

This is Exhibit " G " referred to in the  
affidavit of Lionel Andre Bouchard  
sworn before me at Maple Ridge  
this 8 day of Apr 2011  
[Signature]  
A Commissioner for Taking Affidavits

December 7, 2010

To Whom It May Concern,

Lionel Bouchard, age 86  $\frac{3}{4}$ , has been a patient of mine since February 2008.

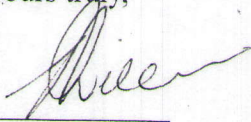
During the course of the past three years, I have attended to Mr. Bouchard regularly, almost on a monthly basis for regular check-ups, flu shots, renewal of his blood pressure pills and other medications, quite normal for someone of Mr. Bouchard's age.

As I have stated previously, Mr. Bouchard is very competent to look after his own affairs.

The reason for Mr. Bouchard's initial visit with me at the Care Clinic here in Maple Ridge, B.C. in February 2008, was as a result of the panic and stress he was experiencing, this after after just having received a call from his daughter, Lynda Staub of Manitoba, accusing him of something very preposterous - simply in order to keep him out of Manitoba!

I wish to go on record stating my concerns over the abuse and stress that Mr. Bouchard's family of Manitoba, have subjected him to over the years since I have had Lionel as a patient.

Yours truly,



Dr. P. Williams  
22323 Selkirk Avenue  
Maple Ridge, B.C.  
V2X 2X6

January 21, 2010

Via Fax: 204-945-7130

Court of Queens Bench  
408 York Avenue,  
Winnipeg, Manitoba

File # 090192671

File # 090192674

File # 090192675

Re: Lionel Bouchard

With respect to Mr. Lionel Bouchard, Mr. Bouchard has been a patient of mine since the spring of 2008.

Since then, Mr. Bouchard continues on a monthly basis to visit my offices in order to renew his prescriptions for high blood pressure, etc.

In 2009, Mr. Bouchard underwent a medical competency examination for his driver licence.

In my opinion Mr. Lionel Bouchard appears competent to deal with his own affairs and quite capable of making decisions on his own.



---

Dr. P. Williams

**DR. P. WILLIAMS**  
22313 Selkirk Avenue  
Maple Ridge, B.C.  
V2X 2X6

December 7, 2010

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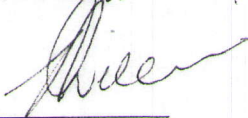
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Yours truly,



Dr. P. Williams  
22323 Selkird Avenue  
Maple Ridge, B.C.  
V2X 2X6

Although there is, of course, no legal restriction in the parties to a conflict discussing resolution of issues between themselves, there are a few reasons why I would suggest they not do so in this case until the terms of any settlement are finalized between counsel. In saying this, I realize that your client may be looking for suitable accommodation for his father, but I suggest even this step be guided by counsel to ensure we are all on the same page.

In this case, be aware of the following reasons why I am convinced that counsel be the only negotiators:

(a) In the circumstances of this case there is a presumption on your client of undue influence in achieving any settlement of any issues between father and son that would not be arguable if the settlement process were conducted between their respective counsel and, thus, they each have received independent legal advice;

(b) Your client apparently brought Dr. Bruce Jamieson to the Sunday meeting of the parties to discuss settlement, much to the surprise of my client and Mr. Slegers. I am advised that Dr. Jamieson apparently conducted an interview of my client and pronounced him capable of handling his own affairs! If your client did in fact invite this doctor to be present to examine my client, he has acted inappropriately to say the least and clearly has attempted to prejudice my client's rights; and

(c) As I told you over the telephone on Tuesday, last, at that same meeting your client presented my client with two discharges of the two caveats our office registered against the farm lands. Apparently, they were drafted by a daughter of my client, Lynda Staub, who is an employee of the Land Titles Office. Such action was also inappropriate in view of the fact that this action is an obvious attempt to take advantage of my client and, once again, to prejudice his rights by having him discharge his legitimate claims against his son. This is particularly reprehensible behavior in the face of their knowledge that their father has legal counsel.

