

IN THE SUPREME COURT OF CANADA
(ON APPEAL FROM THE COURT OF APPEAL FOR ONTARIO)

BETWEEN:

KULDEEP KAUR AHLUWALIA

APPELLANT
(Respondent)

AND:

AMRIT PAL SINGH AHLUWALIA

RESPONDENT
(Appellant)

AND:

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PROJECT

INTERVENERS

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PART I – OVERVIEW

1. Intimate partner violence (“IPV”) is a widespread form of family violence that has devastating, long-term, and sometimes deadly consequences. It encompasses physical abuse, sexual violence, emotional and psychological abuse, economic abuse, and coercive control and disproportionately harms the safety and well-being of women and children.¹ Despite legislative efforts to deter IPV and mitigate its effects, survivors of IPV struggle to access justice: this Court has recognized that IPV remains “notoriously difficult to prove”.²
2. Myths and stereotypes about IPV – harmful and discriminatory assumptions about IPV – (“IPV Myths & Stereotypes”) commonly affect family law and related tort proceedings (“Family Claims”). Indeed, they are evident in the record in this appeal. IPV Myths & Stereotypes undermine the rule of law and substantive equality. Like myths and stereotypes about sexual assault,³ IPV Myths & Stereotypes harm trial fairness, impede accurate fact determination, jeopardize survivors’ legal rights, and interfere with the assessment of appropriate remedies.
3. This Court has yet to fully address IPV Myths & Stereotypes in Family Claims. This appeal presents the Court with the opportunity to do so. West Coast Legal Education and Action Fund Association and Rise Women’s Legal Centre (the “Intervenors”) invite the Court to:
 - a. recognize that IPV Myths & Stereotypes are analogous to myths and stereotypes about sexual assault;
 - b. prohibit IPV Myths & Stereotypes – including those that may be embedded in the common law – from operating in Family Claims (the “Prohibition”); and
 - c. apply the Prohibition in determining whether to recognize a tort of family violence (the “Tort”).

¹ Government of Canada, “[Fact Sheet: Intimate partner violence](https://www.canada.ca/en/women-gender-equality/gender-based-violence/intimate-partner-violence.html)” (31 July 2024), online: <<https://www.canada.ca/en/women-gender-equality/gender-based-violence/intimate-partner-violence.html>>.

² *Barendregt v Grebliunas*, [2022 SCC 22](#) (“*Barendregt*”), at paras. 144-145.

³ *R v Kruk*, [2024 SCC 7](#) (“*Kruk*”), at paras. 42-43.

PART II – STATEMENT ON POINTS IN ISSUE

4. The Interveners take no position on the disposition of the appeal but argue that the Court should endorse a comprehensive Prohibition on IPV Myths & Stereotypes in Family Claims, and apply the Prohibition in deciding whether to recognize the Tort.

PART III – STATEMENT OF ARGUMENT

A. The Gendered Nature and Harms of IPV Myths & Stereotypes

i. IPV Myths & Stereotypes are discriminatory fictions

5. The phrase “myths and stereotypes” describes widely held beliefs or ideas that are not empirically true but are rooted in discrimination and inequality of treatment.⁴ This Court has primarily addressed myths and stereotypes in the criminal law context, holding that they perpetuate the view that women, as a group, are less worthy of belief and legal protection against sexual violence.⁵ The same is true of IPV Myths & Stereotypes: they perpetuate the view that women’s claims about IPV should be treated with suspicion and that courts hearing Family Claims should be parsimonious with remedies for IPV.
6. IPV Myths & Stereotypes disparage survivors’ credibility and reliability. They also obfuscate the gendered nature and harms of IPV. They include: women lie about or exaggerate family violence to gain an upper hand in litigation⁶ or because they are vengeful⁷ or “hysterical”;⁸ IPV is uncommon;⁹ IPV flows from mutually blameworthy conduct and occurs in “high

⁴ *Kruk*, *supra* note 3, at paras. 37 and 49; *K.M.N. v S.Z.M.*, [2024 BCCA 70](#) (“*K.M.N.*”), at para. 110, citing Jennifer Koshan, “[Challenging Myths and Stereotypes in Domestic Violence Cases](#)” (2023) 35:1 *Can J of Fam L* 33 (“*Koshan 2023*”), at 38-39.

⁵ *Kruk*, *supra* note 3, at para. 31.

