

**2018 01G 3114**  
**SUPREME COURT OF NEWFOUNDLAND AND LABRADOR**  
**IN BANKRUPTCY AND INSOLVENCY**

**IN THE MATTER OF** the *Bankruptcy and Insolvency Act*, RSC 1985 c. B-3, as amended

**AND IN THE MATTER OF** the Receivership of PTL Holdings Limited, PTL Services (Equipment) Limited, CSL Services (Industrial) Limited and 9263357 Canada Inc.

**Estate No. 51-126100**  
**Court No. 21491**

**AFFIDAVIT**

I, Darren D. O'Keefe, Partner of the Law Firm of Cox & Palmer, of St. John's, make oath and say as follows:

1. That I am independent legal counsel for the Court Appointed Receiver, BDO Canada Ltd. (the "**Receiver**") in the within action. In this affidavit I refer to PTL Holdings Limited as "**PTL Holdings**", PTL Services (Equipment) Limited as "**PTL Services**", CSL Services (Industrial) Limited as "**CSL**" and 9263357 Canada Inc. as "**926 Canada**" and to the companies together as the "**PTL Group**".
2. That on August 1<sup>st</sup>, 2018, I sent a copy of the within application and the First Report of the Receiver, along with its schedules, to the following people by email, at the times and addresses noted:

<b>Name:</b>	<b>Method of Delivery [Time/Date of Delivery]</b>	<b>Address:</b>
CIBC	Email August 1, 2018 [3:15 p.m.]	Sopria Sarin (CIBC) and Carl Holm (Counsel) by email at: <b>cholm@wickwireholm.com</b> <b>supriya.sarin@cibc.com</b>
VTB Holders	Email August 1, 2018 [5:23 p.m.]	To their counsel, William Boyd, at: <b>william.boyd@mcinnescooper.com</b>
Canada Revenue Agency	Email August 1, 2018 [4:54 p.m.]	To: Insolvency Document Processing Center: <b>CRA-ARC_TAX-FISC_INS_T-F_G@cra-arc.gc.ca</b>
Government of	Email	To: Lisa Warren, Manager of Collections,

Newfoundland and Labrador (HAPSET)	August 1, 2018 [5:26 p.m.]	Tax Accounting and Services <b>LisaWarren@gov.nl.ca</b>
Workplace NL	Email August 1, 2018 [5:31 p.m.]	To: General Inquiries <b>general.inquiries@workplacnl.ca</b>
The Owners of PTL Group	Email August 1, 2018 [10:42 a.m.]	To their counsel, Gregory Connors and Geoff Spencer, McInnes Cooper at: <b>gregory.connors@mcinnescooper.com</b> and: <b>geoffrey.spencer@mcinnescooper.com</b>
Terry King and Greg Drodge	Email August 1, 2018 [10:42 a.m.]	To: <b>Terry.King@talonenergyservices.ca</b> <b>Greg.Drodge@talonenergyservices.ca</b>
Boilermakers Local 203	Email August 1, 2018 [4:12 p.m.]	Union Representative, Gerry Flaherty, at: <b>jflaherty@boilermaker.ca</b>
International Union of Operating Engineers Local 904	Email August 1, 2018 [4:12 p.m.]	Union Representative, Terence Hickey, at: <b>terrence@iuoe904.com</b>
Labour's International Local 1208	Email August 1, 2018 [4:12 p.m.]	Union Representative, Joe Whiffen, at: <b>dhennessy@liuna1208.nf.ca</b>
Teamsters Local 855	Email August 1, 2018 [4:12 p.m.]	Union Representative, Rick Gill at: <b>rgill@teamstersL855.com</b>
Carpenters Local 579	Email August 1, 2018 [4:12 p.m.]	Union Representative, Ivan Gedge, at: <b>igedge@acrc.ca</b>
International Brotherhood of Electrical Workers Local 16209	Email August 1, 2018 [4:12 p.m.]	Union Representative, Rick Fudge, at: <b>rick@ibew1620.com</b>
Iron Workers Local 764	Email August 1, 2018 [4:12 p.m.]	Union Representative, Tom Woodford, at: <b>tom.w@nf.sympatico.ca</b>
United Steel Workers Union Local 9097	Email August 1, 2018 [4:12 p.m.]	Union Representative, Boyd Bussey, at: <b>bbussey@usw.ca</b>
Locke's Electrical Ltd.	Email August 1, 2018 [4:40 p.m.]	To their counsel, Katrina Warren, at: <b>kwarren@kingpenney.com</b>

Copies of the email correspondence referred to above are attached hereto as **Exhibit "A"**.

3. That on July 30<sup>th</sup>, 2018, I received an email from Mr. Gregory Connors, solicitor at McInnes Cooper, who requested that I send a copy of the within application and

Receivers Report to him on behalf of his client, the “current owners of PTL”. Terry King and Greg Drodge were copied on this email, attached hereto as **Exhibit “B”**.

4. That on August 1<sup>st</sup>, 2018, I emailed a copy of the within application and Receivers Report to Mr. Connors as requested on behalf of the current owners of PTL. A copy of that email is attached as **Exhibit “C”**. The Receiver followed up with a second email, including the same documents, and copying Mr. King and Mr. Drodge. A copy of this second email is attached hereto as **Exhibit “D”**.
5. That at all material times, up to and including July 19<sup>th</sup>, 2018, Mr. Connors was acting as solicitor for 81966 Newfoundland and Labrador Inc. (“**81966**”). By way of illustration, some of Mr. Connors emails to the Receiver, on behalf of 81966, are attached hereto as **Exhibit “E”**.
6. As set out in the Receivers Report, filed with this Honourable Court, 81966 made a bid for the assets of PTL in an amount of approximately \$6.8m, which was rejected by the Receiver. The emails attached hereto as Exhibit “E”, referred to above, document the discussion regarding the return of the deposit on the failed bid.
7. That based on the CADO Searches (referred to below) the principal directors of 81966 are Mr. King and Mr. Drodge. Mr. King and Mr. Drodge are also among the principal directors of the PTL Group.
8. That on August 2<sup>nd</sup>, 2018, I emailed Mr. Connors and asked if he would accept service on behalf of 81966, given his recent representation of that Company in dealings with the Receiver. Mr. Connors replied on the same day indicating that he had no instructions to accept service on behalf of 81966. This email exchange is attached hereto as **Exhibit “F”**.
9. That on August 2<sup>nd</sup>, 2018, I caused the Receivers Report to be delivered to Workplace NL, and the Government of Newfoundland and Labrador, Department of Finance (with respect to Health and Post-Secondary Education Tax) by process server. Confirmation of delivery is attached hereto as **Exhibit “G”**. As indicated above, these documents were also sent by email on August 1<sup>st</sup>, 2018.
10. That on August 3<sup>rd</sup>, 2018, I caused the following documents to be retrieved from the Companies and Deeds Online (CADO) Registry for the Province of Newfoundland and Labrador:

Company Name	Document	Date
PTL Holdings Ltd.	Detailed Company Information	03 August 2018
PTL Services (Equipment) Ltd.	Detailed Company Information	03 August 2018
CSL Services (Industrial) Ltd.	Detailed Company Information	03 August 2018

9263357 Canada Inc.	Detailed Company Information	03 August 2018
81966 Newfoundland and Labrador Inc.	Detailed Company Information	03 August 2018

The foregoing documents are attached hereto as **Exhibit "H"**.

11. That on August 2<sup>nd</sup>, 2018, I was provided with an email from the Canadian Imperial Bank of Commerce confirming their agreement to the within application. This email is attached hereto as **Exhibit "I"**.
12. That on August 3<sup>rd</sup>, 2018, I was provided with an email from William Boyd, Partner at McInnes Cooper who represents the **"VTB Holders"** as the other senior secured creditor confirming his client is not opposed to the within application. A copy of this email is attached hereto as **Exhibit "J"**.
13. That as of the date hereof, I have not received any objection from any creditor of the PTL Group with respect to the within application.
14. I swear this Affidavit conscientiously, knowing it is an offence to falsely swear an affidavit.

[the remainder of this page intentionally left blank, signature page follows]

SWORN TO/AFFIRMED at  
St. John's this 3 day of  
Aug, 2018 before me:

  
Barrister & Solicitor NL

  
DARREN D. O'KEEFE

THIS IS EXHIBIT "A" TO  
THE AFFIDAVIT OF

Darren O'Keefe

Sworn to before me  
this 3 day of aug, 2018

[Signature]  
Barrister & Solicitor NL

## Philpott, Allison (St. John's)

---

**From:** O'Keefe, Darren (St. John's)  
**Sent:** Wednesday, August 01, 2018 5:32 PM  
**To:** [general.inquiries@workplacenl.ca](mailto:general.inquiries@workplacenl.ca)  
**Cc:** Philpott, Allison (St. John's); Phil Clarke (PClarke@bdo.ca)  
**Subject:** Re: PTL Group (In Receivership) - Notice Re: WORKPLACE NL  
**Attachments:** PTL Group First Report to the Court.pdf; BDO - Exhibit A (2).zip; BDO - Exhibit C to P.zip; PTL Holdings Ltd. - Application for Vesting Order [AS FILED] 17'Jul'18.pdf

CONFIDENTIAL

**NOTICE Re: Workplace NL**

**Re: Receivership of PTL Holdings Ltd., PTL Services (Equipment) Limited, CSL Services (Industrial) Limited, and 9263357 Canada Inc.**

**BY EMAIL AND FAX**

146 - 148 Forest Rd.

