

August 27, 2024

**IN THE MATTER OF THE BANKRUPTCY OF
13 MANN FARMS B.C. LTD.
OF THE CITY OF VANCOUVER
IN THE PROVINCE OF BRITISH COLUMBIA**

To all known creditors of 13 Mann Farms B.C. Ltd. ("13 Mann")

We write to inform you that on August 26, 2024, 13 Mann filed an assignment in bankruptcy pursuant to section 49(1) of the *Bankruptcy and Insolvency Act* (the "BIA") and FTI Consulting Canada Inc. was appointed as trustee (the "Trustee").

Pursuant to section 102 of the BIA, please find enclosed the following documents:

- Form 68
 - Notice of Bankruptcy, First Meeting of Creditors;
- Form 78
 - Statement of Affairs;
 - Creditors Listing; and
- Forms 31 & 36
 - Proof of Claim
 - Proxy and related instructions.

As set out in the Notice of Bankruptcy as attached, the first meeting of creditors will be held on September 13, 2024, at 10:00 a.m. Pacific Time via telephone conference at, (866) 840-8976, Conference ID # 602 555 973# or video conference at, <https://www.microsoft.com/microsoft-teams/join-a-meeting>, Meeting ID: 219 746 747 00, Passcode: BuPxYK. Only creditors and their authorized representatives are entitled to attend the first meeting of creditors.

To be entitled to vote at the meeting, a creditor must file with the trustee a proof of claim and, where necessary, a proxy before the meeting.

If you wish to file a proof of claim and proxy, please complete the enclosed forms and submit them with the required documentation by email at mannfarms@fticonsulting.com prior to the meeting of creditors.

Yours truly,
FTI Consulting Canada Inc.
In its capacity as 13 Mann Farms B.C. Ltd.
And not in its personal or corporate capacity



Mike Clark
Managing Director

District of: British Columbia
Division No. 03 - Vancouver
Court No. 11-3121211
Estate No. 11-3121211

FORM 68
Notice of Bankruptcy, First Meeting of Creditors
(Subsection 102(1) of the Act)

Original Amended

Take notice that:

1. 13 Mann Farms B.C. Ltd. filed (or was deemed to have filed) an assignment (or a bankruptcy order was made against 13 Mann Farms B.C. Ltd.) on the 26th day of August 2024 and the undersigned, FTI Consulting Canada Inc., was appointed as trustee of the estate of the bankrupt by the official receiver (or the Court); subject to affirmation by the creditors of the trustee's appointment or substitution of another trustee by the creditors.
2. The first meeting of creditors of the bankrupt will be held on the 13th day of September 2024 at 10:00 AM at Via Teams Conference Meeting, <https://www.microsoft.com/en-ca/microsoft-teams/join-a-meeting>; Meeting ID: 219 746 747 00; passcode: BuPxYK or Dial in: +1 604-901-0764 or (866) 840-8976 with Meeting ID: 602555973#.
3. To be entitled to vote at the meeting, a creditor must file with the trustee, before the meeting, a proof of claim and, where necessary, a proxy.
4. Enclosed with this notice are a proof of claim form, proxy form and list of creditors with claims amounting to \$25 or more showing the amounts of their claims.
5. Creditors must prove their claims against the estate of the bankrupt to share in any distribution of the proceeds realized from the estate.

Dated at the city of Vancouver in the Province of British Columbia, this 27th day of August 2024.

FTI Consulting Canada Inc. - Licensed Insolvency Trustee
Per:



Mike Clark - Licensed Insolvency Trustee
1450 – 701 W. Georgia
Vancouver BC V7Y 1B6
Phone: (866) 248-7617

District of: British Columbia
 Division No. 03 - Vancouver
 Court No. TBD
 Estate No. TBD

Original

Amended

-- Form 78 --

Statement of Affairs (Business Bankruptcy) made by an entity
 (Subsection 49(2) and Paragraph 158(d) of the Act / Subsections 50(2) and 62(1) of the Act)

To the bankrupt:

You are required to carefully and accurately complete this form and the applicable attachments showing the state of your affairs on the date of the bankruptcy, on the 26th day of August 2024. When completed, this form and the applicable attachments will constitute the Statement of Affairs and must be verified by oath or solemn declaration.

