**COURT FILE NUMBER** 

1701-17295

COURT

**QUEEN'S BENCH OF ALBERTA** 

JUDICIAL CENTRE

**CALGARY** 

**PLAINTIFFS** 

KAYSHA FAITH RICHARDSON

**DEFENDANTS** 

RONALD WILLIAM SCHAFER

**COURT FILE NUMBER** 

2001-14323

COURT

**QUEEN'S BENCH OF ALBERTA** 

JUDICIAL CENTRE

CALGARY

**PLAINTIFFS** 

KAYSHA FAITH RICHARDSON

**DEFENDANTS** 

**COLBY CHRISTOPHER WALLACE** 

AND COLBRAY HOMES LTD.

**COURT FILE NUMBER** 

2001-16974

COURT

QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE

**CALGARY** 

**PLAINTIFFS** 

DAVE DERY and KAYSHA FAITH DERY also known

as KAYSHA FAITH RICHARDSON

**DEFENDANTS** 

CHRISTOPHER GRANT JORGENSON AND

ASHELEY MAE JORGENSEN

**DOCUMENT** 

**AFFIDAVIT** 

**ADDRESS FOR** SERVICE AND CONTACT **INFORMATION OF PARTY FILING THIS** DOCUMENT

KAYSHA FAITH RICHARDSON

C/O DALE J. RICHARDSON 1292 95th St., North battleford SK,

S9A 0G2

Tel: 306-441-7010 Fax: 639-630-2551

Email: unity@dsrkarisconsulting.com

Clerk's Stamp

CLERK OF THE COURT FILED

SEP 16 2022

JUDICIAL CENTRE OF CALGARY

#### **AFFIDAVIT OF DALE RICHARDSON**

- I, **Dale J. RICHARDSON**, of the City of North Battleford, in the Province of Saskatchewan, affirm to the best of my knowledge as follows:
  - I have personal knowledge of the matters and facts deposed to in this affidavit. The
    information set out in this affidavit is true to the best of my knowledge and belief,
    except where stated to be on information learned from someone else and where that
    is stated, I believe the information to be true.
  - 2. I was under my family doctor's orders not to participate in any court matters due to anxiety and the physical symptoms that I have experienced in the course of my litigation with the defendants in the various court actions that have severely contributed to the increased levels of anxiety. The period of time given to me was about 90 days from April 1, 2022. The reasons for this need for a break to take care of my health are apparent in the attached exhibits. (See Exhibit A: Family Doctor's Letters to Court and School)
  - 3. I acting as agent of DSR Karis Consulting Inc. have provided a copy of the engineering report titled "THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK)" to the Attorney General of Alberta the Honourable Tyler Shandro and to the MLA for the riding of the extra provincially registered office in Alberta for DSR Karis Consulting Inc., the Honourable Leela Aheer. I acting as agent of DSR Karis Consulting Inc. provided a letter to the aforementioned ministers in the Alberta legislative Assembly. (See Exhibit B: Letter Sent to Attorney General of Alberta and Leela Aheer and confirmation of Delivery)

- 4. The report and letter sent to the Attorney General of Alberta and the Honourable Leela Aheer outlined the national security risk to Canada and the United States based on criminally negligent engineering guidelines that were a critical weakness that were used to exploit a weakness that interfered with the territorial integrity of Canada and the United States. Every measure that arose from the suppression of the information is a product of criminal negligence. The suppression of the research has adversely affected the economic security of Alberta and resulted in loss of life and other negative effects. (See Exhibit B: Letter Sent to Attorney General of Alberta and Leela Aheer and confirmation of Delivery and Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- I have witnessed Derek Allchurch used deception in other court matters for financial gain. Exhibit D:
- 6. I have witnessed Derek Allchurch bring Astra Richardson-Pereira before Associate Chief Justice Rooke to withdraw as counsel with Nabeel Peermohamed acting as counsel for Shopper's Drug mart in the action. Derek Allchurch withdrew as counsel the day before the trial and Nabeel Peermohamed wanted to proceed with the trial against my sister Astra Richardson-Pereira who is suffering from a brain injury from the MVA without counsel. (See Exhibit C: Pipella Law – Nabeel – Rooke - SGI – DSR Karis Consulting Inc. Connection)
- 7. In October of 2020, Nabeel Peermohamed and Derek Allchurch came to an agreement on the slip and fall for Astra Richardson-Pereira to assume 75% liability and have shoppers assume 25% liability. Tara Pipella and Derek Allchurch told Astra Richardson-Pereira of the agreement days before the trial and pressured her

- to take the deal. (See Exhibit C: Pipella Law Nabeel Rooke SGI DSR Karis Consulting Inc. Connection)
- 8. According to the professional advice given by James A. Richards of Slater Vecchio a BC injury law firm, the outcome of the MVA would be affected by the outcome of the slip and fall action to be litigated by Nabeel Peermohamed before Associate Chief Justice Rooke. James A. Richards stated that the MVA and the slip and fall were related and a reduction in the liability of the slip and fall could reduce the liability of the opposing parties in the MVA potentially reducing Astra Richardson-Pereira's payout in the MVA by 75% if she agreed to the deal Derek Allchurch and Tara Pipella were pressuring her into. (See Exhibit C: Pipella Law Nabeel Rooke SGI DSR Karis Consulting Inc. Connection)
- 9. Nabeel Peermohamed was representing SGI and its agent Jordan Ottenbreit in T-1115-20 in an action brought forth by DSR Karis Consulting Inc.. Kaysha Richardson is the Chief Communication Officer of DSR Karis Consulting Inc. and had to flee for asylum to the United States after being abducted and tortured to extract corporate information on July 23, 2020 along with myself. We were both abducted and taken to separate facilities owned and operated by the Saskatchewan Health Authority and tortured to extract corporate information relating to DSR Karis Consulting Inc., presumably for DSR Karis Consulting Inc. bringing the action against the Saskatchewan Health Authority relating to the criminally negligent guidelines used in the implementation of the SARS-Cov-2 pandemic response. (See Exhibit C: Pipella Law Nabeel Rooke SGI DSR Karis Consulting Inc. Connection and Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))

- 10. Astra Richardson-Pereira is the agent for service of DSR Karis Consulting Inc.'s Alberta office which is located at 116 West Creek Meadow Chestermere, AB. This is also the location of Astra Richardson-Pereira's residence. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 11. Nabeel Peermohamed acting as agent for SGI in the DSR Karis Consulting Inc. matter and in the slip and fall against the agent of DSR Karis Consulting Inc., Astra Richardson-Pereira that would affect a matter involving litigation with Astra Richardson-Pereira and how much SGI would have to pay out in that matter is an extreme conflict of interest and should have not been done. (See Exhibit C: Pipella Law Nabeel Rooke SGI DSR Karis Consulting Inc. Connection)
- 12. Derek Allchurch's litigation with DSR Karis Consulting Inc. and myself are also matters of interest, especially since Derek Allchurch and the opposing counsel in T-1404-20 financially benefited from committing fraud in the Federal Court of Canada by using fraudulent shareholder information of DSR Karis Consulting Inc. to obtain a section 40 vexatious litigant order against myself, DSR Karis Consulting Inc., and Robert A. Cannon. The wording of the order was designed to prevent anyone from bringing any complaint related to that matter, and my children would be barred from seeking remedy in the event of my death, or the shareholder of DSR Karis Consulting Inc. would be prevented from seeking remedy for being defrauded. The shareholder of DSR Karis Consulting Inc. is listed on the corporate registry in Alberta and is on the public record. This is clear evidence that Derek Allchurch has

- used crimes in the court for financial gain. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 13. Derek Allchurch, Tara Pipella, Nabeel Peermohamed, and SGI all benefited from the suppression of the research, while the province of Alberta suffered economic and other harm from the suppression of the research. (See Exhibit C: Pipella Law – Nabeel – Rooke - SGI – DSR Karis Consulting Inc. Connection and Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 14. Associate Chief Justice Rooke is directly responsible for suppression of the report in the province of Alberta and is directly responsible for all of the losses incurred as a result of the suppression including the loss of life. (See Exhibit B: Letter Sent to Attorney General of Alberta and Leela Aheer and confirmation of Delivery and Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 15. Associate Chief Justice Rooke has punished Kaysha Richardson for an application under that Hague convention that was submitted to stop the trafficking of Kaysha Richardson's sister and exercise her rights under the Hague Child Abduction convention. (Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))

- 16. Associate Chief Justice Rooke punished me for trying to present the engineering report to the Court of Queen's Bench for Alberta to stop the criminal activity contained with the documentation which includes without limitation, child trafficking for the purposes of financial and sexual exploitation, fraud, mortgage fraud, tax fraud, bioterrorism, treason, the crime of aggression and crimes against humanity. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 17. Derek Allchurch had an agreement with the review office in Alberta for costs for the matter for Astra Richardson-Pereira and when he was not satisfied went to get a charging lien against her in the Supreme Court of British Columbia asking for the value that was rejected by the review officer in Alberta. Exhibit C: Pipella Law Nabeel Rooke SGI DSR Karis Consulting Inc. Connection
- 18. Derek Allchurch went to get a charging lien against Astra Richardson-Pereira's son Isaiah Richardson-Pereira in the Supreme Court of British Columbia and Derek Allchurch used fraudulent means to obtain the charging lien, which is for financial gain. Deception of any kind to obtain financial gain is a crime.
- 19. Associate Chief Justice Rooke punished Astra Richardson-Pereira for asking the counsel in T-1404-20 and Jessica Karam acting for the Attorney General of Canada from harassing me when my family doctor provided a medical note giving me a period of 90 days from Court matters to look after my medical issues. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))

- 20. Jessica Karam acting with the capacity of the Attorney General of Canada interfered in a matter under provincial jurisdiction in the Court of Queen's Bench for Alberta and lied and used a fraudulent order that is being used to traffick Karis Kenna Nicole Richardson my three and a half year old daughter to shield the rogue agents of the Royal Canadian Mounted Police who abducted my daughter Kaysha Richardson and me on July 23, 2020 as we attempted to enter the Court of Queen's Bench for Saskatchewan in the Judicial Centre of Battleford and took us to separate facilities owned and/or operated by the Saskatchewan Health Authority to be tortured. Justice Karen Horner was presented evidence that the Attorney General of Canada lied and said that I lost custody without prejudice and was arrested. I presented an affidavit submitted by the RCMP in T-1404-20 and photographic and transcript and affidavit evidence that demonstrated that I was arrested before the order was made. I was never given a chance to present my case and Justice Karen Horner dismissed the case. Associate Chief Justice Rooke seized the matters after an emergency application for a writ of mandamus was denied to get arrest warrants issued from the torture files that were issued on July 3, and 7th of 2020 that were never dealt with and to stop the persecution and torture that my daughters, my family and I were subjected to. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 21. Associate Chief Justice Rooke allowed the Attorney General of Canada to bring vexatious proceedings and tried to imply that I was a crazy violent black man who had no ability to write anything that made sense and barred my lawful access to the courts. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))

- 22. Associate Chief Justice Rooke ignored letters from myself and several of my family members that demonstrated that the information presented by the Attorney General of Canada was a lie and that the "interim orders" issued by Justice R.W. Elson in the Court of Queen's Bench for Saskatchewan were obtained by kidnapping, torture and terrorism. The order itself was explicit evidence of child trafficking for the purpose of financial exploitation. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 23. Associate Chief Justice Rooke ignored evidence of mortgage fraud perpetrated in the following courts without limitation, the Court of Queen's Bench for Saskatchewan, Court of Appeal for Saskatchewan and the Federal Court of Canada that was used for the express purpose of disrupting the essential services of DSR Karis Consulting Inc. that caused harm in clauses (A)-(C) in section 83.01(b)(ii) of the Criminal Code. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 24. Many of the crimes that were mentioned in the attached documentation require conspiracy to commit them and would be impossible for a single person to commit them. Treason is an example of such a crime. It is impossible to commit treason without conspiracy, organized crime is also impossible without conspiracy. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))

- 25. A full report must be written, as the preliminary reports were written under extreme duress of torture and persecution. It is in the public interest for a full report to be written. See Exhibit A: Exhibit D:
- 26. All the matters involving Derek Allchurch, Tara Pipella, Nabeel Peermohamed, Astra Richardson-Pereira, Kaysha Richardson and myself are all related and any other matter that is tied to the engineering report in the affidavit or the authors/ contributors in the province of Alberta and must be examined in its totality. See Exhibit A: Exhibit D:
- 27. There were patterns identified in the statistical analysis of the engineering report that are related to these matters and must be considered. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 28. I am the only expert in these matters qualified to create such a report as it is based on research that I pioneered and it is protected by copyright of three persons, and I have a unique understanding, knowledge and familiarity with the events. Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK)
- 29. No lawyer is capable of properly representing the engineering guidelines and it is probable that based on the previous history that lawyers may be intimidated into not taking this matter. Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK)

- Derek Allchurch and Tara Pipella have taken steps to frustrate attempts of Astra Richardson-Pereira and Kaysha Richardson to obtain counsel.
- 31. I have pioneered research into SARS-Cov-2 infection controls relating to Heating, Ventilation, and Air Conditioning during the course of my Bachelor of technology Engineering and Applied Science major at Memorial University, and my degree is focused on researching and implementing technologies. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK)
- 32. The research that I have pioneered is scheduled to be published later this year.
- 33. I am the most qualified person to speak on the research that I have conducted. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 34. Assessing risk is an integral part of my training as a Mechanical Engineering Technologist, Bachelor of Technology with an Engineering and Applied Science Major, my research, and any work associated with my training. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 35. Based on what I have observed with the emergence of the Monkeypox contagion that in the course of my research, it is my expert opinion that the province of Saskatchewan is not equipped to mitigate this contagion based on the fact that there

is no basis for its issuance of its representation of the Aerosol Generating Medical Procedures guidance. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))

- 36. I know that faulty infection controls do not discriminate against who they affect, the defendants have loved ones and family that could be affected by this emerging contagion that can have up to a 33% fatality rate as cited in peer reviewed research, my actions are to help them as much as anyone else, because I believe it when the Bible tells me to love my enemies, and regardless of what they think of me I am acting in this matter to help anyone who needs the help, and at this time, based on my research, I know that innocent lives are at risk. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 37. On July 23, 2020 I was acting on behalf of DSR Karis Consulting Inc. to litigate against the Saskatchewan Health Authority and several other parties including without limitation, the Royal Canadian Mounted Police, Chantalle Thompson, Jennifer Schmidt, Mark Clements, Chad Gartner, Brad Appel, Ian McArthur, Bryce Bohun, and Cary Ransome at the Court of Queen's Bench for Saskatchewan in the Judicial Centre of Battleford in litigation related to table S-31 issued by the SHA for Aerosol Generating Medical Procedures guidance. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))

- 38. I was arrested by the RCMP as I attempted to enter the Court of Queen's Bench for Saskatchewan on July 23, 2020 before the hearing. I was never able to litigate for the matter for DSR Karis Consulting Inc., nor was I able to represent myself for my family matter that was scheduled for that day. Both matters were first appearances. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 39. I have never had an opportunity to litigate any matter on its merits in any court that I have ever been in. It is in the public interest to hear the matters that I have brought before the courts when the evidence I have presented to the courts demonstrate that people's lives are at risk because of the actions of the Saskatchewan Health Authority. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 40. I have received an access to information request from the Ministry of Health for Saskatchewan on May 10, 2022 that informed me that there was no scientific justification for their implementation of Table S-31, nor was there any risk assessment or occupational health and safety report for the implementation of engineering guidelines, and this is poor engineering practice. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 41. The Saskatchewan Health Authority are putting lives at risk and the threat to the public is extremely high when considering the factors with the emerging Monkeypox threat, and the threats outlined are included in the report attached to this affidavit.

