

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 *CANADA BUSINESS CORPORATIONS ACT*
R.S.C. 1985, c. C-44, as amended

AND

IN THE MATTER OF NORTH AMERICAN TUNGSTEN CORPORATION LTD.

PETITIONER

APPLICATION RESPONSE

Application response of: **Wolfram Bergbau and Hütten AG** ("WBH"), (the "application respondent")

THIS IS A RESPONSE TO the Notice of Application of the Government of the Northwest Territories ("GNWT") dated November 6, 2015 (the "notice of application")

Part 1: ORDERS CONSENTED TO

The application respondent consents to the granting of the orders set out in **NIL** of Part 1 of the notice of application.

Part 2: ORDERS OPPOSED

The application respondent opposes the granting of **ALL** the orders set out in Part 1 of the notice of application.

Part 3: ORDERS ON WHICH NO POSITION IS TAKEN

The application respondent takes no position on the granting of **NIL** orders set out in Part 1 of the notice of application.

Part 4: FACTUAL BASIS

1. WBH adopts and relies on the factual basis referred to in the application response of Global Tungsten & Powders Corp. ("GTP").

Part 5: LEGAL BASIS

1. *Supreme Court Civil Rules*; and

2. *Companies' Creditors Arrangement Act*, R.S.C., 1985, c. C-36.
3. WBH adopts and relies on the legal basis referred to in the application response of GTP.

Part 6: MATERIAL TO BE RELIED ON

1. Affidavit #1 of Steffen Schmidt, made July 7, 2015;
2. Affidavit #2 of Steffen Schmidt, made November 16, 2015;
3. The material referred to and relied on in the application response of GTP.
4. The pleadings and other materials filed herein and such further and other materials as counsel may advise and this honourable court may permit.

The application respondent agrees with the time estimate of the Applicant.

The application respondent has filed in this proceeding a document that contains the applications respondent's address for service.

Dated: November 16, 2015


Signature of

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Application Respondent

Lawyer for Application Respondent

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