

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 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.

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.
and A2A CAPITAL SERVICES CANADA INC.

DOCUMENT **APPLICATION**

ADDRESS FOR
SERVICE AND
CONTACT
INFORMATION
OF PARTY
FILING THIS
DOCUMENT

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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	October 29, 2025
Time	2:00 p.m. MST
Where	Calgary Courts Centre https://albertacourts.webex.com/meet/virtual.courtroom60

Before Whom The Honourable Justice Jones

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 January 30, 2026;
 - (ii) 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 under any federal or provincial law of Canada (the "**Applicable Securities Law**");
 - (iii) granting an increase in the aggregate amount of the Administration Charge (as defined herein) to a maximum amount of \$3,000,000;
 - (iv) granting an increase in the aggregate amount of the Interim Lender's Charge (as defined herein) to a maximum amount of \$1,750,000; and
 - (v) approving the Seventh Report of the Monitor dated July 19, 2025 (the "**Seventh Report**") the First Supplement to the Seventh Report of the Monitor dated September 15, 2025 ("**First Supplement to Seventh Report**"), the Eighth Report of the Monitor dated October 17, 2025 (the "**Eighth Report**") and the conduct and activities of the Monitor set out therein; 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 ARIO (as defined below) and the Eighth 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 Hearing (as defined in the Eighth 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 "**ARIO**") 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. As further detailed in the Monitor's Previous Reports (as defined in the Eighth Report), the Debtor Companies failed to provide the majority of the Requested Information by the Information Deadline.

7. 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**").
8. 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**").
9. 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).
10. On July 29, 2025, the Monitor appeared before this Honourable Court (the "**July 29 Hearing**") to make an application requesting an order, among other things, adding Wingham Creek A2A Developments Inc. ("**Wingham Developments**"), Lake Huron Shores A2A Developments Inc. ("**LHS Developments**"), and Meaford A2A Developments Inc. ("**Meaford Developments**") as respondents in these CCAA Proceedings, declare 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 amend the style of cause accordingly.
11. At the July 29 Hearing, the Court issued an order which extended the Stay Period up to and including October 31, 2025 (the "**July 29 Order**"). The remainder of the relief sought at the July 29 Hearing was adjourned to September 26, 2025 (the "**Adjourned Application**").

12. At the conclusion of the Adjourned Application, the Court reserved their decision. As of the date hereof, such decision has not yet been released.

Appeals

13. The Debtor Companies have filed six applications for permission to appeal an order granted in these CCAA proceeds (the “**Appeal Applications**”). The Appeal Applications were heard by a single justice of the Alberta Court of Appeal on March 6, 2025.
14. 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**”).
15. 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.

Texas Plan

16. As further detailed in the Monitor's Fourth Report dated February 19, 2025 (the “**Fourth Report**”), the US Debtor Companies caused a portion of the Windridge Lands and the majority of the Fossil Creek Lands to be sold pursuant to the Water District Sale and Fossil Creek Sale, respectively.
17. Following the approval of the Texas Plan, on March 17, 2025, the Monitor caused each of the US Debtor Companies to commence Chapter 11 Cases in the US Bankruptcy Court. The US Debtor Companies each filed a Motion for Entry of an Order (i) Confirming the Automatic Stay Applied to All Assets of the Debtors Wherever Located; (ii) Extending the Automatic Stay to Debtor Property Held in the Name of Nondebtor Entities, or (iii) in the Alternative Imposing the Automatic Stay to Debtor Property Held in the Name of Nondebtors (the “**Motion**”).

18. On April 4, 2025, counsel for the Hills of Windridge, LP and Trails of Fossil Creek Properties, LP filed an objection to the Motion. An evidentiary hearing with respect to the Motion was heard on June 3, 2025 (the "**Motion Hearing**") in the US Bankruptcy Court in the Northern District of Texas. The Monitor appeared and provided sworn testimony remotely via Webex at the Motion Hearing.
19. On June 5, 2025, the US Bankruptcy Court issued an oral ruling denying the relief requested in the Motion without prejudice to the Monitor's ability to take any action that it may deem appropriate or necessary upon further investigation into the Water District Sale and the Fossil Creek Sale.
20. On August 8, 2025 the Monitor's US Counsel issued Notices of Examination for Production of Documents pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure and Rule 2004-1 of the Local Rules of Bankruptcy Procedure requesting a response by no later than September 5, 2025 to the following respondents:
 - (a) Bloomfield Homes LP;
 - (b) Tarrant Regional Water District;
 - (c) Secured Title;
 - (d) Hills of Windridge LP; and
 - (e) Trails of Fossil Creek Properties LP.

