

SENT VIA EMAIL TO (CultureGuard@gmail.com)

October 25, 2016

Kari D. Simpson
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Langley, BC V2Z 3B2
Tel: 604.514.1614
Email: CultureGuard@gmail.com

Chris Macleod, 647.346.6696
(Direct Line)
cmacleod@cambridgellp.com

Dear Kari Simpson:

**Re: Christopher Hudspeth et al. v. William Whatcott et al.
Court File No.: CV-16-558424-00-CP
Our File No.: 1602326**

We are in receipt of your letter dated October 18, 2016 addressed to Mr. Elliott.

Thank you for informing us that the email link to the Whatcott action is not functioning correctly. I will forward your concerns to our tech support, who will act accordingly.

Please be advised that for the purposes of this class action, and particularly, the tort of civil conspiracy, the fact that you have supported and/or funded Mr. Whatcott's activities in the past does not make you in any way a co-conspirator or a defendant in this action. Our class action only pertains to activities surrounding the Toronto Pride Parade 2016. At this time we do not have sufficient evidence to conclude that you are a suitable defendant in this proceeding.

If you provided funding to Mr. Whatcott or the Gay Zombies Cannabis Consumers Association in relation to the Toronto Pride Parade 2016, please provide evidence of such assistance so that we can determine whether to proceed with including you as a defendant in this action.

Under Ontario law, the plaintiff decides who should be included as a defendant; therefore, our clients are not obliged to include you as a defendant or serve you with any material in relation to this action.

At present, we have no evidence that you are a suitable defendant. Mr. Whatcott has refused to reveal the identities of anyone who assisted him in relation to his activities at Toronto Pride Parade 2016 and we will be addressing the issue of the identity of his co-conspirators with the court.

With respect to your allegations pertaining to Mr. Hudspeth's alleged support of the Black Eagle Kennel Klub, my client is under no obligation to produce any records pertaining to the same and will not take a position with respect to these allegations. Your claims regarding same are irrelevant to this action. I reiterate; this claim is limited to Mr. Whatcott's activities pertaining to the Toronto Pride Parade 2016 and any assistance he received in relation to the Toronto Pride Parade 2016.

Again, since you are not a party to this proceeding, we are not obliged to respond to your correspondence or demands. Any time spent in anticipation of being included as a defendant and any damages arising therefrom are incurred at your own risk and expense.

You are not obligated to respond to this letter; however, if you choose to do so, we advise that you obtain legal counsel before responding.

We trust the foregoing is satisfactory to you.

Yours very truly,

CAMBRIDGE LLP

Per:

A handwritten signature in black ink, appearing to read 'CM', is written over the 'Per:' text.

CHRIS MACLEOD

CRM/jk