

Clerk's stamp:

COURT FILE NUMBER 2301-03023
COURT COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY
PLAINTIFF OTERA CAPITAL INC.
DEFENDANTS PLAZA 1000 LTD.

C31572



DOCUMENT

AFFIDAVIT OF SERVICE

ADDRESS FOR SERVICE AND CONTACT
INFORMATION OF PARTY FILING THIS
DOCUMENT

Gowling WLG (Canada) LLP
421 7 Ave SW Suite 1600
Calgary, AB T2P 4K9
Attn: Sam Gabor
Ph. 1 403 298 1946
File No.: A170537

COM
March 17, 2023



AFFIDAVIT OF SERVICE OF KRISTY DEIURE

Sworn on March 15, 2023

I, **KRISTY DEIURE**, of the City of Calgary, in the Province of Alberta, **SWEAR AND SAY THAT**:

1. I am employed as a Legal Assistant by Gowling WLG (Canada) LLP ("**Gowlings**"), counsel to the Plaintiff, Otera Capital Inc. ("**Otera**") and as such have personal knowledge of the matters deposed to. Where that knowledge is based on information or belief, I have stated the source of that information and verily believe it to be true.
2. On March 6, 2023 I served the following unfiled documents by TitanFile e-mail chain on the Service List (the "**Service List**"):
 - a) Statement of Claim;
 - b) Application returnable March 17, 2023;
 - c) Affidavit of Jocelyn Dufort, sworn March 6, 2023; and
 - d) the Consent to Act as Receiver of MNP Ltd.

under cover of a service letter addressed to the Service List (the "**March 6, 2023 Service Letter**") dated March 6, 2023 (collectively, the "**Package**").

3. Attached hereto and marked as **Exhibit "A"** is a copy of the March 6, 2023 Service Letter and the Service List.
4. Attached hereto and marked as **Exhibit "B"** is a copy of the covering e-mail dated March 6, 2023, noting those on the Service List who were sent the Package.
5. I am informed by Ingrid Fitzner of Gowlings and do verily believe that on March 6, 2023 the Package was served by Canada Post Expedited Parcel Mail upon The Government of Canada at their following address for service:

His Majesty The King In Right Of Canada
Minister of Public Works and Government Services Canada Real Property Services
10 Floor Canada Place
9700 Jasper Ave
Edmonton, Alberta T5J 4C3


6. Attached here to and marked as **Exhibit "C"** is a copy of the Canada Post Expedited Parcel Mail receipt and delivery confirmation for service of the Package on The Government of Canada.
7. On March 7, 2023 filed copies of the documents in the Package referenced in paragraph 2 (a-d) above were returned from the Court.
8. I am informed by Ingrid Fitzner of Gowlings and do verily believe that on March 9, 2023 filed copies of following documents were served on Nova Chemicals Corporation ("**Nova**"), under cover of a service letter (the "**March 9, 2023 Service Letter**") by courier, to their head office located at, 2100, 250 5 Street SW, West Tower Calgary, Alberta Canada T2P 0R4:
 - a) Service List (the "**March 9, 2023 Service List**");
 - b) Statement of Claim;
 - c) Application;
 - d) Affidavit of Jocelyn Dufort, sworn March 6, 2023; and
 - e) the Consent to Act as Receiver of MNP Ltd.
9. Attached hereto and marked as **Exhibit "D"** is a copy of the March 9, 2023 Service Letter and March 9, 2023 Service List.
10. Attached hereto and marked as **Exhibit "E"** are copies of the delivery confirmations for the March 9, 2023 Service Letter and referenced enclosures.
11. On Monday, March 13, 2023 I served via TitanFile e-mail channel to the service list (the "**March 13, 2023 Service List**") copies of the following documents:
 - a) The filed cover pages of:
 - (i) the Statement of Claim filed March 7, 2023;
 - (ii) the Application returnable March 17, 2023;
 - (iii) the Affidavit of Jocelyn Dufort sworn March 6, 2023 and filed March 7, 2023; and

- (iv) the Consent to Act as Receiver of MNP Ltd. filed March 7, 2023.
- b) the unfiled Brief and Book of Authorities of the Applicant Otera Capital Inc.; and
- c) the unfiled Supplemental Affidavit of K. Delure sworn on March 7, 2023.


under cover of a service letter addressed to the service list (the "**March 13, 2023 Service Letter**") dated March 13, 2023 (collectively, the "**March 13, 2023 Package**").

- 12. Attached hereto and marked as **Exhibit "F"** is a copy of the March 13 Service List and March 13, 2023 Service Letter.
- 13. Attached hereto and marked as **Exhibit "G"** is a copy of the covering e-mail dated March 13, 2023, noting those on the Service List who were sent the March 13 2023 Package.
- 14. On March 14, 2023 I served the March 13, 2023 Package by registered mail upon The Government of Canada at their address for service set out in paragraph 5 above.
- 15. Attached here to and marked as **Exhibit "H"** is a copy of the registered mail receipt and delivery confirmation for service of the March 13, 2023 Package on The Government of Canada.
- 16. On March 14, 2023 I served the March 13, 2023 Package on Nova by courier to their head office located at, 2100, 250 5 Street SW, West Tower Calgary, Alberta Canada T2P 0R4.
- 17. Attached hereto and marked as **Exhibit "I"** are copies of the delivery confirmations for service of the March 13, 2023 Package on Nova.
- 18. I make this Affidavit in support of effect of service and for no improper reason.

