

This is the 1st Affidavit of Tom Powell in this case and was made on November 6, 2025

> No. S-240358 Vancouver Registry

### IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

#### NATIONAL BANK OF CANADA

**PETITIONER** 

AND:

1326 MANN FARM INC., K P DRYWALL LTD., 13 MANN FARMS B.C. LTD., and DYKE VALLEY BERRY FARMS LTD.

RESPONDENTS

#### **AFFIDAVIT**

I, Tom Powell, Licensed Insolvency Trustee, of Suite 1450 – 701 West Georgia Street, Vancouver, British Columbia, AFFIRM THAT:

- I am a Senior Managing Director at FTI Consulting Canada Inc. ("FTI"), receiver (in such capacity, the "Receiver") of the properties, assets and undertakings of 1326 Mann Farm Inc., K P Drywall Ltd., 13 Mann Farms B.C. Ltd., and Dyke Valley Berry Farms Ltd., subject to certain exclusions in the receivership order of the Honourable Justice Taylor made herein on March 8, 2024 (the "Receivership Order"). As such, I have personal knowledge of the matters deposed to in this affidavit, except where stated to be on information and belief, in which case I verily believe them to be true.
- I am the person at FTI that has had primary carriage of this matter, and I am authorized to make this affidavit on behalf of the Receiver in support of its application for an order approving the Receiver's fees and activities in these proceedings.

## A. Receiver's Invoices and Fees

3. Attached hereto and marked as **Exhibit "A"** are copies of the following invoices (collectively, the "**Receiver Invoices**") issued by FTI showing fees for services rendered and disbursements incurred in this matter:

Invoice #	Invoice Date	Fees (\$)	Disbursements (\$)	GST (\$)	Total (\$)
102900001094	2024-03-31	\$68,560.00	\$1,023.72	\$3,479.19	\$73,062.91
102900001208	2024-05-07	\$50,567.50	\$232.08	\$2,539.98	\$53,339.56
102900001327	2024-06-07	\$31,716.00	\$151.60	\$1,593.38	\$33,460.98
102900001413	2024-07-11	\$12,091.00	\$16.28	\$605.37	\$12,712.65
102900001604	2024-09-06	\$48,600.50	\$155.76	\$2,437.81	\$51,194.07
102900001727	2024-10-09	\$8,160.00	-	\$408.00	\$8,568.00
102900001813	2024-11-11	\$11,477.00	-	\$573.85	\$12,050.85
102900001921	2024-12-11	\$8,751.00	-	\$437.55	\$9,188.55
102900001994	2025-01-08	\$3,077.50	-	\$153.88	\$3,231.38
102900002090	2025-02-10	\$8,385.00	-	\$419.25	\$8,804.25
102900002164	2025-03-06	\$7,743.00	-	\$387.15	\$8,130.15
102900002349	2025-05-12	\$15,681.00	-	\$784.05	\$16,465.05
102900002445	2025-06-10	\$7,095.00	-	\$354.75	\$7,449.75
102900002547	2025-07-14	\$43,684.00	-	\$2,184.20	\$45,868.20
102900002634	2025-08-11	\$35,831.00	-	\$1,791.55	\$37,622.55
102900002758	2025-09-11	\$12,765.00	-	\$638.25	\$13,403.25
тот	AL	\$374,184.50	\$1,579.44	\$18,788.21	\$394,552.15

4. As detailed in the Receiver Invoices, from March 2024 to September 2025, FTI invoiced fees totalling to \$374,184.50, and incurred and invoiced for disbursements in the amount of \$1,579.44, and taxes in the amount of \$18,788.21, for a total of \$394,522.15 (the "Receiver Fees").

- 5. The Receiver Fees as set out in the Receiver Invoices are calculated on the basis of the hours spent by the Receiver's personnel, multiplied by the applicable standard hourly rates charged by FTI in its insolvency practice.
- 6. Several professionals at FTI expended time on this matter. The following is a summary of the time expended by each professional on the Receiver Invoices and their hourly rate:

Professional	Position	Rate	Hours	<b>Total Fees</b>
Tom Powell	Senior Managing Director	\$1,034	77.70	\$80,331.00
Craig Munro	Managing Director	\$850	0.50	\$425.00
Michael Clark	Managing Director	\$836	342.10	\$285,867.00
Huw Parks	Director	\$678	4.40	\$2,982.00
Tessa Chiricosta	Senior Consultant	\$375	1.60	\$600.00
Brandi Swift	Consultant	\$370	9.70	\$3,591.50
Kathleen Foster	Executive Assistant II	\$125	0.50	\$62.50
Caitlin Moreland	Administrative Professional	\$155	2.10	\$325.50

- 7. The total amount of time charged on the Receiver Invoices is 438.6 hours at an average billable rate of \$853.13/hour
- 8. To the best of my knowledge, information and belief, the information contained in the Receiver Invoices is true and accurate in all respects as to:
  - (a) the number of hours worked;
  - (b) the nature of work performed;
  - (c) the identity of the individuals who performed work; and
  - (d) the rates charged for the work performed.
- 9. I have reviewed the Receiver Invoices, and considering the invoices in connection with the Receiver's activities in the receivership as described in the Receiver Reports, I verily believe that:

- (a) the Receiver's professional fees and disbursements have been properly incurred and are fair and reasonable in the circumstances;
- (b) the work completed by the Receiver was delegated to the appropriate professionals at FTI with the appropriate seniority and hourly rates;
- (c) the Receiver's fees in this matter are consistent with the fees charged by other insolvency firms of a similar size for work of a similar nature and complexity in British Columbia; and
- (d) the services were provided by the Receiver in a prudent and economical manner.

## B. Receiver's Reports and activities

- 10. The details of the work carried out by the Receiver in these proceedings are set forth in the reports of the Receiver to the Court (collectively, the "Receiver Reports") prepared and filed by the Receiver in these proceedings, namely, the First Report of the Receiver dated July 8, 2025, and the Second Report of the Receiver dated November 6, 2025.
- 11. I have reviewed the Receiver Reports and confirm that, to the best of my knowledge, information and belief, the work detailed therein was carried out by the Receiver, and that such work was necessary to the Receiver in carrying out its duties and obligations in relation to this matter pursuant to the Receivership Order and the provisions of the *Bankruptcy and Insolvency Act* (the "*BIA*").

## C. Osler's Invoices

12. The Receiver engaged Osler, Hoskin & Harcourt LLP ("Osler") to assist it in carrying out its duties and obligations in these proceedings pursuant to the Receivership Order and the *BIA*. I have reviewed the complete invoices of Osler that were issued between the period March 21, 2024 and September 19, 2025 (the "Osler Invoices"). I am satisfied that the work detailed therein was completed by Osler at the request of the Receiver and was necessary in the receivership proceedings.

- 13. I believe based on my experience as a Licensed Insolvency Trustee that the fees and rates charged by Osler and reflected in Osler Invoices are consistent with those charged by other law firms for work of a similar nature and complexity in British Columbia.
- 14. I made this affidavit expressly for the purposes of the Receiver's application to approve the work carried out by the Receiver in these proceedings, and the fees and disbursements under the Receiver Invoices and Osler Invoices, and for no other purpose. Nothing herein is intended to be a waiver of solicitor-client privilege by the Receiver.

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AFFIRMED BEFORE ME at Vancouver, British Columbia, on November 6, 2025.

A Commissioner for taking Affidavits for British Columbia

TOMPOWELL

CHRISTIAN GARTON

BARRISTER & SOLICITOR

Osler, Hoskin & Harcourt LLP

Suite 3000, Bentall Four 1055 Dunamult Street Vancouver, BC V7X 1K8 TELEPHONE: 804,492,2712 This Exhibit "A" referred to in the Affidavit #1 of Tom Powell made before me at Vancouver this 6th day of November, 2025

A Commissioner for taking Affidavits for British Columbia



## Invoice Remittance

1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street Suite 1450 Vancouver, BC V7Y 1B6 Canada Invoice No. 102900001094
Job No. 500001.1768
Terms Due Upon Receipt
Currency CAD
Tax Registration:

**RE:** Receivership

Current Invoice Period: Charges posted through March 31, 2024

Amount Due Current Invoice \$73,062.91

**Bank Information** 

Please indicate our invoice number with your remittance

Account Name: FTI Consulting Canada Inc.
Bank Name: Bank of Nova Scotia

Bank Address: Scotia Plaza, 44 King Street West

Toronto, Ontario M5H 1H1

Canada

Bank Code: 002
Account Number: 0861715
Swift/BIC Code: NOSCCATT

Transit Code: 47696 Account Currency: CAD

Please remit cheque FTI Consulting Canada Inc.

payments to: C/O T10073

P.O. Box 10073 Postal Station A

Toronto, ON M5W 2B1



March 31, 2024 1326 Mann Farms Inc. Invoice No. 102900001094 c/o FTI Consulting Canada Inc. Job No. 500001.1768 701 West Georgia Street **Terms Due Upon Receipt Suite 1450** Currency CAD Vancouver, BC V7Y 1B6 **Tax Registration:** Canada

