

COURT FILE NO. 24-2616200

COURT COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE EDMONTON

Clerk's Stamp:

IN THE MATTER OF THE NOTICE OF INTENTION TO
MAKE A PROPOSAL OF TRI-AG IMPLEMENTS LTD.

DOCUMENT **APPLICATION BY BOWRA GROUP INC.**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	McLENNAN ROSS LLP #600 McLennan Ross Building 12220 Stony Plain Road Edmonton, AB T5N 3Y4	Lawyer: Charles P. Russell, Q.C. Telephone: (780) 482-9115 Fax: (780) 733-9757 Email: crussell@mross.com File No.: 20201028
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NOTICE TO RESPONDENT: 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 Justice in Chambers.

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

Date:	Tuesday, March 10, 2010
Time:	3:00 p.m.
Where:	Law Courts, 1A Sir Winston Churchill Square, Edmonton, AB T5J 0R2
Before Whom:	Justice R.A. Graesser

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 abridging the time for notice of this application and deeming service good and sufficient.
2. An order declaring that certain property of Tri-Ag Implements Ltd. ("Tri-Ag") be subject to a security or charge in the amount of \$50,000, in respect of the fees and expenses of Bowra Group

Inc. ("Bowra") as Proposal Trustee, including the fees and expenses of Bowra's legal counsel, incurred in connection with this application and a review of the claims of certain secured creditors of Tri-Ag;

3. An order directing that the security or charge referenced above rank in priority over the claims of certain secured creditors of Tri-Ag.
4. An order providing advice and direction with respect to the manner in which it is to gather from secured creditors evidence of their security interests in Tri-Ag's assets, in connection with Bowra's review of security as may be directed by this Court;
5. An order directing which property of Tri-Ag is to be subject to the charge referenced in paragraph 2 above;
6. An order directing which of Tri-Ag's creditors asserting a security interest over property of Tri-Ag, will be required to submit their security to Bowra for review;
7. Such further and other relief as counsel may advise.

Grounds for making this application:

8. Bowra acts as Proposal Trustee in these proceedings;
9. In the event the sale of assets proposed by Tri-Ag in these proceedings, is approved, the validity and priority of the security interests claimed in the proceeds generated from such sale must be determined;
10. This Court may direct that other secured creditors taking possession of assets in the course of these proceedings, have the validity, enforceability and priority of their respective charges reviewed by Bowra;
11. Such further and other grounds as may appear at the motion.

Material or evidence to be relied on:

12. Trustee's First Report to Court (March 9, 2020);
13. Such further and other evidence as counsel may advise and this Honourable Court may permit.

Applicable rules:

14. Alberta Rules of Court rules 1.3, 1.4, and 3.68;
15. Such further and other statutes and rules as counsel may advise.

Applicable Acts and Regulations:

16. Section 64.2 of the *Bankruptcy and Insolvency Act*;
17. Such further and other Acts and regulations as counsel may advise and this Honourable Court may permit.

Any irregularity complained of or objection relied on:

18. None.

How the application is proposed to be heard or considered:

19. Trustee's First Report to Court and oral argument made in person.

AFFIDAVIT EVIDENCE IS REQUIRED IF YOU WISH TO OBJECT.

WARNING

If you do not come to Court either in person or by your lawyer, the Court may give the Applicants 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 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 Applicants a reasonable time before the application is to be heard or considered.