

File No. CI 24-01-46529

**THE KING'S BENCH
WINNIPEG CENTRE**

**IN THE MATTER OF: THE APPOINTMENT OF A RECEIVER
PURSUANT TO SECTION 243 OF THE
BANKRUPTCY AND INSOLVENCY ACT, RSC 1985, c
B-3, AS AMENDED AND SECTION 55 OF *THE
COURT OF KING'S BENCH ACT*, CCSM c C280**

BETWEEN:

THE ROYAL BANK OF CANADA,

Applicant,

- and -

**PADM GROUP INC., PADM MEDICAL INC., and ROSWELL DOWNHOLE
TECHNOLOGIES INC.**

Respondents.

**NOTICE OF MOTION (ORDER FOR DISTRIBUTION AND DISCHARGE)
DATE OF HEARING: TUESDAY, NOVEMBER 25, 2025 AT 10:00 A.M.
CHARTIER, J.**

TAYLOR McCAFFREY LLP
Barristers and Solicitors
2200 – 201 Portage Avenue
Winnipeg, Manitoba, R3B 3L3

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Client File No. 46727-17

**THE KING'S BENCH
WINNIPEG CENTRE**

IN THE MATTER OF: THE APPOINTMENT OF A RECEIVER PURSUANT
TO SECTION 243 OF THE *BANKRUPTCY AND
INSOLVENCY ACT*, RSC 1985, c B-3, AS AMENDED
AND SECTION 55 OF *THE COURT OF KING'S
BENCH ACT*, CCSM c C280

BETWEEN:

THE ROYAL BANK OF CANADA,

Applicant,

- and -

PADM GROUP INC., PADM MEDICAL INC., and ROSWELL DOWNHOLE
TECHNOLOGIES INC.

Respondents.

NOTICE OF MOTION

BDO Canada Limited, the court-appointed receiver (the "**Receiver**") of all of the assets, undertakings and properties of PADM Group Inc. ("**PADM Group**"), PADM Medical Inc. ("**PADM Medical**"), and Roswell Downhole Technologies Inc. ("**Roswell**", and collectively with PADM Group and PADM Medical, the "**Debtors**"), relating to, acquired for, or used in relation to a business carried on by the Debtors, including all proceeds thereof (collectively, the "**Property**"), will make a motion before the Honourable Mr. Justice Chartier on Tuesday, the 25th day of November, 2025 at 10 o'clock in the forenoon or so soon after that time as the motion can be heard at the Law Courts Building, 408 York Avenue, Winnipeg, Manitoba.

THE MOTION IS FOR

1. A Distribution and Discharge Order, substantially in the form attached hereto as Schedule "A" (the "**Distribution and Discharge Order**") including, *inter alia*:

- a) Abridging time for service of or alternatively validating and/or dispensing with service of this Notice of Motion and the materials related thereto such that the motion is properly returnable November 25, 2025 and dispenses with further service thereof;
- b) Authorizing and directing the Receiver to make the Proposed Distributions as set out in the Third Report of the Receiver, to be filed (the "**Third Report**");
- c) Approving the First Report of the Receiver dated September 19, 2024 (the "**First Report**"), the Second Report of the Receiver dated November 7, 2024 (the "**Second Report**") and the Third Report and the activities described therein including the Statement of Receipts and Disbursements for the period of May 23, 2024 to November 17, 2025;
- d) Approval of the retention of the Diamond Bar Deposit;
- e) Approval of the Receiver's Holdback to complete the within Motion and finalize the receivership proceedings;
- f) Approval of the payment of any amounts remaining from the Receiver's Holdback to RBC and BDC on account of their respective security interests, and in the same proportionate allocations as detailed in the Proposed Distribution, up to the value of the RBC Indebtedness and the BDC Indebtedness;
- g) Approval of the fees and disbursements of the Receiver and its legal counsel as detailed in the First Report, the Second Report, and the Third Report;
- h) Discharging the Receiver upon filing of the Receiver's Discharge Certificate; and
- i) Such further and other relief as this Honourable Court may deem just.

