

Our File Reference: 20230959

July 13, 2023

Court of King's Bench of Alberta  
Law Courts Building  
1A Sir Winston Churchill Square  
Edmonton, AB T5J 0R2

Attention: Commercial Coordinator

Dear Sir:

Re: **In the Matter of the Receivership of 1631807 Alberta Ltd. and Radiant Technologies Inc. Court File No. 2203 13202**

We are counsel to MNP Ltd. in its capacity as the Court-Appointed Receiver (the **"Receiver"**) of certain personal property of 1631807 Alberta Ltd. and Radiant Technologies Inc. (collectively, the **"Debtors"**).

We understand that the Plaintiff Moskowitz Mortgage Fund II Inc. has an application returnable on Wednesday, July 19, 2023 at 2:00 p.m. before the Honourable Justice K. Feth seeking an order amending the Receivership Order to include the remaining assets of the Debtors to the scope of the Receivership Order (the **"Amending Order"**).

Should the Amending Order be granted, the Receiver is seeking a Sale and Vesting Order approving a further auction sale of the remaining assets, along with approval of the Receiver's activities and increase in the Receiver's Charge from \$50,000 to \$100,000.

**Ryan Trainer**

ryan.trainer@mross.com

Direct 780.482.9153

**Lynae Anderson, Assistant**

lynae.anderson@mross.com

Direct 780.482.9162

Fax 780.733.9716

*PLEASE REPLY TO EDMONTON OFFICE  
SENT BY E-MAIL*

**Edmonton**

600 McLennan Ross Building  
12220 Stony Plain Road  
Edmonton, AB T5N 3Y4  
Telephone 780 482 9200  
Facsimile 780 482 9100  
Toll-free 800 567 9200

**Calgary**

1900 Eau Claire Tower  
600 - 3<sup>rd</sup> Avenue SW  
Calgary, AB T2P 0G5  
Telephone 403 543 9120  
Facsimile 403 543 9150  
Toll-free 888 543 9120

**Yellowknife**

301 Nunasi Building  
5109 - 48<sup>th</sup> Street  
Yellowknife, NT X1A 1N5  
Telephone 867 766 7677  
Facsimile 867 766 7678  
Toll-free 888 836 6684

In making our application, we expect to rely upon the following materials:

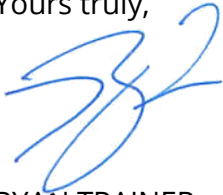
- Application;
- First Report to the Court of the Receiver and the Confidential Appendices currently subject to a Restricted Court Access Order;
- Second Report to the Court of the Receiver and any confidential appendices thereto;
- Proposed Restricted Court Access Order, if necessary;
- Draft Approval and Vesting Order.

We anticipate the application will take 60 minutes and are not expecting opposition to the application.

We estimate the reading time in preparation for this hearing will be 2 hours.

We trust the foregoing to be in order. Please do not hesitate to contact us should you have any questions or require additional information.

Yours truly,



RYAN TRAINER

RTT/lna

cc: Kristin Gray - MNP Ltd.

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