

COURT FILE NUMBER Q.B. No. 1455 of 2019

COURT OF QUEEN'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE SASKATOON

IN THE MATTER OF SECTION 204 OF *THE BUSINESS CORPORATIONS ACT*, RSS 1978, c B-10
AND IN THE MATTER OF THE VOLUNTARY LIQUIDATION AND DISSOLUTION OF PRIMEWEST
MORTGAGE INVESTMENT CORPORATION

NOTICE OF APPLICATION

NOTICE TO RECIPIENTS LISTED ON THE SERVICE LIST FILED HEREWITH

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: 520 Spadina Crescent East, Saskatoon, SK

Date: August 31, 2021

Time: 10:00 AM

(Read the Notice at the end of this document to see what else you can do and when you must do it.)

Remedy claimed or sought:

1. The Applicant, KPMG Inc., in its capacity as liquidator (the "**Liquidator**") of PrimeWest Mortgage Investment Corporation, seeks an Order:
 - a. abridging the time for service of this Notice of Application and the materials filed in support thereof (to the extent required);
 - b. approving the Third Report of the Liquidator (the "**Third Report**") filed herewith; and
 - c. approving the Litigation Plan set forth at Appendix "A" to the Third Report.

Grounds for making this application:

Approval of the Third Report

2. Pursuant to Article 4.5 of the Liquidation Plan approved by this Honourable Court, the Liquidator is required to report to the Court from time to time, and make such reporting available on its website. The Liquidator has prepared its Third Report in compliance with its obligations, and now seeks to have it approved by the Court.

Approval of the Litigation Plan

3. Counsel to the various parties to the Burwash Action and the Granite Action (as those terms are defined in the Third Report), with the exception of counsel to P.I. Financial, have agreed to a Litigation Plan in respect to those actions. The parties now seek to have that Litigation Plan approved by the Court in order that those actions may proceed in a timely manner.

Material or evidence to be relied on:

4. Notice of Application, dated August 16, 2021;
5. The Third Report of the Liquidator, dated August 16, 2021;
6. A Draft Order; and
7. Such further and other materials as this Honourable Court may allow.

Applicable Rules:

8. None.

Applicable Acts and Regulations:

9. *The Business Corporations Act*, RSS 1978, c B-10.

DATED at Saskatoon, Saskatchewan, this 16th day of August, 2021.

THE W LAW GROUP LLP

Per: 

Mike Russell and Nick Conlon,
Solicitors for the Applicant, KPMG Inc.

This Notice of Application was delivered by:

Name of firm:	W Law LLP
Name of lawyer in charge of file:	Mike Russell and Michelle Tobin
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TO: ALL RECIPIENTS LISTED ON THE SERVICE LIST