

McCarthy Tétrault LLP Suite 2500 1000 De La Gauchetière Street West Montréal QC H3B 0A2 Canada Cal: 544-397-4100

Tel: 514-397-4100 Fax: 514-875-6246

Jocelyn T. Perreault

Direct Line: (514) 397-7092 Email: jperreault@mccarthy.ca

Walker MacLeod

Direct Line: (403) 260-3710 Email: wmacleod@mccarthy.ca

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Via Email (krenno@imk.ca)

Karim Renno Irving Mitchell Kalichman LLP Place Alexis Nihon, Tour 2 Suite 1400, 3500, boulevard De Maisonneuve Ouest Montréal QC H3Z 3C1

Re: Homburg CCAA - Factual Information Request Regarding Lienholders' Claims

Dear Karim:

Pursuant to our email correspondence in connection with the claims (the "Claims") filed by Lafarge Canada Inc., Kai Construction Group and Centron Construction Corporation (collectively referred to as, the "Lienholders") against respectively CP Development Inc., Homco Realty Fund (88) Limited Partnership and North Calgary Land Ltd. (collectively referred to as, the "Debtors"), the Monitor needs to obtain and verify certain additional factual information in order to review and properly determine the alleged "secured" status of the Claims.

Specifically, the Monitor requests that the following questions with respect to <u>each</u> Claim be addressed:

- Was the respective Debtor in a direct contractual relationship with the applicable Lienholder and/or was it involved as subcontractor? (please describe the relationship of any parties contracting and or performing work for the Debtors with respect to each Claim, and provide any relevant supporting documents which have not already provided along with the respective Lienholder's proof of claim)
- What was the nature of any contractual relationship between the respective Debtor and Lienholder? (i.e., was there a single construction agreement with set completion dates or a work order relationship where the Lienholder periodically supplied services/materials to the Debtor)
- 3. What was the nature of the work performed/materials supplied? (i.e. were workers on site doing construction work or were the services engineering/architectural in nature)
- 4. Were any materials supplied and if so, where and when?
- 5. To the best of the Lienholder's knowledge, were any of the materials originally supplied later removed?

6. What date were any applicable contracts completed on and/or what was the last date that any work was performed or materials were supplied to the respective Debtor?

Accordingly, the Monitor respectfully requests that the Lienholders provide any documentation which addresses the aforementioned questions and/or would assist in the Monitor's review and determination of the alleged "secured" status of the Claims.

Should you have any additional questions please do not hesitate to contact the undersigned.

Yours truly,

ਨ੍ਹਾਂ Walker MacLeod / Jocelyn T. Perreault

WM/JTP