

SUPERIOR COURT

(Commercial Division)

CANADA
PROVINCE OF QUEBEC
DISTRICT OF QUÉBEC

N°: 200-11-025040-182

Date: ●

PRESIDING: THE HONOURABLE DANIEL DUMAIS, J.S.C.

IN THE MATTER OF THE *ACT RESPECTING THE REGULATION OF THE FINANCIAL SECTOR*, CQLR, c E-6.1 of:

AUTORITÉ DES MARCHÉS FINANCIERS

Plaintiff

v.

DOMINIC LACROIX

Defendant

and

RAYMOND CHABOT ADMINISTRATEUR PROVISOIRE INC.

Receiver

CLAIMS PROCEDURE ORDER

- [1] CONSIDERING the Order dated July 5, 2018 ordering the appointment of the Receiver;
- [2] CONSIDERING the Judgment dated October 29, 2020 ordering the establishment of a simple and effective claims mechanism to be submitted to the Court;
- [3] CONSIDERING the Receiver intends to present to the Court one or more plans for the distribution of the assets it administers, including the assets frozen in Québec, which must be distributed among all the creditors of Dominic Lacroix, as well as the assets frozen in the United States, which, if sent to the Receiver by the United States Court for distribution, must be distributed among the investor creditors defined in clause 1.1.16 of the November 4, 2019 Distribution Plan;
- [4] CONSIDERING the *Demande modifiée relative au traitement des réclamations* dated March 18, 2021 of the Receiver (the “**Application**”);
- [5] CONSIDERING the representations of the attorneys for the Receiver and the *Autorité des marchés financiers*;

[6] CONSIDERING the *Act respecting the regulation of the financial sector*, CQLR, c e-6.1 and the inherent powers of the Court;

FOR THESE REASONS, THE COURT:

[7] **GRANTS** the Application.

Definitions

[8] **DECLARES** that, unless otherwise indicated, the following terms in this Order shall have the following meanings ascribed thereto:

- (a) **“AMF Press Release”** means the press release to be published on the AMF website relating to the process for filing Proofs of Claim, attached as **Schedule B** hereto.
- (b) **“AMF”** means the Autorité des marchés financiers, a legal person established by the *Act respecting the regulation of the financial sector* (Québec).
- (c) **“Business Day”** means any day, other than a Saturday or a holiday within the meaning of section 61 of the *Interpretation Act* (Québec).
- (d) **“Claim”** means all claims of any nature, present and future, certain or contingent, liquidated or unliquidated, whether or not due on the Claims Bar Date, arising out of any obligation incurred by Lacroix, including without limiting the generality of the foregoing, claims relating to the acquisition of PlexCoin in connection with the IPO and the loans solicited by either Lacroix, Sabrina Paradis-Royer, PlexCorps, DL Innov inc., Micro-Prêts inc. or FinaOne inc. in connection with the operations of the companies mentioned above, excluding the Fees and Costs of the Matter.
- (e) **“Claims Bar Date”** means [Note: Insert the date which is the 90th day after the date of the order].
- (f) **“Claims Officer”** means M^{re} Pierre Duquette, lawyer with Norton Rose Fulbright Canada LLP.
- (g) **“Court”** means the Québec Superior Court sitting in this matter.
- (h) **“Creditor”** means any Person holding a Claim and may, if the context so requires, include the assignee of a Claim or a trustee, fiduciary, interim receiver, receiver or other Person acting on behalf of such Person.
- (i) **“Fees and Costs of the Matter”** means the fees, expenses and disbursements of the Professionals in connection with the progress of the Receiver’s file and approved by the Court.
- (j) **“IPO”** means the fundraising which lead to the issuance of the PlexCoins, as described in the White Paper.
- (k) **“Known Creditor”** means a Creditor whose Claim is known to the Receiver on the date of this Order, including persons who have expressed an interest in the

PlexCoin project as part of the IPO based on the information gathered by the Receiver with the AMF or the SEC.