St. John's

Fax: 709-738-1714

[general.inquiries@workplacenl.ca](mailto:general.inquiries@workplacenl.ca)

To Whom it May Concern:

We write as independent counsel to BDO Canada Ltd., in its capacity as Receiver of PTL Holdings Ltd., PTL Services (Equipment) Limited, CSL Services (Industrial) Limited, and 9263357 Canada Inc. (collectively, the "PTL Group"). BDO have directed us to send this email to you, as you may be a person interested in the Court proceedings involving the PTL Group.

Please find the following documents attached hereto:

1. Application of the Receiver for a Vesting Order, approving the sale of substantially all of the assets of the PTL Group as a going concern, which is set for a hearing at the Supreme Court of Newfoundland and Labrador, Duckworth Street, St. John's, at **10:00 a.m. on August 6<sup>th</sup>**; and
2. The 1<sup>st</sup> Report of the Receiver (with attachments in zip folders).

We trust you will find the attached to be in order.

**Darren O'Keefe** | Cox & Palmer | Partner

**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)

**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

## O'Keefe, Darren (St. John's)

---

**From:** Sarin, Supriya <Supriya.Sarin@cibc.com>  
**Sent:** Thursday, August 02, 2018 6:02 PM  
**To:** O'Keefe, Darren (St. John's); cholm@wickwireholm.com  
**Cc:** Phil Clarke (PClarke@bdo.ca); Philpott, Allison (St. John's); Consoli, Angelo; Ravani, Pathik; Echeverri, Mauricio  
**Subject:** RE: PTL Group (In Receivership)

Hi Darren,

Thank you for the 1<sup>st</sup> report of the Receiver and the Sale Approval materials. CIBC has reviewed and supports the Receiver's application.

Regards,

**Supriya Sarin** | Senior Director, CIBC, Special Loans, Head Office | **Risk Management** | 25 King Street West, 16th Floor, Toronto, ON M5L 2A1 | Telephone: 416.304.8609 Fax: 416.214.8749 | [supriya.sarin@cibc.com](mailto:supriya.sarin@cibc.com)



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---

**From:** O'Keefe, Darren (St. John's) [<mailto:dokeefe@coxandpalmer.com>]  
**Sent:** Wednesday, August 01, 2018 3:15 PM  
**To:** Sarin, Supriya; cholm@wickwireholm.com  
**Cc:** Phil Clarke (PClarke@bdo.ca); Philpott, Allison (St. John's)  
**Subject:** Re: PTL Group (In Receivership)

Good afternoon, Ms. Sarin and Mr. Holm:

We write as independent counsel to BDO Canada Ltd., in its capacity as Receiver of PTL Holdings Ltd., PTL Services (Equipment) Limited, CSL Services (Industrial) Limited, and 9263357 Canada Inc. (collectively, the "PTL Group"). BDO have directed us to send this email CIBC and counsel, as the senior secured creditor of the PTL Group who may have an interest in these proceedings.

Please find the following documents attached hereto:

1. Application of the Receiver for a Vesting Order, approving the sale of substantially all of the assets of the PTL Group as a going concern, which is set for a hearing at the Supreme Court of Newfoundland and Labrador, Duckworth Street, St. John's, at **10:00 a.m. on August 6<sup>th</sup>**; and
2. The 1<sup>st</sup> Report of the Receiver (with attachments in zip folders).

We trust you will find the attached to be in order. If you have any questions please let me know.

Regards,



Darren

**Darren O'Keefe** | Cox & Palmer | Partner

**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)

**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

## O'Keefe, Darren (St. John's)

---

**From:** Boyd, William <william.boyd@mcinnescooper.com>  
**Sent:** Friday, August 03, 2018 8:42 AM  
**To:** O'Keefe, Darren (St. John's)  
**Cc:** Philpott, Allison (St. John's); Phil Clarke (PClarke@bdo.ca)  
**Subject:** RE: PTL Group (In Receivership) [IWOV-Active.FID3847404]

Good morning Darren,

I have spoken with Kevin Parsons this AM on behalf of the Parsons family and he has instructed me to advise you that the Parsons family are not opposing the application and will not be appearing at the hearing currently scheduled for Monday, August 6<sup>th</sup>.

Bill

**From:** O'Keefe, Darren (St. John's) <dokeefe@coxandpalmer.com>  
**Sent:** Wednesday, August 1, 2018 5:23 PM  
**To:** Boyd, William <william.boyd@mcinnescooper.com>  
**Cc:** Philpott, Allison (St. John's) <aphilpott@coxandpalmer.com>; Phil Clarke (PClarke@bdo.ca) <PClarke@bdo.ca>  
**Subject:** Re: PTL Group (In Receivership)

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

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Mr. Boyd:

We write as independent counsel to BDO Canada Ltd., in its capacity as Receiver of PTL Holdings Ltd., PTL Services (Equipment) Limited, CSL Services (Industrial) Limited, and 9263357 Canada Inc. (collectively, the "PTL Group"). BDO have directed us to send this email to you, as counsel for the Parsons Vendors (VTB Holders), as referenced in the application for Receivership granted May 11<sup>th</sup>, 2018, on which we understand you were counsel of record.

Please find the following documents attached hereto:

1. Application of the Receiver for a Vesting Order, approving the sale of substantially all of the assets of the PTL Group as a going concern, which is set for a hearing at the Supreme Court of Newfoundland and Labrador, Duckworth Street, St. John's, at **10:00 a.m. on August 6<sup>th</sup>**; and
2. The 1<sup>st</sup> Report of the Receiver (with attachments in zip folders).

We trust you will find the attached to be in order.

Regards,  
Darren

**Darren O'Keefe** | Cox & Palmer | Partner  
**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)  
**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

**Notice** This communication, including any attachments, is confidential and may be protected by solicitor/client privilege. It is intended only for the person or persons to whom it is addressed. If you have received this e-mail in error, please notify the sender by e-mail or telephone at McInnes Cooper's expense. **Avis** Les informations contenues dans ce courriel, y compris toute(s) pièce(s) jointe(s), sont confidentielles et peuvent faire l'objet d'un privilège avocat-client. Les informations sont dirigées au(x) destinataire(s) seulement. Si vous avez reçu ce courriel par erreur, veuillez en aviser l'expéditeur par courriel ou par téléphone, aux frais de McInnes Cooper.

**O'Keefe, Darren (St. John's)**

---

**From:** O'Keefe, Darren (St. John's)  
**Sent:** Wednesday, August 01, 2018 5:31 PM  
**To:** 'general.inquiries@workplacenl.ca'  
**Cc:** Philpott, Allison (St. John's); Phil Clarke (PClarke@bdo.ca)  
**Subject:** Re: PTL Group (In Receivership) - Notice Re: WORKPLACE NL  
**Attachments:** PTL Group First Report to the Court.pdf; BDO - Exhibit A (2).zip; BDO - Exhibit C to P.zip; PTL Holdings Ltd. - Application for Vesting Order [AS FILED] 17'Jul'18.pdf

CONFIDENTIAL

**NOTICE Re: Workplace NL**

**Re: Receivership of PTL Holdings Ltd., PTL Services (Equipment) Limited, CSL Services (Industrial) Limited, and 9263357 Canada Inc.**

**BY EMAIL AND FAX**

146 - 148 Forest Rd.

St. John's

Fax: 709-738-1714

[general.inquiries@workplacenl.ca](mailto:general.inquiries@workplacenl.ca)

To Whom it May Concern:

We write as independent counsel to BDO Canada Ltd., in its capacity as Receiver of PTL Holdings Ltd., PTL Services (Equipment) Limited, CSL Services (Industrial) Limited, and 9263357 Canada Inc. (collectively, the "PTL Group"). BDO have directed us to send this email to you, as you may be a person interested in the Court proceedings involving the PTL Group.

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2. The 1<sup>st</sup> Report of the Receiver (with attachments in zip folders).

We trust you will find the attached to be in order.

