



Clerk's stamp:

COURT FILE NUMBER

2203-19336

COURT

**COURT OF KING'S BENCH OF ALBERTA**

JUDICIAL CENTRE

EDMONTON

PLAINTIFFS

**MIKE PRIESTNER REAL ESTATE INC. and  
MPRE GP DEV INC.**

DEFENDANTS

**2399430 ALBERTA LTD., 2399449  
ALBERTA LTD., TURNIP HOMES INC., and  
HENOK KASSAYE**

DOCUMENT

**FEE AFFIDAVIT**

ADDRESS FOR SERVICE AND  
CONTACT INFORMATION OF  
PARTY FILING THIS DOCUMENT

**Receiver:**  
MNP Ltd.  
Suite 1300, MNP Tower  
10235 – 101 Street NW  
Edmonton, AB, Canada T5J 3G1  
Attention: Kristin Gray  
Phone: 780.705.0073 Fax: 780.409.5415  
kristin.gray@mnp.ca

**Counsel:**  
McLennan Ross LLP  
600 McLennan Ross Building  
12220 Stony Plain Road NW  
Edmonton, AB, Canada T5N 3Y4  
Attention: Ryan Trainer  
Phone: 780.482.9153 Fax: 780.482.9100  
ryan.trainer@mross.com

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**AFFIDAVIT OF KRISTIN GRAY  
SWORN ON JULY 17, 2023**

I, Kristin Gray, CPA, CA, CIRP, LIT of Edmonton, Alberta, SWEAR AND SAY THAT:

1. I am a Senior Vice-President with MNP Ltd., Receiver Manager of 2399430 Alberta Ltd. and 2399449 Alberta Ltd. (the "Receiver") and as such I have personal knowledge of the facts and matters herein deposed to except where stated to be based upon information and belief, and where so stated I verily believe the same to be true.
2. MNP Ltd. was appointed Receiver Manager of 2399430 Alberta Ltd. and 2399449 Alberta Ltd. pursuant to the Order of the Honourable Justice Neilson of the Alberta Court of King's Bench dated December 13, 2022 (the "Receivership").
3. I am a Chartered Professional Accountant and Licensed Insolvency Trustee with over 10 years of experience in the area of Insolvency and Restructuring and have been handling the day-to-day administrative work in relation to the Receivership.

4. With respect to Receiver's accounts covering fees and disbursements incurred by the Receiver for the period March 1, 2023, to June 30, 2023, which accounts are contained herein as **Exhibit "A"** (the "**Accounts**"):

- (a) The Accounts specifically outline the date of the work completed, the description of the work completed, the length of time taken to complete the work, and the name of the individual who completed the work;
- (b) The hourly rate for each and every individual employee of the Receiver who completed work in regard to the Receivership (the "**Hourly Rates**"), including Non – Professional staff is as follows:

The MNP Ltd. team:

- (i) Kristin Gray, Senior Vice-President, and Licensed Insolvency Trustee - \$600/635;
  - (ii) Steven Barlott, Senior Consultant - \$320/350;
  - (iii) Comfort Uche, Analyst - \$231/244;
  - (iv) Isobel Smith, Administration (Non-Professional) - \$205/216;
  - (v) Megan Schafer, Administration (Non-Professional) - \$139/245;
  - (vi) Liz Zhang, Administration (Non-Professional) - \$216; and
- (c) I submit that the Hourly Rates are reasonable and comparable to the hourly rates of other accountant firms within the city of Edmonton of equivalent competence and expertise in the insolvency area.

5. With respect to the Receiver's independent legal counsel, McLennan Ross LLP ("**McLennan Ross**"), accounts covering fees and disbursements incurred by counsel for the period March 18, 2023, to June 23, 2023, which accounts are contained herein as **Exhibit "B"** (the "**McLennan Ross Accounts**"):

- (a) The McLennan Ross Accounts specifically outline the date of the work completed, the description of the work completed, the length of time taken to complete the work, and the name of the individual who completed the work;
- (b) The hourly rate for each and every individual employee of the Receiver's independent legal counsel who completed work in regard to the Receivership (the "**McLennan Ross Hourly Rates**"), including Non – Professional staff is as follows:

The McLennan Ross team:

- (i) Charles P. Russell, K.C., Partner - \$675;
- (ii) Ryan Trainer, Partner - \$400;
- (iii) Marco V. Marrelli, Associate - \$325;
- (iv) Whitney Smith, Paralegal - \$135;
- (v) Lynae Anderson, Paralegal - \$125;



## EXHIBIT A

### Copies of the Receiver's Invoices

This is Exhibit " A " referred to  
in the Affidavit of

Kristin Gray

Sworn before me this 17 day

of July, 2023

Isobel Smith  
A Commissioner for Oaths in and for Alberta

**ISOBEL NICOLE SMITH**

A Commissioner for Oaths  
in and for Alberta

My Commission expires August 31, 2024  
Appointee No. 0764665

**In the Matter of the Receivership of 2394430 Alberta Ltd. and 2399449 Alberta Ltd.**

**Summary of Receiver's Fees**

**For the period of March 1, 2023, to June 30, 2023**

<b>Period</b>	<b>Invoice</b>	<b>Fees</b>	<b>Disbursements</b>	<b>GST</b>	<b>Total</b>
Mar 1, 2023 to Mar 31, 2023	10974958	17,802.80	-	890.14	18,692.94
April 1, 2023 to April 30, 2023	11038963	13,766.80	-	688.34	14,455.14
May 1, 2023 to May 31, 2023	11098774	8,348.60	-	417.43	8,766.03
June 1, 2023 to June 30, 2023	11132425	7,746.40	-	387.32	8,133.72
		<b>47,664.60</b>	-	<b>2,383.23</b>	<b>50,047.83</b>



April 26, 2023

Mike Priestner Real Estate Inc. and  
MPRE GP Dev Inc.  
10220 – 184 Street NW  
Edmonton, AB T5S 0B9

**Attention: Kyle Runzer**

**Re: In the Matter of the Receivership of 2399430 Alberta Ltd and 2399449 Alberta Ltd. (the  
"Companies")**  
**Client Number: 982968**

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Please find enclosed our Invoice No. 10974958 for professional services rendered for the period of March 1, 2023, to March 31, 2023, which we trust you will find in order.

If you have any questions, please don't hesitate to contact us.

Yours very truly,

**MNP Ltd.**  
**Receiver of 2399430 Alberta Ltd. and 2399449 Alberta Ltd.**

Per: 

Kristin Gray, CPA, CA, CIRP, LIT  
Enclosure



**INSOLVENCY & RESTRUCTURING PROFESSIONALS**  
SUITE 1300, MNP TOWER, 10235 - 101 STREET NW, EDMONTON AB, T5J 3G1  
1.866.465.1155 T: 780.455.1155 F: 780.409.5415 MNPdebt.ca

March 26, 2023

Invoice No: 10974958  
GST No: 10369 7215

Mike Priestner Real Estate Inc. and  
MPRE GP Dev Inc.  
10220 – 184 Street NW  
Edmonton, AB T5S 0B9

**Attention: Kyle Runzer**

**Re: In the Matter of the Receivership of 2399430 Alberta Ltd and 2399449 Alberta Ltd. (the  
"Companies")  
Client Number: 982968**

**PROFESSIONAL SERVICES RENDERED** by members of the staff of MNP Ltd., as Receiver of the Companies, for the period March 1, 2023, to March 31, 2023, including inter alia the following:

<b>DATE</b>	<b>STAFF</b>	<b>DESCRIPTION</b>	<b>TIME</b>	<b>FEE</b>
01-Mar-2023	SB	Correspondence with Michael Parsons of NAI Commercial ("NAI") regarding parking at 10053 Jasper Avenue ("Jasper Ave"); Correspondence with Impark regarding parking at Jasper Ave; Insurance inspection at 10503 - 81 Avenue NW ("Scona Garage") and 10507 Saskatchewan Drive ("Sask Drive");	2.50	800.00
02-Mar-2023	SB	Review invoices for payment; Correspondence with Ken Mugeridge of YMCA regarding maintenance at 10315 - 109 Street NW ("Harvest"); Various correspondence;	.80	256.00
02-Mar-2023	IS	Review mail received; Review funds received from YMCA for their March rent. Give instructions for deposit to Megan Schafer;	.30	61.50
03-Mar-2023	SB	Insurance inspection at the Jasper Ave Property;	1.50	480.00
06-Mar-2023	MS	Post funds received to Ascend. Deposit the same;	.10	13.90
06-Mar-2023	SB	Correspondence with Impark regarding canceling tickets issued while NAI was showing Jasper Ave; Various correspondence;	.50	160.00
06-Mar-2023	IS	Post funds received to Ascend;	.30	61.50

