**October 23, 2025** – Closed session was held with topic:" Legal Advice regarding Possibility of Initiating a Judicial Review of the City of Barrie Proposed Boundary Adjustment" as directed at the previous meeting. Loopstra presented the opinion to Council, with the direction to make the opinion public. Upon rising from closed session, Council provided further direction to Loopstra, as follows:

> That Council hereby engage with Loopstra Nixon LLP to provide detailed advice regarding the legislative authority of the Minister to Implement the Barrie Annexation Proposal

**November 5, 2025-** Closed session was held with topic: "Legal Advice regarding the Legislative Authority of the Minister to Implement the Barrie Annexation Proposal" as directed at the previous meeting. Loopstra Nixon presented the opinion to Council and Council directed that the opinion be made public.

November 5, 2025 Regular meeting of Council, a report was presented regarding the City of Barrie Proposed Boundary Adjustment, as deferred from the October 15th meeting. The motion listed on the agenda for consideration is as follows:

> C440-2025
>
> That the report from Township Senior Staff regarding the City of Barrie Final Boundary Adjustment Proposal, dated October 15, 2025, be received; and,
>
> Option 1
>
> That Council for the Township of Springwater accepts the City of Barrie's Boundary Adjustment proposal as presented and inform the Minister of Municipal Affairs and Housing of its decision; and,
>
> That a by-law be presented at the November 5, 2025 regular meeting of Council for consideration.
>
> or
>
> Option 2
>
> That Council for the Township of Springwater rejects the City of Barrie's Boundary Adjustment Proposal as presented and inform the Minister of Municipal Affairs and Housing of its decision.

Councillor Moore advised she had a motion without notice that she wished to introduce. As a motion was already on the table, a deferral of the above noted motion was required in order to introduce a new motion. Council supported this request and granted the deferral. Procedurally, a motion to suspend procedures was required and was supported by Council. Councillor Moore's motion was tabled and ultimately supported by Council. The motion is listed below:

> C443-2025
>
> That the Minister be requested to review and consider the Map on Schedule A to the Boundary Adjustment Agreement with the City of Barrie, delineating the lands to be annexed from Springwater is modified to reflect those parcels (S1,S2,S3) shown on the map

from the County of Simcoe CO 2025-297 Schedule 3 (shown at the Special Meeting of County Council on November 4, 2025); and,

That the MZO Lands in the Bayfield corridor are serviced by Springwater and the Framework Agreement be modified to remove the reference to cross border servicing found in section 1.3 and 6.4; and,

That the Minister of Municipal Housing and Affairs be informed of its decision.

The deferred motion was then put back on the table. Due to the outcome of C443-2025, staff advised that option 1 of the deferred motion (to approve the boundary adjustment agreement) was no longer appropriate as it was in direct conflict to C443-2025 (which approved alternative mapping and no cross-border servicing). Council voted in favour of option 2, to reject the framework agreement, as outlined below:

C444-2025

That the report from Township Senior Staff regarding the City of Barrie Final Boundary Adjustment Proposal, dated October 15, 2025, be received; and,

That Council for the Township of Springwater rejects the City of Barrie's Boundary Adjustment Proposal as presented and inform the Minister of Municipal Affairs and Housing of its decision.

At this time, Mayor Coughlin introduced a by-law, under the authority of Strong Mayors Powers, to approve the framework agreement and authorize its execution. A copy of the by-law was sent by the Mayor to the Clerk and members of Council, as required. Upon confirming that the by-law was delivered, the Mayor read the title of the by-law, her reasons for bringing it forward and advised that it would be amended to include a clause "notwithstanding any previous decisions of Council". The motion to approve the by-law, along with a link to the by-law are listed below:

C445-2025

That the mayor's by-law to authorize the Mayor and Clerk to execute the boundary adjustment/restructuring proposal between the Township of Springwater and the City of Barrie, as presented be signed and sealed by the Mayor and Clerk, as amended to add the following clause "Notwithstanding any previous resolutions regarding the Barrie Boundary Discussions, this by-law shall take precedence".

2025-093 (November 5, 2025) Authorize the Mayor and Clerk to execute the boundary adjustment/restructuring proposal between the Township of Springwater and the City of Barrie.

The matter was debated, and the by-law was passed by 1/3 majority. Clause 4 of by-law 2025-093 states "Notwithstanding any previous resolutions regarding the Barrie Boundary Discussions, this by-law shall take precedence". Due to this clause, C443-2025 and C444-2025 are deemed superseded, rendering the decision of authorizing the execution of the boundary adjustment/restructuring proposal as the standing direction on the matter.

Councillor Fisher advised he had a motion without notice that he wished to introduce. As Council had previously waived procedure, he was able to introduce his motion regarding commencing of

various legal proceedings. After debate, this motion was supported by Council. The motion is outlined below:

> C446-2025
>
> That Council direct Loopstra Nixon LLP to challenge the validity of the impugned by-law and provide a broad range of authority to the solicitor to take any and all courses of legal action that, in the opinion of the solicitor, are required to have the matter resolved, including for example an application to the courts to quash the impugned by-law on the basis of illegality or an application for judicial review; and,
>
> That Council direct Loopstra Nixon LLP to seek an injunction to restrain the municipality (and any other party) from acting upon the impugned by-law unless and until the matter is determined by the courts and/or to take any and all courses of legal action that, in the opinion of the solicitor, are required to prevent any further action taken upon the by-law unless and until the matter above is determined by the courts.

On November 7, 2025, Mayor Coughlin issued Mayoral Decision MD-2025-005 A decision to Veto a by-law passed by Council – By-law 2025-091, in part as it applies to Resolution C446-2025

**November 7, 2025 @ 12:15 PM, the Deputy CAO advised Loopstra Nixon of the above noted veto. A response was received from Loopstra Nixon on November 7, 2025 at 3:14PM, which was forwarded to all members of Council. This email can be found as Attachment 1.**

**November 8, 2025,** Mayor Coughlin issued Mayoral Direction MDIR-2025-005 To Direct Township staff to Engage Legal Counsel and Provide Notice to Loopstra Nixon LLP

**On November 8, 2025 at 10:54 AM, the Deputy CAO advised Loopstra Nixon of the above noted Mayoral Direction providing notice to Loopstra Nixon LLP confirming cessation of its engagement effective 12:15 p.m. (EST) on November 7, 2025, directing the firm to cease all work immediately, and clarifying that the Township of Springwater will not be responsible for any costs incurred on or after that time. This email can be found as Attachment 2. ***EMAIL NOT PROVIDED TO MEMBERS OF COUNCIL**

On November 10, 2025, a petition of a majority of members of Council was submitted to the Clerk, calling for a Special Meeting of Council to be held on November 10, 2025, at 6:30 p.m. The agenda topic requested was: Discussion re Use of Strong Mayor Powers relating to the Barrie Boundary Adjustment matter including Dismissal of Loopstra Nixon LLP and Superseding of Council Direction. The agenda can be found here.

Council discussed the noted matter. Through discussion, Councillor Fisher tabled a motion to retain legal to commence legal proceedings relating to the use of Strong Mayor Powers regarding the City of Barrie Boundary Adjustment matter. The Mayor called the motion out of order. Subsequently, Councill tabled a motion to temporarily suspend procedures in order to retable the motion in question, which was supported by Council. Councillor Fisher's motion was tabled and ultimately supported by Council. The motion is listed below:

> C452-2025

WHEREAS on May 7, 2025, the Mayor of the Township of Springwater exercised the Strong Mayor Powers and By-law 2025-042 was passed authorizing the Mayor to engage in discussions with the City of Barrie and the Province of Ontario with respect to the City of Barrie's Boundary Proposal;

AND WHEREAS on September 3, 2025, the Mayor of the Township of Springwater exercised the Strong Mayor Powers and By-law 2025-068 was passed authorizing the Mayor to include cross-border servicing for the Bayfield Street corridor in the discussions with the City of Barrie and the Province of Ontario regarding the City of Barrie's Boundary Proposal;

AND WHEREAS the Township of Springwater Council authorized the retainer of Loopstra Nixon LLP at the Regular Meeting of Council on May 21, 2025 by Resolution C245-2025 in respect of the City of Barrie Boundary Proposal;

AND WHEREAS the Township of Springwater Council authorized Loopstra Nixon LLP to challenge the validity of By-law 2025-093, a By-law to authorize the Mayor and Clerk to execute the boundary adjustment/restructuring proposal between the Township of Springwater and the City of Barrie (the "Impugned By-law"), by Resolution dated November 5, 2025, and provided a broad range of authority to the solicitor to take any and all courses of legal action that, in the opinion of the solicitor, are required to have the matter resolved, including for example an application to the courts to quash the Impugned By-law on the basis of illegality or an application for judicial review;

AND WHEREAS the Township of Springwater Council further authorized Loopstra Nixon LLP to seek an injunction to restrain the municipality, and any other party, from acting upon the Impugned By-law unless and until the matter is determined by the Courts and/or to take any and all courses of legal action that, in the opinion of the solicitor, are required to prevent any further action taken upon the Impugned By-law unless and until the matter is determined by the Courts;

AND WHEREAS the Mayor of the Township of Springwater purported to veto Confirmatory By-law 2025-091, in an attempt to veto Resolution dated November 5, 2025;

AND WHEREAS the veto is of no force or effect because the direction of Council was by Resolution dated November 5, 2025, and the Mayor can only veto by-laws in accordance with section 284.11 of the Municipal Act, 2001, S.O. 2001 c. 25;

AND WHEREAS the Mayor issued Mayoral Direction MDIR-2025-005 on November 8, 2025, purporting to direct Staff to issue written notice to Loopstra Nixon LLP confirming cessation of its engagement effective 12:15p.m. on November 7, 2025, directing the firm to cease all work immediately, and clarifying that the Township of Springwater will not be responsible for any costs incurred by Loopstra Nixon LLP on or after that time;

AND WHEREAS Mayor Direction MDIR-2025-005 is of no force or effect because Loopstra Nixon LLP was retained by Council, and not the Mayor;

AND WHEREAS the Mayor is acting to completely stop Council from taking any actions, including getting legal advice or having matters in dispute determined by the Court;

AND WHEREAS there is a dispute about the legality and validity of the Mayor's acts and whose acts are valid, the Mayor's or Council's;

AND WHEREAS the underlying acts the Mayor and Council are in dispute about are material and fundamental and go to the essence of the Township, the very composition of the Township and what lands are in the Township;

AND WHEREAS the Mayor is taking all steps possible to not have any of these issues determined by the Court, or any independent body;

AND WHEREAS the determination of who can validly and legally act on behalf of the Township, in issues fundamental to the Township, where there is a dispute about who can act, is a matter connected to the good government of the municipality;

NOW THEREFORE BE IT RESOLVED THAT:

1. Council of the Township of Springwater hereby confirms that Loopstra Nixon LLP was retained on May 21, 2025, and remains retained to represent the Township of Springwater in all matters relating to the City of Barrie Boundary Proposal and associated proceedings, including the judicial inquiry provided for in paragraph 6. Council further confirms and, to the extent necessary, reappoints Loopstra Nixon LLP to continue carrying out the directions set out in all Council resolutions, notwithstanding any purported Mayoral Directions to the contrary;

2. The Mayor's Strong Mayor By-laws are of no effect because they do not carry out the provincial priorities and because the inclusion of employment lands and the absence of a direct connection to residential development in the Township renders the proposal outside the scope of these priorities.

