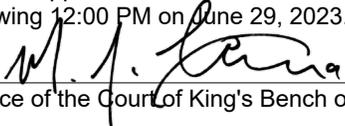


Fiat:
Let this Application be filed notwithstanding its submission following 12:00 PM on June 29, 2023.

Justice of the Court of King's Bench of Alberta



COURT FILE NUMBER August 28, 2023 2301-04941

COURT

COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE



CALGARY

PLAINTIFF

BANK OF MONTREAL

DEFENDANTS

WESTMOUNT PROJECTS INC., 2218923 ALBERTA LTD., 1975847 ALBERTA LTD., ANDERSON & ASSOCIATES FINANCIAL CORP., IRONCLAD PROJECTS LTD., GORDAN D. ANDERSON, AND DENI MARIO DANIEL ECHINO

DOCUMENT

APPLICATION

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

Dentons Canada LLP
Bankers Court
15th Floor, 850 - 2nd Street S.W.
Calgary, Alberta T2P 0R8



Attention: Derek Pontin
Ph. (403) 268-6301
Fx. (403) 268-3100
File No.: 569588-14

\$50.00
JS
July 5, 2023
Justice Lema

NOTICE TO RESPONDENTS: Service List attached as Schedule "A"

This application is made against you. You are a respondent.

You have the right to state your side of this matter before the Judge.

To do so, you must be in Court when the application is heard as shown below:

Date: July 5, 2023
Time: 8:45 a.m.
Where: Edmonton Law Courts
Via Web-Ex

Before Whom: The Honourable Justice Lema

Go to the end of this document to see what you can do and when you must do it.

REMEDY CLAIMED OR SOUGHT:

1. Deloitte Restructuring Inc. ("**Deloitte**"), in its capacity as Court-appointed receiver and manager (the "**Receiver**") pursuant to Orders granted in these proceedings on May 15, 2023 (the "**Receivership Orders**") respectfully seeks:
 - (a) an Order, substantially in the form attached as Schedule "B" hereto (the "**Compliance Order**"):
 - (i) declaring that the time for service of this Application be abridged, that this Application is properly returnable, and that further service of the Application be dispensed with;
 - (ii) approving the Receiver's activities as set out in the Receiver's First Reports and the Statements of Receipts and Disbursements as attached to the Receiver's First Reports; and
 - (iii) directing that each of Westmount Projects Inc. ("**Westmount**"), 2218923 Alberta Ltd. ("**221 Alberta**"), and 1975847 Alberta Ltd. ("**197 Alberta**", and collectively with Westmount and 221 Alberta, the "**Debtors**") comply with their duties pursuant to the Receivership Order and cooperate with the Receiver and deliver to the Receiver books and records of the companies and property subject to the Receivership Orders and directing that Abdul Sattar, director of the Debtors, and Farhan Sattar, representative of the Debtors, cause the Debtors to comply with these duties and obligations; and
 - (b) such further and other relief as this Honourable Court deems just and appropriate.

GROUND FOR MAKING THIS APPLICATION:

2. On April 27, 2023, Deloitte was appointed by an Order (the "**Interim Receiver of Rents Order**") of the Court of King's Bench of Alberta (the "**Court**") as the Interim Receiver of Rents (the "**Rent Receiver**"), without security, to collect rents for five (5) specific properties (the "**Properties**") owned by the Debtors.
3. The Interim Receiver of Rents Order was granted as a result of an application by Bank of Montreal ("**BMO**"), which has registered security interests in respect of the Properties. The relief sought in the application, except for the relief granted in respect of the Interim Receiver of Rents Order, was adjourned and the adjourned portions of the application were heard on May 10, 2023 and May 15, 2023.
4. On May 15, 2023 Deloitte was appointed by Orders of the Court (collectively, the "**Receivership Orders**") as receiver and manager of all of the assets, properties, and undertaking of 221 Alberta

and 197 Alberta, and in respect of Westmount over the Mortgaged Property and Serial Number Property, as defined in the Receivership Order pertaining to Westmount.

