



COURT FILE NUMBER 1603 09140 ✓  
 COURT COURT OF QUEEN'S BENCH OF ALBERTA  
 JUDICIAL CENTRE EDMONTON  
 PLAINTIFF ROYAL BANK OF CANADA  
 DEFENDANT GRAHAM BROTHERS CONSTRUCTION GROUP LTD.

DOCUMENT ORDER

i hereby certify this to be a true copy of the original.

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT  
 Ogilvie LLP  
 1400, 10303 Jasper Avenue  
 Edmonton AB T5J 3N6  
 Attention: Kentigern A. Rowan, Q.C.  
 Phone: 780.429.6236  
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 File No.: 3089.57

*Cholloway*  
 for Clerk of the Court

**Service will be accepted by delivery or fax. No other form of service will be accepted.**

DATE ON WHICH ORDER WAS PRONOUNCED: March 23, 2017  
 NAME OF JUSTICE WHO MADE THIS ORDER: Justice R. P. Belzil  
 LOCATION WHERE THE ORDER WAS PRONOUNCED: Edmonton, Alberta

**ORDER**

UPON THE APPLICATION of Deloitte Restructuring Inc. ("Deloitte") in its capacity as Court-Appointed Receiver of the property of Graham Brothers Construction Group Ltd. ("Graham Brothers"); AND UPON noting that Deloitte wishes to sell substantially all of the remaining assets and equipment of Graham Brothers as outlined in the attached Schedule "A" (the "Assets"); AND UPON being advised that Deloitte has approached three auction companies in respect of purchasing the Assets to be sold by way of public auction (the "Auction Proposals"); AND UPON being advised that Deloitte has received a further two offers from third party purchasers (the "Purchase Offers"); AND UPON being advised that it is Deloitte's opinion that the Purchase Offer received from Fourpoint Industrial Services Inc. ("Fourpoint") is superior to the Auction Proposals and the other Purchase Offer; AND UPON noting that the terms and

conditions of the offers received by Deloitte, particularly the amounts offered to purchase the Assets, are commercially sensitive and may affect the total amount recoverable from the sale of the Assets if disclosed prior to the conclusion of a sale; AND UPON reading the Ninth Report of the Receiver, and the Confidential Addendum thereto; AND UPON reading the Affidavit of Service of Notice of this Application; AND UPON hearing counsel for Deloitte; IT IS HEREBY ORDERED AND ADJUDGED THAT:

1. Service of notice of this Application and supporting materials including, but not limited to, the Ninth Report of the Receiver in the manner described in the Affidavit of Service is hereby deemed good and sufficient and time for service is abridged as required.
2. Deloitte is hereby authorized to proceed with the sale of the Assets outlined in the attached Schedule "A" to Fourpoint in accordance with and for the price set forth in the Offer to Purchase attached as Appendix "E" to the Confidential Addendum of the Receiver's Ninth Report, and the sale of the Assets to Fourpoint is hereby approved with such minor amendments as Deloitte may deem necessary.
3. Deloitte is hereby authorized and directed to take such additional steps and execute such additional documents as may be necessary or desirable for the completion of the sale of the Assets.
4. Deloitte shall receive and retain the proceeds from the sale of the Assets for the benefit of the creditors of Graham Brothers and shall not disburse the same except in accordance with the Orders granted in this Action or on further Order of the Court.
5. The Ninth Report of the Receiver is hereby accepted and approved by this Honourable Court.
6. The Confidential Addendum to the Ninth Report of the Receiver is hereby accepted and approved, and shall remain unfiled until such a time as the sale of the Assets has concluded, at which time Deloitte shall file and serve the same.



J.C.Q.B.A.

