

#### Clerk's stamp:

COURT FILE NUMBER

COURT

JUDICIAL CENTRE

**PLAINTIFF** 

**DEFENDANTS** 

DOCUMENT

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

2103 10070 2203 - 13202

COURT OF KING'S BENCH OF ALBERTA

**EDMONTON** 

MOSKOWITZ CAPITAL MORTGAGE FUND II

INC.

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

#### **FEE AFFIDAVIT**

Receiver:

MNP Ltd.

Suite 1300, MNP Tower 10235 – 102 Street NW

Edmonton, AB, Canada T5J 2G1

Attention: Kristin Gray

Phone: 780.705.0073 Fax: 780.409.5415

Email: kristin.gray@mnp.ca

Counsel:

McLennan Ross LLP 600 McLennan Ross Building 12220 Stony Plain Road NW Edmonton, AB, Canada T5N 3Y4

Attention: Ryan Trainer

Phone: 780.482.9153 Fax: 780.482.9100

Email: ryan.trainer@mross.com

#### AFFIDAVIT OF KRISTIN GRAY SWORN ON SEPTEMBER 15, 2023

I, Kristin Gray, CPA, CA, CIRP, LIT of Edmonton, Alberta, SWEAR AND SAY THAT:

- I am a Senior Vice-President with MNP Ltd., Receiver of certain personal property of 1631807 Alberta Ltd. and Radient Technologies Inc. (the "Receiver") and as such I have personal knowledge of the facts and matters herein deposed to except where stated to be based upon information and belief, and where so stated I verily believe the same to be true.
- 2. MNP Ltd. was appointed Receiver of certain personal property of 1631807 Alberta Ltd. and Radient Technologies Inc. pursuant to an Order of the Honourable Justice D.R. Mah of the Alberta Court of King's Bench dated March 21, 2023 (the "Receivership").

- 3. I am a Chartered Professional Accountant and Licensed Insolvency Trustee with over 9 years of experience in the area of Insolvency and Restructuring and have been handling the day-to-day administrative work in relation to the Receivership.
- 4. With respect to the Receiver's accounts covering fees and disbursements incurred by the Receiver for the period March 21, 2023, to July 31, 2023, which accounts are contained herein as Exhibit "A" (the "Accounts"):
  - (a) The Accounts specifically outline the date of the work completed, the description of the work completed, the length of time taken to complete the work, and name of the individual who completed the work;
  - (b) The hourly rate for each and every individual employee of the Receiver which completed work in regard to the Receivership (the "Hourly Rates"), including Non Professional staff is as follows:

#### The MNP Ltd. team:

- (i) Kristin Gray, Senior Vice-President and Licensed Insolvency Trustee \$550/600;
- (ii) Karen Aylward, Vice President \$560;
- (iii) Carolina Bautista, Senior Consultant \$381:
- (iv) Steven Barlott, Senior Consultant \$300/350:
- (v) Maha Shah, Consultant \$300/350; and,
- (vi) Various Administrative Staff (Non-Professional) \$205/216/244.
- (c) I submit that the Hourly Rates are reasonable and comparable to the hourly rates of other accountant firms within the city of Edmonton of equivalent competence and expertise in the insolvency area;
- (d) The disbursements contained within the Accounts totaling \$15,890 are comprised of:
  - (i) Legal fees and disbursements (included in the Receiver's legal counsel fees below) of \$9,244;
  - (ii) Insurance costs of \$3,000;
  - (iii) Equipment move costs of \$1,305;
  - (iv) Security costs of \$1,114;
  - (v) Contractor costs of \$1,012.50; and,
  - (vi) Other costs for change of locks and office costs of \$215.
- 5. With respect to the Receiver's independent legal counsel, McLennan Ross LLP ("McLennan Ross"), accounts covering fees and disbursements incurred by counsel for the period March 9, 2023, to August 15, 2023, which accounts are contained herein as Exhibit "B" (the "Legal Accounts"):

- (a) The Legal Accounts specifically outline the date of the work completed, the description of the work completed, the length of time taken to complete the work, and name of the individual who completed the work;
- (b) The hourly rate for each and every individual employee of McLennan Ross which completed work in regard to the Receivership (the "Legal Hourly Rates"), including Non Professional staff is as follows:

#### The McLennan Ross Team:

- (i) Charles P. Russell, K.C., Partner \$675;
- (ii) Ryan Trainer, Partner \$400;
- (iii) Stephanie Moeck, Associate \$330;
- (iv) Lydia Roseman, Associate \$305;
- (v) Stephanie Chan, Paralegal \$150;
- (vi) Nancy Ryan, Paralegal \$135; and,
- (vii) Lynae Anderson, Administration \$135.
- (c) I submit that the Legal Hourly Rates are reasonable and comparable to the hourly rates of other law firms within the city of Edmonton of equivalent competence and expertise in the insolvency area;
- (d) The disbursements contained within the Legal Accounts totaling \$514 are comprised of:
  - (i) Printing and scanning fees of \$180;
  - (ii) Filing fees of \$108;
  - (iii) Search fees (corporate, bankruptcy, litigation, etc.) of \$16;
  - (iv) Postage and Delivery fees of \$130;
  - (v) Search fees (PPR and Corporate) of \$71; and,
  - (vi) Other charges of \$10.

6. I make this Affidavit in support of the application to approve the fees, disbursements, and GST of \$80,012 which have been rendered by MNP Ltd. and to approve the fees, disbursements, other charges, and GST of \$33,830 which have been rendered by McLennan Ross, within this Action.

**SWORN** before me at the City of Edmonton, in the Province of Alberta, this 15<sup>th</sup> day of September 2023.

A Commissioner for Oaths in and for the Province of Alberta

Kristin Gray, CPA, CA, CIRP, LIT Senior Vice-President

## ISOBEL NICOLE SMITH

A Commissioner for Oaths in and for Alberta My Commission expires August 31, 2024 Appointee No. 0764665

## **EXHIBIT A**

Summary of Receiver's Invoices and Copies of Invoices

This is Exhibit "	" referred to
in the Affiday	it of
Kristin Gra	<u>y</u>
Sworn before me this	.15day
oi September	, 20.03
Sold Built	
A Commissioner for Oaths in	

### ISOBEL NICOLE SMITH

A Commissioner for Oaths in and for Alberta My Commission expires August 31, 2024 Appointee No. 0764665

## In the Matter of the Receivership of 1631807 Alberta Ltd. and Radient Technologies Inc.

## **Summary of Receiver's Fees**

## For the period of March 21, 2023, to July 31, 2023

Period	Invoice	Fees	Disbursements	GST	Total
March 21, 2023 - March 31, 2023 1	10984542	10,460.50	-	523.03	10,983.53
April 1, 2023 - April 30, 2023	11038321	13,159.40	3,601.50	838.05	17,598.95
May 1, 2023 - May 31, 2023	11098810	16,967.60	12,288.21	1,312.79	30,568.60
June 1, 2023 - June 30, 2023	11139426	6,710.00	- I	335.50	7,045.50
July 1, 2023 - July 31, 2023	11182286	13,157.40	-	657.87	13,815.27
	•	60,454.90	15,889.71	3,667.24	80,011.85



April 27, 2023

Moskowitz Capital Mortgage Fund II Inc. 6 Eglinton Ave E, Suite 301 Toronto, ON M4P 1A6

Attention: Brian Moskowitz

Re: In the Matter of the Receivership of 1631807 Alberta Ltd., and Radient Technologies

Inc. (the "Companies")
Client Number: 1013477

Please find enclosed our Invoice No. 10984542 for professional services rendered for the period of March 21, 2023, to March 31, 2023, which we trust you will find in order.

If you have any questions, please don't hesitate to contact us.

Yours very truly,

MNP Ltd.
Receiver of 1631807 Alberta Ltd., and
Radient Technologies Inc.

Per:

Kristin Gray, CPA, CA, CIRP, LIT Enclosure





Invoice No: 10984542 GST No: 10369 7215

Moskowitz Capital Mortgage Fund II Inc. 6 Eglinton Ave E, Suite 301 Toronto, ON M4P 1A6

**Attention: Brian Moskowitz** 

Re: In the Matter of the Receivership of 1631807 Alberta Ltd., and Radient Technologies

inc. (the "Companies")
Client Number: 1013477

PROFESSIONAL SERVICES RENDERED by members of the staff of MNP Ltd., as Receiver of the Companies, for the period March 21, 2023, to March 31, 2023, including inter alia the following:

DATE	STAFF	DESCRIPTION	TIME	FEE
21-Mar-2023	IS	Set up the case website for the Receivership; Various correspondence with Kristin Gray regarding the CRA business numbers for the Companies. Draft a letter to the CRA regarding the same;	1.00	205.00
21-Mar-2023	KG	Review of application materials; Review of equipment listing; Review of the proposal from Workingman Capital; Various correspondence regarding changes to the proposed Order; Review the proposed Order; Correspondence with Ryan Trainer of McLennan Ross LLP ("McLennan Ross") regarding insurance and PPR registrations; Prepare for and attend the application to appoint a Receiver; Email correspondence to Mark Kirwin of Kirwin LLP, counsel to the Companies, regarding contact and access information; Give instructions to Maha Shah regarding the preparation of a Request for Offers to Purchase ("ROP"); Give instructions to Isobel Smith to prepare a case website and correspondence to CRA requesting authorization to program accounts; Approve website update.	3.00	1,650.00



		Call with Colliers International ("Colliers") regarding access to the Properties; Email correspondence to Steve Splinter of the Companies regarding access, location of assets, insurance, and CRA; Review letter to CRA;		
22-Mar-2023	SB	Attendance at the Companies and to view and inventory assets; Make arrangements with a locksmith to change locks; Make arrangements with a contractor to do weekly insurance inspections of the vacant warehouse and secure broken a window;	3.50	1,050.00
22-Mar-2023	IS	Various edits to the case website; Various correspondence with Steven Barlott;	.30	61.50
22-Mar-2023	KG	Attendance at the Companies; View assets; Meet with Jim Bijoux of Colliers regarding access to the vacant building; Meet with the Company regarding various required information; Correspondence with Josh Sugar of Workingman Capital regarding an auction proposal. Give instructions to Steven Barlott to change locks, coordinate boarding broken windows, and schedule regular insurance checks; Call with Ryan Trainer of McLennan Ross regarding the PPR registrations and legal opinion; Updates to the ROP distribution list;	3.10	1,705.00
23-Mar-2023	MS	Begin drafting ROP and list of auctioneers and competitors in the Cannabis extraction industry. Send the same to Kristin Gray for review;	1.50	450.00
23-Mar-2023	SB	Meet Locksmith onsite to change locks. Correspondence with Jim Bijou of Colliers regarding same;	2.00	600.00
23-Mar-2023	IS	Various client acceptance tasks and Ascend entries;	1.00	205.00
23-Mar-2023	KG	Correspondence with Lyle Cote regarding a quote for boarding the windows; Email follow-up to the Companies regarding the information request;	.30	165.00



		Review insurance policies and draft a list of comments and questions;	•	
24-Mar-2023	MS	Update potential purchaser list and edits to the ROP;	.20	60.00
24-Mar-2023	SB	Review various correspondence from HUB International Insurance ("HUB") regarding equipment insurance; Review asset listing and prepare cost listing of equipment included in Receivership; Review ROP;	2.00	600.00
24-Mar-2023	IS	Post website update;	.50	102.50
24-Mar-2023	KG	Review and edits to CRA authorization letter; Email correspondence to Avison Young Property Management regarding potential services at the vacant building; Email correspondence to the Companies regarding insurance questions and concerns; Review FILED Order; Correspondence with the Companies regarding changes to the equipment listing; Various email correspondence to Jon Heinz of HUB regarding the insurance policies; Various calls with Tony Thompson of HUB regarding the same; Email correspondence to Jerritt Pawlyk of DLA Piper LLP ("DLA") regarding issues with the equipment listing and insurance. Call Ryan Trainer of McLennan Ross regarding the same; Email correspondence to the Companies regarding access to the operating building and changes to Exhibit L; Detailed review of the value of equipment on Exhibit L; Call with Josh Sugar of Workingman Capital regarding an auction proposal; Complete the insurance questionnaire;	3.70	2,035.00
27-Mar-2023	SB	Correspondence with Lyle Cote regarding	.20	60.00
21 -Wigi - 2020	ŲD	the boarding of windows and securing the building;		
27-Mar-2023	IS	Finalize and send AUT-01 Forms to the CRA;	.30	61.50



27-Mar-2023	KG	Correspondence with Mickey Spencer of GD Auctions and Appraisals ("GD Auctions") and Ron Victor of Miterra regarding the assets; Call with Jerritt Pawlyk of DLA regarding insurance; Call with the Companies regarding the asset listing; Email Steven Stricker of the Companies regarding assets used for operations; Review and approve an invoice for payment;	.50	275.00
28-Mar-2023	KG	Attendance at the Companies to meet with Mickey Spencer of GD Auctions and Ron Victor of Miterra to view assets and the vacant building. Discussions regarding sales strategy; Review ROP and provide edits to Maha Shah; Call with Josh Sugar of Workingman Capital regarding the equipment listing;	1.50	825.00
30-Mar-2023	MS	Prepare equipment list with locations and update ROP. Send the same to Kristin Gray;	.50	150.00
30-Mar-2023	KG	Follow-up email correspondence to the Company regarding the equipment still in use; Review updated equipment listing with locations;	.20	110.00
31-Mar-2023	SB	Arrange for a security guard to monitor the Property over the weekend due to a breakin;	.30	90.00
	TOTAL		25.60	10,460.50



**INVOICE SUMMARY** 

PROFESSIONAL FEES \$10,460.50

GST on Professional Fees 523.03

523.03

**TOTAL THIS INVOICE** 

\$10,983.53

The time incurred by members of the staff of MNP Ltd. on this assignment regarding the Companies for the period March 21, 2023, to March 31, 2023, was as follows:

#### **FEE SUMMARY**

			Hourly	
Staff	Position	Hours	Rate \$	Total \$
Kristin Gray	Senior Vice President	12.30	550.00	6,765.00
Steven Barlott	Senior Consultant	8.00	300.00	2,400.00
Maha Shah	Consultant	2.20	300.00	660.00
Isobel Smith	Administration	3.10	205.00	635.50
Time Billed		25.60	408.61 *	10,460.50





May 17, 2023

Moskowitz Capital Mortgage Fund II Inc. 6 Eglinton Ave E, Suite 301 Toronto, ON M4P 1A6

**Attention: Brian Moskowitz** 

Re: in the Matter of the Receivership of 1631807 Alberta Ltd. and Radient Technologies

Inc.(the "Companies")
Client Number: 1013477

Please find enclosed our Invoice No. 11038321 for professional services rendered for the period of April 1, 2023, to April 30, 2023, which we trust you will find in order.

