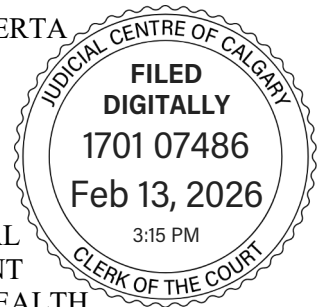


COURT FILE NUMBER 1701-07486
COURT COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY
APPLICANT THE TORONTO-DOMINION BANK
RESPONDENTS RONALD C. WITZKE PROFESSIONAL
DENTAL CORPORATION, MEDIDENT
INNOVATIONS LTD., MEDIDENT HEALTH
CENTRE LTD., DR. R.C. WITZKE
PROFESSIONAL DENTAL CORPORATION,
R.C. WITZKE PROFESSIONAL DENTAL
CORPORATION, RONALD C. WITZKE



DOCUMENT **SECOND REPORT OF THE RECEIVER
BDO CANADA LIMITED
FEBRURARY 13, 2026**

RECEIVER

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**SECOND REPORT OF THE RECEIVER
BDO CANADA LIMITED
FEBRUARY 13, 2026**

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INTRODUCTION

1. On June 1, 2017, the Toronto-Dominion Bank (“**TD**”) sought and obtained a Receivership Order from the Court of Queen’s Bench of Alberta (as it was then) (the “**Court**”) appointing Hardie & Kelly Inc. (“**H&K**”) as receiver (the “**Receiver**”) of the assets, undertakings, and properties of Ronald C. Witzke Professional Dental Corporation (the “**PC**”) and Medident Innovations Ltd. (“**Medident**”).
2. On June 19, 2018, the Receiver filed its first report (the “**First Report**”), and related confidential supplement, seeking, among other things, the approval of a sale transaction in respect of the material assets of Medident which was approved by the Court pursuant to an Order granted on June 27, 2018. This sale was closed by the Receiver on July 18, 2018.
3. On June 27, 2018, TD sought and obtained a further Order from the Court appointing H&K as Receiver of the assets, undertakings, and properties of a related entity, R.C. Witzke Professional Corporation (the “**New PC**”, and collectively with the PC and Medident, the “**Receivership Entities**” or the “**Debtors**”).
4. On July 11, 2018, H&K was appointed as the substitute Licenced Insolvency Trustee (the “**Trustee**”) in respect of the personal bankruptcy estate (the “**Witzke Estate**”) of Ronald Christopher Witzke (“**Dr. Witzke**”). Dr. Witzke was the sole director and shareholder of the PC, the New PC, and Medident, and guarantor of the indebtedness owed to TD in respect of the Receivership Entities, as further detailed herein.
5. On November 28, 2019, H&K, in its capacity as Receiver of both the PC and the New PC, and as the Trustee of the Witzke Estate commenced an action (the “**Conveyance Action**”) against various parties in respect of a conveyance of the dental clinic owned and operated by the PC, the New PC and/or Dr. Witzke, as discussed in further detail herein.
6. On June 30, 2020, pursuant to a merger of H&K with BDO Canada Limited (“**BDO**”), Madam Justice K.M. Horner granted an Order substituting H&K with BDO as Receiver and Trustee, as applicable, with the effect that references to the Receiver and the Trustee herein shall refer to both H&K and BDO in such capacities.

7. The purpose of this report (the “**Second Report**”) is to provide the Court with:
- (a) background information on the Receivership Entities and events leading up to the proceedings;
 - (b) details of the priority / secured creditors as against the Receivership Entities, as well as the unsecured creditors in the Witzke Estate given the interconnectedness of the estates and certain of the relief being sought herein;
 - (c) a summary of the material activities of the Receiver since the First Report;
 - (d) details of the Conveyance Action and the Settlement Agreement (as defined herein) reached to settle the litigation;
 - (e) the Receiver’s assessment and proposed allocation of the Settlement Proceeds (as defined herein) pursuant to the Settlement Agreement;
 - (f) a consolidated statement of the receipts and disbursements in respect of the Receivership Entities and the Witzke Estate (the “**SRD**”);
 - (g) a summary of the professional fees of the Receiver and its legal counsel, Dentons LLP (“**Dentons**”), to date and the estimated professional fees to conclude the receivership administration;
 - (h) the Receiver’s proposed distribution of net proceeds in the receivership proceedings;
 - (i) the Receiver’s proposed destruction of any corporate records; and
 - (j) the Receiver’s request for its discharge.
8. This Second Report, together with other information and filings regarding these proceedings, have been posted on the Receiver’s website at: <https://www.bdo.ca/witzke-et-al>.

TERMS OF REFERENCE

9. In preparing this Second Report, the Receiver has relied upon unaudited financial information contained in the available books and records of the Receivership Entities, information obtained through the Conveyance Action, and discussions with former employees, Dr. Witzke, or former management of the dental clinic, as well as industry experts, among other sources of information (collectively, the “**Information**”).

10. The Receiver has not audited, reviewed, or otherwise attempted to verify the accuracy or completeness of the Information in a manner that would wholly or partially comply with Canadian Auditing Standards pursuant to the Chartered Professional Accountants Handbook. Accordingly, the Receiver expresses no opinion or any other form of assurance in respect of the Information referred to or used in the Second Report.

BACKGROUND

PC

11. The PC is a professional dental corporation incorporated in Alberta in October 2012. The sole director and shareholder is Dr. Witzke.
12. Through the PC, Dr. Witzke, a licensed dentist in Alberta, had operated the dental clinic known as Southside Dental (“**Southside Dental**”) located at the address of 10, 2020 Strachan Road SE, Medicine Hat, Alberta (the “**Southside Premises**”) from its opening in 2013 until around February 2017.
13. The Southside Premises were constructed in 2012. Two licensed dentists initially owned and operated Southside Dental, being Dr. Witzke and another dentist, Dr. Christopher Baba (“**Dr. Baba**”), each through their respective professional corporations. In 2015, Dr. Baba exited the venture and sought to sell his interest in Southside Dental, including his share of the equipment, leasehold improvements, and goodwill (including the Southside Dental tradename), to the PC.
14. Dr. Witzke continued to operate Southside Dental until around February 2017, at which time he incorporated the New PC and began operating Southside Dental through this new professional corporation, while using the PC’s assets, with no consideration paid to the PC.
15. As detailed in the First Report, at the time of the Receiver’s appointment over the PC, the operations of Southside Dental had already been transferred to the New PC.
16. Prior to the transfer of Southside Dental to New PC, the Receiver understands that various staff were employed by the PC to operate Southside Dental. Subsequent to the incorporation of the New PC, the Receiver understands that all employees were transferred from the PC to the New PC.

17. Based on the unaudited financial statements of the PC dated September 30, 2016 (i.e. approximately four months prior to the transfer to the New PC), the assets of the PC included equipment with a net book value of \$329,491 and leasehold improvements with a net book value of \$92,085. The other recorded assets of the PC as of that date included accounts receivable of \$161,684, inventory of \$30,000, prepaid deposits of \$16,401, and an amount due from Medident of \$945,872.
18. With respect to the equipment owned by the PC, this included various dental equipment, office furniture, and computers used in the operations of Southside Dental (the “**Equipment**”).
19. As discussed in the First Report, prior to the Receiver’s appointment over the PC, a five-year lease agreement (the “**Equipment Lease**”) dated February 7, 2017, was executed by Dr. Witzke which required the New PC to, among other things, pay \$3,083 on a monthly basis to the PC for the use of the Equipment. However, the Receiver understands that no lease payments were ever made to the PC under the Equipment Lease.
20. Following the Receiver’s appointment, the Receiver had entered into a custodial agreement (the “**Custodial Agreement**”) with the New PC and Dr. Witzke for the safeguarding and use of the Equipment during an interim period while a new lease agreement could be negotiated and entered into between the parties. However, despite the efforts of the Receiver, no further agreement was ever agreed to, and no compensation was ever paid to the Receiver for the use of the Equipment during the receivership.
21. Additional assets not reflected in the PC’s financial statements, but used in operating Southside Dental, included the Southside Dental trade name, business telephone number, website, and the patient lists associated with the dental practice (collectively, the “**Goodwill**”). At the outset of the receivership, Dr. Witzke informed the Receiver that certain of these assets were owned by him personally (i.e. the Southside Dental tradename, website, and telephone number) and by the New PC (i.e. the patient lists). Accordingly, at the outset of the receivership proceedings there was some uncertainty as to the ultimate ownership interests in the Goodwill.

22. Based on the unaudited financial statements of the PC, the PC reported annual revenues between 2013 and 2016 in the range of \$1.67 million to \$2.03 million, for an average of approximately \$1.82 million over the five years of operations. The Receiver understands that gross revenue is often a metric used to assess the value of a professional dental practice, along with its goodwill.
23. A copy of the PC's unaudited financial statements for 2013 to 2016 are attached hereto as **Appendix "A"**.

