No. S-197731
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

Between

MICHAEL TIETZ, DUANE LOEWEN, ROBIN LEE, MIKE DOTTO GRANT GREENWOOD MALCOLM RUNKEE, AMERICO MORLANI, GREG LOMNES AND STACY DIONNE

PLAINTIFFS

And

BRIDGEMARK FINANCIAL CORP., JACKSON & COMPANY PROFESSIONAL CORP., ANTHONY JACKSON, LUKOR CAPITAL CORP., JUSTIN EDGAR LIU, ROCKSHORE ADVISORS LTD. (FORMERLY KNOWN AS CAM PADDOCK ENTERPRISES INC.), CAMERON ROBERT PADDOCK, SIMRAN SINGH GILL, JCN CAPITAL CORP., JOHN BEVILACQUA, ESSOS CORPORATE SERVICES INC., SWAY CAPITAL CORP., VON ROWELL TORRES, DETONA CAPITAL CORP., DANILEN VILLANUEVA, NATASHA JON EMAMI, ALTITUDE MARKETING CORP., RYAN PETER VENIER, PLATINUM CAPITAL CORP., 658111 B.C. LTD., JASON CHRISTOPHER SHULL, TRYTON FINANCIAL CORP., ABEIR HADDAD, TAVISTOCK CAPITAL CORP., ROBERT JOHN LAWRENCE, JARMAN CAPITAL INC., SCOTT JASON JARMAN, NORTHWEST MARKETING AND MANAGEMENT INC., RUFIZA ESMAIL, DENISE TRAINOR, ALY BABU MAWJI, ESCHER INVEST SA, HUNTON ADVISORY LTD., RANDY WHITE, KENDL CAPITAL LIMITED, 1153307 B.C. LTD., RUSSELL GRANT VAN SKIVER, BERTHO HOLDINGS LTD., ROBERT WILLIAM BOSWELL, HAIGHT-ASHBURY MEDIA CONSULTANTS LTD., ASHKAN SHAHROKHI, SAIYA CAPITAL CORPORATION, TARA HADDAD, KEIR PAUL MACPHERSON, TOLLSTAM & COMPANY CHARTERED ACCOUNTANTS, ALBERT KENNETH TOLLSTAM, 727 CAPITAL, DAVID RAYMOND DUGGAN, VIRAL STOCKS INC., 10X CAPITAL, CRYPTOBLOC TECHNOLOGIES CORP., NEIL WILLIAM STEVENSON-MOORE, KENNETH CLIFFORD PHILLIPPE, BRIAN BILES, KOOTENAY ZINC CORP., ROBERT TINDALL, AFFINOR GROWERS INC., NICHOLAS BRUSATORE, SAM CHAUDHRY, GREEN 2 BLUE ENERGY CORP., SLAWOMIR SMULEWICZ, MICHAEL YOUNG, GLENN LITTLE, CITATION GROWTH CORP. (FORMERLY KNOWN AS LIHT CANNABIS CORP. AND MARAPHARM VENTURES INC.), DAVID ALEXANDER, YARI ALEXANDER NIEKEN, BLOK TECHNOLOGIES INC., ROBERT DAWSON, JAMES HYLAND, SPEAKEASY CANNABIS CLUB LTD., MARC GEEN, MERVYN GEEN, JEREMY ROSS, ALEXANDER KAULINS, KOPR POINT VENTURES INC. (FORMERLY KNOWN AS NEW POINT EXPLORATION CORP.), BRYN GARDENER-EVANS, INTERNATIONAL CANYON HOLDINGS LTD., JATINDER SINGH BAL, ASAHI CAPITAL CORP., WILSON SU, 1053345 B.C. LTD., ROBERT ABENANTE, ASIATIC MANAGEMENT CONSULTANTS LTD. (NEV.), ASIATIC MANAGEMENT CONSULTANTS LTD. (B.C.), 1140258 B.C. LTD., ARLENE VICTORIA ALEXANDER, 1113300 B.C. LTD., DAVID GREENWAY, 1002349 B.C. LTD., HANSPAUL PANNU, SAMAN ESKARANDI, GRANT FARKES, AMBER PAPOU, AIDA REED, AND ISODORO ALONSO

DEFENDANTS

Brought under the *Class Proceedings Act*, R.S.B.C. 1996, c. 50

ORDER MADE AFTER APPLICATION

BEFORE	THE HONOURABLE MADAM JUSTICE WILKINSON		02/JUL/2024

ON THE APPLICATION of the Plaintiffs dated December 16, 2022, coming on for hearing at Vancouver, British Columbia, on 06/DEC/2023 to 08/DEC/2023, and on hearing counsel and the parties listed on Schedule "A" to this Order, and no one appearing for the remaining Defendants,

