



FORCE FILED

NO. S-222758
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

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

AND

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF
0989705 B.C. LTD., ALDERBRIDGE WAY GP LTD., and
ALDERBRIDGE WAY LIMITED PARTNERSHIP

PETITIONERS

NOTICE OF APPLICATION

Name of applicant: MNP Ltd. ("MNP") (formerly The Bowra Group Inc.), in its capacity as Monitor (the "**Monitor**") of Alderbridge Way GP Ltd., Alderbridge Way Limited Partnership and 0989705 B.C. Ltd. (collectively the "**Companies**").

To: The Service List, a copy of which is attached hereto as Schedule "A"

TAKE NOTICE that an application will be made by the Applicant to the Honourable Madam Justice Fitzpatrick at the courthouse at 800 Smithe Street, Vancouver, B.C. on May 31, 2024 at 3:00 p.m. for the orders set out in **Part 1** below.

The applicant estimates that the application will take 10 minutes.

X This matter is not within the jurisdiction of an associate judge.

Part 1: ORDERS SOUGHT

1. An order in substantially the form of draft order attached hereto as Schedule "B":
 - (a) extending the Stay Period, as defined in the Second Amended and Restated Initial Order made by the Honourable Madam Justice Fitzpatrick in these proceedings on

August 11, 2022 (the “**SARIO**”), and the other relief granted therein, from May 31, 2024 to September 6, 2024; and

- (b) approving \$460,000 in additional interim financing (the “**Additional DIP Financing**”) to be advanced by Romspen Investment Corporation (“**Romspen**”) as interim lender and a corresponding increase in the Romspen Interim Financing Charge #2 (as defined in the SARIO) from \$6.44 million to \$6.9 million.

Part 2: FACTUAL BASIS

BACKGROUND

1. Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the SARIO.
2. The Companies own the property at 7960 Alderbridge Way, and 5333 and 5411 No. 3 Road in Richmond, British Columbia (the “**Development Property**”).
3. On April 1, 2022, this Honourable Court (the “**Court**”) made an order (the “**Initial Order**”) under the *Companies’ Creditors Arrangement Act*, R.S.C. 1985 c. C-36, as amended (the “**CCAA**”), among other things, granting the Companies protection from their creditors.
4. The Court has extended the stay of proceedings under the Initial Order a number of times, most recently on February 23, 2024, when the Court granted an order extending the stay to May 31, 2024 (the “**Stay Period**”).
5. The Court has currently authorized and approved debtor in possession financing in the amount of \$8.94 million, as follows:
 - (a) \$850,000 from Gatland Development Corporation, REV Investments Inc. and South Street (Alderbridge) Limited Partnership, all of which has been fully advanced and is secured by the Interim Financing Charge (as defined in the SARIO);
 - (b) \$1.65 million from Romspen, all of which has been fully advanced and is secured by the Romspen Interim Financing Charge #1 (as defined in the SARIO); and

- (c) \$6.44 million (the “**Interim Financing**”) from Romspen, of which \$5.52 million has been advanced and is secured by the Romspen Interim Financing Charge #2 (as defined in the SARIO), leaving an additional \$920,000 that the Monitor is authorized to borrow.
6. A more comprehensive background, including the various orders granted in these proceedings, is attached as **Appendix “A”** to the Monitor’s Thirteenth Report to Court dated May 28, 2024 (the “**Thirteenth Report**”).

THE BUILDING PERMIT APPLICATION

7. As advised in the Monitor’s previous reports to Court (collectively, the “**Previous Reports**”), the Monitor submitted a new building permit application under the 2018 Building Code was submitted to the City of Richmond (the “**City**”) on November 1, 2023 which application remains under review by the City.
8. Although the preliminary estimate for approval of the new building permit was March 15, 2024, approval has been delayed due, in part, to the following:
- (a) outstanding approval from Lulu Island Energy Corporation (“**LIEC**”), a subsidiary of the City, that is responsible for the district energy systems;
 - (b) the Monitor’s review and revision of the agreements required by the LIEC; and
 - (c) changes required to the Building Permit as specified by the City’s fire chief.
9. The Monitor’s revised estimate for the issuance of the Building Permit is on or around June 30, 2024.
10. Once the building permit application is approved by the City, a letter is issued and, within 60 days of approval, the Monitor is required to pay the fees, additional development permit fees and various security deposits related to the building permit prior to issuance.
11. The City has not confirmed the amounts of such required payments, however, the Monitor understands they may be in excess of \$18 million. Once the amounts owing to the City are confirmed and agreed to by the Monitor, the Monitor will apply to Court for the necessary

