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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ALASKA

In re TERCON INVESTMENTS LTD., Debtors in a Foreign Proceeding	CASE NO.: A13-00015-HAR In Chapter 15 [Lead Case of Jointly Administered Cases A13-00015 through A13-00025-HAR]
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RECEIVER’S MEMORANDUM RESPONDING TO DOCKET No. 14

FTI Consulting Canada Inc. (“the Receiver”), the Receiver appointed in *Dumas Holdings, Inc. Petitioner, v. Tercon Investments Ltd., et. al.*, Case No. S 128887 (“the Canadian Proceedings”) in the Supreme Court of British Columbia, Vancouver Registry, (“the Canadian Court”), responds as follows to this Court’s Order Denying Ex Parte Motion to Approve Canadian Vesting Order (the “Order”), Docket No. 14.

The Receiver did not intend that its Motion for Recognition and Approval of *Approval and Vesting Order*, Docket No. 10 (the “Vesting Motion”), be decided on an ex parte basis (Had the Receiver so intended, the Receiver would have done so explicitly, as with the Ex Parte Motion for Interim Stay, Docket No. 7). Instead, the Receiver intends, as suggested by the Order,

to notice the Vesting Motion¹ for a hearing on February 19, 2013, along with the recognition order and along with a Motion to Recognize and Approve *Distribution Order* (“Distribution Motion”) currently being filed. The Receiver is currently projecting a closing between February 20 and February 28, 2013, so there will be adequate time for the Vesting Motion and Distribution Motion to be ruled upon before the projected closing.

The Receiver, and the undersigned, apologize for any confusion.

DATED this January 22, 2013.

LAW OFFICES OF CABOT CHRISTIANSON, P.C.
Attorneys for FTI Consulting Canada Inc.

By: /s/ Cabot Christianson
Cabot Christianson

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 22, 2013, a true and correct copy of this memorandum was served by electronic means through the ECF system as indicated on the Notice of Electronic filing.

By: /s/ Margaret Stroble _____
Margaret Stroble

¹ Because the Order’s denial of the vesting order is limited to a denial to the extent that the motion seeks ex parte relief, the Receiver assumes that the Court did not intend that its denial of the motion would apply to a noticed-out motion.