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	**SIXTH AFFIDAVIT OF BRAEDEN PAULS**

Clerk's stamp

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Sep 24, 2026
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CLERK OF THE COURT

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

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File No. 0185373.00001

SIXTH AFFIDAVIT OF BRAEDEN PAULS
Sworn on September 23, 2026

I, Braeden Pauls, of the City of Calgary, in the Province of Alberta, SWEAR AND SAY THAT:

1. I am the Chief Executive Officer and a director of RDFN FUM Natural Products Ltd. ("**FUM**") and RDFN FUM Natural Products Inc. ("**FUM US**", and together with FUM, the "**FUM Group**" or the "**Applicants**"). As such, I have personal knowledge of the matters deposed to in this Affidavit, except where stated to be based on information and belief, in which case, I verily believe the same to be true.

2. As a director and officer, I am responsible for managing the Applicants' overall operations and resources and making strategic business decisions. I have been in my current role as a director and officer of the FUM Group since its inception.

I. RELIEF SOUGHT

3. This affidavit (the "**Sixth Affidavit**") is sworn in support of an application scheduled for October 1, 2026 for an Order extending the Stay Period (defined below) up to and including November 30, 2026 (the "**Stay Extension**").

4. All capitalized terms used herein that are not otherwise defined have the meaning ascribed to them in the Plan.

II. BACKGROUND

5. The FUM Group is 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.

6. 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.

7. 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 & Marsal Canada Inc. ("**A&M**") was appointed as the proposal trustee of the Applicants.

8. 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**").

9. On March 12, 2026, the Honourable Justice J.S. Little granted the Amended and Restated Initial Order (the "**ARIO**") which, among other things:

   (a) extended the Stay Period up to and including May 26, 2026;

(b) approved an Administration Charge up to the maximum amount of $500,000;

(c) approved a Directors' Charge up to the maximum amount of $200,000; and

(d) 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.

10. On March 30, 2026, the CCAA Proceedings were recognized under Chapter 15 of the United States Bankruptcy Code pursuant to an Order of the United States Bankruptcy Court for the District of Nevada (Case No. BK-26-11021-hlb) (the "**Chapter 15 Proceedings**").

11. On April 23, 2026, the Honourable Justice A.G. Kuntz granted the following orders:

(a) an Order extending the Stay Period up to and including July 31, 2026 (the "**First Stay Extension Order**"), which further stayed 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 Braeden Pauls, Daniel Ogden, and Josiah Pauls; and

(b) a Claims Process Order (the "**Claims Process Order**"), which provided for a Claims Bar Date of June 15, 2026.

12. 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**").

13. 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**"); and (d) subject to approval of the Plan by Affected

Creditors at the Meeting, authorized the Applicants to make an application to the Court on October 1, 2026 seeking an Order sanctioning the Plan.

14. 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**").

15. The Meeting was initially scheduled for September 18, 2026 but was subsequently adjourned twice in accordance with the Creditor's Meeting Order. Pursuant to the First Notice of Adjournment, the Meeting was initially adjourned to September 23, 2025. From discussions with the Monitor, the Meeting was further adjourned and is currently scheduled to occur on September 25, 2026. The adjournments were necessary permit the FUM Group time to conclude discussions with certain key stakeholders. Attached hereto and marked as **Exhibits "A" and "B"** is a copy of the First Notice of Adjournment of the Creditor's Meeting and the Second Notice of Adjournment of the Creditors' Meeting, respectively.

16. 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.

III. THE STAY EXTENSION

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

18. The Applicants require the Stay Extension 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; and

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

19. The Plan Outside Date is November 30, 2026. The requested extension to November 30, 2026 is aligned with the Plan Outside Date and provides the minimum time necessary to implement the Plan and complete post-implementation matters.

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 advance these CCAA proceedings.

21. To the best of my knowledge, no stakeholder will suffer material prejudice as a result of the Stay Extension. Rather, the Applicants' stakeholders will benefit from the Stay Extension, which provides the Applicants with the time and space required to implement the Plan and emerge as a going-concern business.

22. The Fifth Cash Flow Forecast is anticipated to demonstrate that the Applicants have sufficient liquidity to satisfy their post-filing obligations as they come due, throughout the Stay Extension.

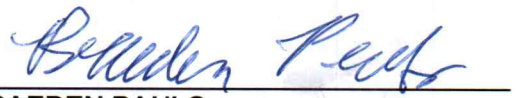
IV. CONCLUSION

23. I swear this Affidavit in support of an Application for an Order extending the Stay Period and for no other or improper purpose.

