

Clerk's Stamp:

COURT FILE NUMBER	2601-14248
COURT	COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE	CALGARY
PLAINTIFF	ROYAL BANK OF CANADA
DEFENDANTS	JAY'S METAL PRODUCTS LTD., JAY'S METAL STRUCTURAL LTD., JAY'S METAL STEEL FRAMING LTD., JAY'S METAL EDMONTON LTD., JAGJIT BAJWA, and RAJINDER SINGH
DOCUMENT	ORDER
ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	Field LLP 400, 444 – 7 Avenue SW Calgary AB T2P 0X8 Lawyer: Trevor Batty Phone Number: (403) 260-8537 Fax Number: (403) 264-7084 Email Address: tbatty@fieldlaw.com File No. 68029-6

DATE ON WHICH ORDER WAS PRONOUNCED:	Thursday, September 24, 2026
LOCATION WHERE ORDER WAS PRONOUNCED:	Calgary, Alberta
NAME OF JUSTICE WHO MADE THIS ORDER:	The Honourable Justice M. A. Marion

ORDER ADJOURNING RETURN APPLICATION

UPON THE APPLICATION of BDO CANADA LIMITED in its capacity as the Court-appointed receiver and manager (the "**Receiver**") of the undertaking, property and assets of Jay's Metal Products Ltd., Jay's Metal Structural Ltd., Jay's Metal Steel Framing Ltd. and Jay's Metal Edmonton Ltd. (the "**Debtors**"); AND UPON reviewing the Receivership Order, pronounced August 20, 2026 (the "**Receivership Order**"), the Order of the Honourable Justice M. A. Marion pronounced September 3, 2026 (the "**Compelling Order**"), the Order Declaring Non-Compliance, dated September 18, 2026 (the "**Non-Compliance Order**"), the Third Report of the Receiver dated September 23, 2026 (the "**Third Report**"), the Affidavits of Jagjit (Jay) Bajwa and Rajinder Singh (together "**Management**"), both sworn September 23, 2026, and the other materials filed or provided to me in person at the hearing of the Application;

AND UPON noting that paragraph 5 of the Non-Compliance Order required Management to separately swear and serve an affidavit containing the information and confirmations specified in that paragraph;

AND UPON hearing counsel for the Receiver, counsel for the Royal Bank of Canada and counsel for Management; AND UPON being satisfied that it is appropriate to do so, IT IS HEREBY ORDERED AND DECLARED THAT:

SERVICE, NON-COMPLIANCE AND FURTHER COMPLIANCE

1. Service of notice of this application and supporting materials, including personal service on Management, is hereby declared to be good and sufficient, and no other person is required to have been served with notice of this application, and time for service of this application is abridged to that actually given.
2. Management has not complied with paragraph 5 of the Non-Compliance Order.
3. Each member of Management shall comply fully with paragraph 5 of the Non-Compliance Order by no later than 4:00 p.m. on Monday, September 28, 2026 (the “**Further Compliance Deadline**”), including by separately swearing and serving an affidavit that:
 - (a) responds paragraph by paragraph to Schedule “A” to the Non-Compliance Order;
 - (b) identifies all materials, devices, credentials and information delivered;
 - (c) identifies every responsive item not delivered, its last known location and custodian, and all steps taken to obtain it;
 - (d) explains any alleged inability to comply and exhibits supporting documents; and
 - (e) confirms that no responsive property or data has been deleted, altered, destroyed, transferred, concealed, encrypted, withheld or impaired.
4. Compliance with paragraph 3 of this Order is in addition to, and does not limit or relieve Management from, any other continuing obligation under the Receivership Order, the Compelling Order or the Non-Compliance Order.

ADJOURNMENT AND PERSONAL ATTENDANCE

5. The Return Application is adjourned to Thursday, October 15, 2026 at 8:30 a.m. before the Honourable Justice M. A. Marion, both by Webex and in person (the “**Adjourned Return Application**”).
6. Jagjit (Jay) Bajwa and Rajinder Singh, also known as Raj Sunner, shall each attend personally at the Adjourned Return Application and shall remain in attendance until excused by the Court, to show cause why they should not be declared in civil contempt of the Compelling Order, the Non-Compliance Order and this Order, and why sanctions should not be imposed.

QUESTIONING OF MANAGEMENT

7. No examination or questioning under oath of Management by the Receiver or by BDO Canada Limited in its capacity as trustee in bankruptcy of Jay’s Metal Products Ltd., whether pursuant to paragraphs 7 to 14 of the Non-Compliance Order, subsection 163(1) of the *Bankruptcy and Insolvency Act*, RSC 1985, c B-3, or otherwise, shall occur before the Further Compliance Deadline.
8. For greater certainty, paragraph 7 of this Order does not otherwise vary, restrict or prejudice the examination and production powers granted or preserved by paragraphs 7 to 14 of the Non-Compliance Order after the Further Compliance Deadline.

COSTS AND CONTINUING EFFECT

9. All issues concerning entitlement to and quantum of costs, including the Receiver’s request for its costs and solicitor-and-client costs against Management, are adjourned to the Adjourned Return Application.
10. Except as expressly varied by this Order, the Compelling Order, the Non-Compliance Order and all prior Orders made in these proceedings remain in full force and effect.
11. The Receiver has liberty to apply on short notice for further advice and directions, enforcement relief, preservation relief or such other relief as may be necessary before the Adjourned Return Application.

12. Service of this Order on Management may be effected by email to their counsel of record and is deemed good and sufficient service. All other parties on the Service List may be served by email or by any other method permitted by the Service List.



J.C.K.B.A.

APPROVED AS TO FORM AND CONTENT THIS 25th DAY OF SEPTEMBER, 2026

SCOTT VENTURO RUDAKOFF LLP



Lukas Frey

Counsel for Jagjit Bajwa and Rajinder Singh