

Supreme Court of Nova Scotia

Application by Victory Farms Incorporated and Jonathan Mullen Mink Ranch
Limited for relief under the Companies' Creditors Arrangement Act

4th Affidavit of Jonathan Mullen

1. I am Jonathan Mullen, and I am president of both Victory Farms Incorporated ("VFI") and Jonathan Mullen Mink Ranch Limited ("JMMR").
2. I have personal knowledge of the evidence sworn to in this affidavit except where otherwise stated to be based on information and belief.
3. I state, in this affidavit, the source of any information that is not based on my own personal knowledge, and I state my belief of the source.
4. I refer to and incorporate as my evidence in this my Affidavit the statements averred to in my affidavits filed in this matter on August 24, 2016, September 12, 2016, and September 23, 2016.

ACTIVITY SINCE FILING INITIAL ORDER

5. Since the granting of the Initial Order on August 31, 2016, management of the Applicants has been engaged in:
 - a) continuing with the ordinary business of the Applicants including the care and nurturing of the mink currently being grown. We are rapidly approaching the time when the mink will be culled, which will reduce operating expenses;
 - b) arranging for appraisals of all the assets and equipment of the Applicants so as to identify a present value of same. Those appraisals have now been completed;
 - c) completing the arrangement of debtor in possession financing with North American Fur Auctions Inc. ("NAFA"). The DIP financing was arranged, and to date \$775,000 has been advanced (which is less than originally projected). The reason for same is that I was able to negotiate feed purchases at a 20% reduction in cost, and consumption has been below projections;
 - d) continued discussions with counsel, the Monitor and NAFA regarding long term financing of the operations of the Applicants; and

