

Form 3-15A
(Rule 3-15)

COURT FILE NUMBER QBG-BF-00015-2022

COURT OF KING'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE BATTLEFORD

PLAINTIFF/
DEFENDANT BY
COUNTERCLAIM SYNERGY CREDIT UNION LTD.

DEFENDANT/
PLAINTIFF BY
COUNTERCLAIM TRICIA DARLENE NOBLE, also known as
TRICIA DARLENE McDONALD

**STATEMENT OF DEFENCE TO COUNTERCLAIM
ON BEHALF OF SYNERGY CREDIT UNION LTD.**

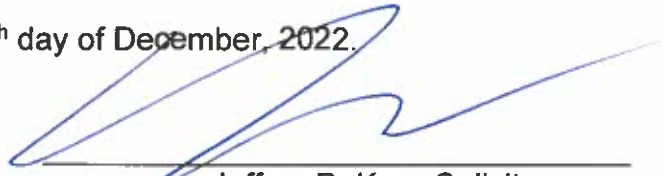
1. The Plaintiff, (Defendant by Counterclaim), SYNERGY CREDIT UNION LTD., denies each and every allegation in the Counterclaim and puts the Defendant, (Plaintiff by Counterclaim) to the strict proof thereof.
2. The Plaintiff, (Defendant by Counterclaim), states at no time has it failed to provide payment to the Defendant (Plaintiff by Counterclaim) (of any amounts owing under its Profit Share Program that were properly due and owing to her and that it has complied strictly with the terms of its Profit Share Agreement as mandated both by *The Credit Union Act* and under the terms of its Bylaws and all contractual obligations.
3. The Plaintiff, (Defendant by Counterclaim), states that it did not wrongfully or maliciously commence any legal action including any such foreclosure against the Defendant (Plaintiff by Counterclaim).
4. The Plaintiff, (Defendant by Counterclaim), states that at all times it has provided all information regarding the membership of the Defendant (Plaintiff by Counterclaim) as required by *The Credit Union Act* and any regulatory or administrative governments body.

5. In response to the Statement of Defence and Counterclaim of the Defendant (Plaintiff by Counterclaim) globally, the Plaintiff (Defendant by Counterclaim) states that it has undertaken no improper steps in dealing with the Defendant (Plaintiff by Counterclaim) or failed to comply with any of its obligations for disclosure, fair dealing, notice.
6. The Plaintiff (Defendant by Counterclaim), further states that none of the assertions of the Defendant (Plaintiff by Counterclaim) (which are not admitted but denied) provide a defence to its assertions of libel and slander or frivolous and vexatious action.

NOTICE

If you intend to make a reply to this Statement of Defence to Counterclaim, you must serve and file the reply within 8 days after service of the Statement of Defence to Counterclaim.

DATED at Lloydminster, Alberta, this 7th day of December, 2022.



Jeffrey D. Kerr, Solicitor

CONTACT INFORMATION AND ADDRESS FOR SERVICE

If prepared by a lawyer for the party:

Name of firm:	PSM LLP
Name of lawyer in charge of file:	JEFFREY D. KERR
Address of legal firm:	PO Box 20 Stn Main 5009 – 47 Street, Lloydminster, SK/AB S9V 0X9
Telephone number:	(780) 875-2288
Fax number (<i>if any</i>):	(780) 875-3479
Email address (<i>if any</i>):	jeff@psmlaw.ca

Form 12-3
(Subrule 12-3(1))

COURT FILE NUMBER QBG-BF-00015-2022

COURT OF KING'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE BATTLEFORD

PLAINTIFF SYNERGY CREDIT UNION LTD.

DEFENDANT TRICIA DARLENE NOBLE, also known as
TRICIA DARLENE McDONALD

ACKNOWLEDGEMENT OF SERVICE

You are asked to fill out and sign this form without delay, and to return it by fax to **PSM LLP Attention: Jeffrey D. Kerr, at 780-875-3479 or by email at jeff@psmlaw.ca**. If you do not return this signed and completed Acknowledgement of Service without delay, you may not receive notice of any further proceedings or any documents may be personally served on you and you will be required to pay the costs of service.

I acknowledge service on me of a copy of the following document:

1. Statement of Defence to Counterclaim on behalf of Synergy Credit Union Ltd. dated December 7, 2022.

I am:

- authorized to accept service on behalf of TRICIA DARLENE NOBLE, also known as TRICIA DARLENE McDONALD, being a lawyer.



(signature)

December 7, 2022

(date of service)

My name is: MARK VANSTONE

The address for service of TRICIA DARLENE NOBLE, also known as TRICIA DARLENE McDONALD is (address in Canada where Court documents may be mailed or left):

Vanstone Law

1221 – 10th Street East

Saskatoon, SK, S7H 0J1

My telephone number is: 1-306-667-1988

My fax number is (optional): 1-306-700-7784

My e-mail address is (see Notice): mvanstone@vanstone.law

NOTICE

(1) You must include an address in Canada where documents may be mailed to or left for you if you wish to receive notice of subsequent proceedings in this matter. Your address for service must include an e-mail address if you are represented by a lawyer or if your address for service is located outside Saskatchewan. Otherwise, including an e-mail address is optional. It is also optional to include a fax number.

(2) When an e-mail address or a fax number is included in your address for service, documents may be served on you by e-mail or fax.

(3) The address, fax number or e-mail address that you give on this form will be used to serve you with documents until you serve on the other parties and file with the court written notice of a new address for service.

CONTACT INFORMATION AND ADDRESS FOR SERVICE

If prepared by a lawyer for the party:

Name of firm:	PSM LLP
Name of lawyer in charge of file:	JEFFREY D. KERR
Address of legal firm:	PO Box 20 Stn Main 5009 – 47 Street, Lloydminster, SK/AB S9V 0X9
Telephone number:	(780) 875-2288
Fax number (if any):	(780) 875-3479
Email address (if any):	jeff@psmlaw.ca