

**IN THE COURT OF APPEAL FOR SASKATCHEWAN**

Between:

**RANDY KOROLUK**

**Appellant  
(Applicant/Respondent)**

- and -

**KPMG INC.**

**Respondent  
(Respondent/Applicant)**

- and -

**PRIMEWEST MORTGAGE INVESTMENT CORPORATION, DAN ANDERSON, TOM ARCHIBALD, FRANCIS BAST, DOUG FRONDALL, MIKE HOUGH, WILSON OLIVE, TOM ROBINSON, IRENE SEIFERLING, ERNST & YOUNG INC.**

**Respondents (Respondents)**

- and -

**DIRECTOR OF CORPORATIONS, CANADA REVENUE AGENCY, P.I. FINANCIAL, DONALD ZEALAND, GRANITE ENTERPRISES, DEBBIE GLORIA BURWASH**

**Non-parties (Non-parties)**

**NOTICE OF MOTION TO PERFECT APPEAL**

TAKE NOTICE:

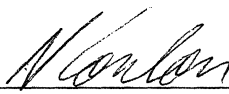
1. THAT the Respondent intends to apply to the presiding judge of the Court of Appeal, sitting in chambers, at the Court House, 2425 Victoria Avenue Regina, Saskatchewan on Wednesday the 10th day of February, 2021 at 10:00 a.m. for the following relief:

- (a) An order pursuant to Rule 46(1) of *The Court of Appeal Rules* requiring that this appeal be perfected promptly, failing which it may be exposed to dismissal for want of prosecution.

- (b) An order pursuant to Rule 52 of *The Court of Appeal Rules* that the Respondent be awarded the costs of this application.
2. THAT the following material will be filed in support of this application:
- (a) This notice of motion with proof of service.
  - (b) The affidavit of Nicholas Conlon.
  - (c) A draft order requiring perfection in accordance therewith.
  - (d) A memorandum specifying the basis for the application.

DATED at the City of Saskatoon, Saskatchewan, this 1<sup>st</sup> day of February, 2021.

**W LAW LLP**

Per:   
Mike Russell and Nicholas Conlon,  
Solicitors for the Respondent  
(Respondent/Applicant),  
KPMG Inc.

TO: ALL RECIPIENTS ON THE SERVICE LIST

**THIS NOTICE OF MOTION WAS DELIVERED BY:**

Name of firm:	<b>W Law LLP</b>
Names of lawyers in charge of file:	Mike Russell and Michelle Tobin
Address of legal firms:	Suite 300, 110 – 21 <sup>st</sup> Street East Saskatoon, Saskatchewan S7K 0B6
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