- (l) “**Lacroix**” means Dominic Lacroix.
- (m) “**Notice of Claims Procedure**” means a notice based on a document substantially in accordance with **Schedule D** attached.
- (n) “**Notice of Revision or Disallowance**” means the notice referred to in subparagraph [16](a) hereof, advising a Creditor that the Receiver has revised or disallowed all or part of such Creditor’s Claim set out in its Proof of Claim, and setting out the reasons for such revision or disallowance, and being substantially in the form of **Schedule A** hereto.
- (o) “**Person**” means any individual, company, corporation, limited or unlimited liability company, general or limited partnership, association, trust, trustee, unincorporated organization, joint venture, governmental agency, governmental body or any other entity.
- (p) “**PlexCoin**” means the cryptocurrency called PlexCoin, as described in the White Paper.
- (q) “**PlexCorps**” refers to the project or group of individuals who have contributed to the creation, marketing and issuance of PlexCoins, as described in the White Paper.
- (r) “**Professionals**” collectively means the attorneys for the Receiver, the Receiver and any other professional engaged by the Receiver.
- (s) “**Proof of Claim**” means the proof of claim form substantially in accordance with the attached **Schedule C**.
- (t) “**Related Person**” means a related person within the meaning of section 4 of the *Bankruptcy and Insolvency Act* (Canada).
- (u) “**SEC**” means the United States Securities and Exchange Commission.
- (v) “**White Paper**” means version 2.71 dated August 2017 of the PlexCoin White Paper.

Notification procedure

- [9] **ORDERS** the Receiver to publish this Order and the Notice of Claims Procedure on its website at <https://www.raymondchabot.com/en/companies/public-records/dominic-lacroix/> within two Business Days of this Order.
- [10] **ORDERS** the Receiver to publish the Notice of Claims Procedure within two Business Days of this Order in the *Montreal Gazette*, on the web sites www.coinmarketcap.com and www.coindesk.com, as well as on the subreddit relating to PlexCoin at www.reddit.com/r/plexcoin/.

- [11] **ORDERS** that the Receiver sends within two Business Days of this Order the Notice of Claims Procedure to Known Creditors by the following means:
- (a) for Persons who have expressed an interest in the PlexCoin project as part of the IPO according to the information gathered by the Receiver with the AMF or the SEC, by email according to the email addresses provided by these persons and as retrieved by the AMF or the SEC; and
 - (b) for other Persons, by email or regular mail.
- [12] **ORDERS** that the AMF Press Release be published on the AMF's website within two Business Days of this Order and **ACKNOWLEDGES** the SEC's commitment to publish this Order and the Notice of Claims Procedure on its website.
- [13] **DECLARES** that the notification procedures provided for in this Order are sufficient and are the only ones which must be completed by the Receiver, the AMF and, by their commitment, the SEC, with respect to the Notice of Claims Procedure, the AMF Press Release and this Order.

Filing of Claims

- [14] **DECLARES** and **ORDERS** that, unless authorized by the Court, a Creditor who has not filed his Proof of Claim with the Receiver by the Claims Bar Date or who, with respect to a Claim, has received a notice of disallowance that has not been the subject of an appeal: (i) shall not be entitled to any further notice, (ii) shall be forever barred from pursuing a Claim against the Receiver, (iii) shall not be entitled to receive a distribution under any distribution plan approved by the Court in these proceedings, and (iv) all such Claims shall be forever inadmissible.
- [15] **DECLARES** and **ORDERS** that any Proof of Claim may only be filed with the Receiver by completing and filing the online claim form at the address <https://www.raymondchabot.com/en/companies/public-records/dominic-lacroix/>, and uploading any supporting evidence. Any Proof of Claim received by mail, courier, fax or email will thus not be validly filed with the Receiver, unless there is a specific agreement between a Creditor and the Receiver.

Procedure for the review of a Proof of Claim

- [16] **ORDERS** that the following procedure shall apply where a Creditor files a Proof of Claim before the Claims Bar Date:
- (a) the Receiver will review the Proof of Claim to determine the validity of the Claim it asserts. Where applicable, the Receiver shall send the Creditor a Notice of Revision or Disallowance by mail, fax, courier, email or other means of electronic communication.
 - (b) Prior to sending a Notice of Revision or Disallowance to a Creditor revising or disallowing his or her Claim on the grounds of missing or inappropriate information or supporting evidence, the Receiver shall:

- i. send the Creditor a notice asking for such information or supporting evidence and advising the Creditor that his or her Claim will be revised or disallowed if such information or supporting evidence is not provided to the Receiver within 30 Business Days; and
 - ii. review any additional information or supporting evidence provided by the Creditor within the aforementioned delay in response to the aforementioned notice.
- (c) the Creditor who receives a Notice of Revision or Disallowance and wishes to dispute it shall, within thirty Business Days of the Notice of Revision or Disallowance, file an appeal application with the Court and serve a copy of such appeal application to the Receiver.
- (d) if the Creditor does not file an appeal application within the aforementioned delay, such Creditor shall be deemed to have accepted the value of its Claim as set out in the Notice of Revision or Disallowance.
- (e) Upon receipt of an appeal application within the aforementioned delay, the Receiver will inform the Creditor whether such application will be decided by the Claims Officer or the Court.
- (f) Any decision by the Claims Officer is final and without appeal.
- (g) any appeal from a Notice of Revision or Disallowance proceeds as a true appeal on record and not an appeal *de novo*, unless the Court or the Claims Officer, as the case may be, determines that this is unfair to the Creditor in the circumstances.
- [17] **AUTHORIZES** the Claims Officer to determine any substantive or procedural matter relating to the adjudication of any appeal application submitted to it pursuant to this Order, including the nature, validity or amount of the Claim in question and the terms of the adjudication process.
- [18] **DECLARES** that the fees and expenses of the Claims Officer are paid by the Receiver upon approval of the Tribunal.
- [19] **DECLARES** that the Proofs of Claim are confidential, but **AUTHORIZES** the Receiver to communicate them to any tax or regulatory authority or to any person specifically authorized by the Court.

Notices and communications

- [20] **ORDERS** that any notice or other communication to be given under this Order by a Creditor to the Receiver shall be in writing in substantially the form provided for in this Order and will be validly given only if given by mail, fax, courier or other means of electronic communication addressed to:

Receiver: **Raymond Chabot Administrateur Provisoire Inc.**
Attention: Mr. Emmanuel Phaneuf
Fax: 514-878-2100
Email: phaneuf.emmanuel@rcgt.com

With a copy to:

McCarthy Tétrault LLP

Attention: M^{re} Hugo Babos-Marchand
M^{re} Gabriel Faure
Fax: 514-875-6246
Email: hbmarchand@mccarthy.ca
gfaure@mccarthy.ca
notification@mccarthy.ca

General provisions

- [21] **ORDERS** that the Receiver use its reasonable discretion as to the compliance of any document drafted and signed pursuant to this Order and that if it is satisfied that any matter required to be proved pursuant to this Order is adequately proved, it may waive the requirements set out herein with respect to the drafting and execution of the documents.
- [22] **APPROVES** the contents of the Schedules to this Order and **DECLARES** that they form an integral part hereof.
- [23] **DECLARES** that the Receiver may make an application to the Court for instructions with respect to any matter relating to the execution or modification of his powers and obligations under this Order.
- [24] **DECLARES** that this Order is rendered in both the French and English versions, and that both versions are in force and have the same status.
- [25] **REQUESTS** the aid and recognition of any court or any judicial, regulatory or administrative body in any province or territory of Canada and any judicial, regulatory or administrative Court or other court constituted pursuant to the Parliament of Canada or the legislature of any province or any court or any judicial, regulatory or administrative body of the United States and of any other nation or state to act in aid of and to be complementary to this Court in carrying out the terms of this Order.
- [26] **ORDERS** the provisional execution of this Order notwithstanding appeal, without requiring a security.
- [27] **THE WHOLE**, without legal costs.

DANIEL DUMAIS, J.S.C.

**Schedule A
Notice of Revision or Disallowance**

SUPERIOR COURT
(Commercial Division)

CANADA
PROVINCE OF QUEBEC
DISTRICT OF QUÉBEC
No.: 200-11-025040-182
Office No.: 358421-001

In the matter of the *Act respecting the regulation of the financial sector*, CQLR, c E-6.1 of:

Autorité des marchés financiers
Plaintiff

v.

Dominic Lacroix
Defendant
and

Raymond Chabot Administrateur Provisoire Inc.
Receiver

**NOTICE OF REVISION OR DISALLOWANCE
OF PROOF OF CLAIM OR SECURITY**

To: [Name of creditor]

We have reviewed your Proof of Claim [and any and all subsequent evidence provided by you in connection with that Proof of Claim].

We hereby inform you that we have disallowed your Claim in respect of Dominic Lacroix (or your security in respect of his property) in full [or reviewed your Claim in respect of Dominic Lacroix (or your security in respect of his property) to an amount of \$●] pursuant to the Claims Procedure Order dated ● (the “**Order**”), for the following reason:

●

If you wish to contest this decision, you must file an appeal application with the Superior Court of Québec (Canada) (the “**Court**”) in the above-mentioned matter and serve a copy on the Receiver in accordance with the Order within 30 business days of the date of this notice. If you do not file an appeal application within the time limit set out above, you will be deemed to have accepted the value ascribed to the Claim in this notice. In the event of a contestation, the Receiver may invoke any other ground. To file an appeal application with the Court, you may need or wish to be advised and represented by a lawyer licensed to practice law in Québec (Canada).

