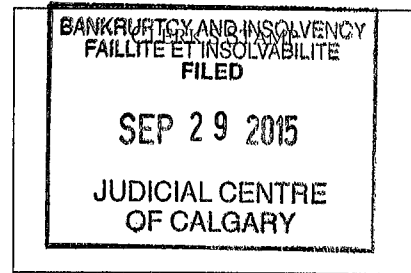


FORM 49  
[RULE 13.19]



COURT/ESTATE NO: 25-2038923  
COURT COURT OF QUEEN'S BENCH OF ALBERTA IN  
BANKRUPTCY AND INSOLVENCY  
JUDICIAL CENTRE CALGARY  
IN THE MATTER OF THE *BANKRUPTCY AND  
INSOLVENCY ACT*, RSC 1985 c B-3, AS  
AMENDED  
AND IN THE MATTER OF APACHE SUPERIOR  
PRINTING SOLUTIONS LTD.

DOCUMENT

**AFFIDAVIT**

ADDRESS FOR SERVICE AND  
CONTACT INFORMATION OF  
PARTY FILING THIS  
DOCUMENT

**BENNETT JONES LLP**  
Barristers and Solicitors  
4500, 855 – 2<sup>nd</sup> Street SW  
Calgary, Alberta T2P 4K7

Attention: Chris Simard/Jennie Buchanan  
Telephone No.: (403) 298-4485/3130  
Facsimile No.: (403) 265-7219  
Client File No.: 58368.9

**AFFIDAVIT OF DAVID GORDON-COOPER**

**Sworn [or Affirmed] on September 28, 2015.**

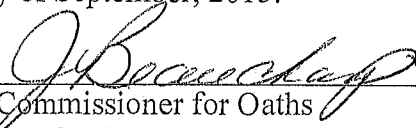
I, David Gordon-Cooper, of Airdrie, Alberta, SWEAR/AFFIRM AND SAY THAT:


1. I have been employed by Apache Superior Printing Ltd. (“**Apache**”) from December 12, 1991 to September 23, 2015 and acted as President and Chief Executive Officer from May 2013 to the date of bankruptcy and as such have personal knowledge of the matters herein deposed to by me except where stated to be based upon information and belief, in which case I verily believe the same to be true.

2. On September 23, 2015, Apache filed an assignment in bankruptcy (the "**Assignment**"). Pursuant to the Assignment, Hardie & Kelly Inc. was appointed as trustee of the bankrupt estate (the "**Trustee**").
3. Apache was in the commercial printing business. As at the date of bankruptcy, Apache's assets included its customer database (all information related to Apache's customers such as customer lists, customer data files, customer dockets, in addition to jobs, containing customer artwork and other information, printing plates, and completed and paid printing jobs, which Apache was storing for its customers (collectively, the "**Customer Related Information**").
4. I am advised by Kevin Meyler, Senior Vice President of Hardie & Kelly Inc. that on September 23, 2015 he was contacted by Fareed Suleman of Times Press Limited and that Mr. Suleman communicated his interest in acquiring the Customer Related Information of Apache, together with certain other assets.
5. In my experience, the commercial printing industry in which Apache operated is highly competitive. Accordingly, it is my belief that the value of Apache's customer list and customer data is likely to depreciate rapidly as the time period in which they do not have their printing needs met grows.
6. I believe that Apache's former sales people are all well-established in the commercial printing industry and I understand that many have already found alternate employment and will be contacting Apache's former customers in the near future. Accordingly, I believe that time is of the essence in realizing any value from the sale of the Customer Related Information.
7. In my experience, given the nature of the type of printing engagements that Apache has historically performed, it is relatively rare for a customer to request that their data or art files be returned as most customers will typically provide a copy of such art to Apache while maintaining the original, or, alternatively, will provide the original while maintaining a copy.

8. In addition, in the ordinary course of business, given space limitations in the facility, Apache would periodically destroy outdated customer docket and other customer data as provided by customers on its own initiative and without seeking permission or consent of the customers to do so.
9. As of the date of bankruptcy, I would estimate Apache to be currently in possession of approximately 20,000 docket from between 500 – 700 customers from approximately the year 2007 to the date of bankruptcy.
10. I make this affidavit in support of an application by the Trustee for the approval of a sale of certain rights to customer data and other associated assets.

SWORN(OR AFFIRMED) BEFORE ME )  
at CALGARY, Alberta, this 28 )  
day of September, 2015. )

  
A Commissioner for Oaths )  
in and for the Province of Alberta )

  
DAVID GORDON-COOPER )

**JERRI BEAUCHAMP**  
My Commission Expires  
October 10th, 2017