THE GROUNDS FOR THE MOTION ARE:

1. *King's Bench Rules* 1.04(1), 2.01(1), 2.03, 3.02(1), 16.04(1), 16.08, 37, 37.08(2), 39 and 41.
2. *The Court of King's Bench Act*, CCSM c. C280 s. 55.
3. *Bankruptcy and Insolvency Act*, RSC c.B3 as amended ("BIA") s. 243.
4. *The Corporations Act*, CCSM c.C255 s. 95.
5. *The Personal Property Security Act*, CCSM c.P35 ("PPSA") ss. 63 and 64.

Background

6. By Order (Appointing Receiver) dated May 23, 2024 (the “**Receivership Order**”), this Court appointed BDO Canada Limited as Receiver of all the Property of the Debtors and, *inter alia*, authorized the Receiver to sell the Property or any part or parts thereof with the approval of this Honourable Court.
7. Following its appointment the Receiver carried out its duties in accordance with the Receivership Order including, *inter alia*, endeavoring to take possession and control of all the Property.
8. During the course of exercising its duties as Receiver, the Receiver conducted sales of the Property of the Debtors and all of the Property is now sold.

Abridging and/or Validating Service

9. Service under these receivership proceedings has been in compliance with the rules and the Receivership Order. To the extent that there may be deficiencies in service, the notice provided has been sufficient to bring these proceedings to the attention of the recipients and it is appropriate in the circumstances for this Honourable Court to validate service.

Approval of the Retention of the Diamond Bar Deposit

10. In accordance with the Sale Approval and Vesting Order dated November 12, 2024 (the “SAVO”) certain assets of PADM Medical and Roswell were sold.

11. As detailed in the Third Report, Diamond Bar C Syndicate Ltd. (“**Diamond Bar**”) was one of the parties who expressed an interest in the aforementioned assets and provided a deposit pursuant to the terms of the Sales Process. However, Diamond Bar walked away from the opportunity after its due diligence.

12. As a result, the Receiver believes the Diamond Bar deposit has been forfeited in accordance with terms of the September 16, 2024 binding Letter of Intent, and accordingly, the deposit has been included in the Proposed Distribution schedule.

Approval of the Receiver's First Report, Second Report, Third Report, and Activities

13. An Order approving the activities of the Receiver, and the fees and disbursements of the Receiver and the Receiver’s counsel to date is necessary, appropriate and in accordance with standard practice of the Court in court-supervised receivership proceedings.

Distribution and Conditional Discharge of the Receiver

14. All of the Property has been sold and it is appropriate to make a distribution of the net sale proceeds.

15. The Receiver has also substantially completed its duties under the Receivership Order save and except the following matters:

- a) Completion of the Proposed Distributions; and
- b) Administrative matters incidental to its discharge.

16. Once the Receiver has dealt with the above-noted outstanding conditions it will be appropriate for it to be discharged by this Court and released in accordance with the terms of the model Discharge Order.

17. Such further and other grounds as counsel may advise and this Honourable Court may permit.

THE FOLLOWING DOCUMENTARY EVIDENCE WILL BE USED AT
THE HEARING OF THE MOTION:

- 1. The First Report
- 2. The Second Report.
- 3. The Third Report.
- 4. The Affidavit of Service of Michaela Watson, to be filed.

5. Such further and other evidence as counsel may advise and this Honourable Court may permit.

November 18, 2024

TAYLOR McCAFFREY LLP
Barristers & Solicitors
2200 – 201 Portage Avenue
Winnipeg, Manitoba
R3B 3L3

CHARLES ROY

TO: THE SERVICE LIST (**Schedule B**)

THE KING'S BENCH
Winnipeg Centre

THE HONOURABLE) TUESDAY, THE 25TH
)
MR. JUSTICE CHARTIER) DAY OF NOVEMBER, 2025

B E T W E E N:

ROYAL BANK OF CANADA,

Applicant,

- and -

PADM GROUP INC., PADM MEDICAL INC., and ROSWELL DOWNHOLE
TECHNOLOGIES INC.

Respondents.

DISTRIBUTION AND DISCHARGE ORDER

THIS MOTION, made by BDO Canada Limited (“**BDO**”) in its capacity as the Court-Appointed Receiver (the “**Receiver**”) of the assets, undertakings and properties (the “**Property**”) of PADM Group Inc., PADM Medical Inc. and Roswell Downhole Technologies Inc. (collectively, the “**Debtors**”) for an order authorizing distribution of the net sales proceeds as described in the proposed Distribution Schedule attached as Appendix D to the Third Report of the Receiver dated November XX, 2025 (the “**Third Report**”), to be filed, discharging the Receiver and other relief, was heard this day at Winnipeg, Manitoba.