THIS COURT ORDERS that:

1. This action is certified as a class proceeding against the Defendants, BLOK Technologies Inc. ("BLOK"), Cryptobloc Technologies Corp. ("Cryptobloc"), Green 2 Blue Energy Corp. ("Green 2 Blue"), Citation Growth Inc., formerly known as Marapharm Ventures Inc. ("Marapharm"), KOPR Point Ventures Inc., formerly known as New Point Exploration Corp. ("New Point") David Alexander, Brian Biles, Bryn Gardener-Evans, Jamse Hyland, Glenn Little, Kenneth Clifford Phillippe, Slawomir Smulewicz, Neil William Stevenson-Moore, Michael Young, 1053345 B.C. Ltd., 10X Capital, 1140258 B.C. Ltd., 1153307 B.C. Ltd., 727 Capital, Asahi Capital Corp., Bertho Holdings Ltd., Detona Capital Corp., Natasha Jon Emami, Escher Invest SA, Saman Eskarandi, Essos Corporate Services Inc., Simran Singh Gill, Haight-Ashbury Media Consultants Ltd., Hunton Advisory Ltd., International Canyon Holding Ltd., Jarman Capital Inc., JCN Capital Corp., Kendl Capital Limited, Keir Paul Macpherson, Northwest Marketing and Management Inc., Cameron Robert Paddock, Rockshore Advisors Ltd., Sway Capital Corp., Tavistock Capital Corp., Danilen Villanueva, Viral Stocks Inc. Robert Abenante, Arlene Victoria Alexander, Jatinder Singh Bal, John Bevilacqua, Robert William Boswell, David Raymond Duggan, Scott Jason Jarman, Robert John Lawrence, Ali Babu Mawji, Ashkan Shahrokhi, Wilson Su, Von Rowell Torres, Denise Trainor, Russell Grant Van Skiver, and Randy White.

2. The Class is comprised of all persons, other than the Defendants and any other Excluded Persons, as that term is defined below, wherever they may reside or be domiciled, who acquired securities in the following companies (collectively, the "Issuers") in the following periods (collectively, the "Class Periods"):

a. in the Defendant Kootenay Zinc Corp. between January 30, 2018 and November 26, 2018;

b. in Affinor Growers Inc. between March 5, 2018 and November 26, 2018;

c. in the Defendant Green 2 Blue between April 12, 2018 and November 26, 2018;

d. in Beleave Inc. between April 24, 2018 and November 26, 2018;

e. in the Defendant Marapharm between May 17, 2018 and November 26, 2018;

f. in the Defendant Cryptobloc between May 18, 2018 and November 26, 2018;

g. in the Defendant BLOK between June 1, 2018 and November 26, 2018;

h. in PreveCeutical Medical Inc. between April 9, 2018 and November 26, 2018; and,

i. in the Defendant New Point between July 25, 2018 and November 26, 2018.

3. In addition to the Defendants, the following persons are excluded from the Class (the "Excluded Persons"):

a. any other persons or entities who entered into consulting agreements with any of the Issuers in the respective Class Periods (the "Unnamed Consultants");

b. the past and present subsidiaries, affiliates, officers, directors, senior employees, partners, legal representatives, heirs, predecessors, successors and assigns of the Defendants or any Unnamed Consultants;

c. any family members of any of the individual Defendants, or of any individual person who otherwise falls within (a) or (b) above;

d. any entities which are controlled by, or are under common control with, an individual defendant, or any family member of either an individual defendant or any individual person who falls within (a) and (b) above; and

e. persons who sold, prior to November 26, 2018, all of the Issuers' securities they purchased during the applicable Class Period.

4. The Class is subdivided into the following two sub-classes:

a. all Class members who purchased their securities in the Issuers through a Canadian stock exchange (the "CSE Sub-Class"); and

b. all Class members who purchased their securities in the Issuers through a non-Canadian stock exchange (the "Foreign Sub-Class").

5. The Plaintiffs, Michael Tietz, Duane Loewen, Robin Lee, Mike Dotto, Grant Greenwood, Malcolm Runkee, Americo Morlani, Greg Lomnes, and Stacy Dionne are appointed as the representative Plaintiffs of the Foreign Sub-Class, and all of those Plaintiffs, except for the Plaintiff Robin Lee, are also appointed as representative Plaintiffs for the CSE Sub-Class.

6. Bennett Mounteer LLP and CFM Lawyers LLP are appointed as Class Counsel.

7. The nature of the claims asserted on behalf of the Class are (i) unlawful conspiracy to defraud the market through deceptive private placements, contrary to s. 380 of the *Criminal Code*, RSC 1985 c. C-46, and s. 57 of the *Securities Act*, RSBC 1996 c. 48, and (ii) fraudulent and negligent misrepresentation; and for the CSE Sub-Class only, (iii) secondary market liability under s. 140.3 of the *Securities Act*.