⁶ *K.M.N.*, *supra* note 4, at paras. 120 and 124-127; [Koshan 2023](#), *supra* note 4, at 41-43; Linda Neilson, “[Responding to Domestic Violence in Family Law, Civil Protection and Child Protection Cases](#)”, 2nd ed, (2020) 2017 CanLII Docs 2 (“*Neilson*”), at 4.5.2.

⁷ *R v Cassell*, 2023 CanLII 104340, 2023 NLPC 1323A00118, at para. 15; *R v MacDonald*, 2022 ABPC 255, at paras. 59-60.

⁸ Deanne Sowter and Jennifer Koshan, “Weaponizing” The Tort of Family Violence? Myths, Stereotypes, Lawyers' Ethics and Access to Justice” (12 November 2024), online: <<https://ssrn.com/abstract=5018397>> (“*Sowter & Koshan 2024*”), at 33-34; Suzanne Zaccour, “[Crazy Women and Hysterical Mothers: The Gendered Use of Mental-Health Labels in Custody Disputes](#)” (2018) 31:1 *Can J Fam L* 57 at 58-59, 102-103.

⁹ [Sowter & Koshan 2024](#), *supra* note 8, at 38.

conflict” relationships;¹⁰ IPV is only serious where it causes physical harm and, conversely, non-physical IPV often will not warrant legal intervention;¹¹ IPV’s legal relevance lies in discrete events, rather than patterns of behaviour;¹² IPV does not harm children or bear on parenting ability;¹³ and the benefits of conciliation, resolution, and co-parenting will tend to outweigh remedies for IPV.¹⁴ IPV Myths & Stereotypes also suggest that “true” survivors leave abusive relationships;¹⁵ disclose IPV early;¹⁶ report IPV to the police or other authorities (such as doctors);¹⁷ present as victimized, passive, helpless, and dependent;¹⁸ and give clear, consistent and detailed evidence, regardless of the trauma or stress they have endured.¹⁹

7. IPV Myths & Stereotypes disproportionately harm survivors with intersecting identities, such as Indigenous women, racialized women, women with disabilities, and members of the 2SLGBTQ+ community, due to the effects of compound stereotyping. Black women, for example, are susceptible to racist and gendered stereotypes that paint them as aggressors rather than as idealized victims.²⁰

ii. IPV Myths & Stereotypes undermine trial fairness and just outcomes

8. Jennifer Koshan aptly describes how IPV Myths & Stereotypes tend to affect the adjudication of Family Claims:²¹

¹⁰ [Koshan 2023](#), *supra* note 4, at 52.

¹¹ [Koshan 2023](#), *supra* note 4, at 52. Wendy Chan & Rebecca Lennox, “[This Isn’t Justice’: Abused Women Navigate Family Law in Greater Vancouver](#)” (2023) 35:1 *Can J Fam L* 81 (“Chan & Lennox 2023”) at 102, 110, 120-122, 124.

¹² [Ahluwalia v Ahluwalia](#), 2022 ONSC 1303 (“*Ahluwalia ONSC*”), at para. 59; [Sowter & Koshan 2024](#), *supra* note 8, at 39.

¹³ [Koshan 2023](#), *supra* note 4, at 52-53; [Barendregt](#), *supra* note 2, at para. 143.

¹⁴ [Costantini v Costantini](#), 2013 ONSC 1626, at para. 22; [Koshan 2023](#), *supra* note 4, at 52-53.

¹⁵ [R v Lavallee](#), [1990] 1 SCR 852, 1990 CanLII 95 at 872-873; [Ahluwalia ONSC](#), *supra* note 12, at paras. 63 and 65; [Barreto v Salema](#), 2024 ONSC 4972 (“*Barreto*”), at para. 166.

¹⁶ [Ahluwalia ONSC](#), *supra* note 12, at para. 94; [Barreto](#), *supra* note 15, at para. 166.

¹⁷ [Ahluwalia ONSC](#), *supra* note 12, at para. 63; [Barreto](#), *supra* note 15, at para. 166.

¹⁸ [R v Malott](#), [1998] 1 SCR 123, 1998 CanLII 845 (“*Malott*”), at para. 40.

¹⁹ [Johnston v Da Silva](#), 2023 ONSC 2710, at para. 14.

²⁰ [Malott](#), *supra* note 18, at para. 40; [Sowter & Koshan 2024](#), *supra* note 8, at 31.

