

Clerk's Stamp



COURT FILE NO.

COURT Court of King's Bench of Alberta

JUDICIAL CENTRE Lethbridge

PLAINTIFF(S) **FRANCES WIDDOWSON**

DEFENDANT(S) **THE GOVERNORS OF THE UNIVERSITY OF LETHBRIDGE,
UNIVERSITY OF LETHBRIDGE FACULTY ASSOCIATION, DIGVIR
JAYAS, LEROY LITTLE BEAR, PATRICK WILSON, BETH GERWIN,
ARUNDHATI DASGUPTA, KARA GRANZOW, LAURA KEFFERWILKES,
AARON TAYLOR, ROMANY CRAIG, SAURYA DAS, DAVID
SCOTT, CHRIS BURTON, JAMES SMITH, DA AKA PORTER, RY AN
HARPER-BROWN, OLU AWOSOGO, RHYS STEVENS, AARON CHUBB,
JOHN DOE, JANE DOE.**

DOCUMENT **Statement of Claim**

ADDRESS FOR
SERVICE AND
CONTACT
INFORMATION OF
PARTY FILING THIS
DOCUMENT

STAPON LAW LLC
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NOTICE TO DEFENDANT(S)

You are being sued. You are a Defendant.

Go to the end of this document to see what you can do and when you must do it.

Note: State below only facts and not evidence (Rule 13.6)

Statement of facts relied on:

PARTIES

1. The Plaintiff, Frances Widdowson ("Dr. Widdowson"), is an academic and public commentator formerly a tenured professor at Mount Royal University, Calgary, Alberta.
2. The Defendant, The Governors of the University of Lethbridge (the "University"), is a body corporate continued under the Post-secondary Learning Act, SA 2003, c P-19.5, operating a public university with its principal campus at 4401 University Drive West, Lethbridge, Alberta, T1K 3M4, and is named as a Defendant because, as pleaded below, it published the University Community Email, the Ceremony Notice, the Little Bear Statement, and the Media Advisory concerning Dr. Widdowson, and issued and enforced the trespass notice against her.
3. The Defendant, Digvir Jayas, is, at all material times, the President and Vice-Chancellor of the University, and co-authored and co-signed the Ceremony Notice pleaded below in that capacity, and, to the Plaintiff's information and belief, resides in or around Lethbridge, Alberta.
4. The Defendant, Leroy Little Bear, was, at all material times, the Vice-Provost, Iniskim Indigenous Relations of the University and co-authored and co-signed the Ceremony Notice pleaded below and made the further statement pleaded below, in that capacity and/or in a capacity closely associated with the University. To the Plaintiff's information and belief, Dr. Little Bear resides in or around Lethbridge, Alberta.
5. The Defendant, University of Lethbridge Faculty Association ("ULFA"), is the certified bargaining agent/faculty association for academic staff at the University of Lethbridge, and operates the website ulfa.ca on which the statements pleaded below were published.
6. The Defendant, Patrick Wilson, is the Chair of the Gender, Equity and Diversity Committee of ULFA ("GEDC") and is, on the material presently available, a principal author of the communications pleaded below. To the Plaintiff's information and belief, Mr. Wilson resides in or around Lethbridge, Alberta.
7. The Defendant, Beth Gerwin, is the Past Chair of the GEDC. Ms. Gerwin is a proper defendant on the basis that, as a member of the GEDC, she approved, adopted, and/or permitted the publication of the Statement, until such time as she demonstrates no involvement in, or objection to, that publication, and, to the Plaintiff's information and belief, resides in or around Lethbridge, Alberta.
8. The Defendants Arundhati Dasgupta, Kara Granzow, and Laura Keffer-Wilkes are members of the GEDC from the Faculty of Arts & Science, and are proper defendants on the basis that, as members of the GEDC, they approved, adopted, and/or permitted the publication of the Statement,

until such time as they demonstrate no involvement in, or objection to, that publication, and, to the Plaintiff's information and belief, each resides in or around Lethbridge, Alberta.

9. The Defendant Aaron Taylor is a member of the GEDC from the Professional Faculties. Mr. Taylor is a proper defendant on the basis that, as a member of the GEDC, he approved, adopted, and/or permitted the publication of the Statement, until such time as he demonstrates no involvement in, or objection to, that publication, and, to the Plaintiff's information and belief, resides in Lethbridge, Alberta.
10. The Defendant Romany Craig is a member of the GEDC from the Library. Ms. Craig is a proper defendant on the basis that, as a member of the GEDC, she approved, adopted, and/or permitted the publication of the Statement, until such time as she demonstrates no involvement in, or objection to, that publication, and, to the Plaintiff's information and belief, resides in or around Lethbridge, Alberta.
11. The Defendants Saurya Das, David Scott, Chris Burton, James Smith, Danaka Porter, Ryan Harper-Brown, Olu Awosogo, Rhys Stevens, and Aaron Chubb are, respectively, the President, Vice-President, Past-President, Treasurer, Chief Steward, JAC Chair, Bargaining Chair, Grievance Committee Chair, and Executive Director of ULFA and each of these parties is a proper defendant on the basis that the ULFA executive approved, adopted, and/or permitted the publication and continued hosting of the Statement (defined below) on ULFA's website, until such time as any of them demonstrates no involvement in, or objection to, that publication. To the Plaintiff's information and belief, each resides in or around Lethbridge, Alberta.
12. The Defendants John Doe and Jane Doe are other persons who authored, approved, adopted, or ratified the publications described below, whose identities, and consequently whose places of residence, are not presently known. The Plaintiff will apply to substitute their correct names and particulars, including residence, once ascertained through productions and questioning.

BACKGROUND

13. On or about February 4, 2026, Dr. Widdowson attended the University of Lethbridge campus at the invitation of Anthony Hall ("Dr. Hall"), a Professor Emeritus of the University of Lethbridge, to participate in a Spectrum Street Epistemology session on the claim "The Residential Schools Were Genocidal," together with their spouses, Albert Howard and Helena Guenther. Dr. Widdowson is a proponent of Spectrum Street Epistemology, an interactive Socratic method in which participants rate their agreement with a claim and are then invited, through neutral, civil facilitation, to explore the reasons and evidence behind their position, and whether they would change that position if contrary evidence were provided. Spectrum Street Epistemology is designed to be non-confrontational, unlike some other free-expression exercises: it does not declare any "winner" or

“loser,” but seeks only to examine whether a participant becomes more or less certain of a claim in light of the evidence.

