

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 FRAN THEVENOT

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

1. With respect to paragraph 45 and paragraph 46 of the Claim, full particulars of the incidents of corporal punishment specifically observed by Fran Thevenot, including when and where it occurred, who administered the corporal punishment and who received the corporal punishment.
2. With respect to paragraph 46.2 of the Claim, particulars of the physical, psychological, emotional and religious abuse allegedly committed by Fran Thevenot, including when and where it occurred and the names of the alleged victim(s).
3. With respect to paragraph 47 of the Claim generally, particulars of specific conduct alleged against the Individual Defendants that were committed by Fran Thevenot

specifically, and which are not otherwise addressed by the Requests for Particulars in paragraphs 4-6 below.

4. With respect to paragraph 47(a)(i)(1) of the Claim, please provide particulars of the alleged “beratement” by Fran Thevenot, including:

- (a) Dates or approximate dates on which such alleged conduct was observed;
- (b) The names of the alleged victims;
- (c) The words of beratement allegedly spoken by Fran Thevenot.

5. With respect to paragraph 47(a)(i)(1) of the Claim, provide particulars of any paddling administered directly by Fran Thevenot during the incident described. Please provide particulars of any words spoken by Fran Thevenot during that paddling.

6. With respect to paragraph 47(a)(i)(3) of the Claim,

- (a) Particulars of who administered the paddles that struck Caitlin Erickson on the leg and when it occurred, relative to the time of the volleyball practice, and when and where it occurred;
- (b) Particulars of who was present for the paddling that struck Caitlin Erickson on the leg;
- (c) Particulars of when and how Caitlin Erickson advised Fran Thevenot that she had been injured by a paddling prior to the volleyball practice;
- (d) Particulars of the individual, and isolating, additional strenuous exercise which Fran Thevenot allegedly required Caitlin Erickson to do as a result of her limping;
- (e) Dates or approximate dates on which all such alleged conduct occurred.

7. With respect to paragraph 48 and 49 of the Claim, particulars of any specific conduct that are listed as pertaining to Caitlin Erickson, which Fran Thevenot is alleged to have engaged in.

8. With respect to paragraph 49(a)(i) of the Claim; particulars of whether Fran Thevenot is alleged to be one of the Individual Defendants who discouraged Jennifer Soucy (Beaudry) from reporting abuse by Aaron Benneweis to police and if so, particulars of when she allegedly did this and particulars of any such discouragement.

9. With respect to paragraphs 60-62 of the Claim, particulars of Fran Thevenot's alleged involvement involved in the conspiracy, including:

- (a) Dates or approximate dates on which such alleged conduct was observed;
- (b) Who else Fran Thevenot allegedly conspired with; and
- (c) What acts were committed in furtherance of the alleged conspiracy, by Fran Thevenot and when?

DATED at Saskatoon, Saskatchewan, this 30th day of October, 2023.

McKERCHER LLP

Per: Kaylea Dunn
Solicitors for the Defendant,
FRAN THEVENOT

CONTACT INFORMATION AND ADDRESS FOR SERVICE

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