One unusual aspect of this emerging Monkeypox event is the countries in which the cases are occurring which are outside the normal areas of infections, which suggests that an abnormal mode of transmission is taking place i.e. aerosols. This is compounded with the knowledge that Monkeypox is a contagion that has been studied in level 4 labs for the purpose of studying aerosol transmission. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))

- 42. When designing for human beings, the greatest care must be taken, and over-designing must occur, because human life is not replaceable. For example, if an elevator is rated to lift 2000 pounds, it must be designed to life 20,000 pounds if it is carrying human beings. This is applicable to infection controls, as it is imperative to ensure that infection controls are going to be effective. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 43. It is my opinion that the Saskatchewan Health Authority had no basis in which to proceed with any sort of vexatious litigation when they are defending the right to kill Saskatchewan residents with admittedly criminally negligent guidelines, issued using no engineering practice and have done a grave injustice to the people of Saskatchewan. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 44. I believe that the bulk of the persecution, torture and other crimes that I have been subjected to is because of my political opinion and whistle-blowing of the poor risk

assessment and the risk arising from it and the threat to the general public. There are other factors that have affected how some of the criminal actions were taken out on me such as my race and religion. However, this is a matter that many other people regardless of race or religion have been persecuted and suppressed for speaking against the political position of their respective governments. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))

- 45. I am aware that other provinces in Canada are using these negligence guidelines and this issue must be rectified before thousands of people die or in a worst case scenario, millions of Canadians die, and peer reviewed studies suggests that children are more affected by Monkeypox than adults. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 46. The problem with the guidelines is not when it is put into the hands of an engineer or technologist; they are trained to search for answers when information is complete. The issues arises when incompetent persons are being handed the incomplete guidelines that they do not understand. I have presented evidence of such a case and nothing was done. Without a competent person examining the infection controls it is impossible to determine whether the systems are going to work or not. I could identify a number of things wrong with the case presented in the report. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))

- 47. The distribution of the guidelines will disproportionately affect small businesses as they are unlikely to call an engineer or technologist, and this is compounded by financial duress, stress, fear, low worker morale, anxiety, uncertainty, the state of the economy and a long list of uncertainties today. These are things that should have been accounted for by the Saskatchewan Health Authority, yet no mention was made about this from the manager of risk. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 48. The current engineering guidelines are a disaster waiting to happen and with the emergence of Monkeypox, a disease with a high fatality rate it is coming to our doorstep and there is little to no preparation for it. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 49. This vexatious litigation initiated by the Saskatchewan Health Authority has cost the lives of the public when they are using guidelines that will most certainly kill people and serve to spread contagions. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 50. DSR Karis Consulting Inc. is a federal corporation registered to operate in the jurisdiction of Saskatchewan and Alberta. It was incorporated federally on April 1, 2020 with its registered office located at 1292 95<sup>th</sup> Street, North Battleford Saskatchewan. DSR Karis Consulting Inc. was registered extra-provincially in Alberta in August of 2020, and the shareholder information is submitted to the

corporate registry in Alberta as a part of the annual returns. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))

- 51. I do not own any shares of DSR Karis Consulting Inc. and therefore it is not "my company" as multiple documents have fraudulently stated to obtain orders against me, DSR Karis Consulting Inc. and others. Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK)
- 52. DSR Karis Inc. owns 100% of the shares of DSR Karis Consulting Inc. making it the owner of the "company" that was fraudulently represented as being mine. This information can be obtained on the corporate registry of Alberta. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 53. DSR Karis Consulting Inc. was never part of any action that I personally was a part of. Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK)
- 54. DSR Karis Consulting Inc. and I have made separate criminal complaints relating to the Bioterrorism and any parties who have supported them both domestically and internationally, and the parties who have been complained are currently under

- investigation for the same. (See Exhibit D: THE ENGINEERING OF
  BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF
  AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 55. I have been deprived of a right of defence in the Court of Queen's Bench for Saskatchewan from the first hearing on July 23, 2020 all the way through and the evidence contained in this affidavit will demonstrate this.
- 56. Evidence demonstrates that Patricia J. Meiklejohn has been conspiring to defraud me, torture me and kill me from June of 2020. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 57. Evidence demonstrates that Kimberley A. Richardson has been complicit in and/or conspiring with Patricia J. Meiklejohn and others to defraud me, torture and kill me from 2020. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 58. Evidence in this affidavit demonstrates that I have never received due process in any Court that I have been in demonstrating complete diversity with respect to corruption.

  (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 59. Evidence that has been placed before the Court demonstrates that multiple agents in multiple courts have lied and placed me in a position of extreme prejudice to ambush me and deprive me of rights. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))

- 60. Whenever the evidence relating to the Aerosol Generating Medical Procedures guidance is presented before a court a similar reaction is made. Actions are taken to malign me in some way to ignore the evidence. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 61. A brief statistical analysis has suggested that there is a potential correlation between submitting the evidence of the criminally negligent guidelines and the crimes used to prevent its reporting and negative out comes in court hearings. The preliminary analysis which is part of the discussion on risk in a larger study has identified some disturbing trends. There has been an alarming amount of orders issued based on statements that are not factual. Many of the statements contradict evidence that are submitted by the opposing counsel in the numerous actions. For example, on July 23, 2020 Justice R.W. Elson issued orders relating to custody and the sale of a home on a first appearance in a divorce hearing after instructing the RCMP to keep me out of the court. This was called a lawful order of the court when it was not so. No evidence was ever provided to demonstrate any justification for any such order as the law does not permit this. Yet this was used to justify lawful challenges to the order. Another concerning trend is the fraudulent shareholder information regarding DSR Karis Consulting Inc. that was used to obtain orders against several persons when no evidence was ever provided by the parties who brought that claim. The validity of the shareholder information was easily obtainable on the public record from the province of Alberta. More discussion in Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK).
- 62. The timing of events suggests a relationship consisting of a pattern that seems to be unfavourable to any person who has agreed with my political opinion relating to AGMP's guidance in the SARS-Cov-2 pandemic. This pattern is very unfavourable to

- persons with respect to legal matters. This warrants further study. See Exhibit D:

  THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND

  THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND

  ANALYSIS OF RISK)
- 63. An examination of the differences in the custody matters between my oldest daughter Kaysha Richardson who was a permanent ward of Winnipeg Child and Family Services ("CFS") and Karis Kenna Nicole Richardson who is the subject of a family dispute. In 2000, I submitted a 15 page letter and was able to have CFS reverse their position. As of May of 2022 the Attorney General of SK was in possession of 673,000 pages of evidence relating to the matters surrounding Karis and I am unable to get even 1 picture of Karis. This is a 4,486,667% increase in the amount of evidence provided and it has yielded no rulings in my favour or any reasonable access to Karis. 4,486,667% is a substantial increase in the evidence provided. Further investigation is warranted. See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK)
- 64. Another alarming relationship is the reaction of any member of the judiciary or court official who is presented with the engineering guidelines. It is treated as if it does not exist, direction is used to remove it off the court record, evidence is struck, evidence is sent back, rule contravention is inconsistently applied, when it is in the public interest to have evidence that suggests that members of the public are being killed from poor engineering guidelines relating to the SARS-Cov-2 pandemic. This relationship warrants further study. See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK)

- 65. The actions of any counsel or judge that has had any connection to me or any of the corporations that I represent or any of my family or affiliates should be investigated as the evidence suggests that my family members have been affected by the negative outcomes. A preliminary examination of the evidence suggests a high degree of bias against me. This demands further study. See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK)
- 66. The registered office of DSR Karis Consulting Inc. in Alberta is located at 116 West Creek Meadow Chestermere AB, which is also the residence of Astra Richardson-Pereira. Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK).
- 67. Astra Richardson-Pereira is the person listed for service of documents for DSR Karis Consulting Inc. in Alberta. Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK)
- 68. Defendants in T-1404-20 obtained a favourable outcome by fraud and other crimes in T-1404-20 in the Federal Court of Canada in a matter that I initiated against him. One of the crimes was using fraudulent shareholder information of DSR Karis Consulting Inc. to obtain the favourable outcome. The shareholder information was on the public record and it was demonstrated that the shareholder information used in multiple orders and motions does not match the certified securities register from DSR Karis Consulting Inc. or certified documentation from the Alberta corporate registry. The Alberta corporate registry and DSR Karis Consulting Inc.'s shareholder

- information agree with each other. Exhibit D: THE ENGINEERING OF
  BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF
  AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK).
- 69. The research regarding SARS-Cov-2 that I pioneered that is covered by copyrights that are owned by myself, DSR Karis Consulting Inc. and DSR Karis North Consulting Inc. a Delaware corporation are at the root of the matter. It demonstrates how existing guidelines used for the SARS-Cov-2 can be used to distribute a biological weapon and interfere with the territorial integrity of Canada and the United States. Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK)
- 70. I believe based on the pattern of events over the last two and a half years as outlined in the documentation, any person connected to me or the research has been targeted for punishment. The connection to the matters of counsel in this affidavit demonstrates that there is reason for concern.
- 71. There should be an investigation into the events based on the serious nature of the criminal activities. The risk is too great to not investigate.
- 72. Any person who fails to investigate will be responsible for killing people.
- 73. It is statistically impossible that I could lose 100% of the court matters that I took to court in multiple jurisdictions in multiple countries. In many cases the opposition did not show up and I still lost. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 74. The "order" given to sell the home was given by Justice R.W. Elson on July 23, 2020 on a first appearance, after Justice R.W. Elson had by the testimony of unknown

- members of the RCMP swore in that he directed them to keep me out of the Court of Queen's Bench for Saskatchewan in the Judicial Centre of Battleford for the matters I was scheduled to appear on July 23, 2020. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 75. I was to appear as a respondent in DIV 70 of 2020 a family matter and as a plaintiff for QBG-156 of 2020 for DSR Karis Consulting Inc.. QBG-156 of 2020 was related to the failure of the RCMP to investigate the criminal negligence complaints tied to the negligent guidelines and poor risk assessment used in implementing the SARS-Cov-2 pandemic response. The SHA was also a defendant in QBG-156 of 2020. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 76. I never was permitted to enter the Court of Queen's Bench for Saskatchewan in the Judicial Centre of Battleford on July 23, 2020. I and my oldest daughter were arrested attempting to enter the court at about 9:50 am on July 23, 2020. This is also confirmed by an affidavit of an unknown member of the Battlefords RCMP. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 77. The PACT team showed up at my house on July 22, 2020 with several members of the Battlefords RCMP. The persons in attendance were, Tonya Browarny, Ken Startup, Cst. Rivest and Cst. Reid. Ken Startup wanted to speak with Kaysha Richardson, however, I did not permit him to speak with her. I served the members present of the RCMP for the hearing the next day as they were denying me entrance to the Battlefords detachment to serve them for QBG-156 of 2020. I shut the door

- and locked it after. I was never directed to submit to a medical examination by anyone. Tonya Browarny's notes present in my medical records corroborate this fact. (See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 78. The Attorney General of Canada has refused service to try to thwart my efforts to have their crimes exposed. For two and half years I have been suppressed in silence. I am tired of this and I want to be left alone. The actions that I have witnessed are so evil that it would shock the senses of the general public. Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK)
- 79. It can be demonstrated that the rogue agents in the Saskatchewan Courts are corrupt and have been involved in criminal activity. (Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK))
- 80. I am terrified of what the rogue agents of the Attorney General of Canada, Attorney General of SK and other parties will do to me and my family if something isn't done. I believe that I will be tortured and killed. I was horrified that the Attorney General of Canada would use my three year old child as a shield for their crimes.
- 81. I am being punished by multiple courts for telling the truth and complaining of torture.
  The Federal Court of Appeal is attempting to cover up the criminal activity in the
  Federal Court of Canada. I am tired and exasperated of the extreme prejudice that I

- am being subjected to by the courts. Exhibit D: THE ENGINEERING OF
  BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF
  AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK)
- 82. The parties that have hindered my court actions are all directly responsible for the situation that occurred in Ottawa. It is a reasonable conclusion that there would have been no protest in Ottawa in February of 2022 if the events relating to COVID-19 came to light in the numerous cases that I had brought before the Saskatchewan and Federal Courts. The parties are directly responsible for the deaths of Canadians and Americans resulting from the deliberate misrepresented guidelines that creates unknown failures to spread the COVID-19. Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK)
- 83. I have not had any of the accused in the matter respect my rights, and in fact I have been forced to deal with the people who I have made criminal complaints against over and over again allowing them to use their position to punish me for making complaints against them. See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK).
- 84. I have been treated like less than a person and the actions of forcing me to deal with persons who I have made serious criminal complaints against demonstrates that I have been effectively stripped of all rights by the state and have less rights than a slave. See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK).

- 85. Associate Chief Justice Rooke is abusing his position and using the civil court to shield crime. The preliminary statistical analysis supports this assertion. The correlation between child trafficking, the engineering report and negative outcomes in my court matters are compelling evidence that corruption is taking place. See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK).
- 86. Chambers hearings off the record are where the greatest abuses occurs. These matters have to be done in open court for the public to witness what is occurring in the court cases, as I have had all my rights stripped from me and lies were presented by parties in the judiciary without evidence. See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK).
- 87. The corporate registry in Alberta demonstrates that the Attorney General of Canada, Attorney General of SK and all of the counsel in T-1404-20 committed fraud for financial gain in the Federal Court of Canada. Lies about me owning DSR Karis Consulting Inc. were used to obtain financial gain and I am not the shareholder of DSR Karis Consulting Inc., and the owner of 100% of the shares is listed on the public corporate registry in Alberta. No evidence was presented of that and now I am having to deal with the people who have been exposed for their criminal fraud in the civil court to try to get remedy. This situation is the worst abuse I have ever faced in my life. I have been continually subjected to deal with people in the judicial system who were actively committing crimes against me to try and get justice. See Exhibit D:

THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK).

- 88. I have been targeted by Jessica Karam and have had her spread lies and unsubstantiated claims without any evidence. The evidence that I have presented has continually been disregarded in favour of those who have no evidence. I have been the only dark skinned black person in all of the matters that I have litigated in face to face. It is likely that racism is a factor in these decisions. See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK).
- 89. It is impossible for someone to pay in excess of 6.7 million dollars in legal fees if they cannot afford a house costing \$170,000.00. It is proof of criminal activity and from a risk assessment standpoint it is probable that counsel for Kimberley A. Richardson wanted the division of property put over sine di in the divorce to avoid having to demonstrate where the \$6.7 million dollars in legal fees came from. See Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK).
- 90. This affidavit demonstrates the need for a full copy of the report to be created because the public interest demands it.
- 91. This affidavit demonstrates the need for my intervention in this matter as lives depend on it.
- 92. I attest that the information contained in the documents contains material facts that are true to the best of my knowledge.
- 93. Attached exhibits:

Exhibit A: Family Doctor's Letters to Court and School

Exhibit B: Letter Sent to Attorney General of Alberta and Leela Aheer and confirmation of Delivery

Exhibit C: Pipella Law – Nabeel – Rooke - SGI – DSR Karis Consulting Inc. Connection

Exhibit D: THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK)

Dale Richardson

Notary Public

Affirmed before me at the City of Chestermere, in the Province of Alberta, in the Country of

Canada, this 14th day of September, 2022.

ANDREW G. KEIRSTEAD

Barrister, Solicitor and Notary Public

CONTACT INFORMATION AND ADDRESS FOR SERVICE

Dale Richardson; 1292 95th Street, North Battleford SK S9A 0G2; Telephone number: (306)

441-7010; Email address: unity@dsrkarisconsulting.com

# EXHIBIT A: FAMILY DOCTOR'S LETTERS TO COURT AND SCHOOL

This is Exhibit "A" referred to in the
Affidavit of

Sworn before me this day
of A.D. 20

A Commissioner for Oaths in and for
the Province of Alberta

ANDREW G. KEIRSTEAD Barrister, Solicitor and Notary Public





#### Richardson, Dale James <djrichardson@mun.ca>

### classes

Richardson, Dale James <djrichardson@mun.ca> To: "Registrar, MI (Degree programs)" <mi\_registrar@mun.ca> Mon, Apr 4, 2022 at 4:19 PM

Hi,

I have attached a letter from my Doctor, and I require a medical withdrawal from the three BTECH classes that I am taking. TECH 4014-081, TECH 4012-081 and TECH4090-081. If I need to forward this information to someone else please let me know.

