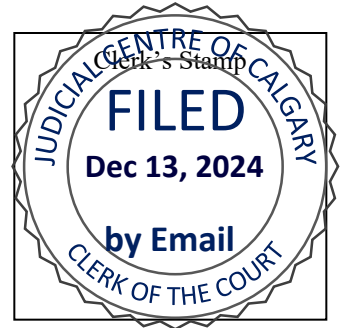


COURT FILE NUMBER 2401-15969
COURT COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY



pp

IN THE MATTER OF THE *COMPANIES' CREDITORS*
ARRANGEMENT ACT, RSC 1985, c C-36, as amended

O120206

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.

DOCUMENT **APPLICATION TO APPOINT CANADIAN
REPRESENTATIVES AND FOR A RESTRICTED COURT
ACCESS ORDER**

APPLICANT **CANADIAN REP COUNSEL on behalf of CANADIAN
INVESTORS (BOTH AS DEFINED IN THE AMENDED
AND RESTATED INITIAL ORDER)**

ADDRESS FOR
SERVICE AND
CONTACT
INFORMATION OF
PARTY FILING
THIS DOCUMENT

Fasken Martineau DuMoulin LLP
Barristers and Solicitors
3400 First Canadian centre
350 – 7th Avenue SW
Calgary, AB, T2P 3N9

Attention: Robyn Gurofsky / Kaitlyn Wong
Telephone: (403)261-9469 / (403)261-7388
Email: rgurofsky@fasken.com / kwong@fasken.com

File No.: 340252.00001

**NOTICE TO THE RESPONDENTS AND SERVICE LIST AT SCHEDULE "A"
ATTACHED HERETO**

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	December 18, 2024
Time	10:00 a.m. MST
Where	Calgary Courts Centre or via WebEx
Before Whom	The Honourable Justice C. Simard

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

Remedy claimed or sought:

1. Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Amended and Restated Initial Order, granted November 25, 2024 (the “ARIO”).
2. Canadian Rep Counsel on behalf of Canadian Investors, seeks:
 - (a) an order appointing three Canadian Investors to act as Canadian Representatives in the within proceedings substantially in the form attached hereto as **Schedule “B”** (the “**Appointment Order**”);
 - (b) a restricted court access order in respect of Confidential Exhibits “A”, “B”, and “C” to Secretarial Affidavit No. 2 of Kim Picard, sworn December 13, 2024 (the “**Second Picard Affidavit**”) substantially in the form attached hereto as **Schedule “C”** (the “**Sealing Order**”); and
 - (c) granting such further and other relief as may be sought by the Applicants and this Honourable Court may deem appropriate.

Grounds for making this application:

Appointment of the Representative Committee

3. Pursuant to paragraph 27 of the ARIO, Canadian Rep Counsel was permitted to commence a process to identify no more than five Canadian Investors to be appointed, pursuant to a further order of this Court, as the Canadian Representatives in the within proceedings.

4. Canadian Rep Counsel, in consultation with the Monitor, is recommending, at this time, that three individuals be appointed as Canadian Representatives. Canadian Rep Counsel has commenced a process to solicit interest amongst Canadian Investors to act as Canadian Representatives and to vet investors who put their names forward. The Canadian Investors whose names are being put forward to the Court are investors in one or more of Angus Manor, Fossil Creek, or Windridge with varying degrees of investment experience and knowledge.
5. Appointment of the proposed three Canadian Investors as Canadian Representatives is necessary for the orderly and efficient representation of Canadian Investors and to work together with Offshore Representatives on behalf of all investors in A2A projects given the large number of investors spread across Canada and the world.

