

COURT FILE NUMBER                      QBG-SA-00766-2022

COURT OF KING'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE                         SASKATOON

PLAINTIFFS  
(RESPONDENTS)                         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 KEN SCHULTZ**

TAKE NOTICE THAT pursuant to Rules 3-71, 13-8, 13-9, and 13-12 of *The King's Bench Rules*, the Defendant, Catherine Randall, 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 paragraph 31(a) of the Statement of Claim, full particulars of the allegations that relate to Ken Schultz, including without limitation:
  - (a) The identity of all individuals alleged to have been owed a fiduciary duty by Ken Schultz;
  - (b) The relevant dates or timeframe of all alleged breaches of fiduciary duty;
  - (c) The locations where the fiduciary duty was breached by Ken Schultz; and
  - (d) The particulars of the actions or conduct related to the breaches of fiduciary duty of Ken Schultz.

2. With respect to paragraph 31(a) of the Statement of Claim, full particulars of the allegations that relate to Ken Schultz, including without limitation.
  - (a) The identity of all individuals alleged to have suffered from the alleged negligence and/or gross negligence by Ken Schultz;
  - (b) The relevant dates or timeframe of all alleged negligence and/or gross negligence;
  - (c) The location where the alleged negligence and/or gross negligence was committed by Ken Schultz; and
  - (d) The particulars of the actions or conduct related to the alleged negligence and/or gross negligence by Ken Schultz.
  
3. With respect to paragraph 31(a) of the Statement of Claim, full particulars of the allegations that relate to Ken Schultz, including without limitation:
  - (a) The identity of all individuals alleged to have suffered from the assault and/or battery by Ken Schultz;
  - (b) The relevant dates or timeframe of any alleged assaults and/or battery;
  - (c) The location where the alleged assaults and/or battery was committed by Ken Schultz; and
  - (d) The particulars of the actions or conduct to the alleged assault and/or battery by Ken Schultz.
  
4. With respect to paragraph 31(a) of the Statement of Claim, full particulars of the allegations that relate to Ken Schultz, including without limitation:
  - (a) The identity of all individuals alleging mental suffering as a result of the actions or conduct of Ken Schultz;
  - (b) The relevant dates or timeframe of any alleged infliction of mental suffering by Ken Schultz;
  - (c) The location where the alleged infliction of mental suffering took place; and

- (d) The particulars of the actions or conduct to the infliction of mental suffering by Ken Schultz.
5. With respect to paragraph 31(a) of the Statement of Claim, full particulars of the allegations that relate to Ken Schultz, including without limitation:
- (a) The identity of all individuals alleging to have suffered damages or a loss as a result of the claim of alleged conspiracy against Ken Schultz;
  - (b) The relevant dates or timeframe of any alleged conspiracy by Ken Schultz; and
  - (c) The particulars of the actions or conduct of Ken Schultz allegedly giving rise to a claim against Ken Schultz in conspiracy.
6. With respect to paragraph 31(d) of the Statement of Claim, full particulars of the allegations that relate to Ken Schultz, including without limitation:
- (a) The identity of all individuals alleging to be entitled to punitive, exemplary and/or aggravated damages from Ken Schultz;
  - (b) The relevant dates or timeframe of any conduct allegedly giving rise to a claim of punitive, exemplary and/or aggravated damages against Ken Schultz; and
  - (c) The particulars of the alleged conduct of Ken Schultz allegedly giving rise to a claim of punitive, exemplary and/or aggravated damages against Ken Schultz.
7. With respect to paragraph 31(e) of the Statement of Claim, full particulars of the allegations that relate to Ken Schultz, including without limitation:
- (a) The identity of all individuals alleging to have been allegedly corporally punished by Ken Schultz;
  - (b) The relevant dates or timeframe of any alleged corporal punishment by Ken Schultz;
  - (c) The location that any alleged corporal punishment took place; and
  - (d) The particulars of the alleged conduct of Ken Schultz giving rise to a claim against Ken Schultz relating to corporal punishment.

8. With respect to paragraphs 32(b) and 32(c) of the Statement of Claim, full particulars of the allegations that relate to Ken Schultz, including without limitation:
  - (a) The identity of all individuals alleging to have a claim pursuant to paragraphs 32(b) and 32(c);
  - (b) The dates or timeframes of any alleged conduct giving rise to a claim against Ken Schultz in relation to the matters pleaded in paragraphs 32(b) and/or 32(c);
  - (c) The location that any alleged conduct took place; and
  - (d) The particulars of alleged conduct of Ken Schultz giving rise to a claim against Ken Schultz relating to the claims set out in paragraphs 32(b) and/or 32(c).
  
