

Cause No: M/M/114-12

IN THE COURT OF QUEEN'S BENCH
OF NEW BRUNSWICK

TRIAL DIVISION

JUDICIAL DISTRICT OF MONCTON

BETWEEN:

**IN THE MATTER OF THE
COMPANIES' CREDITORS
ARRANGEMENT ACT, R.S.C. 1985, c.
C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN
OF COMPROMISE OR
ARRANGEMENT OF LANDDRILL
INTERNATIONAL INC.
(A BRITISH COLUMBIA
CORPORATION), LANDDRILL
INTERNATIONAL LTD.
(A NEW BRUNSWICK
CORPORATION), LANDDRILL
ATLANTIC LTD.
(A NEW BRUNSWICK
CORPORATION), LANDDRILL
CONTRACT MINING LTD.
(A NEW BRUNSWICK
CORPORATION),
LANDDRILL INTERNATIONAL
MEXICO S.A. DE C.V.
(A MEXICAN CORPORATION),
LANDDRILL INTERNATIONAL LLC
(A MONGOLIAN CORPORATION)
and LANDDRILL INTERNATIONAL
INC. (A BARBADOS
CORPORATION)**

MOTION RECORD

COUR DU BANC DE LA REINE DU
NOUVEAU-BRUNSWICK

DIVISION DE PREMIERE INSTANCE
CIRCONSCRIPTION JUDICIAIRE DE

ENTRE:

DOSSIER

STIKEMAN ELLIOTT LLP
Barristers and Solicitors
5300 Commerce Court West
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TAB 1

Cause No: M/M/114-12

IN THE COURT OF QUEEN'S BENCH OF
NEW BRUNSWICK

TRIAL DIVISION

JUDICIAL DISTRICT OF MONCTON

BETWEEN:

**IN THE MATTER OF THE COMPANIES'
CREDITORS ARRANGEMENT ACT, R.S.C.
1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF
COMPROMISE OR
ARRANGEMENT OF LANDDRILL
INTERNATIONAL INC.
(A BRITISH COLUMBIA
CORPORATION), LANDDRILL
INTERNATIONAL LTD.
(A NEW BRUNSWICK CORPORATION),
LANDDRILL ATLANTIC LTD.
(A NEW BRUNSWICK CORPORATION),
LANDDRILL CONTRACT MINING LTD.
(A NEW BRUNSWICK CORPORATION),
LANDDRILL INTERNATIONAL MEXICO
S.A. DE C.V.
(A MEXICAN CORPORATION),
LANDDRILL INTERNATIONAL LLC (A
MONGOLIAN CORPORATION) and
LANDDRILL INTERNATIONAL INC. (A
BARBADOS CORPORATION)**

COUR DU BANC DE LA REINE DU
NOUVEAU-BRUNSWICK

DIVISION DE PREMIERE INSTANCE
CIRCONSCRIPTION JUDICIAIRE DE

ENTRE:

**NOTICE OF MOTION
(FORM 37A)**

**AVIS DE MOTION
(Formule 37A)**

TO: All Parties on the Service List
attached as Schedule "A".

DESTINAIRE:

Ernst & Young Inc. (the "Monitor"), as
Monitor under the *Companies' Creditors
Arrangement Act*, R.S.C. 1985, c. C-36, as
amended (the "CCAA") of Landdrill
International Inc., Landdrill International
Ltd., Landdrill Atlantic Ltd., Landdrill
Contract Mining Ltd., Landdrill Mexico S.A.

de C.V., Landdrill International LLC, and Landdrill International Inc. (collectively, the "Applicants") will make a motion to the Court on the 15th day of February 2013 at 1:00 p.m. or as soon after that time as a motion can be heard, at the Moncton Court House, 145 Assumption Blvd., Moncton, New Brunswick, for an Order:

Le _____ demandera à la Cour à

Le _____, 20____, à _____ h,
d'ordonner:

1. Abridging and validating the timing and method of service and filing of the Notice of Motion, if necessary, so that this Motion is properly returnable, and so that further service thereof and the need to file a Record of Motion is dispensed with;
2. Extending the Stay Period (as defined in the Initial Order of this Court dated August 31, 2012) to April 8, 2013;
3. Sealing the Confidential Appendix to the Sixth Report of the Monitor (defined below);
4. Such further and other relief as may be just and appropriate.

The grounds to be argued upon the hearing of the motion are as follows:

1. The Companies were granted protection from their creditors under the CCAA pursuant to the Initial Order;
2. The activities of the Monitor pursuant to and since the granting of the Initial Order are described in the reports of the Monitor, including the Sixth Report of the Monitor (the "Sixth Report"), to be filed;
3. The Companies require additional time to close the sale of the Companies' remaining assets;
4. The Companies have sufficient funds to continue to operate through April 8, 2013 without a DIP; and
5. Such other grounds as are disclosed by the facts set out in the Sixth Report.

Upon the hearing of the within motion, the Monitor intends to rely upon the following statutory provisions and rules, namely:

1. The provisions of the CCAA;
2. Rules 1.03, 2.01, 2.02, 3.01, 38 and 39 of the *Rules of Court*;
3. The inherent jurisdiction of this Honourable Court; and
4. Such further and other provisions as counsel may advise and this Honourable Court may permit.

