

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

RESPONSE TO DEMAND FOR PARTICULARS

TO: The Plaintiff, Laura Robinson

The Response of the Defendant, John Furlong, to the Demand for Particulars of the Plaintiff, Laura Robinson dated 20 May 2014 is as follows:

The particulars demanded of paragraph 1 of Part 3 of the defendant's response to civil claim are as follows:

1. Mr. Furlong made a diligent attempt to verify the truth of his statements prior to the publication of all of the statements complained of in the Notice of Civil Claim including as set out below.
2. With respect to the statement made by Mr. Furlong on September 27, 2012 (referred to in the Notice of Civil Claim as the "Press Conference Defamation"), prior to making that statement the defendant Furlong personally and/or through representatives:
 - (a) reviewed his records in order to determine if he had been directly contacted by Ms. Robinson and/or the Georgia Straight prior to publication of the September 27, 2012 article;
 - (b) reviewed his records in order to determine the nature and content of any correspondence between him and/or his representatives and Ms. Robinson and/or the Georgia Straight.
 - (c) reviewed his records in order to refresh his recollection to the written cautions that had been provided to the plaintiff Robinson by Mr. Furlong's representatives prior to publication of the September 27, 2012 article; and

- (d) discussed the attempt made by an individual to blackmail Mr. Furlong with a similar complaint prior to the 2010 Olympic Games in order to refresh Mr. Furlong's recollection.

3. With respect to the written statement published by Mr. Furlong on October 2, 2012 (referred to in the Notice of Civil Claim as the "October 2 Defamation"), prior to making that statement Mr. Furlong and/or his representatives, in addition to all actions taken previously as outlined above:

- (a) reviewed articles written by the plaintiff regarding VANOC, First Nations athletes, female athletes, Mr. Furlong and the International Olympic committee;
- (b) spoke with others who worked at VANOC about Ms. Robinson; and
- (c) spoke with his family about the circumstances of my cousin Siobhan's death.

4. With respect to the written statement published by Mr. Furlong on October 29, 2013 (referred to in the Notice of Civil Claim as the "October 29 Defamation"), prior to making that statement Mr. Furlong and/or his representatives, in addition to all actions taken previously as outlined above:

- (a) Spoke, corresponded and met with Corporal Quinton Mackie of the RCMP regarding the status of the investigation into Mr. Furlong which had been precipitated by a complaint made by Beverly Abraham;
- (b) searched and reviewed dozens of articles written by Ms. Robinson archived on the Factiva database;
- (c) obtained and reviewed publicly available court documents relating to Ms. Robinson's civil action against Keith Benson in British Columbia Provincial Court;
- (d) spoke with Keith Benson about the allegations made by Ms. Robinson against him;
- (e) spoke with Ken Shields about the allegations made by Ms. Robinson against him;
- (f) spoke with a Rod Hutton about an article written by Ms. Robinson in Chatelaine making allegations against the Vancouver Fire Department;
- (g) reviewed the agenda for an upcoming conference called Play The Game at which Ms. Robinson was scheduled to speak; and
- (h) reviewed the pleadings filed by Ms. Robinson in *Furlong v Robinson et al*, BCSC Vancouver Registry No. S128358.

5. With respect to the statements made by Mr. Furlong in an interview with Chris Gailus of Global Television on October 28, 2013 (referred to in the Notice of Civil Claim as the

“Global TV Defamation”), prior to making that statement Mr. Furlong and/or his representatives, in addition to the actions taken previously as outlined above:

- (a) spoke and corresponded with Corporal Quinton Mackie of the RCMP regarding the status of the investigation into Mr. Furlong which had been precipitated by a complaint made by Beverly Abraham.


6. With respect to the statements made by Mr. Furlong in an interview with Macleans magazine on October 29, 2013 (referred to in the Notice of Civil Claim as the “Macleans Defamation”), prior to making that statement Mr. Furlong and/or his representatives, in addition to the actions taken previously as outlined above:

- (a) spoke and corresponded with Corporal Quinton Mackie of the RCMP regarding the status of the investigation into Mr. Furlong which had been precipitated by a complaint made by Beverly Abraham.

7. With respect to the written statement made by Mr. Furlong on December 12, 2013 (referred to in the Notice of Civil Claim both as the “December 12 Defamation”), prior to making that statement Mr. Furlong and/or his representatives, in addition to the actions taken previously as outlined above:

- (a) spoke and corresponded with Corporal Quinton Mackie of the RCMP regarding the status of the investigation into Mr. Furlong which had been precipitated by a complaint made by Beverly Abraham;
- (b) searched and reviewed dozens of articles written by Ms. Robinson archived on the Factiva database;
- (c) obtained and reviewed publicly available court documents relating to Ms. Robinson’s civil action against Keith Benson in British Columbia Provincial Court; and
- (d) reviewed the pleadings filed by Ms. Robinson in *Furlong v Robinson et al*, BCSC Vancouver Registry No. S128358.

Dated: June 5, 2014.



 Signature of Claire E. Hunter
 Counsel for the Defendant

These Particulars are delivered by Hunter Litigation Chambers Law Corp, solicitors for the Defendant John Furlong, whose place of business and address for service is 2100 – 1040 West Georgia Street, Vancouver, British Columbia, V6E 4H1. Telephone: (604) 891-2400. Facsimile: (604) 647-4554 (Attn: John J.L. Hunter, Q.C./Claire E. Hunter).