



No. S-228723
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c.
C-36

AND

IN THE MATTER OF THE *BUSINESS CORPORATIONS ACT*, S.B.C. 2002, c. 57

AND

IN THE MATTER OF THE PLAN OF COMPROMISE AND ARRANGEMENT OF
PURE GOLD MINING INC.

PETITIONER

NOTICE OF APPLICATION

Name of applicant: Pure Gold Mining Inc. ("Pure Gold")

To: The Service List

TAKE NOTICE that an application will be made by Pure Gold to the Honourable Justice Walker at 800 Smithe Street, Vancouver, British Columbia on May 10, 2023 at 9:00 a.m. for the orders set out in Part 1 below.

Part 1: ORDERS SOUGHT

1. Pure Gold seeks the following orders on this application:
 - (a) a Stay Extension Order, substantially in the form attached as **Schedule "A"** extending the stay of proceedings in these *Companies' Creditors Arrangement Act* ("**CCAA**") proceedings from May 12, 2023, until June 16, 2023; and
 - (b) a Post-Filing Director/Officer Claims Process Order, substantially in the form attached as **Schedule "B"**, which will permit Pure Gold and KSV Restructuring Inc., in its capacity as court-appointed "**Monitor**" to Pure Gold, to call for and assess all post-filing claims against Pure Gold's directors and officers (the "**Post-Filing Director/Officer Claims Process**").
2. Pure Gold also seeks such other relief as counsel may advise and as this Court may deem appropriate.

Part 2: FACTUAL BASIS

Update on Pure Gold's Restructuring Efforts

3. Pure Gold was granted protection under the CCAA on October 31, 2022. Since that time it has been working diligently towards its restructuring goals, including with the assistance of its Court-approved "**Sales Agent**" and in consultation with the Monitor and "**Sprott**", Pure Gold's senior secured lender, interim (DIP) lender in these proceedings, and largest creditor.

4. The current stay of proceedings expires on May 12, 2023. Pure Gold requires an extension of the stay of proceedings in order to continue its good faith efforts towards implementation of its restructuring objectives.

5. Most notably, Pure Gold's efforts to maximize value for its assets have resulted in a binding letter agreement among Pure Gold, West Red Lake Gold Mines Ltd. ("**WRLG**") and Sprott for the acquisition by WRLG of all of Pure Gold's issued and outstanding shares (the "**Transaction**"). The terms of the Transaction are described in greater detail in Affidavit #1 of Jonathan Singh, made May 4, 2023.

6. Pure Gold is currently working with WRLG, Sprott, the Monitor, and their advisors to prepare the definitive documentation required to effect the Transaction. It anticipates seeking Court approval of the Transaction through a reverse vesting order structure in the coming weeks. It requires an extension of the stay of proceedings to allow it to take these necessary steps.

7. In addition to its efforts with respect to the Transaction, Pure Gold's continuing restructuring efforts have included the following:

- (a) operating its mine on a care and maintenance basis;
- (b) implementing the "Site Employee Retention Plan" that was approved by this Court on March 30, 2023 to assist to retain Pure Gold's key on-site employees;
- (c) working to ensure a smooth transition in Pure Gold's management following recent departures;
- (d) engaging with stakeholders including secured creditors, unsecured creditors, suppliers, the government and employees;
- (e) engaging with the Monitor and the Sales Agent;
- (f) engaging with consultants and considering technical matters; and
- (g) complying with its reporting obligations and other requirements under applicable court orders.

The Proposed Stay Extension

8. Pure Gold's restructuring efforts to date have benefitted from the "breathing room" provided by this Court's granting of a stay of proceedings, which has been extended on numerous occasions since the granting of the Initial Order. Given the status of its restructuring efforts, including the Transaction that it is working to complete with WRLG, Pure Gold continues to require a stay of proceedings and the other protections afforded by this Court's orders.

9. In the circumstances, Pure Gold is requesting that the stay of proceedings be extended from May 12, 2023 until June 16, 2023. The stay extension will afford Pure Gold the opportunity to, among other things, continue advancing the Transaction, including taking the necessary steps towards obtaining court approval of and, if approved, closing the Transaction.

10. Pure Gold is expected to have sufficient cash available through to June 16, 2023, without having to seek an increase of its current interim lending facility provided by Sprott.

The Proposed Director/Officer Post-Filing Claims Process

11. In light of the progress made in Pure Gold's restructuring to date and the anticipated application to this Court to approve the Transaction, it is Pure Gold's view, in consultation with, and with the support of the Monitor and Sprott, that it is appropriate for Pure Gold to undertake a limited claims process with respect to post-filing claims against its directors and officers at this time.

12. The Post-Filing Director/Officer Claims Process is intended to call for and adjudicate (as necessary) post-filing claims against Pure Gold's directors and officers only. It will require all claimants wishing to assert such claims to submit a "Post-Filing Director/Officer Claim Form" to the Monitor no later than the "Claims Bar Date" of June 12, 2023. All submitted claims will then be adjudicated by the Monitor pursuant to standard procedures in a claims process.

13. As is discussed in greater detail below, running this limited claims process at this time will help create certainty as to the realm of post-filing claims that may exist against Pure Gold's directors and officers.

Part 3: LEGAL BASIS

The Stay of Proceedings Should be Extended

14. A stay of proceedings is the "central tool" by which this Court maintains the status quo for a debtor company, allowing it the necessary time, flexibility, and "breathing room" to carry out a supervised restructuring or organized sales process while continuing its ongoing operations.

1057863 B.C. Ltd. (Re), 2022 BCSC 876, paras. 31, 35 [1057863], citing Timminco Limited (Re), 2012 ONSC 2515, para. 15.

15. The baseline considerations and requirements for a stay extension are that a stay is "appropriate" and that the debtor company subject to the CCAA is acting in good faith and with due diligence.

CCAA, ss. 11.02(2)-(3).

16. In the present case, Pure Gold has been acting in good faith and with due diligence in these CCAA proceedings.

17. The proposed stay extension is necessary to maintain the status quo as Pure Gold pursues its restructuring efforts, including Court approval and closing of the Transaction, for the benefit of its stakeholders.

18. The Monitor and Sprott are supportive of the relief sought in the Stay Extension Order.

The Post-Filing Director/Officer Claims Process Should be Approved

19. Claims process orders are common practice in CCAA proceedings. The jurisdiction to grant a claims process order arises from section 11 of the CCAA, which provides this Court with broad statutory authority to make such orders as are necessary to achieve the remedial objectives of the CCAA, provided they are “appropriate in the circumstances”.

***Quest University Canada (Re)*, 2020 BCSC 1845 at para. 21 [*Quest University*]; *Bul River Mineral Corporation (Re)*, 2014 BCSC 1732 at paras. 29-32 [*Bul River*]; *Soccer Express Trading Corp. (Re)*, 2020 BCSC 749 at para. 106 [*Soccer Express*].**

20. There are “no set rules” for the contents of a claims process order, but the overarching objective is to obtain certainty as to quantum and validity of the prospective claims that may be made against a debtor company.

***Soccer Express* at paras. 108-109; *Bul River* at para. 32; *Quest University* at para. 29**

21. Additional considerations include whether:

- (a) the process and timelines in the proposed claims process are fair, reasonable, and designed with some idea of the issues that either have arisen or might arise in the restructuring;
- (b) the proposed order allows for the usual steps and procedures, consistent with what has previously been approved in other restructurings; and
- (c) the Monitor supports approval of the proposed claims process order.

***Bul River* at para. 32; *Soccer Express* at paras. 107-108**

22. This Post-Filing Director/Officer Claims Process will provide Pure Gold with certainty as to the realm of post-filing claims, if any, that may be asserted against its directors and officers.