increase in approved borrowings. The amount of Additional DIP Financing currently being sought by the Monitor does not include the fees and security deposits that will be required prior to issuance of the new building permit.

TIMING OF RECOMMENCEMENT OF SALE PROCESS

12. As advised in the Previous Reports, on April 25, 2022, the Monitor, with the consent of Romspen, terminated the Court-approved sales and investment solicitation process, on the basis that the sale process contemplated thereunder would be more likely to be successful if there was a new building permit in place for the Development Property.
13. The Monitor anticipates that it will seek this Court's approval of a new sale process (the "**Sale Process**") concurrently with its application for an increase in the approved borrowings required to pay all building permit related fees and security deposits.

INCREASE IN INTERIM FINANCING

14. As at the date of the Thirteenth Report, Romspen had advanced \$5.52 million of the \$6.44 million of the authorized Interim Financing facility leaving \$920,000 available to the Monitor.
15. As set out in the cash flow forecast attached as **Appendix "B"** to the Thirteenth Report, the Monitor estimates it will require the Additional DIP Financing, in the amount of \$460,000 during the period May 31 to September 6, 2024.
16. The Additional DIP Financing does not include the estimated costs related to the building permit as the amounts payable have not yet been confirmed with the City. Once those amounts are confirmed, the Monitor will make an application to Court to request an appropriate increase in the authorized financing facility.

EXTENSION OF THE STAY PERIOD

17. The current Stay Period expires on May 31, 2024, which the Monitor seeks to extend up to and including September 6, 2024, in anticipation that within that time:
 - (a) the new building permit will have been issued; and

- (b) the Monitor will have had an opportunity to advance discussions with stakeholders regarding the initiation of the Sale Process.

Part 3: LEGAL BASIS

EXTENSION OF THE STAY PERIOD

1. The Monitor relies on sections 11 and 11.02, of the CCAA and the inherent jurisdiction and statutory discretion of this Honourable Court.
2. Subsection 11.02(2) of the CCAA provides that a debtor company may apply for an extension of the stay of proceedings for a period of time that the court considers necessary on any terms that it may impose. Subsection 11.02(3) of the CCAA provides that the court shall not make an order extending the stay period unless it is satisfied that: (a) the circumstances exist that make the order appropriate; and (b) the debtor company has acted and is acting in good faith and with due diligence.
3. The Monitor seeks to extend the Stay Period until 11:59 p.m. on September 6, 2024.
4. The Monitor recommends that this Court grant the extension being sought, including for the following reasons:
 - (a) more time is needed to obtain the building permit and, subsequently, initiate the Sale Process;
 - (b) Romspen has consented to an extension of the Stay Period;
 - (c) the Petitioners have been, and are, acting in good faith and with due diligence; and
 - (d) no creditor of the Companies will be materially prejudiced by the extension of the Stay Period being sought.

ADDITIONAL INTERIM FINANCING

5. The Court's jurisdiction under section 11.2 of the CCAA to approve debtor-in-possession financing and grant a corresponding charge also authorizes it to "approve amendments to a DIP agreement and secure all obligations arising from the amended DIP loans with an

increased DIP charge". When doing so, a court must be satisfied that the requirements of subsection 11.2(4) of the CCAA support the relief sought.

Lydian International Limited (Re), 2020 ONSC 4006 at para 66.

