Court File No. CI 11-01-72347

THE QUEEN'S BENCH
Winnipeg Centre

IN THE MATTER OF THE APPOINTMENT OF A RECEIVER PURSUANT TO SECTION 243 OF THE *BANKRUPTCY AND INSOLVENCY ACT* R.S.C. 1985 c.B-3 AS AMENDED

BETWEEN:
GE Canada Finance Holding Company
(the "Applicant")

and

Paramount Truck Lines Ltd.
(the "Respondent")

ERNST & YOUNG INC.
Receiver of the Respondents

SUPPLEMENT TO FOURTH REPORT OF THE RECEIVER

JANUARY 30, 2012

INTRODUCTION

1. On June 1, 2011 this Honourable Court granted an order (the "Receivership Order") appointing Ernst & Young Inc. as receiver ("E&Y" or the "Receiver") of certain assets, property and undertaking of Paramount Truck Lines Ltd. ("Paramount") pursuant to section 243 of the *Bankruptcy and Insolvency Act*, R.S.C. 1985 c.B-3, as amended (the "BIA").

2. E&Y filed its fourth report dated January 24, 2012 (the "Fourth Report") which provided an update on claims of Canada Revenue Agency ("CRA") for unpaid source deduction remittances and a proposed interim distribution.

3. The purpose of this supplement to the Fourth Report is to provide additional information to this Honourable Court of the components of the amounts proposed to be allocated to secured creditors as described in paragraph 31 of the Fourth Report.

4. In preparing this Fourth Report, the Receiver has relied upon unaudited financial information, books and records of the Company, financial information prepared by the Company and discussions with management of the Company and the Applicant. The Receiver has not audited, reviewed, or otherwise attempted to verify the accuracy or completeness of the information and, accordingly, the Receiver expresses no opinion or other form of assurance on the information contained in this supplement to the Fourth Report.

5. Unless otherwise stated, all monetary amounts contained herein are expressed in Canadian dollars.

6. Capitalized terms not defined in this report are as defined in the Fourth Report.

COMPONENTS OF AMOUNTS ALLOCATED TO SECURED CREDITORS

7. Paragraph 30 of the Fourth Report indicates that legal counsel for the Applicant wrote to counsel for each of Daimler, Beaver, CIT, and Stoughton, with a copy to the

Receiver, proposing a settlement and allocation of the Revised Deemed Trust Claim. The proposal included a proposed allocation of the Revised Deemed Trust Claim and the costs of a bankruptcy proceeding, along with a return of surplus amounts that had been previously paid to the Receiver by Daimler, Beaver, CIT, and Stoughton.

8. The proposed allocation described in paragraph 31 of the Fourth Report is comprised of the following components:

(a) Daimler – proposed allocation of $28,299.72, comprised of a pro-rata allocation of $27,426.82 in respect of the Revised Deemed Trust Claim, and $872.90 in respect of the anticipated fees and disbursements of the trustee in bankruptcy;

(b) Beaver – proposed allocation of $13,691.22, comprised of a pro-rata allocation of $13,268.92 in respect of the Revised Deemed Trust Claim, and $422.30 in respect of the anticipated fees and disbursements of the trustee in bankruptcy;

(c) CIT – proposed allocation of $26,397.22, comprised of a pro-rata allocation of $25,583.00 in respect of the Revised Deemed Trust Claim, and $814.21 in respect of the anticipated fees and disbursements of the trustee in bankruptcy;

(d) Stoughton – proposed allocation of $29,760.57, comprised of a pro-rata allocation of $28,842.61 in respect of the Revised Deemed Trust Claim, and $917.95 in respect of the anticipated fees and disbursements of the trustee in bankruptcy;

(e) GE Equipment – proposed allocation of $123,934.42, comprised of a pro-rata allocation of $120,111.71 in respect of the Revised Deemed Trust Claim, and $3,822.71 in respect of the anticipated fees and disbursements of the trustee in bankruptcy; and

(f) The Applicant – proposed allocation of $102,122.37, comprised of a pro-rata allocation of $98,972.44 in respect of the Revised Deemed Trust Claim, and $3,149.93 in respect of the anticipated fees and disbursements of the trustee in bankruptcy.

9. In aggregate, the amounts in the preceding paragraph comprising the Revised Deemed Trust Claim total $314,205.50, and the amounts comprising the anticipated fees and disbursements of the trustee in bankruptcy total $10,000.00.

All of which is respectfully submitted this 30th day of January, 2012.

ERNST & YOUNG INC.
In its capacity as Receiver of Paramount Truck Lines Ltd.

Per: Joe Healey

Joe Healey, CA, CIRP
Senior Vice President