14. On February 4, 2026, approximately 30 minutes after Dr. Widdowson announced her intention to attend campus on social media, and as quickly as the University could do so thereafter, the University sent an email to all faculty and students describing Dr. Widdowson as a “controversial figure” whose views were “upsetting and disrespectful” (the “University Community Email”). The University did not name Dr. Widdowson in the University Community Email, stating internally that it did not wish to “amplify her.” The existence and substance of the University Community Email, internally referred to by the University’s own media relations personnel as the “first community message” which “outlines the university’s expectations about behaviour”.
15. In consequence, a large group of students and others converged on the Atrium with the stated or apparent intention of preventing Dr. Widdowson and Dr. Hall from proceeding. Large drums and instruments were used at close range; signs were displayed telling the Plaintiff to “fuck off” and expressing the hope that their “ears bleed”; Ms. Guenther and Mr. Howard were intimidated, harassed, and spat on; Dr. Hall’s papers were damaged; and Dr. Widdowson’s whiteboard, Spectrum Street Epistemology mats, and backpack were stolen in consequence of the warning communication.
16. Further to paragraph 14 herein, later that same day, the University issued a trespass notice against Dr. Widdowson.
17. Later the same day, at approximately 7:30 p.m. on February 4, 2026, the University sent a further email over the name of President Digvir Jayas to all University employees and all students. That email described Dr. Widdowson as “an individual who has recently caused significant disruption at other Canadian universities,” stated that “the views expressed by this individual do not align with the values of the University of Lethbridge,” and recounted that, “[w]hen it became clear that the interactions had no defined end and that continuing to deploy resources in this way was not sustainable, the University issued a trespass notice to the individual at approximately 5:15 p.m.”
18. On February 5, 2026, Patrick Wilson, in his capacity as Chair of the GEDC, wrote in an email to Provost Michelle Helstein stating, among other things, that he was “incredibly proud of our students who came out en masse to show that those views are not accepted or acceptable” in circumstances where Dr. Widdowson’s views and approach had not yet even been heard.
19. In the following week, on a date presently unconfirmed, ULFA published, on its website at ulfa.ca/taking-action/statements/, an undated statement titled “GEDC Statement on Disinformation and Freedom of Expression” (the “Statement”), issued in the name of the GEDC.
20. On or between February 11 to 13, 2026, the University published on its official Notice Board at ulethbridge.ca, and also circulated as a letter addressed to the Chiefs and Councils of the Blackfoot Confederacy and Members of the Siksikaitapi Community, over the names of President

Digvir Jayas, Ikkayiinnii, and Vice-Provost Leroy Little Bear, Ikaisskini, and under the Office of the President, a notice titled “Sweetgrass Over Coals Ceremony” (the “Ceremony Notice”) announcing a ceremony to be held Friday, February 13, 2026, from 10:00 a.m. to 11:00 a.m., in the University Hall Atrium. The Ceremony Notice currently remains publicly accessible on the University’s website.

21. The Ceremony Notice stated that “[a]n individual”, identifiable as Dr. Widdowson, among other things: “occupied public space on campus in an attempt to advance and gain publicity for” views “that do not align with those of Iniskim”; that the University’s environment “was compromised” and that this was “an extremely difficult day for many”; that the ceremony was to “dissipate the negative atmosphere brought by this individual to our community”; and that participants would be “[c]leansing ourselves of the negativity brought to our campus by this individual.”
22. Further to paragraph 19 herein, at the February 13, 2026 ceremony, the Defendant Leroy Little Bear spoke and was recorded on video. At approximately 0:33 of that recording, Dr. Little Bear publicly, and to the full audience, stated, in words to the following effect, that “[t]he ceremony was to dissipate all the negativity that she brought... the whole intent is to dissipate all the negativity that she brought.” At approximately 2:40, Dr. Little Bear stated, in words to the following effect: “The students did a fantastic job of neutralizing her; it’s something that we as an institution have to kind of rethink how to handle these kinds of situations” (together, the “Little Bear Statement”). The words “she” and “her” referred to Dr. Widdowson.
23. The Little Bear Statement was recorded on video, a copy of which is in the Plaintiff’s possession (approximately 3 minutes 9 seconds), and a version of which was published at [facebook.com/watch/?v=1966167487653000](https://www.facebook.com/watch/?v=1966167487653000) on or about February 13, 2026, the date of the ceremony.
24. On April 20, 2026, the University reaffirmed the trespass notice pleaded above, in writing, in apparent anticipation of Dr. Widdowson’s announced return to campus for the coffee meeting pleaded below.
25. On April 24, 2026, ULFA issued to its membership, by email or other electronic internal distribution, a document titled “Individual on Campus Alert” (the “Alert”), addressed “Dear Members,” stating that “[i]t has come to our attention that Frances Widdowson, an individual with a past history of causing disruptions on campus, has announced she will be on the Lethbridge Campus of the UofL today.” Dr. Widdowson’s presence on campus that day was, in fact, for the purpose of having a coffee with a student to explain the methodology of Spectrum Street Epistemology. The Alert stated, among other things: that Members had rights, including under the Alberta Occupational Health and Safety Act, “to work in an environment free from harassment, discrimination, and other threats to health and safety”; that “ULFA considers the presence of this individual to be a clear health and safety risk to this workplace and an inappropriate disruption to our academic work”; that “[i]nformation we have received from the Employer is that Franc[i]s Widdowson will be issued a trespass

notice if she enters campus”; and it encouraged Members to “file a Health and Safety report” and/or contact their Dean “if you find their presence to be harmful or disruptive.” The Alert further stated that Dr. Widdowson “has and may file a freedom of information request and could publish any emails naming her between senior administration and any member of the community.”

