

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE KINGDOM OF HEAVEN FOUND A SEAN  
(An Express Trust Organization)

Plaintiff

and

TANJA JOHNSON, HALA TABL and MICHAEL VON DEHN

Defendants

**COSTS OUTLINE OF  
MICHAEL VON DEHN**

**(Summary Judgment Motion – To Be Heard October 23, 2023)**

The Moving Party/Defendant (“**Michael**”) provides the following outline of costs he will seek:

	<b>PARTIAL (60%)</b>	<b>SUBSTANTIAL (90%)</b>	<b>FULL</b>
Fees (inclusive of disbursements and HST) sought for entirety of proceeding	\$ 18,019.29	\$27,028.94	\$30,032.15

**The following points are made in support of the costs sought with reference to the factors set out in subrule 57.01(1):**

- the amount claimed and the amount recovered in the proceeding

This action involves the Estate of Joachim von Dehn, the father of the defendants Tanja Johnson (“**Tanja**”) and Michael. The primary asset of the Estate is surplus funds of \$306,000, remaining after the deceased’s home (the “**Home**”) was sold through a power of sale.

The Plaintiff has brought meritless and outrageous claims against the defendants. He is claiming from the defendants for just under \$900,000.00 in cash plus interest, that the deceased’s Home itself somehow be transferred to him, for an ounce of gold for every month that a “foreign tenant” remains at the Home, for a brand-new

Porsche automobile, and is also claiming a lien of some kind on all of Michael's assets.

Given the magnitude of the relief being sought, Michael was compelled to retain a lawyer to vigorously defend this proceeding.

- the complexity of the proceeding

The proceeding is not especially complex, as the claims are simply baseless. Because there is no genuine issue for trial, Michael has proceeded by way of this summary judgment motion.

- the importance of the issues

The issues in this proceeding are important to the parties in that it involves their father's Estate. This Estate should be able to move forward, almost four years after the deceased's passing.

- the conduct of any party that tended to shorten or to lengthen unnecessarily the duration of the proceeding

The Plaintiff's conduct throughout this proceeding has been entirely unreasonable. The action as a whole is completely meritless, and has only served to harass his siblings and put them to unreasonable expense.

Moreover, this summary judgment motion was originally scheduled to proceed virtually on September 7, 2023. Apparently due to the Plaintiff indicating that he would be recording the proceeding (which he has done previously at a different court appearance), the matter was adjourned and re-scheduled as an in-person matter.

This necessitated Michael incurring considerable additional expense to have his counsel (who practices in Waterloo) attend the motion in-person.

It is also noteworthy that throughout this proceeding the Plaintiff has constantly been verbally abusive in his communications, regularly making baseless allegations of criminality, fraud, contempt of court, etc.

- whether any step in the proceeding was improper, vexatious or unnecessary or taken through negligence, mistake or excessive caution

See above.

- a party's denial of or refusal to admit anything that should have been admitted

Plaintiff did not file any responding affidavit material for use on this summary judgment motion, but still required it to proceed.

- the experience of the party's lawyer

Christopher Crisman-Cox, 2017 Call

- the hours spent, the rates sought for costs and the rate actually charged by the party's lawyer

<p>FEE ITEMS <i>(e.g. pleadings, affidavits, cross-examinations, preparation, hearing, etc.)</i></p>	<p>PERSONS <i>(identify the lawyers, students and law clerks who provided services in connection with each item together with their year of call, if applicable)</i></p>	<p>HOURS <i>(specify the hours claimed for each person identified in column 2)</i></p>	<p>ACTUAL RATE</p>
<p>Initial consultation with client; initial communications with counsel for other defendants to determine litigation strategy; preparation of Statement of Defence</p>	<p>C. Crisman-Cox, 2017 Call \$385/hr</p>	<p>9.7</p>	<p>\$3,734.50</p>
<p>Research regarding Requisition for dismissal under Rule 2.1.01; communications with client and other counsel regarding same; preparation and submission of Requisition; review of endorsement from courthouse and further communications with client and other counsel regarding further litigation strategy</p>	<p>C. Crisman-Cox, 2017 Call \$385/hr</p>	<p>5.8</p>	<p>\$2,233.00</p>
<p>Preparation of summary judgment request form and co-ordination with other counsel regarding same; preparation of memorandum required for case conference prior to motion scheduling; communications with courthouse, client, and other counsel with respect to initiating summary judgment motion process</p>	<p>C. Crisman-Cox, 2017 Call \$385/hr (2022) \$425/hr (as of Jan 2023)</p>	<p>7.3</p>	<p>\$3,269.00</p>
<p>Preparation and attendance at case conference for summary judgment motion; communications with client regarding same</p>	<p>C. Crisman-Cox, 2017 Call \$425/hr</p>	<p>2.0</p>	<p>\$850</p>

