

Ferguson v. Tejpar et al

David Schulli
on Friday, April 30, 2021



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COURT FILE NUMBER 2101-00793

COURT COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

APPLICANT THOMAS H. FERGUSON

RESPONDENTS ALI TEJPAN, ZAHRA TEJPAN, REGISTRAR
OF TITLES for the LAND TITLES
OFFICE, JOHN DOE, JANE DOE, ABC
CORPORATION



502141

Transcript of Oral Questioning of

DAVID SCHULLI

(On Affidavit sworn April 22, 2021)

Held via videoconferencing

April 30, 2021

1 ALL PARTIES APPEARING VIA VIDEOCONFERENCING

2

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22 403-266-1744

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1 (Proceedings commenced at 1:02 p.m.)

2 COURT REPORTER: Counsel, as you all know

3 because we are using a virtual connection, everyone is
4 going to have to be more conscious than ever of not
5 speaking over each other. If I cannot hear the end of
6 a question or the beginning of an answer, you are going
7 to have a very poor record. If I have to consistently
8 interrupt because I cannot hear or understand something
9 that is said, you will not have a good examination
10 flow. If there is an objection, I must be able to hear
11 it and know who is objecting. If I do have to
12 interrupt, please be patient and understand that my
13 goal is to provide you with a perfect record of these
14 proceedings. Please move your papers and/or legal pads
15 away from your computer so there is no ambient noise.

16 From time to time we've noticed the audio can be
17 affected, and if so, we may need to stop the
18 proceedings and wait for a moment for the audio to
19 improve, either by reconnecting or asking that everyone
20 use the conference call number if you're using computer
21 audio.

22 Would the witness please identify himself and
23 spell your first and last name for the record?

24 THE WITNESS: David Schulli, D-A-V-I-D,
25 S-C-H-U-L-L-I.

1 COURT REPORTER: If there are any questions about
2 the witness's identity, would you counsel please advise
3 on the record now?

4 Hearing no objection, counsel, are you ready for
5 me to affirm the witness?

6 MS. MANSFIELD: Yes.

7 DAVID SCHULLI, affirmed, questioned via videoconference
8 by Ms. Mansfield:

9 Q. MS. MANSFIELD: Good afternoon, Mr. Schulli. My
10 name is Sophie Mansfield. I am counsel for the
11 respondents Zahra and Ali Tejpar. And are you aware of
12 an originating application commenced by Mr. Thomas
13 Ferguson in Court of Queen's Bench of Alberta, Action
14 Number 2101-00793?

15 A. You're asking if I was aware of, did you say?

16 Q. Yes. Are you aware of that application?

17 A. Yes. Yes.

18 MR. MARBLE: Just for clarity, the document
19 that I've given to Mr. Schulli and that he has in front
20 of him is the May 3rd application.

21 MS. MANSFIELD: Thank you.

22 Q. MS. MANSFIELD: And, Mr. Schulli, you're aware
23 that this application is for injunctive relief?

24 A. Yes.

25 Q. So if I refer to that application as "the injunction

1 application," you will know what I am referring to?

2 **A.** Yes.

3 **Q.** And do you understand that my client, Zahra Tejpar,
4 affirmed an Affidavit in relation to the injunction
5 application on April 13th, 2021?

6 **A.** Yes.

7 **Q.** And I'm going to refer to that as "the Tejpar
8 Affidavit"?

9 **A.** Okay.

10 **Q.** And you swore an Affidavit in the injunction
11 application on April 22nd, 2021, correct?

12 **A.** Yeah.

13 **Q.** And I am going to refer to that as "your Affidavit"?

14 **A.** Okay.

15 **Q.** And were you represented by counsel at the time you
16 swore your Affidavit?

17 **A.** Was I represented by counsel? Well, I...

18 **MR. MARBLE:** Counsel, Mr. Schulli isn't a
19 party, so he swore that Affidavit with my partner
20 Ms. Embury.

21 **Q.** **MS. MANSFIELD:** You swore that as a witness, not a
22 party?

23 **A.** I swore -- my Affidavit is as a witness.

24 **Q.** And, Mr. Schulli, you've taken an oath to tell the
25 truth today?

1 **A.** Yes.

2 **Q.** And I gather you will tell the truth?

3 **A.** Yes.

4 **Q.** And you have a copy of your Affidavit and the exhibits
5 in front of you?

6 **A.** Yes.

7 **Q.** And at the time you swore your Affidavit, it was true
8 to the best of your knowledge?

9 **A.** Yes.

10 **Q.** And your Affidavit is still true to the best of your
11 knowledge?

12 **A.** Yes.

13 **Q.** Do you have any corrections to make to your Affidavit?

14 **A.** No.

15 **Q.** And two of the respondents in the injunction
16 application are Zahra and Ali Tejpar, correct?

17 **A.** Yes.

18 **Q.** And I will at times refer to those two individuals as
19 "the Tejpars," and you'll know who I am referring to?

20 **A.** Yes.

21 **Q.** And you understand that the Tejpars are the registered
22 owners of the property legally described as
23 Plan 3605FO, Block 91, Lot 1, correct?

24 **A.** Yes.

25 **Q.** And that property is also municipally described as

1 1023 - 32nd Avenue Southwest, correct?

2 **A.** Yes.

3 **Q.** And in your Affidavit, you identify these lands as "the
4 subject property"?

5 **A.** Yes.

6 **Q.** And I'm going to refer to them as "the subject
7 property" or "the Tejpar property," and you will know
8 what I am referring to?

9 **A.** Yes.

10 **Q.** And you were the prior registered owner of the subject
11 property, correct?

