VANCOUVER
SEP 10 2026
REGISTRY

This is the 3rd affidavit of
Jennifer Alambre in this case and was
made on September 10, 2026

No. S-265325
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN

NATIONAL BANK OF CANADA

PETITIONER

AND

LABTEST CERTIFICATION INC., LABTEST CERTIFICATION ONTARIO INC., 2842878 ONTARIO INC., GOSHU PRODUCTS/SERVICES INC., KAVINDER SINGH DHILLON, AND MUANALYSIS INC.

RESPONDENTS

AFFIDAVIT

I, **Jennifer Alambre**, of 3500 – 1133 Melville Street, Vancouver, British Columbia, SWEAR THAT:

1. I am a legal assistant at Blake, Cassels & Graydon LLP, counsel for the National Bank of Canada (the "**Bank**"), the petitioner in this proceeding, and as such I have personal knowledge of the matters deposed to in this Affidavit, except where I depose to a matter based on information from an informant I identify, in which case I believe that both the information from the informant and the resulting statement are true.

2. Attached as **Exhibits A** to **I** of my affidavit are true copies of the following documents:

Correspondence

(a) **Exhibit "A"**: an email from Kavinder Singh Dhillon ("**Mr. Dhillon**") to the Bank dated March 25, 2026;

(b) **Exhibit "B"**: an email from Deloitte Restructuring Inc. ("**Deloitte**") to Mr. Dhillon dated May 21, 2026, attaching an information request list;

(c) **Exhibit "C"**: an email chain between Deloitte, Aman S. Bindra, and Mr. Dhillon dated from May 1, 2026 to May 26, 2026, attaching an updated information request list;

(d) **Exhibit "D"**: an email from Mr. Dhillon to the Bank dated May 26, 2026;

(e) **Exhibit "E"**: an email from Deloitte to Mr. Dhillon dated June 2, 2026, attaching, among other things, a further updated information request list;

(f) **Exhibit "F"**: an email chain between the Bank and Mr. Dhillon dated from June 25, 2026 to July 31, 2026;

(g) **Exhibit "G":** an email chain between Satinder Dhaliwal, Raminder Arora, and Encina Roh dated from August 25, 2026 to September 2, 2026;

Public Documents

(h) **Exhibit "H"**: British Columbia Assessment Roll Reports dated September 2, 2026 for the lands located at #204, #205, and #206-8291 92 Street in Delta, British Columbia and #3128-20800 Westminster Highway in Richmond, British Columbia; and

(i) **Exhibit "I"**: Ontario Assessment Roll Report dated September 2, 2026 for the lands located at 2520 and 2528 Bristol Circle in Oakville, Ontario.

SWORN BEFORE ME at Vancouver, British Columbia on September 10, 2026

A Commissioner for taking Affidavits for British Columbia

E. ROH
Barrister & Solicitor
BLAKE, CASSELS & GRAYDON LLP
1133 Melville Street
Suite 3500, The Stack
Vancouver, B.C. V6E 4E5
604-631-4254

Jennifer Alambre

This is **Exhibit "A"** referred to in the Affidavit of Jennifer Alambre made before me at Vancouver, BC, this 10th day of September, 2026.

A Commissioner for the taking of Affidavits for
British Columbia

From: Kavinder Dhillon <kdhillon@labtestcert.com>
Sent: Wednesday, March 25, 2026 4:25 PM
To: Pai, Raymond <raymond.pai@nbc.ca>
Cc: Rong, Sherry <sherry.rong@nbc.ca>
Subject: RE: LabTest

****
PRUDENCE/CAUTION - EXTERNE/EXTERNAL
****

Hi Ray,

Thank you for waiting.

I met with our accountants and explained our situation, plus discussed plan going forward.

To answer your question:

1. We agree to move forward having a senior financial person overlook our accounts. If you could share what you need from us and at same time what access he will need?
2. The financial for 2025, will take about 90 days to complete as per the accountants. The financial person will be able help expedite this process hopefully.

With regards to the outstanding loan for Goshu ($ 150k), please withdraw $75k from the account as this includes $50k for the current payment and the remaining for the back pay. Goshu account number is 0006-01471-0079321

As discussed, I am working to get the outstanding paid as fast as possible and get back in your good books. Your assistance is greatly appreciated.

Thank you,

Kavinder Dhillon (he, him), P.L.Eng.
LabTest Certification
T: 604-247-0444 Ext. 101 | M: 604-805-2016 | 1-855-346-0444
Head Office: 205 – 8291 92 Street, Delta, BC, V4G 0A4, Canada
Toronto: 2520 Bristol Circle, Oakville, ON, L6H 5S1, Canada
Las Vegas: 5977 McLeod Drive, Las Vegas, NV, 89120, USA
Richmond: 3128 – 20800 Westminster Hwy., Richmond, BC, V6V 2W3, Canada

www.labtestcert.com | kdhillon@labtestcert.com

VANCOUVER | RICHMOND | TORONTO | LAS VEGAS

This is **Exhibit "B"** referred to in the Affidavit of Jennifer Alambre made before me at Vancouver, BC, this 10th day of September, 2026.

A Commissioner for the taking of Affidavits for
British Columbia

From: Butt, Kaleb <kbutt@deloitte.ca>
Sent: Thursday, May 21, 2026 5:43 PM
To: Kavinder Dhillon
Cc: Keeble, Jeff
Subject: Outstanding requests
Attachments: _Labtest - Information Request List.xlsx

Hi Kavinder,

Further to our call this afternoon, attached is the current outstanding request list. I have marked items with priorities to assist yourself, Grace, and Pavan.

Let us know if you have any questions.

Regards,

Kaleb Butt, CPA
Manager | Strategy, Risk, and Transactions Group
Deloitte LLP
410 W Georgia St.,
Vancouver, BC, V6B 1Z3, Canada
D: (604) 595-5422 | M: (672) 963-9556
kbutt@deloitte.ca | www.deloitte.ca
--
Deloitte.

Labtest Certification Inc., Labtest Certification Ontario Inc., Muanalysis Inc., Goshu Products/Services Inc., 2842878 Ontario Inc., 1000066449 Ontario Inc., and 1188634 B.C. Ltd.
Information Request List

Updated to: 21-May-26

No.	Description	Status	Priority	Owner	Comments
General					
2	A corporate legal structure chart showing all related entities in the group and major shareholders.	Returned	High	Kavinder	*Please update to include all numbered co's and US entity(ies).*
4	Schedule of real property leases (location, landlord, rent amount, term)	Returned	Medium	Kavinder	*We have the lease for NV, the third party in Oakville, and the internal Oakville lease. Don't have internal BC leases.* *Is the 12468 82 Ave., Surrey location still leased?*
5	Copies of key agreements.	Requested	Medium	Kavinder	*Key accreditations perhaps, and expiries*
Recent financial statements and analysis					
9	2026 YTD income statements and balance sheets, monthly in excel	Returned	High	Pavan	*Please provide the detailed ON balance sheet; only a three-row summary was submitted.* *Please confirm currency of NV balance sheet.*
10	A detailed trial balance and general ledger for the past month end.	Returned	High	Pavan	*TB provided is only for b/s accounts for BC.* *Please provide P&L as well, on a weekly basis.* *ON and NV sales account shows much higher sales than what the last Salesforce export showed. Why?* *GL provided for all entities only appears to show entries relating to cash account - nothing else. Why?*
Working Capital and Cash					
12	Copies of Bank facility agreements/letters.	Requested	Medium	Kavinder	
13	Details/copies of any inter-creditor/subordination agreements between lenders/debt holders.	Requested	Medium	Kavinder	
14	Most recent aged accounts receivable analysis by customer, in excel.	Returned	High	Pavan	*Please provide estimate for amount of AR that hasn't yet been reconciled. Substantial difference between TB and 2026 subledger.* *Why does the GL still show unapplied AR?*
15	Most recent aged accounts payable analysis by supplier (including details of any prepaid balances), in excel.	Returned	High	Pavan	*Schedule looks to be missing vendors - for example, no CRA or property taxes. Please re-run*
17	List of all bank accounts and statements.	Requested	Urgent	Grace	*Please provide last 6 months of bank statements for all accounts - including RBC and Wells Fargo*
19	Forecast monthly analysis of Bank capital repayments, interest payments and charges.	Requested	Medium	Kavinder	
20	A summary of capital expenditure plans and commitments (by month).	Requested	Medium	Kavinder	
Assets, liabilities, and payroll					
22	Detailed fixed asset/equipment listing/register as well as details of any assets that have been disposed of within the past year.	Returned	Medium	Pavan	*Please provide a depreciated schedule. The schedule provided only shows purchased cost, even though some assets were purchased in 2003.* *Schedule as at Dec. 31, 2025 should work and can be tied to statements (or 2024)*
24	Details of related party receivables and payables. Amounts, parties, advance dates and payment terms.	Requested	Medium	Pavan	
25	List of any outstanding amounts due to employees for bonuses/wages/severance/vacation pay.	Requested	Urgent	Pavan	*Kavinder to pull overall amount outstanding. One week can be carried.*
26	Information on any outstanding insurance claims, pending litigation, collection actions, or liens filed.	Requested	Medium	Kavinder	*As well as existing policies*
28	Payroll source deductions CRA account number(s) and copy of account balance (latest statement). Details of any pending audits.	Requested	High	Kavinder	*Include PSD audit results once known.*

