

3

**THE KING'S BENCH  
Winnipeg Centre**

BETWEEN:

KEITH DOUGLAS STOWE

Plaintiff

- and -

TRANSX LTD.

Defendant

Nov 5 2024 14:53  
800 869223 2 CI 23-01-43676 122  
CHARGE/FEE PAID: 150.00

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**NOTICE OF MOTION**  
**Associate Judge's Uncontested List**  
**Hearing date: 13 November 2024 at 9:30 a.m.**  
20

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GREY WOWK SPENCER LLP  
#200, 5110-51 Avenue  
PO Box 1028  
Cold Lake, Alberta T9M 1P3

**LEIGHTON B.U. GREY, K.C.**

Telephone: (780) 594-0299  
Facsimile: (780) 594-0211

File No. CST-1.7

**FILED  
KING'S BENCH**

**NOV 05 2024**

**LAW COURTS  
WINNIPEG**

APPVD  
BB

**THE KING'S BENCH**

**Winnipeg Centre**

**KEITH DOUGLAS STOWE**

Plaintiff

And

**TRANSX LTD.**

Defendant

**NOTICE OF MOTION**

COUNSEL OF RECORD FOR THE PLAINTIFF will make a motion Without Notice, before the presiding Associate Judge on <sup>20</sup>13 November 2024, at 9:30 a.m. or as soon after that time as the motion can be heard, at 408 York Avenue, Winnipeg, Manitoba R3C 0P9.

The motion will be heard by teleconference. The call-in number and ID for the teleconference is as follows: Toll-free dial-in number: 1-855-342-6455 Conference ID Number 5589296.

THE MOTION IS FOR an Order granting Plaintiff Counsel be removed as counsel of record under Rule 15.03 of the *King's Bench Rules*:

THE GROUNDS FOR THE MOTION ARE:

1. There has been a serious loss of confidence between the lawyer and client under Rule 3.7-7 of the Code of Professional Conduct;
2. Counsel has an obligation to withdraw if discharged by a client where the client has not filed a Notice of Intention to Act in Person.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion: Affidavit of Lesley Doucet, sworn 23 September 2024.

24 October 2024

GREY WOWK SPENCER LLP  
c/o Leighton B.U. Grey, K.C.  
#200, 5110 51 Avenue  
Cold Lake, Alberta T9M 1P3  
Phone: (780) 594-0299  
Fax: (780) 594-0211  
Email: [lgrey@gwsllp.ca](mailto:lgrey@gwsllp.ca)  
File No. CST-1.7

TO: Keith Douglas Stowe  
Box 2506 Virden, MB  
R0M 2C0  
[keithstowe@hotmail.com](mailto:keithstowe@hotmail.com)  
Form 37A (page 1 of 1)

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**THE KING'S BENCH  
Winnipeg Centre**

**BETWEEN:**

**KEITH DOUGLAS STOWE**

**Plaintiff**

**And**

**TRANSX LTD.**

**Defendant**

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**AFFIDAVIT OF: LESLEY DOUCET**

**AFFIRMED: 23 September 2024**

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*GREY WOWK SPENCER LLP  
c/o Leighton B.U. Grey, K.C.  
#200, 5110 51 Avenue  
Cold Lake, Alberta T9M 1P3  
Phone: (780) 594-0299  
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Email: [lgrey@gwslp.ca](mailto:lgrey@gwslp.ca)  
File No. CST-1.7*

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**BETWEEN:**

**KEITH DOUGLAS STOWE**

**Plaintiff**

**And**

**TRANSX LTD.**

**Defendant**

I, Lesley Doucet, Legal Assistant of the City of Cold Lake, in Province of Alberta,  
**AFFIRM AND SAY THAT:**

1. I am a Legal Assistant for Plaintiff counsel of record, and as such have personal knowledge of the facts and matters hereinafter deposed to by me save and except where same are stated to be based upon information and belief, in which case I verily believe them to be true.
2. Between 4 and 11 December 2023 the Plaintiff sent a series of emails and persistent phone calls alleging conspiracy and surveillance of this action to myself and Plaintiff counsel. The Plaintiff's conduct became more irrational in particular during this period.
3. On 11 December 2023 Plaintiff counsel provided written notice to the Plaintiff of his intention to cease acting. A copy of that email is attached herein and marked **Exhibit "A"**. The Plaintiff responded by collecting his file materials in person at Plaintiff counsel's head office in Cold Lake, Alberta on 12 December 2024. ;
4. On 22 March 2024 I contacted the Court to determine whether the Plaintiff had yet filed a Notice of Intention to Appear in Person. The Plaintiff had not.
5. On 3 April 2024 courtesy copies of a draft Notice of Intention to Appear in Person were provided to the Plaintiff to expedite notice to the Court.