(collectively, the "**Subpoena Respondents**").
21. As of the date hereof, the Monitor and its Canadian and US Counsel continue to review the document production provided by the Subpoena Respondents for the purpose of evaluating which claims may be asserted in a complaint to be filed in each of the Chapter 11 Cases, including claims to avoid any fraudulent transfers of property to any person, claims for declaratory relief regarding lawful title to any such property, and injunctive relief (as appropriate) to preserve the status quo pending adjudication of those claims.

Regulatory Matters

22. On September 5, 2025, the Monitor received correspondence from The *Autorité des marchés financiers* advising that Angus Manor Park A2A Capital Corp. was in default of Securities Filings pursuant to the Applicable Securities Law.
23. As a result of, among other things, the Debtor Companies dilatory record keeping and lack of cooperation with the Monitor, the Monitor is not certain if any other Debtor Companies or Affiliate

Entities are reporting issuers and, if so, whether they are in compliance with their Securities Filings. Consequently, the Monitor is not in possession of sufficient information from the Debtor Companies to comply with such obligations.

Interim Financing Facility

24. As further detailed in the Eighth Report, on November 19, 2024, the Monitor and Pillar Capital Corp (the “**Interim Lender**”) entered into an interim financing term sheet, as amended, by amendment on December 12, 2024 (collectively, the “**Term Sheet**”).
25. Pursuant the Term Sheet the Interim Lender advanced a credit facility in the maximum amount of \$1,250,000 (the “**Interim Financing Facility**”) to fund these CCAA proceedings.
26. The Interim Financing Facility matures on November 19, 2025

Stay Extension

27. The Stay Period will expire on October 31, 2025.
28. The Monitor requests that the stay of proceedings be extended to January 30, 2026 (the “**Stay Extension**”).
29. In accordance with the terms of the ARIO, the Monitor has been working diligently with its Canadian and US Counsel and Representative Counsel to implement the sale process, gather and review discovery related to the Fossil Creek Sale and Water District Sale in order the advance the Texas Plan, and to prepare the Eighth 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.
30. The requested Stay Extension is required for the following reasons:
 - (a) it will allow the Monitor to continue to take the steps necessary as provided for under the Angus Manor Sale Process;
 - (b) it will allow the Monitor, with the assistance of US Counsel, to continue to advance the Texas Plan including, without limitation, to complete its review of the discovery related the Fossil Creek Sale and Water District Sale and vigorously pursue the necessary litigation that is the subject of the Texas Plan; and
 - (c) the Monitor does not believe any creditor of the Debtor Companies will be materially prejudiced by the proposed Stay Extension.

31. 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.

Exemption from Certain 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 Law.
33. The *Autorité des marchés financiers* has indicated that as a result of Angus Manor Park A2A Capital Corp.'s failure to make certain Securities Filings required by the Applicable Securities Law that a cease trade order will be issued with respect to the securities issued by Angus Manor Park A2A Capital Corp.
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, including Angus Manor Park A2A Capital Corp., to a reporting issuer that is not in default of the Applicable Securities Law 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.

Extension of the Maturity Date of the Interim Financing Facility

35. The Interim Financing Facility matures on November 19, 2025 (the "**Maturity Date**").
36. The Monitor has no ability to repay the Interim Financing Facility on or before the Maturity Date.
37. The Monitor and the Interim Lender have agreed to extend the Maturity Date to such date as may be agreed upon in writing between the Monitor and the Interim Lender to allow for, among other things:
 - (a) the release of the draft Official Plan from the Township of Essa which may result in the rezoning of the Angus Manor Lands which could have a materially positive impact on its potential valuation;
 - (b) definitely resolve outstanding disputes with Debtor Companies, including the Appeals; and
 - (c) advance the Texas Plan to gain control of, and monetize, the Texas Lands and the proceeds of the Fossil Creek Sale and Water District Sale.