12 **A.** The property was my father's house, and he passed away,
13 and I became the executor of the estate so I had to do
14 transmission of the property to my name to legally deal
15 with it.

16 **Q.** And so you were the registered owner?

17 **A.** Yes. I was on the title.

18 **Q.** And what did you do to prepare for today's
19 cross-examination?

20 **A.** Well, we -- I met with Mr. Marble, and we went over the
21 various documents. Just went over them, and that's
22 about it. You know, he kind of briefed me on kind of
23 what's going to happen in the process and that I'll be
24 questioned and stuff, but that was it.

25 **Q.** Did you speak with Mr. Ferguson in advance of today's

1 cross-examination?

2 **A.** I have not spoken to Mr. Ferguson.

3 **Q.** And have you spoken with Mr. Engbloom in advance of
4 today's cross-examination?

5 **A.** I have spoken with Mr. Engbloom a couple of times, but
6 it was -- it was to indicate to him that I would be
7 willing to give him this -- this witness statement.

8 **Q.** And when was that?

9 **A.** When I spoke with him?

10 **Q.** Yes.

11 **A.** The exact -- I don't -- I mean, I could go back in my
12 emails and see. We exchanged an email and exchanged
13 phone calls sometime leading up to April 22nd. I don't
14 know the dates offhand.

15 MS. MANSFIELD: I would like to ask for an
16 undertaking for you to review your records and provide
17 copies of the emails between yourself and Mr. Engbloom
18 relating to this application and your
19 cross-examination?

20 MR. MARBLE: We'll take it under advisement.

21 UNDERTAKING NO. 1 - For David Schulli
22 to review his records and to provide
23 copies of the emails between himself
24 and Mr. Engbloom relating to this
25 application and his cross-examination -

1 TAKEN UNDER ADVISEMENT

2 **Q.** MS. MANSFIELD: What did you and Mr. Engbloom
3 discuss?

4 **A.** I discussed just what happened during the sale process
5 of the property, listing it and selling it.

6 **Q.** Did you speak with Gordon Ross in advance of today's
7 cross-examination?

8 **A.** I have not spoken -- I did not speak with him. I
9 contacted his assistant by email, asking -- or
10 requesting a copy -- if she had an email chain of some
11 events that happened right prior to closing, but I did
12 not speak with Gordon Ross himself. I dealt with --
13 with -- with his assistant.

14 **Q.** And when did you contact his assistant?

15 **A.** I can't find the sent one. It -- it looks like it was
16 April... Well, I contacted her by phone and asked her
17 the question, and she responded to me in an email. So
18 I -- I believe she responded to me the same day I
19 phoned her, and that -- and her response was on
20 Wednesday, April 7th, was her response to me because I
21 just phoned her and asked her the question.

22 **Q.** Was that after you had spoken with Mr. Engbloom?

23 **A.** Yes. Yeah.

24 **Q.** And you said she provided you with a copy of an email?

25 **A.** Yes. It's in my -- it's Exhibit B in my package, in my

1 Affidavit, Exhibit B. And it's a -- it's an email
2 chain between my realtor, Gordon Ross, and the Tejpar
3 realtor, Kamil Lalji, so after some event that
4 transpired on the 7th of January, 2020.

5 **Q.** Did she provide you with any other emails?

6 **A.** No, that's all she provided me with.

7 **Q.** Did you ask her for any other emails?

8 **A.** No. That's the only contact. I actually -- today, I
9 emailed her to ask her for the -- the listing document,
10 the listing information from when we listed the
11 property. But those are the only two -- those are the
12 only two communications I've had with the realtor since
13 I sold the house. One was requesting if they had an --
14 some sort of backup email about the events of
15 January 7th, 2020, and then just today asking. And she
16 responded -- like I say, I verbally -- I phoned her for
17 the first request, and today I emailed her the request,
18 and she emailed back promptly, and that's about it.
19 That's the only two communications I've had. Actually,
20 in my email -- you know, Engbloom, I specifically asked
21 him in my email not -- not to talk to Gordon Ross.

22 **Q.** So you asked Mr. Engbloom if he spoke with Mr. Ross?

23 **A.** Mr. Engbloom, in one of his emails with me asked if it
24 would be all right -- because I had discussed the
25 nature of the deal and the timing of -- of the Tejpars'

1 request to have the Caveat removed, asking me to remove
2 the Caveat from the title, and so he was aware of that.
3 He emailed me back asking for -- for more clarification
4 or would I be willing to make a statement regarding the
5 events, and in that email or one of the emails, he
6 asked if it would be all right if he contacted Gordon
7 Ross. And my response to him at that time was I would
8 be reluctant -- I can provide -- I'll find the email.
9 I'd rather just look at the email and see what it said.

10 **Q.** You don't need to find the email now, sir. We've
11 requested copies by undertaking, so we can review them
12 when you provide them.

13 **A.** Anyhow, my response to him was, I was -- I -- I said --
14 he was asking for background. I said I -- context, he
15 wanted context. And I said I would be able -- I feel
16 that I would be able to provide you with all the
17 context you need. I'm reluctant to involve Gordon Ross
18 at this time. I just -- I just figured -- you know, I
19 sold the house, I know what happened. What's -- you
20 know, why do I need to inconvenience my realtor a year
21 after the fact?

22 **MR. MARBLE:** Well, counsel has asked for an
23 undertaking, and if it's relevant, then we can provide
24 the document.

25 **Q.** **MS. MANSFIELD:** Did you speak with anyone else in

1 advance of today's cross-examination?

2 **A.** No, not that I can think of.

3 **Q.** And prior to today's cross-examination, did you review
4 the Affidavit sworn by Zahra Tejpar in this matter?

