

Clerk's Stamp



COURT FILE NUMBER 1403 18264

COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE EDMONTON

PLAINTIFF HSBC BANK CANADA

DEFENDANTS VISIONARY MOTORSPORTS LTD., 1211311 ALBERTA LTD., JASON DE CHAMPLAIN, NEIL VANDERKOOI AND WAYNE ROBERTSON

DOCUMENT ORDER

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

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Lawyer: Kentigern A. Rowan Q.C.

I hereby certify this to be a true copy of the original.

Handwritten signature of the Clerk of the Court.

DATE ON WHICH ORDER WAS PRONOUNCED: Tuesday, February 5, 2019

LOCATION WHERE ORDER WAS PRONOUNCED: Edmonton, Alberta

NAME OF JUSTICE WHO MADE THIS ORDER: The Honourable Justice Feehan

UPON the application of Deloitte Restructuring Inc. in their capacity as former Court Appointed Receiver (the "Receiver") of Visionary Motorsports Ltd. ("Visionary"); AND UPON reviewing the Supplemental Report of the Receiver; AND UPON reviewing the terms of the Order of April 11, 2017 granted in these proceedings and respecting the Visionary Records and the Non-Visionary Records as defined in the said Order; AND UPON hearing from counsel for the Receiver, counsel for HSBC and counsel for the individual Defendants in these proceedings; AND UPON being informed that the said counsel are in agreement with this form of order; IT IS HEREBY ORDERED AND DECLARED THAT:

- 1. The Receiver be and is hereby authorized to deliver the Visionary Records and the Non-Visionary Records (collectively, the "Records") in its possession to Dentons Canada LLP ("Dentons"), counsel for HSBC.
2. Upon delivery of the Records to Dentons Canada LLP as directed pursuant to this Order, the Receiver shall have no further responsibility with respect to the Records.
3. Subject to paragraph 4, Dentons shall maintain possession of the Records until further Order of this Court on application by HSBC or any other interested party. This Order is granted without prejudice to HSBC making a future application to the Court in these proceedings seeking an

Order directing that the Records be placed in the possession of Visionary and/or the other Defendants in this Action.

4. Dentons shall be entitled, in its sole discretion, to release the Records to an off-site third party document storage provider for the purpose of storing the Records.
5. Dentons and HSBC shall not examine or copy the Records.
6. Dentons shall make the Records available to the Defendants for the purposes of reviewing and/or copying the Records within 20 days of a request by the Defendants to access the Records being made to Dentons in writing,



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J.C.Q.B.A.

Justice K.P. Feehan