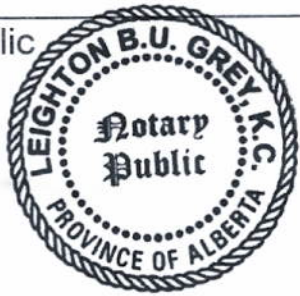
- 6. On 19 April 2024 I spoke with the Plaintiff who indicated that he planned to discontinue the Action.
- 7. On 2 August 2024 I performed a Court search, which indicated that the within action is still active.
- 8. I make this Affidavit *bone fide* and in support of an Order removing Plaintiff Counsel, Leighton B.U. Grey, K.C. as counsel of record.

SWORN BEFORE ME at the City of  
 Cold Lake, in the Province of Alberat,  
 this 23<sup>rd</sup> day of September, 2024.

*[Signature]*

---

Notary Public



*[Signature]*

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**LESLEY DOUCET**

From: keith stowe <keithstowe@hotmail.com>

Sent:

December 11, 2023 12:16 PM

To: Leighton Grey; Lesley Doucet

Subject: Re: On route to cold lake to pick up a copy of lawyer/client communications

I will pay costs to compile the requested information.

The Manitoba lawyer code of conduct states that a lawyer operating in Manitoba must be clear when communicating with a client, I do not feel this has occurred in my situation, so I am on route to obtain all documents and communications pertaining to myself.

I informed you I suspect our communications are not secure and someone may have been communicating with you on my behalf. Prior to approaching police, I must obtain some evidence to support any claim I present them with and a copy of all my communications with your office will provide the required information to determine if an offense has occurred.

As to the information within my file, I believe I have every legal right to request and obtain. If you chose to refuse to provide my the requested information, please do so in a written and signed letter that I will pick up Tuesday afternoon or Wednesday morning.

I learnt about a week ago that you were representing myself directly and not within a class action lawsuit as I understood a class action to be.

You are legally obligated to communicate with myself to communicate aspects of my case with you. This is the second time I've requested information about your representation of myself and this is the second time you've refused to provide myself important information connected to your representation of myself. I want your third refusal in a written and signed document.

Thanks for your time and patience.

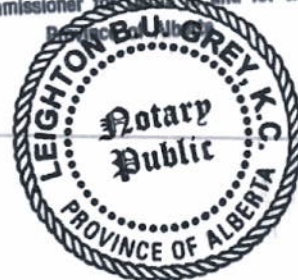
Keith Stowe

I will be at your cold lake office Tuesday afternoon or Wednesday morning

This is Exhibit **A** referred to in the Affidavit of **Lesley Doucet** Sworn before me this **23<sup>rd</sup>** day of **September** A.D., 20**24**  
A Commissioner for Oaths and for the

Get Outlook for Android

From: Leighton Grey <LGrey@gwsllp.ca>  
Sent: Monday, December 11, 2023 1:18:29 PM  
To: keith stowe <keithstowe@hotmail.com>; Lesley Doucet <LDoucet@gwsllp.ca>  
Subject: RE: On route to cold lake to pick up a copy of lawyer/client communications



Mr. Stowe:

*You are already in possession of everything on our file. We are not required to reproduce all of these materials at our cost.*

*We shall immediately file our Notice of Ceasing to Act. I will not be in Cold Lake tomorrow.*

Regards,



Grey Wowk Spencer

Leighton B.U. Grey, K.C.

BA (Distinction) LL.B.

Attorney of AB (1999), SA (2004), and LL.M. (2008) Law Society of

Senior Partner (Licensed Member) | Grey Wowk Spencer LLP

#200, 5110-51 Ave; Box 1028 - Cold Lake, Alberta T9M 1P3 | Ph: 780.594.0299 | F: 780.594.0211

#202, 4702 - 1<sup>st</sup> Street SW (Calgary, Alberta T2G 0A2) | Ph: 403.543.9955 | F: 403.543.9956

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**From:** keith stowe <[keithstowe@hotmail.com](mailto:keithstowe@hotmail.com)>

**Sent:** Monday, December 11, 2023 12:13 PM

**To:** Leighton Grey <[LGrey@gwsllp.ca](mailto:LGrey@gwsllp.ca)>; Lesley Doucet <[LDoucet@gwsllp.ca](mailto:LDoucet@gwsllp.ca)>; Megan Gurski <[MGurski@gwsllp.ca](mailto:MGurski@gwsllp.ca)>

**Subject:** On route to cold lake to pick up a copy of lawyer/client communications

He'll Lesley,

I am departing Virden Manitoba today, I am on route to your Cold Lake Office.

I am coming to pick up a digital copy of all emails, internet/group calls /discussions you've have with my group in a digital and paper format.

I want a digital and paper copy of all meeting agendas and meeting minutes in a digital and paper format.

I want a copy off all phone call notes , emails, mail, faxes, etc your office has had with myself in a digital and paper format.

I want a copy off all phone call notes , emails, mail, faxes, etc your office has had with transx on my behalf in a digital and paper format.

Since your office prepared my statement of claims, with the intent that a party other than your office might be defending the Pointe you presenter in my statement of claims, I want the defenses your office has prepared to defend those points in court and against Transx.

The digital format I am requesting can be either micro sd memory card or a memory stick.

I should arrive at your Cold Lake Office Tuesday afternoon.

Thanks

Keith Stowe

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