VANCOUVER
OCT 05 2026
REGISTRY

NO. S267204
VANCOUVER REGISTRY

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

BETWEEN:

BANK OF MONTREAL

PETITIONER

AND:

CANSTAR RESTORATIONS LIMITED PARTNERSHIP, by its general partner CANSTAR RESTORATIONS GP INC., CANSTAR RESTORATIONS GP INC., and L.U.N.A RESTORATIONS INC.

RESPONDENTS

## NOTICE OF HEARING OF APPLICATION

To: Service List attached as **Schedule "A"**

TAKE NOTICE that the notice of application of the Petitioner, Bank of Montreal, dated October 5, 2026, will be heard by the Honourable Justice Stephens at the courthouse at 800 Smithe Street, in the City of Vancouver, in the Province of British Columbia on Thursday, October 8, 2026, at 10:00 a.m. **This matter has been booked through trial scheduling.**

**1 Service**

☒ The notice of application was served on: October 5, 2026

☐ The application response(s) was(were) served on.

☐ No application response has been served and the time to serve a response has expired.

**2 Date of Hearing**

☐ The parties have agreed as to the date of the hearing of the application.

☐ The parties have been unable to agree as to the date of the hearing but notice of the hearing will be given to the application respondents in accordance with Rule 8-1 (14.5) of the Supreme Court Civil Rules.

☒ The application is unopposed, by consent or without notice.

**3 Duration of hearing**

☐ It has been agreed by the parties that the hearing will take .

☒ The parties have been unable to agree as to how long the hearing will take and

(a) the time estimate of the applicant is 10 minutes, and

(b) ☐ the time estimate of the application respondent(s) is .

☒ the application respondent(s) has(ve) not given a time estimate.

**4 Jurisdiction**

☐ This matter is within the jurisdiction of an Associate Judge.

☒ This matter is not within the jurisdiction of an Associate Judge.
**Justice Stephens is seized of this matter.**

☐ The application is a Summary Trial brought under Rule 9-7.

☐ The application is seeking a Final Order.

☐ The application is seeking injunctive relief.

**5 Orders sought**

The orders being sought are as set out in the Notice of Application dated October 5, 2026.

Dated at the City of Vancouver, in the Province of British Columbia, this 5th day of October. 2026

Signature of lawyer for the Applicant
Baylee Hunt

This Notice of Hearing of Application is filed by Baylee Hunt, of the law firm of Lawson Lundell LLP, whose place of business and address for delivery is 1600 – 925 West Georgia Street, Vancouver, British Columbia, V6C 3L2, e-mail address: bhunt@lawsonlundell.com; telephone number: 604-685-3456.

**Schedule "A"**

No. S-267204
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

BETWEEN:

BANK OF MONTREAL

PETITIONER

AND

CANSTAR RESTORATIONS LIMITED PARTNERSHIP by its General Partner Canstar Restorations GP Inc., CANSTAR RESTORATIONS GP INC. AND L.U.N.A RESTORATIONS INC.

RESPONDENTS

**SERVICE LIST**

**As at October 5, 2026**

| | |
|---|---|
| **Fasken Martineau DuMoulin LLP**<br>550 Burrard St #2900<br>Vancouver, BC V6C 0A3<br><br>Attention: Kibben Jackson<br>Jessica Cameron<br>Tiffany Bennett<br>Email: kjackson@fasken.com<br>jcameron@fasken.com<br>tbennett@fasken.com<br>jbeaulieu@fasken.com<br><br>*Counsel to AlixPartners Restructuring, Inc.* | **AlixPartners Restructuring, Inc.**<br>220 Bay Street, 13th Floor<br>Toronto, ON M5J 2W4<br><br>Attention: Bobby Kofman<br>Ben Luder<br>Tony Trifunovic<br>Email: robert.kofman@alixpartners.com<br>ben.luder@alixpartners.com<br>tony.trifunovic@alixpartners.com<br><br>*Proposed Receiver* |
| **Lawson Lundell LLP**<br>Cathedral Place<br>925 W Georgia St #1600<br>Vancouver, BC V6C 2L1<br><br>Attention: Jack Maslen<br>William Roberts<br>Baylee Hunt<br>Email: jmaslen@lawsonlundell.com<br>wroberts@lawsonlundell.com<br>bhunt@lawsonlundell.com<br>ccurran@lawsonlundell.com<br><br>*Counsel for the Petitioner* | |

