

CANADA

(Class Action)

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL
No.: 500-06-000743-159

SUPERIOR COURT

BENEDICT MATTHEW BISSONETTE, residing
and domiciled at 2508 Gardner Place, Los Angeles,
California, 91206

Petitioner

- v. -

CITY OF WESTMOUNT domiciled at 4333
Sherbrooke Street West, in the City of Montreal,
Province of Quebec, H3Z 1E2

Respondent

**MOTION FOR AUTHORIZATION TO INSTITUTE A CLASS ACTION
AND OBTAIN THE STATUS OF A REPRESENTATIVE
(C.C.P. Articles 1002 et seq.)**

**TO ONE OF THE HONOURABLE JUDGES OF THE SUPERIOR COURT OF QUEBEC IN
THE DISTRICT OF MONTREAL, THE PETITIONER ALLEGES THE FOLLOWING:**

The City of Westmount turned a blind eye to the disturbing and illegal behaviour of their long-time employee, John Garland, while he acted as Superintendent of the Westmount Parks and Recreation Department from 1953 to 1987. This negligence resulted in the repeated sexual assault of many children who came into contact with Garland while participating in the sports programs offered by the City of Westmount. This proceeding seeks compensation for all those who suffered due to the trauma they experienced at the hands of John Garland.

1. The Petitioner seeks the authorization of a class action, on his own behalf and on behalf of the members forming part of the Class hereinafter described:

All persons who, from 1953 to 1987, were sexually or emotionally abused by John Garland while participating in the sports and recreation programs offered by the City of Westmount;

Toutes les personnes qui, entre 1953 et 1987, ont été abusées sexuellement ou émotionnellement par John Garland alors qu'elles participaient aux programmes de sports et loisirs offerts par la Ville de Westmount;

DOITIS LE GREFFE
Gouvernement du Québec
Palais Justice MONTREAL

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2015-06-05

2. The facts that give rise to an individual action on behalf of the Petitioner and the class members against the Respondent, are as follows:

THE RESPONDENT

- 2.1 The City of Westmount (“**Westmount**”) is an affluent neighbourhood, located on the island of Montreal, with a population of roughly 20,000 people;
- 2.2 Westmount is home to schools, parks, a library, an arena and swimming pool;
- 2.3 Westmount also has a recreation centre which offers a variety of activities to its residents throughout the year, including an extensive hockey program;
- 2.4 At the time of the alleged faults, the Department of Parks and Recreation (the “**Department**”) supervised 40 hockey teams on which 600 children played, as appears from a copy of an article from the Westmount Independent, filed as Exhibit P-1;
- 2.5 John Garland (“**Garland**”) was the Superintendent of the Department from 1953 until his retirement in 1987;

THE RESPONDENT’S FAULTS

- 2.6 At all times relevant to the present action, the Respondent was aware or should have been aware of the faults committed by its employee John Garland in the performance of his duties as Superintendent of the Department;
- 2.7 Garland was a familiar face around Westmount. The Department’s hockey program was often referred to as “Johnny’s League”;
- 2.8 During his tenure, Garland consistently took a special interest in one or two boys each year who participated in the Department’s programs;
- 2.9 Department participants and employees referred to these boys as “Johnny’s Pets”;
- 2.10 Garland would regularly allow these boys special access to the arena, including his personal locker located in the Department’s office – an area otherwise off limits to the public;
- 2.11 Garland would also invite these boys to his apartment, formerly located in Westmount, at 4777 Sherbrooke Street West, in between Grosvenor and Roslyn avenues, where he lived alone;
- 2.12 These visits to Garland’s apartment were common knowledge among Department participants and employees, as was the special and unusual treatment accorded to “Johnny’s Pets”;
- 2.13 Garland often gave his “Pets” a ride home from the arena in his car;

- 2.14 Department employees could easily witness boys getting into Garland's car since their office windows faced directly out on the arena's parking lot;
- 2.15 By keeping Garland in a position of authority, the City permitted him to regularly and consistently maintain unusual and inappropriately close relationships with the boys he supervised;
- 2.16 By allowing Garland to coach Westmount's Pee Wee All Star hockey team for 34 years, the Respondent made it possible for Garland to commit intentional acts of abuse on the children he came into contact with;
- 2.17 The Petitioner estimates that approximately 50 boys were victims of Garland's abuse;
- 2.18 Many of these children would later develop serious psychological problems including but not limited to depression and drug or alcohol abuse;
- 2.19 The Respondent failed to prevent Garland from assaulting the participants in its programs;
- 2.20 The Respondent is therefore liable to reparation for the injuries caused by the faults of its employee in the performance of his duties;

