



No. S-235026
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

AND

IN THE MATTER OF THE CANADA BUSINESS CORPORATIONS ACT,
R.S.C. 1985, c. C-44 and THE BUSINESS CORPORATIONS ACT, S.B.C. 2002, c. 57

AND

IN THE MATTER OF THE JOSEPH RICHARD HOSPITALITY GROUP LTD.
AND THOSE PARTIES LISTED ON SCHEDULE "A"

PETITIONERS

NOTICE OF APPLICATION

Name of applicant: MNP Ltd., in its capacity as the court-appointed
monitor of the Petitioners (the "Monitor")

TO: Service List, attached hereto as **Schedule "B"**

TAKE NOTICE that an application will be made by the Monitor to the Honourable Madam Justice Fitzpatrick at the courthouse at 800 Smithe Street, Vancouver, British Columbia on **Monday, August 26, 2024 at 10:00 a.m.** for the orders set out in Part 1 below.

The applicant estimates that the application will take one hour.

- This matter is within the jurisdiction of an associate judge.
- This matter is not within the jurisdiction of an associate judge. Justice Fitzpatrick is seized of these proceedings.

PART 1: ORDER(S) SOUGHT

1. An order substantially in the form attached hereto as **Schedule "C"** extending the stay of proceedings (the "**Stay**") granted in these proceedings (these "**CCAA Proceedings**") to November 1, 2024 (the "**Stay Extension**").

PART 2: FACTUAL BASIS

a. Background

1. The Petitioners operate a series of restaurants, pubs, liquor stores, events and hospitality businesses, and wineries in the Lower Mainland. Collectively, they are known as the “Joseph Richard Group”.
2. The Petitioners’ financial challenges were primarily a result of COVID-19’s negative toll on the hospitality industry, compounded by debt accumulated to weather the pandemic. This led the Petitioners to seek protection under the *Companies’ Creditors Arrangement Act*, RSC 1985, c C-36 (the “**CCAA**”).
3. Pursuant to an order of this Court made on July 17, 2023 (the “**Initial Order**”), the Petitioners were granted protection under the CCAA. At that time, Ernst & Young Inc. (“**EY**”) was appointed monitor of the Petitioners.
4. The Court has subsequently made various orders in these CCAA proceedings, including:
 - (a) amending and restating the Initial Order (the “**ARIO**”) on July 27, 2023; and
 - (b) approving interim financing from Canadian Western Bank (in such capacity, the “**Interim Lender**”) on August 30, 2023.
5. On May 9, 2024, this Court granted an order that, among other things (the “**Substitution Order**”):
 - (a) extended the stay of proceedings up to and including August 30, 2024;
 - (b) substituted MNP Ltd. as court-appointed monitor with enhanced powers of the Petitioners and discharging EY as monitor;
 - (c) granted the Monitor and its counsel the benefit of a charge not exceeding \$250,000 as security for their respective fees and disbursements (the “**New Administration Charge**”) on the Petitioners’ current and future assets, undertakings and properties of every nature and kind whatsoever, and wherever situate including all proceeds thereof (the “**Property**”); and

- (d) reinstated and increased the interim financing facility from the Interim Lender up to the maximum principal amount of \$750,000.

Substitution Order at paras 3 - 18

6. In addition to the Substitution Order, this Court granted an order on May 9, 2024 that, among other things, authorized and directed the Monitor to implement the Sales Process (the "**Sales Process Order**"). The purpose of the Sales Process is to solicit offers for the Petitioners' operating locations.

Sales Process Order at para 2 and Schedule "C"
First Report of the Proposed Monitor, dated May 8, 2024
(the "**First Monitor Report**") at para 11

7. One June 7, 2024, this Court approved the engagement of MNP Corporate Finance Inc. ("**MNPCF**") to assist with the implementation of the Sales Process ("**Sales Agent Order**").

Sales Agent Order at para 2

b. Stay Extension to Complete the Sales Process

8. The Sales Process was commenced mid-May 2024. Since then, the Monitor has been actively engaged in marketing the Petitioners' assets and negotiating with potential buyers.

Monitor's Third Report to the Court, dated August 21, 2024
(the "**Third Monitor Report**") at para 12

9. The Sales Process requires the Monitor, in consultation with the Petitioners and the Interim Lender, to identify the highest or otherwise best qualified bid, and back up bid, received for each or any combination of the Petitioners' locations or assets.