Sealing Order

6. Canadian Rep Counsel seeks a Sealing Order over Confidential Exhibits “A”, “B”, and “C” to the Second Picard Affidavit, on the basis that these Exhibits contain: i) copies of the lists of Canadian Investors in Angus Manor, Fossil Creek, and Windridge provided by the Debtor Companies to the Monitor, ii) an unredacted copy of Canadian Rep Counsel’s internal tracking sheet which lists the names of the Canadian Investors who provided information to Canadian Rep Counsel, and iii) copies of the emails received from the proposed Canadian Representatives containing their personal profiles.
7. Confidential Exhibits “A”, “B”, and “C” contain personal information about Canadian Investors, including contact information, and Canadian Rep Counsel does not have the permission of the Investors to share such information publicly. Publicizing the names and contact information of Canadian Investors may deter Investors from continuing to participate in these proceedings.
8. Sealing Confidential Exhibits “A”, “B”, and “C” is the least restrictive method available to prevent the dissemination of sensitive personal information. The salutary effects of the Sealing Order, which are to protect the general commercial interest of maintaining

confidentiality, far outweigh the deleterious effects of restricting the accessibility of court proceedings.

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

Material or evidence to be relied on:

10. Affidavit No. 2 of Kim Picard, sworn December 13, 2024.
11. Any other materials and pleadings previously filed in the within proceedings.
12. Such further and other material or evidence as counsel may advise and this Honourable Court permits.

Applicable rules:

13. *Alberta Rules of Court*, AR 124/2010, in particular Part 6, Division 4.
14. *Bankruptcy and Insolvency General Rules*, CRC, c 368.
15. Such further and other rules as counsel may advise and this Honourable Court permits.

Applicable Acts and regulations:

16. *Companies' Creditors Arrangement Act*, RSC 1985, c C-36.
17. Such further and other legislation as counsel may advise and this Honourable Court permits.

Any irregularity complained of or objection relied on:

18. None.

How the application is proposed to be heard or considered:

19. The Applicant proposes that this Application be heard before the Honourable Justice Simard on December 18, 2024, at 10:00 a.m. sitting on the Commercial List, via WebEx video conference (and in person if the Court so approves), which appearance has been

scheduled with the Commercial Coordinator, on affidavit evidence with some or all of the parties present.

WARNING

If you do not come to Court either in person or by your lawyer, the Court may give the applicant 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 rely on an affidavit or other evidence when the application is heard or considered, you must reply by giving reasonable notice of the material to the applicant.

SCHEDULE “A”
SERVICE LIST

SCHEDULE "A" – SERVICE LIST

Action No. 2401-15969

Last Update Nov. 29, 2024

SERVICE RECIPIENT	RECIPIENT STATUS	SERVICE VIA
FASKEN MARTINEAU DUMOULIN LLP First Canadian Centre 350 - 7 th Avenue SW, Suite 3400 Calgary, AB T2P 3N9 Attention: Robyn Gurofsky Email: rgurofsky@fasken.com Attention: Kaitlyn Wong Email: kwong@fasken.com Assistant: Kim Picard Email: kpicaard@fasken.com	Representative Counsel to Canadian Investors	Email
NORTON ROSE FULBRIGHT CANADA LLP 400 3 rd Ave SW, Suite 3700 Calgary AB T2P 4H2 Attention: Howard Gorman Email: howard.gorman@nortonrosefulbright.com Attention: Daniel Stethem Email: daniel.stethem@nortonrosefulbright.com	Representative Counsel to Offshore Investors	Email
AZIMUTH RISK MANAGEMENT LTD. 710, 7015 Macleod Trail SW Calgary, AB T2H 2K6 Attention: David Murphy Email: dmurphy@foxbridgegroup.com		Email
PILLAR CAPITAL CORP. Parkside Place Suite 920, 602 – 12th Avenue S.W. Calgary, AB T2R 1J3 Attention: Steve Dizep Email: sdizep@pillarcapitalcorp.com Attention: Rick Lutz Email: rlutz@pillarcapitalcorp.com Attention: Keaton O'Brien Email: kobrien@pillarcapitalcorp.com	Interim Lender	Email
CASSELS Suite 3810, Bankers Hall West 888 3rd Street SW Calgary AB T2P 5C5 Attention: Jeffrey Oliver Email: joliver@cassels.com Attention: Danielle Marechal Email: dmarechal@cassels.com Attention: Natalie Thompson Email: nthompson@cassels.com Attention: Danica Jorgenson Email : djorgenson@cassels.com Assistant: Angeline Gagnon Email: agagnon@cassels.com	Counsel to Alvarez & Marsal Canada Inc.	Email

