

COURT FILE NUMBER Q.B.G. 1694 of 2020

COURT OF QUEEN'S BENCH FOR SASKATCHEWAN
IN BANKRUPTCY AND INSOLVENCY

JUDICIAL CENTRE REGINA

APPLICANT INDUSTRIAL PROPERTIES REGINA LIMITED AND
101297277 SASKATCHEWAN LTD.

RESPONDENTS COPPER SANDS LAND CORP.

IN THE MATTER OF THE RECEIVERSHIP OF COPPER SANDS LAND CORP.

NOTICE OF APPLICATION

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
2425 Victoria Avenue
Regina, Saskatchewan

Date Tuesday, December 14, 2021

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.)

Due to the health risks posed by the COVID-19 pandemic, all chambers applications will be heard by telephone unless the presiding judge has decided otherwise. To confirm the telephone number where you can be reached on the date of the application, you must immediately contact the office of the local registrar at Regina, Saskatchewan at (306) 787-5377 and provide your telephone number. You must remain available by telephone at that number on that date until your matter is heard.

Webex Virtual Courtroom Information
Join by computer with video and audio
Regina Queen's Bench Virtual Room 02
<https://skcourts.webex.com/meet/RGQB02>

Meeting number: 965 722 187

Join by video system (SIP)

Dial RGQB02@skcourts.webex.com

You can also dial 173.243.2.68 and enter meeting number: 965 722 187

Join by phone (backup option if computer webex does not work)

+1-833-311-4101 Canada Toll Free (use this number if calling from outside Regina or Saskatoon)

+1-306-271-1492 Canada Toll (Regina – use this number if calling from Regina)

+1-306-808-2023 Canada Toll (Saskatoon – use this number if calling from Saskatoon)

Access code: 965 722 187

Remedy claimed or sought:

1. MNP Ltd. (the “Receiver”) as the receiver of the assets, properties and undertakings of Copper Sands Land Corp., seeks an Order:
 - (a) Approving the actions, conduct and activities of the Receiver to December 6, 2021;
 - (b) Approving the Receiver’s Interim Statement of Receipts and Disbursements, the Receiver’s professional fees and disbursements, and the professional fees and disbursements of the Receiver’s counsel;
 - (c) Increasing the Receiver’s borrowing charge and amending the form of the Receiver’s Certificate;
 - (d) Sealing the Confidential Addendum to the First Report of the Receiver;
 - (e) Authorizing the Receiver to disclaim servicing agreements with MDI Utility Corp.;
 - (f) Authorizing the Receiver to make arrangements for the delivery and provision of alternate water, waste water and/or sewer services; and
 - (g) Authorizing the Receiver to complete the construction of a water line to connect to the water main operated by the R.M. of Edenwold;
 - (h) Extending certain liability protections in the Order issued October 27, 2020 (the “Receivership Order”).

Grounds for making this application:

2. The Receiver makes this application pursuant to the Receivership Order.
3. Further grounds for making this application are set out in the Receiver’s Brief of Law.

Material or evidence to be relied on:

4. This Notice of Application, with proof of service;
5. The First Report of the Receiver dated December 6, 2021;

6. The Confidential Addendum to the First Report of the Receiver, to be filed on December 9, 2021;
7. Proof of Compliance with General Application Practice Directive #3;
8. Draft Order;
9. Brief of Law
10. The Service List; and
11. Such further and other material as this Honourable Court may allow.

Applicable rules:

12. *Queen's Bench Rules*, Rule 6-5.

Applicable Acts and regulations:

13. The *Bankruptcy and Insolvency Act*, RSC, 1985, c B-3.

DATED at Saskatoon, Saskatchewan, this 7th day of December, 2021.

LELAND KIMPINSKI LLP

Per: 

Solicitors for the Receiver, MNP Ltd.

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 FOR MNP LTD., AS RECEIVER
OF THE ASSETS, PROPERTIES AND UNDERTAKINGS OF COPPER SANDS LAND CORP.:**

Name of firm: Leland Kimpinski LLP
Name of lawyers in charge of file: Ryan A. Pederson
Address of legal firm: 336 6th Avenue North
Saskatoon, SK S7K S5

Telephone number: (306) 653-6474
Fax number: (306) 653-7008
Email address: rpederson@lelandlaw.ca
File Number: WP95774