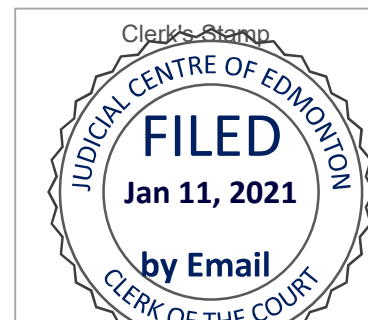


COURT FILE NO. 1703 12327

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 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 A FURTHER EXTENSION OF THE
STAY OF PROCEEDINGS**

ADDRESS FOR
SERVICE AND
CONTACT
INFORMATION OF
PARTY FILING THIS
DOCUMENT

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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: January 20, 2021

Time: 8:45 AM

Where: **BY WEBEX (log in information to be provided)**

Before Whom: The Honourable Associate Chief Justice Nielsen sitting 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) an Order extending the stay of proceedings provided in the Initial Order granted July 5, 2017 to and including April 16, 2021;
 - c) approving the activities of the Monitor as set out in the Monitor's 30th Report; and
 - d) for such further and other relief as this Honourable Court deems just and appropriate in the circumstances.

Grounds for making this application:

- 2) On July 5, 2017, Canada North Group Inc., Canada North Camps Inc., Campcorp Structures Ltd. ("Campcorp"), D.J. Catering Ltd. ("DJ"), 816956 Alberta Ltd., and 1371047 Alberta Ltd. 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 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. and Canada North Group LP Holdings Ltd. have been added as "Applicants" to these proceedings, while Campcorp and DJ have been removed from the proceedings.
- 4) The Stay has been extended on multiple occasions, and is currently in place up to January 31, 2021.
- 5) This matter is now a Court approved and directed liquidating proceeding.
- 6) The Monitor, on behalf of the Remaining Applicants, is seeking an extension of that Stay of proceedings up to and including April 16, 2021. The reasons for the requested extension are set out in the Monitor's 30th Report.
- 7) In the circumstances, an extension of time to April 16, 2021 will afford the Monitor the further and necessary time to address the remaining issues.
- 8) In the circumstances, the Remaining Applicants, through the Monitor, have acted, and are acting, in good faith and with due diligence in respect of these proceedings.
- 9) Such further and other reasons as the Monitor may advise and this Honourable Court may accept.

Material or evidence to be relied on:

- 10) The 30th Report of the Monitor, filed.

- 11) The pleadings and proceedings taken in this Action to date.
- 12) Such further and other materials as previously filed in this matter as counsel may advise and this Honourable Court permits.

Applicable rules:

- 13) *Alberta Rules of Court* AR 124/2010, including Rules 1.2, 1.4, 6.1, 6.2, 6.3 and 9.12 and Division 4 of Part 6.

Applicable Acts and regulations:

- 14) *Judicature Act*, R.S.A. 2000 c. J-2, as amended.
- 15) *Companies' Creditors Arrangement Act*, R.S.C. 1985, c C-36 including ss. 9, 10, 11, 11.02, and 23.
- 16) Such further other provisions and statutes as counsel may advise.

Any irregularity complained of or objection relied on:

- 17) Abridgement of time for service to the time actually given, if necessary.

How the application is proposed to be heard or considered:

- 18) Before the Honourable Associate Chief Justice Nielsen, by way of Webex.

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.