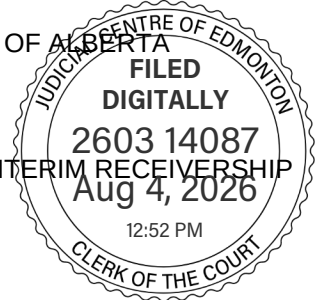


Clerk's stamp:

COURT FILE NUMBER	2603 14087
COURT	COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE	EDMONTON
	IN THE MATTER OF THE INTERIM RECEIVERSHIP OF ANS 1993 LTD. et al.
PLAINTIFF	ROYAL BANK OF CANADA
DEFENDANTS	ANS 1993 LTD., 1416452 ALBERTA LTD., 2242246 ALBERTA LTD., 2308213 ALBERTA LTD., 786 N AND S ENTERPRISES LTD., P & N DEVELOPMENT LTD. and RAZIA QARNI
DOCUMENT	<u>APPLICATION BY ALIXPARTNERS RESTRUCTURING, INC. AS COURT-APPOINTED INTERIM RECEIVER FOR APPROVAL OF INTERIM RECEIVER'S FEES AND ACTIVITIES</u>
ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	DENTONS CANADA LLP Bankers Court 15th Floor, 850 - 2nd Street S.W. Calgary, Alberta T2P 0R8 Attention: Afshan Naveed, KC Ph. (403) 268-7015 Fx. (403) 268-3100 File No.: 704083-1



NOTICE TO RESPONDENTS: Service List attached as **Schedule "A"**

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

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

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

Date	August 12, 2026
Time	2:00 p.m.
Where	Edmonton Law Courts VIA WEB-EX using the following link: https://albertacourts.webex.com/meet/virtual.courtroom86
Before Whom	The Honourable Justice M.E. Burns

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. AlixPartners Restructuring, Inc. ("**AlixPartners**") is the court-appointed interim receiver (the "**Interim Receiver**") of all of the current and future assets, undertakings and properties of every nature and kind whatsoever, and wherever situate, including all proceeds thereof (the "**Property**") of ANS 1993 Ltd., 1416452 Alberta Ltd., 2242246 Alberta Ltd., 2308213 Alberta Ltd., 786 N and S Enterprises Ltd. and P & N Development Ltd. (collectively, the "**Debtors**") pursuant to the interim receivership order of the Court of King's Bench (the "**Court**") granted by the Honourable Justice M.J. Lema on July 2, 2026 (the "**Interim Receivership Order**").
2. Capitalized terms not otherwise defined herein shall have the meaning given to them in the First Report of the Interim Receiver dated August 4, 2026 (the "**First Report**"), as the context requires.
3. In this Application, the Interim Receiver seeks from this Honourable Court:
 - (a) an order, substantially in the form attached as **Schedule "B"** hereto:
 - (i) abridging the time for service of this application and deeming service good and sufficient and declaring that no other person is required to have been served with notice of this Application, if necessary;
 - (ii) approving and ratifying the actions, conduct, and activities of the Interim Receiver, as set out in the First Report;
 - (iii) approving the professional fees and disbursements of the Interim Receiver, and those of its legal counsel, Dentons Canada LLP ("**Dentons**"), as set out in the First Report; and
 - (b) granting such further and other relief, advice, and directions as counsel may advise and this Honourable Court deems just and appropriate.

Grounds for making this application:

Interim Receivership Proceedings

4. On July 2, 2026, Royal Bank of Canada ("**RBC**") applied for and obtained an interim receivership order appointing AlixPartners as the Interim Receiver pursuant to section 47 of the *Bankruptcy and Insolvency Act*, RSC 1985, c B-3 (the "**BIA**") and section 13(2) of the *Judicature Act*, RSA 2000, c J-2. The Interim Receivership Order provides that the interim receivership shall terminate at the earliest of (a) the taking possession by a receiver, within the meaning of subsection 243(2) of the BIA of the Property; and (b) September 30, 2026, unless renewed by further order of this Court prior to this date. RBC has now brought an application for the appointment of a receiver over the Property of the Debtors, which, if obtained, will terminate the interim receivership.
5. The Interim Receiver's First Report sets out the activities of the Interim Receiver since July 2, 2026 (the "**Appointment Date**") and sets out the Interim Receiver's manner of dealing with the interim receivership, including any pre-appointment work that was required. The Interim Receiver seeks the approval of the Court for the activities set out in the Interim Receiver's First Report.
6. The Debtors are related companies in the business of operating childcare facilities in Edmonton, Alberta, as further described in the First Report.

