



NO. S-1510120
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c. C-36, AS AMENDED

AND

IN THE MATTER OF THE *BUSINESS CORPORATIONS ACT*,
S.B.C. 2002, c. 57, AS AMENDED

AND

IN THE MATTER OF THE PLAN OF COMPROMISE OR ARRANGEMENT OF NEW WALTER ENERGY CANADA HOLDINGS, INC., NEW WALTER CANADIAN COAL CORP., NEW BRULE COAL CORP., NEW WILLOW CREEK COAL CORP., NEW WOLVERINE COAL CORP. AND CAMBRIAN ENERGYBUILD HOLDINGS ULC

PETITIONERS

NOTICE OF APPLICATION

Name of applicants: New Walter Energy Canada Holdings, Inc., New Walter Canadian Coal Corp., New Brule Coal Corp., New Willow Creek Coal Corp., New Wolverine Coal Corp., and Cambrian Energybuild Holdings ULC (the "**New Walter Canada Group**")

To: Service List attached hereto as **Schedule "A"**

TAKE NOTICE that an application will be made by the applicants to the Honourable Madam Justice Fitzpatrick at the courthouse at 800 Smithe Street, Vancouver, BC, V6Z 2E1 on November 22, 2019 at 9:00 a.m. for the order set out in Part 1 below.

Part 1: ORDERS SOUGHT

1. An Order substantially in the form attached hereto as **Schedule "B"**:
 - (a) extending the stay of proceedings in respect of the New Walter Canada Group to February 28, 2020.

Part 2: FACTUAL BASIS

1. Reference is made to the facts set out in the Twenty-ninth Affidavit of William E. Aziz (the "**Twenty-ninth Aziz Affidavit**").
2. Any capitalized term used but not defined below shall have the meaning given to it in the Twenty-ninth Aziz Affidavit.
3. On December 7, 2015, this Honourable Court granted an initial order (as amended and restated from time to time, the "**Initial Order**") in favour of the Old Walter Canada Group pursuant to the *Companies' Creditors Arrangement Act*, RSC 1985, c C-36, as amended (the "**CCAA**").

4. The Initial Order granted a stay of proceedings until January 6, 2016 or such later date as this Honourable Court may order (the "**Stay Period**").
5. The terms of the Initial Order, including the Stay Period, were subsequently extended by further orders of the Court to November 26, 2019.
6. These proceedings are substantially complete:
 - (a) the New Walter Canada Group's Amended and Restated Plan of Compromise and Arrangement dated June 22, 2018 (the "**Amended Plan**") was sanctioned on July 3, 2018 and implemented as of April 24, 2019;
 - (b) there are no unresolved claims remaining in this proceeding; and
 - (c) all Proven Claims (as defined in the Amended Plan) have been paid except for certain employee claims.
7. However, there are two outstanding issues that must be addressed before these proceedings can be terminated.
8. First, Service Canada must complete its work in respect of any repayment of employment benefits received by employees of Old Walter Canada Group.
9. Second, the New Walter Canada Group must wind up Walter UK, which consists of Energybuild Group Limited ("**EBG**"), Energybuild Holdings Limited ("**EBH**"), and Energybuild Opencast Limited ("**EBO**"), under the Settlement Term Sheet among the New Walter Canada Group, Warrior and the 1974 Plan dated October 10, 2017.
10. EBO was dissolved on May 14, 2019 and the liquidation of EGL and EGH is currently underway.
11. The remaining steps to liquidate EBG and EBH comprise two phases. The first phase includes tasks leading up to the payment of all surplus cash to Warrior. The second phase is the period thereafter in which EBG and EBH are finally dissolved.
12. The New Walter Canada Group is requesting an extension of the Stay Period until and including February 28, 2020 to address remaining issues, including completing distributions to creditors and finishing the first phase of winding up Walter UK and making the related payment to Warrior.
13. Based on the current cash flow projections, it is expected that the New Walter Canada Group will have sufficient operating cash to continue operations during the proposed extended Stay Period.
14. The New Walter Canada Group has been proceeding in good faith and with due diligence in these proceedings.
15. The Monitor supports the extension of the Stay Period and will file a report attaching cash flow forecasts that demonstrate, subject to the assumptions more fully set out in the report, that the New Walter Canada Group has sufficient liquidity to continue its operations as currently conducted through to the end of the proposed extended Stay Period.
16. It is in the best interests of the New Walter Canada Group and all its stakeholders that the Stay Period be extended to February 28, 2020 to permit completing distributions to creditors, winding up the remaining Walter UK entities, and bringing a motion to terminate these proceedings.

Part 3: LEGAL BASIS

The Requested Stay Extension Should be Granted

17. Section 11.02(2) of the CCAA gives this Court express jurisdiction to extend the Stay Period.
18. Under s. 11.02(3), on an application seeking a stay extension, the Court will consider whether (i) the applicant has acted, and is acting, in good faith and with due diligence; and (ii) if circumstances exist that make the order appropriate.
19. The New Walter Canada Group has been acting in good faith and with due diligence in these proceedings.
20. It is appropriate to grant the requested stay extension because it will permit completing distributions to creditors in accordance with the Amended Plan, winding up the remaining Walter UK entities, and bringing a motion to terminate these proceedings.
21. Therefore, the requested stay extension should be granted.

