are presumptively excluded as hearsay. Dr. B's report is not accompanied by an Affidavit of his own that swears as to what he has apparently been told by the Foster Parents or the Society, nor does he indicate that he "verily believes those statements to be true". As Dr. B is unaware of the statements upon which Dr. Freeman relied in the provision of her report, he cannot identify those sources, nor depose that he "verily believes that their information is true".

53. This shields the sources of any analytical fact from cross-examination, and is presumptively excluded as hearsay.

54. As such, Dr. B's report, in addition to being irrelevant and not necessary, should be excluded as being subject to other exclusionary rules of evidence that are fundamental to the preservation of the *Charter* interests and rules of fundamental fairness at play in Child Protection Cases.

DR. B NOT A QUALIFIED EXPERT FOR THE PURPOSES OF THIS REPORT

55. Dr. B is not a qualified expert to the extent that he would suggest a Court rely upon the opinion offered in his unqualified report.

56. It is respectfully submitted that in order for an Expert to maintain his designation as such for legal purposes, the process he employs in the formation and provision of an opinion must be harmonious with generally accepted standards in the professional and legal community.

57. Where a distinguished professional, though qualified elsewhere and in other circumstances as an "expert" for the purpose of giving opinion evidence, has not followed generally accepted standards, his report has been excluded under this wing of the *Mohan* analysis.

- **See *CAS London/Middlesex* v. *C.D.B.*, at para. 56.**

58. The College of Psychologists of Ontario is the governing body that regulates the provision of psychological services in Ontario. Rule 14 of its Standards of Professional Conduct provides that:

a. Psychologists be familiar with the standardization, norms and reliability of any tests and techniques used

b. That they render only those professional opinions that are based on "current, reliable, adequate, and appropriate information"

c. That they identify limits to the certainty with which opinions or predictions can be made about individuals

d. That they provide professional opinions that are fair and unbiased, and make reasonable efforts to avoid the appearance of bias.

- **The College of Psychologists of Ontario, "Standards of Professional Conduct", Effective September 2, 2005, Revised March 27, 2009, Rule 1 and 14.**

59. Dr. B strayed entirely out of the realm of standard professionalism in the provision of his report, particularly if he intended for it to be relied upon for anything more than a purpose that was subject to a litigation privilege. Where the Society seeks to rely upon it for Court purposes, the process of its creation strays so far from commonly accepted standards in the professional community that Dr. B himself can no longer be considered a qualified expert. If Dr. B is to maintain the legal designation of a "qualified expert", he must not divorce himself from a process that fails to reflect those qualifications.

60. Dr. B did not, in the creation of this report, show familiarity with norms and reliability of testing that otherwise would call for input from the Mother, the Grandparents, corollary sources including, most importantly, those containing juridical facts for him to rely upon, and observations of child/potential caregiver and "sibling" interaction.

61. Dr. B did not offer only an opinion that is based on "current, reliable, adequate or appropriate information". He neither requested nor received any information from the Grandparents, the Mother, Defence Counsel, or the Court.

62. Notwithstanding these astounding limitations to receipt of balanced information, Dr. B did not identify any limits or qualifications of his opinion or prediction. It stands biased and manifests, with all due respect, a certain arrogance in presuming correctness in the absence of basic, commonly expected information.

63. Dr. B's report, and himself in this matter, simply cannot be viewed as anything less than biased and unfair.

64. As such, the report also fails the 4th *Mohan* criteria, and should be struck.

REPORT'S PROBATIVE VALUE IS OUTWEIGHED BY ITS PREJUDICIAL EFFECT

65. Dr. B's report works significant prejudicial effect, but offers little probative assistance.

66. It relies upon unsworn hearsay that is not found in any sworn documents in the Continuing Record.

67. It relies upon a separate report from Dr. Freeman that also relies upon hearsay, and fails to specify all sources or statements, shielding the makers of any statement relied upon analytically from any cross-examination for the purpose of "marrying up" any juridical facts to the opinion offered.

68. It "looms large" in the face of the Court's duty as gatekeeper as an attractive, clear, unqualified opinion that, if relied upon "makes things easy" because of the air of expertise accompanying the report.

69. It was produced without regard to the slightest elements of fairness, slanders the Grandparents' knowledge, abilities, and insight without even so much as making a phonecall to them to determine if what Dr. B "heard about them" was accurate.

