

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, *THE JUDICATURE ACT*, R.S.A. 2000, c. J-2, AS
AMENDED AND THE *BUSINESS CORPORATIONS ACT*, R.S.A. 2000, c. B-9,
AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT 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., ORILLIA INVESTMENTS LTD.,
0726028 B.C. LTD., 0675916 B.C. LTD. and BOSUN'S HOLDINGS LTD.

NOTICE OF MOTION

TAKE NOTICE that an application will be made by and on behalf of Ernst & Young Inc. (the "**Receiver**"), in its capacity as receiver of the properties of Shire Capital Ltd. and 0726028 B.C. Ltd. (collectively, the "**Debtors**") identified at paragraph two of the Receivership Order issued in the within Action on June 30, 2010 (the "**Receivership Order**"), before the Honourable Justice C.A. Kent the Courts Centre, in the City of Calgary, in the Province of Alberta, on Tuesday, the 5th day of October, 2010 at 1:30 pm for an Order, substantially in the form attached as Schedule "A" hereto (the "**Draft Order**");

1. Declaring that the time for service of this Notice of Motion (the "**Motion**") and the fourth report of the Receiver, dated October 4th, 2010 (the "**Fourth Receiver's Report**") is abridged, that the Motion is properly returnable on October 5, 2010, that service of the Motion and the Fourth Receiver's Report on the persons listed in Schedule "B" to the Motion (the "**Service List**") is good and sufficient and that no persons other than those on the Service List are entitled to service of the Fourth Receiver's Report, the Motion or any order arising there from;

2. Approving the Receiver's Final Statement of Receipt's and Disbursements, as set forth at paragraph eight of the Fourth Receiver's Report;
3. Approving the issued and estimated accounts of the Receiver and the Receiver's legal counsel, as stated at paragraph 15, 16 and Appendix "A" to the Fourth Receiver's Report;
4. Ordering that, upon the closing of the Purchase Agreement (as defined herein), the Receiver shall be discharged as receiver of the OK Falls Property (as that term is defined in Schedule "A" to the Draft Order) and relieved of all further duties and obligations in respect of the OK Falls Property, save and except for that the Receiver shall be authorized and empowered to take any actions that are necessary to conclude the receivership of the OK Falls Property after the Receiver is discharged as receiver of the OK Falls Property;
5. Ordering that, upon the Receiver being discharged as receiver of the OK Falls Property, the Receiver's Charge and the Receiver's Borrowing Charge (as those terms are defined in the Receivership Order) be terminated as against the OK Falls Property;
6. Ordering that, upon the Receiver completing any actions that are necessary to conclude the receivership of the OK Falls Property after the Receiver is discharged as receiver of the OK Falls Property:
 - (a) the Receiver shall forward any remaining funds that the Receiver holds in respect of the OK Falls Property (the "**Remaining Funds**") to Rompsen Investment Corporation ("**Rompsen**"); and
 - (b) Rompsen shall apply the Remaining Funds towards re-payment of the DIP Facility (as that term is defined in the Order made in the within proceedings on January 11, 2010, and amended by the Order made in the within proceedings on September 23, 2010);
7. Declaring that, as of the date of the Fourth Receiver's Report and based on the evidence that is currently before the Court:
 - (a) the Receiver has acted honestly and in good faith, and has dealt with the OK Falls Property in a commercially reasonable manner;

- (b) the actions and conduct of the Receiver are approved and the Receiver has satisfied all of its duties and obligations as receiver of the OK Falls Property;
 - (c) the Receiver shall not be liable for any act or omission including, without limitation, any act or omission pertaining to the discharge of the Receiver's duties as receiver of the OK Falls Property, save and except for liability arising out of fraud, gross negligence or wilful misconduct on the part of the Receiver; and
 - (d) any and all claims arising from, relating to or in connection with the performance of the Receiver's duties and obligations as receiver and manager of the OK Falls Property, save and except for claims based on fraud, gross negligence or wilful misconduct on the part of the Receiver, shall be forever barred and extinguished;
8. Declaring that no action or proceeding arising from, relating to or in connection with the performance of the Receiver's duties and obligations as receiver of the OK Falls Property may be commenced or continued without the prior leave of the Court, on notice to the Receiver and on such terms as the Court may direct;
9. Declaring that any order arising from the Motion shall not affect:
- (a) the authority provided to the Receiver in the Receivership Order to take actions in respect of the Debtors or the Sorrento Property (as that term is defined in Schedule "B" to the Draft Order); or
 - (b) the validity and priority of the Receiver's Charge and the Receiver's Borrowing Charge as against the Sorrento Property;
10. Such further and other relief as counsel may advise and this Honourable Court may allow;
- AND FURTHER TAKE NOTICE** that the grounds for this application are as follows:
11. The Receiver was appointed as receiver of the OK Falls Property and the Sorrento Property pursuant to the Receivership Order;

