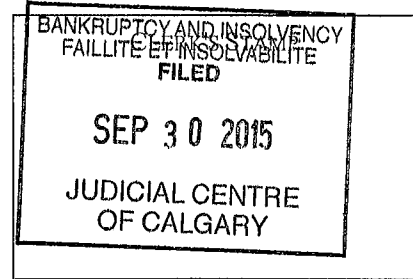


FORM 49
[RULE 13.19]



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 SUPPLEMENTAL AFFIDAVIT

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS
DOCUMENT

BENNETT JONES LLP
Barristers and Solicitors
4500, 855 – 2nd 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

SUPPLEMENTAL AFFIDAVIT OF DAVID GORDON-COOPER

Sworn ^{GD} ~~or Affirmed~~ ^{KT} on September 30, 2015.

I, David Gordon-Cooper, of Airdrie, Alberta, ^{GD} ~~SWEAR/AFFIRM~~ ^{GD} AND SAY THAT:

1. I was 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. This Affidavit supplements the evidence provided in my Affidavit of September 28, 2015 (the "**First Affidavit**"). Capitalized terms in this Affidavit are intended to have the same meaning assigned to them in the First Affidavit.

APACHE FORMER EMPLOYEES

3. The following individuals were employed by Apache up to the date of Apache's assignment into bankruptcy on September 23, 2015:

- (a) Vanessa Sikora;
- (b) Mike Schappert;
- (c) Neil Jakab;
- (d) Carly Bruce;
- (e) Sharon Power;
- (f) Claus Jeske;
- (g) Derek Standen; and
- (h) Audrey Henderson.

(collectively, the "**Former Employees**").


4. The Former Employees had direct contact with Apache customers during their employment with Apache.
5. Each of the Former Employees were provided with an Apache company e-mail address and I believe that the Former Employees communicated with Apache customers using these company e-mail accounts.

APACHE'S INTERNET AND EMAIL USAGE POLICY

6. The Former Employees' use of the Internet and company e-mail was governed by Apache's Internet and E-mail Usage Policy (the "**Policy**").

7. Initially, the Policy was a stand-alone document which was provided to all new Apache employees in accordance with Apache's standard business practice and such employees were required to execute an acknowledgement of the Policy as a condition of employment.
8. In 2010, the Policy was incorporated in its entirety into Apache's Employee Handbook (the "**Handbook**"). After this point, all new employees were provided with a copy of the Handbook in accordance with Apache's standard business practice and such employees were required to execute an acknowledgement of the Handbook and policies contained therein as a condition of employment. Attached hereto and marked as **Exhibit "1"** is a true copy of the relevant excerpts of the Handbook.
9. Pursuant to the Policy and the Handbook, all e-mail accounts and all information and messages that were created, sent, received or stored on Apache's e-mail system were the sole property of Apache and Apache had the right to monitor, access, read, delete, copy, disclose and use e-mail without prior notice to the originators and recipients of such e-mail.
10. It is my belief that all of the Former Employees were provided with either a copy of stand-alone Policy or the Handbook and signed an acknowledgement that they had received and understood the Policy or the Handbook, as the case may be (the "**Acknowledgements**"). Attached hereto and marked collectively as **Exhibit "2"** are true copies of the Acknowledgements executed by all of the Former Employees except Audrey Henderson.
11. I am unable to locate Ms. Henderson's executed Acknowledgement, but it is my belief that Ms. Henderson executed an Acknowledgement in accordance with Apache's standard business practice described above. I am not aware of any instance in which a new employee of Apache commenced their employment with Apache without first having executed an Acknowledgement.
12. I make this Supplemental 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(^{✓KD}OR ^{✓KD}AFFIRMED) BEFORE ME)
at Calgary, Alberta, this 30th)
day of September, 2015.)



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

Kathryn Isabelle Duke)
Student-at-Law)

Print Name and Expiry/Lawyer/Student-At-)
Law)



DAVID GORDON-COOPER



Apache Superior Printing Ltd.



March, 2010

THIS IS EXHIBIT " 1 " referred to in the (Affidavit Declaration) of David Gordon-Cooper Sworn Declared) before me this 30 day of September A.D. 20 15

A handwritten signature in black ink, appearing to read "Kathryn Isabelle Duke".

A Commissioner for Oaths in and for the Province of Alberta

A Notary Public

Kathryn Isabelle Duke
Student-at-Law

Apache Superior Printing Employee Handbook

need to use a phone for a call must stop the equipment they are using and step away from it.

Disciplinary Action – In case of cell phone abuse, Apache Superior Printing has a four step disciplinary procedure.

Step 1: Verbal Warning.

Step 2: Written Warning to be signed by employee and put in employee's permanent file.

Step 3: Suspension without pay.

Step 4: Dismissal.

Cell Phones and vehicles

In an effort to continuously improve safety at our workplace and in the communities in which we live and work, the use of all wireless communication devices (including hand-held and hands-free cell phones, Blackberries, text messaging devices, pagers, two way radio's, etc.) by employees is prohibited while operating a motor vehicle in the conduct of business for Apache Superior Printing.

