

COURT FILE NUMBER 2101-02279 102991
COURT COURT OF QUEEN'S BENCH
OF ALBERTA Justice Johnston
JUDICIAL CENTRE CALGARY COM
MATTER IN THE MATTER OF THE RECEIVERSHIP OF ALTER NRG
CORP. Oct 22, 2021



IN THE MATTER OF SECTION 85 OF THE CIVIL
ENFORCEMENT ACT, RSA 2000, c C-15



-and-

IN THE MATTER OF SECTION 13(2) OF THE JUDICATURE
ACT, RSA 2000, c J-2

APPLICANT MNP LTD.

DOCUMENT **AFFIDAVIT OF SERVICE**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
MLT AIKINS LLP
2100 Livingston Place
222 - 3rd Avenue S.W.
Calgary, AB T2P 0B4
Solicitors: Ryan Zahara/Catrina J. Webster
Telephone: 403.693.5420/4347
Email: rzahara@mltaikins.com/cwebster@mltaikins.com

File No.: 0021752.00047
Counsel for the Applicant, MNP Ltd.

AFFIDAVIT OF JOY MUTUKU
Sworn October 21, 2021

I, Joy Mutuku, of the City of Calgary, in the Province of Alberta, MAKE OATH AND SAY THAT:

1. I am a Legal Assistant with the law firm of MLT Aikins LLP, counsel for MNP Ltd., in its capacity as Receiver of Alter NRG Corp. Accordingly, I have personal knowledge of the facts and matters deposed to herein, unless those facts and matters are stated to be based upon my information and belief, and, in which case, I believe those facts and matters to be true.

UNFILED APPLICATION MATERIALS

2. On October 13, 2021, MLT Aikins LLP caused to be served upon the Service List, Alter NRG Corp., Sunshine Kaidi New Energy Group Ltd., Harvest International New Energy Co. Ltd., Alex Gorodestky, Bruce Leonard, Kenneth Willis, Richard Fish, Danny Hay, Refacture Inc., China Export Import Bank and MNP Ltd., (collectively, the “**Service List**”), with unfiled copies of the following Application Materials by email. Attached hereto and marked as **Exhibit "A"** to this Affidavit is a copy of our service letter and email correspondence dated October 13, 2021 serving the unfiled Application Materials.
 - a) Application for Sale Approval and Claims Process:
 - b) Second Report of the Receiver dated October 12, 2021; and
 - c) WebEx Login information and Notice to Participants(collectively, “the **Application Materials**”).
3. On October 13, 2021, MLT Aikins LLP caused to be served, upon PyroGenesis Canada Inc., Raw Energy Resources Corp., and counsel for U-Thong Plasma Energy Company Limited, Miller Thomson LLP, with unfiled copies of the Application Materials by email. Attached hereto and marked as **Exhibit "B"** to this Affidavit is a copy of our email correspondence dated October 13, 2021.
4. On October 13, 2021, MLT Aikins LLP caused to be served additional unfiled copies of the Application Materials by email, upon counsel for U- Thong Plasma Energy Company Limited, Miller Thomson LLP. Attached hereto and marked as **Exhibit "C"** to this Affidavit is a copy of our email correspondence dated October 13, 2021.

UNFILED BRIEF OF THE RECEIVER

5. On October 14, 2021, MLT Aikins LLP caused to be served upon the Service List, with unfiled copies of the Brief of the Receiver and Appendix of Authorities (collectively, “**Brief of the Receiver**”) by email. Attached hereto and marked as **Exhibit "D"** to this Affidavit is a copy of our service letter and email correspondence dated October 14, 2021.

6. On October 14, 2021, MLT Aikins LLP caused to be served upon PyroGenesis Canada Inc., Miller Thomson LLP, and Raw Energy Resources Corp., with an unfiled copy of the Brief of the Receiver by email. Attached hereto and marked as **Exhibit "E"** to this Affidavit is a copy of the email correspondence dated October 14, 2021.
7. On October 14, 2021, MLT Aikins LLP caused to be served an additional unfiled copy of the Brief of the Receiver, to Miller Thomson LLP, by email. Attached hereto and marked as **Exhibit "F"** to this Affidavit is a copy of our email correspondence dated October 13, 2021.

