



# According to Rose

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## A Piece of My Mind

Welcome to fall! September is one of my favorite times of the year. Return to routine, back to school and the regular rhythms of our lives with a whole year of upcoming seasons and events to look forward to. Spending so many years in school has resulted in my feeling like the year starts in September, not fall.

This fall as you return to your activities, keep in mind a few things that you can do to keep yourself and your loved ones safe:

1. Stop distracted driving. Just say no to being distracted while you are driving. Say no to the phone. Say no to texting while driving. Say no

to applying make up while driving, eating while driving or performing any other task that distracts you from the important job of driving. Distracted driving is one of the main causes of accidents on our roads. That brief second that it takes to check a text message could change someone's life forever. It can wait until you are done driving;

2. As the weather changes and the days are darker, make sure that you are wearing appropriate clothing that enables you to be seen if you are running or walking outside. Black is one of my favorite colours too but remember if you are dressed

- in all dark clothing and it is a dark rainy day, no one can see you. Wear a lighter colored coat, or get a flasher. Anything to draw attention and ensure that you are seen;
3. Wear a helmet if you are riding a bike. Always. A helmet can prevent a brain injury. A brain injury is a life altering and often permanent consequence.
  4. Make sure that you have some type of light or reflector on your bike if you are using it to commute. With the change in the weather and the decrease in daylight hours cyclists become even harder to see.
  5. Put a light or a reflective collar or leash on your dog, especially if he is dark colored.
- Enjoy the fall and stay safe.

## The Value of Pain and Suffering

When a court is asked to assess damages following a personal injury, one of the primary components to that assessment is an award for pain and suffering. Assessment of this award is different than assessment of damages under other categories. All damages are meant to restore the individual to the position that they would have been in if they had not been injured. That often will involve a calculation of what has been lost. When it comes to pain and suffering however, that loss can not be “calculated”. Judges strive for consistency between their judgments therefore an understanding and assessment of what judges have awarded in cases provides an indication of a likely award in a similar case. Below is a summary of some of the more recently decided awards of non pecuniary damages in cases before our courts:

*Gaudreault v. Gobeil* 2015 BCSC 483 – the male plaintiff was 43 years old at the time of trial. He had been injured in an accident which occurred six years

prior to the trial. At the time of trial, the plaintiff’s complaints that he related to the accident included right shoulder pain, daily neck pain, daily low back pain and headaches. The judge concluded that the weight of the medical evidence was that the plaintiff’s neck and back would likely improve over the long term but that he would be left with some ongoing pain. It was also found to be likely that his headaches would similarly improve. The plaintiff had shoulder abnormalities which pre existed the accident but which were asymptomatic and made symptomatic by the accident. In the accident the plaintiff suffered a tearing of the bursal surface of the supraspinatus tendon and bicep tendonitis. The plaintiff may require rotator cuff surgery in the future to repair the damage caused in the accident. Non pecuniary damages of \$75,000 were awarded.

*Chenier v. Szili* 2015 BCSC 675 – the 61 year old male plaintiff was awarded \$90,000 for pain and suffering follow-

ing injuries suffered in a car accident which occurred five years prior to trial. The judge found that he had suffered neck and shoulder injuries in the accident that resolved within a few months of the accident. He continued to experience disabling levels of low back pain which limited his ability to sit, bend over or do any type of physical labour. It was found that he had a pre-existing condition in his back which was made symptomatic by the accident and that he would likely require surgery in the future. His back injury significantly impaired his ability to take part in his recreational activities and his physical relationship with his partner.

*Kaiser v. Williams* 2015 BCSC 646 – a 24 year old female plaintiff was injured when she was struck as a pedestrian in a cross walk. Her injuries included a leg fracture and injuries to her sacrum and pelvis. She was hospitalized for one month following the injury. At the time of trial, 11 years post injury, the plaintiff continued to experience a significant degree of pain and suffering and the medical evidence indicates that the level of pain may increase. She was awarded \$130,000 for pain and suffering.

*Lemyre v. Stubbart* 2015 BCSC 693 – a 43 year old female plaintiff was injured in a motor vehicle accident five years prior to trial. She was found to have suffered significant soft tissue injuries in the car accident that at the time of trial caused severe, ongoing neck pain which radiated to her left arm. The

medical evidence indicated that it was unlikely that the plaintiff would improve. Non-pecuniary damages were assessed at \$75,000.

