COURT FILE NO. 2203 13202

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL EDMONTON CENTRE

PLAINTIFF MOSKOWITZ CAPITAL MORTGAGE FUND II INC.

DEFENDANTS 1631807 ALBERTA LTD., RADIENT TECHNOLOGIES INC., and RADIENT TECHNOLOGIES (CANNABIS) INC.

DOCUMENT APPLICATION BY THE RECEIVER FOR A SALE AND VESTING ORDER

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT McLENNAN ROSS LLP #600 McLennan Ross Building 12220 Stony Plain Road Edmonton, AB T5N 3Y4 Lawyer: Ryan Trainer Telephone: (780) 482-9153 Fax: (780) 482-9100 Email: ryan.trainer@mross.com File No.: 20230959

NOTICE TO RESPONDENTS: THE SERVICE LIST (attached as Schedule "B")

This application is made against you. You are a Respondent.

You have the right to state your side of this matter before the Court.

To do so, you must be in Court when the application is heard as shown below:	
Date:	July 19, 2023
Time:	2:00 p.m.
Where:	Edmonton Law Courts, 1A Sir Winston Churchill Square, Edmonton, AB T5J 0R2 by Webex
Before Whom:	The Honourable Mr. Justice K. Feth

Go to the end of this document to see what else you can do and when you must do it.

Remedy claimed or sought:

- 1. An Order abridging time for service if necessary.
- An Order substantially in the form attached hereto as Schedule "A" approving a further auction sale (the "Second Auction Sale") to be completed by Workingman Capital Corp. ("Workingman") to sell at auction the remaining personal property of 1631807 Alberta Ltd. and



Radient Technologies Inc. (collectively the "**Debtors**") in accordance with a Request for Offers or Liquidation Proposals (the "**ROP**") conducted by the Receiver.

- 3. An Order vesting right, title, and interest in and to the Debtors' assets to the end purchasers upon Workingman completing the Second Auction Sale free and clear of all encumbrances.
- 4. An Order authorizing and directing the Receiver to take all steps reasonably required to carry out the Second Auction Sale, including amending the auction agreement executed between the Receiver and Workingman (the "Auction Agreement").
- 5. An Order ratifying and approving the Receiver's activities to date.
- 6. An Order increasing the Receiver's Charge from \$50,000 to \$100,000.
- 7. An Order granting such other and further relief as the circumstances may require as this Honourable Court shall deem appropriate.

Grounds for making this application:

- 8. Pursuant to section 243(1) of the Bankruptcy and Insolvency Act, RSC 1985, c B-3, and sections 13(2) of the Judicature Act, RSA 2000, c J-2 and 65(7) of the Personal Property Security Act, RSA 2000, c P-7, the Receiver was appointed without security of certain personal property of the Debtors described in Exhibit "L" of the Affidavit of Brian Moskowitz dated March 13, 2023, together with any other personal property of the Debtors as may be agreed upon by the Receiver and the Debtors, including all proceeds thereof (the "Property"), pursuant to the Limited Receivership Order pronounced on March 21, 2023 (the "Limited Receivership Order").
- 9. The Limited Receivership Order authorizes the Receiver to, among other things:
 - (a) Market any or all of the Property (and to solicit offers in respect of such Property or any part thereof), in accordance with paragraph 3(g);
 - (b) Negotiate the terms and conditions of a sale of Property in accordance with paragraph 3(g);
 - (c) Sell, convey, transfer, lease or assign the Property or any part or parts thereof out of the ordinary course of business with the approval of this Honourable Court, in accordance with paragraph 3(h); and
 - (d) Apply for any vesting orders or other orders necessary to convey the Property or any part or parts thereof to a purchaser or purchasers thereof, free and clear of any liens or encumbrances affecting such Property, in accordance with paragraph 3(i).
- 10. A Sale and Vesting Order was granted on May 30, 2023 (the "First Sale and Vesting Order") approving the proposed auction sale (the "First Auction Sale") by Workingman Capital Corp ("Workingman").
- 11. A Consent Order was granted on June 23, 2023 amending the First Sale and Vesting Order to include an additional asset of the Debtors in the First Auction Sale. The First Auction Sale closed June 27, 2023.
- 12. The Plaintiff is seeking to amend the Limited Receivership Order to include the remaining assets of the Debtors so that the Receiver may proceed with the Second Auction Sale of the remaining assets, which are specifically included at Exhibit "A" of the Affidavit of Brian Moskowitz of July 10,

2023 along with any assets that were included in the First Sale and Vesting Order but were not sold at the First Auction Sale.

