

**Exhibit 1**

**Exhibit 1**

1 Keith Beauchamp (012434)  
2 Roopali H. Desai (024295)  
3 **COPPERSMITH BROCKELMAN PLC**  
4 2800 North Central Avenue, Suite 1900  
5 Phoenix, Arizona 85004  
6 T: (602) 381-5490  
7 F: (602) 224-6020  
8 kbeauchamp@cblawyers.com  
9 rdesai@cblawyers.com  
10 *Attorneys for Plaintiff*

8 **ARIZONA SUPERIOR COURT**  
9 **MARICOPA COUNTY**

10 FIERCE INVESTMENTS LTD.,	)	No. CV2018-006866
	)	
11 Plaintiff,	)	
	)	
12 v.	)	<b>DECLARATION IN SUPPORT OF</b>
	)	<b>APPLICATION FOR ENTRY OF</b>
13 AZTEC COPPER INC., an Arizona	)	<b>DEFAULT</b>
14 corporation,	)	
	)	
15 Defendant.	)	(Assigned to Hon. Lindsay Abraham)
	)	
16	)	

17  
18 Pursuant to Rule 80(c), Ariz. R. Civ. P., Roopali Desai declares as follows:

- 19 1. I am one of the attorneys for Plaintiff Fierce Investments Ltd. and file this  
20 Application in accordance with Rule 55, Ariz. R. Civ. P.
- 21 2. Plaintiff caused the Summons, Complaint, and Certificate of Compulsory  
22 Arbitration to be served upon Defendant Aztec Copper Inc. ("Aztec") on May 4, 2018 by Kiwi  
23 Process Service through its statutory agent, National Registered Agents Inc. A copy of the  
24 Declaration of Service is attached hereto as Exhibit A.
- 25 3. Rule 12(a)(1)(A)(i), Ariz. R. Civ. P., Aztec had until May 24, 2018, to file an  
26 answer or otherwise respond to the Complaint.

1 4. As of today's date, Aztec has not answered or otherwise responded to the  
2 Complaint, and the Court docket does not reflect that a response has been filed by Aztec. In  
3 addition, Aztec has failed to answer or otherwise respond to a separate action filed by Plaintiff  
4 seeking to exercise Plaintiff's statutory right to inspect Aztec's books and records. *See Fierce*  
5 *Investments Ltd. v. Aztec Copper, Inc.*, No. CV2018-003675 (Arizona Superior Court,  
6 Maricopa County). Plaintiff is seeking entry of a default judgment in that action as well.

7 5. Upon information and belief, the Directors and Officers of Aztec are aware of the  
8 Complaint. Stephen C. Snyder, a Canadian Barrister/Solicitor, has advised undersigned  
9 counsel in writing that he represents Aztec's President/CEO, Ron Arnold, and Aztec's  
10 Director, Christine Reeves. Mr. Snyder has also stated that he is "...legal counsel to 1829752  
11 Alberta Inc., previously Aztec Copper Inc. . . ." *See* Letter from S. Snyder to K. Beauchamp  
12 (02/09/2018) (attached to the Application for Entry of Default as Exhibit 2) (emphasis added).

13 6. To comply with the requirements of 50 U.S.C. § 520, the undersigned verifies  
14 that Aztec is not an infant, incompetent, or in the military service.

15 I declare under penalty of perjury that the foregoing is true and correct.

16  
17 EXECUTED this 2nd day of July, 2018.

18  
19 /s/ Roopali Desai \_\_\_\_\_  
20  
21  
22  
23  
24  
25  
26

# **Exhibit A**

**Exhibit A**

IN THE MARICOPA COUNTY SUPERIOR COURT  
FOR THE STATE OF ARIZONA

18 MAY 14 AM 11:41

FIERCE INVESTMENTS LTD.,  
Plaintiff(s)/Petitioner,

CASE NO.: CV2018-006866

vs.  
AZTEC COPPER INC.,  
Defendant(s)/Respondent.

**DECLARATION OF SERVICE**

Bruce Comer #Mc-7307, the undersigned, declares under the penalty of perjury: I am a licensed private process server in Maricopa County and I am fully qualified pursuant to A.R.S. Rule 4(e), governing Service of Process in the State of Arizona to serve process in this case. I received for service the following documents in this action:


- **SUMMONS**
- **COMPLAINT**
- **CERTIFICATE OF COMPULSORY ARBITRATION**

from **COPPERSMITH BROCKELMAN PLC** located in Phoenix, Arizona on 5/4/2018 13:31. I personally served copies of the documents listed above on those named in the manner, date, and time listed below. All services except where noted were made in Phoenix, Arizona.

**ENTITY:** **AZTEC COPPER INC**  
**C/O NATIONAL REGISTERED AGENTS INC.**

**DATE & TIME:** 5/4/2018 15:29  
**ADDRESS:** 3800 NORTH CENTRAL AVENUE, SUITE 460 PHOENIX, AZ, 85012, the usual place of business.  
**MANNER:** by serving Krikor Kalaydjian , a person authorized to accept service.  
**DESCRIPTION:**  
**NOTES:**

**Date: May 11, 2018**

  
\_\_\_\_\_  
Bruce Comer #Mc-7307

**STATEMENT OF COSTS**

SERVICE	16.00
MILEAGE	16.00
RUSH FEES	25.00
ADDITIONAL MILEAGES	
SKIP TRACE	
SPECIAL HANDLING	
STAKEOUT	
DOCUMENT PREPARATION	10.00
<b>TOTAL</b>	<b>\$67.00</b>

**Exhibit 2**

**Exhibit 2**

# SNYDER & ASSOCIATES LLP

#2500 SUN LIFE PLACE, 10123 - 99 STREET, EDMONTON AB T5J 3H1  
PHONE: 780-426-4133 • FAX: 780-424-1588  
WEB SITE: WWW.SNYDER.CA

BARRISTERS & SOLICITORS

**Stephen C. Snyder** Barrister & Solicitor  
E-Mail: [ssnyder@snyder.ca](mailto:ssnyder@snyder.ca)

Your Ref:

Our Ref:

/SCS

February 9, 2018

Coppersmith Brockelman  
2000 North Central Avenue  
Suite 1900  
Phoenix, Arizona 85004

Attention: Keith Beauchamp

Dear Sir:

Re: Demand to Inspect Books and Records of Aztec Copper Inc.

The undersigned are legal counsel to 1829752 Alberta Inc., previously Aztec Copper Inc., and in that capacity have received your correspondence of the 26th of January 2018.

In the second paragraph of your letter, you make reference to the Arizona Corporations and Associations Act. The company which I represent, 1829752 Alberta Ltd., previously Aztec Copper Inc., is a creature of statute, incorporated pursuant to the provisions of the Business Corporations Act being a statute enacted by the legislature of the Province of Alberta. To the best of my knowledge, this company has not been extra nationally registered in Arizona and is not, therefore, subject to the provisions of the Arizona Corporations and Associations Act. Am I missing something?

I look forward to hearing from you at your convenience and remain,

Yours truly,

SNYDER & ASSOCIATES

PER:



STEPHEN C. SNYDER

SCS/bj

VIA FAX 602 224 6020