

COURT FILE NUMBER 1103 18646
COURT QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE EDMONTON



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

AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF ARMAC INVESTMENTS LTD. (AB),
LAKE EDEN PROJECTS INC. (AB), 1204583 ALBERTA
INC. (AB), 1317517 ALBERTA INC. (AB), WESTRIDGE
PARK LODGE DEVELOPMENT CORP (AB), and
WESTRIDGE PARK LODGE AND GOLF RESORT LTD.
(AB), HALF MOON LAKE RESORT LTD. (AB), NO. 50
CORPORATE VENTURES LTD. (BC), FISHPATH
RESORTS CORPORATION (BC), ARMAC INVESTMENT
LTD. (BC), OSTROM ESTATES LTD. (BC), HAWKEYE
MARINE GROUP LTD. (BC), JUBILEE MOUNTAIN
HOLDINGS LTD. (BC), GIANT MOUNTAIN PROPERTIES
LTD. (BC), and CHERRY BLOSSOM PARK
DEVELOPMENT CORP (BC)

DOCUMENT **AFFIDAVIT OF JOHN KENNETH PURDY sworn on
November 19th, 2014**

ADDRESS FOR SERVICE Taylor Law Office
AND Suite 401, 10722 – 103 Avenue
CONTACT Edmonton, Alberta
INFORMATION OF T5J 5G7
PARTY FILING THIS Attention: Conan J. Taylor
DOCUMENT Phone: (780) 428-7770
Fax: (780) 428-7775

I, JOHN KENNETH PURDY (also known as "Jack Purdy"), businessman, of the County
of Strathcona, in the Province of Alberta, MAKE OATH AND SAY THAT:

1. I have reviewed the Twenty Eighty Report of the Monitor/Eleventh Report of the
Proposal Trustee (the "28th Report") now filed and served in this matter. I confirm

that all statements and reporting I have made to the Monitor and upon which the Monitor has based its conclusions and recommendations as set out in the 28th Report have been made by me in good faith and are true, and are put forward, confirmed and attested to by me as if set out and expressly stated in this my Affidavit.

2. I further adopt and confirm, or attest to my belief, in all facts and assumptions upon which the Monitor has relied in making its recommendations with respect to: the Applicant Companies' application for the Half Moon and BC properties vesting and discharge orders; the Applicant Companies' application to grant an Order amending section 5.3 of the Second Amended Plan; the Monitor's application with respect to both the sale of the River Road Property and disposition of proceeds; the Proposal Trustee's application with respect to distributing the net proceeds from the sale of the Meshers Road Property; and the proposed stay extension to and including January 16th, 2015.
3. I believe that if the Applicant Companies' application for the Half Moon and BC properties vesting and discharge orders are granted, and provided that the leave to appeal period in respect of these orders has expired and no leave to appeal has been granted, then the Applicant Companies will be able to successfully satisfy all the condition precedents for Plan Implementation as set out in the Second Amended Plan within the requested stay extension time period through and to January 16th, 2015.
4. With respect to the discharges being sought for the various charges registered against the Applicant Companies' various properties in both Alberta and British Columbia, I have reviewed same and believe that in all cases these relate to either: Affected Creditors that are subject to the Second Amended Plan; disallowed Claims; Claims not filed before the Claims Bar Date; or Claims registered on title during the CCAA proceedings while the stay of proceedings was in place. Accordingly, I believe that all the charges the Applicant Companies are seeking to have discharged are properly dischargeable by this Honourable Court as contemplated.
5. With respect to the Half Moon Financing, a Revised Trust Letter has now been finalized, and is attached to the 28th Report as Appendix "A". All security and other documents required by the Revised Trust Letter have been executed and provided now to the lender's counsel, Mr. Tighe, pursuant to the terms of the Revised Trust Letter. I am advised by the Applicant Companies' counsel, Mr. Taylor, that his trust account information were provided to Mr. Tighe and that the Half Moon Financing monies have now been wired into his trust account

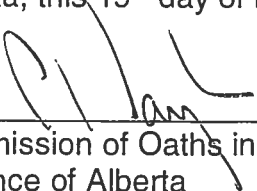
pursuant to the terms of the Revised Trust Letter. If the Applicant Companies' application for the Half Moon and BC properties vesting and discharge orders are granted, and provided that the leave to appeal period in respect of these orders has expired and no leave to appeal has been granted, then pursuant to the terms of the Revised Trust Letter I am advised that Mr. Taylor will release the Half Moon financing monies to the Monitor's counsel in accordance with the terms of the Revised Trust Letter and these monies will be utilized to fund required payments under Article 5.3 (as to be amended) under the Second Amended Plan.

