

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

BETWEEN:

ROYAL BANK OF CANADA

**PLAINTIFF**

AND:

2073944 ALBERTA LTD.

**DEFENDANT**

**APPLICATION RESPONSE**

*[Rule 22-3 of the Supreme Court Civil Rules applies to all forms.]*

**Application Response of: Plaintiff, Royal Bank of Canada** (the “Application Respondent”)

THIS IS A RESPONSE TO the Notice of Application of Grant Thornton Limited, Court Appointed Receiver herein, dated September 22, 2020.

**Part 1: ORDERS CONSENTED TO**

The Application Respondent consents to the granting of the orders set out in the following paragraphs of Part 1 of the notice of application on the following terms: **ALL**

**Part 2: ORDERS OPPOSED**

The Application Respondent opposes the granting of the orders set out in the following paragraphs of Part 1 of the notice of application: **NIL**

**Part 3: ORDERS ON WHICH NO POSITION IS TAKEN**

The Application Respondent takes no position on the granting of the orders set out in the following paragraphs of Part 1 of the notice of application: **NIL**

**Part 4: FACTUAL BASIS**

1. The Application Respondent is a secured creditor of the Respondent 2073944 Alberta Ltd.

**Part 5: LEGAL BASIS**

1. The Application Respondent supports the receiver’s application.

**Part 6: MATERIALS TO BE RELIED ON**

1. The pleadings and materials filed herein.

The Application Respondent estimates that the application will take 20 minutes.

The Application Respondent has filed in this proceeding a document that contains the Application Respondent's address for service, which is:

c/o McMillan Dubo LLP  
320 – 301 Victoria Street  
Kamloops, BC, V2C 2A3  
Attention: Sherryl Dubo  
Direct Line: 778-765-1716

Date: September 25, 2020



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Signature of lawyer for Application Respondent  
SHERRYL DUBO

No. VLC-S-S-207422  
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

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**APPLICATION RESPONSE OF THE PLAINTIFF**

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FILE NO. 101-109

SAD/aj

**MCMILLAN DUBO LLP**  
320 – 301 Victoria Street  
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