First Monitor Report at paras 13 and 14

10. The deadline for interested parties to submit a bid on some or all of the Petitioners' assets was August 1, 2024. The Monitor received a number of bids. The Monitor is currently reviewing the bids, with assistance from MNPCF and the Interim Lender, and, subject to entering into a final agreement with a purchaser, the Monitor will apply to this Court for the approval of the successful bid(s).

Third Monitor Report at paras 13-14

11. The Monitor is requesting the Stay Extension to complete this Sale Process and hopefully return to apply for approval of any successful bids and to distribute any proceeds.

Third Monitor Report at para 15

PART 3: LEGAL BASIS

c. This Court has the Jurisdiction to Grant the Stay Extension

12. The Petitioners seek the Stay Extension to and including November 1, 2024
13. Subsection 11.02(2) of the CCAA grants this Court the discretion to grant a stay extension for a period that this Court considers necessary on any terms that this Court may impose. However, subsection 11.02(3) of the CCAA further provides that this Court cannot exercise its discretion to grant the Stay Extension unless it is satisfied that:
- (a) the Stay Extension is appropriate in the circumstances; and
 - (b) the Petitioners have acted and continue to act in good faith and with due diligence.

CCAA, ss 11.02(2), (3)

Worldspan Marine Inc, Re, 2011 BCSC 1758 at para 12 [**Worldspan**]

d. The Stay Extension is appropriate in the circumstances

14. In assessing whether the Stay Extension is appropriate in the circumstances, this Court ought to inquire whether the extension advances the remedial purpose of the CCAA.

Century Services Inc. v Canada (Attorney General), 2010 SCC 60
at para 70 [**Century Services**]

Worldspan at para 13

15. The Supreme Court of Canada has held that the purpose of the CCAA is “to facilitate the survival of going concerns” by “permit[ing] the debtor to continue to carry on business and, where possible, avoid the social and economic costs of liquidating its assets.”

Century Services at para 15

Canada v Canada North Group Inc., 2021 SCC 30 at para 21 [**Canada North**]

16. A stay of proceedings helps achieve this purpose by preserving the *status quo* for the debtor company, facilitating the ongoing operations of the debtor company's business, preserving the value of the business, and providing the debtor company with the necessary time, flexibility, and 'breathing room' to carry out a supervised restructuring or organised sale process.

Canada North at para 19;

Lehndorff General Partners Ltd., Re, (1993), 9 BLR (2d) 275,
17 CBR (3d) 24 (Ont Gen Div) at paras 5-7

North American Tungsten Corporation Ltd. (Re), 2015 BCSC 1376 at para 25

Timminco Limited (Re), 2012 ONSC 2515 at para 15

17. The CCAA is a flexible instrument and debtor companies are entitled to seek protection in the context of a wide range of restructuring options.

Canada North at para 138;

Century Services at para 57, citing *Metcalfe & Mansfield Alternative Investments II Corp., (Re)*, 2008 ONCA 587 at para 44

18. The Petitioners require the Stay Extension to preserve the *status quo* while concluding the Sales Process. A two-month Stay Extension until November 1, 2024 is appropriate to allow adequate time for the Monitor to review the bids received by the bid deadline, prepare materials to return to this Court for approval of any successful bid(s), and apply for the distribution of any sale proceeds. All of the above are important steps in the restructuring of the Petitioners' business, to the benefit of the stakeholders and, therefore, the Stay Extension is appropriate in the circumstances to maintain the *status quo* while those processes proceed.

Third Monitor's Report at para 15

e. The Petitioners have been acting in good faith and with due diligence

19. The Petitioners have been working in good faith and with due diligence to advance this CCAA Proceeding.

Third Monitor's Report at para 24

20. As noted above, since the last extension of the Stay, the Petitioners have continued to advance the restructuring, including by conducting the Sales Process.

Third Monitor's Report at para 24

21. The Petitioners have sufficient liquidity to meet their obligations during the Stay Extension.

Third Monitor's Report at para 27

22. Accordingly, this Court ought to approve the Stay Extension.

PART 4: MATERIAL TO BE RELIED ON

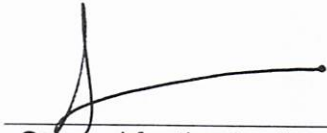
1. First Report of the Monitor, MNP Ltd., dated May 8, 2024;
2. Third Report of the Monitor, MNP Ltd., dated August 21, 2024;
3. Order of Madam Justice Fitzpatrick (Amended and Restated Initial Order), made July 27, 2023;
4. Order of Madam Justice Fitzpatrick (re Substitution of Monitor, Increased Interim Financing and Stay Extension to August 30, 2024), made May 9, 2024;
5. Order of Madam Justice Fitzpatrick (re Sale Process), made May 9, 2024;
6. Order of Madam Justice Fitzpatrick (re Sales Agent), made June 7, 2024; and
7. Such further and other materials as counsel may advise and this Court may permit.

