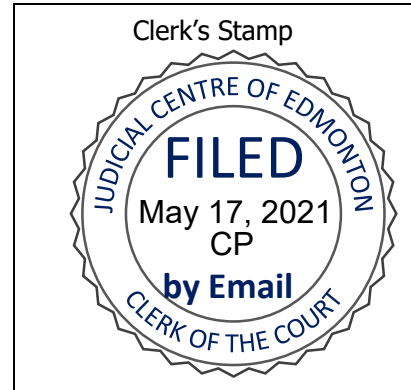


COURT FILE NO. 2103 02132
COURT COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE EDMONTON



PLAINTIFF BUSINESS DEVELOPMENT BANK OF CANADA
DEFENDANT P7 CONSTRUCTION LTD., 1619904 ALBERTA LTD.,
HYOUNG JOON YOON aka JASON YOON,
SUNG SOO CHOI aka RICHARD CHOI and EUNG CHANG KIM

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DOCUMENT **APPLICATION FOR APPOINTMENT OF RECEIVER AND MANAGER
OVER P7 CONSTRUCTION LTD. AND 1619904 ALBERTA LTD.**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	McLENNAN ROSS LLP #600 McLennan Ross Building 12220 Stony Plain Road Edmonton, AB T5N 3Y4	Lawyer: Charles P. Russell, Q.C. Telephone: (780) 482-9115 Fax: (780) 733-9757 Email: crussell@mross.com File No.: 20201461
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NOTICE TO THE SERVICE LIST:

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:	May 21, 2021
Time:	2:00 p.m.
Where:	Law Courts, 1A Sir Winston Churchill Square, Edmonton
Before Whom:	Justice Grant S. Dunlop

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 BDO Canada Limited as receiver and manager of P7 Construction Ltd., substantially in the form attached hereto and marked as Schedule "A".
3. An order appointing BDO Canada Limited as receiver and manager of 1619904 Alberta Ltd., substantially in the form attached hereto and marked as Schedule "B".
4. Such further and other relief as counsel may advise and as this Honourable Court may deem fit.

Grounds for making this application:

5. The Plaintiff is first secured creditor of P7 Construction Ltd., holding a General Security Agreement and a Real Property Mortgage, amongst other security.
6. The Plaintiff is first secured creditor of 1619904 Alberta Ltd., holding a General Security Agreement, amongst other security.
7. P7 Construction Ltd. and 1619904 Alberta Ltd. are in default of performance of obligations owed to the Plaintiff as referenced in the Affidavit of Monika Sahdev, filed.
8. Demand for payment has been made by the Plaintiff, which demand has gone unanswered.
9. BDO Canada Limited has consented to act as receiver and manager of the assets of P7 Construction Ltd. and 1619904 Alberta Ltd.
10. Such further and other grounds as counsel may advise.

Material or evidence to be relied on:

11. Affidavit of Monika Sahdev, to be filed.
12. Such further and other evidence as counsel may advise.

Applicable legislation and rules:

13. Section 243 of the *Bankruptcy and Insolvency Act*, RSC 1985, c. B-3 as amended.
14. Section 13(2) of the *Judicature Act*, RSA 2000, c. J-2 as amended.
15. Section 99(a) of the *Business Corporations Act*, RSA 2000, c. B-9, as amended.
16. Section 55(7) of the *Personal Property Security Act*, RSA 2000, c. P-7, as amended.
17. Alberta Rules of Court Rules 1.3, 1.4, 3.68, 3.73.
18. 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:

19. None.

How the application is proposed to be heard or considered:

20. 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.