

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
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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:	September 26, 2025	<u>COMMERCIAL LIST</u>
Time:	2:00 pm	
Where:	Court of King's Bench – via Webex – VC 60	<u>https://albertacourts.webex.com/meet/virtual.courtroom60</u>
Before Whom:	The Honourable Justice Bourque	

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 sealing the transcripts of the Questioning on Affidavits of Neil Warshafsky and George Chambers
3. Such further and other relief as the Honourable Court considers just and appropriate.

Grounds for making this application:

4. A Sealing Order was granted over the Affidavits of Neil Warshafsky and George Chambers sworn July 22, 2025 and July 25, 2025 respectively.
5. A Sealing Order is appropriate, as the transcripts contain commercially sensitive information about the marketing of the Meaford, Lake Huron Shores, and Wingham properties, as defined in the Affidavits and Reports in these proceedings.
6. 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.
7. Such further and other grounds as may be advanced by Counsel and this Honourable Court may permit.

Material or evidence to be relied on:

8. The Sealing Order granted by the Honourable Justice Mah on July 29, 2025.
9. The pleadings, Affidavits, and Reports filed in this action to date.

10. Such further and other materials as counsel may advise and this Honourable Court may permit.

Applicable rules:

11. The *Alberta Rules of Court*

Applicable Acts and regulations:

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

13. The *Judicature Act* (Alberta)

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

Any irregularity complained of or objection relied on:

15. N/A

How the application is proposed to be heard or considered:

16. 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.