

March 15, 2024

To: All Known Creditors of 1326 Mann Farm Inc., K P Drywall Ltd., 13 Mann Farms B.C. Ltd. And Dyke Valley Berry Farms Ltd. (collectively, “Mann Farms”)

Mann Farms – In Receivership

Pursuant to an order of the Supreme Court of British Columbia (the “**Receivership Order**”) granted on March 8, 2024, FTI Consulting Canada Inc. was appointed as receiver (the “**Receiver**”) of all the assets, undertakings and properties of Mann Farms other than the following:

- PID: 011-276-584 Lot 2 Except: Part Subdivided by Plan 19940; Section 2 Township 18 New Westminster District Plan 7969; and
- PID: 011-430-524 North Half of the South East Quarter Section 13 Township 10 Except: Firstly: North 33 Feet; Secondly: West 33 Feet; Thirdly: Parcel “A” (Reference Plan 11360); Fourthly: Part Subdivided by Plan 31586, New Westminster District.

A copy of the Receivership Order and other public materials in respect of the receivership proceedings are available at the Receiver’s website:

<http://cfcanada.fticonsulting.com/mannfarms>

Periodic updates on the progress of the receivership will be posted on the Receiver’s website. The Receiver may be contacted by email at mannfarms@FTIConsulting.com or by telephone at 1-866-248-7617.

Enclosed is a copy of the Receiver’s Notice and Statement provided in accordance with Subsection 245(1) and 246(1) of the *Bankruptcy and Insolvency Act*.

Yours truly,

FTI Consulting Canada Inc.,
in its capacity as receiver of Mann Farms
and not in its personal capacity

FORM 87

NOTICE AND STATEMENT OF THE RECEIVER

(Subsection 245(1) and 246(1) of the *Bankruptcy and Insolvency Act*)

IN THE MATTER OF THE RECEIVERSHIP OF

1326 MANN FARM INC., K P DRYWALL LTD., 13 MANN FARMS B.C. LTD. AND DYKE VALLEY BERRY FARMS LTD. (“MANN FARMS” or the “DEBTOR”)

The Receiver gives notice and declares that:

1. On the 8th day of March 2024, FTI Consulting Canada Inc. became the receiver in respect of the property Mann Farms, which is described below.

Real Property	16,500,000
Equipment	Unknown
Crops (planted and unharvested)	<u>Unknown</u>
Total Assets	<u>Unknown</u>

Note: the foregoing is based on a current real estate listing for the 8201 Dyke Road, Abbotsford, B.C., property. The Receiver has not audited, reviewed, or otherwise attempted to verify the accuracy of the foregoing. The Receiver provides no comment on the realizable value of the assets.

2. The Receiver was appointed pursuant to an Order of the Supreme Court of British Columbia granted March 8, 2024 and took possession and control of the assets on the same date.
3. The following information relates to the receivership:

a) Address of the insolvent person: **1326 Mann Farm Inc. and
13 Mann Farms B.C. Ltd.**
12101 84th Avenue
Surrey, BC

Dyke Valley Berry Farms Ltd.
8391 152A Street
Surrey, BC

K P Drywall Ltd.
13371 61A Avenue
Surrey, BC

- b) Principal line of business: Farming
- c) Location of business: Abbotsford, Langley and Mission, BC
- d) Pursuant to the Debtor's records, the total amount owed to each creditor who holds a security on the property described above was approximately:

National Bank of Canada:	\$13.8 million
Farm Credit Canada:	\$6.7 million
Equipment Lessors:	Unknown

- e) A detailed listing of other creditors and the amounts due are listed in the Schedule A attached hereto. The total amount owed to other creditors is unknown at this time.
- f) The intended plan of action of the Receiver during the receivership is to evaluate and execute on the appropriate steps to realize on the assets with a view to maximizing recoveries for all creditors.
- g) Contact for the Receiver:

FTI Consulting Canada Inc.
Suite 1450, 701 W. Georgia St.
Vancouver, BC
V7Y 1B6

Telephone: (866) 248-7617
Email: mannfarms@FTIConsulting.com

Dated at the city of Vancouver in the province of British Columbia, this 15th day of March 2024.

FTI Consulting Canada Inc. – Receiver



Tom Powell
Senior Managing Director

Schedule A**Receivership of 1326 Mann Farm Inc., K P Drywall Ltd., 13 Mann Farms B.C. Ltd. and Dyke Valley Berry Farms Ltd.****Combined Creditor Listing****Amounts in CAD**

Creditor Name	Address	City	Prov.	Postal Code	Country	Unsecured	Secured
National Bank of Canada	Suite 600, 311-6th Ave. SW	Calgary	AB	T2P 3H2	CA	\$ -	\$ 13,761,823.37
Farm Credit Canada	12040 - 149 Street NW	Edmonton	AB	T5V 1P2	CA	-	6,686,376.22
City of Abbotsford	32315 South Fraser Way	Abbotsford	BC	V2T 1W7	CA	-	Unknown
John Deere Financial Inc.	3430 Superior Court	Oakville	ON	L6L 0C4	CA	-	Unknown
Kubota Canada Ltd.	5900 14th Avenue	Markham	ON	L3S 4K4	CA	-	Unknown
Royal Bank of Canada	10 York Mills Road, 3rd Floor	Toronto	ON	M2P 0A2	CA	-	Unknown
TD Auto Finance (Canada) Inc.	66 Wellington Street West, 15th Floor	Toronto	ON	M5K 1A2	CA	-	Unknown
Vault Credit Corporation	41 Scarsdale Road, Unit 5	Toronto	ON	M3B 2R2	CA	-	Unknown
VW Credit Canada Inc.	1340 Pickering Parkway, Suite 500	Pickering	ON	L1V 0C4	CA	-	Unknown
Total						\$ -	Unknown