FILED APPLICATION MATERIALS AND BRIEF OF THE RECIEVER

8. On October 19, 2021, MLT Aikins LLP caused to be served upon the Service List, filed copies of the following Application Materials by email. Attached hereto and marked as **Exhibit "G"** to this Affidavit is a copy of our email correspondence dated October 19, 2021 serving the filed Application Materials.
 - a) Application for Sale Approval and Claims Process, filed on October 13, 2021;
 - b) Second Report of the Receiver, filed on October 13, 2021; and
 - c) Brief of the Receiver, filed on October 15, 2021(collectively, "**Proof of Filing**").
9. On October 19, 2021, MLT Aikins LLP caused to be served upon PyroGenesis Canada Inc., Raw Energy Resources Corp. and counsel for U-Thong Plasma Energy Company Limited, Miller Thomson LLP, Proof of Filing of the Application Materials by email. Attached hereto and marked as **Exhibit "H"** to this Affidavit is a copy of the email correspondence dated October 19, 2021.
10. On October 19, 2021, MLT Aikins LLP caused to be served upon Miller Thomson LLP, additional Proof of Filing of the Application Materials by email, upon counsel for U-Thong Plasma Energy Company Limited, Miller Thomson LLP. Attached hereto and marked as **Exhibit "I"** to this Affidavit is a copy of our email correspondence dated October 19, 2021.

NOTICE TO THE MEDIA

- 11. On October 8, 2021, I submitted an e-notice of restricted access to the media. Attached hereto and marked as **Exhibit "J"** to this Affidavit is a copy of our Notice to Media of Application to restrict access.

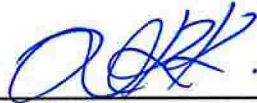
SWORN BEFORE ME at the City of Calgary,)
 in the Province of Alberta, this 21st day of)
 October 2021)

 A Commissioner for Oaths in and for the)
 Province of Alberta)

JOY MUTUKU

NISHALJEET KAUR KHANGURA
A Commissioner for Oaths
in and for the Province of Alberta.
My Commission expires Sept. 27, 2023

**THIS IS EXHIBIT "A" TO THE
AFFIDAVIT OF JOY MUTUKU
SWORN BEFORE ME AT Calgary, Alberta,
This 21st day of October 2021**



A Commissioner for Oaths in and for the Province of Alberta

**NISHALJEET KAUR KHANGURA
A Commissioner for Oaths
in and for the Province of Alberta.
My Commission expires Sept. 27, 20²³**

From: Namuun Erentsen-Ochir
Sent: October 13, 2021 11:55 AM
To: vic.kroeger@mnp.ca; Seamus.Boyle@mnp.ca; Ryan Zahara; Catrina Webster; cbesant@grllp.com; agorodetsky@live.com; brucewleonard78@gmail.com; kenpwillis@telus.net; rfish@cecopower.com; maasen@mross.com; jflanagan@mross.com; dhay@fieldsafesolutions.com; david.mann@dentons.com; afshan.naveed@dentons.com; haddon.murray@gowlingwlg.com; tom.cumming@gowlingwlg.com; angelica.wilamowicz@gowlingwlg.com
Cc: Joy Mutuku
Subject: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action No. 2101-02279
Attachments: Letter to Service List encl. Unfiled Application Materials (October 13, 2021).pdf; Application - Alter NRG re Sale Approval and Claims Process.pdf; Alter NRG Corp. - Receiver's Second Report (Redacted).pdf; WebEx Confirmation - Alter NRG Corp -October 22, 2021.PDF

Please find attached our correspondence.

Thanks,

Namuun Erentsen-Ochir
Legal Assistant, Resource Team
+1 (403) 693-5432 | nerentsen-ochir@mltaikins.com | Calgary

October 13, 2021

Joy Mutuku
Legal Assistant
Direct Line: (403) 693-5403
E-mail: jmutuku@mltaikins.com**TO THE SERVICE LIST****Re: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action No. 2101-02279 (the "Action")**

We are counsel to MNP Ltd., in its capacity as the Court-appointed Receiver in the above-noted Action and write further to the Application scheduled for hearing before the Honourable Madam Justice B.B. Johnston on October 22, 2021 at 2:00 p.m.

Please find enclosed, unfiled copies of materials we intend to rely on, at the hearing of our Application:

1. Application (with copies of the proposed form of Sale Approval and Vesting Order, Sealing Order, and Claims Process Order);
2. Second Report of the Receiver dated October 12, 2021; and
3. WebEx login information.

We have submitted the documents for filing and will provide proof of filing upon receipt.