3. The veto of Confirmatory By-law 2025-091 and Mayoral Direction MDIR-2025-005 are of no force and effect, because:

a. Resolution dated November 5 2025, which authorized the engagement of Loopstra Nixon LLP and the scope of legal action to be undertaken, was passed by Council and does not constitute a by-law subject to veto under section 284.11 of the Municipal Act, 2001.

b. The Mayor's authority to veto is limited to by-laws that, in the Mayor's opinion, interfere with prescribed provincial priorities, and does not extend to resolutions or decisions regarding the retention of external legal counsel.

c. The issuance of Mayoral Direction MDIR-2025-005 purporting to terminate the engagement of Loopstra Nixon LLP is ultra vires the Mayor's authority under Part VI.1 of the Municipal Act, 2001, S.O. 2001, c. 25, as the power to retain and direct external legal counsel resides with Council and not the Mayor.

4. Council's previous directions to Loopstra Nixon LLP with respect to challenging the validity of the Impugned By-law and providing a broad range of authority to the lawyer to take any and all courses of legal action that, in the opinion of the lawyer, are required to have the matter resolved, including for example an application to the courts to quash the Impugned By-law on the basis of illegality or an application for judicial review, and to seek

an injunction to restrain the municipality, and any other party, from acting upon the Impugned By-law unless and until the matter is determined by the Courts and/or to take any and all courses of legal action that, in the opinion of the lawyer, are required to prevent any further action taken upon the Impugned By-law unless and until the matter above is determined by the Courts, stands, and for further clarification, the direction includes that the Township do the following, unless the lawyer determines that only one or none shall occur:

a. Bringing an application to quash the Impugned By-law forthwith pursuant to section 273(1) of the Municipal Act, 2001, S.O. 2001, c. 25;

b. Seeking a statutory injunction pursuant to section 273(4) of the Municipal Act, 2001, S.O. 2001, c. 25 to prevent anything being done under the Impugned By-law until the application is disposed of.

5. That a judge of the Superior Court of Justice is hereby requested to conduct an inquiry pursuant to section 274(1) of the Municipal Act, 2001, S.O. 2001, c. 25, into a matter connected with the good government of the municipality, and in particular the following questions related to the proper exercise of powers by the head of Council under Part VI.1 of the Municipal Act, 2001, S.O. 2001, c. 25:

a. What practices and procedures should the Township adopt to resolve disputes between a majority of Council and the Mayor about the appropriate use of the Mayor's powers under Part VI.1 of the Municipal Act, 2001, S.O. 2001, c. 25?

b. What process should the Township follow to resolve the following specific questions related to the good government of the municipality:

i. Was the Mayor's exercise of her powers under Part VI.1 of the Municipal Act, 2001, S.O. 2001, c. 25 to facilitate the passage of By-laws 2025-042, 2025-068, and 2025-093 valid?

ii. Was the Mayor's exercise of her powers under Part VI.1 of the Municipal Act, 2001, S.O. 2001, c. 25 to attempt to veto Resolution dated November 5, 2025 valid? Does the Mayor's veto of Confirmatory By-law 2025-091 have any legal effect on Resolution dated November 5, 2025?

iii. Was Mayoral direction MDIR-2025-005 issued pursuant to section 284.3 of Part VI.1 of the Municipal Act, 2001, S.O. 2001, c. 25 to attempt to end the retainer of the Township's external legal counsel, Loopstra Nixon LLP, and prevent it from carrying out Council's direction given through Resolution dated November 5, 2025 valid?

c. If the Justice is of the opinion that the following questions are properly within the scope of the inquiry:

i. Was the Mayor's exercise of her powers under Part VI.1 of the Municipal Act, 2001, S.O. 2001, c. 25 to facilitate the passage of By-laws 2025-042, 2025-068, and 2025-093 valid?

ii. Was the Mayor's exercise of her powers under Part VI.1 of the Municipal Act, 2001, S.O. 2001, c. 25 to attempt to veto Resolution dated November 5, 2025 valid? Does the Mayor's

veto of Confirmatory By-law 2025-091 have any legal effect on Resolution dated November 5, 2025?

iii. Was Mayoral direction MDIR-2025-005 issued pursuant to section 284.3 of Part VI.1 of the Municipal Act, 2001, S.O. 2001, c. 25 to attempt to end the retainer of the Township's external legal counsel, Loopstra Nixon LLP, and prevent it from carrying out Council's direction given through Resolution dated November 5, 2025 valid?

iv. Was it appropriate for the Mayor to attempt to shield use of her powers under Part VI.1 of the Municipal Act, 2001, S.O. 2001, c. 25 from judicial review and oversight by a majority of Council?

v. If the Justice determines that these questions are not properly within the scope of the inquiry, how can they be judicially determined, including the procedural route for doing so both at the Township and in the courts?

d. How should municipalities act in the future when similar issues arise in connection with the use or alleged misuse of powers under Part VI.1 of the Municipal Act, 2001, S.O. 2001, c. 25

**November 10, 2025 at 9:02 PM the CAO and Deputy CAO were included in an email from Loopstra Nixon, addressed to the The Honourable Chief Justice Geoffrey B. Morawetz, with a request to appoint a Judicial Inquiry. This email was forwarded to all members of Council. This email can be found as Attachment 3.**

November 12, 2025, Mayor Coughlin issued Mayoral Decision MD-2025-006 A decision to Veto a by-law passed by Council – By-law 2025-095, in part as it applies to Resolution C452-2025

November 12, 2025, Council convened a Special Meeting to discuss the 2026/27 Mayor's Proposed Budget. Once budget deliberations were complete, and prior to the tabling of the confirmatory by-law, Councillor Alexander tabled a motion to temporarily waive the procedure by-law to introduce a motion without notice, which was supported by Council. Councillor Alexander then tabled the following motion, which was supported by Council.

> C458-2025
>
> Whereas on 2 occasions, the Mayor has purported to veto council decisions on November 05/25 and November 10/2025; and,
>
> Whereas the Mayors veto – veto's the confirming by-law of the two meetings where Council passed resolutions C446-2025 and C452-2025 which are not by-laws; and,
>
> Whereas the Mayors veto did not have the effect of vetoing the resolutions (C446 & C452) the resolutions stand; and,
>
> Now Therefore Be It Resolved That the official position of Springwater Council remains and continues to be:
>
> A) Springwater Council opposes the Barrie framework proposal but supports the Moore motion of Nov 05/2025
>
> B) Springwater will proceed with the court actions to quash the Mayors Strong Mayors Bylaws and proceed with the judicial inquiry
>
> C) Loopstra Nixon continues to be Council for the Township of Springwater despite MD2025-005 and MD2025-006
>
> D) And that the provincial facilitator and Ministry of Municipal Affairs and Housing be advised of the foregoing

At the same meeting of November 12, 2025, Councillor Garwood tabled the following motion, which was supported by Council:

> C459-2025
>
> That Council hereby directs that a chronology of events/decisions, along with all legal correspondence/opinions received, that have taken place since November 5, 2025, along

with any decisions/uses of strong mayors powers used since May 1, 2025, regarding the Barrie Boundary Adjustment matter be sent to the Minister of Municipal Affairs and Housing advising the Township has exhausted procedural advice and legal resources on the matter, seeking guidance and advice from the Province.

November 13, 2025, Mayor Coughlin issued Mayoral Decision MD-2025-007 to Veto a by-law passed by Council – By-law 2025-094, in part as it applies to Resolution C458-2025.

**November 13, 2025, Deputy CAO was cc'd on an email from Loopstra Nixon at 1:57 PM with a screen shot of an email. This email can be found as Attachment 4. ******EMAIL NOT PROVIDED TO MEMBERS OF COUNCIL**

**November 19, 202, Staff and Council members were sent an email from Loopstra Nixon at 4:32 PM, which included a letter addressed to Council, a letter to the Chief Justice and a letter from Affleck, Greene, McMurtry. This email and letters can be found as Attachment 5. This correspondence is labelled privileged and has not been made public by Council.**

**November 21, 2025, Loopstra Nixon corresponded with Township staff at 6:32 PM to provide a letter from the Superior Court of Justice advising of their decision re the Judicial Inquiry request. This email was forwarded to all members of Council. This email can be found as Attachment 6.**

**November 28, 2025 – Loopstra Nixon sent an email to staff at 12:19 PM re Bill 76. This email was forwarded to all members of Council. This email can be found as Attachment 7.**

December 3, 2025, Invoice sent from Loopstra Nixon to Township EA with date ranges November 3-26, 2025. Invoice sent from EA to Mayor with cc to CAO and Deputy CAO. This email and invoice can be found as Attachment 8.

## Renee Ainsworth

**From:** Renee Ainsworth
**Sent:** November 7, 2025 3:48 PM
**To:** Council Members
**Cc:** Quinto M. Annibale; Stacey Forfar
**Subject:** Fw: Additional Direction from Council

Good afternoon Council,

I am forwarding the below email for your information, as requested by Mr. Annibale.

Thank you,

Renee

Get Outlook for Android

---

**From:** Quinto M. Annibale <QAnnibale@loonix.com>
**Sent:** Friday, November 7, 2025 3:14:42 p.m.
**To:** Renee Ainsworth <Renee.Ainsworth@springwater.ca>
**Cc:** Stacey Forfar <stacey.forfar@springwater.ca>; Roberta Green <rgreen@LN.Law>; Christopher Lee <clee@LN.Law>
**Subject:** Re: Additional Direction from Council

**EXTERNAL EMAIL. Please check sender.**

Hi Renee

Thanks for your note. In my opinion, the Mayor's veto does not have the effect of overriding the council resolution. The veto vetoes the confirming bylaw and the confirming by-law merely confirms the actions taken by council at the meeting. As you know, the actions were authorized by resolution of council not a bylaw, so while the confirming by-law confirmed the resolution, I don't believe the veto of the confirming bylaw affects the resolution at all. The resolution still stands and unless and until a court deals with the matter stating that court application(s) can only be commenced by bylaw (a debatable point in my opinion as the common law is mixed on the point), then the resolution continues to have effect. I say this notwithstanding section 5 of the Municipal Act

In addition to that, Section 274 of the Municipal Act clearly does allow the municipality to request the court to conduct an inquiry. The section also clearly allows that to occur by resolution, in which case, it is quite clear to me that the mayors veto does not have the effect of overriding the resolution. Section 5 contains an exception (where powers are specifically otherwise authorized by the Municipal Act or any other Act). The request for a judicial inquiry would include as its relief, a finding by way of recommendation, that all of the actions authorized by council (judicial review, injunction, application to

quash) are properly brought in the circumstances. A positive finding in the s274 application would provide the necessary legal authority to proceed with the section 273 motion to quash and the other relief sought in my view. The council resolution is drafted broadly enough to authorize a section 274 application.

