

FILE NUMBER 2503 - 13640  
COURT COURT OF KING'S BENCH OF ALBERTA  
JUDICIAL CENTRE EDMONTON

IN THE MATTER OF THE COMPANIES'  
CREDITORS ARRANGEMENT ACT, RSC 1985,  
C-36, as amended

AND IN THE MATTER OF THE COMPROMISE OR  
ARRANGEMENT OF COAST AUTOMOTIVE  
GROUP INC., COAST NORTH VANCOUVER AUTO  
SALES INC., COAST AUTO DRAYTON INC. and  
2461765 ALBERTA LTD.



APPLICANT BDO CANADA LIMITED, IN ITS CAPACITY AS  
COURT-APPOINTED MONITOR OF COAST  
AUTOMOTIVE GROUP INC., COAST NORTH  
VANCOUVER AUTO SALES INC., COAST AUTO  
DRAYTON INC., AND 2461765 ALBERTA LTD.

DOCUMENT **APPLICATION (EXTENSION OF STAY PERIOD)**

ADDRESS FOR SERVICE AND  
CONTACT INFORMATION OF  
PARTY FILING THIS DOCUMENT

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File Ref: 103940/01

**NOTICE TO THE 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:** March 23, 2026  
**Time:** 1:00 p.m.  
**Where:** Edmonton Law Courts (via Webex, details attached at Appendix "A")  
**Before Whom:** The Honourable Justice J.S. Little

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**"), in its capacity as court-appointed Monitor (in such capacity, the "**Monitor**") for and on behalf of Coast Automotive Group Inc. ("**Coast Automotive**"),

Coast North Vancouver Auto Sales Inc. ("**Coast North Van**"), Coast Auto Drayton Inc. ("**Coast Drayton Valley**") and 2461765 Alberta Ltd. ("**246**", and together with Coast Automotive, Coast North Van and Coast Drayton Valley, the "**Coast Auto Group**"), seeks an order under the *Companies' Creditors Arrangement Act*, RSC 1985 c C-36, as amended (the "**CCAA**") substantially in the form attached hereto as **Schedule "A"** granting the following relief:

- (i) abridging the time for service of this Application and the supporting materials, if necessary, and deeming service to be good and sufficient;
- (ii) extending the Stay Period (as defined below) until the earlier of April 19, 2026, or the filing of the CCAA Termination Certificate (as defined below);
- (iii) such further and other relief as counsel may advise and this Honourable Court may permit.

#### **GROUND FOR MAKING THIS APPLICATION:**

##### CCAA Proceedings

2. Capitalized terms used herein but not otherwise defined have the meaning ascribed to them in the fourth report of the Monitor dated March 16, 2026 (the "**Fourth Report**").
3. On July 16, 2025, upon application by BMO, the Honourable Justice M.E. Burns of the Court of King's Bench of Alberta (the "**Court**") granted an initial order (the "**Initial Order**") pursuant to the CCAA. Among other things, pursuant to the Initial Order, the Court:
  - (a) granted an initial stay of proceedings in favour of the Coast Auto Group up to and including July 26, 2025 (the "**Stay Period**") to permit the Monitor to devise a proposed court-supervised sale and investment solicitation process ("**SISP**"); and
  - (b) appointed BDO as Monitor, with expanded powers, of the Coast Auto Group.
4. On July 25, 2025, the Honourable Justice M.H. Bourque granted an amended and restated initial order (the "**ARIO**"). Pursuant to the ARIO, among other things, the Court:
  - (c) extended the Stay Period until and including October 19, 2025; and
  - (d) further expanded the powers of the Monitor.