New PC

24. The New PC is a professional dental corporation, incorporated in Alberta in January 2017. The sole director and shareholder of New PC is also Dr. Witzke.
25. As indicated above, on or about February 2017, Dr. Witzke began operating Southside Dental through the New PC, while using the assets of the PC, for which no consideration was provided to the PC. The Receiver also understands that employees that were previously employed with the PC were transferred to New PC at that time to continue the operations of Southside Dental.
26. Based on the unaudited balance sheet of the New PC dated December 31, 2017, the listed assets of the New PC included cash of \$32,941, accounts receivable of \$127,877, and due from shareholder / related parties at \$199,595.
27. The unaudited income statement reported gross revenues of \$1.52 million during the eleven-month period ending December 31, 2017. Annualizing this figure over twelve months would amount to approximately \$1.66 million.
28. A copy of the New PC's unaudited 2017 financial statements are attached hereto as **Appendix "B"**.
29. Following the Receiver's appointment over the New PC on June 27, 2018, the Receiver became aware that on or about April 2018, Brian Murray Professional Corporation, operating as Able Dentistry Group, a company controlled by Dr. Brian Murray (collectively, the "**Murray Group**"), with the assistance of Dr. Witzke (through an established numbered company), had begun operating Southside Dental, utilizing the assets of Southside Dental with no consideration ever paid to either the PC or New PC (other than \$5,000 which the Receiver understands was paid for inventory onsite at the time of the asset transfer). This ultimately led to the Conveyance Action.

Medident

30. Medident was incorporated in Alberta on February 26, 2014. Medident was established with the intention of holding assets for use in a dental surgical facility through another entity; however, this surgical facility never became operational.
31. As detailed in the First Report, the Receiver sought and obtained Court approval of the sale of Medident's assets and that transaction subsequently closed on July 18, 2018.

SUMMARY OF CREDITORS

The Receivership Entities

32. The following is a summary of priority and/or secured claims against the Receivership Entities:
 - (a) Canada Revenue Agency (the "CRA") – CRA has claimed the following amounts:
 - i. a deemed trust claim in respect of unpaid source deductions in the amount of \$3,457 against the PC (as there are no amounts owed to CRA for goods and services tax ("GST")); and
 - ii. a deemed trust claim in respect of unpaid source deductions in the amount of \$97,743 against the New PC (as there are no amounts owed to CRA for GST).
 - (b) TD – TD is owed approximately \$2.52 million from the Receivership Entities. To secure the indebtedness owed, TD was granted security over the assets of the PC, the New PC, and Medident. TD registered its security interest in the Personal Property Registry of Alberta (the "PPR") as against all the present and after acquired property of the PC, New PC and Medident, on March 22, 2016, May 8, 2017, and December 11, 2014, respectively. The Receiver's legal counsel has conducted a review of TD's security as against the PC, New PC, and Medident, which has confirmed the security to be valid and enforceable, subject to customary assumptions and qualifications. Dr. Witzke also provided TD with an unlimited personal guarantee with respect to the indebtedness owed to it;

- (c) Chris Baba Professional Corporation – Dr. Baba had registered a writ of enforcement at the PPR on May 4, 2017, as against the PC for amounts totalling approximately \$350,000 relating to a judgment obtained in March 2017. The Receiver understands the judgment stems from a claim relating to the termination of the business relationship between the parties in 2015. In addition, Dr. Baba registered a report of seizure of various assets on May 24, 2017; however, the Receiver was appointed over the PC prior to the completion of the seizure such that the action was stayed. Furthermore, these registrations are no longer appear registered at the PPR. Accordingly, this interest is subordinate to TD’s security interest over the assets of the PC; and
- (d) Related entities – Dr. Witzke, the PC, and another related corporation by the name of Dr. R.C. Witzke Professional Dental Corporation had registered security interests in the PPR on October 18, 2016, in relation to security over all of the assets of Medident; however, these interests are subordinate to the security interests of TD.

- 33. The Receiver notes that it is not aware of any amounts owed to former employees of the PC or the New PC, or to any other potential priority creditors.
- 34. In addition to the above, and as reflected on the SRD, TD has advanced a total of \$60,340 to the Receiver pursuant to various Receiver’s Certificates to fund the receivership proceedings, with this funding holding a priority charge over the assets of the Receivership Entities pursuant to the applicable receivership Orders.
- 35. Taking into consideration the Proposed Distribution (as defined below), TD is expected to suffer a significant shortfall on the amounts owed to it by the Debtors. Accordingly, aside from the distribution to CRA to satisfy its deemed trust claims, there will be no distribution to any other creditors.

The Witzke Estate

- 36. Given the interconnectedness of the various insolvency estates and certain of the relief being sought herein, the Receiver believes it is relevant to set out the known creditors in the Witzke Estate.
- 37. A copy of the Trustee’s claims register (the “**Claims Register**”) is attached as hereto as **Appendix “C”**. The Claims Register identifies the creditors that have filed proofs of claim with the Trustee to date, summarized below:

Creditor	Unsecured Claim	%
TD	\$ 2,539,744	90.81%
CRA	134,169	4.80%
Alberta Justice	70,245	2.51%
Department of National Defence	52,144	1.86%
Manitoba Hydro	496	0.02%
	\$ 2,796,799	100.00%

38. As detailed above, TD is by far the most significant unsecured creditor in the Witzke Estate (with the amount above including its guaranteed indebtedness in respect of the Receivership Entities as well as amounts owed from Dr. Witzke personally), representing approximately 91% of the total proven unsecured claims filed to date.
39. It is also noted that CRA has not filed claims in the Witzke Estate for the potential outstanding director obligations owed in relation to the PC and the New PC, which as discussed above, total approximately \$101,200. Accordingly, if CRA was not paid a portion of its deemed trust as against the PC or the New PC, CRA may submit an unsecured claim in the Witzke Estate.
40. Further, and as reflected in the SRD, TD has advanced a total of \$171,147 to the Trustee to fund certain expenditures and litigation costs in the bankruptcy proceedings, pursuant to a third party guarantee provided to the Trustee.

RECEIVER'S ACTIVITIES

41. The activities of the Receiver in relation to the PC and Medident were detailed in the First Report. At the time of the First Report, it is noted that BDO was not yet appointed as Receiver of the New PC.
42. The Receiver's activities since the First Report have included, among other things:
- (a) closing the transaction for the sale of Medident's assets;
 - (b) with respect to the New PC specifically:
 - i. attending the Southside Premises following the Receiver's appointment to meet with Dr. Witzke and attempt to take possession of the clinic assets (however, as detailed above, at the time of taking possession, the Receiver became aware that the assets had been conveyed to a third party unbeknownst to the Receiver prior to that date);
 - ii. issuing the statutory Notice and Statement of Receiver;

- iii. engaging the former accountant and bookkeeper to complete the 2017 financial statements;
 - iv. requesting and reviewing various operational documentation and information;
 - v. holding various discussions with Dr. Witzke and the Murray Group in relation to the transfer of Southside Dental; and
 - vi. notifying the Alberta Dental Association in relation to the Receiver's appointment over the New PC, that the Receiver was not operating Southside Dental, and that patient information remained with Dr. Witzke;
- (c) obtaining and maintaining an insurance policy with respect to the Equipment of the PC which remained at the Southside Premise (as the Receiver determined that the Equipment should remain at the Southside Premises based on advice from industry experts that these assets would achieve greater value if realized in conjunction with the other clinic assets, including the Goodwill);
 - (d) obtaining an appraisal of the Equipment;
 - (e) engaging Dentons LLP as legal counsel;
 - (f) commencing the Conveyance Action, in conjunction with the Trustee, and entering into the Settlement Agreement;
 - (g) obtaining an independent security opinion in respect of the secured indebtedness of TD as against the assets of the PC, New PC, and Medident;
 - (h) reviewing and assessing the allocation of the Settlement Proceeds under the Settlement Agreement, as further detailed below;
 - (i) corresponding with key stakeholders, including TD and CRA, during the course of the proceedings;
 - (j) preparing this Second Report; and
 - (k) attending to various other administrative items with respect to the administration of the receivership estates.

THE CONVEYANCE ACTION AND SETTLEMENT AGREEMENT

43. As detailed above, following the Receiver's appointment over the New PC, the Receiver became aware that on or about April 2018, the Murray Group, with the assistance of Dr. Witzke, had begun operating a dental practice at Southside Premises for no or inadequate consideration paid to the PC or New PC.
44. As a result, in accordance with paragraphs 3(j) and 3(k) of the Receivership Orders for the PC and the New PC, respectively, and with the support of TD and the approval of the estate inspectors in the Witzke Estate (hereafter referred to as the "**Inspectors**"), BDO, in its capacity as Receiver of the PC and New PC, and in its capacity as the Trustee of the Witzke Estate, commenced the Conveyance Action.
45. A copy of the statement of claim, filed on November 28, 2019 (the "**Statement of Claim**"), by BDO in its various capacities, is attached hereto as **Appendix "D"**. The Statement of Claim further summarizes the chain of events and purported conveyance of Southside Dental. Pursuant to the Statement of Claim, there were various named defendants, including the Murray Group, Dr. Witzke, and other named parties. As set out therein, the Receiver / Trustee sought, among other things, a judgement in the amount of \$1.5 million in relation to the transfer of Southside Dental.
46. As the ownership of certain components of the Goodwill was uncertain at the outset of the proceedings given certain claims made by Dr. Witzke, and given the involvement of the various entities in the conveyance of the clinic assets, the Conveyance Action was commenced by the Receiver and the Trustee to ultimately safeguard the interests of all estates, pending future determination of the ownership of the clinic assets and the Goodwill.
47. Subsequent to the commencement of the Conveyance Action, the Receiver and Trustee, with the assistance of legal counsel, undertook several steps to advance the litigation. These steps included, among other things, conducting and attending various examinations, filing materials with the Court, and bringing an application on June 2, 2023 (the "**Records Application**"), seeking an Order compelling the Murray Group to produce financial and patient records needed to further advance the Conveyance Action.
48. Prior to the release of the Court's decision in respect of the Records Application, the Murray Group, the Receiver, and the Trustee negotiated and entered into a Settlement Agreement (the "**Settlement Agreement**") dated September 19, 2024, resulting in a resolution to the Conveyance Action in exchange for a cash payment to the Receiver and the Trustee (the

“**Settlement Proceeds**”). The Receiver notes that the Settlement Agreement is subject to confidentiality provisions, and therefore the quantum of the Settlement Proceeds is not disclosed in this Second Report. The Receiver notes that the Settlement Proceeds are included within the total realizations by the Receiver as reflected in the SRD attached hereto.