6. With respect to the BCOpCo Financing as contemplated in the Second Amended Plan, the Interim/DIP lender has agreed to roll over and extend its financing to stand as the BCOpCo Financing, subject to this Honourable Court granting the amendments to Article 5.3 of the Second Amended Plan as are being sought by the Applicant Companies in the within application. While this will result in a shortfall in respect of the originally contemplated BCOpCo Financing amount, much of this shortfall will be made up by the increased Half Moon Financing, and so for this and other reasons the net financing available after the interest reserves is not in my belief materially less than originally contemplated.
7. With respect to the amendments to Article 5.3 of the Second Amended Plan being sought by the Applicant Companies, for the reasons set out above I believe that they are minor and immaterial in nature, will not materially prejudice the interest of any of the Creditors under the Second Amended Plan or the Sanction Order, and are necessary in order to give effect to the substance of the Plan.
8. With respect to the Alberta Health Orders registered on title to the Half Moon Lake lands (registered as Instrument Numbers 102 396 428 and 112 125 253), I am advised by Mr. Taylor that he has received written confirmation from Mr. O'Neil, legal counsel for Alberta Health Services ("AHS"), that AHS has agreed to discharge these registrations. Mr. Taylor informs me that he has inquired further with Mr. O'Neil's office and they in turn have indicated that AHS itself has advised their office that discharges have now been submitted to the Land Titles Office, although a current search of title indicates that these registrations have not yet been discharged.
9. With respect to the Veronica Del C Vasquez registration on title to the Half Moon Lake lands and the associated Consolidated Civil Enforcement Notice of Intention to Sell (registered respectively as Instrument Numbers 122 228 593 and 122 284 590), I attached to this my Affidavit as Exhibit "A" the Court record in respect of Ms. Vasquez's claim. The claim arose and was filed prior to the Initial

Order in the within CCAA proceeding. Ms. Vasquez was advised, as subsequently was Consolidated Civil Enforcement of the CCAA proceeding and the need to contact the Monitor and deal with her claim in the CCAA claims proving process. Unfortunately, we somehow did not receive or overlooked a Notice of Trial subsequently send out by the Provincial Court in the action, and Ms. Vasquez proceeded to trial and obtained judgment. In my belief, there was no substantive merit to Ms. Vasquez's claim, however, the fact is that she failed, despite notice, to pursue a claim in the within CCAA process, and accordingly in believe her claim and associated registration should be barred and discharged.


10. I believe that the Applicants have or will have sufficient available cash to meet their current obligations through the requested Stay Extension period, or be able to make arrangements satisfactory to any arising post-stay creditors.
11. The Applicants are acting in good faith and with due diligence, and in the best interests of their creditors.
12. I believe that no creditor will be materially prejudiced if the Stay Extension or other relief being applied for is granted.
13. As set out in the 28th Report, the Monitor supports and recommends orders being sought by the Applicant Companies in the within applications.
14. I make this Affidavit in support of: the Applicant Companies' application for the Half Moon and BC properties vesting and discharge orders; the Applicant Companies' application to grant an Order amending section 5.3 of the Second Amended Plan; and the proposed stay extension to and including January 16th, 2015.
15. The Applicant Companies do not oppose the orders being sought by the Monitor in respect of: the Monitor's application with respect to both the sale of the River Road Property and disposition of proceeds; the Proposal Trustee's application with respect to distributing the net proceeds from the sale of the Meshers Road Property.

SWORN BEFORE ME at Edmonton,
Alberta, this 19th day of November, 2014.



Commission of Oaths in and for the
Province of Alberta

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John Kenneth Purdy

CONAN J. TAYLOR
Barrister and Solicitor



PROVINCIAL COURT OF ALBERTA
(CIVIL)

PAGE 1 OF 1

Action No:
P1190303947

EXHIBIT 'A'

Plaintiff(s)

(Defendant By Counterclaim)

Defendant(s)

(Plaintiff By Counterclaim)

- and -

VASQUEZ, VERONICA
BENITEZ, JOSE

HALF MOON LAKE RESORT LTD.

