



NO. FOS-S-S-24867
FORT ST. JOHN REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

THE BANK OF NOVA SCOTIA

PETITIONER

AND:

GRABHERS LAST STAND BISON RANCH LTD., DWAYNE
GRABHER AND CHELSEA GRABHER ALSO KNOWN AS
CHELSEA FOILLARD

RESPONDENTS

ORDER MADE AFTER APPLICATION

DISCHARGE ORDER

BEFORE THE HONOURABLE

JUSTICE TINDALE

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18/NOV/2024

THE APPLICATION of Deloitte Restructuring Inc. (the “**Receiver**”), in its capacity as Court-appointed Receiver and Manager, without security, of all the assets and undertakings of Grabhers Last Stand Bison Ranch Ltd. and certain assets of Dwayne Grabher and Chelsea Grabher, also known as Chelsea Fouillard, coming on for hearing at Prince George, British Columbia, on the 18th day of November, 2024; AND ON HEARING William Roberts, counsel for the Receiver, and no one else appearing although duly served; AND UPON READING the material filed, including the Receiver’s Third Report to Court dated October 9, 2024 (the “**Report**”);

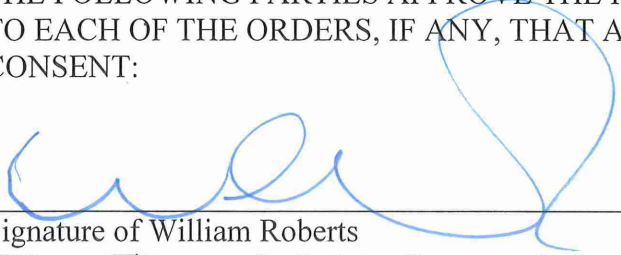
THIS COURT ORDERS AND DECLARES THAT:

1. The activities of the Receiver, as set out in the Report, are hereby approved.

2. The receipts and disbursements of the Receiver, as set out in the Receiver's Statement of Receipts and Disbursements, attached as Appendix "A" to the Report, are hereby approved.
3. The fees and disbursements of the Receiver and its counsel, as set out in the Report and the Affidavit #1 of William Roberts made on October 10, 2024, including estimated fees and disbursements to complete their duties in connection with the receivership, are hereby approved.
4. After payment of the fees and disbursements of the Receiver and its counsel as herein approved, the Receiver shall pay all funds remaining in its hands to The Bank of Nova Scotia, as set out in paragraph 68 of the Report.
5. Upon payment of the amounts set out in paragraph 4 hereof, and upon the Receiver filing a certificate in substantially the form attached hereto as Schedule "A", the Receiver shall be discharged as Receiver of the assets, undertaking and property of Grabbers Last Stand Bison Ranch Ltd., Dwayne Grabher, and Chelsea Grabher, also known as Chelsea Fouillard, provided that notwithstanding its discharge herein: (a) the Receiver shall remain Receiver for the performance of such incidental duties as may be required to complete the administration of the receivership herein; and (b) the Receiver shall continue to have the benefit of the provisions of all Orders made in this proceeding, including all approvals, protections and stays of proceedings in favour of Deloitte Restructuring Inc. in its capacity as Receiver.
6. Deloitte Restructuring Inc. is hereby released and discharged from any and all liability that Deloitte Restructuring Inc. now has or may hereafter have by reason of, or in any way arising out of, the acts or omissions of Deloitte Restructuring Inc. while acting in its capacity as Receiver herein. Without limiting the generality of the foregoing, Deloitte Restructuring Inc. is hereby forever released and discharged from any and all liability relating to matters that were raised, or which could have been raised, in the within receivership proceedings, save and except for any gross negligence or willful misconduct on its part.

7. Notwithstanding any provision herein, this Order shall not affect any person to whom notice of these proceedings was not delivered as required by the *Bankruptcy and Insolvency Act* and regulations thereto, any other applicable enactment or any other Order of this Court.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT:



Signature of William Roberts
☐ Party ☒ Lawyer for Deloitte Restructuring
Inc., in its capacity as Court Appointed Receiver

BY THE COURT

REGISTRAR