

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, 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**

### **REPLY TO REQUEST FOR PARTICULARS**

The Plaintiffs, Caitlin Erickson, Jennifer Soucy (Beaudry), and Stefanie Hutchinson, hereby reply as follows to the Defendant's, Mile Two Church Inc.'s, Request for Particulars, dated October 30, 2023:

**The Plaintiffs state that some or all of the Request for Particulars of Mile Two Church Inc. ("Mile Two") is an abuse of process calculated to, and in fact accomplishing the improper objective of, increasing the time and expense of the Plaintiffs by:**

- a. Requesting particulars which are matter of evidence and not pleadings;**
- b. Requesting particulars where Mile Two, and its employees, agents and representatives, clearly have better knowledge of the particulars requested;**
- c. Requesting particulars which are not required to plead intelligently;**
- d. Requesting particulars which, in the context of a class action, are not known or could not be known to the Plaintiffs;**

- e. Requesting particulars which, in the context of a pre-certification request for particulars in a class action, are not required for Mile Two to understand “at least in broad strokes what the plaintiff’s case is about”; and
- f. Requesting particulars which are resolved by *reading* the Second Amended Statement of Claim.

In doing so, the only natural inference is that Mile Two has undertaken its Request for Particulars for the improper purpose of causing the Plaintiffs to waste time and incur unnecessary expense. The conduct of Mile Two amounts to contempt for the foundational rules of Court, which compel parties to:

- a. identify or make an application to identify the real issues in dispute and facilitate the quickest means of resolving the claim at the least expense; and
- b. refrain from ... taking proceedings that do not further the purpose and intention of these rules.

This contempt had previously been demonstrated in the representation of Mile Two before the Honourable Justice N. Bardai, in which Mile Two advised the Court that if required to file a defence pre-certification, Mile Two would file a bare defence which would not be of any assistance to the Court or the parties.

The Plaintiffs’ disappointment and disapproval with the contempt of Mile Two cannot be understated.

The Plaintiffs state generally that the nature of class action litigation is that not all instances of conduct captured by the conduct pleaded in the Second Amended Statement of Claim are, or can be, known to the Plaintiffs and that in this regard the Second Amended Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about” with respect to all of the particulars requested (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

The Plaintiffs state that particulars requiring identifying the identification of perpetrator, victim, and date of each and every incident of abuse carried out by the Defendants against members of the Plaintiff Classes, which occurred over a span of 1982

**to present, is not reasonable, appropriate or consistent with either the general rules of pleadings or the rules of pleadings in a class action. Further, such requests for particulars are contrary to the purpose of class proceedings as a whole, and particularly respecting class proceedings prior to certification. Particularly pre-certification, the Class Plaintiffs do not, and can not, know of all conduct carried out against all of the Plaintiff Classes.**

**The Plaintiffs state that the Second Amended Statement of Claim speaks for itself with respect to the allegations.**

**The Plaintiffs state that the Second Amended Statement of Claim speaks for itself with respect to the individuals who were the victims of and suffered damages as a result of the allegations.**

**The Plaintiffs state that all of the conduct alleged in the Second Amended Statement of Claim occurred in the Province of Saskatchewan during the period from 1982 to present.**

1. With respect to paragraphs 15 to 17 of the Second Amended Statement of Claim dated June 29, 2023 (the “Claim”), particulars of the allegation that Tracey Johnson, Simbo Olubobokun, and Elaine Schultz purported to be counsellors for the students and members of the school and church operated by Mile Two Church Inc. (“Mile Two”).

**Reply:**

**The Plaintiffs reply as follows:**

**The Plaintiffs state that Tracey Johnson (“Tracey”), Simbo Olubobokun (“Simbo”) and Elaine Schultz (“Elaine”) referred to themselves and were referred by Mile Two, its employees, agents and representatives, including but not limited to the Principal Defendants, to parents of minors attending the school and parents of minor congregants and adherents of the church, as counsellors for minor attendees and congregants of the church and school operated by Mile Two. Such references included, but were not limited to:**

- a. identifying Tracey, Simbo and Elaine as counsellors to minor attendees and congregants of the church and students of the school;

- b. recommending that minor attendees and congregants of the church and students at the school speak with and disclose issues and personal challenges to Tracey, Simbo, and Elaine for personal, emotional, mental and spiritual guidance and direction;**
- c. directing minor attendees and congregants of the church and students at the school to speak with and disclose issues and personal challenges to Tracey, Simbo, and Elaine for personal, emotional, mental and spiritual guidance and direction;**
- d. recommending against discussing issues or personal challenges with individuals other than those individuals identified by Mile Two, its employees, agents and representatives as proper individuals for guidance and direction, which identified individuals included but were not limited to Tracey, Simbo, and Elaine.**

**Further, it is anticipated that further particulars as to how Tracey, Simbo and Elaine purported, or were purported to be counsellors will be discovered through disclosure and questioning in the action.**

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).**

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is**

**required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

2. With respect to paragraph 22 of the Claim, particulars of the identity or identities of the individual(s) or entitles who allegedly promoted and advocated for Nathan Schultz as a babysitter.

**Reply:**

**The Plaintiffs reply as follows:**

**The Plaintiffs state that Nathan Schultz was promoted and advocated for as a babysitter by the Defendants.**

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

3. With respect to paragraph 22 of the Claim, particulars concerning the nature of the promotion and advocacy alleged.

**Reply:**

**The Plaintiffs reply as follows:**

**The Plaintiffs state that Nathan Schultz was referred to, promoted and advocated for as a babysitter by Mile Two, through its employees, agents and representatives, including but not limited to the Principal Defendants, in that Mile Two maintained a list of approved babysitters, and made statements both public and private to members of the Mile Two congregation and parents of the school that:**

- a. Where babysitting was required, parents should use babysitters approved by Mile Two or the Principal Defendants;**
- b. Babysitting by individuals who were not approved by Mile Two or the Principal Defendants should be avoided;**
- c. Engaging babysitters not approved by Mile Two or the Principal Defendants was contrary to the will of God, Mile Two, and the Principal Defendants, and/or would be harmful to the child who was to be babysat; and**
- d. On an *ad hoc* basis that certain individuals not on the list of approved babysitters were approved by Mile Two and/or the Principal Defendants to babysit children of members of the congregation of the church and/or students of the school.**

**Further, it is anticipated that further particulars as to how Tracey, Simbo and Elaine purported, or were purported to be counsellors will be discovered through disclosure and questioning in the action.**

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

4. With respect to paragraph 25.2 of the Claim, particulars of the allegation that Randy Donauer acted as an agent of the church operated by Mile Two.

