

**SCHEDULE “B”
NOTICE OF SECOND CLAIMS PROCESS TO 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 the books and records of the Specified Respondents indicate that you are an Interest Holder in the Property, or a portion thereof, of one or more of the Specified Respondents.

For greater certainty, an Interest Holder (other than an Unknown Interest Holder) is not required to file a Proof of Claim or take any other steps to prove or otherwise confirm the validity or quantum of its Interest Holder Claim, provided that the Holdings Information is accurate. Interest Holder Claims are Excluded Claims and will not be barred as part of the Second Claims Process.

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 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>.

ACTION REQUIRED

The Holdings Information relating to you is set out in Appendix "A" to this notice. **Please carefully review that information.**

If you:

1. agree with the Holdings Information set out in Appendix "A"; and
2. have not received any redemption payments in respect of this investment,

you do not need to take any further steps, and such Holdings Information shall be deemed correct and confirmed.

If you:

1. disagree with the Holdings Information set out in Appendix "A"; or
2. have received any redemption payments in respect of this investment,

complete and file with the Receiver an Amendment Request, substantially in the form attached as Appendix "B" prior to 5:00 p.m. (Toronto time) on January 26, 2027 (the "**Claims Bar Date**"). One Amendment Request must be submitted for each Specified Respondent in respect of which you dispute or seek to amend the Holdings Information or indicate redemption payments received. Each Amendment Request must include all relevant supporting documentation. We direct you to paragraphs 8 to 12 of the Order for information regarding the filing of an Amendment Request and the process for resolving any issues in connection with same.

The Amendment Request 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 YOU DO NOT DELIVER AN AMENDMENT REQUEST TO THE RECEIVER PRIOR TO 5:00 P.M. (TORONTO TIME) ON THE CLAIMS BAR DATE, THE HOLDINGS INFORMATION SET OUT IN APPENDIX “A” WILL BE DEEMED CORRECT AND CONFIRMED BY YOU. INTEREST HOLDERS ARE RESPONSIBLE FOR ENSURING THAT THE RECEIVER RECEIVES THEIR AMENDMENT REQUEST PRIOR TO 5:00 P.M. ON THE CLAIMS BAR DATE.

All Amendment Requests must be completed in English.

An Amendment Request may be revised or disallowed by the Receiver in accordance with the procedures set out in the Order.

All Amendment Requests 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 an Amendment Request, you may contact Representative Counsel at the address 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

CLAIMS BY INTEREST HOLDERS

The fact that you are an Interest Holder or that your Holdings Information is correct and confirmed does not prevent you from asserting a separate Claim. For greater certainty, an Interest Holder (other than an Unknown Interest Holder) is not required to file a Proof of Claim or take any other steps to prove or otherwise confirm the validity or quantum of its Interest Holder Claim, provided that the Holdings Information is accurate.

If you wish to assert a Claim (other than an Excluded Claim) against one or more of the Specified Respondents, you must deliver to the Receiver, before 5:00 p.m. (Toronto time) on the Claims Bar Date, a separate Proof of Claim for each Specified Respondent against which a Claim is asserted. A Proof of Claim form is attached as Appendix “C”.

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 above.

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”
HOLDINGS INFORMATION**

[To be appended.]

**APPENDIX “B”
AMENDMENT REQUEST**

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
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TALBOT CROSSING INC., NEC II CAPITAL MANAGEMENT INC., LV CAPITAL
MANAGEMENT INC., LV II CAPITAL MANAGEMENT INC., LV III CAPITAL
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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

PLEASE NOTE THAT ALL AMENDMENT REQUESTS MUST BE FILED WITH THE
RECEIVER BY NO LATER THAN 5:00 P.M. (TORONTO TIME) ON JANUARY 26, 2027. IF
AN AMENDMENT REQUEST IS NOT FILED BY SUCH DATE, THE HOLDINGS
INFORMATION SET OUT IN THE NOTICE TO INTEREST HOLDERS DELIVERED TO
YOU SHALL BE DEEMED CORRECT AND CONFIRMED.

This form must be completed in English.

Please submit one Amendment Request per Specified Respondent in respect of which you dispute
or seek to amend the Holdings Information or indicate redemption payments received.

This Amendment Request is in respect of the following Specified Respondent/investment property:

_____ (Please complete)

A. Particulars of Interest Holder

(1) Full Legal Name of Interest Holder:

(2) Full Mailing Address of Interest Holder:

(3) Telephone Number:

(4) Email Address:

(5) Attention (Contact Person):

B. Redemption Information

The Interest Holder has issued a notice of redemption and/or received payments in respect of the noted Specified Respondent/investment property as particularized below (provide all relevant supporting documentation and information):

(1) Date of redemption:

(2) Amount of redemption claimed:

(3) Dates and amounts of redemption payments received to date:

C. Amendment Request

The Interest Holder disagrees with the Holdings Information set out in Appendix “A” and requests that such Holdings Information be amended as follows (please provide all relevant supporting documentation and information):

Amended Holdings Information

All Amendment Requests must be directed to the Receiver by email (and if email is not available, by regular mail, prepaid registered mail, courier, or personal delivery) at the address below, prior to 5:00 p.m. (Toronto time) on January 26, 2027.

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

**APPENDIX “C”
PROOF OF CLAIM**

[To be appended.]