

NOI INSTRUCTION LETTER**FOR THE CLAIMS PROCESS FOR CREDITORS OF
PUREWAL BLUEBERRY FARMS LTD., 0726357 B.C. LTD., 0726365 B.C. LTD.,
0726368 B.C. LTD., AND PUREWAL FARMS PARTNERSHIP****(hereinafter referred to collectively as the "Petitioners")****Claims Process – For NOI Claimants**

By order of the Supreme Court of British Columbia (the "**Court**") dated **May 8, 2019** (as may be amended, restated or supplemented from time to time, the "**Claims Process Order**"), in the proceeding commenced by, among others, the Petitioners under the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "**CCAA**"), the Monitor has been authorized to conduct a claims process (the "**Claims Process**"). A copy of the Claims Process Order, with all schedules, may be found on the Monitor's Website at: <http://cfcanada.fticonsulting.com/purewal/>. Capitalized terms used in this letter, which are not defined in this letter shall have the meaning ascribed to them in the Claims Process Order.

PLEASE NOTE THAT THIS LETTER AND THE CLAIMS PROCESS ORDER APPLIES ONLY TO THE PETITIONERS. IT DOES NOT APPLY TO CLAIMS AGAINST ANY OTHER ENTITIES.

This letter provides instructions for NOI Claimants for completing the Proof of Claim. A blank Proof of Claim form is included with this letter.

IF YOU HAVE PREVIOUSLY FILED AN NOI CLAIM IN RESPECT OF THE PETITIONERS, AND YOU DO NOT WISH TO AMEND YOUR CLAIM, YOU ARE NOT REQUIRED TO DO ANYTHING FURTHER.

The Claims Process is intended for any Person asserting a Claim (other than an Exempted Claim) of any kind or nature whatsoever against any of the Petitioners and/or any of their Directors and/or Officers arising before the Filing Date, and/or any Restructuring Claim arising on or after the Filing Date as a result of a restructuring, disclaimer, resiliation, termination or breach by any of the Petitioners on or after the Filing Date of any contract, employment agreement, lease or other agreement or arrangement of any nature whatsoever, whether written or oral, and whether such restructuring, disclaimer, resiliation, termination or breach took place or takes place before or after the date of the Claims Process Order.

Pursuant to the terms of the Claims Process Order, in the event that an NOI Claimant files a Claim, such Claim shall replace their NOI Claim and be administered by the Monitor in accordance with the terms of the Claims Process Order. In the event that NOI Claimant does not file a Claim by the Claims Bar Date, that NOI Claimant's previously filed NOI Claim shall be (i) a Claim, and (ii) shall be administered, by the Monitor, in accordance with the terms of the Claims Process Order and the Claims Process.

Current employees of the Petitioners are **not** required to submit a Proof of Claim in respect of any Claim pertaining to wages, including vacation pay and banked time due to them.

If you wish to file a Claim, you must file a Proof of Claim (as referenced in section 2 below) to avoid the barring of any Claim which you may have against any of the Petitioners and/or any of their Directors and/or Officers.

If you have any questions regarding the Claims Process, please contact the Court-appointed Monitor at the address provided below.

All enquiries with respect to the Claims Process should be addressed to:

FTI Consulting Canada Inc.
Suite 1610
520 – 5th Avenue S.W.
Calgary, AB T2P
Attention: Robert Kleebaum

Fax: 1- 403-232-6116
Email: Robert.Kleebaum@fticonsulting.com

1. For Creditors Submitting a Proof of Claim

If you have a Claim, you are required to file a Proof of Claim, in the form enclosed herewith, and ensure **that it is received by the Monitor by 5:00 p.m. (Vancouver time) on June 15, 2019** (the "**Claims Bar Date**"), to avoid the barring of any Claim (other than a Restructuring Claim) you may have against any of the Petitioners and/or any of their Directors and/or Officers, if any.

To avoid the barring of any Restructuring Claim you may have against any of the Petitioners and/or any of their Directors and/or Officers, you are required to file a Proof of Claim, in the form enclosed herewith, and ensure **that it is received by the Monitor by the later of: (a) the Claims Bar Date, and (b) 5:00 p.m. (Vancouver time) on the day which is ten (10) days after the date of the Notice of Disclaimer or Resiliation was sent to you** (the "**Restructuring Claims Bar Date**").

