

February 14, 2023

Notice to Creditors

Re: Faissal Mouhamad Professional Corporation, 985842 Alberta Ltd., 52 Dental Corporation, Delta Dental Corp. and Michael Dave Management Ltd. (collectively the “Debtors”)

As you are likely aware, MNP Ltd. is the Court-appointed Receiver of the Debtors.

Pursuant to an Order granted by the Court of King’s Bench of Alberta on February 14, 2023 (the “Claims Process Order”), a claim process (the “Claims Process”) was approved that authorized and directed the Receiver to solicit claims from all creditors of the Debtors for the purpose of determining the claims that will participate in and be eligible to share in any distribution(s) made in the receivership proceedings (the “Claims Process”). A copy of the Claims Process Order is available on the Receiver’s website at:

<https://mnpdebt.ca/en/corporate/corporate-engagements/fmpc>.

Attached are the following documents with respect to your claim in the Claims Process:

1. A notice to creditors regarding the Claims Process; and
2. A proof of claim form, including instructions.

All claims must be sent by courier or regular mail to MNP Ltd., 1500, 640 – 5th Avenue SW, Calgary, AB T2P 3G4 or via email at Temitope.Muraina@mnp.ca to the attention of Temitope Muraina on or before 5:00 p.m. Mountain Time on Monday, April 10, 2023 (the “Claims Bar Date”). Creditors who do not submit a claim to the Receiver by the specified time on the Claims Bar Date, or such later date as the Court may order, shall:

1. Not be entitled to receive any further notice of the receivership proceedings;
2. Not be entitled to receive any distribution in the receivership proceedings; and
3. Be forever barred from making or enforcing any claim against any Debtor.

Should you have any questions, please contact Temitope Muraina at 1-403-537-8393

Yours truly,

MNP Ltd., in its capacity as Receiver of Faissal
Mouhamad Professional Corporation o/a Delta
Dental, 985842 Alberta Ltd., 52 Dental
Corporation, Delta Dental Corp. and Michael
Dave Management Ltd.



Vanessa Allen, B. Comm, CIRP, LIT
Senior Vice President

COURT FILE NO. 2203-12557

Clerk's Stamp

COURT COURT OF KING'S BENCH OF
ALBERTA

IN BANKRUPTCY AND INSOLVENCY

JUDICIAL CENTRE EDMONTON

PLAINTIFF ROYAL BANK OF CANADA

DEFENDANTS FAISSAL MOUHAMAD PROFESSIONAL CORPORATION, MCIVOR
DEVELOPMENTS LTD., 985842 ALBERTA LTD., 52 DENTAL
CORPORATION, DELTA DENTAL CORP., 52 WELLNESS CENTRE INC.,
PARADISE MCIVOR DEVELOPMENT LTD., MICHAEL DAVE
MANAGEMENT LTD., FAISSAL MOUHAMAD AND FETOUN AHMAD
also known as FETOUN AHMED

DOCUMENT NOTICE OF CLAIMS PROCESS IN THE MATTER OF THE
RECEIVERSHIPS OF FAISSAL MOUHAMAD PROFESSIONAL
CORPORATION, 985842 ALBERTA LTD., 52 DENTAL CORPORATION,
DELTA DENTAL CORP. AND MICHAEL DAVE MANAGEMENT LTD.

1. As you are likely aware, MNP Ltd. acts as Receiver and Manager (the "Receiver") of the assets, undertakings, and properties of Faissal Mouhamad Professional Corporation o/a Delta Dental, 985842 Alberta Ltd., 52 Dental Corporation, Delta Dental Corp. and Michael Dave Management Ltd. (the "Debtors").
2. Pursuant an Order granted by the Court of King's Bench of Alberta on February 14, 2023 (the "Claims Process Order"), a claims process (the "Claims Process") was approved that authorized and directed the Receiver to solicit claims from all creditors of the Debtors for the purpose of determining the claims that will be eligible to share in any distribution(s) made in the receivership proceedings. A copy of the Claims Process Order is available on the Receiver's website at <https://mnpdebt.ca/en/corporate/corporate-engagements/fmpc> (the "Receiver's Website").
3. Any creditor having a claim against any one or more of the Debtors at the Filing Date (as defined in the Claims Process) of any nature whatsoever, including an unsecured, secured, contingent or unliquidated claim (a "Claim") is required to file, in the manner set out in the Claims Process, a proof of claim in the prescribed form (which has been provided to you with this Claims Notice) with the Receiver in order to participate in any distribution in the receivership proceedings.

