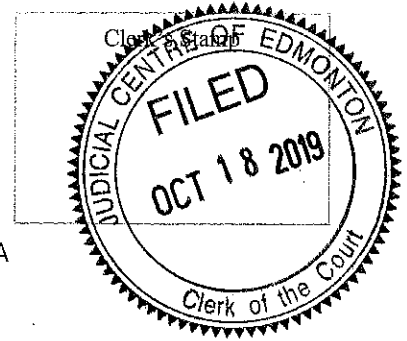


COURT FILE NUMBER 1703-12327
COURT COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE EDMONTON



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 ARRANGEMENT
OF 667402 ALBERTA LTD., 18512398 ALBERTA
LTD., 816956 ALBERTA LTD., 1371047 ALBERTA
LTD., 1919209 ALBERTA LTD. AND CANADA NORTH
GROUP LP HOLDINGS LTD.

DOCUMENT THE MONITOR'S TWENTY-SIXTH REPORT

October 18, 2019

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS DOCUMENT

MONITOR

ERNST & YOUNG INC.
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10423 - 101 Street, Suite 1400
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TABLE OF CONTENTS

PURPOSE OF THE REPORT	3
DISCLAIMER.....	4
BASIC FACTS AND TIMELINES IN RESPECT OF 726'S CLAIMS	4
COSTS OF THE MONITOR, ITS COUNSEL, AND CWB'S COUNSEL	8
OTHER MATTERS	10
CONCLUSIONS.....	11

SCHEDULES

- SCHEDULE A - Order of Master Schultz Pronounced January 18, 2018
- SCHEDULE B - Letter to McAllister LLP and Bishop McKenzie LLP dated July 5, 2018
- SCHEDULE C - Letter to Commercial Coordinator dated August 17, 2018
- SCHEDULE D - Letter to Commercial Coordinator dated September 18, 2018
- SCHEDULE E - Letter to Justice Hillier dated November 15, 2018
- SCHEDULE F - Monitor's Fees Related to 726 Matters
- SCHEDULE G - Monitor's Counsel's Fees (Redacted) Related to 726 Matters
- SCHEDULE H - Settlement Agreement between CWB, the Monitor and Sand Tiger

PURPOSE OF THE REPORT

1. Over the Course of these CCAA proceedings the Applicants and the Monitor have made several applications to this Court, which have not been outlined in this report, requesting various relief and corresponding extensions of the Stay. Prior to this report, the Monitor has filed twenty-four reports with the Court, issued one confidential report (the Confidential Twenty-Fourth Report) and issued ten unfiled Confidential Supplements in relation to its Eleventh, Twelfth, Thirteenth, Sixteenth, Seventeenth, Eighteenth, Twentieth, Twenty-First and Twenty-Second Reports. Copies of all filed Monitor's reports, materials filed by the Applicants, application materials and previous Orders of the Court can be accessed on the Monitor's website as noted in the disclaimer section of this report below.
2. As noted in the Monitor's 25th report, on May 14, 2019 the Honourable Justice Hillier released his Reasons for Judgement (the "**Reasons**") in respect of the ownership of, or priority to a number of assets located at the Bonnyville, Peace River, Wandering River and Kilometer 147 camps (collectively "the Contested Camp Assets"). The Reasons were in favour of Canadian Western Bank ("CWB") and the Monitor, and against 726 Remote Accommodations Ltd., 726 Modular Finance Ltd. and Reliant Asset Management, LLC (jointly "726"). In the Reasons, the Honourable Justice Hillier indicated that if the parties could not agree on costs within 60 days of the release of the Reasons, then the parties could speak to costs. At the end of the 60-day period, the Monitor wrote to Honourable Mr. Justice Hillier and requested an extension of this period with the consent of the parties, and a 45-day extension was granted. At the end of the 45-day period, no agreement on costs was reached between the parties, and a hearing date of November 6, 2019 was set down for the issue of costs.
3. The purpose of this brief report (the "**26th Report**") is to provide the Court and the Remaining Applicants' stakeholders with information in relation to the costs of the Monitor in advance of the hearing date currently set for November 6, 2019, and to support the Monitor's request for an Order awarding costs as against 726 in favour of the Monitor and CWB (in accordance with CWB's written submissions that are being filed concurrently with this Report).

DISCLAIMER

4. This 26th Report should be read in conjunction with all previously filed affidavits and reports, as well as Court Orders previously issued in these proceedings all of which, save for items directed to be sealed for confidentiality purposes, are available on the Monitor's website established for these proceedings that is located at <http://documentcentre.eycan.com/Pages/Main.aspx?SID=1410>. In addition, this 26th Report should be read in conjunction with any new materials filed with the Court by the Applicants (if any), or others, prior to the date of the upcoming application set for November 6, 2019.
5. This report should be read in conjunction with all reports previously filed by the Monitor, as well as all unfiled Confidential Supplements, as only new details not previously provided to the Court will be discussed herein, unless otherwise stated.
6. Unless otherwise stated, all references to monetary amounts contained herein are expressed in Canadian currency. Capitalized terms used herein not otherwise defined are as defined in the previous reports of the Monitor and other materials filed in connection with these CCAA proceedings to date.

BASIC FACTS AND TIMELINES IN RESPECT OF 726'S CLAIMS

7. The Paragraphs that follow outline at a high level a number of factors and events that occurred in relation to the 726 claims from the perspective of the Monitor. The below is not to be considered all-encompassing. Further details and events in relation to the numerous court applications in this regard have not been included in this report but are further detailed in the brief of the Monitor filed in connection with this application and the past reports of the Monitor, available on the Monitor's website.
8. The Initial Order was granted on July 5, 2017. Throughout the earliest stages of these proceedings, the Applicants indicated to the Court, the Monitor and the stakeholders that a significant number of the Contested Camp Assets were part of the property of the

Applicants, through various confidential Affidavits.

9. 726, through counsel, have equally been involved in these CCAA proceedings from the very early stages. Indeed, 726 was successful on October 25, 2017, by way of an Order of the Honourable Associate Chief Justice Nielsen, in having the Stay extended in 726's favour in respect of an action commenced by Kingdom Properties Ltd. ("Kingdom Properties") against it and one of the Applicants.
10. By way of a letter dated July 4, 2018 from counsel for Kingdom Properties, the Monitor learned that 726 had obtained an Order from Master Schulz on January 18, 2018 (the "**Master's Order**") in Court of Queen's Bench Action number 1703 23860, permitting 726 to remove a large number of assets, including a number of Contested Camp Assets, from the Kilometer 147 camp. Prior to that time, the Monitor was unaware of the existence of the Master's Order and was unaware that 726 had been removing assets from the Kilometer 147 camp. The Monitor had not been notified by 726 proceedings in Court of Queen's Bench Action number 1703 23860, but 726 had been aware of the Stay in effect in these CCAA proceedings. A copy of the Master's Order is attached as **Schedule "A"** to this report.
11. On July 5, 2018, counsel for the Monitor wrote to counsel for 726 advising that the Monitor had not been made aware of the Master's Order, that a number of the assets included in the Master's Order were the property of the Applicants and that 726 was to immediately cease removing any further assets from the Kilometer 147 camp. A copy of the letter of July 5, 2018 from the Monitor's counsel is attached as **Schedule "B"** to this report.
12. Thereafter, for the first time, 726 advised the Monitor that a number of assets that had been represented by the Applicants as being owned by them in these proceedings were in fact actually owned by 726. Afterwards, 726 did promptly begin to provide documentation to the Monitor in respect of its asset ownership claims, and corresponded with the Monitor regarding such claims
13. On July 24, 2018, the Monitor, representatives from 726 and their respective counsel met to discuss the ownership concerns and other related matters discussed above. In early

August, 2018, 726 continued to provide additional documentation to the Monitor in respect of its asset ownership claims. The Monitor continued to review and consider such documentation and claims.

14. On August 17, 2018, the Monitor's counsel wrote to the Commercial Coordinator to confirm a full day September 21, 2018 hearing date. That letter was copied to the service list, and indicated that the municipal tax issues and "certain ownership issues, priority issues and determinations" would be argued on September 21, 2018. At that time, it was anticipated that the issues surrounding the then known Contested Camp Assets would be argued on September 21, 2018. This letter prompted counsel for the MD of Greenview #16 to request a case management conference to discuss the matters that the Monitor anticipated would be heard on September 21, 2018. A copy of the letter of August 17, 2018 from the Monitor's counsel is attached as **Schedule "C"** to this report.
15. On September 6, 2018, a case management conference before the Honourable Mr. Justice Hillier occurred, who issued two Orders, without any opposition from any party. The first adjourned all of the property tax related issues until after the *Virginia Hills* decision was released. The second directed that all parties with claims (including all property and secured claims) in the assets held by the Applicants were to file Affidavits setting out their claims by certain specific dates in October 2018.
16. On September 10, 2018, the Monitor filed an Application returnable September 21, 2018 seeking certain directions in respect of securing of the known Contested Camp Assets and seeking approval for the liquidation of the "Small Wares." At that time, no party had presented a competing claim to the Monitor in respect of ownership of the Small Wares.
17. On September 12, 2018, just thirty minutes before the Court-Approved auction sale by Maynards of the surplus camp assets and other assets located at the Applicants' Farm, the Monitor received an email from 726 indicating that it "continued to believe" it was the rightful owner of six Atco Jack & Jill dorms which were slated to be sold in the auction that day. Prior to this time, despite requests by the Monitor, and attendance on site by both 726 and the Monitor, 726 was not able to provide any documentation in support of its ownership claims in this regard. In the interests of transparency, the Monitor advises that most of the serial numbers on the units in question had been removed by the Applicants

prior to the expansion of the Monitor's powers making proper identification difficult. As a result of 726's claim to ownership, and their demand that these dorms be removed from the sale, the Monitor agreed to have these units removed from the sale at almost the last moment possible, which added additional professional fees and other costs as a result.

18. On September 20, 2018, 726 advised the Monitor that it was claiming ownership of the Small Wares located within the dorms and alike units that were claimed by 726.
19. On September 21, 2018, the Honourable Mr. Justice Hillier granted an Order making certain directions in respect of the preservation of the then known Contested Camp Assets, and adjourning by consent the Monitor's relief in respect of the Small Wares to October 23, 2018.
20. On September 18, 2018, just prior to the September 21, 2018 hearing, the Monitor's counsel wrote to the Commercial Coordinator to confirm a full day October 23, 2018 hearing date. That letter was copied to the service list, and indicated that a number of issues and matters would be before the Court on that date, including without limitation seeking declarations regarding certain property/ownership claims made by 726, and the priority issues as between 726 and CNC. A copy of the letter of September 18, 2018 from the Monitor's counsel is attached as **Schedule "D"** to this report.
21. On October 11, 2018, the Monitor attended 726's storage site in Conklin, Alberta, on which it was storing the assets it had removed from the Kilometer 147 camp to conduct an inventory of the assets on that site. Based on the Monitor's inventory, it was discovered that a number of the assets removed by 726 from the Kilometer 147 camp had different serial numbers on them than were expressly set out in the Master's Order. These are primarily the "Removed Unit" and "Delivered Kitchen Units," previously discussed in these proceedings, which form part of the Contested Camp Assets. The Monitor previously advised the Court in several prior Reports that there were certain "Missing Assets" from Kilometer 147 that the Monitor could not locate, and as such, were the subject of an ongoing investigation being conducted by the Monitor. Shortly after the Monitor's attendance on site in Conklin and upon further review of the physical inventory of the assets located in Conklin, in comparison to the listing of Missing Assets, most of the Missing Assets were found to be in 726's possession. The Monitor had initially asked 726 if they

had taken these Missing Assets, and 726 indicated to the Monitor that they had not removed any of the assets in question. While the Monitor does not believe that 726 intentionally mislead the Monitor in this respect, the fact is that additional professional expenses were incurred by the Monitor looking for these assets because 726 had told the Monitor that it did not have them in its possession.

22. On November 15, 2018, the Monitor's counsel wrote to the Honourable Mr. Justice Hillier to seek certain case management directions in respect of 726. A copy of the letter of November 15, 2018 from the Monitor's counsel is attached as **Schedule "E"** to this report.
23. On November 21, 2018, at a case management conference, the Honourable Mr. Justice Hillier granted an Order that adjourned the hearings in respect to the Contested Camp Assets to January, 2019 (so that the questioning of Paul McCracken and Barry Roman could occur), permitted 726 to file supplementary evidence, and made directions in respect of certain pre-hearing steps to be completed.
24. Questioning on Affidavits of Paul McCracken and Barry Roman occurred on December 4, 5 and 6, 2018. Undertaking responses were thereafter provided by Paul McCracken and Barry Roman. Written interrogatories were also made of CWB.
25. Ultimately, hearings in respect of the Contested Camp Assets occurred on January 10, January 11, March 14 and March 15, 2019, albeit with adjournment and fresh evidence applications being brought by 726 on January 10 and 11, 2019.
26. Outside of the matters specifically identified above, the majority of the Monitor's additional time in relation to the 726 matters was spent updating the Court on the claims being made by 726 in numerous reports and supporting its counsel through the various applications and written submissions that occurred since these issues arose and dealing with various stakeholders, principally CWB, as required.

COSTS OF THE MONITOR, ITS COUNSEL, AND CWB'S COUNSEL

27. Attached as **Schedules F and G** to this report are the 726 related fees and costs of the

Monitor, and the redacted solicitor and client Bill of Costs of the Monitor's counsel related to 726 matters, respectively (collectively the "726 Accounts").

28. The Monitor advises that in certain instances, the time indicated by the Monitor and its counsel noted in the attached schedules as being attributable to dealing with the 726 related matters had to be reasonably estimated, as several of the specific time charges noted in the 726 Accounts included other work in relation to the Applicants on the given date reported.
29. The Monitor and its counsel further advise that they respectively have certainly made its best effort to accurately segregate or estimate their time, and further notes that neither has included or charged (as applicable) all of the applicable time that could be or was attributable to 726. For example, the Monitor's summary in Schedule F simply does not include a significant number of time entries that relate to 726 as the Monitor did not charge the estate in a number of instances. In the Monitor's counsel's Bill of Costs in Schedule G, many entries note that \$0.00 is being sought for the time that is the subject of such entries, notwithstanding that such time entries are valid and were paid by the Monitor. Further, no time entries for work done by the Monitor or its counsel in relation to 726 issues and dealings that were ultimately included within the scope of the 726 settlement that was approved by this Honourable Court on October 3, 2019 are included in Schedules F and G.
30. The Monitor and its counsel are not seeking to recovery amounts for such time because the work performed in such entries respecting 726 was not materially different than what the Monitor has had to perform in considering the claims of other creditors and or in dealing with other creditors. The Monitor and its counsel have endeavoured to only seek to recover amounts that were incurred because some unnecessary action of 726 (such as, without limitation, the time spent searching for missing assets that 726 denied it had, and dealing with 726's conduct in relation to the Master's Order) and/or work done in respect of:
 - a) the organization of the pre-hearing steps and Court filings;
 - b) preparation for case management conferences, questionings, applications and alike;

- c) attendance at case management conferences, questionings, applications and alike;
 - d) reviewing the evidence and written submissions of the other parties;
 - e) drafting written submissions;
 - f) preparing, negotiation and finalizing Orders;
 - g) drafting a Bill of Costs; and
 - h) other work done or tasks performed that are linked to the hearings regarding the Contested Camp Assets (either pre or post hearing dates).
31. Still further, no recovery of the Monitor's out of pocket costs for travel or other expenses is being sought.
32. The rates and charges applied by the Monitor and its counsel, as noted in the attached schedules, are the normal or standard rates and charges utilized by the personnel employed by the Monitor and its legal counsel's respective firms. It is the Monitor's view that the rates and amounts being charged as outlined in the attached schedules are fair, reasonable and appropriate in the circumstances, especially in light of the complexity and contentiousness of the 726 matters.
33. It is the Monitor's position that the fees and expenses outlined in the attached Schedules F and G are fair and reasonable and that 726 ought to be subject to a costs award in favour of the Monitor in the circumstances.

