



IN THE SUPREME COURT OF BRITISH COLUMBIA

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

AND

IN THE MATTER OF THE *BUSINESS CORPORATIONS ACT*,
S.B.C. 2002, c. 57, AS AMENDED AND THE *BUSINESS
CORPORATIONS ACT*, S.N.B. 1981, c. B-9.1, AS AMENDED

AND

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF
TREVALI MINING CORPORATION AND TREVALI MINING (NEW BRUNSWICK) LTD.

PETITIONERS

NOTICE OF APPLICATION

Name of applicant: FTI Consulting Canada Inc., in its capacity as court-appointed monitor of Trevali Mining Corporation and Trevali Mining (New Brunswick) Ltd. (in that capacity, the "**Monitor**" or the "**Applicant**")

To: The Service Lists attached hereto as **Schedule "A"**.

TAKE NOTICE that an application will be made by the Applicants to the Honourable Madam Justice Fitzpatrick at the courthouse at 800 Smithe Street, Vancouver, British Columbia, on March 24, 2026 at 10:00 a.m., for the orders set out in Part 1 below.

The Applicant estimates that the application will take 1 hour.

- This matter is within the jurisdiction of an associate judge.
- This matter is not within the jurisdiction of an associate judge.

Part 1: ORDERS SOUGHT

1. An order, as necessary, abridging the time for service of this Notice of Application and the Twenty-Fourth Report of the Monitor dated March 17, 2026 (the "**Twenty-Fourth Report**").

2. An order substantially in the form attached hereto as **Schedule “B”**, that, among other things, extend the Stay Period, as defined in paragraph 15 of the Amended and Restated Initial Order of this Court pronounced on August 29, 2022 (the “**ARIO**”) in respect of Trevali Mining Corporation (“**Trevali Corp.**”) from March 31, 2026, until and including September 30, 2026 (the “**Stay Extension**”);
3. An order substantially in the form attached hereto as **Schedule “C”** (the “**Second Appian Civil Claim Order**”), that, among other things:
 - (a) Directing that the Supreme Court of British Columbia Action No. 257635 (the “**Appian Civil Claim**” or the “**Action**”), which arises from alleged breaches of the Share and Asset Purchase Agreement dated December 15, 2022 (the “**Appian SAPA**”), and approved by this Court on December 21, 2022, related to lead contamination at and around the Rosh Pinah mine (the “**Lead Indemnity Claim**”), shall be tried within the CCAA Proceedings (as defined below) and the parties to the Action submit to the jurisdiction of this Court under the *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the “**CCAA**”), to resolve all disputes raised in the Action; and
 - (b) setting out pre-trial procedures in respect of the Action, and the timelines thereof.
4. Such further orders as counsel for the Applicant may advise and this Court may deem appropriate in the circumstances.

Part 2: FACTUAL BASIS

5. The Monitor currently has expanded powers with respect to Trevali Corp. The Monitor seeks the Stay Extension to permit the Monitor to continue progressing various matters in this proceeding, including without limitation, outstanding claims under the claims process, addressing certain indemnity claims, including the Lead Indemnity Claim, and the administration of Trevali Corp.’s estate generally.

Summary of the CCAA Proceedings

6. On August 19, 2022, this Court granted an Initial Order (the “**Initial Order**”) commencing proceedings (the “**CCAA Proceedings**”) pursuant to the CCAA. The Initial Order granted, among other things, a stay of proceedings (the “**Stay of Proceedings**”) in favour of Trevali Corp. and Trevali Mining (New Brunswick) Ltd. (“**Trevali NB**”, and collectively with Trevali Corp., “**Trevali**” or the “**Petitioners**”) until the initial return date of August 29, 2022.
7. Capitalized terms not otherwise defined herein are defined in the Twenty-Fourth Report.

8. On August 29, 2022, this Court granted the ARIO, which extended the Stay of Proceedings until October 6, 2022, among other matters. The Stay of Proceedings in respect of Trevali Corp. has been further extended from time to time and currently expires on March 31, 2026.
9. Since being granted protection under the CCAA, both Trevali Corp. and Trevali NB have worked to restructure their affairs for the benefit of their stakeholders and to maximize recovery for creditors.
10. On September 14, 2022, this Court approved a Sales and Investment Solicitation Process (the "**SISP**") to solicit offers for, among other things, the purchase of Trevali Corp.'s interest in the Rosh Pinah mine in Namibia.
11. The SISP resulted in a sale (the "**Appian Transaction**") of Trevali Corp.'s 90% interest in the Rosh Pinah mine, Trevali Corp.'s primary asset of value, by way of a sale of the shares of GLCR Limited, to Appian Natural Resources Fund III LP and Appian Natural Resources (UST) Fund III LP (collectively, "**Appian**") pursuant to the Appian SAPA, as subsequently assigned pursuant to an assignment agreement dated June 2, 2023, to ANR RP Limited, an Appian affiliate, as authorized in the Appian SAPA.
12. On December 21, 2022, this Court approved the Appian Transaction.
13. On March 29, 2023, this Court granted an order approving a process for determining the nature and amounts of certain claims against Trevali and their directors and officers (the "**Claims Process Order**"). This Court also granted an order appointing the members of the Ad Hoc Committee of Shareholders of Trevali Corp. (the "**Shareholder Representatives**") as representatives of the interests of certain securities claimants and appointing KND Complex Litigation as counsel (the "**Shareholder Representatives' Counsel**") to the Shareholder Representatives.
14. On April 26, 2024, this Court granted an order that the proof of claim submitted by the Shareholder Representatives (the "**Shareholders' Claim**") is not subject to the Claims Process Order and that the Shareholders' Claim be adjudicated through an alternative procedure including participation in mediation and the ability to apply to this Court for further directions in respect of the adjudication of the Shareholders' Claim.
15. On April 24, 2023, this Court approved a distribution order (the "**First Distribution Order**") authorizing the distribution by Trevali Corp. of available funds including in respect of the Immediately Available Sale Proceeds (as defined in the Distribution Order) arising from the Appian Transaction. The Distribution Order authorizes the distribution of funds as more particularly set out in that order including distribution on account of the Outstanding Interim Financing Balance, the Revolving Credit Facility and the Glencore Facility (each as