- 13. The Receiver is of the view that having Workingman complete the proposed Second Auction Sale is in the best interests of the Debtors, creditors and all stakeholders for the following reasons:
 - a. The Receiver is satisfied with the results of the First Auction Sale;
 - b. Workingman and its agents remain on site at the Debtors' business and are in the process of collecting payment and shipping assets sold in the First Auction Sale;
 - c. Any assets subject to the First Sale and Vesting Order that remain unsold following the First Auction Sale will be included by Workingman in the Second Auction Sale;
 - d. The Second Auction Sale can proceed without delay; and
 - e. There are significant efficiencies should the Receiver not need to conduct a new request for proposals process, together with such ancillary matters including but not limited to, reaching terms on a new auction agreement and a further court appearance.
- 14. The Receiver's activities to-date were reasonable and necessary for the administration of the within receivership.
- 15. Given the increased scope of the Limited Receivership Order, including the need to oversee the Second Auction Sale and a further application for distribution and discharge, the Receiver believes it is appropriate that the Receiver's Charge be increase from \$50,000 to \$100,000.
- 16. Such further and other grounds as counsel may advise and this Honourable Court may permit.

Material or evidence to be relied on:

- 17. Receiver's First Report and the Confidential Appendices to the Receiver's First Report which are currently subject to a Restricted Court Access Order.
- 18. Receiver's Second Report to the Court.
- 19. Such further and other evidence as counsel may advise and this Honourable Court may permit.

Applicable rules:

- 20. Alberta Rules of Court rules 1.3, 1.4, 6.3(1), 6.9(1), 6.28, 6.29, 6.30, 6.31, 6.32, 11.27, 11.29 and 13.25.
- 21. Such further and other statutes and rules as counsel may advise.

Applicable Acts and Regulations:

- 22. *Judicature Act*, RSA 2000, c. J-2, as amended, specifically section 8.
- 23. Bankruptcy and Insolvency Act, RSC 1985 c. B-3.
- 24. Personal Property Security Act, RSA 2000, c. P-7.

25. Such further and other Acts and regulations as counsel may advise and this Honourable Court may permit.

Any irregularity complained of or objection relied on:

26. None.

How the application is proposed to be heard or considered:

27. By Webex hearing before the Honourable Mr. Justice K. Feth.

AFFIDAVIT EVIDENCE IS REQUIRED IF YOU WISH TO OBJECT.

WARNING

If you do not come to Court either in person or by your lawyer, the Court may give the Applicants what they want in your absence. You will be bound by any order that the Court makes. If you want to take part in this application, you or your lawyer must attend in Court on the date and time shown at the beginning of the form. If you intend to give evidence in response to the application, you must reply by filing an Affidavit or other evidence with the Court and serving a copy of that Affidavit or other evidence on the Applicants a reasonable time before the application is to be heard or considered.

COURT FILE NUMBER	2203 13202	Clerk's Stamp	
COURT	COURT OF QUEEN'S BENCH OF ALBERTA		
JUDICIAL CENTRE	EDMONTON		
PLAINTIFF	MOSKOWITZ CAPITAL MORTGAGE FUND II	INC.	
DEFENDANTS	1631807 ALBERTA LTD., RADIENT TECHNOL and RADIENT TECHNOLOGIES (CANNABIS)		
DOCUMENT ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	APPROVAL AND VESTING ORDER (Sale by Receiver) McLENNAN ROSS LLP #600 McLennan Ross Building 12220 Stony Plain Road Edmonton, AB T5N 3Y4		
	Lawyer: Ryan Trainer Telephone: (780) 482-9153 Fax: (780) 492-9100 Email: ryan.trainer@mross.com File No.: 20230959		
DATE ON WHICH ORDER WAS PRONOUNCED: July 19, 2023			

