

**Via E-Mail - jmllee@mltaikins.com**

June 19, 2020

MLT Aikins LLP  
1500 - 410 22nd Street E.  
Saskatoon, SK S7K 5T6

**Attention: Jeff Lee, Q.C.**

**Re: In the matter of a plan of compromise or arrangement of 101098672 Saskatchewan Ltd., Morris Industries Ltd., Morris Sales and Service Ltd., Contour Realty Inc., and Morris Industries (USA) Inc.  
Action No. 1884 of 2019**

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As you are aware, we act on behalf of Bank of Montreal ("**BMO**"), the Interim Lender and senior secured creditor in these proceedings. We write further to our letter of June 2, 2020 which communicated our client's intention to make an Application on June 26, 2020 to lift the stay to permit BMO to subsequently apply for a Bankruptcy Order in respect of the debtor companies in these proceedings (the "**Lift Stay Application**").

We write to update you in respect of our anticipated timing for the Lift Stay Application: we will not be scheduling the Lift Stay Application for June 26, 2020, but rather we expect to schedule for a later date.

We confirm that BMO continues to support the proposed sale transaction described in paragraph 22 of the Sixth Monitor's Report and proposes to schedule the hearing of its Application for Bankruptcy Order subsequent to the closing of that sale transaction.

Yours truly,

BURNET, DUCKWORTH & PALMER LLP



David LeGeyt

DLG/agt

cc: Service List attached  
Sandy Hayer, BMO - via email (sandy.hayer@bmo.com)

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**BD&P**

COURT FILE NUMBER QB No. 1884 of 2019

COURT OF QUEEN'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE SASKATOON

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

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF 101098672 SASKATCHEWAN LTD., MORRIS INDUSTRIES LTD., MORRIS SALES and SERVICE LTD., CONTOUR REALTY INC., and MORRIS INDUSTRIES (USA) INC.

**SERVICE LIST**

*Revised May 22, 2020*

| NAME, ADDRESS, EMAIL ADDRESS, and FAX NUMBER                                                                                                                                                                                                                                                                                                                                                                               | COUNSEL FOR (OR ON BEHALF OF)                                                                                                                                                                              |
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| <b>McDougall Gauley LLP</b><br><br>Attention:<br><br>Ian A. Sutherland<br>Phone: (306) 665-5417<br>FAX: (306) 664-4431<br>Email: isutherland@mcdougallgauley.com<br><br>Craig Frith<br>Phone: (306) 665-5432<br>FAX: (306) 664-4431<br>Email: cfrith@mcdougallgauley.com                                                                                                                                                   | <b>The Morris Group</b><br><br>Attention:<br><br>Timothy Lee<br>Email: tlee@kirchnergroup.com<br><br>Casey Davis<br>Email: casey@kc5holdings.com<br><br>Kevin Adair<br>Email: kadair@morris-industries.com |
| <b>Burnet, Duckworth &amp; Palmer LLP</b><br><br>Attention:<br><br>David LeGeyt<br>Phone: (403) 260-0210<br>Email: dlegeyt@bdplaw.com<br><br>Ryan Algar<br>Phone: (403)260-0126<br>Email: ralgar@bdplaw.com<br><br><b>The W Law Group</b><br><br>Attention:<br><br>Michelle Tobin<br>Phone: (306) 244-2242<br>Email: mtobin@wlawgroup.com<br><br>Michael Russell<br>Phone: (306) 244-2242<br>Email: mrussell@wlawgroup.com | <b>Bank of Montreal</b><br><br>Attention:<br><br>Sandy Hayer<br>Email: Sandy.hayer@bmo.com                                                                                                                 |

