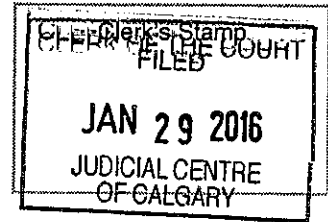


COURT FILE NUMBER 1501-00955
COURT COURT OF QUEEN'S BENCH
OF ALBERTA
IN BANKRUPTCY AND INSOLVENCY
JUDICIAL CENTRE CALGARY



COM

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 APPLICATION BY THE APPLICANTS

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

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

Telephone: 403-237-5550
Fax: 403-263-3423

File: 103,007-003

NOTICE TO RESPONDENT(S)

This application is made against you. You are a respondent.

The Applicants wish to apply for an order restricting access to court proceedings or records.

You have the right to state your side of this matter before the judge.

To do so, you must be in Court when the application is heard as shown below:

Date: Monday, February 8, 2016 – Commercial List
Time: 2:00 PM
Where: Calgary Courts Centre, 601 - 5th Street SW, Calgary, Alberta
Before Whom: The Honourable Justice C.M. Jones in Chambers

Go to 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 declaring service of notice of this application and the supporting materials to be good and sufficient, and shortening the time for service, if necessary;
2. an Order in the form attached as Schedule "A" confirming an amendment to the purchase and sale agreement respecting the District Office and amending the Approval and Vesting Order (District Office) granted November 5, 2015;
3. an Order sealing the Third Confidential Affidavit of Cameron Sherban sworn January 29, 2016 in the form attached as Schedule "B";
4. such further and other relief as this Honourable Court may allow.

Grounds for making this application:

5. The purchaser of the District Office has requested a reduction to the purchase price of the District Office. It is unlikely that the sale of the District Office will close if the purchase price is not reduced.

Material or evidence to be relied on:

6. Affidavit of Cameron Sherban sworn January 29, 2015;
7. Third Confidential Affidavit of Cameron Sherban sworn January 29, 2015;
8. the pleadings and other materials filed herein; and
9. such other and further material as counsel may advise and this Honourable Court may permit.

Applicable rules:

Part 6 Division 1, Rule 13.5, Part 6 Division 4

Applicable Acts and regulations:

Companies' Creditors Arrangement Act, R.S.C. 1985, c. C-36, as amended

Any irregularity complained of or objection relied on:

None

How the application is proposed to be heard or considered:

In person

WARNING

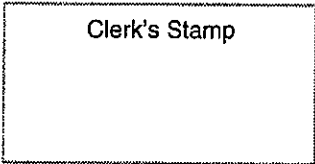
The information that is the subject of this application must not be published before the application is heard without the Court's permission.

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 give evidence in response to the application, you must reply by filing an affidavit or other evidence with the Court and serving a copy of that affidavit or other evidence on the applicant(s) a reasonable time before the application is to be heard or considered.

A person may make an application for an order restricting publication only if a judge has authority to make such an order under an enactment or at common law.

SCHEDULE "A"

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 **ORDER (Amend Order)**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
Bishop & McKenzie LLP
Barristers & Solicitors
1700, 530 - 8th 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

DATE ON WHICH ORDER WAS PRONOUNCED: MONDAY, FEBRUARY 8, 2016
LOCATION WHERE ORDER WAS PRONOUNCED: CALGARY, ALBERTA
NAME OF JUSTICE WHO MADE THIS ORDER: JUSTICE C.M. JONES

UPON THE APPLICATION of Lutheran Church – Canada, the Alberta – British Columbia District (the "District"), EnCharis Community Housing and Services ("ECHS"), EnCharis Management and Support Services ("EMSS"), and Lutheran Church – Canada, the

Alberta – British Columbia District Investments Ltd. (“DIL”) (collectively the “Applicants”); **AND UPON HAVING READ** the Application, the Affidavits of Cameron Sherban; **AND UPON READING** the Reports of the Monitor; **AND UPON HEARING** counsel for the Applicants, counsel for the Monitor, and other interested parties;

IT IS HEREBY ORDERED AND DECLARED THAT:

SERVICE

1. Service of notice of the application for this Order, and all supporting materials, as set out in the Affidavit of Charlene Everett respecting the Application filed February 1, 2016 is good and sufficient, and the time for notice hereof is shortened to the time actually given.
2. All capitalized terms not otherwise defined in this Order shall have the meaning ascribed to them in the Initial Order granted by the Honourable Justice K.D. Yamauchi in this Action dated January 23, 2015 (the “Initial Order”).

