

COURT FILE NUMBER	Q.B. No. 61 of 2018
COURT	COURT OF QUEEN'S BENCH FOR SASKATCHEWAN
JUDICIAL CENTRE	SWIFT CURRENT
PLAINTIFF/APPLICANTS	<b>INNOVATION CREDIT UNION</b>
DEFENDANTS/RESPONDENTS	<b>SWIFT HOTELS GROUP LTD., BRIAN OSTRANDER, OSTRANDER FAMILY HOLDINGS LTD., PHILIP KRAUN, PRIMEWEST MORTGAGE INVESTMENT CORPORATION, SWIFT MOTEL LTD., and BRUNSDON LAWREK &amp; ASSOCIATES</b>
DOCUMENT	<b>THIRD REPORT OF DELOITTE RESTRUCTURING INC., IN ITS CAPACITY AS COURT APPOINTED RECEIVER OF SWIFT HOTELS GROUP LTD.</b>

December 1, 2021

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

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## INTRODUCTION

1. Deloitte Restructuring Inc. (“**Deloitte**”) was appointed as interim receiver (the “**Interim Receiver**”), without security, of all the assets, undertakings, and properties (the “**Property**”) acquired for, or used in relation to the business carried on by Swift Hotels Group Ltd. (“**Swift Hotels**”, the “**Company**”, or the “**Debtor**”), specifically including the lands legally described as Surface Parcel #144225750 Blk/Par A, Plan No DX1385 Extension 0 (the “**Swift Current Hotel**”), pursuant to the Order of the Court of Queen’s Bench for Saskatchewan (the “**Court**”) dated September 20, 2019 (the “**Interim Receivership Order**”).
2. On October 18, 2019, pursuant to an application filed by Innovation Credit Union (“**Innovation**”), the Court granted an order extending the Interim Receivership Order to and including November 29, 2019.
3. On November 28, 2019 (the “**Date of Receivership**”), pursuant to a further application filed by Innovation, the Court granted an order (the “**Receivership Order**”) discharging the Interim Receiver and appointing Deloitte as the receiver (the “**Receiver**”) of the Property. A copy of the Receivership Order and other information regarding the interim receivership and receivership proceedings can be accessed on the Receiver’s website at [www.insolvencies.deloitte.ca/en-ca/SwiftGroup](http://www.insolvencies.deloitte.ca/en-ca/SwiftGroup) (the “**Receiver’s Website**”).
4. This report constitutes the third report of the Receiver (the “**Third Report**”), and is being filed to inform the Court of the following:
  - (a) The activities of the Receiver since the filing of its second report dated December 3, 2020 (the “**Second Report**”);
  - (b) The closing of the Swift Current Hotel sale transaction (the “**Sale Transaction**”) with 12547091 Canada Ltd. (the “**Purchaser**”);
  - (c) The status of the Related Party A/R (as defined below); and
  - (d) The status of the priority dispute between Innovation and Canada Revenue

Agency (“CRA”) in respect of CRA’s claim against Swift Hotels for \$313,717.67 in unremitted employee source deductions (the “**Disputed Priority Funds**”).

5. Further, this Third Report is being filed in support of the Receiver’s application to this Honourable Court to be heard on December 6, 2021, seeking the following items of relief:
  - (a) Approval of the reported actions of the Receiver since the filing of the Second Report in administering these receivership proceedings;
  - (b) Approval of the Receiver’s Residual Related Party A/R Powers (as defined below);
  - (c) Approval of the fees and disbursements of the Receiver and its legal counsel;
  - (d) Approval of the Receiver’s Statement of Receipts and Disbursements for the period November 28, 2019 to November 30, 2021; and
  - (e) An Order providing for the discharge of the Receiver.

#### **TERMS OF REFERENCE**

6. In preparing this Third Report, the Receiver has relied upon unaudited financial information, other information available to the Receiver and, where available and appropriate, Swift Hotels’ books and records and discussions with various parties.
7. The financial information of the Company has not been audited, reviewed or otherwise verified by the Receiver as to its accuracy or completeness, nor has it necessarily been prepared in accordance with generally accepted accounting principles and the reader is cautioned that this Third Report may not disclose all significant matters about the Company or its financial position. Additionally, none of the Receiver’s procedures were intended to disclose defalcations or other irregularities. If the Receiver were to perform additional procedures or to undertake an audit examination of the financial statements in accordance with generally accepted auditing standards, additional matters may have come to the Receiver’s attention. Accordingly, the Receiver does not express an opinion

nor does it provide any other form of assurance on the financial or other information presented herein. The Receiver may refine or alter its observations as further information is obtained or brought to its attention after the date of this Third Report.

8. The Receiver assumes no responsibility or liability for any loss or damage occasioned by any party as a result of the circulation, publication, reproduction or use of this Third Report. Any use which any party makes of this Third Report, or any reliance or decision to be made based on this Third Report, is the sole responsibility of such party.
9. Unless otherwise stated, all monetary amounts contained in this Third Report are expressed in Canadian dollars.
10. Capitalized terms used in this Third Report but not defined herein are as defined in the first report of the Receiver dated December 19, 2019 (the “**First Report**”), the Second Report, and the Receivership Order.

#### **ACTIVITIES OF THE RECEIVER**

11. Since the filing of the Second Report, the Receiver has undertaken the following activities:
  - (a) Attended the December 18, 2020 Court hearing in these proceedings;
  - (b) Completed the Sale Transaction with the Purchaser, and terminated insurance coverage on the Property upon closing;
  - (c) Terminated all staff retained by the Receiver upon closing the Sale Transaction, and facilitated the transition and employment of staff by the Purchaser;
  - (d) Closed various third-party vendor accounts established by the Receiver to facilitate the uninterrupted operations of the Swift Current Hotel during the receivership proceedings;
  - (e) Coordinated with the third-party property manager, Integrated Hospitality Management Ltd. (“**IHM**”), to obtain all books and records and financial

reporting related to the operations of the Swift Current Hotel during the proceedings, and terminated the engagement of IHM upon closing of the Sale Transaction;

- (f) Filed statutory returns with CRA (in regard to corporate tax and goods and services tax (“GST”)) and with the Saskatchewan Ministry of Finance (in regard to provincial sales tax (“PST”));
- (g) Facilitated communications between CRA and Innovation with respect to the Disputed Priority Funds;
- (h) Continued prosecution of the legal actions in respect of the Related Party A/R, whereby the Receiver had previously filed statements of claim against Odyssey Hotels Group Ltd. (for \$487,488), Ostrander Family Holdings (for \$388,465), Ostrander Family Trust (for \$1,970,000), Swift Hotels Partnership Group Ltd. (for \$61,257), and Swift Hotels Swift Current Group Ltd. (for \$94,438); and
- (i) Prepared, reviewed, and finalized this Third Report.

## SALE TRANSACTION

- 12. In accordance with the Sale Approval and Vesting Order dated December 18, 2020 (the “SAVO”) (attached hereto as Appendix A), the Receiver closed the Sale Transaction with the Purchaser on January 7, 2021 (the “Closing Date”). The Sale Transaction was completed on the Closing Date, and the Receiver’s Certificate (attached hereto as Appendix B) was filed with the Court on May 7, 2021, and was entered on May 10, 2021.
- 13. As the Receiver continued to offer credit to the Company’s corporate customers prior to the Closing Date, and continued to collect operating receipts subsequent to the Closing Date (at the request of the Purchaser) while the Purchaser established its payment processing accounts, the Receiver collected aggregate post-closing receipts of \$40,807.34 (the “Post-Closing Receipts”). Approximately \$24,844.41 of the Post-Closing Receipts related to accounts receivable owing to the Company as at the Closing Date (the “Post-Closing A/R Collections”). As the Post-Closing A/R Collections satisfied the accounts

receivable owing to the Company in full, the residual Post-Closing Receipts of \$15,962.93 were paid to the Purchaser on or about February 18, 2021.

## **RELATED PARTY A/R**

14. As detailed in the Second Report, as at the Date of Receivership, the following related party accounts receivable owing to the Company (collectively the “**Related Party A/R**”) were recorded in the books and records of the Company:
  - (a) 1764239 Alberta Ltd. - \$770,264;
  - (b) 1885731 Alberta Ltd. - \$137,004;
  - (c) Odyssey Hotels Group Ltd. (“**Odyssey**”) - \$487,488;
  - (d) Ostrander Family Holdings (“**OFH**”) - \$388,465;
  - (e) Ostrander Family Trust (“**OFT**”) - \$1,970,000;
  - (f) Swift Hotels Partnership Group Ltd. (“**SHPG**”) - \$61,257; and
  - (g) Swift Hotels Swift Current Group Ltd. (“**SHSCG**”) - \$94,438.
15. On July 22, 2020, on application by Innovation, 1764239 Alberta Ltd. (o/a HomeStay Inn) and 1885731 Alberta Ltd. (o/a HomeStay Express) (collectively the “**Insolvent Related Parties**”) were placed into Receivership by order of the Court of Queen’s Bench of Alberta. The Insolvent Related Parties filed an assignment in bankruptcy on May 31, 2021. Accordingly, no further recoveries are expected in regard to the Insolvent Related Parties.
16. As detailed in the Second Report, in early November 2020, the Receiver filed statements of claim commencing actions against:
  - (a) Odyssey (the “**Odyssey Action**”);
  - (b) OFH (the “**OFH Action**”);

- (c) OFT (the “**OFT Action**”);
- (d) SHPG (the “**SHPG Action**”); and
- (e) SHSCG (the “**SHSCG Action**”).

On February 19, 2021, statements of defence were filed by Odyssey, OFT, and SHPG.

17. Summarized below is the status of the remaining Related Party A/R accounts as at the date of this Third Report:

- (a) SHSCG – As SHSCG failed to file a statement of defence in the SHSCG Action, default judgment as against SHSCG was awarded to the Receiver on January 27, 2021, in the amount of \$96,237.17 (inclusive of costs) (the “**SHSCG Judgment**”) (attached hereto as Appendix C). The Receiver registered the SHSCG Judgment in the Saskatchewan Personal Property Registry (“**PPR**”) on January 28, 2021. MLT Aikins LLP (“**MLT Aikins**”), the Receiver’s legal counsel, conducted searches of the Saskatchewan Land Titles Registry and the PPR on January 29, 2021 to determine what assets of SHSCG may be available to enforce judgment against. As the searches did not disclose any exigible assets, no further enforcement steps have been taken and no further realizations are expected in regard to SHSCG.
- (b) OFH – The Receiver became aware of a limited statement of defence filed by OFH on March 25, 2021 (although the Receiver was not served with same). As the Receiver understands that Innovation has a registered judgment against OFH in the amount \$9,960,309.37, and as no assets of OFH have been identified to attach any judgment, the Receiver has not continued the OFH Action as no further realizations are expected.
- (c) OFT and SHPG – The Receiver has not identified any assets held by either OFT or SHPG to satisfy any potential judgment. Accordingly, after discussing the matter with Innovation, subject to the identification of any realizable assets, the Receiver does not propose to incur any further costs in pursuit of a judgment

against either OFT or SHPG.

- (d) Odyssey – On June 10, 2021, the Receiver filed summary judgment application materials with the Court of Queen’s Bench of Alberta in the Odyssey Action, seeking judgment against Odyssey in the amount of \$487,488.43. Although the Receiver has not been able to confirm whether Odyssey has any realizable assets, during the interim receivership proceedings, the Interim Receiver was advised by Philp Krahn, Chief Financial Officer of Odyssey (and back office accounting support provider to Swift Hotels), of an investment account maintained by Odyssey at The Toronto-Dominion Bank (“TD”). On October 29, 2021, the Receiver obtained judgment against Odyssey in the Odyssey Action in the amount of \$488,288.43 (inclusive of costs) (the “**Odyssey Judgment**”) (attached hereto as Appendix D). The Receiver has registered a Writ of Enforcement in the Alberta Personal Property Registry and has submitted a request to Alberta Land Titles to identify whether Odyssey owns any real property. As at the date of this Third Report, the Receiver has not identified any funds at TD. Accordingly, realizations resulting from the judgment against Odyssey remain uncertain.

18. As the Receiver has not formally discontinued the actions against OFH, OFT, and SHPG, nor has it been able to identify any realizable assets attributable to the Related Party A/R accounts to date, the Receiver respectfully requests Court approval to:

- (a) Collect on the SHSCG Judgment and the Odyssey Judgment in the event that any assets are identified;
- (b) Administer the prosecution of the OFH Action, the OFT Action, and the SHPG Action (if any assets are identified); and
- (c) Discontinue the OFH Action, the OFT Action, and the SHPG Action if determined by the Receiver (in its sole discretion) to be appropriate;

(collectively the “**Residual Related Party A/R Powers**”)

subsequent to its discharge.

19. In order to complete the Residual Related Party A/R Powers, the Receiver proposes to hold back \$12,000 (the “**Action Holdback**”) to address any costs (tariff or otherwise) that may arise in the event that the OFH Action, the OFT Action, and/or the SHPG Action is discontinued.

#### **DISPUTED PRIORITY FUNDS**

20. As detailed in the SAVO, the Receiver was ordered to hold back \$313,717.67 (the “**CRA Holdback**”) in respect of CRA’s claim against Swift Hotels for unremitted employee payroll source deductions, pending a written agreement to release same by CRA and Innovation, or further Order of the Court. On October 4, 2021, CRA and Innovation provided the Receiver with their written agreement comprising e-mail correspondence (attached hereto as Appendix E) to release the CRA Holdback to CRA, which the Receiver paid to CRA on October 6, 2021.

#### **FEES AND DISBURSEMENTS OF THE RECEIVER AND ITS LEGAL COUNSEL**

21. Paragraph 18 of the Receivership Order provides that the Receiver and its legal counsel shall pass their accounts from time to time. The Receiver is of the view that the primary party with an interest in regard to such accounts is Innovation, given that it holds a priority security interest over all of the Property of the Company. Innovation has been served with this Third Report and has been provided with all invoices of the Receiver within these proceedings.
22. Attached as Appendix F is a summary of the invoices of the Receiver for fees and disbursements incurred during the course of the proceedings for the period November 22, 2020 to September 30, 2021. The Receiver’s accounts total \$86,243 in fees and disbursements, excluding GST. The Receiver estimates that its fees and disbursements incurred subsequent to September 30, 2021, to attend the October 29, 2021 Odyssey summary judgement hearing, finalize this Third Report, prepare for and attend the December 6, 2021 hearing, and to finalize the Receiver’s discharge will approximate \$20,000 (plus GST) (the “**Estimated Receiver Fees**”).

23. The fees charged by the Receiver are based on the amount of professional time expended at hourly billing rates, which vary depending upon the experience level and location of professionals involved. The average blended hourly rate charged by the Receiver in these proceedings for invoices issued to date is \$353 per hour. The rates charged by the Receiver are the normal rates and charges for engagements of this nature, and are comparable to the rates charged for the provision of services by other professional firms providing specialized financial advisory services.
24. The Receiver is of the view that its fees and disbursements are fair and reasonable in the circumstances and have been duly rendered in response to the required and necessary duties of the Receiver in accordance with the provisions of the Receivership Order.
25. Attached as Appendix G is a summary of the invoices of the Receiver's legal counsel for fees and disbursements incurred during the course of the proceedings for the period November 1, 2020 to October 31, 2021. The accounts total \$57,879 in fees and disbursements excluding PST and GST. The Receiver's legal counsel estimates that its fees and disbursements for all activities following October 31, 2021, including time spent to prepare for and attend the December 6, 2021 hearing, and to assist with finalizing the Receiver's discharge will approximate \$20,000 (plus taxes) (the "**Estimated Legal Fees**").
26. The Receiver has reviewed the invoices rendered by its legal counsel and finds them reasonable and validly incurred in accordance with the provisions of the Receivership Order.

#### **STATEMENT OF RECEIPTS AND DISBURSEMENTS**

27. The Receiver has prepared a Statement of Receipts and Disbursements for the period November 28, 2019 to November 30, 2021 for the Company, a copy of which is attached hereto as Appendix H. Total receipts were \$6,167,456 and total disbursements were \$6,032,004, resulting in \$135,452 being held in trust by the Receiver (the "**Residual Trust Funds**").
28. As at the date of this Third Report, in accordance with the SAVO, the Receiver has

made the following interim distributions:

- (a) \$1,017,913.18 to the City of Swift Current in respect of outstanding property taxes;
  - (b) \$9,576.80 to the Government of Canada in respect of the Wage Earner Protection Program (“WEPP”);
  - (c) \$313,717.67 to CRA; and
  - (d) \$2,025,000.00 to Innovation on account of the Innovation Indebtedness (as defined in the Second Report).
29. Additionally, the Receiver has repaid to Innovation the \$250,000 (plus interest) borrowed by the Receiver from Innovation under the Court authorized Borrowing Facility (as defined in the Receivership Order) in full.

#### **APPROVALS SOUGHT**

30. The Receiver believes that, other than distributing the Residual Trust Funds (excluding the Action Holdback, the Estimated Receiver Fees, and the Estimated Legal Fees) and performing certain administrative matters, the Receiver’s mandate pursuant to the Receivership Order (the “**Receiver’s Mandate**”) is substantially complete.
31. For the reasons outlined above, the Receiver respectfully recommends that this Honourable Court grant an Order:
- (a) Approving all activities and actions of the Receiver since the filing of the Second Report to date in relation to the discharge of its duties pursuant to the Receivership Order, as such actions of the Receiver are more particularly described in this Third Report;
  - (b) Approving the Third Report filed by the Receiver in these proceedings;
  - (c) Approving the Residual Related Party A/R Powers and authorizing the Receiver to implement and administer the Action Holdback;

- (d) Approving the fees and disbursements of the Receiver and its legal counsel for the period November 22, 2020 to September 30, 2021, and November 1, 2020 to October 31, 2021, respectively;
- (e) Approving the Estimated Receiver Fees and the Estimated Legal Fees to complete the within application and to finalize the receivership proceedings, without the requirement for taxation or formal passing of accounts;
- (f) Approving the Receiver's Statement of Receipts and Disbursements for the period November 28, 2019 to November 30, 2021;
- (g) Providing that, upon payment of the Residual Trust Funds (less the Action Holdback and the holdback(s) for the Estimated Receiver Fees and the Estimated Legal Fees), and any amounts remaining from the Action Holdback, the Estimated Receiver Fees, and the Estimated Legal Fees, to Innovation, the Receiver shall be discharged as Receiver, provided that notwithstanding such discharge:
  - i) The Receiver shall remain Receiver for the performance of such routine administrative tasks as may be required to complete the administration of these proceedings;
  - ii) The Receiver shall retain the Residual Related Party A/R Powers until the Related Party A/R accounts have been resolved to the satisfaction of the Receiver and Innovation;
  - iii) The Receiver shall be authorized to distribute the additional receipts, if any, realized from the Related Party A/R to Innovation up to the amount of the Innovation Indebtedness; and
  - iv) The Receiver shall continue to have the benefit of the provisions of all Orders made in these proceedings, including all approvals, protections, and stays of proceedings in favor of Deloitte in its capacity as Receiver;
- f) Providing that Deloitte shall be discharged from any and all liability, save and

except for any liability arising out of gross negligence or willful misconduct on the part of the Receiver; and

- (h) Granting such further and other relief that the Court considers just and warranted in the circumstances.

All of which is respectfully submitted at Winnipeg, Manitoba, this 1<sup>st</sup> day of December 2021.

**DELOITTE RESTRUCTURING INC.**

In its capacity as Receiver of  
Swift Hotels Group Ltd.,  
and not in its personal capacity.