Therefore I am proceeding on the basis that the applications are still authorized by council and we will be drafting and issuing the various proceedings as quickly as possible. It is open to the Mayor and others to oppose those applications or to bring personal actions challenging them.

I would be most appreciative if you could forward this email to all members of council and that you copy me on that correspondence. Kindly confirm once you have done this.

Regards

**Quinto M. Annibale***, Partner
Municipal, Land Use Planning & Development
T. 416.748.4757 | C. 416.917.5563 | QAnnibale@loonix.com

* Quinto M. Annibale Professional Corporation

Loopstra Nixon LLP
This email may contain confidential information which may be protected by legal privilege. If you are not the intended recipient, please immediately notify us by email or by telephone, delete this email and destroy any copies.

---

**From:** Renee Ainsworth <Renee.Ainsworth@springwater.ca>
**Date:** Friday, November 7, 2025 at 12:15 PM
**To:** Quinto M. Annibale <QAnnibale@loonix.com>
**Cc:** Stacey Forfar <stacey.forfar@springwater.ca>
**Subject:** RE: Additional Direction from Council

Good afternoon Quinto,

Mayor Coughlin has vetoed the resolution from Council directing your firm to commence various legal proceedings related to the COB matter. A copy of the veto is attached for your information. As such, I will cancel our meeting on Monday afternoon as no further action is necessary.

Thank you,

Renée Ainsworth, Dipl. M.A., AOMC
Deputy Chief Administrative Officer/
Director of Corporate Services
Township of Springwater
2231 Nursery Road
Minesing, ON L9X 1A8
P. 705-728-4784 Ext. 2026
F. 705-728-6957

***Respecting Your Right to Disconnect: My working hours may not reflect yours. Please do not feel obligated to answer outside your normal work hours.***

The information contained in this message is directed in confidence solely to the person(s) named above and may not be otherwise distributed, copied, or disclosed. The message may contain information that is privileged, confidential and exempt from disclosure under the *Municipal Freedom of Information and Protection of Privacy Act*. If you have received this message in error, please notify the sender of the error so that we can update our distribution list and then delete the message without making a copy.

---

**From:** Quinto M. Annibale <QAnnibale@loonix.com>
**Sent:** November 6, 2025 12:09 AM
**To:** Renee Ainsworth <Renee.Ainsworth@springwater.ca>
**Cc:** Stacey Forfar <stacey.forfar@springwater.ca>; Renee Ainsworth <Renee.Ainsworth@springwater.ca>
**Subject:** Re: Additional Direction from Council

**EXTERNAL EMAIL. Please check sender.**

Hi Renee

Thanks for the follow up. Could we do Monday around 100 pm?

Quinto

> On Nov 6, 2025, at 3:58 AM, Renee Ainsworth <Renee.Ainsworth@springwater.ca> wrote:
>
> Good evening Quinto,
>
> At this evening's meeting, the COB boundary matter was brought before Council. After much discussion and debate, the following resolutions were passed:
>
> 1. That the Minister be requested to review and consider the Map on Schedule A to the Boundary Adjustment Agreement with the City of Barrie, delineating the lands to be annexed from Springwater is modified to reflect those parcels (S1,S2,S3) shown on the map from the County of Simcoe CO 2025-297 Schedule 3 (shown at the Special Meeting of County Council on November 4, 2025); and,
>
>    That the MZO Lands in the Bayfield corridor are serviced by Springwater and the Framework Agreement be modified to remove the reference to cross border servicing found in section 1.3 and 6.4; and,
>
>    That the Minister of Municipal Housing and Affairs be informed of its decision.
>
> 2. That the report from Township Senior Staff regarding the City of Barrie Final Boundary Adjustment Proposal, dated October 15, 2025, be received; and,
>
>    That Council for the Township of Springwater rejects the City of Barrie's Boundary Adjustment Proposal as presented and inform the Minister of Municipal Affairs and Housing of its decision.

Once those resolutions were dealt with, the Mayor tabled a by-law under strong Mayors powers to enter into agreement with the COB for the framework agreement, not withstanding any previous decisions of Council. This by-law was passed with 1/3 support. I will send over a copy of that by-law tomorrow.

Upon resolution of that by-law, Council then tabled and passed the below motion, providing direction to Loopstra Nixon, as follows:

1. That Council direct Loopsta Nixon LLP to challenge the validity of the impugned by-law and provide a broad range of authority to the solicitor to take any and all courses of legal action that, in the opinion of the solicitor, are required to have the matter resolved, including for example an application to the courts to quash the impugned by-law on the basis of illegality or an application for judicial review; and,

   That Council direct Loopstra Nixon LLP to seek an injunction to restrain the municipality (and any other party) from acting upon the impugned by-law unless and until the matter is determined by the courts and/or to take any and all courses of legal action that, in the opinion of the solicitor, are required to prevent any further action taken upon the by-law unless and until the matter above is determined by the courts.

A lot to digest, but if you are available for a zoom call to meet with both myself and CAO Forfar in the next day or two, it would be appreciated.

Thank you,

Renée Ainsworth, Dipl. M.A., AOMC
Deputy Chief Administrative Officer/
Director of Corporate Services
Township of Springwater
2231 Nursery Road
Minesing, ON  L9X 1A8
P. 705-728-4784 Ext. 2026
F. 705-728-6957
<image002.png>
<image001.png>
<image003.png>
<image004.png>
<image005.png>
<image006.png>
<image007.png>

***Respecting Your Right to Disconnect: My working hours may not reflect yours. Please do not feel obligated to answer outside your normal work hours.***

The information contained in this message is directed in confidence solely to the person(s) named above and may not be otherwise distributed, copied, or disclosed. The message may contain information that is privileged, confidential and exempt from disclosure under the *Municipal Freedom of Information*

*and Protection of Privacy Act*. If you have received this message in error, please notify the sender of the error so that we can update our distribution list and then delete the message without making a copy.

**Quinto M. Annibale***, Partner
Municipal, Land Use Planning & Development
T. 416.748.4757 | C. 416.917.5563 | QAnnibale@loonix.com

* Quinto M. Annibale Professional Corporation

LOOPSTRA NIXON

100 New Park Place, Suite 303, Vaughan, Ontario L4K 0H9 | www.LN.Law
*Consistently Ranked as One of the Top Development Law Firms in the GTHA by Novae Res Urbis.*

Loopstra Nixon LLP
This email may contain confidential information which may be protected by legal privilege. If you are not the intended recipient, please immediately notify us by email or by telephone, delete this email and destroy any copies.

LawExchange INTERNATIONAL

## Renee Ainsworth

**From:** Renee Ainsworth
**Sent:** November 8, 2025 10:55 AM
**To:** Quinto M. Annibale
**Cc:** Renee Ainsworth; Stacey Forfar
**Subject:** MDIR-2025-005 Direct Staff to Engage Legal Counsel and Provide Notice to Loopstra Nixon LLP
**Attachments:** MDIR-2025-005 Direct Staff to Engage Legal Counsel and Provide Notice to Loopstra Nixon LLP Signed.pdf

Good morning,

Mayor Coughlin has issued Mayoral Direction MDIR-2025-005 Direct Staff to Engage Legal Counsel and Provide Notice to Loopstra Nixon LLP, which is attached for your information.

The direction provides, in part, that notice be provided to Loopstra Nixon LLP confirming cessation of its engagement effective 12:15 p.m. (EST) on November 7, 2025, directing the firm to cease all work immediately, and clarifying that the Township of Springwater will not be responsible for any costs incurred on or after that time. This email will serve as notice to your firm, in accordance with the Mayoral direction.

Thank you,

Renée Ainsworth, Dipl. M.A., AOMC
Deputy Chief Administrative Officer/ Director
of Corporate Services
Township of Springwater
2231 Nursery Road
Minesing, ON L9X 1A8
P. 705-728-4784 Ext. 2026
F. 705-728-6957

***Respecting Your Right to Disconnect: My working hours may not reflect yours. Please do not feel obligated to answer outside your normal work hours.***

The information contained in this message is directed in confidence solely to the person(s) named above and may not be otherwise distributed, copied, or disclosed. The message may contain information that is privileged, confidential and exempt from disclosure under the *Municipal Freedom of Information and Protection of Privacy Act*. If you have received this message in error, please notify the sender of the error so that we can update our distribution list and then delete the message without making a copy.

## Renee Ainsworth

**From:** Renee Ainsworth
**Sent:** November 11, 2025 2:59 PM
**To:** Council Members
**Cc:** Stacey Forfar
**Subject:** FW: Request from Springwater that a Judge Shall Inquire into matters per Municipal Act, 2001, s. 274
**Attachments:** Letter to the Honourable Chief Justice, dated November 10, 2025.pdf

**Importance:** High

Good afternoon Council,

Please see the attached correspondence from Loopstra Nixon received last evening at 9:02PM, for your information.

Thank you,

Renée Ainsworth, Dipl. M.A., AOMC
Deputy Chief Administrative Officer/ Director
of Corporate Services
Township of Springwater
2231 Nursery Road
Minesing, ON L9X 1A8
P. 705-728-4784 Ext. 2026
F. 705-728-6957

***Respecting Your Right to Disconnect: My working hours may not reflect yours. Please do not feel obligated to answer outside your normal work hours.***

The information contained in this message is directed in confidence solely to the person(s) named above and may not be otherwise distributed, copied, or disclosed. The message may contain information that is privileged, confidential and exempt from disclosure under the *Municipal Freedom of Information and Protection of Privacy Act*. If you have received this message in error, please notify the sender of the error so that we can update our distribution list and then delete the message without making a copy.

---

**From:** Jonathan Plender <jplender@LN.Law>
**Sent:** November 10, 2025 9:02 PM
**To:** michele.livingston@ontario.ca
**Cc:** Quinto M. Annibale <QAnnibale@loonix.com>; Christopher Lee <clee@LN.Law>; Stacey Forfar <stacey.forfar@springwater.ca>; Renee Ainsworth <Renee.Ainsworth@springwater.ca>
**Subject:** Request from Springwater that a Judge Shall Inquire into matters per Municipal Act, 2001, s. 274
**Importance:** High

**EXTERNAL EMAIL. Please check sender.**

Dear Ms. Livingston,

We are writing to you in your capacity as judicial assistant to the Honourable Chief Justice Geoffrey Morawetz.

