



COURT FILE NUMBER 1803 - 09581

COURT COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE EDMONTON

PLAINTIFF BANK OF MONTREAL

DEFENDANT LADACOR AMS LTD., NOMADS PIPELINE CONSULTING LTD., 2367147 ONTARIO INC., and DONALD KLISOWSKY

DOCUMENT **AFFIDAVIT (Confirming Discharge of Receiver)**

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File Ref.: 99766/12

AFFIDAVIT OF OREST KONOWALCHUK

Sworn on ~~April 11~~, 2021

May

I, Orest Konowalchuk, of the City of Calgary, in the Province of Alberta, **MAKE OATH AND SAY THAT:**

1. I am a Licenced Insolvency Trustee, and a Senior Vice President with Alvarez & Marsal Canada Inc., which is the Court-appointed receiver and manager (the "**Receiver**") of the undertaking, property and assets of Ladacor AMS Ltd., Nomads Pipeline Consulting Ltd. and 2367147 Ontario Inc. (collectively, the "**Debtors**").

2. Pursuant to the Order granted by the Honourable Justice J.E. Topolniski of the Court of Queen's Bench of Alberta (the "**Court**") dated May 18, 2018, Alvarez & Marsal Canada Inc. was appointed as the Receiver over the Debtors.

3. Pursuant to an Order (Approval of Receiver's and Receiver's Counsel's Final Taxation Period Billings, Forecast R&D, Forecast Fees and Costs and Discharge of Receiver, Among Other Relief) granted by the Honourable Justice R.A. Graesser dated March 11, 2020 (the "**Discharge**")

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Order"), the Court approved the discharge of the Receiver, subject to the filing an Affidavit in the within form confirming that the Receiver had completed all other administrative activities required to complete its administration of the Debtors' receivership proceedings.

4. This will confirm that the Receiver has completed all other activities required to complete its administration of the Debtors' receivership proceedings.

5. I make this Affidavit further to the requirements of the Discharge Order, and understand that upon the filing of this Affidavit, Alvarez & Marsal Canada Inc. will be fully and finally discharged from its capacity as the Receiver of the Debtors.

6. I make this Affidavit for no other or improper purpose.

SWORN BEFORE ME at Calgary,
Alberta, this 11 day of May, 2021.

Maggie Grose
Commissioner for Oaths in and for the
Province of Alberta

OREST KONOWALCHUK

Maggie Grose, a Commissioner for Oaths
in and for the Province of Alberta.
Commission expires January 17, 2023
Appointee # 0738957