

# Publisher's Note

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<b>CHILD SUPPORT GUIDELINES SERVICE</b> Terry W. Hainsworth Release No. 2, June 2026
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## What's New in this Update:

This release includes new cases and commentary in Chapter 2 "Amount of Child Support", Chapter 5 "Income", Chapter 6 "Variation" and Chapter 9 "Orders".

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## Highlights:

- In *MW v. GT*, 2026 MBQB 26 (Man. Q.B.), the court imputed a minimum wage to the respondent even though he did not have a history of working for wages. He was a small cattle farmer who also rented out part of his lands. He had not filed his previous years tax returns. This left the court with no other alternative than to ascribe a minimum wage to him. See § 5:74 Quantum.
- The concept of “effective notice” applies to original applications for child support. If a child is not a child of the marriage at the date of the original application, child support (including retroactive support) cannot be sought: *Michel v. Graydon* (2020), 45 R.F.L. (8th) 1 (S.C.C.), at paras 86-90; *Q.L. v. D.L.*, 2025 BCSC 2539 (B.C. S.C.). See § 5:16 The Concept of Effective Quantum.