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; and
- (iii) if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7(9).

DATE: August 21, 2024



Counsel for the Applicant, MNP Ltd.
McCarthy Tétrault LLP
(Lance Williams and Ashley Bowron)

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

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
- none of the above

SCHEDULE "A"

LIST OF PETITIONERS

1138279 B.C. Ltd.
1164312 B.C. Ltd.
Ad Prolem Capital Investments Ltd.
Clover 67 Private Dining Room Ltd.
Edith & Arthur Public House Ltd.
Joseph Bourque Investments Ltd.
Joseph Richard Hospitality Group Ltd.
Joseph Richard Investments Ltd
Joseph Richard IP Holdings Ltd.
Joseph Richard Management Ltd.
JRG Canteen Virtual Kitchen Ltd.
JRG Clover Station LRS Ltd.
JRG Cloverdale Holdings Ltd.
JRG Cloverdale Ventures Ltd.
JRG Foodhall (Vancouver) Ventures Ltd.
JRG Glass House Estates Winery Ltd.
JRG Ledgeview Holdings Ltd.
JRG Steveston Hotels Ltd.
JRG Systems Ltd.
JRG Whiskey Charlie Cafe, Pitt Meadows Ltd.

Livelyhood Public House Ltd.
Micky's Investments (Coquitlam) Ltd.
Monkey See Tiki Bar Ltd.
Oak & Thorne Public House Ltd.
Oceanside Yacht Club And Public House Ltd.
S & L Kitchen & Bar Holdings Abbotsford Ltd.
S & L Kitchen & Bar Holdings Langley Ltd.
S & L Kitchen & Bar Holdings South Surrey Ltd.
Steveston Hospitality Services Ltd.
Sudo Asian Kitchen Holdings (Langley) Ltd.
The Italian Osteria and Cheese Bar Ltd.
The Phat Bird Public House Ltd.
The Study Public House Ltd.
Townhall Holdings (Abbotsford) Ltd.
Townhall Holdings (Chilliwack) Ltd.
Townhall Holdings (Coquitlam) Ltd.
Townhall Holdings (Maple Ridge) Ltd.
Townhall Holdings (South Surrey) Ltd.
Townhall Holdings Ltd.
Whiskey Charlie Holdings Ltd.

Non-Petitioner Entities:

Blank Canvas Catering Ltd.
JRG Queens LRS Ventures Ltd.
JRG Chilliwack Holdings Ltd.
JRG Growth Ventures Ltd.
JRG Published Holdings Ltd.
JRG Whip Holdings Ltd.

SCHEDULE "B"

NO. S-235026
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

AND

IN THE MATTER OF THE CANADA BUSINESS CORPORATIONS ACT, R.S.C. 1985,
c. C-44, THE BUSINESS CORPORATIONS ACT, S.B.C. 2002, c.57

AND

IN THE MATTER OF THE JOSEPH RICHARD HOSPITALITY GROUP LTD.
AND THOSE PARTIES LISTED ON SCHEDULE "A"

PETITIONERS

SERVICE LIST
(as at August 21, 2024)

<p>Farris LLP 25th Floor – 700 West Georgia Street Vancouver, BC V7Y 1B3</p> <p>Attention: Rebecca Morse Tevia Jeffries</p> <p>Email: rmorse@farris.com tjeffries@farris.com slun@farris.com dboere@farris.com lferguson@farris.com smacallister@farris.com</p> <p>Counsel for Joseph Richard Hospitality Group Ltd. et al, Petitioners</p>	<p>MNP Ltd. Suite 1630, 609 Granville Street Vancouver, BC V7Y 1E7</p> <p>Attention: Mario Mainella Kevin Koo</p> <p>Email: Mario.Mainella@mnp.ca Kevin.Koo@mnp.ca</p> <p>Monitor</p> <p>McCarthy Tétrault LLP Suite 2400, 745 Thurlow Street Vancouver, BC V6E 0C5</p> <p>Attention: H. Lance Williams Ashley Bowron Angelica Kovac</p> <p>Email: lwilliams@mccarthy.ca abowron@mccarthy.ca akovac@mccarthy.ca sdanielisz@mccarthy.ca</p> <p>Counsel for the Monitor, MNP Ltd.</p>
---	--

