LOOPSTRA NIXON LLP
BARRISTERS AND SOLICITORS

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

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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