**Reply:**

**The Plaintiffs reply as follows:**

**The Second Amended Statement of Claim speaks for itself in that at paragraph 27 Randy Donauer is alleged to be a Principal Defendant, alleging Randy Donauer to have been a director or officer of Mile Two or its predecessors, director or principal of the School, Elder of the Church, and/or employee, representative or agent of Mile Two or its predecessors, the School and/or the Church.**

**In addition, the Second Amended Statement of Claim, at paragraph 28, alleges that Randy Donauer was “instrumental in the development and implementation**

of the policies and procedures undertaken by Mile Two Church Inc. and its employees, agents and representatives in the Church and the School”. The said policies and procedures were with respect to the principles referenced throughout the Second Amended Statement of Claim, including at paragraph 41, which principles include but are not limited to:

1. The systematic oppression, intimidation, and abuse of children;
2. The requirement of unquestioning obedience and compliance by children through intimidation, coercion, isolation, fear, and threat of physical abuse;
3. Total control of students’ lives both inside and outside of the School and Church setting;
4. The use of corporal punishment on children for all manner of conduct, including trifling and trivial conduct;
5. The vilification and detestation of the LGBTQ+ community;
6. Complete isolationism and condemnation of anything not considered a part of or approved by the Church and its leadership;
7. The vilification and detestation of anyone that is not a member of the Church and/or School;
8. The breaking up of families where a member of the family was not wholly subservient to the Church;
9. Promotion of a distrust and opposition to post-secondary education and authority outside of that offered by the Church and/or School;
10. The promotion of isolationist ideology and practice, including the cover-up of alleged tortious, illegal and other wrongful acts by members of the Church and/or School such as sexual abuse;
11. Such further and other promulgated principles as are currently unknown, but may be discovered during the course of this litigation; and
12. That the above promulgated principles are God’s will.

In addition:



**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

5. With respect to paragraph 26(c) of the Claim, particulars of the physical, sexual, psychological, emotional, mental, or spiritual abuse allegedly perpetrated against the students attending the school operated by Mile Two, including the:
  - a. Identity or identities of the alleged victims of the alleged conduct;
  - b. Nature of the alleged abuse;
  - c. Dates or approximate dates on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

**The Plaintiffs state that paragraph 26 of the Second Amended Statement of Claim speaks for itself, in that the paragraph as a whole describes the “[A]dditional John Does and Jane Does” against whom allegations have been made in the Second Amended Statement of Claim, which include the categories of individuals who are**

defined as “Unidentified Corporate Officers”, “Unidentified Church Elders”, “Unidentified School Abusers”, “Unidentified Church Abusers”, “Unidentified School Abuse Planners”, and “Unidentified Church Abuse Planners”, all of whom together form the category of individuals defined as “Unidentified Parties”. The particulars of the conduct described in identifying the above noted categories of individuals are set out throughout the Second Amended Statement of Claim.

The identity or identities of the alleged victims of the alleged conduct is set out throughout the Second Amended Statement of Claim.

The nature of the alleged abuse is set out throughout the Second Amended Statement of Claim.

The dates or approximate dates on which such alleged conduct occurred is set out throughout the Second Amended Statement of Claim, and span the period from 1982 to present.

**In addition:**

The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

6. With respect to paragraph 26(d) of the Claim particulars of the physical, sexual, psychological, emotional, mental, or spiritual abuse allegedly perpetrated against the students attending the school operated by Mile Two, including the:
  - a. Identity or identities of the alleged victims of the alleged conduct;
  - b. Nature of the alleged abuse;
  - c. Dates or approximate dates on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

**The Plaintiffs state that paragraph 26 of the Second Amended Statement of Claim speaks for itself, in that the paragraph as a whole describes the “[A]dditional John Does and Jane Does” against whom allegations have been made in the Second Amended Statement of Claim, which include the categories of individuals who are defined as “Unidentified Corporate Officers”, “Unidentified Church Elders”, “Unidentified School Abusers”, “Unidentified Church Abusers”, “Unidentified School Abuse Planners”, and “Unidentified Church Abuse Planners”, all of whom together form the category of individuals defined as “Unidentified Parties”. The particulars of the conduct described in identifying the above noted categories of individuals are set out throughout the Second Amended Statement of Claim.**

**The identity or identities of the alleged victims of the alleged conduct is set out throughout the Second Amended Statement of Claim.**

**The nature of the alleged abuse is set out throughout the Second Amended Statement of Claim.**

**The dates or approximate dates on which such alleged conduct occurred is set out throughout the Second Amended Statement of Claim, and span the period from 1982 to present.**

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).**

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

7. With respect to paragraph 26(e), the particulars of the policies and procedures allegedly formulated for the abuse of students attending the school operated by Mile Two or its predecessors, including:
  - a. Identification of the policies and procedures referred to;
  - b. The effective date(s) of such policies and procedures; and

- c. The identities of the employees, representatives, or agents of Mile Two or its predecessors that are alleged to have formulated the policies and procedures referred to.

**Reply:**

**The Plaintiffs reply as follows:**

**The Plaintiffs state that paragraph 26 of the Second Amended Statement of Claim speaks for itself, in that the paragraph as a whole describes the “[A]dditional John Does and Jane Does” against whom allegations have been made in the Second Amended Statement of Claim, which include the categories of individuals who are defined as “Unidentified Corporate Officers”, “Unidentified Church Elders”, “Unidentified School Abusers”, “Unidentified Church Abusers”, “Unidentified School Abuse Planners”, and “Unidentified Church Abuse Planners”, all of whom together form the category of individuals defined as “Unidentified Parties”. The particulars of the conduct described in identifying the above noted categories of individuals are set out throughout the Second Amended Statement of Claim.**

**The policies and procedures referenced at paragraph 26(e) of the Second Amended Statement of Claim are those policies and procedures enacted and utilized in furtherance of the principles referred to throughout the Second Amended Statement of Claim, including without limitation at paragraphs 41, which include but are not limited to:**

- 1. The systematic oppression, intimidation, and abuse of children;**
- 2. The requirement of unquestioning obedience and compliance by children through intimidation, coercion, isolation, fear, and threat of physical abuse;**
- 3. Total control of students’ lives both inside and outside of the School and Church setting;**
- 4. The use of corporal punishment on children for all manner of conduct, including trifling and trivial conduct;**

5. The vilification and detestation of the LGBTQ+ community;
6. Complete isolationism and condemnation of anything not considered a part of or approved by the Church and its leadership;
7. The vilification and detestation of anyone that is not a member of the Church and/or School;
8. The breaking up of families where a member of the family was not wholly subservient to the Church;
9. Promotion of a distrust and opposition to post-secondary education and authority outside of that offered by the Church and/or School;
10. The promotion of isolationist ideology and practice, including the cover-up of alleged tortious, illegal and other wrongful acts by members of the Church and/or School such as sexual abuse;
11. Such further and other promulgated principles as are currently unknown, but may be discovered during the course of this litigation; and
12. That the above promulgated principles are God's will.

The identities of the employees, representatives of agents of Mile Two or its predecessors that are alleged to have formulated the policies and procedures are those individuals alleged to have formulated the policies and procedures as pled in the Second Amended Statement of Claim.

**In addition:**

The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

8. With respect to paragraph 26(f) of the Claim, particulars of the policies and procedures allegedly formulated for the abuse of minor members of the church operated by Mile Two or its predecessors, including the:
  - a. Identification of the policies and procedures referred to;
  - b. The effective date(s) of such policies and procedures; and
  - c. The identities of the employees, representatives, or agents of Mile Two or its predecessors that are alleged to have formulated the policies and procedures referred to.

