COURT FILE NUMBER	2601-07148
COURT	COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE	CALGARY
	IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, RSC 1985, c C-36, as amended AND IN THE MATTER OF THE PLAN OF COMPROMISE OR ARRANGEMENT OF MONETTE FARMS LTD., MONETTE FARMS ONTARIO CORP., NEXGEN SEEDS LTD., MONETTE PRODUCE LTD., MONETTE SEEDS LTD., MONETTE LAND CORP., DMO HOLDINGS LTD., DMO HOLDINGS USA, INC., MONETTE SEEDS USA, LLC, MONETTE FARMS ARIZONA, LLC, MONETTE FARMS USA, INC., 1012595 DE INC., MONETTE PRODUCE, LLC, GOAT'S PEAK WINERY LTD., MONETTE FARMS BC LTD., MONETTE FARMS LAND GP LTD., MONETTE FARMS LAND II GP LTD., AND MONETTE FARMS BC GP LTD.
APPLICANTS	MONETTE FARMS LTD., MONETTE FARMS ONTARIO CORP., NEXGEN SEEDS LTD., MONETTE PRODUCE LTD., MONETTE SEEDS LTD., MONETTE LAND CORP., DMO HOLDINGS LTD., DMO HOLDINGS USA, INC., MONETTE SEEDS USA, LLC, MONETTE FARMS ARIZONA, LLC, MONETTE FARMS USA, INC., 1012595 DE INC., MONETTE PRODUCE, LLC, GOAT'S PEAK WINERY LTD., MONETTE FARMS BC LTD., MONETTE FARMS LAND GP LTD., MONETTE FARMS LAND II GP LTD., AND MONETTE FARMS BC GP LTD.
DOCUMENT	**APPLICATION**

Clerk's Stamp



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File No.: 063030-01

Attention: Jeffrey Oliver / Danielle Maréchal / Matteo Clarkson-Maciel

NOTICE TO THE RESPONDENTS: see Service List attached hereto as Schedule "A"

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

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

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

Date: November 10, 2026
Time: 2:00 P.M.
Where: Calgary Courts Centre - Webex
https://albertacourts.webex.com/meet/virtual.courtroom60
Before: The Honourable Justice D.R. Mah

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

Remedy claimed or sought:

1. The applicants, Monette Farms Ltd. ("**Monette Farms**"), Monette Land Corp. ("**Monette Land**"), DMO Holdings Ltd. ("**DMO Holdings**"), Goat's Peak Winery Ltd. ("**Goat's Peak Winery**"), Monette Farms BC Ltd. ("**Monette Farms BC**"), Monette Farms Ontario Corp. ("**MFO**"), Nexgen Seeds Ltd. ("**Nexgen**"), Monette Produce Ltd. ("**Produce**"), Monette Seeds Ltd. ("**Seeds**"), Monette Farms Land GP Ltd. ("**MFL GP**"), Monette Farms Land II GP Ltd. ("**MFL II GP**"), DMO Holdings USA, Inc. ("**DMO USA**"), Monette Seeds USA LLC ("**Seeds USA**"), Monette Farms Arizona, LLC ("**MF Arizona**"), Monette Farms USA, Inc. ("**Monette USA**"), 1012595 DE INC. ("**1012595**"), Monette Produce, LLC ("**Produce USA**"), and Monette Farms BC GP Ltd. ("**MF BC GP**", and collectively the "**Applicants**"), bring this application (the "**Application**") for, among other things:

    a. an order (the "**Stay Extension Order**"), pursuant to the *Companies' Creditors Arrangement Act,* RSC 1985, c C-36 (the "**CCAA**"), substantially in the form attached hereto as Schedule "B", among other things:

        i. if necessary, abridging the time for service and deeming service of the Application and supporting materials to be good and sufficient; and

        ii. extending the Stay Period (as defined in the Amened and Restated Initial Order granted by the Honourable Justice M.H. Borque on May 1, 2025 (the "**ARIO**")) from November 13, 2026, up to and including November 25, 2026, or such other date this Honourable Court deems appropriate (the "**Stay Extension**"); and

b. such further and other relief as this Honourable Court deems just.

