

COURT OF APPEAL FOR ONTARIO

CITATION: Stile Carpentry Ltd. v. 2004424 Ontario Inc., 2025 ONCA 669

DATE: 20250923

DOCKET: M56267 (COA-25-CV-1022)

Miller J.A. (Motion Judge)

BETWEEN

Stile Carpentry Ltd.

Applicant
(Appellant/Moving Party)

and

2004424 Ontario Inc.

Respondent
(Respondent/Responding Party)

Peter Paraskevopoulos, acting in person for the moving party

Jordan Diacur, for the responding party

Heard: September 18, 2025

REASONS FOR DECISION

[1] Stile Carpentry Ltd. seeks an extension of time to perfect an appeal of the judgment of Ohler J., dated June 27, 2025.

[2] Mr. Paraskevopoulos, who is not a lawyer, seeks leave to represent the corporation in this court, pursuant to r. 15.01(2) of the *Rules of Civil Procedure*, R.R.O 1990, Reg. 194. Mr. Paraskevopoulos is the father of the sole director of

the corporation, has represented Stile Carpentry in other proceedings, and has produced a shareholders' resolution authorizing him to act on behalf of the corporation.

[3] For the reasons given below, leave to represent the corporation in this appeal is refused.

Analysis

[4] Rule 15.01(2) provides:

A party to a proceeding that is a corporation shall be represented by a lawyer, except with leave of the court.

The starting point is that corporations must be represented by counsel. The grant of leave is exceptional. As Huscroft J.A. noted in *GlycoBioSciences Inc. (Glyco) v. Industria Farmaceutica Andromaco, S.A., de C.V. (Andromaco)*, 2024 ONCA 481, aff'd 2024 ONCA 760, at para. 6, although judges have a discretion to grant leave, that discretion must not be exercised in a way that normalizes the practice and undermines the rule.

[5] The effective operation of the legal system is premised on the participation of a well-trained and regulated body of professionals. A critical question, from the perspective of maintaining the integrity of the justice system, is whether a proposed representative is not only reasonably capable of comprehending the issues and setting out the position of the corporation, but also of advocating in a manner that meets the professional ethical standards expected of solicitors.

[6] Furthering access to justice can be a reason to grant leave: *Stayside Corporation Inc. v. Cyndric Group Inc.*, 2024 ONCA 630, at para. 11. But as *Glyco* explains, at para. 7, it is not the only relevant consideration:

A non-lawyer who is closely tied to the corporation granted leave under r. 15.01(2) is akin to a self-represented party, but the separate legal personhood of the corporation means, in effect, that the non-lawyer is providing legal services to another person, contrary to s. 26.1(1) of the Law Society Act, R.S.O. 1990, c. L.8. Moreover, non-lawyers are not bound by the *Rules of Professional Conduct*, nor are they subject to the personal financial consequences associated with cost orders that self-represented litigants face: *Leisure Farm Construction Limited v. Dalew Farms Inc. et.al.*, 2021 ONSC 105 at paras. 12-15. Permitting a non-lawyer to act also risks creating an undue burden on the respondents and the court.

[7] The concerns articulated in *Glyco* of non-lawyers imposing an undue burden are abundantly displayed in this case.

[8] It is not disputed that Mr. Paraskevopoulos has a sophisticated understanding of commercial property leases. But his recent efforts at representing the corporation amply demonstrate that he is unable to do so in a manner that does not impose unacceptable costs on both opposing counsel and the court. He has, on multiple occasions, filed factums with the court that are replete with fabricated legal citations. They reference non-existent cases and miscite genuine cases for propositions that those cases do not even address. They provide notional hyperlinks to authorities that link instead to wholly irrelevant documents. They

reference provisions of statutes that do not exist. Quoted text from case law and statutes are completely fabricated.

[9] A solicitor who acted in such a manner – whether out of duplicity or incompetence – would rightly face severe consequences: professional disciplinary proceedings and punishment ranging from a citation to fine or disbarment, in addition to public opprobrium. But a non-lawyer faces none of these sanctions, notwithstanding the costs that such conduct imposes on opposing parties and the court, who are left to identify and expose the fabrications. A rigorous application of r. 15.01(2) is one of the few tools currently available to courts to apply to non-lawyers to manage this risk.

DISPOSITION

[10] Leave to represent the corporation is therefore denied. Accordingly, the motion of the corporation for an extension of time is adjourned. If the corporation has not filed a Notice of Appointment of Lawyer within 30 days, the registrar is directed to dismiss the corporation's motion for an extension of time, and dismiss the appeal. The responding party is entitled to costs of the motion in the amount of \$5,000 inclusive of HST and disbursements, payable by the corporation.

“B.W. Miller J.A.”