²¹ [Koshan 2023](#), *supra* note 4, at 56.

If survivors' claims about the nature and harms of domestic violence do not accord with the assumptions of decision-makers, their claims may be seen as non-credible, and if their credibility is impugned based on the range of misassumptions about survivors, the domestic violence may be seen as unlikely. In other instances, even if claims of domestic violence are believed, courts and other legal actors may erroneously find that the violence has little relevance to the legal issues in dispute, even in spite of legislative directives to the contrary.

9. IPV Myths & Stereotypes affect Family Claims in the pre-hearing, hearing, decision, and post-decision stages of litigation.
10. Where they surface in interlocutory applications, questioning or submissions in the litigation of Family Claims, IPV Myths & Stereotypes can retraumatize and revictimize survivors, impairing equitable access to justice.²²
11. When IPV Myths & Stereotypes creep into courts' decision-making, they distract from the evidence, artificially diminish survivors' credibility, and prevent accurate fact determination. In turn, survivors' access to protective remedies and fair damages for injury are jeopardized. Moreover, where a survivor's evidence about IPV is not believed, due to IPV Myths & Stereotypes, this can impinge their credibility more generally and hinder access to other relief, such as appropriate support orders and equitable property division. The effect of this is to put survivors at risk of further violence and hinder their ability to live full and equal lives.²³
12. For survivors who must continue to engage with their abusers – for example, due to co-parenting – IPV Myths & Stereotypes can be a recurring problem. Survivors who need to return to court intermittently to address evolving safety issues may be stereotyped as “high conflict” litigants, and may not receive appropriate remedies. Abusers may also use the litigation process to perpetuate IPV, such as through vexatious court applications, but IPV Myths & Stereotypes may prevent courts from seeing the litigation abuse.²⁴ Some survivors who have felt victimized by the court system may simply abandon their legal rights rather

²² [Koshan 2023](#), *supra* note 4, at 57; [Sowter & Koshan 2024](#), *supra* note 8, at 35.

²³ [Koshan 2023](#), *supra* note 4, at 57; [Sowter & Koshan 2024](#), *supra* note 8, at 35.

²⁴ Haley Hrymak and Kim Hawkins, “[Why Can't Everyone Just Get Along?](#)” (Vancouver: Rise Women's Legal Centre, 2021), (“Hrymak & Hawkins”) at 30-36; [Neilson](#), *supra* note 6, at 7.4.

than submitting themselves to further proceedings.²⁵

iii. *IPV Myths & Stereotypes are evident in the case on appeal*

13. The trial judge in this case admonished the Respondent’s reliance on IPV Myths & Stereotypes. The judge rejected the Respondent’s suggestions that the Appellant was not believable because she: was too educated; immigrated to Canada with the Respondent after the violence started; did not report the abuse to the police during the relationship; only disclosed her abuse to doctors and counsellors after the Respondent threatened her with divorce; did not leave the relationship soon enough; was vengeful; was motivated by financial gain; did not properly plead her tort claim until several years after separation; and was cast in a movie about IPV. The judge similarly rejected the Respondent’s arguments that the tort claim was improper because it would “derail the trial process” and prevent a co-parenting relationship.²⁶ Despite her sensitivity to IPV Myths & Stereotypes in the Respondent’s advocacy, however, the judge perpetuated a myth by unjustifiably describing the IPV in the case as “rare and unusual”.²⁷
14. The Ontario Court of Appeal corrected the trial court’s misconception about the uniqueness of the Appellant’s experiences by confirming the widespread nature of IPV,²⁸ but also drifted into its own myth-based reasoning by finding that the Tort should not be endorsed because it could undermine “a resolution-based system” and encourage the assertion of claims for tactical reasons.²⁹ This reasoning echoes the IPV Myths & Stereotypes that women lie about IPV to secure advantages in litigation or that the law should, in any event, prioritize conciliation and co-parenting over responding to IPV.³⁰

iv. *IPV Myths & Stereotypes continue to affect the adjudication of Family*

²⁵ Deanne Sowter, “[Intimate Partner Violence and Ethical Lawyering: Not Just Special Rules for Family Law](#)” (2024) 102 *Can Bar Rev* 130 (“Sowter 2024”) at 138-139; [Hrymak & Hawkins](#), *supra* note 24, at 34, [Neilson](#), *supra* note 6, at 9.2.2.29.