Grounds for making this application:

2. All capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the ARIO or the Fifth Affidavit of Darrel Noel Monette, sworn November 2, 2026, (the "**Fifth Monette Affidavit**"), as applicable.

3. On April 21, 2026, the Applicants obtained protection from their creditors under the CCAA pursuant to an initial order (the "**Initial Order**") of the Court of King's Bench of Alberta (the "**Court**"). The ARIO was pronounced on May 1, 2026, which, among other things:

   a. appointed FTI Consulting Canada Inc. ("**FTI**") as the monitor (in such capacity, the "**Monitor**") of the Group's (as defined herein) assets, undertakings and properties (collectively, the "**Property**"), the Group's business (the "**Business**"), and financial affairs of the Group in these CCAA proceedings;

   b. declared that Monette Farms Land LP, Monette Farms Land II LP, and Monette Farms BC LP (collectively, the "**Non-Applicant Stay Parties**", and together with the Applicants, the "**Group**") shall have the same benefits and the same protections and authorizations provided to the Applicants in the ARIO and all of their property and business shall be deemed to be included within the Property and Business of the Applicants, notwithstanding that the Non-Applicant Stay Parties are not "companies" within the meaning of the CCAA;

   c. stayed all claims, proceedings and remedies taken or that might be taken in respect of the Group, the Property, the Business, the Monitor, and either of their respective directors and officers, except with leave of the Court, until June 19, 2026;

   d. granted a charge in favour of the Monitor, its counsel and the Syndicate's Financial Advisor for professional fees incurred up to the amount of $1,500,000 (the "**Administration Charge**") in priority to any and all other hypothecs, mortgages, liens, security interests, priorities, charges, encumbrances or other lien of whatever nature against the Property;

   e. authorized the Group to carry on business in a manner consistent with the preservation of the Business and Property; and

   f. approved a debtor-in-possession ("**DIP**") financing facility (the "**DIP Facility**") provided by The Bank of Nova Scotia in its capacity as DIP agent (the "**DIP Agent**") and the members of the Syndicate (in such capacity, the "**DIP Lenders**"), authorized the Group

to borrow from the DIP Lenders a maximum amount of $90 million, in accordance with the terms of the Term Sheet (as defined in the ARIO) and created a related $95 million charge to secure the DIP Facility (the "**DIP Lenders' Charge**") in priority to any and all other hypothecs, mortgages, liens, security interests, priorities, charges, encumbrances or other lien of whatever nature against the Property except for the Administration Charge.

4. On June 12, 2026, the Court granted the following orders:

    a. an order (the "**SISP Approval Order**") which, among other things:

        i. approved the sale and investment solicitation process (the "**SISP**"); and

        ii. authorizing and empowering the Applicants and Monitor to implement the SISP and to perform all steps and actions required to them pursuant to the SISP; and

    b. an order extending the Stay Period to June 13, 2026.

5. On October 15, 2026, the Monitor, following consultation with the Group and the DIP Agent, extended SISP milestones pursuant to paragraphs 16, 53, and 54 of the SISP. The Binding Bid Deadline was extended to November 3, 2026, and the SISP Termination Date was extended to 12 pm (MT) on December 4, 2026.

6. The Group continues to pursue a restructuring pursuant to the SISP and requires an extension of the stay to conclude the SISP and pursue implementation of any Successful Bids.

Chapter 15 Case

7. On April 21, 2026, the Monitor, as foreign representative of the Group (in such capacity, the "**Foreign Representative**"), initiated proceedings in the United States Bankruptcy Court for the District of Delaware (the "**US Bankruptcy Court**") under chapter 15 of Title 11 of the United States Bankruptcy Code (the "**Bankruptcy Code**"), on behalf of the Group (the "**Chapter 15 Case**").

8. On April 24, 2026, the US Bankruptcy Court entered an order, among other things, provisionally recognizing the Initial Order, granting liens under the Bankruptcy Code on the Applicants' property located in the United States for the benefit of the DIP Lenders, and recognizing the Monitor as Foreign Representative.