5. The Mortgaged Property is comprised of three multi-family homes in the Calgary area.
6. 221 Alberta and 197 Alberta each own a commercial property in the Medicine Hat area (which, are referred to respectively as the “**221 Property**” and “**197 Property**”, and collectively with the Mortgaged Property, is referred to as the “**Real Property**”).
7. There are currently tenants in the Real Property.

Approval of Receiver’s Activities

8. The Receiver’s activities to date include, among other things as more expressly detailed in the First Reports filed in these proceedings:
 - (a) instructing the Receiver’s legal counsel, Dentons Canada LLP (“**Dentons**”), to make inquiries of the Debtors via their counsel in respect of various outstanding information requests of the Rent Receiver and the Receiver, via letters dated May 16, 2023 and June 7, 2023;
 - (b) corresponding, including a meeting at the Receiver’s office on May 23, 2023, with Kate Steele, a known representative of management of the Debtors, regarding various matters including, but not limited to, security deposits, collection of rents, tenant information, property maintenance and the outstanding books and records;
 - (c) attending the Real Property to take possession, secure the Real Property, and meet with tenants;
 - (d) issuing notice of the receivership to all tenants, providing contact information and banking instructions for future rents until further notice;
 - (e) collecting tenant rents;
 - (f) arranging to maintain the existing insurance coverage over the property and adding the Receiver as a loss payee on the existing insurance policies;
 - (g) arranging for continued service from critical utilities and property maintenance vendors;
 - (h) arranging for mail redirection;
 - (i) issuing a statutory Notice and Statement of the Receiver to all known creditors of 197 and 221 pursuant to subsections 245(1) and 246(1) of the *Bankruptcy and Insolvency Act* (Canada);
 - (j) demanding delivery of security deposits and pre-paid rents from management of the Debtors;

- (k) requesting books and records from Sam and Associates, an accounting firm engaged by the Debtors;
 - (l) requesting books and records from Sihota Taylor, an accounting firm the Receiver believes to have been engaged by the Debtors;
 - (m) requesting bank statements from all known financial institutions that 197 Alberta and 221 Alberta have dealings with, including, BMO, Servus Credit Union, and Canadian Western Bank;
 - (n) informing the Canada Revenue Agency ("CRA") of the receivership and requesting new tax accounts be established for the post-receivership period for 197 Alberta and 221 Alberta;
 - (o) opening new trust accounts in the name of the receivership estate to facilitate future receipts and disbursements;
 - (p) preparing and updating from time to time an operating receivership cash flow;
 - (q) corresponding with Dentons on various legal matters relating to these receivership proceedings;
 - (r) corresponding with creditors, tenants, and other stakeholders;
 - (s) preparing, reviewing and finalizing the First Reports; and
 - (t) addressing additional matters of both a general and specific nature as they arose from time to time.
9. The Receiver seeks ratification and approval of its actions as described in the First Reports filed in these proceedings.

Order Compelling Compliance

10. The Receivership Orders require that the Debtors deliver to the Receiver the Property and books and records related to the Debtors and the Property.
11. Despite repeated requests from the Receiver, both directly and through its counsel, the Debtors have each failed to perform these obligations, and more particularly:
- (a) Westmount has failed to deliver to the Receiver:
 - (i) the Serial Number Property;
 - (ii) the amounts in respect of security deposits for the Mortgaged Property;
 - (iii) books, records, and information requested by the Receiver;