49. The Receiver and Trustee entered into the Settlement Agreement, in consultation with legal counsel, TD, and the Inspectors, for the following primary reasons:

- (a) settling the Conveyance Action provided for an expedient resolution of the litigation, thereby mitigating future costs which were being borne by TD;
- (b) there was no guarantee that continuing to advance the Conveyance Action would have resulted in a more favourable outcome;
- (c) TD, the primary economic stakeholder in the Receivership Entities and the Witzke Estate, as well as the party funding the litigation, was fully supportive of the Settlement Agreement;
- (d) the Inspectors approved by the Settlement Agreement;
- (e) the Receiver was authorized to settle the Conveyance Action pursuant to sections 3(g) and 3(j) of the Receivership Order in respect of the PC and sections 3(k) and 3(j) of the Receivership Order in respect of the New PC; and
- (f) it provided for the disposition of the Equipment owned by the PC which remained at the Southside Premises since the commencement of the receivership proceedings. With respect to the sale of the Equipment as part of the Settlement Agreement, the Receiver notes the following:
 - i. the Equipment remained at the Southside Premises throughout the receivership proceedings, as the Receiver determined that the Equipment (and the clinic assets as a whole) were likely to realize greater value if realized together rather than separately;
 - ii. the sale price for the Equipment was negotiated as part of the broader settlement of the Conveyance Action;
 - iii. the value allocated to the Equipment was supported by an appraisal obtained by the Receiver, which estimated the Equipment’s forced liquidation value at \$149,984 as of February 3, 2021; and

- iv. TD supported the Settlement Agreement despite the significant shortfall anticipated on its security, which included the sale of the Equipment at the allocated price.
50. With respect to the disposition of the Equipment as part of the Settlement Agreement, the Receiver notes that pursuant to paragraph 3(l) of the receivership Order in respect of the PC, the Receiver was authorized to sell property out of the ordinary course without the approval of the Court in respect of any transaction not exceeding \$75,000, provided that the aggregate consideration for all such transactions did not exceed \$150,000, barring which Court approval was required. The Receiver notes that the allocated sale price for the Equipment was above the threshold for one transaction permitted under the Receivership Order, however, for the reasons noted above, and noting that no party was prejudiced by this transaction, it is respectfully seeking the Court's approval of the disposition of the Equipment on a *nunc pro tunc* basis.
51. On January 28, 2025, counsel for the Receiver and Trustee received the Settlement Agreement closing funds, filed the various discontinuances with the Court, and the transaction contemplated by the Settlement Agreement was concluded.

ASSESSMENT AND PROPOSED ALLOCATION OF SETTLEMENT PROCEEDS

52. As detailed above, the Conveyance Action was commenced by both the Receiver and Trustee given the involvement of the various estates in the transfer of Southside Dental, and the uncertainty at the outset regarding certain ownership interests in respect of the Goodwill as set out earlier in this Second Report.
53. The Settlement Agreement provided resolution to the claims advanced in the Conveyance Action in exchange for the Settlement Proceeds. An amount was specifically allocated to the purchase of the Equipment, with the balance of proceeds reflecting the other clinic assets that were transferred.
54. The Receiver has considered the entitlement to the Settlement Proceeds given the creditors in the multiple estates. In this regard, the Receiver has considered, among other things, the financial and other information available, evidence produced through the Conveyance Action, and/or the Receiver's understanding of the events surrounding the transfer of Southside Dental, as well as the impact on creditors. Additionally, the Receiver has also consulted with its legal counsel, industry experts, TD, and the Inspectors.

55. Based on the Receiver's detailed review and consideration, the Receiver is of the belief that the value realized pursuant to the Settlement Agreement is properly characterized as a recovery for the benefit of the Receivership Entities, rather than a recovery of the Witzke Estate, for the following reasons:
- (a) Dr. Witzke operated Southside Dental through his professional corporations; the PC operated the clinic for approximately four years, and the New PC operated the clinic for approximately one year. During this time, either the PC or the New PC provided services to the clinic's patients, generating significant annual revenues in the range of approximately \$1.6 million to \$2.0 million reported in the financial records of the entities, employed numerous staff, and incurred the expenses associated with operating the dental clinic;
 - (b) based on consultations with industry experts, the Receiver understands that the primary component of any goodwill in a dental practice is the patient lists, with ancillary items such as a tradename, telephone number, or website typically having negligible or no standalone value. Furthermore, the Receiver understands that the expenses associated with these items were borne entirely by the professional corporations;
 - (c) the Equipment used in the operation of Southside Dental was owned by the PC and was conveyed pursuant to the Settlement Agreement;
 - (d) all leasehold improvements were included with the transferred assets (noting that the PC's unaudited financial statements listed leasehold improvements with an original cost of \$375,774 (2012) and a net book value of \$92,085 as of September 30, 2017 (amortized over the then lease term));
 - (e) based on the Equipment Lease, the New PC was to pay the PC monthly payments of \$3,083 for a period of five years from January 2017 to January 2022, for a total lease amount of \$185,000, with the Equipment to be returned at the expiry of the lease. However, no compensation was ever paid to the PC or the Receiver in respect of the Equipment Lease or for the use of the Equipment during the receivership; and

(f) both the PC and the New PC reported accounts receivable in their respective unaudited financial statements shortly before the Receiver's appointment over each entity. However, the Receiver did not collect any accounts receivable and does not know if some of these amounts were collected following the transfer of Southside Dental.

56. The Receiver notes that there is some uncertainty regarding the allocation of the value of the patient lists as between the PC and the New PC. However, in the circumstances, and following consultation with TD, TD has advised that it supports payment of CRA's deemed trust claim against the New PC in priority to its secured claim against that entity. Accordingly, a determination of value as between the PC and New PC is not required, as TD is the sole (secured) economic stakeholder and is expected to experience a significant shortfall on its security in any event.
57. Therefore, in these circumstances, and as a practical and reasonable allocation of the Settlement Proceeds, the Receiver respectfully proposes that a sufficient portion of the Settlement Proceeds be attributed to the New PC to satisfy CRA's deemed trust claim against the New PC in full, with the balance of the Settlement Proceeds attributed to the PC (the "**Proposed Allocation of Settlement Proceeds**").

STATEMENT OF RECEIPTS AND DISBURSEMENTS

58. The Receiver has prepared an SRD for the period up to February 13, 2026, which is segregated between the Receivership Estates and the Witzke Estate. As shown in the SRD, the Receiver is currently holding cash of \$795,207 in respect of the Receivership Entities and \$6,055 in respect of the Witzke Estate. The SRD is attached hereto as **Appendix "E"**.
59. Furthermore, the SRD also illustrates a proposed reallocation of certain costs funded through the Witzke Estate (with Inspector approval and funding from TD), the estimated disbursements to conclude the proceedings, and details of the Proposed Distribution (defined and discussed below).
60. The Trustee notes that it would be seeking approval of its final statement receipts and disbursements for the bankruptcy of the Witzke Estate separately and as typically required in bankruptcy proceedings; however, due to the interconnectedness of the estates, and re-allocation of costs, the Receiver has included the same in the SRD.

PROPOSED DISTRIBUTION

61. Subject to the Court's approval of the Proposed Allocation of Settlement Proceeds, the Receiver proposes the following distribution from the Receivership Estates (the "**Proposed Distribution**"):
- (a) \$3,457.37 to the CRA on account of its deemed trust for source deductions in respect of the PC;
 - (b) \$97,743 to CRA on account of its deemed trust claim for source deductions in respect of the New PC (notwithstanding some uncertainty on the value of the Settlement Proceeds attributable to the New PC, TD is supportive of paying this deemed trust in full in advance of its secured claim); and
 - (c) the remaining net proceeds, subject to the payment of the final professional fees, to TD as repayment of the funds advanced to the Receiver and in partial satisfaction of TD's secured indebtedness.
62. Based on the Proposed Distribution and the Receiver's estimate fees to complete the administrations (detailed below), TD is anticipated to experience a shortfall in excess of \$2.0 million on its secured indebtedness.

PROFESSIONAL FEES

63. The Receiver's professional fees from the commencement of the receivership proceedings to January 31, 2026, have amounted to approximately \$86,325 (plus GST) as reflected in the SRD.
64. The Receiver's legal counsel's professional fees and disbursements have amounted to a total of approximately \$30,575 (plus GST) to January 31, 2026, as reflected in the SRD.
65. Furthermore, given the interconnectedness of the estates and the Conveyance Action, the Receiver notes that certain of the professional fee invoices are co-mingled. Accordingly, the Receiver has conducted a detailed review of the professional fee invoices and estimates that total litigation costs related to the Conveyance Action which were funded through the Witzke Estate (with Inspector approval and from funding provided by TD) amount to approximately \$123,731 (plus GST) (the "**Litigation Costs**").

