

**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 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 House  
                              520 Spadina Crescent East  
                              Saskatoon, Saskatchewan, Canada

Date:                      Tuesday, September 4, 2018

Time:                     10:00 a.m. Saskatchewan Time

**Remedy claimed or sought:**

1.     An Order:
  - (a)     authorizing the sale of three mobile homes owned by the Applicant Prairie Country Homes Ltd. and located in the Town of Kerrobert, Saskatchewan, by way of a public auction sale; and
  - (b)     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"), and the stay of proceedings provided for therein, to October 15, 2018.

2. Such further and other relief as counsel may request and this Honourable Court may permit.

**Grounds for making this application:**

3. The Applicants applied for an Initial Order pursuant to the *Companies' Creditors Arrangement Act*, RSC 1985, c C-36 (the "CCAA"). This application was initially heard on November 15, 2017 before the Honourable Mr. Justice N.G. Gabrielson. Justice Gabrielson granted the Initial Order on December 20, 2017.
4. The Initial Order was subsequently extended by way of further Orders of the Court on January 19, 2018, January 24, 2018, January 31, 2018, February 2, 2018, March 21, 2018, April 17, 2018, May 25, 2018, June 7, 2018, June 15, 2018 and, finally, July 5, 2018, on which date the Court granted an Amended and Restated Initial Order and extended the stay of proceedings to September 5, 2018.
5. The Applicants are in dialogue with lenders potentially interested in refinancing the Applicants' obligations to their three senior secured creditors (IPR Capital Ltd. ("IPR Capital"), Industrial Properties Regina Limited ("IPRL"), and 101297277 Saskatchewan Ltd. ("7277")), but such refinancing will not be complete by September 5, 2018.
6. The Applicants also remain in dialogue with IPR Capital, IPRL and 7277, and remain hopeful that they will be able to reach an agreement with them prior to the hearing scheduled for September 4, 2018 respecting an extension to the Amended and Restated Initial Order and/or the stay of proceedings provided for therein, so as to provide the Applicants with additional time to secure new financing and retire their obligations to IPR Capital, IPRL and 7277. As such, the Applicants are hopeful that the relief sought at the hearing scheduled for September 4, 2018 can be granted with the consent of IPR Capital, IPRL and 7277.
7. The sale of the three mobile homes owned by the Applicant Prairie Country Homes Ltd. and located in the Town of Kerrobert, Saskatchewan will create liquidity for the Applicants without harming the active business of Copper Sands Land Corp. and MDI Utility Corp.

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

8. The Applicant relies upon:
9. this Notice of Application;

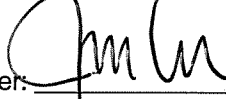
10. Fifth Supplementary Affidavit of Jaimey Midtdal, to be sworn August 30, 2018;
11. Third Report of the Monitor, Deloitte Restructuring Inc., dated August 30, 2018;
12. a proposed form of draft Order; and
13. such further and other material as this Honourable Court may allow.

**Applicable Acts and regulations:**

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

DATED at Saskatoon, Saskatchewan, this 30th day of August, 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., JJL  
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**

Name of firm:	MLT Aikins LLP
Name of lawyer in charge of file:	Jeffrey M. Lee, Q.C. and Paul Olfert
Address of legal firms:	1500 - 410 22nd Street, Saskatoon SK S7K 5T6
Telephone number:	(306) 975-7100
Fax number:	(306) 975-7145
E-mail address:	<a href="mailto:JMLee@mltaikins.com">JMLee@mltaikins.com</a> / <a href="mailto:POlfert@mltaikins.com">POlfert@mltaikins.com</a>
File No:	66727.1