

**IN THE COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE OF CALGARY**

**IN THE MATTER OF THE *COMPANIES' CREDITORS*
ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED**

AND IN THE MATTER OF SHIRE INTERNATIONAL REAL ESTATE INVESTMENTS LTD., SHIRE CAPITAL LTD., HALAMA GARDENS LLC, SHIRE ASSET MANAGEMENT LTD., WINN RIVER RESORT LTD., FORT MCMONEY PROPERTIES II LTD., HALAMA GARDENS LTD., MAPLES AND WHITE SANDS INVESTMENT LTD., FORT MCMONEY PROPERTIES LTD., CHEMAINUS PROPERTIES LTD., SKAHA LAKE DEVELOPMENT LTD., TSEHUM HARBOUR LTD., BEARSPAW AT 144TH AVENUE LTD., BEARSPAW AT 144TH EQUITIES LTD., BEARSPAW AT 144TH BONDS INC., TSEHUM HARBOUR EQUITIES LTD., TSEHUM HARBOUR BONDS LTD. and ORILLIA INVESTMENTS LTD.

Applicants

NOTICE OF MOTION

TAKE NOTICE that an application will be made by Shire International Real Estate Investments Ltd, Shire Capital Ltd., Halama Gardens LLC, Shire Asset Management Ltd., Winn River Resort Ltd., Fort McMoney Properties II Ltd., Halama Gardens Ltd., Maples and White Sands Investment Ltd., Fort McMoney Properties Ltd., Chemainus Properties Ltd., Skaha Lake Development Ltd., Tsehum Harbour Ltd., Bearspaw at 144th Equities Ltd., Bearspaw at 144th Bonds Inc., Tsehum Harbour Equities Ltd., Tsehum Harbour Bonds Ltd. and Orillia Investments Ltd. (the "Applicants" or the "Shire Group") before Madam Justice C.A. Kent in Chambers at the Calgary Courts Centre in the City of Calgary, in the Province of Alberta on Friday, October 2, 2009 at 9:00 a.m., for an Order for the following relief:

1. Directing that the stay of proceedings in the Initial Order in this action be extended until October 8, 2009, or such other date as this Honourable Court may direct;
2. Continuing the requirement in paragraph 9(d) of the Initial Order that all expenses be approved by the Monitor;
3. Abridging time for service of this application, if necessary, and deeming service to be good and sufficient; and

4. Such further and other relief as counsel may advise and this Honourable Court may permit.

AND FURTHER TAKE NOTICE THAT the grounds of this application are as follows:

- (a) Since the Initial Order granted August 10, 2009, the Applicants have exercised due diligence and have taken significant steps to further their restructuring;
- (b) The Applicants expect to be within the cash flow requirements filed with this Court in support of the prior application and expect to have sufficient cash to continue their restructuring until October 8, 2009; and
- (c) The Applicants continue to make good faith efforts to complete a restructuring and deal with stakeholders in a fair and equitable manner.

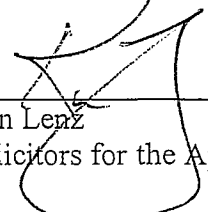
AND FURTHER TAKE NOTICE THAT in support of this application will be read the following:

- (a) The Affidavit of Cleone Couch, filed in support of this motion;
- (b) The Second Report of the Monitor, Ernst & Young Inc., to be filed;
- (c) The pleadings and proceedings filed in this action and in particular, the Affidavit of Cleone Couch sworn September 30, 2009; and
- (d) Such further and other material as counsel may advise and this Honourable Court may permit.

DATED at the City of Calgary, in the Province of Alberta, this 30th day of September, 2009.

BENNETT JONES LLP

Per:


Ken Lenz
Solicitors for the Applicants

TO: Clerk of the Court of Queen's Bench
of Alberta

AND TO: Attached Service List

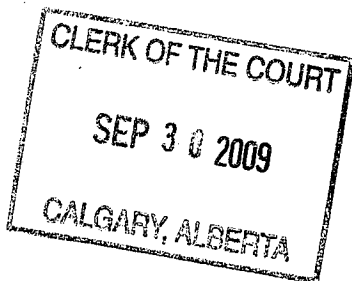
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MANAGEMENT LTD., WINN RIVER RESORT
LTD., FORT MCMONEY PROPERTIES II LTD.,
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DEVELOPMENT LTD., TSEHUM HARBOUR
LTD., BEARSPAW AT 144TH AVENUE LTD.,
BEARSPAW AT 144TH EQUITIES LTD.,
BEARSPAW AT 144TH BONDS INC., TSEHUM
HARBOUR EQUITIES LTD., TSEHUM
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