

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. JLL 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 PROPOSED PLAN OF ARRANGEMENT FOR THE CREDITORS
OF COPPER SANDS LANDS CORP.,
WILLOW RUSH DEVELOPMENT CORP., MIDTDAL DEVELOPMENTS & INVESTMENTS
CORP., PRAIRIE COUNTRY HOMES LTD.,
JLL DEVELOPMENTS & INVESTMENTS CORP. and MDI UTILITY CORP.

NOTICE OF APPLICATION

(Extension of the Amended and Restated Initial Order)

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 of Queen's Bench 520 Spadina Crescent East Saskatoon, Saskatchewan
Date	Friday, June 14, 2019
Time	9:00 a.m.

(Read the Notice at 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 extending the Amended and Restated Initial Order granted July 5, 2018 in these proceedings by the Honourable Mr. Justice N.G. Gabrielson (the "**Initial Order**") pursuant to the *Companies' Creditors Arrangement Act*, RSC 1985, c C-36 (the "**CCAA**"), as most recently amended by the Order of the Honourable Mr. Justice N.G.

Gabrielson granted May 30, 2019 and the stay of proceedings provided for therein to 11:59 p.m. on _____, 2019.

Grounds for making this application:

2. The Senior Secured Creditors, namely, Industrial Properties Regina Limited and 101297277 Saskatchewan Ltd., have been engaged in recent negotiations with the Copper Sands Group regarding changing the structure of the sales process of the assets of the Copper Sands Group.
3. No agreement has yet been reached between the Senior Secured Creditors and the Copper Sands Group regarding the terms of an amended sales process order. As such, a short extension of the stay of proceedings is necessary and desirable for all parties so that an orderly and structured process will be maintained.
4. The Senior Secured Creditors had estimated that such terms could have been finalized by now but they have not been and they believe that they can be finalized or at least significantly advanced within the coming two to three weeks.

Material or evidence to be relied on:

5. (a) This Notice of Application;
(b) Draft Order; and
(c) Such further and other material as this Honourable Court may allow.

Applicable Acts and regulations:

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

DATED at Regina, Saskatchewan, this 11th day of July, 2019.

MILLER THOMSON LLP

Per: 

Rick M. Van Beselaere, Q.C., Solicitors for
101297277 Saskatchewan Ltd.

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

If prepared by a lawyer for the party:

Name of firm:	<u>Miller Thomson LLP</u>
Name of lawyer in charge of file:	<u>Rick Van Beselaere, Q.C.</u>
Address of legal firm:	<u>Bank of Montreal Building</u> <u>2103-11th Avenue, Suite 600</u> <u>REGINA, SK S4P 3Z8</u> <i>(set out the street address)</i>
Telephone number:	<u>306.347.8300</u>
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File number:	0209995.0001 RMV