06-Mar-2023	KG	<p>Review offer on Sask Drive. Various correspondence with Vince Caputo of NAI and Ryan Trainer of McLennan Ross LLP ("McLennan Ross") regarding the next steps;</p> <p>Call with Vince Caputo of NAI and Ryan Trainer of McLennan Ross regarding the sales strategy and potential en bloc offer;</p> <p>Confirm receipt of March rent;</p> <p>Review the second offer on Sask Drive;</p> <p>Call with the lender regarding the sales strategy and offers to date;</p> <p>Review Scona signage;</p> <p>Review and approve various invoices for approval;</p> <p>Call with Ryan Trainer of McLennan Ross regarding the ATB Financial ("ATB") documentation;</p> <p>Review insurance endorsements and email correspondence to Leibel Insurance Group ("Leibel") regarding changes to the named insured;</p> <p>Correspondence with Vince Caputo of NAI regarding the Harvest expenses and property taxes for all Properties;</p> <p>Correspondence with a creditor of Jasper Ave;</p>	3.60	2,160.00
07-Mar-2023	IS	Prepare and edit miscellaneous correspondence;	1.00	205.00
07-Mar-2023	KG	<p>Call with Ryan Algar of BD&amp;P Law Firm ("BD&amp;P"), counsel to Kastel Holdings, regarding interest in Jasper Ave;</p> <p>Review changes to the Sask Drive counteroffer as proposed by McLennan Ross;</p>	.40	240.00
08-Mar-2023	SB	<p>Correspondence with Ken Muggeridge of YMCA regarding plumbing and maintenance concerns, request Soul Mechanical Ltd. ("Soul Mechanical") to address;</p> <p>Correspondence with YMCA regarding property tax notices received;</p>	.30	96.00
08-Mar-2023	IS	Edits to miscellaneous correspondence;	1.00	205.00
08-Mar-2023	KG	Various correspondence with Vince Caputo of NAI regarding the Fawkes Coffee and Doughnuts ("Fawkes") lease, Sask Drive offer, and Harvest interest;	.50	300.00



09-Mar-2023	SB	Correspondence with Ken Muggeridge of YMCA regarding plumbing, maintenance, and property tax notices received; Review various correspondence;	.70	224.00
09-Mar-2023	KG	Various correspondence with Ryan Trainer of McLennan Ross regarding the RBC discharge for Sask Drive and caveat registered by Muve Team @ Royal LePage ARTeam Realty ("Muve"); Various calls with Vince Caputo of NAI regarding the counteroffer on Sask Drive and RBC discharge issue;	.60	360.00
10-Mar-2023	KG	Call with Vince Caputo of NAI and Ryan Trainer of McLennan Ross regarding further changes to the Sask Drive offer. Accept and execute counter offer; Review Jasper Ave offer;	.80	480.00
13-Mar-2023	CU	Review and prepare bank reconciliations for February 2023;	.40	92.40
13-Mar-2023	SB	Insurance inspections at the Jasper Ave Property, submit a service request for cool temperature in the contemporary wing;	1.50	480.00
13-Mar-2023	KG	Review security legal opinion; Various correspondence with Vince Caputo of NAI and Ryan Trainer of McLennan Ross regarding further changes to the Sask Drive counteroffer and next steps in respect to the offer on Jasper Ave; Review purchaser changes to the counteroffer;	1.00	600.00
14-Mar-2023	SB	Correspondence with Ken Muggeridge of the YMCA regarding the continued plumbing issue, correspondence with Soul Mechanical regarding the same; Correspondence with Richard Tino of Leibel regarding insurance inspections at Sask Drive and Harvest;	.50	160.00
14-Mar-2023	IS	Verify deposits and bank balance;	.10	20.50
14-Mar-2023	KG	Review amended Sask Drive offer; Review changes to the Sask Drive counteroffer. Correspondence with Ryan Trainer of McLennan Ross and Vince Caputo of NAI regarding the same; Edit and finalize various correspondence;	.40	240.00

15-Mar-2023	KG	Review the final version of the Sask Drive counteroffer. Execute the same; Review the Jasper Ave offer from Kastel Holdings Ltd.; Call with Ryan Trainer of McLennan Ross regarding the Jasper Ave offer and ATB bank transactions; Email correspondence to the lender with an update on offers and the next steps; Email correspondence to Henok Kassaye of the Companies regarding outstanding information required; Call with Vince Caputo of NAI regarding the Jasper Ave offer; Call with Ryan Trainer of McLennan Ross regarding issues with the proposed counsel on the Jasper Ave offer;	1.40	840.00
16-Mar-2023	SB	Review the suggested solution and quote from Soul Mechanical regarding the plumbing issue at Harvest;	.20	64.00
16-Mar-2023	KG	Correspondence with Vince Caputo of NAI regarding the Jasper Ave offer and other issues;	.30	180.00
17-Mar-2023	SB	Review and sign offer on Jasper Ave; Attend Sask Drive to investigate the lockbox not working, and correspondence with Nik Jankovic of Muve regarding the same; Review correspondence from Soul Mechanical regarding the cool temperature at Jasper Ave;	3.00	960.00
17-Mar-2023	IS	Edit and finalize miscellaneous correspondence;	.50	102.50
17-Mar-2023	KG	Review amended Jasper Ave counteroffer. Correspondence with Ryan Trainer of McLennan Ross and Vince Caputo of NAI regarding the same; Correspondence with Steven Barlott regarding the lockbox at Jasper Ave;	.50	300.00
20-Mar-2023	SB	Correspondence with Nik Jankovic of Muve regarding the lockbox at Sask Drive, update Vince Caputo and Michael Parsons of NAI regarding the new lockbox code; Correspondence with Jorel Pepin of Fawkes regarding the lease ending and vacating the Property by March 31, update NAI regarding same; Insurance inspection at the Jasper Ave Property;	3.00	960.00

		Review additional transaction details from ATB and update listing and outstanding list; Review various invoices for payment;		
20-Mar-2023	IS	Post funds received to Ascend;	.30	61.50
20-Mar-2023	KG	Review and approve invoices for payment; Correspondence with the lender regarding the Jasper Ave offer; Correspondence with Steven Barlott regarding the lockbox at Sask Drive and the move date for Fawkes;	.50	300.00
21-Mar-2023	KG	Review the banking information provided by ATB. Email summary of outstanding information to ATB; Review correspondence from Vince Caputo of NAI on the Jasper Ave counteroffer. Call with Ryan Trainer of McLennan Ross regarding the same; Email correspondence to the lender regarding the Jasper Ave offer;	1.00	600.00
22-Mar-2023	SB	Prepare quarterly GST return for the period ending February 28, 2023;	.40	128.00
22-Mar-2023	KG	Various correspondence with Vince Caputo and Michael Parsons of NAI regarding the additional offer on Jasper Ave; Review clean counteroffer for Jasper Ave; Email correspondence to Henok Kassaye of the Companies regarding the delivery of outstanding information; Review and sign cheques; Review and approve GST returns;	.70	420.00
23-Mar-2023	SB	Correspondence with Ken Muggeridge of YMCA regarding interest in the Harvest Property;	.20	64.00
23-Mar-2023	KG	Call with the lender regarding the Jasper Ave interest and offers to date; Correspondence with Ryan Trainer of McLennan Ross and Vince Caputo of NAI regarding purchaser condition metrics; Correspondence regarding the Sask Drive registration submitted for discharge;	1.00	600.00
24-Mar-2023	SB	Insurance inspection at the Jasper Ave Property; Review various correspondence;	1.70	544.00

24-Mar-2023	KG	Receive correspondence from Henok Kassaye of the Company regarding outstanding information. Review and respond accordingly; Review the list of bank transactions provided by the Company; Follow up with the lender regarding the Jasper Ave counteroffer;	.50	300.00
27-Mar-2023	KG	Various correspondence regarding the Jasper Ave counteroffer; Call with Vince Caputo of NAI and Ryan Trainer of McLennan Ross regarding an additional offer and an update on Harvest; Review an offer from Union Bank Holdings Inc.; Correspondence with Ryan Trainer of McLennan Ross regarding a request from Turnip Homes for a month-to-month agreement at Sask Drive; Review accepted Sask Drive offer for condition date and lease reference; Review and approve invoices for payment;	1.70	1,020.00
28-Mar-2023	IS	Post disbursements to Ascend. Prepare cheques for the same; Arrange to mail;	.30	61.50
28-Mar-2023	KG	Correspondence to the lender regarding the acceptance of the Jasper Ave offer; Correspondence with NAI regarding the Union Bank Holdings Inc. offer; Email correspondence to Henok Kassaye of the Companies regarding the motorbike at Jasper Ave; Various correspondence with Ryan Trainer of McLennan Ross regarding the next steps with the Jasper Ave offer;	1.00	600.00
29-Mar-2023	SB	Edits to and submit GST returns for the Companies for December 14, 2022, to February 23, 2023, February 24, 2023, and February 28, 2023; Correspondence with Ken Muggeridge of YMCA regarding electrical maintenance at Harvest, contact Chown Electric to address same; Review various correspondence;	1.10	352.00
29-Mar-2023	IS	Phone correspondence with the CRA regarding the RT0002 filing periods and access codes for the companies;	.80	164.00

29-Mar-2023	KG	Call with Ryan Trainer of McLennan Ross regarding the Union Bank Holdings Inc. offer; Call with the lender regarding offers to date and the next steps; Call with Vince Caputo of NAI regarding the status of offers and the next steps for Harvest; Correspondence with Isobel Smith regarding the GST returns date; Email correspondence to NAI and McLennan Ross with counteroffer instructions. Execute counteroffer;	1.00	600.00
30-Mar-2023	SB	Review invoices for payment;	.50	160.00
30-Mar-2023	IS	Post disbursements to Ascend. Prepare cheques for the same; Arrange to mail;	.30	61.50
30-Mar-2023	KG	Various correspondence with Vince Caputo of NAI and Ryan Trainer of McLennan Ross regarding the counteroffer on Jasper Ave; Detailed review of the counteroffer. Execute counteroffer. Correspondence with the lender regarding the acceptance of the same;	.80	480.00
31-Mar-2023	SB	Correspondence with Soul Mechanical regarding excess heat in the contemporary wing of the Jasper Ave Property;	.20	64.00
31-Mar-2023	KG	Various correspondence regarding the acceptance of the Jasper Ave offer;	.20	120.00
<b>TOTAL</b>			<b>41.90</b>	<b>17,802.80</b>

