

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

*(Court Seal)*

THE NEIGHBOURHOOD GROUP COMMUNITY SERVICES, JEAN-PIERRE AUBRY FORGUES  
and KATHARINE RESENDES

Applicants

and

HIS MAJESTY THE KING IN RIGHT OF ONTARIO

Respondent

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

**AFFIDAVIT OF PHILIP PRICE**

I, Philip Price, of the City of Kitchener, in the Province of Ontario, MAKE OATH AND  
SAY:

1. I have two children, aged 3 and 4.5, who attend and attended the Duke Street Childcare Centre operated by the YWCA Kitchener-Waterloo, which operates across the street from the Consumption and Treatment Site (the “CTS”) located at 150 Duke Street West, Kitchener.

2. As such I have knowledge of the matters contained in this affidavit. Where I do not have direct knowledge of a matter, I have stated the source of my information and belief and verily believe that information to be true.

**A. The Neighborhood before the CTS Opened**

3. From 2016 to 2024 I lived in downtown Kitchener and would often walk my children to daycare, occasionally walking near the CTS. My oldest son is now in kindergarten, but my younger son still attends the Duke Street Childcare Centre located at 111 Duke Street West, Kitchener. The daycare often takes the children out for walks around the neighbourhood and they walk near the CTS.

4. I work at City Hall which is located at 200 King Street West, Kitchener, approximately 62 meters from the CTS. The windows of my office look out onto the CTS. The Duke Street Childcare Centre is located on the second floor of Kitchener City Hall.

5. Prior to the CTS opening, I noticed street-involved people in this area of Kitchener. During my work day, I would regularly see people passed out and slumped over in and around City Hall.

6. In late 2018, before the opening of the CTS, there was an overdose right outside my office. A paramedic tried to resuscitate the person, but I'm not sure the person survived. Witnessing this overdose was a traumatic and stressful experience for me.

**B. Opening of the CTS in 2019**

7. The opening of the CTS eased some of my concerns regarding overdoses in the area.

8. I have noticed a marked decrease in the amount of interaction I have observed between City Hall security guards and street involved people since the CTS opened.

9. Since the CTS has opened, I've never observed police there. I've seen police and Emergency Medical Services at the neighbouring church at 23 Water Street North, Kitchener, but never at the CTS.

10. I have never seen open drug use outside the CTS.

11. The presence of the CTS has put me at ease. It's made me feel good about my children's experience at their daycare. With the CTS open, I know that overdoses are being prevented and that people are using drugs more safely than before. I have never seen discarded needles near or around the CTS. I feel more comfortable when the daycare takes the children out on walks knowing that the CTS is offering the services it does.

12. I have never once heard any concerns about the CTS from the daycare staff or any parents of any children at the daycare.

### **C. Conclusion**

13. The neighbourhood has improved since the CTS has opened.

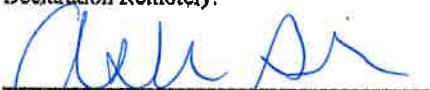
14. If the CTS were to close, I would worry about the safety of my children in the area. I would also worry about the safety of those who attend the CTS. The CTS has made me feel more comfortable, knowing that overdoses are being prevented and that people are using safely.

15. On September 25, 2024, the Regional Municipality of Waterloo Council passed a motion urging the Ontario government to continue funding the CTS beyond the proposed termination date

date of March 2025. Attached hereto and marked as Exhibit "A" to my affidavit are excerpts from the September 25, 2024, Council Minutes that relate to this issue. Similarly, on October 1, 2024, the City of Kitchener Council passed a similar motion asking the Ontario government to continue to permit the operation and funding of the Kitchener CTS. Attached hereto and marked as Exhibit "B" to my affidavit are excerpts from the October 1, 2024, Council Minutes that relate to this issue. I support both of these motions by my municipal officials and hope that our CTS can continue to operate.

