



FORCE FILED

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

NOTICE OF APPLICATION

Name of applicants: The Petitioners, 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 (collectively, the "**O&F Group**").

To: The Service List, a copy of which is attached hereto as **Schedule "A"**

TAKE NOTICE that an application will be made by the applicants to Madam Justice Fitzpatrick at the courthouse at 800 Smithe Street, Vancouver, British Columbia (by MS Teams) on **Thursday, November 20, 2025 at 9:00 a.m.** for the order set out in Part 1 below.

The applicants estimate that the application will take 1 hour.

X This matter is not within the jurisdiction of an associate judge. Madam Justice Fitzpatrick is seized of these proceedings and the date and time of this application has been set with Scheduling.

Part 1 ORDERS SOUGHT

1. The Petitioners seek an Order (the "**Stay Extension and Financing Approval Order**") substantially in the form attached as **Schedule "B"** that, among other things:

- (a) approves the terms of proposed insurance premium financing (the "**Premium Financing**") to be provided by CAFO Inc. ("**CAFO**"), and authorizing the Company to enter into definitive agreements in connection with the Premium Financing; and

- (b) extends the stay period in respect of the O&F Group under the CCAA to and including February 2, 2026.

2. The Petitioners may also seek such further and other relief as counsel may advise and this Honourable Court may permit.

Part 2 FACTUAL BASIS

3. Capitalized terms not otherwise defined herein have the meanings ascribed to them in the Affidavit No. 6 of Min Gyoung Kang, to be filed (the “**Sixth Kang Affidavit**”), or the Second Amended and Restated Initial Order dated July 4, 2025 (the “**SARIO**”).

Overview

4. On June 6, 2025, the Petitioners were granted protection under the CCAA pursuant to an initial order of the Court. As part of the Initial Order, KSV Restructuring Inc. was appointed as Monitor. The Petitioners subsequently sought and obtained an Amended and Restated Initial Order on June 16, 2025 and a SARIO on July 4, 2025, the latter of which extended the Stay Period to and including October 3, 2025.

5. In addition, on July 4, 2025, the Court approved a Claim Process Order (the “**CPO**”), pursuant to which the Court approved a process to identify and quantify claims to be addressed as part of the Petitioners’ restructuring efforts.

6. On October 3, 2025, the Court granted an order extending the Stay Period to and including November 21, 2025.

7. Since their last appearance before this Court on October 3, 2025, the Petitioners, with the assistance of their legal counsel and the Monitor, have been and are continuing to act in good faith and with due diligence to maximize value for their stakeholders and respond to their concerns. In particular, the Petitioners have taken steps and activities to advance their restructuring and assist the Monitor in administering the Claims Process (as defined in the CPO), further discussions and negotiations of the terms of proposed debt and equity investments, and commenced preparation on the terms of a proposed consolidated plan of arrangement and compromise, for which the

Petitioners intend to seek a meeting order from this Court at a subsequent application in the near term.

8. These steps and activities are described in greater detail in the Sixth Kang Affidavit and include, among other things:

- (a) engaging with vendors, suppliers, landlords and other stakeholders regarding the CCAA Proceedings, the Claims Process, the O&F Group's business during these proceedings, the formulation of a turnaround plan, and various other matters;
- (b) diligently monitoring forecasted and actual sales and collections, and forecasted and actual operating expenses and payments, in order to manage cash flow and conserve capital, and reporting to the Interim Lender as required under the Interim Financing Facility;
- (c) in consultation with the Monitor, reviewing Proof of Claim Forms (as defined in the CPO) received in connection with the Claims Process in order to determine whether to accept, revise or reject the claims set forth therein;
 - (i) with the assistance of its financial advisor, preparing financial analyses and presentations, and engaging in discussions with potential investors for both debt and equity financing to support the O&F Group's emergence plan;
 - (ii) engaging in ongoing discussions with certain landlords with a view of optimizing the O&F Group's retail presence and lease terms; and
 - (iii) on the basis of the expected turnaround financing, the O&F Group is preparing a plan of arrangement and compromise and has engaged in informal discussions with certain stakeholders to determine the overall level of support for the anticipated plan.

