

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

IN THE MATTER OF THE *COMPANIES' CREDITORS*  
*ARRANGEMENT ACT*, R.S.C. 1985, c. C-36

AND

IN THE MATTER OF THE *BUSINESS CORPORATIONS ACT*, S.B.C. 2002, c. 57

AND

IN THE MATTER OF ELEVATION GOLD MINING CORPORATION,  
ECLIPSE GOLD MINING CORPORATION and GOLDEN VERTEX (IDAHO) CORP.

PETITIONERS

**NOTICE OF APPLICATION**

**Name of Applicants:** KSV Restructuring Inc. (“**KSV**” or the “**Monitor**”) on behalf of Elevation Gold Mining Corporation (“**Elevation**”), Eclipse Gold Mining Corporation and Golden Vertex (Idaho) Corp. (collectively, the “**Petitioners**”).

To: Those parties set out in **Schedule “A”** attached hereto.

TAKE NOTICE that an application will be made by the Monitor to the Honourable Madam Justice Fitzpatrick at the Courthouse at 800 Smithe Street, in the City of Vancouver, in the Province of British Columbia on March 5, 2025 at 10:00 a.m. for the orders set out in Part 1 below.

The Monitor estimates that the application will take 1 hour.

This matter is not within the jurisdiction of an Associate Judge. The Honourable Madam Justice Fitzpatrick is seized of this matter and the hearing has been set by Supreme Court Scheduling.

**Part 1: ORDERS SOUGHT**

1. The Monitor seeks an order, substantially in the form of draft order attached hereto as **Schedule “B”**, among other things, declaring that Patriot Gold Corp. (“**Patriot**”) and those parties set out in **Schedule “C”** hereto (collectively, the “**Greenwood Claimants**”) have no interest in the Sale Proceeds (as defined herein) and authorizing the Monitor to distribute the Sale Proceeds in its discretion in accordance with the distribution order granted herein on December 17, 2024 (the “**Distribution Order**”) and without regard to any claims of Patriot or any of the Greenwood Claimants.

## **Part 2: FACTUAL BASIS**

1. Capitalized terms used herein and not otherwise defined have the meanings ascribed to them in the Fifth Report of the Monitor dated January 27, 2025 (the “**Fifth Report**”).

### BACKGROUND

2. On December 17, 2024, the BC Court granted the following orders:
  - (a) the Sale Approval Order, among other things, approving the Transaction in respect of the sale of the Purchased Assets; and
  - (b) the Distribution Order, among other things, providing a 30-day period for creditors to deliver a written notice to the Monitor asserting an interest in the Purchased Assets ranking in priority to Maverix’s interest therein (a “**Priority Claim**”).
3. On December 30, 2024, the US Court granted the Sale Recognition Order enforcing the Sale Approval Order in the United States. The Transaction closed on December 31, 2024.
4. As of February 18, 2025, the Monitor had received written notices from the following parties asserting a Priority Claim:
  - (a) Patriot;
  - (b) Nomad Royalty Corporation Ltd. (“**Nomad**”); and
  - (c) the following Greenwood Claimants:
    - (i) LeaAnn Cogswell;
    - (ii) Brooks C. Wilson and Barrie Lee Bliesner (Perry) Dugan;
    - (iii) Harris Greenwood;
    - (iv) Jill D'Aubery;
    - (v) Mindy Kammerdiener; and
    - (vi) Burdine Giese and Mary Abell.
5. Subsequently, Nomad, which is asserting claims similar to Patriot in the US Court, confirmed to the Monitor, through its legal counsel, that it does not assert a claim to the Sale Proceeds.
6. Although each of the written notices received by the Monitor asserted a Priority Claim, none of the notices included an evidentiary or legal basis sufficient to explain why such claimants’ interest in the Purchased Assets (and, by extension, the Sale Proceeds) would rank in priority to the interests of Maverix therein.

### THE TRANSACTION

7. The Sale Approval Order approved the Transaction whereby, among other things:
- (a) the Purchased Assets vested in the Purchaser free and clear of any claims and encumbrances;
  - (b) all of Golden Vertex Corp.'s ("GVC"), right title and interest in the GVC Residual Assets were transferred to and vested in Elevation;
  - (c) all claims and encumbrances that attached to the Purchased Assets and the GVC Residual Assets continued to attach to the Sale Proceeds and the GVC Residual Assets with the same nature and priority as they had prior to the completion of the Transaction or the transfer of the GVC Residual Assets to Elevation; and
  - (d) GVC retained all of the GVC Retained Liabilities.
8. Under the Agreement of Purchase and Sale dated December 2, 2024 (the "APA"):
- (a) "Purchased Assets" is defined as all right, title and interest of Elevation in, to and under:
    - (i) the GVC Shares<sup>1</sup>;
    - (ii) the Business Information of Elevation; and
    - (iii) the Storage License Agreement dated August 1, 2008 for the premises located at 355 Burnard Street, Vancouver, B.C.
  - (b) "GVC Residual Assets" is defined as:
    - (i) all of GVC's cash and cash equivalents, bank deposits, bank balances, and moneys in possession of banks, the Monitor and other depositories;
    - (ii) any Accounts Receivable from Refinery; and
    - (iii) any deposits of GVC held in trust accounts to secure payment of the reasonable fees and disbursements of the Monitor, the Sales Agent and any professional advisors of GVC, the Seller or the Monitor; and
  - (c) "GVC Retained Liabilities" include, but are not limited to:
    - (i) all Liabilities of GVC in respect of Greenwood and all tenant in common owners of the Greenwood royalty burdening only the California Moss, Lot 37 patented claim (a.k.a. the Cal. Moss Royalty);
    - (ii) all Liabilities of GVC under the Patriot Agreement, except to the extent vested off or disclaimed pursuant to the Approval and Vesting Order; and

---

<sup>1</sup> GVC was a wholly-owned subsidiary of Elevation.

- (iii) all Liabilities of GVC under the Nomad Agreement, except to the extent vested off or disclaimed pursuant to the Approval and Vesting Order.

Fifth Report at Appendix “C”.

9. The Distribution Order was granted by the BC Court in respect of the distribution of the “**Sale Proceeds**”, being the net proceeds of the sale of the Purchased Assets. For clarity: “Sale Proceeds” does not include the GVC Residual Assets, and the Distribution Order does purport to deal with the GVC Residual Assets in any way.<sup>2</sup>

PATRIOT GOLD CORP.

10. As detailed in the First Affidavit of Tim Swendseid dated July 29, 2024 (the “**Swendseid Affidavit**”), GVC’s interest in the Moss Mine is subject to a 3.0% net smelter royalty on all gold and silver production from the patented and unpatented claims covered by the Patriot Agreement.

Swendseid Affidavit at para. 82(d).

11. On November 19, 2024, Patriot filed an adversary complaint (the “**Patriot Complaint**”) in the US Court against the Petitioners for, among other things, a declaratory judgment regarding the nature of Patriot’s royalty claim (the “**Royalty Claim**”), an accounting of the proceeds received by minerals produced at the Moss Mine, a constructive trust on all proceeds received by GVC from extraction of minerals at the Moss Mine that constitute royalty proceeds, conversion, and other relief.

First Affidavit of Susan Danielisz dated December 13, 2024 at Exh “B”.

12. The Petitioners and Patriot remain engaged in ongoing litigation in the US Court regarding the Royalty Claim and Patriot’s interest in the GVC Real Property and the GVC Residual Assets.

Fifth Report at sections 4.2-4.3.

