COURT FILE NUMBER   2401-02438

COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE   CALGARY

APPLICANT   BANK OF MONTREAL

RESPONDENTS   AMC&F PROPERTIES LTD. AND LYNCORP MANUFACTURING LTD.

DOCUMENT   **SEALING ORDER**

PARTY FILING THIS DOCUMENT   BANK OF MONTREAL

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT   BLAKE, CASSELS & GRAYDON LLP
3500, 855 – 2nd Street S.W.
Calgary, Alberta T2P 4J8

Attention: Christopher Keliher

Telephone: 403-260-9760

Email: christopher.keliher@blakes.com

DATE ON WHICH ORDER WAS PRONOUNCED: February 26, 2024

LOCATION WHERE ORDER WAS PRONOUNCED: Calgary Courts Centre

NAME OF JUSTICE WHO MADE THIS ORDER: The Honourable Justice M.H. Hollins

      UPON THE ORIGINATING APPLICATION of Bank of Montreal ("**BMO**") in its capacity as the senior secured lender of the Respondents, AMC&F Properties Ltd. and Lyncorp Manufacturing Ltd. (together, the "**Debtors**") seeking the appointment of Alvarez & Marsal Canada Inc. ("**A&M**") as receiver and manager (in such capacity, the "**Receiver**") pursuant to section 243 of the *Bankruptcy and Insolvency Act,* RSC 1985, c B-3, as amended, over the current and future assets, undertakings and properties of the Debtors;

      AND UPON having read the Originating Application, the Affidavit of Trevor Bauer affirmed February 15**,** 2024 (the "**Bauer Affidavit**"), and the Confidential Exhibits thereto (the "**Confidential Exhibits**");

AND UPON hearing counsel for BMO and any other interested parties in attendance at the Application;

IT IS HEREBY ORDERED THAT:

SERVICE

1.   The time for service of the notice of application for this Sealing Order (the "**Order**") is hereby abridged and deemed good and sufficient and this application is properly returnable today.
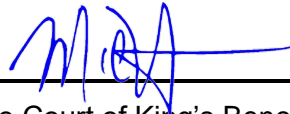
SEALING

2.   Notwithstanding Division 4 of Part 6 of the *Alberta Rules of Court*, Alta Reg 124/2010, the Confidential Exhibits shall be sealed on the Court file, not form part of the public record, and not be available for public inspection until the closing of a sale of all or substantially all of the assets of the Debtors, until the receivership proceedings conclude, or further order by this Court, upon seven days' notice to all interested parties, whichever is earlier.

3.   The Clerk of the Court shall file the Confidential Exhibits in a sealed envelope attached to a notice that sets out the style of cause of these proceedings and states:

> THIS ENVELOPE CONTAINS CONFIDENTIAL MATERIALS FILED BY BANK OF MONTREAL. THESE CONFIDENTIAL MATERIALS ARE SEALED UNTIL A CLOSING OF A SALE OF ALL OR SUBSTANTIALLY ALL OF THE ASSETS OF THE DEBTORS, UNTIL THE RECEIVERSHIP PROCEEDINGS CONCLUDE, OR FURTHER ORDER BY THIS COURT, WHICHEVER IS EARLIER.

GENERAL

4.   The Receiver is empowered and authorized to, but not directed to, provide the Confidential Exhibits (or any portion thereof, or information contained therein) to any interested party that the Receiver considers reasonable in the circumstances, subject to confidentiality arrangements satisfactory to the Receiver.

5.   Leave is hereby granted to any person, entity or party affected by this Order to apply to this Court for a further Order vacating, substituting, modifying or varying the terms of this Order, with such application to be brought on seven (7) days' notice to the Receiver and any other affected party in accordance with the *Alberta Rules of Court,* Alta Reg 124/2010 and this Order.

6. This Order must be served only upon those interested parties attending or represented at the within application and service may be affected by facsimile, electronic mail, personal delivery or courier. Service is deemed to be affected the next business day following the transmission of such documents.

7. Service of this Order on any party not attending this application is hereby dispensed with.

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Justice of the Court of King's Bench of Alberta