Clerk's Stamp

FILED DEC 07 2017 JUDICIAL DISTRICT OF EDMONTON Clerk of the Court

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 CANADA NORTH GROUP INC., CANADA NORTH CAMPS INC., CAMPCORP STRUCTURES LTD., D.J. CATERING LTD., 816956 ALBERTA LTD. and 1371047 ALBERTA LTD.
DOCUMENT	**APPLICATION TO INCREASE DEBTOR-IN-POSSESSION FINANCING AND COLLATERAL RELIEF**
ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	Stephanie A. Wanke Oviatt Law #401, 10408 124 Street Edmonton AB T5N 1R5 T 780.809.2219 F 780.669.7215

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:	December 12, 2017
Time:	8:45 a.m.
Where:	Edmonton Law Courts 1A Sir Winston Churchill Square Edmonton, AB T5J 0R2
Before Whom:	The Honourable Justice K.G. Nielsen

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 granting the Applicants an increase of the Interim Debtor In Possession Financing to a maximum of $3,500,000 and Interim Lender's Charge (as defined in the Initial Order granted July 5, 2017 in these proceedings) up to the same amount.

2. A sealing order of the Confidential Supplement to the Seventh Affidavit of Shayne McCracken sworn December 7, 2017.

3. Such other relief as this Honourable Court deems just.

Grounds for making this application:

4. An Initial Order was granted pursuant to *CCAA* on July 5, 2017 (the "**Initial Order**") whereby the Honourable Mr. Justice K.G. Nielsen granted interim financing to the Applicants from Business Development Bank of Canada (the "**Interim Lender**") in the amount of $1,000,000 (the "**Interim Financing**") and the Interim Lender's Charge in the same amount.

5. A further Order was granted on July 27, 2017 whereby the interim financing from the Interim Lender was increased to a maximum of $2,500,000 with a corresponding increase to the Interim Lender's Charge.

6. The Interim Financing to date has permitted the Applicants to continue to operate, including as they are incurring ongoing restructuring expenses.

7. The original projections did not anticipate a further need for Interim Financing, however, wet, soft and slushy road conditions in much of October and November resulted in the start of the busy winter camp season being deferred by a number of weeks.

8. As a result, the Applicants require additional Interim Financing to operate their camps and respond to the demand for services.

9. The revenue from the ongoing work, once received, is projected to exceed the additional costs.

10. The Applicants continue to work diligently in advancing their restricting, including by developing future sales and other opportunities, streamlining and reducing ongoing expenses and working with investors, lenders and potential partners to develop a plan that will maximize value for creditors.

11. No creditor is materially prejudiced by the increase in the Interim Financing or Interim Lender's Charge.

12. Granting the increase in the Interim Financing will allow the Applicants to continue operating and will increase value for stakeholders.

13. The Monitor believes the increase in the Interim Financing is necessary and reasonable.

14. The information in the Confidential Supplement to the Seventh Affidavit of Shayne McCracken is commercially sensitive and ought to be sealed.

Material or evidence to be relied on:

1. Seventh Affidavit of Shayne McCracken sworn December 7, 2017 filed;

2. Confidential Supplement to the Seventh Affidavit of Shayne McCracken sworn December 7, 2017, unfiled;

3. Sixth Report of the Monitor, to be filed.

4. Such further and other materials as previously filed in this matter as counsel may advise and this Honourable Court permits.

Applicable rules:

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

Applicable Acts and regulations:

6. *Judicature Act*, RSA 2000 c. J-2 , as amended;
7. *Companies' Creditors Arrangement Act*, RSC 1985, c C-36 including ss. 9, 11, and 11.2.
8. Such further other provisions and statutes as counsel may advise.

Any irregularity complained of or objection relied on:

9. Abridgement of time for service to the time actually given.

How the application is proposed to be heard or considered:

10. Before a Justice 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.