12. The OK Falls Property is subject to an agreement of purchase and sale, dated July 29, 2010 (the "**Purchase Agreement**") between Rompson Investment Corp. ("**Rompson**") and 0886922 BC Ltd. ("**088 BC**");

13. Rompson has applied for an order to approve the sale of the OK Falls Property to 088 BC pursuant to the Purchase Agreement;

14. In the event that the Purchase Agreement closes, 088 BC will be the owner of the OK Falls Property and can assume the administration and management of the OK Falls Property;

15. It is appropriate for the Receiver to be discharged as receiver of the OK Falls Property upon the closing of the Purchase Agreement and on the terms and conditions sought by the Receiver; and

16. Such further and other grounds as counsel may advise and this Honourable Court may allow;

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

17. The Fourth Report of the Receiver, and all previous reports prepared by the Receiver and filed in the within proceedings;

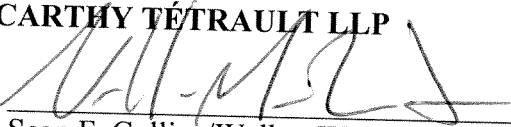
18. The pleadings in the within Action;

19. The *Bankruptcy and Insolvency Act* (Canada) and the *Rules of Court* (Alberta); and

20. Such further and other materials as counsel may advise and this Honourable Court may allow.

DATED at the City of Calgary, in the Province of Alberta, this 4th day of October, 2010,
AND DELIVERED by **McCARTHY TÉTRAULT LLP**, Barristers and Solicitors, Solicitors for
the Applicant herein whose address for service is in care of the said Solicitors at Suite 3300, 421-7th
Avenue S.W., Calgary AB T2P 4K9.

McCARTHY TÉTRAULT LLP

Per: 

Sean F. Collins/Walker W. MacLeod
Solicitors for Ernst & Young Inc.

TO: CLERK OF THE COURT

AND TO: SERVICE LIST (Schedule "B")

SCHEDULE "A"

Action No. 0901-11866

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, *THE JUDICATURE ACT*, R.S.A. 2000, c. J-2, AS
AMENDED AND THE *BUSINESS CORPORATIONS ACT*, R.S.A. 2000, c. B-9,
AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT 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., ORILLIA INVESTMENTS LTD.,
0726028 B.C. LTD., 0675916 B.C. LTD. and BOSUN'S HOLDINGS LTD.

BEFORE THE HONOURABLE MADAM) AT THE CALGARY COURTS CENTER, IN
JUSTICE C.A. KENT IN CHAMBERS) THE CITY OF CALGARY, ON TUESDAY,
) THE 5TH DAY OF OCTOBER, 2010

ORDER

UPON THE APPLICATION of Ernst & Young Inc. (the "**Receiver**"), in its capacity as receiver of the properties of Shire Capital Ltd. and 0726028 B.C. Ltd. (collectively, the "**Debtors**") identified at paragraph two of the Receivership Order issued in the within Action on June 30, 2010 (the "**Receivership Order**"); AND UPON reading the fourth report of the Receiver, dated October 4th, 2010 (the "**Fourth Receiver's Report**"); AND UPON reading the Affidavit of Service of ●, sworn ●, 2010 (the "**Affidavit of Service**"); AND UPON hearing from counsel for the Receiver and counsel for any other persons present; **IT IS HEREBY ORDERED AND DECLARED THAT:**

1. The time for service of the Notice of Motion, dated October 4th, 2010 (the "**Motion**") and the Fourth Receiver's Report is abridged, the Motion is properly returnable today, service of the Motion and the Fourth Receiver's Report in the manner described in the Affidavit of Service is good and

sufficient and no persons other than those listed in Schedule “B” to the Motion (the “**Service List**”) are entitled to service of the Fourth Receiver’s Report or the Motion.