Yours truly,

MLT AIKINS LLP

Per:


Catrina Webster

c: Ryan Zahara, MLT Aikins LLP (via email)

COURT FILE NUMBER 2101-02279

COURT COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

MATTER IN THE MATTER OF THE RECEIVERSHIP OF ALTER NRG CORP.
IN THE MATTER OF SECTION 85 OF THE *CIVIL ENFORCEMENT ACT*, RSA 2000, c C-15

-and-

IN THE MATTER OF SECTION 13(2) OF THE *JUDICATURE ACT*, RSA 2000, c J-2

APPLICANT MNP LTD.

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 Solicitors: Ryan Zahara
 Telephone: 403.693.5420/4347
 Email: rzahara@mltaikins.com
 Fax Number: 403.508-4349
 File No.: 0021752.00047

Party	Role
<p>MNP LTD. 1500, 640 – 5th Avenue SW Calgary, AB T2P 3G4</p> <p>Victor P. Kroeger Email: vic.kroeger@mpn.ca</p> <p>Seamus Boyle Email: Seamus.Boyle@mpn.ca</p>	<p><i>Counsel for MNP Ltd.</i></p> <p>MLT AIKINS LLP 2100 Livingston Place 222 3 Ave SW Calgary, AB T2P 0B4</p> <p>Ryan Zahara Email: rzahara@mltaikins.com</p> <p>Catrina Webster Email: cwebster@mltaikins.com</p>

<p>ALTER NRG CORP.</p> <p>SUNSHINE KAIDI NEW ENERGY GROUP LTD.</p> <p>HARVEST INTERNATIONAL NEW ENERGY CO. LTD.</p>	<p><i>Counsel for Alter NRG Corp., Sunshine Kaidi New Energy Co. Ltd., and Harvest International New Energy Co. Ltd.</i></p> <p>GARDINER ROBERTS LLP 22 Adelaide Street West Suite 3600 Toronto, ON M5H 4E3</p> <p>Chris Besant Email: cbesant@grllp.com</p>
<p>ALEX GORODETSKY Email: agorodetsky@live.com</p> <p>BRUCE LEONARD Email: bruceleonard78@gmail.com</p> <p>KENNETH WILLIS Email: kenpwillis@telus.net</p> <p>RICHARD FISH Email: rfish@cecopower.com</p>	<p><i>Counsel for Alex Gorodetsky, Bruce Leonard, Kenneth Willis, and Richard Fish</i></p> <p>MCLENNAN ROSS LLP 1900-600 3 Ave SW Calgary, AB T2P 0G5</p> <p>Michael Aasen Email: maasen@mross.com</p> <p>Jamie Flanagan Email: jflanagan@mross.com</p>
<p>DANNY HAY Email: dhay@fieldsafesolutions.com</p>	<p><i>Creditor</i></p>
<p>REFACTURE INC.</p>	<p><i>Counsel for Refacture Inc.</i></p> <p>DENTONS CANADA LLP 850 – 2nd Street SW Calgary, Alberta T2P 0R8</p> <p>David W. Mann Email: david.mann@dentons.com</p> <p>Afshan Naveed Email: afshan.naveed@dentons.com</p>

CHINA EXPORT IMPORT BANK	<p><i>Counsel for China Export Import Bank</i></p> <p>GOWLING WLG First Canadian place 1600-100 King Street West Toronto, ON M5X 1G5</p> <p>Haddon Murray Email: haddon.murray@gowlingwlg.com</p> <p>Tom Cumming Email: tom.cumming@gowlingwlg.com</p> <p>Angelica Wilamowicz Email: angelica.wilamowicz@gowlingwlg.com</p>
---------------------------------	---

**THIS IS EXHIBIT "B" TO THE
AFFIDAVIT OF JOY MUTUKU
SWORN BEFORE ME AT Calgary, Alberta,
This 21st day of October 2021**



A Commissioner for Oaths in and for the Province of Alberta

**NISHALJEET KAUR KHANGURA^A
A Commissioner for Oaths
in and for the Province of Alberta.
My Commission expires Sept. 27, 20²³**

From: Namuun Erentsen-Ochir
Sent: October 13, 2021 12:32 PM
To: pcarabin@pyrogenesis.com; roneil@millerthomson.com; rawenergyresourcescorp@gmail.com; rawenerg@hotmail.com; rpmpmc@hotmail.com
Cc: Catrina Webster; Joy Mutuku; Ryan Zahara
Subject: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action No. 2101-02279
Attachments: Letter to Service List encl. Unfiled Application Materials (October 13, 2021).pdf; Application - Alter NRG re Sale Approval and Claims Process.pdf; Alter NRG Corp. - Receiver's Second Report (Redacted).pdf; WebEx Confirmation - Alter NRG Corp -October 22, 2021.PDF

Please find attached our correspondence.

