



December 19, 2023

**Via E-Mail, Fax and Courier**

joliver@cassels.com  
tel: +1 403 351 2921  
file # 58965-1

**Attention: See enclosed Service List**

Dear Sirs and Mesdames:

**Re: Court File No. 2301-16982  
In the Matter of Compromise or Arrangement of Candesto Enterprises Corp., D3  
Infrastructure Services Inc. and Safe Roads Alberta Ltd. (collectively, the “Companies”)  
Application scheduled for Wednesday, December 20, 2023 at 2:00 PM (the “Application”)**

We are counsel to the Companies.

Further to the above-referenced matter and our correspondence of December 18, 2023, please find enclosed the following materials, which the Companies intend to rely on during the Application:

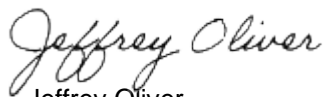
1. Proof of filing of the Originating Application, which attaches to it as Schedule “A” the Service List, Schedule “B” a draft CCAA Initial Order, and Schedule “C” a drafted Amended and Restated CCAA Initial Order, filed December 19, 2023;
2. Proof of filing of the Affidavit of Jan van Bruggen, filed December 19, 2023;
3. Proof of filing of the Consent to Act as Monitor of Alvarez & Marsal Canada Inc., filed December 19, 2023;
4. Bench Brief of the Applicants, dated December 19, 2023; and
5. Secretarial Affidavit of Maria Kim, sworn December 19, 2023.

Proofs of filing of the Bench Brief and Secretarial Affidavit will follow upon receipt of same. Please note that due to size, the Book of Authorities of the Applicants will be uploaded to the TitanFile Channel but not sent via email.

We trust that you will find the foregoing to be in order, but please do not hesitate to contact the undersigned should you require anything further.

Yours truly,

Cassels Brock & Blackwell LLP

A handwritten signature in black ink that reads "Jeffrey Oliver". The signature is written in a cursive, flowing style.

Jeffrey Oliver  
Partner

JO/ag  
Enclosure

**Counsel: Please ensure that all relevant parties have received Webex information.**

**Virtual Courtroom 61** has been assigned for the above noted matter:

Virtual Courtroom Link:

<https://albertacourts.webex.com/meet/virtual.courtroom61>

Instructions for Connecting to the Meeting

1. Click on the link above or open up Chrome or Firefox and cut and paste it into your browser address bar.
2. If you do not have the Cisco Webex application already installed on your device, the site will have a button to install it. Follow installation instructions. Enter your full name and email address when prompted
3. Click on the **Open Cisco Webex Meeting**.
4. You will see a preview screen. Click on **Join Meeting**.

Key considerations for those attending:

1. Please connect to the courtroom **15 minutes prior** to the start of the hearing.
2. Please ensure that your microphone is muted and remains muted for the duration of the proceeding, unless you are speaking. Ensure that you state your name each time you speak.
3. If bandwidth becomes an issue, some participants may be asked to turn off their video and participate by audio only.
4. **Note: Recording or rebroadcasting of the video is prohibited.**
5. **Note: It is highly recommended you use headphones with a microphone or a headset when using Webex. This prevents feedback.**

For more information relating to Webex protocols and procedures, please visit:

<https://www.albertacourts.ca/qb/court-operations-schedules/webex-remote-hearings-protocol>

You can also join the meeting via the "Cisco Webex Meetings" App on your smartphone/tablet or other smart device. You can download this via the App marketplace and join via the link provided above.

COURT FILE NUMBER 2301 - 16982

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

IN THE MATTER OF THE COMPANIES' CREDITORS  
ARRANGEMENT ACT, RSC 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR  
ARRANGEMENT OF CANDESTO ENTERPRISES CORP., D3  
INFRASTRUCTURE SERVICES INC. and SAFE ROADS ALBERTA  
LTD.

APPLICANTS CANDESTO ENTERPRISES CORP., D3 INFRASTRUCTURE  
SERVICES INC. and SAFE ROADS ALBERTA LTD.