23. Running this limited claims process at this time will help to avoid or reduce delays in any distribution of proceeds that may occur following the closing of the Transaction, including by placing Pure Gold in a position to seek the Court’s approval of a reduction or elimination of the \$650,000 “D&O Charge” created under the Initial Order.

24. The Monitor and Sprott are supportive of approval of the Post-Filing Director/Officer Claims Process.

25. The terms of the proposed Post-Filing Director/Officer Claims Process are fair and reasonable. Implementing the Post-Filing Director/Officer Claims Process at this time is appropriate and prudent in the circumstances.

Part 4: MATERIAL TO BE RELIED ON

1. Affidavit #1 of Jonathan Singh, made May 4, 2023;
2. Fifth Report of the Monitor, to be filed; and
3. Such other and further materials as counsel for Pure Gold may advise.


Pure Gold estimates that the application will take one hour.

This matter is not within the jurisdiction of a master. Justice Walker is seized of the matter.

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).

Date: May 4, 2023

FOR: 
Signature of Peter L. Rubin
Lawyer for Pure Gold Mining Inc.

Blake, Cassels & Graydon LLP
Barristers and Solicitors
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595 Burrard Street PO Box 49314
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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 Master

APPENDIX

THIS APPLICATION INVOLVES THE FOLLOWING:

- discovery: comply with demand for documents
- discovery: production of additional documents
- 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

SCHEDULE "A" TO NOTICE OF APPLICATION

No. S-228723
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT, R.S.C. 1985, c.
C-36

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AND

IN THE MATTER OF THE PLAN OF COMPROMISE AND ARRANGEMENT OF
PURE GOLD MINING INC.

PETITIONER

ORDER MADE AFTER APPLICATION

BEFORE) THE HONOURABLE JUSTICE WALKER) May 10, 2023
)))

ON THE APPLICATION of the petitioner, Pure Gold Mining Inc. ("**Pure Gold**") coming on for hearing at Vancouver, British Columbia on the 10th day of May 2023; AND ON HEARING Peter Rubin and Claire Hildebrand, counsel for Pure Gold, and those other counsel listed on Schedule "A" hereto; AND UPON READING the materials filed, including Affidavit #1 of Jonathan Singh, affirmed May 4, 2023 and the Fifth Report of KSV Restructuring Inc. (in its capacity as court-appointed monitor of Pure Gold (the "**Monitor**")) dated May [], 2023; AND pursuant to the *Companies' Creditors Arrangement Act*, RSC 1985 c. C-36, as amended, the *British Columbia Supreme Court Civil Rules*, and the inherent jurisdiction of this Honourable Court;

THIS COURT ORDERS AND DECLARES that:

1. The Stay Period (as defined in paragraph 13 of the Amended and Restated Initial Order of this Court pronounced on November 9, 2022) is hereby extended until and including June 16, 2023.
2. Endorsement of this Order by counsel appearing on this application other than counsel for Pure Gold 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 Peter Rubin
Lawyer for Pure Gold Mining Inc.

BY THE COURT.

Registrar

Schedule "A"

Counsel Name	Party Represented
Kibben Jackson	KSV Restructuring Inc.
Colin Brousson	Sprott Private Resource Lending II (Collector), LP, Sprott Private Resource Lending II (CO), Inc., and Sprott Resource Lending Corp.

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IN THE MATTER OF THE PLAN OF COMPROMISE
AND ARRANGEMENT OF
PURE GOLD MINING INC.

PETITIONER

ORDER MADE AFTER APPLICATION

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Peter Rubin
Agent: Dye & Durham

SCHEDULE "B" TO NOTICE OF APPLICATION

No. S-228723
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c.
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IN THE MATTER OF THE PLAN OF COMPROMISE AND ARRANGEMENT OF
PURE GOLD MINING INC.

PETITIONER

ORDER MADE AFTER APPLICATION

(POST-FILING DIRECTOR/OFFICER CLAIMS PROCESS ORDER)

BEFORE THE HONOURABLE)
JUSTICE WALKER) May 10, 2023

ON THE APPLICATION of Pure Gold Mining Inc. ("**Pure Gold**") coming on for hearing at 800 Smithe Street, Vancouver, British Columbia on the 10th day of May, 2023; AND ON HEARING Peter L. Rubin and Claire Hildebrand, counsel for Pure Gold, and those other counsel listed on **Schedule "A"** hereto; AND UPON READING the materials filed, including Affidavit #1 of Jonathan Singh, affirmed May 4, 2023 and the Fifth Report of KSV Restructuring Inc. (in its capacity as court-appointed monitor of Pure Gold (the "**Monitor**")) dated May [--], 2023 ; AND pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985 c. C-36, as amended (the "**CCAA**"), the British Columbia *Supreme Court Civil Rules*, BC Reg 168/2009 and the inherent jurisdiction of this Honourable Court;

THIS COURT ORDERS AND DECLARES THAT:

DEFINITIONS, TIME, AND CURRENCY DENOMINATION

1. All capitalized terms not otherwise defined in this Post-Filing Director/Officer Claims Process Order shall have the definitions set out in **Schedule “B”** hereto.
2. All references herein as to time shall mean local time in Vancouver, British Columbia, Canada, any reference to an event occurring on a Business Day shall mean prior to 4:00 p.m. on such Business Day unless otherwise indicated herein, and any event that occurs on a day that is not a Business Day shall be deemed to occur on the next Business Day.
3. Any Claims denominated in a currency other than Canadian Dollars shall be converted into Canadian Dollars at the applicable Bank of Canada exchange rates published on the Filing Date.

POST-FILING DIRECTOR/OFFICER CLAIMS PROCESS

Post-Filing Director/Officer Claims Process Approved

4. The Post-Filing Director/Officer Claims Process set out herein, including the Claims Bar Date, is hereby approved.
5. As soon as reasonably practicable, Pure Gold shall publish the Press Release with respect to this Post-Filing Director/Officer Claims Process on its website and on SEDAR and publish a notice with respect to this Post-Filing Director/Officer Claims Process in the Northern Miner and the Monitor shall post a copy of this Post-Filing Director/Officer Claims Process Order on the Monitor's Website.

Post-Filing Director/Officer Claims

6. Any Post-Filing Director/Officer Claimant that wishes to assert a Claim must submit a Post-Filing Director/Officer Claim Form to the Monitor in the manner set out in paragraph 25 hereof so that the Post-Filing Director/Officer Claim Form is received by the Monitor no later than the Claims Bar Date. Failure to submit a Post-Filing Director/Officer Claim Form to the Monitor by the Claims Bar Date will result in such Post-Filing Director/Officer Claimant's Claim being forever barred and extinguished and, for greater certainty, such

Post-Filing Director/Officer Claimant will be forever prohibited from making or enforcing a Post-Filing Director/Officer Claim against Pure Gold's Directors or Officers.

