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COURT FILE NO.

2301-01408

COURT

COURT OF KING'S BENCH OF ALBERTA
IN BANKRUPTCY AND INSOLVENCY

JUDICIAL CENTRE

CALGARY

*IN THE MATTER OF THE BANKRUPTCY
AND INSOLVENCY ACT, RSC 1985, C B-3*

*IN THE MATTER OF THE RECEIVERSHIP
OF BRM CANADA GROUP INC.*

APPLICANT

KPMG INC., in its capacity as Court Appointed Receiver of certain
property of BRM CANADA GROUP INC.

DOCUMENT

SEALING ORDER

ADDRESS FOR
SERVICE AND
CONTACT
INFORMATION
OF PARTY
FILING THIS
DOCUMENT

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File No.: 043436-18

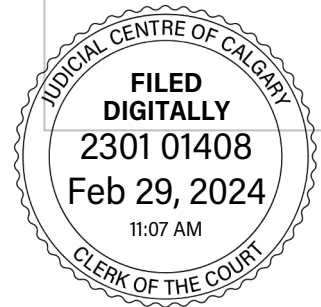
DATE ON WHICH ORDER WAS PRONOUNCED: February 28, 2024

LOCATION WHERE ORDER WAS PRONOUNCED: Calgary, AB

NAME OF JUSTICE WHO MADE THIS ORDER: The Honourable Justice M.H. Hollins

UPON THE APPLICATION by KPMG Inc. in its capacity as the Court-appointed receiver and manager (the "**Receiver**") of certain undertakings, property and assets of BRM Canada Group Inc. ("**BRM**") for an order, among other things, approving the conduct and activities of the Receiver, approving a proposed marketing and sale process (including the entering into a listing agreement), compelling the production of certain missing information and sealing the Confidential Supplement to the Report, dated February 22, 2024 (the "**Confidential Supplement**"); **AND UPON HAVING READ** the Receivership Order dated December 19, 2023 (the "**Receivership Order**"), the First Report of the Receiver dated February 22, 2024 (the "**Report**"), the Confidential Supplement and the Affidavit of Service; **AND UPON HEARING** the submissions of counsel for the Receiver and counsel to any other interested parties in attendance who wished to make submissions;

Clerk's Stamp



IT IS HEREBY ORDERED AND DECLARED THAT:

Service of the Application

1. Service of notice of the Application and supporting materials is hereby declared to be good and sufficient, and time for service of the Application is abridged to that actually given.

Sealing the Confidential Supplement

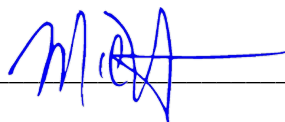
2. The Confidential Supplement shall be sealed on the Court file notwithstanding Division 4, Part 6 of the *Alberta Rules of Court*, Alta Reg 124/2010 until the earlier of:
 - (a) the filing of a Receiver's Certificate confirming that a transaction(s) for the sale of the Lands has been completed to the satisfaction of the Receiver;
 - (b) the discharge of the Receiver; or
 - (c) further order of this Honourable Court;(collectively, the "**Unsealing Date**").
3. Until the Unsealing Date, the Confidential Supplement shall be sealed and kept confidential, to be shown only to a Justice of the Court of King's Bench of Alberta, and accordingly, shall be filed with the Clerk of the Court who shall keep the Confidential Supplement in a sealed envelope attached to a notice that sets out the style of cause of these proceedings and states:

THIS ENVELOPE CONTAINS CONFIDENTIAL MATERIALS FILED IN COURT FILE NO. 2301-01408. THE CONFIDENTIAL SUPPLEMENT TO THE FIRST REPORT IS SEALED PURSUANT TO THE SEALING ORDER ISSUED BY THE HONOURABLE JUSTICE M.H. HOLLINS ON FEBRUARY 28, 2024.

4. Any person may apply to set aside paragraph 2 of this order upon providing the Receiver and all other interested parties with 5 days notice of such application.

Service of this Order

5. Service of this order shall be deemed good and sufficient by serving same on the persons and manner listed on the service list in these proceedings and by posting a copy of it on the Receiver's website at: home.kpmg/ca/brmcanada.



Justice of the Court of King's Bench of Alberta