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**ONTARIO FAMILY LAW ACT MANUAL**

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

- In *Martin v. Martin*, 2018 CarswellOnt 19157 (Ont. S.C.J.), the husband had provided gratuitous services to his father's company for many years. The court concluded that the transfer of shares from the father to the son was not a "gift" but, rather, was earned through the husband's past services. See Topic 4§11.02(b) Acquisition by Gift or Inheritance.
- There is no "absolute cut off date" when support ends. Children have the right to pursue a second degree or diploma depending on the circumstances of the case: *Hilhorst v. Amaral*, 2018 CarswellOnt 9846 (Ont. S.C.J.). In *Thompson v. Shelly*, 2018 CarswellOnt 16326 (Ont. S.C.J.), the court listed several of the considerations in determining

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whether support should continue beyond a first degree or diploma.  
See Topic 31§3.01 Full Time Program of Education Definitions.

- The mere passage of time will not normally be a material change of circumstance: *Hess v. Hamilton* (2018), 5 R.F.L. (8th) 287 (Ont. S.C.J.). See Topic 37§2.04 Material Change.