6. Section 11.2(4) of the CCAA reads, in part, as follows:

11.2 (4) In deciding whether to make an order, the court is to consider, among other things,

- (a) the period during which the company is expected to be subject to proceedings under this Act;
- (b) how the company's business and financial affairs are to be managed during the proceedings;
- (c) whether the company's management has the confidence of its major creditors;
- (d) whether the loan would enhance the prospects of a viable compromise or arrangement being made in respect of the company;
- (e) the nature and value of the company's property;
- (f) whether any creditor would be materially prejudiced as a result of the security or charge; and
- (g) the monitor's report referred to in paragraph 23(1)(b), if any.

7. No one factor is determinative. Rather, courts are to balance the interests of the debtor and its stakeholders with a view to ensuring that the financing "will assist the debtor company to obtain the 'breathing room' said to be needed to hopefully achieve a restructuring acceptable to the creditors and the court".

1057863 B.C. Ltd (Re), 2020 BCSC 1359 at para 35.

8. Having regard to the factors enumerated in subsection 11.2(4) of the CCAA, the Additional DIP Financing and the corresponding increase in the Romspen Interim Financing Charge #2 are necessary and appropriate given, among other things, that:

- (a) the additional funding to be advanced is required to ensure that there is sufficient liquidity to continue to advance these CCAA proceedings;
- (b) the Additional Dip Financing and the corresponding increase in the Romspen Interim Financing Charge #2 are in the best interests of all stakeholders as, in the view of the Monitor, it is necessary to protect the realizable value of the Development Property;
- (c) no creditor will be materially prejudiced by the proposed Additional DIP Financing or the increase in the Romspen Interim Financing Charge #2;

- (d) Romspen, the Companies' senior secured creditor, is supportive and has agreed to provide the Additional DIP Financing; and
- (e) the Monitor is of the view that the Additional DIP Financing and the increase in the Romspen Interim Financing Charge #2 are reasonable and warranted in the circumstances.

Part 4: MATERIAL TO BE RELIED ON

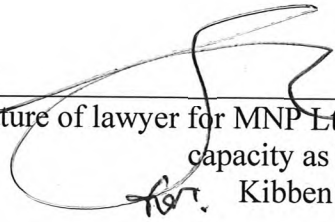
1. Monitor's Eleventh Report to Court dated November 21, 2023;
2. Monitor's Twelfth Report to Court dated February 21, 2024;
3. Monitor's Thirteenth Report to Court dated May 28, 2024;
4. Such further and other materials as counsel may advise and as this Court deems admissible.

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: November 23, 2023



 Signature of lawyer for MNP Ltd., in its
 capacity as Monitor
 for Kibben Jackson

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 Associate Judge

The Solicitors for the Monitor are Fasken Martineau DuMoulin LLP, whose office address and address for delivery is 550 Burrard Street, Suite 2900, Vancouver, BC V6C 0A3 Telephone: +1 604 631 3131 Facsimile: +1 604 631 3232. (Reference: Kibben Jackson/265884.00015)

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 matter 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"

SERVICE LIST

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
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AND

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF
0989705 B.C. LTD., ALDERBRIDGE WAY GP LTD., and
ALDERBRIDGE WAY LIMITED PARTNERSHIP

PETITIONERS

SERVICE LIST

As at August 2, 2023

Name of Counsel:	Name of Parties:
<p>Dentons Canada LLP Barristers & Solicitors 20th Floor – 250 Howe Street Vancouver, BC V6C 3R8</p> <p>Attention: John Sandrelli Valerie Cross Emma Newbery Avic Arenas</p> <p>E-mail: john.sandrelli@dentons.com valerie.cross@dentons.com emma.newbery@dentons.com avic.arenas@dentons.com</p> <p>Tel: (604) 687-4460 Fax : (604) 683-5214</p>	<p><i>0989705 B.C. Ltd., Alderbridge Way Limited Partnership and Alderbridge Way GP Ltd.</i></p>

