



No. S-220231
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY AND INSOLVENCY,**

**IN THE MATTER OF THE RECEIVERSHIP OF
OTSO GOLD CORP.**

BETWEEN:

**PANDION MINE FINANCE LP, RIVERMET RESOURCE CAPITAL LP
AND PFL RAAHE HOLDINGS LP**

PETITIONERS

AND:

OTSO GOLD CORP.

RESPONDENT

NOTICE OF APPLICATION
(ORDER APPROVING SALE)

Names of applicants: Deloitte Restructuring Inc., in its capacity as the court-appointed receiver and manager (in such capacity, the “**Receiver**”) of the assets, property and undertaking of Otso Gold Corp. (the “**Debtor**”)

To: The Service List (attached as Schedule “A”)

TAKE NOTICE that an application will be made by the Applicants **BY MS TEAMS** to Mr. Justice Gomery at the courthouse at 800 Smithe Street, Vancouver, British Columbia, V6Z 2E1 on April 12, 2022 at 9:00a.m.. for the order set out in Part 1 below.

Part 1: ORDERS SOUGHT

1. An order (the “**Approval and Vesting Order**”) substantially in the form attached as **Schedule “B”** which, among other things, authorizes and directs the Receiver to conclude the sale transaction (the “**Sale Transaction**”) contemplated in the Asset Purchase Agreement dated as of April 4, 2022 (the “**Contract**”) between the Receiver and CAVU Mining Corp. (the “**Purchaser**”), in substantially the same form that is attached as Appendix “B” to the Report of the Receiver dated April 6, 2022 (the “**Report**”).

2. An order (the “**Sealing Order**”) substantially in the form attached as **Schedule “C”**.

3. Such further and other orders, declarations, and directions as counsel may request and this Honourable Court deems to be just and convenient in the circumstances.

Part 2: FACTUAL BASIS

4. The Debtor is incorporated in Alberta, and extra-provincially registered in British Columbia. Its previous names are Nordic Gold Inc. (until December 9, 2019), Nordic Gold Corp (until December 20, 2018) and Firesteel Resources Inc. (until October 4, 2018).

5. On January 14, 2022, this Honourable Court appointed the Receiver over the Debtor's assets, property and undertaking. This order was made on an interim basis, pending release of reasons. Reasons for judgment were issued on January 28, 2022, and a final Receivership Order was entered on February 2, 2022.

6. The Debtor's assets included 49% joint venture interest in a copper property in Northern BC, which is comprised of 19 mineral claim licences in the Atlin Mining Division (the "**JV Property**"). The JV Property is subject to a Joint Venture Agreement dated August 20, 2016 between the Debtor (under its former name, Firesteel Resources Inc.) and the 51% JV participant (the "**Operator**").

Creditors of the Debtor

7. The Petitioners are the sole secured creditor of the Debtor. Their security includes, among other things, a general security agreement from the Debtor in respect of all of its present and after acquired personal property, registered in the BC and Alberta Personal Property Registries.

Sale of Assets

8. The Operator advised the Receiver that it had been exploring the market for potential partners to acquire the Debtor's 49% interest in the JV Property, and that this effort began in February 2019. The Operator advised that this included it contacting nine (9) parties, resulting in two (2) offers. The Operator advises that it was not able to advance the offers received due to lack of engagement or response from the Debtor.

9. The Receiver determined that a short and focused sale process targeting strategic parties would be the most efficient and economical option to market and sell the JV Property. Accordingly, the Receiver initiated a sale process on February 25, 2022. This included:

- (a) circulating a request for letters of intent to approximately 15 potential purchasers, posting the request to the Receiver's website and advertising the request in the Insolvency Insider newsletter;
- (b) offers were to be submitted by March 25, 2022;
- (c) establishing an electronic data room for potential purchasers, and granted access to parties that executed confidentiality agreements; and
- (d) discussions with potential purchasers, including obtaining information from the Operator where necessary and appropriate.

10. The Receiver determined that the Purchaser's offer represented the best transaction available in the circumstances, and executed the Contract. The key commercial terms of the Contract include that the sale is on an "as-is, where-is" basis without representation. The Contract contemplates court-approval on or before April 14, 2022 and closing on or before April 26, 2022.

