



June 17, 2024

Susy Trace

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DELIVERED AS PER THE SERVICE LIST

File No. 0255543.0004

Attention: The Attached Service List

Dear Sir/Madam,

**Re: Bank of Montreal v. 2093924 Ontario Inc., Hyeong Sik Kim and Hee Seon Kim
Court of King's Bench Edmonton Action Number: 2303 22127 (the "Action")
Application to be heard on: June 24, 2024 at 3:30 p.m. (the "Application")**

We are counsel to MNP Ltd., Court Appointed Receiver over the property, assets and undertakings of 2093924 Ontario Inc. With regards to the above noted Application, please find enclosed for service upon the parties noted on the service list the following unfiled materials:

1. Application of MNP Ltd.;
2. Redline of Order sought to the Alberta template order;
3. First Report of MNP Ltd. in its capacity as Receiver over 2093924 Ontario Inc. dated June 17, 2024 (the "**First Report**"); and
4. Letter to Justice Whitling enclosing materials and seeking leave to file a late brief of law.

We have submitted the Application and the First Report for filing and will provide filed cover pages to the parties noted on the service list once we are in receipt of the same. Please note that the Receiver intends to rely upon a confidential addendum to the First Report dated June 17, 2024 (the "**Confidential Addendum**"). We have provided an unfiled copy of the Confidential Addendum to Justice Whitling, however the Receiver does not intend to file or serve the Confidential Addendum and is applying for an order sealing the Confidential Addendum. Please contact the writer to request a copy of the Confidential Addendum and we will consider such request. We intend to file and serve a brief of law tomorrow in support of the Receiver's Application. Please note that any responding materials are due to be filed and served by Thursday June 20, 2024 unless leave is granted by Justice Whitling to file late materials. Thank you, and please contact the writer or your solicitor if you have any questions.

Yours truly,

MILLER THOMSON LLP

Per:

Susy Trace

Partner

ST/ss

SERVICE LIST

Bank of Montreal v. 2093924 Ontario Inc., Hyeong Sik Kim and Hee Seon Kim

Court of King's Bench Action No. 2303 22127

PARTY	COUNSEL/ADDRESS FOR SERVICE	EMAIL/FAX/COURIER
Bank of Montreal (Plaintiff)	c/o Dentons Canada LLP 2500 Stantec Tower 10220 - 103 Avenue NW Edmonton, AB T5J 0K4 Attention: Dean Hitesman	Sent via Email: dean.hitesman@dentons.com
2093924 Ontario Inc., Hyeong Sik Kim, Hee Seon Kim (Defendants)	c/o Sharek Logan & Van Leenan 2100, 10060 Jasper Avenue NW Edmonton, AB T5J 3R8 Attention: David Archibold	Sent via Email: darchibold@sharekco.com
MNP Ltd. (Receiver)	MNP Ltd. 1300, 10235 – 101 Street Edmonton, AB T5J 3G1 Attention: Karen Aylward	Sent via Email: karen.aylward@mnp.ca
Miller Thomson LLP (Counsel for the Receiver)	Miller Thomson LLP 2700, 10155-102 Street Edmonton, AB T5J 4G8 Attention: Susy Trace	Sent via Email: strace@millerthomson.com
Meridian Onecap Credit Corp.	Meridian Onecap Credit Corp. Suite 1500, 4710 Kingsway Burnaby, BC	Sent via Courier
John Deere Financial PPR Reg. No. 19031211477	John Deere Financial Inc. 3430 Superior Court Oakville, ON L6L 0C4	Sent via Courier
Canada Revenue Agency	Canada Revenue Agency Surrey National Verification and Collections Centre 9755 King George Blvd Surrey, BC V3T 5E1	Sent via Fax 1-833-697-2390



The Klair Group Industries Inc.	<p>Klair Group Industries Inc.</p> <p>Attention: Gurdeep Klair</p> <p>With a copy to Doherty Schuldhaus 219-6203 28th Avenue NW Edmonton, Alberta T6L 6K3</p> <p>Attention: Ron G. Schuldhaus</p>	<p>Sent via Email:</p> <p>gdklair@gmail.com</p> <p>ron@dslp.ca</p>
1643434 Alberta Ltd.	<p>1643434 Alberta Ltd. 553, 54418 RR 251 Sturgeon County, Alberta, T8T 0C7</p> <p>Attention: Sylvain Blouin</p>	<p>Sent via Email:</p> <p>Sylvain@rock-n-wash.com</p>

