

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

**IN THE MATTER OF THE COMPANIES' CREDITORS
ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF EARTH BORING CO. LIMITED,
YARBRIDGE HOLDINGS INC., TROLAN INVESTMENTS LTD.
AND YARFIELD SERVICES LIMITED**

**AIDE MEMOIRE OF THE APPLICANTS
(Comeback Hearing - April 24, 2025)**

April 23, 2025

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TO: THE SERVICE LIST

1. The Applicants sought and obtained an initial order (the “**Initial Order**”) pursuant to the *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the “**CCAA**”) on April 17, 2025, which directed that the comeback hearing proceed on April 24, 2025 at 9:30am.
2. The Court also granted a Lien Regularization Order (the “**LRO**”) on April 17, 2025.
3. The Applicants’ Application Record and Factum for the hearing on April 17, 2025 also spoke to further relief that would be sought at the comeback, including a form of Amended and Restated Initial Order (the “**ARIO**”) substantially in the form of the model order containing provisions that are not customarily included in a day one Initial Order and increased amounts for the Administration Charge, the DIP Lender’s Charge, and the Director’s Charge relative to what was granted in the Initial Order (each as defined in the Initial Order).
4. Since the granting of the Initial Order and the LRO, the Applicants have been in communication with their stakeholders, including providing letters to the various constituencies among the stakeholders, all as detailed in the further affidavit of Eugene Woodbridge sworn April 23, 2025.
5. The Applicants are unaware of any opposition to the relief sought in the ARIO.
6. The Applicants accordingly rely on their Application Record and Factum already filed in support of the ARIO.

ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS 23rd DAY OF APRIL, 2025



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Court File No. CV-25-00741419-00CL

AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF EARTH BORING CO. LIMITED ET AL.

**ONTARIO
SUPERIOR COURT OF JUSTICE
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Proceedings commenced at *Toronto*

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