

COURT FILE NUMBER QBG-SA-00766-2022

COURT OF KING'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE SASKATOON

PLAINTIFFS CAITLIN ERICKSON, JENNIFER SOUCY  
(BEAUDRY) and STEFANIE HUTCHINSON and  
COY-NOLIN

DEFENDANTS KEITH JOHNSON, JOHN OLUBOBOKUN, KEN  
SCHULTZ, NATHAN RYSAVY, DUFF FRIESEN,  
LYNETTE WEILER, JOEL HALL, FRAN  
THEVENOT, LOU BRUNELLE, JAMES RANDALL,  
~~TRACEY JOHNSON, SIMBO OLUBOBOKUN,~~  
ELAINE SCHULTZ, ~~CATHERINE RANDALL,~~ KEVIN  
MACMILLAN, ~~ANNE MACMILLAN,~~ DAWN  
BEAUDRY, NATHAN SCHULTZ, AARON  
BENNEWEIS, ~~DEIRDRE BENNEWEIS,~~  
~~STEPHANIE CASE,~~ 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*

**AFFIDAVIT OF RANDY DONAUER**

I, **RANDY DONAUER**, of the City of Saskatoon, in the Province of Saskatchewan, MAKE  
OATH AND SAY AS FOLLOWS THAT

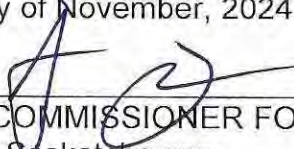
1. I am a Defendant in the within action, and as such, have personal knowledge of the  
matters and facts herein deposed to, except where stated to be on information and  
belief, and where so stated, I verily believe the same to be true.

**Receipt of Discontinuances of Claim and Settlement Agreements**

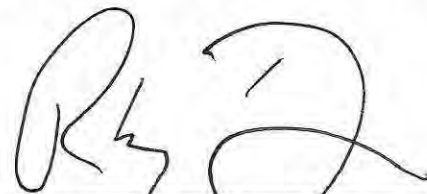
2. I am advised by my solicitors, W Law LLP, and do verily believe the same to be true  
that:

- a. On April 8, 2024, my solicitors received an email from Chelsey Kuspira, assistant to counsel for the Plaintiffs, attaching copies of the Settlement Agreements for the Defendants, Stephanie Case, Fran Thevenot, and Tracey Johnston. Attached hereto and marked as Exhibit "A" is a true copy of the email received from Chelsey Kuspira on April 8, 2024. To date, my solicitors have not been provided with copies of the Discontinuances of Claim on behalf of the Defendants, Stephanie Case, Fran Thevenot, and Tracey Johnston.
  
- b. On April 29, 2024, my solicitors received an email from Chelsey Kuspira, assistant to counsel for the Plaintiffs, attaching the Discontinuances of Claim on behalf of the Defendants Anne MacMillan, Catherine Randall, Deidre Benneweis, and Simbo Olubobokun. Attached and marked hereto as Exhibit "B" is a true copy of the email received from Chelsey Kuspira on April 29, 2024.
  
3. I make this affidavit in support of the application for an order to stay this action and for no improper or other purpose.

SWORN BEFORE ME,  
 at Saskatoon, Saskatchewan, this 22<sup>nd</sup>  
 day of November, 2024

  
 \_\_\_\_\_  
 A COMMISSIONER FOR OATHS  
 for Saskatchewan  
 Being a Lawyer

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)  
)  
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)

  
 \_\_\_\_\_  
 RANDY DONAUER

**CONTACT INFORMATION AND ADDRESS FOR SERVICE**

Name of firm:	W Law LLP
Lawyers in charge of file:	Adam Touet
Address of legal firm:	1100, 122 1 <sup>st</sup> Ave. S., Saskatoon SK S7K 7E5
Telephone number:	(306) 244-2242
Fax number:	(306) 652-0332
Email address:	atouet@wlaw.com

**From:** Chelsey Kuspira  
**To:** gkuski@mcdougallgauley.com; aquayle@mcdougallgauley.com  
**Cc:** dtangjerd@wardellaw.ca; Mark Vanstone; cpanko@commonsenselawyer.com; brent@littlelaw.ca; Spencer, Scott; Jennifer Pereira; jared.biden@gov.sk.ca; justin.stevenson@gov.sk.ca; Adam Touet; jehmann@kanuka.ca; Jay Watson; Jared D. Epp; parleelaw@sasktel.net; Grant Scharfstein; Samuel Edmondson; Michael Scharfstein; Christine Libner  
**Subject:** Erickson et al v Mile Two Church et al  
**Date:** April 8, 2024 1:55:02 PM  
**Attachments:** 2024-02-24 Settlement Agreement - fully executed.pdf  
2023-11-01 Settlement Agreement - fully executed.pdf  
2024-02 Settlement Agreement - fully executed.pdf

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Gord,

Attached are the three Settlement Agreements with Stephanie Case, Fran Thevenot and Tracey Johnson.

Thanks,

**Chelsey Kuspira**

Assistant to Grant J. Scharfstein, K.C., Samuel W. Edmondson and Valerie J. Warwick  
email: ckuspira@scharfsteinlaw.com



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This is Exhibit " A " referred to in the  
Affidavit of Randy Donauer  
Sworn before me this 22<sup>nd</sup> day of  
November, 2024

A. J.  
A Commissioner for Oaths for Saskatchewan  
~~My Appointment Expires~~  
- OR - Being a Solicitor

**From:** Chelsey Kuspira  
**To:** dtangjerd@wardellaw.ca; Mark Vanstone; Spencer, Scott; Jared D. Epp  
**Cc:** Grant Scharfstein; Samuel Edmondson; Michael Scharfstein; Christine Libner; cpanko@commonsenselawyer.com; brent@littlelaw.ca; gkuski@mcDougallgauley.com; aquayle@mcDougallgauley.com; Jennifer Pereira; jared.biden@gov.sk.ca; justin.stevenson@gov.sk.ca; Adam Touet; jehmann@kanuka.ca; Jay Watson; parleelaw@sasktel.net  
**Subject:** Erickson et al v Johnson et al  
**Date:** April 29, 2024 3:11:45 PM  
**Attachments:** 2024-04-25 Discontinuance of Claim (Anne MacMillan).pdf  
2024-04-26 Discontinuance of Claim (Catherine Randall).pdf  
2024-04-26 Discontinuance of Claim (Deidre Benneweis).pdf  
2024-04-29 Discontinuance of Claim (Simbo Olubobokun).pdf

Good afternoon,

Attached are Discontinuances of Claim filed in this matter.

Thanks,

**Chelsey Kuspira**

Assistant to Grant J. Scharfstein, K.C., Samuel W. Edmondson and Valerie J. Warwick  
email: ckuspira@scharfsteinlaw.com



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This is Exhibit " B " referred to in the  
Affidavit of Randy Donauer  
Sworn before me this 22<sup>nd</sup> day of  
November, 2024  
[Signature]  
A Commissioner for Oaths for Saskatchewan  
My Appointment Expires \_\_\_\_\_  
- OR - Being a Solicitor