

Court of Appeal File No. \_\_\_\_\_  
Supreme Court File No. S126583  
Supreme Court Registry: Vancouver

**COURT OF APPEAL**

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,  
R.S.C. 1985, C. C-36, AS AMENDED

AND

IN THE MATTER OF THE *BUSINESS CORPORATIONS ACT*, S.B.C. 2002, C. 57

AND

IN THE MATTER OF GREAT BASIN GOLD LTD.

BETWEEN:

GREAT BASIN GOLD LTD.

RESPONDENT  
(PETITIONER)

AND:

THE AD HOC GROUP OF CONVERTIBLE DEBENTURE HOLDERS

APPELLANT  
(RESPONDENT)

**NOTICE OF MOTION**

TO: The Service List

TAKE NOTICE THAT AN APPLICATION will be made by the Ad Hoc Group of Convertible Debenture Holders (collectively the "**Ad Hoc Group**") to the presiding justice at 800 Hornby Street, British Columbia, at 2:00 p.m. on Thursday, September 27, 2012, or as soon thereafter as may be practicable, for orders, pursuant to sections 10(2)(d) and 18 of the *Court of Appeal Act*, R.S.B.C., c. 77, as amended, and section 13 of the *Companies' Creditors Arrangement Act*, R.S.C., c. C-36, as amended, on the following terms:

1. abridging the time for service of this Application such that the Application is properly returnable at 2:00 p.m. on September 27, 2012;

2. staying the proceedings below on an interim basis pending the hearing of the Ad Hoc Group's Application for Leave to Appeal, dated September 27, 2012, or further order of the Court; and
3. providing such further terms as are considered just and necessary.

AND TAKE NOTICE THAT in support of the application will be read: N/A

The applicant anticipates that this application will be contested

Dated: September 27, 2012

Signed

  
Counsel for the Ad Hoc Group  
James R. Schmidt

This application will take no more than 30 minutes to be heard.