LOCATION WHERE ORDER WAS PRONOUNCED: Edmonton, Alberta

NAME OF JUSTICE WHO MADE THIS ORDER: The Honourable Mr. Justice K. Feth

UPON THE APPLICATION by MNP Ltd. in its capacity as the Court-appointed receiver (the "Receiver") of certain personal property of 1631807 Albert Ltd.. and Radient Technologies Inc. (collectively, the "Debtors") described in Exhibit "L" of the Affidavit of Brian Moskowitz dated March 13, 2023, the asset described in the Consent Order granted June 23, 2023, and Exhibit "A" of the Affidavit of Brian Moskowitz dated July 10, 2023, together with any other personal property of the Debtors as may be agreed upon by the Receiver and the Debtors, including all proceeds thereof, for an order approving the proposed second auction sale (the "Second Auction Sale") contemplated by Workingman Capital Corp. ("Workingman") in accordance with a Request for Offers to Purchase (the "ROP") for the sale of the purchased assets (the "Purchased Assets'), and vesting the Debtors' right, title and interest in and to the Purchased Assets to the end purchasers (the "Purchaser" or "Purchasers");

AND UPON the Plaintiff's application to expand the scope of the Receivership Order to include the remaining assets of the Debtors;

AND UPON HAVING READ the Limited Receivership Order dated March 21, 2023 (the "Receivership Order"), the Receivership Amending Order dated July 19, 2023 (the "Amending Order"), the Receiver's First Report to the Court along with the Confidential Appendices attached thereto, the Receiver's Second Report to the Court and the Affidavit of Service of Lynae Anderson;

AND UPON HEARING the submissions of counsel for the Receiver, counsel for the Plaintiff and those in attendance, and no one appearing for any other person on the service list, although properly served as appears from the Affidavit of Service, filed;

AND UPON HAVING READ the Sale and Vesting Order granted on May 30, 2023 (the "First Sale and Vesting Order") approving the auction sale of the Receiver, and the Consent Order granted on June 23, 2023 amending the First Sale and Vesting Order;

AND UPON NOTING that the auction sale of the personal property of the Debtors held pursuant to the First Sale and Vesting Order closed on June 27, 2023 and the net sale proceeds are currently being collected by Workingman;

IT IS HEREBY ORDERED AND DECLARED THAT:

SERVICE

1. Service of notice of this application and supporting materials is hereby declared to be good and sufficient, no other person is required to have been served with notice of this application and time for service of this application is abridged to that actually given.

APPROVAL OF SECOND AUCTION SALE

2. The Second Auction Sale is hereby approved and the Receiver is hereby authorized and directed to take such additional steps and execute such additional documents, including amending the Auction Agreement between the Receiver and Workingman as may be necessary or desirable for completion of the Second Auction Sale and conveyance of the Purchased Assets to the Purchaser or Purchasers.

VESTING OF PROPERTY

3. Upon delivery of a Receiver's certificate to Workingman substantially in the form set out in Schedule "A" hereto (the "Receiver's Closing Certificate"), all of the Debtors' right, title and interest in and to the Purchased Assets [listed in Schedule "B" hereto] shall vest absolutely in the name of the Purchasers (or their nominees), free and clear of and from any and all caveats, security interests, hypothecs, pledges, mortgages, liens, trusts or deemed trusts, reservations of

ownership, royalties, options, rights of pre-emption, privileges, interests, assignments, actions, judgements, executions, levies, taxes, writs of enforcement, charges, or other claims, whether contractual, statutory, financial, monetary or otherwise, whether or not they have attached or been perfected, registered or filed and whether secured, unsecured or otherwise (collectively, "Claims") including, without limiting the generality of the foregoing:

- (a) any encumbrances or charges created by the Receivership Order;
- (b) any charges, security interests or claims evidenced by registrations pursuant to the *Personal Property Security Act* (Alberta) or any other personal property registry system;

and for greater certainty, this Court orders that all Claims affecting or relating to the Purchased Assets are hereby expunged, discharged and terminated as against the Purchased Assets.

