

Court File #: CV-22-0069-1880-0000

ONTARIO

SUPERIOR COURT OF JUSTICE

B E T W E E N:

DR. BYRAM BRIDLE

Plaintiffs

- and -

**UNIVERSITY OF GUELPH, JEFFREY WICHTEL, LAURIE ARNOTT,
CHARLOTTE YATES, SCOTT WEESE, GLEN PYLE, ANDREW PEREGRINE,
DOROTHEE BIENZLE, AMY GREER, DAVID FISMAN, NICK DULEY, JANE
OR JOHN DOE JUNIOR SCIENTIST**

Defendants

REPLY

1. The Plaintiff Dr. Byram Bridle Replies to the Defendants' Statement of Defence as set out below.
2. The Plaintiff Dr. Byram Bridle relies on the facts set out in his Statement of Claim, and, unless expressly admitted, denies the Defendants' assertions.
3. With respect to paragraph 2 of the Statement of Defence, and the John or Jane Doe junior scientist, the Plaintiff states that this statement draws the inescapable conclusion that the Defendants know the identity of this John or Jane Doe and request the Defendants provide his/her identity forthwith.
4. With respect to paragraph 13 of the Statement of Claim the Plaintiff states that if so, the lawyer on record for the Defendants is in a (potential) conflict of interest in representing Mr. Duley and furthermore, given that fact, gives reasonable inference that Mr. Duley colluded, as pleaded, with the other Co-Defendants.

5. The Plaintiff, with respect to paragraphs 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, contest those assertions.
6. In particular, with respect to paragraph 26, this bald assertion is contradicted by the Defendants' own assertion that anything ("physically") done outside the university campus, including online harassment, was not within the Universities jurisdiction, to remedy. The issues of the intentional torts are not a matter of a labour dispute as it deals with intentional tort and criminal activity against the Plaintiff, by the Defendants.
7. With respect to paragraph 27 the Plaintiff contests this assertion and further states that the "evidence" alleged, much of which is the Twitter tweets by the Defendants, are necessarily plead as statements in furtherance of the conspiracy.
8. The Plaintiff further contests the statements and assertions set out in paragraphs 28, 29, 30, 31, 32, 33, 34, 35 of the Statement of Defence.

Dated at Toronto this 8th day of March , 2023.



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Dr. BYRAM BRIDLE

-and-

Glen PYLE et al

Plaintiffs

Defendants

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PROCEEDING COMMENCED AT TORONTO

REPLY

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