Per: Brent Warga, CPA, CA, CIRP, LIT  
Senior Vice-President

## **Appendix A – Sale Approval and Vesting Order**

COURT FILE NUMBER

Q.B. 61 of 2018

COURT OF QUEEN'S BENCH FOR SASKATCHEWAN  
IN BANKRUPTCY AND INSOLVENCY

JUDICIAL CENTRE

SWIFT CURRENT

IN THE MATTER OF THE RECEIVERSHIP OF SWIFT HOTELS GROUP LTD.

**DUPLICATE ORIGINAL**  
**SALE APPROVAL AND VESTING ORDER**

Before the Honourable Mr. Justice R.S. Smith in Chambers the 18th day of December, 2020.

On the application of Jeffrey M. Lee, Q.C. and Marek Coutu, counsel on behalf of Deloitte Restructuring Inc. (the "**Receiver**") in its capacity as the Court-appointed receiver of the assets, undertakings and properties of Swift Hotels Group Ltd. (the "**Debtor**") pursuant to the Order of this Court made on November 28, 2019 (the "**Receivership Order**"), and upon hearing from Jeffrey M. Lee, Q.C., counsel on behalf of the Receiver, and upon reading the Notice of Application dated December 4, 2020, the Second Report of the Receiver dated December 3, 2020 (the "**Second Report**"), the Confidential Supplement to the Second Report of the Receiver dated December 3, 2020 (the "**Confidential Supplement**"), the Brief of Law on behalf of the Receiver and a proposed draft Order, all filed; and the pleadings and proceedings herein:

The Court Orders:

**SERVICE**

1. Service of the Notice of Application on behalf of the Receiver and the materials filed in support thereof (collectively, the "**Application Materials**") shall be and is hereby deemed to be good and valid and, further, shall be and is hereby abridged, such that service of such Application Materials is deemed to be timely and sufficient.

**APPROVAL OF TRANSACTION**

2. The sale transaction (the "**Transaction**") contemplated by an asset purchase agreement (the "**Sale Agreement**") between the Receiver and First Canadian Management Corporation dated September 13, 2020, and amended on October 29, 2020 and November 2, 2020, respectively, and appended to the Confidential Supplement of the Receiver, for the sale to First Canadian Management Corporation (or its nominee) of the Debtor's right, title and interest in and to the assets described in the Sale Agreement (the "**Purchased Assets**") is declared to be commercially reasonable and in the best interests of the Debtor and its creditors and other stakeholders and is hereby authorized and approved, with such minor amendments as the Receiver may deem necessary. For clarity, 12547091 Canada Ltd. is the nominee of First Canadian Management Corporation and 12547091 Canada Ltd. is hereinafter referred to as the "**Purchaser**".
3. The Receiver is hereby authorized and directed to take such additional steps and execute such additional documents as may be necessary or desirable (including any steps necessary or desirable to satisfy and/or comply with any applicable laws, regulations or orders of any courts, tribunals, regulatory bodies or administrative bodies in any jurisdiction in which the Purchased Assets may be located) for the completion of the Transaction or for the conveyance of the Purchased Assets to the Purchaser, subject to such amendments as the Receiver and the Purchaser may agree upon, provided that any such amendments do not materially affect the Purchase Price.

## VESTING OF PROPERTY

4. Upon the Receiver determining that the proposed Transaction has closed to its satisfaction and on terms substantially as approved by this Honourable Court pursuant to this Order, the Receiver shall deliver to the Purchaser a Receiver's certificate substantially in the form set out in **Schedule "A"** hereto (the "**Receiver's Certificate**").
5. The Receiver may rely on written notices from the Purchaser regarding fulfillment or, if applicable, waiver of conditions to closing of the Proposed Sale under the Sale Agreement and shall have no liability with respect to the delivery of the Receiver's Certificate.
6. Upon delivery of the Receiver's Certificate all of the Debtor's right, title and interest in and to the Purchased Assets described in the Sale Agreement and listed on **Schedule "B"** hereto shall, save and except for the encumbrances listed in **Schedule "C"** hereto (the "**Permitted Encumbrances**"), vest absolutely in the name of the Purchaser, free and clear of and from any and all security interests (whether contractual, statutory, or otherwise), hypothecs, interests, mortgages, trusts or deemed trusts (whether contractual, statutory, or otherwise), liens, judgments, enforcement charges, levies, charges, or other financial or monetary claims (collectively, "**Encumbrances**") and all rights of others, whether or not they have attached or been perfected, registered or filed and whether secured, unsecured or otherwise (collectively, the "**Claims**") including, without limiting the generality of the foregoing:
  - (a) any encumbrances or charges created by the Receivership Order;
  - (b) all charges, security interests or claims evidenced by registrations pursuant to *The Personal Property Security Act, 1993* SS 1993, c P-6.2, or any other personal property registry system; and
  - (c) those Encumbrances listed in **Schedule "D"** hereto;

and, for greater certainty, this Court orders that all of the Encumbrances (save and except for the Permitted Encumbrances) affecting or relating to the Purchased Assets are hereby expunged and discharged as against the Purchased Assets.

7. Upon delivery of the Receiver's Certificate to the Purchaser, the Receiver shall be and is hereby authorized to effect such discharges or revisions in the Saskatchewan Personal Property Registry as may be reasonably required to conclude the Transaction.
8. Pursuant to section 109 of *The Land Titles Act, 2000*, SS 2000, c L-5.1 and section 12 of *The Queen's Bench Act, 1998*, SS 1998, c Q-1.01 the Saskatchewan Registrar of Titles shall be and is hereby directed:
  - (a) to accept an application (the "**Land Titles Application**") to surrender the existing title to the real property legally described as:

Surface Parcel #144225750, Blk/Par A Plan No DX1385 Extension 0, as described on Certificate of Title 86SC07538

(the "**Real Property**")

and to set up a new title to such Real Property in the name of the Purchaser as owner free and clear of any and all Encumbrances, save and except for the Permitted Encumbrances as set out in Schedule "C"; and

- (b) for greater certainty, to discharge all interests described in Schedule "D" hereto.
9. Any and all registration charges and fees payable in regard to the Land Titles Application shall be to the account of the Purchaser.
  10. For the purposes of determining the nature and priority of the Encumbrances:
    - (a) the net proceeds from the sale of the Purchased Assets (the "**Net Sale Proceeds**") shall stand in the place and stead of the Purchased Assets; and
    - (b) from and after the delivery of the Receiver's Certificate to the Purchaser, all Encumbrances and all rights of others shall attach to the Net Sale Proceeds from the sale of the Purchased Assets with the same priority as they had with respect to the Purchased Assets immediately prior to the sale, as if the Purchased Assets had not been sold and remained in the possession or control of the person having that possession or control immediately prior to closing of the Transaction.
  11. The Purchaser shall, by virtue of the completion of the Transaction, have no liability of any kind whatsoever in respect of any Claims against the Debtor.
  12. The Debtor and all persons who claim by, through or under the Debtor in respect of the Purchased Assets, save and except for the persons entitled to the benefit of the Permitted Encumbrances, shall stand absolutely barred and foreclosed from all estate, right, title, interest, royalty, rental and equity of redemption of the Purchased Assets and, to the extent that any such person remains in possession or control of any of the Purchased Assets, they shall forthwith deliver possession thereof to the Purchaser.
  13. The Purchaser shall be entitled to enter into and upon, hold and enjoy the Purchased Assets for its own use and benefit without any interference of or by the Debtor, or any person claiming by or through or against the Debtor.
  14. Immediately after the closing of the Transaction, the holders of the Permitted Encumbrances shall have no claim whatsoever against the Receiver or the Debtor.
  15. Forthwith after the delivery of the Receiver's Certificate to the Purchaser, the Receiver shall file a copy of the Receiver's Certificate with the Court, and shall serve a copy of the Receiver's Certificate on the recipients listed in the Service List maintained with respect to these proceedings.
  16. Pursuant to clause 7(3)(c) of the *Personal Information Protection and Electronic Documents Act*, SC 2000, c 5, the Debtor and the Receiver are hereby authorized and permitted to disclose and transfer to the Purchaser all human resources and payroll information in the Debtor's records pertaining to the Debtor's past and current employees. The Purchaser shall maintain and protect the privacy of such information and shall be entitled to use the personal information provided to it in a manner which is in all material respects identical to the prior use of such information by the Debtor.
  17. Notwithstanding:
    - a) the pendency of these proceedings;

- b) any applications for a bankruptcy order now or hereafter issued pursuant to the *Bankruptcy and Insolvency Act* (Canada) in respect of the Debtor and any bankruptcy order issued pursuant to such applications;
- c) any assignment in bankruptcy made in respect of the Debtor; and
- d) the provisions of any federal statute, provincial statute or any other law or rule of equity,

the vesting of any of the Purchased Assets in the Purchaser pursuant to this Order and the obligations of the Debtor under the Sale Agreement, shall be binding on any trustee in bankruptcy that has been or that may in future be appointed in respect of the Debtor and shall not be void or voidable by creditors of the Debtor, nor shall it constitute nor be deemed to be a settlement, fraudulent preference, assignment, fraudulent conveyance, transfer at undervalue, or other reviewable transaction under the *Bankruptcy and Insolvency Act*, RSC 1985, c B-3 or any other applicable federal or provincial legislation, nor shall it constitute oppressive or unfairly prejudicial conduct pursuant to any applicable federal or provincial legislation.

18. The Transaction is exempt from any requirement under any applicable federal or provincial law to obtain shareholder approval and is exempt from the application of any bulk sales legislation in any Canadian province or territory.

#### **APPROVAL OF DISTRIBUTIONS**

19. The Receiver is authorized and directed to deal with the Net Sale Proceeds as follows:
- (a) the Receiver shall maintain a residual holdback (the "**Residual Holdback**") in full and final satisfaction of the Receiver's Charge, to be applied to:
    - (i) any outstanding professional fees and disbursements of the Receiver and the Receiver's legal counsel, MLT Aikins LLP, as of the date of this Order; and
    - (ii) such further fees and disbursements as may be incurred in the performance of such incidental duties by the Receiver or MLT Aikins LLP as may be required to complete the administration of these proceeds and apply for the Receiver's discharge; and
  - (b) after the deduction of the Residual Holdback from the remaining balance of the Net Sale Proceeds, the Receiver is hereby authorized and directed to make the following holdbacks and distributions:
    - (i) a distribution to the City of Swift Current in the amount of \$1,017,913.18 in respect of outstanding property taxes on the Real Property;
    - (ii) a holdback (to be held by the Receiver, until directed to release same by written agreement of Canada Revenue Agency and Innovation Credit Union, or further Order of the Court, whichever shall first occur) of the amount of \$313,717.67 in respect of Canada Revenue Agency's claim against the Debtor for unremitted employee source deduction arrears;
    - (iii) a distribution to the Government of Canada, in the amount of \$9,576.80 in respect of the Debtor's obligations pursuant to the *Wage Earner Protection Program Act*; and
    - (iv) to Innovation Credit Union ("**Innovation**"), after making the payments described above in paragraphs 19(a)(i), 19(a)(ii), 19(b)(i), 19(b)(ii), and 19(b)(iii) hereof, the Receiver shall pay the remainder of the Net Sale Proceeds to Innovation on account of the additional amounts owing by the Debtor to Innovation, which amounts were formerly

secured by Innovation's first mortgage, assignment of rents and general security agreement in respect of the Purchased Assets.

#### **MISCELLANEOUS MATTERS**

20. The Receiver, the Purchaser and any other interested party, shall be at liberty to apply for further advice, assistance and directions as may be necessary in order to give full force and effect to the terms of this Order and to assist and aid the parties in closing the Transaction, including, without limitation, an application to the Court to deal with interests which are registered against title to the Real Property after the time of the granting of this Order.
21. This Court hereby requests the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or in the United States to give effect to this Order and to assist the Receiver and its agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders as to provide such assistance to the Receiver, as an officer of this Court, as may be necessary or desirable to give effect to this Order or to assist the Receiver and its agents in carrying out the terms of this Order.
22. Service of this Order on any party not attending this application is hereby dispensed with. Parties attending this application shall be served in accordance with the Electronic Case Information and Service Protocol adopted in the Receivership Order.

#### **APPROVAL OF ACTIVITIES AND DISBURSEMENTS OF THE RECEIVER**

23. All activities, actions and proposed courses of action of the Receiver to date in relation to the discharge of its duties and mandate as receiver of the Property, as such Actions of the Receiver are more particularly described in the First Report of the Receiver dated December 11, 2019, the Second Report and the Confidential Supplement, as well as the statement of receipts and disbursements contained in the Report, shall be and are hereby approved and confirmed.
24. The professional fees and disbursements of the Receiver, as set out in the Second Report, are hereby approved without the necessity of a formal passing of its accounts.
25. The professional fees and disbursements of the Receiver's legal counsel, MLT Aikins LLP, as set out in the Second Report, are hereby approved without the necessity of a formal assessment of its accounts.

#### **SEALING ORDER**

26. Counsel for the Receiver having complied with Practice Directive #3, the Confidential Supplement shall be kept sealed and confidential and shall not form part of the public record, but rather shall be placed, kept separate and apart from all other contents of the Court file, in sealed envelopes each of which shall bear a notice which sets out the title of these proceedings and a statement that the contents are subject to a sealing order and shall only be opened upon further order of the Court or upon the filing of the Receiver's Certificate.

**ISSUED** at Swift Current, Saskatchewan, this 18<sup>th</sup> day of December, 2020.



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(Deputy) Local Registrar

**CONTACT INFORMATION AND ADDRESS FOR SERVICE:**

Name of the firm:	MLT Aikins LLP
Lawyer in charge of file :	Jeffrey M. Lee Q.C. / Marek Coutu
Address of firm:	1201, 409 3 <sup>rd</sup> Avenue S, Saskatoon SK S7K 5R5
Telephone number:	306.975.7100
Fax number:	306.975.7145
Email address:	JMLee@mltaikins.com / MCoutu@mltaikins.com

**SCHEDULE "A"**

**FORM OF RECEIVER'S CERTIFICATE**

**COURT FILE NUMBER**                      **Q.B. 61 of 2018**

**COURT OF QUEEN'S BENCH FOR SASKATCHEWAN  
IN BANKRUPTCY AND INSOLVENCY**

**JUDICIAL CENTRE**                      **SWIFT CURRENT**

**IN THE MATTER OF THE RECEIVERSHIP OF SWIFT HOTELS GROUP LTD.**

**RECEIVER'S CERTIFICATE**

**RECITALS**

- A. Pursuant to an Order of the Honourable Mr. Justice R.S. Smith of the Court of Queen's Bench of Saskatchewan (the "**Court**") dated November 28, 2019, Deloitte Restructuring Inc. was appointed as the receiver (the "**Receiver**") of the assets, undertakings and property of Swift Hotels Group Ltd. (the "**Debtor**").
- B. Pursuant to an Order of the Court dated December 18, 2020, the Court approved the asset purchase agreement dated September 13, 2020, and amended on October 29, 2020 and November 2, 2020, respectively (the "**Sale Agreement**") between the Receiver and First Canadian Management Corporation and provided for the vesting in the nominee of First Canadian Management Corporation known as 12547091 Canada Ltd. (the "**Purchaser**") of the Debtor's right, title and interest in and to the Purchased Assets, which vesting is to be effective with respect to the Purchased Assets upon the delivery by the Receiver to the Purchaser of a certificate confirming (i) the payment by the Purchaser of the Purchase Price for the Purchased Assets; (ii) that the conditions to Closing as set out in sections 12 and 13 of the Sale Agreement have been satisfied or waived by the Receiver and the Purchaser; and (iii) the Transaction has been completed to the satisfaction of the Receiver.
- C. Unless otherwise indicated herein, terms with initial capitals have the meanings set out in the Sale Agreement.

**THE RECEIVER CERTIFIES** the following:

27. The Purchaser has paid and the Receiver has received the Purchase Price for the Purchased Assets payable on the Closing Date pursuant to the Sale Agreement;
28. The conditions to Closing as set out in sections 12 and 13 of the Sale Agreement have been satisfied or waived by the Receiver and the Purchaser;
29. The Transaction has been completed to the satisfaction of the Receiver; and

This Certificate was delivered by the Receiver at \_\_\_\_\_ on \_\_\_\_\_, **202**\_\_.

**DELOITTE RESTRUCTURING INC.**, in its capacity as Receiver of SWIFT HOTELS GROUP LTD., and not in its personal capacity.

Per: \_\_\_\_\_

**CONTACT INFORMATION AND ADDRESS FOR SERVICE:**

Name of the firm:	MLT Aikins LLP
Lawyer in charge of file :	Jeffrey M. Lee Q.C. / Marek Coutu
Address of firm:	1201, 409 3 <sup>rd</sup> Avenue S, Saskatoon SK S7K 5R5
Telephone number:	306.975.7100
Fax number:	306.975.7145
Email address:	JMLee@mltaikins.com / MCoutu@mltaikins.com

**SCHEDULE "B"**  
**PURCHASED ASSETS**

1. Real property in the City of Swift Current, Saskatchewan, legally described as follows:
  - a. Surface Parcel #144225750  
Reference Land Description: Blk/Par A Plan No DX1385 Extension 0  
As described on Certificate of Title 86SC07538
2. Personal property, more particularly described as follows:
  - a. All personal property of Swift Hotels Group Ltd., whether tangible or intangible, including:
    - i. chattels of every nature or kind whatsoever, such as furniture, equipment, tools, utensils, vehicles, linens and fabrics;
    - ii. inventory; and
    - iii. any other personal property of Swift Hotels Group Ltd. used in the operation of the Days Inn Hotel located at 105 George Street West, Swift Current, Saskatchewan;
  - b. Notwithstanding the preceding paragraphs, the Purchased Assets will exclude Swift Hotels Group Ltd.'s interest in all accounts receivable accrued prior to the Closing Date, as defined in the Sale Agreement.

**SCHEDULE "C"  
PERMITTED ENCUMBRANCES**

Nil.

**SCHEDULE "D"**  
**ENCUMBRANCES TO BE DISCHARGED**

1. Mortgage registered in favour of Innovation Credit Union, bearing the interest register #115964950;
2. Assignment of Rents registered in favour of Innovation Credit Union, bearing the interest register #115964961;
3. Mortgage registered in favour of Primewest Mortgage Investment Corporation, bearing the interest register #120800168;
4. Assignment of Rents registered in favour of Primewest Mortgage Investment Corporation, bearing the interest register #120848384;
5. Mortgage registered in favour of Swift Motel Ltd., bearing the interest register #120879175;
6. Miscellaneous Interest registered in favour of Primewest Mortgage Investment Corporation, bearing the interest register #121689467;
7. Miscellaneous Interest registered in favour of Primewest Mortgage Investment Corporation, bearing the interest register #121825212;
8. Mortgage registered in favour of Ostrander Family Holdings Ltd., bearing the interest register #122265413;
9. Enforcement Charge – Provincial Judgment registered in favour of Brunsdon Lawrek & Associates, bearing the interest register #122647899;
10. Tax Lien registered in favour of the City of Swift Current, bearing the interest register #123188148; and
11. Builders' Lien registered in favour of LMO Landscaping Ltd., bearing the interest register #123683531.