For the avoidance of doubt, any Claim or Restructuring Claim you may have against any of the Petitioners must be filed in accordance with the Process set forth herein.

Additional Proof of Claim forms can be found on the Monitor's website at <http://cfcanada.fticonsulting.com/purewal/> or obtained by contacting the Monitor at the address indicated above and providing particulars as to your name, address, facsimile number and e-mail address. Once the Monitor has this information, you will receive, as soon as practicable, additional Proof of Claim forms.

If you are submitting your Proof of Claim electronically, please submit it in one PDF file and ensure the name of the file is **[legal name of creditor]poc.pdf**.

2. Claims Order

While this NOI Instruction Letter, along with its accompanying Proof of Claim form, is provided to assist you in the Claims Process, you must comply with the terms of the Claims Process Order pronounced **May 8, 2019**.

IF A PROOF OF CLAIM IN RESPECT OF YOUR CLAIM IS NOT RECEIVED BY THE MONITOR BY THE CLAIMS BAR DATE OR RESTRUCTURING CLAIMS BAR DATE, AS APPLICABLE:

- (A) YOUR NOI CLAIM SHALL BE A CLAIM;**
- (B) YOUR NOI CLAIM SHALL BE ADMINISTERED BY THE MONITOR IN ACCORDANCE WITH THE TERMS OF THE CLAIMS PROCESS ORDER AND THE CLAIMS PROCESS;**
- (C) YOUR CLAIM SHALL BE FOREVER BARRED AND YOU WILL BE PROHIBITED FROM MAKING OR ENFORCING A CLAIM AGAINST ANY OF THE PETITIONERS AND/OR ANY OF THEIR DIRECTORS AND/OR OFFICERS;**

- (D) YOU SHALL NOT BE PERMITTED TO VOTE ON ANY PLAN OF ARRANGEMENT OR COMPROMISE OR ENTITLED TO ANY FURTHER NOTICE OR DISTRIBUTION UNDER THE PLAN, IF ANY;
- (E) YOU SHALL NOT BE ENTITLED TO ANY PROCEEDS OF SALE OF ANY OF THE PETITIONERS' ASSETS; AND
YOU SHALL NOT BE ENTITLED TO PARTICIPATE AS A CREDITOR IN THE CCAA PROCEEDINGS OF THE PETITIONERS.

**PROOF OF CLAIM
AGAINST PUREWAL BLUEBERRY FARMS LTD., 0726357 B.C. LTD.,
0726365 B.C. LTD., 0726368 B.C. LTD., AND PUREWAL FARMS PARTNERSHIP**

(hereinafter referred to collectively as the "Petitioners")

Please read the enclosed Instruction Letter carefully prior to completing this Proof of Claim. Defined terms not defined within this Proof of Claim form shall have the meaning ascribed thereto in the Claims Process Order dated May 8, 2019, as may be amended, restated or supplemented from time to time.

1. Particulars of Creditor:

(a) Please complete the following:

Full Legal Name: <i>(Full legal name should be the name of the original Creditor, regardless of whether an assignment of a Claim, or a portion thereof, has occurred prior to or following the Filing Date.)</i>	
Full Mailing Address: <i>(Full Mailing Address should be that of the Creditor, not of the Assignee.)</i>	
Telephone Number:	
Facsimile Number:	
E-mail address:	
Attention (Contact Person):	

(b) I have a claim against *(check all that apply)*:

- Purewal Blueberry Farms Ltd.
- Purewal Farms Partnership
- 0726357 B.C. Ltd.
- 0726365 B.C. Ltd.
- 0726368 B.C. Ltd.

(c) Has the Claim been sold, transferred or assigned by the Creditor to another party (an "Assignee")?