- (b) 221 Alberta has failed to deliver to the Receiver:
 - (i) amounts in respect of security deposits; and
 - (ii) books, records, and information requested by the Receiver; and
- (c) 197 Alberta has failed to deliver to the Receiver:
 - (i) amounts in respect of prepaid rents and security deposits; and
 - (ii) books, records, and information requested by the Receiver.
- 12. The Receiver has not been able to complete a full review of the prepaid rent, deposits, and other amounts that may be owing due to the non-compliance of the Debtors in providing requested books and records; however, the Receiver has been able to ascertain certain amounts owing in respect of rent, deposits, and other related amounts, and is seeking payment thereof, as such amounts constitute property of the Debtors (and in the case of Westmount particularly are inherently related to the Mortgaged Property).
- 13. The Receivership Orders require that the Debtors comply with the Receiver's requests to deliver up the required property, books, records, and information.
- 14. There is no legitimate basis for the Debtors' persistent refusal to comply with the Receiver's demands.
- 15. The Receiver respectfully seeks an Order of this Honourable Court directing the Debtors to comply with these obligations.
- 16. Westmount should also be directed to deliver to the Receiver all mail correspondence received regarding the Mortgaged Property and Serial Number Property.
- 17. The Receiver further respectfully seeks an Order compelling Abdul Sattar, who is the listed director of the Debtors in their respective corporate searches, and Farhan Sattar, who has attested in affidavits filed in these proceedings that he is a representative of the Debtors, to direct and cause the Debtors to comply with these duties and obligations.
- 18. Such further and other grounds as counsel may advise and this Honourable Court may permit.

MATERIAL OR EVIDENCE TO BE RELIED ON:

- 19. The First Report of the Receiver in respect of Westmount, 221 Alberta, and 197 Alberta, each dated June 29, 2023, to be filed.
- 20. The pleadings and proceedings herein.

21. Such further and other material or evidence as counsel may advise and this Honourable Court may permit.

APPLICABLE RULES:

22. *Alberta Rules of Court*, Alta Reg 124/2010.
23. *Bankruptcy and Insolvency General Rules*, CRC, c 368.
24. Such further and other Rules as counsel may advise and this Honourable Court may permit.

APPLICABLE ACTS AND REGULATIONS:

25. *Bankruptcy and Insolvency Act*, RSC 1985 c B-3.
26. *Judicature Act*, RSA 2000 c J-2.
27. Such further and other Acts and Regulations as counsel may advise and this Honourable Court may permit.

HOW THE APPLICATION IS PROPOSED TO BE HEARD OR CONSIDERED:

28. Via Web-Ex, before the Honourable Justice Lema.

WARNING

If you do not come to Court either in person or by your lawyer, the Court may give the applicant what it wants in your absence. You will be bound by any order that the Court makes. If you want to take part in this application, you or your lawyer must attend in Court on the date and time shown at the beginning of the form. If you intend to rely on an affidavit or other evidence when the application is heard or considered, you must reply by giving reasonable notice of the material to the applicant.

Schedule "A" to the Application

COURT FILE NUMBER: 2301-04941
COURT COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY
PLAINTIFF BANK OF MONTREAL
DEFENDANTS WESTMOUNT PROJECTS INC., 2218923 ALBERTA LTD.,
1975847 ALBERTA LTD., ANDERSON & ASSOCIATES
FINANCIAL CORP., IRONCLAD PROJECTS LTD., GORDAN D.
ANDERSON, and DENI MARIO DANIEL ECHINO

DOCUMENT:

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS
DOCUMENT:

SERVICE LIST

Dentons Canada LLP
Bankers Court
15th Floor, 850 - 2nd Street S.W.
Calgary, Alberta T2P 0R8
Attn: Derek M. Pontin
Ph. (403) 268-6301 Fx. (403) 268-3100
File No.: 569588-14

