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Our File: 74909-14

**Via E-Mail**

April 4, 2022

**Attention: ATTACHED SERVICE LIST**

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

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

In connection with Vertex's Application before Honourable Madam Justice Burns via Webex video conference on Thursday, April 14, 2022 at 2:00pm to 4:30pm, enclosed for service are the following unfiled materials we intend to rely:

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

These materials have been submitted for filing, and proof of filing will be provided in due course. Please see the enclosed Webex Virtual Courtroom instructions for **Virtual Courtroom 86**, summarized as:

**Virtual Courtroom 86** has been assigned for the above noted matter:

Date: Thursday, April 14, 2022 at 2:00pm  
Style of Cause: ITMO Vertex Downhole Ltd; Estate No. 25-2802560  
Presiding Justice: Justice Burns

Virtual Courtroom Link:

<https://albertacourts.webex.com/meet/virtual.courtroom86>

11456316.1

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

**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

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