



COURT FILE NUMBER 1703 00252

COURT COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE EDMONTON

PLAINTIFF(S) LAUDER INDUSTRIES INC.

DEFENDANT(S) EMILIE ANNE REID and REID  
WORLDWIDE CORPORATION

DOCUMENT STATEMENT OF DEFENCE

PARTY FILING THIS  
DOCUMENT EMILIE ANNE REID and REID WORLDWIDE CORPORATION

ADDRESS FOR  
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File No.: 30861-6

**Statement of facts relied on:**

1. The Defendants, Emilie Anne Reid and Reid Worldwide Corporation (the "Defendants") admit paragraphs 1 to 3 of the Statement of Claim filed herein and adopts the definitions set out therein.

**Any matters that defeat the claim of the Plaintiff:**

2. The Defendants, deny each and every other allegation contained in the Statement of Claim and put the Plaintiff, Lauder Industries Inc. ("Lauder") to the strict proof thereof.
3. The Defendants deny having entered into the letter agreement as alleged in paragraph 4 of the Statement of Claim, or at all. At most, the Defendants agreed to grant Lauder a licence to cross the Reid Land.
4. At no time did the Defendants intend to grant Lauder an interest in the Reid Land as required for the caveat registered on November 16, 2016 as registration no. 162 323 015 (the "Caveat").

5. The Defendants provided an authorization as contemplated in the letter dated January 7, 2015 to the County of Wetaskiwin No. 10 on, or around, November 26, 2015.
6. The Defendants have refused and continue to refuse to provide an executed easement agreement in favour of the County of Wetaskiwin No. 10 as that is the granting of an interest in land which was never intended and is contrary to the intention of the Defendants to grant a licence if in favour of Lauder only.

**Remedy sought:**

7. That the Plaintiff's claim be dismissed against the Defendants;
8. An Order discharging the Caveat;
9. A declaration that the Plaintiff was not granted an interest in the Reid land;
10. Costs of this action; and
11. Such further and other relief as this Honourable Court deems appropriate.