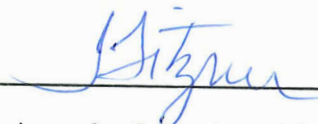
SWORN BEFORE ME at Calgary, Alberta, this)
 15th day of March, 2023.)


 _____)
 A Commissioner of Oaths in and for the)
 Province of Alberta)

INGRID FITZNER
 A Commissioner for Oaths in and for
 the Province of Alberta
 My Commission Expires January 28, 2025


 _____)
KRISTY DEIURE)

This is **Exhibit "A"** referred to in the Affidavit of
Kristy Delure, Sworn before me this 15th Day of March 2023



A Commissioner for Oaths in and for the Province of Alberta

INGRID FITZNER
A Commissioner for Oaths in and for
the Province of Alberta
My Commission Expires January 28, 2025



March 6, 2023

Via E-Mail

Sam Gabor
Direct +1 403 298 1946
Direct Fax +1 403 263 9193
Sam.Gabor@gowlingwlg.com
File no. A170537

Service List (Attached)

Dear Sir/Mesdames:

Re: Otera Capital Inc. v. Plaza 1000 Ltd.
Application Before the Honourable Justice Johnson March 17, 2023 3:00 p.m. MST

We are counsel to Otera Capital Inc. in the above-mentioned proceedings. Please find enclosed for service upon you via Titanfile link the following unfiled documents:

1. Statement of Claim;
2. Application returnable March 17, 2023 at 3:00 pm via Webex videoconference (the "**Application**");
3. The Affidavit of Jocelyn Dufort, sworn March 6, 2023.; and
4. The consent to Act as Receiver of MNP Ltd.

(collectively, the "**Documents**")

Please be advised that the Documents have been sent for filing, but filed copies have not yet been returned by the Court. Proof of filing of the same will be provided in due course. Webex instructions to attend the Application can be found at Appendix "1" to the same. Please also be advised that we intend to file a brief of law in support of the Application which will be filed and served in due course.

Should you have any questions regarding the foregoing please contact me.

Yours truly,

Gowling WLG (Canada) LLP

DocuSigned by:
Sam Gabor
6D7F375C8FC044B...
Sam Gabor

SG:kld
Enclosures (5)

Gowling WLG (Canada) LLP
Suite 1600, 421 7th Avenue SW
Calgary AB T2P 4K9 Canada

T +1 403 298 1000
F +1 403 263 9193
gowlingwlg.com

Gowling WLG (Canada) LLP is a member of Gowling WLG, an international law firm which consists of independent and autonomous entities providing services around the world. Our structure is explained in more detail at gowlingwlg.com/legal.

COURT FILE NUMBER

COURT

COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE

CALGARY

PLAINTIFF

OTERA CAPITAL INC.

DEFENDANT

PLAZA 1000 LTD.

DOCUMENT

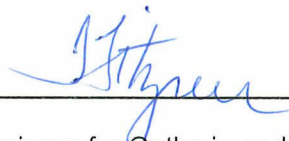
SERVICE LIST

UPDATED: MARCH 6, 2023

<u>Service Recipient</u>	<u>Recipient Status</u>	<u>Method of Service</u>
Gowling WLG (Canada) LLP 1600 – 421, 7 th Avenue SW Calgary, AB T2P 4K9 Attn: Sam Gabor and Beth Burton Email: sam.gabor@gowlingwlg.com / elizabethburton@gowlingwlg.com	Counsel for Otera Capital Inc.	Email
MNP LTD 1500, 640 - 5th Avenue SW Calgary, AB T2P 3G4 Attn: Victor Kroeger and Rick Anderson Emails: vic.kroeger@mnp.ca rick.anderson@mnp.ca	Proposed Receiver	Email
Burnet Duckworth & Palmer #2400, 525 - 8th Ave SW Calgary, AB T2P 1G1 Attn: David Legeyt Email: dlegeyt@bdplaw.com	Counsel to the Proposed Receiver	Email
Plaza 1000 Ltd. c/o Copez Properties Ltd. 130, 707 - 10 Avenue SW Calgary, AB T2R 0B3 Attn: Robert Proud Email: rproud@copez.com	Debtor	Email

<p>Stikeman Elliott LLP 4300 Bankers Hall West 888 - 3rd Street S.W. Calgary, AB T2P 5C5 Canada</p> <p>Attn: Karen Fellowes, KC Email: kfellowes@stikeman.com</p>	<p>Counsel to the Debtor</p>	<p>Email</p>
<p>255848 Alberta Ltd. c/o Copez Properties Ltd. Suite 130, 707 - 10 Avenue SW Calgary, Alberta T2R 0B3</p> <p>Attn: Robert Proud Email: rproud@copez.com</p>	<p>Mortgagee</p>	<p>Email</p>
<p>His Majesty The King In Right Of Canada Minister of Public Works and Government Services Canada Real Property Services 10 Floor Canada Place 9700 Jasper Ave Edmonton, Alberta T5J 4C3</p> <p>Attn: Christie Koch Email: N/A</p>	<p>Caveator</p>	<p>Registered Mail</p>

