

FORM 92 (RULE 26 (1) )

No. S014921  
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

BETWEEN:

UNITED FOOD AND COMMERCIAL  
WORKERS INTERNATIONAL UNION

PLAINTIFF

AND:

HUGH JOHN FINNAMORE and  
WORKPLACE STRATEGIES INC.

DEFENDANTS

**DEMAND FOR DISCOVERY OF DOCUMENTS**

TAKE NOTICE that the Defendants demand that you make discovery of all documents which are or have been in your possession or control relating to any matter in question in this action within 21 days from the delivery of this demand.

In particular, the Defendants demand the following documents and records created on or after January 1, 1985 and the date of delivery of this Demand For Discovery Of Documents whether they be printed on paper or stored electronic or on magnetic media:

1. All documents and records, including names and addresses of recipients, pertaining to the distribution of the Plaintiff's Statement of Claim and Writ of Summons filed with the Supreme Court of British Columbia on August 31, 2001.
2. All documents and records pertaining to the merger between the Textile Processors, Service Trades, Health Care, Professional and Technical Employees International Union, Local 351 and the United Food and Commercial Workers International Union and or any affiliate of the United Food and Commercial Workers International Union.
3. All documents and records pertaining to the merger or attempted merger between the Textile Processors, Service Trades, Health Care, Professional and Technical Employees International Union and the United Food and Commercial Workers International Union and or any affiliate of the United Food and Commercial Workers International Union.
4. All documents and records pertaining to the merger or between the Canadian Union of Restaurant and Related Employees Union and the United Food and Commercial

Workers International Union and or any affiliate of the United Food and Commercial Workers International Union.

5. All documents and records related to compensation and benefits including pensions granted to or maintained for employees and officers of all unions that have merged with the United Food and Commercial Workers International Union and or any affiliate of the United Food and Commercial Workers International Union.
6. All documents and records related to a dispute between UFCW Locals 206 and 1000a with respect to bargaining rights for Cara Operations Air Terminal Restaurants, Pearson Airport.
7. All documents and records related to all officials of "merged" unions currently in receipt of pension and other benefits through the UFCW and the details of those benefits.
8. All documents and records related to the repayment of a loan to former Textile Processors, Service Trades, Health Care, Professional and Technical Employees International Union, Local 351 President Thomas Corrigan by Former UFCW International Union Vice-president Clifford R. Evans and David N. Harvey, President of Benefit Plan Administrators Limited on behalf of Teamsters Local 938 President Ray Bartolotti et al.
9. All documents and records related to business relationships between the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union and/or any entities controlled directly or indirectly by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union and Benefit Plan Administrators Limited.
10. All documents and records related to business relationships between the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union and/or any entities controlled directly or indirectly by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union and Prestige Plan Administrators.
11. All documents and records, in their entirety, related directly or indirectly to the purchase and sale of 34 Madison Avenue, in the City of Toronto.
12. All documents and records related a financial and business relationship between I.F. Propco Holdings (Ontario) 49 Ltd. and MGI Packers of Kitchener, Ontario.
13. All documents and records related a financial and business relationship between I.F. Propco Holdings (Ontario) 49 Ltd. and AFM Hospitality Corporation.
14. All documents and records related to compensation, benefits and disbursements made by AFM Hospitality Corporation to UFCW Local 175 President and former Secretary Treasurer Wayne Hanley.
15. All documents and records relating to all financial and business dealings between any and all numbered entities which include the name "I.F. Propco" in their registered name and Kelloryn Holdings Inc. and and all entities with the name Kelloryn Hotels Inc. in their names and dealings with RHK Capital and/or Ronald Kelly.

16. All documents and records related to all numbered entities which include the name "I.F. Propco" in their registered name and the entities with which they do business.
17. All documents and records related to any North American corporate entities for which UFCW officials and Clifford R. Evans are officers, board members, directors, chairs.
18. All documents related to a Washington, DC meeting between UFCW International President Douglas Dority, Former International Vice-president Clifford Evans and representatives of Cara Operations Limited on or about April 22, 1985.
19. All documents related to and specifically including the "Partnering Agreement" dated and signed on or about August 15, 1997 between Provigo Inc. carrying on business as Maxi and/or Maxi & Co. and the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union.
20. All documents related to any and all voluntary recognition agreements between Canadian employers and the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union.
21. All documents related to voluntary recognition agreements between Serca Foods and/or Sobeys and or the Empire Group and the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union.
22. All documents and records related to expenditures of funds for the purposes of defending the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union from raids by competing unions in Canada.
23. All records relating to discussions held between UFCW International President Douglas Dority and Former International Vice-president Clifford Evans and representatives of Cara Operations and Hotel Employees Restaurant Employees International Union on or about the months March, April and May 1985.
24. All documents and records relating to the employment of Hugh John Finnamore by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union.
25. All documents and records concerning consultant Bill Reno as they relate to communications work or consulting regarding information about Hugh John Finnamore. In particular documents relating to information concerning the employment of Hugh John Finnamore spoken to Mr. Terence Corcoran, Editor in Chief of the Financial Post Newspaper on or about May 22, 2001 by Bill Reno.
26. All documents and records pertaining to information given to UFCW/TUAC Local 501 and any other person or entity regarding Hugh John Finnamore by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union.
27. All documents and records pertaining to discussions between the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union and Maple Leaf Foods prior to the signing of a voluntary recognition between Maple Leaf Foods and the United Food and Commercial Workers International Union Local 832.