Regards,

Dale Richardson Student Bachelor of Engineering Technology Marine Institute of Memorial University St. Johns, NL



# Dr. Moses Ovakporaye, MD, CCFP, FCFP Clinic at Walmart, 255 East Hills Blvd SE, Calgary, AB

Phone: (403) 273-2215 Fax: (403) 273-2213

2022-Apr-01

TO WHOM IT MAY CONCERN

Patient:

Dale Richardson

PHN:

172 271 452

Birthdate:

1974-Jul-16 Age: 47 Yr

Address:

1219 95th St North Battleford, 59A 0G4 S9A 0G4

Phone:

H: (306) 441-7010 W: (000) 000-0000 C: (306) 441-7010

This patient requires Withdrawal from school for the current semester for Medical reasons

Sincerely,

M. O. Ovakporaye, MD

Prac ID: 524231108

To: The Chief Justice of the Court of Queen's Bench for Saskatchewan the Court of Queen's Bench for Saskatchewan Patricia J. Meiklejohn Kimberley A. Richardson

April 1, 2022

Attn: Registrar

### Re: DIV 70 of 2020, and any other matter relating to Dale J. Richardson

I am writing this letter to request that all matters relating to DIV 70 of 2020 including without limitation, the notice of Application for Judgment by Kimberley Richardson requesting certificate of divorce dated March 30, 2022 and a Notice of Application for Procedural Matters/ Notice of Objection by Kimberley A. Richardson, and all other matters set for April 14 2022 and to pause all future applications until I am cleared by my doctor to resume the matters and am able to provide a defense without being impeded by health issues or any other hindrances. It would be extremely prejudicial to proceed with a matter when a person is ill and cannot proceed due to medical reasons. The matters will also include the materials served to Patricia and mailed out by Monday April 4<sup>th</sup>, 2022. As this condition has affected me to the point that I have also had to withdraw from school as well. I would expect that there would be some accommodation due to illness from Kimberley Richardson for me to see my daughter who I have not been able to see for two years due to fear of torture and death traveling anywhere in Saskatchewan to a known location. I believe that compassionate accommodations are more than warranted for illness.

Dale J Richardson

## Dr. Moses Ovakporave, MD, CCFP, FCFP

Clinic at Walmart, 255 cast Her Bive of, Calgary, AB Phone: (403) 273 2215 Fax: (41 2) 273-2213

2022-Apr-01

TO WHOM IT MAY CONCERN

Patient:

Dale Richardson

PHN:

172 271 452

Birthdate: Address:

1974-Jul-16 Age: 47 Yr

1219 95th St North Battleford, S9A 0G4 S9A 0G4

Phone:

H: (306) 441-7010 W: (000) 000-0000 C: (306) 441-7010

This patient requires about 90 days to be able to participate in his legal issues due to medical reasons

Sincerely,

M. O. Ovakporaye, MD

Prac ID: 524231108

To: The Federal Court of Canada
Virgil A. Thomson
Chantelle Eisner
Jessica Karam
Marie Stack
Bruce Comba
Justin Stevenson
Elizabeth Ulmer
Jay Litman

April 1, 2022

Attn: Emily Price

### Re: T-1404-20 any other matter relating to Dale J. Richardson

I am writing this letter to request that all matters relating to T-1404-20 including without limitation, the vexatious litigant hearing scheduled for May 30, 2022 and any other matters and to pause all future applications until I am cleared by my doctor to resume the matters and am able to provide a defense without being impeded by health issues or any other hindrances. It would be extremely prejudicial to proceed with a matter when a person is ill and cannot proceed due to medical reasons. As this condition has affected me to the point that I have also had to withdraw from school as well. I believe that rescheduling when I am restored to good health is more than warranted.

Attached to this letter is a copy of my doctor's letter.

Dale J/Richardson

## Dr. Moses Ovakporave, MD, CCFP, FCFP

Clinic at Walmart, 255 cast Her Bive of, Calgary, AB Phone: (403) 273 2215 Fax: (41 2) 273-2213

2022-Apr-01

TO WHOM IT MAY CONCERN

Patient:

Dale Richardson

PHN:

172 271 452

Birthdate: Address:

1974-Jul-16 Age: 47 Yr

1219 95th St North Battleford, S9A 0G4 S9A 0G4

Phone:

H: (306) 441-7010 W: (000) 000-0000 C: (306) 441-7010

This patient requires about 90 days to be able to participate in his legal issues due to medical reasons

Sincerely,

M. O. Ovakporaye, MD

Prac ID: 524231108

To: The Supreme Court of Canada Patricia J. Meiklejohn

April 1, 2022

Attn: Registrar

Re: File no. 39960

I am writing this letter to request that all matters relating to File no. 39960 be paused or set aside and to pause all future actions until I am cleared by my doctor to resume the matters and am able to provide a defense or litigate without being impeded by health issues or any other hindrances. It would be extremely prejudicial to proceed with a matter when a person is ill and cannot proceed due to medical reasons. As this condition has affected me to the point that I have also had to withdraw from school as well. I believe that rescheduling when I am restored to good health is more than warranted.

Attached to this letter is a copy of my doctor's letter.

Dale & Richardson

## Dr. Moses Ovakporave, MD, CCFP, FCFP Clinic at Walmart, 255 Last Histo Bivo 56, Calgary, AB

Phone: (403) 273 2215 Fax: (41 2) 273-2213

2022-Apr-01

TO WHOM IT MAY CONCERN

Patient:

Dale Richardson

PHN:

172 271 452

Birthdate: Address:

1974-Jul-16 Age: 47 Yr

1219 95th St North Battleford, S9A 0G4 S9A 0G4

Phone:

H: (306) 441-7010 W: (000) 000-0000 C: (306) 441-7010

This patient requires about 90 days to be able to participate in his legal issues due to medical reasons

Sincerely,

M. O. Ovakporaye, MD

Prac ID: 524231108

To: The Court of Appeal for Saskatchewan Patricia J. Meiklejohn

April 1, 2022

Attn: Registrar

 $Re\colon CACV3745$  any other matter relating to Dale J. Richardson or that I am acting as representative for

I am writing this letter to request that all matters relating to CACV3745 and CACV3798 be paused or set aside and to pause all future actions until I am cleared by my doctor to resume the matters and am able to provide a defense or litigate without being impeded by health issues or any other hindrances. It would be extremely prejudicial to proceed with a matter when a person is ill and cannot proceed due to medical reasons. As this condition has affected me to the point that I have also had to withdraw from school as well. I believe that rescheduling when I am restored to good health is more than warranted.

Attached to this letter is a copy of my doctor's letter.

Dale J Richardson

## Dr. Moses Ovakporave, MD, CCFP, FCFP

Clinic at Walmart, 255 cast Her Bive of, Calgary, AB Phone: (403) 273 2215 Fax: (41 2) 273-2213

2022-Apr-01

TO WHOM IT MAY CONCERN

Patient:

Dale Richardson

PHN:

172 271 452

Birthdate: Address:

1974-Jul-16 Age: 47 Yr

1219 95th St North Battleford, S9A 0G4 S9A 0G4

Phone:

H: (306) 441-7010 W: (000) 000-0000 C: (306) 441-7010

This patient requires about 90 days to be able to participate in his legal issues due to medical reasons

Sincerely,

M. O. Ovakporaye, MD

Prac ID: 524231108

To: The Federal Court of Appeal Canada Cheryl Giesbrecht

April 1, 2022

Attn: Registrar

Re: T-1367-20 (transfer of Federal Court of Appeal file A-239-20)

I am writing this letter to request that all matters relating to T-1367-20 be paused or set aside and to pause all future actions until I am cleared by my doctor to resume the matters and am able to provide a defense or litigate without being impeded by health issues or any other hindrances. It would be extremely prejudicial to proceed with a matter when a person is ill and cannot proceed due to medical reasons. As this condition has affected me to the point that I have also had to withdraw from school as well. I believe that rescheduling when I am restored to good health is more than warranted.

Attached to this letter is a copy of my doctor's letter.

Dale J Richardson

## Dr. Moses Ovakporave, MD, CCFP, FCFP

Clinic at Walmart, 255 cast Her Bive of, Calgary, AB Phone: (403) 273 2215 Fax: (41 2) 273-2213

2022-Apr-01

TO WHOM IT MAY CONCERN

Patient:

Dale Richardson

PHN:

172 271 452

Birthdate: Address:

1974-Jul-16 Age: 47 Yr

1219 95th St North Battleford, S9A 0G4 S9A 0G4

Phone:

H: (306) 441-7010 W: (000) 000-0000 C: (306) 441-7010

This patient requires about 90 days to be able to participate in his legal issues due to medical reasons

Sincerely,

M. O. Ovakporaye, MD

Prac ID: 524231108

To: The Court of Queen's Bench for Alberta Chief Justice Mary T. Moreau Associate Chief Justice Rooke Jessica Karam Patricia J. Meiklejohn Unknown Calgary Police counsel

April 1, 2022

Attn: Registrar, Chief Justice Mary Moreau and Associate Chief Justice Rooke

Re: 2201 02896 and 2201 03422

I am writing this letter to request that all matters relating to 2201 02896 be paused and set aside including the Court Access Restrictions Order. This is to not prejudice me from having to be beyond an appeal period and subjecting me to having to ask for leave for something that I have a right of appeal for. If this is not done then an ill disabled man will be placed in a position of extreme prejudice. I am requesting a pause on all future actions until I am cleared by my doctor to resume the matters and am able to provide a defense or litigate without being impeded by health issues or any other hindrances. It would be extremely prejudicial to proceed with a matter when a person is ill and cannot proceed due to medical reasons. As this condition has affected me to the point that I have also had to withdraw from school as well. I believe that dealing with the matters when I am restored to good health is more than warranted.

Attached to this letter is a copy of my doctor's letter.

Dale & Richardson

## Dr. Moses Ovakporave, MD, CCFP, FCFP

Clinic at Walmart, 255 cast Her Bive of, Calgary, AB Phone: (403) 273 2215 Fax: (41 2) 273-2213

2022-Apr-01

TO WHOM IT MAY CONCERN

Patient:

Dale Richardson

PHN:

172 271 452

Birthdate: Address:

1974-Jul-16 Age: 47 Yr

1219 95th St North Battleford, S9A 0G4 S9A 0G4

Phone:

H: (306) 441-7010 W: (000) 000-0000 C: (306) 441-7010

This patient requires about 90 days to be able to participate in his legal issues due to medical reasons

Sincerely,

M. O. Ovakporaye, MD

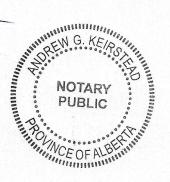
Prac ID: 524231108

## EXHIBIT B: LETTER SENT TO ATTORNEY GENERAL OF ALBERTA AND LEELA AHEER AND CONFIRMATION OF DELIVERY

A Commissioner for Oaths in and for

the Province of Alberta

ANDREW G. KEIRSTEAD Barrister, Solicitor and Notary Public



### ENGINEERING REIMAGINED

To: Minister Tyler Shandro, Attorney General of Alberta

CC: MLA Leela Aheer

September 9, 2022,

From: Dale J. Richardson, Director

DSR Karis Consulting Inc. (AB office)

116 West Creek Meadow,

Chesteremere, AB

T1X 1T2

dale.richardson@dsrkarisconsulting.com

Tel: 587-575-5045

Fax: 639-630-2551

Re: Criminal activity in the Judicial System in Alberta

Dear Minister Shandro,

This transmittal is to inform you of the serious nature of criminal activity that is occuring within the judicial system within the province of Alberta that has negatively impacted the lawful operation of DSR Karis Consulting Inc. ("DSR Karis") a federal corporation extra-provincially registered to operate within the jurisdiction of Alberta. Attached is the preliminary report titled "THE ENGINEERING OF BIOTERRORISM, CHILD TRAFFICKING, TREASON AND THE CRIME OF AGGRESSION UPDATE (A PRELIMINARY REPORT AND ANALYSIS OF RISK)" protected by United States copyright. This material outlines threats to the territorial integrity of Canada and the United States that have had a negative impact on the province of Alberta and its economic security.

Federal encroachment unauthorized by the constitution has been permitted by Associate Chief Justice Rooke in the Court of Queen's Bench for Alberta. Associate Chief Justice Rooke is directly responsible for this continued federal encroachment that has negatively impacted Alberta interests in a manner expressly forbidden by law.

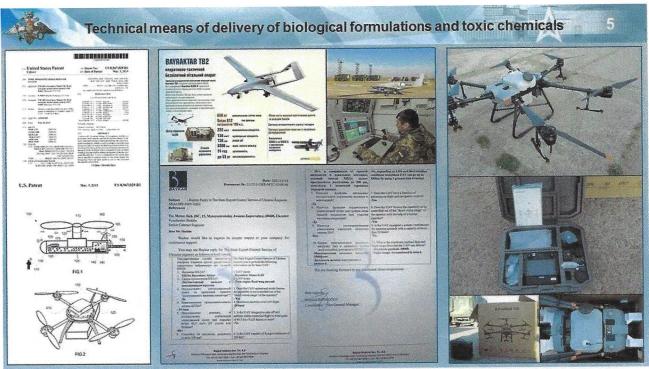


Illustration 1: Delivery of biological formulations

Illustration 1: Delivery of biological formulations outlines the potential risk of delivery of a biological agent to a target. A possible means of introduction is a ventilation system which could be used to attack an unsuspecting population in a terrorist attack. When analyzing risk, this is an unacceptable risk to leave unaccounted for. Such risk assessment is part of pandemic response until terrorist attack can be safely ruled out. However as the attached documentation states response to bioterrorism and pandemic response are similar. The attached report that is a culmination of research conducted by three persons which includes DSR Karis Consulting Inc. and its CEO, Dale J. Richardson. The aforementioned research is protected by United States copyright and the research of the CEO is currently in the process of coming to print.

The document suggests that pandemic response could potentially lower operating costs for small and mid sized businesses who are more likely to be affected by the impact of the pandemic or threat of bioterrorism. This would have a positive benefit on the operation and viability of businesses in Alberta and is an area that cannot be overlooked.

The unlawful restraint and facilitation and participation in gross criminal activity within the ministry under your direct control is hindering the security of Alberta, Canada and the United States. Unlawful and unwarranted state interference into a federal corporation registered to operate in the province of Alberta is unacceptable. DSR Karis demands that swift action be taken to mitigate the unlawful threat to the interests of the province of Alberta by rogue elements operating with in it.

The Director can be reached at the contact information above.

Dale J. Richardson



#### Tracking number

9508188708817349

Delivered

Shipping service: Expedited Parcels

Delivery standard: Sept. 12

Reason for delivery standard date change: Item was received by Canada Post at a different location than expected.

#### Latest updates

Date	Time	Location	Progress	Post office
Sept. 13	12:19 pm		Signature available	
Sept. 13	12:19 pm	STRATHMORE, AB	Delivered	
Sept. 13	9:19 am	STRATHMORE, AB	Item out for delivery	
Sept. 13	7:07 am	STRATHMORE, AB	Item processed	
Sept. 12	1:37 pm	STRATHMORE, AB	Item rescheduled for delivery next business day.	
Sept. 12	8:50 am	STRATHMORE, AB	Item processed	
Sept. 9	8:39 pm	CALGARY, AB	Item processed	
Sept. 9	4:16 pm	CALGARY, AB	Item accepted at the Post Office	
Sept. 9			Electronic information submitted by shipper	

Features and options

Signature Required

© 2019 Canada Post Corporation



Date: 2022/09/13

Dear Sir or Madam

Please find below the scanned delivery date and signature of the recipient of the item identified below:

Item Number 9508188708817349

Product Name Expedited Parcels

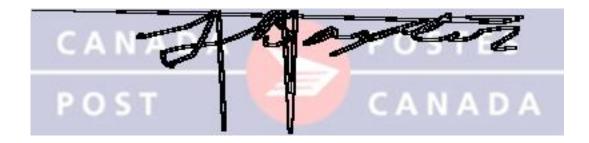
Reference Number 1 Not Applicable

Reference Number 2 Not Applicable

Delivery Date (yyyy/mm/dd) 2022-09-13

Signatory Name L AHEER

Signature



Yours sincerely,

**Customer Relationship Network** 

1-888-550-6333.

(From outside Canada 1 416 979-3033)

This copy confirms to the delivery date and signature of the individual who accepted and signed for the item in question. This information has been extracted from the Canadapost data warehouse



#### Tracking number

9508188708455343

Delivered

Shipping service: Expedited Parcels

Delivery standard: Sept. 12

#### Latest updates

Date	Time	Location	Progress	Post office
Sept. 12		EDMONTON, AB	Delivered	
Sept. 12			Signature available	
Sept. 12	7:18 am	EDMONTON, AB	Delivered to recipient's delivery partner	
Sept. 12	7:18 am		Signature available	
Sept. 12	7:14 am	EDMONTON, AB	Out for delivery	
Sept. 11	6:34 pm	EDMONTON, AB	Item processed	
Sept. 10	12:17 am	CALGARY, AB	Item in transit	
Sept. 9	9:17 pm	CALGARY, AB	Item processed	
Sept. 9	4:16 pm	CALGARY, AB	Item accepted at the Post Office	
Sept. 9			Electronic information submitted by shipper	

Features and options

Signature Required

© 2019 Canada Post Corporation



Date: 2022/09/13

Dear Sir or Madam

Please find below the scanned delivery date and signature of the recipient of the item identified below:

Item Number 9508188708455343

Product Name Expedited Parcels

Reference Number 1 Not Applicable

Reference Number 2 Not Applicable

Delivery Date (yyyy/mm/dd) 2022-09-12

Signatory Name A W



Signature

Yours sincerely,

**Customer Relationship Network** 

1-888-550-6333.