**INVOICE SUMMARY**

PROFESSIONAL FEES		\$17,802.80
GST on Professional Fees	<u>890.14</u>	890.14

<b>TOTAL THIS INVOICE</b>		<u><b>\$18,692.94</b></u>
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The time incurred by members of the staff of MNP Ltd. on this assignment regarding the Companies for the period March 1, 2023 to March 31, 2023, was as follows:

**FEE SUMMARY**

<b>Staff</b>	<b>Position</b>	<b>Hours</b>	<b>Hourly Rate \$</b>	<b>Total \$</b>
Kristin Gray	Senior Vice President	17.90	600.00	10,740.00
Steven Barlott	Senior Consultant	18.60	320.00	5,952.00
Comfort Uche	Analyst	0.40	231.00	92.40
Isobel Smith	Administration	4.90	205.00	1,004.50
Megan Schafer	Administration	0.10	139.00	13.90
<b>Time Billed</b>		<b>41.90</b>	<b>424.89 *</b>	<b>17,802.80</b>

(\*Average)



May 18, 2023

Mike Priestner Real Estate Inc. and  
MPRE GP Dev Inc.  
10220 – 184 Street NW  
Edmonton, AB T5S 0B9

**Attention: Kyle Runzer**

**Re: In the Matter of the Receivership of 2399430 Alberta Ltd and 2399449 Alberta Ltd. (the  
"Companies")  
Client Number: 982968**

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Please find enclosed our Invoice No. 11038963 for professional services rendered for the period of April 1, 2023, to April 30, 2023, which we trust you will find in order.

If you have any questions, please don't hesitate to contact us.

Yours very truly,

**MNP Ltd.  
Receiver of 2399430 Alberta Ltd. and 2399449 Alberta Ltd.**

Per:  
Kristin Gray, CPA, CA, CIRP, LIT  
Enclosure



**INSOLVENCY & RESTRUCTURING PROFESSIONALS**  
SUITE 1300, MNP TOWER, 10235 - 101 STREET NW, EDMONTON AB, T5J 3G1  
1.866.465.1155 T: 780.455.1155 F: 780.409.5415 MNPdebt.ca

May 18, 2023

Invoice No: 11038963  
GST No: 10369 7215

Mike Priestner Real Estate Inc. and  
MPRE GP Dev Inc.  
10220 – 184 Street NW  
Edmonton, AB T5S 0B9

**Attention: Kyle Runzer**

**Re: In the Matter of the Receivership of 2399430 Alberta Ltd and 2399449 Alberta Ltd. (the  
"Companies")  
Client Number: 982968**

**PROFESSIONAL SERVICES RENDERED** by members of the staff of MNP Ltd., as Receiver of the Companies, for the period April 1, 2023, to April 30, 2023, including inter alia the following:

<b>DATE</b>	<b>STAFF</b>	<b>DESCRIPTION</b>	<b>TIME</b>	<b>FEE</b>
03-Apr-2023	SB	Insurance inspection at 10053 Jasper Avenue ("Jasper Ave"); Attend 10507 Saskatchewan Drive ("Sask Drive") and perform a move-out inspection for Fawkes Coffee and Doughnuts ("Fawkes");	2.00	640.00
03-Apr-2023	KG	Review and approve invoices for payment; Call with Ryan Trainer of McLennan Ross LLP ("McLennan Ross") regarding Court approval, allocation of fees, follow-up with ATB Financial ("ATB") on outstanding information, and the motorcycle at Jasper Ave; Call with NAI Commercial ("NAI") regarding condition removal for Sask Drive. Email to the lender regarding the same; Call with Darryl McGavigan of JLL regarding interest in Jasper Ave and the Court approval process;	1.30	780.00
04-Apr-2023	MS	Post funds received to Ascend. Deposit the same;	.10	13.90
04-Apr-2023	IS	Post disbursements to Ascend. Prepare cheques for the same; Arrange to mail; Various estate administration tasks; Review funds received. Arrange deposit of the same;	1.00	205.00



04-Apr-2023	KG	Sign cheques; Follow up with the lender on the Sask Drive response; Call with NAI regarding the Sask Drive counteroffer and strategy; Review the Sask Drive counteroffer and correspondence to the lender regarding the same. Call with Ryan Trainer of McLennan Ross regarding the same;	.60	360.00
05-Apr-2023	KG	Call with NAI regarding Sask Drive and the tour at Harvest; Follow up with the lender;	.30	180.00
06-Apr-2023	IS	Post disbursement to Ascend. Prepare cheque for the same;	.20	41.00
06-Apr-2023	KG	Call with NAI regarding Sask Drive progress; Email correspondence to the lender;	.20	120.00
10-Apr-2023	SB	Insurance inspection at Jasper Ave Property; Correspondence with the CRA regarding a GST return; Call with Ken Muggerridge of the YMCA regarding the lighting maintenance required;	1.70	544.00
10-Apr-2023	KG	Review amendment. Execute. Various correspondence with NAI regarding the same;	.50	300.00
11-Apr-2023	SB	Call with CRA regarding outstanding RT0001 GST returns; Review service call details from Soul Mechanical Ltd. ("Soul Mechanical") for the Jasper Ave property;	.10	32.00
11-Apr-2023	IS	Post various updates to the Receiver's case website;	.70	143.50
11-Apr-2023	KG	Receive correspondence from Ryan Trainer of McLennan Ross regarding ATB transactions and ownership of the motorcycle; Correspondence with Vince Caputo of NAI regarding the Sask Drive offer. Review the response to the Sask Drive amendment; Email correspondence to NAI regarding the marketing reports; Review and approve invoices for payment;	.40	240.00
12-Apr-2023	SB	Draft the Receiver's Second Report to Court ("Second Report");	2.00	640.00

12-Apr-2023	KG	Various correspondence regarding the Sask Drive counteroffer; Give instructions to NAI regarding the counteroffer; Give instructions to Steven Barlott to prepare a summary of utility invoices for Jasper Ave. Review summary; Receive various correspondence from Ryan Trainer of McLennan Ross and Mandy Deren Dube of MLT Aikins LLP ("MLT") regarding the outstanding information, the motorcycle at Jasper Ave, and payment of December Muve Team @ Royal LePage ARTeam Realty ("Muve") rent; Receive correspondence from ATB regarding the outstanding information;	1.00	600.00
13-Apr-2023	CU	Prepare March bank reconciliations;	.40	92.40
13-Apr-2023	SB	Insurance inspection at 10503 81 Avenue NW ("Scona Garage");	.80	256.00
13-Apr-2023	IS	Prepare and edit miscellaneous correspondence;	1.50	307.50
14-Apr-2023	SB	Prepare summary and copies of invoices of Receiver's utility and HVAC costs at Jasper Ave to date for NAI to provide to the purchaser;	1.00	320.00
15-Apr-2023	SB	Insurance inspection at Jasper Ave;	1.50	480.00
17-Apr-2023	SB	Edits to the Second Report;	1.00	320.00
18-Apr-2023	SB	Edit the Second Report. Send the same to Kristin Gray for review and comment; Correspondence with Soul Mechanical regarding Harvest letter for insurance;	5.00	1,600.00
18-Apr-2023	IS	Post disbursements to Ascend. Prepare cheques for the same; Arrange to mail; Various estate administration tasks; Review funds received. Post the same to Ascend;	.70	143.50
18-Apr-2023	KG	Email correspondence to the lender regarding Sask Drive and the return of the deposit; Various correspondence from McLennan Ross regarding the return of the deposit; Review and approve invoices for payment;	.30	180.00

19-Apr-2023	SB	<p>Prepare Fee Affidavit for Second Report;  Prepare Receipts and Disbursements summary;  Compile Appendices for the Second Report;  Discussion with Kristin Gray regarding RT0002 GST accounts;  Correspondence with Nik Jankovic of Muve regarding building maintenance and new lockbox code;  Review letter regarding insurer-requested plumbing details from Soul Mechanical and send to Richard Tino of Leibel Insurance Group ("Leibel");  Provide additional utility related details to NAI;</p>	3.00	960.00
19-Apr-2023	KG	<p>Receive an update on Harvest, Sask Drive, and Scona Garage from Vince Caputo of NAI;  Edits and changes to the Second Report;</p>	1.20	720.00
20-Apr-2023	SB	<p>Edits to Second Report;  Review invoices for payment;</p>	.50	160.00
20-Apr-2023	IS	<p>Various estate administrative tasks relating to banking matters;  Post disbursements to Ascend. Prepare cheques for the same;  Arrange to mail;</p>	.50	102.50
20-Apr-2023	KG	<p>Edits and changes to the Second Report. Email correspondence to Ryan Trainer of McLennan Ross regarding the same;  Edits and changes to the R&amp;D as at April 20, 2023;  Review and approve invoices for payment. Correspondence with Steven Barlott regarding prefilling GST returns;</p>	.50	300.00
21-Apr-2023	SB	<p>Edits to Second Report from Ryan Trainer of McLennan Ross;  Print finalized Second Report and Appendices;  Insurance inspection at Jasper Ave;</p>	2.50	800.00
21-Apr-2023	KG	<p>Review changes to the Second Report proposed by McLennan Ross. Give instructions to Steven Barlott;  Correspondence to Ryan Trainer of McLennan Ross regarding the outstanding EPCOR issue and service list;  Review Sale and Vesting Order ("SAVO") application materials;  Email correspondence to Henok Kassaye of</p>	.60	360.00