66. Attached as **Appendix “F”** is a summary of all professional fee invoices for the Receivership Entities and the Witzke Estate, with the estimated allocation of the Litigation Costs from the professional fee invoices incurred through the Witzke Estate.
67. Subject to the Court’s approval of the relief being sought herein, the Receiver and its counsel are estimating further additional professional fees or a proposed holdback of proceeds to conclude the receivership administration in the aggregate total of approximately \$70,000 (collectively, the “**Estimates to Complete**” or the “**Holdback**”).
68. The Receiver believes that the foregoing professional fees of the Receiver and its legal counsel, inclusive of the Litigation Costs and the Estimates to Complete (collectively, the “**Professional Fees**”), are fair and reasonable in the circumstances given, *inter alia*, the following material tasks which are summarized in the First Report and this Second Report;
- (a) facilitating a marketing process and conducting a sale of Medident’s assets;
 - (b) investigating and reviewing information in relation to the Receivership Entities and/or the transfer of Southside Dental;
 - (c) preparing Court materials and multiple Court applications, including but not limited to the First Report and Second Report;
 - (d) attending at the Southland Premises on multiple occasions to meet with Dr. Witzke, conducting an inventory of assets, entering into the Custodial Agreement, and arranging for insurance coverage for the Equipment;
 - (e) commencing the Conveyance Action, advancing same, and negotiating and entering into the Settlement Agreement;
 - (f) conducting a detailed assessment in relation to the Proposed Allocation of Settlement Proceeds;
 - (g) completing a final post receivership GST return and remitting any GST due, as well as closing this account with CRA;
 - (h) subject to the Court’s approval of the relief herein, distributing net proceeds to TD and completing additional final administrative tasks to conclude the receivership.
69. Accordingly, the Receiver respectfully recommends that the Court approve the Professional Fees.

DESTRUCTION OF RECORDS

70. The Receiver did not receive any material records of the Receivership Entities due to the lack of overall cooperation received. However, to the extent that the Receiver is holding any books and records of the Receivership Entities, it is proposing that it keep these records for a period of at least 30 days from the date a copy of the related Order is posted to the Receiver's website, for any entitled party to claim possession and take transfer at the cost of such party, after which the Receiver shall be entitled to destroy any of the books and records remaining in its possession or control.

DISCHARGE OF THE RECEIVER

71. Following a distribution of the net proceeds, in the event the Court approves the relief being sought, the Receiver will have substantially completed its administration in respect of the Receivership Entities, with primarily administrative tasks remaining.
72. As a result, the Receiver is seeking the Court's approval for its discharge as Receiver and termination of the proceedings upon the filing of a discharge certificate with the Court.
73. Similarly, the Trustee will be attending to the conclusion of the bankruptcy proceedings of the Witzke Estate and seeking its discharge in due course and as required in bankruptcy proceedings. The Trustee notes that Dr. Witzke's discharge hearing is currently scheduled for March 26, 2026, as his discharge was previously adjourned *sine die* by the Court pending the conclusion of the Conveyance Action.

RECOMMENDATION

74. The Receiver respectfully recommends that this Honourable Court approve:
- (a) the Receiver's activities as set out in the First Report and Second Report, inclusive of the SRD;
 - (b) the sale of the Equipment pursuant to the Settlement Agreement on a *nunc pro tunc* basis;
 - (c) the Proposed Allocation of Settlement Proceeds;
 - (d) the Proposed Distribution;
 - (e) the Professional Fees;
 - (f) the destruction of any records of the Receivership Entities, as applicable and as set

out herein; and

(g) the discharge of the Receiver and termination of the receivership proceedings.

All of which is respectfully submitted this 13th day of February, 2026.

BDO Canada Limited

In its capacity as Receiver of
Ronald C. Witzke Professional Dental Corporation
Medident Innovations Ltd., and
R.C. Witzke Professional Corporation
and not in its personal capacity.



Per: Breanne Scott, CPA, CIRP, LIT
Senior Vice President

APPENDIX “A”

**RONALD C. WITZKE
PROFESSIONAL DENTAL
CORPORATION**

FINANCIAL STATEMENTS
(Unaudited - See Notice to Reader)

SEPTEMBER 30, 2014



CHARTERED
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RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

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NOTICE TO READER

On the basis of information provided by management, we have compiled the Balance Sheet of Ronald C. Witzke Professional Dental Corporation as at September 30, 2014 and the Statements of Loss and Deficit and Cash Flows for the year then ended.

We have not performed an audit or a review engagement in respect of these financial statements and, accordingly, we express no assurance thereon.

Readers are cautioned that these statements may not be appropriate for their purposes.

Medicine Hat, Alberta
December 3, 2014

EBT
CHARTERED ACCOUNTANTS

RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

BALANCE SHEET (Unaudited - See Notice to Reader)

SEPTEMBER 30, 2014

ASSETS	2014	2013
CURRENT ASSETS		
Cash	\$ 69,536	\$ 161,602
Accounts receivable	96,782	128,557
Inventory	40,000	-
Deposits	8,201	8,201
Due from Dr. Baba	30,124	-
Income taxes receivable	2,788	-
Due from shareholder	82,431	-
	329,862	298,360
PROPERTY AND EQUIPMENT (Note 1)	350,799	452,823
	\$ 680,661	\$ 751,183
LIABILITIES		
CURRENT LIABILITIES		
Accounts payable and accrued liabilities	\$ 110,440	\$ 32,669
Bonus payable	-	24,184
Salaries payable	2,005	-
Income taxes payable	-	27,879
Due to related party	571,011	567,051
	683,456	651,783
DUE TO SHAREHOLDERS	-	98
	683,456	651,881
CAPITAL DEFICIENCY		
SHARE CAPITAL	100	100
RETAINED EARNINGS (DEFICIT)	(2,895)	99,202
	(2,795)	99,302
	\$ 680,661	\$ 751,183

RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

STATEMENT OF LOSS AND DEFICIT (Unaudited - See Notice to Reader)

FOR THE YEAR ENDED SEPTEMBER 30, 2014

	2014	2013
REVENUE	\$ 1,666,008	\$ 1,716,578
EXPENSES		
Advertising and promotion	24,243	44,426
Amortization	127,642	66,027
Bad debts	-	86,091
Contract service	157,976	127,063
Equipment lease	96	836
Insurance	3,585	1,038
Interest and bank charges	6,618	9,921
Interest on long-term debt	8,924	11,538
Meals and entertainment	17,812	14,013
Memberships, dues and licenses	14,105	12,291
Training	23,657	121,113
Office	31,135	38,525
Professional fees	51,798	32,155
Rent	43,683	38,601
Repairs and maintenance	24,848	10,026
Salaries and benefits - Dental Office	918,914	547,383
Supplies	225,830	346,142
Telephone	11,987	6,691
Travel	10,732	1,112
Utilities	10,419	5,828
Vehicle	11,954	4,777
	1,725,958	1,525,597
INCOME (LOSS) BEFORE INCOME TAXES	(59,950)	190,981
INCOME TAXES (RECOVERY OF)	(2,853)	27,879
NET INCOME (LOSS)	(57,097)	163,102
RETAINED EARNINGS, beginning of year	99,202	-
	42,105	163,102
DIVIDENDS	(45,000)	(63,900)
RETAINED EARNINGS (DEFICIT), end of year	\$ (2,895)	\$ 99,202

RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

STATEMENT OF CASH FLOWS (Unaudited - See Notice to Reader)

FOR THE YEAR ENDED SEPTEMBER 30, 2014

	2014	2013
OPERATING ACTIVITIES		
Net income (loss)	\$ (57,097)	\$ 163,102
Adjustments for		
Amortization	127,642	66,027
	70,545	229,129
Changes in non-cash working capital		
Accounts receivable	31,775	(128,557)
Inventory	(40,000)	-
Deposits	-	(8,201)
Due from Dr. Baba	(30,124)	-
Income taxes	(30,667)	27,879
Accounts payable and accrued liabilities	77,771	32,669
Bonus payable	(24,184)	24,184
Salaries payable	2,005	-
	57,121	177,103
INVESTING ACTIVITY		
Purchase of property and equipment	(25,618)	(518,850)
FINANCING ACTIVITIES		
Advances from (to) Dr. R.C. Witzke Professional Dental Corporation (Manitoba)	(34,332)	671,534
Advances from (to) 1690716 Alberta Ltd. (Sante)	38,292	(104,483)
Advances from (to) shareholder	(82,529)	98
Issuance of share capital	-	100
Dividends	(45,000)	(63,900)
	(123,569)	503,349
INCREASE (DECREASE) IN CASH	(92,066)	161,602
CASH, beginning of year	161,602	-
CASH, end of year	\$ 69,536	\$ 161,602

RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

NOTE TO THE FINANCIAL STATEMENTS (Unaudited - See Notice to Reader)

SEPTEMBER 30, 2014

1. PROPERTY AND EQUIPMENT

	Rate	Cost	Accumulated amortization	2014 Net	2013 Net
Equipment	20%	\$ 320,557	\$ 89,562	\$ 230,995	\$ 287,534
Office equipment	20%	21,092	2,110	18,982	-
Computer equipment	55%	11,305	6,240	5,065	5,694
Leasehold improvements	*	191,514	95,757	95,757	159,595
		\$ 544,468	\$ 193,669	\$ 350,799	\$ 452,823

* The leasehold improvements are amortized using the straight-line method over the term of the lease (three years).

**RONALD C. WITZKE
PROFESSIONAL DENTAL
CORPORATION**

FINANCIAL STATEMENTS
(Unaudited - See Notice to Reader)

SEPTEMBER 30, 2015



CHARTERED
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RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

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NOTICE TO READER

On the basis of information provided by management, we have compiled the Balance Sheet of Ronald C. Witzke Professional Dental Corporation as at September 30, 2015 and the Statements of Loss and Deficit and Cash Flows for the year then ended.

We have not performed an audit or a review engagement in respect of these financial statements and, accordingly, we express no assurance thereon.