(From outside Canada 1 416 979-3033)

This copy confirms to the delivery date and signature of the individual who accepted and signed for the item in question. This information has been extracted from the Canadapost data warehouse

# EXHIBIT C: PIPELLA LAW – NABEEL – ROOKE - SGI – DSR KARIS CONSULTING INC. CONNECTION

This is Exhibit "referred to in the Affidavit of Sworn before me this day of A.D. 20 33

A Commissioner for Oaths in and for the Province of Alberta



#### SLATER VECCHIO LLP BARRISTERS & SOLICITORS

MAIN 604.682.5111 FAX 604.682.5197 TOLL-FREE 888.737.9990

PO BOX 10445 PACIFIC CENTRE NORTH 18TH FLOOR, 777 DUNSMUIR STREET VANCOUVER, BC V7Y 1K4 CANADA www.slatervecchio.com MICHAEL J. SLATER, Q.C.\*

JAMES U. BUCKLEY\*
AIMEE A. KING
NICHOLAS S. TSOI

JAIME M. SAROPHIM
SAMUEL J. JAWORSKI
AZKA AHSAN
TODD N. LUCYK
JASON G. SMITH
HANNAH L. SIEGMUND
ANDREA C. ROULET

ANTHONY A. VECCHIO, Q.C.\*
JAMES A. RICHARDS\*
SARO J. TURNER
NICOLE M. KELLY
L.W. VIVIAN CHEUNG
BO R. BAHARLOO
VIC S. MAAN
RYAN W. PROKOPISHIN
RYAN T. MATHEUSZIK
JUSHIN GHUMAN

April 11, 2022

BY E-MAIL to a.stra.n.r@gmail.com

Astra Richardson-Pereira 116 West Creek Meadow Chestermere, AB T1X 1T2

Dear Astra:

Re: Our file review

Thank you for your patience in allowing us to obtain your previous counsel's file for review so that we could figure out how best to help.

Upon review of your previous counsel's file, what is clear is that you are seriously hurt and totally disabled. There is no question that you've suffered greatly as a result of these accidents. What is also clear is that there are numerous medical expert reports. Some supportive, some contradictory, and some inconclusive. While this is not unusual in cases of this nature and significance, not having clarity amongst the medical experts raises challenges and concern. Specifically, the questions of whether or not you suffered a head injury in the car accident, whether the slip and fall was a serious or less serious contributing event, and the involvement of your RIS diagnosis to your overall disability assessment. It is complicated. And it has yet to be clarified despite the number of experts and reports involved in your case to date.

This tells me that while you are totally disabled as is agreed amongst the experts, the cause of your disability will be in dispute. The MVA defendants will argue that the slip and fall is a major contributing factor to your injuries and disability. This is complicated by the fact that liability in your slip and fall case is disputed. If the store is not liable and or you are held contributory negligent your total claim will be discounted by that %. Similarly, your RIS diagnosis will be argued to be a disability on its own and a further discount to your total claim.

Adding to these concerns is what I touched upon in our first discussion together. Specifically, that your prior counsel started your MVA legal action in BC when it could have been started in Alberta then and certainly when the slip and fall and fall case action occurred in Alberta in 2017. The reason for this is to avoid what is now happening. There are two actions, not joined, 1 in BC and the other In Alberta which allows for the defendants in each of those actions to point the finger at each other for the cause of your ongoing disability. If these actions remain apart, there is room for two different judges to decide the answer to that question. Whereas, if joined in one action in Alberta it would provide more certainty to that analysis.



Another reason to move the BC action to Alberta to join with your slip and fall action, is that in BC there is a more recent "disbursements rule" that has been imposed by our government that now limits the amount of disbursements (i.e. medical reports and other various expenses) that the defendants have to pay you to only 6% of the value of the settlement and or judgment at trial. In reviewing your file, we have confirmed that there is over \$130,000 spent in disbursements to date. Given the status of your claim, and the likelihood of additional reports required, there will be further disbursements needed on top of this. Therefore, the reality is that if you keep your MVA action in BC you will run the significant risk of getting less money at the end given the more disbursements you incur to prove your claim. However, in Alberta, joining your MVA action to your slip and fall action protects you from the 6% rule. Another important reason why my opinion is that you should be moving your claim from BC to Alberta and joining it with the slip and fall claim.

On the added point of the breakup with your previous counsel, I think it's important to say, that the breakup was not as clearly one sided as I understood from our conversation together. While it's clear that you were told by your previous counsel to go find other counsel and later advised they were told to do so at the direction of the Law Society, this is not the same as being terminated by your counsel as I initially believed. The issue that arises in this scenario is whether or not your counsel is deserved of the legal fees that she seeks. This will have to be addressed at the conclusion of the claim as between your new counsel and old. But in the meantime, your previous counsel is doing everything she can to secure her right to fees. While I could express to you what the rules here in BC would be, it's not the same as in Alberta. This will have to be addressed as well by an Alberta counsel. A further reason why I recommend that you seek Alberta counsel to assist with all claims.

In summary, while I wish I could assist further, it is my opinion that keeping your claim in BC is not the way to go. It comes with the risks and the costs that I've outlined here. And for that reason, what is in your best interest and, therefore, my recommendation, is to seek Alberta counsel immediately.

I think you'll be able to use my outline here as a road map to discuss with potential Alberta counsel to help guide you with what I believe is needed. I can certainly make recommendations as to whom I believe could help you if you would like me to.

Yours truly,

SLATER VECCHIQ LLP

James A. Richards Direct Line (604) 602-5470 /nms

#### **Dale Richardson**

From: Burgess, Vicki <vburgess@brownleelaw.com>

**Sent:** October 5, 2020 1:11 PM

To: Dale Richardson

Subject: DSR Karis Consulting Inc. v. Court of Queen's Bench for Saskatchewan et al Action

NO.: T-115-2- Our File No.: 86508.0016

Attachments: B3801458.pdf

With respect to the above-noted matter, please find correspondence attached from Nabeel Peermohamed.

Thank you.



VICKI BURGESS | LEGAL ASSISTANT | BROWNLEE LLP
ASSISTANT TO NABEEL PEERMOHAMED, CHRISTIANNE MURPHY & MARK HEIN
m. 403-232-8300 | d. 403-260-5302 | f. 403-232-8408 | vburgess@brownleelaw.com
SUITE 1500 | 530 - 8 AVENUE SW | CALGARY, AB T2P 3S8
Toll-Free. 800-661-9069 | www.brownleelaw.com

Please note that our Calgary office has moved. We are now located in Watermark Tower at 530 8 Ave SW, Suite 1500.

To help limit the spread of the COVID-19, the Brownlee LLP Edmonton and Calgary offices are closed to the public. Email, telephone, and video conferencing, including Zoom and Skype are the primary channels of communication for our clients with their lawyer instead of in-person meetings. Please refer to our <u>COVID-19 resource page</u> that features articles written by our lawyers that examine how COVID-19 is affecting different industries and municipalities.

Brownlee LLP would like the opportunity to send you invitations and legal news electronically. Please give us your permission by *clicking here*.

This information transmitted is intended only for the addressee and may contain confidential, proprietary and/or privileged material. Any unauthorized review, distribution or other use of or the taking of any action in reliance upon this information is prohibited. Attachment to this E-mail may contain viruses that could clamage your computer system. We do not accept liability for any damage which may result from software viruses. If you received this in error, please contact the sender and delete or destroy this message and any copies.

I am the director of DSR Karis Consulting Inc. and I certify this is a true copy of the federal corporations records



Suite 1500 530 8<sup>th</sup> Ave. SW

Calgary, AB Canada T2P 3S8 Telephone: (403) 232-8300 Telecopier: (403) 232-8408 E-Mail: e-mail@brownleelaw.com WebSite: www.brownleelaw.com

Refer to:

Nabeel Peermohamed

Direct Line: E-mail:

403-260-5301

npeermohamed@brownleelaw.com

Our File No .:

86508.0016

October 5, 2020

VIA EMAIL: dale.richardson@dsrkarisconsulting.com

DRS Consulting Inc. c/o Dale Richardson 1292 – 95<sup>th</sup> Street North Battleford, Saskatchewan S9A 0G2

Attention: Dale Richardson

Dear Sir:

Re: DSR Karis Consulting Inc. v. Court of Queen's Bench for Saskatchewan et al

Action No.: T-115-20

We are writing to advise you that we have just been retained to represent the interests of the Defendants, SGI and Jordan Ottenbreit, in the above-referenced action.

Yours truly,

**BROWNLEE LLP** 

Nabeel Peermohamed

NSP/vb

I am the director of DSR Karis Consulting Inc. and I certify this is a true copy of the federal corporations records

#### **Dale Richardson**

From: Burgess, Vicki <vburgess@brownleelaw.com>

**Sent:** October 15, 2020 4:01 PM

To: Dale Richardson
Cc: Nabeel Peermohamed

**Subject:** DSR Karis Consulting Inc. v. Court of Queen's Bench for Saskatchewan et al Action

No.: T11520 Our File No.: 86508.0016

**Attachments:** B3814790.pdf; B3814327.pdf

With respect to the above-noted matter, please find correspondence from Nabeel Peermohamed attached, along with noted enclosure.

Thank you.



VICKI BURGESS | LEGAL ASSISTANT | BROWNLEE LLP
ASSISTANT TO NABEEL PEERMOHAMED, CHRISTIANNE MURPHY & MARK HEIN
m. 403-232-8300 | d. 403-260-5302 | f. 403-232-8408 | vburgess@brownleelaw.com
SUITE 1500 | 530 - 8 AVENUE SW | CALGARY, AB T2P 3S8
Toll-Free. 800-661-9069 | www.brownleelaw.com

Please note that our Calgary office has moved. We are now located in Watermark Tower at 530 8 Ave SW, Suite 1500.

To help limit the spread of the COVID-19, the Brownlee LLP Edmonton and Calgary offices are closed to the public. Email, telephone, and video conferencing, including Zoom and Skype are the primary channels of communication for our clients with their lawyer instead of in-person meetings. Please refer to our COVID-19 resource page that features articles written by our lawyers that examine how COVID-19 is affecting different industries and municipalities.

Brownlee LLP would like the opportunity to send you invitations and legal news electronically. Please give us your permission by clicking here.

This information transmitted is intended only for the addressee and may contain confidential, proprietary and/or privileged material. Any unauthorized review, distribution or other use of or the taking of any action in reliance upon this information is prohibited. Attachment to this E-mail may contain viruses that could damage your computer system. We do not accept liability for any damage which may result from software viruses. If you received this in error, please contact the sender and delete or destroy this message and any copies.

I am the director of DSR Karis Consulting Inc. and I certify this is a true copy of the federal corporations records



Suite 1500 530 8<sup>th</sup> Ave. SW

Calgary, AB Canada T2P 3S8 Telephone: (403) 232-8300 Telecopier: (403) 232-8408 E-Mail: e-mail@brownleelaw.com

WebSite: www.brownleelaw.com

Refer to:

Nabeel Peermohamed

Direct Line: E-mail:

403-260-5301

npeermohamed@brownleelaw.com

Our File No .:

86508.0016

October 15, 2020

VIA EMAIL: dale.richardson@dsrkarisconsulting.com

DRS Consulting Inc. c/o Dale Richardson 1292 – 95<sup>th</sup> Street North Battleford, Saskatchewan S9A 0G2

Attention: Dale Richardson

Dear Sir:

Re: DSR Karis Consulting Inc. v. Court of Queen's Bench for Saskatchewan et al

Action No.: T-115-20

With respect to the above-mentioned matter, please find enclosed on behalf of our clients', SGI and Jordan Ottenbreit, an unfiled copy of our Statement of Defence. We have sent a copy for filing and will provide you with a filed copy as soon as we receive it.

Yours truly,

I am the director of DSR Karis Consulting Inc. and I certify this is a

true copy of the federal corporations records

Nabeel Peermohamed

**BROWNLEE LLP** 

NSP/kk Enclosure

#### **ACTION**

Court File No.: T-1115-20

FEDERAL COURT

BETWEEN:

DSR KARIS CONSULTING INC.
Plaintiff

and

KIMBERLEY RICHARDSON, COURT OF QUEEN'S BENCH FOR SASKATCHEWAN, KATHLEEN CHRISTOPHERSON, JILL COOK, GLEN METIVER, JUSTICE R.W. ELSON JUSTICE CROOKS, BATTLEFORDS SEVENTH-DAY ADVENTIST CHURCH, JAMES KWON, MAZEL HOLM, GARY LUND, DAWN LUND, CIPRIAN BOLAH, JEANNIE JOHNSON, MANITOBA-SASKATCHEWAN CONFERENCE, MICHAEL COLLINS, MATRIX LAW GROUP, CLIFFORD HOLM, PATRICIA J. MEIKLEJOHN, JAYLYN E. LAWRENCE, SASKATCHEWAN HEALTH AUTHORITY, REBECCA SOY, ASSOCIATION OF PROFESSIONAL ENGINEERS AND GEOSCIENTISTS OF SASKATCHEWAN, ROBERT H. MCDONALD, ROYAL CANADIAN MOUNTED POLICE, TERRY BERG, TARUN CHHABRA, CHANTELLE THOMPSON, JENNIFER SCHMIDT MARK CLEMENTS, CHAD GARTNER, BRAD APPEL, IAN MCARTHUR, BRYCE BOHUN, KATHY IRWIN, JASON PANCHYSHYN, CARY RANSOME, OWZW LAWYERS LLP, VIRGIL A. THOMSON, BATTLEFORDS UNION HOSPITAL, BATTELFORDS MENTAL HEALTH CENTRE, REGINALD CAWOOD, DR. EJEZE, RIVER CITY PLUMBING & HEATING LTD., TODD WYNTERHALT, PROVICIAL COURT OF SASKATCHEWAN, HONOURABLE JUDGE M. PELLETIER, SGI, JORDAN OTTENBREIT, UNIVERSITY OF SASKATCHEWAN, DANIELLE GAUDET, RAYMOND HEBERT, LINDA HEBERT, EMI HOLM, CHAR BLAIR, COMMUNITY FUTURES, and LISA CIMMER

#### STATEMENT OF DEFENCE OF SGI AND JORDAN OTTENBREIT

I am the director of DSR Karis Consulting Inc. and I certify this is a true copy of the federal corporations records



Dale James Richardson

1. The Defendants, SGI and Jordan Ottenbreit (collectively, the "Defendants") deny each and every allegation set out in the Statement of Claim as if each such allegation were set out and denied separately

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

- 2. In response to the whole of the Statement of Claim, the Defendants state that the allegations set out in the Statement of Claim should be struck, in whole or in part, on the basis that:
  - a. The allegations and contents of the Statement of Claim do not disclose any reasonable or comprehensible case of action against the Defendants;
  - b. The allegations are scandalous, frivolous, or vexatious; and,
  - c. The allegations are an abuse of process.
- 3. In further answer to the whole of the Statement of Claim, the Defendants specifically deny that they were negligent or breached any duty of care they owed or may have owed to the Plaintiffs, either as alleged in the Statement of Claim, or at all.
- 4. In further answer to the whole of the Statement of Claim, the Defendants specifically deny that the Plaintiff has suffered any losses, damages, and/or expenses whether as alleged or at all, and puts the Plaintiff to the strict proof thereof.
- 5. In response to any claims in the Statement of Claim resembling allegations of defamation, the Defendants categorically deny that its alleged conduct was slanderous or defamatory of the Plaintiff or that it has published any untrue words or statements that, in their plain and ordinary meaning, would have lowered the Plaintiff's reputation in the estimation of right thinking members of society.
- 6. Further, in response to any claims in the Statement of Claim resembling allegations of defamation, the Defendants state that any statement or documents created by, or in control of, the Defendants were not published to any third party without proper authority in law. Any records produced were not discussed in a public setting.



