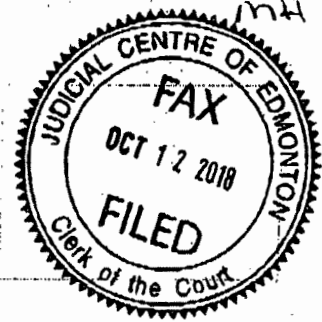


COURT FILE NUMBER 1803-09581
COURT Court of Queen's Bench of Alberta
JUDICIAL CENTRE Edmonton
PLAINTIFF BANK OF MONTREAL

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

DOCUMENT SEALING ORDER

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
Blake, Cassels & Graydon LLP
 Barristers and Solicitors
 3500 Bankers Hall East Tower
 855 - 2 Street SW
 Calgary, Alberta T2P 4J8
Attention: Ryan Zahara / James Reid
 Tel: (403) 260-9628 / (403) 260-9731
 Facsimile: (403) 260-9700
 File No.: 99766/12



I hereby certify this to be a true copy of the original.

[Handwritten signature]

DATE ON WHICH ORDER WAS PRONOUNCED: October 10, 2018
NAME OF JUDGE WHO MADE THIS ORDER: The Honourable Justice K.G. Nielsen
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 sealing confidential appendices 1 and 2 (the "Confidential Appendices") to the First Report of the Receiver dated October 2, 2018 (the "First Report");

AND UPON HAVING READ 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 counsel in attendance at the Application;

IT IS HEREBY ORDERED AND DECLARED THAT:

SERVICE

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.

SEALING

2. Division 4 of Part 6 of the *Alberta Rules of Court*, Alta Reg 124/2010 does not apply.
3. The Confidential Appendices contain confidential and commercially sensitive information, which if made publicly available could be used to the detriment of the parties and these receivership proceedings, and shall be sealed on the Court file, not form part of the public record, and not be available for public inspection unless and until the Receiver files a certificate with this Court confirming the completion of these receivership proceedings (the "**Receiver's Completion Certificate**") or further order by this Court, upon seven days' notice to all interested parties.
4. The Clerk of the Court shall file the Confidential Appendices in a sealed envelope attached to a notice that sets out the style of cause of these proceedings and states that:

THIS ENVELOPE CONTAINS CONFIDENTIAL MATERIALS FILED BY
ALVAREZ & MARSAL CANADA INC.

THE CONFIDENTIAL MATERIALS ARE SEALED UNTIL ALVAREZ &
MARSAL CANADA INC. FILES THE RECEIVER'S COMPLETION
CERTIFICATE OR FURTHER ORDER PURSUANT TO THE SEALING
ORDER ISSUED BY THE HONOURABLE JUSTICE J.T. NIELSON ON
OCTOBER 10, 2018.

5. Leave is hereby granted to any person, entity or party affected by this Order to apply to this Court for a further Order vacating, substituting, modifying or varying the terms of this Order, with such application to be brought on notice to the Receiver and any other affected party in accordance with the *Alberta Rules of Court*, Alta Reg 124/2010 and this Order.

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

J.C.Q.B.A.