

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

**REQUEST FOR PARTICULARS**

TAKE NOTICE that, pursuant to Rule 3-71 and the fiat of Bardai J., dated September 15, 2023, the Defendant, Joel Hall (“Joel”), requires that you, by December 31, 2023, deliver to him a further and better statement of the nature of your claim, the particulars of which are as follows:

1. Generally, particulars for each claim made against the Individually Named Defendants in the Second Amended Statement of Claim as it pertains to Joel, including:
  - a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place;
  - d. The names of the alleged victims;
  - e. The nature of Joel’s involvement in the alleged incidents; and

- f. The specific action which Joel is alleged to have taken leading to the alleged harm caused.

Without limiting the generality of the foregoing:

2. With respect to paragraph 41 of the Second Amended Statement of Claim, details of the principles referred to therein and of the manner in which Joel is alleged to have carried them out, including:
  - a. The manner in which these principles were allegedly communicated to Joel;
  - b. Joel's alleged agreement with these principles, whether express or implied;
  - c. The manner in which Joel allegedly carried out these principles;
  - d. Dates or approximate dates on which Joel allegedly carried out these principles;
  - e. The location of each alleged incident of Joel carrying out these principles;
  - f. The names of the individuals who Joel allegedly carried out these principles upon; and
  - g. The names of the individuals who allegedly witnessed Joel carrying out these principles.
3. With respect to paragraphs 45 & 46 of the Second Amended Statement of Claim, particulars of the corporal punishment allegedly observed by Joel, including the:
  - a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place;
  - d. The names of the alleged victims;
  - e. The capacity in which Joel was present at the alleged incidents; and
  - f. The names of the individuals who witnessed Joel present at the alleged incidents.
4. With respect to paragraph 46.2 of the Second Amended Statement of Claim, details of the physical, psychological, emotional, and religious abuse which Joel is alleged to have carried out, including the:
  - a. Frequency;
  - b. Location;

- c. Dates or approximate dates on which such alleged conduct took place;
  - d. The names of the alleged victims; and
  - e. The actions which Joel is alleged to have taken amounting to physical, psychological, emotional, or religious abuse.
5. With respect to paragraph 47(b)(i)(4) of the Second Amended Statement of Claim, particulars of the alleged incidents of Joel striking Coy Nolin with a paddle, including:
  - a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place;
  - d. Details of Joel's alleged presence at the incidents;
  - e. Details of Joel's alleged role in the incidents.
6. With respect to paragraph 47(c) of the Second Amended Statement of Claim, particulars of the alleged incidents of Joel physically striking students and minor adherents and congregants of the Church as a disciplinary response to the behaviour noted therein, including:
  - a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place; and
  - d. The names of the alleged victims.
7. With respect to paragraph 47(f) of the Second Amended Statement of Claim, details of Joel allegedly taking the student to be paddled, including:
  - a. Dates or approximate dates on which such alleged conduct took place;
  - b. The name of the alleged victim;
  - c. The name of the individual who allegedly paddled the student; and
  - d. The nature of Joel's involvement with the alleged paddling.
8. With respect to paragraph 47(l) and 47(l.1) of the Second Amended Statement of Claim, details of the conduct Joel is alleged to have engaged in, including:
  - a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place;

- d. The names of the alleged victims;
  - e. The nature of the alleged physical tasks;
  - f. The nature of the alleged disabilities;
  - g. The relationship between the alleged physical tasks and the performance standards mentioned;
  - h. The relationship between the alleged “wall sit” mentioned in 47(1.1) and the allegation against Joel in 47(1);
9. With respect to paragraph 48 of the Second Amended Statement of Claim, particulars of Joel’s alleged abuse in the nature of intentional infliction of mental injury, the nature of trespass to the person, and the intentional infliction of mental, psychological, emotional, and spiritual harm to the students at the School and minor adherents and congregants of the Church, including:
- a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place;
  - d. The names of the alleged victims; and
  - e. The actions which Joel is alleged to have taken which amount to alleged abuse in the natures noted above.
10. With respect to paragraph 48(a), particulars of Joel’s involvement in each allegation listed in clauses 48(a)(i) through 48(a)(vi), including:
- a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place; and
  - d. The specific actions which Joel is alleged to have taken amounting to the claims noted therein.
11. With respect to paragraph 48(d), particulars of Joel’s alleged involvement in the excommunication of members of the Plaintiff Classes, including:
- a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place;
  - d. The names of the alleged victims; and

