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July 6, 2022

VIA E-MAIL

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Calgary Courts Centre
Court of Queen's Bench of Alberta
601 – 5 Street S.W.
Calgary, Alberta
T2P 5P7

Attention: The Honourable Madam Justice B.E.C. Romaine

Dear My Lady:

**Re: In the Matter of the Bankruptcy of North American Steel Erectors Inc. - Court
File No.: BK01 095206**

We are counsel for MNP Ltd. (the "**Trustee**") in its capacity as the trustee in bankruptcy of the bankrupt estate of North American Steel Erectors Inc.

With respect to the hearing in the above referenced matter scheduled before your Ladyship as the presiding Commercial List Justice for 10:30 a.m. on Thursday, July 7, 2022, please find enclosed the following:

1. An unfiled copy of the First Report of the Trustee dated July 6, 2022 (the "**Trustee's Report**");
2. A copy of *Polar Products Inc. v. Hongkong Bank of Canada*, 1992 CanLII 1321 (BC SC) which we may reference at the hearing; and
3. A copy of *Re Giambattista*, 2009 CanLII 2912 (ON SC) which we may reference at the hearing.

Please note that we are currently filing the Trustee's Report with the Court via e-mail and will provide your office with filed copies once we receive same back from the Clerk of the Court. In the interests of expediency, we are providing you with an unfiled copy at this juncture, and are concurrently serving the interested parties with an unfiled copy. A filed copy will be provided to your office upon our receipt of same from the Court.

July 6, 2022

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We trust your Ladyship will find the foregoing and the enclosed in order.

Yours Truly,

CARON & PARTNERS LLP

A handwritten signature in blue ink, appearing to read "Dean Hutchison", written in a cursive style.

DEAN HUTCHISON

DH/lc

Enclosures

Cc: Service List