Name of Counsel:	Name of Parties:
<p>Fasken Martineau DuMoulin LLP 550 Burrard St #2900, Vancouver, BC V6C 0A3</p> <p>Attention: Kibben Jackson Mishaal Gill</p> <p>Email: kjackson@fasken.com mgill@fasken.com svolkow@fasken.com</p> <p>Tel. : 1 604 631 4786</p>	<p><i>Monitor of 0989705 B.C. Ltd., Alderbridge Way Limited Partnership and Alderbridge Way GP Ltd.</i></p>
<p>The Bowra Group Inc. 430 – 505 Burrard Street Vancouver, BC V7X 1M3</p> <p>Attention: Mario Mainella Kevin Koo</p> <p>Email: mario.mainella@mnp.ca kevin.koo@mnp.ca</p> <p>Tel: 604 689 8939</p>	<p><i>Monitor of 0989705 B.C. Ltd., Alderbridge Way Limited Partnership and Alderbridge Way GP Ltd.</i></p>
<p>Blake, Cassels & Graydon LLP 595 Burrard Street, Suite 2600, Vancouver BC V7X 1L3</p> <p>Attention: Peter Rubin</p> <p>Email: peter.rubin@blakes.com greg.umbach@blakes.com peter.bychawski@blakes.com claire.hildebrand@blakes.com</p> <p>Tel: 604-631-3300 Fax: 604-631-3309</p>	<p><i>Romspen Investment Corporation</i></p>
<p>Romspen Investment Corporation 162 Cumberland Street, Suite 300 Toronto, Ontario M5R 3N5</p> <p>Attention: Blake Cassidy Wes Roitman</p> <p>Email: BlakeCassidy@romspen.com wes@romspen.com</p> <p>Tel: 416.928.4868 Fax: 416.928.3848</p>	<p><i>Romspen Investment Corporation</i></p>

Name of Counsel:	Name of Parties:
<p>Miller Thomson LLP 40 King Street West, Suite 5800 P.O. Box 1011 Toronto, Ontario M5H 3S1</p> <p>Attention: Asim Iqbal Gavin Finlayson Bryan Hicks</p> <p>E-mail: aiqbal@millerthomson.com gfinlayson@millerthomson.com bjhicks@millerthomson.com</p> <p>Tel : 416.597.6008</p>	<p><i>CIBT Education Group Inc., GEC Education City (Richmond) Limited Partnership and GEC (Richmond) GP Inc.</i></p>
<p>Harper Grey LLP Barristers & Solicitors 3200 – 650 West Georgia Street Vancouver, BC, V6B 4P7</p> <p>Attention: John Sullivan and Salman Bhura</p> <p>Email: jsullivan@harpergrey.com sbhura@harpergrey.com</p> <p>Tel: 604 687 0411</p>	<p><i>CIBT Education Group Inc., GEC Education City (Richmond) Limited Partnership and GEC (Richmond) GP Inc.</i></p>
<p>KPMG 777 Dunsmuir Street, 11th Floor Vancouver, BC, V7Y 1K3</p> <p>Attention: Huey Lee and Michelle Wang</p> <p>Email: hueylee@kpmg.ca mmwang@kpmg.ca</p> <p>Tel: 604 691 3000</p>	<p><i>Advisor to CIBT Education Group Inc., GEC Education City (Richmond) Limited Partnership and GEC (Richmond) GP Inc.</i></p>
<p>Cassels Brock & Blackwell LLP 2200 – 885 West Georgia Street Vancouver, BC V6E 3C8</p> <p>Attention: Vicki Tickle</p> <p>Email: vtickle@cassels.com jenns@cassels.com hroberts@cassels.com</p> <p>Tel: 604 691 6120</p>	<p><i>R. Jay Management Ltd. and MNB Enterprises Inc.</i></p>