Updated June 29, 2023

PARTY	COUNSEL
<p>Deloitte Restructuring Inc. 700-850 2 Street SW Calgary AB T2P 0R8</p> <p>Attention: Cassie Poon Email: caspoon@deloitte.ca</p> <p>Attention: Naomi McGregor Email: naomcgregor@deloitte.ca</p>	<p><i>Counsel for Deloitte Restructuring Inc.</i></p> <p>Dentons Canada LLP 15th Floor, 850 2 Street SW Calgary, Alberta T2P 0R8</p> <p>Derek Pontin Email: derek.pontin@dentons.com</p> <p>John Regush Email: john.regush@dentons.com</p>
<p>Bank of Montreal 525 – 8th Avenue SW, 9th Floor Calgary, Alberta T2P 1G1</p> <p>Attention: Trevor Bauer Email: Trevor.Bauer@bmo.com</p>	<p><i>Counsel to Bank of Montreal</i></p> <p>MLT Aikins LLP 2100 Livingstone Place 222 - 3rd Avenue SW Calgary, Alberta T2P 0B4</p> <p>Ryan Zahara Email: rzahara@mltaikins.com</p>
<p>Canada Revenue Agency 220 4th Avenue SE Calgary, Alberta T2G 0L1</p>	<p><i>Counsel to Canada Revenue Agency</i></p> <p>Department of Justice Canada Prairie Regional Office – Edmonton #300, 10423 – 101 St. NW Edmonton, Alberta T5H 0E7</p> <p>Bertrand Malo Email: bertrand.malo@justice.gc.ca</p> <p>Breanne Byrne Email: breanne.byrne@justice.gc.ca</p>
<p>Westmount Projects Inc. c/o Registered Office 511-888 4 Ave S.W. Calgary, Alberta T2P 0V2</p>	<p><i>Counsel to Westmount Projects Inc.</i></p> <p>Llewellyn Law 2440 Kensington Road NW Calgary, Alberta T2N 3S1</p> <p>Clive Llewellyn Email: cllewellyn@llewellynlaw.net</p>

<p>2218923 Alberta Ltd. c/o Registered Office 511-888 4 Ave S.W. Calgary, Alberta T2P 0V2</p> <p>Kate Steele Email: kate@yyclegal.com</p>	<p><i>Counsel to 2218923 Alberta Ltd.</i></p> <p>Llewellyn Law 2440 Kensington Road NW Calgary, Alberta T2N 3S1</p> <p>Clive Llewellyn Email: cllewellyn@llewellynlaw.net</p>
<p>1975847 Alberta Ltd. c/o Registered Office 511-888 4 Ave S.W. Calgary, Alberta T2P 0V2</p> <p>Attention: Kate Steele Email: kate@yyclegal.com</p>	<p><i>Counsel to 1975847 Alberta Ltd.</i></p> <p>Llewellyn Law 2440 Kensington Road NW Calgary, Alberta T2N 3S1</p> <p>Clive Llewellyn Email: cllewellyn@llewellynlaw.net</p>
<p>Anderson & Associates Financial Corp. c/o Registered Office 511-888 4 Ave S.W. Calgary, Alberta T2P 0V2</p> <p>Anderson & Associates Financial Corp. 2440 Kensington Rd NW Calgary, Alberta T2N 3S1</p>	
<p>Ironclad Projects Ltd. c/o Registered Office 511-888 4 Ave S.W. Calgary, Alberta T2P 0V2</p> <p>Ironclad Projects Ltd. 404, 3412 Parkdale Blvd NW Calgary, Alberta T2N 3T4</p>	

<p>Gordan D. Anderson 404, 3412 Parkdale Blvd NW Calgary, Alberta T2N 3T4</p> <p>Email: gord@mylifefinancialgroup.com</p>	<p><i>Counsel to Gordan D. Anderson</i></p> <p>Wolff Leia Barristers and Solicitors 203, 221 10th Avenue SE Calgary, AB T2G 0V9</p> <p>Greg Leia Email: gleia@wolffleia.ca</p>
<p>Deni Mario Daniel Echino 1401, 837 – 2nd Avenue SW Calgary, Alberta T2P 0E6</p> <p>Email: dan@calroc.ca</p>	
<p>The City of Medicine Hat 580 - 1 Street SE Medicine Hat, Alberta T1A 8E6</p> <p>Email: collections@medicinehat.ca</p>	
<p>Coinamatic Pacific Ltd. 301 Matheson Blvd. West Mississauga, ON, L5R 3G3 Canada</p> <p>Attention: Monique Koppens Email: MKoppens@coinamatic.com</p>	
<p>Olympia Trust Company P.O. Box 2581, STN Central Calgary, Alberta T2P 1C8</p>	
<p>Horizon Capital Corporation 3200 Telus House, South Tower 10020 100 Street Edmonton, Alberta T5J 0N3</p>	<p><i>Counsel for Horizon Capital Corporation</i></p> <p>Barr LLP 10123 99 St NW #2500 Edmonton, AB T5J 3H1</p> <p>Brandon K. Hans Email: bhans@barrllp.com</p>