ON READING the First Report of the Receiver dated September 19, 2024 (the “**First Report**”), the Confidential Supplement to the First Report dated September 19, 2024 (the “**Confidential Report**”), the Second Report of the Receiver dated November 7, 2024 (the “**Second Report**”), the Confidential Supplement to the Second Report dated November 7, 2024 (the “**Second Confidential Report**”), the Third Report, and on hearing the submissions of counsel for the Receiver, counsel for the Applicant, counsel for the creditor, Business Development Bank of Canada, counsel for the creditors, Travelers Leasing Ltd. and Coast Capital Equipment Leasing Ltd., no one appearing for any other person on the service list, although properly served as appears from the Affidavit of Service of _____ affirmed November ___, 2025, filed:

SERVICE

1. THIS COURT ORDERS that the time for service of the Notice of Motion and the supporting materials is hereby abridged and validated so this motion is properly returnable today and hereby dispenses with further service thereof.

RETENTION OF THE DIAMOND BAR DEPOSIT

2. THIS COURT ORDERS AND DECLARES that, as detailed in the Third Report, the deposit provided by Diamond Bar C Syndicate Ltd. as part of the sales process for the sale of certain assets of PADM Medical Inc. and Roswell Downhole Technologies Inc. has been forfeited by Diamond Bar C Syndicate Ltd. and properly retained by the Receiver.

APPROVALS

3. THIS COURT ORDERS that activities of the Receiver, as set out in the First Report, the Second Report, and the Third Report are hereby approved, including the Statement of Receipts and Disbursements for the period of May 23, 2024 to November 17, 2025.

4. THIS COURT ORDERS that the fees and disbursements of the Receiver and its legal counsels, as set out in the First Report, Second Report, and Third Report, inclusive of the estimated fees and disbursements of the Receiver and its legal counsels, are hereby approved without the necessity of a formal passing of accounts.

DISTRIBUTION

5. THIS COURT ORDERS that the Receiver is authorized to maintain a holdback of \$100,000 (the “**Receiver’s Holdback**”) on account of further fees and disbursements of the Receiver and its legal counsel, and to apply from time to time the amounts so held back against such further fees and disbursements without the requirement of taxation or passing of accounts.

6. THIS COURT ORDERS that the Receiver is authorized and directed to pay from the net sales proceeds the Priority Distributions as set out in paragraph 45 of the Third Report, as follows:

- a) the WEPP Priority in the amount of \$57,491.31;
- b) the Pension Priority in the amount of \$39,828.98;
- c) Travelers Leasing Ltd. on account of its security in the amount of \$214,214.21;
- d) Coast Capital Equipment Leasing Ltd. on of its security in the amount of \$17,968.45;
- e) CWB National Leasing Inc. on account of its security in the amount of \$75,183.87;
- f) Royal Bank of Canada on account of its security in the amount of \$780,954.25;
- g) Business Development Bank of Canada on account of its security in the amount of \$267,520.46; and
- h) to the extent any surplus funds remain from the Receiver's Holdback after payment of the Receiver's obligations, including professional fees, such surplus may be paid to the Royal Bank of Canada and Business Development Bank of Canada in accordance with the proportionate allocations detailed in the Priority Distribution Schedule attached as Appendix D to the Third Report.

CONDITIONAL DISCHARGE

7. THIS COURT ORDERS that upon payment of the amount set out in paragraph 6 hereof and upon the Receiver filing a certificate substantially in the form attached hereto as Schedule A to this Order certifying that:

- a) The Receiver has completed the Priority Distributions as set out in the Third Report; and
- b) All other matters in the administration of the Debtors' estate have been completed, including but not limited to, the distribution of any residual funds from the Receiver's Holdback;

The Receiver shall be fully discharged as Receiver of the undertakings, property and assets of the Respondents, provided however that notwithstanding its full discharge herein:

- a) The Receiver shall remain Receiver for the performance of such incidental duties as may be required to complete the administration of the receivership herein, and
- b) The Receiver shall continue to have the benefit of the provisions of all Orders made in this proceeding, including all approvals, protections and stays of proceedings in favour of BDO in its capacity as Receiver.

