

COURT FILE NO.: 2401-15969

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

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

Clerk's Stamp



AND IN THE MATTER OF THE COMPROMISE OR ARRANGEMENT OF ANGUS A2A GP INC., ANGUS MANOR PARK A2A GP INC., ANGUS MANOR PARK A2A CAPITAL CORP., ANGUS MANOR PARK A2A DEVELOPMENTS INC., HILLS OF WINDRIDGE A2A GP INC., WINDRIDGE A2A DEVELOPMENTS, LLC, FOSSIL CREEK A2A GP INC., FOSSIL CREEK A2A DEVELOPMENTS, LLC, A2A DEVELOPMENTS INC., SERENE COUNTRY HOMES (CANADA) INC., A2A CAPITAL SERVICES CANADA INC., WINGHAM A2A DEVELOPMENTS INC., LAKE HURON SHORES A2A DEVELOPMENTS INC., and MEAFORD A2A DEVELOPMENTS INC

APPLICANT **ALVAREZ & MARSAL CANADA INC.**, in its capacity as Court-appointed Monitor of ANGUS A2A GP INC., ANGUS MANOR PARK A2A GP INC., ANGUS MANOR PARK A2A CAPITAL CORP., ANGUS MANOR PARK A2A DEVELOPMENTS INC., HILLS OF WINDRIDGE A2A GP INC., WINDRIDGE A2A DEVELOPMENTS, LLC, FOSSIL CREEK A2A GP INC., FOSSIL CREEK A2A DEVELOPMENTS, LLC, A2A DEVELOPMENTS INC., SERENE COUNTRY HOMES (CANADA) INC., A2A CAPITAL SERVICES CANADA INC., WINGHAM A2A DEVELOPMENTS INC., LAKE HURON SHORES A2A DEVELOPMENTS INC., and MEAFORD A2A DEVELOPMENTS INC.

DOCUMENT

APPLICATION

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

Cassels Brock & Blackwell LLP
Suite 3700, Bankers Hall West
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File No.: 57100-4

Attention: Jeffrey Oliver/Danielle Marechal

NOTICE TO THE RESPONDENTS AND SERVICE LIST IN SCHEDULE "B"

This application is made against you. You are a respondent.

You have the right to state your side of this matter before the judge.

To do so, you must be in Court when the application is heard as shown below:

Date January 19, 2026
 Time 2:00 p.m. MST
 Where Edmonton Courts Centre
<https://albertacourts.webex.com/meet/virtual.courtroom86>
 Before Whom The Honourable Justice Neilson

Go to the end of this document to see what you can do and when you must do it.

Remedy claimed or sought:

1. Alvarez & Marsal Canada Inc. ("A&M"), in its capacity as monitor (in such capacity, the "Monitor") of the Debtor Companies (as defined in **Schedule "A"** hereto) seeks, among other things:
 - (a) an order (the "Order") under the *Companies' Creditors Arrangement Act*, RSC 1985, c C-36, as amended (the "CCAA"), substantially in the form attached hereto as **Schedule "C"**, among other things:
 - (i) extending the Stay Period (as defined herein) up to and including May 31, 2026;
 - (ii) approving the Ninth Report of the Monitor dated January 12, 2026 (the "Ninth Report") and the conduct and activities of the Monitor set out therein;
 - (iii) approving the sale process (the "Additional Projects Sale Process") as outlined in the Ninth Report;
 - (iv) relieving the Debtor Companies and Affiliate Entities (as defined in **Schedule "A"** hereto) from any and all continuous disclosure, reporting and filing obligations (collectively, the "Securities Filings") that may be required of any Debtor Company or Affiliate Entity as a result of its status as a reporting issuer with the British Columbia Securities Commission ("BCSC");
 - (v) empowering and authorizing the Monitor to register a copy of the Additional Projects Order (as defined herein) in respect of the Additional Project Lands (as defined herein) in each of the registry offices for the respective Land Titles Division of Ontario against title to any of the Additional Project Lands, where the Monitor considers it necessary or desirable; and
 - (vi) approving the professional fees and disbursements of:
 - (A) the Monitor and Monitor's US counsel, Reed Smith LLP ("Reed Smith), for the period ending November 28, 2025,

- (B) the Monitor's US conflict counsel, Cavazos Hendricks Poirot, P.C. ("Cavazos") for the period ending August 8, 2025; and
- (C) the Monitor's Canadian counsel, Cassels Brock & Blackwell LLP ("Cassels") for the period ending December 31, 2025; and

(b) such further and other relief as this Honourable Court deems appropriate.

