



Court File No. CV-25-00735482-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

THE HONOURABLE MR.

)

MONDAY, THE 3RD

JUSTICE PENNY

)

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DAY OF MARCH, 2025

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c.C-36 AS AMENDED

B E T W E E N:

THE VANCOR GROUP INC.

Applicant

- and -

2744364 ONTARIO LIMITED o/a TRUE NORTH CANNABIS CO.,
2668905 ONTARIO INC. o/a BAMBOO BLAZE, AND 2767888 ONTARIO
INC.

Respondents (Debtors)

CLAIMS PROCEDURE ORDER

THIS MOTION, made by the applicant, The Vancor Group Inc. ("**Vancor**"), pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "**CCAA**") for an order establishing a claims procedure to identify and quantify Claims (defined below), was heard this day via Zoom videoconference.

ON READING the affidavit of Cory Van Iersel sworn February 24, 2025 and the Exhibits thereto and the third report to the court of Deloitte Restructuring Inc., in its capacity as CCAA monitor ("**Monitor**") of the 2744364 Ontario Limited, 2668905 Ontario Inc., and 2767888 Ontario Inc. ("**Debtors**") dated February 27, 2025, and on hearing the submissions of counsel for Vancor, counsel for the Debtors, counsel for the Monitor, and such other parties listed on the participant information form, with no one else appearing for any other party although duly served as appears from the affidavit of service of Mryam Sarkis affirmed on February 24, 2025, filed,

SERVICE

1. **THIS COURT ORDERS** that the time for service of the notice of motion and the motion record is hereby validated so that this motion is properly returnable today and hereby dispenses with further service thereof.

DEFINITIONS AND INTERPRETATION

2. **THIS COURT ORDERS** that unless otherwise stated, all monetary amounts referenced herein are expressed in Canadian dollars.

3. **THIS COURT ORDERS** that for the purposes of this Order the following terms shall have the following meanings:

- (a) **“BIA”** means the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended.
- (b) **“Business Day”** means a day, other than a Saturday or a Sunday, on which banks are generally open for business in Toronto, Ontario.
- (c) **“Books and Records”** means the books and records of the Debtors related to the operations of the business of the Debtors, including employee records, account ledgers, transaction records, payment records, and other similar information, either in physical or electronic form.
- (d) **“CCAA”** has the meaning ascribed to it in the preamble to this Claims Procedure Order.
- (e) **“Charges”** shall have the meaning ascribed to it in the Initial Order.
- (f) **“Claim”** means each of:
 - (i) any right or claim of any Person against the Debtors (or any one of them), in connection with any indebtedness, liability or obligation of any kind whatsoever and any interest accrued thereon or costs payable in respect thereof, whether liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, unsecured,

present, future, known or unknown, by guarantee, surety or otherwise and whether or not such right is executory in nature, including, by reason of any breach of contract (whether oral or written), any breach of duty (including, any legal, statutory, equitable or fiduciary duty), any right of ownership of or title to property, contracts or assets or right to a trust or deemed trust (whether statutory, express, implied, resulting, constructive or otherwise), the right or ability of any Person to advance a claim for contribution or indemnity (including any claim by a Director or Officer against the Debtors for contribution and/or indemnity arising from any D&O Claim (as defined below)) for or otherwise with respect to any matter, action, cause or chose in action, whether existing at present or commenced in the future, which indebtedness, liability or obligation (A) is based in whole or in part on facts existing prior to the Filing Date, (B) relates to a time period prior to the Filing Date, or (C) would have been a claim provable in bankruptcy had the Debtors become bankrupt on the Filing Date (each, a “**Pre-Filing Claim**”, and collectively, the “**Pre-Filing Claims**”);

- (ii) any indebtedness, liability or obligation of any kind with respect to the Debtors arising out of the restructuring, termination, repudiation or disclaimer of any lease, contract, or other agreement or obligation on or after the Filing Date, and whether such restructuring, termination, repudiation or disclaimer took place or takes place before or after the date of this Claims Procedure Order (each, a “**Restructuring Claim**”, and collectively, the “**Restructuring Claims**”); or
- (iii) any right or claim of any Person against any of the Directors or Officers of any of the Debtors, in connection with any indebtedness, liability or obligation of any kind whatsoever and any interest accrued thereon or costs payable in respect thereof, whether liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, unsecured, present, future, known or unknown, by guarantee, surety or otherwise, and whether or not such right is executory in nature

including any right or ability of any Person to advance a claim for contribution, indemnity or otherwise against any of the Directors or Officers of the Debtors with respect to any matter, action, cause or chose in action, however arising, for which any Director or Officer of the Debtors is alleged to be, by statute or otherwise by law or equity, liable to pay in his or her capacity as a Director or Officer of the Debtors (each, a “**D&O Claim**”, and collectively, the “**D&O Claims**”); or

(iv) a D&O Indemnity Claim (as defined below),

provided however, that “**Claim**” shall not include an Excluded Claim.

- (g) “**Claims Bar Date**” means 5:00 p.m. (prevailing Eastern Time) on April 7, 2025 for Pre-Filing Claims and D&O Claims.
- (h) “**Claims Procedure**” means the Claims Procedure set out in the Claims Procedure Order.
- (i) “**Claims Procedure Order**” means this Claims Procedure Order.
- (j) “**Court**” means the Ontario Superior Court of Justice (Commercial List).
- (k) “**Creditor**” means any Person with a Claim against the Debtors or any one of them and includes Litigation Claimants.
- (l) “**Creditor over \$10k**” means any Person with a Claim against the Debtors or any one of them in an amount greater than \$10,000.
- (m) “**Creditor under \$10k**” means any Known Creditor of any of the Debtors who is owed an amount equal to or less than \$10,000 according to the Books and Records of the Debtors.
- (n) “**Creditors under \$10k List**” has the meaning ascribed to that term in paragraph 14 of this Claims Procedure Order.
- (o) “**CRO**” means Mr. Shawn Dym, in his capacity as Court-appointed Chief

Restructuring Officer of the Debtors.

- (p) **“Directors and Officers”** means anyone who is or was, or may be deemed to be or have been, whether by statute, operation of law or otherwise, a director or officer or *de facto* director or officer of any of the Debtors.
- (q) **“D&O Claim”** has the meaning ascribed to that term in paragraph 3(f)(iii) of this Claims Procedure Order.
- (r) **“D&O Indemnity Claim”** means any existing or future right of any Director or Officer against one or more of the Debtors which arose or arises as a result of any Person filing a Proof of Claim (as defined below) in respect of such Director or Officer for which such Director or Officer is entitled to be indemnified by one or more of the Debtors.
- (s) **“Excluded Claim”** means the following Claims against the Debtors (or any one of them) or any Directors and Officers, whether liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, unsecured, present, future, known or unknown, including any interest accrued thereon or costs incurred in respect thereof:
 - (i) any Claim of any Secured Creditor in respect of its Secured Debt; or
 - (ii) any Claim entitled to the benefit of an existing or future Court-ordered priority charge ordered by the Court, including the Charges.
- (t) **“Filing Date”** means January 24, 2025.
- (u) **“Initial Order”** means the Amended and Restated Initial Order dated February 3, 2025, (as may be further supplemented, amended or varied from time to time).
- (v) **“Instruction Letter”** means the guide to this Claims Procedure, in substantially the form attached as Schedule “B” hereto.
- (w) **“Known Creditors”** means:

- (i) any Person, which, to the knowledge of the Debtors and the Monitor, was owed monies by the Debtors as of the Filing Date and which monies remain unpaid in whole or in part; and
 - (ii) any Person who, to the knowledge of the Debtors and the Monitor, commenced a legal or any other proceeding against the Debtors, which legal proceeding was commenced and served upon the Debtors prior to the Filing Date.
- (x) **“Litigation”** means:
- Garas Family Holdings Inc. (Applicant) and Corry Van Iersel, Kenneth Schaller, PICI Investments Incorporated, The Vancor Group Inc., and 2767888 Ontario Inc. (Respondents) (Court File No. CV-24-00001414-0000); and*
- Vancor Group Inc., Vangar Properties Inc., Cornelius Van Iersel, Corry Van Iersel, and Rebecca MacDonald (Plaintiffs) and 2744364 Ontario Limited (o/a. as True North Cannabis Co., 2767888 Ontario Inc., 2767889 Ontario Inc., 1000370759 Ontario Inc., 2668905 Ontario Inc (o/a Bamboo Blaze), Kenneth Schaller (also known as Ken Schaller), Dustin Lindhorst, Alena Hapanovich, Galaxie Brands Corporation, Vancor Management Inc., Jax Jungle Play Inc., and Garas Family Holdings Inc. (Defendants and Plaintiffs by Counterclaim) (Court File No. CV-24-00000669-0000).*
- (y) **“Litigation Claims”** means the Litigation and all Pre-Filing Claims which are raised in, or could have been raised in the Litigation (in fresh proceedings before any court of competent jurisdiction) as of the Filing Date.
- (z) **“Litigation Claimant”** means any Person asserting claim in the Litigation, whether by direct claim, counterclaim, or cross-claim. For certainty, a Litigation Claimant is a Creditor for the purposes of this Claims Procedure Order.
- (aa) **“Notice to Creditors”** means the Notice to Creditors for publication in substantially the form attached as Schedule “A” hereto.

- (bb) **“Notice of Dispute of Revision or Disallowance”** means the notice, substantially in the form attached as Schedule “E” hereto, which may be delivered to the Monitor by a Creditor disputing a Notice of Revision or Disallowance received by such Creditor.
- (cc) **“Notice of Revision or Disallowance”** means the notice, substantially in the form attached as Schedule “D” hereto, which may be prepared by the Debtors, in consultation with the Monitor, and delivered by the Monitor to a Creditor revising or disallowing, in part or in whole, a Claim submitted by such Creditor in a Proof of Claim.
- (dd) **“Person”** is to be interpreted broadly and includes any individual, firm, general or limited partnership, joint venture, trust, corporation, limited or unlimited liability company, unincorporated organization, association, trust, collective bargaining agent, joint venture, federal or provincial government body, agency or ministry, regulatory body, officer or instrumentality thereof, or any juridical entity, wherever situate or domiciled, and whether or not having legal status, howsoever designated or constituted, and whether acting on their own or in a representative capacity.
- (ee) **“Pre-Filing Claim”** has the meaning ascribed to that term in paragraph 3(f)(i) of this Claims Procedure Order.
- (ff) **“Proof of Claim”** means the proof of claim to be completed and filed with the Monitor by a Person setting forth a Claim and which shall include all supporting documentation in respect of such Claim, substantially in the form attached hereto as Schedule “C”.
- (gg) **“Proof of Claim Document Package”** means a document package that includes a copy of the Notice to Creditors, Instruction Letter and Proof of Claim, and such other materials as the Monitor may consider appropriate or desirable.
- (hh) **“Restructuring Claim”** has the meaning ascribed to that term in paragraph 3(f)(ii) of this Claims Procedure Order.

- (ii) **“Restructuring Claims Bar Date”** means, in respect of each Restructuring Claim and each Person having a Restructuring Claim, 5:00 p.m. (prevailing Eastern Time) on the *later of*: (i) the Claims Bar Date; and (ii) the date that is 15 days after the date on which the Monitor sends a Proof of Claim Document Package to the Creditor with respect to a Restructuring Claim that arose after the Filing Date.
- (jj) **“Secured Creditor”** means each of: (i) Bank of Montreal (**“BMO”**); (ii) Firm Capital Mortgage Fund Inc. (**“Firm Capital”**); (iii) M. Higgins & Associates Inc. (**“Higgins”**); (iv) Metal Tree Inc. (**“Metal Tree”**); (v) Garas Family Holdings Inc., Manal Garas Pharmacy Corporation, and Nashaat Garas (collectively, **“Garas”**); (vi) Seavale Incorporated (**“Seavale”**); (vii) Venizelos Anastasiadis (**“Anastasiadis”**); and (viii) 818876 Ontario Inc. (**“8188”**).

- (kk) **“Secured Debt”** means:

in respect of Anastasiadis: the aggregate outstanding indebtedness owing by 888 to Anastasiadis under the mortgage registered as Instrument No. PC211268 on PIN 53099-0015;

in respect of BMO: the aggregate outstanding indebtedness owing by 888 to BMO under the mortgage registered as Instrument No. WR1304183 on PIN 03816-0033;

in respect of Firm Capital: the aggregate outstanding indebtedness owing by 888, as borrower, and TNCC, as guarantor, to Firm Capital, as assignee of Firm Capital Corporation, as lender, under the mortgage commitment agreement dated March 16, 2022, as amended;

in respect of Garas: aggregate outstanding indebtedness owing by 888 to Garas under the mortgage commitment agreement dated November 5, 2020, as amended;

in respect of Higgins: the aggregate outstanding indebtedness owing by 888 to Higgins under the mortgage registered as Instrument No. ND212965 on PIN 51194-0843;

in respect of Metal Tree: the aggregate outstanding indebtedness owing by 888 to

Metal Tree Inc. under the mortgage registered as Instrument No. GB155923 on PIN 52109-0169;

in respect of Seavale: the aggregate outstanding indebtedness owing by 888 to Seavale Incorporated under the mortgage registered as Instrument No. BS195468 on PIN 49157-0021; and

in respect of 8188: the aggregate outstanding indebtedness owing by 888 to 8188 under the mortgage registered as Instrument No. OC2342254 on PIN 04036-0124.

(ll) “**Status**” means, with respect to a Claim, whether such claim is an unsecured Claim, Secured Claim, or Equity Claim.

(mm) “**Website**” means the Monitor’s website at

<https://www.insolvencies.deloitte.ca/tbcc>.

4. **THIS COURT ORDERS** that all references as to time herein shall mean local time in Toronto, Ontario, Canada, and any reference to an event occurring on a Business Day shall mean prior to 5:00 p.m. on such Business Day, unless otherwise indicated herein.

5. **THIS COURT ORDERS** that all references to the word “including” shall mean “including without limitation”.

6. **THIS COURT ORDERS** that all references to the singular herein include the plural, the plural include the singular, and any gender includes all genders.

MONITOR’S ROLE

7. **THIS COURT ORDERS** that the Monitor, in addition to its prescribed rights, duties, responsibilities and obligations under the CCAA and under the Initial Order, is hereby directed and empowered to take all such other actions and fulfill such other roles as are authorized by this Claims Procedure Order or are incidental thereto, and that in taking such other actions and in fulfilling such other roles, the Monitor shall have the protections given to it in the Initial Order

and this Claims Procedure Order, including the protections provided in paragraph 45 of this Claims Procedure Order.

NOTICE TO CREDITORS

8. **THIS COURT ORDERS** that the Debtors shall provide to the Monitor a complete list of Known Creditors as at the date of this Claims Procedure Order, showing for each Known Creditor, their name, address and amount owed pursuant to the Debtors' books and records. For those Known Creditors whose Claims are not liquidated, the Debtors shall provide a value of \$1.