AMENDMENT TO DISTRICT OFFICE ORDER

3. The Approval and Vesting Order (District Office) granted on November 5, 2015 is amended such that paragraph 3(c) is deleted and replaced with:

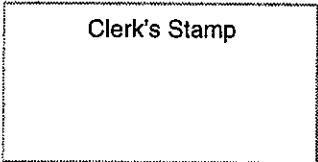
“3(c) “Purchase and Sale Agreement” means the agreement in writing respecting the sale of the Lands from the District to the Purchaser dated October 9, 2015 which is attached as Exhibit “B” to the First Confidential Affidavit of Cameron Sherban sworn October 23, 2015 as amended in writing by the Amending Agreement dated January 8, 2016, which is attached as Exhibit “A” to the Third Confidential Affidavit of Cameron Sherban sworn January 29, 2016;”

4. The Registrar of Land Titles shall comply with this Order and the Approval and Vesting Order (District Office) granted on November 5, 2016 forthwith notwithstanding Section 191(1) of the *Land Titles Act*.

Justice of the Court of Queen’s Bench of Alberta

SCHEDULE "B"

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 **ORDER (Sealing Affidavit)**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
Bishop & McKenzie LLP
Barristers & Solicitors
1700, 530 - 8th 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

DATE ON WHICH ORDER WAS PRONOUNCED: MONDAY, FEBRUARY 8, 2016
LOCATION WHERE ORDER WAS PRONOUNCED: CALGARY, ALBERTA
NAME OF JUSTICE WHO MADE THIS ORDER: JUSTICE C.M. JONES

UPON THE APPLICATION of 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. (collectively the "Applicants"); **AND UPON HAVING READ** the Application, the Affidavits of Cameron Sherban; **AND UPON READING** the Reports of the Monitor; **AND UPON HEARING** counsel for the Applicants, counsel for the Monitor, and other interested parties;

IT IS HEREBY ORDERED AND DECLARED THAT:

1. Division 4 of Part 6 of the Alberta Rules of Court does not apply to this Application.
2. Until the Monitor delivers a certificate to the Court certifying that the sale of the District Lands has closed substantially in accordance with the terms of the purchase and sale agreement for the District Lands, the Third Confidential Affidavit of Cameron Sherban sworn January 29, 2016 (the "Third Confidential Affidavit of Cameron Sherban") and the Affidavit of Service of Charlene Everett dealing with the service of the Application upon the purchaser under the Purchase and Sale Agreement for the District Office approved by the Court on January 20, 2016, as amended, shall be sealed and kept confidential, to be shown only to a Justice of the Court of Queen's Bench of Alberta, and accordingly, shall be filed with the Clerk of the Court who shall keep the Third Confidential Affidavit of Cameron Sherban and the Affidavit of Service of Charlene Everett in a sealed envelope, which shall be clearly marked "SEALED PURSUANT TO THE ORDER OF THE HON. JUSTICE C.M. JONES DATED FEBRUARY 8, 2016". Notwithstanding the foregoing, the Applicants and the Monitor may provide later Affidavit evidence or reports to the Court respecting the sale which is the subject of the Third Confidential Affidavit of Cameron Sherban once such sale has closed.
3. Any party may apply to set aside this Order upon providing the Applicants, the Monitor and all interested parties with five (5) days notice of such application.

Justice of the Court of Queen's Bench of Alberta