29	WorksafeBC and WSIB account number(s) and copy of account balance (if any).	Requested	High	Grace	*Please provide actual statements provided directly by WorksafeBC*
32	PST account number(s) and copy of account balance, if any (latest statement). Details of any pending audits.	Requested	High	Kavinder	*Please provide actual statements provided directly by Province*
33	List of all employees, including their position, location, length of employment, salary and other compensation.	Rejected	N/A	Grace	*Kavinder has declined to provide.*
36	Details of any US government or Nevada state remittances.	Rejected	N/A	Pavan	*Kavinder has declined to provide. Says no issues with amounts owing.*
37	Property tax statements for current year, including any arrears, for all properties.	Requested	High	Kavinder	*Kavinder to look into whether any BC arrears remains. Please provide amount/timing of Oakville payment plan.*
Forecast and Business Plan and Other					
48	Salesforce access	Rejected	N/A	Pavan	*Will not provide due to cost.*
49	Agreements with partner labs (Taiwan, Japan, etc.)	Requested	Medium	Grace	
50	Nevada FY23-24 statements	Requested	High	Kavinder	
51	NFPA dataroom items	Requested	Medium	Kavinder	

This is **Exhibit "C"** referred to in the Affidavit of Jennifer Alambre made before me at Vancouver, BC, this 10th day of September, 2026.

A Commissioner for the taking of Affidavits for *British Columbia*

From: Butt, Kaleb <kbutt@deloitte.ca>
Sent: Tuesday, May 26, 2026 12:49 PM
To: Kavinder Dhillon
Cc: Keeble, Jeff
Subject: RE: [EXT] RE: RE:FW: Proposed share sale to NMi Group
Attachments: _Labtest - Information Request List.xlsx

Hi Kavinder,

Thank you for providing these. See attached the updated request list. Let me know if I should follow up with Grace and Pavan directly for the remaining items (I will remove the last item re NFPA before doing so).

Regards,

Kaleb Butt, CPA
Manager | Strategy, Risk, and Transactions Group
Deloitte LLP
D: (604) 595-5422 | M: (672) 963-9556
kbutt@deloitte.ca | www.deloitte.ca

From: Kavinder Dhillon
Sent: Monday, May 25, 2026 18:59
To: Butt, Kaleb
Cc: Keeble, Jeff
Subject: [EXT] RE: RE:FW: Proposed share sale to NMi Group

Hello Kaleb,

Please find attached our vacation tracker.

There has been zero transaction, therefore nothing being printed for ON Savings, see attached.

Regards,

Kavinder Dhillon (he, him), P.L.Eng.
LabTest Certification
T: 604-247-0444 Ext. 101 | M: 604-805-2016 | 1-855-346-0444
Head Office: 205 – 8291 92 Street, Delta, BC, V4G 0A4, Canada
Toronto: 2520 Bristol Circle, Oakville, ON, L6H 5S1, Canada
Las Vegas: 5977 McLeod Drive, Las Vegas, NV, 89120, USA
Richmond: 3128 – 20800 Westminster Hwy., Richmond, BC, V6V 2W3, Canada

www.labtestcert.com | kdhillon@labtestcert.com

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Please consider the environment before printing this e-mail.

From: Butt, Kaleb <kbutt@deloitte.ca>
Sent: May 25, 2026 10:15 AM
To: Kavinder Dhillon <kdhillon@labtestcert.com>
Cc: Keeble, Jeff <jkeeble@deloitte.ca>
Subject: RE:FW: Proposed share sale to NMi Group

CAUTION : External Email

Thanks Kavinder. Can you confirm if account "ON CAD Sav – 9572" has been closed? I do not see it in the attached list.

I also did not see details on the current vacation accrual come through, if you could please provide.

Regards,

Kaleb Butt, CPA
Manager | Strategy, Risk, and Transactions Group
Deloitte LLP
D: (604) 595-5422 | M: (672) 963-9556
kbutt@deloitte.ca | www.deloitte.ca

From: Kavinder Dhillon <kdhillon@labtestcert.com>
Sent: Sunday, May 24, 2026 23:35
To: Butt, Kaleb <kbutt@deloitte.ca>
Cc: Keeble, Jeff <jkeeble@deloitte.ca>
Subject: [EXT] RE: RE:FW: Proposed share sale to NMi Group

Hello Kaleb,

Please find attached the requested information.

Regards,

Kavinder Dhillon (he, him), P.L.Eng.
LabTest Certification
T: 604-247-0444 Ext. 101 | M: 604-805-2016 | 1-855-346-0444

Head Office: 205 – 8291 92 Street, Delta, BC, V4G 0A4, Canada
Toronto: 2520 Bristol Circle, Oakville, ON, L6H 5S1, Canada
Las Vegas: 5977 McLeod Drive, Las Vegas, NV, 89120, USA
Richmond: 3128 – 20800 Westminster Hwy., Richmond, BC, V6V 2W3, Canada

www.labtestcert.com | kdhillon@labtestcert.com

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From: Butt, Kaleb <kbutt@deloitte.ca>
Sent: May 22, 2026 10:26 AM
To: Kavinder Dhillon <kdhillon@labtestcert.com>
Cc: Keeble, Jeff <jkeeble@deloitte.ca>
Subject: RE:FW: Proposed share sale to NMi Group

CAUTION : External Email

Hi Kavinder,

Thank you for providing. Could you please send the following remaining RBC statements for 2026 YTD as well:

- ON USD - 6396
- ~~ON CAD Chq - 9515~~
- ON CAD Sav - 9572
- BC USD - 6354
- ~~BC CAD Chq - 9069~~
- BC CAD Sav - 9481
- ~~Goshu CAD Chq -1822~~

Thanks,

Kaleb Butt, CPA
Manager | Strategy, Risk, and Transactions Group
Deloitte LLP
D: (604) 595-5422 | M: (672) 963-9556
kbutt@deloitte.ca | www.deloitte.ca

From: Kavinder Dhillon <kdhillon@labtestcert.com>
Sent: Thursday, May 21, 2026 17:42
To: Keeble, Jeff <jkeeble@deloitte.ca>
Cc: Butt, Kaleb <kbutt@deloitte.ca>
Subject: [EXT] RE: RE:FW: Proposed share sale to NMi Group

Hello Jeff,

Following is the latest developments:

NMI Offer:

