

COURT FILE NUMBER QBG-SA-00766-2022

COURT OF KING'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE SASKATOON

PLAINTIFFS CAITLIN ERICKSON and COY NOLIN

DEFENDANTS KEITH JOHNSON, JOHN OLUBOBOKUN, KEN SCHULTZ, NATHAN RYSAVY, DUFF FRIESEN, LYNETTE ~~WHEELER~~ WEILER, JOEL HALL, FRAN THEVENOT, LOU BRUNELLE, JAMES RANDALL, TRACEY JOHNSON, SIMBO OLUBOBOKUN, ELAINE SCHULTZ, CATHERINE RANDALL, KEVIN MACMILLAN, ANNE MACMILLAN, DAWN BEAUDRY, NATHAN SCHULTZ, AARON BENNEWEIS, DEIDRE BENNEWEIS, STEPHANIE CASE, DARCY SCHUSTER, RANDY DONAUER, JOHN THURINGER, MILE TWO CHURCH INC., THE GOVERNMENT OF SASKATCHEWAN, JOHN DOES and JANE DOES

Brought under *The Class Actions Act*, SS 2001 c C-12.01

REPLY TO REQUEST FOR PARTICULARS

The Plaintiffs, Caitlin Erickson and Coy Nolin, hereby reply as follows to the Defendant's, Tracey Johnson's, Request for Particulars, dated March 28, 2023:

1. With respect to paragraph 31(a) of the Amended Claim, particulars of any incidence of alleged negligence as it relates to the Defendant, Tracey Johnson, including particulars of any alleged breach of any duty of care, and particulars as to any alleged harm caused by the Defendant, Tracey Johnson, and whether the Plaintiffs claim in negligence against the Defendant, Tracey Johnson, for any damages allegedly attributable to any other defendant, and if so, to what degree.

Reply:

The Plaintiffs reply as follows:

The Statement of Claim speaks for itself and outlines the particulars requested herein. Tracey Johnson is included in the definition of “Individually Named Defendants” in paragraph 29 of the Amended Statement of Claim, and in the definition of "Defendants” in paragraph 30 of the Amended Statement of Claim.

In addition:

- 1. 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).
 - 2. Mrs. Johnson has better knowledge of the particulars demanded by her** (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).
 - 3. The particulars demanded are not reasonably required by Mrs. Johnson in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).
 - 4. The Statement of Claim affords Mrs. Johnson sufficient information to enable her 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).
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2. With respect to paragraph 31(a) of the Amended Claim, particulars of any incidence of alleged gross negligence as it relates to the Defendant, Tracey Johnson, including particulars of any alleged breach of any duty of care, alleged intent to do harm, or wanton or reckless conduct, and particulars as to any alleged harm caused by the Defendant, Tracey Johnson, and whether the Plaintiffs claim in gross negligence against the Defendant,

Tracey Johnson, for any damages allegedly attributable to any other Defendant, and if so, to what degree.

Reply:

The Plaintiffs reply as follows:

The Statement of Claim speaks for itself and outlines the particulars requested herein. Tracey Johnson is included in the definition of “Individually Named Defendants” in paragraph 29 of the Amended Statement of Claim, and in the definition of “Defendants” in paragraph 30 of the Amended Statement of Claim.

In addition:

- 1. 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).**
 - 2. Mrs. Johnson has better knowledge of the particulars demanded by her (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).**
 - 3. The particulars demanded are not reasonably required by Mrs. Johnson in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**
 - 4. The Statement of Claim affords Mrs. Johnson sufficient information to enable her 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 31(a) of the Amended Claim, particulars of any incidence of alleged assault and/or battery as it relates to the Defendant, Tracey Johnson.

Reply:

The Plaintiffs reply as follows:

The Statement of Claim speaks for itself and outlines the particulars requested herein. Tracey Johnson is included in the definition of “Individually Named Defendants” in paragraph 29 of the Amended Statement of Claim, and in the definition of "Defendants” in paragraph 30 of the Amended Statement of Claim.

In addition:

- 1. 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).**
 - 2. Mrs. Johnson has better knowledge of the particulars demanded by her (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).**
 - 3. The particulars demanded are not reasonably required by Mrs. Johnson in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**
 - 4. The Statement of Claim affords Mrs. Johnson sufficient information to enable her 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 31(a) of the Amended Claim, particulars of any incidence of alleged infliction of mental suffering as it relates to the Defendant, Tracey Johnson.

Reply:

The Plaintiffs reply as follows:

The Statement of Claim speaks for itself and outlines the particulars requested herein. Tracey Johnson is included in the definition of “Individually Named Defendants” in paragraph 29 of the Amended Statement of Claim, and in the definition of "Defendants” in paragraph 30 of the Amended Statement of Claim.

