

**THE KING'S BENCH  
Winnipeg Centre**

IN THE MATTER OF: THE APPOINTMENT OF A RECEIVER PURSUANT TO SECTION 243 OF *THE BANKRUPTCY AND INSOLVENCY ACT*, R.S.C. 1985, c. B-3 AS AMENDED, AND SECTION 55 OF THE *COURT OF KING'S BENCH ACT*, C.C.S.M. c. C280

BETWEEN:

**PEOPLES TRUST COMPANY,**

applicant,

- and -

**BOKHARI DEVELOPMENT INC.,**

respondent.

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**NOTICE OF MOTION  
CIVIL UNCONTESTED MOTIONS LIST  
HEARING DATE: January 30, 2025 at 10:00 am**

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**MARR FINLAYSON POLLOCK LLP**

Barristers and Solicitors  
240 River Avenue  
Winnipeg, Manitoba  
R3L 0B4

**GABRIELLE C. LISI**

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File No. 2400154

**THE KING'S BENCH  
Winnipeg Centre**

IN THE MATTER OF:      THE APPOINTMENT OF A RECEIVER PURSUANT TO  
SECTION 243 OF *THE BANKRUPTCY AND INSOLVENCY  
ACT*, R.S.C. 1985, c. B-3 AS AMENDED, AND SECTION 55  
OF THE *COURT OF KING'S BENCH ACT*, C.C.S.M. c. C280

BETWEEN:

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applicant,

- and -

**BOKHARI DEVELOPMENT INC.,**

respondent.

**NOTICE OF MOTION**

SLK CONTRACTING LTD. will make a motion before the presiding Judge on January 30, 2025, at 10:00 a.m., or as soon after that time as the motion can be heard, at the Law Courts, 408 York Avenue, Winnipeg, Manitoba.

**THE MOTION IS FOR:**

1. An order granting the recovery and possession of SLK Contracting Ltd.'s property currently in possession of the respondent or the appointed receiver of the respondent;

2. An order authorizing entry on the land and premises located at 1801 – 1825 Park Avenue in Portage la Prairie, in the Province of Manitoba, or any other location where the property might be located, for the purpose of searching for and seizing the Property; and

3. In the alternative, an interim prohibitive injunction preventing the respondent, or the respondent's receiver from selling or otherwise disposing of or taking any further action in respect of SLK Contracting Ltd.'s property, pending final determination of these issues.

**THE GROUNDS FOR THE MOTION ARE:**

1. King's Bench Rules 37.03(2), 40.01, and 45.01(1); and
2. Such further and other grounds as counsel may advise and this Honourable Court may allow.

**THE FOLLOWING DOCUMENTARY EVIDENCE** will be used at the Hearing of the Motion:

1. The Affidavit of Robert Peltonen affirmed January 8<sup>th</sup>, 2025; and
2. Such further and other material as counsel may advise this Honourable Court may allow

January 9, 2025

**MARR FINLAYSON POLLOCK LLP**  
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TO: **PEOPLES TRUST COMPANY**  
Thompson Dorfman Sweatman LLP  
1700 – 242 Hargrave Street  
Winnipeg, MB R3C 0V1  
Attention: Ross A. McFayden

AND TO: **BOKHARI DEVELOPMENT INC.**  
Knight Law Office  
202 – 900 Harrow Street E.  
Winnipeg, MB R3M 3Y7  
Attention: Wayne P. Forbes

AND TO: **KPMG INC.**  
MLT Aikins LLP  
30<sup>th</sup> Floor, 360 Main Street  
Winnipeg, MB R3C 4G1  
Attention: JJ Burnell and Anjali Sandhu

AND TO: The attached Service List