Grounds for making this application:

2. Capitalized terms not otherwise defined herein shall have the meaning given to such terms in the ARIES (as defined below) and the Ninth Report.

Procedural Background

3. On November 14, 2024, on application by an ad hoc group of Canadian investors in various real estate and land investment projects, this Honourable Court pronounced an initial order pursuant to the CCAA which, among other things, granted the Debtor Companies protection under the CCAA and appointed A&M as Monitor of the Debtor Companies with certain enhanced powers (the "**Initial Order**").
4. At the Comeback Application (as defined in the Ninth Report) the Debtor Companies brought an application seeking among other things to set aside the Initial Order (the "**Debtor Companies' Application**").
5. On November 25, 2024, this Honourable Court granted an amended and restated initial order (the "**ARIES**") under the CCAA, among other things:
 - (a) directing the Monitor to provide a comprehensive report (i.e., the Third Report) by 4:00 pm MST on Friday, December 13, 2024, to the Court to address, among other things:
 - (i) any entitlements of each class of investors, including the investors' rights to approve property sales;
 - (ii) the ownership of the properties;
 - (iii) the value of the properties;
 - (iv) the marketing process that was conducted or is being conducted for the properties; and

- (v) the investor approval process conducted for any sales, including how investors were notified of sales, what they were told, what opportunities they were given to approve sales, and how sales were approved, including by whom and under what authority; and
- (vi) directing the Debtor Companies and Affiliate Entities to provide to the Monitor by 4:00 pm MST on Friday December 6, 2024 (the "**Information Deadline**"), the Requested Information (as defined in the ARIO).

6. On January 29, 2025, the Honourable Justice Feasby released his decision (the "**Decision**") and granted an order under the CCAA granting the following relief:

- (a) dismissing the Debtor Companies' Application; and
- (b) directing the Monitor to, within 21 days of the Decision, provide this Court with a reasonable plan for gaining control of the Texas Lands and the proceeds of the Fossil Creek Sale and the Water District Sale (the "**Texas Plan**"). If the Texas Plan is not provided within 21 days and subsequently approved by this Court, then the CCAA proceedings shall terminate as against Fossil Creek A2A Developments, LLC, Windridge A2A Developments, LLC (collectively, the "**US Debtor Companies**"), Fossil Creek A2A GP Inc., Hills of Windridge A2A GP Inc., Fossil Creek A2A Limited Partnership, Hills of Windridge A2A LP, Fossil Creek A2A Trust and Hills of Windridge A2A Trust (together with the US Debtor Companies, the "**Windridge and Fossil Creek Entities**") and the Initial Order and the ARIO shall be vacated as against the Windridge and Fossil Creek Entities,

(the "**Dismissal Order**").

7. On March 5, 2025, the Honourable Justice Campbell granted an order under the CCAA, among other things approving the Texas Plan as outlined in the Fourth Report of the Monitor dated February 24, 2025 (the "**Texas Plan Order**").

8. On April 16, 2025, the Honourable Justice Feasby ordered, among other things, a sale process (the "**Angus Manor Sale Process**") for the marketing and sale of the Angus Manor Lands (as defined in the ARIO).

9. On October 23, 2025, the Court ordered (the "**Additional Projects Order**"), among other things, that Wingham Creek A2A Developments Inc. ("**Wingham Developments**"), Lake Huron Shores A2A Developments Inc. ("**LHS Developments**"), and Meaford A2A Developments Inc. ("**Meaford Developments**") be added as respondents in these CCAA Proceedings, declared all prior orders

made in the within CCAA Proceedings shall apply to Wingham Developments, LHS Developments and Meaford Developments) (the "**Additional Project Entities**") as of the date hereof, and amended the style of cause accordingly.

10. On October 31, 2025, the Court issued an order which, among other things:
 - (a) extended the Stay Period up to and including January 30, 2026;
 - (b) relieved the Debtor Companies and Affiliate Entities from any and all continuous disclosure, reporting, and filing obligations that may be required of any Debtor Company or Affiliate Entity, under any federal or provincial law respecting securities or capital markets in Canada, other than any rules or regulations of the BCSC;
 - (c) approved the amended Interim Lender's Charge and Administration Charge, with the following relative priorities:
 - (i) First – the Interim Lender's Charge to a maximum amount of \$1,500,000 plus the amount of all interest, fees and expenses in respect of the principal amount advanced with respect to the Interim Financing; and
 - (ii) Second – a subordinated Administration Charge, to a maximum of \$3,000,000;
 - (d) approved the activities and conduct of the Monitor as set out in the Seventh Report, the First Supplement to the Seventh Report, the Eighth Report and the First Supplement to the Eighth Report.