Thanks,

Namuun Erentsen-Ochir
Legal Assistant, Resource Team
+1 (403) 693-5432 | nerentsen-ochir@mltaikins.com | Calgary

**THIS IS EXHIBIT "C" TO THE
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SWORN BEFORE ME AT Calgary, Alberta,
This 21st day of October 2021**



A Commissioner for Oaths in and for the Province of Alberta

**NISHALJEET KAUR KHANGURA
A Commissioner for Oaths
in and for the Province of Alberta.
My Commission expires Sept. 27, 20~~21~~²³**

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Sent: October 13, 2021 12:43 PM
To: ntaylor-smith@millerthomson.com
Cc: Catrina Webster; Joy Mutuku
Subject: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action No. 2101-02279
Attachments: Letter to Service List encl. Unfiled Application Materials (October 13, 2021).pdf; Application - Alter NRG re Sale Approval and Claims Process.pdf; Alter NRG Corp. - Receiver's Second Report (Redacted).pdf; WebEx Confirmation - Alter NRG Corp -October 22, 2021.PDF

Please find attached our correspondence.

Thanks,

Namuun Erentsen-Ochir
Legal Assistant, Resource Team
+1 (403) 693-5432 | nerentsen-ochir@militaiks.com | Calgary

**THIS IS EXHIBIT "D" TO THE
AFFIDAVIT OF JOY MUTUKU
SWORN BEFORE ME AT Calgary, Alberta,
This 21st day of October 2021**



A Commissioner for Oaths in and for the Province of Alberta

**NISHALJEET KAUR KHANGURA
A Commissioner for Oaths
in and for the Province of Alberta.
My Commission expires Sept. 27, 2023**

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To: vic.kroeger@mnt.ca; Seamus.Boyle@mnt.ca; Ryan Zahara; Catrina Webster; cbesant@grllp.com; agorodetsky@live.com; brucewleonard78@gmail.com; kenpwillis@telus.net; rfish@cecopower.com; maasen@mross.com; jflanagan@mross.com; dhay@fieldsafesolutions.com; david.mann@dentons.com; afshan.naveed@dentons.com; haddon.murray@gowlingwlg.com; tom.cumming@gowlingwlg.com; angelica.wilamowicz@gowlingwlg.com
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Subject: RE: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action No. 2101-02279
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Please find attached our correspondence.

Thanks,

Namuun Erentsen-Ochir
Legal Assistant, Resource Team
+1 (403) 693-5432 | nerentsen-ochir@mltaikins.com | Calgary

From: Namuun Erentsen-Ochir <nerentsen-ochir@mltaikins.com>
Sent: Wednesday, October 13, 2021 11:55 AM
To: vic.kroeger@mnt.ca; Seamus.Boyle@mnt.ca; Ryan Zahara <RZahara@mltaikins.com>; Catrina Webster <cwebster@mltaikins.com>; cbesant@grllp.com; agorodetsky@live.com; brucewleonard78@gmail.com; kenpwillis@telus.net; rfish@cecopower.com; maasen@mross.com; jflanagan@mross.com; dhay@fieldsafesolutions.com; david.mann@dentons.com; afshan.naveed@dentons.com; haddon.murray@gowlingwlg.com; tom.cumming@gowlingwlg.com; angelica.wilamowicz@gowlingwlg.com
Cc: Joy Mutuku <jmutuku@mltaikins.com>
Subject: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action No. 2101-02279

Please find attached our correspondence.

Thanks,

Namuun Erentsen-Ochir
Legal Assistant, Resource Team
P: +1 (403) 693-5432 | **E:** nerentsen-ochir@mltaikins.com

Visit our [COVID-19 Resource Centre](#) for help navigating the changing business and legal environment.

MLT Aikins LLP
2100 Livingston Place
222 3rd Ave SW
Calgary, AB T2P 0B4

MLT AIKINS

October 14, 2021

Joy Mutuku
Legal Assistant
Direct Line: (403) 693-5403
E-mail: jmutuku@mltaikins.com**TO THE SERVICE LIST****Re: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action
No. 2101-02279 (the "Action")**

We are counsel to MNP Ltd., in its capacity as the Court-appointed Receiver in the above-noted Action and write further to the Application scheduled for hearing before the Honourable Madam Justice B.B. Johnston on October 22, 2021 at 2:00 p.m.