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| <b>MLT Aikins LLP</b><br><br>Attention:<br><br>Jeff Lee, Q.C.<br>Phone: (306) 975-7136<br>Fax: (306) 975-7145<br>Email: jmlee@mltaikins.com<br><br>Ryan Zahara<br>Phone: (403) 693-5420<br>Fax: (403) 508-4349<br>Email: rzahara@mltaikins.com<br><br>Paul Olfert<br>Phone: (306) 956-6970<br>Email: polfert@mltaikins.com | <b>Alvarez &amp; Marsal Canada Inc.</b><br><br>Attention:<br><br>Orest Konowalchuk<br>Phone: (403) 538-4736<br>Email: okonowalchuk@alvarezandmarsal.com<br><br>Chad Artem<br>Phone: (403) 538-7518<br>Email: cartem@alvarezandmarsal.com<br><br>Marianna Lee<br>Phone:<br>Email: Marianna.lee@alvarezandmarsal.com |
| <b>McCarthy Tetrault LLP</b><br><br>Attention:<br><br>Walker W. MacLeod<br>Phone: (403) 260-3710<br>Email: wmacleod@mccarthy.ca                                                                                                                                                                                            | <b>Avrio Subordinated Debt Limited Partnership II and 2040842 Alberta Ltd.</b>                                                                                                                                                                                                                                     |
| <b>Gowling WLG</b><br><br>Attention:<br><br>Caireen E. Hanert<br>Phone: (403) 298-1992<br>Email: caireen.hanert@gowlingwlg.com                                                                                                                                                                                             | <b>Trumpf Finance, A Unit of SG Equipment</b><br>Finance USA Corp.<br>480 Washington Blvd 24 <sup>th</sup> Floor<br>Jersey City NJ USA<br>07310                                                                                                                                                                    |
| <b>Cassels Brock &amp; Blackwell LLP</b><br><br>Attention:<br><br>Mary I.A. Buttery, Q.C.<br>Phone: (604) 691 6118<br>Email: mbuttery@cassels.com<br><br>Lance Williams<br>Phone: (604) 691-6112<br>Email: lwilliams@cassels.com<br><br>Sue Danielisz<br>Phone: (778) 372-6779<br>Email: sdanielisz@cassels.com            | <b>De Lage Landen Financial Services Canada Inc.</b><br>#600-2103 11 <sup>th</sup> Avenue<br>Regina, SK S4P 3Z8                                                                                                                                                                                                    |

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| <b>Miller Thomson LLP</b><br><br>Attention:<br><br>Kevin W. Plowman<br>Phone: (403) 298-2411<br>Email: kplowman@millerthomson.com                                                  | <b>Kubota Canada Ltd.</b><br>1500-1874 Scarth Street<br>Regina, SK S4P 4E9                                                                                                                                                          |
| <b>Miller Thomson LLP</b><br><br>Attention:<br><br>Rick M. Van Beselaere, Q.C.<br>Phone: (306) 347-8316<br>Email: rvanbeselaere@millerthomson.com                                  | <b>Farm Credit Canada</b>                                                                                                                                                                                                           |
| <b>Cervus Equipment, Head Office</b><br>5201 333 96 Ave NE<br>Calgary AB T3K 0S3<br><br>Attention:<br><br>Devin P. Mylrea, Corporate Counsel<br>Email: dmylrea@cervusequipment.com | <b>Cervus Equipment Corporation</b><br><br><b>Cervus Ag Equipment LP. By its general partner, Cervus Ag Equipment Ltd.</b><br><br><b>Cervus Contractors Equipment LP. By its general partner, Cervus Contractors Equipment Ltd.</b> |
| <b>Thompson Dorfman Sweatman</b><br><br>Attention:<br><br>Allan L.V. Stewart<br>Phone:<br>Email: alvs@tdslaw.com                                                                   | <b>Buhler Trading Inc.</b><br>1260 Clarence Avenue<br>Winnipeg, MB R3T 1T2                                                                                                                                                          |
| <b>Fasken Martineau DuMoulin LLP</b><br>800 Victoria Square, Suite 3700<br>Montréal Quebec H4Z 1E9<br><br>Attention:<br><br>Luc Beliveau<br>Email: lbeliveau@fasken.com            | <b>Timothy Lee</b><br>Email: tlee@kirchnergroup.com                                                                                                                                                                                 |
| <b>Ronald Ade Law Corp.</b><br>102 1015 Wilkes Ave<br>Winnipeg MB R3P 2R8<br><br>Attention: Ronald Ade<br>Email: ron@ronade.ca                                                     | <b>Intergraphies Decal Ltd.</b><br>180 de Baets St<br>Winnipeg MB R2J 3W6<br><br>Attention: Alan Dewit                                                                                                                              |
| <b>Canham Miller LLP</b><br>116 Albert St<br>Regina SK S4R 2N2<br><br>Attention: Dale A. Canham<br>Email: dcanham.drc@sasktel.net                                                  | <b>MF Enterprises Ltd.</b><br>5909 Koep Ave<br>Regina SK S4X 0H5                                                                                                                                                                    |