defined in the Distribution Order), subject to certain required holdbacks, as further defined and described in the Distribution Order.

16. On June 23, 2023, the Appian Transaction closed. On closing of the Appian Transaction, funds were distributed on account of the Outstanding Interim Financing Balance, the Revolving Credit Facility and the Glencore Facility as authorized in the Distribution Order. The Outstanding Interim Financing Balance, the Revolving Credit Facility and the Glencore Facility have been repaid in full.
17. While there are certain remaining recoveries that are expected to further maximize value for Trevali Corp.'s stakeholders, as discussed below, the vast majority of Trevali Corp.'s valuable assets have been sold or otherwise liquidated/restructured as part of the CCAA Proceedings or other court processes.
18. With respect to Trevali Corp.'s other two principal mining assets, namely the Caribou Mine in New Brunswick and the Perkoa Mine in Burkina Faso, since Trevali filed for CCAA protection:
 - (a) on November 14, 2022, a liquidation process was commenced for Nantou Mining Burkina Faso S.A. ("**Nantou Mining**"), Trevali's 90% indirectly owned subsidiary that operates the Perkoa Mine. The liquidator in Burkina Faso has assumed responsibility for the operations of Nantou Mining; and
 - (b) on January 9, 2023, FTI Consulting Canada Inc. was appointed as the receiver (in such capacity, the "**Receiver**") of all the assets, undertakings and property of Trevali NB, including all proceeds thereof, other than any real property, mineral claims, mining leases or real property leases owned or held by Trevali NB, effective from January 24, 2023 at 11:59 pm. Since its appointment, the Receiver has been working to maximize value for those Trevali NB assets.
19. Trevali's remaining employees ceased their employment with Trevali on or prior to June 30, 2023. In addition, Trevali's one remaining director also resigned prior to June 30, which was also when Trevali's directors' and officers' insurance expired.
20. Given the status of Trevali Corp.'s restructuring efforts, the nature of its remaining assets, and the reduction of its employees and management, Trevali Corp. brought an application to expand the Monitor's powers regarding Trevali Corp.
21. On June 28, 2023, this Court granted an order expanding the powers of the Monitor with respect to Trevali Corp. and its property (the "**EMP Order**").

22. As of November 29, 2025, the Monitor was holding approximately CA\$8,000,000 in the Trevali Corp. estate trust accounts resulting from, among other things, the Appian Transaction and the liquidation of Trevali Corp.'s holdings of Cerro de Pasco Resources Inc. ("**CDPR**") shares. As a result, the Monitor sought approval of an interim distribution of CA\$5,800,000 on a pro rata basis to Trevali Corp.'s unsecured creditors with Proven Claims (as defined in and pursuant to the Claims Process Order) against Trevali Corp. (the "**Interim Distribution**").
23. On December 8, 2025, this Court approved an interim distribution order (the "**Interim Distribution Order**") authorizing the Interim Distribution by the Monitor on behalf of Trevali Corp.

Stay Extension

24. Since August 29, 2022, when this Court granted the ARIO and extended the Stay of Proceedings until October 6, 2022, the Stay of Proceedings in respect of Trevali Corp. has been further extended as follows:
 - (a) until December 15, 2022, by the Order of this Court pronounced October 11, 2022;
 - (b) until January 27, 2023, by the Order of this Court pronounced December 14, 2022;
 - (c) until April 30, 2023, by the Order of this Court pronounced January 27, 2023;
 - (d) until June 2, 2023, by the Order of this Court pronounced April 24, 2023;
 - (e) until July 14, 2023, by the Order of this Court pronounced June 2, 2023;
 - (f) until October 27, 2023, by the Order of this Court pronounced June 28, 2023;
 - (g) until April 26, 2024, by the Order of this Court pronounced October 25, 2023;
 - (h) until October 31, 2024, by the Order of this Court pronounced April 26, 2024;
 - (i) until March 31, 2025, by the Order of this Court pronounced October 28, 2024;
 - (j) until September 30, 2025, by the Order of this Court pronounced March 31, 2025;
and
 - (k) until March 31, 2026, by the Order of this Court pronounced September 26, 2025.

