

NOTICE OF LIBEL

TO: Paul Ledroit
Ledroit Beckett
Litigation Lawyers
630 Richmond Street
London ON N6A 3G6

AND TO: Ledroit Beckett
Litigation Lawyers
630 Richmond Street
London ON N6A 3G6

AND TO: Adrien St. Louis

BISHOP EUGENE PHILIP LaROCQUE (hereinafter "Bishop LaRocque")
HEREBY GIVES YOU NOTICE pursuant to Section 5 of the *Libel and Slander Act*,
R.S.O. 1990, c. L-12, that he was slandered and libelled by a series of your public
statements of and concerning him. Those statements were made by you to various
media representatives from June 7, 2005 to July 12, 2005. You made these statements
knowing and intending they would be published and republished at least by print media
throughout the province of Ontario. Therefore, you expressly or impliedly authorized,
encouraged and permitted the publication and republication of your statements by the
media which did in fact occur between June 7, 2005 and July 13, 2005.

All of your public statements were, in their natural and ordinary meaning, and
having regard to the innuendo contained therein and their tone and context, false and
defamatory of Bishop LaRocque both personally and in respect of his calling. You made
the statements maliciously.

Specifically, Bishop LaRocque complains of the following words published by you
as are contained in various media reports and elsewhere, all as described in this Notice:

1. During the week of June 6, 2004 John Swales, an employee or representative of the Ledroit Beckett firm contacted various media outlets in or around the City of Cornwall and in the Province of Ontario to schedule a press conference on behalf of Paul Ledroit and Ledroit Beckett for June 8, 2005. The purpose of the press conference was to make various announcements concerning sexual abuse perpetrated in or around the City of Cornwall and the commencement of certain lawsuits arising therefrom. The press conference was designed to draw maximum public attention to the statements which would be made at it.

2. Mr. Swales, on behalf of Paul Ledroit and/or Ledroit Beckett said that during the upcoming press conference "they would drop a bombshell on Cornwall". In this regard he intended to sensationalize what was going to take place at the press conference, all with a view to promoting the greatest possible media and corresponding public attention to the press conference. Mr. Swales' words to this effect were republished and reported in the June 8, 2005 Ottawa Sun at page 22 under an article entitled "**10 New Cornwall Abuse Suits Launched**" and the Cornwall Standard Freeholder on June 8, 2005 under the heading "**Project Trust bombshell?: Law firm officials promise unveiling of big names in today's suit announcement.**"

3. On June 8, 2005 a press conference was held by Paul Ledroit and Ledroit Beckett. Mr. Paul Ledroit chaired the press conference and acted as the media spokesperson and fielded media questions. At the press conference Mr. Ledroit announced the commencement of a large number of lawsuits against area officials, including members of the Diocese of Alexandria-Cornwall. On the front page of the June 9, 2005 edition of the Standard-Freeholder in Cornwall, under the heading "**Project Truth erupts: ten civil suits filed**", Mr. Ledroit was quoted as having said: "Ledroit also announced eleven other civil suits, including one yet to be filed which will name retired Alexandria-Cornwall Bishop Eugene LaRocque and the Vatican as defendants".

4. The June 9, 2005 edition of the Ottawa Sun reported at page 10 under the heading "**Victims launch 13 lawsuits: judge has distant relations among plaintiffs**

seeking \$3.1 million", that Mr. Ledroit made the following statement at the press conference:

London lawyer Paul Ledroit, the lawyer for all 13 cases, said that his client, Adrien St. Louis, would sue retired Bishop Eugene LaRocque.

St. Louis claims LaRocque and two other priests abused him in the 1970s when he was about 15. Ledroit said he would try to sue the Vatican because it ultimately is responsible for appointing bishops.

5. At page 3 of the June 9, 2005 edition of the Cornwall Standard-Freeholder, under the heading "Lawyer: Landmark suit to be filed against the Vatican: London area lawyer says those at the top need to accept some responsibility", Mr. Ledroit was quoted as saying the following at the June 8, 2005 press conference and in doing so was, having regard to other statements and all of the circumstances identifying Bishop LaRocque:

Attorney Paul Ledroit said Wednesday a statement of claim soon to be filed against a retired senior clergy member who served in Cornwall for many years will also name the Vatican as a defendant.

