

Exhibit to Affidavit APPLICATION
to take leave to Appeal

PART ONE:

- i. discovery of 'harm from an adoption' as 'continuous injury' resulting from a pre-adoption report that was fabricated and intended to mislead.
- ii. 'Discovery' during the course of this lawsuit that the Social worker who fabricated the pre-adoption report or who was responsible for its presentation as such did provide to the Appellant (Plaintiff) not a copy of the original pre-adoption report but case notes that supposedly had been written in 1971 and 1972, but were obviously tampered with, marginal notes and stating certain matters that were untrue and intended to mislead by giving a false impression of the Appellant (Plaintiff).

THESE ACTS ARE CRIMINAL – therefore the question is does this party to the lawsuit have immunity and if so is the Attorney Generals for both Governments named responsible? * Mr. Brown counsel for the Crown (Saskatchewan Government Civil Law) told the Appellant (Plaintiff) in October, 2005, when he knew she planned to amend her claim *that the names of all parties had to be removed from her lawsuit as they had immunity*, which led to her simply directing this lawsuit to the Attorney Generals.

* If this advise (which she did not seek after) was intended to protect these public servants but undermined her ability to be successful with this lawsuit, *then Mr. Darryl Brown must be held responsible for misleading and whatever sections of the criminal code apply.*

PART TWO:

- i. THE INTEGRATED SEXUAL ABUSE TEAM – can liability exist for them individually and collectively when they report one another's findings, observations and opinions that can prove injurious to the protection of a child.
Example: The Protection Worker or Dr. E. Ivanochko (reg.psychologist), on contract to do a psychological assessment with Child & Youth Mental Health Services, or Constable Ferguson or anyone else on that team accessories to the libelous and injurious remarks documented in Dr. Leibel's medical report on Lance LeCaine.
- ii. Who is responsible for not securing evidence or destroying evidence or making false statements concerning photographs of the injuries on Charlene Dobson and Jonathan Dobson were taken, not once but twice with Charlene Dobson and now they do not exist? The photographs are documented in Dr. Norman's medical reports on them but now they no longer exist or never did exist.
- iii. Who is responsible for the breakdown in the medical examinations: Dr. Ruthnum coming late to the Regina General Hospital does not properly examine Charlene Dobson and then over 3 weeks later [after the Appellant (Plaintiff) reports her findings of the injuries on Charlene and Jonathan's bodies] do members of this team finally decide to examine the children.
- iv. Who is responsible for the gross negligence in not having the children seen within 48 hours of Appellant (Plaintiff) reporting these injuries? (as is the mandate and policy for Regina Children's Justice?)

Exhibit to Affidavit APPLICATION
to take leave to Appeal

- v. Excuses provided by Charlene Thurbide, Protection Worker are totally inexcusable – is she solely responsible?.
- vi. Who is responsible for ‘framing the Appellant (Plaintiff) and her husband in having the time-line for when the injuries occurred to them, ‘smack dab’ in the middle of these 3 weeks?
- vii. Who is responsible for telling the Crown Prosecutor(s) that there was nothing to the claims made by the grandmother and reported on the Fiat of Justice McIntyre?
- viii. Was their collusion amongst them to not have to deal with a ‘messy and difficult’ case.
- ix. Who is held responsible for the wrongful death of autumn Starr, the foster mother for sleeping her prone and not administering her Phenobarbital medication because she ran out of it, whereby she had a seizure ‘face down’ and suffocated? Is the Crown responsible for putting another baby with this foster mother who had a baby die before ours, and who died of inhalation of its vomit?
- x. Someone is responsible, either severly or collectively and Charlene Dobson and Arlene Lowery (nee Dobson) requests that this Honourable Court determines from the evidence before them, - just who is responsible?
- xi. Who is responsible for allowing 2 other younger siblings of Charlene and Jonathan be in the care of their mother when a No Contact Order existed from Justice Dickson (Feb./1998)?
- xii. when Charlene told the AUTHORITIES what happened to her and how her mommy hurt her and her brother,[there being corroborating physical evidence on both], who is responsible?
- xiii. Who is responsible for the abuse of the 2 younger children named here in this action, when they were placed with their mother?

PART THREE:

- i. Who was responsible for 2 unlawful evictions on the Appellant (Plaintiff) from her place of work- the police, the Crown, Joyce LaPrise or the Directors of the organization THE ANCHORAGE COUNSELLING & REHABILITATION SERVICES INC.
- ii. Who is responsible for an unlawful dismissal from her place of employment with no notice or severance pay?
- iii. Who is responsible for destroying all of the organizations records?
- iv. Who is responsible for taking / apprehending her chattels and computer, library of books and teaching resources and shredding even her graduation photograph from the University of Saskatchewan? T
The later re: picture and shredding of files was witnessed by Dora Wesaquate to be Joyce LaPrise.