26. Further to paragraph 25 herein, the Alert also expressly asserted that “ULFA affirms the importance of academic freedom and open inquiry as articulated in Article 11 of the Collective Agreement.” Notwithstanding this stated affirmation, the Alert immediately went on, in the same document, to characterize Dr. Widdowson's mere anticipated presence on campus - for the stated and, at the time, entirely benign purpose of having a coffee with a student - as “a clear health and safety risk to this workplace and an inappropriate disruption to our academic work,” and to invite Members to formally report her presence as harmful or disruptive before she had done anything on campus that day. ULFA's affirmation of academic freedom and open inquiry was thereby directly contradicted by its own contemporaneous conduct in the same publication.
27. Further to paragraph 25 herein, the Alert's disclosure that ULFA had already been told by “the Employer” that Dr. Widdowson would be issued a trespass notice “if she enters campus” confirms that this was the same trespass notice first issued on February 4, 2026 (para 16 above) and reaffirmed on April 20, 2026 (para 24 above), rather than any fresh assessment of her conduct on her return to campus. At the time the Alert was issued, the only conduct Dr. Widdowson had announced was having a coffee with a student, yet ULFA characterized her mere return to campus for that purpose as a “clear health and safety risk,” relying on the pre-existing trespass status rather than on anything she had done that day. The significance of this sequence to the Plaintiff's allegation of malice is pleaded under the heading MALICE below.
28. The trespass notice was enforced on April 25, 2026, when Dr. Widdowson attended campus to have the coffee meeting with a student described above, resulting in Dr. Widdowson being arrested, handcuffed, and removed from campus by police. The trespass notice and its enforcement are pleaded as relevant to the meaning and effect of, and the damage caused by the Defamatory Statements and the University Statements, and in aggravation of damages.
29. On or about April 27, 2026, the University published on its website (ulethbridge.ca/communications/advisory-response-media) a statement titled “Advisory – Response to Media” (the “Media Advisory”), which was also sent, in writing, directly to media who inquired about the trespass notice, and thereby intended and calculated to be republished by media to the public. The Media Advisory stated of Dr. Widdowson, among other things, that her “ongoing social media promotion” was “encouraging and inciting a crowd response on campus,” and that this “includes videos intended

to provoke University of Lethbridge community members.”

30. On or about June 7, 2026, Dr. Widdowson wrote a letter to the members of the GEDC and the ULFA executive setting out her concerns regarding the Statement, demanding that (i) the GEDC provide evidence for or retract the allegations that she and Dr. Hall were spreading “disinformation and lies,” acting with an “intent to deceive,” or motivated by “prejudice and hate”; (ii) the GEDC and ULFA host a further event on the underlying subject matter with representatives of her choosing; and (iii) the Defendants refrain from further unsubstantiated allegations concerning her character, motives, or intentions, and warning that legal action would follow absent a satisfactory response. The letter was copied to, among others, Digvir Jayas, Michelle Helstein, and Leroy Little Bear (each thereby having personal notice of the specific allegations and demands by June 7, 2026), and to Myles McDougall, then Minister of Advanced Education, and Danielle Smith, Premier of Alberta. No retraction, apology, or substantive response had been received as of the date of this pleading.

THE DEFAMATORY STATEMENTS

31. The Statement, addressed “Dear Members,” opened by stating that its authors were “deeply disturbed by the presence of two individuals on campus last week intent on spreading disinformation based on prejudice and hate”, the “two individuals” clearly being and referencing Dr. Widdowson and Dr. Hall.
32. The Statement contained, among others, the following assertions concerning Dr. Widdowson and Dr. Hall by name or clear identification:
- a) that they were “intent on spreading **disinformation** based on **prejudice and hate**”;
 - b) that they promoted “**disinformation and lies**” and “**disinformation and untruth with an intent to deceive**”;
 - c) that they were among “[t]hose seeking to do harm through **disinformation**” who “**do not adhere to the norms of collegial exchange of ideas, nor are they concerned with evidence-based inquiry**”;
 - d) that “[t]he message these individuals sought to spread **caused harm** to many members of our campus and broader community,” including “emotional and psychological harm” and “at least two instances of physical harm visited upon members of our campus community”;
 - e) that Indigenous colleagues and students “chose to leave campus to avoid the harm these individuals perpetrate”;
 - f) that they “arrive[d] on our campus with **the intention of inflicting harm on others**” and “are the ones who should not be welcome to stay”; and
 - g) that their expression was, or approached, “**hate speech**” - the Statement calling on the Administration “to draw a line between healthy debate and hate speech - the latter should

never be tolerated on our campus or in our society, and it should not be shielded by freedom of expression” - in a context making clear the “hate speech” referred to was that of Dr. Widdowson and Dr. Hall,

(collectively, the “GEDC Statements”), together with a statement that ULFA/the GEDC was “encouraged by the overwhelming turnout of students, faculty and staff to protest their presence and disrupt their intentions.”

33. The Statement further stated that, “while encouraged by such protest, we also state strongly that those students, faculty and staff should not have had their day disrupted in this way.” This qualification does not diminish the defamatory character of the Statement. The Statement’s expression of regret is directed to the disruption experienced by the protesting students, faculty, and staff, not to any harm done to Dr. Widdowson; the Statement nowhere retracts, qualifies, or expresses reservation about its characterization of Dr. Widdowson and Dr. Hall as persons spreading “disinformation and lies” motivated by “prejudice and hate,” and it expressly reaffirms that the GEDC was “encouraged” by the very protest that intimidated, harassed, and dispossessed them. The qualification therefore confirms, rather than softens, the Statement’s adoption and endorsement of the students’ conduct against the Plaintiff.
34. In their ordinary and natural meaning and, further or in the alternative, by way of innuendo arising from circumstances known to their recipients - including that the Statement was published in the week following the events of February 4, 2026, that it expressly identified “two individuals on campus last week,” and that the identity of those individuals was known throughout the University community from the University Community Email and from contemporaneous media reporting - the GEDC Statements meant, and were understood by reasonable recipients to mean, that the Plaintiff:
- a) knowingly spread falsehoods;
 - b) was motivated by prejudice and hatred, rather than by sincerely held and reasoned academic views;
 - c) intended, and set out, to deceive and to inflict harm on members of the university community, i.e., acted with a species of criminal or quasi-criminal intent akin to fraud or assault rather than as a participant in legitimate academic debate;
 - d) caused, and was responsible for, actual physical harm to members of the campus community, when in actuality the Plaintiff physically harmed no one and was herself confronted by a hostile crowd, harassed, and had her property damaged and stolen, as the Defendants knew or ought to have known;
 - e) engaged in criminal conduct, namely “hate speech”, which is an offence under the Criminal Code of Canada.
35. Each of these imputations is defamatory subjecting Dr. Widdowson to public, personal, and

professional disrespect and odium. An accusation that an academic knowingly disseminates falsehoods, and does so out of prejudice and hatred rather than genuine scholarly conviction, strikes at the foundation of her professional standing: the disinterested pursuit of truth is the defining obligation of the scholarly vocation, and an academic said to have abandoned it is said to be unfit for it. An accusation that she attended campus intending to inflict harm on others, and in fact caused “at least two instances of physical harm,” imputes conduct that is not merely discreditable but tortious and potentially criminal. An accusation that her expression constituted or approached “hate speech” imputes the commission of an offence under the Criminal Code. These are not characterizations of Dr. Widdowson’s opinions as wrong, unpopular, or poorly reasoned, which she would be obliged to endure as a participant in any public or one-on-one debate or discussion; they are assertions of fact about her honesty, her motives, and her conduct, and they were published to the academic community and to the public at large as the considered position of a knowledgeable and respected faculty association of the very institution at which she was speaking.