9. **THIS COURT ORDERS** that the Monitor shall send the Proof of Claim Document Package by ordinary mail or email to the last known mailing address or email address of each Known Creditor within five (5) Business Days following the issuance of the Claims Procedure Order.

10. **THIS COURT ORDERS** that with respect to Restructuring Claims arising after the date of this Claims Procedure Order, the Monitor shall, no later than five (5) Business Days following the effective date of the termination, repudiation or disclaimer of a lease, contract or other agreement or obligation, send to the counterparty(ies) of such agreement or obligation a Proof of Claim Document Package by email or regular mail if the email address is not known.

11. **THIS COURT ORDERS** that as soon as practicable, the Monitor shall cause the Notice to Creditors to be published, for at least one (1) Business Day, in the Globe and Mail (National Edition).

12. **THIS COURT ORDERS** that the Monitor shall cause the Notice to Creditors, the Proof of Claim Document Package and the Claims Procedure Order to be posted to the Website as soon as reasonably possible and cause it to remain posted thereon until its discharge as Monitor of the Debtors.

13. **THIS COURT ORDERS** that to the extent that any Person requests documents relating to the Claims Procedure prior to the Claims Bar Date or the Restructuring Claims Bar Date, as applicable, the Monitor shall forthwith cause a Proof of Claim Document

Package to be sent to such Person by email or direct the Person to the documents posted on the Website, and otherwise respond to any request relating to the Claims Procedure as may be appropriate in the circumstances.

CLAIMS PROCEDURE FOR CREDITORS UNDER \$10K

14. **THIS COURT ORDERS** that by no later than five (5) Business Days following the issuance of the Claims Procedure Order, the Monitor shall post a listing of the Known Creditors under \$10k and their Claims on the Website, which listing will identify the name of such Creditors and the amounts owing to such Creditors according to the Books and Records of the Debtors (the “**Creditors under \$10k List**”). The Creditors under \$10k List will be compiled by the Monitor in consultation with the Debtors.

15. **THIS COURT ORDERS** that by no later than five (5) Business Days following the issuance of the Claims Procedure Order, where the Debtors have an email address in their Books and Records for any Creditor under \$10k, the Monitor shall send an email to each such Creditor, at the email address as recorded in the Debtors’ Books and Records, directing such Creditors under \$10k to the Website and enclosing the Instruction Letter. Where the Books and Records do not disclose an email address but do disclose an address for a Creditor under \$10k, the Monitor shall mail the Instruction Letter by regular mail to that address.

16. **THIS COURT ORDERS** that the posting and publishing of the Notice to Creditors as set out in paragraph 11 of this Claims Procedure Order, the posting of the Creditors under \$10k List as set out in paragraph 14 of this Claim Process Order, and sending the emails or regular mail letters as described in paragraph 15 of this Claims Procedure Order will be sufficient notice to the Creditors under \$10k of this Claims Procedure Order and of their Creditor under \$10k Claims or Claims, as applicable.

17. **THIS COURT ORDERS** that any Creditor under \$10k that agrees with the amount of their Claim as set out on the Creditors under \$10k List shall not be required to take any further steps in respect of their Claim, including filing a Proof of Claim, and shall be deemed to have accepted their Claim as set out in the Creditors under \$10k List, and each such Claim will be deemed to be a Proven Claim.

18. **THIS COURT ORDERS** that any Creditor under \$10k that disputes the amount of their Claim as set out in the Creditors under \$10k List and/or wishes to assert (i) a D&O Claim or (ii) a Restructuring Claim, must submit a Proof of Claim with the Monitor in the manner set out in paragraph 21 hereof so that the Proof of Claim is received by the Monitor no later than the Claims Bar Date. Failure to file a Proof of Claim with the Monitor by the Claims Bar Date and/or the Restructuring Claims Bar Date, as applicable, will result in such Creditor under \$10k Claim being allowed for the amount set forth in the Creditors under \$10k List or, if they are not listed in the Creditors under \$10k List, being forever barred and extinguished, in which case such Creditor under \$10k will be forever prohibited from making or enforcing a Claim, D&O Claim, and/or Restructuring Claim.

CLAIMS BAR DATES

19. **THIS COURT ORDERS** that all Proofs of Claim with respect to: (a) Pre-Filing Claims, shall be filed with the Monitor on or before the Claims Bar Date; (b) Restructuring Claims, shall be filed with the Monitor on or before the Restructuring Claims Bar Date; and, (c) D&O Claims, shall be filed with the Monitor on or before the Claims Bar Date, except to the extent that the D&O Claim relates to a Restructuring Claim, in which case such D&O Claim shall be filed with the Monitor on or before the applicable Restructuring Claims Bar Date.

20. **THIS COURT ORDERS** that, subject to any Claims deemed to be Proven Claims pursuant to paragraph 31 of this Claims Procedure Order, any Creditor that does not file a Proof of Claim as provided for herein such that such Proof of Claim is received by the Monitor on or before the applicable Claims Bar Date or Restructuring Claims Bar Date: (a) shall be, and is hereby forever barred from making or enforcing such Claim against the Debtors or the Directors or Officers, or any of them; and (b) shall not be entitled to any further notice thereof, and shall not be entitled to participate as a Creditor in these proceedings.

PROOFS OF CLAIM

21. **THIS COURT ORDERS** that each Creditor over \$10k, including Litigation Claimants, shall file a Proof of Claim against the Debtors and shall include any and all Claims it asserts against any of the Debtors in a single Proof of Claim. A Creditor under \$10k shall only be

required to file a Proof of Claim in accordance with paragraph 18 of this Claims Procedure Order if it disputes the amount of its Claim set out in the Creditors under \$10k List.

22. **THIS COURT ORDERS** that if a Creditor over \$10k is asserting a Claim against any of the Debtors and against the Directors or Officers of any of the Debtors, all such Claims shall be included in the same Proof of Claim.

23. **THIS COURT ORDERS** that where a Claim against the Debtors is based on the Debtors' guarantee of the repayment of a debt of any other Person, the Proof of Claim in respect of such Claim shall clearly state that it is based on such a guarantee.

24. **THIS COURT ORDERS** that if any Claim arose in a currency other than Canadian dollars, then the Creditor making the Claim shall complete its Proof of Claim indicating the amount of the Claim in such currency. The Monitor shall subsequently convert any Claim filed in a foreign currency to Canadian dollars at the Bank of Canada exchange rate on the Filing Date.

25. **THIS COURT ORDERS** that the Monitor shall supervise the receipt and collection of the Proofs of Claim and, in conjunction with the Debtors (and any Director and/or Officer against whom a D&O Claim is asserted), shall, subject to further order of the Court, review each Proof of Claim submitted by the Claims Bar Date or the Restructuring Claims Bar Date, as applicable. The Monitor shall, upon request, provide the Debtors' counsel with copies of all Proofs of Claim and any other documents delivered to the Monitor pursuant to the Claims Procedure.

NOTICE SUFFICIENT

26. **THIS COURT ORDERS** that each of the:

- (a) Notice to Creditors attached as Schedule "A";
- (b) Instruction Letter attached as Schedule "B";
- (c) Proof of Claim form attached as Schedule "C";

(d) Notice of Revision or Disallowance attached as Schedule “D”; and

(e) Notice of Dispute of Revision or Disallowance attached as Schedule “E,”

are hereby approved in substantially the forms attached. Despite the foregoing, the Monitor may, from time to time, and with the consent of the Debtors, make minor changes to such forms as the Monitor considers necessary or desirable.

