

114. It is not costing the defendants anything in defending this action. The costs are covered by the taxpayers' money. The defendants' flagrant violations and high-handed actions are compounded with threats of costs towards the plaintiff who has nothing to lose, but everything to hope for. As such the plaintiff requests that this court exercise its discretion and allow the plaintiff to hold the defendants accountable for their actions at no cost to him.

115. The plaintiff asks this court that based on the information provided under parts two and three of this factum, the supporting affidavits, statements and analysis of the disclosure provided via the HRTO application, all of which is contained in Schedule A of his motion reply to weigh the evidence and issue an order for summary judgement for costs pursuant to rule 20.01(1) of the Rules of Civil Procedure, R.R.O. 1990, Reg. 194.

ALL OF WHICH IS RESPECTFULLY SUBMITTED,

Date: Friday, February 28, 2014



Michael Jack
c/o Lloyd Tapp