

COURT FILE NUMBER 1801-06866
COURT COURT OF QUEEN'S
BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY



APPLICANT ATB FINANCIAL
RESPONDENTS MUSTANG WELL SERVICES LTD., KKSER ENTERPRISES LTD.,
COMPLETE OILFIELD MANUFACTURING INC., REACTION
OILFIELD SUPPLY (2012) LTD., AND MRBD LTD.

DOCUMENT **SEALING ORDER**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
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File No. 45306-7

I hereby certify this to be a true copy of
the original Order
Dated this 5 day of Sept
for Clerk of the Court

Attention: Jeffrey Oliver/Danielle Marechal

DATE ON WHICH ORDER WAS PRONOUNCED: September 5, 2018

LOCATION OF HEARING: Calgary, Alberta

NAME OF JUDGE WHO MADE THIS ORDER: The Honourable Madam Justice M.H. Hollins

UPON THE APPLICATION of FTI Consulting Canada Inc. in its capacity as receiver and manager (in such capacity, the "**Receiver**") of the assets, properties and undertakings of Mustang Well Services Ltd., KKSER Enterprises Ltd., Complete Oilfield Manufacturing Inc., Reaction Oilfield Supply (2012) Ltd., and MRBD Ltd. (collectively, the "**Debtors**") for, among other things: (i) an order approving the sale transaction contemplated by an assets purchase agreement made as of July 31, 2018 between the Receiver and 877232 Alberta Ltd. (the "**Transaction**"); and (ii) approving an auction services agreement between the Receiver and Tiger Capital Group, LLC pursuant to which one or more auction transactions may be completed (the "**Auction Transactions**"); **AND UPON HAVING READ** the Receivership Order granted by the Honourable Justice A.D. Macleod on May 17, 2018 (the "**Receivership Order**"), the First

Report of the Receiver dated August 27, 2018 (the "**First Report**"), confidential Appendices "B" through "D" to the First Report (the "**Confidential Appendices**") and the Affidavits of Service of Richard Comstock, sworn August 30, September 4 and September 5, 2018; **AND UPON** hearing from counsel for the Receiver, and such other counsel as are present;

IT IS HEREBY ORDERED AND DECLARED THAT:

1. Service of this Application and supporting materials is hereby declared to be good and sufficient, and no other person is required to have been served with notice of this application, and time for service of this application is abridged to that actually given.

Sealing of Confidential Appendix "B"

2. Division 4 Part 6 of the *Alberta Rules of Court* does not apply to this Application.
3. Confidential Appendix "B" submitted in the within proceedings shall, until the filing of a Receiver's certificate confirming that the Transaction has been completed to the satisfaction of the Receiver, or until further order of this Honourable Court, be sealed and kept confidential, to be shown only to a Justice of the Court of Queen's Bench of Alberta, and accordingly, shall be filed with the Clerk of the Court who shall keep the Confidential Appendices in a sealed envelope, which shall clearly be marked "SEALED PURSUANT TO THE ORDER OF THE HON. MADAM JUSTICE M.H. HOLLINS DATED SEPTEMBER 5, 2018".

Sealing of Confidential Appendices "C" and "D"

4. Division 4 Part 6 of the *Alberta Rules of Court* does not apply to this Application.
5. Confidential Appendices "C" and "D" submitted in the within proceedings shall, until the filing of a Receiver's certificate confirming that the Auction Transactions have been completed to the satisfaction of the Receiver, or until further order of this Honourable Court, be sealed and kept confidential, to be shown only to a Justice of the Court of Queen's Bench of Alberta, and accordingly, shall be filed with the Clerk of the Court who shall keep the Confidential Appendices in a sealed envelope, which shall clearly be marked "SEALED PURSUANT TO THE ORDER OF THE HON. MADAM JUSTICE M.H. HOLLINS DATED SEPTEMBER 5, 2018".

6. Any party may apply to set aside paragraphs 3 or 5 of this order upon providing the Receiver and all other interest parties with five (5) days notice of such application.
7. This Order must be served only upon those interested parties attending or presented at the within application and service may be effected by facsimile, electronic mail, personal delivery or courier. Service is deemed to be effected the next business day following the transmission or delivery of such documents.
8. Service of this Order on any party not attending this application is hereby dispensed with.


J.C.Q.B.A.