



COURT FILE NUMBER: 1501-11817

COURT: COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE: CALGARY

PLAINTIFFS: EASY LOAN CORPORATION and MIKE TERRIGNO

DEFENDANTS: BASE MORTGAGE & INVESTMENTS LTD. AND BASE FINANCE LTD., ARNOLD BREITKRUETZ, SUSAN BREITKRUETZ, SUSAN WAY AND GP ENERGY INC.

DOCUMENT: APPLICATION

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

**Billington Barristers**  
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File: 15047-001

**NOTICE TO THE RESPONDENT(S): QUINN BREITKREUTZ and RETIREMENT MORTGAGE CORPORATION and BONNIE WAY and JOHN MANOLESCU and KYLE HOGABOAM and DAVIS MANAGEMENT LTD. and EASY LOAN CORPORATION and MIKE TERRIGNO and GUISEPPINA TERRIGNO and MARIA TERRIGNO and INVESTISSEMENT ADMA INC. and BASE MORTGAGE & INVESTMENTS LTD. and BASE FINANCE LTD. and ARNOLD BREITKREUTZ and SUSAN BREITKREUTZ and GP ENERGY INC.**

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

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

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

Date: July 17, 2018  
Time: 2:00 p.m.  
Where: Calgary Courts Centre  
Before: The Honourable Justice B.E.C. Romaine

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

**Remedy claimed or sought: For an Order**

1. Abridging of the time for service if necessary;
2. An Order that Retirement Mortgage Corporation, Bonnie Way, Quinn Breitreutz, John Manolescu and Lyle Hogaboam are in receipt of assets of the Debtors and should be placed into Receivership or subject to such aspects of the Receivership Order as this Honourable Court determines;
3. Approving the actions and fees of the Receiver to date.

**Grounds for making this application:**

4. As established in the Third Report of the Receiver, the Sixth Report of the Receiver and the Supplemental Report to the Sixth Report of the Receiver including to continue investigation of the affairs of the Respondents, Retirement Mortgage Corporation, Bonnie Way, Quinn Breitreutz, John Manolescu and Lyle Hogaboam are in receipt of assets of the Debtors and should be placed into Receivership or subject to such aspects of the Receivership Order as this Honourable Court determines.

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

5. The Third Report of the Receiver, filed May 16, 2016;
6. The Sixth Report of the Receiver, filed August 23, 2017; and
7. The Supplemental Report to the Sixth Report of the Receiver, filed March 14, 2018.

**Applicable rules:**

8. The *Alberta Rules of Court*; and
9. Such further and other rules as counsel may advise.

**Applicable Acts and regulations:**

10. *Bankruptcy and Insolvency Act*, R.S.C. 1985, c B-3;
11. *Land Titles Act*, s.191 R.S.A. 2000 c.L-4 as are;
12. *Judicature Act*, s.13 R.S.A. 2000 c.J-2;

13. *Business Corporations Act*, R.S.A. 2000, c.B-9; and
14. Such further and other Acts and Regulations as counsel may advise.

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

15. N/A

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

16. Before the Honourable Justice B.E.C. Romaine

**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 the 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.