SERVICE RECIPIENT	RECIPIENT STATUS	SERVICE VIA
TORYS 525 – 8th Avenue S.W., 46th Floor Eighth Avenue Place East Calgary, AB T2P 1G1 Canada Attention: Kyle Kashuba Email: kkashuba@torys.com	Counsel to Pillar Capital, the Interim Lender	Email
REED SMITH LLP 2850 N Harwood St Suite 1500, Dallas, TX 75201, United States Attention: Keith Aurzada Email: KAurzada@reedsmith.com Attention: Michael Cooley Email: mpcooley@reedsmith.com	US Counsel to Alvarez & Marsal Canada Inc.	Email
ALVAREZ & MARSAL CANADA INC. Suite 1110, 250 6 th Ave SW 888 3rd Street SW Calgary AB T2P 3H7 Attention: Orest Konowalchuk Email: okonowalchuk@alvarezandmarsal.com Attention: Duncan MacRae Email: dmacrae@alvarezandmarsal.com	Monitor	Email
METCALFE, BLAINEY & Burns LLP 18 Crown Steel Dr #202 Markham, ON L3R 9X9 Attention: Sammy Lee Email: sammylee@mbb.ca Attention: Jonathan Ku Email: jonathanku@mbb.ca Attention: Stephen Barbier Email: stephenbarbier@mbb.ca	ON Counsel to A2A Group	Email
MILES DAVIDSON LLP 900, 517 – 10 Avenue SW Calgary, AB T2R 0A8 Attention: Daniel Jukes Email: djukes@milesdavidson.com	Co-Counsel with A2A Group ON	Email
ANGUS A2A GP INC. 1600, 333 – 7 th Ave SW Calgary, AB T2P 2Z1 Email: cores@burstall.com	Respondent	Email
ANGUS MANOR PARK A2A GP INC. 1600, 333 – 7 th Ave SW Calgary, AB T2P 2Z1 Email: cores@burstall.com	Respondent	Email

SERVICE RECIPIENT	RECIPIENT STATUS	SERVICE VIA
ANGUS MANOR PARK A2A DEVELOPMENTS INC. 2030 Bristol Circle, 210 Oakville, ON L6H 6P5	Respondent	Courier
HILLS OF WINDRIDGE A2A TRUST Registered and Head office of the trust: 250 Ferrand Drive, Suite 888 Toronto ON M3C 3G8	Respondent	Courier
WINDRIDGE A2A DEVELOPMENTS, LLC c/o Bodkin, Niehaus, Dorris, and Jolley PLLC 111, 6021 Morriss Road Flower Mound TX, 75028 Attention: Nick Lind Email: info@tbtextlaw.com	Respondent	Courier/Email
HILLS OF WINDRIDGE A2A GP INC. 2030 Bristol Circle Oakville, ON L6H 6P5	Respondent	Courier
FOSSIL CREEK A2A GP INC. Suite 900, 744 – 4 Ave SW Calgary, AB T2P 3T4 Email: allan.lind@serenehomes.com	Respondent	Email
FOSSIL CREEK A2A DEVELOPMENTS, LLC c/o Bodkin, Niehaus, Dorris, and Jolley PLLC 111, 6021 Morriss Road Flower Mound TX, 75028 Attention: Nick Lind Email: info@tbtextlaw.com	Respondent	Courier/Email
FOSSIL CREEK A2A TRUST c/o Grayson Ambrose, Trustee Email: grayson@dalcastle.ca	Respondent	Email
A2A DEVELOPMENTS INC. 2030 Bristol Circle, 210 Oakville, ON L6H 6P5	Respondent	Courier
SERENE COUNTRY HOMES (CANADA) INC. c/o Grayson Ambrose, Director Email: grayson@dalcastle.ca	Respondent	Email

