



This is the 1st Affidavit  
of N. Sidhu in this case and  
was made on 18/MAR/2026

NO. SE261982  
VANCOUVER REGISTRY

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

BETWEEN:

ROYAL BANK OF CANADA

PLAINTIFF

AND:

MAVERICK ESTATE WINERY INC.  
MAVERICK VINEYARDS INC.  
JAN NELSON  
THOMAS ANDREW WINDSOR

DEFENDANTS

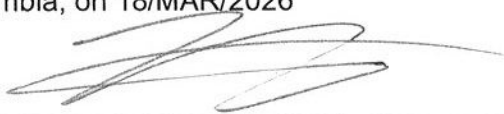
**AFFIDAVIT**

I, **NAVNEET SIDHU**, Legal Assistant, of 20<sup>th</sup> Floor, 250 Howe Street, Vancouver, British Columbia, SWEAR THAT:

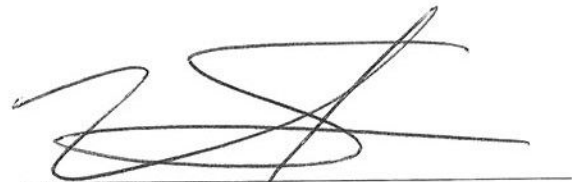
1. I am employed by the law firm of Dentons Canada LLP ("**Dentons**"), solicitors for Royal Bank of Canada, and as such have personal knowledge of the facts and matters hereinafter deposed to save and except where stated to be based on information and belief and where so stated, I verily believe the same to be true.
2. Attached and marked as **Exhibit "A"** to my affidavit is a true copy of the BC Company Search for Maverick Estate Winery Inc. ("**Maverick Estate**") dated September 8, 2025.
3. Attached and marked as **Exhibit "B"** to my affidavit is a true copy of the BC Company Search for Maverick Vineyards Inc. ("**Maverick Vineyards**") dated September 8, 2025.
4. Attached and marked as **Exhibit "C"** to my affidavit is a true copy of the BC PPR search results in respect of Maverick Estate dated September 8, 2025.
5. Attached and marked as **Exhibit "D"** to my affidavit is a true copy of the BC PPR search results in respect of Maverick Vineyards dated September 8, 2025.

6. Attached and marked as **Exhibit "E"** to my affidavit is a true copy of the demand letter to Maverick Estate from Dentons dated January 27, 2026.
7. Attached and marked as **Exhibit "F"** to my affidavit is a true copy of the demand letter to Maverick Vineyards from Dentons dated January 27, 2026.
8. Our office has not received payment in response to the foregoing demand letters.
9. Now shown to me and attached hereto as **Exhibit "G"** is a copy of a consent to act as receiver and manager, duly executed by KSV Restructuring Inc..

SWORN before me in Vancouver, British  
Columbia, on 18/MAR/2026



A Commissioner for taking Affidavits  
for British Columbia



**NAVNEET SIDHU**

NICHOLAS TSANG  
*Barrister & Solicitor*  
DENTONS CANADA LLP  
20th Floor, 250 Howe Street  
Vancouver, B.C. V6C 3R8  
Telephone (604) 687-4460

This is **Exhibit "A"** referred to in the affidavit of Navneet Sidhu sworn before me at **Vancouver, BC** this 18th day of March, 2026.



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A Commissioner for taking Affidavits  
For **British Columbia**



## BC Company Summary

For  
**MAVERICK ESTATE WINERY INC.**

**Date and Time of Search:** September 08, 2025 12:42 PM Pacific Time  
**Currency Date:** July 24, 2025

### ACTIVE

**Incorporation Number:** BC1248454  
**Name of Company:** MAVERICK ESTATE WINERY INC.  
**Business Number:** 821567385 BC0002  
**Recognition Date and Time:** April 27, 2020 04:41 PM Pacific Time as a result of an Amalgamation  
**Last Annual Report Filed:** April 27, 2024  
**In Liquidation:** No  
**Receiver:** No

### AMALGAMATING CORPORATION(S) INFORMATION

Name of Amalgamating Corporation	Incorporation Number in BC
1247671 B.C. LTD.	BC1247671
MAVERICK ESTATE WINERY INC.	BC1021099

### REGISTERED OFFICE INFORMATION

Mailing Address:	Delivery Address:
C/O PUSHOR MITCHELL LLP 301 - 1665 ELLIS STREET KELOWNA BC V1Y 2B3 CANADA	C/O PUSHOR MITCHELL LLP 301 - 1665 ELLIS STREET KELOWNA BC V1Y 2B3 CANADA

### RECORDS OFFICE INFORMATION

Mailing Address:	Delivery Address:
C/O PUSHOR MITCHELL LLP 301 - 1665 ELLIS STREET KELOWNA BC V1Y 2B3 CANADA	C/O PUSHOR MITCHELL LLP 301 - 1665 ELLIS STREET KELOWNA BC V1Y 2B3 CANADA