8. The relief sought on behalf of the Class is set out in the Further Amended Notice of Civil Claim filed February 10, 2023, at paragraphs 302-307.

9. The common issues to be determined in this class proceeding are set out in Schedule "B" to this Order, and all of those common issues are approved for the CSE Sub-Class and common issue 1-9 and 25-30 are approved for the Foreign Sub-Class.

10. Notice of the certification of this action as a class proceeding be given to Class members in the manner set out in Schedule "C" to this Order.

11. Class members may opt out of this class proceeding by giving notice in writing to class counsel that they do not wish to be part of the class proceeding, by mail to Bennett Mounteer LLP, 400-856 Homer Street, Vancouver, B.C., V6B 2W5, attn: BridgeMark Class Action, or by email to info@bridgemarkclassaction.com, within 120 days of this Order.

12. The Litigation Plan attached as Schedule "D" to this Order is approved, the terms of which shall form part of this Order.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT:

Counsel for the Plaintiffs
Paul R. Bennett

Counsel for The Defendants, Tavistock Capital Corp.,
Robert Lawrence, Sway Capital Corp.,
Jason Shull, Platinum Capital Corp., 658111 BC Ltd.,
Robert Boswell, and Bertho Holdings Ltd.
Daniel Yaverbaum

By the Court. Digitally signed by Wilkinson, J

Digitally signed by Jewesson, Chelsea

Registrar

THIS ORDER MADE AFTER APPLICATION was prepared by the law firm of Bennett Mounteer LLP, whose place of business and address for service is #400 – 856 Homer Street, Vancouver, British Columbia, V6B 2W5. Telephone: (604) 639-3680. Fax: (604) 639-3681. Counsel Reference: Paul R. Bennett and Mark W. Mounteer

SCHEDULE "A" – APPEARANCE LIST

	Counsel / Agent	**Party**
1.	Paul R. Bennett pb@hbmlaw.com Nicholas Baker nick@eightyonewest.com Naomi Kovak NKovak@cfmlawyers.ca	The Plaintiffs
2.	Daniel Yaverbaum dyaverbaum@harpergrey.com	The Defendants, Tavistock Capital Corp., Robert Lawrence, Sway Capital Corp., Jason Shull, Platinum Capital Corp., 658111 BC Ltd., Robert Boswell, and Bertho Holdings Ltd.
3.	Kenneth Clifford Phillippe phillippe@telus.net	The Defendant, Kenneth Clifford Phillippe
4.	A. Sood	Agent for the Defendant, Cryptobloc Technologies Corp.
5.	T. Roper	Agent for the Defendant, David Alexander
6.		No one appearing for the remaining Defendants

SCHEDULE "B" -- COMMON ISSUES

In the following common issues, the defined terms "Issuers", "Defendant Issuers", "Issuer Officers and Directors", "Purported Consultants", "Purported Consultant Officers and Directors" and "Private Placements" have the same meaning as in the Further Amended Notice of Civil Claim dated February 23, 2023, except that "Defendant Issuers", "Issuer Officers and Directors" "Purported Consultant Officer and Directors" only includes those Defendants listed in paragraph 1 of the Order made July 2, 2024 of which this Schedule is a part.

Unlawful Conspiracy

1. Did the Purported Consultants and the Issuers, or any of them, conspire to implement and carry out a scheme for the distribution of shares of the Issuers pursuant to the Private Placements that was contrary to s. 380 of the *Criminal Code*, RSC 1985, c. C 46, as amended, and to s. 57 of the *Securities Act*, RSBC 1996, c. 418, as amended?

2. If the answer to (1) is yes, was the unlawful conspiracy directed at the Class members as purchasers of securities of an Issuer subsequent to the Private Placement in that Issuer through which the unlawful conspiracy was carried out?

3. If the answer to (1) is yes, in respect of one or more of the Purported Consultants and Defendant Issuers, did those Purported Consultants and Defendant Issuers know, or ought they to have known, that the unlawful conspiracy would cause loss and damage to the Class members?

4. If the answer to (3) is yes, are those Purported Consultants and Defendant Issuers jointly and severally liable to the Class members for all losses suffered by the Class members as a result of the unlawful conspiracy?

Disgorgement of Unlawful Gain

5. Did the Purported Consultants, or any of them, accrue a benefit from the sale of some or all of the shares they acquired in the Issuers pursuant to the unlawful conspiracy, either as a subscriber in one of the Private Placements or as a recipient of shares transferred to them from such a subscriber?