This is **Exhibit "B"** referred to in the Affidavit of
Kristy Delure, Sworn before me this 15th Day of March 2023



A Commissioner for Oaths in and for the Province of Alberta

INGRID FITZNER
A Commissioner for Oaths in and for
the Province of Alberta
My Commission Expires January 28, 2025

Delure, Kristy

From: Kristy.Delure@ca.gowlingwlg.com
Sent: March 6, 2023 3:25 PM
To: vic.kroeger@mnp.ca; rick.anderson@mnp.ca; dlegeyt@bdplaw.com; rproud@copez.com; kfellowes@stikeman.com
Cc: Gabor, Sam; Burton, Elizabeth; Kroeger, Stephen; Zeineddine, Samah
Subject: Otera Capital Inc. v Plaza 1000 Ltd. - Application Before The Honourable Justice Johnson - March 17, 2023 - 3:00 p.m. Mountain Time - Calgary Courts Centre, Calgary, Alberta - VIA WEBEX Link
Attachments: 2023 - 03 - 06 - LT to Service List (SOC, NOA, AFF and Consent).pdf; 2023 - 03 - 06 - Service List.pdf; OTERA CAPITAL INC. v PLAZA 1000 LTD. - UNFILED - 2023-03-06 - STATEMENT OF CLAIM.pdf; OTERA CAPITAL INC v. PLAZA 1000 Ltd. - UNFILED - 2023-03-06 - APPLICATION.pdf; OTERA CAPITAL INC v. PLAZA 1000 Ltd. - UNFILED - 2023-03-06 - AFFIDAVIT OF JOCELYN DUFORT (SWORN MARCH 6, 2023).pdf; OTERA CAPITAL INC v. PLAZA 1000 Ltd. - UNFILED - 2023-03-06 - CONSENT TO ACT AS RECEIVER.pdf
Follow Up Flag: Follow up
Flag Status: Completed

Good afternoon,

Attached please find our service correspondence of today's date, in connection with the above-noted matter, on behalf of Sam Gabor.

We trust you will find the attached to be in order; however, should you have any questions or concerns please do not hesitate to contact our office.

Regards.

Kristy Delure
Legal Administrative Assistant
T +1 403 298 1843
kristy.deiure@gowlingwlg.com

Assistant To: Thomas Cumming
T +1 403 298 1938
tom.cumming@gowlingwlg.com

Assistant To: Sam Gabor
T +1 403 298 1946
sam.gabor@gowlingwlg.com



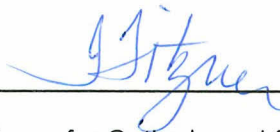
Gowling WLG (Canada) LLP
Suite 1600, 421 7th Avenue SW
Calgary AB T2P 4K9
Canada



gowlingwlg.com

Gowling WLG | 1,500+ legal professionals worldwide

This is **Exhibit "C"** referred to in the Affidavit of
Kristy Delure, Sworn before me this 15th Day of March 2023



A Commissioner for Oaths in and for the Province of Alberta

INGRID FITZNER
A Commissioner for Oaths in and for
the Province of Alberta
My Commission Expires January 28, 2025



Date: 2023/03/14

Dear Sir or Madam

Please find below the scanned delivery date and signature of the recipient of the item identified below:

Item Number 2339323513007650

Product Name Not Available

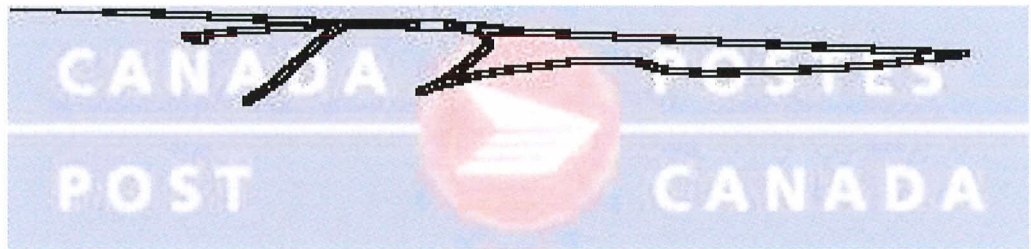
Reference Number 1 Not Applicable

Reference Number 2 Not Applicable

Delivery Date (yyyy/mm/dd) 2023-03-07

Signatory Name THADEUS S

Signature



Yours sincerely,

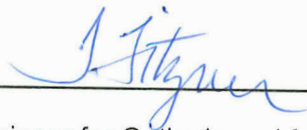
Customer Relationship Network

1-888-550-6333.

(From outside Canada 1 416 979-3033)

This copy confirms to the delivery date and signature of the individual who accepted and signed for the item in question. This information has been extracted from the Canadapost data warehouse

This is **Exhibit "D"** referred to in the Affidavit of
Kristy Delure, Sworn before me this 15th Day of March 2023



A Commissioner for Oaths in and for the Province of Alberta

INGRID FITZNER
A Commissioner for Oaths in and for
the Province of Alberta
My Commission Expires January 28, 2025



March 9, 2023

Via Courier

Sam Gabor
Direct +1 403 298 1946
Direct Fax +1 403 263 9193
Sam.Gabor@gowlingwlg.com
File no. A170537

Nova Chemicals Corporation
c/o Head Office
2100, 250 5 Street SW
West Tower
Calgary, Alberta
Canada T2P 0R4