15. I affirm this affidavit in support of the Applicant's application and for no further or other purpose.

AFFIRMED REMOTELY by video conference from the City of Kitchener, in the Province of Ontario (Location of the Deponent), before me at the City of Kitchener, in the Province of Ontario (Location of the Commissioner), on February 6, 2025, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

  
Commissioner for Taking Affidavits  
(see the reverse side)

  
PHILIP PRICE

**ASHLEY SCHUITEMA,**  
a Commissioner, etc.,  
Province of Ontario,  
while a Barrister and Solicitor.  
LSO #68257G

THIS IS **EXHIBIT "A"** REFERRED TO  
IN THE AFFIDAVIT OF PHILIP PRICE  
AFFIRMED THIS 6<sup>TH</sup> DAY OF FEBRUARY, 2025



**ASHLEY SCHUITEMA,**  
a Commissioner, etc.,  
Province of Ontario,  
while a Barrister and Solicitor.  
LSO #68257G

## Regional Council Minutes

September 25, 2024, 7:00 p.m.  
Council Chambers



Members Present: K. Redman, D. Craig, R. Deutschmann, J. Erb, S. Foxtton, M. Harris, C. Huinink, C. James, J. Liggett, D. McCabe, J. Nowak, N. Salonen, S. Shantz, K. Williams, P. Wolf

Members Absent: B. Vrbanovic

Should you require an alternative format or a copy of the official minutes please contact the Regional Clerk at Tel.: 519-575-4400, TTY: 519-575-4605, or [regionalclerk@regionofwaterloo.ca](mailto:regionalclerk@regionofwaterloo.ca)

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### 1. Call to Order

Regional Chair K. Redman called the meeting to order at 7:00 p.m.

### 2. Land Acknowledgement

Regional Chair K. Redman provided a land acknowledgement.

M. Harris joined the meeting at 7:01 pm.

### 3. Motion to Reconvene into Open Session

J. Liggett left the meeting at 7:02 pm.

Moved by C. James

Seconded by S. Foxtton

That Council reconvene into Open Session.

In Favor (14): K. Redman, D. Craig, R. Deutschmann, J. Erb, S. Foxtton, M. Harris, C. Huinink, C. James, D. McCabe, J. Nowak, N. Salonen, S. Shantz, K. Williams, and P. Wolf

**Carried (14 to 0)**

## 10.1 Committee Reports

### 10.1.1 Administration and Finance Committee Summary - September 10, 2024

Moved by P. Wolf

Seconded by N. Salonen

That the following recommendations from the Administration and Finance Committee be approved:

1. That the Regional Municipality of Waterloo approve the expenditure of up to \$150,000 from the Public Art Reserve for a permanent public artwork at the Langs Drive Redevelopment, 589 Langs Drive, Cambridge.

In Favor (15): K. Redman, D. Craig, R. Deutschmann, J. Erb, S. Foxton, M. Harris, C. Huinink, C. James, J. Liggett, D. McCabe, J. Nowak, N. Salonen, S. Shantz, K. Williams, and P. Wolf

**Carried (15 to 0)**

### 10.1.2 Community and Health Services Summary - September 10, 2024

Moved by J. Erb

Seconded by S. Shantz

That the following recommendations from the Community and Health Services Committee be approved:

1. That the Regional Municipality of Waterloo approve the Response Time Performance Plan (RTPP) for 2025, outlined below, in accordance with the Ambulance Act, O. Reg. 267/08, amending O. Reg. 257/00, under Part VII, Response Time Performance Plans, Sections 22-24, as outlined in PHP-PSV-24-004, dated September 10, 2024.
  - a. Sudden Cardiac Arrest (SCA) – 6 minutes or less 70% of the time. (Note: Ministry of Health target is 50%.)
  - b. CTAS 1 – 8 minutes or less 70% of the time.
  - c. CTAS 2 – 10 minutes or less 80% of the time.
  - d. CTAS 3 – 15 minutes or less 80% of the time.
  - e. CTAS 4 – 20 minutes or less 80% of the time.

- f. CTAS 5 – 25 minutes or less 80% of the time.
2. WHEREAS one person dies every 2.5 hours from the toxic drug supply in Ontario;

AND WHEREAS Safe Consumption Sites, also known as Consumption and Treatment Sites, have been instrumental in preventing thousands of drug overdose deaths;

AND WHEREAS crime statistics from the Waterloo Regional Police Services indicate that the Kitchener Consumption and Treatment Site has not been linked to an increase in crime in its vicinity;

AND WHEREAS closing Consumption and Treatment Sites will lead to increased drug use in public spaces;

AND WHEREAS the closure of these sites would place additional strain on emergency services and the healthcare system;

AND WHEREAS Consumption and Treatment Sites offer access to other health and medical services, aligning with the objectives of the HART hub planned by the Ontario Government;

AND WHEREAS healthcare should emphasize prevention as well as treatment;

THEREFORE BE IT RESOLVED THAT the Region of Waterloo Council urges the Ontario government to continue funding all currently operating Consumption and Treatment Sites beyond the proposed termination date in March 2025.