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| <b>BLG</b><br>1900 520 3 <sup>rd</sup> Ave SW<br>Centennial Place East Tower<br>Calgary AB T2P 0R3<br><br>Attention: Jack Maslen<br>Email: jmaslen@blg.com | <b>Western Equipment Dealers Association</b>                                                                                                                     |
| <b>NFI Group, Legal</b><br>711 Kernaghan<br>Winnipeg MB R2C 3T4<br><br>Attention: Kathryn Hordienko<br>Email: Kathryn.hordienko@nfigroup.com               | <b>Carfair Composites Inc.</b><br>692 Mission St<br>Winnipeg MB R2J 0A3                                                                                          |
| <b>MLT Aikins LLP</b><br>1500 410 22 <sup>nd</sup> St E<br>Saskatoon SK S7K 5T6<br><br>Attention: Alain Gaucher, Q.C.<br>Email: agaucher@mltaikins.com     | <b>Western Sales Ltd.</b><br>405 Hwy 7 W<br>Box 968<br>Rosetown SK S0L 2V0<br><br>Attention: Ashley Kampen<br>Email: Ashley.kampen@westernsales.ca               |
| <b>SIRRS LLP</b><br>522 51 Ave<br>Wetaskiwin AB T9A 0V4<br><br>Attention: Miles Cymbaluk<br>Email: m.cymbaluk@sirrsllp.com                                 | <b>PJL Ag Services Assembly Depot</b><br>RR 2 Site 401 Box 5<br>Wataskiwin AB T9A 1W9<br><br>Attention: Paul J. Labert<br>Email: pjlagservices@gmail.com         |
| <b>Burgess Law Office</b><br>51 Main St PO Box 65<br>Minnedosa MB R0J 1E0<br><br>Attention: John W. Burgess<br>Email: minnedosa@burgesslawoffice.net       | <b>Town of Minnedosa</b><br>103 Main St S PO Box 426<br>Minnedosa MB R0J 1E0                                                                                     |
| <b>Leland Kimpinski LLP</b><br>336 6 <sup>th</sup> Ave N<br>Saskatoon SK S7K 2S5<br><br>Attention: Ryan A. Pederson<br>Email: rpederson@lelandlaw.ca       | <b>Polytubes 2009 Inc.</b>                                                                                                                                       |
| <b>Bridges &amp; Company LLP</b><br>1329 3 <sup>rd</sup> St<br>Esevan SK S4A 0S1<br><br>Attention: Robert Nicolay<br>Email: rnicolay@bridgeslaw.ca         | <b>Titan Marketing Services, LLC</b><br>2701 Spruce St<br>Quincy IL USA 62301<br><br>Attention: Michael G. Troyanovich<br>Email: mike.troyanovich@titan-intl.com |

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| <b>Parlee McLaws LLP</b><br>1700 10175 101 <sup>st</sup> St NW<br>Edmonton AB T5J 0H3<br><br>Attention: Bryan P. Maruyama<br>Email: bmaruyama@parlee.com                                    | <b>Wells Fargo Capital Finance Corporation<br/>Canada</b><br>1290 Central Parkway West Suite 1100<br>Mississauga ON L5C 4R3<br><br>Attention; Rick Kanabar, Vice President<br>Email: rick.kanabar@wellsfargo.com |
| <b>Gerrand Rath Johnson LLP</b><br>700 1914 Hamilton St<br>Regina SK S4P 3N6<br><br>Attention: Russell Hart<br>Email: rhart@grj.ca<br><br>Attention: Barton Soroka<br>Email: bsoroka@grj.ca | <b>S3 Manufacturing Inc.</b><br><br>and<br><br><b>S3 Wireform Inc.</b>                                                                                                                                           |
| <b>Miller Thomson LLP</b><br>300 15 23 <sup>rd</sup> St E<br>Saskatoon SK S7H 0H6<br><br>Attention: David G. Gerecke, Q.C.<br>Email: dgerecke@millerthomson.com                             | <b>Ben Voss</b><br>310 Lansdowne Ave<br>Saskatoon SK S7N 1C7                                                                                                                                                     |
| <b>Kanuka Thuringer LLP</b><br>1400-2500 Victoria Avenue<br>Regina SK S4P 2A3<br><br>Attention: James Ehmann, Q.C. / Alex Shalashniy<br>Email: jehmann@ktllp.ca , ashalashniy@ktllp.ca      | <b>1742009 Alberta Inc. dba Agriterra Equipment</b><br>28007 Highway 16<br>Stony Plain AB T72 1Z1                                                                                                                |
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| <b>Meighen Haddad LLP</b><br>110-11 <sup>th</sup> Street<br>Brandon MB R7A 4J4<br><br>Attention: Stacy Senkbeil<br>Email: ssenkbeil@mhlaw.ca                                                | <b>Travis Hunter</b><br>Box 902<br>Virden MB R0M 2C0<br><br>Email: hunterth@rfnw.com                                                                                                                             |