### DIRECTOR INFORMATION

**Last Name, First Name, Middle Name:**

Lalor, Louise

**Mailing Address:**113 LOMBARDY HEIGHTS  
OKANAGAN FALLS BC V0H 1R3  
CANADA**Delivery Address:**113 LOMBARDY HEIGHTS  
OKANAGAN FALLS BC V0H 1R3  
CANADA**Last Name, First Name, Middle Name:**

Nelson, Jan Elliott

**Mailing Address:**105 - 115 SYDNEY STREET  
PENTICTON BC V2A 9G3  
CANADA**Delivery Address:**105 - 115 SYDNEY STREET  
PENTICTON BC V2A 9G3  
CANADA**Last Name, First Name, Middle Name:**

Shaunessy, Robert

**Mailing Address:**201, 137 - 26TH AVENUE SW  
CALGARY AB T2S 0M2  
CANADA**Delivery Address:**201, 137 - 26TH AVENUE SW  
CALGARY AB T2S 0M2  
CANADA**Last Name, First Name, Middle Name:**

Shaunessy, Barbara

**Mailing Address:**201, 137 - 26TH AVENUE SW  
CALGARY AB T2S 0M2  
CANADA**Delivery Address:**201, 137 - 26TH AVENUE SW  
CALGARY AB T2S 0M2  
CANADA**Last Name, First Name, Middle Name:**

Windsor, Thomas Andrew


**Mailing Address:**3835 SAGE MESA DRIVE  
PENTICTON BC V2A 9A2  
CANADA**Delivery Address:**3835 SAGE MESA DRIVE  
PENTICTON BC V2A 9A2  
CANADA

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NO OFFICER INFORMATION FILED AS AT April 27, 2024.

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This is **Exhibit "B"** referred to in the affidavit of Navneet Sidhu sworn before me at **Vancouver, BC** this 18th day of March, 2026.



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A Commissioner for taking Affidavits  
For **British Columbia**



BC Registry  
Services

Mailing Address:  
PO Box 9431 Stn Prov Govt  
Victoria BC V8W 9V3  
www.corporateonline.gov.bc.ca

Location:  
2nd Floor - 940 Blanshard Street  
Victoria BC  
1 877 526-1526

## BC Company Summary

For  
**MAVERICK VINEYARDS INC.**

**Date and Time of Search:** September 08, 2025 12:46 PM Pacific Time  
**Currency Date:** July 24, 2025

### ACTIVE

**Incorporation Number:** BC1246139  
**Name of Company:** MAVERICK VINEYARDS INC.  
**Business Number:** 739220531 BC0001  
**Recognition Date and Time:** Incorporated on April 01, 2020 01:20 PM Pacific Time **In Liquidation:** No  
**Last Annual Report Filed:** April 01, 2024 **Receiver:** No

### REGISTERED OFFICE INFORMATION

**Mailing Address:**

C/O PUSHOR MITCHELL LLP  
301 - 1665 ELLIS STREET  
KELOWNA BC V1Y 2B3  
CANADA

**Delivery Address:**

C/O PUSHOR MITCHELL LLP  
301 - 1665 ELLIS STREET  
KELOWNA BC V1Y 2B3  
CANADA

### RECORDS OFFICE INFORMATION

**Mailing Address:**

C/O PUSHOR MITCHELL LLP  
301 - 1665 ELLIS STREET  
KELOWNA BC V1Y 2B3  
CANADA

**Delivery Address:**

C/O PUSHOR MITCHELL LLP  
301 - 1665 ELLIS STREET  
KELOWNA BC V1Y 2B3  
CANADA

### DIRECTOR INFORMATION

**Last Name, First Name, Middle Name:**

Lalor, Louise

**Mailing Address:**

113 LOMBARDY HEIGHTS  
OKANAGAN FALLS BC V0H 1R3  
CANADA

**Delivery Address:**

113 LOMBARDY HEIGHTS  
OKANAGAN FALLS BC V0H 1R3  
CANADA

**Last Name, First Name, Middle Name:**

Nelson, Jan Elliott

**Mailing Address:**105 - 115 SYDNEY STREET  
PENTICTON BC V2A 9G3  
CANADA**Delivery Address:**105 - 115 SYDNEY STREET  
PENTICTON BC V2A 9G3  
CANADA**Last Name, First Name, Middle Name:**

Shaunessy, Barbara

**Mailing Address:**201, 137 - 26TH AVENUE SW  
CALGARY AB T2S 0M2  
CANADA**Delivery Address:**201, 137 - 26TH AVENUE SW  
CALGARY AB T2S 0M2  
CANADA**Last Name, First Name, Middle Name:**

