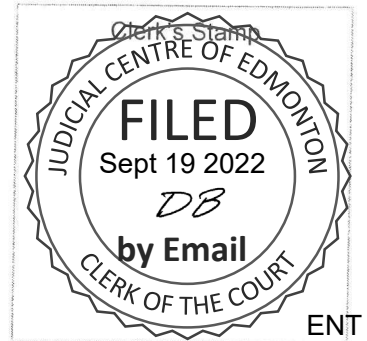


COURT FILE NUMBER 2103 00842
COURT COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE EDMONTON
PLAINTIFF ERAN GURVICH, IN HIS CAPACITY AS ENFORCING AGENT FOR BALRAJ BRAR, MARK VAN BOMMEL, WILSON LEE, DARYL ROITMAN, EDWARD TAN AND ANG FC LTD.

DEFENDANT INTELIFE LP AND INTELIFE GP LTD.

DOCUMENT **APPLICATION**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
OGILVIE LLP
Barristers & Solicitors
1400, 10303 Jasper Avenue
Edmonton, AB T5J 3N6
Kentigern A. Rowan, Q.C.
Phone: (780) 429-6236
Fax: (780) 429-4453
File No. 41087.19



invoice#E92206 \$50

NOTICE TO THE RESPONDENT:

This application is made against you. You are the Respondent.

You have the right to state your side of this matter before the Court.

To do so, you must be in Court when the application is heard as shown below:

Date: September 28, 2022

Time: 2:00 p.m.

Where: Law Courts Building, Edmonton, Alberta, Via Webex, Virtual Courtroom 86

Before: Mr. Justice J.S. Little

Go to the end of this document to see what you can do and when you must do it.

Remedy Sought:

1. An Order abridging the time for service of notice of this Application and supporting materials and deeming service good and sufficient.

2. An Order substantially in the form attached hereto as Schedule "A" providing for, *inter alia*, the discharge of MNP Ltd. ("MNP") as Receiver (the "Receiver") of Intelife (as that terms is hereinafter defined).
3. Such further and other Orders as this Honourable Court may direct.

Grounds for Making this Application:

4. By Order of this Honourable Court granted in these proceedings on January 19, 2021, MNP Ltd. was appointed Receiver, without security, of all of the current and future assets, undertakings and property of every nature and kind whatsoever and wherever situated (including all of the proceeds thereof) (the "Property") of Intelife LP ("ILP") and Intelife GP Ltd. ("IGP").
5. By Order of this Honourable Court granted in these proceedings on February 1, 2021, MNP Ltd. was appointed Receiver, without security, of the Property of Intelife Financial Corp. ("IFC") and Intelife Security & Automation Ltd. ("ISA"). (ILP, IGP, IFC and ISA are hereinafter collectively referred to as "Intelife").
6. The Receiver has completed disposition of all of the assets of Intelife.
7. The Receiver is applying for its discharge.

Material or evidence to be relied on:

8. The Affidavits and Reports of the Receiver filed with this Honourable Court including, but not limited to, the Ninth Report of the Receiver.
9. The Affidavit of Karen Aylward, filed in support of this Application.

Applicable Rules:

10. N/A.

Applicable Acts and Regulations:

11. N/A.

Any irregularity complained of or objection relied upon:

12. None.

How the Application is proposed to be heard or considered:

13. Before the presiding Mr. Justice J.S. Little, via Webex at the Virtual Courtroom as set out on page 1 of this Application Notice.

WARNING

If you do not come to Court either in person or by your lawyer, the Court may give the Applicant what is wants in your absence. You will be bound by any order that the Court makes. If you want to take part in this Application, you or your lawyer must attend in Court on the date and at the time shown in the beginning of the form. If you intend to rely on an Affidavit or other evidence when the Application is heard or considered, you must reply by giving reasonable notice of the material to the Applicant.

