

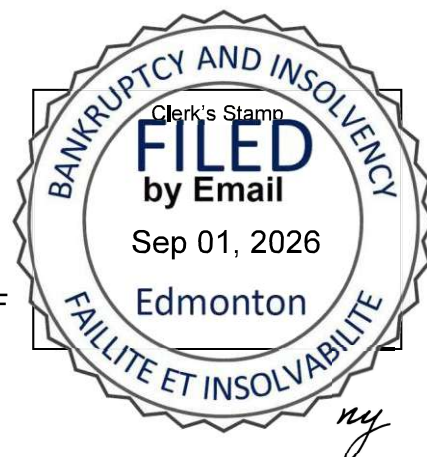
COURT FILE NUMBER    B303 389146

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  
ONSITE3D LTD., ONSITE3D INDUSTRIAL  
SERVICES LTD., and ONSITE3D DIGITAL  
SOLUTIONS LTD.



DOCUMENT                      **APPLICATION**

ADDRESS FOR SERVICE AND  
CONTACT INFORMATION OF  
PARTY FILING THIS  
DOCUMENT

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File No.:              74349.1

**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 Justice.

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

Date:                    September 3, 2026

Time:                   2:00 P.M.

Where:                Edmonton Courts via WebEx, Virtual Courtroom 86  
<https://albertacourts.webex.com/meet/virtual.courtroom86>

Before whom:        The Honourable Justice J.T. Neilson

**Remedy claimed or sought:**

1. The Applicants, ONSITE3D Ltd. ("**Onsite3D**"), ONSITE3D Industrial Services Ltd. ("**Onsite3D Industrial**"), and ONSITE3D Digital Solutions Ltd. ("**Onsite Digital**") (each a "**Company**" and collectively, the "**Companies**"), apply for the following relief:
  - (a) An Order, pursuant to section 50.4(9) of the *Bankruptcy and Insolvency Act*, RSC 1985, c B-3 (the "**BIA**"), substantially in the form of the draft First Extension Order (the "**First Extension Order**") attached as **Schedule "A"**:
    - (i) abridging time for service of this Application and deeming service good and sufficient, if necessary; and
    - (ii) extending the first 45-day extension period, expiring September 5, 2026, within which the Companies are required under section 50.4(8) of the *BIA* to file a proposal, by an additional forty-five (45) days to 11:59 p.m. (Mountain Time) on October 20, 2026 (the "**Stay Period**");
  - (b) And an Order, substantially in the form attached as **Schedule "B"**:
    - (i) temporarily sealing the Confidential Exhibits (as defined below) until the earlier of (i) acceptance of a proposal by the requisite statutory majority of the Companies' creditors; (ii) sale of the property appraised in the Confidential Exhibits in these proceedings, or any related insolvency proceedings, or (iii) until further order of this Honourable Court (the "**Restricted Court Access Order**"); and
  - (c) such further and other relief as this Honourable Court may deem appropriate or necessary.

### **Grounds for making this application:**

#### Background

2. The Companies are an Indigenous-owned group of companies that are pioneers in providing advanced industrial manufacturing and digital engineering technology services in Alberta. The Companies are incorporated pursuant to the laws of the Province of Alberta.
3. On June 22, 2026, the Companies each filed a Notice of Intention to Make a Proposal (the "**NOIs**") pursuant to section 50.4 of the *BIA*. G. Chan & Associates Inc. was appointed as the proposal trustee (the "**Proposal Trustee**") of the Companies at the time of filing the NOIs.
4. On July 9, 2026, this Court granted an order extending the initial 30-day Stay Period for 45-days to September 5, 2026 (the "**First Extension Order**").

#### Stay Extension

5. Pursuant to section 50.4(8) of the *BIA*, the Companies are required to put forward a proposal within 30 days from the filing of the NOIs, unless granted an extension by this Honourable Court.

6. This Honourable Court has the discretionary authority pursuant to section 50.4(9) of the *BIA* to extend the time, by a period not exceeding 45 days, in which an insolvent debtor that has filed a NOI is required to put forward a proposal to its creditors. If such extension is not granted, the Companies will, immediately and automatically following September 5, 2026, be deemed to have made an assignment into bankruptcy pursuant to section 50.4(8) of the *BIA* to the detriment of all its creditors, employees, and other stakeholders.
7. The Companies are likely to be able to put forward a viable proposal prior to the expiry of the aggregate 5-month maximum extension period set out in section 50.4(9) of the *BIA*. Additionally, none of the Companies' creditors or other stakeholders are likely to be materially prejudiced by the granting of an extension. Resultantly, the Applicants submit that the grant of an initial 45-day extension pursuant to section 50.4(9) of the *BIA* is justified.
8. Since filing the NOIs, the Companies have been diligently working toward formulating a proposal to their creditors but require additional time to complete this process. In particular, the Companies have: (a) worked cooperatively with the Proposal Trustee to manage cashflow; (b) worked diligently with the Proposal Trustee and its legal counsel to identify and quantify creditor claims; and (c) acted and are continuing to act in good faith and with due diligence in completing the preliminary work and preparation with efforts to make a proposal to its creditors.

#### Sealing of the Confidential Exhibits

9. The Second Affidavit of Wade Tyler Eno, sworn August 28, 2026, contains three confidential Exhibits (the "**Confidential Exhibits**"), which contain confidential commercial information regarding appraisals of the Companies' assets which, if disclosed to third parties before a proposal is accepted or a sale occurs, could materially prejudice the ability of the Companies to make a viable proposal to their creditors. The public have an interest in the efficacy and fairness of court-supervised proposal proceedings.
10. The terms of the Restricted Court Access Order are the least restrictive and least prejudicial alternative to the open court principle, and are necessary to effect the sealing of the Confidential Exhibits.
11. The salutary effects of the Restricted Court Access Order outweigh its deleterious effects, including the public interest in open and accessible court proceedings.
12. The media will be notified of this Application for a Restricted Court Access Order.
13. It is appropriate that this Honourable Court seal the Confidential Exhibits on the Court record.

#### **Material or evidence to be relied on:**

14. First Affidavit of Wade Tyler Eno, sworn July 3, 2026 and filed July 8, 2026;
15. Second Affidavit of Wade Tyler Eno, sworn August 28, 2026, to be filed;
16. Confidential Exhibits to the Second Affidavit of Wade Tyler Eno sworn August 28, 2026;

17. Third Report of the Proposal Trustee dated August 26, 2026;
18. Bench Brief of the Applicants; and
19. Such further and other material as counsel may advise.

**Applicable rules:**

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

**Applicable Acts and regulations:**

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

**Any irregularity complained of or objection relied of:**

22. Not applicable to this Application.

**How the application is proposed to be heard or considered:**

23. Via WebEx, in Virtual Courtroom 86, before the Honourable Justice J.T. 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.