*Blackman v. Dhaliwal* 2015 BCSC 698 – a 37 year old plaintiff was injured in a motor vehicle accident five years prior to trial. As a result of the accident she suffered soft tissue injuries to her neck and shoulder area. The injuries prevented her from participating in many of her previous activities and affected her relationship with her husband and children. The medical evidence indicated that she would permanently have mild intermittent pain, including migraines. Non-pecuniary damages were assessed at \$80,000.

*Gleason v. Yoon* 2015 BCSC 586 – The 49 year old female plaintiff was injured in a car accident which happened five years prior to trial. At trial, the judge found that she suffered moderate soft tissue injuries to her upper back, neck and left shoulder. The judge found that she had ongoing neck and left shoulder pain which was constant and was aggravated by certain activities such as using or elevating her left arm. Non-pecuniary damages were assessed at \$75,000.

*Matias v. Lou* 2015 BCSC 544 – a 57 year old female plaintiff was awarded \$50,000 for non-pecuniary damages to compensate her for injuries suffered in a motor vehicle accident which occurred four years prior to trial. The judge found that the accident caused soft tissue injury to the low back with



possibly a minor aggravation of underlying degenerative changes. The plaintiff also experienced anxiety and depression. The symptoms were continuing at the time of trial, although improving slowly.

*Curry v. Powar* 2015 BCSC 610 - \$100,000 was awarded as non pecuniary damages to a 44 year old man who was injured in a car accident three years prior to the trial. The judge found that he suffered significant injuries to his neck, shoulder, hip and back in the accident and that as a result of these injuries he required invasive neck surgery and was likely to require hip surgery and possible hip replacement surgery in the future. The plaintiff was also found to have suffered from pain syndrome, depression and chronic pain.

*Tisalona v. Easton* 2015 BCSC 565 – the 47 year old plaintiff was injured in two motor vehicle accidents, the first occurring seven years prior to the trial and the second four years prior to trial. The judge found that the plaintiff suffered ongoing discomfort until the time of the second accident and that she would continue to experience occasional neck and shoulder pain. Non pecuniary damages were assessed at \$32,000.

*Ozeer v. Young* 2015 BCSC 542 – the 29 year old male plaintiff was awarded \$95,000 for non pecuniary damages after a finding that as a result of a motor vehicle accident five years earlier he had suffered injuries including soft tissue injuries to his neck and back which

resolved in about six months and a wrist fracture. The wrist fracture was displaced and required two surgeries to repair. The judge found that the plaintiff would have some permanent wrist stiffness, pain and associated weakness. The wrist may progress to the point where he developed post traumatic arthritis and there was a small chance that a third surgery to remove the hardware would be necessary.

*Montgomery v. Williamson* 2015 BCSC 79 – the male plaintiff was injured four years prior to trial in a motor vehicle accident. At the time of trial he was suffering from chronic ongoing pain to his upper back and neck, resulting in ongoing headaches. Additionally the motor vehicle accident caused an acceleration of shoulder pain and remedial shoulder surgery. \$95,000 for non pecuniary damages was awarded.

*Hutchison v. Dyck* 2015 BCSC 1039 – the 53 year old plaintiff suffered a fractured L1 vertebrae while a passenger on a bus. At trial five years later the judge found that the injury was painful and initially debilitating and that while the pain had decreased over the years since the accident the plaintiff always had some degree of pain and might require surgery in the future. \$90,000 in non pecuniary damages was awarded.



## Hit and Run – What happens if I don't try to catch you?

Sometimes when a motor vehicle accident happens one of the motorists leaves the scene without providing their information. This is referred to as a "hit and run". If you are the victim of a hit and run you will not necessarily be entitled to compensation for the damages that you suffer. The regulations that govern ICBC require the victim of a hit and run to make reasonable efforts to ascertain the identity of the other involved motorist. A failure to do so will disentitle you to any compensation for the harm or damages that you suffer as a result of the accident. Importantly, ICBC has no obligation to tell you about the requirement that you take these steps and their failure to tell you to do so will not change your obligation in any way.

A recent British Columbia Supreme Court case, *Li v. Insurance Corp. of British Columbia* 2015 BCSC 1010 considered the duties on both ICBC and motorists following a hit and run accident. In this case the other motorist had fled the scene after the plaintiff had indicated that she would pull over to exchange information. The accident was a rear end type collision which occurred at a busy intersection. A fire truck had just passed the scene. When the other motorists fled the scene the plaintiff attended the near by fire station and spoke to the captain who told her that one of the crew had seen the accident and the other car involved. The plaintiff called ICBC to report the accident. ICBC did not tell her about the requirement to take reasonable steps to ascertain the identity of the other motorist. The plaintiff did not report the accident to the police or take any further steps to determine the identity of the other motorist.