5 **A.** Yes, I did.

6 **Q.** Did you review all the exhibits?

7 **A.** I didn't read them all. I scrolled through them. I
8 saw what most of them were. Many were repetitive,
9 titles of different people and stuff, and the Caveat
10 that's now been found. But I've read through her --
11 her -- her Affidavit and then browsed the attachments
12 to see what they were and understand what they are.

13 **Q.** Did you review the Affidavit sworn by Thomas Ferguson?

14 **A.** I read it. Yes, I read it.

15 **Q.** And did you review the exhibits to that Affidavit?

16 **A.** Yes.

17 **Q.** And did you review the Affidavit sworn by Robert
18 Engbloom?

19 **A.** Yes.

20 **Q.** And did you review all of the exhibits associated with
21 that Affidavit?

22 **A.** Yes.

23 **Q.** And did you review the Affidavit sworn by Jane Virtue
24 in this matter?

25 **A.** Yes.

1 Q. And, sir, you do not currently reside in Elbow Park,
2 correct?

3 A. I do not.

4 Q. Do you own any property in Elbow Park?

5 A. No, I do not.

6 Q. I understand you previously lived in Elbow Park?

7 A. Well, I -- I lived there in my family home growing up.

8 Q. So when did you previously reside in Elbow Park?

9 A. I resided in Elbow Park from 1966 to -- you know, and
10 then in the early '80s when I went off to university,
11 growing up, and then at various points between, you
12 know, coming back and forth. But, you know, the last
13 time I lived in that house permanently would have been
14 -- well, I lived there in 19-- I had moved to
15 Vancouver. I came back from Vancouver and I lived
16 there shortly. I went back to Vancouver in the late
17 '90s, and then the house I live in now I moved to in
18 2000. So I did live for a time there in the late '90s.

19 But the family house was there -- I mean, we had
20 two houses on that street. We had a house at 3404
21 across the street from 1966 to '77, and we purchased
22 that house in '77. So we're 54 years on that street,
23 my family.

24 Q. Are you aware of the group of residents in Elbow Park
25 who were involved with the injunction application?

1 **A.** Yes.

2 **Q.** And this group includes Thomas Ferguson, Hugoline
3 Morton, Robert Engbloom, Risa Desa, Wayne Gambell, and
4 Hector McFadyen?

5 **A.** No, I don't recognize some of those names.

6 MR. MARBLE: The application --

7 **A.** I don't know some of those names.

8 MR. MARBLE: The application was brought by
9 Mr. Ferguson. That's who my client is. So I don't --
10 I'm struggling with the relevance here as to
11 Mr. Schulli's familiarity with other people who may or
12 may not have an interest in this. Mr. Schulli's
13 Affidavit is about the sale.

14 MS. MANSFIELD: Yes, but he's said he's reviewed
15 everything in the injunction application and the group
16 of residents as testified to by Mr. Ferguson and
17 Mr. Engbloom.

18 MR. MARBLE: Sorry, you broke up, counsel.

19 MS. MANSFIELD: Sorry. I said he swore his
20 Affidavit in relation to the injunction application,
21 and both Mr. Ferguson and Mr. Engbloom have testified
22 to the existence of the group of residents in Elbow
23 Park involved in the application.

24 MR. MARBLE: Yeah, but I'm just struggling --

25 **A.** I swore my -- sorry to interrupt. I swore my Affidavit

1 prior to reading any of those other -- any of their --
2 anything. I made a statement about the sale of the
3 property. And after I made that statement, I was
4 provided with -- with the other documents for this
5 case. Prior to my signing of the Affidavit, I had seen
6 none of those documents. I was simply -- I agreed to
7 help out saying my role in selling the house, signed
8 this statement, and that was it. At the time I signed
9 the statement, that's all I knew. I had not seen any
10 other -- I was requested to just give information on
11 what happened during the events of me listing the
12 property up to possession date.

13 **Q.** MS. MANSFIELD: And so I had asked if you had
14 spoken with Mr. Ferguson and Mr. Engbloom prior to
15 today's cross-examination. Did you speak with any of
16 the other residents of the Elbow Park group prior to
17 today?

18 **A.** I don't -- I don't -- those names on that whole thing,
19 I don't recognize. I know Mr. Ferguson. I have not
20 spoken with Mr. Ferguson. I spoke with Mr. Engbloom a
21 couple of times. And those are the only two people
22 I've spoken to to do with this case.

23 **Q.** And are you aware of the fundraising efforts related to
24 the injunction application?

25 **A.** I am aware of that.

1 Q. And what's your awareness about the fundraising
2 efforts?

3 A. In one of my conversations with Mr. Engbloom, he
4 mentioned that they were raising funds for -- you know,
5 to assist with the legal defence.

6 Q. And are you involved in any of those fundraising
7 efforts?

8 MR. MARBLE: Counsel, no. That's not what
9 we're here about. Mr. Schulli has given you his
10 Affidavit. How -- how I get paid or anything else is
11 privileged. So, like, if you want to ask --

12 MS. MANSFIELD: So I'm not asking --

13 MR. MARBLE: Go ahead.

14 MS. MANSFIELD: I'm not asking if he's paid you.

15 I'm asking if he was involved in any of the fundraising
16 efforts.

17 A. I don't know, was --

18 (SIMULTANEOUS CROSS-TALK)

19 COURT REPORTER: We need to speak one at a time,
20 please. I didn't hear what you said, Mr. Marble.

21 MR. MARBLE: I'm objecting to that question on
22 the basis of relevance.

23 OBJECTION TAKEN to answering the question: And are you
24 involved in any of those fundraising efforts?

25 Q. MS. MANSFIELD: Mr. Schulli, have you made any

1 donations towards the injunction application?