Adjudication of Claims

7. If a Post-Filing Director/Officer Claimant delivers a Post-Filing Director/Officer Claim Form in accordance with the Post-Filing Director/Officer Claims Process set out herein, the Monitor, in consultation with Pure Gold, and, as the Monitor may deem appropriate, any Director or Officer against whom a Post-Filing Director/Officer Claim is asserted or their counsel, will either:
 - (a) accept the Claim set out in such Post-Filing Director/Officer Claim Form in its entirety;
 - (b) revise the amount, secured status, or priority of the Claim set out in the Post-Filing Director/Officer Claim Form for voting and distribution purposes; or
 - (c) disallow the Claim set out in the Post-Filing Director/Officer Claim Form in its entirety for voting and distribution purposes.
8. Pure Gold and the Monitor may request any further documentation from a Post-Filing Director/Officer Claimant that Pure Gold or the Monitor may require to enable them to consider and determine the validity of a Claim.
9. If the Monitor, in consultation with Pure Gold, and, as the Monitor may deem appropriate, any Director or Officer against whom a Claim is asserted or their counsel, disallows a Claim or disputes the amount, secured status, or priority of the Claim set out in a Post-Filing Director/Officer Claim Form the Monitor, in consultation with Pure Gold, and, as the Monitor may deem appropriate, any Director or Officer against whom a Claim is asserted or their counsel, shall, no later than 30 Business Days after the Claims Bar Date send a Notice of Revision or Disallowance to the Post-Filing Director/Officer Claimant advising that the Post-Filing Director/Officer Claimant's Claim as set out in its Post-Filing Director/Officer Claim Form has been revised or disallowed and the reasons therefor. If the Monitor does not send a Notice of Revision or Disallowance to a Post-Filing Director/Officer Claimant by such date, the Claim as set out in the applicable Post-Filing Director/Officer Claim Form shall be a Proven Claim (unless otherwise provided in a subsequent order of this Court).

10. Any Post-Filing Director/Officer Claimant who is sent a Notice of Revision or Disallowance pursuant to paragraph 9 hereof and who wishes to dispute such Notice of Revision or Disallowance must:
 - (a) within ten Business Days after the date of delivery of the applicable Notice of Revision or Disallowance, or such other date as may be agreed to by the Monitor, in consultation with Pure Gold, deliver a completed Notice of Dispute of Revision or Disallowance to the Monitor in accordance with paragraph 25 hereof; and
 - (b) within 15 Business Days after the date of delivery of the applicable Notice of Revision or Disallowance, or such other date as may be agreed to by the Monitor in consultation with Pure Gold, or this Court may order, file and serve on Pure Gold, the Monitor and the applicable Director or Officer, a Notice of Application seeking to appeal the Notice of Revision or Disallowance, along with all supporting affidavit material. Any appeal from a Notice of Revision or Disallowance shall proceed as a hearing *de novo*, and the parties may adduce evidence in respect of the Claim not previously included in connection with Director/Office Claim Form or in connection with the corresponding Notice of Revision or Disallowance.

11. If a Post-Filing Director/Officer Claimant who is sent a Notice of Revision or Disallowance pursuant to paragraph 9 hereof fails to deliver a Notice of Dispute of Revision or Disallowance and a Notice of Application in accordance with paragraph 10 hereof, then, subject only to further order of this Court, the Claim shall be deemed accepted at the amount, secured status, and priority set forth in the Notice of Revision or Disallowance, if any, and the Post-Filing Director/Officer Claimant will:
 - (a) if the entire Claim is disallowed:
 - (i) not be entitled to attend any creditors' meeting or vote on any Plan if one is filed on account of such Claim;
 - (ii) not be permitted to participate in any distribution authorized by the Court in these proceedings or receive any other distributions or consideration under any Plan if one is filed on account of any such Claim;
 - (iii) not be entitled to receive any further notice in respect of the Post-Filing Director/Officer Claims Process; and

- (iv) be forever barred and enjoined from asserting or enforcing any Claim against any of Pure Gold's Directors or Officers, and all such Claims shall be forever barred and extinguished; and
- (b) where the Claim has been revised:
- (i) possess a Proven Claim in the amount, secured status and priority of such revised Claim;
 - (ii) only be entitled to vote on any Plan if one is filed to the extent of the amount, secured status, or priority of such revised Claim;
 - (iii) only be entitled to receive any distribution authorized by the Court in these proceedings or any distributions or other consideration under any Plan if one is filed in an amount proportionate to the revised amount and in accordance with any revised security status or priority of such Claim; and
 - (iv) be forever barred and enjoined from asserting or enforcing any Claim (A) greater than the revised amount, or (B) with a different security status or priority against Pure Gold's Directors and/or Officers.
12. The Claims Bar Date and the amount and status of every Proven Claim as determined under the Post-Filing Director/Officer Claims Process, including any determination as to the nature, amount, value, priority or validity of any Claim, shall be final for all purposes including in respect of any Plan and voting thereon (unless otherwise provided for in any subsequent order of this Court), and for any distribution made or consideration provided to Post-Filing Director/Officer Proven Creditors, whether in these CCAA Proceedings or in any of the proceedings authorized by this Court or permitted by statute, including a receivership proceeding, an arrangement proceeding or a bankruptcy affecting Pure Gold.

NOTICE OF TRANSFEREES

13. If the holder of a Claim has transferred or assigned all or part of such Claim to another Person, neither Pure Gold nor the Monitor shall be obligated to give notice or otherwise deal with the transferee or assignee of such Claim in respect thereof unless and until actual written notice of such transfer or assignment, together with satisfactory evidence of such transfer or assignment, has been received and acknowledged in writing by the Monitor. Subject to further order of this Court, any transferee or assignee of a Claim: (i)

shall for the purposes of the Post-Filing Director/Officer Claims Process be bound by any notices given or steps taken in respect of such Claim in accordance with the Post-Filing Director/Officer Claims Process prior to receipt and acknowledgement by the Monitor of satisfactory evidence of such transfer or assignment; (ii) takes the Claim subject to any defences or rights which Pure Gold may have in respect thereof, including any claim with respect to which the affected Director or Officer may be entitled. For greater certainty: (i) a transferee or assignee of a Claim is not entitled to set-off, apply, merge, consolidate or combine any Claims assigned or transferred to it against or on account or in reduction of any amounts owing by any Director or Officer; and (ii) Claims acquired by a transferee or assignee will not merge, consolidate or combine with any of the transferee's or assignee's other Claims.

14. Reference to a transfer in this Post-Filing Director/Officer Claims Process Order includes a transfer or assignment whether absolute or intended as security.

THE MONITOR

15. The Monitor shall, in conjunction with Pure Gold and, as the Monitor may deem appropriate, any Director or Officer against whom a Claim is asserted or their counsel, review the Post-Filing Director/Officer Claim Forms submitted by Post-Filing Director/Officer Claimants. The Monitor shall provide Pure Gold or its counsel, as well as any Director or Officer against whom a Claim is made, or their counsel, with copies of all Post-Filing Director/Officer Claim Forms submitted by Post-Filing Director/Officer Claimants and any other documents delivered to the Monitor pursuant to the Post-Filing Director/Officer Claims Process.
16. The Monitor is hereby authorized to use reasonable discretion as to the adequacy of compliance with respect to the way Post-Filing Director/Officer Claim Forms delivered hereunder are completed and executed and the time by which they are submitted and may waive strict compliance with the requirements of this Post-Filing Director/Officer Claims Process Order.
17. Copies of any Post-Filing Director/Officer Claim Forms delivered by or to a Post-Filing Director/Officer Claimant shall be maintained by the Monitor and, upon written request, the Monitor shall provide such Post-Filing Director/Officer Claimant with a copy of a Post-Filing Director/Officer Claim Form.

