

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

CITY OF TORONTO

Applicant

and

**LANOVA OUTSOURCING CORP., PHYTOS APOTHECARY AND WELLNESS
CENTRE, IMOSH ONTARIO LTD., NADINE GORODKOV, IVAN NOE
GORODKOW-ACHILKOWSKI, TALON TAPES INDUSTRIES LTD., JACQUES
ONTARIO LTD., LUIS EPSTEIN, NIKOLITA TCHOUPEVA, PETER MENAS,
ANASTASIA MENAS, SUE YOUNG, MURRAY YOUNG, JOAN YEE BRAN AND
JMI DUNDAS INC.**

Respondents

BETWEEN:

**PHYTOS APOTHECARY AND WELLNESS CENTRE *and*
GRASSROOTS NATURAL HEALTH SOCIETY**

Applicants

and

CITY OF TORONTO *and* ATTORNEY GENERAL OF CANADA,

Respondents

**FACTUM OF THE RESPONDENTS/APPLICANTS,
PHYTOS APOTHECARY AND WELLNESS CENTRE &
GRASSROOTS NATURAL HEALTH SOCIETY, IMOSH ONTARIO LTD.,
IVAN NOE GORODKOW-ACHILKOWSKI AND THE RESPONDENTS,
LANOVA OUTSOURCING CORP. & NADINE GORODKOV**