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| **Blake, Cassels & Graydon LLP**<br>1133 Melville St #3500<br>Vancouver, BC V6E 4E5<br><br>Attention : John-Paul Bogden<br>Email : jp.bogden@blakes.com<br><br>*Counsel for the Respondents* | **Canstar Restorations Limited Partnership**<br>**Canstar Restorations GP Inc.**<br>**L.U.N.A Restorations Inc.**<br><br>**c/o Fulcrum Capital Partners Inc.**<br>885 West Georgia Street, Suite 1020<br>Vancouver, BC V6C 3E8<br><br>Attention : Graham Flater<br>Greg Collings<br>Email : graham.Flater@fulcrumcapital.ca<br>greg.collings@fulcrumcapital.ca<br><br>*Respondents* |
| **Premium Restoration Inc.**<br>6901 72 St #212<br>Delta, BC V4G 0A2<br><br>Attention: Fabio Infanti<br>Email: fabio@premiumrestoration.com<br><br>*Interested Party* | **Borden Ladner Gervais LLP**<br>200 Burrard Street, Suite 1200<br>Vancouver, BC V7X 1T2<br><br>Attention: Andrew Hennigar<br>Ryan Laity<br>Email: ahennigar@blg.com<br>rlaity@blg.com<br><br>*Counsel to Premium Restorations Inc.* |
| **Creditors** | |
| **Foss National Leasing Ltd.**<br>801 – 125 Commerce Valley Dr W<br>Markham, ON L3T 7W4<br><br>Attention: Andrew Kines<br>Susan Traynor<br>Steve Rotz<br>Email: akines@fossnational.com;<br>straynor@fossnational.com;<br>srotz@fossgroup.com;<br>credit@fossnational.com; | **Farmington Leasing Limited**<br>30 Quarry Ridge Road,<br>Barrie, ON L4M 7G1<br><br>Attention: Jim Johnson<br><br>Email: jimjohnson@farmingtonleasing.ca |
| **Wells Fargo Equipment Finance Company**<br>1100 – 1290 Central Parkway W<br>Mississauga, ON LRC 4R3 | **FCP Canstar HoldCo Inc.,**<br>**as Security Agent**<br>885 West Georgia St, Ste 1020<br>Vancouver, BC V6C 3E8 |
| **Meridian OneCap Credit Corp.**<br>204 – 3185 Willingdon Green<br>Burnaby, BC V5G 4P3 | **Addison Leasing of Canada Ltd.**<br>2233 Argentia Road, Suite 303, East Tower<br>Mississauga, ON L5N 2X7 |

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|---|---|
| **Fulcrum Capital Partners Inc.**<br>885 West Georgia Street, Suite 1020<br>Vancouver, BC V6C 3E8<br><br>Attention: Graham Flater<br>Email: graham.Flater@fulcrumcapital.ca | **Enterprise Fleet Management Canada, Inc.**<br>13160 88 Ave<br>Surrey, BC V3W 3K3 |
| **Surlang Roofing Ltd.**<br>#6-19585 56 Ave,<br>Surrey, BC, V3S 6K3<br><br>Attention: Bryon Cozicar<br>Email: bryon@surlangroofing.com | **JM Electric Ltd.**<br>c/o Linley Welwood LLP<br>305-2692 Clearbrook Road<br>Abbotsford, BC, V2T 2Y8<br><br>Attention: Justin W. Klassen<br>Email: jklassen@linleywelwood.com;<br>accounts@jmelectricltd.com; |
| **Mira Floors Ltd.**<br>c/o Baker Newby LLP<br>200-2955 Gladwin Road<br>Abbotsford, BC, V2T 5T4<br><br>Attention: Adnan N. Habib<br>Email: AHabib@bakernewby.com;<br>MTaylor@bakernewby.com; | |
| **Government Entities** | |
| **Canada Revenue Agency**<br>9737 King George Boulevard<br>Surrey, BC V3T 5W6<br><br>Tel.: (236) 334-6526<br>Fax: (604) 658-2700 | **Canada Revenue Agency**<br>His Majesty The King in Right of Canada<br>Deputy Attorney General<br>British Columbia Regional Office<br>Department of Justice Canada<br>900 – 840 Howe Street<br>Vancouver, BC V6Z 2S9<br><br>Email:<br>Vancouver.TaxLawServices@justice.gc.ca |
| **His Majesty The Kin in Right of British Columbia**<br>**Attorney General for British Columbia**<br>PO Box 9280 Stn Prov Govt<br>Victoria, BC V8W 9J7<br><br>Email: AGLSBRevTaxInsolvency@gov.bc.ca | **Office of the Superintendent of Bankruptcy Canada**<br>300 West Georgia St, Suite 2000<br>Vancouver, BC V6B 6E1<br><br>Email: osbservice-bsfservice@ised-isde.gc.ca |

