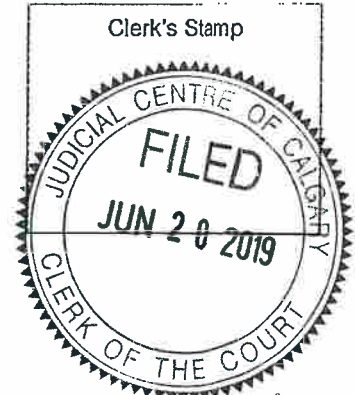


COURT FILE NUMBER 1801-16809
 COURT COURT OF QUEEN'S BENCH OF ALBERTA
 JUDICIAL CENTRE CALGARY
 APPLICANT ROBERT KULHAWY
 RESPONDENTS COMMERX HOLDINGS LLC and LOTUS INNOVATIONS PRIVATE EQUITY FUND also known as LOTUS INNOVATIONS LLC and COMMERX CORPORATION



DOCUMENT CONSENT ORDER

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
 Burstall LLP
 Barristers & Solicitors
 1600, 333 – 7 Avenue SW
 Calgary, AB T2P 2Z1

I hereby certify this to be a true copy of the original Consent Order
 Dated this 20 day of June 2019
 [Signature]
 for Clerk of the Court

Justin Fogarty, counsel for the Applicant, Robert Kulhawy
 Telephone: (403) 999-9817
 Fax: (403) 266-6016
 Email: Fogarty@burstall.com

DATE ON WHICH ORDER WAS PRONOUNCED: June 19, 2019
 LOCATION AT WHICH ORDER WAS MADE: Calgary, Alberta
 NAME OF JUSTICE WHO MADE THIS ORDER: Madam Justice C. Dario


ON THE APPLICATION of the Applicant, Robert Kulhawy ("Kulhawy") filed June 17, 2019; AND UPON reviewing the Affidavit of Robert Kulhawy filed June 17, 2019, and the third report of the Proposal Trustee; AND ON NOTING THE CONSENT OF counsel for the Respondents, Commerx Holdings LLC and Lotus Innovations Private Equity Fund also known as Lotus Innovations LLC.

IT IS HEREBY ORDERED THAT:

- Pursuant to s. 50.4(9) of the Bankruptcy and Insolvency Act, the time to file a proposal by Commerx Corporation is extended for a period of 45 days from July 4, 2019 up to and including August 18, 2019.
- The stay of proceedings shall be extended up to and including August 18, 2019.
- The balance of the Plaintiff's application is adjourned to the date of application set per para 2.(7) of this order 2019. *cc*
- The parties to this Litigation Plan have contemplated the Rules under Part 4 of the Alberta Rules of Court and, in particular, Rule 4.1 regarding the responsibility of the parties for managing this dispute and for planning its resolution in a timely and cost-effective way. *TN*
- The parties have agreed that this is a standard case.

6. The parties agree that this Litigation Plan may be consented to in counterpart and transmitted via facsimile or other electronic format.
7. The parties to this Litigation Plan agree that changes to this Litigation Plan may be made by the mutual agreement of the parties in writing, without further Court Order.
8. The parties agree as follows:

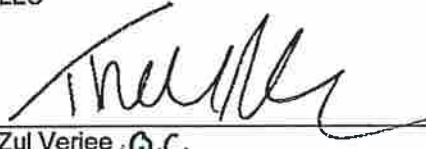
	STEP IN THE ACTION	DEADLINE TO COMPLETE STEP
1.	Cross-examination of the Applicant, Robert Kulhawy	July 15, 2019
2.	Undertaking responses of Robert Kulhawy to be provided to the Respondent, Lotus Innovations LLC	July 19, 2019
3.	Service of the Response Affidavit of the Respondent, Lotus Innovations LLC	July 23, 2019
4.	Cross-examination of the Respondent, Lotus Innovations LLC	July 26, 2019
5.	Service of the Applicant's Brief	July 31, 2019
6.	Service of the Respondent's Brief	August 7, 2019
7.	Scheduling of Application dates	To be set down for August 20, 21, or 22, 2019 the earliest date available


 J..C.Q.B.A.

CONSENTED TO this 19th day of June, 2018
 Legal Counsel for the Applicant, Robert
 Kulhawy


 FOR: Justin Fogarty
 Burstall LLP, Barristers and Solicitors

CONSENTED TO this 19th day of June, 2019
 Legal Counsel for the Respondents, Commerx
 Holdings LLC and Lotus Innovations Private
 Equity Fund also known as Lotus Innovations
 LLC


 FOR: Zul Verjee, Q.C.
 Verjee and Associates