

01/17/2017 11:18 FAX 780 461 8612

Doherty Schuldhaus LLP

0002/0003

COURT FILE NUMBER

COURT

JUDICIAL CENTRE

PLAINTIFF(S)

DEFENDANT(S)

DOCUMENT

COURT OF QUEEN'S BENCH OF ALBERTA

Edmonton

Lauder Industries Inc.

Emilie Anne Reid and Reid Worldwide
Corporation

STATEMENT OF CLAIM

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS DOCUMENTThis Statement of Claim is issued by **Doherty Schuldhaus LLP**,
solicitors for the Plaintiff whose address for service is:c/o Doherty Schuldhaus LLP
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File: 92,935/kn

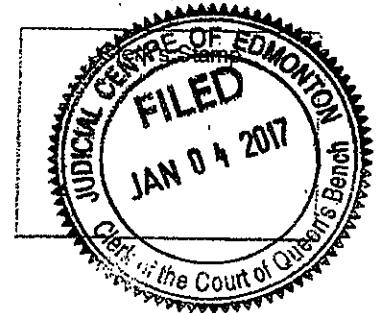
NOTICE TO DEFENDANTS

You are being sued. You are a defendant.

Go to the end of this document to see what you can do and when you must do it.

Statement of facts relied on:

1. The Defendant, Reid Worldwide Corporation is a body corporate.
2. The Defendants, Emilie Anne Reid and Reid Worldwide Corporation own Land in Alberta legally described as Plan 0020956, Lot A Excepting Thereout All Mines and Minerals (the "Reid Land").
3. The Plaintiff owns Land legally described as Plan 0020956, Lot B Excepting Thereout All Mines and Minerals (the "Lauder Land").
4. By a letter agreement (the "Agreement") made on or after January 7, 2016, the Plaintiff and the Defendants entered into an emergency access Agreement whereby the Defendants agreed to grant the Plaintiff authorization to access a road on the Reid Lands as an emergency access for the Plaintiff's sub-division located on the Lauder Lands.
5. Despite demand the Defendants have failed or refused to execute the agreed to authorization.
6. The Plaintiff has preformed the Plaintiff's part of the Agreement and despite demand the Defendants have failed or refused to sign the required authorization.

Form 10
[Rule 3.25]

7. The Plaintiff filed a Caveat against Title to the Reid Land on November 16, 2016 claiming an interest in the Reid Land pursuant to the Agreement.

Remedy sought:

8. Wherefore the Plaintiff claims against the Defendants:
9. An Order in the nature of specific performance requiring the Defendants to execute the authorization required by the Agreement.
10. A Declaration that the Caveat is valid and subsisting.
11. Costs of this Action.

NOTICE TO THE DEFENDANTS

You only have a short time to do something to defend yourself against this claim:

30 days if you are served in Alberta

1 month if you are served outside Alberta but in Canada

2 months if you are served outside Canada.

You can respond by filing a statement of defence or a demand for notice in the office of the clerk of the Court of Queen's Bench at Edmonton, Alberta, AND serving your statement of defence or a demand for notice on the plaintiff's address for service.

WARNING

If you do not file and serve a statement of defence or a demand for notice within your time period, you risk losing the lawsuit automatically. If you do not file, or do not serve, or are late in doing either of these things, a court may give a judgment to the plaintiff(s) against you.