

# Cassels

October 12, 2022

**Via E-Mail & Courier**

**Attention: See Enclosed Service List**

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file # 49076-20

Dear Sirs and/or Mesdames:

**Re: Court File No. 2201-09319  
Arnaki Ltd. v Solvaqua Inc.  
Application Scheduled for Thursday, October 20, 2022 at 11:00 AM (the “Application”)**

We are counsel to MNP Ltd. (“**MNP**”), in its capacity as court-appointed receiver and manager of the assets, undertakings and property of the defendant, Solvaqua Inc. (in such capacity, the “**Receiver**”). Further to the above-referenced matter, please find enclosed for service upon you copies of the following materials, which have been submitted for filing:

1. Application by MNP Ltd., returnable October 20, 2022, which attaches to it as Schedule “A” an Order Approving Sale & Investor Solicitation Process and Stalking Horse Bid; and
2. First Report of the Receiver dated October 11, 2022.

Proofs of filing of the same will be provided in due course.

We trust that you will find the foregoing to be in order, but please do not hesitate to contact the undersigned should you require anything further.

Yours truly,

Cassels Brock & Blackwell LLP

Danielle Marechal  
Partner  
DM/rk

LEGAL\*57200580.2

COURT FILE NUMBER      2201-09319

COURT                              COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE              CALGARY

PLAINTIFF                        ARNAKI LTD.

DEFENDANT                      SOLVAQUA INC.

DOCUMENT                      **SERVICE LIST**  
 (Updated: October 11, 2022)

Counsel/Party	Method of Service	Interest
<p><b>Chitiz Pathak LLP</b>            700, 77 King St West            TD North Tower            PO Box 118            Toronto, ON M5K 1G8</p> <p>Attn: Elliot Birnboim / Michael Crampton</p> <p>Email: <a href="mailto:ebirnboim@cpllp.com">ebirnboim@cpllp.com</a>  <a href="mailto:mcrampton@cpllp.com">mcrampton@cpllp.com</a></p>	Email	Counsel to Arnaki Ltd. and 2464525 Alberta Ltd., in its capacity as Stalking Horse Purchaser
<p><b>Cassels Brock &amp; Blackwell LLP</b>            Suite 3810, 888 3 St SW            Calgary, AB T2P 5C5</p> <p>Attn: Jeffrey Oliver / Kara Davis</p> <p>Email: <a href="mailto:JOliver@cassels.com">JOliver@cassels.com</a>  <a href="mailto:kdavis@cassels.com">kdavis@cassels.com</a></p>	Email	Counsel to MNP Ltd.
<p><b>SolvAQUA Inc.</b>            5<sup>th</sup> Floor, 335 8 Ave SW            Calgary, AB T2P 1C9</p> <p>Attn: Chris Tesarski</p> <p>Email: <a href="mailto:ctesarski@solvaqua.com">ctesarski@solvaqua.com</a></p>	Email	Defendant
<p><b>MNP Ltd.</b>            1500, 640 5th Ave SW            Calgary, AB T2P 3G4</p> <p>Attn: <b>Vanessa Allen</b></p> <p>Email: <a href="mailto:vanessa.allen@mp.ca">vanessa.allen@mp.ca</a></p>	Email	Receiver
<p><b>Field Law</b>            400, 444 7th Ave SW</p>	Email	Counsel to Export Development Canada

<p>Calgary, AB T2P 0X8</p> <p>Attn: Doug Nishimura</p> <p>Email: <a href="mailto:dnishimura@fieldlaw.com">dnishimura@fieldlaw.com</a></p>		
<p><b>Export Development Canada</b> 150 Slater Street Ottawa, ON K1A 1K3</p> <p>Email: <a href="mailto:dbarona@edc.ca">dbarona@edc.ca</a></p>		PPR Registrant
<p><b>Whitelaw Twining LLP</b> 810 150 9th Ave SW Calgary, AB T2P3H9</p> <p>Attn: Mathew James / Megan Vere</p> <p>Email: <a href="mailto:mjames@wt.ca">mjames@wt.ca</a> <a href="mailto:mvere@wt.ca">mvere@wt.ca</a></p>	Email	Counsel to Mr. Allan Mahoney, a party to litigation with SolvAqua Inc.
<p><b>Rotating Right (2016) Inc.</b> 101, 3903 75 Ave Leduc, AB T9E 0K3</p> <p>Attn: Len Kerekanich</p> <p>Email: <a href="mailto:len.kerekanich@rotatingright.com">len.kerekanich@rotatingright.com</a></p>	Email	Potential Creditor of SolvAQUA Inc.
<p><b>McCuaig Desrochers LLP</b> 1801, 10088 – 102 Avenue Edmonton, AB T5J2Z1</p> <p>Attn: Justin E. Kingston / Mary-Ellen Wynnyk</p> <p>Email: <a href="mailto:jkingston@mccuaig.com">jkingston@mccuaig.com</a> <a href="mailto:mwynnyk@mccuaig.com">mwynnyk@mccuaig.com</a></p>	Email	Agent for Service of Rotating Right
<p><b>Sean Campbell</b></p> <p>Email: <a href="mailto:seanrobbie@gmail.com">seanrobbie@gmail.com</a></p>	Email	Potential Creditor of SolvAQUA Inc.
<p><b>Canada Revenue Agency</b> 220 4 Ave SE Calgary, AB T2G 0L1</p>	Courier	Potential creditor of SolvAQUA Inc.
<p><b>Canada Revenue Agency</b> c/o Surrey National Verification and Collection Centre 9755 King George Blvd Surrey, BC V3T 5E1</p> <p>Fax: 1 833 697 2389</p>	Fax	Potential creditor of SolvAQUA Inc.

<b>Department of Justice Canada</b> Prairie Regional Office — Edmonton 300 Epcor Tower 10423 101 St NW Edmonton, AB T5H 0E7	Courier	Potential counsel to Canada Revenue Agency
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