

COURT FILE NUMBER 2203-18590

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 (APPROVING AUCTION, PROPOSED DISTRIBUTION, AND FEES AND ACTIVITIES OF RECEIVER)**

ADDRESS FOR SERVICE **STIKEMAN ELLIOTT LLP**
AND CONTACT Barristers & Solicitors
INFORMATION OF 4200 Bankers Hall West
PARTY FILING 888-3rd Street SW
THIS DOCUMENT 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.: 149533-1003

Clerk's stamp



KMP Ent

DATE ON WHICH ORDER WAS PRONOUNCED: November 4, 2025

LOCATION WHERE ORDER WAS PRONOUNCED: Edmonton, Alberta

JUSTICE WHO MADE THIS ORDER: The Honourable Justice Neilson

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 Second Report of the Receiver, filed (the “**Second Report**”) and the Confidential Supplement to the Second Report (the “**Confidential**”

Supplement”), **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.

AUCTION

2. The Auction Agreement between the Receiver and McDougall Auctioneers Ltd. (the "**Auctioneer**"), as set out in the Second Report, is approved.
3. The Auctioneer is authorized to conduct the auction in accordance with the terms of the Auction Agreement.

PROPOSED DISTRIBUTION

4. The Receiver is authorized to make distributions to the Business Development Bank of Canada ("**BDC**") up to the maximum amount of BDC's proven claim, including the interim distribution to BDC set out in the Proposed Distribution in the Second Report, and any further distributions to BDC as may be necessary to satisfy BDC's proven claim.

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 Second Report and the Second Affidavit of Kevin Meyler therein, are hereby approved without the necessity of a formal passing of their accounts.
6. The Receiver's activities as set out in the Second Report and the Statement of Receipts and Disbursements as attached to the Second Report, are hereby ratified and approved.
7. The approvals granted pursuant to paragraphs 5 and 6 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.

MISCELLANEOUS

8. 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.
9. 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