

ACTION NUMBERS:
4801-08433 84311
9401-17475

IN THE COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL DISTRICT OF CALGARY

BETWEEN

EDWARD JORDAN
APPLICANT

AND

MARCELLA JORDAN
RESPONDENT

NOTICE OF MOTION

TAKE NOTICE THAT the Respondent (Petitioner), Marcella Jordan, hereby applies to the Presiding Judge in Chambers, Justice Parks, at the Court House, 611-4th Street S.W., Calgary, Alberta, on Wednesday, April 18th, 2007, at 10:00 a.m. in the morning or soon after that can be heard for the following relief, based on material facts filed previously and verifiable documents not being made available to her Ind. Forensic Auditor, Anthony Gavrielides, for review and authentication.

AND FURTHER TAKE NOTICE that the Respondent (Petitioner), Marcella Jordan applies on the following grounds:

1. THAT verifiable bank records of Edward Jordan to show payments to any Court and/or to Ms Jordan directly have not been forthcoming. (*Exhibit A*)
2. THAT the RRSP documents from BMO Nesbitt Burns to verify legally correct transfer and dispersal of:
Account Number 711-01965-11 – Registered Retirement Savings Plan (Regular). Full account transferred out to Scotia McLeod's account 497-14166-17, January 13, 1998; and

Account Number 711-00422-10 – Registered Retirement Savings Plan (Locked In). Full account transferred out to Scotia McLeod's account number 495-85554-11, January 22, 1998;

have not been provided by BMO Nesbitt Burns, Edward Jordan and/or his a lawyer, Wayne Barkauskas.

3. THAT documents to support appropriate involvement of various lawyers in their roles related to the interests of Ms Jordan in this matrimonial settlement have not been provided from any source. This includes Mr. Frank Quennell, Mr. Anthony Merchant, Mr. Matthew Merchant, Ms. Lisa Mebs and Diedre Smith. This especially is related to any financial transactions approved and/or facilitated through their interventions. Verifiable instruments of the legal profession have not been provided to show any legitimacy to the activities of these persons so named, or related persons.

4. THAT Ms. Melissa McKinley and Ms. Lara Lalonde, Alberta Justice have not provided appropriate support Court filed material, service records, etc. for the movement of this matrimonial file to/from Saskatchewan, Ontario or Alberta. This includes the lack of any documentation to support an Injunction the Respondent (Petitioner), Marcella Jordan was not aware of until recent events unfolded.

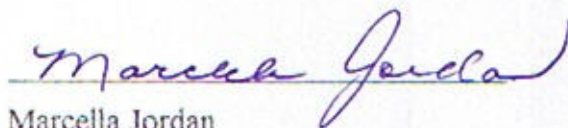
5. THAT the Respondent, (Petitioner), Marcella Jordan, relies on the Affidavit of Anthony Gavrielides, and her previously filed statements of facts to support this application.

6. THAT Ms. Jordan requests an Order to produce verifiable support documentation to facilitate a financial review of all claims made by the Applicant, Edward Jordan, wherein he implies she has received her division of matrimonial property and support payments in accordance to agreements, matrimonial statutes and appropriate legal advice from above mentioned lawyers. The lack of verifiable Court files or other documentation suggests Mr. Jordan's position is tenable at best and fraudulent at the worst.

7. THAT further, until such historical verification of bank/Court records occurs, the Applicant, Edward Jordan be ordered to make spousal support direct to Ms. Jordan and his application for termination of spousal support be dismissed, with costs to the Respondent, Marcella Jordan.

8. THAT in the event of fraudulent activities becoming evident in any of the prior transactions the Court will recommend, at its discretion, appropriate remedies to compensate Ms. Jordan for her loss of real property and future benefits, financial hardships and emotional distress.

DATED AT Calgary, in the Province of Alberta, this 13 day of April, 2007.



Marcella Jordan

Respondent (Petitioner)

TO: Family Law Division
Court of Queen's Bench for Alberta
Judicial Centre of Calgary

AND TO:
Wayne Barkauskas
Lawyer for: Edward Jordan