Shaunessy, Robert

**Mailing Address:**201, 137 - 26TH AVENUE SW  
CALGARY AB T2S 0M2  
CANADA**Delivery Address:**201, 137 - 26TH AVENUE SW  
CALGARY AB T2S 0M2  
CANADA**Last Name, First Name, Middle Name:**

Windsor, Thomas Andrew

**Mailing Address:**3835 SAGE MESA DRIVE  
PENTICTON BC V2A 9A2  
CANADA**Delivery Address:**3835 SAGE MESA DRIVE  
PENTICTON BC V2A 9A2  
CANADA**OFFICER INFORMATION AS AT April 01, 2024****Last Name, First Name, Middle Name:**

Nelson, Jan Elliott

**Office(s) Held:** (CEO)**Mailing Address:**105 - 115 SYDNEY STREET  
PENTICTON BC V2A 9G3  
CANADA**Delivery Address:**105 - 115 SYDNEY STREET  
PENTICTON BC V2A 9G3  
CANADA**Last Name, First Name, Middle Name:**

Windsor, Thomas Andrew

**Office(s) Held:** (Other Office(s))**Mailing Address:**3835 SAGE MESA DRIVE  
PENTICTON BC V2A 9A2  
CANADA**Delivery Address:**3835 SAGE MESA DRIVE  
PENTICTON BC V2A 9A2  
CANADA

This is **Exhibit "C"** referred to in the affidavit of Navneet Sidhu sworn before me at **Vancouver, BC** this 18th day of March, 2026.



\_\_\_\_\_  
A Commissioner for taking Affidavits  
For **British Columbia**



PERSONAL PROPERTY REGISTRY SEARCH RESULT
BC Registries and Online Services

Business Debtor - "MAVERICK ESTATE WINERY INC."

Search Date and Time: September 8, 2025 at 10:55:01 am Pacific time
Account Name: DENTONS CANADA LLP
Folio Number: 506954-849

TABLE OF CONTENTS

6 Matches in 5 Registrations in Report

Exact Matches: 4 (\*)

Total Search Report Pages: 13

Table with 4 columns: Base Registration, Base Registration Date, Debtor Name, Page. Contains 5 rows of registration data for MAVERICK ESTATE WINERY INC.

**Base Registration Number: 170485M**

**Registration Description:** PPSA SECURITY AGREEMENT  
**Act:** PERSONAL PROPERTY SECURITY ACT  
**Base Registration Date and Time:** April 15, 2020 at 4:26:13 pm Pacific time  
**Current Expiry Date and Time:** April 15, 2030 at 11:59:59 pm Pacific time  
Expiry date includes subsequent registered renewal(s)  
**Trust Indenture:** No

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**CURRENT REGISTRATION INFORMATION**

(as of September 8, 2025 at 10:55:01 am Pacific time)

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**Secured Party Information**

**ROYAL BANK OF CANADA**

**Address**

36 YORK MILLS ROAD, 4TH FLOOR  
TORONTO ON  
M2P 0A4 Canada

**Debtor Information**

**MAVERICK ESTATE WINERY INC.**

**Address**

3974 HIGHWAY 97  
OLIVER BC  
V0H 1T1 Canada

**MAVERICK ESTATE WINERY INC.  
(INC. NO. BC1248454)**

**Address**

3974 HIGHWAY 97  
OLIVER BC  
V0H 1T1 Canada

**Vehicle Collateral**

None



## PERSONAL PROPERTY REGISTRY SEARCH RESULT

BC Registries and Online Services

### General Collateral

#### Base Registration General Collateral:

ALL OF THE DEBTOR'S PRESENT AND AFTER-ACQUIRED PERSONAL PROPERTY WHEREVER SITUATE INCLUDING BUT NOT LIMITED TO GOODS (INCLUDING INVENTORY, EQUIPMENT (EQUIPMENT INCLUDES, WITHOUT LIMITATION, MACHINERY, TOOLS, APPARATUS, PLANTS, FURNITURE, FIXTURES, AIRCRAFT AND VEHICLES OF WHATSOEVER NATURE AND KIND), BUT EXCLUDING CONSUMER GOODS) CHATTEL PAPER, DOCUMENTS OF TITLE, INSTRUMENTS, INTANGIBLES, MONEY, LICENCES, CROPS, SECURITIES AND OTHER INVESTMENT PROPERTY.

