

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, Parkland Geo Ltd., Michael Staple, Digicom Technology Service Inc., Cole Terras, Groundworks (Doug Lacey Basement Authority), Ryan Seamans, Cochrane Landscape Supply Ltd., James Connolly, Jen McMullin, Kevin Les, Tanya Mckee, Joshua Stuff, Christopher Bond, IB Jensen Masonry Ltd, Christopher Bartsch, Ryan Landine, Kristi Zycholwa, Kathleen Mullally, Elaine McGee, Marion Skaja, Darlene Addun, Steven Kletke, Sean Strachan, ABC Corporation, John Doe, John Doe

Defendants

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**MOTION RECORD OF THE PLAINTIFF**  
**(requesting an extension of time & leave to amend pleadings)**

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Michael Taylor  
80043 261 Ave E  
Foothills, Alberta  
T1S 4G5

To: Registrar  
Federal Court  
4th Floor, 635 8th Ave SW  
Calgary, Alberta  
T2P 3M3

To:

Department of Justice Canada

National Litigation Sector

Prairie Region, Edmonton Office

#300, 10423 – 101 Street

Edmonton AB T5H 0E7

Attention: Yan Wang

Telephone: (236) 330-5931

Email: [yan.wang@justice.gc.ca](mailto:yan.wang@justice.gc.ca)

Solicitor for the Defendants, (Attorney General of Canada) Arif Virani and  
(former Minister of public safety) Dominic Leblanc

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Alberta Justice Legal Services Division

9th Floor, Peace Hills Trust Tower

10011 – 109 Street

Edmonton, AB T5J 3S8

Attention: Shaheer Meenai

Telephone: (780) 422-9200

Facsimile: (780) 427-1230

Email: [shaheer.meenai@gov.ab.ca](mailto:shaheer.meenai@gov.ab.ca)

Solicitor for the Defendants, His Majesty the King (in the right of the province of Alberta),  
(Alberta Minister of Justice) Mickey Amery, (Alberta Deputy Premier & Minister of PSES)  
Mike Ellis, and (Minister of Service Alberta and Red Tape Reduction) Dale Nally

FAR-SIGHT LAW FIRM

354 8th Ave NE

Calgary AB T2E 3J8

Attention: Ashwin Gupta

Telephone: (587) 349-3153

Email: [agupta@far-sight.ca](mailto:agupta@far-sight.ca)

Solicitor for the Defendant, Elaine McGee

---

Borhot Law

#220, 1231 – 9 Avenue SE

Calgary AB T2G 0S9

Attention: Samerah Borhot

Telephone: (403) 474-8023

Email: [samerah@borhotlaw.com](mailto:samerah@borhotlaw.com)

Solicitor for the Defendant, IB Jensen Masonry Ltd.

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JSS Barristers

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Calgary AB T2P 1C2

Attention: Filippo Titi

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Email: [titif@jssbarristers.ca](mailto:titif@jssbarristers.ca)

Solicitor for the Defendant, ENMAX Power Corporation

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Marion Skaja

[REDACTED]

Calgary AB [REDACTED]

Telephone: [REDACTED]

Email: [marion@mskaja-barristersolicitor.com](mailto:marion@mskaja-barristersolicitor.com)

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Miller Thomson LLP

43rd Floor, 525 – 8 Avenue SW

Calgary AB T2P 1G1

Attention: Patrick D. Fitzpatrick / Natasha Doelman / D. Josiah Allison

Telephone: (403) 298-2437

Email: [pfitzpatrick@millerthomson.com](mailto:pfitzpatrick@millerthomson.com) / [ndoelman@millerthomson.com](mailto:ndoelman@millerthomson.com) / [dallison@millerthomson.com](mailto:dallison@millerthomson.com)

Solicitors for the Defendants, Kathleen Mullaly and Business Development Bank of Canada

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Hauber & Rees Lawyers

Suite 300, 4838 Richard Road SW

Calgary AB T3E 6L1

Attention: Olivia Hauber

Telephone: (403) 356-2863

Email: [olivia@reeslaw.ca](mailto:olivia@reeslaw.ca)

Solicitor for the Defendants, Sean Strachan and James Connolly

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Hooey & Company

Suite 100, 4838 Richard Road SW

Calgary AB T3E 6L1

Attention: Taylor Grantham

Telephone: (403) 984-0080

Email: [taylor@hooeylawyers.ca](mailto:taylor@hooeylawyers.ca)

Solicitor for the Defendants, Cochrane Landscape Supply Ltd. and Steve Kletke

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McLennan Ross LLP

Suite 1900, 600 – 3 Avenue SW

Calgary AB T2P 0G5

Attention: Jody Sutherland

Telephone: (403) 303-9118

Email: [jody.sutherland@mross.com](mailto:jody.sutherland@mross.com)

Solicitor for the Defendant, Darlene Addun

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Witten LLP

2500 Canadian Western Bank Place

10303 Jasper Avenue

Edmonton AB T5J 3N6

Attention: Keltie Lambert

Telephone: (780) 441-3206

Email: [klambert@wittenlaw.com](mailto:klambert@wittenlaw.com)

Solicitor for the Defendant, Parkland GEO Ltd.

**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, Parkland Geo Ltd., Michael Staple, Digicom Technology Service Inc., Cole Terras, Groundworks (Doug Lacey Basement Authority), Ryan Seamans, Cochrane Landscape Supply Ltd., James Connolly, Jen McMullin, Kevin Les, Tanya Mckee, Joshua Stuff, Christopher Bond, IB Jensen Masonry Ltd, Christopher Bartsch, Ryan Landine, Kristi Zycholwa, Kathleen Mullally, Elaine McGee, Marion Skaja, Darlene Addun, Steven Kletke, Sean Strachan, ABC Corporation, John Doe, John Doe

Defendants

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**MOTION RECORD OF THE PLAINTIFF**

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**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, Parkland Geo Ltd., Michael Staple, Digicom Technology Service Inc., Cole Terras, Groundworks (Doug Lacey Basement Authority), Ryan Seamans, Cochrane Landscape Supply Ltd., James Connolly, Jen McMullin, Kevin Les, Tanya Mckee, Joshua Stuff, Christopher Bond, IB Jensen Masonry Ltd, Christopher Bartsch, Ryan Landine, Kristi Zycholwa, Kathleen Mullally, Elaine McGee, Marion Skaja, Darlene Addun, Steven Kletke, Sean Strachan, ABC Corporation, John Doe, John Doe

Defendants

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**NOTICE OF MOTION**  
**(Request for an extension of time & leave to amend pleadings)**

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**TAKE NOTICE THAT** The Plaintiff, Michael Taylor, will make a motion to the Federal Court under Rule 6(b) of the *Federal Court Rules*, SOR/98-106. And rule

**THE MOTION IS FOR:**

1. An order granting the plaintiff an extension of time to file service of the Responding Motion Record scheduled for deliberation on September 10, 2025.
2. An order granting an extension of time to file service of original pleadings (Statement of Claim, Replies to Statements of Defense)

**THE GROUNDS FOR THE MOTION ARE:**

3. The plaintiff has a genuine intention to further proceedings.
4. The plaintiff made a good faith attempt to meet the requirements of the court
5. The explanation for delay and oversight is reasonable
6. It is in the fundamental interest of justice to allow the plaintiff an opportunity to present its case
7. No party would be prejudiced if additional time is granted

**The following Documentary Evidence** will be used in support of the motion:

8. Affidavit and exhibits in support of the motion
9. Written representations of the Plaintiff
10. Such further and other material that this court may permit

**ALL OF WHICH IS RESPECTFULLY SUBMITTED.**

**DATED** at the City of Calgary, in the province of Alberta, this 5th day of September 2025.

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Michael Taylor (Plaintiff)  
80043 261 Ave E  
Foothills, Alberta T1S4G5

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, Parkland Geo Ltd., Michael Staple, Digicom Technology Service Inc., Cole Terras, Groundworks (Doug Lacey Basement Authority), Ryan Seamans, Cochrane Landscape Supply Ltd., James Connolly, Jen McMullin, Kevin Les, Tanya Mckee, Joshua Stuff, Christopher Bond, IB Jensen Masonry Ltd, Christopher Bartsch, Ryan Landine, Kristi Zycholwa, Kathleen Mullally, Elaine McGee, Marion Skaja, Darlene Addun, Steven Kletke, Sean Strachan, ABC Corporation, John Doe, John Doe

Defendants

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**WRITTEN REPRESENTATIONS BY THE PLAINTIFF**

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**PART I. Overview**

1. The plaintiff is requesting an extension of time under *rule 6(b) of the Federal Courts Rules (SOR/98-106)* to allow for service and filing of the '*responding motion record*' scheduled for deliberation on September 10, 2025.
2. The plaintiff is also requesting an order allowing for Leave to amend original pleadings Under *Rule 75 Federal Courts Rules (SOR/98-106)*

## **PART II. Statement of Facts**

3. The Statement of Claim was filed on January 17, 2025
4. Several Statements of Defense and Notices of Motion were received throughout February 2025
5. The Plaintiff made an honest effort respond and file service for each piece of correspondence but was unable to allocate the time necessary to produce thorough and accurate submissions.
6. The plaintiff is self represented and currently works full time to support the necessities of life.
7. The plaintiff attempted to file several pieces of material and has been rejected by the court due to the expiration of time. As such, the plaintiff has been advised that a motion hearing will be required to allow for the acceptance of his materials.
8. The pleadings require amendment in order for the court to properly adjudicate the matter.