**Reply:**

**The Plaintiffs reply as follows:**

**The Plaintiffs state that paragraph 26 of the Second Amended Statement of Claim speaks for itself, in that the paragraph as a whole describes the “[A]dditional John Does and Jane Does” against whom allegations have been made in the Second Amended Statement of Claim, which include the categories of individuals who are defined as “Unidentified Corporate Officers”, “Unidentified Church Elders”, “Unidentified School Abusers”, “Unidentified Church Abusers”, “Unidentified School Abuse Planners”, and “Unidentified Church Abuse Planners”, all of whom together form the category of individuals defined as “Unidentified Parties”. The particulars of the policies and procedures are set out throughout the Second**

**Amended Statement of Claim, including but not limited to paragraph 42 of the Second Amended Statement of Claim.**

**The policies and procedures referenced at paragraph 26(f) of the Second Amended Statement of Claim are those policies and procedures enacted and utilized in furtherance of the principles referred to throughout the Second Amended Statement of Claim, including without limitation at paragraphs 41, which include but are not limited to:**

- 1. The systematic oppression, intimidation, and abuse of children;**
- 2. The requirement of unquestioning obedience and compliance by children through intimidation, coercion, isolation, fear, and threat of physical abuse;**
- 3. Total control of students' lives both inside and outside of the School and Church setting;**
- 4. The use of corporal punishment on children for all manner of conduct, including trifling and trivial conduct;**
- 5. The vilification and detestation of the LGBTQ+ community;**
- 6. Complete isolationism and condemnation of anything not considered a part of or approved by the Church and its leadership;**
- 7. The vilification and detestation of anyone that is not a member of the Church and/or School;**
- 8. The breaking up of families where a member of the family was not wholly subservient to the Church;**
- 9. Promotion of a distrust and opposition to post-secondary education and authority outside of that offered by the Church and/or School;**
- 10. The promotion of isolationist ideology and practice, including the cover-up of alleged tortious, illegal and other wrongful acts by members of the Church and/or School such as sexual abuse;**
- 11. Such further and other promulgated principles as are currently unknown, but may be discovered during the course of this litigation; and**



**12. That the above promulgated principles are God's will.**

**The identities of the employees, representatives of agents of Mile Two or its predecessors that are alleged to have formulated the policies and procedures are the Principal Defendants.**

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).**

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff's case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

9. With respect to paragraph 28 of the Claim, particulars of the alleged policies and procedures referred to, including the identification of the policies and procedures referred to, and their effective dates.

**Reply:**

**The Plaintiffs reply as follows:**

**The policies and procedures referenced at paragraph 28 of the Second Amended Statement of Claim are those policies and procedures enacted and utilized in furtherance of the principles referred to throughout the Second Amended Statement of Claim, including without limitation at paragraphs 41, which include but are not limited to:**

- 1. The systematic oppression, intimidation, and abuse of children;**
- 2. The requirement of unquestioning obedience and compliance by children through intimidation, coercion, isolation, fear, and threat of physical abuse;**
- 3. Total control of students' lives both inside and outside of the School and Church setting;**
- 4. The use of corporal punishment on children for all manner of conduct, including trifling and trivial conduct;**
- 5. The vilification and detestation of the LGBTQ+ community;**
- 6. Complete isolationism and condemnation of anything not considered a part of or approved by the Church and its leadership;**
- 7. The vilification and detestation of anyone that is not a member of the Church and/or School;**
- 8. The breaking up of families where a member of the family was not wholly subservient to the Church;**
- 9. Promotion of a distrust and opposition to post-secondary education and authority outside of that offered by the Church and/or School;**
- 10. The promotion of isolationist ideology and practice, including the cover-up of alleged tortious, illegal and other wrongful acts by members of the Church and/or School such as sexual abuse;**
- 11. Such further and other promulgated principles as are currently unknown, but may be discovered during the course of this litigation; and**
- 12. That the above promulgated principles are God's will.**

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

10. With respect to paragraph 39 of the Claim, particulars of the alleged objectives and teachings of the school and church operated by Mile Two, including:
  - a. Identification of the alleged objectives and teachings; and
  - b. Identification of the policies and procedures alleged to have been permeated by the alleged objectives and teachings, and their effective dates.

**Reply:**

**The Plaintiffs reply as follows:**

**The objectives, teachings, policies and procedures referenced at paragraph 39 of the Second Amended Statement of Claim are those objectives, teachings, policies and procedures enacted and utilized in furtherance of the principles referred to**

**throughout the Second Amended Statement of Claim, including without limitation at paragraphs 41, which include but are not limited to:**

- 1. The systematic oppression, intimidation, and abuse of children;**
- 2. The requirement of unquestioning obedience and compliance by children through intimidation, coercion, isolation, fear, and threat of physical abuse;**
- 3. Total control of students' lives both inside and outside of the School and Church setting;**
- 4. The use of corporal punishment on children for all manner of conduct, including trifling and trivial conduct;**
- 5. The vilification and detestation of the LGBTQ+ community;**
- 6. Complete isolationism and condemnation of anything not considered a part of or approved by the Church and its leadership;**
- 7. The vilification and detestation of anyone that is not a member of the Church and/or School;**
- 8. The breaking up of families where a member of the family was not wholly subservient to the Church;**
- 9. Promotion of a distrust and opposition to post-secondary education and authority outside of that offered by the Church and/or School;**
- 10. The promotion of isolationist ideology and practice, including the cover-up of alleged tortious, illegal and other wrongful acts by members of the Church and/or School such as sexual abuse;**
- 11. Such further and other promulgated principles as are currently unknown, but may be discovered during the course of this litigation; and**
- 12. That the above promulgated principles are God's will.**

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

11. With respect to paragraph 40 of the Claim, particulars of the identification of the objectives, policies, and procedures of the school and church operated by Mile Two that are alleged to have been influenced by the concept and practice of ensuring unquestioning obedience and compliance through intimidation, coercion, isolation, fear, and threat of physical abuse, including their effective dates.

**Reply:**

**The Plaintiffs reply as follows:**

**The objectives, policies and procedures referenced at paragraph 39 of the Second Amended Statement of Claim are those objectives, teachings, policies and procedures enacted and utilized in furtherance of the principles referred to throughout the Second Amended Statement of Claim, including without limitation at paragraphs 41, which include but are not limited to:**

- 1. The systematic oppression, intimidation, and abuse of children;**

2. The requirement of unquestioning obedience and compliance by children through intimidation, coercion, isolation, fear, and threat of physical abuse;
3. Total control of students' lives both inside and outside of the School and Church setting;
4. The use of corporal punishment on children for all manner of conduct, including trifling and trivial conduct;
5. The vilification and detestation of the LGBTQ+ community;
6. Complete isolationism and condemnation of anything not considered a part of or approved by the Church and its leadership;
7. The vilification and detestation of anyone that is not a member of the Church and/or School;
8. The breaking up of families where a member of the family was not wholly subservient to the Church;
9. Promotion of a distrust and opposition to post-secondary education and authority outside of that offered by the Church and/or School;
10. The promotion of isolationist ideology and practice, including the cover-up of alleged tortious, illegal and other wrongful acts by members of the Church and/or School such as sexual abuse;
11. Such further and other promulgated principles as are currently unknown, but may be discovered during the course of this litigation; and
12. That the above promulgated principles are God's will.

