

A heading

1. In addition to the requirement of an “actionable wrong” independent of the breach sued upon, punitive damages will only be awarded “where the defendant’s misconduct is so malicious, oppressive and high-handed that it offends the court’s sense of decency” (*Hill*). Such behaviour has included defamation (*Hill*), failing to provide medical care (*Robitaille*), and exceptionally abusive behaviour by an insurance company (*Whiten*). Here’s another citation to *Robitaille* with a pinpoint (the first didn’t have one) (*Robitaille*).

Hill v Church of Scientology of Toronto, [1995] 2 SCR 1130 at para 196, 184 NR 1, Cory J [*Hill*]

Robitaille v Vancouver Hockey Club, [1981] 3 WWR 481 at para 23, 124 DLR (3d) 228 (BCCA) [*Robitaille*]

Whiten v Pilot Insurance, 2002 SCC 18, [2002] SCR 295 [*Whiten*]

2. Since the primary vehicle of punishment is the criminal law, punitive damages should be scarcely used (*Whiten*). It is also important to underline that there cannot be joint and several responsibility for punitive damages because they arise from the misconduct of the particular defendant against whom they are awarded.

Whiten, *supra* para 1 at para 69

Hill, *supra* para 1 at para 195

Another heading

A subheading

3. Here, I cite to several pinpoints inline. Those pinpoints should be collected and then reported together in the paragraph notes below. Here’s the first pinpoint (*Hill*). Here’s the second pinpoint (*Hill*). Here’s the final pinpoint (*Hill*).

Hill, *supra* para 1 at paras 5, 20, 80

Another subheading

4. Typeface is Charter.