SERVICE RECIPIENT	RECIPIENT STATUS	SERVICE VIA
A2A CAPITAL SERVICES CANADA INC. c/o Grayson Ambrose, Director Email: grayson@dalcastle.ca	Respondent	Email
CANADA REVENUE AGENCY Surrey National Verification and Collections Centre 9755 King George Boulevard Surrey BC V3T 5E1 Fax (toll-free): 1-833-697-2390	CRA	Fax
OFFICE OF THE SUPERINTENDENT OF BANKRUPTCY Harry Hays Building 220 4th Ave SE, Suite 478 Calgary AB T2G 4X3 Email: osbservice-bsfservice@ised-isde.gc.ca	OSB	Email
GRAYSON AMBROSE 234 Evanscreek Court NW Calgary, AB T3P 1H4 Email: grayson@dalcastle.ca	Director	Email
LUKE MICHAEL KOK MENG FOO 54 Coronation Rd West #01-01 Singapore 269266, Singapore	Director	Courier
JOSEPH F. ATTRUX 11425 Coburn Hills Pass Fort Worth, TX 76108, USA 2030 Bristol Circle, 210 Oakville, ON L6H 6P5 Email: joe.attrux@rccconsulting.ca	Director and Officer	Email/Courier
ALLAN WHITEFORD LIND 121 Meyer Rd, The Makena #10-08 Singapore, 437932, Singapore 7340 Cascade Court Unit 1122 Forth Worth, TX 76137, USA Email: allan.lind@serenehomes.com	Director and Officer	Email
ANNE LAW 4950 Yonge St, Madison Centre 910 Toronto, ON M2N 6K1	Officer	Courier

SERVICE RECIPIENT	RECIPIENT STATUS	SERVICE VIA
DIRK FOO 121 Meyer Rd, 10-08 Singapore, 437932, Singapore Email: dirk.foo@serenehomes.com	Director	Email
ALEXI OLCHESKI 2011 – 25 th Ave SW Calgary, AB T2T 1A6	Director	Courier
REGISTRAR OF CORPORATION ALBERTA REGISTRIES CORPORATIONS BRANCH John E. Brownlee Bldg 10365 – 97 th St Edmonton, AB T5J 3W7	AB Corporate Registry	Courier
CORPORATIONS CANADA C.D. Howe Building 235 Queen St Ottawa, ON K1A 0H5 Attention: Rui Xiu Li Email: ruixiu.li@ised-isde.gc.ca Attention: Kevin Boyler Email: kevin.boyer@ised-isde.gc.ca	OSB	Email
BUSINESS AND PERSONAL PROPERTY BRANCH 393 University Avenue, Suite 200 Toronto, ON M5G 2M2	ON Business Registry	Courier
BLOOMFIELD HOMES LP 1900 W Kirkwood Blvd. Ste 2300B Southlake, TX 76092	Interested Party	Courier
Marie Lind Email: marie.lind@serenehomes.com	Interested Party	Email

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kpocard@fasken.com
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kobrien@pillarcapitalcorp.com
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dmarechal@cassels.com
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agagnon@cassels.com
kkashuba@torys.com
KAurzada@reedsmith.com
mpcooley@reedsmith.com
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kevin.boyer@ised-isde.gc.ca
dirk.foo@serenehomes.com
allan.lind@serenehomes.com
marie.lind@serenehomes.com

FAX:

1.	CANADA REVENUE AGENCY 1-833-697-2390
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SCHEDULE “B”
FORM OF APPOINTMENT ORDER

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

DOCUMENT **ORDER: APPOINTMENT OF CANADIAN
REPRESENTATIVES**

APPLICANT **CANADIAN REP COUNSEL on behalf of
CANADIAN INVESTORS (BOTH AS DEFINED IN
THE AMENDED AND RESTATED INITIAL
ORDER)**