2 MR. MARBLE: Objection. Relevance.

3 OBJECTION TAKEN to answering the question: Mr. Schulli,
4 have you made any donations towards the injunction
5 application?

6 Q. MS. MANSFIELD: Mr. Schulli, at paragraph 1 of
7 your Affidavit, you state that you were the seller of
8 the subject property, correct?

9 A. Yes.

10 Q. And you inherited the subject property from your
11 father, G. Richard Schulli; is that correct?

12 A. No. I -- I am the executor of the estate. And for me
13 to deal as the executor, I have to have this property
14 transferred into my name to deal with it. I sold --
15 I'm selling the house on behalf of the estate. So I'm
16 not the inheritor of the property. I'm the executor
17 dealing with what I'm instructed to do in the will,
18 which is dispose of the property.

19 Q. And so the subject property was transferred to you by
20 way of transmission of land of November 22nd, 2019?

21 A. Yes.

22 Q. And when the subject property was transferred to you,
23 were you aware of any instruments registered on title?

24 A. Yes. It's right on the title. There's a Caveat.

25 Q. And so when you say "Caveat," you're referring to the

1 instrument that was registered as 7 -- Instrument
2 Number 7648FT?

3 **A.** Yes.

4 **Q.** So I'm going to refer to that as "the Instrument," and
5 you'll know what I am referring to?

6 **A.** Yes.

7 **Q.** Did you know what the Instrument was at the time the
8 property was transferred to you?

9 **A.** Well, it's a caveat. Do I know what it was? It's a
10 caveat.

11 **Q.** Did you have any further information?

12 **A.** I know that prior to selling the house, back in about
13 2018 my father had contacted Gordon Ross and asked him
14 just as a consultation about selling the house and
15 options available to him about selling the house, and
16 Gordon had responded to him in a letter. It's a letter
17 I found during -- during the estate. And it just
18 talked about that he had searched the title and gone to
19 Land Titles and found that the Caveat was not
20 registered. So I knew from that document -- or sorry
21 -- the Caveat was misplaced. There was a response from
22 the Land Titles, and it had that -- that the document
23 was not on record or it had been misplaced, and there
24 was no -- so that's -- that's all I know of the Caveat.

25 **Q.** So do you still have a copy of that letter?

1 **A.** I have no idea. I -- I -- I'm dealing with an estate.
2 I'm a year and a half into it. I've been tossing and
3 purging things all over the place. So at this moment,
4 I have boxes everywhere, in three different garages,
5 and I have no idea.

6 MS. MANSFIELD: I would like to ask for an
7 undertaking for you to review your records for a copy
8 -- and produce a copy of the letter that Gordon Ross
9 sent to your father in 2019 regarding a potential sale
10 of the property? 2019, sorry, I might have misspoken.
11 Or did you say 2018? Sorry.

12 **A.** I believe it was 2018.

13 MS. MANSFIELD: 2018.

14 MR. MARBLE: On a best-efforts basis we'll look
15 for it.

16 UNDERTAKING NO. 2 - For David Schulli
17 to review his records and to produce a
18 copy of the letter that Gordon Ross
19 sent to his father in 2018 regarding a
20 potential sale of the property - Best
21 Efforts

22 **Q.** MS. MANSFIELD: And just to confirm, at the time
23 the property was transferred to you in 2019, you
24 understood that the Instrument was lost, correct?

25 **A.** Yes.

1 Q. And have you ever seen a copy of the document
2 underlying the Instrument at the time the subject
3 property was transferred to you?

4 A. Sorry, are you saying -- can you repeat the question,
5 please?

6 Q. So in November 2019 when the subject property was
7 transferred to you, at any time prior to that, had you
8 seen a copy of the document underlying the Instrument?

9 A. No.

10 Q. When the subject property was transferred to you in
11 2019, did you do any investigations to determine what
12 the Instrument was?

13 A. No.

14 Q. At the time the subject property was transferred to
15 you, did you ask any of the neighbours to the subject
16 property what the Instrument was?

17 A. No.

18 Q. At the time the subject property was transferred to
19 you, did you ask the Elbow Park Residents Association
20 what the Instrument was?

21 A. No.

22 Q. And, sir, at the time the property was transferred to
23 you, other than you knowing that it was a said Caveat,
24 did you have any other information about what the
25 Instrument was?

1 **A.** No information.

2 **Q.** At paragraph 2 of your Affidavit, you state that you
3 signed a listing agreement for the sale of the subject
4 property?

5 **A.** Yes.

6 **Q.** And that listing agreement was with Gordon Ross, who is
7 a realtor at Re/Max Real Estate Central?

8 **A.** Yes.

9 **Q.** How did you decide to use Mr. Ross as a realtor?

10 MR. MARBLE: Counsel --

11 **A.** Well, as I said --

12 MR. MARBLE: -- like why he chose to use Gordon
13 Ross? I'm sorry, like, this Affidavit is pretty
14 simple. I don't understand why we're investigating the
15 choice of realtors here.

16 MS. MANSFIELD: Well, he's listed that he chose
17 Mr. Ross as a realtor, and so I'm just trying to get
18 some information about why that was the case.

19 MR. MARBLE: Okay, I understand --

20 **A.** It wasn't that --

21 MR. MARBLE: -- and fine, but I'd really
22 appreciate it if we could stay related to what we're
23 actually investigating here today. Like, the realtor
24 -- who the realtor is and why, I just really struggle
25 to see the relevance.

1 MS. MANSFIELD: Is that an objection?

2 MR. MARBLE: No, go ahead, but you can -- you
3 can count on me turning it into an objection if there's
4 not some relevance here.

