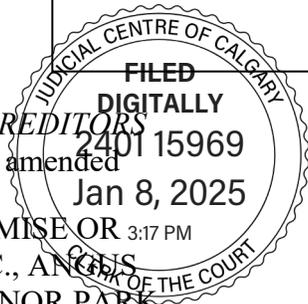


COURT FILE NUMBER 2401-15969
COURT COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY

Clerk's Stamp



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

AND IN THE MATTER OF THE COMPROMISE OR ARRANGEMENT OF ANGUS A2A GP INC., ANGUS MANOR PARK A2A GP INC., ANGUS MANOR PARK A2A CAPITAL CORP., ANGUS MANOR PARK A2A DEVELOPMENTS INC., HILLS OF WINDRIDGE A2A GP INC., WINDRIDGE A2A DEVELOPMENTS, LLC, FOSSIL CREEK A2A GP INC., FOSSIL CREEK A2A DEVELOPMENTS, LLC, A2A DEVELOPMENTS INC., SERENE COUNTRY HOMES (CANADA) INC. and A2A CAPITAL SERVICES CANADA INC.

DOCUMENT **APPLICATION FOR A RESTRICTED COURT ACCESS ORDER**

APPLICANT **CANADIAN REP COUNSEL on behalf of CANADIAN INVESTORS (BOTH AS DEFINED IN THE AMENDED AND RESTATED INITIAL ORDER)**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT **Fasken Martineau DuMoulin LLP**
Barristers and Solicitors
3400 First Canadian centre
350 – 7th Avenue SW
Calgary, AB, T2P 3N9

Attention: Robyn Gurofsky / Kaitlyn Wong
Telephone: (403)261-9469 / (403)261-7388
Email: rgurofsky@fasken.com / kwong@fasken.com

File No.: 340252.00001

NOTICE TO THE RESPONDENTS AND SERVICE LIST AT SCHEDULE "A" ATTACHED HERETO

This application is made against you. You are a respondent.
You have the right to state your side of this matter before the judge.
To do so, you must be in Court when the application is heard as shown below:

Date	January 16 and 17, 2025
Time	10:00 a.m. MST
Where	Calgary Courts Centre or via WebEx
Before Whom	The Honourable Justice C. Feasby

Go to the end of this document to see what you can do and when you must do it.

Remedy claimed or sought:

1. Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Amended and Restated Initial Order, granted November 25, 2024 (the “**ARIO**”).
2. Canadian Rep Counsel on behalf of Canadian Investors seeks a restricted court access order in respect of Confidential Exhibit “A” to Secretarial Affidavit No. 3 of Kim Picard, sworn January 8, 2025 (the “**Third Picard Affidavit**”) substantially in the form attached hereto as **Schedule “B”** (the “**Sealing Order**”), and such further and other relief as may be sought by the Applicants and this Honourable Court may deem appropriate.

Grounds for making this application:

3. Canadian Rep Counsel seeks a Sealing Order over Confidential Exhibit “A” to the Third Picard Affidavit on the basis that it contains an unredacted copy of Canadian Rep Counsel’s internal tracking sheet which lists the names of the Canadian Investors who provided information to Canadian Rep Counsel.
4. Confidential Exhibit “A” contains personal information about Canadian Investors and Canadian Rep Counsel does not have the permission of the Investors to share such information publicly.
5. Sealing Confidential Exhibit “A” is the least restrictive method available to prevent the dissemination of sensitive personal information. The salutary effects of the Sealing Order, which are to protect the general commercial interest of maintaining confidentiality, far outweigh the deleterious effects of restricting the accessibility of court proceedings.
6. Such further and other grounds as counsel may advise and this Honourable Court may permit.

Material or evidence to be relied on:

7. Secretarial Affidavit No. 3 of Kim Picard, sworn January 8, 2025.
8. Any other materials and pleadings previously filed in the within proceedings.
9. Such further and other material or evidence as counsel may advise and this Honourable Court permits.