We represent the Corporation of the Township of Springwater.

Today, Council of the Township passed a resolution requesting a judge of the Superior Court of Justice investigate and inquire into certain matters under section 274 of the *Municipal Act, 2001*. We understand the typical process for an inquiry of this matter is for the municipality to write a letter to the Chief Justice of the Superior Court of Justice of Ontario. Attached is this letter which encloses a copy of the resolution.

We would greatly appreciate it if you could forward this to His Honour.

Please do not hesitate to contact us if we may be of further assistance to His Honour or the Court.

Your very truly,

**Jonathan Plender**, Associate
Commercial Litigation
T. 416.746.5644 | F. 416.746.8319 | jplender@LN.Law

LOOPSTRA NIXON

135 Queens Plate Drive, Suite 600, Toronto, Ontario M9W 6V7 | www.LN.Law

Loopstra Nixon LLP
This email may contain confidential information which may be protected by legal privilege. If you are not the intended recipient, please immediately notify us by email or by telephone, delete this email and destroy any copies.

LawExchange INTERNATIONAL

**Renee Ainsworth**

---

**From:** Quinto M. Annibale <QAnnibale@loonix.com>
**Sent:** November 13, 2025 1:57 PM
**To:** Alexandra Whyte; Brendan P. Ruddick; Christopher Lee; Amanda Pilieci; Jonathan Plender; Roberta Green; Renee Ainsworth
**Subject:** Re: We need a strong response.

**EXTERNAL EMAIL. Please check sender.**

Also passed last night

To: Phil Fisher >

# Motion

Motion Without Notice

Whereas on 2 occasions, the Mayor has purported to veto council decisions on
November 05/25 and November 10/2025
Whereas the Mayors veto – veto's the confirming by-law of the two meetings where
Council passed resolutions C446-2025 and C452-2025 which are not ByLaws
Whereas the Mayors veto did not have the effect of vetoing the resolutions (C446 &
C452) the resolutions stand
Now therefore be it resolved that the official position of Springwater Council remains
and continues to be
A) Springwater Council opposes the Barrie framework proposal but supports the
Moore motion of Nov 05/2025
B) Springwater will proceed with the court actions to quash the Mayors Strong
Mayors Bylaws and proceed with the judicial inquiry
C) Loopstra Nixon continues to be Council for the Township of Springwater despite
MD2025-005 and MD2025-006
D) And that the provincial facilitator and Ministry of Municipal Affairs and Housing be advised of the foregoing

On Nov 13, 2025, at 12:49 PM, Quinto M. Annibale <QAnnibale@loonix.com> wrote:

These were distributed to counsel last night.

**Quinto M. Annibale***, Partner
Municipal, Land Use Planning & Development
T. 416.748.4757 | C. 416.917.5563 | QAnnibale@loonix.com

* Quinto M. Annibale Professional Corporation

Loopstra Nixon LLP
This email may contain confidential information which may be protected by legal privilege. If you are not the intended recipient, please immediately notify us by email or by telephone, delete this email and destroy any copies.

## Renee Ainsworth

**From:** Roberta Green <rgreen@LN.Law>
**Sent:** November 19, 2025 4:32 PM
**To:** Clerk's Department; Council Members; Renee Ainsworth
**Cc:** Quinto M. Annibale; Brendan P. Ruddick
**Subject:** Confidential Update to Council; Application to Quash By-laws 2025-42, 2025-068 and 2025-093; Request for Judicial Investigation pursuant to section 274 of the Municipal Act, 2001, S.O. 2001, c.25
**Attachments:** Confidential Correspondence from Q Annibale dated November 19 2025 1 1.pdf; Letter to the Honourable Chief Justice dated November 14 2025.pdf; 2025 11 17 - Letter from M. Binetti re Corporation of the Township of Springwater.pdf

**EXTERNAL EMAIL. Please check sender.**

Good afternoon,

Please find attached confidential correspondence from Mr. Annibale dated November 19, 2025.

Thank you,

**Roberta Green**, Senior Law Clerk
Municipal, Land Use Planning & Development
T. 416.748.4137 | rgreen@LN.Law

LOOPSTRA NIXON
100 New Park Place, Suite 303, Vaughan, Ontario L4K 0H9 | www.LN.Law
*Consistently Ranked as One of the Top Development Law Firms in the GTHA by Novae Res Urbis.*

Loopstra Nixon LLP
This email may contain confidential information which may be protected by legal privilege. If you are not the intended recipient, please immediately notify us by email or by telephone, delete this email and destroy any copies.

LawExchange INTERNATIONAL

**THIS CONFIDENTIAL CORRESPONDENCE IS SUBJECT TO SOLICITOR AND CLIENT PRIVILEGE WHICH SHOULD NOT BE DISTRIBUTED TO ANY THIRD PARTY.**

**Quinto M. Annibale***
***Quinto M. Annibale Professional Corporation**
Direct Line: (416) 748-4757
e-mail address: qannibale@loonix.com

**VIA EMAIL** (clerks@springwater.ca)

November 19, 2025

Township of Springwater
2231 Nursery Road
Minesing, ON L9X 1A8

Attention: Stacey Forfar, Clerk

Dear Mayor Coughlin and Members of Council:

**RE: Update to Council**
**Application to Quash By-laws 2025-42, 2025-068, and 2025-093**
**Request for Judicial Investigation pursuant to section 274 of the *Municipal Act,* 2001, S.O. 2001, c. 25**
**Our File No. 33222-0002**

I am writing to provide an update to Council on the current status of the application to quash By-laws 2025-042, 2025-068, and 2025-093 filed in accordance with Council Resolutions C446-2025 and C452-2025 and the request for a judicial inquiry brought in accordance with Council's direction provided through Council Resolution C452-2025.

For your reference, the latest correspondence sent by our office to the Chief Justice of the Ontario Superior Court of Justice dated November 12, 2025 on behalf of the Township is enclosed herewith. Also enclosed for your reference is correspondence from Affleck Greene McMurtry LLP dated November 17, 2025 ("AGM Correspondence").

We disagree with the assertion in the AGM Correspondence that Loopstra Nixon LLP no longer acts for the Township. We also disagree with the conclusions in the AGM Correspondence regarding the legal effect of the decisions by Mayor Coughlin to veto portions of Confirming By-laws 2025-091, 2025-095 and 2025-094. In light of Council's direction provided to Loopstra Nixon through Resolution C446-2025 and C452-2025, which direction was confirmed at the November 12, 2025 meeting through resolution C458-2025, we consider ourselves to still be retained by the Township with respect to these matters.

The application to quash continues to be filed with the Court and we will be moving forward with a motion for an injunction shortly in accordance with Council's direction.

We are waiting for a response from the Chief Justice regarding the request for a judicial inquiry and will update Council as soon as we receive more information and confirmation regarding next steps.

Please do not hesitate to contact the undersigned should you require anything further.

Yours truly,

**LOOPSTRA NIXON LLP**

[redacted]

Per: Quinto M. Annibale

LOOPSTRA NIXON LLP
BARRISTERS AND SOLICITORS

**Christopher Lee**
Tel: (416) 748-5117
Email: CLee@LN.Law

**SENT BY EMAIL (michele.livingston@ontario.ca)**

November 14, 2025

The Honourable Chief Justice Geoffrey B. Morawetz
Chief Justice of the Superior Court of Justice
130 Queen Street West
Toronto, ON
M5H 2N5

Dear Chief Justice Morawetz,

**RE: Corporation of the Township of Springwater – Request to Appoint a Judicial Inquiry**

We are writing to you further to our letter dated November 10, 2025, and with respect to the letter written to you by Affleck Greene McMurtry LLP ("AGM"), dated November 12, 2025 ("AGM Letter").

Our office just became aware of the existence of the AGM Letter as of today's date, as we were not copied on, nor did AGM separately provide us with a copy of the AGM Letter, despite Rule 1.09 to the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194 providing that no party's lawyer shall communicate about pending proceedings with a judge out-of-court, unless: (1) all the parties consent to the out-of-court communication; or (2) the court directs otherwise. While, in circumstances like this, communications by letter are unavoidable, the other parties should at least be copied.

Nonetheless, we strongly disagree with the conclusions of AGM contained in the AGM Letter. The fact is that Resolution C452-2025 was validly passed by majority vote of the Township of Springwater's Council members. To be clear, Section 284.11 of the *Municipal Act, 2001*, S.O. 2001, c. 25 ("*Act*") grants Mayor Coughlin the authority to veto By-laws, or parts thereof, if she is of the opinion that such By-law could potentially interfere with a prescribed provincial priority, however, it does not extend such authority to vetoing freestanding Resolutions.

Thus, while Mayor Coughlin purported to exercise her veto power to veto confirmatory By-law 2025-095 ("Confirming By-law"), this does not affect the validity of Resolution C452-2025, which is freestanding, does not rely on the Confirming By-law for its validity and which separately and correctly requests that a judge of the Superior Court of Justice conduct a judicial inquiry.

Further, any purported veto by Mayor Coughlin is not valid because in the circumstances, it does not advance any prescribed provincial priority, as required by the *Act*. Resolution C452-2025 concerns the good government of the Township of Springwater, and not the building of 1.5 million new residential units by December 31, 2031 or infrastructure to support housing.

Even if Mayor Coughlin's veto of Resolution C452-2025 is valid, which is strongly contested, these very actions form the basis of and demonstrate the need for a judicial inquiry for the purposes articulated in Section 274(1)(b) of the *Act*, (i.e., a matter connected with the good government of the municipality).

In fact, at a Council meeting on November 12, 2025, another Resolution was passed confirming Council's position that, among other things: (1) it rejects Mayor Coughlin's use of her Strong Mayor Powers to veto Resolution C452-2025; (2) it requests that a judge of the Superior Court of Justice conduct a judicial inquiry; and, (3) that Loopstra Nixon LLP continues to be counsel for the Township of Springwater ("November 12 Resolution").

In our view, the Resolutions passed by the Township, that a judge shall conduct an inquiry, are valid. However, if that needs to be determined, it is clear that question must be answered. Mayor Coughlin has taken every act possible to prevent this Court from considering the questions contained in Resolution C452-2025 answered, however, the facts demonstrate that they must be answered for the good government of the municipality, and that not answering them goes against it.

We look forward to hearing from you.

Yours very truly,

**LOOPSTRA NIXON LLP**
Per:

[redacted]

Christopher Lee

Encl./ls

c. Stacey Forfar, *Chief Administrative Officer for the Township of Springwater*
Renee Ainsworth, *Deputy Chief Administrative Officer for the Township of Springwater*
Quinto Annibale, *Loopstra Nixon LLP*
Michael I. Binetti, *Affleck Greene McMurtry LLP Barristers*

# SCHEDULE 1 – Statutes and Regulations:

## *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194

### Communications out of Court

**1.09** When a proceeding is pending before the court, no party to the proceeding and no party's lawyer shall communicate about the proceeding with a judge or associate judge out of court, directly or indirectly, unless,

(a) all the parties consent, in advance, to the out-of-court communication; or

(b) the court directs otherwise.

