

Court Administration  
AUG 09 2017  
Halifax, N.S.

Hfx. No. 454744

2016

Supreme Court of Nova Scotia

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

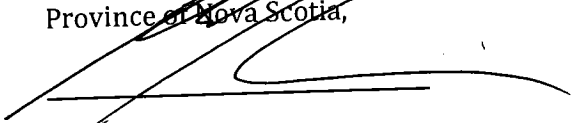
**Affidavit of Tim Hill, Q.C.**

1. I am Tim Hill, Q.C., and I am counsel for 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.

**ACTIVITY SINCE GRANTING OF THE LAST STAY ORDER**

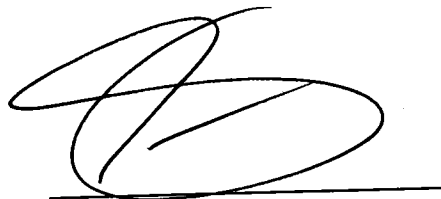
4. Since the granting of the last Stay Extension Order on May 31, 2017, the following steps have occurred:
  - a) the AgriStability payment has been received, and been transferred to the purchaser;
  - b) I am advised by James Foran, Vice-President of the Monitor, and verily believe, that the Monitor has followed, and continues, to follow the steps set out in the Claims Order;
  - c) I am further advised by James Foran, and verily believe, that the process dictated by the Claims Order will not be completed in its entirety prior to the expiry of the present stay of proceedings, which will occur on August 31, 2017; and
  - d) I am further advised by James Foran, and verily believe, that an HST refund is still to be received by the Applicants.

Sworn to before me on the 9<sup>th</sup> day of August  
2017, at Dartmouth,  
Province of Nova Scotia,



A Barrister of the Supreme Court  
of Nova Scotia

**GEOFFREY J. FRANKLIN**  
A Barrister of the Supreme  
Court of Nova Scotia



Tim Hill, Q.C.