<p>Canadian Western Bank Credit Support, Nab Region 201, 12230 Jasper Avenue Edmonton, Alberta T5N 3K3</p>	<p><i>Counsel for Canadian Western Bank</i></p> <p>McLennan Ross LLP 600 McLennan Ross Building 12220 Stony Plain Road Edmonton, AB T5N 3Y4</p> <p>Ryan Trainer Email: ryan.trainer@mross.com</p>
<p>Concentra Bank c/o Comm Leasing, Box 3030 Regina, Saskatchewan S4P 3G8</p> <p>Email: commercialleasing-funding@concentra.ca</p>	
<p>ATB Financial 8008 104 Street Edmonton, AB T6E 4E2</p> <p>Email: pnrnotices@atb.com</p>	
<p>Summit Acceptance Corp 1260 Highfield Cres SE Calgary, AB T2G 5M3</p> <p>Email: abppsa_notifications@kaizenauto.com</p>	
<p>Canadian Mortgage Servicing Corporation 20 Adelaide Street East, Suite 900 Toronto, ON M5C 2T6</p> <p>Email: Rob.Goodall@cmcapitalcorp.com</p>	<p><i>Counsel to Canadian Mortgage Servicing Corporation</i></p> <p>BLG Centennial Place, East Tower 1900, 520 – 3rd Ave. SW, Calgary, AB T2P 0R3</p> <p>Jack Maslen Email: JMaslen@blg.com</p>
<p>Wells Fargo Equipment Finance Company 1100-1290 Central Parkway W. Mississauga, ON L5C 4R3</p> <p>Email: absecparties@avssystems.ca</p>	

<p>Daimler Truck Financial 2680 Matheson Blvd. E. Ste 500 Mississauga, ON L4W 0A5</p> <p>Email: albertaprod@teranet.ca</p>	
<p>Servus Credit Union Ltd. 151 Karl Clark Road NW Edmonton, AB T6N 1H5</p> <p>Email: rms@servus.ca</p>	
<p>Quadrum Mortgage Corp. 640, 340 – 12th Avenue S.W. Calgary, AB T2R 1L5</p> <p>Email: tatiana@quadrummortgage.com</p>	<p><i>Counsel to Quadrum Mortgage Corp.</i></p> <p>WBA Law LLP Barristers & Solicitors 1413 – 2nd Street S.W. Calgary, Alberta T2R 0W7</p> <p>Umberto Cappella Email: ucappella@wbalaw.ca</p> <p>David James Email: djames@wbalaw.ca</p> <p>Connie Luong Email: cluong@wbalaw.ca</p>
<p>AP Capital Mortgage Investment Corporation 1795 – 555 Burrard Street Calgary, AB T2P 3T9</p> <p>Email: eric@apcapital.ca</p>	
<p>Stride Capital Corp. Suite 201, 3007 14th Street SW Calgary, AB T2T 3V6</p> <p>Email: p psa@stridecap.com</p>	
<p>TSX Trust Company 300 – 100 Adelaide Street West Toronto, ON M5H 1S3</p> <p>Email: james.nguyen@tmx.com</p>	

<p>Barr LLP 10123 99 St NW #2500 Edmonton, AB T5J 3H1</p> <p>Attention: Asa Hagel Email: ahagel@barrllp.com</p>	
<p>Abdul Sattar 511, 888 – 4th Ave SW Calgary, AB T2P 0V2</p>	

