

This is Exhibit "K"  
of the Affidavit  
of Catherine Ross  
sworn May 20, 1998  
A Commissioner, etc.

A handwritten signature in black ink, appearing to be "KAT" followed by a large, stylized flourish or initial.

ONTARIO COURT (GENERAL DIVISION)

BETWEEN:

CATHERINE L.E. ROSS

Petitioner  
(Wife)

- and -

WILLIAM THOMAS ROSS

Respondent  
(Husband)

AFFIDAVIT

I, KATHY SAINTHILL, 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 a friend of the Applicant, and as such have knowledge of the matters and facts hereinafter deposed to by me.

2. I have known Catherine Ross since 1976, when we worked together at MacDonald's. Although there have been a few brief periods of time where we have not maintained constant since 1976, we have essentially been good friends since then. We frequently visit, more often these days on the telephone. I also attended frequently at the home of Catherine and Bill Ross. Accordingly, over the years, I have had many opportunities to see Catherine and Bill interact, and to see each of them interact with their children, Khierstyn and Hilary.

3. Catherine is an excellent mother, who is very focused with her children. She takes time with the children to read to them and to play educational games with them. She thrives in her role as "teacher". In the presence of myself and Kathy, the children were typically very well behaved, though Khierstyn would act out from time to time. However, Catherine was always able to deal with any

such behavioural problems. I can clearly recall one incident in which Khierstyn was misbehaving. Catherine sat down to talk to Khierstyn to discuss the problem, then sat Khierstyn down at the table alone, as a kind of "time out".

4. This contrasted greatly with the methods employed by Bill in disciplining the children. I can vividly recall an incident in which Bill punished Khierstyn by removing all of her toys and personal possessions from her room, saying she could have them back when she learned to look after her things. Although I can't specifically recall what it was that Khierstyn had done, I believe she had ripped a page in one of her books. I can however, remember being horrified at the severity of the punishment, given the nature of the misbehaviour.

5. Catherine is a very forthright, open, individual. Bill Ross, on the other hand, tends to be very controlling and manipulative. For example, this past spring, Bill telephone me, and informed me that Catherine needed a friend, as she was having a tough time and drinking a lot. I have known Bill since 1985, and the tone of his voice suggested to me that he was trying to make me believe that Catherine was having trouble in an attempt to hurt her, rather than trying to help her. Bill called several more times in the ensuing months to tell me that Catherine was drinking and that she needed my help. I was extremely offended by his attempts to manipulate the situation, as my conversations with Catherine clearly suggested otherwise. I advised her that she should get a lawyer.

6. My experience with Bill has also led me to believe he is an extremely controlling individual. I can recall one incident in particular, in which Bill challenged Catherine's opinion on a relatively insignificant matter, with the following: "I'm a man ... I'm an engineer ... I've been around the world ... What have you done?" With that, he dismissed her. On another occasion, in their home, Catherine very nicely asked Bill to take his turn changing diapers. Bill's response was: "Don't try to stuff that

off on me ... don't think you can get away with that in front of your friends".

7. Lastly, I am shocked by the suggestion that Catherine is or was addicted to alcohol. Catherine has always enjoyed a social drink, and on occasion would have a few drinks with dinner in my presence. To the best of my knowledge, however, any drinking has never interfered with her ability to look after her own and her children's affairs, and I would find that suggesting shocking. I strongly believe that Bill has picked up on drinking as being an 'easy mark' to discredit Catherine, given his attempts this spring to convince me that Catherine was drinking excessively on a daily basis, when I knew from my discussions that she was not. When I spoke with her on the telephone, her speech was never impaired. Had she been drinking the quantities of alcohol suggested by Bill on the daily basis suggested by Bill, she should have been incoherent.

8. Lastly, Catherine advised has now advised me that an assessment report has been prepared in which Bill is recommended to have custody of Khierstyn and Hilary. This to me is incomprehensible. Although I have not reviewed the report, I am so shocked by this suggestion that I wonder what misinformation was provided in the assessment process.

9. 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 18th day of November, 1994.  
November, 1994.

A Commissioner for taking  
affidavits, etc.

  
KATHY SAINTHILL

CATHERINE L. E. ROSS  
Petitioner

- and -

WILLIAM THOMAS ROSS  
Respondent

**ONTARIO COURT (GENERAL DIVISION)**

Proceeding commenced at Ottawa

**AFFIDAVIT OF KATHY SAINTHILL**

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