Social Media Evidence in Litigation: Finding It and Using It

Jason Wadden and Sarah Stothart[1]

Goodmans LLP

Barristers & Solicitors / goodmans.ca

Social Media Evidence in Litigation: Finding It and Using It

Social media has created a fundamental shift in how people interact. In Canada, social media usage is particularly prevalent. A 2015 Canadian study indicated that 59% of survey respondents use Facebook, and Facebook's own statistics as of 2013 reveal that 19 million Canadians log onto Facebook at least once a month[2]. Those numbers do not even include the users of other social media platforms, such as Instagram, LinkedIn, Snapchat, blogs, and many others.

These social media platforms represent a new, and potentially powerful, reservoir of evidence lawyers must capture. It is therefore critical that when dealing with a case in which social media evidence might be available, counsel consider how they can find it, and use it, in litigation. The purpose of this guide is to highlight certain issues that must be considered when social media evidence may be relevant to your case.

In Part A of this guide, we set out some considerations for finding social media evidence. In Part B, we identify some issues counsel should consider when using social media in litigation and highlight some examples of cases in which social media evidence was used.

PART A – FINDING SOCIAL MEDIA EVIDENCE

1. Leveraging the Discovery Process

- The primary context in which lawyers will attempt to find social media evidence is the discovery process. The issues related to social media evidence are relevant on two fronts – in obtaining social media evidence from adverse parties and ensuring your client is complying with its own disclosure obligations.
- The starting point, of course, is Rule 30.02 of the *Rules of Civil Procedure*, which provides that each party is required to disclose "every document relevant to any matter in issue in an action that is or has been in the possession, control or power of a party" and to produce such documents unless privilege is claimed. Given the "social" nature of social media, it would be difficult to argue that a social media post is subject to privilege, thus any relevant social media post is likely required to be disclosed.
- In *Leduc v. Roman* ("***Leduc***"), Justice Brown emphasized that the contents of social media accounts are producible:

  > "The *Rules of Civil Procedure* also impose an obligation on a party's counsel to certify that he has explained to the deponent of an affidavit of documents "what kinds of documents are likely to be relevant to the allegations in the pleadings": Rule 30.03(4). Given the pervasive use of Facebook and the large volume of photographs typically posted on Facebook sites, it is now incumbent on a party's counsel to explain to the client, in appropriate cases, that documents posted on the party's Facebook profile may be relevant to allegations made in the pleadings."[3]

- Indeed, courts have not hesitated to order the production of social media accounts. In doing so, they have been guided by the following principles that are helpfully summarized in *Ottenhof v. Ross*:

  i. The pages of a social media account are documents for the purpose of discovery and should be listed in a party's affidavit of documents if relevant.

  ii. The mere existence of a social media account is insufficient to require its production on discovery.

  iii. Whether it is listed in the affidavit of documents or not, the responding party is entitled to cross-examine on the affidavit of documents to determine whether a social media account exists and the relevance of its content, and may seek production of the relevant portions of the account for which privilege is not claimed.

  iv. Access to the party's social media account through the party's password is overly intrusive unless the party is claiming as part of her damages claim a level of disability that inhibits her computer time. In those circumstances, a forensic examination of the social media account may be necessary.[4]

- Accordingly, counsel must ensure that relevant social media posts are included in their clients' own productions, and should also ensure they canvass adverse parties' use and disclosure of social media evidence during examinations for discovery.

2. "Private" Content Is Not Immune From Disclosure

- Many social media platforms allow users to control access to the content they post or send to others. Even though users may believe that such "private" content is

confidential, such information is producible in litigation if it is relevant. The general disclosure requirement under Rule 30.02 requires disclosure of potentially relevant social media documents regardless of whether a person's profile is "public" or "private", just as any other non-public document must be produced in litigation.