25. Since the last stay extension order, the Monitor has, among other things:
- (a) continued to work with former management to assist with ongoing matters on a contract basis;
 - (b) corresponded with creditor claimants pursuant to the Claims Process Order and sought to resolve all outstanding claims;
 - (c) made the Interim Distribution pursuant to the Interim Distribution Order;
 - (d) progressed the second term sheet with Bathurst Metallic Corp. with respect to the sale of substantially all of the assets of Trevali Mining (Maritimes) Ltd., a wholly-owned subsidiary of Trevali Corp.;
 - (e) with the assistance of its counsel, responded to the appeal by Glencore Canada Corporation of the order of this Court granted December 13, 2024, that Glencore Canada Corporation remit to the Receiver certain amounts owing to the Canada Revenue Agency (the “**Glencore HST Appeal**”);
 - (f) with the assistance of former management and its counsel, continued to address indemnity claims from ANR RP Limited under the Appian SAPA and the Indemnity Escrow Agreement (as defined in the Appian SAPA);
 - (g) with the assistance of former management and its counsel, settled arbitration proceedings with respect to amounts owed to Trevali Corp. by CDPR (the “**CDPR Arbitration**”) and was granted approval of the settlement agreement in this regard by this Court; and
 - (h) prepared the Twenty-Fourth Monitor’s Report and other reports in respect of the above.
26. The Monitor seeks the Stay Extension to allow the Monitor time to, among other things:
- (a) attend to remaining post-closing matters associated with the Appian Transaction, in particular with respect to the Indemnity Escrow Agreement and related indemnity claims under the Appian SAPA, including the Lead Indemnity Claim;
 - (b) resolve outstanding creditor claims;
 - (c) address any matters arises from the Glencore HST Appeal; and
 - (d) otherwise administer Trevali Corp.’s estate.
27. Trevali Corp. will have sufficient liquidity during the period of the Stay Extension.

Lead Indemnity Claim

28. As noted above, the SISF resulted in a sale of Trevali Corp.'s 90% interest in the Rosh Pinah mine, Trevali Corp.'s primary asset of value, by way of a sale of the shares of GLCR Limited, to Appian pursuant to the Appian SAPA, as subsequently assigned pursuant to an assignment agreement dated June 2, 2023, to ANR RP Limited, an Appian affiliate, as authorized in the Appian SAPA.
29. Pursuant to the Appian SAPA, the representations, warranties, covenants and obligations contained therein survived the closing and continued in full force and effect for a period of 18 months after the closing date, being December 23, 2024 (the "**Release Date**").
30. Indemnity claims under the Appian SAPA are first satisfied pursuant to the terms of the Indemnity Escrow Agreement dated June 23, 2023 (the "**Indemnity Escrow Agreement**"). The amount held by the escrow agent pursuant to the Appian SAPA and the Indemnity Escrow Agreement is USD \$9 million.
31. Trevali Corp. as an "Indemnifying Party" has received two indemnity claims with respect to the Appian SAPA, which included the Lead Indemnity Claim. The claimed damages are alleged to be at least USD \$12,081,950.45.
32. In accordance with the terms of the Appian SAPA and the Indemnity Escrow Agreement, Trevali Corp. has disputed the Lead Indemnity Claim.
33. The Lead Indemnity Claim, as a "Direct Claim" under the Appian SAPA, was subject to a thirty-day period of good faith effort to resolve the dispute under the Appian SAPA. The Monitor, on behalf of Trevali Corp., and RPZC and ANR RP Limited engaged in such good faith discussions, but could not resolve the Lead Indemnity Claim.
34. Pursuant to the Appian SAPA, the Appian Civil Claim is to be resolved by this Court within the CCAA Proceeding.
35. On September 26, 2025, this Court ordered and directed (the "**First Appian Civil Claim Order**") that, among other things.
 - (a) RPZC, Appian and ANR RP Limited (collectively, the "**Appian Plaintiffs**") are permitted to file the Appian Civil Claim in respect of the Lead Indemnity Claim;
 - (b) on or before November 25, 2025, Trevali Corp. shall serve and file a Response to Civil Claim in respect of the Appian Civil Claim;
 - (c) on or before December 19, 2025, the Appian Plaintiffs may serve and file a reply in respect of the Appian Civil Claim;

(d) any and all further steps in respect of the Appian Civil Claim are stayed until the Monitor of Appian seek further directions from this Court, by way of procedural order, regarding the adjudication of the Appian Civil Claim in the CCAA Proceedings; and

(e) the Appian Civil Claim will be adjudicated in the CCAA Proceedings.

36. In accordance with the First Appian Civil Claim Order:

(a) on October 9, 2025, the Appian Plaintiffs commenced the Appian Civil Claim;

(b) on November 25, 2025, Trevali filed and serve a Response to Civil Claim (the "**Appian Response**") in respect of the Appian Civil Claim; and

(c) the Appian Plaintiffs did not file any reply.

37. Following the exchange of the Appian Civil Claim and the Appian Response, the parties to the Action, with the assistance of counsel, discussed and ultimately agreed on the terms of the Second Appian Civil Claim Order to advance the Action.

38. The Monitor, with the consent of the Appian Plaintiffs, seeks approval of the Second Appian Civil Claim Order.

Part 3: LEGAL BASIS

39. The Applicant relies on:

(a) CCAA, in particular, sections 11 and 11.02;

(b) *Supreme Court Civil Rules*, in particular Rules 8-1, 13-1 and 22-4;

(c) the inherent and equitable jurisdiction of this Court; and

(d) such further and other legal bases and authorities as counsel may advise and this Court may permit.

Stay Extension

40. Subsection 11.02 of the CCAA provides this Court with broad discretion to allow a debtor time and space to advance its restructuring efforts, including by extending a stay of proceedings. A stay of proceedings is the "central tool" by which the court maintains the *status quo* for a debtor, allowing a debtor the necessary time, flexibility and "breathing room" to carry out a supervised restructuring or organized sales process while continuing

its ongoing operations. This includes time to arrange an acceptable sale of assets in order to maximize recovery for stakeholders.

