

COURT FILE NUMBER 2401-02680

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

IN THE MATTER OF THE COMPANIES' CREDITORS
ARRANGEMENT ACT, R.S.C. 1985, c. C-36, May 20, 2025

AND IN THE MATTER OF THE PLAN OF COMPROMISE
OR ARRANGEMENT OF 2669337 ALBERTA LTD.

APPLICANT SABRE ENERGY PARTNERSHIP, SABRE ENERGY LTD.
and SABRE OIL AND GAS LTD.

RESPONDENT 2669337 ALBERTA LTD.

DOCUMENT **APPLICATION BY SABRE ENERGY PARTNERSHIP,
SABRE ENERGY LTD. and SABRE OIL AND GAS LTD.**

ADDRESS FOR SERVICE AND CONTACT
INFORMATION OF PARTY
FILING THIS DOCUMENT SABRE ENERGY LTD.
800, 1122 – 4 Street SW
Calgary, Alberta T2R 1M1

Attention: Sam Smith and Phillip LaFlair

Telephone No.: 403-266-3626

Fax No.: 403-262-3867

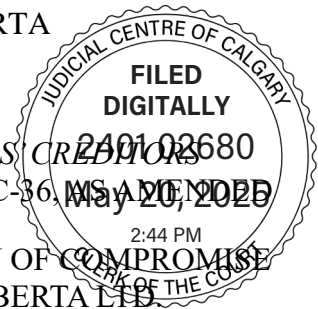
Email: ssmith@sabre-energy.com

plaflair@sabre-energy.com

NOTICE TO THE RESPONDENT:

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

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



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

Date:	June 24, 2025
Time:	10:00 am or so soon thereafter as counsel may be heard
Where:	Calgary Courts Centre
Before Whom:	Justice Armstrong

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. Sabre Energy Partnership, Sabre Energy Ltd. and Sabre Oil and Gas Ltd. (collectively “Sabre”) hereby requests:
 - (a) A declaration that Razor/266937 Alberta Ltd. held/holds in trust an amount equal to the amounts of certain Gas Cost Allowance Credits transferred by Sabre to Razor; and,
 - (b) A declaration that Sabre’s Proof of Claim, as rejected by the Monitor, be allowed.

Grounds for making this application:

2. Razor/ 266937 Alberta Ltd. agreed to hold/ holds amounts equal to Gas Cost Allowance Credits transferred to Razor by Sabre in a form of trust, constructive trust or implied trust on behalf of Sabre.

Material or evidence to be relied on:

3. The Applicants intend to rely upon the following materials:
 - (a) Affidavit of Sam Smith, sworn on May 20, 2025;
 - (b) Memorandum of Argument to be filed; and
 - (c) such further and other evidence or materials as counsel for the Applicants may advise and this Honourable Court may permit.

Applicable rules:

4. (a) *The Alberta Rules of Court*, Alta Reg. 124/2010; and
(b) such further and other rules as counsel for the Applicants may advise.

Applicable Acts and regulations:

5. (a) *Companies' Creditors Arrangement Act*, RSC 1985, c. C-36; and
(b) such further and other acts and regulations as counsel for the Applicants may advise.

Any Irregularity Complained of or Objection Relied On:

6. There are no irregularities complained of, or objections relied on.

How the Application is Proposed to be Heard or Considered:

7. Counsel for the Applicants proposes that the Application be heard in person, before the Honourable Justice Armstrong at the Calgary Law Courts, 601 5 St SW, Calgary, AB, at 10:00 a.m. on June 24, 2025, or so soon thereafter as counsel may be heard.

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.