CERTIFICATE OF JUDGMENT

In a claim filed in the Civil Division of the Provincial Court of Alberta,
judgment was entered on the NINETEENTH day of JUNE, 2012, at EDMONTON,
ALBERTA

In favour of the PLAINTIFF(S)
For the sum of \$4427.96
Interest of \$51.31
and costs of \$622.75

Totalling \$5102.02
=====

In favour of the DEFENDANT(S)
For the sum of \$0.00
Interest of \$0.00
and costs of \$0.00

Totalling \$0.00
=====

Being a net judgment of \$5102.02 in favour of the Plaintiff(s).

Defendant(s) not having appeared at the hearing.

Dispute note and counterclaim struck.

This is Exhibit - A - referred to in the
Affidavit of
John Kenneth Purdy
Sworn before me this 19th day
of September A.D., 20 14
[Signature]
A Commissioner for Oaths
in and for the Province of Alberta

CONAN J. TAYLOR
Barrister and Solicitor

DATED this 21ST day of JUNE, 2012
at EDMONTON, ALBERTA

[Signature]
Clerk of the Provincial Court

Certified copy of the original
Certificate of Judgment

Date _____

Clerk of the Provincial Court

Provincial Court of Alberta
(Civil)

Action No.

P1190303947

Veronica Vasquez and Jose Benitez

Plaintiff(s)

and

Half Moon Lake Resort Ltd.

Defendant(s)

Civil Claim

The Plaintiff Claims from the Defendant \$ \$4,585.46

and costs of this action.

The Claim arose at Edmonton, Alberta on or about September 2, 2011

The reasons for the Claim are:

On May 15, 2011 we paid Half Moon Lake Resort (HMLR) \$4,079.25 dollars for the use of their site 12B for the summer season of 2011. As seasonal renters, the rental fee includes full hook-ups, power, 30 amp, water, and sewer. The water was never connected; because of this we were not able to use the facilities for the months of May and June.

On June 17th HMLR sent an official notice informing that the resort was closed due to a court order issued by Alberta Health Services and we were asked to make arrangements to leave the resort until further notification. When we asked HMLR if there was going to be some discount for failure to provide the service, they said we had to sue the city as it was their decision to close the resort.

HMLR did not take responsibilities for not providing this service and was not willing to give us our money back. On July 9th, 2011 HMLR was still closed so we decided to leave the site. We requested full refund but HMLR did not reply our letter which gave them July 15th for full refund.

Due to the fact that we have to move our RV trailer to a different location, we were forced to incur in several extra expenses. These expenses have been added to the total amount above.

I will be calling witnesses.

I abandon that part of my Claim that exceeds the financial jurisdiction of this Court.

I understand and agree that I cannot recover in this Court or any other Court the part of my Claim that is abandoned.

The Plaintiff's Address for service is:

#442, 10403-122 Street City Province Postal Code Res. Phone Bus. Phone
Edmonton AB T5N 4C1 780 454 4223 780 644 6401

The Defendant's Address for service is:

11617-106 Ave. City Province Postal Code Res. Phone Bus. Phone
Edmonton AB T5H 3L7 780 922 3045

The Defendant's Address for service is:

City Province Postal Code Res. Phone Bus. Phone

Dated September 2, 2011

at Edmonton, Alberta

Signature of Plaintiff / Agent / Solicitor

Veronica Vasquez
Print Name

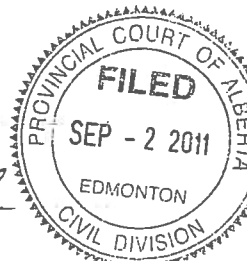
The Court's Address is:

Provincial Court of Alberta (Civil)
Main Floor, Law Courts
1A Sir Winston Churchill Square
97 Street & 102A Avenue
Edmonton, AB T5J 0R2
Telephone: 780-422-2508 Fax: 780-427-4348
Website address: www.albertacourts.ab.ca

Issued by the Provincial Court of Alberta

on SEP - 2 2011

Mary O'Sullivan
Clerk of the Provincial Court



Provincial Court of Alberta
(Civil)

Action No.
P1190303947

For office use only

FILED BY FAX

SEP 16 2011

THE PROVINCIAL COURT
OF ALBERTA
CIVIL DIVISION
EDMONTON

Received at 130 a.m.
(P.M.)

