



NO. S253697
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INSTITUTIONAL MORTGAGE CAPITAL CANADA INC., in its
capacity as general partner of IMC LIMITED PARTNERSHIP

PETITIONER

AND:

1048799 B.C. LTD., 1580006 B.C. LTD., BALJIT SINGH JOHAL,
BANCORP BALANCE MORTGAGE FUND II LTD., BANCORP
GROWTH MORTGAGE FUND II LTD., BANCORP FINANCIAL
SERVICES INC., AND MANDATE MANAGEMENT
CORPORATION, COAST CAPITAL SAVINGS FEDERAL
CREDIT UNION, G4 CONSTRUCTION LTD., BULAND
CONSTRUCTION LTD., LIFETIME CONSTRUCTION LTD.,
BEST CANADIAN HOMES LTD., GILL 22 CONSTRUCTION
LTD., 1370395 B.C. LTD., HARJUS CONSTRUCTION LTD., and
1507718 B.C. LTD.

RESPONDENTS

NOTICE OF APPLICATION

Name of applicant: Alvarez & Marsal Canada Inc. ("**A&M**"), in its capacity as court appointed
receiver and manager (the "**Receiver**")

To: the Service List, attached **Schedule "A"** to this Notice of Application

TAKE NOTICE that an application will be made by the Receiver to Madam Justice Wilkinson at
the courthouse at 800 Smithe Street, Vancouver, British Columbia on 29/Jul/2026 at 09:00 AM
for the order set out in Part 1 below.

The applicant estimates that the application will take 1 hour.

- ☐ This matter is within the jurisdiction of an associate judge.
- ☒ This matter is not within the jurisdiction of an associate judge. Madame Justice
Wilkinson is seized of this proceeding.

Part 1: ORDER(S) SOUGHT

1. An order substantially in the form attached hereto as **Schedule "B" (the "Order")**:

- (a) approving the activities of the Receiver (the "**Activities**") from July 23, 2025 to January 30, 2026, as described in the First Report of the Receiver dated February 4, 2026 and the Second Report of the Receiver dated July 13, 2026 (collectively, the "**Receiver's Reports**");
- (b) approving the fees and disbursements of the Receiver in the amount of \$241,147.82, inclusive of applicable taxes, for the period from July 23, 2025 to April 30, 2026;
- (c) approving the fees and disbursements of the Receiver's legal counsel, Norton Rose Fulbright Canada LLP ("**NRF**"), in the amount of \$220,438.79, inclusive of applicable taxes, for the period from July 23, 2025 to May 31, 2026;
- (d) approving the Receiver's further fees and disbursements for the period from May 1, 2026 to the completion of this matter (the "**Receiver's Final Fees**"), provided that such amount shall not exceed \$15,750, inclusive of applicable taxes;
- (e) approving NRF's further fees and disbursements for the period from June 1, 2026 to the completion of this matter (the "**NRF Final Fees**", and together with the Receiver's Further Fees, the "**Final Fees**"), provided that such amount shall not exceed \$8,400, inclusive of applicable taxes;
- (f) authorizing the Receiver to hold back the balance of funds after payment of the Final Fees (the "**Holdback Funds**") to apply to any potential outstanding or unanticipated obligations under these proceedings for a period of three (3) months after the date of the Order;
- (g) ordering that any funds held by the Receiver further to these proceedings, including any remaining Holdback Funds after the three (3) months period, shall be paid by the Receiver to the Petitioner on account of monies and obligations owing by the Respondent, 1048799 B.C. LTD., to the Petitioner, Institutional Mortgage Capital Canada Inc.;
- (h) discharging the Receiver from further duties and obligations in these proceedings; and
- (i) such further and other relief as this Honourable Court may deem just.