²⁶ [Ahluwalia ONSC](#), *supra* note 12, at paras. 28, 36, 40, 65, 74, 94, and 115.

²⁷ [Ahluwalia ONSC](#), *supra* note 12, at para. 5. See also, [Sowter & Koshan 2024](#), *supra* note 8, at 4 and 38.

²⁸ [Ahluwalia v Ahluwalia](#), 2023 ONCA 476 (“*Ahluwalia ONCA*”), at para. 1.

²⁹ [Ahluwalia ONCA](#), *supra* note 28, at paras. 120-122.

³⁰ [Sowter & Koshan 2024](#), *supra* note 8, at 38-39.

Claims, more generally

15. Inconsistent treatment of IPV Myths & Stereotypes is evident in other cases. For example, in *Barendregt*, the BC Court of Appeal minimized the impacts of IPV on the best interests of the child. On appeal, this Court rejected the suggestions that exposure to IPV does not affect children and has nothing to do with the perpetrator’s parenting ability.³¹
16. Subsequently, in *K.M.N.*, the BC Court of Appeal cited the existence of IPV Myths & Stereotypes when it admonished the trial judge for accepting “at least in part”, and without evidence, that the mother had lied about abuse to secure an advantage in the litigation. The Court described reliance on this myth as a reversible error.³²
17. In *Shipton v Shipton*, the Ontario Court of Appeal did not use the language of myths and stereotypes but rebuked the trial judge for expressing “disdain” and using a “mocking and inflammatory tone” towards the mother’s evidence of abuse. The Court held that the trial judge had unreasonably concluded that the mother had used this evidence to “manipulate the court process.”³³
18. This recent case law shows increasing judicial sensitivity to IPV Myths & Stereotypes, but that courts also continue to fall prey to them. The Interveners submit it is time for this Court to provide binding guidance to all courts to prohibit the influence of IPV Myths & Stereotypes in Family Claims.

B. The Court Should Endorse the Prohibition

19. To address the harmful effects of Myths & Stereotypes in Family Claims, the Interveners invite the Court to endorse the Prohibition and confirm the following propositions. First, courts hearing Family Claims must guard against the invocation of IPV Myths & Stereotypes in proceedings. Second, it is an error of law for courts to rely on IPV Myths & Stereotypes in deciding Family Claims. Third, the common law – including tort law – must not perpetuate

³¹ *Barendregt v Grebliunas*, 2021 BCCA 11, at paras. 70-72; *Barendregt*, *supra* note 2, at para. 143.

³² *K.M.N.*, *supra* note 4, at paras. 110-127.

³³ *Shipton v Shipton*, 2024 ONCA 624, at paras. 60-63, 77, and 81.

IPV Myths & Stereotypes; rather, the law should be adjusted, as necessary, to eradicate them.

20. In advocating for the Prohibition, the Interveners draw inspiration from *Kruk*. To promote truth-seeking and eliminate the unequal treatment of women in the justice system, *Kruk* affirmed a prohibition on gendered myths and stereotypes in the adjudication of sexual assault cases. *Kruk* additionally recognized that other discriminatory myths and stereotypes should be prohibited at law.³⁴
21. IPV Myths & Stereotypes are analogous to – and indeed, often essentially the same as – myths and stereotypes about sexual assault. Both are linked to social tolerance of gender-based violence and discrimination. Historically, both were exemplified by legal doctrines that denied women the protection of the law, such as, in the case of IPV, interspousal immunity and coverture.³⁵ Both have similar effects: by denying, minimizing, or justifying allegations of abuse, the myths and stereotypes entrench inequality, allow abusers to escape liability, and permit gender-based violence to continue without any or adequate legal response.³⁶
22. The law affirmed in *Kruk* and the Prohibition have similar objectives: to remedy discrimination. They are both underpinned by the constitutional imperatives of substantive equality and human dignity.³⁷ As observed by Justice L’Heureux-Dubé, writing extra-judicially, all myths and stereotypes about violence against women are incompatible with substantive equality and justice.³⁸
23. Turning to the first aspect of the Prohibition, the Interveners submit that judges hearing Family Claims should recognize IPV Myths & Stereotypes and expunge them from court processes. As guardians of hearing fairness, judges should correct litigants and counsel who attempt to rely on IPV Myths & Stereotypes in advocacy, and should be alert to the potential

³⁴ *Kruk*, *supra* note 3, at paras. 45, 54, and 57.