- 7. Further, in response to any claims in the Statement of Claim resembling allegations of defamation, the Defendants state that documents produced pursuant to appropriate authority were produced through counsel and the Defendants provided no documents to any other party.
- 8. Further, in response to any claims in the Statement of Claim resembling allegations of defamation, the Defendants rely on the defences of Absolute Privilege, Qualified Privilege and Justification.
- 9. In response to any claims in the Statement of Claim resembling allegations of conspiracy, the Defendants state there was no agreement between two or more persons to take action against the Plaintiff which intended or resulted in damage to the Plaintiff in any way.
- 10. In response to any claims in the Statement of Claim resembling allegations of intentional infliction of emotional harm, the Defendants state there were no overt acts conducted with the intention to produce harm.
- In response to any claims in the Statement of Claim resembling allegations of abuse of process, the Defendants state that any documents were produced as required by law and the Defendants did not commence any legal proceedings in any capacity related to the Plaintiff or the matters referred to in this Action.
- 12. In answer to the whole of the Statement of Claim, the Defendants deny that the Plaintiff has suffered any losses, damages and/or expenses as alleged in the Statement of Claim, or at all, and puts the Plaintiff to the strict proof thereof.
- 13. In further response to the whole of the Statement of Claim, if the Plaintiff has suffered losses, damages, and/or expenses, as alleged, which are not admitted but specifically denied, the Defendants state the damages claimed are unreasonable, excessive and exaggerated, and are too remote and not recoverable at law.
- 14. The Defendants plead and rely upon the *Freedom of Information and Protection of Privacy Act*, RSA 2000, c F-25, the *Defamation Act*, RSA 2000, c D-7, the *Contributory*

Negligence Act, RSA 2000, c C-27 and the Tort-feasors Act, RSA 2000, c T-5 and amendments thereto and regulations thereunder.

#### Remedy sought:

Dale James Richardson

- 15. Dismissal of the Plaintiff's claim.
- 16. Costs of this action on a full indemnity basis in favour of the Defendants.
- 17. Such further relief as this Honourable Court deems just.

DATED at the City of Calgary, in the Province of Alberta, this 15<sup>th</sup> day of October, 2020.

I am the director of DSR Karis Consulting Inc.
and I certify this is a true copy of the federal corporations records

Nabeel Peermohamed
Solicitors for the Defe

BROWNLEE LLP

Nabeel Peermohamed Solicitors for the Defendants, SGI and Jordan Ottenbreit

Suite 1500 530 – 8<sup>th</sup> Avenue S.W. Calgary, Alberta T2P 3S8

Telephone: (403) 232-8300 Fax: (403) 232-8408

E-Mail: npeermohamed@brownleelaw.com

Our File No. 86508.0016

TO:	THE ADMINISTRATOR Federal Court of Canada
	Canadian Occidental Tower 635 Eighth Avenue SW 3 <sup>rd</sup> Floor, Calgary, AB T2P 3M3
AND TO:	DSR Karis Consulting Inc. Power of Attorney for the Plaintiff, DSR Karis Consulting Inc. 1292 95 <sup>th</sup> Street
	North Battleford, SK S9A 0G2

	Attention: Dale Richardson
	Telephone: (306) 441-7010 Email: dale.richardson@dsrkarisconsulting.com
AND TO:	COURT OF QUEEN'S BENCH FOR SASKATCHEWAN Defendant,
	291 23 Street, Battleford, SK S0M 0E0; and
	520 Spadina Crescent E., Saskatoon, SK S7K 3G7



	Dale James Monardson
AND TO:	KATHLEEN CHRISTOPHERSON Defendant,
	291 23 Street, Battleford, SK S0M 0E0
AND TO:	JILL COOK Defendant,
	291 23 Street, Battleford, SK S0M 0E0
AND TO:	GLEN METIVER Defendant,
	520 Spadina Crescent E., Saskatoon, SK S7K 3G7
AND TO:	JUSTICE R.W. ELSON Defendant,
	520 Spadina Crescent E., Saskatoon, SK S7K 3G7
AND TO:	JUSTICE CROOKS Defendant,
	520 Spadina Crescent E., Saskatoon, SK S7K 3G7
AND TO:	BATTLEFORDS SEVENTH-DAY ADVENTIST CHURCH Defendant,
	1611 93 Street, North Battleford, SK S9A 0C5
AND TO:	JAMES KWON Defendant,
	1611 93 Street, North Battleford, SK S9A 0C5
AND TO:	MAZEL HOLM Defendant,
	1611 93 Street, North Battleford, SK S9A 0C5
AND TO:	GARY LUND Defendant,
	1611 93 Street, North Battleford, SK S9A 0C5
AND TO:	DAWN LUND Defendant,
	1611 93 Street, North Battleford, SK S9A 0C5
AND TO:	CIPRIAN BOLAH Defendant,
	1611 93 Street, North Battleford, SK S9A 0C5



Dale James Richardson

AND TO:	JEANNIE JOHNSON Defendant,
	1611 93 Street, North Battleford, SK S9A 0C5
AND TO:	MANITOBA-SASKATCHEWAN CONFERENCE Defendant,
	1004 Victoria Avenue, Saskatoon, SK S7N 0Z8
AND TO:	MICHAEL COLLINS Defendant,
	1004 Victoria Avenue, Saskatoon, SK S7N 0Z8
AND TO:	MATRIX LAW GROUP Defendant,
	1421 101 Street, North Battleford, SK S9A 1A1
AND TO:	CLIFFORD HOLM Defendant,
	1421 101 Street, North Battleford, SK S9A 1A1
AND TO:	PATRICIA J. MEIKLEJOHN Defendant,
	1421 101 Street, North Battleford, SK S9A 1A1
AND TO:	JAYLYN E. LAWRENCE Defendant,
	1421 101 Street, North Battleford, SK S9A 1A1
AND TO:	SASKATCHEWAN HEALTH AUTHORITY Defendant,
	701 Queen Street, Saskatoon, SK S7K 0M7
AND TO:	REBECCA SOY
	Defendant,
	701 Queen Street, Saskatoon, SK S7K 0M7
AND TO:	ASSOCIATION OF PROFESSIONAL ENGINEERS AND GEOSCIENTISTS OF SASKATCHEWAN Defendant,
	300 4581 Parliament Avenue, Regina, SK S4W 0G3
AND TO:	ROBERT H. MCDONALD Defendant,
	300 4581 Parliament Avenue, Regina, SK S4W 0G3



Dale James Richardson

AND TO:	ROYAL CANADIAN MOUNTED POLICE Defendant,
	1052 101 Street, North Battleford, SK S9A 0Z3; and
	73 Leikin Drive, Ottawa, ON K1A 0R2
AND TO:	BRENDA LUCKI Defendant,
	73 Leikin Drive, Ottawa, ON K1A 0R2
AND TO:	ALFRED BANGALOY Defendant,
	6101 Dewdney Avenue, Regina, SK S4P 3K7
AND TO:	CONSTABLE BURTON ROY Defendant,
	1052 101 Street, North Battleford, SK S9A 0Z3
AND TO:	CONSTABLE CARTIER Defendant,
	1052 101 Street, North Battleford, SK S9A 0Z3
AND TO:	LASH-BERG TOWING Defendant,
	121 4 Avenue West, Battleford, SK S0M 0E0
AND TO:	TERRY BERG Defendant,
	121 4 Avenue West, Battleford, SK S0M 0E0
AND TO:	TARUN CHHABRA Defendant,
	1152 101 Street, North Battleford, SK S9A 0Z6
AND TO:	CHANTELLE THOMPSON Defendant,
	240 10 Research Drive, Regina, SK S4S 7J7
AND TO:	JENNIFER SCHMIDT Defendant,
	1202 102 Street, North Battleford, SK S9A 2Y7
AND TO:	MARK CLEMENTS Defendant,
	1202 102 Street, North Battleford, SK S9A 2Y7



AND TO:	CHAD GARTNER Defendant,
	1202 102 Street, North Battleford, SK S9A 2Y7
AND TO:	BRAD APPEL Defendant,
	198 1 Avenue NE, Swift Current, SK S9H 2B2
AND TO:	IAN MCARTHUR Defendant,
	240 10 Research Drive, Regina, SK S4S 7J7
AND TO:	BRYCE BOHUN Defendant,
	1202 102 Street, North Battleford, SK S9A 2Y7
AND TO:	KATHY IRWIN Defendant,
	131 22 Street, Battleford, SK S0M 0E0
AND TO:	JASON PANCHYSHYN Defendant,
	198 1 Avenue NE, Swift Current, SK S9H 2B2
AND TO:	CARY RANSOME Defendant,
	198 1 Avenue NE, Swift Current, SK S9H 2B2
AND TO:	OWZW LAWYERS LLP; Defendant,
	2002 Victoria Avenue #1000, Regina, SK S4P 0R7
AND TO:	VIRGIL A. THOMSON Defendant,
	2002 Victoria Avenue #1000, Regina, SK S4P 0R7
AND TO:	BATTLEFORDS UNION HOSPITAL Defendant,
	1092 107 Street, North Battleford, SK S9A 1Z1
AND TO:	BATTELFORDS MENTAL HEALTH CENTRE Defendant,
	PO Box 512 Cochin, SK S0M 0L0



AND TO:	REGINALD CAWOOD Defendant,
	PO Box 512 Cochin, SK S0M 0L0
AND TO:	DR. EJEZE Defendant,
	1092 107 Street, North Battleford, SK S9A 1Z1
AND TO:	DR. ALABI Defendant,
	1092 107 Street, North Battleford, SK S9A 1Z1
AND TO:	RIKKI MORRISSON Defendant,
	1092 107 Street, North Battleford, SK S9A 1Z1
AND TO:	CORA SWERID Defendant,
	1092 107 Street, North Battleford, SK S9A 1Z1
AND TO:	SASKATCHEWAN HOSPITAL Defendant,
	1 Jersey Street, North Battleford, SK S9A 2X8
AND TO:	TONYA BROWARNY Defendant,
	1 Jersey Street, North Battleford, SK S9A 2X8
AND TO:	RIVER CITY PLUMBING & HEATING LTD. Defendant,
	841 106 Street, North Battleford, SK S9A 1W3
AND TO:	TODD WYNTERHALT Defendant,
	841 106 Street, North Battleford, SK S9A 1W3
AND TO:	PROVICIAL COURT OF SASKATCHEWAN Defendant,
	3 Railway Avenue E, North Battleford, SK S9A 2P9
AND TO:	HONOURABLE JUDGE M. PELLETIER Defendant,
	3 Railway Avenue E, North Battleford, SK S9A 2P9

AND TO:	UNIVERSITY OF SASKATCHEWAN Defendant,
	105 Administration Place, Saskatoon, SK S7N 5A2
AND TO:	DANIELLE GAUDET Defendant,
	105 Administration Place, Saskatoon, SK S7N 5A2
AND TO:	RAYMOND HEBERT Defendant,
	1811 100 Street, North Battleford, SK S9A 0X1
AND TO:	LINDA HEBERT Defendant,
	1152 101 Street, North Battleford, SK S9A 0Z6
AND TO:	EMI HOLM Defendant,
	15 9800 Territorial Drive, North Battleford, SK S9A 3N6
AND TO:	CHAR BLAIR Defendant,
	15 9800 Territorial Drive, North Battleford, SK S9A 3N6
AND TO:	COMMUNITY FUTURES Defendant,
	504 Frontier Way, North Battleford, SK S9A 1B7
AND TO:	LISA CIMMER Defendant,
	504 Frontier Way, North Battleford, SK S9A 1B7
AND TO:	KIMBERLEY RICHARDSON Defendant,
	1202 102 Street, North Battleford, SK S9A 2Y7

[Rule 4.24]

Clerk's Stamp

COURT FILE NUMBER 1801-01931

COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

PLAINTIFFS JORGE FELINO PEREIRA, ASTRA RICHARDSON-PEREIRA,

AND ISAIAH DAVID FELINO RICHARDSON PEREIRA, AN

INFANT BY HIS LITIGATION GUARDIAN, ASTRA

RICHARDSON PEREIRA, AND HER MAJESTY THE QUEEN IN

RIGHT ALBERTA

DEFENDANTS WESTMERE PROPERTIES INC., ABC CORPORATION,

SHOPPERS DRUG MART INC., SHOPPERS DRUG MART CHESTERMERE STATION, o/a STORE #2308, SALINA BANDALI, TODD MOSELEY, LOBLAW COMPANIES

LIMITED, JOHN DOE I, JOHN DOE II, and JOHN DOE III

DOCUMENT FORMAL OFFER TO SETTLE

PARTY FILING THIS

DOCUMENT

WESTMERE PROPERTIES INC., ABC CORPORATION, SHOPPERS DRUG MART INC., SHOPPERS DRUG MART CHESTERMERE STATION, o/a STORE #2308, SALINA BANDALI, TODD MOSELEY, LOBLAW COMPANIES LIMITED

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS

**DOCUMENT** 

**BROWNLEE LLP** 1500, 535-8<sup>th</sup> Avenue SW

Calgary, AB T2P 3S8

**Attention: Nabeel Peermohamed** 

Solicitors for the Defendants

Telephone: (403) 232-8300 Fax: (403) 232-8408

Email: npeermohamed@brownleelaw.com

File No.: 83498.0069

#### NOTICE TO PARTY RECEIVING OFFER:

JORGE FELINO PEREIRA, ASTRA RICHARDSON-PEREIRA, AND ISAIAH DAVID FELINO RICHARDSON PEREIRA, AN INFANT BY HIS LITIGATION GUARDIAN, ASTRA RICHARDSON PEREIRA, AND HER MAJESTY THE QUEEN IN RIGHT ALBERTA

You have received a formal offer to settle. Go to the end of this document to see what the consequences are if you fail to accept this offer.

#### Parties making the offer:

1. The Defendants.

#### To whom the offer is made:

2. The Plaintiffs.

#### What the offer is:

3. The Defendants shall accept they are 25% liable for the Plaintiffs' slip and fall accident that occurred on April 28, 2017.

#### **Conditions attached to the offer:**

- 4. Acceptance of this offer must be in compliance with Rule 4.25 of the *Alberta Rules of Court*.
- 5. This offer is open for acceptance for two (2) months of the start of a hearing for judgment, whichever comes first, after which time this offer will automatically expire and be withdrawn by the Defendants without further notice.
- 6. If this offer is accepted, the parties shall make arrangements for the appropriate consent order.

#### **Interest:**

7. N/A

#### **Costs:**

8. N/A

#### Requirements that must be complied with to accept the offer:

9. Pursuant to Rule 4.25(2) of the Alberta *Rules of Court*, the Plaintiffs are required to file the Offer and the acceptance of it and serve on the Defendants notice that the Offer has been accepted and that the terms of any judgment or order in the Offer have been agreed to.

#### Form of acceptance of the offer:

10. Form of acceptance is attached.

Expiry date of this offer: 2 months from the date of service of this Formal Offer to Settle.

**DATED** at the City of Calgary, in the Province of Alberta, this 24th day of March, 2021.

#### **BROWNLEE LLP**

Per: Nabeel Peermohamed
Solicitors for the Defendants

#### WARNING

If this formal offer of the Defendant is not accepted and subsequently the Defendant obtain a judgment or order in the action that is equal to or more favorable to the Defendant than this Formal Offer, the Defendant are entitled to double costs to which they would otherwise have been entitled for all steps taken in the action in relation to the action or claim specified in this Formal Offer, excluding disbursements after service of this Formal Offer.

COURT FILE NUMBER 1801-01931

COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

PLAINTIFFS JORGE FELINO PEREIRA, ASTRA RICHARDSON-PEREIRA,

AND ISAIAH DAVID FELINO RICHARDSON PEREIRA, AN

INFANT BY HIS LITIGATION GUARDIAN, ASTRA

RICHARDSON PEREIRA, AND HER MAJESTY THE QUEEN IN

RIGHT ALBERTA

DEFENDANTS WESTMERE PROPERTIES INC., ABC CORPORATION,

SHOPPERS DRUG MART INC., SHOPPERS DRUG MART CHESTERMERE STATION, o/a STORE #2308, SALINA

BANDALI, TODD MOSELEY, LOBLAW COMPANIES LIMITED,

JOHN DOE I, JOHN DOE II, and JOHN DOE III

DOCUMENT FORMAL ACCEPTANCE OF OFFER TO SETTLE

DATE \_\_\_\_

TO WESTMERE PROPERTIES INC., ABC CORPORATION,

SHOPPERS DRUG MART INC., SHOPPERS DRUG MART CHESTERMERE STATION, o/a STORE #2308, SALINA

BANDALI, TODD MOSELEY, LOBLAW COMPANIES LIMITED,

JOHN DOE I, JOHN DOE II, and JOHN DOE III

FROM JORGE FELINO PEREIRA. ASTRA RICHARDSON-PEREIRA.

