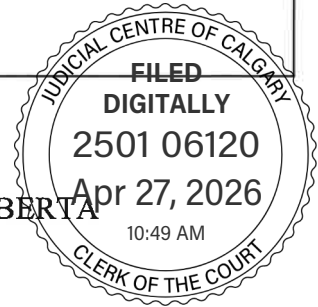


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JUDICIAL CENTRE

CALGARY

APPLICANT

IN THE MATTER OF THE COMPANIES'
CREDITORS ARRANGEMENT ACT, R.S.C. 1985,
c. C-36, as amended

AND IN THE MATTER OF A PLAN OF
COMPROMISE OR ARRANGEMENT OF
SUNTERRA FOOD CORPORATION, TROCHU
MEAT PROCESSORS LTD., SUNTERRA
QUALITY FOOD MARKETS INC., SUNTERRA
FARMS LTD., SUNWOLD FARMS LIMITED,
SUNTERRA BEEF LTD., LARIAGRA FARMS
LTD., SUNTERRA FARM ENTERPRISES LTD.,
SUNTERRA ENTERPRISES INC.

DOCUMENT

AFFIDAVIT

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS
DOCUMENT

BENNETT JONES LLP
Barristers and Solicitors
4500 Bankers Hall East
855 – 2nd Street SW, Calgary, AB

Attention: Lincoln Caylor/Nathan Shaheen/Keely
Cameron/Mathieu LaFleche
Telephone No.: 403-298-3324
Fax No.: 403-265-7219
Client File No.: 099329.1

AFFIDAVIT OF SARA COMPART

Sworn on April 26, 2026

I, **Sara Compert**, of Mankato, Minnesota, USA, AFFIRM AND SAY THAT:

Introduction

1. I am employed by Compeer Financial, PCA (“**Compeer**”) as a Senior Credit Officer. I have personal knowledge of the facts hereinafter deposed to unless otherwise expressly stated to be based on information and belief, in which case I believe them to be true.
2. In his reasons released on January 27, 2026, the Honourable Justice Lema granted judgment in favour of Compeer arising from its tort claim in Alberta (the Canadian Judgement) against:
 - (a) Sunterra Farms Ltd. ("**Sunterra Canada**"), Sunwold Farms Limited ("**Sunwold Canada**"), and Ray Price in the amount of USD \$35,330,968.94 plus interest in accordance with the *Judgment Interest Act*;
 - (b) Sunterra Enterprises Inc. ("**Sunterra Enterprises**") in the amount of USD \$29,132,187.91 plus interest; and
 - (c) reasonable solicitor client costs.
3. In his reasons released on April 21, 2026 , the Honourable Justice Lema directed:

[28] Compeer shall, via affidavit, provide the monitor with the details of its existing and (as best as can be estimated) future recoveries, from all sources (including the US receivership) and its net claim in the *CCA* proceeding (recognizing that it may be subject to further adjustment e.g. if its estimates of future recoveries turn out to be off-target).
4. I provide this affidavit pursuant to this direction.
5. Separately from the Canadian Judgment, Compeer is contractually owed \$40,605,501.69 USD by its three US based Sunterra group customers – Sunwold Farms, Inc., ("**Sunwold US**"), Sunterra Farms Iowa, Inc. ("**Sunterra US**") and Lariagra Farms South, Inc. ("**Lariagra US**") (together, the "**US Sunterra Entities**").
6. The amount of \$40,605,501.69 USD is calculated as follows:

Entity	Principal	Interest	Late Charges
Sunwold US	\$11,151,853.81	\$967,632.20	\$0
Sunterra US	\$22,772,985.03	\$2,344,679.88	\$28,199.32
Lariagra US	\$3,086,731.13	\$253,420.32	\$0
TOTAL	\$37,011,569.97	\$3,565,732.40	\$28,199.32

Recovery to Date

7. After February 28, 2025, Compeer extended further credit to the US Sunterra Entities for the purpose of seeking to protect its security and ultimately to mitigate its loss.¹ It did so in coordination with the US Sunterra Entities, which agreed with the extension of further credit. In addition, Compeer funded the receivership of the US Sunterra Entities, the purpose of which was also to seek to protect its security and ultimately to mitigate its loss.
8. After February 28, 2025, Compeer received certain amounts for the credit of the US Sunterra Entities. For example, Compeer has received payments from the US Sunterra Entities' contractual counterparties and resulting from the sale of certain assets of the US Sunterra Entities by the court-appointed US receiver.
9. As a result, between February 28, 2025 and April 22, 2026 Compeer reduced the amounts owing by the US Sunterra Entities by USD \$2,331,434.01 which has been factored into the amount in paragraph 6.

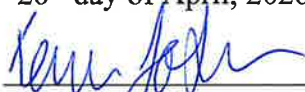
Opportunities for Other Recoveries

10. Compeer understands that the court-appointed receiver of the US Sunterra Entities is holding funds arising from the sale of certain US Sunterra Entities' assets. However, aside from the recoveries discussed above, Compeer has not received any further funds from the receiver (or otherwise).
11. Compeer understands that the court-appointed receiver of the US Sunterra Entities intends to seek its discharge and distribution of funds in the estate soon.

¹ This included amounts for, among other things, rent, animal health, payroll and payroll taxes, employee benefits, utilities, fuel, insurance, repairs and other items required for the US Sunterra Entities' business.

12. It is anticipated that Compeer will receive distribution in the amount of approximately USD \$12.8 million. Such funds will be applied to the amounts owed by the US Sunterra Entities arising from their contractual obligations and as arising in the US receivership first.
13. Compeer also intends to pursue recovery as against Ray Price who as of the date of swearing this affidavit has not provided any financial disclosure, as such Compeer is unable to estimate potential recovery, if any, from Mr. Price.
14. Compeer may also seek to recover some of its losses from other parties such as National Bank of Canada, Arthur Price, Glen Price, David Price and other Sunterra entities that have benefited from the conduct of Sunterra Canada, Sunwold Canada and Mr. Ray Price. At this time, it is unable to estimate what, if any, recovery may result.
15. Accordingly, considering existing and as best can be estimated future recoveries, Compeer's current claim in the CCAA proceeding is \$ 27,805,501.69 USD plus solicitor client costs to be determined by taxation.

SWORN BEFORE ME
at Mankato, Minnesota, this
26th day of April, 2026.



Notary Public

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SARA COMPART