2. The Receiver’s Final Statement of Receipt’s and Disbursements, as set forth at paragraph eight of the Fourth Receiver’s Report, be and is hereby approved.
3. The issued and estimated accounts of the Receiver and the Receiver’s legal counsel, as stated at paragraph 15, 16 and Appendix “A” to the Fourth Receiver’s Report, be and are hereby approved.
4. Upon the closing of the Purchase Agreement (as that term is defined in the Motion), the Receiver shall be discharged as receiver of the OK Falls Property (as that term is defined in Schedule “A” to this Order) and relieved of all further duties and obligations in respect of the OK Falls Property, save and except for that the Receiver shall be authorized and empowered to take any actions that are necessary to conclude the receivership of the OK Falls Property after the Receiver is discharged as receiver of the OK Falls Property.
5. Upon the Receiver being discharged as receiver of the OK Falls Property, the Receiver’s Charge and the Receiver’s Borrowing Charge (as those terms are defined in the Receivership Order) be and are hereby terminated as against the OK Falls Property.
6. Upon the Receiver completing any actions that are necessary to conclude the receivership of the OK Falls Property after the Receiver is discharged as receiver of the OK Falls Property:
 - (a) the Receiver shall forward any remaining funds that the Receiver holds in respect of the OK Falls Property (the “**Remaining Funds**”) to Rompsen Investment Corporation (“**Rompsen**”); and
 - (b) Rompsen shall apply the Remaining Funds towards re-payment of the DIP Facility (as that term is defined in the Order made in the within proceedings on January 11, 2010, and amended by the Order made in the within proceedings on September 23, 2010).
7. As of the date of the Fourth Receiver’s Report and based on the evidence that is currently before the Court, it hereby ordered and declared that:

- (a) the Receiver has acted honestly and in good faith, and has dealt with the OK Falls Property in a commercially reasonable manner;
 - (b) the actions and conduct of the Receiver are approved and the Receiver has satisfied all of its duties and obligations as receiver of the OK Falls Property;
 - (c) the Receiver shall not be liable for any act or omission including, without limitation, any act or omission pertaining to the discharge of the Receiver's duties as receiver of the OK Falls Property, save and except for liability arising out of fraud, gross negligence or wilful misconduct on the part of the Receiver; and
 - (d) any and all claims arising from, relating to or in connection with the performance of the Receiver's duties and obligations as receiver and manager of the OK Falls Property, save and except for claims based on fraud, gross negligence or wilful misconduct on the part of the Receiver, shall be forever barred and extinguished.
8. No action or proceeding arising from, relating to or in connection with the performance of the Receiver's duties and obligations as receiver of the OK Falls Property may be commenced or continued without the prior leave of this Honourable Court, on notice to the Receiver and on such terms as this Honourable Court may direct.
9. Nothing in this Order shall affect:
- (a) the authority provided to the Receiver in the Receivership Order to take actions in respect of the Debtors or the Sorrento Property (as that term is defined in Schedule "B" to the Draft Order); or
 - (b) the validity and priority of the Receiver's Charge and the Receiver's Borrowing Charge as against the Sorrento Property;
10. Service of this Order by email, facsimile, registered mail or personal delivery to the persons listed on the Service List shall constitute good and sufficient service of this Order, and no persons other than those listed on the Service List are entitled to be served with a copy of this Order.

J.C.Q.B.A.

ENTERED THIS _____ DAY OF
OCTOBER, A.D. 2010.

