District of Alberta

Division No. 01 – Edmonton Court No. 24-2994870 Estate No. 24-2994870

FORM 12.1

Notice of Dispute

(subsection 81(2) of the Act)

In the Matter of the Bankruptcy of Pepco Pipe Services Ltd.

Of the Hamlet of Nisku, in the Province of Alberta

TAKE NOTICE THAT BDO Canada Limited, Trustee of the Estate of Pepco Pipe Services Ltd., a Bankrupt, hereby gives you Rory McDougall notice of our dispute to your Reclamation of Property Claim dated June 11, 2024, under the provisions of s. 81(2) of the *Bankruptcy and Insolvency Act*, following among other reasons:

- 1. There is no documentary evidence attached to your claim.
- 2. The two claimed "heirloom" pieces, being the "Internal Coating Oven" and "Lancing Unit", were not subject registrations at the Alberta Personal Property Registry against the Bankrupt as at the date of bankruptcy (as would be required under ss. 3(1), 3(2)(a), 19, and 20(a)(i) Personal Property Security Act for a security interest in substance, or for a lease of goods for a term of more than one year).
- 3. There is no list of any other pieces claimed.

AND TAKE NOTICE THAT unless you appeal from this dispute within 15 days from the date of this Notice of Dispute, you shall be deemed to have abandoned or relinquished all your rights to or interest in the property to the Trustee, who may thereafter sell or dispose of the property free of any lien, right, title or interest of you as the claimant.

David Leuri

DATED at Edmonton, Alberta, this 14th day of June 2024.

BDO Canada Limited Trustee of the Estate of Pepco Pipe Services Ltd., a Bankrupt