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DELIVERED BY HAND

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

Attention: The Honorable Justice K. G. Nielsen

Dear Justice Nielsen:

**Re: 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. and 1919209 Alberta Ltd.
Action Number 1703 12327
Application Scheduled on Thursday, June 21, 2018 at 10:00 a.m. before the Honorable Justice K. G. Nielsen (the "Application")**

With respect to the hearing scheduled before Your Lordship on Thursday, June 21, 2018 at 10:00 AM, in Commercial Chambers, please find enclosed the following filed materials:

1. An Application by Staheli Construction Co. Ltd. seeking a Direction that it be permitted to file its Proof of Claim late;
2. Affidavit of Glen Staheli Affirmed on June 15, 2018; and
3. Brief of Argument and Authorities of Staheli Construction Co. Ltd. in support of the above referenced Application and in opposition to the request made to the Monitor and this Honourable Court by Business Development Bank of Canada for a legal fee cost reserve

When we sought permission from the Court to file materials late, we advised the court that our client may bring an Application respecting the distribution of sale proceeds arising from the Sale of the Winterburn Lands (as defined in the enclosed materials) being held in trust by the Monitor. We will not be bringing this Application on Thursday, but are coordinating with the Monitor with the intention of scheduling such Application in the near future.



We thank the Court for its indulgence in allowing the late filing of our materials.

Yours truly,
DLA Piper (Canada) LLP
Per:

A handwritten signature in black ink, appearing to read 'Susy Trace', written over a horizontal line.

Susy Trace
Associate
ST/cop
Encl.

cc: Client via email
Brian Davison, Q.C. via Email
Service List