

March 24, 2026

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**Private & Confidential**  
**Via Email**

Candice Grant  
Roberston Stromberg LLP  
Suite 600, 105 21st Street East  
Saskatoon, SK S7K 0B3

Dear Ms. Grant :

**RE: Dayan Goodenowe et al v CBC et al.**  
**Our File No.: 104576**

As you know, we are counsel to Dr. Dayan Goodenowe and Lakeview Regional Health Centre. I write in response to the enclosed email correspondence of your client, Mr. Leo, to Dr. Goodenowe, requesting responses to questions for what Mr. Leo characterizes as a forthcoming story concerning Dr. Goodenowe's "history in Saskatchewan".

We reiterate the requests of Dr. Goodenowe's former counsel that further correspondence to our clients from or on behalf of Mr. Leo or anyone else at CBC be directed to us, as legal counsel, and not our clients. Direct communications between the parties is inappropriate given the active litigation. Consistent with what we understand to be your specific authorization to our predecessors, we are copying Mr. Leo on this correspondence directly, to ensure he receives it in a timely manner.

In the publishing of at least nine stories about Dr. Goodenowe in the past nine months, Mr. Leo and CBC have demonstrated a pattern of reporting that consistently omits material context about Dr. Goodenowe's scientific work and professional history. We remain particularly concerned about Mr. Leo's willingness to rely and report on incomplete and inaccurate information.

Mr. Leo's latest questions reflect his apparent intention to publish a defamatory article that portrays Dr. Goodenowe as untrustworthy and of disreputable character on topics that go well beyond any matter of public interest. The apparent premise of this new story is the republication of gossip and innuendo concerning historical private business dealings. Dr. Goodenowe is a proud native of Saskatchewan and has strong links to the Moose Jaw and wider community and Mr. Leo appears set to impugn his conduct "in Saskatchewan" generally.

Take, for example, Mr. Leo's first question:

In my research, I have discovered that you have incurred a long series of debts and in some cases court judgements that you have

failed to honour. This appears to be a pattern of making promises that you don't keep in your financial dealings. How do you respond to that?

The false premise of this question is a negative view of Dr. Goodenowe's personal character and honesty in his private dealings. It falsely equates alleged unspecified debts and judgments with bad character and provides zero specific information to which Dr. Goodenowe could respond. This meaning is defamatory and does not reflect a genuine intention to obtain information from Dr. Goodenowe or provide him with a meaningful opportunity to respond.

Further, the wide-ranging nature of the questions, including those about Phenomenome Discoveries Inc. ("PDI"), reflect that Mr. Leo lacks a basic understanding of some of the issues about which he intends to write.

Given the lack of specificity as to the questions posed, at this time I can only offer the following brief comments on behalf of Dr. Goodenowe in response to some of the issues Mr. Leo raises.

As to the historical affairs of PDI, it is not for Dr. Goodenowe to speculate why the Saskatchewan Government wrote down its investment in 2012, if it in fact did do so. Other investors saw significant and growing value in the company. For instance, Golden Opportunities Fund Inc., in its semi-annual report as of February 28, 2015, carried its PDI equity holdings at a fair value implying a total PDI enterprise value of \$133.5 million.<sup>1</sup>

At the time certain investors instituted receivership proceedings against PDI in late 2015, significant regulatory and scientific groundwork had been completed, including the filing of an Investigational New Drug application ("IND") for Plasmalogen Precursor PPI-1011 with the FDA. The receivership, initiated by Golden Opportunities Fund Inc., interrupted this program. The assets of PDI were bought by a group of PDI's investors, including Golden Opportunities Fund, through Med-Life Discoveries LP, for a fraction of their true value. Since this takeover, Med-Life Discoveries has continued to advance the PDI clinical program, reflecting the significant ongoing value of Dr. Goodenowe's work through PDI.

Mr. Leo has not provided copies of any of the documents to which he refers, including the affidavit referred to in his tenth question. But what he misunderstands is that each statement attributed to Dr. Goodenowe truthfully refers to two different clinical programs. The Alzheimer's program (which involved only PPI-1011) was in full progress (IND filed and in process of being finalized for human trials) and the IND for the RCDP program (which involved adding PPI-1025 and PPI-1017 to the PPI-1011 program) was being prepared. In any event, the PDI receivership, not any absence of scientific progress, interrupted the path to formal clinical trials for both AD and RCDP.

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<sup>1</sup> See the attached Semi-Annual Report of GOFI dated February 28, 2015.

As to the timing of future business, clinical trials, and manufacturing activities, Dr. Goodenowe can confirm that current programs are active and on schedule. Dr. Goodenowe has every intention of continuing to comply with all regulatory requirements. All regulatory submissions are on schedule.

4089074 Manitoba Ltd. is a company that, to Dr. Goodenowe's knowledge, owns the 1400 Lakeview property. Dr. Goodenowe leases the property from this company. Dr. Goodenowe has no ownership interest or other association with this company.

Finally, I express concern about the source of the premise for this further story, which Mr. Leo does not explain. We urge Mr. Leo and his editors at CBC to consider carefully the interests of those who may be working through Mr. Leo to promote such negative stories, including those with a financial interest in Dr. Goodenowe's professional and financial ruin.

We hope that Mr. Leo and CBC will reconsider the publication of this "history" story in particular and the series of articles apparently intended to attack Dr. Goodenowe's reputation. In any case, we expect your clients to otherwise comply with appropriate journalistic standards.

Your clients should expect any further defamatory publication concerning these matters to result in litigation. Please ensure that they take steps to preserve all documents relevant to any reporting by Mr. Leo or anyone else at CBC in relation to Dr. Goodenowe and his business including, in particular, this intended story.

For this purpose, documents include any form of recorded communication, including but not limited to notes from interviews, electronic communications (email, text message, WhatsApp, etc.) with sources and all documents provided by unnamed sources in the original form in which they were provided, as well as all material, in electronic or hard copy form, otherwise relating to the production or editing of your article.

If Mr. Leo or others at CBC use Signal, Telegram or other similar modes of communication which include auto-delete functionality, we expect any such functions to be suspended and/or a record of all communications to be actively maintained so that a complete record is available to any court which will have to review the propriety of the journalistic conduct here.

I look forward to hearing from you.

Yours very truly,

A handwritten signature in blue ink, appearing to read 'Brian Kolenda', written in a cursive style.

Brian Kolenda

BK/tr

c. Margaret Robbins/Madison MacKinnon, Lenczner Slight  
Geoff Leo