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COURT FILE NUMBER 2203 12557

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE EDMONTON

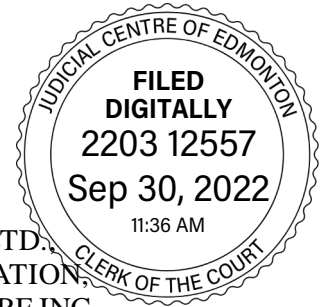
PLAINTIFF ROYAL BANK OF CANADA

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

DOCUMENT **ORDER (ADVICE AND DIRECTION)**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT McMillan LLP  
TD Canada Trust Tower  
1700, 421 – 7<sup>th</sup> Avenue SW  
Calgary, AB T2P 4K9

**Attention: Adam Maerov/Kourtney Rylands/Preet Saini**  
Telephone: 403.531.4700  
Fax: 403.531.4720  
File No. 293571



**DATE ON WHICH ORDER WAS PRONOUNCED:** September 29, 2022

**NAME OF JUSTICE WHO MADE THIS ORDER:** The Honourable Justice D.R. Mah

**LOCATION OF HEARING:** Edmonton Courts Centre

**UPON THE APPLICATION** of MNP Ltd., in its capacity as court-appointed receiver and manager (the “**Receiver**”) of Faissal Mouhamad Professional Corporation, 52 Dental Corporation, Delta Dental Corp., Michael Dave Management Ltd. and 52 Wellness Centre Inc. (collectively, the “**Debtors**”); AND UPON reviewing the First Report of the Interim Receiver dated September 9, 2022 and the First Report of the Receiver dated September 29, 2022; AND UPON reviewing the receivership order granted by the Honourable Justice Mah on September 16, 2022 (the “**Receivership Order**”); AND UPON noting paragraph 31 of the Receivership Order permits the Receiver to apply to this Court for advice and directions in the discharge of its powers and duties; AND UPON reviewing the Affidavit of Service

confirming service on the service list contained therein (“**Service List**”); AND UPON hearing counsel for the Receiver and any other interested parties present;

**IT IS HEREBY ORDERED THAT:**

1. Capitalized terms used but not defined herein have the meanings given to such terms in the Receivership Order.
2. The time for service of the notice of application for this order (the “**Order**”) is hereby abridged and deemed good and sufficient and this application is properly returnable today.
3. Any party on the Service List as of September 29, 2022 may apply on notice to the Receiver and other parties on the Service List to vary this Order within 7 days after the date on which the Order is pronounced.
4. Paragraph 8 of the Receivership Order shall apply to Faissal Mouhamad and Fetoun Ahmad also known as Fetoun Ahmed (or anyone acting on their behalf) in each of their personal capacities in addition to their capacities as agents of the Debtors.
5. No Person (as defined in the Receivership Order) shall knowingly participate in, or facilitate, any breach of the Receivership Order or this Order, including without limitation, any breach of paragraph 8 of the Receivership Order.
6. Faissal Mouhamad is enjoined by paragraphs 8 and 9 of the Receivership Order, and this Order, from taking any of the following actions without the prior written consent of the Receiver:
  - a. soliciting or contacting staff or patients at the Debtors’ dental practices, including those located at 7151 50th Avenue in Red Deer, Alberta and 100, 3505 52nd Street SE, Calgary, Alberta (collectively, the “**Dental Clinics**”); and
  - b. entering the Dental Clinics or in any way dealing with the Property, other than the Controlled Substances (as defined in the Receivership Order).

7. Faissal Mouhamad is hereby directed to comply with paragraphs 4 to 6 of the Receivership Order, including by taking the following steps:
- a. providing the Receiver with a sworn Affidavit that includes a list of all Records or Property that either he, Fetoun Ahmad also known as Fetoun Ahmed or someone acting on their behalf have removed from the Dental Clinics during the period commencing August 1, 2022 to the date of this Order by no later than Monday October 3, 2022;
  - b. advising the Receiver forthwith of any Records or Property (as such terms are defined in the Receivership Order) that are or may be in the possession or control of Faissal Mouhamad and delivering all such Records and Property to the Receiver forthwith, including without limitation any Records or Property taken from any Clinic, provided that Faissal Mouhamad shall continue to remain in possession of any Controlled Substances in accordance with the Receivership Order;
  - c. cooperating with and assisting the Receiver by delivering and granting to the Receiver access to and possession of all Patient Records; and
  - d. preserving and not destroying, altering, deleting or modifying in any manner any Records or Patient Records in the possession or control of Faissal Mouhamad.
8. The Receiver is hereby authorized but not required to take reasonable steps to secure and dispose of any Controlled Substances of the Debtors or otherwise located at the Dental Clinics, and the Receiver shall not by reason of having taken such steps or any other reason be in possession or be deemed to be in possession of any such Controlled Substances.
9. The Receiver is awarded costs of this application against Faissal Mouhamad.



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Justice of the Court of King's Bench