36. As pleaded at paragraph 25 above, on April 24, 2026 ULFA published to its entire membership the Alert concerning Dr. Widdowson’s attendance on campus that day. The Alert was distributed to the academic staff of the University - that is, to Dr. Widdowson’s own professional peer group and to the community of scholars among whom her professional reputation subsists. The Alert is the second of the publications comprising the Defamatory Statements, the first being the Statement pleaded at paragraphs 31 to 35 above.
37. The Alert contained, among others, the following assertions concerning Dr. Widdowson, who was named in it:
 - a) that she was “an individual with a past history of causing disruptions on campus”;
 - b) that “ULFA considers the presence of this individual to be a clear health and safety risk to this workplace and an inappropriate disruption to our academic work,” expressly invoking Members’ rights under the Alberta Occupational Health and Safety Act “to work in an environment free from harassment, discrimination, and other threats to health and safety”; and
 - c) that Members were encouraged to “file a Health and Safety report” and/or to contact their Dean “if you find their presence to be harmful or disruptive,”
(collectively, the “Alert Statement,” and together with the GEDC Statements, the “Defamatory Statements”).
38. In its ordinary and natural meaning and, further or in the alternative, by way of innuendo arising from circumstances known to its recipients, the Alert Statement meant, and was understood by reasonable recipients to mean, that the Plaintiff: (a) had, by her own conduct, repeatedly and personally caused disruption on university campuses, and was herself the author of such disruption rather than the occasion for the misconduct of others; (b) posed a genuine risk to the health and safety of those working at the University, of a kind against

which occupational health and safety legislation exists to protect; and (c) was a person whose mere presence on campus was properly the subject of formal workplace safety complaints and reporting.

39. Each of these imputations is defamatory. By characterizing Dr. Widdowson's mere presence on campus as "a clear health and safety risk to this workplace," and by framing that characterization expressly within the protections of the Alberta Occupational Health and Safety Act against "harassment, discrimination, and other threats to health and safety," the Alert imputed to Dr. Widdowson a propensity to conduct of the kind that legislation exists to guard against, namely harassment of, or a threat to the physical or psychological safety of her academic colleagues. By further inviting Members to lodge formal occupational health and safety reports against her, the Alert cast Dr. Widdowson not as a scholar holding contested views but as a workplace hazard to be documented and managed. These imputations were conveyed to the very audience - her fellow academics - among whom Dr. Widdowson's professional standing is established and maintained, and in circumstances in which the sole announced purpose of her attendance was a private coffee meeting with a single student.
40. The GEDC Statements and the Alert Statement would each tend to lower the Plaintiff in the estimation of ordinary reasonable members of society generally and would expose her to hatred, ridicule, and contempt.
41. The words referred, and were understood to refer, to Dr. Widdowson specifically, whether by name or as clearly identifiable from the surrounding circumstances known to recipients. Although the Statement referred to "two individuals" and named Dr. Hall alongside her, this does not diminish its reference to, or its defamatory effect upon, Dr. Widdowson.
42. The University published four further statements concerning Dr. Widdowson: the University Community Email of February 4, 2026; the Ceremony Notice published on or about February 11 to 13, 2026; the Little Bear Statement made at the ceremony of February 13, 2026; and the Media Advisory published on or about April 27, 2026 (together, the "University Statements"). These are the third group of publications complained of, the first being the GEDC Statements pleaded at paragraphs 31 to 35 above and the second being the Alert Statement pleaded at paragraphs 36 to 41 above. Each of the University Statements is pleaded in turn below.
43. In the University Community Email, sent at approximately 11:01 a.m. on February 4, 2026 over the University's name to all University employees and all students, the University stated that "a controversial figure is planning to engage our campus community" and that "[t]his individual has recently created significant disruptions at other Canadian universities"; that "[t]he views of this individual are upsetting and disrespectful to many members of the university community"; and that "this individual's recent visits to other Canadian universities have resulted in unpredictable and, at

times, confrontational interactions,” that “this person has recorded and shared interactions on social media to advance her particular narratives,” and that “[s]ignificant attention, or inappropriate or unlawful conduct by members of our community may be used to amplify the narratives this individual seeks to promote.” The University did not name Dr. Widdowson, but her identity was known to recipients for the reasons pleaded above.

44. In its ordinary and natural meaning, the University Community Email meant, and was understood by reasonable recipients to mean, that Dr. Widdowson: (a) held and expressed views that were not merely controversial but inherently “upsetting and disrespectful,” such that she was a proper object of an institution-wide warning to the entire faculty and student body; and (b) attended campus not in good faith to engage in academic exchange but to “advance her particular narratives” and to court “attention” and publicity for herself.
45. That imputation is defamatory. To circulate to an entire university community, in advance of a scholar’s arrival, a warning that her views are “upsetting and disrespectful” is not to describe a disagreement but to mark her out as a person whose presence requires institutional caution. Coming from the University itself, and addressed to the academic community in which Dr. Widdowson’s professional standing subsists, it invited its recipients to treat her not as a scholar advancing a contested position but as a disruptive presence to be guarded against and whose views should not be permitted to be heard, and did so before she had set foot on campus or said anything at all. The further imputation - that Dr. Widdowson attends not to inquire but to “advance her particular narratives” and court “attention” - compounds the sting, portraying her as a bad-faith publicity-seeker rather than a scholar pursuing a contested question.
46. In the Ceremony Notice, published on or about February 11 to 13, 2026 on the University’s public Notice Board and circulated to the Chiefs and Councils of the Blackfoot Confederacy and Members of the Siksikaitapi Community, the University stated of “[a]n individual”, identifiable as Dr. Widdowson, that she had “occupied public space on campus in an attempt to advance and gain publicity for” views “that do not align with those of Iniskim”; that the University’s environment “was compromised” and that this was “an extremely difficult day for many”; that a sacred ceremony would be held to “dissipate the negative atmosphere brought by this individual to our community”; and that participants would be “[c]leansing ourselves of the negativity brought to our campus by this individual.”
47. In their ordinary and natural meaning, the words complained of in the Ceremony Notice meant, and were understood to mean, that Dr. Widdowson: (a) attended campus in bad faith, not to engage in academic exchange but merely “to advance and gain publicity” for her views; and (b) was a source of “negativity” and communal or spiritual contamination, personally “brought” by her, so serious that the University community required a formal, public ceremony to “cleanse” itself of it.
48. Further, or in the alternative, the Ceremony Notice bore those meanings by way of innuendo,

arising from circumstances known to its recipients. Those circumstances include that the University did not merely publish words but convened, publicized, and opened to media a formal sacred ceremony expressly directed at “dissipat[ing] the negative atmosphere brought by this individual” and at “[c]leansing” the community “of the negativity brought to our campus by this individual”; that the ceremony was convened by the University’s most senior officers and held in a central campus building; and that recipients knew, from the events of February 4, 2026, from the University Community Email circulated that day, and from contemporaneous media reporting, that the “individual” so described was Dr. Widdowson.