- 4. Upon delivery of the Receiver's Closing Certificate, and upon filing of a certified copy of this Order, together with any applicable registration fees, all governmental authorities including those referred to below in this paragraph (collectively, "Governmental Authorities") are hereby authorized, requested and directed to accept delivery of such Receiver's Closing Certificate and certified copy of this Order as though they were originals and to register such transfers, interest authorizations, discharges and discharge statements of conveyance as may be required to convey to the Purchaser or its nominee clear title to the Purchased Assets subject only to Permitted Encumbrances. Without limiting the foregoing:
 - (a) the Registrar of the Alberta Personal Property Registry (the "PPR Registrar") shall and is hereby directed to forthwith cancel and discharge any registrations at the Alberta Personal Property Registry (whether made before or after the date of this Order) claiming security interests in the estate or interest of the Debtors in any of the Purchased Assets which are of a kind prescribed by applicable regulations as serial-number goods.
- 5. In order to effect the transfers and discharges described above, this Court directs each of the Governmental Authorities to take such steps as are necessary to give effect to the terms of this Order and the Auction Agreement. Presentment of this Order and the Receiver's Closing Certificate shall be the sole and sufficient authority for the Governmental Authorities to make and register transfers of title or interest and cancel and discharge registrations against any of the Purchased Assets of any Claims.
- 6. No authorization, approval or other action by and no notice to or filing with any governmental authority or regulatory body exercising jurisdiction over the Purchased Assets is required for the due execution, delivery and performance by the Receiver of the Second Auction Sale and the Auction Agreement, as amended.

- 7. For the purposes of determining the nature and priority of Claims, net proceeds from sale of the Purchased Assets (to be held in an interest bearing trust account by the Receiver) shall stand in the place and stead of the Purchased Assets from and after delivery of the Receiver's Closing Certificate and all Claims shall not attach to, encumber or otherwise form a charge, security interest, lien, or other Claim against the Purchased Assets and may be asserted against the net proceeds from sale of the Purchased Assets with the same priority as they had with respect to the Purchased Assets immediately prior to the sale, as if the Purchased Assets had not been sold and remained in the possession or control of the person having that possession or control immediately prior to the sale. Unless otherwise ordered (whether before or after the date of this Order), the Receiver shall not make any distributions to creditors of net proceeds from sale of the Purchased Assets without further order of this Court, provided however the Receiver may apply any part of such net proceeds to repay any amounts the Receiver has borrowed for which it has issued a Receiver's Certificate pursuant to the Receivership Order.
- 8. Workingman and the Purchasers shall not, by completion of the Second Auction Sale, have liability of any kind whatsoever in respect of any Claims against the Debtor.
- 9. Upon completion of the Second Auction Sale, the Debtors and all persons who claim by, through or under the Debtors in respect of the Purchased Assets, and all persons or entities having any Claims of any kind whatsoever in respect of the Purchased Assets shall stand absolutely and forever barred, estopped and foreclosed from and permanently enjoined from pursuing, asserting or claiming any and all right, title, estate, interest, royalty, rental, equity of redemption or other Claim whatsoever in respect of or to the Purchased Assets, and to the extent that any such persons or entities remain in the possession or control of any of the Purchased Assets, or any artifacts, certificates, instruments or other indicia of title representing or evidencing any right, title, estate, or interest in and to the Purchased Assets, they shall forthwith deliver possession thereof to the Purchasers (or their nominees).
- 10. The Purchasers (or their nominees) shall be entitled to enter into and upon, hold and enjoy the Purchased Assets for its own use and benefit without any interference of or by the Debtors, or any person claiming by, through or against the Debtors.
- 11. The Receiver is directed to file with the Court a copy of the Receiver's Closing Certificate forthwith after delivery thereof to Workingman.

MISCELLANEOUS MATTERS

- 12. Notwithstanding:
 - (a) the pendency of these proceedings and any declaration of insolvency made herein;

- (b) the pendency of any applications for a bankruptcy order now or hereafter issued pursuant to the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c.B-3, as amended (the "BIA"), in respect of the Debtors, and any bankruptcy order issued pursuant to any such applications;
- (c) any assignment in bankruptcy made in respect of the Debtors; and
- (d) the provisions of any federal or provincial statute:

the vesting of the Purchased Assets in the Purchaser (or its nominee) pursuant to this Order shall be binding on any trustee in bankruptcy that may be appointed in respect of the Debtors and shall not be void or voidable by creditors of the Debtors, nor shall it constitute nor be deemed to be a transfer at undervalue, settlement, fraudulent preference, assignment, fraudulent conveyance, or other reviewable transaction under the BIA or any other applicable federal or provincial legislation, nor shall it constitute oppressive or unfairly prejudicial conduct pursuant to any applicable federal or provincial legislation.