DOCUMENT **SERVICE LIST**  
(Updated December 19, 2023)

PARTY	METHOD OF DELIVERY	ROLE/INTEREST
<b>CASSELS BROCK &amp; BLACKWELL LLP</b> Bankers Hall West 3810, 888 3 St SW Calgary, Alberta T2P 5C5  <b>Jeffrey Oliver</b> Tel: 403.351.2921 Email: <a href="mailto:JOliver@cassels.com">JOliver@cassels.com</a>  <b>Danielle Marechal</b> Tel: 403.351.2922 Email: <a href="mailto:DMarechal@cassels.com">DMarechal@cassels.com</a>  <b>Natalie Thompson</b> Tel : 587.441.3064 Email: <a href="mailto:NThompson@cassels.com">NThompson@cassels.com</a>	Email	Counsel to the Applicants
<b>CANDESTO ENTERPRISES CORP.</b> 2205-500 4 Ave SW Calgary, Alberta, T2P2V8  <b>Jan van Bruggen</b> <b>Jenny Stone</b>  Email: <a href="mailto:jb@barricadesandsigns.com">jb@barricadesandsigns.com</a> <a href="mailto:jenny@barricadesandsigns.com">jenny@barricadesandsigns.com</a>	Email	Applicant

PARTY	METHOD OF DELIVERY	ROLE/INTEREST
<b>D3 INFRASTRUCTURE SERVICES INC.</b> 25213 Hwy 37, Sturgeon County Alberta, T8T0G4  <b>Jan van Bruggen</b> <b>Jenny Stone</b>  Email: <a href="mailto:jb@barricadesandsigns.com">jb@barricadesandsigns.com</a> <a href="mailto:jenny@barricadesandsigns.com">jenny@barricadesandsigns.com</a>	Email	Applicant
<b>Safe Roads Alberta Ltd.</b> 2205-500 4 Ave SW Calgary, Alberta, T2P2V8  <b>Jan van Bruggen</b> <b>Jenny Stone</b>  Email: <a href="mailto:jb@barricadesandsigns.com">jb@barricadesandsigns.com</a> <a href="mailto:jenny@barricadesandsigns.com">jenny@barricadesandsigns.com</a>	Email	Applicant
<b>Alvarez &amp; Marsal Canada Inc.</b> Suite 1110, 250 6th Avenue SW Calgary, Alberta, T2P 3H7  <b>Orest Konowalchuk</b> <b>Bryan Krol</b>  Email: <a href="mailto:okonowalchuk@alvarezandmarsal.com">okonowalchuk@alvarezandmarsal.com</a> <a href="mailto:bkrol@alvarezandmarsal.com">bkrol@alvarezandmarsal.com</a>	Email	Proposed Monitor
<b>Gowling WLG</b> 1600, 421 7th Avenue SW, Calgary, Alberta, T2P 4K9  <b>Sam Gabor</b> Email: <a href="mailto:Sam.gabor@gowlingwlg.com">Sam.gabor@gowlingwlg.com</a>	Email	Counsel to Proposed Monitor

GOVERNMENT AGENCIES		
<b>Canada Revenue Agency</b> <b>c/o Surrey National Verification and Collection Centre</b> 9755 King George Blvd Surrey, BC V3T 5E1  Fax: 1 866 219 0311 <b>Canada Revenue Agency</b> 220 4 Ave SE Calgary, AB T2G 0L1	Fax	Potential Creditor

<b>GOVERNMENT AGENCIES</b>		
Fax: 403 264 5843		
<b>Department of Justice Canada</b> Prairie Regional Office — Edmonton 300 Epcor Tower 10423 101 St NW Edmonton, AB T5H 0E7  Email: <a href="mailto:agc_pgc_alberta@justice.gc.ca">agc_pgc_alberta@justice.gc.ca</a>	Courier & Email	Potential Counsel to Canada Revenue Agency

<b>INTERESTED PARTIES</b>		
<b>1288078 Ontario Inc.</b> c/o Maniaci Law Offices 80 Carlauren Road Suite 23 Vaughan, ON L4L 7Z5  <b>Anthony Maniaci</b> Email: <a href="mailto:aomaniaci@msalaw.ca">aomaniaci@msalaw.ca</a>	Email	PPR Registrant
<b>1964740 Alberta Inc.</b> c/o Maniaci Law Offices 80 Carlauren Road Suite 23 Vaughan, ON L4L 7Z5  <b>Anthony Maniaci</b> Email: <a href="mailto:aomaniaci@msalaw.ca">aomaniaci@msalaw.ca</a>	Email	Shareholder
<b>Trisura Guarantee Insurance Company</b> c/o Hub International Limited 595 Bay Street, Suite 900 Toronto, ON M5G 2E3  <b>Mark Pupo</b> Email: <a href="mailto:mark.pupo@hubinternational.com">mark.pupo@hubinternational.com</a>  <b>Michael Lentner</b> Email: <a href="mailto:michael.lentner@hubinternational.com">michael.lentner@hubinternational.com</a>	Email	Creditor
<b>Rose LLP</b> 2100, 440 – 2 Avenue SW Calgary, AB T2P 5E9  <b>Andrew Wilkinson</b> Email: <a href="mailto:Andrew.Wilkinson@RoseLLP.com">Andrew.Wilkinson@RoseLLP.com</a>	Email	Counsel for Trisura Guarantee Company
<b>Vor Allem Consulting Ltd.</b> 3400, 350 – 7 Avenue SW	Courier/Email	Creditor