Studies have confirmed that the driver distraction due to talking on a cell phone, either hand-held or hands-free, increase the risk of a motor vehicle crash by four to six times. This not only presents a danger to our employees, it jeopardizes the safety of other drivers and pedestrians. As an industry leader in safety, Apache Superior Printing believes that this policy, which promotes safe behavior, is the right thing to do. Our employees that must drive have been instructed to stop safely at regular intervals to collect voice mail messages and return customer calls.

6. Computer Related

Computers and Related Equipment

Apache Superior Printing provides employees access to computers, printers and other equipment on an as-needed basis, to perform their job requirements. This equipment is to be used exclusively for the business activities of Apache Superior Printing. Employees found to be using company computer equipment for personal use may be subject to appropriate disciplinary action, up to and including termination.

Personal software may not be installed on company equipment.

Apache Superior Printing Employee Handbook

Company equipment shall not be used to create or store personal information or data.

Company equipment shall not be used to store or display images depicting violence, sexually explicit material or are racially offensive material.

Software installed on company computers must be properly licensed and installed at the direction of the Information Technology Administrator.

Employees are not permitted to download any software (free or otherwise) without express permission from the Information Technology Administrator.

Internet

Internet use, on Company time, is authorized to conduct Company business only. Accessing the internet for personal use is prohibited. Employees are expressly prohibited from allowing any third party to use company computers or internet services without management consent.

While accessing the internet, employees should be fully aware of the global reach of the media. Employees are required to maintain a high level of dignity and be mindful that they represent Apache Superior Printing to the world at large while online.

Internet use brings the possibility of breaches to the security of confidential Company information. Internet use also creates the possibility of contamination to our system via viruses or spyware. Spyware allows unauthorized people, outside the Company, potential access to Company passwords and other confidential information.

Under no circumstances may Company computers or other electronic equipment be used to obtain, view, download, copy, print or distribute any material that is not related to the employee's job. This also includes

a) Downloading, copying, printing or distributing any material that is protected by copyright, trade secret, patent, intellectual property or other laws or regulations, including, but not limited to, installing or distributing "pirated" or other software products that are not appropriately licensed for the use by the company;

b) Downloading, printing, copying or distributing pornographic, hate material or otherwise immoral, unethical, or non-business-related Internet material deemed offensive by the company.

c) Posting or distributing any information about, or lists of, the company's employees, trade secrets or any other sensitive or confidential information related to the company to parties outside of the Company;

d) Exporting software, technical information, encryption software or technology, in violation of international or regional export control laws;

e) Introducing malicious programs into the company's network or servers, including, but not limited to, viruses, worms, Trojan horse and email bombs.

Apache Superior Printing Employee Handbook

f) Affecting security breaches or disruptions of network communications, including, but not limited to, accessing data of which the employee is not an intended recipient or logging into a server or account that is not expressly authorized to access, unless these duties are within the scope of regular duties. For purposes of this section, "disruption" includes, but is not limited to, network sniffing, pinged floods, packet spoofing, denial of service and forged routing information for malicious purposes.

Any violations of the above policy will result in disciplinary actions up to and including termination.

Apache Superior Printing maintains the right to limit internet access or restrict access to internet sights or domains.

In addition, all of the company's internet-related resources are provided for business purposes. Therefore, the company maintains the right to monitor the volume of internet and network traffic, together with the internet sites visited. The specific content of any transactions will not be monitored unless there is a suspicion of improper use.

For protection of the company network and proprietary information, security measures have been installed on the systems. No employee shall, under any circumstances, attempt to disable or circumvent these security measures.

Apache Superior Printing will comply with any reasonable requests from law enforcement to review internet activities of any employee.

Email & Electronic Communication

Email & electronic communication is to be used for Company business only. Personal use should be kept to an absolute minimum. Company confidential information must not be shared outside of the Company, without authorization, at any time.

Viewing or sending pornography, or pornographic jokes or stories via email, is absolutely not permitted by Apache Superior Printing, these emails will result in disciplinary action up to and including termination.

Any emails that contain hate material or discriminate against staff by virtue of any protected classification including race, gender, nationality, religion, and so forth, will result in disciplinary action up to and including termination.

All email accounts and all information and messages that are created, sent, received or stored on Apache Superior Printing's e-mail system is the sole property of Apache Superior Printing and are not the property of the employee or other personnel.

All email is subject to the right of Apache Superior Printing to monitor, access, read, delete, copy, disclose and use e-mail without prior notice to the

Apache Superior Printing Employee Handbook

originators and recipients of such e-mail. E-mail may be monitored and read by authorized personnel of Apache Superior Printing for any violations of law, breaches of company policies, communications harmful to the company, or any other reason.

Apache Superior Printing will comply with any reasonable requests from law enforcement to review e-mail activities of any employee.

No anonymous emails can be sent from Apache Superior Printing. All employees are required to identify themselves by name and email address.

Chat room participation is prohibited except for business related forums which require approval from management.

