

FEDERAL COURT

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 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, GROUNDWORKS (DOUG LACEY BASEMENT AUTHORITY), RYAN SEAMANS, COCHRANE LANDSCAPE SUPPLY LTD., JAMES CONNOLLY, JEN MCMULLIN, KEVIN LES, TANYA MCKEE, JOSHUA STAFF, CHRISTOPHER BOND, IB 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

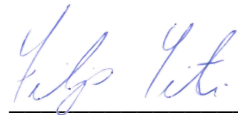
1. The Defendant, ENMAX Power Corporation (“**ENMAX**”), does not attorn to the jurisdiction of this Honourable Court by the service and filing of this Statement of Defence.
2. This Honourable Court has no jurisdiction over the allegations set out in the Statement of Claim made against ENMAX.
3. The allegations in the Statement of Claim and the relief sought by the Plaintiff, Michael Taylor, in respect of ENMAX, are exclusively common law tort claims made against ENMAX, a corporate entity incorporated in the Province of Alberta.
4. This Honourable Court has no statutory grant of jurisdiction over the allegations made in the Statement of Claim as against ENMAX.

5. There is no existing body of federal law in respect of the allegations made in the Statement of Claim that is essential to the disposition of the within Action as against ENMAX.
6. The Statement of Claim is not based on a “law of Canada” as that phrase is used in section 101 of the *Constitution Act*, 1867, in respect of the allegations made, and the relief sought, as against ENMAX.
7. It is plain and obvious that this Honourable Court lacks jurisdiction in respect of the allegations set out in the Statement of Claim as against ENMAX, and the Statement of Claim should be struck as against ENMAX pursuant to Rules 208 and 221 of the *Federal Rules of Court*, SOR/98-106.

Requested Disposition

8. WHEREFORE ENMAX respectfully requests that the Action be dismissed against ENMAX with costs, and such further and other relief as this Honourable Court deems just.

February 18, 2025



JENSEN SHAWA SOLOMON DUGUID HAWKES LLP
Barristers
800, 304 - 8 Avenue SW
Calgary, Alberta T2P 1C2

Filippo Titi
Phone: 403 571 1063
Fax: 403 571 1528
Email: titif@jssbarristers.ca
File: 16186-003

Solicitors/Counsel for the Defendant, Enmax Power Corporation

TO: Michael Taylor
80043 261 Ave
Foothills, Alberta T1S 4S6

Phone: [REDACTED]
Email: [REDACTED]