13. On January 30, 2025, counsel to Patriot delivered to the Monitor and its counsel a written notice of a Priority Claim to the Sale Proceeds for, *inter alia*, the reasons advanced by Patriot in the Chapter 15 Proceedings in the US Court.
14. On February 3, 2025, counsel for the Monitor emailed counsel for Patriot asking Patriot to confirm if they were in fact asserting an interest in the Sale Proceeds or just the GVC Residual Assets. Counsel for Patriot subsequently verbally confirmed to counsel for the Monitor that Patriot was indeed asserting an interest in the Sale Proceeds.
15. In its Application Response filed herein February 12, 2025, Patriot continues to assert a claim in the GVC Residual Assets, however it does not plead any claim as against the Sale

---

<sup>2</sup> The GVC Residual Assets, which now comprise only cash held by Elevation, are subject to an order of the US Court which provides, among other things, that the GVC Residual Assets may not be distributed without a further order of the US Court.

Proceeds or provide any basis for why such a claim would rank in priority to the interest of Maverix.

16. Additionally, in the Patriot Complaint filed in the US Court, Patriot has pleaded claims asserting an interest in the GVC Real Property and the GVC Residual Assets, but not the Purchased Assets or the Sale Proceeds.
17. Aside from the general position provided for in its written notice of priority claim, Patriot has failed to provide an explanation or evidence as to how it might assert an interest in the Purchased Assets, particularly the GVC Shares, or the Sale Proceeds derived from the sale thereof.
18. In light of the foregoing, the Monitor seeks a declaration from the BC Court confirming that Patriot has no interest in the Sale Proceeds and authorizing the Monitor to distribute the Sale Proceeds in accordance with the terms of the Distribution Order without regard for any claim by Patriot.

#### GREENWOOD ROYALTY CLAIMANTS

19. Pursuant to certain Royalty Deeds executed on varying dates by and among Patriot and the respective predecessors of each of the Greenwood Claimants, as the case may be, the Greenwood Claimants are each holders of an interest, of varying percentages, in the California Moss, Lot 37 patented claim (a.k.a. the Cal. Moss Royalty) (the “**Greenwood Royalty**”).
20. Each of the Royalty Deeds are recorded in the Official Records of Mohave County, Arizona and set out at Schedule 2.1.3(c) of the APA.
21. Several Greenwood Claimants have delivered to the Monitor written notices of a Priority Claim to the Sale Proceeds, all of which were delivered without documentation or evidence sufficient to establish an interest in the Sale Proceeds, particularly one that would rank ahead of Maverix’s interest.
22. The Monitor and its counsel have endeavoured to respond to each Greenwood Claimant advising of the distinction between the Sale Proceeds, the GVC Residual Assets and the GVC Retained Liabilities.
23. Additionally, in responses delivered to the Greenwood Claimants that delivered written notices of a Priority Claim, the Monitor confirmed that:
  - (a) any amounts due and owing under the Greenwood Royalty for mining activities after the Closing Date (i.e., December 31, 2024) are the responsibility of GVC, under its new ownership;
  - (b) claims for amounts accruing before the commencement of and during the CCAA proceedings up to the Closing Date are stayed;
  - (c) the Monitor is considering whether the Greenwood Claimants have an interest in the GVC Residual Assets; and



- (d) each of the Greenwood Claimants would be added to the service list kept by the Monitor in these proceedings, so that all Greenwood Claimants would be provided notice of any future hearings in both the BC Court and the US Court.
24. Although certain Greenwood Claimants have delivered written notices of Priority Claims to the Monitor, no such notices have provided an explanation or evidence as to how the claimants may claim an interest in the Purchased Assets, particularly the GVC Shares, or the Sale Proceeds derived from the sale thereof.

### Part 3 LEGAL BASIS

25. The Petitioners plead and rely on:
- (a) The CCAA;
  - (b) The *Supreme Court Civil Rules*, B.C. Reg. 168/2009 (the “**Rules**”);
  - (c) The inherent and equitable jurisdiction of this Honourable Court; and
  - (d) Such further and other legal basis as counsel may advise and this Honourable Court may allow.
26. The terms of the Distribution Order provide that the Monitor must reserve from the Sale Proceeds amounts sufficient to cover claims alleged to rank in priority to Maverix’s interest in the Sale Proceeds.
27. As detailed in the Fourth Report of the Monitor dated December 3, 2024 (the “**Fourth Report**”), the Monitor has obtained opinions from its Canadian and US legal counsel regarding the validity and enforceability of Maverix’s security in the Canada and US.
- Fourth Report at section 3.2.5.
28. The Sale Proceeds were derived from the sale of the Purchased Assets, which are assets of Elevation and include Elevation’s shares in GVC. The Purchased Assets did not include any assets of GVC, and, accordingly, the Sale Proceeds were not derived from the sale of any assets of GVC. The GVC Residual Assets were assets of GVC, and are separate and distinct from the Sale Proceeds.
29. Although the Monitor has received written notices of certain Priority Claims, none of the written notices received, including received from Patriot and the Greenwood Claimants, provide any evidentiary or legal basis as to why the claimant would have an interest in the Purchased Assets or the Sale Proceeds or why such interest would rank in priority to that of Maverix.
30. The proceeds from the sale of the Purchased Assets have no relationship to the GVC Residual Assets. The Monitor has not received any evidence from any party asserting a Priority Claim to establish an interest in the Sale Proceeds that would rank in priority to Maverix’s interest therein. Accordingly, the Monitor seeks a declaration from this Court

so that the Monitor can distribute the Sale Proceeds to Maverix in accordance with the terms of the Distribution Order.

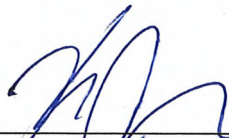
**Part 4: MATERIAL TO BE RELIED ON**

31. Affidavit #1 of Tim Swendseid, made July 29, 2024;
32. Affidavit #6 of Tim Swendseid, made December 3, 2024
33. Affidavit #1 of Susan Danielisz, made December 13, 2024;
34. Affidavit #1 of Jordan Beaulieu, made February 26, 2025;
35. Third Report of the Monitor dated October 23, 2024;
36. Fourth Report of the Monitor dated December 3, 2024;
37. Fifth Report of the Monitor dated January 27, 2025; and
38. Such further and other materials as counsel may advise and this Honourable Court may allow.

TO THE PERSONS RECEIVING THIS NOTICE OF APPLICATION: If you wish to respond to this Notice of Application, you must, within 5 business days after service of this Notice of Application or, if this application is brought under Rule 9-7, within 8 business days after service of this Notice of Application.

- (a) file an Application Response in Form 33,
- (b) file the original of every affidavit, and every other document, that
  - (i) you intend to refer to at the hearing of this application, and
  - (ii) has not already been filed in the proceeding, and
- (c) serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:
  - (i) a copy of the filed Application Response;
  - (ii) a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on that person;
  - (iii) if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7(9).

Dated: 26-Feb-2025

  
\_\_\_\_\_  
Signature of Kibben Jackson  
Lawyer for the Applicant

***To be completed by the court only:***

Order made

in the terms requested in paragraphs ..... of Part 1 of this Notice of Application

with the following variations and additional terms:  
 .....  
 .....  
 .....

Date: .....

Signature of  Judge  Associate Judge

The Solicitors for the Applicant are Fasken Martineau DuMoulin LLP, whose office address and address for delivery is 550 Burrard Street, Suite 2900, Vancouver, BC V6C 0A3 Telephone: +1 604 631 3131 Facsimile: +1 604 631 3232 (Reference: Kibben Jackson/ 267908.00021)



**APPENDIX**

The following information is provided for data collection purposes only and is of no legal effect.