Part 2: FACTUAL BASIS

1. On July 23, 2025, this Honourable Court granted an order (the "**Receivership Order**") appointing A&M as receiver and manager of the assets, undertakings and property of Mortise (Scott Road Residential) Holdings Ltd., Mortise (Scott Road Office) Holdings Ltd., Mortise (Scott Road Commercial) Holdings Ltd. (the "**Nominees**"), and 1048799 B.C. Ltd. ("**104**" and collectively with the Nominees, the "**Debtors**").
2. The Nominees and 104 are the legal and beneficial owners, respectively, of 8140 120th Street, Surrey, B.C. (the "**Property**").

3. On October 1, 2025, the Receiver retained CBRE to market the Property and commenced a sales process.
4. On October 20, 2025, the Receiver entered into a contract of purchase and sale (the "**Sale Agreement**") between the Nominees, 104, the Receiver and 0952653 B.C. Ltd. (the "**Purchaser**") for the Property.
5. On February 13, 2026, the Court granted the Approval and Reverse Vesting Order (the "**RVO**"), which approved the sale of the Property pursuant to the Sale Agreement.
6. On March 12, 2026, in accordance with the RVO, the Receiver executed and delivered a certificate (the "**Receiver's Certificate**") to the Purchaser, confirming that the sale transaction pursuant to the Sale Agreement (the "**Transaction**") had been completed. The Receiver's Certificate was filed with the Court on March 13, 2026.
7. Pursuant to the RVO, upon the delivery of the Receiver's Certificate, the Nominees were discharged from the Receivership Proceedings, 1580006 B.C. Ltd. was incorporated as a new subsidiary of 104 ("**Residual Co**"), and Residual Co. was substituted as a Respondent to the Receivership Proceedings. In addition, in accordance with the RVO, the style of cause for the Receivership Proceedings was amended by deleting the Nominees as Respondent and replacing it with Residual Co as a Respondent.
8. The Receiver has substantially completed its mandate and now seeks approval of its activities and its fees and the fees of its legal counsel, NRF, together with an order discharging the Receiver.
9. The Receiver's Reports detail the activities of the Receiver since its appointment, which includes, but are not limited to, the following:
 - (a) managing the Property, including collecting rent and corresponding with tenants regarding various tenancy matters, including repairs and maintenance issues with the assistance of the property manager retained by the Receiver;
 - (b) preparing and reviewing payments, reconciling cash receipts and disbursements, and maintaining the Receiver's books and records;
 - (c) attending to statutory duties and government reporting matters, including corresponding with the Canada Revenue Agency regarding trust examinations and related information requests;
 - (d) liaising with the Receiver's sales agent, CBRE, to market the Property, including reviewing sales materials, reviewing progress reports and engaging in discussions with various stakeholders and the Purchaser regarding the Sale Agreement;
 - (e) establishing, updating, and maintaining the Receiver's website with relevant information relating to the Receivership Proceedings;

- (f) instructing NRF to assist with various matters, including but not limited to the collection of information from the Debtors, preparation of court application materials, preparation and review of transaction and closing documentation relating to the sale of the Property, review of loan and security documentation, and addressing statutory and regulatory matters;
 - (g) attending to closing of the sale transaction of the Property pursuant to the RVO;
 - (h) coordinating and attending to various post-closing matters;
 - (i) attending to correspondence with the Debtors and their counsel regarding various matters, including the sale of the Property and tax-related issues;
 - (j) attending to correspondence and communications from other secured creditors; and
 - (k) preparing the Receiver's Report to this Honourable Court.
10. The Receiver submits that the Activities were necessary in these proceedings.
 11. Pursuant to paragraphs 21 and 22 of the Receivership Order, the Receiver and its legal counsel are to be paid their fees and disbursements, in each case at their standard rates and charges. The Receiver and its counsel are also to pass their accounts from time to time, including by referral to a judge of this Court to be heard on a summary basis.
 12. The particulars of the fees of the Receiver and its legal counsel, NRF, are summarized in the Second Report, Affidavit No. 1 of Anthony Tillman made July 14, 2026 (the "**Tillman Affidavit**"), and Affidavit No. 1 of Katie Mak made July 14, 2026 (the "**Mak Affidavit**").
 13. The Receiver has reviewed NRF's invoices as set out in the Mak Affidavit and has concluded that they are reasonable and appropriate in the circumstances.
 14. The Receiver submits that the fees of the Receiver and NRF are fair and reasonable in the circumstances, and the time spent was necessary and the work was delegated to the appropriate professionals within each firm. Accordingly, the Receiver seeks an Order approving the fees of the Receiver its legal counsel, NRF.

