

COURT FILE NUMBER      **Q.B.G. 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 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 House, 520 Spadina Crescent East, Saskatoon, Saskatchewan
Date	Thursday, May 30, 2019
Time	10:00 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 Honorable 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 Honorable Mr. Justice N.G. Gabrielson granted April 15, 2019 and the stay of proceedings provided for therein to 11:59 PM on June 14, 2019.

**Grounds for making this application:**

1. 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.

2. 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.

3. The Copper Sands Group and the Senior Secured Creditors estimate that such terms can be finalized within the coming two weeks.

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

1. This Notice of Application;
2. Draft Order; and
3. Such further and other material as this Honourable Court may allow.

**Applicable rules:**

1. None.

**Applicable Acts and Regulations:**

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

DATED at Regina, Saskatchewan, this 28<sup>th</sup> day of May, 2019.

KANUKA THURINGER LLP

Per: 

Solicitors for Industrial Properties Regina  
Limited

**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**

KANUKA THURINGER LLP  
Barristers and Solicitors  
1400 - 2500 Victoria Avenue  
Regina, Saskatchewan  
S4P 3X2

Address for Service: Same as above

Telephone: (306) 525-7200

Fax: (306) 359-0590

Email address: [dlee@ktllp.ca](mailto:dlee@ktllp.ca) / [ashalashniy@ktllp.ca](mailto:ashalashniy@ktllp.ca)

Lawyer in Charge of File: Diana K. Lee, Q.C. / Alexander K.V. Shalashniy

38681-0001/no  
DM 2227351 v2