**Appendix B – Receiver’s Certificate**

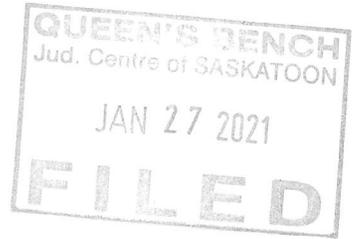


**CONTACT INFORMATION AND ADDRESS FOR SERVICE:**

Name of the firm:	MLT Aikins LLP
Lawyer in charge of file :	Jeffrey M. Lee Q.C. / Marek Coutu
Address of firm:	1201, 409 3 <sup>rd</sup> Avenue S, Saskatoon SK S7K 5R5
Telephone number:	306.975.7100
Fax number:	306.975.7145
Email address:	JMLee@mltaikins.com / MCoutu@mltaikins.com

**Appendix C – Swift Hotels Swift Current Group Ltd. Judgment**





COURT FILE NUMBER Q.B. No. 1334 of 2020  
 COURT OF QUEEN'S BENCH FOR SASKATCHEWAN  
 JUDICIAL CENTRE SASKATOON  
 PLAINTIFF SWIFT HOTELS GROUP LTD., BY ITS RECEIVER, DELOITTE RESTRUCTURING INC.  
 DEFENDANT SWIFT HOTELS SWIFT CURRENT GROUP LTD.

**JUDGMENT**

In Default of Defence In Case of Debt or Liquidated Demand  
And Certificate of Assessment of Costs

The 27<sup>th</sup> day of January, 2021.

The defendant, **Swift Hotels Swift Current Group Ltd.**, not having delivered any defence to the Statement of Claim, the Court orders that the plaintiff, by its receiver, recover from the defendant **Swift Hotels Swift Current Group Ltd.**, the sum of **\$94,887.17** and costs to be assessed.

K. Radom  
Deputy Local Registrar (seal)  
(Deputy) Local Registrar

The above costs have been assessed and allowed at \$1,350.00 this 27<sup>th</sup> day of January, 2021.

Claim	\$94,437.86
Interest	\$449.31
Costs	\$1,350.00
<b>Total:</b>	<b>\$96,237.17</b>

K. Radom  
Deputy Local Registrar (seal)  
(Deputy) Local Registrar

**CONTACT INFORMATION AND ADDRESS FOR SERVICE:**

Name of firm: MLT Aikins LLP  
 Lawyer in charge of file: Jeffrey M. Lee, Q.C.  
 Address of firm: 1201, 409 3<sup>rd</sup> Avenue South, Saskatoon SK S7K 5R5  
 Telephone number: 306.975.7136  
 Fax number: 306.975.7145  
 Email address: JMLee@mltaikins.com  
 File No: 56074.14

## **Appendix D – Odyssey Hotels Group Ltd. Judgment**



COURT FILE NUMBER 2001-14622

COURT COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

PLAINTIFF SWIFT HOTELS GROUP LTD., by its RECEIVER, DELOITTE RESTRUCTURING INC.

DEFENDANT ODYSSEY HOTELS GROUP LTD.

**DOCUMENT ORDER**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT MLT AIKINS LLP  
2100, 222 - 3rd Avenue S.W.  
Calgary, Alberta T2P 0B4  
Phone: 403.693.4300  
Fax: 403.508.4349  
Attention: Jeffrey M. Lee, Q.C. / Kaitlin Ward  
File: 0056074.00014

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**DATE ON WHICH ORDER WAS PRONOUNCED: OCTOBER 29, 2021**

**LOCATION OF HEARING OR TRIAL: CALGARY, ALBERTA**

**NAME OF MASTER WHO MADE THIS ORDER: J.L. MASON**

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**UPON** the Application of the Plaintiff, Swift Hotels Group Ltd., by its Receiver, Deloitte Restructuring Inc. ("**Swift Hotels**"), for an Order for Summary Judgment against Odyssey Hotels Group Ltd. (the "**Defendant**"); **AND UPON HAVING** read the Report of the Receiver, Deloitte Restructuring Inc., filed on June 10, 2021; **AND UPON HAVING** read the Affidavit of Service of Nishaljeet Khangura, affirmed and filed on July 27, 2021; **AND UPON HAVING** read the Supplement to the Summary Judgment Report of the Receiver, Deloitte Restructuring Inc., filed on September 10, 2021; **AND UPON HAVING** read the Affidavit of Service of Nishaljeet Khangura, affirmed and filed on October 26, 2021; **AND UPON HEARING** from counsel for Swift Hotels and all other interested parties present:

**IT IS HEREBY ORDERED THAT:**

1. Swift Hotels is awarded judgment against the Defendant in the amount of \$487,488.43.
2. Swift Hotels is awarded costs of the Action against the Defendant in the amount of \$800.00.



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Master of the Court of Queen's Bench of Alberta

**Appendix E – Canada Revenue Agency / Innovation Credit Union Correspondence**

**From:** [Smith, David J.](#)  
**To:** [Jeff Lee](#)  
**Cc:** [Coates, Beverly](#)  
**Subject:** FW: Swift Hotels Group Ltd. - Residual Holdback Our file 14637-123  
**Date:** Monday, October 4, 2021 10:28:24 AM  
**Attachments:** [IMAGE.png](#)

---

External Sender

Hi Jeff

Further to Mr. Sandbeck and Ms. Joyce's email below, please contact me about paying the \$313,718 Residual Holdback to the CRA.

Thanks

Dave

(306) 491-0058

---

**From:** SHELLEY JOYCE <SJOYCE@owzw.com>  
**Sent:** October 4, 2021 8:24 AM  
**To:** JMLee@mltaikins.com  
**Cc:** Smith, David J. <David.Smith@justice.gc.ca>; Randy SANDBECK <RSANDBECK@owzw.com>  
**Subject:** Swift Hotels Group Ltd. - Residual Holdback Our file 14637-123

Jeff,

As you are aware, our office has been involved in discussions with David Smith, counsel for CRA, over the last several months, in an effort to negotiate a mutually agreeable resolution for payment of the Residual Holdback being maintained by the Receiver in this matter.

We were advised by Mr. Smith on September 17, 2021 that the conclusion of his office and CRA is that his client is entitled to the entire \$313,718 Residual Holdback being held by the Receiver. This was a disappointing response to have received in the circumstances of this case given the information we provided, the substantial losses suffered by our client and the costs the Credit Union has incurred in this matter.

Since having received CRA's position we have consulted with Innovation Credit Union regarding its options. Our client has instructed us to advise that it is not in a position to incur further time and costs required to pursue additional legal proceedings in this matter. Innovation Credit Union will not be advancing any further claim to the Residual Holdback. The Receiver may address pay out of the Residual Holdback directly with CRA/Mr. Smith.

We believe this matter should now be concluded. Thank you.

**Randall M. Sandbeck, Q.C.**

Partner

and

**Shelley Joyce**

Partner



T: 306.347.2109

F: 306.352.0771

[sjoyce@owzw.com](mailto:sjoyce@owzw.com)

1000 - 2002 Victoria Ave

Regina, SK S4P 0R7

[owzw.com](http://owzw.com)

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## **Appendix F – Fees and Disbursements of the Receiver**

**SWIFT HOTELS GROUP LTD.**

**SUMMARY OF RECEIVER FEES AND DISBURSEMENTS**

<b>Date</b>	<b>Invoice #</b>	<b>Fees</b>	<b>Disbursements</b>	<b>GST</b>	<b>Total</b>	<b>Hours</b>
24-Jan-21	8001571030	\$ 42,535	\$ -	\$ 2,127	\$ 44,662	113.9
5-May-21	8001794110	24,428	-	1,221	25,649	71.3
23-Jul-21	8001968237	9,485	-	474	9,959	24.8
5-Oct-21	8002113368	9,795	-	490	10,285	26.5
<b>Total</b>		<b>\$ 86,243</b>	<b>\$ -</b>	<b>\$ 4,312</b>	<b>\$ 90,555</b>	<b>236.5</b>



**Invoice 8001571030**

**Deloitte Restructuring Inc.**

360 Main St  
Suite 2300  
Winnipeg MB R3C 3Z3

ATTN: Brad Appel  
Innovation Credit Union  
P.O. Box 1090 Stn Main  
Swift Current SK S9H 3X3  
Canada

Tel: (204) 942-0051  
Fax: (204) 947-9390  
www.deloitte.ca

Date: January 25, 2021  
Client No.: 1143860  
WBS#: INN00170  
Engagement Partner: Brent Warga  
GST Registration: 133245290RT0001

**For professional services rendered**

**Fees**

In accordance with the Receivership Order dated November 28, 2019.

Time incurred for the period November 22, 2020 to January 22, 2021.

B. Warga - Partner (34.6 hrs): 16,435.00  
B. Taylor - Partner (0.8 hrs): 380.00  
A. Adlington - Partner (1.0 hrs): 475.00  
J. Fritz - Senior Manager (47.8 hrs): 17,925.00  
T. Dew - Senior Consultant (29.0 hrs): 7,250.00  
A. Keene - Technician (0.7 hrs): 70.00  
Total (113.9 hrs): 42,535.00

GST applicable 42,535.00

**Sales Tax**

GST at 5.00 % 2,126.75

**Total Amount Due (CAD) 44,661.75**

Accounts shall be due and payable when rendered. Interest shall be calculated at a simple daily rate of 0.0493% (equivalent to 18% per annum). Interest shall be charged and payable at this rate on any part of an account which remains unpaid from thirty(30) days after the invoice date to the date on which the entire account is paid.

**SWIFT HOTELS GROUP LTD.  
RECEIVER'S TIME SUMMARY  
INVOICE NO: 8001571030**

Date	Name	Hours	Total	Description
11/22/2020	Warga, Brent	1.5	\$ 712.50	Review and updates to Second Report and Confidential Report.
11/23/2020	Fritz, John	0.6	225.00	Call with party with third party goods; sales process and secured creditor correspondence.
11/23/2020	Warga, Brent	0.8	380.00	E-mail correspondence with MLT Aikins re: bankruptcy proceedings; e-mail to B. Appel re: same.
11/24/2020	Fritz, John	1.4	525.00	Review and correspondence with counsel re: security opinion; operational and sales process correspondence.
11/24/2020	Warga, Brent	0.6	285.00	Review of security opinion; review of correspondence to/from MLT Aikins; e-mail correspondence with B. Appel re: update call.
11/25/2020	Dew, Todd	0.5	125.00	Trust accounting.
11/25/2020	Fritz, John	2.7	1,012.50	Call with primary secured creditor and counsel re: sales process and insolvency proceedings; call with Receiver's counsel re: property tax and sales process matters; review of correspondence from IHM and compilation of closing items; preparation for IHM call.
11/25/2020	Warga, Brent	2.1	997.50	Call with Innovation and legal counsel re: court hearing and bankruptcy filing; call with MLT Aikins re: property tax appeal options.
11/26/2020	Dew, Todd	0.4	100.00	Trust accounting.
11/26/2020	Fritz, John	1.8	675.00	Call with IHM re: closing matters; approval and request for payment of outstanding supplier invoices.
11/26/2020	Warga, Brent	1.1	522.50	Call with IHM re: closing and file matters; review of various e-mail correspondence; review of bankruptcy documents.
11/27/2020	Dew, Todd	1.0	250.00	Processing of payables.
11/27/2020	Fritz, John	4.5	1,687.50	Review of Court reporting; review and compilation of supporting documentation for disbursements; operational matters with C. King.
11/27/2020	Warga, Brent	2.4	1,140.00	Review and signing of cheques; updates to R&D; updates to Second Report; review of bankruptcy documents.
11/28/2020	Warga, Brent	1.0	475.00	Review of draft Second and Confidential Reports.
11/30/2020	Dew, Todd	0.4	100.00	Update banking; email to/from IHM.
11/30/2020	Fritz, John	0.5	187.50	Call with insurer re: renewal, potential modification of policy, cancellation terms, and assignment; correspondence with General Manager re: operational matters.
11/30/2020	Warga, Brent	0.3	142.50	Review of various e-mail correspondence.
12/2/2020	Dew, Todd	1.0	250.00	Processing of payables.
12/2/2020	Warga, Brent	2.6	1,235.00	Updates to Reports with legal comments; review and comments to MLT Aikins on application materials.
12/3/2020	Dew, Todd	1.0	250.00	Trust accounting and payables processing.
12/3/2020	Fritz, John	0.9	337.50	Review and authorization for payment of supplier accounts; Court reporting matters.
12/3/2020	Warga, Brent	2.5	1,187.50	Review of various e-mail correspondence; updates to Court Reports; provision of Reports to Innovation and MLT Aikins.
12/3/2020	Taylor, Robert	0.4	190.00	QAR Confidential Supplement Report.
12/3/2020	Taylor, Robert	0.4	190.00	QAR Report.
12/4/2020	Dew, Todd	1.0	250.00	Trust accounting and payables processing; correspondence with IHM.
12/4/2020	Fritz, John	2.0	750.00	Correspondence with General Manager re: operational matters; Court Report finalization.
12/4/2020	Warga, Brent	2.4	1,140.00	Review and finalization of Second Report and Confidential Second Report; review and signing of cheques.
12/4/2020	Adlington, Ryan	1.0	475.00	QAR Court Reports.
12/5/2020	Fritz, John	0.6	225.00	Correspondence to purchaser re: agreements, licenses and leases, and potential transfer arrangements.
12/6/2020	Warga, Brent	0.5	237.50	Updates to R&D.
12/7/2020	Keene, Ashley	0.5	50.00	Website updates.
12/7/2020	Warga, Brent	0.2	95.00	E-mail correspondence to/from JLL.
12/8/2020	Dew, Todd	1.0	250.00	Preparation of GST and PST returns for November 2020; review emails re: payables.
12/8/2020	Fritz, John	0.2	75.00	Correspondence with General Manager re: operational matters.
12/8/2020	Warga, Brent	0.4	190.00	Review of various e-mail correspondence re: file matters.
12/9/2020	Warga, Brent	0.3	142.50	Review of various e-mail correspondence.
12/10/2020	Fritz, John	1.5	562.50	Correspondence with General Manager re: operational matters; call with IHM re: sales process and operational matters; review and request for supplier payments.
12/10/2020	Warga, Brent	0.3	142.50	Call with IHM re: operational matters.
12/11/2020	Dew, Todd	4.0	1,000.00	Processing of payables; GST and PST returns; trust accounting.
12/11/2020	Fritz, John	0.5	187.50	Creditor call and meeting of creditor matters.
12/11/2020	Warga, Brent	0.7	332.50	Review and signing of cheques.
12/12/2020	Warga, Brent	0.3	142.50	Updates to R&D.
12/13/2020	Dew, Todd	0.4	100.00	Trust accounting.
12/14/2020	Fritz, John	0.3	112.50	Correspondence with realtor re: closing matters.
12/15/2020	Warga, Brent	0.3	142.50	Review of various e-mail correspondence re: transaction closing.
12/16/2020	Dew, Todd	0.5	125.00	Email to/from IHM with bank statements and invoices.
12/16/2020	Fritz, John	0.2	75.00	Operational correspondence with General Manager.
12/16/2020	Warga, Brent	0.5	237.50	E-mail correspondence with MLT Aikins re: hearing; review of various e-mail correspondence re: operations and closing.
12/17/2020	Dew, Todd	2.5	625.00	Trust accounting; processing of payables.
12/17/2020	Fritz, John	2.2	825.00	Review and request for supplier payments; call with IHM re: closing matters and operational update; payroll supplier correspondence re: remittance matters; call with counsel re: Court hearing and draft order.
12/17/2020	Warga, Brent	0.6	285.00	Call with IHM re: operations; call with MLT Aikins re: draft order.
12/18/2020	Dew, Todd	1.0	250.00	Processing of payables; trust accounting.
12/18/2020	Keene, Ashley	0.2	20.00	Website update.
12/18/2020	Warga, Brent	1.4	665.00	Attendance at Court hearing; website postings; review and signing of cheques; call with OWZW and counsel to CRA.
12/19/2020	Warga, Brent	0.4	190.00	Updates to R&D.
12/21/2020	Fritz, John	0.7	262.50	Correspondence to purchaser re: SAVO and closing process.
12/22/2020	Dew, Todd	1.0	250.00	Trust accounting.
12/22/2020	Fritz, John	1.1	412.50	Closing matters; correspondence with counsel; draft contractor correspondence; review of and request for supplier payables.
12/22/2020	Warga, Brent	0.5	237.50	Signing of cheques; review of termination notice; e-mail correspondence with MLT Aikins re: same.
12/23/2020	Dew, Todd	0.6	150.00	Trust accounting.
12/23/2020	Fritz, John	1.1	412.50	Correspondence with counsel, IHM, General Manager, and purchaser re: closing matters and contract worker notification letters; review and arrangement for payment of supplier invoices.
12/23/2020	Warga, Brent	0.3	142.50	Review and signing of cheques.
12/24/2020	Fritz, John	0.8	300.00	Call and correspondence with IHM re: closing matters; correspondence with purchaser re: closing matters.

**SWIFT HOTELS GROUP LTD.  
RECEIVER'S TIME SUMMARY  
INVOICE NO: 8001571030**

Date	Name	Hours	Total	Description
12/24/2020	Warga, Brent	1.3	617.50	Call with IHM; call with FCMC.
12/28/2020	Fritz, John	0.6	225.00	Sale closing matters and correspondence with IHM.
12/28/2020	Warga, Brent	0.4	190.00	Review of various e-mail correspondence.
12/29/2020	Fritz, John	0.9	337.50	Supplier notification of sale correspondence; revisions to form letter and correspondence to IHM.
12/29/2020	Warga, Brent	0.5	237.50	Review of e-mail correspondence to/from IHM; review of e-mail correspondence from C. King; review of service cancellation notice.
12/30/2020	Fritz, John	0.7	262.50	Correspondence with IHM and General Manager re: sale closing and operational matters.
1/4/2021	Dew, Todd	2.0	500.00	Processing of payables; trust accounting.
1/4/2021	Fritz, John	3.4	1,275.00	Correspondence and calls with counsel, purchaser, and primary secured creditor re: closing and purchaser's extension request; correspondence with General Manager and IHM re: closing and operational matters; review and request for supplier payments.
1/4/2021	Warga, Brent	1.7	807.50	Call with IHM and review of e-mail correspondence; call with MLT Aikins re: closing; call with purchaser re: extension of closing; review and signing of cheques.
1/5/2021	Dew, Todd	0.8	200.00	Processing of payables.
1/5/2021	Fritz, John	3.4	1,275.00	Call and correspondence with IHM; correspondence with counsel; call and correspondence with purchaser re: closing.
1/5/2021	Warga, Brent	2.2	1,045.00	Call with Innovation; call with purchaser; call with IHM; e-mail correspondence to IHM, purchaser, and legal counsel re: closing.
1/6/2021	Dew, Todd	0.8	200.00	Request reporting from C. King; trust accounting.
1/6/2021	Fritz, John	2.2	825.00	Call and correspondence with IHM and General Manager re: closing matters; correspondence with counsel re: closing documents and process.
1/6/2021	Warga, Brent	0.8	380.00	Review and execution of closing documents; review of various e-mail correspondence.
1/7/2021	Fritz, John	1.7	637.50	Correspondence with counsel, IHM, and General Manager re: closing matters; creditor enquiry.
1/7/2021	Warga, Brent	0.8	380.00	Various e-mail correspondence re: closing; updates to R&D.
1/8/2021	Dew, Todd	1.0	250.00	Processing of payables; trust accounting.
1/8/2021	Fritz, John	1.5	562.50	Review and request for supplier payments; direction to T. Dew re: closing matters; correspondence to counsel re: Statements of Claim; realtor closing correspondence.
1/8/2021	Warga, Brent	0.9	427.50	Review of various e-mail correspondence from realtor; review and signing of cheques; updates to R&D.
1/11/2021	Dew, Todd	2.0	500.00	Preparation of GST and PST returns; processing of payables; contact City of Swift Current and Saskenergy for final billings; emails to IHM with invoice copies.
1/11/2021	Fritz, John	2.7	1,012.50	Closing items; correspondence with IHM and former General Manager; supplier correspondence and account finalization.
1/12/2021	Fritz, John	2.2	825.00	Supplier closing matters and receivables collections; correspondence with IHM and former General Manager.
1/13/2021	Fritz, John	0.5	187.50	Correspondence with suppliers and IHM re: finalizing supplier accounts and receivables.
1/14/2021	Fritz, John	0.9	337.50	Review of supplier accounts; correspondence re: closing matters; review of GST and PST filings and request for payment.
1/15/2021	Dew, Todd	1.5	375.00	Letter to Receiver General for GST remittance; PST remittance; processing of payables.
1/15/2021	Warga, Brent	0.3	142.50	Review and signing of cheques.
1/17/2021	Warga, Brent	0.4	190.00	Review of bank details; updates to R&D.
1/18/2021	Dew, Todd	0.8	200.00	Trust accounting.
1/18/2021	Fritz, John	0.4	150.00	Correspondence with IHM and former General Manager re: receivable closing matters.
1/18/2021	Warga, Brent	0.4	190.00	Review and edits to affidavit materials re: statement of claim.
1/19/2021	Dew, Todd	1.5	375.00	Telephone call from CRA re: payroll and GST accounts; reconcile City of Swift Current final bills; provision of documents to IHM.
1/20/2021	Dew, Todd	1.3	325.00	File pre-Receiver GST returns; emails to C. King re: GST access code.
1/20/2021	Fritz, John	0.6	225.00	Correspondence with and direction to T. Dew re: supplier accounts.
1/20/2021	Warga, Brent	0.5	237.50	Video call with MLT Aikins to swear Affidavit re: litigation (Swift Hotels Swift Current Group Ltd.); review of Affidavit.
1/21/2021	Fritz, John	0.4	150.00	Correspondence with IHM re: financial reporting; review of outstanding financial reporting.
1/21/2021	Warga, Brent	0.4	190.00	E-mail correspondence with MLT Aikins and OWZW re: CRA's information request to review the prescribed security matters.
1/22/2021	Dew, Todd	1.0	250.00	Processing of payables; trust accounting; emails to/from IHM.
1/22/2021	Fritz, John	2.1	787.50	Correspondence with IHM and former General Manager re: closing matters; review and request for supplier payments; direction to T. Dew re: Supplier account closures.
<b>Total</b>		<b>113.9</b>	<b>\$ 42,535.00</b>	