Attention: Nimish Rathod, VP and Larry Anderson, AGC

Dear Sirs:

**Re: Court of King's Bench of Alberta Action No. 2301-03023
Otera Capital Inc. v. Plaza 1000 Ltd.
Application Before the Honourable Justice Johnson March 17, 2023 3:00 p.m. MST**

We are counsel to Otera Capital Inc. in the above-mentioned proceedings. Please find enclosed for service upon you the following documents:

1. A copy of the service list for the above-mentioned action;
2. Statement of Claim filed March 7, 2023;
3. Application returnable March 17, 2023 at 3:00 pm via Webex videoconference (the "**Application**") filed March 7, 2023;
4. The Affidavit of Jocelyn Dufort, sworn March 6, 2023 and filed March 7, 2023; and
5. The consent to Act as Receiver of MNP Ltd. Filed March 7, 2023

(collectively, the "**Documents**").

Webex instructions to attend the Application can be found at Appendix "1" to the Application. Please also be advised that we intend to file a brief of law in support of the Application which will be filed and served in due course.

Kindly provide my assistant, Kristy Delure at kristy.deiure@gowlingwlg.com with an e-mail address for service of future documents.

Gowling WLG (Canada) LLP
Suite 1600, 421 7th Avenue SW
Calgary AB T2P 4K9 Canada

T +1 403 298 1000
F +1 403 263 9193
gowlingwlg.com

Gowling WLG (Canada) LLP is a member of Gowling WLG, an international law firm which consists of independent and autonomous entities providing services around the world. Our structure is explained in more detail at gowlingwlg.com/legal.

55808414\1



We trust you will find the enclosed to be in order; however, should you have any questions regarding the foregoing please contact me

Yours truly,

Gowling WLG (Canada) LLP

DocuSigned by:
Stephen Kroeger
827D2F8D121546D...

For: Sam Gabor

SG:kld
Enclosures (5)

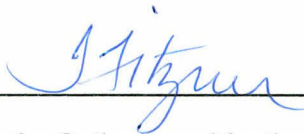
COURT FILE NUMBER	2301-03023
COURT	COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE	CALGARY
PLAINTIFF	OTERA CAPITAL INC.
DEFENDANT	PLAZA 1000 LTD.
DOCUMENT	<u>SERVICE LIST</u>
GOWLING WLG (CANADA) LLP MATTER NUMBER	A170537

UPDATED: MARCH 9, 2023

<u>Service Recipient</u>	<u>Recipient Status</u>	<u>Method of Service</u>
Gowling WLG (Canada) LLP 1600 – 421, 7 th Avenue SW Calgary, AB T2P 4K9 Attn: Sam Gabor and Beth Burton Email: sam.gabor@gowlingwlg.com / elizabethburton@gowlingwlg.com	Counsel for Otera Capital Inc.	Email
MNP LTD 1500, 640 - 5th Avenue SW Calgary, AB T2P 3G4 Attn: Victor Kroeger and Rick Anderson Emails: vic.kroeger@mnp.ca rick.anderson@mnp.ca	Proposed Receiver	Email
Burnet Duckworth & Palmer #2400, 525 - 8th Ave SW Calgary, AB T2P 1G1 Attn: David Legeyt Email: dlegeyt@bdplaw.com	Counsel to the Proposed Receiver	Email

Plaza 1000 Ltd. c/o Copez Properties Ltd. 130, 707 - 10 Avenue SW Calgary, AB T2R 0B3 Attn: Robert Proud Email: rproud@copez.com	Debtor	Email
Stikeman Elliott LLP 4300 Bankers Hall West 888 - 3rd Street S.W. Calgary, AB T2P 5C5 Canada Attn: Karen Fellowes, KC Email: kfellowes@stikeman.com	Counsel to the Debtor	Email
255848 Alberta Ltd. c/o Copez Properties Ltd. Suite 130, 707 - 10 Avenue SW Calgary, Alberta T2R 0B3 Attn: Robert Proud Email: rproud@copez.com	Mortgagee	Email
His Majesty The King In Right Of Canada Minister of Public Works and Government Services Canada Real Property Services 10 Floor Canada Place 9700 Jasper Ave Edmonton, Alberta T5J 4C3 Attn: Christie Koch Email: N/A	Caveator	Registered Mail
Nova Chemicals Corporation c/o Head Office 2100, 250 5 Street SW West Tower Calgary, Alberta Canada T2P 0R4 Attn: Nimish Rathod and Larry Anderson Emails: N/A	Former Tenant	Courier

This is **Exhibit "E"** referred to in the Affidavit of
Kristy Delure, Sworn before me this 15th Day of March 2023



A Commissioner for Oaths in and for the Province of Alberta

INGRID FITZNER
A Commissioner for Oaths in and for
the Province of Alberta
My Commission Expires January 28, 2025

Delure, Kristy

From: Fitzner, Ingrid
Sent: March 9, 2023 1:13 PM
To: Delure, Kristy
Subject: FW: Delivery confirmation for job 14004025

From: Notification <notification@directitgroup.ca>
Sent: March-09-23 1:07 PM
To: Fitzner, Ingrid <Ingrid.Fitzner@ca.gowlingwlg.com>
Subject: Delivery confirmation for job 14004025

This message originated from outside of Gowling WLG. - Ce message provient de l'extérieur de Gowling WLG.