## **PART III. Issues**

9. Is it appropriate for the court grant an extension of time for service of the Plaintiffs responding motion record
10. Should the plaintiff be granted leave to amend the deficiencies in the Statement of Claim

## **PART IV. Submissions**

11. The legal framework and factors for determining whether to allow for an extension of time is referred to as the Hennelly Test. *Canada (Attorney General) v. Hennelly, 1999 CanLII 8190 (FCA) Paragraph 3*

[3] *The proper test is whether the applicant has demonstrated*

- (i) a continuing intention to pursue his or her application;*
- (ii) that the application has some merit;*
- (iii) that no prejudice to the respondent arises from the delay; and*
- (iv) that a reasonable explanation for the delay exists.*

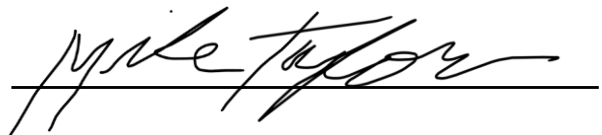
11. The Plaintiffs continued intention to advance proceedings is evident. The Plaintiff consistently demonstrates courtesy toward the Defendants in his acknowledgment of their correspondence, allowing for unhindered proof of service.
12. The Plaintiffs application has merit. The Plaintiff requested permission from multiple defendants regarding service of pleadings immediately upon realization of his inability to meet upcoming deadlines. The Plaintiff received permission on most of these occasions.
13. The plaintiff has sacrificed hundreds of hours of time in consideration of these proceedings. Moreover, the Plaintiff has authored a significant amount of written material in support of his claim. The Plaintiff respectfully submits that it would be in the fundamental interests of justice, and procedural fairness, that his materials are accepted and considered by the court.
14. No prejudice to the respondents has arisen, or would arise, from the approval of the Plaintiffs request for an extension of time.
15. The Defendants were in receipt of the materials well in advance of the hearings, and prior to the deadline ordered by the court.
16. The cause for the delay is reasonable. The plaintiff is self-represented with no legal background. Any procedural oversight stems from the Plaintiffs primitive understanding of the rules that govern the civil process, and his nuanced responsibilities. The plaintiff has no intention to delay, stall or circumvent these responsibilities.
17. Courts have been consistent in finding that substantive justice and fairness should prevail over any strict adherence to deadlines. The plaintiff respectfully submits that granting the requests of his application for an extension of time and leave to amend the pleadings would indeed promote substantive justice and fairness in this particular situation.

## **PART V. Order Sought**

1. The plaintiff seeks an order granting:
  - (a) an extension of time for service of the responding motion records
  - (b) leave to amend original pleadings Statement of claim and replies to statements of Defense
  - (c) any further relief that this Honorable Court deems just.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED.**

**DATED** at the City of Calgary, in the province of Alberta, this 5th day of September 2025.

A handwritten signature in black ink, appearing to read "Michael Taylor", is written over a solid horizontal line.

**Michael Taylor (Plaintiff)**

## **PART VI. List Of Authorities**

### **Statutes and Legislation**

*Federal Courts Rules, SOR/98-106*

### **Case Law**

*Canada (Attorney General) v. Hennelly, 1999 CanLII 8190 (FCA)*

*Canada v. Pomeroy Acquireco Ltd., 2021 FCA 187*

*Canderel Ltd. v. Canada, [1994] 1 F.C. 3 (C.A.)*

*Sanofi-Aventis Canada Inc. v. Teva Canada Limited, 2014 FCA 65*

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, Parkland Geo Ltd., Michael Staple, Digicom Technology Service Inc., Cole Terras, Groundworks (Doug Lacey Basement Authority), Ryan Seamans, Cochrane Landscape Supply Ltd., James Connolly, Jen McMullin, Kevin Les, Tanya Mckee, Joshua Stuff, Christopher Bond, IB Jensen Masonry Ltd, Christopher Bartsch, Ryan Landine, Kristi Zycholwa, Kathleen Mullally, Elaine McGee, Marion Skaja, Darlene Addun, Steven Kletke, Sean Strachan, ABC Corporation, John Doe, John Doe

Defendants

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**DRAFT ORDER**

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**This Court Orders that:**

1. The plaintiffs request for an extension of time is granted. The Plaintiff is granted an extension until September \_\_\_\_\_, 2025 to provide service of the Responding Motion Record.
2. The plaintiff is granted leave to amend the original pleadings.

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Honorable Justice  
Federal Court of Canada

**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, Parkland Geo Ltd., Michael Staple, Digicom Technology Service Inc., Cole Terras, Groundworks (Doug Lacey Basement Authority), Ryan Seamans, Cochrane Landscape Supply Ltd., James Connolly, Jen McMullin, Kevin Les, Tanya Mckee, Joshua Stuff, Christopher Bond, IB Jensen Masonry Ltd, Christopher Bartsch, Ryan Landine, Kristi Zycholwa, Kathleen Mullally, Elaine McGee, Marion Skaja, Darlene Addun, Steven Kletke, Sean Strachan, ABC Corporation, John Doe, John Doe

Defendants

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**AFFIDAVIT OF MICHAEL TAYLOR**

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I, Michael Taylor of the Municipal District of Foothills County in the province of Alberta  
AFFIRM THAT:

1. I am the Plaintiff in this proceeding and have personal knowledge of the matters herein.
2. Under rule 75 of the *Federal Courts Rules (SOR/98-106)* I am seeking to amend the original pleadings, including the Statement of Claim, and Replies to Statements of Defense

3. On September 10, 2025, the Court will rule on motions seeking to strike the Statement of Claim. I am respectfully requesting permission to file an Amended Statement of Claim
4. At the time of filing, I was not cognizant of the severe deficiencies contained within the original statement of claim. I had an honest belief that it would be best to organize the events and facts chronologically, with the personal understanding of their relevance to the claim.
5. In doing so, I overemphasized the importance of including several facts and events which could have easily been omitted from the pleadings and instead presented as supporting evidence.
6. I recognize that I have done a poor job in articulating the causes of action in a way that can be tested, challenged, and ultimately adjudicated. I believe that amendment is necessary to allow the court, the respondents, and the public, to appropriately navigate and reference the claim moving onwards.
7. It is my understanding that Chris Bond, a Defendant named in the original Statement of Claim, is deceased. Since the Defendant is not an integral party to the claim, I would respectfully volunteer to discontinue the action against Mr. Bond, in lieu of pursuing his estate.
8. I submit that amendments are required to multiple parties both present and absent from the statement of claim, including John does.
9. I am requesting an extension of time under *rule 6(b) of the Federal Courts Rules (SOR/98-106)* to allow for service and filing of the '*responding motion record*'
10. On August 3, 2025, I served the Responding Motion Record on the defendants by way of electronic service. The parties were served via email containing an attachment titled '***Plaintiffs Responding Motion August 3, 2025.PDF***'
11. Immediately after serving the document on the defendants, I filed the document with the court via the online submission portal.
12. On the morning of August 6, 2025, I received a telephone call from a Court administrator explaining to me that there were deficiencies and oversight regarding the document, therefore, the document was being rejected by the court.
13. Three deficiencies were noted by the administrator:

- (i) the failure to provide proof of service
- (ii) the document text was authored in an incorrect in size/font
- (iii) the document contained a notice of motion seeking separate relief.

14. The court administrator informed me that the court would now require me to file a separate notice of motion requesting an extension of time to accept my submissions prior to the scheduled hearing.

15. I promptly asked the administrator if the Court “had even booked a date for the hearing yet”, explaining to him that I hadn’t been contacted in several months.

16. The administrator responded by questioning if I had received the Courts correspondence dated June 9, 2025. I responded “No”, because I had not received any correspondence from the court notifying me of a scheduled hearing. During this call is when I first became aware of the scheduled hearing for September 10, 2025, and the deadline of August 4, 2025, for service of my responding motion record.

17. I requested that the court representative email me the correspondence he was referring to and when I arrived home later that evening, I opened the email and viewed the correspondence dated June 9, 2025, for the first time. I thoroughly checked my inbox and emails from that time and confirmed that I hadn’t received any such correspondence.


18. On February 27, 2025, I received an email correspondence from the federal court via ‘CAL-CORRESPOND@cas-satj.gc.ca’. Included in this email was a ‘*direction letter*’ dated February 27, 2025. The email requested that parties confirm receipt of the email/attachment within two days. I provided confirmation for the same day.

19. On March 10, 2025, I received email correspondence from the federal court via ‘CAL-CORRESPOND@cas-satj.gc.ca’. Included in this email was a ‘*direction letter*’ dated March 10, 2025. The email requested that parties provide confirmation of receipt within two days. I provided confirmation the following day.


20. On August 6, 2025, following the telephone call with the Court representative, I received and reviewed correspondence from the federal court via CAL-CORRESPOND@cas-satj.gc.ca’ included in the email was an attachment titled T-


*171-25\_2025061083735 (4).pdf*. The attachment displayed the Federal Court letterhead and subtitle “MEMORANDUM.” The document provides the information with respect to the scheduled date of September 10th, and deadline of August 4, 2025, for submission of the plaintiffs responding motion records.

