

## COURT OF APPEAL OF ALBERTA

COURT OF APPEAL FILE NUMBER: 2101-0004AC

TRIAL COURT FILE NUMBER: 25-2679073

REGISTRY OFFICE: CALGARY

### APPLICANTS

TRAFIGURA CANADA  
GENERAL PARTNERSHIP,  
MCINTYRE PARTNERS and  
GREENFIRE ACQUISITION  
CORPORATION

STATUS ON APPEAL  
STATUS ON APPLICATION

Not a Party to the Appeal  
Applicant

### RESPONDENTS

BEHROKH AZARIAN,  
HOMAYOUN HODAIE,  
MANDANA REZAIE, MEHRAN  
POOLADI-DARVISH, MEYSAM  
OVAICI, FIROOZ  
ABBASZADEH, MEHRAN  
JOOZDANI, LAYLA AMJADI,  
MEER TAHER SHABANI-RAD,  
ZAHRA AHMADINAGHDEHI,  
AFSHIN SHAMELI, MARYAM  
MOHSEN ZADEH, PARHAM  
MINOO, HALEH PEIRAVI,  
MOHAMMAD AHADZADEH  
ARDEBILI, RAMIN JALALPOOR,  
ELHAM VAKILI AZGHANDI,  
TARIQ AHMOOD ROSHAN,  
AMIN JALALPOOR, FAISAL  
KHAN, POONAM DHARMANI  
AND ALI NILFOROUSH

STATUS ON APPEAL  
STATUS ON APPLICATION

Appellant  
Respondent

### NON-PARTIES

GREENFIRE OIL & GAS LTD.,  
GREENFIRE HANGINGSTONE  
OPERATION CORPORATION,  
and ALVAREZ & MARSAL  
CANADA INC., in its capacity as  
PROPOSAL TRUSTEE OF



GREENFIRE OIL & GAS LTD.  
and GREENFIRE  
HANGINGSTONE OPERATING  
CORPORATION

DOCUMENT

**CONSENT ORDER**

ADDRESS FOR SERVICE AND  
CONTACT INFORMATION OF  
PARTY FILING THIS DOCUMENT

**Stikeman Elliott LLP**  
4300 Bankers Hall West  
888 - 3rd Street SW  
Calgary, AB T2P 5C5  
Attention: Karen Fellowes Q.C.  
Phone: (403) 724-9469  
Fax: (403) 266-9034  
File: 118864.1021

---

**DATE ON WHICH ORDER WAS  
PRONOUNCED:**

January 29, 2021

**LOCATION OF HEARING:**

Calgary, Alberta

**NAME OF JUDGE WHO GRANTED  
THIS ORDER:**

Madam Justice M.S. Paperny

---

**UPON NOTING** the consent of counsel for Trafigura Canada General Partnership (“**Trafigura**”); counsel for McIntyre Partners and Greenfire Acquisition Corporation (collectively, “**GAC**”); counsel for Behrokh Azarian, Homayoun Hodaie, Mandana Rezaie, Mehran Pooladi-Darvish, Meysam Ovaici, Firooz Abbaszadeh, Mehran Joozdani, Layla Amjadi, Meer Taher Shabani-Rad, Zahra Ahmadi-Naghdehi, Afshin Shameli, Maryam Mohsen Zadeh, Parham Minoo, Haleh Peiravi, Mohammad Ahadzadeh Ardebili, Ramin Jalalpoor, Elham Vakili Azghandi, Tariq Mahmood Roshan, Amin Jalalpoor, Faisal Khan, Poonam Dharmani and Ali Nilforoush (collectively, the “**Investor Group**”); counsel for Greenfire Oil & Gas Ltd. and Greenfire Hangingstone Operating Corporation; and counsel for Alvarez & Marsal Canada Inc. in its capacity as Proposal Trustee;

**IT IS ORDERED THAT:**

1. Trafigura and GAC are hereby added as a non-party respondents to the Application of the Investor Group for leave to appeal the orders of the Honourable Justice D.B. Nixon, pronounced December 17, 2020 (the “**December**”

**17 Orders**”), scheduled to be heard by this Honourable Court on February 10, 2021 (the “**Leave Application**”);

2. In the event that the Investor Group is successful in its Leave Application, that Trafigura and GAC shall be added as parties to the hearing of the Investor Group’s appeal of the December 17 Orders without further application to this Honourable Court;
3. This Order may be signed in counterpart via facsimile or electronic mail; and
4. There shall be no costs payable for this Order.

  
for: Justice of the Court of Appeal of Alberta  
**Madam Justice M.S. Paperny**

**CONSENTED TO BY:**

**Burnet, Duckworth & Palmer LLP**

**McMillan LLP**

Per: 

**David LeGeyt**

Counsel for Greenfire Oil and Gas Ltd.  
and Greenfire Hangingstone Operating  
Corporation

Per: \_\_\_\_\_

**Adam Maerov**

Counsel for the Proposal Trustee, Alvarez &  
Marsal Canada Inc.