LIABILITIES (as stated and estimated by the officer)		ASSETS (as stated and estimated by the officer)	
1. Unsecured creditors as per list "A"	0.00	1. Inventory	0.00
Balance of secured claims as per list "B"	18,123,850.79	2. Trade fixtures, etc.	0.00
Total unsecured creditors	18,123,850.79	3. Accounts receivable and other receivables, as per list "E"	
2. Secured creditors as per list "B"	1.00	Good	0.00
3. Preferred creditors as per list "C"	0.00	Doubtful	0.00
4. Contingent, trust claims or other liabilities as per list "D"		Bad	0.00
estimated to be reclaimable for	0.00	Estimated to produce	0.00
Total liabilities	18,123,851.79	4. Bills of exchange, promissory note, etc., as per list "F"	0.00
Surplus	NIL	5. Deposits in financial institutions	0.00
		6. Cash	1.00
		7. Livestock	0.00
		8. Machinery, equipment and plant	0.00
		9. Real property or immovable as per list "G"	0.00
		10. Furniture	0.00
		11. RRSPs, RRFs, life insurance, etc.	0.00
		12. Securities (shares, bonds, debentures, etc.)	0.00
		13. Interests under wills	0.00
		14. Vehicles	0.00
		15. Other property, as per list "H"	0.00
		If bankrupt is a corporation, add:	
		Amount of subscribed capital	0.00
		Amount paid on capital	0.00
		Balance subscribed and unpaid	0.00
		Estimated to produce	0.00
		Total assets	1.00
		Deficiency	18,123,850.79

I, Michael Clark, per FTI Consulting Canada Inc. in its capacity as Court-appointed Receiver, of the city of Vancouver in the Province of British Columbia, do swear (or solemnly declare) that this statement and the attached lists are to the best of my knowledge, a full, true and complete statement of the affairs of the Corporation on the 26th day of August 2024 and fully disclose all property of every description that is in my possession or that may devolve on me in accordance with the Act.

SWORN (or SOLEMNLY DECLARED)

before me at the city of Vancouver in the Province of British Columbia, on this 26th day of August 2024.



ELIE LASKIN
BARRISTER & SOLICITOR
Osler, Hoskin & Harcourt LLP
 Suite 3000, Bentall Four
 1055 Dunsmuir Street
 Vancouver, BC V7X 1K8
 TELEPHONE: 236.466.2816



Michael Clark, per FTI Consulting Canada
 Inc. in its capacity as Court-appointed
 Receiver

District of: British Columbia
 Division No. 03 - Vancouver
 Court No. TBD
 Estate No. TBD

FORM 78 -- Continued

List "A"
 Unsecured Creditors
 13 Mann Farms B.C. Ltd.

No.	Name of creditor	Address	Unsecured claim	Balance of claim	Total claim
1	City of Abbotsford	32315 South Fraser Way Abbotsford BC V2T 1W7	0.00	0.00	0.00
2	Farm Credit Canada	12040 - 149 Street NW Edmonton AB T5V 1P2 CA	0.00	4,362,027.42	4,362,027.42
3	National Bank of Canada	Suite 600, 311-6th Ave. SW Calgary AB T2P 3H2 CA	0.00	13,761,823.37	13,761,823.37
4	Receiver General for Canada	Insolvency Intake Centre - 9755 King George Blvd Surrey BC V3T 5E1 CA	0.00	0.00	0.00
5	Royal Bank of Canada	10 York Mills Road, 3rd Floor Toronto ON M2P 0A2	0.00	0.00	0.00
6	TD Auto Finance (Canada) Inc.	66 Wellington Street West, 15th Floor Toronto ON M5K 1A2	0.00	0.00	0.00
Total:			0.00	18,123,850.79	18,123,850.79

26-Aug-2024

Date



Michael Clark, per FTI Consulting Canada Inc. in its capacity as Court-appointed Receiver

District of: British Columbia
 Division No. 03 - Vancouver
 Court No. TBD
 Estate No. TBD