**Darren O'Keefe** | Cox & Palmer | Partner

**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)

**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

## O'Keefe, Darren (St. John's)

---

**From:** O'Keefe, Darren (St. John's)  
**Sent:** Wednesday, August 01, 2018 5:26 PM  
**To:** 'LisaWarren@gov.nl.ca'  
**Cc:** Philpott, Allison (St. John's); Phil Clarke (PClarke@bdo.ca)  
**Subject:** Re: PTL Group (In Receivership) - Notice Re: HAPSET  
**Attachments:** PTL Group First Report to the Court.pdf; BDO - Exhibit A (2).zip; BDO - Exhibit C to P.zip; PTL Holdings Ltd. - Application for Vesting Order [AS FILED] 17'Jul'18.pdf

**NOTICE Re: Health and Post Secondary Education Tax  
Re: Receivership of PTL Holdings Ltd., PTL Services (Equipment) Limited, CSL Services (Industrial) Limited,  
and 9263357 Canada Inc.**

### BY EMAIL AND FAX

Tax Administration Division  
Manager of Collections, Tax Accounting and Services  
P.O. Box 8700  
3rd Floor, East Block, Confederation Building  
St. John's, NL A1B 4J6  
Tel: (709) 729-6254  
**Attn: Lisa Warren**  
Email: [LisaWarren@gov.nl.ca](mailto:LisaWarren@gov.nl.ca)  
Fax: (709) 729-2856

### To Whom it May Concern:

We write as independent counsel to BDO Canada Ltd., in its capacity as Receiver of PTL Holdings Ltd., PTL Services (Equipment) Limited, CSL Services (Industrial) Limited, and 9263357 Canada Inc. (collectively, the "PTL Group"). BDO have directed us to send this email to you, as you may be a person interested in the Court proceedings involving the PTL Group.

Please find the following documents attached hereto:

1. Application of the Receiver for a Vesting Order, approving the sale of substantially all of the assets of the PTL Group as a going concern, which is set for a hearing at the Supreme Court of Newfoundland and Labrador, Duckworth Street, St. John's, at **10:00 a.m. on August 6<sup>th</sup>**; and
2. The 1<sup>st</sup> Report of the Receiver (with attachments in zip folders).

We trust you will find the attached to be in order.

**Darren O'Keefe** | Cox & Palmer | Partner  
**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)  
**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

**O'Keefe, Darren (St. John's)**

---

**From:** O'Keefe, Darren (St. John's)  
**Sent:** Wednesday, August 01, 2018 4:52 PM  
**To:** 'CRA-ARC\_TAX-FISC\_INS\_T-F\_G@cra-arc.gc.ca'  
**Cc:** Phil Clarke (PClarke@bdo.ca); Philpott, Allison (St. John's)  
**Subject:** PTL Group (In Receivership) [1 of 4] Estate 51-126100  
**Attachments:** PTL Holdings Ltd. - Application for Vesting Order [AS FILED] 17'Jul'18.pdf

**To: CANADA REVENUE AGENCY**  
**Insolvency Document Processing Center**  
**Re: Estate No. 51-126100**

Reference is made to your submission policy found at [https://www.ic.gc.ca/eic/site/bsf-osb.nsf/eng/br02498.html#Appendix A](https://www.ic.gc.ca/eic/site/bsf-osb.nsf/eng/br02498.html#Appendix_A) which sets out the following address for service:

CRA-ARC TAX-FISC INS T-F G@cra-arc.gc.ca

**This email is 1 of 4, with two more following as per your guidelines.**

We write as independent counsel to BDO Canada Ltd., in its capacity as Receiver of PTL Holdings Ltd., PTL Services (Equipment) Limited, CSL Services (Industrial) Limited, and 9263357 Canada Inc. (collectively, the "PTL Group").

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2. The 1<sup>st</sup> Report of the Receiver (with attachments in zip folders) to follow.

We trust you will find the attached to be in order.

Regards,  
Darren

**Darren O'Keefe** | Cox & Palmer | Partner  
**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)  
**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

## **O'Keefe, Darren (St. John's)**

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**Sent:** Wednesday, August 01, 2018 4:53 PM  
**To:** 'CRA-ARC\_TAX-FISC\_INS\_T-F\_G@cra-arc.gc.ca'  
**Cc:** Phil Clarke (PClarke@bdo.ca); Philpott, Allison (St. John's)  
**Subject:** RE: PTL Group (In Receivership) [2 of 4] Estate 51-126100  
**Attachments:** PTL Group First Report to the Court.pdf

We refer to the email below.

2 of 4.

**Darren O'Keefe** | Cox & Palmer | Partner  
**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)  
**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

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---

**From:** O'Keefe, Darren (St. John's)  
**Sent:** Wednesday, August 01, 2018 4:52 PM  
**To:** 'CRA-ARC\_TAX-FISC\_INS\_T-F\_G@cra-arc.gc.ca'  
**Cc:** Phil Clarke (PClarke@bdo.ca); Philpott, Allison (St. John's)  
**Subject:** PTL Group (In Receivership) [1 of 4] Estate 51-126100

**To:** CANADA REVENUE AGENCY  
**Insolvency Document Processing Center**  
**Re:** Estate No. 51-126100

Reference is made to your submission policy found at [https://www.ic.gc.ca/eic/site/bsf-osb.nsf/eng/br02498.html#Appendix\\_A](https://www.ic.gc.ca/eic/site/bsf-osb.nsf/eng/br02498.html#Appendix_A) which sets out the following address for service:

[CRA-ARC\\_TAX-FISC\\_INS\\_T-F\\_G@cra-arc.gc.ca](mailto:CRA-ARC_TAX-FISC_INS_T-F_G@cra-arc.gc.ca)

**This email is 1 of 4, with two more following as per your guidelines.**

We write as independent counsel to BDO Canada Ltd., in its capacity as Receiver of PTL Holdings Ltd., PTL Services (Equipment) Limited, CSL Services (Industrial) Limited, and 9263357 Canada Inc. (collectively, the "PTL Group").

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2. The 1<sup>st</sup> Report of the Receiver (with attachments in zip folders) to follow.

We trust you will find the attached to be in order.

Regards,  
Darren

**Darren O'Keefe** | Cox & Palmer | Partner

**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)

**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6



## O'Keefe, Darren (St. John's)

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**From:** O'Keefe, Darren (St. John's)  
**Sent:** Wednesday, August 01, 2018 4:54 PM  
**To:** 'CRA-ARC\_TAX-FISC\_INS\_T-F\_G@cra-arc.gc.ca'  
**Cc:** Phil Clarke (PClarke@bdo.ca); Philpott, Allison (St. John's)  
**Subject:** RE: PTL Group (In Receivership) [3 of 4] Estate 51-126100  
**Attachments:** BDO - Exhibit A (2).zip

We refer to the email below.

3 of 4.

**Darren O'Keefe** | Cox & Palmer | Partner  
**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)  
**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

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**From:** O'Keefe, Darren (St. John's)  
**Sent:** Wednesday, August 01, 2018 4:52 PM  
**To:** 'CRA-ARC\_TAX-FISC\_INS\_T-F\_G@cra-arc.gc.ca'  
**Cc:** Phil Clarke (PClarke@bdo.ca); Philpott, Allison (St. John's)  
**Subject:** PTL Group (In Receivership) [1 of 4] Estate 51-126100

**To: CANADA REVENUE AGENCY**  
**Insolvency Document Processing Center**  
**Re: Estate No. 51-126100**

Reference is made to your submission policy found at [https://www.ic.gc.ca/eic/site/bsf-osb.nsf/eng/br02498.html#Appendix\\_A](https://www.ic.gc.ca/eic/site/bsf-osb.nsf/eng/br02498.html#Appendix_A) which sets out the following address for service:

[CRA-ARC\\_TAX-FISC\\_INS\\_T-F\\_G@cra-arc.gc.ca](mailto:CRA-ARC_TAX-FISC_INS_T-F_G@cra-arc.gc.ca)

**This email is 1 of 4, with two more following as per your guidelines.**

We write as independent counsel to BDO Canada Ltd., in its capacity as Receiver of PTL Holdings Ltd., PTL Services (Equipment) Limited, CSL Services (Industrial) Limited, and 9263357 Canada Inc. (collectively, the "PTL Group").

Please find the following documents attached hereto:

1. Application of the Receiver for a Vesting Order, approving the sale of substantially all of the assets of the PTL Group as a going concern, which is set for a hearing at the Supreme Court of Newfoundland and Labrador, Duckworth Street, St. John's, at **10:00 a.m. on August 6<sup>th</sup>**; and
2. The 1<sup>st</sup> Report of the Receiver (with attachments in zip folders) to follow.

We trust you will find the attached to be in order.

Regards,  
Darren

**Darren O'Keefe** | Cox & Palmer | Partner  
**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)  
**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

## O'Keefe, Darren (St. John's)

---

**From:** O'Keefe, Darren (St. John's)  
**Sent:** Wednesday, August 01, 2018 4:55 PM  
**To:** 'CRA-ARC\_TAX-FISC\_INS\_T-F\_G@cra-arc.gc.ca'  
**Cc:** Phil Clarke (PClarke@bdo.ca); Philpott, Allison (St. John's)  
**Subject:** RE: PTL Group (In Receivership) [4 of 4] Estate 51-126100  
**Attachments:** BDO - Exhibit C to P.ZIP

We refer to the email below.

4 of 4.