**THIS APPLICATION INVOLVES THE FOLLOWING:**

- discovery: comply with demand for documents
- discovery: production of additional documents
- other matters concerning document discovery
- extend oral discovery
- other matter concerning oral discovery
- amend pleadings
- add/change parties
- summary judgment
- summary trial
- service
- mediation
- adjournments
- proceedings at trial
- case plan orders: amend
- case plan orders: other
- experts
- none of the above

**SCHEDULE "A"**  
**SERVICE LIST**

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,  
R.S.C. 1985, c. C-36, AS AMENDED

AND

IN THE MATTER OF THE *BUSINESS CORPORATIONS ACT*,  
S.B.C. 2002, C. 57, AS AMENDED

AND

IN THE MATTER OF ELEVATION GOLD MINING CORPORATION, ECLIPSE GOLD MINING CORPORATION, ALCMENE MINING INC., GOLDEN VERTEX CORP., GOLDEN VERTEX (IDAHO) CORP., and HERCULES GOLD USA, LLC

PETITIONERS

**SERVICE LIST**

(as of February 18, 2025)

<b>Party</b>	<b>Contact</b>
<b>Elevation Gold Mining Corp.</b> 1188 West Georgia St., Suite 1920 Vancouver BC V6E 4A2	Tim Swendseid (CEO) <a href="mailto:tim@elvtgold.com">tim@elvtgold.com</a>  William Dean (CFO) <a href="mailto:william@elvtgold.com">william@elvtgold.com</a>
<b>Lawson Lundell LLP</b> 1600 - 925 West Georgia Street, Vancouver, BC V6C 3L2  Suite 1100 Brookfield Place 225-6th Avenue S.W. Calgary, Alberta T2P 1N2  <i>Canadian Insolvency Counsel to Elevation Gold</i>	William Roberts <a href="mailto:wroberts@lawsonlundell.com">wroberts@lawsonlundell.com</a>  Alexis Teasdale <a href="mailto:ateasdale@lawsonlundell.com">ateasdale@lawsonlundell.com</a>  Angad Bedi <a href="mailto:abedi@lawsonlundell.com">abedi@lawsonlundell.com</a>
<b>Maxis Legal</b> Suite 910 – 800 West Pender Street Vancouver BC V6V 2V6  <i>Canadian Securities Counsel to Elevation Gold</i>	Morgan Hay <a href="mailto:mhay@maxislaw.com">mhay@maxislaw.com</a>

Party	Contact
<p><b>Fennemore Craig</b> 2394 E. Camelback Road, Suite 600 Phoenix, AZ 85016</p> <p><i>U.S. Counsel to Elevation Gold</i></p>	<p>Meidinger, Dawn <a href="mailto:dmeidinger@fennemorelaw.com">dmeidinger@fennemorelaw.com</a></p> <p>Sean Hood <a href="mailto:SHood@fennemorelaw.com">SHood@fennemorelaw.com</a></p> <p>Austin, Anthony <a href="mailto:AAustin@fennemorelaw.com">AAustin@fennemorelaw.com</a></p> <p>Rosenberg, Zachary <a href="mailto:zrosenberg@fennemorelaw.com">zrosenberg@fennemorelaw.com</a></p>
<p><b>KSV Advisory</b> 220 Bay Street, 13th Floor PO Box 20 Toronto, ON M5J 2W4</p> <p>324 - 8th Avenue SW Calgary, Alberta T2P 2Z2</p> <p><i>Monitor of Elevation Gold</i></p>	<p>Bobby Kofman <a href="mailto:bkofman@ksvadvisory.com">bkofman@ksvadvisory.com</a></p> <p>Jason Knight <a href="mailto:jknight@ksvadvisory.com">jknight@ksvadvisory.com</a></p>
<p><b>Fasken Martineau DuMoulin LLP</b> 550 Burrard Street, Suite 2900 Vancouver, BC V6C 0A3</p> <p><i>Counsel to the Monitor</i></p>	<p>Kibben Jackson <a href="mailto:kjackson@fasken.com">kjackson@fasken.com</a></p> <p>Mishaal Gill <a href="mailto:mgill@fasken.com">mgill@fasken.com</a></p> <p><a href="mailto:jbeaulieu@fasken.com">jbeaulieu@fasken.com</a></p> <p><a href="mailto:svolkow@fasken.com">svolkow@fasken.com</a></p> <p><a href="mailto:jolaw@fasken.com">jolaw@fasken.com</a></p>
<p><b>Kenneth P. Coleman</b> 2628 Broadway, New York, NY 10025</p> <p><i>U.S. Insolvency Counsel to the Monitor</i></p>	<p>Kenneth P. Coleman <a href="mailto:ken@kencoleman.us">ken@kencoleman.us</a></p>
<p><b>Womble Bond Dickinson (US) LLP</b> One S. Church Avenue Suite 2000 Tucson, AZ 85701</p> <p><i>U.S. Insolvency Counsel to the Monitor</i></p>	<p>Rob Charles <a href="mailto:robert.charles@wbd-us.com">robert.charles@wbd-us.com</a></p>

Party	Contact
<p><b>INFOR Financial</b>            Royal Bank Plaza, South Tower            200 Bay Street, Suite 2350            Toronto, ON M5J 2J2</p> <p><i>Financial Advisor to Elevation Gold</i></p>	<p>Neville Dastoor  <a href="mailto:ndastoor@inforfg.com">ndastoor@inforfg.com</a></p> <p>Paul Liebovitz  <a href="mailto:pliebovitz@inforfg.com">pliebovitz@inforfg.com</a></p>
<p><b>Triple Flag Precious Metals Corp.</b>            161 Bay Street, Suite 4535            Toronto, ON M5J 2S1            Canada</p> <p><i>Secured Creditor</i></p>	<p>Warren Beil  <a href="mailto:wbeil@tripleflagpm.com">wbeil@tripleflagpm.com</a></p>
<p><b>Torys LLP</b>            79 Wellington St. W.            30th Floor            Box 270, TD South Tower            Toronto, ON M5K 1N2 Canada</p> <p><i>Counsel to Triple Flag Precious Metals Corp.</i></p>	<p>David Bish  <a href="mailto:dbish@torys.com">dbish@torys.com</a></p>
<p><b>Patriot Gold Corp.</b>            691 Sierra Rose Dr            Suite B, Reno, NV            89511, USA</p> <p><b>Quarles &amp; Brady</b>            One Renaissance Square            Two North Central Avenue Suite 600            Phoenix, AZ 85004</p> <p><i>U.S. Counsel to Patriot Gold Corp.</i></p> <p><b>McCarthy Tétrault LLP</b>            745 Thurlow Street            Suite 2400            Vancouver BC V6E 0C5            Canada</p> <p><i>Canadian Counsel to Patriot Gold Corp.</i></p>	<p>Jimmie Pursell  <a href="mailto:jimmie.pursell@quarles.com">jimmie.pursell@quarles.com</a></p> <p>Lance Williams  <a href="mailto:lwilliams@mccarthy.ca">lwilliams@mccarthy.ca</a></p> <p>Ashley Bowron  <a href="mailto:abowron@mccarthy.ca">abowron@mccarthy.ca</a></p> <p>Jenna Clark  <a href="mailto:jkrclark@mccarthy.ca">jkrclark@mccarthy.ca</a></p> <p>Sue Danielisz  <a href="mailto:sdanielisz@mccarthy.ca">sdanielisz@mccarthy.ca</a></p>
<p><b>Royal Bank of Canada</b>            180 Wellington St W 3rd Flr            Toronto ON, M5J 1J1</p> <p>1025 West Georgia Street,            Vancouver, BC V6E 3N9 Canada</p> <p><i>Creditor</i></p>	



