

SCHEDULE "A"

NOTICE TO UNREPRESENTED PRE-SALE PURCHASERS

On November 14, 2023, pursuant to an order (as amended, restated and supplemented from time to time, the "**Amended Receivership Order**") of the Ontario Superior Court of Justice (Commercial List) (the "**Court**"), KSV Restructuring Inc. ("**KSV**") was appointed the receiver and manager (in such capacity, the "**Receiver**") of certain assets, property and undertakings of, among others, Vandyk – Lakeview-DXE-West Limited and Vandyk – Lakeview-DXE-East Limited (together, "**Lakeview**"). On April 27, 2026, the Court granted an order (the "**Approval and Vesting Order**") which, among things, approved a Stalking Horse Agreement of Purchase and Sale dated December 29, 2025 between KingSett Mortgage Corporation and the Receiver (as amended on January 14, 2026 and April 8, 2026, the "**Stalking Horse APS**"). Following the Approval and Vesting Order, certain purchasers of units in the condominium project being developed at 1345 Lakeshore Road East, Mississauga, Ontario (the "**Lakeview Project**") delivered letters (collectively, the "**Rescission Letters**") purporting to rescind their respective agreement of purchase and sale for the purchase of one or more condominium unit(s) in the Lakeview Project (the "**Pre-Sale Contracts**" and each a "**Pre-Sale Contract**"). On May 13, 2026, the transaction contemplated by the Stalking Horse APS closed in accordance with its terms which resulted in, among other things, the Pre-Sale Contracts being acquired by KS Lakeview Dixie Holdings Inc. ("**KS Lakeview**") as nominee and bare trustee for KS Lakeview Dixie LP. On May 13, 2026, the Receiver and KS Lakeview, in accordance with section 74(8) of the *Condominium Act*, 1998, S.O. 1998, c. 19 (the "**Condominium Act**"), filed an application (the "**Application**"), among other things, seeking a declaration that the issues raised in the Rescission Letters do not constitute a "material change" or "material changes" under section 74(2) of the *Condominium Act* or the Pre-Sale Contracts.

FURTHER TAKE NOTICE THAT pursuant to an order (the "**Representative Counsel Appointment Order**") of the Court dated June 9, 2026:

1. Addario Law Group LLP (in such capacity, "**Representative Counsel**") was appointed as representative counsel for the purpose of representing the interests of the unrepresented purchasers who sent one or more Rescission Letters in connection with their Pre-Sale Contract(s) (the "**Unrepresented Pre-Sale Purchasers**"). A copy of the Order can be accessed on the website of the Receiver: <https://www.ksvadvisory.com/experience/case/vandyk/>.
2. You are receiving this notice because the records of the Receiver and KS Lakeview indicate that you are an Unrepresented Pre-Sale Purchaser.
3. Representative Counsel will represent the interests of the Unrepresented Pre-Sale Purchasers, as a group and not individually, within the scope of the Mandate (as defined and outlined below).
4. A committee consisting initially of Tiana Savic and such other individuals as may be selected subsequent to June 9, 2026 in accordance with the Order (collectively, the "**Unrepresented Pre-Sale Purchaser Representatives**") has been appointed by the Order. The

Unrepresented Pre-Sale Purchaser Representatives are the sole parties that have the authority to provide instructions to Representative Counsel.

5. The mandate of the Unrepresented Pre-Sale Purchaser Representatives and Representative Counsel is specifically limited to advancing the interests of the Unrepresented Pre-Sale Purchasers, as a group and not individually, in the Proceedings in connection with the Application which includes representing Unrepresented Pre-Sale Purchasers, taking positions on their behalf in the Application, coordinating the submission of evidence and legal argument, participation in scheduling matters, attending, conducting and defending cross-examinations, attending hearings and, if necessary, seeking directions from the Court (collectively, the "**Mandate**"). The reasonable professional fees and disbursements incurred by Representative Counsel on behalf of the Unrepresented Pre-Sale Purchasers in carrying out the Mandate shall be paid by KS Lakeview in accordance with the Representative Counsel Appointment Order, provided that such fees (inclusive of disbursements) shall not exceed \$75,000 plus applicable taxes.

6. In carrying out the Mandate, the Unrepresented Pre-Sale Purchaser Representatives and Representative Counsel will represent the interests of the Unrepresented Pre-Sale Purchasers as a group. The Unrepresented Pre-Sale Purchaser Representatives and Representative Counsel will not provide representation or advice concerning the specific personal circumstances of any individual Unrepresented Pre-Sale Purchaser.

7. To the extent that you require legal or other advice about your individual situation or about matters outside the scope of the Mandate, you may retain your own legal counsel and pursue whatever remedies you deem appropriate.

8. Representative Counsel may not be able to individually respond to questions posed by the Unrepresented Pre-Sale Purchasers. However, the Unrepresented Pre-Sale Purchasers may email questions to Andrew Max (amax@addario.ca) and Nikolas De Stefano (ndestefano@addario.ca) and, to the extent that any questions may be of relevance to the Unrepresented Pre-Sale Purchasers generally, Representative Counsel may address such questions in a subsequent communication.

9. Any updates that Representative Counsel sends to the Unrepresented Pre-Sale Purchasers will also be posted on the website of the Receiver at <https://www.ksvadvisory.com/experience/case/vandyk/>.

IF YOU DO NOT WISH TO BE REPRESENTED by the Unrepresented Pre-Sale Purchaser Representatives and Representative Counsel, you must, before June 19, 2026, provide an Opt-Out Notice (a copy of which can be obtained from the Receiver's website) indicating that you wish to opt-out of such representation and send the completed Opt-Out Notice to:

To: Addario Law Group

Attention: Andrew Max

Email: amax@addario.ca

Fax: 866-714-1196

Persons requiring further information about the Proceedings should review the website established by the Receiver (<https://www.ksvadvisory.com/experience/case/vandyk/>).

SCHEDULE "B"
FORM OF OPT-OUT NOTICE

To: Addario Law Group LLP

Attention: Andrew Max

I am an Unrepresented Pre-Sale Purchaser as defined in the Representative Counsel Appointment Order of the Ontario Superior Court of Justice (Commercial List) dated June 9, 2026 (the "**Order**"). Terms used in this notice but not otherwise defined herein have the meaning given to them in the Order.

I hereby provide written notice that I do not wish to be represented by Addario Law Group LLP as representative counsel (in such capacity, the "**Representative Counsel**") for the Unrepresented Pre-Sale Purchasers or by the Unrepresented Pre-Sale Purchaser Representatives in accordance with paragraph 12 of the Order. I understand that by opting out of representation, if I wish to take part in the Proceedings and/or Application that I would then be responsible for retaining my own legal counsel should I choose to do so.

I understand that a copy of this notice will be provided to KS Lakeview and to the Receiver.

Witness

Signature

Name [please print]: _____

Address:

Telephone: _____

Note: To opt out, this form must be completed and received at the above address on or before _____, 2026.