COURT FILE NUMBER

1501-00955

COURT

COURT OF QUEEN'S BENCH OF ALBERTA

CLEIM LANGE DEC 12 2017 JUDICA: TO

JUDICIAL CENTRE

CALGARY

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT, R.S.C.

1985, C. c-36 as amended

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.

APPLICANT

DISTRICT SUBCOMMITTEE

RESPONDENTS

THE APPLICANTS IN THESE CCAA PROCEEDINGS AND ALL DEFENDANTS IN THE DISTRICT REPRESENTATIVE ACTIONS NUMBERED: 1603-03142 (ALBERTA QB). \$1611798 (BC SC), \$1611966 (BC SC),

1603-22816 (ALBERTA QB).

DOCUMENT

AFFIDAVIT OF ERINN WILSON

ADDRESS FOR SERVICE

AND

Higgerty Law

CONTACT INFORMATION

OF

Patrick Higgerty Q.C.

PARTY FILING THIS

Suite 101 440 2nd Ave SW

Attention: Clint Docken, Q.C./

Calgary, Alberta T2P 5E9

DOCUMENT

Fax: 587-316-0592

AFFIDAVIT OF ERINN WILSON

Sworn on December 11, 2017

I, Erinn Wilson, of Calgary, Alberta, SWEAR THAT:

- I am a paralegal with Higgerty Law and as such have personal knowledge of the following information, except where I state that it is based on information from another person, in which case, I verily believe that information to be true.
- 2. In these CCAA proceedings, a stay of proceedings was ordered on January 23, 2015 and has continued until it was lifted on October 25, 2017.
- Higgerty Law was retained by the District Subcommittee on November 7, 2017.
- Limitation dates for service on outstanding District Representative Action Claims will expire as early as December 15th, 2017.
- 5. Service of the Statement of Claim, as amended, in the Alberta District Class Action and the Statement of Claim in the BC District Class Action was initiated on December 8, 2017 and it is expected that many of the Defendants in each action will have been served by the time of hearing on December 13th, 2017. However, not all the Defendants will have been served. In addition to the potential for defects in attempted services, the following Defendants will not have been served by then, namely:
 - (a) David Bode, Roland Kubke, Bill Morgan, John Mueller, Glenn Schaeffer, Marvin Mutschler, Steven Grande, Paul Eifert, Hans Heumann, Grant McMaster, James Werschler, David Schoepp, whose addresses are unknown or uncertain at this time; (These individuals were named as Directors and Officers of the Encharis Defendants. Unlike other defence counsel who have agreed to accept service on behalf of other Directors and Officers, counsel for Encharis has failed to do so.)
 - (b) Shepherd's Village Ministries, which is currently in liquidation and may be subject to a Stay of proceedings.
- I swear this Affidavit in support of an Application for an extension for time for service of the Statements of Claim as amended to date as applicable to the Alberta District Class Action and BC District Class Action.

SWORN BEFORE ME

On December 11, 2017, at Calgary, Alberta

Commissioner for Oath in and for the

Province of Alberta

Erinn Wilson

Amandeep Kaur Rai
Barrister & Solicitor
Commissioner for Oaths & Notary Public
in and for Alberta
No expiry as a member of
The Law Society of Alberta