



COURT FILE NO. 2401-11397

COURT Alberta Court of King's Bench

JUDICIAL CENTRE Calgary

PLAINTIFF(S) Michael Taylor

DEFENDANT(S) Dale Adams Automotive Ltd., Abc Corporation, John Doe

DOCUMENT Affidavit of Records

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT  
Michael Taylor  
80043 261 Ave E  
Foothills, Alberta  
T1S4G5  
[Redacted]

AP

Affidavit of Records of Michael Taylor  
Sworn (of Affirmed) by Michael Taylor  
ON April 25, 2025

I, Michael Taylor,  
of Foothills County, Alberta  
have personal knowledge of the following or I am informed and do believe that:

\* identify which party you are in relation to this lawsuit. (Example, Plaintiff, Defendant, etc.)

1. I am the plaintiff.
2. The records listed in Schedules 1 and 2 are under the control of the plaintiff.
3. The plaintiff(s) object(s) to produce the records listed in Schedule 2 on the grounds of privilege identified in that Schedule.

- 4. The records listed in Schedule 3 were previously under the control of the plaintiff, but ceased to be so at the time and in the manner stated in Schedule 3.
- 5. Other than the records listed in schedules 1, 2 and 3, the plaintiff(s) does not have and never had any other relevant material records under the plaintiff's(s') control.

SWORN (or affirmed) BEFORE ME

on April 25, 2025

at Calgary Alberta.

*[Handwritten signature of Amen Dhaliwal]*

(Commissioner for Oaths in and for the Province of Alberta)

**Amen Dhaliwal**  
A Commissioner for Oaths  
in and for Alberta  
My Commission Expires Nov. 15, 2025

(Print Name and Expiry of Lawyer/Student-at-Law/Commissioner or JP)

*[Redacted signature]*

(Signature of Plaintiff/Defendant/Plaintiff's Representative/Defendant's Representative/Corporation's Representative/Litigation Representative)

MICHAEL TAYLOR

(Print Name)

**SCHEDULE 1**

Relevant and material records under the Plaintiff's(s') control for which there is no objection to produce:

	DATE (OR OTHER CONVENIENT ORDER)	DESCRIPTION
1	April 24, 2025	Affidavits executed by the plaintiffs and plaintiff witnesses
2	April 24, 2025	A bundle of records pertaining to the Plaintiffs Business' (certificates of incorporation, articles, partnership declaration, share purchase agreement, licensure etc.)
3	April 24, 2025	A bundle of records pertaining to matters with WCB (emails, letters, notices, claims, invoices, payments etc.)
4	April 24, 2025	A bundle of records pertaining to the plaintiff's financial history (statements, transactions, credit applications, lender/debtor agreements, annual tax filings, assessments etc.)
5	April 24, 2025	A bundle of records pertaining to the plaintiff's insurance history & correspondence (emails, quotes, policies, claims, payments etc.)
6	April 24, 2025	A bundle of records pertaining to the Plaintiffs' housing, tenancy and correspondence related to the RTDRS & KB file # 2403-18471
7	April 24, 2025	A bundle of records pertaining to the plaintiffs business operations (client contracts, service agreements, project proposals, permit applications, job site photos / videos etc.)
8	April 24, 2025	A bundle of records pertaining to vehicle & equipment history (maintenance, repairs, emails, work orders, inspections, receipts etc.)
9	April 24, 2025	Extensive pertinent digital evidence (photographs, video recordings, audio recordings, emails, text messages and phone history)
10	April 24, 2025	Plaintiffs AGLC Self Exclusion agreement
11	TBD	Additional records acquired through the FOIP process (i.e dossiers outlining medical history / criminal intervention). Such records will be acquired at a time that is currently unknown to the plaintiff.

**SCHEDULE 2**

**Relevant and material records under the Plaintiff's(s') control for which there is an objection to produce:**

- (a) without prejudice communications;
- (b) communications and copies of communications between solicitor and client;
- (c) solicitors' work product, including all interoffice memoranda, correspondence, notes, memoranda and other records prepared by the solicitors or their assistants;
- (d) records made or created for the dominant purpose of litigation, existing or anticipated;
- (e) other: *(provide particulars of objection relied on)*
- (f) records that fall into 2 or more of the categories described above:

**SCHEDULE 3**

Relevant and material records previously under the control of the Plaintiff(s)

DESCRIPTION OF RECORD	WHEN THIS RECORD CEASED TO BE UNDER PLAINTIFF'S(S)/ DEFENDANT'S(S) CONTROL	MANNER IN WHICH THIS RECORD CEASED TO BE UNDER PLAINTIFF'S(S)/ DEFENDANT'S(S) CONTROL	PRESENT LOCATION OF THE RECORD
1 Emails between Cole Terras / Michael Taylor Sept - Oct 2023	discovered were seized, altered, or destroyed as of approximatly August/24	surreptitious and unlawful means	doubtfully still in possession of Cole Terras.likely destroyed
2			
3			

**NOTICE**

The time when the producible records listed in this affidavit of records may be inspected is between 9:00 AM and 4:00 PM on July 25, 2025 .

The place at which the producible records may be inspected is Calgary Court Center or other mutually convenient location .