<p>Lawson Lundell LLP Suite 1600, 925 West Georgia Street Vancouver, BC V6C 3L2</p> <p>Attention: William L. Roberts Noor Mann Kimia Jalilvand</p> <p>Email: wroberts@lawsonlundell.com kjalilvand@lawsonlundell.com nmann@lawsonlundell.com</p> <p>Counsel for The Bank of Montreal</p>	<p>Fasken Martineau DuMoulin LLP 550 Burrard Street, Suite 2900 Vancouver, BC V6C 0A3</p> <p>Attention: Lisa Heibert Kibben Jackson Mishaal Gill</p> <p>Email: lhiebert@fasken.com mqill@fasken.com svolkow@fasken.com kjackson@fasken.com</p> <p>Counsel for Canadian Western Bank</p>
<p>Deputy Attorney General of Canada British Columbia Regional Office Department of Justice Canada 900 – 840 Howe Street Vancouver, BC V6Z 2S9</p> <p>Attention: Yianni Pappas-Acreman Angela Lam</p> <p>Email: Yianni.Pappas-Acreman@justice.gc.ca Angela.Lam@justice.gc.ca agc_pgc_vancouver@justice.gc.ca</p> <p>Counsel for His Majesty the King in right of Canada</p>	<p>Ministry of Attorney General Legal Services Branch PO Box 9280 Stn Prov Gov't Victoria, BC V8W 9J7</p> <p>Email: Aaron.Welch@gov.bc.ca AGLSBRevTaxInsolvency@gov.bc.ca</p> <p>Counsel for His Majesty the King in right of the Province of British Columbia</p>
<p>Alliance Lawyers 103 – 20316 56th Avenue Langley, BC V3A 3Y7</p> <p>Attention: Aman Oberoi Vickram Sidhu</p> <p>Email: aman@alliancelawyers.ca vickram@alliancelawyers.ca</p> <p>Counsel for 0911110 B.C. Ltd.</p>	<p>Burns Fitzpatrick LLP Suite 400, 570 Granville Street Vancouver, BC V6C 3P1</p> <p>Attention: Dennis Fitzpatrick Leah Jonak</p> <p>Email: dfitzpatrick@burnsfitz.com ljonak@burnsfitz.com</p> <p>Counsel for Ledgeview Golf & Country Club</p>

<p>DLA Piper (Canada) LLP Suite 2700 - 1133 Melville Street Vancouver, BC V6E 4E5</p> <p>Attention: Michael E. Reid</p> <p>Email: michael.reid@ca.dlapiper.com</p> <p>Counsel for Eclipse Creations Contracting Ltd.</p>	<p>Burns Fitzpatrick LLP Suite 400, 570 Granville Street Vancouver, BC V6C 3P1</p> <p>Attention: Dennis Fitzpatrick</p> <p>Email: dfitzpatrick@burnsfitz.com lionak@burnsfitz.com</p> <p>Counsel for Ledgeview Golf & Country Club</p>
<p>Gowling WLG (Canada) LLP Suite 2300, 550 Burrard Street Vancouver, BC V6C 2B5</p> <p>Attention: Jonathan Ross Lorne Segal</p> <p>Email: Jonathan.ross@gowlingwlg.com Lorne.segal@gowlingwlg.com Michele.hay@gowlingwlg.com</p> <p>Counsel for Sysco Corporation</p>	<p>Nied Law Corporation Suite 600, 777 Hornby Street Vancouver, BC V6Z 1S4</p> <p>Attention: Matthew Nied</p> <p>Email: matthew@niedlaw.com</p> <p>Counsel for Titan International Business Inc.</p>
<p>Camelino Galessiere LLP 65 Queen St West, Suite 440 Toronto, ON M5H 2M5</p> <p>Attention: Linda Galessiere</p> <p>Email: lgalessiere@cqlegal.ca</p> <p>Counsel for RioCan</p>	<p>Richards Buell Sutton 700 – 401 West Georgia Street Vancouver, BC V6B 5A1</p> <p>Attention: Ryan Shaw</p> <p>Email: rshaw@rbs.ca</p> <p>Counsel for Rieding Projects Ltd., Arbutus Capital Leasing Ltd.</p>