AND BE IT FURTHER RESOLVED THAT the Ontario government is encouraged to maintain funding for the proposed HART hubs.

AND BE IT FURTHER RESOLVED THAT this resolution be forwarded to the Premier of Ontario, the Minister of Finance, the Health Minister and to municipalities that currently have an operating Consumption and Treatment Site/Safe Consumption Site.

And be it further resolved that the Ontario government does not take steps to pass legislation that would prohibit the



establishment of temporary Urgent Public Health Needs Sites (UPHNS).

In Favor (13): K. Redman, D. Craig, R. Deutschmann, J. Erb, S. Foxton, M. Harris, C. Huinink, C. James, D. McCabe, J. Nowak, S. Shantz, K. Williams, and P. Wolf

Opposed (2): J. Liggett, and N. Salonen

**Carried (13 to 2)**

### 10.1.3 Sustainability, Infrastructure, and Development Committee Summary - September 10, 2024

Moved by S. Foxton

Seconded by D. McCabe

That the following recommendations from the Sustainability, Infrastructure, and Development Committee be approved:

1. That the Regional Municipality of Waterloo approve the expropriation of lands for improvements at the intersection of Fischer Hallman Road (Regional Road 50) and New Dundee Road (Regional Road 12), in the City of Kitchener and in the Township of North Dumfries, in the Regional Municipality of Waterloo, as detailed in Report PDL-LEG-24-023, dated September 10, 2024, described as follows: Fee Simple Partial Taking:
  - i. Part of Lot 9, Beasley's New Survey, Township of Waterloo, being Parts 1 and 3 on 58R-21999, (Part of PIN 22723-0035), City of Kitchener (2315 Fischer Hallman Road, City of Kitchener)
  - ii. Part of Lot 9, Beasley's New Survey, Township of Waterloo, being Parts 1 and 3 on 58R-21999, (Part of PIN 22723-0035), City of Kitchener (2315 Fischer Hallman Road, City of Kitchener)
  - iii. Part of Lot 9, Beasley's New Survey, Township of Waterloo, being Parts 1 and 3 on 58R-21999, (Part of PIN 22723-0035), City of Kitchener (2315 Fischer Hallman Road, City of Kitchener)

**Carried**

**18.4 By-law 24-035**

Moved by C. Huinink  
Seconded by K. Williams

That a By-law to Expropriate Lands for the Construction of a Roundabout at the Intersection of Fischer Hallman Road and New Dundee Road, in the City of Kitchener and in the Township of North Dumfries, , be read a first, second and third time, finally passed and numbered 24-035, be signed by the Regional Chair and Regional Clerk and sealed with the Regional Seal.

**Carried**

**18.5 By-law 24-036**

Moved by C. Huinink  
Seconded by K. Williams

That a By-law to Expropriate Lands for the Construction of a Roundabout at the Intersection of Roseville Road and Edworthy Side Road, in the Township of North Dumfries, in The Regional Municipality of Waterloo, be read a first, second and third time, finally passed and numbered 24-036, be signed by the Regional Chair and Regional Clerk and sealed with the Regional Seal.

**Carried**

**18.6 By-law 24-037**

Moved by C. Huinink  
Seconded by K. Williams

That a By-law to Confirm the Proceedings of the Council of the Regional Municipality of Waterloo at this Meeting Held on September 25, 2024 be read a first, second and third time, finally passed and numbered 24-037, be signed by the Regional Chair and Regional Clerk and sealed with the Regional Seal.

**Carried**

**19. Adjourn**

M. Harris joined the meeting at 10:14 p.m.

Moved by M. Harris

Seconded by N. Salonen

That the meeting adjourn at 10:14 p.m.

In Favor (14): K. Redman, D. Craig, R. Deutschmann, J. Erb, S. Foxton, M. Harris, C. Huinink, C. James, D. McCabe, J. Nowak, N. Salonen, S. Shantz, K. Williams, and P. Wolf

**Carried (14 to 0)**

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Regional Clerk

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Regional Chair

THIS IS **EXHIBIT "B"** REFERRED TO  
IN THE AFFIDAVIT OF PHILIP PRICE  
AFFIRMED THIS 6<sup>TH</sup> DAY OF FEBRUARY, 2025



