



Clerk's stamp:

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COURT

COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE

CALGARY

PLAINTIFF

HARDIE & KELLY INC., IN ITS CAPACITY AS TRUSTEE  
IN BANKRUPTCY OF ASSISTIVE FINANCIAL CORP.

DEFENDANTS

RANDY SCHIFFNER, SLADE SCHIFFNER, BRANDON  
SCHIFFNER, ELAYNE SCHIFFNER, CAMERON  
SCHIFFNER AND BRANDI SCHIFFNER

DOCUMENT

STATEMENT OF DEFENCE OF BRANDI SCHIFFNER

ADDRESS FOR SERVICE AND  
CONTACT INFORMATION OF  
PARTY FILING THIS DOCUMENT

Attention: Douglas N. Tkachuk, Q.C.  
Reynolds, Mirth, Richards & Farmer LLP  
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File No: 104432-008-DNT

Note: State below only facts and not evidence (Rule 13.6)

**Statement of facts relied on:**

1. This Defendant denies each and every allegation contained in the Statement of Claim as it relates to this Defendant, and puts the Plaintiff to the strict proof thereof.
2. This Defendant denies that Assistive Financial Corp. was insolvent as is alleged in paragraph 45 of the Statement of Claim.
3. In complete answer to the Statement of Claim, this Defendant states and the fact is that this Defendant did not receive any benefit to the payments alleged to have been made in paragraph 46(e) of the Statement of Claim. This Defendant further states and the fact is that this Defendant was not even aware of any payments from Assistive Financial Corp. This Defendant further states and the fact is that any payments received were thought to have been from Randy Schiffner and Elayne Schiffner, the parents of this Defendant's then husband, Cameron Schiffner.
4. In further answer to the Statement of Claim, this Defendant states and the fact is that any payments alleged to have been made to this Defendant were in fact to or for the benefit of the Defendant, Cameron Schiffner, and not to or for the benefit of this Defendant.

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**Any matters that defeat the claim of the plaintiff(s):**

5. The payments alleged in paragraph 46(e) of the Statement of Claim were in fact salary payments to the Defendant, Cameron Schiffner, and not salary payments to this Defendant.
6. If any payments were received by this Defendant, which is not admitted but expressly denied, this Defendant states that there was never any intention to defraud, defeat or delay creditors of Assistive Financial Corp. which is alleged in the Statement of Claim.

**Remedy sought:**

7. This Defendant requests that the Plaintiff's claim be dismissed against this Defendant with costs to be paid by the Plaintiff.

1263032; June 27, 2014