## *Municipal Act, 2001*, S.O. 2001, c. 25

### Investigation by judge

**274** (1) If a municipality so requests by resolution, a judge of the Superior Court of Justice shall,

(a) investigate any supposed breach of trust or other misconduct of a member of council, an employee of the municipality or a person having a contract with the municipality in relation to the duties or obligations of that person to the municipality;

(b) inquire into any matter connected with the good government of the municipality; or

(c) inquire into the conduct of any part of the public business of the municipality, including business conducted by a commission appointed by the council or elected by the electors. 2001, c. 25, s. 274 (1).

### Veto powers

#### Application

**284.11** (1) This section applies with respect to by-laws under,

(a) this Act and the regulations, other than under any prescribed section;

(b) the *Planning Act* and its regulations, other than any prescribed section; and

(c) any other prescribed Act or regulation or prescribed section of an Act or regulation. 2022, c. 18, Sched. 2, s. 1.

**By-law for consideration**

(2) Despite any procedure by-law passed by the municipality under subsection 238 (2) and subject to subsection (3) of this section, if the head of council is of the opinion that all or part of a by-law that is subject to this section could potentially interfere with a prescribed provincial priority, the head of council may provide written notice to the council of the intent to consider vetoing the by-law.

## O. Reg. 580/22: PROVINCIAL PRIORITIES

### Provincial priorities

**1.** The following are provincial priorities prescribed for the purposes of sections 284.10, 284.11 and 284.11.1 of the Act:

1. Building 1.5 million new residential units by December 31, 2031.
2. Constructing and maintaining infrastructure to support housing, including,
    i. transit,
    ii. roads,
    iii. utilities, and
    iv. servicing.

**RESOLUTION OF**
**THE COUNCIL OF THE TOWNSHIP OF SPRINGWATER**

**WHEREAS** on May 7, 2025, the Mayor of the Township of Springwater exercised the Strong Mayor Powers and By-law 2025-042 was passed authorizing the Mayor to engage in discussions with the City of Barrie and the Province of Ontario with respect to the City of Barrie's Boundary Proposal;

**AND WHEREAS** on September 3, 2025, the Mayor of the Township of Springwater exercised the Strong Mayor Powers and By-law 2025-068 was passed authorizing the Mayor to include cross-border servicing for the Bayfield Street corridor in the discussions with the City of Barrie and the Province of Ontario regarding the City of Barrie's Boundary Proposal;

**AND WHEREAS** the Township of Springwater Council authorized the retainer of Loopstra Nixon LLP at the Regular Meeting of Council on May 21, 2025 by Resolution C245-2025 in respect of the City of Barrie Boundary Proposal;

**AND WHEREAS** the Township of Springwater Council authorized Loopstra Nixon LLP to challenge the validity of By-law 2025-093, a By-law to authorize the Mayor and Clerk to execute the boundary adjustment/restructuring proposal between the Township of Springwater and the City of Barrie (the "Impugned By-law"), by Resolution dated November 5, 2025, and provided a broad range of authority to the solicitor to take any and all courses of legal action that, in the opinion of the solicitor, are required to have the matter resolved, including for example an application to the courts to quash the Impugned By-law on the basis of illegality or an application for judicial review;

**AND WHEREAS** the Township of Springwater Council further authorized Loopstra Nixon LLP to seek an injunction to restrain the municipality, and any other party, from acting upon the Impugned By-law unless and until the matter is determined by the Courts and/or to take any and all courses of legal action that, in the opinion of the solicitor, are required to prevent any further action taken upon the Impugned By-law unless and until the matter is determined by the Courts;

**AND WHEREAS** the Mayor of the Township of Springwater purported to veto Confirmatory By-law 2025-091, in an attempt to veto Resolution dated November 5, 2025;

**AND WHEREAS** the veto is of no force or effect because the direction of Council was by Resolution dated November 5, 2025, and the Mayor can only veto by-laws in accordance with section 284.11 of the *Municipal Act, 2001,* S.O. 2001 c. 25;

**AND WHEREAS** the Mayor issued Mayoral Direction MDIR-2025-005 on November 8, 2025, purporting to direct Staff to issue written notice to Loopstra Nixon LLP confirming cessation of its engagement effective 12:15p.m. on November 7, 2025, directing the firm to cease all work immediately, and clarifying that the Township of Springwater will not be responsible for any costs incurred by Loopstra Nixon LLP on or after that time;

**AND WHEREAS** Mayor Direction MDIR-2025-005 is of no force or effect because Loopstra Nixon LLP was retained by Council, and not the Mayor;

**AND WHEREAS** the Mayor is acting to completely stop Council from taking any actions, including getting legal advice or having matters in dispute determined by the Court;

**AND WHEREAS** there is a dispute about the legality and validity of the Mayor's acts and whose acts are valid, the Mayor's or Council's;

**AND WHEREAS** the underlying acts the Mayor and Council are in dispute about are material and fundamental and go to the essence of the Township, the very composition of the Township and what lands are in the Township;

**AND WHEREAS** the Mayor is taking all steps possible to not have any of these issues determined by the Court, or any independent body;

**AND WHEREAS** the determination of who can validly and legally act on behalf of the Township, in issues fundamental to the Township, where there is a dispute about who can act, is a matter connected to the good government of the municipality;

**NOW THEREFORE BE IT RESOLVED THAT:**

1. Council of the Township of Springwater hereby confirms that Loopstra Nixon LLP was retained on May 21, 2025, and remains retained to represent the Township of Springwater in all matters relating to the City of Barrie Boundary Proposal and associated proceedings, including the judicial inquiry provided for in paragraph 6. Council further confirms and, to the extent necessary, reappoints Loopstra Nixon LLP to continue carrying out the directions set out in all Council resolutions, notwithstanding any purported Mayoral Directions to the contrary;

2. The Mayor's Strong Mayor By-laws are of no effect because they do not carry out the provincial priorities and because the inclusion of employment lands and the absence of a direct connection to residential development in the Township renders the proposal outside the scope of these priorities.

3. The veto of Confirmatory By-law 2025-091 and Mayoral Direction MDIR-2025-005 are of no force and effect, because:

    a. Resolution dated November 5 2025, which authorized the engagement of Loopstra Nixon LLP and the scope of legal action to be undertaken, was passed by Council and does not constitute a by-law subject to veto under section 284.11 of the Municipal Act, 2001.

    b. The Mayor's authority to veto is limited to by-laws that, in the Mayor's opinion, interfere with prescribed provincial priorities, and does not extend to resolutions or decisions regarding the retention of external legal counsel.

    c. The issuance of Mayoral Direction MDIR-2025-005 purporting to terminate the engagement of Loopstra Nixon LLP is ultra vires the Mayor's authority under Part VI.1 of the *Municipal Act, 2001*, S.O. 2001, c. 25, as the power to retain and direct external legal counsel resides with Council and not the Mayor.

4. Council's previous directions to Loopstra Nixon LLP with respect to challenging the validity of the Impugned By-law and providing a broad range of authority to the lawyer to take any and all courses of legal action that, in the opinion of the lawyer, are required to have the matter resolved, including for example an application to the courts to quash the Impugned By-law on the basis of illegality or an application for judicial review, and to seek an injunction to restrain the municipality, and any other party, from acting upon the

Impugned By-law unless and until the matter is determined by the Courts and/or to take any and all courses of legal action that, in the opinion of the lawyer, are required to prevent any further action taken upon the Impugned By-law unless and until the matter above is determined by the Courts, stands, and for further clarification, the direction includes that the Township do the following, unless the lawyer determines that only one or none shall occur:

a. Bringing an application to quash the Impugned By-law forthwith pursuant to section 273(1) of the *Municipal Act, 2001,* S.O. 2001, c. 25;

b. Seeking a statutory injunction pursuant to section 273(4) of the *Municipal Act, 2001,* S.O. 2001, c. 25 to prevent anything being done under the Impugned By-law until the application is disposed of.

5. That a judge of the Superior Court of Justice is hereby requested to conduct an inquiry pursuant to section 274(1) of the *Municipal Act, 2001,* S.O. 2001, c. 25, into a matter connected with the good government of the municipality, and in particular the following questions related to the proper exercise of powers by the head of Council under Part VI.1 of the *Municipal Act, 2001,* S.O. 2001, c. 25:

   a. What practices and procedures should the Township adopt to resolve disputes between a majority of Council and the Mayor about the appropriate use of the Mayor's powers under Part VI.1 of the *Municipal Act, 2001,* S.O. 2001, c. 25?

   b. What process should the Township follow to resolve the following specific questions related to the good government of the municipality:

      i. Was the Mayor's exercise of her powers under Part VI.1 of the *Municipal Act, 2001,* S.O. 2001, c. 25 to facilitate the passage of By-laws 2025-042, 2025-068, and 2025-093 valid?

      ii. Was the Mayor's exercise of her powers under Part VI.1 of the *Municipal Act, 2001,* S.O. 2001, c. 25 to attempt to veto Resolution dated November 5, 2025 valid? Does the Mayor's veto of Confirmatory By-law 2025-091 have any legal effect on Resolution dated November 5, 2025?

      iii. Was Mayoral direction MDIR-2024-005 issued pursuant to section 284.3 of Part VI.1 of the *Municipal Act, 2001,* S.O. 2001, c. 25 to attempt to end the retainer of the Township's external legal counsel, Loopstra Nixon LLP, and prevent it from carrying out Council's direction given through Resolution dated November 5, 2025 valid?

   c. If the Justice is of the opinion that the following questions are properly within the scope of the inquiry:

      i. Was the Mayor's exercise of her powers under Part VI.1 of the *Municipal Act, 2001,* S.O. 2001, c. 25 to facilitate the passage of By-laws 2025-042, 2025-068, and 2025-093 valid?

      ii. Was the Mayor's exercise of her powers under Part VI.1 of the *Municipal Act, 2001,* S.O. 2001, c. 25 to attempt to veto Resolution dated November

5, 2025 valid? Does the Mayor's veto of Confirmatory By-law 2025-091 have any legal effect on Resolution dated November 5, 2025?

iii. Was Mayoral direction MDIR-2024-005 issued pursuant to section 284.3 of Part VI.1 of the *Municipal Act, 2001,* S.O. 2001, c. 25 to attempt to end the retainer of the Township's external legal counsel, Loopstra Nixon LLP, and prevent it from carrying out Council's direction given through Resolution dated November 5, 2025 valid?

iv. Was it appropriate for the Mayor to attempt to shield use of her powers under Part VI.1 of the *Municipal Act, 2001,* S.O. 2001, c. 25 from judicial review and oversight by a majority of Council?

v. If the Justice determines that these questions are not properly within the scope of the inquiry, how can they be judicially determined, including the procedural route for doing so both at the Township and in the courts?

d. How should municipalities act in the future when similar issues arise in connection with the use or alleged misuse of powers under Part VI.1 of the *Municipal Act, 2001,* S.O. 2001, c. 25?