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

12. With respect to paragraph 41 of the Claim, particulars of the identification of the principles alleged to have promoted corporal discipline for all manner of conduct, including trifling and trivial conduct, including their effective dates.

**Reply:**

**The Plaintiffs reply as follows:**

**The principles referenced at paragraph 41 of the Second Amended Statement of Claim include, but are not limited to:**

- 1. The systematic oppression, intimidation, and abuse of children;**
- 2. The requirement of unquestioning obedience and compliance by children through intimidation, coercion, isolation, fear, and threat of physical abuse;**
- 3. Total control of students’ lives both inside and outside of the School and Church setting;**
- 4. The use of corporal punishment on children for all manner of conduct, including trifling and trivial conduct;**
- 5. The vilification and detestation of the LGBTQ+ community;**

6. Complete isolationism and condemnation of anything not considered a part of or approved by the Church and its leadership;
7. The vilification and detestation of anyone that is not a member of the Church and/or School;
8. The breaking up of families where a member of the family was not wholly subservient to the Church;
9. Promotion of a distrust and opposition to post-secondary education and authority outside of that offered by the Church and/or School;
10. The promotion of isolationist ideology and practice, including the cover-up of alleged tortious, illegal and other wrongful acts by members of the Church and/or School such as sexual abuse;
11. Such further and other promulgated principles as are currently unknown, but may be discovered during the course of this litigation; and
12. That the above promulgated principles are God's will.

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).**

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff's case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman***



*v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

13. With respect to paragraph 43 of the Claim, particulars of the allegedly abusive policies of the school and church operated by Mile Two, including the:
- a. Identification of such policies, and their effective dates; and
  - b. Particulars with respect to how the Principal Defendants, the Unidentified School Abuse Planners, and the Unidentified Church Abuse Planners (as those terms are defined in the Claim), caused other employees, agents, and representatives of Mile Two to carry out the allegedly abusive policies.

**Reply:**

**The Plaintiffs reply as follows:**

**The policies referenced at paragraph 43 of the Second Amended Statement of Claim are those policies furthering the principles referenced throughout the Second Amended Statement of Claim, including without limitation at paragraph 41, but are not limited to:**

- 1. The systematic oppression, intimidation, and abuse of children;**
- 2. The requirement of unquestioning obedience and compliance by children through intimidation, coercion, isolation, fear, and threat of physical abuse;**
- 3. Total control of students' lives both inside and outside of the School and Church setting;**
- 4. The use of corporal punishment on children for all manner of conduct, including trifling and trivial conduct;**
- 5. The vilification and detestation of the LGBTQ+ community;**
- 6. Complete isolationism and condemnation of anything not considered a part of or approved by the Church and its leadership;**

7. **The vilification and detestation of anyone that is not a member of the Church and/or School;**
8. **The breaking up of families where a member of the family was not wholly subservient to the Church;**
9. **Promotion of a distrust and opposition to post-secondary education and authority outside of that offered by the Church and/or School;**
10. **The promotion of isolationist ideology and practice, including the cover-up of alleged tortious, illegal and other wrongful acts by members of the Church and/or School such as sexual abuse;**
11. **Such further and other promulgated principles as are currently unknown, but may be discovered during the course of this litigation; and**
12. **That the above promulgated principles are God's will.**

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff's case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

14. With respect to paragraph 46 of the Claim, particulars of the alleged witnessing of corporal punishment that was calculated to further shame, humiliate, and degrade the child being punished, including the:

- a. Identity of the individuals alleged to have calculated that the witnessing of corporal punishment would further shame, humiliate, and degrade the child being punished; and
- b. Nature of the alleged additional and severe psychological, mental, emotional, and spiritual harm.

**Reply:**

**The Plaintiffs reply as follows:**

- a. **The Plaintiffs state that Second Amended Statement of Claim speaks for itself in that “Individually Named Defendants” and “Unidentified Parties” are possessive, and the allegation is against all such Individually Named Defendants and Unidentified Parties.**
- b. **The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

15. With respect to paragraph 46.1 of the Claim, particulars of the rules of the school and church operated by Mile Two, and their effective dates.

**Reply:**

**The Plaintiffs reply as follows:**

**The rules referenced at paragraph 46.1 of the Second Amended Statement of Claim include those rules furthering the principles referenced throughout the Second Amended Statement of Claim, including without limitation paragraph 41, which include but are not limited to:**

- 1. The systematic oppression, intimidation, and abuse of children;**
- 2. The requirement of unquestioning obedience and compliance by children through intimidation, coercion, isolation, fear, and threat of physical abuse;**
- 3. Total control of students' lives both inside and outside of the School and Church setting;**
- 4. The use of corporal punishment on children for all manner of conduct, including trifling and trivial conduct;**
- 5. The vilification and detestation of the LGBTQ+ community;**
- 6. Complete isolationism and condemnation of anything not considered a part of or approved by the Church and its leadership;**
- 7. The vilification and detestation of anyone that is not a member of the Church and/or School;**
- 8. The breaking up of families where a member of the family was not wholly subservient to the Church;**
- 9. Promotion of a distrust and opposition to post-secondary education and authority outside of that offered by the Church and/or School;**
- 10. The promotion of isolationist ideology and practice, including the cover-up of alleged tortious, illegal and other wrongful acts by members of the Church and/or School such as sexual abuse;**

- 11. Such further and other promulgated principles as are currently unknown, but may be discovered during the course of this litigation; and**
- 12. That the above promulgated principles are God's will.**

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).**

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff's case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

16. With respect to paragraph 46.1 of the Claim, particulars of the allegation that the school and church operated by Mile Two demanded and required compliance to its rules, including how such compliance was demanded and required.

**Reply:**

**The Plaintiffs reply as follows:**

**The Plaintiffs state that the Second Amended Statement of Claim speaks for itself.**

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).**

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

17. With respect to paragraph 46.1 of the Claim, particulars of the violence allegedly inflicted, including the:

- a. Nature of the alleged violence;
- b. Identities of the perpetrators of the alleged violence; and
- c. Dates or approximate dates on which such alleged violence occurred.

**Reply:**

**The Plaintiffs reply as follows:**

**The violence allegedly inflicted occurred during the period from 1982 to present. The Plaintiffs state the Second Amended Statement of Claim speaks for itself.**

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

18. With respect to paragraph 47(a)(i)(1) of the Claim, particulars of the identity or identities of the perpetrator(s) who allegedly struck Caitlin Erickson with a wooden paddle.