Readers are cautioned that these statements may not be appropriate for their purposes.

Medicine Hat, Alberta
March 12, 2016

EBT

CHARTERED ACCOUNTANTS LLP

RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

BALANCE SHEET (Unaudited - See Notice to Reader)

SEPTEMBER 30, 2015

ASSETS	2015	2014
CURRENT ASSETS		
Cash	\$ -	\$ 69,536
Accounts receivable	130,549	96,782
Inventory	30,000	40,000
Deposits	16,401	8,201
Loans and notes receivable (Note 1)	-	30,124
Income taxes receivable	-	2,788
Due from shareholders	-	82,431
Due from related parties (Note 2)	694,737	495,610
	871,687	825,472
PROPERTY AND EQUIPMENT (Note 3)	600,173	350,799
	\$ 1,471,860	\$ 1,176,271
LIABILITIES		
CURRENT LIABILITIES		
Bank indebtedness	\$ 186,192	\$ -
Accounts payable and accrued liabilities	185,770	110,441
Salaries payable	838	2,005
Due to related parties (Note 2)	726,429	1,066,620
Current portion of long-term debt (Note 4)	80,000	-
	1,179,229	1,179,066
DUE TO SHAREHOLDERS	85	-
LONG-TERM DEBT (Note 4)	306,667	-
	1,485,981	1,179,066
CAPITAL DEFICIENCY		
SHARE CAPITAL	100	100
DEFICIT	(14,221)	(2,895)
	(14,121)	(2,795)
	\$ 1,471,860	\$ 1,176,271

RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

STATEMENT OF LOSS AND DEFICIT (Unaudited - See Notice to Reader)

FOR THE YEAR ENDED SEPTEMBER 30, 2015

	2015	2014
REVENUE		
Sales	\$ 1,862,850	\$ 1,666,008
Management Fees	145,300	-
	2,008,150	1,666,008
EXPENSES		
Advertising and promotion	49,333	24,243
Amortization	172,104	127,642
Bad debts	158,017	-
Contract service	247,338	157,976
Equipment lease	22,996	96
Insurance	6,631	3,585
Interest and bank charges	17,867	6,618
Interest on long-term debt	5,912	8,924
Meals and entertainment	13,040	17,812
Memberships, dues and licenses	2,920	14,105
Office	32,516	31,134
Professional fees	73,568	51,798
Rent	54,887	43,683
Repairs and maintenance	41,364	29,420
Salaries and benefits - Dental Office	761,482	918,914
Supplies	283,484	225,830
Telephone	13,025	11,987
Training	41,290	23,657
Travel	10,214	10,732
Utilities	8,669	10,419
Vehicle	2,819	7,383
	2,019,476	1,725,958
LOSS BEFORE INCOME TAXES	(11,326)	(59,950)
INCOME TAX RECOVERY	-	(2,853)
NET LOSS	(11,326)	(57,097)
RETAINED EARNINGS (DEFICIT), beginning of year	(2,895)	99,202
	(14,221)	42,105
DIVIDENDS	-	(45,000)
DEFICIT, end of year	\$ (14,221)	\$ (2,895)

RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

STATEMENT OF CASH FLOWS (Unaudited - See Notice to Reader)

FOR THE YEAR ENDED SEPTEMBER 30, 2015

	2015	2014
OPERATING ACTIVITIES		
Net loss	\$ (11,326)	\$ (57,097)
Adjustment for Amortization	172,104	127,642
<hr/>		
Changes in non-cash working capital	160,778	70,545
Accounts receivable	(33,767)	31,775
Inventory	10,000	(40,000)
Deposits	(8,200)	-
Loans and notes receivable	30,124	(30,124)
Income taxes	2,788	(30,667)
Accounts payable and accrued liabilities	75,329	77,772
Bonus payable	-	(24,184)
Salaries payable	(1,167)	2,005
<hr/>		
	235,885	57,122
<hr/>		
INVESTING ACTIVITY		
Purchase of property and equipment	(421,478)	(25,618)
<hr/>		
FINANCING ACTIVITIES		
Bank indebtedness	186,192	-
Advances from (to) Dr. R.C. Witzke Professional Dental Corporation (Manitoba)	(539,318)	108,442
Advances from (to) 1690716 Alberta Ltd. (Sante)	-	(104,483)
Advances from (to) shareholder	82,516	(82,529)
Repayment of long-term debt	386,667	-
Dividends	-	(45,000)
<hr/>		
	116,057	(123,570)
<hr/>		
DECREASE IN CASH	(69,536)	(92,066)
CASH, beginning of year	69,536	161,602
<hr/>		
CASH, end of year	\$ -	\$ 69,536

RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

NOTES TO THE FINANCIAL STATEMENTS (Unaudited - See Notice to Reader)

SEPTEMBER 30, 2015

1. LOANS AND NOTES RECEIVABLE

	2015	2014
Due from Dr. Chris Baba	\$ -	\$ 30,124

2. DUE FROM/TO RELATED PARTIES

(a) Due from related parties

Due from 1690716 Alberta Ltd.	\$ -	\$ 128,417
Due from Medident Innovations Ltd.	561,734	241,050
Due from Medident Health Centre Ltd.	133,003	126,143
	\$ 694,737	\$ 495,610

(b) Due to related parties

Due from Southside Dental	\$ -	\$ 1,065
Due to Dr. R.C. Witzke Professional Dental Corporation	726,429	1,065,555
	\$ 726,429	\$ 1,066,620

3. PROPERTY AND EQUIPMENT

	Rate	Cost	Accumulated amortization	2015 Net	2014 Net
Equipment	20%	\$ 548,414	\$ 158,547	\$ 389,867	\$ 230,995
Office equipment	20%	24,493	6,246	18,247	18,982
Computer equipment	55%	17,357	10,691	6,666	5,065
Leasehold improvements	*	375,683	190,290	185,393	95,757
		\$ 965,947	\$ 365,774	\$ 600,173	\$ 350,799

* The leasehold improvements are amortized using the straight-line method over the term of the lease (three years).

RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

NOTES TO THE FINANCIAL STATEMENTS (Unaudited - See Notice to Reader)

SEPTEMBER 30, 2015

4. LONG-TERM DEBT

	2015	2014
Toronto Dominion loan, repayable in monthly instalments of \$6,667 plus interest at prime, secured by general security agreements and guarantees, due July 2020	\$ 386,667	\$ -
Less current portion	80,000	-
	<u>\$ 306,667</u>	<u>\$ -</u>
Estimated principal repayments are as follows:		
2016	\$ 80,000	
2017	80,000	
2018	80,000	
2019	80,000	
2020	66,667	
	<u>\$ 386,667</u>	

**RONALD C. WITZKE
PROFESSIONAL DENTAL
CORPORATION**

FINANCIAL STATEMENTS
(Unaudited - See Notice to Reader)

SEPTEMBER 30, 2016



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RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

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NOTICE TO READER

On the basis of information provided by management, we have compiled the Balance Sheet of Ronald C. Witzke Professional Dental Corporation as at September 30, 2016 and the Statements of Income and Retained Earnings and Cash Flows for the year then ended.

We have not performed an audit or a review engagement in respect of these financial statements and, accordingly, we express no assurance thereon.

Readers are cautioned that these statements may not be appropriate for their purposes.

Medicine Hat, Alberta
November 23, 2016

EBT

CHARTERED ACCOUNTANTS LLP

RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

BALANCE SHEET (Unaudited - See Notice to Reader)

SEPTEMBER 30, 2016

ASSETS	2016	2015
CURRENT ASSETS		
Accounts receivable	\$ 161,684	\$ 130,549
Inventory	30,000	30,000
Deposits	16,401	16,401
Due from related parties (Note 1)	945,872	694,737
	1,153,957	871,687
PROPERTY AND EQUIPMENT (Note 2)	421,576	600,173
	\$ 1,575,533	\$ 1,471,860
LIABILITIES		
CURRENT LIABILITIES		
Bank indebtedness	\$ 177,948	\$ 186,192
Accounts payable and accrued liabilities	165,447	185,770
Salaries payable	-	838
Income taxes payable	25,271	-
Due to related party (Note 1)	823,046	726,429
Current portion of long-term debt (Note 3)	80,000	80,000
	1,271,712	1,179,229
DUE TO SHAREHOLDERS	19	85
LONG-TERM DEBT (Note 3)	226,667	306,667
	1,498,398	1,485,981
SHAREHOLDERS' EQUITY		
SHARE CAPITAL	100	100
RETAINED EARNINGS (DEFICIT)	77,035	(14,221)
	77,135	(14,121)
	\$ 1,575,533	\$ 1,471,860
	\$ 1,575,533	\$ 1,471,860

RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

STATEMENT OF INCOME AND RETAINED EARNINGS (Unaudited - See Notice to Reader)

FOR THE YEAR ENDED SEPTEMBER 30, 2016

	2016	2015
REVENUE		
Sales	\$ 2,033,987	\$ 1,862,850
Management Fees	-	145,300
	2,033,987	2,008,150
EXPENSES		
Advertising and promotion	43,567	49,333
Amortization	178,598	172,104
Bad debts	16,828	158,017
Contract service	232,512	247,338
Equipment lease	3,852	22,996
Freight	173	-
Insurance	8,685	6,631
Interest and bank charges	29,236	17,867
Interest on long-term debt	9,789	5,912
Meals and entertainment	7,014	13,040
Memberships, dues and licenses	3,464	2,920
Office	24,123	32,516
Professional fees	130,741	73,568
Rent	91,972	54,887
Repairs and maintenance	38,936	41,364
Salaries and benefits	758,221	761,482
Supplies	216,744	283,484
Telephone	14,472	13,025
Training	5,598	41,290
Travel	9,022	10,214
Utilities	13,365	8,669
Vehicle	2,848	2,819
	1,839,760	2,019,476
INCOME (LOSS) BEFORE INCOME TAXES	194,227	(11,326)
INCOME TAXES	25,271	-
NET INCOME (LOSS)	168,956	(11,326)
DEFICIT, beginning of year	(14,221)	(2,895)
	154,735	(14,221)
DIVIDENDS	(77,700)	-
RETAINED EARNINGS (DEFICIT), end of year	\$ 77,035	\$ (14,221)

RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

STATEMENT OF CASH FLOWS (Unaudited - See Notice to Reader)

FOR THE YEAR ENDED SEPTEMBER 30, 2016

	2016	2015
OPERATING ACTIVITIES		
Net income (loss)	\$ 168,956	\$ (11,326)
Adjustment for Amortization	178,598	172,104
	347,554	160,778
Changes in non-cash working capital		
Accounts receivable	(31,135)	(33,767)
Inventory	-	10,000
Deposits	-	(8,200)
Loans and notes receivable	-	30,124
Accounts payable and accrued liabilities	(20,324)	75,329
Salaries payable	(838)	(1,167)
Income taxes	25,271	2,788
	320,528	235,885
INVESTING ACTIVITY		
Purchase of property and equipment	-	(421,478)
FINANCING ACTIVITIES		
Advances to Dr. R.C. Witzke Professional Dental Corporation (Manitoba)	(154,518)	(434,835)
Advances to 1690716 Alberta Ltd. (Sante)	-	(104,483)
Advances from (to) shareholders	(66)	82,516
Repayment of long-term debt	(80,000)	386,667
Dividends	(77,700)	-
	(312,284)	(70,135)
DECREASE (INCREASE) IN BANK INDEBTEDNESS	8,244	(255,728)
CASH (BANK INDEBTEDNESS), beginning of year	(186,192)	69,536
BANK INDEBTEDNESS, end of year	\$ (177,948)	\$ (186,192)

RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

NOTES TO THE FINANCIAL STATEMENTS (Unaudited - See Notice to Reader)

SEPTEMBER 30, 2016

1. DUE FROM/TO RELATED PARTIES

(a) Due from related parties

Due from Medident Innovations Ltd.	\$ 783,466	\$ 561,734
Due from Medident Health Centre Ltd.	162,406	133,003
	\$ 945,872	\$ 694,737

(b) Due to related party

Due to Dr. R.C. Witzke Professional Dental Corporation	\$ 823,046	\$ 726,429
	\$ 823,046	\$ 726,429

2. PROPERTY AND EQUIPMENT

	Rate	Cost	Accumulated amortization	2016 Net	2015 Net
Equipment	20%	\$ 548,414	\$ 236,520	\$ 311,894	\$ 389,867
Office equipment	20%	24,493	9,896	14,597	18,247
Computer equipment	55%	17,357	14,357	3,000	6,666
Leasehold improvements	*	375,683	283,598	92,085	185,393
		\$ 965,947	\$ 544,371	\$ 421,576	\$ 600,173

* The leasehold improvements are amortized using the straight-line method over the term of the lease (three years).

RONALD C. WITZKE PROFESSIONAL DENTAL CORPORATION

NOTES TO THE FINANCIAL STATEMENTS (Unaudited - See Notice to Reader)

SEPTEMBER 30, 2016

3. LONG-TERM DEBT

	2016	2015
Toronto Dominion loan, repayable in monthly instalments of \$6,667 plus interest at prime, secured by general security agreements and guarantees, due July 2020	\$ 306,667	\$ 386,667
Less current portion	80,000	80,000
	<u>\$ 226,667</u>	<u>\$ 306,667</u>
Estimated principal repayments are as follows:		
2017	\$ 80,000	
2018	80,000	
2019	80,000	
2020	66,667	
	<u>\$ 306,667</u>	

APPENDIX “B”

**R.C. WITZKE PROFESSIONAL
CORPORATION**

FINANCIAL STATEMENTS
(Unaudited - See Notice to Reader)

DECEMBER 31, 2017

R.C. WITZKE PROFESSIONAL CORPORATION

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NOTICE TO READER

On the basis of information provided by management, we have compiled the Balance Sheet of R.C. Witzke Professional Corporation as at December 31, 2017 and the Statements of Income and Retained Earnings and Cash Flows for the eleven month period then ended.

We have not performed an audit or a review engagement in respect of these financial statements and, accordingly, we express no assurance thereon.

Readers are cautioned that these statements may not be appropriate for their purposes.

We did not prepare nor accrue for federal or provincial taxes.

Medicine Hat, Alberta
August 20, 2018

CHARTERED ACCOUNTANTS LLP

R.C. WITZKE PROFESSIONAL CORPORATION

BALANCE SHEET (Unaudited - See Notice to Reader)

DECEMBER 31, 2017

ASSETS

CURRENT ASSETS

Cash	\$ 32,941
Accounts receivable	127,877
Due from shareholder	112,055

272,873

DUE FROM RELATED PARTIES (Note 1)

87,540

\$ 360,413

LIABILITIES

CURRENT LIABILITIES

Accounts payable and accrued liabilities	\$ 97,278
Source remittances payable	72,006

169,284

SHAREHOLDER'S EQUITY

SHARE CAPITAL 100

RETAINED EARNINGS 191,029

191,129

\$ 360,413

R.C. WITZKE PROFESSIONAL CORPORATION

STATEMENT OF INCOME AND RETAINED EARNINGS

(Unaudited - See Notice to Reader)

FOR THE ELEVEN MONTH PERIOD ENDED DECEMBER 31, 2017

SALES	\$ 1,582,021
COST OF SALES	397,565
GROSS PROFIT	1,184,456
EXPENSES	
Accounting and legal	59,959
Advertising and promotion	26,358
Computer expense	581
Credit card discounts	149
Donations	355
Insurance	8,046
Interest and bank charges	14,956
Laundry and cleaning	34,633
Meals and entertainment	235
Memberships, dues and licenses	1,271
Office	13,482
Postage and courier	1,295
Rent	75,874
Repairs and maintenance	3,774
Telephone	10,496
Training	1,859
Travel	3,100
Utilities	10,274
Wages and benefits	726,630
	993,327
NET INCOME	191,129
RETAINED EARNINGS, beginning of period	-
	191,129
DIVIDENDS	(100)
RETAINED EARNINGS, end of period	\$ 191,029

R.C. WITZKE PROFESSIONAL CORPORATION

STATEMENT OF CASH FLOWS (Unaudited - See Notice to Reader)

FOR THE ELEVEN MONTH PERIOD ENDED DECEMBER 31, 2017

OPERATING ACTIVITIES

Net income	\$ 191,129
Changes in non-cash working capital	
Accounts receivable	(127,877)
Accounts payable and accrued liabilities	97,278
Source remittances payable	72,006
	<hr/>
	232,536

FINANCING ACTIVITIES

Advances to related party	(87,540)
Advances to shareholder	(112,055)
Issuance (redemption) of share capital	100
Dividends	(100)
	<hr/>
	(199,595)

INCREASE IN CASH

32,941

CASH, beginning of period

-

CASH, end of period

\$ 32,941

R.C. WITZKE PROFESSIONAL CORPORATION

NOTE TO THE FINANCIAL STATEMENTS

(Unaudited - See Notice to Reader)

DECEMBER 31, 2017

1. DUE FROM RELATED PARTIES

1690716 Alberta Ltd.	\$	592
Medident Innovations Ltd.		61,363
Medident Health Centre Ltd.		14,299
Dr. R.C. Witzke Professional Dental Corporation		256
Ronald C. Witzke Professional Dental Corporation		11,030
		<hr/>
	\$	87,540
		<hr/>

APPENDIX “C”

BDO Canada Limited / BDO Canada Limitée

Claims Register

In the matter of the bankruptcy of
 Ronald Christopher Witzke
 of the City of Medicine Hat, in the Province of Alberta

Insolvency Date: 11-Jul-2018

Estate Number: 25-2398661

<i>Creditor Name</i>	<i>Proof of Claim?</i>	<i>Claim Status</i>	<i>Rank / Class</i>	<i>SOA Amount</i>	<i>Amount Filed</i>	<i>Admitted for Dividend</i>
Secured creditors						
1. RBC Royal Bank c/o BankruptcyHighway.com Attn: Razel Bowen 2013 Jeep Wrangler	Yes	Secured asset released		23,000.00	22,278.87	
Total : Secured creditors				<u>23,000.00</u>	<u>22,278.87</u>	
Unsecured creditors						
1. Alberta Justice - Maintenance Enforcement Program 1984-897	Yes	Admitted		75,000.00	70,245.49	70,245.49
2. CBV Collection Services Ltd.	No	Not proved				
3. CRA - Tax - Prairies 31-121	Yes	Admitted		134,000.00	134,169.47	134,169.47
4. CRA - Tax - Prairies RC	No	Not proved		1.00		
5. CRA - Tax - Prairies RP	No	Not proved		70,227.00		
6. Department of National Defence, Office of the DND/CF LA, CCL Attn: DND/CF Office of the Legal Advisor Canadian Forces	Yes	Admitted		40,000.00	52,144.22	52,144.22
7. Manitoba Hydro Attn: Credit & Recovery Services/Bankruptcy & Insolvency Dept. 8181700 6205772	Yes	Admitted			495.74	495.74
8. Stringam LLP Attn: Luke Day Counsel for the bankrupt	Yes	Admitted				
9. TD Canada Trust 1000142876	Yes	Admitted		2,500,000.00	2,520,267.31	2,520,267.31
10. TD Canada Trust C/O FCT Default Solutions Attn: CC&R Insolvency and Credit Counselling 5241281 8928	Yes	Admitted			4,407.38	4,407.38
11. TD Canada Trust Visa C/O FCT Default Solutions Attn: CC&R Insolvency and Credit Counselling 4520710031189274	Yes	Admitted		300.00	598.63	598.63
12. TD Canada Trust Visa C/O FCT Default Solutions Attn: CC&R Insolvency and Credit Counselling 4520850017969172	Yes	Admitted		15,000.00	14,470.83	14,470.83
Total : Unsecured creditors				<u>2,834,528.00</u>	<u>2,796,799.07</u>	<u>2,796,799.07</u>
Grand Total:				2,857,528.00	2,819,077.94	2,796,799.07

