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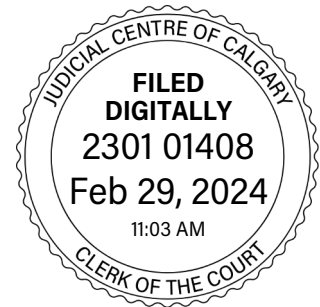
COURT OF KING'S BENCH OF ALBERTA  
IN BANKRUPTCY AND INSOLVENCY

JUDICIAL CENTRE

CALGARY

*IN THE MATTER OF THE BANKRUPTCY  
AND INSOLVENCY ACT, RSC 1985, C B-3*

*IN THE MATTER OF THE RECEIVERSHIP  
OF BRM CANADA GROUP INC.*



APPLICANT

KPMG INC., in its capacity as Court Appointed Receiver of certain  
property of BRM CANADA GROUP INC.

DOCUMENT

**SALE PROCESS APPROVAL ORDER, ETC.**

ADDRESS FOR  
SERVICE AND  
CONTACT  
INFORMATION  
OF PARTY  
FILING THIS  
DOCUMENT

Cassels Brock & Blackwell LLP  
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File No.: 043436-18

**DATE ON WHICH ORDER WAS PRONOUNCED:** February 28, 2024

**LOCATION WHERE ORDER WAS PRONOUNCED:** Calgary, AB

**NAME OF JUSTICE WHO MADE THIS ORDER:** The Honourable Justice M.H. Hollins

**UPON THE APPLICATION** by KPMG Inc. in its capacity as the Court-appointed receiver and manager (the "**Receiver**") of certain undertakings, property and assets of BRM Canada Group Inc. ("**BRM**") for an order, among other things, approving the conduct and activities of the Receiver, approving a proposed marketing and sale process (including entering into a listing agreement) and compelling the production of certain missing information; **AND UPON HAVING READ** the Receivership Order dated December 19, 2023 (the "**Receivership Order**"), the First Report of the Receiver dated February 22, 2024 (the "**Report**"), the Confidential Supplement to the Report, dated February 22, 2024 (the "**Confidential Supplement**") and the Affidavit of Service; **AND UPON HEARING** the submissions of counsel for the Receiver and counsel to any other interested parties in attendance who wished to make submissions;

**IT IS HEREBY ORDERED AND DECLARED THAT:**

1. Service of this application (the “**Application**”) and supporting materials is hereby declared to be good and sufficient and time for service of this application is abridged to that actually given.
2. Terms not otherwise defined herein shall have the meaning ascribed to them in the Report.

Approval of Marketing and Sale Process

3. The Proposed Marketing Process and Sale Process set out at paragraphs 55 to 81 of the Report including the sale process procedures appended to the Report as Appendix “N” (hereinafter collectively referred to as, the “**Sale Process**”), are hereby approved and the Receiver is authorized but not obliged to:
  - (a) enter into a listing agreement substantially in the form appended to the Report as Appendix “O” (the “**Listing Agreement**”); and
  - (b) implement the Sale Process and do all things reasonably necessary to conduct and give full effect to the Sale Process and the Listing Agreement including but not limited to, taking any additional steps or executing additional documents as may be necessary or desirable in order to carry out and complete the Sale Process.

Actions of the Receiver

4. The Receiver’s activities as set out in the Report including the Interim Statement of Receipts and Disbursements attached as Appendix “B” therein, and the Confidential Supplement, are hereby ratified and approved.

Professional Fees

5. The professional fees of the Receiver and its legal counsel, Cassels Brock & Blackwell LLP, as set out at paragraph 90 of the Report, are hereby ratified and approved without a formal passing of accounts.

Production of Missing Information

6. Choudhry Qadeer Akram, Bulland Cheema and Saima Qadeer (collectively, the “**Directors**”) are hereby jointly ordered to deliver to the Receiver, by no later than March 25, 2024 (the “**Deadline**”), the following records and information on a best-efforts basis:

- (a) all notes referenced in and accompanying the financial statements previously provided for the years 2015 through 2022;
- (b) copies of the registration, loan/lease documents and current amounts owing in relation to the 2022 Dodge Ram 1500 (serial no. 1C6SRFVT8NN475790), 2014 BMW 528XI, 2023 Lexus LX600 and any other vehicles used in connection with the business;
- (c) a copy of the Certas H&A insurance policy;
- (d) all loan documentation and statement of current amounts owing in relation to the Business Development Bank of Canada loan;
- (e) all municipal, provincial and federal tax documents received for the period of January 2023 to present;
- (f) list of any other loan or credit obligations of BRM and copies of all loan documentation and statements of current amounts owing in relation to same;
- (g) documentation of any other amounts owing by BRM to all other creditors of BRM aside from Royal Bank of Canada;
- (h) Lease Renewal Agreement dated January 1, 2021 between BRM and Zealous Granite & Tile Ltd;
- (i) all correspondence sent or received in relation to the terms of the lease arrangement entered into with Icon Kitchen Cabinets Ltd.;
- (j) details of any other bank accounts held by BRM or where revenue of BRM has been deposited, including bank statements for the preceding 24-month period; and
- (k) list of any other property or assets of any nature or kind of BRM not already identified in written correspondence from the Directors to the Receiver

(collectively, the “**Missing Information**”).

7. In the event the Directors fail to provide the Missing Information to the Receiver on or before the Deadline, the Receiver shall be entitled to appear before this Honourable Court at a date and time selected by the Receiver, during which time the Directors shall be required to show cause as to why they shall not be held in contempt of Court.

8. The Directors shall be required to provide any additional records and information reasonably requested by the Receiver following the Deadline within 7 days of the Receiver's request.

Service

9. Service of this order shall be deemed good and sufficient by serving same on the persons and manner listed on the service list in these proceedings and by posting a copy of it on the Receiver's website at: [home.kpmg/ca/brmcanada](http://home.kpmg/ca/brmcanada).

  
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Justice of the Court of King's Bench