6. If the answer to (5) is yes, are the Class members who acquired securities in those Issuers entitled to disgorgement of those accrued benefits, as a remedy for the unlawful conspiracy?

7. If the answer to (6) is yes, what is the amount of the accrued benefit which each of the Purported Consultants must disgorge to the Class members?

Personal Liability

8. Are the Purported Consultant Officers and Directors, or any of them, personally liable for the acts carried out in furtherance of the unlawful conspiracy by the Purported Consultant for which they acted as an officer or director, or both?

9. Are the Issuer Officers and Directors, or any of them, personally liable for the acts carried out in furtherance of the unlawful conspiracy by the Defendant Issuer for which they acted as an officer or director, or both?

Secondary Market Liability

10. Did each of the following news releases by a Defendant Issuer concerning each Private Placement carried out by that Defendant Issuer (collectively, the "Private Placement News Releases") and each of the Form 9s released and filed by the Defendant Issuer concerning that Private Placement (collectively, the "Form 9s"), constitute a "document", within the meaning of s. 140.1 of the *Securities Act*:

<u>Cryptobloc</u>

a. Cryptobloc news release dated May 18, 2018
b. Form 9 filed by Cryptobloc on June 5, 2018
c. Cryptobloc news release dated June 6, 2018

<u>BLOK</u>

d. BLOK news release dated June 1, 2018
e. Form 9 filed by BLOK on June 1, 2018
f. BLOK news release dated June 8, 2018
g. Form 9 dated June 30, 2018 and filed by BLOK on September 26, 2018

<u>New Point</u>

h. New Point news release dated July 25, 2018
i. Form 9 filed by New Point on August 8, 2018; and
j. New Point news release dated August 9, 2018.

11. Did each of the following news releases, concerning the increased trading activity in the shares of the Defendant Issuer who released the news release, constitute a "document" within the meaning of s. 140.1 of the *Securities Act*:

    a. Cryptobloc news release dated June 14, 2018.

    (collectively, the "Trading News Releases").

12. Did each of the Form 9s referred to in (10) above, and did each of the following Material Change Reports:

    a. Cryptobloc Material Change Report filed June 28, 2018; and
    b. New Point Material Change Report filed August 9, 2018;

    (collectively, the "Material Change Reports"),

    constitute a "core document" within the meaning of s. 140.1 of the *Securities Act*, in relation to the Defendant Issuer who filed the Form 9 or Material Change Report, and each of the Issuer Officers and Directors who was an officer of that Issuer when the Form 9 or Material Change Report was filed?

13. Did each of the following Management Discussion and Analysis ("MD&A") or Financial Statements:

    a. BLOK Interim Financial Statements for the 6-months ended June 30, 2018, filed August 29, 2018.

    (collectively, the "MD&As and Financial Statements"),

    constitute a "core document", within the meaning of s. 140.1 of the *Securities Act*, in relation to the Defendant Issuer, and each of the Issuer Officers and Directors who was an officer or director, or both, of that Issuer when that document was released and filed?

14. Did each of the Private Placement News Releases and the Form 9s referred to in (10) contain "misrepresentations", within the meaning of s. 1 of the *Securities Act,* concerning

the Private Placement which was the subject of the Private Placement News Release or the Form 9, by misstating:

a. the price per share at which the shares were purchased under the Private Placement; and

b. the gross proceeds received by the Defendant Issuer under the Private Placement and the amount of the capital available to the Defendant Issuer from those proceeds;

and by omitting to state that:

c. the Purported Consultants who acquired shares under the Private Placements, and certain other Purported Consultants, had entered into consulting agreements with the Issuers, at or around the same time as the Private Placement, as a condition of the participation in the Private Placement by the Purported Consultants who were acquiring shares under the Private Placement; and

d. most of the proceeds of the Private Placement were paid to the Purported Consultants who entered into the consulting agreements, as lump sum fees under the agreements, at or around the same time as the Private Placement?

15. If the answer to (14) is yes, did each of the Material Change Reports referred to in (12) above, and did each of the MD&As and Financial Statements referred to in (13), contain the same "misrepresentations", within the meaning of s. 1 of the *Securities Act*, concerning the Private Placement of the Issuer which was the subject of the Private Placement News Releases and the Form 9s released and filed by that Issuer, referred to in (10) above?

16. Did each of the Trading News Releases referred to in (11) contain a "misrepresentation", within the meaning of s. 1 of the *Securities Act*, concerning the increased trading activity of the Issuer which released the News Release?

17. If the answer to (14), (15), and/or (16) is yes with respect to any one or more of the documents referred to therein, were the misrepresentations in these documents publicly corrected by the News Release and by the Temporary Order issued by the B.C. Securities Commission on November 26, 2018?