If you have any questions, please don't hesitate to contact us.

Yours very truly,

MNP Ltd.
Receiver of 1631807 Alberta Ltd. and
Radient Technologies Inc.

Per:

Kristin Gray, CPA, CA, CIRP, LIT

**Enclosure** 





Invoice No: 11038321 GST No: 10369 7215

Moskowitz Capital Mortgage Fund II Inc. 6 Eglinton Ave E, Suite 301 Toronto, ON M4P 1A6

**Attention: Brian Moskowitz** 

Re: In the Matter of the Receivership of 1631807 Alberta Ltd. and Radient Technologies

Inc.(the "Companies")
Client Number: 1013477

**PROFESSIONAL SERVICES RENDERED** by members of the staff of MNP Ltd., as Receiver of the Companies, for the period April 1, 2023, to April 30, 2023, including inter alia the following:

DATE	STAFF	DESCRIPTION	TIME	FEE
01-Apr-2023	KG	Various correspondence with the inspection contractor regarding a break-in at the Property; Attendance at the Property; Coordinate security; Meet with security for a walk-through; Give instructions to a contractor to board access points; Various correspondence with the lender regarding security;	1.50	825.00
02-Apr-2023	KG	Attendance at the Property to meet the contractor to review and re-board various access points;	.30	165.00
03-Apr-2023	MS	Update Request for Offers to Purchase ("ROP") distribution list;	.20	60.00
03-Apr-2023	KG	Attendance at the Property to meet Paladin security; Call with Jerritt Pawlyk of DLA Piper LLP ("DLA Piper") regarding insurance and security concerns; Call with Ryan Trainer of McLennan Ross LLP ("McLennan Ross") regarding security, sales strategy, and Court approval timeline; Follow-up email to the Company regarding CRA information; Call with CRA High-Risk Insolvency ("HRI") agent regarding trust audits and account maintenance; Website update;	1.50	825.00



04-Apr-2023	KG .	Review and approve invoices for payment; Correspondence to Jerritt Pawlyk of DLA Piper regarding the finalization of the ROP; Call with Mickey Spencer of GD Auctions and Appraisals ("GD Auctions") regarding the asset listing and logistics; Email to the lender regarding insurance, ROP strategy, security, and changes to the equipment list; Coordinate a call with the lender; Coordinate a call with Josh Sugar of Workingman Capital Ltd. ("Workingman"); Call with Ryan Trainer of McLennan Ross regarding sales strategy and Court approval timing;	1.00	550.00
05-Apr-2023	KG	Call with Josh Sugar of Workingman regarding the asset listing and auction considerations; Call with the lender, Jerritt Pawlyk of DLA Piper, and Ryan Trainer of McLennan Ross regarding insurance, equipment listing, auction considerations, and insurance; Various correspondence with HUB International Insurance ("HUB") regarding liability and property coverage; Correspondence with Novem Pharmaceuticals regarding interest in the assets; Call with Connie King of CRA regarding the trust audit. Correspondence with the Company regarding the same; Call with Kurtis Letwin of Dentons LLP ("Dentons") regarding CRA claims and timeline; Correspondence with Steven Splinter regarding asset existence attestation;	4.00	2,200.00
06-Apr-2023	KG	Email correspondence to the lender regarding insurance quotes and follow-up on other items. Correspondence with Ryan Trainer of McLennan Ross regarding the same;	.50	275.00
10-Apr-2023	KG	Correspondence with Ryan Trainer of McLennan Ross regarding the indemnity; Coordinate tour with Josh Sugar of Workingman;	.20	110.00
11-Apr-2023	MS	Update potential purchaser tracker;	.20	60.00



11-Apr-2023	KG	Follow-up email to the lender; Correspondence with Ryan Trainer of McLennan Ross regarding the Sale and Vesting Order ("SAVO") application; Bind liability coverage; Call with Dave of the Companies regarding the equipment listing and access to the Property; Give instructions to Steve Barlott regarding Thursday tours;	.40	220.00
13-Apr-2023	SB	Meet with Brian Moskowitz of Moskowitz Capital, Joshua Sugar of Workingman, Brenda Compton of Compton Appraisals, and Dave of the Companies to view all equipment on the list;	6.00	1,800.00
13-Apr-2023	IS	Review booking letter and send calendar invites for the upcoming Application; Prepare and edit miscellaneous correspondence;	1.80	369.00
13-Apr-2023	KG	Correspondence with Steven Barlott regarding moving quotes for the equipment across the street and an update on the equipment tour; Email correspondence to the Company regarding outstanding CRA information and balances;	.40	220.00
14-Apr-2023	SB	Meet Corey Laporte of Wingenback Ltd. at the warehouse across the street where the scissor lift and additional lab equipment were being stored and make arrangements to have the items moved to the main building; Coordination of move for Monday, April 17, 2023;	2.00	600.00
17-Apr-2023	SB	Meet Wingenback Ltd. at the warehouse across the street to have the scissor lift and additional lab equipment moved to the main building;	4.00	1,200.00
17-Apr-2023	KG	Review indemnity and provide comments to Ryan Trainer of McLennan Ross; Follow-up email to the lender regarding insurance, property checks, equipment listing, and other outstanding items;	.60	330.00
18-Apr-2023	KG	Review Proof of Claim ("POC") from CRA regarding import taxes;	.30	165.00



		Execute indemnity; Review and approve moving invoice;		
19-Apr-2023	SB	Review and pay Wingenback Ltd. move invoice;	.10	30.00
20-Apr-2023	CS	Forward voicemall to Kristin Gray regarding an interested party;	.10	13.90
20-Apr-2023	KG	Correspondence from various parties interested in the assets; Call with Jerritt Pawlyk of DLA Piper regarding the status of the ROP;	.10	55.00
21-Apr-2023	KG	Follow up with the company on the CRA amounts; Review summary of CRA amounts provided by the Company;	.40	220.00
24-Apr-2023	SB	Review and edit various correspondence;	.30	90.00
24-Apr-2023	KG	Various correspondence regarding the finalization and timeline of the ROP process; Correspondence with Ryan Trainer of McLennan Ross regarding the change of Court date;	.50	275.00
25-Apr-2023	SB	Prepare appendices for ROP;	.30	90.00
25-Apr-2023	KG	Review and finalize ROP; Various correspondence with the lender and Steven Splinter of the Companies regarding the pickup of equipment in police possession; Call with Edmonton Police Service ("EPS") regarding authorization to release equipment; Edit and finalize various correspondence; Call with Josh Sugar of Workingman. regarding the ROP and auction proposal; Various correspondence to confirm new Court date; Send ROP to GD Auctions and Workingman; Give instructions to Isobel Smith to do a website update and to Maha Shah to send out the ROP;	3.00	1,650.00
26-Apr-2023	IS	Post website update;	.80	164.00
26-Apr-2023	KG	Various correspondence to EPS regarding authorization to release equipment; Review website update; Call with Josh Sugar of Workingman regarding the timeline for an auction;	.40	220.00



27-Apr-2023	IS	Edit and finalize miscellaneous correspondence;	.50	102.50
27-Apr-2023	KG	Call with Devin Norris of Ritchie Bros. Auctioneers ("Ritchie Bros.") regarding the equipment; Email correspondence to EPS regarding authorization to release the equipment; Finalize correspondence;	.40	220.00
28-Apr-2023	KG	Correspondence from EPS; Give instructions to Steven Barlott to coordinate the move;	.10	55.00
	TOTAL		31.90	13,159.40



INVOICE SUMMARY		
PROFESSIONAL FEES		\$13,159.40
DISBURSEMENTS		
Equipment Move	1,305.00	
Contractor Costs	1,012.50	
Security	1,114.00	
Change of Locks	170.00	
	<del></del>	3,601.50
GST on Professional Fees	657.97	
GST on Taxable Disbursements	180.08	
		838.05
TOTAL THIS INVOICE		
	_	\$17,598.95

The time incurred by members of the staff of MNP Ltd. on this assignment regarding the Companies for the period April 1, 2023, to April 30, 2023, was as follows:

#### **FEE SUMMARY**

			Hourly	
			Rate	Total
Staff	Position	Hours	\$	\$
Kristin Gray	Senior Vice President	15.60	550.00	8,580.00
Steven Barlott	Senior Consultant	12.70	300.00	3,810.00
Maha Shah	Consultant	0.40	300.00	120.00
Isobel Smith	Administration	3.10	205.00	635.50
Carla Schillreff	Administration	0.10	139.00	13.90
Time Billed		31.90	412.52 *	13,159.40
(*Average)				





#### INVOICE

Banking Services :

ATM Deployments \* Surround Systems \* Physical Security Equipment \* Branch Relocations industrial Moving:

High Value Equipment \* Printing Presses and Medical Equipment - UPS Systems

Corporate Headquarters

Bay F, 707 Barlow Trail SE Calgary, Alberta, Canada T2E BC2 Phone (403) 221-8120 Fax (403) 291-5114 Invoice Inquiries: accounting@wingenback.com

MNP Ltd.

Accounts Payable 10235 - 101 Street NW

Edmonton, AB T5J 3G1

Canada

Technologies inc

157269 Page 1 of 1

Invoice Date

Involce No

4/17/2023

Terms Customer ID

CCD Only MNPL-D-00001

Invoice Amount

\$1,370.25

Job: Job Site : 10111195 Radient

TRIBR : RADIENT

CAN

Customer PO#:

Shipped Via :

Wingenback Reference # :

EW35547 Not Applicable

Job Contact :

Scope of Work :

Job Phone :

7804551155

Edmonton

4035 - 101 Street NW

Apr 17: Load equipment and traval to site to load contents from office space and (1) lift, transport across the street to

larger Radient location, offload and place.

City 1,00 Amount

Total

PRC-LABOUR

Moving & installation

1 305 00

1,305.00

Interest of 2% per month charged on overdup accounts

Sublotei

1,305.00

GST

B5 25

GST Registration: 78019 0138 RT0001

Total

\$1.370.25

Calgary

Tel: (403) 221-8120

Edmonton Tel (750) 458-2898

Vancouver Tel: (804) 513-0035 Toronto

Tel: (905) 876-0280

Atlantic

Tel: (902) 407-4030

Fex: (403) 291-5114

Fax: (780) 489-9001

Fax: (604) 513-1448

Fax: (905) 876-0290

Fax: (902) 407-4031

## **Steven Barlott**

From:	WINGENBACK LTD. <esp_receipt@moneris.com></esp_receipt@moneris.com>
Sent:	April 20, 2023 8:17 AM
To:	Steven Barlott Transaction Resoirt De Not Books
Subject:	Transaction Receipt - Do Not Reply
attachments.	rom outside of the MNP network. Be cautious of any embedded links and/or rovient pas du réseau de MNP. Méfiez-vous des liens ou pièces jointes qu'il pourrait
WINGENBACK LTD.	
Windenback Elbi	
TRANSACTION RECORD	
APPROVED	
TYPE PURCHASE	
ORDER ID 157269	
AMOUNT (CAD) \$1370.25	
CARD NUM **** ****	4025
ACCOUNT VISA	
DATE Apr 20 2023 08:16A	M
REF NUM 66589383001083	
AUTH CODE 08849N	
***************************************	Herocke
APPROVED - THANK YOU	027
****************	<del></del>

Please keep this email as your transaction receipt.

This receipt has been sent from an unmonitored email account.

# **FORESITE MAINTENANCE**

#### **AND INSPECTIONS**

#### INVOICE

MNP Ltd. Receiver of Radient Technologies Inc. C/O Kristin Gray BILL TO

gan a garagina <del>gandaha Mala</del>nda ayan gan gan bahasan da baha gan gan gan 1900 - Andrew Mark Malanda Angrik ayan gan gan gan kan da gan gan gan sa sa sa bahasa sa sa sa sa sa sa sa sa s

Invoice # 20235 Invoice Date March 26, 2023

DATE WORK COMPLETED	Work drois N	MER ICO ANNESS
March 24, 2022,	· N/A	4035 101 St NW, Edmonton, AB T6E 0A4
L	i	

di.		<b>PERPON</b>	OUT! LUICE	JUIRE
4	Weekly Site Inspection	Visit and Inspect Radient Property (South Building) March 24 to April 24 2023.	\$50.00	\$200.00
1	Cover broken/exposed garage door windows	Cover broken and exposed garage door windows (3) on the north side of the property. 2.5 hrs. Materials: \$150.00.	\$95.00/Hr	\$387.50

Raid by Resonal
enail transfer.