Unless otherwise indicated herein, all capitalized terms shall have the meaning given to them in the Order.

Dated at Montreal, this ●.

RAYMOND CHABOT ADMINISTRATEUR PROVISOIRE INC.

Receiver

600 De La Gauchetière Street West, Suite 2000

Montreal, Quebec H3B 4L8

**Schedule B
AMF Press Release**

PlexCoin matter: The Québec Superior Court asks creditors to file a proof of claim in order to participate in a possible distribution

Québec – The Québec Superior Court asks any person holding a claim against Dominic Lacroix to file a proof of claim with Raymond Chabot Administrateur Provisoire Inc., appointed Receiver of Dominic Lacroix, no later than on • [insert Claims Bar Date].

On • 2021, the Honourable Daniel Dumais, Judge of the Québec Superior Court, issued a Claims Procedure Order. Under this order, any person with a claim against Dominic Lacroix must file a proof of claim with the Receiver by completing and filing the online claim form at the address • no later than on • [insert Claims Bar Date]. Any person who is unable to complete the online claim form may contact the Receiver by phone at • to make alternative arrangements for the filing of a proof of claim, which must nevertheless be filed with the Receiver at the latest on • [insert Claims Bar Date]. Any person with a claim against Dominic Lacroix who has not filed a proof of claim with the Receiver within this time period will not be entitled to receive any distribution under any distribution plan approved by the Superior Court.

This decision is in line with the steps taken to proceed to a distribution to creditors of Dominic Lacroix. We note that, on October 29, 2020, the Superior Court declared that amounts seized or frozen in Quebec must be distributed among all of Dominic Lacroix's creditors, while amounts seized or frozen in the United States by the United States Securities and Exchange Commission, if directed to the Receiver for distribution, must be distributed only among PlexCoin investors.

Interested parties may contact the Receiver by email at plexcoin@rcgt.com or visit its website at <https://www.raymondchabot.com/en/companies/public-records/dominic-lacroix/>.

The *Autorité des marchés financiers* is the regulatory and oversight body for Québec's financial sector.

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Information:

Journalists only:

Sylvain Théberge: 514-940-2176

Information Centre:

Quebec: 418-525-0337

Montreal: 514-395-0337

Other regions: 1-877-525-0337

Twitter: @lautorite

LinkedIn: Autorité des marchés financiers (Québec)

Schedule C Proof of Claim

Welcome to Dominic Lacroix's receivership online claims system.

Unless otherwise indicated herein, all capitalized terms shall have the meaning given to them in the Claims Procedure Order dated ●.

This Proof of Claim form must be completed and filed at the latest on ●. A Creditor who has not filed his Proof of Claim with the Receiver on that date shall not be entitled to any further notice, shall be forever barred from pursuing a Claim against the Receiver, shall not be entitled to receive any distribution under any distribution plan approved by the Court in these proceedings, and all such Claims shall be forever inadmissible.

Any person who is unable to complete the online claim form may contact the Receiver by phone at ● to make alternative arrangements for the filing of a proof of claim, which must nevertheless be filed with the Receiver at the latest on ●.

To continue, click the Next button.

CREDITOR DETAILS

Do you file this claim on behalf of anyone other than you, such as a business, a corporation, another entity, a minor child or a person under a protection mandate? [Answers: "yes, I am filing this claim on behalf of another person" or "no, I am filing this claim in my personal capacity."]

Full legal name of the Creditor: ●

[If applicable] Name of Creditor's representative: ●

[If applicable] Title of Creditor's representative: ●

[If applicable] By checking this box, I confirm that I am authorized to file a claim on behalf of the Creditor.

Full mailing address of the Creditor: ●

Residency status for tax purposes: [Answers: "Canadian resident" or "resident of a jurisdiction other than Canada".]

Creditor's telephone number: ●

Creditor's Fax Number: ●

Email address: ●

By checking this box, I authorize the Receiver to contact me at the above email address regarding any questions regarding my Proof of Claim or this matter. Please make sure to add the Receiver's email address to your list of safe senders. This will prevent important emails from the Receiver from being sorted directly into your spam folders.

AMOUNT AND NATURE OF CLAIM

Check and complete the appropriate category.