Party	Contact
<p><b>JPMorgan Chase Bank, N.A.</b>  Legal Papers Served  JPMorgan Chase Bank, N.A.  Mail Code LA4-7100  700 Kansas Lane  Monroe, LA, 71203 United States</p> <p><i>Creditor</i></p>	<p>John Philip Uy  <a href="mailto:CCS-Program-Coordiators@jpmchase.com">CCS-Program-Coordiators@jpmchase.com</a></p>
<p><b>Mohave Electric Cooperative. Incorporated</b>  P.O. Box 22530  Bullhead City, Arizona 86439</p> <p><i>Secured Creditor</i></p>	<p>Tyler Weldon (CFO)  <a href="mailto:TWeldon@mohaveelectric.com">TWeldon@mohaveelectric.com</a></p>
<p><b>Caterpillar Financial Services Corporation</b>  2120 West End Avenue,  Nashville, Tennessee, 37203</p> <p><i>Secured Creditor</i></p>	<p>Brooke Yoder  <a href="mailto:brooke.yoder@cat.com">brooke.yoder@cat.com</a></p>
<p><b>Asahi Refining USA, Inc.</b>  4601 W 2100 S  Salt Lake City, UT 84120</p> <p><i>Secured Creditor</i></p> <p><b>MLT Aikins LLP</b>  Suite 2600 - 1066 West Hastings Street  Vancouver, BC V6E 3X1</p> <p><i>Counsel to Asahi Refining USA, Inc.</i></p>	<p>Carmen V. Rodriguez  <a href="mailto:carmen.rodriguez@asahirefining.com">carmen.rodriguez@asahirefining.com</a></p> <p>Paul Healy  <a href="mailto:paul.healey@asahirefining.com">paul.healey@asahirefining.com</a></p> <p>William E. J. Skelly  <a href="mailto:wskelly@mltaikins.com">wskelly@mltaikins.com</a></p> <p>Jess Reid  <a href="mailto:jreid@mltaikins.com">jreid@mltaikins.com</a></p>
<p><b>Purves Redmond Limited</b>  70 University Avenue, Suite 400  Toronto, ON M5J 2M4</p>	<p>Matthew Newman  <a href="mailto:mnewman@purvesredmond.com">mnewman@purvesredmond.com</a></p>
<p><b>Whitley Legal Group, P.C.</b>  17550 N. Perimeter Dr.  Suite 100  Scottsdale, AZ 85255</p> <p><i>Counsel to Hartmut W. Baitis, Robert B. Hawkins and Larry L. Lackey</i></p>	<p>Jeff Whitley  <a href="mailto:jeff@whitleylegalgroup.com">jeff@whitleylegalgroup.com</a></p>
<p><b>Wesco</b>  3135 S. Richmond St.,  Salt Lake City, UT 84106 USA</p>	<p>Seth Hobby  <a href="mailto:seth.hobby@wescoexplosives.com">seth.hobby@wescoexplosives.com</a></p>

Party	Contact
<p><b>Mary Anderson Abell</b> 4608 Crestway Drive Austin, Texas 78731</p> <p><i>Greenwood Claim</i></p>	<p>Mary Anderson Abell <a href="mailto:m.abell@utexas.edu">m.abell@utexas.edu</a></p>
<p><b>Benjamin Giese</b></p> <p><i>Greenwood Claim</i></p>	<p>Benjamin Giese <a href="mailto:Benjamin.giese@gmail.com">Benjamin.giese@gmail.com</a></p>
<p><b>Monroe Giese</b></p> <p><i>Greenwood Claim</i></p>	<p>Monroe Giese <a href="mailto:monroe.giese@gmail.com">monroe.giese@gmail.com</a></p>
<p><b>Lhoist North America of Arizona</b> 5600 Clearfork Main Street, Suite 300 Fort Worth, TX 76109 USA</p> <p><i>Creditor</i></p> <p><b>Clark Wilson LLP</b> 900 – 885 West Georgia Street Vancouver, BC V6C 3H1 Canada Map &amp; Directions</p> <p><i>Counsel to Lhoist North America of Arizona</i></p>	<p>Nick Carlson <a href="mailto:nearlson@cwilson.com">nearlson@cwilson.com</a></p>
<p><b>KRJA Systems, Inc. / Maptek</b> 14143 Denver West Parkway, Suite 200, Golden, CO 80401 USA</p> <p><i>Creditor</i></p>	<p>Robb Yarger <a href="mailto:robb.yarger@maptek.com">robb.yarger@maptek.com</a></p>
<p><b>Cassels Brock &amp; Blackwell LLP</b> Suite 2200, RBC Place 885 West Georgia Street Vancouver, BC V6C 3E8</p> <p><b>Snell &amp; Wilmer</b> One East Washington Street, Suite 2700 Phoenix, AZ 85004-2556</p> <p><i>Counsel to Nomad Royalty Company Limited (a subsidiary of Sandstorm Gold Ltd.)</i></p>	<p>Vicki Tickle <a href="mailto:vtickle@cassels.com">vtickle@cassels.com</a></p> <p>Bryce Suzuki <a href="mailto:bsuzuki@swlaw.com">bsuzuki@swlaw.com</a></p> <p>James Florentine <a href="mailto:jflorentine@swlaw.com">jflorentine@swlaw.com</a></p>
<p><b>Richard Himes</b></p>	<p>Richard Himes <a href="mailto:richhhmz@gmail.com">richhhmz@gmail.com</a></p>

Party	Contact
<p><b>Borden Ladner Gervais LLP</b>            Bay Adelaide Centre, East Tower            22 Adelaide St. W            Toronto, ON, M5H 4E3</p> <p><i>Counsel to Trisura Guarantee Insurance Company</i></p>	<p>James MacLellan  <a href="mailto:jmaclellan@blg.com">jmaclellan@blg.com</a></p> <p>Rebecca Torrance  <a href="mailto:rtorrance@blg.com">rtorrance@blg.com</a></p>
<p><b>McLennan Ross</b>            600 McLennan Ross Building            12220 Stony Plain Road            Edmonton, AB T5N 3Y4</p> <p><i>Counsel to Ledcor CMI Ltd.</i></p>	<p>Stephen J. Livingstone, K.C.  <a href="mailto:Steve.livingstone@mross.com">Steve.livingstone@mross.com</a></p> <p>Kara Gustafson  <a href="mailto:Kara.gustafson@mross.com">Kara.gustafson@mross.com</a></p>
<p><b>Calesido Foundation</b>            CUB Financial Centre, Lyford Cay PO Box AP            59223            Nassau, New Providence            The Bahamas</p> <p><i>Creditor</i></p>	<p>Nicolas Maitre  <a href="mailto:cosepaje@gmail.com">cosepaje@gmail.com</a></p>
<p><b>Stikeman Elliott</b>            4200 Bankers Hall West            888 3<sup>rd</sup> Street S.W.            Calgary, AB T2P 5C5</p> <p><i>Counsel to Mohave Electric</i></p>	<p>Karen Fellowes  <a href="mailto:kfellowes@stikeman.com">kfellowes@stikeman.com</a></p>
<p><b>Kelly Santini LLP</b>            160 Elgin St. Suite 2401            Ottawa, ON K2P 2P7</p> <p><i>Counsel to ME Global Inc.</i></p>	<p>Jason Dutrizac  <a href="mailto:jdutrizac@kellysantini.com">jdutrizac@kellysantini.com</a></p>
<p><b>Enterprise Car Rental</b>            EAN SERVICES, LLC            PO Box 402383            Atlanta, GA 30384-2383 USA</p>	<p><a href="mailto:BankruptcyNotifications@ehi.com">BankruptcyNotifications@ehi.com</a></p>
<p><b>Maptek</b>            14143 Denver West Parkway, Suite 200            Golden, CO 80401</p>	<p>Robb Yarger  <a href="mailto:Robb.yarger@maptek.com">Robb.yarger@maptek.com</a></p>
<p><b>Rebel Oil Company, Inc. dba ROC</b>            10650 W. Charleston Blvd. Ste 100            Las Vegas, NV 89135</p>	<p>David Ryan, Chief Financial Officer  <a href="mailto:David.Ryan@RebelOil.com">David.Ryan@RebelOil.com</a></p> <p>Marlys McGrew, Chief Legal Officer  <a href="mailto:Marlys@RebelOil.Com">Marlys@RebelOil.Com</a></p>
<p><b>Whitley Legal Group P.C.</b>            100 – 17550 N Perimeter Dr            Scottsdale, AZ 85255</p> <p><i>Counsel to Hartmut W. Baitis, Robert B. Hawkins and Larry L. Lackey</i></p>	<p>Jeff Whitley  <a href="mailto:jeff@whitleylegalgroup.com">jeff@whitleylegalgroup.com</a></p>

