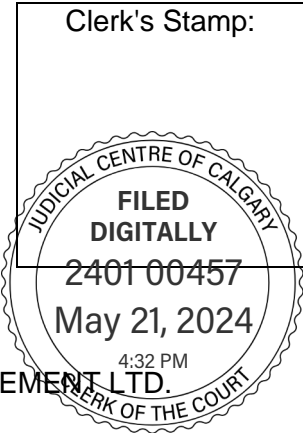


COURT FILE NUMBER 2401-00457
 COURT COURT OF KING'S BENCH OF ALBERTA
 JUDICIAL CENTRE CALGARY
 APPLICANTS CATALX CTS LTD. and HYUK JAE PARK
 RESPONDENTS CATALX CTS LTD. and CATALX MANAGEMENT LTD.
 DOCUMENT **APPLICATION (Approval of Receiver's Activities)**



Burnet, Duckworth & Palmer LLP
 2400, 525 – 8 Avenue SW
 Calgary, Alberta T2P 1G1
 Attention: David LeGeyt / Ryan Algar
 Phone Number: (403) 260-0210 / 0126
 Fax Number: (403) 260-0332
 Email Address: dlegeyt@bdplaw.com
 ralgar@bdplaw.com
 File No. 75083-3

NOTICE TO RESPONDENT(S): SEE SERVICE LIST

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

DATE: May 28, 2024
 TIME: 2:00 PM
 WHERE: Calgary Courts Centre, via Webex
 Virtual Courtroom 60:
<https://albertacourts.webex.com/meet/virtual.courtroom60>
 BEFORE WHOM: The Honourable Justice R.A. Neufeld

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

Remedy claimed or sought:

1. Deloitte Restructuring Inc. ("**DRI**") in its capacity as receiver (DRI in such capacity, the "**Receiver**") of CatalX CTS Ltd. ("**CatalX**") and Catalx Management Ltd. ("**CML**" and together with CatalX, the "**Debtors**"), seeks an Order, substantially in the form attached hereto as **Schedule "A"**:
 - (a) if necessary, abridging the time for service of the within Application and deeming service to be good and sufficient;
 - (b) approving the actions of the Receiver and those of its legal counsel to date, as set out in the First Report of the Receiver dated May 21, 2024, (the "**First Report**");
 - (c) approving the professional fees, receipts and disbursements of the Receiver, and those of the Receiver's legal counsel, as set out in the First Report; and
 - (d) such further and other relief, advice and directions as counsel may advise and this Honourable Court may deem just and appropriate.

Grounds for making this application:**Background**

2. Capitalized terms not otherwise defined in this Application have the meaning set forth in the First Report.
3. Pursuant to an Order of the Honourable Justice R.A. Neufeld granted on January 19, 2024 (the "**Receivership Order**"), the Receiver was appointed receiver, without security, of all of the Debtors' current and future assets, undertakings and properties of every nature and kind whatsoever, and wherever situate, including all proceeds (the "**Property**").
4. The Receivership Order empowers and authorizes, but does not obligate, the Receiver to, among other things, manage, operate and carry on the business of the Debtor and to take possession and control of the Property and any and all proceeds, receipts and disbursements arising out of or from the Property.

Approval of Receiver's Activities and Distribution

5. The Receiver's activities since the granting of the Receivership Order, including the engagement of Deloitte LLP, are set forth in greater detail set forth and described in the First Report. The Receiver has managed the Debtors' Property and estate in good faith and with due diligence.
6. All of the actions in respect of the fees and disbursements incurred by the Receiver and its legal counsel during the course of the administration of the within proceedings are reasonable and have been validly incurred in connection with the conduct of the Receiver's obligations herein and as required by law and the Orders granted in these proceedings.
7. Such further and other grounds as counsel may advise and this Honourable Court may permit.

Material or evidence to be relied on:

8. The First Report of the Receiver, to be filed.
9. The other pleadings and materials filed in this Action and such further and other material as counsel may advise and this Honourable Court may permit.

Applicable Rules:

10. Rules 1.3, 1.4, 6.3, and 13.5(2) of the *Rules of Court*.
11. Such further and other rules as counsel may advise and this Honourable Court may permit.

Applicable Acts and Regulations:

12. *Judicature Act*, RSA c J-2.
13. *Business Corporations Act*, RSA 2000, c B-9.
14. *Law and Equity Act*, RSBC 1996 c 253.
15. Such further and other Acts and Regulations as counsel for the Receiver may advise or this Honourable Court may permit.

Any irregularity complained of or objection relied on:

16. Not Applicable.

How the application is proposed to be heard or considered:

17. Via Webex, before the Honourable Justice R.A. Neufeld on the Commercial List.

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 give evidence in response to the application, you must reply by filing an affidavit or other evidence with the Court and serving a copy of that affidavit or other evidence on the Applicant a reasonable time before the application is to be heard or considered.

SCHEDULE "A"
APPROVAL ORDER

COURT FILE NUMBER 2401-00457
COURT COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY
APPLICANTS CATALX CTS LTD. and HYUK JAE PARK.
RESPONDENTS CATALX CTS LTD. and CATALX MANAGEMENT LTD.
DOCUMENT **ORDER (Approval of Receiver's Fees and Activities)**

Clerk's Stamp:

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
Burnet, Duckworth & Palmer LLP
2400, 525 8 Ave SW
Calgary, Alberta T2P 1G1
Lawyer: David LeGeyt / Ryan Algar
Phone Number: (403) 260-0210 / 0126
Fax Number: (403) 260-0332
Email Address: dlegeyt@bdplaw.com / ralgar@bdplaw.com
File No.: 75083-3

DATE ON WHICH ORDER WAS PRONOUNCED: May 28, 2024
NAME OF JUDGE WHO MADE THIS ORDER: The Honourable Justice R.A. Neufeld
LOCATION OF HEARING: Calgary Court Centre

UPON THE APPLICATION of Deloitte Restructuring Inc. in its capacity as the Court-appointed receiver (the "**Receiver**") of the assets, undertakings and properties of CatalX CTS Ltd. ("**CatalX**") and Catalx Management Ltd. ("**CML**" and together with CatalX, the "**Debtors**"), ; **AND UPON** having read the First Report of the Receiver dated May 21, 2024 (the "**First Report**"); **AND UPON** hearing counsel for the Receiver and counsel for other parties present;

AND UPON being satisfied that it is appropriate to do so, **IT IS ORDERED THAT;**

1. Service of notice of this application and supporting materials is hereby declared to be good and sufficient, and no other person is required to have been served with notice of this application, and time for service of this application is abridged to that actually given.
2. Capitalized terms not otherwise defined herein shall have the meaning set forth in the First Report.

Approval of Accounts & Activities

3. The Receiver's accounts for fees and disbursements, as set forth in the First Report, are hereby approved without the necessity of a formal passing of its accounts.
4. The accounts of the Receiver's legal counsel, Burnet, Duckworth & Palmer LLP, for its fees and disbursements, as set forth in the First Report, are hereby approved without the necessity of a formal assessment of its accounts.
5. The Receiver's activities as set out in the First Report and the Statement of Receipts and Disbursements as attached to the First Report, are hereby ratified and approved.

Service

6. This Order must be served only upon those interested parties attending or represented at the within application and service may be effected by Facsimile, electronic mail, personal delivery or courier. Service is deemed to be effected the next business day following the transmission or delivery of such documents.
7. Service of this Order on any party not attending this application is hereby dispensed with.

Justice of the Court of King's Bench of Alberta