



S217586

This is the 1st affidavit of
Rebecca Hill
in this case and was made on
10/JAN/2022

No. 217586
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN

ACTION4CANADA, KIMBERLY WOOLMAN, THE ESTATE OF JAQUELINE
WOOLMAN, LINDA MORKEN, GARY MORKEN, JANE DOE #1, BRIAN EDGAR,
AMY MURANETZ, JANE DOE #2, ILONA ZINK, FEDERICO FUOCO, FIRE
PRODUCTIONS LIMITED, F2 PRODUCTIONS INCORPORATED, VALERIE ANN
FOLEY, PASTOR RANDY BEATTY, MICHAEL MARTINZ, MAKHAN S.
PARHAR, NORTH DELTA REAL HOT YOGA LIMITED, MELISSA ANNE
NEUBAUER, JANE DOE #3

PLAINTIFFS

AND

HER MAJESTY THE QUEEN IN RIGHT BRITISH COLUMBIA, PRIME MINISTER
JUSTIN TRUDEAU, CHIEF PUBLIC HEALTH OFFICER THERESA TAM, DR.
BONNIE HENRY, PREMIER JOHN HORGAN, ADRIAN DIX, MINISTER OF
HEALTH, JENNIFER WHITESIDE, MINISTER OF EDUCATION, MABLE
ELMORE, PARLIAMENTARY SECRETARY FOR SENIORS SERVICES AND
LONG-TERM CARE, MIKE FARNWORTH, MINISTER OF PUBLIC SAFETY AND
SOLICITOR GENERAL, BRITISH COLUMBIA FERRY SERVICES INC.
(OPERATING AS BRITISH COLUMBIA FERRIES), OMAR ALGHABRA,
MINISTER OF TRANSPORT, VANCOUVER ISLAND HEALTH AUTHORITY, THE
ROYAL CANADIAN MOUNTED POLICE (RCMP), AND THE ATTORNEY
GENERAL OF CANADA, BRITTNEY SYLVESTER, PETER KWOK, PROVIDENCE
HEALTH CARE, CANADIAN BROADCASTING CORPORATION, TRANSLINK
(BRITISH COLUMBIA)

DEFENDANTS

AFFIDAVIT

I, Rebecca Hill, of 1301-865 Hornby Street, in the City of Vancouver, in the Province of
British Columbia, AFFIRM THAT:

1. I am a paralegal with the Ministry of Attorney General, Legal Services Branch,
and am assisting Mark Witten, counsel for the Defendants, Her Majesty the Queen in

Right of the Province of British Columbia, Dr. Bonnie Henry, Premier John Horgan, Adrian Dix (Minister of Health), Jennifer Whiteside (Minister of Education), and Mike Farnworth (Minister of Public Safety and Solicitor General, (collectively, the "Province"), in the above captioned proceedings. As such, I have personal knowledge of the matters deposed to except where such are stated to be based on information and belief, in which case, I verily believe them to be true.

Action4Canada Website Information

2. On November 30, 2021, I visited the website www.Action4Canada.com which I understand to be a website created and maintained by the Action4Canada, a Plaintiff in the above referenced proceeding (the "Action4Canada Site").

3. Attached and marked as **Exhibit "A"** is a true copy of a printout of the main page of the Action4Canada Site, obtained by me on November 30, 2021.

4. Attached and marked as **Exhibit "B"** is a true copy of a printout of the "Donate" page from the Action4Canada Site, obtained by me on November 30, 2021.

5. Attached and marked as **Exhibit "C"** is a true copy of a printout of the "The House of COVID keeps on Falling" page from the Action4Canada Site, obtained by me on November 30, 2021.

6. Attached and marked as **Exhibit "D"** is a true copy of a printout of the "Action4Canada: Statement of Claim FILED" page from the Action4Canada Site on November 30, 2021.

Notices of Liability

7. Attached and marked as **Exhibit "E"** is a true copy of a printout of the "Notices of Liability" page from the Action4Canada Site, obtained by me on November 30, 2021.

8. Attached and marked as **Exhibit "F"** is a true copy of the "Employer Vaccine Notice of Liability" page from the Action4Canda Site along with a copy of the blank

form and an instruction page for completion and service, obtained by me on November 30, 2021.

9. Attached and marked as **Exhibit "G"** is a true copy of the "Elected Officials Vaccine Notice of Liability" page from the Action4Canada Site along with a copy of the blank form and an instruction page for completion and service, obtained by me on November 30, 2021.

10. Between August and December 2021, our office was provided with copies of approximately seventy (70) Vaccine Notices of Liability to Employers in the template provided on the Action4Canada Site, which had been sent by employees to representatives of various BC government agencies and ministries. Attached and collectively marked as **Exhibit "H"** is a sample of twenty (20) completed Vaccine Notices of Liability to Employers and, where provided, accompanying emails.

11. Between August and December 2021, our office was provided with copies of approximately one hundred ten (110) Vaccine Notices of Liability to Elected/Appointed Officials in the template provided on the Action4Canada Site, which had been sent to representatives of various BC government agencies and ministries. Attached and collectively marked as **Exhibit "I"** is a sample of twenty (20) completed Vaccine Notices of Liability to Elected/Appointed Officials, and, where provided, accompanying emails.


12. Between August and December 2021, our office was provided with copies of approximately five (5) letters in a template provided on the Action4Canada Site, with the subject line "Threat to use an experimental injection as a term of employment." Attached and collectively marked as **Exhibit "J"** is a copy of those letters, and, where provided, accompanying emails.

Other Material

13. On November 30, 2021, I conducted an internet search using www.Google.com for a Twitter account related to the name "Rocco Galati". As a result of that search, I was able to access a Twitter account under the name @roccogalatilaw. Attached and marked as **Exhibit "K"** are true copies of screenshots taken by me of postings from the Twitter

account @roccogalatilaw on November 30, 2021 for the period August 10 – September 1, 2021.

AFFIRMED BEFORE ME)
at Vancouver, British Columbia)
on January 10, 2022.)
_____)
A commissioner for taking)
affidavits for British Columbia)



Rebecca Hill

MARK WITTEN
BARRISTER & SOLICITOR
MINISTRY OF JUSTICE
LEGAL SERVICES BRANCH
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