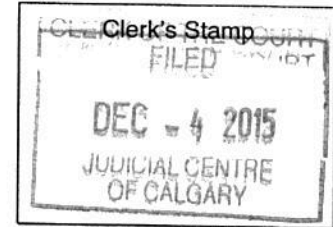


COURT FILE NUMBER 1501-11817
COURT COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY
PLAINTIFFS EASY LOAN CORPORATION AND MIKE TERRIGNO
DEFENDANTS BASE MORTGAGE & INVESTMENTS LTD., BASE FINANCE LTD. ARNOLD BREITKREUTZ, SUSAN BREITKREUTZ, SUSAN WAY, AND GP ENERGY INC.
PLAINTIFFS EASY LOAN CORPORATION AND MIKE TERRIGNO
DOCUMENT **NOTICE OF MOTION**



ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT RIVERSIDE LAW OFFICE
Attention: Christopher M.A.Souster
Barrister & Solicitor
4108 Montgomery View N.W.
Calgary, AB T3B 0L9
Phone: (403) 685-4224
Fax: (403) 685-4225
E-mail: cmas@riversidelawoffice.ca

NOTICE TO RESPONDENT: BASE MORTGAGE & INVESTMENTS LTD., BASE FINANCE LTD. ARNOLD BREITKREUTZ, SUSAN BREITKREUTZ, SUSAN WAY, AND GP ENERGY INC.

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

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

Date: **Thursday, December 10, 2015**
Time: **10:00 a.m.**
Where: **Calgary Court Centre, 601 – 5th Street S.W., Calgary, AB**
Before Whom: **Justice 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 lifting the stay of proceedings for Action Number 1501-12147 (the "Foreclosure Action"), granted in the Amended Amended Receivership Order, dated November 6, 2015, in the within Action.
2. Abridging time for service;
3. Costs of this application; and
4. Such further and other relief as may be necessary and this Court may grant.

Grounds for making this application:

5. The foreclosure action was commenced prior to the stay of proceedings, the mortgagor is not paying the mortgage payments, property taxes remain unpaid, the property is occupied with no use and occupation being paid, and there is no legal or equitable reason to maintain the stay in relation to this security.

Material or evidence to be relied on:

6. The Affidavits of Mike Terrigno, sworn October 7, 13, & 15, 2015;
7. The Affidavit of Robert Comptois, sworn October 13, 2015;
8. The Affidavit of Cecelia Chau, sworn December 4, 2015;
9. Pleadings in this action; and
10. Such further and other evidence as counsel may advise to this Court may permit.

Applicable rules:

11. *Alberta Rules of Court*.

Applicable Acts and regulations:

12. The Law of Property Act.
13. The Judicature Act.

Any irregularity complained of or objection relied on:

14. None.

How the application is proposed to be heard or considered:

15. To be heard in front of a Justice in Chambers.

WARNING

If you do not come to Court either in person or by your lawyer, the Court may give the applicant(s) 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 at the time shown at the beginning of the form. If you intend to rely on an affidavit or other evidence when the application is heard or considered, you must reply by giving reasonable notice of the material to the applicant.