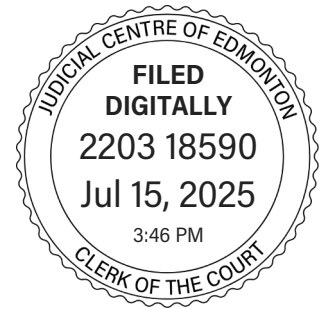


COURT FILE NUMBER 2203-18590
COURT COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE EDMONTON
PLAINTIFF/DEFENDANT BY COUNTERCLAIM 1823741 ALBERTA LTD.
DEFENDANT BY COUNTERCLAIM MICHAEL JAMES GANSER
DEFENDANT/PLAINTIFF BY COUNTERCLAIM MARK EDMUND HALDANE
APPLICANT BDO CANADA LIMITED
DOCUMENT

Clerk's stamp



ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

Stikeman Elliott LLP
Barristers & Solicitors
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File No.: 155857.1002

NOTICE TO RESPONDENT(S):

This application is made against you. You are a respondent. You have the right to state your side of this matter before the Court.

To do so, you must be in Court when the application is heard as shown below:

Date:	July 21, 2025
Time:	2:00
Where:	Calgary Courts Centre, via Webex
Before Whom:	The Honourable Justice Lema

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

Remedy claimed or sought:

1. BDO Canada Limited (“**BDO**”) is the court-appointed receiver and manager over all of the current and future assets, undertakings and properties of every nature and kind whatsoever, and wherever situate, including all proceeds thereof (the “**Property**”) of 1823741 Alberta Ltd. (“**182**”) and 1872806 Alberta Ltd. (“**187**”) and collectively with 182, the “**Debtors**” and each respectively a “**Debtor**”), pursuant to a receivership of the Court of King’s Bench of Alberta (the “**Receivership Order**”) dated October 15, 2024 (the “**Receivership Date**”).
2. In this Application, the Receiver seeks from this Honourable Court:
 - a. An Order substantially in the form attached hereto as Schedule “A”, which seeks, among other things, orders:
 - i. Approving the Proposed Sales Process (the “**SISP**”) with respect to the Property, assets, or business of the Debtors, as set out in the First Report.
 - ii. Approving the Property Claim Process as set out in the First Report.
 - iii. Approving the Receiver’s activities since the Receivership Date as set out in the First Report of the Receiver, dated July 15, 2025 (the “**First Report**”);
 - iv. Approving the professional fees and disbursements of the Receiver and the Receiver’s legal counsel, Stikeman Elliott LLP, as set out in the First Report, without the necessity of a formal passing of their accounts;
 - b. Such further and other relief as this Honourable Court deems just and appropriate.

Grounds for making this application:

Approval of SISP

3. The Receiver was appointed as the receiver and manager of the Debtors, pursuant to the Receivership Order. The Receivership Order provides, *inter alia*, that the Receiver is expressly empowered and authorized to:

- a. Take possession of and exercise control of the Property;
 - b. Market any or all of the Property, including advertising and soliciting offers in respect of the Property;
 - c. Sell, convey, transfer, lease, or assign the Property or any part or parts thereof out of the ordinary course of business, subject to the approval of this Honourable Court for any transactions exceeding \$50,000 or the aggregate of multiple transactions exceeding \$125,000;
 - d. engage consultants, appraisers, agents, experts, auditors, accountants, managers, counsel and such other persons from time to time and on whatever basis, to assist the exercise of the Receiver's powers and duties.
4. The Receiver has prepared a SISP, attached as an Appendix to the First Report.
 5. The Receiver considers that the form of SISP proposed is fair, reasonable, and appropriate in the circumstances.
 6. The proposed SISP is expressly or impliedly contemplated by the Receivership Order.

Approval of Property Claim Process

7. The Receiver has prepared a Property Claim Process to adjudicate third-party property claims.
8. The Receiver submits that the form of Property Claim Process proposed is fair, reasonable, and appropriate in the circumstances.

Approval of Actions, Activities, Conduct, and Fees

9. The activities of the Receiver and its legal counsel are described in detail in the First Report filed in this proceeding.
10. The Receiver submits that its actions, activities, conduct, fees, and disbursements, and those of its legal counsel were appropriate and necessary for the administration of the receivership and ought to be approved by this Honourable Court.

Material or evidence to be relied on:

11. The Receiver's First Report, filed herewith.

12. The pleadings, affidavits, and other materials previously filed in these proceedings.
13. Such further and other evidence or material as counsel may advise and this Honourable Court may permit.