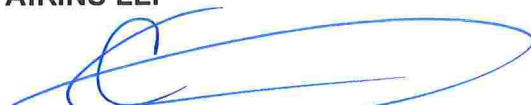
Please find enclosed, the Brief of the Receiver we intend to rely on, at the hearing of our Application.

We have submitted the documents for filing and will provide proof of filing upon receipt.

Yours truly,

MLT AIKINS LLP

Per:



Catrina Webster

c: Ryan Zahara, MLT Aikins LLP (via email)

COURT FILE NUMBER 2101-02279

COURT COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

MATTER IN THE MATTER OF THE RECEIVERSHIP OF ALTER NRG CORP.
IN THE MATTER OF SECTION 85 OF THE *CIVIL ENFORCEMENT ACT*, RSA 2000, c C-15

-and-

IN THE MATTER OF SECTION 13(2) OF THE *JUDICATURE ACT*, RSA 2000, c J-2

APPLICANT MNP LTD.

DOCUMENT

SERVICE LIST

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

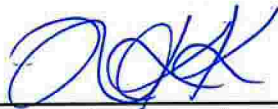
MLT AIKINS LLP
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Fax Number: 403.508-4349
File No.: 0021752.00047

Party	Role
<p>MNP LTD. 1500, 640 – 5th Avenue SW Calgary, AB T2P 3G4</p> <p>Victor P. Kroeger Email: vic.kroeger@mnp.ca</p> <p>Seamus Boyle Email: Seamus.Boyle@mnp.ca</p>	<p><i>Counsel for MNP Ltd.</i></p> <p>MLT AIKINS LLP 2100 Livingston Place 222 3 Ave SW Calgary, AB T2P 0B4</p> <p>Ryan Zahara Email: rzahara@mltaikins.com</p> <p>Catrina Webster Email: cwebster@mltaikins.com</p>

<p>ALTER NRG CORP.</p> <p>SUNSHINE KAIDI NEW ENERGY GROUP LTD.</p> <p>HARVEST INTERNATIONAL NEW ENERGY CO. LTD.</p>	<p><i>Counsel for Alter NRG Corp., Sunshine Kaidi New Energy Co. Ltd., and Harvest International New Energy Co. Ltd.</i></p> <p>GARDINER ROBERTS LLP 22 Adelaide Street West Suite 3600 Toronto, ON M5H 4E3</p> <p>Chris Besant Email: cbesant@grllp.com</p>
<p>ALEX GORODETSKY Email: agorodetsky@live.com</p> <p>BRUCE LEONARD Email: bruceleonard78@gmail.com</p> <p>KENNETH WILLIS Email: kenpwillis@telus.net</p> <p>RICHARD FISH Email: rfish@cecopower.com</p>	<p><i>Counsel for Alex Gorodetsky, Bruce Leonard, Kenneth Willis, and Richard Fish</i></p> <p>MCLENNAN ROSS LLP 1900-600 3 Ave SW Calgary, AB T2P 0G5</p> <p>Michael Aasen Email: maasen@mross.com</p> <p>Jamie Flanagan Email: jflanagan@mross.com</p>
<p>DANNY HAY Email: dhay@fieldsafesolutions.com</p>	<p><i>Creditor</i></p>
<p>REFACTURE INC.</p>	<p><i>Counsel for Refacture Inc.</i></p> <p>DENTONS CANADA LLP 850 – 2nd Street SW Calgary, Alberta T2P 0R8</p> <p>David W. Mann Email: david.mann@dentons.com</p> <p>Afshan Naveed Email: afshan.naveed@dentons.com</p>

CHINA EXPORT IMPORT BANK	<p><i>Counsel for China Export Import Bank</i></p> <p>GOWLING WLG First Canadian place 1600-100 King Street West Toronto, ON M5X 1G5</p> <p>Haddon Murray Email: haddon.murray@gowlingwlg.com</p> <p>Tom Cumming Email: tom.cumming@gowlingwlg.com</p> <p>Angelica Wilamowicz Email: angelica.wilamowicz@gowlingwlg.com</p>
---------------------------------	---

**THIS IS EXHIBIT "E" TO THE
AFFIDAVIT OF JOY MUTUKU
SWORN BEFORE ME AT Calgary, Alberta,
This 21st day of October 2021**



A Commissioner for Oaths in and for the Province of Alberta

**NISHALJEET KAUR KHANGURA
A Commissioner for Oaths
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My Commission expires Sept. 27, 20~~21~~²³**

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Please find attached our correspondence.