EMAILS:

caspoon@deloitte.ca; naomcgregor@deloitte.ca; derek.pontin@dentons.com;
john.regush@dentons.com; Trevor.Bauer@bmo.com; rzahara@mltaikins.com;
bertrand.malo@justice.gc.ca; breanne.byrne@justice.gc.ca;
cllewellyn@llewellynlaw.net; kate@yyclegal.com; gord@mylifefinancialgroup.com;
gleia@wolffleia.ca; dan@calroc.ca; collections@medicinehat.ca; MKoppens@coinamatic.com;
bhans@barrllp.com; ryan.trainer@mross.com; commercialleasing-funding@concentra.ca;
prrnotices@atb.com; abppsa_notifications@kaizenauto.com;
Rob.Goodall@cmcapitalcorp.com; JMaslen@blg.com; absecparties@avssystems.ca;
albertaprod@teranet.ca; rms@servus.ca; ucappella@wbalaw.ca; djames@wbalaw.ca;
cluong@wbalaw.ca; tatiana@quadrummortgage.com; eric@apcapital.ca;
ppsa@stridecap.com; james.nguyen@tmx.com; ahagel@barrllp.com;

COURIER:

Anderson & Associates Financial Corp.

c/o Registered Office
511-888 4 Ave S.W.
Calgary, Alberta T2P 0V2

Anderson & Associates Financial Corp.

2440 Kensington Rd NW
Calgary, Alberta T2N3S1

Ironclad Projects Ltd.

c/o Registered Office
511-888 4 Ave S.W.
Calgary, Alberta T2P 0V2

Ironclad Projects Ltd.

404, 3412 Parkdale Blvd NW
Calgary, Alberta T2N 3T4

Olympia Trust Company

P.O. Box 2581, STN Central
Calgary, Alberta T2P1C8

Horizon Capital Corporation

3200 Telus House, South Tower
10020 100 Street
Edmonton, Alberta T5J0N3

Canadian Western Bank

Credit Support, Nab Region
201, 12230 Jasper Avenue
Edmonton, Alberta T5N 3K3

Abdul Sattar

511, 888 – 4th Ave SW
Calgary, AB T2P 0V2

Schedule "B" to the Application

Clerk's Stamp:

COURT FILE NUMBER	2301-04941
COURT	COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE	CALGARY
PLAINTIFF / DEFENDANT BY COUNTERCLAIM	BANK OF MONTREAL
DEFENDANT /PLAINTIFF BY COUNTERCLAIM	WESTMOUNT PROJECTS INC., 2218923 ALBERTA LTD., 1975847 ALBERTA LTD., ANDERSON & ASSOCIATES FINANCIAL CORP., IRONCLAD PROJECTS LTD., GORDAN D. ANDERSON, AND DENI MARIO DANIEL ECHINO
DOCUMENT	<u>ORDER</u>
ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	Dentons Canada LLP Bankers Court 15th Floor, 850 - 2nd Street S.W. Calgary, Alberta T2P 0R8 Attention: Derek Pontin Ph. (403) 268-6301 Fx. (403) 268-3100 File No.: 569588-14
DATE ON WHICH ORDER WAS PRONOUNCED:	July 5, 2023
LOCATION WHERE ORDER WAS PRONOUNCED:	Calgary, Alberta
NAME OF JUSTICE WHO MADE THIS ORDER:	The Honourable Justice Lema

UPON the application of Deloitte Restructuring Inc., in its capacity as Court-appointed receiver and manager ("**Receiver**") pursuant to three Orders of the Honourable Justice Lema pronounced on May 15, 2023 in these proceedings (the "**Receivership Orders**"); **AND UPON** reading the First Reports of the Receiver in respect of Westmount Projects Inc. ("**Westmount**"), 2218923 Alberta Ltd. ("**221 Alberta**"), and 1975847 Alberta Ltd. ("**197 Alberta**", and collectively with Westmount and 221 Alberta, the "**Debtors**") (collectively, the "**First Reports**"); **AND UPON** reading the Affidavit of Service of Terry Trojanoski sworn [], 2023, to be filed; **AND UPON** hearing counsel for the Receiver, and such other parties as made submissions on their own behalf or through counsel;

IT IS HEREBY ORDERED AND DECLARED THAT:

Service

1. The time for service of the notice of application for this order is hereby abridged and deemed good and sufficient and this application is properly returnable today.