SCHEDULE "A"

COURT FILE NUMBER 2103 00842

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE EDMONTON

PLAINTIFF ERAN GURVICH, IN HIS CAPACITY AS ENFORCING AGENT FOR BALRAJ BRAR, MARK VAN BOMMEL, WILSON LEE, DARYL ROITMAN, EDWARD TAN AND ANG FC LTD.

DEFENDANTS INTELIFE LP AND INTELIFE GP LTD.

DOCUMENT **ORDER FOR FINAL DISTRIBUTION, APPROVAL OF RECEIVER'S FEES AND DISBURSEMENTS, APPROVAL OF RECEIVER'S ACTIVITIES AND DISCHARGE OF RECEIVER**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT **OGILVIE LLP**
Barristers & Solicitors
1400, 10303 Jasper Avenue
Edmonton AB T5J 3N6
Attention: Kentigern A. Rowan, Q.C.
Phone: 780-429-6236
Fax: 780-429-4453
File No.: 41087.19/KAR

**Service will be accepted by delivery or fax.
No other form of service will be accepted.**

DATE ON WHICH ORDER WAS PRONOUNCED: September 28, 2022

LOCATION WHERE ORDER WAS PRONOUNCED: Edmonton, Alberta

NAME OF JUSTICE WHO MADE THIS ORDER: The Honourable Mr. Justice J.S. Little

UPON THE APPLICATION of MNP LTD. in its capacity as the Court-appointed receiver (the "Receiver") of the undertaking, property and assets of Intelife LP, Intelife GP Ltd., Intelife Financial Corp. and Intelife Security and Automation Ltd. (collectively, the "Debtor") for an Order for the final distribution of proceeds, approval of the Receiver's fees and disbursements, approval of the Receiver's activities and discharge of the Receiver; AND UPON hearing read the Receiver's Reports to this Honourable Court including, but not limited to, the Receiver's Ninth Report dated September 19, 2022 (the "Receiver's Ninth Report"); AND UPON reviewing the Order consented to by counsel for the Receiver, counsel for Bojan Konstandinovic ("Bojan") and counsel for the

Dealers (as that term is defined in the said Order) which Order was granted by this Honourable Court on July 13, 2022 (the "July 13, 2022 Consent Order"); AND UPON noting that the Records (as that term is defined in the Receiver's Ninth Report) may contain records of subsidiaries or related parties to the Debtor; AND UPON reading the Affidavit of Service of notice of this Application; AND UPON hearing counsel for the Receiver and counsel for such other interested parties as appeared on this Application; AND UPON being satisfied that it is appropriate to do so, IT IS HEREBY ORDERED AND ADJUDGED THAT:

SERVICE

1. Service of notice of this application and supporting materials is hereby declared to be good and sufficient, and no other person is required to have been served with notice of this application, and time for service of this application is abridged to that actually given.

ACCOUNTS

2. The Receiver's accounts for fees and disbursements, as set out in the Receiver's Ninth Report are hereby approved without the necessity of a formal passing of its accounts.
3. The accounts of the Receiver's legal counsel, Ogilvie LLP, for its fees and disbursements, as set out in the Receiver's Ninth Report are hereby approved without the necessity of a formal assessment of its accounts.
4. The Receiver and the Receiver's counsel are hereby authorized to issue further accounts to conclusion of this matter in the aggregate amount not to exceed ten thousand dollars (\$10,000.00) and to pay the said accounts from the Account Holdback provided for in this Order and without the need for further taxation or approval of the accounts.
5. The administrative charge in favour of the Receiver and provided for in the Orders appointing the Receiver, as amended, be and is hereby increased to the amount of \$610,000.00.

RECEIVER'S ACTIVITIES

6. The Receiver's activities as set out in the Receiver's Ninth Report and in all of its other reports filed herein, and the Statement of Receipts and Disbursements as attached to the Receiver's Ninth Report, are hereby ratified and approved.
7. The Receiver is hereby authorized to cancel the monitoring services related to the Equity Tech Accounts (as that term is defined in the Receiver's Ninth Report).
8. The Receiver is not required to give any further notice to Equity Tech or any customers associated with any Equity Tech Accounts before proceeding to cancel the monitoring services with respect thereto.