7. The Interim Receiver, among other things, and as more expressly detailed in the First Report, completed the following activities since its appointment:
 - (a) formulated the Cash Management Process;
 - (b) took possession of the Debtors' bank accounts;
 - (c) engaged with Trusted Accounting and other daycare turnaround consultants to understand where they could assist during the interim receivership;
 - (d) prepared a draft 13-week cash flow forecast;
 - (e) prepared preliminary net realizable value analysis for the Facilities;
 - (f) corresponded extensively with the Debtors' stakeholders regarding the interim receivership, namely the Government of Alberta, Alberta Employment Standards, the employees of the Child Care Facilities, the CRA, the Child Care Facilities' landlords and utility providers;
 - (g) met with Ms. Qarni to discuss the proceedings and critical requirements for the Interim Receiver to effectively support the operations;
 - (h) reviewed all disbursements identified by Ms. Qarni through the Funding Request Model and remitted payment for services duly incurred since the appointment of the Interim Receiver;
 - (i) engaged with potential purchasers for the Business and facilitated due diligence process requests on the same; and
 - (j) prepared the Interim Receiver's First Report.
8. The Interim Receiver seeks ratification and approval of its actions, conduct and activities, as detailed in the First Report.
9. Additionally, the Interim Receiver seeks ratification and approval of the Interim Receiver's professional fees and disbursements, and those of its counsel, Dentons, as set out in the First Report. A summary of the professional fees and disbursements is set out in the First Report and the Fee Affidavit of Jason Knight, sworn August 4, 2026.
10. The Interim Receiver incurred professional fees and disbursements for the period of June 8, 2026 to July 31, 2026 in the amount of \$161,989.07. The Interim Receiver's counsel, Dentons, has incurred fees in the amount of \$33,872.78 for the period of June 22, 2026 to July 31, 2026 that are unpaid.
11. In addition, the Interim Receiver seeks approval of the Estimated Remaining Fees, to be incurred during the period between August 1, 2026 and August 12, 2026.
12. The Interim Receiver submits that its fees and disbursements, and the fees and disbursements of its counsel, Dentons, are fair and reasonable and justified in the circumstances. The Interim Receiver recommends approval of its accounts and the accounts of Dentons by this Court.
13. Such further and other grounds as counsel may advise and this Honourable Court may permit.

Material or evidence to be relied on:

14. First Report of the Interim Receiver dated August 4, 2026, filed.
15. Fee Affidavit of Jason Knight, sworn August 4, 2026, filed.
16. The pleadings and proceedings in the within action.
17. Such further and other material and evidence as counsel may advise and this Honourable Court may permit.

Applicable Rules:

18. *Alberta Rules of Court*, Alta Reg 124/2010, including but not limited to rules 1.2-1.5, 6.3(1), 6.9(1)(b), 6.10, 6.47(e) and (f), and 11.27.
19. Such further and other Rules as counsel may advise and this Honourable Court may permit.

Applicable Acts and regulations:

20. *Bankruptcy and Insolvency Act*, RSC 1985 c B-3, as amended.
21. *Bankruptcy and Insolvency General Rules*, CRC c 368.
22. *Judicature Act*, RSA 2000 c J-2.
23. Such further and other Acts and regulations as counsel may advise and this Honourable Court may permit.

Any irregularity complained of or objection relied on:

24. None.

How the application is proposed to be heard or considered:

25. Via Web-Ex, before the Presiding Commercial List Justice.

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 at the 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.

Schedule "A" – Service List

COURT FILE NUMBER: 2603 14087

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE: EDMONTON

PLAINTIFF ROYAL BANK OF CANADA

DEFENDANTS ANS 1993 LTD., 1416452 ALBERTA LTD.,
2242246 ALBERTA LTD., 2308213 ALBERTA LTD.,
786 N AND S ENTERPRISES LTD.,
P & N DEVELOPMENT LTD., and RAZIA QARNI

SERVICE LIST

Updated: August 4, 2026

PARTY	DELIVERY METHOD	STATUS
MLT Aikins LLP 2100 Livingstone Place 222 - 3 rd Avenue SW Calgary, Alberta T2P 0B4 Attention: Catrina Webster Jaye Sutherland	Email: cwebster@mltaikins.com jsutherland@mltaikins.com	<i>Counsel to Royal Bank of Canada</i>
Dentons Canada LLP 15 th Floor, Bankers Court 850 – 2 nd Street SW Calgary, Alberta T2P 0R8 Attention: Afshan Naveed, KC Derek Pontin	Email: afshan.naveed@dentons.com derek.pontin@dentons.com	<i>Counsel to the Interim Receiver</i>
Alix Partners Restructuring Inc. 1165, 324 8 th Avenue SW Calgary, Alberta T2P 2Z2 Attention: Jason Knight Ross Graham Paul Lim	Email: jknight@ksvadvisory.com rgraham@ksvadvisory.com plim@ksvadvisory.com	<i>Interim Receiver</i>