**Invoice 8001794110**

**Deloitte Restructuring Inc.**

360 Main St  
Suite 2300  
Winnipeg MB R3C 3Z3

ATTN: Brad Appel  
Innovation Credit Union  
P.O. Box 1090 Stn Main  
Swift Current SK S9H 3X3  
Canada

Tel: (204) 942-0051  
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Date: May 05, 2021  
Client No.: 1143860  
WBS#: INN00170  
Engagement Partner: Brent Warga

GST Registration: 122893605RT0001

**For professional services rendered**

**Fees**

In accordance with the Receivership Order dated November 28, 2019.

Time incurred for the period January 23, 2021 to April 30, 2021.

B. Warga - Partner (13.0 hrs): 6,175.00  
J. Fritz - Senior Manager (30.5 hrs): 11,437.50  
T. Dew - Senior Consultant (26.9 hrs): 6,725.00  
L. Conorton - Technician (0.9 hrs): 90.00  
Total (71.3 hrs): 24,427.50

GST applicable 24,427.50

**Sales Tax**

GST at 5.00 % 1,221.38

**Total Amount Due (CAD) 25,648.88**

Accounts shall be due and payable when rendered. Interest shall be calculated at a simple daily rate of 0.0493% (equivalent to 18% per annum). Interest shall be charged and payable at this rate on any part of an account which remains unpaid from thirty(30) days after the invoice date to the date on which the entire account is paid.

**SWIFT HOTELS GROUP LTD.  
RECEIVER'S TIME SUMMARY  
INVOICE NO: 8001794110**

Date	Name	Hours	Total	Description
1/25/2021	Dew, Todd	2.0	\$ 500.00	Reconcile City of Swift Current invoices; trust accounting.
1/25/2021	Fritz, John	0.3	112.50	Direction to T. Dew re: supplier closing matters.
1/25/2021	Warga, Brent	0.7	332.50	Call with B. Appel; updates to R&D; coordination of repayment of Borrowing Facility.
1/26/2021	Dew, Todd	2.0	500.00	Pay City of Swift Current invoices; contact SaskEnergy, Coinamatic, Ecolab, and Meridian One-Cap for final bills and reporting.
1/26/2021	Fritz, John	1.2	450.00	Closing matters; direction to T. Dew re: supplier accounts; CRA enquiry; correspondence with former General Manager and IHM; correspondence with payroll supplier re: final employee reporting (T4, ROE, etc.).
1/27/2021	Fritz, John	1.4	525.00	Finalization of supplier accounts; direction to T. Dew re: account closures; review and authorization of supplier payments; primary secured creditor update matters.
1/27/2021	Warga, Brent	0.4	190.00	Updates to R&D; e-mail correspondence to B. Appel.
1/28/2021	Dew, Todd	1.0	250.00	Processing of payables; trust accounting.
1/28/2021	Fritz, John	2.1	787.50	Review of draft financial information and correspondence with IHM re: closing items; judgement review and correspondence with counsel.
1/28/2021	Warga, Brent	0.2	95.00	Review and signing of cheques.
1/29/2021	Fritz, John	0.5	187.50	Correspondence with IHM re: outstanding and closing matters.
2/1/2021	Dew, Todd	1.5	375.00	Telephone calls and emails re: final bills from suppliers, lease closures, and closing of accounts as at the sale date.
2/3/2021	Dew, Todd	1.0	250.00	Processing of payables; telephone calls to obtain final account billings.
2/4/2021	Dew, Todd	0.2	50.00	Trust accounting
2/4/2021	Fritz, John	2.0	750.00	Correspondence with IHM re: backup documentation; review and request for supplier payments; correspondence form General Manager re: closing items; compilation of closing account balances; finalize supplier accounts.
2/5/2021	Dew, Todd	0.5	125.00	Processing of payables.
2/5/2021	Warga, Brent	0.6	285.00	Review of bank details and updates to R&D; discussion with J. Fritz re: closing matters; review and signing of cheques.
2/8/2021	Fritz, John	1.7	637.50	Closing matters; review and reconciliation of post closing accounts between the Vendor and Purchaser re: A/R and post closing receipts; draft correspondence to former General Manager.
2/9/2021	Dew, Todd	1.0	250.00	Trust accounting; preparing PST and GST returns for January 2021.
2/9/2021	Fritz, John	0.9	337.50	Finalize post-closing accounts schedule and correspondence to former General Manager.
2/9/2021	Warga, Brent	0.8	380.00	Revisions to closing adjustment schedule for provision to Purchaser.
2/10/2021	Dew, Todd	1.0	250.00	CRA payroll audit matters.
2/10/2021	Fritz, John	1.4	525.00	Creditor enquiry; call with former General Manager re: closing accounts; direction to T. Dew re: supplier accounts; Realstar correspondence re: Wyndham account closing.
2/11/2021	Dew, Todd	1.0	250.00	Trust accounting.
2/11/2021	Fritz, John	1.5	562.50	Review and request for final supplier payments; correspondence with former General Manager re: closing accounts; supplier correspondence and direction to T. Dew re: supplier closing matters.
2/12/2021	Dew, Todd	1.5	375.00	Trust accounting; GST audit for November 2020; processing of payables.
2/12/2021	Fritz, John	0.4	150.00	Direction to T. Dew re: receipts and supplier account closure.
2/12/2021	Warga, Brent	0.3	142.50	Review and signing of cheques.
2/15/2021	Warga, Brent	0.4	190.00	Updates to R&D.
2/16/2021	Dew, Todd	1.0	250.00	GST audit; e-mails re: final invoices for Xerox.
2/17/2021	Dew, Todd	0.5	125.00	Amend and fax GST audit documents to CRA.
2/17/2021	Fritz, John	1.6	600.00	Correspondence with former General Manager re: closing matters; direction to T. Dew re: supplier payment request and account closures; GST audit documentation and payroll reporting matters.
2/18/2021	Dew, Todd	0.5	125.00	Trust accounting.
2/19/2021	Dew, Todd	0.5	125.00	Trust accounting; file PST and GST return for January 2021.
2/25/2021	Dew, Todd	0.3	75.00	Trust accounting; e-mails to SK WCB re: final refund and closure of account.
2/25/2021	Fritz, John	1.9	712.50	Closing matters; call supplier and confirm account closure; direction to T. Dew re: disbursements and outstanding closing matters and audit items; review of correspondence to primary secured creditor and provision of status update to B. Warga.
2/25/2021	Warga, Brent	0.8	380.00	Updates to R&D; draft e-mail correspondence to B. Appel.
2/26/2021	Dew, Todd	0.5	125.00	Trust accounting; telephone call to CRA re: GST and payroll audits.
2/26/2021	Warga, Brent	0.4	190.00	E-mail correspondence with B. Appel re: distribution; updates to R&D.
3/1/2021	Dew, Todd	0.8	200.00	Trust accounting; telephone calls to CRA re: payroll and GST audit and GST refunds.
3/1/2021	Warga, Brent	0.1	47.50	E-mail to B. Appel re: approval of interim payment.
3/3/2021	Fritz, John	0.6	225.00	Correspondence with counsel re: related party receivable Statements of Claim; review of Statements of Defence.
3/3/2021	Warga, Brent	0.4	190.00	Discussion with J. Fritz re: CEWS and eligibility; review of R&D.
3/4/2021	Dew, Todd	1.0	250.00	Trust accounting.
3/4/2021	Fritz, John	2.1	787.50	Correspondence with former General Manager re: trailing supplier accounts; compilation of status of outstanding matters and direction to T. Dew; request for final account payments; CRA enquiry; call with counsel re: related party Statements of Claim.
3/4/2021	Warga, Brent	0.3	142.50	Call with MLT Aikins re: statement of claim(s) and next steps.
3/5/2021	Dew, Todd	0.3	75.00	Trust accounting.
3/8/2021	Dew, Todd	0.5	125.00	GST filing; trust accounting
3/8/2021	Warga, Brent	0.7	332.50	Review and edits to e-mail correspondence to B. Appel re: statements of claim; discussion of same with J. Fritz.
3/9/2021	Dew, Todd	1.0	250.00	Review of pre-GST audit information from CRA; review GST audit for November 2020; telephone calls to GST auditor.
3/9/2021	Fritz, John	1.3	487.50	Review and compilation of information and draft points addressing Wyndham's third-party counsel enquiry; CRA enquiry and direction to T. Dew re: GST audit matters.
3/10/2021	Dew, Todd	1.0	250.00	Draft response to CRA re: RT0002 GST audit.
3/11/2021	Fritz, John	0.9	337.50	Closing matters; correspondence with former General Manager, counsel, and CRA.
3/12/2021	Dew, Todd	0.8	200.00	Phone calls and emails re: closing invoices; telephone calls and e-mails re: Moneris charges from account; trust accounting.
3/12/2021	Fritz, John	1.3	487.50	Call with Innovation Credit Union re: related party accounts; call with N. McGregor re: related party accounts and interplay with related Alberta corporations.
3/12/2021	Warga, Brent	1.0	475.00	Call with B. Appel re: statements of claim; call with J. Fritz to prepare for same; review and signing of cheques.
3/15/2021	Fritz, John	1.2	450.00	Call and follow-up correspondence with former operations consultant re: related party transactions and pre-receivership operations.
3/15/2021	Warga, Brent	0.6	285.00	Call with Praveen Joshi re: Ostrander and related entities (as requested by Innovation).

**SWIFT HOTELS GROUP LTD.  
RECEIVER'S TIME SUMMARY  
INVOICE NO: 8001794110**

Date	Name	Hours	Total	Description
3/17/2021	Warga, Brent	0.4	190.00	Review of position paper from MLT Aikins re: prescribed security interest; review of e-mail correspondence from CRA re: additional information required to determine their final position as to their priority claim.
3/18/2021	Fritz, John	1.9	712.50	Call with the Receiver's counsel re: status of CRA's deemed trust claim; direction to T. Dew re: finalizing the Receiver's accounts; correspondence with former General Manager re: payments received.
3/18/2021	Warga, Brent	1.1	522.50	Call with MLT Aikins re: prescribed security interest matter with CRA/Innovation; review of e-mail correspondence and position paper re: same.
3/19/2021	Dew, Todd	0.6	150.00	Trust accounting; Xerox closing invoice summary.
3/22/2021	Dew, Todd	0.3	75.00	Review outstanding items for closing; e-mails to Ecolab for prorated invoice.
3/23/2021	Dew, Todd	0.8	200.00	Telephone calls to CRA re: GST audits; review GST Notices of Assessment for RT0001 and RT0002.
3/24/2021	Fritz, John	0.9	337.50	Call and correspondence with former operations consultant re: related party transactions; direction to T. Dew re: CRA matters.
3/24/2021	Warga, Brent	0.6	285.00	Call with Praveen Josie re: related party A/R entities.
3/25/2021	Fritz, John	0.3	112.50	Direction to T. Dew re: supplier accounts, payables, and tax matters.
3/26/2021	Dew, Todd	1.0	250.00	E-mails to Ecolab re: closing of account; telephone calls to CRA re: payroll audits; e-mail to Push payroll re: 2021 T4's; trust accounting.
3/30/2021	Dew, Todd	1.0	250.00	Trust accounting; draft response to SK PST re: interest charges.
4/1/2021	Fritz, John	0.7	262.50	Correspondence with former operations manager re: rescheduled call and information requests; direction to T. Dew re: CRA matters.
4/5/2021	Conorton, Laura	0.5	50.00	Coordination and finalization of T2 for Swift Hotel Group Ltd.
4/5/2021	Dew, Todd	1.0	250.00	Prepare corporate income tax return.
4/5/2021	Warga, Brent	0.3	142.50	Review of corporate tax return.
4/6/2021	Dew, Todd	0.3	75.00	Trust accounting.
4/7/2021	Warga, Brent	0.3	142.50	E-mail correspondence with tax team e-filing October 2019 tax return.
4/8/2021	Warga, Brent	0.2	95.00	E-mail correspondence with T. Dew and tax group re: tax filing.
4/9/2021	Conorton, Laura	0.4	40.00	Trust accounting.
4/9/2021	Fritz, John	1.6	600.00	Review of pre-Receiver's tax return; confirm electronic filing procedure; completion of authorization documents and provision to tax professionals for filing.
4/9/2021	Warga, Brent	0.2	95.00	Review of T183 and e-mail correspondence with J. Fritz re: same.
4/12/2021	Dew, Todd	0.3	75.00	GST filing.
4/12/2021	Warga, Brent	0.3	142.50	Discussion with J. Fritz re: statements of claim and information requests from P. Joshi; finalization of tax filing.
4/13/2021	Fritz, John	0.2	75.00	Former operations manager correspondence re: information request follow-up.
4/14/2021	Fritz, John	0.6	225.00	Call and correspondence with former operations manager re: information requests.
4/14/2021	Warga, Brent	1.2	570.00	Call with P. Joshi re: related company assets; review of correspondence from OWZW re: priority dispute with CRA (prescribed security interest).
4/19/2021	Warga, Brent	0.2	95.00	Review of e-mail correspondence from T. Dew re: tax matters.
4/28/2021	Warga, Brent	0.5	237.50	Review and updates to R&D.
4/29/2021	Dew, Todd	0.2	50.00	Trust accounting.
<b>Total</b>		<b>71.3</b>	<b>\$ 24,427.50</b>	



**Invoice 8001968237**

**Deloitte Restructuring Inc.**

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Swift Current SK S9H 3X3  
Canada

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www.deloitte.ca

Date: July 23, 2021  
Client No.: 1143860  
WBS#: INN00170  
Engagement Partner: Brent Warga

GST Registration: 122893605RT0001

**For professional services rendered**

**Fees**

In accordance with the Receivership Order dated November 28, 2019.

Time incurred for the period May 1, 2021 to July 20, 2021

B. Warga - Partner (12.9 hrs): 6,127.50  
J. Fritz - Senior Manager (4.5 hrs): 1,687.50  
T. Dew - Senior Consultant (6.2 hrs): 1,550.00  
L. Conorton - Technician (1.2 hrs): 120.00  
Total (24.8 hrs): 9,485.00

**Sales Tax**

GST applicable 9,485.00

GST at 5.00 % 474.25

**Total Amount Due (CAD) 9,959.25**

Accounts shall be due and payable when rendered. Interest shall be calculated at a simple daily rate of 0.0493% (equivalent to 18% per annum). Interest shall be charged and payable at this rate on any part of an account which remains unpaid from thirty(30) days after the invoice date to the date on which the entire account is paid.

**SWIFT HOTELS GROUP LTD.  
RECEIVER'S TIME SUMMARY  
INVOICE NO: 8001968237**

Date	Name	Hours	Total	Description
5/5/2021	Warga, Brent	1.9	\$ 902.50	Drafting of Third Report.
5/6/2021	Conorton, Laura	0.4	40.00	Trust accounting.
5/6/2021	Fritz, John	1.4	525.00	Correspondence with T. Dew re: CRA matters; review and compilation of correspondence from counsel and incorporation into update to the primary secured creditor; updates to schedules for Innovation.
5/6/2021	Warga, Brent	1.4	665.00	Draft detailed update to B. Appel (related party A/R; CRA; R&D); updates to R&D.
5/7/2021	Dew, Todd	0.3	75.00	GST filing.
5/7/2021	Warga, Brent	0.3	142.50	E-mail correspondence to B. Appel; discussions with J. Fritz re: same.
5/10/2021	Dew, Todd	0.3	75.00	Trust accounting.
5/10/2021	Warga, Brent	0.1	47.50	E-mail correspondence with B. Appel.
5/11/2021	Dew, Todd	0.3	75.00	CRA update on payroll and GST audits.
5/12/2021	Fritz, John	0.6	225.00	Call with primary secured creditor re: file status update and plans to address remaining matters.
5/12/2021	Warga, Brent	1.1	522.50	Call with B. Appel and J. Schmidt re: file matters; drafting of Third Report.
5/13/2021	Fritz, John	0.9	337.50	Correspondence with Counsel re: judgement status and statement of claim matters.
5/20/2021	Dew, Todd	0.3	75.00	Trust accounting.
5/21/2021	Warga, Brent	1.4	665.00	Drafting report for summary judgment application re: Odyssey.
5/26/2021	Warga, Brent	1.1	522.50	Draft e-mail correspondence to MLT Aikins re: CRA priority matter and OWZW requests.
5/31/2021	Warga, Brent	0.2	95.00	Discussion with J. Fritz re: reporting.
6/2/2021	Dew, Todd	0.3	75.00	Trust accounting.
6/3/2021	Fritz, John	0.2	75.00	Correspondence from counsel and B. Warga re: Receiver's report edits.
6/4/2021	Fritz, John	0.3	112.50	Creditor telephone and email enquiry.
6/4/2021	Warga, Brent	0.3	142.50	Review of e-mail correspondence from MLT Aikins re: CRA priority matter.
6/7/2021	Conorton, Laura	0.4	40.00	Trust accounting.
6/7/2021	Fritz, John	0.9	337.50	Review of report in support of Summary Judgement.
6/7/2021	Warga, Brent	0.6	285.00	Review and updates to reporting for summary judgment against Odyssey.
6/8/2021	Dew, Todd	0.2	50.00	GST filing.
6/8/2021	Fritz, John	0.2	75.00	Finalize Receiver's Report re: Statement of Claim; correspondence with counsel re: same.
6/9/2021	Warga, Brent	0.8	380.00	Drafting of Third Report.
6/10/2021	Warga, Brent	1.4	665.00	Drafting of Third Report.
6/11/2021	Warga, Brent	0.2	95.00	Updates to R&D.
6/14/2021	Warga, Brent	0.3	142.50	Review of e-mail correspondence from OWZW re: CRA priority dispute.
6/29/2021	Warga, Brent	0.4	190.00	Review of e-mail correspondence from MLT Aikins re: CRA priority claim; responding to same.
6/30/2021	Warga, Brent	0.8	380.00	Review of CEWS letter correspondence; e-mail correspondence to/from MLT Aikins re: CRA/Innovation priority claim.
7/6/2021	Dew, Todd	0.3	75.00	Trust accounting.
7/6/2021	Warga, Brent	0.3	142.50	Review of e-mail correspondence from MLT Aikins re: CRA priority dispute.
7/13/2021	Conorton, Laura	0.4	40.00	Trust accounting.
7/13/2021	Dew, Todd	0.4	100.00	File GST return.
7/13/2021	Warga, Brent	0.1	47.50	Review and signing of cheques.
7/14/2021	Dew, Todd	0.3	75.00	GST filing.
7/15/2021	Dew, Todd	1.5	375.00	Prepare of corporate income tax returns.
7/15/2021	Warga, Brent	0.2	95.00	Discussions with J. Fritz re: file matters and tax filings.
7/20/2021	Dew, Todd	2.0	500.00	Preparation of corporate income tax returns.
<b>Total</b>		<b>24.8</b>	<b>\$ 9,485.00</b>	



**Invoice 8002113368**

**Deloitte Restructuring Inc.**

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www.deloitte.ca

Date: October 05, 2021  
Client No.: 1143860  
WBS#: INN00170  
Engagement Partner: Brent Warga  
GST Registration: 122893605RT0001

**For professional services rendered**

**Fees**

In accordance with the Receivership Order dated November 28, 2019.  
Time incurred for the period July 21, 2021 to September 30, 2021.