Whereas on 2 occasions, the Mayor has purported to veto council decisions on
November 05/25 and November 10/2025
Whereas the Mayors veto – veto's the confirming by-law of the two meetings where
Council passed resolutions C446-2025 and C452-2025 which are not ByLaws
Whereas the Mayors veto did not have the effect of vetoing the resolutions (C446 &
C452) the resolutions stand
Now therefore be it resolved that the official position of Springwater Council remains
and continues to be
A) Springwater Council opposes the Barrie framework proposal but supports the
Moore motion of Nov 05/2025
B) Springwater will proceed with the court actions to quash the Mayors Strong
Mayors Bylaws and proceed with the judicial inquiry
C) Loopstra Nixon continues to be Council for the Township of Springwater despite
MD2025-005 and MD2025-006
D) And that the provincial facilitator and Ministry of Municipal Affairs and Housing be advised of the foregoing

AFFLECK GREENE MCMURTRY LLP
BARRISTERS

**Michael I. Binetti**
**Email: mbinetti@agmlawyers.com**
**Direct Line: (416) 360-0777**

November 17, 2025

By EMAIL
michele.livingston@ontario.ca

**The Honourable Chief Justice Geoffrey B. Morawetz**
Chief Justice of the Superior Court of Justice
130 Queen Street West
Toronto, Ontario, M5H 2N5

Dear Chief Justice Morawetz:

**Re: The Corporation of the Township of Springwater ("Springwater") – Judicial Inquiry Request**

We write further to the letter sent to Your Honour by Loopstra Nixon LLP on November 14. Springwater does not acknowledge that Loopstra Nixon acts for it.

The part of the by-law on which Loopstra Nixon relied in its last letter was also vetoed by Mayor Coughlin the day before, on November 13 (see attached, "Mayoral Decision 2025-007 to Veto By-law 2025-094, in part, as it applies to resolution C458-2025"). It too is of no force and effect.

We do not believe it is appropriate to litigate this issue by correspondence. Nothing prevents any interested individual from instituting court proceedings for what is, in essence, a challenge to Mayor Coughlin's use of her powers under the *Municipal Act, 2001*.

Finally, I apologize to counsel at Loopstra Nixon LLP (and the Court) for not providing them with a courtesy copy of our previous correspondence. This was through my inadvertence alone.

Sincerely,
**Affleck Greene McMurtry LLP**



**Michael I. Binetti**

Encl.

*cc.* Stacey Forfar, Chief Administrative Officer for the Township of Springwater
Renee Ainsworth, Deputy Chief Administrative Officer for the Township of Springwater
William McLennan, Affleck Greene McMurtry LLP
Christopher Lee, Loopstra Nixon LLP
Quinto Annibale, Loopstra Nixon LLP

# Mayoral Decision

## MD-2025-007

## A decision to Veto a by-law passed by Council – By-law 2025-094, in part as it applies to Resolution C458-2025

Whereas the Mayor has the authority to exercise certain powers under Part VI.1 (Special Powers and Duties of Head of Council) of the Municipal Act, 2001 ("Act"); and

Whereas section 284.11 of the Act provides that if the head of council is of the opinion that all or part of a by-law could potentially interfere with a prescribed provincial priority, the head of council may veto the by-law; and

Whereas the Province has prescribed provincial priorities by making O. Reg. 580/22: Provincial Priorities pursuant to section 284.9 of the Act; and

Whereas the Mayor of the Township of Springwater deems it desirable to exercise decision-making power under the Act; and

Whereas on November 5, 2025, the Mayor exercised their authority under section 284.11.1 of the Act to propose a by-law to Council to authorize the execution and delivery of an agreement related to the boundary adjustment/restructuring proposal between the Township and the City of Barrie based on their opinion that the by-law could potentially advance a provincial priority, and Council enacted By-law 2025-093 in accordance with subsection 284.11.1(4) of the Act and to take primacy over any other resolutions; and

Whereas on November 7, 2025, the Mayor issued Mayoral Decision 2025-005 to Veto By-law 2025-091, in part, as it applies to resolution C446-2025 that purported to direct Loopstra Nixon LLP to commence legal proceedings challenging the use of the Mayor's exercise of powers under Part VI.1 of the Act in relation to the boundary adjustment/restructuring proposal, which in the opinion of the Mayor could potentially interfere with the provincial priorities set out section 1 of O. Reg. 580/22; and,

Whereas on November 12, 2025, the Mayor issued Mayoral Decision 2025-006 to Veto By-law 2025-095, in part, as it applies to resolution C452-2025 that purported to direct Loopstra Nixon LLP to commence legal proceedings challenging the use of the Mayor's exercise of powers under Part VI.1 of the Act in relation to the boundary adjustment/restructuring proposal, which in the opinion of the Mayor could potentially interfere with the provincial priorities set out section 1 of O. Reg. 580/22; and,

Whereas the Mayor reaffirms their opinion on the matter.

Now therefore the Mayor of the Township of Springwater hereby exercises the authority pursuant to subsection 284.11(5) of the Act to veto the following by-law passed by Council on November 12, 2025 as follows:

1. That By-law 2025-094, being a by-law to confirm the proceedings of the Township of Springwater at its meeting held on November 12, 2025 be vetoed, in part, as it applies to resolution C458-2025 to oppose the City of Barrie Boundary Adjustment proposal and to direct Loopstra Nixon LLP to proceed with legal proceedings, despite previous Mayoral Directions (hereinafter referred to as the "**By-law**").

2. That all other aspects of By-law 2025-094 shall be deemed to have been approved in writing pursuant to subclause 284.11(4)(a)(i) of the Act on November 13, 2025.

The reasons for the veto are as follows:

I, Jennifer Coughlin, Mayor of the Township of Springwater am of the opinion that the By-law could potentially interfere with the provincial priorities set out in section 1 of O. Reg. 580/22.

In particular, Council's decision to continue to challenge the exercise of powers under Part VI.1 of the Act seeking to potentially advance provincial priorities, to obtain injunctive relief in relation thereto and to request a judicial inquiry respecting the lawful and good faith exercise of said powers constitutes a potential interference with prescribed provincial priorities.

**This mayoral decision shall come into effect this 13th day of November, 2025.**

[redacted]

Jennifer Coughlin,
Mayor

## Renee Ainsworth

**From:** Renee Ainsworth
**Sent:** November 24, 2025 4:39 PM
**To:** Council Members
**Cc:** Stacey Forfar
**Subject:** FW: Judicial inquiry request
**Attachments:** LET - ELO to Lee and Binetti - re Springwater - Nov. 21, 2025.pdf

Good afternoon,

Please see the below email and attachment, for information.

Thank you,

Renée Ainsworth, Dipl. M.A., AOMC
Deputy Chief Administrative Officer/ Director of Corporate Services
Township of Springwater
2231 Nursery Road
Minesing, ON L9X 1A8
P. 705-728-4784 Ext. 2026
F. 705-728-6957

***Respecting Your Right to Disconnect: My working hours may not reflect yours. Please do not feel obligated to answer outside your normal work hours.***

The information contained in this message is directed in confidence solely to the person(s) named above and may not be otherwise distributed, copied, or disclosed. The message may contain information that is privileged, confidential and exempt from disclosure under the *Municipal Freedom of Information and Protection of Privacy Act*. If you have received this message in error, please notify the sender of the error so that we can update our distribution list and then delete the message without making a copy.

---

**From:** Quinto M. Annibale <QAnnibale@loonix.com>
**Sent:** November 21, 2025 6:32 PM
**To:** Renee Ainsworth <Renee.Ainsworth@springwater.ca>; Roberta Green <rgreen@LN.Law>; Stacey Forfar <stacey.forfar@springwater.ca>; Jennifer Marshall <jennifer.marshall@springwater.ca>; Christopher Lee <clee@LN.Law>; Brendan P. Ruddick <bruddick@LN.Law>
**Subject:** Judicial inquiry request

**EXTERNAL EMAIL. Please check sender.**

Renee and Jennifer

Attached you will please find a letter from the Office of the Chief Justice, which is self explanatory. We will not be pursuing this relief further unless council can provide an unambiguous resolution. A resolution of council which the mayor does not attempt to veto would be an example of such an unambiguous resolution.

I would appreciate it if you would forward this correspondence to all council members.

Regards

Quinto Annibale

**Quinto M. Annibale***, Partner
Municipal, Land Use Planning & Development
T. 416.748.4757 | C. 416.917.5563 | QAnnibale@loonix.com

* Quinto M. Annibale Professional Corporation

LOOPSTRA NIXON

100 New Park Place, Suite 303, Vaughan, Ontario L4K 0H9 | www.LN.Law
*Consistently Ranked as One of the Top Development Law Firms in the GTHA by Novae Res Urbis.*

Loopstra Nixon LLP
This email may contain confidential information which may be protected by legal privilege. If you are not the intended recipient, please immediately notify us by email or by telephone, delete this email and destroy any copies.

LawExchange INTERNATIONAL

SUPERIOR COURT OF JUSTICE
OFFICE OF THE CHIEF JUSTICE

ONTARIO

COUR SUPÉRIEURE DE JUSTICE
BUREAU DU JUGE EN CHEF

OSGOODE HALL
TORONTO, ONTARIO M5H 2N5

November 21, 2025

Christopher Lee
Loopstra Nixon LLP
Woodbine Place
#600-135 Queens Plate Drive
Toronto, Ontario
M9W 6V7

*Sent via Email:* clee@ln.law

Michael Binetti
Affleck Greene McMurtry LLP
#200-365 Bay Street
Toronto, Ontario
M5H 2V1

*Sent via Email:* mbinetti@agmlawyers.com

Dear Mr. Lee and Mr. Binetti,

I am the Executive Legal Officer for the Ontario Superior Court of Justice. Your correspondence to Chief Justice Morawetz, dated Nov. 10, 2025, Nov. 12, 2025, Nov. 14, 2025, and Nov. 17, 2025, has been forwarded to me.

I am writing to advise that Chief Justice Morawetz will not consider the request to exercise his duty to appoint a judge to conduct an inquiry pursuant to Section 274 of the *Municipal Act, 2002, S.O. 2001, c.* 25, unless the parties consent to such an appointment, or until further clarity is brought to the situation by due process of law or by an unambiguously valid resolution of the Council.