9. On May 13, 2026, the US Bankruptcy Court granted an order under the Bankruptcy Code which, among other things, (a) recognized the Monitor as Foreign Representative, (b) recognized this CCAA proceeding as a foreign main proceeding pursuant to sections 1515, 1517 and 1520 of the

Bankruptcy Code, and (c) recognized and enforced the Initial Order and ARIO in the US (the "**Recognition Order**").

10. Pursuant to the SISP and SISP Approval Order, all sales of property located in the United States require approval of the US Bankruptcy Court, in addition to any applicable approval of this Court. Accordingly, following the granting of the Arizona SAVO, the Monitor, as Foreign Representative, will seek recognition of the Arizona SAVO and such further relief as may be required from the US Bankruptcy Court to approve and implement the Arizona Transaction in the Chapter 15 Case.

11. Pursuant to the SISP, the Group designated a bid made on certain Arizona property as a Successful Bid and entered into a purchase and sale of those assets on August 12, 2026 (the "**Arizona PSA**"). The proposed Arizona PSA (the "**Arizona Transaction**") was approved by the Court on August 19, 2026. Such approval was subject to approval by the US Bankruptcy Court. On September 29, 2026, the US Bankruptcy Court granted an order approving the Arizona Transaction. The Arizona Transaction has is anticipated to close imminently following completion of certain outstanding post-closing steps.

RELIEF SOUGHT

Stay Extension Order

12. The Stay Period expires on November 13, 2026.

13. The Applicants are seeking to extend the Stay Period to and including November 25, 2026, or such later date as this Court may order. The Stay Extension is necessary and appropriate in the circumstances to provide the Group with the time required to: (i) continue with the growing and harvesting season without any disruption of enforcement obligations; (ii) attend to all matters required with respect to closing the Arizona Transaction; and (iii) assist the Monitor with the continuation and conclusion of the SISP.

14. Since the granting of the ARIO, the Group has acted and is continuing to act in good faith and with due diligence in these CCAA proceedings.

15. With the continued use of the Cash Management System and DIP Facility, the Group has sufficient liquidity to operate through the proposed Stay Extension, as demonstrated by the Cash Flow Projection.

16. The Group and their stakeholders will benefit from the Stay Extension.

FURTHER GROUNDS

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

Material or evidence to be relied on:

18. Amended and Restated Initial Order granted by the Honourable Justice M.H. Bourque on May 1, 2026;

19. Order re Stay Extension granted by the Honourable Justice R.W. Armstrong on June 12, 2026;

20. Fifth Affidavit of Darrel Noel Monette, sworn November 2, 2026, to be filed;

21. Fourth Report of the Monitor, to be filed; and

22. such further and other materials and evidence as counsel may advise and this Honourable Court may permit.

Applicable Acts and regulations:

1. *Companies' Creditors Arrangement Act*, RSC 1985, c C-36, as amended;

2. *Bankruptcy and Insolvency Act*, RSC 1985, c B-3;

3. *Personal Property Security Act*, SS 1993, c P-6.2 (Saskatchewan);

4. *Personal Property Security Act*, RSA 2000, c P-7 (Alberta);

5. *Personal Property Security Act*, CCSM, c P35 (Manitoba);

6. *Personal Property Security Act*, RSBC 1996, c 359 (British Columbia);

7. *Land Titles Act*, SS 2000 c L-51 (Saskatchewan);

8. *Land Titles Act*, RSBC 1996, c 250 (British Columbia);

9. *Real Property Act*, CCSM c. R30 (Manitoba);

10. Bankruptcy and Insolvency General Rules, CRC, c 368;

11. *Alberta Rules of Court,* Alta. Reg. 124/2010, including Part 3, Division 2, Subdivision 1, rules 1.2, 1.3, 3.2(2)(d), 3.8, 6.3(1), 6.9, 11.27 and 13.5; and

12. such further and other Acts and regulations as counsel may advise and this Honourable Court may permit.