28. All documents and records pertaining to the employment by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union of any person related by blood or marriage to any official, officer, executive or employees, either past or present, of the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union.
29. All documents and records pertaining to the creation of the United Food and Commercial Workers International Union Local 351 and in particular, all documents relating to the recruitment and appointment and/or election of Ralph Ortleib as President.
30. All documents and records pertaining to the creation of the United Food and Commercial Workers International Union Local 777 and in particular, all documents relating to the recruitment and appointment and/or election of Gilbert Whitlock as President.
31. All documents and records pertaining to investments made in WebGalaxy Inc. and/or United Labour Online by any and all pension funds controlled by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union.
32. All documents and records pertaining to any and all business relationships between Affinity Telesystems Inc. of Canada, USA Affinity Telesystems, John S. Irvine and the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union.
33. All documents and records pertaining to all business transactions between Andora Holdings Ltd., a Bahamian corporation whose address is c/o Lennox Paton, Devonshire House, Queen Street, Nassau, Bahamas and the Canadian Commercial Workers' Industry Pension Plan and/or the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union.
34. All documents and records pertaining to the purchase of a Gulfstream II aircraft, including documents showing the seller's asking price and the actual purchase price, bought on or about April 21, 1986 and sold on or about June 7, 1994.
35. All documents and records pertaining to the rental of residential suites paid for by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union in the Washington DC area or the Greater Toronto Area and in particular suites #212 and #323 at 1234 Massachusetts Avenue, Washington DC.
36. All document and records pertaining to the on or about 1986 purchase and sale sometime later of a residential property in McLean Virginia by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union.
37. All document and records pertaining to the on or about the purchase from and sale to William Wynn of a residential property in Alexandria Virginia by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union.

38. All documentation and records pertaining to funds transferred from All document and records pertaining to the on or about 1986 purchase and sale sometime later of a residential property in McLean Virginia by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union for the personal benefit of William Wynn.
39. All documentation and records pertaining to retirement “gifts” given to Clifford R. Evans upon his departure as UFCW Canadian Director. In particular, documents relating to the purchase and renovation of a residence in the state of Florida and a motorized golf cart and trailer purchased by All document and records pertaining to the on or about 1986 purchase and sale sometime later of a residential property in McLean Virginia by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union.
40. All documentation and records pertaining to all “tribute” dinners paid for and arranged by All document and records pertaining to the on or about 1986 purchase and sale sometime later of a residential property in McLean Virginia by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union. In particular all documentation relating to a May 23, 1992 dinner sponsored by employers and All document and records pertaining to the on or about 1986 purchase and sale sometime later of a residential property in McLean Virginia by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union.
41. All documentation and records, including the original ballots, pertaining to all aspects of the dispute regarding a 1999 election of officers at United Food and Commercial Workers International Union Local 1518.
42. All documentation and records, including the original ballots, pertaining to all aspects of the dispute regarding a 1999 election of officers at United Food and Commercial Workers International Union Local 777.
43. All documentation and records, including the original ballots, pertaining to all aspects of a 1995 election of officers at United Food and Commercial Workers International Union Local 777.
44. All documentation and records, including the original ballots, pertaining to all aspects of a 2001 vote regarding a merger of local unions held by United Food and Commercial Workers International Union Local 777.
45. All documentation and records, including the original ballots, pertaining to all aspects of a 2001 vote regarding a merger of local unions held by United Food and Commercial Workers International Union Local 2000.
46. All documentation and records pertaining to the All documentation and records, including the original ballots, pertaining to all aspects of a 2001 vote regarding a merger of local unions held by United Food and Commercial Workers International Union Local 777.
47. All documents and records relating to the ownership, control and creation of the Internet site [www.walmartyrs.com](http://www.walmartyrs.com) and all such sites with “walmartyrs” in their domain names.
48. Cheque registries and balance sheets and audited financial statements for the years 1992 through 2000 pertaining to all Canadian education and training funds controlled

directly or indirectly by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union.

49. All documents and records relating to applications for and receipt of education and training funds from all government sources, but in particular Human Resources Development Canada.
50. All documents and records related to the Canadian real estate holdings, either directly or indirectly held by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union and/or entities controlled by them.
51. All documents and records related to educational course offerings related to education and training funds or similar funds controlled directly or indirectly by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union, including dates on which they were held and attendance records relating to those offerings.
52. All documents and records relating to Settlement Agreements and/or Release Agreements concerning lawsuits involving the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union and/or any entity controlled either directly or indirectly by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union.
53. All documents and records relating to the real estate holdings under the direct or indirect control of Clifford R. Evans, Investment Committee Chair of the Canadian Commercial Workers Industry Pension Plan, including personal holdings whether they be held directly, indirectly or in trust.
54. All documents and records relating to the real estate holdings under the direct or indirect control of the Canadian Commercial Workers Industry Pension Plan.
55. All documents and records pertaining to enterprises, companies and proprietorships owned and/or operated, either directly or indirectly by past and present employees, officers and executives of the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union and/or any entity controlled either directly or indirectly by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union.
56. All documents and records relating to involvement of the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union and/or entities controlled by them, its employees, officials or agents in the attempted disaffiliation of Hotel Employees and Restaurant Employees International Union Local 75 from HERE International during the period 1992 to 1995.
57. All documents and records concerning the relationship between the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union and former Hotel Employees and Restaurant Employees International Union Local 75 President Jean Guy Belanger.
58. All documents and records related to the tenancy or provision of office space in 1994 and 1995 to former executive board officials and employees of Hotel Employees and Restaurant Employees International Union Local 75 at the offices of the United Food

and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union at 61 International Blvd., Rexdale, Ontario.

59. All documents and records relating to the hiring by the United Food and Commercial Workers International Union and/or any affiliate of the United Food and Commercial Workers International Union of former officials of Hotel Employees and Restaurant Employees International Union Local 75.

Dated at Vancouver, British Columbia, this 12th day of September 2001.

Per: \_\_\_\_\_  
*Hugh John Finnamore, Defendant*

TO: The Plaintiff

AND TO: Its Solicitor