Approval of Fees and Activities

2. The Receiver's accounts for fees and disbursements, as set out in the First Reports are hereby approved without the necessity of a formal passing of its accounts.
3. The accounts of the Receiver's legal counsel Dentons Canada LLP for their fees and disbursements, as set out in the First Reports are hereby approved without the necessity of a formal assessment of their accounts.
4. The Receiver's activities as set out in the First Reports and the Statement of Receipts and Disbursements as attached to the First Reports, are hereby ratified and approved.

Westmount

5. Within seven (7) days of service of this Order, Westmount is ordered to:
 - (a) deliver the following personal property to the yard located at 1100 114th Avenue SE Calgary, Alberta:
 - (i) 2021 Miller XTM 350 Welder wit Serial No. LG170613A;
 - (ii) 2021 Miller XTM 350 Welder wit Serial No. LF236463;
 - (iii) 2021 Miller XTM 350 Welder wit Serial No. LF1145A;
 - (iv) 2021 Miller XTM 350 Welder wit Serial No. LF304789;
 - (v) 2016 GMC Sierra VIN#3GTU2PEC2GG358326;
 - (vi) 2021 FROR Moel BL714TA2 Serial No. 5NHUBL422MB482082;
 - (vii) 2021 Cantra Model DT8314-14K VIN#2CPUSD2F7MA043011; and
 - (viii) 2021 Cantra Model DT8314-14K VIN#2CPUSD2F9MA043012; and
 - (b) pay to the Receiver funds in the amount of \$23,240.00, in respect of security deposits.
6. Within 10 days of service of this Order, Westmount is ordered to provide the Receiver with the information outlined in Annex "1" hereto or to confirm in writing that it does not have such information (or any portion thereof).
7. Westmount is directed to provide any mail correspondence received regarding the Mortgaged Property and Serial Number Property to the Receiver within 10 days of receipt thereof.

8. Abdul Sattar and Farhan Sattar are each directed to cause Westmount to comply with the obligations placed on it pursuant to this Order.

221 Alberta

9. Within seven (7) days of service of this Order, 221 Alberta is ordered to pay to the Receiver funds in the amount of \$40,485.93 in respect of security deposits.
10. Within 10 days of service of this Order, 221 Alberta is ordered to provide the Receiver with the information outlined in Annex "2" hereto or to confirm in writing that it does not have such information (or any portion thereof).
11. Abdul Sattar and Farhan Sattar are each directed to cause 221 Alberta to comply with the obligations placed on it pursuant to this Order.

197 Alberta

12. Within seven (7) days of service of this Order, 197 Alberta is ordered to pay to the Receiver funds in the amount of pay to the Receiver funds in the amount of:
 - (a) \$5,665.62 in respect of prepaid rent and related amounts for the month of May;
 - (b) \$3,675.00 in respect of prepaid rent for the month of June; and
 - (c) \$59,413.89 in respect of security deposits.
13. Within 10 days of service of this Order, 197 Alberta is ordered to provide the Receiver with the information outlined in Annex "3" hereto or to confirm in writing that it does not have such information (or any portion thereof).
14. Abdul Sattar and Farhan Sattar are each directed to cause 197 Alberta to comply with the obligations placed on it pursuant to this Order.

Service

15. Service of this Order may be effected on the Debtors by serving their counsel, Llewellyn Law at the email address cllewellyn@llewellynlaw.net, and service shall be deemed effective one day after being sent by email.