49. Those imputations are defamatory. To describe a scholar’s presence as having brought “negativity” to a community, and to convene a formal, publicized ceremony for the express purpose of “cleansing” that community of it, is to cast her not as a person whose views are contested but as a source of contamination from which others require purification - an imputation of a kind particularly damaging to a scholar, whose standing depends upon being regarded as a legitimate participant in academic life. A reasonable recipient would understand the University to be asserting not that Dr. Widdowson held views with which it disagreed, but that her presence had inflicted a harm upon the community of a character requiring ceremonial remedy. The imputation of bad faith attendance compounds this, denying her even the standing of a sincere participant in academic debate.
50. In the Little Bear Statement, made at the University-convened ceremony of February 13, 2026 and published to those in attendance, to the media invited to attend, and thereafter on Facebook, the Defendant Leroy Little Bear stated, on the University’s behalf, that the ceremony was to “dissipate all the negativity that she brought” and that “[t]he students did a fantastic job of neutralizing her.”
51. In its ordinary and natural meaning, the Little Bear Statement meant, and was understood to mean, that Dr. Widdowson was a legitimate target of coercive “neutralization” by students, and that the students’ conduct in “neutralizing her” - including the intimidation, harassment, property damage, and theft pleaded above - was praiseworthy.
52. That imputation is defamatory. To state, on the University’s behalf and at a ceremony it convened, that the students “did a fantastic job of neutralizing her” is to commend, as the institution’s own assessment, conduct that in fact comprised intimidation, harassment, and the theft and destruction of property. The necessary implication is that Dr. Widdowson was a person against whom such conduct was warranted - that she had forfeited the ordinary protections afforded to a speaker on a university campus and deserved to be silenced by force rather than answered by argument. Coming from the Vice-Provost, Iniskim Indigenous Relations, and published to those present and to the media invited to attend, the statement carried the University’s institutional endorsement of that view.
53. In the Media Advisory, published on or about April 27, 2026 on the University’s website and

provided directly to media for republication, the University stated of Dr. Widdowson that her “ongoing social media promotion” was “encouraging and inciting a crowd response on campus,” and that this “includes videos intended to provoke University of Lethbridge community members.”

54. In its ordinary and natural meaning, the Media Advisory meant, and was understood to mean, that Dr. Widdowson deliberately sought to “provoke” and “incite” disorder on campus.
55. That imputation is defamatory. To assert that a scholar published “videos intended to provoke” and was “encouraging and inciting a crowd response” on campus is to impute a deliberate intention to cause disorder rather than to conduct academic inquiry. That assertion was made to media expressly for republication to the public at large, and thereby to an audience far beyond the University community.
56. Each of the University Statements referred to, and was understood by its recipients to refer to, Dr. Widdowson specifically, whether by name or as clearly identifiable from the surrounding circumstances known to recipients. The Media Advisory named Dr. Widdowson expressly. Although the University Community Email, the Ceremony Notice, and the Little Bear Statement did not name her, referring to her only as “an individual” or as “she,” her identity was known throughout the University community from the events of February 4, 2026 and from contemporaneous media reporting; the University itself acknowledged internally that it had declined to name her only because it did not wish to “amplify her.” The University Statements would each tend to lower Dr. Widdowson in the estimation of ordinary reasonable members of society generally and would expose her to hatred, ridicule, and contempt.

PUBLICATION

57. The GEDC Statements were published on ULFA's publicly accessible website and communicated to, and understood by, ULFA members, University faculty, staff, and members of the public who accessed the site.
58. The Alert Statement was published and communicated to the full ULFA membership by email or other internal distribution on or about April 24, 2026.
59. The University Community Email was published and communicated to all faculty and students of the University.
60. The Ceremony Notice was published on the University's official public Notice Board at ulethbridge.ca, where it was communicated to University faculty, staff, students, and members of the public who accessed it, and where it remains accessible; it was further communicated, as a letter, to the Chiefs and Councils of the Blackfoot Confederacy and Members of the Siksikaitapi Community.

61. The Little Bear Statement was published and communicated to those attending the February 13, 2026 ceremony and, through the media invited to attend, more broadly to the public.
62. The Media Advisory was published on the University's website and was provided directly to media; the University is liable for its republication by media, such republication having been authorized by, and being the natural and probable result of, the University's provision of the Media Advisory for that purpose.
63. Further, or in the alternative, the Plaintiff relies on the multiple publication rule: each access to the GEDC Statements while posted on ulfa.ca, to the Ceremony Notice while posted on ulethbridge.ca, to the Media Advisory while posted on the University's website, and to the recording of the Little Bear Statement while posted on Facebook, constituted a fresh and separate publication. Each of these publications remained, or remains, accessible to the public, and the Plaintiff pleads that the Defendants' continued hosting of them following receipt of the Plaintiff's letter of June 7, 2026 demanding a retraction constitutes continuing publication.
64. The Defendants are liable for any republication of the Defamatory Statements and the University Statements by media outlets and other third parties because their publications were intended to be broadly circulated. Each of those statements was published on a publicly accessible website, provided directly to media, or made at an event to which media were invited. Republication was in each case authorized by the Defendants, or was the natural and probable consequence of the manner in which they chose to publish. The Plaintiff pleads that the Defendants intended, or ought reasonably to have foreseen, that the statements would be reported, quoted, excerpted, linked, shared, and reposted by third parties, including by news outlets and on social media platforms.
65. The full extent of any such republication is not presently known to the Plaintiff and is a matter for discovery. The Plaintiff reserves the right to amend this pleading to particularize any republication of the Defamatory Statements or the University Statements once identified.
66. The publications particularized above are those presently known to the Plaintiff. The Plaintiff pleads that the Defendants, or persons acting on their behalf, may have published or republished the Defamatory Statements and the University Statements, in whole or in part, on further occasions and through further channels not presently known to the Plaintiff, including institutional and personal social media accounts, mailing lists, newsletters, intranet or learning management systems, media interviews, and communications to third parties including government officials, other post-secondary institutions, and professional bodies. The full extent of such publication is within the knowledge of the Defendants and not of the Plaintiff. The Plaintiff will seek particulars and productions in respect of all such publications and reserves the right to amend this pleading to particularize them once identified.
67. The Plaintiff will seek particulars and productions, including by questioning, as to: (i) who

drafted, approved, and authorized the publication of each of the Defamatory Statements and the University Statements; (ii) the process by which the GEDC, the ULFA executive, and the University approved publication; (iii) the full extent of internal and external distribution of each publication, including every website, social media account, mailing list, and other channel on or through which it was published or republished, and the period during which each remained accessible; and (iv) any further communications concerning the Plaintiff, whether before or after the events pleaded above.