21. Prior to August 6, 2025, I hadn't received any correspondence from the Court providing a scheduled date for the Motion Hearing. I was never asked to, nor ever provided, any acknowledgement or confirmation of the noted correspondence.
22. Throughout February and March 2025, I received several pieces of correspondence from defendants, including multiple statements of defence and notices of motions to strike. I acted in good faith by promptly acknowledging receipt upon request and did my best to prioritize and respond to all materials, but the significant volume was too much to handle in a very condensed time.
23. I made a genuine effort to serve the replies to the statements of defence and file them with the court in compliance with the rules.
24. On one specific occasion, I attempted to file four replies to statements of defence in person at the court registry. I had personally served each of the defendants with the document but was ultimately denied the ability to file my pleadings with the court.
25. Only after receiving the direction letters from the court dated February 28<sup>th</sup>, and March 10<sup>th</sup>, 2025, did I understand that the motions would need to be heard at the same time. It was with honest and sensible belief that I should then file my motion requesting an extension of time for deliberation during the same hearing. This was my rationale for including the Motion record requesting an extension of time within my Responding Motion record.
26. Exhibit “A” is sent receipt of the email to the defendants containing the responding motion record Dated August 3, 2025.
27. Exhibit ‘B’ is the automatic response email from the federal court filing system dated August 3, 2025
28. Exhibit ‘C’ is the email correspondence and referenced attachment from the court administrator explaining the courts rejection of my submissions with instruction to formally seek an extension of time.

29. Exhibit 'D' is email correspondence between myself and Jody Sutherland – Defense Counsel for Darleene Addun
30. Exhibit "E" is the email service of the Reply to Statement of Defense of Darlene Addun
31. Exhibit "F" is email correspondence to James Connolly serving the Reply to Statement of Defense
32. Exhibit "G" is email correspondence to Marion Skaja providing Service of the Reply to Statement of Defense
33. Exhibit "I" Is email correspondence between myself and Defense Counsel for Defendants BDC and Kathleen Mullally
34. Exhibit "J" is email correspondence between myself and Defense Counsel for Defendants James Connolly and Sean Strachan
35. Exhibit "K" Is email correspondence between myself and defense counsel for Enmax Power Corporation.
36. Exhibit "L" is email correspondence between myself and defense counsel for Defendants Cochran Landscape Supply and Steven Kletke
37. Exhibit "M" Is Email Correspondence between myself and Defense Council for Darleene Addun
38. ~~Exhibit "N" ( Not yet commissioned\*) Is the plaintiffs Responding Motion Record~~ 
39. Exhibit "O" Is a draft of Proposed amendments to the Statement of Claim

Sworn (or Affirmed) before me at the City of Calgary, in the Province of Alberta, on This day  
September 5th, 2025

  
\_\_\_\_\_  
MICHAEL MEDINA

  
\_\_\_\_\_  
MICHAEL TAYLOR

T-171-25 Plaintiffs Responding Motion Record

Mike Taylor 3 August 2025 at 21:58  
To: "Wang, Yan (she her elle la)" <Yan.Wang@justice.gc.ca>, shaheer.meenai@gov.ab.ca, Kate.Bridgett@gov.ab.ca, Ashwin Gupta <agupta@far-sight.ca>, Filippo Titi <titif@jssbarristers.ca>, "Fitzpatrick, Patrick" <pfitzpatrick@millerthomson.com>, dallison@millerthomson.com, Olivia Hauber <Olivia@reeslaw.ca>, taylor@hoeylawyers.ca, jody.sutherland@mross.com, Keltie Lambert <klambert@wittenlaw.com>, samerah@borhotlaw.com, ndoelman@millerthomson.com

Good Evening

Please find attached, for service upon you, The responding Motion record.

This record to be filed with the court immediately following this email.

Sincerely,  
Michael

Plaintiffs Responding Motion August 3, 2025.pdf  
272K

*[Handwritten initials]*

EXHIBIT "A"

This is Exhibit "A" referred to in  
the affidavit of Michael Taylor  
sworn before me in Calgary  
on the 5<sup>th</sup> day of September 2025  
[Signature]  
Commissioner of oaths

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EXHIBIT "B"

----- Forwarded message -----

From: <noreply-nepasrepondre@cas-satj.gc.ca>  
Date: Sunday, 3 August 2025  
Subject: Document(s) Transmitted: 2025-8-4-000036729623513  
To: [REDACTED]  
Cc: [REDACTED]

\*\*\*\*\* THIS MESSAGE WAS AUTOMATICALLY SENT BY THE E-FILING SYSTEM \*\*\*\*\*

We value your feedback! If you have not already done so, please [share your experience](#) with E-Filing in our quick survey.

You have successfully submitted the information and document(s) below:

### Contact Information for the Person Submitting a Filing:

First Name: Michael  
Last Name: Taylor  
Address: 80043 261 Ave E  
City: Foothills  
Province: Alberta  
Postal Code: T1S 4G5  
Telephone Number: [REDACTED]  
E-mail Address: [REDACTED]  
Alternate E-mail Address: [REDACTED]  
Language of communication with Registry: English

This is Exhibit "B" referred to in  
the affidavit of Michael Taylor  
sworn before me in Calgary  
on the 3<sup>rd</sup> day of September 2025  
[Signature]  
Commissioner of Oaths

Court: Federal Court  
Court Number: T-171-25  
Confirmation Number: 2025-8-4-000036729623513

Proceeding Type: Federal Court  
Proceeding Subject: Against the Crown  
Proceeding Nature: Tort (v. Crown)  
Proposed Class Action: No  
Registry Office: Calgary  
Style Of Cause: Michael Taylor and His Majesty the King et al.  
Is Filing Urgent?: No  
Urgency Description:

Filing Party: MICHAEL TAYLOR  
Document type: MOTION RECORD

Mail body: Fwd: T-171-25// Michael Taylor and His Majesty the King et al.

----- Forwarded message -----

From: **CAL-CORRESPOND** <CAL-CORRESPOND@cas-satj.gc.ca>

Date: Wednesday, 6 August 2025

Subject: T-171-25// Michael Taylor and His Majesty the King et al.

To: Mike Taylor [REDACTED]

EXHIBIT "C"

Hello/Bonjour,

As per our phone conversation, your submission of Responding Motion is deficient:

1. No proof of service
2. Did not follow R. 65 of the Federal Courts Rules
3. Attached a notice of motion seeking a different relief

This is Exhibit "C" referred to in  
the affidavit of Michael Taylor  
sworn before me in Calgary  
on the 5<sup>th</sup> day of September 2025  
[Signature]  
Commissioner of Oaths

As per the written direction dated June 9, 2025, the deadline for you to submit a responding motion has passed. You must now seek for an extension of time to file the responding motion.

Attached is sample motion record for your referral and please review the Federal Courts Rules Part 7 regarding motions here: [Federal Courts Rules](#)

Kind regards,

Courts Administration Service | Service Administratif des Tribunaux Judiciaires

4th Floor, 635 8th Ave SW

Calgary, AB T2P 3M3

403-292-5920 | 403-292-5329



Courts Administration  
Service

Service administratif des  
tribunaux judiciaires

Canada

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Michael Taylor v. His Majesty the King et al. | Federal Court Action No. T-171-25 [MR 20250453]

Jody Sutherland <jody.sutherland@mross.com>

19 February 2025 at 16:38

To: [Redacted]
Cc: Spenser Mikoch-Gerke <spenser.mikochgerke@mross.com>

Good afternoon Mr. Taylor,

Please note that I am the lawyer of record on this matter for Ms. Addun. Please ensure that correspondence on this matter is directed to my attention and copied to my assistant (included in the cc line). Ms. Grouette was previously assisting on this matter, but will not be doing so going forward.

I am agreeable to correspondence on this matter by way of email unless specified otherwise on a future date. I have listed my email address as part of my address for service. Accordingly, if the rules permit service of a document by email, I will accept it that way.

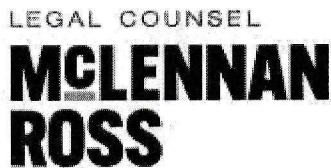
In regard to your Reply to our Statement of Defence, that pleading is not a mandatory one and there are no steps that we can take if you do not file this within the 10 days under the Rules. If the Court is willing to accept your Reply on February 28, we do not have an issue with this. For clarity, however, no extension agreed to as part of this correspondence will impact the April 7 date for which our application to strike is currently set. That application was served by email on February 13, 2025.

Regards,

Jody Sutherland

EXHIBIT "D"

This is Exhibit "D" referred to in the affidavit of Michael Taylor sworn before me in Calgary on the 5th day of September 25



Jody Sutherland | Partner
Direct 403.303.9118 | Fax 403.303.1661 | Toll Free 1.888.543.9120
1900 Eau Claire Tower, 600 - 3rd Avenue SW, Calgary, AB T2P 0G5
mross.com | Member of Meritas | Biography
This e-mail may contain confidential information and be subject to solicitor-client privilege. If received in error, please delete and advise sender. Thank you.

From: Mike Taylor
Sent: Tuesday, February 18, 2025 12:22 PM
To: Sydney Grouette <sydney.grouette@mross.com>
Subject: Re: Michael Taylor v. His Majesty the King et al. | Federal Court Action No. T-171-25 [MR 20250453]

PAGE 31
[Quoted text hidden]

Reply to statement of Defence - Darlene Addun

Mike Taylor  
To: jody.sutherland@mross.com

25 February 2025 at 12:18

Good Afternoon,

Please find attached the reply to the statement of defence for your client Darlene Addun. It will be submitted to the court shortly.