ICBC applied to the court to have the plaintiff's claim dismissed. In determining the application the judge considered the obli-

gations on both ICBC and the motorist in a hit and run accident. The judge held that the law is clear that there is no duty on ICBC to inform potential claimants about the requirement to make reasonable efforts to identify the other motorist. The judge also found that the plaintiff had failed to take those reasonable steps that should have been taken and dismissed the claim. The steps that the judge noted the plaintiff could have taken but did not include the following:

- 1) Did not contact the fire crew member that witnessed the accident;
- 2) Did not canvass any homes or businesses in the area adjacent to the accident scene;
- 3) Did not post any signs at the nearby intersection or bus stop;
- 4) Did not report the accident to the police on the day of the accident or at any time; and
- 5) Did not ascertain if there were closed circuit cameras that might have been in place at the intersection.

If you are involved in an accident where the other motorist flees the scene of the accident remember that unless you take reasonable steps to ascertain the identity of the other motorist, you will not be entitled to any compensation for the harm or damages that you suffer due to the accident. It is not a question of whether you have been able to identify the other motorist, it is whether you have taken reasonable steps to try to identify the other motorist.



## British Columbia Supreme Court applies test established by Supreme Court of Canada in determining whether prima facie case of discrimination exists

In Human Rights cases once a complaint has been filed, the respondent to the complaint can apply to dismiss the complaint on a preliminary basis, in advance of a hearing. There is a three step test to be applied in determining whether a prima facie case of discrimination exists, which involves answering the following questions:

1. Is the complainant a member of a class which is a protected group under the Human Rights Code?
2. Has the complainant received adverse treatment with respect to a service or facility customarily available to the public? And
3. Is there a connection between the adverse treatment and the protected ground.



In 2012 the Supreme Court of Canada decided the case of *Moore v. British Columbia (Education)*. In this case the Supreme Court articulated the test to establish prima facie discrimination as being one which requires the claimant to show that the personal characteristic was “a factor” in the adverse treatment that they received. Previously the test that had been applied had been one which required the claimant to prove that the personal characteristic caused the adverse treatment, which is a significantly different test.

The BC Supreme Court had the opportunity recently to apply and comment on the test that arose from *Moore* in its decision in *Vancouver Area Network of Drug Users v. British Columbia Human Rights Tribunal* 2015 BCS 534. The claimant was an advocacy group comprised of current and former drug users which was dedicated to improving the lives of illicit drug users through peer support and education. The respondent was an organization dedicated to helping Vancouver business revitalize the com-

munity. They implemented a program that was meant to actively dissuade homeless persons in the downtown core from occupying public spaces. The claimant alleged that the program discriminated against street homeless and drug addicted persons who were disproportionately aboriginal and mentally or physically disabled. It fell to the claimant to establish a prima case of discrimination.

The Human Rights Tribunal, in considering the case, applied the test for prima facie discrimination and dismissed the case on the grounds that it found that the claimant had not provided sufficient evidence to establish a causal nexus between the adverse treatment and the protected grounds, the third branch of the test. The claimant appealed the Tribunal’s decision to the BC Supreme Court. The BC Supreme Court found that the Tribunal had been in error in requiring the claimant to establish a causal connection between the adverse treatment and the protected grounds. The test that the Court said was to be applied, was that established by the Supreme Court of Canada in *Moore*. That test was significantly different and required the claimant to establish only that the personal characteristic was “a factor” in the adverse treatment. The Court found that the test was satisfied, noting that the discrimination analysis focuses on the impact of the conduct in the dispute and intent is of minimal, if any, relevance. The Court concluded that a prima facie case of discrimination existed and returned the case to the Tribunal for a determination of whether the prima facie discrimination was justified.

This decision, as well as the *Moore* decision, will make it significantly harder for respondents to have complaints dismissed on a preliminary basis. If the first two branch-

es of the test are established, being that there is adverse treatment and that the complainant has a characteristic that is a protected ground, it will be extremely diffi-

cult to establish that the treatment was not “a factor” in the adverse treatment when the causal connection is not a relevant consideration.

