



**DLA Piper (Canada) LLP**  
Suite 1000, Livingston Place West  
250 2nd St SW  
Calgary AB T2P 0C1  
www.dlapiper.com

Carole Hunter  
carole.hunter@dlapiper.com  
T 403.698.8782  
F 403.697.6600

February 1, 2023

FILE NUMBER: 016155-00036

**DELIVERED BY E-MAIL**

**TO THE ATTACHED SERVICE LIST:**

**Re: In the Matter of the Receivership of Seama Shalchi-Moghaddam Professional Corporation, Court File No. 2201-09578**

---

We are counsel for MNP Ltd., in its capacity as receiver and manager (the “**Receiver**”) of Seama Shalchi-Moghaddam Professional Corporation (the “**Debtor**”).

Enclosed herewith please find the following materials in respect of an application scheduled to be heard on February 9, 2023 at 10:00 a.m. before the Honourable Justice K. M. Horner:

1. Application of the Receiver, unfiled; and
2. The Second Report of the Receiver dated February 1, 2023, unfiled.

The application will seek, among other things, the approval of a sale transaction in respect of the assets, property and undertaking of the Debtor and the discharge of MNP Ltd., as Receiver of the Debtor. The application materials have been submitted for filing and we will provide copies of the filed materials as soon as we are in receipt of same.

Please do not hesitate to contact me if you have any questions or concerns..

Sincerely,  
**DLA Piper (Canada) LLP**  
Per:

A handwritten signature in blue ink, appearing to read 'Carole Hunter', written over a white background.

Carole Hunter  
CJH:  
:encl.

**SERVICE LIST**  
(as at February 1, 2023)

<b>PARTIES</b>	<b>COUNSEL FOR</b>
<p><b>DLA Piper (Canada) LLP</b> 1000, 250 - 2<sup>nd</sup> Street SW Calgary, AB T2P 0C1</p> <p>Attention: Carole Hunter Email: <a href="mailto:carole.hunter@ca.dlapiper.com">carole.hunter@ca.dlapiper.com</a></p>	<p>MNP Ltd., Receiver and Manager</p>
<p><b>Dentons Canada LLP</b> Bankers Court #1500, 850 – 2nd Street SW Calgary, AB T2P 0R8</p> <p>Attention: Afshan Naveed and Pavin Takhar Email: <a href="mailto:afshan.naveed@dentons.com">afshan.naveed@dentons.com</a> <a href="mailto:pavin.takhar@dentons.com">pavin.takhar@dentons.com</a></p>	<p>Royal Bank of Canada, Plaintiff</p>
<p><b>Miles Davison LLP</b> 900, 517 – 10th Ave SW Calgary, AB T2R 0A8</p> <p>Attention: Terry Czechowskyj Email: <a href="mailto:tczech@milesdavison.com">tczech@milesdavison.com</a></p>	<p>Seama Shalchi- Moghaddam Professional Corporation and Seama Shalchi-Moghaddam, Defendants</p>
<p><b>MNP Ltd.</b> 1500, 640 - 5<sup>th</sup> Ave SW Calgary, AB T2P 3G4</p> <p>Attention: Vanessa Allen Email: <a href="mailto:vanessa.allen@mnp.ca">vanessa.allen@mnp.ca</a></p>	<p>Receiver and Manager</p>
<p><b>College of Dental Surgeons of Alberta</b> Suite 402, 7609 – 109 Street Edmonton, AB T6G 1C3</p> <p>Attention: Denise Thompson, Chief Legal Officer Email: <a href="mailto:dthompson@cdsab.ca">dthompson@cdsab.ca</a></p> <p>Attention: Dr. Randall Croutze, Chief Executive Officer Email: <a href="mailto:rcroutze@cdsab.ca">rcroutze@cdsab.ca</a></p>	

PARTIES	COUNSEL FOR
<p><b>Canada Revenue Agency</b>  Justice Canada  Prairie Region  606 - 4 Street S.W., Suite 510  Calgary, Alberta T2P 1T1</p> <p>Attention: Jill Medhurst  Email: <a href="mailto:jill.medhurst@justice.gc.ca">jill.medhurst@justice.gc.ca</a></p>	
<p><b>Office of the Superintendent in Bankruptcy</b>  Standard Life Tower  639 Fifth Avenue SW, Suite 400  Calgary, Alberta T2P 0M9</p> <p>Attention: Mark Skiba  Email: <a href="mailto:mark.skiba@ised-isde.gc.ca">mark.skiba@ised-isde.gc.ca</a></p>	