Regards,  
Michael

EXHIBIT "E"

 Reply to Statement of Defence darlene.docx  
36K

This is Exhibit "E" referred to in  
the affidavit of Michael Taylor  
sworn before me in Calgary  
on the 5<sup>th</sup> day of September 20<sup>25</sup>  
[Signature]  
Commissioner of oaths

PAGE 32

Reply to Statement of Defence

Mike Taylor  
To:

16 February 2025 at 13:29

Good afternoon James,

In response to the statement of defence submitted on February 16, 2025 - please acknowledge successful receipt of this email and attachment.

I want to confirm that email service is preferred for all correspondence moving forward. Please confirm that this is your preference aswell.

respectfully,  
Mike

Reply to statement of Defense JC.pdf  
217K

EXHIBIT "F"

This is Exhibit "F" referred to in  
the affidavit of Michael Taylor  
sworn before me in Calgary  
on the 5<sup>th</sup> day of September 2025  
[Signature]  
Commissioner of oaths

Reply to statement of defence

Mike Taylor  
To: marion@mskaja-barristersolicitor.com

3 March 2025 at 14:20

Good afternoon Marion,


Please find attached, for service upon you, the reply to the statement of defence.

Can you please confirm if

1. Email is appropriate for all correspondence moving forward. Email would be my preferred method of communication for all service.
2. You consent for the submission of this document to be filed tomorrow with the federal court.

I recently became aware that I need to provide an affidavit of service for this document, so if you could please acknowledge its receipt, it would be appreciated.

Respectfully,  
Michael

 Reply to statement of defence Marion Skaja.pdf  
97K

G

This is Exhibit "G" referred to in  
 the affidavit of Michael Taylor  
 sworn before me in Calgary  
 on the 5<sup>th</sup> day of September 2025  
[Signature]  
 Commissioner of oaths

Letter from Natasha Doelman of Miller Thomson LLP re MICHAEL TAYLOR v. HIS MAJESTY THE KING, et al [MTDMS-Legal.FID13020833]

Mike Taylor  
To: "Budjak, Sarah" <sbudjak@millerthomson.com>

18 February 2025 at 11:34

Good morning,

I have received your email and correspondence from last week, and anticipate being able to provide the reply to the statement of defence early next week.

In the interest of expediting the service of pleadings, are you able to inform me if any other defendants listed in the action will be represented by Miller Thomson?

It would be my preference for all future correspondence with Miller Thomson to be conducted via email. If you are unable to provide an answer to the aforementioned question, there is no need to reply to this email.

I will issue the reply to the statement of defence as soon a possible.

Respectfully,  
Michael

I

[Quoted text hidden]

This is Exhibit "I" referred to in  
the affidavit of Michael Taylor  
sworn before me in Calgary  
on the 5th day of September 2025  
[Signature]  
Commissioner of courts

Michael Taylor v. Sean Strachan - Our File No. 2500162 | Court Action No. T-171-25

Olivia Hauber <Olivia@reeslaw.ca>

18 February 2025 at 14:08

To: [Redacted]

Cc: Kennedy Sherring <kennedy@reeslaw.ca>

Hi Mike,

Not a problem at all. I agree to take no adverse steps against you, and have no problem waiting until end of March 2025 for a response. No rush.

I should mention that Federal Court can sometimes be tricky with deadlines even if parties agree to an extension, so you may want to check with the Court Clerk to make sure you don't also need the Court's permission for an extension. If you do require the Court's permission, I have no problem providing my consent to same.

Regards,

"J"



**OLIVIA HAUBER**  
BARRISTER & SOLICITOR

PHONE: 403.356.2863  
FAX: 587.316.2225  
EMAIL: OLIVIA@REESLAW.CA

[Quoted text hidden]

This is Exhibit "J" referred to in  
the affidavit of Michael Taylor  
sworn before me in Calgary  
on the 5<sup>th</sup> day of September 2025  
[Signature]  
Commissioner of Oaths

[Quoted text hidden]

RE: T-171-25 - Michael Taylor and His Majesty the King et al. - Motion to Strike

Mike Taylor

27 February 2025 at 11:02

To: Filippo Titi <titif@jssbarristers.ca>

Good Morning Mr. Titi,

I just received a phone call from the Court Registrar with a message stating that our hearing scheduled for March 3 has been postponed.

Can you please confirm if you have received the same message?

I apologize if my responses to you are not immediate, as you can probably understand, I have a lot of correspondence and documents that require my attention. I will make every honest effort to respectfully communicate with you and your client as efficiently as possible moving forward.

Can you please advise if your client is going to provide a statement of defence to address the facts in the statement of claim? I'm not exactly sure how to reply to a statement of defence that solely argues jurisdiction and fails to confirm, dispute, or even reference any of the contents or facts.

I would prefer to communicate and receive service via email, as opposed to registered mail. Could you please confirm if this is mutual and acceptable moving onwards?

Kind regards,  
Michael

[Quoted text hidden]

"K"

This is Exhibit "K" referred to in  
the affidavit of Michael Taylor  
sworn before me in Calgary  
on the 5<sup>th</sup> day of September 2025  
[Signature]  
Commissioner of Oaths



Mike Taylor <[redacted]>

**Michael Taylor v. His Majesty the King, Cochrane Landscape Supply Ltd. et al;  
Federal Court Action #:T-171-25; Serving Statement of Defence**

Mike Taylor <[redacted]>

18 February 2025 at 12:04

To: Dama Jayathilake <dama@hooeylawyers.ca>

Good Morning ,

I am in receipt of your correspondence. Thank you.

It would be my preference for all correspondence and service of documents to be communicated through email, expediting convenience and avoiding unnecessary expenses to all parties. Can you please confirm if this is agreeable?

As you're surely aware, there are a significant number of parties listed as defendants in this action. As such, I am responsible for communicating and replying to each party independently. I will to the best of my ability provide responses in a timely manner, however I also must be respectful of which matters require priority.

I appreciate that you have a duty to provide the best representation for your client, however I do ask that you understand if I may need to request additional time to provide an appropriate response.

That being said, I respectfully ask for an extension until Friday, March 7, 2025 to provide a reply to your clients statement of defence. Can you please confirm if this request will be accommodated without retaliatory measures being taken?

Kind regards,  
Michael  
[Quoted text hidden]

" L "

This is Exhibit " L " referred to in  
the affidavit of Michael Taylor  
sworn before me in Calgary  
on the 5<sup>th</sup> day of September 2025  
[Signature]  
Commissioner of aths

PAGE 39

Michael Taylor v. His Majesty the King et al. | Federal Court Action No. T-171-25 [MR 20250453]

Mike Taylor  
To: Sydney Grouette <sydney.grouette@mross.com>

18 February 2025 at 12:22

Good Afternoon,

I am in receipt of your correspondence dated February 14, 2025. Thank you.

It would be my preference for all correspondence and service of documents to be communicated through email, expediting convenience and avoiding unnecessary expenses to all parties. Can you please confirm if this is agreeable?

As you're surely aware, there are a significant number of parties listed as defendants in this action. As such, I am responsible for communicating and replying to each party independently. I will to the best of my ability provide responses in a timely manner, however I also must be respectful of matters requiring priority.

I appreciate that you have a duty to provide the best representation for your client, however I do ask that you understand if I may need to request additional time within reason to provide an appropriate response.

That being said, I respectfully ask for an extension until Friday February 28, 2025, to provide and file a reply to your client's statement of defence. Can you please confirm if this request can be accommodated without retaliatory measures being taken?

Kind regards,  
Michael  
[Quoted text hidden]

"M"

This is Exhibit "M" referred to in  
the affidavit of Michael Taylor  
sworn before me in Calgary  
on the 5<sup>th</sup> day of September 2025  
[Signature]  
Commissioner of Oaths

PAGE 40

FEDERAL COURT

BETWEEN:

EXHIBIT 10 (1)

MICHAEL TAYLOR

Plaintiff

This is Exhibit "10" referred to in the affidavit of Michael Taylor sworn before me in Calgary on the 5<sup>th</sup> day of September 20 25  
*[Signature]*  
Commissioner of Oaths

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, Parkland Geo Ltd., Michael Staple, Digicom Technology Service Inc., Cole Terras, Groundworks (Doug Lacey Basement Authority), Ryan Seamans, Cochrane Landscape Supply Ltd., James Connolly, Jen McMullin, Kevin Les, Tanya Mckee, Joshua Stuff, Christopher Bond, IB Jensen Masonry Ltd, Christopher Bartsch, Ryan Landine, Kristi Zycholwa, Kathleen Mullally, Elaine McGee, Marion Skaja, Darlene Addun, Steven Kletke, Sean Strachan, ABC Corporation, John Doe, John Doe

Defendants

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PROPOSED AMENDMENTS TO STATEMENT OF CLAIM

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## **I. Parties**

The Plaintiff would amend the Claim to omit certain parties in order to eliminate redundancy. The plaintiff also seeks to add new parties that are integral and material to the causes of action

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## **II. Overview**

This claim arises from a sustained and coordinated abuse of state power, wherein a malicious criminal investigation was initiated against the Plaintiff without any lawful basis. This investigation was initiated for improper purpose and unlawfully perpetuated in bad faith.

Defendants named herein, acted in concert, to weaponize a multitude of legal proceedings against the Plaintiff, with deliberate intention of sabotaging and destroying the plaintiffs' economic agency.

