

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.**

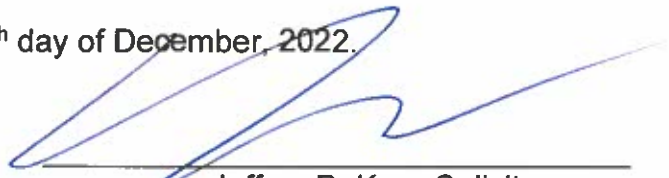
1. The Plaintiff, (Defendant by Counterclaim), SYNERGY CREDIT UNION LTD., denies each and every allegation in the Counterclaim and puts the Defendant, (Plaintiff by Counterclaim) to the strict proof thereof.
2. The Plaintiff, (Defendant by Counterclaim), states at no time has it failed to provide payment 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:

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