



No. S-236214  
Vancouver Registry

*In the Supreme Court of British Columbia*

Between:

1392752 B.C. Ltd.

Petitioner

And:

Skeena Sawmills Ltd.  
Skeena Bioenergy Ltd.  
ROC Holdings Ltd.

Respondents

**APPLICATION RESPONSE**

**Application Response of:** Delta Cedar Specialties Ltd. (the "**Application Respondent**" or "**Delta Cedar**")

THIS IS A RESPONSE TO the Notice of Application of Receiver Alvarez & Marsal Canada Inc. filed February 29, 2024 for an order directing garnisheed funds to be paid to counsel for the Receiver (the "**Garnishment Application**").

The Application Respondent estimates that the Garnishment Application will take 10 minutes.

**Part 1: ORDERS CONSENTED TO**

The application respondent consents to the granting of the orders set out in the following paragraphs of Part 1 of the Garnishment Application on the following terms: **ALL**

**Part 2: ORDERS OPPOSED**

The application respondent opposes the granting of the orders set out in paragraphs **NONE** of Part 1 of the Garnishment Application.

**Part 3: ORDERS ON WHICH NO POSITION IS TAKEN**

The application respondent takes no position on the granting of the orders set out in paragraphs **NOT APPLICABLE** of Part 1 of the Garnishment Application.

**Part 4: FACTUAL BASIS**

1. **NOT APPLICABLE.**

**Part 5: LEGAL BASIS**


1. Delta Cedar agrees that the garnisheed funds that are the subject-matter of this application should be remitted to the Receiver for ultimate distribution to the creditors of Respondents in accordance with their lawful priorities in this receivership proceeding.

**Part 6: MATERIAL TO BE RELIED ON**

1. NONE

- ☒ The application respondent has filed in this proceeding a document that contains the application respondent's address for service.
- ☐ The application respondent has not filed in this proceeding a document that contains an address for service. The application respondent's ADDRESS FOR SERVICE is:

Dated: March 6, 2024

  
 Signature of lawyer for application  
 respondent  
 Francis Lamer

This **APPLICATION RESPONSE** was prepared by the law firm of Kornfeld LLP whose place of business is 1100-505 Burrard Street, Vancouver, BC, V7X 1M5 Tel: 604-331-8300.