Accordingly, in addition to your request to your client to tell his father to call me at the above number as soon as possible, I request you advise your client to then stay away from my client and not to have any further contact whatsoever with him except as advised by you, his counsel, as such contact may be agreed between counsel.

Thank-you,

Winston

Winston F. Smith, Q.C.  
Hook & Smith  
Barristers, Solicitors & Notaries Public  
201-3111 Portage Ave.  
Winnipeg, Manitoba  
R3K 0W4  
off: 204-885-4520  
fax: 204-837-9846  
res: 204-488-0765  
cel: 204-955-0001  
email: wsmith@hookandsmith.com

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No virus found in this incoming message.

19/08/2008

Mar. 1. 2006 4:21PM

ssiz Med cal Cert's

Vo. 1/54 P. 4/4

(029585) BOUCHARD LIONEL

PO Box 127

ELIE MB ROE OH0

AltID-

Male (82) 22Jan24

Ins: 277639/103065440

[ CT:NOC ]

(cons)

Page 3

LV: \*not found\*

Home: (204) 353-5820

Work: N/A

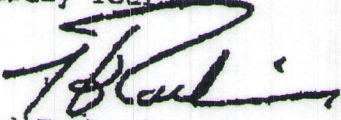
CONSULTANT LETTER  
Cholinesterase inhibitors.

(cons)

February 21, 2006

If family feel Mr. Bouchard is not competent to handle his own affairs and there is any intention of pursuing this in the courts, I would suggest referring Mr. Bouchard to Dr. Barry Campbell at St. Boniface Hospital for a formal competency assessment. In my view he is capable of fully participating in decisions related to finances, health and living circumstances. Thanks for referring this very pleasant man.

Sincerely Yours



Howard Zacharias, M.D.  
HZ/sdk

CC Bruce Jamieson

**Marlene Legare, CFP**

---

**From:** Kelly Land [kpl@cgklaw.ca]  
**Sent:** Monday, August 18, 2008 7:11 AM  
**To:** Winston Smith  
**Subject:** Re: Bouchard v. Bouchard

Winston

I am out of the office for the next few days. I am aware thought my client, who in turn has been advised by Mr. Slegers, that your client is being pushed very hard from Marlene in BC.

We have been guided in this matter by your strong assertion that your client is competent and capable of giving instruction regardless of the family pressure he is under.

My client does not want to be seen as trying to manipulate the situation and therefore I have advised him to avoid initiating any discussion with his father until the matters are resolved. He has accepted that Mr. Slegers will look after his fathers interests as a neutral third party and communicate anything of a personal nature to my client. All legal matters remain between our offices.

I await your letter of settlement once you have your instructions from Mr. Bouchard at your earliest convenience.

Kelly P. Land  
Chapman Goddard Kagan  
Barristers & Solicitors  
1864 Portage Avenue  
Winnipeg, MB R3J 0H2  
Ph: (204) 888-7973  
Fax:(204) 832-3461

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----- Original Message -----

**From:** Winston Smith  
**To:** kpl@cgklaw.ca  
**Sent:** Friday, August 15, 2008 2:08 PM  
**Subject:** RE: Bouchard v. Bouchard

Kelly,

I am presently out of the office and will be absent until August 26th.

Before leaving my office yesterday I drafted a letter to you setting forth the proposal to settle both the life estate and debt claim issues. During the course of my meeting with my client over the last few days, I realized that your client appears to be in contact with my client. In fact Andy called my office on Tuesday looking for Mike Slegers and, apparently, had been waiting for both Mr. Slegers and my client outside my office as they had traveled together from Elie to Winnipeg. The association seemed to be a follow-up to the meeting on Sunday between our respective clients and Mr. Slegers at which the initial settlement discussions commenced.

I now am awaiting my client's review and approval of the settlement proposal before I can send it on to you. However, despite my efforts to contact my client or Mr. Slegers, I am unable to do so and the reason for that is he, apparently, is meeting with your client and Mr. Slegers. Would you be so kind as to call your client and ask him to have his father call me at my lake number 1-204-349-8470.

