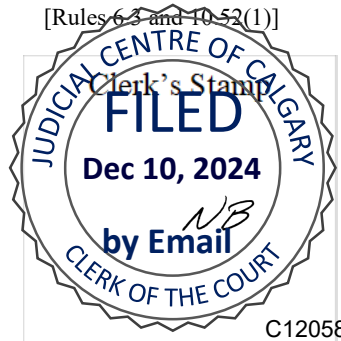


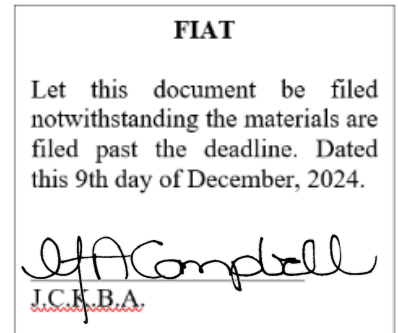
COURT FILE NUMBER B301-135903
COURT COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY



IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ERIKSON NATIONAL ENERGY INC.

DOCUMENT **APPLICATION FOR A RESTRICTED COURT ACCESS ORDER**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
Fasken Martineau DuMoulin LLP
Barristers and Solicitors
3400 First Canadian Centre
350 – 7th Avenue SW
Calgary, Alberta T2P 3N9



Attention: Robyn Gurofsky / Jessica Cameron
Phone: (403) 261-9469 / (403) 261-9468
Email: rgurofsky@fasken.com / jcameron@fasken.com

File Number: 267908.00025

NOTICE TO RESPONDENTS LISTED AT SCHEDULE “A” ATTACHED HERETO

This application is made against you. You are a respondent.

You have the right to state your side of this matter before the judge.

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

Date	December 9, 2024
Time	2:00 pm
Where	https://albertacourts.webex.com/meet/virtual.courtroom60
Before Whom	The Honourable Justice G.A. Campbell

Go to the end of this document to see what else you can do and when you must do it.

Remedy claimed or sought:

1. All capitalized terms used but not otherwise defined herein shall have the meanings given to them in the Third Report of the Proposal Trustee, dated December 6, 2024 (the “**Third Report**”).

2. The Applicant, KSV Restructuring Inc. in its capacity as the “**Proposal Trustee**” in the within proceedings, seeks a restricted court access order substantially in the form attached hereto as **Schedule “B”** (the “**Sealing Order**”):
 - (a) sealing Confidential Appendix “1” to the Third Report; and
 - (b) granting such further and other relief as may be sought by the Proposal Trustee and this Honourable Court may deem appropriate.

Grounds for making this application:

3. The Proposal Trustee seeks a Sealing Order over Confidential Appendix “1” to the Third Report on the basis that it contains a copy of an alternative offer received by the Company pursuant to the Court-approved sale and investment solicitation process (“**SISP**”) conducted for sale of Erikson’s assets in the within proceedings.
4. Confidential Appendix “1” contains confidential and commercially sensitive information about the SISP and the bids received as part of that process. If such information is made publicly available prior to the closing of a transaction or transactions for the assets of Erikson under the SISP, then the value of such transaction(s) could be detrimentally impacted. In the event that a transaction or transactions do not close, disclosure of the information contained in Confidential Appendix “1” could unduly hinder any future efforts taken by Erikson or the Proposal Trustee to remarket Erikson’s assets in these proceedings or any other insolvency processes.
5. Sealing Confidential Appendix “1” is the least restrictive method available to prevent the dissemination of confidential and commercially sensitive information. The salutary effects of the Sealing Order, which are to protect the general commercial interest of maintaining confidentiality and commercially sensitive information, far outweigh the deleterious effects of restricting the accessibility of court proceedings. Further, the effects of the Sealing Order will be time limited to the closing of any transaction(s) for substantially all of Erikson’s assets as part of any type of insolvency proceedings, or upon further Order of this Court.

6. Such further and other grounds as counsel may advise and this Honourable Court may permit.

Material or evidence to be relied on:

7. Third Report of the Proposal Trustee, dated December 6, 2024.
8. Any other materials and pleadings previously filed in the within proceedings.
9. Such further and other material or evidence as counsel may advise and this Honourable Court permits.