SWORN BEFORE ME at Calgary, Alberta, this 23rd day of September, 2026)



A Commission of Oaths in and for the Province of Alberta)



BRAEDEN PAULS

MYKHAILO KOZHUKHAR
STUDENT-AT-LAW

THIS IS EXHIBIT "A" TO THE
AFFIDAVIT OF BRAEDEN PAULS,
SWORN BEFORE ME AT THE CITY OF CALGARY,
IN THE PROVINCE OF ALBERTA,
THIS 23rd DAY OF SEPTEMBER, 2026



A Commissioner for Oaths in and for
the Province of Alberta

MYKHAILO KOZHUKHAR
STUDENT-AT-LAW

Alvarez & Marsal Canada Inc.
Licensed Insolvency Trustees
Bow Valley Square 4
Suite 1110
250 – 6th Avenue SW
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IN THE MATTER OF THE PROPOSED
PLAN OF COMPROMISE OR ARRANGEMENT OF
RDFN FUM NATURAL PRODUCTS LTD. AND RDFN FUM NATURAL PRODUCTS INC.

NOTICE OF ADJOURNMENT OF THE MEETING OF THE AFFECTED CREDITOR CLASS

All capitalized terms used herein and not otherwise defined have the meanings ascribed to them in the Plan and the Creditors' Meeting Order.

PLEASE TAKE NOTICE that the Creditors' Meeting scheduled for September 18, 2026 at 10:00 a.m. (MDT) is hereby adjourned to **September 23, 2026 at 10:00 a.m. (MDT)** (the "**Rescheduled Creditors' Meeting**"). The Rescheduled Creditors' Meeting is to be held by live audio webcast or telephone at:

Link: https://teams.microsoft.com/meet/287327251495556?p=VkbLE0CU9AqRqgptga
Dial-in number: +1 647-749-7010
Phone Conference ID: 247 082 915#

Affected Creditors who wish to attend the Rescheduled Creditors' Meeting should do so using the details provided above.

Any Affected Creditor Proxy validly delivered in connection with the Creditors' Meeting will remain valid and be accepted as a proxy in respect of the Rescheduled Creditors' Meeting. Affected Creditors may also submit a new or additional Affected Creditor Proxy, which must be received by the Monitor no later than 5:00 p.m. (MDT) on the date that is two (2) Business Days prior to the Rescheduled Creditors' Meeting (or any further adjournment thereof).

Except as expressly modified herein, all other terms and conditions of the Creditors' Meeting Order remain in full force and effect and are otherwise unchanged.

Yours very truly,

ALVAREZ & MARSAL CANADA INC.
in its capacity as Monitor of RDFN FUM Natural Products Ltd.
and RDFN FUM Natural Products Inc.
and not in its personal capacity

Per:

Orest Konowalchuk
Senior Vice President

THIS IS EXHIBIT "B" TO THE
AFFIDAVIT OF BRAEDEN PAULS,
SWORN BEFORE ME AT THE CITY OF CALGARY,
IN THE PROVINCE OF ALBERTA,
THIS 23rd DAY OF SEPTEMBER, 2026



A Commissioner for Oaths in and for
the Province of Alberta

MYKHAILO KOZHUKHAR
STUDENT-AT-LAW

Alvarez & Marsal Canada Inc.
Licensed Insolvency Trustees
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IN THE MATTER OF THE PROPOSED
PLAN OF COMPROMISE OR ARRANGEMENT OF
RDFN FUM NATURAL PRODUCTS LTD. AND RDFN FUM NATURAL PRODUCTS INC.

SECOND NOTICE OF ADJOURNMENT OF THE MEETING OF THE AFFECTED CREDITOR CLASS

All capitalized terms used herein and not otherwise defined have the meanings ascribed to them in the Plan and the Creditors' Meeting Order.

PLEASE TAKE NOTICE that the Creditors' Meeting is hereby further adjourned from September 23, 2026 at 10:00 a.m. (MDT) to **September 25, 2026 at 3:00 p.m. (MDT)** (the "**Rescheduled Creditors' Meeting**"). The Rescheduled Creditors' Meeting is to be held by live audio webcast or telephone at:

Link: https://teams.microsoft.com/meet/287327251495556?p=VkbLE0CU9AqRqgptga
Dial-in number: +1 647-749-7010
Phone Conference ID: 247 082 915#

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Except as expressly modified herein, all other terms and conditions of the Creditors' Meeting Order remain in full force and effect and are otherwise unchanged.

Yours very truly,

ALVAREZ & MARSAL CANADA INC.
in its capacity as Monitor of RDFN FUM Natural Products Ltd.
and RDFN FUM Natural Products Inc.
and not in its personal capacity

Per:

Orest Konowalchuk
Senior Vice President