OTHER MATTERS

34. On or about September 25, 2019, CWB, the Monitor and Great White Sand Tiger Lodging Ltd. ("**Sand Tiger**") have agreed on the costs payable by Sand Tiger as a result of the pre-trial steps and hearings that resulted in the Reasons and resulting formal Order. As part of a broader agreement between CWB, the Monitor and Sand Tiger, by which Sand Tiger

purchased the "Small Wares" that they claimed in their dorm units from the Monitor for a modest sum, Sand Tiger also agreed to pay CWB the sum of \$5,500.00 in costs as a result of the Contested Camp Asset hearings. As part of this agreement, the Monitor agreed to not recover any costs from Sand Tiger for the Contested Camp Asset Hearings. Attached as **Schedule H** is a copy of the Settlement Agreement between CWB, the Monitor and Sand Tiger with additional (duplicate) pages confirming execution by all parties.

CONCLUSIONS

35. Based on the matters outlined in this report, the Monitor respectfully requests an Order awarding costs as against 726 in favour of the Monitor and CWB (in accordance with CWB's written submissions that are being filed concurrently with this Report).

All of which is respectfully submitted.

Dated at Edmonton, this 18th day of October 2019.

Ernst & Young Inc.

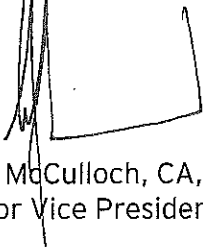
In its capacity as Monitor of

667402 Alberta Ltd.; 18512398 Alberta Ltd.; 816956 Alberta Ltd.; 1371047 Alberta Ltd.;

1919209 Alberta Ltd.; and Canada North Group LP Holdings Ltd.

and not in its personal or corporate capacity

Per:



Matt McCulloch, CA, CPA, CIRP, LIT
Senior Vice President

Schedule A

COURT FILE NUMBER

1703 23860
~~1603 21142~~

COURT

COURT OF QUEEN'S BENCH OF
ALBERTA

JUDICIAL CENTRE

EDMONTON

APPLICANT

726 MODULAR FINANCE CANADA, LTD.

RESPONDENT

KINGDOM PROPERTIES LTD.

DOCUMENT

ORDER

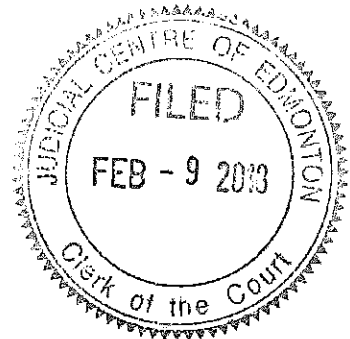
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CONTACT INFORMATION OF
PARTY FILING THIS DOCUMENT

MICHELLE ANDRESEN, McALLISTER LLP, Barristers & Solicitors
2500 Commerce Place, 10155 102 St, Edmonton AB T5J 4G8
Telephone: 780 425 2500 Facsimile: 780 425 1222
File No.: 87659-0

DATE ON WHICH ORDER WAS PRONOUNCED: January 18, 2018

LOCATION WHERE ORDER WAS PRONOUNCED: Edmonton, Alberta

NAME OF MASTER WHO MADE THIS ORDER: Master S.L. Schulz



I hereby certify this to be a
true copy of the original.

N. Harewa
for Clerk of the Court

UPON THE APPLICATION by the Applicant, 726 MODULAR FINANCE CANADA LTD. ("Applicant") and the CROSS-APPLICATION BY THE RESPONDENT, Kingdom Properties Ltd. ("Respondent"); AND UPON HAVING READ the Affidavits of Mr. Barry Roman and Mr. Jason King; AND UPON HEARING from counsel for both parties; AND UPON NOTING Rules. 6.49 and 6.50 of the Rules of Court, Alta Reg 124/2010;

IT IS HEREBY ORDERED AND DECLARED THAT:

1. The Respondent shall provide access to the Applicant to the lands described in Miscellaneous Land Lease Number MLL130166 ("166 Lands"), in accordance with a written schedule to be agreed upon by respective counsel, in order to decommission the 726 Equipment, which equipment is more particularly described in Schedule "A", attached hereto, and to subsequently remove the 726 Equipment from the 166 Lands.
2. Should counsel for the parties be unable to agree upon a schedule for the Applicant's access to the 166 Lands for the decommissioning and removal of the 726 Equipment, the parties shall return before the presiding Master in Chambers to determine same.
3. Costs of the decommissioning and removal of the 726 Equipment under para. 1, herein, shall be borne by the Applicant.

4. Prior to counsel scheduling the removal of the 726 Equipment under para. 1, herein, the Applicant shall post security to this Honourable Court in the amount of \$1 Million CDN (ONE MILLION CANADIAN DOLLARS).
5. The 726 Equipment shall not be removed from Alberta.
6. The Applicant shall not encumber, sell, or deal with the 726 Equipment in any way that interferes with ownership of the 726 Equipment or otherwise diminishes its value.
7. The Application to determine the legal ownership of the 726 Equipment is adjourned to the Master's Special Chambers date previously scheduled for the Summary Judgment Application of the Respondent in Court of Queen's Bench Action No. 1603 21142, which is currently set down for November 7, 2018. If the presiding Master, or the parties by consent, determine that the question of legal ownership cannot be dealt with before the Master hearing the said Summary Judgment Application, then the Application to determine ownership of the 726 Equipment shall be set for the next mutually convenient Master Special Chambers date.
8. The Applicant shall conclude the action for recovery and ownership of the 726 Equipment without delay and shall return the 726 Equipment to the Respondent, if so ordered by this Honourable Court at a future date.
9. The Applicant shall pay damages, costs and expenses sustained by the Respondent as a result of the within Order, if so ordered by this Honourable Court at a future date.
10. The Applicant shall file an Undertaking with respect to para. 9.
11. Costs shall be in the cause.

"W.S. Schlosser, Q.C."
M.C.C.Q.B.A.

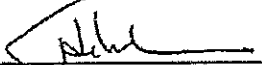
for S.L. Schlitz, Q.C.

CONSENTED TO AS TO FORM AND CONTENT

McAllister LLP

Per: 
Michelle E. Andresen,
Counsel for the Applicant

Bishop & McKenzie LLP

Per: 
Tara Hamelin,
Counsel for the Respondent

Equipment Schedule A for 726 Remote at Monias Lodge

Serial Number	Description	Manufacturer	Year Manufactured
WB5UK201338-001	12 unit KDR		
WB5UK201338-002	12 unit KDR		
WB5UK201338-003	12 unit KDR		
WB5UK201338-004	12 unit KDR		
WB5UK201338-005	12 unit KDR		
WB5UK201338-006	12 unit KDR		
FXCEGNT6U201326-001	12 unit KDR		
FXCEGNT6U201326-002	12 unit KDR		
FXCEGNT6U201326-003	12 unit KDR		
FXCEGNT6U201326-004	12 unit KDR		
FXCEGNT6U201326-005	12 unit KDR		
FXCEGNT6U201326-006	12 unit KDR		
FX30D201342-001	30' man skidded dorm		
FX30D201342-002	30' man skidded dorm		
FX30D201342-003	30' man skidded dorm		
FX30D201342-004	30' man skidded dorm		
FX30D201342-005	30' man skidded dorm		
FX30D201342-006	30' man skidded dorm		
FX30D201342-007	30' man skidded dorm		
FX30D201342-008	30' man skidded dorm		
FX30D201341-001	30' man skidded dorm		
FX30D201341-002	30' man skidded dorm		
FX30D201341-003	30' man skidded dorm		
FX30D201341-004	30' man skidded dorm		
FX30D201341-005	30' man skidded dorm		
FX30D201341-006	30' man skidded dorm		
FX30D201341-007	30' man skidded dorm		
FX30D201341-008	30' man skidded dorm		
201416FX-001	38' man dorm	CampCorp Canada	2014
201416FX-002	38' man dorm	CampCorp Canada	2014
201416FX-003	38' man dorm	CampCorp Canada	2014
201416FX-004	38' man dorm	CampCorp Canada	2014
201416FX-005	38' man dorm	CampCorp Canada	2014
201416FX-006	38' man dorm	CampCorp Canada	2014
201416FX-007	38' man dorm	CampCorp Canada	2014
201416FX-008	38' man dorm	CampCorp Canada	2014



Equipment Schedule A for 726 Remote at Monias Lodge

Serial Number	Description	Manufacturer	Year Manufactured
201417FXRAM-001	38' man dorm	CampCorp Canada	2014
201417FXRAM-002	38' man dorm	CampCorp Canada	2014
201417FXRAM-003	38' man dorm	CampCorp Canada	2014
201417FXRAM-004	38' man dorm	CampCorp Canada	2014
201417FXRAM-005	38' man dorm	CampCorp Canada	2014
201417FXRAM-006	38' man dorm	CampCorp Canada	2014
201417FXRAM-007	38' man dorm	CampCorp Canada	2014
201417FXRAM-008	38' man dorm	CampCorp Canada	2014
FX4UREC20133-001	4 unit recreation		
FX4UREC20133-002	4 unit recreation		
FX4UREC20133-003	4 unit recreation		
FX4UREC20133-004	4 unit recreation		
FX6UR201319-001	6 unit recreation		
FX6UR201319-002	6 unit recreation		
FX6UR201319-003	6 unit recreation		
FX6UR201319-004	6 unit recreation		
FX6UR201319-005	6 unit recreation		
FX6UR201319-006	6 unit recreation		
NHAF4861	38' man skidded dorm	Alta-Fab Structures	2014
NHAF4862	38' man skidded dorm	Alta-Fab Structures	2014
NHAF4863	38' man skidded dorm	Alta-Fab Structures	2014
NHAF4864	38' man skidded dorm	Alta-Fab Structures	2014
NHAF4865	38' man skidded dorm	Alta-Fab Structures	2014
NHAF4866	38' man skidded dorm	Alta-Fab Structures	2014
NHAF4867	38' man skidded dorm	Alta-Fab Structures	2014
NHAF4868	38' man skidded dorm	Alta-Fab Structures	2014
NHAF0861	30' man VIP dorm	Alta-Fab Structures	2008
NHAF0862	30' man VIP dorm	Alta-Fab Structures	2008
NHAF0863	30' man VIP dorm	Alta-Fab Structures	2008
NHAF0864	30' man VIP dorm	Alta-Fab Structures	2008
NHAF0865	30' man VIP dorm	Alta-Fab Structures	2008
NHAF0866	30' man VIP dorm	Alta-Fab Structures	2008
NHAF0867	30' man VIP dorm	Alta-Fab Structures	2008
NHAF0868	30' man VIP dorm	Alta-Fab Structures	2008
n/a	2500 Fir Access Mats	Breakaway Matting	

Schedule B



Our File: 445-196164

Lawyer: Ryan Quinlan
Telephone: 780.441.4336
Email: rquinlan@dcllp.com
Fax: 780.428.9683

July 5, 2018

Via Email

McAllister LLP
10155 – 102 Street, Suite 2500
Commerce Place
Edmonton, AB T5J 4G8

Bishop & McKenzie LLP
Suite 2300, 10180 – 101 Street NW
Edmonton, AB T5J 1V3

Attention: Michelle Andresen

Attention: Tara L. Hamelin

Via Email: mandresen@mcallisterllp.com

Via Email: thamelin@bmlip.ca

Dear Mesdames:

**Re: Court Action No.1703-12327 – Companies' Creditors Arrangement Act
Proceedings in respect of Canada North Group of Companies
Court of Queen's Bench Action No. 1703-23860 - 726 Modular Finance
Canada, Ltd. ("726") v. Kingdom Properties Ltd. ("Kingdom")**

Please be advised that we are counsel for Ernst & Young Inc. in its capacity as Court appointed Monitor of the various Canada North Group of Companies (the "Monitor") included in the above mentioned CCAA proceedings. The Monitor has been granted extended powers to effectively make it a "Super Monitor" under the CCAA in respect of the Applicants.

To date, the Monitor has been unable to obtain access to the so-called Monias or Kilometer 147 campsite, which is currently occupied by Kingdom. Further to a letter from Ms. Hamelin of yesterday's date, it was indicated that the Monitor may obtain access to the site potentially after 726 removes all of its alleged assets from site. In that letter, Ms. Hamelin provided us with a copy of the Order of Master Schulz dated January 18, 2018 (the "Master's Order") permitting 726 to attend the site and remove certain assets listed in Schedule "A." Until yesterday, the Monitor was unaware that 726 was removing assets from this campsite.

Please be advised the Applicants in the CCAA proceedings claim ownership of many of the assets included in Schedule "A" to the Master's Order. A copy of Schedule "A" is enclosed with this letter, and those items which have been highlighted are those which the Applicants assert ownership of and over, according to their respective corporate books and records.

www.dcllp.com

780.428.6036 ■ 1.800.782.9409 ■ Fax: 780.428.9683
2800 Scotia Place, 10060 Jasper Avenue, Edmonton, Alberta T5J 3V9

As a result, the Monitor, on behalf of the Applicants in these CCAA proceedings, hereby demands that:

(a) to the extent that any of the highlighted assets have not been removed from the site, that they not be further de-mobilized, removed or in any manner disturbed until this ownership issue is dealt with by agreement of the parties or further Order of the Court;

(b) to the extent that any of the highlighted items have already been removed or relocated, that the Monitor be notified of their current location(s) and be provided access to them in coordination with representatives of 726; and

(c) the highlighted assets not be sold, transferred, or otherwise disposed until this ownership issue is dealt with by agreement of the parties or further Order of the Court.

It is also worth noting that to the extent the Applicants' ownership in the claimed assets is determined to be valid, this removal and dealing with them has occurred in breach of the stay granted by the Initial Order in the CCAA proceedings.

Further, the Monitor hereby requires immediate access to the Monias/Kilometer 147 campsite currently occupied by Kingdom. The Monitor, of course, is willing to coordinate access with Kingdom's representatives being on site; however, no costs will be paid in respect of the Monitor obtaining access to the site. We draw your attention to paragraph 27 of the Initial Order granted in the CCAA Proceedings on July 5, 2017.

We ask each of you to kindly confirm your client's agreement to the above on an as soon as possible basis. The Monitor reserves all right and remedies.

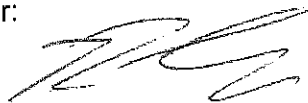
Finally, Ms. Andresen, can you please kindly provide us with a copy of the Affidavit(s) used in your client's action against Kingdom that provisionally established ownership of the items included in Schedule "A" of the Master's Order? The reason for this request is that the Monitor would like to review and assess such ownership documents to assist in determining the competing ownership claims, with the hope of potentially resolving this ownership issue promptly and consensually.

We trust the foregoing will be in order. However, please do not hesitate to contact me to further discuss this matter.

