

COURT FILE NUMBER 24-3356741

COURT COURT OF KING'S BENCH OF ALBERTA

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 ENDRUM ENERGY CORP.

Clerk's Stamp

DOCUMENT **APPLICATION**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

OGILVIE LLP
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File No.: 71423.4

NOTICE TO RESPONDENTS

This application is made against you. You are a respondent. You have the right to state your side of this matter before the Presiding Justice. To do so, you must be in Court when this application is heard as shown below:

Date: **June 15, 2026**

Time: **2:00 p.m.**

Where: **Edmonton Courts via WebEx, Virtual Courtroom**

<https://albertacourts.webex.com/meet/virtual.courtroom86>

Before whom: **The Honourable Justice D.R. Mah**

Remedy claimed or sought:

1. The Applicant, Endrum Energy Corp. (the "**Company**"), seeks an order, pursuant to sections 50.4(9) of the *Bankruptcy and Insolvency Act*, RSC 1985, c B-3 (the "**BIA**"), substantially in the form of the draft Second Extension Order (the "**Second Extension Order**") attached to this Application as **Schedule "A"**:

- (a) abridging time for service of this Application and deeming service good and sufficient, if necessary;
- (b) validating service of this Application;
- (c) extending the 45-day period, expiring June 21, 2026, within which the Company is required under section 50.4(9) of the *BIA* to file a proposal, by an additional forty-five (45) days to 11:59 p.m. (Mountain Time) on August 5, 2026 (the “**Second Stay Extension**”); and
- (d) such further and other relief as this Honourable Court may deem appropriate or necessary.

Grounds for making this application:

Background

- 2. On April 7, 2026, the Company filed a Notice of Intention to Make a Proposal (the “**NOI**”) pursuant to section 50.4 of the *BIA*. G. Chan & Associates was appointed as the proposal trustee of the Company (the “**Proposal Trustee**”).
- 3. On May 6, 2026, the Court granted an Order, among other things, extending the 30-day stay period pursuant to section 50.4(9) of the *BIA* (the “**First Extension Order**”) for 45-days. The First Extension Order expires on June 21, 2026.

Stay Extension

- 4. Pursuant to section 50.4(9) of the *BIA*, the Court may grant extensions not exceeding 45 days each, up to an aggregate maximum of five months. The requested Second Stay Extension of 45 days would bring the total stay period to two months following the initial 30-day stay. Without this extension, the Company will be deemed to have made an assignment into bankruptcy pursuant to section 50.4(8) of the *BIA* immediately upon the expiry of the First Extension Order on June 21, 2026, to the detriment of all creditors, and stakeholders.
- 5. The Company is likely to file a viable proposal before the aggregate 5-month maximum extension period under section 50.4(9) of the *BIA* expires. No creditor or stakeholder will be materially prejudiced by the Second Stay Extension. Accordingly, the Applicant submits that the Second Stay Extension is justified under section 50.4(9) of the *BIA*.
- 6. Since filing the NOI and the granting of the First Extension Order, the Company has been diligently working toward formulating a proposal to its creditors but requires additional time to complete this process. In particular, the Company has:

- (a) worked cooperatively with the Proposal Trustee to manage cashflow and prepare a draft projected five-year budget;
 - (b) hired a Chief Executive Officer in Alberta to manage operations and assist in formulating a proposal;
 - (c) completed a detailed analysis of contracts and service providers to identify those critical to operations;
 - (d) continued to operate the business; and
 - (e) acted and continues to act in good faith and with due diligence to prepare a proposal.
7. The Second Stay Extension is necessary to provide the time required to:
- (a) continue working with the Proposal Trustee on the projected five-year budget;
 - (b) reduce operational expenses; and
 - (c) formulate and present a viable proposal to its creditors.

Material or evidence to be relied on:

- 8. First Affidavit of Norman Antonio Morales, sworn April 24, 2026 and filed May 4, 2026;
- 9. Second Affidavit of Norman Antonio Morales, sworn June 8, 2026, to be filed;
- 10. First Report of the Proposal Trustee dated April 30, 2026;
- 11. Second Report of the Proposal Trustee, to be filed;
- 12. Bench Brief dated June 8, 2026, to be filed;
- 13. Order granted by the Honourable Justice M.E. Burns on May 6, 2026; and
- 14. Such further and other material as counsel may advise.

Applicable rules:

- 15. Rules 6.3(1) and 6.9(1) of the *Alberta Rules of Court*, Alta Reg. 124/2010.

Applicable Acts and regulations:

- 16. *Bankruptcy and Insolvency Act*, RSC 1985, c. B-3.
- 17. *Bankruptcy and Insolvency General Rules*, CRC, c 368.

Any irregularity complained of or objection relied of:

18. Not applicable to this Application.

How the application is proposed to be heard or considered:

19. Via WebEx, in Virtual Courtroom 86, before the Honourable Justice D.R. Mah.

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 **STAY EXTENSION ORDER**

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DATE ON WHICH ORDER WAS PRONOUNCED:	June 15, 2026
LOCATION WHERE ORDER WAS PRONOUNCED:	Edmonton, Alberta
NAME OF JUSTICE WHO MADE THIS ORDER:	Justice D.R. Mah

UPON THE APPLICATION of the Applicant, Endrum Energy Corp. (the "**Company**"); **AND UPON** considering the filed Application and the Second Affidavit of Norman Antonio Morales, sworn June 8, 2026; and the Affidavit of Service, filed; **AND UPON** hearing representation from counsel for the Company; **AND UPON** hearing from G. Chan & Associates Inc. (the "**Proposal Trustee**") and any other parties present;

IT IS HEREBY ORDERED AND DECLARED THAT:**Service**

1. Service of the Application and supporting materials is hereby deemed to be good, timely and sufficient.

Extension of time to file proposal

2. Pursuant to section 50.4(9) of the *Bankruptcy and Insolvency Act*, RSC 1985, c B-3 ("**BIA**"), the period within which the Company may file a proposal shall be and is hereby extended to 11:59 p.m. (Mountain Time) on August 5, 2026.
3. The general stay of proceedings against the Company imposed by section 69 of the *BIA* is extended to 11:59 p.m. (Mountain Time) on August 5, 2026.

Aid and Recognition

4. 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 Company, Proposal Trustee and its agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders as to provide such assistance to the Company and the Proposal Trustee, as an officer of this Court, as may be necessary or desirable to give effect to this Order or to assist the Company, the Proposal Trustee and its agents in carrying out the terms of this Order.

General

5. The Company and the Proposal Trustee may, from time to time apply, to this Court to amend this Order, to seek the advice and direction of this Court, or to seek this Court's approval of transactions.

J.C.K.B.A