		the Company regarding the production of outstanding information and ownership details for the motorcycle;		
24-Apr-2023	SB	Remit nil quarterly GST returns for the RT1 account from January 11, 2022, to December 13, 2022; Call CRA regarding cancellation of RT1 account and filing periods post receivership; Review and edit various correspondence;	1.00	320.00
24-Apr-2023	IS	Finalize the Second Report. Review the same with Kristin Gray; Finalize and swear fee affidavit; Various correspondence with Kristin Gray and Ryan Trainer of McLennan Ross; Post website update;	2.50	512.50
24-Apr-2023	KG	Review the final version and appendices of the Second Report. Execute; Review and swear fee affidavit; Give instructions regarding a website update; Edit and finalize various correspondence; Review and approve invoices for payment;	.70	420.00
25-Apr-2023	SB	Correspondence regarding graffiti on Scona Garage;	.10	32.00
25-Apr-2023	IS	Post disbursement to Ascend. Prepare a cheque for the same; Arrange to mail; Review and approve bank balances;	.30	61.50
26-Apr-2023	IS	Edit and finalize miscellaneous correspondence;	.50	102.50
26-Apr-2023	KG	Edit correspondence to Henok Kassaye regarding outstanding accounting information required for pre-receivership GST returns; Receive correspondence regarding the status of the ATB requests;	.20	120.00
27-Apr-2023	SB	Review invoices for payment; Correspondence with Embark Landscape & Design Inc. regarding the discontinuation of services at Jasper Ave;	.30	96.00
27-Apr-2023	IS	Post disbursement to Ascend. Prepare a cheque for the same; Arrange to mail;	.20	41.00

28-Apr-2023	KG	Call with Ryan Trainer of McLennan Ross regarding the property taxes on Jasper Ave; Review property tax certificate;	.20	120.00
<b>TOTAL</b>			<b>39.10</b>	<b>13,766.80</b>

**INVOICE SUMMARY**

PROFESSIONAL FEES		\$13,766.80
GST on Professional Fees	<u>688.34</u>	688.34
<b>TOTAL THIS INVOICE</b>		<u><b>\$14,455.14</b></u>

The time incurred by members of the staff of MNP Ltd. on this assignment regarding the Companies for the period April 1, 2023 to April 30, 2023, was as follows:

**FEE SUMMARY**

<b>Staff</b>	<b>Position</b>	<b>Hours</b>	<b>Hourly Rate \$</b>	<b>Total \$</b>
Kristin Gray	Senior Vice President	8.00	600.00	4,800.00
Steven Barlott	Senior Consultant	22.50	320.00	7,200.00
Comfort Uche	Analyst	0.40	231.00	92.40
Isobel Smith	Administration	8.10	205.00	1,660.50
Megan Schafer	Administration	0.10	139.00	13.90
<b>Time Billed</b>		<u><b>39.10</b></u>	<u><b>352.09 *</b></u>	<u><b>13,766.80</b></u>

(\*Average)



June 20, 2023

Mike Priestner Real Estate Inc. and  
MPRE GP Dev Inc.  
10220 – 184 Street NW  
Edmonton, AB T5S 0B9

**Attention: Kyle Runzer**

**Re: In the Matter of the Receivership of 2399430 Alberta Ltd and 2399449 Alberta Ltd. (the  
"Companies")**

**Client Number: 982968**

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Please find enclosed our Invoice No. 11098774 for professional services rendered for the period of May 1, 2023, to May 31, 2023, which we trust you will find in order.

If you have any questions, please don't hesitate to contact us.

Yours very truly,

**MNP Ltd.**

**Receiver of 2399430 Alberta Ltd. and 2399449 Alberta Ltd.**

Per:

  
Kristin Gray, CPA, CA, CIRP, LIT

Enclosure



**INSOLVENCY & RESTRUCTURING PROFESSIONALS**  
SUITE 1300, MNP TOWER, 10235 - 101 STREET NW, EDMONTON AB, T5J 3G1  
1.866.465.1155 T: 780.455.1155 F: 780.409.5415 MNPdebt.ca

June 20, 2023

Invoice No: 11098774  
GST No: 10369 7215

Mike Priestner Real Estate Inc. and  
MPRE GP Dev Inc.  
10220 – 184 Street NW  
Edmonton, AB T5S 0B9

**Attention: Kyle Runzer**

**Re: In the Matter of the Receivership of 2399430 Alberta Ltd and 2399449 Alberta Ltd. (the  
"Companies")**  
**Client Number: 982968**

**PROFESSIONAL SERVICES RENDERED** by members of the staff of MNP Ltd., as Receiver of the Companies, for the period May 1, 2023, to May 31, 2023, including inter alia the following:

<b>DATE</b>	<b>STAFF</b>	<b>DESCRIPTION</b>	<b>TIME</b>	<b>FEE</b>
01-May-2023	SB	Review invoices for payment; Insurance inspection at 10053 Jasper Ave ("Jasper Ave");	1.50	480.00
01-May-2023	KG	Prepare for and attend the Sale and Vesting Order ("SAVO") application; Various correspondence with Ryan Trainer of McLennan Ross LLP ("McLennan Ross") regarding the Letter of Intent ("LOI") received from a related Company and the request for an adjournment; Review LOI; Review and approve invoices for payment; Correspondence to Steven Barlott to prepare a utility and contractor transfer summary; Update from NAI Commercial ("NAI") on marketing efforts and the timeline for formal reporting;	1.50	900.00
02-May-2023	MS	Post funds received to Ascend. Deposit the same with the bank;	.10	23.20
02-May-2023	SB	Correspondence with Ken Muggeridge of the YMCA regarding maintenance items and the requirement for waste bins to be emptied, correspondence with an electrician regarding maintenance items; Review utility invoices for payment;	.50	160.00



02-May-2023	IS	Post disbursements to Ascend. Prepare cheques for the same; Arrange mailing;	.40	82.00
08-May-2023	SB	Insurance inspection at the Jasper Ave Property;	1.50	480.00
08-May-2023	IS	Post website update;	.30	61.50
08-May-2023	KG	Website update; Review SAVO; Review and approve invoices for payment; Receive marketing updates from NAI; Email correspondence to the lender regarding price reduction recommendations;	.60	360.00
09-May-2023	IS	Post disbursements to Ascend. Prepare cheques for the same; Arrange mailing;	1.00	205.00
10-May-2023	CU	Prepare bank reconciliations for the month of April 2023;	.40	92.40
10-May-2023	IS	Prepare and edit miscellaneous correspondence;	1.50	307.50
11-May-2023	SB	Correspondence with Goodbye Graffiti Inc. regarding outstanding invoices; Various correspondence;	.50	160.00
15-May-2023	SB	Insurance inspection at the Jasper Ave Property; Review invoices for payment;	1.50	480.00
15-May-2023	KG	Follow up with Henok Kassaye of the Company regarding the outstanding items, motorbike, and payment of rent;	.20	120.00
17-May-2023	IS	Various estate banking tasks; Post funds received to Ascend;	.30	61.50
17-May-2023	KG	Review and approve invoices for payment; Edit and finalize various correspondence;	.20	120.00
18-May-2023	IS	Edit and finalize miscellaneous correspondence; Post disbursements to Ascend. Prepare cheques for the same; Arrange to mail;	.60	123.00
18-May-2023	KG	Call with the lender regarding listing prices, marketing relaunch, and interim distribution. Correspondence with Ryan Trainer of McLennan Ross regarding the same; Consider examination strategy; Sign disbursement cheques;	.50	300.00

19-May-2023	SB	Insurance inspection at the Jasper Ave Property;	1.50	480.00
25-May-2023	IS	Post disbursement to Ascend. Prepare cheque for the same; Arrange to mail;	.20	41.00
25-May-2023	KG	Review and execute Undertaking to Readjust and Bring Down Certificate in respect of Jasper Ave closings;	.20	120.00
26-May-2023	IS	Various correspondence with Steven Barlott; Pull corporate and PPR searches for a related company;	.30	61.50
26-May-2023	KG	Follow up with Mandi-Deren Dube of MLT Aikins ("MLT") regarding the release of the motorbike; Review utility summary to send to the purchaser on Jasper Ave; Correspondence with Richard Tino of Leibel Insurance Group ("Leibel") regarding insurance coverage for Jasper Ave;	.30	180.00
29-May-2023	SB	Insurance inspection at the Jasper Ave Property; Prepare contractor and utility detail listing for the purchaser of Jasper Ave;	2.00	640.00
29-May-2023	KG	Various correspondence regarding the closing of Jasper Ave;	.20	120.00
30-May-2023	SB	Discussions with Kristin Grey regarding the closing of the Jasper Ave Property; Attendance at the Jasper Ave Property and return motorbike key; Coordinate sending keys once the sale has closed; Review invoices for payment; Various correspondence;	1.50	480.00
30-May-2023	KG	Correspondence with Ryan Trainer of McLennan Ross and Richard Tino of Leibel regarding issues with the transfer of policy; Correspondence with NAI regarding courier of keys; Correspondence with Ryan Trainer of McLennan Ross regarding the closing of Jasper Ave and release of the motorbike; Various correspondence with the purchaser and their counsel regarding the transfer of the insurance policy;	.80	480.00

