

## In the Supreme Court of British Columbia

Claimant:

**JOHN JAMES DOE**

Respondent:

**JANE JANICE DOE**

### APPLICATION RESPONSE

**Application Response of Jane Janice Doe** (the “application respondent(s)”)

THIS IS A RESPONSE TO the Notice of Application of **John James Doe**, filed on **1 March 2013**.

#### Part 1: Orders Consented To

The application respondent consents to the granting of the orders set out in the following paragraphs of Part 1 of the Notice of Application on the following terms:

1. An order that the Application Respondent be restrained from disposing of the family property and other property at issues, on the conditions that the Application Respondent be able to meet her reasonable day to day living expenses and that the Applicant be subject to a similar restraining order on similar terms.

#### Part 2: Orders Opposed

The application respondent opposes the granting of the orders set out in paragraphs 1 and 3 of Part 1 of the Notice of Application.

#### Part 3: Orders on which No Position is Taken

The application respondent takes no position on the granting of the orders set out in paragraphs \_\_\_\_\_ of Part 1 of the Notice of Application.

#### Part 4: Factual Basis

1. The parties frequently travelled out of British Columbia during their marriage, including to visit the Application Respondent's family in Louisiana and the Applicant's family in Iceland.
2. The Applicant Respondent's upcoming trip to visit her family in Louisiana was planned before the parties' separation, with the consent of the Applicant. The tickets have already been paid for and the Application Respondent has booked the necessary time off work.
3. The home of the Application Respondent's parents is a one-bedroom alligator shack on the bayou with no running water. It is not a suitable place for Application Respondent and the two children to stay for any more than a few days; there is no risk that the Applicant Respondent will flee with the children to Louisiana.

#### **Part 5: Legal Basis**

1. The Applicant consented to the Application Respondent's trip with the children to Louisiana. It is only now that the parties have separated that he objects, and there is no risk that the Application Respondent will abduct the children to Louisiana.

#### **Part 6: Material to be Relied Upon**

1. Affidavit #1 of Jane Janice Doe, made on 15 March 2013; and,
2. Affidavit #1 of Iphigenia Smith, the Application Respondent's mother, made on 10 March 2013.

The application respondent estimates that the application will take 30 minutes.

- The application respondent has filed in this family law case a document that contains the application respondent's address for service.
- The application respondent has not filed in this family law case a document that contains the application respondent's address for service. The application respondent's ADDRESS FOR SERVICE is:

Date: 15 March 2013

*Jane Doe*

JANE JANICE DOE

Application Respondent