WARNING

You are named as a respondent because you have made or are expected to make an adverse claim in respect of this originating application. If you do not come to Court either in person or by your lawyer, the

Court may make an order declaring you and all persons claiming under you to be barred from taking any further proceedings against the applicant(s) and against all persons claiming under the applicant(s). You will be bound by any order the Court makes, or another order might be given or other proceedings taken which the applicant(s) is/are entitled to make without any further notice to you. If you want to take part in the application, you or your lawyer must attend in Court on the date and at the time shown at the beginning of this form. If you intend to give evidence in response to the application, you must reply by filing an affidavit or other evidence with the Court and serving a copy of that affidavit or other evidence on the applicant(s) a reasonable time before the application is to be heard or considered.

COURT FILE NUMBER	2601-07148
COURT	COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE	CALGARY
	IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, RSC 1985, c C-36, as amended AND IN THE MATTER OF THE COMPROMISE OR PLAN OF ARRANGEMENT OF MONETTE FARMS LTD., MONETTE FARMS ONTARIO CORP., NEXGEN SEEDS LTD., MONETTE PRODUCE LTD., MONETTE SEEDS LTD., MONETTE LAND CORP., DMO HOLDINGS LTD., DMO HOLDINGS USA, INC., MONETTE SEEDS USA, LLC, MONETTE FARMS ARIZONA, LLC, MONETTE FARMS USA, INC., 1012595 DE INC., MONETTE PRODUCE, LLC, GOAT'S PEAK WINERY LTD., MONETTE FARMS BC LTD., MONETTE FARMS LAND GP LTD., MONETTE FARMS LAND II GP LTD., AND MONETTE FARMS BC GP LTD.
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GOVERNMENT AGENCIES	METHOD OF DELIVERY	*ROLE/INTEREST*
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OFFICE OF THE SUPERINTENDENT OF BANKRUPTCY CANADA CCAA Team Osbccaa-laccbsf@ised-isde.gc.ca	Email	*Interested Party*
SASKATCHEWAN CROP INSURANCE CORPORATION Box 3000 484 Prince William Drive Melville, Saskatchewan S0A 2P0	Courier	*Interested Party*
CANADIAN GRAIN COMMISSION Prairie Regional Office – Edmonton c/o Department of Justice Epcor Tower, Suite 300 10423 – 101 Street NW Edmonton, Alberta T5H 0E7 and **Licensing and Security** 100-303 Main Street Winnipeg, Manitoba R3C 3G8 licence@grainscanada.gc.ca	Email	*Interested Party*
MINISTRY OF THE ATTORNEY GENERAL (BRITISH COLUMBIA) Legal Services Branch Ministry of Attorney General PO Box 9280 Stn Prov Govt Victoria, BC, V8W 9J7	Email	*Interested Party*

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BRITISH COLUMBIA SURFACE RIGHTS BOARD 1270 - 605 Robson Street Vancouver, BC V6B 5J3 office@surfacerightsboard.bc.ca	Email	*Interested Party*
BRITISH COLUMBIA MINISTRY OF AGRICULTURE AND FOOD Honourable Lana Popham Minister of Agriculture and Food PO Box 9043 Stn Prov Govt Victoria, BC V8W 9E2 AF.Minister@gov.bc.ca	Email	*Interested Party*
ALBERTA MINISTRY OF AGRICULTURE AND IRRIGATION c/o Alberta Justice 2nd flr, 10011 – 109 Street NW Edmonton, AB T5J 3S8 jsg.servicehmk@gov.ab.ca	Email	*Interested Party*
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MANITOBA MINISTRY OF AGRICULTURE Main Head Office 545 University Crescent Winnipeg, MB R3T 5S6 agriculture@gov.mb.ca	Email	*Interested Party*

GOVERNMENT AGENCIES	METHOD OF DELIVERY	*ROLE/INTEREST*
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Schedule B