9. With respect to paragraphs 46 of the Statement of Claim, full particulars of the allegations that relate to Ken Schultz, including without limitation:
  - (a) The identity of all individuals alleging to have been allegedly physically, psychologically, emotionally and religiously abused by Ken Schultz;
  - (b) The relevant dates or timeframe of any alleged physical, psychological, emotional and religious abuse by Ken Schultz;
  - (c) The location that any alleged physical, psychological, emotional and religious abuse took place; and
  - (d) The particulars of the alleged conduct of Ken Schultz giving rise to a claim against Ken Schultz relating to physical, psychological, emotional and religious abuse.
  
10. With respect to paragraphs 47 of the Statement of Claim, full particulars of the allegations that relate to Ken Schultz, including without limitation:
  - (a) The identity of all individuals alleging physical or sexual assault and/or battery as a result of the actions or conduct of Ken Schultz;
  - (b) The relevant dates or timeframe of any alleged physical or sexual assault and/or battery by Ken Schultz;

- (c) The location where the alleged physical or sexual assault and/or battery took place; and
  - (d) The particulars of the actions or conduct to the physical or sexual assault and/or battery by Ken Schultz.
11. With respect to paragraphs 48 of the Statement of Claim, full particulars of the allegations that relate to Ken Schultz, including without limitation:
- (a) The identity of all individuals alleging infliction of mental injury including psychological, mental, emotional and spiritual harm as a result of the actions or conduct of Ken Schultz;
  - (b) The relevant dates or timeframe of any alleged infliction of mental injury including psychological, mental, emotional and spiritual harm by Ken Schultz;
  - (c) The location where the alleged infliction of mental injury including psychological, mental, emotional and spiritual harm took place; and
  - (d) The particulars of the actions or conduct to the mental injury including psychological, mental, emotional and spiritual harm by Ken Schultz.
12. With respect to paragraph 49 of the Statement of Claim, full particulars of the allegations that relate to Ken Schultz, including but not limited to:
- (a) The identity of all individuals alleging the threat of physical abuse and non-physical abuse to emotionally inflict mental injury on and/or intimidate students as a result of the actions or conduct of Ken Schultz;
  - (b) The relevant dates or timeframe of any alleged threat of physical abuse and non-physical abuse to emotionally inflict mental injury on and/or intimidate students by Ken Schultz;
  - (c) The location where the alleged threatened physical abuse and non-physical abuse to emotionally inflict mental injury on and/or intimidate students took place; and
  - (d) The particulars of the actions or conduct to the threat of physical abuse and non-physical abuse to emotionally inflict mental injury on and/or intimidate students by Ken Schultz.

13. With respect to the Statement of Claim in general particulars of any alleged incidence of corporal punishment, physical and/or sexual assault, trespass to the person, battery, and/or intentional infliction of mental injury allegedly observed by Ken Schultz not provided in reply to the requests as set out in paragraphs 1-12 above.
14. With respect to the Statement of Claim in general, particulars of any alleged incidence of corporal punishment, physical and/or sexual assault, trespass to the person, battery, and/or infliction of mental injury allegedly condoned or conspired to by Ken Schultz not provided in reply to the requests set out in paragraphs 1-12 above.
15. With respect to the Statement of Claim in general, particulars of any alleged threats by Ken Schultz of corporal punishment, physical and/or sexual assault, trespass to the person, battery, and/or infliction of mental injury, and any particulars of any alleged coercion or intimidation not provided in the reply to the requests set out in paragraphs 1-12 above.
16. With respect to the Statement of Claim in general, particulars of any alleged incidents and alleged acts complained of and carried out by others that Ken Schultz, either allegedly had knowledge of, directed or approved not provided in reply to the requests set out in paragraphs 1-12 above.

DATED at Saskatoon, Saskatchewan, this 30<sup>th</sup> day of October, 2023.

**VANSTONE LAW**



Per: \_\_\_\_\_

Mark R. Vanstone,  
Solicitors for the Defendants,  
Ken Schultz, James Randall,  
Catherine Randall and Duff  
Friesen

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