COURT FILE NUMBER	2601-03446
COURT	COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE	CALGARY
	IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, RSC 1985, c C-36, AS AMENDED AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF RDFN FUM NATURAL PRODUCTS LTD. and RDFN FUM NATURAL PRODUCTS INC.
APPLICANTS	RDFN FUM NATURAL PRODUCTS LTD. and RDFN FUM NATURAL PRODUCTS INC.
DOCUMENT	**APPLICATION FOR STAY EXTENSION**

JUDICIAL CENTRE OF CALGARY
FILED DIGITALLY
2601 03446
Sep 24, 2026
8:06 AM
CLERK OF THE COURT

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

MLT AIKINS LLP
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File No. 0185373.00001

NOTICE TO RESPONDENTS:

This application is made against you. You are a respondent.

You have the right to state your side of the matter before the judge.

To do so, you must be in Court when the application is heard as shown below:

Date:	October 1, 2026
Time:	10:00 am
Where:	Calgary Courts Centre – Via WebEx https://albertacourts.webex.com/meet/virtual.courtroom60
Before:	The Honourable Justice C.D. Simard

Go to the end of this document to see what you can do and when you must do it.

REMEDY CLAIMED OR SOUGHT:

1. The Applicants, RDFN FUM Natural Products Ltd. ("**FUM**") and RDFN FUM Natural Products Inc. ("**FUM US**" and collectively with FUM, the "**FUM Group**" or the "**Applicants**") seek the following relief:

   (a) an Order pursuant to the *Companies' Creditors Arrangement Act*, RSC 1985, c C-36 (the "**CCAA**") substantially in the form attached hereto as **Schedule "A"** (the "**Third Stay Extension Order**") granting the following relief:

      (i) declaring service of this Application and its supporting materials good and sufficient and, if necessary, abridging the time for notice of the Application to the time actually given; and

      (ii) extending the Stay Period (defined below) up to and including November 30, 2026 or such further and other date as this Court may consider appropriate; and

   (b) such further and other relief as this Court may deem just and appropriate in the circumstances.

2. Capitalized terms used herein that are not otherwise defined have the meaning ascribed to them in the Plan.

GROUNDS FOR MAKING THIS APPLICATION:

Procedural History

3. The Applicants are engaged in the development, production, and sale of nicotine-free, smokeless, vaporless, non-electronic flavoured air devices under the FUM brand (the "**Products**"). The Products are an alternative health product, frequently used as a behavioral aid for individuals seeking to cease their smoking or vaping habits.

4. The Applicants experienced financial strain as a result of tariffs imposed in the United States, significantly increased advertising costs, and a substantially increased debt burden after settling trademark litigation with BFL Metal Products Co., Ltd. ("**BFL**") that required the Applicants to, among other things, pay $100,000 each month to BFL.

5. Due to the strain on their liquidity, on February 4, 2026, the Applicants each filed a Notice of Intention to Make a Proposal (the "**NOIs**") under section 50.4 of the Bankruptcy and Insolvency Act, RSC 1985, c B-3 (the "**BIA**", and such proceedings, the "**Proposal Proceedings**"). Alvarez and Marsal Canada Inc. ("**A&M**") was appointed as the proposal trustee of the Applicants.

6. On March 2, 2026 (the "**Filing Date**"), the Honourable Justice J.T. Neilson granted an Initial Order pursuant to the CCAA (the "**Initial Order**") which, among other things, granted a stay of proceedings for an initial ten (10) day period (the "**Stay Period**") and appointed Alvarez & Marsal Canada Inc. as the Monitor of the Applicants (the "**Monitor**").

7. On March 12, 2026, the Honourable Justice J.S. Little granted the ARIO, which, among other things, extended the Stay Period up to and including May 26, 2026, approved an Administration Charge up to the maximum amount of $500,000, approved a Directors' Charge up to the maximum amount of $200,000, and authorized FUM to act as the Foreign Representative on behalf of itself and FUM US for the purpose of having the CCAA Proceedings recognized in the United States.

8. On April 23, 2026, the Honourable Justice A.G. Kuntz granted an Order extending the Stay Period up to and including July 31, 2026 (the "**First Stay Extension Order**"). The First Stay Extension Order of Justice A.G. Kuntz further extended the stay of proceedings in favour of the current and former directors, officers and employees of the Applicants (the "**Guarantee Stay Parties**") to stay enforcement against any guarantees granted by the Applicants' current or former directors, officers, or employees, including certain guarantees granted in favour of Business Development Bank of Canada by the Applicants' directors, including Braeden Pauls, Daniel Ogden, and Josiah Pauls (collectively the "**Guaranteed Claims**").

9. Also on April 23, 2026, the Honourable Justice A.G. Kuntz granted a Claims Process Order (the "**Claims Process Order**"), which provided for a Claims Bar Date of June 15, 2026. The Claims Process Order provided claimants with seven calendar days to submit a Notice of Dispute in response to any Notice of Revision or Disallowance issued by the Monitor and required such claimants to schedule an application with the Court of King's Bench of Alberta within 14 days of issuing the Notice of Dispute.

10. On July 27, 2026, the Honourable Justice R.W. Armstrong granted an Order extending the Stay Period up to and including October 2, 2026, approving a Key Employee Retention Plan (the "**KERP**") and corresponding KERP Charge up to the amount of $100,000, and approving the Monitor's actions and activities to date (the "**Second Stay Extension Order**"). Pursuant to the Second Stay Extension Order, the stay of proceedings granted in favour of the Guarantee Stay Parties was further extended up to and including October 2, 2026.

11. On August 28, 2026, the Honourable Justice C.D. Simard granted an Order (the "**First Creditors' Meeting Order**") that, among other things: (a) accepted the Plan for filing; (b) authorized the classification of creditors for purposes of voting on the Plan into two classes: Affected Secured Creditors and Affected Unsecured Creditors; (c) authorized and directed FUM to call, hold, and conduct a meeting of creditors to vote on a resolution to approve the Plan (the "**Meeting**"); (d) authorized and directed the mailing and distribution of the Creditors' Meeting Materials; and (e) set a date for the hearing of the application for a Sanction Order.

12. On September 22, 2026, the Honourable Justice C.D. Simard granted an Order amending the Creditor's Meeting Order to, among other things, authorize the Applicants, in consultation with the Montior, to adjourn and re-schedule the Meeting (the "**Amended Creditor's Meeting Order"** and the First Creditor's Meeting Order are collectively referred to as the "**Creditor's Meeting Order**").

13. Pursuant to the Creditors' Meeting Order, the Meeting was initially scheduled for September 18, 2026. It was subsequently adjourned twice, first to September 23, 2026 and then to September 25, 2026. These adjournments were required to give the FUM Group time to conclude discussions with certain key stakeholders.

14. If the Requisite Majority vote in favour of the Plan at the Meeting, the Applicants intend on filing an additional application for an Order sanctioning the Plan to be heard concurrently with this Application.

The Stay Extension Order is Appropriate

15. The stay of proceedings granted by the Initial Order and subsequently extended by the ARIO, the First Stay Extension Order, and the Second Stay Extension Order, currently expires on October 2, 2026 (the "**Stay Period**").

16. Pursuant to the First Stay Extension Order and the Second Stay Extension Order, the stay of proceedings was extended to include a stay of all Guarantee Claims in favour of the Guarantee Stay Parties.

17. The Applicants are seeking a further extension of the Stay Period up to and including November 30, 2026 (the "**Stay Extension**"). Additionally, the Applicants seek to continue the stay of the Guarantee Claims to coincide with the Stay Extension.

18. The Applicants require an extension of the Stay Period to, among other things:

    (a) hold the Meeting in accordance with the Creditor's Meeting Order;

    (b) if the Required Majority votes in favour of the Plan, apply for an Order sanctioning the Plan;

    (c) implement the Plan, and attend to various post-closing and post-implementation matters.

19. The Plan contemplates an Outside Date of November 30, 2026, as such the requested extension of the Stay Period to November 30, 2026 is reasonable in the circumstances.

20. The Applicants have acted, and continue to act, in good faith and with due diligence to, among other things, operate their Business in the ordinary course and to advance these CCAA proceedings.

21. Approving the extension of the Stay Period is in the best interest of all stakeholders as it will provide the Applicants and the Monitor with the time and space required to implement the Plan and emerge as a going-concern business.

MATERIAL OR EVIDENCE TO BE RELIED UPON:

22. The ARIO, First Stay Extension Order and Second Stay Extension Order;

23. The First Affidavit of Braeden Pauls, filed February 24, 2026;

24. The Second Affidavit of Braeden Pauls, filed March 6, 2026;

25. The Third Affidavit of Braeden Pauls, filed April 15, 2026;

26. The Fourth Affidavit of Braeden Pauls, sworn July 20, 2026;

27. The Confidential Supplement to the Fourth Affidavit of Braeden Pauls, sworn July 20, 2026;

28. The Fifth Affidavit of Braeden Pauls, sworn August 19, 2026;

29. Supplemental Affidavit of Braeden Pauls, sworn August 20, 2026;

30. The Sixth Affidavit of Braeden Pauls, sworn September 23, 2026;

31. The First Report of the Proposal Trustee and Proposed Monitor, dated February 26, 2026;

32. The First Report of the Monitor, dated March 10, 2026;

33. The Second Report of the Monitor, dated April 17, 2026;

34. The Third Report of the Monitor, dated July 21, 2026;

35. The Fourth Report of the Monitor, dated August 21, 2026;

36. The Fifth Report of the Monitor, to be filed; and

37. Such further and other materials as counsel for the Monitor or the Applicants may advise and this Honourable Court may permit.