Yours truly,

DUNCAN CRAIG LLP

Per:



RYAN QUINLAN

RQ/cs

Equipment Schedule A for 726 Remote at Monias Lodge

Serial Number	Description	Manufacturer	Year Manufactured
WB5UK201338-001	12 unit KDR		
WB5UK201338-002	12 unit KDR		
WB5UK201338-003	12 unit KDR		
WB5UK201338-004	12 unit KDR		
WB5UK201338-005	12 unit KDR		
WB5UK201338-006	12 unit KDR		
FXCEGNT6U201326-001	12 unit KDR		
FXCEGNT6U201326-002	12 unit KDR		
FXCEGNT6U201326-003	12 unit KDR		
FXCEGNT6U201326-004	12 unit KDR		
FXCEGNT6U201326-005	12 unit KDR		
FXCEGNT6U201326-006	12 unit KDR		
FX30D201342-001	30' man skidded dorm		
FX30D201342-002	30' man skidded dorm		
FX30D201342-003	30' man skidded dorm		
FX30D201342-004	30' man skidded dorm		
FX30D201342-005	30' man skidded dorm		
FX30D201342-006	30' man skidded dorm		
FX30D201342-007	30' man skidded dorm		
FX30D201342-008	30' man skidded dorm		
FX30D201341-001	30' man skidded dorm		
FX30D201341-002	30' man skidded dorm		
FX30D201341-003	30' man skidded dorm		
FX30D201341-004	30' man skidded dorm		
FX30D201341-005	30' man skidded dorm		
FX30D201341-006	30' man skidded dorm		
FX30D201341-007	30' man skidded dorm		
FX30D201341-008	30' man skidded dorm		
201416FX-001	38' man dorm	CampCorp Canada	2014
201416FX-002	38' man dorm	CampCorp Canada	2014
201416FX-003	38' man dorm	CampCorp Canada	2014
201416FX-004	38' man dorm	CampCorp Canada	2014
201416FX-005	38' man dorm	CampCorp Canada	2014
201416FX-006	38' man dorm	CampCorp Canada	2014
201416FX-007	38' man dorm	CampCorp Canada	2014
201416FX-008	38' man dorm	CampCorp Canada	2014

Equipment Schedule A for 726 Remote at Monias Lodge

Serial Number	Description	Manufacturer	Year Manufactured
201417FXRAM-001	38' man dorm	CampCorp Canada	2014
201417FXRAM-002	38' man dorm	CampCorp Canada	2014
201417FXRAM-003	38' man dorm	CampCorp Canada	2014
201417FXRAM-004	38' man dorm	CampCorp Canada	2014
201417FXRAM-005	38' man dorm	CampCorp Canada	2014
201417FXRAM-006	38' man dorm	CampCorp Canada	2014
201417FXRAM-007	38' man dorm	CampCorp Canada	2014
201417FXRAM-008	38' man dorm	CampCorp Canada	2014
FX4UREC20133-001	4 unit recreation		
FX4UREC20133-002	4 unit recreation		
FX4UREC20133-003	4 unit recreation		
FX4UREC20133-004	4 unit recreation		
FX6UR201319-001	6 unit recreation		
FX6UR201319-002	6 unit recreation		
FX6UR201319-003	6 unit recreation		
FX6UR201319-004	6 unit recreation		
FX6UR201319-005	6 unit recreation		
FX6UR201319-006	6 unit recreation		
NHAF4861	38' man skidded dorm	Alta-Fab Structures	2014
NHAF4862	38' man skidded dorm	Alta-Fab Structures	2014
NHAF4863	38' man skidded dorm	Alta-Fab Structures	2014
NHAF4864	38' man skidded dorm	Alta-Fab Structures	2014
NHAF4865	38' man skidded dorm	Alta-Fab Structures	2014
NHAF4866	38' man skidded dorm	Alta-Fab Structures	2014
NHAF4867	38' man skidded dorm	Alta-Fab Structures	2014
NHAF4868	38' man skidded dorm	Alta-Fab Structures	2014
NHAF0861	30' man VIP dorm	Alta-Fab Structures	2008
NHAF0862	30' man VIP dorm	Alta-Fab Structures	2008
NHAF0863	30' man VIP dorm	Alta-Fab Structures	2008
NHAF0864	30' man VIP dorm	Alta-Fab Structures	2008
NHAF0865	30' man VIP dorm	Alta-Fab Structures	2008
NHAF0866	30' man VIP dorm	Alta-Fab Structures	2008
NHAF0867	30' man VIP dorm	Alta-Fab Structures	2008
NHAF0868	30' man VIP dorm	Alta-Fab Structures	2008
n/a	2500 Fir Access Mats	Breakaway Matting	

Schedule C



Our File: 445-196164

Your File:

Lawyer:

Telephone:

Email:

Fax:

Ryan Quinlan

780.441.4336

rquinlan@dcllp.com

780.428.9683

August 17, 2018

SENT VIA FAX: 780-427-5622

Court of Queen's Bench of Alberta
Law Courts Building
1A Sir Winston Churchill Square
Edmonton, AB T5J 0R2

Attention: Sharon Hinz

Dear Madam:

**Re: In the Matter of a Plan of Arrangement of 667402 Alberta Ltd. et al.
Court of Queen's Bench of Alberta Action Number: 1703 12327
Commercial List Application Scheduled to be Heard before the Honourable Mr.
Justice S. D. Hillier on Friday, September 21, 2018 at 10:00 a.m. (the "Application")**

We are the solicitors for Ernst & Young Inc. in its capacity as the court appointed Monitor of the Applicants in this matter. By way of this letter, we confirm that this matter has been booked for full day before the Honourable Mr. Justice S. D. Hillier on Friday, September 21, 2018 at 10:00 a.m.

The Monitor anticipates seeking advice and direction in respect of a number of issues and matters, including without limitation:

- (a) the appropriate hold back from the sale proceeds of the Farm for allocation of the Administration Charge and Interim Lender's Charge, if applicable;
- (b) a potential interim distribution of the sale proceeds from the Winterburn yard;
- (c) certain ownership issues, priority issues and determinations; and
- (d) certain municipal tax related issues.

Additional matters or issues may be added to those identified above prior to the filing deadline. We anticipate providing you with copies of the Application and materials in support of the Application by our filing deadline.

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2800 Scotia Place, 10060 Jasper Avenue, Edmonton, Alberta T5J 3V9

4130-1539-1766.v1

Duncan Craig LLP

August 17, 2018

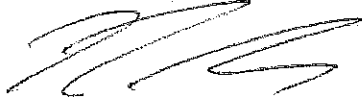
Page 2

Thank you very much for your assistance in this matter. Should you have any questions or concerns with respect to the above, please do not hesitate to contact me directly.

Yours truly,

DUNCAN CRAIG LLP

Per:

A handwritten signature in black ink, appearing to be 'R. Quinlan', written over a horizontal line.

RYAN QUINLAN

RQ/mq

c.c.: Service List

Schedule D



Our File: 445-196164

Your File:

Lawyer:
Telephone:
Email:
Fax:

Ryan Quinlan
780.441.4336
rquinlan@dclp.com
780.428.9683

September 18, 2018

SENT VIA FAX: 780-427-5622

Court of Queen's Bench of Alberta
Law Courts Building
1A Sir Winston Churchill Square
Edmonton, AB T5J 0R2

Attention: Sharon Hinz

Dear Madam:

**Re: In the Matter of a Plan of Arrangement of 667402 Alberta Ltd. et al.
Court of Queen's Bench of Alberta Action Number: 1703 12327
October 23, 2018 Application rescheduled for a full day Application at 10:00 a.m.
before the Honourable Mr. Justice K. G. Nielsen**

We are the solicitors for Ernst & Young Inc. in its capacity as the court appointed Monitor of the Applicants in this matter.

By way of this letter, we confirm that this matter previously booked for a half day Application at 2:00 p.m. has been rescheduled for a full day Application before the Honourable Mr. Justice K. G. Nielsen on Tuesday, **October 23, 2018 at 10:00 a.m.**

The Monitor anticipates seeking declarations, or advice and direction, as applicable, from the Court in respect of a number of issues and matters, including without limitation:

- (a) property/ownership claims made by 726 Remote Accommodations Ltd. ("726") (and perhaps other parties) in respect of certain assets;
- (b) priority issues in respect of certain assets, as between 726 and 18512398 Alberta Ltd. (formerly known as Canada North Camps Inc.);
- (c) the validity of certain mortgages registered in favour of Weslease Income Growth Fund LP and/or Weslease of Canada Ltd.; and
- (d) the validity of a mortgage registered in favour of Jeff and Jackie Hadfield.

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Duncan Craig LLP

September 18, 2018

Page 2

The Monitor is also hoping to be in a position to seek relief in respect of one or more sales at this hearing, but such matters remain pending.

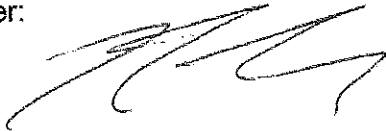
We anticipate providing you with copies of the Application and materials in support of the Application by our filing deadline.

Thank you very much for your assistance in this matter. Should you have any questions or concerns with respect to the above, please do not hesitate to contact me directly.

Yours truly,

DUNCAN CRAIG LLP

Per:

A handwritten signature in black ink, appearing to be 'R. Quinlan', written over a horizontal line.

RYAN QUINLAN

RQ/mq

c.c.: Service List

Schedule E



Our File: 204-196164

Your File:

Lawyer:
Telephone:
Email:
Fax:

Darren R. Bieganek, QC
780.441.4386
dbieganek@dcllp.com
780.969.6381

November 15, 2018

Via E-mail

The Honourable Mr. Justice S.D. Hillier
c/o Commercial Court Coordinator
Court of Queen's Bench of Alberta
Law Courts Building
1A Sir Winston Churchill Square
Edmonton, AB T5J 0R2

Attention: Sharon Hinz

Dear Mr. Justice S.D. Hillier:

Re: In the Matter of a Plan of Arrangement of 667402 Alberta Ltd. et al
QB Action Number 1703 12327
Applications Scheduled for December 4 and 5, 2018

With reference to the above captioned matter, I am writing to you in my capacity as counsel to the Monitor to provide you with an update on the anticipated proceedings for the two dates presently scheduled for hearings before you and to request some time early next week, either before you directly or by way of telephone conference, to obtain case management directions with respect to one of the matters which was anticipated to go before you on those dates but for reasons which will be explained below is no longer in a position to proceed.

To begin with, we initially anticipated the matters to be addressed your Lordship on December 4 and 5 were as follows:

- a) The municipal tax issue and priority for same against equipment located at the Applicant Camps (the "Municipal Tax Issue"). The parties involved in that particular application are the municipalities, the Monitor, Canadian Western Bank ("CWB") and various equipment lessors/claimants;
- b) The ownership and priority issue in respect of certain camp equipment claimed by 726 Remote Accommodations Ltd./726 Modular Financing ("726") and what the Monitor has termed the "Small Wares Issue". The parties affected by those issues include CWB, 726 and a company called Great White Sand Tiger Ltd. (small wares only) ("Sand Tiger"). Other parties have expressed an interest in participating but largely on a watching brief basis. Those parties include

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Kingdom Properties Ltd. and Aurora Lodging Inc. (for ease of reference refer to these issues as the "726 Issues");

- c) Kingdom Properties Ltd. and 726 suggested at the last appearance before Justice Nielsen that they may have ownership issues to address before your Lordship on December 4 and 5 (the "Kingdom Issues");
- d) The Monitor has three items which it needs to address:
 - a. A small housekeeping matter arising from the sale of the farm and payment to First Island Financial Services Ltd. ("First Island") which is not anticipated to be contested;
 - b. Approval of the sale of a kitchen unit; and
 - c. The extension of the stay of proceedings.

All of the Monitor's issues herein simply referred to as the "Monitor's Application".

In respect of the matters noted above, it appears that the only matter which will be proceeding on December 4 or 5 is the Monitor's Application.

With respect to the balance of matters:

- a) On the Municipal Tax Issue, the parties are awaiting receipt of the Court of Appeal's decision in the *Virginia Hills* matter. Even if we were to be in receipt of that decision next week, it is not feasible for the parties to digest the decision, determine its ramifications or applicability for the issues before the Court and prepare the appropriate Briefs of Law to address same. The parties affected by that application have agreed that the matter should simply be adjourned indefinitely pending the issuance of the Court of Appeal's decision in *Virginia Hills*;
- b) With respect to the 726 Issues, the Monitor seeks some case management direction from you. Christa Nicholson of JSS Barristers in Calgary has recently been appointed counsel for 726 (and other interests which may be engaged in relation to the issues which are before the Court) to deal with the priority and certain ownership issues. That retainer is just in the process of being finalized. The parties had scheduled a questioning of Mr. McCracken and Barry Roman, 726's affiant, for tomorrow but given the late retention of insolvency counsel, that questioning cannot proceed. Ms. Nicholson is not available to proceed tomorrow with the questioning of Mr. McCracken. The Monitor and others are not prepared to proceed with questioning of Mr. McCracken and Mr. Roman on separate days (despite Mr. Roman's availability on November 16, 2018). Pushing the questioning to Ms. Nicholson's available dates will not afford the parties adequate time to put together briefs or transcripts for December 4 or 5. While the Monitor, and certainly others, recognize new counsel need to be accommodated, the Monitor is quite concerned with delaying this application inordinately as the issue of entitlement to the units claimed by 726 is holding up progress in terms of bringing this matter to some form of conclusion. It affects everything. Simply by way of explanation, if the units are declared to be owned by 726 and not subject to any security of, for example, the Bank, then that is going to have an affect on additional recovery and, by extension, the cost allocations. If the units are declared to be the property of the Applicants and subject to CWB's security, they will then need to be liquidated

and that too will, by extension, have an affect on recovery and the cost allocations. Until this issue is addressed, this matter cannot be moved toward finalization and it is imperative for all parties concerned that the application proceed.

While we believe counsel could readily craft a form of Procedural Order to address questioning, we, at this stage, do not yet have the Commercial List Assignments for the New Year and will therefore need some guidance from the Court on scheduling that application, timing for questioning and the exchange of materials. To that end, we are requesting an opportunity to address those matters directly with you, as noted at the commencement of this letter, either by way of telephone conference or appearance. The parties who have expressed interest in being included in that hearing or conference call are: myself (for the Monitor), Ms. Nicholson, Mr. McAllister and Ms. Clarke, Ms. Nicholson's associate (if Ms. Nicholson is unavailable) (for 726), Mr. Russell (for the Bank), Messrs. Flewelling and Chimuk (for Sand Tiger), Ms. Hamelin (for Kingdom), Messrs. Sigurd and Stefan Delblanc (for the McCrackens), Mr. Lenz (for Northland Mortgage), and Mr. Rohatyn and Ms. Frydenlund (for Aurora Lodging). 726 will also be making application at the case management meeting for an Order granting it leave to file an additional Affidavit which describes additional ancillary equipment claimed by 726.

- c) I have also been advised by counsel for Kingdom and 726 that any matters to be addressed between those parties will be addressed after the 726 Issues have been addressed.

As it stands at the moment, we therefore believe that the December 5th date can be released. We will need probably no more than two or three blocks on December 4 in the morning to address the Monitor's Application.