Appeals

11. The Debtor Companies have filed six applications for permission to appeal an order granted in these CCAA proceedings (the "**Appeal Applications**"). The Appeal Applications were heard by a single justice of the Alberta Court of Appeal on March 6, 2025.
12. On April 28, 2025, the Court of Appeal of Alberta granted permission to appeal the following questions:
 - (a) Did the supervising justice err in concluding that the Canadian investors came within the scope of the CCAA, and that the use of the CCAA in these circumstances was proper either in the decision reported at 2025 ABKB 51 or in the earlier unreported decision on November 25, 2024?

(b) Did the supervising justice err in concluding that entities within the A2A Group, including the Windridge and Fossil Creek Groups and the US LLCs, were subject to the CCAA in his decision reported at 2025 ABKB 51, or in the earlier unreported decision on November 25, 2024?

(the “**Appeals**”).

13. The Appeals were heard in the Alberta Court of Appeal on September 8, 2025. The Alberta Court of Appeal's decision is reserved and has yet to be released as at the date of the Ninth Report.

Stay Extension

14. The Stay Period will expire on January 30, 2026.

15. The Monitor requests that the stay of proceedings be extended to May 31, 2026 (the “**Stay Extension**”).

16. In accordance with the terms of the ARIO, the Monitor has been working diligently with its Canadian and US counsel and Representative Counsel (as defined in the Ninth Report) to implement the sale process, gather and review discovery related to the Fossil Creek Sale and Water District Sale in order to advance the Texas Plan, and to prepare the Ninth Report. As a court-appointed officer, the Monitor with enhanced powers, on behalf of the Debtor Companies, is presumed to be acting in good faith and with due diligence.

17. The requested Stay Extension is required as it will afford the Monitor sufficient time to:

- (a) continue the marketing of the Angus Manor Lands pursuant to the Angus Manor Sale Process;
- (b) initiate a marketing of the Additional Projects Lands, should the Additional Projects Sale Process be approved;
- (c) subject to the disposition of the Appeals, continue to advance the Texas Plan including, without limitation, to complete its review of the discovery related to the Fossil Creek Sale and Water District Sale and vigorously pursue the necessary litigation that is the subject of the Texas Plan; and
- (d) with the assistance of Offshore Rep Counsel, attempting to contact Offshore Investors to seek information relevant to the proceedings.

18. The Monitor does not believe any creditor of the Debtor Companies will be materially prejudiced by the proposed Stay Extension.
19. It is just, convenient, and in the best interest of the Debtor Companies and their stakeholders for the Debtor Companies to continue to be afforded the protections of the CCAA pursuant to the Stay Extension.

Approval of the Monitor's Conduct and Activities

20. The Monitor has acted diligently and appropriately since its appointment as Monitor.
21. The actions, conduct and activities of the Monitor as described in the Ninth Report are lawful, proper, and consistent with its powers under the ARIO or such other order of this Honourable Court.

