

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

**KRP ENTERPRISES INC. and
1643078 ONTARIO INC.**

Plaintiffs

- and -

**THE CORPORATION OF HALDIMAND COUNTY,
ONTARIO PROVINCIAL POLICE COMMISSIONER GWEN M. BONIFACE,
and ONTARIO PROVINCIAL POLICE INSPECTOR BRIAN HAGGITH**

Defendants

Proceeding under the *Class Proceedings Act, 1992*

**FACTUM OF THE PLAINTIFF
(RESPONDING PARTY)
[Haldimand County Rule 20 Motion]**

FINDLAY McCARTHY LLP
66 James Street North
Hamilton, Ontario
L8R 2K5

John W. Findlay
LSUC No. 19502C

Tel: 905-526-8943
Fax: 905-526-8696
Eml: findlay@findlaymccarthy.com

Counsel for the Plaintiffs

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

**KRP ENTERPRISES INC. and
1643078 ONTARIO INC.**

Plaintiffs

- and -

**THE CORPORATION OF HALDIMAND COUNTY,
ONTARIO PROVINCIAL POLICE COMMISSIONER GWEN M. BONIFACE
and ONTARIO PROVINCIAL POLICE INSPECTOR BRIAN HAGGITH**

Defendants

Proceeding under the *Class Proceedings Act, 1992*

**FACTUM OF THE PLAINTIFF
(RESPONDING PARTY)
[Haldimand County Rule 20 Motion]**

1. **CHRONOLOGY**

(Paragraph of draft Amended Statement of Claim in parenthesis)

- 28 Jan 2004 Haldimand County enters into Police Service Agreement with Province (19)
- 28 Feb 2006 Protestors occupy the Douglas Creek Estates (28)
- 3 Mar 2006 Henco Industries Limited brings Application in Superior Court (31)
- 3 Mar 2006 Order of Justice B. Matheson provides interim injunction (32)
- 9 Mar 2006 Order of Justice T. Marshall makes injunction permanent (33)
- 17 Mar 2006 Order of Justice T. Marshall issuing Warrants for contempt (34)
- 28 Mar 2006 Order of Justice T. Marshall making findings of contempt (35)