5. On the same day, the Court also granted an Order authorizing the Monitor and DSMA in its capacity as sales agent, to conduct the SISP.
6. On October 16, 2025, the Honourable Justice D.R. Mah granted:
  - (a) an approval and vesting order, among other things, approving and authorizing the sale transaction in respect of certain assets, undertakings and properties of Coast Drayton Valley and 246 (the “**Drayton Valley Transaction**”)
  - (b) an approval and vesting order, among other things, approving and authorizing the sale transaction of certain of the assets, undertakings and properties of Coast North Van (the “**North Van Transaction**”)
  - (c) an ancillary relief order, among other things:
    - (i) extending the Stay Period up to and including December 12, 2025; and
    - (ii) adjourning *sine die*, the approval of the Pre-Filing Report, the First Report, and the Second Report, and the actions, conduct, and activities of the Monitor set out therein.
7. On December 3, 2025, the Monitor brought an application returnable December 9, 2025 (the “**Application**”) seeking an order, among other things:
  - (a) extending the Stay Period from December 12, 2025, until and including January 30, 2026;
  - (b) terminating the CCAA Proceedings upon the filing of a certificate (the “**CCAA Termination Certificate**”) by the Monitor;
  - (c) approving the fees of the Monitor and of its legal counsel, Blake, Cassels & Graydon LLP; and
  - (d) approving the Reports, and the actions, conduct and activities of the Monitor set out therein.
8. On December 9, 2025, the Coast Auto Group and certain of its former principals and owners (the “**Founders**” and together with the Coast Auto Group, the “**Cross-Applicants**”) brought a cross-application (the “**Cross-Application**”) seeking certain relief, including an adjournment of the Application.

9. On December 9, 2025, the Court granted an Order (the “**Scheduling Order**”) extending the Stay Period to February 27, 2026, approving a final distribution to BMO, adjourning the balance of the relief sought in the Application and Cross-Application to February 18, 2026 and setting out a litigation timetable (the “**Litigation Timetable**”) in connection with the remainder of the relief sought in the Application and the Cross-Application.
10. On February 4, 2026, the Coast Auto Group, Sundeep Cheema and Deepak Parmar brought an urgent application (the “**Urgent Application**”) for an order (i) compelling the oral examination of Paul Clark Lonergan, a corporate representative of BDO Canada Limited, in its capacity as court-appointed Monitor of the Coast Group on the Third Report, or, in the alternative, compelling the Monitor to provide answers to certain questions by way of affidavit, (ii) ordering the re-attendance for cross examination of Mr. Lonergan, as a representative of the Monitor, concerning the Second Fee Affidavit, and (iii) varying the Scheduling Order such that the filing of briefs and the full day hearing be adjourned *sine die* and that the Urgent Application be heard during the full day hearing scheduled for February 18, 2026.
11. On February 6, 2026, BMO brought an application for an order, among other things, directing the Founders to post security for costs (the “**Security for Costs Application**”).
12. On February 6, 2026, the Court granted an Order (i) varying the Litigation Timetable, (ii) adjourning the Application and Cross-Application to a date to be set by the Court, (iii) setting dates and deadlines for the service of materials in relation to the Urgent Application, and (iv) scheduling the balance of the Urgent Application and Security for Costs Application to be heard on February 18, 2026.
13. On February 18, 2026, the Court heard the Urgent Application and Security for Costs Application.
14. Concurrently with the Urgent Application and the Security for Costs Application, the Court heard an application by the Monitor to extend the stay of proceedings to and including March 27, 2026. This order was granted by the Court on February 18, 2026.
15. On March 10, 2026, the Court released its decision on the Urgent Application and Security for Costs Application, dismissing the Urgent Application in its entirety and allowing the Security for Costs Application in the amount of \$100,000, to be posted by March 24, 2026.

16. The Court has reserved April 17, 2026 for a full day hearing of the Application and Cross Application.

**Stay Extension**

17. The Stay Period currently expires on March 27, 2026. As the return date for the Application and Cross-Application is not until April 17, 2026, the Monitor will not be in a position to terminate the CCAA proceedings before expiry of the Stay Period and a further extension of the Stay Period is required. The Monitor is requesting an extension of the Stay Period to the earlier of April 19, 2026 and filing of the CCAA Termination Certificate.
18. The extension of the Stay Period is supported by a cash flow forecast that is appended to the Fourth Report. In the Monitor's view, the Coast Auto Group under the supervision of the Monitor and through the exercise of the Monitor's expanded powers under the ARIO, has acted, and is acting, in good faith and with due diligence.