Applicable Rules:

14. Alberta Rules of Court, Alta Reg 124/2010.

Applicable Acts and Regulations:

15. *Judicature Act*, RSA 2000, c J-2.
16. *Business Corporations Act*, RSA 2000, c B-9.
17. *Personal Property Security Act*, RSA 2000, c P-7.

Any irregularity complained of or objection relied on:

18. None.

How the application is proposed to be heard or considered:

19. Via WebEx on the Commercial List.

WARNING

If you do not come to Court either in person or by your lawyer, the Court may give the applicant(s) what they want in your absence. You will be bound by any order that the Court makes. If you want to take part in this application, you or your lawyer must attend in Court on the date and at the time shown at the beginning of the form. If you intend to give evidence in response to the application, you must reply by filing an affidavit or other evidence with the Court and serving a copy of that affidavit or other evidence on the applicant(s) a reasonable time before the application is to be heard or considered.

SCHEDULE "A"

COURT FILE NUMBER	2203-18590	Clerk's stamp
COURT	COURT OF KING'S BENCH OF ALBERTA	
JUDICIAL CENTRE	EDMONTON	
PLAINTIFF/DEFENDANT BY COUNTERCLAIM	1823741 ALBERTA LTD.	
DEFENDANT BY COUNTERCLAIM	MICHAEL JAMES GANSER	
DEFENDANT/PLAINTIFF BY COUNTERCLAIM	MARK EDMUND HALDANE	
APPLICANT	BDO CANADA LIMITED	
DOCUMENT	ORDER (APPROVING SALE AND INVESTMENT SOLICITATION PROCESS, PROPERTY CLAIM PROCESS, FEES AND ACTIVITIES OF RECEIVER)	
ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	STIKEMAN ELLIOTT LLP Barristers & Solicitors 4200 Bankers Hall West 888-3rd Street SW Calgary, AB T2P 5C5 Karen Fellowes, K.C. / Isis R. Tse Tel: (403) 724-9469 / (403) 724-9488 Fax: (403) 266-9034 Email: kfellowes@stikeman.com / itse@stikeman.com File No.: 155857.1002	

DATE ON WHICH ORDER WAS PRONOUNCED:

LOCATION WHERE ORDER WAS PRONOUNCED: Edmonton, Alberta

JUSTICE WHO MADE THIS ORDER: The Honourable Justice Lema

UPON the application of BDO Canada Limited (the "**Receiver**") as Court Appointed Receiver and Manager in respect of 1823741 Alberta Ltd. ("**182**") and 1872806 Alberta Ltd. ("**187**" and collectively with 182, the "**Debtors**"), **AND UPON** READING the First Report of the Receiver, filed (the "**First Report**"), **AND UPON** hearing counsel for the Receiver, **AND UPON** hearing counsel for Mark Haldane, and any other interested parties appearing at the application;

IT IS HEREBY ORDERED AND DECLARED THAT:

1. Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Order of Justice Lema dated October 15, 2024 (the "**Receivership Order**") granted in these proceedings.

SERVICE

2. The time for service of the notice of application for this order (the "**Order**") together with all supporting materials is hereby deemed good and sufficient and this application is properly returnable today.

APPROVAL OF SALE AND INVESTMENT SOLICITATION PROCESS

3. The Proposed Sales Process that has been proposed by the Receiver in respect of certain Property of the Debtors, as set out and described in the First Report (the "**SISP**"), is hereby approved.
4. The Receiver, the Debtors, and their advisors are authorized and directed to perform their respective obligations and to do all things reasonably necessary to perform their obligations under the SISP.

APPROVAL OF PROFESSIONAL FEES AND ACTIONS OF THE RECEIVER

5. The professional fees and disbursements of the Receiver and the Receiver's legal counsel, Stikeman Elliot LLP, as set out in the First Report, are hereby approved without the necessity of a formal passing of their accounts.
6. The Receiver's activities as set out in the Receiver's Report, and the Statement of Receipts and Disbursements as attached to the Receiver's Report, are hereby ratified and approved.

APPROVAL OF PROPERTY CLAIM PROCESS

7. The Property Claim Process as set out in the First Report (the "**Property Claim Process**") is hereby approved.
8. The Receiver, the Debtors, and their advisors are authorized and directed to perform their respective obligations and to do all things reasonably necessary to perform their obligations under the Property Claim Process.

MISCELLANEOUS

9. The Receiver is authorized to apply to this Honourable Court for advice and directions in connection with the SISP and the Property Claim Process.

10. This Order must be served only upon those interested parties attending or represented at the within Application. Service of this Order may be effected by facsimile, electronic mail, personal delivery, or courier. Service is deemed to be effected the next business day following transmission or delivery of this Order.

11. Service of this Order on any party not attending this Application is hereby dispensed with.

Justice of the Court of King's Bench of Alberta