

FORM 171B - Rule 171

T-171-25

FEDERAL COURT OF CANADA

BETWEEN:

Michael Taylor

Plaintiff

and

His Majesty the King (in the right of the province of Alberta), (Attorney General of Canada) Arif Virani, (former Minister of Public Safety) Dominic Leblanc, (Alberta Defendant Minister of Justice) Mickey Amery, (Alberta Deputy Premier & Minister of PSES) Mike Ellis, (Minister of Service Alberta and Red Tape Reduction) Dale Nally, Alberta (Workers Compensation Board), Royal Bank Of Canada, Business Development Bank of Canada, The City of Calgary, Enmax Power Corporation, Calgary Police Service, Municipal District of Foothills No. 31, Gail Greenough, ParklandGeo Ltd., Michael Staple, Digicom Technology Services Inc., Cole Terras (Doug Lacey Basement Authority), Ryan Seamans, Cochrane Landscape Supply Ltd., James Connolly, Jen McMullin, Kevin Les , Tanya Mclee; Joshua Staff, Christopher Bond, 1B Jensen Masonry Ltd, Christopher Bartsch, Ryan Landine, Kristi Zychowa, Kathleen Mullally, Elaine McGee, Marion Skaja, Darlene Addun, Steven Kletke, Sean Strachan , ABC Corporation, ABC Corporation, John Doe, John Doe

Defendants

STATEMENT OF DEFENCE, of Defendant, Cochrane Landscape Supply Ltd.

1. The Statement of Claim does not disclose a reasonable cause of action as against Cochrane Landscape Supply Ltd. and lacks sufficient detail to identify the facts on which the Plaintiff is relying and thus constitutes an improper pleading.
2. Except as expressly admitted, the Defendant Cochrane Landscape Supply Ltd. (the “Defendant” or “Cochrane Landscape Supply Ltd.”). denies all allegations contained in the Statement of Claim and puts the Plaintiff to the strict proof thereof.
3. Although not specifically pled, the Defendant denies that the Plaintiff suffered any injuries or losses as a result of any unlawful or negligent acts on the part of the Defendant.
4. The Defendant denies it was negligent or in breach of any duty, or in breach of any contract, whether as alleged or at all.
5. The Defendant denies that it owed any specific duty of care to the Plaintiff as alleged or at all and puts the Plaintiff to the strict proof thereof.

6. In the alternative, if the Defendant did owe a duty of care to the Plaintiff which is not admitted and expressly denied herein, the Defendant denies that it reached any such duty.
7. The Defendant further denies that any act or omission on their part caused any damage to the Plaintiff and puts the Plaintiff to the strict proof thereof.
8. The Defendant further denies that it or any of its employees and/or agents were negligent, in breach of contract, in breach of any fiduciary duty or other duty owed to any of the Plaintiff and puts the Plaintiff to the strict proof thereof.
9. Further, and in the alternative, if the Plaintiff suffered damages or losses as alleged in the Statement of Claim, or at all, which is not admitted but specifically denied, then such damages are excessive, too remote to be attributed to the Defendant or its employees are not recoverable at law.
10. If the Plaintiff has suffered any damage attributable to any act or omission on the part of the Defendant, which is not admitted and specifically denied herein, the Plaintiff has filed to mitigate those damages as required by law.
11. The Defendant pleads and relies on the *Limitations Act*, RSA 2000, c L-12 and states that they are entitled to immunity from liability in respect of the Plaintiff's claims, as the Plaintiff's claims against the Defendant are statute barred since this claim has been brought outside of the two-year limitation period.
12. The Defendant further pleads and relies upon the provisions of the *Contributory Negligence Act*, R.S.A. 2000, c. C-27, and the *Tortfeasors Act*, R.S.A. 2000, c. T-5, all as amended, and any and all regulations enacted thereto to the foregoing legislation.
13. The Defendant asks that the Plaintiff's claim be dismissed with costs.

February 13, 2025

Hooey & Company Lawyers

Per: _____



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