

July 14, 2020

File No.: 574391-1

**Service List attached as Schedule "A"**

To Whom it May Concern:

**RE: Innovation Credit Union et al. v 1885731 Alberta Ltd., et al  
Court of Queen's Bench of Alberta Action No.: 1801-08521**

We are counsel to Innovation Credit Union and Concentra Bank (the "**Plaintiffs**") in the above-captioned matters, and are writing regarding an application to appoint a receiver and manager scheduled to be heard by The Honourable Madam Justice Campbell via Webex on July 22, 2020 at 2:00 p.m.

In respect of this application, please find enclosed for service upon you:

1. Application; and
2. Affidavit of Brad Appel No. 1 sworn July 9, 2020.

Please note that due to size, only the body text of the Affidavit of Brad Appel is being provided to those parties receiving service by fax or mail. Should any of these parties wish to receive copies of any of the exhibits, please contact the undersigned. Proof of filing will be circulated once obtained.

As the application will be heard by Webex, the undersigned kindly requests that any parties who intend on participating in the application advise the undersigned in advance so that the Court can be notified of the expected participants. Should any parties who have not provided an email address for service wish to participate, please contact the undersigned so that he may coordinate their participation with the Court.

Yours truly,  
**Dentons Canada LLP**



John Regush

JAKR/

Enclosures

Schedule "A"

**SERVICE LIST**

Innovation Credit Union and Concentra Bank v 1885731 Alberta Ltd., Ostrander Family Holdings Ltd., Philip Krahn, and Brian Ostrander

<b><u>Party</u></b>	<b><u>Role</u></b>
<p><b>Dentons Canada LLP</b></p> <p>1500, 850-2<sup>nd</sup> Street SW Calgary, Alberta T2P 0R8</p> <p>Attention: John Regush</p> <p>Email: john.regush@dentons.com</p>	<p><i>Counsel to Innovation Credit Union and Concentra Bank</i></p>
<p><b>Burnet Duckworth and Palmer LLP</b></p> <p>2400, 525 – 8<sup>th</sup> Avenue SW Calgary, Alberta T2P 1G1</p> <p>Attention: James Murphy</p> <p>Email: jdm@bdplaw.com</p>	<p><i>Counsel to the Defendants, 1885731 Alberta Ltd., Ostrander Family Holdings Ltd., Philip Krahn, and Brian Ostrander</i></p>
<p><b>Deloitte Restructuring Inc.</b></p> <p>700, 850 – 2<sup>nd</sup> Street SW Calgary, Alberta T2P 0R8</p> <p>Attention: Bob Taylor / Naomi McGregor</p> <p>Email: bobtaylor@deloitte.ca, naomcmgregor@deloitte.ca</p>	<p><i>Proposed Receiver of 1885731 Alberta Ltd.</i></p>
<p><b>856223 Alberta Ltd.</b></p> <p>1326 – 119B Street Edmonton, Alberta T6J 7H5</p>	<p><i>PPR Registrant/Land Titles Registrant</i></p>
<p><b>Blue Chip Leasing Corporation</b></p> <p>156 Duncan Mill RD, Unit 16 Toronto, ON M3B 3N2</p>	<p><i>PPR Registrant</i></p>
<p><b>Her Majesty the Queen in Right of Alberta</b></p> <p>6th Fl West Haultain Bldg 9811 109 St Edmonton, AB T5K 2L5 Email: tbf-r-ops-paralegal@gov.ab.ca</p>	<p><i>PPR Registrant/Land Titles Registrant</i></p>

<b>Daystar Mechanical Plumbing and Heating Inc.</b>  Unit 11, 25 East Lake Circle NE Airdrie, Alberta T4A 2J9	<i>Land Titles Registrant (Builder's Lien)</i>
Email List john.regush@dentons.com; jdm@bdplaw.com; bobtaylor@deloitte.ca; naomcgregor@deloitte.ca; tbf-r-ops-paralegal@gov.ab.ca	