



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

**APPLICATION RESPONSE**

**Application Response of:** Farm Credit Canada (the "Application Respondent FCC")

THIS IS A RESPONSE TO the Notice of Application of FTI Consulting Canada Inc. in its capacity as court appointed receiver, filed July 8, 2025.

The Application Respondent FCC estimates that the application will take 20 minutes.

**Part 1: ORDERS CONSENTED TO:**

The Application Respondent FCC consents to the granting of the orders set out in the following paragraphs of Part 1 of the Notice of Application on the following terms: **none**

**Part 2: ORDERS OPPOSED:**

The Application Respondent FCC opposes the granting of the orders set out in the following paragraphs of Part 1 of the Notice of Application: **none**

**Part 3: ORDERS ON WHICH NO POSITION IS TAKEN:**

The Application Respondent FCC takes no position on the granting of the orders set out in the following paragraphs of Part 1 of the Notice of Application: **all**

**Part 4: FACTUAL BASIS:**

1. The Application Respondent FCC is a secured creditor which is owed a total of \$267,601.77 as of July 17, 2025 (the "Amount Owing") across three separate loans which are secured over personal property as detailed below:

- (a) Security Agreement dated December 18, 2020 between the Petition Respondent as secured party, the Respondent Gurmeet Singh Mann ("Gurmeet"), Komalpreet Singh Mann ("Komalpreet") and 13 Mann Farms B.C. Ltd. ("13 Mann") registered in the British Columbia Personal Property Registry on December 22, 2020 under base registration number 669853M (the "First Security Agreement");
- (b) Security Agreement dated December 18, 2020 between the Petition Respondent as secured party and the Respondent 13 Mann registered in the British Columbia Personal Property Registry on December 22, 2020 under base registration number 669889M (the "Second Security Agreement");
- (c) Security Agreement dated April 23, 2021 between the Petition Respondent as secured party, and the Respondents Gurmeet, Komalpreet, 13 Mann and K P Drywall Ltd. registered in the British Columbia Personal Property Registry on April 27, 2021 under base registration number 929356M (the "Third Security Agreement");
- (d) Security Agreement dated September 21, 2021 between the Petition Respondent as secured party and the Respondent 13 Mann registered in the British Columbia Personal Property Registry on October 15, 2021 under base registration number 306120N (the "Fourth Security Agreement");
- (e) Security Agreement dated June 6, 2022 between the Petition Respondent as secured party and the Respondent 13 Mann registered in the British Columbia Personal Property Registry on June 13, 2022 under base registration number 793121N (the "Fifth Security Agreement"); and
- (f) Security Agreement dated July 21, 2022 between the Petition Respondent as secured party and the Respondent 13 Mann registered in the British Columbia

Personal Property Registry on August 5, 2022 under base registration number 902994N (the "Sixth Security Agreement").

**Part 5: LEGAL BASIS:**

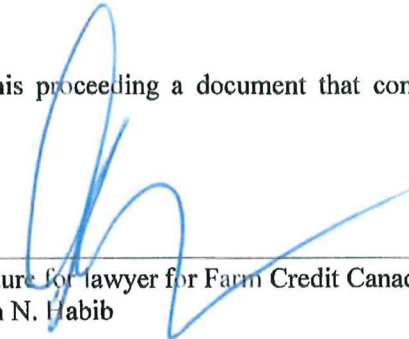
1. The First Security Agreement, the Second Security Agreement, the Third Security Agreement, the Fourth Security Agreement, the Fifth Security Agreement and the Sixth Security Agreement are valid and enforceable.
2. The Application Respondent FCC's Security Interests rank in priority to the interests of the Petitioner pursuant to the provisions of the *Personal Property Security Act*.

**Part 6: MATERIAL TO BE RELIED ON:**

1. Response to Petition filed February 29, 2024;
2. Affidavit #1 of Charmaine Froese Kowalchuk made February 20, 2024, filed February 29, 2024;
3. Affidavit #1 of Louise Volpatti made herein; and
4. Such other materials as counsel may advise.

The Application Respondent FCC has filed in this proceeding a document that contains the Application Respondent FCC's address for service.

Dated: July 17, 2025

  
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Signature for lawyer for Farm Credit Canada,  
Adnan N. Habib

**THIS APPLICATION RESPONSE** was prepared by Adnan N. Habib of the law firm of Baker Newby LLP, whose place of business and address for service is #200 – 2955 Gladwin Road, Abbotsford, British Columbia, V2T 5T4, Tel: (604) 852-3646, Fax: (604) 852-5194.