CLERK OF THE COURT

SCHEDULE "A" TO THE ORDER ISSUED OCTOBER 5, 2010

OK FALLS PROPERTY

PARCEL IDENTIFIER: 12-907-073
LOT 7 BLOCK 9 DISTRICT LOT 374 SIMILKAMEEN DIVISION YALE
DISTRICT PLAN 4

PARCEL IDENTIFIER: 012-907-081
LOT 8 BLOCK 9 DISTRICT LOT 374 SIMILKAMEEN DIVISION YALE
DISTRICT PLAN 4

PARCEL IDENTIFIER: 012-907-090
LOT 9 BLOCK 9 DISTRICT LOT 374 SIMILKAMEEN DIVISION YALE
DISTRICT PLAN 4

PARCEL IDENTIFIER: 012-907-111
LOT 10 BLOCK 9 DISTRICT LOT 374 SIMILKAMEEN DIVISION
YALE DISTRICT PLAN 4

PARCEL IDENTIFIER: 012-907-120
LOT 11 BLOCK 9 DISTRICT LOT 374 SIMILKAMEEN DIVISION
YALE DISTRICT PLAN 4

PARCEL IDENTIFIER: 012-907-138
LOT 12 BLOCK 9 DISTRICT LOT 374 SIMILKAMEEN DIVISION
YALE DISTRICT PLAN 4

PARCEL IDENTIFIER: 012-907-154
LOT 13 BLOCK 9 DISTRICT LOT 374 SIMILKAMEEN DIVISION
YALE DISTRICT PLAN 4

PARCEL IDENTIFIER: 012-907-162
LOT 14 BLOCK 9 DISTRICT LOT 374 SIMILKAMEEN DIVISION
YALE DISTRICT PLAN 4

PARCEL IDENTIFIER: 012-907-171
LOT 15 BLOCK 9 DISTRICT LOT 374 SIMILKAMEEN DIVISION
YALE DISTRICT PLAN 4

PARCEL IDENTIFIER: 12-907-189
LOT 16 BLOCK 9 DISTRICT LOT 374 SIMILKAMEEN DIVISION
YALE DISTRICT PLAN 4

PARCEL IDENTIFIER: 012-907-197
LOT 17 BLOCK 9 DISTRICT LOT 374 SIMILKAMEEN DIVISION
YALE DISTRICT PLAN 4

PARCEL IDENTIFIER: 012-907-201
LOT 18 BLOCK 9 DISTRICT LOT 374 SIMILKAMEEN DIVISION
YALE DISTRICT PLAN 4

PARCEL IDENTIFIER: 012-907-219
LOT 19 BLOCK 9 DISTRICT LOT 374 SIMILKAMEEN DIVISION
YALE DISTRICT PLAN 4

PARCEL IDENTIFIER: 012-907-235
LOT 20 BLOCK 9 DISTRICT LOT 374 SIMILKAMEEN DIVISION
YALE DISTRICT PLAN 4

(collectively, the “**OK Falls Property**”)

SCHEDULE "B" TO THE ORDER ISSUED OCTOBER 5, 2010

SORRENTO PROPERTY

PARCEL IDENTIFIER: 008-545-944
LOT 1 SECTION 16 TOWNSHIP 22 RANGE 11 WEST OF THE 6TH
MERIDIAN
KAMLOOPS DIVISION YALE DISTRICT PLAN 16715

PARCEL IDENTIFIER: 003-654-770
LOT 6 SECTION 16 TOWNSHIP 22 RANGE 11 WEST OF THE 6TH
MERIDIAN
KAMLOOPS DIVISION YALE DISTRICT PLAN 31558

(collectively, the "**Sorrento Property**")

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, *THE*
JUDICATURE ACT, R.S.A. 2000, c. J-2, AS
AMENDED AND THE *BUSINESS CORPORATIONS*
ACT, R.S.A. 2000, c. B-9,
AS AMENDED

AND IN THE MATTER OF A PLAN OF
COMPROMISE OR ARRANGEMENT 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.,
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BEARSPAW AT 144TH AVENUE LTD., BEARSPAW
AT 144TH EQUITIES LTD., BEARSPAW AT 144TH
BONDS INC., TSEHUM HARBOUR EQUITIES
LTD., TSEHUM HARBOUR BONDS LTD., ORILLIA
INVESTMENTS LTD., 0726028 B.C. LTD., 0675916
B.C. LTD. and BOSUN'S HOLDINGS LTD.