Although there is, of course, no legal restriction in the parties to a conflict discussing resolution of issues between themselves, there are a few reasons why I would suggest they not do so in this case until the terms of any settlement are

535) BOUCHARD LIONEL  
Box 127  
MB ROH OHO

AltID-  
Male (82) 22Jan24  
Ins: 277639/103065440  
[ CT:NOC ]

February 21, 2006 *JM*

CONSULTANT LETTER

Mr. Bouchard reports that he is separated from his wife as of some 20 years ago. He remained living on a rural property with a small acreage. He eventually sold the acreage to his son with an agreement that he could remain living in the house as long as he was capable of doing so. He enjoys working with his son, has done some combining for his son's business a year ago and feels he could still do that. He also reports that he sells fish which he purchases from suppliers on Lake Winnipeg and then drives to customers, but he feels he may have to give this up due to his age and the long distances involved. He has been cooperative about not driving since his accident but has hopes of being able to drive locally in the future.

Mr. Bouchard is very forthcoming about his financial circumstances. He volunteered what his assets were, what his income and obligations are, where he does his banking. He has a will and he has given power of Attorney to a daughter. He took pains to explain that he wants to treat all his children fairly and equitably, but he doesn't have large savings to distribute.

He gives a detailed account of his family's circumstances. He knows all his children, their whereabouts and their jobs. He feels he has a good relationship with all of them, but he worries about motives behind the actions of his daughter from B.C.

Throughout the interview Mr. Bouchard shows a realistic and reasoned approach to his circumstances and to planning for his future. His thought content and process is linear and appropriate. He is attentive and socially appropriate. There is no evidence of a mood disorder.

In summary Mr. Bouchard understands the circumstances relevant to his situation and appreciates the consequences of various decisions he needs to make. He has a reasoned approach to decisionmaking and is eager to cooperate with family and professionals in this regard. He is concerned about being pressured by his daughter to make decisions that he does not agree with. I asked him if he felt he could stand up to this pressure and he indicated it was time that he became more firm. I asked him what he would do if she became more forceful, and he said he would have to call police and ask her not to come visit him any longer.

Mr. Bouchard has evidence of mild cognitive impairment but he is not dementing at this point. (Stage 3/6 on the Global Deterioration Scale.) I consider Lionel capable of participating fully in decisionmaking regarding his living arrangements and am confident that he meets criteria for capacity to handle finances and instruct an attorney. Medical information should be provided to family only with Mr. Bouchard's consent. From a cognitive point of view, I have no reservations about his capacity to drive, however driving competency may need to be tested further. I see no indication for his needing to be on major tranquillizers. At this stage of cognitive function there is inadequate evidence to suggest the use of Cholinesterase inhibitors. Recent studies on mild cognitive impairment have not shown benefit for





Maple Ridge Mental Health Centre  
 500 - 22470 Dewdney Trunk Road, Maple Ridge, BC V2X 5Z6  
 TEL (604) 476-7165 FAX (604) 476-7199

fraserhealth Better health.  
 Best in health care.

CONFIDENTIAL FAX TRANSMISSION

Date: September 1, 2010

To: Lionel Bouchard

Fax #: 604-465-5632

From: Heather Clark - Geriatric Mental Health

No. of pages: 4  
 (Including this cover page)

RE: Dr. Nadella's Report

The documents accompanying this fax transmission contain confidential information intended for a specific individual and purpose. The information is private and protected by law. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or taking of any action in reliance of the contents of this information is strictly prohibited. If you have received this communication in error, we apologize and ask that you notify Maple Ridge Mental Health Centre immediately by telephone at (604) 476-7165, and return the document by regular mail. Thank you.

Message:

Please find attached Dr. Nadella's dictated and signed report regarding your appointment on July 20, 2010.

Thanks.

Heather

Confidential

Urgent

RUN DATE: 11/06/10  
RUN TIME: 1535  
RUN USER: HCLARK1

\*LIVE\* Nursing C Cluster Community  
List Patient Notes

PAGE 1

Patients: BOUCHARD, LORNE ANDREY	Unit #: 01910048
Account #: 01910048	Accounting: ** MENTAL HEALTH SERVICES **
Age/Sex: 83/M	Admitted:
Location: NMT/GER	Status: PRE RCP
Room/Bed:	
Date: 11/06/10	Time: 1535
Author: Clark, Heather	Category: MHS
Recorded: 11/06/10	Category: MHS

Abnormal?  Confidential?

