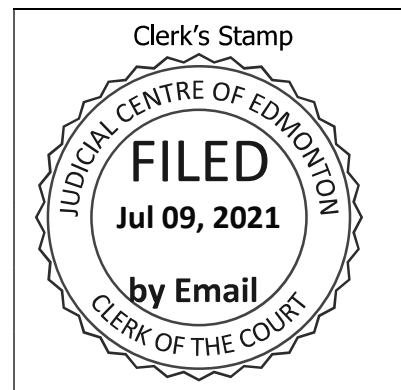


COURT FILE NO. 2103 10970
COURT COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE EDMONTON



PLAINTIFF CANADIAN WESTERN BANK
DEFENDANTS SHAMROCK VALLEY ENTERPRISES LTD.
DOCUMENT **STATEMENT OF CLAIM**

\$250 (Invoice #110025)

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
McLENNAN ROSS LLP
#600 McLennan Ross Building
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Edmonton, AB T5N 3Y4
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File No.: 20212853

NOTICE TO DEFENDANTS

You are being sued. You are a Defendant.

Go to the end of this document to see what you can do and when you must do it.

Statement of facts relied on:

1. The Plaintiff, Canadian Western Bank ("CWB") is a financial institution carrying on business in the Province of Alberta and elsewhere.
2. The Defendant Shamrock Valley Enterprises Ltd. (the "Borrower"), is a body corporate incorporated under the *Business Corporations Act* of Alberta carrying on business in the Province of Alberta.
3. Pursuant to a commitment letter January 27, 2021, as amended by letter of June 18, 2021, issued by CWB to the Borrower, CWB agreed to advance financing (the "**Loans**") to the Borrower.
4. By General Security Agreements dated March 17, 2015 and July 24, 2015, (the "**GSAs**"), the Borrower charged in favour of CWB all of its present and after acquired property.
5. The Security interests created by the GSAs are duly registered in the Province of Alberta as required by law.
6. As at June 24, 2021, the outstanding balance of the Loans was \$3,879,196.20, exclusive of unbilled costs, and interest accrues thereon at the per diem rate of \$471.63.

7. The Borrower has also defaulted under its corporate Visa credit card and the amount of \$50,000.00 is due and owing as at June 24, 2021, exclusive of unbilled costs, and interest accrues thereon at the rate prescribed in the Visa Agreement.
8. On June 25, 2021, CWB issued a demand for payment of the Loans on the Borrower but no payment has been received.

Remedy sought:

9. Judgment as against the Defendant, SHAMROCK VALLEY ENTERPRISES LTD., in the amount of \$3,879,196.20 plus interest from June 24, 2021 to the date of judgment at \$471.63 per day.
10. Judgment as against the Defendant, SHAMROCK VALLEY ENTERPRISES LTD., in the amount of \$50,000.00 plus interest from June 24, 2021 to the date of judgment at the rate prescribed in the Visa Agreement;
11. An Order for the immediate sale of the property charged by the GSAs.
12. An Order for the appointment of a Receiver and/or Receiver and Manager, without security.
13. Costs of this Action on a solicitor and his own client basis.
14. Such other relief as this Honourable Court may deem fit.

NOTICE TO THE DEFENDANTS

You only have a short time to do something to defend yourself against this claim:

20 days if you are served in Alberta;

1 month if you are served outside Alberta but in Canada; or

2 months if you are served outside Canada.

You can respond by filing a Statement of Defence or a Demand for Notice in the office of the clerk of the Court of Queen's Bench at Edmonton, Alberta, AND serving your Statement of Defence or a Demand for Notice on the Plaintiff's address for service.

WARNING

If you do not file and serve a Statement of Defence or a Demand for Notice within your time period, you risk losing the law suit automatically. If you do not file, or do not serve, or are late in doing either of these things, a Court may give a judgment to the Plaintiff against you.