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12 *Attorneys for Patriot Gold Corp.*

13 **IN THE UNITED STATES BANKRUPTCY COURT**  
14 **FOR THE DISTRICT OF ARIZONA**

15 In re:  
16 ELEVATION GOLD MINING  
CORPORATION, *et al.*,  
17 Debtors in a Foreign Proceeding.

Proceedings Under Chapter 15  
Case No. 2:24-bk-06359-EPB  
(Jointly Administered)  
Case Nos. 2-24-bk-06364-EPB  
2-24-bk-06367-EPB  
2-24-bk-06368-EPB  
2-24-bk-06370-EPB  
2-24-bk-06371-EPB

**JOINT *EX PARTE* MOTION BY  
NOMAD ROYALTY COMPANY LTD.  
AND PATRIOT GOLD CORP. FOR  
ORDER EXTENDING DEADLINE TO  
RESPOND TO THE MOTION FOR  
RECOGNITION AND  
ENFORCEMENT OF CANADIAN  
SALE AND DISTRIBUTION ORDER**

**Hearing Date: December 23, 2024  
Hearing Time: 11:00 a.m.**

27 Nomad Royalty Company Ltd. ("Nomad") and Patriot Gold Corp. ("Patriot Gold"),  
28 hereby jointly move the Court on an *ex parte* basis for an order, substantially in the form

1 attached to the notice of lodging filed contemporaneously herewith as **Exhibit 1**,  
2 extending the deadline to respond to the *Motion for Recognition and Enforcement of*  
3 *Canadian Sale and Distribution Order* (the “Motion for Recognition”)<sup>1</sup> [Dkt. 110] to (i)  
4 5:00 p.m. (AZ time) on Friday, December 20, 2024, if the Canadian order is entered and  
5 received by undersigned counsel on December 19, 2024, or (ii) if the Canadian order is  
6 entered on December 20, 2024 or later, by 9:00 a.m. (AZ time) on Monday, December 23,  
7 2024, prior to the hearing on the Motion for Recognition. In support of this Motion,  
8 Nomad and Patriot Gold respectfully state as follows:

9 1. On December 5, 2024, KSV Restructuring Inc. (the “Monitor”) filed the  
10 Motion for Recognition in this Court, seeking entry of an order giving effect to the  
11 Canadian order in the United States.

12 2. On December 11, 2024, this Court held a preliminary hearing on the motion  
13 to expedite consideration of the Motion for Recognition.

14 3. At the hearing, the Court ordered that objections to Recognition Motion  
15 shall be filed by 5:00 p.m. on December 19, 2024 [Dkt. 120], on the assumption that the  
16 Canadian court’s order would be entered on December 17, 2024.

17 4. The Canadian sale hearing occurred on December 17, 2024. As of the filing  
18 of this Motion, however, no order has been entered by the Canadian court. Accordingly,  
19 Nomad and Patriot Gold are unable to prepare a substantive objection to recognition of the  
20 Canadian court’s order.

21 5. On December 19, 2024, at 10:28 a.m., counsel for Nomad informed the  
22 Monitor of the issue and inquired whether the Monitor would consent to an extension of  
23 time to file the objections.

24 6. On December 19, 2024, at 12:38 p.m., the Monitor consented to extend the  
25 time to object to 5:00 p.m. MST December 20, 2024. However, the Monitor did not, upon  
26 further inquiry, respond with any position on the proposed extension to 9:00 a.m. on

27 \_\_\_\_\_  
28 <sup>1</sup> All capitalized terms not defined herein shall have the same meaning as in the  
Motion for Recognition.

1 December 23, 2024 in the event that the Canadian order is entered and delivered to  
2 undersigned counsel on or after December 20, 2024. The joint movants respectfully  
3 submit that such deadline is appropriate under the circumstances.

4 7. Obviously, to the extent the Canadian order is not entered prior to the  
5 hearing currently scheduled for December 23, 2024, at 11:00 am, the parties will need to  
6 appear and discuss status and scheduling with the Court at that time.

7 WHEREFORE, Nomad and Patriot Gold respectfully request that this Court enter  
8 an order, substantially in the form attached to the notice of lodging filed  
9 contemporaneously herewith as **Exhibit 1**, extending the deadline to respond to the  
10 Motion for Recognition to (i) 5:00 p.m. (AZ time) on Friday, December 20, 2024, if the  
11 Canadian order is entered on December 19, 2024, or (ii) if the Canadian order is entered  
12 on or after December 20, 2024, by 9:00 a.m. (AZ time) on Monday, December 23, 2024.

13 RESPECTFULLY SUBMITTED this 19th day of December, 2024.

14 SNELL & WILMER L.L.P.

15 By: /s/James G. Florentine

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