

**NOTICE OF DISPUTE**

**IN THE MATTER OF OAK AND FORT CORP., 1282339 B.C. LTD, OAK AND FORT  
US GROUP, INC., OAK AND FORT ENTERPRISE (U.S.), INC., NYM MERGER  
HOLDINGS LLC, AND OAK AND FORT CALIFORNIA, LLC**

This Notice of Dispute must be read together with the Claims Process Order (the “**Claims Process Order**”) of the Supreme Court of British Columbia granted on July 4, 2025.

A copy of the Claims Process Order is available at <https://www.ksvadvisory.com/experience/case/oakandfort>. All capitalized terms not otherwise defined have the same meanings as are given to them in the Claims Process Order.

Pursuant to the Claims Process Order, notice is hereby given to you that the undersigned Claimant intends to dispute the Notice of Revision or Disallowance bearing Reference Number \_\_\_\_\_ and dated \_\_\_\_\_ issued by the Monitor in respect of the below-referenced Claim.

**Full Legal Name of Creditor:** \_\_\_\_\_

Type of Claim	Applicable Debtor	As Submitted (specify currency)	Revised Claim as Accepted (\$CAD)	
			Secured	Unsecured
Pre-Filing Claim (Not D&O Claim)		\$	\$	\$
D&O Claim		\$	\$	\$
Restructuring Claim		\$	\$	\$

**Reasons for Dispute:** *[attach additional sheet and copies of all supporting documentation if necessary]:*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Signature of Claimant or Representative of Corporate Claimant:** \_\_\_\_\_

**Date:** \_\_\_\_\_

[Please print name]: \_\_\_\_\_

Telephone Number: (\_\_\_\_) \_\_\_\_\_

Email Address: \_\_\_\_\_

Full Mailing Address:

\_\_\_\_\_  
\_\_\_\_\_

Your complete Notice of Dispute must be delivered to the court-appointed Monitor in PDF format within 10 days (before 4:00 p.m.) after the date of delivery of the Notice of Revision or Disallowance (or such date as agreed to by the Monitor) at the following address:

**KSV Restructuring Inc.**, in its capacity as the Court-Appointed CCAA Monitor of Oak and Fort Corp., 1282339 B.C. Ltd., Oak and Fort US Group, Inc., Oak and Fort Enterprise (U.S.), Inc., NYM Merger Holdings LLC, and Oak and Fort California, LLC

220 Bay Street, Suite 1300  
Toronto ON M5J 2W4

Attention: Roni Levit  
Phone: 416-932-6021  
Email: oakandfort@ksvadvisory.com

In addition to delivering this Notice of Dispute to the Monitor you MUST, within 15 days after the date of the Notice of Dispute (or such other date as may be agreed to by the Monitor or ordered by the Court) file and serve on the O&F Entities and the Monitor (and if the disputed Claim includes a D&O Claim, the applicable Director or Officer) a Notice of Application seeking to appeal the Notice of Revision or Disallowance, along with all supporting affidavit material.

<p><b>IF YOU DO NOT DELIVER A NOTICE OF DISPUTE BY THE TIME SPECIFIED, OR DO NOT FILE AND SERVE A NOTICE OF APPLICATION SEEKING TO APPEAL THE NOTICE OF REVISION OR DISALLOWANCE BY THE DATE SPECIFIED, THE NATURE AND AMOUNT OF YOUR CLAIM, IF ANY, SHALL BE AS SET OUT IN THIS NOTICE OF REVISION OR DISALLOWANCE.</b></p>
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