

COURT FILE NUMBER QBG-SA-00766-2022

COURT OF KING'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE SASKATOON

PLAINTIFF 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 AARON BENNEWEIS

TAKE NOTICE THAT pursuant to Rules 3-71, 13-8, 13-9, and 13-12 of *The King's Bench Rules*, the Defendant, Aaron Benneweis, requests the Plaintiffs provide further and better particulars of the Second Amended Statement of Claim (the "**Statement of Claim**") dated June 29, 2023, other than allegations of a sexual nature made by Jennifer Soucy (Beaudry), as follows:

1. With respect to paragraphs 41, 43, and 45-46 of the Statement of Claim, full particulars of the alleged corporal punishment that relate to Aaron Benneweis, including without limitation:
  - (a) The relevant cause of action alleged against Aaron Benneweis with respect to the allegations;
  - (b) The identity of all individuals who were abused or corporally punished;
  - (c) The relevant dates and timeframe of all alleged abused or corporal punishments carried out by Aaron Benneweis;
  - (d) The location where Aaron Benneweis carried out the alleged abused or corporal punishments; and
  - (e) The particulars of the actions or conduct related to the alleged abused or corporal punishments that constitute a cause of action known to law.

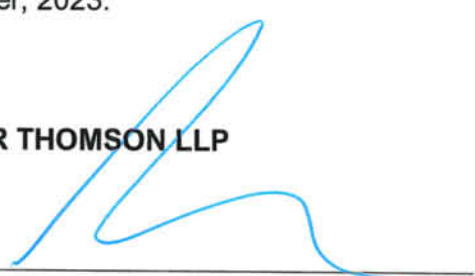
2. Full particulars of the allegations of Physical Abuse, Non-Physical Abuse, Intimidation Abuse, and Harms (as defined in the Statement of Claim) as they relate to Aaron Benneweis, including without limitation:
  - (a) The relevant cause of action alleged against Aaron Benneweis with respect to the allegations;
  - (b) The identity of all individuals alleged to have suffered from the alleged Physical Abuse, Non-Physical Abuse, Intimidation Abuse, and Harms by Aaron Benneweis;
  - (c) The relevant dates or timeframe of all alleged Physical Abuse, Non-Physical Abuse, Intimidation Abuse, and Harms;
  - (d) The location where the alleged Physical Abuse, Non-Physical Abuse, Intimidation Abuse, and Harms were committed by Aaron Benneweis; and
  - (e) The particulars of the actions or conduct related to the alleged Physical Abuse, Non-Physical Abuse, Intimidation Abuse, and Harms by Aaron Benneweis.
3. With respect to paragraph 31 and paragraphs 60 to 62 of the Statement of Claim, full particulars of the alleged conspiracy to harm by lawful and unlawful means that relate to Aaron Benneweis, including without limitation, the identity of all parties to the conspiracy.
4. With respect to paragraph 70 of the Statement of Claim, full particulars of the allegations that relate to Aaron Benneweis, including without limitation:
  - (a) The identity of all individuals alleged to have suffered from the alleged negligence by Aaron Benneweis;
  - (b) The relevant dates or timeframe of all alleged negligence;
  - (c) The location where the alleged negligence was committed by Aaron Benneweis; and
  - (d) The particulars of the actions or conduct related to the alleged negligence by Aaron Benneweis.
5. With respect to paragraphs 73 to 74 of the Statement of Claim, full particulars of the allegations that relate to Aaron Benneweis, including without limitation:

- (a) The identity of all individuals alleged to have been owed a fiduciary duty by Aaron Benneweis;
- (b) The relevant dates or timeframe of all alleged breaches of fiduciary duty;
- (c) The locations where the fiduciary duty was breached by Aaron Benneweis; and
- (d) The particulars of the actions or conduct related to the breaches of fiduciary duty Aaron Benneweis.

DATED at Saskatoon, Saskatchewan, this 10<sup>th</sup> day of October, 2023.

**MILLER THOMSON LLP**

Per:



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Scott Spencer,  
Solicitors for the Defendant

**CONTACT INFORMATION AND ADDRESS FOR SERVICE**

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