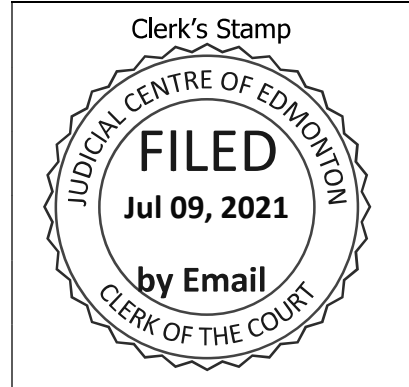


COURT FILE NO. 2103 10970  
COURT COURT OF QUEEN'S BENCH OF ALBERTA  
JUDICIAL CENTRE EDMONTON



PLAINTIFF CANADIAN WESTERN BANK  
DEFENDANT SHAMROCK VALLEY ENTERPRISES LTD.  
DOCUMENT **APPLICATION FOR RECEIVER AND MANAGER**

COM - \$50 (Invoice #110025)

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT  
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**NOTICE TO RESPONDENTS:**

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

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

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

**Date:** July 30, 2021  
**Time:** 10:00 a.m.  
**Where:** Law Courts, 1A Sir Winston Churchill Square, Edmonton, AB T5J 0R2  
**Before Whom:** Mr. Justice James T. Neilson

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

**Remedy claimed or sought:**

1. An Order abridging the time for service of notice of this Application to that actually given.
2. An order appointing The Bowra Group Inc. as receiver and manager of Shamrock Valley Enterprises Ltd. (the "Debtor"), substantially in the form attached hereto and marked as Schedule "A".

3. Such further and other relief as counsel may advise and as this Honourable Court may deem fit.

**Grounds for making this application:**

4. The Plaintiff is first secured creditor over the Debtor's present and after acquired personal property, subject to various claims of equipment lenders. The Plaintiff holds General Security Agreements, amongst other security.
5. The Debtor is in default of performance of obligations owed to the Plaintiff as referenced in the Affidavit of Dean Chan, filed.
6. The Plaintiff has made demand for payment, which demand has gone unanswered.
7. Such further and other grounds as counsel may advise.

**Material or evidence to be relied on:**

8. The Affidavit of Dean Chan, filed.
9. Such further and other evidence as counsel may advise.

**Applicable legislation and rules:**

10. Section 243 of the *Bankruptcy and Insolvency Act*, RSC 1985, c. B-3 as amended.
11. Section 13(2) of the *Judicature Act*, RSA 2000, c. J-2 as amended.
12. Section 99(a) of the *Business Corporations Act*, RSA 2000, c. B-9, as amended.
13. Section 55(7) of the *Personal Property Security Act*, RSA 2000, c. P-7, as amended.
14. Alberta Rules of Court Rules 1.3, 1.4, 3.68, 3.73.
15. Such further and other legislation and regulations and rules as counsel may advise and this Honourable Court may permit.

**Any irregularity complained of or objection relied on:**

16. None.

**How the application is proposed to be heard or considered:**

17. Affidavit, evidence and oral argument.

**AFFIDAVIT EVIDENCE IS REQUIRED IF YOU WISH TO OBJECT.**

**WARNING**

If you do not come to Court either in person or by your lawyer, the Court may give the Applicant(s) what they want 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 time shown at the beginning of the form. If you intend to give evidence in response to the application, you must reply by filing an Affidavit or other evidence with the Court and serving a copy of that Affidavit or other evidence on the Applicant(s) a reasonable time before the application is to be heard or considered.