UNSECURED CLAIM OF CA\$ ●

With respect to this claim, the Creditor has no security on the property of Dominic Lacroix.

SECURED CLAIM OF CA\$ ●

With respect to this claim, the Creditor has a security on the property of Dominic Lacroix, which has an estimated value of CA\$ ●.

CLAIM TYPE

Check the appropriate claim type.

Claim against Dominic Lacroix relating to PlexCoin

Claim against Dominic Lacroix relating to a loan solicited by Dominic Lacroix, Sabrina Paradis-Royer, PlexCorps, DL Innov inc., Micro-Prêts inc. or FinaOne inc.

Other claim against Dominic Lacroix

[If applicable] DETAILS OF THE PLEXCOIN CLAIM

Acquisition of PlexCoins as part of the IPO

Date of acquisition: ●

Quantity of PlexCoins acquired: ●

Type of consideration paid by the Creditor: [Answer: "currency" or "cryptocurrency".]

[If applicable] Currency paid for PlexCoins: ●

[If applicable] Cryptocurrency exchanged for PlexCoins: ●

Amount of currency paid or cryptocurrency exchanged for PlexCoins: ●

[If applicable] Conversion to Canadian dollars: ●

Conversion rate in Canadian dollars: ●

Address of the wallet where the PlexCoins were received: ●

[If applicable] address of the wallet to which the Creditor paid the cryptocurrencies in exchange for the PlexCoins: ●

Please upload any supporting documentation.

Any transfer, assignment, sale or other disposition of PlexCoins must be declared below.

Click the Add button to add another PlexCoin acquisition as part of the IPO to your claim.

Purchase of PlexCoins other than as part of the IPO

Date of acquisition: ●

Quantity of PlexCoins acquired: ●

Type of consideration paid by the Creditor: [Answer: "currency", "cryptocurrency" or "other".]

[If applicable, if the consideration is not a currency or cryptocurrency] specify the consideration paid: ●

[If applicable] Currency paid for PlexCoins: ●

[If applicable] Cryptocurrency exchanged for PlexCoins: ●

Amount of currency paid or cryptocurrency exchanged for PlexCoins: ●

[If applicable] Conversion to Canadian dollars: ●

Conversion rate in Canadian dollars: ●

Address of the wallet where the PlexCoins were received: ●

[If applicable] Address of the Wallet to which the Creditor paid the cryptocurrencies in exchange for the PlexCoins: ●

Please upload any supporting documentation.

Any transfer, assignment, sale or other disposition of PlexCoins must be declared below.

Click the Add button to add another PlexCoin acquisition other than as part of the IPO to your claim.

Bonus in the form of PlexCoins

Quantity of PlexCoin obtained as a bonus: ●.

Date obtained: ●.

Address of the wallet where the PlexCoins were received: ●.

Click the Add button to add another bonus in the form of PlexCoin to your claim.

Transfer, assignment, sale or other disposition of PlexCoins

Date of transfer, assignment, sale or other disposition of PlexCoins: ●

Quantity of PlexCoins transferred, assigned, sold or disposed of: ●

Type of consideration received by the Creditor: [Answer: "currency", "cryptocurrency" or "other".]

[If applicable, if the consideration is not a currency or cryptocurrency] specify the consideration received: ●

[If applicable] currency received against PlexCoins: ●

[If applicable] cryptocurrency exchanged for PlexCoins: ●

Amount of currency received or cryptocurrency exchanged for PlexCoins: ●

[If applicable] Conversion to Canadian dollars: ●

Conversion rate in Canadian dollars: ●

Wallet address to which the Creditor transferred the PlexCoins: ●

[If applicable] Wallet address to which the Creditor received cryptocurrencies in exchange for the PlexCoins: ●

Please upload any supporting documentation.

Any transfer, assignment, sale or other disposition of PlexCoins must be declared.

Click the Add button to add another PlexCoins transfer, assignment, sale or other disposition to your claim.

[If applicable] DETAILS OF CLAIM RELATING TO A LOAN

Borrower: [Answer: "Dominic Lacroix", "Sabrina Paradis-Royer", "PlexCorps", "DL Innov inc.", "Micro-Prêts inc." or "FinaOne inc."]

Loan Date: ●

Loan amount: ●

Interest Rate: ●

[If applicable, if the borrower is Sabrina Paradis-Royer, PlexCorps, DL Innov inc., Micro-Prêts inc. or FinaOne inc.]: Did Dominic Lacroix guarantee the borrower's obligations? [Answer: "yes" or "no"]

[If the answer to the previous question is yes] Please upload a copy of Dominic Lacroix's guarantee.