Razia Qarni 979 175 Street S.W. Edmonton, Alberta T6W 178 <i>ANS 1993 Ltd., 1416452 Alberta Ltd., 2242246 Alberta Ltd., 2308213 Alberta Ltd., 786 N and S Enterprises Ltd., P & N Development Ltd., 2595568 Alberta Ltd., and 2595574 Alberta Ltd.,</i>	Email: razia.qarni@hotmail.com	<i>Defendant and principal of ANS 1993 Ltd., 1416452 Alberta Ltd., 2242246 Alberta Ltd., 2308213 Alberta Ltd., 786 N and S Enterprises Ltd., P & N Development Ltd., 2595568 Alberta Ltd., and 2595574 Alberta Ltd.,</i>
Rupinder Kaur, Jaspreet Kaur, and Kulvinder Sidhu 333 - 52147 RR 231 Sherwood Park, Alberta T8B 1A4	Courier and Email: ranisidhu1@hotmail.com	<i>Secured Creditor of ANS 1993 Ltd., 2242246 Alberta Ltd. and 786 N and S Enterprises Ltd.</i>
Golden Touch Construction Inc. 10917 167A Ave NW Edmonton, Alberta T5X 2Z1	Email: golden.touch2006@gmail.com	<i>Secured Creditor of ANS 1993 Ltd.</i>
Trust Law 10007 80 Ave NW Edmonton, Alberta T6E 1T4	Email: info@trustlawyeg.com	<i>ANS 1993 Ltd. and 2242246 Alberta Ltd.</i>
TD Auto Finance (Canada) Inc. Box 4086, Station A Toronto, Ontario M5W 5K3	Registered Mail and Email: albertaprod@teranet.ca	<i>Secured Creditor of 1416452 Alberta Ltd. and Razia Qarni</i>
ICapital Financial Services Corp. 68 Jutland Road Block B, Suite 23 Toronto, Ontario M8Z 0G7	Email: diane@icapital.ca	<i>Secured Creditor of 1416452 Alberta Ltd., 2308213 Alberta Ltd. and P & N Development Ltd.</i>
Canacap 2505101 Buchan Montreal, QC H4P 2R9	Email: funding@canacap.ca	<i>Secured Creditor of 1416452 Alberta Ltd. and Razia Qarni</i>
The City of Edmonton Box 1935, Station Main Edmonton, Alberta T5J 2P3	Registered Mail	<i>Secured Creditor of 2242246 Alberta Ltd.</i>
Morrison LLP 6940 – 76 Avenue, NW Edmonton, Alberta T6B 2R2	Email: reception@morrisonllp.com	<i>Secured Creditor of 2242246 Alberta Ltd.</i>
The Bank of Nova Scotia 10 Wright Boulevard Stratford, Ontario N5A 7X9	Courier and Email: albertaprod@teranet.ca	<i>Secured Creditor of 2308213 Alberta Ltd. and Razia Qarni</i>

Business Development Bank of Canada c/o Miller Thomson LLP 525 8 th Ave. SW, 434 rd Floor Calgary, Alberta T2P 1G1	Email: ntaylor-smith@millerthomson.com legalwfsc@bdc.ca	Secured Creditor of 786 N and S Enterprises Ltd and Razia Qarni.
ATB Financial - 07319 350 Manning Crossing N.W. Edmonton, Alberta T5A 5A1	Email: pprnotices@atb.com	Secured Creditor of P & N Development Ltd.
Mercedes-Benz Financial Services Canada Corporation 2680 Matheson Blvd. E, Suite 500 Mississauga, Ontario L4W 0A5	Courier and Email: albertaprod@trader.ca	Secured Creditor of P & N Development Ltd. and Razia Qarni
Computershare Trust Company of Canada c/o Haventree Bank P.O. Box 22248 Bankers Hall Calgary, Alberta T2P 4J6	Registered Mail	Secured Creditor of Razia Qarni
Zenco Solutions Ltd. 2607 Ellwood Drive SW Edmonton, Alberta T6X 0P7	Email: sbvmcorp@gmail.com	Secured Creditor of Razia Qarni
Canada Revenue Agency 220 4 th Avenue SE Calgary, Alberta T2G 0L1	Fax: 1 (833) 697 2389	CRA
Brownlee LLP 2200 Commerce Place 10155 – 102 nd Street Edmonton, Alberta T5J 4G8 Attention: Michael Coombs Elizabeth Robert	Email: mcoombs@brownleelaw.com erobert@brownleelaw.com	Counsel to the Government of Alberta
Bishop & McKenzie LLP Suite 2300, 10180 – 101 Street Edmonton, Alberta T5J 1V3 Attention: Joshua S. Fortier	Email: jfortier@bmlp.ca	Former Counsel to ANS 1993 Ltd., 1416452 Alberta Ltd., 2242246 Alberta Ltd., 2308213 Alberta Ltd., 786 N and S Enterprises Ltd., P & N Development Ltd. and Razia Qarni Courtesy email only for August 12 application

