

# FASKEN

Fasken Martineau DuMoulin LLP  
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June 3, 2019  
File No.: 301368.00007

**Mihai Tomos**  
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mtomos@fasken.com

**TO: THE ATTACHED SERVICE LIST**

**Re: Maynbridge Capital Ltd. v Genco Holdings Ltd. et al, Action No.: 1901-04336 (the “Maynbridge Action”); and  
HSBC Bank Canada v. Genco Holdings Ltd., Action No.: 1901-03879 (the “HSBC Action”)**

We are counsel to Ernst & Young Inc., the Court appointed receiver of Genco Holdings Ltd. and Genco (Walden) Ltd.(collectively “**Genco**”) (the “**Receiver**”) in the Maynbridge Action and HSBC Action.

We are scheduled to appear before The Honourable Justice J. Gill on June 10, 2019 at 2:00 p.m. in **Edmonton** to make an application for an Order (Approval of Sale Processes) respecting the approval of sale processes in relation to certain assets of Genco. To this end, please see attached for service upon you, unfiled copies of:

- a) Application (with proposed form of Order) in the Maynbridge Action; and
- b) the First Report of the Receiver dated June 3, 2019 in the Maynbridge Action.

We will be filing identical materials, and will be seeking an identical Order, in the HSBC Action. We will provide you with proof of filing in both Actions shortly.

We trust you will find the foregoing to be in order. Should you have any questions or concerns, please do not hesitate to contact me.

Yours truly,

**FASKEN MARTINEAU DuMOULIN LLP**

  
Mihai Tomos  
MT/  
Enclosures

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## SCHEDULE "A" - SERVICE LIST

| Party                                                                                                                                                                                                             | Mode of Service                                                                             | Representing                                                                                             |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| <p>Borden Ladner Gervais LLP<br/>Centennial Place, East Tower<br/>1900, 520-3<sup>rd</sup> Avenue SW<br/>Calgary, AB T2P 0R3</p> <p>Attention: <b>Matti Lemmens/<br/>Jessica Cameron/<br/>Tiffany Bennett</b></p> | <p>Email:<br/>MLemmens@blg.com<br/>JCameron@blg.com<br/>TiBennett@blg.com</p>               | <p>Counsel to<br/>Maynbridge Capital<br/>Inc.</p>                                                        |
| <p>Ernst and Young Inc.<br/>2200, 215-2<sup>nd</sup> Street SW<br/>Calgary, AB T2P 1M4</p> <p>Attention: <b>Peter Chisholm/<br/>Dylan Holwell</b></p>                                                             | <p>Email:<br/>peter.chisholm@ca.ey.com<br/>dylan.holwell@ca.ey.com</p>                      | <p>Receiver</p>                                                                                          |
| <p>Fasken Martineau DuMoulin LLP<br/>3400, 350-7<sup>th</sup> Avenue SW<br/>Calgary, AB T2P 3N9</p> <p>Attention: <b>Travis Lysak/<br/>Mihai Tomos</b></p>                                                        | <p>Email:<br/>tlysak@fasken.com<br/>mtomos@fasken.com</p>                                   | <p>Counsel to Receiver</p>                                                                               |
| <p>McCarthy Tétrault LLP<br/>4000, 421-7<sup>th</sup> Avenue SW<br/>Calgary, AB T2P 4K9</p> <p>Attention: <b>Walker MacLeod/<br/>Sean F. Collins/<br/>Pantelis Kyriakakis</b></p>                                 | <p>Email:<br/>wmacleod@mccarthy.ca<br/>scollins@mccarthy.ca<br/>pkyriakakis@mccarthy.ca</p> | <p>Counsel to Genco<br/>Holdings Ltd., GDC<br/>Holdings Ltd. and<br/>their respective<br/>Guarantors</p> |
| <p>Torys LLP<br/>4600, 525 - 8<sup>th</sup> Avenue SW<br/>Calgary, AB T2P 1G1</p> <p>Attention: <b>Kyle Kashuba<br/>Evan Dickinson</b></p>                                                                        | <p>Email:<br/>kkashuba@torys.com<br/>edickinson@torys.com</p>                               | <p>Counsel to HSBC<br/>Bank Canada</p>                                                                   |
| <p>HSBC Bank Canada<br/>9<sup>th</sup> Floor, 407-8<sup>th</sup> Avenue SW<br/>Calgary, AB T2P 1E5</p> <p>Attention: <b>Cameron Bailey</b></p>                                                                    | <p>Email:<br/>cameron.bailey@hsbc.ca</p>                                                    | <p>HSBC Bank Canada</p>                                                                                  |