7. Policies for Leave of Absence

Leave of Absence

Apache Superior Printing will make every reasonable effort to consider a request for personal leave of absence. All leave of absence must be authorized by management directly.

Many factors are considered when determining eligibility for a leave of absence and is granted or denied solely at the discretion of Apache Superior Printing.

Sick Leave

If you are unable to come to work for any reason you must contact your immediate supervisor before the start of your shift or as soon as possible. If you must leave before the end of your shift or for any reason you must clear it with your supervisor first.

When you call you must speak directly to your supervisor, employees are not permitted to leave messages. When you call you are expected to indicate the reason for your absence and its likely duration. In the event that your absence continues for a number of days or weeks, you must maintain daily contact with the company to keep us informed of the reasons for your ongoing absence and the date when you expect to be able to return to work.

Sickness absence of more than two days must be provided with a medical note from your doctor. Apache Superior Printing will randomly request for employees to provide a doctor's note for one day missed due to an illness.

1-Don't call sick because you woke up late that day.

2-Don't call sick if you have a personal problem that you need to solve.

3-Definitely shouldn't call in sick if you don't feel like working that day.

Simply, you should only call in sick when you're really sick, and not for any other reason. Abusing the sick day's policy could have a detrimental impact on your relation with your co-workers.

11. Acknowledgement

I have read the policies outlined in this handbook. I understand that while this is not an employment contract I am bound to abide by the policies set herein.

I further understand that Apache Superior Printing may modify, revise and update policy and/or this manual at any time. I am also aware that this updating may include additions or deletions.

I also certify that I have had ample time to discuss this handbook and its contents with an Apache Superior Printing representative and I fully understand the contents.

With this knowledge I accept the policies outlined herein as a condition of employment.

Employee signature Vanessa Sikora

Date February 16, 2011

Apache Superior Printing reserves the right to make changes to this handbook for the purpose of modifying, revising and updating company policy and this manual. Notice of changes will be posted on the bulletin boards and become a part of this manual. Violation of any company policy may result in immediate termination.

THIS IS EXHIBIT " 2 "
referred to in the (Affidavit
Declaration) of
David Gordon-Cooper
Sworn
Declared) before me this 30
day of September A.D. 20 15

A Commissioner for Oaths in and for
the Province of Alberta

A Notary Public

Kathryn Isabelle Duke
Student-at-Law

11. Acknowledgement

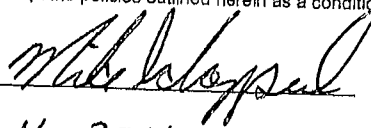
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I further understand that Apache Superior Printing may modify, revise and update policy and/or this manual at any time. I am also aware that this updating may include additions or deletions.

I also certify that I have had ample time to discuss this handbook and its contents with an Apache Superior Printing representative and I fully understand the contents.

With this knowledge I accept the policies outlined herein as a condition of employment.

Employee signature



Date

FEB 16, 2011

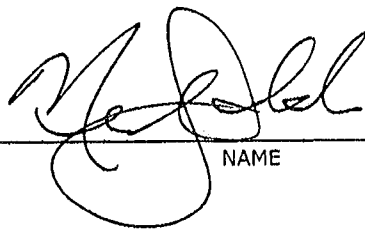
Apache Superior Printing reserves the right to make changes to this handbook for the purpose of modifying, revising and updating company policy and this manual. Notice of changes will be posted on the bulletin boards and become a part of this manual. Violation of any company policy may result in immediate termination.



Employee Internet and Email Usage Policy

I hereby acknowledge that I have received, and understand Apache Superior Printings policy on Internet and Email usage, and I understand that violation of the said policy's may result in disciplinary action up to and including termination.

March 12/10
DATE


NAME



Employee Internet and Email Usage Policy

I hereby acknowledge that I have received, and understand Apache Superior Printings policy on Internet and Email usage, and I understand that violation of the said policy's may result in disciplinary action up to and including termination.

Mar 12/10
DATE

[Signature]
NAME



Employee Internet and Email Usage Policy

I hereby acknowledge that I have received, and understand Apache Superior Printings policy on Internet and Email usage, and I understand that violation of the said policy's may result in disciplinary action up to and including termination.

Apr 12 2010 Shan Lewis
DATE NAME



Employee Internet and Email Usage Policy

I hereby acknowledge that I have received, and understand Apache Superior Printings policy on Internet and Email usage, and I understand that violation of the said policy's may result in disciplinary action up to and including termination.

Mar. 16/10
DATE

[Signature]
NAME



Employee Internet and Email Usage Policy

I hereby acknowledge that I have received, and understand Apache Superior Printings policy on Internet and Email usage, and I understand that violation of the said policy's may result in disciplinary action up to and including termination.

12 March 2010

DATE

A handwritten signature in black ink, appearing to be "J. V. [unclear]", written over a horizontal line.

NAME



Employee Internet and Email Usage Policy

I hereby acknowledge that I have received, and understand Apache Superior Printings policy on Internet and Email usage, and I understand that violation of the said policy's may result in disciplinary action up to and including termination.

March 12, 2010

DATE

[Handwritten Signature]

NAME