Approved by
Kristin Gray:

(780) 984-1316
Loote.r6@gmail.com

**FORESITE MAINTENANCE AND** INSPECTIONS \*Please make cheque payable to: Lyle Cote

> #205 - 2606 209th Street Edmonton AB T6J 3S9

PHONE E-MAIL Lcote.r6@gmail.com

# TO SERVICE STREET OF THE PARTY **FORESITE MAINTENANCE AND INSPECTIONS**

#### INVOICE

	MNP Ltd. Receiver of Radient
BILL TO	Technologies Inc.
	C/O Kristin Gray

Invoice #	20236
Involce Date	April 3, 2023

CATE WORK COMPLETED	WORK ORDER NUMBER	or annex
April 2, 2023,	N/A	4035 101 St NW, Edmonton, AB T6E 0A4
[	;	

OY .	TEN CONTRACTOR		UNIT PRICE	TOTAL
2	Weekly Site Inspection	2 Weeks Credit : Visit and inspect Radient Property (South Building) April 10 to April 24 2023.	\$-50.00	\$-100.00
 L	Cover exposed access locations	Cover exposed/damaged access locations(3)on the south and west side of the property. 4 hrs. Materials: \$145.00.	\$95.00/Hr	\$525.00
		Na reen		
			Belance Due	\$425.00
		Rod	oil than	
		ew	ail Ha	nsfer.
				<b>4</b> l
CTIONS	FENANCE AND eque payable to:		Appr	oved by With C
		#205 – 2605 209 <sup>th</sup> PHONE (780) 984-13: Street Edmonton AB E-MAIL Lcote.r6@gm	16 ail.com	(

FORESITE MAINTENANCE AND INSPECTIONS \*Please make cheque payable to: Lyle Cote



3204 74 Street Northwest | Edmonton, Alberta T6K 1J6 587-400-4445 | alex@onguardlockandsafe.com | www.onguardlockandsafe.com

RECIPIENT:

MNP LTD.

Suite 1300, 10235 101 Street NW Edmonton, Alberta T5J 3G1

SERVICE ADDRESS:

4035 101 Street Northwest Edmonton, Alberta T6E 0A4

Invoice #159	
Issued	Mar 23, 2023
Due	Mar 23, 2023
Paid	Mar 23, 2023
Total	\$178.50

#### For Services Rendered

PRODUCT / SERVICE	DESCRIPTION	оту.	UNIT PRICE	TOTAL
Labour (30 Minutes)	Labour to rekey a Sargent rim cylinder and adjust the position of the strike plate on the east-most north facing door.	1	\$45.00	\$45.00
6275LA	Sargent Original Key (Cut)	6	\$7.50	\$45.00
Truck Charge - Edmonton - Daytime	Truck Charge - Edmonton - Daytime	1	\$80.00	\$80.00

Thank you for your business. Please contact us with any questions regarding this invoice.

G.S.T. Registration No.: 706179603RT0001

Approved by Kristingstry:

Va.

 Subtotal
 \$170.00

 G.S.T. (5.0%)
 \$8.50

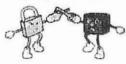
 Total
 \$178.50

 Paid
 -\$178.50

 Invoice balance
 \$0.00

 Account balance
 \$0.00





3204 74 Street Northwest | Edmonton, Alberta T6K 1J6 587-400-4445 | alex@onguardlockandsafe.com | www.onguardlockandsafe.com

RECIPIENT:

MNP LTD.

Suite 1300, 10235 101 Street NW Edmonton, Alberta T5J 3G1

Transaction date Mar 23, 2023

Receipt for Payment Amount: \$178.50

Transaction date: Mar 23, 2023 Method of payment: Credit Card

## ON GUARD LOCK AND

SAFE

3204 74 STREET NW EDMONTON, AB T6K 1J6 78.22921191

Cashier: ALEX GARSTAD

Transaction 000098 Invoice #: 159

Total

CA\$178.50

CREDIT CARD SALE CA\$178.50 AMEX 4003

Data is all in a day for atom

Retain this copy for statement validation

23-Mar.-2023 10:30:05a.m.
CA\$178.50 | Method:
CONTACTLE\$6 |
AMERICAN EXPRESS
XXXXXXXXXXXX4003
Reference ID: 308200500523
Auth ID: 824591
MID: \*\*\*\*\*\*\*\*2532
AID: A000000025010801
AthNtwkNnt: AMEX
NO CAROHOLDER VERIFICATION

Online: https://clover.com/p /HQDE (ET7W6NHJ Security Force Services Ltd. 4755-154 AVE, NW, Edmonton 7540CA

359021

TAX REG NO March 04, 2023 T: 780-340-7375 840459663-0001 SHIP TO EXPÉDIER À MNP HL Attention: Stepen Barlott. ADDRESS 10235-101 Street NW Edmonton AS. 75 J 391 QUEFORLES OFFER COMMANDE DU CUENT SOLD BY VENDU PAR TERMS CONDITIONS DESCRIPTION Security Service charges for providing security at 4035-101 Street NW. Flower. Date Time IN Time out 17-00 March 31. Through 09:00 AM April 02,9023 27-85 40 1114-00 April 02/2023 Will Pick 4P Cheque. Gave to Carolina April 4 - Will Write che, tomorrow. X 55 + 70 STAPLES DID INVOICE FACTURE

> PIS Pay for IMPRESS

Radien+ (P)
Contractor Costs
41,169.70



June 20, 2023

Moskowitz Capital Mortgage Fund II Inc. 6 Eglinton Ave E, Suite 301 Toronto, ON M4P 1A6

**Attention: Brian Moskowitz** 

Re: In the Matter of the Receivership of 1631807 Alberta Ltd. and Radient Technologies

Inc.(the "Companies")
Client Number: 1013477

Please find enclosed our Invoice No. 11098810 for professional services rendered for the period of May 1, 2023, to May 31, 2023, which we trust you will find in order.

If you have any questions, please don't hesitate to contact us.

Yours very truly,

MNP Ltd.

Receiver of 1631807 Alberta Ltd. and Radient Technologies Inc.

Per:

Kristin Gray, CPA, CA, CIRP, LIT

Enclosure



Invoice No: 11098810 GST No: 10369 7215

Moskowitz Capital Mortgage Fund II Inc. 6 Eglinton Ave E, Suite 301 Toronto, ON M4P 1A6

Attention: Brian Moskowitz

Re: In the Matter of the Receivership of 1631807 Alberta Ltd. and Radient Technologies

Inc.(the "Companies")
Client Number: 1013477

PROFESSIONAL SERVICES RENDERED by members of the staff of MNP Ltd., as Receiver of the Companies, for the period May 1, 2023, to May 31, 2023, including inter alia the following:

DATE	STAFF	DESCRIPTION	TIME	FEE
01-May-2023	MS	Email the Request for Offers to Purchase ("ROP") to various interested parties;	.30	90.00
01-May-2023	SB	Make arrangements with Wingenback Ltd. ("Wingenback") regarding the inspection and move of equipment items in Edmonton Police Service ("EPS") custody;	.50	150.00
01-May-2023	IS	Post case website update; Request cheque from Carolina Bautista for payment of insurance;	1.30	266.50
01-May-2023	KG	Coordinate tour with GD Auctions & Appraisals ("GD") and Mirterra Corp ("Mirterra"); Approve insurance invoice for payment; Follow up with Maha Shah on tour interest;	.20	110.00
02-May-2023	MS	Phone call with a potential purchaser;	.40	120.00
02-May-2023	SB	Correspondence with Wingenback regarding moving the equipment in EPS custody to the Companies, correspondence with EPS and the Companies regarding the same;	.30	90.00
02-May-2023	KG	Attendance at the Property for asset tours; Correspondence with Mickey Spencer of GD regarding their offer; Correspondence with Paladin Security regarding the status of security; Correspondence with Steven Barlott	1.50	825.00



		regarding the pickup of equipment at EPS; Review legal invoice for approval;		
03-May-2023	CB	Prepare cheque for payment of insurance;	.10	38.10
03-May-2023	MS	Email exchange with Chad Guay of McDougall Auctions ("McDougall")	.20	60.00
03-May-2023	SB	Attend the EPS Property and Exhibit Unit for equipment release, attend Radient to oversee the delivery of equipment;	3.50	1,050.00
05-May-2023	MS	Various correspondence with Trevor Brown of Wave Control;	.40	120.00
05-May-2023	MS	Various correspondence with Harsanjit Bhullar of AdaptX regarding a site visit;	.40	120.00
08-May-2023	MS	Email exchange with Trevor Brown of Wave Control regarding the sales process;	.20	60.00
08-May-2023	MS	Site visit to meet Chad Guay of McDougall and Harsanjit Bhullar of AdaptX;	3.50	1,050.00
08-May-2023	KG	Correspondence with Maha Shah regarding site tours; Email correspondence regarding security and insurance inspections;	.20	110.00
09-May-2023	SB	Prepare and send details of recovered equipment to Workingman Capital Corp ("Workingman") and GD;	.50	150.00
09-May-2023	KG	Email correspondence to Rush Management Ltd. regarding security and insurance inspections;	.20	110.00
10-May-2023	MS	Email exchange and phone call with Harsanjit Bhullar of AdaptX regarding various equipment details;	.40	120.00
10-May-2023	KG	Email correspondence to the Companies and Maha Shah regarding equipment questions from an auctioneer; Correspondence with Ryan Trainer of McLennan Ross LLP ("McLennan Ross") regarding certain VIN number irregularities;	.20	110.00
11-May-2023	SB	Correspondence with Ryan Trainer of McLennan Ross regarding serial numbered equipment. Correspondence with Dave Rohachuk of the Companies regarding the same;	.50	150.00
11-May-2023	KG	Correspondence to the Companies regarding viewing of certain lab equipment;	.20	110.00



		Correspondence with Steven Barlott and Ryan Trainer of McLennan Ross regarding the forklift Serial Number discrepancy;		
12-May-2023	MS	Email exchange with Josh Sugar of Workingman;	.20	60.00
12-May-2023	MS	Various correspondence with Harsanjit Bhullar of AdaptX;	.40	120.00
12-May-2023	MS	Prepare a summary of offers to purchase;	1.00	300.00
12-May-2023	KG	Review Workingman proposal; Correspondence to Josh Sugar of Workingman regarding the buyer premium; Review GD proposal; Review McDougal proposal; Correspondence with Maha Shah regarding preparing a summary of offers;	.50	275.00
16-May-2023	SB	Draft Receiver's First Report to Court ("First Report"); Prepare details of centrifuge and send to Ryan Trainer of McLennan Ross for review;	3.50	1,050.00
16-May-2023	KG	Review summary of offers. Email correspondence to the lender regarding the same; Correspondence with Ryan Trainer of McLennan Ross regarding the auction agreement and Workingman proposal; Follow up with the CRA trust auditor on the status and timing of the audit; Review the Exhibit L addition for the centrifuges;	1.20	660.00
17-May-2023	SB	Edits to the First Report;	4.00	1,200.00
17-May-2023	IS	Various edits to miscellaneous correspondence. Finalize the same;	.50	102.50
17-May-2023	KG	Call with Josh Sugar of Workingman regarding support of the auction proposal; Correspondence with Ryan Trainer of McLennan Ross regarding the auction agreement; Edit and finalize various correspondence;	.40	220.00
18-May-2023	SB	Review and edits to First Report with Kristin Gray;	1.00	300.00
18-May-2023	KG	Review the auction agreement. Forward to Josh Sugar of Workingman for comment; Review and edit First Report; Discuss the auction agreement with Ryan	3.00	1,650.00



		Trainer of McLennan Ross; Review changes to the auction agreement;		
19-May-2023	KG	Final changes and edits to the auction agreement; Correspondence with Josh Sugar of Workingman regarding Court approval and initiation date; Call with Dave Rohachuk of the Companies regarding the removal of third-party equipment;	.50	275.00
23-May-2023	SB	Finalize the First Report. Prepare the same for Court submission;	2.00	600.00
23-May-2023	KG	Edit and execute the First Report; Finalize Auction Agreement; Review application materials;	.70	385.00
24-May-2023	KG	Receive correspondence from the security guard regarding a break-in; Update internal notes on file; Correspondence with the Company regarding the removal of third-party equipment; Website update; Correspondence to McDougal regarding the acceptance of another Proposal;	.30	165.00
25-May-2023	SB	Meet Dave Rohachuk of the Company at the Property to supervise the move of non- listed equipment; Return to office to pick up keys due to the key being removed from the lockbox by Colliers International ("Colliers");	3.00	900.00
25-May-2023	KG	Call with Kurtis Letwin of Dentons LLP ("Dentons") counsel to Agriculture Financial Services Corporation ("AFSC") regarding CRA balances and the application for a Sale and Vesting Order ("SAVO"); Various correspondence with Colliers regarding the location of the key at the Property;	.40	220.00
26-May-2023	iS	Post website update;	.70	143.50
26-May-2023	KG	Various correspondence with the Company and Paul Pedersen of Nextleaf Solutions ("Nextleaf") regarding an unsecured debt and attendance at the Property. Call with Ryan Trainer of McLennan Ross regarding the same; Receive correspondence from Ryan Trainer of McLennan Ross to Kirwin LLP regarding	1.00	550.00



		the Receiver's role over the inventory; Review the McLennan Ross legal opinion in respect of AFSC and Moskowitz;		
29-May-2023	KG	Attendance at the Property to meet Paul Pedersen of Nextleaf and ensure assets are not removed;	1.00	550.00
30-May-2023	SB	Meet Joshua Sugar from Workingman at the Property to review assets for the upcoming auction; Discussions with the staff of the Companies regarding the auction process and requirements for Workingman, update Kristin Gray regarding same; Various correspondence;	3.50	1,050.00
30-May-2023	IS	Post website update;	.40	82.00
30-May-2023	KG	Prepare for and attend the SAVO application; Email correspondence to Josh Sugar of Workingman regarding access, marketing materials, and other auction considerations; Execute Auction Agreement; Website update;	1.00	550.00
31-May-2023	KG	Email correspondence to Nextleaf regarding various allegations against the Companies; Call with Ryan Trainer of McLennan Ross regarding correspondence to the Companies' counsel regarding Nextleaf and issues with equipment in the auction; Email correspondence to the Companies regarding equipment in the auction and the auction process; Update call with Josh Sugar of Workingman;	1.00	550.00
	TOTAL		46.20	16,967.60



