

SCHEDULE "A"

1. The Defendant, Zak Muscovitch, is a lawyer licensed to practice law in the Province of Ontario.
2. Zak Muscovitch has never been retained by the Plaintiff and has had no personal or professional contact with the Plaintiff whatsoever, other than this Small Claims Court action.
3. The Defendant, Cathy Muscovitch, is the wife of Zak Muscovitch, and has never met nor even heard of the Plaintiff.
4. To the extent that the Plaintiff's Claim against the Defendants Zak Muscovitch and Cathy Muscovitch (the "Defendants") is even comprehensible, the Defendants deny each and every allegation against the Defendants in the Plaintiff's Claim and put the Plaintiff to the strict proof thereof.
5. The Defendant, Zak Muscovitch, has never owed any duty of care whatsoever to the Plaintiff.
6. The Defendant, Zak Muscovitch has never filed any materials or stated any facts in the case of *McLeod et al. v. Sinclair*, a matter that is still before the Ontario Superior Court of Justice which the Defendant knew to be false. Such allegations are scurrilous and have no merit whatsoever.
7. In any event, the Plaintiff was not, and is not, even a party to that proceeding and as such not duty of care exists and the Plaintiff lacks any standing whatsoever to bring this Claim, to the extent that it is tort known to law and to the extent that it is a matter within the jurisdiction of the Small Claims Court, which is denied.
8. The Defendant, Zak Muscovitch, has never "become part of a scheme to defraud and spread falsehoods into the general marketplace for the artwork of Norval Morrisseau" as alleged and has no knowledge of the alleged "scheme".
9. The Defendant never "through Ritchie Sinclair substantially interfered in the sales process in which a large sale of a piece of Norval Morrisseau artwork did not go through" as alleged by the Plaintiff and has no knowledge the alleged "interference". Furthermore, the Plaintiff is apparently referring to a sale that apparently he was not even a party to.

10. The Plaintiff makes out no claim known to law as against the Defendant, Cathy Muscovitch, who in any event, denies each and every allegation made against her in the Statement of Claim.
11. Furthermore and in any event, the Plaintiff has suffered no damages even connected to his allegations against either Defendant.
12. The Defendants state and the fact is that the Plaintiff's Claim is nothing more than an attempt to harass innocent and law abiding people and as such out to receive the harshest condemnation possible from the Court for abusing the Court's process and for making wholly untrue, vexatious, frivolous, and wild allegations.
13. The Defendants therefore ask that the Claim be dismissed with costs on a substantial indemnity basis.
14. The Defendant, Zak Muscovitch, also requests that the Claim be stayed while McLeod v. Sinclair remains before the courts.

[Faint, illegible text from a form, likely a court document or affidavit, including fields for name, address, and contact information.]