

# Cassels

June 21, 2021

**Via Courier**

Please see attached Service List

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file # 28677-31

Dear Sirs and Mesdames:

**Re: Court File No. 2101-00809  
*Bank of Montreal v. Metro Paving and Roadbuilding Ltd., et al.*  
Application scheduled for Wednesday, June 30, 2021 at 2:00 PM (the "Application")**

We are counsel to BDO Canada Limited in its capacity as receiver and manager of Metro Paving and Roadbuilding Ltd., Metro Paving Ltd., Metro Pars Corporation and Grasslands of Beiseker Development Corporation (in such capacity, the "Receiver").

Further to the above-referenced matter, please find enclosed for service upon you, copies of the following:

1. Proof of filing of the Second Report of the Receiver, dated May 31, 2021;
2. Proof of filing of the Bench Brief of the Receiver, dated June 3, 2021;
3. Proof of filing of the Book of Authorities;
4. Application which attaches to it as Schedules "A", "B" and "C", respectively, draft copies of forms of an Approval and Vesting Order, Order Approving Interim Distribution, etc. and Sealing Order; and
5. Third Report of the Receiver, dated June 21, 2021.

Proofs of filing in relation to 4 and 5 will follow in due course.

Please be advised that we have also prepared Fee Affidavits for the professional fees of the Receiver and its counsel. Should you require a copy of the same, please contact the writer.

We trust you will find the foregoing and enclosed to be in order.

Yours truly,  
Cassels Brock & Blackwell LLP



Jeffrey Oliver  
Partner  
JO/rk

COURT FILE NUMBER      2101-00809

PLAINTIFF                      BANK OF MONTREAL

DEFENDANTS                 METRO PAVING AND ROADBUILDING LTD., METRO PAVING LTD.,  
METRO PARS CORPORATION and GRASSLANDS OF BEISEKER  
DEVELOPMENT CORPORATION (the “Metro Entities”)

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<b>Eclipse Geomatics &amp; Engineering Ltd.</b> 1530 27 Avenue NE Calgary, AB, T2E 7S6	
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<b>The Village of Hussar</b> Box 100 Hussar, AB, T0J 1S0	Mortgage registrant against Metro Pars Corporation property
<b>Travelers Insurance Company of Canada</b> 165 University Avenue Toronto, ON M5H 3B9	
<b>Zurich Insurance Company Ltd.</b> First Canadian Place 5500, 100 King Street West Toronto, ON M5X 1C9	
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