The parties look forward to hearing from your Lordship in respect of your availability to hold a case management meeting to address the matters noted above with respect to the 726 Issue and until then remain,

Yours truly,

DUNCAN CRAIG LLP

Per:



DARREN R. BIEGANEK, QC
DRB/kjs

cc: Service List

Schedule F

Charged Hours Details - Canada North Camps - CCAA						
Employee Name	Transaction Date	Charged Hours	726 Hours (Estimate)	Charged Hours Description	Rate	Charged Total
Dan McCulloch	07 May 2018	4.6	2.3	Calls with Jim Benedict re security at a number of sites; calls with GPS to set security checks at the farm; read and respond to emails re asset and employee matters; team discussions on numerous matters	\$ 395.00	\$ 1,817.00
Matt McCulloch	13 Jul 2018	4.3	1	Call with D McCulloch re attendance at Farm; calls with R Quinlan re Bonnyville (crews on site dismantling without Monitor's knowledge, RAM issues); calls with RAM re Bonnyville; Calls with Northland re Bonnyville; direction to EY staff re payables and banking reconciliations; email review and other related work.	\$ 575.00	\$ 2,472.50
Mark Shtay	24 Jul 2018	3.9	3.5	Call w/ Matt Best - farm keysCall w/ Delton - Asset Claim Email to Dennis - ALPAC POCsCall w/ Jim @ FarmCall w/ Shayne re: TractorCall to Dennis Froese - ALPACMeet with Ram Modular on Asset Claims.	\$ 180.00	\$ 702.00
Mark Shtay	25 Jul 2018	4	1.5	Update asset list with June FSV and summarise RAM assets.Cut Keys - RepairFarm Visit - Check keys worked.	\$ 180.00	\$ 720.00
Matt McCulloch	25 Jul 2018	3.6	0.2	Call with J Taha re CWB analysis and related matters (and 726 meeting); Continued work on CWB analysis; call with M Eklund re Bonnyville related matters and other questions; other misc work.	\$ 575.00	\$ 2,070.00
Mark Shtay	31 Jul 2018	3.9	0.2	Send Bonnyville pics to RyanEmail to Walt re: Water PlantCall to Jim Benedict - RamCall with Shayne re: PanelsEmail to Shayne re: CimmarronA/R Demand Letters	\$ 180.00	\$ 702.00
Mark Shtay	01 Aug 2018	3.9	0.2	Deposit chqsCall with Jim Benedict re: Conklin visitPay Direct Energy x 5, EpcorCall to Direct Energy A/P analysis	\$ 180.00	\$ 702.00
Matt McCulloch	07 Aug 2018	4.3	0.3	call with Barry Roman; return numerous telephone calls; emails to Northland; calls with Ryan Quinlan; email review/respond as required; email to P Harrison re HML; other related work	\$ 575.00	\$ 2,472.50
Mark Shtay	13 Aug 2018	2.9	0.2	Reply to Ryans Email re: BonnyvilleCall to Ray Wilk re: Ram Dorms @ FarmPay Jeff Hadfield, GPSEmail to Rod re: Camp SecurityContact all Camp sites to notify of visitCall to Ryan @ CompleteEmail to Rod, Monias Directions	\$ 180.00	\$ 522.00
Dan McCulloch	14 Aug 2018	3	3	Attendance at site to review boxes and potential claim of RAM; mark disputed boxes	\$ 395.00	\$ 1,185.00
Mark Shtay	14 Aug 2018	3.2	2.9	Call to Jim Benedict re: Dorms @ Farmland Titles search , WabascaFarm Visit to ID Ram Dorms	\$ 180.00	\$ 576.00
Mark Shtay	15 Aug 2018	3.8	0.3	Work on Asset List to Don CherniawskyCall to Rod DuhamelCall w/ Jim Anderson re: ROEMarkup Farm Aerial with Ram UnitsMeeting with Chuck & Jesse Work on 2nd A/R Letters	\$ 180.00	\$ 684.00
Matt McCulloch	15 Aug 2018	7	1	Review of emails from C Russell and preparation for meeting with CWB this afternoon; calls with counsel re meeting and other matters; review of 726 farm dorm matter with M Shtay; various email correspondence; meeting with CWB and meeting with counsel thereafter regarding meeting discussions.	\$ 575.00	\$ 4,025.00
Mark Shtay	21 Aug 2018	2.2	0.5	Reconcile Keyera Partnership A/RCall w/ Jim Benedict Farm VisitEmail to len Kopp - KeyeraCall w/ Jenette @ G&R InsulatingEmail to Roger re: Bushmen Ent.Email to David Flynn re: A/R Demand	\$ 180.00	\$ 396.00
						\$ 90.00

Charged Hours Details - Canada North Camps - CCAA						
Employee Name	Transaction Date	Charged Hours	726 Hours (Estimate)	Charged Hours Description	Rate	Charged Total
Dan McCulloch	07 May 2018	4.6	2.3	Calls with Jim Benedict re security at a number of sites; calls with GPS to set security checks at the farm; read and respond to emails re asset and employee matters; team discussions on numerous matters	\$ 395.00	\$ 1,817.00
Mark Shtay	22 Aug 2018	2.6	1.5	Visit to Farm w/ Jim Benedict RAMPay GPS & Crystal SpringsEmail to BushmenBank Rec	\$ 180.00	\$ 468.00
Matt McCulloch	22 Aug 2018	5.3	1.5	Travel to and from Farm to meet with 726 and tour site; email review; call with counsel re First Island land sale and related matters and other file related matters; final revisions to Used modular agreements; second call with counsel re First Island matters	\$ 575.00	\$ 3,047.50
Mark Shtay	23 Aug 2018	2.3	0.4	Email to Dan Cherniawsky - Asset ListCall w/ Rod DuhamelCall to Ron VictorCall w/ Jim @ RAM - Update and Aerial PicCall w/ Katrina @ Grizzly ElectricEmail to Jenna re: WEPP emailEmail to Zoe HoydaEmail to Roger @ Keyera InvoiceMidwest Pipelines A/R Reconcile	\$ 180.00	\$ 414.00
Mark Shtay	28 Aug 2018	5	0.5	Go through XTO A/RCall w/ Brian AOS re: rig matsSend HML pics to briansetup meeting with Rod.Update asset list w/ Matt re: RAM claims.Meet with Rod Duhamel. Debrief on report on camps.	\$ 180.00	\$ 900.00
Mark Shtay	29 Aug 2018	4.7	0.2	Call w/ Brian to get on site.Call to Jeff Hadfield @ W.R.Call to Hillary Cardinal re: Wabasca WaterEmail to HillarySort throughmail stack.Visit to CNC Office to pickup mail. Deposit to Spilak, Delphi, Hammerhead & Grizzle cheques.Email to Ryan re: Rig matremoval monias.Email to Barry - Petro InvoiceEmail to Red Ram - Epcor InvoiceA/P Review with Matt	\$ 180.00	\$ 846.00
Mark Shtay	04 Sep 2018	2.5	1.7	Call w/ Rod Duhamel - Barry ownership, Altafab offers. Email to Barry Roman re: missing assets @ Monias.Email to Rod re: AOS offerEmail to CNC re: Missing Monias AssetsEmail to Barry Roman Mat RemovalEmail to Darcy re: Mats at moniasEmail to Ryan re: rig matsCall to Jason KingMonias Asset List to MattCall w/ Brian Kitchen & Dorm Offer	\$ 185.00	\$ 462.50
Mark Shtay	05 Sep 2018	3.8	1.3	Email to Pete Missing AssetsEmail to Jim/Barry W.R KitchenCall w/ Brian AOSEmail to Nigel XTO InvoicesReview AOS BidCall w/ Rod Duhamel Smallware etc.Call w/ Dustin AOS - rig matt offerEmail to Shayne & Rob Assets @ MoniasEmail to Jim - Sale of Rig MatsWabasca Inventory ListEmail to Matt - Pics of Bonnyville	\$ 185.00	\$ 703.00
Mark Shtay	06 Sep 2018	4.2	0.6	Email to Ryan/Matt re: Monias Mats Call w/ Alex @ Bonnyville - InventoryEmail to Susan @ CNC re: XTO ARCall w/ Brian @ AOS - Altafab @ W.RReview Bonnyville Asset ownership. Email to Mike @ Maynards - Ram and Sysco units.Call w/ Ray Wilk - Separate Dorms @ FarmCall to Larry - Altafab offer AOS bid review - W.R and HML AssetsBonnyville asset summary to MattMonias asset Summary to MattPay EY, Used Mods, GPS & MD no. 17.	\$ 185.00	\$ 777.00
Dan McCulloch	11 Sep 2018	1.2	0.2	Read and respond to emails from M McIntosh re Cimarron camp; discuss same with M McCulloch; email from M McIntosh and call regarding removal of RAM units from sale	\$ 410.00	\$ 492.00
						\$ 82.00

Charged Hours Details - Canada North Camps - CCAA						
Employee Name	Transaction Date	Charged Hours	726 Hours (Estimate)	Charged Hours Description	Rate	726 Total
Dan McCulloch	07 May 2018	4.6	2.3	Calls with Jim Benedict re security at a number of sites; calls with GPS to set security checks at the farm; read and respond to emails re asset and employee matters; team discussions on numerous matters	\$ 395.00 \$	\$ 908.50
Mark Shtay	11 Sep 2018	4.2	0.3	Call to Mike @ Maynards Lot list @ FarmCall to Jim Benedict - Peace River UpdateCall to Brian AOS site visitEmail to Brian - Peace River AssetsEmail to Kurtis - Red Ram - Epcor BillsEmail to Jim - Brian VisitDeposit Servus chequeCall w/ Rod - WinterizationCall w/ Mike : Auction Lot listEmail to MikeA/R Letters	\$ 185.00 \$	\$ 55.50
Mark Shtay	12 Sep 2018	5.5	0.2	Send Pics to Brian - WabascaReceive & upload Peace River picsEmail/Call to Mike (Maynards) Pull 726 Dorms.A/R LettersCall w. Curtis - Derrick ConcreteSmallware email to - Foothills, Ron Victor, Kastner Auctions, Garry HannahCall with Rod re: Camp watchCall with Rod - Doug Snow updateSummary of Outstanding A/REmail to Pamela XTO EnergyEmail to Kim - HML SecurityEmail to Dustin - Camp Watch	\$ 185.00 \$	\$ 37.00
Matt McCulloch	12 Sep 2018	5.1	1.8	misc file work, address emails, calls with counsel on various matters; also deal with removal of dorms claimed by 726 from auction at the last minute - emails and discussions re same, instructions to staff re same;	\$ 595.00 \$	\$ 1,071.00
Mark Shtay	13 Sep 2018	5.7	0.6	Summary of Missing assets @ SitesCall w/ Asefa - Camp watchCall w/ Rod - HML, Fencing at siteCall w/ Dustin - AOS Smallware, Small assetsCall w/ Jim - Camp watch @ HMLCall w/ Dustin - Service/Sale contractEmail to Susan/Beryl Pembina InvoiceEmail to Bryan re: Name ChangeEmail to Mike - Ram Lot NumbersEmail to Trina/Tom - Site watch HMLEmail to Beryl re: Name changeReview Ram dormspulledBook meeting room Email to CNC ALPAC trailers 122 @ Derrick ConcreteCreate Invoice to Delton @ Doug Snow	\$ 185.00 \$	\$ 111.00
Matt McCulloch	13 Sep 2018	2.8	0.2	Misc email review and respond/address; calls with counsel re 726 matters, auction matters, agenda for meeting tomorrow and other related work.	\$ 595.00 \$	\$ 119.00
Mark Shtay	18 Sep 2018	3.2	0.2	Email Susan/Kim - Missing AssetsEmail to Jim - 726 Assets @ ConklinPrint Carma Invoice for MattDeposit Milden Cheq and update SRDUpdate SRD for Keyera and BrockPay Challenge InsuranceCall w/ Telus - HML & WAB InterntCall w/ Jim @ HMLCall with Jeff @ Wabasca	\$ 185.00 \$	\$ 37.00
Mark Shtay	20 Sep 2018	5.9	0.7	Call w/ Epcor - W.R and Farm InvoiceCall with FortisPay Tom KlemmerPay EpcorCall to Mike @ Maynards - Unit 411Call to Kingpin Trailers Call to Asefa - Winterize HMLReview Telus Invoice - Backout CNC Call w/ Telus - Pay Bill Ref04625940Deposit Sundown ChequeCall w/ Jason King - Mats & Missing AssetsEmail RCMP - Monias AssetsEmail to Rand - Get Telus Authorization	\$ 185.00 \$	\$ 129.50
Matt McCulloch	20 Sep 2018	3.1	0.2	Call with RQ re court related matters (for tomorrow); discussion with M Shtay re payables; additional calls with RQ re court tomorrow to address questions and other misc file related work.	\$ 595.00 \$	\$ 119.00
Mark Shtay	24 Sep 2018	3.4	1.3	Call w/ Jim - Update on Monias, PaymentPickup CNC mailRCMP Station for ReportCall w/ Jim BenedictUpdate Telus Invoice	\$ 185.00 \$	\$ 240.50

Charged Hours Details - Canada North Camps - CCAA						
Employee Name	Transaction Date	Charged Hours	726 Hours (Estimate)	Charged Hours Description	Rate	Charged Total
Dan McCulloch	07 May 2018	4.6	2.3	Calls with Jim Benedict re security at a number of sites; calls with GPS to set security checks at the farm; read and respond to emails re asset and employee matters; team discussions on numerous matters	\$ 395.00	\$ 1,817.00
Dan McCulloch	02 Oct 2018	1.6	0.4	Read and respond to emails re insurance, security, books and records, assets at farm and auction; discussions with M Shtay re Monias assets, insurance claim, and removal of assets from the farm; discussions with M McCulloch; emails to R Quinlan	\$ 410.00	\$ 656.00
Mark Shtay	05 Oct 2018	2.4	0.4	Call with Jim BenedictEmail w/ Mike Farm cleanupPay Altagas, Epcor, Direct Energy x 5	\$ 185.00	\$ 444.00
Matt McCulloch	09 Oct 2018	5	2.5	Calls with Counsel re 18th report and Conf Supp, along with other file related matters; continued work on 18th report and Supplement; email review, misc other work	\$ 595.00	\$ 2,975.00
Matt McCulloch	10 Oct 2018	3.9	0.8	call with Used Modulars, email review and catch up; calls (multiple) with counsel on 18th report matters, 726 matters, examinations of Paul M and other related matters; additional work on 18th report	\$ 595.00	\$ 2,320.50
Mark Shtay	11 Oct 2018	10	10	Site Visit to Monias and Conklin. Check on Mat Removal and Missing assets in Conklin.	\$ 185.00	\$ 1,850.00
Mark Shtay	12 Oct 2018	5.5	1.1	Call with Ryan - Update on Conklin visitUpload PicsEmail to Ryan on AssetsCall with Ray Wilk - Farm UpdateCall with Mark - Paradox - Mat RemovalCall with Jim - Mats and Road issueCall with Louise - Mat Removal	\$ 185.00	\$ 1,017.50
Matt McCulloch	12 Oct 2018	1.1	0.3	call with counsel re missing assets; discussion with M Shtay re Farm and bin for Dorm purchaser; discussion and investigation of Modus dorms at Monias with M Shtay;	\$ 595.00	\$ 654.50
Mark Shtay	15 Oct 2018	2	0.5	Call w/ Louise - Mats at MoniasCall with Asefa - Update and Final PayEmail to Rod - Cooler PickupEmail to Rand- Tech Equipment at FarmCall w/ Jim - Farm CleanupEmail to Jim - Follow up on dorm removal	\$ 185.00	\$ 370.00
Matt McCulloch	15 Oct 2018	5.9	1	post application materials to WEB (approval); review A/R CNRL; review email; Preliminary work on 19th Report, Calls with Counsel resume, other related work	\$ 595.00	\$ 3,510.50
Matt McCulloch	16 Oct 2018	3.3	0.8	continued work on 19th Report; email review; 19th report schedules; finalize report for final review by counsel; review of 726 missing asset emails from counsel; conference call with counsel re 726 matters, 19th report CNRL A/R and other matters	\$ 595.00	\$ 1,963.50
Mark Shtay	17 Oct 2018	6.1	0.4	Visit to Office and Farm- Pickup Mail- Check on Water- Receive HML Truck- Check on Dorm Clean UpCall to Ray Wilk - Trailer at FarmEmail to Jim - Mat CountUpload Pics of FarmCall to Jim - Update on HMLAsset list to Bryan Rev 1Email pics to Ryan - Remaining Farm AssetsEmail to Mike @ Maynards - HML TruckEmail to Jim - Mat CountCall w/ Rod Duhamel - Sale updateCall Bin rental companiesEmail to Rick Wan - Telus Bankrupt.	\$ 185.00	\$ 1,128.50
Matt McCulloch	17 Oct 2018	0.8	0.2	Multiple calls with M Shtay re Farm issues/asset removal. Call with Ryan Q regarding 726 position on "Missing Assets", 19 Report, and Farm matters	\$ 595.00	\$ 476.00
					\$ 595.00	\$ 119.00

Charged Hours Details - Canada North Camps - CCAA						
Employee Name	Transaction Date	Charged Hours	726 Hours (Estimate)	Charged Hours Description	Rate	726 Total
Dan McCulloch	07 May 2018	4.6	2.3	Calls with Jim Benedict re security at a number of sites; calls with GPS to set security checks at the farm; read and respond to emails re asset and employee matters; team discussions on numerous matters	\$ 395.00 \$	\$ 908.50
Mark Shtay	26 Oct 2018	2	0.5	Call w/ Jim - Truck to HMLCall to Jim Benedict - Road BanCall w/ Wayne Lacombe - Bluewave EnergyEmail to Cst. Griep - Close File.Call with Rod - Lift stations, Kitchen etc.Call to Norman at ACME. Bin Issue.Call to Grayson - Site Update	\$ 185.00 \$	\$ 92.50
Mark Shtay	13 Nov 2018	2.3	0.2	Call to Jeff, Alex and Jim - Update on security at camps.Call with Jim Benedict - Update on CampsCall w/ Matt - Farm update, Rod Sales, Kitchen at HML.Call w/ Rod - Update on decisions.Email to Grant/Mark - Clearance for HML.Email to Grant - Demob Start Date.Call to Jeff @ W.R Inventory Lift Stations.Email to Randy - Confirm Parking Rails	\$ 185.00 \$	\$ 37.00
Matt McCulloch	20 Nov 2018	3.3	0.2	Internal Meeting with M Shtay re potential asset sales, and other file related matters; review of Bonnyville 726 matters in considering insurance coverage; call with R Bros re Arizona dorms; call with counsel re Northland pending call; conference call with Northland and counsel.	\$ 595.00 \$	\$ 119.00
Mark Shtay	27 Nov 2018	3.9	0.6	Pick up Mail from CNC office.Collect all 726 communication to Darren.Call to Direct Energy. Look for Simonette Coordinates.Callw/ Sid Northgate Industries.Email to Matt & Ryan re: Sids commentsPay Direct Energy x5Call w/ Ron Victor- AOS offer valuation	\$ 185.00 \$	\$ 111.00
Matt McCulloch	04 Dec 2018	0.3	0.2	call w RQ re court + Northland	\$ 595.00 \$	\$ 119.00
Matt McCulloch	05 Dec 2018	0.4	0.2	email catch up; call with R Quinlan re questioning; other misc work on file (time very conservative, most time incurred on CNC today not charged to file)	\$ 595.00 \$	\$ 119.00
Matt McCulloch	07 Dec 2018	0.2	0.2	Review of email from counsel re questioning; call with D Bleganek re instructions re same.	\$ 595.00 \$	\$ 119.00
Matt McCulloch	12 Dec 2018	0.8	0.4	Call with counsel re Monitor's next report, call with M Shtay re Rec unit pending sale, other file related work (minor).	\$ 595.00 \$	\$ 238.00
Matt McCulloch	07 Jan 2018	2.6	0.9	email review - additional specific emails (in addition to time not charged disclosed separately as admin); report/brief review fromemail; court related emails; other misc file related work; call with counsel re 736 matters and court for later this week.	\$ 595.00 \$	\$ 535.50
Matt McCulloch	14 Jan 2018	7.2	2	Accounting and allocation work for 22nd report; travel to and fromand meeting with counsel on realization strategy, status, report and other related matters	\$ 595.00 \$	\$ 1,190.00
Mark Shtay	28 Jan 2019	6.7	0.6	Send request for auction catalogue to Maynards.Review/Reconcile Asset lists.Send follow up to CNC.Send follow up to 726.Reconcile Vehicle Asset List.Send Follow up to RAM.Sign, Scan and Send Indemnity Agmt to DCLLP.Run 22nd report to DCLLP office.Email toShayne/CNC to explain assets.Email to Barry and Jim to Explain Assets.	\$ 185.00 \$	\$ 111.00

Charged Hours Details - Canada North Camps - CCAA						
Employee Name	Transaction Date	Charged Hours	726 Hours (Estimate)	Charged Hours Description	Rate	726 Total
Dan McCulloch	07 May 2018	4.6	2.3	Calls with Jim Benedict re security at a number of sites; calls with GPS to set security checks at the farm; read and respond to emails re asset and employee matters; team discussions on numerous matters	\$ 395.00 \$	908.50 \$
Mark Shtay	29 Jan 2019	3.5	0.2	Drive to CNC office pickup mail.Call/ Brian AOS - Wire Confirmation.Email to Mark @ DCLLP to confirm closing.Reconcile Vehicle list.Pay Epcor, Direct Energy/Invoice to Derrick Concrete.Call w/ Jim Benedict - responding to email.	\$ 185.00 \$	37.00 \$
Matt McCulloch	28 Feb 2019	0.9	0.2	Call with counsel re RFP and other file related matters; second call with counsel re potential discussions with 726	\$ 595.00 \$	119.00 \$
Matt McCulloch	15 Mar 2019	0.6	0.6	Search for 726 related emails for RQ (Court req'd), call with R Quinlan re same	\$ 595.00 \$	357.00 \$
Mark Shtay	20 Mar 2019	2.1	0.4	Email to Devin Norris - Settlement Stmt.Deposit Iron Planet Cheque.Call w/ Louise - Phil HarrisonEmail to Matt - Phil Issue.Email to Matt - AOS Tank Info.Call w/ Matt - Re Phil and AOS.Call w/ Cst. Lemay - RCMP - Phil Harrison.Email to Jim and Barry @ RAM.	\$ 185.00 \$	74.00 \$
Matt McCulloch	14 May 2019	2.7	1	email response to J Flannigan (M Ross) re update on matter; explornet emails review and send to Susan R at Lodgisty; review court decision re 726; call with counsel on 726 decision and related mattersexst steps; call with counsel re P Harrison; other related work	\$ 595.00 \$	595.00 \$
					Sub-Total	\$ 71,326.00 \$ 18,966.00
					GST	\$ 3,566.30 \$ 948.30
					Total	\$ 74,892.30 \$ 19,914.30

Schedule G

Form 44
Rule 10.35(1)

Clerk's Stamp

COURT FILE NO. 1703 12327

COURT Court of Queen's Bench of Alberta

JUDICIAL CENTRE Edmonton

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 ARRANGEMENT OF 667402
ALBERTA LTD., 18512398 ALBERTA LTD., 816956 ALBERTA LTD.,
1371047 ALBERTA LTD., 1919209 ALBERTA LTD. AND CANADA
NORTH GROUP LP HOLDINGS LTD.

DOCUMENT SOLICITOR AND OWN CLIENT BILL OF COSTS

ADDRESS FOR
SERVICE AND
CONTACT
INFORMATION OF
PARTY FILING THIS
DOCUMENT

Darren R. Bieganeck, QC/Ryan F.T.
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DUNCAN CRAIG LLP
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3V9

**SOLICITOR AND OWN CLIENT BILL OF COSTS PREPARED BY DUNCAN CRAIG LLP ON
BEHALF OF ERNST & YOUNG INC., IN ITS CAPACITY AS THE COURT APPOINTED
MONITOR**

4145-5969-9485.v4

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
07/17/18	RYAN QUINLAN	Email correspondence with counsel for 726 Remote Accommodation regarding ownership claim and property taxes; [REDACTED]	5.90 (0.30 only)	0.00
07/18/18	RYAN QUINLAN	Telephone call with counsel for CRA; Telephone call with counsel for Daycare; Telephone calls with counsel for 726 Remote Accommodations; Telephone calls with Monitor; [REDACTED]	2.60 (0.30 only)	0.00
07/19/18	RYAN QUINLAN	[REDACTED] Telephone calls with Monitor regarding [REDACTED] 726 Remote ownership claims; [REDACTED]	4.80 (0.50 only)	0.00

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
07/24/18	RYAN QUINLAN	[REDACTED] Meeting with Monitor, Barry Roman and 726 Remote Accommodations counsel regarding ownership disputes, dissolution of partnerships, outstanding receivables on Arizona dorms and other issues;	4.50 <u>(3.50 only)</u>	0.00
07/31/18	RYAN QUINLAN	[REDACTED]; Telephone calls with Monitor regarding [REDACTED] 726 ownership claims; [REDACTED]	3.00 <u>(0.30 only)</u>	0.00
08/01/18	RYAN QUINLAN	Telephone call with S. Wanke regarding 726 Remote Accommodations ownership claims; Email correspondence with S. Wanke regarding 726 Remote Accommodations ownership claims; [REDACTED] [REDACTED]; Telephone calls with Monitor, [REDACTED]; Email correspondence with counsel for 726 Remote Accommodations; Telephone call with Barry Roman; Reviewing new partnership related documents;	2.50 <u>(2.00 only)</u>	0.00
08/07/18	RYAN QUINLAN	[REDACTED] [REDACTED], Reviewing new limited partnership and co-ownership of land agreements provided; Reviewing new ownership documents provided by 726 Remote Accommodations; [REDACTED]	3.80 <u>(1.00 only)</u>	0.00

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
08/08/18	RYAN QUINLAN	Reviewing serial number searches for assets on which offers have been obtained and memo to Monitor regarding ability to sell; [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED], Conference call with Monitor, McCrackens and S. Wanke regarding 726 ownership claims and HML issues; Conference call with Monitor, CWB and C. Russell regarding 726 ownership claims, [REDACTED] [REDACTED] Telephone call with Monitors regarding various issues; Reviewing documents provided by Barry Roman; Telephone call with counsel for Barry Roman; [REDACTED] [REDACTED]	4.10 (2.80 only)	0.00
08/13/18	RYAN QUINLAN	[REDACTED] [REDACTED] [REDACTED] [REDACTED] Telephone calls with Monitor regarding various issues; Reviewing 726 ownership documents; Email correspondence with counsel for regarding 726 documents; [REDACTED] [REDACTED] [REDACTED], Drafting list of missing items from 726; [REDACTED] [REDACTED] Email correspondence with Monitor regarding various issues;	5.80 (3.90 only)	0.00
08/14/18	RYAN QUINLAN	[REDACTED] [REDACTED], Reviewing 726 ownership documents; Email correspondence with counsel for regarding 726 documents; [REDACTED] [REDACTED] [REDACTED], Drafting list of missing items from 726;	1.90 (1.00 only)	0.00

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
08/15/18	RYAN QUINLAN	[REDACTED] Email correspondence with counsel for 726 Remote Accommodations regarding further information and documents required to consider ownership claim; Email correspondence with S. Wanke regarding further information and documents received from 726 Remote Accommodations and further information needed from McCrackens; [REDACTED] [REDACTED] Telephone call with Monitor regarding [REDACTED] 726 Remote Accommodation Claims [REDACTED] [REDACTED]	6.00 (0.60 only)	0.00
08/20/18	RYAN QUINLAN	[REDACTED] [REDACTED] Email correspondence with B. Roman; Reviewing new documents provided by B. Roman; [REDACTED] [REDACTED] [REDACTED] Reviewing and revising Monitor's email to B. roman; [REDACTED] [REDACTED]	4.10 (1.10 only)	0.00
08/23/18	RYAN QUINLAN	[REDACTED] [REDACTED] Conference with B. Angove for research on priority issues; Drafting list of issues to be included on September 21 application; [REDACTED] [REDACTED] [REDACTED]	1.80 (0.20 only)	0.00

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
08/24/18	BRAD ANGOVE	Research re priority dispute;	1.10	220.00
08/26/18	RYAN QUINLAN	[REDACTED] [REDACTED] [REDACTED] E-mail correspondence with counsel for 726 Remote Accommodations; [REDACTED] [REDACTED]	2.20 <u>(0.30 only)</u>	0.00
08/26/18	BRAD ANGOVE	Research re priority dispute issue;	1.60	320.00
08/27/18	BRAD ANGOVE	Continued research re priority dispute;	2.30	460.00
08/27/18	RYAN QUINLAN	[REDACTED] Telephone calls with Monitor regarding various issues; [REDACTED] [REDACTED]; E-mail correspondence with D. McAllister; [REDACTED]	6.00 <u>(0.20 only)</u>	0.00
08/28/18	BRAD ANGOVE	Finish creating memo re priority dispute;	1.10	220.00
08/28/18	RYAN QUINLAN	[REDACTED] [REDACTED] [REDACTED] Reviewing research memo from B. Angove; E-mail correspondence with D. McAllister; [REDACTED] [REDACTED]	2.30 <u>(0.40 only)</u>	0.00

[illegible]

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
09/04/18	RYAN QUINLAN	[REDACTED] [REDACTED] E-mail correspondence with the Monitor regarding various issues; E-mail correspondence with 726; [REDACTED] [REDACTED] [REDACTED] E-mail correspondence with the Monitor; Telephone call with the Monitor;	1.30 (0.40 only)	0.00
09/05/18	RYAN QUINLAN	[REDACTED] [REDACTED] E-mail correspondence with Monitor; [REDACTED] [REDACTED] E-mail correspondence with 726; [REDACTED] [REDACTED] [REDACTED] Telephone call with Monitor; [REDACTED] [REDACTED]	1.60 (0.60 only)	0.00
09/06/18	RYAN QUINLAN	Preparing for case management hearing; Telephone call with Monitor; Attending case management hearing by phone; [REDACTED] [REDACTED] [REDACTED] Email correspondence with D. McAllister; [REDACTED] [REDACTED] [REDACTED]	3.80 (3.50 only)	0.00
09/07/18	RYAN QUINLAN	[REDACTED] [REDACTED] [REDACTED] Telephone calls with Monitor; E- mail correspondence with Monitor; [REDACTED] [REDACTED] [REDACTED] [REDACTED] Reviewing draft Orders from Case Management meeting; Telephone call with D. McAllister;	5.40 (0.90 only)	0.00

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
09/10/18	RYAN QUINLAN	[REDACTED] Telephone calls with Monitor; [REDACTED] Telephone call with D. McAllister; Email correspondence with D. McAllister; [REDACTED] E-mail correspondence with Monitor regarding various issues; [REDACTED] [REDACTED]	8.50 (1.90 only)	0.00
09/11/18	RYAN QUINLAN	Reviewing draft case management orders; [REDACTED] [REDACTED]; E-mail correspondence with Monitor regarding various issues; Telephone call with Monitor; E-mail correspondence with D. McAllister; Revising 726 sale agreement; reviewing unanimous shareholders agreements related to partnerships for priority dispute with 726; [REDACTED] [REDACTED]	1.40 (0.80 only)	0.00
09/12/18	RYAN QUINLAN	Telephone calls with Monitor regarding alleged 726 assets in auction; E-mail correspondence with Monitor regarding various issues; E-mail correspondence with Maynards' regarding pulling contested 726 dorms from auction; E-mail correspondence with D. McAllister regarding pulling contested 726 dorms from auction; Telephone calls with D. McAllister regarding pulling contested 726 dorms from auction; Drafting Monitor's reservation of rights e-mail to 726; [REDACTED] [REDACTED]	2.70	972.00

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
09/17/18	RYAN QUINLAN	E-mail correspondence with Monitor regarding various issues; Telephone call with Monitor regarding various issues; [REDACTED] E-mail correspondence with D. McAllister regarding September 21 application and sale of Monias mats and settlement of Arizona dorms issue; E-mail correspondence with B. Roman regarding ownership of dorms at farm; [REDACTED]	2.30 (0.70 only)	0.00
09/18/18	RYAN QUINLAN	[REDACTED] Revising letter to Court; [REDACTED] Telephone call with D. McAllister; [REDACTED] E-mail correspondence with D. McAllister; [REDACTED] Drafting second letter to Court; [REDACTED] E-mail correspondence with Monitor; Telephone call with Monitor; [REDACTED] regarding [REDACTED]	3.10 (0.80 only)	0.00
09/20/18	RYAN QUINLAN	Preparing for September 21 application; [REDACTED] Telephone calls with Monitor; E-mail correspondence with Monitor; [REDACTED] Telephone call with D. McAllister; [REDACTED] E-mail correspondence with D. McAllister; and R. Flewelling regarding small wares adjournment; Telephone call to R. Russell; [REDACTED]	9.10 (3.00 only)	1,080.00
09/21/18	RYAN QUINLAN	[REDACTED] E-mail correspondence with Monitor; Revising form of Order for September 21 hearing; Attending September 21 hearing; [REDACTED]	7.90 (1.00 only)	360.00

