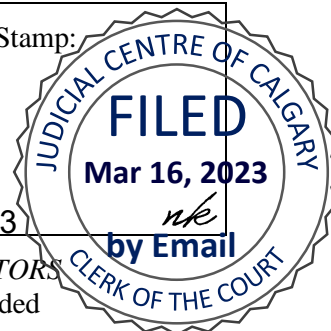


COURT FILE NUMBER 2301-03179
 COURT COURT OF KING'S BENCH OF ALBERTA
 JUDICIAL CENTRE CALGARY
 PROCEEDING IN THE MATTER OF THE *COMPANIES' CREDITORS' ARRANGEMENT ACT*, RSC 1985, c C-36, as amended

Clerk Stamp:

\$50.00
 COM
 March 16, 2023



ENTERED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF DYNAMIC TECHNOLOGIES GROUP INC., DYNAMIC ATTRACTIONS LTD., DYNAMIC ENTERTAINMENT GROUP LTD., DYNAMIC STRUCTURES LTD. and DYNAMIC ATTRACTIONS INC.

DOCUMENT **APPLICATION FOR RESTRICTED COURT ACCESS ORDER**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

Burnet, Duckworth & Palmer LLP
 2400, 525 - 8 Avenue SW
 Calgary, Alberta T2P 1G1
 Lawyer: David LeGeyt / Ryan Algar
 Phone Number: (403) 260-0210 / 0126
 Fax Number: (403) 260-0332
 Email address: dlegeyt@bdplaw.com / ralgar@bdplaw.com
 File no.: 75459-2

NOTICE TO RESPONDENT: See Service List attached as Schedule "A" to this Application

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

You have the right to state your side of the matter before a master/judge.

The application will be heard as shown below:

DATE: March 16, 2023
TIME: 2:00 p.m.
WHERE: Edmonton Courts Centre – VIA WEBEX
BEFORE WHOM: The Honourable Justice D.R. Mah

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. FTI Consulting Canada Inc., in its capacity as court appointed monitor ("**Monitor**") of Dynamic Technologies Inc., Dynamic Attractions Ltd., Dynamic Entertainment Group Ltd., Dynamic Structures Ltd. and Dynamic Attractions Inc. (collectively the "**Debtors**") respectfully seeks an Order substantially in the form attached as **Schedule "B"**:
 - (a) declaring that the time for service of this Application and supporting materials is valid, that the time therefore be abridged to the time actually given, that this Application is properly returnable today, and that further service of the Application is dispensed with;
 - (b) sealing on the Court file the Confidential Supplement (the "**Confidential Supplement**") to the First Report of the Monitor dated March 15, 2023 (the "**First Report**"); and
 - (c) such further and other relief, advice and directions as counsel may advise and this Honourable Court may deem just and appropriate.

Grounds for making this Application:

2. On March 9, 2023, the Debtors were granted an initial order under the *Companies' Creditors Arrangement Act*, RSC 1985, c C-36 (the "**CCAA**").
3. On March 16, 2023, the Debtors will seek further relief from this Honourable Court under the CCAA, including the approval of a sale and investment solicitation process (the "**SISP**") to be implemented by the Monitor.
4. The Monitor has prepared the First Report and the Confidential Supplement to inform stakeholders and this Honourable Court in respect of the proposed SISP.

Sealing Order

5. The Confidential Supplement contains matters of a sensitive commercial nature, including the criteria upon which the Monitor will assess bids submitted pursuant to the SISP to determine if such bids may qualify as a "**High Value LOI**" as defined in the SISP (the "**Confidential Information**").
6. The publication or dissemination of the Confidential Information could result in harm to the SISP, the Debtors, and the Debtor's stakeholders in these proceedings.
7. The Order sought is the least restrictive and least prejudicial alternative to prevent the dissemination of the Confidential Information, and it is fair and just in the circumstances to restrict public access to the Confidential Information.

Material or evidence to be relied on:

8. All pleadings and proceedings filed in the within action, including the First Report of the Monitor dated March 15, 2023, and the Confidential Supplement thereto.
9. The proposed form of Order.

10. The inherent jurisdiction of this Honourable Court to control its own process.
11. Such further and other material and evidence as counsel may advise and this Honourable Court may permit.

Applicable rules:

12. Rules 1.3, 6.3(1), 6.29, 6.47(e) and (f), 6.9(1)(a), 11.27, 11.29, 13.5, and such further and other Rules as counsel may advise and that this Honourable Court may permit.