³⁵ *Sowter & Koshan 2024*, *supra* note 8, at 3, 24.

³⁶ *Sowter & Koshan 2024*, *supra* note 8, at 31; Justice Claire L’Heureux-Dubé, “Beyond the Myths: Equality, Impartiality, and Justice” (2001) 10:1 *Journal of Social Distress and Homelessness* 87 (Book of Authorities of the Interveners West Coast Legal Education and Action Fund Association and Rise Women’s Legal Centre Tab 1) (“Justice L’Heureux-Dubé 2001”), at 89-90.

³⁷ *Kruk*, *supra* note 3, at para. 42; *R v A.G.*, 2000 SCC 17, at para. 1.

³⁸ Justice L’Heureux-Dubé 2001, *supra* note 36, at 88-89 and 97-98.

for IPV Myths & Stereotypes to influence pre- and mid-trial rulings on matters such as admissibility objections. These safeguards are necessary because when IPV Myths & Stereotypes infiltrate the trial process, survivors are retraumatized, legal and factual issues become distorted, and the court may be misled.³⁹

24. The second aspect of the Prohibition flows from the first: this Court should affirm that it is an error of law for courts to rely on IPV Myths & Stereotypes in deciding Family Claims. Reliance on myths and stereotypes in judicial reasoning undermines the rule of law and jeopardizes survivors' rights to security, dignity, substantive equality, and justice.⁴⁰
25. The third aspect of the Prohibition is corollary to the first two. Just as IPV Myths & Stereotypes should be banned from the hearing room and should not be permitted to influence the evaluation of evidence, they must be eliminated from the fabric of common law, including the law of tort. To that end, and consistent with the obligation to align the common law with *Charter* values, this Court should ensure that tort law evolves in a way that does not perpetuate, but rather removes, the influence of IPV Myths & Stereotypes.⁴¹

C. The Court should apply the Prohibition in deciding whether to recognize the Tort

26. This appeal asks the Court to decide, *inter alia*, whether existing torts are inadequate to survivors' needs.⁴² The Prohibition can assist with this task by illuminating the extent to which tort law currently incorporates or remains prone to the influence of IPV Myths & Stereotypes. The Interveners submit that the Court should invoke the Prohibition to determine whether the existing law can be modified or should be supplemented by the Tort.
27. Battery, assault, and intentional infliction of emotional distress ("IIED") are the torts most often applied to IPV, and were the causes of action at issue in the case on appeal. The first two capture physical violence and the threat thereof, while IIED captures any conduct that is

³⁹ [Sowter & Koshan 2024](#), *supra* note 8, at 35; [Sowter 2024](#), *supra* note 25, at 142.

⁴⁰ [Kruk](#), *supra* note 3, at para. 44.

⁴¹ [Hill v Church of Scientology of Toronto](#), 1995 CanLII 59, [1995] 2 SCR 1130 at paras. 91 and 206.

⁴² [Nevsun Resources Ltd. v Araya](#), 2020 SCC 5 at para. 237 (per Brown & Rowe JJ, dissenting in part).

specifically intended to cause mental injury to the Plaintiff.⁴³

28. Battery, assault and IIED assess different aspects of IPV against different legal standards.

While battery is actionable with proof of “non-trivial” physical contact⁴⁴ and assault is made out if the defendant creates an imminent apprehension of such contact,⁴⁵ IIED requires the defendant’s conduct to be “flagrant and outrageous.”⁴⁶ The higher threshold of tortious conduct to establish IIED suggests that, unlike IPV that threatens bodily integrity, IPV that is calculated to cause psychological harm, such as coercive control or chronic belittling, will not attract a remedy unless it is extreme or exceptional. That battery and assault are actionable *per se*, while IIED requires proof of mental injury, only serves to underline tort law’s differential treatment of different aspects of IPV.