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
09/24/18	RYAN QUINLAN	[REDACTED], E-mail correspondence with Monitor; [REDACTED] E-mail correspondence with D. McAllister; Conference with D. Bieganeck regarding ownership and priority issues and research and further documents needed for the same; [REDACTED]	1.40 (1.00 only)	0.00
09/25/18	RYAN QUINLAN	Telephone call with D. McAllister; [REDACTED]; E-mail correspondence with Monitor regarding many issues; Conference call with D. Bieganeck and Monitor regarding outstanding tasks, issues and the October 23 application; [REDACTED]	4.70 (0.30 only)	0.00
09/28/18	RYAN QUINLAN	Telephone call with Monitor; [REDACTED]; E-mail correspondence with D. McAllister; E-mail correspondence with Monitor regarding various issues; [REDACTED]	0.90 (0.20 only)	0.00
10/01/18	RYAN QUINLAN	[REDACTED]; E-mail correspondence with D. McAllister; [REDACTED] E-mail correspondence with Monitor regarding various issues; [REDACTED] [REDACTED] Reviewing 726 Bonnyville documents for bench brief purposes;	3.70 (2.00 only)	0.00
10/02/18	RYAN QUINLAN	Telephone call with D. McAllister; Telephone call with Monitor regarding various issues; E-mail correspondence with Monitor regarding various issues; [REDACTED]	5.90 (0.90 only)	0.00

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
10/02/18	DARREN R. BIEGANEK, QC	Receive and review e-mails re dorms, sales and farm sale; and other matters including funds received for initial B. Roman transaction;	0.30 <u>(0.30 only)</u>	0.00
10/03/18	RYAN QUINLAN	Telephone call with D. McAllister; Telephone calls (four) with Monitor; E-mail correspondence with Monitor regarding various issues [REDACTED] [REDACTED] Reviewing documents regarding authority of P. McCracken to provide GSAs to Canada North from Partnerships and drafting memo regarding the same; [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED], E-mail correspondence with D. McAllister; [REDACTED]	3.40 <u>(2.60 only)</u>	400.00
10/06/18	RYAN QUINLAN	Reviewing new Affidavits of 726, Weslease, Hadfields, Great West Sand Tiger; [REDACTED]	2.10 <u>(1.40 only)</u>	504.00
10/08/18	RYAN QUINLAN	E-mail correspondence with R. Flewelling; Drafting brief for October 23 Application;	5.50 <u>(5.00 only)</u>	1,800.00
10/09/18	RYAN QUINLAN	Telephone call with D. McAllister; E-mail correspondence with D. McAllister; [REDACTED] [REDACTED] Drafting brief for October 23 application; Telephone calls with Monitor (four calls); E-mail correspondence with Monitor; Drafting memo to Monitor regarding P. McCracken signing authority for partnerships; [REDACTED] [REDACTED]	11.20 <u>(8.10 only)</u>	2,916.00
10/09/18	DARREN R. BIEGANEK, QC	[REDACTED] Review affidavits re claims; Consider issues arising on 726 allegations and evidence; Confer with R. Quinlan; [REDACTED] [REDACTED] Lengthy telephone conference with Monitor;	4.70 <u>(3.70 only)</u>	1,942.50

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
10/10/18	DARREN R. BIEGANEK, QC	[REDACTED] Telephone call with C. Russell re 726 claims; Call with Monitor to review matter and request instructions to question B. Roman; Instructions provided; E-mail and telephone call with counsel for 726 re questioning and outstanding issues; Telephone call with S. Delblanc; e-mail to counsel re questioning; [REDACTED]	4.90 (3.60 only)	1,890.00
10/11/18	DARREN R. BIEGANEK, QC	Receive and review e-mails re questioning and scheduling confirmations;	0.20	105.00
10/12/18	DARREN R. BIEGANEK, QC	Update from associate on assets found at Conklin;	0.20	105.00
10/12/18	DARREN R. BIEGANEK, QC	Review e-mails re missing assets now found;	0.20	105.00
10/12/18	RYAN QUINLAN	Telephone calls with Monitor; E-mail correspondence with Monitor regarding various issues; [REDACTED] Drafting correspondence to D. McAllister regarding location of missing dorns in 726's possession; [REDACTED]	1.50 (0.70 only)	252.00
10/15/18	RYAN QUINLAN	[REDACTED] E-mail correspondence with Monitor regarding various issues; Telephone calls with Monitor (three calls); [REDACTED] Drafting demand to 726 regarding Monias assets taken without authority; [REDACTED] E-mail correspondence with D. McAllister;	3.60 (1.90 only)	684.00
10/16/18	RYAN QUINLAN	Telephone calls with Monitor regarding various issues (three calls); E-mail correspondence with Monitor regarding various issues; E-mail correspondence with D. McAllister; Telephone call with D. McAllister; E-mail correspondence with C. Russell;	1.70 (1.20 only)	432.00

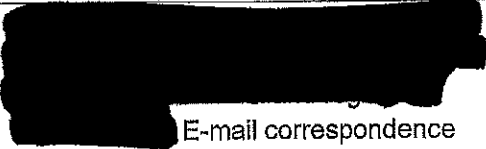
DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
10/17/18	RYAN QUINLAN	Telephone call with D. McAllister; E-mail correspondence with D. McAllister; Telephone calls with Monitor; E-mail correspondence with Monitor regarding various issues; Drafting memo to Monitor regarding new ownership claims of 726; [REDACTED] Conference with B. Angove regarding research issue;	2.80 (1.80 only)	648.00
10/19/18	RYAN QUINLAN	[REDACTED]; Telephone call with D. McAllister; Reviewing draft Bill of Sale on remaining farm dorns; [REDACTED]	1.80 (0.20 only)	0.00
10/22/18	RYAN QUINLAN	[REDACTED]; E-mail correspondence with Monitor regarding various issues; E-mail correspondence with D. McAllister; [REDACTED]	7.10 (0.20 only)	0.00
10/23/18	RYAN QUINLAN	[REDACTED]; E-mail correspondence with D. McAllister; E-mail correspondence with S. Delblanc; [REDACTED]	7.20 (0.20 only)	0.00
10/25/18	RYAN QUINLAN	E-mail correspondence with Monitor; [REDACTED]; Reviewing letter from D. McAllister; [REDACTED]	2.60 (0.20 only)	0.00
10/29/18	RYAN QUINLAN	E-mail correspondence with Monitor; E-mail correspondence with D. McAllister; Reviewing general ledgers of partnerships;	0.50	180.00
11/10/18	DARREN R. BIEGANEK. QC	Receive. review and reply to e-mail from D. McAllister;	0.20	105.00
11/12/18	DARREN R. BIEGANEK. QC	Review C. Russell notes on documents in preparation for questioning;	0.40	210.00
11/12/18	DARREN R. BIEGANEK. QC	Review agreements and financial statements in starting preparation for questioning;	0.50	262.50

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
11/14/18	DARREN R. BIEGANEK. QC	Review material in preparation for questioning; Receive and review e-mails from C. Nicholson and D. McAllister re changes to counsel and delaying proceedings request; E-mails reply: E-mail to Client; Telephone call with C. Nicholson; Telephone call with counsel for CWB; Telephone call with Monitor to discuss requested delay and other matters and to receive instructions; Draft and send e-mail to the service list;	2.50	1,312.50
11/14/18	RYAN QUINLAN	E-mail correspondence with Monitor; E-mail correspondence regarding Questioning of Roman and McCracken;	0.20	72.00
11/15/18	DARREN R. BIEGANEK. QC	Lengthy call with C. Nicholson; Receive comments from S. Delblanc on letter: Revise same;	0.40	210.00
11/15/18	DARREN R. BIEGANEK. QC	Receive and review e-mails from C. Russell and C. Nicholson; Telephone call with D. McAllister; [REDACTED];	0.30 (0.20 only)	105.00
11/15/18	DARREN R. BIEGANEK. QC	Receive and review e-mails from D. McAllister; Revise letter to the Court;	0.40	210.00
11/20/18	RYAN QUINLAN	E-mail correspondence with Monitor; Telephone call with Monitor; [REDACTED]; E-mail correspondence with D. McAllister; Reviewing new 726 Application and Affidavit; [REDACTED];	0.80 (0.40 only)	144.00
11/21/18	DARREN R. BIEGANEK. QC	Prepare for case management hearing; Attend court to address case management issues re 726; Directions given; Draft order; Draft e-mail to participating parties; Draft e-mail to the service list;	2.00	1,050.00
11/23/18	DARREN R. BIEGANEK. QC	Receive voice-mail from C. Russell; Revise Case Management Order;	0.20	105.00
11/23/18	DARREN R. BIEGANEK. QC	Receive and review e-mail from C. Russell re changes to order; Revise same; E-mail to group;	0.20	105.00
11/23/18	DARREN R. BIEGANEK. QC	Receive and review e-mail from C. Nicholson regarding terms of order; Reply to same;	0.20	105.00
11/25/18	DARREN R. BIEGANEK. QC	Receive and review series of e-mails between C. Nicholson and C. Russell; Reply to e-mails from C. Nicholson; Send confidential material to C. Nicholson and D. McAllister; Review ledgers and information on file; E-mail to client requesting comment: Notes re cross-examination preparation; E-mail reply to C. Nicholson; [REDACTED];	2.10 (1.50 only)	787.50

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
11/27/18	RYAN QUINLAN	Reviewing new 726 Application and Affidavit Reviewing file and documents from 726 for preparation for Questioning; [REDACTED]	2.70 (2.00 only)	720.00
11/27/18	DARREN R. BIEGANEK. QC	Receive and review e-mails from client re material for questioning; Meet with R. Quinlan to review preparation for questioning; [REDACTED]	0.30	157.50
11/28/18	DARREN R. BIEGANEK. QC	[REDACTED] Receive signed orders re November 21st appearance; Receive and review Roman affidavit - Dec 5. 2017;	0.60 (0.30 only)	157.50
11/28/18	RYAN QUINLAN	Reviewing new 726 Application and Affidavit; Drafting memo to D. Bieganek regarding new 726 Affidavit; Reviewing file and documents from 726 for preparation for Questioning; [REDACTED]	3.40 (3.10 only)	1,116.00
11/29/18	DARREN R. BIEGANEK. QC	Letter to Justice Hillier enclosing form of order from November 21;	0.10	52.50
11/30/18	DARREN R. BIEGANEK. QC	Receive, review and reply to series of e-mails re pending application; Review material for questioning preparation;	1.10	577.50
11/30/18	DARREN R. BIEGANEK. QC	Prepare for questioning of P. McCracken and B. Roman;	3.20	1,680.00
12/01/18	DARREN R. BIEGANEK. QC	Continue questioning preparation;	4.50	2,362.50
12/02/18	DARREN R. BIEGANEK. QC	Receive and review e-mail exchange between C. Nicholson and C. Russell; Reply to some e-mails; Continue with review of Roman evidence and preparation for questioning;	6.50	3,412.50
12/03/18	DARREN R. BIEGANEK. QC	Receive, review and reply to e-mails from various counsel re questioning and further document requests;	0.50	262.50
12/03/18	DARREN R. BIEGANEK. QC	Receive, review and reply to number of e-mails on questioning and so forth; Review application preparation with R. Quinlan; Continue questioning preparation;	1.50	787.50
12/04/18	RYAN QUINLAN	[REDACTED] Telephone call with Monitor; E-mail correspondence with Monitor; [REDACTED] [REDACTED] Researching law regarding common law ultra vires corporation principles in Alberta;	5.30 (2.20 only)	792.00

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
12/04/18	DARREN R. BIEGANEK. QC	Continue questioning preparation; Attend as counsel for Monitor at questioning of P. McCracken;	9.40	4,935.00
12/04/18	DARREN R. BIEGANEK. QC	Continued questioning preparation;	1.20	630.00
12/05/18	DARREN R. BIEGANEK. QC	Prepare for questioning; Attend as counsel on questioning of P. McCracken;	9.90	5,197.50
12/05/18	RYAN QUINLAN	Locating documents for Questioning of P. McCracken; Telephone call with Monitor: E-mail correspondence with Monitor; Conference with D. BieganeK regarding Questioning of P. McCracken and B. Roman;	1.70	812.00
12/05/18	ZACHARY SOPROVICH	Review law and provide opinion re: validity of transaction contrary to Unanimous Shareholders Agreement;	0.90	198.00
12/06/18	BRAD ANGOVE	Receive initial instructions for research re seeking a remedy while in violation of an order or while in contempt;	0.10	20.00
12/06/18	BRAD ANGOVE	Receive initial instructions for research re transfer of property on 726 matter;	0.10	20.00
12/06/18	DARREN R. BIEGANEK. QC	Continue preparation for questioning of B. Roman; Attend as counsel on questioning of B. Roman; Follow up meeting with counsel: Engage in preliminary resolution discussions;	5.50	2,887.50
12/06/18	RYAN QUINLAN	[REDACTED] Researching law regarding ultra vires corporation principles;	1.60 (1.00 only)	360.00
12/06/18	ZACHARY SOPROVICH	Reviewed case law for brief and prepared memo re: enforceability of transaction not adhering to corporate bylaws or USA;	1.40	308.00
12/07/18	ZACHARY SOPROVICH	Reviewed case law for brief and prepared memo re: enforceability of transaction not adhering to corporate bylaws or USA;	1.90	418.00
12/07/18	DARREN R. BIEGANEK. QC	Receive, review and reply to e-mail from C. Nicholson;	0.30	157.50
12/07/18	DARREN R. BIEGANEK. QC	[REDACTED] Discuss response to C. Nicholson with the monitor: Revise response to Ms. Nicholson;	0.70 (0.50 only)	262.50
12/07/18	DARREN R. BIEGANEK. QC	Revise and send e-mail to C. Nicholson;	0.50	262.50
12/07/18	RYAN QUINLAN	[REDACTED] E-mail correspondence with Monitor regarding various issues; Telephone call with Monitor; Researching law regarding ultra vires corporation principles; Drafting brief for January 2019 hearing;	3.60 (2.80 only)	1,008.00

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
12/09/18	BRAD ANGOVE	Research re time of transfer of property on conditional sale agreements; Research re inability to seek relief from court when in violation of court order;	1.70	340.00
12/10/18	DARREN R. BIEGANEK. QC	Receive and review e-mail exchanges with counsel re terms of latest order; Receive and review e-mails from C. Nicholson regarding ownership claims; Review file material; Draft reply; Receive transcripts; Instructions to R. Quinlan;	0.50	262.50
12/10/18	DARREN R. BIEGANEK. QC	Revise draft of e-mail to C. Nicholson;	0.30	157.50
12/10/18	DARREN R. BIEGANEK. QC	Receive and review e-mail from C. Nicholson;	0.20	105.00
12/10/18	ZACHARY SOPROVICH	Reviewed case law for brief and prepared memo re: whether court has discretion to uphold transactions despite indoor management rule applying;	1.20	264.00
12/10/18	BRAD ANGOVE	Further research re time of transfer of property in conditional sale; Draft memo re time of transfer of property in conditional sale; Further research re availability of relief from court when in violation of court order;	3.20	640.00
12/10/18	RYAN QUINLAN	[REDACTED] [REDACTED] [REDACTED] Researching law regarding ultra vires corporation principles; Drafting brief for January 2019 hearing; Reviewing B. Roman Questioning transcript for brief writing purposes;	9.90 <u>(8.80 only)</u>	3,168.00
12/11/18	DARREN R. BIEGANEK. QC	Receive, review and reply to e-mail from C. Nicholson re request for time before the court [REDACTED] [REDACTED], Receive and review answers to undertakings from Roman questioning;	0.70 <u>(0.50 only)</u>	262.50
12/11/18	BRAD ANGOVE	Consult with R. Quinlan re research and brief contents;	0.20	40.00
12/11/18	RYAN QUINLAN	[REDACTED] [REDACTED] Researching law regarding ultra vires corporation principles; Drafting brief for January 2019 hearing; Reviewing P. McCracken Questioning transcript and Roman undertaking responses for brief writing purposes;	7.20 <u>(6.70 only)</u>	2,412.00
12/12/18	DARREN R. BIEGANEK. QC	Review status of brief with R. Quinlan; E-mail to McCracken counsel requesting undertakings; E-mail to Court coordinator re status of brief	0.40	210.00