18. If the answer to (14), (15), and/or (16) is yes with respect to any one or more of the documents referred to therein, did each Issuer Officer and Director who acted as an officer or director of the Defendant Issuer when the document which contained the misrepresentation was released or filed by that Defendant Issuer, authorize, permit or acquiesce in the release or filing of that document by that Defendant Issuer?

19. If the answer to (18) is yes for any one or more of the Issuer Officers and Directors, did those Issuer Officers and Directors know, when the documents were released or filed by the Defendant Issuer for which they then acted as an officer or director, that the documents contained misrepresentations?

20. If the answer to (19) is no for any one or more of the Issuer Officers and Directors in respect of one or more documents containing a misrepresentation released or filed by the Defendant Issuer for which they then acted as an officer and director, which was not a core document, did each of those Issuer Officers and Directors avoid acquiring knowledge, before the document was released or filed by the Defendant Issuer, that it contained a misrepresentation or were any of those Issuer Officers and Directors guilty of gross misconduct in the release or filing of that document?

21. If the answer to (19) is no for any one of the Issuer Officers and Directors in respect of a core document containing a misrepresentation released or filed by the Defendant Issuer for which they then acted as an officer and director, did each of those Issuer Officers and Directors either:

    a. fail to conduct or cause to be conducted a reasonable investigation before the release or filing of the core document; or

    b. have reasonable grounds to believe that the core document contained the misrepresentation, at the time the core document was released or filed

    and if the core document was released but not filed, know or have reasonable grounds to believe the document would be released?

22. If the answer to (19) is yes for one or more of the Issuer Officers and Directors, are the Class members who acquired shares in the Defendant Issuers, for which those Issuer

Officers and Directors acted as an officer and director, entitled to damages against these Issuer Officers and Directors calculated pursuant to s. 140.5 of the *Securities Act,* without application of the limits on damages provided by s. 140.7 of the *Securities Act,* and may the whole amount of the damages assessed be recovered from one or more of the Issuer Officers and Directors pursuant to s. 140.6(2) of the *Securities Act*?

23. If the answer to (19) is no in respect of any one or more of the Issuer Officers and Directors, and the answer to either (20) or (21) is yes in respect of one or more of those same Issuer Officers and Directors, are the Class members who purchased shares from the Defendant Issuers, for which those Issuer Officers and Directors acted as an officer and director, entitled to damages against those Issuer Officers and Directors calculated in accordance with s. 140.5 of the *Securities Act* and if so:

    a. what is the proportionate liability of each such Issuer Officer and Director pursuant to s. 140.6 of the *Securities Act* for those damages? and

    b. are those damages subject to the limits on damages set out in s. 140.7 of the *Securities Act* and if so, what is the amount of those limits?

24. If the answer to (14), (15), and/or (16) is yes in respect of any one or more of the documents listed, and in light of the answers to (18) to (21), are the Class members entitled to damages against the Issuer which filed or released the documents in respect of the shares the Class members purchased in that Issuer, calculated pursuant to s. 140.5 of the *Securities Act*, and if so:

    a. is each Issuer liable to the Class members who purchased shares in the Issuer for all of the damages so calculated or only the Issuer's proportionate share of those damages, pursuant to s. 140.6 of the *Securities Act*?; and

    b. are those damages subject to the limits on damages set out in s. 140.7 of the *Securities Act* and if so, what is the amount of those limits?

Fraudulent or Negligent Misrepresentation

25. If the answer to (14) is yes in respect to any one or more of the Private Placement News Releases and Form 9s, did those same "misrepresentations" in those documents, within the

meaning of s. 1 of the *Securities Act*, also constitute material misrepresentations at common law for the purpose of the torts of fraudulent or negligent misrepresentations?

26. If the answer to (25) is yes in respect to one or more of the misrepresentations in the Private Placement News Releases and the Form 9s, did the Defendant Issuers who released or filed those documents containing the misrepresentations, and did any of the Issuer Officers and Directors who authorized, permitted or acquiesced in the filing of those documents, as determined by the answer to (18) above, do so knowing that the misrepresentations in the documents were false or with reckless disregard as to whether the misrepresentations were true?

27. If the answer to (26) is yes in respect to one or more of the Defendant Issuers or the Issuer Officers and Directors, did the Defendant Issuers release or file those documents, and did the Issuer Officers and Directors who authorized, permitted or acquiesced in the release or filing of those documents do so, with the intention that Class members would rely on the misrepresentations in those documents in determining whether to purchase shares of the Issuer and to induce the Class members to purchase those shares?

28. If the answer to (26) is no in respect of one or more of the Defendant Issuers or the Issuer Officers and Directors, did those Defendant Issuers which filed or released those documents, and those Issuer Officers and Directors who authorized, permitted or acquiesced in the release or filing of those documents, owe a duty of care to Class members to ensure that the information set out in the documents did not contain a misrepresentation concerning the Private Placement which was the subject of those documents?