Name of Counsel:	Name of Parties:
<p>Digby Leigh & Co. 201 - 3053 Edgemont Blvd., North Vancouver, BC V7R 2N5</p> <p>Attention: Digby Leigh</p> <p>Email: dleigh@leighco.ca vchen@leighco.ca</p> <p>Tel : 604-984-3394</p>	<p><i>MNB Enterprises Inc.</i></p>
<p>Bennett Jones 4500 Bankers Hall East 855 2nd Street SW Calgary, AB T2P 4K7</p> <p>Attention: Kelsey Meyer Onna Kathler Adam Williams Kelsey Meyer</p> <p>Email: meyerk@bennettjones.com kathlerd@bennettjones.com williamsa@bennettjones.com meyerk@bennettjones.com</p> <p>Tel: 403.298.4485</p>	<p><i>JV Driver Investments Inc.</i></p>
<p>JV Driver International 1458-409 Granville Street Vancouver, B.C. V6C 1T2</p> <p>Attention: Michael Weber Tamara Middleton Greg Pratch</p> <p>Email: mweber@jvdriver.com tmiddleton@jvdriver.com gpratch@jvdriver.com</p> <p>Tel: 604-349-2011</p>	<p><i>JV Driver International, J.V. Driver Inc. And 1185678 B.C. Ltd.</i></p>
<p>McCarthy Tetrault LLP 745 Thurlow St Suite 2400, Vancouver, BC V6E 0C5</p> <p>Attention: Lance Williams</p> <p>Email: lwilliams@mccarthy.ca sdanielisz@mccarthy.ca</p> <p>Tel: 604-643-7154</p>	<p><i>Metro-Can Construction (AT) Ltd., Keller Foundations Ltd., Rush Contracting Ltd. and Storm Guard Water Treatment Inc.</i></p>

Name of Counsel:	Name of Parties:
<p>McLean & Armstrong LLP 300 – 1497 Marine Drive, West Vancouver, BC, V7T 1B8</p> <p>Attention: Chris Moore</p> <p>Email: cmoore@mcleanarmstrong.com</p> <p>Tel: 604 925 0672</p>	<p><i>Metro-Can Construction (AT) Ltd.</i></p>
<p>Deputy Attorney General British Columbia Regional Office Department of Justice Canada National Litigation Sector 900 - 840 Howe Street Vancouver, BC V6Z 2S9</p> <p>Attention: Jason Levine</p> <p>E-mail: jason.levine@justice.gc.ca</p> <p>Tel.: (604) 666-0632 Fax: (604) 666-1462</p>	<p><i>Her Majesty The Queen in Right of Canada</i></p>
<p>Clark Wilson LLP 900 – 885 West Georgia Street Vancouver, BC V6C 3H1</p> <p>Attention: Chris Ramsay Katie Mak</p> <p>Email: cramsay@cwilson.com kmak@cwilson.com jlanda@cwilson.co@cwilson.com</p> <p>Tel: 604 687 5700</p>	<p><i>City of Richmond</i></p>
<p>City of Richmond</p> <p>Attention: Lisa Hobman</p> <p>Email: lhobman@richmond.ca</p>	<p><i>City of Richmond</i></p>
<p>Avison Young 1920 McKinney Avenue, Suite 1100 Dallas, TX 75201</p> <p>Attention: Tracy Allen</p> <p>Email: tracy.allen@avisonyoung.com</p>	<p><i>Avison Young</i></p>
<p>DLA Piper 2800 – 666 Burrard Street Vancouver, BC V6C 2Z7</p> <p>Attention: Colin Brousson</p> <p>Email: colin.brousson@dlapiper.com</p> <p>Tel: 604 643 6400</p>	<p><i>Gryphon Living</i></p>

Name of Counsel:	Name of Parties:
Robert A. Millar LC Email: rmillarlc@gmail.com Tel: 604-506-3332	<i>Wesgroup</i>
Canada Revenue Agency 9737 King George Boulevard Surrey, BC V3T 5W6 Vancouver, BC V6Z 2S9 Attention: K. Fuller Tel.: (236) 334-3246 Fax: (604) 658-2700	<i>Canada Revenue Agency</i>

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SCHEDULE "B"

DRAFT ORDER

IN THE SUPREME COURT OF BRITISH COLUMBIA

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

AND

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF
0989705 B.C. LTD., ALDERBRIDGE WAY GP LTD., and
ALDERBRIDGE WAY LIMITED PARTNERSHIP