27. **THIS COURT ORDERS** that publication of the Notice to Creditors on the Website and in the Globe and Mail (National Edition), posting of the Proof of Claim Document Package on the Website, the sending of the Proof of Claim Document Package to the Creditors over \$10k in accordance with this Claims Procedure Order, and completion of the other requirements of this Claims Procedure Order shall constitute good and sufficient service and delivery of notice of a Creditor’s Claim, this Claims Procedure Order, the Claims Procedure, the Claims Bar Date, and the Restructuring Claims Bar Date on all Persons who may be entitled to receive notice, and no other notice or service need be given or made and no other document or material need be sent to or served upon any Person in respect of this Claims Procedure Order or the Claims Procedure.

28. **THIS COURT ORDERS** that the Monitor, in consultation with the Debtors and the applicable Director or Officer in respect of any D&O Claim, is hereby authorized to use its reasonable discretion as to the adequacy of compliance with respect to the manner and timing in which forms delivered hereunder are completed and executed, and may, where it is satisfied that a Claim has been adequately proven, waive strict compliance with the requirements of this Claims Procedure Order as to completion and execution of such forms. Notwithstanding any other provision of this Claims Procedure Order, any Claim filed with the Monitor after the applicable Claims Bar Date or Restructuring Claims Bar Date may, in the reasonable discretion of the Monitor or subject to further Order of the Court, be deemed to have been filed on or before the applicable Claims Bar Date or Restructuring Claims Bar Date, and, subject to further Order of this Court, may be reviewed by the Monitor.

D&O INDEMNITY CLAIM

29. **THIS COURT ORDERS** that to the extent any D&O Claim is filed in accordance with this Claims Procedure Order, a corresponding D&O Indemnity Claim shall be automatically and immediately deemed to have been filed in respect of such D&O Claim.

ADJUDICATION AND RESOLUTION PROCESS FOR CLAIMS

30. **THIS COURT ORDERS** that the Monitor, in consultation with the Debtors (and in the case of a D&O Claim, in consultation with the applicable Director and/or Officer) shall review all Proofs of Claim filed in accordance with this Claims Procedure Order and at any time may (a) request additional information from a Creditor; (b) request that a Creditor file a revised Proof of Claim; (c) attempt to resolve and settle any issue arising in a Proof of Claim or in respect of a Claim; (d) accept (in whole or in part) the amount and/or Status of any Claim and so notify the Creditor in writing; and (e) revise or disallow (in whole or in part) the amount and/or Status of any Claim and so notify the Creditor in writing.

31. **THIS COURT ORDERS** that where a Claim has been accepted by the Monitor in accordance with this Claims Procedure Order, such Claim shall constitute such Creditor's "**Proven Claim**". The acceptance of any Claim or other determination of same in accordance with this Claims Procedure Order, in full or in part, shall not constitute an admission of any fact, thing, liability, or quantum or Status of any claim by any Person, save and except in the context of this CCAA proceedings and, in respect of Litigation Claims, the Litigation.

32. **THIS COURT ORDERS** that where a Claim is revised or disallowed (in whole or in part, and whether as to amount and/or Status), the Monitor shall deliver to the Creditor a Notice of Revision or Disallowance, attaching the form of Notice of Dispute to such Revision or Disallowance.

33. **THIS COURT ORDERS** that any Person who intends to dispute a Notice of Revision or Disallowance sent pursuant to paragraph 32 hereof shall deliver a Notice of Dispute of Revision or Disallowance to the Monitor, by 5:00 p.m. (Eastern Time) on the day that is not later than fourteen (14) days after the Business Day on which the Notice of Revision or Disallowance was sent, or such longer period as may be agreed to by the Monitor in writing.

The receipt of a Notice of Dispute of Revision or Disallowance by the Monitor within the fourteen (14) day period specific in this paragraph shall constitute an application to have the amount and/or Status of such claim determined pursuant to the Claims Procedure as provided in this Claims Procedure Order.

34. **THIS COURT ORDERS** that if any Person who received a Notice of Revision or Disallowance does not return a Notice of Dispute of Revision or Disallowance in accordance with paragraph 33 of this Claims Procedure Order, the value and Status of such Claim shall be deemed to be set out in the Notice of Revision or Disallowance for voting and distribution purposes, and the Creditor will be barred from disputing or appealing same, and the balance of such Creditor's Claim, if any, shall be forever barred and extinguished.

35. **THIS COURT ORDERS** that as soon as practicable after a Notice of Dispute of Revision or Disallowance is received by the Monitor in accordance with this Claims Procedure Order, the Monitor, in consultation with the Debtors, may attempt to resolve and settle the Claim with the Creditor.

36. **THIS COURT ORDERS** that in the event that a dispute raised in a Notice of Dispute of Revision or Disallowance is not settled within a reasonable time period or in a manner satisfactory to the Monitor, the Monitor may refer the dispute to a claims officer ("**Claims Officer**") for determination. The Claims Officer shall be chosen by the Monitor in its sole direction, subject to the following qualifications: the Claims Officer shall be (i) a former judge of the Court (ii) a member of the Chartered Institute of Arbitrators holding either the FCI Arb or C.Arb designation.

37. **THIS COURT ORDERS** that the Debtors shall pay the reasonable professional fees and disbursements of the Claims Officer on presentation and acceptance of invoices from time to time. The Claims Officer shall be entitled to a reasonable retainer against his fees and disbursements, which shall be paid upon request by the Debtors with the consent of the Monitor.

38. **THIS COURT ORDERS** that, subject to further order of the Court, the Claims Officer shall determine the Status and/or amount of each Claim in respect of which a dispute has been referred to such Claims Officer and in doing so, the Claims Officer shall be empowered to

determine (a) all timetable and other procedural matters which may arise in respect of the determination of any Claim; (b) the process by which evidence will be brought before them; (c) interlocutory motions, if any; and (d) costs, if any, between the parties of any hearing before the Claims Officer.

39. **THIS COURT ORDERS** that if a Litigation Claim is referred to the Claims Officer, the relevant parties are directed to consult with the Claims Officer, forthwith after the Litigation Claim is referred to the Claims Officer, for the purposes of establishing a litigation timetable.

40. **THIS COURT ORDERS** that the Monitor or the Creditor may appeal the Claims Officer's determination to this Court by serving upon the other and filing with this Court, within ten (10) calendar days of notification of the Claims Officer's determination of such Creditor's Claim, a notice of motion returnable on a date to be fixed by this Court. If a notice of motion is not filed within such period, then the Claims Officer's determination shall be deemed to be final and binding and shall be such Creditor's Proven Claim.

41. **THIS COURT ORDERS** that Vancor and Corry Van Iersel (and "related persons" to them, as that term is defined under the BIA) shall not participate in the Monitor's review and determination of Litigation Claims in accordance with paragraph 39 above, other than responding in writing to specific information requests made by the Monitor, if any.

NOTICE OF TRANSFEREES

42. **THIS COURT ORDERS** that neither the Debtors nor the Monitor shall be obligated to give notice to or to otherwise deal with a transferee or assignee of a Claim as the Creditor in respect thereof unless and until (a) actual written notice of transfer or assignment, together with satisfactory evidence of such transfer or assignment, shall have been received by the Monitor, and (b) the Monitor shall have acknowledged in writing such transfer or assignment, and thereafter such transferee or assignee shall, for the purposes hereof, constitute the "Creditor" in respect of such Claim. Any such transferee or assignee of a Claim, and such Claim, shall be bound by any notices given or steps taken in respect of such Claim in accordance with this Claims Procedure Order prior to the written acknowledgement by the Monitor of such transfer or assignment.