**Reply:**

**The Plaintiffs reply as follows:**

**The individual who struck Caitlin Erickson with a wooden paddle was John Olubobokun.**

19. With respect to paragraph 47(a)(i)(2) of the Claim, particulars of the date or approximate date on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

**The incident occurred in or about the 2003/2004 school year.**

20. With respect to paragraph 47(a)(i)(3) of the Claim, particulars of the alleged instances of paddling, including the:

- a. Dates or approximate dates on which such alleged paddling occurred; and
- b. Identity or identities of the perpetrator(s) of the alleged paddling.

**Reply:**

**The Plaintiffs reply as follows:**

- a. The paddling occurred in the 2004/2005 school year.**
- b. The paddling was administered by John Olubobokun.**

21. With respect to paragraph 47(b)(i)(1), (2), (3), and (3.1) of the Claim, particulars of the dates or approximate dates on which the alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

**The battery described in paragraph 47(b)(i)(1) occurred in or about 1998 or 1999.**

**The battery described in paragraph 47(b)(i)(2) occurred in or about 2003 or 2004.**

**The battery described in paragraph 47(b)(i)(3) occurred in or about 2003 or 2004.**

**The battery described in paragraph 47(b)(i)(3.1) occurred in or about 2003.**

22. With respect to paragraph 47(b)(i)(4) of the Claim, particulars of the alleged instances of paddling, including the:

- a. Dates or approximate dates on which such alleged paddling occurred;
- b. Frequency of the alleged paddling; and
- c. Identity or identities of the alleged perpetrator(s).

**Reply:**

**The Plaintiffs reply as follows:**



- a. **The paddling occurred throughout the period that Coy Nolin attended the church and school operated by Mile Two (and its predecessor), being approximately 1997 through 2004.**
- b. **The paddling occurred with such frequency that Coy Nolin is unable to recall all incidents where he was paddled.**
- c. **Paddling was administered by the Individually Named Defendants and Unidentified Defendants.**

**In any event, the Plaintiffs state:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

23. With respect to paragraph 47(b)(ii) of the Claim, particulars of the alleged physical contact, including the:
- a. Nature of the alleged contact; and
  - b. Date or approximate date on which such alleged contact occurred.

**Reply:**

**The Plaintiffs reply as follows:**

- a. The purported exorcism consisted of, among other things:**
  - a. John Olubobokun paddling Coy Nolin; and**
  - b. Approximately one hour of:**
    - i. Speaking in tongues;**
    - ii. Laying hands on Coy Nolin; and**
    - iii. Praying and commanding “gay demons” to leave Coy Nolin.**
- b. The purported exorcism occurred in the 2003/2004 school year.**

24. With respect to paragraph 47(b.1)(i) of the Claim, particulars of the alleged inappropriate personal and intimate relationship and sexual touching, including the:

- a. Nature of the alleged conduct;
- b. Frequency of the alleged conduct; and
- c. Dates or approximate dates on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

25. With respect to paragraph 47(b.2)(i) of the Claim, particulars of the identity or identities of the perpetrator(s) who allegedly struck Stefanie Hutchinson with a wooden paddle.

**Reply:**

**The Plaintiffs reply as follows:**

**In relation to the battery described at paragraph 47(b.2)(i) of the Second Amended Statement of Claim, Stefanie Hutchinson was battered by John Olubobokun.**

26. With respect to paragraph 47(b.2)(ii) of the Claim, particulars of the alleged instances of paddling, including the:

- a. Frequency of the alleged conduct;
- b. Dates or approximate dates on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

**Paragraph 47(b.2)(ii) speaks for itself, sufficiently identifying the frequency and time of such battery for Mile Two to plead intelligently.**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

27. With respect to paragraph 47(b.2)(iii) of the Claim, particulars of the alleged sexual touching and fondling by Nathan Rysavy, including the:
- a. Nature of the alleged sexual touching and fondling;
  - b. Frequency of the alleged conduct; and
  - c. Dates or approximate dates on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

- a. **The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

- b. The sexual touching and fondling occurred on a daily or nearly daily basis.**
- c. The sexual touching and fondling occurred beginning in the fall of 2000 and continued until mid-October of 2001.**

28. With respect to paragraph 47(c) of the Claim, particulars of the alleged instances of physical striking by hand or wooden paddle, including the:

- a. Frequency of the alleged conduct;
- b. Identity or identities of the perpetrator(s) of the alleged conduct; and
- c. Dates or approximate dates on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

- a. The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).**

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as**

is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

- b. **The Second Amended Statement of Claim speaks for itself, identifying the perpetrators of the conduct described in paragraph 47(c) as “the Individually Named Defendants, Unidentified Church Abusers and Unidentified School Abusers”.**
- c. **The Plaintiffs state that the conduct described at paragraph 47(c) of the Second Amended Statement of Claim occurred repeatedly and consistently throughout the period from 1982 to present.**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

29. With respect to paragraph 47(d), (e), (g), (l.1), and (o) of the Claim, particulars of the allegations set out therein, including the:

- a. Identity or identities of the perpetrator(s) of the alleged conduct for each alleged victim;
- b. Identity or identities of the victim(s) of the alleged conduct; and
- c. Dates or approximate dates on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

30. With respect to paragraph 47(f) of the Claim, particulars of the allegation set out therein, including the:

- a. Identity of the victim of the alleged conduct; and
- b. Dates or approximate dates on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

31. With respect to paragraph 47(h) of the Claim, particulars of the allegation set out therein, including the:

- a. Identity or identities of the victim(s) of the alleged conduct;
- b. Nature of the alleged sexual conduct in relation to each alleged victim; and
- c. Dates or approximate dates on which such alleged conduct occurred for each alleged victim.

**Reply:**

**The Plaintiffs reply as follows:**



- a. **Jennifer Soucy (Beaudry) was the victim of the abuse described at paragraph 47(h) of the Second Amended Statement of Claim. Other victims of Aaron Benneweis may be discovered through the class process.**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

- b. **The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

- c. The abuse described at paragraph 47(h) occurred during the period of time that Aaron Benneweis attended or was an employee, agent or representative of Mile Two.**

32. With respect to paragraph 47(i) and (j) of the Claim, particulars of the allegations set out therein, including the:

- a. Identity or identities of the perpetrator(s) of the alleged sexual conduct for each alleged victim;
- b. Identity or identities of the victim(s) of the alleged sexual conduct;
- c. Nature of the alleged sexual conduct in relation to each alleged victim; and
- d. Dates or approximate dates on which such alleged conduct occurred for each alleged victim.

