

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 DEIDRE BENNEWEIS

TAKE NOTICE THAT pursuant to Rules 3-71, 13-8, 13-9, and 13-12 of *The King's Bench Rules*, the Defendant, Deidre Benneweis, requests the Plaintiffs provide further and better particulars of the Second Amended Statement of Claim (the "**Statement of Claim**") dated June 29, 2023, as follows:

1. With respect to paragraphs 41, 43, and 45-46 of the Statement of Claim, full particulars that relate to Deidre Benneweis, including without limitation:
 - (a) The relevant cause of action alleged against Deidre 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 abuse or corporal punishments carried out by Deidre Benneweis;
 - (d) The location where Deidre Benneweis carried out the alleged abuse or corporal punishments; and
 - (e) The particulars of the actions or conduct related to the alleged abuse 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 Deidre Benneweis, including without limitation:
 - (a) The relevant cause of action alleged against Deidre 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 Deidre 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 Deidre Benneweis; and
 - (e) The particulars of the actions or conduct related to the alleged Physical Abuse, Non-Physical Abuse, Intimidation Abuse, and Harms by Deidre 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 Deidre 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 Deidre Benneweis, including without limitation:
 - (a) The identity of all individuals alleged to have suffered from the alleged negligence by Deidre Benneweis;
 - (b) The relevant dates or timeframe of all alleged negligence;
 - (c) The location where the alleged negligence was committed by Deidre Benneweis; and
 - (d) The particulars of the actions or conduct related to the alleged negligence by Deidre Benneweis.
5. With respect to paragraphs 73 to 74 of the Statement of Claim, full particulars of the allegations that relate to Deidre Benneweis, including without limitation:

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

DATED at Saskatoon, Saskatchewan, this 24th day of October, 2023.

MILLER THOMSON LLP

Per:



Scott Spencer,
Solicitors for the Defendants

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