1057863 B.C. Ltd. (Re), 2022 BCSC 876 at paras. 31, 35, citing *Timminco Limited (Re)*, 2012 ONSC 2515 at para. 15.

41. The baseline considerations and requirements for a stay extension are that a stay is “appropriate” and that debtors have been and are acting in good faith and with due diligence.

**CCAA, ss. 11.02(2)–(3).
1057863 B.C. Ltd. (Re), 2022 BCSC 876 at para. 31.**

42. “Appropriateness” is assessed by inquiring whether the order sought advances the policy objectives underlying the CCAA. While the primary objective underlying the CCAA is to avoid the social and economic losses resulting from liquidation of an insolvent company, the CCAA has the simultaneous objectives of maximizing creditor recovery, preservation of going-concern value where possible, preservation of jobs and communities affected by the firm’s financial distress and enhancement of the credit system generally. “Liquidating CCAAs” are now commonplace in the CCAA landscape.

***Century Services Inc. v. Canada (Attorney General)*, 2010 SCC 60 at para. 70.
9354-9185 Québec Inc. v. Callidus Capital Corp., 2020 SCC 10 at para. 42.**

43. The relative weight that the different objectives of the CCAA take on in a particular case may vary based on the factual circumstances, the stage of proceedings, or the proposed solutions that are presented to the court for approval. For example, “where a reorganization or liquidation is complete and the court is dealing with residual assets, the objective of maximizing creditor recovery from those assets may take centre stage.”

***9354-9185 Québec Inc. v. Callidus Capital Corp.*, 2020 SCC 10 at para. 46.**

44. The Monitor and Trevali Corp. have been working in good faith and with due diligence and granting the Stay Extension is appropriate and necessary in the circumstances.

45. The Stay Extension will allow the Monitor to take further steps to maximize creditor recovery. Among other things, during the Stay Extension the Monitor may:

- (a) attend to remaining post-closing matters associated with the Appian Transaction, in particular with respect to the Indemnity Escrow Agreement and related indemnity

claims in this regard, including progressing the Appian Civil Claim in accordance with the Second Appian Civil Claim Order, if granted;

- (b) resolve outstanding creditor claims;
 - (c) address any matters that may arise from the Glencore HST Appeal; and
 - (d) otherwise administer Trevali Corp.'s estate.
46. The cashflow included in the Twenty-Fourth Report indicates that Trevali Corp. will have sufficient liquidity during the period of the Stay Extension.
47. There is not any material financial prejudice to Trevali Corp.'s creditors as a result of the Stay of Proceedings being extended to September 30, 2026.
48. Granting the Stay Extension will allow the Monitor to continue the CCAA Proceedings and its efforts towards maximizing value for Trevali Corp.'s assets for the benefit of creditors.
49. The Monitor respectfully requests that this Court grant the Stay Extension.

Lead Indemnity Claim

50. Pursuant to paragraph 4(w) of the EMP Order and paragraph 46 of the ARIO, the Monitor may apply to this Court for directions.
51. Pursuant to the Appian SAPA, as approved by this Court, and the First Appian Civil Claim Order, the Appian Civil Claim is to be resolved by this Court within the CCAA Proceedings.
52. With the exception of filing and serving the Appian Civil Claim and the Appian Response, the First Appian Civil Claim Order stayed any and all further steps in the Action until the Monitor or the Appian Plaintiffs sought further directions from this Court regarding the adjudication of the Appian Civil Claim.
53. The Monitor, with the consent of the Appian Plaintiffs, seeks further orders and directions, as set out in the Second Appian Civil Claim Order, setting out pre-trial procedures in respect of the Action, and the timelines thereof.
54. Section 11 of the CCAA "endows the CCAA court with broad jurisdiction to advance the purposes of the statute by making any order that it considers 'appropriate.'" Any "relief granted must be consistent with the statutory objectives of the CCAA and in furtherance of its remedial purposes. In considering the relevant factual circumstances, the

overarching question is whether both the purpose of the order sought and the means it seeks to employ advance the remedial purpose of the CCAA”.

***Alderbridge Way GP Ltd. (Re)*, 2023 BCSC 1718 at paras. 31-32.
1057863 B.C. Ltd. (Re), 2022 BCSC 759 at para. 51.**

55. Specifically as it relates to the Appian Civil Claim, Section 11 permits this Court to address the Appian Civil Claim if doing so is “in furtherance of the CCAA’s remedial purposes.”

***Alderbridge Way GP Ltd. (Re)*, 2023 BCSC 1718 at para. 41.**

56. The parties to the Appian SAPA agreed that any indemnity claims would be resolved by this Court in the CCAA Proceedings, to the extent necessary. Further, the First Appian Civil Claim Order, requires that the Appian Civil Claim be adjudicated in the CCAA Proceedings and that a further procedural order would be necessary to advance such adjudication.
57. The Monitor, on behalf of Trevali Corp., and the Appian Plaintiffs discussed and consent to the terms set out in the Second Appian Civil Claim Order.
58. The Monitor respectfully requests that this Court grant the Second Appian Civil Claim Order.

Part 4: MATERIAL TO BE RELIED ON

1. Twenty-Fourth Report of the Monitor dated March 17, 2026;
2. Amended and Restated Initial Order dated August 29, 2022, as amended and restated from time to time;
3. EMP Order dated June 28, 2023;
4. First Appian Civil Claim Order dated September 26, 2025; and
5. Such further and other material as counsel for the Applicant may advise.