### Original Registering Party

**ROYAL BANK OF CANADA**

#### Address

36 YORK MILLS ROAD, 4TH FLOOR  
TORONTO ON  
M2P 0A4 Canada

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**HISTORY**

(Showing most recent first)

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**RENEWAL**

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**Registration Date and Time:** March 21, 2025 at 7:58:28 am Pacific time  
**Registration Number:** 118203R  
**Registration Life:** 5 Years  
**New Expiration Date and Time:** April 15, 2030 at 11:59:59 pm Pacific time

**Registering Party Information**

**D + H LIMITED PARTNERSHIP**

**Address**

2 ROBERT SPECK PARKWAY, 15TH FLOOR  
MISSISSAUGA ON  
L4Z 1H8 Canada

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**AMENDMENT**

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**Registration Date and Time:** May 27, 2020 at 1:47:30 pm Pacific time  
**Registration Number:** 240328M  
**Description:** TO REFLECT THE AMALGAMATION OF 1247671 B.C. LTD. (INC. NO. BC1247671) AND MAVERICK ESTATE WINERY INC. (INC. NO. BC1021099) TO FORM A NEW COMPANY UNDER THE NAME OF MAVERICK ESTATE WINERY INC. (INC. NO. BC1248454).

**Debtor Information**

**MAVERICK ESTATE WINERY INC.**  
**(INC. NO. BC1248454)**

ADDED

**Address**

3974 HIGHWAY 97  
OLIVER BC  
V0H 1T1 Canada

**Registering Party Information**

**MCMILLAN DUBO LAW GROUP**

**Address**

320 - 301 VICTORIA STREET  
KAMLOOPS BC  
V2C 2A3 Canada

## PERSONAL PROPERTY REGISTRY SEARCH RESULT

BC Registries and Online Services

**Base Registration Number: 182258M**

**Registration Description:** PPSA SECURITY AGREEMENT  
**Act:** PERSONAL PROPERTY SECURITY ACT  
**Base Registration Date and Time:** April 23, 2020 at 1:57:50 pm Pacific time  
**Current Expiry Date and Time:** April 23, 2030 at 11:59:59 pm Pacific time  
Expiry date includes subsequent registered renewal(s)  
**Trust Indenture:** No

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### CURRENT REGISTRATION INFORMATION

(as of September 8, 2025 at 10:55:01 am Pacific time)

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#### Secured Party Information

**ROYAL BANK OF CANADA**

**Address**

36 YORK MILLS ROAD, 4TH FLOOR  
TORONTO ON  
M2P 0A4 Canada

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#### Debtor Information

**1247671 B.C. LTD.**

**Address**

3974 HIGHWAY 97  
OLIVER BC  
V0H 1T1 Canada

**MAVERICK ESTATE WINERY INC.  
(INC. NO. BC1248454)**

**Address**

3974 HIGHWAY 97  
OLIVER BC  
V0H 1T1 Canada

---

#### Vehicle Collateral

None

## PERSONAL PROPERTY REGISTRY SEARCH RESULT

BC Registries and Online Services

### General Collateral

#### Base Registration General Collateral:

ALL OF THE DEBTOR'S PRESENT AND AFTER-ACQUIRED PERSONAL PROPERTY WHEREVER SITUATE INCLUDING BUT NOT LIMITED TO GOODS INCLUDING INVENTORY, EQUIPMENT (EQUIPMENT INCLUDES, WITHOUT LIMITATION, MACHINERY, TOOLS, APPARATUS, PLANTS, FURNITURE, FIXTURES, AIRCRAFT AND VEHICLES OF WHATSOEVER NATURE AND ,KIND, BUT EXCLUDING CONSUMER GOODS), CHATTEL PAPER, DOCUMENTS OF TITLE, INSTRUMENTS, INTANGIBLES, MONEY, LICENCES, CROPS, SECURITIES AND OTHER INVESTMENT PROPERTY.

### Original Registering Party

**MCMILLAN DUBO LAW GROUP**

#### Address

320 - 301 VICTORIA STREET  
KAMLOOPS BC  
V2C 2A3 Canada

**PERSONAL PROPERTY REGISTRY SEARCH RESULT**

BC Registries and Online Services

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**HISTORY**

(Showing most recent first)

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**RENEWAL**

**Registration Date and Time:** April 3, 2025 at 2:28:36 pm Pacific time  
**Registration Number:** 148718R  
**Registration Life:** 5 Years  
**New Expiration Date and Time:** April 23, 2030 at 11:59:59 pm Pacific time

**Registering Party Information****D + H LIMITED PARTNERSHIP****Address**

2 ROBERT SPECK PARKWAY, 15TH FLOOR  
MISSISSAUGA ON  
L4Z 1H8 Canada

---

**AMENDMENT**

**Registration Date and Time:** May 27, 2020 at 1:49:15 pm Pacific time  
**Registration Number:** 240330M  
**Description:** TO REFLECT THE AMALGAMATION OF 1247671 B.C. LTD. (INC. NO. BC1247671) AND MAVERICK ESTATE WINERY INC. (INC. NO. BC1021099) TO FORM A NEW COMPANY UNDER THE NAME OF MAVERICK ESTATE WINERY INC. (INC. NO. BC1248454).