Additional Project Sales Process

22. One of the principal purposes of these CCAA proceedings was to create a stabilized environment to conduct a court-supervised sale process of the Debtor Companies' real property for the benefit of all stakeholders.
23. The Additional Project lands are legally described as:
 - (a) PT LTS 5 AND 6 CON 1 TURNBERRY BEING PT 1, 22R5848 EXCEPT PT 1, 22R5878; MORRIS-TURNBERRY/NORTH HURON (the "**Wingham Lands**");
 - (b) PT RDAL BTN LT 9 AND LT 10 ST. VINCENT CLOSED BY R252709; PT LT 9-10 CON 2 ST. VINCENT PT 1 – 16, 18, 31 – 46, 49 – 58, 64 & 65, 67 – 78, 80 – 82, BLK A, GORDON ST, SUZANNE ST, MICHELE AV & BURNETT ST, RD36; PT 6 & 9 16R2726; PT 16 – 37 RD101; PT 38 – 82 & PT 91 RD101; PT 1 – 30 & 34 – 38 RD108; PT 1 – 22 RD111 & AS IN R252710 (FOURTHLY) EXCEPT PT 1, 2, & 3 AS IN R559723; S/T R252710; PT LT 9 CON 1 ST. VINCENT; PT LT 9 CON 2 ST. VINCENT AS IN R253576 EXCEPT PT 1 16R3404; MUNICIPALITY OF MEAFORD (the "**Meaford Lands**"); and
 - (c) LT 4 PL 538 GODERICH; LT 10 PL 538 GODERICH; PT OLD RAILWAY PART PL 538 GODERICH; PT LT 3 PL 538 GODERICH; PT LT 5 PL 538 GODERICH; PT LT 8 PL 538 GODERICH; PT LT 9 PL 538 GODERICH; PT LT 11 PL 538 GODERICH; PT LT 5 CON 1 GODERICH AS IN R194853; SAVE & EXCEPT HWP2187; MUNICIPALITY OF CENTRAL HURON (the "**LHS Lands**" and together with the Meaford Lands and the Wingham Lands (the "**Additional Projects Lands**")).

24. An overview and summary of the Additional Projects Sale Process is set out in the Ninth Report.
25. The Monitor (in consultation with Representative Counsel) intends to engage one or multiple independent real estate brokerage(s) with experience in real estate acquisition, asset divestiture activities and experience in the sale of distressed assets in the insolvency context. The Monitor will consider the mix of work fee and success fee (including a split with or without a cooperating broker) selecting the preferred real estate broker(s). The real estate broker may be the same for all Additional Projects, or a unique real estate broker may be selected for certain properties (as the case may be, a "**Sale Advisor**").
26. The Sale Advisor, with assistance provided by the Monitor, will conduct a sale process pursuant to the proposed Additional Projects Sale Process.
27. Key features of the Additional Projects Sale Process include, among other things:
 - (a) the Additional Projects Sale Process will be performed by the Sale Advisor and the Monitor, in consultation with Representative Counsel and any other relevant stakeholders;
 - (b) all qualified interested parties will be provided with an opportunity to participate in the Additional Projects Sale Process;
 - (c) the Additional Project Lands will be marketed and sold on an "as is, where is" basis; and
 - (d) given the nature of the Additional Project Entities' Property, the Sale Advisor (with the support of the Monitor) will not affix a bid deadline; instead, the Sale Advisor will go to market with a listing price. In the event there appears to be competition as between potential purchasers, the Sale Advisor will affix a bid deadline approximately ten business days upon receipt of an acceptable offer and notify all past interested parties of same.
28. The Monitor is of the view that the Additional Projects Sale Process is commercially reasonable and fair in the circumstances for the following reasons, among others:
 - (a) the Additional Projects Sale Process provides a fair and transparent process which will be conducted in such a manner as to give potential bidders equal access to express their interest in making an offer for the Additional Projects Lands;
 - (b) it provides for a marketing process to sufficiently expose the Property to the market;

- (c) the Monitor is not aware of any stakeholder that is prejudiced by the Additional Projects Sale Process;
- (d) the selected Sale Advisor will have sufficient experience in marketing distressed assets in these types of circumstances; and
- (e) the proposed marketing process is supported by Representative Counsel.

29. Additionally, the Monitor is of the view that the Additional Projects Sale Process is in the best interests of the Debtor Companies' stakeholders.

30. If the Court approves the Additional Projects Sale Process, the Monitor and the Debtor Companies will be able to effectively market the Additional Projects Lands to identify purchasers in a fair and reasonable process.

31. Approval of the Additional Projects Sale Process will enhance the Debtor Companies and the Monitor's efforts to maximize value through these CCAA proceedings.

Exemption from BCSC Reporting Requirements

32. The Monitor seeks an order relieving the Debtor Companies and Affiliate Entities from any and all Securities Filing obligations that may be required of any Debtor Company or Affiliate Entity as a result of its status as a reporting issuer under any applicable securities legislation, regulations or rules of the BCSC.

33. On October 29, 2025, the Monitor brought an application pursuant to section 11.1(3) of the CCAA, seeking the Court's authorization to cease incurring any further related costs in relation to public disclosure. One of the statutory requirements under section 11.1(3) of the CCAA is the provision of proper notice to the relevant securities authority. At that time, the Monitor was not able to serve the BCSC before the October 29, 2025 application, which decision was reserved until October 31, 2025, and accordingly carved the BCSC out of the relief sought. The Monitor has now been able to properly serve the BCSC and seeks exemptive relief with respect to any reporting obligations (the "**Securities Filings**") of any of the Debtor Companies or Affiliate Entities to the BCSC (the "**Applicable Securities Law**").