Applicable rules:

10. *Alberta Rules of Court*, AR 124/2010, in particular Part 6, Division 4.
11. *Bankruptcy and Insolvency General Rules*, CRC, c 368.
12. Such further and other rules as counsel may advise and this Honourable Court permits.

Applicable Acts and regulations:

13. *Companies' Creditors Arrangement Act*, RSC 1985, c C-36.
14. Such further and other legislation as counsel may advise and this Honourable Court permits.

Any irregularity complained of or objection relied on:

15. None.

How the application is proposed to be heard or considered:

16. The Applicant proposes that this Application be heard before the Honourable Justice Feasby on January 16 and 17, 2025, at 10:00 a.m. both days sitting on the Commercial List, via WebEx video conference (and in person if the Court so approves), which appearance has been scheduled with the Commercial Coordinator, on affidavit evidence with some or all of the parties present.

WARNING

If you do not come to Court either in person or by your lawyer, the Court may give the applicant what they want in your absence. You will be bound by any order that the Court makes. If you want to take part in this application, you or your lawyer must attend in Court on the date and at the time shown at the beginning of the form. If you intend to rely on an affidavit or other evidence when the application is heard or considered, you must reply by giving reasonable notice of the material to the applicant.

SCHEDULE "A"
SERVICE LIST

SCHEDULE "A" – SERVICE LIST

Action No. 2401-15969

Last Update Dec. 20, 2024

SERVICE RECIPIENT	RECIPIENT STATUS	SERVICE VIA
<p>FASKEN MARTINEAU DUMOULIN LLP First Canadian Centre 350 - 7th Avenue SW, Suite 3400 Calgary, AB T2P 3N9 Attention: Robyn Gurofsky Email: rgurofsky@fasken.com Attention: Kaitlyn Wong Email: kwong@fasken.com Assistant: Kim Picard Email: kpocard@fasken.com</p>	Representative Counsel to Canadian Investors	Email
<p>NORTON ROSE FULBRIGHT CANADA LLP 400 3rd Ave SW, Suite 3700 Calgary AB T2P 4H2 Attention: Howard Gorman Email: howard.gorman@nortonrosefulbright.com Attention: Daniel Stethem Email: daniel.stethem@nortonrosefulbright.com</p>	Representative Counsel to Offshore Investors	Email
<p>AZIMUTH RISK MANAGEMENT LTD. 710, 7015 Macleod Trail SW Calgary, AB T2H 2K6 Attention: David Murphy Email: dmurphy@foxbridgegroup.com</p>		Email
<p>PILLAR CAPITAL CORP. Parkside Place Suite 920, 602 – 12th Avenue S.W. Calgary, AB T2R 1J3 Attention: Steve Dizep Email: sdizep@pillarcapitalcorp.com Attention: Rick Lutz Email: rlutz@pillarcapitalcorp.com Attention: Keaton O'Brien Email: kobrien@pillarcapitalcorp.com</p>	Interim Lender	Email
<p>BENNETT JONES LLP 4500 Bankers Hall East 855 – 2nd Street SW Calgary, Alberta T2P 4K7 Attention: Kelsey Meyer Email: meyerk@bennettjones.com Attention: Keely Cameron Email: cameronk@bennettjones.com Attention: Luc Rollingson Email: rollingsonl@bennettjones.com</p>		Email