18. The Monitor, in addition to its prescribed rights, duties, responsibilities and obligations under the CCAA and under the ARIO, shall assist with the implementation and administration of the Post-Filing Director/Officer Claims Process, including the determination of Claims of Post-Filing Director/Officer Claimant, and is hereby directed and empowered to take such other actions and fulfill such other roles as are contemplated by this Post-Filing Director/Officer Claims Process Order.
19. The Monitor: (i) in carrying out its obligations under this Post-Filing Director/Officer Claims Process Order, shall have all of the protections given to it by the CCAA and the ARIO, and as an officer of this Court, including the stay of proceedings in its favour; (ii) shall incur no liability or obligation as a result of the carrying out of its obligations under this Post-Filing Director/Officer Claims Process Order, save and except in the event of any gross negligence or wilful misconduct on the part of the Monitor; (iii) shall be entitled to rely on the books and records of Pure Gold, and any information provided by Pure Gold, all without independent investigations; and (iv) shall not be liable for any claims or damages resulting from any errors or omissions in such books, records, or information.
20. Notwithstanding anything to the contrary herein, the Monitor may at any time:
 - (a) refer a Claim for resolution to this Court for any purpose where in the Monitor's discretion, in consultation with Pure Gold and, as the Monitor may deem appropriate, any Director or Officer against whom a Claim is asserted or their counsel, such a referral is preferable or necessary for the resolution or the valuation of the Claim;
 - (b) in writing, accept the amount of a Claim for voting and/or distribution purposes without prejudice to the right of Pure Gold or any affected Director or Officer to later contest the validity or amount of such Claim;
 - (c) settle and resolve any disputed Claims in writing; and
 - (d) extend the time period within which the Monitor, a Post-Filing Director/Officer Claimant, a Post-Filing Director/Officer Proven Creditor, or any other party is required to take any steps related to adjudication of Claims pursuant to this Director/Officer Claims Process Order, including without limitation the time period set out in paragraph 9 for delivery by the Monitor of a Notice of Revision or Disallowance to a Post-Filing Director/Officer Claimant, the time period set out in

paragraph 10 for delivery of a Notice of Application seeking to appeal a Revision or Disallowance and supporting affidavit material by a Post-Filing Director/Officer Claimant or a Post-Filing Director/Officer Proven Creditor, and the time period for any response of the Monitor, Pure Gold, or a Director or Officer, as the case may be, to a Notice of Application seeking to appeal a Revision or Disallowance and supporting affidavit material, provided that no extension of time by the Monitor with respect to the adjudication of Claims pursuant to this section or otherwise shall impact a Post-Filing Director/Officer Claimant's obligation to deliver a Post-Filing Director/Officer Claim Form to the Monitor pursuant to paragraph 6 or the application of the Claims Bar Date to any Post-Filing Director/Officer Claimant.

CLAIMS OFFICER

21. The Monitor or Pure Gold are hereby authorized and shall be at liberty to bring an application in these proceedings seeking an order of this Court appointing a Claims Officer in respect of any and all disputed Claims on such terms that the Monitor or Pure Gold may consider reasonable in the circumstances.

SERVICE AND NOTICES

22. Each of the:
- (a) Post-Filing Director/Officer Claims Process Instruction Letter attached as **Schedule "C"**;
 - (b) Post-Filing Director/Officer Claim Form attached as **Schedule "D"**;
 - (c) Notice of Revision or Disallowance attached as **Schedule "E"**;
 - (d) Notice of Dispute of Revision or Disallowance attached as **Schedule "F"**; and
 - (e) Press Release attached as **Schedule "G"**;

are hereby approved in substantially the forms attached. Despite the foregoing, Pure Gold or the Monitor may make amendments to such forms as they consider necessary or desirable, provided such amendments do not materially alter the substance of said forms.

23. Publication of the Press Release on the website of Pure Gold and on SEDAR, publishing a notice in the Northern Miner with respect to the Post-Filing Director/Officer Claims

Process, posting of the Post-Filing Director/Officer Claims Process Order on the Monitor's Website and serving it on the Service List in these proceedings, and completion of the other requirements of this Post-Filing Director/Officer Claims Process Order shall constitute good and sufficient service and delivery of notice of a Post-Filing Director/Officer Claimant's Claim, this Post-Filing Director/Officer Claims Process Order, the Post-Filing Director/Officer Claims Process, and the Claims Bar Date on all Persons, and no other notice or service need be given or made and no other document or material need be sent to or served upon any Person in respect of this Post-Filing Director/Officer Claims Process Order or the Post-Filing Director/Officer Claims Process.

24. Pure Gold and the Monitor may, unless otherwise specified by this Post-Filing Director/Officer Claims Process Order, serve and deliver any letters, notices or other documents including the Claims Process Forms to Post-Filing Director/Officer Claimants, Post-Filing Director/Officer Proven Creditors, or any other Person by forwarding copies thereof by prepaid ordinary mail, courier, personal delivery or email to such Persons at their respective addresses or contact information as last shown on the records of Pure Gold or set out in a Claims Process Form. Any such service and delivery shall be deemed to have been received by a Post-Filing Director/Officer Claimant or a Post-Filing Director/Officer Proven Creditor: (i) if sent by ordinary mail, on the third Business Day after mailing within British Columbia, the fifth Business Day after mailing within Canada (other than within British Columbia), and the seventh Business Day after mailing internationally; (ii) if sent by courier or personal delivery, on the next Business Day following dispatch; and (iii) if delivered by email by 4:00 p.m. on a Business Day, on such Business Day, and if delivered after 4:00 p.m. or other than on a Business Day, on the following Business Day.
25. Any Claims Process Forms required to be provided or delivered by a Post-Filing Director/Officer Claimant or a Post-Filing Director/Officer Proven Creditor to the Monitor under this Post-Filing Director/Officer Claims Process Order, shall be in writing in substantially the form, if any, provided for in this Post-Filing Director/Officer Claims Process Order and will be sufficiently given only if delivered by prepaid registered mail, courier, personal delivery, facsimile transmission, or email addressed to:

KSV Restructuring Inc.
In its capacity as Monitor of
Pure Gold Mining Inc.

220 Bay Street, 13th Floor, PO Box 20,
Toronto, Ontario, M5J 2W4
Attn: Christian Vit
Telephone: 416.932.6262
Fax: 416.932.6266
Email: cvit@ksvadvisory.com

26. Any Court materials required to be served on Pure Gold under this Post-Filing Director/Officer Claims Process Order should be served on Pure Gold's counsel as follows:

Blake, Cassels & Graydon LLP
Barristers and Solicitors

Suite 2600, Three Bentall Centre
595 Burrard Street, PO Box 49314
Vancouver, BC V7X 1L3
Attn: Claire Hildebrand
Email: claire.hildebrand@blakes.com/ vancouver.service@blakes.com

27. Any notice or communication sent by a Post-Filing Director/Officer Claimant or a Post-Filing Director/Officer Proven Creditor shall be deemed to be received upon actual receipt thereof by the Monitor or Pure Gold before 4:00 p.m. (Vancouver time) on a Business Day or, if delivered after 4:00 p.m. (Vancouver time) or other than on a Business Day, on the next Business Day.
28. If, during any period in which notice or other communications are being given or sent pursuant to this Post-Filing Director/Officer Claims Process Order, a postal strike or postal work stoppage of general application should occur, such notice or other communications sent by ordinary or prepaid registered mail and then not received shall not, absent further order, be effective and notices and other communications given hereunder during the course of any such postal strike or work stoppage of general application shall only be effective if given by courier, personal delivery, facsimile transmission or email in accordance with this Post-Filing Director/Officer Claims Process Order.
29. In the event this Post-Filing Director/Officer Claims Process Order is later amended by further order of the Court, the Monitor shall post such further order on the Monitor's Website and Pure Gold or the Monitor may serve such further order on the Service List and such posting and service shall constitute adequate notice to Post-Filing Director/Officer Claimants or Post-Filing Director/Officer Proven Creditors of the amendments made.