FORM 78 -- Continued

List "B"
 Secured Creditors

13 Mann Farms B.C. Ltd.

No.	Name of creditor	Address	Amount of claim	Particulars of security	When given	Estimated value of security	Estimated surplus from security	Balance of claim
1	Farm Credit Canada	12040 - 149 Street NW Edmonton AB T5V 1P2 CA	4,362,028.42	Cash on Hand		1.00		4,362,027.42
2	National Bank of Canada	Suite 600, 311-6th Ave. SW Calgary AB T2P 3H2 CA	13,761,823.37	Cash on Hand		0.00		13,761,823.37
Total:			18,123,851.79			1.00	0.00	18,123,850.79

26-Aug-2024

Date



Michael Clark, per FTI Consulting Canada Inc. in its capacity as Court-appointed Receiver

District of: British Columbia
Division No. 03 - Vancouver
Court No. TBD
Estate No. TBD

FORM 78 -- Continued

List "C"
Preferred Creditors for Wages, Rent, etc.

13 Mann Farms B.C. Ltd.

No.	Name of creditor	Address and occupation	Nature of claim	Period during which claim accrued	Amount of claim	Amount payable in full	Difference ranking for dividend	
					Total:	0.00	0.00	0.00

26-Aug-2024

Date


Michael Clark, per FTI Consulting Canada Inc. in its capacity as Court-appointed Receiver

District of: British Columbia
Division No. 03 - Vancouver
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Estate No. TBD

FORM 78 -- Continued

List "D"
Contingent or Other Liabilities

13 Mann Farms B.C. Ltd.

No.	Name of creditor or claimant	Address and occupation	Amount of liability or claim	Amount expected to rank for dividend	Date when liability incurred	Nature of liability
Total:			0.00	0.00		

26-Aug-2024

Date



Michael Clark, per FTI Consulting Canada Inc. in its capacity as Court-appointed Receiver

District of: British Columbia
 Division No. 03 - Vancouver
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 Estate No. TBD

FORM 78 -- Continued

List "E"
 Debts Due to the Bankrupt
 13 Mann Farms B.C. Ltd.

No.	Name of debtor	Address and occupation	Nature of debt	Amount of debt (good, doubtful, bad)	Folio of ledgers or other book where particulars to be found	When contracted	Estimated to produce	Particulars of any securities held for debt
			Total:	0.00 0.00 0.00			0.00	

26-Aug-2024

Date



Michael Clark, per FTI Consulting Canada Inc. in its capacity as Court-appointed Receiver

District of: British Columbia
Division No. 03 - Vancouver
Court No. TBD
Estate No. TBD

FORM 78 – Continued

List "F"

Bills of Exchange, Promissory Notes, Lien Notes, Chattel
Mortgages, etc., Available as Assets

13 Mann Farms B.C. Ltd.

No.	Name of all promissory, acceptors, endorsers, mortgagors, and guarantors	Address	Occupation	Amount of bill or note, etc.	Date when due	Estimated to produce	Particulars of any property held as security for payment of bill or note, etc.
Total:				0.00		0.00	

26-Aug-2024

Date



Michael Clark, per FTI Consulting Canada Inc. in its capacity as Court-appointed Receiver

District of: British Columbia
Division No. 03 - Vancouver
Court No. TBD
Estate No. TBD

FORM 78 -- Continued

List "G"
Real Property or Immovables Owned by Bankrupt

13 Mann Farms B.C. Ltd.

Description of property	Nature of bankrupt interest	In whose name does title stand	Total value	Particulars of mortgages, hypothecs, or other encumbrances (name, address, amount)	Equity or surplus
Total:			0.00		0.00

26-Aug-2024

Date


Michael Clark, per FTI Consulting Canada Inc. in its capacity as Court-appointed Receiver

District of: British Columbia
 Division No. 03 - Vancouver
 Court No. TBD
 Estate No. TBD