**Darren O'Keefe** | Cox & Palmer | Partner  
**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)  
**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

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**To:** 'CRA-ARC\_TAX-FISC\_INS\_T-F\_G@cra-arc.gc.ca'  
**Cc:** Phil Clarke (PClarke@bdo.ca); Philpott, Allison (St. John's)  
**Subject:** PTL Group (In Receivership) [1 of 4] Estate 51-126100

**To:** CANADA REVENUE AGENCY  
**Insolvency Document Processing Center**  
**Re: Estate No. 51-126100**

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**This email is 1 of 4, with two more following as per your guidelines.**

We write as independent counsel to BDO Canada Ltd., in its capacity as Receiver of PTL Holdings Ltd., PTL Services (Equipment) Limited, CSL Services (Industrial) Limited, and 9263357 Canada Inc. (collectively, the "PTL Group").

Please find the following documents attached hereto:

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2. The 1<sup>st</sup> Report of the Receiver (with attachments in zip folders) to follow.

We trust you will find the attached to be in order.

Regards,  
Darren

**Darren O'Keefe** | Cox & Palmer | Partner

**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)

**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

## O'Keefe, Darren (St. John's)

---

**From:** O'Keefe, Darren (St. John's)  
**Sent:** Wednesday, August 01, 2018 4:44 PM  
**To:** 'supriya.sarin@cibc.com'; cholm@wickwireholm.com  
**Cc:** Phil Clarke (PClarke@bdo.ca); Philpott, Allison (St. John's)  
**Subject:** Re: PTL Group (In Receivership)  
**Attachments:** PTL Group First Report to the Court.pdf; BDO - Exhibit A (2).zip; BDO - Exhibit C to P.zip; PTL Holdings Ltd. - Application for Vesting Order [AS FILED] 17-Jul'18.pdf

Good afternoon, Ms. Sarin and Mr. Holm:

We write as independent counsel to BDO Canada Ltd., in its capacity as Receiver of PTL Holdings Ltd., PTL Services (Equipment) Limited, CSL Services (Industrial) Limited, and 9263357 Canada Inc. (collectively, the "PTL Group"). BDO have directed us to send this email CIBC and counsel, as the senior secured creditor of the PTL Group who may have an interest in these proceedings.

Please find the following documents attached hereto:

1. Application of the Receiver for a Vesting Order, approving the sale of substantially all of the assets of the PTL Group as a going concern, which is set for a hearing at the Supreme Court of Newfoundland and Labrador, Duckworth Street, St. John's, at **10:00 a.m. on August 6<sup>th</sup>**; and
2. The 1<sup>st</sup> Report of the Receiver (with attachments in zip folders).

We trust you will find the attached to be in order. If you have any questions please let me know.

Regards,  
Darren

**Darren O'Keefe** | Cox & Palmer | Partner  
**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)  
**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

## O'Keefe, Darren (St. John's)

---

**From:** O'Keefe, Darren (St. John's)  
**Sent:** Wednesday, August 01, 2018 4:40 PM  
**To:** 'kwarren@kingpenney.com'  
**Cc:** Philpott, Allison (St. John's); Phil Clarke (PClarke@bdo.ca)  
**Subject:** Re: PTL Group (In Receivership)  
**Attachments:** PTL Group First Report to the Court.pdf; BDO - Exhibit A (2).zip; BDO - Exhibit C to P.zip; PTL Holdings Ltd. - Application for Vesting Order [AS FILED] 17'Jul'18.pdf

Katrina,

We write as independent counsel to BDO Canada Ltd., in its capacity as Receiver of PTL Holdings Ltd., PTL Services (Equipment) Limited, CSL Services (Industrial) Limited, and 9263357 Canada Inc. (collectively, the "PTL Group"). BDO have directed us to send this email to you, as counsel for Locke's Electrical Ltd.

Please find the following documents attached hereto:

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2. The 1<sup>st</sup> Report of the Receiver (with attachments in zip folders).

We trust you will find the attached to be in order.

Regards,  
Darren

**Darren O'Keefe** | Cox & Palmer | Partner  
**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)  
**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

THIS IS EXHIBIT "B" TO  
THE AFFIDAVIT OF

Darren O'Meara

Sworn to before me  
this 3 day of aug, 20 18

[Signature]

Solicitor & Barrister NL

## Philpott, Allison (St. John's)

---

**From:** O'Keefe, Darren (St. John's)  
**Sent:** Friday, August 03, 2018 11:28 AM  
**To:** Philpott, Allison (St. John's)  
**Subject:** Re: [EXT] RE: PTL Sale [IWOV-Active.FID3846845]  
**Attachments:** Application for Vesting Order.pdf

**From:** Clarke, Philip [mailto:PClarke@bdo.ca]  
**Sent:** Wednesday, August 01, 2018 10:42 AM  
**To:** Connors, Gregory  
**Cc:** O'Keefe, Darren (St. John's); Terry King (terry.king@talonenergyservices.ca); Greg Drodge; Spencer, Geoffrey  
**Subject:** RE: [EXT] RE: PTL Sale [IWOV-Active.FID3846845]

Greg:

Here is a copy of the application for the vesting order made.

Regards,

Phil Clarke, CPA, CA, CIRP, LIT  
Partner/ Associe  
BDO Canada LLP/s.r.l./S.E.N.C.R.L.  
Direct/ligne directe: 902-422-1219  
Mobile/ligne mobile: 902-293-9119  
pclarke@bdo.ca

255 Lacewood Drive, Suite 201  
Halifax, NS B3M 4G2  
Canada  
Tel/Tél.: 902-425-3100  
Fax/Télé.: 902-425-3777  
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**From:** Connors, Gregory <gregory.connors@mcinnescooper.com>  
**Sent:** Monday, July 30, 2018 5:41 PM  
**To:** Clarke, Philip <PClarke@bdo.ca>  
**Cc:** dokeefe@coxandpalmer.com; Terry King (terry.king@talonenergyservices.ca) <terry.king@talonenergyservices.ca>; Greg Drodge <Greg.Drodge@talonenergyservices.ca>; Spencer, Geoffrey <geoffrey.spencer@mcinnescooper.com>  
**Subject:** Re: [EXT] RE: PTL Sale [IWOV-Active.FID3846845]

Phil, I believe you were going to look into getting me a copy of the application which is been filed for hearing tomorrow. I have not heard back from Daren since my email this morning. Can you please advise.

Greg Connors  
McInnes Cooper

On Jul 30, 2018, at 5:05 PM, Clarke, Philip <PClarke@bdo.ca> wrote:



Greg:

The application is not ex parte, can't be. Correct. The Receiver's report is not yet complete. I am hoping to have it done for Wednesday.

Cheers!

Phil Clarke, CPA, CA, CIRP, LIT  
Partner/ Associe  
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[pclarke@bdo.ca](mailto:pclarke@bdo.ca)

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Canada  
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<image002.jpg>

**From:** Connors, Gregory <[gregory.connors@mcinnescooper.com](mailto:gregory.connors@mcinnescooper.com)>  
**Sent:** Monday, July 30, 2018 1:19 PM  
**To:** [dokeefe@coxandpalmer.com](mailto:dokeefe@coxandpalmer.com)  
**Cc:** Clarke, Philip <[PClarke@bdo.ca](mailto:PClarke@bdo.ca)>; Terry King ([terry.king@talonenergyservices.ca](mailto:terry.king@talonenergyservices.ca))  
<[terry.king@talonenergyservices.ca](mailto:terry.king@talonenergyservices.ca)>; Greg Drodge <[Greg.Drodge@talonenergyservices.ca](mailto:Greg.Drodge@talonenergyservices.ca)>; Spencer,  
Geoffrey <[geoffrey.spencer@mcinnescooper.com](mailto:geoffrey.spencer@mcinnescooper.com)>  
**Subject:** [EXT] RE: PTL Sale [IWOV-Active.FID3846845]

Hi Darren,

I spoke with Phil this afternoon who indicated the receiver has filed an application to set a date for the full hearing on the proposed sale of PTL assets. I understood from Phil that the application is *ex parte*. Could you make arrangements to send myself and Geoff Spencer with a copy of the materials filed (we act for the current owners of PTL) and also advise on when we can expect to receive the full suite of materials including the receiver's report (which Phil advises is not yet complete).

Greg

<image003.png>

**Gregory J. Connors**  
Board Director/Partner  
McInnes Cooper  
  
tel +1 (709) 724 8264 | fax +1 (709) 722 1763  
  
5th Floor  
10 Fort William Place  
PO Box 5939 St. John's, NL, A1C 5X4  
  
asst Donna Brown | +1 (709) 724 3626

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BDO est la marque utilisée pour désigner le réseau BDO et chacune de ses sociétés membres.

THIS IS EXHIBIT "C" TO  
THE AFFIDAVIT OF

Darren O'Keefe

Sworn to before me  
this 3 day of Aug, 2018



Barrister Solicitor NL

## Philpott, Allison (St. John's)

---

**From:** O'Keefe, Darren (St. John's)  
**Sent:** Wednesday, August 01, 2018 1:10 AM  
**To:** Connors, Gregory  
**Cc:** Spencer, Geoffrey; Philpott, Allison (St. John's)  
**Subject:** RE: PTL Group (In Receivership)  
**Attachments:** PTL Group First Report to the Court.pdf; BDO - Exhibit A (2).zip; BDO - Exhibit C to P.zip; PTL Holdings Ltd. - Application for Vesting Order [AS FILED] 17'Jul'18.pdf

Greg,

Please find the following documents attached:

1. Application of the Receiver for a Vesting Order, which was set down today for a hearing at 10:00 a.m. on August 6<sup>th</sup>;
2. 1<sup>st</sup> Report of the Receiver (with attachments in zip folders); and

Please let me know if you have any questions.