## Loss of Future Income Earning Capacity

Does the fact that a plaintiff earns more money following injury in an accident mean that they are not entitled to an award for loss of earning capacity? In the recent case of *Geadreault v. Gobeil* 2015 BCSC 483 the Court once again confirmed that earning more money subsequent to injury does not disentitle a plaintiff from an award for loss of earning capacity. This fact is obviously a factor which will be taken into consideration in assessing whether there has been a loss of earning capacity and the quantum that is awardable, however the fact of increased earnings itself will not necessarily disentitle the plaintiff to an award. In *Geadreault* the plaintiff was 43 years old at the time of injury. At the time of the accident the plaintiff owned a residential building company and was involved in both the management and the physical aspects of the business. The business failed financially and went out of business prior to the trial. At the time of trial the plaintiff was working as a site supervisor and earning more than he had when he had his own business.

In awarding \$125,000 for loss of earning capacity the judge found that the medical evidence established that the plaintiff as a result of his motor vehicle accident related injuries was now in a position where he ought not to do physical construction work. The judge found that there was a 50% risk that even without the accident within ten years the pre existing degenerative changes in the plaintiff’s shoulder

would have progressed to the point that they interfered with the plaintiff’s ability to do heavy work. Despite the fact that the plaintiff was now earning more money than he had earned prior to the accident the loss of the ability to continue to do the physical tasks associated with the construction work himself had damages his capital asset of income earning ability and would likely make him less attractive to potential employers. The plaintiff had also lost the fall back ability to seek out work “on the tools” in the event of unemployment as a project manager.

Other recent decisions regarding loss of future income earning capacity include the following:

*Chenier v. Szili* – a 61 year old who owned an excavating and demolition business and who personally worked with the crew on project sites was awarded \$230,000 for loss of income earning capacity. The judge found that his injury prevented him from being able to safely perform the moderate to heavy demolition work that he did prior to the accident and that he was now limited to sedentary to light duty work. The judge found that there were obvious real limitations to his working ability due to the motor vehicle accident injuries and that his injuries rendered him less capable overall from earning income from all types of employment, he was less marketable or attractive as an employee to potential employers and he had lost the ability to take advantage of all job opportunities which oth-



erwise might have been open to him had he not been injured.

*Kaiser v. Williams* – a 24 year old PHD student was awarded \$420,000 for loss of earning capacity following a finding that the injuries suffered in a car accident resulted in a 2 year delay in the completion of her education. The injuries also resulted in an ongoing limitation on her ability to work full time.

*Singh v. Wu* 2015 BCCSC 526 - \$150,000 for loss of earning capacity was awarded to a 33 year old male plaintiff who had been injured in a motor vehicle accident five years prior to trial. The judge found that

the plaintiff had been rendered less capable overall from earning income from all types of employment, particularly employment that entailed physically demanding work. The judge found that while he may be able to continue to work in the restaurant industry, his ability to perform the physical demands of a full time chef was reduced. As a result of this, he had lost the ability to take advantage of all job opportunities that might otherwise have been available to him had he not been injured. He was less marketable or attractive as an employee to all potential employers and less capable of earning income in a competitive labour market.

## What happens when an offer of employment is revoked?



A recent British Columbia Supreme Court decision *DeGagne v. Williams Lake (City)*, 2015 BCSC 816 demonstrates the consequences to an employer when they revoke an offer of employment prior to the commencement of employment. The plaintiff had been offered the position of Chief Administrative Officer with a start date of March 1. He was provided with an offer letter that stated that the first six months of his employment would be probationary, during which time his employment could be terminated with provision of one months notice. The agreement also provided that if his employment were terminated during the first year of his employment he would be provided with six months notice.

Within a week of his start date the City received information which made them reconsider taking the plaintiff on as an employee. They decided to not proceed. The litigation before the BC Supreme Court was

to determine what damages, if any, he was entitled to as a result of the City not proceeding with the offer of employment.

In determining that the plaintiff was entitled to the earnings that he would have had in 6 months of employment, the trial judge held that the probationary employment provisions did not apply as the plaintiff had not commenced work. A plain reading of the employment agreement provided for provision of six months notice. The trial judge also held that applying the common law principles of notice in the event that the agreement were not enforceable would still result in a payment of six months. The judge came to this conclusion after considering the plaintiff's age of 57, his 25 years of experience as a local government administrator and his relocation for the position.