Increase to Administration Charge

38. The Monitor is seeking an increase to the Administration Charge from \$2,500,000 to \$3,000,000.
39. It is appropriate for this Honourable Court to exercise its jurisdiction and increase the amount of the Administration Charge, given that:
 - (a) the Debtor Companies and Affiliated Entities consist of a large and intertwined group of companies and entities, formed under the laws of at least two Canadian provinces and the United States, with real property in both countries. The size and complexity of the CCAA Proceedings continues to increase and expand as additional information is provided, new entities and projects are uncovered, and complex corporate governance structures and sale transactions are exposed;
 - (b) the consistent opposition from the management of the Debtor Companies has impacted the Monitor and Representative Counsel's ability to carry out their Court appointed duties in a timely manner resulting in substantial cost;
 - (c) the increase to the Administration Charge is necessary to secure the fees and disbursements the Monitor, Monitor's Counsel and Representative Counsel. All beneficiaries of the Administration Charge (*i.e.*, the Monitor, counsel to the Monitor and Representative Counsel) have contributed, and will continue to contribute, to the restructuring efforts of the Debtor Companies and there is no unwarranted duplication of roles; and
 - (d) the quantum of the charge is fair and reasonable in light of the enhanced powers and responsibilities of the Monitor under the ARIO, and the professional expertise and knowledge required by the Monitor and other beneficiaries of the Administration Charge to successfully navigate these CCAA Proceedings and maximize value for the benefit of all stakeholders.
40. The Monitor is of the view that the proposed increase to the Administration Charge is appropriate and necessary considering the Businesses, Properties, the Monitor's duties, the duties of counsel to the Monitor, and the duties, and necessity for, Representative Counsel.

Increase to Interim Financing Charge

41. The Monitor is seeking an increase to the Interim Financing Charge from \$1,250,00 to \$1,750,000.

42. The increase to the Interim Financing Charge is necessary to account for the anticipated interest and fees associated with the proposed extension of the Maturity Date.
43. Given the circumstances, any prejudice to the stakeholders created by an increase to the Interim Financing Charge is outweighed by the necessity if the Interim Financing Facility for the successful resolution of the Debtor Companies' insolvency.

Approval of the Monitor's Conduct and Activities

44. The Monitor has acted diligently and appropriately since its appointment as Monitor.
45. The actions, conduct and activities of the Monitor as described in the Seventh Report, the First Supplement to the Seventh Report and the Eighth Report are lawful, proper, and consistent with its powers under the ARIO or such other order of this Honourable Court.

Material or evidence to be relied on:

46. Pre-Filing Report of the Proposed Monitor dated November 12, 2024;
47. Consent to Act as Monitor and Receiver executed by a duly authorized representative of A&M, filed November 14, 2024;
48. First Report of the Monitor, dated November 20, 2024;
49. First Supplement to the First Report of the Monitor dated November 21, 2024;
50. Second Supplement to the First Report of the Monitor dated November 25, 2024;
51. Second Report of the Monitor dated November 28, 2024;
52. Third Report of the Monitor dated December 13, 2024;
53. First Supplement to the Third Report of the Monitor dated December 17, 2024;
54. Fourth Report of the Monitor dated February 19, 2025;
55. First Supplement to the Fourth Report of the Monitor dated February 24, 2025;
56. Fifth Report of the Monitor dated April 7, 2025;
57. First Supplement of the Fifth Report of the Monitor dated April 15, 2025;
58. Sixth Report of the Monitor dated June 10, 2025;

- 59. Seventh Report of the Monitor dated July 21, 2025;
- 60. First Supplement to the Seventh Report of the Monitor dated September 15, 2025;
- 61. Eighth Report of the Monitor dated October 17, 2025; 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 Calgary Commercial List before the Honourable Justice Jones.

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**"); and
 - (k) A2A Capital Services Canada Inc. ("**A2A CSC**"),
- (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 July 23, 2025

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SERVICE RECIPIENT	RECIPIENT STATUS	SERVICE VIA
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FRIEDMANS LLP 150 Ferrand Drive, Suite 800 Toronto, ON M3C 3E5 Attention: Bryan Friedman Email: bcf@friedmans.ca	Interested Party	Email

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1.	CANADA REVENUE AGENCY 1-833-697-2390
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SCHEDULE "C"

ORDER

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 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. and A2A CAPITAL SERVICES CANADA 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. and A2A CAPITAL SERVICES CANADA INC.

