

REGISTRY FILE NUMBER 2170295
REGISTRY LOCATION Vancouver

# REPLY

IN THE PROVINCIAL COURT OF BRITISH COLUMBIA (SMALL CLAIMS COURT)

- To a Claim  
 To a Counterclaim

REPLY

**TO:**  
Copy the name, address and telephone number of the claimant from the Notice of Claim or Notice of Civil Resolution Tribunal Claim.

NAME Jessica Simpson CLAIMANT(S)  
 ADDRESS 505 - 8840 210 St.

CITY, TOWN, MUNICIPALITY Langley PROV. British Columbia POSTAL CODE V1M 2Y2 TEL. # 778 825 0259

**FROM:**  
Fill in the name, address and telephone number of the defendant filing this reply.

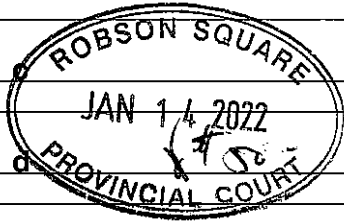
NAME Vancouver Coastal Health Authority operating as Three Bridges Clinic DEFENDANT  
 ADDRESS c/o Dives, Harper, Stanger & Mizrahi LLP attn: Eric Stanger  
600 - 815 Hornby Street

CITY, TOWN, MUNICIPALITY Vancouver PROV. British Columbia POSTAL CODE V6Z 2E6 TEL. # 604 605 1400

**DISPUTE:**

Using the "HOW MUCH" section of the Notice of Claim or the Notice of Civil Resolution Tribunal Claim as a guide, tell why you disagree with each part (a - e). If you agree with parts of the claim say so.

- a See attached Schedule "A"
- b
- c
- d
- e



**AGREEMENT WITH THE CLAIM:** I (NAME) NIL

agree to pay \$

If you agree to pay all or part of what is claimed, make a proposal.

I could make the following payments:  
(GIVE DATES AND AMOUNTS)

**COUNTERCLAIM** (YOU SHOULD ONLY FILL OUT THIS PART OF THE FORM IF YOU WISH TO MAKE A CLAIM AGAINST THE CLAIMANT)  
 (THIS PART IS NOT TO BE USED WHEN REPLYING TO A COUNTERCLAIM OR TO A NOTICE OF CIVIL RESOLUTION TRIBUNAL CLAIM)

**WHAT HAPPENED?**

Briefly tell what has led to your counterclaim.

**HOW MUCH?**

Tell what you are claiming. If your counterclaim has more than one part, separate each part and fill in each individual amount, then add the individual amounts to make the total.

<u>a</u>	<u>NIL</u>	\$	
<u>b</u>		\$	
<u>c</u>		\$	
<b>TOTAL</b>		\$	0.00
<b>+ FILING FEES</b>		\$	
<b>= TOTAL CLAIMED</b>		\$	

court copy

court copy

**IN THE PROVINCIAL COURT OF BRITISH COLUMBIA**

BETWEEN:

JESSICA SIMPSON

PLAINTIFF

AND:

VANCOUVER COASTAL HEALTH AUTHORITY operating as  
THREE BRIDGES CLINIC

DEFENDANT

**SCHEDULE "A"**

1. In response to the whole of the Notice of Civil Claim, the defendant specifically denies that it, or any employees, servants or agents of the defendant Vancouver Coastal Health Authority were negligent or in breach of any duty as alleged or at all, and further specifically denies that the plaintiff has suffered the injury, loss, and damage claimed, or any loss or damage at all.
2. The plaintiff attended Three Bridges Clinic between approximately February 2, 2021 and June 10, 2021 for care (the "Treatment Period").
3. This defendant further says that any and all care and treatment rendered to the plaintiff by this Defendant and by any employee of the Health Authority during the Treatment Period was rendered with reasonable skill, care and diligence, and in accordance with accepted standards of practice.
4. In response to the whole of the Notice of Civil Claim this defendant specifically denies that it or its employees, servants or agents were negligent or in breach of any duty as alleged or at all during the Treatment Period, and further specifically denies that the plaintiff has suffered the injury, loss and damage claimed, or any injury loss or damage at all.
5. In the alternative and in further answer to the whole of the Notice of Civil Claim, if this defendant was negligent or in breach of duty as alleged or at all, which is not admitted but is specifically denied, then such negligence or breach did not cause or contribute to any injury, loss, damage or expense allegedly suffered by the plaintiff.
6. In the further alternative and in further answer to the whole of the Notice of Civil Claim, if the plaintiff suffered or will continue to suffer any injury, loss, damage or expense as claimed or at all, then the plaintiff has failed to mitigate her losses by failing to take all reasonable steps to minimize or avoid such injury, loss, damage or expense.

Defendant's address for service:

Dives, Harper, Stanger & Mizrahi LLP  
Barristers and Solicitors  
600 – 815 Hornby Street  
Vancouver, B.C. V6Z 2E6  
Attention: Eric Stanger

Fax number for service:

604-605-1414

Date: January 14, 2022

DIVES, HARPER, STANGER & MIZRAHI LLP

Per:

  
Eric Stanger

Lawyer for the defendant Vancouver Coastal  
Health Authority