

COURT FILE NUMBER **24-2536824**

COURT COURT OF QUEEN'S BENCH OF ALBERTA
IN BANKRUPTCY AND INSOLVENCY

JUDICIAL CENTRE EDMONTON

 IN THE MATTER OF THE BANKRUPTCY AND
INSOLVENCY ACT, RSC 1985, C b-3

 AND IN THE MATTER OF THE NOTICE OF
INTENTION TO MAKE A PROPOSAL OF
R.D.E. VENTURES INC.

COURT FILE NUMBER **24-2536823**

COURT COURT OF QUEEN'S BENCH OF ALBERTA
IN BANKRUPTCY AND INSOLVENCY

JUDICIAL CENTRE EDMONTON

 IN THE MATTER OF THE BANKRUPTCY AND
INSOLVENCY ACT, RSC 1985, C b-3

 AND IN THE MATTER OF THE NOTICE OF
INTENTION TO MAKE A PROPOSAL OF
FRONTLINE CIVIL HOLDINGS INC.

DOCUMENT **APPLICATION**

ADDRESS FOR SERVICE
AND CONTACT
INFORMATION OF PARTY
FILING THIS DOCUMENT

OGILVIE LLP
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Edmonton AB T5J 3N6
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File No.: 66964.1
**Service will be accepted by delivery or fax. No
other form of service will be accepted.**

NOTICE TO RESPONDENT(S):

This application is made against you. You are a respondent. You have the right to state your side of this matter before the master/judge.

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

Date:	August 19, 2019
Time:	2:00 p.m.
Where:	Law Courts, Edmonton, Alberta
Before Whom:	The Honourable Justice J.H Goss

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:
 - (a) abridging time for service of this Application and deeming service good and sufficient; and
 - (b) extending the time within which Frontline Civil Holdings Inc. ("Frontline") and R.D.E. Ventures Inc. ("R.D.E.") and or either one of them can file a Proposal pursuant to these proceedings for such time as this Honourable Court deems appropriate.

Grounds for making this application:

2. Both Frontline and R.D.E. filed Notices of Intention to make Proposals to their Creditors.
3. The initial time for filing the Proposals expires on Monday, August 19, 2019.
4. Frontline and R.D.E. have diligently been working toward preparing a Proposal to their Creditors.
5. Notwithstanding the diligent work of Frontline and R.D.E. they are to yet in a position to file a Proposal to their Creditors.
6. Frontline and R.D.E. are acting in good faith and with due diligence.

7. Frontline and R.D.E. would likely be able to make Proposals if the extension requested is granted.
8. No Creditor will be prejudiced if the extension as requested is granted.

Material or evidence to be relied on:

9. The First Report of Bowra Inc. as Proposal Trustee of Frontline and R.D.E., respectively.
10. Affidavit of Dean Eastman.

Applicable rules:

11. N/A.

Applicable Acts and regulations:

12. *Bankruptcy and Insolvency Act*, R.S.C. 1985, c.B-3, including, but not limited to, sections 50.4(9).

Any irregularity complained of or objection relied on:

13. None.

How the application is proposed to be heard or considered:

14. In person, before the Honourable Mr. Justice J.H. Goss.

WARNING

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.