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| COURT | COURT OF KING'S BENCH OF ALBERTA | |
| JUDICIAL CENTRE | EDMONTON | |
| PLAINTIFF | ROYAL BANK OF CANADA | |
| DEFENDENTS | FAISSAL MOUHAMAD PROFESSIONAL CORPORATION, MCIVOR DEVELOPMENTS LTD., 985842 ALBERTA LTD., 52 DENTAL CORPORATION, DELTA DENTAL CORP., 52 WELLNESS CENTRE INC., PARADISE MCIVOR DEVELOPMENTS LTD., MICHAEL DAVE MANAGEMENT LTD., FAISSAL MOUHAMAD AND FETOUN AHMAD also known as FETOUN AHMED | |
| DOCUMENT | ELEVENTH REPORT OF THE RECEIVER AND MANAGER OF FAISSAL MOUHAMAD PROFESSIONAL CORPORATION, DELTA DENTAL CORP. MICHAEL DAVE MANAGEMENT LTD., 52 DENTAL CORPORATION, 52 WELLNESS CENTRE INC. AND 985842 ALBERTA LTD. | |
| DATED | June 4, 2024 | |
| ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT | Counsel McMillan LLP Suite 1700, 421 7th Avenue SW Calgary, AB T2P 4K9 Telephone: 403-215-2752/ 403-355-3326 Facsimile: 403-531-4720 Email: adam.maerov@mcmillan.ca Attention: Adam Maerov Receiver and Manager MNP Ltd. Suite 1500, 640 5th Avenue SW Calgary, AB T2P 3G4 Telephone: 403-477-9661 Facsimile: 403-269-8450 Email: vanessa.allen@mnp.ca Attention: Vanessa Allen | |

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INTRODUCTION AND BACKGROUND

- 1 On August 23, 2022, the Court of King's Bench of Alberta, known as the Court of Queen's Bench of Alberta at the time (the "**Court**"), granted an Interim Receivership Order (the "**Interim Receivership Order**") appointing MNP Ltd. as Interim Receiver (the "**Interim Receiver**") over all of the current and future assets, undertakings and property (the "**IR Property**") of Faissal Mouhamad Professional Corporation ("**FMPC**"), Delta Dental Corp. ("**DDC**") and 52 Dental Corporation ("**52 Dental**", collectively, the "**IR Companies**"), as more particularly set out in the Interim Receivership Order.
- 2 The Interim Receivership Order was granted pursuant to an application by Royal Bank of Canada ("**RBC**", the "**RBC Application**") which, on September 16, 2022 (the "**Filing Date**"), was owed approximately \$632,600 by FMPC (the "**FMPC Indebtedness**") pursuant to various credit facilities. The FMPC Indebtedness was guaranteed by the related companies, Mclvor Developments Ltd. ("**Mclvor**") and 985842 Alberta Ltd. ("**985842**") and by Dr. Faissal Mouhamad ("**F. Mouhamad**"). The FMPC Indebtedness was secured by a security interest in, among other things, the IR Property. RBC was also owed approximately \$2.5 million (the "**Mclvor Indebtedness**") by Mclvor. The Mclvor Indebtedness was guaranteed by the related companies FMPC, 985842 and Paradise Mclvor Developments Ltd. and by F. Mouhamad.
- 3 The Receiver notes the following key events related to the RBC Application:
 - 3.1. The RBC Application was originally heard on August 23, 2022, at which time RBC sought the appointment of a Receiver and Manager over the IR Companies. At that time, the Interim Receivership Order was granted and the application to appoint a Receiver and Manager was adjourned until September 14, 2022 (the "**September 14 Hearing**").
 - 3.2. In advance of the September 14 Hearing, the RBC Application was amended (the "**Amended RBC Application**") to also include an application to appoint a Receiver over the current and future assets, undertakings and property of 52 Wellness Centre Inc. ("**52 Wellness**"), Michael Dave Management Ltd. ("**MDML**") and 985842.
 - 3.3. The Amended RBC Application was heard on September 14, 2022. On the Filing Date, the Court granted an Order (the "**First Receivership Order**") appointing MNP Ltd. as the Receiver of all of the current and future assets, undertakings and property of the IR Companies, 52 Wellness and MDML. The Amended RBC Application with respect to 985842 was adjourned to September 29, 2022.
 - 3.4. At a hearing on September 29, 2022, a further Order was granted appointing MNP as the Receiver and Manager over all of the current and future assets, undertakings and property of

985842 (the “**Second Receivership Order**”). The First Receivership Order and the Second Receivership Order will collectively be referred to as the “**Receivership Order**”. The IR Companies, 52 Wellness, MDML and 985842 will collectively be referred to as the “**Companies**”. The IR Property together with all of the current and future assets, undertakings and property of 52 Wellness, MDML and 985842 will collectively be referred to as the “**Property**”. MNP Ltd., in its capacity as Receiver and Manager of the Companies will be referred to as the “**Receiver**”.

4. On May 8, 2023, Orders were granted approving the consolidation of the receivership estates of FMPC and DDC and discharging the Receiver in respect of 52 Wellness, subject only to the Receiver completing some administrative tasks and filing its discharge certificate (the “**52 Discharge Certificate**”). The 52 Discharge Certificate was filed on January 30, 2024.
5. Copies of all orders granted by the Court in these proceedings as well as other publicly available documents in these proceedings can be found on the Receiver’s website at: <https://mnpdebt.ca/en/corporate/corporate-engagements/fmpc>.
6. Below is a summary of the entities that are currently or were subject to the receivership proceedings:

| Corporate entity | Directors/ Officers | Description of Operations |
|--|---|--|
| Faissal Mouhamad Professional Corporation o/a Delta Dental Delta Dental Corp. | F. Mouhamad is the sole director and shareholder F. Ahmed is the sole director and shareholder | Operated a dental clinic under the name “Delta Dental” (“ Delta Clinic ”). Had no independent operations; previously managed Delta Clinic on behalf of FMPC; however, no corresponding agreement was in place. |
| 52 Dental Corporation | F. Ahmed is the sole director and shareholder | Operated a dental clinic under the name “52 Dental” (“ 52 Clinic ”). |
| 52 Wellness Centre Inc. | F. Mouhamad is the sole director and shareholder | Owned a building located at 3505 52nd Street SE, Calgary, Alberta (the “ 52 Building ”). The 52 Building housed 52 Dental and other commercial tenants. |
| Michael Dave Management Ltd. | F. Mouhamad is the sole director and shareholder | Owned a building located at 7151 50th Avenue in Red Deer, Alberta (the “ Delta Building ”) that housed the Delta Clinic. |
| 985842 Alberta Ltd. | F. Mouhamad is the sole director and shareholder | Owned a commercial unit located in a building at 108, 5205 Power Center Boulevard in Drayton Valley, Alberta (the “ DV Unit ”). |

7. As noted above, the key assets in the receivership proceedings included two operating dental clinics being the Delta Clinic and the 52 Clinic and three real properties, which are summarized below:
 - 7.1. The 52 Building, which was owned by 52 Wellness and housed the 52 Clinic and three other commercial tenants;
 - 7.2. The Delta Building, which was owned by MDML and housed the Delta Clinic. The Delta Building and the Delta Clinic will collectively be referred to as the “**Delta Property**”; and
 - 7.3. The DV Unit, which was owned by 985842 and housed an unrelated dental practice.

The sale of the Delta Property (the “**Delta Sale**”), the 52 Clinic (the “**52 Clinic Sale**”), the DV Unit (the “**DV Unit Sale**”), and the 52 Wellness Building (the “**52 Building Sale**”) have all been completed.

NOTICE TO READER

8. In preparing this report and making comments herein, the Receiver has relied upon, certain unaudited, draft or internal financial information, including the Companies’ books and records, and information from other third-party sources (collectively, the “**Information**”). The Receiver has not audited, reviewed or otherwise attempted to verify the accuracy or completeness of the Information in a manner that would wholly or partially comply with generally accepted assurance standards or other standards established by the Chartered Professional Accountants of Canada (the “**Standards**”). Additionally, none of the Receiver’s procedures were intended to disclose defalcations or other irregularities. If the Receiver were to perform additional procedures or to undertake an audit examination of the Information in accordance with the Standards, additional matters may have come to the Receiver’s attention. Accordingly, the Receiver does not express an opinion, nor does it provide any other form of assurance on the financial or other information presented herein. The Receiver may refine or alter its observations as further information is obtained or brought to its attention after the date of this report.
9. The Receiver assumes no responsibility or liability for any loss of damage occasioned by any party as a result of the use of this report. Any use, which any party makes of this report, or any reliance or decision to be made based on this report, is the sole responsibility of such party.
10. All amounts included herein are in Canadian dollars unless otherwise stated.

ACTIVITIES OF THE RECEIVER

11. The Tenth Report of the Receiver was dated November 27, 2023 (the “**Tenth Report**”). The Receiver’s activities since the date of the Tenth Report are summarized below:
 - 11.1. Communicating with insurance providers and working with NDC Group Inc. and V. Tran and T. Sivanantha Professional Corporation (collectively, the “**NDC Group**”), the purchaser of the Delta Property, the 52 Clinic and the 52 Building, to reconcile additional receipts collected from insurance providers for the Delta Clinic, which reconciliation has now been completed;
 - 11.2. Communicating with legal counsel for RBC and legal counsel for Jovica Property Management Ltd., Solar Star Holdings Inc. (“**Solar Star**”), 1245233 Alberta Ltd. (“**1245233**”), 1105550 Alberta Inc., and 1193770 Alberta Ltd. (collectively, the “**Jovica Group**”) in order to obtain their position on various matters;
 - 11.3. Filing required GST returns and communicating with Canada Revenue Agency (“**CRA**”) regarding a GST audit;

- 11.4. Maintaining and updating the Receiver's Website;
- 11.5. Consulting with legal counsel on various matters; and
- 11.6. Responding to various other stakeholder inquiries.