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
12/12/18	DARREN R. BIEGANEK. QC	Review exhibits; Revise e-mail to all counsel re same	0.20	105.00
12/11/18	BRAD ANGOVE	Review brief;	2.70	540.00
12/12/18	RYAN QUINLAN	 E-mail correspondence with Monitor regarding various issues; Telephone calls with Monitor; Drafting brief for January 2019 hearing;	7.00 (6.60 only)	2,376.00
12/12/18	DARREN R. BIEGANEK. QC	Receive brief status update from associate;	0.20	105.00
12/13/18	DARREN R. BIEGANEK. QC	Receive and review answers to undertakings from McCracken; E-mail to C. Russell; Letter to counsel for McCracken to request additional undertakings;	0.60	315.00
12/13/18	BRAD ANGOVE	Consult with M. Qu re exhibit inclusions for brief; Review brief and exhibits	1.80	360.00
12/13/18	BRAD ANGOVE	Receive initial instructions re additional research;	0.20	40.00
12/13/18	DARREN R. BIEGANEK. QC	Drafting and revising brief;	6.30	3,307.50
12/13/18	BRAD ANGOVE	Research re accessions, priorities, and ordinary course exception;	2.30	460.00
12/14/18	BRAD ANGOVE	Research re accessions, priorities, and ordinary course exception;	1.60	320.00
12/14/18	DARREN R. BIEGANEK. QC	Receive and review e-mail from C. Nicholson; Forward to C. Russell;	0.20	105.00
12/14/18	BRAD ANGOVE	Research re accessions, priorities, and ordinary course exception;	1.10	220.00
12/14/18	BRAD ANGOVE	Further research re accession, knowledge for the purpose of section 38 of the PPSA, ordinary course of business exception, etc;	4.10	820.00
12/14/18	DARREN R. BIEGANEK. QC	Draft revise and edit brief; Review exhibits, transcripts and documents; Instructions to assistant; E-mail to parties wishing to receive material; Call with Court coordinator; Finalize and sign brief;	5.10	2,677.50
12/15/18	BRAD ANGOVE	Review and Assemble book of authorities for brief;	0.70	140.00
12/21/18	RYAN QUINLAN	E-mail correspondence with client; Reviewing brief of 726;	0.40	144.00
12/27/18	RYAN QUINLAN	Reviewing briefs of 726, CWB, Sand Tiger; Reviewing authorities of 726;	3.10	1,116.00
01/02/19	DARREN R. BIEGANEK, QC	Review briefs; Outline reply; Start drafting reply;	2.00	1,050.00

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
01/02/19	RYAN QUINLAN	Researching law regarding issues raised by 726 in its brief; Drafting memo regarding response to 726 brief; E-mail correspondence with Monitor; Telephone call with Monitor; Conference with D. Bieganeck regarding response brief;	4.10	1,537.50
01/03/19	DARREN R. BIEGANEK, QC	Draft reply brief; Edit same; Review cases; Finalize brief; Submit to court;	4.50	2,362.50
01/06/19	DARREN R. BIEGANEK, QC	Review cases and prepare for two day hearing; Review Order re Weslease decision;	2.50 (2.10 only)	1,102.50
01/07/19	DARREN R. BIEGANEK, QC	Telephone conference call with M. McCulloch and R. Quinlan to review matter and discuss outstanding issues and approaches;	0.90	0.00
01/08/19	RYAN QUINLAN	Drafting orders for January 10 hearing; [REDACTED] E-mail correspondence with Monitor; Preparing for January 10 hearing;	1.90 (1.20 only)	450.00
01/09/19	DARREN R. BIEGANEK, QC	Preparation for application;	7.00	3,675.00
01/09/19	RYAN QUINLAN	Revising Orders for January 10-11 hearing; Preparing submissions for January 10-11 hearing; [REDACTED]	5.90 (4.60 only)	1,725.00
01/10/19	DARREN R. BIEGANEK, QC	Finalize preparation for 726 Applications; Attend as counsel on sale application and other matters including adjournment request by 726; Adjournment denied; Proceed with Sand Tiger matter; Decision reserved;	9.80	5,145.00
01/10/19	RYAN QUINLAN	Preparing submissions for January 10-11 hearing; Attending January 10-11 hearing; Reviewing transcript for references to key documents;	9.80	3,675.00
01/11/19	DARREN R. BIEGANEK, QC	Receive and review further late filed material; Attend court to continue arguments on 726 matter;	4.60	2,415.00
01/11/19	BRAD ANGOVE	Attend in Chambers re 726 application;	1.20	0.00
01/11/19	RYAN QUINLAN	Attending January 10-11 2019 hearing; E-mail correspondence with C. Russell; E-mail correspondence with Monitor;	5.90	2,212.50
01/13/19	RYAN QUINLAN	E-mail correspondence with Monitor; E-mail correspondence with C. Russell; Drafting Order from January 10-11, 2019 hearing; [REDACTED]	1.10	412.50
01/14/19	DARREN R. BIEGANEK, QC	Review file re updates arising from application;	0.30	157.50

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
01/14/19	DARREN R. BIEGANEK, QC	Receive and review e-mail from C. Russell regarding proposed changes to order;	0.20	105.00
01/14/19	RYAN QUINLAN	E-mail correspondence with Monitor; E-mail correspondence with C. Russell; E-mail correspondence with C. Nicholson; E-mail correspondence with Commercial Coordinator; Revising Order from January 11, 2019; Meeting with Monitor and D. Bieganeck;	2.80	1,050.00
01/20/19	RYAN QUINLAN	E-mail correspondence with parties regarding January 10-11 Order;	0.10	37.50
01/22/19	DARREN R. BIEGANEK, QC	[REDACTED] Reply to same; Review form of order received from C. Nicholson; Review edits from associate; Reply to e-mail and form of order;	0.60 (0.40 only)	210.00
01/22/19	RYAN QUINLAN	[REDACTED] E-mail correspondence with C. Russell; Telephone call with C. Russell; [REDACTED] Reviewing and revising JSS version of January 11 form of Order;	2.30 (1.20 only)	450.00
01/23/19	DARREN R. BIEGANEK, QC	Receive and review e-mail from C. Russell confirming agreement with changes to order; Discuss same with R. Quinlan; [REDACTED]	0.20 (0.10 only)	52.50
01/23/19	RYAN QUINLAN	[REDACTED]; Revising January 11 Order; [REDACTED] E-mail correspondence with C. Russell; E-mail correspondence with C. Nicholson; [REDACTED]	2.00 (1.00 only)	375.00
02/07/19	RYAN QUINLAN	[REDACTED] E-mail correspondence with C. Nicholson; [REDACTED]	0.70 (0.20 only)	75.00
02/13/19	RYAN QUINLAN	[REDACTED] E-mail correspondence with C. Russell and C. Nicholson;	0.80 (0.20 only)	75.00
02/14/19	DARREN R. BIEGANEK, QC	Receive and review revised forms of order from counsel for 726; Receive e-mail from C. Russell; Reply to same;	0.20	105.00

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
02/14/19	RYAN QUINLAN	[REDACTED] E-mail correspondence with Monitor; E-mail correspondence with C. Russell and C. Nicholson; Memo to D. Bieganeck regarding January 11 transcript;	0.70 (0.50 only)	187.50
02/15/19	RYAN QUINLAN	[REDACTED] E-mail correspondence with Monitor; E-mail correspondence with C. Russell and C. Nicholson; [REDACTED] E-mail correspondence with Transcript Management Services regarding January 10 transcript; Reviewing research memo of Z. Soprovich;	1.40 (0.70 only)	262.50
02/17/19	RYAN QUINLAN	E-mail correspondence with C. Russell; Reviewing January 10 transcript;	0.20	75.00
02/18/19	RYAN QUINLAN	E-mail correspondence with C. Nicholson;	0.40	150.00
02/19/19	DARREN R. BIEGANEK, QC	Review transcripts re January 10 and 11 proceedings; Review forms of order; Proved comments to associate;	0.50	262.50
02/19/19	DARREN R. BIEGANEK, QC	Receive and review revised for of order from January 10 and 11; Receive confirmation that tax sale not proceeding;	0.20	105.00
02/19/19	DARREN R. BIEGANEK, QC	Receive and review 726 additional brief;	0.40	210.00
02/19/19	RYAN QUINLAN	Telephone call with Monitor; E-mail correspondence with Monitor; E-mail correspondence with C. Russell; Revising January 10-11 orders; E-mail correspondence with C. Russell [REDACTED]; Reviewing Supplemental brief of 726;	3.30 (3.00 only)	1,125.00
02/20/19	RYAN QUINLAN	E-mail correspondence with C. Russell; [REDACTED]; Drafting response brief for March 14 hearing;	2.10 (1.40 only)	525.00
02/21/19	RYAN QUINLAN	E-mail correspondence with client; E-mail correspondence with C. Nicholson; E-mail correspondence with C. Russell; Drafting Reply brief for March 14 hearing;	3.40	1,275.00
02/22/19	DARREN R. BIEGANEK, QC	Review revised forms of order; Consultation with associate re reply brief;	0.10	52.50
02/22/19	RYAN QUINLAN	Researching law regarding "ordinary course of business" and "knowledge" under PPSA; E-mail correspondence with Monitor; Drafting brief for March 14 hearing; E-mail correspondence with C. Russell;	3.60	1,350.00

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
02/23/19	RYAN QUINLAN	E-mail correspondence with C. Russell; Drafting brief for March 14 hearing;	0.70	262.50
02/24/19	DARREN R. BIEGANEK, QC	Receive and review e-mail from C. Russell re order approval;	0.10	52.50
02/24/19	RYAN QUINLAN	Researching law regarding "ordinary course of business" under PPSA;	0.90	337.50
02/25/19	RYAN QUINLAN	[REDACTED] Drafting brief for March 14 hearing; [REDACTED]	4.60 (4.30 only)	1,612.50
02/26/19	RYAN QUINLAN	Drafting brief March 14 hearing [REDACTED] [REDACTED] E-mail correspondence with C. Nicholson; [REDACTED]	2.30 (1.20 only)	450.00
02/27/19	DARREN R. BIEGANEK, QC	Revise draft of reply brief;	1.40	735.00
02/27/19	RYAN QUINLAN	Revising brief for March 14 hearing; [REDACTED] [REDACTED] drafting letter to Court;	2.00 (1.20 only)	450.00
02/28/19	DARREN R. BIEGANEK, QC	Receive and review CWB Supplemental brief;	0.40	210.00
02/28/19	RYAN QUINLAN	Revising brief for March 14 hearing; Revising RFP document; E-mail correspondence with Monitor; Drafting letter to Court; Telephone calls with Monitor (x3); Reviewing CWB supplemental brief; [REDACTED]	4.10 (2.80 only)	1,050.00
03/14/19	DARREN R. BIEGANEK, QC	Attend as counsel on day 1 of continued application re 726;	6.50	3,412.50
03/14/19	RYAN QUINLAN	Obtaining documents for 726 priority argument; Attending Court for 726 priority hearing; Telephone call with Monitor;	7.20	2,772.00
03/15/19	DARREN R. BIEGANEK, QC	Prepare for and attend as counsel on continuation of application re 726; Decision reserved;	8.00	4,200.00
03/15/19	RYAN QUINLAN	Telephone call with Monitor; Obtaining documents for 726 priority argument; Attending Court for 726 priority hearing; Drafting summary of PPR registration requested by Justice Hillier;	8.20	3,157.00
03/21/19	RYAN QUINLAN	[REDACTED] Drafting summary of PPR registration for Justice Hillier;	1.90 (1.40 only)	539.00
03/22/19	RYAN QUINLAN	Drafting summary of PPR registration requested by Justice Hillier; [REDACTED]	1.50 (1.30 only)	500.50

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
03/25/19	RYAN QUINLAN	Drafting letter to Justice Hillier;	0.30	115.50
03/26/19	DARREN R. BIEGANEK, QC	Review draft letter to court re PPR searches; E-mail to associate with comments;	0.20	105.00
03/26/19	RYAN QUINLAN	Revising letter to Justice Hillier; [REDACTED] [REDACTED]	0.60 (0.20 only)	77.00
03/27/19	RYAN QUINLAN	E-mail correspondence with C. Russell and C. Nicholson; [REDACTED]	0.50 (0.40 only)	154.00
04/03/19	DARREN R. BIEGANEK, QC	Receive and review e-mails to and from C. Nicholson regarding PPR schedules;	0.20	105.00
04/03/19	RYAN QUINLAN	E-mail correspondence with C. Nicholson; Reviewing and revising summary of PPR registrations; Telephone call to C. Nicholson;	0.90	346.50
04/04/19	RYAN QUINLAN	Telephone call with C. Nicholson; E-mail correspondence with C. Nicholson;	0.20	77.00
04/05/19	BRAD ANGOVE	Review and revise correspondence to Justice Hillier;	0.30	70.50
04/05/19	RYAN QUINLAN	E-mail correspondence with Justice Hillier's assistant; Reviewing 726 proposed changes to summary of LP PPR registrations; Revising summary of LP PPR registrations; Revising letter to Justice Hillier; E-mail correspondence with D. Bieganeck; E-mail correspondence with C. Nicholson;	2.40	924.00
04/08/19	DARREN R. BIEGANEK, QC	Receive and review e-mail from counsel for CWB re response from counsel for 726 on PPR matters; Receive reply from associate;	0.20	105.00
04/08/19	RYAN QUINLAN	E-mail correspondence with C. Russell;	0.30	115.50
04/15/19	RYAN QUINLAN	Revising letter to Justice Hillier; Revising summary of PPR registrations; E-mail correspondence with C. Nicholson; E-mail correspondence with C. Russell;	1.80	693.00
04/16/19	DARREN R. BIEGANEK, QC	Receive and review e-mail from associate and C. Russell re PPR analysis;	0.20	105.00
04/16/19	RYAN QUINLAN	E-mail correspondence with C. Russell; [REDACTED] [REDACTED] [REDACTED]	0.70 (0.10 only)	38.50
04/17/19	RYAN QUINLAN	[REDACTED] E-mail correspondence with C. Nicholson; [REDACTED] [REDACTED]	0.70 (0.30 only)	115.50