> Hi Kavinder,
>
> Thank you again for your time earlier today, always a pleasure.
>
> As mentioned, we had a board meeting today in which we managed to get a tentative clearance (still need final approval) on the following Non-Binding deal structure (cash-free and debt-free), based on an Enterprise Value of CAD 40 million (16x LTM June 2026 EBITDA assumed of CAD 2.5m):
>
> - **CAD 30 million at closing**
>   - CAD 20 million cash
>   - CAD 10 million rolled over
> - **CAD 10 million in 3 earn-outs**
>   - 33% will be payable in September 2027 and calculated linearly between a 5% and 20% EBITDA growth between LTM June 2026 and LTM June 2027
>   - 2/3rds will be payable in cash
>   - 1/3rd will be rolled over
>   - Assuming an LTM June 2026 EBITDA of CAD 2,498k, the minimum EBITDA for LTM June 2027 is CAD 2,622k and the Earn-out 1 Target: CAD 2,997
>   - 33% will be payable in September 2028 and calculated linearly between a 5% and 18% EBITDA growth between LTM June 2027 and LTM June 2028
>   - 2/3rds will be payable in cash
>   - 1/3rd will be rolled over
>   - Assuming an LTM June 2026 EBITDA of CAD 2,498k, the minimum EBITDA for LTM June 2028 is CAD 3,147k k and the Earn-out 2 Target: CAD 3,536
>   - 33% will be payable in September 2029 and calculated linearly between a 5% and 15% EBITDA growth between LTM June 2028 and LTM June 2029
>   - 2/3rds will be payable in cash
>   - 1/3rd will be rolled over
>   - Assuming an LTM June 2026 EBITDA of CAD 2,498k, the minimum EBITDA for LTM June 2029 is CAD 3,713k and the Earn-out 3 Target: CAD 4,067
>
> As I also mentioned, this took some efforts to get a tentative clearance on this. If you can agree to this deal structure (obviously still need to discuss other terms in the Heads of Agreement, "HoA"), we will get all the green lights on our side and formally confirm through an updated HoA & Exclusivity letter, reflecting the above.
>
> Happy to hop on a call and provide a voice-over.

Kind regards,
Esteban

The initial buy is $ 30M where I would pocket $20M at signing. This along will pay off all my dept. There completion date is June 2026. They are just waiting for me to accept. I have few items that need to be confirmed with my M&A Lawyers and Accountants.

I do have a second potential party as noted, NFPA who is going through their board. They have agreed in concept and are internally reviewing. Following was the concept:

As a concept and an example, what if I suggested the following:

- Initial buyout at signing: CAN $ 30M
- Earn-out over 2 years based on the below formula:
  - Payment = CAN $ 10,000,000 x (Actual LTM revenue Growth% / Target Growth%)
  - Growth target 25%
  - Revenue growth is Gross Revenue
- LabTest be allowed for 3 years to invest in business while maintaining a minimum EBITDA of 20%. The investment needed will be for:
  - Battery Storage Testing: US $ 400k
  - Wind Tunnel Testing: US $ 475k
  - Setting up for Fire Door Testing: US $ 550k

The second offer gets me more money and guaranteed money where as the NMI offer gives me potential to make more in the long run. The team at NMI wants me to decide early next week to finalize and complete in June. I have advised NFPA that I have to decide soon.

With regards to day-day LabTest business, the last 2 months have been good for LabTest where we invoiced around $ 940K of business per month. This AR is slowing coming in and allowing us to catch up on our vender payments and also make good with NBC payments, the extra $ 25k per month to pay down the 3 missed months of rent. One month has been paid. There is only 2 months outstanding. In addition, weekly payments are being paid to CRA.

The bi-weekly gross payroll for BC is $94k and for Ontario is $19k.

I will work on getting you the outstanding vacation owning for each location (BC and ON). RBC Chequing account statements attached.

Thank you for your assistance.

Kavinder Dhillon (he, him), P.L.Eng.
LabTest Certification
T: 604-247-0444 Ext. 101 | M: 604-805-2016 | 1-855-346-0444
Head Office: 205 – 8291 92 Street, Delta, BC, V4G 0A4, Canada
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Las Vegas: 5977 McLeod Drive, Las Vegas, NV, 89120, USA
Richmond: 3128 – 20800 Westminster Hwy., Richmond, BC, V6V 2W3, Canada

www.labtestcert.com | kdhillon@labtestcert.com

VANCOUVER | RICHMOND | TORONTO | LAS VEGAS

From: Keeble, Jeff <jkeeble@deloitte.ca>
Sent: May 14, 2026 5:23 PM
To: Kavinder Dhillon <kdhillon@labtestcert.com>
Cc: Butt, Kaleb <kbutt@deloitte.ca>
Subject: RE:FW: Proposed share sale to NMi Group

CAUTION : External Email

Hi Kavinder,

We waited for you to join the weekly update call scheduled for 4:30 p.m. today and left a voicemail on your cell phone when you did not connect.

Please advise when you are available to speak. We have a scheduled update call with the Bank tomorrow morning at 8:30 a.m. If you are not able to connect with us in advance, please provide a written update covering the following:

- Current operations and cash flow
- Status of the NMI and NFPA transactions
- Status of the outstanding information requests

Regards,

Jeff Keeble, CPA, CA, CIRP, LIT, CBV
Deloitte
Partner | Strategy, Risk and Transactions
410 West Georgia Street, Vancouver, British Columbia, V6B 0S7, Canada
D: 604-235-4197 | M: 604-360-1746
jkeeble@deloitte.ca | www.deloitte.ca

From: Kavinder Dhillon <kdhillon@labtestcert.com>
Sent: May 6, 2026 4:03 PM
To: Butt, Kaleb <kbutt@deloitte.ca>; Keeble, Jeff <jkeeble@deloitte.ca>
Subject: [EXT] FW: Proposed share sale to NMi Group

Hello,

Upon meeting with my lawyers, they provided the below feedback which I shared with NMI.

I have attached what I was shared by NFPA.

What I am looking for from NMI is:

- $25M at buyout: This will be use the pay-off all dept (NBC and CRA and anyone else) and still pocket a few $M
- Earn-out not to have minimum threshold

Regards,

Kavinder Dhillon (he, him), P.L.Eng.
LabTest Certification
T: 604-247-0444 Ext. 101 | M: 604-805-2016 | 1-855-346-0444
Head Office: 205 – 8291 92 Street, Delta, BC, V4G 0A4, Canada
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Richmond: 3128 – 20800 Westminster Hwy., Richmond, BC, V6V 2W3, Canada

www.labtestcert.com | kdhillon@labtestcert.com

VANCOUVER | RICHMOND | TORONTO | LAS VEGAS

From: Aman S. Bindra <ABindra@kswlawyers.ca>
Sent: May 6, 2026 1:48 PM
To: Kavinder Dhillon <kdhillon@labtestcert.com>; Satinder Dhaliwal <sdhaliwal@kswlawyers.ca>
Subject: RE: Proposed share sale to NMi Group

CAUTION : External Email

Hi Kavinder,

Thanks for sending over the employment agreements – we'll get a quote from our labour and employment group for the review, and connect them with you directly should you wish to proceed with the quote.

In terms of the share sale transaction, the final cost will ultimately depend on the amount of work that needs to be done. Our rate is $380/hour plus taxes and disbursements, and we are still very early in the process and don't yet have enough information to provide a firm quote, as we don't know how much work this will entail or how far along the path we will go with any of these buyer groups. The LOI still needs to be negotiated and signed, and then we will need to proceed to negotiation of the definitive share purchase agreement and completion of disclosure schedules, which will likely be complicated and time-intensive, given the size and nature of this transaction. Once the share purchase agreement and schedules are finalized, closing documents will need to be prepared and reviewed, and we will need to deal with lenders for payouts and PPR discharges, and with third parties for transfers or consents for any licenses or permits which may be required. There will also be cross-jurisdictional legal issues and correspondence with your Ontario and Nevada lawyers required. The range of any quote we provide now will be very wide since there are still so many moving parts and unknowns, so it would not be very meaningful for you. Sat and I have both handled many M&A transactions for 8 and 9-figure sale prices, and we've seen firms charge anywhere from $25k to a few hundred thousand dollars, depending on how many complications or moving parts there are to manage. The downtown Vancouver law firms charge on the higher end of the spectrum – our fees are reasonable and fair for our clients, but final cost ultimately depends on the amount of work involved.