PURPOSE OF THE REPORT

- 12. This report constitutes the Eleventh Report of the Receiver (the "**Eleventh Report**"). The Eleventh Report has been prepared to provide the Court with additional information related to an application that is scheduled to be heard on June 12, 2024 (the "**June 12 Application**"). At the June 12 Application the Receiver intends to seek the following relief:
 - 12.1. Approving the reported actions of the Receiver in administering the receivership proceedings for FMPC and DDC, MDML and 985842, provided that only the Receiver, in its personal capacity and with respect to its own personal liability, shall be entitled to rely upon or utilize in any way such approvals;
 - 12.2. Approving the following Receiver's interim statements of receipts and disbursements (the "**Interim SRDs**"):
 - 12.2.1. The Receiver's interim statement of receipts and disbursements for the period from August 23, 2022, to May 31, 2024, for FMPC and DDC (the "**Delta SRD**");
 - 12.2.2. The Receiver's interim statement of receipts and disbursements for the period from September 16, 2022, to May 31, 2024, for MDML (the "**MDML SRD**"); and
 - 12.2.3. The Receiver's interim statement of receipts and disbursements for the period from September 29, 2022, to May 31, 2024, for 985842 (the "**985842 SRD**").
 - 12.3. Approving the following distributions, all net of costs to complete the administration of the respective receivership estates:
 - 12.3.1. Distributions from FMPC and DDC (Collectively, the "**Delta Distributions**"):
 - 12.3.1.1. Payment of CRA's priority claim in the amount of approximately \$18,000 (the "**Delta CRA Priority Claim**");
 - 12.3.1.2. Payments to RBC, the Jovica Group and Canadian Western Bank ("**CWB**", collectively, the "**Settlement Parties**"), as set out in the Consent Order – Distribution of Red Deer Clinic Proceeds granted on December 6, 2023 (the "**Delta Settlement Order**"), net of a cost allocation of 18 percent of the corresponding payment (the "**Delta Cost Allocation**"); and
 - 12.3.1.3. A distribution of the remaining balance in the receivership estate of FMPC and DDC to RBC.

- 12.3.2. Distributions to Solar Star and 1245233 and, to the extent there are additional funds available, to RBC, as further set out herein (the “**MDML Distribution**”).
- 12.3.3. The following distributions from 985842:
 - 12.3.3.1. Payment of CRA’s priority claim in the amount of approximately \$5,300 (the “**985842 CRA Priority Claim**”); and
 - 12.3.3.2. Payment of the remaining balance in the receivership estate into Court, pending a further Court Order or a further agreement between the Jovica Group, Mahmoud Mohamad (“**Mahmoud**”) and any other party who may assert an interest.
- 12.4. Approving the professional fees and disbursements of the Receiver and McMillan LLP, the Receiver’s legal counsel (“**McMillan**”), for the period from January 1, 2023 to April 30, 2024 for each of FMPC and DDC, MDML and 985842 as well as the allocation of professional fees to each of FMPC and DDC and MDML;
- 12.5. Discharging the Receiver in respect of the receiverships of FMPC and DDC, MDML and 985842 upon the filing of respective certificates confirming the completion of the Receiver’s remaining obligations and, upon the discharge of the Receiver:
 - 12.5.1. Releasing the Receiver from liability for any acts or omissions on its part, in relation to the respective receivership, save and except for liability arising out of any fraud, gross negligence or willful misconduct; and
 - 12.5.2. Staying any action or proceedings against the Receiver, in relation to the respective receivership, without prior leave of the Court on notice to the Receiver.
13. The Companies’ receivership proceedings have been highly contested. The Receiver has been attempting to obtain consensus regarding the applications to be heard at the June 12 Hearing for some time but, until recently, was not able to obtain a clear direction from the Companies’ secured claimants. As such, in order to avoid bringing forward a contested application on matters that, in the Receiver’s view, could best be addressed through discussions between the respective stakeholders, the Receiver established the following timeline in relation to the June 12 Hearing:

| Milestones | Deadline |
|---|-----------------|
| The Receiver will provide all parties with a draft of the Eleventh Report and the corresponding fee affidavits prepared in support of the June 12 Hearing | May 10, 2024 |
| All parties must submit any follow-up questions/ requests for additional information | May 17, 2024 |
| The Receiver will respond to any follow up questions/ requests for additional information | May 22, 2024 |
| All parties will have advised the Receiver as to their position regarding the relief being sought at the June 12 Hearing | May 27, 2024 |
| The Receiver will file Court materials related to the June 12 Hearing | June 3, 2024 |

14. As at the date of this report, the timeline has been substantively complied with. The Receiver has been advised that RBC and the Jovica Group are supportive of the relief being sought at the June 12 Hearing.
15. The Receiver has been advised that Mclvor Urban Developments Ltd. ("**Mclvor Urban**") may be objecting to the discharge of the Receiver based on the following:
- 15.1. There are promissory notes registered by FMPC, 985842 and MDML against certain subdivided lands in Chestermere, Alberta (the "**Promissory Notes**") and it is uncertain what the Receiver intends to do with the Promissory Notes. The Receiver previously reviewed the Promissory Notes and determined that they did not have any realizable value. As such, the Receiver does not intend to take any further action with respect to the Promissory Notes; and
- 15.2. Mclvor Urban has expressed a concern that F. Mouhamad is operating a dental clinic under the name "Amara Dental" in Calgary and may have a relationship with Amara Investments Corp. ("**Amara Investments**"), who purchased the DV Unit. Mclvor Urban has also expressed a concern regarding the potential transfer of clinical equipment related to the DV Unit. The Receiver has advised Mclvor Urban as follows:
- 15.2.1. F. Mouhamad referred Amara Investments to the Receiver on the basis that they may be interested in acquiring the DV Unit. Amara Investments subsequently made a successful offer to purchase the DV Unit, which was approved by the Court on February 9, 2024;
- 15.2.2. While there was clinical equipment on-site at the DV Unit, it was owned by the tenant of the DV Unit, who operated a dental clinic out of that location; and

- 15.2.3. As further set out below, pursuant to the Claims Orders (as subsequently defined), McIvor Urban does not have any interest in the personal property of FMPC and DDC, MDML or 985842.

INTERIM STATEMENTS OF RECEIPTS AND DISBURSEMENTS

16. Attached hereto as “Schedule 1” through to “Schedule 3” are Interim Statements of Receipts and Disbursements for various periods ended May 31, 2024 (defined above as the “**Interim SRDs**”). Each of the Interim SRD’s attaches as “Schedule 1” a summary of the professional fees and disbursements paid to each of the Receiver and McMillan. The Delta SRD also includes receipts and disbursements from the interim receivership period.

The Delta SRD

17. As at May 31, 2024, approximately \$1.7 million was being held in trust by the Receiver.
18. The Delta SRD reflects total receipts of approximately \$3.3 million with the receipts over \$50,000 being as follows:
 - 18.1. Approximately \$2.3 million represents the net proceeds from the sale of the Delta Clinic;
 - 18.2. Accounts receivable collections total approximately \$768,700 from dental insurance providers and patients;
 - 18.3. Approximately \$90,200 that was held in the DDC’s bank account with BNS and FMPC’s bank account with RBC at the date of the Interim Receivership Order;
 - 18.4. Miscellaneous receipts of approximately \$70,300, of which approximately \$69,800 relates to interest paid on the balance held in the Receiver’s trust account; and
 - 18.5. Receiver’s borrowings of \$50,000 (the “**Receiver’s Borrowings**”) were advanced by RBC pursuant to the Receivership Order to fund ongoing operating costs for the Delta Clinic and have now been repaid.
19. The Delta SRD reflects total disbursements of approximately \$1.6 million with the disbursements over \$50,000 being as follows:
 - 19.1. Approximately \$658,900 for fees payable to dentists, hygienists and other former employees, who are providing services on a contract basis during the receivership;
 - 19.2. Professional fees and disbursements of approximately \$329,100 for the Receiver and professional fees and disbursements of approximately \$190,700 for the Receiver’s legal counsel, both for the period ended April 30, 2024;
 - 19.3. Operating expenses, including required supplies, of approximately \$100,500;

19.4. Commission of approximately \$92,600 payable to Henry Schein in respect of the sale of the Delta Clinic; and

19.5. Approximately \$51,000 to repay the Receiver's Borrowings, inclusive of interest.

The MDML SRD

20. As at May 31, 2024, approximately \$120,800 was being held in trust by the Receiver.

21. The MDML SRD reflects total receipts of approximately \$1.5 million with the most significant receipt being net sale proceeds of approximately \$1.4 million from the sale of the Delta Building.

22. The MDML SRD reflects total disbursements of approximately \$1.4 million with the disbursements over \$50,000 being as follows:

22.1. A distribution of approximately \$1.0 million to Solar Star and 1245233, which was approved by the Court pursuant to an Order granted on January 11, 2024;

22.2. Professional fees and disbursements of approximately \$171,400 for the Receiver and professional fees and disbursements of approximately \$111,900 for the Receiver's legal counsel, both for the period ended April 30, 2024; and

22.3. Commissions of approximately \$56,000 payable to CBRE Limited in respect of the sale of the Delta Building.

The 985842 SRD

23. As at May 31, 2024, approximately \$164,200 was being held in trust by the Receiver.

24. The 985842 SRD reflects total receipts of approximately \$504,600, with the most significant receipt being approximately \$456,100 representing the net sale proceeds from the DV Unit.

25. The 985842 SRD reflects total disbursements of approximately \$340,400 with the most significant disbursements being the professional fees and disbursements of approximately \$102,600 for the Receiver and professional fees and disbursements of approximately \$180,900 for the Receiver's legal counsel, both for the period ended April 30, 2024.