**RE:** Receivership

Current Invoice Period: Charges posted through March 31, 2024

Name	Title	Rate	Hours	Total
Thomas Powell	Senior Managing Director	\$990.00	12.80	\$12,672.00
Michael Clark	Senior Director	\$800.00	69.10	\$55,280.00
Huw Parks	Senior Consultant	\$600.00	0.60	\$360.00
Caitlin Moreland	Administrative Professional	\$155.00	1.60	\$248.00
<b>Total Professional Serv</b>	vices		84.10	\$68,560.00
Expenses				Total
Business Meals				\$95.47
Car Rental				\$195.02
Delivery & Courier				\$183.40
Gasoline				\$53.72
Parking				\$140.17
Purchased Services				\$341.25
Taxi				\$14.69
<b>Total Expenses</b>				\$1,023.72

Invoice Total	CAD Amount
	\$69,583.72
GST (5%)	\$3,479.19
Total Due	\$73,062.91

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada



March 31, 2024 Invoice No. 102900001094 Job No. 500001.1768

Total Professional Services
Thomas Powell

03/08/2024 03/11/2024	Prepare to take possession; visit site Attending sites to take possession; initial activities		4.80 6.50	
03/25/2024	Security; banking matters; internal discussions with N	1. Clark; correspond	1.00	
03/28/2024	with E. Welte Security; banking matters; internal discussions with N with E. Welte	1. Clark; correspond	0.50	
	\$990.00	per hour x total hrs	12.80	\$12,672.00

## **Michael Clark**

03/04/2024	Attend to preparations for Receivership appointment	4.30
03/05/2024	Review materials; draft receivership planning documents; review email correspondence re. same	4.50
03/06/2024	Attend to preparations for receivership application; attend sites and take pictures	6.80
03/08/2024	Attend at site upon appointment and review initial update to National Bank	4.80
03/11/2024	Attend to statutory duties including Notice of Receiver and creditor list;	7.80
	attend to website matters; prepare for meeting with G. Mann; attend meeting with G. Mann in Surrey, BC.	
03/12/2024	attend to information request to G. Mann; attend to insurance	3.80
	documentation,; consider security options	
03/13/2024	Attend to insurance matters; attend to security matters; attend to property	5.30
	evaluation matters re. consultant; attend call with Osler re. update	
03/14/2024	Attend to statement of receiver; call G. Mann and send follow up email; draft update email to NBC	3.80
03/15/2024	Attend to notice requirements; Organize meeting with farming consultant;	4.80
	review proposal from farming consultant; attend to draft update to NBC; follow up on insurance	
03/18/2024	Attend call with Osler and FCC; internal discussions re. same; call with P.	1.30
	Powers re. warehouse at 8201 Dyke Rd.; follow up with G. Mann via	
	telephone and email	
03/19/2024	Prepare for meeting with farming consultant; call BFL re. insurance; attend to	1.80
	email correspondence with G. Mann re. site visits	
03/20/2024	Attend all three farm properties with farming consultant; draft update to T. Powell	7.80

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada



Invoice Detail		Invoice No. Job No.		March 31, 2024 102900001094 500001.1768
03/21/2024	Attend to tenant matters re. 8201 Dyke Rd. property; usharesite; attend to insurance matters	pload pictures to	1.30	
03/22/2024				
03/25/2024	Attend call with NBC re. update; attend call with tenan equipment	t; call bailiff re.	1.30	
03/26/2024	Attend to banking matters; call tenant; attend to insurar	nce matters	1.80	
03/27/2024	Call with P. Powers re. move equipment; attend to bank 1326 Mann Farm Inc.		1.30	
03/28/2024	Review email correspondence from TD; internal discusto email correspondence from P. Powers re. equipment re. warehouse tour; attend to email from B. French re. 1	; Call and email tenant	2.80	
	\$800.00	per hour x total hrs	69.10	\$55,280.00
Huw Parks 03/14/2024 03/15/2024 03/18/2024	Provision of creditor notice to TPH.  Call with IT to get send as access for shared mailbox.  Distributing creditor notices to directors		0.20 0.20 0.20	
	\$600.00	per hour x total hrs	0.60	\$360.00
O3/05/2024 03/11/2024 03/15/2024	Web update requested by Mike Clark Web update requested by Mike Clark Web update requested by Mike Clark		0.50 0.50 0.30	
03/18/2024	Web update requested by Mike Clark		0.30	
	\$155.00	per hour x total hrs	1.60	\$248.00
				0.0.50.00

**Total Professional Services** 

CAD

\$68,560.00



## Invoice Remittance

May 07, 2024
1326 Mann Farms Inc.
Invoice No. 102900001208
c/o FTI Consulting Canada Inc.
Job No. 500001.1768
701 West Georgia Street
Terms Due Upon Receipt
Suite 1450
Currency CAD
Vancouver, BC V7Y 1B6

Canada

**RE:** Receivership

Current Invoice Period: Charges posted through April 30, 2024

**Amount Due Current Invoice** 

\$53,339.56

**Bank Information** 

Please indicate our invoice number with your remittance

Account Name: FTI Consulting Canada Inc. Bank Code: 002
Bank Name: Bank of Nova Scotia Account Number: 0861715
Bank Address: Scotia Plaza, 44 King Street West Swift/BIC Code: NOSCCATT

Toronto, Ontario M5H 1H1 Transit Code: 47696 Canada Account Currency: CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque FTI Consulting Canada Inc.

payments to: C/O T10073 P.O. Box 10073

P.O. Box 10073 Postal Station A

Toronto, ON M5W 2B1



1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street Suite 1450 Vancouver, BC V7Y 1B6 Canada Invoice No.
Job No.
Terms
Currency
Tax Registration:

May 07, 2024 102900001208 500001.1768 Due Upon Receipt CAD

**RE:** Receivership

Current Invoice Period: Charges posted through April 30, 2024

Name	Title	Rate	Hours	Total
Thomas Powell	Senior Managing Director	\$990.00	9.30	\$9,207.00
Michael Clark	Managing Director	\$840.00	45.10	\$37,884.00
Huw Parks	Director	\$690.00	3.80	\$2,622.00
Brandi Swift	Consultant	\$370.00	2.10	\$777.00
Caitlin Moreland	Administrative Professional	\$155.00	0.50	\$77.50
Total Professional Serv	vices		60.80	\$50,567.50
Expenses				Total
Car Rental				\$219.42
Gasoline				\$12.66
Total Expenses				\$232.08

Invoice Total	CAD Amount
	\$50,799.58
GST (5%)	\$2,539.98
Total Due	\$53,339.56



May 07, 2024 Invoice No. 102900001208 Job No. 500001.1768

Total Professional Services
Thomas Powell

	\$990.00 per hour x total hrs	9.30	\$9,207.00
04/26/2024	Marketing matters; review of proposals; meetings with agricultural consultant	0.50	
04/23/2024	Marketing matters; review of proposals; meetings with agricultural consultant	1.20	
04/22/2024	Marketing matters; review of proposals; meetings with agricultural consultant	1.00	
04/19/2024	Analyze realtor proposals; discussions with NBC	0.60	
04/08/2024	oversight Discussions with NBC; provide receivership update; discussions with counsel	1.50	
04/05/2024	oversight Review draft report; discussions with G. Mann and his legal counsel; file	1.00	
04/04/2024	oversight Review draft report; discussions with G. Mann and his legal counsel; file	1.50	
04/03/2024	oversight Review draft report; discussions with G. Mann and his legal counsel; file	1.20	
04/02/2024	Review draft report; discussions with G. Mann and his legal counsel; file	0.80	

### **Michael Clark**

04/01/2024	Correspondence with existing Realtor; draft communications to other Realtors; review banking transactions; internal discussions re. same; attend call with G. Mann; Arrange equipment move with AE Bailiffs	5.80
04/02/2024	Attend site to perform walk-through of warehouse; attend to outline of draft update to NBC; draft update to NBC	6.30
04/03/2024	Attend to draft update to NBC	5.30
04/04/2024	Finalize update to NBC;	3.30
04/08/2024	Prepare for call with NBC; attend call with NBC; internal discussions re.	2.80
	same; review email correspondence from realtors; correspondence with Osler re. FCC communications	
04/09/2024	Attend call with Osler re. approach with FCC; internal discussions re. same; review insurance quote; review email correspondence from Osler re. receivership	1.50
04/12/2024	Review realtor proposal deck for finalization	0.80
04/15/2024	Review and finalize update to NBC; email correspondence with J. Banwait	1.80
	and other realtors	
04/16/2024	Call with environmental consultant re. next steps	0.50
04/17/2024	Attend to email correspondence; review creditor inquiries	0.30

FTI Consulting Canada, Inc.

TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box  $104\,$ 



Invoice Detail		Invoice No. Job No.		May 07, 2024 102900001208 500001.1768
04/18/2024	Attend to sale process matters; attend to banking mainquiries	tters; review creditor	2.10	
04/19/2024	•			
04/22/2024	Meet with B. French (farming consultant) to discuss Landquest re. realtor proposal	options re. crops; call	1.80	
04/23/2024	Attend to creditor inquiries		0.30	
04/24/2024	Attend to creditor inquiries; preparations for site visi	t	0.80	
04/25/2024	Attend site visit; document visit; internal discussions	s re. status	4.80	
04/29/2024	Call with B. French re. maintenance of farms; attend matters; Call with Oslers re. status; Review proposal		2.30	
04/30/2024	Review email correspondence re. realtor contract; at matters	tend to insurance related	1.30	
	\$840.00	per hour x total hrs	45.10	\$37,884.00

## **Huw Parks**

		\$690.00	per hour x total hrs	3.80	\$2,622.00
04/02/2024	Site visit			3.80	

## **Brandi Swift**

04/04/2024	Bank account setup - National Bank		1.80	
	OSB correspondence			
04/16/2024	Bank account setup/payment processing		0.30	
	\$370.00	per hour x total hrs	2.10	\$777.00

## **Caitlin Moreland**

04/03/2024	Web update requested by Mike Clark		0.50		
	\$155.00	per hour x total hrs	0.50	\$77.50	

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada



Invoice No. Job No. May 07, 2024 102900001208 500001.1768

Total Professional Services CAD \$50,567.50



## Invoice Remittance

June 07, 2024 1326 Mann Farms Inc. Invoice No. 102900001327 500001.1768 c/o FTI Consulting Canada Inc. Job No. 701 West Georgia Street **Due Upon Receipt** Terms **Suite 1450** Currency **CAD Tax Registration:** 

Vancouver, BC V7Y 1B6

Canada

**RE: Receivership** 

Current Invoice Period: Charges posted through May 31, 2024

**Amount Due Current Invoice** \$33,460.98

**Bank Information** 

Please indicate our invoice number with your remittance

**Account Name:** FTI Consulting Canada Inc. Bank Code: 002 Bank Name: **Bank of Nova Scotia Account Number:** 0861715 **Bank Address:** Scotia Plaza, 44 King Street West **Swift/BIC Code: NOSCCATT** 

Toronto, Ontario M5H 1H1 **Transit Code:** 47696 Canada **Account Currency: CAD** 

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque FTI Consulting Canada Inc.

payments to: C/O T10073 P.O. Box 10073

**Postal Station A** 

Toronto, ON M5W 2B1



1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street Suite 1450 Vancouver, BC V7Y 1B6 Canada Invoice No.
Job No.
Terms
Currency

June 07, 2024 102900001327 500001.1768 Due Upon Receipt CAD

**Tax Registration:** 

**RE:** Receivership

Current Invoice Period: Charges posted through May 31, 2024

Name	Title	Rate	Hours	Total
Thomas Powell	Senior Managing Director	\$990.00	3.00	\$2,970.00
Michael Clark	Managing Director	\$840.00	32.90	\$27,636.00
Brandi Swift	Consultant	\$370.00	3.00	\$1,110.00
<b>Total Professional Ser</b>	vices		38.90	\$31,716.00
Expenses				Total
Car Rental				\$64.25
Delivery & Courier				\$25.39
Miscellaneous Expense				\$15.66
Taxi				\$46.30
Total Expenses				\$151.60

Invoice Total	CAD Amount
	\$31,867.60
GST (5%)	\$1,593.38
Total Due	\$33,460.98



June 07, 2024
Invoice No. 102900001327
Job No. 500001.1768

**Total Professional Services Thomas Powell** 

05/07/2024	Discussion with FCC and Oslers; internal follow-up di	scussion	0.50	
05/23/2024	Realtor matters; discussions with counsel; internal discussions with M. Clark			
05/24/2024	Realtor matters; discussions with counsel; internal discussions with M. Clark		0.70	
05/31/2024	Listing agreement matters		0.80	
	\$990.00	per hour x total hrs	3.00	\$2,970.00

## **Michael Clark**

05/01/2024	Attend to email correspondence with realtors	0.20
05/02/2024	Call with CRA; attend to insurance matters; attend to equipment matters; draft	3.80
	email to Farm Credit Canada re. plant maintenance; review email from Osler	
	re. realtor contract; draft email to current listing agent re termination	
05/03/2024	attend to insurance matters; review email correspondence from P. Powers;	2.50
	prepare summary of seized assets	
05/06/2024	Review payment requests; attend to email correspondence with farming	0.80
	consultant re. next steps; attend to creditor inquiries; draft agenda for meeting	
	with FCC; internal discussions re. same	
05/07/2024	Prepare for call with FCC; attend call with FCC; call farming consultant; draft	3.80
	email to FCC; attend to equipment matters	
05/08/2024	Attend to property sale matters; review engagement letter re. appraisal; attend	0.80
	to email correspondence with Osler re. security opinion	
05/09/2024	Attend to insurance matters; attend to sale process matters re. realtor contract	0.80
	cancellation	
05/10/2024	Attend to sale process matters; attend to security matters	1.80
05/13/2024	Attend to email correspondence re. security opinion/increased security	1.80
	patrols/insurance/listing cancellation; attend call with realtor	
05/21/2024	Attend to email correspondence re. clean up of site/listing agreement; call	1.80
	with B. French re. site issues; call with P. Powers re. site clean up	
05/22/2024	Review summary of activities provided by farming consultant; review listing	1.30
	agreement and provide comments	
05/23/2024	Attend to property management matters; review appraisal	1.30
05/24/2024	Review listing contract and schedules; attend to email correspondence	1.80
05/27/2024	Email correspondence and call with P. Powers re. clean-up; attend to draft	5.80
	update to NBC; review and sign listing agreement documents from LandQuest	

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

\$31,716.00



Invoice Detail		Invoice No. Job No.		June 07, 2024 102900001327 500001.1768
05/28/2024	Attend to email correspondence re. Farm Credit; pro	<u> </u>	2.80	
	prepare draft statement of receipts and disbursemen	ts; internal discussions re.		
05/20/2024	same		0.50	
05/29/2024	attend to email correspondence re. site matters		0.50	
05/31/2024	Attend to update to NBC		1.30	
	\$840.00	per hour x total hrs	32.90	\$27,636.00
Brandi Swift				
<b>Brandi Swift</b> 05/21/2024	Bank account setup/payment processing		0.30	
	Bank account setup/payment processing Bank account setup/payment processing		0.30 1.00	
05/21/2024				
05/21/2024 05/22/2024	Bank account setup/payment processing		1.00	

**Total Professional Services** 

CAD



## Invoice Remittance

July 11, 2024
1326 Mann Farms Inc.
Invoice No. 102900001413
c/o FTI Consulting Canada Inc.
Job No. 500001.1768
701 West Georgia Street
Terms Due Upon Receipt
Suite 1450
Currency CAD
Vancouver, BC V7Y 1B6

Canada

**RE:** Receivership

Current Invoice Period: Charges posted through June 30, 2024

**Amount Due Current Invoice** 

\$12,712.65

**Bank Information** 

Please indicate our invoice number with your remittance

Account Name: FTI Consulting Canada Inc. Bank Code: 002
Bank Name: Bank of Nova Scotia Account Number: 0861715
Bank Address: Scotia Plaza, 44 King Street West Swift/BIC Code: NOSCCATT

Toronto, Ontario M5H 1H1 Transit Code: 47696
Canada Account Currency: CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque FTI Consulting Canada Inc.

payments to: C/O T10073 P.O. Box 10073

P.O. Box 10073
Postal Station A

Toronto, ON M5W 2B1



1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street Suite 1450 Vancouver, BC V7Y 1B6 Canada Invoice No.
Job No.
Terms
Currency
Tax Registration:

July 11, 2024 102900001413 500001.1768 Due Upon Receipt CAD

**RE: Receivership** 

Current Invoice Period: Charges posted through June 30, 2024

Name	Title	Rate	Hours	Total
Thomas Powell	Senior Managing Director	\$990.00	0.50	\$495.00
Michael Clark	Managing Director	\$840.00	13.10	\$11,004.00
Brandi Swift	Consultant	\$370.00	1.60	\$592.00
<b>Total Professional Ser</b>	vices		15.20	\$12,091.00
Expenses				Total
Purchased Services				\$16.28
Total Expenses				\$16.28

Invoice Total	CAD Amount
	\$12,107.28
GST (5%)	\$605.37
Total Due	\$12,712.65



Invoice No. Job No. July 11, 2024 102900001413 500001.1768

Total Professional Services
Thomas Powell

06/07/2024 Internal discussions with M. Clark regarding status of listing and clean-up

