

FEDERAL COURT

In the matter of Application under section 14 of the *Personal Information Protection and Electronic Documents Act*, 2000, S.C. c. 5 [PIPEDA]

BETWEEN:

IZABELA POPOVA

Applicant

– and –

THE EMPIRE LIFE INSURANCE COMPANY

MAUREEN WHEELER, MANAGER OF THE GROUP LIFE AND DISABILITY CLAIMS

Respondents

AFFIDAVIT OF DIMITRE POPOV

I, **DIMITRE POPOV**, Executive Director of Canadians for Integrity, of the City of Toronto, in the Province of Ontario, **AFFIRM THAT:**

1. The Applicant in this action, Izabela Popova, is my daughter.
2. I am familiar with the matter that gave rise to this action.

3. Since the dispute with the insurer, the Empire Life Insurance Company (the “corporate Respondent”), started, I have been helping Izabela Popova for the following reasons:
 - a. I am her father;
 - b. She was under a lot of stress at that time (the time during which she was on sick leave after she was stopped from work by her doctor because she was suffering “a lot of stress” at work);
 - c. The dispute with the Respondents was causing Izabela additional emotional and mental suffering;
 - d. Without my help, Izabela would not have been able to argue for her rights and interests which were, in my view, disregarded by the Respondents;
 - e. Without my help, Izabela would not have been able to file the Application with this Honourable Court in an attempt to seek justice and remedies for her suffering.

4. In early December 2013, I received an assessment of “Litigation Budget” made by a lawyer from McCague Borlack LLP for the legal representation of Izabela Popova which shows:

“Estimated Total: \$32,939.50”

A true copy of the document “Litigation Budget” estimate, dated December 6, 2013, is attached to my affidavit as **Exhibit “A”**.

5. I am authorized by Izabela Popova to act on her behalf in this action. A true copy of the “Authorization Letter” dated January 27, 2014 is attached hereto and marked as **Exhibit “B”**.
6. With regard to the complaint I filed on behalf of Izabela Popova against the insurer the Empire Life Insurance Company, the office of the Privacy Commissioner of Canada wrote in a letter dated October 31, 2013: “Following the investigation into your complaint, we have concluded that the matter is **well-founded** and **conditionally resolved**.” A true copy of the letter dated October 31, 2013 is attached hereto and marked as **Exhibit “C”**.
7. Any and all documents filed with this Honourable Court with regard to the proceedings have been drafted, created, and prepared by me on behalf and with the approval of the Applicant Popova.

