



Deloitte Restructuring Inc.  
Queen's Marque  
1741 Lower Water St., Suite 800  
Halifax NS B3J 0J2  
Canada

Tel: +1 (902) 422-8541  
Fax: +1 (902) 423-5820  
[www.deloitte.ca](http://www.deloitte.ca)

December 23, 2024

**TO THE CREDITORS OF ROYAL OAKS GOLF CLUB INC.**

Sir/Madam:

**Subject: Royal Oaks Golf Club Inc. ("Royal Oaks") - in Receivership**

On April 15, 2024, the Court of King's Bench of New Brunswick in Bankruptcy and Insolvency (the "**Court**") granted an order (the "**Receivership Order**") pursuant to Section 33 of the *Judicature Act*, R.S. N.B. 1973, Ch. J-2, Rule 41 of the *Rules of Court* of New Brunswick, and Section 243(1) of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended appointing Deloitte Restructuring Inc. ("**Deloitte**") as the receiver and manager (the "**Receiver**") without security, of all of the assets, undertakings and properties of the Royal Oaks acquired for, or used in relation to a business carried on by Royal Oaks.

On December 17, 2024, the Court granted an order directing the Receiver to solicit claims from all creditors in respect of Royal Oaks for the purpose of identifying those creditors with valid claims in respect to Royal Oaks (the "**Claims Process Order**").

We are enclosing the following documents for your files:

1. Notice to Creditors; and
2. Proof of Claim Form.

Copies of documents listed above will also be made available on the Receiver's webpage at [www.insolvencies.deloitte.ca/en-ca/royaloaks](http://www.insolvencies.deloitte.ca/en-ca/royaloaks).

We trust you will find the above and the enclosed to be in order. If you have any questions, please contact Ian Lewis at [ilewis@deloitte.ca](mailto:ilewis@deloitte.ca) or 902.721.5540.

Sincerely,

**Deloitte Restructuring Inc.**

Acting solely in its capacity as  
Court Appointed Receiver and Manager of Royal Oaks Golf Club Inc.  
And not in its personal or corporate capacity

Per:

**Colleen O'Brien**  
Manager

Enclosures

## SCHEDULE "A"

### IN THE MATTER OF THE RECEIVERSHIP OF ROYAL OAKS GOLF CLUB INC. OF THE CITY OF MONCTON IN THE PROVINCE OF NEW BRUNSWICK

#### NOTICE TO CREDITORS

On April 15, 2024, Deloitte Restructuring Inc. ("**Deloitte**") was appointed by Order of the Court of King's Bench of New Brunswick (the "**Receivership Order**") as the receiver (the "**Receiver**"), without security, of all the personal property of Royal Oaks Golf Club Inc. ("**Royal Oaks**"). On December 17, 2024, the Court granted an Order (the "**Claims Process Order**") directing the Receiver to solicit claims from all creditors in respect of Royal Oaks (a "**Creditor**") for the purposes of identifying those creditors with valid claims in respect of Royal Oaks (a "**Creditor Claim**"), and determination of such Creditor Claims.

Any Creditor having a Creditor Claim in respect of Royal Oaks arising on or before April 15, 2024, of any nature whatsoever, including an unsecured, secured, contingent or unliquidated claim is required to file, in the manner set out in this Notice to Creditors, a Creditor Proof of Claim in the prescribed form (which has been provided to you with this Notice to Creditors) with the Receiver in order to participate in any distribution associated with these proceedings.

Additional copies of the prescribed Creditor Proof of Claim can be obtained by contacting the Receiver via telephone at 902-422-8541 or via email at [royaloaks@deloitte.ca](mailto:royaloaks@deloitte.ca) or it can be downloaded from the Receiver's website at:

[www.insolvencies.deloitte.ca/en-ca/royaloaks](http://www.insolvencies.deloitte.ca/en-ca/royaloaks)

Any Creditor who chooses to file a Creditor Proof of Claim is required to provide whatever documentation they may have to support their Creditor Claim in respect of Royal Oaks, such as contracts, invoices, bills of lading, and shipping receipts, in relation to the goods and/or services provided to Royal Oaks in the appropriate currency under which their Creditor Claim arose.