Our fees also would not include the costs of your Ontario and Nevada counsel with respect to the transfers of those shares and third party consents/licences, including the sale of MUAnalysis Inc. (Ontario) to Goshu Products/Services Inc. (BC) before completion.

Thanks,
Aman

Aman S. Bindra
Partner
Practising as a Law Corporation

604.591.7321 ext: 309

604.591.7149

ABindra@kswlawyers.ca

KSW Lawyers #220-7565 132nd Street, Surrey, BC, V3W 1K5

From: Kavinder Dhillon <kdhillon@labtestcert.com>
Sent: May 6, 2026 1:07 PM
To: Aman S. Bindra <ABindra@kswlawyers.ca>; Satinder Dhaliwal <sdhaliwal@kswlawyers.ca>
Cc: Christina Wolfe <CWolfe@kswlawyers.ca>
Subject: RE: Proposed share sale to NMi Group

sophospsmartbannerend
Hi Aman/Sat,

Thank you for taking time yesterday to meet with me providing insight with all the hidden risks.

Going forward, as you know what you are getting into with me could you please provide me with your charge/fees. That way I will not be shocked 😊

I have also attached our new service agreements that we wish to have all our employees sign to address changes in the labour rules. Could you please let me know what would be your charge to review and provide any feedback. See agreements attached.

Please find attached the four agreements:

- Employee Agreement BC - General Employee
- Employee Agreement BC - Sales Employee
- Employee Agreement ON - General Employee
- Employee Agreement ON - Sales Employee

Once again thank you for your assistance.

Regards,

Kavinder Dhillon (he, him), P.L.Eng.
LabTest Certification
T: 604-247-0444 Ext. 101 | M: 604-805-2016 | 1-855-346-0444
Head Office: 205 – 8291 92 Street, Delta, BC, V4G 0A4, Canada
Toronto: 2520 Bristol Circle, Oakville, ON, L6H 5S1, Canada
Las Vegas: 5977 McLeod Drive, Las Vegas, NV, 89120, USA
Richmond: 3128 – 20800 Westminster Hwy., Richmond, BC, V6V 2W3, Canada

www.labtestcert.com | kdhillon@labtestcert.com

VANCOUVER | RICHMOND | TORONTO | LAS VEGAS

From: Aman S. Bindra <ABindra@kswlawyers.ca>
Sent: May 5, 2026 5:11 PM
To: Kavinder Dhillon <kdhillon@labtestcert.com>
Cc: Satinder Dhaliwal <sdhaliwal@kswlawyers.ca>; Christina Wolfe <CWolfe@kswlawyers.ca>
Subject: RE: Proposed share sale to NMi Group

CAUTION : External Email

Hi Kavinder,

Thanks again for taking the time to meet today. Further to our discussion regarding the attached Heads of Agreement/Letter of Intent, our understanding of the proposed transaction structure is as follows:

i. Goshu Products Services Inc. is a BC company which owns the shares of LabTest Certification Inc. (BC) (the "**OpCo**") and all of the real estate which the OpCo currently uses in Canada (an Oakville, Ontario property and 2 BC properties). Once the shares of the OpCo are sold to the buyer, the OpCo, as tenant, will need to lease back the properties from Goshu Products Services Inc., as landlord, meaning new leases will need to be entered into. This should be reflected in the LOI.
ii. Lab TestCertification Inc. (BC) owns the shares of 1000066449 Ontario Inc., which then in turns owns the shares of LabTest Certification Ontario Inc.
iii. You personally owns the shares of LabTest Certification Inc., the Nevada company.
iv. In accordance with our understanding above, the Vendors would be Goshu Products Services Inc. (as to the shares of LabTest Certification Inc. (BC), which would include ownership of the Ontario subsidiaries) and Kavinder Singh Dhillon (as to the shares of LabTest Certification Inc. (NV)).

We understand that your key concerns are:

i. **Earn-Out Structure:** The Earn-Out Structure seems back-loaded and risky, as only CAD 20M is payable at Closing, with CAD 30M contingent on earn-out targets. The targets escalate materially year-over-year, meaning the Seller bears most of the performance risk post-Closing while the Buyer controls the business. Furthermore, if EBITDA misses any target by even slightly more than 12.5%, the entire earn-out for that year is forfeited, not a pro-rated reduction. There is also an EBITDA margin condition (≥22.5%) which acts as an additional gate. All earn-out EBITDA figures are calculated based on management accounts "as approved by the board of Topco Precise B.V.", which is a Buyer-controlled entity. The Seller has no independent verification rights in the current draft LOI.
Provided you are fine with an earn-out structure, you'd want, at minimum, a sliding scale from the first dollar of underperformance, and a covenant from the Buyer that there will be no material changes to the business model, no stripping of revenue, no allocation of Buyer Group overhead, no manipulation of intercompany transactions that depress EBITDA, and a covenant to operate the business in the ordinary course post-closing. You can also ask for the EBITDA margin condition to be removed or at least reduced from 22.5%. You should also ask for an independent accountant determination mechanism and dispute resolution process for the calculation of EBITDA.
ii. **Reinvestment Obligations:** You are also required to reinvest 30% of both Closing proceeds and each earn-out payment into the Buyer Group. 98% of the Shares you will receive in the Buyer Group will be in preference shares paying a 12% coupon, meaning for any earn-out tranches paid in 2027, 2028, and 2029, the coupon period before any exit could be very short. The economic return depends entirely on the timing of a Buyer Group exit, which you will have no control over. You will also be subject to standard equity document restrictions including drag-along and leaver provisions, which should be received a Dutch lawyer as the shareholders' agreement will likely be governed by Dutch law.

Based on our discussion, and given that you have other Buyer groups making unsolicited offers to purchase your companies, you may wish to simplify the structure by asking for a revised LOI which reflects a higher cash payment at Closing (perhaps $25-35 million – whichever number you feel you are willing to sell the Company for) with no reinvestment obligations. If the Buyer wishes for you to remain onboard post-closing to assist with the transition and help grow the company, you can sign a Consulting Agreement under which you are compensated partly in cash and partly in shares of the Buyer group.

Please let us know if you have any questions.

Thanks,
Aman

Aman S. Bindra
Partner
Practising as a Law Corporation

604.591.7321 ext: 309

604.591.7149

ABindra@kswlawyers.ca

KSW Lawyers #220-7565 132nd Street, Surrey, BC, V3W 1K5

From: Kavinder Dhillon <kdhillon@labtestcert.com>
Sent: May 1, 2026 11:36 AM
To: Aman S. Bindra <ABindra@kswlawyers.ca>
Cc: Satinder Dhaliwal <sdhaliwal@kswlawyers.ca>; Christina Wolfe <CWolfe@kswlawyers.ca>
Subject: RE: Introduction

sophospsmartbannerend
Hello Aman,

Please find attached the documents received.

