

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

2nd AFFIDAVIT OF MEGAN LOPES

I, Megan Lopes, of the City of Kitchener, in the Province of Ontario, AFFIRM AND SAY:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I have previously affirmed another affidavit in connection with this matter. My affidavit dated June 18, 2025 was included in the Respondents' Responding Record Vol. 1.
3. In and around September 2025 I was offered a motel room at the Super 8 Motel, located at 650 Hespeler Road, Cambridge, ON N1R 6J8, by the Region of Waterloo.

4. I accepted the offer and I was allowed to bring 3 to 4 bags of belongings, a suitcase and my blanket with me. I was provided a cab and I went to the Super 8 Motel by myself from the encampment. I left my tent and mattress at the encampment, as I was not offered storage for these belongings.
5. I stayed at the Super 8 Motel for approximately 3 weeks.
6. I suffer from Mixed Personality Disorder, Attention Deficit Hyperactivity Disorder, Bipolar Disorder, and several other mental health disabilities. Due to my mental health, I struggle with aggression. I also use substances including marijuana and meth.
7. I receive Ontario Works and I have spoken to the housing worker about applying for Ontario Disability Support Program (ODSP) benefits. They were going to help me find a doctor to complete my ODSP application.
8. Earlier this week I had a disagreement with the motel manager and I was kicked out of the Super 8 Motel. The manager called the police and I was arrested. I was released but given a trespass notice and told I could not return to the Super 8 Motel.
9. The first time I had a negative interaction with the manager was because my key card kept deactivating and I kept going to the front desk to have it reactivated. She did not like that this kept happening and she cussed me out.

10. The second time I had an incident with the manager was when she called the police on me. I had just woken up and I was in the lobby in my sports bra. She told me to put on a shirt and I told her I didn't have any clean clothes. Things escalated and we yelled at each other and then she called the police.
11. The manager also alleged that I caused property damage at the motel.
12. In and around Monday, October 6, 2025 I returned to the 100 Victoria St. Encampment as I had nowhere else to go.
13. When I returned to the encampment I discovered that my tent and mattress had been torn and were covered with garbage and rat feces. I was told by the Region's housing worker that my belongings are safe at the Super 8 Motel but I don't know how I will get my belongings back.
14. I feel that my personal circumstances have deteriorated compared to when I left the encampment. Most of my belongings are still at the motel and my belongings at the encampment are damaged. Close friends I relied on for support at the encampment are still at the motel.
15. Region of Waterloo staff have never offered me a permanent housing option. They have only offered me a motel room, they said I could stay there for up to one year.

16. The Region's housing worker is trying to help get me a different motel room. I want to get away from the people at the Super 8 Motel in Cambridge, I don't think it is good for me to be around those people. But I have heard that at the Weber Inn in Kitchener the women that stay there are asked to provide sexual favours to the owner and that is concerning to me.

17. If the Encampment were no longer available, I would have nowhere to go.

AFFIRMED BEFORE ME in the)
City of Kitchener, this 10th day of)
October, 2025)
In the Regional Municipality of Waterloo)





Megan Lopes

ASHLEY SCHUITEMA,
a Commissioner, etc.,
Province of Ontario,
while a Barrister and Solicitor.
LSO #68257G