Applicable Acts and regulations:

13. The CCAA, as amended, and such other Rules, Acts and Regulations as counsel may advise and that this Honourable Court may permit.

Any irregularity complained of or objection relied on:

14. None.

How the Application is proposed to be heard or considered:

15. Before Justice D.R. Mah on the Commercial List, via Webex.

AFFIDAVIT EVIDENCE IS REQUIRED IF YOU WISH TO OBJECT.

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 materials to the Applicant.

SCHEDULE "A"

Service List

See Attached

COURT FILE NUMBER 2301-03179

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

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

DEFENDANT AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF DYNAMIC TECHNOLOGIES GROUP INC., DYNAMIC ATTRACTIONS LTD., DYNAMIC ENTERTAINMENT GROUP LTD., DYNAMIC STRUCTURES LTD., and DYNAMIC ATTRACTIONS INC.

DOCUMENT **SERVICE LIST**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

Burnet, Duckworth & Palmer LLP
 2400, 525 – 8 Avenue SW
 Calgary, Alberta T2P 1G1
 Lawyer: David LeGeyt / Ryan Algar
 Phone Number: (403) 260-0210 / (403) 260-0126
 Fax Number: (403) 260-0332
 Email Address: dlegeyt@bdplaw.com / ralgar@bdplaw.com
 File No. 75459-2

SERVICE LIST

Updated: March 15, 2023

PARTY	COUNSEL
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<p>SACO Technologies Inc.</p> <p>Martin Sennott Email: msennott@boughtonlaw.com</p>	

PARTY	COUNSEL
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<p>De Lage Landen Financial Services Inc. 1111 Old Eagle School Road Wayne, PA US 19087</p> <p>Fax: 1-800-347-3936</p>	
<p>Royal Bank of Canada 36 York Mills Road, 4th Floor Toronto, Ontario M2P 0A4</p> <p>Royal Bank of Canada 180 Wellington St W 3rd Floor Toronto, Ontario M5J 1J1</p> <p>Email: torbscpr@rbc.com</p>	
<p>RCAP Leasing Inc. 5575 North Service Rd, Suite 300 Burlington, Ontario L7L 6M1</p> <p>Fax: (800) 436-0884 Email: csc@rcapleasing.com</p>	
<p>Meridian Onecap Credit Corp. Suite 1500, 4710 Kingsway Burnaby, British Columbia V5H 4M2</p> <p>Email: absecparties@avssystems.ca MOCC_Brandt@meridianonecap.ca</p> <p>Fax: (604) 646-2222 / (866) 687-7091</p>	

PARTY	COUNSEL
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<p>Receivables Management Office 1802 Douglas Street, 6th Floor Victoria, British Columbia V8T 4K6</p> <p>Mailing Address PO Box 9445 Station Prov Govt Victoria, British Columbia V8W 9V5</p> <p>Laura Cruz Email: Laura.Cruz@gov.bc.ca</p> <p>Fax: 1-250-356-1090</p>	

SCHEDULE "B"

Draft Restricted Court Access Order

See Attached

COURT FILE NUMBER 2301-03179
COURT COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY

IN IN THE MATTER OF THE *COMPANIES' CREDITORS*
ARRANGEMENT ACT, RSC 1985, c C-36, as amended

AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF DYNAMIC TECHNOLOGIES GROUP INC.,
DYNAMIC ATTRACTIONS LTD., DYNAMIC ENTERTAINMENT
GROUP LTD., DYNAMIC STRUCTURES LTD., and DYNAMIC
ATTRACTIONS INC.

DOCUMENT **ORDER (Restricted Court Access)**

ADDRESS FOR SERVICE **Burnet, Duckworth & Palmer LLP**
AND CONTACT 2400, 525 - 8 Avenue SW
INFORMATION OF PARTY Calgary, Alberta T2P 1G1
FILING THIS DOCUMENT Lawyer: David LeGeyt / Ryan Algar
Phone Number: (403) 260-0210 / 0126
Fax Number: (403) 260-0332
Email address: dlegeyt@bdplaw.com / ralgar@bdplaw.com
File no.: 75459-2

DATE ON WHICH ORDER WAS PRONOUNCED: March 16, 2023
LOCATION WHERE ORDER WAS PRONOUNCED: Edmonton, Alberta
NAME OF JUSTICE WHO MADE THIS ORDER: The Honourable Justice D.R. Mah