Regards,  
Darren

**Darren O'Keefe** | Cox & Palmer | Partner  
**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)  
**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

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---

**From:** Connors, Gregory [mailto:[gregory.connors@mcinnescooper.com](mailto:gregory.connors@mcinnescooper.com)]  
**Sent:** Monday, July 30, 2018 6:11 PM  
**To:** Clarke, Philip  
**Cc:** O'Keefe, Darren (St. John's); Terry King ([terry.king@talonenergyservices.ca](mailto:terry.king@talonenergyservices.ca)); Greg Drodge; Spencer, Geoffrey  
**Subject:** Re: [EXT] RE: PTL Sale [IWOV-Active.FID3846845]

Phil, I believe you were going to look into getting me a copy of the application which is been filed for hearing tomorrow. I have not heard back from Daren since my email this morning. Can you please advise.

Greg Connors  
McInnes Cooper

On Jul 30, 2018, at 5:05 PM, Clarke, Philip <[PClarke@bdo.ca](mailto:PClarke@bdo.ca)> wrote:


Greg:

The application is not ex parte, can't be. Correct. The Receiver's report is not yet complete. I am hoping to have it done for Wednesday.

Cheers!

Phil Clarke, CPA, CA, CIRP, LIT  
Partner/ Associe  
BDO Canada LLP/s.r.l./S.E.N.C.R.L.  
Direct/ligne directe: 902-422-1219  
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<image002.jpg>

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**Sent:** Monday, July 30, 2018 1:19 PM  
**To:** [dokeefe@coxandpalmer.com](mailto:dokeefe@coxandpalmer.com)  
**Cc:** Clarke, Philip <[PClarke@bdo.ca](mailto:PClarke@bdo.ca)>; Terry King ([terry.king@talonenergyservices.ca](mailto:terry.king@talonenergyservices.ca))  
<[terry.king@talonenergyservices.ca](mailto:terry.king@talonenergyservices.ca)>; Greg Drodge <[Greg.Drodge@talonenergyservices.ca](mailto:Greg.Drodge@talonenergyservices.ca)>; Spencer, Geoffrey <[geoffrey.spencer@mcinnescooper.com](mailto:geoffrey.spencer@mcinnescooper.com)>  
**Subject:** [EXT] RE: PTL Sale [IWOV-Active.FID3846845]

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Greg

<image003.png>

**Gregory J. Connors**  
Board Director/Partner  
McInnes Cooper  
  
tel +1 (709) 724 8264 | fax +1 (709) 722 1763  
  
5th Floor  
10 Fort William Place  
PO Box 5939 St. John's, NL, A1C 5X4  
  
asst Donna Brown | +1 (709) 724 3626

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seulement. Si vous avez reçu ce courriel par erreur, veuillez en aviser l'expéditeur par courriel ou par téléphone, aux frais de McInnes Cooper.

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THIS IS EXHIBIT "D" TO  
THE AFFIDAVIT OF

Darren O'Keefe

Sworn to before me  
this 3 day of aug, 20 18



Barrister & Solicitor NL

## Philpott, Allison (St. John's)

---

**From:** O'Keefe, Darren (St. John's)  
**Sent:** Friday, August 03, 2018 11:28 AM  
**To:** Philpott, Allison (St. John's)  
**Subject:** Re: [EXT] RE: PTL Sale [IWOV-Active.FID3846845]  
**Attachments:** Application for Vesting Order.pdf

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**Sent:** Wednesday, August 01, 2018 10:42 AM  
**To:** Connors, Gregory  
**Cc:** O'Keefe, Darren (St. John's); Terry King (terry.king@talonenergyservices.ca); Greg Drodge; Spencer, Geoffrey  
**Subject:** RE: [EXT] RE: PTL Sale [IWOV-Active.FID3846845]

Greg:

Here is a copy of the application for the vesting order made.

Regards,

Phil Clarke, CPA, CA, CIRP, LIT  
Partner/ Associe  
BDO Canada LLP/s.r.l./S.E.N.C.R.L.  
Direct/ligne directe: 902-422-1219  
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Fax/Télec.: 902-425-3777  
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<image002.jpg>

**From:** Connors, Gregory <[gregory.connors@mcinnescooper.com](mailto:gregory.connors@mcinnescooper.com)>  
**Sent:** Monday, July 30, 2018 1:19 PM  
**To:** [dokeefe@coxandpalmer.com](mailto:dokeefe@coxandpalmer.com)  
**Cc:** Clarke, Philip <[PClarke@bdo.ca](mailto:PClarke@bdo.ca)>; Terry King ([terry.king@talonenergyservices.ca](mailto:terry.king@talonenergyservices.ca))  
<[terry.king@talonenergyservices.ca](mailto:terry.king@talonenergyservices.ca)>; Greg Drodge <[Greg.Drodge@talonenergyservices.ca](mailto:Greg.Drodge@talonenergyservices.ca)>; Spencer, Geoffrey <[geoffrey.spencer@mcinnescooper.com](mailto:geoffrey.spencer@mcinnescooper.com)>  
**Subject:** [EXT] RE: PTL Sale [IWOV-Active.FID3846845]

Hi Darren,

I spoke with Phil this afternoon who indicated the receiver has filed an application to set a date for the full hearing on the proposed sale of PTL assets. I understood from Phil that the application is *ex parte*. Could you make arrangements to send myself and Geoff Spencer with a copy of the materials filed (we act for the current owners of PTL) and also advise on when we can expect to receive the full suite of materials including the receiver's report (which Phil advises is not yet complete).

Greg

<image003.png>

**Gregory J. Connors**  
Board Director/Partner  
McInnes Cooper  
  
tel +1 (709) 724 8264 | fax +1 (709) 722 1763  
  
5th Floor  
10 Fort William Place  
PO Box 5939 St. John's, NL, A1C 5X4  
  
asst Donna Brown | +1 (709) 724 3626

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THIS IS EXHIBIT "E" TO  
THE AFFIDAVIT OF

Darren O'Keefe

Sworn to before me  
this 3 day of aug, 2018

[Signature]

Barrister & Solicitor NL

## O'Keefe, Darren (St. John's)

---

**From:** Clarke, Philip <PClarke@bdo.ca>  
**Sent:** Thursday, August 02, 2018 2:34 PM  
**To:** O'Keefe, Darren (St. John's)  
**Subject:** FW: [EXT] 81966 Newfoundland Inc. - Bid Result [WOV-Active.FID3846845]

Phil Clarke, CPA, CA, CIRP, LIT  
Partner/ Associe  
BDO Canada LLP/s.r.l./S.E.N.C.R.L.  
Direct/ligne directe: 902-422-1219  
Mobile/ligne mobile: 902-293-9119  
pclarke@bdo.ca

255 Lacewood Drive, Suite 201  
Halifax, NS B3M 4G2  
Canada  
Tel/Tél.: 902-425-3100  
Fax/Télec.: 902-425-3777  
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**From:** Connors, Gregory <gregory.connors@mcinnescooper.com>  
**Sent:** Thursday, July 19, 2018 8:36 AM  
**To:** Clarke, Philip <PClarke@bdo.ca>  
**Cc:** Brown, Donna <donna.brown@mcinnescooper.com>  
**Subject:** Re: [EXT] 81966 Newfoundland Inc. - Bid Result [WOV-Active.FID3846845]

Hi Phil. I've been asked to request the funds for delivery today. I understand the decision to go with the alternative bidder was made 14 days ago. It makes no sense to hold the funds for an additional five days. Our client would like to have the funds today so please confirm you're in a position to send. I look for to hearing from you.

Greg Connors  
McInnes Cooper

On Jul 19, 2018, at 8:12 AM, Clarke, Philip <PClarke@bdo.ca> wrote:

Greg:

I have asked that the wire instructions be prepared. The plan is to send it on Monday. I am in court today and likely not available, but will give you a call tomorrow.

Cheers,

Phil Clarke, CPA, CA, CIRP, LIT  
Partner/ Associe  
BDO Canada LLP/s.r.l./S.E.N.C.R.L.  
Direct/ligne directe: 902-422-1219

Mobile/ligne mobile: 902-293-9119  
[pclarke@bdo.ca](mailto:pclarke@bdo.ca)

255 Lacewood Drive, Suite 201  
Halifax, NS B3M 4G2  
Canada  
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<image001.jpg>

**From:** Connors, Gregory <[gregory.connors@mcinnescooper.com](mailto:gregory.connors@mcinnescooper.com)>  
**Sent:** Wednesday, July 18, 2018 10:26 AM  
**To:** Clarke, Philip <[PClarke@bdo.ca](mailto:PClarke@bdo.ca)>  
**Cc:** Brown, Donna <[donna.brown@mcinnescooper.com](mailto:donna.brown@mcinnescooper.com)>  
**Subject:** RE: [EXT] 81966 Newfoundland Inc. - Bid Result [IWOV-Active.FID3846845]

Phil,

Can you give me a call on the deposit. To my knowledge, we have not received it. Can you please confirm it has been sent?

Greg

**From:** Connors, Gregory  
**Sent:** Monday, July 16, 2018 3:01 PM  
**To:** Clarke, Philip <[PClarke@bdo.ca](mailto:PClarke@bdo.ca)>  
**Cc:** Brown, Donna <[donna.brown@mcinnescooper.com](mailto:donna.brown@mcinnescooper.com)>  
**Subject:** Re: [EXT] FW: 81966 Newfoundland Inc. - Bid Result

Thanks. Anxious to receive. Chat tomorrow morning.

Greg Connors  
McInnes Cooper

On Jul 16, 2018, at 2:09 PM, Clarke, Philip <[PClarke@bdo.ca](mailto:PClarke@bdo.ca)> wrote:

I will follow up with the team and get back to you.

Phil Clarke, CPA, CA, CIRP, LIT  
Partner/ Associe  
BDO Canada LLP/s.r.l./S.E.N.C.R.L.  
Direct/ligne directe: 902-422-1219  
Mobile/ligne mobile: 902-293-9119  
[pclarke@bdo.ca](mailto:pclarke@bdo.ca)

255 Lacewood Drive, Suite 201  
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Canada  
Tel/Tél.: 902-425-3100  
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**From:** Connors, Gregory <[gregory.connors@mcinnescooper.com](mailto:gregory.connors@mcinnescooper.com)>  
**Sent:** Monday, July 16, 2018 9:56 AM  
**To:** Clarke, Philip <[PClarke@bdo.ca](mailto:PClarke@bdo.ca)>  
**Cc:** Brown, Donna <[donna.brown@mcinnescooper.com](mailto:donna.brown@mcinnescooper.com)>  
**Subject:** [EXT] FW: 81966 Newfoundland Inc. - Bid Result

Phil – can you provide an update on when I can expect to receive funds?

**From:** Greg Drodge <[Greg.Drodge@talonenergyservices.ca](mailto:Greg.Drodge@talonenergyservices.ca)>  
**Sent:** Monday, July 16, 2018 10:21 AM  
**To:** Connors, Gregory <[gregory.connors@mcinnescooper.com](mailto:gregory.connors@mcinnescooper.com)>  
**Cc:** Terry King <[Terry.King@talonenergyservices.ca](mailto:Terry.King@talonenergyservices.ca)>; Brown, Donna <[donna.brown@mcinnescooper.com](mailto:donna.brown@mcinnescooper.com)>  
**Subject:** RE: 81966 Newfoundland Inc. - Bid Result

Greg,

Are you able to follow up on this for us please?

Thanks,

GD

**Greg Drodge, P.Eng.**  
Vice President

O | 709.739.8450  
C | 709.687.8310  
[greg.drodge@talonenergyservices.ca](mailto:greg.drodge@talonenergyservices.ca)  
[www.talonenergyservices.ca](http://www.talonenergyservices.ca)

<image008.jpg> <image009.png> <image010.jpg> <image011.jpg>

Interact with Talon via <image012.jpg> <image013.gif>

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**From:** Brown, Donna <[donna.brown@mcinnescooper.com](mailto:donna.brown@mcinnescooper.com)>  
**Sent:** July-16-18 10:20 AM  
**To:** Greg Drodge <[Greg.Drodge@talonenergyservices.ca](mailto:Greg.Drodge@talonenergyservices.ca)>; Connors, Gregory <[gregory.connors@mcinnescooper.com](mailto:gregory.connors@mcinnescooper.com)>  
**Cc:** Terry King <[Terry.King@talonenergyservices.ca](mailto:Terry.King@talonenergyservices.ca)>  
**Subject:** RE: 81966 Newfoundland Inc. - Bid Result

No funds yet, from BDO.

Donna

**From:** Greg Drodge <[Greg.Drodge@talonenergyservices.ca](mailto:Greg.Drodge@talonenergyservices.ca)>  
**Sent:** Monday, July 16, 2018 10:11 AM  
**To:** Connors, Gregory <[gregory.connors@mcinnescooper.com](mailto:gregory.connors@mcinnescooper.com)>; Brown, Donna <[donna.brown@mcinnescooper.com](mailto:donna.brown@mcinnescooper.com)>  
**Cc:** Terry King <[Terry.King@talonenergyservices.ca](mailto:Terry.King@talonenergyservices.ca)>  
**Subject:** RE: 81966 Newfoundland Inc. - Bid Result

Greg/Donna,

Have the funds from BDO been returned to your account yet?

Please advise as we are anxious to get the deposit back...

Thanks,

Greg

**Greg Drodge, P.Eng.**  
Vice President

O | 709.739.8450  
C | 709.687.8310  
[greg.drodge@talonenergyservices.ca](mailto:greg.drodge@talonenergyservices.ca)  
[www.talonenergyservices.ca](http://www.talonenergyservices.ca)

<image008.jpg> <image009.png> <image010.jpg> <image011.jpg>  
Interact with Talon via <image012.jpg> <image013.gif>

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**From:** Connors, Gregory <[gregory.connors@mcinnescooper.com](mailto:gregory.connors@mcinnescooper.com)>  
**Sent:** July-11-18 3:40 PM  
**To:** Clarke, Philip <[PClarke@bdo.ca](mailto:PClarke@bdo.ca)>; Brown, Donna <[donna.brown@mcinnescooper.com](mailto:donna.brown@mcinnescooper.com)>  
**Cc:** Terry King <[Terry.King@talonenergyservices.ca](mailto:Terry.King@talonenergyservices.ca)>; Greg Drodge <[Greg.Drodge@talonenergyservices.ca](mailto:Greg.Drodge@talonenergyservices.ca)>; Consoli, Angelo <[aconsoli@bdo.ca](mailto:aconsoli@bdo.ca)>  
**Subject:** Re: 81966 Newfoundland Inc. - Bid Result

Donna, could you please provide Phil with our BMO trust account information. He is returning some deposit funds.

Greg Connors  
McInnes Cooper

On Jul 11, 2018, at 3:11 PM, Clarke, Philip <[PClarke@bdo.ca](mailto:PClarke@bdo.ca)> wrote:

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

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Sirs: Please see attached letter. Cheers.

Phil Clarke, CPA, CA, CIRP, LIT  
Partner/ Associe

BDO Canada LLP/s.r.l./S.E.N.C.R.L.  
Direct/ligne directe: 902-422-1219  
Mobile/ligne mobile: 902-293-9119  
[pclarke@bdo.ca](mailto:pclarke@bdo.ca)

255 Lacewood Drive, Suite 201  
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**<81966 Newfoundland Inc. Bid Response.pdf>**

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THIS IS EXHIBIT "f" TO  
THE AFFIDAVIT OF

Darren O'Keefe

Sworn to before me  
this 3 day of aug, 2018

[Signature]

Barrister & Solicitor NL

## Philpott, Allison (St. John's)

---

**From:** Connors, Gregory <gregory.connors@mcinnescooper.com>  
**Sent:** Thursday, August 02, 2018 2:00 PM  
**To:** O'Keefe, Darren (St. John's)  
**Cc:** Spencer, Geoffrey; Philpott, Allison (St. John's); Phil Clarke (PClarke@bdo.ca)  
**Subject:** RE: PTL Group (In Receivership) - 81966 Newfoundland & Labrador Inc. [IWOV-Active.FID3846845]

Darren,

We have no instructions at this time to accept service for 81966 Newfoundland & Labrador Inc.

**From:** O'Keefe, Darren (St. John's) <dokeefe@coxandpalmer.com>  
**Sent:** Wednesday, August 1, 2018 4:35 PM  
**To:** Connors, Gregory <gregory.connors@mcinnescooper.com>  
**Cc:** Spencer, Geoffrey <geoffrey.spencer@mcinnescooper.com>; Philpott, Allison (St. John's) <aphilpott@coxandpalmer.com>; Phil Clarke (PClarke@bdo.ca) <PClarke@bdo.ca>  
**Subject:** RE: PTL Group (In Receivership) - 81966 Newfoundland & Labrador Inc.

Greg:

Can you confirm that you represent **81966 Newfoundland & Labrador Inc.** so that we may send you the package or the hearing on Tuesday, on their behalf. We note the package has already been delivered to you in your capacity as counsel for the "current owners", which we understand includes one or more of the persons involved in 81966 Newfoundland & Labrador Inc.

Thanks,  
Darren

**Darren O'Keefe** | Cox & Palmer | Partner  
**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)  
**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

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---

**From:** O'Keefe, Darren (St. John's)  
**Sent:** Wednesday, August 01, 2018 1:06 AM  
**To:** 'Connors, Gregory'  
**Cc:** Spencer, Geoffrey; 'Philpott, Allison (St. John's)'  
**Subject:** RE: PTL Group (In Receivership)

Greg,

Please find the following documents attached:

1. Application of the Receiver for a Vesting Order, which was set down today for a hearing at 10:00 a.m. on August 6<sup>th</sup>;
2. 1<sup>st</sup> Report of the Receiver (with attachments in zip folders); and

Please let me know if you have any questions.

