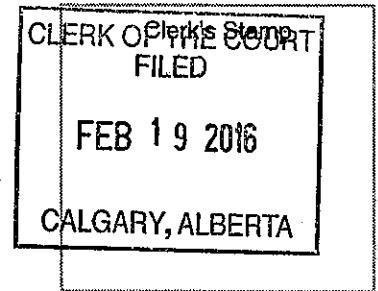


COURT FILE NUMBER 1501-00955  
COURT COURT OF QUEEN'S BENCH  
OF ALBERTA  
IN BANKRUPTCY AND INSOLVENCY  
JUDICIAL CENTRE CALGARY



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

APPLICANTS LUTHERAN CHURCH – CANADA, THE ALBERTA –  
BRITISH COLUMBIA DISTRICT, ENCHARIS  
COMMUNITY HOUSING AND SERVICES, ENCHARIS  
MANAGEMENT AND SUPPORT SERVICES, AND  
LUTHERAN CHURCH – CANADA, THE ALBERTA –  
BRITISH COLUMBIA DISTRICT INVESTMENTS LTD.

DOCUMENT **AFFIDAVIT**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT  
Bishop & McKenzie LLP  
Barristers & Solicitors  
1700, 530 - 8<sup>th</sup> Avenue SW  
Calgary, Alberta T2P 3S8

Attention: Francis N. J. Taman /Ksena J. Court

Telephone: 403-237-5550  
Fax : 403-243-3623

File No.: 103,007-003

**AFFIDAVIT OF CAMERON SHERBAN**  
**Sworn on February 18, 2016**

I, CAMERON SHERBAN, of Calgary, Alberta, SWEAR AND SAY THAT:

1. I am the Chief Restructuring Officer of the Applicants. I have personal knowledge of the matters hereinafter deposed, except where stated to be based on information and belief, and where so stated, I verily believe them to be true.
2. All capitalized terms used in this Affidavit shall have the meaning ascribed to them in the prior Affidavits filed in these proceedings unless otherwise indicated in this Affidavit.

**RELIEF REQUESTED**

3. I make this Affidavit in support of the Application for the following relief:
  - (a) an Order sanctioning the Amended Amended Plans of Compromise and Arrangement of Lutheran Church – Canada, the Alberta – British Columbia District Investments Ltd. (“DIL”);
  - (b) such further and other relief as this Honourable Court may allow.

**BACKGROUND**

4. I am advised by representatives of the Applicants that there are DIL Depositors residing in 8 Canadian provinces and territories and 3 U.S. states.
5. I am further advised by representatives of the Applicants that there are District Depositors residing in 8 Canadian provinces and territories and 11 U.S. states.

**DIL RESTRUCTURING PLAN**

6. On November 30, 2015, the Court granted authorization for DIL its Creditors’ Meeting. Information respecting the DIL Creditors’ Meeting was sent out by the Monitor. An Amended Amended Plan of Compromise and Arrangement for DIL was finalized and was filed with the Court on January 11, 2016 (the “DIL Plan”). This amended plan was also posted to the Monitor’s website.
7. On January 23, 2016, the DIL Creditors’ Meeting was held. The Required Majority of the Eligible Affected Creditors (as those terms are defined in the DIL Plan) was achieved for the DIL Plan.
8. I believe that the DIL Plan is fair and reasonable in the circumstances for the following reasons:
  - (a) The Affected Creditors of DIL were classified into one class and are treated the same. The DIL Plan contemplates that new registered accounts will be set up for the DIL Depositors and administered by the Replacement Fund Manager, which is Great-West Life Assurance Company. The establishment of the new registered accounts received Court approval by Order granted November 5, 2015. The assets administered by DIL will be transferred to these new registered

accounts with the DIL Depositors receiving amounts proportionate to their proven claims.

(b) I am advised by the Monitor that it is supportive of the DIL Plan.

(c) The DIL Plan has been approved by the Affected Creditors of DIL.

(d) The approval of the DIL Plan is in the public interest as it will facilitate and streamline possible future legal proceedings through the establishment of the Representative Action.

9. Throughout the CCAA proceedings, I believe that the Applicants have been complying with all statutory requirements and have adhered to all previous Orders granted by the Court. I am not aware of any actions taken in these proceedings that were not authorized by the CCAA or that are in contravention of any Court Orders.

10. If the DIL Plan is sanctioned by the Court, DIL anticipates implementing the DIL Plan upon all conditions precedent having been met.


11. I make this Affidavit in support of an Application for the relief described above.

SWORN BEFORE ME at Calgary, Alberta,  
this 18th day of February, 2016.

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Commissioner for Oaths in and for Alberta

**JONATHAN A. LANG**  
Barrister & Solicitor

  
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Cameron Sherban