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December 20, 2017

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Via Hand Delivery

The Honourable Justice James L. Chipman
Supreme Court of Nova Scotia
The Law Courts
1815 Upper Water Street
Halifax, NS B3J 1S7

My Lord:

**Re: In the matter of the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36,
as amended, and in the matter of a Plan of Compromise of Arrangement of
Atlantica Diversified Transportation Systems Inc. – Hfx No. 470769
Comeback Hearing – December 22, 2017 at 9:30 a.m.**

We are counsel for Vaughn Sturgeon, a shareholder of Atlantica Diversified Transportation Systems Inc. ("**ADTS**") and his companies. The relief sought by ADTS at the comeback hearing on December 22, 2017 is three fold: (i) an extension of the stay against ADTS for a further 45 days; (ii) the issuance of a Claims Procedure Order; and (iii) that the stay in the Initial Order be lifted to allow Canada Western Bank and Canada Western Bank Leasing Inc. ("**CWB**") to enforce its lease rights. ADTS is no longer seeking the third ground of relief; however, it is anticipated that CWB will seek that the stay be lifted.

With respect to the request of ADTS to extend the stay of proceedings or on the Claims Procedure Order, Mr. Sturgeon is in agreement.

With respect to the request that the stay as against CWB be lifted, Mr. Sturgeon is not in agreement. As set out in the affidavit of the undersigned, Mr. Sturgeon and ADTS have been looking to inspect the seized trucks with the potential of making an offer for refinancing. This request has been refused by CWB.

It is unclear as to what potential offer CWB may have with respect to the sale of its trucks, as no details have been provided. The personal companies of Mr. Sturgeon are guarantors to the CWB debt. The refusal of CWB to allow for an inspection of the trucks in relation to a potential offer of refinancing may have a direct impact on any claim by CWB under these guarantees.

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It is the position of Mr. Sturgeon that the stay of proceedings should remain in place against all parties, including CWB.

Yours respectfully,

A handwritten signature in cursive script, appearing to read "Sara L. Scott".

Sara L. Scott

SLS/lms

- c. Client
 - Gavin MacDonald – via email
 - Bruce Clarke – via email
 - Adam Crane – via email