

COURT FILE NUMBER QBG-SA-00766-2022

COURT OF KING'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE SASKATOON

PLAINTIFFS: CAITLIN ERICKSON and COY NOLIN

DEFENDANTS KEITH JOHNSON, JOHN OLUBOBOKUN, KEN SCHULTZ,
NATHAN RYSAVY, DUFF FRIESEN, LYNETTE WEILER,
JOEL HALL; FRAN THEVENOT, LOU BRUNELLE, JAMES
RANDALL, TRACEY JOHNSON, SIMBO OLUBOBOKUN,
ELAINE SCHULTZ, CATHERINE RANDALL, KEVIN
MACMILLAN, ANNE MACMILLAN, DAWN BEAUDRY,
NATHAN SCHULTZ, AARON BENNEWEIS, DEIDRE
BENNEWEIS, SPEPHANIE CASE, DARCY SCHUSTER,
RANDY DONAUTER, JOHN THURINGER, MILE TWO
CHURCH INC., THE GOVERNMENT OF SASKATCHEWAN,
JOHN DOES and JANE DOES

**REQUEST FOR PARTICULARS
BY TRACEY JOHNSON**

TAKE NOTICE THAT pursuant to Rule 3-71, the Defendant, TRACEY JOHNSON, requests the Plaintiffs provide further and better particulars of the Amended Statement of Claim ("Amended Claim") dated December 12, 2022, said particulars to be delivered within eight (8) days after service of this document:

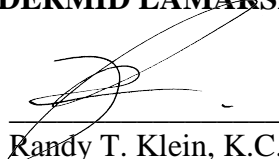
1. With respect to paragraph 31(a) of the Amended Claim, particulars of any incidence of alleged negligence as it relates to the Defendant, Tracey Johnson, including particulars of any alleged breach of any duty of care, and particulars as to any alleged harm caused by the Defendant, Tracey Johnson, and whether the Plaintiffs claim in negligence against the Defendant, Tracey Johnson, for any damages allegedly attributable to any other Defendant, and if so, to what degree.
2. With respect to paragraph 31(a) of the Amended Claim, particulars of any incidence of alleged gross negligence as it relates to the Defendant, Tracey Johnson, including particulars of any alleged breach of any duty of care, alleged intent to do harm, or wanton or reckless conduct, and particulars as to any alleged harm caused by the Defendant, Tracey Johnson, and whether the Plaintiffs claim in gross negligence against the Defendant, Tracey Johnson, for any damages allegedly attributable to any other Defendant, and if so, to what degree.

3. With respect to paragraph 31(a) of the Amended Claim, particulars of any incidence of alleged assault and/or battery as it relates to the Defendant, Tracey Johnson.
4. With respect to paragraph 31(a) of the Amended Claim, particulars of any incidence of alleged infliction of mental suffering as it relates to the Defendant, Tracey Johnson.
5. With respect to paragraph 31(a) of the Amended Claim, particulars of any alleged conspiracy involving the Defendant, Tracey Johnson, including particulars of whom she allegedly conspired with, the particulars and facts relied upon in alleging that the Defendant, Tracey Johnson intended to cause injury to the Plaintiffs, and as to whether it is pleaded that any alleged conduct by the alleged conspirators was lawful or unlawful.
6. With respect to paragraph 31(d) of the Amended Claim, particulars of any alleged incidence of conduct by the Defendant, Tracey Johnson, which the Plaintiffs claim entitle them to aggravated or punitive damages against the Defendant, Tracey Johnson.
7. With respect to paragraph 31(e) of the Amended Claim, whether it is alleged that the Defendant, Tracey Johnson administered the corporal punishment of any minor, and if so particulars of the alleged incidence of the same.
8. With respect to paragraph 32 of the Amended Claim, whether the use of the word "Defendants" relates to the Defendant, Tracey Johnson, or whether the use of the word is a misnomer, and if it is alleged that the word "Defendants" does relate to the Defendant, Tracey Johnson, particulars of any alleged incidence described in paragraphs 32(b) and/or 32(c) that allegedly relates to or involves the Defendant, Tracey Johnson.
9. With respect to the Amended Claim in general, where the Plaintiffs allege sexual and/or physical assault, particulars of the identities of the alleged perpetrators of those alleged abuses so as to allow the Defendant, Tracey Johnson, to assess the allegations, and any association she may have or not had with any alleged perpetrator.
10. With respect to the Amended Claim in general, particulars of any alleged incidence of corporal punishment, physical assault, trespass to the person, battery, and/or intentional infliction of mental injury allegedly perpetrated by the Defendant, Tracey Johnson.

11. With respect to the Amended Claim in general, particulars of any alleged incidence of corporal punishment, physical assault, trespass to the person, battery, and/or intentional infliction of mental injury allegedly observed by the Defendant, Tracey Johnson.
12. With respect to the Amended Claim in general, particulars of any incidence of alleged corporal punishment, physical assault, trespass to the person, battery, and/or intentional infliction of mental injury allegedly condoned or conspired to by the Defendant, Tracey Johnson.
13. With respect to the Amended Claim in general, particulars of any alleged threats by the Defendant, Tracey Johnson, of corporal punishment, physical assault, trespass to the person, battery, or to intentionally inflict mental injury, and any particulars of any alleged coercion or intimidation.
14. With respect to the Amended Claim in general, particulars of any alleged incidents and alleged acts complained of and allegedly carried out by others that the Defendant, Tracey Johnson, either allegedly had knowledge of, directed or approved.

DATED at the City of Saskatoon, in the Province of Saskatchewan, this 28th day of March, 2023.

MacDERMID LAMARSH

Per: 
Randy T. Klein, K.C.
Solicitor for the Defendant
Tracey Johnson

CONTACT INFORMATION AND ADDRESS FOR SERVICE:

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