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February 7, 2003

Anna M. Locke
Patterson Palmer
10th Floor, Scotia Centre
235 Water Street
St. John's, NF A1C 5J9

Dear Anna:

**RE: PricewaterhouseCoopers, as Receiver and Trustee of
Hickman Equipment (1985) Limited (the "Receiver")
2002 O1T 0352
Estate No. 100813/ Court No. 9733**

Please find enclosed, for posting on the Receiver's web-site, copies of Replies of Hickman Motors Limited in respect of the following applications:

- 7.24 ABN-AMRO Leasing
- 7.32 CIT Financial Limited
- 7.33 GMAC
- 7.33a CIT Financial Limited
- 7.37 John Deere Credit Inc.
- 7.41 Ingersoll-Rand Canada Inc.

The above were filed with the Court today.

Yours very truly,

A handwritten signature in black ink, appearing to read "Griffith Roberts".

Griffith Roberts

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SUMMARY OF CURRENT DOCUMENT							
Name of Issuing Person or Party	Hickman Motors Limited						
Date of Document	February 7, 2003						
Reference Application	ABN-AMRO Leasing, a Division of ABN-AMRO Bank N.V., Canada Branch ("AAL")						
Summary of Order/ Relief Sought or Statement of Purpose for Filing	Reply of Hickman Motors Limited to <i>Interlocutory Application</i> (Inter Partes) of AAL in respect of the following asset of Hickman Equipment: <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Model</th> <th style="text-align: left;">Serial No.</th> <th style="text-align: left;">Proceeds</th> </tr> </thead> <tbody> <tr> <td>John Deere Dozer</td> <td>T0450HX874682</td> <td>\$60,000</td> </tr> </tbody> </table>	Model	Serial No.	Proceeds	John Deere Dozer	T0450HX874682	\$60,000
Model	Serial No.	Proceeds					
John Deere Dozer	T0450HX874682	\$60,000					
Court Sub-File Number	7.24						

2002 01T 0352

IN THE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR

AND IN THE MATTER OF a Court ordered Receivership of Hickman Equipment (1985) Limited ("Hickman Equipment") pursuant to Rule 25 of the *Rules of the Supreme Court, 1986* under the *Judicature Act, R.S.N.L. 1990, c. J-4*, as amended

AND IN THE MATTER OF the *Bankruptcy and Insolvency Act*, Chapter B-3 of the Revised Statutes of Canada, 1985, as amended (the "BIA")

**REPLY OF HICKMAN MOTORS LIMITED
TO THE INTERLOCUTORY APPLICATION (Inter Partes)
OF AAL DATED DECEMBER 5, 2002**

The Reply of Hickman Motors Limited ("Hickman Motors") says as follows:

1. Hickman Motors is a Newfoundland body corporate formed effective January 1, 2003 on the amalgamation of Hickman Leasing Limited and Hickman Motors Limited.

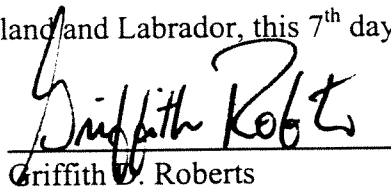
2. Subject to any interest claimed by Canadian Imperial Bank of Commerce, Hickman Motors claims title to and a prior interest in one of vehicles that is the subject matter of the within application, namely:

Model	Serial No.	Proceeds
John Deere 450 H Crawler Dozer	T0450HX874682	\$60,000.00

(the "HML Vehicle").

3. Hickman Motors submits that the HML Vehicle was sold by Hickman Equipment to it in the ordinary course of Hickman Equipment's business and that, pursuant to subsection 31(2) of the *Personal Property Security Act* (Newfoundland and Labrador), Hickman Motors acquired the HML Vehicle free of any security interest given by Hickman Equipment in the HML Vehicle, including that asserted by AAL.
4. Hickman Motors therefore requests an Order from this Honourable Court approving, subject to any interest claimed by Canadian Imperial Bank of Commerce, the payment by the Receiver to Hickman Motors of the proceeds from the sale of the HML Vehicle.

DATED at St. John's, in the Province of Newfoundland and Labrador, this 7th day of February, 2003.



Griffith D. Roberts
COX HANSON O'REILLY MATHESON
Solicitors for Hickman Motors Limited
whose address for service is
Suite 401, Scotia Centre
235 Water Street
St. John's, NL A1C 1B6