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October 2, 2018

**VIA HAND DELIVERY**

Reference: 99766/12

The Honourable Madam Justice D.L. Shelley  
Court of Queen's Bench  
Edmonton Law Courts  
1A Sir Winston Churchill Square  
Edmonton, AB T5J 0R2

**RE: *Bank of Montreal v. Ladacor AMS Ltd., Nomads Pipeline Consulting Ltd., 2367147 Ontario Inc., and Donald Klisowsky Queen's Bench Action No. 1803-09581***

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My Lady:

Further to our correspondence of October 1, 2018 and our application before you (currently scheduled on October 10, 2018 at 10:00 a.m. for 2 hours) for the approval of an auction services and liquidation agreement, possible interim distribution of funds, approval of steps taken in receivership to date, and paying funds into Court to discharge certain lien claims (or having certain lien claims declared invalid and discharged), please find enclosed the following filed materials:

1. Application of the Receiver filed October 2, 2018;
2. First Report of Alvarez & Marsal Canada Inc., the court appointed receiver and manager of Ladacor et al. filed October 2, 2018; and
3. Confidential Appendices 1 and 2 to the First Report of the Receiver (provided to your assistant via e-mail).

If you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

  
Ryan Zahara  
RYZ/lf

c: Commercial Coordinator  
Service List

31387880.1

**Schedule "D"**

**Service List**

(see attached)

COURT FILE NUMBER 1803-09581

COURT COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE EDMONTON

APPLICANTS BANK OF MONTREAL

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

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