9. In particular, the O&F Group, together with its financial advisor and legal counsel, have been working diligently to negotiate the terms of third party financing and investments to facilitate the plan or provide for the O&F Group's post-emergence working capital needs. The plan, if implemented, allow the O&F Group to emerge from these proceedings as a going concern. The

O&F Group's discussions with the contemplated investors are advanced, and efforts to finalize the definitive agreements are ongoing.

10. The O&F Group is also continuing to operate and manage the business in the ordinary course, and addressing issues as they arise, including but not limited to engaging in ongoing discussions with suppliers in preparation for the holiday season, which is typically the busiest time for the retail industry, including the Petitioners.

Approval of Insurance Premium Financing

11. The Petitioners' commercial insurance policy (including D&O insurance and cyber insurance) was renewed effective on November 6, 2025, with a total renewal premium of \$183,746.00, of which approximately \$153,531.00 ("**Renewal Premium**") relates to the Canadian policy. Consistent with past practice, coverage includes general commercial liability (up to \$5,000,000), property insurance, and cyber security insurance. The Renewal Premium is due and payable on December 6, 2025, and is not yet paid.

12. Consistent with past practice, the Petitioners have requested from WCI payments by monthly installments and insurance premium financing. At CAFO's request as a financing condition, the Petitioners seek this Court's approval of insurance premium financing, to be by CAFO, on certain terms as detailed in the Sixth Kang Affidavit.

13. The Petitioners understand, based on information provided by WCI, that CAFO will review, and expects to approve, O&F's credit application once the Petitioners have obtained approval from the Court to enter into a financing agreement on the following terms:

- (d) under the terms of the Premium Financing, which shall be set out in one or more Continuous Premium Instalment Contracts (each "**PIC**") to be entered into between the Petitioners (or one or any combination of them) and CAFO, CAFO will advance funds sufficient to pay the entirety of the Renewal Premium due on December 6, 2025 to ensure policy continuance;
- (e) the applicable Petitioner(s) shall pay monthly installment payments in respect of the Premium Financing;

- (f) as a condition precedent to the Premium Financing, the applicable Petitioner(s) shall pay a one-time sum in advance of loan disbursement, representing 35% of the Renewal Premium (approximately \$53,736.00), with the balance of the amount (\$99,795.00) to be paid in seven monthly installments;
- (g) as a condition precedent to CAFO's approval of the Premium Financing, the Petitioners shall have obtained an Order from the Court which approves and the following terms in respect of the Premium Financing that:
 - (i) in the event of a default of payment under a PIC, CAFO shall be permitted, without further Order of the Court and notwithstanding the stay of proceedings set out in the SARIO or any other Order of the Court in these proceedings, to exercise its rights under the PIC to cancel the financed policies and to receive any unearned premiums which may be refunded by the insurers as a result (the "Unearned Premiums"); and
 - (ii) the Unearned Premiums shall be unencumbered by any existing or future CCAA Charges or Encumbrances (as defined in the SARIO).

14. The Monitor is supportive of the proposed financing for insurance premiums on the terms set out above.

Extension of the Stay Period

15. The O&F Group seeks an extension of the Stay Period to February 2, 2026 (the "**Stay Extension**"), which is necessary and appropriate in the circumstances in order to provide the O&F Group time to continue its efforts to implement a restructuring strategy, which efforts will include:

- (a) negotiating, finalizing, and executing definitive documents in connection with the proposed debt and equity investments;
- (b) advance negotiations with stakeholders and provide information to stakeholders in connection with the anticipated plan; and
- (c) finalize the plan of arrangement and compromise, with a view to seeking a Meeting Order at the earliest opportunity.

16. The O&F Group will also continue to carry on business in the ordinary course during this time.

17. The Monitor supports the contemplated Stay Extension.

Part 3 LEGAL BASIS

18. The Petitioners rely on the following:

- (a) the *CCAA*;
- (b) *Supreme Court Civil Rules* of British Columbia;
- (c) the inherent and equitable jurisdiction of this Honourable Court; and
- (d) such further and other legal basis as counsel may advise and this Honourable Court may allow.

Approval of Insurance Premium Financing

19. Pursuant to paragraph 9 of the SARIO, the Petitioners are entitled to pay, among other ordinary course business expenses, “all expenses and capital expenditures reasonably incurred and which are necessary for the preservation of the Property or the Business including, without limitation, payments on account of insurance (including directors and officers’ insurance) [...], provided that any capital expenditure shall be approved by the Monitor.”