68. The individual Defendants acted within the scope of, and in the purported course of, their offices and duties within the GEDC, ULFA, and/or the University, and the Defendants ULFA and the University are vicariously liable for the publications made by their respective officers, employees, and committees. Further, or in the alternative, the Defendants who authored, approved, adopted, ratified, or facilitated the Defamatory Statements or the University Statements acted in concert and in furtherance of a common design to condemn and exclude the Plaintiff, and are jointly and severally liable as joint tortfeasors for the resulting harm.

FALSITY

69. The Defamatory Statements and the University Statements are false. Dr. Widdowson did not spread disinformation or lies, was not motivated by prejudice or hatred, did not intend to deceive or harm anyone, did not engage in hate speech, did not cause physical harm to any person, did not pose a health and safety risk warranting an institution-wide alert or an occupational health and safety report, has not, by her own conduct, caused disruption on the University's campus as the Alert imputed, and did not attend campus in bad faith or for the purpose of provoking or inciting disorder. Where disruption has attended her appearances, it has been caused by those who attended to protest and prevent her exercise of inquiry, not by Dr. Widdowson, who has done no more than seek to conduct civil, structured academic discussion. Her attendance on February 4, 2026 was for the stated academic purpose of participating in a Spectrum Street Epistemology exercise on a contested public question. Contrary to the characterization in the University Statements that Dr. Widdowson improperly "occupied public space" to "advance and gain publicity" for her views, she made no booking and required none: she attended a public space on a public university campus that was open to her, as the University's own internal correspondence confirms.
70. Further, the characterizations of Dr. Widdowson in the University Statements are false. Dr. Widdowson's views on the residential schools and related questions are sincerely held academic positions advanced on the basis of evidence-based research analysis and argument, and are not properly described as "upsetting and disrespectful." Nor did Dr. Widdowson bring any "negativity" to the University or create any "negative atmosphere"

requiring communal “cleansing”: she attended campus to conduct a structured academic exercise inviting participants to examine the evidence for a contested proposition, and such disorder as occurred on February 4, 2026 was caused by the alert itself and by those who attended in order to prevent that exercise from proceeding, and not by Dr. Widdowson. The University’s own contemporaneous internal records, pleaded below, are inconsistent with the characterization of Dr. Widdowson as the source of any such atmosphere. Nor did Dr. Widdowson attend campus to “advance her particular narratives” or to court “attention” or publicity, as the University Community Email asserted: she deliberately did not create or circulate any poster or public notice for the February 4, 2026 session, precisely because she did not wish to attract a crowd, and attended only to conduct a quiet, structured exercise with a small number of participants. The “advance her particular narratives” and “gain publicity” characterizations invert the truth: rather than seeking attention, Dr. Widdowson took deliberate steps to minimize publicity, and the assertion that she is a mere attention-seeker without a legitimate message mischaracterizes a scholar engaged in good-faith academic inquiry.

71. The assertion that Dr. Widdowson caused or perpetrated “physical harm” is false. Dr. Widdowson did not assault, strike, or physically harm any person on February 4, 2026. On the contrary, Dr. Widdowson was herself a target of the hostile conduct that day: her whiteboard, Spectrum Street Epistemology mats, and backpack were taken, and she was confronted at close range by a large and hostile crowd. The Lethbridge Police Service confirmed, by email, that it was conducting “a few assault investigations from different people involved in the event” and was reviewing video footage of the event, which the University itself later described, in an internal communication, as “very helpful”; the Plaintiff is not aware of any such investigation concerning conduct by Dr. Widdowson.
72. Further, the Defendants’ own contemporaneous internal text messages, exchanged among University personnel and campus security, contradict the public characterizations of the February 4, 2026 event as an uncontrollable safety crisis caused by the Plaintiff. Those text messages record, among other things, that University personnel reported the gathering as “loud but peaceful,” estimated the crowd at approximately 200–250 persons at a class changeover, and stated that “the University has no plan to remove her from campus and are focussing on the safety of all in the area” - in contrast to the Defendants’ subsequent public assertions that the situation could not be safely managed and that the Plaintiff was a source of danger. Those same records show, in real time, that from Dr. Widdowson’s arrival at approximately 11:00 a.m. until at least 1:24 p.m., more than two hours, University personnel on site described the gathering as “loud but peaceful,” that a supporter’s request that she leave at 1:24 p.m. was unsuccessful only because Dr. Widdowson chose to remain “as long as there are people here,” and that it was not until numbers began to escalate later in the

afternoon that additional police resources were called; the trespass notice was not issued until 5:15 p.m., after more than six hours of monitored, generally peaceful assembly. This documented chronology is inconsistent with, and directly undermines, the Defendants' characterization of the day as an unmanageable safety emergency precipitated by the Plaintiff.

73. Independently of the foregoing, falsity is presumed once the elements of the cause of action are established, and the onus is on the Defendants to prove the truth of the Defamatory Statements and the University Statements in substance and in fact.