70. It fails to have any regard to the statutory context of this matter.

71. It works an impossible prejudice upon the Grandparents, and cannot offer any reliable assistance to the Court that is dealing with subject matter of the greatest importance in the province.

72. When dealing with children and families, the best evidence is required, and that much more so than in any multi-million dollar contractual dispute. Dr. B's report falls short of acknowledging, procedurally or substantively, that reality.

73. As a result, it is respectfully submitted that Dr. B's report should be struck from the record, and not relied upon whatsoever in the course of these proceedings.

74. The impact of this is that there is no credible and trustworthy evidence associated with risk, or the child's best interests, having regard to the principle of minimal intrusion, that would preclude the child's placement with the Maternal Grandparents.

ISSUE 3 – PARENTAL CAPACITY ASSESSMENT

75. Having addressed the issue of the variation sought, together with the inadmissibility of Dr. B's report, IT IS RESPECTFULLY SUBMITTED that the only remaining issue before the Court deals with the Society's request that the Maternal Grandmother submit herself to a Parenting Capacity Assessment.

76. The ordering of Parenting Capacity Assessments is governed by section 54 of the *Act*, as well as Regulation 25/07. It is a matter of judicial discretion to be employed after a determination that an Assessment is "necessary", as opposed to helpful.

- **See Regulation 25/07, section 2(a) and (b), and *Children's Aid Society of Algoma* v. *P.Mc.*, [2008] O.J. No. 5774 (Ont. C.J. per Kukurin J.) at para 7-14.**

77. IT IS RESPECTFULLY SUBMITTED that any suggestion that Parenting Capacity Assessments may be ordered in a Court's discretion where it is deemed "helpful" is in error. The Ontario Court of Justice is a Statutory Court with jurisdiction that is limited to that granted by the Statute. The Statute and its Regulations call for the test of "necessity", and not "helpfulness".

78. Furthermore, as is addressed elsewhere relative to the admissibility of expert opinions, the Supreme Court of Canada has declared that the test of "necessity" is to be applied, and not the test of "helpfulness".

- ***CAS London/Middlesex* v. *C.D.B.* at Pages 13-17, paras 54-56 (which includes "Analysis" and para 11 – 16 of the decision of Campbell J. in *Johnstone* v. *Gordon*, [2004] O.J. No. 3267 (Ont. S.C.J.), all citing *Mohan* at the Supreme Court of Canada.)**

79. In the case at bar there is no evidence of clinical issue appertaining to the Maternal Grandmother's parenting capacity. The Society does seek to rely upon the input of Dr. B to support its proposition that the Maternal Grandmother should submit to a Parenting Capacity Assessment, but that report, for the reasons set out herein, is neither evidence, nor is reliable. It is inflammatory, uninformed, and unqualified.

80. The Grandparents have already had 2 children placed with them, one of whom likewise had significant needs. That child made significant and unexpected progress in the Grandparents' care because of their diligence and attention.

81. The Grandparents have manifest an ability to work with service providers, and to actively seek out, learn and internalize important direction appertaining to children in their care.

82. The Grandparents have already cared for the subject child, he has a relationship that is undisputed in juridical fact with them and the two other children currently in their care.

83. There is no indication of inability to parent, nor of clinical issue associated with the Grandparents that could affect their capacity to parent the subject child. They participated freely in a homestudy with the Oxford Society and received a positive recommendation. That recommendation is bolstered by the evidence associated with their care of the child Christopher, and the child Topanga.

84. It is respectfully submitted that the evidence would suggest that the Society's request for a Parenting Capacity Assessment (when one was not sought months ago when they relied only upon a Kinship Assessment), represents a fishing expedition and will result in significant delay, particularly if any assessor seeks to rely upon any information provided by Dr. B.

85. A Parenting Capacity Assessment, simply put, is not necessary.

86. As a result, and for the reasons further set out in the Factum provided by the Respondent Mother, the Maternal Grandparents take the position that the Society's motion for the Maternal Grandmother to be subjected to a Parenting Capacity Assessment should be dismissed.

PART 4 – CONCLUSION AND ORDER SOUGHT

87. As a result of the foregoing, the Maternal Grandparents seek an Order striking the Report of Dr. B from the Continuing Record, an Order dismissing the Society's motion that the Maternal Grandmother participate in a Parenting Capacity Assessment, and an Order placing the subject child with them subject to interim terms of supervision, together with their costs, fixed and payable within 30 days.

ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS 6TH DAY OF AUGUST, 2017.

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Solicitor for the Grandparents