**Debtor Information****MAVERICK ESTATE WINERY INC.  
(INC. NO. BC1248454)**

ADDED

**Address**

3974 HIGHWAY 97  
OLIVER BC  
V0H 1T1 Canada

**Registering Party Information****MCMILLAN DUBO LAW GROUP****Address**

320 - 301 VICTORIA STREET  
KAMLOOPS BC  
V2C 2A3 Canada

## PERSONAL PROPERTY REGISTRY SEARCH RESULT

BC Registries and Online Services

**Base Registration Number: 738912M**

**Registration Description:** PPSA SECURITY AGREEMENT  
**Act:** PERSONAL PROPERTY SECURITY ACT  
**Base Registration Date and Time:** January 29, 2021 at 9:06:30 am Pacific time  
**Current Expiry Date and Time:** January 29, 2031 at 11:59:59 pm Pacific time  
Expiry date includes subsequent registered renewal(s)  
**Trust Indenture:** No

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### CURRENT REGISTRATION INFORMATION

(as of September 8, 2025 at 10:55:01 am Pacific time)

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#### Secured Party Information

**ROYAL BANK OF CANADA**

**Address**

300-5575 NORTH SERVICE RD  
BURLINGTON ON  
L7L 6M1 Canada

#### Debtor Information

**MAVERICK ESTATE WINERY INC.**

**Address**

3974 HIGHWAY 97  
OLIVER BC  
V0H 1T1 Canada

#### Vehicle Collateral

None

## General Collateral

### Base Registration General Collateral:

AS PER MASTER LEASE AGREEMENT DATED JANUARY 15, 2021 TOGETHER WITH ALL INVENTORY AND EQUIPMENT NOW OR HEREAFTER ACQUIRED BY THE DEBTOR AND FINANCED BY THE SECURED PARTY TOGETHER WITH ALL ATTACHMENTS, ACCESSORIES, ACCESSIONS, REPLACEMENTS, SUBSTITUTIONS, ADDITIONS AND IMPROVEMENTS THERETO, AND ALL PROCEEDS IN ANY FORM DERIVED DIRECTLY OR ,INDIRECTLY FROM ANY DEALING WITH THE COLLATERAL OR PROCEEDS THEREOF, AND WITHOUT LIMITATION, MONEY, CHEQUES, DEPOSITS IN DEPOSIT-TAKING INSTITUTIONS, GOODS, ACCOUNTS RECEIVABLE, RENTS OR OTHER PAYMENTS ARISING FROM THE LEASE OF THE COLLATERAL, CHATTEL PAPER, INSTRUMENTS, INTANGIBLES, DOCUMENTS OF TITLE, SECURITIES, AND RIGHTS OF INSURANCE ,PAYMENTS OR ANY OTHER PAYMENTS AS INDEMNITY OR COMPENSATION FOR LOSS OR DAMAGE TO THE COLLATERAL OR PROCEEDS OF THE COLLATERAL.

## Original Registering Party

**(REGISTRY=RECOVERY) TM INC.**

### Address

1551 THE QUEENSWAY  
TORONTO ON  
M8Z 1T8 Canada

**Base Registration Number: 532207N**

**Registration Description:** PPSA SECURITY AGREEMENT  
**Act:** PERSONAL PROPERTY SECURITY ACT  
**Base Registration Date and Time:** February 11, 2022 at 6:22:40 am Pacific time  
**Current Expiry Date and Time:** February 11, 2027 at 11:59:59 pm Pacific time  
Expiry date includes subsequent registered renewal(s)  
**Trust Indenture:** No

---

**CURRENT REGISTRATION INFORMATION**

(as of September 8, 2025 at 10:55:01 am Pacific time)

---

**Secured Party Information**

**ROYAL BANK OF CANADA**

**Address**

36 YORK MILLS ROAD, 4TH FLOOR  
TORONTO ON  
M2P 0A4 Canada

**Debtor Information**

**MAVERICK ESTATE WINERY INC.**

**Address**

3974 HIGHWAY 97  
OLIVER BC  
V0H 1T1 Canada

**Vehicle Collateral**

None

## PERSONAL PROPERTY REGISTRY SEARCH RESULT

BC Registries and Online Services

### General Collateral

#### Base Registration General Collateral:

MONEYS OR AMOUNTS THAT MAY FROM TIME TO TIME BE ON DEPOSIT IN THE NAME OF DEBTOR WITH OR OWED TO DEBTOR BY SECURED PARTY, ROYAL BANK MORTGAGE CORPORATION, THE ROYAL TRUST COMPANY OR ROYAL TRUST CORPORATION OF CANADA OR ANY TWO OR MORE OF THEM, AND IN THE DEBTOR'S RIGHTS IN THOSE MONEYS OR THOSE AMOUNTS. PROCEEDS: ALL PROCEEDS INCLUDING, WITHOUT LIMITATION, GOODS (INCLUDING INVENTORY AND EQUIPMENT (EQUIPMENT INCLUDES, WITHOUT LIMITATION, MACHINERY, TOOLS, APPARATUS, PLANT, FURNITURE, FIXTURES, AIRCRAFT AND VEHICLES OF WHATSOEVER NATURE AND KIND) BUT EXCLUDING CONSUMER GOODS), MONEY, CHATTEL PAPER, DOCUMENTS OF TITLE, INSTRUMENTS AND SECURITIES.