TO THE PERSONS RECEIVING THIS NOTICE OF APPLICATION: If you wish to respond to this Notice of Application, you must, within 5 business days after service of this Notice of Application or, if this application is brought under Rule 9-7, within 8 business days of service of this Notice of Application,

- (a) file an Application Response in Form 33,
- (b) file the original of every affidavit, and of every other document, that
 - (i) you intend to refer to at the hearing of this application, and
 - (ii) has not already been filed in the proceeding, and
- (c) serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:
 - (i) a copy of the filed Application Response;
 - (ii) a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on that person;
 - (iii) if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7(9).

Date: 17/MAR/2026

NICHOLAS
TSANG

for:



Signature of lawyer for the Applicants
John Sandrelli

Dentons Canada LLP
Barristers and Solicitors
20th Floor, 250 Howe Street
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To be completed by the court only:	
Order made	
<input type="checkbox"/>	in the terms requested in paragraphs _____ of Part 1 of this Notice of Application
<input type="checkbox"/>	with the following variations and additional terms:

Date:	_____
Signature of <input type="checkbox"/> Judge <input type="checkbox"/> Associate Judge	

APPENDIX

THIS APPLICATION INVOLVES THE FOLLOWING:

- discovery: comply with demand for documents
- discovery: production of additional documents
- other matters concerning document discovery
- extend oral discovery
- other matter concerning oral discovery
- amend pleadings
- add/change parties
- summary judgment
- summary trial
- service
- mediation
- adjournments
- proceedings at trial
- case plan orders: amend
- case plan orders: other
- experts
- none of the above

SCHEDULE "A"

NO. S-226670
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

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

AND

IN THE MATTER OF THE *BUSINESS CORPORATIONS ACT*,
S.B.C. 2002, C-57, AS AMENDED AND THE *BUSINESS CORPORATIONS ACT*, S.N.B. 1981,
C. B-9.1, AS AMENDED

AND

AND IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF TREVALI
MINING CORPORATION AND TREVALI MINING (NEW BRUNSWICK) LTD.

PETITIONERS

SERVICE LIST

As at December 8, 2025

Monitor's Website: <http://cfcanada.fticonsulting.com/trevali/>

Name of Counsel:	Name of Parties:
<p>Blake, Cassels & Graydon LLP 1133 Melville Street Suite 3500, The Stack Vancouver, BC V6E 4E5</p> <p>Tel. No. 604-631-3331</p> <p>Attention: Peter Rubin Peter Bychawski Claire Hildebrand Alison Burns</p> <p>Email: peter.rubin@blakes.com; peter.bychawski@blakes.com; claire.hildebrand@blakes.com; alison.burns@blakes.com</p>	<p><i>Counsel for Petitioners Trevalli Mining Corporation and Trevalli Mining (New Brunswick) Ltd.</i></p>

Name of Counsel:	Name of Parties:
<p>FTI Consulting Canada Inc. Suite 1450, 701 West Georgia Street Vancouver, BC V7Y 1B6</p> <p>Tel. No. 604.551.9881</p> <p>Attention: Tom Powell Craig Munro Mike Clark</p> <p>E-mail: tom.powell@fticonsulting.com; craig.munro@fticonsulting.com; mike.clark@fticonsulting.com;</p>	<p><i>Court Appointed Monitor</i></p>
<p>Dentons Canada LLP 20th Floor, 250 Howe Street Vancouver, BC V6C 3R8</p> <p>Tel. No. 604-687-4460</p> <p>Attention: John R. Sandrelli Jordan Schultz Valerie Cross Eamonn Watson</p> <p>E-mail: john.sandrelli@dentons.com jordan.schultz@dentons.com valerie.cross@dentons.com eamonn.watson@dentons.com avic.arenas@dentons.com chelsea.denton@dentons.com</p>	<p><i>Counsel to the Monitor, FTI Consulting Canada Inc.</i></p>
<p>Fasken Martineau DuMoulin LLP Suite 2900, 550 Burrard Street Vancouver, BC V6C 0A3</p> <p>Tel. No. (604) 631-4786</p> <p>Attention: Stuart Brotman Kibben Jackson Glen Nesbitt</p> <p>Email: sbrotman@fasken.com kjackson@fasken.com gnesbitt@fasken.com</p>	<p><i>Counsel for The Bank of Nova Scotia, as Administrative Agent</i></p>

Name of Counsel:	Name of Parties:
<p>McCarthy Tétrault LLP Suite 2400 745 Thurlow Street Vancouver, BC V6E 0C5</p> <p>Tel. No. 604-643-7154</p> <p>Attention: Lance Williams Ashley Bowron</p> <p>Email: lwilliams@mccarthy.ca abowron@mccarthy.ca sdanielisz@mccarthy.ca</p>	<p><i>Counsel to Glencore International AG, Glencore AG and Glencore Canada Corporation</i></p>
<p>KND Complex Litigation 1186 Eglinton Ave West Toronto, Ontario M6C 2E3</p> <p>Tel. No. 416-507-6592</p> <p>Attention: Eli Karp Sage Nematollahi Taek Soo Shin</p> <p>Email: ek@knd.law sn@knd.law ts@knd.lawa</p>	<p><i>Counsel to an ad hoc committee of Trevali Mining Corporation shareholders</i></p>
<p>United Steelworkers Canadian National Office Legal Department 800-234 Eglinton Avenue East Toronto, ON M4P 1K7</p> <p>Tel. No. 416-544-5980</p> <p>Attention: Kristina Adhikari</p> <p>Email: kadhikari@usw.ca</p>	<p><i>Counsel for United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, Local 1-306 (Caribou Mine)</i></p>
<p>Osler, Hoskin & Harcourt LLP Suite 3000, Bentall 4 1055 Dunsmuir Street Vancouver, BC V7X 1K8</p> <p>Tel. No. 236-466-2816</p> <p>Attention: Mary I.A. Buttery, K.C. Amanda Manasterski Brodie Noga</p> <p>Email: mbuttery@osler.com amanasterski@osler.com bnoga@osler.com</p>	<p><i>Counsel for the Directors of Trevali Mining Corporation</i></p>

