

COURT FILE NUMBER 1703 12327

COURT COURT OF QUEEN'S BENCH OF ALBERTA

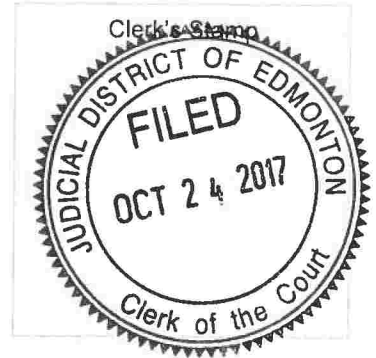
JUDICIAL CENTRE EDMONTON

MATTER 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.

APPLICANTS CANADA NORTH GROUP INC., CANADA NORTH CAMPS INC., CAMPCORP STRUCTURES LTD., D.J. CATERING LTD., 816956 ALBERTA LTD. and 1371047 ALBERTA LTD.

DOCUMENT **APPLICATION FOR SEALING ORDER**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
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NOTICE TO RESPONDENTS: SERVICE LIST

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: **October 25, 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 declaring service of this Application good and sufficient and abridging time for notice of this Application to the time actually given.
2. An Order sealing the Confidential Supplement to the Sixth Affidavit of Shayne McCracken sworn October 24, 2017 (the "**Confidential Affidavit**") until such further Order of this Court.
3. Such further and other relief as counsel may seek and this Honourable Court may permit.

Grounds for making this application:

4. The Confidential Affidavit attaches as exhibits appraisals of certain assets of the Applicants pertinent to the Investment and Sales Solicitation Process (the "**ISSP**") authorized by the Honourable Justice Hillier in his Order for Extension granted September 26, 2017 (the "**Second Extension Order**") and Her Majesty the Queen's in right of Canada's Application for Leave to Appeal filed September 29, 2017 (the "**Application for Leave**").
5. The Applicants seek to rely on the Confidential Affidavit in response to the Application for Leave.
6. Further, it is probable that the Confidential Affidavit will be relied upon in seeking further orders from this Court as the ISSP progresses.
7. The information deposed in the Confidential Affidavit is of a commercially sensitive nature.
8. Publication of the Confidential Affidavit prior to the conclusion of these proceedings could result in seriously compromising the ISSP and the Applicants' ability to propose a Plan of Arrangement to its creditors.
9. A sealing order is necessary to prevent a serious risk to the proper administration of justice and these CCAA proceedings.

10. A sealing order is the least restrictive and prejudicial alternative to prevent risk of compromising these CCAA proceedings and causing serious commercial harm to the Applicants.
11. The significant salutary effects of sealing the Confidential Affidavit, including enabling the Applicants to adequately respond to the Application for Leave and provide evidence in support of further orders with respect to the ISSP outweigh the deleterious effects of the sealing order.
12. It is appropriate in these circumstances to restrict public access to the Confidential Affidavit.

Material or evidence to be relied on:

13. The Initial Order granted July 5, 2017 by the Honourable Justice K.G. Nielsen;
14. The First Extension Order granted July 27, 2017 by the Honourable Justice S.D. Hillier;
15. The Second Extension Order granted September 26, 2017 by the Honourable S.D. Hillier;
16. Confidential Supplement to the Sixth Affidavit of Shayne McCracken, sworn on October 24, 2017, unfiled;
17. Such further and other materials as counsel may advise and this Honourable Court permits.

Applicable rules:

18. *Alberta Rules of Court* AR124/2010, including Rules 1.2, 1.4, and Part 6, Division 4.

Applicable Acts and regulations:

19. *Judicature Act*, RSA 2000 c J-2, as amended.
20. *Companies' Creditors Arrangement Act*, RSC 1985, c C-36, including s. 11.

Any irregularity complained of or objection relied on:

21. Abridgement of time for service, as required.

How the application is proposed to be heard or considered:

22. 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.