29. In Family Claims, the disparate legal standards for battery and assault, on the one hand, and IIED, on the other, perpetuate IPV Myths & Stereotypes. These include the interrelated and mutually reinforcing beliefs that “serious” IPV causes physical harm and that other forms of abuse are of lesser legal concern. Flowing from these beliefs, courts may subject evidence of non-physical IPV to heightened suspicion or skepticism, minimize it, or misattribute its harms to a high conflict relationship or post-separation emotionality. Relatedly, courts may consider a degree of psychological harm to be a normal, if undesirable, consequence of relationship breakdown and make decisions on the assumption that the legal system should prioritize conciliation and resolution over claims for damages in tort. Courts may perceive survivors who pursue damages for non-physical IPV as manipulative or as seeking a tactical advantage in their Family Claim.⁴⁷

30. Additionally, the legal siloing of survivors’ experiences of IPV into claims for battery, assault and IIED invites courts to take a patchwork and incident-based approach to assessing IPV’s harms. The notion that the legally salient aspects of IPV are discrete incidents of abuse

⁴³ [Ahluwalia ONCA](#), *supra* note 28, at paras. 61 and 69-70.

⁴⁴ [Non-Marine Underwriters, Lloyd’s of London v Scalera](#), 2000 SCC 24 at para. 16.

⁴⁵ [Barker v Barker](#), 2022 ONCA 567, at paras. 138, 170-171; [McLean v McLean](#), 2019 SKCA 15, at para 59, [M.\(K.\) v M.\(H.\)](#), 1992 CanLII 31, [1992] 3 SCR 6 at 25-26.

⁴⁶ [Prinzo v Baycrest Centre for Geriatric Care](#), 2002 CanLII 45005 (ONCA), at para. 48.

⁴⁷ [Sowter & Koshan 2024](#), *supra* note 8, at 30 and 39.

is a pernicious myth that minimizes and misunderstands the effects of IPV. It is deficient in as much as it fails to encompass the cumulative harms of patterns of abuse. It promotes a myopic focus on those incidents of IPV that are most dramatic, and thus the easiest to “see” and prove (often those causing physical injury), while overlooking the connective tissue of IPV: the less spectacular forms of violence that are integral to IPV’s grinding nature. It also distracts from the gendered dynamics of power, dominance and control that propel patterns of IPV and exacerbate their harms.⁴⁸


31. To the extent that tort law reinforces the foregoing IPV Myths & Stereotypes, it obscures the essential nature and harms of IPV. Like all gender-based violence, IPV is grounded in and perpetuates gendered abuses of power. Its core violation is to survivors’ substantive equality, dignity, and autonomy.⁴⁹ Of course, what tort law downplays or ignores is not compensated in damages, either adequately or at all.
32. IPV Myths & Stereotypes continue to lurk in Canadian tort law and to affect the adjudication of Family Claims. But law that embeds or is open to the influence of IPV Myths & Stereotypes is not just law. IPV Myths & Stereotypes are discriminatory. They undermine the rule of law. They interfere with access to justice. The Interveners therefore submit that this Court should recognize the Prohibition and refine the law of tort to guard against IPV Myths & Stereotypes.

PART IV – COSTS

33. The Interveners do not seek costs and ask that no costs be ordered against them.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

DATED at Vancouver, in the Province of British Columbia, this 3rd day of January 2025.



Monique Pongracic-Speier, KC, Kate Feeney,
Gita Keshava, Rosanna Adams

⁴⁸ [Sowter & Koshan 2024](#), *supra* note 8, at 28, 32, and 39.

⁴⁹ Justice L’Heureux-Dubé 2001, *supra* note 36, at 87-88.

PART V – TABLE OF AUTHORITIES

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14.	<i>Non-Marine Underwriters, Lloyd's of London v Scalera</i> , 2000 SCC 24	28
15.	<i>Prinzo v Baycrest Centre for Geriatric Care</i> , 2002 CanLII 45005 (ON CA)	28
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22.	<i>Shipton v Shipton</i> , 2024 ONCA 624	17

B. Secondary Sources:

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2.	Deanne Sowter and Jennifer Koshan, "Weaponizing" The Tort of Family Violence? Myths, Stereotypes, Lawyers' Ethics and Access to Justice” (November 12, 2024). Available at SSRN: https://ssrn.com/abstract=5018397	6, 7, 10, 11, 12, 13, 14, 21, 23, 29, 30
3.	Government of Canada, “ Fact Sheet: Intimate partner violence ” (31 July 2024), online: < https://www.canada.ca/en/women-gender-equality/gender-based-violence/intimate-partner-violence.html >	1
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5.	Jennifer Koshan, “ Challenging Myths and Stereotypes in Domestic Violence Cases ” (2023) 35:1 <i>Can J of Fam L</i> 33.	5, 6, 8, 10, 11
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