- However, if a party fails to disclose social media evidence the other party believes to exist, it can be sought through an order for further production. However, the court may refuse to order disclosure where the documents appear minimally important to the litigation but the invasion of privacy is significant.
- This might present a dilemma to parties: for a court to order production of a document, a court requires evidence, as opposed to mere speculation, that a potentially relevant undisclosed document exists. Yet, a party may be unable to access the social media site to determine whether it contains relevant information.[5]
- *Schuster v. Royal and Sun Alliance Insurance Company of Canada ("**Schuster**")*, an early case dealing with social media evidence, provides an example of this dilemma. In *Schuster*, the insurer defendant sought access to the plaintiff's private Facebook profile. The Court found there was insufficient evidence that relevant information existed in the private pages of the account. The Court stated that, if there had been relevant photos on the public version of the page, that may have indicated there would be photos on the private page as well.[6] However, the Court made an order allowing the defendant to cross-examine the plaintiff on her affidavit of documents to establish the existence of any relevant documents on her private page.
- Today, the hurdle might not be very onerous to pass, particularly as the use of social media becomes more widespread. In *Leduc*, now a leading case on this issue, Justice Brown suggested the court can infer, from the nature of the Facebook service itself, the likely existence of relevant documents on a limited-access Facebook profile. He said:

  > "A party who maintains a private, or limited access, Facebook profile stands in no different position than one who sets up a publicly-available profile. Both are obliged to identify and produce any postings that relate to any matter at issue in an action. … To permit a party claiming very substantial damages for loss of enjoyment of life to hide behind self-set privacy controls on a website, the primary purpose of which is to enable people to share information about how they lead their social lives, risks depriving the opposite party of access to material that may be relevant to ensuring a fair trial."[7]

- In both *Schuster and Leduc*, the Court commented on how parties should use the opportunity of examination for discovery to ask whether the content of private social media pages are relevant to the matters at issue. Doing so may assist counsel in a subsequent motion for access to a party's private social media accounts. In *Leduc*, Justice Brown specifically noted that the evidence needed to justify a production order will typically come from examination for discovery.[8]

3. Obtaining Social Media Content or Account Information From Third Parties

- There may be instances in which the contents of social media accounts, or specific information regarding the accounts, can be obtained from third parties. This might be particularly useful when obtaining such information is necessary to commence an action or the information cannot otherwise be obtained from the adverse parties directly (such as when the user purported to delete the information).
- The Ontario Court of Appeal's decision in *York University v. Bell Canada Enterprises* is instructive when attempting to obtain Norwich Orders (pre-discovery production from third parties) against internet service providers or social media companies to obtain documents to be used in litigation.[9] York University sought a Norwich Order requiring Bell and Rogers to disclose information necessary to obtain the identity of the anonymous author(s) of allegedly defamatory emails and a web posting. The Court of Appeal weighed the following factors and granted the Norwich Order:

  i. whether the applicant has provided evidence sufficient to raise a valid, bona fide or reasonable claim;

  ii. whether the applicant has established the relationship with the third party from whom the information is sought, such that it establishes that the third party is somehow involved in the acts complained of;

  iii. whether the third party is the only practicable source of the information available;

  iv. whether the third party can be indemnified for costs to which the third party may be exposed because of the disclosure; and

v. whether the interests of justice favour obtaining the disclosure (the Court of Appeal considered that the privacy policies of both Bell and Rogers limited their customers' expectations of privacy.)

- Other cases in which Norwich Orders were granted include the following:
  - In *Olsen v. Facebook*, the applicants obtained a Norwich Order forcing Facebook to provide information concerning the creation of three Facebook accounts from which allegedly defamatory comments were posted.[10]
  - In *Carleton Condominium Corporation No. 282 v. Yahoo! Inc.*, the applicant obtained a Norwich Order against Yahoo! requiring it to disclose information necessary to identify the author of allegedly defamatory emails.[11]
- In situations in which a Norwich Order is not available or appropriate, counsel should consider whether the evidence could be obtained through an order under Rules 30.10 and 30.11, which deal with the discovery of non-parties (which requires leave).