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| **Alberta Justice**<br>**Alberta Finance & Treasury Legal Team**<br>**Legal Services Division**<br>2nd Floor, Peace Hills Trust<br>10011 – 109 Street<br>Edmonton, AB T5J 3S8<br><br>Attention: Scott Chen<br>Fidaa Joumaa<br>Rachelle Sorgiovanni<br>Email: scott.chen@gov.ab.ca<br>fidaa.joumaa@gov.ab.ca<br>rachelle.sorgiovanni@gov.ab.ca | **Saskatchewan Justice and Attorney General**<br>**Legal Services Division**<br>**Civil Law Branch**<br>900 - 1874 Scarth Street<br>Regina, SK, S4P 4B3<br><br>Attention: Rachel Haack<br>Laura Mazenc<br>Justin Stevenson<br>Email: rachel.haack@gov.sk.ca<br>laura.mazenc@gov.sk.ca<br>justin.stevenson@gov.sk.ca |
| **Facility Lessors** | |
| **Boma Industries Ltd.**<br>760 Rochester Avenue<br>Coquitlam, BC V3K 2V8<br><br>Email: boma.industries@outlook.com | **Gatz Holdings Ltd.** (Has an Excluded Lease as Well)<br>(Landlord – Surrey Lease Canstar Restorations GP Inc.)<br>870 Barber Street<br>Port Moody, BC V3H 3V4<br><br>Attention: Jay Dargatz<br>Email: Jaygatz57@outlook.com; |
| **Sierra Developments Ltd.**<br>4446 Rehsler Pl<br>Chilliwack, BC V2T 6Z5<br><br>Email: sierraelectric.ltd@gmail.com<br><br>**Gordon Creek Law**<br>1768 Amble Greene Drive<br>Surrey, B.C. V4A 6P4<br><br>Attention: M. Jeanne Meyers<br>Email: jeanne@gordoncreeklaw.ca<br><br>*Counsel for Sierra Developments Ltd.* | **Southbridge Business Park (II) Ltd.**<br>Suite 2000, 595 Burrard Street<br>Vancouver, BC V6C 0E4<br><br>Email: trevor.smith@wesgroup.ca<br><br>**McCarthy Tétrault LLP**<br>745 Thurlow Street, Suite 2400<br>Vancouver BC, V6E 0C5, CA<br><br>Attention: Katherine Griffin<br>Email : kgriffin@mccarthy.ca<br><br>*Counsel for Southbridge Business Park (II) Ltd.* |
| **CML Properties**<br>272 Lansdowne St.<br>Kamloops, BC V2C 1X7<br><br>Email: info@cmlproperties.ca | **GSRD Commercial Investment Corp.**<br>c/o Campbell Froh May & Rice LLP<br>200-5611 Cooney Road<br>Richmond, BC V6X 3J6<br><br>Attention: Arondeep S. Mand<br>Email: amand@cfmrlaw.com;<br>ksugasawa@cfmrlaw.com;<br>greg_nikkel@hotmail.com |

