



This is the 1st Affidavit of
Susan Danielisz in this case and
was made on September 15, 2026

No. S-248267
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

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

AND

IN THE MATTER OF THE *CANADA BUSINESS CORPORATIONS ACT*, R.S.C. 1985,
c. C-44, THE *BUSINESS CORPORATIONS ACT*, S.B.C. 2002, c. 57

AND

IN THE MATTER OF SAN INDUSTRIES LTD.
AND THOSE PARTIES LISTED ON SCHEDULE "A"

PETITIONERS

A F F I D A V I T

I, **Susan Danielisz**, paralegal, of Suite 2400, 745 Thurlow Street, Vancouver, British Columbia, **SWEAR THAT:**

1. I am a paralegal with the law firm of McCarthy Tétrault LLP, counsel to the Petitioner, National Bank of Canada (formerly Canadian Western Bank) and, as such, have personal knowledge of the matters hereinafter deposed to, save and except where stated to be on information and belief, in which case I verily believe them to be true.
2. Attached hereto and marked as **Exhibit "A"** is a true copy of the Master Lease Agreement dated June 24, 2015 (the "**San Industries MLA**").
3. Attached hereto and marked as **Exhibit "B"** is a true copy of Schedule 420324 to the San Industries MLA.
4. Attached hereto and marked as **Exhibit "C"** is a true copy of the Master Lease Agreement dated December 23, 2020 (the "**San Forest MLA**").
5. Attached hereto and marked as **Exhibit "D"** is a true copy of Schedule 465477 to the San Forest MLA.

6. Attached hereto and marked as **Exhibit “E”** is a true copy of Schedule 467483 to the San Forest MLA.
7. Attached hereto and marked as **Exhibit “F”** is a true copy of the commitment letter dated November 7, 2018 and signed November 16, 2018 (the “**San Industries CL**”), for a loan amount of \$122,271.26 and a credit facility of \$1,500,000, to assist San Industries with the purchase of certain industrial equipment.
8. Attached hereto and marked as **Exhibit “G”** is a true copy of the general security agreement dated November 30, 2018 between San Industries and NBC (“**San Industries GSA**”).
9. Attached hereto and marked as **Exhibit “H”** is a true copy of Schedule 458422 to the San Industries SGA, executed September 14, 2020.
10. Attached hereto and marked as **Exhibit “I”** is a true copy of the commitment letter dated October 22, 2020 and signed October 26, 2020 (the “**San Forest CL**”), for a loan amount of \$2,000,000, to assist San Forest Products with the purchase of certain industrial equipment (the “**San Forest CL**”).
11. Attached hereto and marked as **Exhibit “J”** is a true copy of the general security agreement dated October 26, 2020 between San Forest Products and NBC (the “**San Forest GSA**”).
12. Attached hereto and marked as **Exhibit “K”** is a true copy of Schedule 464111 to the San Forest GSA, dated December 1, 2020.
13. Attached hereto and marked as **Exhibit “L”** is a true copy of Schedule 465416 to the San Forest GSA, dated December 23, 2020.
14. Attached hereto and marked as **Exhibit “M”** is a true copy of the Initial Order of Justice Stephens granted in these proceedings on November 29, 2024.
15. Attached hereto and marked as **Exhibit “N”** is a true copy of the Amended and Restated Initial Order of Justice Stephens granted in these proceedings on December 9, 2024.
16. Attached hereto and marked as **Exhibit “O”** is a true copy of the Order of Justice Stephens granted in these proceedings on January 29, 2025.

17. Attached hereto and marked as **Exhibit "P"** is a true copy of the Order Nisi of Justice Jones granted in Supreme Court of British Columbia Action No. VLC-S-S-252264 on March 31, 2025.

18. Attached hereto and marked as **Exhibit "Q"** is a true copy of the Order of Justice G.C. Weatherill granted in Supreme Court of British Columbia Action No. VLC-S-S-252264 on October 9, 2025 approving sale of real property in foreclosure.

19. Attached hereto and marked as **Exhibit "R"** is a true copy of British Columbia Personal Property Registry search results for San Industries Ltd. dated July 30, 2026.

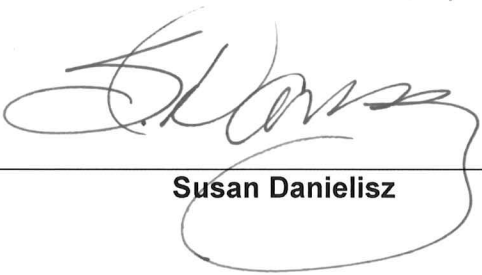
20. Attached hereto and marked as **Exhibit "S"** is a true copy of British Columbia Personal Property Registry search results for San Forest Products Ltd. dated August 11, 2026.

21. Attached hereto and marked as **Exhibit "T"** is a true copy of correspondence between counsel dated July 2, 2026 to September 14, 2026.

SWORN BEFORE ME at the City of
Vancouver, in the Province of British
Columbia, this 15th day of September,
2026.


A Commissioner for taking Affidavits for
British Columbia

MICHELLE de HAAS
Barrister & Solicitor
McCarthy Tétrault LLP
SUITE 2400 - 745 THURLOW STREET
VANCOUVER, B.C. V6E 0C5
DIRECT 604-643-7109


Susan Danielisz