ADDRESS FOR
SERVICE AND
CONTACT
INFORMATION
OF PARTY
FILING THIS
DOCUMENT **Fasken Martineau DuMoulin LLP**
Barristers and Solicitors
3400 First Canadian centre
350 – 7th Avenue SW
Calgary, AB, T2P 3N9

Attention: Robyn Gurofsky / Kaitlyn Wong
Telephone: (403)261-9469 / (403)261-7388
Email: rgurofsky@fasken.com / kwong@fasken.com

File No.: 340252.00001

DATE ON WHICH ORDER WAS PRONOUNCED: December 18, 2024
LOCATION WHERE ORDER WAS PRONOUNCED: Calgary, Alberta
JUSTICE WHO MADE THIS ORDER: The Honourable Justice C. Simard

UPON the Application of Canadian Rep Counsel on behalf of Canadian Investors seeking an order for the appointment of three Canadian Investors as Canadian Representatives in the within proceedings; **AND UPON** having read the Application of Canadian Rep Counsel, Secretarial Affidavit No. 2 of Kim Picard, sworn December 13, 2024, and the other pleadings and materials previously filed in the within proceedings; **AND UPON** hearing Canadian Rep Counsel, counsel for the Monitor, counsel for the Debtor Companies, Offshore Rep Counsel, and other counsel in attendance at the hearing;

IT IS HEREBY ORDERED AND DECLARED THAT:

1. All defined terms used herein have the meanings ascribed to them in the Amended and Restated Initial Order, granted November 25, 2024 (the “**ARIO**”).
2. Pursuant to paragraph 27 of the ARIO, Michael Edwards, Jerry Storie, and Ron Guina are hereby appointed to act as Canadian Representatives with respect to these CCAA proceedings.
3. The Canadian Representatives, in consultation with Canadian Rep Counsel, are hereby authorized to develop and constitute guidelines in respect of the governance, constitution, matters of procedure, and activities of the Canadian Representatives in these CCAA proceedings and to seek the approval of this Honourable Court in relation to the same.
4. The Canadian Representatives are hereby authorized to represent the Canadian Investors in these CCAA proceedings, including without limitation, for the purposes of settling or compromising claims by the Canadian Investors in the within proceedings and to seek the approval of this Honourable Court in relation to the same.
5. Canadian Rep Counsel is hereby authorized to reapply to this Honourable Court to appoint additional Canadian Representatives where there are fewer than five Canadian Representatives appointed at any given time due to the resignation of any one of the Canadian Representatives, a decision by the Canadian Representatives to remove any one Canadian Representative in accordance with their powers under paragraph 3 of this Order, fewer than five Canadian Representatives being appointed pursuant to this Order, or for any

other reason as Canadian Rep Counsel may advise and this Honourable Court deems just and appropriate.

6. The Canadian Representatives shall have no personal liability or obligations as a result of the performance of their duties in carrying out the provisions of this Order or any further order granted by this Court in respect of being Canadian Representatives, save and except for liability arising out of gross negligence or wilful misconduct. No action or other proceedings may be commenced against the Canadian Representatives, or any one of them, in respect of the performance of their duties under this Order without leave of the Court obtained on 7 days' notice to the Investor Representatives, Canadian Rep Counsel, Offshore Rep Counsel, the Monitor, and the Debtor Companies.
7. Service of this Order shall be deemed good and sufficient by serving the same on:
 - a. the persons listed on the service list created in these proceedings;
 - b. any other person served with notice of the Application for this Order;
 - c. any other parties attending or represented at the Application for this Order; and
 - d. posting a copy of this Order on the Monitor's website at:
<https://www.alvarezandmarsal.com/A2A>,and service on any other person is hereby dispensed with.
8. Service of this Order may be effected by facsimile, electronic mail, personal delivery, or courier. Service is deemed to be effected the next business day following transmission or delivery of this Order.

Justice of the Court of King's Bench of Alberta

SCHEDULE “C”
FORM OF SEALING ORDER

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 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.

