

CANADA

**SUPERIOR COURT
(Civil Division)**

**PROVINCE OF QUEBEC
DISTRICT OF MONTREAL**

No.: 500-17-120468-221

KAHENTINETHA

KARENNATHA

KARAKWINE

KWETIIO

OTSITSATAKEN

and

KARONHIATE

Plaintiffs

v.

**SOCIÉTÉ QUÉBÉCOISE DES
INFRASTRUCTURES**

ROYAL VICTORIA HOSPITAL

MCGILL UNIVERSITY HEALTH CENTRE,

MCGILL UNIVERSITY,

VILLE DE MONTRÉAL,

and

ATTORNEY GENERAL OF CANADA,

Defendants

and

ATTORNEY GENERAL OF QUÉBEC

Impleaded Party

**WRITTEN EXAMINATION OF KAHENTINETHA ON A SWORN STATEMENT AT THE
PRE-TRIAL PHASE – MUHC (Section 105 C.c.p)**

I the undersigned, Kahentinetha, residing at Kahnawake, province of Quebec P.O. Box 991, J0L 1B0, give the following responses under oath to the written examination of the Defendant MUHC.

Question 1: Name the indigenous children who were allegedly admitted at the AMI between 1954 and 1963.

We know about Morningstar, mentioned in Lana Ponting's affidavit, as well as the Kahnawake children who had intelligence tests with the AMI. We also know about other kanien'keha:ka individuals whom I cannot mention because their families fear retaliation. This lawsuit is precisely to order the defendants to reveal which Indigenous children were admitted to the AMI, as only they have the archives and patient records, provided that they have not been purposefully destroyed.

2. Name the indigenous children who allegedly disappeared while being treated at the AMI between 1954 and 1963.

We know about Morningstar, mentioned in Lana Ponting's affidavit. This lawsuit is precisely to order the defendants to reveal which Indigenous children disappeared after being treated at the AMI, as only they have the archives and patient records, provided that they have not been purposefully destroyed.

AFFIDAVIT

I, the undersigned, Kahentinetha, domiciled and residing at Kahnawake, solemnly affirm the following:

All the answers that I have given in the above written examination are true and correct to the best of my knowledge.

SWORN BEFORE ME at Kahnawake, Quebec

And I have signed at Kahnawake,

this 18th day of September, 2022

this 18 day of September, 2022

Elizabeth Montour
COMMISSIONER OF OATHS

(Signature)
Kahentinetha

Commissaire à l'assermentation
Commissioner for Oaths
ELIZABETH MONTOUR 216757
For all Québec judicial district and
outside Québec Tous les districts
judiciaires du Québec et extérieur

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ORIGINAL