Part 3: LEGAL BASIS

15. The Receiver relies on the following:
 - (a) Sections 183 and 243 of the *Bankruptcy and Insolvency Act*, RSC 1985, c. B-3, as amended.
 - (b) The Receivership Order made July 23, 2025.
 - (c) The inherent jurisdiction of this Honourable Court.

- (d) Such further legal basis as counsel may advise.

Approval of Receiver's Report and Activities

16. The Receiver's Reports outline the specific activities of the Receiver since its appointment.
17. This Court has inherent jurisdiction to review the activities of a court-appointed receiver and, if satisfied that the receiver has acted reasonably, prudently and not arbitrarily, to approve the activities set out in the receiver's report. This assessment is made on an objective basis.

Leslie & Irene Dube Foundation Inc. v. P218 Enterprises Ltd., 2014 BCSC 1855
at para. 54

18. Approval of the Receiver's activities is appropriate in the circumstances because such approval will:
 - (a) allow the Receiver, the Petitioner, and the other stakeholders to move forward confidently with the conclusion and termination of the Receivership;
 - (b) bring the Receiver's activities in issue before the Court, providing an opportunity for the concerns of this Court, the Petitioner, and other stakeholders to be addressed, and any problems to be rectified in a timely way;
 - (c) provides certainty and finality in the Receivership and to the activities undertaken by the Receiver, while providing an opportunity for the Petitioner and the stakeholders to raise specific objections and concerns;
 - (d) enables this Court, tasked with supervising the Receivership, to satisfy itself that the Receiver's court-mandated activities have been conducted in a prudent and diligent manner;
 - (e) provides protection for the Receiver not otherwise provided by statute; and
 - (f) protects creditors from delay that would be caused by:
 - (i) re-litigation of steps taken to date; and
 - (ii) potential indemnity claims by the Receiver.

Target Canada Co (Re), 2015 ONSC 7574 at paras 12, 23

19. The Receiver respectfully submits that its activities, as described in the Receiver's Reports, have been carried out in a reasonable, prudent and not arbitrary manner, and accordingly, seeks approval of its activities.

Approval of Fees

20. Factors courts will consider in assessing the reasonableness of a receiver's fees include the following:

- (a) the nature, extent, and value of the assets;
- (b) the complications and difficulties encountered by the receiver;
- (c) the degree of assistance provided by the debtor;
- (d) the time spent by the receiver;
- (e) the receiver's knowledge, experience, and skill;
- (f) the diligence and thoroughness displayed by the receiver;
- (g) the responsibilities assumed; the results of the receiver's efforts; and
- (h) the cost of comparable services.

Frank Bennett, *Bennett on Receiverships* 3rd ed (Toronto: Carswell, 2011) at 595
[*Bennett*]

Nortel Networks Corp, Re, 2017 ONSC 673 at para. 13

21. A receiver's fees must be "fair and reasonable, moderate and not generous, but sufficient to induce competent people to act as receivers."

Vantreight v Vantreight, 2007 BCSC 1345 [*Vantreight*] at para 43

Street v Sather Ranch Ltd, 2021 BCSC 1090 at para 50 [*Sather Ranch*] 3

22. This analysis is informed by the need to ensure that a monitor or receiver is fairly compensated, while ensuring the efficiency and integrity of the insolvency proceedings.