### Original Registering Party

**D + H LIMITED PARTNERSHIP**

#### Address

2 ROBERT SPECK PARKWAY, 15TH FLOOR  
MISSISSAUGA ON  
L4Z 1H8 Canada

**Base Registration Number: 300698Q**

**Registration Description:** PPSA SECURITY AGREEMENT  
**Act:** PERSONAL PROPERTY SECURITY ACT  
**Base Registration Date and Time:** April 9, 2024 at 6:02:49 am Pacific time  
**Current Expiry Date and Time:** April 9, 2029 at 11:59:59 pm Pacific time  
Expiry date includes subsequent registered renewal(s)  
**Trust Indenture:** No

---

**CURRENT REGISTRATION INFORMATION**

(as of September 8, 2025 at 10:55:01 am Pacific time)

---

**Secured Party Information**

**COMMUNITY FUTURES  
DEVELOPMENT CORPORATION OF  
OKANAGAN-SIMILKAMEEN**

**Address**

102-3115 SKAHA LAKE ROAD  
PENTICTON BC  
V2A 6G5 Canada

**Debtor Information**

**MAVERICK ESTATE WINERY INC.**

**Address**

3974 HIGHWAY 97  
OLIVER BC  
V0H 1T1 Canada

**Vehicle Collateral**

None

**PERSONAL PROPERTY REGISTRY SEARCH RESULT**

BC Registries and Online Services

**General Collateral****Base Registration General Collateral:**

A first-priority security interest over all current and after-acquired personal property, including business equipment, inventory, tools, accounts receivable and all other tangible and intangible assets; and a specific security interest in the guarantor's unencumbered specific security described as:

2016 Oscillys 100 Destemmer Serial 11609007 31336

**Original Registering Party**

**COMMUNITY FUTURES  
DEVELOPMENT CORPORATION OF  
OKANAGAN-SIMILKAMEEN**

**Address**

102-3115 SKAHA LAKE ROAD  
PENTICTON BC  
V2A 6G5 Canada

This is **Exhibit "D"** referred to in the affidavit of Navneet Sidhu sworn before me at **Vancouver, BC** this 18th day of March, 2026.

A handwritten signature in black ink, consisting of several fluid, overlapping strokes, positioned above a horizontal line.

A Commissioner for taking Affidavits  
For **British Columbia**



PERSONAL PROPERTY REGISTRY SEARCH RESULT
BC Registries and Online Services

Business Debtor - "MAVERICK VINEYARDS INC."

Search Date and Time: September 8, 2025 at 10:55:57 am Pacific time
Account Name: DENTONS CANADA LLP
Folio Number: 50694-849

TABLE OF CONTENTS

2 Matches in 2 Registrations in Report

Exact Matches: 2 (\*)

Total Search Report Pages: 7

Table with 4 columns: Base Registration, Base Registration Date, Debtor Name, Page. Contains two entries for MAVERICK VINEYARDS INC. on pages 2 and 5.

**Base Registration Number: 173280M**

**Registration Description:** PPSA SECURITY AGREEMENT  
**Act:** PERSONAL PROPERTY SECURITY ACT  
**Base Registration Date and Time:** April 17, 2020 at 9:06:12 am Pacific time  
**Current Expiry Date and Time:** April 17, 2030 at 11:59:59 pm Pacific time  
Expiry date includes subsequent registered renewal(s)  
**Trust Indenture:** No

---

**CURRENT REGISTRATION INFORMATION**

(as of September 8, 2025 at 10:55:57 am Pacific time)

---

**Secured Party Information**

**ROYAL BANK OF CANADA**

**Address**

36 YORK MILLS ROAD, 4TH FLOOR  
TORONTO ON  
M2P 0A4 Canada

**Debtor Information**

**MAVERICK VINEYARDS INC.**

**Address**

3974 HIGHWAY 97  
OLIVER BC  
V0H 1T1 Canada

**Vehicle Collateral**

None

## General Collateral

### Base Registration General Collateral:

ALL OF THE DEBTOR'S PRESENT AND AFTER-ACQUIRED PERSONAL PROPERTY WHEREVER SITUATE INCLUDING BUT NOT LIMITED TO GOODS (INCLUDING INVENTORY, EQUIPMENT (EQUIPMENT INCLUDES, WITHOUT LIMITATION, MACHINERY, TOOLS, APPARATUS, PLANTS, FURNITURE, FIXTURES, AIRCRAFT AND VEHICLES OF WHATSOEVER ,NATURE AND KIND), BUT EXCLUDING CONSUMER GOODS) CHATTEL PAPER, DOCUMENTS OF TITLE, INSTRUMENTS, INTANGIBLES, MONEY, LICENCES, CROPS, SECURITIES AND OTHER INVESTMENT PROPERTY.