**Reply:**

**The Plaintiffs reply as follows:**

- a. The abusers include, but are not limited to, Aaron Benneweis, Darcy Schuster, Nathan Schultz, and Ken Schultz.**
- b. The victims are members of the Abused Student Class and Church Minors Class.**

- c. **The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

- d. **The abuse described at paragraphs 47(i) and 47(j) of the Second Amended Statement of Claim occurred during the period from 1982 to present.**

33. With respect to paragraph 47(k) of the Claim, particulars of the allegations set out therein, including the:

- a. Identity or identities of the victim(s) of the alleged conduct;
- b. Frequency of the alleged conduct for each alleged victim; and
- c. Dates or approximate dates on which such alleged conduct occurred for each alleged victim.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

34. With respect to paragraph 47(k.1) of the Claim, particulars of the allegations set out therein, including the:
- a. Identity or identities of the victim(s) of the alleged conduct; and
  - b. Dates or approximate dates on which such alleged conduct occurred for each alleged victim.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

35. With respect to paragraph 47(1) of the Claim, particulars of the allegations set out therein, including the:

- a. Identity or identities of the victim(s) of the alleged conduct;
- b. Nature of the alleged physical and/or learning disability or disabilities for each alleged victim; and
- c. Dates or approximate dates on which such alleged conduct occurred for each alleged victim.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

36. With respect to paragraph 47(m) of the Claim, particulars of the allegation set out therein, including the:

- a. Identity of the victim of the alleged conduct; and
- b. Date or approximate date on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

37. With respect to paragraph 47(n) of the Claim, particulars of the allegations set out therein, including the:

- a. Identity or identities of the victim(s) of the alleged conduct; and
- b. Dates or approximate dates on which such alleged conduct occurred for each alleged victim.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).**

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

38. With respect to paragraph 48(a)(i), (ii), (iii), (iv), (v), and (vi) of the Claim, particulars of the allegations set out therein, including the:

- a. Identity or identities of the perpetrator(s) of the alleged conduct; and
- b. Dates or approximate dates on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

39. With respect to paragraph 48(c) of the Claim, particulars of the allegation set out therein, including the:

- a. Identity or identities of the perpetrator(s) of the alleged conduct;
- b. Identity of the victim of the alleged conduct; and
- c. Date or approximate date on which such alleged conduct occurred.



**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

40. With respect to paragraph 48(d) of the Claim, particulars of the allegations set out therein, including the:

- a. Identity or identities of the perpetrator(s) of the alleged conduct for each alleged victim;
- b. Identity or identities of the victim(s) of the alleged conduct;
- c. Identification of the principles, teachings, and purported obligations referred to; and
- d. Dates or approximate dates on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

41. With respect to paragraph 48(e) of the Claim, particulars of the allegations set out therein, including the:
- a. Identity or identities of the perpetrator(s) of the alleged conduct for each alleged victim;
  - b. Identity or identities of the victim(s) of the alleged conduct;
  - c. Nature of the alleged conduct in relation to each alleged victim;
  - d. Nature of the alleged physical and/or learning disability or disabilities in relation to each alleged victim;
  - e. Identification of the performance standards referred to; and
  - f. Dates or approximate dates on which such alleged conduct occurred for each alleged victim.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

42. With respect to paragraph 48(f) of the Claim, particulars of the allegations set out therein, including the:

- a. Identity or identities of the perpetrator(s) of the alleged conduct;
- b. Nature of the alleged conduct; and
- c. Dates or approximate dates on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

43. With respect to paragraph 48(g)(i), (ii), (iii), (iv), (v), and (vi) of the Claim, particulars of the allegations set out therein, including the:
- a. Identity or identities of the perpetrator(s) of the alleged conduct for each alleged victim;
  - b. Identity or identities of the victim(s) of the alleged conduct;
  - c. Nature of the alleged conduct for each alleged victim; and
  - d. Dates or approximate dates on which such alleged conduct occurred for each alleged victim.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

44. With respect to paragraph 48(h), (i), (j), (l), (m), (m.1), (m.2), (m.3), (m.4), (m.5), (m.8), and (m.9) of the Claim, particulars of the allegations set out therein, including the:
- a. Identity or identities of the perpetrator(s) of the alleged conduct for each alleged victim;
  - b. Identity or identities of the victim(s) of the alleged conduct; and
  - c. Dates or approximate dates on which such alleged conduct occurred for each alleged victim.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

45. With respect to paragraph 48(k) of the Claim, particulars of the allegations set out therein, including the:

- a. Identity or identities of the perpetrator(s) of the alleged conduct for each alleged victim;
- b. Identity or identities of the victim(s) of the alleged conduct;
- c. Nature of the alleged learning disabilities for each alleged victim; and
- d. Dates or approximate dates on which such alleged conduct occurred for each alleged victim.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

46. With respect to paragraph 48(m.6) of the Claim, particulars of the allegations set out therein, including the:
- a. Identity or identities of the perpetrator(s) of the alleged conduct for each alleged victim;
  - b. Identity or identities of the victim(s) of the alleged conduct;
  - c. Nature of the alleged conduct for each alleged victim; and
  - d. Dates or approximate dates on which such alleged conduct occurred for each alleged victim.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

47. With respect to paragraph 48(m.7) of the Claim, particulars of the allegations set out therein, including the:

- a. Identity or identities of the perpetrator(s) of the alleged conduct;
- b. Identity of the victim of the alleged conduct;
- c. Location(s) in which the alleged conduct occurred; and
- d. Dates or approximate dates on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).



**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

48. With respect to paragraph 48(m.10) of the Claim, particulars of the allegations set out therein, including the:

- a. Identity or identities of the victim(s) of the alleged conduct; and
- b. Dates or approximate dates on which such alleged conduct occurred for each alleged victim.

**Reply:**

**The Plaintiffs reply as follows:**

**The Plaintiffs State that the conduct of Donauer as pled at paragraph 48(m.10) of the Second Amended Statement of Claim occurred on or about February 11, 2001 in the presence of a number of minors, including Stefanie Hutchinson, the identities of which are not presently known to the Plaintiffs.**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).**

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

49. With respect to paragraph 49(a)(i) and (iii) of the Claim, particulars of the allegations set out therein, including the dates or approximate dates on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

- a. With respect to paragraph 49(a)(i) of the Second Amended Statement of Claim:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).**

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

- b. **With respect to paragraph 49(a)(iii) of the Second Amended Statement of Claim, the Plaintiffs state that the paddles were sold and kept in plain view throughout the period that Caitlin Erickson attended at Mile Two, either as a student or as a minor congregant or adherent of the Church, from 1992 to 2005. More generally, the Plaintiffs state that paddles were sold and kept in plain view throughout the period from 1982 to present.**

50. With respect to paragraph 49(a)(ii) of the Claim, particulars of the allegations set out therein, including the:

- a. Identity or identities of the perpetrator(s) of the alleged conduct; and
- b. Dates or approximate dates on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

**With respect to paragraph 49(a)(ii) of the Second Amended Statement of Claim:**

- a. **With respect to paragraph 49(a)(i) of the Second Amended Statement of Claim:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).**

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s**

**case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

- b. The conduct occurred throughout the period that Caitlin Erickson attended at Mile Two, either as a student or as a minor congregant or adherent of the Church, from 1992 to 2005.**

51. With respect to paragraph 49(a.1) of the Claim, particulars of the allegations set out therein, including the:

- a. Identity or identities of the individuals who discouraged Jennifer Soucy (Beaudry) from reporting the alleged abuse to police, discouraged her from pursuing criminal charges, and coerced her into lying to police;
- b. Nature of the coercion alleged against each alleged perpetrator; and
- c. Dates or approximate dates on which such alleged conduct occurred by each alleged perpetrator.

