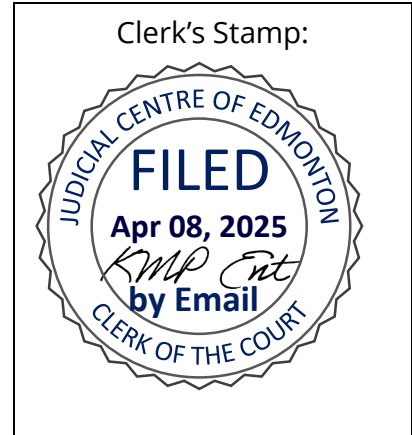


COURT FILE NO. 2503 03094
COURT COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE EDMONTON



PLAINTIFFS/
RESPONDENTS LORI HAND, OLGA COLLINS, LISA WOLFS, and SCARLETT MARTYN
DEFENDANTS/
APPLICANTS ROCCO GALATI LAW FIRM PROFESSIONAL CORPORATION, ROCCO
GALATI, CONSTITUTIONAL RIGHTS CENTRE INC.
DOCUMENT **APPLICATION BY ROCCO GALATI LAW FIRM PROFESSIONAL
CORPORATION, DEFENDANT**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	McLENNAN ROSS LLP #600 McLennan Ross Building 12220 Stony Plain Road Edmonton, AB T5N 3Y4	Lawyer: Ken Fitz Telephone: 780.482.9231 Fax: 780.733.9713 Email: ken.fitz@mross.com File No.: 20251072
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**NOTICE TO RESPONDENTS: LORI HAND, OLGA COLLINS, LISA WOLFS and
SCARLETT MARTYN**

**This application is made against you. You are a Respondent. You have the right to
state your side of this matter before the Court.**

To do so, you must be in Court when the application is heard as shown below:

Date: ~~April 9, 2025~~ April 25, 2025 AJ2
Time: 10:00 AM
Where: Law Courts, 1A Sir Winston Churchill Square, Edmonton, AB T5J 0R2
Before Whom: Applications Judge in Chambers

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

Remedy claimed or sought:

1. An Order dismissing or alternatively, staying, the within Action on the grounds that this Honourable Court does not have jurisdiction to hear this Action;
2. Alternatively, an Order staying the within Action on the grounds that this Honourable Court is *forum non conveniens* for the issues to be tried in this Action;
3. An Order setting aside any Order permitting service of the Statement of Claim outside the Province of Alberta;
4. An Order setting aside any service of the Statement of Claim;
5. An Order for costs of this Application; and
6. Such further and other relief as this Honourable Court may deem just and appropriate in the circumstances.

Grounds for making this application:

7. The Applicant Rocco Galati Law Firm Professional Corporation has been served with a copy of the Statement of Claim filed in the within Action although the named Defendant Rocco Galati has not been served with a copy of the Statement of Claim.
8. The Action has no real and substantial connection with the Province of Alberta.
9. The Action has a real and substantial connection with other jurisdictions.
10. The other jurisdictions, namely the Province of Ontario, are more convenient and appropriate forums for the pursuit of the Action and for securing the ends of justice;
11. The other jurisdictions are more preferable jurisdictions to litigate the issues in dispute having regard to all of the circumstances;
12. The Applicant is not a resident in the Province of Alberta and the Applicant does not carry on business in the Province of Alberta.
13. All of the witnesses that will be called in the defence of this action by Rocco Galati Law Firm Professional Corporation reside outside the Province of Alberta and are largely, if not entirely, in the Province of Ontario.
14. All, or substantially all, of the physical evidence and documentation of Rocco Galati Law Firm Professional Corporation is located in the Province of Ontario.
15. The proper forum for the hearing of the issues raised in the Action is the Province of Ontario.

Material or evidence to be relied on:

16. Affidavit of Alex Bernet, filed.

Applicable rules:

17. Rule 1.2, 1.3, 1.4, 1.7, 3.68, 11.25 and 11.31 of the Alberta *Rules of Court*, A.R. 124/2010.

Applicable Acts and Regulations:

18. None.

Any irregularity complained of or objection relied on:

19. This Honourable Court is not the *forum conveniens*.

20. This Honourable Court does not have jurisdiction to hear the within Action.

21. Any purported service did not comply with Rule 11.25.

How the application is proposed to be heard or considered:

22. Before a Justice in Chambers at a Special Chambers Application.

AFFIDAVIT EVIDENCE IS REQUIRED IF YOU WISH TO OBJECT.

WARNING

If you do not come to Court either in person or by your lawyer, the Court may give the Applicants what they want in your absence. You will be bound by any order that the Court makes. If you want to take part in this application, you or your lawyer must attend in Court on the date and time shown at the beginning of the form. If you intend to give evidence in response to the application, you must reply by filing an Affidavit or other evidence with the Court and serving a copy of that Affidavit or other evidence on the Applicants a reasonable time before the application is to be heard or considered.