THE PETITIONER

- 2.21 In 1971, following the divorce of his parents, the Petitioner moved with his mother and brother to 453 Grosvenor Avenue in the City of Westmount;
- 2.22 The Petitioner's father moved to California and was no longer present in the Petitioner's life;
- 2.23 In 1973, at age 8, the Petitioner began playing Novice hockey in the Westmount Parks and Recreation league;
- 2.24 In 1977, at age 12, the Petitioner began playing in the Department's Pee Wee All Star hockey team, which was coached by Garland;
- 2.25 At this time, Garland took an interest in the Petitioner and soon began inviting him to his apartment;
- 2.26 Soda, junk food, pool, darts, and video games were readily available in Garland's apartment;
- 2.27 Garland repeatedly drove the Petitioner home from the Westmount hockey arena in his car;
- 2.28 Garland also encouraged the Petitioner to store his hockey equipment in Garland's locker, located in the Department office, inside the arena;

- 2.29 In the Spring of 1978, Garland began making sexual advances toward the Petitioner who was 12 at the time;
- 2.30 While at Garland's apartment, Garland asked the Petitioner to sit on his lap in a reclining chair, where he would hug the Petitioner while rocking back and forth;
- 2.31 Garland soon began a series of massages during which the Petitioner was encouraged to stretch out on the couch while Garland massaged his feet and legs;
- 2.32 By the Fall of 1978, the massages came to include Garland touching the Petitioner's genitals, as well as masturbating the Petitioner;
- 2.33 During the abuse, the Petitioner would watch television or read adult comics, which Garland provided;
- 2.34 This sexual abuse caused the Petitioner an immense harm;
- 2.35 During the period of abuse, Garland would take the Petitioner go-karting, to hit golf balls/mini-put or out to eat meals at restaurants;
- 2.36 During the period of abuse, Garland also purchased sporting equipment for the Petitioner including a set of shin pads, a pair of hockey gauntlets, hockey sticks, hockey tape, and a baseball glove;
- 2.37 During the period of abuse, Garland hid a key near the entrance to the basement of his apartment building, so the Petitioner could have access to his apartment;
- 2.38 The abuse occurred weekly from the Spring of 1978 until the Fall of 1980, when the Petitioner was aged 12 to 14;
- 2.39 Aside from the abuse, Garland also engaged in emotional manipulation:
 - 2.39.1 Garland would tell the Petitioner that he loved him, that he meant the world to him, as well as other comments to that effect;
 - 2.39.2 If the Petitioner chose to play with friends rather than spend time with Garland, he would be accused of being selfish and opportunistic;
 - 2.39.3 Garland referred to these sessions as "warm ups", implying that it would help the Petitioner prepare for hockey games;
- 2.40 This type of emotional manipulation caused the Petitioner severe distress;
- 2.41 In the Spring of 1980, the Petitioner began to resist Garland's advances and emotional manipulation, and by the Fall of 1980 had stopped visiting Garland's apartment altogether;

- 2.42 In the Fall of 1980, the Petitioner began playing hockey in a different part of Montreal and his contact with Garland ended;
- 2.43 The Petitioner is still not able to fully understand the implications of what Garland did to him and the damages that were caused by Garland's actions;
- 2.44 The Petitioner suffered direct and severe injuries due to the Respondent's failure to protect him from Garland's advances;
- 2.45 The Petitioner is entitled to hold the Respondent responsible for these damages caused by the faults their employee committed;
- 2.46 The Petitioner evaluates the amount of non-pecuniary damages to which he is entitled, namely the psychological and moral damages caused by his relationship with Garland to be \$100 000;
- 2.47 Since the City of Westmount knew about the abuse and did nothing to end the behaviour of its employee, the Petitioner is also entitled to punitive damages in the amount of \$25 000 pursuant to s. 49 of the *Quebec Charter of human rights and freedoms* for the unlawful and intentional interference with his Charter rights;

