



COURT NO. B131552
ESTATE NO. 11-1820752
VANCOUVER REGISTRY

**SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY**

**IN THE MATTER OF THE BANKRUPTCY OF
0409725 B.C. LTD.**

NOTICE OF MOTION

Name of applicant: G. Powroznik Group Inc. of G-Force Group (the "Applicant")

To: The creditors of 0409725 B.C. Ltd.

TAKE NOTICE that an application will be made by the Applicant to Mr. Justice Grauer in chambers at the courthouse at 800 Smithe Street, Vancouver, British Columbia on Friday, December 14, 2018 at 10:00 a.m. for an order in the form attached as Schedule "A" hereto.

At the hearing of the application, the Applicant will rely on the following:

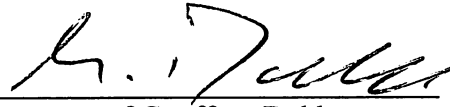
1. First Report of the Trustee dated December 18, 2013;
2. Order of Mr. Justice Grauer dated December 19, 2013;
3. Preliminary Report of the Trustee dated January 7, 2014;
4. First Report of the Claims Administrator dated February 16, 2014;
5. Order of Mr. Justice Grauer dated February 18, 2014;
6. Second Report of the Claims Administrator dated June 6, 2014;
7. Summary Report of the Claims Administrator dated June 30, 2014;
8. Reasons for Judgment of Mr. Justice Grauer dated June 30, 2014;
9. Reasons for Judgment of Mr. Justice Grauer dated April 14, 2015;
10. Third Report of the Claims Administrator dated June 2, 2015;
11. Order of Mr. Justice Grauer dated July 16, 2015;
12. Second Report of the Trustee dated September 16, 2018;
13. Fourth Report of the Claims Administrator dated September 17, 2018;
14. Order of Mr. Justice Grauer dated September 28, 2018;

15. Third Report of the Trustee dated November 14, 2018;
16. Fifth Report of the Claims Administrator dated November 14, 2018;
17. Affidavit of Gary Powroznik made November 14, 2018;
18. Affidavit of Stephanie Donay made November 14, 2018; and
19. Affidavit of Allan Perry made November 14, 2018.

Mr. Justice Grauer is seized of these proceedings.

The Applicant anticipates that the application may be contentious and estimates that the application will take two hours to one day to be heard.

Dated: November 14, 2018



Signature of Geoffrey Dabbs,
Lawyer for the Applicant,
G. Powroznik Group Inc. of G-Force Group,
Court-Appointed Claims Administrator

This Notice of Motion is delivered by Geoffrey Dabbs of the firm of Gehlen Dabbs whose place of business and address for delivery is Suite 1201, 1030 West Georgia Street, Vancouver, British Columbia, V6E 2Y3, Telephone: 604.642.6422.

SCHEDULE "A"

COURT NO. B131552
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VANCOUVER REGISTRY

**IN THE SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY**

**IN THE MATTER OF THE BANKRUPTCY OF
0409725 B.C. LTD.**

ORDER MADE AFTER APPLICATION

BEFORE))	
)	THE HONOURABLE JUSTICE GRAUER)	14/DEC/2018
))	

ON THE APPLICATION OF G. Powroznik Group Inc. of G-Force Group, in its capacity as the court-appointed claims administrator (the "Claims Administrator") in these proceedings, coming on for hearing at Vancouver, British Columbia on December 14, 2018 and on hearing Geoffrey Dabbs, counsel for the Claims Administrator; Magnus Verbrugge, counsel for G. Powroznik Group Inc. of G-Force Group, in its capacity as the trustee in bankruptcy (the "Trustee") in these proceedings; and those other counsel or parties listed in Schedule "A" to this order; AND UPON READING the material filed, including:

- a) First Report of the Trustee dated December 18, 2013;
- b) Preliminary Report of the Trustee dated January 7, 2014;
- c) First Report of the Claims Administrator dated February 16, 2014;
- d) Second Report of the Claims Administrator dated June 6, 2014;
- e) Summary Report of the Claims Administrator dated June 30, 2014;
- f) Third Report of the Claims Administrator dated June 2, 2015;
- g) Second Report of the Trustee dated September 16, 2018;
- h) Fourth Report of the Claims Administrator dated September 17, 2018;
- i) Third Report of the Trustee dated November 14, 2018; and
- j) Fifth Report of the Claims Administrator dated November 14, 2018,

(collectively, the "Reports")

and the affidavits of:

- a) Gary Powroznik made November 14, 2018;
- b) Stephanie Donay made November 14, 2018; and
- c) Allan J. Perry made November 14, 2018,

(collectively, the "Fee Affidavits");

THIS COURT ORDERS that:

1. The activities of the Claims Administrator and the Trustee, as set out in the Reports, are hereby approved.
2. The distribution, as set out in the Reports, of the Trust Funds and Holdback collected under the Trust Claim Settlement Program (each capitalized term as defined in the Reports), is hereby approved.
3. The fees and disbursements of the Claims Administrator and its counsel and the Trustee and its counsel, as set out in the Fifth Report of the Claims Administrator and as set out in the Fee Affidavits, are hereby approved.
4. After payment of the fees and disbursements of the Claims Administrator and the Trustee, including the fees and disbursements of their respective counsel, the Claims Administrator shall disburse all funds remaining in its hands in accordance with the order dated July 16, 2015 in these proceedings, as modified based upon the recommendations of the Claims Administrator in the Fourth Report and the Fifth Report.
5. The Claims Administrator shall pay into court in these proceedings any balance of Trust and Lien Funds (each capitalized term as defined in the Reports) that remain in the Claims Administrator's possession 200 days:
 - a) after payments are sent to Trust and Lien Claimants (each capitalized term as defined in the Reports) and they are not cashed or otherwise claimed by that date; or
 - b) after reasonable attempts are made by the Claims Administrator to locate any Trust and Lien Claimants whose addresses are unknown.
6. Upon payment of the amounts set out in paragraphs 4 and 5 of this order and upon the Claims Administrator filing a certificate certifying that it has completed the remaining outstanding activities described in the Fourth Report and the Fifth Report, the Claims Administrator shall be discharged as Claims Administrator, provided that notwithstanding its discharge:
 - a) the Claims Administrator shall remain Claims Administrator for the performance of such incidental duties as may be required to complete the administration of the Trust Claim Settlement Program in accordance with the order dated December 19, 2013 in these proceedings and any amendments thereto; and
 - b) the Claims Administrator shall continue to have the benefit of the provisions of all Orders made in this proceeding, including all approvals, protections and stays of proceedings in favour of G. Powroznik Group Inc. of G-Force Group in its capacity as Claims Administrator.
7. Notwithstanding any provision herein, this order shall not affect any person to whom notice of these proceedings was not delivered as required by the *Bankruptcy and Insolvency Act* and regulations thereto, any other applicable enactment or any other order of this Court.

8. Endorsement of this order by counsel and parties appearing at this hearing, as set out in Schedule "A" to this order, is hereby dispensed with.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER:

Signature of Geoffrey Dabbs,
Lawyer for the Claims Administrator

Signature of Magnus Verbrugge,
Lawyer for the Trustee

By the Court

Registrar

SCHEDULE "A"

<u>Party</u>	<u>Counsel (if applicable)</u>