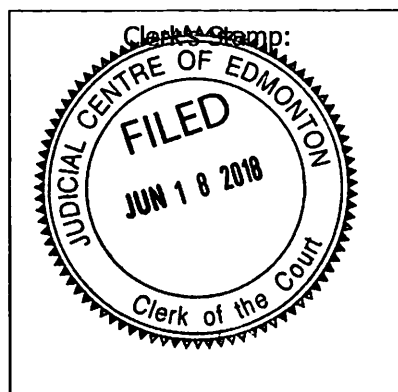


COURT FILE NO. 1703 12327

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

DOCUMENT APPLICATION BY CANADIAN WESTERN BANK

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	McLENNAN ROSS LLP #600 McLennan Ross Building 12220 Stony Plain Road Edmonton, AB T5N 3Y4	Lawyer: Charles P. Russell, Q.C. Telephone: (780) 482-9115 Fax: (780) 733-9757 Email: crussell@mross.com File No.: 165813
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NOTICE TO THE 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:	June 21, 2018
Time:	10:00 a.m.
Where:	Law Courts, 1A Sir Winston Churchill Square, Edmonton, AB T5J 0R2
Before Whom:	The Honourable Mr. 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 abridging the time for notice of this application and deeming service good and sufficient.
2. An Order appointing representative counsel (the "Representative Counsel") to represent the interests of the estate of the Canada North Group, in the appeal by Canada Revenue Agency ("CRA") to be heard October 2, 2018 (the "Appeal").
3. An Order directing CRA to pay the reasonable costs of Representative Counsel in its retainer, on a solicitor and his own client basis, to be assessed in these proceedings.
4. An Order directing Representative Counsel to act as lead respondent in the CRA Appeal.
5. In the alternative, advice and direction as to the manner in which the creditors of the estate who have an economic interest in the payment of costs to be incurred by the respondents in the CRA Appeal, may have input into the determination thereof.
6. Such further and other relief as this Honourable Court may deem fit.

Grounds for making this application:

7. Those creditors with an economic interest in the payment of costs of the respondents on the CRA Appeal, were not represented at the application for leave to appeal the decision of Madam Justice Topolniski from which the Appeal is being taken.
8. The ultimate burden of paying the costs of the respondents in arguing the CRA Appeal, and potentially bearing the burden of a cost award in favour of CRA, may lie with the general body of creditors of the estate.
9. The panel hearing the Appeal may direct payment of costs which must then be borne by the estate, which may have unintended consequences for the creditors of the estate.
10. The creditors are entitled to a voice in determination of how such costs are to be borne, if at all, by the estate.
11. Such further and other grounds as appear at the Motion.

Material or evidence to be relied on:

12. The 5th Affidavit of Jessie Taha.
13. Such further and other evidence as counsel may advise.

Applicable rules:

14. Alberta Rules of Court rules 1.3, 1.4, 3.28 and 3.73.
15. Such further and other statutes and rules as counsel may advise.

Applicable Acts and Regulations:

16. The *Companies' Creditors Arrangement Act*, R.S.C. 1985 c. C-36 as amended.
17. Such further and other acts and regulations as counsel may advise.

Any irregularity complained of or objection relied on:

18. None.

How the application is proposed to be heard or considered:

19. Affidavit evidence and argument.

AFFIDAVIT EVIDENCE IS REQUIRED IF YOU WISH TO OBJECT.

WARNING

If you do not come to Court either in person or by your lawyer, the Court may give the Applicant 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 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 a reasonable time before the application is to be heard or considered.