

July 14, 2020

File No.: 574391-2

Service List attached as Schedule "A"

To Whom it May Concern:

**RE: Innovation Credit Union et al. v 1764239 Alberta Ltd., et al
Court of Queen's Bench of Alberta Action No.: 1801-08520**

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

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

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

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

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

Yours truly,
Dentons Canada LLP



John Regush

JAKR/

Enclosures

Schedule "A"

SERVICE LIST

Innovation Credit Union and Concentra Bank v 1764239 Alberta Ltd., Ostrander Family Holdings Ltd.,
and Brian Ostrander

| <u>Party</u> | <u>Role</u> |
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| <p>Dentons Canada LLP</p> <p>1500, 850-2nd Street SW Calgary, Alberta T2P 0R8</p> <p>Attention: John Regush</p> <p>Email: john.regush@dentons.com</p> | <p><i>Counsel to the Plaintiffs, Innovation Credit Union and Concentra Bank</i></p> |
| <p>Burnet Duckworth and Palmer LLP</p> <p>2400, 525 – 8th Avenue SW Calgary, Alberta T2P 1G1</p> <p>Attention: James Murphy</p> <p>Email: jdm@bdplaw.com</p> | <p><i>Counsel to the Defendants, 1764239 Alberta Ltd., Ostrander Family Holdings Ltd., and Brian Ostrander, Defendants</i></p> |
| <p>Deloitte Restructuring Inc.</p> <p>700, 850 – 2nd Street SW Calgary, Alberta T2P 0R8</p> <p>Attention: Bob Taylor / Naomi McGregor</p> <p>Email: bobtaylor@deloitte.ca, naomcmgregor@deloitte.ca</p> | <p><i>Proposed Receiver of 1764239 Alberta Ltd.</i></p> |
| <p>Bodkin Capital Corporation</p> <p>102-1465 North Service Rd E Oakville, ON L6H 1A7</p> | <p><i>PPR Registrant</i></p> |
| <p>Blue Chip Leasing Corporation</p> <p>156 Duncan Mill Rd, Unit 16 Toronto, ON M3B3N2</p> | <p><i>PPR Registrant</i></p> |
| <p>Her Majesty the Queen in Right of Alberta</p> <p>6th Fl West Haultain Bldg 9811 109 St Edmonton, AB T5K 2L5</p> <p>Fax: 780 644 4924</p> | <p><i>PPR Registrant</i></p> |

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| <p>Workers' Compensation Board/Collection Unit</p> <p>9912 107 Street Edmonton, AB T5K 1G5</p> <p>Fax: 780 498 7999</p> | <p><i>PPR Registrant</i></p> |
| <p>Her Majesty the Queen in Right of Canada</p> <p>125,220-4th Ave SE Calgary, AB T3G 0L1</p> <p>Email: SATSO_LDPU_PPR@cra-arc.gc.ca</p> | <p><i>PPR Registrant</i></p> |
| <p>Callaghan Inn Limited</p> <p>238 Primrose Dr SE Medicine Hat, Alberta T1B 2A9</p> | <p><i>Land Titles Registrant</i></p> |
| <p>Primewest Mortgage Investment Corporation</p> <p>700, 750 Spadina Cres East Saskatoon, Saskatchewan S7K 3H3</p> | <p><i>Land Titles Registrant</i></p> |
| <p>Primewest Mortgage Investment Corporation</p> <p>Care of: Miller Thomson LLP 2700, 10155-102 Street Edmonton, Alberta T5J 4G8</p> <p>Attention: Dan R Chubb / Patrick Harnett</p> | <p><i>Land Titles Registrant</i></p> |
| <p>Her Majesty The Queen In Right Of Canada As Represented By Minister Of National Revenue Canada Revenue Agency</p> <p>200-419 7 Street South Post Office Box 3009, Station Main Lethbridge, Alberta T1J4A9</p> | <p><i>Land Titles Registrant</i></p> |
| <p>Her Majesty The Queen In Right Of Canada As Represented By Minister Of National Revenue</p> <p>330, 220-4 Ave SE Calgary, Alberta T2G 0L1</p> | <p><i>Land Titles Registrant</i></p> |
| <p>The City of Medicine Hat</p> <p>580-1 Street SE Medicine Hat, Alberta T1A8E6</p> | <p><i>Land Titles Registrant</i></p> |

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| <p>Her Majesty The Queen In Right Of Alberta As Represented By Minister Of Treasury Board And Finance</p> <p>6th Floor, 9811 109 Street Edmonton, Alberta T5K 0C8</p> | <p><i>Land Titles Registrant</i></p> |
| <p>Her Majesty The Queen In Right Of Canada As Represented By Minister Of National Revenue</p> <p>125, 220-4 Avenue SE Calgary, Alberta T2G0L1</p> | <p><i>Land Titles Registrant</i></p> |
| <p style="text-align: center;">Email List</p> <p>john.regush@dentons.com; jdm@bdplaw.com; bobtaylor@deloitte.ca; naomcgregor@deloitte.ca; SATSO_LDPU_PPR@cra-arc.gc.ca</p> | |