0.50

matters

\$990.00 per hour x total hrs 0.50 \$495.00

### **Michael Clark**

06/03/2024	Attend to security related matters		0.50	
06/04/2024	Email correspondence re site clean-up		0.20	
06/06/2024	Review security opinion in advance of call with Osler;	consider approach on	0.80	
	leased assets; call with P. Powers re. site clean-up			
06/07/2024	Attend call with Osler re. foreclosure proceedings; into	ernal discussions re	1.00	
	next steps			
06/10/2024	Attend to email correspondence re. foreclosure proceed	dings	0.30	
06/11/2024	Attend to email correspondence re. site clean up; revie	w email	1.00	
	correspondence from Osler re. foreclosure proceedings	s; internal discussions		
	re. same; call Osler re. Mission property			
06/13/2024	Attend call with B French; follow up with BC Hydro		0.30	
06/14/2024	Attend call with P. Powers re. site clean up		0.30	
06/17/2024	attend to contacting auction houses re. mobile equipme	ent; investigate sale of	1.50	
	Mission property			
06/24/2024	attend to leased asset matters; attend to payment matte	rs	1.30	
06/25/2024	Attend to banking matters; follow up with auctioneers	re. proposals; attend to	1.80	
	creditor inquiries			
06/27/2024	Attend to tax matters; attend to property matters		1.80	
06/28/2024	Attend to email correspondence with Osler re. leased a	ssets; calls with	2.30	
	auctioneers re. auction proposals; call with City of Ab	ootsford; review email		
	correspondence re. property taxes owing; internal disc	ussions re. same		
	\$840.00	per hour x total hrs	13.10	\$11,004.00

### **Brandi Swift**

 06/24/2024
 Payment processing
 0.30

 06/26/2024
 Payment processing
 0.30

FTI Consulting Canada, Inc.

TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104

Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com



Invoice No. Job No.

July 11, 2024 102900001413 500001.1768

06/27/2024 Payment processing 1.00

\$370.00 per hour x total hrs 1.60 \$592.00

Total Professional Services CAD \$12,091.00

102900001604

500001.1768

**CAD** 



## Invoice Remittance

**September 06, 2024** 1326 Mann Farms Inc. Invoice No. c/o FTI Consulting Canada Inc. Job No. 701 West Georgia Street **Due Upon Receipt** Terms **Suite 1450** Currency Vancouver, BC V7Y 1B6 **Tax Registration:** 

Canada

Re: Receivership

Current Invoice Period: Charges posted through August 31, 2024

**Amount Due Current Invoice** 

\$51,194.07

**Bank Information** 

Please indicate our invoice number with your remittance

**Account Name:** FTI Consulting Canada Inc. Bank Code: 002 Bank Name: **Bank of Nova Scotia Account Number:** 0861715 **Bank Address:** Scotia Plaza, 44 King Street West **Swift/BIC Code: NOSCCATT** 

> Toronto, Ontario M5H 1H1 **Transit Code:** 47696 Canada **Account Currency: CAD**

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque FTI Consulting Canada Inc.

payments to: C/O T10073 P.O. Box 10073

**Postal Station A** 

Toronto, ON M5W 2B1



1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street Suite 1450 Vancouver, BC V7Y 1B6 Canada Invoice No.
Job No.
Terms
Currency
Tax Registration:

September 06, 2024 102900001604 500001.1768 Due Upon Receipt CAD

Re: Receivership

Current Invoice Period: Charges posted through August 31, 2024

Name	Title	Rate	Hours	Total
Thomas Powell	Senior Managing Director	\$990.00	5.50	\$5,445.00
Michael Clark	Managing Director	\$840.00	50.20	\$42,168.00
Brandi Swift	Consultant	\$370.00	2.50	\$925.00
Kathleen Foster	Executive Assistant II	\$125.00	0.50	\$62.50
<b>Total Professional Servi</b>	ces		58.70	\$48,600.50
Expenses				Total
Delivery & Courier				\$47.11
Taxi				\$108.65
<b>Total Expenses</b>				\$155.76

Invoice Total	CAD Amount
	\$48,756.26
GST (5%)	\$2,437.81
Total Due	\$51,194.07



September 06, 2024
Invoice No. 102900001604
Job No. 500001.1768

**Total Professional Services Thomas Powell** 

08/12/2024	Prepare for and attend update call with Oslers regardin	g FCC discussions and	1.60	
	property transaction; discuss operations and sales statu	s with M. Clark; review		
	draft statement of receipts and disbursements			
08/22/2024	Update for the bank; discussion re excluded assets		2.40	
08/23/2024	Update for the bank; discussion re excluded assets		1.00	
08/29/2024	Meeting with counsel and NBC counsel re excluded as	sets and related matters	0.50	
	\$990.00	per hour x total hrs	5.50	\$5,445.00

## **Michael Clark**

07/02/2024	Review auction proposals	0.40
07/03/2024	Review cash offer from Active Auction Mart as against the appraisal; call	0.80
	with Active Auction Mart	
07/04/2024	attend to security matters; draft email to FCC re. equipment sale and status	1.30
	update	
07/05/2024	Attend to equipment sale matters	0.80
07/09/2024	Call with Active Auction Mart re. offer; call and email with counsel to FCC	0.80
	re. AAM Offer	
07/10/2024	Attend to equipment sale matters; call with B. French re. site matters	1.80
07/11/2024	Review bill of sale and send to AAM; email correspondence re. same	1.30
07/18/2024	Attend to contractor matters	0.30
07/19/2024	Attend to contractor matters	0.30
07/22/2024	attend to equipment sale process matters	1.80
07/23/2024	attend to equipment sale matters; review correspondence re city of	1.80
	Abbotsford	
07/24/2024	Attend to equipment sale matters; attend call with Blakes and Osler re.	1.50
	property sale	
07/25/2024	Attend call with realtor re. \$4 million offer; coordinate payouts re. sold	0.50
	equipment	
07/26/2024	Attend to equipment sale matters re. payouts	0.30
07/29/2024	Attend to equipment sale matters	0.30
07/30/2024	Attend to voicemail/email correspondence re. site maitenance	0.20
08/07/2024	update statement of receipts and disbursements; review proposed payments;	3.30
	call with B. French re. plant maintenance; review email correspondence re.	
	equipment sale; review payout notice from TD	
	* *	

FTI Consulting Canada, Inc.

TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104



Invoice Detail		Invoice No. Job No.	_	mber 06, 2024 102900001604 500001.1768
08/08/2024	attend to update to FCC; call and email corresponden Abbotsford re property taxes	ce with City of	3.30	
08/09/2024	attend to FCC update; review correspondence re. miss discussions and call with Osler re. Mission property	sion property; internal	4.30	
08/12/2024	attend call with Osler re. Mission Property; internal d	iscussions re next steps	0.80	
08/13/2024	attend to FCC update		1.30	
08/14/2024	attend to FCC update; review BC hydro invoice		2.80	
08/15/2024	attend to NBC update; correspondence with B French	re Hydro	1.80	
08/16/2024	Attend to NBC Update; correspondence with realtor		1.30	
08/19/2024	review details provided by realtor; attend to NBC upon	late	1.30	
08/20/2024	call BC Hydro re. invoices; email correspondence re.	same	0.80	
08/21/2024	Visit Dhaliwal Law Office in Surrey re Mission Propre same; attend to NBC Update	erty; internal discussions	3.50	
08/22/2024	Attend call with Osler re. next steps on Mission Propo NBC update	erty; attend to review of	2.80	
08/23/2024	Attend call with NBC; attend to preparations for a 13	Mann bankruptcy	4.30	
08/26/2024	Attend to preparations for a 13 Mann bankruptcy		2.30	
08/27/2024	Attend to BC hydro communications; follow up with review Osler email correspondence re. NBC update	OSB re. bankruptcy;	0.80	
08/29/2024	Attend call with Osler/Blakes re. next steps on Missic addresses/contacts for directors of 13 Mann	on Property; review	1.30	
	\$840.00	per hour x total hrs	50.20	\$42,168.00

### **Brandi Swift**

		\$370.00	per hour x total hrs	2.50	\$925.00
08/12/2024	Payment processing			1.20	
07/31/2024	Payment processing			0.50	
07/29/2024	Payment processing			0.80	

## **Kathleen Foster**

08/30/2024	Web update for Mann Farms		0.50		
		\$125.00	per hour x total hrs	0.50	\$62.50



Invoice No. Job No.