34. The Monitor has determined that devoting additional time or cost towards curing the Debtor Companies' public disclosure defaults and restoring the status of all Debtor Companies and Affiliate Entities to a reporting issuer that is not in default of the applicable securities legislation, regulations or rules of the BCSC is not appropriate nor cost effective at this juncture. Further, the Monitor is

not in possession of sufficient information from the Debtor Companies to comply with such obligations in any event.

Registration of the Additional Projects Order

35. The Monitor is seeking relief which would permit the Additional Projects Order to be registered by the Ontario Land Registry Office (the "ON Registry") on title to the Additional Projects Lands.
36. Pursuant to paragraph 39(b) of the ARIQ, the Monitor was granted the authority to, among other things, preserve, protect, and exercise control over the Property, wherever the Monitor considers it necessary to do so.
37. The ON Registry requires explicit language in a court order to permit registration of such order on title.
38. The Monitor is seeking this Court's approval to register the Additional Projects Order on title to the Additional Projects Lands.

Approval of Professional Fees

39. The total fees and disbursements of the Monitor for the period from May 1, 2025 to November 28, 2025 are \$141,452.00, inclusive of GST in the amount of \$6,735.81.
40. The total fees and disbursements of the Monitor's US counsel, Reed Smith LLP, for the period from February 1, 2025 to November 28, 2025 are USD \$137,050.06.
41. The total fees of the Monitor's US conflict counsel, Cavzos Hendricks Poirot, P.C., for the period from January 1, 2025 to August 8, 2025 are USD \$3,904.51.
42. The total fees and disbursements of the Monitor's Canadian counsel, Cassels, for the period from May 1, 2025 to December 31, 2025 are \$324,884.82, inclusive of GST in the amount of \$15,428.80.
43. The Monitor is of the view that its fees and disbursements and those of its legal counsel are reasonable in the circumstances, and commensurate with the work performed by the parties, which was necessary and appropriate in the circumstances.

Material or evidence to be relied on:

44. Pre-Filing Report of the Proposed Monitor dated November 12, 2024;
45. Consent to Act as Monitor and Receiver executed by a duly authorized representative of A&M, filed November 14, 2024;

46. First Report of the Monitor, dated November 20, 2024;
47. First Supplement to the First Report of the Monitor dated November 21, 2024;
48. Second Supplement to the First Report of the Monitor dated November 25, 2024;
49. Second Report of the Monitor dated November 28, 2024;
50. Third Report of the Monitor dated December 13, 2024;
51. First Supplement to the Third Report of the Monitor dated December 17, 2024;
52. Fourth Report of the Monitor dated February 19, 2025;
53. First Supplement to the Fourth Report of the Monitor dated February 24, 2025;
54. Fifth Report of the Monitor dated April 7, 2025;
55. First Supplement of the Fifth Report of the Monitor dated April 15, 2025;
56. Sixth Report of the Monitor dated June 10, 2025;
57. Seventh Report of the Monitor dated July 21, 2025;
58. First Supplement to the Seventh Report of the Monitor dated September 15, 2025;
59. Eighth Report of the Monitor dated October 17, 2025;
60. First Supplement to the Eight Report of the Monitor dated October 28 2025;
61. Ninth Report of the Monitor dated January 12, 2026; and
62. Such further and other material or evidence as counsel may advise and this Honourable Court permits.

Applicable Acts and regulations:

63. *Companies' Creditors Arrangement Act*, RSC 1985, c C-36, as amended, in particular sections 2 to 5, 11, 11.001, 11.02, 11.2, 11.7, and 18.6;
64. Alberta *Rules of Court*, AR 124/2010 and in particular, Rule 13.5;
65. Such further and other legislation as counsel may advise and this Honourable Court permits.

How the application is proposed to be heard or considered:

66. Via Webex, on the Edmonton Commercial List before the Honourable Justice Neilson.

WARNING

You are named as a respondent because you have made or are expected to make an adverse claim in respect of this originating application.

