

COURT FILE NUMBER QBG-SA-00766-2022

COURT OF KING'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE SASKATOON

PLAINTIFFS CAITLYN ERICKSON, JENNIFER SOUCY (BEAUDRY) and STEFANIE HUTCHINSON 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, STEPHANIE CASE, DARCY SCHUSTER, RANDY DONAUER, JOHN THURINGER, MILE TWO CHURCH INC., THE GOVERNMENT OF SASKATCHEWAN, JOHN DOES and JANE DOES

**REQUEST FOR PARTICULARS
BY LOU BRUNELLE**

TAKE NOTICE THAT pursuant to Rule 3-71, the Defendant, Lou Brunelle ("**Lou**"), requests that the Plaintiffs provide further and better particulars of the Amended Statement of Claim (the "**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 45 and 46 of the Amended Claim, particulars of the alleged incidents of corporal punishment allegedly observed by Lou, including the:
 - (a) Frequency;
 - (b) Location;
 - (c) Dates on which such alleged conduct was observed; and
 - (d) The names of the alleged victims.

2. With respect to paragraph 47 and 48 of the Amended Claim, particulars of Lou's alleged abuse in regard to trespass to the person, intentional infliction of mental injury, physical or sexual assault and/or battery of students, minor adherents and congregants of the Church, including the:
 - (a) Frequency;
 - (b) Location;
 - (c) Dates on which such alleged conduct was observed; and
 - (d) The names of the alleged victims.

3. With respect to paragraph 49 of the Amended Claim, particulars of Lou's alleged use of the threat of Physical Abuse and Non-Physical Abuse to intentionally inflict mental injury on, and intimidate and coerce students, minor adherents and congregants of the Church, including the:
 - (a) Frequency;
 - (b) Location;
 - (c) Dates on which such alleged conduct was observed; and
 - (d) The names of the alleged victims.

4. With respect to paragraph 49 of the Amended Claim, particulars of Lou's alleged direction of employees, agents and representatives of Mile Two Church Inc. to carry out Physical Abuse, Non-Physical Abuse and Intimidation Abuse, including the:
 - (a) Frequency;
 - (b) Location;
 - (c) Dates on which such alleged conduct was observed; and
 - (d) The names of the alleged victims.

5. With respect to paragraph 63 of the Amended Claim, particulars of instances in which Lou failed to supervise the employees, agents and representatives to ensure the safety of the students of the School and minor adherents and congregants of the Church, including the:
 - (a) Frequency;
 - (b) Location;
 - (c) Dates on which such alleged conduct was observed; and
 - (d) The names of the alleged victims.

DATED at Saskatoon, Saskatchewan, this 18th day of October, 2023.

CUELENAERE LLP

Per: 

Solicitors for the Defendant,
Lou Brunelle

CONTACT INFORMATION AND ADDRESS FOR SERVICE

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