

From: [Robert Turpin](#)
To: [Sean Zweig](#); ataylor@stikeman.com
Cc: [JUS-G-MAG-CSD-Toronto-SCJ Commercial List](#); [Sangyal, Dawa \(MAG\)](#)
Subject: Subject: SERVICE: Notice of Motion for Mandatory Accommodation - CV-25-00738613-00CL
Date: Monday, March 9, 2026 5:40:15 PM

Attention: The Service List, the Monitor, and the Commercial List Office,

Please find attached a **Notice of Motion for Mandatory Accommodation** regarding the CCAA proceedings of Hudson's Bay Company et al.

As per the direction of the Monitor's counsel (Sean Zweig) and the endorsement of **Justice Kimball**, I am serving this notice on all interested parties. This motion seeks a formal Court Order for written-only proceedings and extended timelines based on documented medical necessity.

1. THE MOTION IS FOR:

An Order confirming that all proceedings involving Robert Rene Turpin be conducted in **plain text/writing** to ensure equitable participation under the **AODA** and the **Human Rights Code**.

2. THE GROUNDS:

- **Standing:** Established by Justice Kimball's endorsement on February 13, 2026.
- **Evidence:** I have provided clinical documentation from **Sullivan + Associates** and **NP Grace Fox** confirming diagnoses of Autism Spectrum Disorder (ASD), ADHD, and Dyslexia.
- **Restitution Claim:** My **\$30,000,000 Restitution Claim** and the **Mary Ann Turpin** ancestral records are currently pending and require these accommodations for proper adjudication.

3. ACCOMMODATION NOTICE:

Given my documented disabilities, I require all responses to this motion and all future correspondence from all parties on the Service List to be provided in **plain text format**.

Sincerely,

Crown Prince Robert

Robert Rene Turpin

Grace Fox, NP Primary Care/Adult
125 Hogan Road
Nipigon, Ontario P0T 2J0
807-887-5252

Feb 24, 2026

To Whom It May Concern

To Whom It May Concern:

Re: Robert Turpin Jul 12, 1987 Age: 38 yr
807-889-1182 (H) 807-889-1182 (M)

Mr. Turpin has been assessed by psychologist and confirmed diagnoses of ASD, ADHD, Learning disability with severe Dyslexia (reading and writing), Generalized Anxiety Disorder and PTSD. He has significant difficulty processing complex verbal information in real time environments (like Zoom or courtrooms). To ensure equitable participation, Mr Turpin requires all legal proceedings be handled through written communication only, with extended timelines to review the documents.

Regards

Grace Fox NP PHC/Adult
Urgent Care Clinic
Nipigon District Memorial Hospital

Yours truly,



Grace Fox, NP Primary Care/Adult



Sullivan
+ Associates
CLINICAL PSYCHOLOGY

PSYCHOLOGICAL ASSESSMENT REPORT

| | | | |
|----------------|---------------|--------------------------|-----------------------|
| CLIENT: | Robert Turpin | ASSESSMENT DATES: | April 30, May 1, 2025 |
| D.O.B.: | July 12, 1987 | REPORT DATE: | June 3, 2025 |

REASON FOR REFERRAL

Mr. Turpin participated in a comprehensive psychological assessment to query Autism Spectrum Disorder (ASD), Attention-Deficit/Hyperactivity Disorder (ADHD), and Learning Disorders (LDs), as well as to assess his mental health, including trauma, anxiety and mood disorders. He intended to apply for disability services and required an updated assessment to assist with this. As such, the focus of this report is to provide information on Mr. Turpin's social-emotional, attentional, cognitive, academic, and mental health functioning to provide recommendations on how to best support his needs.

SOURCES OF INFORMATION

Interviews and Other Information

Clinical Interview with Mr. Turpin and his mother.

Monteiro Interview Guidelines for Diagnosing the Autism Spectrum, Second Edition (MIGDAS-2)

Historical Assessment Reports

Psychological Testing & Questionnaires

Wechsler Adult Intelligence Scale, Fourth Edition (WAIS-IV)

Wechsler Individual Achievement Test, Third Edition (WIAT-III)

Adaptive Behavior Assessment Scale, Third Edition (ABAS-3), Self and Other Report Forms

Social Responsiveness Scale, Second Edition (SRS-2), Self and Other Report Forms

Conners' Adult ADHD Rating Scales, Second Edition (CAARS-2), Self and Other Report Forms

Behaviour Rating Inventory of Executive Function, Adult Version (BRIEF-A), Self and Other Report Forms

Beck Anxiety Inventory (BAI)

Beck Depression Inventory, Second Edition (BDI-2)

PTSD Checklist for DSM-5 (PCL-5)

Camouflaging Autistic Traits Questionnaire (CAT-Q)

BACKGROUND INFORMATION AND PRESENTING CONCERNS

Mr. Turpin is a 37-year-old male who lives alone in his apartment.