FORM 78 -- Concluded

List "H"
 Property

13 Mann Farms B.C. Ltd.
 FULL STATEMENT OF PROPERTY

Nature of property	Location	Details of property	Original cost	Estimated to produce
(a) Stock-in-trade			0.00	0.00
(b) Trade fixtures, etc.			0.00	0.00
(c) Cash in financial institutions			0.00	0.00
(d) Cash on hand		Cash on hand	1.00	1.00
(e) Livestock			0.00	0.00
(f) Machinery, equipment and plant			0.00	0.00
(g) Furniture			0.00	0.00
(h) Life insurance policies, RRSPs, etc.			0.00	0.00
(i) Securities			0.00	0.00
(j) Interests under wills, etc.			0.00	0.00
(k) Vehicles			0.00	0.00
(l) Taxes			0.00	0.00
(m) Other			0.00	0.00
			Total:	1.00

26-Aug-2024

Date



Michael Clark, per FTI Consulting Canada Inc. in its capacity as Court-appointed Receiver

Court No. TBD

File No. TBD

Form 78 (Bill C-12)
Statement of affairs (Business bankruptcy)

FTI Consulting Canada Inc. - Licensed Insolvency
Trustee

1450 – 701 W. Georgia
Vancouver BC V7Y 1B6
Phone: (604) 757-6108

District of: British Columbia
Division No. 03 - Vancouver
Court No. 11-3121211
Estate No. 11-3121211

FORM 31
Proof of Claim
(Sections 50.1, 81.5, 81.6, Subsections 65.2(4), 81.2(1), 81.3(8), 81.4(8), 102(2), 124(2), 128(1),
and Paragraphs 51(1)(e) and 66.14(b) of the Act)

All notices or correspondence regarding this claim must be forwarded to the following address:

In the matter of the bankruptcy of 13 Mann Farms B.C. Ltd. of the city of Surrey in the Province of British Columbia and the claim of _____, creditor.
I, _____ (name of creditor or representative of the creditor), of the city of _____ in the province of _____, do hereby certify:

1. That I am a creditor of the above named debtor (or I am _____ (position/title) of _____, creditor).

2. That I have knowledge of all the circumstances connected with the claim referred to below.

3. That the debtor was, at the date of bankruptcy, namely the 26th day of August 2024, and still is, indebted to the creditor in the sum of \$ _____, as specified in the statement of account (or affidavit) attached and marked Schedule "A", after deducting any counterclaims to which the debtor is entitled. (The attached statement of account or affidavit must specify the vouchers or other evidence in support of the claim.)

4. (Check and complete appropriate category.)

A. UNSECURED CLAIM OF \$ _____

(other than as a customer contemplated by Section 262 of the Act)

That in respect of this debt, I do not hold any assets of the debtor as security and

(Check appropriate description.)

Regarding the amount of \$ _____, I claim a right to a priority under section 136 of the Act.

Regarding the amount of \$ _____, I do not claim a right to a priority.

(Set out on an attached sheet details to support priority claim.)

B. CLAIM OF LESSOR FOR DISCLAIMER OF A LEASE \$ _____

That I hereby make a claim under subsection 65.2(4) of the Act, particulars of which are as follows:

(Give full particulars of the claim, including the calculations upon which the claim is based.)

C. SECURED CLAIM OF \$ _____

That in respect of this debt, I hold assets of the debtor valued at \$ _____ as security, particulars of which are as follows:

(Give full particulars of the security, including the date on which the security was given and the value at which you assess the security, and attach a copy of the security documents.)

D. CLAIM BY FARMER, FISHERMAN OR AQUACULTURIST OF \$ _____

That I hereby make a claim under subsection 81.2(1) of the Act for the unpaid amount of \$ _____

(Attach a copy of sales agreement and delivery receipts.)

District of British Columbia
Division No. 03 - Vancouver
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Estate No. 11-3121211

FORM 31 --- Concluded

- E. CLAIM BY WAGE EARNER OF \$ _____
- That I hereby make a claim under subsection 81.3(8) of the Act in the amount of \$ _____,
- That I hereby make a claim under subsection 81.4(8) of the Act in the amount of \$ _____,
- F. CLAIM BY EMPLOYEE FOR UNPAID AMOUNT REGARDING PENSION PLAN OF \$ _____
- That I hereby make a claim under subsection 81.5 of the Act in the amount of \$ _____,
- That I hereby make a claim under subsection 81.6 of the Act in the amount of \$ _____,
- G. CLAIM AGAINST DIRECTOR \$ _____

(To be completed when a proposal provides for the compromise of claims against directors.)