COURT FILE NUMBER	2601-07148	Clerk's Stamp
COURT	COURT OF KING'S BENCH OF ALBERTA	
JUDICIAL CENTRE	CALGARY	
	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 MONETTE FARMS LTD., MONETTE FARMS ONTARIO CORP., NEXGEN SEEDS LTD., MONETTE PRODUCE LTD., MONETTE SEEDS LTD., MONETTE LAND CORP., DMO HOLDINGS LTD., DMO HOLDINGS USA, INC., MONETTE SEEDS USA, LLC, MONETTE FARMS ARIZONA, LLC, MONETTE FARMS USA, INC., 1012595 DE INC., MONETTE PRODUCE, LLC, GOAT'S PEAK WINERY LTD., MONETTE FARMS BC LTD., MONETTE FARMS LAND GP LTD., MONETTE FARMS LAND II GP LTD., AND MONETTE FARMS BC GP LTD.	
APPLICANTS	MONETTE FARMS LTD., MONETTE FARMS ONTARIO CORP., NEXGEN SEEDS LTD., MONETTE PRODUCE LTD., MONETTE SEEDS LTD., MONETTE LAND CORP., DMO HOLDINGS LTD., DMO HOLDINGS USA, INC., MONETTE SEEDS USA, LLC, MONETTE FARMS ARIZONA, LLC, MONETTE FARMS USA, INC., 1012595 DE INC., MONETTE PRODUCE, LLC, GOAT'S PEAK WINERY LTD., MONETTE FARMS BC LTD., MONETTE FARMS LAND GP LTD., MONETTE FARMS LAND II GP LTD., AND MONETTE FARMS BC GP LTD.	
DOCUMENT	**ORDER RE STAY EXTENSION**	
ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	Cassels Brock & Blackwell LLP Suite 3700, Bankers Hall West 888 3rd Street SW Calgary, Alberta, T2P 5C5 Telephone: (403) 351-2920 Facsimile: (403) 648-1151 Email: joliver@cassels.com / dmarechal@cassels.com / mclarksonmaciel@cassels.com File No.: 063030-01 Attention: Jeffrey Oliver / Danielle Maréchal / Matteo Clarkson-Maciel	

DATE ON WHICH ORDER WAS PRONOUNCED: November 10, 2026
NAME OF JUDGE WHO MADE THIS ORDER: The Honourable Justice D.R. Mah
LOCATION OF HEARING: Calgary, Alberta

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UPON the application (the "**Application**") of Monette Farms Ltd., Monette Farms Ontario Corp., NexGen Seeds Ltd., Monette Produce Ltd., Monette Seeds Ltd., Monette Land Corp., DMO Holdings Ltd., DMO Holdings USA, Inc., Monette Seeds USA, LLC, Monette Farms Arizona, LLC, Monette Farms USA, Inc., 1012595 DE INC., Monette Produce, LLC, Goat's Peak Winery Ltd., Monette Farms BC Ltd., Monette Farms Land GP Ltd., Monette Farms Land II GP Ltd., and Monette Farms BC GP Ltd. (collectively, the "**Applicants**") for an order, among other things, extending the Stay Period (as defined in the Amended and Restated Initial Order granted by the Honourable Justice M.H. Bourque in these proceedings on May 1, 2026 (the "**ARIO**")); **AND UPON** having read the Application; the ARIO, the Order Re Stay Extension of the Honourable Justice R.W. Armstrong granted June 12, 2026; the Fifth Affidavit of Darrel Noel Monette sworn 2, 2026; and the Affidavit of Service of Angeline Gagnon, sworn [●], 2026; **AND UPON** reading the Fourth Report of the Monitor dated [●], 2026; **AND UPON** hearing the submissions of counsel for the Applicants, and anyone else appearing for any other person on the service list;

IT IS HEREBY ORDERED AND DECLARED THAT:

SERVICE

1. The time for service of the Application for this Order is hereby abridged and deemed good and sufficient and this Application is properly returnable today.

DEFINED TERMS

2. Capitalized terms have the same meaning as in the ARIO unless otherwise defined.

STAY EXTENSION

3. The Stay Period is hereby extended from November 13, 2026, up to and including November 25, 2026.

MISCELLANEOUS

4. Service of this Order shall be deemed good and sufficient by:

   (a) serving the same on:

      (i) the persons listed on the service list created in these proceedings;

      (ii) any other person served with notice of the application for this Order; and

      (iii) any other parties attending or represented at the application for this Order; and

(b) posting a copy of this Order on the Monitor's website at: http://cfcanada.fticonsulting.com/MonetteFarms,

and service on any other person is hereby dispensed with.

5. 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

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