9. The Receiver is not required to and is released from any obligation to take further steps to compel the Dealers (as that term is defined in the July 13, 2022 Consent Order) to provide the accounting as directed in the July 13, 2022 Consent Order.
10. Notwithstanding anything contained in this Order, Bojan Konstandinovic ("Bojan") shall have the right to bring such Applications as he deems necessary to compel the provision by the Dealers of the accounting as directed by the July 13, 2022 Consent Order.

DISTRIBUTIONS

11. From the funds held by the Receiver as a result of this Receivership, the Receiver is hereby authorized to withhold the following amounts for the following purposes:
 - (a) \$10,000.00 as the account holdback to pay the accounts of the Receiver and the Receiver's counsel as authorized pursuant to this Order (the "Account Holdback");
 - (b) \$3,000.00 as an expense holdback to pay any expenses of this Receivership estate to the conclusion and discharge of the Receiver (the "Expense Holdback")
12. The Receiver be and is hereby authorized and directed to pay to Service Canada the final WEPPA payment (as that term is defined in the Receiver's Ninth Report) in the sum of \$2,000.00.
13. The Receiver be and is hereby authorized to pay any expenses of this Receivership estate not yet paid or incurred prior to its discharge, from the Expense Holdback.
14. The Receiver be and is hereby authorized to distribute to the Gurvich Group (as that term is defined in the Order of this Honourable Court dated July 13, 2022) the remaining amounts held to the credit of this Receivership in the amount of \$39,371.12.
15. To the extent that the Account Holdback and the Expense Holdback are not used to make payments as authorized by this Order within sixty (60) days of the date of this Order, the Receiver shall pay the remaining balances of the holdbacks to the Gurvich Group.

DISCHARGE

16. The Receiver is authorized to provide notice to the Directors of the Debtor to, within thirty (30) days of giving of the notice, retrieve the Records in the possession of the Receiver and should the directors of the Debtor fail to do so within the said thirty (30) day period, the Receiver be and is hereby authorized to destroy the Records in its possession.
17. On the evidence before the Court, the Receiver has satisfied its obligations under and pursuant to the terms of the Orders granted in the within proceedings up to and including the date hereof, and the Receiver shall not be liable for any act or omission on its part

including, without limitation, any act or omission pertaining to the discharge of its duties in the within proceedings, save and except for any liability arising out of any in fraud, gross negligence or willful misconduct on the part of the Receiver, or with leave of the Court. Subject to the foregoing any claims against the Receiver in connection with the performance of its duties are hereby stayed, extinguished and forever barred.

18. No action or other proceedings shall be commenced against the Receiver in any way arising from or related to its capacity or conduct as Receiver, except with prior leave of this Court on Notice to the Receiver, and upon such terms as this Court may direct.
19. Upon the Receiver filing with the Clerk of the Court a sworn Affidavit of a licensed Trustee employed by the Receiver confirming that:

- (a) All matters and actions as directed by this Order including, but not limited to the payment and application of funds as provided for in paragraphs 11 to 14 of this Order have been completed; and

- (b) All other matters to complete the administration of this Estate has been completed,

then the Receiver shall be discharged as Receiver of the Debtor, provided however, that notwithstanding its discharge herein (a) the Receiver shall remain Receiver for the performance of such incidental duties as may be required to complete the administration of the receivership herein, and (b) the Receiver shall continue to have the benefit of the provisions of all Orders made in this proceeding, including all approvals, protections and stays of proceedings in favour of the Receiver in its capacity as Receiver.

20. This Order must be served only upon those interested parties attending or represented at the within application and service may be effected by Facsimile, electronic mail, personal delivery or courier. Service is deemed to be effected the next business day following the transmission or delivery of such documents.
21. Service of this Order on any party not attending this application is hereby dispensed with.

Justice of the Court of King's Bench of
Alberta