

ONTARIO COURT (GENERAL DIVISION)

BETWEEN:

CATHERINE L.E. ROSS

Petitioner
(Wife)

- and -

WILLIAM THOMAS ROSS

Respondent
(Husband)

AFFIDAVIT

I, MARGUERITE DAY, of the City of Ottawa, in the Regional Municipality of Ottawa-Carleton and Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

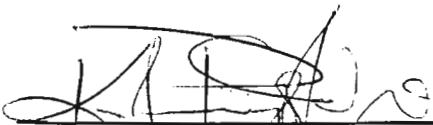
1. I am the mother of the Petitioner, Catherine Ross, and as such have personal knowledge of the matters and facts hereinafter deposed to by me.
2. I have maintained a close relationship with my daughter, Catherine, her husband, Bill, and their two children. I see the children frequently, with one or both of their parents, and on their own very frequently. Other than their parents, I probably see Khierstyn and Hilary more than any other individual.
3. I make this Affidavit for the purpose of setting out my observations with respect to the relationship between by daughter, Catherine, and her husband, the parenting practices and skills of each, and the capabilities of each to be the primary or custodial parent of their two children.

- (b) Her management of every aspect of the children's lives is organized, efficient, and dependable. She is knowledgeable and has always taken primary responsibility regarding all matters pertaining to their dietary and general health routines, their clothing needs, and to their social interaction;
 - (c) In disciplining the children, Catherine's focus is on reward rather than punishment;
 - (d) She enrolls the children in classes and other activities to develop personal and social skills and she facilitates their attendance and performance at these activities;
 - (e) She teaches cooperation rather than competition, emphasizing negotiation rather than force in settling their disputes; and
 - (f) She has earned the children's trust as well as their respect, and the love, trust and mutual respect between them is obvious.
9. I strongly believe that Bill should not be the principal custodial parent for Khierstyn and Hilary, for the following reasons:
- (a) He regards his children (and his wife) as possessions, which is not healthy to their development and well being;
 - (b) He is inept at real communication because he does not listen to other's opinions or explanations, regarding his opinions as fact, and all other opinions as mistakes in the other person's judgment;

- (c) He believes in strict unquestioning obedience and that discipline must always mean punishment;
 - (d) The punishments which he imposes upon the children are often severe and non-negotiable. Furthermore, they are erratic, imposed without forethought, with the result that the children never know what to expect from him;
 - (e) He teaches the children to mistrust everyone, including each other, even questioning whether they might be cheating at simple games;
 - (f) He teaches the children to be overly competitive with each other as well as with other people;
 - (g) He does not understand cooperation;
 - (h) He treats his children as though they must be controlled;
and
 - (i) He lacks the organizational skills, consistency, dedication and focus to manage a family on a day to day or long term basis.
10. I strongly believe that it would be in the children's best interests to maintain as much contact as possible with their father. I further believe that it would be detrimental to the children if Catherine and Bill were not able to work together for the benefit of their children. For the foreseeable future, however, I believe the children's needs can best be served by an arrangement whereby they live with their mother and spend specified periods of time with their father.

11. This Affidavit is made bona fide and for no improper purpose.

SWORN BEFORE ME at the City of Ottawa)
in the Regional Municipality of)
Ottawa-Carleton on the 17th day of)
June, 1994.)



A Commissioner for taking
affidavits, etc.



MARGUERITE DAY

CATHERINE L. E. ROSS
Petitioner

- and -

WILLIAM THOMAS ROSS
Respondent

COURT FILE NO.

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ONTARIO COURT (GENERAL DIVISION)

Proceeding commenced at Ottawa

AFFIDAVIT

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