



Bren R. Cargill

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In Reply Please Refer to File No.: 131780.2/BRC

May 1, 2023

The Honourable Justice M. J. Lema
c/o Commercial Coordinator
Alberta Court of King's Bench
Edmonton Law Courts Building
1A Sir Winston Churchill Square
Edmonton, AB T5J 0R2

***DELIVERED VIA COURIER
& EMAIL: CommercialCoordinator.QBEdmonton@albertacourts.ca***

Attention: The Honourable Justice M. J. Lema

My Lord:

***Re: Endale Gutama in his capacity as Litigation Representative of Melesse Dahessa Gutama (deceased)
v Vital Property Services Inc., Tidy Holdings Corporation, Hussein Choufi also known as Huss
Choufi and Basima Choufi
Court of King's Bench Action No. 2303 00601 (the "Action")
Application to be heard on May 12, 2023 at 10:00 a.m.***

We are the solicitors for MNP Ltd., court appointed Interim Receiver and Manager over Vital Property Services Inc. and Tidy Holdings Corporation (the "Interim Receiver"). Further to the application scheduled by the Plaintiff in the Action to be heard on May 12, 2023, via Webex before Your Lordship for the appointment of MNP Ltd. as Receiver or Liquidator, the Interim Receiver will be making its own application for an Order approving of its activities to date as outlined in its First Report to the Court. Further to the scheduled appearance before Your Lordship, we enclosed for your consideration the following:

1. Notice of Application;
2. First Report of the Receiver – dated April 28, 2023; and
3. Proposed Form of Order.

Please note that we have provided electronic copies of the enclosed materials to the Commercial Court Coordinator. All of the above reference materials have been filed/have been submitted to the Court for filing.

If Your Lordship has any questions or concerns on this matter, please do not hesitate to contact the writer.

Yours truly,

WITTEN LLP

Per:


BREN R. CARGILL

BRC/

cc. Service List (enclosed herein as Schedule "A")

cc. Client – via email

SCHEDULE "A"

**Endale Gutama in his capacity as Litigation Representative of Melesse Dahessa Gutama (deceased)
v Vital Property Services Inc., Tidy Holdings Corporation, Hussein Choufi also know as Huss
Choufi and Basima Choufi**

Service List

<p>Cooper Regel LLP 77 Chippewa Road Sherwood Park, Alberta T8A 6J7 Attn: Andrew S. Rice Via email: andrew@cooperRegel.ca (Counsel for Hussein Choufi and Basima Choufi)</p>	<p>MNP LTD. 1300, 10235 101St N.W. Edmonton, AB T5J 3G1 Attn: Kristin Gray, CPA, CA, CIRP, LIT Via email: Kristin.Gray@mnp.ca (Proposed Receiver/Liquidator and Interim Receiver)</p>
<p>Witten LLP 2500, 10303 Jasper Avenue NW Edmonton, Alberta T5J 3N6 Attn: Bren Cargill Via Email: bcargill@wittenlaw.com (Counsel for Proposed Receiver/Liquidator and Interim Receiver)</p>	<p>Vital Property Services Inc. c/o Agent for Service Peter Cave 131 Ozerna Road Edmonton, Alberta, T5Z 2Z4 Via Process Server & Email: pharnsworth@telus.net</p>
<p>Tidy Holdings Corporation c/o Agent for Service Hussein Choufi 15508 74 Street NW Edmonton, Alberta T5Z 2Y1 Via Process Server & Email: huss@vitalprops.com</p>	<p>Department of Justice, Canada (Courtesy Copy) Via email: George.Body@justice.gc.ca</p>
<p>Office of the Superintendent of Bankruptcy 725, 9700 Jasper Avenue NW Edmonton, Alberta T5J 4C3 Via Courier</p>	<p>Canada Revenue Agency 9700 Jasper Avenue Edmonton, Alberta, T2P 4K9 Via Courier</p>
<p>The Bank of Nova Scotia 10 Wright Boulevard Stratford, On N5A 7X9 (Security Agreement 18091809288) Via Courier</p>	<p>Canada Revenue Agency – Surrey National Verification and Collections Centre 9755 King George Boulevard Surrey, BC, V3T 5E1 Via Fax: 866.219.0311</p>
<p>Royal Bank of Canada 10 York Mills Road Toronto, Ontario M2P 0A2 (Security Agreement 16090939832) Via Courier</p>	<p>Tricor Lease & Finance Corp. PO Box 397 Burlington, On L7R 3Y3 (Security Agreement 16092002799) Via Courier</p>
<p>Seada Hasen 15911-95 Street Edmonton, AB T5Z 0E9</p>	<p>Insight Law LLP 605, 10080 Jasper Avenue NW Edmonton, AB T5J 1V9</p>

(Courtesy Copy) Via Courier	Attn: Carolyn Grogan (Courtesy Copy) Via email: info@insightlaw.ca
DXC Insurance Services, Canada Via email: Gregory.robinson@dxc.com (Claims adjustors for Ivori, Courtesy Copy)	