Name of Counsel:	Name of Parties:
<p>British Columbia Regional Office Department of Justice Canada 900 – 840 Howe Street Vancouver, British Columbia V6Z 2S9</p> <p>Tel. No. 587-930-5282</p> <p>Attention: Aminollah Sabzevari</p> <p>Email: Aminollah.Sabzevari@justice.gc.ca</p>	<p><i>His Majesty the King in Right of Canada</i></p>
<p>Office of the Attorney General Chancery Place 2078 - 675 King Street P.O. Box 6000 Fredericton, NB E3B 5H1</p> <p>Tel. No. (506) 462-5100</p> <p>Attention: Christopher Whibbs</p> <p>Email: Christopher.Whibbs@gnb.ca</p>	<p><i>His Majesty the King in Right of the Province of New Brunswick, as represented by the Department of Natural Resources and Energy Development</i></p>
<p>Farris LLP PO Box 10026, Pacific Centre South 25th Floor, 700 W Georgia Street Vancouver, BC</p> <p>Tel. No. (604) 661-2174</p> <p>Attention: Tevia Jeffries</p> <p>Email: tjeffries@farris.com lferguson@farris.com</p>	<p><i>His Majesty the King in Right of the Province of New Brunswick, as represented by the Department of Natural Resources and Energy Development</i></p>
<p>Lawson Lundell LLP 1600 - 925 West Georgia Street, Vancouver, BC V6C 3L2</p> <p>Tel. No. 604-631-9163</p> <p>Attention: William L. Roberts</p> <p>Email: wroberts@lawsonlundell.com</p>	<p><i>Counsel for Graymont Limited and Graymont (NB) Inc.</i></p>
<p>New Brunswick Power Corporation 515 King Street P.O. Box 2010 Fredericton, NB E3B 5G4</p> <p>Tel. No. 506-458-393</p> <p>Attention: Leanne Murray</p> <p>Emails: LMurray@nbpower.com</p>	<p><i>Counsel for NB Power Corporation</i></p>

Name of Counsel:	Name of Parties:
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<p>DLA Piper (Canada) LLP Suite 2800, Park Place 666 Burrard Street Vancouver, BC V6C 2Z7</p> <p>Tel: (604) 643-6400</p> <p>Attention: Colin Brousson</p> <p>Email: colin.brousson@dlapiper.com</p>	<p><i>Counsel for BDO Canada LLP</i></p>
<p>DS Lawyers Canada LLP 1080 côte du Beaver Hall #2100 Montréal QC H2Z 1S8</p> <p>Tel: (514) 360-5102</p> <p>Attention: Jean-Yves Simard</p> <p>Email: jysimard@dsavocats.ca</p>	<p><i>Counsel for Magotteaux Ltd.</i></p>
<p>Cassels Brock & Blackwell LLP Suite 2100, Scotia Plaza, 40 King St. W. Toronto, ON M5H 3C2</p> <p>Tel: (416) 860-5225</p> <p>Attention: John Birch Jared Enns</p> <p>Emails: jbirch@cassels.com jenns@cassels.com</p> <p>Cassels Brock & Blackwell LLP Suite 2200, RBC Place 885 West Georgia St. Vancouver, BC V6C 3E8</p> <p>Tel: (778) 372-6787</p> <p>Attention: Vicki Tickle</p> <p>Email: vtickle@cassels.com</p>	<p><i>Counsel for XL Specialty Insurance Company</i></p>

Name of Counsel:	Name of Parties:
<p>Stikeman Elliott LLP 1155 René-Lévesque Blvd. West 41st Floor Montréal, Québec H3B 3V2 Tel: (514) 397-6495 Attention: Danny Duy Vu / Darin Renton / Sam Dukesz/ Lee Nicholson / Aaron Kreaden Email: ddvu@stikeman.com DRenton@stikeman.com SDukesz@stikeman.com leenicholson@stikeman.com AKreaden@stikeman.com</p>	<p><i>Counsel for Appian Natural Resources Fund III LP / Appian Natural Resource Fund (UST) III LP</i></p>
<p>Stikeman Elliott LLP Barristers & Solicitors 5300 Commerce Court West, 199 Bay Street Toronto, ON M5L 1B9 Tel.: (416) 869-5230 Attention: Maria Konyukhova / Kyle Allen Email: mkonyukhova@stikeman.com Kyle.Allen2@orica.com</p>	<p><i>Counsel for Orica Canada Inc.</i></p>
<p>Chaitons LLP 5000 Yonge Street - 10th Floor Toronto, ON, M2N 7E9 Tel: 416.218.1161 Attention: Maya Poliak Emails: Maya@chaitons.com; lyndac@chaitons.com</p>	<p><i>Counsel for DSS Sustainable Solutions Canada Inc.</i></p>
<p>Fogler, Rubinoff LLP 77 King Street West Suite 3000, P.O. Box 95 TD Centre North Tower Toronto, ON M5K 1G8 Tel: 416. 941.8842 Attention: Vern W. DaRe / Rick Moscone Emails: vdare@foglers.com rmoscone@foglers.com</p>	<p><i>Counsel for Eagle Pass Mining Corp.</i></p>