4. Additional copies of the prescribed proof of claim form can be obtained by contacting the Receiver via telephone at 403-537-8393 or via email at Temitope.Muraina@mnp.ca or it can be downloaded from the Receiver's Website.
5. Any creditor who chooses to file a proof of claim is required to provide whatever documentation it may have to support its Claim, such as contracts, invoices, bills of lading, shipping receipts, security of other agreements and proof of relevant security registrations, in relation to the goods and/or services provided or funds advanced to the Debtors, with all amounts being presented in the appropriate currency under which its Claim arose (the "Claim Support").
6. Any creditor that asserts that it has a secured Claim must append to its proof of claim an affidavit a sworn or solemn declaration affirmed (a "Secured Claim Affidavit") by an individual representative of the creditor asserting the Claim setting out the basis for the Claim and full particulars of the security granted therefore, including the date on, and the manner in, which the security was given, the date on which the security was perfected, all facts relevant to the priority of the security and the value at which the Person assesses the security.
7. All proofs of claim, together with supporting documentation Claim Support and Secured Claim Affidavits, must be delivered by mail or courier service to MNP Ltd., 1500, 640 – 5th Avenue SW, Calgary, AB T2P 3G4 or via email at Temitope.Muraina@mnp.ca to the attention of Temitope Muraina on or before 4:00 p.m. Mountain Time on Monday, April 10, 2023 (the "Claims Bar Date").
8. Creditors that do not submit a proof of claim to the Receiver by the specified time on the Claims Bar Date, or such later date as the Court may order, shall not be entitled to receive any further notice of the receivership proceedings, shall not be entitled to receive any distribution in the receivership proceedings and shall be forever barred from making or enforcing any Claim against any of the Debtors related to the period prior to the Filing Date.
9. Where a Creditor objects to a Disallowance Notice, the creditor must notify the Receiver of its objection in writing (the "Dispute Notice") by registered mail, courier service or email within 10 days from the date of the Disallowance Notice.

10. A creditor who does not file a Dispute Notice to a Disallowance Notice issued by the Receiver shall, unless otherwise ordered by the Court, be conclusively deemed to have accepted the assessment of its Claim as set out in the Disallowance Notice.

Dated February 14, 2023

MNP Ltd., in its capacity as Receiver of Faissal Mouhamad Professional Corporation o/a Delta Dental, 985842 Alberta Ltd., 52 Dental Corporation, Delta Dental Corp. and Michael Dave Management Ltd.



Per:

Vanessa Allen, B. Comm, CIRP, LIT
Senior Vice President

District of: Alberta
Division No. 01 - Edmonton
Court No. 2203-12557

FORM 31 / 36
Proof of Claim

Select the Debtor Entity:

- Faissal Mouhamad Professional Corporation in the City of Red Deer in the Province of Alberta
- 98542 Alberta Ltd. of the Town of Drayton Valley in the Province of Alberta
- 52 Dental Corporation of the City of Calgary in the Province of Alberta
- Delta Dental Corp. of the City of Red Deer in the Province of Alberta
- Michael Dave Management Ltd. of the City of Red Deer in the Province of Alberta

All notices or correspondence regarding this claim must be forwarded to the following address:

In the matter of the receivership of _____ of the _____ of _____ in and the claim of _____, creditor.

I, _____ (name of creditor or representative of the creditor), of the city of _____ in the province of _____ do hereby certify:

1. That I am a creditor of the above-named debtor (or I am _____ (position/title) of _____, creditor).

2. That I have knowledge of all the circumstances connected with the claim referred to below.

3. That the debtor was, at the Filing Date, and still is, indebted to the creditor in the sum of \$ _____, as specified in the statement of account (or affidavit or solemn declaration) attached and marked Schedule "A", after deducting any counterclaims to which the debtor is entitled. (The attached statement of account or affidavit must specify the vouchers or other evidence in support of the claim.) **Please note that proofs of claim in respect of all secured claims must include a sworn affidavit [or solemn declaration] that includes full particulars of the security claimed, including the date on which the security was given, the date on, and the manner in, which the security was perfected, all facts relevant to the priority of the security and the value at which you assess the security.**

4. (Check and complete appropriate category.)

A. UNSECURED CLAIM OF \$ _____

(other than as a customer contemplated by Section 262 of the Act)

That in respect of this debt, I do not hold any assets of the debtor as security and
(Check appropriate description.)

Regarding the amount of \$ _____, I claim a right to a priority under section 136 of the Act.

Regarding the amount of \$ _____, I do not claim a right to a priority.
(Set out on an attached sheet details to support priority claim.)

B. CLAIM OF LESSOR FOR DISCLAIMER OF A LEASE \$ _____

That I hereby make a claim under subsection 65.2(4) of the Act, particulars of which are as follows:
(Give full particulars of the claim, including the calculations upon which the claim is based.)

C. SECURED CLAIM OF \$ _____

That in respect of this debt, I hold assets of the debtor valued at \$ _____ as security, particulars of which are as follows:
(Give full particulars of the security, including the date on which the security was given and the value at which you assess the security, and attach a copy of the security documents.)

D. CLAIM BY FARMER, FISHERMAN OR AQUACULTURIST OF \$ _____

That I hereby make a claim under subsection 81.2(1) of the Act for the unpaid amount of \$ _____
(Attach a copy of sales agreement and delivery receipts.)