That I hereby make a claim under subsection 50(13) of the Act, particulars of which are as follows:
(Give full particulars of the claim, including the calculations upon which the claim is based.)

- H. CLAIM OF A CUSTOMER OF A BANKRUPT SECURITIES FIRM \$ _____

That I hereby make a claim as a customer for net equity as contemplated by section 262 of the Act, particulars of which are as follows:

5. That, to the best of my knowledge, I _____ (am/am not) (or the above-named creditor _____ (is/is not)) related to the debtor within the meaning of section 4 of the Act, and _____ (have/has/have not/has not) dealt with the debtor in a non-arm's-length manner.

6. That the following are the payments that I have received from, and the credits that I have allowed to, and the transfers at undervalue within the meaning of subsection 2(1) of the Act that I have been privy to or a party to with the debtor within the three months (or, if the creditor and the debtor are related within the meaning of section 4 of the Act or were not dealing with each other at arm's length, within the 12 months) immediately before the date of the initial bankruptcy event within the meaning of Section 2 of the Act: (Provide details of payments, credits and transfers at undervalue.)

7. (Applicable only in the case of the bankruptcy of an individual.)

- Whenever the trustee reviews the financial situation of a bankrupt to redetermine whether or not the bankrupt is required to make payments under section 68 of the Act, I request to be informed, pursuant to paragraph 68(4) of the Act, of the new fixed amount or of the fact that there is no longer surplus income.

- I request that a copy of the report filed by the trustee regarding the bankrupt's application for discharge pursuant to subsection 170(1) of the Act be sent to the above address.

Dated at _____, this _____ day of _____,

Witness

Creditor

Phone Number: _____
Fax Number : _____
E-mail Address : _____

NOTE: If an affidavit is attached, it must have been made before a person qualified to take affidavits.

WARNINGS: A trustee may, pursuant to subsection 128(3) of the Act, redeem a security on payment to the secured creditor of the debt or the value of the security as assessed, in a proof of security, by the secured creditor.

Subsection 201(1) of the Act provides severe penalties for making any false claim, proof, declaration or statement of account.

District of: British Columbia
Division No. 03 - Vancouver
Court No. 11-3121211
Estate No. 11-3121211

FORM 36
Proxy
(Subsection 102(2) and paragraphs 51(1)(e) and 66.15(3)(b) of the Act)

I, _____, of _____, a creditor in the above matter, hereby appoint _____, of _____, to be my proxyholder in the above matter, except as to the receipt of dividends, _____ (with or without) power to appoint another proxyholder in his or her place.

Dated at _____, this _____ day of _____, _____.

Witness

Individual Creditor

Witness

Name of Corporate Creditor

Per _____
Name and Title of Signing Officer

Return To:
FTI Consulting Canada Inc. - Licensed Insolvency Trustee

1450 – 701 W. Georgia
Vancouver BC V7Y 1B6

E-mail: mannfarms@fticonsulting.com

CHECKLIST FOR PROOF OF CLAIM

This checklist is provided to assist you in preparing the proof of claim form and, if appropriate, the proxy form in a complete and accurate manner. Please check each requirement.

GENERAL

- The signature of a witness is required.
- The document must be signed by the individual completing the declaration.
- Provide the complete address where all notices or correspondence are to be forwarded along with your phone number, fax number and email address where appropriate.

Notes:

- It is permissible to file a proof of claim by fax or by other electronic means.
- A creditor may vote either in person or by proxy at any meeting of creditors if the proof of claim is filed with the trustee prior to the time appointed for the meeting.
- Quorum is established at a meeting of creditors by at least one creditor with a valid proof of claim being in attendance in person, or by any other mode of communication, subject to: the practicability and technological capability of the participants, creditors' preference to attend in person, and the chair's ability to validate the identity of participating creditors, or by proxy.
- A corporation may vote by an authorized agent or mandatary at meetings of creditors.
- In order for a duly authorized person to have a right to vote, they must be a creditor or be the holder of a properly executed proxy. The name of the creditor must appear in the proxy.
- A creditor who is participating in any distribution from an estate must have filed a proof of claim prior to the distribution being declared.
- In the case of an individual bankrupt, by checking the appropriate box or boxes at the bottom of the proof of claim form, you may request that the trustee advise you of any material change in the financial situation of the bankrupt or the amount the bankrupt is required to pay into the bankruptcy, and a copy of the trustee's report on the discharge of the bankrupt.