Sealing Order for Confidential Supplement

11. To assist the Court in assessing the Sale Transaction, the Receiver has prepared a Confidential Supplement to the Report. This Confidential Supplement includes, among other things, commercially sensitive or confidential information in respect of the assets and the sale process. Accordingly, the Receiver will be seeking a sealing order to protect the information contained in the Confidential Supplement.

Urgency and Notice

12. The terms of the Sale Transaction include, among other things, court approval by April 14, 2022 and closing by April 26, 2022. Accordingly, to facilitate closing of the transaction within these timelines, the Receiver asks that this application be heard on April 12, 2022.

13. The Receiver intends to serve this Application and the Report by posting a copy to the creditors' information website maintained by the Receiver in this matter and emailing a copy to the service list in these proceedings.

Activities of the Receiver

14. The activities of the Receiver in the course of these receivership proceedings are set out in detail in the Report. The Receiver's activities included, among other things:

- (a) correspondence and discussions with stakeholders, including the Petitioners, the board of directors of the Debtor, service providers and creditors;
- (b) arrangements to obtain records from various parties (as noted in the Report, the Receiver encountered unexpected challenges in obtaining records, although they were eventually provided);
- (c) exercising the Debtor's rights as shareholder of the subsidiaries outside of Canada to change the board of directors of the subsidiaries, which, among other things, facilitated the funding of the mine in Finland; and
- (d) the sale process, as further described in the Report and this Application.

15. As noted in the Report, the Receiver does not seek any direction at this time regarding records. However, the Report outlines issues encountered by the Receiver in respect of records for the information of stakeholders and the Court. The Receiver may seek further direction regarding records at a future application.

Part 3: LEGAL BASIS

16. The Receiver relies upon:

- (a) The Supreme Court Civil Rules, Rule 8-1 and 8-5;
- (b) The *Bankruptcy and Insolvency Act*, R.S.C. 1985, c.B-3 (the "BIA"); and
- (c) The inherent jurisdiction of this Honourable Court.

Urgency and Notice

17. Pursuant to Rule 8-5 of the *Supreme Court Civil Rules*, this Honourable Court may order that an application be heard on short notice, thereby abridging the time for service of the application. The Receiver submits that this is an urgent application that warrants an abridgement

of service such that the application is properly returnable on April 12, 2022. In particular, the Sale Transaction contains a term that requires court-approval on or before April 14, 2022. The Receiver will ensure the Application and Report are provided to the Service List by email and submits that this will ensure the affected stakeholders have sufficient notice.

General Powers and Obligations of the Receiver

18. The court may appoint a receiver to take possession of an insolvent person's property, exercise any control that the court considers advisable over that property, and to take any other action that the court considers advisable.

BIA, s. 243

19. A receiver has the obligation to act honestly and in good faith, and to deal with the property of an insolvent person in a commercially reasonable manner.

BIA, s. 247

Approval of a Sale Transaction

20. In considering a proposed sale transaction regarding the property of an insolvent person, the court considers:

- (a) whether the Receiver has made a sufficient effort made to get the best price, and not acted improvidently;
- (b) whether the interests of all parties have been considered;
- (c) the efficacy and integrity of the process by which offers are obtained; and
- (d) whether there has been unfairness in the working out of the process.

Royal Bank v. Soundair Corp., 1991 CarswellOnt 205 (Ont. C.A.), at para 16.

21. The Receiver submits the proposed transaction meets the above criteria and that it has not acted improvidently. In particular:

- (a) the Receiver undertook a strategic and targeted canvassing of the market to obtain the best value for the JV Property;

- (b) the JV Property had been marketed for at least 2 years prior to the receivership proceedings;
- (c) the market response, described in the Confidential Supplement, supports the Receiver's assessment of the offer; and
- (d) the Operator supports the Purchaser as a JV partner.

22. The Receiver has consulted with the Petitioner, as the Debtor's secured creditor, in respect of the Sale Transaction and has not been advised of any opposition to the proposed transaction.

23. In reviewing and assessing the Sale Transaction, and selecting the Purchaser's offer as the preferred offer, the Receiver has considered, among other things, that the sale process in respect of the assets was efficacious and conducted with integrity in all respects.

24. The Receiver is of the view that the Sale Transaction represents the best offer received for the assets, and that it is commercially reasonable to conclude the proposed transaction. In particular, the Receiver is satisfied that the Sale Transaction is best price in the circumstances and in the best interests of the Debtor's creditors and stakeholders. The Receiver is also of the view that a longer marketing and sale process would not be likely to yield a materially better offer. Accordingly, the Receiver seeks an order approving the Sale Transaction.

Sealing Order

25. The Receiver requires the Sealing Order authorizing it to file, under seal, the Confidential Supplement to the Report for the purpose of, among other things, protecting information regarding the market for the Purchased Assets and the Receiver's assessment of the selected offer.

26. The Court has jurisdiction to order that certain materials filed with the Court be sealed on the Court file. Such an order may be granted where:

- (a) court openness poses a serious risk to a "public interest", which is not restricted solely to the interests of the parties, but applies at the level of general principle;
- (b) such an order is necessary in order to prevent a serious risk to the identified interest, including a commercial interest, in the context of litigation because reasonable alternative measures will not prevent the risk; and

- (c) as a matter of proportionality, the salutary effects of the confidentiality order, including the effects on the right of civil litigants to a fair trial, outweigh its deleterious effects, including the effects on the right to free expression, which in this context includes the public interest in open and accessible court proceedings.

Sierra Club of Canada v. Canada (Minister of Finance), 2022 SCC 41 at para 53

Sherman Estate v. Donovan, 2021 SCC 25 at paras 38, 41-43.

27. The materials sought to be sealed fit within the above test. The Confidential Supplement contains commercially sensitive or confidential information about the marketing and value of the Debtor's assets. The public disclosure of the Confidential Supplement could materially harm the integrity of the sale process for the assets. The sealing is necessary to prevent serious risk to the Debtor's commercial interests (and the interests of its economic stakeholders) and no other person has a reasonable expectation of accessing this information. There is an important public interest in preserving the integrity of insolvency sale processes.

28. As a matter of proportionality, the Confidential Supplement will be sealed for a limited time to ensure that the salutary effects of the Sealing Order outweigh possible deleterious effects, and the Receiver submits the Sealing Order is reasonable and necessary in the circumstances.

29. The Receiver will follow the procedures of *BC Supreme Court Practice Directive PD-35*, Practice Direction, Sealing Orders, in Civil and Family Proceedings, June 1, 2012, modified as necessary due to the hearing being conducted over MS Teams.

Part 4: MATERIAL TO BE RELIED ON

30. Order made after Application dated January 28, 2022 and entered February 2, 2022;

31. The First Report of the Receiver dated April 6, 2022;

32. The Confidential Supplement to the Report dated April 6, 2022 (to be filed subject to a sealing order); and

33. Affidavit #1 of Jennifer Pepper sworn on April 5, 2022.

The Applicants estimate that the application will take **30 minutes**.

This application is not within the jurisdiction of a master. Mr. Justice Gomery is seized of these proceedings and the time for this application has been set with Scheduling.

TO THE PERSONS RECEIVING THIS NOTICE OF APPLICATION: If you wish to respond to this notice of application, you must, within 5 business days after service of this notice of application or, if this application is brought under Rule 9-7, within 8 business days after service of this notice of application,

- (a) file an application response in Form 33,
- (b) file the original of every affidavit, and of every other document, that
 - (i) you intend to refer to at the hearing of this application, and
 - (ii) has not already been filed in the proceeding, and
- (c) serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:
 - (i) a copy of the filed application response;
 - (ii) a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on that person;
 - (iii) if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7(9).

Date: April 6, 2022



Signature of Lisa Hiebert, counsel for the Receiver

To be completed by the court only:

Order made

in the terms requested in paragraphs _____ of Part 1 of this notice of application

with the following variations and additional terms:

Date: _____

Signature of Judge Master

APPENDIX

THIS APPLICATION INVOLVES THE FOLLOWING:

- discovery: comply with demand for documents
- discovery: production of additional documents
- other matters concerning document discovery
- extend oral discovery
- other matters concerning oral discovery
- amend pleadings
- add/change parties
- summary judgment
- summary trial
- service
- mediation
- adjournments
- proceedings at trial
- case plan orders: amend
- case plan orders: other
- experts
- other

Schedule "A"

NO. S-220231
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY AND INSOLVENCY

IN THE MATTER OF THE RECEIVERSHIP OF
OTSO GOLD CORP.

BETWEEN:

PANDION MINE FINANCE LP, RIVERMET RESOURCE CAPITAL LP
AND PFL RAAHE HOLDINGS LP

PETITIONERS

AND:

OTSO GOLD CORP.

RESPONDENT

SERVICE LIST
As of March 31, 2022

<p>Cassels Brock & Blackwell LLP 2200 – 885 West Georgia Street Vancouver, BC V6C 3E8 Tel: (604) 691-6100</p> <p>Attention: Mary Buttery, Q.C. Jared Enns Morgan Burris Natalie Levine</p> <p>Email: mbuttery@cassels.com jenns@cassels.com mburris@cassels.com nlevine@cassels.com</p> <p><i>Counsel for the Petitioners</i></p>	<p>Deloitte Restructuring Inc. 939 Granville Street Vancouver BC V6B 3V7</p> <p>Tel: (604) 669-4466</p> <p>Attention: Melinda McKie Naomi McGregor</p> <p>Email: MMcKie@deloitte.ca NaoMcGregor@deloitte.ca</p> <p><i>The Receiver</i></p>
<p>Borden Ladner Gervais LLP 1200 Waterfront Centre 200 Burrard Street Vancouver, BC V7X 1T2</p> <p>Attention: Lisa Hiebert Ryan Laity Jennifer Pepper</p> <p>Email: lhiebert@blg.com rlaity@blg.com jpepper@blg.com katkinson@blg.com</p> <p><i>Counsel for the Receiver</i></p>	<p>Farris LLP 25th Floor, 700 W Georgia Street Vancouver, BC V7Y 1B3 Tel: (604) 661-1712</p> <p>Attention: Rebecca Morse Tim Louman-Gardiner</p> <p>Email: rmorse@farris.com tlouman-gardiner@farris.com</p>

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Schedule "B"

No. S-220231
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY AND INSOLVENCY**

**IN THE MATTER OF THE RECEIVERSHIP OF
OTSO GOLD CORP.**

BETWEEN:

**PANDION MINE FINANCE LP, RIVERMET RESOURCE CAPITAL LP
AND PFL RAAHE HOLDINGS LP**

PETITIONERS

AND:

OTSO GOLD CORP.

RESPONDENT

ORDER MADE AFTER APPLICATION

APPROVAL AND VESTING ORDER

BEFORE THE HONOURABLE)
JUSTICE GOMERY) April 12, 2022
)

ON THE APPLICATION of Deloitte Restructuring Inc., in its capacity as Court-appointed receiver and receiver-manager (the "**Receiver**") of the assets, undertakings and properties of Otso Gold Corp. (the "**Debtor**") coming on for hearing by MS Teams at Vancouver, British Columbia, on the 12th day of April 2022; AND ON HEARING Lisa Hiebert, counsel for the Receiver, and those other counsel listed on **Schedule "A"** hereto; AND UPON READING the material filed, including the Report of the Receiver dated April 6, 2022 (the "**Report**");

THIS COURT ORDERS AND DECLARES THAT:

1. The sale transaction (the "**Transaction**") contemplated by the Asset Purchase Agreement dated April 4, 2022 (the "**Sale Agreement**") between the Receiver and CAVU Mining Corp. (the "**Purchaser**"), a copy of which is attached as Appendix "B" to the Report is hereby approved, and the Sale Agreement is commercially reasonable. The execution of the Sale Agreement by the Receiver is hereby authorized and approved, and the Receiver 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 Transaction and for

the conveyance to the Purchaser of the assets described in the Sale Agreement (the “**Purchased Assets**”).

2. Upon delivery by the Receiver to the Purchaser of a certificate substantially in the form attached as **Schedule “B”** hereto (the “**Receiver’s Certificate**”), all of the Debtor’s right, title and interest in and to the Purchased Assets described in the Sale Agreement shall vest absolutely in the Purchaser in fee simple, free and clear of and from any and all security interests (whether contractual, statutory, or otherwise), hypothecs, mortgages, trusts or deemed trusts (whether contractual, statutory, or otherwise), liens, executions, levies, charges, or other financial or monetary claims, whether or not they have attached or been perfected, registered or filed and whether secured, unsecured or otherwise (collectively, the “**Claims**”) including, without limiting the generality of the foregoing: (i) any encumbrances or charges created by the Order of this Court made January 14, 2022 and January 28, 2022; (ii) all charges, security interests or claims evidenced by registrations pursuant to the *Personal Property Security Act* of British Columbia or any other personal property registry system; and (iii) those Claims listed on **Schedule “C”** hereto (all of which are collectively referred to as the “**Encumbrances**” and, for greater certainty, this Court orders that all of the Encumbrances affecting or relating to the Purchased Assets are hereby expunged and discharged as against the Purchased Assets.
3. Upon presentation of a certified copy of this Order, together with a letter from Borden Ladner Gervais LLP, solicitors for the Receiver, authorizing registration of this Order, the British Columbia Land Title Office (Land Title District of Prince Rupert), the Mineral Titles Branch and any other public registry in which an interest in the Purchased Assets may be registered (collectively, the “**Registries**”) shall:
 - (a) Enter the Purchaser as the 49% owner (in place of Firesteel Resources Inc.) of the mineral claims identified in **Schedule “D”** hereto (the “**Mineral Claims**”) and this Court declares that it has been proved to the satisfaction of the Court on investigation that title of the Purchaser in and to the Mineral Claims is good, safe holding and marketable title and directs the Registries to register indefeasible title in favour of the Purchaser as set out above; and
 - (b) Having considered the interest of third parties, to discharge, release, delete and expunge from title to the Mineral Claims all of the registered Encumbrances.
4. For the purposes of determining the nature and priority of Claims, the net proceeds from the sale of the Purchased Assets shall stand in the place and stead of the Purchased Assets, and from and after the delivery of the Receiver’s Certificate all Claims shall attach to the net proceeds from the sale of the Purchased Assets with the same priority as they had with respect to the Purchased Assets immediately prior to the sale, as if the Purchased Assets had not been sold and remained in the possession or control of the person having had possession or control immediately prior to the sale.
5. The Receiver is to file with the Court a copy of the Receiver’s Certificate forthwith after delivery thereof.

6. Subject to the terms of the Sale Agreement, vacant possession of the Purchased Assets, including any real property, shall be delivered by the Receiver to the Purchaser at 12:00 noon on the Closing Date (as defined in the Sale Agreement), subject to the permitted encumbrances as set out in the Sale Agreement.
7. The Receiver, with the consent of the Purchaser, shall be at liberty to extend the Closing Date to such later date as those parties may agree without the necessity of a further Order of this Court.
8. Notwithstanding:
 - (a) these proceedings;
 - (b) any applications for a bankruptcy order in respect of the Debtor now or hereafter made pursuant to the *Bankruptcy and Insolvency Act* and any bankruptcy order issued pursuant to any such applications; and
 - (c) any assignment in bankruptcy made by or in respect of the Debtor,

the vesting of the Purchased Assets in the Purchaser pursuant to this Order shall be binding on any trustee in bankruptcy that may be appointed in respect of the Debtor and shall not be void or voidable by creditors of the Debtor, nor shall it constitute or be deemed to be a transfer at undervalue, fraudulent preference, assignment, fraudulent conveyance or other reviewable transaction under the *Bankruptcy and Insolvency Act* or any other applicable federal or provincial legislation, nor shall it constitute oppressive or unfairly prejudicial conduct pursuant to any applicable federal or provincial legislation.

9. THIS COURT HEREBY REQUESTS the aid and recognition of any court, tribunal, regulatory or administrative body, wherever located, to give effect to this Order and to assist the Receiver and its agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Receiver, as an officer of this Court, as may be necessary or desirable to give effect to this Order or to assist the Receiver and its agents in carrying out the terms of this Order.
10. The Receiver or any other party have liberty to apply for such further or other directions or relief as may be necessary or desirable to give effect to this Order.

11. Endorsement of this Order by counsel appearing on this application other than counsel for the Receiver is hereby dispensed with.

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 Lisa Hiebert, counsel to the Receiver

BY THE COURT

REGISTRAR

Schedule "A"

LIST OF COUNSEL

COUNSEL	PARTY REPRESENTED

Schedule "B"

Form of Receiver's Certificate

No. S-220231
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY AND INSOLVENCY

IN THE MATTER OF THE RECEIVERSHIP OF
OTSO GOLD CORP.

