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Our File: 74909-14

**By Hand Delivery
and Via E-Mail (CommercialCoordinator.QBEdmonton@albertacourts.ca)**

April 4, 2022

Court of Queen's Bench of Alberta
Law Courts
1A Sir Winston Churchill Square
Edmonton AB T5J 0R2

Attention: The Honourable Madam Justice Burns

Your Ladyship:

**Re: In the Matter of the Notice of Intention to make a proposal of Vertex Downhole Ltd.
Estate No. 25-2802560**

We are counsel to Vertex Downhole Ltd. ("**Vertex**").

In connection with Vertex's Application before your Ladyship via Webex video conference on Thursday, April 14, 2022 at 2:00pm to 4:30pm, enclosed for your reference following unfiled materials we intend to rely:

1. Application with, draft from of Order attached;
2. Affidavit No. 1 of Craig Flint, sworn February 22, 2022, filed;
3. Affidavit No. 2 of Craig Flint, sworn April 4, 2022;
4. Bench Brief of Vertex; and
5. Book of Authorities.

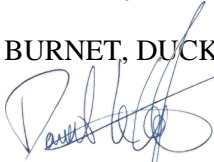
These materials have been submitted for filing, and proof of filing will be circulated to the Service List in due course. Hard copies of the above materials will be delivered to your office.

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We trust the foregoing to be in order, however, please do not hesitate to contact me with any questions.

Yours truly,

BURNET, DUCKWORTH & PALMER LLP



David LeGeyt
Partner

DLG/agt
Enclosures

cc: Attached Service List (without enclosures)

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF:

VERTEX DOWNHOLE LTD.

Estate no. 25-2802560

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS DOCUMENT

Burnet, Duckworth & Palmer LLP
2400, 525 – 8 Avenue SW
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File No. 74909-14

SERVICE LIST

Updated: April 4, 2022

<p>Burnet, Duckworth & Palmer LLP 2400, 525 – 8 Avenue SW Calgary, AB T2P 1G1 Attention: David LeGeyt Ryan Algar Daisy Dai Email: dlegeyt@bdplaw.com ralgar@bdplaw.com ddai@bdplaw.com</p> <p><i>Counsel for Vertex Downhole Ltd.</i></p>	<p>Fasken Martineau DuMoulin LLP 550 Burrard Street, Suite 2900 Vancouver, BC V6C 0A3 Attention: Kibben Jackson Email: kjackson@fasken.com</p> <p><i>Counsel for HSBC</i></p>
<p>MNP Ltd. 1500, 640 – 5 Avenue SW Calgary, AB T2P 3G4 Attention: Victor Kroeger Rick Anderson Email: Victor.Kroeger@mnp.ca rick.anderson@mnp.ca</p> <p><i>Proposal Trustee</i></p>	<p>Dentons Canada LLP 850 – 2 Street SW 15th floor, Bankers Court Calgary, AB T2P 0R8 Attention: Sam Gabor Email: sam.gabor@dentons.com</p> <p><i>Counsel to MNP Ltd., Proposal Trustee</i></p>