4. Ethical Considerations When Attempting To Find Social Media Evidence

- Counsel's use of social media as an investigative tool raises a variety of ethical considerations, and lawyers must be aware of their professional obligations when gathering such evidence. The following two rules of the Rules of Professional Conduct have particular relevance when considering how to find and gather social media evidence:
  - Rule 7.2-6 prevents a lawyer from approaching or communicating directly with another party who is represented by a lawyer;[12] and
  - Rule 5.1-5 requires lawyers to be courteous and civil and to act in good faith with all persons with whom they have dealings in the course of their practice.[13] The key is the lawyer's obligation to act in good faith.
- While collecting information that is publicly available from social media sources using simple internet searches will not likely raise any issues, ethical concerns arise where it is necessary to do more than just go to a webpage to see the contents of a social media account.
- For instance, it may be a breach of lawyers' professional duties, as well as a breach of the obligations to act in good faith with all persons with whom they have dealings, to create a false profile on a social media platform in an effort to elicit information from another party's private account on that platform.[14]
- In addition, if the opposing party is represented by counsel, it is likely that a lawyer "friending" or otherwise contacting the opposing party over social media will be considered to have directly contacted the opposing party.[15]
- Various bar associations in the United States have issued opinions that suggest that counsel seeking access to the social media accounts of opposing parties or witnesses for the purpose of gathering evidence for use in litigation – whether directly or through an agent – will violate professional conduct rules if the lawyer (or agent) seeking access to the account does so deceptively.[16] For example:
  - The Bar Association of the City of New York has said that counsel may contact unrepresented parties through a social networking website as long as counsel disclose their real names and use only truthful information to obtain access to the unrepresented person's social media account; and
  - The San Diego County Bar Association requires counsel to disclose not only their real names but also the purpose for the request.
- Given the uncertainty and lack of guidance in Ontario, lawyers should use caution and consider their professional obligations before seeking to "creatively" obtain information on social media websites, if the information is not otherwise publicly accessible.

PART B – USING SOCIAL MEDIA EVIDENCE

- The ways in which social media evidence can be used in litigation are as broad as the uses of other documents, although the electronic nature of such evidence, the ability of parties to amend the documents from time to time, and the ability to retrieve the documents in real time give rise to special considerations. These issues are explored below.

1. Authenticating Social Media As Evidence

- It is important for counsel to ensure that the requirements of sections 31.1 to 31.8 of the *Canada Evidence Act,* concerning authenticity and best evidence, are met with respect to any social media evidence they intend to rely upon. While the requirements are ultimately not difficult to satisfy, failure to do so might result in adverse consequence.
  - Authenticity: "Authentication" for the purposes of admissibility is a threshold test requiring that there

be some basis for leaving the evidence to the factfinder for ultimate evaluation. In *R. v. Butler,* for example, the Court held that where there was a live issue as to whether the accused generated the Facebook entries in question, such an issue would be for the jury to decide.[17] Authenticity can also be established circumstantially. Social media might be circumstantially authenticated by examining the contents of the home page identifying whose social media account it is. This requires reliance on the notorious and incontrovertible fact that the accepted, routine and widely dependable way to identify the individuals who operate social network pages and blogs is to examine the identifying information supplied.[18]

- Best Evidence: That a social media post is "best evidence" can be demonstrated in one of two ways. First, if someone familiar with the information originally inputted testifies that the document being offered is an accurate record of that information, authenticity and best evidence standards will have been met, for this is evidence that the computer system, having faithfully reproduced the information, must have been functioning as it should.[19] Alternatively, if a document appears on its face to be what it is claimed — for example, an email or a text — testimony that it is the document that was received or sent by email or text will be presumed to satisfy the authenticity and "best evidence" requirements, unless the opposing party raises a doubt about whether the computer system was operating properly. Again, the apparent coherence of the document coupled with the fact that it was produced or retrieved in the fashion that a functioning computer would produce or retrieve documents is evidence that the electronic document system was functioning as it should.[20]

- In *R. v. Nde Soh*, the New Brunswick Court of Queen's Bench considered photographs of a complainant's computer screen showing a Facebook conversation as well as printouts of five screen captures. The Court found the screen printouts were authentic and admitted them as evidence.[21] This depended on the Court determining that the electronic system was operating properly and that the document was what it purported to be. The judge noted the following:

  > "I find that the electronic documents system in which this electronic document was recorded or stored was reliable since I am satisfied on the evidence that the electronic system was operating properly at the time. No evidence to the contrary was presented and there is no other reasonable ground to doubt the integrity of the electronic documents system. Therefore, the electronic document printout satisfies the best evidence rule. I am satisfied on the evidence that the document is what it is purported to be, that is, the printout of a Facebook conversation between the complainant and a person who uses the account for which the username is "Galuce Soh". Therefore, the screen capture printouts are admissible as electronic."[22]

- While that case set a relatively low threshold for admitting the evidence, the Ontario Superior Court of Justice dealt with a related issue in *R. v. Andalib-Goortani*. When the Crown sought to introduce a picture posted anonymously on a web site, the absence of metadata showing the underlying information about the file created a doubt about whether someone had altered the evidence, and the evidence was therefore held to be inadmissible.[23]