43. **THIS COURT ORDERS** that if the holder of a Claim has transferred or assigned the whole of such Claim to more than one Person or part of such Claim to another Person or Persons, such transfer or assignment shall not create a separate Claim or Claims and such Claim shall continue to constitute and be dealt with as a single Claim notwithstanding such transfer or assignment, and the Applicant and the Monitor shall in each such case not be bound to acknowledge or recognize any such transfer or assignment and shall be entitled to give notices to and to otherwise deal with such Claim only as a whole and then only to and with the Person last holding such Claim in whole as the Creditor in respect of such Claim. Provided that a transfer or assignment of the Claim has taken place in accordance with paragraph 42 of this Claims Procedure Order and the Monitor has acknowledged in writing such transfer or assignment, the Person last holding such Claim in whole as the Creditor in respect of such Claim may by notice in writing to the Monitor direct that subsequent dealings in respect of such Claim, but only as a whole, shall be with a specified Person and, in such event, such Creditor, such transferee or assignee of the Claim and the whole of such Claim shall be bound by any notices given or steps taken in respect of such Claim, by or with respect to such Person in accordance with this Claims Procedure Order.

44. **THIS COURT ORDERS** that the transferee or assignee of any Claim (a) shall take the Claim subject to the rights and obligations of the transferor/assignor of the Claim, and subject to the rights of the Debtors against any such transferor or assignor, including any rights of set-off which the Debtors had against such transferor or assignor, and (b) cannot use any transferred or assigned Claim to reduce any amount owing by the transferee or assignee to the Debtors, whether by way of set off, application, merger, consolidation or otherwise.

PROTECTIONS FOR MONITOR

45. **THIS COURT ORDERS** that: (a) in carrying out the terms of this Claims Procedure Order, the Monitor shall have all of the protections given to it by the CCAA and the Initial Order or as an officer of this Court, including the stay of proceedings in its favour, (b) the Monitor shall incur no liability or obligation as a result of the carrying out of the provisions of this Claims Procedure Order, (c) the Monitor shall be entitled to rely on the Books and Records of the Debtors and any information provided by the Debtors, all without independent investigation,

and (d) the Monitor shall not be liable for any claims or damages resulting from any errors or omissions in such books, records or information.

DIRECTIONS

46. **THIS COURT ORDERS** that the Debtors or the Monitor may, at any time, and with such notice as this Court may require, seek directions from the Court with respect to this Claims Procedure Order and the Claims Procedure set out herein, including the forms attached as Schedules hereto.

SERVICE AND NOTICE

47. **THIS COURT ORDERS** that the Monitor or the Debtors, as the case may be, are at liberty to deliver the Proof of Claim Document Package, and any letters, notices or other documents to Creditors or other interested Persons, by forwarding true copies thereof by prepaid ordinary mail, courier, personal delivery or electronic or digital transmission to such Persons at the address as last shown on the records of the Applicant and that any such service or notice by courier, personal delivery or electronic or digital transmission shall be deemed to be received on the next Business Day following the date of forwarding thereof, or if sent by prepaid ordinary mail, on the third Business Day after mailing.

48. **THIS COURT ORDERS** that any notice or other communication (including Proofs of Claim) to be given under this Claims Procedure Order by a Creditor to the Monitor shall be in writing in substantially the form, if any, provided for in this Claims Procedure Order and will be sufficiently given only if given by electronic or digital transmission, prepaid ordinary mail, courier, or personal delivery addressed to:

DELOITTE RESTRUCTURING INC.
Attention: In its capacity as Court Appointed
Monitor of 2744364 Ontario Limited, et al.
8 Adelaide Street West, Suite 200
Toronto, ON, M5H 0A9
Telephone: 1-855-643-3382
E-mail: truenorthcc@deloitte.ca

49. **THIS COURT ORDERS** that any such notice or other communication by a Creditor to

the Monitor shall be deemed received only upon actual receipt thereof, provided that any notice or communication by a Creditor to the Monitor that is received by the Monitor on a non-Business Day or after 5:00 p.m. (prevailing Eastern Time) shall be deemed to have been received on the next Business Day.

MISCELLANEOUS

50. **THIS COURT ORDERS** that notwithstanding any other provision of this Claims Procedure Order, the solicitation of Proofs of Claim, and the filing by a Person of any Proof of Claim, shall not, for that reason only, grant any Person any standing in the CCAA proceedings.

51. **THIS COURT ORDERS** that notwithstanding the terms of this Claims Procedure Order, and without limitation to paragraph 45 of this Claims Procedure Order, the Monitor may apply to this Court from time to time for directions from this Court with respect to this Claims Procedure Order, or for such further order or orders as any of them may consider necessary or desirable to amend, supplement or clarify the terms of this Claims Procedure Order.

52. **THIS COURT ORDERS** that nothing in this Order shall prejudice the rights and remedies of any Director or Officer under any existing Director and Officer insurance policy or prevent or bar any Person from seeking recourse against or payment from any Director's and/or Officer's liability insurance policy or policies that exist to protect or indemnify the Directors and/or Officers, whether such recourse or payment is sought directly by the Person asserting a Claim from the insurer or derivatively through the Director or Officer or one or more of the Debtors; provided, however, that nothing in this Order shall create any rights in favour of such Person under any policies of insurance nor shall anything in this Order limit, remove, modify or alter any defence to such claim available to the insurer pursuant to the provisions of any insurance policy or at law.

53. **THIS COURT ORDERS** that this Claims Procedure Order shall have full force and effect in all provinces and territories in Canada, outside Canada and against all Persons against whom it may be enforceable.

54. **THIS COURT ORDERS AND REQUESTS** the aid and recognition of any court of any judicial, regulatory or administrative body in any province or territory of Canada (including

the assistance of any court in Canada pursuant to section 17 of the CCAA) and of any other nation or state, to act in aid of and to be complementary to this Court in carrying out the terms of this Claims Procedure Order. All courts, tribunals, and regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Debtors and the Monitor, as an officer of the Court, as may be necessary or desirable to give effect to this Claims Procedure Order or to assist the Debtors and the Monitor and their respective agents in carrying out the terms of this Claims Procedure Order.

55. **THIS COURT ORDERS** that this Claims Procedure Order and all of its provisions are effective as of 12:01 a.m. Eastern Time on the date of this Claims Procedure Order, and is enforceable without any need for entry and filing.

A handwritten signature in blue ink is written over a horizontal line. The signature is stylized and appears to be "Peng 3".

SCHEDULE “A” – NOTICE TO CREDITORS

Court File No. CV-25-00735482-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

IN THE MATTER OF THE *COMPANIES’ CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c.C-36 AS AMENDED

B E T W E E N:

THE VANCOR GROUP INC.

Applicant

- and -

2744364 ONTARIO LIMITED o/a TRUE NORTH CANNABIS CO.,
2668905 ONTARIO INC. o/a BAMBOO BLAZE, AND 2767888 ONTARIO
INC.

Respondents (Debtors)

**NOTICE OF THE CLAIMS PROCEDURE FOR THE DEBTORS IN THE CCAA
PROCEEDINGS**

NOTICE OF CLAIMS BAR DATE FOR CLAIMS

NOTICE IS HEREBY GIVEN that, pursuant to an Order of the Court made on March 3, 2025, (the “**Claims Procedure Order**”) a Claims Procedure has been commenced for the purpose of identifying and determining certain claims against the Debtors. Capitalized terms under this Notice that are not otherwise defined herein have the meaning ascribed to them in the Claims Procedure Order (a copy of which is available on the “Monitor's Website” at www.insolvencies.deloitte.ca/tncc).