PROFESSIONAL FEES

26. Attached as "Schedule 4" through to "Schedule 6" are summaries of the Receiver's professional fees and disbursements, (the "**Receiver's Fees**") and McMillan's professional fees and disbursements (the "**Receiver's Legal Fees**") for each of FMPC and DDC, MDML and 985842 for the period from January 1, 2023 to April 30, 2024 including estimates to complete the administration of the respective receivership estates (defined above as the "**Professional Fees**") The Professional Fees are summarized below:

Summary of Professional Fees and Disbursements for FMPC and DDC, MDML and 985842 for the period from January 1, 2023 to April 30, 2024

| Description | FMPC and DDC | | MDML | | 985842 | | Subtotal | GST | Total | | | |
|--------------------------------------|---------------------|----------------|-------------|----------------|---------------|----------------|-----------------|----------------|--------------|---------------|-----------|----------------|
| MNP Ltd. (Billed) | \$ | 166,713 | \$ | 106,901 | \$ | 79,656 | \$ | 353,270 | \$ | 17,933 | \$ | 371,203 |
| MNP Ltd. (Est. to Complete) | | 6,900 | | 15,000 | | 15,000 | | 36,900 | | 1,845 | | 38,745 |
| McMillan LLP (Billed) | | 135,518 | | 71,926 | | 145,345 | | 352,789 | | 38,092 | | 390,881 |
| McMillan (Unpaid Interrogatory Fees) | | - | | 6,331 | | 6,331 | | 12,662 | | 633 | | 13,295 |
| McMillan LLP (Est. to Complete) | | 10,000 | | 10,000 | | 10,000 | | 30,000 | | 1,500 | | 31,500 |
| | \$ | 319,131 | \$ | 210,158 | \$ | 256,332 | \$ | 785,621 | \$ | 60,003 | \$ | 845,624 |

27. At the June 12 Hearing, the Receiver intends to seek approval of the Professional Fees. The Professional Fees have been charged by the Receiver and McMillan at or below their standard hourly rates and, in the Receiver's experience, the standard rates are comparable to the standard rates of other providers of similar services in Alberta. The Receiver notes that, pursuant to an agreement with RBC, the same Receiver's rates were maintained throughout the receivership proceedings, despite the significant amount of time required to complete the respective administrations and significant inflation during that period. The Receiver will make copies of both its accounts and the accounts of McMillan (subject to redaction for privilege) available to the Court and to any interested person upon further request.
28. The Affidavit of Vanessa Allen sworn on June 4, 2024 (the "**Allen Affidavit**"), attaches the Receiver's accounts for the period from January 1, 2023, to April 30, 2024. The Affidavit of Preet Saini also sworn on June 4, 2024, attaches McMillan's accounts for the period from January 2023 to April 30, 2024 (the "**Saini Affidavit**"). The Receiver notes that draft copies of the Allen Affidavit and the Saini Affidavit were provided to all significant stakeholders on May 10, 2023, and that, invoices for the period ended December 31, 2023, had previously been included in sworn affidavits and/or provided to both RBC and the Jovica Group.
29. The Receiver notes that it is their standard practice in insolvency proceedings to obtain approvals for professional fees and disbursements and the corresponding activities at regular intervals. At a hearing on July 17, 2023 (the "**July 17 Hearing**"), at the request of legal counsel for RBC and the Jovica Group, the Court adjourned applications for approval of the Receiver's Fees and the Receiver's Legal Fees for the period from January 1 to May 31, 2023 to the earlier of the completion of the receivership proceedings or March 31, 2024. As such, at the June 12 Hearing, the Receiver intends to seek approval for the Professional Fees, which cover the period from January 1, 2023, to May 31, 2024 and include estimates to complete the administration of the respective receiverships for FMPC & DDC, MDML and 985842.
30. The Receiver notes that the Receiver's Fees for the Companies, excluding 985842, have been allocated between the entities for each billing period, based on an estimated percentage, considering the activities undertaken for each of the Companies (the "**Receiver's Allocation**").
31. The Receiver's Allocation was described in the Seventh Report of the Receiver dated May 1, 2023, and the basis for the Receiver's Allocation is also detailed below for ease of reference:

- 31.1. As all of the Companies were under common control, there was significant overlap between their operations, which made it difficult for the Receiver's activities to be attributed to the various entities. In particular, the Receiver notes the following:
- 31.1.1. FMPC and DDC were both charged with managing the operations of the Delta Clinic. As such, their operations were largely indistinguishable, which is the reason these estates were ultimately consolidated.
 - 31.1.2. The Delta Clinic operated out of the Delta Building, which was owned by MDML. MDML had no operations, outside of the management of the Delta Building and no third-party property management services were in place for the Delta Building.
 - 31.1.3. 52 Dental Corporation operated the 52 Clinic. There was significant overlap in the management of the Delta Clinic and the 52 Clinic, both of which had common dental service providers, some common employees and many common suppliers and insurance providers.
 - 31.1.4. The 52 Clinic operated out of the 52 Building, which was owned by 52 Wellness. The operations of 52 Wellness consisted only of managing the 52 Building and no third-party property management services were in place for the 52 Building.
- 31.2. The sale processes for the Delta Property, the 52 Clinic and the 52 Building were conducted simultaneously with the same broker being used for the Delta Property and the 52 Clinic.
- 31.3. The largest portion of the Receiver's activities were spent in managing the ongoing operations of the Delta Clinic and the 52 Clinic. The Delta Clinic had a greater level of operations during the receivership proceedings compared to the 52 Clinic. As such, it required more of the Receiver's time.
- 31.4. Certain creditors raised objections at various stages of the receivership proceedings, which required the Receiver to prepare and file additional material related to the corresponding Companies. The Receiver has considered this in determining the monthly allocation to each entity.
- 31.5. The Receiver has reviewed the professional fees allocated to each of the Companies and based on its experience, it is satisfied that they are reasonable given the size and scope of the various receiverships. The Receiver also notes that the overlap between the Companies' operations has provided many opportunities for cost savings (for example in communicating with common insurance providers or suppliers).

The Receiver notes that the Receiver's Legal Fees were allocated based on actual time incurred for each of the individual Companies, adjusted for rounding, with expenses being allocated on a pro-

rata basis based on the overall fees charged for each entity during the billing period. As such, the information above, relates specifically to the Receiver Fees.

32. At the June 12 Hearing, the Receiver intends to seek approval of the allocation of the Receiver's Fees to FMPC & DDC, MDML and 985842 since the Receiver is also seeking its discharge in respect those entities and intends to distribute all remaining funds held in the respective receivership estate, subject to approval by the Court of the Delta Distributions, the MDML Distribution and the 985842 Distributions.
33. As further set out in the Ninth Report of the Receiver dated July 10, 2023 (the "Ninth Report"), the Receiver previously provided responses (the "Interrogatory Responses") to written interrogatories submitted by the Jovica Group (the "Jovica Interrogatories"). The Jovica Interrogatories were substantive, and the Interrogatory Responses required a significant amount of time to be incurred. Copies of the Interrogatory Responses are attached as "Schedules 17 and 18" to the Ninth Report. McMillan incurred professional fees of approximately \$12,700 to prepare the Interrogatory Responses (the "Interrogatory Fees"). The Interrogatory Fees were charged by McMillan but have not been paid. They are included herein and in the Saini Fee Affidavit.

THE DISTRIBUTIONS

34. A claims process was approved by the Court pursuant to an Order granted on February 14, 2024 (the "Claims Process"). The Claims Process directed the Receiver to solicit claims from all creditors of the Companies (excluding 52 Wellness) for the purpose of determining the creditors that will be eligible to share in any distributions made in the respective receivership proceedings. The Claims Process was directed to all creditors other than those whose claims related only to registered interests in real property. A summary of priority and secured claims for FMPC and DDC, MDML and 985842 as at May 10, 2024 is below:

| Summary of Priority and Secured Claims as at May 10, 2024 | | | |
|---|-------------------------|-------------------------|-------------------------|
| | FMPC & DDC | MDML | 985842 |
| Canada Revenue Agency* | \$ 17,961 | \$ - | \$ 5,274 |
| Royal Bank of Canada | 3,352,426.96 | 3,352,426.96 | 3,352,426.96 |
| Solar Star Holdings Inc. & 1245233 AB Ltd. (Claim 1 & 2)** | - | 125,000.00 | - |
| 1193770 Alberta Ltd.** | - | - | 971,447.51 |
| CWB National Leasing Inc. | 95,614.43 | | |
| Total admitted claims | \$ 3,466,002.35 | \$ 3,477,426.96 | \$ 4,329,148.03 |
| Claims affected by the Disallowance Orders | | | |
| Bankrupt estate of Sarah Moe aka Sahar Muhamad | Unknown | \$ - | \$ - |
| Mclvor Urban Developments Ltd | 2,393,700.00 | 2,393,700.00 | 2,393,700.00 |
| Mohamad, Mahmoud | 11,259,539.00 | 11,259,539.00 | 11,259,539.00 |
| Total claims affected by Disallowance Orders | \$ 13,653,239.00 | \$ 13,653,239.00 | \$ 13,653,239.00 |
| *The claims filed by CRA have been amended to reflect to priority portion only with the balance having been filed as unsecured. | | | |
| **As updated on May 10, 2024 | | | |

35. Pursuant to the Claims Process, Notice of Revision and Disallowance were issued in respect of the following claims that applied to one or all of FMPC and DDC, MDML and 985842 (the “**Disallowances**”):

| Creditor | Entity | Amount Claimed | Amount Allowed |
|--|---------------|-----------------------|----------------------------|
| Bankrupt estate of Sarah Moe aka Sahar Muhamad | FMPC | Unspecified | Disallowed in its entirety |
| Mahmoud | ALL | \$ 11,259,539.00 | Disallowed in its entirety |
| Mclvor Urban | ALL | \$ 2,393,700.00 | Disallowed in its entirety |

36. Each of the creditors, who had received a Disallowance, filed a Notice of Dispute in respect of that Disallowance (the “**Notice(s) of Dispute**”). Subsequently, the following Orders were granted on December 6, 2023, with respect to the Disallowances (the “**Claim Orders**”)

36.1. Ordering that Mahmoud will not have any recourse to, or interest in, the proceeds of realization of personal property of any of the Companies and the Disallowance (as well as the corresponding Proof of Claim and Notice of Dispute) will not be finally determined in the receivership proceedings unless otherwise ordered by the Court. This Order was granted without prejudice to the rights of Mahmoud to pursue claims against any person other than the Companies, the Companies after the Receiver has been discharged and the proceeds of realization of the DV Unit.

