

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

COURT OF QUEEN'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE SASKATOON

APPLICANTS COPPER SANDS LAND 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 PROPOSED PLAN OF ARRANGEMENT FOR THE CREDITORS OF
COPPER SANDS LAND 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 of Queen's Bench
520 Spadina Crescent East
Saskatoon, Saskatchewan

Date: Wednesday, June 3, 2020

Time 10:00 am.

NOTE: The hearing of this application will likely take place by telephone pursuant to the Court's procedures during the COVID-19 pandemic. In that case, dial-in particulars will be available from legal counsel to the Applicants by written or e-mailed request.

(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 (Independent Assessment) of the Honourable Mr. Justice N.G. Gabrielson granted April 1, 2020 (the “**Independent Assessment Order**”), and the stay of proceedings provided for therein, to 11:59 p.m. on Friday, July 17, 2020.

Grounds for making this application:

2. On May 11, 2020, pursuant to the Independent Assessment Order, the court-appointed monitor, Deloitte Restructuring Inc. (the “**Monitor**”) has retained Catterall & Wright Consulting Engineers (“**C&W**”) to conduct the independent assessment of the Utility Facility directed by the Independent Assessment Order (the “**Independent Assessment**”).
3. C&W has informed the Monitor that it will require approximately six weeks within which to complete the Independent Assessment. Accordingly, it is anticipated that the Independent Assessment will be completed by C&W on or about June 22, 2020.
4. The Monitor has proposed that the stay of proceedings be extended from Friday, June 5, 2020 to Friday, July 17, 2020.
5. An extension of the Initial Order, and the stay of proceedings provided for therein, from June 5 to July 17, 2020 will provide C&W with adequate time within which to complete the Independent Assessment (which is expected to occur on or about June 22, 2020) and will provide the Court, the Monitor and the parties with an additional four weeks thereafter within which:
 - (a) to review and analyze the Independent Assessment;
 - (b) to determine an appropriate course of action based upon the Independent Assessment;
 - (c) to attempt to reach agreement on next steps in these CCAA proceedings on a consensual basis; and
 - (d) to prepare such further court applications and supporting materials as may

be required in the circumstances,

Material or evidence to be relied on:

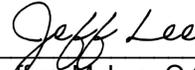
- (a) This Notice of Application;
- (b) The Eighth Report of the Monitor;
- (c) Draft Order; and
- (d) Such further and other material as this Honourable Court may allow.

Applicable Acts and regulations:

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

DATED at Saskatoon, Saskatchewan, this 1st day of June, 2020.

MLT AIKINS LLP

Per: 
Jeffrey M. Lee, Q.C., 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

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