Ledroit said that there is a ladder of responsibility regarding sexual abuse and the church's Rome based headquarters is at the top.

6. Mr. Ledroit's statements were made on his own behalf, on behalf of the law firm of Ledroit Beckett and on behalf of Ledroit Beckett's client, Adrien St. Louis who expressly authorized and permitted Mr. Ledroit to make the statements aforesaid.

7. Bishop LaRocque states that the words spoken by Mr. Ledroit at the press conference and as reported in the articles as aforesaid meant and were understood to mean that Bishop LaRocque was a pedophile, that he was a pedophile in a position of influence over children, that he committed acts of sexual abuse against minor children and in particular against Adrien St. Louis and/or that Bishop LaRocque was immoral, untrustworthy and accordingly acted inconsistently with his duties and calling.

8. In the June 30, 2005 Cornwall Standard-Freeholder, at page 2 under the heading "**London law firm holds meeting next week on inquiry**", Paul Ledroit and John Swales on behalf of Paul Ledroit and Ledroit Beckett announced a public meeting would be held on July 4, 2005 in Cornwall allegedly to give sexual abuse victims and

"concerned citizens" a chance to address any issues and concerns they might have in the ongoing inquiry [public inquiry].

9. The meeting, which in fact took place on July 4, 2005, and its announcement were used as an opportunity to bolster publicity about claims and allegations being asserted by Mr. Ledroit and Ledroit Beckett on behalf of various alleged sexual abuse victims against the Diocese and others, including Bishop LaRocque, to recruit additional plaintiffs to commence proceedings against the Diocese or others and to sensationalize and promote the publication and republication of that information.

10. Bishop LaRocque states that at the July 4, 2005 public meeting Paul Ledroit, John Swales on behalf of Paul Ledroit or Ledroit Beckett, Adrien St. Louis or Paul Ledroit on Adrien St. Louis' behalf alleged that Bishop LaRocque was guilty of sexual assault or sexual abuse of Adrien St. Louis. Accordingly Bishop LaRocque states that the words uttered at this meeting by Paul Ledroit, John Swales on behalf of Paul Ledroit or Ledroit Beckett, Adrien St. Louis or Paul Ledroit on behalf of Adrien St. Louis were intended to mean, meant or were understood to have the meanings attributed to them in paragraph 8 of this Notice of Libel.

11. During the week of July 3, 2004 Paul Ledroit, John Swales on behalf of Paul Ledroit or Ledroit Beckett, Adrien St. Louis or Paul Ledroit on behalf Adrien St. Louis' contacted numerous media outlets in Cornwall and Ontario to announce that another press conference would take place on Tuesday July 5, 2005 in Cornwall to announce new lawsuits and to deal with further allegations of sexual abuse. This announcement was reported in the Canadian Press on Sunday July 3, 2005 in its National General News section, the Brockville Recorder and Times on July 4, 2005 at page A5, the London Free Press on July 4, 2005 at page C1, and the Windsor Star on July 4, 2005 at page A1. The purpose of the communication was to draw maximum public attention to the public statements that the recipients of this Notice of Libel intended to utter.

12. On July 3, 2005 Paul Ledroit spoke to representatives of the Windsor Star newspaper. He made a number of statements described in this paragraph to a reporter of the Windsor Star. The Windsor Star republished Mr. Ledroit's statements the next

day, July 4, 2005, in an article entitled "RC Church accused of negligence: sex abuse suit names Vatican, priest, retired Windsor Bishop". The article appeared at page A1. Paul Ledroit made the following statements to the Windsor Star, knowing and intending that they would be published, which they were, in fact:

Paul Ledroit, a London-based lawyer, said his firm will file a suit today in Cornwall against LaRocque and deceased priest Donald Scott on behalf of his client Adrien St. Louis.

The suit will allege Scott and to a lesser extent, LaRocque, abused St. Louis in the late 1970s when LaRocque was Bishop of the Alexandria-Cornwall Diocese.