**ASHLEY SCHUITEMA,**  
a Commissioner, etc.,  
Province of Ontario,  
while a Barrister and Solicitor.  
LSO #68257G



## **Council Meeting Minutes**

**September 30, 2024, 7:00 p.m.**

**Council Chambers - Hybrid**

**City of Kitchener**

**200 King Street W, Kitchener, ON N2G 4G7**

**Present:**

Mayor B. Vrbanovic  
Councillor S. Davey  
Councillor D. Schnider  
Councillor J. Deneault  
Councillor C. Michaud  
Councillor A. Owodunni  
Councillor P. Singh  
Councillor B. Ioannidis  
Councillor M. Johnston  
Councillor D. Chapman  
Councillor S. Stretch

**Staff:**

D. Chapman, Chief Administrative Officer  
M. May, General Manager, Community Services and Deputy  
Chief Administrator  
V. Raab, General Manager, Corporate Services  
J. Readman, General Manager, Development Services  
J. Lautenbach, Chief Financial Officer, Financial Services  
D. McGoldrick, General Manager, Infrastructure Services  
L. MacDonald, City Solicitor  
B. Rowland, Director, Corporate Communications and Marketing  
B. Lam, Director, Sanitary & Stormwater Utility  
A. Fusco, Director Legislated Services / City Clerk  
N. Goss, Manager, Policy & Research  
D. Saunderson, Deputy Clerk  
A. Clark, Senior Urban Designer  
J. Zunic, Senior Planner

Councillor D. Schneider left and returned to the meeting at this time.

Dillyn Lankin, Emily Jordan, Mauleek Bhatt, delegated in support of the CTS and advocating to the Province to maintain the existing site.

#### **6.8 Suspend the Rules - Motion to go Beyond Midnight**

In accordance with Municipal Code Chapter 25 (Procedural By-law), Section 25.2.2 (Suspend the Rules), Mayor B. Vrbanovic requested a motion to suspend the rules to extend the proceedings of Council past midnight.

**Moved by Councillor S. Davey**

**Seconded by Councillor C. Michaud**

“That approval be given for this meeting of Council to proceed for an additional hour beyond 12:00 a.m.”

**Carried, unanimously**

#### **6.9 Notice of Motion - D. Chapman - Consumption and Treatment Sites, listed as Item 9.3 (Cont'd)**

David Hopkins encouraged Council to support the motion and stressed the important role of Council to advocate for their residents.

Councillor M. Johnston left and returned to the meeting at this time.

Councillor A. Owodunni left the meeting at this time.

Krista Hicks, delegated in support of the motion.

Councillor A. Owodunni returned to the meeting at this time.

Mayor B. Vrbanovic left the meeting at this time. Councillor S. Davey assumed the role of the Chair.

Alaina Klassen addressed Council in support of the notice of motion.

Mayor B. Vrbanovic returned to the meeting at this time and assumed the Chair.

Ashley Schuitema encouraged Council to support the proposed notice of motion.

Councillor J. Deneault left and returned to the meeting at this time.

Councillor P. Singh left and returned to the meeting at this time.

William Turman, on behalf of the Downtown Advisory Committee (DAC) expressed support for the proposed motion.

Simon Guthrie, Dawn Eveland, Chris Varga and Kevin White addressed Council in support of the CTS and the proposed notice of motion.

**6.10 Suspend the Rules - Motion to go Beyond 1:00 a.m.**

In accordance with Municipal Code Chapter 25 (Procedural By-law), Section 25.2.2 (Suspend the Rules), Mayor B. Vrbanovic requested a motion to suspend the rules to extend the proceedings of Council an additional hour beyond 1:00 a.m.

**Moved by Councillor P. Singh**

**Seconded by Councillor S. Stretch**

“That approval be given for this meeting of Council to proceed for an additional hour beyond 1:00 a.m.”

**Carried, unanimously**

**6.11 Notice of Motion - D. Chapman - Consumption and Treatment Sites, listed as Item 9.3 (Cont'd)**

Councillor D. Chapman requested a recorded vote.

Councillor D. Schnider stated he had a further Notice of Motion related to advocacy that he wished to bring forward that would provide additional direction to the Region of Waterloo on the Consumption and Treatment Services site.

