

FORM 14E

Courts of Justice Act

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

ZEXI LI

Plaintiff

-and-

**CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING, and
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5, JOHN
DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10, JOHN DOE 11,
JOHN DOE 12, JOHN DOE 13, JOHN DOE 14, JOHN DOE 15, JOHN DOE 16,
JOHN DOE 17, JOHN DOE 18, JOHN DOE 19, JOHN DOE 20, JOHN DOE 21,
JOHN DOE 22, JOHN DOE 23, JOHN DOE 24, JOHN DOE 25, JOHN DOE 26,
JOHN DOE 27, JOHN DOE 28, JOHN DOE 29, JOHN DOE 30, JOHN DOE 31,
JOHN DOE 32, JOHN DOE 33, JOHN DOE 34, JOHN DOE 35, JOHN DOE 36,
JOHN DOE 37, JOHN DOE 38, JOHN DOE 39, JOHN DOE 40, JOHN DOE 41,
JOHN DOE 42, JOHN DOE 43, JOHN DOE 44, JOHN DOE 45, JOHN DOE 46,
JOHN DOE 47, JOHN DOE 48, JOHN DOE 49, JOHN DOE 50, JOHN DOE 51,
JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55, JOHN DOE 56,
JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60**

Defendants

**AFFIDAVIT OF [REDACTED]
(Sworn February 5, 2022)**

I, [REDACTED], of City of Ottawa, in the Province of Ontario, MAKE
OATH AND SAY:

1. I have personal knowledge of the facts and matters hereinafter deposed to.
2. I work as an Officer in Community Initiatives at United Way East Ontario. The majority of my work involves supporting several key initiatives that UWEO has spearheaded, namely: employment for persons with disabilities, employment for Indigenous youth, successful aging for seniors and community wealth building, which includes social procurement. The bulk of my work centres around community building, the fostering of partnerships to improve the quality of life of the most vulnerable or enhancing the capacity of agencies and thereby uplift our collective community engagement to make Ottawa a better city for everyone.
3. I reside in the downtown core in Ottawa, Ontario, approximately 10 blocks south of Parliament Hill.
4. Since the Freedom Convoy 2022 (“Freedom Convoy”) arrived in Ottawa on January 28, 2022, I have walked up to Parliament Hill from my home seven or eight times. In doing so, I have visited and spoken with many truckers and supporters of the Freedom Convoy who were located on Metcalfe Street, Slater Street, Kent Street, Bank Street, Wellington Avenue and in Confederation Park. I estimate I have spoken to at least 35 to 40 truckers and supporters since January 28, 2022. In these encounters, I have observed that all of the truckers I met have been, at all times, friendly, courteous, humble, considerate and peaceful. At no time have observed any aggressive or inappropriate behaviour nor have I at any time felt intimidated or unsafe. I state this as someone who was once the victim of assault on the streets of Ottawa in 2004 and who suffered PTSD as a result.
5. I have also observed that the truckers, and their supporters, are made up of the most diverse, inclusive and varied cross-section of Canadian demographics that I have ever

experienced in my life. As examples, I saw a Sikh truck driver with his children, an Indigenous elder giving a blessing to the gathering, a black preacher performing a Sunday service, Canadians of all ethnicities and multiple families with their children.

6. I have observed truckers decorating the Tomb of the Unknown Soldier with flowers as well as guarding it. I also observed an encampment beside the Terry Fox Memorial as a means of watching watch over it. At no point have I ever seen violent or threatening behaviour.
7. My ability to travel in downtown Ottawa, or to and from Parliament Hill has not been impeded by the presence of the truckers. On the contrary, the atmosphere on Parliament Hill has always been safe, welcoming and congenial.
8. Regarding the honking of horns, I live downtown and my sleep at night has not been disrupted by any unwanted sound. I have observed that the truckers do not honk their horns at night. Furthermore, my everyday life has not been disrupted by any noise related to the Freedom Convoy during the day.
9. What I have observed is not in accord with what I have seen in the media or what I have experienced directly either with the truckers, their supporters or the gathering of people on Parliament Hill. The media appears to be framing the convoy and the events around their presence in Ottawa in the most unfavourable, erroneous and distorted manner possible.

10. I swear this affidavit bona fide and for no other improper use.

Sworn Remotely by videoconference by [REDACTED])

[REDACTED] stated as being)

located in Ottawa, Ontario before me at the)

City of Brampton in the Province of Ontario,)

this 5 day of February, 2022.)

[REDACTED]

[REDACTED]

[REDACTED]

A Commissioner, etc.)

ZEXI LE

and

CHRIS BARBER, et al.

Plaintiff (Moving Party)

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

**ONTARIO
SUPERIOR COURT OF JUSTICE**

AFFIDAVIT OF
[REDACTED]

**JUSTICE CENTRE FOR
CONSTITUTIONAL FREEDOMS**

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[REDACTED]

Counsel for the Defendants Chris Barber *et al*