#### CAMBRIDGE LLP

December 13, 2016

#### SENT VIA EMAIL TO: CultureGuard@gmail.com

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

Kari D. Simpson # 101 22678-28<sup>th</sup> Avenue Langley, BC V2Z 3B2

Dear Ms. Simpson:

Re: Christopher Hudspeth et al. v. William Whatcott et al.

Court File No.: CV-16-558424-00-CP

Our File No.: 1602326

We enclose a Notice of Cross-Examination which is hereby served upon you in accordance with the *Rules of Civil Procedure*.

Yours very truly,

**CAMBRIDGE LLP** 

**CHRIS MACLEOD** 

CRM/ns

Enclosure:

Notice of Cross-Examination

Cc

Dr. Charles Lugosi Mr. John W. Findlay Stefan Jetchick

### ONTARIO SUPERIOR COURT OF JUSTICE

BETWEEN:

CHRISTOPHER HUDSPETH and GEORGE SMITHERMAN

**Plaintiffs** 

-and-

WILLIAM WHATCOTT, JONI WHATCOTT, ADAM ZOMBIE, BRIAN ZOMBIE, CHRISTOPHER ZOMBIE, DOUGLAS ZOMBIE, STEFAN JETCHICK, FRANK ZOMBIE, XYZ CORPORATION, JANE DOES and JOHN DOES

Defendants

#### NOTICE OF EXAMINATION

TO: Kari D. Simpson

YOU ARE REQUIRED TO ATTEND, on **Thursday, December 15, 2016, at 10:00 a.m.** at the office of Charest Reporting Services, HSBC Building, 1650 -885 W. Georgia Street, Vancouver, BC V6C 3E8, Phone: 604.629.2373 for:

[X] Cross-examination on your affidavit dated November 8, 2016

YOU ARE REQUIRED TO BRING WITH YOU and produce at the examination the following documents and things:

- 1. Your Affidavit dated November 8, 2016; and
- 2. All original documents including letters and cards from the applicant, any sound recording, videotape, film, photograph, chart, graph, map, plan, survey, book of account and information recorded or stored by means on any device in your

possession, control or power which are relevant to any matters in issue in this proceeding and a list of all documents over which you claim privilege.

3. In particular, documentary evidence that you have provided funds to Bill Whatcott and his supporters for their attendance at Pride Toronto 2016 and the printing and distribution of the literature at the Pride 2016 parade in Toronto.

December 13, 2016

**CAMBRIDGE LLP** 

333 Adelaide Street West 4th Floor Toronto, Ontario M5V 1R5

R. Douglas Elliott (LSUC# 23685L)

Tel: 647.430.5378 (Direct Line) delliott@cambridgellp.com

H. Scott Fairley (LSUC# 22579A)

Tel: 647.427.3905 (Direct Line)

sfairley@cambridgellp.com

Chris Macleod (LSUC# 45723M)

Tel: 647.346.6696 (Direct Line) cmacleod@cambridgellp.com

Maniit Singh (LSUC# 55976D)

Tel: 647.430.3180 (Direct Line)

msingh@cambridgellp.com

N. Joan Kasozi (LSUC# 70332Q)

jkasozi@cambridgellp.com

Tel: 416.477.7007 Fax: 289.293.0318

Lawyers for the Plaintiffs Christopher Hudspeth and George Smitherman

To:

**Kari D. Simpson** # 101 22678-28<sup>th</sup> Avenue Langley, BC V2Z 3B2

E-mail: CultureGuard@gmail.com

## SUPERIOR COURT OF JUSTICE ONTARIO

PROCEEDING COMMENCED AT TORONTO

# NOTICE OF EXAMINATION

## CAMBRIDGE LLP

333 Adelaide Street West, 4th Floor Toronto, Ontario

M5V 1R5

R. Douglas Elliott (LSUC# 23685L) delliott@cambridgellp.com Tel: 647.430.5378

H. Scott Fairley (LSUC# 22579A)

sfairley@cambridgellp.com Tel: 647.427.3905

Chris Macleod (LSUC# 45723M)

cmacleod@cambridgellp.com Tel: 647.346.6696

Manjit Singh (LSUC# 55976D) msingh@cambridgellp.com Tel: 647.430.3180

N. Joan Kasozi (LSUC# 70332Q) jkasozi@cambridgellp.com

416.477.7007 <u>--</u>

289.293.0318 Fax:

Christopher Hudspeth and George Smitherman Lawyers for the Plaintiffs

2		