5 A. I can answer the question. You know, I'll answer the
6 question.

7 MR. MARBLE: Answer, Mr. Schulli.

8 A. You know, my father had contacted him previously, so
9 there was a relationship there of some sort. And I --
10 you know, I drive around the neighbourhood for years
11 and see the signs everywhere, and I figured he must be
12 a good realtor. That's about it.

13 Q. MS. MANSFIELD: So before you signed the listing
14 agreement with Mr. Ross, had you already found the
15 letter Mr. Ross had sent to your father?

16 A. I -- as I said, through the dealings from my father's
17 estate from having died and going through things in his
18 office, there was a file, and I saw the -- I saw that
19 he had previously contacted him. That's partly why I
20 contacted Gordon Ross is my father had already
21 previously just inquired. And Gordon Ross -- at that
22 time in 2018, they were just talking about options.
23 You know, my parents were getting old. They were in
24 their -- in their -- in their late 80s, and they were
25 just trying to figure out what -- what were the options

1 available to them to do with their house, and that was
2 it. And, you know, they had contacted him and dealt
3 with him, and that's as good as anyone for me, plus
4 from what I can see he's a well-known realtor in the
5 area and does well. So I'm not going to -- that's --
6 that's the reason.

7 **Q.** What did do you before you signed the listing
8 agreement?

9 **A.** What did I do?

10 MR. MARBLE: What does that even mean, counsel?

11 **A.** I don't even understand the question.

12 **Q.** MS. MANSFIELD: Did you review the title to the
13 subject property before you signed the listing
14 agreement?

15 **A.** Well, I've already stated that I reviewed the title. I
16 reviewed the title when I put it -- when I did the
17 transmission.

18 **Q.** Right. So I understand the property was transmitted to
19 you in November of 2019, and you state in your
20 Affidavit you signed the listing agreement in about --
21 on about December 11th, 2019?

22 **A.** Yes.

23 **Q.** So in between that time, did you review the title again
24 before signing the listing agreement?

25 **A.** I did nothing. I did nothing. I did the transmission.

1 And then I was moving through doing my estate duties,
2 and the next thing on the list was to sell the house,
3 so I called a realtor.

4 **Q.** And so when you contacted Mr. Ross to sell the subject
5 property, what did you tell Mr. Ross about the subject
6 property?

7 **A.** What did I tell him? Well, he came to my -- we met at
8 the subject property, and we sat at the table, and we
9 discussed what you would normally discuss when you're
10 going to list a house, and we signed an agreement.

11 **Q.** And so what was it that you would normally discuss?
12 What did you actually discuss?

13 **MR. MARBLE:** Objection, counsel. This line of
14 questioning is irrelevant. Unless you can tell me why
15 it's relevant to this Affidavit, no.

16 **OBJECTION TAKEN** to answering the question: And so what was
17 it that you would normally discuss? What did you
18 actually discuss?

19 **Q.** **MS. MANSFIELD:** Did you --

20 **A.** We had a conver- -- we had a conversation about the
21 price, which is what people do when they sell a house.

22 **Q.** Thank you. Did you discuss the Instrument with
23 Mr. Ross at the time you signed the listing agreement?

24 **A.** No. Well, only in a sense that -- yes, and that was
25 irrelevant and didn't matter, and these -- these types

1 of things appear on titles all over Mount Royal, and it
2 -- it made no matter. It was not a consideration.

3 **Q.** And are you aware if Mr. Ross reviewed the title to the
4 subject property at the time you signed the listing
5 agreement?

6 **A.** I'm sorry, you broke up on that one part. You'll have
7 to repeat the question.

8 **Q.** Sorry. I said are you aware if Mr. Ross reviewed the
9 title to the subject property at the time you signed
10 the listing agreement?

11 **A.** Well, I -- I can't answer for him. I presume he did.
12 I mean, he's a realtor. It's probably his job.

13 **Q.** And other than the discussion you had with Mr. Ross
14 about the Instrument at the time you signed the listing
15 agreement, did Mr. Ross ask you about the Instrument
16 again?

17 **A.** No.

18 **Q.** And at paragraph 3 of your Affidavit, you state that
19 the subject property was listed on the MLS on or about
20 December 17th, 2019?

21 **A.** Yes.

22 MR. MARBLE: Did you say paragraph 3?

23 MS. MANSFIELD: Yes, I said paragraph 3, I
24 believe.

25 MR. MARBLE: Okay, I'm there. Sorry.

1 Q. MS. MANSFIELD: Did you and Mr. Ross discuss the
2 Instrument after the subject property was listed on the
3 MLS?

4 A. The only time after the property was listed with the
5 Caveat -- with the Instrument we're talking was
6 mentioned was on Tuesday, January 7th, 2020, when he
7 phoned me and asked -- to inform me that the clients or
8 the purchasers were requesting a \$157,500 reduction in
9 the price of the house and for me to have the Caveat
10 removed. That was the only other time it was
11 mentioned. I actually never -- after the listing
12 agreement, I had barely spoken to Gordon Ross. I may
13 have spoken to him once. There wasn't a big back and
14 forth.

15 Q. So at paragraph 5 of your Affidavit, you state that
16 after the subject property was listed, Mr. Ross
17 contacted you and advised the Tejpars were interested
18 in the subject property, correct?

19 A. The day after the -- on December 18th, he called me and
20 said there were people who were interested but they had
21 not made an offer, and they were requesting if I do a
22 subdivision on the lot -- if I would be interested in
23 getting the lot subdivided, to which I responded no.
24 Sorry, is that what we're talking? Anyhow, he -- he
25 contacted me the morning of the 18th, right, and saying

1 there were people interested and asking if I would do a
2 subdivision on the lot. I responded no. Later that
3 day, there -- there was a purchase contract. Gordon
4 phoned me and said he had received a purchase offer
5 from -- from the Tejpars.

