



Suite 401, Scotia Centre  
235 Water Street  
St. John's, NF  
Canada A1C 1B6

Phone (709) 726-3321  
Fax (709) 726-2992

**GRIFFITH D. ROBERTS**  
Barrister and Solicitor

Direct Line (709) 570-5336  
rstack@coxhanson.ca

February 7, 2003

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

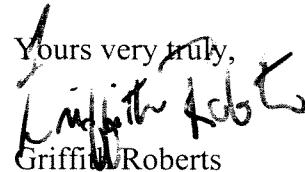
Dear Anna:

**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,  
  
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	<p>Reply of Hickman Motors Limited to <i>Interlocutory Application</i> (Inter Partes) of AAL in respect of the following asset of Hickman Equipment:</p> <table> <thead> <tr> <th>Model</th> <th>Serial No.</th> <th>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:

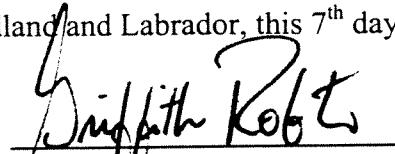
Model	Serial No.	Proceeds
John Deere 450 H Crawler Dozer	T0450HX874682	\$60,000.00

(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 7<sup>th</sup> 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