31-May-2023	SB	Correspondence with Impark regarding the cancellation of the Receiver's account and transfer to the purchaser; Correspondence with Ken Mugeridge of the YMCA regarding HVAC and electrical maintenance; Review updated YMCA certificate of insurance; Prepare keys for key release to the purchaser of Jasper Ave; Review utility invoices for payment;	1.20	384.00
31-May-2023	IS	Various correspondence with the CRA regarding account maintenance and the closure of the RT0001 GST account; Send wire transfer instructions to McLennan Ross; Arrange courier for key release to the purchaser;	1.20	246.00
31-May-2023	KG	Various correspondence regarding the purchaser's insurance; Execute cancellation of insurance; Correspondence with Steven Barlott regarding a small toilet leak at the Jasper Ave Property; Confirmation of closing; Execute Receiver Certificate; Review and approve invoices for payment; Review the YMCA insurance certificate; Marketing and interest update call with NAI;	1.00	600.00
<b>TOTAL</b>			<b>23.50</b>	<b>8,348.60</b>

**INVOICE SUMMARY**

PROFESSIONAL FEES		\$8,348.60
GST on Professional Fees	<u>417.43</u>	417.43
<b>TOTAL THIS INVOICE</b>		<u><b>\$8,766.03</b></u>

The time incurred by members of the staff of MNP Ltd. on this assignment regarding the Companies for the period May 1, 2023, to May 31, 2023, was as follows:

**FEE SUMMARY**

<b>Staff</b>	<b>Position</b>	<b>Hours</b>	<b>Hourly Rate \$</b>	<b>Total \$</b>
Kristin Gray	Senior Vice President	5.50	600.00	3,300.00
Steven Barlott	Senior Consultant	11.70	320.00	3,744.00
Comfort Uche	Analyst	0.40	231.00	92.40
Megan Schafer	Administration	0.10	232.00	23.20
Isobel Smith	Administration	5.80	205.00	1,189.00
<b>Time Billed</b>		<u><b>23.50</b></u>	<u><b>355.26 *</b></u>	<u><b>8,348.60</b></u>

(\*Average)



July 10, 2023

Mike Priestner Real Estate Inc. and  
MPRE GP Dev Inc.  
10220 – 184 Street NW  
Edmonton, AB T5S 0B9

**Attention: Kyle Runzer**

**Re: In the Matter of the Receivership of 2399430 Alberta Ltd and 2399449 Alberta Ltd. (the  
"Companies")**  
**Client Number: 982968**

---

Please find enclosed our Invoice No. 11132425 for professional services rendered for the period of June 1, 2023, to June 30, 2023, which we trust you will find in order.

If you have any questions, please don't hesitate to contact us.

Yours very truly,

**MNP Ltd.**  
**Receiver of 2399430 Alberta Ltd. and 2399449 Alberta Ltd.**

Per:

  
Kristin Gray, CPA, CA, CIRP, LIT  
Enclosure



**INSOLVENCY & RESTRUCTURING PROFESSIONALS**  
SUITE 1300, MNP TOWER, 10235 - 101 STREET NW, EDMONTON AB, T5J 3G1  
1.866.465.1155 T: 780.455.1155 F: 780.409.5415 MNPdebt.ca

July 10, 2023

Invoice No: 11132425  
GST No: 10369 7215

Mike Priestner Real Estate Inc. and  
MPRE GP Dev Inc.  
10220 – 184 Street NW  
Edmonton, AB T5S 0B9

**Attention: Kyle Runzer**

**Re: In the Matter of the Receivership of 2399430 Alberta Ltd and 2399449 Alberta Ltd. (the  
"Companies")  
Client Number: 982968**

**PROFESSIONAL SERVICES RENDERED** by members of the staff of MNP Ltd., as Receiver of the Companies, for the period June 1, 2023, to June 30, 2023, including inter alia the following:

<b>DATE</b>	<b>STAFF</b>	<b>DESCRIPTION</b>	<b>TIME</b>	<b>FEE</b>
01-Jun-2023	SB	Review report from McLennan Ross LLP ("McLennan Ross") regarding the sale of 10053 Jasper Ave ("Jasper Ave"); Prepare a notice of cancellation for the Jasper Ave utilities to EPCOR and Direct Energy;	1.50	525.00
01-Jun-2023	IS	Post disbursements to Ascend. Prepare cheques for the same; Arrange to mail; Various estate banking tasks;	.70	151.20
02-Jun-2023	SB	Review banking transaction details provided by Mandi Deren-Dube of MLT Aikins LLP ("MLT");	.50	175.00
02-Jun-2023	IS	Review of the Statement of Adjustments from McLennan Ross. Send the same to Kristin Gray;	.20	43.20
05-Jun-2023	MS	Deposit funds received;	.10	24.50
05-Jun-2023	IS	Post various funds received to Ascend. Arrange deposit of the same;	.60	129.60
06-Jun-2023	IS	Post disbursement to Ascend. Prepare a cheque for the same; Arrange to mail; Various banking tasks and transfers;	.60	129.60

07-Jun-2023	KG	Call with Ryan Trainer of McLennan Ross regarding an application to distribute funds and the process for the distribution of funds to unsecured creditors; Call with Vince Caputo of NAI Commercial ("NAI") regarding interest in 10315 109 Street NW ("Harvest") Property;	.50	317.50
08-Jun-2023	CU	Prepare bank reconciliation for May 2023;	.40	97.60
08-Jun-2023	SB	Review invoices for payment; Call to EPCOR regarding the cancellation of services at Jasper Ave;	.70	245.00
08-Jun-2023	IS	Various estate administration tasks related to an upcoming application date;	.20	43.20
09-Jun-2023	SB	Review additional transaction details from ATB Financial ("ATB") regarding possible preference payments and update the schedule with the same;	.50	175.00
12-Jun-2023	SB	Discussion with Kirstin Gray regarding possible preference payments and outstanding banking transactions; Review invoices for payment; Various correspondence;	.50	175.00
12-Jun-2023	KG	Review documents from ATB. Give further instructions to Steven Barlott;	.20	127.00
13-Jun-2023	SB	Meet with Allison Lipsett of ATB to obtain details of transactions that are noted as possible preference payments;	2.50	875.00
13-Jun-2023	IS	Post disbursements to Ascend. Prepare cheques for the same; Arrange to mail; Various banking tasks regarding the transfer of funds;	1.50	324.00
14-Jun-2023	SB	Prepare for and meet with Henok Kassaye of the Companies regarding outstanding financial statements and banking transactions;	1.00	350.00
14-Jun-2023	IS	Prepare and edit miscellaneous correspondence;	1.00	216.00
14-Jun-2023	KG	Prepare for and meet with Henok Kassaye of the Companies to discuss and classify all banking transactions; Email correspondence to Henok Kassaye of the Companies regarding bookkeeping;	1.00	635.00
15-Jun-2023	SB	Review miscellaneous correspondence;	.30	105.00

16-Jun-2023	SB	Prepare and submit quarterly GST returns for the Companies;	1.00	350.00
19-Jun-2023	MS	Deposit funds received;	.10	24.50
19-Jun-2023	IS	Post funds received to Ascend; Various estate banking tasks;	.50	108.00
19-Jun-2023	KG	Call with Richard Tino of Leibel Insurance Group ("Leibel") regarding the refund of premiums on the cancelled Jasper Ave policy; Edit and finalize various correspondence;	.30	190.50
20-Jun-2023	SB	Provide instructions to Isobel Smith regarding website update for the sale of the Jasper Ave Property; Various correspondence;	.30	105.00
20-Jun-2023	IS	Edit and finalize various correspondence; Post disbursements to Ascend. Prepare cheques for the same; Review the cheque request process with Liz Zhang; Arrange to mail;	.90	194.40
20-Jun-2023	KG	Call with Vince Caputo of NAI regarding an offer and interest to date on Harvest;	.30	190.50
20-Jun-2023	LZ	Post disbursements to Ascend and give the same to Isobel Smith to review;	.50	108.00
22-Jun-2023	IS	Post disbursements to Ascend. Prepare cheques for the same; Various banking tasks relating to the same; Send miscellaneous correspondence to the Companies;	.50	108.00
22-Jun-2023	KG	Review Harvest offer; Email update to the lender on marketing efforts and offers to date; Follow up with NAI;	.40	254.00
23-Jun-2023	SB	Correspondence with Ken Muggeridge of the YMCA regarding front door issues, and coordinate maintenance of the same; Discussion with Kristin Gray regarding the distribution report details;	.60	210.00
23-Jun-2023	KG	Review GLs and calculate a transfer between the estate trust accounts; Correspondence to Steven Barlott regarding the allocation of professional fees and the distribution report; Review and approve invoices for payment; Follow up on RT0002 GST refunds;	.50	317.50



26-Jun-2023	IS	Post website update; Various estate banking tasks relating to the transfer of trust funds;	1.00	216.00
27-Jun-2023	MS	Deposit funds received;	.10	24.50
27-Jun-2023	IS	Post disbursements to Ascend. Prepare cheques for the same; Arrange to mail;	.30	64.80
27-Jun-2023	KG	Follow up with Leibel on the status of the insurance refund; Review and approve invoices for payment; Review RT0002 Notice of Assessment and give instructions regarding prefilling returns; Call with Ryan Trainer of McLennan Ross regarding the allocation of professional fees;	.30	190.50
28-Jun-2023	SB	Review final banking transaction from ATB and update tracking spreadsheet;	.10	35.00
29-Jun-2023	IS	Post disbursements to Ascend. Prepare cheques for the same; Arrange to mail;	.30	64.80
29-Jun-2023	KG	NAI marketing update call;	.20	127.00
<b>TOTAL</b>			<b>22.70</b>	<b>7,746.40</b>