"It occurred when this boy was an altar boy and would come to the rectory and sometimes stay overnight at the rectory" said Ledroit Sunday.

13. The statements described in paragraph 12 were uttered by Paul Ledroit, on behalf of Ledroit Beckett and Adrien St. Louis.

14. Bishop LaRocque states that the statements of Paul Ledroit meant and were understood to have the meaning referred to in paragraph 8 of this Notice of Libel.

15. On July 4, 2005 Paul Ledroit made a series of public statements on behalf of Ledroit Beckett and Adrien St. Louis. Mr. Ledroit's statements were reported by the Cornwall Standard-Freeholder on July 5, 2005 at pages 1 and 2. These statements were:

A civil suit filed Monday is a "social crusade" against widespread sex abuse perpetrated by the Catholic Church says a London-based lawyer: Paul Ledroit of the Ledroit Beckett firm.

The suit accuses the church of negligence and liability of their employees. Former local Bishop Eugene LaRocque and the late Donald Scott, a former Maxville priest, are named as defendants:

"Adrien was working and helping the church, he was dedicating his life to the church and enamoured by the institution" Ledroit said.

St. Louis, he said, did various tasks for the clergy over a number of years. This required him to "sleep over in the rectory" of the Maxville parish, Ledroit said. "The abuse began when he was 17 in 1974", Ledroit said,

and lasted for 4 years until he was 22. Ledroit said St. Louis relented to the abuse because of the "power difference" between him and the clergy.

"You followed orders from the church".

The alleged abuse, Ledroit said, is just one example of sex abuse practiced by Catholic clergy and the church's failure to eliminate it.

16. Bishop LaRocque states that the words uttered by Paul Ledroit on his own behalf, on behalf of his client Adrien St. Louis and on behalf of Ledroit Beckett, meant and were understood to have the meanings referred to in paragraph 8 of this Libel Notice.

17. On July 5, 2005 Mr. Ledroit held the press conference he had announced. He chaired the press conference and at it he presented his client Adrien St. Louis to the media. At the press conference Adrien St. Louis stated the following, which was published and republished by the Cornwall Standard-Freeholder on July 6, 2005 on its front page under the heading **"He knows who I am: plaintiff in sex abuse lawsuit refutes Bishop's claim of innocence"**:

Under a picture of himself standing next to Father Scott Mr. St. Louis said "when I had access to Father Scott's car, I would be picking up parcels from one diocese (office) to the other", said St. Louis while illustrating how he and Bishop LaRocque knew one another. "I am from the area; I have been in and out of his office."

Adrien St. Louis spoke to reporters at a press conference Tuesday morning and chuckled softly when one reporter implied LaRocque, the former Bishop for the Alexandria-Cornwall Roman Catholic Diocese now living in Windsor, had no memory of him. "He knows who I am", said St. Louis. "I have a very good idea he knows who I am".

On Tuesday, the Windsor Star reported that LaRocque denied the allegations against him, and made no mention as to whether or not he knows St. Louis.

While he was allegedly being routinely abused by Scott, St. Louis said, he recalls two separate occasions when he says he was allegedly abused by the Bishop at the rectory of St. James Parish in Maxville. "I was pretty much living there", said St. Louis who explained he would do work around the rectory which included running errands for the Diocese. "He and (LaRocque) came into my room while I was sleeping".

St. Louis said the abuse involved fondling and masturbation. "I didn't touch him", he said. "He touched me, but I didn't touch him at all. He didn't talk to me. I just knew who he was."

There wasn't a lot he could do to stop it from happening.

"I was shocked and afraid and scared" he said, making reference to LaRocque's height and girth. "Who's going to say no to a guy who's 7' tall and weighs 300 pounds"? St. Louis said LaRocque abused him on at least one other occasion, and the abuse at the hands of Scott lasted "about three and a half to four years".

18. These statements uttered by Adrien St. Louis were made at the press conference orchestrated and chaired by Paul Ledroit. Paul Ledroit knew that his client was going to utter the words aforesaid and intended that he would publish those words and that they would be republished by local and Ontario media. Paul Ledroit and Ledroit Beckett encouraged, advised and facilitated their client to utter the words aforesaid. Accordingly Paul Ledroit and Ledroit Beckett are responsible for the words spoken by Adrien St. Louis and published and republished by the media.