36.2. Ordering that Mclvor Urban and the Trustee of the Bankrupt Estate of Sarah Moe aka Sahar Muhamad shall not have any recourse to or interest in, the proceeds of realization of personal property of any of the Companies and the Disallowances (as well as the corresponding Proofs of Claim and Notices of Dispute) will not be finally determined in the receivership proceedings unless otherwise ordered by the Court. This Order was granted without prejudice to the rights of those parties to pursue claims against any person other than the Companies or the Companies after the Receiver has been discharged.

The Delta Distributions

37. RBC has registrations against FMPC and DDC at the Alberta Personal Property Registry in respect of security interests granted by FMPC and Mclvor for the FMPC Indebtedness and the Mclvor Indebtedness (the “**RBC Security**”). McMillan has completed an independent review of the RBC Security and determined that the RBC Security is, subject to the usual assumptions and qualifications, valid and enforceable as against the consolidated estate of FMPC and DDC.

38. As further set out in the Ninth Report, RBC, CWB and the Jovica Group all asserted claims against some or all of the clinical equipment in use at the Delta Clinic (the “**Delta Equipment**”). As set out above, the Delta Settlement Order set out the amounts payable to RBC, CWB and the Jovica Group from the net sale proceeds of the Delta Equipment (the “**Equipment Proceeds**”). The Receiver has proposed that these payments be made net of the Delta Cost Allocation, which proposition the Receiver understands to be supported by the Settlement Parties.
39. Pursuant to the Claims Process, CRA filed a deemed trust claim for payroll source deductions in the amount of \$18,000 (defined above as the “**Delta CRA Priority Claim**”) and RBC filed a secured proof of claim in the amount of approximately \$3.4 million (the “**RBC Claim**”). In light of the Claim Orders having been granted, outside of the Delta CRA Priority Claim, and the payments due pursuant to the Delta Settlement Order, the Receiver is not aware of any claims that would rank in priority to the RBC Claim. As such, at the June 12 Hearing, the Receiver intends to seek approval to make the following distributions:
- 39.1. The Delta CRA Priority Claim;
- 39.2. Payments of \$40,000 to CWB from the Equipment Proceeds with the remainder of the Equipment Proceeds being split evenly between RBC and the Jovica Group. These payments will be made net of the Delta Cost Allocation; and
- 39.3. A distribution of the remaining balance in the receivership estate of FMPC and DDC to RBC in partial payment of the RBC Claim.

The MDML Distribution

40. 1245233 and Solar Star have registrations against MDML at the Alberta Personal Property Registry and also held a registered mortgage (the “**Delta Mortgage**”) and an assignment of rents and leases in respect of the Delta Building. McMillan completed an independent review of the Delta Mortgage and determined that the Delta Mortgage is, subject to the usual assumptions and qualifications, valid and enforceable as against MDML. The Receiver notes that RBC also has registrations against MDML in the Alberta Personal Property Registry, however, the Delta Building was the only realizable asset in the receivership of MDML.
41. Pursuant to an Order granted on January 11, 2024, the Court approved the distribution of the net sale proceeds from the sale of the Delta Building to 1245233 and Solar Star (defined above as the “**Delta Mortgage Distribution**”), net of priority claims and the amount required to complete the administration of that receivership and on 7 days’ written notice to those parties with registered security interests against the Delta Building and those parties who have requested such notification. Pursuant to the terms of that Order, the Receiver made a distribution of \$1.0 million to Solar Star and 1245233.

42. Pursuant to the Claims Process, Solar Star and the Jovica Group filed claims totaling approximately \$1.5 million, which included the balance due pursuant to the Delta Mortgage (the “**MDML Jovica Claim**”). On May 9, 2024, the Receiver was advised by Duncan Craig LLP, who acts as legal counsel for the Jovica Group (“**Duncan**”) that they had received net sale proceeds from the foreclosure of lands in Cochrane owned by F. Mouhamad, who guaranteed the loans underlying the MDML Jovica Claim. Duncan further indicated that, they were still calculating certain costs and expenses but expected that only approximately \$125,000 was currently outstanding under the MDML Jovica Claim. As noted above, the Jovica Group will be entitled to a distribution under the Delta Settlement Order, which will further decrease the balance owing to them. As such, at the June 12 Hearing, the Receiver intends to seek approval to make a distribution to Solar Star and 1245233 up to the balance due under the MDML Jovica Claim (as finally confirmed by Duncan).
43. Should there be any funds remaining in the receivership of MDML following payment of the MDML Jovica Claim, the Receiver is seeking approval to distribute any remaining funds to RBC, pursuant to the RBC Claim, which is the only other secured claim filed in respect of MDML.

The 985842 Distributions

44. 1193770 has registrations against 985842 at the Alberta Personal Property Registry and also held a registered mortgage (the “**DV Mortgage**”) and an assignment of rents and leases in respect of the DV Unit. McMillan completed an independent review of the DV Mortgage and determined that the DV Mortgage is, subject to the usual assumptions and qualifications, valid and enforceable as against 985842. The Receiver notes that RBC also has registrations against 985842 in the Alberta Personal Property Registry, which may provide them with priority with respect to the personal property of 985842, however, the DV Unit was the only realizable asset in the receivership of 985842.
45. Mahmoud has also asserted a claim against the DV Unit based on a Certificate of Lis Pendens (the “**Mahmoud CLP**”) that was filed against the DV Unit prior to the registration of the DV Mortgage. The Mahmoud CLP relates to an ongoing litigation, the results of which are unknown. As such, in the Receiver’s view, the distribution of the net sale proceeds from the DV Unit can best be addressed at a future date outside of the receivership proceedings.
46. Pursuant to the Claims Process, 1193770 filed a claim for approximately \$816,800 that included the balance due pursuant to the DV Mortgage (the “**985842 Jovica Claim**”). The 985842 Jovica Claim was amended to approximately \$971,400 on May 10, 2023. In addition, CRA filed a deemed trust claim for GST in the amount of \$5,300 (defined above as the “985842 CRA Priority Claim”). In order to conclude the receivership for 985842, the Receiver intends to seek approval to make the following distributions, subject to any required amount to complete the administration of the receivership estate:
- 46.1. Payment of the 985842 CRA Priority Claim; and

- 46.2. Payment into Court of the remaining balance in the receivership to be held subject to a further Order of the Court or further agreement between 1193770, Mahmoud and any other party that may assert an interest.

DISCHARGE OF THE RECEIVER FOR FMPC & DDC, MDML AND 985842

47. The following administrative matters remain outstanding to complete the administration of the respective receiverships of FMPC & DDC, MDML and 985842:
- 47.1. Completing the Delta Distributions, the MDML Distribution and the 985842 Distributions;
 - 47.2. Completing final CRA filings and closing the corresponding business accounts;
 - 47.3. Preparing and issuing the Receiver's final reports pursuant to Section 246(3) of the *Bankruptcy and Insolvency Act*;
 - 47.4. Preparing the respective final statements of receipts and disbursements that will be attached to the respective Receiver's certificates; and
 - 47.5. Any other matters incidental to completing the administration of the respective receiverships.
48. Upon completion of the administrative matters described above, the Receiver will file discharge certificates for the respective receiverships.
49. The Receiver notes that the administration of the receivership of 52 Dental is also substantially complete. The Receiver will, however, not be in a position to seek their discharge in respect of 52 Dental until such time as the Court has rendered its decision regarding the entitlement of RBC and Patterson Dental Canada Inc. to equipment in use at 52 Dental, which matter was heard by the Court on December 6, 2023.

RECOMMENDATION AND CONCLUSION

50. The Eleventh Report has been prepared to provide the Court with additional information related to relief sought at the June 12 Hearing, including the following:
- 50.1. Approving the reported actions of the Receiver in administering the receivership proceedings for FMPC and DDC, MDML and 985842, provided that only the Receiver, in its personal capacity and with respect to its own personal liability, shall be entitled to rely upon or utilize in any way such approvals;
 - 50.2. Approving the Interim SRDs;
 - 50.3. Approving the Delta Distributions, the MDML Distribution and the 985842 Distributions;
 - 50.4. Approving the Professional Fees;

50.5. Discharging the Receiver in respect of the receiverships of FMPC and DDC, MDML and 985842 upon the filing of respective certificates confirming the completion of the Receiver's remaining obligations and, upon the discharge of the Receiver:

50.5.1. Releasing the Receiver from liability for any acts or omissions on its part, in relation to the respective receivership, save and except for liability arising out of any fraud, gross negligence or willful misconduct; and

50.5.2. Staying any action or proceedings against the Receiver, in relation to the respective receivership, without prior leave of the Court on notice to the Receiver.

All of which is respectfully submitted this 4th day of June 2024.

