

COURT FILE NUMBER BKY-RG-00269-2024

COURT OF KING'S BENCH FOR SASKATCHEWAN
IN BANKRUPTCY AND INSOLVENCY

DIVISION NUMBER 02 – SASKATOON

ESTATE NUMBER 23-3119275

***IN THE MATTER OF THE PROPOSAL OF RIVERIENE FARM LTD.
UNDER DIVISION I OF THE BANKRUPTCY AND INSOLVENCY ACT, RSC 1985, C. B-3.***

DRAFT ORDER

Before the Honourable Justice _____ in Chambers the _____ day of November, 2024.

Upon the Application of Jeffrey M. Lee K.C., counsel on behalf of the Applicant, MNP Ltd., in its capacity as proposal trustee ("**Proposal Trustee**") of Riveriene Farm Ltd. (the "**Company**"); and upon hearing from counsel for the Proposal Trustee and all other interested parties present; and upon reading the Notice of Application on behalf of the Proposal Trustee dated October 21, 2024 (the "**Application**"), Form 40 – Report of the Trustee on the Amended Proposal dated October 18, 2024 (the "**Proposal Trustee's Report**"), the Draft Order, and the Brief of Law, all filed, and the pleadings and proceedings herein:

THE COURT ORDERS:

1. Terms which are capitalized in this Order but which are not defined herein shall bear the respective meanings ascribed to them in the Amended Proposal to Creditors by the Company dated October 10, 2024 (the "**Amended Proposal**") pursuant to Division I of Part III of the *Bankruptcy and Insolvency Act*, RSC 1985, c B-3 (the "**BIA**") and approved by the Creditors of the Company at a meeting held on October 10, 2024, which Amended Proposal is appended to the Proposal Trustee's Report.
2. Service of the Application and all materials in support thereof is deemed to be good, timely, and sufficient and is validated on all Persons affected by the Proposal, including, without limitation, all Creditors.
3. The Proposal is fair and reasonable and has been approved by the requisite majorities of Creditors in accordance with the requirements of the BIA.
4. The Proposal shall be and is hereby approved pursuant to section 60(5) of the BIA.
5. Any Claims that are not received by the Proposal Trustee by the Claims Bar Date shall not be admitted as a Proven Claim and shall forever be barred and extinguished.
6. Upon the Proposal Trustee issuing to the Company a Certificate of Full Performance, the Company and each and every present and former shareholder, officer, director, employee, auditor, financial advisor, legal counsel, and agent of the Company and the Proposal Trustee and its legal counsel shall be released and forever discharged from and against any and all Claims, and all such Claims shall be forever barred and extinguished.
7. The Proposal Trustee and/or the Company are hereby authorized and directed to take all further actions or steps necessary or appropriate to implement and complete the Proposal.

8. The Proposal Trustee's actions, conduct, and activities from August 22, 2024 through to and including October 18, 2024, as described in the Proposal Trustee's Report, shall be and are hereby approved.
9. Service of this Order shall be good, timely, and sufficient and validated on all Persons affected by the Proposal by performance of each of the following:
 - (a) delivery of this Order to all Persons appearing at the Application by e-mail, courier, registered mail, or personal delivery; and
 - (b) posting of this Order on the website established by the Proposal Trustee for these proceedings.

ISSUED at Saskatoon, Saskatchewan, this ____ day of November, 2024.

(Deputy) Local Registrar

CONTACT INFORMATION AND ADDRESS FOR SERVICE

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