Regards,  
Darren

**Darren O'Keefe** | Cox & Palmer | Partner  
**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)  
**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

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---

**From:** Connors, Gregory [<mailto:gregory.connors@mcinnescooper.com>]  
**Sent:** Monday, July 30, 2018 6:11 PM  
**To:** Clarke, Philip  
**Cc:** O'Keefe, Darren (St. John's); Terry King ([terry.king@talonenergyservices.ca](mailto:terry.king@talonenergyservices.ca)); Greg Drodge; Spencer, Geoffrey  
**Subject:** Re: [EXT] RE: PTL Sale [IWOV-Active.FID3846845]

Phil, I believe you were going to look into getting me a copy of the application which is been filed for hearing tomorrow. I have not heard back from Daren since my email this morning. Can you please advise.

Greg Connors  
McInnes Cooper

On Jul 30, 2018, at 5:05 PM, Clarke, Philip <[PClarke@bdo.ca](mailto:PClarke@bdo.ca)> wrote:

Greg:

The application is not ex parte, can't be. Correct. The Receiver's report is not yet complete. I am hoping to have it done for Wednesday.

Cheers!

**Phil Clarke, CPA, CA, CIRP, LIT**  
Partner/ Associe  
BDO Canada LLP/s.r.l./S.E.N.C.R.L.  
Direct/ligne directe: 902-422-1219  
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[pclarke@bdo.ca](mailto:pclarke@bdo.ca)

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Fax/Télé.: 902-425-3777  
[www.bdo.ca](http://www.bdo.ca)

THIS IS EXHIBIT "G" TO  
THE AFFIDAVIT OF

Darren O'Keefe

Sworn to before me  
this 3 day of Aug, 2018

[Signature]

Barrister & Solicitor NL

2018 01G 3114  
SUPREME COURT OF NEWFOUNDLAND AND LABRADOR  
IN BANKRUPTCY AND INSOLVENCY

IN THE MATTER OF the *Bankruptcy and  
Insolvency Act*, RSC 1985, c B-3, as amended

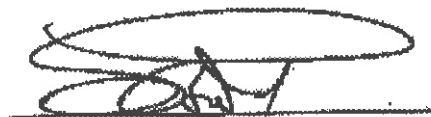
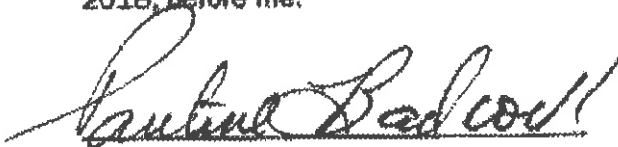
AND IN THE MATTER OF the  
Receivership of PTL Holdings Limited,  
PTL Services (Equipment) Limited,  
CSL Services (Industrial) Limited and  
9263357 Canada Inc.

AFFIDAVIT OF SERVICE

I, Guy Badcock of Paradise, Newfoundland and Labrador, make oath and say as follows:

1. On August 2nd, 2018 at 2:45 a.m./p.m. I served Lisa Warren, Manager of Collection, Tax Account and Services, Government of Newfoundland and Labrador, by leaving the Application of the Receiver and the Receivers Report with her at 3<sup>rd</sup> Floor, East Block, Confederation Building, St. John's, Newfoundland and Labrador.
2. I was able to identify the person by means of Sheila Lundy

SWORN TO at St. John's, Newfoundland and  
Labrador this 3rd day of August  
2018, before me:

  
Guy Badcock

**PAULINE BADCOCK**  
A Commissioner for Oaths in and for  
the Province of Newfoundland and Labrador.  
My commission expires on December 31, 2018.

2018 01G 3114  
SUPREME COURT OF NEWFOUNDLAND AND LABRADOR  
IN BANKRUPTCY AND INSOLVENCY

IN THE MATTER OF the *Bankruptcy and  
Insolvency Act*, RSC 1985, c B-3, as amended

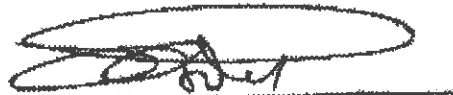
AND IN THE MATTER OF the  
Receivership of PTL Holdings Limited,  
PTL Services (Equipment) Limited,  
CSL Services (Industrial) Limited and  
9263357 Canada Inc.

AFFIDAVIT OF SERVICE

I, Guy Badcock of Paradise, Newfoundland and Labrador, make oath and say as follows:

1. On August 2<sup>nd</sup>, 2018 at 2:30 a.m./p.m. I served Anne Martin at WorkplaceNL, by leaving the Application of the Receiver and the Receivers Report with her at 146-148 Forest Road, St. John's, Newfoundland and Labrador.
2. I was able to identify the person by means of Known personally

SWORN TO at St. John's, Newfoundland and  
Labrador this 2<sup>nd</sup> day of August  
2018, before me:



Guy Badcock

PAULINE BADCOCK  
A Commissioner for Oaths in and for  
the Province of Newfoundland and Labrador.  
My commission expires on December 31, 2018.

THIS IS EXHIBIT "H" TO  
THE AFFIDAVIT OF

Darren O'Keefe

Sworn to before me  
this 3 day of Aug, 2018

[Signature]

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## Companies and Deeds Online - CADO

### Detailed Company Information

**Company Name:** PTL Holdings Limited

In Good Standing

<b>Company Number:</b>	73745	<b>Corporation Type:</b>	Company
<b>Status:</b>	Active	<b>Category:</b>	Local
<b>Last Annual Return:</b>	2017-10-31	<b>Business Type:</b>	With Share Capital
<b>Incorporation Jurisdiction:</b>	NL	<b>Filing Type:</b>	Incorporation With Share Capital
<b>Incorporation Date:</b>	2014-11-19	<b>Min/Max Directors:</b>	1 / 10

**Additional Information:**

*(Latest addresses on file)*

**Registered Office:**  
215 Water Street  
Suite 301, Box 11  
St. John's  
NL Canada  
A1C 6C9

**Mailing Address:**  
Same as Registered Office

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### Current Directors

Records Found: 5

Viewing Records: 1-5

Director Name

Greg Drodge

Robyn King

Terry King

Keith Way

Barry Whelan

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## Companies and Deeds Online - CADO

### Detailed Company Information

**Company Name:** PTL Services (Equipment) Ltd.

In Good Standing

<b>Company Number:</b>	7175	<b>Corporation Type:</b>	Company
<b>Status:</b>	Active	<b>Category:</b>	Local
<b>Last Annual Return:</b>	2017-12-31	<b>Business Type:</b>	With Share Capital
<b>Incorporation Jurisdiction:</b>	NL	<b>Filing Type:</b>	Incorporation With Share Capital
<b>Incorporation Date:</b>	1974-01-11	<b>Min/Max Directors:</b>	1 / 6

**Additional Information:**

*(Latest addresses on file)*

**Registered Office:**  
1 Main Street  
Southern Bay  
NL Canada

**Mailing Address:**  
P.O. Box 40  
Southern Harbour  
NL Canada  
A0B 3H0

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### Previous Names

Name	Date Changed
Parsons Trucking Limited	2015-01-22

### Current Directors

Records Found: 5

Viewing Records: 1-5

**Director Name**  
Greg Drodge  
Robyn King  
Terry King  
Keith Way  
Bary Whelan

### Historical Remarks

CERTIFICATE OF AMENDMENT

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## Companies and Deeds Online - CADO

### Detailed Company Information

**Company Name:** CSL SERVICES (INDUSTRIAL) LIMITED

Not in Good Standing

**Company Number:** 74866  
**Status:** Active  
**Last Annual Return:** 2017-04-30  
**Incorporation Jurisdiction:** CBCA  
**Registration Date:** 2015-05-07  
**Incorporation Date:** 2002-04-24

**Corporation Type:** Company  
**Category:** Extra-Provincial  
**Business Type:** With Share Capital - Dominion  
**Filing Type:** Registration

#### Additional Information:

*(Latest addresses on file)*

**Registered Office in NL:**  
PO Box 40  
Southern Harbour  
NL Canada  
A0B 3H0

**Registered Office outside NL:**  
215 Water Street  
Suite 301, Box 11  
St. John's  
NL Canada  
A1C 6C9

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## Federal Corporation Information - 926335-7

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### **i** Note

This information is available to the public in accordance with legislation (see [Public disclosure of corporate information](#)).

#### **Corporation Number**

926335-7

#### **Business Number (BN)**

839169745RC0001

#### **Corporate Name**

9263357 Canada Inc.

#### **Status**

Active

#### **Governing Legislation**

*Canada Business Corporations Act - 2015-04-21*

## Registered Office Address

Care of: Terry King  
215 Water Street, Suite 301  
Box 11  
St. John's NL A1C 6C9  
Canada

### **i** Note

Active CBCA corporations are required to [update this information](#) within 15 days of any change. A [corporation key](#) is required. If you are not authorized to update this information, you can either contact the corporation or contact [Corporations Canada](#). We will inform the corporation of its [reporting obligations](#).