SERVICE RECIPIENT	RECIPIENT STATUS	SERVICE VIA
<p>CASSELS Suite 3810, Bankers Hall West 888 3rd Street SW Calgary AB T2P 5C5 Attention: Jeffrey Oliver Email: joliver@cassels.com Attention: Danielle Marechal Email: dmarechal@cassels.com Attention: Natalie Thompson Email: nthompson@cassels.com Attention: Danica Jorgenson Email : djorgenson@cassels.com Assistant: Angeline Gagnon Email: agagnon@cassels.com</p>	<p>Counsel to Alvarez & Marsal Canada Inc.</p>	<p>Email</p>
<p>TORYS 525 – 8th Avenue S.W., 46th Floor Eighth Avenue Place East Calgary, AB T2P 1G1 Canada Attention: Kyle Kashuba Email: kkashuba@torys.com</p>	<p>Counsel to Pillar Capital, the Interim Lender</p>	<p>Email</p>
<p>REED SMITH LLP 2850 N Harwood St Suite 1500, Dallas, TX 75201, United States Attention: Keith Aurzada Email: KAurzada@reedsmith.com Attention: Michael Cooley Email: mpcooley@reedsmith.com</p>	<p>US Counsel to Alvarez & Marsal Canada Inc.</p>	<p>Email</p>
<p>ALVAREZ & MARSAL CANADA INC. Suite 1110, 250 6th Ave SW 888 3rd Street SW Calgary AB T2P 3H7 Attention: Orest Konowalchuk Email: okonowalchuk@alvarezandmarsal.com Attention: Duncan MacRae Email: dmacrae@alvarezandmarsal.com</p>	<p>Monitor</p>	<p>Email</p>
<p>METCALFE, BLAINEY & Burns LLP 18 Crown Steel Dr #202 Markham, ON L3R 9X9 Attention: Sammy Lee Email: sammylee@mbb.ca Attention: Jonathan Ku Email: jonathanku@mbb.ca Attention: Stephen Barbier Email: stephenbarbier@mbb.ca</p>	<p>ON Counsel to A2A Group</p>	<p>Email</p>

SERVICE RECIPIENT	RECIPIENT STATUS	SERVICE VIA
MILES DAVIDSON LLP 900, 517 – 10 Avenue SW Calgary, AB T2R 0A8 Attention: Daniel Jukes Email: djukes@milesdavidson.com	Co-Counsel with A2A Group ON	Email
ANGUS A2A GP INC. 1600, 333 – 7 th Ave SW Calgary, AB T2P 2Z1 Email: cores@burstall.com	Respondent	Email
ANGUS MANOR PARK A2A GP INC. 1600, 333 – 7 th Ave SW Calgary, AB T2P 2Z1 Email: cores@burstall.com	Respondent	Email
ANGUS MANOR PARK A2A DEVELOPMENTS INC. 2030 Bristol Circle, 210 Oakville, ON L6H 6P5	Respondent	Courier
HILLS OF WINDRIDGE A2A TRUST Registered and Head office of the trust: 250 Ferrand Drive, Suite 888 Toronto ON M3C 3G8	Respondent	Courier
WINDRIDGE A2A DEVELOPMENTS, LLC c/o Bodkin, Niehaus, Dorris, and Jolley PLLC 111, 6021 Morriss Road Flower Mound TX, 75028 Attention: Nick Lind Email: info@tbtextlaw.com	Respondent	Courier/Email
HILLS OF WINDRIDGE A2A GP INC. 2030 Bristol Circle Oakville, ON L6H 6P5	Respondent	Courier
FOSSIL CREEK A2A GP INC. Suite 900, 744 – 4 Ave SW Calgary, AB T2P 3T4 Email: allan.lind@serenehomes.com	Respondent	Email
FOSSIL CREEK A2A DEVELOPMENTS, LLC c/o Bodkin, Niehaus, Dorris, and Jolley PLLC 111, 6021 Morriss Road Flower Mound TX, 75028 Attention: Nick Lind Email: info@tbtextlaw.com	Respondent	Courier/Email