In addition:

- 1. 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).**
- 2. Mrs. Johnson has better knowledge of the particulars demanded by her (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).**
- 3. The particulars demanded are not reasonably required by Mrs. Johnson in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**
- 4. The Statement of Claim affords Mrs. Johnson sufficient information to enable her 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 31(a) of the Amended Claim, particulars of any alleged conspiracy involving the Defendant, Tracey Johnson, including particulars of whom she allegedly conspired with, the particulars and facts relied upon in alleging that the Defendant, Tracey Johnson intended to cause injury to the Plaintiffs, and as to whether it is pleaded that any alleged conduct by the alleged conspirators was lawful or unlawful.

Reply:

The Plaintiffs reply as follows:

The Statement of Claim speaks for itself and outlines the particulars requested herein. Tracey Johnson is included in the definition of “Individually Named Defendants” in paragraph 29 of the Amended Statement of Claim, and in the definition of "Defendants” in paragraph 30 of the Amended Statement of Claim.

In addition:

- 1. 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).**
 - 2. Mrs. Johnson has better knowledge of the particulars demanded by her (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).**
 - 3. The particulars demanded are not reasonably required by Mrs. Johnson in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**
 - 4. The Statement of Claim affords Mrs. Johnson sufficient information to enable her 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 31(d) of the Amended Claim, particulars of any alleged incidence of conduct by the Defendant, Tracey Johnson, which the Plaintiffs claim entitle them to aggravated or punitive damages against the Defendant, Tracey Johnson.

Reply:

The Plaintiffs reply as follows:

The Statement of Claim speaks for itself and outlines the particulars requested herein. Tracey Johnson is included in the definition of “Individually Named Defendants” in paragraph 29 of the Amended Statement of Claim, and in the definition of "Defendants” in paragraph 30 of the Amended Statement of Claim.

In addition:

- 1. 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).**
 - 2. Mrs. Johnson has better knowledge of the particulars demanded by her (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).**
 - 3. The particulars demanded are not reasonably required by Mrs. Johnson in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**
 - 4. The Statement of Claim affords Mrs. Johnson sufficient information to enable her 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 31(e) of the Amended Claim, whether it is alleged that the Defendant, Tracey Johnson administered the corporal punishment of any minor, and if so particulars of the alleged incidence of the same.

Reply:

The Plaintiffs reply as follows:

The Statement of Claim speaks for itself and outlines the particulars requested herein. Tracey Johnson is included in the definition of “Individually Named Defendants” in paragraph 29 of the Amended Statement of Claim, and in the definition of "Defendants" in paragraph 30 of the Amended Statement of Claim.

In addition:

- 1. 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).**
 - 2. Mrs. Johnson has better knowledge of the particulars demanded by her (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).**
 - 3. The particulars demanded are not reasonably required by Mrs. Johnson in order to plead intelligently (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).**
 - 4. The Statement of Claim affords Mrs. Johnson sufficient information to enable her 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 32 of the Amended Claim, whether the use of the word “Defendants” relates to the Defendant, Tracey Johnson, or whether the use of the word is a misnomer, and if it is alleged that the word “Defendants” does relate to the Defendant, Tracey Johnson, particulars of any alleged incidents described in paragraphs 32(b) and/or 32(c) that allegedly relates to or involves the Defendant, Tracey Johnson.

Reply:

The Plaintiffs reply as follows:

The Statement of Claim speaks for itself and outlines the particulars requested herein. Tracey Johnson is included in the definition of “Individually Named Defendants” in paragraph 29 of the Amended Statement of Claim, and in the definition of "Defendants” in paragraph 30 of the Amended Statement of Claim.

Paragraph 32 of the Amended Statement of Claim defines the 3 Plaintiff Classes and states:

32. The Plaintiffs propose that the Plaintiff Classes be defined as follows:

a. Students who attended the School at Legacy Christian Academy, or its predecessor, between the founding of the School in or about 1982 and present, including members of the Abused Student Class (the “Attending Student Class”);

b. Students who attended the School at Legacy Christian Academy, or its predecessor, between the founding of the School in or about 1982 and present, who suffered or observed physical, sexual, psychological, emotional, mental or spiritual abuse perpetrated by the Defendants in the Defendants’ operation of the School (the “Abused Student Class”); and

c. Minors who were adherents or congregants of the Church operated by Mile Two Church Inc., or its predecessors, who suffered or observed physical, sexual, psychological, emotional, mental or spiritual harm perpetrated by the Defendants’ operation of the Church (the “Church Minors Class”).

(altogether the “Plaintiff Classes”)

For clarity, it is anticipated that paragraph 32(c) of the Amended Statement of Claim will be amended to read:

c. Minors who were adherents or congregants of the Church operated by Mile Two Church Inc., or its predecessors, who suffered or observed physical, sexual, psychological, emotional, mental or spiritual harm perpetrated by the Defendants in the Defendants’ operation of the Church (the “Church Minors Class”).

9. With respect to the Amended Claim in general, where the Plaintiffs alleged sexual and/or physical assault, particulars of the identities of the alleged perpetrators of those alleged abuses so as to allow the Defendant, Tracey Johnson, to assess the allegations, and any association she may have or not had with any alleged perpetrator.