MNP Ltd., in its capacity as Receiver and Manager of Faissal Mouhamad Professional Corporation, Delta Dental Corporation, 52 Dental Corporation, 52 Wellness Centre Inc., Michael Dave Management Ltd. and 985842 Alberta Ltd. and not in its personal or corporate capacity



Per: _____
Vanessa Allen, B. Comm, CIRP, LIT
Senior Vice President

SCHEDULES

SCHEDULE 1

Faissal Mouhamad Professional Corporation ("FMPC") and Delta Dental Corp. ("DDC")
Interim Statement of Receipts and Disbursements
For the Period from August 23, 2022 to May 31, 2024

| | | Notes |
|---|---------------------|--------------|
| Sale of assets | \$ 2,345,571 | 1 |
| Accounts receivable | 768,681 | 2 |
| Cash held in financial institutions | 90,177 | 3 |
| Receiver's certificate | 50,000 | 4 |
| Miscellaneous receipts | 70,333 | |
| GST collected | 250 | |
| Total receipts: | 3,325,012 | |
| Disbursements: | | |
| Contractor fees | 658,878 | 5 |
| Receiver's fees and disbursements | 329,135 | 6 |
| Receiver's legal fees and disbursements | 190,697 | 7 |
| Operating expenses | 100,462 | 8 |
| Commission | 92,600 | 9 |
| Repayment of receiver's borrowings | 50,990 | 4 |
| Rent expense | 44,761 | 10 |
| Payroll | 40,618 | 11 |
| Interim Receiver's fees and disbursements | 38,813 | 12 |
| GST Paid | 38,769 | |
| Reimbursement of funds paid in error | 10,789 | |
| Utilities | 9,141 | |
| Property taxes | 8,097 | |
| Appraisals | 6,495 | |
| Interim Receiver's legal fees and disbursements | 6,064 | 12 |
| Insurance | 4,034 | |
| Miscellaneous expenses | 4,909 | |
| Patient refunds | 2,919 | |
| Total disbursements: | 1,638,169 | |
| Net available cash: | 1,686,842.45 | |

Notes - general:

1. On August 23, 2022, the Court of King's Bench of Alberta (the "Court") granted an Interim Receivership Order appointing MNP Ltd. as Interim Receiver over all of the current and future assets, undertakings and property of FMPC o/a Delta Dental and Delta Dental Corp. (the "Property"). On September 16, 2022 (the "Receivership Date"), the Court granted a further Order (the "Receivership Order") appointing MNP Ltd. as Receiver and Manager over the Property. The Interim Statement of Receipts and Disbursements above includes the Interim Receivership and the Receivership period.

Notes - specific:

1. Represents the net sale proceeds from the sale of a dental practice known as Delta Dental (the "Delta Clinic"), which operated out of premises located at 7151 50 Avenue in Red Deer, Alberta (the "Delta Building"). The Sale of the Delta Clinic was approved by the Court pursuant to an Order granted on January 11, 2023 and closed on March 10, 2023.
2. Represents amounts collected from patients and their insurance providers.
3. Represents amounts collected from FMPC's account with Royal Bank of Canada and DDC's account with Scotiabank (the "DDC Account") since the date of interim receivership. The amount collected from the DDC Account is net of payroll \$67,317 that was paid directly from the DDC Account.
4. Pursuant to the Receivership Order, borrowings of \$50,000 were advanced to the Receiver. These borrowings, including applicable interest were repaid on March 13, 2023.
5. Represents payments to dentists, hygienists and contractors.
6. Represents the professional fees and disbursements of the Receiver for the period ended April 30, 2024.
7. Represents the professional fees and disbursements of the Receiver's legal counsel, McMillan LLP, for the period ended April 30, 2024.
8. Operating expenses include various dental supplies and patient labs.

**Faissal Mouhamad Professional Corporation ("FMPC") and Delta Dental
Corp. ("DDC")
Interim Statement of Receipts and Disbursements
For the Period from August 23, 2022 to May 31, 2024**

9. Represents the amount payable to Tier Three Brokerage Ltd. a division of Henry Schein for commission on the sale of the Delta Clinic.
10. Represents per-diem rent payable for the post-receivership period, based on an opinion on the market lease rate prepared by Newmark Knight Frank Canada Ltd. Operating expenses were paid directly by Delta Dental over the course of the receivership.
11. Represents payroll prior to the Receivership Date, including the required Canada Revenue Agency payroll source deduction remittances as well as eligible overtime incentives.
12. Represents professional fees and disbursements of the Interim Receiver and their legal counsel, McMillan LLP, prior to the Receivership Date.

**In the Matter of the Receivership of
Faissal Mouhamad Professional Corporation o/a Delta Dental and Delta Dental Corp.
Summary of Professional Fees and Disbursements For the Period Ended April 30, 2024**

MNP Ltd.

| Invoice date | Invoice number | Description | Subtotal | GST | Total |
|---|----------------|---|-------------------|------------------|-------------------|
| October 11, 2022 | 10616319 | For the period ended October 10, 2022 | \$ 63,357 | \$ 3,168 | \$ 66,525 |
| November 14, 2022 | 10659181 | For the period ended October 31, 2022 | 42,155 | 2,108 | 44,263 |
| December 19, 2022 | 10705899 | For the period ended November 30, 2022 | 32,798 | 1,640 | 34,438 |
| January 5, 2023 | 10728183 | For the period ended December 31, 2022 | 24,112 | 1,206 | 25,318 |
| February 27, 2023 | 10808654 | For the period ended January 31, 2023 | 32,565 | 1,628 | 34,193 |
| March 13, 2023 | 10836437 | For the period ended February 28, 2023 | 26,875 | 1,344 | 28,218 |
| April 14, 2023 | 10925377 | For the period ended March 31, 2023 | 26,218 | 1,311 | 27,529 |
| May 11, 2023 | 11026745 | For the period ended April 30, 2023 | 22,468 | 1,123 | 23,592 |
| June 9, 2023 | 11085201 | For the period ended May 31, 2023 | 16,700 | 835 | 17,535 |
| July 25, 2023 | 11148382 | For the period ended June 30, 2023 | 19,837 | 992 | 20,828 |
| August 1, 2023 | 11169042 | For the period ended July 31, 2023 | 10,077 | 504 | 10,581 |
| September 6, 2023 | 11213222 | For the period ended August 31, 2023 | 3,845 | 192 | 4,037 |
| October 26, 2023 | 11274971 | For the period ended September 30, 2023 | 4,727 | 236 | 4,964 |
| November 6, 2023 | 11299415 | For the period ended October 31, 2023 | 3,402 | 170 | 3,572 |
| January 3, 2024 | 11382993 | For the period ended December 31, 2023 (Nov-Dec)* | - | - | - |
| February 12, 2024 | 11439686 | For the period ended January 31, 2024 | - | - | - |
| March 28, 2024 | 11545339 | For the period ended February 29, 2024 | - | - | - |
| April 8, 2024 | 11577511 | For the period ended March 31, 2024 | - | - | - |
| May 7, 2024 | 11699481 | For the period ended April 30, 2024 | - | - | - |
| Total fees and disbursements of MNP Ltd. | | | \$ 329,135 | \$ 16,457 | \$ 345,592 |

*Professional fees have been discounted by \$20,054 for the period ended April 30, 2024 and will be discounted by an additional \$8,100 pursuant to an agreement with RBC Royal Bank

McMillan LLP

| Invoice date | Invoice number | Description | Subtotal | GST | Total |
|---|----------------|---|-------------------|------------------|-------------------|
| October 27, 2022 | 3017151 | For the period ended September 30, 2022 | \$ 17,794 | \$ 952 | \$ 18,746 |
| November 14, 2022 | 3017277 | For the period ended October 31, 2022 | 19,035 | 382 | 19,417 |
| December 12, 2022 | 3017443 | For the period ended November 30, 2022 | 7,718 | 531 | 8,249 |
| December 31, 2022 | 3017650 | For the period ended December 31, 2022 | 10,632 | 2,450 | 13,082 |
| February 16, 2023 | 3017826 | For the period ended January 31, 2023 | 49,010 | 1,326 | 50,337 |
| March 9, 2023 | 3017919 | For the period ended February 28, 2023 | 26,590 | 562 | 27,152 |
| April 12, 2023 | 3018059 | For the period ended March 31, 2023 | 11,368 | 265 | 11,633 |
| May 10, 2023 | 3018224 | For the period ended April 30, 2023 | 5,312 | 342 | 5,654 |
| May 31, 2023 | 3018308 | For the period ended May 31, 2023 | 6,854 | 230 | 7,085 |
| July 26, 2023 | 3018583 | For the period ended June 30, 2023 | 4,617 | 230 | 4,848 |
| July 31, 2023 | 3018618 | For the period ended July 31, 2023 | 7,178 | 358 | 7,536 |
| September 12, 2023 | 3018858 | For the period ended August 31, 2023 | 1,714 | 115 | 1,830 |
| October 16, 2023 | 3019026 | For the period ended September 30, 2023 | 2,434 | 146 | 2,580 |
| November 9, 2023 | 3019260 | For the period ended October 31, 2023 | 2,922 | 482 | 3,404 |
| December 11, 2023 | 3019483 | For the period ended November 30, 2023 | 9,642 | 220 | 9,862 |
| December 31, 2023 | 3019756 | For the period ended December 31, 2023 | 4,427 | 17 | 4,444 |
| February 7, 2024 | 3019877 | For the period ended January 31, 2024 | 343 | 107 | 450 |
| March 12, 2024 | 3020073 | For the period ended February 29, 2024 | 2,144 | 10 | 2,155 |
| April 10, 2024 | 3020254 | For the period ended March 31, 2024 | 207 | 9,470 | 9,677 |
| May 7, 2024 | 3020455 | For the period ended April 30, 2024 | 754 | 38 | 792 |
| Total fees and disbursements of McMillan LLP | | | \$ 190,697 | \$ 18,234 | \$ 208,930 |
| Total Professional Fees and Disbursements | | | \$ 519,832 | \$ 34,691 | \$ 554,523 |

SCHEDULE 2

Michael Dave Management Ltd. ("MDML")
Receiver's Interim Statement of Receipts and Disbursements
For the Period From September 16, 2022 to May 31, 2024

| | | <u>Notes</u> |
|---|-------------------|--------------|
| Receipts: | | |
| Sale of assets | \$ 1,421,845 | 1 |
| Rent collected | 44,761 | 2 |
| Miscellaneous receipts | 18,515 | 3 |
| Cash held in financial institutions | 3,588 | 4 |
| GST collected | 2,238 | |
| Total receipts: | 1,490,946 | |
| Disbursements: | | |
| Distribution to secured lender | 1,000,000 | 5 |
| Receiver's fees and disbursements | 171,440 | 6 |
| Receiver's legal fees and disbursements | 111,942 | 7 |
| Commission | 56,000 | 8 |
| GST Paid | 17,195 | |
| Insurance | 8,534 | |
| Appraisal | 5,000 | |
| Miscellaneous disbursements | 73 | |
| Total disbursements: | 1,370,184 | |
| Net available cash: | \$ 120,762 | |

Notes - general:

1. On September 16, 2022, the Court of King's Bench of Alberta (the "Court") granted a Receivership Order appointing MNP Ltd. as Receiver and Manager over all of the current and future assets, undertakings and property of MDML.

