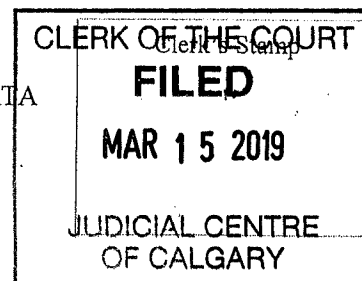


COURT FILE NUMBER 1901-03824
COURT COURT OF QUEEN'S BENCH OF ALBERTA
 IN BANKRUPTCY AND INSOLVENCY
JUDICIAL CENTRE Calgary
PLANTIFF ROYAL BANK OF CANADA
DEFENDANTS SURFACE PRO SERVICES INC., ATKINS
 KUNTZ CONSTRUCTION GROUP INC.,
 2049829 ALBERTA INC., DOUGLAS
 ATKINS, DAVID KUNTZ and ROGER
 LEADER
DOCUMENT SUPPLEMENTAL AFFIDAVIT



ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT Robyn Gurofsky
 Borden Ladner Gervais LLP
 1900, 520 3rd Ave. S.W.
 Calgary, AB T2P 0R3
 Telephone: (403) 232-9774
 Facsimile: (403) 266-1395
 Email: rgurofsky@blg.com
 File No. 404600.000764

AFFIDAVIT OF JOSH COONAN

Sworn on March 15, 2019

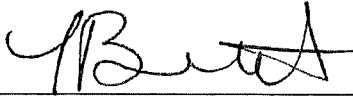
I, Josh Coonan, of Calgary, Alberta, SWEAR AND SAY THAT:

1. I am a manager of Special Loans and Advisory Services for the Plaintiff, the Royal Bank of Canada ("RBC" or the "Bank"), and am presently responsible for the administration of the within accounts. As such, I have personal knowledge of the matters and facts hereinafter sworn to, except where stated to be based on information and belief, and where so stated, I verily believe the same to be true.

2. I make this Affidavit as a supplement to the Affidavit I swore in these proceedings on March 12, 2019 for the purposes of showing a more recent summary of the accounts of the Defendants held at the Bank.
3. Attached hereto and marked as **Exhibit "A"** to this my Affidavit, is an Account Information pulled from RBC's system, summarizing the status of Surface Pro Services Inc.'s ("SPS") accounts as of March 14, 2019 as follows:
 - (a) Chequing account is in overdraft by \$1,776.77;
 - (b) Credit Card account has a balance of \$140,995.01 (limit is \$100,000);
 - (c) Revolving Credit Line has a balance of \$235,275.25 (limit is \$250,000); and
 - (d) Demand Loan which matures March 19, 2019 has a balance of \$1,717.97.
4. Attached hereto and marked as **Exhibit "B"** to this my Affidavit, is an Account Information pulled from RBC's system, summarizing the status of Atkins Kuntz Construction Group Inc.'s ("AKC") accounts as of March 14, 2019 as follows:
 - (a) Chequing account is in overdraft by \$27,564.85;
 - (b) Credit Card account has a balance of \$26,227.99 (limit is \$25,000);
 - (c) Credit Card account has a balance of \$26,256.36 (limit is \$25,000); and
 - (d) Revolving Credit Line has a balance of \$458,998.52 (limit is \$350,000).
5. Attached hereto and marked as **Exhibit "C"** to this my Affidavit, is an Account Information pulled from RBC's system, summarizing the status of 2049829 Alberta Inc.'s accounts as of March 14, 2019 as follows:
 - (a) Chequing account has a balance of \$6,068.22; and
 - (b) Demand mortgage has a balance of \$2,252,0645.78.

6. In addition, a total of 15 cheques which I believe were issued as payroll cheques for the March 1, 2019 SPS and/or AKC payroll, were returned as N.S.F. as there were insufficient funds to cover them.
7. I make this Affidavit in further support of RBC's application for the appointment of an interim receiver over the corporate defendants and for no improper purpose.

SWORN BEFORE ME at Calgary, Alberta,
this 15th day of March, 2019.



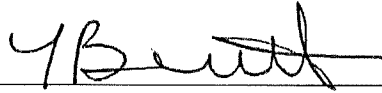
Commissioner for Oaths in and for Alberta

TIFFANY BENNETT
A Commissioner for Oaths
in and for Alberta
Student-At-Law, Notary Public



JOSH COONAN

This is Exhibit "A" referred to
in the Affidavit of Josh Coonan
Sworn before me this 15 day of March, 2019



Commissioner for Oaths
In and for the Province of Alberta

TIFFANY BENNETT
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Student-At-Law, Notary Public



Account Information

March 14, 2019

SURFACE PRO SERVICES INC.