INVOICE SUMMARY		
PROFESSIONAL FEES	·	\$16,967.60
DISBURSEMENTS		
Insurance	3,000.00	
Legal Fees and Disbursements	9,243.60	
Office Costs	44.61	
		12,288.21
GST on Professional Fees	848.38	•
GST on Taxable Disbursements	464.41	
		1,312.79
TOTAL THIS INVOICE		
	_	\$30,568.60

The time incurred by members of the staff of MNP Ltd. on this assignment regarding the Companies for the period May 1, 2023, to May 31, 2023, was as follows:

#### FEE SUMMARY

		•	Hourly	<b>T</b> -4-1	
Staff	Position	Hours	Rate \$	Total \$	
Kristin Gray	Senior Vice President	13.50	550.00	7,425.00	
Carolina Bautista	Senior Consultant	0.10	381.00	38.10	
Steven Barlott	Senior Consultant	22.30	300.00	6,690.00	
Maha Shah	Consultant	7.40	300.00	2,220.00	
Isobel Smith	Administration	2.90	205.00	594.50	
Time Billed		46.20	367.26 *	16,967.60	
(*Average)			- <del>-</del>		





#### **Hub International Insurance Brokers**

Phone: (604) 269-1000 (604) 269-1001

Invoice # 304422	20 Page 1 of 1
ACCOUNTNUMBER	DATE
MNPL TDR-02	04/28/2023
BALANGE DUE ON	AMOUNTDUE
04/27/2023	\$3,000.00 CAD

\*\*\*ALL AMOUNTS SHOWN ARE CAD\*\*\*

MNP Ltd. Receiver of certain property owned by 1631807 Alberta Ltd. and Radient Technologies Inc. 10235 101St N.W. Edmonton, AB T5J 3G1

Programs Package			PolicyN	lumber: TBA	Effective: 04/11/20	23 to	10/11/2023
Item#	Effective	Due Date	Trans	Description	See and Supplied Depth of the		Amount
17625961 17625963	04/11/2023 04/11/2023	04/27/2023 04/27/2023	NEWB AFEE	6 Months - CGL Cover Underwriting Fee			\$2,700.00 \$300.00
					Policy Invoice Balance:		\$3,000.00
					Total Invoice Balance:	,	\$3,000.00 CAD

#### 100% Minimum and Retained

Premiums are due and payable on the effective date. Your earliest remittance is appreciated. Policies not required must be returned immediately for cancellation otherwise a time on risk will be charged.

.....

insurance policies, premiums and administration fees may have tax, accounting or legal implications that require further action on your part. Please be reminded that HUB's advice is based sidely on our experience as insurance brokers. It is important for you to consult with your own professional tax, accounting, actuarial or legal advisors for guidance so that you may discharge your legal and tax obligations.

#### PAYMENT OPTIONS

PAY BY CHEQUE

PAY BY ONLINE BANKING

Please remit your payment to:

**HUB** International 400 - 4350 Still Creek Drive Burnaby, BC V5C 0G5

(at participating institutions)

When adding us as a Payee HUB International search using keyword Greater Vancouver

MNPLTDR-02 Your Account Number is: (if code includes a dash or dashes, please exclude) CALL US: 604-269-1000

(you may be eligible for other payment options)

- Monthly Payment Plans
   3rd Party Premium Financing
- \* Electronic Funds Transfer

--- PLEASE RETURN A COPY OF THIS INVOICE WITH YOUR CHEQUE, AND REFERENCE ON THE PAYMENT YOUR INVOICE # 3044220 ---

# **MCLENNAN ROSS**

LEGAL COUNSEL

Date:

April 28, 2023

Client No .:

020993

826830

Matter No.: Bill No .:

20230959 RTT

MNP LTD.

ATTN: KRISTIN GRAY 10235 101 STREET NW

**SUITE 1300** 

EDMONTON, AV T5J 3G1

600 McLennan Ross Building 12220 Stony Plain Road Edmonton, AB T5N 3Y4

Telephone

(780) 482-9200

Fax

(780) 482-9100

Toll-Free

1-800-567-9200

Enquiries E-mail

edmonton@mross.com

Payments E-mail

payments@mross.com

#### RECEIVERSHIP OF RADIENT TECHNOLOGIES AND 1631807 ALBERTA LTD

#### SUMMARY OF ATTACHED ACCOUNT

Total fees, other charges, disbursements and tax for professional services rendered, details of which are attached. FEES: \$9,182.00 OTHER CHARGES: \$24.60 DISBURSEMENTS: \$37.00 TAX: \$462.18 TOTAL DUE: (Payable Canadian Funds) \$9,705.78

EFT (Electronic Funds Transfer) or Wire Transfer instructions for Canadian Funds within Canada

Receiving Bank: Canadian Western Bank, 100,12230 Jasper Avenue, Edmonton, AB TSN 3K3 Receiving Account: 101010437955 Bank ID. 030

Bank Transit: 03029
Bank Transit: 03029
Beneficiary Name: McLennan Ross LLP
Beneficiary Address: 500 McLennan Ross Building: 12220 Stony Plain Rosd, Edmonton, AB TSN 374
Please email: "Matter: 20230959; Invoice: 826830" to payment@mtoss.com

EFT (Electronic Funds Transfer) or Wire Transfer instructions for payments from outside of Canada

Receiving Bank: Royal Bank of Canada, 16909 - 103A Avenue, Edmonton, AB Canada TSP 4Y5 Receiving Account, 104-397-5 Bank ID, 003

Bank Transit 01599 Beneficiary Name: McLennan Ross LLP Swift Code, ROYCCAT2

Swift Code: ROYCG F12
Beneficiary Address: 600 McLennan Ross Building, 12220 Stony Plain Road, Edmonton, AB T5N 3Y4
Please email "Matter: 20230859, Involor: 626630" to payments@mross.com

For Interac e-Money transfers

Please provide the matter number 20230959, bill number 826930and password by small to payments@mross.com

ALL ACCOUNTS ARE PAYABLE UPON RECEIPT. INTEREST AT THE RATE OF 1.5% PER MONTH (18% PER ANNUM) SHALL BE CHARGED ON ALL ACCOUNTS FROM DATE OF BILLING. HOWEVER, NO INTEREST WILL BE CHARGED ON ACCOUNTS PAID WITHIN 30 DAYS.

# **MCLENNAN ROSS**

LEGAL COUNSEL

Date:

April 28, 2023

Client No.:

020993

Matter No .:

20230959 RTT

Bill No .:

826830

ATTN: KRISTIN GRAY

MNP LTD.

10235 101 STREET NW

**SUITE 1300** 

EDMONTON, AV T5J 3G1

600 McLennan Ross Building 12220 Stony Plain Road Edmonton, AB T5N 3Y4

Telephone Fax

(780) 482-9200 (780) 482-9100

Toll-Free

1-800-567-9200

Enquiries E-mail

edmonton@mross.com

Payments E-mail

payments@mross.com

## RE: RECEIVERSHIP OF RADIENT TECHNOLOGIES AND 1631807 ALBERTA LTD

### PROFESSIONAL SERVICES RENDERED WITH RESPECT TO THE ABOVE NOTED MATTER, INCLUDING

09-Mar-23	LNA	0.20	Obtain corporate and PPR searches.
09-Mar-23	RTT	0.40	Review Statement of Claim; Confirmation notice of Default; PPR and Corp searches on debtors.
12-Mar-23	RTT	0.60	Review draft Receivership Application; Review and respond to correspondence re form of order.
13-Mar-23	CPR	0.30	Review updated Receivership Order and respond.
13-Mar-23	RTT	0.40	Discussion with counsel and client re form of receivership order.
14-Mar-23	CPR	0.10	Telephone call with R. Trainer re RBC mortgage issues.
14-Mar-23	RTT	0.40	Review application materials to appoint Receiver.
20-Mar-23	RTT	1.40	Strategy calls with Receiver re proposed changes to order; Email correspondence with counsel for lenders re proposed changes; Review draft changes to redemption order; Confirm form of order acceptable with receiver.
21-Mar-23	RTT	1.90	Prepare for application to appoint Receiver; Attend at application to appoint receiver; Debrief call with Receiver; Direct S. Moeck re preparation of security opinion; Confirm parties with a secured interest were served and direct preparation of a service list.
22-Mar-23	SLM	1.70	Review affidavit and file materials to draft Security Opinion.
22-Mar-23	RTT	0.30	Address subsequent security registrations; Call counsel for lender; Call with Receiver.
24-Mar-23	RTT	1.20	Strategy calls with Receiver; Review correspondence re insurance issues and insurer.
24-Mar-23	CPR	0.20	Strategy call with R. Trainer re dealing with competing claims at PPR.
27-Mar-23	RTT	1.00	Review email from receiver summarizing insurance on property; Discussion with C. Russell of our office; Discussion with Receiver; Email counsel for lender re insurance issues.
27-Mar-23	CPR	0.30	Review email re equipment issues and telephone R. Trainer.
28-Mar-23	RTT	0.60	Ernail correspondence with counsel for lender; Request security documents from AFSC's counsel; Direct S. Moeck of our office re preparing security opinion; Correspondence with Receiver.
02-Apr-23	RTT	0.10	Review correspondence re attempted theft and measures in place to protect property.
03-Apr-23	RTT	0.30	Call with Receiver re security issues on property.
04-Apr-23	RTT	0.50	Review correspondence re scheduling call; Conference call with Receiver re issues on preserving property and proposals.
05-Apr-23	RTT	1.20	Strategy call with receiver re issues on insurance, timing on ROP and application;

Correspondence with counsel for lender.

				·	Bill I	10., 020030
06-Apr-23	RTT	0.10	Review correspondence re insura	nce policies.		
07-Apr-23	RTT	2.60	Email commercial coordinator to a Application; Draft Restricted Cour Letters.	ocok application; Draft Sale a		
08-Apr-23	SLM	2.00	Review materials and draft securi- establish background on 2022 eq	ty opinion. Review Radient's uipment seizures.	public disclosu	re to
10-Apr-23	NER	1.20	Revise Approval and Vesting Ord service letters.	•	Order, Applicati	on and
10-Apr-23	RTT	0.80	Further edits to application materi office re security opinion; Provide			Moeck of our
10-Apr-23	SLM	1.30	Draft security opinion.	•	·	
11-Apr-23	LRR	0.10	Emails with R. Trainer re preparin	g Indemnity agreement.		
11-Apr-23	RTT	0.30	Email correspondence with Court booking application.	coordinator; Email correspon	ndence with co	unsel re
11-Apr-23	NER	1.30	Continue revising application mat	erials.		
12-Apr-23	LRR	1.30	Prepare indemnity agreement re	not insuring property; Send to	R. Trainer for	revi <del>ew</del> .
14-Apr-23	RTT	0.30	Review and edit indemnity agreer			
17-Apr-23	RTT	0.50	Review correspondence re remove indemnity; Seek instructions from indemnity.			
17-Apr-23	CPR	0.20	Revise indemnity.			
21-Apr-23	RTT	0.10	Review correspondence from lend correspondence.	der counsel re RFP timelines	; Review CRA	trust audit
FEES FOR I	PROFESS	BIONAL	SERVICES:			\$9,182.00
OTH	ER CHA	RGES:				
		r printing		13.00		
	Colo	ur Repro	graphic Services	11.60		
Tota	i Taxable	Other C	harges subject to GST:	24.60		
тот	AL OTHE	ER CHAF	RGES:		24.60	
TOTAL FEE	S AND O	THER C	HARGES:			9,208.60
TAX	ABLE DI	SBURSE	MENTS:			
		- Search		9.00		
	Corp	orete Re	gistry - Search	28.00		
Tota	l Taxable	Disburs	ements subject to GST:	37.00		
TOT	AL TAXA	BLE DIS	BURSEMENTS:		37.00	
TOTAL DISI	BURSEM	ENTS:				37.00
SUBTOTAL:						\$9,243.60 462.18
		101 1151	IO COTRICT DAVADI P. /Deschi-	According Sunday		\$9,705.78
IUTALAC	יו זאטטג	rcropit	IG GST/HST PAYABLE: (Payable	Canadian Funds)	-	99,709.76

Page 3 Matter No.: 20230959 Bill No.: 826830

#### THIS IS OUR ACCOUNT HEREIN

McLENNAN ROSS LLP

PER: Ryan Trainer

**RYAN TRAINER** 

E. & O.E.

Blank tax code = 6% GST F12/D12 tax code = 12% HST F13/D13 tax code = 13% HST F14/D14 tax code = 14% HST F15/D15 tax code = 16% HST

# LEGAL COUNSEL

mross.com | Member of Meritas This e-mail may contain confidential information and be subject to solicitor-client privilege. If received in error, please delete an

From: noreply@elavon.com <noreply@elavon.com>

Sent: Tuesday, May 9, 2023 4:06 PM

To: Moksha Veeranah < moksha.veeranah@mross.com >

**Subject: Order Confirmation** 

**Notice: External Email** 

\$9,705.78 CAD

05/09/2023 03:06:05 PM

MCLENNAN ROSS LLP

**Transaction Type** SALE

**Payment** 

**VISA** 

Transaction ID

090523013-D07F487C-4ED1-433A-8453-

ED1C4278A840

**Approval Message** 

**APPROVAL** 

**Approval Code** 

081741

Matter/Re

20230959 RTT

Invoice No 1

826830

Total \$9,705.78 CAD

Bill To

Kristin P. Gray



July 18, 2023

Moskowitz Capital Mortgage Fund II Inc. 6 Eglinton Ave E, Suite 301 Toronto, ON M4P 1A6

Attention: Brian Moskowitz

Re: In the Matter of the Receivership of 1631807 Alberta Ltd. and Radient Technologies

Inc.(the "Companies")
Client Number: 1013477

Please find enclosed our Invoice No. 11139426 for professional services rendered for the period of June 1, 2023, to June 30, 2023, which we trust you will find in order.