6 **Q.** Sorry, how did Mr. Ross contact you when he said that a
7 party was interested in you subdividing the property?

8 **A.** Phone call.

9 **Q.** Do you have any notes of that phone call?

10 **A.** No. It was a quick phone call. He said there was
11 interest in the property. They want you to do
12 subdivision. No. That was about the length of the
13 phone call.

14 **Q.** And did he give the name of the purchaser who was
15 interested in the subdivision?

16 **A.** No, he didn't.

17 **Q.** And at the time the Tejpars were interested in making
18 an offer on the subject property, there were several
19 other parties interested and inquiring about the
20 subject property, correct?

21 **A.** There was other interest in the property.

22 **Q.** Did any of these other parties ask you about the
23 Instrument?

24 **A.** Not me. I -- I had no other knowledge of anyone else
25 asking about the Instrument.

1 Q. Are you aware if any of those other parties asked
2 Mr. Ross about the Instrument?

3 A. Not aware.

4 Q. You understood that the subject property was desirable
5 and would likely sell quickly, correct?

6 A. I suspected, yes.

7 Q. And at paragraph 5 of your Affidavit, you state that
8 you received an offer to purchase from the Tejpars?

9 A. Yes.

10 Q. And then if you turn to paragraphs 10 to 12 of your
11 Affidavit, you state --

12 A. Yes.

13 Q. -- you state that the Tejpars through their realtor
14 asked if you would remove the Instrument, correct?

15 MR. MARBLE: You're looking at 10 to where,
16 counsel?

17 MS. MANSFIELD: Paragraph 10 to paragraph 12.

18 A. Yes, okay. On January 7th, 2020, I received a phone
19 call in the morning from Gordon Ross, so again this is
20 the day before the conditions were supposed to be
21 lifted, so kind of the last minute, and the
22 communication to me from Mr. Ross was that the
23 purchasers wanted -- requested a significant price drop
24 because they said their -- their appraiser said it was
25 worth less. And they asked if I would have the Caveat

1 removed -- the Instrument removed, which I replied no.

2 And then hence my Exhibit B coming in where
3 there's a conversation and -- and -- the email
4 conversation through their realtor, and it states that
5 I'm not interested in doing that. I'm not interested
6 in the price drop. I'm not interested in -- that I'm
7 not interested in -- in removing the Caveat. And the
8 subject at Exhibit B of mine is the email chain after
9 that phone conversation to -- to the purchasers'
10 realtor. I mean, we can see that chain, Tuesday,
11 January 7th, 10:31 a.m. (as read)

12 The seller is not willing to accept one
13 million, two-fifty, or nor is he
14 interested in removing the Caveat. Your
15 client (INDISCERNIBLE) --

16 COURT REPORTER: Can you slow down, sir? Slow
17 down, please.

18 **A.** Sorry. This is the email after my phone conversation
19 with Gordon Ross, January 7th, 2020, at 10:31.
20 (as read)

21 The seller is not willing to accept
22 1,250,000, nor interested in removing
23 the Caveat. Your clients need to remove
24 their conditions or move on, as we have
25 other interests. Please advise as soon

1 as possible.

2 MR. MARBLE: So just for clarity on the record,
3 counsel, I think what Mr. Schulli is referring to is
4 the email at Exhibit B.

5 MS. MANSFIELD: Yes.

6 A. Yes. And then that was at 10:31. And then 10:42, 11
7 minutes later, the purchasers' realtor responds:
8 (as read)

9 Do you think there is any flexibility on
10 price or removing the Caveat whatsoever?

11 So once we have, you know, pretty well said no, they're
12 pressing again with the same question. And then later
13 that day at 4:01 p.m., my realtor responds: (as read)

14 He is not interested in changing the
15 price or removing the Caveat. Please
16 let me know how your clients would like
17 to proceed.

18 Q. MS. MANSFIELD: And I just want to sort of go
19 through that piece by piece. So when they asked you to
20 remove the Instrument, that was after the offer was
21 accepted by prior to the conditions being waived,
22 correct?

23 A. Yes.

24 Q. And like you said, they also asked you to lower the
25 price, correct?

1 **A.** Yes.

2 **Q.** And that was, again, after the offer was accepted but
3 prior to the conditions being waived?

4 **A.** Yes. The offer was accepted on December 18th. The
5 next request came just under three weeks later on
6 January 7th, the day the before the conditions would be
7 lifted. There was no other communications in between.
8 So it --

9 **Q.** Did you --

10 **A.** Sorry.

11 **Q.** Sorry, did you have something further to say?

12 **A.** No. Go ahead.

13 **Q.** You declined to lower the price on the subject
14 property, correct?

15 **A.** I declined their request.

16 **Q.** And you declined to remove the Instrument as well?

17 **A.** Yes.

18 **Q.** And because of the amount of interest in the subject
19 property, you weren't willing to take any steps or
20 expel any resources regarding the subject property,
21 like to remove the Instrument, correct?

22 **A.** I was not going to remove that Caveat. I had -- there
23 was no reason for me to do. There's actually no reason
24 for me to do it.

25 **Q.** And that was partly because of the time and the expense

1 associated with doing so?

2 **A.** Well, it -- it -- I'm selling the house. I'm getting
3 rid of a house in an estate. I -- I -- make it someone
4 else's problem. It's not my problem. Houses all over
5 Mount Royal still have a Caveat on them. It's not a
6 requirement of me selling the house to remove it. I
7 just -- I want -- I wanted to have -- get rid of the
8 property as quickly as I could.