8. THIS COURT ORDERS AND DECLARES that BDO is hereby released and discharged from any and all liability that BDO now has or may hereafter have by reason of, or in any way arising out of, the acts or omissions of BDO while acting in its capacity as Receiver herein, save and except for any gross negligence or wilful misconduct on the Receiver's part. Without limiting the generality of the foregoing, BDO is hereby forever released and discharged from any and all liability relating to matters that were raised, or which could have been raised, in the within receivership proceedings, save and except for any gross negligence or wilful misconduct on the Receiver's part.

9. THIS COURT ORDERS AND DECLARES that no action or other proceeding shall be commenced against the Receiver, including its officers, directors, employees, solicitors and agents and assigns in any way arising from or related to its capacity or conduct as Receiver, except with prior leave of this Court on notice to the Receiver, and upon such terms as this Court may direct.

MISCELLANEOUS MATTERS

10. THIS COURT HEREBY REQUESTS the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or in the United States to give effect to this Order and to assist the Receiver and its agents in carrying out the terms of this Order.

All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Receiver, as an officer of this Court, as may be necessary or desirable to give effect to this Order or to assist the Receiver and its agents in carrying out the terms of this Order.

11. THIS COURT ORDERS that this Order shall be served by email to all parties on the Service List, and any other party who appeared at the hearing of this motion, and further service is hereby dispensed with.

November 25, 2025

Justice Chartier

I, Charles Roy, of the firm of Taylor McCaffrey LLP, hereby certify that I have received the consents as to form of the following parties:

Royal Bank of Canada, as represented by Kalev A. Anniko at Fillmore Riley LLP

Business Development Bank of Canada, as represented by Richard W. Schwartz at Tapper Cuddy LLP

Orthopaedic Innovation Centre Inc., as represented by J.J. Burnell at MLT Aikins LLP

Travelers Leasing Ltd. and Coast Capital Equipment Leasing Ltd., as represented by Angad Bedi at Lawson Lundell LLP

as directed by the Honourable Mr. Justice Chartier.

Schedule A – Form of Receiver’s Certificate

File No. CI 24-01-46529

**THE KING'S BENCH
WINNIPEG CENTRE**

IN THE MATTER OF: **THE APPOINTMENT OF A RECEIVER
PURSUANT TO SECTION 243 OF THE
BANKRUPTCY AND INSOLVENCY ACT, RSC
1985, c B-3, AS AMENDED AND SECTION 55 OF
THE COURT OF KING'S BENCH ACT, CCSM c
C280**

BETWEEN:

ROYAL BANK OF CANADA,

Applicant,

- and -

**PADM GROUP INC., PADM MEDICAL INC., and ROSWELL DOWNHOLE TECHNOLOGIES
INC.**

Respondents.

RECEIVER’S DISCHARGE CERTIFICATE

RECITALS

- A. Pursuant to an Order of the Honourable Mr. Justice G.L. Chartier of the Manitoba Court of King's Bench (the "**Court**") dated May 23, 2024, BDO Canada Limited was appointed as the receiver (the "**Receiver**") of the undertaking, property and assets of the Respondents (the "**Debtors**");
- B. Pursuant to the Distribution and Discharge of this Court pronounced November 25, 2025 (the "**Distribution and Discharge Order**"), the Receiver has satisfied the conditions including having paid out any net realizations as directed by the Discharge Order and completed the administration of the Debtors’ estate;.
- C. Unless otherwise indicated herein, terms with initial capitals have the meanings set out in the Distribution and Discharge Order.

THE RECEIVER CERTIFIES the following:

1. The Receiver has paid the net sales proceeds in accordance with the Distribution and Discharge Order, and in particular, as set out in paragraph 45 of the Third Report.
2. The Receiver has completed the outstanding activities described in the Third Report and completed its administration of the Debtors' estate.

This Certificate was delivered by the Receiver at _____ [TIME] on _____ [DATE].