29. If the answer to (28) is yes for one or more of those Defendant Issuers or Issuer Officers and Directors, did those Defendant Issuers or Issuer Officers and Directors breach that duty of care?

30. If the answer to (29) is yes in respect to one or more of the Defendant Issuers or the Issuer Officers and Directors, would the misrepresentations made in the documents released or filed by those Issuers, or made in the documents the release or filing of which was authorized, permitted or acquiesced in by those Issuer Officers and Directors, have occurred if that duty of care had not been breached?

SCHEDULE "C" – CERTIFICATION NOTICE PLAN

1. Class Counsel shall post and regularly update information about the nature and status of the action on a dedicated website: www.bridgemarkclassaction.com (the "Website"). The Website will include accessible copies of important publicly available court documents, court decisions, notices, documentation and other information relating to the action.

2. The Plaintiffs will disseminate notice of the certification of the class action substantially in the form and content set out below (the "Notice").

3. No later than 15 business days after the Order authorizing the Notice, the Notice will be distributed and published as follows:

    a. posted by Class Counsel on the Website;

    b. provided by Class Counsel to any Class Member who has contacted Class Counsel or to any person who requests the notice; and

    c. disseminated once across Canada NewsWire (distribution points in North American financial media, where possible).

4. For purposes of disseminating the Notice, the Defendant Issuers will each, not later than 21 days after the Order authorizing the Notice, deliver to Class Counsel such lists as contain the names and mailing addresses of the non-objecting beneficial owners of their shares ("NOBO Lists") that were used for their 2018 and 2019 Annual General Meetings ("AGM"). In the event an AGM was not held in 2018 or 2019, the Defendant Issuers will deliver to Class Counsel such alternative lists as may be satisfactory to them.

5. Within 30 days of receiving the NOBO Lists from an Issuer, Class Counsel shall send the Notice by mail to the addresses of the non-objecting beneficial owners on the NOBO Lists.

6. The cost of mailing the Notice to the non-objecting beneficial owners on the NOBO Lists for each Issuer shall be paid by that Issuer, and each Purported Consultant who participated in the Private Placement of that Issuer, either as a subscriber or consultant, on equal pro-rata basis.

NOTICE

BRIDGEMARK SECURITIES LITIGATION

NOTICE OF CERTIFICATION

Read this notice carefully, it may affect your legal rights.

This notice is for **anyone who purchased securities** in any of the following companies within the listed dates:

a. in **Affinor Growers Inc.** between March 5, 2018 and November 26, 2018;
b. in **BLOK Technologies Inc.** between June 1, 2018 and November 26, 2018;
c. in **Beleave Inc.** between April 24, 2018 and November 26, 2018;
d. in **Marapharm Ventures Inc.** (later known as Liht cannabis Corp., then Citation Growth Corp., and then Fiore Cannabis Ltd.) between May 17, 2018 and November 26, 2018;
e. in **Cryptobloc Technologies Corp.** (later known as Global Elsimate Capital Corp., then as Extreme Vehicle Battery Technologies and, later, as Cryptoblox Technologies Inc.) between May 18, 2018 and November 26, 2018;
f. in **Green 2 Blue Energy Corp** (later known as G2 Technologies Corp., and then as G2 Energy Corp.) between April 12, 2018 and November 26, 2018;
g. in **Kootenay Zinc Corp.** (later known as Peakbirch Logic Inc. and, then, as Peakbirch Commerce Inc.) between January 30, 2018 and November 26, 2018;
h. in **New Point Exploration Corp.** (later known as KOPR Point Ventures Inc., then Bam Bam Resources Ltd. and, later, as Majuba Hill Copper Corp.) between July 25, 2018 and November 26, 2018; or,
i. in **PreveCeutical Medical Inc.** between April 9, 2018 and November 26, 2018.

On [DATE], the B.C. Supreme Court certified a class action in *Tietz & Loewen v. BridgeMark Financial Corp. et al*, S.C.B.C. No. S 197731.

The Court appointed Michael Tietz, Duane Loewen, Robin Lee, Mike Dotto, Malcolm Runkee, Americo Morlani, Greg Lomnes, Grant Greenwood, and Stacy Dionne as representatives for the class. The class includes anyone who purchased shares in the above companies within the listed dates, except for (i) the Defendants, (ii) anyone who entered into consulting agreements with the above companies during the listed time periods, and (iii) certain people related to or affiliated with the Defendants.