E. CLAIM BY WAGE EARNER OF \$ _____

That I hereby make a claim under subsection 81.3(8) of the Act in the amount of \$ _____,

That I hereby make a claim under subsection 81.4(8) of the Act in the amount of \$ _____,

F. CLAIM BY EMPLOYEE FOR UNPAID AMOUNT REGARDING PENSION PLAN OF \$ _____

That I hereby make a claim under subsection 81.5 of the Act in the amount of \$ _____,

That I hereby make a claim under subsection 81.6 of the Act in the amount of \$ _____,

G. CLAIM AGAINST DIRECTOR \$ _____

(To be completed when a proposal provides for the compromise of claims against directors.)

That I hereby make a claim under subsection 50(13) of the Act, particulars of which are as follows:
(Give full particulars of the claim, including the calculations upon which the claim is based.)

H. CLAIM OF A CUSTOMER OF A BANKRUPT SECURITIES FIRM \$ _____

That I hereby make a claim as a customer for net equity as contemplated by section 262 of the Act, particulars of which are as follows:
(Give full particulars of the claim, including the calculations upon which the claim is based.)

5. That, to the best of my knowledge, I _____ (am/am not) (or the above-named creditor _____ (is/is not)) related to the debtor within the meaning of section 4 of the Act, and _____ (have/has/have not/has not) dealt with the debtor in a non-arm's-length manner.

6. That the following are the payments that I have received from, and the credits that I have allowed to, and the transfers at undervalue within the meaning of subsection 2(1) of the Act that I have been privy to or a party to with the debtor within the three months (or, if the creditor and the debtor are related within the meaning of section 4 of the Act or were not dealing with each other at arm's length, within the 12 months) immediately before the date of the initial bankruptcy event within the meaning of Section 2 of the Act: (Provide details of payments, credits and transfers at undervalue.)

Dated at _____, this _____ day of _____, _____.

Witness

Individual Creditor

Witness

Name of Corporate Creditor

Per _____
Name and Title of Signing Officer

Return To:

Phone Number: _____
Fax Number: _____
E-mail Address: _____

MNP Ltd. - Licensed Insolvency Trustee
Per:

Vanessa Allen - Receiver
1500, 640 - 5 Avenue SW
Calgary AB T2P 3G4
Phone: (403) 263-3385 Fax: (403) 537-8437
E-mail: calgary.insolvency@mnp.ca

NOTE: If an affidavit is attached, it must have been made before a person qualified to take affidavits.

WARNINGS: There are severe penalties for making any false claim, proof, declaration or statement of account.

CHECKLIST FOR PROOFS OF CLAIM

This checklist is provided to assist you in preparing the accompanying proof of claim form in a complete and accurate manner. Please specifically check each requirement.

PROOF OF CLAIM

- ▶ The signature of a witness is required;
- ▶ The claim must be signed personally by the individuals;
- ▶ If the creditor is a corporation, the full and complete legal name of the company or firm must be stated;
- ▶ Give the complete address, including postal code, where all notices or correspondence is to be forwarded, the name of the person to contact, the phone number and fax number.

PARAGRAPH 1

- ▶ Please state your name, city of residence, and if you are completing the declaration for a corporation or another person, your position or title.

PARAGRAPH 3

- ▶ State the amount of your claim;
- ▶ A detailed statement of account must be attached and must show the date, number and amount of all the invoices, charged credits or payments;
- ▶ A statement of account is not complete if it begins with an amount brought forward;
- ▶ The amount of the statement of account must agree with the amount claimed on the proof of claim.

PARAGRAPH 4

- ▶ An ordinary creditor must check subparagraph A. A preferred creditor must set out on an attached schedule the particulars of your priority;
- ▶ A secured creditor must check subparagraph C. those creditors advancing secured claims against personal property will be required to provide documentation in support of their claims, such as contracts, invoices, bills of lading, shipping receipts, security of other agreements and proof of relevant security registrations, in relation to the goods and/or services provided or funds advanced, by way of a sworn affidavit or solemn declaration filed in these proceedings. The sworn affidavit or solemn declaration will also be required to include full particulars of the security, including the date on, and the manner in, which the security was given, the date on which the security was perfected, all facts relevant to the priority of the security and the value at which the creditor assesses the security

PARAGRAPH 5

Strike out "are" or "are not" as applicable to you. You would be considered a related person if:

- ▶ You are related to blood or marriage to the debtor;
- ▶ If the debtor is a corporation and you were a shareholder or if your company was controlled by the same shareholders as the debtor corporation.

PARAGRAPH 6

All creditors must attach a detailed list of all payments or credits received or granted, as follows:

- ▶ Within the 3 months preceding the receivership, if the creditor and the debtor are not related;
- ▶ Within 12 months preceding the receivership, if the creditor and debtor are related.