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Legal Assistant, Resource Team
P: +1 (403) 693-5432 | **E:** nerentsen-ochir@mltaikins.com

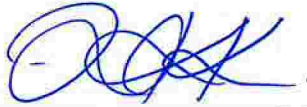
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Calgary, AB T2P 0B4

MLT AIKINS

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Subject: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action No. 2101-02279

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Legal Assistant, Resource Team
P: +1 (403) 693-5432 | **E:** nerentsen-ochir@mltaikins.com

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222 3rd Ave SW
Calgary, AB T2P 0B4

MLT AIKINS

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**NISHALJEET KAUR KHANGURA
A Commissioner for Oaths
in and for the Province of Alberta.
My Commission expires Sept. 27, 20**23****

From: Namuun Erentsen-Ochir
Sent: October 19, 2021 10:27 AM
To: vic.kroeger@mnt.ca; Seamus.Boyle@mnt.ca; Ryan Zahara; Catrina Webster; cbesant@grllp.com; agorodetsky@live.com; brucewleonard78@gmail.com; kenpwillis@telus.net; rfish@cecopower.com; maasen@mross.com; jflanagan@mross.com; dhay@fieldsafesolutions.com; david.mann@dentons.com; afshan.naveed@dentons.com; haddon.murray@gowlingwlg.com; tom.cumming@gowlingwlg.com; angelica.wilamowicz@gowlingwlg.com
Cc: Joy Mutuku
Subject: RE: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action No. 2101-02279
Attachments: Application for Sale Approval and Claims Process - Alter NRG Corp. (Filed October 13, 2021).pdf; Second Report of the Receiver - Alter NRG Corp. (Filed October 13, 2021).pdf; Brief re Alter NRG Corp. - Sale Approval, Claims Process, and Sealing Order (Filed October 15, 2021).pdf

Good Morning,

Please find the attached filed documents.

Thanks,

Namuun Erentsen-Ochir
Legal Assistant, Resource Team
+1 (403) 693-5432 | nerentsen-ochir@mltaikins.com | Calgary

From: Namuun Erentsen-Ochir <nerentsen-ochir@mltaikins.com>
Sent: Thursday, October 14, 2021 4:05 PM
To: vic.kroeger@mnt.ca; Seamus.Boyle@mnt.ca; Ryan Zahara <RZahara@mltaikins.com>; Catrina Webster <cwebster@mltaikins.com>; cbesant@grllp.com; agorodetsky@live.com; brucewleonard78@gmail.com; kenpwillis@telus.net; rfish@cecopower.com; maasen@mross.com; jflanagan@mross.com; dhay@fieldsafesolutions.com; david.mann@dentons.com; afshan.naveed@dentons.com; haddon.murray@gowlingwlg.com; tom.cumming@gowlingwlg.com; angelica.wilamowicz@gowlingwlg.com
Cc: Joy Mutuku <jmutuku@mltaikins.com>
Subject: RE: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action No. 2101-02279

Please find attached our correspondence.

Thanks,

Namuun Erentsen-Ochir
Legal Assistant, Resource Team
+1 (403) 693-5432 | nerentsen-ochir@mltaikins.com | Calgary

From: Namuun Erentsen-Ochir <nerentsen-ochir@mltaikins.com>
Sent: Wednesday, October 13, 2021 11:55 AM
To: vic.kroeger@mnt.ca; Seamus.Boyle@mnt.ca; Ryan Zahara <RZahara@mltaikins.com>; Catrina Webster <cwebster@mltaikins.com>; cbesant@grllp.com; agorodetsky@live.com; brucewleonard78@gmail.com; kenpwillis@telus.net; rfish@cecopower.com; maasen@mross.com; jflanagan@mross.com; dhay@fieldsafesolutions.com; david.mann@dentons.com; afshan.naveed@dentons.com;

haddon.murray@gowlingwlg.com; tom.cumming@gowlingwlg.com; angelica.wilamowicz@gowlingwlg.com

Cc: Joy Mutuku <jmutuku@mltaikins.com>

Subject: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action No. 2101-02279

Please find attached our correspondence.

