



Bennett Jones

Bennett Jones LLP

4500 Bankers Hall East, 855 - 2nd Street SW

Calgary, Alberta, Canada T2P 4K7

Tel: 403.298.3100 Fax: 403.265.7219

**Kelsey Meyer, K.C.**

**Partner**

Direct Line: 403.298.3323

e-mail: meyerk@bennettjones.com

Our File No.: 069190.243

August 31, 2026

**Via email: [Caroline.Grigorovich@albertacourts.ca](mailto:Caroline.Grigorovich@albertacourts.ca)**

Justice J. T. Neilson  
Court of King's Bench  
Edmonton Law Courts  
1A Sir Winston Churchill Square  
Edmonton, AB T5J 0R2

Dear Justice J. T. Neilson:

**Re: Court File No. 2601-15777: Dino DeLuca in his capacity as Holder Representative on behalf of Team Canada SSM LLC, Triwest Lower Mid-Fund I, L.P., formerly known as Triwest Private Capital Growth Fund, L.P., Douglas G. Nyhoff, James R. Lites & Charla Kim Smith, Jointly, and Joseph M. DePinto v. A Parent Media Co. Inc. and Kidoodle, Inc.  
Commercial List Application scheduled on Thursday, September 3, 2026 at 3:30 p.m.**

We are legal counsel to Dino DeLuca, in his capacity as Holder Representative on behalf of Team Canada SSM LLC, Triwest Lower Mid-Fund I, L.P., formerly known as Triwest Private Capital Growth Fund, L.P., Douglas G. Nyhoff, James R. Lites & Charla Kim Smith, Jointly, and Joseph M. DePinto (the "**Applicant**"), with respect to his application scheduled before you on the Edmonton Commercial List on Thursday, September 3<sup>rd</sup>, 2026 at 3:30 p.m. MT via Webex for a receivership order. Please find enclosed the following materials:

1. Originating Application with proposed form of Receivership Order attached thereto (as well as a redline comparison to a form of Consent Receivership Order consented to by A Parent Media Co. Inc. and by Kidoodle, Inc., as is explained in the Originating Application);
2. Affidavit of Dino DeLuca sworn August 29, 2026;
3. Consent to Act of AlixPartners Restructuring, Inc.;
4. Blackline of the form of proposed Consent Receivership Order to the Alberta Court's Template Receivership Order.

August 31, 2026

Page 2

Proof of filing of the Consent to Act will be provided upon receipt.

Yours truly,

**BENNETT JONES LLP**

*Kelsey Meyer*

Kelsey Meyer, K.C.

KM:jw  
Encls.

cc: James McClary, Michael Selnes, James Allan, Bennett Jones LLP  
Service List