**Reply:**

**The Plaintiffs reply as follows:**

- a. The Second Amended Statement of Claim speaks for itself.**
- b. The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).**

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court***

*Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

- c. The conduct occurred during and after the period in which Aaron Benneweis engaged in an inappropriate personal relationship and sexual touching of Jennifer Soucy (Beaudry).**

52. With respect to paragraph 49(a.2) of the Claim, particulars of the dates or approximate dates on which such alleged conduct occurred.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman*

*v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

53. With respect to paragraph 49(b), (c), (e), (f), (h), (i), U), (I), (n), (o), (p), and (q) of the Claim, particulars of the allegations set out therein, including the:

- a. Identity or identities of the perpetrator(s) of the alleged conduct for each alleged victim;
- b. Identity or identities of the victim(s) of the alleged conduct; and
- c. Dates or approximate dates on which such alleged conduct occurred for each alleged victim.

**Reply:**

**The Plaintiffs reply as follows:**

- a. **The perpetrators of the alleged conduct are the Individually Named Defendants, Unidentified School Abusers, and Unidentified Church Abusers.**
- b. **The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see:

*Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

**c. The alleged conduct occurred throughout the period from 1982 to present.**

54. With respect to paragraph 49(d), (g), and (m) of the Claim, particulars of the allegations set out therein, including the:

- a. Identity or identities of the perpetrator(s) of the alleged conduct for each alleged victim;
- b. Identity or identities of the victim(s) of the alleged conduct;
- c. Identification of the principles, teachings, and purported obligations referred to for each alleged victim; and
- d. Dates or approximate dates on which such alleged conduct occurred for each alleged victim.

**Reply:**

**The Plaintiffs reply as follows:**

- a. **The perpetrators of the alleged conduct are the Individually Named Defendants, Unidentified School Abusers, and Unidentified Church Abusers.**
- b. **The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

- c. The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).**

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

- d. The alleged conduct occurred against numerous victims from 1982 to present.**

55. With respect to paragraph 49(k) of the Claim, particulars of the allegations set out therein, including the:

- a. Identity or identities of the perpetrator(s) of the alleged conduct for each alleged victim;
- b. Identity or identities of the victim(s) of the alleged conduct;
- c. Nature of the information alleged to have been deemed secret for each alleged victim; and



- d. Dates or approximate dates on which such alleged conduct occurred for each alleged victim.

**Reply:**

**The Plaintiffs reply as follows:**

- a. **The perpetrators of the alleged conduct are the Individually Named Defendants, Unidentified School Abusers, and Unidentified Church Abusers.**
- b. **The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

- c. **The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

**d. The alleged conduct occurred against numerous victims from 1982 to present.**

56. With respect to paragraph 54(a) and (b) of the Claim, particulars of the nature of the pain and suffering alleged to have been sustained.

**Reply:**

**The Plaintiffs reply as follows:**

**The Plaintiffs state that the Second Amended Statement of Claim speaks for itself.**

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

57. With respect to paragraph 54(t) of the Claim, particulars of the allegations set out therein, including the:

- a. Nature of the psychological, psychiatric, medical, and spiritual treatment alleged to have been required in relation to each alleged victim; and
- b. Nature of the illnesses and other disorders alleged to have been sustained in relation to each alleged victim.

**Reply:**

**The Plaintiffs reply as follows:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).**

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman***

*v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

58. With respect to paragraph 60 of the Claim, particulars of conspiracy alleged to have been participated in by the Defendants, including the:

- a. Nature of the conspiracy alleged;
- b. The identities of all parties to the alleged conspiracy; and
- c. Nature of the lawful and unlawful means alleged to have been employed to advance the alleged conspiracy.

**Reply:**

**The Plaintiffs reply as follows:**

**The Defendants conspired, by lawful and unlawful means described throughout the Second Amended Statement of Claim, to injure members of the Plaintiff Classes, including the Plaintiffs, by communicating or receiving communication furthering, directed and aimed at carrying out the principles referenced throughout the Second Amended Statement of Claim, including without limitation at paragraph 41, which principles include but are not limited to:**

- 1. The systematic oppression, intimidation, and abuse of children;**
- 2. The requirement of unquestioning obedience and compliance by children through intimidation, coercion, isolation, fear, and threat of physical abuse;**
- 3. Total control of students' lives both inside and outside of the School and Church setting;**
- 4. The use of corporal punishment on children for all manner of conduct, including trifling and trivial conduct;**
- 5. The vilification and detestation of the LGBTQ+ community;**
- 6. Complete isolationism and condemnation of anything not considered a part of or approved by the Church and its leadership;**

7. The vilification and detestation of anyone that is not a member of the Church and/or School;
8. The breaking up of families where a member of the family was not wholly subservient to the Church;
9. Promotion of a distrust and opposition to post-secondary education and authority outside of that offered by the Church and/or School;
10. The promotion of isolationist ideology and practice, including the cover-up of alleged tortious, illegal and other wrongful acts by members of the Church and/or School such as sexual abuse;
11. Such further and other promulgated principles as are currently unknown, but may be discovered during the course of this litigation; and
12. That the above promulgated principles are God's will.

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff's case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

59. With respect to paragraph 61 of the Claim, particulars of the identification of the policies and procedures referred to and their effective dates.

**Reply:**

**The Plaintiffs reply as follows:**

**The policies and procedures referenced at paragraph 61 of the Second Amended Statement of Claim are those policies and procedures enacted and utilized in furtherance of the principles referred to throughout the Second Amended Statement of Claim, including without limitation at paragraphs 41, which include but are not limited to:**

- 1. The systematic oppression, intimidation, and abuse of children;**
- 2. The requirement of unquestioning obedience and compliance by children through intimidation, coercion, isolation, fear, and threat of physical abuse;**
- 3. Total control of students' lives both inside and outside of the School and Church setting;**
- 4. The use of corporal punishment on children for all manner of conduct, including trifling and trivial conduct;**
- 5. The vilification and detestation of the LGBTQ+ community;**
- 6. Complete isolationism and condemnation of anything not considered a part of or approved by the Church and its leadership;**
- 7. The vilification and detestation of anyone that is not a member of the Church and/or School;**
- 8. The breaking up of families where a member of the family was not wholly subservient to the Church;**
- 9. Promotion of a distrust and opposition to post-secondary education and authority outside of that offered by the Church and/or School;**
- 10. The promotion of isolationist ideology and practice, including the cover-up of alleged tortious, illegal and other wrongful acts by members of the Church and/or School such as sexual abuse;**

- 11. Such further and other promulgated principles as are currently unknown, but may be discovered during the course of this litigation; and**
- 12. That the above promulgated principles are God's will.**

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).**

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff's case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

60. With respect to paragraph 63 of the Claim, particulars of the conditions referred to therein, including the nature of the conditions that are alleged to have been created, and when they were created.

