

IN THE COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL DISTRICT OF CALGARY

BETWEEN:

NATIONAL BANK OF CANADA

Plaintiff

- and -

DRIFTWOOD RESOURCES LTD. and GREEN

POINT RESOURCES LTD.

Defendants

NOTICE OF MOTION

TAKE NOTICE that an Application will be made by the Receiver/Manager, Meyers Norris Penny Limited (the "Receiver") herein before the Honourable Madam Justice C.A. Kent, in Chambers, at the Calgary Courts Centre in the City of Calgary, in the Province of Alberta, on Wednesday, the 27th day of January, 2010, at the hour of 9:00 o'clock in the forenoon, or so soon thereafter as counsel may be heard, for an Order:

1. Approving the sale of a portion of the assets of the Defendant to Drake Energy Ltd. and such vesting order that may be proposed by the Receiver as set out in the form attached as Schedule A hereto as may be amended.
2. Providing an order sealing the Agreement of Purchase and Sale between the Receiver and Drake Energy Ltd. until the closing of the sale has occurred.
3. Abridging the time for service of this Notice of Motion as may be required to deem service good and effective.
4. Such further and other relief as this Honourable Court may deem just.

AND FURTHER TAKE NOTICE that the grounds upon which the application will be made are as follows:

- 1 The sale proposed by the Receiver is in the best interests of the administration of the receivership and the stakeholders affected thereby; and
- 2 The relief requested is just, appropriate and in the best interests of the administration of the receivership estate.

AND FURTHER TAKE NOTICE that in support of such application the Receiver will rely on:

- (a) *The first report of the Receiver filed herein;*
- (b) *Bankruptcy and Insolvency Act;* and
- (c) Such further and other materials as counsel may advise.

AND FURTHER TAKE NOTICE that the Receiver will ask for all costs of and incidental thereto.

DATED at the City of Calgary, in the Province of Alberta, this 19th day of January, 2010.

Miles Davison LLP

Per: 

Solicitors for the Receiver

TO: Clerk of the Court

AND TO:

Borden Ladner Gervais LLP
1000 Canterra Tower
400 Third Avenue SW
Calgary, AB T2P 4H2

Meyers Norris Penny Limited
#7th Floor, 715 – 5th Avenue SW
Calgary, AB T2P 2X6

Attention: Mr. Verne Wood
Katherine Bujold

Macleod Dixon LLP
3700 Canterra Tower
400 – 3rd Avenue SW
Calgary, AB T2P 4H2

Vermillion Resources Ltd.
2800, 400 – 4 Avenue SW
Calgary, AB T2P 0J4

Encana Corporation
1800, 855 – 2nd Street SW
PO Box 2850
Calgary, AB T2P 2S5

Enermark Inc.
Suite 3000, 333 – 7 Avenue SW
Calgary, AB T2P 2Z1

Zargon Energy Trust
Suite 700, 333 – 5 Avenue SW
Calgary, AB T2P 3Y6

Direct Energy Resources
1000, 111 – 5 Avenue SW
Calgary, AB T2P 3Y6

Concept Compression
2325 20th Avenue NE
Calgary, AB T2E 8S4

Drake Pacific Enterprises Ltd.
#400, 505 – 8 Avenue SW
Calgary, AB T2P 1G2

RML Energy Inc.
#35 West Terrace Drive
Cochrane, AB T4C 1R5

RML Energy Inc.
400, 505 – 8 Avenue SW
Calgary, AB T2P 1G2

Action No.:0901-09579

IN THE COURT OF QUEEN'S BENCH
OF ALBERTA
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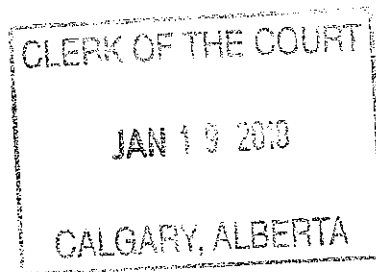
Plaintiff

-and-

**DRIFTWOOD RESOURCES LTD. and
GREEN POINT RESOURCES LTD.**

Defendants

NOTICE OF MOTION



MILES DAVISON LLP
Barristers & Solicitors
#1600, 205 – 5 Avenue SW
Calgary, AB T2P 2V7

Attention: Terry L. Czechowskyj
Telephone: (403) 298-0326
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File No.: 25881