ORDER

McCARTHY TÉTRAULT LLP

Barristers & Solicitors

Suite 3300, 421-7th Avenue S.W.

Calgary AB T2P 4K9

Sean F. Collins/Walker W. MacLeod

Phone: 403 260-3531

Fax: 403 260-3501

File No.: 125264-415942

SCHEDULE "B"

IN THE MATTER OF SHIRE INTERNATIONAL REAL ESTATE INVESTMENTS LTD. SERVICE LIST

<i>Counsel</i>	<i>Telephone</i>	<i>Fax</i>	<i>Notes</i>
Bennett Jones LLP 4500, 855 - 2nd Street S.W. Calgary, AB T2P 4K7 Attention: Ken Lenz Email: lenzk@bennettjones.com	403-298-3317	403-265-7219	Counsel for the Debtors
Ernst & Young Inc. 1000, 440-2nd Avenue S.W. Calgary, AB T2P 5E9 Attention: Kevin E. Meyler E-Mail: kevin.e.meyler@ca.ey.com Attention: Deryck Helkaa E-Mail: deryck.helkaa@ca.ey.com Attention: Shane Dunn E-Mail: shane.dunn@ca.ey.com	403-260-5096 403-206-5381	403-290-4265 403-260-5075 403-260-5075	Receiver
McCarthy Tétrault LLP 3300, 421-7 th Avenue S.W. Calgary, Alberta T2P 4K0 Attention: Sean F. Collins E-Mail: scollins@mccarthy.ca Attention: Walker W. MacLeod E-Mail: wmacleod@mccarthy.ca	403-260-3531 403-260-3710	403-260-3501 403-260-3501	Counsel for the Receiver
Davis LLP 1000, 250-2 nd Street S.W. Calgary, Alberta T2P 0C1 Attention: Brent Rentiers E-Mail: brentiers@davis.ca Attention: Lance Williams E-Mail: lwilliams@davis.ca	403-698-8755 403-698-8729	403-213-4478 403-697-6621	Counsel for Eyelogic Systems Inc. Counsel for Olympia Trust Company

<i>Counsel</i>	<i>Telephone</i>	<i>Fax</i>	<i>Notes</i>
Gowling Lafleur Henderson LLP P.O. Box 30, Suite 2300. 550 Burrard Street Vancouver, BC V6C 2B5 Attention: John I. McLean E-Mail: john.mclean@gowlings.com Attention: Scott R. Andersen E-Mail: scott.andersen@gowlings.com	604-891-2285 604-891-2289	604-683-3558 604-443-5624	Counsel for Investit Financial Inc.
Gowling Lafleur Henderson LLP 1400, 700-2nd Street S.W. Calgary, AB T2P 4V5 Attention: Craig McMahon E-Mail: craig.mcmahon@gowlings.com	403-298-1874	403-263-9193	Counsel for Investit Financial Inc.
Brownlee LLP 2000, 530-8th Avenue S.W. Calgary, Alberta T2P 3S8 Attention: Peter Leveque E-Mail: pleveque@brownleelaw.com	403-232-8300	403-232-8408	Counsel for 1533021 Ontario Inc.
Witten LLP 2500, 10303 Jasper Avenue Edmonton, Alberta T5J 3N6 Attention: Bud Steen E-Mail: bsteen@wittenlaw.com	780-441-3207	780-429-2559	Counsel for Charles & Meridel Graves
Farris, Vaughan, Wills & Murphy LLP 800, 1708 Dolphin Avenue Kamloops, BC V1Y 9S4 Attention: Peter MacPherson E-Mail: pmacpherson@farris.com	250-869-3881	260-861-8772	Counsel for 0831224 B.C. Ltd.
Blake Cassels & Graydon LLP 3500, 855-2nd Street S.W. Calgary, Alberta T2P 4J8 Attention: Ryan Zahara E-Mail: ryan.zahara@blakes.com	403-260-9628	403-260-9700	Counsel for 9831224 B.C. Ltd.

