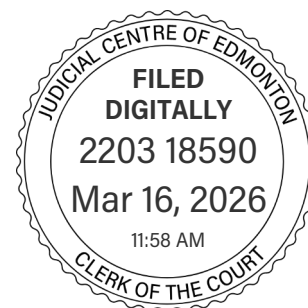


COURT FILE NUMBER 2203-18590
COURT COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE EDMONTON
PLAINTIFF/DEFENDANT BY COUNTERCLAIM 1823741 ALBERTA LTD.
DEFENDANT BY COUNTERCLAIM MICHAEL JAMES GANSER
DEFENDANT/PLAINTIFF BY COUNTERCLAIM MARK EDMUND HALDANE
APPLICANT BDO CANADA LIMITED

Clerk's stamp



DOCUMENT **APPLICATION FOR APPROVAL OF FEES AND ACTIVITIES OF RECEIVER AND ASSIGNMENT INTO BANKRUPTCY**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT Stikeman Elliott LLP
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File No.: 149533.1003

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: March 26, 2026
Time: 3:00 p.m. MST
Where: Edmonton Law Courts, via Webex -
<https://albertacourts.webex.com/meet/virtual.courtroom86>
Before Whom: The Honourable Justice 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**”) 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 Receiver’s activities as set out in the Third Report of the Receiver, dated March 16, 2026 (the “**Third Report**”);
 - ii. Approving the professional fees and disbursements of the Receiver and the Receiver’s legal counsel, Stikeman Elliott LLP, as set out in the Third Report, without the necessity of a formal passing of their accounts;
 - iii. Authorizing the Receiver to assign 182 into bankruptcy pursuant to s. 49 of the Bankruptcy and Insolvency Act (the “**BIA**”) and paragraphs 3(r) and 29 of the Receivership Order.
 - b. Such further and other relief as this Honourable Court deems just and appropriate.

Grounds for making this application:

Approval of Actions, Activities, Conduct, and Fees

3. The activities of the Receiver and its legal counsel are described in detail in the Third Report filed in this proceeding.
4. 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.

Assignment into Bankruptcy

5. Pursuant to paragraph 3(r) of the Receivership Order authorizes and empowers the Receiver to, with leave of the Court, assign the Debtors into bankruptcy and to act as the trustee in bankruptcy of the Debtors.
6. Paragraph 3(j) of the Receivership Order authorizes and empowers the Receiver to initiate any and all proceedings with respect to the Debtors and the Property.

7. Paragraph 3(s) further authorizes and empowers the Receiver to take any steps reasonably incidental to the exercise of these powers.
8. Paragraph 29 of the Receivership Order provides that nothing therein shall prevent BDO from acting as trustee in bankruptcy of the Debtors.
9. BDO is of the view, as outlined in more detail in the Third Report, that it is in the best interests of 182's creditors for it to be assigned into bankruptcy pursuant to the *BIA*.
10. Such further and other grounds as counsel for the Receiver may advise.

Material or evidence to be relied on:

11. The Receiver's Third Report, filed herewith.
12. The pleadings, affidavits, and other materials previously filed in these proceedings, including the Receivership Order.
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.
18. *Bankruptcy and Insolvency Act*, RSC 1985, c B-3.
19. *Bankruptcy and Insolvency General Rules*, CRC, c 368.

Any irregularity complained of or objection relied on:

20. None.

How the application is proposed to be heard or considered:

21. Via WebEx on the Commercial List - <https://albertacourts.webex.com/meet/virtual.courtroom86>

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 1823741 ALBERTA LTD.
BY
COUNTERCLAIM

DEFENDANT BY MICHAEL JAMES GANSER
COUNTERCLAIM

DEFENDANT/PLAINTIFF MARK EDMUND HALDANE
BY
COUNTERCLAIM

APPLICANT BDO CANADA LIMITED

DOCUMENT **ORDER (APPROVAL OF FEES AND ACTIVITIES OF RECEIVER,
ASSIGNMENT INTO BANKRUPTCY)**

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File No.: 149533-1003

DATE ON WHICH ORDER WAS PRONOUNCED: March 26, 2026

LOCATION WHERE ORDER WAS PRONOUNCED: Edmonton, Alberta

JUSTICE WHO MADE THIS ORDER: The Honourable Justice Little

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**") (the "**Receivership**"), which Receivership is conducted within the litigation proceedings in this Court Action (the "**Litigation**"), **AND UPON** READING the Third Report of the Receiver, filed (the "**Third 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:

SERVICE

1. 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 PROFESSIONAL FEES AND ACTIONS OF THE RECEIVER

2. The professional fees and disbursements of the Receiver and the Receiver's legal counsel, Stikeman Elliot LLP, as set out in the Third Report and the Third Affidavit of Kevin Meyler therein, are hereby approved without the necessity of a formal passing of their accounts.
3. The Receiver's activities as set out in the Third Report and the Statement of Receipts and Disbursements as attached to the Third Report, are hereby ratified and approved.
4. The approvals granted pursuant to paragraphs 2 and 3 of this Order are without prejudice to any rights of parties in the Litigation to claim against any other party or entity: judgment, allocation, or reimbursement of the costs of the Receivership, including the professional fees and disbursements of the Receiver and the Receiver's legal counsel.

ASSIGNMENT IN BANKRUPTCY

5. The Receiver is hereby authorized and directed to file an assignment in bankruptcy on behalf of 1823741 Alberta Ltd., pursuant to Section 49 of the *Bankruptcy and Insolvency Act*, RSC, 1985, c B-3.
6. If necessary, the stay of proceedings under Sections 8 and 9 of the Receivership Order granted in these proceedings on October 15, 2024, is hereby lifted for the limited purpose of allowing the Receiver to make the assignment contemplated by paragraph 5 hereof.
7. Upon 182's assignment in bankruptcy, BDO is hereby authorized and directed to act as the trustee in bankruptcy (the "**Trustee**") of 182.
8. The costs of and incidental to the bankruptcy proceedings of 182 shall be funded through the net surplus from the Receivership.

MISCELLANEOUS

9. Nothing in this Order shall prevent or limit the Receiver from exercising its powers and duties as Receiver.

10. The costs of and incidental to this Application are to be paid to the Receiver out of the assets of the bankrupt's estate on taxation, or upon further Order of this Court.
11. 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.
12. Service of this Order shall be deemed good and sufficient by posting a copy of this Order to the Receiver's Website at: <https://www.bdo.ca/services/financial-advisory-services/business-restructuring-turnaround-services/current-engagements/182and187>.
13. 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