

COURT FILE NUMBER

2401-15969

COURT

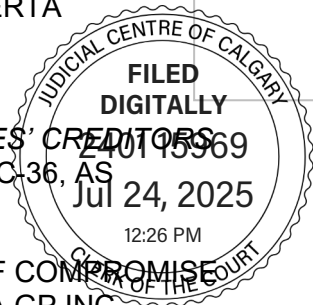
COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE

CALGARY

Clerk's Stamp

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



AND IN THE MATTER OF A PLAN OF 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, LCC, A2A DEVELOPMENTS
INC., SERENE COUNTRY HOMES (CANADA) INC. and
A2A CAPITAL SERVICES CANADA INC.

APPLICANTS

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, LCC,
A2A DEVELOPMENTS INC., SERENE COUNTRY
HOMES (CANADA) INC. and A2A CAPITAL SERVICES
CANADA INC.

DOCUMENT

APPLICATION – SEALING ORDER

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS
DOCUMENT

MILES DAVISON LLP
Barristers and Solicitors
900, 517 – 10th Avenue S.W.
Calgary, Alberta T2R 0A8
Attention: Daniel Jukes
Telephone: (403) 298-0327
Facsimile: (403) 263-6840
djukes@milesdavison.com
File No: 57066 DKJ

NOTICE TO RESPONDENTS:

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

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

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

Date: **July 29, 2025** **COMMERCIAL LIST**
Time: **2:00 pm**
Where: **Edmonton Court of King's Bench**
Via Webex – VC 86 -
<https://albertacourts.webex.com/meet/virtual.courtroom86>

Before Whom: **The Honourable Justice Mah**

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

Remedy claimed or sought:

1. An Order abridging the time for service, if necessary, and an Order deeming service of this Application good and sufficient.
2. An Order, substantially in the form attached as Appendix "A":
 - a) Sealing the Affidavit of Neil Warshafsky sworn July 22, 2025.
 - b) Sealing the Affidavit of George Chambers, to be sworn.
3. Such further and other relief as the Honourable Court considers just and appropriate.

Grounds for making this application:

4. A Sealing Order is appropriate, as the Affidavits contain commercially sensitive information about the marketing of certain lands. It is in the public interest to ensure the integrity of proceedings, there are no alternative measures that would be adequate, and the benefits of the Sealing Order outweigh the deleterious effects.
5. Notice to the media has been provided.
6. Such further and other grounds as may be advanced by Counsel and this Honourable Court may permit.

Material or evidence to be relied on:

7. The pleadings, Affidavits, and Reports filed in this action to date.
8. Such further and other materials as counsel may advise and this Honourable Court may permit.

Applicable rules:

9. *The Alberta Rules of Court*

Applicable Acts and regulations:

10. *The Companies' Creditors Arrangement Act* (Canada).

11. *The Judicature Act* (Alberta)

12. Such further and other legislation as counsel may advise and this Honourable Court may permit.

Any irregularity complained of or objection relied on:

13. N/A

How the application is proposed to be heard or considered:

14. On the Commercial List via WebEx.

WARNING

If you do not come to Court either in person or by your lawyer, the Court may give the applicant(s) what they want in your absence. You will be bound by any order that the Court makes. If you want to take part in this application, you or your lawyer must attend in Court on the date and at the time shown at the beginning of the 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(s) a reasonable time before the application is to be heard or considered.

APPENDIX "A"

Clerk's Stamp

COURT FILE NUMBER 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

AND IN THE MATTER OF A PLAN OF 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, LCC, A2A DEVELOPMENTS
INC., SERENE COUNTRY HOMES (CANADA) INC. and
A2A CAPITAL SERVICES CANADA INC.

DOCUMENT **SEALING ORDER**

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS
DOCUMENT

MILES DAVISON LLP
Barristers and Solicitors
900, 517 – 10th Avenue S.W.
Calgary, Alberta T2R 0A8
Attention: Daniel Jukes
Telephone: (403) 298-0327
Facsimile: (403) 263-6840
djukes@milesdavison.com
File No: 57066 DKJ

DATE ON WHICH ORDER WAS PRONOUNCED:	July 29, 2025
LOCATION WHERE ORDER WAS PRONOUNCED:	Calgary, Alberta
NAME OF JUSTICE WHO MADE THIS ORDER:	The Honourable Justice Mah

UPON THE APPLICATION by Meaford A2A Developments Inc., Lake Huron Shores A2A Developments Inc., and Wingham Creek A2A Developments Inc (the "Applicants");

AND UPON HAVING heard from counsel for the Applicants and counsel from other parties present at the hearing;

IT IS HEREBY ORDERED AND DECLARED THAT:

1. Each of the following Affidavits:

- a. The Affidavit of Neil Warshafsky sworn in this action on July 22, 2025 (the "Warshafsky Affidavit"); and
- b. The Affidavit of George Chambers sworn _____, 2025 (the "Chambers Affidavit");

shall be sealed by the Clerk of the Court, kept confidential and not be available for public viewing on the court file.

2. This Sealing Order shall expire:

- a. As to the Warshafsky Affidavit, upon the earlier of 2 years or the closing of a sale for the Meaford Lands, as defined in the Monitor's 7th Report, unless extended by further Order.
- b. As to the Chambers Affidavit, upon the earlier of 2 years or until the closing of a sale of both the Wingham Lands and Lake Huron Lands, as defined in the Monitor's 7th Report, unless extended by further Order.

3. The Warshafsky Affidavit and Chambers Affidavit shall be sealed and filed in respective envelopes containing the following statement:

THIS ENVELOPE CONTAINS THE CONFIDENTIAL AFFIDAVIT OF NEIL WARSHAFSKY SWORN JULY 22, 2025, WHICH SHALL BE SEALED ON THE COURT RECORD AND IS NOT TO BE PLACED ON THE PUBLIC RECORD OR MADE PUBLICLY ACCESSIBLE UNTIL THE EARLIER OF JULY 29, 2027 OR THE CLOSING OF A SALE FOR THE MEAFORD LANDS, AS DEFINED IN THE MONITOR'S 7TH REPORT, UNLESS EXTENDED BY FURTHER ORDER.

THIS ENVELOPE CONTAINS THE CONFIDENTIAL AFFIDAVIT OF GEORGE CHAMBERS SWORN _____ 2025, WHICH SHALL BE SEALED ON THE COURT RECORD AND IS NOT TO BE PLACED ON THE PUBLIC RECORD OR MADE PUBLICLY ACCESSIBLE UNTIL THE EARLIER OF JULY 29, 2027 OR THE CLOSING OF A SALE FOR BOTH THE LAKE HURON LANDS AND WINGHAM CREEK LANDS, AS DEFINED IN THE MONITOR'S 7TH REPORT, UNLESS EXTENDED BY FURTHER ORDER.

4. Any interested party is at liberty to bring an application to lift the sealing order or for further advice and direction as may be necessary to give full force and effect to the terms of this Order.

Justice of the Court of King's Bench of
Alberta