<i>Counsel</i>	<i>Telephone</i>	<i>Fax</i>	<i>Notes</i>
Borden Ladner Gervais LLP 1000, 400-3rd Avenue S.W. Calgary, Alberta T2P 4H2 Attention: John Blair E-Mail: jblair@blgcanada.com	403-232-9723	403-266-1395	Counsel for Lucia de Wet and Jennifer Lofgren
Alberta Securities Commission 400, 300-5th Avenue S.W. Calgary, Alberta T2P 3C4 Attention: Liam Oddie/Vi Pickering E-Mail: liam.oddie@asc.ca	403-297-6454	403-297-6156	Alberta Securities Commission
MacPherson Leslie & Tyerman LLP 1500, 410-22nd Street E. Saskatoon, SK S7K 5T6 Attention: Jeff Lee E-Mail: jmlee@mlt.com	306-975-7136	306-975-7145	Counsel for 613790 Saskatchewan Ltd., Blair Betts, Shari Bedient and Willie Unger
MacPherson Leslie & Tyerman LLP 1600 Centennial Place 520 – 3rd Avenue S.W. Calgary, Alberta T2P 0R3 Attention: Dean Hutchison E-Mail: dhutchison@mlt.com	403-693-4305	403-508-4349	
Burnet Duckworth & Palmer LLP 1400, 350-7th Avenue S.W. Calgary, Alberta T2P 3N9 Attention: Ben Aberant E-Mail: haberant@bdplaw.com Attention: Trevor Batty E-Mail: tbatty@bdplaw.com Attention: Doug Nishimura E-Mail: dsn@bdplaw.com	403-260-0105 403-260-0100 403-260-0269	403-260-0332 403-260-0332 403-260-0332	Counsel for How Meng Ng 1206354 AB Ltd.
Ministry of Attorney General Legal Services Branch Revenue & Taxation Group 601, 1175 Douglas Street PO Box 9289 Stn Prov Govt Victoria, BC V8W 9J7 Attention: Aaron Welch E-Mail: Aaron.Welch@gov.bc.ca	250-356-8589	250-387-0700	Her Majesty the Queen in right of the Province of British Columbia

<i>Counsel</i>	<i>Telephone</i>	<i>Fax</i>	<i>Notes</i>
Owen Bird Law Corporation 2900, 595 Burrard Street Vancouver, BC V7X 1J5 Attention: Alan A. Frydenlund E-Mail: afrydenlund@owenbird.com Attention: Scott H. Stephens/Greg Tucker E-Mail: sstephens@owenbird.com	604-691-7511 604-691-7521	604-632-4486 604-632-4447	Romspen Mortgage Corporation
Shewchuk, MacDonell, Ormiston, Richardt & Fregeau LLP 214 Main Street South Kenora, ON P9N 1T2 Attention: Bernd Richardt E-Mail: brichardt@kenoralaw.com	807-468-5559	807-468-5504	Kody Stokes
Heenan Blakie LLP 2200, 1055 West Hastings Street Vancouver BC V6E 29 Attention: David Edinger E-Mail: edinger@heenan.ca	604-669-0011	604-669-5101	M. Dayal
Tapper Cuddy LLP 1000, 330 St. Mary Avenue Winnipeg, Manitoba R3C 3Z5 Attention: Peter Halamandaris E-Mail: peterh@tappercuddy.com	204-944-3233	204-947-2593	
Fraser Milner Casgrain 850 – 2nd Street S.W. Calgary, Alberta T2P 0R8 Attention: Robert Kennedy E-Mail: Robert.Kennedy@fmc-law.com	403-268-7161	403-268-3100	

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

IN THE MATTER OF THE *COMPANIES'*
CREDITORS ARRANGEMENT ACT,
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ACT, R.S.A. 2000, c. B-9,
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BEARSPAW AT 144TH AVENUE LTD., BEARSPAW
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BONDS INC., TSEHUM HARBOUR EQUITIES
LTD., TSEHUM HARBOUR BONDS LTD., ORILLIA
INVESTMENTS LTD., 0726028 B.C. LTD., 0675916
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NOTICE OF MOTION

McCARTHY TÉTRAULT LLP

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