WORKING DRAFT — VERIFY THE CURRENT COURT CAPTION AND COMPLETE BRACKETED ITEMS BEFORE SIGNING OR FILING

2026 Hfx. No. 553352

SUPREME COURT OF NOVA SCOTIA

BETWEEN:
ROBERT COLIN URQUHART
Plaintiff

- and -

Todd Brisbane (Brisbin), Jon Cameron, Alan Warkentin, Christopher Smith (A), Lars Smith (A), Dr. Elise Keough, Denise Currie, Wesley Aubichon (Cameron/Warkentin), Alissa Spinny, Audry St. Denis, John Green, Marcus Wolfe, Rowan Enslow, Zachary Xavier, and Michael McMichaelson
Defendants

DEMAND FOR PARTICULARS

Form 38.08 — deliver to the named Defendant; do not file this demand

The Plaintiff, Robert Colin Urquhart, demands from [full legal name of the Defendant] a further and better statement of that Defendant's Defence, as follows:

1. State whether your filed Defence alleges or relies on a material fact that the Plaintiff committed, directed, knowingly assisted, or participated in an offence involving child sexual abuse material (described in the Criminal Code as child pornography), trafficking in persons including trafficking of a child, murder or another homicide offence, or laundering proceeds of crime. Identify each category, if any, that is alleged.

2. For each such allegation, state the material facts that concern the Plaintiff's own conduct, including what conduct is attributed to him, the approximate date or period, the location, and his alleged role.

3. For each such allegation, identify the paragraph or paragraphs of your filed Defence in which it is pleaded. If it is not pleaded but you contend it forms part of your Defence, provide a further and better statement identifying the material facts you rely on.

4. If your Defence makes no such allegation and you do not rely on one as a material fact in your Defence, state that clearly.

This demand seeks only particulars of material facts that could be included in a pleading. It does not demand evidence, a description of evidence, privileged communications, private litigation strategy, police or medical records, or information about an unrelated investigation.

Signature

Signed at _____, Nova Scotia, on _____, 2026.

_____

Robert Colin Urquhart, Plaintiff acting on his own

Address for delivery: [current designated address on the court record]

Email / telephone: [current contact information on the court record]

Delivery and next step

Prepare and deliver a separate copy to each Defendant whose filed Defence raises the matter, using the address for delivery on the court record. Keep proof of delivery. Under Rule 38.09, an answer is due within ten days and must be filed and delivered. If the answer refuses or does not provide necessary particulars, complete the supporting affidavit in the separate motion packet with the actual Defence, demand, delivery proof, and answer or evidence of non-response. Rule 38.08(5) says this Demand for Particulars may not be filed with the Court.

Do not use this demand to accuse any person of an offence. If no filed Defence raises or relies on the listed allegations, this demand and the conditional motion may have no proper basis.