

COURT FILE NUMBER Q.B. No. 1693 of 2017

COURT OF QUEEN'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE SASKATOON

APPLICANTS COPPER SANDS LANDS CORP., WILLOW RUSH DEVELOPMENT CORP., MIDTDAL DEVELOPMENTS & INVESTMENTS CORP., PRAIRIE COUNTRY HOMES LTD., JJL DEVELOPMENTS & INVESTMENTS CORP. and MDI UTILITY CORP.

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

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF  
COPPER SANDS LANDS CORP., WILLOW RUSH DEVELOPMENT CORP., MIDTDAL  
DEVELOPMENTS & INVESTMENTS CORP., PRAIRIE COUNTRY HOMES LTD., JJL  
DEVELOPMENTS & INVESTMENTS CORP. and MDI UTILITY CORP.

**NOTICE OF APPLICATION**

**(Extension of Initial Order & Stay of Proceedings)**

**NOTICE TO: Those Parties Identified on The Attached 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 Court.

To do so, you must be in Court when the application is heard as shown below:

Where: Court House  
520 Spadina Crescent East  
Saskatoon, Saskatchewan, Canada

Date: Friday, January 19, 2018

Time: 10:00 a.m. Saskatchewan Time

**Remedy claimed or sought:**

1. An Order pursuant to section 11.02(2) of the *Companies' Creditors Arrangement Act*, RSC 1985, c C-36 (the "CCAA") extending the Initial Order granted in these proceedings on December 20, 2017 by the Honourable Mr. Justice N.G. Gabrielson (the "Initial Order"), and the stay of proceedings provided for therein, from the current expiry date of January 19, 2018 to the date that is thirty (30) days after the date on which the appeals of the Initial Order by Industrial Properties Regina Limited, 101297277 Saskatchewan Ltd. and Affinity Credit Union 2013 in Court of Appeal Files numbered CACV 3176, CACV 3177 and CACV 3178 are heard and decided by the Court of Appeal For Saskatchewan.

2. An Order amending the Initial Order to delete therefrom the requirement in paragraph 45(a) of the Initial Order that the prescribed notification be published in the *Globe and Mail* National edition newspaper.
4. An Order approving of the First Report of the Monitor dated January 16, 2018 and the conduct and activities of the Monitor described therein.
3. Such further and other relief as counsel may request and this Honourable Court may permit.

**Grounds for making this application:**

4. Pursuant to the Initial Order, the Applicants were granted, among other things, the maximum 30-day initial Stay Period permitted by the CCAA, which is set to expire at 11:59 p.m. Saskatchewan Time on Friday, January 19, 2017.
5. At all material times since the commencement of these proceedings under the CCAA and the granting of the Initial Order, the Applicants have acted, and continue to act, in good faith and with due diligence. Further, and in particular, as a result of the diligent efforts of the Applicants, the Applicants closed the sale of the Willow Rush Lands on January 12, 2017, for a sale price far in excess of the value attributed to those lands in the appraisal filed in this Court by Industrial Properties Regina Limited.

**Material or evidence to be relied on:**

6. The Applicant relies upon:
  - (a) this Notice of Application;
  - (b) a proposed form of draft Order (Extension of Initial Order & Stay of Proceedings);
  - (c) the Affidavit of Jaimey Midtdal sworn January 16, 2018;
  - (d) the First Report of the Monitor dated January 16, 2018;
  - (e) a Brief of Law; and
  - (f) such further and other material as this Honourable Court may allow.

**Applicable Acts and regulations:**

7. The *Companies' Creditors Arrangement Act*, RSC 1985, c C-36.

DATED at Saskatoon, Saskatchewan, this 16th day of January, 2018.

**MLT AIKINS LLP**

Per: 

Jeffrey M. Lee, Q.C. and Paul Olfert,  
Counsel for Copper Sands Lands Corp.,  
Willow Rush Development Corp.,  
Midtdal Developments & Investments  
Corp., Prairie Country Homes Ltd., J.J.L  
Developments & Investments Corp. and  
MDI Utility Corp.

**NOTICE**

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 rely on an affidavit or other evidence when the application is heard or considered, you must reply by giving reasonable notice of the material to the applicant.

**CONTACT INFORMATION AND ADDRESS FOR SERVICE**

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Name of lawyer in charge of file: Jeffrey M. Lee, Q.C. and Paul Olfert  
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