PARAGRAPH 1

- Creditor must state full and complete legal name of the individual, company or firm.
- If the individual completing the proof of claim is a representative of the creditor, the individual's position or title must be identified.

PARAGRAPH 3

- The amount owing must be set out in paragraph 3.
- A detailed statement of account must be attached to the proof of claim and marked "Schedule A" and must show the date, number and amount of all invoices or charges, together with the date, number and amount of all credits or payments. The amount on the statement of account must correspond to the amount indicated on the proof of claim.

PARAGRAPH 4

Notes:

- Paragraph A applies to *ordinary unsecured claims*. In addition to recording the amount of the claim, please indicate whether the claim has a priority pursuant to section 136 of the Act.
- Paragraph B applies to *lessor claims* in a commercial proposal. Please ensure that the claim applies to a commercial proposal and, if so, include the full particulars of the claim.
- Paragraph C applies to *secured claims*. Please indicate the dollar value of the security and attach copies of the security document. In addition, please attach copies of the security registration documents, where appropriate.
- Paragraph D applies to *inventory claims of farmers, fishermen and aquaculturists*. Please note that such claims apply only to inventory supplied from farmers, fishermen and aquaculturists within 15 (fifteen) days of the date of bankruptcy. In addition, please attach copies of any applicable sales agreements and delivery slips.
- Paragraph E applies to *claims by wage earners*. Please note that such claims apply only for unpaid wages owed upon the bankruptcy of an employer or when the employer becomes subject to a receivership.
- Paragraph F applies to *claims by employees for unpaid amounts regarding pension plans*. Please note that such claims apply only to unremitted pension contributions outstanding when the sponsoring employer becomes bankrupt or is subject to a receivership.
- Paragraph G applies to *claims against directors*. Please note that such claims apply only to directors of corporations that have filed a commercial proposal to creditors that includes a compromise of statutory claims against directors.
- Paragraph H applies to *claims of customers of a bankrupt securities firm*. Please ensure that the claim of the customer is for net equity and, if so, include the full particulars of the claim, including the calculations upon which the claim is based.

PARAGRAPH 5

All claimants must indicate whether or not they are related to the debtor, as defined in section 4

of the Act, or dealt with the debtor in a non-arm's-length manner.

PARAGRAPH 6

All claimants must attach a detailed list of all payments or credits received or granted, as follows:

- (a) within the three (3) months preceding the initial bankruptcy event (including the bankruptcy or the proposal);
- (b) within the twelve (12) months preceding the initial bankruptcy event (including the bankruptcy or the proposal) in the case where the claimant and the debtor were not dealing at arm's length.

-PROXYHOLDER-

NOTE

The Act permits a proof of claim to be made by a duly authorized representative of a creditor but, in the absence of a properly executed proxy, does not give such an individual the power to vote at the first meeting of creditors nor to act as the proxyholder of the creditors.

GENERAL

In order for duly authorized persons to have a right to vote, they must themselves be creditors or be the holders of a properly executed proxy. The name of the creditor must appear in the proxy.

Notes:

- A creditor may vote either in person or by proxyholder.
- A proxy may be filed at any time prior to a vote at a meeting of creditors.
- A proxy can be filed with the trustee in person, by mail or by any form of telecommunication.
- A proxy does not have to be under the seal of a corporation unless required by its incorporating documents or its bylaws.
- The individual designated in a proxy cannot be substituted unless the proxy provides for a power of substitution.
- Bankrupts/debtors may not be appointed as proxyholders to vote at any meeting of their creditors. The trustee may be appointed as a proxyholder for any creditor.
- A corporation cannot be designated as a proxyholder.