WORKING DRAFT - 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

INTERROGATORIES

Form 19.05 - NOT FOR COURT FILING

To: Jon Cameron

Answers are demanded from you

Robert Colin Urquhart, the Plaintiff, being satisfied that obtaining answers in this manner will promote the just, speedy, and inexpensive resolution of this proceeding, demands that you answer the questions below under oath or affirmation no more than 20 days after this demand is delivered to you. This demand may be delivered only after pleadings close under Rule 19.05 or as otherwise directed by the Court.

The questions

1. Do you contend that any person named as a defendant in the Plaintiff's currently operative Notice of Action or Statement of Claim is incorrectly named or is a different person from the person intended?

2. For each name you identify as incorrect, what exact name appears in the operative Nova Scotia document?

3. For each name you identify as incorrect, what type of error do you contend occurred: spelling, alias, mistaken identity, or another specified error?

4. What correct legal name, if any, do you know for the person you say was intended by each disputed entry?

5. What address for service or delivery, if any, do you know for each person whose identity you say was incorrectly stated?

6. Does the British Columbia Supreme Court response dated [insert date] in file [insert exact registry and file number] refer to any person named in the current Nova Scotia proceeding?

7. What page and paragraph of that British Columbia response state that a name was incorrect?

8. For each name described as incorrect in that response, what corrected name, if any, did the response give?

9. What non-privileged record, if any, within your knowledge or control supports your position about a disputed name in the current Nova Scotia proceeding?

Refusal to answer questions and excuse by a judge

You must not fail to respond. You may refuse a question that calls for privileged information, information that is irrelevant and will not lead to relevant evidence, or a question that is too complex or elaborated to require an answer. You may make a motion to a judge to be excused from answering a question.

Costs if you fail or refuse to answer

A judge may order you to answer a question and award costs against you.

Deliver your answer to all parties

Deliver your sworn or affirmed response to the Plaintiff at the address for delivery below and deliver a copy to each other party at that party's designated address for delivery.

Dated: _____, 2026

_____

Robert Colin Urquhart, Plaintiff

Plaintiff address for delivery: [copy current designated address from the court record]

Email: [confirm current email on the court record]

Other parties and designated addresses: [copy each from the current court record]

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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

INTERROGATORIES

Form 19.05 - NOT FOR COURT FILING

To: Alan Warkentin

Answers are demanded from you

Robert Colin Urquhart, the Plaintiff, being satisfied that obtaining answers in this manner will promote the just, speedy, and inexpensive resolution of this proceeding, demands that you answer the questions below under oath or affirmation no more than 20 days after this demand is delivered to you. This demand may be delivered only after pleadings close under Rule 19.05 or as otherwise directed by the Court.

The questions

1. Do you contend that any person named as a defendant in the Plaintiff's currently operative Notice of Action or Statement of Claim is incorrectly named or is a different person from the person intended?

2. For each name you identify as incorrect, what exact name appears in the operative Nova Scotia document?

3. For each name you identify as incorrect, what type of error do you contend occurred: spelling, alias, mistaken identity, or another specified error?

4. What correct legal name, if any, do you know for the person you say was intended by each disputed entry?

5. What address for service or delivery, if any, do you know for each person whose identity you say was incorrectly stated?

6. Does the British Columbia Supreme Court response dated [insert date] in file [insert exact registry and file number] refer to any person named in the current Nova Scotia proceeding?

7. What page and paragraph of that British Columbia response state that a name was incorrect?

8. For each name described as incorrect in that response, what corrected name, if any, did the response give?

9. What non-privileged record, if any, within your knowledge or control supports your position about a disputed name in the current Nova Scotia proceeding?

Refusal to answer questions and excuse by a judge

You must not fail to respond. You may refuse a question that calls for privileged information, information that is irrelevant and will not lead to relevant evidence, or a question that is too complex or elaborated to require an answer. You may make a motion to a judge to be excused from answering a question.

Costs if you fail or refuse to answer

A judge may order you to answer a question and award costs against you.

Deliver your answer to all parties

Deliver your sworn or affirmed response to the Plaintiff at the address for delivery below and deliver a copy to each other party at that party's designated address for delivery.

Dated: _____, 2026

_____

Robert Colin Urquhart, Plaintiff

Plaintiff address for delivery: [copy current designated address from the court record]

Email: [confirm current email on the court record]

Other parties and designated addresses: [copy each from the current court record]