Assets**Total Assets: -\$1,776.77**

Chequing / Savings	Ownership	Overdraft Limit	Balance
C/A/REG - [REDACTED]	Sole Owner	0	-1,776.77
Total:			-\$1,776.77

Investments	Ownership	Maturity Date	Balance
GIC - [REDACTED]	Sole Owner		0.00
Total:			\$0.00

Liabilities**Total Liabilities: \$377,988.23**

Credit Cards	Ownership	Limit	Balance
[REDACTED]	Joint or	50,000	0.00
[REDACTED]	Joint or	50,000	140,995.01
Total:			\$140,995.01

Loans / Mortgages	Ownership	Insurance Protection			Maturity Date	Balance
		Life	Critical Illness	Disability		
RCL - [REDACTED]	Sole Owner	Ineligible	Not Offered	Call ISC		235,275.25
DEMAND - [REDACTED]	Sole Owner	Ineligible	Not Offered	Call ISC	Mar 19, 2019	1,717.97
Total:						\$236,993.22

Additional Services

Account Type	Ownership	Balance
RFA - 03009 8726812	Sole Owner	0.00
PDS C - 0855901184790000	Sole Owner	0.00
ACR - 00006 135003085 001	Sole Owner	236,281.26
ACR - 00006 135003085 002	Sole Owner	140,995.01
ACR - 00006 135003085 003	Sole Owner	1,703.43

Account Type	Ownership	Balance
ACR - 00006 135003085 004	Sole Owner	279,524.15
ACR - 00006 135003085 005	Sole Owner	0.00
ACR - 00006 135003085 006	Sole Owner	0.00
ACR - 00006 135003085 007	Sole Owner	0.00

Please Note:**Royal Mutual Funds**

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RBC Direct Investing

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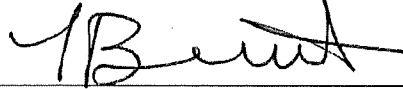
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This is Exhibit "B" referred to
in the Affidavit of Josh Coonan
Sworn before me this 15 day of March, 2019

A handwritten signature in black ink, appearing to read 'T Bennett', written over a horizontal line.

Commissioner for Oaths
In and for the Province of Alberta

TIFFANY BENNETT
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in and for Alberta
Student-At-Law, Notary Public



Account Information

March 14, 2019

ATKINS KUNTZ CONSTRUCTION GROU
Assets**Total Assets: -\$27,564.85**

Chequing / Savings	Ownership	Overdraft Limit	Balance
C/A/REG - [REDACTED]	Sole Owner	0	-27,564.85
Total:			-\$27,564.85

Investments	Ownership	Maturity Date	Balance
There are no items to be displayed.			

Liabilities**Total Liabilities: \$511,482.87**

Credit Cards	Ownership	Limit	Balance
[REDACTED]	Joint or	25,000	26,227.99
[REDACTED]	Joint or	25,000	26,256.36
Total:			\$52,484.35

Loans / Mortgages	Ownership	Insurance Protection			Maturity Date	Balance
		Life	Critical Illness	Disability		
RCL - [REDACTED] [REDACTED]	Sole Owner	Ineligible	Not Offered	Call ISC	458,998.52	
Total:					\$458,998.52	

Additional Services

Account Type	Ownership	Balance
RFA - 03009 8696379	Sole Owner	0.00
PDS C - 0855903773590000	Sole Owner	0.00
ACR - 00006 142448653 001	Sole Owner	482,564.85
ACR - 00006 142448653 002	Sole Owner	0.00
ACR - 00006 142448653 003	Sole Owner	52,484.35
ACR - 00006 142448653 004	Sole Owner	0.00
ACR - 00006 142448653 005	Sole Owner	0.00
ACR - 00006 142448653 006	Sole Owner	0.00

Account Type**Ownership****Balance****Please Note:****Royal Mutual Funds**

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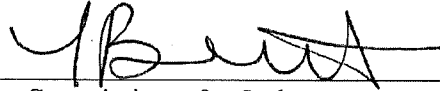
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Sworn before me this 15 day of March, 2019

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Commissioner for Oaths
In and for the Province of Alberta

TIFFANY BENNETT
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Student-At-Law, Notary Public



Account Information

March 14, 2019

2049829 ALBERTA INC.

Assets**Total Assets: \$6,068.22**

Chequing / Savings	Ownership	Overdraft Limit	Balance
C/A/REG - [REDACTED]	Sole Owner	0	6,068.22
Total:			\$6,068.22

Investments	Ownership	Maturity Date	Balance
There are no items to be displayed.			

Liabilities**Total Liabilities: \$2,252,065.78**

Credit Cards	Ownership	Limit	Balance
There are no items to be displayed.			

Loans / Mortgages	Ownership	Insurance Protection			Maturity Date	Balance
		Life	Critical Illness	Disability		
DEMAND - [REDACTED]	Sole Owner	Ineligible	Ineligible	Call ISC	Jan 15, 2023	2,252,065.78
Total:						\$2,252,065.78

Additional Services

Account Type	Ownership	Balance
ACR - 00006 576016703 001	Sole Owner	2,243,204.81

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