20. The Petitioners seek insurance premium financing to make monthly premium payments in the ordinary course, consistent with their past practice, in order to provide sufficient liquidity and flexibility in their cash flow as they prepare to present the Plan to creditors. As further detailed in the Sixth Kang Affidavit, the proposed premium financing lender, CAFO, requires as a condition to the requested financing this Court’s direction that, in the event of the Petitioners’ default under the terms of the applicable definitive agreements, CAFO would be permitted to cancel the insurance policies and retain any unearned premiums refunded by the insurer (the “**Unearned Premiums**”), which shall not be encumbered by existing or future *CCAA* Charges or Encumbrances.

21. The Petitioners state that the contemplated insurance premium financing and the requested exclusion of the Unearned Premiums from the *CCAA* Charges and Encumbrances, as described in

the Sixth Kang Affidavit and set out in the form of Stay Extension and Financing Approval Order, are fair and reasonable in the circumstances. These arrangements are consistent with the Petitioners' past practice, form part of the Petitioners' ordinary course business expenses and, importantly, do not prejudice existing creditors or beneficiaries of the *CCAA* Charges as the alternative would require up-front funding.

Extension of the Stay Period

22. This Honourable Court's Order of October 3, 2025 provides for a stay of proceedings to and including November 21, 2025.

23. Pursuant to the section 11.02(2) of the *CCAA*, the Court may extend this initial stay period for any period that the Court considers necessary provided that (a) the extension sought is appropriate in the circumstances; and (b) the Petitioners have acted and are acting in good faith and with due diligence. In determining whether it is appropriate to extend a stay of proceedings, courts consider whether doing so will advance the remedial purpose of the *CCAA*.

CCAA, ss 11.02(2), 11.02(3); *North American Tungsten Corp (Re)*, 2015 BCSC 1376 at paras 25-29.

24. As summarized above at paragraphs 8 and 9, since the issuance of this Court's Order for stay extension, the O&F Group has acted and continues to act in good faith and with diligence to advance its restructuring. Among other things, the Petitioners expect to use the time to finalize their plan of arrangement and compromise and seek a meeting order. Accordingly, the proposed extension will further the Petitioners' restructuring efforts and is in the best interests of stakeholders.

25. If Stay Extension is granted by this Court, the Petitioners are expected to have sufficient liquidity to meet their obligations and carry on business operations at least through the proposed extension period without the need for further borrowing under the Interim Financing Facility.

26. The Petitioners submit that the Stay Extension is reasonable and appropriate in the circumstances, and necessary to enable the O&F Group to continue to pursue its restructuring plan.

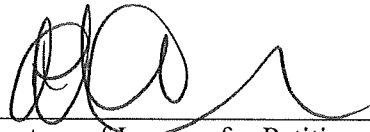
Part 4 MATERIAL TO BE RELIED ON

- 27. The Affidavit No. 6 of Min Gyoung Kang made November 17, 2025; and
- 28. The Fourth Report of the Monitor, to be filed.
- 29. Such further and other materials as counsel may advise and this Honourable Court may permit.

TO THE PERSONS RECEIVING THIS NOTICE OF APPLICATION: If you wish to respond to this Notice of Application, you must, within 5 business days after service of this Notice of Application or, if this application is brought under Rule 9-7, within 8 business days after service of this Notice of Application,

- (a) file an Application Response in Form 33,
- (b) file the original of every affidavit, and of every other document, that
 - (i) you intend to refer to at the hearing of this application, and
 - (ii) has not already been filed in the proceeding, and
- (c) serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:
 - (i) a copy of the filed Application Response;
 - (ii) a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on that person;
 - (iii) if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7(9).

Dated: November 17, 2025



Signature of Lawyer for Petitioners,
Lisa Hiebert/Tiffany Bennett

To be completed by the court only:

Order made

☐ in the terms requested in paragraphs of Part 1 of
this Notice of Application

☐ with the following variations and additional terms:

.....
.....
.....