9 **Q.** Sir, at that time do you recall being asked about what
10 the nature of the Instrument was or if you had a copy
11 of the Instrument?

12 **A.** I do not have any recollection of being asked that at
13 that time.

14 **Q.** Did you -- do you recall being asked at any time after
15 the offer was made and the waiving of the conditions?

16 **A.** About the nature of it?

17 **Q.** If you knew what the Caveat related to or if you had a
18 copy?

19 **A.** I did not -- I do not, did not, never had a copy of it,
20 and I have no idea what it said.

21 **Q.** Right, I understand. But do you recall being asked for
22 that in between the time of the offer --

23 **A.** Asked by who?

24 **Q.** By your realtor, Gordon Ross.

25 **A.** He -- he did not ask. He knew -- he knew -- he had

1 searched it. He saw that the thing at Land Titles, it
2 wasn't there. He knew -- he knew -- he knew that.

3 **Q.** The sale of the subject property closed on
4 January 31st, 2020, correct?

5 **A.** The initial transfer of ownership happened on
6 January 31st.

7 **Q.** And while you were removing items at the subject
8 property, do you recall Mr. Lalji showing the subject
9 property to some potential tenants?

10 **A.** Yes. I agreed. I was being cooperative. Because my
11 understanding was that the purchasers wanted to rent
12 the house, and would I be amenable to having Mr. Lalji
13 show potential renters the house, and I agreed to that,
14 regretfully now.

15 **Q.** Thank you. And you still had possession of the subject
16 property at the time, correct?

17 **A.** During -- during -- between January 8th, 2020, and
18 January 31st possession, yes. Mr. Lalji on several
19 occasions brought, after contacting either -- either
20 through Gordon and then I just said he could contact me
21 directly and not go through Gordon, it's simple. Why
22 -- why have another link in the chain? So Kamil
23 actually was -- when he wanted to show it, he would
24 contact me directly because it was just easier. And
25 there were several occasions -- I don't know exactly

1 how many -- where he brought potential renters to the
2 property between January 8th, 2020, and January 31st,
3 2020, yes.

4 **Q.** And that was after the conditions were waived?

5 **A.** That's was January 8th, 2020, conditions were waived,
6 possession date was January 31st, and during that time
7 frame is when Mr. Kamil Lalji entertained prospective
8 renters.

9 **Q.** And then one occasion you briefly spoke with Mr. Lalji,
10 correct?

11 **A.** One of -- one of the times after the closing, after the
12 conditions were lifted when the renters were there, he
13 and I had a discussion, yes.

14 **Q.** And at that time you asked about what the Tejpars
15 planned to do with the subject property, correct?

16 **A.** Well, I kind of suspected what their plan was from the
17 first day when they asked if I was going to subdivide
18 the lot. But, yes, we had a conversation. We just
19 talked about the fact that obviously they were going to
20 subdivide the lot, and they're going build their house
21 and they're either going to try to sell the other lot.
22 Yeah, we talked about that.

23 **Q.** And at the time you stated you also considered
24 subdividing the subject property but that you didn't
25 want to go through the effort, correct?

1 **A.** I -- you know, with -- with my father prior to his
2 death, over many years he and I had talked about, you
3 know, the fact that that lot was subdividable. That
4 was a possibility. After he passed away, I considered
5 perhaps subdividing the lot. I looked into what was
6 involved in subdividing a lot, and I just -- this is
7 not -- I don't need to go down this path. This is
8 something I'm not interested in doing. And so it
9 just -- it's that simple. It's just the time and the
10 effort and cost, and the reward at the end may not be
11 what you think, that's all. My impression would be to
12 subdivide the lot to -- to split two lots and maybe
13 make a -- a little higher -- you know, get a little
14 higher price. Well, after checking all the numbers,
15 you know, it just wasn't worth my effort.

16 **Q.** And so we previously discussed that the sale of the
17 property closed on January 31st, 2020?

18 **A.** Yes.

19 **Q.** And so you were still the registered owner of the
20 subject property on January 16th, 2020, correct?

21 **A.** January 16th, yes.

22 **Q.** And you received correspondence from Jeffrey Woodruff
23 of Glenn & Card Law LLP on or about January 16th, 2020?

24 **A.** I guess so.

25 **MR. MARBLE:** Is that correspondence somewhere

1 that you can refer the witness to, counsel?

2 MS. MANSFIELD: Does he have a copy of
3 Mr. Engbloom's undertakings available to him?

4 MR. MARBLE: I don't know that they would be in
5 front of him right now, no.

6 Q. MS. MANSFIELD: Mr. Schulli, do you recall
7 receiving any correspondence in January 2020 from Glenn
8 & Card Law?

9 A. I recall receiving some correspondence. I don't know
10 the name of the company, but it was a law firm, yes.

11 Q. And that correspondence related to the removal of
12 Caveat 7648FT that was registered on a property a few
13 houses away from the subject property at 1002 - 32
14 Avenue Southwest?

15 A. Yeah.

16 MR. MARBLE: Can you ask if he remembers that?
17 Because, again, like, if you want to show him the
18 letter and we can do a share screen and do that, but I
19 don't think it's fair to ask him to guess at a letter
20 from however many months ago that is.

21 Q. MS. MANSFIELD: So, sir, you do -- you said you
22 remembered receiving a letter from a law firm, but
23 you're not quite sure what firm it might have been,
24 correct?

25 A. No, I don't know the name of the firm. There was a

1 letter from a law firm, yes.

2 **Q.** And what did that letter say?