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
04/18/19	RYAN QUINLAN	Revising cover letter to Justice Hillier and Summary of PPR registrations; Telephone call with C. Russell; E-mail correspondence with C. Russell; E-mail correspondence with Z. Han; E-mail correspondence with S. Delblanc;	1.40	539.00
04/18/19	DARREN R. BIEGANEK, QC	Review suggested changes on documents proposed by C. Nicholson;	0.20	105.00
05/14/19	DARREN R. BIEGANEK, QC	Receive reasons for decision of Justice Hillier; Report to client;	0.20	105.00
05/14/19	RYAN QUINLAN	Conference call with client regarding Judgment of issue and next tasks in estate; [REDACTED] Reviewing decision of Justice Hillier on 726 issues;	2.30 (1.50 only)	577.50
05/15/19	RYAN QUINLAN	Email correspondence with Monitor; Updating list of items for next application; Drafting order from justice Hillier's reasons on 726 issues;	1.30	500.50
05/17/19	RYAN QUINLAN	Reviewing alleged missing serial numbers in partnership PPR registrations; Drafting order arising from 726 application; Email correspondence with Monitor; [REDACTED] [REDACTED] [REDACTED]	3.10 (2.30 only)	885.50
05/21/19	DARREN R. BIEGANEK, QC	Receive and review e-mail from R. Quinlan re order status and next steps; [REDACTED]	0.10	52.50
05/21/19	RYAN QUINLAN	[REDACTED] [REDACTED] [REDACTED] Revising order arising from 726 application;	2.10 (0.70 only)	269.50
05/28/19	DARREN R. BIEGANEK, QC	Review 726 decision; Review draft order; Comments to associate;	1.10	577.50
05/29/19	RYAN QUINLAN	Email correspondence with C. Nicholson; Email correspondence with C. Russell; Revising Order for priority for camp assets; [REDACTED] [REDACTED] [REDACTED]	1.40 (0.80 only)	308.00
06/11/19	DARREN R. BIEGANEK, QC	Review 726 situation with R. Quinlan; Plan for call with D. McAllister;	0.20	105.00
06/11/19	DARREN R. BIEGANEK, QC	Meeting with R. Quinlan to review matter, discuss issues re CWB e-mail and prepare for discussions with counsel for 726;	0.60	315.00

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
06/11/19	DARREN R. BIEGANEK, QC	Telephone call with D. McAllister regarding 726 issues and possible resolution; Report to client;	0.40	0.00
06/11/19	RYAN QUINLAN	Email correspondence with Monitor; Email correspondence with D. McAllister; [REDACTED] Email correspondence with C. Nicholson; Email correspondence with C. Russell; Telephone call with D. McAllister; Conference with D. BieganeK regarding possible sale of 726 assets and costs award; [REDACTED] Calculating costs claim;	1.8 (1.50 only)	577.50
06/12/19	DARREN R. BIEGANEK, QC	Receive, review and reply to e-mail from counsel for 726 regarding order;	0.20	105.00
06/12/19	DARREN R. BIEGANEK, QC	Telephone call with counsel for 726 re terms of order; discuss same with R. Quinlan; E-mail to client and bank counsel re developments;	0.50	262.50
06/12/19	RYAN QUINLAN	Correspondence with C. Nicholson; Conference with D. BieganeK regarding changes to Contest Camp Assets Order; E-mail correspondence with Monitor;	0.30	115.50
06/13/19	DARREN R. BIEGANEK, QC	Receive and review e-mail and revised order from C. Nicholson;	0.20	105.00
06/13/19	DARREN R. BIEGANEK, QC	Receive, review and reply to e-mail from C. Russell re form of order;	0.20	105.00
06/13/19	RYAN QUINLAN	Conference call with Monitor and CWB; E-mail correspondence with C. Nicholson; Revising Contested Camp Assets Order; E-mail correspondence with client; E-mail correspondence with C. Russell; [REDACTED]	2.50 (1.20 only)	462.00
06/14/19	RYAN QUINLAN	Revising Contested Camp Assets Order; E-mail correspondence with C. Nicholson; E-mail correspondence with Monitor; E-mail correspondence with C. Russell;	0.40	154.00
06/16/19	RYAN QUINLAN	E-mail correspondence with C. Russell;	0.10	38.50
06/18/19	RYAN QUINLAN	[REDACTED] [REDACTED] E-mail correspondence with C. Nicholson; E-mail correspondence with C. Russell;	3.80 (0.30 only)	115.50
06/20/19	RYAN QUINLAN	E-mail correspondence with Z. Han;	0.10	38.50
06/21/19	RYAN QUINLAN	E-mail correspondence with Z. Han; Revising Contested Camp Assets Order; E-mail correspondence with C. Russell;	0.30	115.50

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
06/24/19	DARREN R. BIEGANEK, QC	Receive and review e-mail from opposing counsel enclosing signed order;	0.10	52.50
06/25/19	RYAN QUINLAN	E-mail correspondence with Monitor; [REDACTED]	0.30	0.00
07/09/19	RYAN QUINLAN	[REDACTED] E-mail correspondence with Monitor; Telephone call with D. McAllister; [REDACTED] E-mail correspondence with C. Russell; E-mail correspondence with C. Nicholson; [REDACTED] Drafting letter to Justice Hillier;	2.70 (2.00 only)	770.00
07/12/19	RYAN QUINLAN	Telephone call with D. McAllister; [REDACTED] Revising letter to Justice Hillier; E-mail correspondence with D. McAllister; E-mail correspondence with CWB;	0.80 (0.40 only)	154.00
08/26/19	RYAN QUINLAN	Telephone call with C. Russell; Email correspondence with client; Email correspondence with C. Russell; [REDACTED] Email correspondence with C. Nicholson; Drafting letter to court regarding 726 costs issue;	1.40 (1.20 only)	462.00
08/30/19	RYAN QUINLAN	[REDACTED] E-mail correspondence with client; E-mail correspondence with C. Russell; E-mail correspondence with C. Nicholson; E-mail correspondence with court coordinator; [REDACTED]	1.40 (0.80 only)	308.00
08/30/19	DARREN R. BIEGANEK, QC	Receive and review e-mails from court coordinator and counsel for CWB re cost issues and application timing; [REDACTED]	0.20 (0.10 only)	56.50
09/24/19	RYAN QUINLAN	[REDACTED] E-mail correspondence with C. Russell; Researching law regarding solicitor-client costs, enhanced costs, partial indemnity costs and costs in CCAA proceedings;	2.30 (2.00 only)	770.00
10/03/19	RYAN QUINLAN	[REDACTED] Drafting 726 costs brief; Researching costs cases for inclusion in brief; [REDACTED]	3.30 (3.00 only)	1,155.00
10/04/19	RYAN QUINLAN	[REDACTED] Drafting 726 costs brief; Reviewing former reports, applications and orders to create timeline for costs brief; [REDACTED]	3.20 (2.90 only)	1,116.50
10/07/19	RYAN QUINLAN	[REDACTED] Drafting 726 costs brief; Reviewing prior documents to make timeline for costs brief; [REDACTED]	4.00 (3.50 only)	1,347.50

DATE	INDIVIDUAL	DESCRIPTION	HOURS	AMOUNT
10/08/19	RYAN QUINLAN	[REDACTED] ; Drafting 7216 costs brief;	2.10 (1.00 only)	385.00
10/09/19	RYAN QUINLAN	[REDACTED] Drafting 726 costs brief;	2.80 (2.20 only)	847.00
10/10/19	RYAN QUINLAN	[REDACTED] Revising Bill of Costs; Reviewing Monitor's professional costs; Revising 726 costs brief	2.40 (2.20 only)	847.00
TOTAL FEES:				\$145,462.50

Taxable Disbursements:

DESCRIPTION	AMOUNT
Sharon Hayes - Swann Hallberg Court Reporter - Dec: 6, 2018 - Barry Roman	\$695.75
Briana Nicoll - Swann Hallberg Court Reporter - December 4, 2018 - Paul McCracken	\$1,077.25
For the Record - Transcripts	\$709.78
For the Record -- Transcripts	\$318.74
PPSA Search	\$528.00
Total Taxable Disbursements:	\$3,329.52

Non-Taxable Disbursements:

DESCRIPTION	AMOUNT
	\$0.00
Total Non-Taxable Disbursements:	\$0.00

Other Charges:

DESCRIPTION	AMOUNT
Photocopy & Printing Charges (20595 pages @ \$0.15/page)	\$3,089.25
eCarswell Research	\$418.96
Total Other Charges:	\$3,508.21

GST:

(a)	Amount claimed on net total fees 5%:	\$7,273.13
(b)	Amount claimed on taxable disbursements:	\$166.48
(c)	Amount claimed on other charges:	\$175.41
TOTAL GST:		\$7,615.02

By making the above claim for an additional amount on account of goods and services tax, the party entitled to the costs award warrants that it is not entitled under the *Excise Tax Act* (Canada) to a refund or rebate of any goods and services tax paid.

Total amount claimed:

Fees:	\$145,462.50
Disbursements and Other Charges:	\$6,837.73
GST:	\$7,615.02
TOTAL:	\$159,915.25

Amount allowed by assessment officer:

Fees:	
Disbursements and Other Charges:	
GST:	
TOTAL:	

Person responsible for preparation of this Bill of Costs:

DUNCAN CRAIG LLP

Darren Bieganek, Q.C. and Ryan F. T. Quinlan
Solicitors for the Monitor, Ernst & Young Inc.

CERTIFICATE OF ASSESSMENT OFFICER:

I, _____, certify the following amount(s) that is (are) to be paid

By _____: \$ _____

To: _____ (name of party or parties to receive the costs awarded).

I also certify the following special circumstance(s) and the amount to be paid by each party with respect to the special circumstance(s):

Special Circumstances

DESCRIPTION	AMOUNT TO BE PAID
	\$
	\$
	\$
	\$

Dated: _____

Name of Assessment Officer: _____

Schedule H

THIS AGREEMENT DATED EFFECTIVE THE ____ DAY OF SEPTEMBER 2019

BETWEEN:

**GREAT WHITE SAND TIGER LODGING LTD.
("Sand Tiger")**

OF THE FIRST PART

-and-

**CANADIAN WESTERN BANK
("CWB")**

OF THE SECOND PART

-and-

**ERNST & YOUNG INC. IN ITS CAPACITY AS THE COURT APPOINTED MONITOR
OF 667402 ALBERTA LTD., 18512398 ALBERTA LTD., 816956 ALBERTA LTD.,
1371047 ALBERTA LTD., 1919209 ALBERTA LTD. AND CANADA NORTH GROUP
LP HOLDINGS LTD.
("E&Y")**

OF THE THIRD PART

SETTLEMENT AGREEMENT

WHEREAS Canada North Camps Inc. (now known as 1851239 Alberta Ltd.) and some of its affiliates, including 1371047 Alberta Ltd. (collectively, "CNC") filed for protection under the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended.

AND WHEREAS E&Y was appointed Monitor of CNC by order of the Alberta Court of Queen's Bench (the "Court") in Action No. 1703 12327;

AND WHEREAS Sand Tiger and CWB are creditors with claims against the assets of CNC;

AND WHEREAS attempts at reorganizing CNC's affairs collapsed and E&Y is proceeding to liquidate the assets of CNC;

AND WHEREAS Sand Tiger, CWB and E&Y were parties to an application before the Court heard on January 10, 11 and March 14 and 15, 2019 (the “**Application**”), with respect, *inter alia*, to the priority of Sand Tiger and CWB’s competing claims to security over certain chattels of Sand Tiger (the “**Small Wares**”) located in Sand Tiger’s dorms (the “**Dorms**”) that were in the possession of CNC at its camp at Bonnyville, Alberta, which Small Wares are listed at Schedule “A” hereto;

AND WHEREAS the Court held on May 14, 2019 that CWB has a perfected security interest over the Small Wares in priority to Sand Tiger’s interest therein;

AND WHEREAS the parties hereto wish to settle the issue of the costs of the Application and CWB’s prior security interest in the Small Wares

NOW THEREFORE WITNESS THAT in consideration of the mutual covenants set out below, the receipt and sufficiency of which is hereby acknowledged, the parties agree as follows:

- 1 The terms of the preamble hereof and Schedule “A” hereto form part of this Agreement and are incorporated herein;.
- 2 Sand Tiger shall pay the sum of \$8,000.00 (the “**Settlement Funds**”), comprised as follows:
 - a. \$5,500.00 to CWB for its costs of the Application;
 - b. \$2,500.00 for CWB’s full waiver and release of its security interest in the Small Wares and any other property of Sand Tiger that may be located in the Dorms.
- 3 For greater clarity, E&Y is waiving its claim to costs of the Application as against Sand Tiger.
- 4 Upon payment of the Settlement Funds by Sand Tiger, neither the Monitor nor CWB shall have any further claim against Sand Tiger for costs of the Application.
- 5 Upon payment of the Settlement Funds by Sand Tiger, CWB shall have no further claim to security over the Small Wares.

- 6 The parties agree that they will execute such further documents and undertake such further acts as may be necessary or required to give full force and effect to this settlement.
- 7 This Settlement Agreement may be executed in separate counterparts, each of which when so executed shall be deemed to be an original and such counterparts together shall constitute one and the same instrument. The exchange of copies of this Settlement Agreement and of the signature pages by facsimile transmission, by electronic mail in portable document format (.PDF) or by any other means shall constitute effective execution and delivery of this Settlement Agreement to the parties and may be used in lieu of the original document for all purposes.
- 8 **The parties acknowledge that** by executing this Settlement Agreement, they are confirming having had the opportunity to read and consider the terms set out herein and to obtain such advice as they considered advisable, including independent legal advice.

IN WITNESS WHEREOF the Parties have executed this agreement as of the day and year first above written.

GREAT WHITE SAND TIGER LODGING LTD.

Per: _____

CANADIAN WESTERN BANK

Per: _____

**ERNST & YOUNG INC. IN ITS CAPACITY AS THE
COURT APPOINTED MONITOR OF 667402
ALBERTA LTD., 18512398 ALBERTA LTD., 816956
ALBERTA LTD., 1371047 ALBERTA LTD., 1919209
ALBERTA LTD. AND CANADA NORTH GROUP LP
HOLDINGS LTD.**

Per: _____

SCHEDULE "A"
LIST OF SMALL WARES

Washers:	16
Dryers:	12
Mattresses:	128
TVs:	38
Chairs:	128

- 6 The parties agree that they will execute such further documents and undertake such further acts as may be necessary or required to give full force and effect to this settlement.
- 7 This Settlement Agreement may be executed in separate counterparts, each of which when so executed shall be deemed to be an original and such counterparts together shall constitute one and the same instrument. The exchange of copies of this Settlement Agreement and of the signature pages by facsimile transmission, by electronic mail in portable document format (.PDF) or by any other means shall constitute effective execution and delivery of this Settlement Agreement to the parties and may be used in lieu of the original document for all purposes.
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IN WITNESS WHEREOF the Parties have executed this agreement as of the day and year first above written.

GREAT WHITE SAND TIGER LODGING LTD.

Per: _____

CANADIAN WESTERN BANK

Per: _____

**ERNST & YOUNG INC. IN ITS CAPACITY AS THE
COURT APPOINTED MONITOR OF 667402
ALBERTA LTD., 18512398 ALBERTA LTD., 816956
ALBERTA LTD., 1371047 ALBERTA LTD., 1919209
ALBERTA LTD. AND CANADA NORTH GROUP LP
HOLDINGS LTD.**

Per: _____

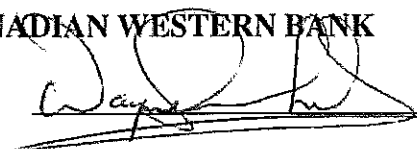
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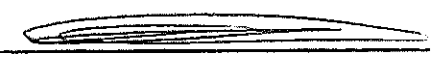
IN WITNESS WHEREOF the Parties have executed this agreement as of the day and year first above written.

GREAT WHITE SAND TIGER LODGING LTD.

Per: _____

CANADIAN WESTERN BANK

Per:  _____
Wayne Horachek
Assistant Vice President
Credit Risk Management


Rod Randall
Assistant Vice President
Credit Risk Management

**ERNST & YOUNG INC. IN ITS CAPACITY AS THE
COURT APPOINTED MONITOR OF 667402
ALBERTA LTD., 18512398 ALBERTA LTD., 816956
ALBERTA LTD., 1371047 ALBERTA LTD., 1919209
ALBERTA LTD. AND CANADA NORTH GROUP LP
HOLDINGS LTD.**

Per: _____