SERVICE RECIPIENT	RECIPIENT STATUS	SERVICE VIA
FOSSIL CREEK A2A TRUST c/o Grayson Ambrose, Trustee Email: grayson@dalcastle.ca	Respondent	Email
A2A DEVELOPMENTS INC. 2030 Bristol Circle, 210 Oakville, ON L6H 6P5	Respondent	Courier
SERENE COUNTRY HOMES (CANADA) INC. c/o Grayson Ambrose, Director Email: grayson@dalcastle.ca	Respondent	Email
A2A CAPITAL SERVICES CANADA INC. c/o Grayson Ambrose, Director Email: grayson@dalcastle.ca	Respondent	Email
CANADA REVENUE AGENCY Surrey National Verification and Collections Centre 9755 King George Boulevard Surrey BC V3T 5E1 Fax (toll-free): 1-833-697-2390	CRA	Fax
OFFICE OF THE SUPERINTENDENT OF BANKRUPTCY Harry Hays Building 220 4th Ave SE, Suite 478 Calgary AB T2G 4X3 Email: osbservice-bsfservice@ised-isde.gc.ca	OSB	Email
GRAYSON AMBROSE 234 Evanscreek Court NW Calgary, AB T3P 1H4 Email: grayson@dalcastle.ca	Director	Email
LUKE MICHAEL KOK MENG FOO 54 Coronation Rd West #01-01 Singapore 269266, Singapore	Director	Courier
JOSEPH F. ATTRUX 11425 Coburn Hills Pass Fort Worth, TX 76108, USA 2030 Bristol Circle, 210 Oakville, ON L6H 6P5 Email: joe.attrux@rccconsulting.ca	Director and Officer	Email/Courier

SERVICE RECIPIENT	RECIPIENT STATUS	SERVICE VIA
ALLAN WHITEFORD LIND 121 Meyer Rd, The Makena #10-08 Singapore, 437932, Singapore 7340 Cascade Court Unit 1122 Forth Worth, TX 76137, USA Email: allan.lind@serenehomes.com	Director and Officer	Email
ANNE LAW 4950 Yonge St, Madison Centre 910 Toronto, ON M2N 6K1	Officer	Courier
DIRK FOO 121 Meyer Rd, 10-08 Singapore, 437932, Singapore Email: dirk.foo@serenehomes.com	Director	Email
ALEXI OLCHESKI 2011 – 25 th Ave SW Calgary, AB T2T 1A6	Director	Courier
REGISTRAR OF CORPORATION ALBERTA REGISTRIES CORPORATIONS BRANCH John E. Brownlee Bldg 10365 – 97 th St Edmonton, AB T5J 3W7	AB Corporate Registry	Courier
BUSINESS AND PERSONAL PROPERTY BRANCH 393 University Avenue, Suite 200 Toronto, ON M5G 2M2	ON Business Registry	Courier
BLOOMFIELD HOMES LP 1900 W Kirkwood Blvd. Ste 2300B Southlake, TX 76092	Interested Party	Courier
Marie Lind Email: marie.lind@serenehomes.com	Interested Party	Email

EMAIL

rgurofsky@fasken.com; kwong@fasken.com; kpocard@fasken.com;
howard.gorman@nortonrosefulbright.com; daniel.stethem@nortonrosefulbright.com;
dmurphy@foxbridgegroup.com; sdizep@pillarcapitalcorp.com; rlutz@pillarcapitalcorp.com;
kobrien@pillarcapitalcorp.com; joliver@cassels.com; dmarechal@cassels.com;
nthompson@cassels.com; djorgenson@cassels.com; agagnon@cassels.com; kkashuba@torys.com;
KAurzada@reedsmith.com; mpcooley@reedsmith.com; okonowalchuk@alvarezandmarsal.com;
dmacrae@alvarezandmarsal.com; sammylee@mbb.ca; jonathanku@mbb.ca; stephenbarbier@mbb.ca;
djukes@milesdavisson.com; cores@burstall.com; info@tbtexlaw.com; allan.lind@serenehomes.com;

grayson@dalcastle.ca; osbservice-bsfservice@ised-isde.gc.ca; joe.attrux@rccconsulting.ca;
dirk.foo@serenehomes.com; marie.lind@serenehomes.com; meyerk@bennettjones.com;
cameronk@bennettjones.com; rollingsonl@bennettjones.com;

FAX:

1.	CANADA REVENUE AGENCY 1-833-697-2390
----	--

SCHEDULE "B"

ORDER

COURT FILE NUMBER 2401-15969
COURT COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY

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

AND IN THE MATTER OF THE COMPROMISE OR
ARRANGEMENT OF ANGUS A2A GP INC., ANGUS
MANOR PARK A2A GP INC., ANGUS MANOR PARK A2A
CAPITAL CORP., ANGUS MANOR PARK A2A
DEVELOPMENTS INC., HILLS OF WINDRIDGE A2A GP
INC., WINDRIDGE A2A DEVELOPMENTS, LLC, FOSSIL
CREEK A2A GP INC., FOSSIL CREEK A2A
DEVELOPMENTS, LLC, A2A DEVELOPMENTS INC.,
SERENE COUNTRY HOMES (CANADA) INC. and A2A
CAPITAL SERVICES CANADA INC.