**INVOICE SUMMARY**

PROFESSIONAL FEES		\$7,746.40
GST on Professional Fees	<u>387.32</u>	387.32
<b>TOTAL THIS INVOICE</b>		<u><b>\$8,133.72</b></u>

The time incurred by members of the staff of MNP Ltd. on this assignment regarding the Companies for the period June 1, 2023, to June 30, 2023, was as follows:

**FEE SUMMARY**

<b>Staff</b>	<b>Position</b>	<b>Hours</b>	<b>Hourly Rate \$</b>	<b>Total \$</b>
Kristin Gray	Senior Vice President	3.70	635.00	2,349.50
Steven Barlott	Senior Consultant	9.50	350.00	3,325.00
Megan Schafer	Senior Administration	0.30	245.00	73.50
Comfort Uche	Analyst	0.40	244.00	97.60
Isobel Smith	Administration	8.30	216.00	1,792.80
Liz Zhang	Administration	0.50	216.00	108.00
<b>Time Billed</b>		<b>22.70</b>	<b>341.25 *</b>	<b>7,746.40</b>

(\*Average)

**EXHIBIT B**

Copies of the Receiver's Legal Counsel Invoices

This is Exhibit " B " referred to  
in the Affidavit of

Kristin Gray

Sworn before me this 17 day

of July, 2023

Isobel Smith

A Commissioner for Oaths in and for Alberta

**ISOBEL NICOLE SMITH**

A Commissioner for Oaths  
in and for Alberta

My Commission expires August 31, 2024  
Appointee No. 0764665

**In the Matter of the Receivership of 2394430 Alberta Ltd. and 2399449 Alberta Ltd.**

**Summary of Receiver's Legal Counsel Fees**

**For the period of March 1, 2023, to June 23, 2023**

<b>Firm</b>	<b>Date</b>	<b>Invoice</b>	<b>Fees</b>	<b>Disbursements</b>	<b>GST</b>	<b>Total</b>
McLennan Ross LLP	April 28, 2023	826833	10,483.00	404.63	544.38	11,432.01
McLennan Ross LLP	June 23, 2023	832717	11,963.50	445.66	614.46	13,023.62
			<b>22,446.50</b>	<b>850.29</b>	<b>1,158.84</b>	<b>24,455.63</b>

# MCLENNAN ROSS

LEGAL COUNSEL

Date: June 23, 2023  
 Client No.: 020993  
 Matter No.: 20230841 RTT  
 Bill No.: 832717

600 McLennan Ross Building  
 12220 Stony Plain Road  
 Edmonton, AB T5N 3Y4

ATTN: KRISTIN GRAY  
 MNP LTD.  
 10235 101 STREET NW  
 SUITE 1300  
 EDMONTON, AV T5J 3G1

Telephone (780) 482-9200  
 Fax (780) 482-9100  
 Toll-Free 1-800-567-9200  
 Enquiries E-mail edmonton@mross.com  
 Payments E-mail payments@mross.com

**RE: RECEIVERSHIP OF 2399490 AB LTD AND 2399449 ALBERTA LTD  
 MASTER FILE**

### SUMMARY OF ATTACHED ACCOUNT

<b>Total fees, other charges, disbursements and tax for professional services rendered, details of which are attached:</b>	
<b>FEES:</b>	<b>\$11,963.50</b>
<b>OTHER CHARGES:</b>	<b>\$210.26</b>
<b>DISBURSEMENTS:</b>	<b>\$235.40</b>
<b>TAX:</b>	<b>\$614.46</b>
<b>TOTAL DUE: (Payable Canadian Funds)</b>	<b>\$13,023.62</b>

**EFT (Electronic Funds Transfer) or Wire Transfer Instructions for Canadian Funds within Canada**

Receiving Bank Canadian Western Bank 100 12230 Jasper Avenue Edmonton, AB T5N 3K3  
 Receiving Account 101010437955  
 Bank ID 030  
 Bank Transit 03029  
 Beneficiary Name McLennan Ross LLP  
 Beneficiary Address 600 McLennan Ross Building 12220 Stony Plain Road Edmonton, AB T5N 3Y4  
 Please email "Matter 20230841 Invoice 832717" to payments@mross.com

**EFT (Electronic Funds Transfer) or Wire Transfer Instructions for payments from outside of Canada**

Receiving Bank Royal Bank of Canada 16909 - 103A Avenue Edmonton AB Canada T5P 4Y5  
 Receiving Account 104-397-5  
 Bank ID 003  
 Bank Transit 01599  
 Beneficiary Name McLennan Ross LLP  
 Swift Code ROYCCAT2  
 Beneficiary Address 600 McLennan Ross Building 12220 Stony Plain Road, Edmonton, AB T5N 3Y4  
 Please email "Matter 20230841 Invoice 832717" to payments@mross.com

**For Interac e-Money transfers**

Please provide the matter number 20230841 bill number 832717 and password by email to payments@mross.com

ALL ACCOUNTS ARE PAYABLE UPON RECEIPT. INTEREST AT THE RATE OF 1.5% PER MONTH (18% PER ANNUM) SHALL BE CHARGED ON ALL ACCOUNTS FROM DATE OF BILLING HOWEVER NO INTEREST WILL BE CHARGED ON ACCOUNTS PAID WITHIN 30 DAYS

*Ken*  
*449 (Rc)*  
*Legal Fees*  
*OK to Pay*

**POSTED**  
**JUN 27 2023**

# MCLENNAN ROSS

LEGAL COUNSEL

Date: June 23, 2023  
 Client No.: 020993  
 Matter No.: 20230841 RTT  
 Bill No.: 832717

600 McLennan Ross Building  
 12220 Stony Plain Road  
 Edmonton, AB T5N 3Y4

ATTN: KRISTIN GRAY  
 MNP LTD.  
 10235 101 STREET NW  
 SUITE 1300  
 EDMONTON, AV T5J 3G1

Telephone (780) 482-9200  
 Fax (780) 482-9100  
 Toll-Free 1-800-567-9200  
 Enquiries E-mail edmonton@mross.com  
 Payments E-mail payments@mross.com

**RE: RECEIVERSHIP OF 2399430 AB LTD. AND 2399449 ALBERTA LTD.  
 MASTER FILE**

PROFESSIONAL SERVICES RENDERED WITH RESPECT TO THE ABOVE NOTED MATTER, INCLUDING

24-Apr-23	RTT	1.00	Review correspondence re EPCOR account; Review correspondence to H. Kassaye; Update service list; Call with Receiver; Correspondence with W. Dushenski re nature of application.	400.00
25-Apr-23	RTT	0.30	Call with Receiver re issues on filing CRA remittances and outstanding ATB documents.	120.00
26-Apr-23	RTT	0.40	Email correspondence with ATB re provision of missing documents; Email, correspondence with counsel for debtor re CRA information.	160.00
28-Apr-23	RTT	0.30	Review and respond to correspondence from City of Edmonton re outstanding taxes; Call with Receiver; Call with offeror on UBI.	120.00
29-Apr-23	RTT	0.40	Prepare speaking notes for application for sale of Union Bank Inn.	160.00
01-May-23	CPR	0.20	Review R. Trainer's email re CA's and disclosure to competitive bids and respond.	135.00
01-May-23	RTT	5.90	Prepare speaking notes for application; Email correspondence with counsel for the purchaser; Attend application to approve sale and vest title.	2,360.00
02-May-23	MVM	0.20	Discussions with L. Roseman and R. Trainer re closing.	65.00
02-May-23	RTT	0.30	Provide direction to M. Marrelli of our office re closing of Union Bank transaction.	120.00
08-May-23	MVM	1.00	Review file and closing materials; Discussions with paralegal and R. Trainer re same; Attend to closing matters.	325.00
08-May-23	RTT	0.10	Review market assessment email re price reductions.	40.00
10-May-23	MVM	1.00	Discussions with paralegal re sale of property; Review of file and discussions re closing.	325.00
10-May-23	TMC	0.10	Confer with M. Marrelli	16.50
16-May-23	RTT	0.20	Review correspondence.	80.00
17-May-23	TMC	2.90	Review of electronic and paper file; Conduct property tax search - Edmonton; Corporate search on purchaser; Prepare Statement of Adjustments, trust letter, GST Indemnity, Letter to Land Titles authorizing registration of Order; Note change of purchaser name; Amend closing documents; Email communications with D. Hawreluk re purchaser's counsel; Finalize trust letter and enclosures;	478.50
18-May-23	TMC	0.40	Amend trust letter re Union Bank sale and forward via courier;	66.00