Schedule "B" – Draft Form of Order

Clerk's Stamp:

COURT FILE NUMBER	2603 14087
COURT	COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE	EDMONTON
	IN THE MATTER OF THE INTERIM RECEIVERSHIP OF ANS 1993 LTD. et al.
PLAINTIFF	ROYAL BANK OF CANADA
DEFENDANTS	ANS 1993 LTD., 1416452 ALBERTA LTD., 2242246 ALBERTA LTD., 2308213 ALBERTA LTD., 786 N AND S ENTERPRISES LTD., P & N DEVELOPMENT LTD. and RAZIA QARNI
DOCUMENT	<u>ORDER- APPROVAL OF INTERIM RECEIVER'S ACTIVITIES AND FEES</u>
ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	DENTONS CANADA LLP Bankers Court 15th Floor, 850 - 2nd Street S.W. Calgary, Alberta T2P 0R8 Attention: Afshan Naveed, KC Ph. (403) 268-7015 Fx. (403) 268-3100 File No.: 704083-1

DATE ON WHICH ORDER WAS PRONOUNCED	August 12, 2026
LOCATION WHERE ORDER WAS PRONOUNCED	Edmonton, Alberta
NAME OF JUSTICE WHO MADE THIS ORDER	The Honourable Justice M.E. Burns

UPON THE APPLICATION by AlixPartners Restructuring, Inc. ("**AlixPartners**"), in its capacity as the Court-appointed interim receiver (the "**Interim Receiver**") of all of the current and future assets, undertakings and properties of every nature and kind whatsoever, and wherever situate, including all proceeds thereof (the "**Property**") of ANS 1993 Ltd., 1416452 Alberta Ltd., 2242246 Alberta Ltd., 2308213 Alberta Ltd., 786 N and S Enterprises Ltd. and P & N Development Ltd. (collectively, the "**Debtors**"); **AND UPON** reading the First Report of the Interim Receiver, dated August 4, 2026 ("**First Report**"), **AND UPON** reading the Fee Affidavit of Jason Knight, sworn August 4, 2026; **AND UPON** having read the Affidavit of Service, filed; **AND UPON** hearing submissions from counsel as to service with respect to the Application; **AND UPON** hearing submissions of counsel to the Interim Receiver and counsel for any other interested parties who may be present;

IT IS HEREBY ORDERED AND DECLARED THAT:

SERVICE

1. Service of notice of this application and supporting materials, as set out in the Affidavit of Service, is hereby declared to be good and sufficient, and no other person is required to have been served with notice of this application, and time for service of this application is abridged to that actually given.

APPROVAL OF ACTIVITIES AND ACCOUNTS

2. The actions, conduct and activities of the Interim Receiver, as set out in the First Report, are hereby ratified and approved.
3. The Interim Receiver's accounts for professional fees and disbursements, as set out in the First Report, are hereby approved without the necessity of a formal passing of its accounts.
4. The accounts of the Interim Receiver's legal counsel, Dentons Canada, LLP, for its professional fees and disbursements, as set out in the First Report, are hereby approved without the necessity of a formal assessment of its accounts.

MISCELLANEOUS

Service

5. Service of this Order shall be deemed good and sufficient by:
 - (a) serving the same on:
 - (i) the persons listed on the service list created in these proceedings;
 - (ii) any other person served with notice of the application for this Order;
 - (iii) any other parties attending or represented at the application for this Order; and
 - (b) posting a copy of this Order on the Interim Receiver's website established in connection with these proceedings, for no less than six months from the date of this Order;and service on any other person is hereby dispensed with.
6. Service of this Order may be effected by facsimile, electronic mail, personal delivery or courier. Service is deemed to be effected the next business day following transmission or delivery of this Order.

Justice of the Court of King's Bench of Alberta