September 06, 2024 102900001604 500001.1768

Total Professional Services CAD \$48,600.50



## Invoice Remittance

October 09, 2024
1326 Mann Farms Inc. Invoice No. 102900001727
c/o FTI Consulting Canada Inc. Job No. 500001.1768
701 West Georgia Street Terms Due Upon Receipt
Suite 1450 Currency CAD

Vancouver, BC V7Y 1B6 Tax Registration:

Canada

Re: Receivership

Current Invoice Period: Charges posted through September 30, 2024

Amount Due Current Invoice \$8,568.00

**Bank Information** 

Please indicate our invoice number with your remittance

Account Name: FTI Consulting Canada Inc. Bank Code: 002
Bank Name: Bank of Nova Scotia Account Number: 0861715
Bank Address: Scotia Plaza, 44 King Street West Swift/BIC Code: NOSCCATT

Toronto, Ontario M5H 1H1 Transit Code: 47696
Canada Account Currency: CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque FTI Consulting Canada Inc.

payments to: C/O T10073 P.O. Box 10073

P.O. Box 10073 Postal Station A

Toronto, ON M5W 2B1



1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street Suite 1450 Vancouver, BC V7Y 1B6 Canada Invoice No.
Job No.
Terms
Currency
Tax Registration:

October 09, 2024 102900001727 500001.1768 Due Upon Receipt CAD

Re: Receivership

Current Invoice Period: Charges posted through September 30, 2024

Name	Title	Rate	Hours	Total
Thomas Powell	Senior Managing Director	\$990.00	4.00	\$3,960.00
Michael Clark	Managing Director	\$840.00	5.00	\$4,200.00
Total Professional Serv	ices		9.00	\$8,160.00

Invoice Total	CAD Amount
	\$8,160.00
GST (5%)	\$408.00
Total Due	\$8,568.00



October 09, 2024
Invoice No. 102900001727
Job No. 500001.1768

Total Professional Services

**Thomas Powell** 

	Update on excluded assets; discussion with Blakes; disc		1.50	
	Discussion and catch-up with Oslers re Mann examination	on	1.00	
09/24/2024	Provide update to E. Welte re examination \$990.00	per hour x total hrs	0.50 <b>4.00</b>	\$3,960.00

## **Michael Clark**

09/05/2024	Attend call with Blakes re. Excess Process	0.50	
09/06/2024	Attend to update on receivership	0.80	
09/06/2024	Review cash flow variance analysis	0.50	
09/18/2024	Review offer on 8201 Dyke Rd.; draft update to NBC	0.80	
09/20/2024	Review offer received on Abbotsford Property; review contract with	1.30	
	Landquest; calls with Landquest re. offer received		
09/24/2024	Attend to insurance matters	0.30	
09/24/2024	Reverse time	-1.30	
09/24/2024	Review receivership application materials; call with BHL re. next steps	1.30	
09/25/2024	Attend to claims process matters re equinox	-1.30	
09/25/2024	Attend to claims process matters re equinox	1.30	
09/25/2024	Attend to correspondence with realtor; call BC Hydro re outstanding invoices	0.80	
	\$840.00 per hour x total hrs	5.00	\$4,200.00

Total Professional Services	CAD	\$8,160.00



## Invoice Remittance

1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street **Suite 1450** Vancouver, BC V7Y 1B6

Invoice No. Currency **Tax Registration:** 

Job No.

Terms

November 11, 2024 102900001813 500001.1768 **Due Upon Receipt CAD** 

Re: Receivership

Canada

Current Invoice Period: Charges posted through October 31, 2024

**Amount Due Current Invoice** 

\$12,050.85

**Bank Information** 

Please indicate our invoice number with your remittance

**Account Name:** Bank Name: **Bank Address:** 

FTI Consulting Canada Inc.

**Bank of Nova Scotia** 

Scotia Plaza, 44 King Street West Toronto, Ontario M5H 1H1

Canada

Bank Code: 002 **Account Number:** 

0861715 Swift/BIC Code: **NOSCCATT** 

**Transit Code:** 47696 **Account Currency: CAD** 

Please forward remittance advice to AR.Support@fticonsulting.com

Please remit cheque payments to:

FTI Consulting Canada Inc.

C/O T10073 P.O. Box 10073 **Postal Station A** 

Toronto, ON M5W 2B1



1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street Suite 1450 Vancouver, BC V7Y 1B6 Canada Invoice No.
Job No.
Terms
Currency
Tax Registration:

November 11, 2024 102900001813 500001.1768 Due Upon Receipt CAD

Re: Receivership

Current Invoice Period: Charges posted through October 31, 2024

Name	Title	Rate	Hours	Total
Thomas Powell	Senior Managing Director	\$1,070.00	4.10	\$4,387.00
Michael Clark	Managing Director	\$850.00	7.90	\$6,715.00
Tessa Chiricosta	Consultant	\$375.00	1.00	\$375.00
Total Professional Serv	rices		13.00	\$11,477,00

Invoice Total	CAD Amount
	\$11,477.00
GST (5%)	\$573.85
Total Due	\$12,050.85



Invoice Detail		November 11, 2024
Invoice Detail	Invoice No.	102900001813
	Job No.	500001.1768

**Total Professional Services** 

**Thomas Powell** 

	\$1,070.00	per hour x total hrs	4.10	\$4,387.00
	Blakes and NBC			
10/31/2024	Discussions regarding guarantor matters; prepare for and attend meeting with		1.00	
10/25/2024	Langley property matters; discussions with Osler and Blakes		0.80	
10/24/2024	Langley property matters; discussions with Osler and Blakes		0.50	
10/07/2024	13 Mann matters re guarantors; foreclosure proceedings and related matters		1.80	

## Michael Clark

10/09/2024	Review and sign affidavit re. Langley property		1.00	
10/11/2024	Discussions with Osler re. court application		0.30	
10/25/2024	Attend to update to NBC; attend call with Osler/Blakes; review sale		4.30	
	agreement; internal discussions re. same			
10/28/2024	Update NBC report; review email correspondence re. Langley Property		2.30	
	\$850.00	per hour x total hrs	7.90	\$6,715.00

## Tessa Chiricosta

		\$375.00	per hour x total hrs	1.00	\$375.00
10/24/2024	BY Hydro Payment			0.50	
10/08/2024	BC Hydro payment			0.50	

Total Professional Services	CAD	\$11,477.00

CAD



### Invoice Remittance

December 11, 2024 1326 Mann Farms Inc. 102900001921 Invoice No. 500001.1768 c/o FTI Consulting Canada Inc. Job No. 701 West Georgia Street **Due Upon Receipt Terms Suite 1450** Currency Vancouver, BC V7Y 1B6 **Tax Registration:** 

Canada

Re: Receivership

Current Invoice Period: Charges posted through November 30, 2024

**Amount Due Current Invoice** \$9,188.55

**Bank Information** 

Please indicate our invoice number with your remittance

**Account Name:** FTI Consulting Canada Inc. Bank Code: 002 Bank of Nova Scotia **Bank Name: Account Number:** 0861715 **Bank Address:** Scotia Plaza, 44 King Street West Swift/BIC Code: **NOSCCATT** 

> Toronto, Ontario M5H 1H1 **Transit Code:** 47696 Canada **Account Currency: CAD**

Please forward remittance advice to AR.Support@fticonsulting.com.

FTI Consulting Canada Inc. Please remit cheque

payments to: C/O T10073 P.O. Box 10073

**Postal Station A** 

Toronto, ON M5W 2B1



1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street Suite 1450 Vancouver, BC V7Y 1B6 Canada Invoice No.
Job No.
Terms
Currency
Tax Registration:

December 11, 2024 102900001921 500001.1768 Due Upon Receipt CAD

Re: Receivership

Current Invoice Period: Charges posted through November 30, 2024

Name	Title	Rate	Hours	Total
Thomas Powell	Senior Managing Director	\$1,070.00	2.30	\$2,461.00
Michael Clark	Managing Director	\$850.00	7.40	\$6,290.00
Total Professional Ser	vices		9.70	\$8,751.00

Invoice Total	CAD Amount
	\$8,751.00
GST (5%)	\$437.55
Total Due	\$9,188.55



December 11, 2024
Invoice No. 102900001921
Job No. 500001.1768

**Total Professional Services** 

**Thomas Powell** 

•	\$1,070.00	per hour x total hrs	2.30	\$2,461.00
11/29/2024	Mann Farms matters		1.70	
11/08/2024	Matter relating to the guarantor		0.20	
11/07/2024	Matter relating to the guarantor		0.40	

#### **Michael Clark**

	\$850.00	per hour x total hrs	7.40	\$6,290.00
	offer			
11/29/2024	Call with Landquest re. offer received; review docum	entation received re.	0.50	
11/28/2024	Attend to insurance matters		0.30	
11/27/2024	Attend call with M. Buttery re. Langley Property; rev	iew proposed payments	0.50	
11/21/2024	Review proposed payments		0.30	
11/18/2024	Review email correspondence re. FCC letter		0.30	
	agreement amendment			
11/14/2024	Correspondence with Landquest re. revised list price;	preview listing	0.80	
11/13/2024	Prepare for and attend call with NBC		0.80	
,,,-	update		-100	
11/12/2024	attend to site matters re. hydro; review payments; org	anize call to review NBC	1.30	
	Property re. potential purchaser; attend to insurance n interested party for farms	natters; call with		
11/08/2024	Follow up on update deck to NBC; review correspond	<b>.</b>	1.30	
11/00/2024	to email correspondence re. leased F350		1.20	
11/05/2024	Review letter to FCC counsel; review email correspond	ndence re. same; attend	0.80	
11/04/2024	Attend to insurance matters		0.50	

Total Professional Services	CAD	\$8,751.00

January 08, 2025 102900001994

**Due Upon Receipt** 

500001.1768

**CAD** 



### Invoice Remittance

1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street Suite 1450

Vancouver, BC V7Y 1B6

Canada

Re: Receivership

Current Invoice Period: Charges posted through December 31, 2024

**Amount Due Current Invoice** 

\$3,231.38

Invoice No.