<p style="text-align: center;">FEE ITEMS</p> <p style="text-align: center;"><i>(e.g. pleadings, affidavits, cross-examinations, preparation, hearing, etc.)</i></p>	<p style="text-align: center;">PERSONS</p> <p style="text-align: center;"><i>(identify the lawyers, students and law clerks who provided services in connection with each item together with their year of call, if applicable)</i></p>	<p style="text-align: center;">HOURS</p> <p style="text-align: center;"><i>(specify the hours claimed for each person identified in column 2)</i></p>	<p style="text-align: center;">ACTUAL RATE</p>
<p>Review of endorsement regarding motion to strike brought by co-defendant Hala Tabl and reporting to client on same</p>	<p>C. Crisman-Cox, 2017 Call \$425/hr (note: discount applied)</p>	<p style="text-align: center;">0.2</p>	<p style="text-align: center;">\$67.11</p>
<p>Drafting Notice of Motion and affidavit for summary judgment motion; communications with client and other counsel regarding same; review of summary judgment motion record from co-defendant;</p>	<p>C. Crisman-Cox, 2017 Call \$425/hr (note: discount applied)</p>	<p style="text-align: center;">15.1</p>	<p style="text-align: center;">\$5,102.89</p>
<p>Preparation and attendance at case conference for summary judgment motion; communication with client, courthouse, and opposing party regarding same</p>	<p>C. Crisman-Cox, 2017 Call \$425/hr</p>	<p style="text-align: center;">0.7</p>	<p style="text-align: center;">\$297.50</p>
<p>Drafting factum for summary judgment motion;</p>	<p>C. Crisman-Cox, 2017 Call \$440/hr (of as July 2023) (note: discount applied)</p>	<p style="text-align: center;">8.2</p>	<p style="text-align: center;">\$1,848.00</p>
<p>Preparation for motion and communications regarding same; virtual court attendance with respect to re-scheduling motion to be in-person and communications regarding same; preparation of Costs Outline</p>	<p>C. Crisman-Cox, 2017 Call \$440/hr</p>	<p style="text-align: center;">6.9</p>	<p style="text-align: center;">\$3,036.00</p>

<p style="text-align: center;">FEE ITEMS</p> <p style="text-align: center;"><i>(e.g. pleadings, affidavits, cross-examinations, preparation, hearing, etc.)</i></p>	<p style="text-align: center;">PERSONS</p> <p style="text-align: center;"><i>(identify the lawyers, students and law clerks who provided services in connection with each item together with their year of call, if applicable)</i></p>	<p style="text-align: center;">HOURS</p> <p style="text-align: center;"><i>(specify the hours claimed for each person identified in column 2)</i></p>	<p style="text-align: center;">ACTUAL RATE</p>
<p>Estimated time for travel and attendance at Ottawa courthouse for in-person hearing of summary judgment motion</p>	<p>C. Crisman-Cox, 2017 Call \$440/hr</p>	<p style="text-align: center;">12.0</p>	<p style="text-align: center;">\$5,280.00</p>
		<p style="text-align: center;"><b>TOTAL</b></p>	<p style="text-align: center;">\$25,718.00</p>
		<p style="text-align: center;"><b>INCL. HST</b></p>	<p style="text-align: center;">\$29,061.34</p>

**Disbursements**

- Statement of Defence - \$183
- Notice of Motion - \$339
- Flight and hotel for in-person motion hearing - \$448.81
- Total disbursements: \$970.81

**LAWYER'S CERTIFICATE**

I CERTIFY that the hours claimed have been spent, that the rates shown are correct and that each disbursement has been incurred as claimed.

October 21, 2023



THE KINGDOM OF HEAVEN FOUND A SEAN  
(An Express Trust Organization)

Plaintiff

and

JOHNSON et al.  
Defendants

Court File No.: CV-00089835-0000

**ONTARIO**  
**SUPERIOR COURT OF JUSTICE**

Proceeding commenced at OTTAWA

**COSTS OUTLINE OF**  
**MICHAEL VON DEHN**  
**(Summary Judgment Motion - October 23,**  
**2023)**

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