Party	Contact
<b>Greenstone Resources LP</b> 33 Broadwick Street London, Great Britain W1F 0DQ	Michael Haworth <a href="mailto:mhaworth@greenstoneresources.com">mhaworth@greenstoneresources.com</a>
<b>Davies Ward Phillips &amp; Vineberg LLP</b> 155 Wellington Street West Toronto, ON, M5V 3J7  <i>Counsel for EG Acquisition LLC</i>	Robin Schwill <a href="mailto:rschwill@dwpv.com">rschwill@dwpv.com</a>
<b>Melissa Gray Greenwood Morrow</b> 2502 Timberline Drive Austin, Texas 78746	Melissa Gray Greenwood Morrow <a href="mailto:melissagreenwoodmorrow@gmail.com">melissagreenwoodmorrow@gmail.com</a>
<b>Amy Norquist Greenwood Hemingway</b> 6225 Piping Rock Lane Houston, Texas 77057	Amy Norquist Greenwood Hemingway <a href="mailto:aghemingway@gmail.com">aghemingway@gmail.com</a>
<b>Marvin Harris Greenwood</b> 4526 Ranch Road 1320 Johnson City, Texas 78636	Marvin Harris Greenwood <a href="mailto:harrisgreenwood@gmail.com">harrisgreenwood@gmail.com</a> / <a href="mailto:harris@myhogheaven.com">harris@myhogheaven.com</a>
<b>Lisa Greenwood Attaya</b> PO Box 4603 Wichita Falls, Texas 76308	Lisa Greenwood Attaya <a href="mailto:attayalisa@yahoo.com">attayalisa@yahoo.com</a>
<b>Greg Greenwood</b> 1207 Matthew Avenue Murray, Utah 84121	Greg Greenwood <a href="mailto:gagreenwood@yahoo.com">gagreenwood@yahoo.com</a>
<b>Mary Grace Greenwood</b> 4141 S. Braedswood, Apt. 654 Houston, Texas 77025	Mary Grace Greenwood <a href="mailto:mggreenwood223@gmail.com">mggreenwood223@gmail.com</a>
<b>Nancy Levica Greenwood Riddle / Riddle Family Trust</b> 4246 Goodfellow Drive Dallas, Texas 75229-2814	Nancy Levica Greenwood Riddle <a href="mailto:nancygriddle@gmail.com">nancygriddle@gmail.com</a>
<b>Andrew Peden Greenwood</b> 109 Timberwilde Lane Houston, Texas 77024	Andrew Peden Greenwood <a href="mailto:apgreenwood1946@gmail.com">apgreenwood1946@gmail.com</a>
<b>Alexander William Greenwood</b> 170 Coats Circle, Pleasant Hill, CA 94523	Alexander William Greenwood <a href="mailto:alexwgreenwood@yahoo.com">alexwgreenwood@yahoo.com</a>
<b>James Greenwood III</b> 1306 B Potomac Drive Houston, Texas 77057	James Greenwood III <a href="mailto:jmgrnwd@aol.com">jmgrnwd@aol.com</a>
<b>Corinna Carr Smith</b> 3904 Solomon Av, Napa, CA 94558	Corinna Carr Smith <a href="mailto:cfsmd.sicot07@gmail.com">cfsmd.sicot07@gmail.com</a>
<b>Robert I. Carr, Jr.</b> 542 Heritage Ann Harbor, Michigan 48105-2156	Robert I. Carr, Jr. <a href="mailto:ricarr@umich.edu">ricarr@umich.edu</a>

Party	Contact
<b>John D. Carr</b> 1932 S. Oneida St. Denver, Colorado 80224-2263	John D. Carr <a href="mailto:bettytilley@yahoo.com">bettytilley@yahoo.com</a>
<b>Mary Carr Tilley</b> 714 Saddle Mountain Colorado Springs, Colorado 80919-2032	Mary Carr Tilley <a href="mailto:bettytilley@yahoo.com">bettytilley@yahoo.com</a>
<b>James Carr</b> 32514 Waterworth Court Fulshear, Texas 77441-4366	James Carr <a href="mailto:carrgo2007@yahoo.com">carrgo2007@yahoo.com</a>
<b>Pamela A. Greenwood</b> 2212 Mimosa Drive Houston, Texas 77019	Pamela A. Greenwood <a href="mailto:pamgwood@gmail.com">pamgwood@gmail.com</a>
<b>Marvin Nelson Greenwood</b> 18 North Callecita Laguna Beach, California 92651	Marvin Nelson Greenwood <a href="mailto:greenwoodnelson@gmail.com">greenwoodnelson@gmail.com</a>
<b>Mimi Ellis</b> 2206 Mimosa Drive Houston, Texas 77019	Mimi Ellis <a href="mailto:memeyum51@yahoo.com">memeyum51@yahoo.com</a>
<b>John Greenwood</b> 3507 Cherry Lane Austin, Texas 78703	John Greenwood <a href="mailto:jonyg1@gmail.com">jonyg1@gmail.com</a>
<b>Benjamin Fairfax Greenwood</b> 31881 National Park Drive Laguna Niguel, California 92677	Benjamin Fairfax Greenwood <a href="mailto:benjaminfairfax@yahoo.com">benjaminfairfax@yahoo.com</a>
<b>Joseph Harris Greenwood</b> 4917 Kirkcaldey Dr. Tyler, Texas 75703-2609	Joseph Harris Greenwood <a href="mailto:joetrap@aol.com">joetrap@aol.com</a>
<b>Michael Nan Greenwood</b> 1901 Laurel Oaks Drive Richmond, Texas 77469	Michael Nan Greenwood <a href="mailto:mgreenwood25@gmail.com">mgreenwood25@gmail.com</a>
<b>"502 West 5<sup>th</sup> Street LLC" care of Todd Green</b> 513 West 5 <sup>th</sup> Tempe, AZ 85281	"502 West 5th Street LLC" care of Todd Green <a href="mailto:tempegallery@gmail.com">tempegallery@gmail.com</a>
<b>Frances Elyse Tibbit</b> 8207 Durham Avenue Lubbock, Texas 79424	Frances Elyse Tibbit <a href="mailto:etibbitishome@suddenlink.net">etibbitishome@suddenlink.net</a>
<b>Larry Himes (for Helen Snipes Himes)</b> PO Box 7, Silver City, New Mexico 88062	Larry Himes <a href="mailto:bhimes@gilanet.com">bhimes@gilanet.com</a> Rich Himes <a href="mailto:richhhmz@gmail.com">richhhmz@gmail.com</a>
<b>LeaAnn Cogswell</b> 602 Palisado Avenue Windsor, Connecticut 06095	LeaAnn Cogswell <a href="mailto:studioworks@sbcglobal.net">studioworks@sbcglobal.net</a>
<b>Mindy Kammerdiener</b> PO Box 9806, Longview, TX 75608	Mindy Kammerdiener <a href="mailto:mindykammerdiener@gmail.com">mindykammerdiener@gmail.com</a>
<b>Melany D. Free</b> 13307 FM 225 South Laneville, Texas 75667-9648	Melany D. Free <a href="mailto:freemelany@gmail.com">freemelany@gmail.com</a>
<b>Peggy Lynn Allensworth</b> 2020 Dover Street Lakewood, CO 80215	Peggy Lynn Allensworth <a href="mailto:lynnjmapla@gmail.com">lynnjmapla@gmail.com</a>