Name of Counsel:	Name of Parties:
Lawson Lundell LLP 1600 - 925 West Georgia Street, Vancouver, BC V6C 3L2 Attention: Scott Lucyk / Marko Vesely Email: slucyk@lawsonlundell.com mvesely@lawsonlundell.com cformosa@lawsonlundell.com	<i>Counsel for Cerro de Pasco Resources Inc.</i>

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SCHEDULE "B"

No. S-226670
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

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

AND

IN THE MATTER OF THE *BUSINESS CORPORATIONS ACT*,
S.B.C. 2002, c. 57, AS AMENDED AND THE *BUSINESS
CORPORATIONS ACT*, S.N.B. 1981, c. B-9.1, AS AMENDED

AND

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF
TREVALI MINING CORPORATION AND TREVALI MINING (NEW BRUNSWICK) LTD.

PETITIONERS

ORDER MADE AFTER APPLICATION
(STAY EXTENSION)

))
BEFORE) THE HONOURABLE MADAM) 24/MAR/2026
) JUSTICE FITZPATRICK)

ON THE APPLICATION of FTI Consulting Canada Inc., in its capacity as court-appointed monitor of Trevali Mining Corporation and Trevali Mining (New Brunswick) Ltd. (in such capacity, the "**Monitor**"), coming on for hearing at Vancouver, British Columbia, on the 24th day of March, 2026; AND ON HEARING John Sandrelli, counsel for the Monitor, and those other counsel listed on **Schedule "A"** hereto; AND UPON READING the material filed, including the Twenty-Fourth Report of the Monitor dated March 17, 2026 (the "**Twenty-Fourth Report**"); AND pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36 as amended, the *British Columbia Supreme Court Civil Rules*, and the inherent jurisdiction of this Honourable Court;

THIS COURT ORDERS that:

Service

1. The time for service of the Notice of Application and supporting materials is hereby abridged such that the Notice of Application is properly returnable today and service thereof upon any interested party other than those parties on the Service List (as defined in the Amended and Restated Initial Order of this Court dated August 29, 2022) maintained by the Monitor for these proceedings is hereby dispensed with.

Stay Extension

2. The Stay Period (as defined in the Amended and Restated Initial Order of this Court dated August 29, 2022) with respect to Trevali Mining Corporation is hereby extended up to and including September 30, 2026.

General

3. THIS COURT REQUESTS the aid and recognition of other Canadian and foreign Courts, tribunal, regulatory or administrative bodies, including any Court or administrative tribunal of any federal or State Court or administrative body in the United States of America, Burkina Faso, Namibia and South Africa to act in aid of and to be complementary to this Court in carrying out the terms of this Order where required. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to Trevali Mining Corporation and the Monitor, as an officer of this Court, as may be necessary or desirable to give effect to this Order, to grant representative status to the Monitor in any foreign proceeding, or to assist Trevali Mining Corporation and the Monitor and their respective agents in carrying out the terms of this Order.

4. Endorsement of this Order by counsel appearing on this application other than counsel for the Monitor is hereby dispensed with.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT:

Signature of John Sandrelli
Lawyer for the Monitor

By the Court.

Registrar

SCHEDULE "A"

LIST OF COUNSEL

Counsel Name	Party Represented

No. S-226670
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

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

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S.B.C. 2002, C. 57, AS AMENDED AND THE *BUSINESS CORPORATIONS*
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IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF
TREVALI MINING CORPORATION AND TREVALI MINING (NEW
BRUNSWICK) LTD.

PETITIONERS

ORDER MADE AFTER APPLICATION

DENTONS CANADA LLP
BARRISTERS & SOLICITORS
250 Howe Street, 20th Floor
Vancouver, BC V6C 3R8
Phone No.: (604) 687-4460
Attention: Eamonn Watson

File No.
584476-8

SCHEDULE "C"

No. S-226670
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

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

AND

IN THE MATTER OF THE *BUSINESS CORPORATIONS ACT*,
S.B.C. 2002, C. 57, AS AMENDED AND THE *BUSINESS
CORPORATIONS ACT*, S.N.B. 1981, C. B-9.1, AS AMENDED

AND

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF
TREVALI MINING CORPORATION AND TREVALI MINING (NEW BRUNSWICK) LTD.

PETITIONERS

**ORDER MADE AFTER APPLICATION
(APPIAN INDEMNITY CLAIM PROCEDURAL ORDER)**

BEFORE)
) THE HONOURABLE MADAM) 24/MAR/2026
) JUSTICE FITZPATRICK)
)

ON THE APPLICATION of FTI Consulting Canada Inc., in its capacity as court-appointed monitor (in such capacity, the "**Monitor**") of Trevali Mining Corporation ("**Trevali Corp.**"), coming on for hearing at Vancouver, British Columbia, on the 24th day of March, 2026; AND ON HEARING John Sandrelli, counsel for the Monitor, and those other counsel listed on **Schedule "A"** hereto; AND UPON READING the material filed, including Twenty-Fourth Report of the Monitor dated March 17, 2026; AND pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (the "**CCAA**"), as amended, the *British Columbia Supreme Court Civil Rules* (the "**Rules**"), and the inherent jurisdiction of this Honourable Court;