G.S.T. #R119415172  
 CLIENT COPY

18-May-23	RTT	0.50	Review and approve trust letter; Call with Receiver re next steps in listing property and application for distribution of funds; Diarize application for distribution for June 6.	200.00
18-May-23	MVM	0.70	Review and execution of trust letter re closing; Discussions with R. Trainer re same.	227.50
19-May-23	RTT	0.40	Approve trust letter to counsel for buyer; Call with Receiver.	160.00
19-May-23	JRM	0.20	Discussion and instruction from R. Trainer re application and order preparation.	69.00
24-May-23	RTT	0.30	Call with Receiver re resolving issues with H. Kassaye and dealing with motorcycle.	120.00
25-May-23	MVM	1.30	Review order and discussions with counsel for purchaser re closing; Discussions with paralegal and R. Trainer re same.	422.50
25-May-23	RTT	0.30	Review and respond to correspondence from realtor re presence of motorcycle at UBI; Email receiver re execution of documents; Review closing documents.	120.00
25-May-23	TMC	1.30	Union Bank - Telephone discussion with V. Caputo re closing; Email to R. Trainer re motorcycle issue; Confer with R. Trainer and M. Marrelli; Prepare Undertaking to Readjust and Vendor's Bring Down Certificate; Forward to R. Trainer for execution by client;	214.50
26-May-23	MVM	0.50	Attend to closing matters; Discussions with paralegal re same. Discussions with counsel for purchasers re same.	162.50
26-May-23	TMC	0.20	Union bank building - Telephone discussion with Stephanie at Witten re balance of document deliverables; Forward electronic copies;	33.00
29-May-23	MVM	0.70	Attend to closing matters; Discussions with paralegal re same and re personal property and receivers certificate.	227.50
29-May-23	TMC	1.00	Voice mail message from solicitor for purchaser re discharge of Writ and when we would be providing Bill of Sale and Receiver's Certificate; Email communications with M. Marrelli and R. Trainer re closing documents; Telephone discussion with D. Hiebert re closing matters;	165.00
29-May-23	RTT	0.50	Review correspondence re termination of utility contracts and broker information and send to counsel for purchaser; Follow up with counsel for debtors re status of removal of motorcycle; Address questions from counsel for buyer.	200.00
30-May-23	MVM	1.30	Attend to closing matters; Discussions with paralegal and R. Trainer re same; Review order re free and clear and discussions surrounding registered writ of enforcement.	422.50
30-May-23	TMC	0.10	Union Bank sale - Email to R. Trainer re discharge of writ;	16.50
30-May-23	TMC	0.80	Union Bank - Email with M. Marrelli and R. Trainer re reply to discharge of writ issue; Confer with M. Marrelli and R. Trainer; Prepare draft email re transfer of unencumbered assets; Telephone discussion with solicitor for purchaser re verification of trust account details	132.00
30-May-23	RTT	2.10	Address concerns from buyer re impact of writ against assets; Email counsel for purchaser re delivery of additional keys; Address insurance transfer with receiver and counsel for purchaser; Review form of order and purchase agreement; Address motorcycle issue with counsel for debtors and counsel for purchaser;	840.00
31-May-23	RTT	0.30	Address questions re receiver's certificate; Email counsel for debtor and purchaser re motorcycle.	120.00
31-May-23	MVM	2.50	Attend to closing and post closing matters; Correspondence and discussions with counsel re closing; Discussions with R. Trainer and paralegal re closing. Disbursement of closing funds.	812.50

31-May-23	TMC	3.50	Receipt and administration of cash to close; Amend and forward Receiver's Certificate to client for execution; Receipt and review of filed Receiver's Certificate; Remit for electronic filing; Instruct release of keys; Request wire transfer information from client; Locate and transfer deposit funds to couple with cash to close; Letter to City of Edmonton forwarding payment of outstanding taxes; Letter to NAI Commercial forwarding payment of commission; Instruct courier deliveries as appropriate; Instruct wire transfer of net sale proceeds to client; Prepare Statement of Receipts and Disbursements; Confirm registration of purchaser's GST registration number and obtain verification; Prepare report to client; Compile enclosures;	577.50
01-Jun-23	MVM	0.60	Review and execution of reporting letter to MNP re closing of sale of Union Bank Inn.	195.00
01-Jun-23	TMC	1.30	Union Bank - Receipt and review of rejected receiver's certificate; Amend court file number and resubmit for filing; Email from and to solicitor for purchaser; Receipt and review of filed Receiver's Certificate and forward to solicitor for purchaser	214.50
02-Jun-23	TMC	0.10	Union Bank sale - Receipt and review of Conduct property tax search receipt for payment of 2022 arrears; Complete electronic record; Forward to solicitor for purchaser;	16.50
02-Jun-23	RTT	0.10	Review reporting package on UBI closing.	40.00
04-Jun-23	RTT	0.10	Review correspondence re further efforts to question H. Kassaye and obtaining records from ATB.	40.00
05-Jun-23	RTT	0.10	Review correspondence re meeting with H. Kassaye.	40.00
07-Jun-23	RTT	0.80	Call with Receiver; Draft email to ATB re delivery of cheques; Draft email to ATB re delivery of missing items; Check dates on commercial list and canvass availability; Email court coordinator to schedule application; Strategy email to C. Russell of our office re personal property proceeds.	320.00
08-Jun-23	JRM	0.20	Discussion and instruction from R. Trainer re application.	69.00
08-Jun-23	CPR	0.10	Review and reply re chattels.	67.50
08-Jun-23	RTT	0.20	Give direction to J. McTague re preparation of application.	80.00
09-Jun-23	RTT	0.30	Review email from court confirming reservation of time for application for distribution; Draft booking letter.	120.00
12-Jun-23	CPR	0.10	Review emails re chattels and respond.	67.50
12-Jun-23	RTT	0.50	Call with Gala Construction re status of their liens as a result of the sale; Execute booking letter.	200.00
14-Jun-23	RTT	0.20	Review booking confirmation and forward to Receiver; Review correspondence re follow up email to H. Kassaye.	80.00
15-Jun-23	RTT	0.40	Call with Receiver re interview with H. Kassaye and shifting hold over accounts to bankruptcy from trustee.	160.00
19-Jun-23	RTT	0.10	Review correspondence to ATB re deposit issue.	40.00

**SUMMARIES**

	TITLE	\$ RATE	HOURS	\$ FEES
CPR	CHARLES P. RUSSELL, K.C.	675.00	0.40	270.00
JRM	JAMES MCTAGUE	345.00	0.40	138.00
MVM	MARCO V. MARRELLI	325.00	9.80	3,185.00
RTT	RYAN TRAINER	400.00	16.10	6,440.00
TMC	TERRY CSANDL	165.00	11.70	1,930.50

**FEES FOR PROFESSIONAL SERVICES:**

**\$11,963.50**

**OTHER CHARGES:**

Laser printing 192.00

**G.S.T. #R119415172  
 CLIENT COPY**



Supplies - Tabs	2.76	
Runner Costs	10.00	
Photocopies	5.50	
Total Taxable Other Charges subject to GST:	<u>210.26</u>	
TOTAL OTHER CHARGES:		210.26
TOTAL FEES AND OTHER CHARGES:		<u>12,173.76</u>
NON-TAXABLE DISBURSEMENTS: (Incurred on your behalf as agent)		
Court House - Filing	70.00	
Filing Fee - Application	50.00	
TOTAL NON-TAXABLE DISBURSEMENTS:		120.00
TAXABLE DISBURSEMENTS:		
CWB Visa - Edm - Gord - Court of King's Bench	10.00	
Digital Printing fee		
CWB Visa - Edm - Gord - Court of King's Bench	2.00	
Digital Printing fee		
Corporate Registry - Search	14.00	
Deliveries	36.40	
Bank Outgoing Wire Fee	35.00	
City on-line (Edmonton)	18.00	
Total Taxable Disbursements subject to GST:	<u>115.40</u>	
TOTAL TAXABLE DISBURSEMENTS:		115.40
TOTAL DISBURSEMENTS:		<u>235.40</u>
SUBTOTAL:		\$12,409.16
TOTAL GST/HST:		614.46
TOTAL ACCOUNT INCLUDING GST/HST PAYABLE: (Payable Canadian Funds)		<u>\$13,023.62</u>

THIS IS OUR ACCOUNT HEREIN

McLENNAN ROSS LLP

PER: Ryan Trainer  
RYAN TRAINER

E. & O.E.

Blank tax code = 5% GST  
F12/D12 tax code = 12% HST  
F13/D13 tax code = 13% HST  
F14/D14 tax code = 14% HST  
F15/D15 tax code = 15% HST

G.S.T. #R119415172  
CLIENT COPY

# MCLENNAN ROSS

LEGAL COUNSEL

Date: April 28, 2023  
 Client No.: 020993  
 Matter No.: 20230841 RTT  
 Bill No.: 826833

600 McLennan Ross Building  
 12220 Stony Plain Road  
 Edmonton, AB T5N 3Y4

ATTN: KRISTIN GRAY  
 MNP LTD.  
 10235 101 STREET NW  
 SUITE 1300  
 EDMONTON, AV T5J 3G1

Telephone (780) 482-9200  
 Fax (780) 482-9100  
 Toll-Free 1-800-567-9200  
 Enquiries E-mail edmonton@mross.com  
 Payments E-mail payments@mross.com

**RE: RECEIVERSHIP OF 2399430 AB LTD. AND 2399449 ALBERTA LTD. MASTER FILE**

### SUMMARY OF ATTACHED ACCOUNT

Total fees, other charges, disbursements and tax for professional services rendered, details of which are attached.