The Principal Conspirators named herein, directly or indirectly, through agent or proxy, unlawfully accessed and disseminated information about the Plaintiff and his businesses that was privileged and confidential. Using the privileged information, the Conspirators sought to satisfy interests that were personal, material, or otherwise.

The Plaintiff asserts that under the guise of "justice", agents and actors of the Crown knowingly and wantonly colluded with private individuals, of a privileged class, in a scheme orchestrated to defraud the Plaintiff. Under the false branding of "protecting public interest," these parties shamelessly misappropriated, and continue to misappropriate public resources in pursuit of their obsession to persecute the Plaintiff.

The Plaintiff will promptly pursue a motion to compel disclosure, to rightly identify the financiers currently footing the legal expenses for multiple Defendants listed in this action. Disclosure of this information is not only of material importance to these proceedings, but vital in the promotion of fairness, impartiality, and protection of public confidence.

Through intimidation, bribery, and other coercive means, the Principal Conspirators were able to recruit and compel defendants named herein to aid and abet in their personal vendetta against the Plaintiff. These actions were high handed, retaliatory, punitive, and undoubtedly bring the administration of justice into disrepute.

The Plaintiff asserts that Crown agents and actors successfully recruited members of the Plaintiffs legal and financial counsel to break confidence, persuade, and manipulate the Plaintiff's actions against his interests. As a direct consequence of the Defendant's actions, the Plaintiffs ability to form and maintain trusting relationships has been materially diminished.

These Individuals are appropriately name as Defendants, and liable in their personal capacities in connection with the Plaintiffs pecuniary, and non-pecuniary losses. See **Roncarelli v. Duplessis**, [1959] S.C.R. 121.

The Plaintiff is seeking Compensatory, Aggravated, Punitive, and Nominal Damages with respect to the conduct of the Crown Defendants.

This claim is not only about personal redress—it is a stand against institutional abuse and coordinated injustice. The Plaintiff brings this action to expose systemic misconduct, restore public confidence in the rule of law, and ensure that NO CANADIAN is subjected to personally motivated persecutions under the guise of justice.

---

### **III. Legal Basis for Damages**

The Plaintiff asserts claims under:

- **Section 24(1) of the Charter (violations of Sections 7, 8, 12, and 15)**
- **Civil conspiracy**
- **Breach of contract**
- **Abuse of process**
- **Malfeasance in public office**
- **Defamation of character**
- **Battery in the form of Non-Consensual Drugging**
- **Tortious conversion & trespass to chattels**
- **Breach of fiduciary duty**
- **Interference with economic relations**
- **Intentional infliction of emotional suffering**

These causes of action reflect a systemic and unlawful campaign against the Plaintiff, warranting significant damages.

### **III. Factual Allegations**

#### **1. Malicious Investigation & Unlawful Seizure**

A criminal / quasi-criminal investigation was initiated and unlawfully continued targeting the Plaintiff. These proceedings were championed to satisfy personal and private interests and fully devoid of any reasonable or probable cause. The concerted efforts by the Principal Conspirators to harm the Plaintiff were entirely punitive in nature, and made with reckless indifference for the rule of law and the plaintiffs civil liberties (Sections 7, 8, 12, and 15 of the Charter)

#### **2. Civil Conspiracy**

The defendants named herein acted in concert, pursuing a common objective to cause harm to the plaintiff. Obtaining personal and material benefits were also key motivators in the decision to specifically target the plaintiff and his business.

The conspiracy involved:

- Pursuing a baseless investigation
- Manipulating legal and administrative processes
- Engaging in coercive tact to threaten and intimidate parties to manufacture a disparaging overview and representation the Plaintiffs character
- Fabricating and disseminating false information with the intent to mislead third parties and cause damage the Plaintiff's reputation and economic interests.
- Tampering, destroying, and omitting exculpatory evidence
- Destabilizing the Plaintiffs secure housing
- Infiltrating the Plaintiffs social circle and sabotaging personal relationships
- Manufacturing illegitimate romantic scenarios (honeypot)
- involuntary drugging of the Plaintiff for the purpose of eliciting false and suggestive dialogue to create an illusion of mental instability or criminal intent.
- Improperly influencing tribunal adjudicators, regulatory administrators, and other public officials, to obstruct the Plaintiffs right to fair and impartial legal processes.

### **3. Breach of Contract**

The Defendants named herein breached the implied duty of good faith negotiations in their dealings with the Plaintiff and his businesses. Some on their own accord, and others under direction of Principal Conspirators, acted to deceive, mislead, and defraud the plaintiff of monies, services, property, and other material value. Such conduct was willful, malicious, and undertaken with intent to unjustly enrich the Defendants at the Plaintiff's expense, resulting in significant financial loss, emotional distress, and deprivation of rightful access to justice and remedy.

### **4. Abuse of process**

As part of the coordinated and unlawful conspiracy, the Principal Conspirators sought to improperly influence adjudicators and administrative decision-makers in proceedings involving the Plaintiff. This interference was not incidental, but rather a deliberate tactic used to subvert the impartiality of legal and quasi-legal processes.

The Defendants' actions included the manipulation of evidence, dissemination of false narratives, and strategic coordination with individuals having prior involvement in the Plaintiff's affairs. These efforts were designed to ensure predetermined outcomes to suppress the Plaintiff's business operations, eliminate his access to capital, and deprive the Plaintiff of Life, Liberty, and Security.

To destabilize the plaintiff's housing and separate him from the business assets, The Plaintiff's landlord was recruited to initiate eviction proceedings against him. The Plaintiff asserts that the RTDRS adjudicator was improperly influenced by the Principal Conspirators, who, acting outside of their given authority, proceeded with their mandate in reckless disregard for the harm it would cause the plaintiff.

These actions directly intended to undermine the integrity of the adjudicative system. The Defendants' actions demonstrate a blatant disregard for legal obligations and ethical standards, warranting punitive damages and full restitution.

**5. Public Exposure & Defamation**

The investigation targeting the Plaintiff was made known to multiple employers, clients, personal and professional associates, industry competitors, colleagues, friends, and family members. This led to reputational damage, emotional suffering, and the collapse of personal and professional relationships. False and misleading information was disseminated with intent to defame, incriminate and defraud Plaintiff of his livelihood and dignity.

**6. Battery through involuntary Drugging and Coerced statements**

The Plaintiff asserts that he was deliberately drugged on multiple occasions by individuals acting in concert with state actors and co-defendants, with the intent to elicit false statements, confessions, or behavior that could be used to fabricate evidence against him.

These incidents predominantly occurred in social settings where the Plaintiff was offered beverages or food under coercive or deceptive circumstances. Following these interactions, the Plaintiff experienced acute disorientation, and erratic and unpredictable mood fluctuations. This behavior was entirely inconsistent with his normal cognitive state.

The Plaintiff asserts that these acts were calculated to undermine his credibility, provoke self-incriminating statements, and support a false narrative of mental instability or criminal intent. The Plaintiff further alleges that these actions were part of a broader conspiracy to obstruct justice and facilitate malicious prosecution.

**7. Tortious Conversion and Tresspass of Chattels**

The Plaintiff's vehicles and other personal chattels were unlawfully converted and trespassed, rendered inoperable and inaccessible, resulting in severe economic harm and overwhelming loss to dignity and self respect. These actions were made with deliberate intent to deprive the Plaintiff of Life, Liberty, and security. The Defendants' actions demonstrate a blatant disregard for due process, regulatory compliance, and ethical standards, warranting punitive damages and full restitution.

## 8. **Breach of Fiduciary Duty**

Lawyers and accountants—entrusted with the Plaintiff’s legal and financial affairs—acted in concert with the principal conspirators to deceive and mislead the Plaintiff. Their actions constituted a breach of their fiduciary obligation to operate with honesty, integrity, and confidentiality.

The mirrored actions of these Defendants to deceive the Plaintiff by deliberately attempting to void contracts and circumvent the duty of care and ethical mandates of their relationships, highlights the fundamental and conscious understanding of their wrongdoing. These parties wantonly aided in the furtherance of an unlawful conspiracy and materially contributed to the psychological trauma inflicted onto the plaintiff.

## 9. **Interference with Communications**

As part of the coordinated conspiracy to destabilize the Plaintiffs livelihood and business operations, the Defendants and their agents voluntarily engaged in illegal seizures of the Plaintiff’s communications. This included pervasive surveillance, unexplained disruption and delays of critical correspondence, and unlawful tampering of phone calls, emails, and other electronic data.

This interference not only violated the Plaintiff’s right to privacy and freedom of expression, but also materially contributed to the economic and psychological harm he suffered. The Defendants acted with impunity and reckless indifference to the provisions of ***Criminal Code, RSC 1985, c C-46*** and **Sections 7 and 8** of the **Canadian Charter of Rights and Freedoms**.

## 10. **Breach of Trust**

The Plaintiff made multiple attempts to report criminal misconduct—including fraud, property destruction, and non-consensual drugging—to both the RCMP and Calgary Police Service.

Despite providing detailed documentation, coupled with photographic evidence and witness accounts, law enforcement officials refused to investigate the Plaintiff’s claims. Officers dismissed the allegations as “civil matters” and failed to take statements or preserve evidence.

It is reasonable to suspect that these crown agents were distinctly aware of, if not actively involved in the proceedings targeting the Plaintiff. The plaintiff deduces that the lack of documented intervention was thoughtfully intended to prioritize the interests of the Principal Conspirators, it's agents and laundry list of cooperators in preference to protecting the safety, security, bodily autonomy, property rights and civil liberties of the Plaintiff.