- When capturing images of social media postings from the Internet to be used in litigation, counsel should attempt to preserve as much metadata as possible. This might require engaging computer technicians to save the necessary information. However, there are a number of other tools that are available. Hannah Saunders, in her article "Social Media as Evidence in Family Court: Understanding How to Find and Preserve Information", provides some practical insights into using these tools:

  > "Taking a screen shot will preserve exactly what you are viewing. Awesome Screenshot, Screenshot (by Google), and Fireshot for Internet Explorer are screen shot tools that will allow you to take a picture and also allow you to blur names and faces, or make notes as needed[24]
  >
  > …
  >
  > WinHTTrack is a free online program that can be used to create an archive of a webpage at any given time. This tool can be particularly useful for blogs[25]
  >
  > …
  >
  > When looking for what a webpage looked like previously, … Wayback Machine [can be used] to find archived information on the Internet. The Wayback Machine is a service offered by The Internet Archive, a library of Internet sites and cultural artifacts in digital form. This service allows a person to search the Internet Archive's more than 150 billion stored pages. This resource allows one to search a particular webpage address and choose a date range to find the archived versions of the webpage. The Wayback Machine does not allow you to look at archived Facebook pages; however, it could be helpful for

researching someone who kept a blog, or is known for participating or commenting on certain websites. The archive will give you pictures of what a webpage looked like on a certain date, which is helpful for finding deleted posts or comments."[26]

2. Risks Associated With Viewing Social Media "Live" In Court

- One of the unique potential uses of social media is the ability to present the "live" evidence in the courtroom for impeachment purposes or to give more dramatic effect to the evidence (assuming other evidentiary rules are adhered to). However, there are risks with taking this approach.
- *R. v. Elliott* involved allegations of harassment over Twitter, so the evidence tendered was entirely comprised of electronic social media records.[27] The case provides a good example of the types of practical issues that may arise when using social media evidence live at trial:
    - The prosecution first attempted to transcribe the tweets through social media listening software, but this created an incomplete record of the tweets, improper transcription of punctuation, and the absence of links and attachments.[28]
    - To remedy the deficiencies, the prosecution created electronic files that showed the tweet as it appears in Twitter. This required the Court to connect to the Internet and the Twitter website. On more than one occasion, the lawyers for both the prosecution and the defence could not open a tweet because the complainant, who was testifying, had locked her account and made it private before she testified. A similar issue happened to the trial judge when he was attempting to review the evidence while preparing his reasons for judgment.[29]
    - The electronic evidence ultimately had to be printed to create a stable record of the evidence that was introduced at trial.[30]

3. Understanding Language Used In Social Media

- Another issue counsel must consider is how to prove the meaning of the contents of social media posts. While certain acronyms often used in electronic communications have become so widely known and notorious that a court might take judicial notice of their meaning – e.g., LOL, BTW, IDK – many other acronyms, words and sayings are not as well-known and new terms are being created all the time. Counsel cannot necessarily assume that the meaning of acronyms or slang commonly used in social media will be understood by the court or jury. This issue becomes even more problematic with the increasing rate at which emojis replace words in social media, text messages and emails to convey information. For example, in a sexual harassment case, will the repeated use of certain emojis that have taken on certain sexualized meanings be found to constitute unwelcomed sexual advances?
- In *Barrick Gold Corp. v. Lopehandia*, one of the first cases dealing with Internet defamation in Ontario, Justice Blair of the Ontario Court of Appeal overturned the trial judge's findings that certain statements posted on electronic bulletin boards would not be taken seriously by the general public because of the defendant's use of all-caps, excessive punctuation and different use of language. In finding there was defamation that warranted a substantive award of damages, Justice Blair stated:

    > "The notion that Mr. Lopehandia's Internet dialogue style -- a style that may not be taken seriously in a traditional medium such as a newspaper -- may undermine the credibility of his message has some appeal to those of us who are accustomed to the traditional media. However, as I have noted, the Internet is not a traditional medium of communication. Its nature and manner of presentation are evolving, and there is nothing in the record to indicate that people did not take Mr. Lopehandia's postings seriously. In fact, the uncontradicted evidence is to the contrary.
    >
    > … In those circumstances, I find the motions judge's conclusion that people were unlikely to take Mr. Lopehandia's messages seriously to be contrary to the evidence."[31]

- Although Justice Blair recognized that courts should appreciate that writing on the Internet might be different than writing in traditional media, counsel must ensure they have sufficient evidence to allow the trier of fact to interpret any "Internet-speak" contained in the social media evidence presented to the court.

