

June 15, 2016

Court File No: CV-13-10279-00CL

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Mr. Solman in behalf of Growthworks Canadian
WV Management Ltd
hereby says the Motion should be discharged.
This has nothing to do with whether a stay
should be granted. The CCAA requires a
Motion and there is no reason to terminate
this CCAA proceeding.

The affidavit of Mr. Levis and Mr. Solman's
submissions have to do with an alleged
sale of assets. This is not a reason not
to extend the stay of proceedings.

Mr. Solman has known for a considerable period
of time that the stay is required. Filing an
affidavit at the last moment is a way to
oppose the stay because it is on the basis of
an alleged impecunious deposit. Our examination
of Mr. Ross on these allegations would not assist
the issue of the need for a stay.

**ONTARIO
SUPERIOR COURT OF JUSTICE**

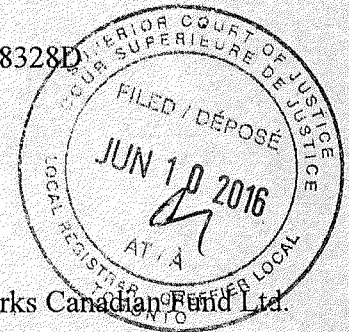
Proceeding commenced at Toronto

**MOTION RECORD OF THE APPLICANT
(RETURNABLE JUNE 15, 2016)**

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If Mr Simon's client thinks the CIAA proceedings should be ~~stay~~ dismissed, he has his remedies.

An stay is required. It is supported by the Monitor. An order is granted.
The affidavit of Mr. Lewis is to be sealed.

D. H. L.