History will reflect that the use of MR. BIG is almost exclusively used for situations involving the most serious of crimes. Particularly homicide investigations or cases involving missing children, when the stakes are high, and public pressure and expectation is palpable.

The Plaintiffs experience seems to suggest that a new, much broader application for using these patented “techniques” is now being deployment by Agents of the Canadian Justice Department.

#### **11. Intentional Infliction of Emotional Suffering**

The cumulative conduct—malicious investigation, betrayal by professionals, public humiliation, and forced eviction—was calculated to cause emotional distress. The Plaintiff suffered anxiety, depression, and loss of dignity.

#### **12. Interference with Economic Relations**

The Plaintiffs business relationships were sabotaged through targeted interference, resulting in lost income, depreciated good will that materially effects future income.

#### **13. The Plaintiff asserts that the conduct described above constitutes:**

- A violation of **Section 7** (life, liberty, and security of the person)
- A violation of **Section 8** (unreasonable search and seizure)
- A violation of **Section 12** (prevention of cruel and unusual punishment)
- A violation of **Section 15** (equality before and under the law)
- An egregious abuse of power and breach of the public trust

The Plaintiff seeks damages under **Section 24(1)** of the Charter, which authorizes courts to award remedies that are “appropriate and just in the circumstances.”

#### **IV. Quantum of Damages**

The Plaintiff will appropriately amend the Claim to better articulate the relief sought.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED.**

**DATED** at the City of Calgary, in the province of Alberta, this 5th day of September 2025.

A large black rectangular redaction box covers the signature area. Below the redaction, there are several diagonal lines, likely representing the original signature or a stylized mark.

**Michael Taylor (Plaintiff)**



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, Parkland Geo Ltd., Michael Staple, Digicom Technology Service Inc., Cole Terras, Groundworks (Doug Lacey Basement Authority), Ryan Seamans, Cochrane Landscape Supply Ltd., James Connolly, Jen McMullin, Kevin Les, Tanya Mckee, Joshua Stuff, Christopher Bond, IB Jensen Masonry Ltd, Christopher Bartsch, Ryan Landine, Kristi Zycholwa, Kathleen Mullally, Elaine McGee, Marion Skaja, Darlene Addun, Steven Kletke, Sean Strachan, ABC Corporation, John Doe, John Doe

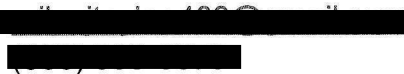
Defendants

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**RESPONDING MOTION RECORD OF THE PLAINTIFF**

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Michael Taylor  
80043 261 Ave E  
Foothills, Alberta  
T1S 4G5



Registrar  
Federal Court  
4th Floor, 635 8th Ave SW  
Calgary, Alberta  
T2P 3M3

TO:

Department of Justice Canada

National Litigation Sector

Prairie Region, Edmonton Office

#300, 10423 – 101 Street

Edmonton AB T5H 0E7

Attention: Yan Wang

Telephone: (236) 330-5931

Email: [yan.wang@justice.gc.ca](mailto:yan.wang@justice.gc.ca)

Solicitor for the Defendants, (Attorney General of Canada) Arif Virani and  
(former Minister of public safety) Dominic Leblanc

---

Alberta Justice Legal Services Division

9th Floor, Peace Hills Trust Tower

10011 – 109 Street

Edmonton, AB T5J 3S8

Attention: Shaheer Meenai

Telephone: (780) 422-9200

Facsimile: (780) 427-1230

Email: [shaheer.meenai@gov.ab.ca](mailto:shaheer.meenai@gov.ab.ca)

Solicitor for the Defendants, His Majesty the King (in the right of the province of Alberta),  
(Alberta Minister of Justice) Mickey Amery, (Alberta Deputy Premier & Minister of PSES)  
Mike Ellis, and (Minister of Service Alberta and Red Tape Reduction) Dale Nally

FAR-SIGHT LAW FIRM

354 8th Ave NE

Calgary AB T2E 3J8

Attention: Ashwin Gupta

Telephone: (587) 349-3153

Email: [agupta@far-sight.ca](mailto:agupta@far-sight.ca)

Solicitor for the Defendant, Elaine McGee

---

Borhot Law

#220, 1231 – 9 Avenue SE

Calgary AB T2G 0S9

Attention: Samerah Borhot

Telephone: (403) 474-8023

Email: [samerah@borhotlaw.com](mailto:samerah@borhotlaw.com)

Solicitor for the Defendant, IB Jensen Masonry Ltd.

---

JSS Barristers

#800, 304 – 8 Avenue SW

Calgary AB T2P 1C2

Attention: Filippo Titi

Telephone: (403) 571-1520

Email: [titif@jssbarristers.ca](mailto:titif@jssbarristers.ca)

Solicitor for the Defendant, ENMAX Power Corporation

---

Marion Skaja

████████████████████

Calgary AB ██████████

Telephone: (██████████, ██████████)

Email: [marion@mskaja-barristersolicitor.com](mailto:marion@mskaja-barristersolicitor.com)

---

Miller Thomson LLP

43rd Floor, 525 – 8 Avenue SW

Calgary AB T2P 1G1

Attention: Patrick D. Fitzpatrick / Natasha Doelman / D. Josiah Allison

Telephone: (403) 298-2437

Email: [pfitzpatrick@millerthomson.com](mailto:pfitzpatrick@millerthomson.com) / [ndoelman@millerthomson.com](mailto:ndoelman@millerthomson.com) / [dallison@millerthomson.com](mailto:dallison@millerthomson.com)

Solicitors for the Defendants, Kathleen Mullaly and Business Development Bank of Canada

---

Hauber & Rees Lawyers

Suite 300, 4838 Richard Road SW

Calgary AB T3E 6L1

Attention: Olivia Hauber

Telephone: (403) 356-2863

Email: [olivia@reeslaw.ca](mailto:olivia@reeslaw.ca)

Solicitor for the Defendants, Sean Strachan and James Connolly

---

Hooey & Company

Suite 100, 4838 Richard Road SW

Calgary AB T3E 6L1

Attention: Taylor Grantham

Telephone: (403) 984-0080

Email: [taylor@hooeylawyers.ca](mailto:taylor@hooeylawyers.ca)

Solicitor for the Defendants, Cochrane Landscape Supply Ltd. and Steve Kletke

---

McLennan Ross LLP

Suite 1900, 600 – 3 Avenue SW

Calgary AB T2P 0G5

Attention: Jody Sutherland

Telephone: (403) 303-9118

Email: [jody.sutherland@mross.com](mailto:jody.sutherland@mross.com)

Solicitor for the Defendant, Darlene Addun

---

Witten LLP

2500 Canadian Western Bank Place

10303 Jasper Avenue

Edmonton AB T5J 3N6

Attention: Keltie Lambert

Telephone: (780) 441-3206

Email: [klambert@wittenlaw.com](mailto:klambert@wittenlaw.com)

Solicitor for the Defendant, Parkland GEO Ltd.

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, Parkland Geo Ltd., Michael Staple, Digicom Technology Service Inc., Cole Terras, Groundworks (Doug Lacey Basement Authority), Ryan Seamans, Cochrane Landscape Supply Ltd., James Connolly, Jen McMullin, Kevin Les, Tanya Mckee, Joshua Stuff, Christopher Bond, IB Jensen Masonry Ltd, Christopher Bartsch, Ryan Landine, Kristi Zycholwa, Kathleen Mullally, Elaine McGee, Marion Skaja, Darlene Addun, Steven Kletke, Sean Strachan, ABC Corporation, John Doe, John Doe

Defendants

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Responding Motion Record

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**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, Parkland Geo Ltd., Michael Staple, Digicom Technology Service Inc., Cole Terras, Groundworks (Doug Lacey Basement Authority), Ryan Seamans, Cochrane Landscape Supply Ltd., James Connolly, Jen McMullin, Kevin Les, Tanya Mckee, Joshua Stuff, Christopher Bond, IB Jensen Masonry Ltd, Christopher Bartsch, Ryan Landine, Kristi Zycholwa, Kathleen Mullally, Elaine McGee, Marion Skaja, Darlene Addun, Steven Kletke, Sean Strachan, ABC Corporation, John Doe, John Doe

Defendants

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**WRITTEN REPRESENTATIONS BY THE PLAINTIFF**

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## **PART I. Facts**

1. T-171-25 was commenced in Federal Court under the provisions of the Crown Liability and proceedings Act (R.S.C., 1985, c. C-50)

2. The statement of claim (“the claim”) suggests that each defendant named in this action has directly contributed towards the damages incurred by the plaintiff. As such, they have been included and identified in the action as respective tortfeasors. In the remedies sought, the plaintiff is requesting that the defendants be held jointly and severally liable with respect to the damages.

3. The fundamental grounds for this claim are rooted in the fact that the plaintiff has been subjected to significantly cruel and inhumane treatment and punishment stemming directly from a malicious and unwarranted prosecution targeted towards him. A prosecution that the plaintiff vehemently defends as being initiated for improper purpose and motivated by personal interests of defendants, constituting malice.

4. The claim states that prior to receiving financing for the purchase of Ananda Consultants Ltd. (“the business”) in 2023, defendants named in this action entered into an agreement (“the conspiracy”) which was criminal in nature, sought to defraud the Plaintiff, bankrupt the business, besmirch his character, and achieve benefit (personal, material or otherwise) for the conspirators through procurement of an indictment, civil forfeiture, and insurance fraud.