Delivery Confirmation

Package Type	Package	Quantity	1 piece
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 GOWLING WLG (Canada) LLP 1400- Att Photo Of Courier Label, 421 7 Ave SW	 NOVA Chemicals Corporation C/O HEAD OFFI 2100, 250 5 Street SW
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<="">

Reference **A170537/S.GABOR**

Delivered at **2023-03-09 - 13:06**
Mountain Standard Time

Signed By

Rebecca

see tracking link for up-to-date information and
any media attachments

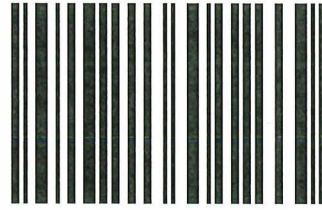
TRACK ORDER
TR7650614004025



Direct It Group of companies. Please do not reply to this email.
Email inquiries can be sent to csr@directitgroup.ca



DIRECT·IT GROUP **COURIER**



14004025

#14004025

Status	Invoiced
Location	Delivered
Your Name & Phone	AMINA
Call In	03-09 11:24AM
Due by	03-09 13:29PM
Delivered	03-09 13:06PM
Service Minutes	120
Proof of Delivery	Rebecca
Signature	Trip Delivered

No Live Tracking Available



TrackingNo

TR7650614004025

Copy into Clipboard

<https://ship.directx.ca/#/TrackNo/TR7650614004025>

From GOWLING WLG (Canada) LLP
From Address 1400- Att Photo Of Courier Label,421 7 Ave,SW, Calgary, AB, Ca
To NOVA Chemicals Corporation C/O HEAD OFFI
To Address 2100,250 5 Street,SW, Calgary, Alberta,Canada
Pieces 1
Weight 4 lbs
Service Type C
Instructions *NSR*
Third party Tracking

Created	Accepted	Picked Up	Delivered
03-09 11:24	by driver 896 @ 03-09 11:25	by driver 896 @ 03-09 12:33	signed by "Rebecca" @ 03-09 13:06

PH: (403)-264-6666 - csr@directitgroup.ca (<mailto:csr@directitgroup.ca>)

Delure, Kristy

From: Fitzner, Ingrid
Sent: March 9, 2023 1:13 PM
To: Delure, Kristy
Subject: FW: Delivery confirmation for job 14004032

From: Notification <notification@directitgroup.ca>
Sent: March-09-23 1:07 PM
To: Fitzner, Ingrid <Ingrid.Fitzner@ca.gowlingwlg.com>
Subject: Delivery confirmation for job 14004032

This message originated from outside of Gowling WLG. - Ce message provient de l'extérieur de Gowling WLG.



Delivery Confirmation

Package Type	Package	Quantity	1 piece
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 GOWLING WLG (Canada) LLP 1400- Att Photo Of Courier Label, 421 7 Ave SW	 NOVA CHEMICAL CORP. C/O HEAD OFFICE 2100, 250 5 St SW
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<="">

Reference **A170537/S.GABOR**

Delivered at **2023-03-09 - 13:06**
Mountain Standard Time

Signed By

Rebecca

see tracking link for up-to-date information and
any media attachments

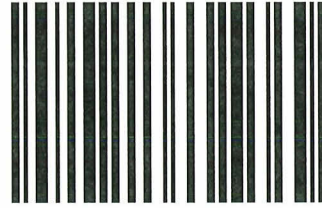
TRACK ORDER
TR1750614004032



Direct It Group of companies. Please do not reply to this email.
Email inquiries can be sent to csr@directitgroup.ca



DIRECT·IT GROUP **COURIER**

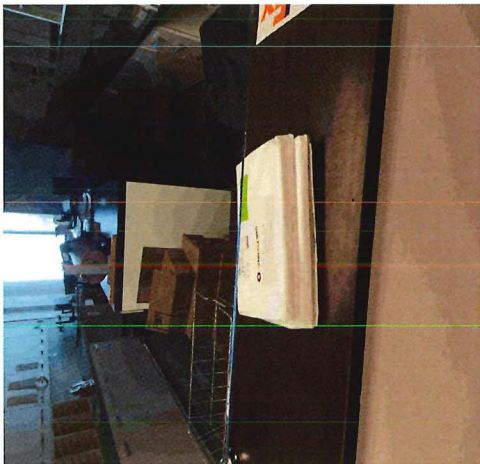


14004032

#14004032

Status	Invoiced
Location	Delivered
Your Name & Phone	AMINA
Call In	03-09 11:26AM
Due by	03-09 13:31PM
Delivered	03-09 13:06PM
Service Minutes	120
Proof of Delivery	Rebecca
Signature	Trip Delivered

No Live Tracking Available



TrackingNo

TR1750614004032

Copy into Clipboard

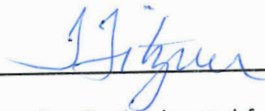
<https://ship.directx.ca/#!/TrackNo/TR1750614004032>

From GOWLING WLG (Canada) LLP
From Address 1400- Att Photo Of Courier Label,421 7 Ave,SW, Calgary, AB, Ca
To NOVA CHEMICAL CORP. C/O HEAD OFFICE
To Address 2100,250 5 St,SW, Calgary, AB,Canada
Pieces 1
Weight 4 lbs
Service Type C
Instructions *NSR*
Third party Tracking