If you have any questions, please don't hesitate to contact us.

Yours very truly,

MNP Ltd. Receiver of 1631807 Alberta Ltd. and Radient Technologies Inc.

Per:

Kristin Gray, CPA, CA, CIRP, LIT

Enclosure





Invoice No: 11139426 GST No: 10369 7215

Moskowitz Capital Mortgage Fund II Inc. 6 Eglinton Ave E, Suite 301 Toronto, ON M4P 1A6

Attention: Brian Moskowitz

Re: In the Matter of the Receivership of 1631807 Alberta Ltd. and Radient Technologies

Inc.(the "Companies")
Client Number: 1013477

**PROFESSIONAL SERVICES RENDERED** by members of the staff of MNP Ltd., as Receiver of the Companies, for the period June 1, 2023, to June 30, 2023, including inter alia the following:

DATE	STAFF	DESCRIPTION	TIME	FEE
01-Jun-2023	SB	Correspondence with Joshua Sugar of Workingman Capital Corp. ("Workingman") regarding requirements for the preparation of the auction;	.30	105.00
02-Jun-2023	SB	Correspondence with Steven Splinter of the Companies and Joshua Sugar of Workingman regarding the vault; Send the filed Approval and Vesting Order to Isobel Smith for filing and arrange a website update; Various correspondence;	.50	175.00
05-Jun-2023	SB	Discussion with Brenda Compton of Workingman regarding access to the main building to assess the removal of the walk-in freezer, correspondence with Isabel Lamilla of the Companies regarding the same; Send website update to Isobel Smith regarding the auction details for posting;	.50	175.00
05-Jun-2023	IS	Post website update;	.80	172.80
05-Jun-2023	KG	Correspondence with Josh Sugar of Workingman regarding auction considerations;	.20	120.00
06-Jun-2023	SB	Correspondence with Joshua Sugar of Workingman regarding the auction and requirements from the Companies; Correspondence with Brian Moskowitz of Moskowitz Capital Mortgage Fund II Inc.	.50	175.00



		("Moskowitz Capital") regarding overhead door repairs;		
06-Jun-2023	IS	Post website update. Various correspondence with Liz Zhang regarding the same;	.50	108.00
06-Jun-2023	KG	Review and approve the auction marketing materials and website; Correspondence with Steven Barlott regarding the overhead door repair; Review the website update;	.50	300.00
12-Jun-2023	KG	Email correspondence from Josh Sugar of Workingman regarding auction details;	.10	60.00
13-Jun-2023	SB	Review correspondence from Workingman regarding the auction; Draft correspondence to the Companies regarding important dates and requirements for the auction;	1.00	350.00
13-Jun-2023	KG	Call CRA regarding the status of outstanding GST returns and the property claim; Email correspondence to the Companies regarding GST returns;	.30	180.00
14-Jun-2023	IS	Prepare and edit miscellaneous correspondence;	1.50	324.00
15-Jun-2023	SB	Review miscellaneous correspondence;	.30	105.00
19-Jun-2023	KG	Correspondence to the Companies regarding auction details and the cancellation of licenses by the CRA; Correspondence with Ryan Trainer of McLennan Ross LLP ("McLennan Ross") regarding the same; Edit and finalize various correspondence;	.40	240.00
20-Jun-2023	SB	Various correspondence with Workingman and the Companies regarding preparation for the auction;	.50	175.00
20-Jun-2023	IS	Edit and finalize various correspondence; Various estate banking tasks; Send wire transfer instructions to Workingman;	.80	172.80
20-Jun-2023	KG	Follow up with Steven Barlott on the auction ready items, including the overhead door; Correspondence with Jerritt Pawlyk of DLA Piper LLP ("DLA") regarding the auction date and status of the Companies operations;	.70	420.00



		Email correspondence to Workingman to obtain the Net Minimum Guarantee ("NMG") funds; Correspondence with Jerritt Pawlyk of DLA and Ryan Trainer of McLennan Ross regarding adding additional equipment to the existing auction;		
21-Jun-2023	SB	Correspondence with Brenda Compton and Josh Sugar of Workingman regarding additional equipment for auction; Various correspondence;	.50	175.00
21-Jun-2023	KG	Review consent to equipment addition; Various correspondence with Workingman regarding the addition of certain equipment into the existing auction; Various correspondence with Ryan Trainer of McLennan Ross and Jerritt Pawlyk of DLA regarding the requirement for Court approval to include additional equipment and the strategy with a Consent Order; Correspondence to the Company regarding the location of additional equipment;	.70	420.00
22-Jun-2023	MS	Various correspondence with Jannet Marowitch of Innotech Alberta regarding the auction;	.40	140.00
22-Jun-2023	IS	Send miscellaneous correspondence to the Companies;	.10	21.60
22-Jun-2023	KG	Review Consent Order; Review and edit the Court booking letter and service letter; Correspondence with Ryan Trainer of McLennan Ross regarding the strategy and Consent Order;	.70	420.00
23-Jun-2023	SB	Various correspondence regarding the order to add additional equipment;	.30	105.00
23-Jun-2023	IS	Various estate banking tasks related to an incoming wire transfer. Various correspondence with Josh Sugar of Workingman and Kristin Gray regarding the same; Post various documents to the Receiver's case website;	.70	151.20
23-Jun-2023	KG	Prepare for and attend the application to approve the Consent Order; Email correspondence to Workingman regarding the same;	.50	300.00



	TOTAL		16.80	6,710.00
30-Jun-2023	KG	Follow up with Workingman on auction results; Correspondence with the Companies and Workingman regarding water issues at the Property;	.30	180.00
20-Juli-2023	NG	the auction; Call with Ryan Trainer of McLennan Ross regarding outstanding issues and the Sale and Vesting Order ("SAVO") cross application; Call with Jerritt Pawlyk of DLA regarding the application to expand the Receivership Order; Correspondence with Workers Compensation Board ("WCB") regarding their potential property claim; Email correspondence to McLennan Ross to update the service list;	.00	
27-Jun-2023 28-Jun-2023	IS KG	Post disbursements to Ascend. Prepare cheques for the same; Arrange to mail; Update from Josh Sugar of Workingman on	.30	64.80 360.00
26-Jun-2023	KG	Various correspondence with Josh Sugar of Workingman, Ryan Trainer of McLennan Ross, and Jerritt Pawlyk of DLA regarding access to the main building for inspections, issues with asset preparation, and access going forward. Email correspondence to the Companies regarding the same; Correspondence with Brian Moskowitz of Moskowitz Capital regarding Radient employee supervision and access arrangements; Review auction progress;	1.00	600.00
26-Jun-2023	IS	Post funds received to Ascend. Various correspondence with Kristin Gray regarding the same;	.30	64.80
26-Jun-2023	SB	Calls with Brenda Compton of Workingman, Steven Splinter of the Companies, and Kristin Gray regarding access to the main building, review various correspondence regarding the same;	1.00	350.00
		Correspondence regarding confirmation of NMG; Review and approve invoices for payment;		



INVOICE SUMMARY		
PROFESSIONAL FEES		\$6,710.00
GST on Professional Fees	335.50	335.50
TOTAL THIS INVOICE	_	\$7.045.50

The time incurred by members of the staff of MNP Ltd. on this assignment regarding the Companies for the period June 1, 2023, to June 30, 2023, was as follows:

#### **FEE SUMMARY**

			Hourly	
Staff	Position	Hours	Rate \$	Total \$
Kristin Gray	Senior Vice President	6.00	600.00	3,600.00
Steven Barlott	Senior Consultant	5.40	350.00	1,890.00
Maha Shah	Consultant	0.40	350.00	140.00
Isobel Smith	Administration	5.00	216.00	1,080.00
Time Billed		16.80	399.40 *	6,710.00
(*Average)				





August 17, 2023

Moskowitz Capital Mortgage Fund II Inc. 6 Eglinton Ave E, Suite 301 Toronto, ON M4P 1A6

**Attention: Brian Moskowitz** 

Re: In the Matter of the Receivership of 1631807 Alberta Ltd. and Radient Technologies

Inc.(the "Companies")
Client Number: 1013477

Please find enclosed our Invoice No. 11182286 for professional services rendered for the period of July 1, 2023, to July 31, 2023, which we trust you will find in order.

If you have any questions, please don't hesitate to contact us.

Yours very truly,

MNP Ltd.
Receiver of 1631807 Alberta Ltd. and
Radient Technologies Inc.

Per:

Kristin Gray, CPA, CA, CIRP, LIT

**Enclosure** 



Invoice No: 11182286 GST No: 10369 7215

Moskowitz Capital Mortgage Fund II Inc. 6 Eglinton Ave E, Suite 301 Toronto, ON M4P 1A6

**Attention: Brian Moskowitz** 

Re: In the Matter of the Receivership of 1631807 Alberta Ltd. and Radient Technologies

Inc.(the "Companies")
Client Number: 1013477

**PROFESSIONAL SERVICES RENDERED** by members of the staff of MNP Ltd., as Receiver of the Companies, for the period July 1, 2023, to July 31, 2023, including inter alia the following:

DATE	STAFF	DESCRIPTION	TIME	FEE
04-Jul-2023	MS	Phone call with a potential buyer regarding the auction;	.20	70.00
04-Jul-2023	S SB	Review and approve Wingenback Ltd. ("Wingenback") invoice for payment; Review various correspondence regarding additional equipment for auction;	.30	105.00
04-Jul-2023	s KG	Review auction results. Correspondence with Jerritt Pawlyk of DLA Piper LLP ("DLA") and Brian Moskowitz of Moskowitz Capital Mortgage Fund II Inc. ("Moskowitz Capital") regarding the same; Follow up with CRA on the status of the trust claim; Email correspondence with Ryan Trainer of McLennan Ross LLP ("McLennan") regarding the structure of the second auction and the Receiver's crossapplication; Email correspondence to Josh Sugar of Workingman Capital Corp. ("Workingman") regarding the second auction and various terms; Email correspondence to a creditor regarding the proceedings; Call from the CRA regarding the deemed trust audit and posting time for the Company;	1.50	900.00



05-Jul-2023	SB	Review various correspondence regarding the upcoming Court application and requirements for the Receiver's Second Report to Court ("Second Report");	.30	105.00
05-Jul-2023	KG	Various correspondence with DLA regarding the updated equipment listing and the status of operations;	.40	240.00
07-Jul-2023	KG	Email correspondence from Kevin Hoy of DLA and Ryan Trainer of McLennan Ross regarding the application to expand the scope of the Receivership Order; Review complete equipment listing and correspondence to Kevin Hoy regarding the isolation of new equipment; Correspondence with Ryan Trainer of McLennan Ross regarding the Second Report, the timeline for filing, and the inclusion of operational status;	.40	240.00
10-Jul-2023	IS	Correspondence with the CRA regarding various outstanding returns. Correspondence with Kristin Gray regarding the same;	1.00	216.00
10-Jul-2023	KG	Review CRA property claims. Forward to Ryan Trainer of McLennan Ross; Correspondence with Kurtis Letwin of Dentons LLP ("Dentons"), counsel to Agriculture Financial Services Corporation ("AFSC") regarding the same; Give instructions to Isobel Smith to call CRA regarding the Radient GST account, compliance, and balance confirmation; Review Schedule A to the Moskowitz Affidavit; Forward additional equipment listing to Josh Sugar of Workingman and request supplementary auction proposal; Prepare an outline for the Second Report and give instructions to Steven Barlott regarding the same; Correspondence to DLA regarding the location of the additional equipment.	1.20	720.00
11-Jul-2023	SB	Draft the Second Report;	3.00	1,050.00
11-Jul-2023	IS	Prepare and edit miscellaneous correspondence; Various estate administration tasks; Draft correspondence to the Company	2.00	432.00



		regarding the outstanding GST and Corporate Income Tax filings;		
11-Jul-2023	KG	Review the extension application materials filed by DLA;	.20	120.00
12-Jul-2023	SB	Edits to the Second Report;	2.00	700.00
12-Jul-2023	KG	Review and edit the Second Report; Review supplementary auction proposal from Workingman; Correspondence with Josh Sugar of Workingman regarding a Net Minimum Guarantee ("NMG") and costs; Correspondence with Ryan Trainer of McLennan Ross regarding the form of Sale and Vesting Order ("SAVO") application and the necessity for Confidential Appendices; Email correspondence to Jerritt Pawlyk of DLA and Brian Moskowitz of Moskowitz Capital regarding the supplementary auction proposal;	3.00	1,800.00
13-Jul-2023	SB	Finalize Second Report;	1.50	525.00
13-Jul-2023	IS	Prepare the appendices for the Second Report; Finalize Second Report. Send the same to Ryan Trainer at McLennan Ross; Post disbursement to Ascend. Prepare a cheque for the same; Arrange to mail; Website update;	2.10	453.60
13-Jul-2023	KG	Review draft SAVO application materials; Review auction amending agreement and forward to Josh Sugar of Workingman for comment; Finalize and execute the Second Report; Review the list of unsold auction items from the first auction; Review Affidavit of Brian Moskowitz sworn July 10, 2023; Review filed application materials and give instructions regarding a website update; Send a list of outstanding GST and T2s to the Companies and request the filing thereof;	1.50	900.00
13-Jul-2023	LZ	Prepare GST filing;	.30	64.80
14-Jul-2023	KG	Receive email correspondence from Kevin Hoy of DLA regarding the location and status of additional equipment and cannabis inventory;	.60	360.00