<p>One West Auto Ltd. dba Vancouver Mitsubishi</p> <p>1885 Clark Drive Vancouver, BC V5N 3G5</p>	<p>BMW Canada Inc.</p> <p>50 Ultimate Drive Richmond Hill, ON L4S 0C8</p>
<p>Preston Auto Lease Ltd.</p> <p>19990 Langley Bypass Langley, BC V3A 4Y1</p>	<p>One West Leasing Ltd.</p> <p>1885 Clark Drive Vancouver, BC V5N 3G5</p>

<p>Royal Bank of Canada</p> <p>626 Sixth Avenue, 2nd Floor New Westminster, BC V3M 6Z2</p>	<p>Royal Bank of Canada</p> <p>32nd Floor, 1055 West Georgia Street Vancouver, BC V6E 3N5</p>
<p>Prospera Credit Union</p> <p>#500 – 6339 200th Street Langley, BC V2Y 1A2</p>	<p>True Grit Farms</p> <p>Attention: Gonzalo Naranjo</p> <p>Email: gonzalo@truegritfarms.com</p>
<p>Bodkin, A Division of Bennington Financial Corp.</p> <p>102 – 1465 North Service Rd. E Oakville, ON L6H 1A7</p>	<p>Connect First Credit Union Ltd.</p> <p>200, 2850 Sunridge Blvd NE Calgary, AB T1Y 6G2</p>
<p>BRP Investment Limited</p> <p>Brad Martyniuk</p> <p>Email: bradmartyniuk@telus.net</p>	<p>Xerox Canada Ltd.</p> <p>#500 20 York Mills Rd, Box 700 Toronto, ON M2P 2C2</p>
<p>Universal Packaging</p> <p>Becky Hughes</p> <p>becky@thinkuniversal.com</p>	<p>Universe Projects Ltd.</p> <p>Attention: Wolfgang Meyer</p> <p>Email: wolfgang23490@gmail.com</p>
<p>Uniwest Projects</p> <p>Attention: Robin Maggs</p> <p>Email: homestarholdings196@gmail.com</p>	<p>Elite Print Services</p> <p>Attention: Rob Field</p> <p>Email: rob@eliteprintservices.ca</p>
<p>Derek Wynne</p> <p>Email: derekwynne@shaw.ca</p>	<p>Propane Depot</p> <p>Attention: Sarena Hansel</p> <p>Email: sarena@propanedepot.ca</p>
<p>Bennington Financial Corp.</p> <p>Attention: Shannon Dickson</p> <p>Email: shannond@benningtonfinancial.ca</p>	<p>Elite Print Services Ltd.</p> <p>Attention: Lana Field</p> <p>Email: accounting@eliteprintservices.ca</p>

Hamilton Duncan Law Corporation

Attention: Janna Freeman

Email: jfreeman@hamiltonduncan.com
rogers@hamiltonduncan.com
alaluk@hamiltonduncan.com
gpalm@hamiltonduncan.com

SERVICE LIST EMAILS
(as at August 21, 2024)

rmorse@farris.com; tjeffries@farris.com; slun@farris.com; dboere@farris.com;
lferguson@farris.com; smacallister@farris.com; mario.mainella@mnp.ca; kevin.koo@mnp.ca;
lwilliams@mccarthy.ca; abowron@mccarthy.ca; akovac@mccarthy.ca; sdanielisz@mccarthy.ca;
wroberts@lawsonlundell.com; kjalilvand@lawsonlundell.com; nmann@lawsonlundell.com;
lhiebert@fasken.com; mgill@fasken.com; svolkow@fasken.com; kjackson@fasken.com;
Aaron.Welch@gov.bc.ca; AGLSBRevTaxInsolvency@gov.bc.ca; Yianni.Pappas-Acreman@justice.gc.ca; agc_pgc_vancouver@justice.gc.ca; Angela.Lam@justice.gc.ca;
rshaw@rbs.ca; aman@alliancelawyers.ca; vickram@alliancelawyers.ca; bradmartyniuk@telus.net;
lgalessiere@cglegal.ca; becky@thinkuniversal.com; dfitzpatrick@burnsfitz.com;
ljonak@burnsfitz.com; matthew@niedlaw.com; Jonathan.ross@gowlingwlq.com;
Lorne.segal@gowlingwlq.com; Michele.hay@gowlingwlq.com; homestarholdings196@gmail.com;
wolfgang23490@gmail.com; derekwynne@shaw.ca; michael.reid@ca.dlapiper.com;
shannond@benningtonfinancial.ca; sarena@propanedepot.ca; gonzalo@truegritfarms.com;
accounting@eliteprintservices.ca; jfreeman@hamiltonduncan.com; rrogers@hamiltonduncan.com;
alaluk@hamiltonduncan.com; gpalm@hamiltonduncan.com; rob@eliteprintservices.ca;