If you do not come to Court either in person or by your lawyer, the Court may make an order declaring you and all persons claiming under you to be barred from taking any further proceedings against the applicant and against all persons claiming under the applicant. You will be bound by any order the Court makes, or another order might be given or other proceedings taken which the applicant is entitled to make without any further notice to you.

If you want to take part in the application, you or your lawyer must attend in Court **[or via Webex]** on the date and at the time shown at the beginning of this form. If you intend to give evidence in response to the application, you must reply by filing an affidavit or other evidence with the Court and serving a copy of that affidavit or other evidence on the applicant a reasonable time before the application is to be heard or considered.

SCHEDULE "A"

- (a) Angus A2A GP Inc. ("**Angus GP**");
- (b) Angus Manor Park A2A GP Inc. ("**Angus Manor GP**");
- (c) Angus Manor Park A2A Capital Corp. ("**Angus Manor Capital**");
- (d) Angus Manor Park A2A Developments Inc. ("**Angus Manor Developments**");
- (e) Hills of Windridge A2A GP Inc. ("**Windridge GP**");
- (f) Windridge A2A Developments, LLC ("**Windridge Developments**");
- (g) Fossil Creek A2A GP Inc. ("**Fossil Creek GP**");
- (h) Fossil Creek A2A Developments, LLC ("**Fossil Creek Developments**");
- (i) A2A Developments Inc. ("**Developments**");
- (j) Serene Country Homes (Canada) Inc. ("**Serene**");
- (k) A2A Capital Services Canada Inc. ("**A2A CSC**");
- (l) Wingham Creek A2A Developments Inc. ("**Wingham Developments**");
- (m) Lake Huron Shores A2A Developments Inc. ("**LHS Developments**"); and
- (n) Meaford A2A Developments Inc. ("**Meaford Developments**"),

(collectively, the "**Debtor Companies**").

- (a) Angus A2A Limited Partnership ("**Angus LP**");
- (b) Angus Manor Park A2A Limited Partnership ("**Angus Manor LP**");
- (c) Hills of Windridge A2A LP ("**Windridge LP**");
- (d) Hills of Windridge A2A Trust ("**Windridge Trust**");
- (e) Fossil Creek A2A Limited Partnership ("**Fossil Creek LP**");
- (f) Fossil Creek A2A Trust ("**Fossil Creek Trust**"),

(collectively, the "**Affiliate Entities**").

SCHEDULE "B"

SERVICE LIST

SCHEDULE "A" – SERVICE LIST
Action No. 2401-15969
Last Update November 24, 2025

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SCHEDULE "C"

ORDER

COURT FILE NUMBER 2401-15969

Clerk's Stamp

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

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

AND IN THE MATTER OF THE COMPROMISE OR ARRANGEMENT OF ANGUS A2A GP INC., ANGUS MANOR PARK A2A GP INC., ANGUS MANOR PARK A2A CAPITAL CORP., ANGUS MANOR PARK A2A DEVELOPMENTS INC., HILLS OF WINDRIDGE A2A GP INC., WINDRIDGE A2A DEVELOPMENTS, LLC, FOSSIL CREEK A2A GP INC., FOSSIL CREEK A2A DEVELOPMENTS, LLC, A2A DEVELOPMENTS INC., SERENE COUNTRY HOMES (CANADA) INC., A2A CAPITAL SERVICES CANADA INC., WINGHAM A2A DEVELOPMENTS INC., LAKE HURON SHORES A2A DEVELOPMENTS INC., and MEAFORD A2A DEVELOPMENTS INC.

APPLICANT **ALVAREZ & MARSAL CANADA INC.**, in its capacity as Court-appointed Monitor of ANGUS A2A GP INC., ANGUS MANOR PARK A2A GP INC., ANGUS MANOR PARK A2A CAPITAL CORP., ANGUS MANOR PARK A2A DEVELOPMENTS INC., HILLS OF WINDRIDGE A2A GP INC., WINDRIDGE A2A DEVELOPMENTS, LLC, FOSSIL CREEK A2A GP INC., FOSSIL CREEK A2A DEVELOPMENTS, LLC, A2A DEVELOPMENTS INC., SERENE COUNTRY HOMES (CANADA) INC., A2A CAPITAL SERVICES CANADA INC., WINGHAM A2A DEVELOPMENTS INC., LAKE HURON SHORES A2A DEVELOPMENTS INC., and MEAFORD A2A DEVELOPMENTS INC.