		Correspondence with Ryan Trainer of McLennan Ross regarding third-party equipment on site and strategy with the extension Order; Receive email from Josh Sugar of Workingman regarding the amending agreement and auction costs; Email correspondence from Kevin Hoy of DLA regarding the mechanism to include unknown assets. Discussion with Ryan Trainer of McLennan Ross regarding the same.		
17-Jul-2023	MS	Email exchange with Peggy Sanders of Nine Lions Bioscience regarding the status of the equipment and the auction;	.20	70.00
17-Jul-2023	SB	Correspondence with Josh Sugar and Brenda Compton of Workingman regarding the removal of sold equipment; Correspondence with Cory Kerkhoff of Paladin Security ("Paladin") regarding monitoring service and removal of equipment; Review and edits to various correspondence;	1.00	350.00
17-Jul-2023	IS	Post website update;	.70	151.20
17-Jul-2023	KG	Various correspondence with Workingman and the Companies regarding alarms on the vault and cooler; Email correspondence regarding a contact at Paladin to authorize disarm; Review amended application materials; Instructions regarding a website update;	.50	300.00
18-Jul-2023	SB	Correspondence with Cory Kerkhoff of Paladin regarding outstanding amounts, areas, and equipment monitored;	.50	175.00
18-Jul-2023	KG	Review email from Kevin Hoy of DLA regarding the amended wording to the Order to deal with additional equipment; Edit and finalize various correspondence; Email correspondence to Steven Splinter of the Companies regarding third-party assets on site;	.40	240.00
19-Jul-2023	IS	Post website update;	.70	151.20
19-Jul-2023	KG	Prepare for and attend the application to expand the Receivership Order and approve the supplemental SAVO; Review amendments to the expansion	1.00	600.00



		Order; Various website updates;		
20-Jul-2023	IS	Various estate banking tasks;	.20	43.20
20-Jul-2023	KG	Various correspondence regarding continued access to the facility for Workingman, a listing of High Grade equipment, and the auction agreement; Correspondence with Ryan Trainer of McLennan Ross regarding the High Grade lease and equipment;	.50	300.00
21-Jul-2023	KG	Review changes to the amending auction agreement to deal with the potential of additional equipment. Forward to Workingman for comment;	.30	180.00
24-Jul-2023	IS	Review funds received for payment of Professional Fees; Estate banking tasks; Various correspondence with Kristin Gray regarding the same;	.30	64.80
24-Jul-2023	KG	Call with Josh Sugar of Workingman regarding the auction amending agreement, changes as a result of the Amending Order, the process for adding additional equipment, and the timeline for the second auction;	.40	240.00
25-Jul-2023	IS	Post disbursement to Ascend. Prepare a cheque for the same; Arrange to mail; Phone correspondence with WCB regarding their Proof of Claim ("POC");	.40	86.40
26-Jul-2023	IS	Website update;	.40	86.40
26-Jul-2023	KG	Correspondence regarding security monitoring services and balance owing. Forward to Moskowitz for consideration; Follow up with Steven Splinter on the High Grade walk through; Follow up with Josh Sugar of Workingman on the amending auction agreement. Execute amending auction agreement; Correspondence with Rob Morrison from High Grade regarding equipment on site; Review Special Contracting Ltd. ("Special Contracting") lease; Review legal opinion from McLennan Ross; Correspondence to Moskowitz Capital regarding the additional equipment listing, Special Contracting lease, and removal of	1.00	600.00



	TOTAL		31.40	13,157.40
31-Jul-2023	SB	Discussion with Brenda Compton of Workingman regarding Paladin and cleanup of the Property;	.30	105.00
28-Jul-2023	KG	Correspondence with the Companies and Workingman to confirm work schedule and access; Correspondence regarding hazardous material removal;	.20	120.00
28-Jul-2023	IS	Correspondence with a creditor;	.20	43.20
28-Jul-2023	SB	Various correspondence regarding the second auction;	.20	70.00
28-Jul-2023	KA	Review and approve June 2023 bank reconciliation;	.20	112.00
27-Jul-2023	IS	Various correspondence with a creditor regarding the Receivership;	.20	43.20
27-Jul-2023	RN	Prepare bank reconciliation for June 2023;	.10	24.40
		High Grade assets; Review POC from WCB and give instructions regarding amendment; Website update;		



TOTAL THIS INVOICE	\$13,815.27
GST on Professional Fees	<u>657.87</u> 657.87
PROFESSIONAL FEES	\$13,157.40
INVOICE SUMMARY	

The time incurred by members of the staff of MNP Ltd. on this assignment regarding the Companies for the period July 1, 2023, to July 31, 2023, was as follows:

#### **FEE SUMMARY**

			Hourly			
Staff	Position	11	Rate	Total		
Stan	Position	Hours	\$	\$		
Kristin Gray	Senior Vice President	13.10	600.00	7,860.00		
Karen Aylward	Vice President	0.20	560.00	112.00		
Steven Barlott	Senior Consultant	9.10	350.00	3,185.00		
Maha Shah	Consultant	0.40	350.00	140.00		
Rebecca Namiiro	Senior Administrator	0.10	244.00	24.40		
Isobel Smith	Administration	8.20	216.00	1,771.20		
Liz Zhang	Administration	0.30	216.00	64.80		
Time Billed		31.40	419.03 *	13,157.40		
(*Average)						





### **EXHIBIT B**

## Summary of Receiver's Legal Counsel Invoices and Copies of Invoices

This is Exhibit " " referred to
in the Affidavit of
Sworn before me this 15 day
of Scotember, 2023
A Commissioner for Oaths in and for Alberta
A Commissioner for Saule in and for Pasona

#### ISOBEL NICOLE SMITH

A Commissioner for Oaths in and for Alberta My Commission expires August 31, 2024 Appointee No. 0764665

### In the Matter of the Receivership of 1631807 Alberta Ltd. and Radient Technologies Inc.

#### **Summary of Receiver's Legal Counsel Fees**

#### For the period of March 9, 2023, to August 15, 2023

Firm	Date	Invoice	Fees	Disbursements	Other Charges	GST	Total
McLennan Ross LLP	28-Apr-23	826830	9,182.00	37.00	24.60	462.18	9,705.78
McLennan Ross LLP	23-Jun-23	832716	12,285.50	167.83	120.00	627.67	13,201.00
McLennan Ross LLP	30-Aug-23	837839	10,241.00	94.96	70.00	516.80	10,922.76
			31,708.50	299.79	214.60	1,606.65	33,829.54

LEGAL COUNSEL

MNP LTD. 10235 101 STREET NW SUITE 1300 EDMONTON, AV T5J 3G1 KRISTIN GRAY

Invoice Date:

April 28, 2023

Invoice No.:

826830 020993

Client No.: Matter No.:

20230959 RTT

ATTENTION: GRAY, KRISTIN

#### SUMMARY OF ATTACHED ACCOUNT

RE: RECEIVERSHIP OF RADIENT TECHNOLOGIES AND 1631807 ALBERTA LTD

Proforma Conversion Record

Currency: CAD

Fees

\$9,182.00

Costs (Taxable)

\$61.60

\$9,243.60

**GST** 

\$462.18

**Total Amount Due** 

\$9,705.78

#### G.S.T. #R119415172

ALL ACCOUNTS ARE PAYABLE UPON RECEIPT, INTEREST AT THE RATE OF 1.5% PER MONTH (18% PER ANNUM) SHALL BE CHARGED ON ALL ACCOUNTS FROM DATE OF BILLING; HOWEVER, NO INTEREST WILL BE CHARGED ON ACCOUNTS PAID WITHIN 30 DAYS.

#### SEE REMITTANCE PAGE FOR PAYMENT OPTIONS

Edmonton

Toll-free

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

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 – 48th Street Yellowknife, NT X1A 1N5 Telephone 867 766 7678 Facsimile 867 766 7678 Toll-free 888 836 6684

Invoice No.: Matter No.:

Invoice Date:

April 28, 2023 826830

20230959

#### **Time Detail**

Time Detail					
<b><u>Date</u></b> 09-Mar-2023	<u>Name</u> LNA	<u>Description</u> Obtain corporate and PPR searches.	<u>Hours</u> 0.20	<u>Rate</u> 125.00	<u>Amount</u> 25.00
09-Mar-2023	RTT	Review Statement of Claim; Confirmation notice of Default; PPR and Corp searches on debtors.	0.40	400.00	160.00
12-Mar-2023	RTT	Review draft Receivership Application; Review and respond to correspondence re form of order.	0.60	400.00	240.00
13-Mar-2023	CPR	Review updated Receivership Order and respond.	0.30	675.00	202.50
13-Mar-2023	RTT	Discussion with counsel and client re form of receivership order.	0.40	400.00	160.00
14-Mar-2023	CPR	Telephone call with R. Trainer re RBC mortgage issues.	0.10	675.00	67.50
14-Mar-2023	RTT	Review application materials to appoint Receiver.	0.40	400.00	160.00
20-Mar-2023	RTT	Strategy calls with Receiver re proposed changes to order; Email correspondence with counsel for lenders re proposed changes; Review draft changes to redemption order; Confirm form of order acceptable with receiver.	1.40	400.00	560.00
21-Mar-2023	RTT	Prepare for application to appoint Receiver; Attend at application to appoint receiver; Debrief call with Receiver; Direct S. Moeck re preparation of security opinion; Confirm parties with a secured interest were served and direct preparation of a service list.	1.90	400.00	760.00
22-Mar-2023	SLM	Review affidavit and file materials to draft Security Opinion.	1.70	330.00	561.00
22-Mar-2023	RTT	Address subsequent security registrations; Call counsel for lender; Call with Receiver.	0.30	400.00	120.00

Invoice Date: April 28, 2023 Invoice No.: Matter No.:

826830 20230959

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	Rate	<u>Amount</u>
24-Mar-2023	RTT	Strategy calls with Receiver; Review correspondence re insurance issues and insurer.	1.20	400.00	480.00
24-Mar-2023	CPR	Strategy call with R. Trainer re dealing with competing claims at PPR.	0.20	675.00	135.00
27-Mar-2023	RTT	Review email from receiver summarizing insurance on property; Discussion with C. Russell of our office; Discussion with Receiver; Email counsel for lender re insurance issues.	1.00	400.00	400.00
27-Mar-2023	CPR	Review email re equipment issues and telephone R. Trainer.	0.30	675.00	202.50
28-Mar-2023	RTT	Email correspondence with counsel for lender; Request security documents from AFSC's counsel; Direct S. Moeck of our office re preparing security opinion; Correspondence with Receiver.	0.60	400.00	240.00
02-Apr-2023	RTT	Review correspondence re attempted theft and measures in place to protect property.	0.10	400.00	40.00
03-Apr-2023	RTT	Call with Receiver re security issues on property.	0.30	400.00	120.00
04-Apr-2023	RTT	Review correspondence re scheduling call; Conference call with Receiver re issues on preserving property and proposals.	0.50	400.00	200.00
05-Apr-2023	RTT	Strategy call with receiver re issues on insurance, timing on ROP and application; Correspondence with counsel for lender.	1.20	400.00	480.00
06-Apr-2023	RTT	Review correspondence re insurance policies.	0.10	400.00	40.00
07-Apr-2023	RTT	Email commercial coordinator to book application; Draft Sale and Vesting Order; Draft Application; Draft Restricted	2.60	400.00	1,040.00

RE: RECEIVERSHIP OF RADIENT TECHNOLOGIES AND 1631807

ALBERTA LTD

Invoice Date: Invoice No.: April 28, 2023 826830

Matter No.:

20230959

<u>Date</u>	<u>Name</u>	Description Court Access Order; Start Preparing Brief; Draft Service	<u>Hours</u>	<u>Rate</u>	Amount
08-Apr-2023	SLM	Letters.  Review materials and draft security opinion. Review Radient's public disclosure to establish background on 2022 equipment seizures.	2.00	330.00	660.00
10-Apr-2023	NER	Revise Approval and Vesting Order, Restricted Court Access Order, Application and service letters.	1.20	135.00	162.00
10-Apr-2023	RTT	Further edits to application materials; Email Receiver re indemnity; Email S. Moeck of our office re security opinion; Provide direction re preparation of indemnity.	0.80	400.00	320.00
10-Apr-2023	SLM	Draft security opinion.	1.30	330.00	429.00
11-Apr-2023	LRR	Emails with R. Trainer re preparing indemnity agreement.	0.10	305.00	30.50
11-Apr-2023	RTT	Email correspondence with Court coordinator; Email correspondence with counsel re booking application.	0.30	400.00	120.00
11-Apr-2023	NER	Continue revising application materials.	1.30	135.00	175.50
12-Apr-2023	LRR	Prepare indemnity agreement re not insuring property; Send to R. Trainer for review.	1.30	305.00	396.50
14-Apr-2023	RTT	Review and edit indemnity agreement.	0.30	400.00	120.00
17-Apr-2023	RTT	Review correspondence re removal of certain equipment and CRA audit information; Edit indemnity; Seek instructions from Receiver to proceed; Email lender counsel draft indemnity.	0.50	400.00	200.00
17-Apr-2023	CPR	Revise indemnity.	0.20	675.00	135.00
21-Apr-2023	RTT	Review correspondence from lender counsel re RFP timelines; Review CRA trust audit correspondence.	0.10	400.00	40.00

MNP LTD.
RE: RECEIVERSHIP OF RADIENT TECHNOLOGIES AND 1631807

Invoice Date: Invoice No.: Matter No.: April 28, 2023 826830 20230959

<u>Date</u> Total	<u>Name</u>	Description	<u>Hours</u> 25.20	Rate	<u>Amount</u> \$9,182.00
Timekeeper S	Summary				
<u>Name</u>		Timekeeper Title	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
CPR / CHARL	LES P. RUSSELL	Partner	675.00	1.10	742.50
RTT / RYAN	TRAINER	Partner	400.00	15.00	6,000.00
LRR / LYDIA	ROSEMAN	Associate	305.00	1.40	427.00
SLM / STEPHANIE MOECK		Associate	330.00	5.00	1,650.00
LNA / LYNAE	ANDERSON	Paralegal	125.00	0.20	25.00
NER / NANC	Y RYAN	Paralegal	135.00	2.50	337.50
Total				25.20	\$9,182.00

#### **Cost Detail (Taxable)**

**ALBERTA LTD** 

<u>Description</u>	<u>Amount</u>
Colour Reprographic Services	11.60
Corporate Registry - Search	28.00
Laser printing	13.00
PPR - Search	9.00
Total	\$61.60

Total Amount Due \$9,705.78

THIS IS OUR ACCOUNT HEREIN McLENNAN ROSS LLP

PER: Ryan Trainer

**RYAN TRAINER** 

E. & E. O.

LEGAL COUNSEL

MNP LTD. 10235 101 STREET NW SUITE 1300 EDMONTON, AV T5J 3G1 KRISTIN GRAY

Invoice Date:

April 28, 2023

Invoice No.:

826830

Client No.:

020993

Matter No.:

20230959 RTT

ATTENTION: GRAY, KRISTIN

#### REMITTANCE PAGE

Total Amount Due \$9,705.78

EFT (Electronic Funds Transfer) or Wire Transfer instructions

Please email "Matter: 20230959; Invoice: 826830 to payments@mross.com

Canadian Funds from within Canada

Receiving Bank:

Canadian Western Bank,

100, 12230 Jasper Avenue Edmonton, AB T5N 3K3

Receiving Account: 101010437955

Bank ID:

030 03029

Bank Transit: 0302

Beneficiary Name: McLennan Ross LLP

Beneficiary Address: 600 McLennan Ross Building

12220 Stony Plain Road Edmonton, AB T5N 3Y4 Payments from outside of Canada

Receiving Bank:

Royal Bank of Canada

16909 - 103A Avenue

Edmonton, AB Canada T5P 4Y5 : 104-397-5

Receiving Account: Bank ID: Bank Transit:

003 01599

Beneficiary Name: McLennan Ross LLP

Swift Code: ROYCCAT2
Beneficiary Address: 600 McLennan Ross Building

12220 Stony Plain Road Edmonton, AB T5N 3Y4

For Interac e-Money Transfers

Please provide the matter number: 20230959; Invoice: 826830 and password by email to payments@mross.com

ALL ACCOUNTS ARE PAYABLE UPON RECEIPT, INTEREST AT THE RATE OF 1.5% PER MONTH (18% PER ANNUM) SHALL BE CHARGED ON ALL ACCOUNTS FROM DATE OF BILLING; HOWEVER, NO INTEREST WILL BE CHARGED ON ACCOUNTS PAID WITHIN 30 DAYS.

G.S.T. #R119415172

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

Date:

June 23, 2023

Client No.: Matter No.: 020993 20230959 RTT

Bill No .:

832716

ATTN: KRISTIN GRAY

MNP LTD.

10235 101 STREET NW

**SUITE 1300** 

EDMONTON, AV T5J 3G1

600 McLennan Ross Building 12220 Stony Plain Road Edmonton, AB T5N 3Y4

Telephone Fax

(780) 482-9200

Toll-Free

(780) 482-9100 1-800-567-9200

Enquiries E-mail Payments E-mail edmonton@mross.com payments@mross.com

#### RECEIVERSHIP OF RADIENT TECHNOLOGIES AND 1631807 ALBERTA LTD

#### SUMMARY OF ATTACHED ACCOUNT

Total fees, other charges, disbursements and tax for professional services rendered, details of which are attached. FEES: \$12,285.50 OTHER CHARGES: \$120.00 **DISBURSEMENTS:** \$167.83 TAX: \$627.67

TOTAL DUE: (Payable Canadian Funds)

\$13,201.00

#### EFT (Electronic Funds Transfer) or Wire Transfer Instructions for Canadian Funds within Canada

Receiving Bank. Canadian Western Bank, 100.12230 Jasper Avenue, Edmonton, AB T5N 3K3

Receiving Account 101010437955 Bank ID 030 Bank Transit 03029

Beneficiary Name: McLennan Ross LLP
Beneficiary Address: 600 McLennan Ross Building: 12220 Stony Plain Road, Edmonton, AB T5N 3Y4
Please email "Matter: 20230959; Invoice: 832716" to payments@mross.com

EFT (Electronic Funds Transfer) or Wire Transfer instructions for payments from outside of Canada

Receiving Bank, Royal Bank of Canada, 16909 - 103A Avenue, Edmonton, AB Canada T5P 4Y5
Receiving Account, 104-397-5
Bank ID: 003
Bank Transit, 01599
Beneficiary Name: McLennan Ross LLP
Swift Code, ROYCCAT2
Beneficiary Address, 600 McLennan Ross Building, 12220 Stony Plain Road, Edmonton, AB T5N 3Y4
Please email: "Matter, 20230959, Invoice, 632716" to payments@mross.com

For Interac e-Money transfers

Please provide the matter number 20230959, bill number 832716and password by email to payments@mross.com

ALL ACCOUNTS ARE PAYABLE UPON RECEIPT. INTEREST AT THE RATE OF 1.5% PER MONTH (18% PER ANNUM) SHALL BE CHARGED ON ALL ACCOUNTS FROM DATE OF BILLING HOWEVER NO INTEREST WILL BE CHARGED ON ACCOUNTS PAID WITHIN 30 DAYS

Radient (R) Legal Fles.

EGAL COUNSEL

Date:

June 23, 2023

Client No .:

020993

Matter No.:

20230959 RTT

Bill No .:

832716

ATTN: KRISTIN GRAY

MNP LTD.

10235 101 STREET NW

**SUITE 1300** 

EDMONTON, AV T5J 3G1

600 McLennan Ross Building 12220 Stony Plain Road Edmonton, AB T5N 3Y4

Telephone Fax Toll-Free (780) 482-9200 (780) 482-9100 1-800-567-9200

Enquiries E-mail
Payments E-mail

edmonton@mross.com payments@mross.com

#### RE: RECEIVERSHIP OF RADIENT TECHNOLOGIES AND 1631807 ALBERTA LTD

PROFESSIONAL SERVICES RENDERED WITH RESPECT TO THE ABOVE NOTED MATTER, INCLUDING						
	24-Apr-23	RTT	0.50	Review and respond to correspondence re CRA audit information; Review correspondence from B. Moskowitz re equipment included in sale offer; Review notice of promotion of commercial justice; Email correspondence re rescheduling application to May 28; Write to commercial coordinator requesting rescheduling.		
	25-Apr-23	RTT	0.60	Email correspondence with court coordinator re booking new application date; Call with Receiver; Draft new booking letter; Circulate new booking information.		
	29-Apr-23	RTT	0.10	Review correspondence re insurance policy.		
	02-May-23	RTT	0.20	Review correspondence re cancelation of security coverage.		
	03-May-23	RTT	0.30	Review correspondence and insurance documents received by the broker.		
	08-May-23	RTT	0.10	Review correspondence re security issues.		
	10-May-23	RTT	0.20	Email correspondence with Receiver re locating VINs for two assets.		
	14-May-23	SLM	0.80	Revise security opinion to address serial numbers and finalize draft.		
	16-May-23	RTT	3.50	Request copy of proposal; Prepare auction agreement; Review and edit security opinion; Edit application materials; Submit restricted court access order e-request through portal; Review correspondence to lender.		
	17-May-23	LRR	1.80	Revise auction agreement; Send to R. Trainer for review.		
	17-May-23	RTT	1.60	Correspondence with commercial clerk re filing deadline; Review research; Further edits to security opinion.		
	17-May-23	CPR	0.10	Review auction agreement and respond.		
	17-May-23	SJC	0.50	Memo re case law on Order Approving Sale and Vesting Title for S. Moeck		
	18-May-23	CPR	0.30	Review Sale and Vesting Order.		
	18-May-23	RTT	1.80	Strategy meeting with C. Russell re form of auction agreement and approval and vesting order; Review edits from auctioneer and make changes; Edit Sale and Vesting Order; Edits to materials.		
	18-May-23	CPR	0.50	Review memo and auction agreement and respond to R. Trainer.		
	18-May-23	SLM	3.00	Draft Bench Brief re Orders to approve sale, sealing order and fees.		
	19-May-23	RTT	0.90	Review and address further proposed changes to auction agreement; Send Receiver draft materials.		
	22-May-23	RTT	3.50	Review and edit Receiver's Report; Final edits to application, orders and brief; Update service list; Circulate final copy of Auction Agreement; Edit Brief; Correspondence with Receiver.		
	23-May-23	RTT	2.50	Final edits to application materials; Review and edit security opinion; Call with Receiver.		

Page 2 Matter No.: 20230959 Bill No.: 832716

**CLIENT COPY** 

04.04				****			
24-May-23	RTT	0.80	Final edits to security opinion.				
26-May-23	RTT	1.40	Address service issues; Review correspondence re efforts by unsecured creditor to improperly seize equipment; Strategy call with client; Email correspondence with counsel for debtors.				
29-May-23	RTT	2.20	Send confidential appendices to AFSC; Prepare speaking notes; Approve form of Affidavi of Service.				
30-May-23	RTT	2.40	Further preparation for application; Attend in chambers to speak to application to approvale and vest title; Debrief with Receiver; Direct service of Order.				
31-May-23	RTT	0.50	Review correspondence re issues with getting auction equipment separated; Review correspondence re allegations of criminal activity being made by Nextleaf Distillate; Forward correspondence to counsel for Radient.				
02-Jun-23	RTT	0.10	Review correspondence re vau				
14-Jun-23	RTT	0.10	•		dina for comple	tion of auction.	
19-Jun-23	RTT	0.30	Review correspondence re access to building for completion of auction.  Review correspondence from CRA re termination of CRA licenses to operate cannabis business; Review correspondence from Receiver ensuring items organized for auction prior to June 26.				
20-Jun-23	RTT	0.70	Call with Receiver re expanded re addition of remaining person correspondence with Receiver.	scope of a al property	receivership ord to scope of red	der; Call with coun ceivership order; E	sel for lender Email
21-Jun-23	RTT	0.20	Call with Receiver re issue on in	cluding a	dditional assets	to auction agreer	nent.
SUMM				\$ RATE	HOURS	\$ FEES	
CPR			SSELL, K.C.	675.00	0.90	607.50	
LRR RTT	LYDIA RO RYAN TR			305.00	1.80	549.00	
SJC	STEPHAI		N	400.00 150.00	24.50 0.50	9,800.00 75.00	
SLM	STEPHAI			330.00	3.80	1,254.00	
FEES FOR	PROFESS	SIONAL S	SERVICES:				<b>\$12,285</b> .50
	HER CHA		SERVICES.				ψ (2,200.30
	i ase	r printing			85.00		
			graphic Services		25.00		
		er Costs			10.00		
Tot	ai Taxable	Other C	harges subject to GST:		120.00		
то	TAL OTHE	R CHAR	RGES:			120.00	
TOTAL FE	ES AND O	THER CI	HARGES:				12,405.50
			URSEMENTS: alf as agent)				
	Cour	t House -	- Filing		20.00		
TO	TAL NON-	TAXABL	E DISBURSEMENTS:			20.00	
TA	XABLE DI						
	Digita	al Printing		1	13.00		
		Express - Search			11.00		
		- Searcn eries	1		21.00 84.89		
					37.00	_	6 T #D44644=
						G,	S.T. #R119415

Page 3

Matter No.: 20230959

Bill No.: 832716

Postage Federal Bankruptcy Searches 1.94
Formula Taxable Disbursements subject to GST: 147.83

TOTAL TAXABLE DISBURSEMENTS: 147.83

TOTAL DISBURSEMENTS: 167.83

SUBTOTAL: \$12,573.33

TOTAL ACCOUNT INCLUDING GST/HST PAYABLE: (Payable Canadian Funds)

\$13,201.00

627.67

THIS IS OUR ACCOUNT HEREIN

McLENNAN ROSS LLP

**TOTAL GST/HST:** 

PER: Ryan Trainer

**RYAN TRAINER** 

E. & O.E.

Blank tax code = 5% GST F12/D12 tax code = 12% HST F13/D13 tax code = 13% HST F14/D14 tax code = 14% HST F15/D15 tax code = 15% HST

LEGAL COUNSEL

MNP LTD. 10235 101 STREET NW SUITE 1300 EDMONTON, AV T5J 3G1 KRISTIN GRAY

Invoice Date:

August 30, 2023

Invoice No.:

837839

Client No.: Matter No.: 020993 20230959 RTT

ATTENTION: GRAY, KRISTIN

#### SUMMARY OF ATTACHED ACCOUNT

#### RE: RECEIVERSHIP OF RADIENT TECHNOLOGIES AND 1631807 ALBERTA LTD

Total fees, other charges, disbursements and tax for professional services rendered, details of which are attached.