19. Bishop LaRocque states that the words aforesaid intended, meant and were understood to have the meanings referred to in paragraph 8 of this Libel Notice and that Bishop LaRocque is a liar and has deliberately lied in refusing to acknowledge the existence of his knowledge of Adrien St. Louis, that Bishop LaRocque deliberately misused Diocesan business affairs and employees to facilitate sexual abuse, that Bishop LaRocque used his height and weight to intimidate, bully and facilitate sexual abuse.

20. On July 12, 2005 John Swales as an employee or agent of Paul Ledroit or Ledroit Beckett gave an interview to the Glengarry News and in doing so expressly or impliedly authorized the publication or republication of the Glengarry News of the words which he uttered or spoke. On Wednesday July 13, 2005 at page A2 the Glengarry News published and republished John Swales' words in context of allegations that Adrien St. Louis had launched a lawsuit for sexual abuse against Bishop LaRocque:

John Swales of the firm of Ledroit Beckett, who serves as a client support worker for victims of sexual abuse, says that Mr. St. Louis' compromised

faith in religious life is one of the most dire effects of the alleged abuse. "He finally came to realize how this ruined his life", says Mr. Swales, explaining why the firm's client waited so long to make the charges. Mr. Swales spoke to the news on Mr. St. Louis' behalf because he says the man is in too fragile a state of mind to give an interview since going public with the lawsuit.

21. Bishop LaRocque states that the words published by John Swales were intended, meant and understood to have the meanings referred to in paragraph 8 of this Notice of Libel and that they republished and repeated by innuendo all of the allegations previously published by Paul Ledroit, Paul Ledroit on behalf of Ledroit Beckett, John Swales on behalf of Paul Ledroit or Ledroit Beckett, Adrien St. Louis or Paul Ledroit on Adrien St. Louis' behalf and that Bishop LaRocque as a pedophile and person who had committed sexual assault had "ruined Adrien St. Louis' life and had caused or contributed to all of the damage he has suffered".

22. Bishop LaRocque states that in all of the publications aforesaid, statements of Paul Ledroit, Paul Ledroit on behalf of Ledroit Beckett, John Swales on behalf of Paul Ledroit or Ledroit Beckett, Adrien St. Louis or Paul Ledroit on Adrien St. Louis' behalf were actuated by malice having regard to the following circumstances:

- (a) In 2004 Mr. Ledroit and Ledroit Beckett hired or contracted with John Swales. The purpose of the arrangement was to solicit would-be-plaintiffs against the Diocese of Alexandria-Cornwall or people employed by it. In order to support this plan Mr. Swales on Mr. Ledroit and Ledroit Beckett's behalf engaged in a media campaign to draw attention to his efforts and to solicit plaintiffs to advance litigation. This was in Ledroit Beckett and Paul Ledroit's financial interest.
- (b) Mr. Swales, on Ledroit Beckett or Paul Ledroit's behalf placed advertisements in Cornwall media announcing his presence and meetings that he would be conducting for the purposes aforesaid. These meetings were used to promote allegations against the Diocese of Alexandria-Cornwall and among others, Bishop LaRocque.

- (c) Therefore, early on the recipients of this Notice devised a plan to use the media to promote their own and their clients' financial interests.
- (d) The press conferences and public statements aforesaid are part of the same plan and were used and timed in order to obtain maximum public exposure to the allegations aforesaid, thereby causing the greatest damage and prejudice to Bishop LaRocque and others.
- (e) The press conferences and public statements were made with reckless disregard to the reputation and interest of Bishop LaRocque.

23. The statements aforesaid have caused Bishop LaRocque to suffer damage and have brought him into public odium, scandal and contempt.

24. Bishop LaRocque demands that the recipients of this Notice publicly apologize.

July 19, 2005

BORDEN LADNER GERVAIS LLP

Barristers and Solicitors
1100 – 100 Queen Street
Ottawa, ON K1P 1J9

David Sherriff-Scott
(LSUC #316821)
(613) 237-5160 telephone
(613) 230-8842 facsimile