Thanks,

Namuun Erentsen-Ochir

Legal Assistant, Resource Team

P: +1 (403) 693-5432 | **E:** nerentsen-ochir@mltaikins.com

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MLT Aikins LLP

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Calgary, AB T2P 0B4

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**THIS IS EXHIBIT "H" TO THE
AFFIDAVIT OF JOY MUTUKU
SWORN BEFORE ME AT Calgary, Alberta,
This 21st day of October 2021**



A Commissioner for Oaths in and for the Province of Alberta

**NISHALJEET KAUR KHANGURA
A Commissioner for Oaths
in and for the Province of Alberta.
My Commission expires Sept. 27, 20²³**

Joy Mutuku

From: Namuun Erentsen-Ochir
Sent: October 19, 2021 10:28 AM
To: pcarabin@pyrogenesis.com; roneil@millerthomson.com; rawenergyresourcescorp@gmail.com; rawenerg@hotmail.com; rpmpmc@hotmail.com
Cc: Catrina Webster; Joy Mutuku; Ryan Zahara
Subject: RE: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action No. 2101-02279
Attachments: Application for Sale Approval and Claims Process - Alter NRG Corp. (Filed October 13, 2021).pdf; Second Report of the Receiver - Alter NRG Corp. (Filed October 13, 2021).pdf; Brief re Alter NRG Corp. - Sale Approval, Claims Process, and Sealing Order (Filed October 15, 2021).pdf

Good Morning,

Please find the attached filed documents.

Thanks,

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Legal Assistant, Resource Team
+1 (403) 693-5432 | nerentsen-ochir@mltaikins.com | Calgary

From: Namuun Erentsen-Ochir <nerentsen-ochir@mltaikins.com>
Sent: Thursday, October 14, 2021 4:06 PM
To: pcarabin@pyrogenesis.com; roneil@millerthomson.com; rawenergyresourcescorp@gmail.com; rawenerg@hotmail.com; rpmpmc@hotmail.com
Cc: Catrina Webster <cwebster@mltaikins.com>; Joy Mutuku <jmutuku@mltaikins.com>; Ryan Zahara <RZahara@mltaikins.com>
Subject: RE: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action No. 2101-02279

Please find attached our correspondence.

Thanks,

Namuun Erentsen-Ochir
Legal Assistant, Resource Team
P: +1 (403) 693-5432 | **E:** nerentsen-ochir@mltaikins.com

From: Namuun Erentsen-Ochir <nerentsen-ochir@mltaikins.com>
Sent: Wednesday, October 13, 2021 12:32 PM
To: pcarabin@pyrogenesis.com; roneil@millerthomson.com; rawenergyresourcescorp@gmail.com; rawenerg@hotmail.com; rpmpmc@hotmail.com
Cc: Catrina Webster <cwebster@mltaikins.com>; Joy Mutuku <jmutuku@mltaikins.com>; Ryan Zahara <RZahara@mltaikins.com>
Subject: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action No. 2101-02279

Please find attached our correspondence.

Thanks,

Namuun Erentsen-Ochir
Legal Assistant, Resource Team
P: +1 (403) 693-5432 | **E:** nerentsen-ochir@mltaikins.com

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Calgary, AB T2P 0B4



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**THIS IS EXHIBIT "I" TO THE
AFFIDAVIT OF JOY MUTUKU
SWORN BEFORE ME AT Calgary, Alberta,
This 21st day of October 2021**



A Commissioner for Oaths in and for the Province of Alberta

**NISHALJEET KAUR KHANGURA
A Commissioner for Oaths
in and for the Province of Alberta.
My Commission expires Sept. 27, 20²³**

Joy Mutuku

From: Namuun Erentsen-Ochir
Sent: October 19, 2021 10:30 AM
To: ntaylor-smith@millerthomson.com
Cc: Catrina Webster; Joy Mutuku
Subject: RE: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action No. 2101-02279
Attachments: Application for Sale Approval and Claims Process - Alter NRG Corp. (Filed October 13, 2021).pdf; Second Report of the Receiver - Alter NRG Corp. (Filed October 13, 2021).pdf; Brief re Alter NRG Corp. - Sale Approval, Claims Process, and Sealing Order (Filed October 15, 2021).pdf

Good Morning,

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+1 (403) 693-5432 | nerentsen-ochir@mltaikins.com | Calgary

From: Namuun Erentsen-Ochir <nerentsen-ochir@mltaikins.com>
Sent: Thursday, October 14, 2021 4:07 PM
To: ntaylor-smith@millerthomson.com
Cc: Catrina Webster <cwebster@mltaikins.com>; Joy Mutuku <jmutuku@mltaikins.com>
Subject: RE: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action No. 2101-02279

Please find attached our correspondence.