Regards,

Kavinder Dhillon (he, him), P.L.Eng.
LabTest Certification
T: 604-247-0444 Ext. 101 | M: 604-805-2016 | 1-855-346-0444
Head Office: 205 – 8291 92 Street, Delta, BC, V4G 0A4, Canada
Toronto: 2520 Bristol Circle, Oakville, ON, L6H 5S1, Canada
Las Vegas: 5977 McLeod Drive, Las Vegas, NV, 89120, USA
Richmond: 3128 – 20800 Westminster Hwy., Richmond, BC, V6V 2W3, Canada

www.labtestcert.com | kdhillon@labtestcert.com

VANCOUVER | RICHMOND | TORONTO | LAS VEGAS

Labtest Certification Inc., Labtest Certification Ontario Inc., Muanalysis Inc., Goshu Products/Services Inc., 2842878 Ontario Inc., 1000066449 Ontario Inc., and 1188634 B.C. Ltd.
Information Request List

Updated to: 26-May-26

No.	Description	Status	Priority	Owner	Comments
General					
2	A corporate legal structure chart showing all related entities in the group and major shareholders.	Returned	High	Kavinder	*Please update to include all numbered co's and US entity(ies).*
4	Schedule of real property leases (location, landlord, rent amount, term)	Returned	Medium	Kavinder	*We have the lease for NV, the third party in Oakville, and the internal Oakville lease. Don't have internal BC leases.* *Is the 12468 82 Ave., Surrey location still leased?*
5	Copies of key agreements.	Requested	Medium	Kavinder	*Key accreditations perhaps, and expiries*
Recent financial statements and analysis					
9	2026 YTD income statements and balance sheets, monthly in excel	Returned	High	Pavan	*Please provide the detailed ON balance sheet; only a three-row summary was submitted.* *Please confirm currency of NV balance sheet.*
10	A detailed trial balance and general ledger for the past month end.	Returned	High	Pavan	*TB provided is only for b/s accounts for BC.* *Please provide P&L as well, on a weekly basis.* *ON and NV sales account shows much higher sales than what the last Salesforce export showed. Why?* *GL provided for all entities only appears to show entries relating to cash account - nothing else. Why?*
Working Capital and Cash					
12	Copies of Bank facility agreements/letters.	Requested	Medium	Kavinder	
13	Details/copies of any inter-creditor/subordination agreements between lenders/debt holders.	Requested	Medium	Kavinder	
14	Most recent aged accounts receivable analysis by customer, in excel.	Returned	High	Pavan	*Please provide estimate for amount of AR that hasn't yet been reconciled. Substantial difference between TB and 2026 subledger.* *Why does the GL still show unapplied AR?*
15	Most recent aged accounts payable analysis by supplier (including details of any prepaid balances), in excel.	Returned	High	Pavan	*Schedule looks to be missing vendors - for example, no CRA or property taxes. Please re-run*
19	Forecast monthly analysis of Bank capital repayments, interest payments and charges.	Requested	Medium	Kavinder	
20	A summary of capital expenditure plans and commitments (by month).	Requested	Medium	Kavinder	
Assets, liabilities, and payroll					
22	Detailed fixed asset/equipment listing/register as well as details of any assets that have been disposed of within the past year.	Returned	Medium	Pavan	*Please provide a depreciated schedule. The schedule provided only shows purchased cost, even though some assets were purchased in 2003.* *Schedule as at Dec. 31, 2025 should work and can be tied to statements (or 2024)*
24	Details of related party receivables and payables. Amounts, parties, advance dates and payment terms.	Requested	Medium	Pavan	
26	Information on any outstanding insurance claims, pending litigation, collection actions, or liens filed.	Requested	Medium	Kavinder	*As well as existing policies*
28	Payroll source deductions CRA account number(s) and copy of account balance (latest statement). Details of any pending audits	Requested	High	Kavinder	*Include PSD audit results once known.*
29	WorksafeBC and WSIB account number(s) and copy of account balance (if any).	Requested	High	Grace	*Please provide actual statements provided directly by WorksafeBC*
32	PST account number(s) and copy of account balance, if any (latest statement). Details of any pending audits.	Requested	High	Kavinder	*Please provide actual statements provided directly by Province*

37	Property tax statements for current year, including any arrears, for all properties.	Requested	High	Kavinder	*Kavinder to look into whether any BC arrears remains. Please provide amount/timing of Oakville payment plan.*
Forecast and Business Plan and Other					
49	Agreements with partner labs (Taiwan, Japan, etc.)	Requested	Medium	Grace	
50	Nevada FY23-24 statements	Requested	High	Kavinder	
51	NFPA dataroom items	Requested	Medium	Kavinder	

This is **Exhibit "D"** referred to in the Affidavit of Jennifer Alambre made before me at Vancouver, BC, this 10th day of September, 2026.

A Commissioner for the taking of Affidavits for
British Columbia

From: Kavinder Dhillon <kdhillon@labtestcert.com>
Sent: Tuesday, May 26, 2026 8:24 AM
To: Pai, Raymond
Cc: Butt, Kaleb; Keeble, Jeff
Subject: Mortgage Payment - May 2026

****
PRUDENCE/CAUTION - EXTERNE/EXTERNAL
****

Ray,

I have noticed that NBC has not withdrawn the mortgage payment from Goshu (0006-01471-0079321) for May 2026?

- $ 50,400 for mortgage; and
- $ 25,000 for past make-up

Regards,

Kavinder Dhillon (he, him), P.L.Eng.
LabTest Certification
T: 604-247-0444 Ext. 101 | M: 604-805-2016 | 1-855-346-0444
Head Office: 205 – 8291 92 Street, Delta, BC, V4G 0A4, Canada
Toronto: 2520 Bristol Circle, Oakville, ON, L6H 5S1, Canada
Las Vegas: 5977 McLeod Drive, Las Vegas, NV, 89120, USA
Richmond: 3128 – 20800 Westminster Hwy., Richmond, BC, V6V 2W3, Canada

www.labtestcert.com| kdhillon@labtestcert.com

VANCOUVER | RICHMOND | TORONTO | LAS VEGAS

This is **Exhibit "E"** referred to in the Affidavit of Jennifer Alambre made before me at Vancouver, BC, this 10th day of September, 2026.

A Commissioner for the taking of Affidavits for
British Columbia

From: Butt, Kaleb <kbutt@deloitte.ca>
Sent: Tuesday, June 2, 2026 10:56 AM
To: Kavinder Dhillon
Cc: Keeble, Jeff
Subject: RBC and NBC account review.
Attachments: _Labtest - Information Request List.xlsx; RBC 2026 Statements for NBC.pdf; NBC statements.zip

Hi Kavinder,

We have conducted a review of the RBC bank accounts you sent us, as well as NBC statements provided to us directly by NBC. Following this review, we are seeking details regarding some transactions to better understand the Company's cash management procedures and sources/uses of cash.

Request

1. The Company has a number of large "DIRECT DEP PDS" transactions in RBC accounts -9069 and -9515. Could you please:
    a) Explain the nature/workflow of "DIRECT DEP PDS" transactions in general; and
    b) Provide details specifically regarding the $30,000 transaction in account -9069 on March 19; and
    c) Provide details specifically regarding the $46,198 transaction in account -9069 on February 12.
2. We have identified regular payments totalled "BILL PYMT AMEX CARDS." We were not aware the Company had credit beyond that provided by RBC and/or NBC. Could you please explain:
    a) The nature of AMEX transactions; and
    b) Which legal entities hold the AMEX card(s); and
    c) Whether any other credit cards are used by the Companies.
3. We have identified wires sent by accounts -9069 and -6354. Could you please;
    a) Explain the nature/workflow of "WEB PAYMENT WIRE" transactions in general; and
    b) Provide details specifically regarding the $9,800 (USD) transaction in account -6354 on March 10.
4. The attached RBC and NBC bank statements have a number of transfers highlighted in orange/yellow that we were unable to trace between accounts (e.g., we could not see the corresponding amount enter or leave another RBC or NBC account). For each one, please provide the account number that the funds were sent to.
    a) Among the highlighted entries, we identified payments to "LC KOREA." Is this Labtest Certification Korea? We were not aware of this entity.
    b) We also identified e-transfers to a Mike van Eykere – what do these relate to?

I have also attached the existing information request list. Let me know if I should discuss it or the above directly with Pavan and/or Grace.

Thanks and kind regards,

Kaleb Butt, CPA
Manager | Strategy, Risk, and Transactions Group
Deloitte LLP
410 W Georgia St.,
Vancouver, BC, V6B 1Z3, Canada
D: (604) 595-5422 | M: (672) 963-9556
kbutt@deloitte.ca | www.deloitte.ca
--
Deloitte.