THE 1993 COMPLAINT

- 2.48 In the spring of 1993, while a law student at Queen's University, the Petitioner filed a criminal complaint against Garland at Westmount's MUC Police Station¹²;
- 2.49 The officer handling the complaint ("**The Officer**") advised the Petitioner to draft a statement of facts regarding the abuse ("**The 1993 Complaint**");
- 2.50 The Petitioner drafted a statement of facts, similar to the one outlined above, which included a statement that Garland's inappropriate behaviour was common knowledge among Department participants and employees;
- 2.51 The Officer informed the Petitioner that he had been in contact with a reporter from the Westmount Examiner, who confirmed that Garland's inappropriate behaviour was common knowledge among Department participants and employees;
- 2.52 The Petitioner and the Officer then attended a meeting with a Crown prosecutor at the Montreal courthouse, and it was decided that the case against Garland would be pursued;
- 2.53 However, in the fall of 1993, the Officer left a message with the Petitioner's college roommate, informing him that there was not enough evidence to lay charges against Garland and the case against him would be dropped;
- 2.54 Upon receiving this message, the Petitioner telephoned the Officer and requested an explanation;

- 2.55 The Officer informed the Petitioner that Westmount Police officers had questioned Garland, who had maintained his innocence and that Garland would sue the Petitioner for defamation if he pursued the matter;
- 2.56 The Officer explained that Westmount Police officers knew Garland and did not believe that the abuse had occurred;
- 2.57 The Officer explained that as the Petitioner was the sole complainant, he lacked credibility;
- 2.58 The Officer stated that the Petitioner, as a first year law student, was knowledgeable of civil litigation and was fabricating the abuse in the hope of financial gain;
- 2.59 This conversation with the Officer led the Petitioner to understand that Westmount Police were not interested in pursuing the 1993 Complaint, and, in fact, disapproved of it altogether;
- 2.60 The Petitioner then contacted the Crown prosecutor, who informed him that because the Westmount Police were reluctant to investigate the matter, there was nothing that the Crown prosecutor could do - the case was closed;
- 2.61 At the time of the 1993 Complaint, the Petitioner had not sought therapy or professional help regarding the abuse. The Westmount Police were the only professional entity contacted by the Petitioner and they failed in their duty to investigate the complaint and protect others. The police turned their back on the Petitioner at the moment when he needed them most;
- 2.62 The Police allowed their personal relationship with Garland and his standing in the community to improperly influence their actions;
- 2.63 Their failure to adequately investigate the complaint against Garland destroyed the Petitioner's emotional capacity to address the matter any further;
- 2.64 Almost ten years would pass before the Petitioner eventually sought treatment and began therapy in 2002. The Petitioner continues treatment to this day. After thirteen years of therapy, the Petitioner was finally able to face his drug and alcohol problem, and begin to control it. The Petitioner no longer abuses drugs or alcohol, and has been sober since March 2014;
- 2.65 It was only through his therapy that the Petitioner came to understand that the decision taken by the Westmount Police and the Crown prosecutor regarding the 1993 Complaint was unacceptable, as was the situation regarding the Department's inaction with regards to Garland's behaviour;
- 2.66 In April of 2012, following the well-publicized conviction of the hockey coach Graham James for sexual abuse against former NHL player Theoren Fleury, the Petitioner contacted the Westmount Police and enquired if there had been any further complaints against Garland with respect to the above-described events;

- 2.67 The Petitioner was informed that the Police had no record of Garland, of the Petitioner, or of the 1993 Complaint;
- 2.68 Upon hearing this, the Petitioner contacted a Montreal criminal lawyer and she agreed to assist the Petitioner to attempt once again to bring the matter of the abuse to the attention of the authorities;
- 2.69 Two months later, on June 12, 2012, John Garland died, precluding any possible criminal prosecution against him for the abuse;
- 2.70 It was only following the death of his perpetrator and the capacity the Petitioner obtained after years of therapy, that he was finally able to take action on his own behalf and on behalf of the class members;
- 3. The facts giving rise to an individual action on behalf of each class member against the Respondent are, other than the facts set out in paragraph 2 with the necessary adaptations, the following:**
- 3.1 Each class member was a participant in the Department's programs while Garland was an employee there;
- 3.2 Each class member had an encounter and a relationship with Garland;
- 3.3 Each class member was sexually and/or mentally abused by Garland;
- 3.4 Each class member suffered psychological and moral damages as a result of their encounter and/relationship with Garland;
- 4. The composition of the class renders the application of articles 59 or 67 C.C.P. difficult or impracticable in that:**
- 4.1 During the time period covered by the present action, approximately 600 children were enrolled in the Department's programs each year;
- 4.2 It is impossible to know the identity of all the persons who participated in the Department's programs between 1953 and 1987;
- 4.3 It is impossible to know the identity of all the persons who were victims of Garland's actions;
- 4.4 With respect to the previous paragraphs, the composition of the class renders the application of articles 59 or 67 C.C.P. difficult or impracticable;
- 5. The Petitioner seeks the following questions of fact or law, which are identical, similar or related and unite each class member, decided by a class action:**
- 5.1 Did the Respondent commit faults in omitting to prevent the actions of their employee Garland and the damages that resulted from his actions?

