

Clerk's Stamp:

COURT FILE NUMBER 24-3260771

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

JUDICIAL CENTRE EDMONTON

IN THE MATTER OF THE *BANKRUPTCY AND INSOLVENCY ACT*, R.S.C. 1985, C. B-3, AS AMENDED

AND IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF FORDEN ENERGY INC.

AND IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF 2150865 ALBERTA LTD.

DOCUMENT **NOTICE OF APPLICATION**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

DLA Piper (Canada) LLP
2700, 10220-103 Ave NW
Edmonton, AB T5J 0K4
Attention: Jerritt R. Pawlyk / Anthony Mersich / Isaac Belland
Phone: 780.429.6835
Email: jerritt.pawlyk@ca.dlapiper.com / anthony.mersich@ca.dlapiper.com / isaac.belland@ca.dlapiper.com
File No.118995.00001

NOTICE TO RESPONDENT

This application is made against you. You are a Respondent.

You have the right to state your side of this matter before the applications judge.

To do so, you must be in Court when the application is heard as shown below:

Date	December 12, 2025
Time	2:00 P.M.
Where	https://albertacourts.webex.com/meet/virtual.courtroom86
Before Whom	The Honourable Justice L. K. Harris

Go to the end of this document to see what else you can do and when you must do it.

Remedy claimed or sought:

1. Forden Energy Inc. ("**Forden**") and 2150865 Alberta Ltd. ("**215**", and together with Forden, the "**Applicants**") seek an order substantially in the form of the draft order attached hereto as Schedule "A" providing for the following relief:
 - (a) abridging the time for service of this Application and declaring service good and sufficient, if necessary;
 - (b) extending the period for the Applicants to file a proposal and extending the stay of proceedings against the Applicants to and including January 29, 2026, pursuant to section 50.4(9) of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3 (the "**BIA**"); and
 - (c) such further and other relief as counsel may advise and this Honourable Court may deem just.

Grounds for making this application:

2. The Applicants are insolvent entities that have filed Notices of Intention to Make a Proposal ("**NOI**") under the BIA and are currently operating under a stay of proceedings. The NOI proceedings of Forden and 215 were administratively consolidated by Order of this Honourable Court dated October 28, 2025 (the "**SISP Order**").
3. The stay of proceedings for both Applicants expires on December 15, 2025.
4. Pursuant to section 50.4(9) of the BIA, an extension of the stay of proceedings is warranted as the Applicants have acted, and are acting, in good faith and with due diligence; they are likely to make a viable proposal if the extension is granted by allowing the SISP to proceed; and no creditor would be materially prejudiced by the extension
5. The SISP Order approved a sale and investment solicitation process (the "**SISP**") for the Applicants' assets, which is currently underway. The SISP provides for a Binding Bid Deadline of December 9, 2025.
6. An extension of the stay is necessary to provide the time required to complete the SISP, select a successful bid, seek a sale approval order from this Court, and thereafter file a proposal to creditors funded by the proceeds of the SISP.

Material or evidence to be relied on:

7. Fourth Affidavit of Nigel Woollam.
8. Brief of Law.
9. Third Report of the Proposal Trustee.
10. First Extension Order, dated September 11, 2025.
11. SISP Order, dated October 28, 2025.
12. Such further and other material as counsel may advise and this Honourable Court may permit.

Applicable rules:

13. Part 9, Division 5; Rules 6.9(1) (b) and Rule 13.5(2) (3) of the *Alberta Rules of the Court*.

Applicable Acts and regulations:

14. *Bankruptcy and Insolvency Act*, RSC 1985, c B-3.

Any irregularity complained of or objection relied on:

15. None.

How the application is proposed to be heard or considered:

16. Via Webex, in Virtual Courtroom 86, before the Honourable Justice Harris.

WARNING

If you do not come to Court either in person or by your lawyer, the Court may give the applicant(s) what they want in your absence. You will be bound by any order that the Court makes. If you want to take part in this application, you or your lawyer must attend in Court on the date and at the time shown at the beginning of the form. If you intend to rely on an affidavit or other evidence when the application is heard or considered, you must reply by giving reasonable notice of the material to the applicant.

Schedule "A"

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DOCUMENT ORDER (Third Stay Extension)

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DLA Piper (Canada) LLP
2700, 10220-103 Ave NW
Edmonton, AB T5J 0K4
Attention: Jerritt R. Pawlyk / Anthony Mersich / Isaac P. Belland
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File No.118995.00001

DATE ON WHICH ORDER WAS PRONOUNCED:	December 12, 2025
LOCATION WHERE ORDER WAS PRONOUNCED:	Edmonton
NAME OF JUSTICE WHO MADE THIS ORDER:	L. K. Harris

UPON THE APPLICATION of Forden Energy Inc. ("Forden") and 2150865 Alberta Ltd. ("215", and together with Forden, the "Applicants"); **AND UPON HAVING REVIEWED** the Notice of Application and the Fourth Affidavit of Nigel Woollam sworn December 1 2025; **AND UPON HEARING** from counsel for the Applicants, counsel for G. Chan & Associates Inc., in its capacity as proposal trustee of the Applicants (the "Proposal Trustee"), and any other counsel present;

IT IS HEREBY ORDERED AND DECLARED THAT:

SERVICE

1. Service of notice of this Application and supporting materials is hereby declared to be good and sufficient, no other person is required to have been served with notice of this Application, and time for service of this Application is abridged to that actually given.

3. Service of this Order shall be effected in accordance with the service protocol established in the Orders of this Court dated September 11, 2025, and October 28, 2025.

THIRD STAY EXTENSION

4. Pursuant to section 50.4(9) of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended (the “**BIA**”), the period within which the Applicants may file a proposal to their respective creditors is hereby extended to and including January 29, 2026, and the general stay of proceedings against the Applicants is hereby extended to 11:59 p.m. (Mountain Time) on January 29, 2026.

GENERAL

5. This Court hereby requests the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or in the United States to give effect to this Order and to assist the Applicants, the Proposal Trustee, and their respective agents in carrying out the terms of this Order.

6. The Applicants or the Proposal Trustee may from time to time apply to this Court for advice and directions in the discharge of their powers and duties hereunder and in respect of the interpretation or implementation of this Order.

J.C.K.B.A