



Tribunals Ontario

Licence Appeal Tribunal

15 Grosvenor Street, Ground Floor

Toronto, ON M7A 2G6

Telephone: 416-326-1356

Toll Free: 1-888-444-0240

TTY: 1-800-855-0511

Email: LATregistrar@ontario.ca

Website: tribunalsontario.ca/lat

Summons to a Witness

Disponible en français

Important Information for the Summons Requestor

- To summons a witness to a hearing, you must complete this Summons to a Witness form and submit it to the Licence Appeal Tribunal for signature.
- Incomplete or illegible forms may result in a Summons request being denied.
- [Rule 8](#) can be accessed here.

Tribunal File No.: _____

Appellant Information

Last Name

First Name

Respondent Information

Last Name

First Name

Name of Witness

Last Name

First Name

Witness's Address

Street Number

Street Name

Unit Number

Municipality (City, town)

Province

Postal Code

Describe how this witness's evidence is relevant to the issues in dispute. (*Attach additional pages if you need more space.*)

You are hereby summoned and required to attend before the Licence Appeal Tribunal of Ontario at a hearing on the following dates between 9:30 a.m. to 5:00 p.m.:

From (yyyy/mm/dd): _____ To (yyyy/mm/dd): _____
Time including AM/PM (hh:mm): _____

The hearing is being held in the following format:

☐ Videoconference: Zoom link to follow: _____

☐ In-Person:

Address of Hearing:

Street Number	Street Name	Unit Number
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Municipality (City, town)	Province	Postal Code
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☐ Teleconference:

Teleconference Number: _____ Access Code (if any): _____

You are required to bring with you to the hearing the following documents and things:

If you fail to attend or remain in attendance as this summons requires, the Superior Court of Justice may order that a warrant for your arrest be issued, or that you be punished in the same way as for contempt of court.

Signature of Member on Behalf of the Tribunal

Date issued (yyyy/mm/dd)

Important Information for the Witness Being Summoned

- Subsections 11(1) and (2) of *Statutory Powers Procedure Act*, R.S.O. 1990, c. S.22 as amended provide as follows:

A witness at an oral or electronic hearing is entitled to be advised by a representative as to his or her rights, but such representative may take no other part in the hearing without leave of the Tribunal.

Where an oral hearing is closed to the public, the witness's representative is not entitled to be present except when that witness is giving evidence.
- A Summons to Witness must be served to you personally.
- You are entitled to be paid the same fees or allowances for attending at or otherwise participating in the hearing as are paid to a person summoned to attend before the Superior Court of Justice** (www.attorneygeneral.jus.gov.on.ca).
- If you fail to attend and give evidence at the hearing, or to produce the documents or things specified, at the time and place specified, without lawful excuse, you are liable to punishment by the Superior Court of Justice in the same manner as if for contempt of that court for disobedience to a subpoena. The Superior Court of Justice may also order that a warrant for your arrest be issued.**
- If you require an accommodation to participate in the hearing, including those pursuant to the *Human Rights Code*, please contact the Licence Appeal Tribunal.

This summons was issued at the request of, and inquiries may be directed to, the following:

Name of Requestor

Address:

Street Number	Street Name	Unit Number
Municipality (<i>City, town</i>)		Province
		Postal Code
Telephone Number	Email Address	

The Licence Appeal Tribunal collects the personal information requested on this form under section 3 of the *Licence Appeal Tribunal Act, 1999*. This information will be used to determine appeals under this *Act*. After an appeal is filed, all information may become available to the public. Any questions about this collection may be directed to the Licence Appeal Tribunal at LATRegistrar@ontario.ca or 416-326-1356 or toll-free at 1-888-444-0240.

**Papadimitropoulos, Andrew (“AP”)
Summons
Schedule “A”**

Describe how this witness's evidence is relevant to the issues in dispute. (Attach additional pages if you need more space.)

The witness is defined herein as “AP”. The witness’ evidence is relevant to all of the issues in the dispute as particularized in the Appeal and Purported SNIC Response including any activities that “AP” has engaged in by way of representing Security National Insurance Company and/or providing legal services and/or practising law when the issue of a conflict of interest is a live issue herein.