PLEASE TAKE NOTICE that the Claims Procedure applies to Claims, as described in the Claims Procedure Order. The Claims Procedure has called for Claims which includes *Pre-Filing Claims*, *D&O Claims*, and *Restructuring Claims*. Any creditor who has not received a Proof of Claim Document Package and who believes that he or she has a Claim against the Debtors under the Claims Procedure Order in excess of \$10,000, or has a Claim under \$10,000, which was not listed in the Creditor under \$10k List (which list is displayed on the Monitor’s Website), must contact the Monitor in order to obtain a Proof of Claim form or visit the Monitor’s Website in order to download same.

THE CLAIMS BAR DATE IS 5:00 P.M. (TORONTO TIME) ON APRIL 7, 2025. This bar date applies to all Pre-Filing Claims and D&O Claims. Proofs of Claim must be completed

and filed with the Monitor using the procedures required in the Claims Procedure Order so that they are received by the Monitor on or before the Pre-Filing Claims Bar Date.

IF YOU HAVE A CLAIM UNDER \$10,000 against the Debtors which is described in the correct amount or an amount you deem acceptable on the Creditors under \$10k List you do not need to file a Proof of Claim. Your Claim will be deemed filed and accepted in the amount set out on the Creditors under \$10k List without any further action by you. Nothing further needs to be filed by you. If you disagree with your Claim value as detailed on the Monitor's Website, you must submit a Proof of Claim to the Monitor by the Claims Bar Date.

THE RESTRUCTURING CLAIMS BAR DATE IS 5:00 P.M. (TORONTO TIME) ON THE DATE THAT IS THE LATER OF: (I) APRIL 7, 2025, AND (II) THE DATE THAT IS 15 DAYS AFTER THE DATE ON WHICH THE MONITOR SENDS A PROOF OF CLAIM DOCUMENT PACKAGE TO THE CREDITOR WITH RESPECT TO SUCH RESTRUCTURING CLAIM. Proofs of Claim in respect of Restructuring Claims must be completed and filed with the Monitor using the procedures required in the Claims Procedure Order so that they are received by the Monitor on or before the Restructuring Claims Bar Date.

HOLDERS OF CLAIMS (OTHER THAN CREDITORS UNDER \$10K WHOSE CLAIM IS CORRECTLY SET OUT IN THE CREDITORS UNDER \$10K LIST) WHO DO NOT FILE A PROOF OF CLAIM BY THE CLAIMS BAR DATE OR THE RESTRUCTURING CLAIMS BAR DATE, AS APPLICABLE, SHALL BE FOREVER EXTINGUISHED AND BARRED FROM ASSERTING THEIR CLAIMS AGAINST THE DEBTORS OR THE DIRECTORS AND OFFICERS OF THE DEBTORS.

CREDITORS REQUIRING INFORMATION or claims documentation may contact the Monitor. The Monitor's contact details for additional information relating to the Initial Order, the CCAA Proceedings, or the Claims Procedure is:

DELOITTE RESTRUCTURING INC.

Attention: In its capacity as Court Appointed Monitor of
2744364 Ontario Limited, et al.
8 Adelaide Street West, Suite 200
Toronto, ON, M5H 0A9
Telephone: 1-855-643-3382
Email: truenorthcc@deloitte.ca

SCHEDULE “B” - INSTRUCTION LETTER FOR CLAIMS PROCEDURE

Court File No. CV-25-00735482-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE**

IN THE MATTER OF THE *COMPANIES’ CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c.C-36 AS AMENDED

B E T W E E N:

THE VANCOR GROUP INC.

Applicant

- and -

2744364 ONTARIO LIMITED o/a TRUE NORTH CANNABIS CO.,
2668905 ONTARIO INC. o/a BAMBOO BLAZE, AND 2767888 ONTARIO
INC.

Respondents (Debtors)

**INSTRUCTION LETTER FOR CLAIMS
PROCEDURE**

CLAIMS PROCEDURE

By Order of the Ontario Superior Court of Justice (Commercial List) dated March 3, 2025 (the “**Claims Procedure Order**”) under the *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C- 36, as amended (the “**CCAA**”), the Applicant and Deloitte Restructuring Inc., in its capacity as Court-appointed Monitor of the Applicant (in such capacity, the “**Monitor**”), have been authorized to conduct a Claims Procedure (the “**Claims Procedure**”). A copy of the Claims Procedure Order and other public information concerning these proceedings can be obtained from the Monitor’s website at: www.insolvencies.deloitte.ca/tncc (the “**Monitor’s Website**”).

This letter provides general instructions for completing a Proof of Claim form. Defined terms not defined within this instruction letter shall have the meaning ascribed thereto in the Claims Procedure Order.

The Claims Procedure is intended to identify and determine the amount of certain Claims against the Debtors, and claims against the Directors or Officers of the Debtors.

Please review the Claims Procedure Order for the full terms of the Claims Procedure. Both documents are available on the Monitor’s Website.

FOR CREDITORS UNDER \$10K

IF YOU AGREE WITH THE DEBTORS' ASSESSMENT OF YOUR CLAIM IN THE AMOUNT POSTED ON THE MONITOR'S WEBSITE, YOU NEED NOT TAKE FURTHER ACTION.

IF YOU WISH TO DISPUTE THE ASSESSMENT OF YOUR CLAIM, ASSERT A D&O CLAIM OR A RESTRUCTURING CLAIM, YOU MUST COMPLETE A PROOF OF CLAIM AND DELIVER IT TO THE MONITOR BEFORE THE CLAIMS BAR DATE OR THE RESTRUCTURING CLAIMS BAR DATE, AS APPLICABLE, AT:

DELOITTE RESTRUCTURING INC.

Attention: In its capacity as Court Appointed Monitor of
2744364 Ontario Limited, et al.
8 Adelaide Street West
Toronto, ON, M5H 0A9
Telephone: 1-855-643-3382
E-mail: truenorthcc@deloitte.ca

**FOR CREDITORS OVER \$10K AND FOR CREDITORS UNDER \$10K THAT
DISAGREE WITH AMOUNT OF THEIR CLAIM ON
THE CREDITORS UNDER \$10K LIST**

FOR CREDITORS SUBMITTING A PROOF OF CLAIM

All Creditors with Claims, other than Creditors under \$10k who agree with their Claim as described in the Creditors under \$10k List, must file a Proof of Claim. All Proofs of Claim, notices and inquiries with respect to the Claims Procedure should be directed to the Monitor by electronic or digital transmission, prepaid registered mail, courier, or personal delivery, at the address below:

DELOITTE RESTRUCTURING INC.

Attention: In its capacity as Court Appointed Monitor of
2744364 Ontario Limited, et al.
8 Adelaide Street West
Toronto, ON, M5H 0A9
Telephone: 1-855-643-3382
E-mail: truenorthcc@deloitte.ca

All Proofs of Claim other than Restructuring Claims, must be received by the Monitor before 5:00 p.m. (Toronto Time) on April 7, 2025 (the “**Claims Bar Date**”), subject to the provisions of the Claims Procedure Order.

All Proofs of Claim for Restructuring Claims must be received by the Monitor on the date that is the later of: (i) April 7, 2025, and (ii) fifteen (15) calendar days following the date on which the

Monitor sends a Proof of Claim Document Package with respect to such Restructuring Claim (the “**Restructuring Claims Bar Date**”), subject to the provisions of the Claims Procedure Order. If you do not file a Proof of Claim in respect of any such Restructuring Claim by the Restructuring Claims Bar Date, any Restructuring Claim that you may have shall be forever extinguished and barred.