Reply:

The Plaintiffs reply as follows:

The Statement of Claim speaks for itself and outlines the particulars requested herein. Tracey Johnson is included in the definition of “Individually Named Defendants” in paragraph 29 of the Amended Statement of Claim, and in the definition of “Defendants” in paragraph 30 of the Amended Statement of Claim.

In addition:

1. **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).
2. **Mrs. Johnson has better knowledge of the particulars demanded by her** (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).

3. **The particulars demanded are not reasonably required by Mrs. Johnson in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).
 4. **The Statement of Claim affords Mrs. Johnson sufficient information to enable her 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 the Amended Claim in general, particulars of any alleged incidence of corporal punishment, physical assault, trespass to the person, battery, and/or intentional infliction of mental injury allegedly perpetrated by the Defendant, Tracey Johnson.

Reply:

The Plaintiffs reply as follows:

The Statement of Claim speaks for itself and outlines the particulars requested herein. Tracey Johnson is included in the definition of “Individually Named Defendants” in paragraph 29 of the Amended Statement of Claim, and in the definition of “Defendants” in paragraph 30 of the Amended Statement of Claim.

In addition:

1. **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).
2. **Mrs. Johnson has better knowledge of the particulars demanded by her** (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).

3. **The particulars demanded are not reasonably required by Mrs. Johnson in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).
 4. **The Statement of Claim affords Mrs. Johnson sufficient information to enable her 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 the Amended Claim in general, particulars of any alleged incidence of corporal punishment, physical assault, trespass to the person, battery, and/or intentional infliction of mental injury allegedly observed by the Defendant, Tracey Johnson.

Reply:

The Plaintiffs reply as follows:

The Statement of Claim speaks for itself and outlines the particulars requested herein. Tracey Johnson is included in the definition of “Individually Named Defendants” in paragraph 29 of the Amended Statement of Claim, and in the definition of “Defendants” in paragraph 30 of the Amended Statement of Claim.

In addition:

1. **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).
2. **Mrs. Johnson has better knowledge of the particulars demanded by her** (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).

3. **The particulars demanded are not reasonably required by Mrs. Johnson in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).
 4. **The Statement of Claim affords Mrs. Johnson sufficient information to enable her 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 the Amended Claim in general, particulars of any incidence of alleged corporal punishment, physical assault, trespass to the person, battery, and/or intentional infliction of mental injury allegedly condoned or conspired to by the Defendant, Tracey Johnson.

Reply:

The Plaintiffs reply as follows:

The Statement of Claim speaks for itself and outlines the particulars requested herein. Tracey Johnson is included in the definition of “Individually Named Defendants” in paragraph 29 of the Amended Statement of Claim, and in the definition of “Defendants” in paragraph 30 of the Amended Statement of Claim.

In addition:

1. **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).
2. **Mrs. Johnson has better knowledge of the particulars demanded by her** (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).

- 3. The particulars demanded are not reasonably required by Mrs. Johnson in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).
 - 4. The Statement of Claim affords Mrs. Johnson sufficient information to enable her 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 the Amended Claim in general, particulars of any alleged threats by the Defendant, Tracy Johnson, of corporal punishment, physical assault, trespass to the person, battery, or to intentionally inflict mental injury, and any particulars of any alleged coercion or intimidation.

Reply:

The Plaintiffs reply as follows:

The Statement of Claim speaks for itself and outlines the particulars requested herein. Tracey Johnson is included in the definition of “Individually Named Defendants” in paragraph 29 of the Amended Statement of Claim, and in the definition of “Defendants” in paragraph 30 of the Amended Statement of Claim.

In addition:

- 1. 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).
- 2. Mrs. Johnson has better knowledge of the particulars demanded by her** (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).

3. **The particulars demanded are not reasonably required by Mrs. Johnson in order to plead intelligently** (see: *Saskatchewan Provincial Court Judges Assn. v. Saskatchewan (Minister of Justice)*, [1994] 9 W.W.R. 293).
 4. **The Statement of Claim affords Mrs. Johnson sufficient information to enable her 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 the Amended Claim in general, particulars of any alleged incidents and alleged acts complained of and allegedly carried out by others that the Defendant, Tracey Johnson, either allegedly had knowledge of, directed or approved.

Reply:

The Plaintiffs reply as follows:

The Statement of Claim speaks for itself and outlines the particulars requested herein. Tracey Johnson is included in the definition of “Individually Named Defendants” in paragraph 29 of the Amended Statement of Claim, and in the definition of “Defendants” in paragraph 30 of the Amended Statement of Claim.

In addition:

1. **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).
2. **Mrs. Johnson has better knowledge of the particulars demanded by her** (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).


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

4. **The Statement of Claim affords Mrs. Johnson sufficient information to enable her 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 2nd day of June, 2023.

SCHARFSTEIN LLP

Per: _____


Solicitors for the Plaintiffs,
Caitlin Erickson and Coy Nolin

CONTACT INFORMATION AND ADDRESS FOR SERVICE

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