

No. S-254287  
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,  
RSC 1985, c C-36, as amended

and

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

PETITIONERS

**ORDER MADE AFTER APPLICATION**  
**(Stay Extension and Financing Approval)**

BEFORE THE HONOURABLE MADAM )  
JUSTICE FITZPATRICK ) NOVEMBER 20, 2025  
)

**ON THE APPLICATION** of the Petitioners coming on for hearing by Microsoft Teams at Vancouver, British Columbia, on this 20<sup>th</sup> day of November, 2025; **AND ON HEARING** Lisa Hiebert and Tiffany Bennett, counsel for the Petitioners, and those other counsel listed on **Schedule "A"** hereto; **AND UPON HAVING READ** the application material filed, including the Sixth Affidavit of Min Gyoung Kang affirmed November 17, 2025 (the "**Sixth Kang Affidavit**"), and the Fourth Report of the Monitor dated November 17, 2025; **AND PURSUANT TO** the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "**CCAA**"), the *Supreme Court Civil Rules* and the inherent jurisdiction of this Honourable Court;

**THIS COURT ORDERS AND DECLARES THAT:**

1. The time for service of the Notice of Application for this order and the materials filed in support is hereby abridged such that this application is properly returnable today, and further service upon any interested party other than those parties on the service list maintained in these proceedings is hereby dispensed with.

## DEFINED TERMS

2. All capitalized terms not otherwise defined in this Order shall have the definitions set out in the Second Amended and Restated Initial Order made July 4, 2025 (the “SARIO”).

## STAY EXTENSION

3. The Stay Period, granted by paragraph 17 of the SARIO, is hereby extended up to and including February 2, 2026 or such later date as this Court may subsequently order.

## APPROVAL OF INSURANCE PREMIUM FINANCING

4. The Petitioners’ proposed insurance premium financing, on substantially the same terms as set out at paragraph 31 of the Sixth Kang Affidavit, is hereby approved. The Petitioners (or any one or a combination of them) are hereby authorized, but not required, to enter into one or more Continuous Premium Instalment Contracts (each a “PIC”) with CAFO Inc. (“CAFO”), pursuant to which CAFO shall provide financing to the applicable Petitioner(s) for the purpose of purchasing one or more policies of insurance (the “**Financed Policies**”).

5. In the event of a default of payment under any PIC, CAFO shall be permitted, without further order of this Court, and notwithstanding the stay of proceedings set out in the SARIO, as may be amended from time to time, to exercise its contractual rights pursuant to the said PIC to cancel the Financed Policies and to receive any unearned premiums (“**Unearned Premiums**”) which may be refunded by the insurers as a result of the same.

6. Notwithstanding any provision of the SARIO, this Order, or any other Order granted in the within proceedings, none of the Directors’ Charge, the Administration Charge, the Interim Lender’s Charge and the Intercompany Charge, or any Encumbrance existing as of the date hereof or any further charges, or encumbrances which may come to exist, is applicable to the Unearned Premiums.

## GENERAL PROVISIONS

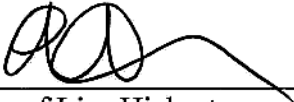
7. THIS COURT REQUESTS the aid and recognition of other Canadian and foreign Courts, tribunals, and regulatory or administrative bodies, including any court or administrative tribunal of any federal or State Court or administrative body in the United States of America, to act in aid of and to be complementary to this Court in carrying out the terms of this Order where required. All courts, tribunals, and regulatory and administrative bodies are hereby respectfully

requested to make such orders and to provide such assistance to the Petitioners and to the Monitor, as an officer of this Court, as may be necessary or desirable to give effect to this Order, or to assist the Petitioners and the Monitor and their respective agents in carrying out the terms of this Order.

8. The Petitioners are hereby granted leave to schedule the hearing of its next application before this Court to be heard on November 28, 2025 at 9:00 a.m. for one (1) hour via Microsoft Teams.

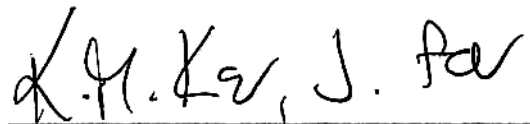
9. Endorsement of this Order by counsel appearing on this application, other than counsel for the Petitioners, is hereby dispensed with.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT:



Signature of Lisa Hiebert,  
Lawyer for the Petitioners

BY THE COURT



REGISTRAR



**Schedule "A"**  
**Appearance List**

<b>Counsel Name</b>	<b>Party Represented</b>
Jesse Mighton and Andrew Froh	The Monitor, KSV Restructuring Inc.
Douglas B. Hyndman	Business Development Bank of Canada
Katherine Griffin	The Interim Lender (Klaus Lam, Bo Ra Kim, Min-Seon Scott Park, Bear and Otter Holdings Ltd., and Min Kang)
Gina Rhodes	Westfield Group