## Directors

Minimum 1

Maximum 10

Greg Drodge

10 Heather Place

St. John's NL A1A

4R7  
Canada

Keith Way  
215 Water Street,  
Suite 301  
St. John's NL A1C  
6C9  
Canada

Barry Whelan  
215 Water Street,  
Suite 301  
St. John's NL A1C  
6C9  
Canada

Robyn King  
378 Three Island  
Pond Road  
Paradise NL A1L  
2G1  
Canada

Terry King  
378 Three Island  
Pond Road  
Paradise NL A1L  
2G1  
Canada

### **Note**

Active CBCA corporations are required to update director information (names, addresses, etc.) within 15 days of any change. A corporation key is required. If you are not authorized to update this information, you can either contact the corporation or contact Corporations Canada. We will inform the corporation of its reporting obligations.

## **Annual Filings**

### **Anniversary Date (MM-DD)**

04-21

### **Date of Last Annual Meeting**

2017-01-02

### **Annual Filing Period (MM-DD)**

04-21 to 06-20

### **Type of Corporation**

Non-distributing corporation with 50 or fewer shareholders

### **Status of Annual Filings**

2018 - Overdue

2017 - Filed

2016 - Filed

## **Corporate History**

### **Corporate Name History**

2015-04-21 to Present

9263357 Canada Inc.

## **Certificates and Filings**

### **Certificate of Continuance**

2015-04-21

Previous jurisdiction: Newfoundland and Labrador

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**Date Modified:**

2018-06-19

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## Companies and Deeds Online - CADO

Detailed Company Information			
<b>Company Name:</b>	81966 NEWFOUNDLAND AND LABRADOR INC.		
In Good Standing			
<b>Company Number:</b>	81966	<b>Corporation Type:</b>	Company
<b>Status:</b>	Active	<b>Category:</b>	Local
<b>Last Annual Return:</b>		<b>Business Type:</b>	With Share Capital
<b>Incorporation Jurisdiction:</b>	NL	<b>Filing Type:</b>	Incorporation With Share Capital
<b>Incorporation Date:</b>	2018-06-13	<b>Min/Max Directors:</b>	1 / 10
<b>Additional Information:</b>			
<i>(Latest addresses on file)</i>			
<b>Registered Office:</b> 156 Glenco Drive Mt. Pearl NL, Canada A1N 4S9		<b>Mailing Address:</b> Same as Registered Office	

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Current Directors	
Records Found: 2	Viewing Records: 1-2
<b>Director Name</b>	
Greg Drodge	
Terry King	

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THIS IS EXHIBIT "I" TO  
THE AFFIDAVIT OF

Darren O'Keefe

Sworn to before me  
this 3 day of aug, 20 18

C. J. [Signature]

Notary Public & Solicitor NL



## Philpott, Allison (St. John's)

---

**From:** Clarke, Philip <PClarke@bdo.ca>  
**Sent:** Friday, August 03, 2018 9:04 AM  
**To:** Sarin, Supriya; O'Keefe, Darren (St. John's); cholm@wickwireholm.com  
**Cc:** Philpott, Allison (St. John's); Consoli, Angelo; Ravani, Pathik; Echeverri, Mauricio  
**Subject:** RE: [EXT] RE: PTL Group (In Receivership)

Received with thanks!

Phil Clarke, CPA, CA, CIRP, LIT  
Partner/ Associe  
BDO Canada LLP/s.r.l./S.E.N.C.R.L.  
Direct/ligne directe: 902-422-1219  
Mobile/ligne mobile: 902-293-9119  
pclarke@bdo.ca

255 Lacewood Drive, Suite 201  
Halifax, NS B3M 4G2  
Canada  
Tel/Tél.: 902-425-3100  
Fax/Téléc.: 902-425-3777  
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**From:** Sarin, Supriya <Supriya.Sarin@cibc.com>  
**Sent:** Thursday, August 02, 2018 5:32 PM  
**To:** O'Keefe, Darren (St. John's) <dokeefe@coxandpalmer.com>; cholm@wickwireholm.com  
**Cc:** Clarke, Philip <PClarke@bdo.ca>; Philpott, Allison (St. John's) <aphilpott@coxandpalmer.com>; Consoli, Angelo <aconsoli@bdo.ca>; Ravani, Pathik <Pathik.Ravani@cibc.com>; Echeverri, Mauricio <Mauricio.Echeverri@cibc.com>  
**Subject:** [EXT] RE: PTL Group (In Receivership)

Hi Darren,

Thank you for the 1<sup>st</sup> report of the Receiver and the Sale Approval materials. CIBC has reviewed and supports the Receiver's application.

Regards,

**Supriya Sarin** | Senior Director, CIBC, Special Loans, Head Office | **Risk Management** | 25 King Street West, 16th Floor, Toronto, ON M5L 2A1 | Telephone: 416.304.8609 Fax: 416.214.8749 | [supriya.sarin@cibc.com](mailto:supriya.sarin@cibc.com)



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**From:** O'Keefe, Darren (St. John's) [<mailto:dokeefe@coxandpalmer.com>]  
**Sent:** Wednesday, August 01, 2018 3:15 PM  
**To:** Sarin, Supriya; [chohm@wickwireholm.com](mailto:chohm@wickwireholm.com)  
**Cc:** Phil Clarke ([PClarke@bdo.ca](mailto:PClarke@bdo.ca)); Philpott, Allison (St. John's)  
**Subject:** Re: PTL Group (In Receivership)

Good afternoon, Ms. Sarin and Mr. Holm:

We write as independent counsel to BDO Canada Ltd., in its capacity as Receiver of PTL Holdings Ltd., PTL Services (Equipment) Limited, CSL Services (Industrial) Limited, and 9263357 Canada Inc. (collectively, the "PTL Group"). BDO have directed us to send this email CIBC and counsel, as the senior secured creditor of the PTL Group who may have an interest in these proceedings.

Please find the following documents attached hereto:

1. Application of the Receiver for a Vesting Order, approving the sale of substantially all of the assets of the PTL Group as a going concern, which is set for a hearing at the Supreme Court of Newfoundland and Labrador, Duckworth Street, St. John's, at **10:00 a.m. on August 6<sup>th</sup>**; and
2. The 1<sup>st</sup> Report of the Receiver (with attachments in zip folders).

We trust you will find the attached to be in order. If you have any questions please let me know.

Regards,  
Darren

**Darren O'Keefe** | Cox & Palmer | Partner  
**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)  
**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

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THE AFFIDAVIT OF

Damen O'Keefe

Sworn to before me  
this 3 day of aug, 20 18

Cliff

Baristes ← Solicitor NC

## Philpott, Allison (St. John's)

---

**From:** Boyd, William <william.boyd@mcinnescooper.com>  
**Sent:** Friday, August 03, 2018 8:42 AM  
**To:** O'Keefe, Darren (St. John's)  
**Cc:** Philpott, Allison (St. John's); Phil Clarke (PClarke@bdo.ca)  
**Subject:** RE: PTL Group (In Receivership) [IWOV-Active.FID3847404]

Good morning Darren,

I have spoken with Kevin Parsons this AM on behalf of the Parsons family and he has instructed me to advise you that the Parsons family are not opposing the application and will not be appearing at the hearing currently scheduled for Monday, August 6<sup>th</sup>.

Bill

**From:** O'Keefe, Darren (St. John's) <dokeefe@coxandpalmer.com>  
**Sent:** Wednesday, August 1, 2018 5:23 PM  
**To:** Boyd, William <william.boyd@mcinnescooper.com>  
**Cc:** Philpott, Allison (St. John's) <aphilpott@coxandpalmer.com>; Phil Clarke (PClarke@bdo.ca) <PClarke@bdo.ca>  
**Subject:** Re: PTL Group (In Receivership)

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Mr. Boyd:

We write as independent counsel to BDO Canada Ltd., in its capacity as Receiver of PTL Holdings Ltd., PTL Services (Equipment) Limited, CSL Services (Industrial) Limited, and 9263357 Canada Inc. (collectively, the "PTL Group"). BDO have directed us to send this email to you, as counsel for the Parsons Vendors (VTB Holders), as referenced in the application for Receivership granted May 11<sup>th</sup>, 2018, on which we understand you were counsel of record.

Please find the following documents attached hereto:

1. Application of the Receiver for a Vesting Order, approving the sale of substantially all of the assets of the PTL Group as a going concern, which is set for a hearing at the Supreme Court of Newfoundland and Labrador, Duckworth Street, St. John's, at **10:00 a.m. on August 6<sup>th</sup>**; and
2. The 1<sup>st</sup> Report of the Receiver (with attachments in zip folders).

We trust you will find the attached to be in order.

Regards,  
Darren

**Darren O'Keefe** | Cox & Palmer | Partner  
**Direct** 709 570 5509 **Fax** 709 738 7999 **Web** [coxandpalmerlaw.com](http://coxandpalmerlaw.com)  
**Address** Suite 1100 Scotia Centre 235 Water Street St. John's NL A1C 1B6

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