FEES:	\$10,483.00
OTHER CHARGES:	\$336.83
DISBURSEMENTS:	\$67.80
TAX:	\$544.38
<b>TOTAL DUE: (Payable Canadian Funds)</b>	<b>\$11,432.01</b>

**EFT (Electronic Funds Transfer) or Wire Transfer instructions for Canadian Funds within Canada**

Receiving Bank: Canadian Western Bank, 100 12230 Jasper Avenue, Edmonton, AB T5N 3K3  
 Receiving Account: 101010437955  
 Bank ID: 030  
 Bank Transit: 03029  
 Beneficiary Name: McLennan Ross LLP  
 Beneficiary Address: 600 McLennan Ross Building, 12220 Stony Plain Road, Edmonton, AB T5N 3Y4  
 Please email "Matter: 20230841; Invoice: 826833" to payments@mross.com

**EFT (Electronic Funds Transfer) or Wire Transfer instructions for payments from outside of Canada**

Receiving Bank: Royal Bank of Canada, 16909 - 103A Avenue, Edmonton, AB Canada T5P 4Y5  
 Receiving Account: 104-397-5  
 Bank ID: 003  
 Bank Transit: 01599  
 Beneficiary Name: McLennan Ross LLP  
 Swift Code: ROYCCAT2  
 Beneficiary Address: 600 McLennan Ross Building, 12220 Stony Plain Road, Edmonton, AB T5N 3Y4  
 Please email "Matter: 20230841; Invoice: 826833" to payments@mross.com

**For Interac e-Money transfers**

Please provide the matter number: 20230841; bill number: 826833 and password by email to payments@mross.com

ALL ACCOUNTS ARE PAYABLE UPON RECEIPT. INTEREST AT THE RATE OF 1.5% PER MONTH (18% PER ANNUM) SHALL BE CHARGED ON ALL ACCOUNTS FROM DATE OF BILLING. HOWEVER, NO INTEREST WILL BE CHARGED ON ACCOUNTS PAID WITHIN 30 DAYS.

*2399449 AB Ltd. (R)  
 Legal fees*

*\$11,432.01  
 sl'*

**POSTED**  
*May 9/23*

# MCLENNAN ROSS

LEGAL COUNSEL

Date: April 28, 2023  
 Client No.: 020993  
 Matter No.: 20230841 RTT  
 Bill No.: 826833

600 McLennan Ross Building  
 12220 Stony Plain Road  
 Edmonton, AB T5N 3Y4

ATTN: KRISTIN GRAY  
 MNP LTD.  
 10235 101 STREET NW  
 SUITE 1300  
 EDMONTON, AV T5J 3G1

Telephone (780) 482-9200  
 Fax (780) 482-9100  
 Toll-Free 1-800-567-9200  
 Enquiries E-mail edmonton@mross.com  
 Payments E-mail payments@mross.com

**RE: RECEIVERSHIP OF 2399430 AB LTD. AND 2399449 ALBERTA LTD.  
 MASTER FILE**

PROFESSIONAL SERVICES RENDERED WITH RESPECT TO THE ABOVE NOTED MATTER, INCLUDING

13-Mar-23	RTT	1.60	Call with counsel for offeror; Update clients; Send historical searches to counsel for offeror; Email counsel for lender re removal of registrations; Address issues with offer.	640.00
14-Mar-23	RTT	1.90	Call with counsel for offeror; Update clients; Send historical searches to counsel for offeror; Email counsel for lender re removal of registrations; Strategy re dealing with issues selling property.	760.00
15-Mar-23	CPR	0.10	Telephone call with R. Trainer re offer on Union Bank.	67.50
15-Mar-23	RTT	2.00	Update Sask Drive OTP with attachments; Email ATB re provision of requested accounts and information; Review Union Bank OTP and provide comments to Receiver; Correspondence with counsel for debtors.	800.00
16-Mar-23	CPR	0.10	Review R. Trainer's email on conflict and respond.	67.50
16-Mar-23	RTT	1.30	Address conflict issue with purchaser on Union Bank offer; Call with broker; Edit Union Bank offer.	520.00
17-Mar-23	RTT	0.20	Email correspondence confirming UBI offer good to sign, and updates included.	80.00
21-Mar-23	RTT	0.70	Review correspondence re ATB records; Review UBI counteroffer against Receiver's offer.	280.00
22-Mar-23	RTT	0.40	Call with Receiver; Update counter offer.	160.00
23-Mar-23	CPR	0.10	Telephone call with R. Trainer.	67.50
23-Mar-23	RTT	1.00	Review new offer; Email correspondence with realtor and Receiver; Conference call with lender.	400.00
27-Mar-23	RTT	0.40	Review correspondence re efforts by Turnip Homes to lease space; Call with Receiver; Direct amendment to offer; Call with Receiver re new offer.	160.00
27-Mar-23	RTT	0.80	Review correspondence re efforts by Turnip Homes to lease space; Call with Receiver; Direct amendment to offer; Call with Receiver re new offer.	320.00
28-Mar-23	RTT	0.90	Request PPR search on motorcycle; Respond to queries re form of order; Review correspondence re unconditional offer; Request call with lender's counsel.	360.00
29-Mar-23	RTT	1.70	Call with Receiver and lender's counsel; Discussions with realtor; Prepare counteroffer.	680.00
29-Mar-23	CPR	0.20	Review and reply to R. Trainer re new Offer.	135.00

02-Apr-23	RTT	2.10	Review commercial list; Confirm possible dates for application; Prepare booking letter; Start drafting application materials and brief.	840.00
03-Apr-23	RTT	0.70	Correspondence with lender's counsel; Email court coordinator to secure time to book application; Prepare service letters; Email correspondence with ATB; Email counsel for Debtor re motorcycle left at Union Bank; Review correspondence re non-waiver for Sask Drive property; Call with Receiver.	280.00
04-Apr-23	CPR	0.10	Review email re return of deposit and respond.	67.50
04-Apr-23	RTT	1.30	Direct return of deposit to offeror on Sask Drive; Edit application materials; Call with Receiver re counter offer.	520.00
05-Apr-23	RTT	0.40	Review proposed amendment document to Sask Drive offer; Email correspondence with client.	160.00
07-Apr-23	RTT	0.10	Review correspondence re request for update from lender.	40.00
10-Apr-23	MVM	0.40	Review agreement and letter from realtors re amendments re same; Discussions with R. Trainer re same.	130.00
10-Apr-23	CPR	0.20	Review amended offer and provide comments.	135.00
10-Apr-23	RTT	1.30	Further edits to application materials; Review correspondence re deposits; Prepare amendment to offer on Sask Drive; Review correspondence with Receiver and debtor; Send follow up email to ATB; Send follow up email to counsel for debtors re motorcycle left on Union Bank property.	520.00
11-Apr-23	WBS	0.30	Discussion with R. Trainer regarding GST Indemnity Tax Certificate; Provide R. Trainer with blank GST Indemnity Tax Certificate.	40.50
11-Apr-23	RTT	1.00	Email correspondence with broker and client re GST indemnity certificate; Review correspondence re counteroffer on Sask Drive; Draft response to M. Duren-Dube re outstanding items.	400.00
12-Apr-23	RTT	0.50	Review amended offer; Forward offer to counsel for lender and seek instructions; Call with Broker; Review further correspondence; Address motorcycle request with broker.	200.00
13-Apr-23	RTT	0.20	Review correspondence re extension of counteroffer on Sask Drive.	80.00
14-Apr-23	RTT	0.20	Review UBI marketing report.	80.00
14-Apr-23	RTT	0.20	Call with broker re offers on Sask Drive.	80.00
17-Apr-23	RTT	0.20	Review correspondence re failure to waive conditions on Sask Drive; Direct return of deposit.	80.00
18-Apr-23	RTT	0.10	Review correspondence.	40.00
19-Apr-23	LNA	0.10	Obtain updated Land Title Certificate of Union Bank property.	12.50
21-Apr-23	RTT	1.40	Edit application materials and Receiver's Second Report to the Court.	560.00
23-Apr-23	RTT	1.80	Finalize application materials; Email correspondence with Receiver re EPCOR; Submit Notice to Media of Application to Restrict Access.	720.00

**SUMMARIES**

		TITLE	\$ RATE	HOURS	\$ FEES
CPR	CHARLES P. RUSSELL, K.C.	Partner	675.00	0.80	540.00
LNA	LYNAE ANDERSON	Paralegal	125.00	0.10	12.50
MVM	MARCO V. MARRELLI	Associate	325.00	0.40	130.00
RTT	RYAN TRAINER	Partner	400.00	24.40	9,760.00
WBS	WHITNEY SMITH	Paralegal	135.00	0.30	40.50

**FEES FOR PROFESSIONAL SERVICES:**

\$10,483.00

**OTHER CHARGES:**

Laser printing	214.75
Colour Reprographic Services	21.20
Scanning of Documents	9.00

Photocopies	59.00	
Runner Costs	10.00	
Supplies - Tabs	22.88	
Total Taxable Other Charges subject to GST:	<u>336.83</u>	
TOTAL OTHER CHARGES:		336.83
TOTAL FEES AND OTHER CHARGES:		<u>10,819.83</u>
TAXABLE DISBURSEMENTS:		
Deliveries	23.80	
Corporate Registry - Search	14.00	
LTO - On Line Title/Document Search	30.00	
Total Taxable Disbursements subject to GST:	<u>67.80</u>	
TOTAL TAXABLE DISBURSEMENTS:		67.80
TOTAL DISBURSEMENTS:		<u>67.80</u>
SUBTOTAL:		<u>\$10,887.63</u>
TOTAL GST/HST:		544.38
TOTAL ACCOUNT INCLUDING GST/HST PAYABLE: (Payable Canadian Funds)		<u>\$11,432.01</u>

THIS IS OUR ACCOUNT HEREIN

McLENNAN ROSS LLP

PER: Ryan Trainer  
RYAN TRAINER

E. & O.E.

Blank tax code = 5% GST  
F12/D12 tax code = 12% HST  
F13/D13 tax code = 13% HST  
F14/D14 tax code = 14% HST  
F15/D15 tax code = 15% HST