B. Warga - Partner (6.2 hrs): 2,945.00  
D. Crocker - Partner (0.5 hrs): 237.50  
G. Garland - Partner (0.2 hrs): 95.00  
J. Fritz - Senior Manager (13.9 hrs): 5,212.50  
T. Dew - Senior Consultant (4.9 hrs): 1,225.00  
L. Conorton - Technician (0.8 hrs): 80.00  
Total (26.5 hrs): 9,795.00

GST applicable 9,795.00

**Sales Tax**

GST at 5.00 % 489.75

**Total Amount Due (CAD) 10,284.75**

Accounts shall be due and payable when rendered. Interest shall be calculated at a simple daily rate of 0.0493% (equivalent to 18% per annum). Interest shall be charged and payable at this rate on any part of an account which remains unpaid from thirty(30) days after the invoice date to the date on which the entire account is paid.

**SWIFT HOTELS GROUP LTD.  
RECEIVER'S TIME SUMMARY  
INVOICE NO: 8002113368**

Date	Name	Hours	Total	Description
7/22/2021	Dew, Todd	0.3	\$ 75.00	Trust administration.
7/22/2021	Warga, Brent	0.7	332.50	Review of corporate tax returns and supporting details.
7/23/2021	Dew, Todd	0.3	75.00	Trust administration.
7/23/2021	Warga, Brent	0.6	285.00	E-mail correspondence with B. Appel; correspondence with T. Dew re: corporate taxes.
7/27/2021	Warga, Brent	0.2	95.00	Review of correspondence to/from legal counsel re: statement of claim against Odyssey.
7/28/2021	Fritz, John	1.9	712.50	Review of corporate tax filings and direction to T. Dew.
7/30/2021	Dew, Todd	0.5	125.00	Finalize income tax returns; e-mail tax department re: e-filing of tax returns.
8/6/2021	Dew, Todd	0.3	75.00	Trust administration.
8/9/2021	Fritz, John	0.7	262.50	Compilation of table and correspondence with counsel re: asset valuation enquiry.
8/9/2021	Warga, Brent	0.3	142.50	Review of e-mail correspondence re: CRA priority issue; review of correspondence to MLT Aikins re: same.
8/10/2021	Conorton, Laura	0.2	20.00	Trust accounting.
8/10/2021	Conorton, Laura	0.2	20.00	Trust accounting.
8/11/2021	Dew, Todd	0.4	100.00	GST filing.
8/11/2021	Fritz, John	2.6	975.00	Preparation for and attendance at Odyssey Summary Judgement hearing; update to B. Warga and call with counsel re: additional reporting for adjourned Odyssey Summary Judgement hearing.
8/11/2021	Warga, Brent	0.3	142.50	Discussion with MLT Aikins re: supplemental report (Odyssey summary judgment).
8/13/2021	Dew, Todd	1.0	250.00	Post receiver appointment income tax returns.
8/13/2021	Warga, Brent	0.3	142.50	Coordination for the e-filing of T2's.
8/16/2021	Dew, Todd	0.7	175.00	E-file T2 for Swift Hotels Group.
8/16/2021	Garland, Geoffrey	0.2	95.00	T2 e-filing.
8/18/2021	Fritz, John	0.5	187.50	Drafting Supplement to the Summary Judgement Report.
8/19/2021	Fritz, John	1.6	600.00	Drafting Supplement to the Summary Judgement Report; compilation of supporting documents; update and input from B. Warga.
8/19/2021	Warga, Brent	0.3	142.50	Review of e-mail correspondence to/from MLT Aikins re: CRA priority claim matter.
8/25/2021	Fritz, John	1.3	487.50	Drafting of Supplementary Odyssey report and appendices.
8/26/2021	Fritz, John	2.4	900.00	Compilation of Supplementary Report appendices and draft of Report.
8/26/2021	Warga, Brent	0.7	332.50	Review and edits to Supplementary Report re: Odyssey claim.
8/27/2021	Fritz, John	0.8	300.00	Finalize Draft Supplementary Report re: Odyssey Statement of Claim; circulate Draft Report to counsel.
8/30/2021	Fritz, John	1.1	412.50	Correspondence with Counsel re: Default Judgement; Draft Statutory (OSB 246(2)) Report; Update R&D.
8/30/2021	Warga, Brent	0.5	237.50	Review of BIA section 246(2) Reporting.
8/31/2021	Warga, Brent	0.2	95.00	Discussion with J. Fritz re: file matters and claims.
9/1/2021	Fritz, John	1.0	375.00	Finalize Supplemental Report and OSB Statutory Reporting.
9/1/2021	Warga, Brent	0.4	190.00	Review of supplemental report (re: Odyssey).
9/1/2021	Crocker, Darren	0.5	237.50	QAR Supplementary Report and Section 246 report.
9/2/2021	Dew, Todd	0.2	50.00	Fax S. 246 (2) report to OSB.
9/2/2021	Warga, Brent	1.1	522.50	Discussion with J. Fritz re: Supplemental Report; finalization of same.
9/3/2021	Dew, Todd	0.3	75.00	Trust administration.
9/7/2021	Dew, Todd	0.4	100.00	Trust administration; prepare wire transfer for payment to Innovation Credit Union.
9/7/2021	Warga, Brent	0.4	190.00	E-mail correspondence with B. Appel re: interim distribution; arranging for same; review of e-mail correspondence.
9/9/2021	Conorton, Laura	0.4	40.00	Trust accounting.
9/9/2021	Dew, Todd	0.3	75.00	Trust administration.
9/20/2021	Warga, Brent	0.2	95.00	Review e-mail correspondence re: Court hearing (Odyssey summary judgement).
9/23/2021	Dew, Todd	0.2	50.00	Telephone call to CRA re: outstanding GST refunds.
<b>Total</b>		<b>26.5</b>	<b>\$ 9,795.00</b>	

**Appendix G – Fees and Disbursements of the Receiver’s Legal Counsel**

SWIFT HOTELS GROUP LTD.

SUMMARY OF LEGAL FEES AND DISBURSEMENTS  
MLT AIKINS LLP

Date	Invoice #	Fees	Disbursements	GST	PST	Total	Hours
30-Nov-20	6167535	\$ 15,492	\$ 1,704	\$ 793	\$ 929	\$ 18,919	41.0
31-Dec-20	6173925	11,114	564	584	667	12,929	23.6
9-Feb-21	6185067	8,825	357	448	527	10,157	20.5
8-Mar-21	6191133	2,767	-	138	166	3,071	7.6
31-Mar-21	6195988	4,473	90	228	268	5,058	8.6
30-Apr-21	6202752	1,867	525	107	112	2,611	5.5
30-May-21	6209234	2,027	42	103	122	2,293	4.7
30-Jun-21	6216309	2,583	140	131	155	3,009	4.2
31-Jul-21	6223151	330	52	19	20	421	1.2
31-Aug-21	6227400	2,627	15	132	158	2,932	6.4
30-Sep-21	6233766	432	66	27	26	551	1.2
31-Oct-21	6241090	1,704	85	89	102	1,980	3.6
<b>Total</b>		<b>\$ 54,239</b>	<b>\$ 3,640</b>	<b>\$ 2,801</b>	<b>\$ 3,252</b>	<b>\$ 63,931</b>	<b>128.1</b>

November 30, 2020  
Invoice #6167535**INVOICE****Deloitte Restructuring Inc.**  
**2300, 360 Main Street**  
**Winnipeg, MB R3C 3Z3**  
**Brent Warga****TO PROFESSIONAL SERVICES RENDERED TO AND INCLUDING 11/30/20 AS FOLLOWS****RE: Swift Hotels Group Ltd.**  
**FILE: 0056074-00014**

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Nov 02/2020	JML	0.10	Reviewing correspondence from J. Fritz regarding status of proposed amendments to Asset Purchase Agreement
Nov 02/2020	RHH	0.20	Correspondence from and to J. Fritz
Nov 02/2020	KHW	2.20	Drafting Statements of Claim against Odyssey Hotels Groups Ltd., Ostrander Family Holdings Ltd., Ostrander Family Trust, and Swift Hotels Partnership Group Ltd.
Nov 02/2020	RHH	0.70	Reviewing email from B. Warga; attending to preparing amending agreement; email to client; reviewing email
Nov 03/2020	KHW	0.30	Drafting Statements of Claim for Odyssey Hotels Groups Ltd., Ostrander Family Holdings and Ostrander Family Trust, and Swift Hotels Group Partnership Ltd.
Nov 05/2020	AH	4.50	Preparing security opinion
Nov 05/2020	JDC	0.40	Searching Alberta Corporate Registry and Personal Property Registry
Nov 05/2020	JML	0.20	Reviewing correspondence from B. Warga regarding wire transfer of deposit and prepare reply correspondence and give instructions to inquire into same
Nov 05/2020	JML	0.10	Correspondence to B. Warga confirming receipt of \$600,000 deposit by wire transfer
Nov 05/2020	RFC	2.00	Searching Corporate Registry, Personal Property Registry, Bankruptcy and Insolvency, Bank Act, Judgment Registry, Queen's Bench (Swift Current, Regina, and Moose Jaw); obtaining City of Swift Current tax

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
			certificate
Nov 06/2020	RHH	1.00	Reviewing and revising draft Security Opinion
Nov 06/2020	AH	1.50	Reviewing security opinion
Nov 09/2020	AH	0.10	Finalizing security opinion
Nov 09/2020	JML	0.20	Reviewing correspondence from B. Warga regarding proposed dates for hearing of Sale Approval and Vesting Order application and review court calendar and prepare reply correspondence
Nov 09/2020	SEA	0.80	Telephone attendance on Supervisor with Alberta Corporate Registry regarding filing Articles of Revival, outstanding annual returns and Appointment of Receiver; telephone attendance on Supervisor obtaining instructions on appropriate filings
Nov 09/2020	JML	0.10	Reviewing status of application to revive corporation in Alberta Corporate Registry
Nov 09/2020	JML	0.40	Reviewing correspondence from B. Warga regarding instructions to schedule date for hearing of Sale Approval Application and prepare reply correspondence and follow up correspondence to Swift Current Local Registrar and follow up correspondence to B. Warga and J. Fritz
Nov 09/2020	JML	0.10	Reviewing status of revival of corporation at Alberta Corporations Branch
Nov 09/2020	RHH	0.40	Reviewing revised security opinion
Nov 09/2020	JML	1.40	Revising and circulating Draft Saskatchewan and Alberta Statements of Claim against related party companies
Nov 10/2020	AH	0.50	Finalizing security opinion
Nov 10/2020	JML	0.20	Reviewing correspondence from J. Fritz regarding proposed edits to Statement of Claim against Swift Hotels Swift Current Group Ltd. and give instructions to edit, issue and serve Statement of Claim
Nov 10/2020	KHW	0.70	Revising Statements of Claim to reflect Receiver's instructions; arranging to file claims at Alberta Court of Queen's Bench
Nov 10/2020	JML	0.30	Reviewing three Draft Alberta Statements of Claim and give instructions to edit, file and serve same on Defendants
Nov 10/2020	EMK	0.20	Revising Statement of Claim; arranging for issuance of Statement of Claim at Court of Queen's Bench

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Nov 10/2020	JML	0.10	Giving instructions to finalize, file and serve Alberta Statements of Claim
Nov 10/2020	JML	0.30	Reviewing Articles of Revival and giving instructions to file Receivership Order at Corporations Branch and prepare follow up correspondence to J. Fritz regarding same
Nov 10/2020	SEA	1.50	Attending to filing Articles of Revival including outstanding 2018, 2019 and 2020 annual returns and obtaining Proofs of Filing
Nov 10/2020	JML	0.20	Reviewing correspondence from J. Fritz regarding service of Statement of Claim on Ostrander Family Trust and prepare reply correspondence
Nov 12/2020	KHW	0.50	Revising Statement of Claim against Ostrander Family Trust
Nov 12/2020	EMK	0.10	Arranging for service of Statement of Claim by registered mail
Nov 12/2020	JML	0.20	Giving instructions to draft revised Statement of Claim
Nov 12/2020	JML	0.60	Revising draft security review opinion letter
Nov 12/2020	AH	0.20	Corresponding regarding security opinion; reviewing same
Nov 13/2020	JML	0.10	Attending to finalize security review opinion letter
Nov 13/2020	AH	0.20	Reviewing correspondence
Nov 13/2020	KHW	0.70	Revising Statement of Claim against Ostrander Family Trust and confirming designation of trustees in pleadings; submitting for filing
Nov 13/2020	JML	0.10	Attending to finalize security opinion letter
Nov 13/2020	JML	0.10	Attending to review and finalize Draft Statement of Claim against Ostrander Family Trust
Nov 14/2020	AH	0.20	Corresponding regarding security opinion
Nov 16/2020	JML	0.20	Reviewing correspondence from B. Warga regarding status of scheduling hearing of Receiver's application for Sale Approval & Vesting Order and prepare follow up correspondence to Swift Current Local Registrar and reply correspondence to B. Warga
Nov 16/2020	JML	0.10	Telephone attendance on N. Barlow regarding proposed hearing date for application for Sale Approval & Vesting Order
Nov 16/2020	JML	0.20	Correspondence to B. Warga and J. Fritz regarding December 18 hearing date for Receiver's Sale Approval and Vesting Order application
Nov 16/2020	JML	0.20	Giving instructions to prepare court application materials for December

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
			18 hearing
Nov 16/2020	JML	0.20	Correspondence to B. Warga regarding action plan for December 18 court application
Nov 16/2020	MC	0.10	Reviewing correspondence from B. Warga regarding application materials
Nov 16/2020	JML	0.10	Reviewing correspondence from B. Warga regarding December 18 SAVO application and prepare reply correspondence
Nov 19/2020	EMK	0.20	Correspondence to J. Fritz regarding issuance and service of Statement of Claim; reviewing correspondence from B. Warga regarding personal service of Statement of Claim; correspondence to B. Warga regarding the same
Nov 20/2020	EMK	0.10	Arranging for personal service of Statement of Claim on P. Krahn
Nov 20/2020	JML	0.20	Preparing summary of status of proposed hotel sale transaction
Nov 20/2020	AH	0.20	Reviewing correspondence
Nov 23/2020	MC	2.50	Reviewing correspondence from B. Warga regarding preparation of application materials; reviewing receivership order and security opinion; drafting sale approval and vesting order
Nov 23/2020	JML	0.30	Giving instructions to prepare and finalize Draft Distribution Order
Nov 23/2020	JML	0.30	Reviewing correspondence from B. Warga regarding proposed timing of assignment in bankruptcy and prepare detailed reply correspondence
Nov 23/2020	JML	0.80	Reviewing and consider proposed edits to security review letter and potential application to Registrar of Corporations to reinstate corporate debtor
Nov 23/2020	AH	0.90	Reviewing security opinion; attending on revival of corporation
Nov 24/2020	JML	0.10	Reviewing correspondence from B. Warga regarding proposed conference call with Innovation Credit Union and prepare reply correspondence
Nov 24/2020	JML	0.20	Giving instructions to effect revival of Swift Hotels Group Ltd. in Saskatchewan
Nov 24/2020	JML	0.20	Correspondence to J. Fritz regarding proposed edits to security review opinion to address questions raised by Receiver
Nov 24/2020	AH	0.50	Reviewing correspondence

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Nov 24/2020	JML	0.30	Revising and circulating final security opinion letter
Nov 25/2020	AH	0.80	Reviewing correspondence regarding security opinion
Nov 25/2020	JML	0.30	Reviewing correspondence from J. Fritz and revise and circulate security opinion letter
Nov 25/2020	JML	0.30	Telephone attendance on Innovation Credit Union, Receiver and counsel regarding status of pending transaction for sale of Hotel and related matters
Nov 25/2020	JML	0.10	Attending to schedule review of potential municipal property tax assessment appeal regarding Swift Current hotel
Nov 25/2020	NCH	0.80	Reviewing correspondence from B. Warga and J. Fritz; correspondence to B. Warga and J. Fritz; reviewing information card; reviewing publications regarding Swift Current assessment roll; telephone attendance on client conference call
Nov 25/2020	JML	0.40	Telephone attendance on B. Warga and J. Fritz regarding potential property tax assessment appeal
Nov 28/2020	MC	2.30	Reviewing receivership order and correspondence from B. Warga; drafting notice of application for sale approval and vesting order; reviewing and revising draft order
Nov 29/2020	MC	3.10	Drafting brief of law in support of sale approval and vesting order, distribution of sale proceeds, and confidentiality order; reviewing and revising notice of application and draft order
Nov 30/2020	MC	0.80	Reviewing and revising notice of application, draft sale approval and vesting order and brief of law
Nov 30/2020	PDO	0.10	Advising regarding distribution provision in vesting order
Nov 30/2020	KHW	0.30	Correspondence to Deloitte providing filed copies of Statements of Claim against Ostrander Family Holdings Ltd., Swift Hotels Partnership Group Ltd., and Odyssey Hotels Group Ltd.
Nov 30/2020	JML	0.10	Reviewing filed Alberta Statements of Claim and timeline for service of same on Defendants

**Total Fees: 15,491.50****SUMMARY OF PROFESSIONAL SERVICES**

	HOURS	HOURLY RATE	AMOUNT
Rebecca Cobbe	2.00	195.00	390.00
Sharon E. Andridge	2.30	210.00	483.00
Jennifer Crierie	0.40	215.00	86.00
Erica Klassen	0.60	235.00	141.00
Kaitlin H. Ward	4.70	250.00	1,175.00
Marek Coutu	8.80	250.00	2,200.00
Aaron Haight	9.60	250.00	2,400.00
Nicholas C. Horlick	0.80	330.00	264.00
Paul D. Olfert	0.10	375.00	37.50
Ryan H. Hallman	2.30	550.00	1,265.00
Jeffrey M. Lee	9.40	750.00	7,050.00
	<hr/> 41.00		<hr/> 15,491.50

## DISBURSEMENTS AND OTHER CHARGES

Imaging Services	24.75
Corporate Registry - Saskatoon	42.00
SK Provincial-Court of Queen's Bench	156.00
AB Court of Queen's Bench Fax Filing	9.00
Tax Certificate	25.00
ISC/Land Titles	16.00
Postage Meter	11.64
PPR Online - Saskatoon	40.00
Alberta PPR	12.00
Alberta Corporate Registry	14.00
Bankruptcy Search	24.00
	Total Taxable 374.39
SK Provincial-Court of Queen's Bench	300.00
AB Court of Queen's Bench Fax Filing	750.00
PPR Online - Regina	30.00
Alberta Corporate Registry	100.00
Alberta Corporate Registry	150.00

## DISBURSEMENTS AND OTHER CHARGES

Total Non-Taxable	1,330.00
<b>Sub-Total Disbursements:</b>	<b>1,704.39</b>

## BILL SUMMARY

Total Fees	15,491.50
GST	774.58
SK PST	929.49
Total Disbursements	1,704.39
GST	18.72
Subtotal	<u>18,918.67</u>

**TOTAL AMOUNT DUE CDN DOLLARS: \$ 18,918.67**

JML/ CRB

### **MLT Aikins LLP**

To the extent possible, we have made every effort to include fees and disbursements for the current billing period. In the event further fees or disbursements are incurred on your behalf, a subsequent account will be forwarded.

