

IN THE COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL DISTRICT OF CALGARY
IN BANKRUPTCY AND INSOLVENCY

IN THE MATTER OF THE PROPOSAL OF
844712 ALBERTA LTD.

AND IN THE MATTER OF THE PROPOSAL OF
INVERIDGE DEVELOPMENT CORP.

NOTICE OF MOTION

TAKE NOTICE that an application will be made before the Honourable Justice Wilkins on Friday, the 27th day of October, 2006 at the Court House in the City of Calgary, in the Province of Alberta at the hour of at 1:00 o'clock in the afternoon or so soon thereafter as counsel may be heard for an Order:

- (a) Deeming service of the application materials to be good and sufficient;
- (b) Consolidating the within proceedings;
- (c) Approving debtor in possession financing for the debtors with respect to the proceedings;
- (d) Providing directions for service to creditors; and
- (e) Granting such further or other relief as counsel may seek and this Honourable Court deem just.

AND FURTHER TAKE NOTICE that the grounds of the application are as follows:

- (a) The debtors in the respective proceedings are related companies with identical creditors and overlapping assets. The debtor Inveridge Development Corp. is a developer of real estate which raised funds from numerous creditors with respect to a proposed development in Invermere, British Columbia. The debtor 844712 Alberta Ltd. owns real property on which the development was to occur and

which stood as security for the investment of a creditors from whom Inveridge Development Corp. raised funds.

- (b) The debtors require interim funding for the carrying on of business and administrative costs during the period of restructuring contemplated in these proceedings. The debtors have agreed, subject to approval of this Honourable Court, for debtor in possession financing to be provided by 1245174 Alberta Ltd.;
- (c) The debtors require directions on service to a large number of mortgagees, as service would normally be made to IDC and a related company as mortgage managers acting for such mortgagees; and
- (d) Such further and other grounds as counsel may advise.

AND FURTHER TAKE NOTICE that in support of the application the applicant will rely upon the Affidavit of Dennis Besler, filed, the *Rules of Court* (Alberta), the *Bankruptcy and Insolvency Act* (Canada) and such further and other material as counsel may present.

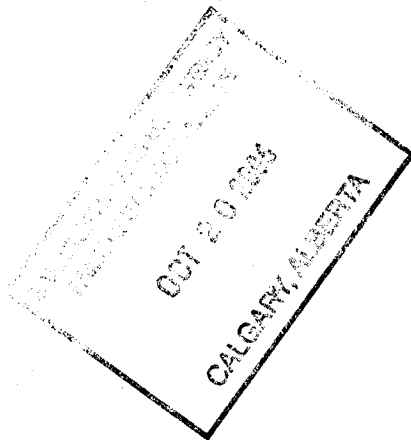
DATED at the City of Calgary, in the Province of Alberta, this 20th day of October, 2006.

BURNET, DUCKWORTH & PALMER LLP

Per: 

Douglas S. Nishimura

TO: Clerk of the Court



Court/Estate No. 25-093465

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File No. 63592-1
