

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 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 OF ANNE MACMILLAN**

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

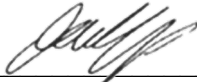
1. With respect to paragraphs 31(a) and 70 of the Amended Claim, particulars of any incident of alleged negligence, alleged gross negligence, alleged breach of any duty of care, and any alleged harm committed by Anne, including the:
  - a. Names of the alleged victims;

- b. Location of the incident(s); and
  - c. Time frames and dates on which the alleged conduct occurred.
2. With respect to paragraphs 31(a) and 73-74 of the Amended Claim, particulars of any incident of alleged breach of fiduciary duty committed by Anne, including the:
  - a. Names of the alleged victims;
  - b. Location of the incident(s); and
  - c. Time frames and dates on which the alleged conduct occurred.
3. With respect to paragraph 31(a) of the Amended Claim, particulars of any incident of alleged assault and/or battery committed by Anne, including:
  - a. Names of the alleged victims;
  - b. Location of the incident(s); and
  - c. Time frames and dates on which such alleged conduct occurred.
4. With respect to paragraph 31(a) of the Amended Claim, particulars of any incident of alleged infliction of mental suffering committed by Anne, including:
  - a. Names of the alleged victims;
  - b. Location of the incident(s); and
  - c. Time frames and dates on which such alleged conduct occurred.
5. With respect to paragraph 31(a) of the Amended Claim, particulars of any incident of alleged conspiracy to injure students involving Anne, including:
  - a. Names of the alleged victims;
  - b. Location of the incident(s);

- c. Time frames and dates on which such alleged conduct occurred; and
  - d. Names of alleged co-conspirators.
6. With respect to paragraphs 45 and 46 of the Amended Claim, particulars of the alleged incidents of corporal punishment allegedly observed by Anne, including the:
  - a. Names of the alleged victims;
  - b. Location of the incident(s); and
  - c. Time frames and dates on which such alleged conduct occurred.
7. With respect to paragraphs 47 and 48 of the Amended Claim, particulars of Anne's alleged abuse in regard to trespass to the person, intentional infliction of mental injury, physical or sexual assault and/or battery of students, minor adherents and congregants of the Church, including the:
  - a. Names of the alleged victims;
  - b. Location of the incident(s); and
  - c. Time frames and dates on which such alleged conduct occurred.
8. With respect to paragraphs 49 and 60-62 of the Amended Claim, particulars of Anne's alleged conspiracy and/or use of 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. Names of the alleged victims;
  - b. Location of the incident(s);
  - c. Time frames and dates on which such alleged conduct occurred; and
  - d. The identity of any alleged co-conspirators.

DATED at Saskatoon, Saskatchewan, this 31st day of October, 2023.

**ROBERTSON STROMBERG LLP**

Per:   
\_\_\_\_\_  
Jared D. Epp,  
Solicitor for the Defendants  
Kevin MacMillan and Anne MacMillan

This *Request for Particulars* delivered by:

**ROBERTSON  
STROMBERG**

**ROBERTSON STROMBERG LLP**

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