UPON the application (the "**Application**") of FTI Consulting Canada Inc. (the "**Monitor**"), in its capacity as court appointed Monitor of Dynamic Technologies Inc., Dynamic Attractions Ltd., Dynamic Entertainment Group Ltd., Dynamic Structures Ltd., and Dynamic Attractions Inc.;

AND UPON having read the Application and the First Report of the Monitor dated March 15, 2023 (the "**First Report**"); **AND UPON** hearing from counsel for the Monitor and any other parties present;

IT IS HEREBY ORDERED AND DECLARED THAT:

1. Capitalized terms not otherwise defined in this Order have the meaning set forth in the First Report.

Service

2. Service of the Application and First Report is hereby validated and deemed good and sufficient, the time therefore is abridged to the time actually given, the Application is properly returnable today, and no person other than those persons served is entitled to service of the of the Application.

Sealing of Confidential Information

3. The Confidential Supplement shall be sealed on the Court file and shall not form part of the public record, notwithstanding Division 4, Part 6 of the *Alberta Rules of Court*.
4. The Confidential Supplement shall be sealed until the Monitor files a Monitor's Certificate with the Clerk of the Court substantially in the form attached as **Schedule "A"** hereto, confirming that the SISF has been completed to the satisfaction of the Monitor.
5. The Clerk of this Honourable Court shall file the First Report including the Confidential Supplement in a sealed envelope attached to a notice that sets out the style of cause of these proceedings and states that:

THIS ENVELOPE CONTAINS CONFIDENTIAL MATERIALS FILED BY FTI CONSULTING CANADA INC., IN ITS CAPACITY AS THE COURT-APPOINTED MONITOR IN THESE PROCEEDINGS. THE CONFIDENTIAL MATERIALS ARE SEALED PURSUANT TO THE SEALING ORDER ISSUED BY THE HONOURABLE JUSTICE D.R. MAH ON MARCH 16, 2023.

Service of Order

6. Service of this Order shall be deemed good and sufficient by serving the same on:
 - (a) the persons listed on the service list maintained in the within action; and

- (b) by posting a copy of this Order on the Monitor's website established in connection with these proceedings.

J.C.K.B.A.

SCHEDULE "A"

Monitor's Certificate

See Attached

Monitor's Certificate

COURT FILE NUMBER 2301-03179
COURT COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY

IN IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, RSC 1985, c C-36, as amended

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF DYNAMIC TECHNOLOGIES GROUP INC., DYNAMIC ATTRACTIONS LTD., DYNAMIC ENTERTAINMENT GROUP LTD., DYNAMIC STRUCTURES LTD., and DYNAMIC ATTRACTIONS INC.

DOCUMENT **Monitor's Certificate**

ADDRESS FOR SERVICE **Burnet, Duckworth & Palmer LLP**
AND CONTACT 2400, 525 - 8 Avenue SW
INFORMATION OF PARTY Calgary, Alberta T2P 1G1
FILING THIS DOCUMENT Lawyer: David LeGeyt / Ryan Algar
Phone Number: (403) 260-0210 / 0126
Fax Number: (403) 260-0332
Email address: dlegeyt@bdplaw.com / ralgar@bdplaw.com

File no.: 75459-2

RECITALS

- A. Pursuant to an Order of the Court of King's Bench of Alberta (the "**Court**") dated March 9, 2023, FTI Consulting Canada Inc. was appointed as the monitor (the "**Monitor**") of Dynamic Technologies Group Inc., Dynamic Attractions Ltd., Dynamic Entertainment Group Ltd., Dynamic Structures Ltd. and Dynamic Attractions Inc. (the "**Debtors**").
- B. Pursuant to an Order of the Court dated March 16, 2023, the Court granted an Order sealing on the Court file the Confidential Supplement to the First Report of the Monitor dated March 15, 2023 (the "**First Report**").
- C. Unless otherwise indicated herein, capitalized terms have the meanings set out in the First Report.

THE MONITOR CERTIFIES the following:

1. The SISP has concluded to the satisfaction of the Monitor.

**FTI CONSULTING CANADA INC.,
in its capacity as the court-appointed
Monitor of the Debtors and not in its
personal or corporate capacity.**

Per: _____

Name:

Title: