

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.

**NOTICE OF MOTION**

TAKE NOTICE that an application will be made to the Honourable Madame Justice A.R. Rothery in Chambers at the Court House, 520 Spadina Crescent East, Saskatoon, Saskatchewan, on Friday, the 20th day of June, 2008, at 11:00 a.m. or so soon thereafter as counsel may be heard on behalf of Stomp Pork Farm Ltd., (hereinafter the "Applicant" or "Stomp or so soon thereafter as counsel may be heard on behalf of Stomp Pork Farm Ltd., (hereinafter the "Applicant" or "Stomp"), for an Order granting certain relief, pursuant to the provisions of sections 9, 10 and 11 of the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (the "CCAA"), Rules 441(3) and 441A of *The Rules of Court*, the Ex Parte Initial Order and the Amended Ex Parte Initial Order of the Honourable Madame Justice A.R. Rothery made March 27, 2008 (the "Initial Order"), as amended, and more particularly, paragraph 65 of the Initial Order, the Order to Amend Initial Order (Payment of US Creditors and Correction of Stay Period) made April 3, 2008 (the "US Creditors Order"), the Order to Amend Initial Order (Service of Initial Order on Creditors in the United States) made April 4, 2008 (the "US Service Order"), the Order made April 7, 2008 providing for a report from the Monitor respecting the allocation of DIP Financing (the "DIP Financing Allocation Report Order), the Order (Application for Extension Order and Leave to Secured Creditors to Serve Notices made April 22, 2008 (the "First Extension Order"), the Order made April 23, 2008 providing for the allocation of charges respecting the Interim DIP Facility and future DIP financing (the "DIP Allocation

Order), the Order (Application for Second Extension Order and Increase in Administration Charge (the “Second Extension Order”) Order (Application for Third Extension Order and Increase in Administration Charge) (the “Third Extension Order”), the Order (Fourth Extension Order and Order Approving Restructuring Agreement and Sale) (the “Restructuring Approval Order”), and pursuant to the inherent jurisdiction of the Court, for:

1. An Order that Stomp and the Monitor be directed to commence a claims procedure, whereby:
  - (a) the claims of those claiming to be Stomp’s creditors as at March 27, 2008, will prove those claims for the purposes of voting on and participating in any plan of rearrangement to be presented by Stomp;
  - (b) Disputed claims may be dealt with in a summary fashion; and
  - (c) Unproven claims will be barred, and precluded from voting upon and participating in any plan of arrangement to be presented by Stomp.
2. An Order providing that the professional fees of the Monitor, counsel to the Monitor, counsel to the Applicant and Prowis Inc. may be properly paid by the Applicant upon the closing of the Sales and that the restriction placed on payment of such fees shall be and is lifted, and any no such restriction shall be operative without further order of this Court.

AND FURTHER TAKE NOTICE that the grounds to be argued in support of this Application are as follows:

1. The reorganization approved by this Honourable Court on May 28, 2008, is anticipated to close shortly;
2. Stomp is in the process of formulating a Plan of Arrangement for filing in this

court, and intends to seek an Order setting out times and procedures for a meeting of its creditors in order to consider and to approve that Plan of Arrangement; and

3. An order that the creditor's meeting may be held, and a vote may be taken, it is required that the identity of the creditors, and their respective financial interests, be properly defined, with disputes to be resolved in a timely fashion, so as to permit the meeting, and any vote(s) to be properly constituted and held.

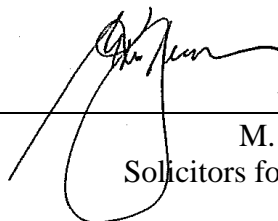
AND FURTHER TAKE NOTICE that in support of this Application shall be read:

- (a) This Notice of Motion with proof of service;
- (b) Seventh Affidavit of Ivan Stomp;
- (c) Seventh Report of the Monitor;
- (d) A form of Draft Order (Claims Procedure)
- (e) A form of Draft Order (Payment of Professional Fees)

DATED at the City of Saskatoon, in the Province of Saskatchewan, this 17th day of June, 2008.

**ROBERTSON STROMBERG PEDERSEN LLP**

Per: \_\_\_\_\_



M. Kim Anderson  
Solicitors for the Applicant

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