

COURT FILE NUMBER QBG-SA-00766-2022

COURT OF KING'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE SASKATOON

PLAINTIFFS CAITLIN ERICKSON, JENNIFER SOUCY (BEAUDRY)
and STEFANIE HUTCHINSON

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,
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

Brought under *The Class Actions Act*, SS 2001 c C-12.01

REQUEST FOR PARTICULARS

TAKE NOTICE that you are required by December 31, 2023, to deliver to the Defendant, RANDY DONAUER, (hereinafter referred to as "**Donauer**") a statement of the particulars required herein as follows:

1. With respect to paragraph 28 of the Second Amended Statement of Claim, particulars as to:
 - (a) the policies and procedures the Plaintiffs allege Donauer was instrumental in developing and implementing; and
 - (b) the role the Plaintiffs allege Donauer played in the development and implementation of the policies and procedures.

2. With respect to paragraph 39 of the Second Amended Statement of Claim, particulars as to:

- (a) the objectives and teachings of the Church and School that the Plaintiffs say rely heavily on Donauer's viewpoints and teachings; and
 - (b) the specific viewpoints and teachings of Donauer that the Plaintiffs allege were heavily relied upon.
3. With respect to paragraph 43 of the Second Amended Statement of Claim, particulars as to:
- (a) the abusive policies that the Plaintiffs allege Donauer carried out;
 - (b) the abusive policies that the Plaintiffs allege Donauer developed;
 - (c) the manner in which the Plaintiffs allege Donauer developed these abusive policies; and
 - (d) the manner in which the Plaintiffs allege that Donauer caused other employees, agents, and representatives of Mile Two Church Inc. including all of the Individually Named Defendants, to carry out said abusive policies.
4. With respect to paragraphs 45 and 46 of the Second Amended Statement of Claim, particulars of the corporal punishment allegedly observed by Donauer, including the:
- (a) specific conduct that was allegedly observed by Donauer;
 - (b) dates or approximate dates on which such alleged conduct was observed;
 - (c) location of the conduct that was allegedly observed by Donauer; and
 - (d) the names of the alleged victims.
5. With respect to paragraphs 46.2 of the Second Amended Statement of Claim, particulars of the physical, psychological, emotional and religious abuse allegedly suffered and the hands of Donauer, including the:
- (a) specific conduct that was allegedly suffered at the hands of Donauer;
 - (b) dates or approximate dates on which such alleged conduct occurred;
 - (c) location of the alleged conduct; and
 - (d) the names of the alleged victims.

6. With respect to paragraph 47 of the Second Amended Statement of Claim, particulars of Donauer's alleged abuse in the nature of trespass to the person, physical assault and/or battery of students at the School and minor adherents and congregants of the Church, including the:
 - (a) specific conduct that was allegedly carried out by Donauer;
 - (b) dates or approximate dates on which such alleged conduct occurred;
 - (c) location of the alleged conduct; and
 - (d) the names of the alleged victims.


7. With respect to paragraph 48 of the Second Amended Statement of Claim, particulars of the intentional infliction of mental injury and conduct in the nature of trespass to the person, including psychological, mental, emotional and spiritual harm to the students at the School and minor adherents and congregants of the Church allegedly engaged in by Donauer, including the:
 - (a) specific conduct that was allegedly engaged in by Donauer;
 - (b) dates or approximate dates on which such alleged conduct occurred;
 - (c) location of the alleged conduct; and
 - (d) the names of the alleged victims.

8. With respect to paragraph 49 of the Second Amended Statement of Claim, particulars of alleged incidences of Donauer using 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) specific threats that were allegedly made by Donauer;
 - (b) dates or approximate dates on which such alleged threats were made;
 - (c) location where the alleged threats were made; and
 - (d) the names of the recipients of the alleged threats.

9. With respect to paragraph 76 of the Second Amended Statement of Claim, particulars of the beliefs, faith, and lifestyle allegedly promoted by Donauer.

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

W LAW LLP

Per: 
Adam R. Touet
Solicitor for the Defendant,
Randy Donauer

CONTACT INFORMATION AND ADDRESS FOR SERVICE:

Name of party or party's lawyer:	Adam Touet
Address:	W Law LLP 1100, 122 1st Ave. S., Saskatoon, SK S7K 7E5
Telephone number:	306-244-2242
Fax number (if any):	306-652-0332
Email address (if any):	atouet@wlaw.com