

**IN THE COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL DISTRICT OF CALGARY**

BETWEEN:

ROYAL BANK OF CANADA

Plaintiff

and

**HIRSCHE HEREFORDS, GRANT HIRSCHE and
ANNETTE HIRSCHE**

Defendants

NOTICE OF MOTION

TAKE NOTICE that an application will be made on behalf of PricewaterhouseCoopers Inc., the Court appointed Receiver ("the Receiver") of the Defendant Hirsche Herefords ("Hirsche") before the Honourable Justice Strekaf, at the Calgary Court Centre in the City of Calgary, in the Province of Alberta, on Thursday, the 10th day of June, 2010 at the hour of 9:30 in the morning, or so soon thereafter as counsel may be heard, for an Order for the following relief:

1. Increasing the Receiver's borrowing power from \$500,000 to \$800,000 as outlined in the Receiver's First Report, filed ("The First Report"), and authorizing and directing the Receiver to issue a Receiver's Certificate accordingly;
2. Clarifying and amending the original Receivership Order to expand the definition of "Debtor" to include all the named Defendants, including Grant and Annette Hirsche, individually and as partners of Hirsche Herefords;
3. Approving the form of sales process as proposed by the Receiver;
4. If necessary, deeming good and sufficient service of notice of this application by ordinary mail, courier or facsimile, or email;

5. Directing that service of any Order and any subsequent documents arising from this application may be effected upon the parties listed on Schedule "A" at the addresses listed therein by registered mail, fax or email delivery; and

6. Providing such further and other advice and directions as may be required.

AND FURTHER TAKE NOTICE that in support of the application will be read the Receiver's First Report, served concurrently herewith.

AND FURTHER TAKE NOTICE that the grounds and statutory authorities intended to be relied upon by the Receiver in making this application include:

1. The Receiver requires an increase in borrowings to access more funds for the operation of the Debtor's enterprise;
2. The Receivership Order defines the Debtor as "Hirsche Herefords", which appears to be a partnership of Grant and Annette Hirsche. For greater certainty, the Receiver requires an amendment and clarification of the Receivership Order so that it will cover the assets of all the named Defendants;
3. The priority secured creditors support the Receiver's proposed sales process; and
4. Such further and other grounds as counsel may advise and this Honourable Court may permit.

DATED at the City of Calgary, in the Province of Alberta, this 4th day of June, 2010.

PARLEE McLAWS LLP

Per: 

Scott Watson
Solicitors for PricewaterhouseCoopers
Inc., the Court Appointed Receiver of
Hirsche

TO: THE CLERK OF THE COURT

AND TO: The Parties listed on Schedule "A" attached hereto

SCHEDULE "A"

<p>Farm Credit Canada c/o Torry Lewis Abells LLP Attn: Ken Torry, Q.C. 110 Chancery Court 220 - 4th Street South Lethbridge, AB T1J 4J7</p>	<p>AGCO Finance Canada 80001 Birchwood Court PO Box 2000 Johnston, Iowa 50131-0020</p>
<p>Ford Credit Canada and Ranchland Ford Sales Inc. c/o Walsh Wilkins Creighton LLP Attn: Paul Pidde 2800, 801 - 6th Avenue SW Calgary, AB T2P 4A3</p>	<p>Invesco Mortgage Inc. c/o Gowlings Attn: Craig McMahon 1400, 700 - 2nd Street SW Calgary, AB T2P 4V5</p>
<p>RBK Farms, operating as Stirling Truck and Tractor c/o Penner Law Attn: Roger Penner #2, 201 - 2 Avenue South Lethbridge, AB T1J 0B7</p>	<p>Royal Bank of Canada c/o Fraser Milner Casgrain Attn: David LeGeyt 1500, 850-2nd Street Calgary, AB T2P 0R8</p>

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Facsimile: (403) 265-8263

File Number: 239-18