## Injunction Against Smoking

An injunction is in simple terms where a court orders that something can or cannot be done. An interesting recent decision involved an application for an injunction prohibiting smoking. In *Bonavista Management Ltd. v. Absolute Star Design Ltd.* 2015 BCSC 1002 the plaintiff was a property manager as well as various tenants of a commercial building. The defendant was one of the tenants of the building. Over the years the defendant's jewelry business had changed to focus more on cigar sales. As well, over the years, the plaintiff had received more and more complaints from other tenants of the building about smoking in and around the defendant's rented premises of cigars and cigarettes. The plaintiff property manager had asked the defendant on numerous occasions to cease this activity, to no avail. This led to the application to the court for an injunction preventing the defendant from allowing smoking on its premises.

The Court granted the injunction and had the following to say:

The emission of cigar smoke and cigar fumes from the defendants' unit unreasonably interfered with the use and enjoyment of rental units by the plaintiffs. Since it constituted a nuisance and was also in violation of the municipal smoking regulation bylaw, the defendant was in violation of the terms of its

lease. Because the emanation of smoke had continued despite the defendants having been repeatedly asked to stop the smoking activity, damages would not be an adequate remedy. The balance of convenience favoured the granting of a permanent injunction restraining the defendants, their employees and customers from smoking cigars or any tobacco or marijuana products at he rented business premises.

The decision is the first of its kind that I have noticed. It is illustrative of the complete culture change around smoking that we have experienced in British Columbia in the last ten years. It was not that long ago that there were smoking sections inside restaurants and that smoking in bars was a common occurrence. It will be interesting to continue to follow this case as the injunction is not likely to be the last occurrence in this case. If the defendants were refusing to follow a rule it is unlikely that they will follow the terms of an injunction. An injunction however will give the plaintiff property manager more power to enforce the prohibition against smoking and will likely provide the property manager with the ammunition to end the tenancy and to seek damages against the defendant.



### Our Mission

At Rose Keith Law Corporation our mission is to exceed the expectations of our clients by:

- Responding promptly
- Managing all matters in an efficient, caring and proactive manner
- Communicating clearly and regularly
- Doing all things with an aim to achieving the end result desired by our clients

## Seeking Losses in Employment Constitutes Constructive Dismissal

An interesting decision on constructive dismissal was recently released. In *Rothberger v. Concord Excavating & Contracting Ltd.* 2015 BCSC 729 a seasonal employee was found to have been constructively dismissed after the employee indicated that “future losses would be deducted from their pay check”. Constructive dismissal requires a finding that there has been a material change to the employment contract. The trial judge found that material change to exist when the employer suggested that future losses would result in a deduction of his paycheck. This was a material change from the employee’s right to receive an hourly wage for hours worked.

The judge found that the employee was entitled to treat the employment contract as at an end due to the combined effect of the employer’s stated intent to deduct future losses and their unwillingness to address the employee’s concerns in a civil and respectful manner.

A finding of constructive dismissal in practice is akin to a finding that a without cause termination has occurred. Such a finding results in a determination of the length of time that would be considered to be reasonable notice and an award of damages. In this case, the plaintiff was a seasonal excavator operator. He was paid on an hourly basis and worked from 2001 to 2012 on a seasonal basis. The judge held that the seasonal nature of his work did not mean that he was not a full time, long term employee. The plaintiff had fully mitigated his losses five months after being terminated. The judge found that reasonable notice in the circumstances would have been six months but due to mitigation efforts the employee would only recover damages for the five month time period. In assessing damages the judge noted the seasonal nature of the plaintiff’s work as well as the unavailability of the precise number of hours he lost as a result of his dismissal. The judge assessed damages based on lost employment at 40 hours per week.

## Assessment of Personal Injury Claims



A personal injury claim is meant to put a plaintiff in the position that he or she was in prior to injury. The assessment involves considering what the individual’s pre accident condition was and comparing this to post accident. A secondary assessment of causation is then necessary as the plaintiff is only entitled to compensation for those injuries and losses that were caused by the accident. In most cases, the evidence of injury and the impact of that injury relies in large part on the testimony of the plaintiff of their experience. There is no objective test to measure pain; rather judges are reliant on the plaintiff’s explanation and description of their experience of pain.

