COURT FILE NUMBER

24-2252839 AND 24-2252841

COURT

IN THE COURT OF QUEEN'S BENCH OF ALBERTA IN BANKRUPTCY AND INSOLVENCY JUDICIAL DISTRICT OF EDMONTON

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF

DECHEN GP CORPORATION

-AND -

IN THE COURT OF QUEEN'S BENCH OF **ALBERTA** IN BANKRUPTCY AND INSOLVENCY JUDICIAL DISTRICT OF EDMONTON

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF DECHEN LIMITED PARTNERSHIP



AFFIDAVIT OF TOM PICHE

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY PREPARING THIS **DOCUMENT**

OGILVIE LLP Kentigern A. Rowan, Q.C. Ogilvie LLP 1400, 10303 - Jasper Avenue Edmonton, AB T5J 3N6 Telephone: (780) 429-6236 Facsimile: (780) 701-5936

File Number: 64586.1/KAR

Service will be accepted by delivery or fax. No other form of service will be accepted.

AFFIDAVIT OF TOM PICHE **SWORN THIS** 9-AM DAY OF JUNE, 2017

- I, TOM PICHE, of the Town of Cold Lake, in the Province of Alberta, MAKE OATH AND SAY THAT:
- I am a Director of Dechen GP Corporation and as such, have a personal knowledge of the facts 1. and matters hereinafter deposed to except where otherwise stated.
- 2. Dechen GP Corporation is the general partner of Dechen Limited Partnership. Dechen GP Corporation and Dechen Limited Partnership are hereinafter collectively referred to as "Dechen".

- On May 17, 2017, Dechen filed a Notice of Intention to Make a Proposal to its creditors (the "NOI").
- 4. Since the filing of the NOI, Dechen has:
 - (a) notified its creditors;
 - (b) proceeded to update all accounting, including billings to customers of Dechen;
 - (c) proceeded to locate and consolidated all assets of Dechen;
 - (d) reviewed corporate structures where Dechen is involved to determine value thereof; and
 - (e) appraised equipment owned by Dechen and other related parties.
- At this time, Dechen has not yet completed:
 - (a) the updating of accounting and billing to customers;
 - (b) locating and consolidating all equipment; and
 - (c) although appraisals have been completed on some of the equipment, the appraisals have not yet been provided and other equipment needs to be located and consolidated in order to have appraisals completed.
- In the circumstances, I do verily believe that Dechen requires an extension of the time to file a
 Proposal to its creditors so it can complete the foregoing and formulate the best possible
 Proposal to its creditors.
- 7. I do verily believe that:
 - (a) Dechen has acted and is continuing to act in good faith and with due diligence in completing the preliminary work and preparation of a Proposal to its creditors;
 - (b) Dechen will likely be able to make a viable Proposal to its creditors if an extension is granted;

TOM PICHE

(c) no creditor will be materially prejudiced if the extension requested herein is granted.

8. I make this Affidavit in support of an Application by Dechen for an extension of the time within which to file a Proposal in these proceedings.

SWORN BEFORE ME at Cold Lake, In the Province of Alberta, this 9th day of June, 2017.

(Commissioner for Oaths in and for the

Province of Alberta)

WILMA M. JACKNIFE Barrister & Solicitor

A Notary Public & A Commissioner for Oaths in and for Alberta

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