

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N :

ROBERT SEED

Plaintiff

- and -

**HER MAJESTY THE QUEEN
IN RIGHT OF THE PROVINCE OF ONTARIO**

Defendant

Proceeding under the *Class Proceedings Act, 1992*

REPLY

1. The plaintiff, Robert Seed (“Seed”) repeats and relies on the allegations in the Amended Statement of Claim.
2. Except as expressly pleaded herein, Seed denies all of the allegations in the Statement of Defence and puts the defendant, Her Majesty the Queen in Right of the Province of Ontario (the “Crown”), to strict proof thereof.
3. Seed denies that no complaints of abuse were reported. The Crown was aware of abuse at the W. Ross MacDonald School, formerly the Ontario School for the Blind (“Ross MacDonald”).
4. Further, to the extent abuse was not reported, which is denied, it was due to the failure of the Crown in the operation and management of Ross MacDonald. The Crown fostered or failed to prevent an environment at Ross MacDonald that was not conducive to reporting complaints of abuse by either students or staff.
5. There was a culture of secrecy at Ross MacDonald such that staff would not and did not report abuse involving other staff members. Staff were strongly discouraged from reporting incidents of abuse at Ross MacDonald.

6. In addition, those staff members who witnessed incidents of abuse or were aware of incidents of abuse were not provided with any training that would assist them in reporting these incidents.

September 10, 2012

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ROBERT SEED

and

**HER MAJESTY THE QUEEN IN RIGHT
OF THE PROVINCE OF ONTARIO**

Court File No: 11-420734

Plaintiff

Defendant

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at Toronto

Proceeding under the *Class Proceedings Act, 1992*

REPLY

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