**All Creditor Proof of Claim forms, together with the required supporting documentation, must be sent by mail, personally delivered, or sent by courier, facsimile or electronic mail to the following contact information on or before 5:00 p.m. (Atlantic Time) on January 31, 2025 (the "Creditor Claims Bar Date").**

Deloitte Restructuring Inc.  
Attn: Ian Lewis  
1741 Lower Water Street, Suite 800  
Halifax, NS B3J 0J2  
Phone: 902-422-8541  
Email: [royaloaks@deloitte.ca](mailto:royaloaks@deloitte.ca)

All creditors must account for the following:

1. All Creditor Claims must be adjusted for any equipment and/or other assets released by Royal Oaks to the Creditor whether by court order or otherwise; and
2. Where a Creditor is claiming an offset against all or a portion of amounts owing to Royal Oaks, full particulars of the offset must be included.

**All Creditor Claims received by the Receiver after the Creditor Claims Bar Date will, unless otherwise ordered by the Court, be forever extinguished and barred.**

The Receiver will accumulate the Creditor Proof of Claim forms and, in due course, provide to the Creditor a notice in writing by registered mail, courier, facsimile or electronic mail as to whether their Creditor Claim is accepted, or disputed in whole or in part, and indicating the reason for the dispute pursuant to a Creditor Notice of Revision or Disallowance.

Where a Creditor objects to a Creditor Notice of Revision or Disallowance, the Creditor shall notify the Receiver of its objection in writing (the "**Creditor Dispute Notice**") within 14 days from the date the Creditor Notice of Revision or Disallowance was received.

The Receiver will attempt to consensually resolve disputes with respect to any Creditor Claim. If the dispute cannot be resolved, the Creditor will be required to bring an application before the Court for the determination of the Creditor Claim.

**A creditor that does not provide to the Receiver a Creditor Dispute Notice to a Creditor Notice of Revision or Disallowance issued by the Receiver shall, unless otherwise ordered by the Court, be conclusively deemed to have accepted the assessment of its Creditor Claim as set out in such Creditor Notice of Revision or Disallowance.**

**DATED** at Halifax, Nova Scotia, this 23<sup>rd</sup> day of December 2024.

**DELOITTE RESTRUCTURING INC.,**

solely in its capacity as Court-appointed Receiver  
and Manager of Royal Oaks Golf Club Inc.  
and not in its personal or corporate capacity

Per:



---

James Foran, CPA, CA, CIRP, LIT  
Senior Vice President

**BANKRUPTCY AND INSOLVENCY ACT**  
**PROOF OF CLAIM FORM**

Sections 50.1, subsections 65.2(4), 81.2(1), 81.3(8), 81.4(8), 102(2), 124(2) and 128(1), and paragraphs 51(1)(e) and 66.14(b) of the Act

---

All notices or correspondence regarding this claim are to be forwarded to the following address:

---

In the matter of the receivership of Royal Oaks Golf Club Inc., of the City of Moncton, in the Province of New Brunswick and the claim of \_\_\_\_\_.

I, \_\_\_\_\_ residing in the City/Town of \_\_\_\_\_ in the Province of \_\_\_\_\_, do hereby certify that:

1. I am a creditor of the above-selected debtor.
2. I have knowledge of all circumstances connected with the claim referred to below.
3. The debtor was, at the date of the receivership, namely the 15<sup>th</sup> **day of April, 2024**, and still is indebted to the above-named creditor in the sum of \$\_\_\_\_\_ as specified in the statement of account (or affidavit) attached and marked **Schedule "A"** after deducting any counterclaims to which the debtor is entitled. *(The attached statement of account or affidavit must specify the vouchers or other evidence in support of the claim.)*
4. Complete appropriate category:
  - A. UNSECURED CLAIM of \$\_\_\_\_\_  
That in respect of this debt, I do not hold any assets of the debtor as security and:
    - Regarding the amount of \$\_\_\_\_\_ I do not claim a right to a priority.
    - Regarding the amount of \$\_\_\_\_\_, I claim a right to a priority under Section 136 of the Act.
  - B. CLAIM OF LESSOR FOR DISCLAIMER OF A LEASE \$\_\_\_\_\_  
That I hereby make a claim under Subsection 65.2(4) of the Act, particulars of which are as follows: *(Attach full particulars of the claim, including calculations upon which the claim is based.)*
  - C. SECURED CLAIM of \$\_\_\_\_\_  
That in respect of this debt, I hold assets of the debtor valued at \$\_\_\_\_\_ as security, particulars of which are as follows: *(Attach full particulars of the security, including the date on which the security was given and the value at which you assess the security and attach a copy of the security document.)*
  - D. CLAIM BY FARMER, FISHERMAN or AQUACULTURIST of \$\_\_\_\_\_  
That I hereby make a claim under Subsection 81.2(1) of the Act for the unpaid amount of \$\_\_\_\_\_ *(Attach a copy of the sales agreement and delivery receipts.)*
  - E. CLAIM BY WAGE EARNER OF \$\_\_\_\_\_
    - That I hereby make a claim under subsection 81.3(8) of the Act in the amount of \$\_\_\_\_\_
    - That I hereby make a claim under subsection 81.4(8) of the Act in the amount of \$\_\_\_\_\_*(Give full particulars of the claim, including the calculations upon which the claim is based.)*
5. That, to the best of my knowledge, I am (or the above-named creditor is) (or am not or is not) related to the debtor within the meaning of section 4 of the Act, and have (or has) (or have not or has not) dealt with the debtor in a non-arm's-length manner.

6. That the following are the payments that I have received from, and the credits that I have allowed to, and the transfers at undervalue within the meaning of subsection 2(1) of the Act that I have been privy to or a party to with the debtor within the three months (or, if the creditor and the debtor are related within the meaning of section 4 of the Act or were not dealing with each other at arm's length, within the 12 months) immediately before the date of the initial bankruptcy event within the meaning of Section 2(1) of the Act: *(Provide details of payment, credits and transfers at undervalue.)*

Dated at \_\_\_\_\_, this \_\_\_\_ day of \_\_\_\_\_, 2024.

(CITY & PROVINCE)

\_\_\_\_\_  
(SIGNATURE OF INDIVIDUAL COMPLETING THIS FORM)

\_\_\_\_\_  
(SIGNATURE OF WITNESS)

\_\_\_\_\_  
(CREDITOR'S PHONE NUMBER)

\_\_\_\_\_  
(CREDITOR'S FACSIMILE NUMBER)

\_\_\_\_\_  
(CREDITOR'S E-MAIL ADDRESS)

**NOTE:** *If an affidavit is attached, it must have been made before a person qualified to take affidavits or solemn declarations.*

**WARNINGS:** *A Trustee may, pursuant to Subsection 128(3) of the Act, redeem a security on payment to the secured creditor of the debt or the value of the security as assessed in a proof of security by the secured creditor.*

**Subsection 201(1) of the Act provides severe penalties for making any false claim, proof, declaration or statement of account.**

*Must be signed and witnessed*

**SCHEDULE "B"**

**IN THE MATTER OF THE RECEIVERSHIP OF  
ROYAL OAKS GOLF CLUB INC.  
OF THE CITY OF MONCTON  
IN THE PROVINCE OF NEW BRUNSWICK**

**NOTICE OF REVISION OR DISALLOWANCE**

**Claim Reference No.:** \_\_\_\_\_

**To:** \_\_\_\_\_  
(Name of Creditor)

Defined terms not defined in this Notice of Revision or Disallowance shall have the meaning ascribed in the Claims Process Order, dated December 17, 2024.

Pursuant to the Claims Process Order, Deloitte Restructuring Inc., in its capacity as Receiver, hereby gives you notice that it has reviewed your Creditor Proof of Claim and has revised or disallowed your Creditor Claim. Subject to further dispute by you in accordance with the Claims Process Order, your Creditor Claim will be allowed as follows:

Creditor Proof of Claim	Creditor Claim Allowed
-------------------------	------------------------

Claim Amount (\$) \_\_\_\_\_

**REASON(S) OF DISALLOWANCE:**

---

---

---

---

---

---

---

---

If you intend to dispute the Creditor Notice of Revision or Disallowance, you must within 14 days of the date of receipt of the Creditor Notice of Revision or Disallowance deliver to the Receiver this Creditor Dispute Notice either by courier, facsimile or electronic mail to the address noted below. Creditor Dispute Notices shall be deemed to be received upon actual receipt thereof by the Receiver during normal business hours on a Business Day, or, if delivered outside of normal business hours, on the next Business Day.