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| <b>Wells Fargo</b><br>Commercial Distribution Finance<br>1290 Central Pkwy W Suite 1100<br>Mississauga ON L5C 4R3                                                                                                   | <b>ISC Mailing Address</b><br>Wells Fargo Commercial Distribution Finance<br>1500-1874 Scarth Street<br>Regina, SK S4P 4E9<br><br>Attention: To Whom It May Concern<br><br><b>ISC Physical Address</b><br>22 Adelaide Street West<br>Suite 2200<br>Toronto, ON M5H 4E3 |
| <b>Truck Saver Service (Yorkton) Ltd.</b><br>PO Box 909<br>Yorkton SK S3N 2X1<br><br>Attention: Haley Unyi<br>Email: haley@potzus.com                                                                               | <b>RAM Industries Inc.</b><br>33 York Road East<br>Yorkton, SK S3N 3Z4<br><br>Attention: Willard Yaremko<br>Email: willard@ramindustries.com                                                                                                                           |
| <b>The Carlstar Group</b><br>23 Windham Blvd.<br>Aiken, SC 29805<br><br>Attention:<br><br>Jean Guillaume<br>Email: jean.guillaume@carlstargroup.com<br><br>Randy O'Banion<br>Email: randy.obanion@carlstargroup.com | <b>Terhorst Manufacturing Co.</b><br>615 E Burdick Expy<br>Minot ND USA<br>58701<br><br>Attention:<br><br>Dave Knutson<br>Email: dlknutson@srt.com                                                                                                                     |
| <b>619020 Saskatchewan Ltd.</b><br>Box 280 Hwy 6<br>Raymore, SK S0A 3J0<br><br>Attention: Kim Filson<br>Email: kfilson@raymorenewholland.com                                                                        | <b>Virtus Group</b><br>200 – 157 2 <sup>nd</sup> Avenue North<br>Saskatoon, SK S7K 2A9<br><br>Shelley Szakacs<br>Email: sszakacs@virtusgroup.ca                                                                                                                        |
| <b>Marmon/Keystone Canada Inc.</b><br>1220 Heritage Road<br>Burlington, ON L7L 4X9<br><br>Attention: Richard Deeks<br>Email: rdeeks@mkcanada.com                                                                    | <b>Dirven Enterprises Inc. o/a Absolute Door Services</b><br>PO Box 600<br>Churchbridge, SK S0A 0M0<br><br>Attention: Debbie Dirven<br>Email: Debbie.absolute@sasktel.net                                                                                              |
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| <b>Cloverdale Paint Inc.</b><br>400 2630 Croydon Drive<br>Surrey, BC V3Z 6T3<br><br>Attention: Tami Prosser<br>Email: credit@cloverdalepaint.com                                     | <b>Point West Technologies Ltd.</b><br>60 De Baets St<br>Winnipeg MB R2J 3S9<br><br>Attention: Greg Borsboom<br>Email: gregb@pointswesttechnologies.com                  |
| <b>Klassen Manufacturing Limited</b><br>60 Burnett Ave<br>Winnipeg MB R2G 1C1<br><br>Attention: Darryl Pauls<br>Email: Darryl@klassens.ca                                            | <b>Coface North America Insurance Company</b><br>650 College Rd E Suite 2005<br>Princeton NJ USA<br>08540<br><br>Attention: Amy Schmidt<br>Email: Amy.schmidt@coface.com |
| <b>City of Yorkton</b><br>PO Box 400<br>Yorkton SK S3N 2W3<br><br>Attention: City Manager's Office<br>Email: citymanager@yorkton.ca                                                  | <b>Nortic Machining &amp; Manufacturing Ltd.</b><br>PO Box 60<br>Beausejour MB R0E 0C0<br><br>Attention: Jacquie Baranoski<br>Email: bnbarano@mymts.net                  |
| <b>Manitoba Finance – Taxation</b><br>101 401 York Ave<br>Winnipeg MB R3C 0P8<br><br>Attention: Julien Forest, Collections Officer<br>Email: julien.forest@gov.mb.ca                 | <b>Jespar Inc.</b><br>PO Box 873<br>Virden MB R0M 2C0<br><br>Attention: Dennis Sparks<br>Email: dsparks331@gmail.com                                                     |
| <b>Western Economic Diversification Canada</b><br>PO Box 2025 Suite 115 101 2 <sup>nd</sup> St E<br>Saskatoon SK S7K 3S7<br><br>Attention: Jason Lund<br>Email: Jason.lund@canada.ca | <b>Jacqueline Dee Travis</b><br>101 404 Cartwright St<br>Saskatoon SK S7T 0W6<br><br>Email: Jacquie.freewaydelivery@sasktel.net                                          |
| <b>JCA Electronics</b><br>118 King Edward St E<br>Winnipeg MB R3H 0N8<br><br>Attention: John Charles Anderson<br>Email: jca@jcaelectronics.ca                                        | <b>Dean V. Friesen</b><br>255 East Place<br>Saskatoon SK S7S 2Y2<br><br>Email: dean@objectified.com                                                                      |
| <b>Lethbridge Iron Works</b><br>B720 32 <sup>nd</sup> St N<br>Lethbridge AB T1H 5K5<br><br>Attention:<br><br>Dylan Davies<br>Email: Dylan@lethiron.com                               |                                                                                                                                                                          |