- e. The nature of Joel's alleged involvement in the alleged excommunication incidents.
12. With respect to paragraph 48(g), particulars of the alleged incidents of Joel insulting, degrading, demeaning and humiliating members of the Plaintiff Classes, including:
- a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place;
  - d. The names of the alleged victims; and
  - e. Details of what Joel is alleged to have said.
13. With respect to paragraph 48(h), particulars of the alleged incidents of Joel threatening separation of members of the Plaintiff Classes from their siblings, including:
- a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place;
  - d. The names of the alleged victims; and
  - e. Details of what Joel is alleged to have said amounted to the treats noted therein.
14. With respect to paragraph 48(i), particulars of the alleged incidents of Joel isolating members of the Plaintiff Classes, including:
- a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place;
  - d. The names of the alleged victims;
  - e. The nature of the alleged isolation;
  - f. The nature of Joel's involvement in the alleged incidents.
15. With respect to paragraph 48(j), particulars of the alleged incidents of Joel refusing to assist "bad" students, including:
- a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place; and

- d. The names of the alleged victims.
16. With respect to paragraph 48(k), particulars of the alleged incidents of Joel refusing to assist students with learning disabilities, including:
- a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place; and
  - d. The names of the alleged victims.
17. With respect to paragraph 48(m.2), particulars of the alleged incidents of Joel refusing to allow students to use the washroom, including:
- a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place; and
  - d. The names of the alleged victims.
18. With respect to paragraph 48(m.3) through paragraph 48(m.5), particulars of the alleged incidents of Joel subjecting members of the Plaintiff Classes to physical abuse, intimidation abuse, and non-physical abuse and forcing members of the Plaintiff Classes to witness the same, including:
- a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place;
  - d. The names of the alleged victims;
  - e. The specific actions which Joel is alleged to have taken amounting to physical abuse, intimidation abuse, or non-physical abuse of the Plaintiff Classes; and
  - f. The specific actions which Joel is alleged to have taken amounting to “forcing” members of the Plaintiff to witness the alleged conduct noted therein.
19. With respect to paragraph 48(m.6), particulars of the alleged incidents of Joel effecting harm on members of the Plaintiff Classes by intimidating, coercing, and demanding financial contribution from their families, including:
- a. Frequency;
  - b. Location;

- c. Dates or approximate dates on which such alleged conduct took place;
  - d. The names of the alleged victims;
  - e. The names of the alleged family members;
  - f. Details of what Joel is alleged to have said amounting to intimidation, coercion, or demanding financial contribution from their families.
20. With respect to paragraph 48(m.7), particulars of the alleged incidents of Joel speaking to the female student, including:
- a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place;
  - d. The names of the alleged victims; and
  - e. The nature of Joel's involvement in this incident.
21. With respect to paragraph 48(m.9), particulars of the alleged incidents of Joel refusing to allow children to change into clean clothes, including:
- a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place;
  - d. The names of the alleged victims;
  - e. Details of the specific conversation that is alleged to have occurred wherein Joel stated such refusal.
22. With respect to paragraph 49, particulars of the alleged incidents of Joel using the threat of physical abuse and non-physical abuse to intentionally inflict mental injury on, intimidate or coerce students and minor adherents and congregants of the Church, including:
- a. Frequency;
  - b. Location;
  - c. Dates or approximate dates on which such alleged conduct took place;
  - d. The names of the alleged victims;
  - e. Details of what Joel is alleged to have said amounting to a threat of physical abuse and non-physical abuse;

- f. Details of the manner in which Joel is alleged to have used such a threat to inflict mental injury, intimidate or coerce students and minor adherents and congregants of the Church.

**NOTICE**

If you intend to make a reply to this Request for Particulars, you must serve and file the reply within eight (8) days after the service of this Request.

DATED at the City of Saskatoon, in the Province of Saskatchewan, this 31<sup>st</sup> day of October, 2023.

**PANKO COLLABORATIVE LAW & MEDIATION**



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

Charmaine Panko, K.C., Solicitor for the  
Defendant, Joel Hall

**CONTACT INFORMATION AND ADDRESS FOR SERVICE**

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