

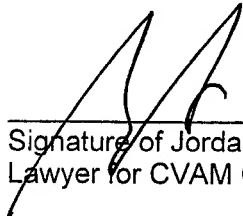


- (b) deliver all Property (excluding Property subject to liens the validity of which is dependent on maintaining possession) to the Liquidator;
- (c) advise the Liquidator of the existence of any books, documents, securities, contracts, orders, corporate and accounting records, and any other papers, records and information of any kind related to the business or affairs of VWMC, and any computer programs, computer tapes, computer disks, or other data storage media containing any such information (collectively, the "**Records**") in that Person's possession or control;
- (d) provide to the Liquidator or permit the Liquidator to make, retain and take away copies of the Records and grant to the Liquidator unfettered access to and use of accounting, computer, software and physical facilities, provided however that nothing in this Order shall require the delivery of Records, or the granting of access to Records, which may not be disclosed or provided to the Liquidator due to solicitor client privilege or statutory provisions prohibiting such disclosure;
- (e) provide all details and records in support of their respective financial contributions to, and claims against, VWMC and a summary of any amounts claimed to be owing; and
- (f) co-operate with the Liquidator in carrying out its duties including, without limitation, answer all enquires of the Liquidator that relate in any way to VWMC or its business, assets or liabilities.

2. If any Records are stored or otherwise contained on a computer or other electronic system of information storage, whether by an independent service provider or otherwise, all Persons in possession or control of such Records shall forthwith give unfettered access to the Liquidator for the purpose of allowing the Liquidator to recover and fully copy all of the information contained therein whether by way of printing the information or making copies of computer disks or such other manner of retrieving and copying the information as the Liquidator in its discretion deems expedient, and shall not alter, erase or destroy any Records without the prior written consent of the Liquidator. Further, for the purposes of this paragraph, all Persons shall provide the Liquidator with all such assistance in gaining immediate access to the information in the Records as the Liquidator may require including, without limitation, providing the Liquidator with instructions on the use of any computer or other system and providing the Liquidator with any and all access codes, account names and account numbers that may be required to gain access to the information.

3. The Liquidator may from time to time apply to this Court for further advice and directions in the discharge of its powers and duties.

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 Jordan Schultz  
Lawyer for CVAM Canada Strategy Limited

By the Court.

\_\_\_\_\_  
Registrar

