

## Publisher's Note

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### **DIVORCE ACT MANUAL**

**T. Catherine Christopher**  
**Release No. 4, December 2024**

### **Publisher's Special Release Note 2023**

The pages in this work were reissued in September 2023 and updated to reflect that date in the release line. Please note that we did not review the content on every page of this work in the September 2023 release. We will continue to review and update the content according to the work's publication schedule. This will ensure that subscribers are reading commentary that incorporates developments in the law as soon as possible after they have happened or as the author deems them significant.

### **What's New in this Update:**

This release contains updates to the Interpretation section of the book, Appendix WP (Divorce Act Words and Phrases) and Appendix SLL (Selected Legal Literature).

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## Highlights

- In this release, the Ontario Court of Appeal, in *J.F.R. v. K.L.L.* (2024), 1 R.F.L. (9th) 255 (Ont. C.A.), held that the adult child of the marriage was entitled to be heard in a parenting application that materially impacted him. Here, the adult child was disabled and the initial hearing his views were presented through a social worker and in a report. However, on appeal, this was considered an inadequate recognition of the natural justice principle of audi alteram partem and the adult child's fundamental right to be heard. The principle of *audi alteram partem* outlined in *J.F.R. v. K.L.L.* has been applied in other proceedings involving adult children regardless of their circumstances.