All Claims are presumed to be in Canadian Dollars. Denominations in any other currency shall be converted to Canadian Dollars at the relevant exchange rate on the Filing Date.

ADDITIONAL FORMS

Additional Proof of Claim forms can be obtained from the Monitor’s Website at www.involvements.deloitte.ca/tccc or by contacting the Monitor at 1-855-643-3382 or truenorthcc@deloitte.ca.

DATED this ● day of ●, 2025

SCHEDULE “C” - PROOF OF CLAIM FORM

Court File No. CV-25-00735482-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

IN THE MATTER OF THE *COMPANIES’ CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c.C-36 AS AMENDED

B E T W E E N:

THE VANCOR GROUP INC.

Applicant

- and –

2744364 ONTARIO LIMITED o/a TRUE NORTH CANNABIS CO.,
2668905 ONTARIO INC. o/a BAMBOO BLAZE, AND 2767888 ONTARIO
INC.

Respondents (Debtors)

**PROOF OF CLAIM FORM FOR CLAIMS AGAINST THE DEBTORS
OR CLAIMS AGAINST THE DIRECTORS AND OFFICERS**

1. PARTICULARS OF CREDITOR

Full Legal Name of Creditor:	
Full Mailing Address of Creditor:	
Telephone Number of Creditor:	
E-mail Address of Creditor:	
Attention (Contact Person):	

2. PARTICULARS OF ORIGINAL CREDITOR FROM WHOM YOU ACQUIRED THE CLAIM, IF APPLICABLE:

(a) Have you acquired this Claim by assignment?

Yes ☐ No ☐

(if yes, attach documents evidencing assignment)

a. Full Legal Name of original creditor(s):

3. PROOF OF CLAIM

THE UNDERSIGNED CERTIFIES AS FOLLOWS:

That I am a Creditor [or hold the position of _____, the Creditor]
and have knowledge of all the circumstances connected with the Claim described herein;

That I have knowledge of all the circumstances connected with the Claim described and set out below;

The Debtor was and is still indebted to the Creditor as follows:

All Claims are presumed to be in Canadian Dollars. Denominations in any other currency shall be converted to Canadian Dollars at the relevant exchange rate on the Filing Date.

	Class of Claim Against the Debtor OR Directors and/or Officers (Pre-Filing Claim, Restructuring Claim, D&O Claim)	Amount of Claim Against the Debtor (include the foreign currency if not Canadian Dollars)
1.		\$
2.		\$
3.		\$
TOTAL AMOUNT OF CLAIMS		\$

4. NATURE OF CLAIM

(CHECK AND COMPLETE APPROPRIATE CATEGORY)

☐ Total Unsecured Claim of \$ _____

☐ Total Secured Claim of \$ _____

In respect of this debt, I hold security over the assets of _____
valued at \$ _____, the particulars of which security and value are attached to
this Proof of Claim form.

(If the Claim is secured, provide full particulars of the security, including the date on which the security was given the value for which you ascribe to the assets charged by your security, the basis for such valuation and attach a copy of the security documents evidencing the security).

5. PARTICULARS OF CLAIM:

The particulars of the undersigned's total Claims (including Pre-Filing Claims, Restructuring Claims or any D&O Claims) are attached.

Provide full particulars of the Claim(s) and supporting documentation you are asserting a Claim against, the amount, description of transaction(s) or agreement(s) giving rise to the Claim(s), name of any guarantor(s) which has guaranteed the Claim(s), and amount of Claim(s) allocated thereto, date and number of all invoices, particulars of all credits, discounts, etc. claimed. In the event that any part of your claim also includes a claim amount against the Directors and Officers, please particularize the exact amount claimed against the Directors and Officers and the accompanying legal analysis. If you fail to sufficiently explain the legal analysis in respect of any claim against the Directors and Officers, that portion of the claim will be revised or disallowed.

FILING OF CLAIM

For Pre-Filing Claims and D&O Claims, this Proof of Claim must be returned to and received by the Monitor by 5:00 p.m. (Toronto Time) on the Claims Bar Date (April 7, 2025).

For Restructuring Claims, this Proof of Claim must be returned to and received by the Monitor by 5:00 p.m. (Toronto Time) on the date that is the later of: (i) April 7, 2025, and (ii) fifteen (15) calendar days following the date on which the Monitor sends a Proof of Claim Documents Package with respect to such Restructuring Claim.

In each case, completed forms must be delivered by email, prepaid registered mail, courier, or personal delivery to the Monitor at the following address:

DELOITTE RESTRUCTURING INC.

Attention: In its capacity as Court Appointed Monitor of
2744364 Ontario Limited, et al.
8 Adelaide Street West

Toronto, ON, M5H 0A9
Telephone: 1-855-643-3382
E-mail: truenorthcc@deloitte.ca

Dated at _____ this _____ day of _____, 2025.

Witness Name: _____

Signature of Creditor: _____

Name of Creditor: _____

If Creditor is an entity, print name and title of authorized signatory:

Title: _____

Signature of authorized signatory: _____

Name of authorized signatory: _____

SCHEDULE “D” - NOTICE OF REVISION OR DISALLOWANCE

For persons who have asserted Claims against the Debtors and/or D&O Claims against the Directors and/or Officers of the Debtors

TO: [INSERT NAME AND ADDRESS OF CLAIMANT] (the “Claimant”)

RE: Claim Reference Number: _____

Capitalized terms used but not defined in the Notice of Revision or Disallowance shall have the meanings ascribed to them in the Order of the Ontario Superior Court of Justice (Commercial List) in the CCAA proceedings of the Debtors dated **March 3, 2025** (the “**Claims Procedure Order**”). You can obtain a copy of the Claims Procedure Order on the Monitor’s Website at: www.insolvencies.deloitte.ca/tccc

Pursuant to the Claims Procedure Order, the Monitor hereby gives you notice that the Monitor, in consultation with the Debtors, have reviewed your Proof of Claim or D&O Proof of Claim and have revised or disallowed all or part of your purported Claim set out therein for voting and/or distribution purposes. Subject to further dispute by you in accordance with the Claims Procedure Order, your Claim will be as follows:

Prefiling Claims

	Amount as Submitted		Amount allowed by the Monitor for voting purposes:	Amount allowed by the Monitor for distribution purposes:
	Currency			
A. Unsecured		\$	\$	\$
B. Priority		\$	\$	\$
C. D&O Claim		\$	\$	\$
D. Total Claim		\$	\$	\$

Restructuring Claims

	Amount as Submitted		Amount allowed by the Debtors’ for voting purposes:	Amount allowed by the Debtors for distribution purposes:
	Currency			
A. Unsecured		\$	\$	\$
B. Priority		\$	\$	\$
C. D&O Claim		\$	\$	\$
D. Total Claim		\$	\$	\$

Reasons for Revision or Disallowance:

SERVICE OF DISPUTE NOTICES

If you intend to dispute your Claim specified in this Notice of Revision or Disallowance for voting and/or distribution purposes, you must, by no later than 5:00 p.m. (Toronto time) on the day that is **fourteen (14) days after this Notice of Revision or Disallowance is deemed to have been received by you** (in accordance with paragraph 33 of the Claims Procedure Order), deliver a Notice of Dispute of Revision or Disallowance to the Monitor (by prepaid ordinary mail, registered mail, courier, personal delivery or email) at the address listed below.