Notes - specific:

1. Represents the net sale proceeds from the sale of a building located at 7151 50 Avenue in Red Deer, Alberta, which houses a dental practice known as Delta Dental (the "Delta Building"). The Sale of the Delta Building was approved by the Court pursuant to an Order granted on January 11, 2023 and closed on March 10, 2023.
2. Represents per-diem rent payable for the post-receivership period, based on an opinion on the market lease rate prepared by Newmark Knight Frank Canada Ltd. Operating expenses were paid directly by Delta Dental over the course of the receivership.
3. Represents interest and the refunds of unused insurance premiums.
4. Represents the amount collected from MDML's account with TD Bank.
5. Represents a distribution to Solar Star Holdings Inc. and 1245233 Alberta Ltd., which was approved by the Court pursuant to an Order granted on January 11, 2023.
6. Represents the professional fees and disbursements of the Receiver for the period ended April 30, 2024.
7. Represents the professional fees and disbursements of the Receiver's legal counsel, McMillan LLP, for the period ended April 30, 2024.
8. Represents the amount payable to CBRE Limited for commission on the sale of the Delta Building.

**In the Matter of the Receivership of
Michael Dave Management Ltd.**

Summary of Professional Fees and Disbursements For the Period Ended April 30, 2024

MNP Ltd.

| Invoice date | Invoice No. | Description | Subtotal | GST | Total |
|---|--------------------|--|-------------------|-----------------|-------------------|
| October 11, 2022 | 10616319 | For the period ended October 10, 2022 | \$ 14,079 | \$ 704 | \$ 14,783 |
| November 14, 2022 | 10659181 | For the period ended October 31, 2022 | 18,067 | 903 | 18,970 |
| December 19, 2022 | 10705899 | For the period ended November 30, 2022 | 12,299 | 615 | 12,914 |
| January 5, 2023 | 10728183 | For the period ended December 31, 2022 | 20,094 | 1,005 | 21,098 |
| February 27, 2023 | 10808654 | For the period ended January 31, 2023 | 18,609 | 930 | 19,539 |
| March 13, 2023 | 10836437 | For the period ended February 28, 2023 | 23,036 | 1,152 | 24,187 |
| April 14, 2023 | 10925377 | For the period ended March 31, 2023 | 16,386 | 819 | 17,205 |
| May 11, 2023 | 11026745 | For the period ended April 30, 2023 | 9,910 | 496 | 10,406 |
| June 9, 2023 | 11085201 | For the period ended May 31, 2023 | 10,280 | 514 | 10,794 |
| July 25, 2023 | 11148382 | For the period ended June 30, 2023 | 6,612 | 331 | 6,943 |
| August 1, 2023 | 11169042 | For the period ended July 31, 2023 | 7,558 | 378 | 7,936 |
| September 6, 2023 | 11213222 | For the period ended August 31, 2023 | 1,922 | 96 | 2,018 |
| October 26, 2023 | 11274971 | For the period ended September 30, 2023 | 1,576 | 79 | 1,655 |
| November 6, 2023 | 11299415 | For the period ended October 31, 2023 | 1,134 | 57 | 1,191 |
| January 3, 2024 | 11382993 | For the period ended December 31, 2023 (Nov-Dec) | 3,905 | 195 | 4,100 |
| February 12, 2024 | 11439686 | For the period ended January 31, 2024 | 1,308 | 196 | 1,504 |
| March 28, 2024 | 11545339 | For the period ended February 29, 2024 | 1,172 | 197 | 1,369 |
| April 8, 2024 | 11577511 | For the period ended March 31, 2024 | 476 | 24 | 500 |
| May 7, 2024 | 11699481 | For the period ended April 30, 2024 | 3,018 | 151 | 3,169 |
| Total fees and disbursements of MNP Ltd. | | | \$ 171,440 | \$ 8,841 | \$ 180,281 |

McMillan LLP

| Invoice date | Invoice No. | Description | Subtotal | GST | Total |
|---|--------------------|---|-------------------|------------------|-------------------|
| October 27, 2022 | 3017151 | For the period ended September 30, 2022 | \$ 6,722 | \$ 163 | \$ 6,885 |
| November 14, 2022 | 3017277 | For the period ended October 31, 2022 | 3,256 | 562 | 3,819 |
| December 12, 2022 | 3017443 | For the period ended November 30, 2022 | 11,350 | 933 | 12,283 |
| December 31, 2022 | 3017650 | For the period ended December 31, 2022 | 18,687 | 373 | 19,060 |
| February 16, 2023 | 3017826 | For the period ended January 31, 2023 | 7,458 | 663 | 8,121 |
| March 9, 2023 | 3017919 | For the period ended February 28, 2023 | 13,295 | 299 | 13,594 |
| April 12, 2023 | 3018059 | For the period ended March 31, 2023 | 6,039 | 309 | 6,348 |
| May 10, 2023 | 3018224 | For the period ended April 30, 2023 | 6,198 | 188 | 6,386 |
| May 31, 2023 | 3018308 | For the period ended May 31, 2023 | 3,770 | 466 | 4,236 |
| July 26, 2023 | 3018583 | For the period ended June 30, 2023 | 9,342 | 466 | 9,809 |
| July 31, 2023 | 3018618 | For the period ended July 31, 2023 | 7,548 | 376 | 7,924 |
| September 12, 2023 | 3018858 | For the period ended August 31, 2023 | 1,714 | 104 | 1,818 |
| October 16, 2023 | 3019026 | For the period ended September 30, 2023 | 2,182 | 133 | 2,314 |
| November 9, 2023 | 3019260 | For the period ended October 31, 2023 | 2,658 | 219 | 2,877 |
| December 11, 2023 | 3019483 | For the period ended November 30, 2023 | 4,373 | 216 | 4,589 |
| December 31, 2023 | 3019756 | For the period ended December 31, 2023 | 4,359 | 75 | 4,434 |
| February 7, 2024 | 3019877 | For the period ended January 31, 2024 | 1,501 | 30 | 1,531 |
| March 12, 2024 | 3020073 | For the period ended February 29, 2024 | 596 | 18 | 614 |
| April 10, 2024 | 3020254 | For the period ended March 31, 2024 | 362 | 5,547 | 5,908 |
| May 7, 2024 | | For the period ended April 30, 2024 | 532 | 27 | 559 |
| Total fees and disbursements of McMillan LLP | | | \$ 111,942 | \$ 11,166 | \$ 123,108 |

Total Professional Fees and Disbursements

\$ 283,382 \$ 20,007 \$ 303,389

SCHEDULE 3

985842 Alberta Ltd. ("985842")
Interim Statement of Receipts and Disbursements
For the Period From September 29, 2022 to May 31, 2024

| | | <u>Notes</u> |
|---|--------------------------|--------------|
| Receipts: | | |
| Sale of assets | \$ 456,116 | 1 |
| Rent | 26,173 | 2 |
| GST Refund | 12,004 | |
| GST collected | 1,309 | |
| Miscellaneous receipts | 8,988 | |
| Total receipts: | <u>504,589</u> | |
| Disbursements: | | |
| Receiver's legal fees and disbursements | 180,948 | 3 |
| Receiver's fees and disbursements | 102,592 | 4 |
| Commission | 23,000 | 5 |
| Repairs and maintenance | 7,616 | |
| Insurance | 4,533 | |
| Appraisal | 5,000 | |
| Miscellaneous | 695 | |
| GST paid | 16,052 | |
| Total disbursements: | <u>340,435</u> | |
| Net available cash: | <u><u>\$ 164,154</u></u> | |

Notes - general:

1. On September 29, 2022, the Court of King's Bench of Alberta granted a Receivership Order appointing MNP Ltd. as Receiver and Manager over all of the current and future assets, undertakings and property of 985842.

Notes - specific:

1. Represents the net sale proceeds from the sale of a unit located at 5207 Power Centre Boulevard, in Drayton Valley, Alberta (the "DV Unit"), which houses a dental practice known as Valley Dental. The Sale of the DV Unit was approved by the Court pursuant to an Order granted on February 9, 2023.
2. Represents rent collected from the sole tenant of the DV Unit.
3. Represents the professional fees and disbursements of the Receiver's legal counsel, McMillan LLP, for the period ended April 30, 2024.
4. Represents the professional fees and disbursements of the Receiver for the period ended April 30, 2024.
5. Represents the amount payable to NAI Commercial Real Estate Inc. for commission on the sale of the DV Unit.