**Reply:**

**The Plaintiffs reply as follows:**

**The Second Amended Statement of Claim speaks for itself in that the conduct of Mile Two, and its directors and officers, as pled herein created the said conditions**

**throughout the period of 1982 to present. With respect to the applicable date that such conditions were created:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

61. With respect to paragraph 63 of the Claim, particulars concerning the allegation that Mile Two, its directors and officers, including the Unidentified Corporate Officers and Unidentified Elders (as those terms are defined in the Claim) failed to adequately supervise employees, agents, and representatives, including the:

- a. Identity or identities of the individual(s) alleged to have failed to supervise employees, agents, and representatives;
- b. Nature of the alleged failure(s) to supervise, by each individual who is alleged to have failed to supervise employees, agents, and representatives;



- c. Dates or approximate dates on which the alleged failure(s) to supervise occurred for each individual who is alleged to have failed to supervise employees, agents, and representatives.

**Reply:**

**The Plaintiffs reply as follows:**

- a. **The Second Amended Statement of Claim speaks for itself in that the allegation is that Mile Two, its directors and officers, including the Unidentified Corporate Officers and Unidentified Elders are alleged to have failed to supervise employees, agents and representatives of Mile Two.**
- b. **Mile Two had a duty of care to the Plaintiff Classes, including the Plaintiffs, to supervise the employees, agents and representatives carrying on the activities of Mile Two, and to ensure that the Plaintiff Classes, including the Plaintiffs, were safe in activities undertaken by the School and Church. Mile Two failed to meet the standard of care, through the conduct of itself and its employees, agents and representatives, resulting in harm to the Plaintiff Classes, including the Plaintiffs, as pled.**

**The directors and officers of Mile Two had a duty to ensure that Mile Two complied with the duty of care owed to the Plaintiff Classes, including the Plaintiffs. The directors and officers failed to meet the standard of care owed to the Plaintiff Classes, including the Plaintiffs, by failing to supervise and oversee the activities of Mile Two and its employees, agents and representatives, as pled.**

- c. **The alleged failure(s) to supervise occurred throughout the period from 1982 to present for which the individual who failed to supervise was a director or officer of Mile Two, and with respect to Mile Two itself the alleged failure to supervise occurred throughout the period from 1982 to present.**

- 62. With respect to paragraph 64 of the Claim, particulars of the allegation that the alleged abuses were carried out by employees, agents, and representatives of Mile Two on the

direction of and with the knowledge and approval of the directors and officers of Mile Two, including the:

- a. Identity or identities of the individual(s) alleged to have directed employees, agents, and representatives of Mile Two to carry out the alleged abuse;
- b. Identity or identities of the individual(s) alleged to have had knowledge of the alleged abuse perpetrated by employees, agents, and representatives of Mile Two;
- c. Identity or identities of the individual(s) alleged to have approved the alleged abuse perpetrated by employees, agents, and representatives of Mile Two; and
- d. Dates or approximate dates on which the employees, agents, and representatives of Mile Two are alleged to have been directed or given approval to perpetuate the alleged abuse for each individual who is alleged to have directed or approved the alleged abuse.

**Reply:**

**The Plaintiffs reply as follows:**

- a. **The Plaintiffs state that the conduct described in the Second Amended Statement of Claim was explicitly endorsed, promoted and approved by all of the Principal Defendants, Unidentified Corporate Officers, Unidentified Church Elders, Unidentified School Abuse Planners and Unidentified Church Abuse Planners, or was implicitly endorsed, promoted and approved by each and every one of them through the conduct described therein.**
- b. **The Plaintiffs state that all directors and officers knew of, or were willfully blind to, or were reckless as to risk of and existence of the abuses pled in the Second Amended Statement of Claim.**
- c. **The Plaintiffs state that all directors and officers approved, and approved of, the abuse perpetrated by employees, agents and representatives of Mile Two.**
- d. **The direction and approval to perpetuate abuse occurred throughout the period from 1982 to present.**

**In addition:**

**The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).**

**Mile Two has better knowledge of the particulars demanded by it (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).**

**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).**

63. With respect to paragraph 76.2 of the Second Amended Claim, particulars concerning the conspiracy allegedly participated in by the Defendants, including the:
- a. Nature of the conspiracy alleged;
  - b. The identities of all parties to the alleged conspiracy; and
  - c. Nature of the means alleged to have been employed to advance the alleged conspiracy.

**Reply:**

**The Defendants conspired, by lawful and unlawful means described throughout the Second Amended Statement of Claim, to injure members of the Plaintiff Classes, including the Plaintiffs, by communicating or receiving communication furthering, directed and aimed at carrying out the principles referenced**

throughout the Second Amended Statement of Claim, including without limitation at paragraph 41, which principles include but are not limited to:

1. The systematic oppression, intimidation, and abuse of children;
2. The requirement of unquestioning obedience and compliance by children through intimidation, coercion, isolation, fear, and threat of physical abuse;
3. Total control of students' lives both inside and outside of the School and Church setting;
4. The use of corporal punishment on children for all manner of conduct, including trifling and trivial conduct;
5. The vilification and detestation of the LGBTQ+ community;
6. Complete isolationism and condemnation of anything not considered a part of or approved by the Church and its leadership;
7. The vilification and detestation of anyone that is not a member of the Church and/or School;
8. The breaking up of families where a member of the family was not wholly subservient to the Church;
9. Promotion of a distrust and opposition to post-secondary education and authority outside of that offered by the Church and/or School;
10. The promotion of isolationist ideology and practice, including the cover-up of alleged tortious, illegal and other wrongful acts by members of the Church and/or School such as sexual abuse;
11. Such further and other promulgated principles as are currently unknown, but may be discovered during the course of this litigation; and
12. That the above promulgated principles are God's will.

**In addition:**

The particulars requested herein are matters of evidence not pleading and are discoverable through a Questioning in this matter (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110).

**Mile Two has better knowledge of the particulars demanded by it** (see: *Prince Albert Co-Operative Assn. Ltd. v. Lyons*, [1984] S.J. No. 110 and *Canadian Imperial Bank of Commerce v. Todd*, [1987] S.J. No. 703).

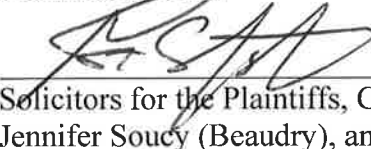
**The particulars demanded are not reasonably required by Mile Two in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).

**The Statement of Claim affords Mile Two sufficient information to enable it to understand “at least in broad strokes what the plaintiff’s case is about”, as is required in a pre-certification application for further particulars** (see: *Wasserman v Saskatchewan (Minister of Highways and Infrastructure)*, 2022 SKQB 17, [2022] SJ No 34).

DATED at the City of Saskatoon, in the Province of Saskatchewan, this 28<sup>th</sup> day of December, 2023.

**SCHARFSTEIN LLP**

Per:



Solicitors for the Plaintiffs, Caitlin Erickson,  
Jennifer Soucy (Beaudry), and Stefanie Hutchinson

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