The Defendants are: BridgeMark Financial Corp., Jackson & Company Professional Corp., Anthony Jackson, Lukor Capital Corp., Justin Edgar Liu, Rockshore Advisors Ltd. (formerly known as Cam Paddock Enterprises Inc.), Cameron Robert Paddock, Simran Singh Gill, JCN Capital Corp., John Bevilacqua, Essos Corporate Services Inc., Sway Capital Corp., Von Rowell

Torres, Detona Capital Corp., Danilen Villanueva, Natasha Jon Emami, Altitude Marketing Corp., Ryan Peter Venier, Platinum Capital Corp., 658111 B.C. Ltd., Jason Christopher Shull, Tryton Financial Corp., Abeir Haddad, Tavistock Capital Corp., Robert John Lawrence, Jarman Capital Inc., Scott Jason Jarman, Northwest Marketing and Management Inc., Rufiza Esmail, Denise Trainor, Aly Babu Mawji, Escher Invest SA, Hunton Advisory Ltd., Randy White, Kendl Capital Limited, 1153307 B.C. Ltd., Russell Grant Van Skiver, Bertho Holdings Ltd., Robert William Boswell, Haight-Ashbury Media Consultants Ltd., Ashkan Shahrokhi, Saiya Capital Corporation, Tara Haddad, Keir Paul Macpherson, Tollstam & Company Chartered Accountants, Albert Kenneth Tollstam, 727 Capital, David Raymond Duggan, Viral Stocks Inc., 10X Capital, Cryptobloc Technologies Corp. (later known as Global Elsimate Capital Corp, then Extreme Vehicle Battery Technologies Corp., then Cryptoblox Technologies Inc.), Neil William Stevenson-Moore, Kenneth Clifford Phillippe, Brian Biles, Kootenay Zinc Corp. (later known as Peakbirch Logic Inc., then Peakbirch Commerce Inc.), Robert Tindall, Affinor Growers Inc., Nicholas Brusatore, Sam Chaudhry, Green 2 Blue Energy Corp. (later known as G2 Technologies Corp., then G2 Energy Corp.), Slawomir Smulewicz, Michael Young, Glenn Little, Marapharm Ventures Inc. (later known as Light Cannabis Corp., then Citation Growth Corp.), David Alexander, BLOK Technologies Inc., Robert Dawson, James Hyland, New Point Exploration Corp. (later known as KOPR Point Ventures, then Bam Bam Resources Ltd., then Majuba Hill Copper Corp.), and Bryn Gardener-Evans.

What is the class action about?

The action arises from private placements carried out between February 2018 and August 2018 in ten different public companies. The action alleges that the private placements were part of a fraudulent investment scheme, in which the companies entered into consulting agreements with the subscribers to the private placements, and their designated associates, as a condition of the subscribers' participation in the private placements. It is alleged that these consulting agreements were a sham, and no consulting services were ever provided.

It is alleged these agreements required the payments of lump sum consulting fees, which were paid by the companies contemporaneously with the closing of the private placements, and provided justification for the companies to issue free trading shares to the subscribers. The action alleges that the subscribers quickly sold most of their shares into the market, or short sold the company's shares and used the private placement allocations to cover the short positions, at prices which were substantially below the price they had purportedly paid to acquire the shares and below the prevailing market prices for the companies' shares at the time. The action alleges that the subscribers earned a substantial profit from the sales of those shares.

The action also alleges that, as part of the scheme, the companies involved made misrepresentations to the market in the disclosure documents they released concerning the private placements. It is alleged that the companies carrying out the private placements represented that the private placements were cash for securities prospectus exempt distributions

under which the companies raised significant financing, when, in fact, the true substance of the private placements left each company with cash proceeds from its private placement that were substantially less than the amount the company represented to the public it had received.

The Defendants dispute the claims asserted against them.

How do I participate?

You are automatically included in the class. You do not have to do anything to participate.

If you do **not** want to be part of the lawsuit, you must notify class counsel in writing at the address below by no later than [DATE], providing your name and address and indicating that you wish to opt out. **You must opt out if you do not want to be bound by the class action.**

What are the financial consequences?

Judgment on the common issues, whether favourable or not, will bind all class members who do not opt out of the proceeding. If the class obtains recovery against the Defendants, then you will be entitled to share in the recovery. If you opt out of the class action, you do not have this right.

If the action is not successful on the common issues, no class member will be responsible for legal fees or costs. The representative plaintiffs have entered into a contingency fee agreement with class counsel for the legal work on the common issues. Class counsel will be paid only if the action is successful. The court will determine the amount to be paid to class counsel for legal fees and disbursements. Class counsel's fee will be a maximum of 35% of the total amounts recovered under any judgments, orders or settlement.

For more information, please visit the class action website at: www.bridgemarkclassaction.com or contact class counsel, Bennett Mounteer LLP and Camp Fiorante Matthews Mogerman LLP, at info@bridgemarkclassaction.com.