5.2 Is the Respondent liable for the faults of its employee carried out in the performance of his duties?

5.3 What are the nature and the amount of the damages that the class members can claim from the Respondent?

6. The questions of fact and of law particular to each class member consist of:

6.1 What is the severity of the damages suffered?

6.2 What amount must the Respondent pay in compensatory damages to each class member?

7. It is appropriate to authorize a class action on behalf of the class members for the following reasons:

7.1 Only the institution of a class action will provide the class members with reasonable access to justice;

7.2 The cost of bringing each individual action would disproportionately exceed the amount sought by each member against the Respondent;

8. The nature of the action the Petitioner intends to bring on behalf of the class members is:

8.1 An action in compensatory and punitive damages;

9. The conclusions the Petitioner seeks are the following:

ORDER the Respondent to pay to the Petitioner the amount of one hundred thousand dollars (\$100 000) in damages, for the psychological and moral injuries incurred;

ORDER the Respondent to pay to the Petitioner the amount of one hundred thousand dollars (\$25 000), in punitive damages;

ORDER the Respondent to pay to each class member an amount to be determined as compensation for the psychological and moral injuries incurred;

ORDER the collective recovery of all the punitive damages to be paid to members of the Class, in the amount of \$25 000 per member;

ORDER the collective recovery of member claims for the non-pecuniary damages;

ORDER the Respondents to pay each member of the Class their respective claims, plus interest at the legal rate as well as the additional indemnity provided for by law in virtue of article 1619 C.C.Q.;

THE WHOLE with costs at all levels, including the cost of all exhibits, experts, expert reports and notices;

10. The Petitioner is in a position to adequately represent the class members adequately and this for the following reasons:

- 10.1 The Petitioner is a class member;
- 10.2 The Petitioner has the time, energy, will and determination to assume all responsibilities incumbent upon him in order to diligently carry out the action;
- 10.3 The Petitioner is committed to collaborating fully with his attorneys;
- 10.4 The Petitioner has provided his attorneys with information useful to the present class action;
- 10.5 The Petitioner acts in good faith with the only goal of obtaining justice and compensation for himself and each class member;
- 10.6 The Petitioner is represented by an experienced law firm that specializes in class actions;

11. The Petitioner proposes that the class action be carried out before the Superior Court of the district of Montreal for the following reasons:

- 11.1 The Respondent is domiciled in the district of Montreal;
- 11.2 Attorneys for the Petitioner have their offices in the district of Montreal;
- 11.3 An important part of the class members reside in the district of Montreal and its surroundings;

FOR THESE REASONS, MAY IT PLEASE THE COURT:

GRANT the Petitioner's motion;

AUTHORIZE the class action hereinafter described as:

"All persons, who, from 1953 to 1987, were sexually or emotionally abused by John Garland while participating in the sports and recreation programs offered by the City of Westmount;"

IDENTIFY the principal questions of fact and law to be determined collectively as follows:

Did the Respondent commit faults in omitting to prevent the actions of their employee Garland and the damages that resulted from his actions?

Is the Respondent liable for the fault of its employee carried out in the performance of his duties?

What are the nature and the amount of the damages that the class members can claim from the Respondent?

IDENTIFY as follows the conclusions sought in relation thereof:

ORDER the Respondent to pay to the Petitioner the amount of one hundred thousand dollars (\$100 000) in damages, for the psychological and moral injuries incurred;

ORDER the Respondent to pay to the Petitioner the amount of one hundred thousand dollars (\$25 000), in punitive damages;

ORDER the Respondent to pay to each class member an amount to be determined as compensation for the psychological and moral injuries incurred;

ORDER the collective recovery of all the punitive damages to be paid to members of the Class, in the amount of \$25 000 per member;

ORDER the collective recovery of member claims for the non-pecuniary damages;

ORDER the Respondents to pay each member of the Class their respective claims, plus interest at the legal rate as well as the additional indemnity provided for by law in virtue of article 1619 C.C.Q.;

THE WHOLE with costs at all levels, including the cost of all exhibits, experts, expert reports and notices;

DECLARE that, unless excluded, the members of the class will be bound by all judgments to be rendered with respect to the class action in accordance with the law;

FIX the delay for exclusion from the Class at sixty (60) days from the date of the notice to the members, after which those members which did not avail themselves of their option to be excluded shall be bound by all judgments to be rendered with respect to the class action;

ORDER the publication of a summary notice (in accordance with article 1046 C.C.P.) to the members of the Class according to the terms to be determined by the Court;

REFER the present file to the Chief Justice for determination of the district in which the class action should be brought and to designate the Judge who shall preside over the hearing;

THE WHOLE with costs, including the cost of all notices;

MONTREAL, June 5 2015

A handwritten signature in cursive script, reading "Trudel Johnston & Lespérance".

