

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

LAURA ROBINSON

PLAINTIFF

AND:

JOHN FURLONG,  
TWENTYTEN GROUP STRATEGIC MARKETING  
COMMUNICATIONS INC. and  
TWENTYTEN GROUP HOLDINGS INC.

DEFENDANTS

**DEMAND FOR PARTICULARS**

To: The Defendant, John Furlong.

AND TO: his solicitor

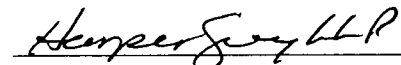
TAKE NOTICE that pursuant to Rules 3-7(20)(b), 3-7(21)(b) and 3-7(23), the plaintiff demands further and better particulars as set out herein.

1. Except where otherwise noted, otherwise noted, all paragraph references herein refer to part 3 of the defendant's response to civil claim.
2. In respect of paragraph one, provide particulars of:
  - (a) Which of the words complained of are statements of fact; and
  - (b) The facts and matters relied on in support of the allegation that the words are true.
3. In respect of paragraphs five and six, provide particulars of:
  - (a) Which of the words complained of are statements of fact; and
  - (b) Which of the words complained of are comment on matters of public interest.
4. In respect of paragraphs seven and eight, provide particulars of:
  - (a) The public importance in publishing the words complained of;

- (b) The urgency in publishing the words complained of at the time they were published, and if so, the nature of that urgency;
- (c) The sources relied on by this defendant in researching the allegations underpinning the words complained of;
- (d) The steps taken by this defendant to seek and accurately report on the plaintiff's side of the story;
- (e) The steps taken by this defendant to amend the impugned publications after being specifically advised by the plaintiff that the plaintiff was not the source of the allegations that the defendant had sexually abused former students; and
- (f) The steps taken by this defendant to amend the impugned publications after being specifically advised by the plaintiff that the plaintiff did not file a complaint with the RCMP alleging that the defendant had sexually abused former students.

AND FURTHER TAKE NOTICE that if you do not provide the above particulars within 10 days of delivery of this Demand, the plaintiff will make application to Court to compel delivery.

Dated: 24 April 2014

  
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HARPER GREY LLP  
(Per Bryan G. Baynham, Q.C.)  
Lawyer for the Plaintiff

Name and address of lawyer:  
**HARPER GREY LLP**  
Barristers & Solicitors  
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Rule 24-1(10) of the Supreme Court Civil Rules states:

Demand for amendment

- (10) A party to a transitional proceeding may, by demand in Form 122, demand that a document that is deemed under this rule to be a pleading, petition or response to petition be amended by the party who filed it to make it accord with these *Supreme Court Civil Rules*.