



OUR FILE: 71423.4

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September 10, 2026

**Sent Via Email:** [CommercialCoordinator.KBJEdmonton@albertacourts.ca](mailto:CommercialCoordinator.KBJEdmonton@albertacourts.ca)

Office of the Edmonton Commercial Coordinator

Edmonton Law Courts

1A Sir Winston Churchill Square

Edmonton, AB T5J 0R2

Dear Sir/Mesdames:

**Re: 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 Corporation (the "Debtor")  
Court of King's Bench Edmonton Action No. 243356741  
Application to be heard on: September 17, 2026 at 10 a.m. (the  
"Application")**

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We are counsel to Endrum Energy Corp., the Debtor in this matter. Further to our correspondence of September 2, 2026, the Debtor's Application is currently scheduled on the Commercial List for **September 17, 2026 at 10 a.m.** before the Honourable Justice Neilson.

Please find enclosed, in support of our Application, the following materials which the Debtor wishes to rely on at the Application:

1. Application, to be filed;
2. Fourth Affidavit of Norman Antonio Morales, sworn September 9, 2026, to be filed;
3. Brief of Law dated September 10, 2026, to be filed;
4. Supplemental Affidavit of Norman Antonio Morales sworn July 28, 2026 and filed July 31, 2026;
5. Third Affidavit of Norman Antonio Morales, sworn July 27, 2026 and filed August 18, 2026;
6. Affidavit of Firyal Hamdan, sworn August 4, 2026 and filed August 7, 2026;
7. Affidavit of John McMahon, sworn August 21, 2026 and filed August 25, 2026;
8. Third Report of the Proposal Trustee dated July 31, 2026;
9. Fourth Report of the Proposal Trustee dated August 27, 2026;
10. Brief of Law of the Alberta Energy Regulator, filed August 26, 2026; and
11. Affidavit of Steven Oldale, sworn August 6, 2026 and filed August 7, 2026.



The Application, Brief, and Fourth Affidavit have been submitted to the Court for filing. We will provide filed copies upon receipt.

The Debtor acknowledges that the deadline for filing and serving materials was September 8, 2026 pursuant to Commercial Practice Note 1. The Debtor was waiting on important information being provided by third parties in order to finalize its materials, and as such was not in a position to file by the deadline. We ask for leave of the Court for permission to file our materials today. We have no concerns if the Respondents seek leave to file their materials early next week.

If leave is granted, please advise if Justice Neilson requires hard copies of the materials and our office will provide same.

We apologize for the earlier communication sent from our office in error. We value the Court's time and attention and regret any inconvenience this may have caused. Thank you for your assistance in this matter and please do not hesitate to contact me should you require anything further.

Sincerely,

**OGILVIE LLP**

Per:

A handwritten signature in black ink, appearing to read "Leah Macklin".

**For: LEAH MACKLIN**

/ns

Encls.

Cc: Proposal Trustee, Lawson Lundell LLP