AND ISAIAH DAVID FELINO RICHARDSON PEREIRA, AN

INFANT BY HIS LITIGATION GUARDIAN, ASTRA

RICHARDSON PEREIRA, AND HER MAJESTY THE QUEEN IN

RIGHT ALBERTA

TAKE NOTICE that pursuant to Rule 4.25 of the Alberta *Rules of Court*, the Plaintiffs hereby accept the Formal Offer of the Defendants dated March 24, 2021.

**PIPELLA LAW** 

Per:

Derek Allchurch

Solicitors for the Plaintiffs

# Jorge Perira and Astra Richardson-Pereira v. Tara Pipella, Pipella Law Q.B. File No. 2101 15892 REVIEW AND ASSESSMENT PROCEEDINGS LOG

Appointment Filed on:	December 22, 2021
Original Return Date:	January 4, 2022 @ 10:30 a.m.

# **Adjournments:**

Date Arranged	Adjourned to	Reasons for Adjournment & How Arranged
January 4, 2022	January 18, 2022 at 9:00 a.m.	This is a review of disbursements claimed under a contingency fee agreement, following a change in counsel. The file has not yet been transferred to the new lawyer and the Law Firm's claim for immediate payment may prevent the transfer. I adjourned the review to give the Law Firm a chance to work out a realistic file transfer arrangement with the new lawyer. If more time is needed for this, the parties may agree to a further adjournment, without the filing of an Amended Appointment for Review.
January 18, 2022	Sine die	Ms. Astra Richardson-Pereira was self-represented. The Law Firm was represented by Derek Allchurch. Both appeared electronically. Mr. Allchurch advised that he had had discussions with Mr. Horwiz and that they agreed that the disbursements would paid at the end of the action. However, Mr. Horwiz has not yet entered into a new contingency fee agreement with Richardson-Pereira. I adjourned the review so that, assuming Mr. Horwiz agrees to act, he and Mr. Allchurch could come to an agreement on the disbursements or narrow the issues for a review of them. If they cannot come to an agreement, then they may rebook the review, without the need to file additional documents. On the issue of fees, the lawyers may set down a

		fee-split review if they cannot agree on a precise spit. This however, would be done after Ms. Richardson-Pereira's legal action has been successfully concluded.
January 20, 2022	February 11, 2022 at 9:00 a.m.	The parties have agreed to rebook this matter for February 11 <sup>th</sup> . A confirmation email is e-filed on the system.
February 11, 2022	Sine die	Ms. Richardson-Pereira appeared by telephone, with her brother, Dale Richardson. Mr. Allchurch appeared by Webex. Mr. Richardson ad vised that Mr. Horwiz would not act for Ms. Richardson-Pereira because he could not come to an arrangement with Mr. Allchurch's firm and was angry. Mr. Allchuch responded to this and advised that offers were made to Mr. Horwiz but because of his anger, he was unwilling to negotiate. I advised that there was nothing that I could do to resolve this situation and I suggested that Ms. Richardson-Pereira would have to make additional efforts to obtain new counsel, failing which she might have to make an application to the Court to resolve this issue. Thereafter, I adjourned the review, pending the resolution of the new counsel / file transfer issue.

# Final Disposition:

Date of Disposition	Disposition		
5 (8)			
	9		



# Written decision of the review officer

14 messages

Astra N. Richardson <a.stra.n.r@gmail.com>

To: ReviewOffice Edmonton < ReviewOffice. Edmonton@albertacourts.ca>

Mon., Apr. 25, 2022 at 1:52 p.m.

Good afternoon Marlene,

I am requesting all of the written decisions of Dennis Pawlowski from this year.

Thanks,

Have a fantastic day,

Sincerely, Astra N. Richardson-Pereira

**ReviewOffice Edmonton** <ReviewOffice.Edmonton@albertacourts.ca> To: a.stra.n.r@gmail.com <a.stra.n.r@gmail.com>

Thu., May 5, 2022 at 2:44 p.m.

Good day, Ms. Richardson,

Review Officers do not write written decisions. Reasons for decisions are given orally at the end of a review.

Regards,

Marlene Brown-Crichlow

Assistant to the Review Officer

2<sup>nd</sup> Floor, 1 A Sir Winston Churchill Square, Edmonton, AB T5R 0R2

Phone: 780 422-1520

From: ReviewOffice Edmonton Sent: May 3, 2022 12:11 PM

To: Dennis Pawlowski < Dennis. Pawlowski@albertacourts.ca>

Subject: FW: Written decision of the review officer

Marlene Brown-Crichlow

Assistant to the Review Officer

2<sup>nd</sup> Floor, 1 A Sir Winston Churchill Square, Edmonton, AB T5R 0R2

Phone: 780 422-1520

From: Astra N. Richardson <a.stra.n.r@gmail.com>

Sent: April 25, 2022 01:53 PM

To: ReviewOffice Edmonton <ReviewOffice.Edmonton@albertacourts.ca>

Subject: Written decision of the review officer

You don't often get email from a.stra.n.r@gmail.com. Learn why this is important

[Quoted text hidden]

#### Astra N. Richardson <a.stra.n.r@gmail.com>

Thu., May 5, 2022 at 7:54 p.m.

To: ReviewOffice Edmonton <ReviewOffice.Edmonton@albertacourts.ca>

Good evening Marlene,

How is a review officer decision enforceable if it is not written? How can someone prove the decision without it in writing? I need evidence of the oral decision in writing for proof of the decision and because the review office said so isn't going to cut it.

Provide me something in writing that I can demonstrate the decision of the review officer to another person please.

**Thanks** 

Have a blessed day!

Thanks, Astra N. Richardson-Pereira [Quoted text hidden]

**ReviewOffice Edmonton** <ReviewOffice.Edmonton@albertacourts.ca> To: Astra N. Richardson <a.stra.n.r@gmail.com>

Fri., May 6, 2022 at 1:05 p.m.

Ms. Richardson,

The decision of all review officers is recorded in a certificate of review and not by itself. I can provide you a copy of the certificate of review or if you require a copy of the transcript of the review hearing, you can order it from Transcript Management.

[Quoted text hidden]

Astra N. Richardson <a.stra.n.r@gmail.com>

Fri., May 6, 2022 at 1:15 p.m.

To: ReviewOffice Edmonton <ReviewOffice.Edmonton@albertacourts.ca>

Yes I would like a copy of the certificate via email.

Have a blessed day!

Thanks,

Astra N. Richardson-Pereira

[Quoted text hidden]

# ReviewOffice Edmonton < ReviewOffice. Edmonton@albertacourts.ca>

Fri., May 6, 2022 at 1:24 p.m.

To: Astra N. Richardson <a.stra.n.r@gmail.com>

What is the style of cause or the court file number of your matter, please?

[Quoted text hidden]

#### Astra N. Richardson <a.stra.n.r@gmail.com>

Fri., May 6, 2022 at 2:01 p.m.

To: ReviewOffice Edmonton <ReviewOffice.Edmonton@albertacourts.ca>

It was Jorge Pereira, Astra Richardson-Pereira vs Derek Allchurch and Tara Pipella of Pipella Law. The file number is 2101-15892.

Thanks,

Have a blessed day!

Thanks,

Astra N. Richardson-Pereira

[Quoted text hidden]

# ReviewOffice Edmonton <ReviewOffice.Edmonton@albertacourts.ca>

Fri., May 6, 2022 at 2:07 p.m.

To: Astra N. Richardson <a.stra.n.r@gmail.com>

[Quoted text hidden]

## Astra N. Richardson <a.stra.n.r@gmail.com>

Fri., May 6, 2022 at 2:36 p.m.

To: ReviewOffice Edmonton <ReviewOffice.Edmonton@albertacourts.ca>

Good afternoon Marlene,

I need a written copy of the decision to place the matter over sine die until the conclusion of the case and then the parties will come back at the end of the case and decide the division of costs. I need a written record of that decision.

I will also want a transcript of that as well.

For clarity I will list this again;

- 1) the decision of the review officer to adjourn the matter sine die because both parties agreed to have the disbursements decided at the conclusion of the cases and, (this must be an official court document)
- 2) a copy of the transcript from the day of the decision of the review officer that was mentioned in paragraph 1. ( if this comes from the transcript office this is fine)

Have a blessed day!

**ReviewOffice Edmonton** <ReviewOffice.Edmonton@albertacourts.ca> To: Astra N. Richardson <a.stra.n.r@gmail.com>

Fri., May 6, 2022 at 2:53 p.m.

I have provided you with the certificate of review. You can order a copy of the transcript from Transcript Management.

Transcript Management contact information can be found on the Alberta Courts website, under Review & Assessment.

[Quoted text hidden]

## Astra N. Richardson <a.stra.n.r@gmail.com>

Fri., May 6, 2022 at 3:15 p.m.

To: ReviewOffice Edmonton < ReviewOffice. Edmonton@albertacourts.ca>

What I need is the record of the court action that was taken when I appeared before the review officer. The certificate that you sent bears today's date. That is not when the matter was adjourned sine die. I want some written record of what took place and the agreement that was made for both parties to come before the review officer at the conclusion of the case. The certificate that you are trying to give me is worthless. I need confirmation from the review officer as to what his decision was regarding the matter. I am aware that not all of the hearing was recorded, as the review officer mentioned when he was recording Mr. allchurch. I want in writing from the court a fiat of what happened each time I appeared before the review officer. there has to be a court memo or some form of written documentation recording what has happened. I want a copy of the court memo, fiat, notes or whatever it was because there was no certificate given.

Again I am requesting some form of court record of the actions of the review officer and what transpired those days. There must be court records of actions taken or they are meaningless. I want the records of what happened for each time I appeared please and thank you.

[Quoted text hidden]

**ReviewOffice Edmonton** <ReviewOffice.Edmonton@albertacourts.ca> To: Astra N. Richardson <a.stra.n.r@gmail.com>

Mon., May 9, 2022 at 8:21 a.m.

Hello.

I have provided you with a copy of the review officer's certificate of review. This is the only record we have here at the courts except for the filed copy of Form 42 and confidential evidence.

If you require a copy of the transcript, please request it from Transcript Management. Transcript Management contact information is below.

If you have questions about ordering a courtroom transcript, or any TMS related inquires, please contact: Transcript

Management Services

Calgary Courts Centre

Suite 1901-N, 601-5th Street S.W

Calgary, Alberta T2P 5P7

Phone: 403-297-7392 Fax: 403-297-7034 Email: tms.calgary@gov.ab.ca Thank you, [Quoted text hidden] ReviewOffice Edmonton < ReviewOffice. Edmonton@albertacourts.ca> Mon., May 9, 2022 at 8:46 a.m. To: Astra N. Richardson <a.stra.n.r@gmail.com> Hello Astra, I apologize for the confusing regarding your previous email. I have attached the Proceedings Log for the hearing. I hope this can assist you in your legal proceedings. Please confirm receipt. [Quoted text hidden] Astra N. Richardson <a.stra.n.r@gmail.com> Tue., May 10, 2022 at 1:47 p.m. To: Unity <unity@dsrkarisconsulting.com>

Have a blessed day!

Thanks, Astra N. Richardson-Pereira

[Quoted text hidden]

## Unity

From: CalgaryResolution SupportCentre < CalgaryResolutionSupportCentre@just.gov.ab.ca>

Sent: March 23, 2022 9:26 AM

To: Unity

Subject: Filed order 2201 03422 Attachments: filed order 2201 03422

## Hello,

Please find attached a courtesy copy of your filed court order. Please note that this email does not constitute service.

Please advise if you require a certified hard copy of your order. If so, please provide your **FULL** mailing address so it can be sent to you.

Regards,

#### Melissa

Resolution Support Centre staff are not lawyers and cannot give you legal advice nor predict the outcome of court proceedings. You may wish to speak with a lawyer about your legal issue.

This communication is intended for the use of the recipient to which it is addressed, and may contain confidential, personal and or privileged information. Please contact us immediately if you are not the intended recipient of this communication, and do not copy, distribute, or take action relying on it. Any communication received in error, or subsequent reply, should be deleted or destroyed.

Resolution Support Centre Suite 706-S, Calgary Courts Centre 601 - 5 Street SW Calgary, AB T2P 5P7

Phone: 403-476-4744

# Unity

From: Do\_Not\_Reply\_FMSADM@gov.ab.ca

Sent: March 23, 2022 9:23 AM

To: CalgaryResolutionSupportCentre@just.gov.ab.ca

Subject: filed order 2201 03422 Attachments: filed order 2201 03422.pdf

Please open the attached document. It was sent to you using a Xerox multifunction printer.

Attachment File Type: pdf, Multi-Page

Multifunction Printer Location:

Multifunction Printer Name: Xerox AltaLink C8170 (9D:8E:A2)

COURT FILE NUMBER

2201 03422

COURT

Court of Queen's Bench of Alberta

JUDICIAL CENTRE

Calgary

**APPLICANT** 

DALE J. RICHARDSON

RESPONDENTS

KAREN HORNER JUSTICE, ATTORNEY GENERAL OF CANADA, KIMBERLEY

RICHARDSON

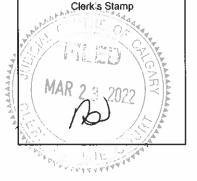
**DOCUMENT** 

ORDER

ORDER PREPARED BY

Court Generated Orders Clerk -

Resolution Services



DATE ON WHICH ORDER WAS PRONOUNCED: 22nd DAY OF MARCH, 2022

LOCATION OF HEARING OR TRIAL: Calgary

NAME OF JUSTICE WHO MADE THIS ORDER: THE HONOURABLE MR. JUSTICE C.M. JONES

\*\*\*These matters were conducted using a virtual courtroom, and all participants, exclusive of the Justice and Clerk, appeared via WebEx\*\*\*

THE COURT HAS REVIEWED THE APPLICATION FILED IN SUPPORT OF THIS APPLICATION AND HAS BEEN ADVISED OF THE FOLLOWING:

DALE J. RICHARDSON, the Applicant, was present in Court;

KAREN HORNER JUSTICE, ATTORNEY GENERAL OF CANADA, and KIMBERLEY RICHARDSON, the Respondents, were not served with notice of this application;

#### IT IS ORDERED THAT:

- The application without notice of DALE J. RICHARDSON for mandatory, prohibitory and declarative relief as set out in the Applicant's materials is dismissed.
- The applicant is at liberty to re-apply on proper notice to the Respondents.

Justice of the Court of Queen's Bench of Alberta



Edward S. Pipella, Q.C. (1931 - 2014) \*Tara D. Pipella Kimber R. Pipella Derek Allchurch
Dan Thorn
\*\*Patricia M. Gutek

Suite 200, Dorchester Square 1333 – 8th Street SW Calgary, Alberta T2R 1M6 www.pipellalaw.com

YOUR FILE:

OUR FILE: 6524

Assistant: Ivy Jensen

Email: ijensen@pipellalaw.com

Email: tpipella@pipellalaw.com Telephone: (403) 265-8733 Facsimile: (403) 263-3153

April 9, 2021

Mr. Jorge Felino Pereira
Ms. Astra Richardson-Pereira
Ms. Astra Richardson-Pereira, Litigation
Guardian of Isaiah David Felino Richardson-Pereira
116 West Creek Meadow
Chestermere, AB T1X 1T2

VIA EMAIL & VIA PROCESS SERVER

Dear Sir/Madam:

RE: Richardson-Pereira et al v Westmere Properties Inc. et al

Action No.: 1801-01931

Enclosed herewith, for service upon you, please find enclosed the following:

- Order granted by Associate Chief Justice Rooke on March 26, 2021, filed with the Clerk of the Court on March 31, 2021; and
- Notice of Withdrawal of Lawyer of Record, filed with the Clerk of the Court on April 2, 2021.

