



Court File No. CV-25-00748510-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

THE HONOURABLE

)

FRIDAY, THE 24TH

JUSTICE CAVANAGH

)

DAY OF OCTOBER, 2025

)

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

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF QM GP INC. AND HIGHPOINT
ENVIRONMENTAL SERVICES INC.**

Applicants

ANCILLARY RELIEF ORDER

THIS MOTION, made by QM GP Inc. and Highpoint Environmental Services Inc. (the "**Applicants**", together with QM LP, QMF LP, TWT LP and Quantum Holdings LP, the "**Company**"), pursuant to the *Companies' Creditors Arrangement Act* (Canada) (the "**CCAA**"), for an order, among other things: (a) extending the stay of proceedings until and including January 30, 2026; and (b) sealing Confidential Exhibit "1" to the Affidavit of Ian Grégoire sworn October 17, 2025 (the "**Grégoire Affidavit**") and Confidential Appendix "B" and Confidential Appendix "C" to the Second Report of Alvarez & Marsal Canada Inc. as monitor of the Company (in such capacity, the "**Monitor**") dated October 22, 2025 (the "**Second Report**"), was heard this day by judicial videoconference.

ON READING the Motion Record of the Company, including the Grégoire Affidavit and the Exhibits thereto, and the Second Report, and on hearing the submissions of counsel for the Company, counsel for the Monitor, counsel to Bank of Nova Scotia, the Company's pre-filing senior secured lender, and such other counsel as were present, no one appearing for any other person although duly served as appears from the affidavit of service of Levi Rivers sworn October 20, 2025, as filed,

SERVICE AND DEFINITIONS

1. **THIS COURT ORDERS** that the time for service of the Motion Record of the Applicants dated October 17, 2025 is hereby abridged and validated so that this motion is properly returnable today and hereby dispenses with further service thereof.

2. **THIS COURT ORDERS** that capitalized terms used and not otherwise defined herein shall have the meanings given to them in the Grégoire Affidavit or, if not defined therein, the Second Report or the Amended and Restated Initial Order dated August 7, 2025 (the “**ARIO**”).

EXTENSION OF STAY PERIOD

3. **THIS COURT ORDERS** that the Stay Period is hereby extended until and including January 30, 2026.

4. **THIS COURT ORDERS** that, notwithstanding paragraphs 14 and 15 of the ARIO, the stay related to the Third-Party Indemnity Obligations (as defined in the ARIO) shall be, and is hereby, terminated and of no further force and effect as of the Closing Time (as defined in the Subscription Agreement). For greater certainty, from and after the Closing Time, parties shall be entitled to make any demand, call, or request for payment against third parties that have provided Third-Party Indemnity Obligations on behalf of the Company.

SEALING

5. **THIS COURT ORDERS** that Confidential Exhibit “1” to the Grégoire Affidavit is sealed until the earlier of the Closing of the Transactions or further Order of this Court and that Confidential Appendix “B” and Confidential Appendix “C” to the Second Report are sealed until further Order of this Court.

GENERAL

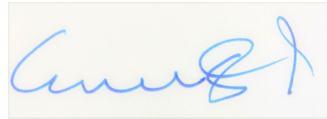
6. **THIS COURT ORDERS** that this Order shall have full force and effect in all provinces and territories in Canada.

7. **THIS COURT HEREBY REQUESTS** the aid and recognition of any Court, tribunal, regulatory or administrative body having jurisdiction in Canada or in the United States of America, or in any foreign jurisdiction, to give effect to this Order and to assist the Company, the Monitor and their respective agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and

to provide such assistance to the Company and to the Monitor, as an officer of this Court, as may be necessary or desirable to give effect to this Order, to grant representative status to the Monitor in any foreign proceeding, or to assist the Company and the Monitor and their respective agents in carrying out the terms of this Order.

8. **THIS COURT ORDERS** that the Company and the Monitor be at liberty and are hereby authorized and empowered to apply to any court, tribunal, regulatory or administrative body, wherever located, for the recognition of this Order and for assistance in carrying out the terms of this Order.

9. **THIS COURT ORDERS** that this Order and all of its provisions are effective as of 12:01 a.m. (Toronto Time) on the date of this Order without any need for entry and filing.



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

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**ONTARIO
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Proceedings commenced at Toronto

ANCILLARY RELIEF ORDER

RECONSTRUCT LLP

80 Richmond Street West
Toronto, ON M5H 2A4

Sharon Kour LSO No. 58328D

skour@reconllp.com

Tel: 416.613.8283

Caitlin Fell LSO No. 60091H

cfell@reconllp.com

Tel: 416.613.8282

Natasha Rambaran LSO No. 80200N

nrambaran@reconllp.com

Tel: 416.587.1439

Julien Gosset LSO No. 93234T

jgosset@reconllp.com

Tel: 437.881.1639

Lawyers for the Applicants