

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

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File No.118995.00001

NOTICE TO RESPONDENT

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

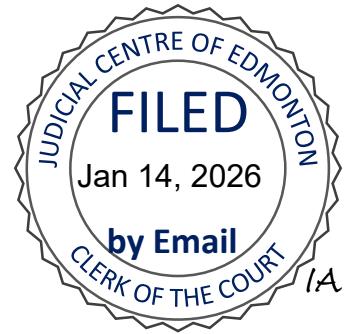
You have the right to state your side of this matter before the applications judge.

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

Date	January 23, 2026
Time	2:00 P.M.
Where	https://albertacourts.webex.com/meet/virtual.courtroom86
Before Whom	The Honourable Justice Neilson

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 February 27, 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 January 29, 2026.
- 4. Phase 1 of the SISP concluded on December 18, 2025, and was successful, culminating in the receipt of six (6) separate non-binding letters of intent.
- 5. Phase 2 of the SISP is now underway. The deadline for qualified bidders to submit binding bids is January 22, 2026.
- 6. The current stay of proceedings, which expires on January 29, 2026, provides insufficient time to complete the SISP, which requires time to, among other things: (i) receive and evaluate binding bids; (ii) select a successful bid or bids; (iii) negotiate and execute a definitive purchase and sale agreement; and (iv) seek Court approval for any resulting transaction.
- 7. A successful transaction through the SISP is probable and will form the basis of a viable proposal that will provide a materially better recovery for all creditors than would be realized in a bankruptcy, which would halt the SISP and lead to a significant erosion of value.
- 8. 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

Material or evidence to be relied on:

- 9. Sixth Affidavit of Nigel Woollam, to be filed.
- 10. Brief of Law, to be filed.
- 11. Proposed form of order, to be filed.
- 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 Neilson.

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.