- 13. The Receiver, Workingman, the Purchasers (or their nominees) and any other interested party, shall be at liberty to apply for further advice, assistance and direction as may be necessary in order to give full force and effect to the terms of this Order and to assist and aid the parties in closing the Second Auction Sale.
- 14. This Honourable Court hereby requests the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or in any of its provinces or territories or in any foreign jurisdiction, to act in aid of and to be complimentary to this Court in carrying out the terms of this Order, to give effect to this Order and to assist the Receiver and its agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such order and to provide such assistance to the Receiver, as an officer of the Court, as may be necessary or desirable to give effect to this Order or to assist the Receiver and its agents in carrying out the terms of this Order.
- 15. The Receiver's activities as set out in the Receiver's Reports are hereby ratified and approved.
- 16. The Receiver's Charge included at paragraph 19 of the Limited Receivership Order is increased from \$50,000 to \$100,000 in the aggregate.
- 17. Service of this Order shall be deemed good and sufficient by:
 - (a) Serving the same on:
 - (i) the persons listed on the service list created in these proceedings;
 - (ii) any other person served with notice of the application for this Order; and

- (iii) any other parties attending or represented at the application for this Order;
- (b) Posting a copy of this Order on the Receiver's website at: https://mnpdebt.ca/en/corporate/corporate-engagements/radient-technologies-inc

and service on any other person is hereby dispensed with.

Service of this Order may be effected by facsimile, electronic mail, personal delivery or courier.
 Service is deemed to be effected the next business day following transmission or delivery of this Order.

Justice of the Court of Queen's Bench of Alberta

Schedule "A"

Form of Receiver's Certificate

COURT FILE NUMBER	2203 13202	Clerk's Stamp
COURT	COURT OF QUEEN'S BENCH OF ALBERTA	
JUDICIAL CENTRE	EDMONTON	
	l	
PLAINTIFF	MOSKOWITZ CAPITAL MORTGAGE FUND II ING	Э.
DEFENDANT	1631807 ALBERTA LTD., RADIENT TECHNOLOG and RADIENT TECHNOLOGIES (CANNABIS) INC	
DOCUMENT	RECEIVER'S CERTIFICATE	
ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	McLENNAN ROSS LLP #600 McLennan Ross Building 12220 Stony Plain Road Edmonton, AB T5N 3Y4 Lawyer: Ryan Trainer Telephone: 780.482.9153 Fax: 780.733.9716 Email: ryan.trainer@mross.com File No.: 20230959	

RECITALS

- A. Pursuant to an Order of the Honourable Justice D.R. Mah of the Court of Queen's Bench of Alberta, Judicial District of Edmonton (the "Court") dated March 21, 2023, MNP Ltd. was appointed as the receiver (the "Receiver") of certain personal property of 1631807 ALBERTA LTD. and RADIENT TECHNOLOGIES INC (the "Debtors").
- B. Pursuant to an Order of the Court dated July 19, 2023 (the "Sale Approval and Vesting Order"), the Court approved the second auction sale proposed by Workingman Capital Corp. ("Workingman") and the related auction sale (the "Second Auction Sale") of the assets of the Debtors (the "Purchased Assets") and provided for the vesting in the Purchased Assets to the end purchasers ("Purchaser" or "Purchasers") after Workingman completes the proposed Auction Sale of the Debtors' right, title and interest in and to the Purchased Assets, which vesting is to be effective with respect to the Purchased Assets upon the delivery by the Receiver to Workingman of a certificate confirming (i) the payment by the Purchasers of the purchase price (the "Purchase

Price") for the Purchased Assets; and (ii) the Auction Sale has been completed to the satisfaction of the Receiver.

C. Unless otherwise indicated herein, capitalized terms have the meanings set out in the Auction Agreement.

THE RECEIVER CERTIFIES the following:

- 1. Workingman has paid and the Receiver has received the Purchase Price for the Purchased Assets payable on the Closing Date pursuant to the Second Auction Agreement;
- 2. The conditions to Closing as set out in the Auction Agreement have been satisfied or waived by the Receiver and the Purchaser (or its nominee);
- 3. The Second Auction Sale has been completed to the satisfaction of the Receiver. and
- 4. This Certificate was delivered by the Receiver at _____ on ____, 2023.

MNP LTD., in its capacity as Receiver of the personal property of
1631807 ALBERTA LTD. and
RADIENT TECHNOLOGIES INC. as described in the Limited Receivership Order, and not in its personal capacity.