If you do not dispute this Notice of Revision or Disallowance in the prescribed manner and within the aforesaid time period, your Claim shall be deemed to be as set out herein.

If you agree with this Notice of Revision or Disallowance, there is no need to file anything further with the Monitor.

The address of the Monitor is set out below:

DELOITTE RESTRUCTURING INC.

Attention: In its capacity as Court Appointed Monitor of
2744364 Ontario Limited, et al.
8 Adelaide Street West
Toronto, ON, M5H 0A9
Telephone: 1-855-643-3382
E-mail: truenorthcc@deloitte.ca

In accordance with the Claims Procedure Order, notices shall be deemed received by the Monitor upon actual receipt thereof by the Monitor during normal business hours on a Business Day, or if delivered outside of normal business hours, on the next Business Day

The form of Notice of Dispute of Revision or Disallowance is enclosed and can also be accessed on the Monitor's website at www.insolvencies.deloitte.ca/tncc.

IF YOU FAIL TO FILE A NOTICE OF DISPUTE OF REVISIONS OR DISALLOWANCE WITHIN THE PRESCRIBED TIME PERIOD, THIS NOTICE OF REVISION OR DISALLOWANCE WILL BE BINDING UPON YOU.

DATED this ● day of ●, 2025

DELOITTE RESTRUCTURING INC., solely in its
capacity as Court Appointed Monitor of 2744364 Ontario
Limited, et al. and not in its personal or corporate capacity

Per: _____

SCHEDULE “E” - NOTICE OF DISPUTE OF REVISION OR DISALLOWANCE

With respect to Claims against the Debtors and/or D&O Claims against the Directors and/or Officers of the Debtors

Capitalized terms used but not defined in the Notice of Revision or Disallowance shall have the meanings ascribed to them in the Order of the Ontario Superior Court of Justice (Commercial List) in the CCAA proceedings of the Debtors dated **March 3, 2025** (the “Claims Procedure Order”). You can obtain a copy of the Claims Procedure Order on the Monitor’s website at: www.insolvencies.deloitte.ca/tccc

1. Particulars of the Holder of the Claim:

Claims Reference Number: _____

Full Legal Name of Claimant (include trade name, if different)

(the “**Claimant**”)

Full Mailing Address of the Claimant:

Other Contact Information of the Claimant:

Telephone Number: _____

Email Address: _____

Facsimile Number: _____

Attention (Contact Person): _____

2. Particulars of original Claimant from whom you acquired the Claim or D&O Claim (if applicable):

Have you acquired this Claim by assignment?¹

Yes: [] No: []

If yes, and if not already provided, attach documents evidencing assignment.

Full Legal Name of original Claimant(s): _____

3. Dispute of Revision or Disallowance of Claim:

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

Prefiling Claims

	Currency	Amount allowed by the Monitor in the Notice of Revision or Disallowance for voting/distribution purposes:	Amount claimed by Claimant for voting/distribution purposes:
A. Unsecured			
<i>Voting</i>		\$	\$
<i>Distribution</i>		\$	\$
B. Priority			
<i>Voting</i>		\$	\$
<i>Distribution</i>		\$	\$
C. D&O Claim			
<i>Voting</i>		\$	\$
<i>Distribution</i>		\$	\$
D. Total Claim			
<i>Voting</i>		\$	\$
<i>Distribution</i>		\$	\$

¹ Only select 'Yes' if you have been transferred the Claim being referenced herein from another Person.

Restructuring Claims

	Currency	Amount allowed by the Monitor in the Notice of Revision or Disallowance for voting/distribution purposes:	Amount claimed by Claimant for voting/distribution purposes:
A. Unsecured			
<i>Voting</i>		\$	\$
<i>Distribution</i>		\$	\$
B. Priority			
<i>Voting</i>		\$	\$
<i>Distribution</i>		\$	\$
C. D&O Claim			
<i>Voting</i>		\$	\$
<i>Distribution</i>		\$	\$
D. Total Claim			
<i>Voting</i>		\$	\$
<i>Distribution</i>		\$	\$

(Insert particulars of your Claim per the Notice of Revision or Disallowance, and the value of your Claim as asserted by you).

4. Reasons for Dispute:

Provide full particulars of why you dispute the revision or disallowance of your Claim as set out in the Notice of Revision or Disallowance, and provide all supporting documentation, including amount, description of transaction(s) or agreement(s) giving rise to the Claim, name of any guarantor(s) which has guaranteed the Claim, and amount of Claim allocated thereto, date and number of all invoices, particular of all credits, discounts, etc. claimed, as well as a description of the security, if any, granted to the Claimant and the estimated value of such security. The particulars provided must support the value of the Claim as stated by you in item 3, above.

5. Certification

I hereby certify that:

I am the Claimant or an authorized representative of the Claimant.

I have knowledge of all the circumstances connected with this Claim.

The Claimant submits this Notice of Dispute of Revision or Disallowance in respect of the Claim referenced above.

All available documentation in support of the Claimant's dispute is attached.

All information submitted in this Notice of Dispute of Revision or Disallowance must be true, accurate, and complete. Filing false information relating to your Claim may result in your Claim being disallowed in whole or in part and may result in further penalties.

Witness:

Signature: _____

(signature)

Name: _____

(print)

Title: _____

Dated at _____ this _____ day of _____, 2025.

This Notice of Dispute of Revision or Disallowance **MUST** be returned to and received by the Monitor at the below address **by no later than 5:00 p.m. (Toronto time) on the day that is fourteen (14) days after this Notice of Revision or Disallowance is deemed to have been received by you** (in accordance with the Claims Procedure Order, a copy of which can be found on the Monitor's website at www.insolvencies.deloitte.ca/tbcc).

Delivery to the Monitor may be made by ordinary prepaid mail, registered mail, courier, personal delivery or email to the address below.

DELOITTE RESTRUCTURING INC.

Attention: In its capacity as Court Appointed Monitor of North American Fur Auction Inc.

8 Adelaide Street West

Toronto, ON, M5H 0A9

Telephone: 1- 855-643-3382

E-mail: truenorthcc@deloitte.ca

In accordance with the Claims Procedure Order, notices shall be deemed received by the Monitor upon actual receipt thereof by the Monitor during normal business hours on a Business Day, or if delivered outside of normal business hours, on the next Business Day

The form of Notice of Dispute of Revision or Disallowance is enclosed and can also be accessed on the Monitor's website at www.insolvencies.deloitte.ca/tbcc.

**IF YOU FAIL TO FILE A NOTICE OF DISPUTE OF REVISION OR DISALLOWANCE
WITHIN THE PRESCRIBED TIME PERIOD, YOUR CLAIM AS SET OUT IN THE
NOTICE OF REVISION OR DISALLOWANCE WILL BE BINDING UPON YOU.**

THE VANCOUR GROUP INC.
Applicant

and

2744364 ONTARIO LIMITED, *ET AL*
Respondents (Debtors)

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

Proceeding Commenced at Toronto

CLAIMS PROCEDURE ORDER

MILLER THOMSON LLP

Scotia Plaza
40 King Street West, Suite 5800
P.O. Box 1011
Toronto ON M5H 3S1

Larry Ellis LSO# 49313K

Email: lellis@millerthomson.com
Tel: 416.595.8639

David S. Ward LSO# 33541W

Email: dward@millerthomson.com
Tel: 416.595.8625

Patrick Corney LSO# 65462N

Email: pcorney@millerthomson.com
Tel: 416.595.8555

Lawyers for the Applicant, The Vancor Group Inc.