<b>INTERESTED PARTIES</b>		
<p>Calgary, AB T2P 3N9</p> <p><b>Perry Feldman</b> Email: <a href="mailto:cgycorp@Fasken.com">cgycorp@Fasken.com</a></p>		
<p><b>Batavi Venture Group Inc.</b> c/o HGA Law 200, 16011 – 116 Ave NW Edmonton, AB T5M 3Y1</p> <p><b>Jason A. Banack</b> Email: <a href="mailto:jbantack@hgalaw.ca">jbantack@hgalaw.ca</a></p>	Email	Shareholder
<p><b>Powell (Richmond Hill) Contracting Limited</b> 180 Ram Forest Road, Stouffville, Ontario, L4A 2G8</p> <p><b>Lisa Laronde</b> Email: <a href="mailto:llaronde@powell.ca">llaronde@powell.ca</a></p>	Email	PPR Registrant for Safe Roads Highway Products Alberta Inc.
<p><b>CBPG Real Estate Holdings Inc.</b> c/o Registered Office LMC Law 1500, 203 – 5 Avenue SW Calgary, AB T2P 2V7</p>	Courier	Creditor
<p><b>Chris Boenkfour</b> 2205, 500 - 4 Avenue SW, Calgary, Alberta, T2P 2V6</p>	Courier	Creditor
<p><b>McLennan Ross LLP</b> 1900, 600 – 3 Avenue SW Calgary, AB T2P 0G5</p> <p><b>Taylor Campbell</b> Email: <a href="mailto:taylor.campbell@mross.com">taylor.campbell@mross.com</a></p>	Email	Counsel to Chris Boenkfour and Vor Allem Consulting Ltd.
<p><b>Barricades and Signs Ltd.</b> c/o HGA Law 200, 16011 – 116 Ave NW Edmonton, AB T5M 3Y1</p> <p><b>Jason A. Banack</b> Email: <a href="mailto:jbantack@hgalaw.ca">jbantack@hgalaw.ca</a></p>	Email	Creditor
<p><b>ATB Financial</b> Bay 70, 2151 31 St. NE,</p>	Email	PPR Registrant

<b>INTERESTED PARTIES</b>		
Calgary, Alberta, T1Y 7G3  <b>Alex Corbett</b> Email: <a href="mailto:ACorbett@atb.com">ACorbett@atb.com</a>		
<b>Canadian Imperial Bank of Commerce</b> 1 City Drive, Suite 220 Mississauga, ON L5B 1M2  <b>Morgan Renkema</b> Email: <a href="mailto:morgan.renkema@cibc.com">morgan.renkema@cibc.com</a>	Email	PPR Registrant
<b>Kubota Canada Ltd.</b> 1155 Kubato Drive, Pickering, Ontario, L1X 0H4  Email: <a href="mailto:finance@kubota.ca">finance@kubota.ca</a>	Email	PPR Registrant
<b>CWB National Leasing Inc.</b> 1525 Buffalo Place, Winnipeg, Manitoba, R3T 1L9  Email: <a href="mailto:pdsa.adminstration@cwbnationalleasing.com">pdsa.adminstration@cwbnationalleasing.com</a>	Email	PPR Registrant
<b>Kal Tire</b> 1540 Kalamalka Lake Rd. Vernon, British Columbia V1T 6N6	Courier	PPR Registrant
<b>Nova Pole International Inc.</b> 2579 188 Street, Surrey, British Columbia, V3Z 2A1  <b>Att: Luis Barcan</b> Tel : 604-881-0090	Courier	Creditor