**Affidavits or other evidence to be used in support of this Application**

19. Fourth Report of the Monitor.
20. Such further and other material and evidence as counsel may advise and this Honourable Court permits.

**Applicable rules:**

21. *Alberta Rules of Court*, AR 124/2010.
22. *Bankruptcy and Insolvency General Rules*.

**Applicable Acts and regulations:**

23. *Companies' Creditors Arrangement Act*, RSC 1985, c C-36, as amended.
24. Such further and other Acts and Regulations as counsel may advise and this Honourable Court may permit.

**Any irregularity complained of or objection relied on:**

25. None.

**How the application is proposed to be heard or considered:**

26. Via Webex, on the Edmonton Commercial List before the Honourable Justice J.S. Little.

**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 rely on an affidavit or other evidence when the application is heard or considered, you must reply by giving reasonable notice of the material to the applicant.

## **Appendix “A”**

### **Webex Details**

**Virtual Courtroom 86** has been assigned for the above noted matter:

Virtual Courtroom Link: <https://albertacourts.webex.com/meet/virtual.courtroom86>

#### **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.

**Note: Recording or rebroadcasting of the video is prohibited.**

**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.

**Schedule "A"**

**Form of Order**

STAY EXTENSION ORDER

Clerk's Stamp

COURT FILE NUMBER 2503-13640

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE EDMONTON

MATTER 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 COAST AUTOMOTIVE GROUP INC., COAST NORTH VANCOUVER AUTO SALES INC., COAST AUTO DRAYTON INC., AND 2461765 ALBERTA LTD.

APPLICANT BDO CANADA LIMITED, IN ITS CAPACITY AS COURT-APPOINTED MONITOR OF COAST AUTOMOTIVE GROUP INC., COAST NORTH VANCOUVER AUTO SALES INC., COAST AUTO DRAYTON INC., AND 2461765 ALBERTA LTD.

DOCUMENT **ORDER (STAY EXTENSION)**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT BLAKE CASSELS & GRAYDON LLP  
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**DATE ON WHICH ORDER WAS PRONOUNCED:** March 23, 2026

**LOCATION WHERE ORDER WAS PRONOUNCED:** Edmonton Law Courts

**NAME OF JUSTICE WHO MADE THIS ORDER:** The Honourable Justice J.S. Little

**UPON** the application (the "**Application**") of BDO Canada Limited, in its capacity as court-appointed Monitor (in such capacity and not in its personal or corporate capacity, the "**Monitor**" or "**BDO**") of Coast Automotive Group Inc., Coast North Vancouver Auto Sales Inc. ("**Coast North Van**"), Coast Auto Drayton Inc. ("**Coast Drayton Valley**"), and 2461765 Alberta Ltd ("**246**", and collectively, the "**Coast Auto Group**");

**AND UPON** having read the Application, the initial order granted by the Honourable Justice M.E. Burns on July 16, 2025 (the “**Initial Order**”), as amended and restated by the order of the Honourable Justice M.H. Bourque granted on July 25, 2025 (the “**ARIO**”) and the fourth report of the Monitor dated March 16, 2026 (the “**Fourth Report**”);

**AND UPON** hearing counsel for the Monitor, counsel for the Bank of Montreal, and any other interested parties who may be present;

**IT IS HEREBY ORDERED AND DECLARED THAT:**

**SERVICE**

1. Service of notice of this application and supporting materials is hereby declared to be good and sufficient, no other person is required to have been served with notice of this application, and the application is properly returnable today.

**STAY EXTENSION**

2. The Stay Period, as ordered and defined in paragraph 13 of the ARIO, is extended to and including April 19, 2026.

**SERVICE OF ORDER**

3. Service of this Order may be effected by facsimile, electronic mail, personal delivery, courier or regular mail.

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Justice of the Court of King's Bench of  
Alberta