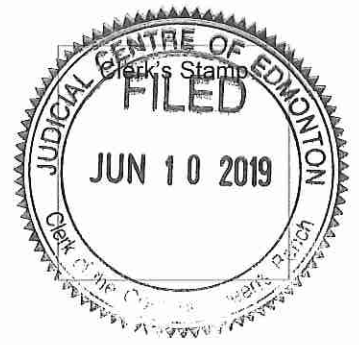




COURT FILE NUMBER 1703 12327
COURT COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE EDMONTON

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 **APPLICATION BY MONITOR FOR EXTENSION OF STAY**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
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File No: 204-196164

NOTICE TO RESPONDENTS

This application is made against you. You are a respondent. You have the right to state your side of this matter before the judge.

To do so, you must be in Court when the application is heard as shown below:

Date: June 18, 2019
Time: 10:00 a.m.
Where: Edmonton Law Courts
1A Sir Winston Churchill Square
Edmonton, AB T5J 0R2

Before Whom: The Honourable Mr. Associate Chief Justice Nielsen on the Commercial List

Go to the end of this document to see what else you can do and when you must do it.

Remedy claimed or sought:

1. An Order:
 - a. declaring service of this Application and its supporting materials good and sufficient, and if necessary, abridging time for notice of this Application to the time actually given;
 - b. extending the stay of proceedings provided in the Initial Order granted July 5, 2017 up to and including December 31, 2019;

- c. amending the Order (Weslease Mortgages) granted on December 20, 2018 to correct a typographic error in one of the legal descriptions included in that Order;
- d. approving the activities of the Monitor as set out in its Twenty-Third Report and the Confidential Supplement; and
- e. providing for such other relief as this Honourable Court deems just.

Grounds for making this application:

2. On July 5, 2017, Canada North Group Inc., Canada North Camps Inc. ("CNC"), Campcorp Structures Ltd. ("Campcorp"), D.J. Catering Ltd. ("DJ"), 816956 Alberta Ltd., and 137 (hereinafter made an application before this Honourable Court requesting certain relief under the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "CCAA") and obtained an initial order (the "Initial Order"), a stay of proceedings ("Stay") against the Applicants for a period of 30 days up to and including August 3, 2017, and the appointment of Ernst & Young Inc. (the "Monitor") as monitor of the Applicants.
3. Since that time, 1919209 Alberta Ltd. ("1919") and Canada North Group LP Holdings Ltd. ("Holdings") have been added as "Applicants" to these proceedings, while Campcorp and DJ have been removed from the proceedings.

Extension of the Stay

4. The Stay has been extended on multiple occasions, and is currently in place up to June 30, 2019.
5. These proceedings are now Court approved and directed liquidating CCAA proceedings.
6. The Monitor, on behalf of the Remaining Applicants, is seeking an extension of that stay of proceedings up to and including December 31, 2019.
7. The Remaining Applicants, through the Monitor, have acted, and are acting, in good faith and with due diligence in respect of these proceedings.
8. Based on information discovered and the work done by the Monitor since the expansion of its powers, and the anticipated work and matters yet to be discovered, completed or resolved, the current stay extension to June 30, 2019 does not provide for sufficient time to address the matters identified to date, realize on the balance of the Remaining Applicants' assets, resolve and determine the allocation of the costs of the CCAA proceedings, distribute funds to creditors, and bring these CCAA proceedings to an end.
9. It is the opinion of the Monitor that it will take until at least December 31, 2019, before most of the substantive matters in these CCAA proceedings can be resolved, and these proceedings can be brought to an end.

Amendment of Prior Order (Weslease Mortgages)

10. In mid-April, 2019, the Monitor's counsel was advised by the Land Titles Office that the form of the Order (Weslease Mortgages) was rejected as there was a typographic error in respect of one of the legal descriptions noted therein. Upon review, the Monitor's counsel determined that the reference to "Block 1" in paragraph 1 of this Order should have referenced "Block 2" in its place.

11. Counsel for the Monitor worked with counsel for Weslease and have drafted an Order Amending the Order (Weslease Mortgages) to address this error, which has been consented to by counsel for Weslease.
12. The Order Amending the Order (Weslease Mortgages) simply amends the applicable legal description. In all other respects, the Order (Weslease Mortgages) shall remain unamended.
13. Such further and other reasons as the Monitor may advise and this Honourable Court may accept.

Material or evidence to be relied on:

14. Twenty-Third Report of the Monitor, filed.
15. The pleadings and proceedings taken in this Action to date.
16. Such further and other materials as previously filed in this matter as counsel may advise and this Honourable Court permits.

Applicable rules:

17. *Alberta Rules of Court*, AR 124/2010, including Rules 1.2, 1.4, 6.1, 6.2, 6.3 and 11.27.

Applicable Acts and regulations:

18. *Judicature Act*, RSA 2000 c. J-2, as amended;
19. *Companies' Creditors Arrangement Act*, RSC 1985, c C-36 including ss. 3, 9, 11, 11.02, and 23.
20. Such further other provisions and statutes as counsel may advise.

Any irregularity complained of or objection relied on:

21. Abridgement of time for service to the time actually given, if necessary.

How the application is proposed to be heard or considered:

22. Before the Honourable Associate Chief Justice Nielsen sitting on the Commercial List.

WARNING

If you do not come to Court either in person or by your lawyer, the Court may give the applicant(s) what they want in your absence. You will be bound by any order that the Court makes. If you want to take part in this application, you or your lawyer must attend in Court on the date and at the time shown at the beginning of the form. If you intend to give evidence in response to the application, you must reply by filing an affidavit or other evidence with the Court and serving a copy of that affidavit or other evidence on the applicant(s) a reasonable time before the application is to be heard or considered.