Writer met today with client and his daughter Marlene in the Mental Health office for an initial assessment.

Client and his daughter tell me his memory is good. He is most concerned about his upcoming assessment to renew his drivers license. Client does not have any complaints about memory or any physical concerns.

Client is independent in ADL's and IADL's. Client does not use walking aids and there have been no falls. He reports no problems with sleeping. He sleeps approximately nine hours per night. He says that his appetite is fair. He has been trying to lose weight at the advice of his physician and he has lost 40lbs over the last year. Self report of energy level and mood are good.

On cognitive testing client scored 74/100 on the 3MS and 20/30 on the MMSE. It must be taken into account that client has only received a grade three education and French is his first language, although he is fluent in English. Points were lost on mental reversal (4/7), first and second recall (7/9, 8/9), temporal and spatial orientation (14/15, 3/5), verbal fluency (4/10), similarities (1/6), repetition (2/5), and pentagon construction (7/10). Client was able to draw a clock face but could not place the hands correctly. The Luria figures were satisfactory with some significant closing in.

The test scores and previous medical history indicate that there may be a vascular dementia process starting. Our psychiatrist, Dr. Nadella, will be seeing the client on July 20th for a formal assessment. Please forward any recent medical and/or blood tests for this client. A CT scan would be helpful in making a definitive diagnosis of dementia and an ECG would be used in determining the client's eligibility for a cholinesterase inhibitor.

Writer will liase with client's GP, Dr. Williams, and daughter Marlene in the interim as necessary.

Heather Clark, BPsych, BSW, RSW

Note Type	Description
No Type	NONE

*Appt. done  
T.C.F.*

FRASER HEALTH AUTHORITY  
MAPLE RIDGE MENTAL HEALTH CENTRE  
#500 - 22470 Dewdney Trunk Road  
Maple Ridge, B.C.  
V2X 5Z6  
Telephone (604) 476-7165  
Report number: 1008-0077

Name: BOUCHARD, LIONEL ANIREY  
Unit #: J1910048  
Service Date: 20/07/10  
Birthdate: 22/01/24 Sex: M  
PHN:  
FAMILY DOCTOR: \* Dr. P. Williams

INIT. PHYSICIAN CONSULT - MR

Reason for Referral

Mr. Bouchard is an 86 year old divorced Caucasian gentleman who had been referred by his GP, Dr. Williams, for a psycho geriatric evaluation following a request from the family on his ability for self care and to look after himself. He was reviewed at Maple Ridge Mental Health Centre on the 20th of July, 2010, where he was seen along with his daughter.

History of Presenting Complaint

I was informed that Mr. Bouchard has lived all his life in Manitoba and has moved to visit his daughter about two years ago. He has been living locally for the past two years. Following his referral, he was seen for a cognitive assessment by Heather Clark, a colleague on the geriatric mental health team, who gathered all the background information. It was recorded that there was some concerns regarding the move from the family in Manitoba two years ago. Apparently, home health, the police and the PGNT were involved in the investigation and subsequently found that the client had moved on his own accord to visit his daughter. We were also informed by Lionel, as well as his daughter, that he is planning to move back to Manitoba this fall.

His daughter informed us that they wanted an assessment as he was due to have his renewal of driver's license at the time. She denied any concerns with his memory and there was no report of any acute mental health issues. He reports his sleep and appetite being normal and his mood was subjectively and objectively euthymic. He described his memory as okay, although he occasionally has some difficulty remembering names. He denied any problems with orientation within or outside the house. He denied any word finding difficulties and misplacing things. He denied any risks at home, like burning the pans, or wandering and getting lost. There was no history suggestive of confusion. He informed us that he got his driver's license renewed and his daughter explained that he doesn't drive in BC but she wants him to have his driver's license renewed, as he will need it when he returns back to Manitoba. He is apparently living with his daughter and we were made to understand that he manages his own finances.