Upon the hearing of the motion, the following affidavit or other documentary evidence will be presented or relied upon:

A l'audition de la motion, les affidavits ou les autres preuves littérales suivantes seront présentées:

1. The Sixth Report and the Confidential Appendix thereto;
2. The Orders of this Honourable Court in these proceedings;
3. All materials filed with this Honourable Court in these proceedings; and
4. Such further and other affidavits or documentary and other evidence as counsel may advise and this Honourable Court may permit.

You are advised that:

- (a) You are entitled to issue documents and present evidence at the hearing in English or French or both;
- (b) The Applicant intends to proceed in the English language; and

Sachez que:

- (a) Vous avez le droit d'émettre des documents et de présenter votre preuve à l'audience en français, en Anglais ou dans les deux langues;
- (b) Le à l'intention d'utiliser la langue Anglais; et

(c) If you intend to proceed in the other official language, an interpreter may be required and you must so advise the clerk at least 7 days before the hearing.

(c) Si vous avez l'intention d'utiliser l'autre langue officielle, les services d'un interprète pourront être requis et vous devrez un aviser le greffier au moins 7 jours avant l'audience.

DATED at Toronto, Ontario, this 7th day of February, 2013.

STIKEMAN ELLIOTT LLP
Lawyers for the Court-appointed
Monitor of the Applicants,
Ernst & Young Inc.

STIKEMAN ELLIOTT

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Schedule "A"

PARTIES WITH COUNSEL OF RECORD

LANDDRILL INTERNATIONAL INC. (A BRITISH COLUMBIA CORPORATION),
LANDDRILL INTERNATIONAL LTD. (A NEW BRUNSWICK CORPORATION),
LANDDRILL ATLANTIC LTD. (A NEW BRUNSWICK CORPORATION),
LANDDRILL CONTRACT MINING LTD. (A NEW BRUNSWICK CORPORATION),
LANDDRILL INTERNATIONAL MEXICO S.A. DE C.V. (A MEXICAN CORPORATION), **LANDDRILL INTERNATIONAL LLC** (A MONGOLIAN CORPORATION) and **LANDDRILL INTERNATIONAL INC.** (A BARBADOS CORPORATION)

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Chartis Insurance Company	anni.lin@chartisinsurance.com
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Her Majesty the Queen in Right of the Province of British Columbia as Represented by the Minister of Finance P.O. Box 9417 Stn Prov Govt Victoria, BC V8W 9V1	
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TAB 2

IN THE COURT OF QUEEN'S BENCH OF NEW BRUNSWICK

TRIAL DIVISION

JUDICIAL DISTRICT OF MONCTON

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C.
1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF LANDDRILL INTERNATIONAL INC.

(A BRITISH COLUMBIA CORPORATION), LANDDRILL INTERNATIONAL LTD.

(A NEW BRUNSWICK CORPORATION), LANDDRILL ATLANTIC LTD.

(A NEW BRUNSWICK CORPORATION), LANDDRILL CONTRACT MINING
LTD.

(A NEW BRUNSWICK CORPORATION),

LANDDRILL INTERNATIONAL MEXICO S.A. DE C.V.

(A MEXICAN CORPORATION),

LANDDRILL INTERNATIONAL LLC (A MONGOLIAN CORPORATION) and

LANDDRILL INTERNATIONAL INC. (A BARBADOS CORPORATION)

(the "Applicants")

ORDER FOR STAY EXTENSION

WHEREAS the motion of Ernst & Young Inc., Court-appointed Monitor of the Applicants (the "**Monitor**"), seeking an extension of the Stay Period (as defined below) pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "**CCAA**"), was heard this 15th day of February, 2013 at 145 Assumption Blvd., Moncton, New Brunswick.

ON READING the Monitor's Sixth Report and the Brief on Motion of the Monitor;

AND UPON HEARING:

Ashley John Taylor, Counsel for the Monitor;

Stephen J. Hutchison, Counsel for the Applicants;

Mary Buttery, Counsel for Sprott Resource Lending Partnership;

Jeffrey M. Lee, Counsel for Norrep Credit Opportunities Fund and Crown Capital Partners Inc.; and

Alissa K. Mitchell, Counsel for GE Canada Equipment Financing, GP;

no one appearing for any other person on the Service List, although properly served as appears from the affidavit of service, filed:

SERVICE

1. THIS COURT ORDERS that the time for service of the Notice of Motion and the Motion Record is hereby abridged and validated so that this Motion is properly returnable today and hereby dispenses with further service thereof.

STAY EXTENSION

2. THIS COURT ORDERS that the Stay Period (as defined in paragraph 13 of the Initial Order of the Honourable Mr. Justice Smith dated August 31, 2012) is hereby extended until and including April 8, 2013.

SEALING ORDER

3. THIS COURT ORDERS that Confidential Appendix "A" to the Sixth Report be kept sealed, confidential and not form part of the public record, but rather shall be placed, separate and apart from all other contents of the Court file, in a sealed envelope attached to a notice which sets out the title of these proceedings and a statement that the

contents are subject to a sealing order and shall only be opened upon further order of the Court.

AID AND RECOGNITION

4. THIS COURT HEREBY REQUESTS the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada, Mexico, Mongolia or elsewhere to give effect to this Order and to assist the Applicants and the Monitor and their respective agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Monitor, as an officer of this Court, as may be necessary or desirable to give effect to this Order or to assist the Monitor and its agents in carrying out the terms of this Order.