APPENDIX “D”

Clerk's Stamp:

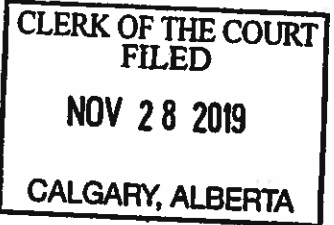
COURT FILE NUMBER

1901-16831

COURT OF QUEEN'S BENCH OF
ALBERTA

JUDICIAL CENTRE

CALGARY



PLAINTIFF(S)

**HARDIE & KELLY INC., in its capacities
as Receiver of Ronald C. Witzke
Professional Dental Corporation and R.C.
Witzke Professional Corporation, and in
its capacity as Bankruptcy Trustee of
Ronald Christopher Witzke and not in its
personal capacity**

DEFENDANT(S)

**RONALD CHRISTOPHER WITZKE,
RONALD C. WITZKE PROFESSIONAL
DENTAL CORPORATION, RONALD C.
WITZKE PROFESSIONAL DENTAL
CORPORATION DOING BUSINESS AS
"SOUTHSIDE DENTAL", R.C. WITZKE
PROFESSIONAL CORPORATION, R.C.
WITZKE PROFESSIONAL CORPORATION
DOING BUSINESS AS "SOUTHSIDE
DENTAL", BRIAN MURRAY, BRIAN
MURRAY PROFESSIONAL
CORPORATION, BRIAN MURRAY
PROFESSIONAL CORPORATION AND
BRIAN MURRAY DOING BUSINESS AS
ABLE DENTAL GROUP AND
"SOUTHSIDE DENTAL", 1843764
ALBERTA LTD., KIM MCNOLTY and JOHN
DOE**

DOCUMENT

STATEMENT OF CLAIM

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS DOCUMENT

G. James Thorlakson
Dentons Canada LLP
2500 Stantec Tower
10220 - 103 Avenue NW
Edmonton, Alberta T5J 0K4
Ph. (780) 423-723-7234 Fax (780) 423-7276
File No.: 570503.3

NOTICE TO DEFENDANT(S)

You are being sued. You are a defendant.

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

Note: State below only facts and not evidence (Rule 13.6)

Statement of facts relied on:

1. The Defendant, Ronald Christopher Witzke ("**Dr. Witzke**") is a dentist residing in Medicine Hat, Alberta.
2. Hardie & Kelly Inc. is the current Trustee of Dr. Witzke's estate (the "**Trustee**") in Estate No. 25-2398661 (the "**Bankruptcy Action**") following an assignment by Dr. Witzke under section 49 of the *Bankruptcy and Insolvency Act* ("**BIA**").
3. Dr. Witzke operated a dental practice personally and through or in conjunction with companies owned and controlled by Dr. Witzke operating under the name "Southside Dental" at 2020 Strachan Rd. SE in Medicine Hat, Alberta (the "**Southside Premises**"), including Ronald C. Witzke Professional Dental Corporation (the "**PC**").
4. In February 2017, Dr. Witzke set up a new professional corporation, R.C. Witzke Professional Corporation (the "**New Prof Corp**").
5. Through the New Prof Corp, Dr. Witzke continued to operate Southside Dental at the Southside Premises using the assets of the PC and serving the same dental patients and using the same patient files. Pursuant to an agreement purporting to be a five-year Equipment Lease dated February 7, 2017 (the "**Equipment Lease**"), the New Prof Corp was obliged to pay the PC monthly payments of \$3,083.33. No lease payments under the Equipment Lease have ever been made by the New Prof Corp to the PC.

6. Leasehold improvements listed on the PC's balance sheet and certain other unrecorded intangible assets, such as the "Southside Dental" trade name, the Southside Premises, business telephone and patient information for Dr. Witzke's patients were transferred by Dr. Witzke from the PC to the New Prof Corp for its use, while no consideration or inadequate consideration was ever paid by the New Prof Corp.
7. On June 8, 2017, in the course of receivership proceedings in the Court of Queen's Bench of Alberta, Judicial District of Calgary, Action 1701-07486, Hardie & Kelly Inc., was appointed as Receiver of the PC (the "PC Receiver").
8. On June 8, 2017, the PC Receiver attended at the Southside Premises to review the status of the various assets. The PC Receiver entered into a custodial agreement (the "Custodial Agreement") with Dr. Witzke and the New Prof Corp wherein they agreed to act as joint custodians of the assets while the PC Receiver and the New Prof Corp negotiated a new lease agreement with respect to the PC's assets.
9. On June 27, 2018, Hardie & Kelly Inc. was appointed as Receiver of the New Prof Corp (the "New PC Receiver", and the PC Receiver and the New PC Receiver are collectively the "Receiver").
10. On or about April 1, 2018, Brian Murray Professional Corporation, a company controlled by the Defendant Brian Murray, began carrying on a dental practice at the Southside Premises. These Defendants operate their business under the trade name Able Dentistry Group. Brian Murray and Brian Murray Professional Corporation are collectively referred to as "Able Dentistry").
11. Dr. Witzke retained his patient records and uploaded or input patient information and records to Able Dentistry's electronic patient database.
12. Able Dentistry has engaged the services of Dr. Witzke through an agreement with the Defendant, 1843764 Alberta Ltd. ("184 Alberta").
13. 184 Alberta is a corporation owned and controlled by Kim McNolty ("McNolty"), of Medicine Hat, Alberta. Dr. Witzke, McNolty and 184 Alberta have structured Dr. Witzke's affairs and have conspired to provide services to Dr. Witzke's former patients in conjunction with Able Dentistry with a view towards defeating or delaying the creditors of Dr. Witzke and his companies.
14. Able Dentistry, in conjunction with Dr. Witzke, have made use of the dental equipment of the PC and taken over Dr. Witzke's patients and the goodwill

associated with those patients, and use the same telephone number and website ("Dr. Witzke's Dental Practice") and carry on business at the Southside Premises as "Southside Dental" and have paid no consideration or inadequate consideration for same.

15. Most of Able Dentistry's patients at the Southside Premises were formerly Dr. Witzke's patients at the Southside Premises. Dr. Witzke continues to practice at Southside Dental and serve his previous patients.
16. The Plaintiff states that the transfer of Dr. Witzke's Dental Practice, use of the "Southside Dental" trade name, phone number, website, and the goodwill associated with that practice and the dental equipment at the Southside Premises by Able Dentistry for no consideration or for inadequate consideration constituted fraudulent conveyances within the meaning of the *Fraudulent Preferences Act*, R.S.A. 2000, c. F-24 and the *Statute of Elizabeth*, 1530 (13 Elizabeth 1, c. 5) and are void.
17. The Defendants have been unjustly enriched by their actions.
18. By their actions, the Defendants have aided and abetted in a breach of the Custodial Agreement.
19. The Defendants are parties to a civil conspiracy by unlawful means.
20. The actions of the Defendants constitute oppressive or unfair conduct towards the creditors of Dr. Witzke and the PC. The Receiver and the Trustee have standing as a Complainant pursuant to the *Business Corporations Act*, R.S.A. 2000, c. B-9, and are entitled to relief on the ground of oppression or unfairness pursuant to s. 242 of the *Business Corporations Act*, and such other relief as the Court thinks fit pursuant to Part 19 of the *Business Corporations Act*.
21. The Defendants have engaged the assistance of and entered into agreements with other persons unknown to the Receiver including the Defendant John Doe in furtherance of their conspiracy to transfer Dr. Witzke's Dental Practice and equipment, and to structure their affairs to defeat creditors. These unknown persons have aided and abetted this conspiracy. The identities of these persons are unknown to the Receiver and the Trustee at this time, and such persons will be added as Defendants to this action following a review of the Defendants' banking, financial and accounting records, and Questioning of the Defendants and other persons pursuant to the Rules of Court.

22. The Defendants' wrongful actions constitute wanton disregard towards the Receiver, the Trustee and to the creditors of Dr. Witzke and the PC so as to justify an award of punitive, aggravated or exemplary damages.

