

**SCHEDULE “A”
NOTICE OF SECOND CLAIMS PROCESS TO CLAIMANTS AND UNKNOWN
INTEREST HOLDERS**

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

MIZUE FUKIAGE, AKIKO KOBAYASHI, YOSHIKI FUKIAGE, KOBAYASHI KYOHODO
CO., LTD., TORU FUKIAGE, and KWANG-CHENG (TONY) WEI, IN HIS PERSONAL
CAPACITY AS A TAIWANESE INVESTOR AND IN HIS CAPACITY AS AGENT FOR
THE OTHER TAIWANESE INVESTORS

Applicants

- and -

CLEARVIEW GARDEN ESTATES INC., TALBOT CROSSING INC., NIAGARA ESTATES
OF CHIPPAWA II INC., LONDON VALLEY INC., LONDON VALLEY II INC., LONDON
VALLEY III INC., LONDON VALLEY IV INC., LONDON VALLEY V INC., FORT ERIE
HILLS INC., 2533430 ONTARIO INC., CGE CAPITAL MANAGEMENT INC., TGP-
TALBOT CROSSING INC., NEC II CAPITAL MANAGEMENT INC., LV CAPITAL
MANAGEMENT INC., LV II CAPITAL MANAGEMENT INC., LV III CAPITAL
MANAGEMENT INC., LV IV CAPITAL MANAGEMENT INC., LV V CAPITAL
MANAGEMENT INC., FORT ERIE HILLS CAPITAL MANAGEMENT INC., HALTON
PARK INC., NIAGARA FALLS PARK INC., TSI-HP INTERNATIONAL CANADA INC.,
TSI INTERNATIONAL-GRANDTAG A2A NIAGARA IV INC., GREENVALLEY ESTATES
INC., GREENVALLEY ESTATES II INC., LYONS CREEK NIAGARA FALLS PARK INC.,
GREENVALLEY ESTATES CANADA INC., TSI INTERNATIONAL-GRANDTAG A2A GE
II INC., and TGP – LYONS CREEK NIAGARA FALLS PARK INC.

Respondents

By Order of the Ontario Superior Court of Justice (Commercial List) dated September 28, 2026 (as may be amended from time to time, the “**Order**”), AlixPartners Restructuring, Inc. (formerly known as KSV Restructuring Inc.), solely in its capacity as Court-appointed receiver and manager in these proceedings (the “**Receiver**”), has been authorized to conduct a procedure (the “**Second Claims Process**”) to, among other things, identify and quantify certain claims against the following entities (collectively, the “**Specified Respondents**”):

**GREENVALLEY ESTATES INC.
GREENVALLEY ESTATES II INC.
LYONS CREEK NIAGARA FALLS PARK INC.
GREENVALLEY ESTATES CANADA INC.
TSI INTERNATIONAL-GRANDTAG A2A GE II INC.
TGP – LYONS CREEK NIAGARA FALLS PARK INC.**

All capitalized but undefined terms are defined in the Order.

TAKE NOTICE that, in accordance with the Order, the Receiver is delivering this notice to each Known Claimant and causing this notice to be published for the purpose of notifying Claimants and Unknown Interest Holders in connection with the Second Claims Process.

This notice provides general instructions to Claimants regarding the Second Claims Process and the completion and submission of a Proof of Claim.

The Order and other materials related to the Receivership Proceeding are available on the Receiver's website at <https://cdncases.alixpartners.com/experience/case/clearviewgarden> or may be obtained by email from the Receiver at KSV-ontariolandbankingreceivership@alixpartners.com. We recommend reviewing the Order carefully before submitting a Proof of Claim or otherwise participating in this Second Claims Process.

General information about the Receivership Proceeding is available on Representative Counsel's website at <https://gowlingwlg.com/en-ca/ca/ontario-land-banking-counsel>.

FILING A CLAIM

Any Person wishing to assert a Claim (other than an Excluded Claim) against one or more of the Specified Respondents must deliver to the Receiver one Proof of Claim for each Specified Respondent against which a Claim is asserted **before 5:00 p.m. (Toronto time) on January 26, 2027** (the "**Claims Bar Date**").

The Proof of Claim form is attached as Appendix "A" hereto. The form may be delivered by email or, if email is unavailable, by regular mail, prepaid registered mail, courier, or personal delivery to the address set out below:

ALIXPARTNERS RESTRUCTURING, INC.

Court-appointed Receiver
220 Bay St., Suite 1300
Toronto, ON M5J 2W4

Email: KSV-ontariolandbankingreceivership@alixpartners.com

with a copy to:

AIRD & BERLIS LLP

Barristers and Solicitors
181 Bay Street, Suite 1800
Toronto, ON M5J 2T9

Email: ontariolandbankingreceivership@airdberlis.com

IF YOUR PROOF OF CLAIM IS NOT RECEIVED BY THE RECEIVER PRIOR TO 5:00 P.M. (TORONTO TIME) ON THE CLAIMS BAR DATE, YOUR CLAIM AGAINST THE APPLICABLE RESPONDENT(S) WILL BE FOREVER BARRED AND EXTINGUISHED, AND YOU WILL NOT BE PERMITTED TO PARTICIPATE IN ANY DISTRIBUTION RELATED TO SUCH CLAIM. CLAIMANTS ARE RESPONSIBLE FOR ENSURING THAT THE RECEIVER RECEIVES THEIR PROOF OF CLAIM PRIOR TO 5:00 P.M. ON THE CLAIMS BAR DATE.

Even if you have previously provided information to the Receiver concerning a Claim, please re-submit that information with your Proof of Claim. All Proofs of Claim must be completed in English.

All Claims must be denominated in the original currency in which they arose. Where no currency is indicated, the Claim will be presumed to be in Canadian dollars. For Claims denominated in currencies other than Canadian dollars, the Receiver will convert such Claims into Canadian dollars using the Bank of Canada Canadian Dollar Daily Exchange Rate applicable on the Appointment Date.

The Receiver expressly reserves the right, on behalf of any of the Specified Respondents, to assert any affirmative claim or counterclaim against any Claimant.

A Proof of Claim may be revised or disallowed by the Receiver in accordance with the procedures set out in the Order.

All Proofs of Claim and notices concerning the Second Claims Process should be directed to the Receiver at the address set out above.

If you have questions or require assistance with completing a Proof of Claim, you may contact Representative Counsel at the address set out below:

GOWLING WLG (CANADA) LLP

Representative Counsel
1 First Canadian Place
100 King Street West, Suite 1600
Toronto, ON M5X 1G5

Email: ontariolandbankingcounsel@gowlingwlg.com

DATED this ____ day of _____, 20__.

AlixPartners Restructuring, Inc.,
solely in its capacity as Receiver in these proceedings
and not in its personal or corporate capacity

**APPENDIX “A”
PROOF OF CLAIM**

[To be appended.]