Currency: CAD
Fees \$10,241.00
Costs (Taxable) \$94.96

\$10,335.96

GST \$516.80

\$10,852.76

Costs (Non-Taxable) \$70.00

#### G.S.T. #R119415172

ALL ACCOUNTS ARE PAYABLE UPON RECEIPT, INTEREST AT THE RATE OF 1.5% PER MONTH (18% PER ANNUM) SHALL BE CHARGED ON ALL ACCOUNTS FROM DATE OF BILLING; HOWEVER, NO INTEREST WILL BE CHARGED ON ACCOUNTS PAID WITHIN 30 DAYS.

#### SEE REMITTANCE PAGE FOR PAYMENT OPTIONS

Edmonton		Calgary		Yellowknife	
600 McLennan Ross Building 12220 Stony Plain Road		1900 Eau Claire Tower 600 – 3 <sup>rd</sup> Avenue SW		301 Nunasi Building 5109 – 48 <sup>th</sup> Street	
Edmonton, AB T5N 3Y4		Calgary, AB			NT X1A 1N5
Facsimile	780 482 9200 780 482 9100	Telephone Facsimile	403 543 9120 403 543 9150	Telephone Facsimile	867 766 7677
Toll-free	800 567 9200	Toll-free	888 543 9120	Toll-free	867 766 7678 888 836 6684

RE: RECEIVERSHIP OF RADIENT TECHNOLOGIES AND 1631807 ALBERTA LTD

Invoice No.: Matter No.:

August 30, 2023

Invoice Date:

837839 20230959

#### **Time Detail**

rime Betail				
<u>Date</u> 21-Jun-2023	<u>Name</u> RTT	Description  Follow up calls with Receiver; Call with lender counsel re adding additional asset and expansion of receivership order; Consider structure of adding additional asset to ongoing auction; Review and respond to correspondence re July court date; Email commercial coordinator seeking to secure time on commercial list; Review correspondence from auctioneer.	<u>Hours</u> 1.50	<u>Amount</u> 600.00
22-Jun-2023	RTT	Draft consent order to add additional piece of equipment to sale list; Correspondence with lenders counsel; Circulate form of order to senior secured lenders and debtor; Correspondence with commercial coordinator; Draft booking letter including background on matter; Draft letter to service list; Email commercial coordinator booking letter; Email service list; Follow up with debtor counsel re execution of consent order; Call with Receiver; Prepare notes for application.	3.20	1,280.00
23-Jun-2023	RTT	Appear before Commercial Justice to enter order adding new asset to current auction; Debrief call with Receiver; Direct service of new order.	0.50	200.00
26-Jun-2023	RTT	Review email re updated service list; Call with Receiver re no one on site from Radient at auction; Leave message counsel for Radient re dealing with access; Send follow up email to M. Kirwin re issue of access; Call with Receiver re new break and entry to building and issues with cannabis products left in equipment listed for sale and issues with removal; Review correspondence.	1.40	560.00
27-Jun-2023	RTT	Call with Receiver re status of auction and onsite staffing.	0.30	120.00
28-Jun-2023	RTT	Review email requesting updated service information for WCB.	0.10	40.00
04-Jul-2023	NER	Receive instructions from R. Trainer; Prepare application materials for an Order Approving Sale and Vesting Title.	1.30	175.50
04-Jul-2023	RTT	Review correspondence re earlier results from auction; Email counsel for lender	0.90	360.00

Invoice Date: August 30, 2023 Invoice No.: 837839 Matter No.: 20230959

<u>Date</u>	<u>Name</u>	Description requesting status update on pending application to expand scope of receivership order; Review correspondence from counsel for secured lender; Instruct paralegals on preparation of cross application materials for new sale and vesting order; Email correspondence with Receiver re preparing new report and what needs to be included;	<u>Hours</u>	<u>Amount</u>
05-Jul-2023	RTT	Review correspondence from Receiver re second auction of assets; Review and respond to correspondence from counsel for lender; Strategy call with Receiver.	0.50	200.00
06-Jul-2023	RTT	Draft email to lender counsel re issues with an expanded receivership order; Review response from lender's counsel; Call with Receiver.	0.50	200.00
09-Jul-2023	RTT	Review correspondence and proposed form of order from counsel for Radient; Email Receiver; Send follow up email to Receiver; Draft letters to service list and commercial coordinator; Revise application; Prepare second sale and vesting order; Draft booking letter.	2.10	840.00
10-Jul-2023	RTT	Call with Receiver re contents of application and report; Dictate changes to booking letter on Radient and letters to service list and make changes to application and order.	0.40	160.00
11-Jul-2023	RTT	Review correspondence from lender counsel; Review application materials; Review correspondence from lender to debtor counsel.	0.40	160.00
12-Jul-2023	RTT	Submit Notice to Media of request for a sealing order; Edit Application materials; Correspondence with Receiver; Email counsel for lender re error in date in Application; Review Workingman Capital's proposed auction agreement; Draft amending agreement to auction agreement; Review and edit Receiver's Report; Edit application materials; Correspondence with Receiver.	2.90	1,160.00
12-Jul-2023	LRR	Prepare amending agreement to auction services agreement and send to R. Trainer for review.	1.60	488.00
13-Jul-2023	RTT	Edit Application materials;	1.10	440.00

RE: RECEIVERSHIP OF RADIENT TECHNOLOGIES AND 1631807 **ALBERTA LTD** 

Invoice Date:

August 30, 2023

Invoice No.: Matter No.:

837839

20230959

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
<del>-</del>		Correspondence with Receiver; Email counsel for lender re error in date in Application; Review Workingman Capital's proposed auction agreement; Draft amending agreement to auction agreement; Review and edit Receiver's Report; Edit application materials; Correspondence with Receiver.		
14-Jul-2023	RTT	Review correspondence confirming structure of amending agreement with auctioneer; Review correspondence from lender on sold assets; Call with Receiver.	0.40	160.00
17-Jul-2023	RTT	Call with lender's counsel re strategy for adding in additional assets not currently proposed to be added to the expanded scope of order; Call with Receiver re access to safe and security issues with Canada Health and expanded scope of Order; Review correspondence.	0.80	320.00
18-Jul-2023	RTT	Correspondence with lender and receiver re proposed new language for amending order; Review proposed amendments to order; Prepare speaking notes for application; Approve form of Affidavit of Service.	1.30	520.00
19-Jul-2023	LRR	Emails with R. Trainer re revision to auction amending agreement; Review revised amending order re same.	0.20	61.00
19-Jul-2023	RTT	Finalize speaking notes for application; Call with Receiver; Attend at application to seek a Sale and Vesting Order and related relief; Debrief with Receiver.	1.40	560.00
20-Jul-2023	LRR	Revise auction services amending agreement to address potential additional of further property to saleable assets; Emails with R. Trainer re same.	0.50	152.50
20-Jul-2023	RTT	Review correspondence re third party equipment on site; Review proposed edits to auction agreement;	0.20	80.00
21-Jul-2023	RTT	Review updated amendment to Auction Agreement; Review correspondence from lender counsel.	0.50	200.00
21-Jul-2023	LRR	Make further change to auction services amending agreement, prepare new blackline and send to R. Trainer.	0.40	122.00
23-Jul-2023	RTT	Review and respond to correspondence from counsel for AFSC.	0.10	40.00

Invoice Date: Invoice No.: August 30, 2023 837839

Matter No.: 20230959

<u>Date</u>	Name	<b>Description</b>		<u>Hours</u>	<u>Amount</u>
24-Jul-2023 F	RTT	Review Special Contracting	g Lease.	0.10	40.00
26-Jul-2023 L	.RR	Compile execution copy of Services Amending Agreer schedules and send to K. ( email from R. Trainer re re changes to property managagreement.	ment with Gray; Read view of	0.30	91.50
26-Jul-2023 F	RTT	Review correspondence; Ragreement and provide con Receiver; Call with counse	mments to	1.20	480.00
28-Jul-2023 F	RTT	Review correspondence fro auction results.	om Receiver re	0.20	80.00
28-Jul-2023 L	.RR	Save executed auction ser amending agreement to file		0.10	30.50
03-Aug-2023 F	RTT	Call with Receiver re adding in additional assets and proper form of notice to be given to creditors.		0.10	40.00
04-Aug-2023 F	RTT	Review and respond to email from Receiver re marketing of supplemental assets.		0.20	80.00
15-Aug-2023 RTT Call with Receiver; Review and edi Receiver's report.		and edit	0.50	200.00	
Total				27.20	\$10,241.00
Timekeeper Sui	mmary				
<u>Name</u>		Timekeeper Title	Rate	<u>Hours</u>	Amount
RTT / RYAN TRAINER		Partner	400.00	22.80	9,120.00
LRR / LYDIA ROSEMAN		Associate	305.00	3.10	945.50
NER / NANCY F	RYAN	Paralegal	135.00	1.30	175.50
Total				27.20	\$10,241.00

#### **Cost Detail (Taxable)**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
22-Jun-2023	ACS Express Courier	20.00
21-Jul-2023	CWB Credit Card - Edm - Gord-Court of KB Printing Fees	9.00
	Agent's Filing Fee	5.00
	Colour Reprographic Services	11.60
	Corporate Registry - Search	7.00
	Laser printing	25.00
	PPR - Search	6.00
	Postage	1.94

MNP LTD. Invoice Date: August 30, 2023

RE: RECEIVERSHIP OF RADIENT TECHNOLOGIES AND 1631807 Invoice No.: 837839 ALBERTA LTD Matter No.: 20230959

**Date** Description **Amount** 

> Supplies - Tabs 9.42

Total \$94.96

**Cost Detail (Non-Taxable)** 

Date **Description** Amount 13-Jul-2023 Court House - Filing 70.00

\$70.00 Total

**Cost Summary (Taxable)** 

**Date Description Amount** 22-Jun-2023 **ACS Express Courier** 20.00 21-Jul-2023 CWB Credit Card - Edm - Gord-Court of KB Printing Fees 9.00 Agent's Filing Fee 5.00 Colour Reprographic Services 11.60 Corporate Registry - Search 7.00 Laser printing 25.00 PPR - Search 6.00 Postage 1.94 Supplies - Tabs 9.42 **Total** 

**Cost Summary (Non-Taxable)** 

**Date Description Amount** 13-Jul-2023 Court House - Filing 70.00 Total \$70.00

\$94.96

**Total Amount Due** \$10,922.76

THIS IS OUR ACCOUNT HEREIN McLENNAN ROSS LLP

PER: Ryan Trainer

**RYAN TRAINER** 

E. & E. O.

LEGAL COUNSEL

MNPITD 10235 101 STREET NW **SUITE 1300** EDMONTON, AV T5J 3G1 KRISTIN GRAY

Invoice Date: August 30, 2023 Invoice No.: 837839

Client No.: 020993 Matter No : 20230959 RTT

ATTENTION: GRAY, KRISTIN

#### REMITTANCE PAGE

Total Amount Due \$10,922.76

EFT (Electronic Funds Transfer) or Wire Transfer instructions

Please email "Matter: 20230959; Invoice: 837839 to payments@mross.com

Canadian Funds from within Canada

Receiving Bank: Canadian Western Bank,

100, 12230 Jasper Avenue Edmonton, AB T5N 3K3

Receiving Account: 101010437955

Bank ID: Bank Transit: 030 03029

Beneficiary Name: McLennan Ross LLP

Beneficiary Address: 600 McLennan Ross Building

12220 Stony Plain Road Edmonton, AB T5N 3Y4

Payments from outside of Canada

Receiving Bank:

Royal Bank of Canada 16909 - 103A Avenue

Edmonton, AB Canada T5P 4Y5

Receiving Account: 104-397-5 003

Bank ID:

Bank Transit: 01599

Beneficiary Name: McLennan Ross LLP Swift Code:

ROYCCAT2

Beneficiary Address: 600 McLennan Ross Building 12220 Stony Plain Road Edmonton, AB T5N 3Y4

For Interac e-Money Transfers

Please provide the matter number: 20230959; Invoice: 837839 and password by email to payments@mross.com

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G.S.T. #R119415172

Edmonton

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

Calgary

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

Yellowknife

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