Councillor D. Schnider brought forward a second notice of motion, which was seconded by Councillor S. Stretch, as follows:

"WHEREAS the Province of Ontario intends to close the Consumption Treatment Services (CTS) Centre located in Kitchener when they introduce their Homeless and Addiction Recovery Treatment (HART) Hubs;

WHEREAS the CTS Centre in Kitchener is operated by Sanguen Health Centre, a Ministry Of Health Funded Agency supporting those marginalized through substance abuse, mental health issues, homelessness and chronic poverty; and,

WHEREAS the CTS Centre in Kitchener is operated in partnership with the Region of Waterloo Public Health and Emergency Services; and,

WHEREAS Kitchener, the lower tier municipality in our two-tier system lacks the jurisdiction, and therefore, trained staff with knowledge or

experience of CTS sites to prepare reports or otherwise educate a council;  
and,

WHEREAS closure of the CTS centre is causing concern in our  
Community;

THEREFORE BE IT RESOLVED that the City of Kitchener ask and  
encourage that the Regional Chair request Minister of Health Sylvia Jones  
and Associate Minister of Mental Health and Addictions Michael Tibollo, to  
meet with local service providers and experts to hear concerns and  
investigate if the CTS Centre, or portions of it can be integrated into the  
HART Hub Model and be part of the continuum of care that includes  
treatment, and support for positive long-term outcomes here, and in other  
communities where a CTS is intended to be closed;

THEREFORE BE IT FURTHER RESOLVED that service providers and  
experts in the areas of addiction, mental health, homelessness and  
supportive housing included in the meeting would be best selected by the  
Region including but not limited to the Chair, Acting CAO and Public  
Health Manager;

THEREFORE BE IT FINALLY RESOLVED that this resolution be sent to  
the Chair of The Region Of Waterloo, the Premier of Ontario, Health  
Minister Sylvia Jones and Associate Minister of Mental Health and  
Addictions Michael Tibollo and municipalities that have a Consumption  
Treat Services Centre that is intending to be closed."

**Moved by Councillor D. Chapman**

**Seconded by Councillor S. Stretch**

"WHEREAS one person dies every 2.5 hours from the toxic drug supply in  
Ontario; and, thus far in 2024 within Waterloo region, 98 residents are  
suspected to have died from drug poisoning, or one un-prevented death  
every 2.5 days; and,

WHEREAS Supervised Consumption Sites, including Consumption and  
Treatment Services sites, have been instrumental in preventing thousands  
of drug poisoning/overdose deaths; and,

WHEREAS crime statistics provided by Waterloo Regional Police Service  
indicate a decline in several crimes in the vicinity of the Consumption and  
Treatment Service site since it was established in 2019; and,

WHEREAS the daycare across the street from the Consumption and



Treatment Services site suggests the neighbourhood is better off since the facility opened; and,

WHEREAS closing Consumption and Treatment Services site is expected to cause deaths and other harms, increased drug use in public spaces; and,

WHEREAS the closure of the Kitchener site will place additional strain on emergency services, staff of area non-profit agencies, and the healthcare system; and,

WHEREAS the Consumption and Treatment Services site provides a range of health, medical, and social services, not accessible elsewhere; and,

WHEREAS healthcare should emphasize prevention, harm reduction as well as treatment, including voluntary, evidence-based addiction treatment on demand;

THEREFORE BE IT RESOLVED THAT the City of Kitchener Council urges the Ontario government to continue to permit the operation and funding of the Kitchener CTS, subject to the agreement of the City of Kitchener and the Region of Waterloo, as well as funding all currently operating Consumption and Treatment Sites beyond the proposed termination date in March 2025;

THEREFORE BE IT RESOLVED THAT the Ontario government is encouraged to maintain if not expand funding for the proposed HART hubs;

THEREFORE BE IT FURTHER RESOLVED THAT the Ontario Government is encouraged to not take steps to prohibit the establishment of supervised consumption sites, including Urgent Public Health Needs Sites (UPHNS);

THEREFORE BE IT FINALLY RESOLVED THAT this resolution be forwarded to the Premier of Ontario, the Minister of Finance, the Health Minister, AMO and to municipalities that currently have an operating Consumption and Treatment Service and/or Supervised Consumption Site(s)."

**In Favour (10):** Mayor B. Vrbanovic, Councillor S. Davey, Councillor D. Schnider, Councillor J. Deneault, Councillor C. Michaud, Councillor P. Singh, Councillor B. Ioannidis, Councillor M. Johnston, Councillor D. Chapman, and Councillor S. Stretch

**Contra (1):** Councillor A. Owodunni

**Carried, as amended, on a recorded vote (10 to 1)**

**Moved by Councillor D. Schnider**

**Seconded by Councillor S. Stretch**

"WHEREAS the Province of Ontario intends to close the Consumption Treatment Services (CTS) Centre located in Kitchener when they introduce their Homeless and Addiction Recovery Treatment (HART) Hubs;

