



This is the 4th Affidavit of Talbir Mann
In this case and was made on September 1, 2026

Province of British Columbia
Bankruptcy Division
Vancouver Registry
Court File No. VLC-S-B-260250
Estate No. 11-3352394

**IN THE SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY AND INSOLVENCY**

**IN THE MATTER OF THE NOTICE OF INTENTION TO
MAKE A PROPOSAL OF
1281805 BC LTD.**

AFFIDAVIT #4 OF TALBIR MANN

I, Talbir Mann, of 4500 – 733 Seymour Street, Vancouver, British Columbia, V6B 0S6, businessperson, AFFIRM THAT:

1. I am the director of 1281805 BC Ltd. (“128” or the “Company”), the developer of a real estate project in Maple Ridge, B.C. known as the Everwood Project, and as such, have personal knowledge of the facts and matters hereinafter deposed to, save and except where such facts and matters are stated to be made upon information and belief, and as to such facts and matters, I verily believe them to be true.
2. I am making this affidavit in support of an application by 128 seeking an order to extend the time for filing a proposal pursuant to subsection 50.4(9) of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3 (the “BIA”) to September 24, 2026. The Company intends to and expects that if this extension is granted, it will file a proposal before September 24.

Progress Since the July 24, 2026 Extension

3. Since obtaining the order extending the time to file a proposal to September 4, 2026, the Company has continued to actively pursue the restructuring of its affairs and advancement of the Everwood Project.

4. The Company has continued to communicate with its secured creditor, trade and supply creditors, marketing agents, municipal authorities, and other stakeholders in connection with the completion of the Everwood Project and the formulation of a restructuring plan.
5. The Company has continued working with FTI Consulting Canada Inc., in its capacity as Proposal Trustee, regarding the Company's restructuring efforts and assessment of available restructuring alternatives.
6. During the current stay period, the Company finalized construction of Phase I of the Everwood Project and obtained occupancy permits for the completed buildings.
7. The Company has continued advancing the closings of the remaining Phase I units that are under contract. In August, it completed 5 units in Phase I. The final closing is currently scheduled to occur on or about September 10, 2026. The completion of the remaining Phase I unit closings is expected to provide the Company with additional clarity regarding available sale proceeds and anticipated creditor recoveries.
8. The Company has continued evaluating the development and commercialization of Phase II of the Everwood Project.
9. In particular, the Company has been reviewing the design and configuration of proposed Phase II units in an effort to improve marketability and responsiveness to current market conditions and purchaser demand.
10. The Company has also been undertaking planning work and preparing for future tendering processes associated with the next phase of development. The work described above is intended to improve the marketability and value of future phases of the Everwood Project and to assist the Company and the Proposal Trustee in assessing restructuring alternatives.
11. Throughout these proceedings, the Company has continued to preserve cash, carefully manage expenditures, and seek to maximize value for the benefit of its stakeholders.

Further Time Required

12. The Company requires a further extension of time in order to complete the remaining Phase I closing process, assess the proceeds realized from those closings, and finalize its assessment of restructuring alternatives.
13. The Company and the Proposal Trustee continue to assess the implications of the completion and sale of Phase I units and the impact of those realizations on a restructuring proposal to creditors.

14. The Company is also continuing to evaluate the most appropriate strategy for advancing Phase II of the Everwood Project, including development, marketing and financing considerations.
15. Residential real estate market conditions remain uncertain and purchaser demand can change significantly over relatively short periods of time. The Company has therefore continued to assess development and restructuring alternatives with a view to maximizing value for creditors and stakeholders.
16. I believe that the additional extension sought will allow the Company to complete the foregoing work and determine the restructuring path that should be pursued.
17. I believe that the Company has acted, and continues to act, in good faith and with due diligence throughout these proceedings and will likely be able to make a viable proposal if the extension sought is granted.
18. I am not aware of any creditor that would be materially prejudiced if the requested extension is granted.

Remote Commissioning

19. I was not physically present before the commissioner of this affidavit, but was present before the commissioner by video technology, and this affidavit was commissioned following the process for remote commissioning of affidavits as set out in Appendix A of the Law Society of British Columbia's Code of Professional Conduct.
20. I acknowledge the solemnity of making this affidavit and the consequences of making an untrue statement herein.

AFFIRMED BEFORE ME in the City of
Vancouver, in the Province of British
Columbia, on this 1st day of September,
2026.



A Commissioner for taking Affidavits
in British Columbia



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