

COURT FILE NO. 2001-14300

COURT COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

APPLICANTS REBECCA MARIE INGRAM, HEIGHTS BAPTIST CHURCH, NORTHSIDE BAPTIST CHURCH, ERIN BLACKLAWS and TORRY TANNER

RESPONDENTS HER MAJESTY THE QUEEN IN RIGHT OF THE PROVINCE OF ALBERTA and THE CHIEF MEDICAL OFFICER OF HEALTH

DOCUMENT **AFFIDAVIT OF LESLEY DOUCET**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT Rath & Company
Barristers and Solicitors
282050 Highway 22 W
Foothills, AB, T0L 1W2
Attention: Jeffrey R. W. Rath
Telephone: 403-931-4047
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Counsel for Rebecca Marie Ingram

Affirmed on August, 10, 2022

I, Lesley Doucet, of Cold Lake, Alberta MAKE OATH AND SAY THAT:

1. I have personal knowledge of the facts hereinafter deposed to save and except where stated to be based upon information and belief, and were so stated, I verily believe them to be true.
2. I watched the press conference of Dr. Deena Hinshaw, Chief Medical Officer of Health in and for the Province of Alberta ("Dr. Hinshaw") dated November 9, 2021, entitled "Update on COVID-19" ("**Press Conference**").
3. I watched the Press Conference on the "Your Alberta" YouTube account ("**Video**"). Here is the link for the YouTube video of the Press Conference: [Update on COVID-19 – November 9, 2021 - YouTube](#)

4. At 18:19 of the Video, Dr. Hinshaw is asked a question by a Global News reporter, Sarah Komadina ("Question").
5. The Question was asked following Dr. Hinshaw's announcement at the Press Conference that further restrictions were coming to Albertans, particularly, as of November 12, 2021, Albertans will be required to have proof of vaccination with two doses, not one, under the Restrictions Exemption Program.
6. This is an accurate transcription of the Question and Dr. Hinshaw's response:
 - a. **Sarah Komadina:** "I wanted to ask, you mentioned that the vaccine, we haven't seen a vaccine uptake -- and that has been contributing to seeing lower case numbers, I'm wondering -- with our vaccine status if we are seeing people that were hesitant prior, now taking an opportunity for the vaccine."
 - b. **Dr. Hinshaw:** "Since we moved forward with the additional encouragement, again that kind of structural encouragement of the Restriction Exemption Program, we have seen a number of Albertans who previously didn't have first or second doses step forward to take advantage of the protection that vaccine offers, not just for them, but for those around them. Again, the specific numbers of how many Albertans have stepped forward to take first and second doses in the last couple of months we could provide offline. But we have seen an increase over the last couple of months and of course, as our vaccine coverage increases that helps with protection for those individuals and for the people they interact with."
7. I make this Affidavit in support of an Order for the cross-examination of Dr. Deena Hinshaw, the Chief Medical Officer of Health for the Province of Alberta, on the Documents and matters arising therefrom and in support of an Order that Dr. Deena Hinshaw answer questions related to issues arising from the Documents that were objected to by Counsel for the Respondents on the basis of Cabinet Confidentiality.

AFFIRMED BEFORE ME at
Cold Lake, Alberta, this 10th day of
August, 2022.

(Commissioner for Oaths in and for the
Province of Alberta)



LESLEY DOUCET

Megan Gurski
Commissioner for Oaths in and
for the Province of Alberta
Expires: June 18, 2023