Labtest Certification Inc., Labtest Certification Ontario Inc., Muanalysis Inc., Goshu Products/Services Inc., 2842878 Ontario Inc., 1000066449 Ontario Inc., and 1188634 B.C. Ltd.
Information Request List

Updated to: 26-May-26

No.	Description	Status	Priority	Owner	Comments
General					
2	A corporate legal structure chart showing all related entities in the group and major shareholders.	Returned	High	Kavinder	*Please update to include all numbered co's and US entity(ies).*
4	Schedule of real property leases (location, landlord, rent amount, term)	Returned	Medium	Kavinder	*We have the lease for NV, the third party in Oakville, and the internal Oakville lease. Don't have internal BC leases.* *Is the 12468 82 Ave., Surrey location still leased?*
5	Copies of key agreements.	Requested	Medium	Kavinder	*Key accreditations perhaps, and expiries*
Recent financial statements and analysis					
9	2026 YTD income statements and balance sheets, monthly in excel	Returned	High	Pavan	*Please provide the detailed ON balance sheet; only a three-row summary was submitted.* *Please confirm currency of NV balance sheet.*
10	A detailed trial balance and general ledger for the past month end.	Returned	High	Pavan	*TB provided is only for b/s accounts for BC.* *Please provide P&L as well, on a weekly basis.* *ON and NV sales account shows much higher sales than what the last Salesforce export showed. Why?* *GL provided for all entities only appears to show entries relating to cash account - nothing else. Why?*
Working Capital and Cash					
12	Copies of Bank facility agreements/letters.	Requested	Medium	Kavinder	
13	Details/copies of any inter-creditor/subordination agreements between lenders/debt holders.	Requested	Medium	Kavinder	
14	Most recent aged accounts receivable analysis by customer, in excel.	Returned	High	Pavan	*Please provide estimate for amount of AR that hasn't yet been reconciled. Substantial difference between TB and 2026 subledger.* *Why does the GL still show unapplied AR?*
15	Most recent aged accounts payable analysis by supplier (including details of any prepaid balances), in excel.	Returned	High	Pavan	*Schedule looks to be missing vendors - for example, no CRA or property taxes. Please re-run*
19	Forecast monthly analysis of Bank capital repayments, interest payments and charges.	Requested	Medium	Kavinder	
20	A summary of capital expenditure plans and commitments (by month).	Requested	Medium	Kavinder	
Assets, liabilities, and payroll					
22	Detailed fixed asset/equipment listing/register as well as details of any assets that have been disposed of within the past year.	Returned	Medium	Pavan	*Please provide a depreciated schedule. The schedule provided only shows purchased cost, even though some assets were purchased in 2003.* *Schedule as at Dec. 31, 2025 should work and can be tied to statements (or 2024)*
24	Details of related party receivables and payables. Amounts, parties, advance dates and payment terms.	Requested	Medium	Pavan	
26	Information on any outstanding insurance claims, pending litigation, collection actions, or liens filed.	Requested	Medium	Kavinder	*As well as existing policies*
28	Payroll source deductions CRA account number(s) and copy of account balance (latest statement). Details of any pending audits.	Requested	High	Kavinder	*Include PSD audit results once known.*
29	WorksafeBC and WSIB account number(s) and copy of account balance (if any).	Requested	High	Grace	*Please provide actual statements provided directly by WorksafeBC*
32	PST account number(s) and copy of account balance, if any (latest statement). Details of any pending audits.	Requested	High	Kavinder	*Please provide actual statements provided directly by Province*

33	List of all employees, including their position, location, length of employment, salary and other compensation.	Rejected	N/A	Grace	*Kavinder has declined to provide.*
36	Details of any US government or Nevada state remittances.	Rejected	N/A	Pavan	*Kavinder has declined to provide. Says no issues with amounts owing.*
37	Property tax statements for current year, including any arrears, for all properties.	Requested	High	Kavinder	*Kavinder to look into whether any BC arrears remains. Please provide amount/timing of Oakville payment plan.*
Forecast and Business Plan and Other					
48	Salesforce access	Rejected	N/A	Pavan	*Will not provide due to cost.*
49	Agreements with partner labs (Taiwan, Japan, etc.)	Requested	Medium	Grace	
51	Bank account analysis support.	Requested	High		

This is **Exhibit "F"** referred to in the Affidavit of Jennifer Alambre made before me at Vancouver, BC, this 10th day of September, 2026.

A Commissioner for the taking of Affidavits for *British Columbia*

From: Pai, Raymond <raymond.pai@nbc.ca>
Sent: Friday, July 31, 2026 1:09 PM
To: Kavinder Dhillon
Cc: Rong, Sherry
Subject: Re: Outstanding "Goshu Products/Services Inc"

Hi Kavinder,

There remain to be many outstanding defaults that have not been rectified; the loan is not in good standing; and the full amount of the loan Indebtedness has been demanded and remains due and owing. Given the circumstances, please direct communications through legal counsel.

Thank you,

NATIONAL BANK

Ray Pai
Senior Director, Special Loans
Tel.: 403-973-7203

National Bank of Canada

From: Kavinder Dhillon <kdhillon@labtestcert.com>
Sent: Friday, July 31, 2026 1:55 PM
To: Pai, Raymond <raymond.pai@nbc.ca>
Cc: Rong, Sherry <sherry.rong@nbc.ca>
Subject: Re: Outstanding "Goshu Products/Services Inc"

Hi Ray,

Please confirm the outstanding to bring my account into good standing.

We can set up a MS Teams call.

Regards,

Kavinder Dhillon (he, him), P.L.Eng.
LabTest Certification
T: 604-247-0444 Ext. 101 | M: 604-805-2016 | 1-855-346-0444

Head Office: 205 – 8291 92 Street, Delta, BC, V4G 0A4, Canada
Toronto: 2520 Bristol Circle, Oakville, ON, L6H 5S1, Canada
Las Vegas: 5977 McLeod Drive, Las Vegas, NV, 89120, USA
Richmond: 3128 – 20800 Westminster Hwy., Richmond, BC, V6V 2W3, Canada
Dallas: 2363 Merritt Dr., Ste. 100, Garland, TX, 75041, USA

www.labtestcert.com| kdhillon@labtestcert.com

VANCOUVER | RICHMOND | TORONTO | LAS VEGAS | DALLAS

From: Kavinder Dhillon
Sent: Thursday, June 25, 2026 2:28 PM
To: Pai, Raymond <raymond.pai@nbc.ca>
Cc: Rong, Sherry <sherry.rong@nbc.ca>; Butt, Kaleb <kbutt@deloitte.ca>; Keeble, Jeff <jkeeble@deloitte.ca>; Alambre, Jennifer <jennifer.alambre@blakes.com>
Subject: Outstanding "Goshu Products/Services Inc"

Hello Ray,

Please advise the outstanding balance owing for the missed mortgages for Goshu Products/Services Inc.?

As per the NBC bank records the following payments have been made:

- 2026-02-27 $ 50,337.44
- 2026-03-30 $ 50,337.44
- 2026-03-30 $ 24,662.56

We do not have bank access to CWB, as banking was conducted through CWB prior to the acquisition. I believe the missed payment where from Nov, Dec and Jan for an amount of $ 151.012.32. The total outstanding to-date is $ 227,025.20, as NBC has not taken any funds out of the account.

There is $ 119,059.07 in the account, as NBC has not been withdrawing any mortgage payments. And another $ 108,000 will be deposit by tomorrow to clear our past due.

I would like to clear our mortgage account, please advise. Hopefully, this will clear all out outstanding payables to NBC for Goshu Products/Services Inc.

Thank you,

Kavinder Dhillon (he, him), P.L.Eng.
LabTest Certification
T: 604-247-0444 Ext. 101 | M: 604-805-2016 | 1-855-346-0444
Head Office: 205 – 8291 92 Street, Delta, BC, V4G 0A4, Canada
Toronto: 2520 Bristol Circle, Oakville, ON, L6H 5S1, Canada
Las Vegas: 5977 McLeod Drive, Las Vegas, NV, 89120, USA
Richmond: 3128 – 20800 Westminster Hwy., Richmond, BC, V6V 2W3, Canada
Dallas: 2363 Merritt Dr., Ste. 100, Garland, TX, 75041, USA

www.labtestcert.com | kdhillon@labtestcert.com

VANCOUVER | RICHMOND | TORONTO | LAS VEGAS | DALLAS

Please consider the environment before printing this e-mail.