MISCELLANEOUS

30. All Claims of Post-Filing Director/Officer Claimants shall be proven in accordance with the procedures outlined herein and in the Claims Process Instruction Letter. In the event of any discrepancy between this Post-Filing Director/Officer Claims Process Order and the Claims Process Instruction Letter, this Post-Filing Director/Officer Claims Process Order shall govern.
31. Notwithstanding any other provisions of this Post-Filing Director/Officer Claims Process Order, the delivery by Pure Gold or Monitor of any Claims Process Forms contemplated by this Post-Filing Director/Officer Claims Process Order, and the filing by any Person of any Claims Process Forms shall not, for that reason alone, grant any Person standing in these proceedings or rights under any Plan if one is filed.
32. Notwithstanding the terms of this Post-Filing Director/Officer Claims Process Order, Pure Gold and the Monitor may apply to this Court from time to time for directions from this Court with respect to this Post-Filing Director/Officer Claims Process Order and the Post-Filing Director/Officer Claims Process or for such further order or orders as either of them may consider necessary or desirable to amend, supplement or replace this Post-Filing Director/Officer Claims Process Order, including the schedules to this Post-Filing Director/Officer Claims Process Order.
33. **THIS COURT REQUESTS** the aid and recognition of other Canadian and foreign courts, tribunal, regulatory or administrative bodies to act in aid of and to be complementary to this Court in carrying out the terms of this Post-Filing Director/Officer Claims Process Order where required. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to Pure Gold and to the Monitor, as an officer of this Court, as may be necessary or desirable to give effect to this Post-Filing Director/Officer Claims Process Order.

34. Endorsement of this order by counsel appearing on this application, other than counsel for Pure Gold, 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 Peter L. Rubin
Lawyer for Pure Gold

BY THE COURT

REGISTRAR

SCHEDULE "A" TO POST-FILING DIRECTOR/OFFICER CLAIMS PROCESS ORDER

Counsel Appearing

COUNSEL NAME	PARTY REPRESENTED
Kibben Jackson	KSV Restructuring Inc., in its capacity as the Monitor
Colin Brousson	Sprott Private Resource Lending II (Collector), LP, Sprott Private Resource Lending II (CO), Inc., and Sprott Resource Lending Corp.

SCHEDULE "B" TO POST-FILING DIRECTOR/OFFICER CLAIMS PROCESS ORDER

Definitions

1. "ARIO" means the order granted in the CCAA Proceedings on November 9, 2022 amending and restating the Initial Order, as such order may be amended and extended from time to time;
2. "BC BCA" means the British Columbia *Business Corporations Act*, S.B.C. 2002, C. 57, as amended.
3. "Business Day" means any day other than a Saturday, Sunday or a day on which banks in Vancouver, British Columbia are authorized or obligated by applicable law to close or otherwise are generally closed;
4. "CAA" means the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended;
5. "CAA Charges" means, collectively, the Administration Charge, the D&O Charge, the Interim Lender's Charge (each as defined in the ARIO), the KERP Charge (as defined in the Order (Key Employee Retention Plan Approval) of this Court dated November 9, 2022), the Sales Agent Charge (as defined in the Order (SISP and Sales Agent Approval of this Court dated November 9, 2022), and the SERP Charge (as defined in the Order (Site Employee Retention Plan Approval) of this Court made March 30, 2023) and any other charge over Pure Gold's assets created by any other order of this Court in the CCAA Proceedings;
6. "CAA Proceedings" means the proceedings commenced by Pure Gold under the CCAA on the Filing Date in Supreme Court of British Columbia Action No. S-228723, Vancouver Registry;
7. "Claim" means any claim or liability arising in whole or in part after the Filing Date, claimed by any Person against Pure Gold's Officers and Directors, for which any of the Directors or Officers are by statute or otherwise by law liable to pay in their capacity as Directors or Officers or in any other capacity and shall, for greater certainty, include any Claim arising through subrogation against any Director or Officer;
8. "Claims Bar Date" means 4:00 p.m. (Vancouver time) on June 12, 2023 or such other date as may be ordered by this Court;
9. "Claims Process Forms" means the Claims Process Instruction Letter, Post-Filing Director/Officer Claim Form, Notice of Revision or Disallowance, and Notice of Dispute of Revision or Disallowance;
10. "Court" means the Supreme Court of British Columbia presiding over these CCAA Proceedings;
11. "Director" means any Person who is or was, or may be deemed to be or have been, whether by statute, operation of law or otherwise, a director of an Applicant;
12. "Employee" means any Person who is or was or may be deemed to be or have been, whether by statute, operation of law or otherwise, a current or former employee of Pure

Gold whether on a full-time, part-time, or temporary basis, including any individuals on disability leave, parental leave, or other absence;

13. **"Filing Date"** means October 31, 2022;
14. **"includes"** means includes, without limitation, and **"including"** means including, without limitation;
15. **"Initial Order"** means the order of this Court granted on October 31, 2022 in the CCAA Proceedings;
16. **"Lien"** means any mortgage, charge, pledge, assignment by way of security, lien, hypothec, security interest, deemed trust or other encumbrance granted or arising pursuant to a written agreement or statute or otherwise created by law;
17. **"Monitor"** means KSV Restructuring Inc. in its capacity as Court-appointed Monitor of Pure Gold, and not in its personal capacity;
18. **"Monitor's Website"** means the Monitor's website located at <https://www.ksvadvisory.com/experience/case/pure-gold->;
19. **"Notice of Dispute of Revision or Disallowance"** means the notice substantially in the form attached as Schedule "F" to the Claims Process Order that may be delivered by a Post-Filing Director/Officer Claimant who has received a Notice of Revision or Disallowance to dispute such Notice of Revision or Disallowance;
20. **"Notice of Revision or Disallowance"** means the notice substantially in the form attached as Schedule "E" to the Post-Filing Director/Officer Claims Process Order that may be delivered by the Monitor to a Post-Filing Director/Officer Claimant advising that the Post-Filing Director/Officer Claimant's Claim has revised or disallowed in whole or in part as set out in its Post-Filing Director/Officer Claim Form;
21. **"Officer"** means any Person who is or was, or may be deemed to be or have been, whether by statute, operation of law or otherwise, an officer of Pure Gold;
22. **"Person"** means any individual, firm, partnership, joint venture, venture capital fund, association, trust, trustee, executor, administrator, legal personal representative, estate, group, body corporate (including a limited liability company and an unlimited liability company), corporation, unincorporated association or organization, government, governmental or regulatory authority, syndicate, or other entity, whether or not having legal status;
23. **"Plan"** means any plan of arrangement or compromise or distribution under the CCAA or any plan of arrangement under the BC BCA or other corporate statute;
24. **"Post-Filing Director/Officer Claimant"** means any Person including an Employee having a Claim and includes, without limitation, the transferee or assignee of a transferred Claim determined in accordance with paragraph 13 of this Post-Filing Director/Officer Claims Process Order, or a trustee, liquidator, receiver, manager, or other Person acting on behalf of such Person;

25. **"Post-Filing Director/Officer Claim Form"** means the form on which a Post-Filing Director/Officer Claimant may set out its Claim, substantially in form attached as Schedule "D" to the Post-Filing Director/Officer Claims Process Order;
26. **"Post-Filing Director/Officer Claims Process"** means the determination and adjudication of Claims to be undertaken and administered by the Monitor and Pure Gold pursuant to the terms of this Post-Filing Director/Officer Claims Process Order;
27. **"Post-Filing Director/Officer Claims Process Instruction Letter"** means the letter substantially in the form attached as Schedule "C" to the Post-Filing Director/Officer Claims Process Order explaining the Post-Filing Director/Officer Claims Process, including how to prove a Claim;
28. **"Post-Filing Director/Officer Claims Process Order"** means the order of this Court made in the CCAA Proceedings on May 10, 2023 establishing the Post-Filing Director/Officer Claims Process to which this Schedule "B" is appended;
29. **"Post-Filing Director/Officer Proven Creditor"** means any Post-Filing Director/Officer Claimant that has a Proven Claim;
30. **"Press Release"** means the notice to the public advising of the granting of this Post-Filing Director/Officer Claims Process Order and the initiation of the Post-Filing Director/Officer Claims Process, including the Claims Bar Date, to be published in accordance with paragraph 5 of this Post-Filing Director/Officer Claims Process Order;
31. **"Proven Claim"** means the amount, status and validity of the Claim of a Post-Filing Director/Officer Claimant finally determined in accordance with the Post-Filing Director/Officer Claims Process which shall be final for all purposes, including for voting and distribution purposes, whether under any Plan or otherwise. A Claim becomes a Proven Claim only in accordance with the process set forth in this Post-Filing Director/Officer Claims Process Order; and
32. **"Service List"** means the service list kept by the Monitor and Pure Gold in the CCAA Proceeding and posted on the Monitor's Website.