BETWEEN:

PANDION MINE FINANCE LP, RIVERMET RESOURCE CAPITAL LP
AND PFL RAAHE HOLDINGS LP

PETITIONERS

AND:

OTSO GOLD CORP.

RESPONDENT

RECEIVER'S CLOSING CERTIFICATE

All capitalized terms not otherwise defined herein shall have the meanings ascribed thereto in the Approval and Vesting Order, as pronounced by the Honourable Mr. Justice Gomery in these proceedings on the ____ day of April, 2022 (the "Sale Approval Order").

Pursuant to paragraph 2 of the Sale Approval Order, Deloitte Restructuring Inc., in its capacity as Receiver of the assets, properties and undertakings of Otso Gold Corp., hereby delivers and files with the Court this Certificate and hereby certifies that the Transaction contemplated in the Sale Agreement has closed and is complete in all respects.

DATED the _____ day of April, 2022

DELOITTE RESTRUCTURING INC., in its capacity
as Receiver of the properties, assets, and undertakings of
Otso Gold Corp., and not in its personal capacity:

Per:

Name:

Title:

Schedule "C"

Claims to be deleted/expunged from the Purchased Assets

Alberta Personal Property Registry

Registration No.	Registration Type	Debtor(s)	Secured Party
17112810682	Security Agreement	Firesteel Resources Inc. Nordic Gold Inc. Otso Gold Corp.	PFL Raahe Holdings LP

British Columbia Personal Property Registry

Base Registration No.	Registration Type	Debtor(s)	Secured Party
425756K	Security Agreement	Firesteel Resources Inc. Nordic Gold Inc. Otso Gold Corp.	PFL Raahe Holdings LP

Schedule "D"

Mineral Claims

The right title and interest of Otso Gold Corp (formerly Firesteel Resources Ltd.) in and to the following mineral claims in respect of cells located in the Atlin Mining Division of northwestern British Columbia, as set out in the attached table "BC Mineral Titles".

Schedule A

No. S-220231
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY AND INSOLVENCY

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AND PFL RAAHE HOLDINGS LP

PETITIONERS

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RESPONDENT

ORDER MADE AFTER APPLICATION

(SEALING ORDER)

BEFORE THE HONOURABLE
JUSTICE GOMERY

)
) April 12, 2022
)

THE APPLICATION of Deloitte Restructuring Inc., in its capacity as Court-appointed Receiver (in such capacity, the "Receiver") of the assets, undertakings and properties of Otso Gold Corp. (the "Debtor"), coming on for hearing at Vancouver, British Columbia by MS Teams, on the 12th day of April 2022; AND ON HEARING Lisa Hiebert, counsel for the Receiver, and those other counsel listed on Schedule "A" hereto; AND UPON READING the material filed, including the Receiver's Confidential Supplement to the First Report dated April 6, 2022 (the "Report");

THIS COURT ORDERS AND DECLARES THAT:

1. Access to Sealed Items permitted by:
- Counsel of Record
 - Parties on Record
 - Further Court Order
 - Others: **Counsel to the Receiver**

2. Items to be sealed

Document Name	Date filed:	Number of copies filed, including any	Duration of sealing order:	Sought:	Granted

	<i>(Date on Court Stamp)</i>	extra copies for the judge	<i>(to specific date or until further order)</i>		YES	NO
(1) <u>Entire File</u>	N/A	N/A	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(2) <u>Specific Document</u> Confidential Supplement to the Receiver's First Report to Court dated April 6, 2022	April _____, 2022	1	Until the completion of the Transaction (as defined in the Approval and Vesting Order dated April 12, 2022), as confirmed by the Receiver's filing of its Receiver's Certificate with the Court	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(3) <u>Clerk's Notes</u>	N/A	N/A	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(4) <u>Order</u>	N/A	N/A	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. Endorsement of this Order by counsel appearing on this application, other than counsel for the Receiver, is hereby dispensed with.
4. The time for service of the Notice of Application and supporting materials be and is hereby abridged such that this application is properly returnable today.

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 Lisa Hiebert
 Party Lawyer for the Receiver

BY THE COURT

 REGISTRAR

Schedule "A"

LIST OF COUNSEL

Name of Counsel	Party Represented