Created	Accepted	Picked Up	Delivered
03-09 11:26	by driver 896 @ 03-09 11:29	by driver 896 @ 03-09 12:34	signed by "Rebecca" @ 03-09 13:06

PH: (403)-264-6666 - csr@directitgroup.ca (<mailto:csr@directitgroup.ca>)

This is **Exhibit "F"** referred to in the Affidavit of
Kristy Delure, Sworn before me this 15th Day of March 2023



A Commissioner for Oaths in and for the Province of Alberta

INGRID FITZNER
A Commissioner for Oaths in and for
the Province of Alberta
My Commission Expires January 28, 2025

March 13, 2023

Sam Gabor
Direct +1 403 298 1946
Direct Fax +1 403 263 9193
Sam.Gabor@gowlingwlg.com
File no. A170537

Via E-Mail

Service List (Attached)

Dear Sir/Mesdames:

Re: Otera Capital Inc. v. Plaza 1000 Ltd.
Application Before the Honourable Justice Johnson March 17, 2023 3:00 p.m. MST

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1. The filed cover pages of the following documents:
 - (a) the Statement of Claim filed March 7, 2023;
 - (b) the Application returnable March 17, 2023;
 - (c) the Affidavit of Jocelyn Dufort sworn March 6, 2023 and filed March 7, 2023; and
 - (d) the Consent to Act as Receiver of MNP Ltd. filed March 7, 2023.
2. the Brief and Authorities of the Applicants Otera Capital Inc.; and
3. the Supplemental Affidavit of K. Delure sworn on March 7, 2023.

Please be advised that the documents in items 2 and 3 above have been sent for filing, but filed copies have not yet been returned by the Court. Proof of filing of the same will be provided in due course.

Should you have any questions regarding the foregoing please contact me.

Yours truly,

Gowling WLG (Canada) LLP

Sam Gabor
SG:kld
Enclosures (7)

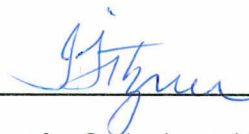
COURT FILE NUMBER	2301-03023
COURT	COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE	CALGARY
PLAINTIFF	OTERA CAPITAL INC.
DEFENDANT	PLAZA 1000 LTD.
DOCUMENT	<u>SERVICE LIST</u>
GOWLING WLG (CANADA) LLP MATTER NUMBER	A170537

UPDATED: MARCH 13, 2023

<u>Service Recipient</u>	<u>Recipient Status</u>	<u>Method of Service</u>
Gowling WLG (Canada) LLP 1600 – 421, 7 th Avenue SW Calgary, AB T2P 4K9 Attn: Sam Gabor and Beth Burton Email: sam.gabor@gowlingwlg.com / elizabethburton@gowlingwlg.com	Counsel for Otera Capital Inc.	Email
MNP LTD 1500, 640 - 5th Avenue SW Calgary, AB T2P 3G4 Attn: Victor Kroeger and Rick Anderson Emails: vic.kroeger@mnp.ca rick.anderson@mnp.ca	Proposed Receiver	Email
Burnet Duckworth & Palmer #2400, 525 - 8th Ave SW Calgary, AB T2P 1G1 Attn: David Legeyt Email: dlegeyt@bdplaw.com	Counsel to the Proposed Receiver	Email

<p>Plaza 1000 Ltd. c/o Copez Properties Ltd. 130, 707 - 10 Avenue SW Calgary, AB T2R 0B3</p> <p>Attn: Robert Proud Email: rproud@copez.com</p>	Debtor	Email
<p>Stikeman Elliott LLP 4300 Bankers Hall West 888 - 3rd Street S.W. Calgary, AB T2P 5C5 Canada</p> <p>Attn: Karen Fellowes, KC Email: kfellowes@stikeman.com</p>	Counsel to the Debtor	Email
<p>255848 Alberta Ltd. c/o Copez Properties Ltd. Suite 130, 707 - 10 Avenue SW Calgary, Alberta T2R 0B3</p> <p>Attn: Robert Proud Email: rproud@copez.com</p>	Mortgagee	Email
<p>His Majesty The King In Right Of Canada Minister of Public Works and Government Services Canada Real Property Services 10 Floor Canada Place 9700 Jasper Ave Edmonton, Alberta T5J 4C3</p> <p>Attn: Christie Koch Email: N/A</p>	Caveator	Registered Mail
<p>Nova Chemicals Corporation c/o Head Office 2100, 250 5 Street SW West Tower Calgary, Alberta Canada T2P 0R4</p> <p>Attn: Nimish Rathod and Larry Anderson Emails: N/A</p>	Former Tenant	Courier

This is **Exhibit "G"** referred to in the Affidavit of
Kristy Delure, Sworn before me this 15th Day of March 2023



A Commissioner for Oaths in and for the Province of Alberta

INGRID FITZNER
A Commissioner for Oaths in and for
the Province of Alberta
My Commission Expires January 28, 2025

