

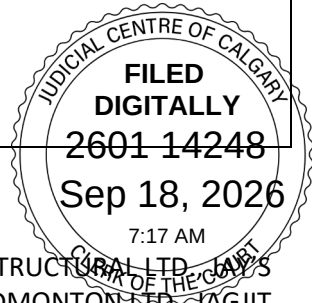
CERTIFIED

by the Court Clerk as a true copy
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Sep 18, 2026

Wayne Ligne

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

Clerk's Stamp:



DATE ON WHICH ORDER WAS PRONOUNCED:	Thursday, September 3, 2026
LOCATION WHERE ORDER WAS PRONOUNCED:	Calgary, Alberta
NAME OF JUSTICE WHO MADE THIS ORDER:	The Honourable Justice M. A. Marion

ORDER COMPELLING COMPLIANCE WITH RECEIVERSHIP ORDER

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 First Report of the Receiver, dated September 2, 2026 (the "**Receiver's First Report**"); AND UPON hearing counsel for the Receiver, counsel for the Royal Bank of Canada and counsel for other interested parties; AND UPON being satisfied that it is appropriate to do so, IT IS HEREBY ORDERED AND DECLARED THAT:

SERVICE AND DEFINITIONS

1. Service of notice of this application and supporting materials 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. In this Order, “**Management**” means Jagjit (Jay) Bajwa and Raj Singh (aka Raj Sunner), together with any other current or former director, officer, employee, agent or representative of a Debtor who has possession or control of, or knowledge concerning, the Debtors’ property, books, records or affairs and receives notice of this Order.

APPROVAL OF RECEIVER’S ACTIVITIES

3. The Receiver’s actions, activities and conduct as set out in the Receiver’s First Report are hereby approved.

COMPLIANCE WITH RECEIVERSHIP ORDER

4. The Debtors and Management have not fully complied with paragraphs 4, 5 and 6 of the Receivership Order.
5. The Debtors and Management shall comply immediately and fully with paragraphs 4, 5 and 6 of the Receivership Order and with all reasonable requests and directions of the Receiver made pursuant to the Receivership Order.
6. The Debtors and Management shall deliver to the Receiver, in complete, usable and unaltered form, all electronic and hard-copy books and records of the Debtors in their possession or control, including accounting records, banking records, contracts, purchase orders, work orders, invoices, delivery records, payroll records, tax records, emails, electronic files, correspondence, corporate records and records stored on personal or business devices or accounts. The Debtors and Management shall use best efforts to provide as many of these books and records as possible to the Receiver on September 4, 2026, and will then provide the balance of the books and records by no later than 4 :00 p.m. on September 9, 2026.

7. By no later than 4:00 p.m. on September 4, 2026, the Debtors and Management shall provide to the Receiver a complete written list of: (a) all customers and creditors, with names, telephone numbers, email addresses and other available contact information; (b) all current and former employees, with contact information, start dates, termination information, payroll amounts outstanding and a payroll subledger; (c) every person or entity that has possession of or access to the Debtors' books and records, including contact information for such individual (phone number, email address and physical address); and (d) every person or entity that administered the Debtors' accounting systems, email, servers, cloud storage, websites or other electronic records.
8. Management shall meet with the Receiver at 10:00 a.m. MDT, on September 4, 2026, at 1324 36 Ave NE, Calgary, Alberta, to provide the Receiver with all records and reasonable assistance required to identify: (a) customer orders that have been completed, partially completed or not started and the status of such order; (b) goods that are capable of delivery; (c) valid and collectible accounts receivable; (d) work in progress and finished goods; and (e) amounts received, credited, disputed, unbilled or written off.
9. By no later than 4:00 p.m. on September 9, 2026, the Debtors and Management shall provide a complete inventory and asset list stating the description, location and custodian of all inventory, finished goods, raw materials, equipment, vehicles, bank accounts, investments and other property of each Debtor, together with available keys, access codes, lease records and contact information for every person in possession of such property.
10. The disclosure required by paragraph 6 shall include, without limitation, all property and records located at or relating to 6039, 46 Street SE, Calgary, Alberta and 6771, 84 Street SE, Calgary, Alberta, and every other warehouse, storage facility, worksite or premises used by a Debtor.
11. By no later than 4:00 p.m. on September 9, 2026, the Debtors and Management shall provide copies of bank statements for all bank accounts used by the Debtors, including third party supporting documentation indicating the source of deposits, or recipients of funds, for a minimum period of January 1, 2025 to date.

12. By no later than 4:00 p.m. on September 9, 2026, the Debtors and Management shall provide a list of every disposition of property exceeding \$5,000 by any Debtor during the 12 months preceding August 20, 2026, identifying the property, date, purchaser or transferee, consideration, payment details and present location, together with all supporting documents.
13. By no later than 4:00 p.m. on September 9, 2026, the Debtors and Management shall deliver all computers, mobile devices, storage media and other equipment owned by or used for the business of a Debtor, with all passwords, credentials, multifactor-authentication access, encryption keys and administrator information necessary to access and preserve the data, and without deletion or alteration of any data.
14. Jagjit (Jay) Bajwa and Raj Singh (aka Raj Sunner) shall attend for meetings with the Receiver at the times and places reasonably specified by the Receiver, to answer all proper questions concerning the Debtors' business, property and affairs, identify and explain the records delivered, and provide reasonable assistance to the Receiver in preserving, completing, delivering and monetizing customer orders and collecting receivables.
15. No Debtor, Management personnel or person with notice of this Order shall delete, alter, destroy, transfer, conceal, encrypt, withhold or impair any property, book, record, data, device, password or credential of a Debtor.

RECEIVER'S ACCESS AND PRESERVATION POWERS

16. The Receiver is authorized to take all steps reasonably necessary to obtain, preserve, image, copy and secure the Debtors' electronic and hard-copy books, records and devices from the Debtors, Management and third-party custodians, and this authority is in addition to and does not limit the powers granted under the Receivership Order.
17. Any person served with this Order who possesses or controls books, records, data, credentials, devices or property of a Debtor shall preserve them intact and shall promptly advise the Receiver of their existence and location.

COSTS, ENFORCEMENT AND LIBERTY TO APPLY

18. The Receiver shall have its costs of this Application on a solicitor-and-client basis, payable by Jagjit (Jay) Bajwa and Raj Singh (aka Raj Sunner) jointly and severally, payable forthwith in an amount to be agreed, and if not agreed, in an amount assessable by the Assessment Officer.
19. The Receiver has liberty to apply on short notice for further advice and directions and for any further enforcement or contempt relief arising from non-compliance with the Receivership Order or this Order.
20. Service of this Order may be effected by serving the Service List established in these proceedings by email, personal service, courier, or any other means set out in the Service List, and service by any such means is deemed good and sufficient.
21. Any interested party may apply to this Court to vary or amend this Order on not less than 7 days' notice to the Receiver and to any other party likely to be affected by the order sought or upon such other notice, if any, as this Court may order.



J.C.K.B.A.