This is **Exhibit "G"** referred to in the Affidavit of Jennifer Alambre made before me at Vancouver, BC, this 10th day of September, 2026.

A Commissioner for the taking of Affidavits for *British Columbia*

From: Raminder Arora <rpsarora@arorazbar.com>
Sent: Wednesday, September 2, 2026 3:21 PM
To: Roh, Encina
Cc: Lauren Vanderploeg; Rubin, Peter; Satinder Dhaliwal; Ravneet S. Arora; Ravena Kubiaki
Subject: RE: NBC v Labtest/Dhillon - BCSC - S265325

Follow Up Flag: Follow up
Flag Status: Flagged

• External Email | Courrier électronique externe •

Hello Encina,

Thank you for your email.

Our clients wish to bring the Goshu and 248 Ontario accounts up to date by paying all outstanding arrears. I understand that the only contentious item has been the June payment for the Goshu loan. The Respondents are willing to make payment of the amounts as summarized by you below.

The Goshu account balance as of today is **$156,644.90**, which is sufficient to clear arrears with respect to the Goshu Loan. Moving forward, the Goshu account will have sufficient funds before the 23rd of each month to cover the monthly Goshu Loan payments. Please advise when the Bank will withdraw the outstanding arrears amount with respect to the Goshu Loan.

The 248 Ontario account will have sufficient balance as of September 8, 2026 (the next payment date) to cover monthly payments for both August and September, i.e. $59,728.58 x 2 = **$119,457.16**. Please confirm the Bank will be withdrawing this amount from the 248 Ontario account on September 8, 2026.

Before the hearing of the Petition, we intend to file further evidence from the Respondents' solicitor wherein he will outline the steps being taken to complete the sale-purchase transaction and, if possible, will provide an expected timeline for completion. We also intend to file further evidence with updated financial information for the Respondent Companies.

Now that you have the redacted LOI, please advise if the Bank is willing to proceed by way of a Consent Order (rather than a hearing) wherein the Respondents will agree to: (1) staying up to date with their ongoing obligations with respect to the Loans; (2) document disclosure to the Bank and Deloitte within stipulated timelines; and (3) keeping the Bank apprised of the progress with respect to the intended sale of the Business, and the Bank will agree to not seek appointment of a receiver until the end of this year (or at least until December 15, 2026) to allow the Respondents to complete the intended sale purchase transaction which will have the Indebtedness paid in its entirety.

I look forward to your response.

Best,

Raminder Arora
Lawyer
Arora Zbar LLP

Office: (604) 260-6890
Direct: (778) 653-2894

Suite 315
2233 Burrard St
Vancouver, BC V6J 3H9
Surrey Office - By Appointment Only

arorazbar.com

From: Roh, Encina <encina.roh@blakes.com>
Sent: August 26, 2026 9:25 AM
To: Satinder Dhaliwal <sdhaliwal@kswlawyers.ca>
Cc: Aman S. Bindra <ABindra@kswlawyers.ca>; Lauren Vanderploeg <lvanderploeg@kswlawyers.ca>; Rubin, Peter <peter.rubin@blakes.com>; Raminder Arora <rpsarora@arorazbar.com>
Subject: FW: NBC v Labtest/Dhillon - BCSC - S265325

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Satinder,

The Goshu payment of $50,337.44 due on June 23, 2026 was not collected and is outstanding.

As your client is aware, the $227,024.64 made available by Labtest on or about June 26, 2026 was only sufficient to cover the payments up to May 23, 2026. In the email exchange attached above, Kavinder acknowledged that: (a) the November, December and January payments were missed; and (b) the February and March payments, and an interest payment of $24,662.56 were collected. The table below provides the breakdown.

November 23, 2025	$50,337.44
December 23, 2025	$50,337.44
January 23, 2026	$50,337.44
February 23, 2026	$0.00
March 23, 2026	$0.00
April 23, 2026	$50,337.44
May 23, 2026	$50,337.44
Total Payment Outstanding	**$251,687.20**
Interest Collected	-$24,662.56
Remaining Outstanding Payments	**$227,024.64**

Accordingly, the total outstanding amount of arrears is **$210,740.90** (given that the June 23, 2026 Goshu payment was not made).

Thanks,

Encina Roh (she, her, hers)
Associate
encina.roh@blakes.com
T. +1-604-631-4254

From: Satinder Dhaliwal <sdhaliwal@kswlawyers.ca>
Sent: Tuesday, August 25, 2026 4:09 PM
To: Roh, Encina <encina.roh@blakes.com>

Cc: Aman S. Bindra <ABindra@kswlawyers.ca>; Lauren Vanderploeg <lvanderploeg@kswlawyers.ca>; Rubin, Peter <peter.rubin@blakes.com>; Raminder Arora <rpsarora@arorazbar.com>
Subject: RE: NBC v Labtest/Dhillon - BCSC - S265325

• External Email | Courrier électronique externe •

Hi Encina,

We were looking for the NBC arrears balance – thanks for providing.

On review, our client advises that the June 23rd Goshu payment was made. Accounting for that payment, the arrears outstanding on that account should be $100,674.88, and the total required to bring the accounts current should be $160,403.46. Please kindly confirm with NBC (revised table below).

Our client will be depositing funds into the accounts by end of day tomorrow, so NBC should be able to draw on the accounts tomorrow evening.

2842878 Ontario Inc	
August 8, 2026	$59,728.58
Total 2842878 Ontario Inc	$59,728.58
Goshu Products/Services Inc	
~~June 23, 2026~~	~~$50,337.44~~
July 23, 2026	$50,337.44
August 23, 2026	$50,337.44
Total Goshu Products/Services Inc	$100,674.88
Total	**$160,403.46**

Satinder Dhaliwal
Senior Counsel
Practising as a Law Corporation

604.591.7321 ext: 383
604.591.7149
sdhaliwal@kswlawyers.ca

KSW Lawyers #220-7565 132nd Street, Surrey, BC, V3W 1K5

From: Roh, Encina <encina.roh@blakes.com>
Sent: Tuesday, August 25, 2026 11:57 AM
To: Satinder Dhaliwal <sdhaliwal@kswlawyers.ca>
Cc: Aman S. Bindra <ABindra@kswlawyers.ca>; Lauren Vanderploeg <lvanderploeg@kswlawyers.ca>; Rubin, Peter <peter.rubin@blakes.com>; Raminder Arora <rpsarora@arorazbar.com>
Subject: FW: NBC v Labtest/Dhillon - BCSC - S265325

Hello Satinder,

This is **Exhibit "H"** referred to in the Affidavit of Jennifer Alambre made before me at Vancouver, BC, this 10th day of September, 2026.

A Commissioner for the taking of Affidavits for *British Columbia*

Assessment Roll Report

Disclaimer

This information is obtained from various sources and is determined as of the specific dates set out in the Assessment Act. As a result, BC Assessment cannot warrant that it is current or accurate, and provides it for your convenience only. Use of this information without verification from original sources is at your own risk.

Report Date:	Sep 02, 2026	**Report Time:**	09:14:35 AM
Folio:	30237/492	**For:**	PS31895
Roll Year:	2026	**Roll Number:**	D-344-257-03-0
Area:	11	**Jurisdiction:**	306
School District:	37		
Neighbourhood:	030 - Commercial / Industrial Strata		
Property Address:	#204 8291 92 ST DELTA BC V4G 0A4		
Owner Name:	GOSHU PRODUCTS/SERVICES INC	**# of Owners:**	1
Owner Address:	205-8291 92 ST DELTA BC V4G 0A4		
Document No:	CA4968715		
PID:	029-205-514		
Legal Description:	STRATA LOT 3, PLAN EPS1707, DISTRICT LOT 132, GROUP 2, NEW WESTMINSTER LAND DISTRICT, TOGETHER WITH AN INTEREST IN THE COMMON PROPERTY IN PROPORTION TO THE UNIT ENTITLEMENT OF THE STRATA LOT AS SHOWN ON FORM V		

2026 Value

Property Class	Land	Improvement
Business And Other	$1592000	$382000

Total Actual Value: $1974000

2025 Value

Property Class	Land	Improvement
Business And Other	$1669000	$401000

Total Actual Value: $2070000

2024 Value

Property Class	Land	Improvement
Business And Other	$1571000	$377000

Total Actual Value: $1948000

Manual Class: C453 - Industrial Flex Building
Actual Use: 216 - Commercial Strata-Lot
Tenure: 01 - Crown-Granted
ALR:
Land Dimension: **Land Dimension Type:**

Sales:

Number	Description
#1	A SINGLE PROPERTY, IMPROVED SALE occurred on 03 Feb 2016. This was a CASH sale and the price was 593,488. The document # was CA4968715.
#2	A NON-SALE occurred on 06 Nov 2013. The document # was CA3444736.