"Other Charges" are based on rates established by MLT AIKINS LLP and may change from time to time. A schedule of those rates is available on request.

### **TERMS: DUE UPON RECEIPT**

Interest at the rate of 14% per annum is added to all amounts overdue by 30 days or more.

December 31, 2020  
Invoice #6173925**INVOICE****Deloitte Restructuring Inc.**  
**2300, 360 Main Street**  
**Winnipeg, MB R3C 3Z3**  
**Brent Warga****TO PROFESSIONAL SERVICES RENDERED TO AND INCLUDING 12/30/20 AS FOLLOWS****RE: Swift Hotels Group Ltd.**  
**FILE: 0056074-00014**

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Dec 01/2020	MC	4.50	Reviewing the Second Report of the Receiver and the Confidential Supplement exhibits thereto; reviewing priority flip issue; reviewing and revising draft sale approval and vesting order, notice of application and brief of law
Dec 01/2020	KHW	0.40	Correspondence to Deloitte with filed copy of Statement of Claim against Brian Ostrander and Philip Krahn (personally and as trustees of Ostrander Family Trust); preparing to serve four Alberta Statements of Claim
Dec 01/2020	JML	0.20	Giving instructions to effect service of Statements of Claim
Dec 02/2020	JML	0.10	Reviewing correspondence from J. Fritz regarding service of Statement of Claim on corporate Defendants and prepare reply correspondence
Dec 02/2020	JML	0.10	Reviewing status of filing of evidence on behalf of Liquidator by December 7 deadline
Dec 02/2020	AH	0.20	Reviewing correspondence
Dec 02/2020	JML	1.50	Revising Draft Second Report of the Receiver and Draft Confidential Supplement to the Second Report of the Receiver and circulate same
Dec 02/2020	JML	0.10	Giving instructions to plan and prepare for closing of transaction
Dec 02/2020	KHW	0.60	Revising and finalizing service letter to serve Statements of Claim on Odyssey Hotels Group Ltd., Swift Hotels Partnership Group Ltd., Ostrander Family Holdings and Brian Ostrander and Phil Krahn in their own right and in their role as the Trustees of the Ostrander Family Trust

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Dec 02/2020	EMK	0.10	Correspondence to J. Fritz and B. Warga regarding service of Statement of Claim
Dec 02/2020	JML	0.10	Reviewing Notice of Assignment in Bankruptcy by Swift Hotels Group Ltd.
Dec 02/2020	JML	1.00	Revising and circulating draft materials in support of Receiver's December 18, 2020 court application for Sale Approval & Vesting Order
Dec 03/2020	JML	0.20	Reviewing correspondence from B. Warga regarding calculation of holdback and prepare reply correspondence
Dec 03/2020	JML	0.10	Giving instructions to finalize court application materials
Dec 03/2020	MC	1.70	Reviewing and revising notice of application, draft sale approval and vesting order and brief of law, and preparing list of authorities for same; reviewing correspondence from B. Warga on same
Dec 03/2020	JML	0.10	Correspondence to B. Warga regarding work plan to serve and file December 18 court application materials
Dec 03/2020	JML	0.10	Giving instructions to finalize court application materials and arrange for service and filing of same
Dec 03/2020	JML	0.20	Reviewing correspondence from B. Warga regarding Confidential Supplement and prepare reply correspondence regarding same
Dec 04/2020	JML	0.20	Reviewing correspondence from B. Warga regarding Confidential Supplement to Second Report of the receiver and prepare reply correspondence and follow up correspondence to R. Sandbeck and S. Joyce
Dec 04/2020	JML	0.10	Reviewing correspondence from S. Joyce regarding Innovation Credit Union undertaking to maintain confidentiality in regard to Confidential Supplement to Second Report of the Receiver
Dec 04/2020	MC	0.40	Reviewing correspondence from B. Warga regarding Second Report of the Receiver and Confidential Supplement; correspondence to B. Warga on same; attending to service of application materials
Dec 04/2020	JML	0.10	Reviewing status of service of Second Receiver's Report and ancillary materials
Dec 07/2020	JML	0.10	Reviewing correspondence from S. Joyce regarding Innovation Credit Union review of Confidential Supplement to Second Report of Receiver and prepare reply correspondence
Dec 07/2020	SEA	0.50	Reviewing correspondence from T. Cherian regarding adding Receiver;

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
			attending to filing addition of new Receiver in care of Winnipeg location; and attending to filing Appointment of Receiver for Swift Hotels Group Ltd. with Alberta Corporate Registry and obtaining Proof of Filing
Dec 07/2020	MC	0.70	Attending to publication ban request and obtaining proof of compliance with practice directive #3; drafting correspondence to Court of Queen's Bench Registrar for filing of materials
Dec 08/2020	MC	0.30	Attending to filing of application materials
Dec 09/2020	EMK	0.40	Reviewing issues regarding noting for default; correspondence to J. Fritz regarding timeline for noting defendant for default
Dec 09/2020	JML	0.20	Reviewing status of service of debt action Claim on Saskatchewan Defendant and opportunity to note for default and give instructions accordingly
Dec 14/2020	JML	0.20	Reviewing correspondence from J. Sheward regarding nominee corporation and prepare reply correspondence regarding nominee corporation and adequacy of Draft Sale Approval and Vesting Order
Dec 15/2020	AH	0.30	Reviewing correspondence
Dec 15/2020	RHH	0.30	Correspondence to and from counsel for the purchaser
Dec 15/2020	JML	0.10	Reviewing closing mechanics regarding Receiver's certificate
Dec 15/2020	JML	0.20	Correspondence to J. Sheward requesting confirmation that draft Sale Approval and Vesting Order are satisfactory
Dec 16/2020	JML	0.10	Reviewing correspondence from J. Sheward regarding Purchaser approval of Sale Approval and Vesting Order and prepare reply correspondence
Dec 16/2020	JML	0.40	Reviewing correspondence from D. Smith regarding CRA deemed trust claim for unpaid GST and prepare detailed reply correspondence and follow up correspondence to B. Warga and J. Fritz
Dec 17/2020	JML	0.20	Reviewing correspondence from B. Warga regarding calculation of potential Receiver's holdback from sale proceeds and prepare reply correspondence
Dec 17/2020	JML	0.10	Telephone attendance on D. Smith regarding December 18 Hearing
Dec 17/2020	MC	1.90	Reviewing tax arrears priority issue; reviewing Income Tax Act and Regulations, and jurisprudence on same; preparing summary of conclusions; telephone attendance with J. Fritz and B. Warga regarding amending distribution order

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Dec 17/2020	JML	0.40	Reviewing materials and prepare for December 18 court application
Dec 17/2020	JML	0.70	Reviewing proposed edits to Distribution Order and telephone B. Warga and J. Fritz to discuss same and prepare and circulate revised Distribution Order
Dec 18/2020	MC	0.20	Telephone attendance with J. Fritz, B. Warga, S. Joyce and D. Smith regarding revisions to distribution order
Dec 18/2020	JML	1.70	Preparing oral submissions for December 18 application by Receiver and telephone counsel to discuss modified Order and prepare for and attend court application before Mr. Justice Smith to obtain modified Sale Approval and Vesting Order
Dec 18/2020	JML	0.40	Revising Sale Approval and Vesting Order to reflect nominee of the Purchaser and prepare and circulate correspondence to Local Registrar of Judicial Centre of Swift Current
Dec 18/2020	JML	0.20	Giving instructions to serve Sale Approval and Vesting Order on the Service List and file Affidavit of Service at Swift Current QB
Dec 18/2020	JML	0.20	Attending to circulate Sale Approval and Vesting Order and give instructions to move transaction forward to closing
Dec 18/2020	JML	0.10	Reviewing correspondence from R. Brunsdon regarding request for copy of Offer to Purchase and Appraisal and prepare reply correspondence regarding same
Dec 20/2020	RHH	0.20	Reviewing order and closing matters
Dec 21/2020	AH	0.10	Reviewing correspondence
Dec 21/2020	RHH	0.40	Reviewing email from purchaser's counsel; email to purchaser's counsel; considering issues for closing
Dec 22/2020	JML	0.20	Reviewing correspondence from B. Warga regarding Notice to Terminate Independent Contractor arrangement and prepare follow up correspondence
Dec 23/2020	BMM	0.50	Reviewing independent contractor agreement issues
Dec 23/2020	JML	0.10	Reviewing correspondence from B. Warga regarding independent contractor termination notices and prepare reply correspondence
Dec 29/2020	EMK	0.10	Attending to filing Affidavit of Service and noting defendant for default of defence

**Date                      Initials                      Hours                      Narrative**

**Total Fees:                      11,113.50**

**SUMMARY OF PROFESSIONAL SERVICES**

	<b>HOURS</b>	<b>HOURLY RATE</b>	<b>AMOUNT</b>
Sharon E. Andridge	0.50	210.00	105.00
Erica Klassen	0.60	235.00	141.00
Kaitlin H. Ward	1.00	250.00	250.00
Marek Coutu	9.70	250.00	2,425.00
Aaron Haight	0.60	250.00	150.00
Brent M. Matkowski	0.50	395.00	197.50
Ryan H. Hallman	0.90	550.00	495.00
Jeffrey M. Lee	9.80	750.00	7,350.00
	23.60		11,113.50

**DISBURSEMENTS AND OTHER CHARGES**

Imaging Services	208.75
Online Bank of Canada	32.00
Computerized Legal Research - WestlaweCarswell	135.00
Postage Meter	66.06
Alberta Corporate Registry	7.00
Process Server - VENDOR: Lormit Management Systems Inc.; INVOICE#: CAV154806; DATE: 11/30/2020 - Payment of Lormit Inv #CAV154806 Nov 30/20	115.60
Total Taxable	564.41

**Sub-Total Disbursements:                      564.41**

**BILL SUMMARY**

Total Fees	11,113.50
GST	555.68
SK PST	666.81
Total Disbursements	564.41
GST	28.23
Subtotal	12,928.62

**TOTAL AMOUNT DUE CDN DOLLARS:                      \$    12,928.62**

JML/ CRB

**MLT Aikins LLP**

To the extent possible, we have made every effort to include fees and disbursements for the current billing period. In the event further fees or disbursements are incurred on your behalf, a subsequent account will be forwarded.

"Other Charges" are based on rates established by MLT AIKINS LLP and may change from time to time. A schedule of those rates is available on request.

**TERMS: DUE UPON RECEIPT**

Interest at the rate of 14% per annum is added to all amounts overdue by 30 days or more.

February 9, 2021  
Invoice #6185067**INVOICE****Deloitte Restructuring Inc.**  
**2300, 360 Main Street**  
**Winnipeg, MB R3C 3Z3**  
**Brent Warga****TO PROFESSIONAL SERVICES RENDERED TO AND INCLUDING 01/31/21 AS FOLLOWS****RE: Swift Hotels Group Ltd.**  
**FILE: 0056074-00014**

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Jan 04/2021	AH	2.20	Drafting trust letter
Jan 04/2021	RHH	1.80	Reviewing closing documents and draft closing letter; reviewing email form client; telephone attendance on J. Sheward; reviewing closing issues and timeline; telephone attendance on clients; telephone attendance on J. Sheward; email to clients
Jan 04/2021	JML	0.10	Reviewing correspondence from Purchaser's counsel regarding status of closing
Jan 05/2021	AH	0.30	Reviewing status of scheduled closing
Jan 05/2021	RHH	0.70	Reviewing information from J. Fritz; reviewing email from B. Warga; email to J. Sheward; various emails form and to J. Sheward; preparing for closing
Jan 06/2021	RHH	1.40	Attending to all matters related to preparing for closing
Jan 06/2021	AH	1.50	Preparing closing documents; corresponding regarding same
Jan 06/2021	KHW	0.40	Providing instructions to prepare Affidavits of Service and to effect service on individual trustees of Ostrander Family Trust
Jan 07/2021	AH	0.30	Reviewing correspondence regarding closing
Jan 07/2021	JML	0.50	Reviewing correspondence from D. Smith regarding particulars of CRA deemed trust claim and prepare priority analysis and proposed detailed draft correspondence to counsel for CRA regarding next steps to release holdback

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Jan 07/2021	JML	0.20	Reviewing correspondence from B. Warga regarding proposed correspondence to counsel for CRA and prepare reply correspondence and follow up correspondence to D. Smith
Jan 07/2021	JML	0.20	Giving instructions to close transaction
Jan 07/2021	JML	0.10	Reviewing correspondence from D. Smith and prepare reply correspondence
Jan 07/2021	RHH	1.00	Attending to closing sale transaction
Jan 08/2021	KHW	0.40	Providing update on status of service on Ostrander Family Holdings Ltd., Ostrander Family Trust, Swift Hotels Partnership Group and Odyssey Hotels Group Ltd.
Jan 09/2021	EMK	0.10	Correspondence to J. Fritz regarding noting for default
Jan 12/2021	KHW	0.90	Coordinating service on group of Alberta defendants as a result of returned documents
Jan 12/2021	JML	0.10	Giving instructions to effect personal service of Statements of Claim on corporate directors
Jan 12/2021	AH	0.10	Reviewing correspondence regarding discharge of tax lien
Jan 12/2021	JML	0.20	Reviewing status of closing and issues regarding City of Swift Current tax lien
Jan 13/2021	AH	0.10	Reviewing correspondence regarding Swift Current property taxes
Jan 13/2021	MC	0.20	Reviewing discharge of property tax lien issue regarding the City of Swift Current
Jan 13/2021	RHH	0.60	Reviewing tax lien issues; telephone attendance on M. Walter; email to M. Walter; email to J. Sheward
Jan 13/2021	KHW	0.30	Reviewing service letters to be sent via process server
Jan 14/2021	RHH	0.30	Reviewing discharge of tax lien matters; email from and to M. Walter; email to and from J. Sheward
Jan 14/2021	AH	0.10	Reviewing correspondence regarding tax lien
Jan 15/2021	EMK	0.60	Preparing draft Default Judgment and Affidavit for Default Judgment on a Debt or Liquidated Demand
Jan 18/2021	EMK	0.90	Reviewing issues regarding calculation of pre-judgment interest; further preparing draft Form of Default Judgment and Affidavit for Default

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
			Judgment on a Debt or Liquidated Demand; correspondence to J. Fritz and B. Warga regarding the same
Jan 18/2021	JML	0.10	Giving instructions to calculate pre-judgment interest from date of first demand
Jan 20/2021	RHH	0.50	Reviewing post-closing matters; preparing statement of funds; email to client
Jan 20/2021	AH	0.10	Reviewing correspondence regarding payout of sale proceeds
Jan 20/2021	EMK	0.20	Telephone attendance on B. Warga remote execution of Affidavit for Default Judgment on a Debt or Liquidated Demand; preparing Affidavit for Default Judgment on a Debt or Liquidated Demand and Declaration of Lawyer who has Witnessed Documents by Electronic Means
Jan 21/2021	JML	0.20	Reviewing correspondence from D. Smith and prepare reply correspondence and prepare follow up correspondence to B. Warga and J. Fritz
Jan 21/2021	RHH	0.80	Attending to all post-closing matters related to paying out tax lien and disbursing balance of funds; telephone attendance on client; email from and to M. Walter
Jan 21/2021	JML	0.10	Reviewing correspondence from B. Warga to counsel for Innovation Credit Union regarding inquiries from counsel for Canada Revenue Agency
Jan 21/2021	EMK	0.10	Arranging for filing of Affidavit for Default Judgment and Draft Default Judgment
Jan 27/2021	KHW	0.20	Reviewing correspondence from P. Higgerty, counsel to Odyssey Hotels, Swift Hotels Partnership Group, and Ostrander Family Trust
Jan 28/2021	KHW	1.30	Preparing correspondence to counsel for P. Krahn, B. Ostrander and their companies regarding an extension to file a Statement of Defence; providing update email to Deloitte
Jan 28/2021	SMJ	0.10	Registering judgment in judgment registry
Jan 28/2021	EMK	0.20	Arranging for registration of default judgment; correspondence to J. Fritz and B. Warga regarding issuance and registration of default judgment
Jan 29/2021	EMK	0.10	Reviewing personal property registry and land titles registry search results
Jan 29/2021	RFC	0.20	Searching SK Personal Property Registry (x1)

Date	Initials	Hours	Narrative
Jan 29/2021	KHW	0.60	Correspondence to P. Higgerty regarding service of Statements of Claim on Philip Krahn and Brian Ostrander et al
Jan 29/2021	JML	0.10	Reviewing status of service of Alberta Statements of Claim

**Total Fees: 8,824.50**

**SUMMARY OF PROFESSIONAL SERVICES**

	HOURS	HOURLY RATE	AMOUNT
Sandra M. Janzen	0.10	205.00	20.50
Rebecca Cobbe	0.20	205.00	41.00
Erica Klassen	2.20	270.00	594.00
Kaitlin H. Ward	4.10	275.00	1,127.50
Marek Coutu	0.20	285.00	57.00
Aaron Haight	4.70	285.00	1,339.50
Ryan H. Hallman	7.10	585.00	4,153.50
Jeffrey M. Lee	1.90	785.00	1,491.50
	<u>20.50</u>		<u>8,824.50</u>

**DISBURSEMENTS AND OTHER CHARGES**

Deliveries	17.69
Imaging Services	81.25
PPR Online - Saskatoon	10.00
Alberta Corporate Registry	21.00
Agent's Account - VENDOR: Equifax; INVOICE#: 6150482; DATE: 12/31/2020 - Consumer reports	46.20
	<b>Total Taxable 176.14</b>
SK Provincial-Court of Queen's Bench	50.00
PPR Online - Saskatoon	11.00
CIBC Bank Service Fee - EFT/Wire - Wire fee for outgoing wire sent to Deloitte Restructuring Inc. Receiver of Swift Hotels Group Ltd. - Jan 21/21	120.00
	<b>Total Non-Taxable 181.00</b>
	<b>Sub-Total Disbursements: 357.14</b>

## **BILL SUMMARY**

Total Fees	8,824.50
GST	439.18
SK PST	527.01
Total Disbursements	357.14
GST	8.81
Subtotal	<u>10,156.63</u>
<b>TOTAL AMOUNT DUE CDN DOLLARS:</b>	<b>\$ <u>10,156.63</u></b>

JML/ CRB

### **MLT Aikins LLP**

To the extent possible, we have made every effort to include fees and disbursements for the current billing period. In the event further fees or disbursements are incurred on your behalf, a subsequent account will be forwarded.