SCHEDULE "C" TO POST-FILING DIRECTOR/OFFICER CLAIMS PROCESS ORDER

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF
PURE GOLD MINING INC.

POST-FILING DIRECTOR/OFFICER CLAIMS PROCESS INSTRUCTION LETTER

This Instruction Letter must be read together with the Post-Filing Director/Officer Claims Process Order of the Supreme Court of British Columbia granted on May 10, 2023 (the "**Post-Filing Director/Officer Claims Process Order**"). The Post-Filing Director/Officer Claims Process Order establishes a Post-Filing Director/Officer Claims Process by which Claims against Pure Gold's Directors and Officers arising after the Filing Date may be proved.

For greater certainty, only Claims against Pure Gold's Directors and Officers arising after the Filing Date (October 31, 2022) are subject to this Order and must be submitted to the Monitor.

A copy of the Post-Filing Director/Officer Claims Process Order is available at <https://ksvadvisory.com/experience/case/puregold>. All capitalized terms not otherwise defined in this document have the same meanings as are found in Schedule "B" of the Post-Filing Director/Officer Claims Process Order.

Please note that certain steps you may wish to take with respect to your Claim must be done prior to the Claims Bar Date, which is 4:00 p.m. (Vancouver time) on June 12, 2023. Failure to take certain actions prior to the Claims Bar Date may impact any Claim you may have and can result in a Claim becoming forever barred or extinguished.

If you wish to assert a Claim against a Director or Officer of Pure Gold you must complete and return to the Monitor a completed Post-Filing Director/Officer Claim Form setting forth the amount and status of your alleged Claim. The Post-Filing Director/Officer Claim Form must attach all appropriate documentation evidencing the Claim.

The completed Post-Filing Director/Officer Claim Form must be received by the Monitor by 4:00 p.m. (Vancouver time) on the Claims Bar Date.

The Claims Bar Date is 4:00 p.m. (Vancouver time) on June 12, 2023 or such other date as may be ordered by the court.

Where a Post-Filing Director/Officer Claim Form is received by the Monitor, the Monitor, in consultation with Pure Gold and, to the extent the Monitor determines appropriate, the relevant Director(s) or Officer(s) will review the Post-Filing Director/Officer Claim Form and, as soon as reasonably practicable, determine whether the Claim set out in the Post-Filing Director/Officer Claim Form is accepted, disputed in whole, or disputed in part.

Where the Claim is disputed in whole or in part, the Monitor will, within 30 Business Days after the Claims Bar Date issue a Notice of Revision or Disallowance to you advising that the Claim as set out in your Post-Filing Director/Officer Claim Form has been revised or disallowed and the reasons therefor.

If you object to a Notice of Revision or Disallowance, you must submit to the Monitor a Notice of Dispute of Revision or Disallowance by prepaid registered mail, email, personal delivery, courier, or facsimile to the Monitor within ten Business Days of the date of delivery of the Notice of Revision or Disallowance.

You must also, within 15 Business Days after the date of delivery of the Notice of Revision or Disallowance, file and serve on Pure Gold, the Monitor, and the Director or Officer subject to the Claim a Notice of Application seeking to appeal the Notice or Revision or Disallowance, along with all supporting affidavit material. The appeal from the Notice of Revision or Disallowance shall proceed as a hearing *de novo*, and the parties may adduce evidence in respect of the Claim not previously included in connection with the applicable Post-Filing Director/Officer Claim Form or in connection with the corresponding Notice of Revision or Disallowance.

All documentation referred to in this Instruction. Letter that must be delivered to the Monitor, including a Post-Filing Director/Officer Claim Form or a Notice of Dispute of Revision or Disallowance, and all enquiries or questions regarding the Post-Filing Director/Officer Claims Process, should be addressed to the court-appointed Monitor at:

KSV Restructuring Inc.
In its capacity as Monitor of
Pure Gold Inc.

220 Bay Street, 13th Floor, PO Box 20,
Toronto, Ontario, M5J 2W4
Attn: Christian Vit
Telephone: 416.932.6262
Fax: 416.932.6266
Email: cvit@ksvadvisory.com

Additional information and forms related to the Post-Filing Director/Officer Claims Process can be found on the Monitor's Website or obtained by contacting the Monitor at the address indicated above and providing your contact information including name, address, and e-mail address.

All forms submitted in connection with the Post-Filing Director/Officer Claims Process, including Post-Filing Director/Officer Claim Form and a Notice of Dispute of Revision or Disallowance, must be submitted in a currency other than Canadian Dollars will be converted to Canadian Dollars at the applicable Bank of Canada exchange rate published on the Filing Date.

If you are submitting a Post-Filing Director/Officer Claim Form or Notice of Dispute of Revision or Disallowance Form electronically, please submit such form, and any accompanying documentation, at the applicable time in one PDF file.

IN ACCORDANCE WITH THE TERMS OF THE POST-FILING DIRECTOR/OFFICER CLAIMS PROCESS ORDER, IF YOU FAIL TO FILE A POST-FILING DIRECTOR/OFFICER CLAIM FORM BY THE CLAIMS BAR DATE YOUR CLAIMS (BEING ANY CLAIMS AGAINST PURE GOLD'S DIRECTORS AND OFFICERS ARISING AFTER THE FILING DATE) WILL BE FOREVER BARRED AND EXTINGUISHED, AND YOU WILL BE PROHIBITED FROM MAKING OR ENFORCING A CLAIM AGAINST PURE GOLD'S DIRECTORS AND OFFICERS. ANY FURTHER CLAIMS AGAINST PURE GOLD'S DIRECTORS OR OFFICERS WILL BE FOREVER BARRED AND EXTINGUISHED, AND YOU WILL BE PROHIBITED FROM MAKING OR ENFORCING ANY SUCH FURTHER CLAIMS AGAINST PURE GOLD'S DIRECTORS AND OFFICERS.

DATED THE _____ DAY OF _____, 2023 AT THE CITY OF TORONTO, IN THE PROVINCE OF ONTARIO

KSV Restructuring Inc.
In its capacity as Monitor of
Pure Gold Mining Inc.

PER: _____
Bobby Kofman, Managing Director

SCHEDULE "D" TO POST-FILING DIRECTOR/OFFICER CLAIMS PROCESS ORDER

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF
PURE GOLD MINING INC.

POST-FILING DIRECTOR/OFFICER CLAIM FORM

This Post-Filing Director/Officer Claim Form must be read together with the Post-Filing Director/Officer Claims Process order (the "**Post-Filing Director/Officer Claims Process Order**") of the Supreme Court of British Columbia granted on May 10, 2023 and the Post-Filing Director/Officer Claims Process Instruction Letter. Copies of the Post-Filing Director/Officer Claims Process Order and the Post-Filing Director/Officer Claims Process Instruction Letter are available at <https://www.ksvadvisory.com/experience/case/pure-gold->. All capitalized terms not otherwise defined herein have the same meanings as are given to them in Schedule B" of the Post-Filing Director/Officer Claims Process Order.