Yours sincerely,

**PIPELLA Law** 

TARA D. PIPELLA

TDP/ij enclosures **COURT FILE NUMBER** 

1801-01931

COURT

QUEEN'S BENCH OF ALBERTA

**JUDICIAL CENTRE** 

**CALGARY** 

**PLAINTIFFS** 

JORGE FELINO PEREIRA, ASTRA RICHARDSON-PEREIRA, and ISAIAH DAVID FELINO RICHARDSON-PEREIRA, an Infant, by his Litigation Guardian, ASTRA RICHARDSON-PEREIRA, and HER MAJESTY

Mar 31, 2021

by Emai

5037

THE QUEEN IN RIGHT OF ALBERTA

**DEFENDANTS** 

WESTMERE PROPERTIES INC., ABC

CORPORATION, SHOPPERS DRUG MART INC., SHOPPERS DRUG MART CHESTERMERE STATION.

o/a STORE #2308, SALINA BANDALI, TODD

MOSELEY, LOBLAW COMPANIES LIMITED, JOHN

DOE I, JOHN DOE II, and JOHN DOE III

**DOCUMENT** 

**ORDER** 

ADDRESS FOR SERVICE

AND CONTACT

INFORMATION OF PARTY

FILING THIS DOCUMENT

Derek Allchurch PIPELLA LAW

**Barristers & Solicitors** 

Suite 200, Dorchester Square

1333 – 8th Street SW Calgary, AB T2R 1M6 Telephone: (403) 265-8733 Facsimile: (403) 263-3153

Email: dallchurch@pipellalaw.com

File No.: 6524

DATE ON WHICH ORDER WAS PRONOUNCED:

Friday, March 26, 2021

Associate Chief Justice John

NAME OF JUSTICE WHO MADE THIS ORDER:

Rooke

**LOCATION OF HEARING:** 

Calgary, Alberta

UPON THE untimely application of counsel for the Plaintiffs pursuant to Rule 2.31 of the *Alberta Rules of Court*; AND UPON HAVING READ the Affidavit of Ivy Jensen; AND UPON having heard from Astra Richardson-Pereira and counsel for the Defendants;

#### IT IS HEREBY ORDERED THAT:

1. Pipella Law is granted immediate leave to withdraw as counsel for the Plaintiffs;

{00221617v1} Revised 7/27/2012

- The requirements of Rule 9.4 are waived; 2.
- Pipella Law may serve a copy of this Order on Astra Richardson-Pereira and on 3. counsel for the Defendants by electronic mail; and
- There shall be no costs awarded for this application. 4.

Justice of the Court of Queen's Bench of Alberta

41058 mk

COURT FILE NUMBER 1801-01931

COURT QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

PLAINTIFFS JORGE FELINO PEREIRA, ASTRA RICHARDSON-

PEREIRA, and ISAIAH DAVID FELINO RICHARDSON-PEREIRA, an Infant, by his Litigation Guardian, ASTRA RICHARDSON-PEREIRA, and HER MAJESTY THE

Apr 01, 2021

v Email

PA DE THE CO

**QUEEN IN RIGHT OF ALBERTA** 

DEFENDANTS WESTMERE PROPERTIES INC., ABC CORPORATION,

SHOPPERS DRUG MART INC., SHOPPERS DRUG MART CHESTERMERE STATION, o/a STORE #2308,

SALINA BANDALI, TODD MOSELEY, LOBLAW

COMPANIES LIMITED, JOHN DOE I, JOHN DOE II, and

JOHN DOE III

DOCUMENT NOTICE OF WITHDRAWAL OF LAWYER OF RECORD

ADDRESS FOR PIPELLA LAW
SERVICE AND Derek Allchurch
Derek Allchurch

CONTACT Barristers & Solicitors
INFORMATION OF Suite 200, Dorchester Square

INFORMATION OF Suite 200, Dorchester So PARTY FILING THIS 1333 – 8th Street SW DOCUMENT Calgary, AB T2R 1M6

Telephone: (403) 265-8733 Facsimile: (403) 263-3153

Email: dallchurch@pipellalaw.com

File No.: 6524

Pipella Law, counsel for the Plaintiffs withdraws as Lawyer of Record in this action.

The last known address for JORGE FELINO PEREIRA, ASTRA RICHARDSON-PEREIRA, ISAIAH DAVID FELINO RICHARDSON-PEREIRA, an Infant, by his Litigation Guardian, and ASTRA RICHARDSON-PEREIRA, is as follows:

116 West Creek Meadow Chestermere, AB T1X 1T2

tel: 403-472-4606

jorge.felino@gmail.com a.stra.n.r@gmail.com The last known address for HER MAJESTY THE QUEEN IN RIGHT OF ALBERTA is as follows:

Alberta Health 10025 Jasper Avenue N.W. P.O. Box 1360, Station Main Edmonton, Alberta T5J 2N3 Attention: Joannne Massey

Ph. (780) 415-0207 Fax(780) 427-0752

Legal Counsel for the Plaintiffs:

PIPELLA LAW

Per:

Derek Allchurch

## WARNING

This Withdrawal of Lawyer of Record takes effect 10 days after the Affidavit of Service of this document on every party is filed. After that date, no delivery of a Pleading or other document relating to the action is effective service on the former lawyer of record, or at any address for service previously provided by the former lawyer of record.



# Re: Pereira et al v. Westmere Properties Inc. et al / Our File: 83498.0069

2 messages

**Nabeel Peermohamed** <npeermohamed@brownleelaw.com> To: Astra N. Richardson <a.stra.n.r@gmail.com>

Tue., Aug. 16, 2022 at 12:01 p.m.

#### WITHOUT PREJUDICE

Ms. Richardson,

Please be advised we have received instructions to make the following settlement proposal on a without costs basis subject to the conditions outlined below.

Our clients will pay you \$25,000 (twenty five thousand dollars) in full settlement and resolution of the claims listed in the pleadings filed in this action. We view this offer as more than fair compensation for your alleged losses given the liability and damages evidence obtained on the record.

In exchange for the above-noted payment, it is a condition of this offer that you will file a discontinuance of claim and execute a release in favor of the Defendants in a form prepared by our office.

This offer will remain open for your acceptance for two weeks after which it will be automatically withdrawn without further notice and we will proceed to schedule the liability trial.

I look forward to hearing from you.

Thanks,





# Suite 1500 | 530 - 8 Avenue SW | Calgary, AB T2P 3S8 **Toll-Free**. 800-661-9069 | www.brownleelaw.com

Brownlee LLP would like the opportunity to send you invitations and legal news electronically. Please give us your permission by <u>clicking here</u>.

This information transmitted is intended only for the addressee and may contain confidential, proprietary and/or privileged material. Any unauthorized review, distribution or other use of or the taking of any action in reliance upon this information is prohibited. Attachment to this E-mail may contain viruses that could damage your computer system. We do not accept liability for any damage which may result from software viruses. If you received this in error, please contact the sender and delete or destroy this message and any copies.

**Astra N. Richardson** <a.stra.n.r@gmail.com> To: Unity <unity@dsrkarisconsulting.com>

Wed., Aug. 17, 2022 at 7:24 p.m.

Have a blessed day!

Thanks, Astra N. Richardson-Pereira [Quoted text hidden] Winnipeg MB R3C 3M2

Date

Nov 10, 2021

Account number

XXX XX5 295

Reference number

6308

ATTN: TARA D. PIPELLA PIPELLA LAW 200-1333 8 ST SW CALGARY AB T2R 1M6

Dear Sir or Madam:

Subject: Income tax information for 2014 to 2020 for ASTRA RICHARDSON-PEREIRA

We received your request of July 22, 2021, for the above information.

Although you asked for a photocopy or photocopies of the original return(s) filed, we are sending you printouts showing the most current information. This includes changes we made on the initial assessment(s) or reassessment(s).

If you need more information, please call 1-800-959-8281 or go to canada.ca/taxes.

Did you know about our **Represent a Client** service? This secure online service lets you access tax information for clients who have authorized you. Online access to tax information becomes effective only after you have registered for the **Represent a Client** service and your client has authorized you.

For more information on registering and using the service, go to canada.ca/taxes-representatives.

Sincerely,

I. Hundeyin
T1 Specialty Services
Winnipeg Tax Centre and National Verification and Collections Centre
66 Stapon Road
Unit 592-21
Winnipeg, MB R3C 3M2

**Enclosure** 



THIS AGREEMENT MADE THE 2 DAY OF DECEMBER, 2017.

#### BETWEEN:

JORGE FELINO PEREIRA, of 116 West Creek Meadow, Chestermere, Alberta T1X 1T2.

(hereinafter referred to as "the Client")

- and -

PIPELLA LAW of Suite 200, Dorchester Square, 1333 – 8th Street SW, Calgary, AB T2R 1M6

(hereinafter referred to as "the Lawyers")

## CONTINGENCY FEE AGREEMENT

**THE CLIENT** hereby authorizes and instructs the Lawyers, acting in their professional capacity, to commence, prosecute, settle or litigate, acting reasonably and in the Client's best interest, an action to recover damages for personal injuries suffered by the Client as a result of a slip and fall accident, which occurred on **April 28, 2017**.

**AND WHEREAS** the Lawyers have agreed to act on behalf of the Client on the terms set forth below, and the Client wishes to instruct the Lawyers to proceed with the claim on the terms hereinafter set forth;

AND WHEREAS the Client and the Lawyers desire to make an agreement respecting the amount and manner of payment of the Lawyers' fees;

# NOW THEREFORE IT IS AGREED BETWEEN THE CLIENT AND THE LAWYERS AS FOLLOWS:

In consideration of the fees hereinafter set out, the Lawyers hereby agree to pay all the disbursements and other charges. For the purposes of this agreement, disbursements and other charges mean inter alia, refers but not limited to: all outof-pocket expenses required to fund this entire litigation, including all investigation expenses, filing fees, search fees, medical legal reports, expert opinions, treatment notes, photocopying costs, fax charges, long distance phone calls, any amounts paid to parties who provide legal research services, the premium for Legal Expense insurance and any other expenditures required during the course of this litigation.

- That in consideration of the professional services to be rendered by the Lawyers in commencing, prosecuting, settling or litigating the proposed action, the Lawyers will receive compensation upon the following terms:
  - (a) A fee being a percentage of the settlement or judgment, obtained for the Client, which percentage shall be as follows:
    - i. An amount equal to <a href="Twenty-seven">Twenty-seven</a> (27.0%) <a href="Percent">PERCENT</a> of the amount recovered for all damages inclusive of pre-judgment and post-judgment interest, plus taxable cost fees, should the said action result in consent Judgment or settlement in favour of the Client prior to commencement of Questioning;
    - ii) An amount equal to <u>THIRTY (30.0%) PERCENT</u> of the amount recovered for all damages inclusive of pre-judgment and post-judgment interest, plus taxable cost fees, should the said action result in settlement after commencement of Questioning but prior to setting the matter down for trial;
    - An amount equal to <a href="https://doi.org/10.2016/jhtml/">THIRTY-THREE AND ONE THIRD (33 1/3%)</a>
      <a href="https://doi.org/">PERCENT</a> of the amount recovered for all damages inclusive of prejudgment and post-judgment interest, plus taxable cost fees, should the said action be set down for trial</a>
- 3. Further, the Lawyers shall recover all the disbursements and other charges, which have been incurred during the course of this litigation.
  - (a) The Client shall pay the bank interest rate plus 5.0% on disbursements and other charges, paid by the Lawyers during the course of this litigation.

- (b) The maximum rate for Lawyers' fees shall not be greater than 33 1/3% of the net amount recovered after deduction for all disbursements, other charges, and interest on disbursements and other charges
- (c) The Client further agrees to pay to the Lawyers the GOODS AND SERVICES TAX on the Lawyers' fees, disbursements, and other charges.
- 4. The Client understands that taxable fees may be recovered in the proposed action which shall consist of fees as outlined in Schedule "C" of the Alberta Rules of Court and it is hereby recognized that:
  - the taxable fees are intended to be a complete or partial reimbursement of the Client's legal expenses;
  - (b) the taxable fees are the Client's property and that by signing this Contingency Fee Agreement, the Client is waiving the right to the portion of these fees payable to the Lawyers to the same percentage mentioned under paragraph 2 of this Agreement;
  - (c) the taxable fees retained by the Lawyers will be in addition to the Lawyers' percentage of the settlement or judgment;
  - (d) the percentage of taxable fees that may be received by the Lawyers may not exceed the percentage of the judgment or settlement that the Lawyers are entitled to receive in legal fees, under paragraph 2 of this Agreement; and
  - (e) the Client agrees to pay to the Lawyers, any Goods and Services tax, or similar taxes in respect to the percentage of taxable fees paid to the Lawyers.
- 5. When recovery is made by settlement, trial or appeal, the Lawyers will deduct all unpaid or unrecovered disbursements and other charges from the recovery.

- 6. The Client further agrees that, in the event of the Client wishing to change counsel at any time during the course of the proposed action, that the Lawyers shall have the right to impose a solicitors' lien on the file. The Client's file will be released under trust conditions which will outline that the Lawyers' fee shall be determined on a pro-rata basis at the conclusion of the action, between all firms that have acted for the Client. The pro-rata split of fees will be based on a *quantum meruit* analysis factoring in lawyers' time, articling students' time, paralegals' time, legal assistants' time, professional staff time, and any other factor that is appropriate to consider in the circumstances. The paralegal time will be calculated at the 2017 rate in the amount of \$185.00 per hour. In addition, the Client agrees that the disbursements and other charges, incurred by the Lawyers up to the date of the change of counsel, shall be paid within thirty (30) days of the transfer of the Client's file. The Client will also pay the bank interest rate plus 5% on disbursements and other charges as outlined in paragraph 2(c) of this agreement at the same time.
- 7. This agreement shall in no way preclude the Client from discharging the Lawyers. In such event, the Lawyers' fee, on an hourly basis, shall be paid forthwith for all professional services rendered on the Client's behalf. The Lawyers' fee on an hourly basis, will be based on reasonable commercial rates for all lawyers, articling students, paralegals, legal assistants, accountants and other staff, that worked on the Client's file. The Client will also pay for all disbursements and other charges incurred by the Lawyers up to the time of discharge. In addition, the Client will also pay the bank interest rate plus 5% on disbursements and other charges as outlined in paragraph 2(c) of this agreement. These amounts will be paid immediately upon discharge and prior to release of the file contents to the Client.
- 8. In the event that any adverse legal costs are awarded against the Client by the Court, those costs will be the Client's sole responsibility to pay and will not be borne by the Lawyers. Furthermore, in the event that security for costs is ordered by the Court in relation to this action, the amount of that security shall be forthwith paid into Court by the Client not the Lawyers.

- 9. I have been advised of the option of purchasing Legal Expense insurance through Redress Risk Management Incorporated. This Legal Expense insurance would indemnify me up to \$100,000.00 in accordance with the policy for any adverse costs award or any outstanding disbursements owed to the Lawyers in the event that I am not successful in this action. The premium of \$1,350.00 + GST for Legal Expense insurance will be treated as a disbursement and paid by me at the conclusion of my action.
  - (a) Yes, I want Legal Expense insurance. <u>J.P.</u> (initial)
  - (b) No, I am declining Legal Expense insurance. I understand that this insurance will not be available for purchase at a later date and acknowledge my personal responsibility for payment of adverse legal costs pursuant to paragraph 8 of this agreement. \_\_\_\_\_ (initial)
- 10. In the event that the Lawyers recommend a settlement and the Client refuses to accept it, the Lawyers have the right to withdraw from the action, and in such event, the Lawyers' fee shall be determined referred to in paragraph 6.
- 11. In the event of the Client's death during the course of this litigation, this agreement shall be binding upon the deceased Client's estate and next of kin.
- 12. It is agreed that any material misrepresentation by the Client may be grounds for the Lawyers, at their sole discretion, to cease to act and render their account for fees, as herein before referred to in paragraph 7. The Client will also pay disbursements and other charges along with the interest calculated thereon, forthwith. It is further agreed that payment thereof shall be made within thirty (30) days, failing which interest at twelve (12%) percent per annum on unpaid balances, up to the date of actual payment, shall be charged and paid.
- 13. If the Client gives notice in writing to the Lawyers within five (5) days after the Client's copy of this agreement is served on the Client, the Client may terminate this agreement, without incurring any liability for the fees, but the Client is liable to

reimburse the Lawyers for reasonable disbursements, incurred prior to notice of termination being given.