Party	Contact
<b>Marsh Lee Snipes Melton</b> 138 Conley Place, Odessa, TX 79762	Marsh Lee Snipes Melton <a href="mailto:godsanimalkeeper@aol.com">godsanimalkeeper@aol.com</a>
<b>William Joe Snipes</b> 2305 E. Pine Lodge Road, Roswell, NM 88201	William Joe Snipes <a href="mailto:circlef293@gmail.com">circlef293@gmail.com</a>
<b>“BROOKS C. WILSON TRUST”</b> 3127 Dennis Avenue Clovis, California 93619 – 5103	<b>“BROOKS C. WILSON TRUST”</b> <a href="mailto:brooks@adanceoflight.com">brooks@adanceoflight.com</a>
<b>Barrie Lee Bliesner Perry Dugan</b> 15 Boulder Creek Court, Danville, CA 94526	Barrie Lee Bliesner Perry Dugan <a href="mailto:dugan6@comcast.net">dugan6@comcast.net</a>
<b>Mary Anderson Abell</b> 4608 Crestway Drive Austin, Texas 78731  <b>Jackson Walker LLP</b> 2323 Ross Avenue, Suite 600 Dallas, Texas 7520  <i>Counsel to Mary Anderson Abell</i>	Mary Anderson Abell <a href="mailto:m.abell@utexas.edu">m.abell@utexas.edu</a>  Aaron Lozano <a href="mailto:alozano@jw.com">alozano@jw.com</a>  Jennifer Wertz <a href="mailto:jwertz@jw.com">jwertz@jw.com</a>  Erica Giese, <a href="mailto:egiese@jw.com">egiese@jw.com</a>
<b>Burdine Anderson Giese</b> 219 Argyle Ave Alamo Heights, Texas 78209  <b>Jackson Walker LLP</b> 2323 Ross Avenue, Suite 600 Dallas, Texas 7520  <i>Counsel to Burdine Anderson Giese</i>	Burdine Anderson Giese <a href="mailto:Benjamin.giese@gmail.com">Benjamin.giese@gmail.com</a>  Aaron Lozano <a href="mailto:alozano@jw.com">alozano@jw.com</a>  Jennifer Wertz <a href="mailto:jwertz@jw.com">jwertz@jw.com</a>  Erica Giese, <a href="mailto:egiese@jw.com">egiese@jw.com</a>

**E-SERVICE LIST**

[wroberts@lawsonlundell.com](mailto:wroberts@lawsonlundell.com); [ateasdale@lawsonlundell.com](mailto:ateasdale@lawsonlundell.com); [abedi@lawsonlundell.com](mailto:abedi@lawsonlundell.com);  
[tim@elvtgold.com](mailto:tim@elvtgold.com); [william@elvtgold.com](mailto:william@elvtgold.com); [mhay@maxislaw.com](mailto:mhay@maxislaw.com); [dmeidinger@fennemorelaw.com](mailto:dmeidinger@fennemorelaw.com);  
[SHood@fennemorelaw.com](mailto:SHood@fennemorelaw.com); [AAustin@fennemorelaw.com](mailto:AAustin@fennemorelaw.com); [rosenberg@fennemorelaw.com](mailto:rosenberg@fennemorelaw.com);  
[robert.charles@wbd-us.com](mailto:robert.charles@wbd-us.com) ; [bkofman@ksvadvisory.com](mailto:bkofman@ksvadvisory.com); [jknigh@ksvadvisory.com](mailto:jknigh@ksvadvisory.com);  
[kjackson@fasken.com](mailto:kjackson@fasken.com); [mjill@fasken.com](mailto:mjill@fasken.com); [jbeaulieu@fasken.com](mailto:jbeaulieu@fasken.com); [svolkow@fasken.com](mailto:svolkow@fasken.com);  
[jolaw@fasken.com](mailto:jolaw@fasken.com); [ken@kencoleman.us](mailto:ken@kencoleman.us); [ndastoor@inforfg.com](mailto:ndastoor@inforfg.com); [pliebovitz@inforfg.com](mailto:pliebovitz@inforfg.com);  
[wbeil@tripleflagpm.com](mailto:wbeil@tripleflagpm.com); [dbish@torys.com](mailto:dbish@torys.com); [jimmie.pursell@quarles.com](mailto:jimmie.pursell@quarles.com); [lwilliams@mccarthy.ca](mailto:lwilliams@mccarthy.ca);  
[lwilliams@mccarthy.ca](mailto:lwilliams@mccarthy.ca); [abowron@mccarthy.ca](mailto:abowron@mccarthy.ca); [jkrclark@mccarthy.ca](mailto:jkrclark@mccarthy.ca); [CCS-Program-Coordina@jpmchase.com](mailto:CCS-Program-Coordina@jpmchase.com);  
[TWeldon@mohaveelectric.com](mailto:TWeldon@mohaveelectric.com); [brooke.yoder@cat.com](mailto:brooke.yoder@cat.com);  
[carmen.rodriuez@asahirefining.com](mailto:carmen.rodriuez@asahirefining.com); [paul.healey@asahirefining.com](mailto:paul.healey@asahirefining.com); [wskelly@mltaikins.com](mailto:wskelly@mltaikins.com);  
[jreid@mltaikins.com](mailto:jreid@mltaikins.com); [jeff@whitleylegalgroup.com](mailto:jeff@whitleylegalgroup.com); [seth.hobby@wescoexplosives.com](mailto:seth.hobby@wescoexplosives.com);  
[m.abell@utexas.edu](mailto:m.abell@utexas.edu); [Benjamin.giese@gmail.com](mailto:Benjamin.giese@gmail.com); [monroe.giese@gmail.com](mailto:monroe.giese@gmail.com); [ncarlson@cwilson.com](mailto:ncarlson@cwilson.com);  
[robb.yarger@maptek.com](mailto:robb.yarger@maptek.com); [vtickle@cassels.com](mailto:vtickle@cassels.com); [bsuzuki@swlaw.com](mailto:bsuzuki@swlaw.com); [jflorentine@swlaw.com](mailto:jflorentine@swlaw.com);  
[richhlmz@gmail.com](mailto:richhlmz@gmail.com); [jmacellan@blg.com](mailto:jmacellan@blg.com); [rtorrance@blg.com](mailto:rtorrance@blg.com); [Steve.livingstone@mross.com](mailto:Steve.livingstone@mross.com);  
[Kara.gustafson@mross.com](mailto:Kara.gustafson@mross.com); [cosepaje@gmail.com](mailto:cosepaje@gmail.com); [kfellowes@stikeman.com](mailto:kfellowes@stikeman.com); [jdutrizac@kellysantini.com](mailto:jdutrizac@kellysantini.com);  
[BankruptcyNotifications@ehi.com](mailto:BankruptcyNotifications@ehi.com); [Robb.yarger@maptek.com](mailto:Robb.yarger@maptek.com); [David.Ryan@RebelOil.com](mailto:David.Ryan@RebelOil.com);  
[Marlys@RebelOil.Com](mailto:Marlys@RebelOil.Com); [jeff@whitleylegalgroup.com](mailto:jeff@whitleylegalgroup.com); [mhaworth@greenstoneresources.com](mailto:mhaworth@greenstoneresources.com);  
[rschwill@dwpv.com](mailto:rschwill@dwpv.com); [sdanielisz@mccarthy.ca](mailto:sdanielisz@mccarthy.ca); [melissagreenwoodmorrow@gmail.com](mailto:melissagreenwoodmorrow@gmail.com);  
[aghemingway@gmail.com](mailto:aghemingway@gmail.com); [harrisgreenwood@gmail.com](mailto:harrisgreenwood@gmail.com); [harris@myhogheaven.com](mailto:harris@myhogheaven.com); [attayalisa@yahoo.com](mailto:attayalisa@yahoo.com);  
[gagreenwood@yahoo.com](mailto:gagreenwood@yahoo.com); [mgreenwood223@gmail.com](mailto:mgreenwood223@gmail.com); [nancygriddle@gmail.com](mailto:nancygriddle@gmail.com);  
[apgreenwood1946@gmail.com](mailto:apgreenwood1946@gmail.com); [alexwgreenwood@yahoo.com](mailto:alexwgreenwood@yahoo.com); [jmgrnwd@aol.com](mailto:jmgrnwd@aol.com); [cfsmd.sicot07@gmail.com](mailto:cfsmd.sicot07@gmail.com);  
[ricarr@umich.edu](mailto:ricarr@umich.edu); [bettytilley@yahoo.com](mailto:bettytilley@yahoo.com); [bettytilley@yahoo.com](mailto:bettytilley@yahoo.com); [carrgo2007@yahoo.com](mailto:carrgo2007@yahoo.com);  
[pangwood@gmail.com](mailto:pangwood@gmail.com); [greenwoodnelson@gmail.com](mailto:greenwoodnelson@gmail.com); [memeyum51@yahoo.com](mailto:memeyum51@yahoo.com); [jonygl@gmail.com](mailto:jonygl@gmail.com);  
[benjaminfairfax@yahoo.com](mailto:benjaminfairfax@yahoo.com); [joetrap@aol.com](mailto:joetrap@aol.com); [mgreenwood25@gmail.com](mailto:mgreenwood25@gmail.com); [tempegallery@gmail.com](mailto:tempegallery@gmail.com);  
[etibbitishome@suddenlink.net](mailto:etibbitishome@suddenlink.net); [bhimes@gilanet.com](mailto:bhimes@gilanet.com); [richhlmz@gmail.com](mailto:richhlmz@gmail.com); [studioworks@sbcglobal.net](mailto:studioworks@sbcglobal.net);  
[mindykammerdiener@gmail.com](mailto:mindykammerdiener@gmail.com); [freemelany@gmail.com](mailto:freemelany@gmail.com); [lynnjmapla@gmail.com](mailto:lynnjmapla@gmail.com);  
[godsanimalkeeper@aol.com](mailto:godsanimalkeeper@aol.com); [circlef293@gmail.com](mailto:circlef293@gmail.com); [brooks@adanceoflight.com](mailto:brooks@adanceoflight.com); [dugan6@comcast.net](mailto:dugan6@comcast.net);  
[m.abell@utexas.edu](mailto:m.abell@utexas.edu); [alozano@jw.com](mailto:alozano@jw.com); [jwertz@jw.com](mailto:jwertz@jw.com); [egiese@jw.com](mailto:egiese@jw.com); [Benjamin.giese@gmail.com](mailto:Benjamin.giese@gmail.com);  
[alozano@jw.com](mailto:alozano@jw.com); [jwertz@jw.com](mailto:jwertz@jw.com); [egiese@jw.com](mailto:egiese@jw.com)