DOCUMENT **ORDER: RESTRICTED COURT ACCESS**

APPLICANT **CANADIAN REP COUNSEL on behalf of CANADIAN
INVESTORS (BOTH AS DEFINED IN THE AMENDED AND
RESTATED INITIAL ORDER)**

ADDRESS FOR
SERVICE AND
CONTACT
INFORMATION OF
PARTY FILING THIS
DOCUMENT

Fasken Martineau DuMoulin LLP
Barristers and Solicitors
3400 First Canadian Centre
350 – 7th Avenue SW
Calgary, Alberta T2P 3N9

Attention: Robyn Gurofsky / Kaitlyn Wong
Phone: (403) 261-9469 / (403) 261-9469
Email: rgurofsky@fasken.com / kwong@fasken.com

File Number: 321102.00017

DATE ON WHICH ORDER WAS PRONOUNCED:	December 18, 2024
LOCATION OF HEARING:	Calgary Courts Centre
NAME OF JUSTICE WHO MADE THIS ORDER:	The Honourable Justice C. Simard

UPON the Application of Canadian Rep Counsel on behalf of Canadian Investors seeking
an order sealing Confidential Exhibits “A”, “B”, and “C” to Secretarial Affidavit No. 2 of Kim
Picard, sworn December 13, 2024 (the “**Second Picard Affidavit**”); **AND UPON** having read the

Application of Canadian Rep Counsel, the Second Picard Affidavit, and the other pleadings and materials previously filed in the within proceedings; **AND UPON** hearing Canadian Rep Counsel, counsel for the Monitor, counsel for the Debtor Companies, Offshore Rep Counsel, and other counsel in attendance at the hearing;

IT IS HEREBY ORDERED AND DECLARED THAT:

1. All defined terms used herein have the meanings ascribed to them in the Amended and Restated Initial Order, granted November 25, 2024 (the “**ARIO**”).

SERVICE

2. Service of notice of this Application and materials in support of this Order and the Order for the appointment of Canadian Representatives is hereby declared good and sufficient, and the time for service of this Application and supporting materials is hereby abridged to the time actually given and this Application is properly returnable today.

RESTRICTED COURT ACCESS

3. Confidential Exhibits “A”, “B”, and “C” to the Second Picard Affidavit shall immediately be sealed by the Clerk of the Court, kept confidential and shall not form part of the public record, and not be available for public inspection unless otherwise ordered by this Court.
4. Confidential Exhibits “A”, “B”, and “C” to the Second Picard Affidavit shall be sealed and filed in an envelope containing the following statement thereon:

THIS ENVELOPE CONTAINS CONFIDENTIAL EXHIBITS “A”, “B”, AND “C” TO SECRETARIAL AFFIDAVIT NO. 2 OF KIM PICARD, SWORN DECEMBER 13, 2024, WHICH SHALL BE SEALED ON THE COURT RECORD AND ARE NOT TO BE PLACED ON THE PUBLIC RECORD OR MADE PUBLICLY ACCESSIBLE UNTIL FURTHER ORDER OF THIS COURT.

5. In the event an interested party wishes to unseal the contents of Confidential Exhibits “A”, “B”, and/or “C” to the Second Picard Affidavit, such interested party may bring an

application to Court in the within proceedings on no less than 7 days' notice to the Monitor and Canadian Rep Counsel.

6. Service of this Order shall be deemed good and sufficient by serving the same on:
 - a. the persons listed on the service list created in these proceedings;
 - b. any other person served with notice of the Application for this Order;
 - c. any other parties attending or represented at the Application for this Order; and
 - d. posting a copy of this Order on the Monitor's website at:
<https://www.alvarezandmarsal.com/A2A>,

and service on any other person is hereby dispensed with.

7. Service of this Order may be effected by facsimile, electronic mail, personal delivery, or courier. Service is deemed to be effected the next business day following transmission or delivery of this Order.

Justice of the Court of King's Bench of Alberta