3 **MR. MARBLE:** Again, counsel, no. You're
4 asking -- you're asking the witness to try and recall
5 something from months ago. Unless you put it to him,
6 I'm not going to allow this.

7 **MS. MANSFIELD:** He says he recalls receiving the
8 letter.

9 **MR. MARBLE:** And so if you want to ask him, do
10 you remember the contents of that letter, you can ask
11 that, but that wasn't your question.

12 **MS. MANSFIELD:** Thank you.

13 **MR. MARBLE:** Put the letter to him.

14 **OBJECTION TAKEN to answering the question:** And what did
15 that letter say?

16 **Q.** **MS. MANSFIELD:** Mr. Schulli, do you recall the
17 contents of that letter when you received it?

18 **A.** I recall it had do with removing the Caveat at
19 1002 - 32 Avenue.

20 **Q.** And do you recall if that letter related to an upcoming
21 application?

22 **A.** I have no idea.

23 **Q.** And did you contact the author of the letter after you
24 received it?

25 **A.** No.

1 Q. Did you forward this correspondence to the Tejpars?

2 A. No.

3 Q. Did you advise Mr. Ross you had received this
4 correspondence?

5 A. No.

6 MS. MANSFIELD: And, sir, if we could take a
7 five-minute break? I'm just going to review my notes
8 and then we should be finished shortly.

9 (ADJOURNMENT)

10 Q. MS. MANSFIELD: Mr. Schulli, I just have a few
11 more questions for you, and then we'll let you go for
12 the afternoon.

13 So at no time prior to January 31st, 2020, did you
14 have -- you didn't have any information about any
15 restrictions on the subject property that would
16 prohibit subdividing the lot, correct?

17 A. Sorry, could you repeat that?

18 Q. Sure. I just want to make sure I understand your
19 evidence from earlier. So prior to January 31st, 2020,
20 you had no information about any restrictions on the
21 subject property that would prevent or prohibit
22 subdividing the lot, correct?

23 MR. MARBLE: I don't think that's what his
24 evidence was, counsel.

25 MS. MANSFIELD: Okay. So I'm asking the question,

1 then. That was my misunderstanding.

2 OBJECTION TAKEN to answering the question: Sure. I just
3 want to make sure I understand your evidence from
4 earlier. So prior to January 31st, 2020, you had no
5 information about any restrictions on the subject
6 property that would prevent or prohibit subdividing the
7 lot, correct?

8 **Q.** MS. MANSFIELD: At any time prior to January 31st,
9 2020, did you have any information about any
10 restrictions on the subject property that would
11 prohibit subdividing the lot?

12 **MR. MARBLE:** Again, I don't think your question
13 is fair to the witness. He's already given you
14 evidence that the Caveat was registered. If you want
15 to ask him about that, that's fine.

16 **MS. MANSFIELD:** He said he -- I'm asking a
17 different question now. I'm not asking him about the
18 Caveat.

19 **Q.** MS. MANSFIELD: I'm asking him if any time prior
20 to January 31st, 2020, Mr. Schulli, did you have any
21 information about any restrictions on the subject
22 property that would prohibit subdividing the lot?

23 **A.** I did not have information of anything that said the
24 lot could not be subdivided.

25 **MS. MANSFIELD:** Perfect. Thank you for your time.

1 Those are all my questions, subject to anything arising
2 from the undertakings.

3

4 (Proceedings ended at 1:57 p.m.)

5

6 Certificate of Transcript

7

8 I, the undersigned, hereby certify that the foregoing pages
9 1 to 40 are a complete and accurate transcript of the
10 proceedings taken down by me in shorthand and transcribed
11 from my shorthand notes to the best of my skill and
12 ability.

13

14 I further certify that this questioning was conducted in
15 accordance with the Alberta Protocol for Remote
16 Questioning, Revised 05/05/2020.

17

18 Dated at the City of Calgary, Province of Alberta, this
19 13th day of May, 2021.

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Sandra Dreher

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Sandra Dreher, CSR(A)

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Official Court Reporter

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- I N D E X -

DAVID SCHULLI

April 30, 2021

The following is a listing of exhibits, undertakings and objections as interpreted by the Court Reporter.

The transcript is the official record, and the index is provided as a courtesy only. It is recommended that the reader refer to the appropriate transcript pages to ensure completeness and accuracy.

EXHIBITS

(No Exhibits)

UNDERTAKINGS REQUESTED

UNDERTAKING NO. 1 - For David Schulli to review 8
his records and to provide copies of the emails
between himself and Mr. Engbloom relating to this
application and his cross-examination -

TAKEN UNDER ADVISEMENT

1	UNDERTAKING NO. 2 - For David Schulli to review	19
2	his records and to produce a copy of the letter	
3	that Gordon Ross sent to his father in 2018	
4	regarding a potential sale of the property - Best	
5	Efforts	
6		
7	***OBJECTIONS***	
8	OBJECTION TAKEN to answering the question: And	16
9	are you involved in any of those fundraising	
10	efforts?	
11		
12	OBJECTION TAKEN to answering the question:	17
13	Mr. Schulli, have you made any donations towards	
14	the injunction application?	
15		
16	OBJECTION TAKEN to answering the question: And so	24
17	what was it that you would normally discuss? What	
18	did you actually discuss?	
19		
20	OBJECTION TAKEN to answering the question: And	37
21	what did that letter say?	
22		
23		
24		
25		

1 OBJECTION TAKEN to answering the question: Sure. 39

2 I just want to make sure I understand your
3 evidence from earlier. So prior to January 31st,
4 2020, you had no information about any
5 restrictions on the subject property that would
6 prevent or prohibit subdividing the lot, correct?

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