MALICE

74. Further, or in the alternative, in the event any Defendant pleads qualified privilege, fair comment, or responsible communication, the Plaintiff pleads that the relevant Defendant(s) were actuated by express or determined malice in the making and publication of the Defamatory Statements and the University Statements, particulars of which include:

- a) the escalation, in the Statement, from characterizing the Plaintiff's position as "disinformation" (potentially a matter of fair comment) to asserting, as fact, that it was motivated by "prejudice and hate" and an "intent to deceive" and "intention of inflicting harm" - allegations of a fundamentally different character going to dishonesty and malicious intent rather than to the merits of a contested academic question;
- b) the deliberate decision of the GEDC, evident on the face of the Statement, to go beyond the University administration's own characterization: the Statement expressly quotes President Jayas's more measured statement that the views "do not align with the values of the University of Lethbridge," rejects it as insufficient ("this is more than a question of values"), and insists instead that the Plaintiff's views be branded "disinformation," "lies," and "hate speech", demonstrating a considered intention to characterize the Plaintiff in the most damaging terms available;
- c) the Defendant Patrick Wilson's own, personally-held characterization of the Plaintiff's speech as "hateful", expressed internally in the days before the Statement was published (the Statement's exact publication date being otherwise unconfirmed): in an email exchange on February 5, 2026 among University administration (Provost Michelle Helstein, President Digvir Jayas, and others), Provost Helstein described one internal viewpoint, identified as Mr. Wilson's own perspective, as being "that (1) she should not even be permitted on campus given the hateful nature of her overall speech, and the

lack of rigour, etc.” - a characterization formed in circumstances where Dr. Widdowson’s conduct on campus was publicly available on her livestream and could have been assessed directly. Mr. Wilson, as Chair of the GEDC and its principal author, thereby held and expressed a personal view that the Plaintiff’s speech was “hateful” before the Statement was published in substantially those terms, evidencing that the Statement’s characterization reflected his own pre-formed animus rather than a dispassionate institutional assessment;

- d) the assertion that Dr. Widdowson caused “physical harm” to campus community members, made when the Defendants knew or were recklessly indifferent to the fact that Dr. Widdowson had herself been confronted by a hostile crowd and had her property taken, and that the police assault investigations then under way did not concern any conduct by Dr. Widdowson;
- e) the reckless indifference of the Defendants to the truth or falsity of the assertions of “disinformation,” “lies,” “prejudice and hate,” and “hate speech,” published without any, or any adequate, inquiry into the Plaintiff’s actual views, purpose, or conduct;
- f) the GEDC’s and ULFA’s failure to seek out or accurately report the Plaintiff’s own explanation of her purpose in attending campus before publishing the Statement;
- g) the publication and continued hosting of the Statement on a public website without qualification or retraction, despite the June 7, 2026 demand;
- h) the ULFA Alert’s express warning to Members that Dr. Widdowson “has and may file a freedom of information request and could publish any emails naming her,” which evidences the Defendants’ awareness that their statements concerning her were being documented and were potentially indefensible, and a corresponding intention to caution Members against creating a record rather than to refrain from making false statements;
- i) ULFA’s express solicitation, in the Alert, of formal occupational health and safety complaints against Dr. Widdowson, encouraging Members to “file a Health and Safety report” and/or to contact their Dean “if you find their presence to be harmful or disruptive.” ULFA thereby went beyond publishing its own characterization of Dr. Widdowson and set out to generate a documentary record of complaints against her, at a time when the only conduct she had announced was a private coffee meeting with a student and when ULFA had no reason to anticipate any conduct capable of

founding such a complaint. The solicitation of complaints in those circumstances evidences an intention to manufacture institutional justification for excluding her, rather than any genuine concern for the safety of Members; the Defendants had no objective basis to regard Dr. Widdowson as a threat to health or safety - she had announced no conduct beyond a private conversation, disavows violence, and did nothing on any occasion pleaded to threaten the physical safety of any person - and the Defendants instead treated disagreement with her views, and the discomfort those views occasioned, as though it were a danger to safety, deploying the language of "harassment," "threats to health and safety," and "risk" to describe what was in truth the anticipated expression of contested academic opinion by a speaker the Defendants had unilaterally and in advance determined to be unwelcome;

- j) the fact that, as the Alert itself disclosed, the University had determined to issue Dr. Widdowson a trespass notice "if she enters campus" before she had engaged in any conduct on her return to campus, the only announced purpose of her attendance that day being a private coffee meeting with a student; the Defendants' characterization of that attendance as a "clear health and safety risk" was therefore not a genuine response to any conduct on her part, but a pretext recycling the University's earlier and contested characterization of her, evidencing a fixed and predetermined intention to exclude and condemn her irrespective of her actual conduct;
- k) the University's decision to convene, publicize, and open to media a formal ceremony for the express purpose of "dissipat[ing] the negative atmosphere brought by this individual" and "[c]leansing ourselves of the negativity brought to our campus by this individual," and to publish that purpose over the names of its President and Vice-Provost, when the University's own contemporaneous internal records described the events of February 4, 2026 as "loud but peaceful" and recorded that it had "no plan to remove her from campus"; the public characterization of the Plaintiff as a source of communal contamination was therefore known by the University to be inconsistent with its own assessment of what had occurred;
- l) the Defendant Leroy Little Bear's statement, made on the University's behalf at a University-convened and media-attended ceremony, that the students "did a fantastic job of neutralizing her," by which the University publicly commended conduct comprising the intimidation, harassment, property damage, and theft pleaded above; and the University's

subsequent publication of the Media Advisory asserting that the Plaintiff acted to “provoke” and “incite” a crowd response, published without any, or any adequate, inquiry into the Plaintiff’s actual conduct or purpose;

- m) further to paragraph 43 herein, the University’s publication of the University Community Email on February 4, 2026, characterizing Dr. Widdowson as a “controversial figure” whose views were “upsetting and disrespectful,” issued within approximately thirty minutes of learning of her intended attendance and without any inquiry of Dr. Widdowson as to her purpose in attending; the University acknowledged internally that it deliberately declined to name her because it did not wish to “amplify her,” while nonetheless circulating to the entire faculty and student body a characterization calculated to identify her to those who knew of her intended visit and to prejudice the academic exercise she had come to conduct;
- n) the University’s repetition, across its 11:01 a.m. and 7:30 p.m. emails of February 4, 2026 and the Ceremony Notice, of the characterization of Dr. Widdowson as a person who brings “disruption” wherever she goes, deployed to frame her mere anticipated attendance as a threat and to justify the response taken against her, rather than to describe anything she did on campus; and the University’s failure, having warned its community about Dr. Widdowson, to take any step to remind students of their own obligations under the University’s Statement on Free Expression not to interfere with the expression of others, even as University resources were used in the disruption of Dr. Widdowson’s exercise;
- o) the assertion, in the Ceremony Notice, that Dr. Widdowson had “occupied public space on campus in an attempt to advance and gain publicity” for her views, when the University knew from its own records that she had attended a public space on a public campus that required no booking and was open to her, and that she had done so to conduct a Spectrum Street Epistemology exercise with Dr. Hall; and the further assertion, in the Alert, that Dr. Widdowson had “a past history of causing disruptions on campus,” published without any, or any adequate, inquiry into the circumstances of the events relied upon or the Plaintiff’s responsibility for them;
- p) the dominant purpose of the Defendants, to be inferred from the whole of the conduct pleaded, of silencing and punishing the Plaintiff for expressing views the Defendants opposed, rather than of contributing to reasoned debate; and
- q) such further particulars as counsel may advise, including any that emerge through productions and questioning.