4. Dealing With Deleted Accounts

- Where a party shuts down social media accounts after the events in issue or in anticipation of litigation, the court may draw an adverse interest against the party if the information is no longer available for production. In *Terry v. Mullowney*, the plaintiff in a personal injury action shut down his Facebook profile after being confronted with the contents of his public profile. The Court stated:

> "Without [Facebook] evidence, I would have been left with a very different impression of Mr. Terry's social life. He admitted as much in cross-examination.
>
> After he was confronted with this information which is publicly accessible, he shut down his Facebook account saying he did it because he didn't want "any incriminating information" in Court. I draw an adverse inference against Mr. Terry on account of this statement and conclude that the Facebook account which he shut down and some particular messages which he deleted prior to shutting down the account entirely contained information which would have damaged his claim."[32]

5. Examples of How Social Media Evidence Was Used

- In criminal cases, social media evidence has been admitted to prove both: (i) criminalized online conduct (see for example *R. v. Elliott*, in which the accused's communications with his accusers over Twitter were used as evidence of criminal harassment;[33] and *R. v. Weavers*, in which the accused's postings on Myspace substantiated allegations of a death threat[34]); and (ii) *mens rea and actus reus* elements of offline crimes (see for example *R. v. Todorovic,* in which the accused's chats on Facebook were admissible to prove *mens rea*,[35] and *R. v. Butler*, in which statements of a murder victim to third parties over Facebook regarding her fears of the accused were admitted[36]).
- In personal injury cases, such as *Leduc* and *Schuster*, social media evidence is frequently sought and used to demonstrate that a personal injury plaintiff's damages are not as extensive as pleaded. In *Bagasbas v. Atwal*, for example, the plaintiff claimed to have sustained lasting injuries as a result of the defendant's negligence. The plaintiff claimed to no longer be able to kayak, hike, or cycle; however, the defendant produced photographs posted on the plaintiff's Facebook profile which showed the plaintiff engaged in precisely these activities. As a result, the Court held the plaintiff suffered no lasting injuries.[37]
- In family cases, social media evidence has been used to demonstrate a party's lifestyle and means. In *Kolodziejczyk v. Kozanki*, the father failed in his attempt to reduce the amount of child support he was required to pay. Photos from his Facebook account showing him posing with motorcycles and a powerboat and his partner in skydiving gear were used as evidence that he could afford the child support, given the "comfortable lifestyle" he displayed.[38] Another example is *Waters v. Waters*, a divorce proceeding in which social media evidence was used by both parties.[39]
- In labour and employment cases, social media evidence is often adduced to defend actions of wrongful termination. In *Lougheed Imports Ltd v. United Food and Commercial Workers*, the employer used evidence of the employees' offensive posts on Facebook to justify termination for cause.[40] In *Alberta v. Alberta Union of Provincial Employees*, the arbitration board took into consideration the disparaging nature of a dismissed employee's negative comments about her colleagues.[41]
- In defamation cases, individuals have been held liable for defamatory content published to social media pages, even if it originates from so-called "private" accounts. In *Windsor-Essex Catholic District School Board v. Lentini*, a parent upset over changes to a school's hockey program started Facebook groups, where the parent accused the school principal of pedophilia and engaging in sexual relationships with other teachers, and compared the principal to Hitler through digitally altered photographs. The parent was held liable for defamation.[42] The Supreme Court of Canada has also commented on liability for simply hyper-linking to defamatory content. It ruled that a hyperlink by itself is not publication of the material to which it refers, but when the person hyper-linking presents the content in a way that actually repeats the defamatory information, he or she could be liable.[43]

CONCLUSION

Social media has revolutionized the way humans interact. It has also created a new, and potentially vast and powerful way for counsel to get insight into the parties' dealings and actions. Counsel must therefore remain conscious of the new and developing sources of social media evidence, as well as the unique evidentiary opportunities and threats that social media presents.

