

Our File Reference: 20225092

February 13, 2023

**Ryan Trainer**  
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*PLEASE REPLY TO EDMONTON OFFICE  
SENT BY E-MAIL*

**TO THE SERVICE LIST AS ATTACHED**

Dear Sirs and Mesdames:

Re: **In the Matter of the Receivership of 2399430 Alberta Ltd. and 2399449 Alberta Ltd.; Court File No. 2203 19336**

We are counsel to MNP Ltd. in its capacity as the Court-Appointed Receiver (the “**Receiver**”) of 2399430 Alberta Ltd. and 2399449 Alberta Ltd. (collectively, the “**Debtors**”).

In the anticipation of the Application to be heard at 2:00 p.m. on February 21, 2023, before the Honourable Mr. Justice G. S. Dunlop, we enclose herewith the following:

- Application;
- First Report to the Court of the Receiver dated February 10, 2023;
- Proposed form of Order; and
- Bench Brief.

Application materials have been sent for filing and we will provide proof of filings once received from the Court.

Kindly advise us whether you intend to attend the February 21, 2023 Webex Application so that we can advise the Court accordingly. Attached hereto is a copy of the Webex access

**Edmonton**

600 McLennan Ross Building  
12220 Stony Plain Road  
Edmonton, AB T5N 3Y4  
Telephone 780 482 9200  
Facsimile 780 482 9100  
Toll-free 800 567 9200

**Calgary**

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600 – 3<sup>rd</sup> Avenue SW  
Calgary, AB T2P 0G5  
Telephone 403 543 9120  
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Toll-free 888 543 9120

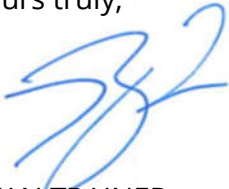
**Yellowknife**

301 Nunasi Building  
5109 – 48<sup>th</sup> Street  
Yellowknife, NT X1A 1N5  
Telephone 867 766 7677  
Facsimile 867 766 7678  
Toll-free 888 836 6684

information. Note, responding materials are to be filed and served by noon on February 16, 2023.

We trust this is in order.

Yours truly,

A handwritten signature in blue ink, appearing to be 'RT', is positioned above the name 'RYAN TRAINER'.

RYAN TRAINER

RTT/Ina

cc: Kristin Gray - MNP Ltd.

20225092 - 4138-9677-2165 v.1

**IN THE MATTER OF THE RECEIVERSHIP OF  
2399430 ALBERTA LTD and 2399449 ALBERTA LTD.**

**SERVICE LIST**  
**(Updated on February 10, 2023)**

<b>NAME, ADDRESS, EMAIL ADDRESS, TELEPHONE AND FAX NUMBER</b>	<b>COUNSEL FOR (OR ON BEHALF OF)</b>
<b>MNP Ltd.</b> Receiver 10235 101 St NW, Suite 1300 Edmonton, AB T5J 0A1  Email: <a href="mailto:Kristin.Gray@mnp.ca">Kristin.Gray@mnp.ca</a>	<b>MNP Ltd.</b>
<b>Dentons Canada LLP</b> 2500 Stantec Tower, 10220 - 103 Avenue NW Edmonton, AB T5J 0K4 Canada  Email: <a href="mailto:nicholas.williams@dentons.com">nicholas.williams@dentons.com</a>	<b>Mike Priestner Real Estate Inc. and MPRE GP Dev Inc.</b>
<b>MCLENNAN ROSS LLP</b> 600 McLennan Ross Building 12220 Stony Plain Road Edmonton, AB T5N 3Y4  Email: <a href="mailto:ryan.trainer@mross.com">ryan.trainer@mross.com</a>	<b>MNP Ltd.</b>
<b>MLT Aikins LLP</b> 10235 101 St NW Suite 2200 Edmonton, AB T5J 3G1  Email: <a href="mailto:mderendube@mltaikins.com">mderendube@mltaikins.com</a>	<b>2399430 Alberta Ltd., 2399449 Alberta Ltd., Turnip Homes Inc., Henok Kassaye</b>
<b>Receiver General of Canada</b> c/o Pacific Insolvency Intake Centre 9755 King George Boulevard Surrey, BC V3T 5E1  Email: <a href="mailto:george.body@justice.gc.ca">george.body@justice.gc.ca</a>	<b>George Body</b>
<b>BLAKELY &amp; DUSHENSKI</b> #201, 10225 - 100 AVENUE EDMONTON, AB T5J0A1  Email: <a href="mailto:bdushenski@bdcounsel.ca">bdushenski@bdcounsel.ca</a>	<b>Bretton Whervin, Anthony Colon, and Nikitas Christodoulakis</b>

<p><b>Korr Design Inc.</b>  101, 1807-22nd Avenue SW  Calgary, AB T2T 0S1  Email: <a href="mailto:kasey@korrdesigninc.com">kasey@korrdesigninc.com</a></p>	
<p><b>Gala Construction Ltd.</b>  7920 119 Street NW  Edmonton, AB T6E 2E5</p>	
<p><b>Muve Realty</b>  Attn: John Rota  Royal LePage ArTeam Realty  #203, 14101 West Block Drive NW  Edmonton, AB T5N 1L5  Email: <a href="mailto:john@muveteam.com">john@muveteam.com</a></p>	
<p><b>1856121 Alberta Ltd.</b>  100-17420 Stony Plain RD NW  Edmonton, AB T5S 1K6</p>	
<p><b>YMCA of Northern Alberta</b>  Association Services   Bill Rees YMCA  10315 109 Street, Edmonton AB T5J 1N3  Ruth Menegozzo, CPA, CA  Email: <a href="mailto:ruth.menegozzo@ymcanab.ca">ruth.menegozzo@ymcanab.ca</a>  Ken Muggeridge  Email: <a href="mailto:Ken.Muggeridge@ymcanab.ca">Ken.Muggeridge@ymcanab.ca</a></p>	

Our File Reference: 20225092

February 13, 2023

Court of King's Bench of Alberta  
Law Courts Building  
1A Sir Winston Churchill Square  
Edmonton, AB T5J 0R2

Attention: Commercial Coordinator

Dear Sir:

Re: **In the Matter of the Receivership of 2399430 Alberta Ltd. and 2399449 Alberta Ltd.; Court File No. 2203 19336**

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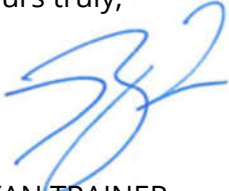
Fax 780.733.9716

*PLEASE REPLY TO EDMONTON OFFICE  
SENT BY E-MAIL*

Please note that we have submitted the Application materials for filing today. We would kindly ask that these materials be forwarded to the Honourable Mr. Justice G.S. Dunlop so that the Justice may have sufficient time to review them in advance to the February 21, 2023 Application.

We trust this is in order.

Yours truly,

A handwritten signature in blue ink, appearing to be 'RTT', is positioned above the name 'RYAN TRAINER'.

RYAN TRAINER

RTT/Ina  
cc: Service List