Remedy sought:

23. A declaration that the transfer and use of dental equipment and Dr. Witzke's Dental Practice and the goodwill associated with that practice, and use of the "Southside Dental" trade name at the Southside Premises for no consideration or inadequate consideration were fraudulent conveyances and are void.
24. Judgment against the Defendants in the amount of \$1,500,000, including without limitation the value of the Dental Practice, dental equipment use, use of the trade name "Southside Dental" at the Southside Premises and associated good will, or in such amount as this Honourable Court may allow.
25. Alternatively, an Order directing an assessment of the value of the Dental Practice, dental equipment use, use of the trade name "Southside Dental" at the Southside Premises and associated good will, and Judgment in that amount.
26. A declaration that all improperly transferred assets, goodwill and the Dental Practice are held by the Defendants as constructive trustee.
27. An accounting and disgorgement of profits.
28. A declaration that the actions of the Defendants constituted oppressive or unfair conduct towards the creditors of Dr. Witzke and the PC pursuant to Part 19 of the *Business Corporations Act*, together with such relief as the Court thinks fit pursuant to s. 242 of the *Business Corporations Act*;
29. An Attachment Order or Mareva Injunction.
30. A tracing order.
31. Punitive damages of \$150,000.
32. An Order lifting the stay of proceedings in the Bankruptcy Action in favour of the Trustee, pursuant to section 69.4 of the BIA.
33. Judgment interest.
34. Costs on an indemnity basis.
35. Such other relief as this Honourable Court may allow.

NOTICE TO THE DEFENDANT(S)

You only have a short time to do something to defend yourself against this claim:

20 days if you are served in Alberta

1 month if you are served outside Alberta but in Canada

2 months if you are served outside Canada

You can respond by filing a statement of defence or a demand for notice in the office of the clerk of the Court of Queen's Bench at Edmonton, Alberta, AND serving your statement of defence or a demand for notice on the plaintiff(s)' address for service.

WARNING

If you do not file and serve a statement of defence or a demand for notice within your time period, you risk losing the law suit automatically. If you do not file, or do not serve, or are late in doing either of these things, a court may give a judgment to the plaintiff(s) against you.

APPENDIX “E”

In the matter of the Receivership of the PC, the New PC, and Medident, and the Bankruptcy of the Witzke Estate

	Receivership			
	Entities	Witzke Estate		Total
<u>Receipts</u>				
Asset realizations / recoveries	\$ 957,357	\$ 38,064	\$	995,422
Funds advanced by TD	60,340	171,147		231,487
	\$ 1,017,697	\$ 209,211	\$	1,226,909
<u>Disbursements</u>				
Legal fees and disbursements	30,575	113,367		143,943
Receiver / Trustee fees	86,325	56,448		142,772
Occupation rent	44,801	-		44,801
Insurance	23,330	17,698		41,028
Utilities	17,075	-		17,075
GST paid	9,840	8,799		18,638
Other misc.	10,544	6,845		17,389
	222,490	203,156		425,646
Net cash in trust	\$ 795,207	\$ 6,055	\$	801,263
<u>Reallocation of costs</u>				
Litigation costs	-	129,892	129,892	-
Insurance / appraisal	-	24,523	24,523	-
	-	154,415	154,415	-
<u>Estimated Disbursements</u>				
Receiver / Trustee fees	-	35,000	-	30,000
Legal fees and disbursements	-	35,000	-	-
GST to be remitted	-	4,900	-	-
	-	74,900	-	30,000
Estimated net cash available	\$ 565,893	\$ 130,470	\$	696,363
Less: CRA deemed trust (PC & New PC)	-	101,200	-	-
Less: Repayment of borrowed funds to TD	-	36,826	-	130,470
	-	138,026	-	130,470
Estimated distribution proceeds (to TD)	\$ 427,866	\$ -	\$	427,866

APPENDIX “F”

Witze et al
Summary of Professional Fees
As of February 13, 2026

Witzke Estate

Invoice	Date	Fees	GST	Total	Fees Allocated between (excl GST):		
					Administration	Litigation	
Trustee Fees							
HKI 01022020	1/3/2020	10,562.00	528.10	11,090.10	9,386.00	1,176.00	
HKI 6092021	2/28/2020	648.00	32.40	680.40	564.00	84.00	
BDO CINV1545881	1/22/2022	22,965.00	1,148.25	24,113.25	9,945.00	13,020.00	
BDO CINV257510	10/23/2023	22,272.50	1,113.63	23,386.13	3,995.50	18,277.00	
		<u>56,447.50</u>	<u>2,822.38</u>	<u>59,269.88</u>	<u>23,890.50</u>	<u>32,557.00</u>	

Legal Fees

Dentons 3389952	11/29/2018	3,578.20	178.92	3,757.12	3,578.20	
3404940	1/31/2019	1,805.20	90.27	1,895.47	1,805.20	
3416632	3/29/2019	9,182.09	459.10	9,641.19	9,182.09	
3428662	5/30/2019	3,423.60	171.19	3,594.79	3,423.60	
3443007	7/31/2019	1,442.00	72.10	1,514.10	1,442.00	
3453143	9/25/2019	5,525.19	275.76	5,800.95	2,762.60	2,762.60
3465585	11/21/2019	4,209.30	210.47	4,419.77		4,209.30
3473558	12/20/2019	2,848.95	129.95	2,978.90		2,848.95
3480701	01/23/2020	5,703.37	285.17	5,988.54		5,703.37
3476425	01/31/2020	1,521.65	76.09	1,597.74		1,521.65
3494848	03/23/2020	9,734.89	484.25	10,219.14		9,734.89
3505322	04/30/2020	7,235.50	361.78	7,597.28		7,235.50
3509068	05/28/2020	3,315.55	165.78	3,481.33		3,315.55
3530882	08/31/2020	2,092.50	104.63	2,197.13		2,092.50
3537588	09/30/2020	1,826.13	91.31	1,917.44		1,826.13
3540504	10/29/2020	1,333.30	64.17	1,397.47		1,333.30
3553418	12/29/2020	2,722.66	136.14	2,858.80		2,722.66
3558709	01/15/2021	3,822.55	191.13	4,013.68		3,822.55
3571272	02/28/2021	4,103.00	202.65	4,305.65		4,103.00
3593177	06/14/2021	1,083.50	54.18	1,137.68		1,083.50
3608080	08/18/2021	3,107.50	155.38	3,262.88		3,107.50
3620756	10/14/2021	1,120.50	56.03	1,176.53		1,120.50
3636724	12/20/2021	1,160.50	58.03	1,218.53		1,160.50
3642696	01/14/2022	5,795.25	289.62	6,084.87		5,795.25
3657963	03/18/2022	1,418.83	70.95	1,489.78		1,418.83
3685309	07/12/2022	3,450.98	170.05	3,621.03		3,450.98
3715979	11/18/2022	4,471.66	223.58	4,695.24		4,471.66
3722769	12/14/2022	1,403.38	70.17	1,473.55		1,403.38
3731592	01/17/2023	2,533.80	126.69	2,660.49		2,533.80
3753729	04/13/2023	2,304.52	112.73	2,417.25		2,304.52
3769616	06/21/2023	3,833.66	191.68	4,025.34		3,833.66
3775436	07/13/2023	6,257.77	312.89	6,570.66		6,257.77
		<u>113,367.48</u>	<u>5,642.84</u>	<u>119,010.32</u>	<u>22,193.69</u>	<u>91,173.80</u>

Total Litigation Costs (funded through bankruptcy) **123,730.80**
GST **6,161.24**
129,892.04

Witze et al
Summary of Professional Fees
As of February 13, 2026

Ronald C. Witzke Professional Dental Corp (the PC)

	Invoice	Date	Fees	GST	Total
Receiver Fees:					
HKI	12132017	12/13/2017	7,475.00	373.75	7,848.75
HKI	1092019	1/8/2019	9,499.00	474.45	9,973.45
BDO	CINV3784164	2/12/2026	12,320.00	616.00	12,936.00
BDO	CINV3784175	2/12/2026	10,625.00	531.25	11,156.25
			<u>39,919.00</u>	<u>1,995.45</u>	<u>41,914.45</u>

Legal Fees

Denton

3558709	Revised		293.88	14.70	308.58
3803708	19/11/2023		1,322.52	66.13	1,388.65
3818430	15/01/2024		1,917.86	95.89	2,013.75
3843182	19/04/2024		1,349.30	67.47	1,416.77
3865303	15/07/2024		1,111.89	55.60	1,167.49
3871201	12/08/2024		3,147.17	157.36	3,304.53
3879354	12/09/2024		9,746.02	487.30	10,233.32
3885736	09/10/2024		4,375.44	218.77	4,594.21
3909823	13/01/2025		2,927.26	146.36	3,073.62
3926570	14/03/2025		1,299.80	64.99	1,364.79
260066641	31/01/2026		3,084.34	154.22	3,238.56
			<u>30,575.48</u>	<u>1,528.79</u>	<u>32,104.27</u>

R.C. Witzke Professional Corp (New PC)

	Invoice	Date	Fees	GST	Total
Receiver Fees:					
HKI	1102019	1/8/2019	12,880.00	644.00	13,524.00
BDO	CINV3784176	02/12/2026	8,080.00	404.00	8,484.00
			<u>20,960.00</u>	<u>1,048.00</u>	<u>22,008.00</u>

Medident Innovations Ltd.

	Invoice	Date	Fees	GST	Total
Receiver Fees:					
HKI	12/13/2017	12/13/2017	14,189.00	709.45	14,898.45
HKI	1082019	1/8/2019	9,409.00	470.45	9,879.45
BDO	CINV3784177	2/12/2026	1,847.50	92.38	1,939.88
			<u>25,445.50</u>	<u>1,272.28</u>	<u>26,717.78</u>

Total Fees (ALL ESTATES) 286,714.96 14,309.74 301,024.70

TOTAL RECEIVERSHIP PROFESSIONAL FEES

Receiver Fees	86,324.50	4,315.73	90,640.23
Legal	30,575.48	1,528.79	32,104.27
Litigation Costs (through bankruptcy)	123,730.80	6,161.24	129,892.04
	<u>240,630.78</u>	<u>12,005.76</u>	<u>252,636.54</u>