DOCUMENT **ORDER APPROVING STAY EXTENSION**

ADDRESS FOR
SERVICE AND
CONTACT
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OF PARTY
FILING THIS
DOCUMENT

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P: 403 351 2920 / 403 351 2922

Attention: Jeffrey Oliver / Danielle Marechal

File no. 57100-4

DATE ON WHICH ORDER WAS PRONOUNCED: January 19, 2026

LOCATION WHERE ORDER WAS PRONOUNCED: Edmonton, Alberta

JUSTICE WHO MADE THIS ORDER: The Honourable Justice Neilson

UPON the application (the "**Application**") of Alvarez & Marsal Canada Inc. ("**A&M**") in its capacity as the court-appointed monitor with enhanced powers (in such capacity, the "**Monitor**") of Angus A2A GP Inc., Angus Manor Park A2A GP Inc., Angus Manor Park A2A Capital Corp., Angus Manor Park A2A Developments Inc., Hills of Windridge A2A GP Inc., Fossil Creek A2A GP Inc., A2A Developments Inc., Serene Country Homes (Canada) Inc., A2A Capital Services Canada Inc., Wingham A2A Developments Inc., Lake Huron Shores A2A Developments Inc., and Meaford A2A Developments Inc. (together the "**Canadian Respondents**") and Fossil Creek A2A Developments, LLC and Windridge A2A Developments, LLC (the "**US Debtor Companies**" and together with the Canadian Respondents, the "**Debtor Companies**"); **AND UPON** having read the Pre-filing Report of the Monitor dated November 13, 2024, the First Report of the Monitor dated November 20, 2024, the First Supplement to the First Report of the Monitor dated November 21, 2024, the Second Supplement to the First Report of the Monitor dated November 25, 2024, the Second Report of the Monitor dated November 28, 2024, the Third Report of the Monitor dated December 13, 2024, the First Supplement to the Third Report of the Monitor dated December 17, 2024, the Fourth Report of the Monitor dated February 19, 2025, the First Supplement to the Fourth Report of the Monitor dated February 24, 2025, the Fifth Report of the Monitor dated April 7, 2025, the First Supplement to the Fifth Report of the Monitor dated April 15, 2025, the Sixth Report of the Monitor dated June 10, 2025, the Seventh Report of the Monitor dated July 21, 2025; the First Supplement to the Seventh Report of the Monitor dated September 15, 2025, the Eighth Report of the Monitor dated October 17, 2025; the First Supplement to the Eighth Report of the Monitor dated October 28, 2025; and the Ninth Report of the Monitor dated January 12, 2026; **AND UPON** reviewing the Initial Order granted by the Honourable Justice C. Feasby in these proceedings on November 14, 2024, the Amended and Restated Initial Order granted by the Honourable Justice C. Simard in these proceedings on November 25, 2024 (the "**ARIO**"), the Order granted by the Honourable Justice C. Feasby in these proceedings on December 20, 2024, the Order granted by the Honourable Justice C. Feasby in these proceedings on January 29, 2025, the Order granted by the Honourable Justice C. Feasby in these proceedings on February 11, 2025, the Order granted by the Honourable Justice Campbell in these proceedings dated March 5, 2025, the Order granted by the Honourable Justice C. Feasby in these proceedings dated April 16, 2025; the Order granted by the Honourable Justice Neufeld in these proceedings dated June 19, 2025, the Order granted by the Honourable Justice D. Mah in these proceedings dated July 29, 2025, and the Order granted by the Honourable Justice Bourque in these proceedings dated October 23, 2025 (the "**Additional Project Order**"); and the Order granted by the Honourable Justice Jones on October 31, 2025; **AND UPON** hearing counsel for the Monitor, Representative Counsel, counsel for the US Debtor Companies and counsel for the Canadian Respondents and any other party in attendance on January 19, 2026; **IT IS HEREBY ORDERED AND DECLARED THAT:**

SERVICE OF APPLICATION

1. The time for service of the Application for this order (the "**Order**") is deemed good and sufficient and the Application is properly returnable today.

CAPITALIZED TERMS

2. Capitalized terms used herein but not otherwise defined in this Order shall have the meaning given to such terms in the ARIO or the Ninth Report.