"Other Charges" are based on rates established by MLT AIKINS LLP and may change from time to time. A schedule of those rates is available on request.

### **TERMS: DUE UPON RECEIPT**

Interest at the rate of 14% per annum is added to all amounts overdue by 30 days or more.

March 8, 2021  
Invoice #6191133**INVOICE****Deloitte Restructuring Inc.**  
**2300, 360 Main Street**  
**Winnipeg, MB R3C 3Z3**  
**Brent Warga****TO PROFESSIONAL SERVICES RENDERED TO AND INCLUDING 02/28/21 AS FOLLOWS****RE: Swift Hotels Group Ltd.**  
**FILE: 0056074-00014**

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Feb 01/2021	JML	0.20	Reviewing correspondence from D. Smith and prepare reply correspondence and follow up correspondence to B. Warga and J. Fritz
Feb 02/2021	KHW	0.10	Following up on service of documents on Philip Krahn and Brian Ostrander; requesting Affidavit of Service from process server
Feb 04/2021	KHW	0.70	Reviewing correspondence from opposing counsel regarding his potential retainer for Defendants; confirming requirements for filing Default Judgment
Feb 04/2021	PDO	0.20	Advising regarding procedural matters
Feb 05/2021	KHW	0.30	Correspondence to W. Langen regarding request not to Note in Default
Feb 05/2021	PDO	0.30	Advising regarding procedural matters; telephone attendance on prospective debtor counsel
Feb 05/2021	EMK	0.20	Reviewing issues regarding judgment enforcement
Feb 08/2021	JML	0.20	Reviewing correspondence from counsel to Innovation Credit Union regarding deemed security interest and prepare reply correspondence, follow up correspondence to D. Smith and follow up correspondence to B. Warga
Feb 10/2021	EMK	0.50	Reviewing issues regarding judgment enforcement; correspondence to J. Fritz regarding options for judgment enforcement
Feb 10/2021	JML	0.10	Reviewing status of judgment enforcement
Feb 10/2021	KHW	0.20	Reviewing and revising Default Judgment against entities controlled by

Date	Initials	Hours	Narrative
			Philip Krahn
Feb 11/2021	KHW	0.60	Correspondence to W. Langen confirming if he was retained by debtors; correspondence to T. Crawford regarding his retainer by Defendants and deadline for filing SOD
Feb 11/2021	JML	0.20	Reviewing correspondence from N. Packett regarding claim and prepare follow up correspondence to B. Warga and J. Fritz
Feb 16/2021	KHW	0.10	Call with counsel for Philip Krahn and Brian Ostrander regarding his instructions to file Statement of Defence
Feb 22/2021	JML	0.20	Reviewing correspondence from B. Warga regarding Innovation Credit Union inquiry as to position of CRA and prepare follow up correspondence to D. Smith and follow up correspondence to B. Warga
Feb 23/2021	MC	0.30	Reviewing correspondence from D. Smith regarding priority of CRA source deduction arrears; reviewing Income Tax Regulations on same
Feb 23/2021	JML	0.20	Giving instructions to review and research Regulation 2201(2) of the Income Tax Act regarding extent of duty of marshalling as it pertains to guarantees
Feb 24/2021	KHW	0.10	Phone call with Tom Taylor, counsel for P. Khran, B. Ostrander et al, regarding status of Statements of Defence
Feb 26/2021	MC	0.90	Reviewing the priority of prescribed security interests under the Income Tax Regulations; reviewing case authorities on same; preparing summary of conclusions on priority
Feb 27/2021	MC	2.00	Researching the treatment of, and commentary on, prescribed security interests under the Income Tax Regulations; reviewing correspondence from Innovation Credit Union on same; drafting memorandum on the priority of prescribed security interests

**Total Fees: 2,767.00**

**SUMMARY OF PROFESSIONAL SERVICES**

	HOURS	HOURLY RATE	AMOUNT
Erica Klassen	0.70	270.00	189.00
Kaitlin H. Ward	2.10	275.00	577.50
Marek Coutu	3.20	285.00	912.00
Paul D. Olfert	0.50	450.00	225.00
Jeffrey M. Lee	1.10	785.00	863.50
	<u>7.60</u>		<u>2,767.00</u>

## **BILL SUMMARY**

Total Fees	2,767.00
GST	138.35
SK PST	166.02
Total Disbursements	0.00
Subtotal	<u>3,071.37</u>
<b>TOTAL AMOUNT DUE CDN DOLLARS:</b>	<b>\$ <u>3,071.37</u></b>

JML/ CRB

### **MLT Aikins LLP**

To the extent possible, we have made every effort to include fees and disbursements for the current billing period. In the event further fees or disbursements are incurred on your behalf, a subsequent account will be forwarded.

"Other Charges" are based on rates established by MLT AIKINS LLP and may change from time to time. A schedule of those rates is available on request.

### **TERMS: DUE UPON RECEIPT**

Interest at the rate of 14% per annum is added to all amounts overdue by 30 days or more.

**INVOICE**

**Deloitte Restructuring Inc.**  
**2300, 360 Main Street**  
**Winnipeg, MB R3C 3Z3**  
**Brent Warga**

**TO PROFESSIONAL SERVICES RENDERED TO AND INCLUDING 03/31/21 AS FOLLOWS**

**RE: Swift Hotels Group Ltd.**  
**FILE: 0056074-00014**

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Mar 03/2021	KHW	0.80	Correspondence to T. Taylor, counsel for P. Krahn and B. Ostrander et al requesting confirmation of service in writing of the Statement of Claim against Ostrander Family Holdings Ltd.; providing update email to Deloitte on next steps for defendants who have filed a Statement of Defence
Mar 03/2021	JML	0.10	Reviewing Statements of Defence filed by Alberta Defendants
Mar 03/2021	JML	0.10	Reviewing potential next steps in regard to Alberta Statements of Defence
Mar 04/2021	KHW	0.90	Preparing for and meeting with J. Fritz and B. Warga regarding pursuing summary judgment against defendants who filed Statements of Defence
Mar 04/2021	JML	0.50	Telephone attendance on B. Warga and J. Fritz regarding potential next steps regarding defended Alberta debt actions
Mar 04/2021	RHH	0.20	Correspondence to and from purchaser's counsel regarding status of PST form
Mar 09/2021	JML	0.20	Reviewing correspondence from D. Catuogno regarding status of receivership and prepare reply correspondence
Mar 09/2021	JML	0.50	Reviewing correspondence from D. Catuogno and J. Fritz and prepare detailed reply correspondence to D. Catuogno
Mar 09/2021	JML	0.10	Reviewing correspondence from D. Catuogno regarding closing date and Purchaser's counsel and prepare reply correspondence

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Mar 12/2021	JML	0.20	Reviewing research regarding prescribed security interests under the Income Tax Act
Mar 12/2021	JML	0.20	Reviewing and refining analysis of prescribed security interest in the Income Tax Act Regulations
Mar 14/2021	RHH	0.20	Correspondence to and from purchaser's counsel
Mar 15/2021	MC	1.20	Reviewing and revising memorandum regarding the priority of prescribed security interests
Mar 17/2021	JML	0.40	Correspondence to B. Warga and J. Fritz regarding CRA position on prescribed security interest and requesting conference call to discuss same
Mar 17/2021	JML	0.10	Reviewing correspondence from B. Warga regarding proposed conference call and giving instructions to schedule same
Mar 17/2021	MC	0.30	Reviewing memorandum regarding prescribed security interests and correspondence on same; correspondence to J. Fritz and B. Warga regarding call to discuss same
Mar 18/2021	MC	0.40	Telephone attendance with B. Warga and J. Fritz regarding prescribed security interests issue; reviewing correspondence to counsel for Innovation Credit Union on same
Mar 18/2021	JML	0.30	Telephone attendance on B. Warga and J. Fritz regarding status of priority dispute between Canada Revenue Agency and Innovation Credit Union and potential next steps
Mar 18/2021	JML	0.20	Correspondence to R. Sandbeck and S. Joyce regarding proposed call to discuss priority dispute between Innovation Credit Union and Canada Revenue Agency
Mar 18/2021	JML	0.10	Reviewing correspondence from S. Joyce and attending to schedule conference call to discuss prescribed security interest issue
Mar 19/2021	MC	0.50	Telephone attendance with counsel for Innovation Credit Union regarding issues for prescribed security interest priority dispute
Mar 19/2021	JML	0.30	Telephone attendance on R. Sandbeck and S. Joyce regarding position of Canada Revenue Agency on deemed trust and potential next steps
Mar 19/2021	JML	0.30	Correspondence to R. Sandbeck and S. Joyce regarding status of priority dispute between CRA and Innovation Credit Union and prepare follow up correspondence to B. Warga and J. Fritz
Mar 23/2021	RHH	0.20	Correspondence to and from purchaser's counsel

Date	Initials	Hours	Narrative
Mar 30/2021	KHW	0.10	Correspondence to T. Taylor following up on whether he accepts service of Statement of Claim filed against Ostrander Holdings Ltd.; reattempting service on Ostrander Holdings Ltd.
Mar 31/2021	RHH	0.20	Reviewing executed Business Acquisition Declaration; email to J. Fritz
			<b>Total Fees: 4,473.00</b>

**SUMMARY OF PROFESSIONAL SERVICES**

	HOURS	HOURLY RATE	AMOUNT
Kaitlin H. Ward	1.80	275.00	495.00
Marek Coutu	2.40	285.00	684.00
Ryan H. Hallman	0.80	585.00	468.00
Jeffrey M. Lee	3.60	785.00	2,826.00
	8.60		4,473.00

**DISBURSEMENTS AND OTHER CHARGES**

Imaging Services	1.50
ESC - Standard Searches - ESC Due Diligence Searches	76.00
Total Taxable	77.50
ESC - Standard Searches - ESC Due Diligence Searches	12.00
Total Non-Taxable	12.00
<b>Sub-Total Disbursements:</b>	<b>89.50</b>

**BILL SUMMARY**

Total Fees	4,473.00
GST	223.65
SK PST	268.38
Total Disbursements	89.50
GST	3.88
Subtotal	5,058.41
<b>TOTAL AMOUNT DUE CDN DOLLARS:</b>	<b>\$ 5,058.41</b>

## MLT Aikins LLP

To the extent possible, we have made every effort to include fees and disbursements for the current billing period. In the event further fees or disbursements are incurred on your behalf, a subsequent account will be forwarded.

"Other Charges" are based on rates established by MLT AIKINS LLP and may change from time to time. A schedule of those rates is available on request.

### **TERMS: DUE UPON RECEIPT**

Interest at the rate of 14% per annum is added to all amounts overdue by 30 days or more.

April 30, 2021  
Invoice #6202752**INVOICE****Deloitte Restructuring Inc.**  
**2300, 360 Main Street**  
**Winnipeg, MB R3C 3Z3**  
**Brent Warga****TO PROFESSIONAL SERVICES RENDERED TO AND INCLUDING 04/30/21 AS FOLLOWS****RE: Swift Hotels Group Ltd.**  
**FILE: 0056074-00014**

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Apr 13/2021	KHW	0.10	Reviewing correspondence from S. Joyce, counsel for Innovation Credit Union, regarding judgments against P. Krahn, B. Ostrander and Ostrander Family Holdings
Apr 13/2021	JML	0.50	Reviewing correspondence from S. Joyce and prepare detailed follow up correspondence to B. Warga and J. Fritz and giving instructions to gather information regarding debtors
Apr 14/2021	MC	0.70	Reviewing correspondence from counsel for Innovation Credit Union regarding mortgage priority, and statements of affairs for B. Ostrander; attending to due diligence search results regarding properties listed in statement of affairs; correspondence to B. Warga and J. Fritz regarding same
Apr 14/2021	RFC	0.40	Searching ISC land titles (x2); obtaining City of Saskatoon tax summary
Apr 19/2021	MC	0.20	Reviewing proposed revisions to BMO security opinion and correspondence on same
Apr 19/2021	KHW	0.40	Preparing materials for Default Judgment against Ostrander Family Holdings; reviewing Consumer Proposal filed by P. Krahn
Apr 20/2021	KHW	0.50	Preparing Default Judgment against Ostrander Family Holdings Ltd.
Apr 21/2021	KHW	0.20	Arranging to file Default Judgment and Affidavits in support
Apr 22/2021	KHW	0.50	Contacting Proposal Trustee of P. Krahn to request creditor package; contacting legal counsel for Innovation Credit Union to request further details of the Credit Union's judgments against P. Krahn, B. Ostrander, and Ostrander Family Holdings Ltd.

Date	Initials	Hours	Narrative
Apr 23/2021	KHW	0.40	Correspondence to Proposal Trustee of P. Krahn obtaining creditor package; correspondence to Alberta agent for Innovation Credit Union requesting further details of enforcement efforts
Apr 23/2021	JML	0.10	Reviewing Proposal to Creditors by P. Krahn and related documentation
Apr 28/2021	KHW	0.40	Reviewing application to validate service and obtain default judgment against Ostrander Family Holdings
Apr 28/2021	TS	0.30	Searching Calgary tax info regarding properties owned by Defendants
Apr 29/2021	TS	0.40	Searching Alberta Land Titles Office
Apr 29/2021	JML	0.10	Reviewing correspondence from S. Joyce regarding status of dialogue with counsel for Canada Revenue Agency
Apr 29/2021	KHW	0.20	Reviewing land title searches for addresses associate with B. Ostrander
Apr 29/2021	JML	0.10	Reviewing issues regarding potential court application to resolve priority to funds held by Receiver

**Total Fees: 1,866.50**

**SUMMARY OF PROFESSIONAL SERVICES**

	HOURS	HOURLY RATE	AMOUNT
Rebecca Cobbe	0.40	205.00	82.00
Tatyana Sandroyan	0.70	225.00	157.50
Kaitlin H. Ward	2.70	275.00	742.50
Marek Coutu	0.90	285.00	256.50
Jeffrey M. Lee	0.80	785.00	628.00
	<u>5.50</u>		<u>1,866.50</u>

**DISBURSEMENTS AND OTHER CHARGES**

Imaging Services	1.25
AB Court of Queen's Bench Fax Filing	5.00
Tax Searches/Certificates - Calgary	20.00
Tax Searches/Certificates - Saskatoon	5.00
Computerized Legal Research - WestlaweCarswell	135.00
ISC/Land Titles	24.00

## DISBURSEMENTS AND OTHER CHARGES

Alberta Land Titles	30.00
Process Server - VENDOR: Darcy Tronnes; INVOICE#: 2021-255; DATE: 3/30/2021 - Payment of Invoice	55.00
	Total Taxable 275.25
AB Court of Queen's Bench Fax Filing	250.00
	Total Non-Taxable 250.00
	<b>Sub-Total Disbursements: 525.25</b>

## BILL SUMMARY

Total Fees	1,866.50
GST	93.33
SK PST	111.99
Total Disbursements	525.25
GST	13.77
Subtotal	<u>2,610.83</u>
<b>TOTAL AMOUNT DUE CDN DOLLARS:</b>	<b>\$ <u>2,610.83</u></b>

JML/ CRB

### **MLT Aikins LLP**

To the extent possible, we have made every effort to include fees and disbursements for the current billing period. In the event further fees or disbursements are incurred on your behalf, a subsequent account will be forwarded.

"Other Charges" are based on rates established by MLT AIKINS LLP and may change from time to time. A schedule of those rates is available on request.

### **TERMS: DUE UPON RECEIPT**

Interest at the rate of 14% per annum is added to all amounts overdue by 30 days or more.

**INVOICE**

**Deloitte Restructuring Inc.**  
**2300, 360 Main Street**  
**Winnipeg, MB R3C 3Z3**  
**Brent Warga**

**TO PROFESSIONAL SERVICES RENDERED TO AND INCLUDING 05/31/21 AS FOLLOWS**

**RE: Swift Hotels Group Ltd.**  
**FILE: 0056074-00014**

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
May 04/2021	KHW	0.20	Following up with Alberta counsel to Innovation Credit Union regarding enforcement efforts against P. Krahn, B. Ostrander and Ostrander Family Holdings
May 05/2021	KHW	0.20	Phone call with J. Regush, Alberta counsel for Innovation Credit Union, regarding enforcement efforts against B. Ostrander and Ostrander Family Holdings
May 06/2021	JML	0.20	Reviewing correspondence from B. Warga regarding request for filed copy of Receiver's Closing Certificate and prepare reply correspondence and giving instructions to locate filed copy of Receiver's Closing Certificate
May 06/2021	JML	0.20	Reviewing status of filing of Receiver's Closing Certificate
May 06/2021	AH	0.20	Corresponding regarding filing of Receiver's Certificate
May 06/2021	JML	0.10	Giving instructions to obtain filed copy of Receiver's Closing Certificate from Court of Queen's Bench
May 07/2021	KHW	0.40	Updating application to validate service
May 10/2021	JML	0.20	Reviewing correspondence from Swift Current Court of Queen's Bench regarding filed Receiver's Closing Certificate and prepare follow up correspondence to B. Warga
May 13/2021	KHW	0.20	Correspondence to J. Fritz regarding recovery strategies against Ostrander Family Holdings and Odyssey Hotels Group
May 19/2021	KHW	1.00	Drafting Application for Summary Judgment

Date	Initials	Hours	Narrative
May 20/2021	JML	0.20	Reviewing Draft Application For Summary Judgment against Odyssey Hotels Group Ltd. and provide comments on same
May 21/2021	KHW	0.30	Correspondence to J. Fritz and B. Warga providing draft Application for Summary Judgment
May 26/2021	JML	0.30	Reviewing correspondence from S. Joyce regarding request for information pertaining to sale of assets of debtor company and prepare reply correspondence and detailed follow up correspondence to B. Warga and J. Fritz
May 26/2021	MC	0.10	Reviewing correspondence from counsel for Innovation Credit Union and Canada Revenue Agency regarding value of prescribed security interest and issues for same
May 26/2021	AH	0.60	Corresponding regarding closing documents
May 26/2021	RHH	0.20	Reviewing agreement and closing matters
May 27/2021	JML	0.10	Reviewing correspondence from B. Warga regarding proposed response to inquiry from counsel for Innovation Credit Union and prepare reply correspondence

**Total Fees: 2,026.50**

**SUMMARY OF PROFESSIONAL SERVICES**

	HOURS	HOURLY RATE	AMOUNT
Kaitlin H. Ward	2.30	275.00	632.50
Marek Coutu	0.10	285.00	28.50
Aaron Haight	0.80	285.00	228.00
Ryan H. Hallman	0.20	585.00	117.00
Jeffrey M. Lee	1.30	785.00	1,020.50
	<u>4.70</u>		<u>2,026.50</u>

**DISBURSEMENTS AND OTHER CHARGES**

Imaging Services	1.50
Tax Searches/Certificates - Calgary	40.00
Total Taxable	41.50

**Sub-Total Disbursements: 41.50**

## **BILL SUMMARY**

Total Fees	2,026.50
GST	101.33
SK PST	121.59
Total Disbursements	41.50
GST	2.08
Subtotal	<u>2,292.99</u>
<b>TOTAL AMOUNT DUE CDN DOLLARS:</b>	<b>\$ <u>2,292.99</u></b>

JML/ CRB

### **MLT Aikins LLP**

To the extent possible, we have made every effort to include fees and disbursements for the current billing period. In the event further fees or disbursements are incurred on your behalf, a subsequent account will be forwarded.