**BDO Canada Limited, in its capacity as
Receiver, without security, of all of the assets,
undertakings and properties of the Debtors,
and not in its personal capacity**

Per: _____

Name:

Title:

SCHEDULE "B"

THE SERVICE LIST AS OF January 13, 2025

<u>Party/Counsel</u>	<u>Telephone</u>	<u>Facsimile</u>	<u>Party Represented</u>
Fillmore Riley LLP 360 Main Street, suite 1700 Winnipeg, Manitoba R3C 3Z3 Kalev A. Anniko kanniko@fillmoreriley.com	204-957-8308	204-956-0308	Counsel for the Applicant, Royal Bank of Canada
BDO Canada Limited 201 Portage Avenue, 26th Floor Winnipeg MB R3B 3K6 Brent Warga bwarga@bdo.ca John Fritz jfritz@bdo.ca	204-220-3666 204-282-9716	1 833 888 1678	Proposed Receiver
Taylor McCaffrey LLP 2200-201 Portage Avenue Winnipeg, MB R3B 3L3 Charles Roy croy@tmlawyers.com	204-988-0472	204-953-7231	Counsel for the Proposed Receiver
Thompson Dorfman Sweatman 242 Hargrave St #1700, Winnipeg, MB R3C 0V1 Bruce Taylor gbt@tdslaw.com Melanie Labossiere mml@tdslaw.com	204-934-2566 204-934-2508	204- 934-0570	Counsel for the Respondents
Tapper Cuddy LLP 1000-330 St. Mary Avenue Winnipeg, MB R3C 3Z5 Richard W. Schwartz rschwartz@tappercuddy.com	204-944-3232	204-947-2593	Counsel for Business Development Bank of Canada, Secured Creditor

Party/Counsel	Telephone	Facsimile	Party Represented
The Cote Family Trust Suite 650, 211 – 11 th Avenue SW Calgary, AB T2R 0C6 Robert Stack rstack@wilcraft.com	403-476-0154		Secured Creditor
The Fiolka Family Trust Suite 650, 211 – 11 th Avenue SW Calgary, AB T2R 0C6 Robert Stack rstack@wilcraft.com	403-476-0154		Secured Creditor
The Sadie Capital Trust / The Sadie Family Trust Suite 650, 211 – 11 th Avenue SW Calgary, AB T2R 0C6 Robert Stack rstack@wilcraft.com	403-476-0154		Secured Creditor
Coast Capital Equipment Leasing Ltd. 800-9900 King George Blvd Surrey, BC V3T 0K7 cservice@coastcapitalsavings.com equipment@coastcapitalsavings.com	888- 517-7000		Secured Creditor
De Lage Landen Financial Services Canada Inc. 5046 Mainway, Unit 1 Burlington, ON L7L 5Z1 clientservices-ca@leasedirect.com corporate@dllgroup.com lossrecovery@leasedirect.com mluzy@leasedirect.com	877-523-5515		Secured Creditor

Party/Counsel	Telephone	Facsimile	Party Represented
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Orthopedic Innovation Centre Inc. Suite 320 1155 Concordia Avenue, Winnipeg, MB R2K 2M9 Trevor Gascoyne M.Sc., Eng, President and CEO tgascoyne@orthoinno.com	204-926-1290		Secured Creditor
Valiant Financial Services Inc. Ste 426 – 505 8840 210 Street Langley, BC V1M 2Y2 amallory@valiantfinancial.ca	833-635-3273	604-424-8507	Secured Creditor
CWB National Leasing 1525 Buffalo Place Winnipeg, Manitoba R3T 1L9 ppsa.adminstration@cwbnationalleasing.com debt enforcement@cwbnationalleasing.com	204 954 9000	866 814 4752	Secured creditor
Surrey National Verification and Collection Centre Canada Revenue Agency 9755 King George Boulevard Surrey, British Columbia V3T 5E1	866-891-7403	833-697-2389	His Majesty / CRA (Manitoba and Alberta)

Party/Counsel	Telephone	Facsimile	Party Represented
FIRST AMERICAN EQUIPMENT FINANCE 211 High Point Drive Victor, New York 14564 Alan Sikora – CEO alan.sikora@faef.com Bruce Masterson - general counsel Bruce.masterson@faef.com Thomas.Flint@faef.com Chris Wuest Senior Vice President, Asset Management Chris.Wuest@faef.com	 508-836-3270 585-643-3287 585-643-3270		Creditor
BENANTI & ASSOCIATES 350 Bedford Street, Suite 201 Stamford, Connecticut 06901 Paul A. De Genaro, Esq. pdegenaro@benantilaw.com	(203) 324-9559	(203) 358-8582	Counsel for First American Equipment Finance
EOS NORTH AMERICA 28970 Cabot Dr. – Suite#700 Novi, MI 48377 Mark Wright - CFO Mark.wright@eos-na.com Michael Longo – In House Counsel Michael.Longo@eos-na.com	(248) 635-1786		
Royal Bank of Canada 335 8 th Ave SW – 24 th Floor Calgary, Alberta T2P 1C9 Alex Wang alex.wang@rbc.com			Secured Creditor