1. Name(s) and Position(s) and company of Officer(s) and/or Director(s) the Claim is being made against:

2A. Original Claimant (the "Claimant")

Legal Name of Claimant:	_____	Name of Contact	_____
Address	_____	Title	_____
	_____	Phone #	_____
	_____	Fax #	_____
City	_____	Prov /State	_____
		Email	_____
Postal/Zip Code	_____		

2B. Has all or part of the Claim been transferred by the Post-Filing Director/Officer Claimant to another party?

Yes:

No:

2C. Particulars of Transferee(s) (If any)

Please complete the following if all or a portion of the Claim has been transferred. Insert full legal name of the transferee(s) of the Claim. If there is more than one transferee, please attach a separate sheet with the required information and any documents evidencing assignment.

Full Legal Name of Transferee:	
Full Mailing Address of Transferee:	
Telephone Number of Transferee:	
Facsimile Number of Transferee:	
E-mail address of Transferee:	
Attention (Contact Person):	

3. Amount and Type of Claim

The Director(s) and/or Officer(s) listed below was/were and still is/are indebted to the Claimant as follows:

NAME(S) OF DIRECTOR(S) AND/OR OFFICER(S)	CLAIM AMOUNT

4. Documentation

Provide all particulars of the Claim and all available supporting documentation, including amount and description of transaction(s) or agreement(s), and the legal basis for the Claim against the specific Directors or Officers at issue.

Please note, this Post-Filing Director/Officer Claims Process calls for claims against Pure Gold's Directors and Officers arising after the Filing Date (October 31, 2022) only.

5. Certification	
I hereby certify that:	
<ol style="list-style-type: none">1. I am the Claimant or an authorized representative of the Claimant.2. I have knowledge of all the circumstances connected with this Claim.3. The Claimant asserts this Claim as set out above.4. All available documentation in support of this Claim is attached.	
All information submitted in this Post-Filing Director/Officer Claim Form must be true, accurate and complete. Filing a false Post-Filing Director/Officer Claim Form may result in your Claim being disallowed in whole or in part and may result in further penalties.	
Signature: _____ Name: _____ Title: _____	Witness ¹ : _____ (signature) _____ (print)
Dated at _____ this _____ day of _____, 2023.	

Your completed Post-Filing Director/Officer Claims Form must be delivered to Pure Gold's Court-Appointed Monitor by the Claims Bar Date at:

KSV Restructuring Inc.
In its capacity as Monitor of
Pure Gold Inc.

220 Bay Street, 13th Floor, PO Box 20,
Toronto, Ontario, M5J 2W4
Attn: Christian Vit
Telephone: 416.932.6262
Fax: 416.932.6266
Email: cvit@ksvadvisory.com

¹ Witnesses are required if an individual is submitting this Director/Officer Claim form by prepaid ordinary mail, registered mail, courier, personal delivery, facsimile transmission, or email.

The Claims Bar Date is 4:00 p.m. (Vancouver time) on June 12, 2023 or such other date as may be ordered by the Court.

IN ACCORDANCE WITH THE TERMS OF THE POST-FILING DIRECTOR/OFFICER CLAIMS PROCESS ORDER, IF YOU FAIL TO COMPLETE AND SUBMIT A POST-FILING DIRECTOR/OFFICER CLAIMS FORM IN ACCORDANCE WITH THE POST-FILING DIRECTOR/OFFICER CLAIMS PROCESS ORDER BY THE CLAIMS BAR DATE ANY CLAIM (BEING ANY CLAIM AGAINST PURE GOLD'S DIRECTORS AND OFFICERS ARISING AFTER THE FILING DATE) THAT YOU MAY HAVE AGAINST ANY OF PURE GOLD'S DIRECTORS OR OFFICERS WILL BE FOREVER BARRED AND EXTINGUISHED, AND YOU WILL BE PROHIBITED FROM MAKING OR ENFORCING ANY FURTHER CLAIMS AGAINST ANY OF PURE GOLD'S DIRECTORS AND OFFICERS .

SCHEDULE "E" TO POST-FILING DIRECTOR/OFFICER CLAIMS PROCESS ORDER
IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF
PURE GOLD MINING INC.

NOTICE OF REVISION OR DISALLOWANCE

This Notice of Revision or Disallowance must be read together with the Post-Filing Director/Officer Claims Process Order (the "**Post-Filing Director/Officer Claims Process Order**") of the Supreme Court of British Columbia granted on May 10, 2023. A copy of the Post-Filing Director/Officer Claims Process Order is available at <https://www.ksvadvisory.com/experience/case/pure-gold->. All capitalized terms not otherwise defined herein have the same meanings as are given to them in Schedule "B" to the Post-Filing Director/Officer Claims Process Order.

Full Legal Name of Post-Filing Director/Officer Claimant:

Claim Reference Number: _____

Pursuant to the Post-Filing Director/Officer Claims Process Order, the Monitor hereby gives you notice that your Post-Filing Director/Officer Claim Form has been reviewed by the Monitor, in consultation with Pure Gold and/or its Directors and Officers, as applicable, and that your Claim has been revised or disallowed your Claim as follows:

	As Submitted (\$CAD)	Revised Claim as Accepted (\$CAD)	Secured (\$CAD)	Unsecured (\$CAD)
Post-Filing Director/Officer Claim Form	[]	[]	[]	[]

Reason for the Revision or Disallowance:

If you do not agree with this Notice of Revision or Disallowance, please take notice of the following:

To dispute a Notice of Revision or Disallowance you MUST:

- (a) Deliver a Notice of Dispute of Revision or Disallowance, a blank copy of which is enclosed in your Claims Package, by prepaid registered mail, personal delivery, e-mail (in pdf format), courier or facsimile transmission to the address indicated herein so that such Notice of Dispute of Revision or Disallowance is received by the Monitor within ten Business Days (before 4:00 p.m.) after the date of delivery of this Notice of Revision or Disallowance, or such other date as may be agreed to by the Monitor, in consultation with Pure Gold; and
- (b) File with the Court and serve on Pure Gold, the Monitor, and the applicable Director or Officer, a Notice of Application seeking to appeal the Notice of Revision or Disallowance, along with all supporting affidavit material, within 15 Business Days after the delivery of this Notice of Revision or Disallowance, or such other date as may be agreed to by the Monitor in consultation with Pure Gold, or the Court may order.

Address for service of Notice of Dispute of Revision or Disallowance:

KSV Restructuring Inc.
In its capacity as Monitor of
Pure Gold Inc.

220 Bay Street, 13th Floor, PO Box 20,
Toronto, Ontario, M5J 2W4
Attn: Christian Vit
Telephone: 416.932.6262
Fax: 416.932.6266
Email: cvit@ksvadvisory.com

IF YOU DO NOT DELIVER A NOTICE OF DISPUTE OF REVISION OR DISALLOWANCE 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.

Dated the _____ day of _____, 2023
At the City of Toronto, Ontario

Per:

KSV Restructuring Inc.
In its capacity as Monitor of
Pure Gold Inc.

Bobby Kofman
Managing Director

SCHEDULE "F" TO POST-FILING DIRECTOR/OFFICER CLAIMS PROCESS ORDER
IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF
PURE GOLD MINING INC.

NOTICE OF DISPUTE OF REVISION OR DISALLOWANCE

This Notice of Revision or Disallowance must be read together with the Post-Filing Director/Officer Claims Process Order (the "**Post-Filing Director/Officer Claims Process Order**") of the Supreme Court of British Columbia granted on May 10, 2023. A copy of the Post-Filing Director/Officer Claims Process Order is available at <https://www.ksvadvisory.com/experience/case/pure-gold->. All capitalized terms not otherwise defined herein have the same meanings as are given to them in Schedule "B" to the Post-Filing Director/Officer Claims Process Order.