Per:

Name: Kristin Gray

Title: Senior Vice President

SCHEDULE "B"

SERVICE LIST

Moskowitz Capital Mortgage Fund II Inc. v 1631807 Alberta Ltd., Radient Technologies Inc., and Radient Technologies (Cannabis) Inc.

KB Action No. 2203 13202

Updated June 29, 2023

Address/Counsel (if appointed)		Party Represented
DLA Piper (Canada) LLP Suite 2700, Stantec Tower 10220 103 rd Avenue Edmonton, AB T54J 0K4		Moskowitz Capital Mortgage Fund II Inc.
Attention:	Jerritt Pawlyk and Kevin Hoy	
Emails:	jerritt.pawlyk@dlapiper.com kevin.hoy@dlapiper.com	
McLennan Ross LLP600 McLennan Ross Building12220 Stony Plain RoadEdmonton, AB T5N 3Y4Attention:Ryan TrainerEmail:ryan.trainer@mross.com kristin.gray@mnp.com steven.barlott@mnp.ca		MNP Ltd. (Proposed Receiver)
Kirwin LLPSuite 100, 12420 – 104th AvenueEdmonton, AB T54N 3Z9Attention:Mark KirwinEmail:mkirwin@kirwinllp.com		1631807 Alberta Ltd., Radient Technologies Inc., and Radient Technologies (Cannabis) Inc.

Address/Counsel (if appointed)	Party Represented
Akaura Holdings Inc.	
4025 101 Street NW	
Edmonton, AB T6E 0A5	
Email: harry@amnorgroup.com	
Fillmore Construction Management Inc. c/o Parlee McLaws LLP in their capacity as the Primary Agent for Service 1700, 10175-101 Street NW Edmonton, AB T5J 0H3 Email:edmontoncorporateservices@parlee.com	
Bishop & McKenzie LLP 2300, 10180-101 Street Edmonton, AB T5J 1V3 Attention: Jose Delgado	Chinook Scaffold Systems Ltd.
Email: jdelgado@bmllp.ca	
Bishop & McKenzie LLP	Valwest Equipment Limited
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Salt Capital Inc. o/a Capital Now Cannabis	
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Email: accounting@capitalnow.ca	

Address/Co	unsel (if appointed)	Party Represented
Workers' Compensation Board/ Collection Unit 9912 107 Street Edmonton, AB T5K 1G5		
Attention:	Lisa Parker	
Email:	lisa.parker@wcb.ab.ca	
Dentons Canada LLP 2500 Stantec Tower 10220 102 Ave NW		Agriculture Financial Services Corporation
Attention:	Dick Cotter, K.C., and Kurtis Letwin	
Emails:	richard.cotter@dentons.com kurtis.letwin@dentons.com	
Reset Finan	cial Inc.	
100, 4208 97 Edmonton, <i>A</i>		
Attention:	ct104@cash-today.ca	
Special Con	tracting Ltd.	
1-2838 Gard Abbotsford,	en St BC V2T 4W7	
Email: specialcontractingltd@gmail.com		
Mintz Law 410, 10339 1	24 Street	Steris Barrier Product Solutions Inc.
Edmonton, A		Series Sales Canada ULC
Email:	bmintz@mintzlaw.ca	
Duncan Craig LLP 2800-10060 Jasper Ave Edmonton, AB T5J 3V9		Azelis Canada Inc.

Address/Co	unsel (if appointed)	Party Represented
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Email:	ncoghlan@DCLLP.com	
Emery Jamieson LLP 2400, 10235-101 Street NW Edmonton, AB T5J 3G1		Tomasz Popek
Attention:	Terence B. Arthur	
Email:	tarthur@emeryjamieson.com	
Canada Rev	venue Agency	
Surrey National Verification and Collections Centre 9755 King George Boulevard Surrey, BC V3T 5E1		
Fax: 1-866	5-219-0311	
Email: George.Body@justice.gc.ca		
2153983 Alb	oerta Ltd.	
9433 58 th Street Edmonton, Alberta T6E 0B8		
Email: ryan@pinenecapital.com		
Bishop & McKenzie LLP		Chinook Scaffold Systems Ltd.
2300, 10180-101 Street Edmonton, AB T5J 1V3		
Attention:	PPR@BMLLP.ca	