Justice of the Court of King's Bench of Alberta

ANNEX 1 TO THE ORDER

<u>Item Number</u>	<u>Description</u>
1.	Copies of such books and records as may exist for Westmount, reflecting payment of rents to date and going forward.
2.	Confirmation of any security deposits held by Westmount in connection with the prevailing tenancies, including amounts, location held and account information for each.
3.	Copies of the floor plans for each Mortgaged Property.
4.	Information on any existing or potential environmental concerns (e.g. hazardous waste, spills, asbestos, mold) and copies of all Phase I, II and III environmental site assessments and environmental remediation orders for each Mortgaged Property.
5.	An updated summary of aged accounts payable for Westmount, as concerns the Mortgaged Property, including but not limited to, any priority amounts owing to Canada Revenue Agency on account of GST or source deductions and any amounts owing to any municipal tax authority and what constitutes those amounts outstanding.
6.	An updated summary of any accounts receivable for Westmount related to the Mortgaged Property (in addition to rents receivable, demanded above), in the event any exist.
7.	Detailed fixed asset listing/register related to the Mortgaged Property as well as details of any assets that have been disposed of within the past year.
8.	Copies of any goods or services agreements as may relate to the above, and any appurtenant records and documentation to the same.
9.	Summary schedule of finance lease, operating lease and hire purchase contracts related to the Mortgaged Property.
10.	Information on any outstanding insurance claims, pending litigation or liens filed against or related to the Mortgaged Property.
11.	Copies of Bank facility agreements/letters related to the Mortgaged Property.
12.	Security System code for Albert Park.

ANNEX 2 TO THE ORDER

<u>Item Number</u>	<u>Description</u>
1.	Copies of such books and records as may exist for 221 Alberta, reflecting payment of rents to date and going forward.
2.	Confirmation of any security deposits held by 221 Alberta in connection with the prevailing tenancies, including amounts, location held and account information for each.
3.	Copies of the floor plans for any property owned by 221 Alberta.
4.	Information on any existing or potential environmental concerns (e.g. hazardous waste, spills, asbestos, mold) and copies of all Phase I, II and III environmental site assessments and environmental remediation orders for any property owned by 221 Alberta.
5.	An updated summary of aged accounts payable for 221 Alberta, including but not limited to, any priority amounts owing to Canada Revenue Agency on account of GST or source deductions and any amounts owing to any municipal tax authority and what constitutes those amounts outstanding.
6.	An updated summary of any accounts receivable for 221 Alberta, in the event any exist.
7.	Detailed fixed asset listing/register as well as details of any assets that have been disposed of within the past year.
8.	Copies of any goods or services agreements as may relate to the above, and any appurtenant records and documentation to the same.
9.	Summary schedule of finance lease, operating lease and hire purchase contracts.
10.	Information on any outstanding insurance claims, pending litigation or liens.
11.	Copies of Bank facility agreements/letters.
12.	Copies of most recent fire inspection reports.

ANNEX 3 TO THE ORDER

<u>Item Number</u>	<u>Description</u>
1.	Copies of all leases in place for all of all property of 197 Alberta.
2.	Copies of such books and records as may exist for 197 Alberta, reflecting payment of rents to date and going forward.
3.	Confirmation of any security deposits held by 197 Alberta in connection with the prevailing tenancies, including amounts, location held and account information for each.
4.	Copies of the floor plans for any property owned by 197 Alberta.
5.	Information on any existing or potential environmental concerns (e.g. hazardous waste, spills, asbestos, mold) and copies of all Phase I, II and III environmental site assessments and environmental remediation orders for any property owned by 197 Alberta.
6.	An updated summary of aged accounts payable for 197 Alberta, including but not limited to, any priority amounts owing to Canada Revenue Agency on account of GST or source deductions and any amounts owing to any municipal tax authority and what constitutes those amounts outstanding.
7.	An updated summary of any accounts receivable for 197 Alberta, in the event any exist.
8.	Detailed fixed asset listing/register as well as details of any assets that have been disposed of within the past year.
9.	Copies of any goods or services agreements as may relate to the above, and any appurtenant records and documentation to the same.
10.	Summary schedule of finance lease, operating lease and hire purchase contracts.
11.	Information on any outstanding insurance claims, pending litigation or liens.
12.	Copies of Bank facility agreements/letters.
13.	Copies of most recent fire inspection reports.