

Court File No.: 11-51657

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

JOANNE ST. LEWIS

Plaintiff

- and -

DENIS RANCOURT

Defendant

REFUSALS AND UNDERTAKINGS CHART (CLAUDE LAMONTAGNE)

REFUSALS					
Refusals to answer questions on the cross-examination of the Affidavit of Claude Lamontagne, sworn August 25, 2011.					
Cross-examination dated September 6, 2011.					
Issue & Relationship to pleadings or affidavit	Question No.	Page No.	Specific Question	Answer or precise basis for refusal	Disposition by the Court
1. Communications Exchanged with Denis Rancourt	25-30, 38-45	8, 12-13	Produce copies of exchanges with Mr. Rancourt – drafts of the affidavit, emails, notes, documents		

UNDERTAKINGS					
Outstanding undertakings given on the cross-examination of the Affidavit of Claude Lamontagne, sworn August 25, 2011.					
Cross-examination dated September 6, 2011.					
Issue & Relationship to pleadings or affidavit	Question No.	Page No.	Specific Undertaking	Date Answered or Precise Reason for not doing so	Disposition by the Court
1. Dictionaries consulted for "racist communication", paragraph 8 of the Affidavit of Claude Lamontagne	56, 66	15, 18	Undertaking to confirm what dictionaries Dr. Lamontagne looked at and provide a copy of the entries he refers to in paragraph 8 of his affidavit.		
2. Independence of Claude Lamontagne as an expert witness	107	29	Undertaking to provide the names of the people on the Committee For The Defence of Education from the beginning.		

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Joanne St. Lewis

- and -
Plaintiff

Denis Rancourt

Defendant

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PROCEEDING COMMENCED AT
OTTAWA

REFUSALS AND UNDERTAKINGS CHART

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