Nortel Networks Corp, Re, 2017 ONSC 673 at para. 13

23. As noted by the New Brunswick Court of Appeal:

There is no fixed rate or settled scale for determining the amount of compensation to be paid a receiver. He is usually allowed either a percentage upon his receipts or a lump sum based upon the time, trouble and degree of responsibility involved. The governing principle appears to be that the compensation allowed a receiver should be measured by the fair and reasonable value of his services and while sufficient fees should be paid to induce competent persons to serve as receivers, receiverships should be administered as economically as possible. Thus allowances for services must be just, but nevertheless moderate rather than generous.

Belyea v Federal Business Development Bank (1983), 44 NBR (2d) 248, 1983
CarswellNB 27 (CA) at para 3

Sather Ranch at para 52

24. It is not necessary for a court to go through the supporting documentation for the fees line by line to determine what the appropriate fees are. Nor is the court to second-guess the amount of time spent by a receiver unless it is clearly excessive or overreaching.

Bank of Nova Scotia v Diemer, 2014 ONSC 365 at para 19

25. Similar factors are considered in the assessment of the accounts of legal counsel to a receiver, including:
- (a) the time expended;
 - (b) the complexity of the receivership;
 - (c) the degree of responsibility assumed by the lawyers;
 - (d) the amount of money involved, including the amount of proceeds after payments to the creditors;
 - (e) the degree and skill of the lawyers involved;
 - (f) the results achieved; and
 - (g) the client's expectations as to the fee.

Bennett at 600

Vantreight at para 43

26. The Receiver submits that its fees are fair and reasonable in the circumstances, particularly in light of the significant time and effort expended by the Receiver in performing the activities detailed in the Receiver's Report. Similarly, the Receiver submits that its counsel's fees and disbursements are fair, reasonable, and consistent with the market for similar legal services in British Columbia.

Discharge of Receiver

27. Once the receiver has achieved the goals of the receivership, the court should terminate the receiver's appointment and discharge the receiver.

Bennett at 601

28. The Receiver has substantially completed all of the activities related to the administration of these proceedings and the Receiver ought now to be discharged.

Part 4: MATERIAL TO BE RELIED ON

1. Receivership Order made July 23, 2025
2. First Report of the Receiver dated February 4, 2026
3. Approval and Reverse Vesting Order made February 13, 2026
4. Receiver's Certificate dated March 12, 2026
5. Second Report of the Receiver dated July 13, 2026
6. Affidavit of Anthony Tillman sworn July 14, 2026
7. Affidavit of Katie Mak sworn July 14, 2026
8. Such further material as counsel may advise and this Honourable Court may allow.

TO THE PERSONS RECEIVING THIS NOTICE OF APPLICATION: If you wish to respond to this notice of application, you must, within 5 business days after service of this notice of application or, if this application is brought under Rule 9-7, within 8 business days after service of this notice of application,

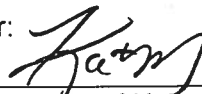
- (a) file an application response in Form 33,
- (b) file the original of every affidavit, and of every other document, that:
 - (i) you intend to refer to at the hearing of this application, and
 - (ii) has not already been filed in the proceeding, and
- (c) serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:
 - (i) a copy of the filed application response;
 - (ii) a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on that person;
 - (iii) if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7 (9).

Norton Rose Fulbright Canada LLP

Date:

July 14, 2026

per:



Signature of Katie Mak

☒ Lawyer for the Receiver

To be completed by the court only:

Order made

☐ in the terms requested in paragraphs _____ of Part 1 of this notice of application

☐ with the following variations and additional terms:

Date: _____

Signature of ☐ Judge ☐ Associate Judge

APPENDIX**THIS APPLICATION INVOLVES THE FOLLOWING:**

- ☐ discovery: comply with demand for documents
- ☐ discovery: production of additional documents
- ☐ other matters concerning document discovery
- ☐ extend oral discovery
- ☐ other matter concerning oral discovery
- ☐ amend pleadings
- ☐ add/change parties
- ☐ summary judgment
- ☐ summary trial
- ☐ service
- ☐ mediation
- ☐ adjournments
- ☐ proceedings at trial
- ☐ case plan orders: amend
- ☐ case plan orders: other
- ☐ experts