- Yes:
- No:

2. Particulars of Assignee(s) (if any):

- (a) Please complete the following if all or a portion of the Claim has been assigned. Insert full legal name of assignee(s) of the Claim. If there is more than one assignee, please attach a separate sheet with the required information:

Full Legal Name of Assignee(s):	
Full Mailing Address of Assignee(s):	
Telephone Number of Assignee(s):	
Facsimile Number of Assignee(s):	
E-mail address of Assignee(s):	
Attention (Contact Person):	

Proof of Claim:

I _____ (name of individual Creditor or Representative of corporate Creditor), of _____ (City, Province or State) do hereby certify:

- (a) that I am a Creditor; OR

am _____ (state position or title)
 _____ (name of corporate Creditor), which is a Creditor;

that I have knowledge of all the circumstances connected with the Claim referred to below;

- (b) that _____ (name of applicable Petitioners and/or Directors and/or Officers) was and still is indebted to the Creditor as follows:

CLAIM (other than Restructuring Claim):

_____ (insert \$ value of Claim)

RESTRUCTURING CLAIM:

\$ _____ (insert \$ value of Claim arising after the Filing Date resulting from the restructuring, disclaimer, resiliation, termination or breach after the Filing Date of any contract, employment agreement, lease or other agreement or arrangement of any nature whatsoever, whether written or oral);

A. TOTAL CLAIM(S) \$ _____

(Note: Claims in a currency other than Canadian Dollars will be converted to Canadian Dollars at the noon spot rate of the Bank of Canada as at the Filing Date. Please indicate currency of claim if not Canadian Dollars).

Nature of Claim:

(Check and complete appropriate category)

- A. UNSECURED CLAIM OF \$ _____ That in respect of this debt, no assets of any of the Petitioners are pledged as security.
- B. SECURED CLAIM OF \$ _____. That in respect of this debt, assets of _____ *(insert name of applicable Petitioners)* valued at \$ _____ are pledged to me 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.)

Particulars of Claims:

Other than as already set out herein, the particulars of the undersigned's total Claim and/or Restructuring Claim are attached.

(Provide all particulars of the claims and supporting documentation, including amount, description of transaction(s) or agreement(s) giving rise to the claims, name of any guarantor which has guaranteed the claims, and amount of invoices, particulars of all credits, discounts, etc. claimed, description of the security, if any, granted by the Petitioners to the Creditor and estimated value of such security. Where a claim is advanced against any Directors or Officers, please provide either a reference to a statutory authority for your claim or enclose a draft Notice of Civil Claim.)

Filing of Claims:

This Proof of Claim must be received by the Monitor by no later than 5:00 p.m. (Vancouver time) on June 15, 2019, (the "Claims Bar Date") unless your claim is a Restructuring Claim.

Proofs of Claim for Restructuring Claims arising after the Filing Date resulting from a restructuring, disclaimer, rescission, termination, or breach after the Filing Date of any contract, employment agreement, lease or other agreement or arrangement of any nature whatsoever, whether written or oral, **must be received by the Monitor by the later of: (a) the Claims Bar Date, and (b) by 5:00 p.m. (Vancouver time) on the day which is 10 days after the date of the applicable Notice of Disclaimer or Rescission (the "Restructuring Claims Bar Date").**

FAILURE TO FILE YOUR PROOF OF CLAIM AS DIRECTED BY THE CLAIMS BAR DATE OR RESTRUCTURING CLAIMS BAR DATE, AS APPLICABLE, WILL RESULT IN YOUR CLAIM BEING FOREVER BARRED AND YOU WILL BE PROHIBITED FROM MAKING OR ENFORCING A CLAIM AGAINST ANY OF THE PETITIONERS AND/OR ANY OF THEIR DIRECTORS AND/OR OFFICERS.

This Proof of Claim must be delivered by prepaid registered mail, personal delivery, e-mail, or courier at the following addresses:

FTI Consulting Canada Inc.
Suite 1610
520 – 5th Avenue S.W.
Calgary, AB T2P 3R7
Attention: Rob Kleebaum

or email addressed to:

Robert.Kleebaum@fticonsulting.com

DATED this _____ day of _____ 2019.

Witness:

Per: _____

Print name of Creditor:

*If Creditor is other than an individual, print name
and title of authorized signatory*

Name: _____

Title: _____