

IN THE MATTER OF

Emerge Canada Inc. and Lisa Langley

File No.: 2025-7

ONTARIO SECURITIES COMMISSION
CAPITAL MARKETS TRIBUNAL

NOTICE OF MOTION (Rule 29.2 – Motion in Writing)

The Respondents, EmERGE Canada Inc. and Lisa Langley, will make a motion to the Ontario Securities Commission (the “Tribunal”) under Rule 29.2 of the Rules of Procedure and Forms. The motion is to be heard in writing, unless otherwise directed by the Tribunal.

RELIEF SOUGHT

1. An order extending the deadline of October 31, 2025, for the Respondents to file and serve witness lists, witness summaries, and expert information to December 8, 2025;
2. An order adjourning the Case Management Conference currently scheduled for November 10, 2025, to a date after December 15, 2025; and
3. Such further and other relief as the Tribunal may deem just.

GROUNDINGS FOR THE MOTION

1. The Respondents are in the process of retaining counsel to assist with this proceeding and require adequate time to prepare their defense;
2. The Respondents have been diligently reviewing approximately 18,000 documents disclosed by Staff, but require more time to complete this review and to identify and prepare witnesses and experts;
3. Ms. Langley is scheduled to attend a pre-existing civil proceeding in Los Angeles on November 10, 2025, and a contractual arbitration hearing on November 18, 2025, which together create unavoidable scheduling conflicts;
4. The Respondents are currently receiving limited assistance under the OSC Litigant Assistance Program, which does not extend to comprehensive document review or witness preparation;
5. The Respondents have acted in good faith, promptly requested extensions from the Registrar and Staff on October 29 and 30, 2025, but have not received direction;
6. The requested extension and adjournment are sought in the interests of justice and fairness and will not prejudice any party.

THE FOLLOWING DOCUMENTARY EVIDENCE WILL BE RELIED UPON

1. The Affidavit of Lisa Langley, sworn October 31, 2025, and the exhibits attached thereto; and
2. Such further and other materials as counsel may advise and the Tribunal may permit.

Dated at Toronto, Ontario, this 31st day of October, 2025.

Respectfully submitted,

Lisa Langley

On behalf of Emerge Canada Inc. and Lisa Langley

Email: llangley@emergecm.com

CERTIFICATE OF SERVICE

TO: Registrar, Capital Markets Tribunal (registrar@capitalmarketstribunal.ca)

AND TO: Khrystina McMillan, OSC Staff Counsel (kmcmillan@osc.gov.on.ca)

AND TO: All other parties as per the attached service list.