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| **Hyatt Auto Sales Ltd.**<br>1311 - 9th Avenue SW, Suite 300<br>Calgary, AB T3C 0H9<br><br>Email: etrieu@hyattgroup.com | **1167893 B.C. Ltd. / Element 29 Ventures Ltd.**<br>1302 Green Bay Rd<br>West Kelowna, BC, V4T 2B6<br><br>Attention: Chad Ulansky<br>Email: CUlansky@metalexventures.ca |
| **Rollyworks Ventures Inc.**<br>201-4548 Lakelse Ave<br>Terrace, BC V8G 1P8<br><br>Email: controller@rollyworks.com | **Bandstra Ventures Ltd.**<br>Box 3726<br>Smithers, BC V0J 2N0<br><br>Email: mband@telus.net |
| **KTG Holdings Ltd.**<br>#614 - 1488 Fourth Avenue<br>Prince George, BC V2L 4Y2<br><br>Attention: Geredina Zwiers<br>Email: gzwiers@telus.net | **JCL Holdings Ltd.**<br>#101, 17839 - 106A Avenue<br>Edmonton, AB T5S 1V8<br><br>Attention: Blaine Jackson<br>Email : blainejackson@lydale.com |
| **Andre Holdings Ltd.**<br>3318 Millar Avenue<br>Saskatoon, SK S7K 7G9<br><br>Attention: Aaron Andre<br>Email: andreholdingssk@gmail.com | **Triple H Enterprises Inc.**<br>300, 10240 - 124 Street<br>Edmonton, Alberta T5N 3W6<br><br>Attention: Christel Mohr<br>Email: commercial@groupthree.ca |
| **Vista Holdings Ltd.**<br>207, 5920 - 1A Street SW<br>Calgary, AB T2H 0G3<br><br>Email: harminholdings@shaw.ca | |
| **Retained Contracts (Customers)** | |
| **Co-operators Financial Services Limited**<br>130 Macdonell Street<br>Guelph, ON N1H 6P8<br><br>Attention: Patty Gerard<br>Email: patty_gerard@cooperators.ca | **Sandbox Mutual Insurance Company**<br>250 Willis Cres<br>Saskatoon, SK S7T 0V2<br><br>Attention: Lowen Genoway<br>Email: lGenoway@sandbox.ca |
| **University of Alberta**<br>348 Materials Management Building<br>8415 - 117 Street NW<br>Edmonton, AB T6G 2R3<br><br>Attention: Joe Rollheiser<br>Email: jrollhei@ualberta.ca | **University of Regina**<br>3737 Wascana Parkway<br>Regina, SK S4S 0A2<br><br>Attention: Amber Gunnlaugson<br>Email: amber.gunnlaugson@uregina.ca |

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| **University of Saskatchewan**<br>110 Maintenance Road<br>Saskatoon, SK S7N 5C5<br><br>Email: procurement@usask.ca | **Alberta Motor Association Insurance Company**<br>11220 - 109 St<br>Edmonton, AB T5G 2T6<br><br>Attention: Jordan Andrew<br>Email: jordan.andrew@ama.ab.ca |
| **CAA Insurance Company**<br>60 Commerce Valley Drive East<br>Thornhill, ON L3T 7P9<br><br>Attention: Neil Prosty<br>Email: npro@caasco.ca | **Crawford Contractor Connection**<br>#200 - 2300 University Ave<br>Waterloo, ON N2K 0A2<br><br>Email:<br>CanadianPerformanceManagers@ContractorConnection.ca |
| **Contracktor**<br>4112 Hendreson Rd<br>Harrowsmith, ON K0H 1V0<br><br>Attention: Kim Shuen<br>Email: kshuen@contracktor.ca | **Desjardins General Insurance Group**<br>5-100 rue des Commandeurs<br>Levis, QC G6V 7N5<br><br>Attention: Luc Gagné<br>Email: luc.gagne@dgag.ca |
| **Intact Financial Corporation**<br>700 University Avenue<br>Toronto, ON M5G 0A1<br><br>Attention: Jhin Kwon<br>Email: jhin.kwon@intact.net | **The Wawanesa Mutual Insurance Company**<br>191 Broadway Avenue<br>Winnipeg, MB R3C 3P1<br><br>Attention: Kayla Guynup<br>Email: kguynup@wawanesa.com |
| **The Board of Education of School District No. 36 (Surrey)**<br>14033 92nd Ave<br>Surrey, BC V3V 0B7<br><br>Attention: Cathy Xu<br>Email: xu_c@surreyschools.ca | **BCNET**<br>Suite 750-555 Seymour Street<br>Vancouver, BC V6B 3H6<br><br>Attention: Dennis Silva<br>Email: dennis.silva@bc.net |
| **Max Insurance**<br>72 Victoria St. S, Unit 210<br>Kitchener, ON N2G 4Y9<br><br>Attention: Marguerite Palombella<br>Email: mpalombella@maxinsurance.ca | **Co-operators Financial Services Limited**<br>130 Macdonell Street<br>Guelph, ON N1H 6P8<br><br>Email: Contracts@cooperators.ca |

