

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

ROYAL BANK OF CANADA

Petitioner

AND:

2073944 ALBERTA LTD.

Respondent

APPLICATION RESPONSE

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

Application Response of: The Respondent, 2073944 Alberta Ltd. (the “**Application Respondent**”)

THIS IS A RESPONSE TO the Notice of Application of Grant Thornton Limited, Court Appointed Receiver herein, dated September 22, 2020, to be heard on October 6, 2020 (transferred to the Vancouver Registry under Action No. VLC-S-S-207422).

Part 1: ORDERS CONSENTED TO

1. 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: **N/A**

Part 2: ORDERS OPPOSED

2. The Application Respondent opposes the orders set out in Part 1 of the Notice of Application.

Part 3: ORDERS ON WHICH NO POSITION IS TAKEN

3. 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: **N/A**

Part 4: FACTUAL BASIS

4. The Application Respondent relies on the pleadings and proceedings filed in this matter.

Part 5: LEGAL BASIS

5. The Application Respondent submits that the property in question has not been sufficiently marketed under the circumstances and that there is no prejudice in continuing the sales process for further time, as the lands are undeveloped and without cost to maintain.

Part 6: MATERIALS TO BE RELIED ON

6. The pleadings and materials filed herein.

The Application Respondent estimates that the application will take 1 hour.

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

Field LLP
400, 444 – 7 Avenue S.W.
Calgary AB T2P 0X8
Lawyer: Douglas S. Nishimura
Phone Number: (403) 260-8548

Date: October 5, 2020.



Signature of lawyer for the
Application Respondent

NO. SML-S-S-1956999
Smithers Registry

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**APPLICATION RESPONSE OF
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File No. 68608-1