He denied any ideas of self harm or harm to others. There was no report of paranoia or psychosis in the past or present. His attention and concentration have been good and he enjoys his walks. He is full mobile, continent and he has hearing impairment secondary to the concussion injury he suffered in 2005 and is due for a change of his hearing aid in the coming months.

Past Psychiatric History

Nil of note.

Past Medical History

Client suffered a concussion injury in 2005 after falling on ice and he had hypertension and hernia repair in the past. He has a cataract and currently wears glasses and hearing aids. He did not report any allergies to medications.

He is a non smoker and drinks alcohol on special occasions and never takes any drugs. The medication list included Amlodipine 10mg once daily, Terazosin 1mg once daily, Terazosin 2mg once daily, Ramipril 10mg once daily, Detrol 2mg once daily, Amiprosol 20mg once daily, ASA 81mg per day, Vitamin B12 and Furasemide.

#### Family and Personal History

He was born and brought up in Manitoba and the oldest of a ten sibship. His parents passed away a long time ago of natural causes. He worked for the municipality in Manitoba of road maintenance for thirty years. He was divorced about 25 years ago and had nine children with the marriage. All of the family, apart from this daughter, live back in Manitoba. He reports coming to BC to visit his daughter and now plans to go back. Following the concussion injury, we were made to understand that there was a claim that was settled with money. He reports enjoying gardening and plays bingo. He socializes well with family and friends.

He is fully independent in all of his activities of daily living.

#### Mental Status Examination

Revealed an 86 year old pleasant Caucasian male who presented with a good level of self care and his behavior was appropriate. He maintained good eye contact and no abnormal moments were noted. His speech was spontaneous and normal in tone and content. His mood was subjectively and objectively euthymic and there were no ideas of self harm or harm to others. There were no thought or perceptual abnormalities to report. With regard to his cognition, an initial assessment by Heather he scored 20/30 on MMSE and 74/100 on 3MS. Learning about the scores, Mr. Bouchard and his daughter informed that he had only a grade three level education and had difficulties spelling the words and arithmetics. When I repeated the MMSE today he scored about 25/30 and attention and calculation have been taken away he scored 22/25. He lost one point on delayed recall, one on three stage command, one on copying intersecting pentagons. He is orientated to time place and person and his attention and concentration were within normal range. He was able to give logical history. No major short term or long term memory difficulties were noted apart from some difficulties remembering names. He has good insight and his judgment is in tact.

In summary, Mr. Bouchard is an 86 year old divorced Caucasian gentleman who was referred for a geriatric assessment of his ability to self care on the request of the family. There were no mental health concerns from the family or the client, and lost a few points on the MMS and MMMS with the CT report suggestive of advanced involuntional changes related to age. It is possible from the CT report and difficulties remembering names and cognitive assessment scores that early dementia is setting in. No risks were identified at this time, due to his cognitive deficits.

#### Diagnosis

- Axis I - Cognitive disorder (NOS), Mild cognitive impairment, Query to rule out mild dementia, possibly Alzheimer's type.
- Axis II - None
- Axis III - History of concussion injury, hypertension and hernia repair. Some hearing and visual impairment secondary to cataract.
- Axis V - GAF = 70

#### Management Plan

I have explained to both Mr. Bouchard and his daughter about the possibility of mild

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dementia, which needs further review of his cognitive testing given his educational background. I have also informed about the irreversibility and progressive nature of dementia and the current available treatment options. Given his impending move in the fall, he was not keen for a trial of cognitive enhancers at this time, but I have advised him to see his family practitioner on return to Manitoba if he notices any further deterioration in his cognition or wishes to be considered for cognitive enhancers. He was discharged back to his GP's care.

*R. Nadella*

DR. RAJASREE NADELLA

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\*\*Subject to revision within 10 days of transcription

Transcribed by: Macrae, Sarah  
Dictated by: NADELLA, RAJASREE

Date: 10/08/10  
Date: 20/07/10

Copies to: DR. WILLIAMS