Party/Counsel	Telephone	Facsimile	Party Represented
Nelson Kalin kalin_nelson@yahoo.com	(204) 944-9571		Creditor
Symmetry Media Graeme Findlay – Founder, Principal graeme@symmetrymedia.ca	(204) 803-7929		Unsecured Creditor
McCarthy Tetrault Suite 4000 421-7 th Avenue SW Calgary, AB R2P 4K9 Pantelis Kyriakakis pkiriakakis@mccarthy.ca	(204) 260-3536		Counsel for Realterm, RAL Calgary Cargo LP, Landlord of 47 Aero Drive NE property
MANITOBA HYDRO 360 Portage Avenue Winnipeg, MB R3C 0G8 Cathryn – Bankruptcy & Insolvency Rep MHBankruptcyinfo@hydro.mb.ca	(204) 360-5700		
Rene Gagnon 50 Tolcross Gate Winnipeg, MB R3Y 1M1 renshgag@hotmail.com			Shareholder
Jabil 10800 Roosevelt Blvd. N. St. Petersburg, Florida, USA 33716 Stephanie E. Ambs Stephanie_Ambs@jabil.com (Underscore between) Amanda Key Amanda_Key@jabil.com (Underscore between)	1-727-717-6451		Unsecured Creditor (Assistant Legal Counsel)

Party/Counsel	Telephone	Facsimile	Party Represented
Tekna Advanced Materials c/o Mr. Espen Schie and Mrs. Sophie Burgaud 2935 Boul Sherbrooke (Qc) Canada J1L 2T9 espen.schie@tekna.com sophie.burgaud@tekna.com			Creditor
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Bunzl Industrial 2270 Portland Street Calgary, AB T2G 4M6 Shannon Hussey Shannon.Hussey@bunzlcanada.ca	(403) 287-7145	(403) 287-2446	Creditor
Arthur D. Gagnon arthurdgagnon@gmail.com	(204) 447-7068		Shareholder
Harvey Hart 25 Carlington Crescent Oak Bluff. MB R4G 0C5 mhart9763@gmail.com			Shareholder
D'Arcy & Deacon LLP 2200 – One Lombard Place Winnipeg, MB R3B 0X7 Gurpreet Kensray gkensray@darcydeacon.com Travis Webber twebber@darcydeacon.com			Counsel for Great West Maintenance Service Ltd.

<u>Party/Counsel</u>	<u>Telephone</u>	<u>Facsimile</u>	<u>Party Represented</u>
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Hill Sokalski LLP 2670 – 360 Main Street Winnipeg, MB R3C 3Z3 Jesse Rock jrock@hillcounsel.com	 (204) 954-0761	 (204) 943-3934	Counsel for Creditor Joe Allison
Business Development Bank of Canada Lawrence Lee Lawrence.LEE@bdc.ca Matthew Zagozewski matthew.zagozewski@bdc.ca			
Clark SciTech Law LLP Denver Clarke denver@clarkescitechlaw.com Angela Bryne angela@clarkescitechlaw.com	 (587) 200-7080 ext 2		Counsel
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<u>Party/Counsel</u>	<u>Telephone</u>	<u>Facsimile</u>	<u>Party Represented</u>
Sheen Legend Packaging Corp c/o Coface North America Insurance Company 600 College Road East, Suite 1110 Princeton, New Jersey, USA 08540 Luis Torres luis.torres@coface.com			Creditor
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Service Canada – Wage Earner Protection Program WEPP Processing Centre PO Box 5900 Cornwall ON K6H 6J6		1-833-496-2230	Creditor
Diamond Bar C Syndicate Ltd. and W.J.L. Holdings Ltd. Chad Ford chad@diamondbarc.com Wade Larson wadelarson@gmail.com			
Bennet Jones LLP 4500 Bankers Hall East, 855 2 Street SW, Calgary, AB T2P 4K7 Jason Wang wangj@bennettjones.com	403-298-3459	403-265-7219	Counsel for Diamond Bar C Syndicate Ltd. and W.J.L. Holdings Ltd.