

ONTARIO COURT (GENERAL DIVISION)

BETWEEN:

CATHERINE L.E. ROSS

Petitioner
(Wife)

- and -

WILLIAM THOMAS ROSS

Respondent
(Husband)

AFFIDAVIT

I, CAROL TAYLOR-KARDAS, of the City of Gloucester, in the Regional Municipality of Ottawa-Carleton and Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

1. I am a friend of the Petitioner, Catherine Ross. I have known her since 1980, and since then have had numerous opportunities to meet with her and her children. Accordingly, I have knowledge of the matters and facts hereinafter deposed to by me.

2. Initially, Catherine and I worked together, for the Federal Government in the Student Aid Program. We have maintained our friendship since then, and see each other frequently. We also speak very regularly on the telephone. I have been invited to the home of Catherine and Bill Ross on numerous occasions for social events. In addition I frequently visited Catherine at home during the day, when she was at home with her children.

3. I am making this Affidavit for two reasons. Firstly, I was shocked by the suggestion that Catherine was addicted to alcohol, and thereafter prescription drugs. Second, I am shocked to hear a recommendation has been made by an independent assessor that Catherine not be granted custody of her children.

4. With respect to the first matter, I have never seen Catherine drunk. I have frequently seen her drink alcohol at appropriate occasions. For example, at social events, we would frequently have alcohol with dinner. When we visited Catherine and Bill Ross in their home, alcohol was frequently served with dinner, and we often had a social drink in the evening, after the children were sent to bed. However, this was an activity that all participated in, including not only myself and Catherine, but also Bill Ross.

5. I am also aware that Catherine began drinking more frequently in the months preceding her separation from Mr. Ross. Catherine discussed this with me on numerous occasions, and it became clear to me that Catherine was drinking frequently, though not to excess on each occasion, in an attempt to avoid her marital difficulties. In the Spring of 1994, Catherine openly discussed with me her concern about the fact that she was drinking frequently, and her desire to stop doing so. From every indication that I have, she at that point in time, stopped drinking.

6. I find the suggestion that Catherine Ross simply switched from drinking alcohol, to taking prescription drugs, changing from one addiction to another, to be ridiculous. Catherine has been under an incredible amount of stress over the past several months. Not only has she had to deal with her separation from her husband, and a custody battle, she has had to deal with numerous aggravating factors.

7. Over the last couple of months, I have received numerous telephone calls from Catherine, in which she has been upset by things done to her by Mr. Ross. She has described numerous incidents in which her husband has removed personal effects from her home, including items with sentimental value. She has described coming home in the evenings, after her husband has been in the home with the children where her home has been left in a state of disaster. She describes having to come home at 9:00 at night, to find the whole house in disrepair, leaving her to get it

back in order before she goes to bed. She has described incidents in which members of her husband's family have appeared at her home, unannounced, when she is in the home with the children. She has described incidents in which her husband has failed to pick up the children, when he is supposed to. She has described incidents when she has had to track down the children through other people, due to her husband's failure to inform her when he will not return the children as scheduled. She has described various threats made to her by her husband, in the course of these proceedings. She has described her situation to me as being very uncertain, and being in a state of constant seige, not knowing what to expect next from her husband. Accordingly, it is not in the least bit surprising to me, that Catherine has been required to seek treatment for the stress which she feels, and as part of that treatment, to take tranquilizers.

8. With respect to Catherine's care/of her children, I strongly believe she is an excellent mother. I have three children of my own, and accordingly, Catherine and I frequently discuss parenting issues. Catherine is a loving, caring, and patient mother. She gives her children lots of attention, and frequently participates in teaching activities with them. I have seen her sit with the children at the table, reading to them, and playing educational games with them. I believe she is a strong role model for her children, who clearly dote upon her.

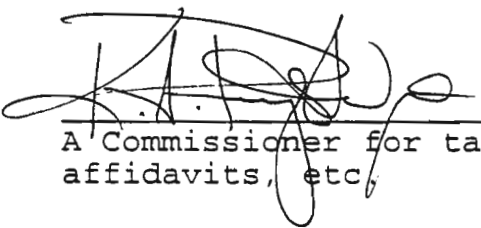
9. I have also had opportunities to see Bill Ross interact with his children. He is relatively good with the children, and I have seen him play games with the children on numerous occasions. However, it has always been my opinion, based on my observations of Bill and Catherine, that Bill spends his time doing the "fun" activities with the children, leaving Catherine to attend to making arrangements for the childrens care, education, medical and dental appointments, and other such matters.

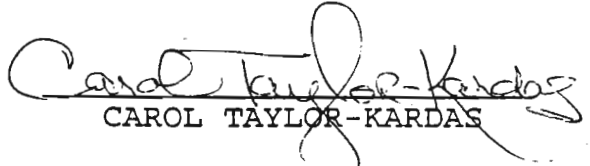
10. It is to me incomprehensible that the suggestion could be made

that Catherine is not able to discipline her children. She has always been effective in this regard, when I have been present with her and the children.

11. I make this Affidavit bona fide in support of Catherine's request for custody of her children, and for no other or improper purpose.

SWORN BEFORE ME at the
City of Ottawa in the
Regional Municipality of
Ottawa-Carleton on
the 21st day of November, 1994.


A Commissioner for taking
affidavits, etc.


CAROL TAYLOR-KARDAS

CATHERINE L. E. ROSS
Petitioner

- and -

WILLIAM THOMAS ROSS
Respondent

ONTARIO COURT (GENERAL DIVISION)

Proceeding commenced at Ottawa

AFFIDAVIT OF CAROL TAYLOR-KARDAS

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