



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

JS
 Dec 18, 2024

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 **SUPPLEMENTAL APPLICATION**

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
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Attention: Robyn Gurofsky / Kaitlyn Wong
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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 restricted court access order substantially in the form attached hereto as **Schedule “B”** which, among other things (the “**Revised Sealing Order**”):
 - (a) authorizes and directs the Clerk of the Court to remove Exhibit A to the Affidavit of Grayson James Ambrose, sworn December 13, 2024 (the “**Second Ambrose Affidavit**”) from the public record;
 - (b) seals Exhibit A to the Second Ambrose Affidavit; and
 - (c) grants such further and other relief as may be sought by the Applicants and this Honourable Court may deem appropriate.

Grounds for making this application:

3. In addition to the relief sought by Canadian Rep Counsel on its Application filed December 13, 2024, Canadian Rep Counsel further seeks a Revised Sealing Order over Exhibit A to the Second Ambrose Affidavit and the removal of Exhibit A from the public record, on the basis that it contains Client Service records of funds raised from Canadian Investors for Angus Manor.
4. Notwithstanding that the Debtor Companies filed Exhibit A to the Second Ambrose Affidavit on the public record, the contents of Exhibit A overlap, in part, with the contents of Confidential Exhibit “A” to Secretarial Affidavit No. 2 of Kim Picard, sworn December

13, 2024 (the “**Second Picard Affidavit**”). Canadian Rep Counsel is seeking a restricted court access order over both Confidential Exhibit “A” to the Second Picard Affidavit and Exhibit A to the Second Ambrose Affidavit as they contain personal information about Canadian Investors, including their full names, contact information, and addresses. Canadian Investors have not consented to the public dissemination of such information.

5. Removing Exhibit A to the Second Ambrose Affidavit from the public record and sealing the same is the least restrictive method available to prevent the dissemination of sensitive personal information. The salutary effects of the Revised 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.
6. Such further and other grounds as counsel may advise and this Honourable Court may permit.

Material or evidence to be relied on:

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

Applicable rules:

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

Applicable Acts and regulations:

14. *Companies’ Creditors Arrangement Act*, RSC 1985, c C-36.

15. Such further and other legislation as counsel may advise and this Honourable Court permits.

Any irregularity complained of or objection relied on:

16. None.

How the application is proposed to be heard or considered:

17. 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
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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
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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.boyler@ised-isde.gc.ca	OSB	Email
BUSINESS AND PERSONAL PROPERTY BRANCH 393 University Avenue, Suite 200 Toronto, ON M5G 2M2	ON Business Registry	Courier
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Marie Lind Email: marie.lind@serenehomes.com	Interested Party	Email

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marie.lind@serenehomes.com;

FAX:

1.	CANADA REVENUE AGENCY 1-833-697-2390
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SCHEDULE “B”

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
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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** the

Supplemental Application of Canadian Rep Counsel on behalf of Canadian Investors seeking an order removing Exhibit A to the Affidavit of Grayson James Ambrose, sworn December 13, 2024 (the “**Second Ambrose Affidavit**”), from the public record and sealing the same; **AND UPON** having read the Application of Canadian Rep Counsel, the Supplemental Application of Canadian Rep Counsel, the Second Picard Affidavit, the Second Ambrose 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, Supplemental 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, Supplemental Application, and supporting materials is hereby abridged to the time actually given and the Application and Supplemental Application are 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. The Clerk of the Court is hereby authorized and directed to immediately remove Exhibit A to the Second Ambrose from the public record.
6. Exhibit A to the Second Ambrose 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.
7. In the event an interested party wishes to unseal the contents of Confidential Exhibits “A”, “B”, and/or “C” to the Second Picard Affidavit or Exhibit A to the Second Ambrose Affidavit, such interested party may bring an application to Court in the within proceedings on no less than 7 days’ notice to the Monitor, Canadian Rep Counsel, and the Debtor Companies.
8. 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.
9. 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