STAY OF PROCEEDINGS

3. The Stay Period is hereby extended until and including May 31, 2026.

APPROVAL OF ADDITIONAL PROJECTS SALE PROCESS

4. The Additional Projects Sale Process, as outlined within the Ninth Report, is hereby ratified and approved.
5. The Monitor is empowered and authorized to, in conjunction with a Sale Advisor, implement the Additional Projects Sale Process and do all things reasonably necessary to conduct and give full effect to the Additional Projects Sale Process, and carry out the obligations thereunder including but not limited to, taking any additional steps or executing additional documents as may be necessary or desirable in order to carry out and complete the Additional Projects Sale Process.

EXEMPTION FROM CERTAIN REPORTING OBLIGATIONS

6. For the duration of the Stay Period, the Debtor Companies and Affiliate Entities (as defined in the ARIO) are relieved from any and all continuous disclosure, reporting and filing obligations (collectively the "**Securities Filings**") that may be required of any Debtor Company or Affiliate Entity under any federal or provincial law respecting securities or capital markets in Canada, including, without limitation, the *Securities Act, RSBC 1996, c 418* and the regulations promulgated thereunder, any rules and regulations the British Columbia Securities Commission (collectively, the "**Applicable Securities Law**").
7. None of the Monitor or the Monitor's directors, officers, employees, and other representatives shall have any personal liability for any failure by the Debtor Companies to make any Securities Filings required by any Applicable Securities Law.

REGISTRATION OF ADDITIONAL PROJECTS ORDER ON TITLE

8. The Monitor is hereby expressly empowered and authorised to register a copy of the Additional Projects Order in respect of the lands legally described as:
 - (a) PT LTS 5 AND 6 CON 1 TURNBERRY BEING PT 1, 22R5848 EXCEPT PT 1, 22R5878; MORRIS-TURNBERRY/NORTH HURON (the "**Wingham Lands**");
 - (b) PT RDAL BTN LT 9 AND LT 10 ST. VINCENT CLOSED BY R252709; PT LT 9-10 CON 2 ST. VINCENT PT 1 – 16, 18, 31 – 46, 49 – 58, 64 & 65, 67 – 78, 80 – 82, BLK A, GORDON ST, SUZANNE ST, MICHELE AV & BURNETT ST, RD36; PT 6 & 9 16R2726; PT 16 – 37 RD101; PT 38 – 82 & PT 91 RD101; PT 1 – 30 & 34 – 38 RD108; PT 1 – 22 RD111 & AS IN R252710 (FOURTHLY) EXCEPT PT 1, 2, & 3 AS IN R559723; S/T R252710; PT LT 9 CON 1 ST. VINCENT; PT LT 9 CON 2 ST. VINCENT AS IN R253576 EXCEPT PT 1 16R3404; MUNICIPALITY OF MEAFORD (the "**Meaford Lands**"); and
 - (c) LT 4 PL 538 GODERICH; LT 10 PL 538 GODERICH; PT OLD RAILWAY PART PL 538 GODERICH; PT LT 3 PL 538 GODERICH; PT LT 5 PL 538 GODERICH; PT LT 8 PL 538 GODERICH; PT LT 9 PL 538 GODERICH; PT LT 11 PL 538 GODERICH; PT LT 5 CON 1 GODERICH AS IN R194853; SAVE & EXCEPT HWP2187; MUNICIPALITY OF CENTRAL HURON (the "**LHS Lands**" and together with the Meaford Lands and the Wingham Lands (the "**Additional Project Lands**")

each in the registry office for the Land Titles Divisions of Grey (No. 16) and Huron (No. 22) against title to any of the Additional Project Lands, where the Monitor considers it necessary or desirable.

9. The Land Registry Office for the Divisions of Grey (No. 16) and Huron (No. 22) is hereby directed to accept this Order for registration on title to the Additional Project Lands

APPROVAL OF ACTIVITIES OF MONITOR

10. The Ninth Report of the Monitor dated January 12, 2026 and the actions, conduct and activities of the Monitor set out therein are approved.

APPROVAL OF PROFESSIONAL FEES

11. The fees and disbursements of the Monitor and Monitor's US counsel, US conflicts counsel, and Canadian counsel, as set out in the Ninth Report, are hereby approved without the necessity of a

formal passing of its accounts.

SERVICE AND NOTICE PROTOCOL

12. The Monitor shall post a copy of this Order to the Monitor's Website for these proceedings:
www.alvarezandmarsal.com/a2a.
13. Service of this Order to any other party is hereby dispensed with.

Justice of the Court of King's Bench of Alberta