**Graham Brothers Equipment For Sale "Schedule A"**

Asset Unit #	Manufacturer	Model	Year	Equipment Description	Vin#/Serial#	
AT-158	APE	APE HD80 Helical Pile Driver with 13.375"Clamp	2015	Piling Head	20150101	Included
AT-159	John Deere	Pallet Forks For HL760K Loader		Forks	N/A	Included
AT-160	APE	APE HD200 Helical Pile Driver with 18"Clamp	2015	Piling Head	20130902	Included
AT-162	APE	APE HD80 Helical Pile Driver with 13.375"Clamp	2015	Piling Head	20150802	Included
AT-164	Brandt	Pipe Grapple For HL760K PN:WL0180-PG120-72		Pipe Grapple	510427	Included
AT-166	EFI	Pipe Grapple For HL760K Loader PN:WL40s	2015	Pipe Grapple	W40SGP0979-120	Included
BH-150	Caterpillar	324E Hydraulic Excavator with 2 buckets	2014	Excavator	CAT0324ETPNW01394	Included
BH-157	Caterpillar	374DL Hydraulic Excavator For Piling Head	2013	Excavator	CAT0374DTPAP00292	Included
SE-220	Florens	20ft SeaCan Jobshack Mounted on 30ft Skid		Sea Can	FSCU366208	Included
WL-160	Hyundai	HL760-9A Wheel Loader With ISO Quick Attach Coupler	2014	Wheel Loader	HLL04ED0000124	Included
WL-163	Hyundai	HL760-9A Wheel Loader With ISO Quick Attach Coupler	2014	Wheel Loader	HLL04ED0000245	Included
PE-001	APE	11.75" Polar Penetrator Bit	2015	Polar Penetrator Bit	DTHA039	Included
PE-002	APE	11.75" Polar Penetrator Bit	2015	Polar Penetrator Bit	DTHA040	Included
PE-007	APE	7"x20' - 120MM/F Drill Extension	2015	Drill Extension	DTHEX028	Included
PE-008	APE	7"x20' - 120MM/F Drill Extension	2015	Drill Extension	DTHEX029	Included
PE-009	APE	7"x20' - 120MM/F Drill Extension	2015	Drill Extension	DTHEX030	Included
PE-010	APE	7"x20' - 120MM/F Drill Extension	2015	Drill Extension	DTHEX031	Included
PE-011	APE	7"x20' - 120MM/F Drill Extension	2015	Drill Extension	DTHEX032	Included
PE-012	APE	7"x20' - 120MM/F Drill Extension	2015	Drill Extension	DTHEX033	Included
PE-013	APE	7"x20' - 120MM/F Drill Extension	2015	Drill Extension	DTHEX034	Included
PE-014	APE	7"x20' - 120MM/F Drill Extension	2015	Drill Extension	DTHEX035	Included
PE-015	APE	7"x20' - 120MM/F Drill Extension	2015	Drill Extension	DTHEX036	Included
PE-016	APE	9.625" Pre-Drill Adaptor	2015	Hybrid Drv Head Adaptor	HDHA010	Included
PE-017	APE	9.625* Pre-Drill Adaptor	2015	Hybrid Drv Head Adaptor	HDHA011	Included
PE-018	APE	9.625* Pre-Drill Adaptor	2015	Hybrid Drv Head Adaptor	HDHA012	Included
PE-019	FOURPOINT	2.5" Manifold for Air compressor	2015	Manifold	na	Included
PE-020	FOURPOINT	2.5" Manifold for Air compressor	2015	Manifold	na	Included
PE-021	FOURPOINT	2.5" Manifold for Air compressor	2015	Manifold	na	Included
BH-152	Caterpillar	324E Hydraulic Excavator with 2 buckets	2014	Excavator	CAT0324EJPNW01267	Included
SS-124	Caterpillar	299DXHP CAT Tracked Skid Steer	2013	Skid Steer	CAT0299DENLCO0688	Included
		10 FOOT WHITE SEACAN				Included
BH-156	Caterpillar	365 excavator	2008	Excavator	CAT0365CKMCS00488	Included
at-178		305 hoe packer				Included
		cat skid steer bucket 7671				Included
						Included
		generac gp5500 gen set				Included
		gererac gp6500 gen set				Included
		makita 2400 gen set				Included
AT-161		HD200 Piling Head				Included
Lead	APE	Lead system for driven Piles (New Never Used)				Included
Pallets of additional items pertaining to equipment, includes hi flow filters, head plates, retainers, wiring harnesses for tourque pin monitors, torque pins and monitors, jaws for clamps, miscelanious hardware, knuckle for 365 along with hoses and hardware.						Included