PETITIONERS

ORDER MADE AFTER APPLICATION
(STAY EXTENSION AND INTERIM FINANCING ORDER)

BEFORE)
) THE HONOURABLE)
) MADAM JUSTICE FITZPATRICK) May 31, 2024
)
)

ON THE APPLICATION OF MNP Ltd. (formerly The Bowra Group Inc.) (the “**Monitor**”) in its capacity as Monitor of Alderbridge Way GP Ltd., Alderbridge Way Limited Partnership and 0989705 B.C. Ltd. (collectively the “**Companies**”) coming on for hearing at Vancouver, British Columbia on this date; AND ON HEARING Mishaal Gill, counsel for the Monitor, and those other counsel listed in Schedule “A” hereto; AND UPON READING the materials filed, including the Monitor’s Thirteenth Report to Court, dated May [●], 2024; AND PURSUANT to the *Companies’ Creditors Arrangement Act*, R.S.C. 1985 c. C-36, as amended (the “**CCAA**”) and the inherent jurisdiction of this Honourable Court;

THIS COURT ORDERS AND DECLARES THAT:

1. The time for service of the Monitor’s Notice of Application dated May [●], 2024, is abridged such that it is properly returnable today.

2. All capitalized terms not otherwise defined have the meanings ascribed to them in the Second Amended and Restated Initial Order of this court made herein on August 11, 2022 (the "**SARIO**").

STAY PERIOD EXTENSION

3. All relief granted under the SARIO, including the Stay Period provided for in paragraph 18 therein, is hereby extended until September 6, 2024.

INCREASE IN INTERIM FINANCING

4. Paragraph 44 of the SARIO, as amended by the orders of this court made February 23, 2024, is hereby further amended so as to read as follows:

44. The Monitor, on behalf of the Petitioners, is hereby authorized and empowered to obtain and borrow under an additional credit facility from the Romspen Interim Lender in order to finance the continuation of the Business and preservation of the Property, provided that borrowings under such credit facility shall not exceed \$6.9 million unless permitted by further Order of this Court.

PRIORITY OF CHARGES

5. Paragraph 50 of the SARIO is hereby amended so as to read as follows:

50. The priorities of the Administration Charge, the security interests registered with respect to the security of Romspen (the "**Romspen Security**"), the Romspen Interim Financing Charge #1, the Romspen Interim Financing Charge #2, the Interim Financing Charge, the Directors' Charge and the GBL Charge, as among them, shall be as follows:

First – Administration Charge (to the maximum amount of \$300,000);

Second – Directors' Charge (to a maximum amount of \$75,000);

Third – the GBL Charge (to a maximum amount of \$250,000);

Fourth - the Romspen Interim Financing Charge #2 (to a maximum principal amount of \$6,900,000);

Fifth - the Romspen Security;

Sixth - ranking *parri passu*, the Interim Financing Charge (to a maximum principal amount of \$850,000) and the Romspen Interim Financing Charge #1 (to a maximum principal amount of \$1,650,000).

6. Endorsement of this order by counsel appearing on this application, other than counsel for the Monitor, 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 Mishaal Gill
Lawyer for the Monitor

BY THE COURT

REGISTRAR

SCHEDULE "A"

Counsel Appearing

Name of Party	Counsel Name
0989705 B.C. LTD., Alderbridge Way GP Ltd. and Alderbridge Way Limited Partnership <i>Petitioners</i>	Valerie Cross
MNP Ltd. <i>Monitor</i>	Mishaal Gill
Romspen Investment Corporation <i>Senior Secured Creditor</i>	Peter Rubin Peter Bychawski
CIBT Education Group Inc., GEC Education City (Richmond) Limited Partnership and GEC (Richmond) GP Inc.	Salman Bhura John Sullivan

No. S-222758
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

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PETITIONERS

**ORDER MADE AFTER APPLICATION
(STAY EXTENSION AND INTERIM FINANCING)**

FASKEN MARTINEAU DuMOULIN LLP

Barristers and Solicitors
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+1 604 631 3131

Counsel: Mishaal Gill
Matter No: 265884.00015