



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 **SEALING ORDER**

ADDRESS FOR **STIKEMAN ELLIOTT LLP**  
SERVICE AND 4200 Bankers Hall West  
CONTACT 888 – 3<sup>rd</sup> Street S.W.  
INFORMATION OF Calgary, AB T2P 5C5  
PARTY FILING THIS  
DOCUMENT

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

**Counsel for the Applicant BDO Canada Limited**

**DATE ON WHICH ORDER WAS PRONOUNCED:** November 4, 2025

**NAME OF JUDGE WHO MADE THIS ORDER:** The Hon. Justice Neilson

**LOCATION OF HEARING:** Edmonton, Alberta via Webex

**UPON THE APPLICATION** BDO Canada Limited (the "**Applicant**" or "**BDO**"); **AND UPON** reading the Application of BDO, the Second Report of BDO in its capacity as Receiver of 1823741 Alberta Ltd. and 1872806 Alberta Ltd. (in such capacity, the "**Receiver**") (the "**Second Report**") and the Confidential Supplement to the Second Report (the "**Confidential Supplement**");

**AND UPON** hearing the submissions of counsel for the Applicant and any other parties present:

**IT IS HEREBY ORDERED AND DECLARED THAT:**

1. Service of notice of this Application and supporting materials (the “**Application**”) is hereby declared to be good and sufficient, 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. The Confidential Supplement shall be sealed on the Court file and shall not form part of the public record, notwithstanding Division 4, Part 6 of the Alberta *Rules of Court*, until the filing of a Receiver’s Certificate confirming the closing of the Transaction contemplated in the Asset Purchase Agreement between the Applicant and 2211824 Alberta Ltd. and 1578646 Alberta Ltd (collectively, the “**Purchasers**”) and the Auction contemplated in the Auction Agreement (as defined and attached to the Second Report and Confidential Supplement).
3. The Clerk of this Honourable Court shall file the Confidential Supplement in a sealed envelope attached to a notice that sets out the style of cause in these proceedings and states that:

THIS ENVELOPE CONTAINS CONFIDENTIAL MATERIALS FILED BY  
BDO CANADA LIMITED THE CONFIDENTIAL MATERIALS ARE  
SEALED PURSUANT TO THE SEALING ORDER ISSUED BY THE HON.  
JUSTICE NEILSON ON NOVEMBER 4, 2025.

4. Service of this Order shall be deemed good and sufficient by:
  - (a) serving the same on:
    - (i) the persons listed on the service list created in these proceedings;
    - (ii) any other person served with notice of the Application for this Order;
    - (iii) any other parties attending or represented at the Application for this Order;
    - (iv) the Purchaser or the Purchaser’s solicitors; and
  - (b) posting a copy of this Order on the Receiver's website at:

<https://www.bdo.ca/182and187>

and service on any other person is hereby dispensed with.

5. 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.

*James S. Neilson*

---

Justice of the Court of King's Bench of Alberta