Delure, Kristy

From: Kristy Delure <Kristy.Delure@ca.gowlingwlg.com>
Sent: March 13, 2023 4:09 PM
To: Elizabeth Burton <elizabeth.burton@ca.gowlingwlg.com>; Rick Anderson <Rick.anderson@mnp.ca>; Sam Gabor <sam.gabor@ca.gowlingwlg.com>; Vic.kroeger@mnp.ca <vic.kroeger@mnp.ca>; Dlegeyt@bdplaw.com <dlegeyt@bdplaw.com>; Rproud@copez.com <rproud@copez.com>; Stephen Kroeger <Stephen.Kroeger@ca.gowlingwlg.com>; Kfellowes@stikeman.com <kfellowes@stikeman.com>; Samah Zeineddine <Samah.Zeineddine@ca.gowlingwlg.com>
Subject: Otera Capital Inc. v Plaza 1000 Ltd. - Application Before The Honourable Justice Johnson - March 17, 2023 - 3:00 p.m. Mountain Time - Calgary Courts Centre, Calgary, Alberta - VIA WEBEX Link
Attachments: 2023 - 03 - 13 - LT to Service List (Brief and Authorities and Supp Aff).pdf; 2023 - 03 - 13 - Service List.pdf; 2023 - 03 - 08 - Proof of Filing (Statement of Claim).pdf; 2023 - 03 - 08 - Proof of Filing (Application Returnable March 17, 2023).pdf; 2023 - 03 - 08 - Proof of Filing (Affidavit of J. Dufort Sworn March 6, 2023).pdf; 2023 - 03 - 08 - Proof of Filing (Consent to Act As Receiver).pdf; 2301-03023-Unfiled-2023-03-13-Brief and Authorities.pdf; 2301-03023-Unfiled-20230313-Supplemental Affidavit of K. Delure Sworn March 13, 2023.pdf

Good afternoon,

Attached please find our service correspondence of today's date, in connection with the above-noted matter, on behalf of Sam Gabor.

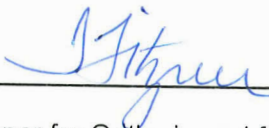
We trust you will find the attached to be in order; however, should you have any questions or concerns please do not hesitate to contact our office.

Regards.

--

This message has been sent and exported via TitanFile.

This is **Exhibit "H"** referred to in the Affidavit of
Kristy Delure, Sworn before me this 15th Day of March 2023



A Commissioner for Oaths in and for the Province of Alberta

INGRID FITZNER
A Commissioner for Oaths in and for
the Province of Alberta
My Commission Expires January 28, 2025

Canada Post Registered Mail Receipt

Sender:

Gowling WLG (Canada) LLP
Barristers & Solicitors
1600, 421 – 7th Avenue SW
Calgary, Alberta T2P 4K9

Date:

March 13th, 2023

Reference number:

A170537-

Sam Gabor

1.)

CANADA POST / POSTES CANADA

REGISTERED DOMESTIC / RECOMMANDÉ RÉGIME INTÉRIEUR

CUSTOMER RECEIPT / REÇU DU CLIENT

R

His Majesty the King in Right of Canada
Minister of Public Works and Government Services
Canada Real Property Services
10th Floor, Canada Place
9700 Jasper Avenue
Edmonton, AB T5J 4C3

FOR DELIVERY CONFIRMATION / CONFIRMATION DE LA LIVRAISON
canadapost.ca or/ou postescanada.ca
1 888 550-6333

Declared Value / Valeur déclarée: \$ 15.22

CPC Tracking Number / Numéro de repêrage de la SCP: RN 365 044 454 CA

33-086-584 (17-12)

Attention: Christie Koch

2.)

3.)



4.)

5.)

6.)




Date: 2023/03/15

Dear Sir or Madam:

Please find below the scanned delivery date and signature of the recipient of the item identified below:

Madame, Monsieur,

Vous trouverez ci-dessous la date de la livraison et la signature de la personne qui a accepté l'envoi sous mentionné:

Tracking Number	Numéro de repérage
RN365044454CA	
Product Name	Nom du produit
FSF ORIGINATING PREPAID FEE - REGISTERED / DR. FSF COUR. ORIG. PREPAYE - COUR. RE	
Reference Number 1	Numéro de référence 1
Not Applicable / Sans objet	
Reference Number 2	Numéro de référence 2
Not Applicable / Sans objet	
Delivery Date (yyyy/mm/dd)	Date de livraison (aaaa/mm/jj)
2023/03/15	
Signatory Name	Nom du signataire
THADEUS S	
Signature	Signature
	

Yours sincerely,

Customer Relationship Network
1-888-550-6333

(from outside of Canada 1 416-979-8822)

This copy confirms the delivery date and signature of the individual who accepted and signed for the item in question.

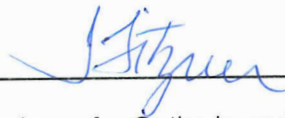
Salutations distinguées,

Réseau des relations avec la clientèle
1-888-550-6333

(de l'extérieur du Canada 1 416 979-8822)

Cette information confirme la date de livraison ainsi que la signature de la personne qui a accepté les envois sous mentionnés.

This is **Exhibit "I"** referred to in the Affidavit of
Kristy Delure, Sworn before me this 15th Day of March 2023



A Commissioner for Oaths in and for the Province of Alberta

INGRID FITZNER
A Commissioner for Oaths in and for
the Province of Alberta
My Commission Expires January 28, 2025

Delure, Kristy



From: Notification <notification@directitgroup.ca>
Sent: March 14, 2023 12:02 PM
To: Delure, Kristy
Subject: Delivery confirmation for job 14011025

This message originated from outside of Gowling WLG. | Ce message provient de l'extérieur de Gowling WLG.