Job No.

Currency

**Tax Registration:** 

Terms

**Bank Information** 

Please indicate our invoice number with your remittance

Account Name: FTI Consulting Canada Inc.

Bank Name: Bank of Nova Scotia
Bank Address: Scotia Plaza, 44 King Street West

Toronto, Ontario M5H 1H1

Canada

Bank Code: 002

Account Number: 0861715 Swift/BIC Code: NOSCCATT

Transit Code: 47696 Account Currency: CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque FTI Consulting Canada Inc.

payments to: C/O T10073

P.O. Box 10073 Postal Station A

Toronto, ON M5W 2B1



1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street Suite 1450 Vancouver, BC V7Y 1B6 Canada Invoice No.
Job No.
Terms
Currency
Tax Registration:

January 08, 2025 102900001994 500001.1768 Due Upon Receipt CAD

Re: Receivership

Current Invoice Period: Charges posted through December 31, 2024

Name	Title	Rate	Hours	Total
Michael Clark	Managing Director	\$850.00	3.40	\$2,890.00
Brandi Swift	Consultant	\$375.00	0.50	\$187.50
Total Professional Services			3.90	\$3.077.50

Invoice Total	CAD Amount
	\$3,077.50
GST (5%)	\$153.88
Total Due	\$3,231.38



January 08, 2025 Invoice No. 102900001994 Job No. 500001.1768

Total Professional Services Michael Clark

12/02/2024	Draft summary of offer to NBC; attend to email corr	espondence re. same	1.30	
12/03/2024	review correspondence on offer re ALR; internal disc	cussions re.same; review	1.30	
	counter offer			
12/04/2024	attend to sale matters re. counter offer		0.80	
	\$850.00	per hour x total hrs	3.40	\$2,890.00

### **Brandi Swift**

12/03/2024	Payment processing			0.50	
		\$375.00	per hour x total hrs	0.50	\$187.50

Total Professional Services	CAD	\$3,077.50

**CAD** 



### Invoice Remittance

1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street **Suite 1450** 

Vancouver, BC V7Y 1B6

Canada

February 10, 2025 102900002090 Invoice No. 500001.1768 Job No. **Due Upon Receipt** Terms Currency

**Tax Registration:** 

Re: Receivership

Current Invoice Period: Charges posted through January 31, 2025

**Amount Due Current Invoice** 

\$8,804.25

**Bank Information** 

Please indicate our invoice number with your remittance

**Account Name:** FTI Consulting Canada Inc.

Bank Name: **Bank of Nova Scotia** 

**Bank Address:** Scotia Plaza, 44 King Street West

Toronto, Ontario M5H 1H1

Canada

Bank Code: 002

**Account Number:** 0861715 **Swift/BIC Code: NOSCCATT** 

**Transit Code:** 47696

**Account Currency: CAD** 

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque FTI Consulting Canada Inc.

payments to: C/O T10073

P.O. Box 10073 **Postal Station A** 

Toronto, ON M5W 2B1



1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street Suite 1450 Vancouver, BC V7Y 1B6 Canada Invoice No.
Job No.
Terms
Currency
Tax Registration:

February 10, 2025 102900002090 500001.1768 Due Upon Receipt CAD

Re: Receivership

Current Invoice Period: Charges posted through January 31, 2025

Name	Title	Rate	Hours	Total
Thomas Powell	Senior Managing Director	\$1,070.00	4.50	\$4,815.00
Michael Clark	Managing Director	\$850.00	4.20	\$3,570.00
Total Professional Services			8.70	\$8.385.00

Invoice Total	CAD Amount
	\$8,385.00
GST (5%)	\$419.25
Total Due	\$8,804.25



Invoice No. Job No. February 10, 2025 102900002090 500001.1768

**Total Professional Services Thomas Powell** 

Sales matters; consider offers and realtor advice	CC	1.80	
Realtor discussions; review and considering conditional Realtor discussions; review and considering conditional		1.20 1.50	
 \$1,070.00	per hour x total hrs	4.50	\$4,815.00

#### Michael Clark

01/06/2025	review offer received; draft response to NBC to review		1.30	
01/09/2025	internal discussions re. offer			
01/10/2025	attend to update on Langley property; correspondence with Landquest re. offer			
01/14/2025	Review correspondence re. BNS information request			
01/28/2025	Follow up with BNS re outstanding information; prepare summary; attend to			
	email correspondence re. offers	•		
	\$850.00 p	er hour x total hrs	4.20	\$3,570.00

Total Professional Services	CAD	\$8,385.00

**CAD** 



### Invoice Remittance

March 06, 2025 1326 Mann Farms Inc. Invoice No. 102900002164 500001.1768 c/o FTI Consulting Canada Inc. Job No. 701 West Georgia Street **Due Upon Receipt** Terms **Suite 1450** Currency Vancouver, BC V7Y 1B6 **Tax Registration:** 

Canada

Re: Receivership

Current Invoice Period: Charges posted through February 28, 2025

**Amount Due Current Invoice** 

\$8,130.15

**Bank Information** 

Please indicate our invoice number with your remittance

**Account Name:** FTI Consulting Canada Inc. Bank Code: 002 Bank Name: **Bank of Nova Scotia Account Number:** 0861715 **Bank Address:** Scotia Plaza, 44 King Street West **Swift/BIC Code: NOSCCATT** 

> Toronto, Ontario M5H 1H1 **Transit Code:** 47696 Canada **Account Currency: CAD**

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque FTI Consulting Canada Inc.

payments to: C/O T10073 P.O. Box 10073

**Postal Station A** 

Toronto, ON M5W 2B1



1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street Suite 1450 Vancouver, BC V7Y 1B6 Canada Invoice No.
Job No.
Terms
Currency
Tax Registration:

March 06, 2025 102900002164 500001.1768 Due Upon Receipt CAD

Re: Receivership

Current Invoice Period: Charges posted through February 28, 2025

Name	Title	Rate	Hours	Total
Thomas Powell	Senior Managing Director	\$1,070.00	2.40	\$2,568.00
Michael Clark	Managing Director	\$850.00	6.00	\$5,100.00
Tessa Chiricosta	Consultant	\$375.00	0.20	\$75.00
Total Professional Serv	ices		8.60	\$7,743.00

Invoice Total	CAD Amount
	\$7,743.00
GST (5%)	\$387.15
Total Due	\$8,130.15



March 06, 2025
Invoice No. 102900002164
Job No. 500001.1768

**Total Professional Services Thomas Powell** 

02/04/2025	Catch-up on guarantor matters; conversations with couns	sel; internal	1.00	
	discussions with M. Clark			
02/11/2025	Abbotsford farm offer analysis and discussions with NB	C	0.60	
02/14/2025	Abbotsford farm offer analysis and discussions with NB	C	0.80	
	\$1,070.00	per hour x total hrs	2.40	\$2,568.00

### **Michael Clark**

	\$850.00 per hour x total hrs	6.00	\$5,100,00
02/21/2025	Attend to plant maintenance matters	0.20	
	correspondence with Osler re. contract; review and sign counter offer		
02/19/2025	Review revised contract; attend call with Landquest re. revised contract offer;	2.30	
02/18/2025	Attend call with NBC re. offer received; draft email to realtor re. next steps	0.80	
	NBC re offer		
02/14/2025	Attend to correspondence with realtors; attend to email correspondence with	0.30	
	mechanics of offer		
02/11/2025	Review offer; draft communication to NBC; attend call with realtor re.	1.30	
02/05/2025	Email correspondence with agent for RBC re. F350	0.30	
	information request		
02/04/2025	Attend call with Osler re. next steps; follow up with Scotia bank re.	0.80	

### Tessa Chiricosta

02/21/2025	Setting up wire payment; respective TR forms	s 0.20		
	\$375.00	per hour x total hrs	0.20	\$75.00

Total Professional Services	CAD	\$7,743.00



### Invoice Remittance

May 12, 2025 102900002349 1326 Mann Farms Inc. Invoice No. 500001.1768 c/o FTI Consulting Canada Inc. Job No. 701 West Georgia Street **Due Upon Receipt Terms Suite 1450 Due Date:** May 12, 2025 Vancouver, BC V7Y 1B6 Currency **CAD** Canada Tax Registration:

Re: Receivership

Current Invoice Period: Charges posted through April 30, 2025

**Amount Due Current Invoice** 

\$16,465.05

**Bank Information** 

Please indicate our invoice number with your remittance

Account Name: FTI Consulting Canada Inc. Bank Code: 002
Bank Name: Bank of Nova Scotia Account Number: 0861715
Bank Address: Scotia Plaza, 44 King Street West Swift/BIC Code: NOSCCATT

Toronto, Ontario M5H 1H1 Transit Code: 47696
Canada Account Currency: CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque FTI Consulting Canada Inc.