DAMAGES

75. As a result of the Defamatory Statements and the University Statements, the Plaintiff has suffered, and continues to suffer, damage to reputation, for which general damages are presumed pursuant to section 2 of the Defamation Act, RSA 2000, c D-7, and are, regardless, pleaded and claimed.
76. The Plaintiff pleads and relies on the following in aggravation of damages: the escalating and unsubstantiated nature of the allegations; the gravity of the imputations (dishonesty, hatred, criminality, and the infliction of physical harm); the standing and apparent authority of the Defendants, including a University President, a Vice-Provost, and an institutional faculty association, which lent credibility to the Defamatory Statements and the University Statements; the number and repetition of the Defamatory Statements and the University Statements across multiple publications (the GEDC Statements, the Alert Statement, the University Community Email, the Ceremony Notice, the Little Bear Statement, and the Media Advisory); the wide and deliberate mode of publication, including publication to the world at large on public websites and, in the case of the Media Advisory, directly to media for republication; the absence of any retraction or apology despite the demand of June 7, 2026; the continued accessibility of the Ceremony Notice and the other publications, and the Defendants' continued hosting of them after that demand; the publication of the University Community Email and the Alert Statement to the academic community in which the Plaintiff's professional reputation subsists, and to which she must look for future engagement; ULFA's solicitation of formal occupational health and safety complaints against the Plaintiff, and its warning to Members that she might obtain and publish records naming her; the consequences of the Defendants' conduct for the Plaintiff, including the issuance and enforcement of the trespass notice and her arrest, handcuffing, and removal from campus by police on April 25, 2026; the Plaintiff's treatment on February 4, 2026, when she was confronted by a hostile crowd, harassed, and had her property damaged and stolen, and the Defendants' subsequent public commendation of that conduct; and the malice pleaded above.
77. The Plaintiff further pleads that the Defamatory Statements and the University Statements, taken together, constituted an effort to silence, punish, and drive from public life a speaker whose views the Defendants opposed, by means of intimidation and defamation, rather than by reasoned response; conduct that strikes at the value of free expression and warrants the Court's denunciation through an award of aggravated and punitive damages. Such conduct, when engaged in by senior officers of a public post-secondary institution and its faculty association, teaches by example: it signals to students that unpopular or unwelcome inquiry will be met not with reasoned engagement but with condemnation, exclusion, and public shaming. That lesson, absorbed by the very students the Defendants are charged with

educating, threatens to erode the intellectual curiosity and rigorous, evidence-based inquiry that a functioning academy depends on and, as those students go on to enter and shape the workforce and society at large, the harm occasioned by the Defendants' conduct extends far beyond the Plaintiff to the public interest in a citizenry capable of independent thought.

78. The Plaintiff further claims punitive and aggravated damages on the basis that the conduct pleaded above was high-handed, malicious, and a marked departure from ordinary standards of decent conduct, particularly on the part of senior officers of a public institution involved in higher education with an affirmative duty to permit full and free academic inquiry, such that an award of general and aggravated damages alone would be insufficient to accomplish the objectives of denunciation, deterrence, and punishment. The occupations and positions of the Defendants require public monetary sanction to discourage conduct by educators and administrators of institutions of higher learning. Further, despite Dr. Widdowson's demand of June 7, 2026 for a retraction and apology, as pleaded at paragraph 30 above, no Defendant has offered any apology or expressed any regret for the Defamatory Statements or the University Statements, evidencing a continuing and unrepentant disregard for the harm caused and reinforcing the need for an award of punitive damages.
79. Further, or in the alternative, the Plaintiff has suffered special damages, particulars of which are to be provided, including loss of speaking engagements and honoraria, loss of teaching and lecturing opportunities, and loss of consulting and other professional opportunities with universities and institutions that have declined to engage the Plaintiff following, and as a result of, the Defamatory Statements and the University Statements. The Plaintiff further pleads that her exclusion from the University of Lethbridge campus, and the publicity attending her arrest and removal from it, have compounded that loss.

Remedy sought

80. The Plaintiff claims against the Defendants, jointly and severally:
- (a) general damages for defamation in the amount of \$1,000,000.00;
 - (b) aggravated damages in the amount of \$1,000,000.00;
 - (c) punitive damages in the amount of \$1,000,000.00;
 - (d) special damages, as particularized above and to be further particularized, in an amount to be proven at trial;
 - (e) a permanent injunction restraining each Defendant, and all persons acting in concert with any Defendant, from further publishing the Defamatory Statements or the University Statements, or statements to like effect, and requiring each Defendant to remove the Defamatory Statements and the University Statements from every website, social media account, and other channel

within that Defendant's possession or control;

- (f) pre-judgment and post-judgment interest pursuant to the Judgment Interest Act, RSA 2000, c J-1;
- (g) costs of this action on a solicitor and own client basis;
- (h) in the event the Plaintiff is successful against some, but not all, of the Defendants, an order (a Bullock order) that any Defendant against whom judgment is obtained pay to the Plaintiff, in addition to the Plaintiff's costs of the action as against that Defendant, the costs the Plaintiff is ordered to pay to any Defendant against whom the action is dismissed; or, in the alternative, an order (a Sanderson order) that any Defendant against whom judgment is obtained pay the costs of the successful Defendant(s) directly, in either case on the basis that it was reasonable and necessary for the Plaintiff to name and pursue all of the Defendants herein; and
- (i) such further and other relief as counsel may advise and this Honourable Court deems just.

TRIAL BY JURY: The Plaintiff requires that this action be tried by jury, pursuant to the Plaintiff's right to elect a jury in a defamation action.

PLACE OF TRIAL: Lethbridge, Alberta

NOTICE TO DEFENDANT(S)

You only have a short time to do something to defend yourself against this claim:

- 20 days if you are served in Alberta
- 1 month if you are served outside Alberta but in Canada
- 2 months if you are served outside Canada.

You can respond by filing a statement of defence or a demand for notice in the office of the clerk of the Court of King's Bench at Lethbridge, Alberta, AND serving your statement of defence or a demand for notice on the plaintiff's(s') address for service.

WARNING

If you do not file and serve a statement of defence or a demand for notice within your time period, you risk losing the law suit automatically. If you do not file, or do not serve, or are late in doing either of these things, a court may give a judgment to the plaintiff(s) against you.