Other Grounds

22. *Companies' Creditors Arrangement Act*, RSC 1985, c C-36, as amended;
23. *Supreme Court Civil Rules*, BC Reg 168/2009, including Rules 8-1 and 13-1; and
24. The inherent and equitable jurisdiction of this Honourable Court and such further and other legal bases and authorities as counsel may advise and this Honourable Court may permit.

Part 4: MATERIAL TO BE RELIED ON

1. The Twenty-ninth Aziz Affidavit;
2. Monitor's 24th Report, to be filed;
3. Pleadings and other materials filed herein; and
4. Such further and other materials as counsel may advise and this Honourable Court may permit.

The applicant(s) estimate(s) that the application will take 45 minutes.

This matter is within the jurisdiction of a master.

This matter is not within the jurisdiction of a master. The Honourable Madam Justice Fitzpatrick is seized of these proceedings and the hearing of this application has been arranged with Trial Scheduling.

TO THE PERSONS RECEIVING THIS NOTICE OF APPLICATION: If you wish to respond to this Notice of Application, you must, within 5 business days after service of this Notice of Application or, if this application is brought under Rule 9-7, within 8 business days of service of this Notice of Application,

- (a) file an Application Response in Form 33,
- (b) file the original of every affidavit, and of every other document, that
 - (i) you intend to refer to at the hearing of this application, and
 - (ii) has not already been filed in the proceeding, and

- (c) serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:
- (i) a copy of the filed Application Response;
 - (ii) a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on that person;
 - (iii) if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7(9).

Dated: November 12, 2019

Wahid Malik
For Lawyers for the Petitioners
Osler, Hoskin & Harcourt LLP
(Marc Wasserman & Mary Paterson)

To be completed by the court only:

Order made

in the terms requested in paragraphs _____ of Part 1 of this Notice of Application

with the following variations and additional terms:

Date: _____

Signature of

Judge Master

SCHEDULE "A"

(see attached)

SERVICE LIST
(as of November 5, 2019)

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SCHEDULE "B"

(see attached)

NO. S-1510120
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA
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IN THE MATTER OF THE PLAN OF COMPROMISE AND ARRANGEMENT OF NEW WALTER
ENERGY CANADA HOLDINGS, INC., NEW WALTER CANADIAN COAL CORP., NEW BRULE COAL
CORP., NEW WILLOW CREEK COAL CORP., NEW WOLVERINE COAL CORP. AND CAMBRIAN
ENERGYBUILD HOLDINGS ULC

PETITIONERS

ORDER MADE AFTER APPLICATION
(Stay Extension)

BEFORE THE HONOURABLE)
MADAM JUSTICE FITZPATRICK) FRIDAY, THE 22ND DAY OF
NOVEMBER, 2019

ON THE APPLICATION of the Petitioners coming on for hearing at Vancouver, British Columbia, on the 22nd day of November, 2019; AND ON HEARING Marc Wasserman and Mary Paterson, counsel for the Petitioners, Peter Reardon, counsel for KPMG Inc. and those other counsel listed on **Schedule "A"** hereto; AND UPON READING the material filed, including the 29th Affidavit of William E. Aziz sworn November 12, 2019, and the 24th Report of KPMG Inc. in its capacity as Monitor dated November ●, 2019;

THIS COURT ORDERS AND DECLARES THAT:

SERVICE AND DEFINITIONS

1. The time for service of the notice of application for this order is hereby abridged and deemed good and sufficient and this application is properly returnable today.
2. All capitalized terms not otherwise defined in this Order shall have the meanings ascribed to them in the Initial Order in these proceedings dated December 7, 2015 (the "**Initial Order**").

Draft

STAY EXTENSION

3. The Stay Period, as defined in paragraph 18 of the Initial Order, is hereby further extended up to and including February 28, 2020.

GENERAL

4. Endorsement of this Order by counsel appearing, other than counsel for the Petitioners, is hereby dispensed with.

THIS COURT REQUESTS the aid and recognition of other Canadian and foreign Courts, tribunals, regulatory or administrative bodies, including any Court or administrative tribunal of any Federal or State Court or administrative body in the United States of America, to act in aid of and to be complementary to this Court in carrying out the terms of this Order where required. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Petitioners and to the Monitor, as an officer of this Court, as may be necessary or desirable to give effect to this Order, to grant representative status to the Monitor in any foreign proceeding, or to assist the Petitioners and the Monitor and their respective agents in carrying out the terms of this Order.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT:

Mary Paterson
Counsel for the Petitioners

BY THE COURT

REGISTRAR

Draft

SCHEDULE "A"

COUNSEL LIST	
NAME	PARTY REPRESENTED

Draft

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PETITIONERS

ORDER MADE AFTER APPLICATION
(Stay Extension)

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Client Matter No. 1164807

Draft

NO. S-1510120
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PETITIONERS

NOTICE OF APPLICATION
(Stay Extension)

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