payments to: C/O T10073
P.O. Box 10073

P.O. Box 10073 Postal Station A

Toronto, ON M5W 2B1

**CAD** 



# **Invoice Summary**

1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street **Suite 1450** Vancouver, BC V7Y 1B6 Canada

May 12, 2025 102900002349 Invoice No. Job No. 500001.1768 **Terms Due Upon Receipt Due Date:** May 12, 2025 Currency

Tax Registration:

Re: Receivership

Current Invoice Period: Charges posted through April 30, 2025

Name	Title	Rate	Hours	Total
Thomas Powell	Senior Managing Director	\$1,070.00	5.30	\$5,671.00
Michael Clark	Managing Director	\$850.00	11.60	\$9,860.00
Tessa Chiricosta	Consultant	\$375.00	0.40	\$150.00
Total Professional Serv	rices		17.30	\$15,681.00

Invoice Total	CAD Amount
	\$15,681.00
GST (5%)	\$784.05
Total Due	\$16,465.05



May 12, 2025 102900002349 Invoice No. Job No. 500001.1768

**Total Professional Services Thomas Powell** 

03/06/2025	Offer analysis; foreclosure matter		1.00	
03/07/2025	Offer analysis; foreclosure matter		0.80	
04/23/2025	Review update deck; cash flow projections; consider re	ealtor advice; consider	2.00	
	approach to net cash proceeds from Langley property			
04/24/2025	Review update deck; cash flow projections; consider re-	ealtor advice; consider	1.50	
	approach to net cash proceeds from Langley property			
· _	\$1,070.00	per hour x total hrs	5.30	\$5,671.00

### **Michael Clark**

	\$850.00 per hour x tota	al hrs 11.60	\$9,860.00
04/22/2025	attend to insurance matters	0.30	
	preservation matters re. BC Hydro		
04/17/2025	Review data provided by Landquest; draft update to NBC; deal with proper	erty 3.80	
04/16/2025	Call with B. French re. maintenance	0.30	
	efforts		
04/15/2025	Attend to NBC update re. statement of receipts and disbursements/market	ing 3.30	
	discussions re. same		
04/14/2025	Review correspondence from Landquest re. Abbotsford Property; internal	0.50	
04/10/2025	Attend to insurance matters	0.80	
04/08/2025	Attend insurance matters re. renewal	0.30	
04/01/2025	Attend to insurance matters	0.20	
03/12/2025	Review correspondence from Realtor re. offer on 8201 Dyke Rd.	0.50	
	Rd. property		
03/11/2025	Attend calls/email correspondence with realtor re. counter offer on 8201 [	Oyke 0.80	
03/10/2025	Review revised offer on 8201 Dyke Rd.	0.80	

#### Tessa Chiricosta

		\$375.00	per hour x total hrs	0.40	\$150.00
03/26/2025	Month end TR forms			0.40	

FTI Consulting Canada, Inc. TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104



Invoice No. Job No. May 12, 2025 102900002349 500001.1768

Total Professional Services CAD \$15,681.00



### Invoice Remittance

June 10, 2025 102900002445 1326 Mann Farms Inc. Invoice No. 500001.1768 c/o FTI Consulting Canada Inc. Job No. 701 West Georgia Street **Due Upon Receipt Terms Suite 1450 Due Date:** June 10, 2025 Vancouver, BC V7Y 1B6 Currency **CAD** Canada Tax Registration:

Re: Receivership

Current Invoice Period: Charges posted through May 31, 2025

Amount Due Current Invoice \$7,449.75

**Bank Information** 

Please indicate our invoice number with your remittance

Account Name: FTI Consulting Canada Inc. Bank Code: 002
Bank Name: Bank of Nova Scotia Account Number: 0861715
Bank Address: Scotia Plaza, 44 King Street West Swift/BIC Code: NOSCCATT

Toronto, Ontario M5H 1H1 Transit Code: 47696
Canada Account Currency: CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque FTI Consulting Canada Inc.

payments to: C/O T10073 P.O. Box 10073

P.O. Box 10073
Postal Station A

Toronto, ON M5W 2B1



1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street Suite 1450 Vancouver, BC V7Y 1B6 Canada Invoice No.
Job No.
Terms
Due Date:
Currency
Tax Registration:

June 10, 2025 102900002445 500001.1768 Due Upon Receipt June 10, 2025 CAD

Re: Receivership

Current Invoice Period: Charges posted through May 31, 2025

Name	Title	Rate	Hours	Total
Thomas Powell	Senior Managing Director	\$1,070.00	2.50	\$2,675.00
Michael Clark	Managing Director	\$850.00	5.20	\$4,420.00
Total Professional Ser	vices		7.70	\$7,095.00

Invoice Total	CAD Amount
	\$7,095.00
GST (5%)	\$354.75
Total Due	\$7,449.75



Invoice No. Job No. June 10, 2025 102900002445 500001.1768

**Total Professional Services Thomas Powell** 

05/09/2025	Review presentation and attend meeting with NBC re update deck;	2.50
	consideration of pricing revisions	

\$1,070.00 per hour x total hrs 2.50 \$2,675.00

#### **Michael Clark**

	\$850.00 per hour x total brs	5.20	\$4,420,00
	consultant		
05/30/2025	Review offer received; email correspondence with realtor and agricultural	1.30	
05/20/2025	Review offer received on Abbotsford Property	0.50	
05/12/2025	review and sign revisions to listing agreement	0.50	
05/07/2025	Prepare for meeting with NBC; attend to creditor matters	1.30	
	correspondence with realtor		
05/05/2025	Email correspondence with agricultural correspondence re. BC Hydro; email	0.30	
	agreement and email correspondence re feedback		
05/02/2025	Attend to NBC update; follow up with agricultural consultant; review listing	1.30	

Total Professional Services	CAD	\$7,095.00



### Invoice Remittance

July 14, 2025 102900002547 1326 Mann Farms Inc. Invoice No. 500001.1768 c/o FTI Consulting Canada Inc. Job No. 701 West Georgia Street **Due Upon Receipt Terms Suite 1450 Due Date:** July 14, 2025 Vancouver, BC V7Y 1B6 Currency **CAD** Canada Tax Registration:

Re: Receivership

Current Invoice Period: Charges posted through June 30, 2025

Amount Due Current Invoice \$45,868.20

**Bank Information** 

Please indicate our invoice number with your remittance

Account Name:FTI Consulting Canada Inc.Bank Code:002Bank Name:Bank of Nova ScotiaAccount Number:0861715Bank Address:Scotia Plaza, 44 King Street WestSwift/BIC Code:NOSCCATT

Toronto, Ontario M5H 1H1 Transit Code: 47696
Canada Account Currency: CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque FTI Consulting Canada Inc.

payments to: C/O T10073 P.O. Box 10073

P.O. Box 100/3
Postal Station A

Toronto, ON M5W 2B1



1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street Suite 1450 Vancouver, BC V7Y 1B6 Canada July 14, 2025
Invoice No. 102900002547
Job No. 500001.1768
Terms Due Upon Receipt
Due Date: July 14, 2025
Currency CAD
Tax Registration:

Re: Receivership

Current Invoice Period: Charges posted through June 30, 2025

Name	Title	Rate	Hours	Total
Thomas Powell	Senior Managing Director	\$1,070.00	7.70	\$8,239.00
Craig Munro	Managing Director	\$850.00	0.50	\$425.00
Michael Clark	Managing Director	\$850.00	41.20	\$35,020.00
Total Professional Ser	vices		49.40	\$43,684.00

Invoice Total	CAD Amount
	\$43,684.00
GST (5%)	\$2,184.20
Total Due	\$45,868.20



July 14, 2025 Invoice No. 102900002547 Job No. 500001.1768

Total Professional Services

**Thomas Powell** 

06/04/2025			2.20	
	representatives re potential to call for final offers; review	w related		
	correspondence			
06/13/2025	Review and consideration of offers received		1.80	
06/18/2025	Review and discussion re offers; discussions with NBC	; operations matters	1.00	
06/19/2025	Review and discussion re offers; discussions with NBC	; operations matters	2.20	
06/20/2025	Review and discussion re offers; discussions with NBC	; operations matters	0.50	
	\$1,070.00	per hour x total hrs	7.70	\$8,239.00

### Craig Munro

	\$850.00	per hour x total hrs	0.50	\$425.00
06/10/2025	Attend mtg with B Bhullar and T Powell.	0.50		

### **Michael Clark**

06/02/2025	Calls with Landquest; review offer received and draft email to NBC re. summary of offer	2.30
06/03/2025	Review offer; attend call with Landquest re offer; internal discussions re. next steps; draft email to NBC re. call for offers; correspondence with NBC re. call for offers	2.30
06/04/2025	draft email to interested parties re. call for offers; internal discussions re. same; calls with Landquest re. same	1.80
06/05/2025	Attend calls with Landquest; attend call with interested party	1.30
06/06/2025	Attend call with interested party	0.30
06/09/2025	Attend to email correspondence with interested party; review offer received;	0.80
	call with Landquest re. same	
06/10/2025	Attend call with agricultural consultant re. next steps	0.30
06/13/2025	Review offers received; attend call with Landquest	1.80
06/16/2025	Prepare summary of offers received; draft email to NBC	5.80

