

COURT FILE NUMBER 1803-09581

COURT Court of Queen's Bench of Alberta

JUDICIAL CENTRE Edmonton

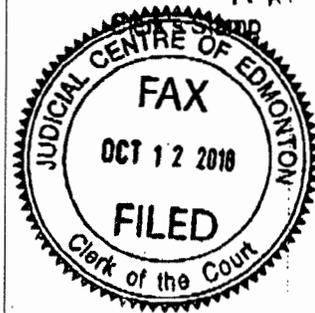
PLAINTIFF BANK OF MONTREAL

DEFENDANTS LADACOR AMS LTD., NOMADS PIPELINE CONSULTING LTD.,
2367147 ONTARIO INC. and DONALD KLISOWSKY

DOCUMENT CASH SECURITY

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT Blake, Cassels & Graydon LLP
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File No.: 99766/12



I hereby certify this to be a true copy of the original.
[Signature]
Clerk of the Court

DATE ON WHICH ORDER WAS PRONOUNCED: October 10, 2018

NAME OF JUDGE WHO MADE THIS ORDER: The Honourable Justice K.G. Neilsen

LOCATION OF HEARING: Edmonton, Alberta

UPON the application of Alvarez & Marsal Canada Inc. in its capacity as the receiver (the "Receiver") of the undertaking, property and assets of Ladacor AMS Ltd., Nomads Pipeline Consulting Ltd. and 2367147 Ontario Inc. (collectively, the "Debtors" and each a "Debtor") for an order to: (i) post certain security for a builders' lien registered against Ladacor AMS Ltd.'s Westgate project; and (ii) directing the Registrar of Land Titles to discharge certain liens;

AND UPON HAVING READ the First Report of the Receiver dated October 2, 2018 (the "First Report"), and such other material in the pleadings and proceedings as deemed necessary;

AND UPON HEARING the submissions of counsel for the Receiver and any other interested parties appearing at the within application;

IT IS HEREBY ORDERED THAT:

1. Service of this Application is hereby abridged, if necessary, and the Application is properly returnable today and any requirement for service of the Application upon any party not served is hereby dispensed with.
2. Pursuant to section 48 of the *Builders' Lien Act*, RSA 2000, c B-7 (the "**Builders' Lien Act**"), the Receiver may pay into Court the amount of \$53,236.34 (inclusive of costs and interest to June 16, 2017) as security (the "**Lien Security**") for the builders' lien claim of Hawk Electric (Northern) Inc. (the "**Lien Claimant**").
3. Upon being provided with a Form 50 (Money Paid Into Court) filed with the Clerk of the Court evidencing the provision of the Lien Security in accordance with this Order, together with a certified copy of this Order, the Registrar of Land Titles shall, pursuant to section 191(3)(a) of the *Land Titles Act*, RSA 2000, c L-4:

- (a) forthwith remove the registrations of the Lien Claimant, registered as Instrument Nos. 172 335 044 (the "**Lien**") and 182 057 147 (the "**Certification of Lis Pendens**"), from the title to the Lands as defined below; and
- (b) forthwith remove the registration of the lien of Hagen Surveys (1982) Ltd., registered as Instrument No. 182 124 615, from the title to the Lands as defined below:

PLAN 5417NY BLOCK 14 LOT 2
EXCEPTING THEREOUT ALL MINES AND MINERALS
AREA: 0.567 HECTARES (1.4 ACRES) MORE OR LESS
ESTATE: FEE SIMPLE, ATS REFERENCE: 4;25;52;34;W
MUNICIPALITY: CITY OF EDMONTON
REFERENCE NUMBER: 962 282 754 (the "**Lands**")

4. The provisions of Section 48(2) of the *Builders' Lien Act* shall apply to the Lien Security.
5. The Lien Security shall be held by the Clerk of the Court pending further Order of this Court respecting the enforcement of the Lien or the handling of the Lien Security.
6. The Lien Claimant or the Receiver is at liberty to make further application to the Court of Queen's Bench in these receivership proceedings, including an application under Section 53 of the *Builders' Lien Act*, for further directions respecting any matter pertaining to the Lien, the Lien Security, or the issues in dispute, including but not limited to:

- (a) the validity of the Lien;
 - (b) the adjustment of the type or amount of the Lien Security or the extent of its application;
 - (c) the discharge of any further liens registered that are related to or duplicative of the Lien;
 - (d) the establishment and calculation of a lien fund; or
 - (e) the enforcement of an award made in any related proceedings.
7. The posting of the Lien Security in accordance with this Order shall not constitute an admission as to the validity of the registration, or the amount of the Lien.
8. Nothing in this Order shall in any way restrict the rights or obligations of the parties under the *Builders' Lien Act* except as expressly stated herein.

J.C.Q.B.A.

A handwritten signature in black ink, appearing to be 'J.C.Q.B.A.', is written over a horizontal line.