DOCUMENT **ORDER APPROVING STAY EXTENSION & MISCELLANEOUS RELIEF**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

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Calgary, AB T2P 5C5

E: joliver@cassels.com / dmarechal@cassels.com
P: 403 351 2920 / 403 351 2922

Attention: Jeffrey Oliver / Danielle Marechal

File no. 57100-4

DATE ON WHICH ORDER WAS PRONOUNCED: October 29, 2025

LOCATION WHERE ORDER WAS PRONOUNCED: Calgary, Alberta

JUSTICE WHO MADE THIS ORDER: The Honourable Justice Jones

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., and A2A Capital Services Canada 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 and the Eighth Report of the Monitor dated October 17, 2025 (the "**Eighth Report**"); **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 and the Order granted by the Honourable Justice Neufeld in these proceedings dated June 19, 2025; **AND UPON** reading the Brief of the Monitor filed October 17, 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; **IT IS HEREBY ORDERED AND DECLARED THAT:**

SERVICE OF APPLICATION

1. The time for service of the notice of 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 Eighth Report.

STAY OF PROCEEDINGS

3. The Stay Period is hereby extended until and including January 30, 2026.

EXEMPTION FROM CERTAIN REPORTING OBLIGATIONS

4. 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 as a result of its status as a reporting issuer under any federal or provincial law respecting securities or capital markets in Canada, including, without limitation, the *Securities Act*, RSA 2000, c S-4, *Securities Act*, RSO 1990, c S5, *Securities Act*, RSQ, c V-1 or any other comparable statutes enacted by a province or territory of Canada and the regulations promulgated thereunder, any rules and regulations of any securities regulator, including, without limitation, the Alberta Securities Commission, the Ontario Securities Commission and the *Autorité des marchés financiers*, and other rules, regulations and policies respecting securities or capital markets in Canada (collectively, the “**Applicable Securities Law**”).
5. 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 Applicable Securities Law.

INCREASE TO CHARGES

6. The aggregate amount of the Administration Charge set out in paragraphs 49 of the ARIO is increased from \$2,500,000 to \$3,000,000.
7. The aggregate amount of the Interim Lender’s Charge set out in paragraphs 54 of the ARIO is increased from \$1,250,000 to \$1,750,000.
8. The ARIO shall be and is hereby amended by deleting paragraph 57 thereof and replacing it with new paragraph 57 reading as follows:

57. The priorities of the Administration Charge, and the Interim Lender’s Charge, as among them, shall be as follows:

First – Administration Charge (to the maximum amount of \$250,000);

Second – Interim Lender's Charge (to the maximum amount of \$1,750,000, plus the amount of all interest, fees and expenses in respect of the principal amount advanced under the Term Sheet and/or Definitive Documents).

Third – Administration Charge (to the maximum amount of \$2,750,000);

EXTENSION OF MATURITY OF INTERIM FINANCING FACILITY

9. The Monitor and Pillar Capital Corp. (the “**Interim Lender**”) are authorized and directed to amend the maturity date of the Interim Financing Facility pursuant to the Term Sheet (as defined in paragraph 52 of the ARIO) and pursuant to the Definitive Documents (as defined in paragraph 53 of the ARIO) to such date mutually agreed upon between the Monitor and the Interim Lender (the “**Maturity Date Extension**”).
10. The Monitor, on behalf of the Debtor Companies and Affiliate Entities, is hereby authorized and empowered to execute and deliver such agreements as required to give effect to the Maturity Date Extension defined in paragraph 9 hereto.

APPROVAL OF ACTIVITIES OF MONITOR

11. 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 and the actions, conduct and activities of the Monitor set out therein are approved.

SERVICE AND NOTICE PROTOCOL

12. This Order shall be served upon those parties listed on the Service List by ordinary mail, courier, or electronic transmission. Service is to be deemed in effect by the next business day following transmission or delivery of such documents.
13. The Monitor shall post a copy of this Order to the Monitor's Website for these proceedings: www.alvarezandmarsal.com/a2a.
14. Service of this Order to any other party is hereby dispensed with.

Justice of the Court of King's Bench of Alberta