## Original Registering Party

**ROYAL BANK OF CANADA**

### Address

36 YORK MILLS ROAD, 4TH FLOOR  
TORONTO ON  
M2P 0A4 Canada

---

**HISTORY**

(Showing most recent first)

---

**RENEWAL**

---

**Registration Date and Time:** March 21, 2025 at 7:57:41 am Pacific time  
**Registration Number:** 118161R  
**Registration Life:** 5 Years  
**New Expiration Date and Time:** April 17, 2030 at 11:59:59 pm Pacific time

**Registering Party Information**

**D + H LIMITED PARTNERSHIP**

**Address**

2 ROBERT SPECK PARKWAY, 15TH FLOOR  
MISSISSAUGA ON  
L4Z 1H8 Canada

## PERSONAL PROPERTY REGISTRY SEARCH RESULT

BC Registries and Online Services

**Base Registration Number: 578508P**

<b>Registration Description:</b>	PPSA SECURITY AGREEMENT
<b>Act:</b>	PERSONAL PROPERTY SECURITY ACT
<b>Base Registration Date and Time:</b>	June 2, 2023 at 3:36:07 pm Pacific time
<b>Current Expiry Date and Time:</b>	June 2, 2028 at 11:59:59 pm Pacific time Expiry date includes subsequent registered renewal(s)
<b>Trust Indenture:</b>	No

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### CURRENT REGISTRATION INFORMATION

(as of September 8, 2025 at 10:55:57 am Pacific time)

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#### Secured Party Information

**AGRICULTURAL CREDIT  
CORPORATION**

**Address**

660 SPEEDVALE AVENUE WEST, SUITE 201  
GUELPH ON  
N1K 1E5 Canada



# PERSONAL PROPERTY REGISTRY SEARCH RESULT

BC Registries and Online Services

## Debtor Information

**MAVERICK VINEYARDS INC.**

**Address**

3974 HIGHWAY 97  
OLIVER BC  
V0H 1T1 Canada

**SHAUNESSY, ROBERT M**

**Address**

137 26 AVE SW SUITE 201  
CALGARY AB  
T2S 0M2 Canada

**Birthdate**

April 25, 1953

**WINDSOR, THOMAS A**

**Address**

3974 HIGHWAY 97  
OLIVER BC  
V0H 1T1 Canada

**Birthdate**

February 27, 1979

**SHAUNESSY, BARBARA A**

**Address**

137 26 AVE SW SUITE 201  
CALGARY AB  
T2S 0M2 Canada

**Birthdate**

March 24, 1952

**NELSON, JAN E**

**Address**

105 115 SYDNEY ST.  
PENTICTON BC  
V2A 9G3 Canada

**Birthdate**

June 1, 1975

## Vehicle Collateral

None

## General Collateral

### Base Registration General Collateral:

AN ONGOING SECURITY INTEREST ON ALL PRESENT AND FUTURE GRAPE CROPS INCLUDING ALL PROCEEDS THEREOF USED AS COLLATERAL FOR WHICH A CASH ADVANCE PAYMENT WAS ISSUED UNDER THE "ADVANCE PAYMENTS PROGRAM "(APP) PURSUANT TO THE AGRICULTURAL MARKETING PROGRAMS ACT (AMPA) AND ANY SUBSEQUENT PRESENT AND FUTURE AGRICULTURAL PRODUCTS OF THE SAME NATURE PRODUCED BY THE PRODUCER WHETHER OR NOT HARVESTED, AND WHETHER OR NOT ATTACHED BY ROOT TO THE LAND. A CONTINUING SECURITY INTEREST ON ALL PROCEEDS MADE PAYABLE TO THE PRODUCER UNDER THE BUSINESS RISK MANAGEMENT PROGRAM (BRM)

## Original Registering Party

**ESC CORPORATE SERVICES LTD.**

### Address

445 KING STREET WEST, SUITE 400  
TORONTO ON  
M5V 1K4 Canada

This is **Exhibit "E"** referred to in the affidavit of Navneet Sidhu sworn before me at **Vancouver, BC** this 18th day of March, 2026.



