

January 27, 2025

Municipality of East Hants

15 Commerce Court, Elmsdale NS

Attn: Kim Ramsay

Re: Hants North Jays International Tournament 2019

Please be advised that the Hants North Baseball Association and Hants North Recreation and Development Association are hereby requesting that the Municipality of East Hants permit the above named associations to retain the \$9000.00 that was previously awarded them in 2019, as an advance. The advance was secured to establish a commitment with Dennis Woodworth in hosting an international baseball tournament, namely the 2019 Canada-Cuba Good Will Tour.

Initially the Tour was scheduled to take place from June 28 through July 4, 2019 but, due to circumstances beyond our control and as outlined below, the Cuban team was unable to enter Canada and the down payment was not refunded as had been negotiated between the Hants north baseball Association and Dennis Woodworth.

Currently, the Hants North Baseball Association has an urgent need for new equipment and upgrades to the facility, along with the funding to complete these requirements. Financing for a commercial grade mower, roofing repairs or installation of metal roofing are but two of the costly projects faced by the Hants North Baseball Association. The investment of the previous advance of \$9000 would be of great benefit to the community who regularly use the facilities year round. Hence, the request to retain the previously awarded monies and apply them to the above projects.

Below is a thorough review of the series of events that led to the advance awarded to the Hants North Baseball Association in 2019, the unfortunate circumstances that cost the association the use of these funds and any potential revenue that the association, and community, would have benefited from, and the mitigation to recoup the loss that was incurred.

Scope of work, events, and preparation are included below from 2018 to present:

Upon return from the 2018 Canada Cuba Goodwill Tour in Cuba the Hants North Baseball Association met with Dennis Woodworth regarding bringing the Cuban Baseball team to Nova Scotia. This idea was agreed upon by Dennis Woodworth and

Hants North Baseball Association and planning commenced, including the Hants North Recreation and Development Association, as well.

The idea was to host the Cuban team for a 1 week period from end of June to the 1st week of July. The week was to consist of a 12 team baseball tournament at Findlay Park with teams from around the province, as well as PEI. The tournament was set to take place over July 1 st weekend to celebrate Canada Day. There were several other events and activities scheduled in conjunction with this tournament to engage the Cuban team in Canadian culture and heritage. One example that was planned included a school visit where the Cuban team would attend the last day of school at a local elementary. Plans were also in place to visit local attractions in the community such as Burntcoat Head Park, a local dairy farm and attend a Canada Day picnic and concert entailing a Cuban band performance.

To fully immerse the visiting team in our community, the players were to be billeted with community members who had offered to open their homes and had completed appropriate screening and interviews to be considered. Clearly, this event was slated to be an event for the community as a whole and, thus, had significant interest and anticipation generated in the weeks prior.

Approximately one month ahead of the event the Hants North Baseball Association was notified, by Dennis Woodworth, that the Cuban team were unable to obtain their travel visas for entry into Canada and therefore would not be permitted to participate. Upon learning this, the Associations and the community alike were devastated and mystified as to how the events could have played out as they did.

The organizing committee contacted Kody Blois and shared the shattering news and he proceeded to contact Scott Brison to aid in the acquisition of the proper paperwork, thereby allowing the Cuban team to enter Canada. Mr. Brison immediately communicated that his team would help Mr. Woodworth expedite the paperwork, obtain the visa's, and move forward. However, there was no cooperation from Mr. Woodworth to follow through.

After lengthy discussion, and without the Cuban team, the Hants North Baseball Association chose to continue with the baseball tournament, while other scheduled events were either canceled or downsized. Unfortunately, when the Cuban team was no longer participating, two additional teams who had been entered in the tournament opted to back away from the tournament, resulting in a 10 team baseball tournament. (Please see the attached financial documentation.)

Despite the loss of three teams from the scheduled tournament, the organization of the entire event consisted of an remarkable number of volunteer hours, in planning, preparing, and executing the event; time that took place over an 18 month period.

Upon the closing of the tournament the organizing committee met and decided that every effort would be made to ensure that Dennis Woodworth was held responsible for the losses incurred by the Associations and the community. It was brought to the attention of the organizers that Mr. Woodworth had been involved in similar situations previous to this circumstance whereby the Hants North Baseball Association and Hants North Recreation and Development Association suffered a loss of \$10,000.00 directly secured by Mr. Woodworth in the efforts to organize the international exchange.

Mr. Woodworth had earned a reputation for refusing to reimburse groups for down payments and the Associations were learning of this the hard way. Where Mr. Woodworth was refusing to return acquired funds back to the Associations, it was deemed imperative to pursue legal action against him, as the only course of action to attempt to recoup the funds lost.

To highlight the litigation process a chronology is provided below:

- Midsummer - Eric White and Angela Parks, representing the Hants North Baseball Association and the and Hants North Recreation and Development Association respectively, met with Kody Blois, MP, and Michael Blades of MacInnes Cooper. Mr. Blades was employed to commence action against Dennis Woodworth and True Power Atlantic Marketing. Mr. Blades identified a cost of \$2000.00 to obtain an uncontested Judgement.
- September 11, 2019 legal action was registered in Small Claims Court with a hearing dated for November 12, 2019.
- September 16, 2019, Dennis Woodworth was served with the court documents.
- October 8, 2019 Mr. Blades filed an application for Quick Judgement, whereas a defence had not been received to date.
- Nov 5, 2019 Dennis Woodworth contacted SCC and advised he was out of the country and would, therefore be unable to attend a hearing; he requested an adjournment and the court advised him that no defense had been filed in the matter.
- Nov 15, 2019 Dennis Woodworth filed a defense.
- January 2020 – While the Quick Judgement that had previously been filed was granted in October, neither party was made aware until January 2020.
- Jan 29, 2020 Dennis Woodworth filed a motion to have the Quick Judgement set aside.
- February 27, 2020, the motion to set aside the Quick Judgement was heard and Judge Davis denied Mr. Woodworth's request.

-In early March 2020, Mr. Woodworth filed a Notice of Appeal with the Supreme Court of Nova Scotia.

-December 7, 2020 Mr. Blades left the McInnis Cooper Law Firm and was no longer able to represent the Associations; the new lawyer appointed to the case advised the Associations that their billing was currently over \$2500.00 and would further cost an additional \$2500-4000 dependent on further action.

Eric White contacted Patrick O'Neill, with Burchell MacDougall, who agreed the firm would take over the case.

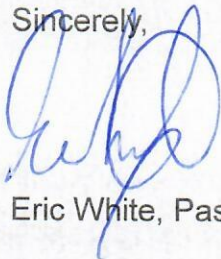
-In February 2021, the Notice of Appeal was heard in NS Provincial Court and denied. The Judgement for \$17,107.88 was officially awarded.

-In March 2021 the Judgement was registered with NS Registry of Deeds and a lien was placed on Dennis Woodworth's property.

-After a couple of unsuccessful attempts to secure the awarded funds by means of execution orders through the sheriff's office, Mr Woodworth refinanced his property and Burchell Macdougall are currently custody of the funds the Associations were due.

In closing, the Associations have experienced an arduous and agonizing process but one worth the battle now that the previous losses have been recouped. Although, despite the persistence and resilience of the Community and the Associations in this series of events, it remains unfortunate that the team from Cuba were powerless in making their one in a lifetime experience come to fruition, and that the players, organizers, and community here missed the experience while also being exploited.

Sincerely,



Eric White, Past President