TRUDEL JOHNSTON & LESPÉRANCE
Attorneys for the Petitioner

CANADA

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL
No.: 500-06-000743-159

(Class Action)

SUPERIOR COURT

BENEDICT MATTHEW BISSONETTE

Petitioner

- v. -

CITY OF WESTMOUNT

Respondent

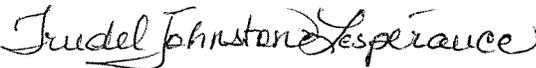
NOTICE OF PRESENTATION

CITY OF WESTMOUNT
4333 Sherbrooke Street West,
Westmount, (Quebec) H3Z 1E2

NOTICE IS HEREBY GIVEN that the present *Motion for Authorization to Institute a Class Action and Obtain the Status of Representative* will be presented for adjudication before this Honourable Court sitting in and for the District of Montreal, at the Palais de Justice, located at 1, Notre-Dame E., on the date set by the coordinating judge of the class actions chamber.

PLEASE ACT ACCORDINGLY

MONTREAL, June 5 2015



TRUDEL JOHNSTON & LESPÉRANCE
Attorneys for the Petitioner

CANADA

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL
No.: 500-06-000743-159

(Class Action)

SUPERIOR COURT

BENEDICT MATTHEW BISSONETTE

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- v. -

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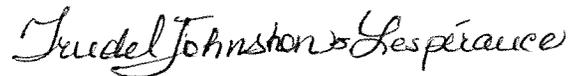
Respondent

**NOTICE OF DISCLOSURE OF EXHIBITS
(C.C.P. art. 331.2(3))**

In support of his *Motion for Authorization to Institute a Class Action and Obtain the Status of Representative*, the Petitioner discloses the following exhibits:

Exhibit P-1 Copy of an article from the *Westmount Independent*;

MONTREAL, June 5 2015



TRUDEL JOHNSTON & LESPÉRANCE
Attorneys for the Petitioner

Westmount Profile: John Garland

Still cheering for the kids

BY LAUREN SWEENEY

Westmount is losing one of its mostly widely known citizens, not by choice but by the ongoing conversion of apartment buildings to condominiums.

Lifelong resident John Garland, who headed Westmount's Parks and Recreation Department before retiring in 1987 after 34 years, is now in the throes of unpacking boxes of memorabilia in Pointe Claire.

He had been fighting eviction from his home of 42 years at the York Apartments on Sherbrooke near Grosvenor for many months.

But to no avail. And with long waiting lists at other affordable buildings in Westmount, he made the decision he never could have believed possible.

Reluctant West Islander

"I'm going because I have no choice," he said, pulling the peak of his Westmount cap even further over his brow.

"And I'm going to wear this cap everywhere in Pointe Claire," he declared.

The man known as "Johnny" to countless Westmount children and their parents from the '50s through the '80s, has since become somewhat of an institution at hockey and soccer games near and far.

After coaching Westmount's peewee hockey team for 34 years, and running the local programs, he was already known in other communities, he explains. "So when I retired in 1987, I was asked if I would come in as an independent evaluator. And it's become my pastime.

"My record is attending 539 games in one year. I kept a record of every player I watched, and quite a few went on to pro leagues."

NHL dreams come true

One was 8-year-old Vincent Lecavalier, now with Tampa Bay Lightning and one of the stars of the NHL. "When I first went to see him play he was pre-novice. Well, it didn't take a genius to spot that talent."

During the hockey season, Johnny spends afternoons at school games involving Selwyn House, John Rennie, Loyola and LCC. Then in the evenings, he's off to

inter-city games "from Valleyfield to Repentigny and Laval to the south shore."

He's been a familiar figure in the neighbourhood rushing out to clean off his car in a blinding snowstorm so he won't miss the start of a game. He wouldn't want to let the players down. "I always try to say something positive to encourage them," he says.

In spring and summer, "soccer keeps me active," he says. I follow the Lac St. Louis league. Soccer's an entirely different game to hockey because you have to be so entirely unselfish. It's why I enjoy soccer so much. Also, you don't have parents going nuts," he adds.