Plaintiff
✓ Veronica Vasquez and Jose Benitez

and
X Half Moon Lake Resort Ltd.

Defendant

Dispute Note
on behalf of the following parties:

1. I dispute the Plaintiff's Civil Claim for the following reasons:

THE Halfmoon Lake Resort 2011 Seasonal lease Agreement
#6 "Renters must agree to abide By all Resort Rules"
Signed By Veronica Vasquez
IN Resort Rules #5 "NO Refunds Under any Circumstances only
IN-House Credits". We offered Veronica a IN House credit for
time lost. We have a NO Refund policy on our website, posted all
over the Resort: Office, in Park Rules and everyone is told
at time of purchase

2. I Counterclaim or Claim a set-off for \$ 4165.00, for the following reasons:

Clean-up of site and late fees
on Halfmoon Lake Resort LTD
2011 Seasonal lease agreement Rule #1 "you are responsible
for the upkeep of your site including mowing. If your site
Requires extra stuff to clean or mow it, you will be charged an
hourly Rate of 50.00 per hour with a one hour minimum.

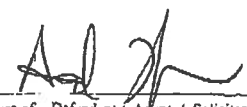
I will be calling _____ witnesses.

☐ I abandon that part of my Counterclaim that exceeds the financial jurisdiction of this Court
I understand and agree that I cannot recover in this Court or in any other Court the part of my Counterclaim that is abandoned.

3. My address for service is:

City Province Postal Code Res. Phone Bus. Phone
21524 TWP RD 520 Sherwood Park AB T7E 1E5 780 297 5558 780 922-3045

Dated Sept 16, 2011
at Sherwood Park, Alberta


Signature of Defendant / Agent / Solicitor
Hazel Thompson
Print Name

CLERK OF THE COURT - COUNTER PROCEDURE RECORD PRINT

ACTION NO:	P1190303947	VASQUEZ, VERONICA BENITEZ, JOSE	PLT PLT	VS HALF MOON LAKE RESORT LT DEF	
ACTIVITY DESCRIPTION		LITIGANTS HEARING DATE & TYPE	AMOUNT RESULT	EXPLANATION APPLICATION	JUSTICE/MASTER
CIVIL CLAIM DEBT & DAMAGE			\$4,585		DATE FILED
DISPUTE NOTE		HALF MOON LAKE RESORT LT			02SEP2011 PLT
COUNTERCLAIM		CONTHALF MOON LAKE RESORT LT VASQUEZ, VERONICA BENITEZ, JOSE	\$465		16SEP2011 DEF
MEDIATION LETTER - PCC		06DEC2011 PCM	UNRES	2 FL MED/CNTR WEST	17OCT2011 CLK
REQUEST FOR TRIAL DATE		HALF MOON LAKE RESORT LT			06DEC2011 PLT
NOT. COMPLETION MEDIATION					12DEC2011 CLK
NOTICE OF HEARING, TRIAL		19JUN2012 TRA	HRDEX	DDA \$4585.46 TR & CC	25JAN2012 CLK
CERT. JUDGMENT (COURT AP)		HALF MOON LAKE RESORT LT	\$5,102		21JUN2012 CLK

K. HAYMOUR, P.C.J.

*** END OF ACTIVITIES ***
*****END OF REPORT*****

CLERK OF THE COURT - COUNTER INDEX SEARCH BY NAME - PROVINCE WIDE

SEARCH : LAST/COMPANY NAME: VASQUEZ COMPANY:
CRITERIA : FIRST NAME:VERONICA INITIAL:
NAME TYPE: P JURISDICTION P VS:

REPORT COMMENT :

SELECT ALL FILES : Y

SELECT BY FILE # : N STARTING: 79 ENDING: 14

STARTING DOCUMENT	LAST STATUS DATE	LAST STATUS DESCRIPTION	PREVIOUS COURT
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ACTION NO: P1190303947	VASQUEZ, VERONICA	* HALF MOON LAKE RESORT LT	
CIVIL CLAIM DEBT & DAMAGE	21JUN2012	CERT. JUDGMENT (COURT AP)	03

*****END OF REPORT*****