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| Party                                                                                                                                                                                                                            | Mode of Service                                                                        | Representing                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| <p>The City of Calgary<br/>Chief Financial Office<br/>Mail Code #8060, Muni 8-M3-5<br/>800 Macleod Trail SE<br/>Calgary, AB T2P 2M5</p> <p>Attention: <b>Nancy Bradshaw-Romanycia<br/>Tracy Hayter</b></p>                       | <p>Email:<br/>Nancy.Bradshaw-<br/>Romanycia@calgary.ca<br/>Tracy.hayter@calgary.ca</p> | The City of Calgary                                                                             |
| <p>Borden Ladner Gervais LLP<br/>Barristers &amp; Solicitors<br/>Centennial Place, East Tower<br/>1900, 520-3<sup>rd</sup> Avenue SW<br/>Calgary, AB T2P 0R3</p> <p>Attention: <b>Paul S. Taylor/<br/>David Madsen, Q.C.</b></p> | <p>Email:<br/>PaTaylor@blg.com<br/>DMadsen@blg.com</p>                                 | Counsel to Bancorp<br>Growth Mortgage<br>Fund II Ltd. and<br>Bancorp Financial<br>Services Inc. |
| <p>Norton Rose Fulbright Canada LLP<br/>3700, 400 – 3 Avenue SW<br/>Calgary, AB T2P 4H2</p> <p>Attention: <b>Steven G. Raby, Q.C.</b></p>                                                                                        | <p>Email:<br/>steve.raby@nortonrosefulbright.com</p>                                   | Counsel to 1124294<br>Alberta Ltd.                                                              |
| <p>McMillan LLP<br/>TD Canada Trust Tower<br/>1700, 421-7<sup>th</sup> Avenue SW<br/>Calgary, AB T2P 4K9</p> <p>Attention: <b>Adam Maerov</b></p>                                                                                | <p>Email:<br/>adam.maerov@mcmillan.ca</p>                                              | Counsel to Bolero<br>Enterprises Inc.                                                           |
| <p>McMillan LLP<br/>TD Canada Trust Tower<br/>1700, 421-7<sup>th</sup> Avenue SW<br/>Calgary, AB T2P 4K9</p> <p>Attention: <b>Adam Maerov</b></p>                                                                                | <p>Email:<br/>adam.maerov@mcmillan.ca</p>                                              | Counsel to 1523674<br>Alberta Ltd.                                                              |
| <p>Blake Cassels &amp; Graydon LLP<br/>3500, 855-2<sup>nd</sup> Street SW<br/>Calgary, AB T2P 4J8</p> <p>Attention: <b>Richard D. Bell</b></p>                                                                                   | <p>Email:<br/>richard.bell@blakes.com</p>                                              | Counsel to Omicron<br>Construction Ltd.                                                         |
| <p>Bishop &amp; McKenzie LLP<br/>2200, 555-4<sup>th</sup> Avenue SW<br/>Calgary, AB T2P 3E7</p> <p>Attention: <b>Francis N.J. Taman</b></p>                                                                                      | <p>Email:<br/>ftaman@bmlp.ca</p>                                                       | Counsel to HMT<br>Holdings Inc.                                                                 |
| <p>Blake, Cassels &amp; Graydon LLP<br/>3500, 855-2<sup>nd</sup> Street SW<br/>Calgary, AB T2P 4J8</p>                                                                                                                           | <p>Email:<br/>ryan.zahara@blakes.com</p>                                               | Counsel to ATB<br>Financial                                                                     |

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| Party                                                                                                                                                                                                            | Mode of Service                                          | Representing                                                                               |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|--------------------------------------------------------------------------------------------|
| Attention: <b>Ryan Zahara</b>                                                                                                                                                                                    |                                                          |                                                                                            |
| McLennan Ross LLP<br>600 McLennan Ross Building<br>12220 Stony Plain Road<br>Edmonton, AB T5N 3Y4<br>Attention: <b>Chuck Russell, Q.C.</b>                                                                       | Email:<br>crussell@mross.com                             | Counsel to Canadian<br>Western Bank<br>Creditor                                            |
| MLT Aikins LLP<br>2100 Livingston Place<br>222-3 <sup>rd</sup> Avenue SW<br>Calgary, AB T2P 0B4<br>Attention: <b>Jeff Lee, Q.C./<br/>Catrina Webster</b>                                                         | Email:<br>jmlee@mltaikins.com<br>cwebster@mltaikins.com  | Counsel to Crown<br>Capital Fund IV, LP<br>and Crown Capital<br>Fund IV Management<br>Inc. |
| MLT Aikins LLP<br>2100 Livingston Place<br>222-3 <sup>rd</sup> Avenue SW<br>Calgary, AB T2P 0B4<br>Attention: <b>Chris Hahn</b>                                                                                  | Email:<br>chahn@mltaikins.com                            | Counsel to Crown<br>Capital LP Partner<br>Funding Inc.                                     |
| The City of Calgary<br>Law and Legislative Services Dept.<br>12 <sup>th</sup> Floor, Municipal Building<br>800 Macleod Trail SE (12-G3-5)<br>Calgary, AB T2P 2M5<br>Attention: <b>Josie Saab/<br/>Henry Chan</b> | Email:<br>Josie.Saab@calgary.ca<br>Henry.Chan@calgary.ca | The City of Calgary                                                                        |
| Beaumont Church LLP<br>300-2912 Memorial Drive SE<br>Calgary, AB T2A 6R1<br>Attention: <b>Stanley A. Church Q.C.</b>                                                                                             | Email:<br>stan.church@beaumontchurch.com                 | Counsel to John E.<br>Lamb and Kimberly I.<br>Lamb                                         |
| Jasbir Singh Hans<br>149 Coral Sands Place NE<br>Calgary, AB T3J 3J2                                                                                                                                             | Courier                                                  | Jasbir Singh Hans                                                                          |
| Tarlok Singh Tatla<br>11 Del Ray Crescent NE<br>Calgary, AB T1Y 6V8                                                                                                                                              | Courier                                                  | Tarlok Singh Tatla                                                                         |
| Pali Bedi<br>513 Edgebank Place NW<br>Calgary, AB T3A 4V6                                                                                                                                                        | Courier                                                  | Pali Bedi                                                                                  |