

CANADA  
PROVINCE OF SASKATCHEWAN

IN THE COURT OF APPEAL FOR SASKATCHEWAN  
ON APPEAL FROM THE COURT OF QUEEN'S BENCH  
(FAMILY LAW DIVISION)  
JUDICIAL CENTRE OF REGINA

BETWEEN:

████████████████████ and ████████████████████

APPELLANTS  
(THIRD PARTY RESPONDENTS)

AND:

████████████████████

RESPONDENT  
(PETITIONER)

AND:

████████████████████

RESPONDENT  
(RESPONDENT)

**NOTICE OF MOTION  
TO  
LIFT STAY OF EXECUTION**

TAKE NOTICE that an application will be made to the presiding judge in Chambers at the Court House, 2425 Victoria Avenue, Regina, on Wednesday, November 8, 2006, at 10:00 o'clock in the forenoon or so soon thereafter as counsel may be heard on behalf of the Applicant (Respondent), ████████████████████, for the following relief:

- (a) An Order pursuant to Rule 15(1) of the *Court of Appeal Rules* for Saskatchewan, lifting the stay of execution of the fiat of Madam Justice J. A. Ryan-Froslic dated the 25<sup>th</sup> day of October, 2006, pending the determination of the appeal;

- (b) An Order pursuant to Rule 52 of *The Court of Appeal Rules* for Saskatchewan, that the Applicant (Respondent) be awarded the costs of this application.

AND FURTHER TAKE NOTICE that the following material will be filed in support of this application:

1. This Notice of Motion with proof of service;
2. Case law in support of the Applicant's (Respondent's) position;
3. Affidavit of [REDACTED], Applicant (Respondent); and
4. Draft Order.

DATED at Saskatoon, Saskatchewan, this 31<sup>st</sup> day of October, 2006.

ROE & COMPANY

Per: \_\_\_\_\_

Solicitors for the Applicant (Respondent),  
[REDACTED]

TO: Amot Heffernan Blenner-Hassett  
Barristers, Solicitors & Mediators  
1250 1<sup>st</sup> Avenue East  
Prince Albert, SK S6V 2A8

Attention: Dale N. Blenner-Hassett  
(Counsel for [REDACTED] & [REDACTED])

AND TO: Curtis Law Office  
Barrister & Solicitor  
2505 William Avenue  
Saskatoon, SK S7J 2B1

Attention: Gregory J. Curtis (Counsel for [REDACTED])

[REDACTED]

This document was prepared by:

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