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104

Toronto, ON M5K1G8 Canada

5.80

5.30

41.20

\$35,020.00

per hour x total hrs



06/27/2025

06/30/2025 Attend to Receiver's First Report

#### July 14, 2025 Invoice Detail Invoice No. 102900002547 Job No. 500001.1768 06/17/2025 Review related parties re. offers; internal discussions re. same; 4.30 correspondence with Landquest re. next steps; review correspondence re. bill of costs; preparations for and attendance on call with NBC re offers; review counter-offer for 142 offer and sign 06/18/2025 Review correspondence on counter-offer; internal discussions re. same 0.50 06/19/2025 Internal discussions re. offers; draft email to NBC 0.30 06/20/2025 Review email correspondence from NBC re. offers; review Coast Cranberries 0.80 counter offer and sign 06/21/2025 Attend to security matters re. trespassing 1.30 06/23/2025 Calls with B. French re. security matters; correspondence re. accepted offer; 2.30 correspondence with NBC re. accepted offer/security matters; correspondence with Osler re. application for proceeds 0.80 06/24/2025 Review affidavit and court application re. release of funds 06/25/2025 Correspondence with B. French re. security matters 0.30 06/26/2025 review of finalized affidavit; attend to First Report 2.80

Total Professional Services	CAD	\$43,684.00

Attend Osler office to sign affidavit; attend to draft report

\$850.00



### Invoice Remittance

August 11, 2025 1326 Mann Farms Inc. Invoice No. 102900002634 500001.1768 c/o FTI Consulting Canada Inc. Job No. 701 West Georgia Street **Due Upon Receipt Terms Suite 1450 Due Date:** August 11, 2025 Vancouver, BC V7Y 1B6 Currency **CAD** Canada Tax Registration:

Re: Receivership

Current Invoice Period: Charges posted through July 31, 2025

Amount Due Current Invoice \$37,622.55

**Bank Information** 

Please indicate our invoice number with your remittance

Account Name:FTI Consulting Canada Inc.Bank Code:002Bank Name:Bank of Nova ScotiaAccount Number:0861715Bank Address:Scotia Plaza, 44 King Street WestSwift/BIC Code:NOSCCATT

Toronto, Ontario M5H 1H1 Transit Code: 47696 Canada Account Currency: CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque FTI Consulting Canada Inc.

payments to: C/O T10073 P.O. Box 10073

P.O. Box 10073 Postal Station A

Toronto, ON M5W 2B1



1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street Suite 1450 Vancouver, BC V7Y 1B6 Canada Invoice No.
Job No.
Terms Due Date:
Currency
Tax Registration:

August 11, 2025 102900002634 500001.1768 Due Upon Receipt August 11, 2025 CAD

Re: Receivership

Current Invoice Period: Charges posted through July 31, 2025

Name	Title	Rate	Hours	Total
Thomas Powell	Senior Managing Director	\$1,070.00	11.80	\$12,626.00
Michael Clark	Managing Director	\$850.00	27.30	\$23,205.00
Total Professional Ser	vices		39.10	\$35,831.00

Invoice Total	CAD Amount
	\$35,831.00
GST (5%)	\$1,791.55
Total Due	\$37,622.55

2



August 11, 2025 Invoice No. 102900002634 Job No. 500001.1768

Total Professional Services
Thomas Powell

07/01/2025	Review and edit First Report		2.80	
07/17/2025	Illegal dumping matters; discussion around FCC cred for Court hearing on July 21; discussions with couns NBC		1.20	
07/18/2025	Illegal dumping matters; discussion around FCC cred for Court hearing on July 21; discussions with couns NBC		1.60	
07/20/2025	Illegal dumping matters; discussion around FCC cred for Court hearing on July 21; discussions with couns NBC		0.50	
07/21/2025	Corresponding with purchaser and legal counsel regardarm; environmental matters; security matters	arding sale of Abbotsford	2.50	
07/22/2025	Corresponding with purchaser and legal counsel regardarm; environmental matters; security matters	arding sale of Abbotsford	1.40	
07/30/2025	Closing matters		1.00	
07/31/2025	Closing matters		0.80	
	\$1,070.00	per hour x total hrs	11.80	\$12,626.00

#### **Michael Clark**

07/07/2025	Attend call with agricultural consultant; review costs to remove soil;	1.30
	correspondence with Osler re. report	
07/08/2025	Review comments from Osler; review notice of application re. sale approval	1.80
07/09/2025	Attend to sale approval matters	0.80
07/11/2025	Attend to email correspondence with Landquest and Osler re. sale approval	0.50
07/15/2025	Follow up on property matters re. sale approval	0.80
07/17/2025	Review application response from FCC: internal discussions re. same; attend	2.30
	calls with Osler/Blakes	
07/18/2025	Call with M. Sennott re. client interested in property; Call with Blakes re. sale	5.30
	application; call with B. French re. soil samples; call with environmental	
	specialist re. soil samples; Call with Osler re. sale approval application;	
	internal discussions re. same.	
07/21/2025	Prepare for and attend Court hearing; review offers received; discussions with	5.80
	Osler re, same; attend call with Purchaser re, harvesting	

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

\$23,205.00

27.30

per hour x total hrs



Invoice Detail	Invoice No.  Job No.	August 11, 2025 102900002634 500001.1768
07/22/2025	Consider requests from purchaser re. blueberry harvest; discussions with Osler re. same; call from B. French re. trespass; attend call with NBC re. update	4.80
07/23/2025	Attend to email communications re. closing; attend call with Coast/Kerfoot re. harvesting/security; call with B. French re. security	2.30
07/25/2025	Attend to security matters	0.30
07/29/2025	Attend call with Ron Martini re. Coast Cranberries; attend call with B. French; attend to closing matters	1.30

\$850.00



### Invoice Remittance

**September 11, 2025** 1326 Mann Farms Inc. Invoice No. 102900002758 500001.1768 c/o FTI Consulting Canada Inc. Job No. 701 West Georgia Street **Due Upon Receipt Terms Suite 1450 September 11, 2025 Due Date:** Vancouver, BC V7Y 1B6 Currency **CAD** 

Canada Tax Registration:

Re: Receivership

Current Invoice Period: Charges posted through August 31, 2025

Amount Due Current Invoice \$13,403.25

**Bank Information** 

Please indicate our invoice number with your remittance

Account Name:FTI Consulting Canada Inc.Bank Code:002Bank Name:Bank of Nova ScotiaAccount Number:0861715Bank Address:Scotia Plaza, 44 King Street WestSwift/BIC Code:NOSCCATT

Toronto, Ontario M5H 1H1 Transit Code: 47696 Canada Account Currency: CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque FTI Consulting Canada Inc.

payments to: C/O T10073

P.O. Box 10073 Postal Station A

Toronto, ON M5W 2B1



1326 Mann Farms Inc. c/o FTI Consulting Canada Inc. 701 West Georgia Street Suite 1450 Vancouver, BC V7Y 1B6 Canada Invoice No.
Job No.
Terms Du
Due Date: Sept
Currency

September 11, 2025 102900002758 500001.1768 Due Upon Receipt September 11, 2025 CAD

**Tax Registration:** 

Re: Receivership

Current Invoice Period: Charges posted through August 31, 2025

Name	Title	Rate	Hours	Total
Thomas Powell	Senior Managing Director	\$1,070.00	2.00	\$2,140.00
Michael Clark	Managing Director	\$850.00	12.50	\$10,625.00
Total Professional Ser	vices		14.50	\$12,765.00

Invoice Total	CAD Amount
	\$12,765.00
GST (5%)	\$638.25
Total Due	\$13,403.25



Invoice No. Job No. September 11, 2025 102900002758 500001.1768

**Total Professional Services Thomas Powell** 

08/25/2025	Review and edit update presentation for National Bank		2.00	
	\$1,070.00	per hour x total hrs	2.00	\$2,140.00

#### **Michael Clark**

	\$850.00 per hour x total hrs	12.50	\$10,625.00
08/26/2025	Finalize update to NBC	0.80	
08/25/2025	Attend to comments on NBC update; internal discussions re. same	1.30	
08/21/2025	Draft update to NBC re. distribution	3.80	
08/20/2025	Follow up on status of soil remediation; attend to insurance matters	0.80	
	environmental reporting from J. Richards re. soil removal		
08/19/2025	Review email correspondence from BFL re. insurance coverage; review	0.80	
08/14/2025	Attend to insurance matters	0.30	
08/13/2025	attend to estate wind-down matters; follow up on status of soil remediation	1.80	
	disbursements; internal discussions re. same		
08/12/2025	Attend to estate wind-down matters; Update statement of receipts and	1.30	
08/11/2025	review email correspondence re. soil removal	0.30	
08/07/2025	Coordination of soil removal project	1.30	

Total Professional Services	CAD	\$12,765.00