DOCUMENT **ORDER: RESTRICTED COURT ACCESS**

APPLICANT **CANADIAN REP COUNSEL on behalf of CANADIAN
INVESTORS (BOTH AS DEFINED IN THE AMENDED
AND RESTATED INITIAL ORDER)**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
Fasken Martineau DuMoulin LLP
Barristers and Solicitors
3400 First Canadian Centre
350 – 7th Avenue SW
Calgary, Alberta T2P 3N9

Attention: Robyn Gurofsky / Kaitlyn Wong
Phone: (403) 261-9469 / (403) 261-9469
Email: rgurofsky@fasken.com / kwong@fasken.com

File Number: 321102.00017

DATE ON WHICH ORDER WAS PRONOUNCED: January 16, 2025
LOCATION OF HEARING: Calgary Courts Centre
NAME OF JUSTICE WHO MADE THIS ORDER: The Honourable Justice C. Feasby

UPON the Application of Canadian Rep Counsel on behalf of Canadian Investors seeking an order sealing Confidential Exhibit "A" to Secretarial Affidavit No. 3 of Kim Picard, sworn

January 8, 2025 (the “**Third Picard Affidavit**”); **AND UPON** having read the Application of Canadian Rep Counsel, the Third Picard Affidavit, and the other pleadings and materials previously filed in the within proceedings; **AND UPON** hearing Canadian Rep Counsel, counsel for the Monitor, counsel for the Debtor Companies, Offshore Rep Counsel, and other counsel in attendance at the hearing;

IT IS HEREBY ORDERED AND DECLARED THAT:

1. All defined terms used herein have the meanings ascribed to them in the Amended and Restated Initial Order, granted November 25, 2024 (the “**ARIO**”).

SERVICE

2. Service of notice of this Application and materials in support of this Order is hereby declared good and sufficient, and the time for service of this Application and supporting materials is hereby abridged to the time actually given and the Application is properly returnable today.

RESTRICTED COURT ACCESS

3. Confidential Exhibit “A” to the Third Picard Affidavit shall immediately be sealed by the Clerk of the Court, kept confidential and shall not form part of the public record, and not be available for public inspection unless otherwise ordered by this Court.
4. Confidential Exhibit “A” to the Third Picard Affidavit shall be sealed and filed in an envelope containing the following statement thereon:

THIS ENVELOPE CONTAINS CONFIDENTIAL EXHIBIT “A” TO SECRETARIAL AFFIDAVIT NO. 3 OF KIM PICARD, SWORN JANUARY 8, 2025, WHICH SHALL BE SEALED ON THE COURT RECORD AND IS NOT TO BE PLACED ON THE PUBLIC RECORD OR MADE PUBLICLY ACCESSIBLE UNTIL FURTHER ORDER OF THIS COURT.

5. In the event an interested party wishes to unseal the contents of Confidential Exhibit “A” to the Third Picard Affidavit, such interested party may bring an application to Court in the

within proceedings on no less than 7 days' notice to the Monitor and Canadian Rep Counsel.

6. Service of this Order shall be deemed good and sufficient by serving the same on:
 - a. the persons listed on the service list created in these proceedings;
 - b. any other person served with notice of the Application for this Order;
 - c. any other parties attending or represented at the Application for this Order; and
 - d. posting a copy of this Order on the Monitor's website at:
<https://www.alvarezandmarsal.com/A2A>,

and service on any other person is hereby dispensed with.

7. Service of this Order may be effected by facsimile, electronic mail, personal delivery, or courier. Service is deemed to be effected the next business day following transmission or delivery of this Order.

Justice of the Court of King's Bench of Alberta