This motion, and subsequent order issued by LAT on April 9, 2024, calls into question the handling of the *accident benefits file* of this **Appellant** by **SNIC** (also a non-insurer (**TDGIC**)^{i ii} and the “**Legal Staff**” of “**TD Insurance**”ⁱⁱⁱ), due to an **Actual COI**^{iv} or **Perceived COI**, and its *essential character* relates to his claim for accident benefits.^v This motion’s outcome will impact the course of this **SNIC Proceeding** which is why **Appellant** promptly filed.^{vi vii viii ix x}

The Appellant repeats and relies upon his affirmed evidence in the Hearing Record for his Conflict of Interest Motion (also defined as “**NOM #6**”).

You are required to bring with you to the hearing the following documents and things:
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Any and all documents (in draft or final form) or things that are relevant to the evidence of the Applicant or the submissions of the Appellant involving the TD Claim Numbers, TD Claim Number #3, the Insurance Policy and SNIC Proceeding (unless otherwise referenced as being outside that ambit):

1. **Affidavit #1 to #16** of the Applicant with a particular reference:
 - a. Affidavit #3, Exhibit “A”, pages 555 to 557;
 - b. Affidavit #15 of the Applicant; and
 - c. Affidavit #16 of the Applicant;
2. All documents or things that relate to:
 - a. **TD Claim Number:** 035325790 (the “TD Claim Numbers”);
 - b. **TD’s Claim Number 035325790-3** (the “**Claim Number**” or “**TD Claim #3**”);
 - c. TD Insurance Policy Number #001013511806 (the “**Policy Number**” or “**Insurance Policy**”),
 - d. LAT File Number “23-015662/AABS” (the “**LAT File Number**” or “**SNIC Proceeding**”);
3. All documents or things that relate to any privacy or access requests made by the Appellant to TD Bank Group;
4. Any and all documents or things involving any communications (texts, BBM’s, WhatsApp messages, Imessages, emails, faxes, letters, notes to phone conversations) including but not limited to the following individuals and persons:
 - a. The named individuals in paragraph 1 of the April 9, 2024 order;
 - b. Ms. Alisha-Anne Nurse;
 - c. Ms. Carol Persaud;
 - d. Any other claims adjusters who have handled the TD Claims Numbers;
5. Any and all personal information of the Appellant that “AP” has collected, used, accessed or disclosed (including disclosures to organizations, persons or individuals that are not affiliated or associated with TDI) from the time the Appellant was resident in Ontario to present;
6. Any and all documentation relating to marriage, separation and divorce involving Ms. Nicole Artopoulos (the “**Policyholder**” under the “**Insurance Policy**”) with specific reference to any “no contact requirements” and/or no indirect contact with the **Policyholder** after separation (2017) to present;
7. Any and all documentation involving usage of the email of TDIADR@tdinsurance.com;
8. Any and all documentation and things involving interactions, communications, advice, supervision, management, or provision of services involving Mr. Karat involving the above;
9. Any conduct or activities of AP that fall under section 1(7) of the LSA, and corresponding By-Laws of the LSO involving the TD Claim Numbers, the Insurance Policy and SNIC Proceeding;

10. Any and all partnership and association agreements with any of the above named individuals in the order of April 9, 2024 of LAT including any MDP agreements;
11. The name of AP's legal assistant, law clerk or support staff (if any); and
12. Any other documents or things that are relevant to the allegation of an Actual COI or a Perceived COI.

ⁱSee: **HR INDEX**, Tab 3, page 98;

ⁱⁱ[under the Insurance Policy, *Insurance Act* and unnamed in the **Appeal** and **Response** signed by a non-licensee]

ⁱⁱⁱ<https://www.canadianlawlist.com/listingdetail/company/td-insurance-staff-legal-757005/>

^{iv}See: **HR INDEX**, Tab 21, **Affidavit** #15, paragraph 89;

^v(see: *LATA*, section 3(2); *Mansuri*).

^{vi}See: **HR INDEX**, Tab 6, page 141;

^{vii}See: **HR INDEX**, Tab 6, page 140;

^{viii}(see: *Talisman Resort*; *Yellow Cedar*, Tab 6, page 139, paragraph 37).

^{ix}The previous decisions of the Tribunal of Vice Chair Lake spoke to how early in the stage of the proceedings this SNIC Proceeding was.

^xAn applicant, in order to demonstrate *good faith* in advancing a conflict of interest motion is required to bring its motion promptly once there is evidence of a conflict of interest.