

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF COLORADO**

In re:)	
)	Chapter 15
POSEIDON CONCEPTS CORP.,)	Case No. 13-15893 HRT
)	
Debtor in foreign proceeding.)	<i>(Jointly Administered)</i>
)	

NOTICE OF MOTION FOR APPROVAL OF CLAIMS PROCEDURES

OBJECTION DEADLINE: Friday, April 17, 2015

Poseidon Concepts Corp., Poseidon Concepts Ltd., Poseidon Concepts Limited Partnership, and Poseidon Concepts Inc. (collectively referred to as the “PC Debtors”) initiated a proceeding under the Companies’ Creditors Arrangement Act (the “CCAA”) on April 9, 2013, in the Court of Queen’s Bench of Alberta, Canada (the “Canadian Proceeding”). On April 12, 2013, the court-appointed monitor, PricewaterhouseCooper Inc. (the “Monitor”) filed four Chapter 15 petitions on behalf of the PC Debtors (collectively, the “US Proceedings”).

The Monitor has filed a Motion for Approval of Claims Procedures (“Motion”) by which the Monitor will have exclusive authority to file objections to disputed proofs of claim filed in the US Proceedings. The Monitor proposes that the Bankruptcy Court adopt certain provisions of the Bankruptcy Code for purposes of adjudicating certain claims that have been filed in the US Proceedings. These include 11 U.S.C. §§ 501, 502, 505, 506, 509 and 510. To the extent not inconsistent with the requested claims procedures, the Rules of Bankruptcy Procedure will also apply. The Motion does not seek relief with respect to any particular claim filed in the US Proceedings. Rather, it seeks the establishment of procedures for resolving disputed claims.

The Monitor asserts the Motion proposes a fair and efficient mechanism for litigating disputed proofs of claim that have been filed in the US Proceedings. Copies of the Motion are available upon request made to the undersigned attorneys for the Monitor.

If you oppose the Motion or object to the requested relief, your objection and request for hearing must be filed on or before the objection deadline stated above, served on the movant at the address indicated below, and must state clearly all objections and any legal basis for the objections. The Court will not consider general objections.

In the absence of a timely, substantiated objection and request for hearing by an interested party, the Court may approve or grant the requested relief without any further notice to creditors or other interested parties.

Dated: March 27, 2015

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