Thanks,

Namuun Erentsen-Ochir
Legal Assistant, Resource Team
P: +1 (403) 693-5432 | **E:** nerentsen-ochir@mltaikins.com

From: Namuun Erentsen-Ochir <nerentsen-ochir@mltaikins.com>
Sent: Wednesday, October 13, 2021 12:43 PM
To: ntaylor-smith@millerthomson.com
Cc: Catrina Webster <cwebster@mltaikins.com>; Joy Mutuku <jmutuku@mltaikins.com>
Subject: In the matter of the Receivership of Alter NRG Corp.; Court of Queen's Bench Action No. 2101-02279

Please find attached our correspondence.

Thanks,

Namuun Erentsen-Ochir
Legal Assistant, Resource Team
P: +1 (403) 693-5432 | **E:** nerentsen-ochir@mltaikins.com

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**THIS IS EXHIBIT "J" TO THE
AFFIDAVIT OF JOY MUTUKU
SWORN BEFORE ME AT Calgary, Alberta,
This 21st day of October 2021**



A Commissioner for Oaths in and for the Province of Alberta

**NISHALJEET KAUR KHANGURA
A Commissioner for Oaths
in and for the Province of Alberta.
My Commission expires Sept. 27, 20~~21~~²³**



SUCCESS

YOUR SUBMISSION OF NOTICE TO MEDIA OF APPLICATION TO RESTRICT ACCESS HAS BEEN SUCCESSFULLY SUBMITTED

- You will receive a copy of the notice within 24 hrs of submission as distribution is not automatic.
- As proof that you have given the required notice, you are required to present a print copy of the e-mail to the Clerk.





NOTICE TO MEDIA OF APPLICATION TO RESTRICT ACCESS

Complete this form to provide notice of your application to the media. Notice to media is required for all applications for a discretionary publication ban or access restriction. The subject of your application is protected by a publication ban, pending the Court's hearing of the application.

- For civil and family matters, notice must be submitted 5 days before the hearing.
- For criminal matters, notice must be submitted 7 days before the hearing.

You will receive a copy of the notice within 24 hrs of submission as distribution is not automatic.

Only press the SUBMIT button once.

As proof that you have given the required notice, you are required to present a print copy of the e-mail to the Clerk.

Note: If you are not redirected to a success page or get a 500 error, please check the text in the form fields for unexpected characters / text that may come from copy and pasting and try again. If you continue to have problems please let us know by submitting Website feedback.

DETAILS OF HEARING

Court File Number

2101-02279

Plaintiff Name(s)

MNP LTD.

Name (s) of Accused(s), Defendant(s), Respondent(s)

Joy Mutuku



COURT OF QUEEN'S
BENCH OF ALBERTA

Court Location



Calgary



Court Date and Time

22-Oct-2021 02:00 PM



DETAILS OF APPLICATION

Applicant Type

Other



Applicant's Name

MNP Ltd., in its capacity as the Court-appointed receiver of Alter NRG Co

Applicant's Lawyer

MLT AIKINS LLP- RYAN ZAHARA/CATRINA WEBSTER

Email Address

jmutuku@mltaikins.com

Details of restriction applied for

Certain materials and reports in the matter are confidential and subject to a sealing Order. The Confidential materials contain confidential information with respect to Purchase Agreements, proposed purchase price for other orders made for the debtors property by other interested purchasers, as well as information with respect to the Appraisal obtained regarding the appraised value of the Respondent's property. The Confidential materials thus contain commercially sensitive information and documentation. There will be a negative impact and significant potential prejudice to stakeholders in the event such confidential information and documentation were disclosed to the public and the transaction contemplated by the Purchase Agreement were to not close and the sales process regarding the sale of the Respondent's property were resumed.

Specify whether you seek a remedy under a statute, or are relying on the court's common law powers.

Examples:



COURT OF QUEEN'S
BENCH OF ALBERTA

- I am applying for a publication ban on my name under section 486.5 of the Criminal Code.
- I am applying to close the courtroom for a private hearing under Section ___ of the Criminal Code.
- I am applying for a publication ban on all of the evidence under a judge's common law powers.

SUBMIT FORM

SUBMIT

