

Supreme Court of Nova Scotia

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

5th 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, September 23, 2016, and November 18, 2016.

ACTIVITY SINCE NOVEMBER 24, 2016

5. Since the granting of the Extension Order on November 24, 2016, management of the Applicants has:
 - (a) With the assistance of counsel and the monitor, prepared a draft Plan Outline which was provided to secured creditors for discussion purposes;
 - (b) Proceeded with the harvest of the 2016 crop of mink, which is ultimately expected to produce between 78,000 and 80,000 pelts.
 - (c) Retained 36,000 mink as breeders. The Applicants continue with the process of fur grading selection, size selection and blood testing. This will result in approximately 9,000 more pelts being produced for sale. By the end of February there will be some 22,000 females and 5,000 males remaining as breeders.
 - (d) Planned that after mating in March all breeder males will be harvested. This will likely leave 20,000 to 21,000 fertile females. That will conclude the annual pelting giving a total number of pelts harvested at between 78,000 and 80,000, which will go to auction in May and July, 2017.
6. I am advised by the Applicants' counsel, Tim Hill, Q.C., and verily believe, that he has been engaged in discussions directly or through counsel with North American Fur Auctions Limited, Nova Scotia Farm Loan Board, Farm Credit Canada and American Legend Cooperative, who are the senior secured creditors of the Applicants.

