

Q.B.G. No. 363 of 2008

CANADA )  
PROVINCE OF SASKATCHEWAN )

IN THE QUEEN'S BENCH  
JUDICIAL CENTRE OF SASKATOON

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,  
R.S.C. 1985, c. C-36

AND IN THE MATTER OF A PROPOSED PLAN OF ARRANGEMENT FOR THE  
CREDITORS OF STOMP PORK FARM LTD.

**EIGHTH AFFIDAVIT OF IVAN STOMP**

I, IVAN STOMP, of the District of Humboldt, in the Province of Saskatchewan, MAKE  
OATH AND SAY AS FOLLOWS:

1. I am the President and Chief Executive Officer of Stomp Pork Farm Ltd., the Applicant in these proceedings. As such I have personal knowledge of the facts and matters herein deposed to except where stated to be based on information and belief. Whereso stated, I verily believe the same to true.
2. Matters relating to the history of Stomp Pork Farm Ltd. ("Stomp"), its business operations, its indebtedness, and its insolvency have been set forth in detail in the Affidavit of Ivan Stomp, which was sworn by me in this matter on March 26, 2008.
3. That affidavit was sworn for the purposes of obtaining an initial order under the *Companies Creditors' Arrangement Act* (the "CCAA").
4. On March 27, 2008, this Honourable Court granted an Amended Ex Parte Initial

Order (the "Initial Order") under the CCAA. The stay of proceedings set forth in that Order has been extended three times, and is currently set to expire at 11:59 p.m. on Monday, June 30, 2008.

5. On June 20, 2008, this Honourable Court made an Order providing for a Claims Procedure to be established and administered by Stomp and by the Monitor. I was advised by the Monitor that progress has been made, and that all necessary notices will be sent prior to the deadline set out in that Order.
6. At the same time as counsel for Stomp has been preparing the Claims Procedure, work has continued on a Plan of Compromise and Arrangement.
7. Counsel advises, and I verily believe, that the plan is substantially complete, but that there are two outstanding issues which it would be advisable to resolve before presenting a plan for filing, and obtaining an Order for the Creditors' Meeting. These are the following:
  - (a) Discussions continue between FCC and NBC with respect to the final content of the Inter-Lender Agreement flowing out of the Restructuring Approval Order granted on May 28, 2008. Counsel advises that there is nothing contained in any of the drafts which have been circulated recently which would be of concern to Stomp. Rather, that the matters which remain to be sorted out are as between the two senior secured lenders. I am optimistic that this matter will be resolved within the next few days. Nevertheless, we consider it advisable to have this matter resolved before presenting the Plan; and
  - (b) Discussions have been undertaken with the Government of Saskatchewan, and with Cargill, with a view to determining their support for a Plan of Arrangement. These discussions are proceeding satisfactorily, but there remains one issue outstanding which will require some additional discussion (and possibly some redrafting of the Plan), in order to satisfy the concerns

which have been expressed during these discussions.

- 8. For this reason, I have instructed counsel for Stomp to seek further extension of the Stay of Proceedings to Friday, July 18, 2008, and to see another return date sometime before July 11 with a view to presenting the Plan of Arrangement, and a Creditors' Meeting Order for approval by this Honourable Court.
- 9. I make this affidavit in support of that application.

SWORN BEFORE ME at the City )  
 of Saskatoon, in the Province of )  
 Saskatchewan, this 25 day )  
 of June, 2008. )



\_\_\_\_\_  
 A COMMISSIONER FOR OATHS  
 in and for the Province of Saskatchewan.  
 My Commission expires: March 2009  
 Or BEING A SOLICITOR



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 IVAN STOMP

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