Sincerely,

*Corie Langdon*

Corie Langdon
Executive Legal Officer

## Renee Ainsworth

**From:** Renee Ainsworth
**Sent:** November 28, 2025 3:40 PM
**To:** Council Members
**Cc:** Stacey Forfar; Renee Ainsworth
**Subject:** FW: Bill 76
**Attachments:** b076_e[33].pdf

Good afternoon,

Please see the below email for information.

Thank you,

Renée Ainsworth, Dipl. M.A., AOMC
Deputy Chief Administrative Officer/ Director of Corporate Services
Township of Springwater
2231 Nursery Road
Minesing, ON L9X 1A8
P. 705-728-4784 Ext. 2026
F. 705-728-6957

***Respecting Your Right to Disconnect: My working hours may not reflect yours. Please do not feel obligated to answer outside your normal work hours.***

The information contained in this message is directed in confidence solely to the person(s) named above and may not be otherwise distributed, copied, or disclosed. The message may contain information that is privileged, confidential and exempt from disclosure under the *Municipal Freedom of Information and Protection of Privacy Act*. If you have received this message in error, please notify the sender of the error so that we can update our distribution list and then delete the message without making a copy.

---

**From:** Quinto M. Annibale <QAnnibale@loonix.com>
**Sent:** November 27, 2025 12:19 PM
**To:** Renee Ainsworth <Renee.Ainsworth@springwater.ca>; Clerk's Department <clerks@springwater.ca>; Stacey Forfar <stacey.forfar@springwater.ca>
**Cc:** Roberta Green <rgreen@LN.Law>; Christopher Lee <clee@LN.Law>; Alexandra Whyte <awhyte@LN.Law>; Brendan P. Ruddick <bruddick@LN.Law>
**Subject:** Bill 76

**EXTERNAL EMAIL. Please check sender.**

Renee

I would appreciate it if you would forward this email to all members of Council at your earliest convenience.

Mayor and Members of Council:

As you know, the legislature on Wednesday November 25, 2025, introduced Bill 76. "Barrie - Oro-Medonte-Springwater Boundary Adjustment Act, 2025 "**An Act respecting the adjustment of the boundaries between the City of Barrie, the Township of Oro-Medonte and the Township of Springwater**". A copy of the proposed legislation is attached for your reference. Bill 76 received second reading yesterday, November 26, 2025. If passed, it is our opinion that the effect of the legislation would be to implement the Barrie annexation proposal by statute, thereby making the relief which you instructed me to seek in the Application to Quash the Mayor's various strong Mayors By-laws and Directions moot. In those circumstances, the relief sought, (although still important as it would determine the reach of a Strong Mayor), would be theoretical only. Courts generally do not make rulings on theoretical or moot points and therefore the likelihood of success would diminish considerably were you to continue with the litigation now. Therefore, I have asked our litigation team to cease work on the Application to Quash as of today so that legal costs are minimized. If the legislation is passed I will likely follow up with a recommendation to council that it authorize me to withdraw the application.

I do note the Bill gives the Minister power to require compensation to be paid and that this may require further negotiation with the province and the other municipalities to determine that compensation (or at the very least, submissions to that effect should be made to the Minister by your council). You will recall that I made certain recommendations on how to improve the compensation last offered by Barrie through the Framework agreement, so that it was more in line with other examples throughout Ontario and fairer for Springwater. If Council wishes, I would be pleased to continue as your counsel and assist in those negotiations or submissions. Kindly advise.

Regards

**Quinto M. Annibale***, Partner
Municipal, Land Use Planning & Development
T. 416.748.4757 | C. 416.917.5563 | QAnnibale@loonix.com

* Quinto M. Annibale Professional Corporation

LOOPSTRA NIXON

100 New Park Place, Suite 303, Vaughan, Ontario L4K 0H9 | www.LN.Law
*Consistently Ranked as One of the Top Development Law Firms in the GTHA by Novae Res Urbis.*

Loopstra Nixon LLP
This email may contain confidential information which may be protected by legal privilege. If you are not the intended recipient, please immediately notify us by email or by telephone, delete this email and destroy any copies.

LawExchange INTERNATIONAL

**Renee Ainsworth**

**From:** Shelley Westlake-Brown
**Sent:** December 3, 2025 7:34 AM
**To:** Jennifer Coughlin
**Cc:** Stacey Forfar; Renee Ainsworth
**Subject:** FW: Loopstra Nixon LLP - 33222-0002 - Statement 185609
**Attachments:** Bill 185609.PDF

FYI – something we chat about when we meet this morning.

Shelley

Shelley Westlake-Brown (She/Her)
Executive Assistant to the Mayor,
Council, Chief Administrative Officer and
Deputy Chief Administrative Officer
Township of Springwater
2231 Nursery Road
Minesing, ON L9X 1A8
P. 705-728-4784 Ext. 2020

***Respecting Your Right to Disconnect: My working hours may not reflect yours. Please do not feel obligated to answer outside your normal work hours.***

The information contained in this message is directed in confidence solely to the person(s) named above and may not be otherwise distributed, copied, or disclosed. The message may contain information that is privileged, confidential and exempt from disclosure under the *Municipal Freedom of Information and Protection of Privacy Act*. If you have received this message in error, please notify the sender of the error so that we can update our distribution list and then delete the message without making a copy.

---

**From:** Accounts Receivable <AR@loonix.com>
**Sent:** December 3, 2025 3:26 AM
**To:** Shelley Westlake-Brown <shelley.westlake-brown@springwater.ca>
**Cc:** Roberta Green <rgreen@LN.Law>
**Subject:** Loopstra Nixon LLP - 33222-0002 - Statement 185609

**EXTERNAL EMAIL. Please check sender.**

Attached please find your statement for services through November 26, 2025.

Payment remittance options can be found on the last page of the statement.

Thank you,

Accounts Receivable
Loopstra Nixon LLP
135 Queens Plate Drive, Suite 600
Toronto, Ontario M9W 6V7

LOOPSTRA NIXON LLP
BARRISTERS AND SOLICITORS

November 30, 2025

**Quinto M. Annibale**
Direct Line: 416.748.4757
Email: qannibale@loonix.com
Quinto M. Annibale Professional Corporation

**CONFIDENTIAL**

Township of Springwater
2231 Nursery Road
Minesing, ON
L9X 1A8

Matter No. 33222-0002

Attention: Renee Ainsworth

RE: Barrie Annexation Discussion

Please find enclosed herewith our Statement of Account for services rendered with regard to the above-noted matter to and including November 26, 2025 which we trust you will find satisfactory.

If you have any questions, please contact the undersigned.

Yours truly,

LOOPSTRA NIXON LLP
Per:

[redacted]
Quinto M. Annibale
Encl.

LOOPSTRA NIXON LLP
BARRISTERS AND SOLICITORS

November 30, 2025

Invoice No. 185609

Matter No. 33222-0002

Township of Springwater
2231 Nursery Road
Minesing, ON
L9X 1A8

Attention: Renee Ainsworth

**RE: Barrie Annexation Discussion**

**STATEMENT OF ACCOUNT**

TO OUR FEE FOR PROFESSIONAL SERVICES rendered in connection with the above-noted matter through to November 26, 2025.

| | |
|---|---|
| OUR FEE | $50,190.50 |
| HST on Fees @ 13% | $6,524.77 |
| **DISBURSEMENTS:** | |
| Total Disbursements | ($1,533.39) |
| HST on Disbursements | ($199.34) |
| **Total Fees, Disbursements and HST** | **$54,982.54** |

The above account represents a summary of the professional services rendered to you, and this firm reserves the right to provide further particulars of our professional services rendered in the event the same is required or requested.

**THIS IS OUR STATEMENT OF ACCOUNT HEREIN**
LOOPSTRA NIXON LLP
Per:



Quinto M. Annibale
QMA/tat

In accordance with the Solicitor's Act, interest will be charged on this account until paid, at the rate of 2.0% per annum, commencing one month after delivery, E. & O.E. * HST No. 122610298RT0001

LOOPSTRA NIXON LLP
BARRISTERS AND SOLICITORS

**PRIVILEGED AND CONFIDENTIAL**
**Billing Detail Report to 26-Nov-2025**

November 30, 2025 Invoice No. 185609

Township of Springwater
2231 Nursery Road
Minesing, ON
L9X 1A8

Matter No. 33222-0002

Attention: Renee Ainsworth

RE: Barrie Annexation Discussion

---

**FEES**

| Date | Narrative | Professional | Time |
|---|---|---|---|
| 03-Nov-2025 | To multiple correspondence and telephone calls with C. Lee and Q. Annibale; To correspondence to client | BXR | [redacted] |
| 03-Nov-2025 | To email from B. Ruddick re: revised draft opinion re: Minister's powers, review same; To email from Q. Annibale | AEW | |
| 04-Nov-2025 | To e-mail to A. Whyte; | QMA | |
| 04-Nov-2025 | To further review of case law re jurisdiction question | BXR | |
| 04-Nov-2025 | To emails w/ Q. Annibale re: binder of legal opinions | AEW | |
| 06-Nov-2025 | To receipt and review of Council direction; To e-mail to the team; To correspondence from R. Ainsworth; | QMA | |
| 06-Nov-2025 | To receipt and review of Council direction; To e-mail to the team; To correspondence from R. Ainsworth; | QMA | |
| 06-Nov-2025 | To correspondence with co-counsel | BXR | |
| 06-Nov-2025 | To emails from Q. Annibale, review correspondence from R. Ainsworth; To email from C. Lee | AEW | |
| 07-Nov-2025 | To correspondence from R. Ainsworth (2 times); To conducting legal research; To attendance at meeting with C. Lee, B. Ruddick and A. Whyte; To correspondence with R. Ainsworth (2 times); To telephone conference with C. Lee re process to be followed; | QMA | |
| 07-Nov-2025 | To e-mail from C. Lee re procedural by-law; To further legal research; | QMA | |

| | | |
|---|---|---|
| 07-Nov-2025 | Call with C.Lee and municipal team re: inquiry under section 274 of the municipal act | AJP |
| 07-Nov-2025 | Review of precedent for judicial inquiry and instructions to J.Plender via Teams. call with J. Plenders and review emails between litigation team | AJP |
| 07-Nov-2025 | To multiple meetings and correspondence re resolution and next steps; To review of veto and staff direction and consideration of legal effect of same; To review of Council resolution; To research and review of precedents and case law; | BXR |
| 07-Nov-2025 | To review Municipal Act re: confirmatory by-laws; To email from Q. Annibale; To mtg w/ Q. Annibale, C. Lee and B. Ruddick; To review Municipal Act re: s. 274 case law; To mtg w/ C. Lee, A. Pillecci, J. Plender and B. Ruddick re: next steps | AEW |
| 07-Nov-2025 | To internal conference with C. Lee re Barrie Annexation Bylaw and preliminary research re same; and To conference call with C. Lee, A. Pilieci, B. Ruddick, and A. Whyte re strategy; and To research regarding S.274 of the Municipal Act and finding precedent municipal judicial inquiries; and To further internal conferences with A. Pilieci and C. Lee re same and strategy; and To internal correspondence with A. Pilieci, Q. Annibale, A. Whyte and B. Ruddick re same. | JOP |
| 08-Nov-2025 | To several telephone conference with the team to discuss next steps; To conducting legal research; To review of all matters; | QMA |
| 08-Nov-2025 | Review file, call and emails with litigation team, and review and revise Notice of Application | AJP |
| 08-Nov-2025 | To multiple correspondence with co-counsel; To review of draft NOA; To review of correspondence from Clerk; To correspondence with Q. Annibale; To telephone call with Q. Annibale | BXR |
| 08-Nov-2025 | To internal conference with C. Lee re file strategy and next steps; and To begin drafting Rules of Procedure for judicial inquiry. | JOP |

