

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

IN THE MATTER OF

**TITAN INVESTMENTS LIMITED PARTNERSHIP, and TITAN GENPAR INC., and
EVOLUTION CAPITAL MANAGEMENT LTD., and THE ESTATE OF DAVID COMTE,
DECEASED, and THE COMTE FAMILY TRUST and PREDATOR HOLDING LTD.**

**IN THE MATTER OF THE *JUDICATURE ACT*, RSA 2000, c.J-2, and RULES 467 and 468 OF
THE ALBERTA RULES OF COURT**

NOTICE OF MOTION

TAKE NOTICE that an application will be made by counsel for Alger & Associates Inc. as Receiver and Manager before the Honourable Mr. Justice LoVecchio in Chambers, at the Court House at 611 – 4th Street SW, in the City of Calgary, in the Province of Alberta, on Monday the 11th day of December, 2006 at the hour of 9:30 a.m. in the forenoon, or so soon thereafter as counsel may be heard, for an Order:

- (a) abridging the time for service, if necessary, and deeming service good and sufficient;
- (b) approving and passing the accounts of the Receiver for the period ending August 31, 2006;
- (c) approving and passing the accounts of counsel to the Receiver; and
- (d) such further and other relief as the Court sees fit.

AND FURTHER TAKE NOTICE that in support of the within application will be read the Affidavit of Michael Costello, to be filed herewith, and such further and other material as counsel may advise and this Honourable Court may direct.

AND FURTHER TAKE NOTICE that the grounds upon which the within motion is made are as follows:

- (e) the order of Justice S. J. LoVecchio dated December 27, 2004 appointing the Receiver and in particular paragraph 10 thereof requiring the Receiver pass its accounts from time to time; and
- (f) the fees billed and the time spent by the professional parties were required and reasonable.

DATED at the City of Calgary, in the Province of Alberta, this 9 day of November, 2006.

FLEMING LLP

Per:


Clive O .Llewellyn

TO: THE CLERK OF THE COURT

AND TO: ALL PARTIES ON THE ATTACHED SERVICE LIST

COMPLETE SERVICE LIST AS AT NOVEMBER 3, 2006
(includes all Unpaid Investors, and Overpaid Investors that have not settled
on repayment of false profits,
but who have since repaid or agreed to repay their judgment amounts)

#	Company	E-mail	Represented by:	Contact	E-mail address (and/or Fax)
1.	Axsen, Croft	jencor1@telus.net			
2.	Bellamy, David	david136@shaw.ca			
3.	Benteau, Judy				
4.	Botros, George	gbotros@shaw.ca			
5.	Carlson, Daryl				
6.	Chaque Investments LP	guy50@telus.net			
7.	Churchill, Wendy	wchurchill@telus.net			
8.	Chute, D.M. Ryan	r050177c@hotmail.com			
9.	Dowsett, F. Ernest	erniedowsett@hotmail.com			
10.	Ebanks, Sonia				
11.	4513517 Manitoba Ltd.	qtdewev@sasktel.net			
12.	Graefer, Dale & Rozann	rgrafer@sasktel.net			
13.	Hailey Investment Corporation	jon_carlson@transcanada.com			
14.	Halliday, Alton & Firth Heidie	adhalliday@accesswave.ca			
15.	Henshaw, Bernadette (to counsel)	bhenshaw@telus.net	McLennan Ross	Don Dear	ddear@mross.com
16.	Huronina Holdings Inc.	judan88@hotmail.com			
17.	Jarvis, Alan	jarvisin@telusplanet.net			
18.	Koch, Craig	cdkoch@shaw.ca			
19.	Krog, Joanne	jokrog@shaw.ca			
20.	Kurtz, Kenneth & Louise	ken.kurtz@sasktel.net			
21.	Laing, Bruce				
22.	Legend Motors Inc.	racingadventures@nucleus.com			
23.	Maher, Francis	edm@marexinc.ca			
24.	Maher's Polypipe Ltd.	edm@marexinc.ca			
25.	Marcotte Properties Ltd.	d.marcotte@sasktel.net			
26.	Marcotte, Darren	marcottedarren@hotmail.com			
27.	Marcotte, Lana	Lana.Marcotte@sasktel.sk.ca			
28.	Marcotte (Knox), Laurie	darrenlaurie@shaw.ca			
29.	Marcotte, Leslie	ldimarcotte@hotmail.com			
30.	Marcotte, Michel & Donna	d.marcotte@sasktel.net			
31.	McBride, Debra	debracarlson@shaw.ca			
32.	McHarg, Dianne				
33.	McLeod, Marlene	mi.mcleod@shaw.ca			
34.	Moldowan, Marilyn	mmoldowan@shaw.ca			
35.	Moore, Gordon	gord.moore@shaw.ca			
36.	MS Computing Ltd.	tsudol@shaw.ca			
37.	Murias, Tim & Betina	Betina_Murias@Hotmail.com			
38.	Murley, Sandra	dmtrading@shaw.ca			
39.	Naples Ventures Inc.	judan88@hotmail.com			
40.	Newell, Sandra	snewell@primus.ca			
41.	1043068 Alberta Ltd.	r1379@telus.net			

#	Company	E-mail	Represented by:	Contact	E-mail address (and/or Fax)
50.	Reitman, Vladimir & Ljubov	selectionoil@yahoo.com			
51.	Rosen, Ruth				
52.	706889 Alberta Ltd.	mmoldowan@shaw.ca			
53.	781592 Alberta Ltd.	chase.clinic@shaw.ca			
54.	Southern Ag-Ventures Ltd. (c/o Stewart Kurtz, President)	stewartkurtz@sasktel.net			
55.	Stroud, Gail & Roger Jackson				
56.	Sy-Hua Chiu Professional Corp.				
57.	Technology & Research Co. Inc.	tsudol@shaw.ca			
58.	Technology and Research Inc.	tsudol@shaw.ca			
59.	Theriault, Lane	lane_theriault@hotmail.com			
60.	Tina Card Management Inc.	tinacard@shaw.ca			
61.	Tugwell, Michael	mtiet@shaw.ca			
62.	TVP Western Canada Inc.	camelot@incentre.net			
63.	Zankl, Karla				
64.	Zichy, Les & Mickey	pmickey@shaw.ca			
65.	Zurcher, Heinz	z770@shaw.ca			

Action No.: 0401-19905

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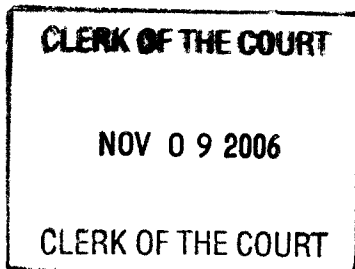
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FLEMING LLP
Barristers & Solicitors
1500, 736 – 6th Avenue SW
Calgary, Alberta T2P 3T7

Attention: Clive O. Llewellyn
Phone: 403.266.5550
Fax: 403.265.6910



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