

**DONNYBROOK SECURITIES LITIGATION**  
Court of Queen's Bench of Alberta, Court File No. 1301-10050

**PROOF OF CLAIM AND RELEASE**

**I. GENERAL INSTRUCTIONS**

1. To recover as a member of the Class based on your claims in the action entitled Court File No. 1301-10050, you must complete and, on page 4 hereof, sign this Proof of Claim and Release ("Claim Form"). If you fail to file a properly addressed (as set forth in paragraph 4 below) Claim Form, your claim may be rejected and you may be precluded from any recovery from the settlement fund created in connection with the proposed settlement of the Action.
2. A separate claim must be filed for each account in which Donnybrook shares were held.
3. Submission of this Claim Form, however, does not assure that you will share in the proceeds of settlement in the Action.
4. **PLEASE MAKE SURE TO MAIL YOUR COMPLETED AND SIGNED CLAIM FORM POSTMARKED ON OR BEFORE FEBRUARY 11, 2016, ADDRESSED TO THE CLAIMS ADMINISTRATOR:**

**Donnybrook Securities Litigation**  
Claims Administrator  
c/o RicePoint Administration Inc.  
P.O. Box 3355  
London, ON N6A 4K3

If you are NOT a member of the Class, as defined in the Settlement Agreement PLEASE DO NOT submit a Claim Form.

**If you are a member of the Class, you are bound by the terms of the judgment which approved the settlement of the present Action, WHETHER OR NOT YOU SUBMIT A CLAIM FORM, unless you have already opted-out of the Class.**

**II. DEFINITIONS**

1. "Arrangement" means the statutory plan of arrangement completed between Donnybrook, Donnycreek and the shareholders of Donnybrook on November 4, 2011.
2. "Class" or "Class Members" means all persons and entities, wherever they may reside or be domiciled, who held Donnybrook shares at the time of the Arrangement and received Donnycreek shares through the Arrangement, other than (i) Excluded Persons, and (ii) any persons who validly opted out of the Action in accordance with the Consent Certification Order of the Court filed on January 22, 2015.
3. "Defendants" means collectively, Stonehaven Exploration Ltd. (formerly known as Donnybrook Energy Inc.), Kicking Horse Energy Inc. (formerly known as Donnycreek Energy Inc.), Malcolm Todd, Robert Todd, Murray Scalf, David Patterson, Randy Kwasnicia, Ken Stephenson and Colin Watt.
4. "Excluded Persons" means all the Defendants, and past and present subsidiaries, affiliates, officers, directors, senior employees, legal representatives, heirs, predecessors, successors and assigns of Donnybrook or Donnycreek, and any individual who is an immediate member of the family of an Individual Defendant, and any other person who purchased Donnycreek shares in the Private Placement.
5. "Releasees" means the Defendants, their insurers, their respective past and present affiliates and subsidiaries, and all of their respective past and present directors, officers, trustees, partners, employees, servants, consultants, underwriters, advisors, lawyers, representatives, successors, assigns and their heirs, executors, administrators, successors and assigns, as the case may be.
6. "Released Claims" (or "Released Claim" in the singular) means any and all manner of claims, demands, actions, suits, causes of action, whether class, individual or otherwise in nature, damages of any nature whatsoever, including interest, costs, expenses, Administration Expenses, penalties, Class Counsel Fees and lawyers' fees, known or unknown, suspected or unsuspected, in law, under statute or in equity, that Releasers, or any of them, whether directly, indirectly, derivatively, or in any other capacity, ever had, now have, or hereafter can, shall, or may have against the Releasees, relating in any way to the Action or to any allegations made or which could have been made in the Action, including, without limitation, representations made by the Releasees to the Class Members concerning the matters alleged by the Plaintiff in the Action.

### III. CLAIMANT IDENTIFICATION

1. If you held Donnybrook shares in your name, you are the beneficial purchaser as well as the record purchaser. If, however, the shares were registered in the name of a third party, such as a nominee or brokerage firm, you are the beneficial purchaser and the third party is the record purchaser.
2. Use Part I of this form entitled "Claimant Identification" to identify each purchaser of record. In addition, if you are NOT the beneficial owner and are filing a claim on behalf of the beneficial owner, please complete the "filer name" field in Part I of the "Claimant Identification" section on the first page of the claim form. **THIS CLAIM MUST BE FILED BY THE ACTUAL BENEFICIAL PURCHASER OR PURCHASERS, OR THE LEGAL REPRESENTATIVE OF SUCH PURCHASER OR PURCHASERS OF THE DONNYBROOK SHARES UPON WHICH THIS CLAIM IS BASED.**
3. All joint purchasers must sign this claim. Executors, administrators, guardians, conservators and trustees must complete and sign this claim on behalf of Persons represented by them and their authority must accompany this claim and their titles or capacities must be stated. The Social Insurance number, Business number or other unique tax identifier and telephone number of the beneficial purchaser may be used in verifying the claim. Failure to provide the foregoing information could delay verification of your claim or result in rejection of the claim.