"Other Charges" are based on rates established by MLT AIKINS LLP and may change from time to time. A schedule of those rates is available on request.

### **TERMS: DUE UPON RECEIPT**

Interest at the rate of 14% per annum is added to all amounts overdue by 30 days or more.

**INVOICE**

**Deloitte Restructuring Inc.**  
**2300, 360 Main Street**  
**Winnipeg, MB R3C 3Z3**  
**Brent Warga**

**TO PROFESSIONAL SERVICES RENDERED TO AND INCLUDING 06/30/21 AS FOLLOWS**

**RE: Swift Hotels Group Ltd.**  
**FILE: 0056074-00014**

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Jun 02/2021	KHW	0.20	Reviewing Receiver's Report in support of Summary Judgment Application
Jun 03/2021	JML	0.40	Revising and circulating Draft Receiver's Report in support of proposed summary judgment application
Jun 04/2021	JML	0.80	Preparing detailed report to counsel for Innovation Credit Union regarding value of assets of Swift Hotels Group Ltd., questions from counsel for Canada Revenue Agency and disposition of sale proceeds by Receiver
Jun 07/2021	KHW	0.60	Reviewing Receiver's Report and finalizing Application for Summary Judgment
Jun 07/2021	JML	0.10	Reviewing proposed summary judgment application
Jun 10/2021	KHW	0.20	Arranging to submit the Application for Summary Judgment against Odyssey Hotels Group Ltd. for filing
Jun 10/2021	JML	0.20	Reviewing correspondence from S. Joyce and D. Smith and prepare reply correspondence to S. Joyce and follow up correspondence to B. Warga and J. Fritz regarding status of dialogue between Innovation Credit Union and Canada Revenue Agency
Jun 10/2021	JML	0.10	Reviewing correspondence from D. Smith regarding response to request for undertaking from counsel for Innovation Credit Union
Jun 11/2021	JML	0.10	Telephone attendance on R. Sandbeck and S. Joyce regarding proposed communication with counsel to Canada Revenue Agency

Date	Initials	Hours	Narrative
Jun 14/2021	JML	0.10	Reviewing correspondence from S. Joyce regarding proposed correspondence to counsel for Canada Revenue Agency and prepare reply correspondence
Jun 14/2021	JML	0.10	Reviewing correspondence from S. Joyce to D. Smith and prepare follow up correspondence to B. Warga and J. Fritz
Jun 21/2021	KHW	0.30	Correspondence to J. Fritz and B. Warga providing filed copies of Summary Judgment application materials
Jun 24/2021	KHW	0.10	Follow-up phone call to T. Taylor to confirm service of Application for Summary Judgment
Jun 29/2021	JML	0.20	Reviewing correspondence from S. Joyce requesting clarification regarding value of assets sold by Receiver and prepare reply correspondence and follow up correspondence to B. Warga and J. Fritz regarding same
Jun 30/2021	JML	0.10	Reviewing correspondence from B. Warga regarding instructions to communicate with Receiver having no objections to release of information to counsel for Canada Revenue Agency
Jun 30/2021	JML	0.40	Reviewing issues regarding priority dispute between Canada Revenue Agency and Innovation Credit Union and prepare detailed correspondence to B. Warga regarding same
Jun 30/2021	JML	0.10	Correspondence to S. Joyce regarding response to June 29 e-mail inquiry on asset valuation issues
Jun 30/2021	JML	0.10	Telephone attendance on S. Joyce regarding asset valuation issues

**Total Fees: 2,583.00**

**SUMMARY OF PROFESSIONAL SERVICES**

	HOURS	HOURLY RATE	AMOUNT
Kaitlin H. Ward	1.40	275.00	385.00
Jeffrey M. Lee	2.80	785.00	2,198.00
	<u>4.20</u>		<u>2,583.00</u>

**DISBURSEMENTS AND OTHER CHARGES**

AB Court of Queen's Bench Fax Filing	40.00
Total Taxable	40.00
AB Court of Queen's Bench Fax Filing	100.00

## DISBURSEMENTS AND OTHER CHARGES

Total Non-Taxable	100.00
<b>Sub-Total Disbursements:</b>	<b>140.00</b>

## BILL SUMMARY

Total Fees	2,583.00
GST	129.15
SK PST	154.98
Total Disbursements	140.00
GST	2.00
Subtotal	<u>3,009.13</u>

**TOTAL AMOUNT DUE CDN DOLLARS: \$ 3,009.13**

JML/ CRB

### **MLT Aikins LLP**

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"Other Charges" are based on rates established by MLT AIKINS LLP and may change from time to time. A schedule of those rates is available on request.

### **TERMS: DUE UPON RECEIPT**

Interest at the rate of 14% per annum is added to all amounts overdue by 30 days or more.

July 31, 2021  
Invoice #6223151**INVOICE****Deloitte Restructuring Inc.**  
**2300, 360 Main Street**  
**Winnipeg, MB R3C 3Z3**  
**Brent Warga****TO PROFESSIONAL SERVICES RENDERED TO AND INCLUDING 07/31/21 AS FOLLOWS****RE: Swift Hotels Group Ltd.**  
**FILE: 0056074-00014**

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Jul 05/2021	KHW	0.20	Following up with legal counsel who filed Odyssey Hotels Group Ltd. Statement of Defence to confirm retainer and if he can accept service of Summary Judgment Application
Jul 12/2021	KHW	0.20	Arranging to effect service on B. Ostrander regarding application for summary judgment against Odyssey Hotels Group Ltd.
Jul 15/2021	KHW	0.20	Correspondence to T. Taylor requesting confirmation of service in writing; preparing application for an Order for Substitutional Service
Jul 26/2021	KHW	0.40	Submitting adjournment request in order to effect service; correspondence to Deloitte providing update on date change
Jul 27/2021	KHW	0.20	Preparing and filing Affidavit of Service regarding service of summary judgment application on P. Krahn

**Total Fees: 330.00****SUMMARY OF PROFESSIONAL SERVICES**

	<b>HOURS</b>	<b>HOURLY RATE</b>	<b>AMOUNT</b>
Kaitlin H. Ward	1.20	275.00	330.00
	<u>1.20</u>		<u>330.00</u>

**DISBURSEMENTS AND OTHER CHARGES**

Imaging Services	1.00
Postage Meter	37.39

## DISBURSEMENTS AND OTHER CHARGES

Alberta Corporate Registry	14.00
Total Taxable	52.39
<b>Sub-Total Disbursements:</b>	<b>52.39</b>

## BILL SUMMARY

Total Fees	330.00
GST	16.50
SK PST	19.80
Total Disbursements	52.39
GST	2.62
Subtotal	<u>421.31</u>
<b>TOTAL AMOUNT DUE CDN DOLLARS:</b>	<b>\$ <u>421.31</u></b>

JML/ CRB

### **MLT Aikins LLP**

To the extent possible, we have made every effort to include fees and disbursements for the current billing period. In the event further fees or disbursements are incurred on your behalf, a subsequent account will be forwarded.

"Other Charges" are based on rates established by MLT AIKINS LLP and may change from time to time. A schedule of those rates is available on request.

### **TERMS: DUE UPON RECEIPT**

Interest at the rate of 14% per annum is added to all amounts overdue by 30 days or more.

August 31, 2021  
Invoice #6227400**INVOICE****Deloitte Restructuring Inc.**  
**2300, 360 Main Street**  
**Winnipeg, MB R3C 3Z3**  
**Brent Warga****TO PROFESSIONAL SERVICES RENDERED TO AND INCLUDING 08/31/21 AS FOLLOWS****RE: Swift Hotels Group Ltd.**  
**FILE: 0056074-00014**

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Aug 10/2021	KHW	0.20	Preparing to attend application for summary judgment against Odyssey Hotels Group Ltd.
Aug 11/2021	KHW	3.40	Preparing for and attending Application for Summary Judgment against Odyssey Hotels Group Ltd.
Aug 11/2021	JML	0.10	Reviewing status of summary judgment application
Aug 11/2021	KHW	0.30	Telephone J. Fritz and B. Warga to discuss supplemental report in support of application for summary judgment against Odyssey Hotels Group Ltd.
Aug 11/2021	JML	0.30	Telephone attendance on J. Fritz and B. Warga regarding summary judgment application
Aug 19/2021	JML	0.50	Reviewing correspondence from S. Joyce inquiring as to information available to Receiver regarding value of personal property and prepare detailed correspondence to R. Sandbeck regarding same and follow up correspondence to J. Fritz and B. Warga
Aug 19/2021	JML	0.10	Reviewing correspondence from S. Joyce requesting authorization to release information to Justice Canada and prepare follow up correspondence to J. Fritz and B. Warga
Aug 20/2021	JML	0.10	Reviewing correspondence from B. Warga regarding book value calculations and prepare reply correspondence, follow up correspondence to S. Joyce and further follow up correspondence to B. Warga
Aug 20/2021	JML	0.10	Reviewing correspondence from S. Joyce to D. Smith regarding vaue of

Date	Initials	Hours	Narrative
			personal property and prepare follow up correspondence to B. Warga and J. Fritz
Aug 30/2021	KHW	0.20	Correspondence to J. Fritz confirming receipt of Receiver's Report and confirming status of Default Judgment
Aug 30/2021	JML	0.20	Revising Draft Supplementary Receiver's Report in support of summary judgment application
Aug 31/2021	KHW	0.60	Reviewing Receiver's Supplementary Report in support of summary judgment application against Odyssey Hotels Group
Aug 31/2021	JML	0.30	Revising and circulating Draft Supplementary Receiver's Report

**Total Fees: 2,627.00**

**SUMMARY OF PROFESSIONAL SERVICES**

	HOURS	HOURLY RATE	AMOUNT
Kaitlin H. Ward	4.70	275.00	1,292.50
Jeffrey M. Lee	1.70	785.00	1,334.50
	<u>6.40</u>		<u>2,627.00</u>

**DISBURSEMENTS AND OTHER CHARGES**

Imaging Services 15.25

Total Taxable 15.25

**Sub-Total Disbursements: 15.25**

**BILL SUMMARY**

Total Fees	2,627.00
GST	131.35
SK PST	157.62
Total Disbursements	15.25
GST	0.76
Subtotal	<u>2,931.98</u>

**TOTAL AMOUNT DUE CDN DOLLARS: \$ 2,931.98**

## MLT Aikins LLP

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"Other Charges" are based on rates established by MLT AIKINS LLP and may change from time to time. A schedule of those rates is available on request.

### **TERMS: DUE UPON RECEIPT**

Interest at the rate of 14% per annum is added to all amounts overdue by 30 days or more.

September 30, 2021  
Invoice #6233766**INVOICE****Deloitte Restructuring Inc.**  
**2300, 360 Main Street**  
**Winnipeg, MB R3C 3Z3**  
**Brent Warga****TO PROFESSIONAL SERVICES RENDERED TO AND INCLUDING 09/30/21 AS FOLLOWS****RE: Swift Hotels Group Ltd.**  
**FILE: 0056074-00014**

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Sep 02/2021	KHW	0.30	Reviewing revisions to paragraph 18 of Supplemental Report
Sep 02/2021	JML	0.20	Reviewing correspondence from J. Fritz and review revised Supplementary Receiver's Report and provide comments on same
Sep 03/2021	KHW	0.10	Arranging to file Supplemental Report of the Receiver and reschedule Application for Summary Judgment against Odyssey Hotels Group Ltd.
Sep 10/2021	KHW	0.20	Correspondence to Court of Queen's Bench requesting alternative dates to reschedule application for summary judgment against Odyssey Hotels Group Ltd.; providing update to Deloitte
Sep 20/2021	KHW	0.40	Correspondence to Deloitte advising of new date for summary judgment application; preparing package of documents to serve on P. Krahn

**Total Fees: 432.00****SUMMARY OF PROFESSIONAL SERVICES**

	<b>HOURS</b>	<b>HOURLY RATE</b>	<b>AMOUNT</b>
Kaitlin H. Ward	1.00	275.00	275.00
Jeffrey M. Lee	0.20	785.00	157.00
	<u>1.20</u>		<u>432.00</u>

**DISBURSEMENTS AND OTHER CHARGES**

Imaging Services	5.50
AB Court of Queen's Bench Fax Filing	0.00

## DISBURSEMENTS AND OTHER CHARGES

Postage Meter	30.10
Process Server - VENDOR: Darcy Tronnes INVOICE#: 2021-439 DATE: 07/16/2021 - Attempted service on Odyssey Hotels Group Ltd. on July 13, 2021 and July 14, 2021.	80.00
Total Taxable	115.60
AB Court of Queen's Bench Fax Filing	-50.00
Total Non-Taxable	-50.00
<b>Sub-Total Disbursements:</b>	<b>65.60</b>

## BILL SUMMARY

Total Fees	432.00
GST	21.60
SK PST	25.92
Total Disbursements	65.60
GST	5.78
Subtotal	550.90

**TOTAL AMOUNT DUE CDN DOLLARS: \$ 550.90**

JML/ CRB

### **MLT Aikins LLP**

To the extent possible, we have made every effort to include fees and disbursements for the current billing period. In the event further fees or disbursements are incurred on your behalf, a subsequent account will be forwarded.

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### **TERMS: DUE UPON RECEIPT**

Interest at the rate of 14% per annum is added to all amounts overdue by 30 days or more.

October 31, 2021  
Invoice #6241090**INVOICE****Deloitte Restructuring Inc.**  
**2300, 360 Main Street**  
**Winnipeg, MB R3C 3Z3**  
**Brent Warga****TO PROFESSIONAL SERVICES RENDERED TO AND INCLUDING 10/31/21 AS FOLLOWS****RE: Swift Hotels Group Ltd.**  
**FILE: 0056074-00014**

<b>Date</b>	<b>Initials</b>	<b>Hours</b>	<b>Narrative</b>
Oct 04/2021	JML	0.20	Reviewing correspondence from R. Sandbeck regarding decision of Innovation Credit Union to release residual holdback to CRA and prepare follow up correspondence to B. Warga and J. Fritz
Oct 04/2021	JML	0.20	Reviewing correspondence from B. Warga regarding instructions to request wire transfer particulars from counsel for CRA and prepare reply correspondence and follow up correspondence to D. Smith, counsel for CRA, requesting wire transfer particulars
Oct 04/2021	JML	0.10	Telephone attendance on D. Smith regarding arrangements for payment of residual holdback to CRA
Oct 04/2021	JML	0.20	Reviewing correspondence from D. Smith regarding method of payment of residual holdback to CRA and prepare reply correspondence and follow up correspondence to B. Warga and J. Fritz
Oct 06/2021	JML	0.20	Reviewing correspondence from B. Warga regarding arrangement for payment of holdback funds to CRA and prepare reply correspondence, follow up correspondence to D. Smith and further follow up correspondence to B. Warga
Oct 06/2021	JML	0.10	Reviewing correspondence from counsel to CRA regarding arrangements for payment of residual holdback and prepare follow up correspondence to B. Warga and J. Fritz
Oct 15/2021	JML	0.20	Reviewing correspondence from S. Joyce regarding status update on receivership and prepare follow up correspondence to B. Warga and J. Fritz
Oct 15/2021	JML	0.20	Reviewing correspondence from J. Fritz regarding status of Receiver's

Date	Initials	Hours	Narrative
			discharge application and prepare reply correspondence and follow up correspondence to J. Fritz and B. Warga
Oct 25/2021	KHW	0.20	Reviewing Affidavit of Service for Application for Summary Judgment against Odyssey Hotels Group Ltd. and updated form of order
Oct 29/2021	KHW	2.00	Preparing for and attending application for summary judgment against Odyssey Hotels Group Ltd.; providing updated form of Order to Master Mason and preparing correspondence to Odyssey Hotels Group Ltd. enclosing a Financial Statement of Debtor

**Total Fees: 1,704.00**

**SUMMARY OF PROFESSIONAL SERVICES**

	HOURS	HOURLY RATE	AMOUNT
Kaitlin H. Ward	2.20	275.00	605.00
Jeffrey M. Lee	1.40	785.00	1,099.00
	<u>3.60</u>		<u>1,704.00</u>

**DISBURSEMENTS AND OTHER CHARGES**

Deliveries	59.80
Imaging Services	13.00
AB Court of Queen's Bench Fax Filing	12.00
Total Taxable	84.80

**Sub-Total Disbursements: 84.80**

**BILL SUMMARY**

Total Fees	1,704.00
GST	85.20
SK PST	102.24
Total Disbursements	84.80
GST	4.24
Subtotal	<u>1,980.48</u>

**TOTAL AMOUNT DUE CDN DOLLARS: \$ 1,980.48**

## MLT Aikins LLP

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### **TERMS: DUE UPON RECEIPT**

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**Appendix H – Statement of Receipts and Disbursements for the Period November 28,  
2019 to November 30, 2021**

**SWIFT HOTELS GROUP LTD.**  
**STATEMENT OF RECEIPTS AND DISBURSEMENTS**  
for the period November 28, 2019 to November 30, 2021

	<u>Amount</u>	<u>Notes</u>
<b>Receipts</b>		
Cash on hand	\$ 4,325	
GST refund	11,502	
Pre-receivership accounts receivable	82,517	
Miscellaneous receipts and refunds	5,037	
Post closing receipts	24,844	
Room rentals	1,826,950	
Receiver's borrowings	250,000	
Recovery of funds from principals	52,000	
Recovery of funds from RBC	8,500	
Sale proceeds	3,900,000	
WCB refund	1,780	
<b>Total Receipts</b>	<b>6,167,456</b>	
<b>Disbursements</b>		
Advertising	15,209	
Bank fees / interest	46,912	
Booking fees	20,876	
Commission	119,197	
Credit card fees	39,766	
Equipment leasing	13,270	
Fire safety	29,984	
Filing fees	70	
Franchise / license fees	157,604	
Guest supplies and services	136,130	
GST paid on disbursements	39,991	
GST paid on legal fees	4,678	
GST paid on Receiver fees	19,224	
GST/HST remittance	34,653	
HST paid on disbursements	233	
Insurance	44,003	
Legal fees and disbursements	95,618	1
Miscellaneous disbursements	1,684	
Office supplies	4,406	
Payroll	451,968	
Payroll deduction remittances	135,634	
Property manager	191,078	
Property taxes	1,017,913	
PST paid on disbursements	19,159	
PST paid on legal fees	5,477	
PST remittance	97,835	
Receiver fees and disbursements	384,486	2
Repairs and maintenance	56,166	
Repayment of Receiver's borrowings	250,000	
Transfer to Bankruptcy Estate	35,000	
Unauthorized disbursements	4,570	
Utilities	193,870	
Waste removal	5,791	
WCB	11,254	
WEPP priority (Service Canada)	9,577	
<b>Total Disbursements</b>	<b>3,693,286</b>	
Advances to Innovation Credit Union	2,025,000	
Release of holdback to Canada Revenue Agency	313,718	
<b>Excess of Receipts over Disbursements - Funds Held in Trust as at November 30, 2021</b>	<b>\$ 135,452</b>	

**Notes:**

1) Includes legal fees and disbursements to October 31, 2021.

2) Includes Receiver fees and disbursements to September 30, 2021.