[redacted]

| | | |
|---|---|---|
| 08-Nov-2025 | To internal conference with C. Lee re Application to Quash Bylaw strategy; and To draft email to A. Pilieci, B. Ruddick, A. Whyte, C. Lee and Q. Annibale re next steps and strategy; and To draft Notice of Application to Quash Bylaw; and To further internal conferences with A. Pilieci, B. Ruddick, A. Whyte, C. Lee re Application and Resolution strategy; and To making further amendments to same; and To conducting research on the use of Strong Mayor Powers in Ontario. | JOP |
| 09-Nov-2025 | To drafting, engrossing and preparation of resolution of Council; To several telephone conferences with the team; To review of and amendments to the resolution; To telephone conference with Township people; To review of press reports; | QMA |
| 09-Nov-2025 | To e-mail to the team re necessity of a confirming by-law; To e-mail from C. Lee re amendment to 6a; To e-mail to the team re readiness with court filing; | QMA |
| 09-Nov-2025 | To multiple correspondence re draft resolution and next steps; To revisions to resolution; To review and comment on NOA; To multiple meetings and correspondence with co-counsel re same; | BXR |
| 09-Nov-2025 | To correspondences w/ B. Ruddick and Q. Annibale; To drafting resolution, email to B. Ruddick; To edits to draft resolution; To mtg w/ Q. Annibale, C. Lee, J. Plender and B. Ruddick re: draft resolution, next steps; To revisions to draft resolution; To multiple correspondences w/ B. Ruddick, C. Lee and Q. Annibale | AEW |
| 09-Nov-2025 | To continue drafting Notice of Application; and To internal conference with A. Pilieci, B. Ruddick, A. Whyte, C. Lee re draft Notice of Application and draft Resolution; and To revising Notice of Application accordingly. | JOP |
| 10-Nov-2025 | To observing Council meeting; To correspondence with team (2 times); To correspondence from team; | QMA |
| 10-Nov-2025 | To correspondence with the team; To e-mail to B. Ruddick; To telephone conference with B. Ruddick; To e-mail from B. Ruddick; To telephone conference with Councillor; To review of resolution; To review of procedural by-law; | QMA |
| 10-Nov-2025 | To review of judicial proceedings; | QMA |

| | | |
|---|---|---|
| 10-Nov-2025 | Email correspondence with litigation team, further review and revisions to notice of applicaton, meetings with C.Lee and J. Plender, instructions to L.Stark re: letter to chief justice, review of letter to chief justice, calls and correspondence with C.Fotopolous re: issuance of notice of application and further emails to team and virtual attendance of township special meeting | AJP |
| 10-Nov-2025 | To multiple correspondence re Court action, potential request for judicial investigation, and related council resolution; To review of draft correspondence and updated notice of application | BXR |
| 10-Nov-2025 | To TC w/ C. Lee; To multiple correspondences w/ Q. Annibale and B. Ruddick | AEW |
| 10-Nov-2025 | To continue drafting Notice of Application and several revisions to same; and To internal conferences with C. Lee and A. Pilieci re Notice of Application; and To drafting letter to the Honourable Chief Justice Morawetz to initiate the Judicial Inquiry and to revising same; and To draft email to Michele Livingston (judicial assistant to CJ Morawetz) containing the letter. | JOP |
| 10-Nov-2025 | To attendance at the Special Council Meeting - November 10, 2025; and To internal correspondence with A. Whyte, A. Pilieci, and C. Lee re letter to Chief Justice Morawetz; and To internal conference with C. Lee and A. Whyte re amendments to draft Resolution to append to letter to Chief Justice Morawetz; and To appending final amended Resolution to the letter; and To sending letter to M. Livingston (judicial assistant to Justice Morawetz). | JOP |
| 10-Nov-2025 | To discussion with C. Lee. To telephone discussion with M. Livingston. To email communication with A. Pilieci and C. Lee. | LHS |
| 10-Nov-2025 | To call with A. Pilieci; to correspond with A. Pilieci and J. Plender; to file Notice of Application; to send confirmation of Notice of Application; | CMF |
| 11-Nov-2025 | To telephone conference with Councillor; | QMA |
| 11-Nov-2025 | To multiple correspondence re response to letters and next steps | BXR |
| 12-Nov-2025 | To office conference with B. Ruddick; To review of veto; | QMA |
| 12-Nov-2025 | To review of media reports; | QMA |
| 13-Nov-2025 | To e-mail to C. Lee (2 times); To telephone attempt on C. Lee; To e-mail from C. Lee; To office conference with A. Whyte; | QMA |

[redacted]

| | | |
|---|---|---|
| 13-Nov-2025 | To telephone conference with C. Lee; To receipt and review of correspondence from solicitor acting for the Mayor; | QMA |
| 13-Nov-2025 | To correspondence re letters to court and coordinating response to same | BXR |
| 14-Nov-2025 | To review of and amendment to letter; | QMA |
| 14-Nov-2025 | To multiple correspondence re letters to court and next steps | BXR |
| 14-Nov-2025 | To research re: resolutions and by-laws; To drafting letter re: Affleck Green McMurtry LLP letter re: judicial inquiry; To correspondences w/ J. Plender | AEW |
| 14-Nov-2025 | To rr emails from Q. Annibale; and To phone call with C. Lee re response letter to AGM and strategy re same; and To conducting research re Municipal Act, Regulation concerning Provincial Priorities, and operative Rules of Civil Procedure; and To drafting letter to Chief Justice Morawetz and internal correspondence, revising and redrafting same; and To finalizing letter to Chief Justice Morawetz, compiling documents to append and drafting email to Judicial Assistant of CJ Morawetz containing the letter. | JOP |
| 17-Nov-2025 | To research re: resolutions and by-laws, case law review, note to file | AEW |
| 17-Nov-2025 | To rr email from W. McLennan containing letter to CJ Morawetz and to reading same; and To internal conference with A. Pilieci re application strategy and next steps. | JOP |
| 18-Nov-2025 | To telephone conference with C. Lee; | QMA |
| 18-Nov-2025 | To telephone conference with Deputy Mayor; To office conference with B. Ruddick; | QMA |
| 18-Nov-2025 | To office conference with A. Whyte, B. Ruddick and C. Lee; | QMA |
| 18-Nov-2025 | To office conference with Q. Annibale; To review of correspondence to Court; To telephone call with C. Lee | BXR |
| 18-Nov-2025 | To office conference w/ Q. Annibale and B. Ruddick; To review correspondence from M. Binetti | AEW |
| 19-Nov-2025 | To drafting update correspondence to council and direction to R. Green re same; To correspondence with Q. Annibale; To correspondence from R. Green; To begin preparing draft procedural order and correspondence with J. Plender re same | BXR |
| 19-Nov-2025 | To review draft correspondence re: update to Council; To emails w/ B. Ruddick | AEW |

| | | | |
|---|---|---|---|
| 19-Nov-2025 | To internal conference with B. Ruddick re draft order for the Chief Justice re judicial inquiry and to providing a precedent example re same; and To draft email outlining similar orders from judicial inquiries in Ontario. | JOP | [redacted] |
| 20-Nov-2025 | To office conference with B. Ruddick re next steps; | QMA | |
| 20-Nov-2025 | Call with C.Fotopoulos re: notice of application | AJP | |
| 20-Nov-2025 | Review practice directions, email to C.Lee et al re: notice of application, call and emails to K.Fitzner. | AJP | |
| 20-Nov-2025 | To internal correspondence with A. Pilieci re Notice of Application. | JOP | |
| 20-Nov-2025 | To review correspondence from Court; to send correspondence to J. Plender, C. Lee and A. Pilieci; to call with A. Pilieci; | CMF | |
| 20-Nov-2025 | Call with Amanda Pilieci; Review email from Court re NOA and review practice directions; Email to Trial Coordinator re scheduling application date; Call Barrie Trial Coordinators office; | KAF | |
| 21-Nov-2025 | To receipt and review of correspondence from the Chief Judge; To correspondence with Council; | QMA | |
| 21-Nov-2025 | Teams messages with K.Fitzner and email to litigation team re: hearing date for application | AJP | |
| 21-Nov-2025 | Review of email from C.Lee and letter from superior court declining to conduct inquiry | AJP | |
| 21-Nov-2025 | To correspondence re judicial inquiry request; | BXR | |
| 21-Nov-2025 | To call Barrie Trial Coordinator; | KAF | |
| 24-Nov-2025 | To call Barrie Trial Coordinator; To internal correspondence re update; | KAF | |
| 25-Nov-2025 | To telephone conference with Councillor; To office conference with the team; To office conference with A. Whyte; To review of press release; | QMA | |
| 25-Nov-2025 | Teams call with Christopher Lee and J. Plender to discuss application materials | AJP | |
| 25-Nov-2025 | Begin drafting affidavit in support of application to quash by-law | AJP | |
| 25-Nov-2025 | To internal conference with C. Lee and A. Pilieci re application to quash. | JOP | |
| 26-Nov-2025 | To office conference with A. Whyte re boundaries of map; | QMA | |
| 26-Nov-2025 | Further review of client documents and continue drafting affidvait in support of application. | AJP | |
| OUR FEE | | | $50,190.50 |

LOOPSTRA NIXON LLP
BARRISTERS AND SOLICITORS

**Time Summary**

[redacted]

| **DISBURSEMENTS** (E=HST exempt) | Amount |
|---|---|
| LexisNexis Recovery | (293.79) |
| LexisNexis Recovery | (619.80) |
| LexisNexis Recovery | (619.80) |
| Total Disbursements | ($1,533.39) |

LOOPSTRA NIXON LLP
BARRISTERS AND SOLICITORS

Township of Springwater
2231 Nursery Road
Minesing, ON
L9X 1A8

Statement No: 185609

Statement Date: 11/30/2025

**Amount Due: $54,982.54**

Attention: Renee Ainsworth

**33222-0002: Barrie Annexation Discussion**

## PAYMENT OPTIONS

[redacted]