Date:

.....
Signature of ☐ Judge ☐ Associate
Judge

The Solicitors for the Petitioners are Fasken Martineau DuMoulin LLP, whose office address and address for delivery is 550 Burrard Street, Suite 2900, Vancouver, BC V6C 0A3 Telephone: +1 604 631 4977 / +1 403 261 5355 E-mail: lhiebert@fasken.com / tbennett@fasken.com (Reference: Lisa Hiebert / 329904.00020)

APPENDIX

THIS APPLICATION INVOLVES THE FOLLOWING:

- ☐ discovery: comply with demand for documents
- ☐ discovery: production of additional documents
- ☐ other matters concerning document discovery
- ☐ extend oral discovery
- ☐ other matter concerning oral discovery
- ☐ amend pleadings
- ☐ add/change parties
- ☐ summary judgment
- ☐ summary trial
- ☐ service
- ☐ mediation
- ☐ adjournments
- ☐ proceedings at trial
- ☐ case plan orders: amend
- ☐ case plan orders: other
- ☐ experts
- ☒ none of the above

SCHEDULE "A"

SERVICE LIST

(See attached.)

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

SERVICE LIST

(As at September 25, 2025)

Monitor's Website: <https://www.ksvadvisory.com/experience/case/oakandfort>

<p>Fasken Martineau DuMoulin LLP 2900 – 550 Burrard Street Vancouver, BC V6C 0A3</p> <p>Attention: Kibben Jackson Lisa Hiebert Tiffany Bennett</p> <p>Email: kjackson@fasken.com lhiebert@fasken.com tbennett@fasken.com svolkow@fasken.com jbeaulieu@fasken.com</p> <p><i>Counsel for the Petitioners</i></p>	<p>KSV Restructuring Inc. 220 Bay Street, Suite 1300 Toronto, ON M5J 2W4</p> <p>Attention: Noah Goldstein Murtaza Tallat Dean Perlman</p> <p>Email: ngoldstein@ksvadvisory.com mtallat@ksvadvisory.com dperlman@ksvadvisory.com</p> <p><i>The Monitor</i></p>
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<p>Bennett Jones LLP 2500 Park Place, 666 Burrard Street Vancouver, BC V6C 2X8</p> <p>Attention: Sean Zweig Jesse Mighton Andrew Froh</p> <p>Email: zweigs@bennettjones.com mightonj@bennettjones.com froha@bennettjones.com morenoe@bennettjones.com</p> <p><i>Counsel for the Monitor</i></p>	<p>McCarthy Tétrault LLP Suite 2400, 745 Thurlow Street Vancouver, BC V6E 0C5</p> <p>Attention: Lance Williams Jenna Clark Ashley Bowron</p> <p>Email: lwilliams@mccarthy.ca jkrclark@mccarthy.ca abowron@mccarthy.ca sdanielisz@mccarthy.ca</p> <p><i>Counsel for the DIP Lenders</i></p>
<p>Secured Creditors</p>	
<p>Business Development Bank of Canada 1133 Melville Street, Suite 1500 Vancouver, BC V6E 4E5</p> <p>Attention: Sundeep Sihota</p> <p>Email: sundeep.sihota@bdc.ca</p>	<p>Kornfeld LLP 1100 One Bentall Centre 505 Burrard Street, Box 11 Vancouver, BC V7X 1M5</p> <p>Attention: Douglas Hyndman</p> <p>Email: dhyndman@kornfeldllp.com</p> <p><i>Counsel for Business Development Bank of Canada</i></p>