Applicable rules:

10. *Alberta Rules of Court*, AR 124/2010, in particular Part 6, Division 4.
11. *Bankruptcy and Insolvency General Rules*, CRC, c 368.
12. Such further and other rules as counsel may advise and this Honourable Court permits.

Applicable Acts and regulations:

13. *Bankruptcy and Insolvency Act*, RSC 1985, c B-3.
14. Such further and other legislation as counsel may advise and this Honourable Court permits.

Any irregularity complained of or objection relied on:

15. None.

How the application is proposed to be heard or considered:

16. The Proposal Trustee proposes that this Application be heard before the Honourable Justice G.A. Campbell on December 9, 2024, at 2:00 p.m. sitting on the Commercial List, via WebEx video conference, which appearance has been scheduled with the Commercial Coordinator, on affidavit evidence with some or all of the parties present.

WARNING

If you do not come to Court either in person or by your lawyer, the Court may give the applicant 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"
SERVICE LIST

IN THE MATTER OF THE BANKRUPTCY AND INSOLVENCY ACT, R.S.C. 1985, c. B-3, as amended AND IN THE MATTER OF ERIKSON NATIONAL ENERGY INC.

**SERVICE LIST
(December 3, 2024)**

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<p>Core Integrity Inc</p>	

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Tallahassee Resources Inc. 401 9 Ave SW Suite#1910 Calgary, AB T2P 3C5 Amna Khawaja - Amna.khawaja@Tallah.ca – EMIAL DOES NOT WORK	Storm Resources Ltd. PO Box 1420 Station M Calgary, AB T2P 2L6
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SCHEDULE "B"
FORM OF SEALING ORDER

IT IS HEREBY ORDERED AND DECLARED THAT

SERVICE

1. Service of notice of this Application and materials in support of this Order is hereby declared good and sufficient, and the time for service of this Application and supporting materials is hereby abridged to the time actually given and this Application is properly returnable today.

RESTRICTED COURT ACCESS

2. Confidential Appendix “1” to the Third Report shall immediately be sealed by the Clerk of the Court, kept confidential and shall not form part of the public record, and not be available for public inspection until the earlier of: i) closing of a transaction or transactions for substantially all of the assets of Erikson as part of any type of insolvency proceedings; ii) December 9, 2026; or, iii) unless otherwise ordered by this Court.
3. Confidential Appendix “1” to the Third Report shall be sealed and filed in an envelope containing the following statement thereon:

THIS ENVELOPE CONTAINS CONFIDENTIAL APPENDIX “1” TO THE THIRD REPORT OF THE PROPOSAL TRUSTEE, DATED DECEMBER 6, 2024, WHICH SHALL BE SEALED ON THE COURT RECORD AND IS NOT TO BE PLACED ON THE PUBLIC RECORD OR MADE PUBLICLY ACCESSIBLE UNTIL THE EARLIER OF: I) THE CLOSING OF A TRANSACTION OR TRANSACTIONS FOR SUBSTANTIALLY ALL OF THE ASSETS OF ERIKSON NATIONAL ENERGY INC. AS PART OF ANY TYPE OF INSOLVENCY PROCEEDINGS; II) DECEMBER 9, 2026; OR III) UNTIL FURTHER ORDER OF THIS COURT.

4. The Proposal Trustee may share Confidential Appendix “1” to the Third Report with any party who enters into a confidentiality agreement with the Proposal Trustee in a form satisfactory to the Proposal Trustee in its sole discretion.

5. In the event an interested party wishes to unseal the contents of Confidential Appendix “1” to the Third Report, such interested party may bring an application to Court in the within proceedings on no less than 7 days’ notice to the Proposal Trustee, Erikson, and Sayer.
6. Service of this Order shall be deemed good and sufficient by serving the same on:
 - a. the persons listed on the service list created in these proceedings;
 - b. any other person served with notice of the Application for this Order;
 - c. any other parties attending or represented at the Application for this Order; and
 - d. posting a copy of this Order on the Proposal Trustee’s website at:
<https://www.ksvadvisory.com/experience/case/erikson>,

and service on any other person is hereby dispensed with.

7. Service of this Order may be effected by facsimile, electronic mail, personal delivery, or courier. Service is deemed to be effected the next business day following transmission or delivery of this Order.

Justice of the Court of King’s Bench of Alberta