SCHEDULE A

NO. S253697
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INSTITUTIONAL MORTGAGE CAPITAL CANADA INC., in its
capacity as general partner of IMC LIMITED PARTNERSHIP

PETITIONER

AND:

1048799 B.C. LTD., 1580006 B.C. LTD., BALJIT SINGH JOHAL,
BANCORP BALANCE MORTGAGE FUND II LTD., BANCORP
GROWTH MORTGAGE FUND II LTD., BANCORP FINANCIAL
SERVICES INC., AND MANDATE MANAGEMENT
CORPORATION, COAST CAPITAL SAVINGS FEDERAL
CREDIT UNION, G4 CONSTRUCTION LTD., BULAND
CONSTRUCTION LTD., LIFETIME CONSTRUCTION LTD.,
BEST CANADIAN HOMES LTD., GILL 22 CONSTRUCTION
LTD., 1370395 B.C. LTD., HARJUS CONSTRUCTION LTD., and
1507718 B.C. LTD.

RESPONDENTS

SERVICE LIST

[Current to: July 14, 2026]

Norton Rose Fulbright Canada LLP 1800 – 510 West Georgia Street Vancouver, BC V6B 0M3 Attention: Katie Mak / Thea Udwadia Email: Katie.Mak@nortonrosefulbright.com / thea.udwadia@nortonrosefulbright.com Tel: 604-687-6575 <i>Counsel for Alvarez & Marsal Canada Inc.</i>	Lawson Lundell LLP 1600 – 925 West Georgia Street Vancouver, BC V6C 3L2 Attention: Bryan Gibbons/ Candace Formosa Email: bgibbons@lawsonlundell.com / cformosa@lawsonlundell.com Bryan Tel: 604-631-9152 Candace Tel: 604-631-3616 <i>Counsel for Institutional Mortgage Capital Canada Inc., in its capacity as general partner of IMC Limited Partnership IMC</i>
Harper Grey LLP 3200 – 650 West Georgia Street Vancouver, B.C., V6B 4P7	Koffman Kalef LLP 19th Floor, 885 West Georgia Street Vancouver, B.C., V6C 3H4

Attention: Salman Y. Bhura / Erin Hatch Email: sbhura@harpergrey.com / ehatch@harpergrey.com Tel: 604-687-0411 <i>Counsel for the Debtors, Mortise (Scott Road Residential) Holdings Ltd., Mortise (Scott Road Office) Holdings Ltd., Mortise (Scott Road Commercial) Holdings Ltd., 1048799 B.C. Ltd., Baljit Singh Johal</i>	Attention: Shawn A. Poisson Email: sap@kkbl.com Tel: 604-891-3610 <i>Counsel for the Bancorp Parties, Bancorp Balanced Mortgage Fund II Ltd. Bancorp Growth Mortgage Fund II Ltd. Bancorp Financial Services Inc. Mandate Management Corporation</i>
Watson Goepel LLP Vancouver (Head Office) Suite 1200 1075 West Georgia Street Vancouver, BC V6E 3C9 Attention: Elias Notopoulos / Jeremy D. West Email: enotopoulos@watsongoepel.com / jwest@watsongoepel.com Tel: 604-631-3232 <i>Counsel to 0952653 B.C. LTD.</i>	Fasken Martineau DuMoulin LLP 550 Burrard St Suite 2900 Vancouver, BC V6C 0B3 Attention: Nathan Wells Email: nwells@fasken.com Tel: 604-631-3232 <i>Counsel to 1361520 B.C. Ltd.</i>
Ministry of Finance, RMO, Collections Section PO Box 9445 STN Prov Govt Victoria, BC V8W 9V5 Attention: Laura Cruz	Deputy Attorney General of Canada British Columbia Regional Office Department of Justice Canada 900 – 840 Howe Street Vancouver, BC V6Z 2S9 Email: AGC_PGC_VANCOUVER@JUSTICE.GC.CA agc-pgc.vancouver-tax-fiscal@justice.gc.ca
Canada Revenue Agency Surrey National Verification and Collection Centre 9755 King George Boulevard Surrey, BC V3T 5E1 Email: AGLSBRevTaxInsolvency@gov.bc.ca	Deputy Attorney General PO Box 9290 Stn Prov Govt Victoria, BC V8W 9J7 Email: MAG.Correspondence@gov.bc.ca
Alvarez & Marsal Canada Inc. Licensed Insolvency Trustees Cathedral Place Building 925 West Georgia Street, Suite 902 Vancouver, BC V6C 3L2	

