

Another Step Forward: Recognition of Non-Monetary Orders in Ontario

The courts of Ontario have taken another step forward in the recognition and enforcement of foreign non-monetary orders. *In Re Grace Canada Inc.* (available [here](#)) the Superior Court of Justice recognized a Manitoba order which had allowed a law firm to act in a particular matter by finding it was not in a conflict of interest. Grace Canada Inc. had opposed recognition on the basis that the Manitoba order was non-monetary. The Superior Court of Justice relied on two earlier recent Court of Appeal for Ontario decisions supporting the recognition of non-monetary orders: *Re Cavell Insurance Co.* (available [here](#)) and *Pro-Swing v. ELTA Golf Inc.* (available [here](#)). An appeal of the latter decision was heard by the Supreme Court of Canada in December 2005 and a decision is eagerly awaited.