

Our File: 245534
June 18, 2024

To the Entities Listed in Schedule "A"

To Whom It May Concern:

**Re: In the matter of the Receivership of Royal Oaks Golf Club Inc.
Motion Returnable June 25, 2024, at 9:30 am at 10 Peel Plaza, Saint John, NB**

We represent the Receiver, Deloitte Restructuring Inc., with respect to the above-noted matter.

Please find enclosed for service upon you, the following documents:

- 1) Court-stamped copy of the Notice of Motion;
- 2) Court-stamped copy of the Affidavit of Michael Lach, sworn to on June 17, 2024; and
- 3) Court Stamped copy of the Second Report of the Court Appointed Receiver, dated June 17, 2024.

Please note that motion is scheduled to be heard on **June 25, 2024 at 9:30 am** at the Saint John Law Courts located at 10 Peel Plaza, Saint John, New Brunswick.

Please do not hesitate to contact the undersigned should you have any questions.

Yours very truly,


Tony S. Richardson

Enclosures

Schedule "A"

1. Edwin Ehrhardt, K.C.
Bingham Law
Marven's Place
1 Factory Lane, Suite 310
Moncton, NB E1C 9M3

Solicitors for Royal Oaks Golf Club Inc.

2. Josie Marks
Alana Waberski
Stewart McKelvey
Blue Cross Centre
644 Main Street, Suite 601
Moncton, NB E1C 1E2
Email: jmarks@stewartmckelvey.com

Solicitors for TWI Oaks Inc. and Esmond and Natalie Clouthier

3. George L. Cooper, K.C.
Cox & Palmer
Blue Cross Centre
644 Main Street, Suite 500
Moncton, NB E1C 1E2
Email: gcooper@coxandpalmer.com

Solicitors for HR Corporate Strategies Ltd. and Sunset CRE Investments LCP

4. Michael Brenton
Brenton Kean
75 Prince William Street
Saint John, NB E2L 2B2
Email: mdb@brentonkean.com

Solicitors for Walter Steven Lunn

5. **Office of the Superintendent in Bankruptcy**
Room 1605, Maritime Centre
1505 Barrington Street
Halifax, NS B3J 3K5
Email: osbservice-bsfservice@ised-isde.gc.ca

6. **Canada Revenue Agency**
100 – 145 Hobson's Lake Drive
Halifax NS B3S 0J1
Attn: Maeve Baird
Email: Maeve.baird@justice.gc.ca

7. **Ford Credit Canada Company**
PO Box 2400
Edmonton, AB T5J 5C7
Fax: 1-866-367-3888