**In the Matter of the Receivership of
985842 Alberta Ltd.
Summary of Professional Fees and Disbursements For the Period Ended April 30, 2024**

MNP Ltd.

| Invoice date | Invoice number | Description | Subtotal | GST | Total |
|---|-----------------------|--|-------------------|-----------------|-------------------|
| October 11, 2022 | 10616476 | For the period ended October 10, 2022 | \$ 8,345 | \$ 417 | \$ 8,762 |
| November 14, 2022 | 10658998 | For the period ended October 31, 2022 | 4,458 | 223 | 4,681 |
| December 14, 2022 | 10701491 | For the period ended November 30, 2022 | 3,159 | 158 | 3,317 |
| January 5, 2023 | 10728165 | For the period ended December 31, 2022 | 6,974 | 349 | 7,323 |
| February 21, 2023 | 10792355 | for the period ended January 31, 2023 | 23,907 | 1,195 | 25,103 |
| March 13, 2023 | 10836421 | For the period ended February 28, 2023 | 15,807 | 790 | 16,597 |
| April 24, 2023 | 10961755 | For the period ended March 31, 2023 | 3,231 | 162 | 3,393 |
| May 11, 2023 | 11026926 | For the period ended April 30, 2023 | 4,461 | 223 | 4,684 |
| June 6, 2023 | 11083075 | For the period ended May 31, 2023 | 6,449 | 322 | 6,771 |
| July 25, 2023 | 11148398 | For the period ended June 30, 2023 | 4,955 | 248 | 5,203 |
| August 1, 2023 | 11169089 | For the period ended July 31, 2023 | 10,451 | 523 | 10,974 |
| September 6, 2023 | 11213307 | For the period ended August 31, 2023 | 2,282 | 114 | 2,396 |
| October 10, 2023 | 11257016 | For the period ended September 30,2023 | 1,578 | 79 | 1,657 |
| November 6, 2023 | 11299407 | For the period ended October 31, 2023 | 336 | 17 | 353 |
| January 3, 2024 | 11382988 | For the period ended December 31, 2023 (Nov-Dec) | 3,717 | 186 | 3,903 |
| February 12, 2024 | 11439664 | For the period ended January 31, 2024 | 819 | 41 | 860 |
| March 28, 2024 | 11544840 | For the period ended February 29, 2024 | 456 | 23 | 479 |
| May 7, 2024 | 11699453 | For the period ended April 30, 2024 | 1,207 | 60 | 1,267 |
| Total fees and disbursements of MNP Ltd. | | | \$ 102,592 | \$ 5,130 | \$ 107,722 |

McMillan LLP

| Invoice date | Invoice number | Description | Subtotal | GST | Total |
|---|-----------------------|---|-------------------|------------------|-------------------|
| October 27, 2022 | 3017151 | For the period ended September 30, 2022 | \$ 1,582 | \$ 273 | \$ 1,855 |
| November 14, 2022 | 3017277 | For the period ended October 31, 2022 | 5,466 | 552 | 6,018 |
| December 12, 2022 | 3017443 | For the period ended November 30, 2022 | 11,131 | 870 | 12,001 |
| December 31, 2022 | 3017650 | For the period ended December 31, 2022 | 17,424 | 1,758 | 19,182 |
| February 16, 2023 | 3017826 | For the period ended January 31, 2023 | 35,160 | 1,658 | 36,817 |
| March 9, 2023 | 3017919 | For the period ended February 28, 2023 | 33,238 | 492 | 33,729 |
| April 12, 2023 | 3018059 | For the period ended March 31, 2023 | 9,947 | 427 | 10,374 |
| May 10, 2023 | 3018224 | For the period ended April 30, 2023 | 8,559 | 530 | 9,088 |
| May 31, 2023 | 3018308 | For the period ended May 31, 2023 | 10,624 | 681 | 11,306 |
| July 26, 2023 | 3018583 | For the period ended June 30, 2023 | 13,653 | 681 | 14,334 |
| July 31, 2023 | 3018618 | For the period ended July 31, 2023 | 15,691 | 782 | 16,473 |
| September 12, 2023 | 3018858 | For the period ended August 31, 2023 | 2,389 | 84 | 2,473 |
| October 16 2023 | 3019026 | For the period ended September 30, 2023 | 1,766 | 181 | 1,946 |
| November 9, 2023 | 3019260 | For the period ended October 31, 2023 | 3,621 | 219 | 3,839 |
| December 11 2023 | 3019483 | For the period ended November 30, 2023 | 4,373 | 216 | 4,589 |
| December 31, 2023 | 3019756 | For the period ended December 31, 2023 | 4,359 | 24 | 4,383 |
| February 7, 2024 | 3019877 | For the period ended January 31, 2024 | 477 | 30 | 507 |
| March 12, 2024 | 3020073 | For the period ended February 29, 2024 | 596 | 18 | 614 |
| April 10, 2024 | 3020254 | For the period ended March 31, 2024 | 362 | 8,990 | 9,352 |
| May 7, 2024 | 3020455 | For the period ended April 30, 2024 | 532 | 27 | 559 |
| Total fees and disbursements of McMillan LLP | | | \$ 180,948 | \$ 18,491 | \$ 199,438 |
| Total Professional Fees and Disbursements | | | \$ 283,540 | \$ 23,620 | \$ 307,160 |

SCHEDULE 4

**In the Matter of the Receivership of
Faissal Mouhamad Professional Corporation o/a Delta Dental and Delta Dental Corp.
Summary of Professional Fees and Disbursements for the Period From January 1, 2023 to April 30, 2024 Including Estimates to Complete the
Administration of the Receivership**

MNP Ltd.

| Invoice date | Invoice number | Description | Subtotal | GST | Total |
|---|----------------|---|-------------------|-----------------|-------------------|
| February 27, 2023 | 10808654 | For the period ended January 31, 2023 | \$ 32,565 | \$ 1,628 | \$ 34,193 |
| March 13, 2023 | 10836437 | For the period ended February 28, 2023 | 26,875 | 1,344 | 28,218 |
| April 14, 2023 | 10925377 | For the period ended March 31, 2023 | 26,218 | 1,311 | 27,529 |
| May 11, 2023 | 11026745 | For the period ended April 30, 2023 | 22,468 | 1,123 | 23,592 |
| June 9, 2023 | 11085201 | For the period ended May 31, 2023 | 16,700 | 835 | 17,535 |
| July 25, 2023 | 11148382 | For the period ended June 30, 2023 | 19,837 | 992 | 20,828 |
| August 1, 2023 | 11169042 | For the period ended July 31, 2023 | 10,077 | 504 | 10,581 |
| September 6, 2023 | 11213222 | For the period ended August 31, 2023 | 3,845 | 192 | 4,037 |
| October 26, 2023 | 11274971 | For the period ended September 30, 2023 | 4,727 | 236 | 4,964 |
| November 6 2023 | 11299415 | For the period ended October 31, 2023 | 3,402 | 170 | 3,572 |
| January 3, 2024 | 11382993 | For the period ended December 31, 2023 (Nov-Dec)* | - | - | - |
| February 12, 2024 | 11439686 | For the period ended January 31, 2024 | - | - | - |
| March 28, 2024 | 11545339 | For the period ended February 29, 2024 | - | - | - |
| April 8, 2024 | 11577511 | For the period ended March 31, 2024 | - | - | - |
| May 7, 2024 | 11699481 | For the period ended April 30, 2024 | - | - | - |
| Subtotal to April 30, 2024 (Paid) | | | 166,713 | 8,336 | 175,048 |
| Estimated fees to complete the administration of the receivership | | | 15,000 | 750 | 15,750 |
| Less: | | | | | |
| Estimated Discount | | | - 8,100 | - 405 | - 8,505 |
| Total fees and disbursements of MNP Ltd. | | | \$ 173,613 | \$ 8,681 | \$ 182,293 |

*Professional fees have been discounted by \$20,054 for the period ended April 30, 2024 and will be discounted by an additional \$8,100 pursuant to an agreement with RBC Royal Bank

McMillan LLP

| Invoice date | Invoice number | Description | Subtotal | GST | Total |
|---|----------------|---|-------------------|------------------|-------------------|
| February 16, 2023 | 3017826 | For the period ended January 31, 2023 | \$ 49,010 | \$ 2,450 | \$ 51,460 |
| March 9, 2023 | 3017919 | For the period ended February 28, 2023 | 26,590 | 1,326 | 27,916 |
| April 12, 2023 | 3018059 | For the period ended March 31, 2023 | 11,368 | 562 | 11,930 |
| May 10, 2023 | 3018224 | For the period ended April 30, 2023 | 5,312 | 265 | 5,577 |
| May 31, 2023 | 3018308 | For the period ended May 31, 2023 | 6,854 | 342 | 7,196 |
| July 26, 2023 | 3018583 | For the period ended June 30, 2023 | 4,617 | 230 | 4,848 |
| July 31, 2023 | 3018618 | For the period ended July 31, 2023 | 7,178 | 358 | 7,536 |
| September 12, 2023 | 3018858 | For the period ended August 31, 2023 | 1,714 | 85 | 1,799 |
| October 16 2023 | 3019026 | For the period ended September 30, 2023 | 2,434 | 115 | 2,550 |
| November 9, 2023 | 3019260 | For the period ended October 31, 2023 | 2,922 | 146 | 3,067 |
| December 11 2023 | 3019483 | For the period ended November 30, 2023 | 9,642 | 482 | 10,124 |
| December 31, 2023 | 3019756 | For the period ended December 31, 2023 | 4,427 | 220 | 4,647 |
| February 7, 2024 | 3019877 | For the period ended January 31, 2024 | 343 | 17 | 360 |
| March 12, 2024 | 3020073 | For the period ended February 29, 2024 | 2,144 | 107 | 2,252 |
| April 10, 2024 | 3020254 | For the period ended March 31, 2024 | 207 | 10 | 217 |
| May 7, 2024 | 3020455 | For the period ended April 30, 2024 | 754 | 38 | 792 |
| | | | 135,518 | 6,753 | 142,271 |
| Estimated fees to complete the administration of the receivership | | | 10,000 | 500 | 10,500 |
| Total fees and disbursements of McMillan LLP | | | \$ 145,518 | \$ 7,253 | \$ 152,771 |
| Total Professional Fees and Disbursements | | | \$ 319,131 | \$ 15,934 | \$ 335,064 |