**SCHEDULE "B"**

**DRAFT ORDER**

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

**IN THE MATTER OF THE *COMPANIES' CREDITORS*  
*ARRANGEMENT ACT*, R.S.C. 1985, c. C-36**

**AND**

**IN THE MATTER OF THE *BUSINESS CORPORATIONS ACT*, S.B.C. 2002, c. 57**

**AND**

**IN THE MATTER OF ELEVATION GOLD MINING CORPORATION,  
ECLIPSE GOLD MINING CORPORATION, and GOLDEN VERTEX (IDAHO) CORP.**

**PETITIONERS**

**ORDER MADE AFTER APPLICATION**

BEFORE THE HONOURABLE )  
 )  
MADAM JUSTICE FITZPATRICK ) March 5, 2025

ON THE APPLICATION of KSV Restructuring Inc. (“KSV”), in its capacity as monitor (in such capacity, the “**Monitor**”) of the Petitioners, coming on for hearing at Vancouver, British Columbia on this day; AND ON HEARING Kibben Jackson and Mishaal Gill, counsel for the Monitor, and those other counsel listed on Schedule “A” hereto; AND UPON READING the material filed, including the Fifth Report of the Monitor dated January 27, 2025 and the Sixth Report of the Monitor dated February [●], 2025; AND pursuant to the *Companies’ Creditors Arrangement Act*, R.S.C. 1985 c. C-36, as amended (the “**CCAA**”), the *British Columbia Supreme Court Civil Rules*, and the inherent jurisdiction of this Honourable Court;

THIS COURT ORDERS AND DECLARES THAT:

1. The time for service of the Notice of Application (the “**Application**”) for this order and the supporting materials is hereby abridged and this application is properly returnable today, and service upon any interested party other than those parties on the service list maintained in these proceedings is hereby dispensed with.

**DEFINED TERMS**

2. Capitalized terms used but not otherwise defined in this order shall have the meanings given to them in the Approval and Vesting Order granted herein on December 17, 2024 (the “AVO”).

**INTERESTS OF PATRIOT GOLD CORP. AND THE GREENWOOD CLAIMANTS**

3. Patriot Gold Corp. (“Patriot”) and those parties listed on Schedule “B” hereto (collectively, the “Greenwood Claimants”) have no interest in the net proceeds of sale of the Purchased Assets (the “Sale Proceeds”) and the Monitor is authorized to distribute the Sale Proceeds in its discretion in accordance with the distribution order granted herein December 17, 2024 and without regard to any claims of Patriot or any of the Greenwood Claimants.

**GENERAL**

4. THIS COURT REQUESTS the aid and recognition of other Canadian and foreign courts, tribunals, and regulatory or administrative bodies having jurisdiction in Canada or in the United States of America, or in any other foreign jurisdiction, to give effect to this Order and to assist the Petitioners, the Monitor, and their respective agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Petitioners and to the Monitor, as an officer of this Court, as may be necessary or desirable to give effect to this Order, or to assist the Petitioners and the Monitor and their respective agents in carrying out the terms of this Order.
5. Endorsement of this Order by counsel appearing on this application other than counsel for the Petitioners is hereby dispensed with.

**THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER**

---

Signature of Kibben Jackson  
 Party  Lawyer for the Monitor

BY THE COURT

---

REGISTRAR



**Schedule "A"**

**List of Counsel**

<b>Name of Counsel</b>	<b>Party Representing</b>
Alexis Teasdale	Elevation Gold Mining Corporation, Eclipse Gold Mining Corporation, and Golden Vertex (Idaho) Corp
David Bish	Triple Flag Precious Metals Corp. Maverix Metals Inc.
Lance Williams Ashley Bowron	Patriot Gold Corp.
Vicki Tickle Tim Pinos	Nomad Royalty Company Limited
Robin Schwill	EG Acquisition LLC

**Schedule "B"**

**Greenwood Royalty Holders**

<b>Party</b>
<b>Melissa Gray Greenwood Morrow</b> 2502 Timberline Drive Austin, Texas 78746
<b>Amy Norquist Greenwood Hemingway</b> 6225 Piping Rock Lane Houston, Texas 77057
<b>Marvin Harris Greenwood</b> 4526 Ranch Road 1320 Johnson City, Texas 78636
<b>Lisa Greenwood Attaya</b> PO Box 4603 Wichita Falls, Texas 76308
<b>Greg Greenwood</b> 1207 Matthew Avenue Murray, Utah 84121
<b>Mary Grace Greenwood</b> 4141 S. Braedswood, Apt. 654 Houston, Texas 77025
<b>Nancy Levica Greenwood Riddle / Riddle Family Trust</b> 4246 Goodfellow Drive Dallas, Texas 75229-2814
<b>Andrew Peden Greenwood</b> 109 Timberwilde Lane Houston, Texas 77024
<b>Alexander William Greenwood</b> 170 Coats Circle, Pleasant Hill, CA 94523
<b>James Greenwood III</b> 1306 B Potomac Drive Houston, Texas 77057
<b>Corinna Carr Smith</b> 3904 Solomon Av, Napa, CA 94558

<b>Robert I. Carr, Jr.</b> 542 Heritage Ann Harbor, Michigan 48105-2156
<b>John D. Carr</b> 1932 S. Oneida St. Denver, Colorado 80224-2263
<b>Mary Carr Tilley</b> 714 Saddle Mountain Colorado Springs, Colorado 80919-2032
<b>James Carr</b> 32514 Waterworth Court Fulshear, Texas 77441-4366
<b>Pamela A. Greenwood</b> 2212 Mimosa Drive Houston, Texas 77019
<b>Marvin Nelson Greenwood</b> 18 North Callecita Laguna Beach, California 92651
<b>Mimi Ellis</b> 2206 Mimosa Drive Houston, Texas 77019
<b>John Greenwood</b> 3507 Cherry Lane Austin, Texas 78703
<b>Benjamin Fairfax Greenwood</b> 31881 National Park Drive Laguna Niguel, California 92677
<b>Joseph Harris Greenwood</b> 4917 Kirkcaldey Dr. Tyler, Texas 75703-2609
<b>Michael Nan Greenwood</b> 1901 Laurel Oaks Drive Richmond, Texas 77469
<b>"502 West 5<sup>th</sup> Street LLC" care of Todd Green</b> 513 West 5 <sup>th</sup> Tempe, AZ 85281
<b>Frances Elyse Tibbit</b> 8207 Durham Avenue Lubbock, Texas 79424

<b>Larry Himes (for Helen Snipes Himes)</b> PO Box 7, Silver City, New Mexico 88062
<b>LeaAnn Cogswell</b> 602 Palisado Avenue Windsor, Connecticut 06095
<b>Mindy Kammerdiener</b> PO Box 9806, Longview, TX 75608
<b>Melany D. Free</b> 13307 FM 225 South Laneville, Texas 75667-9648
<b>Peggy Lynn Allensworth</b> 11 El Arco Iris Drive, Roswell, New Mexico 88201
<b>Marsh Lee Snipes Melton</b> 138 Conley Place, Odessa, TX 79762
<b>William Joe Snipes</b> 2305 E. Pine Lodge Road, Roswell, NM 88201
<b>"BROOKS C. WILSON TRUST"</b> 3127 Dennis Avenue Clovis, California 93619 – 5103
<b>Barrie Lee Bliesner Perry Dugan</b> 15 Boulder Creek Court, Danville, CA 94526
<b>Mary Anderson Abell</b> 4608 Crestway Drive Austin, Texas 78731
<b>Burdine Anderson Giese</b> 219 Argyle Ave Alamo Heights, Texas 78209

## SCHEDULE "C"

### Greenwood Royalty Holders

<b>Party</b>
<b>Melissa Gray Greenwood Morrow</b> 2502 Timberline Drive Austin, Texas 78746
<b>Amy Norquist Greenwood Hemingway</b> 6225 Piping Rock Lane Houston, Texas 77057
<b>Marvin Harris Greenwood</b> 4526 Ranch Road 1320 Johnson City, Texas 78636
<b>Lisa Greenwood Attaya</b> PO Box 4603 Wichita Falls, Texas 76308
<b>Greg Greenwood</b> 1207 Matthew Avenue Murray, Utah 84121
<b>Mary Grace Greenwood</b> 4141 S. Braedswood, Apt. 654 Houston, Texas 77025
<b>Nancy Levica Greenwood Riddle / Riddle Family Trust</b> 4246 Goodfellow Drive Dallas, Texas 75229-2814
<b>Andrew Peden Greenwood</b> 109 Timberwilde Lane Houston, Texas 77024
<b>Alexander William Greenwood</b> 170 Coats Circle, Pleasant Hill, CA 94523
<b>James Greenwood III</b> 1306 B Potomac Drive Houston, Texas 77057
<b>Corinna Carr Smith</b> 3904 Solomon Av, Napa, CA 94558
<b>Robert I. Carr, Jr.</b> 542 Heritage Ann Harbor, Michigan 48105-2156



<p><b>John D. Carr</b>  1932 S. Oneida St.  Denver, Colorado 80224-2263</p>
<p><b>Mary Carr Tilley</b>  714 Saddle Mountain  Colorado Springs, Colorado 80919-2032</p>
<p><b>James Carr</b>  32514 Waterworth Court  Fulshear, Texas 77441-4366</p>
<p><b>Pamela A. Greenwood</b>  2212 Mimosa Drive  Houston, Texas 77019</p>
<p><b>Marvin Nelson Greenwood</b>  18 North Callecita  Laguna Beach, California 92651</p>
<p><b>Mimi Ellis</b>  2206 Mimosa Drive  Houston, Texas 77019</p>
<p><b>John Greenwood</b>  3507 Cherry Lane  Austin, Texas 78703</p>
<p><b>Benjamin Fairfax Greenwood</b>  31881 National Park Drive  Laguna Niguel, California 92677</p>
<p><b>Joseph Harris Greenwood</b>  4917 Kirkcaldey Dr.  Tyler, Texas 75703-2609</p>
<p><b>Michael Nan Greenwood</b>  1901 Laurel Oaks Drive  Richmond, Texas 77469</p>
<p><b>“502 West 5<sup>th</sup> Street LLC” care of Todd Green</b>  513 West 5<sup>th</sup>  Tempe, AZ 85281</p>
<p><b>Frances Elyse Tibbit</b>  8207 Durham Avenue  Lubbock, Texas 79424</p>
<p><b>Larry Himes (for Helen Snipes Himes)</b>  PO Box 7, Silver City,  New Mexico 88062</p>

<b>LeaAnn Cogswell</b> 602 Palisado Avenue Windsor, Connecticut 06095
<b>Mindy Kammerdiener</b> PO Box 9806, Longview, TX 75608
<b>Melany D. Free</b> 13307 FM 225 South Laneville, Texas 75667-9648
<b>Peggy Lynn Allensworth</b> 11 El Arco Iris Drive, Roswell, New Mexico 88201
<b>Marsh Lee Snipes Melton</b> 138 Conley Place, Odessa, TX 79762
<b>William Joe Snipes</b> 2305 E. Pine Lodge Road, Roswell, NM 88201
<b>"BROOKS C. WILSON TRUST"</b> 3127 Dennis Avenue Clovis, California 93619 – 5103
<b>Barrie Lee Bliesner Perry Dugan</b> 15 Boulder Creek Court, Danville, CA 94526
<b>Mary Anderson Abell</b> 4608 Crestway Drive Austin, Texas 78731
<b>Burdine Anderson Giese</b> 219 Argyle Ave Alamo Heights, Texas 78209