- 14. An Assessment Officer may, on the Client's request, review this agreement and any account rendered under it. This agreement and any account rendered under it, may be further reviewed by a Judge of the Court of Queen's Bench, on the Client's request, or, on the Assessment Officer's request.
- 15. Notices to the Client shall be deemed "served," if sent single-registered post to the address noted hereon, or the address last provided by the Client.
- 16. The Client further agrees to advise the Lawyers in writing of any change of address or phone numbers within five (5) days of such change, and failure to do so, shall release the Lawyers from any obligation to make efforts to locate the Client, or to institute, or to continue to proceedings, or to take any steps whatsoever to protect the Client's claim.
- 17. In addition to advancing the Client's own claims under this agreement, the Lawyers may also advance any subrogated claims that arise as a result of the Client's injuries, (e.g. Alberta Health and/or disability insurers). Any fee charged to such other entity shall be the responsibility of that entity and not the Client.

IN WITNESS WHEREOF I have hereunto set my hand and seal this \_\_\_\_ day of December. 2017.

LuCinda Eby,

Witness

ORGE FELINO PEREIRA

# TARA D. PIPELLA PROFESSIONAL CORPORATION

Per: 2

Loretta Murphy

# AFFIDAVIT OF EXECUTION

CANADA	)	l, LuCinda Eby,
PROVINCE OF ALBERTA	)	of the City of Calgary
TO WIT:	)	in the Province of Alberta
	)	Paralegal
MAKE OATH AND SAY:		

- 1. **THAT** I was personally present and did see Jorge Felino Pereira, Astra Richardson-Pereira, named in the attached Contingency Fee Agreement, who are personally known to me to be the persons named therein, duly sign, seal and execute the same for the purposes named therein.
- 2. **THAT** the said Contingency Fee Agreement, was executed at the City of Calgary, in the Province of Alberta, Canada and that I am a subscribing witness thereto.
- 3. **THAT** I know the said Jorge Felino Pereira and Astra Richardson-Pereira, and they are, in my belief, of the full age of 18 years.

**SWORN BEFORE ME** at the City of Calgary, in the Province of Alberta, Canada, this 7<sup>th</sup> day of December, 2017.

A Commissioner for Oaths in and for the Province of Alberta

LuCinda Eby

JAIME D. FETTIG
A Commissioner for Oaths
In and for Alberta
{00094538vIMy Commission Expires Sept 7, 201

# Affidavit of Jorge Felino Pereira

Jorge Felino Pereira of Chestermere, in the Province of Alberta, affirm that:

- I am the husband of Astra Neasha Richardson-Pereira and the father of Isaiah David Felino Richardson-Pereira. I have uncovered matters and facts which are set forth in this affidavit. The information set out in this affidavit is to be true to the best of my recollection and knowledge.
- I write this affidavit because I am surprised that my signature is on the contingency agreement from the 8th of December 2017, in regards to my wife's "Slip & fall" - accident, which occurred on April 28, 2017.
- Firstly because it is my wife who had the slip and fall accident and not myself, and therefore I see no need for my signature for a contingency and insurance between Pipella Law and myself.
- 4. Secondly, because I signed this document in good faith, thinking this was only for insurance purposes.
- 5. This document was signed at Pipella Laws' office and presented as a necessity in regards to my wife's case, and nothing else.
- 6. I have only signed one other document with Pipella Law since then, in regards to becoming our son's legal guardian (Feb. 18'th, 2020).
- 7. Pipella Law has not reached out to me since then.
- 8. I am deeply appalled by the way Pipella Law has treated my wife and this case.
- 9. Pipella Law was well aware that I was born in Denmark and English is my third language. I am not a lawyer and coupled with the fact that English is my third language, Pipella Law was aware of this fact and took advantage of it to deceive me into signing a document I would have never signed, if I understood what I was signing.
- 10. I am appalled that Pipella Law would deceive me in this manner.
- 11. If I knew this was a contingency agreement for a Slip and fall that I did not have, I never would have signed this because I do not break the law.

Kolding, Denmork 28/9-2.



This is to certify that Jorge Felino Pereira today in my presence at the Notarial Office approved and signed the above document. No conspicuous corrections or addenda were found in the document.

Jorge Felino Pereira has proved his/her identity by showing passport,

The Court in Kolding, 28. september 2021.

Karen Kring Notary Public









# Court of Queen's Bench of Alberta

**CLERK OF THE COURT FILED** 

**AUG 2 3 2022** 

CALGARY, ALBERTA

Date:

Citation: Richardson v MacDonald, 2022 ABQB 566

**Dockets:** 2201 02896, 2201 03422

Registry: Calgary

Between:

Docket 2101 02896

Dale J. Richardson

**Applicant** 

- and -

Cst. J MacDonald #5450 Calgary Police, Unknown Member 1 RCMP K Division, Unknown Member 2, RCMP K Division, Cst. Burton Roy, RCMP F Division, Cst. Reid, RCMP F Division, Cst. Parchewski, RCMP F Division, Cst. Reed, RCMP F Division, Cst. Rivest RCMP F Division, Province of Saskatchewan, Court of Queen's Bench for Saskatchewan, Justice R.W. Elson, Justice N.D. Crooks, Court of Appeal for Saskatchewan, the Honourable Gordon Wyantt Attorney General of Saskatchewan, Kimberley Anne Richardson

Respondents

And Between:

Docket 2201 03422

Dale J. Richardson

**Applicant** 

- and -

Justice Karen Horner, the Attorney General of Canada for the RCMP and themselves, and Kimberley Richardson

Respondents

CLERK OF THE COUNTY
FILED
AUG 2 3 2022

CALGARY, ALBERTA

# Memorandum of Decision of the Associate Chief Justice J.D. Rooke

- [1] Dale J. Richardson [Mr. Richardson] is an abusive litigant who is operating in Alberta, Saskatchewan, and Federal Courts. Recently, this Court struck out two proceedings by Mr. Richardson pursuant to Civil Practice Note No. 7 as hopeless and abusive proceedings: *Richardson v MacDonald*, 2022 ABQB 317 [*Richardson #4*]. Brown J of the Federal Court has recently designated Mr. Richardson as a "vexatious litigant", and imposed global and indefinite *Federal Courts Act*, RSC 1985, c F-7 s 40 court access restrictions on Mr. Richardson in *Richardson v Seventh-Day Adventist Church*, 2022 FC 848 [*Richardson FC*].
- [2] In *Richardson #4* at para 25, I concluded that Mr. Richardson's evolving pattern of expanding, aggressive, and abusive litigation potentially warranted steps in this Court to better manage Mr. Richardson's misconduct. I, therefore, invited the Respondents named in the above styles of cause to initiate *Judicature Act*, RSA 2000, c J-2, ss 23-23.1 proceedings to impose gatekeeping safeguards on Mr. Richardson's activities before the Alberta Court of Queen's Bench. On May 25, 2022, Canada responded that it would file an application of that type. At present, Mr. Richardson is subject to interim court access restrictions, pending completion of the *Judicature Act* ss 23-23.1 process: *Richardson #4*.
- [3] This Decision responds to a further additional issue that has emerged with Mr. Richardson. Mr. Richardson has adopted the pattern of bulk emailing the Court and my Office with voluminous but irrelevant attachments. Examples of this activity are described in previous decisions in relation to Mr. Richardson, for example: *Richardson v MacDonald*, 2022 ABQB 274 at paras 2-9 [*Richardson #3*]. Docket records for Mr. Richardson's Federal Court activities, and the *Richardson FC* Decision, indicate the same issue is occurring before that Court.
- [4] What aggravates Mr. Richardson's activity even further are two more repeating patterns:
  - 1. Mr. Richardson's materials are not merely voluminous, but contain allegations and claims that Brown J (in *Richardson FC*) accurately characterized as "egregious, intemperate, distasteful". What Mr. Richardson states in the documents he sends to Court is nothing less than hate speech directed to religious groups, government employees and officers, and court actors.
  - 2. Mr. Richardson is using proxy actors to communicate and interact with the Court, at least in part to evade litigation management and expand his actions: **Richardson FC**; **Richardson #3**.
- [5] What follows are several examples of Mr. Richardson's inappropriate email communications. On July 12, 2022, Mr. Richardson, as "Chief Executive Officer of DSR Karis Consulting Inc.", emailed Chief Justice Moreau of this Court, with that email and attachment copied to over a hundred email addresses, including multiple addresses in this Court. The July 12, 2022 correspondence, titled, in a clearly defamatory manner, "For Greater Certainty to

Report Crimes of "Rooke the Crook", is an obvious attempt to collaterally attack this Court's decisions and interim steps to manage Mr. Richardson's problematic activity. Furthermore, Mr. Richardson engaged in "judge shopping" by attempting to circumvent my authority, alleging "fraud" and "unjust interference". This correspondence also (allegedly) unilaterally prohibits transmission and sharing of the July 12, 2022 with myself. Mr. Richardson has previously attempted much the same strategy on April 1, 2022, writing Chief Justice Moreau and demanding I am removed from Mr. Richardson's litigation.

- [6] A further example is an August 15, 2022 email from Mr. Richardson to my Office and many other email addresses. Though Mr. Richardson's documents are difficult to understand, it appears he disagreed with the outcome of *Richardson #3* and *Richardson #4*, and now demanded steps and answers on what are, at best, potential appeal grounds. He is obviously in the wrong court for that. The language in the email and its attachments is, as Brown J of the Federal Court of Canada observed, inflammatory and offensive. In this instance Mr. Richardson has used a different email address: unity@dsrkarisconsulting.com.
- [7] Mr. Richardson now has an established pattern of ignoring Court instructions, Court *Rules*, and using irregular and improper documents in his attempts to bypass and disrupt Court proceedings. One common thread in Mr. Richardson's improper litigation conduct is his repeated and abusive use of email as the vector for his activities.
- [8] This Court's inherent jurisdiction includes imposing limits and structures on communications where a litigant is abusing the Court: e.g. *Re Boisjoli*, 2015 ABQB 690; *McKechnie (Re)*, 2018 ABQB 677; *McClelland v Harrison*, 2022 ABQB 554. This communications management process is also used by the Alberta Court of Appeal: e.g. *Feeney v Her Majesty the Queen in the Right of Alberta*, 2021 ABCA 255. I conclude that Mr. Richardson's repeated abuse of email to subvert and bypass court processes requires additional interim litigant management steps.
- [9] This step also complies with Wagner CJC's recent instruction in *British Columbia* (Attorney General) v Council of Canadians with Disabilities, 2022 SCC 27 at para 1, where the Chief Justice defined "access to justice" means courts shall take steps to efficiently respond to problem litigation, so as to maintain access to timely remedies for those who deserve them:

Access to justice depends on the efficient and responsible use of court resources. Frivolous lawsuits, endless procedural delays, and unnecessary appeals increase the time and expense of litigation and waste these resources. To preserve meaningful access, courts must ensure that their resources remain available to the litigants who need them most — namely, those who advance meritorious and justiciable claims that warrant judicial attention. [Emphasis added.]

[10] I order that Mr. Richardson is prohibited from communicating with the Alberta Court of Queen's Bench by email, except where Mr. Richardson is represented by a member in good standing of the Law Society of Alberta, or another person authorized to represent Mr. Richardson, in the Alberta Court of Queen's Bench, pursuant to the *Legal Professions Act*, RSA 2000, c L-8. This prohibition applies to both Mr. Richardson, and his litigation proxies. This communications protocol will continue on an interim basis until the impending *Judicature Act* ss 23-23.1 process is completed.

- [11] To be explicit, Mr. Richardson may submit documents by attending the Court, by mail, courier, or a lawyer. However, no further email communications or electronic document submissions will be accepted from Mr. Richardson or his proxies. I caution Mr. Richardson that if he wishes to participate in, and respond to, the impending *Judicature Act* ss 23-23.1 process, he must submit any written argument and/or affidavit evidence via a physical document. I also caution Mr. Richardson that if he does not comply with this Court's instructions and continues to abuse the Court's processes, then he may be subject to additional steps, including *Rule* 10.49(1) penalties.
- [12] I am aware that Mr. Richardson will likely disagree with this step. Mindful of my obligations set in *Pintea v Johns*, 2017 SCC 23 to provide information to self-represented litigants, such as Mr. Richardson, concerning their litigation options, if Mr. Richardson disagrees with this outcome, his remedy is an appeal to the Alberta Court of Appeal.
- [13] The Court will prepare the Order giving effect to this Decision. Mr. Richardson's approval of that Order is dispensed with, pursuant to *Rule* 9.4(2)(c). This Decision and the corresponding Order shall be served on Mr. Richardson to the email addresses he has used in his communications with my Office: dale.richardson@dsrkarisconsulting.com, and unity@dsrkarisconsulting.com.

**Dated** at the City of Calgary, Alberta this 23<sup>rd</sup> day of August, 2022.

J.D. Rooke A.C.J.C.Q.B.A.

**Appearances:** 

None

COURT FILE NUMBER

2201 02896, 2201 03422

COURT

Court of Oueen's Bench of Alberta

JUDICIAL CENTRE

Calgary

APPLICANT

Dale J. Richardson

RESPONDENTS

Cst. J MacDonald #5450 Calgary Police, Unknown Member 1 RCMP K Division, Unknown Member 2, RCMP K Division, Cst. Burton Roy, RCMP F Division, Cst. Reid, RCMP F Division, Cst. Parchewski, RCMP F Division, Cst. Reed, RCMP F Division, Cst. Rivest RCMP F Division, Province of Saskatchewan, Court of Queen's Bench for Saskatchewan, Justice R.W. Elson, Justice N.D. Crooks, Court of Appeal for Saskatchewan, the Honourable Gordon Wyantt Attorney General of Saskatchewan, Kimberley Anne Richardson; Justice Karen Horner, the Attorney General of

Canada for the RCMP and themselves.

**DOCUMENT** 

## INTERIM COMMUNICATIONS RESTRICTION ORDER

AND CONTACT

INFORMATION OF THE

PARTY FILING THIS

**DOCUMENT** 

ADDRESS FOR SERVICE Associate Chief Justice J.D. Rooke, Alberta Court of Queen's

Bench, Judicial District of Calgary Calgary Courts Centre, 601 5 St S.W.

Calgary, Alberta T2P 5P7

I hereby certify this to be a true copy of

the original \_\_\_\_\_\_

Dated this day of

DATE ON WHICH ORDER WAS PRONOUNCED:

August 23, 2022

LOCATION WHERE ORDER WAS PRONOUNCED:

Calgary, Alberta

NAME OF THE JUDGE WHO MADE THIS ORDER:

Honourable Associate Chief Justice

J.D. Rooke

UPON this Court's receipt and review of email communications from Dale J. Richardson:

AND UPON the Court's conclusion that Dale J. Richardson uses email to communicate with the Court in an inappropriate, abusive manner;

AND PURSUANT to this Court's decision reported as *Richardson v MacDonald*, 2022 ABQB 566;

# AND UPON THE COURT'S OWN MOTION AND UNDER ITS INHERENT JURISDICTION;

## IT IS HEREBY ORDERED THAT:

- 1. Dale J. Richadson is prohibited from any communication with the Alberta Court of Queen's Bench by email, except where Dale J. Richardson:
  - a) has received specific authorization by a Court order to use email communications, or
  - b) is represented by a member in good standing of the Law Society of Alberta, or another person authorized to represent Dale J. Richardson, in the Alberta Court of Queen's Bench, pursuant to the *Legal Professions Act*, RSA 2000, c L-8.
- 2. For clarity, this prohibition applies to all emails from Dale J. Richardson to any Court staff, employees, officers, and justices, including Clerks of the Court, Court Coordinators, and Judicial Assistants.
- 3. For further clarify, this prohibition applies to filing or submitting documents to the Alberta Court of Queen's Bench, its justices, staff, officers, and employees.
- 4. Any email communication received from Dale J. Richardson, shall be immediately deleted without any response or acknowledgment.
- 5. The approval of Dale J. Richardson, as to the form and content of this Order, is not required per  $Rule\ 9.4(2)(c)$ .
- 6. This Order and the *Richardson v MacDonald*, 2022 ABQB 566 Decision shall be served on Dale J. Richardson to the email addresses: dale.richardson@dsrkarisconsulting.com, and unity@dsrkarisconsulting.com.

J.D. Rooke

ASSOCIATE CHIEF JUSTICE OF QUEEN'S

BENCH OF ALBERTA