Pursuant to the Post-Filing Director/Officer Claims Process Order, notice is hereby given to you that the undersigned Post-Filing Director/Officer 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 Original Post-Filing Director/Officer Claimant: _____

	Claim as Accepted in the Notice of Revision and Disallowance (\$CAD)	Amount Claimed (\$CAD)	Secured (\$CAD)	Unsecured (\$CAD)
Post-Filing Director/Officer Claim Form				

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

Signature of Post-Filing Director/Officer Claimant or Representative of Corporate Post-Filing Director/Officer Claimant: _____

Date: _____

[Please print name]: _____

Telephone Number: (____) _____

Facsimile Number: (____) _____

Email Address: _____

Full Mailing Address:

Your complete Notice of Dispute of Revision or Disallowance must be delivered to Pure Gold's court-appointed Monitor in PDF format within ten Business 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 Monitor of
Pure Gold Inc.

220 Bay Street, 13th Floor, PO Box 20,
Toronto, Ontario, M5J 2W4
Attn: Christian Vit
Telephone: 416.932.6262
Fax: 416.932.6266
Email: cvit@ksvadvisory.com

In addition to delivering this Notice of Dispute of Revision or Disallowance to the Monitor you **MUST, within 15 Business Days after the date of delivery of the Notice of Revision or Disallowance** (or such other date as may be agreed to by the Monitor or ordered by the Court) file and serve on Pure Gold, the Monitor, and 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>IF YOU DO NOT DELIVER A NOTICE OF DISPUTE OF REVISION OR DISALLOWANCE 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.</p>
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SCHEDULE "G" TO POST-FILING DIRECTOR/OFFICER CLAIMS PROCESS ORDER

Press Release

NEWS RELEASE 23-06

May 10, 2023

PureGold Announces Court Approval of Post-Filing Director/Officer Claims Process

NOT FOR DISTRIBUTION TO UNITED STATES NEWSWIRE SERVICES OR FOR DISSEMINATION IN THE UNITED STATES

VANCOUVER, B.C. – Pure Gold Mining Inc. (NEX:PGM.H) (the "**Company**") announces that today, on application by the Company, the British Columbia Supreme Court (the "**Court**") has approved a Post-Filing Director/Officer Claims Process Order (the "**Order**") as part of the Company's ongoing proceedings pursuant to the *Companies Creditors Arrangement Act* (the "**CCAA Proceedings**"). The Order provides for a "Post-Filing Director/Officer Claims Process" pursuant to which the Court-appointed Monitor, KSV Restructuring Inc. (the "**Monitor**") and the Company will call for and adjudicate, as necessary, all claims against the Company's directors and officers arising after October 31, 2022 ("**Post-Filing Director/Officer Claims**").

Anyone who wishes to assert a Post-Filing Director/Officer Claim against the Company's directors or officers must submit a "Post-Filing Director/Officer Claim Form" to the Monitor. Copies of all forms will be available on the Monitor's website at <https://ksvadvisory.com/experience/case/puregold> (the "**Monitor's Website**").

All Post-Filing Director/Officer Claim Forms must be received by the Monitor by no later than 4:00 p.m. (PST) on the "Claims Bar Date" of **June 12, 2023**. Any Post-Filing Director/Officer Claims that are not received by the Claims Bar Date will be forever barred and extinguished.

All claims submitted to the Monitor will be subject to the Post-Filing Director/Officer Claims Process as set out in the Order.

All inquires regarding the Post-Filing Director/Officer Claims Process and the CCAA Proceedings should be directed to the Monitor (Christian Vit) at email: cvit@ksvadvisory.com or telephone: 416.932.6262.

Information about the Company's CCAA Proceedings, including all court orders, are available on the Monitor's Website.

About Pure Gold Mining Inc.

The Company is a Canadian gold mining company with a mine (the "**Mine**") located in Red Lake, Ontario, Canada. The Company owns and operates the Company's Mine, which began gold production in 2021 after the successful construction of an 800 tpd underground mine and processing facility. The Company's Mine is centered on a forty-seven square kilometre property with significant discovery potential.

Additional information about the Company and its activities may be found on the Company's website at www.puregoldmining.ca and under the Company's profile at www.sedar.com

ON BEHALF OF THE COMPANY

"Jonathan Singh"

Jonathan Singh, Chief Administrative Officer

Neither TSX Venture Exchange nor its Regulation Services Provider (as that term is defined in policies of the TSX Venture Exchange) accepts responsibility for the adequacy or accuracy of this release.

All statements in this press release, other than statements of historical fact, are "forward-looking information" with respect to the Company within the meaning of applicable securities laws, including, but not limited to statements relating to any claims made against the Company's officers and directors. Forward-looking information is often, but not always, identified by the use of words such as "seek", "anticipate", "plan", "continue", "planned", "expect", "project", "predict", "potential", "targeting", "intends", "believe", "potential", and similar expressions, or describes a "goal", or variation of such words and phrases or state that certain actions, events or results "may", "should", "could", "would", "might" or "will" be taken, occur or be achieved. Forward-looking information is not a guarantee of future performance and is based upon a number of estimates and assumptions of management at the date the statements are made including, among others, assumptions about future prices of gold and other metal prices, currency exchange rates and interest rates, favourable operating conditions, political stability, obtaining governmental approvals and financing on time, obtaining renewals for existing licences and permits and obtaining required licences and permits, labour stability, stability in market conditions, availability of equipment, accuracy of any mineral resources, successful resolution of disputes and anticipated costs and expenditures. Many assumptions are based on factors and events that are not within the control of the Company and there is no assurance they will prove to be correct.

Such forward-looking information, involves known and unknown risks, which may cause the actual results to be materially different from any future results expressed or implied by such forward-looking information, including, risks related to the CCAA proceedings and the impact of the same on the Company's operations; the Post-Filing Director/Officer Claims Process, current economic conditions; future prices of commodities; possible variations in grade or recovery rates; the costs and timing of the development of new deposits; failure of equipment or processes to operate as anticipated; the failure of contracted parties to perform; the timing and success of exploration and development activities generally; delays in permitting; possible claims against the Company; the timing of future economic studies; labour disputes and other risks of the mining industry; delays in obtaining governmental approvals, financing or in the completion of exploration as well as those factors discussed in the Annual Information Form of the Company dated March 30, 2022 in the section entitled "Risk Factors", under the Company's SEDAR profile at www.sedar.com.

Although the Company has attempted to identify important factors that could cause actual actions, events or results to differ materially from those described in forward-looking information, there may be other factors that cause actions, events or results not to be as anticipated, estimated or intended. There can be no assurance that such information will prove to be accurate as actual results and future events could differ materially from those anticipated in such statements. The Company disclaims any intention or obligation to update or revise any forward-looking information, whether as a result of new information, future events or otherwise unless required by law.

**IN THE SUPREME COURT OF BRITISH
COLUMBIA**

IN THE MATTER OF THE *COMPANIES'*
CREDITORS ARRANGEMENT ACT,
R.S.C. 1985, C. C-36, AS AMENDED

AND

IN THE MATTER OF THE BUSINESS
CORPORATIONS ACT,
S.B.C. 2002, C. 57, AS AMENDED AND THE
BUSINESS
CORPORATIONS ACT, S.N.B. 1981, C. B-9 1, AS
AMENDED

AND

IN THE MATTER OF A PLAN OF COMPROMISE
AND ARRANGEMENT OF PURE GOLD MINING
INC.

PETITIONER

**ORDER MADE AFTER APPLICATION
(POST-FILING DIRECTOR/OFFICER CLAIMS
PROCESS ORDER)**

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