

COURT FILE NUMBER **QBG – SA - 00766 of 2022**

COURT OF KING’S BENCH FOR SASKATCHEWAN

(FAMILY LAW DIVISION)

JUDICIAL CENTRE SASKATOON

PLAINTIFF **CAITLIN 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, FARN 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 JOHN OLUBOBOKUN

TAKE NOTICE THAT pursuant to rule 3-71 of *The King’s Bench Rules*, the Defendant, **JOHN OLUBOBOKUN**, 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 47(a)(i)(1), particulars of the alleged punishment, including:
 - a. In addition to the named Plaintiff, Caitlin Erickson, the identity of others punished on that same occasion;
 - b. Specifically which of the named defendants, including John Olubobokun, punished which plaintiffs?
 - c. Where it is alleged that the plaintiffs were “stricken repeatedly on the buttocks”, how many times were each of the plaintiffs struck, and by whom?

2. With respect to paragraph 47(a)(i)(2), particulars of the allegation that the Defendant John Olubobokun was kicked out of Coy Nolin's hospital room and that the Plaintiff Caitlin Erickson was subsequently spanked or paddled, including:
 - a. Why is it that Coy Nolin was allegedly hospitalized?
 - b. Why was the Defendant John Olubobokun kicked out of Coy Nolin's hospital room, and by whom?
 - c. When is it alleged that John Olubobokun demanded the identity of the nurse in question?
 - d. When did John Olubobokun allegedly spank or paddle Caitlin Erickson?

3. With respect to paragraph 47(a)(i)(3), further particulars including:
 - a. Who allegedly directed punishment for "not trying hard enough" or "having an attitude", and who administered the punishment and on how many occasions?
 - b. What year was the Plaintiffs Caitlin Erickson's Grade 12 year and in what month did the occasions giving rise to corporal punishment take place?
 - c. Specifically regarding the occasion when the Plaintiff Caitlin Erickson was struck on the leg, causing her to limp:
 - i. Who allegedly inflicted the punishment on that occasion?
 - ii. When, and why, was that particular punishment allegedly inflicted upon Caitlin?

4. With respect to paragraph 47(b)(i)(2), further particulars including:
 - a. Where, and in what month and year did the alleged corporal punishment take place?
 - b. Is the reference to a "spanking" intended to convey that the punishment was different from the other alleged incidents of corporal punishment wherein a paddle was used?

5. With respect to paragraph 47(b)(i)(3), further particulars including:
 - a. In what month and year did this alleged incident of corporal punishment take place?

- b. How did the “revelation” of Coy Nolin’s homosexuality come about, and is that revelation merely coincidental to the timing of the alleged corporal punishment, or is there allegedly a causal connection between the revelation and the punishment?
 - c. Why, and upon whose invitation, were John and Simbo Olubobokun at Coy Nolin’s home?
 - d. What, if anything, gave rise to the alleged punishment at Coy Nolin’s home?
 - e. What did the defendant John Olubobokun allegedly use to inflict the paddling upon Coy Nolin?
 - f. How many times does the Plaintiff Coy Nolin claim to have been paddled on that occasion?
 - g. If a “paddle” was used, is it alleged that the defendant John Olubobokun, or some other defendant, brought the paddle to Coy Nolin’s home, or was the paddle already at the home?
6. With respect to paragraph 47(b)(i)(4), further particulars including:
 - a. The number, instances, and reasons why Coy Nolin was “struck in the area of the buttocks with a paddle”, and by whom, and on what dates?
7. With respect to paragraph 47(b)(ii), further particulars including:
 - a. When, and where, and for what purpose, did the alleged exorcism take place?
 - b. Did Coy Nolin and/or a parent or guardian on his behalf, consent to the alleged exorcism, cooperate with or facilitate the alleged exorcism in any way?
 - c. What is the “physical contact” to which Coy Nolin alleges he was subject to during the course of the alleged exorcism?
8. With respect to paragraphs 47(c) through 47(1.1), further particulars including:
 - a. Do any of these general allegations apply to the Defendant John Olubobokun and, if so,
 - i. In respect to which of these incidents is it alleged that the Defendant, John Olubobokun, is responsible in any way, and if so:

1. The dates and particulars of each incident and each plaintiff;
9. With respect to paragraph 47(m), further particulars including:
 - a. Who among the plaintiffs alleges that this incident took place?
 - b. Is the plaintiff making the allegation the same person as “a student” referred to in the allegation?
 - c. When and where did the alleged incident take place?
 - d. In what manner is it alleged that the defendant, John Olubobokun, directed Garrett Johnson to do anything and, in particular, what was Garrett Johnson being directed to do?
 10. With respect to paragraph 48(a)(v), further particulars, including:
 - a. Where and when did the alleged interrogation of Caitlin Erickson take place, and what, if any, incident gave rise to the interrogation?
 - b. Was the alleged coercion effective insofar as the plaintiff Caitlin Erickson subsequently divulged information and, if so, what information was divulged?
 - c. Alternatively, if the Plaintiff Caitlin Erickson did not divulge any information, what information was she withholding for the apparent purpose of protecting “other students and minor adherents and congregants of the Church”?
 - d. Is the reference to “the Church” intended to distinguish these allegations from other allegations pertaining to the defendant John Olubobokun’s role in “the school”?
 11. With respect to paragraph 48(b)(i), further particulars including:
 - a. In what manner does the plaintiff Coy Nolin claim to have been “intimidated and coerced”?
 - b. Was the alleged intimidation and coercion successful in that the plaintiff felt obliged to reveal the identity of “the other student”?
 - c. If such alleged intimidation and coercion was unsuccessful, then what consequences, if any, resulted from the plaintiff’s effective resistance?

- d. Was Coy Nolin in fact expelled from the school? If so, was the expulsion in writing, and who authorized his expulsion?
- e. Did Coy Nolin contact any other student in respect to the alleged inquiries, and, if so, does he have any knowledge as to whether or not the plaintiff, John Olubobokun, contacted the police?
- f. Is the description of John Olubobokun's attendance at Coy's home merely an elaboration of the allegations pertaining to an exorcism earlier referenced in paragraph 47(b)(i)(3) and 47(b)(ii), or is it alleged or implied that there may have been a second such incident?
- g. Does Coy Nolin know what "special church" he was to be moved to in Edmonton and, if so, did he in fact attend the "special church"?
- h. Do any of the other general allegations set out in paragraph 48 pertain to the Defendant, John Olubobokun, or are the specific allegations naming the Defendant John Olubobokun a comprehensive enumeration of the allegations against him?
- i. If the general allegations in paragraph 48 do pertain to the Defendant, John Olubobokun, in addition to the specific allegations in respect to which John Olubobokun is specifically named, then further particulars including:
 - i. Where, when, against whom, and in what manner is it alleged that the Defendant, John Olubobokun "...engaged in the intentional infliction of mental injury and conduct in the nature of trespass to the person, including psychological, mental, emotional and spiritual harm"?

12. With respect to paragraph 49, further particulars, including:

- a. Where and when and why the incident alleged in subparagraph 49(a)(i) took place;
- b. Do the general allegations otherwise enumerated in paragraph 49 pertain to the Defendant, John Olubobokun, in addition to the specific allegation in paragraph 49(a)(i) and, if so, where, when, against whom and under what circumstances is it alleged that the Defendant, John Olubobokun, "...used the threat of Physical Abuse and Non-Physical Abuse to intentionally inflict mental injury on, and

intimidate and coerce students of the School and minor adherents and congregants of the Church...”?

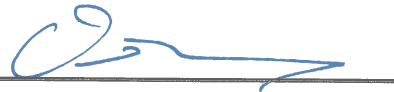
13. With respect to paragraphs 50 through 77 of the Statement of Claim, further particulars, including:

- a. Any other word or deed, including alleged conspiracies, or simple neglect, attributable to the Defendant John Olubobokun, including particulars of when, where and against whom such actions or neglect pertained, along with the associated harms, whether physical, emotional, psychological or spiritual, suffered by each and every plaintiff.

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

WARDELL GILLIS

Per: _____



Daniel N. Tangjerd,
Solicitor for the Defendant, John Olubobokun

This document was prepared by:
Wardell Gillis | Barristers & Solicitors
2306 Arlington Avenue | Saskatoon, SK | S7J 3L3
Attention: Daniel N. Tangjerd | Telephone: (306) 956-3338 | Facsimile: (306) 956-2228
Address for Service: Same as Above