SCHEDULE "C"

No. S235026
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

AND

IN THE MATTER OF THE CANADA BUSINESS CORPORATIONS ACT, R.S.C. 1985, c. C-44,
and THE BUSINESS CORPORATIONS ACT, S.B.C. 2002, c. 57,

AND

IN THE MATTER OF THE JOSEPH RICHARD HOSPITALITY GROUP LTD.
AND THOSE PARTIES LISTED ON SCHEDULE "A"

PETITIONERS

ORDER MADE AFTER APPLICATION

(Re: Stay Extension)

BEFORE THE HONOURABLE

)

MONDAY, THE 26TH DAY

MADAM JUSTICE FITZPATRICK

)

OF AUGUST, 2024

)

ON THE APPLICATION of MNP Ltd. (in its capacity as court-appointed monitor of the Petitioners the "**Monitor**") coming on for hearing at Vancouver, British Columbia, on this date; AND ON HEARING Lance Williams and Ashley Bowron, counsel for the Monitor, and those other counsel listed on **Schedule "B"** hereto; AND UPON READING the materials filed, including the Third Report of the Monitor, MNP Ltd., dated August 21, 2024;

THIS COURT ORDERS AND DECLARES THAT:

EXTENSION OF STAY

1. The stay of proceedings, and all other relief granted under the Amended and Restated Initial Order pronounced by this Court in the within proceedings on July 27, 2023, be and is hereby continued and extended from August 30, 2024 up to and including November 1, 2024.

GENERAL

2. 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 Lawyer for the Monitor
McCarthy Tétrault LLP
(Lance Williams and Ashley Bowron)

BY THE COURT

REGISTRAR

SCHEDULE "A"

LIST OF PETITIONERS

1138279 B.C. Ltd.
1164312 B.C. Ltd.
Ad Prolem Capital Investments Ltd.
Clover 67 Private Dining Room Ltd.
Edith & Arthur Public House Ltd.
Joseph Bourque Investments Ltd.
Joseph Richard Hospitality Group Ltd.
Joseph Richard Investments Ltd
Joseph Richard IP Holdings Ltd.
Joseph Richard Management Ltd.
JRG Canteen Virtual Kitchen Ltd.
JRG Clover Station LRS Ltd.
JRG Cloverdale Holdings Ltd.
JRG Cloverdale Ventures Ltd.
JRG Foodhall (Vancouver) Ventures Ltd.
JRG Glass House Estates Winery Ltd.
JRG Ledgeview Holdings Ltd.
JRG Steveston Hotels Ltd.
JRG Systems Ltd.
JRG Whiskey Charlie Cafe, Pitt Meadows Ltd.

Livelyhood Public House Ltd.
Micky's Investments (Coquitlam) Ltd.
Monkey See Tiki Bar Ltd.
Oak & Thorne Public House Ltd.
Oceanside Yacht Club And Public House Ltd.
S & L Kitchen & Bar Holdings Abbotsford Ltd.
S & L Kitchen & Bar Holdings Langley Ltd.
S & L Kitchen & Bar Holdings South Surrey Ltd.
Steveston Hospitality Services Ltd.
Sudo Asian Kitchen Holdings (Langley) Ltd.
The Italian Osteria and Cheese Bar Ltd.
The Phat Bird Public House Ltd.
The Study Public House Ltd.
Townhall Holdings (Abbotsford) Ltd.
Townhall Holdings (Chilliwack) Ltd.
Townhall Holdings (Coquitlam) Ltd.
Townhall Holdings (Maple Ridge) Ltd.
Townhall Holdings (South Surrey) Ltd.
Townhall Holdings Ltd.
Whiskey Charlie Holdings Ltd.

Non-Petitioner Entities:

Blank Canvas Catering Ltd.
JRG Queens LRS Ventures Ltd.
JRG Chilliwack Holdings Ltd.
JRG Growth Ventures Ltd.
JRG Published Holdings Ltd.
JRG Whip Holdings Ltd.

SCHEDULE "B"

LIST OF COUNSEL

Counsel	Party