SCHEDULE 5

**In the Matter of the Receivership of
Michael Dave Management Ltd.**

**Summary of Professional Fees and Disbursements for the Period From January 1, 2023 to April 30, 2024 Including Estimates to Complete
the Administration of the Receivership**

MNP Ltd.

| Invoice date | Invoice No. | Description | Subtotal | GST | Total |
|---------------------|--------------------|--|-----------------|------------|--------------|
| February 27, 2023 | 10808654 | For the period ended January 31, 2023 | \$ 18,609 | \$ 930 | \$ 19,539 |
| March 13, 2023 | 10836437 | For the period ended February 28, 2023 | 23,036 | 1,152 | 24,187 |
| April 14, 2023 | 10925377 | For the period ended March 31, 2023 | 16,386 | 819 | 17,205 |
| May 11, 2023 | 11026745 | For the period ended April 30, 2023 | 9,910 | 496 | 10,406 |
| June 9, 2023 | 11085201 | For the period ended May 31, 2023 | 10,280 | 514 | 10,794 |
| July 25, 2023 | 11148382 | For the period ended June 30, 2023 | 6,612 | 331 | 6,943 |
| August 1, 2023 | 11169042 | For the period ended July 31, 2023 | 7,558 | 378 | 7,936 |
| September 6, 2023 | 11213222 | For the period ended August 31, 2023 | 1,922 | 96 | 2,018 |
| October 26, 2023 | 11274971 | For the period ended September 30, 2023 | 1,576 | 79 | 1,655 |
| November 6, 2023 | 11299415 | For the period ended October 31, 2023 | 1,134 | 57 | 1,191 |
| January 3, 2024 | 11382993 | For the period ended December 31, 2023 (Nov-Dec) | 3,905 | 195 | 4,100 |
| February 12, 2024 | 11439686 | For the period ended January 31, 2024 | 1,308 | 196 | 1,504 |
| March 28, 2024 | 11545339 | For the period ended February 29, 2024 | 1,172 | 197 | 1,369 |
| April 8, 2024 | 11577511 | For the period ended March 31, 2024 | 476 | 24 | 500 |
| May 7, 2024 | 11699481 | For the period ended April 30, 2024 | 3,018 | 151 | 3,169 |
| | | | 106,901 | 5,615 | 112,515 |

Estimated fees to complete the administration of the receivership

15,000 750 15,750

Total estimated fees of MNP Ltd.

\$ 121,901 \$ 6,365 \$ 128,265

McMillan LLP

| Invoice date | Invoice No. | Description | Subtotal | GST | Total |
|---------------------|--------------------|---|-----------------|------------|--------------|
| February 16, 2023 | 3017826 | For the period ended January 31, 2023 | \$ 7,458 | \$ 663 | \$ 8,121 |
| March 9, 2023 | 3017919 | For the period ended February 28, 2023 | 13,295 | 299 | 13,594 |
| April 12, 2023 | 3018059 | For the period ended March 31, 2023 | 6,039 | 309 | 6,348 |
| May 10, 2023 | 3018224 | For the period ended April 30, 2023 | 6,198 | 188 | 6,386 |
| May 31, 2023 | 3018308 | For the period ended May 31, 2023 | 3,770 | 466 | 4,236 |
| July 26, 2023 | 3018583 | For the period ended June 30, 2023 | 9,342 | 466 | 9,809 |
| July 31, 2023 | 3018618 | For the period ended July 31, 2023 | 7,548 | 376 | 7,924 |
| September 12, 2023 | 3018858 | For the period ended August 31, 2023 | 1,714 | 104 | 1,818 |
| October 16, 2023 | 3019026 | For the period ended September 30, 2023 | 2,182 | 133 | 2,314 |
| November 9, 2023 | 3019260 | For the period ended October 31, 2023 | 2,658 | 219 | 2,877 |
| December 11, 2023 | 3019483 | For the period ended November 30, 2023 | 4,373 | 216 | 4,589 |
| December 31, 2023 | 3019756 | For the period ended December 31, 2023 | 4,359 | 75 | 4,434 |
| February 7, 2024 | 3019877 | For the period ended January 31, 2024 | 1,501 | 30 | 1,531 |
| March 12, 2024 | 3020073 | For the period ended February 29, 2024 | 596 | 18 | 614 |
| April 10, 2024 | 3020254 | For the period ended March 31, 2024 | 362 | 5,547 | 5,908 |
| May 7, 2024 | | For the period ended April 30, 2024 | 532 | 27 | 559 |
| | | | 71,926 | 9,135 | 81,061 |

Unpaid professional fees related to Jovica Interrogatories (invoice 3018583)

6,331 317 6,648

Estimated fees to complete the administration of the receivership

10,000 500 10,500

Total estimated fees of McMillan LLP

\$ 88,257 \$ 9,951 \$ 98,209

Total Professional Fees and Disbursements

\$ 210,158 \$ 16,316 \$ 226,474

SCHEDULE 6

**In the Matter of the Receivership of
985842 Alberta Ltd.**

**Summary of Professional Fees and Disbursements for the Period From January 1, 2023 to April 30, 2024 Including Estimates to Complete the
Administration of the Receivership**

MNP Ltd.

| Invoice date | Invoice number | Description | Subtotal | GST | Total |
|---------------------|-----------------------|--|-----------------|--------------|---------------|
| February 21, 2023 | 10792355 | for the period ended January 31, 2023 | \$ 23,907 | \$ 1,195 | \$ 25,103 |
| March 13, 2023 | 10836421 | For the period ended February 28, 2023 | 15,807 | 790 | 16,597 |
| April 24, 2023 | 10961755 | For the period ended March 31, 2023 | 3,231 | 162 | 3,393 |
| May 11, 2023 | 11026926 | For the period ended April 30, 2023 | 4,461 | 223 | 4,684 |
| June 6, 2023 | 11083075 | For the period ended May 31, 2023 | 6,449 | 322 | 6,771 |
| July 25, 2023 | 11148398 | For the period ended June 30, 2023 | 4,955 | 248 | 5,203 |
| August 1, 2023 | 11169089 | For the period ended July 31, 2023 | 10,451 | 523 | 10,974 |
| September 6, 2023 | 11213307 | For the period ended August 31, 2023 | 2,282 | 114 | 2,396 |
| October 10, 2023 | 11257016 | For the period ended September 30,2023 | 1,578 | 79 | 1,657 |
| November 6, 2023 | 11299407 | For the period ended October 31, 2023 | 336 | 17 | 353 |
| January 3, 2024 | 11382988 | For the period ended December 31, 2023 (Nov-Dec) | 3,717 | 186 | 3,903 |
| February 12, 2024 | 11439664 | For the period ended January 31, 2024 | 819 | 41 | 860 |
| March 28, 2024 | 11544840 | For the period ended February 29, 2024 | 456 | 23 | 479 |
| May 7, 2024 | 11699453 | For the period ended April 30, 2024 | 1,207 | 60 | 1,267 |
| | | | <u>79,656</u> | <u>3,983</u> | <u>83,639</u> |

Estimated fees to complete the administration of the receivership 15,000 750 15,750

Total estimated fees of MNP Ltd. \$ 94,656 \$ 4,733 \$ 99,389

McMillan LLP

| Invoice date | Invoice number | Description | Subtotal | GST | Total |
|---------------------|-----------------------|---|-----------------|---------------|----------------|
| February 16, 2023 | 3017826 | For the period ended January 31, 2023 | \$ 35,160 | \$ 1,658 | \$ 36,817 |
| March 9, 2023 | 3017919 | For the period ended February 28, 2023 | 33,238 | 492 | 33,729 |
| April 12, 2023 | 3018059 | For the period ended March 31, 2023 | 9,947 | 427 | 10,374 |
| May 10, 2023 | 3018224 | For the period ended April 30, 2023 | 8,559 | 530 | 9,088 |
| May 31, 2023 | 3018308 | For the period ended May 31, 2023 | 10,624 | 681 | 11,306 |
| July 26, 2023 | 3018583 | For the period ended June 30, 2023 | 13,653 | 681 | 14,334 |
| July 31, 2023 | 3018618 | For the period ended July 31, 2023 | 15,691 | 782 | 16,473 |
| September 12, 2023 | 3018858 | For the period ended August 31, 2023 | 2,389 | 84 | 2,473 |
| October 16 2023 | 3019026 | For the period ended September 30, 2023 | 1,766 | 181 | 1,946 |
| November 9, 2023 | 3019260 | For the period ended October 31, 2023 | 3,621 | 219 | 3,839 |
| December 11 2023 | 3019483 | For the period ended November 30, 2023 | 4,373 | 216 | 4,589 |
| December 31, 2023 | 3019756 | For the period ended December 31, 2023 | 4,359 | 24 | 4,383 |
| February 7, 2024 | 3019877 | For the period ended January 31, 2024 | 477 | 30 | 507 |
| March 12, 2024 | 3020073 | For the period ended February 29, 2024 | 596 | 18 | 614 |
| April 10, 2024 | 3020254 | For the period ended March 31, 2024 | 362 | 8,990 | 9,352 |
| May 7, 2024 | 3020455 | For the period ended April 30, 2024 | 532 | 27 | 559 |
| | | | <u>145,345</u> | <u>15,038</u> | <u>160,383</u> |

Unpaid professional fees related to Jovica Interrogatories (invoice 3018583) 6,331 317 6,648

Estimated fees to complete the administration of the receivership 10,000 500 10,500

Total estimated fees of McMillan LLP \$ 161,676 \$ 15,855 \$ 177,530

Total Professional Fees and Disbursements \$ 256,332 \$ 20,588 \$ 276,920