Court Administration
DEC 1 5 2017
Halifax, N.S.

Hfx No. 470769

SUPREME COURT OF NOVA SCOTIA

In Bankruptcy and Insolvency

- IN THE MATTER OF: The Companies' Creditors Arrangement Act, R.S.C. 1985, c. C-36, as amended
- IN THE MATTER OF: A Plan of Compromise or Arrangement of Atlantica Diversified Transportation Systems Inc.

FOURTH SUPPLEMENTAL AFFIDAVIT OF DAVID MONTGOMERY

I, DAVID MONTGOMERY, of Halifax, in the Province of Nova Scotia, MAKE OATH AND SAY AS FOLLOWS:

- I am the President of Atlantica Diversified Transportation Systems Inc. ("Atlantica"), the Applicant herein.
- 2. I have personal knowledge of the evidence sworn in this Affidavit except where otherwise stated to be based on information or belief.
- I state, in this Affidavit, the source of any information that is not based on my own personal knowledge, and I state my belief of the source.
- Since the Initial Order was granted by this court on December 7, 2017, I have been working diligently with customers, suppliers and employees to ensure their continued support for Atlantica.
- On December 13, 2017, our solicitors asked Canadian Western Bank ("CWB"), through its solicitors, to provide a statement of what is due to CWB, on a per unit basis.
- We have proposed a meeting with Vaughn Sturgeon and his counsel for early in the week of December 18th. No date has been set yet.

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- 7. We assisted in arranging a group of wholesalers to inspect the 2013 and 2014 units (as well as other units already seized by CWB) for the purpose of making an offer to CWB for them.
- We have been talking with potential truck and trailer lessors about the acquisition of new units to replace (or possibly refinance) existing trucks and trailers.
- 9. We are working on a plan to gather together the TrailerWizards trailers at our Moncton location, with the objective of having replacement trailers in hand, and the vast majority of the TrailerWizards trailers delivered to them, by the first working days of the New Year.
- We met with the Monitor, together with our advisers Burchells LLP and PricewaterhouseCoopers on December 14, 2017 to set out a workplan for the upcoming weeks.
- 11. Atlantica has promptly responded to all requests for information from the Monitor.
- 12. We expect to have a Plan of Arrangement to provide to the creditors by the end of January, 2018.
- Atlantica has been acting, and is acting, in good faith and with due diligence under the CCAA proceeding.
- 14. This affidavit is sworn in support of a request for an extension of the stay under the Initial Order for 45 days, until 11:59 p.m. on February 6, 2018.

SWORN before me at Halifax. Halifax Regional Municipality Province of Nova Scotia, this 14th day of December, 2017 A Barrister of the Supreme Court of Nova Scotia

DAVID MONTOMGERY

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D. BRUCE CLARKE Barrister of the Supreme Court of Nova Scotia