THIS COURT ORDERS AND DECLARES that:

1. In accordance with the Share and Asset Purchase Agreement dated December 15, 2022, as amended from time to time, among Trevali Mining Corporation ("**Trevali**" or the "**Defendant**") and Appian Natural Resources Fund III LP and Appian Natural Resources (UST) Fund III LP, as assigned to ANR RP Limited ("**ANR**", and collectively with Appian Natural Resources Fund III LP and Appian Natural Resources (UST) Fund III LP, "**Appian**", which is collectively with Rosh Pinah Zinc Corporation (PYT) Ltd., the "**Plaintiffs**"), and approved by this Court by order granted December 21, 2022, Supreme Court of British Columbia Action No. 257635 (the "**Action**") shall be tried within this CCAA proceeding and the parties hereby submit to the jurisdiction of this Court under the CCAA to resolve all disputes raised in the Action.

2. The following procedural timeline shall apply to the Action unless otherwise ordered by this Court or agreed to in writing by counsel to each of the parties to the Action:

No.	DATE	INTERVAL	PARTY	STEP
1.	June 16, 2026	12 weeks from date of Order	Plaintiffs	Filing of all affidavits with all evidence in chief, except for expert evidence, and delivery of a list of documents listing all documents identified as exhibits to affidavits.
2.	September 8, 2026	12 weeks	Defendants	Filing of all affidavits with all evidence in chief, except for expert evidence, and delivery of list of documents listing all documents identified as exhibits to affidavits.
3.	October 6, 2026	4 weeks	Plaintiffs	Filing of all affidavits with reply evidence, if any, except for expert evidence.
4.	October 27, 2026	3 weeks	Both	Simultaneous delivery of demands for documents pursuant to Rule 7-1(10) or for additional documents pursuant to Rule 7-1(11), if any.

5.	December 8, 2026	6 weeks	Both	Simultaneous delivery of all responses to demands for documents under Rule 7-1(12), including amended lists of documents if further documents are being produced.
6.	January 5, 2027	4 weeks	Both	Filing of applications for documents pursuant to Rules 7-1(13), if any.
7.	February 2, 2027	4 weeks	Both	Hearing of Rule 7-1(13) applications, if any.
8.		4 weeks after decision on Rule 7-1(13) applications	Both	Parties to produce all further documents ordered as a result of Rule 7-1(13) applications, if any, and delivery of amended lists of documents listing all documents disclosed as a result of Rule 7-1(13) order.
9.		6 weeks	Plaintiffs	Filing of expert evidence by way of affidavit.
10.		4 weeks	Defendant	Filing of responsive expert evidence by way of affidavit.
11.		4 months	Both	Case planning conference to determine trial procedure, including determination of whether cross-examinations may be ordered to be conducted out of court or as part of trial procedure.

3. Documents listed pursuant to the procedural timeline above shall be listed in accordance with Rule 7-1 and all relevant sub-rules, with the exception of Rule 7-1(1)(a)(i), and must also identify which documents correspond to which demands made pursuant to Rules 7-1(10) or 7-1(11).

4. The parties to the Action agree that the requirement to file affidavits of evidence and deliver lists of documents listing only those documents exhibited to the affidavits or ordered to be produced pursuant to Rule 7-1(13) displaces the requirement under Rule 7-1(1)(a)(i) that the parties' lists of documents must disclose all documents which are or have been in the party's possession or control and that could, if available, be used by any party of record at trial to prove or disprove a material fact.
5. The parties to the Action and the Monitor may, from time to time, apply to this Court for directions with respect to the conduct of the Actions.
6. Further Court applications in the Action are stayed save and except as are brought forward for determination in this CCAA proceeding.
7. Adjudication of the Action in this CCAA proceeding does not preclude any pre-trial procedural rights in the Action under the Rules, subject to this Order and any directions from this Court as may be required.
8. Nothing in this Order abrogates the right of any party to the Action to file such other interlocutory application(s) in this CCAA proceeding in connection with the Action, or take any other steps in the Action, as are permissible under the Rules or the CCAA, subject to any directions from this Court as may be required.
9. Notwithstanding any provision of this Order, any and all appeal rights with respect to this Order and the Action, including any future interlocutory or final orders, are subject to Section 13 of the CCAA.

General

10. THIS COURT REQUESTS the aid and recognition of other Canadian and foreign Courts, tribunal, regulatory or administrative bodies, including any Court or administrative tribunal of any federal or State Court or administrative body in the United States of America, Burkina Faso, Namibia and South Africa to act in aid of and to be complementary to this Court in carrying out the terms of this Order where required. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to Trevali Corp. and the Monitor as officer of this Court, as may be necessary or desirable to give effect to this Order, to grant representative status to the Monitor in any foreign proceeding, or to assist Trevali Corp. and the Monitor, and their respective agents in carrying out the terms of this Order.

11. Endorsement of this Order by counsel appearing on this application other than counsel for the Monitor is hereby dispensed with.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT:

Signature of John Sandrelli
Lawyer for the Monitor

By the Court.

Registrar

SCHEDULE "A"

LIST OF COUNSEL

Counsel Name	Party Represented

No. S-226670
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

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

AND

IN THE MATTER OF THE *BUSINESS CORPORATIONS ACT*,
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TREVALI MINING CORPORATION AND TREVALI MINING (NEW
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PETITIONERS

**ORDER MADE AFTER APPLICATION
(APPIAN INDEMNITY CLAIM PROCEDURAL ORDER)**

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File No.
584476-8