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Clerk's Stamp

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2401-15969

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CALGARY

DIGITALLY 2401 15969

Jan 13, 2025

IN THE MATTER OF THE COMPANIES CREDITORS ARRANGEMENT ACT, RSC 1985, c. CONTRACT 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, LCC, A2A DEVELOPMENTS INC., SERENE COUNTRY HOMES (CANADA) INC. and A2A CAPITAL SERVICES CANADA INC.

PARTY FILING THIS DOCUMENT:

NORTON ROSE FULBRIGHT CANADA LLP, in its capacity as "Offshore Rep Counsel" in these CCAA proceedings

DOCUMENT

SECRETARIAL AFFIDAVIT

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT:

Norton Rose Fulbright Canada LLP 400 3rd Avenue SW, Suite 3700 Calgary, AB T2P 4H2

Howard Gorman, K.C. Howard.gorman@nortonrosefulbright.com Tel: +1 403.267.8222

Fax:+1 403.264.5973

File no. 1001326712



AFFIDAVIT OF EMMA LISSON

Sworn on January 13, 2025

- I, Emma Lisson, of the City of Calgary, in the Province of Alberta, SWEAR AND SAY:
- 1. I am a Legal Assistant at the law firm Norton Rose Fulbright Canada LLP ("Offshore Rep Counsel" in the above-noted proceedings). As such, I have personal knowledge of the facts and matters herein deposed to, except where stated to be based on information and belief, and where so stated, I verily believe the same to be true.
- 2. I adopt the defined terms set out in the Amended and Restated Initial Order granted in these proceedings on November 25, 2024.
- 3. I am advised by Mr. Howard Gorman, a partner at Norton Rose Fulbright Canada LLP, that since our first Secretarial Affidavit was filed in these proceedings on December 13, 2024, we have received additional responses from the Offshore Investors. The updated response figures are set out below.
- 4. I am advised by Mr. Gorman and do verily believe that we have received responses from 303 Offshore Investors (the **Responsive Offshore Investors**) as of January 10th, 2025.
- 5. I am advised by Mr. Gorman and do verily believe the Responsive Offshore Investors reported that they represent investments in various A2A Group (and A2A Group related) projects, including The Hills of Windridge, Fossil Creek, Angus Manor, Wingham Creek, Meaford Highlands Resort, Lake Huron Shores, Sendera Ranch, Green Valley Estates, Clearview Park, Bridle Park, and Niagara Falls Park.
- 6. I am advised by Mr. Gorman and do verily believe the Responsive Offshore Investors reported that they represent approximately \$8,910,462 (USD), \$4,649,021 (CAD), \$31,250 (MYR) in total investments in various A2A Group projects.
- 7. I am advised by Mr. Gorman and do verily believe that certain of the Responsive Offshore Investors reported that they they've been repaid only approximately \$300,796.37 (USD), \$56,599.93 (CAD), \$23,148 (SGD), RM 52,503 (MYR), and €24,739 (EUR) by the A2A

Group to date. A single Responsive Offshore Investor also reported receiving repayment of \$1,238.00 and \$1,710.00 in an unspecified currency.

8. I am advised by Mr. Gorman and do verily believe that, of the Responsive Offshore Investors, 299 responded no to whether they have received satisfactory updates from the A2A Group regarding their investments in the last 6 years. Only 1 responded yes to this question and 3 did not respond.

9. I am advised by Mr. Gorman and do verily believe that, of the Responsive Offshore Investors, 291 responded yes to whether they support Alvarez and Marsal as the Court Appointed Monitor to investigate and report with respect to the Offshore Investor's investments and the A2A Group's financial affairs, while 5 responded no to this question and 7 did not respond.

10. I am advised by Mr. Gorman and do verily believe that, of the Responsive Offshore Investors, 281 responded no to whether they were supportive of the A2A Group's handling of their investment to date, while 12 responded yes to this question and 10 did not respond.

11. I am advised by Mr. Gorman and do verily believe that, of the Responsive Offshore Investors, 219 responded yes to whether they had requested information or updates that have not been provided, while 75 responded no to this question and 9 did not respond.

12. This affidavit is prepared in respect of the Monitor's Application scheduled to be heard January 17th, 2025.

SWORN BEFORE ME at the City of Calgary, Alberta, this 13th day of January, 2025

FMMALISSON

Armaan Dhillon Student at Law