

Courts of Justice Act

STATEMENT OF DEFENCE

(General heading)

STATEMENT OF DEFENCE

1. The defendant admits the allegations contained in paragraphs N/A of the statement of claim.
2. The defendant denies the allegations contained in paragraphs #77 through #80 (including) of the statement of claim. (Amended) 18/2/10
3. The defendant has no knowledge in respect of the allegations contained in paragraphs N/A of the statement of claim.
4. *See attached references depicted on separate pages attached therewith.*

March 18th, 2010

*Mr William Smith Manderson
406/689 Woolwich Street
Guelph, Ontario
N1H 3YB
Tel: 519-265-0114
Fax: 519-265-5278*

TO

*McCarthy Tétrault L.L.P.
Box 48, Suite 5300
Toronto Dominion Bank Tower
Toronto, Ontario
M5K 1E6
Christopher A Wayland
Tel: 416-401-8109
Fax: 416-686-0673
LSUC #423810*

And

*Steven Tanner
Tel: 416-601-8193
Fax: 416-686-0673
LSUC #52983W
Counsel to the moving parties*

*Prepared by: Mr. William S. Manderson
18th March, 2010
Signature:*

Courts of Justice Act

NOTICE OF INTENT TO DEFEND

(General heading)

NOTICE OF INTENT TO DEFEND

The defendant William Smith Manderson (unrepresented) intends to defend this action.

March 19, 2010

*Mr William Smith Manderson
406/689 Woolwich Street
Guelph, Ontario
N1H 3YB
Tel: 519-265-0114
Fax: 519-265-5278*

TO

*McCarthy Tétrault L.L.P.
Box 48, Suite 5300
Toronto Dominion Bank Tower
Toronto, Ontario
M5K 1E6
Christopher A Wayland
Tel: 416-401-8109
Fax: 416-686-0673
LSUC #423810*

And

*Steven Tanner
Tel: 416-601-8193
Fax: 416-686-0673
LSUC #52983W
Counsel to the moving parties*

*Prepared by : Mr. William S. Manderson
18th March, 2010
Signature:*

DEFAMATORY LIBEL

SECTION #298/PAGES 619 AND 620 (MARTIN'S)

A DEFAMATORY LIBEL MUST BE PUBLISHED (WITHOUT LAWFUL JUSTIFICATION) INFRINGES THE GUARANTEE TO FREEDOM OF EXPRESSION IN SECTION 2(b) OF THE "CHARTER", PROPERLY INTERPRETED. IT IS VALID AS A REASONABLE LIMIT, UNDER S.1 OF THE CHARTER.

SECTION #309 (PUBLIC BENEFIT)

NO PERSON SHALL BE DEEMED TO PUBLISH A DEFAMATORY LIBEL BY REASON ONLY THAT HE PUBLISHES DEFAMATORY MATTER, THAT, ON REASONABLE GROUNDS, HE BELIEVES IS TRUE, AND THAT IT IS RELEVANT, TO ANY SUBJECT OF PUBLIC INTEREST, THE PUBLIC DISCUSSION FOR WHICH, IS FOR THE PUBLIC BENEFIT.

SECTION 311 WHEN TRUTH IS A DEFENSE

NO PERSON SHALL BE DEEMED TO PUBLISH A DEFAMATORY LIBEL, BY REASON ONLY THAT HE PUBLISHES IN ANSWER TO ENQUIRIES MADE TO HIM, DEFAMATORY MATTER RELATING TO A SUBJECT MATTER IN RESPECT OF WHICH THE PERSON BY WHOM, OR ON WHOSE BEHALF, THE ENQUIRIES ARE MADE, HAS AN INTEREST OF KNOWING THE TRUTH, OR WHO, ON REASONABLE GROUNDS, THE PERSON WHO PUBLISHES THE DEFAMATORY, BELIEVES HAS SUCH AN INTEREST IF:

- A) THE MATTER IS PUBLISHED IN GOOD FAITH, FOR THE PURPOSE OF GIVING INFORMATION IN ANSWER TO THE INQUIRIES.
- B) THE PERSON, WHO PUBLISHES “THE DEFAMATORY” MATTER, BELIEVES THAT IT IS TRUE.
- C) THE DEFAMATORY MATTER IS RELEVANT TO THE ENQUIRIES, AND
- D) THE DEFAMATORY MATTER DOES NOT, IN ANY WAY OR RESPECT, EXCEED WHAT IS REASONABLY SUFFICIENT, IN THE CIRCUMSTANCES –
R.S.C. C-34, S. 277

SECTION 135

PUBLICATION IN GOOD FAITH FOR REDRESS OF WRONG (AS APPLICABLE)

SECTION 131

MISLEADING JUSTICE – REF: CONFLICTING AFFIDAVITS

EVIDENTIARY SUBMISSIONS, ORAL AND WRITTEN

SECTION 119

ATTEMPTED BRIBERY OF AN OFFICIAL – REF: SIGNED AND SEALED STATEMENT OF FORMER MAYOR OF GUELPH/ERAMOSIA, MR. CLINTON MARTIN REF: “LAND DIVISION OPPORTUNITIES” FOR KICKBACKS. ORIGINAL DOCUMENTS WITH MR. DAVID DONEY (LAWYER)

ADDITIONAL SUBMISSION

MAY IT PLEASE THE COURT; I SEEK THE COURT'S INDULGENCE TO PLEASE CONSIDER MY ADDITIONAL REQUESTS IN THE ABSENCE OF LEGAL REPRESENTATION, CAUSED BY MY RECORDED INABILITY TO FINANCIALLY AFFORD THIS SERVICE.

- 1) IF THE INTENT OF THE MOTION IS TO REMOVE THE "STAYED" STATUS FROM JUSTICE HEROLD'S COURT IN MAY 2009, CAN WE PLEASE BE INFORMED.
- 2) IF INDEED THE PLAN IS TO PROCEED, PRIOR TO ANY FORMAL COURT PROCEEDINGS, I WOULD REQUEST A WITHOUT PREJUDICE CASE MEETING, BE CONDUCTED UNDER THE SUPERVISION OF HIS HONOUR, TO ATTEND TO "HOUSEKEEPING ISSUES" INHERITED FROM THE MAY 6TH HEARING BEFORE JUSTICE CAS HEROLD AS OFFICIALLY TRANSCRIPTED AND THE PRODUCTS OF THE CASE MEETING HELD, WITHOUT PREJUDICE AT THAT TIME. I SUBMIT WE WOULD BE RESPONSIBLE TO DO SO, IN LIGHT OF THE HUGE COSTS TO DATE, BEING BORN BY THE TAXPAYERS.

TO THE COURT, I THANK YOU.

WILLIAM SMITH MANDERSON

MARCH 18TH, 2010

SIGNATURE _____