Endnotes

[1] Jason Wadden is a partner at Goodmans LLP and Sarah Stothart is an associate at Goodmans LLP.

[2] Claire E. Hunter and Julia Roos (2015), "Litigation in the Facebook Age: Creative Discovery through Cutting-Edge Internet Research on Parties and Witnesses," The Continuing Legal Education Society of British Columbia.

[3] [2009] O.J. No. 681, para. 28 (Ont. S.C.J.).

[4] 2011 ONSC 1430 (Ont. S.C.J.).

[5] Pamela D. Pengelley (2010), "Fessing up to Facebook: Recent Trends in the Use of Social Network Websites for Civil Litigation", 7 C.J.L.T 1., p. 324 ("**Pengelley**").

[6] [2009] O.J. No. 4518 (Ont. S.C.J.).

[7] *Leduc*, *supra*, para. 32 (Ont. S.C.J.).

[8] *Ibid*., para. 33.

[9] [2009] O.J. No. 3689 (Ont. C.A.).

[10] 2016 NSSC 155 (N.S.S.C.).

[11] 2017 ONSC 4385 (Ont. S.C.J.).

[12] Rules of Professional Conduct, rule 7.2-6.

[13] Rules of Professional Conduct, rule 5.1-5.

[14] Pengelley, *supra*, p. 329.

[15] Gideon Christian (2017), "Ethical and Legal Issues in E-Discovery of Facebook Evidence in Civil Litigation", 15 Can. J. L. & Tech. 335 ("**Christian**").

[16] Pengelley, *supra*, and Christian, *supra*.

[17] [2009] A.J. No. 1242 (Alta. Q.B.).

[18] David M. Paciocco, (2015), "Proof and Progress: Coping with the Law of Evidence in a Technological Age", 11 C.J.L.T., p. 198 ("**Paciocco**").

[19] *Ibid*., p. 193.

[20] *Ibid*.

[21] 2014 NBQB 20 (N.B.Q.B.).

[22] *Ibid*., para. 30.

[23] 2014 ONSC 4690 (Ont. S.C.J.).

[24] Hannah Claire Saunders (2015) "Social Media as Evidence in Family Court: Understanding How to Find and Preserve Information", 40 Can. L. Libr. Rev. 11, p.14.

[25] *Ibid*.

[26] *Ibid*.

[27] 2016 ONCJ 35 (Ont. Ct. J.).

[28] Timothy Banks (2016), "Evidence and Social Media: Notes from the Canadian Twitter Trial." Published on mondaq.com.

[29] *Ibid*.

[30] *Ibid*.

[31] [2004] O.J. No. 2329 (Ont. C.A.), paras. 38 and 43.

[32] 2009 NLTD 56 (N.L. Trial Div.), para. 105.

[33] 2016 ONCJ 35 (Ont. Ct. J.)

[34] 2009 ONCJ 437 (Ont. Ct. J.).

[35] 2009 CarswellOnt 4353 (Ont. S.C.J.).

[36] 2009 ABQB 97 (Alta. Q.B.).

[37] 2009 BCSC 512 (B.C.S.C.).

[38] 2011 ONCJ 6 (Ont. Ct. J.).

[39] 2012 ONSC 5393 (Ont. S.C.J.).

[40] 2010 CanLII 62482 (B.C. Lab. Rel. Board).

[41] [2008] A.W.L.D. 2982 (Alta. Arb.), rev'd 2009 ABQB 208 (Alta. Q.B.).

[42] [2010] O.J. No. 5103 (Ont. Sup. Ct.).

[43] *Crookes v. Newton*, 2011 SCC 47 (S.C.C.).

About Goodmans

Goodmans is internationally recognized as one of Canada's pre-eminent business law firms. Based in Toronto, the firm has market-leading expertise in M&A, corporate and transaction finance, private equity, real estate, tax, restructuring, litigation and other business-related specialties.

The firm represents a broad range of Canadian and foreign clients from entrepreneurial businesses to multinational corporations, financial institutions, pension funds and governments and has a reputation for handling challenging problems, often international in scope, which demand creative solutions.

At Goodmans, our lawyers excel in their fields to help our clients excel in theirs – ensuring exceptional levels of service and business success. We deliver intelligent results, responsiveness, energy, talent and determination to get the deal done.

Goodmans LLP

Barristers & Solicitors / goodmans.ca