5. The claim states that defendants named in this action have aided in the furtherance of this conspiracy, engaging in conduct that they knew, or ought to have known, would cause harm, or was likely to harm the plaintiff. This conduct was contrary to common law, punitive in origin, and directly exacerbated the suffering inflicted onto the plaintiff.

6. The claim states that as a direct result of the concerted and tortious efforts of the conspirators, two vehicles owned by the plaintiff (1 personal, 1 business) were unlawfully converted and rendered inoperable, leaving the plaintiff unable to drive since July 3, 2024.

7. The plaintiff is now forced to rely on public transportation, unduly restricting his employment opportunities, and depriving him of the ability to be compensated a wage that aligns with his aptitude.

8. The claim states that in the pursuit of a common objective to separate the Plaintiff from the assets of the business, the defendants enlisted the cooperation of the plaintiff's landlord to initiate eviction proceedings against the plaintiff, stripping him of the secure and affordable housing he peacefully and responsibly inhabited for over 4 years.

9. The claim states that the defendants showcased reckless indifference towards the plaintiff when engaging in their malfeasance. Abusing the powers of their official capacity, to assure the RTDRS ruled to terminate the plaintiff's tenancy. Ultimately succeeding in their premeditated goal to void the Plaintiff of his occupation ("possession") of the business assets.

10. The materials and documented evidence surrounding the manufactured exile of the plaintiff from his secure and affordable housing are so compelling, they cross the threshold of being irrefutable.

11. The finding of the Tenancy Dispute Officer was a "*Substantial breach of the RTA for operating an illegal business.*" A business which had obtained all required permissions to operate legally and received an APPROVED development / home-based business permit issued by Foothills County. A business that had been granted WRITTEN PERMISSION and had the longstanding support from the property owner, Elaine McGee.

12. The order of the tribunal terminating the Plaintiffs tenancy was then filed through the Kings bench of Edmonton in contravention of rule 3.3(1)(a) of the Alberta Rules of Court.

13. The claim alleges that this was an orchestrated effort by the defendants to establish home court advantage, enabling face to face influence over the proceedings at 1A Sir Winston Churchill Sq NW, Edmonton Alberta.

**14.** The matter quickly became a game of hot potato. The plaintiffs' applications for the RTDRS order to be set aside, repeated requests for transfer to the appropriate jurisdiction, and unwavering objections citing improper purpose were treated as radioactive waste, refusing to be acknowledged on the record.

**15.** The matter has been simply kicked down the road through repeated adjournments with complete disregard for the proper administering of justice. A defiant refusal to relinquish control, apply the rule of law, and appropriately facilitate a transfer for the appeal hearing. The plaintiff paid \$250 for the appeal hearing in October 2024, but the court refuses to facilitate the matter.

**16.** Instead, an order was issued to lure the plaintiff into a pretrial conference (In Edmonton). The likes of which would be completely confidential, void of public access, potentially binding, and unappealable..... An absolute mouse trap.

**17.** The residential tenancy agreement had another party named on the lease, Joshua Staff. Mr. Staff was a registered shareholder, director, and officer (secretary), contributing supporting roles towards the business operations. Mr. Staff displayed nothing but positivity and optimism when speaking to his involvement with the operations of the business in the early goings. Mr. Staff had a significant financial stake in the company and was excited to assist in the growth and overall success of the business.

**18.** Mr. Staff has not been evicted from the residence, nor was ever considered of being in breach of the tenancy agreement for "operating an illegal business."

**19.** Since being forced out of his home, the plaintiff has made countless attempts to retrieve his property from the landlords unlawful detinue. He has been exclusively met with threats of trespass.

**20.** The claim states that Elaine McGee contributed to the furtherance of a concerted and common objective to dismantle the plaintiff's business, convert its assets, and strip the plaintiff of his livelihood and dignity.

21. The claim infers that the Business Development Bank of Canada (“BDC”) committed a breach of contract with the plaintiff.

22. BDC is a crown corporation. The Federal Court has general jurisdiction to adjudicate claims brought against Crown corporations under the provisions of the Crown Liability and proceedings Act (R.S.C., 1985, c. C-50)

23. When the plaintiff entered into the Loan agreement (“the contract”) with BDC, the bank had an obligation to negotiate the terms of that contract in good faith.

24. The claim indicates that BDC acted in bad faith and made fraudulent misrepresentations in their negotiations with the plaintiff.

25. The claim states that BDC had direct knowledge of the prosecution (“the malicious prosecution”) initiated against the plaintiff, therefore having direct knowledge of the plaintiffs (“the borrower”) inability, or likely inability, to repay the loan.

26. As a result of BDC contributory negligence, malice, or otherwise in relation to (“**the conspiracy**”) it is the plaintiffs unwavering position that it’s agents acted in bad faith, and as a result, the plaintiff suffered damages.

27. The exact involvement of the BDC, and the conduct of their lawyers, will become significantly clearer before the trial of this action.

28. The Claim states that Enmax power Corporation (“EPC”) were perpetrators of a false flag operation at [REDACTED] SW Calgary in July of 2023, which cost the plaintiff tens of thousands in financial losses. (“**The Fraud**”)

29. The Plaintiffs position as described in the claim was that the purpose of this operation was to establish a pattern of negligent business practices by purporting to have damaged an underground utility.

30. The claim describes that the intended purpose of this false flag attack was to serve as a precursor incident to later be used as “evidence” in support of Gail Greenough’s (purported owner of [REDACTED]) subsequent civil forfeiture / fraudulent insurance efforts. (**“The conspiracy”**)

31. The claim clearly indicates that during this time is when James Connolly gave notice to cease working on behalf of the plaintiff. (**Tortious interference**)

32. The claim states that Mr. Connolly was “flipped” and coerced into cooperating and assisting in the persecution of the plaintiff, likely stemming from threats to his financial wellbeing, or legal repercussions.

33. The claim states that it was through this intimidation and deception, that Mr. Connolly cooperated without resistance in participating toward the “medicating” of the plaintiff. (**Intentional infliction of emotion stress**)

34. The exact involvement of EPC Board members, directors, agents, and lawyers, will become significantly clearer before the trial of this action.

35. The claim states that Darlene Addun made fraudulent misrepresentations towards the plaintiff during correspondence involving the plaintiffs’ efforts to complete his accounting and tax obligations.

36. the claim states that Ms. Addun provided the plaintiff with two “engagement letters” to provide accounting services for the plaintiff’s businesses. Both business’ have the same registered address and contact information.

37. The first engagement letter received for “Cinderfellas property services Ltd” contained no errors.

38. The second engagement letter for “Ananda Consultants Ltd.” was riddled with spelling errors. The address was way off. It was an absolute mess. These documents

were submitted within days of each other, both being executed and delivered by Ms. Addun.

39. The claim states that the purpose for these errors was a calculated attempt to intentionally void the contract. The reason for wanting to void the contract was to defeat the test for tortious interference or breach of contract. If no valid contract exists, then the claim for tortious interference or breach of contract is defeated.

40. The claim articulates the fact that this was the exact same method used by Marion Skaja to void her retainer agreements. Done for the same exact purpose.

41. The claim states that these parties abused their positions as trusted fiduciaries in the furtherance of a malicious prosecution and conspiracy orchestrated to harm the plaintiff.

42. To be constantly lied to and manipulated for so long, especially by people who are in positions of trust has been so destructive to the plaintiffs' psyche. Completely shattering the plaintiff's ability to trust anybody.

43. Darlene Addun was a total stranger to the plaintiff before June of 2023, yet she agreed to participate in a relentless assault to deceive the plaintiff because she was made to believe that he was a criminal. Every defendant in this action was approached at some time and convinced in one way or another that Mr. Taylor was a dirty, no good, criminal. **(Defamation of Character)**

44. The plaintiff was under 24/7 surveillance, his phone was being monitored, his emails read, his conversations recorded.

45. The plaintiff received disingenuous business inquiries

46. He remained unable to sell any property through online marketplaces except to fake buyers sent to seize his fingerprints **(paragraph 183 of the claim)**

47. His vehicles were sabotaged (one with a remote immobilization device on July 3, 2024) to prevent his meeting with Steven Kletke. **(Tortious interference)**

48. The plaintiffs cell phone was later hacked to change the contact information and call history with Mr. Kletke (**Unlawful seizure/ Obstruction of justice**)

49. The plaintiffs personal credit cards were deactivated at the exact same time so he couldn't pay for repairs his vehicles or pay the accountant (**paragraph 226 of the claim**) (**Unlawful seizure**)

50. What do all these events have in common? **Ex parte warrants** issued by a judge. It is reasonable to believe that these warrants were issued by a federal court, because this is the tradecraft of intelligence operatives.

51) Under the *Canadian Security Intelligence Service Act (R.S.C., 1985, c. C-23)* A "Judge" is defined as being a "judge of the federal court".

52) under the *Privacy Act (R.S.C 1985 c. P-21)* A "court" is defined as "the federal court"

52) For greater purpose, this is an excerpt from the United Nations Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment:

*"For the purposes of this Convention, the term "torture" means any act by which severe pain or suffering, whether physical or mental, is intentionally inflicted on a person for such purposes as obtaining from him or a third person information or a confession, punishing him for an act he or a third person has committed or is suspected of having committed, or intimidating or coercing him or a third person, or for any reason based on discrimination of any kind, when such pain or suffering is inflicted by or at the instigation of or with the consent or acquiescence of a public official or other person acting in an official capacity"*

## Part II. Issues

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Issues to be determined by the honorable court.

