



No. S-220231
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY AND INSOLVENCY**

**IN THE MATTER OF THE RECEIVERSHIP OF
OTSO GOLD CORP.**

BETWEEN:

**PANDION MINE FINANCE LP, RIVERMET RESOURCE CAPITAL LP
AND PFL RAAHE HOLDINGS LP**

PETITIONERS

AND:

OTSO GOLD CORP.

RESPONDENT

APPLICATION RESPONSE

Application response of: Pandion Mine Finance LP, Rivermet Resource Capital LP, and PFL Raahe Holdings LP (collectively, the "**Pandion Respondents**")

THIS IS A RESPONSE TO the Notice of Application filed by Deloitte Restructuring Inc., in its capacity as the court-appointed receiver and receiver manager (in such capacity, the "**Receiver**") of the assets, undertakings and properties of Otso Gold Corp., on October 13, 2022 (the "**Application**").

PART 1: ORDERS CONSENTED TO

The Pandion Respondents consent to the granting of **ALL** of the orders set out in Part 1 of the Application.

PART 2: ORDERS OPPOSED

The Pandion Respondents oppose the granting of **NONE** of the orders set out in Part 1 of the Application.

PART 3: ORDERS ON WHICH NO POSITION IS TAKEN

The Pandion Respondents take no position on **NONE** of the orders set out in Part 1 of the Application.

PART 4: FACTUAL BASIS

1. The Pandion Respondents adopt the factual basis set out in Part 2 of the Application.

PART 5: LEGAL BASIS

1. The Pandion Respondents adopt the legal basis set out in Part 3 of the Application.

PART 6: MATERIAL TO BE RELIED ON

1. The Receiver's First Report, dated April 6, 2022;
2. The Receiver's Second Report, dated October 12, 2022; and
3. Such further and other materials as counsel may advise.

The Pandion Respondents estimate that the application will take 30 minutes.

The Pandion Respondents have filed in this proceeding a document that contains their address for service.

October 19, 2022
Dated



Signature of Lawyer for Application Respondent,
Pandion Mine Finance

Joseph Bellissimo and Jared Enns
Cassels Brock & Blackwell LLP