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| **BC Housing**<br>1701-4555 Kingsway Avenue<br>Burnaby BC V5H 2A7<br><br>Email: webhazmat@bchousing.org | **Aviva Canada Inc.**<br>Attention: Gwen Cheung<br>Stacey Conway<br><br>Email: gwen.cheung@aviva.com;<br>stacey.conway@aviva.com<br><br>**c/o Counsel – Stikeman Elliott LLP**<br>666 Burrard Street, Suite 2700<br>Vancouver, BC V6C 2X8<br><br>Attention: Shona Sinclair<br>Email: ssinclair@stikeman.com |
| **Facility Plus**<br>5155 Spectrum Way, Building No. 21<br>Mississauga, ON L4W 5A1<br><br>Email: serviceteam10@facilityplus.com | **City of Surrey**<br>13450-104 Avenue<br>Surrey BC V3T 1V8<br><br>Re: Jeff Schaafsma<br><br>Attention: Laura Gray<br>Email: Lgray@surrey.ca |
| **Township of Langley**<br>20338 - 65 Avenue<br>Langley BC V2Y 3J1<br><br>Attention: Jane Houweling<br>Email: jhouweling@tol.ca | **Symbility**<br>30 Adelaide East, Suite 500<br>Toronto ON M5C 3G8<br><br>Attention: James Swayze<br>Email: jswayze@symbilitysolutions.com |
| **Others** | |
| **Heseltine-Richardson Associates Inc.**<br>(Landlord – Kamloops Lease ABK)<br>215 - 179 Davie Street<br>Vancouver BC V6Z 2Y1<br><br>*Interested Party* | **DLA Piper (Canada) LLP**<br>1133 Melville St Suite 2700<br>Vancouver, BC V6E 4E5<br><br>Attention: Jeffrey Bradshaw<br>Email: jeffrey.bradshaw@ca.dlapiper.com<br><br>*Counsel to Canstar Construction Ltd. as an interested party* |

## EMAIL SERVICE LIST

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## COURIER SERVICE LIST

**Wells Fargo Equipment Finance Company**
1100 – 1290 Central Parkway W
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**FCP Canstar HoldCo Inc.,**
**as Security Agent**
885 West Georgia St, Ste 1020
Vancouver, BC V6C 3E8

**Meridian OneCap Credit Corp.**
204 – 3185 Willingdon Green
Burnaby, BC V5G 4P3

**Addison Leasing of Canada Ltd.**
2233 Argentia Road, Suite 303, East Tower
Mississauga, ON L5N 2X7

**Enterprise Fleet Management Canada, Inc.**
13160 88 Ave
Surrey, BC V3W 3K3

**Heseltine-Richardson Associates Inc.** (Landlord – Kamloops Lease ABK)
215 - 179 Davie Street
Vancouver BC V6Z 2Y1

**JCL Holdings Ltd.**
#101, 17839 - 106A Avenue
Edmonton, AB T5S 1V8

**Township of Langley**
20338 - 65 Avenue
Langley BC V2Y 3J1