Additional Owners:

No Additional Owners

Associated PIDs:

Assessment Roll Report

Disclaimer

This information is obtained from various sources and is determined as of the specific dates set out in the Assessment Act. As a result, BC Assessment cannot warrant that it is current or accurate, and provides it for your convenience only. Use of this information without verification from original sources is at your own risk.

Report Date:	Sep 02, 2026	**Report Time:**	09:13:02 AM
Folio:	30237/492	**For:**	PS31895
Roll Year:	2026	**Roll Number:**	D-344-257-04-0
Area:	11	**Jurisdiction:**	306
School District:	37		
Neighbourhood:	030 - Commercial / Industrial Strata		
Property Address:	#205 8291 92 ST DELTA BC V4G 0A4		
Owner Name:	GOSHU PRODUCTS/SERVICES INC	**# of Owners:**	1
Owner Address:	205-8291 92 ST DELTA BC V4G 0A4		
Document No:	CA3718218		
PID:	029-205-522		
Legal Description:	STRATA LOT 4, PLAN EPS1707, DISTRICT LOT 132, GROUP 2, NEW WESTMINSTER LAND DISTRICT, TOGETHER WITH AN INTEREST IN THE COMMON PROPERTY IN PROPORTION TO THE UNIT ENTITLEMENT OF THE STRATA LOT AS SHOWN ON FORM V		

2026 Value

Property Class	Land	Improvement
Business And Other	$1625000	$386000

Total Actual Value: $2011000

2025 Value

Property Class	Land	Improvement
Business And Other	$1703000	$405000

Total Actual Value: $2108000

2024 Value

Property Class	Land	Improvement
Business And Other	$1603000	$381000

Total Actual Value: $1984000

Manual Class: C453 - Industrial Flex Building
Actual Use: 216 - Commercial Strata-Lot
Tenure: 01 - Crown-Granted
ALR:
Land Dimension: **Land Dimension Type:**

Sales:

Number	Description
#1	A MULTIPLE PROPERTY, IMPROVED SALE occurred on 09 May 2014. This was a CASH sale and the price was 1,195,000. The document # was CA3718218.
#2	A NON-SALE occurred on 06 Nov 2013. The document # was CA3444737.

Additional Owners:

No Additional Owners

Associated PIDs:

Assessment Roll Report

Disclaimer

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Report Date:	Sep 02, 2026	**Report Time:**	09:13:52 AM
Folio:	30237/492	**For:**	PS31895
Roll Year:	2026	**Roll Number:**	D-344-257-05-0
Area:	11	**Jurisdiction:**	306
School District:	37		
Neighbourhood:	030 - Commercial / Industrial Strata		
Property Address:	#206 8291 92 ST DELTA BC V4G 0A4		
Owner Name:	GOSHU PRODUCTS/SERVICES INC	**# of Owners:**	1
Owner Address:	205-8291 92 ST DELTA BC V4G 0A4		
Document No:	CA3718219		
PID:	029-205-531		
Legal Description:	STRATA LOT 5, PLAN EPS1707, DISTRICT LOT 132, GROUP 2, NEW WESTMINSTER LAND DISTRICT, TOGETHER WITH AN INTEREST IN THE COMMON PROPERTY IN PROPORTION TO THE UNIT ENTITLEMENT OF THE STRATA LOT AS SHOWN ON FORM V		

2026 Value

Property Class	Land	Improvement
Business And Other	$1634000	$391000

Total Actual Value: $2025000

2025 Value

Property Class	Land	Improvement
Business And Other	$1713000	$410000

Total Actual Value: $2123000

2024 Value

Property Class	Land	Improvement
Business And Other	$1613000	$386000

Total Actual Value: $1999000

Manual Class: C453 - Industrial Flex Building
Actual Use: 216 - Commercial Strata-Lot
Tenure: 01 - Crown-Granted
ALR:
Land Dimension: **Land Dimension Type:**

Sales:

Number	Description
#1	A NON-SALE occurred on 09 May 2014. The document # was CA3718219.
#2	A NON-SALE occurred on 06 Nov 2013. The document # was CA3444738.

Additional Owners:

No Additional Owners

Associated PIDs:

Assessment Roll Report

Disclaimer

Report Date:	Sep 02, 2026	**Report Time:**	09:11:28 AM
Folio:	30237/492	**For:**	PS31895
Roll Year:	2026	**Roll Number:**	R-005-103-051
Area:	11	**Jurisdiction:**	320

School District: 38
Neighbourhood: 030 - Commercial / Industrial Strata
Property Address: #3128 20800 WESTMINSTER HWY RICHMOND BC V6V 2W3

Owner Name: GOSHU PRODUCTS/SERVICES INC   **# of Owners:** 1
Owner Address: 205-8291 92 ST DELTA BC V4G 0A4

Document No: CA1545882
PID: 023-197-234
Legal Description: STRATA LOT 51, BLOCK 4N, PLAN LMS2129, SECTION 9, RANGE 4W, NEW WESTMINSTER LAND DISTRICT, TOGETHER WITH AN INTEREST IN THE COMMON PROPERTY IN PROPORTION TO THE UNIT ENTITLEMENT OF THE STRATA LOT AS SHOWN ON FORM 1 OR V, AS APPROPRIATE

2026 Value

Property Class	Land	Improvement
Business And Other	$920000	$240000

Total Actual Value: $1160000

2025 Value

Property Class	Land	Improvement
Business And Other	$919000	$239000

Total Actual Value: $1158000

2024 Value

Property Class	Land	Improvement
Business And Other	$919000	$239000

Total Actual Value: $1158000

Manual Class: C709 - Strata Warehouse
Actual Use: 216 - Commercial Strata-Lot
Tenure: 01 - Crown-Granted
ALR:
Land Dimension: **Land Dimension Type:**

Sales:	Number	Description
	#1	A SINGLE PROPERTY, IMPROVED SALE occurred on 30 Apr 2010. This was a CASH sale and the price was 340,000. The document # was CA1545882.

#2 A SINGLE PROPERTY, IMPROVED SALE occurred on 05 May 2003. This was a CASH sale and the price was 189,750. The document # was BV160110.

#3 A NON-SALE occurred on 14 Sep 1995. The document # was BJ276993.

Additional Owners:

No Additional Owners

Associated PIDs:

This is **Exhibit "I"** referred to in the Affidavit of Jennifer Alambre made before me at Vancouver, BC, this 10th day of September, 2026.

A Commissioner for the taking of Affidavits for *British Columbia*

propertyline by mpac

Assessment Roll Report

Property Address	2520-2528 BRISTOL CIR
Municipality	OAKVILLE TOWN
Roll Number	240101001002637
Property Code & Description	520 - Standard industrial properties not specifically identified by other industrial Property Codes

Legal Description	PLAN M492 PT BLK 2 RP 20R9192 PARTS 7/8 & 63/64

Phased-In Assessment**	$3,190,000

Realty Tax Class (RTC)	Realty Tax Qualifier (RTQ)	Realty Portion
I - Industrial	T - Taxable: Full	$1,787,600
C - Commercial	T - Taxable: Full	$1,402,400

Tenant Tax Liability (TTL)	-
Unit Class	
Frontage (ft)	-
Depth (ft)	-
Site Area (A)	1.54