APPLICABLE RULES:

38. Part 6, Division 1 of the Alberta *Rules of Court*, Alta Reg 124/2010.

APPLICABLE ACTS AND REGULATIONS:

39. The *Companies' Creditors Arrangement Act*, RSC 1985, c C-36; and

40. Such further and other Acts or regulations as counsel may advise and this Honourable Court may permit.

ANY IRREGULARITY COMPLAINED OF:

41. None.

HOW THE APPLICATION IS PROPOSED TO BE HEARD OR CONSIDERED:

42. In person or by videoconference before the Honourable Justice C.D. Simard at the Calgary Courts Centre, or as may be directed by the Court.

WARNING

If you do not come to Court either in person or by your lawyer, the Court may give the applicant what they want in your absence. You will be bound by any order that the Court makes. If you want to take part in this application, you or your lawyer must attend in Court on the date and at the time shown at the beginning of the form. If you intend to give evidence in response to the application, you must reply by filing an affidavit or other evidence with the Court and serving a copy of that affidavit or other evidence on the applicant a reasonable time before the application is to be heard or considered.

SCHEDULE “A”

FORM OF STAY EXTENSION ORDER

COURT FILE NUMBER	2601-03446
COURT	COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE	CALGARY
	IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, RSC 1985, c C-36, AS AMENDED AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF RDFN FUM NATURAL PRODUCTS LTD. and RDFN FUM NATURAL PRODUCTS INC.
APPLICANTS	RDFN FUM NATURAL PRODUCTS LTD. and RDFN FUM NATURAL PRODUCTS INC.
DOCUMENT	**ORDER – STAY EXTENSION**
ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	**MLT AIKINS LLP** Barristers and Solicitors #2100 – 222 3rd Ave SW Calgary, AB T2P 0B4 Attention: Ryan Zahara / Chris Nyberg Telephone: (403) 693-5420 / 4311 Email: rzahara@mltaikins.com cnyberg@mltaikins.com File No. 0185373.00001

DATE ON WHICH ORDER WAS PRONOUNCED:	**OCTOBER 1, 2026**
LOCATION WHERE ORDER WAS PRONOUNCED:	**CALGARY, ALBERTA**
NAME OF JUSTICE WHO MADE THIS ORDER:	**THE HONOURABLE JUSTICE C. D. SIMARD**

UPON the application (the "**Application**") of RDFN FUM Natural Products Ltd. ("**FUM**") and RDFN FUM Natural Products Inc. ("**FUM US**", and collectively with FUM, the "**Applicants**" or "**FUM Group**") for an Order granting, among other things, an extension of the Stay Period pursuant to the *Companies' Creditors Arrangement Act*, RSC 1985, c C-36, as amended (the "**CCAA**");

AND UPON having read the Application, the Amended and Restated Initial Order granted in these proceedings on March 12, 2026 by the Honourable Justice J.S. Little (the "**ARIO**"), the Order (Stay Extension and Guarantee Stay) granted by the Honourable Justice A.G. Kuntz dated April 23, 2026 (the "**First Stay Extension Order**"), and the Order (Stay Extension, KERP and KERP Charge) granted by the Hnourable Justice R.W. Armstrong (the "**Second Stay Extension Order"); AND UPON** reading the Sixth Affidavit of Braeden Pauls, sworn September 23, 2026 (the "**Sixth Pauls Affidavit**"), and the Affidavit of Service of Elvina Hussein sworn _____, 2026; **AND UPON** having read the Fifth Report of the Monitor (the "**Fifth Report**"); **AND UPON** hearing counsel for the Applicants, the Monitor, and counsel for any other parties present;

IT IS HEREBY ORDERED AND DECLARED THAT:

SERVICE

1. The time for service of the notice of the Application and the materials filed in connection therewith are hereby abridged and service thereof is deemed good and sufficient, and this Application is properly returnable today.

DEFINED TERMS

2. All capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the ARIO or the Second Stay Extension Order as context may require.

STAY EXTENSION

3. The stay of proceedings is hereby extended by amending paragraph 14 of the ARIO (as amended by the First Stay Extension Order and the Second Stay Extension Order) by deleting the date "October 2, 2026" and replacing it with the date "November 30, 2026".

GUARANTEE STAY

4. During the Stay Period, no Proceeding shall be commenced or continued against or in respect of any of the Guarantee Stay Parties with respect to any Guarantee Claims, except with leave of this Court, and any and all Proceedings currently under way against or in respect of the Guarantee Stay Party in relation to any Guarantee Claims are hereby stayed and suspended pending further order of this Court.

SERVICE OF ORDER

5. Service of this Order shall be deemed good and sufficient:

a) by serving same on the persons who were served with notice of this Application and any other parties attending or represented at the hearing of the Application; and

b) by posting a copy of this Order on the Monitor's website at https://www.alvarezandmarsal.com/FUM.

The Honourable Justice C.D. Simard

Justice of the Court of King's Bench of Alberta