Royal Bank of Canada 36 York Mills Road, 4th Floor Toronto, ON M2P 0A4	MCM Law LLP The Hive 401 - 121 5th Avenue Kamloops, BC V2C 0M1 Attention: Jennifer Cockbill Email: jennifer@mcmlaw.ca lisa@mcmlaw.ca Stephaniec@mcmlaw.ca <i>Counsel for Royal Bank of Canada</i>
Shopify Inc. 151 O'Connor Street, Ground Floor Ottawa, ON K2P 2L8 Attention: Laura Staszkiel Email: laura.staszkiel@shopify.com bankruptcies-insolvencies@shopify.com	Blake, Cassels & Graydon LLP 199 Bay Street Suite 4000, Commerce Court West Toronto, ON M5L 1A9 Attention: Chris Burr Email: chris.burr@blakes.com <i>Counsel for Shopify Inc.</i>
De Lage Landen Financial Services Canada Inc. 5046 Mainway, Unit 1 Burlington, ON L7L 5Z1	Ford Credit Canada Leasing PO Box 2400 Edmonton, AB T5J 5C7
Landlords	
Torys LLP 79 Wellington St. W. 30th Floor (deliveries) / 33rd Floor (reception) Box 270, TD South Tower Toronto, ON M5K 1N2 Attention: David Bish Email: dbish@torys.com <i>Counsel for Cadillac Fairview</i>	Camelino Galessiere LLP 65 Queen Street West Suite 440 Toronto, ON M5H 2M5 Attention: Linda Galessiere Email: lgalessiere@cglegal.ca <i>Counsel for Ivanhoé Cambridge (JLL) and Morguard</i>

<p>Whitelaw Twining 2400 - 200 Granville Street Vancouver, BC V6C 1S4</p> <p>Attention: John Fiddick</p> <p>Email: jfiddick@wt.ca</p> <p><i>Counsel for Low Tide Properties Ltd.</i></p>	<p>Miller Thomson LLP Scotia Plaza 40 King Street West, Suite 6600 Toronto, ON M5H 3S1</p> <p>Attention: Gregory Azeff Gina Rhodes Jaclyn Tarola</p> <p>Email: gazeff@millerthomson.com grhodes@millerthomson.com jtaraola@millerthomson.com</p> <p><i>Counsel for Unibail Rodamco Westfield Group, Westfield LLC, Westfield Management LLC, Century City Mall, LLC, and V F Mall, LLC</i></p>
<p>Cassels Brock & Blackwell LLP Suite 2200, RBC Place 885 West Georgia Street Vancouver, BC V6C 3E8</p> <p>Attention: Vicki Tickle</p> <p>Email: vtickle@cassels.com</p> <p><i>Counsel for 7 East 6th Avenue Holdings Ltd.</i></p>	
<p>Unsecured Creditors</p>	
<p>Gowling WLG (Canada) LLP One Main Street West Hamilton, ON L8P 4Z5</p> <p>Attention: Chris Heinemann</p> <p>Email: christoph.heinemann@gowlingwlg.com</p> <p><i>Counsel for China Export and Credit Insurance Corporation and Suzhou Hengrun Import & Export Corp., Ltd.</i></p>	<p>Langlois Lawyers LLP 2820, boul. Laurier, 13e étage Québec QC G1V 0C1</p> <p>Attention: Amélie Breton</p> <p>Email: amelie.breton@langlois.ca</p> <p><i>Counsel for GardaWorld</i></p>

High Fashion Garments International Company Ltd 11/F, High Fashion Centre 1-11 Kwai Hei Street, Kwai Chung New Territories, Hong Kong Attention: Diane Ma Email: DianeMa@highfashion.com.hk	Amex Bank of Canada PO Box 3204 STN F Toronto, ON M1W 3W7 Attention: Waseem Nanji Email: Waseem.Nanji@aexp.com
Government Entities	
Canada Revenue Agency Surrey National Verification and Collection Centre 9755 King George Boulevard Surrey, BC V3T 5E1 Tel: 1-866-891-7403 Fax: 1-833-697-2389	Department of Justice Canada British Columbia Regional Office 900 - 840 Howe Street Vancouver, BC V6Z 2S9 Attention: Aminollah Sabzevari Jessica Ko Email: aminollah.sabzevari@justice.gc.ca jessica.ko@justice.gc.ca mariam.assadi@justice.gc.ca
Ministry of Attorney General PO Box 9280 Stn Prov Govnt Victoria, BC V8W 9J7 Email: AGLSBRevTaxInsolvency@gov.bc.ca	

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SCHEDULE "B"

DRAFT ORDER

(See attached.)

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)

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

ON THE APPLICATION of the Petitioners coming on for hearing at Vancouver, British Columbia, on this 20th day of November, 2025; **AND ON HEARING** Lisa Hiebert, 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 [●]; **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. 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

Counsel Name	Party Represented
Jesse Mighton and Andrew Froh	The Monitor, KSV Restructuring Inc.
Douglas B. Hyndman	Business Development Bank of Canada