**Torys LLP**

**Field Law LLP**

Per: \_\_\_\_\_

**Kyle Kashuba**

Counsel for McIntyre Partners and  
Greenfire Acquisition Corporation

Per: 

**Douglas S. Nishimura**

Counsel for the Investor Group

**Stikeman Elliott LLP**

Per: \_\_\_\_\_

**Karen Fellowes, Q.C.**

Counsel for Trafigura Canada General  
Partnership

2. In the event that the Investor Group is successful in its Leave Application, that Trafigura and GAC shall be added as parties to the hearing of the Investor Group's appeal of the December 17 Orders without further application to this Honourable Court;
3. This Order may be signed in counterpart via facsimile or electronic mail; and
4. There shall be no costs payable for this Order.

---

Justice of the Court of Appeal of Alberta

**CONSENTED TO BY:**


**Burnet, Duckworth & Palmer LLP**

**McMillan LLP**

Per: \_\_\_\_\_

**David LeGeyt**  
Counsel for Greenfire Oil and Gas Ltd.  
and Greenfire Hangingstone Operating  
Corporation

Per: \_\_\_\_\_

  
**Adam Maerov**  
Counsel for the Proposal Trustee, Alvarez &  
Marsal Canada Inc.

**Torys LLP**

**Field Law LLP**

Per: \_\_\_\_\_

**Kyle Kashuba**  
Counsel for McIntyre Partners and  
Greenfire Acquisition Corporation

Per: \_\_\_\_\_

**Douglas S. Nishimura**  
Counsel for the Investor Group

**Stikeman Elliott LLP**

Per: \_\_\_\_\_

**Karen Fellowes, Q.C.**  
Counsel for Trafigura Canada General  
Partnership

**17 Orders**”), scheduled to be heard by this Honourable Court on February 10, 2021 (the “**Leave Application**”);

2. In the event that the Investor Group is successful in its Leave Application, that Trafigura and GAC shall be added as parties to the hearing of the Investor Group’s appeal of the December 17 Orders without further application to this Honourable Court;
3. This Order may be signed in counterpart via facsimile or electronic mail; and
4. There shall be no costs payable for this Order.

---

Justice of the Court of Appeal of Alberta

**CONSENTED TO BY:**

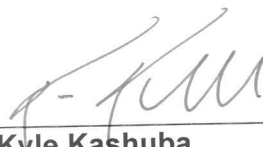
**Burnet, Duckworth & Palmer LLP**

Per: \_\_\_\_\_  
**David LeGeyt**  
Counsel for Greenfire Oil and Gas Ltd.  
and Greenfire Hangingstone Operating  
Corporation

**McMillan LLP**

Per: \_\_\_\_\_  
**Adam Maerov**  
Counsel for the Proposal Trustee, Alvarez &  
Marsal Canada Inc.

**Torys LLP**

Per:  \_\_\_\_\_  
**Kyle Kashuba**  
Counsel for McIntyre Partners and  
Greenfire Acquisition Corporation

**Field Law LLP**

Per: \_\_\_\_\_  
**Douglas S. Nishimura**  
Counsel for the Investor Group

**Stikeman Elliott LLP**

Per: \_\_\_\_\_  
**Karen Fellowes, Q.C.**  
Counsel for Trafigura Canada General  
Partnership

**17 Orders**”), scheduled to be heard by this Honourable Court on February 10, 2021 (the “**Leave Application**”);

2. In the event that the Investor Group is successful in its Leave Application, that Trafigura and GAC shall be added as parties to the hearing of the Investor Group’s appeal of the December 17 Orders without further application to this Honourable Court;
3. This Order may be signed in counterpart via facsimile or electronic mail; and
4. There shall be no costs payable for this Order.

---

Justice of the Court of Appeal of Alberta

**CONSENTED TO BY:**

**Burnet, Duckworth & Palmer LLP**

**McMillan LLP**

Per: \_\_\_\_\_  
**David LeGeyt**  
Counsel for Greenfire Oil and Gas Ltd.  
and Greenfire Hangingstone Operating  
Corporation

Per: \_\_\_\_\_  
**Adam Maerov**  
Counsel for the Proposal Trustee, Alvarez &  
Marsal Canada Inc.

**Torys LLP**

**Field Law LLP**

Per: \_\_\_\_\_  
**Kyle Kashuba**  
Counsel for McIntyre Partners and  
Greenfire Acquisition Corporation

Per: \_\_\_\_\_  
**Douglas S. Nishimura**  
Counsel for the Investor Group

**Stikeman Elliott LLP**

Per:  \_\_\_\_\_  
**Karen Fellowes, Q.C.**  
for Counsel for Trafigura Canada General  
Partnership