Because of this reliance on the plaintiff’s

description of their experience the courts have frequently pointed out the necessity to be exceedingly careful in assessing personal injury claims when there is little or no objective evidence of continuing injury and where complaints of pain persist for long period extending beyond the normal or usual recovery. This direction was recently applied in a British Columbia Supreme Court case, *Espinoza v. Espinoza* 2015 BCSC 762. In this case the court rejected the plaintiff’s portrayal of the amount of pain and suffering he had experienced since the accident after applying this principle. The court noted that there were a number of inconsistencies in the plaintiff’s evidence and the expert evidence. The court also found that the plaintiff had been very in-

consistent in pursuing any course of therapy or rehabilitation.

This decision and the decisions instructing the judges in the manner in which they must assess personal injury claims, provide the framework for understanding that it is not simply a plaintiff's testimony of their experience that will drive the determination of the award of damages following an injury. Rather the court will assess that evidence in the broader context of the evidence as a whole. Is the evidence consistent with the other evidence regarding

nature and extent of injury? Is the evidence consistent with the expected course of action following such an injury? Is the evidence consistent with what is known about the nature of the injury? If the evidence is not consistent with any of these things it will be more closely analysed and in many circumstances will result in a finding that the plaintiff's evidence must be rejected. These decisions aid in an understanding of the circumstances when a plaintiff's evidence will be rejected and the factors that go into that decision.

## Duty of Care of Bus Drivers

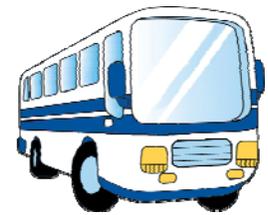
Bus drivers are professional drivers and they are responsible for the safety of many individuals on a daily basis. Our courts hold bus drivers to a higher standard of care as a result of this. This higher standard of care results in a different test for determining if the driver will be liable for injuries suffered by passengers on buses. The test applied by the court is first whether the plaintiff has established a prima case face of negligence. If they have done so the burden then shifts to determine whether the bus driver can establish that the plaintiff's injuries were caused without negligence on their part or from a cause for which they were not negligent.

This duty of care was recently applied in the case of *Hutchison v. Dyck* 2015 BCSC 1039. In this case the plaintiff was sitting at the back of the bus when all of a sudden he felt his seat give out below him, felt himself go into the air and then crash back down on the seat. The motion resulted in a fractured vertebrae in his back. The evidence established that the injury happened when the bus went through a dip in the road. In analysing whether the bus driver was liable for the injuries suffered the trial judge said as follows:

The plaintiff was ejected from his seat on the bus while simply sitting there

and minding his own business. He was injured as a result and had proven a prima facie case of negligence against the defendants. The analysis shifted to whether the defendants had established that the plaintiff's injuries were caused without negligence or from a cause for which the carrier was not responsible. The defendant bus driver owed the plaintiff a duty of care. When the accident occurred he was travelling faster than he thought on a stretch of road he knew contained a dip. He was going too fast to fully appreciate how significant a dip it was and too fast to take evasive action and brake to minimize the impact once he saw the dip. The defendants had not shown the driver conducted himself in a reasonable and careful manner consistent with the high duty of care imposed on those engaged in public transit and the defendants were negligent.

This decision demonstrates the high standard that public carriers are held to and the different test for liability that is applied in cases considering the liability of bus drivers for injuries sustained by their passengers



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### NOTABLE QUOTES

The difference between ordinary and extraordinary is that little “extra”.

*Jimmy Johnson – American football coach*

Faith is taking the first step even when you don't see the staircase.

*Martin Luther King Jr.*

If you can give your son or your daughter only one gift, let it be enthusiasm.

*Bruce Barton*

We must take change by the hand or rest assuredly, change will take us by the throat

*Winston Churchill*

Success is the maximum utilization of the ability that you have

*Zig Ziglar*

Time flies. It's up to you to be the navigator.

*Robert Orben*

We all die. The goal isn't to live forever, the goal is to create something that will.

*Chuk Palahniuk*

### OUR AREAS OF PRACTICE

Depending on your experience with our office you may or may not be aware of the types of problems that we routinely assist clients with. We have experience assisting clients with the following types of problems:

- injuries resulting from motor vehicle accidents
- injuries resulting from slips and falls
- injuries resulting from sexual abuse
- loss of employment
- discrimination and harassment
- damages resulting from breach of contract

Referrals in any of the above areas are welcome. If you have friends or family that require legal assistance, please refer them to our office. If we are unable to help them we usually know someone who is able.



# ROSE KEITH

## TRIAL LAWYER