Delivery Confirmation

Package Type	Envelope	Quantity	1 piece
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 GOWLING WLG (Canada) LLP 1400- Att Photo Of Courier Label, 421 7 Ave SW	 NOVA CHEMICAL CORP. C/O HEAD OFFICE 2100, 250 5 St SW
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<="">

Reference **A170537/S.GABOR**

Delivered at **2023-03-14 - 12:01
Mountain Standard Time**

Signed By **Ikta**

see tracking link for up-to-date information and any media attachments

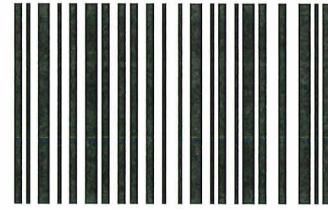
TRACK ORDER
TR5350614011025



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Email inquiries can be sent to csr@directitgroup.ca



DIRECT·IT GROUP **COURIER**



14011025

#14011025

Status	Verified
Location	Delivered
Your Name & Phone	LOLITA
Call In	03-14 09:37AM
Due by	03-14 11:42AM
Delivered	03-14 12:01PM
Service Minutes	120
Proof of Delivery	Ikta
Signature	Trip Delivered

No Live Tracking Available



TrackingNo

TR5350614011025

Copy into Clipboard

<https://ship.directx.ca/#!/TrackNo/TR5350614011025>

From GOWLING WLG (Canada) LLP
From Address 1400- Att Photo Of Courier Label,421 7 Ave,SW, Calgary, AB, Ca
To NOVA CHEMICAL CORP. C/O HEAD OFFICE
To Address 2100,250 5 St,SW, Calgary, AB,Canada
Pieces 1
Weight 1 lbs
Service Type C

Instructions

**Third party
Tracking**

Created	Accepted	Picked Up	Delivered
03-14 09:38	by driver 896 @ 03-14 09:38	by driver 896 @ 03-14 11:50	signed by "Ikta" @ 03-14 12:01

PH: (403)-264-6666 - csr@directitgroup.ca (<mailto:csr@directitgroup.ca>)

Delure, Kristy



From: Notification <notification@directitgroup.ca>
Sent: March 14, 2023 12:02 PM
To: Delure, Kristy
Subject: Delivery confirmation for job 14011037

This message originated from outside of Gowling WLG. | Ce message provient de l'extérieur de Gowling WLG.



Delivery Confirmation

Package Type	Envelope	Quantity	1 piece
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 GOWLING WLG (Canada) LLP 1400- Att Photo Of Courier Label, 421 7 Ave SW	 NOVA CHEMICALS CORPORATION C/O HEAD OFFI 2100, 250 5 Street SW
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<="">

Reference **A170537/S.GABOR**

Delivered at **2023-03-14 - 12:01 Mountain Standard Time**

Signed By **Ikta**

see tracking link for up-to-date information and any media attachments

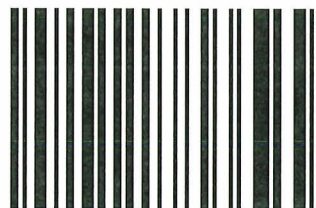
TRACK ORDER
TR6750614011037



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Email inquiries can be sent to csr@directitgroup.ca



DIRECT·IT GROUP **COURIER**

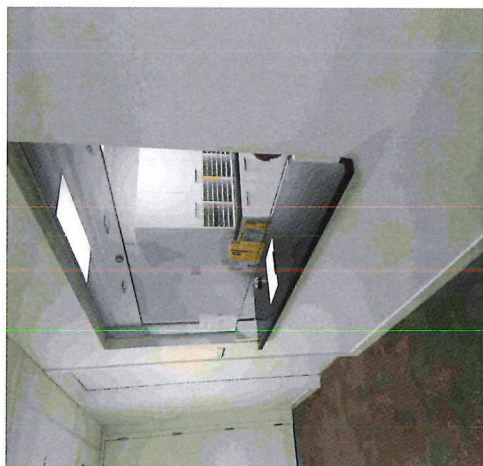


14011037

#14011037

Status	Verified
Location	Delivered
Your Name & Phone	LOLITA
Call In	03-14 09:39AM
Due by	03-14 11:44AM
Delivered	03-14 12:01PM
Service Minutes	120
Proof of Delivery	Ikta
Signature	Trip Delivered

No Live Tracking Available



TrackingNo

TR6750614011037

Copy into Clipboard

<https://ship.directx.ca/#!/TrackNo/TR6750614011037>

From GOWLING WLG (Canada) LLP
From Address 1400- Att Photo Of Courier Label,421 7 Ave,SW, Calgary, AB, Ca
To NOVA CHEMICALS CORPORATION C/O HEAD OFFI
To Address 2100,250 5 Street,SW, Calgary, Alberta,Canada
Pieces 1
Weight 1 lbs
Service Type C

Instructions

**Third party
Tracking**

Created	Accepted	Picked Up	Delivered
03-14 09:40	by driver 896 @ 03-14 09:40	by driver 896 @ 03-14 11:50	signed by "Ikta" @ 03-14 12:01

PH: (403)-264-6666 - csr@directitgroup.ca (<mailto:csr@directitgroup.ca>)