Deloitte Restructuring Inc.  
Attn: Ian Lewis  
1741 Lower Water Street, Suite 800  
Halifax, NS B3J 0J2  
Phone: 902-422-8541  
Email: [royaloaks@deloitte.ca](mailto:royaloaks@deloitte.ca)

**IF YOU FAIL TO FILE YOUR CREDITOR DISPUTE NOTICE WITHIN 14 DAYS OF THE DATE YOU RECEIVED (OR ARE DEEMED TO HAVE RECEIVED) THIS CREDITOR NOTICE OF REVISION OR DISALLOWANCE, THE VALUE OF YOUR CREDITOR CLAIM WILL BE DEEMED TO BE ACCEPTED AS FINAL AND BINDING AS SET OUT IN THIS CREDITOR NOTICE OF REVISION OR DISALLOWANCE.**

**DATED** at \_\_\_\_\_, this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

**DELOITTE RESTRUCTURING INC.,**

solely in its capacity as Court-appointed Receiver  
and Manager of Royal Oaks Golf Club Inc.  
and not in its personal or corporate capacity

Per:

---

James Foran, CPA, CA, CIRP, LIT  
Senior Vice President

**SCHEDULE "C"**

**IN THE MATTER OF THE RECEIVERSHIP OF  
ROYAL OAKS GOLF CLUB INC.  
OF THE CITY OF MONCTON  
IN THE PROVINCE OF NEW BRUNSWICK**

**NOTICE OF DISPUTE**

**Claim Reference No.:** \_\_\_\_\_

Defined terms not defined in this Notice of Revision or Disallowance shall have the meaning ascribed in the Claims Process Order, dated December 17, 2024.

**Particulars of Creditor:**

Full legal name of Creditor: \_\_\_\_\_

Full mailing address of Creditor:

\_\_\_\_\_  
\_\_\_\_\_

**Other contact information of Creditor:**

Tel: \_\_\_\_\_

Email: \_\_\_\_\_

Fax: \_\_\_\_\_

Attention: \_\_\_\_\_  
(Name of Contact person)

**Dispute of Creditor Notice of Revision or Disallowance:**

The Creditor hereby disagrees with the value of its Creditor Claim as set out in the Notice of Revision or Disallowance and asserts a Creditor Claim as follows:

Creditor Claim Amount Allowed by Receiver	Creditor Claim Claimed by Creditor
--	---------------------------------------

Creditor Claim (\$) \_\_\_\_\_

**REASON(S) FOR DISPUTE:**

*(You must include a list of reasons as to why you are disputing your Creditor Claim as set out in the Notice of Revision or disallowance.)*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



---

---

---

---

---

---

---

---

---

---

**SERVICE OF CREDITOR DISPUTE NOTICE:**

If you intend to dispute the Creditor Notice of Revision or Disallowance, you must **within 14 days of the date of receipt of the Notice of Revision or Disallowance** deliver to the Receiver this Dispute Notice either by courier, facsimile or electronic mail to the address noted below. Dispute Notices shall be deemed to be received upon actual receipt thereof by the Receiver during normal business hours on a Business Day, or, if delivered outside of normal business hours, on the next Business Day.

Deloitte Restructuring Inc.  
Attn: Ian Lewis  
1741 Lower Water Street, Suite 800  
Halifax, NS B3J 0J2  
Phone: 902-422-8541  
Email: [royaloaks@deloitte.ca](mailto:royaloaks@deloitte.ca)

**IF YOU FAIL TO FILE YOUR DISPUTE NOTICE WITHIN 14 DAYS OF THE DATE YOU RECEIVED (OR ARE DEEMED TO HAVE RECEIVED) THE NOTICE OF REVISION OR DISALLOWANCE, THE VALUE OF YOUR CREDITOR CLAIM WILL BE DEEMED TO BE ACCEPTED AS FINAL AND BINDING AS SET OUT IN THE CREDITOR NOTICE OF REVISION OR DISALLOWANCE.**

**DATED** at \_\_\_\_\_, this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
Witness

\_\_\_\_\_  
(Name of Creditor)

Per: \_\_\_\_\_  
Name: \_\_\_\_\_  
Title: \_\_\_\_\_

*Must be signed and witnessed*