This notice has been authorized by the B.C. Supreme Court. Do not contact the court.

SCHEDULE "D" – PROPOSED LITIGATION PLAN

Case Management

1. The certified class proceeding will continue to be case managed to achieve efficiency for the parties and the courts.

2. Case management conferences shall be held every 6 to 8 weeks, or as otherwise directed by the Case Management Judge.

Discovery

3. Within 21 days of the date of the decision certifying this action as a class proceeding (the "Certification Decision"), the Plaintiffs will deliver their initial list of documents and provide copies of those documents to the Defendants in electronic form. This and all other timelines in this litigation plan shall apply irrespective of an appeal by the Defendants from the Certification Decision, unless the Court or Court of Appeal orders otherwise.

4. Within 60 days of the Certification Decision, the Defendants shall deliver their initial list(s) of documents and provide copies of those documents to the Plaintiffs in electronic form.

5. Any additional production shall be made by the parties on an ongoing basis thereafter. For greater certainty and to achieve efficiency, the parties must respond to any demands for additional documents pursuant to Rule 7-1(10) and (11).

6. Within 120 days of the Certification Decision, a schedule for examinations for discoveries shall be set at a Case Management Conference. For greater certainty, examinations for discovery shall not have to await the completion of the document discovery process.

7. Examinations for discovery shall be completed by not less than 100 days before the common issues trial. For greater certainty, any outstanding requests made at the examination(s) for discovery must be answered by not less than 75 days before the trial.

8. Any interrogatories must be served in accordance with Rule 7-3 of the *Supreme Court Civil Rules*.

Expert Reports

9. Any expert reports that the parties intend to rely upon at trial shall be delivered in accordance with the *Supreme Court Civil Rules* unless otherwise ordered by the Court as part of the case management process. For greater certainty and to achieve efficiency, the parties shall exchange lists of proposed experts and general subjects for reports by not later than 6 months before the common issues trial.

Interlocutory Applications

10. Pursuant to s. 14(1) of the *Class Proceedings Act*, the Case Management Judge shall hear all interlocutory applications either at regular case management conferences or on a date for hearing secured at a case management conference or through Trial Division as directed by the Case Management Judge.

11. All materials in support of an interlocutory application shall be delivered and filed in accordance with the *Supreme Court Civil Rules* unless otherwise directed by the Case Management Judge.

Common Issues Trial

12. The common issues trial will proceed on a date between 18 and 24 months from the Certification Decision, which date and the length of time for the trial shall be set at a Case Management conference held within 120 days of the Certification Decision.

Individual Issues Determination and Claims Process

13. If the Defendants are wholly successful on the common issues, the case will be at an end and no individual issues will remain to be determined.

14. The Plaintiffs propose that if any or all of the common issues are resolved in favour of the Class, then the parties convene for argument under ss. 27 and 28 of the *Class Proceedings Act* to determine the appropriate course for resolving any remaining issues. At this time, the Plaintiffs intend to propose the following procedure:

    a. After determination of the common issues, the parties and the court will consider whether there are any issues remaining that may be determined as secondary common issues.

    b. The Court shall appoint an assessor to determine any individual issues of liability that may remain after the common issues trial and assess the damages to which each claiming class member is entitled.

    c. The claims process and the inquiry by the assessor shall be carried out in accordance with rules of procedure and proof as agreed by the parties or determined by the Court.

    d. The specific protocol, for submitting, proving and reviewing claims, will depend on the nature of the individual issues remaining, if any, and be subject to the approval of the Court. As far as is practicable, the procedure should be electronic, use standardized claim forms and rely primarily, or entirely, on documentary evidence, such as trading account statements or trade confirmation slips which confirm the acquisition of securities in one of the Issuers during the relevant time period.

e. The claims protocol will include a deadline by which Class members must file their claims and anyone who does not file a claim before the deadline will not be entitled to recover any damages without leave of the Court.

f. The assessor shall issue a report to the Court for each claim made and 30 days after the report is filed, the Court shall order that the claim be determined as set out in the assessor's report unless another party files a challenge in accordance with the procedure as agreed by the parties or determined by the Court.

g. If challenges are made by any party to the assessor's reports, the Court shall hold one or more hearings to determine the challenges made and for each challenge made, shall either dismiss the challenge, revise the assessment made by the assessor, or direct that further inquiry and assessment be made.

15. The litigation plan may be amended from time to time by directions given at case management conferences or as otherwise ordered by the Court.

No. S-197731
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

MICHAEL TIETZ ET AL.

PLAINTIFFS

AND:

BRIDGEMARK FINANCIAL CORP. ET AL.

DEFENDANTS

ORDER MADE AFTER APPLICATION

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