

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 KEVIN MACMILLAN

TAKE NOTICE that pursuant to Rule 3-71 of *The King's Bench Rules*, the Defendant, Kevin MacMillan ("Kevin"), 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 Kevin, 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 Kevin, 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 Kevin, 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 Kevin, 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 Kevin, 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 Kevin, 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 Kevin'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 Kevin'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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