1. Should the statement of claim be struck without leave to amend?
2. Are the defendants able to meet the plain and obvious onus to establish that the claim has no merit or chance of success?
3. Are the defendants able to establish that the material facts in the statement of claim, regarded as true, could not possibly give rise to a reasonable cause of action?
4. Does the statement of claim fail to disclose a reasonable cause of action? If so, is this curable by amendment, and would allowing for amendment promote substantive fairness and serve the interest of preserving justice?
5. Does the Federal Court lack jurisdiction over the subject matter and defendants respectively?
6. If the court determines that it has jurisdiction over any of the defending parties or subject matter, is it appropriate for the court to assume jurisdiction and proceed with the matter to allow for the convenient administration of justice?
7. Is there a likelihood that a question of law will arise, or contradictory outcomes may result if duplicitous cases proceed with the same overlapping facts and legal issues?
8. Is there likely to be doubt as to the person(s) from whom the plaintiff is entitled to relief, or doubt as to the respective amounts of each defendant's liability?

### Part III. Submissions

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#### Should the statement of claim be struck without leave to amend?

1. The threshold on a motion to strike is high. The Court must take the facts as pleaded to be true, and the claim should only be struck if it is plain and obvious that it cannot succeed.
2. The onus is on the moving party to satisfy the burden of being plain and obvious that the claim cannot succeed. To meet this burden, the defense needs to establish that the claim has no merit, without offering extended arguments or evidence; cherry picking the pleading.
3. The plaintiffs claim contains sufficient material facts to support causes of action of which this honorable court is capable of granting relief.
4. The Plaintiff submits that the facts and events described within the claim raise justiciable issues within the jurisdiction of this Honourable Court. The plaintiff submits that the issues raised are substantive and warrant full adjudication on their merits.
5. The plaintiff is self represented with no legal background.
6. Striking the statement of claim without leave to amend at this stage of the proceedings would be premature, and opposite the interest of preserving justice; given that there is a genuine issue for trial.
7. The fact that the plaintiff sought help from both the RCMP and the Calgary Police Service in connection with these matters should speak volumes. The Plaintiff sought assistance from authorities *before* filing any proceedings with the courts. The civil process is the only remaining frontier for granting warranted relief to the plaintiff.

8. If a federally appointed prosecutor, judge, or cabinet minister; took it upon themselves to deploy resources, agents, proxies and infrastructure of the Canadian Security Intelligence Service; in an effort to target an innocent, blue collar Canadian citizen, on Canadian soil, with absolutely no concern or evidence pointing to threats of national security; but rather as a favor to help their socialite, equestrian diplomat of a buddy avoid paying for expensive home repairs by fabricating some trumped up indictment against Mr. commonfolk; would this warrant adjudication jurisdiction by the federal court?
  
9. Moreover, Would Mr. Commonfolk; in the pursuit of truth, accountability, and figuring out what the hell he was dosed with that made him so suggestible, and kept him awake for six weeks straight; be deserving of the knowledge and disclosure of what that substance was? If only to understand the potential health risks that may develop in the future? I ask this court. Is this guinea pig not entitled to a vacation? At the very least, a "fishing expedition?"
  
10. Motions to strike are to be granted sparingly and only in the clearest of cases. The plaintiff respectfully submits that this is not such a case, and requests that the motions to strike be dismissed, and the court allow for the matter to proceed

**Does the statement of claim fail to disclose a reasonable cause of action? If so, is this curable by amendment?**

11. The plaintiff's entire livelihood was taken away from him because of defendants' malevolent actions. Suggestion that there is no reasonable cause of action is patently absurd.
  
12. If the honorable court determines that the statement of claim is complete with procedural errors regarding format and structure of the pleadings, then the plaintiff respectfully asks that they be considered only for what they are, procedural errors.
  
13. The plaintiff asks that the court not take away from the reality of the facts, or disregard the reckless indifference shown towards the plaintiffs' person, property, livelihood, and dignity.

14. The plaintiff would request leave to amend the statement of claim to properly plead the following causes of action:

**Malicious prosecution.** Paragraph 375 of the claim summarizes the Plaintiffs experience of being drugged and subjected to prolonged sleep deprivation and psychological manipulation for the purposes of soliciting involuntary statements / confessions. The claim discloses an abundance of pertinent facts regarding the “scenarios” that employed the cooperation of named parties to perpetuate a malignant, pervasive, and improper investigation targeting the plaintiff. This prosecution was initiated for an improper purpose, continued and advanced by unlawful means, to satisfy private interests of individuals acting in official capacities. If the court properly applies the test on a motion to strike and accepts the facts in the claim as accurate and true, then the court accepts as fact that the plaintiff was drugged and subjected to sleep deprivation (torture) in a concerted effort to incriminate and indict him.

**Conspiracy to defraud & Tortious economic interference.**

The plaintiffs claim provides a concise and chronological account of the facts that emphasise the deceitful nature and colluded efforts of the defendants to deprive him of money, property, services or otherwise. The unsolicited and sudden abandonment, false representations, and discernible “change of spirit” towards the plaintiff by service providers, subcontractors, business suppliers, friends, acquaintances etc. were anything but coincidence. The claim describes the great lengths that the defendants travelled to establish legal defenses for the activities they were knowingly engaging in. It speaks directly to the malicious intent, and reckless indifference for the law. If the court properly applies the test on a motion to strike and accepts the facts in the claim as accurate and true, then the court accepts as fact that the defendants knowingly and intentionally sought to obstruct justice, in their pursuit of persecuting the Plaintiff.

**Breach of Fiduciary Duty / abuse of trust.** The statement of claim accurately describes the facts about the deceitful conduct and false representations made by defendants who breached an implied duty of care owed to the plaintiff and his business’. The material facts describing the plaintiffs experience raise significant questions of law, and the public interest should be at the forefront of consideration. If the court properly applies the test on a motion to strike and accepts the facts in the claim as accurate and true, then the court accepts as fact that these fiduciaries flagrantly breached their positions of trust by fraudulently purporting to act of behalf of the Plaintiff, when they in fact were cooperating on behalf of the plaintiffs’ oppressors.

**Tort of intentional infliction of emotional stress / bodily harm.** The claim accurately details the Plaintiffs' subjection to prolonged sleep deprivation over the course of several weeks in October and November 2023. The claim recounts pertinent facts and events that transpired during this period. Most notably, the events of November 22, 2023 (paragraphs 136 – 140 in the claim) which highlight the concerted efforts made by the defendants to manufacture reasonable doubt / plausible deniability in defense of their participation in "medicating" the plaintiff without his knowledge or consent. If the court properly applies the test on a motion to strike and accepts the facts in the claim as accurate and true, then the court recognizes as fact that these conspirators were capable of pressuring individuals in the Plaintiffs social circle to actively participate in drugging the plaintiff

**Charter Damages** The amended statement of claim will better articulate document every alleged infringement of the plaintiff's charter protected rights

**Defamation of Character** The plaintiff trusts that this cause of action is self explanatory and will ensure to articulate specifics in the amended statement of claim, which will be filed and served on the defendants who've yet to be served.

**Fraud.** No need for redundancy.

**Does the Federal Court lack jurisdiction over the subject matter and defendants respectively?**

**15.** The Federal court has general jurisdiction over claims brought under the Crown liability and proceedings Act (R.S.C., 1985, c. C-50)

**16.** Moreover, the court holds inherent jurisdiction to preside over matters adjudicating conflicts related to:

*Canadian Security Intelligence Service Act. (R.S.C., 1985, c. C-23)*

*Privacy Act (R.S.C 1985 c. P-21)*

**17.** The plaintiff believes that this matter satisfies the provisions of the *Federal Courts Act (R.S.C., 1985, c. F-7)* and respectfully asks that the defendants' motion to strike on the grounds of improper jurisdiction be dismissed.

## **PART IV – ORDER SOUGHT**

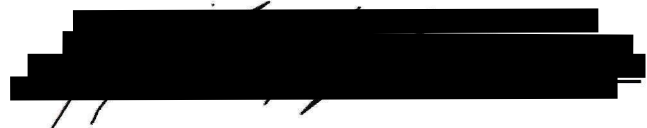
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18. The plaintiff seeks an order:

- (a) Dismissing the Defendants motions to strike
- (b) Dismissing any motions for securities to be paid by the plaintiff
- (c) Costs in the amount of \$500
- (e) any further relief that this Honourable Court deems just.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED.**

**DATED** at the City of Calgary, in the province of Alberta, this 3rd day of August 2025.



**Michael Taylor ( Plaintiff)**

## **PART V. LIST OF AUTHORITIES**

### **Statutes and Legislation**

*Federal Courts Rules, SOR/98-106*

### **Case Law**

Shillington v. Stover, 2023 ONSC 1463 Brown v.

WeirFoulds LLP 2024 ONSC 3429,

Niisaachewan Anishinaabe Nation et al. v. Attorney General of Canada and City of Kenora 2025 ONSC 4166

Mr. Big and the New Common Law Confessions Rule: Five Years in Review, 2020 CanLII Docs 2564

C. W. Muehlberger, Interrogation under Drug Influence, 42 J. Crim. L. Criminology & Police Sci. 513 (1951-1952)

J House, The Use of Scopolamine in Criminology, 2 Am. J. of Police Science 328 (193)