### IV. CLAIM FORM

1. You may file your Claim Form with the Claims Administrator by submitting a claim by mail or electronically to the Claims Administrator (see address on first page of these instructions).
2. A separate claim must be filed for each account in which Donnybrook shares were held.
3. You must provide all of the requested information with respect to Donnybrook shares held on November 4, 2011. Failure to report all such information may result in the rejection of your claim.
4. Broker confirmations or other documentation of your holdings of Donnybrook shares must be attached to your claim.
5. The above requests are designed to provide the minimum amount of information necessary to process the most simple claims. The Claims Administrator may request additional information as required to efficiently and reliably calculate your losses. In some cases where the Claims Administrator cannot perform the calculation accurately or at a reasonable cost to the Class with the information provided, the Claims Administrator may conditionally accept the claim pending receipt of additional information.
6. **NOTICE REGARDING ELECTRONIC FILES:** Certain claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in an electronic aggregate file. If you wish to file an electronic file batch claim, you must contact the Claims Administrator at 1-866-432-5534 or [donnybrook@nptricepoint.com](mailto:donnybrook@nptricepoint.com).



**PART II. SCHEDULE OF SHARES HELD AT TIME OF ARRANGEMENT**

A. Number of Donnybrook shares held at the close of trading on November 4, 2011:

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Proof Enclosed?  
 Y  
 N

**NOTE:** You must submit proof of Donnybrook shares held at the close of trading on November 4, 2011 with your Claim Form.

Acceptable proof includes a monthly statement from a financial advisor or financial institution, OR any other genuine and objective genuine or objective document(s) indicating the number of Donnybrook shares held during the month of November, 2011.

**PART III. SWORN STATEMENT & SUBMISSION TO JURISDICTION OF THE COURT OF QUEEN'S BENCH OF ALBERTA**

1. I (we) submit this Claim Form under the terms of the Settlement Agreement dated July 10, 2015 that settled the above Action and that was approved by the Court of Queen's Bench of Alberta on October 9, 2015, as described in the Notice of Approval that was published in certain newspapers.
2. By submitting this Claim Form, I (we) state that I (we) believe, in good faith, that I am (we are) a Class Member who was a shareholder of Donnybrook.
3. I (we) certify that I (we) did not exclude myself (ourselves) from the Action.
4. I (we) certify that I am (we were) not and never was (were) a Defendant or any of its affiliates or corporate subsidiaries, and that I am (we were) not and never was (were) an officer or director of a Defendant or any of its affiliates or corporate subsidiaries.
5. I (we) certify that the information contained in this Claim Form is true and correct, and indicates all of my (our) holdings of shares of Donnybrook.
6. I (we) acknowledge and accept that the information contained in this Claim Form is subject to such verification as the Claims Administrator may request or as the Court may direct, and I (we) agree to cooperate in any such verification. I (we) also agree to furnish any additional information or documentation (if available) that may be requested by the Claims Administrator or the Court to support this Claim Form.
7. I (we) have not submitted any other Claim Form covering the same holdings of Donnybrook shares, and I (we) know of no person who has done so on my (our) behalf.
8. After the Claims Administrator has distributed the Net Settlement Amount in accordance with the orders of the Court all of the class members shall be deemed to grant a full and final release and discharge to the Claims Administrator and all of its officers and directors.
9. I (we) certify that I (we) submit and consent to the jurisdiction of the Court of the Queen's Bench of Alberta which has authorized the Action of which I am a Class Member, with respect to my Claim Form filed as a Class Member and for the purpose of enforcing the Releases set forth above. I (we) further certify and submit that I am (we are) bound by and subject to the terms of any Order that may be rendered by the Court with respect to the Settlement Agreement regarding this Action.
10. I (we) swear that the foregoing information supplied by me (us) is true and correct.

Executed this \_\_\_\_\_ day of \_\_\_\_\_ in \_\_\_\_\_  
 (Month/Year) (City/Province/Country)

\_\_\_\_\_  
 (Sign your name here)

\_\_\_\_\_  
 (Sign your name here)

\_\_\_\_\_  
 (Type or print your name here)

\_\_\_\_\_  
 (Type or print your name here)

\_\_\_\_\_  
 (Capacity of person(s) signing, e.g.,  
 Beneficial Purchaser, Executor or Administrator)  
 Proof of Authority to File Enclosed?  Yes  No

\_\_\_\_\_  
 (Capacity of person(s) signing, e.g.,  
 Beneficial Purchaser, Executor or Administrator)  
 Proof of Authority to File Enclosed?  Yes  No