[If the borrower is Sabrina Paradis-Royer, PlexCorps, DL Innov inc., Micro-Prêts inc. or FinaOne inc. and Dominic Lacroix did not guarantee the borrower's obligations] Please indicate the basis of the Claim against Dominic Lacroix.

Total amount of interest received: ●

Total amount of principal repayments received: ●

Principal amount due: ●

Interest due: ●

Please upload an up-to-date statement of account and any other supporting documentation.

[If applicable] DETAILS OF OTHER CLAIM

Claim against Dominic Lacroix that is not a claim relating to the PlexCoin or a loan solicited by Dominic Lacroix, Sabrina Paradis-Royer, PlexCorps, DL Innov inc., Micro-Prêts inc. or FinaOne inc.

Capital amount: ●

Interest amount: ●

Currency: ●

[If applicable] Conversion to Canadian dollars: ●

[If applicable] Conversion rate in Canadian dollars: ●

Details: ●

Please upload an up-to-date statement of account and any other supporting documentation.

[If applicable] DETAILS OF THE SECURITY

Please describe the security: ●.

Please upload a copy of the security: ●.

SIGNATURE AND DECLARATION

[If the Proof of Claim is completed by the Creditor himself] By checking this box, I, [Name of Creditor], hereby certify that I hold a Claim, that the information I provide is accurate and true and that I am aware of all the circumstances surrounding the Claim contemplated herein.

[If the Proof of Claim is completed by a representative of the Creditor] By checking this box, I, [name of representative of the Creditor], [title of representative of the Creditor], hereby certify that [name of creditor] holds a Claim, that the information I provide is accurate and true and that I am aware of all the circumstances surrounding the Claim contemplated herein.

Click the File button to file your Proof of Claim.

Once your Proof of Claim is filed, you will receive a copy of your Proof of Claim and a confirmation number by email. Please keep this number as it is the number of your Claim with the Receiver.

Schedule D
Notice of Claims Procedure
SUPERIOR COURT
(Commercial Division)

CANADA
PROVINCE OF QUEBEC
DISTRICT OF QUÉBEC
No.: 200-11-025040-182
Office No.: 358421-001

In the matter of the *Act respecting the regulation of the financial sector*, CQLR, c E-6.1 of:

Autorité des marchés financiers

Plaintiff

v.

Dominic Lacroix

Defendant

and

Raymond Chabot Administrateur Provisoire Inc.

Receiver

Notice of Claims Procedure

Notice is hereby given that the Superior Court of Québec has issued a Claims Procedure Order dated ●, pursuant to which the Court ordered the Receiver to notify the potential Creditors in the above matter and to implement a claims procedure.

Any person who believes that he or she has a claim of any nature, present and future, certain or contingent, liquidated or unliquidated, whether it is due now or at a later time, arising out of any obligation incurred by Dominic Lacroix, including without limiting the generality of the foregoing, claims relating to the acquisition of PlexCoin in in the context of the fundraising that led to the issuance of the PlexCoins as well as loans solicited by Dominic Lacroix, Sabrina Paradis-Royer, PlexCorps, DL Innov inc., Micro-Prêts inc. or FinaOne inc. must file a proof of claim with the Receiver by completing and filing the online claim form at the address ● no later than on ● **[insert Claims Bar Date]** (the “**Claims Bar Date**”). Any person who is unable to complete the online claim form may contact the Receiver by phone at ● to make alternative arrangements for the filing of a Proof of Claim, which must nevertheless be filed with the Receiver at the latest on the Claims Bar Date.

A Creditor who has not filed his Proof of Claim with the Receiver before the Claims Bar Date shall not be entitled to any further notice, shall be forever barred from pursuing a Claim against the Receiver, shall not be entitled to receive a distribution under any distribution plan approved by the Court in these proceedings, and all such Claims shall be forever inadmissible.

Unless otherwise indicated herein, all capitalized terms shall have the meaning given to them in the Claims Procedure Order dated ●.

If you would like more information, please do not hesitate to contact the Receiver by email at plexcoin@rcgt.com.

Dated at Montreal, this ●.

RAYMOND CHABOT ADMINISTRATEUR PROVISOIRE INC.

Receiver

600 De La Gauchetière Street West, Suite 2000

Montreal, Quebec H3B 4L8