But Johnny's Westmount days are special.

"We had 40 hockey teams and 600 kids. Any success I enjoyed was because of the volunteers. I was just some guy who worked in Westmount, who was privileged to meet hundreds of kids and enjoyed every second of the job."

There were times when things didn't go as smoothly as he would have liked, he adds, but that's normal.

Arena opening

Johnny remembers the opening of the Westmount arena in November 1958. "It was primitive in those days. The open sides were brutal. It was like cold storage. But it was designed that way so it wouldn't become commercialized. It was always supposed to be just for the kids."

And Johnny keeps tabs on many of the players he coached, remembering them all by name. Today, many are doctors and lawyers, including one Nicholas Kasirer, now the dean of law at McGill. Now, Johnny enjoys meeting many of their sons.

Being the best at a game isn't all that makes an impression on him.

When he speaks about the young players, he's often quick to add: "and what a polite boy he is." Or, "I'm so impressed with him that I've recommended him..." for such-and-such a job.

First Family Day

Among the highlights of his career is putting together the first Family Day in 1976 – "along with my team, of course."



John Garland at his retirement party in 1987 with members of his family: From left are Johnny's nephew Gary Jackson, niece Wendy Jackson, John, his niece Gail Jackson and sister Ruth Jackson. All but Wendy worked for Westmount.

"Family Day was all Brian Gallery's idea. That was one of the best things that ever happened to Westmount." But at Johnny's retirement at Family Day in 1987 then-Mayor Gallery described Johnny as "the backbone" of the event, in what was the first public retirement sendoff off a city worker in many years. The reason, Gallery explained, "Because everybody knows Johnny Garland."

Another milestone was the city's creation of the John Garland Trophy, a sportsmanship award for first year peewee.

"When I was invited to the first presentation, I remember saying that I was overwhelmed and honoured but not looking forward to the day it becomes a memorial trophy!"

He makes a point of writing a letter of congratulations to each recipient, and treasures the letters he receives in reply. "They're always so beautifully written."

Westmouter through and through

After growing up in Westmount as a boy and going all through the school system here, he actually began working at Westmount for six years before the start of his official 34-year career, but couldn't get credit for it, he says.

"That's because my sister (Ruth Jackson) worked in the assessor's department before it was taken over by the MUC. In those days, they said they didn't want two people from the same family working for the city."

When Johnny took over as Parks and Recreation director (initially the title was superintendent), the department was combined. As a result, he was not only in charge of sports and recreation programs, but also of parks maintenance and the tree

gang, totalling more than 100 employees. Much of this work is now outsourced.

"I had real pros looking after everything," he says. "People like Buddy Selby (parks), Leo McGregor (tree gang) and Howard Neill (gardener). I was only the administrator," he adds modestly. "When I left, they took the Parks away from Recreation."

Artificial turf

"If anybody were to ask my opinion on artificial turf, I would tell them we don't need it. The size of our program doesn't warrant the cost."

And with that statement, the man who used to run Westmount's Parks and Recreation Department weighed in on the debate for renewing the soccer fields in Westmount Park.

"I can take you out to fields of artificial turf in other communities," he says, "but they're very heavily used seven days a week by children and adults for soccer and football."

"Here in Westmount, we have a youth program. All you have to do is maintain the fields regularly. Send the staff out to plug the divots (holes) and replace the worn areas with sod, not seed."

Johnny plans to keep on attending Westmount games, he says, it's simply that now he'll be commuting in an opposite direction.

He enjoys being included by current Sports and Recreation Director Mike Deegan in many of the department's events, he says.

After all, Westmount runs in his blood, and moving a few miles away isn't about to change that.

No.: 500-06-
COUR SUPÉRIEURE
(Chambre civile)
DISTRICT DE MONTRÉAL

BENEDICT MATTHEW BISSONETTE

Petitioner

v.

CITY OF WESTMOUNT

Respondent

Our file: 1336-1

BT 1415

EXHIBIT P-1

ORIGINAL

Name of attorneys : Me André Lespérance
Me Annabel Busbridge

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Tél : 514 871-8385
Fax : 514 871-8800

No.:

COUR SUPÉRIEURE
(Chambre civile)
DISTRICT DE MONTRÉAL

BENEDICT MATTHEW BISSONETTE

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(C.C.P. Articles 1002 et seq.)**

ORIGINAL

Name of attorneys : Me André Lespérance
Me Annabel Busbridge

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