Attention: Anthony Tillman / Pinky Law Tel (Anthony): 604-639-0849 Tel (Pinky): 604-638-7446 Email: atillman@alvarezandmarsal.com / pinky.law@alvarezandmarsal.com	
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EMAIL SERVICE LIST

[Current to: July 14, 2026]

TO:

Katie.Mak@nortonrosefulbright.com; thea.udwadia@nortonrosefulbright.com;
alice.phan@nortonrosefulbright.com; bgibbons@lawsonlundell.com;
cformosa@lawsonlundell.com; sbhura@harpergrey.com; ehatch@harpergrey.com;
enotopoulos@watsongoepel.com; jwest@watsongoepel.com; nwells@fasken.com;
AGC_PGC_VANCOUVER@JUSTICE.GC.CA; agc-pgc.vancouver-tax-fiscal@justice.gc.ca;
AGLSBRevTaxInsolvency@gov.bc.ca; MAG.Correspondence@gov.bc.ca;
atillman@alvarezandmarsal.com pinky.law@alvarezandmarsal.com; cyoon@harpergrey.com

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INSTITUTIONAL MORTGAGE CAPITAL CANADA INC., in its
capacity as general partner of IMC LIMITED PARTNERSHIP

PETITIONER

AND:

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LTD., 1370395 B.C. LTD., HARJUS CONSTRUCTION LTD., and
1507718 B.C. LTD.

RESPONDENTS

ORDER MADE AFTER APPLICATION

	)	)	
	)	)	
BEFORE	)	)	____/____/2026
	)	)	
	)	)	

THE HONOURABLE
MADAM JUSTICE WILKINSON

ON THE APPLICATION of Alvarez & Marsal Canada Inc. ("**A&M**"), in its capacity as court appointed receiver and manager (in such capacity, the "**Receiver**"), coming on for hearing at Vancouver, B.C. on 29/Jul/2026 at 09:00 AM and on hearing Katie Mak, counsel for the Receiver, and those other counsel appearing listed at Schedule "A", hereto if any;

THIS COURT ORDERS THAT:

1. The activities of the Receiver, as set out in the First Report of the Receiver dated February 4, 2026, the Second Report of the Receiver dated July 13, 2026, are hereby approved, provided that A&M, in its personal capacity and only with respect to its own personal liability, shall be entitled to rely upon or utilize in any way such approval.
2. The total fees and disbursements of the Receiver in the amount of \$241,147.82, inclusive of applicable taxes, for the period from July 23, 2025 to April 30, 2026, be and are hereby approved.
3. The total fees and disbursements of the Receiver's legal counsel, Norton Rose Fulbright Canada LLP ("**NRF**"), in the amount of \$220,438.79, inclusive of applicable taxes, for the period from July 23, 2025 to May 31, 2026, be and are hereby approved.
4. The Receiver's further fees and disbursements for the period from May 1, 2026 to the completion of this matter be and are hereby approved (the "**Receiver's Final Fees**"), provided that such amount shall not exceed \$15,750, inclusive of applicable taxes.
5. NRF's further fees and disbursements for the period from June 1, 2026 to the completion of this matter be and are hereby approved (the "**NRF Final Fees**", and together with the Receiver's Further Fees, the "**Final Fees**"), provided that such amount shall not exceed \$8,400, inclusive of applicable taxes.
6. The Receiver is hereby authorized to hold back the balance of the funds remaining after payment of the Final Fees (the "**Holdback Funds**") to apply to any potential outstanding or unanticipated obligations under these proceedings for a period of three (3) months after the date of this Order.
7. Any funds held by the Receiver further to these proceedings, including any remaining Holdback Funds after the three (3) months set out in paragraph 6 hereto, shall be paid by the Receiver to the Petitioner on account of monies and obligations owing by the Respondent, 1048799 B.C. LTD., to the Petitioner, Institutional Mortgage Capital Canada Inc
8. The Receiver is hereby released and discharged as receiver in these proceedings and is released and discharged from any and all claims that any person may have or be entitled to assert against the Receiver in any way relating to, arising out of, or in respect of these proceedings, save and except as may result from the gross negligence or wilful misconduct of the Receiver.
9. In addition to the rights and protections afforded the Receiver under the *Bankruptcy and Insolvency Act*, RSC 1985, c B-3, or as an officer of this Court, the Receiver shall incur no

liability or obligation as a result of its appointment or the carrying out of its mandate, save and except for any gross negligence or wilful misconduct on its part. Nothing in this Order shall derogate from the rights and protections afforded the Receiver by the *Bankruptcy and Insolvency Act* or any applicable legislation.

10. Notwithstanding anything to the contrary contained in this or any other order of this Honourable Court made in these proceedings, on its discharge, 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 favour of A&M in its capacity as Receiver.
11. The Receiver shall be at liberty, and is hereby authorized and empowered, to make such further applications, motions or proceedings to or before such other courts and judicial, regulatory or administrative bodies, and take such other steps as may be necessary or advisable to give effect to this Order.
12. The Receiver may apply to this Court for advice and directions in relation to the discharge of this Order and its duties hereunder.
13. Endorsement of this Order, other than by counsel for the Receiver, is hereby dispensed with.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED AS ABOVE AS BEING MY CONSENT:

Signature of Katie Mak, Lawyer for Alvarez &
Marsal Canada Inc., in its capacity as Court-
appointed Receiver

By the Court

Registrar

Schedule "A"

Counsel Appearing

In the Supreme Court of British Columbia

Between

INSTITUTIONAL MORTGAGE CAPITAL CANADA INC., in its
capacity as general partner of IMC LIMITED PARTNERSHIP

PETITIONER

AND:

MORTISE (SCOTT ROAD RESIDENTIAL) HOLDINGS LTD.,
MORTISE (SCOTT ROAD OFFICE) HOLDINGS LTD., MORTISE
(SCOTT ROAD COMMERCIAL) HOLDINGS LTD., 1048799 B.C.
LTD., BALJIT SINGH JOHAL, BANCORP BALANCE
MORTGAGE FUND II LTD., BANCORP GROWTH MORTGAGE
FUND II LTD., BANCORP FINANCIAL SERVICES INC., AND
MANDATE MANAGEMENT CORPORATION, COAST CAPITAL
SAVINGS FEDERAL CREDIT UNION, G4 CONSTRUCTION
LTD., BULAND CONSTRUCTION LTD., LIFETIME
CONSTRUCTION LTD., BEST CANADIAN HOMES LTD., GILL
22 CONSTRUCTION LTD., 1370395 B.C. LTD., HARJUS
CONSTRUCTION LTD., and 1507718 B.C. LTD.

RESPONDENTS

NOTICE OF APPLICATION

NORTON ROSE FULBRIGHT CANADA LLP

Barristers & Solicitors
1800 – 510 West Georgia Street
Vancouver, BC V6B 0M3
Telephone: (604) 687-6575
Attention: Katie Mak

KGM/AP

Matter# 1001352818