WHEREAS the CTS Centre in Kitchener is operated by Sanguen Health Centre, a Ministry Of Health Funded Agency supporting those marginalized through substance abuse, mental health issues, homelessness and chronic poverty; and,

WHEREAS the CTS Centre in Kitchener is operated in partnership with the Region of Waterloo Public Health and Emergency Services; and,

WHEREAS Kitchener, the lower tier municipality in our two-tier system lacks the jurisdiction, and therefore, trained staff with knowledge or experience of CTS sites to prepare reports or otherwise educate a council; and,

WHEREAS closure of the CTS centre is causing concern in our Community;

THEREFORE BE IT RESOLVED that the City of Kitchener ask and encourage that the Regional Chair request Minister of Health Sylvia Jones and Associate Minister of Mental Health and Addictions Michael Tibollo, to meet with local service providers and experts to hear concerns and investigate if the CTS Centre, or portions of it can be integrated into the HART Hub Model and be part of the continuum of care that includes treatment, and support for positive long-term outcomes here, and in other communities where a CTS is intended to be closed;

THEREFORE BE IT FURTHER RESOLVED that service providers and experts in the areas of addiction, mental health, homelessness and supportive housing included in the meeting would be best selected by the Region including but not limited to the Chair, Acting CAO and Public Health Manager;

THEREFORE BE IT FINALLY RESOLVED that this resolution be sent to the Chair of The Region Of Waterloo, the Premier of Ontario, Health Minister Sylvia Jones and Associate Minister of Mental Health and Addictions Michael Tibollo and municipalities that have a Consumption Treat Services Centre that is intending to be closed."

**In Favour (11):** Mayor B. Vrbanovic, Councillor S. Davey, Councillor D. Schnider, Councillor J. Deneault, Councillor C. Michaud, Councillor A. Owodunni, Councillor P. Singh, Councillor B. Ioannidis, Councillor M. Johnston, Councillor D. Chapman, and Councillor S. Stretch

**Carried (11 to 0)**

## **7. REPORTS OF COMMITTEES**

### **7.1 FINANCE AND CORPORATE SERVICES COMMITTEE - SEPTEMBER 16, 2024**

The Mayor noted that a written submission was received from VanMar Constructors in support of the staff recommendation as outlined in Addendum Report CSD-2024-449 related to the public engagement related to their noise exemption request.

Councillor S. Davey brought forward the report of Finance and Corporate Services Committee, dated September 16, 2024, including an amendment related to item 7.1.c Noise Exemption, VanMar Constructors On Inc, 641 King Street West, that the staff recommendation as outlined in CSD-2024-408, to deny the noise exemption be approved, which was seconded by Councillor B. Ioannidis.

Due to the previously declared conflict by Councillor J. Denault item 7.1.b. was voted on separately and was **Carried**.

The balance of the Finance and Corporate Services Committee was then voted on and was **Carried**.

(By-law 2024-168)

**Carried**

**14. ACKNOWLEDGEMENT - DIANNA SAUNDERSON**

Mayor B. Vrbanovic acknowledged D. Saunderson, Manager, Council and Committee Services / Deputy Clerk, congratulating her on 25 years of municipal service with the City of Kitchener.

**15. ADJOURNMENT**

On motion, the meeting adjourned at 1:35 a.m.

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Mayor

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Clerk

THE NEIGHBOURHOOD GROUP  
COMMUNITY SERVICES et al.

Applicants

and HIS MAJESTY THE KING IN RIGHT  
OF ONTARIO

Respondent

Court File No. CV-24-00732861-0000

***ONTARIO***

SUPERIOR COURT OF JUSTICE

Proceeding commenced at TORONTO

**AFFIDAVIT OF PHILIP PRICE**

**LAX O'SULLIVAN LISUS GOTTLIEB LLP**

145 King Street West, Suite 2750

Toronto ON M5H 1J8

Rahool P. Agarwal (54528I)

[ragarwal@lolg.ca](mailto:ragarwal@lolg.ca)

**STOCKWOODS LLP**

77 King Street West, Suite 4130

Toronto ON M5K 1H1

Carlo Di Carlo (62159L)

[carlodc@stockwoods.ca](mailto:carlodc@stockwoods.ca)

Olivia Eng (84895P)

[oliviae@stockwoods.ca](mailto:oliviae@stockwoods.ca)

**NANDA & COMPANY**

10007 80 Avenue NW

Edmonton AB T6E 1T4

Avnish Nanda (LSA 18732)

[avnish@nandalaw.ca](mailto:avnish@nandalaw.ca)

Lawyers for the Applicants