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A Commissioner for taking Affidavits  
For **British Columbia**

**DENTONS**

**Jordan Schultz**  
Partner

jordan.schultz@dentons.com  
D +1 604 691 6452

**30**  
Dentons Canada LLP  
20th Floor, 250 Howe Street  
Vancouver, BC, Canada V6C 3R8

dentons.com

January 27, 2026

**Delivered Via Courier**

**Maverick Estate Winery Inc.**  
3974 Highway 97  
Oliver, BC V0H 1T1

**Attention:** Jan Nelson

**Maverick Estate Winery Inc.**  
c/o Registered & Records Office, Pushor  
Mitchell LLP  
301 – 1665 Ellis Street  
Kelowna, BC V1Y 2B3

Dear Sirs/Mesdames:

Re: **Your Indebtedness to Royal Bank of Canada (“RBC”)**

We are counsel to RBC in respect of the above captioned matter.

We are instructed that you are indebted to RBC pursuant to certain credit facilities provided to you under a credit agreement dated May 5, 2021 (as amended, the “**Credit Agreement**”). We are further instructed that, as at January 23, 2026, the total amount outstanding in connection with those credit facilities was \$496,507.23, plus interest accruing thereafter and costs (collectively, the “**MEWI Indebtedness**”).

In addition, you have guaranteed the obligations of Maverick Vinyards Inc. (“**MVI**”) to RBC, up to a limit of \$5,830,000 plus interest from the date of demand (the “**Guaranteed Indebtedness**” and together with the MEWI Indebtedness, the “**Indebtedness**”), pursuant to a guarantee and postponement of claim dated February 18, 2022 (the “**Guarantee**”). We are advised by our client that MVI is indebted to RBC in the amount of \$6,110,018.23 as at January 23, 2026, plus interest accruing thereafter and costs, which exceeds to limit under the Guarantee.

Pursuant to instructions from our client, we have issued demand upon MVI, a copy of which is enclosed for your referenced.

As security for the Indebtedness, you have granted the following security to the Bank (the “**Security**”):

- (a) a general security agreement dated April 27, 2020, granted in favour of RBC; and
- (b) a cash collateral agreement dated February 9, 2022, granted in favour of RBC.

We are advised that you are in default of your obligations to RBC pursuant to the terms of the Credit Agreement. As a result, RBC is entitled to demand immediate repayment of all amounts you owe to RBC thereunder. Your liability under the Guarantee arises immediately upon demand.

Therefore, on behalf of our client, we hereby make demand upon you for payment of the Indebtedness. We also make demand upon you pursuant to the Security.

This letter is to advise you that unless payment of the Indebtedness, plus all applicable interest to the date of payment, plus legal costs, is made into this office by certified cheque or bank draft payable to Dentons Canada LLP in trust, on or before **February 27, 2026**, legal proceedings, which may include enforcement of the Security and/or the appointment of a Receiver or a Receiver Manager, may be commenced against you without further notice.

Pursuant to the provisions of the *Bankruptcy and Insolvency Act*, we enclose a Notice of Intention to Enforce Security in the prescribed form, and pursuant to the provisions of the *Farm Debt Mediation Act*, we enclose a Notice of Intent by a Secured Creditor in the prescribed form.

All inquiries and payments should be directed to the attention of the writer to ensure that due credit is given immediately to your account.

Best regards,

Dentons Canada LLP

DocuSigned by:  
*Jordan Schultz*  
FC55D9927B494C2...

Jordan Schultz  
Partner

JS/

**BANKRUPTCY AND INSOLVENCY ACT  
FORM 86  
NOTICE OF INTENTION TO ENFORCE SECURITY  
[Subsection 244(1)]**

TO: MAVERICK ESTATE WINERY INC., an insolvent person,

TAKE NOTICE THAT:

1. ROYAL BANK OF CANADA, a secured creditor, intends to enforce its security on the property of the insolvent person described below:

- (a) all present and after acquired personal property; and
- (b) all amounts now or hereafter standing to the credit of the insolvent person in certain collateral accounts described therein.

2. The security that is to be enforced is in the form of:

- (a) a general security agreement notice of which was registered on April 15, 2020, in the British Columbia Personal Property Registry under base registration number 170485M; and
- (b) a cash collateral agreement notice of which was registered on February 11, 2022, in the British Columbia Personal Property Registry under base registration number 532207N.

3. The total amount of indebtedness secured by the security at January 23, 2026 is \$6,326,507.23, plus costs and interest which continues to accrue.

4. The secured creditor will not have the right to enforce the security until after the expiry of the 10 day period following the sending of this notice, unless the insolvent person consents to an earlier enforcement.

DATED at Vancouver, British Columbia this 27<sup>th</sup> day of January, 2026

ROYAL BANK OF CANADA

DocuSigned by:  
*Jordan Schultz*

\_\_\_\_\_  
DENTONS CANADA LLP, solicitors for Royal Bank of Canada

THE UNDERSIGNED hereby consents to Royal Bank of Canada enforcing its security prior to the expiry of the 10 day notice period described herein.

DATED THIS \_\_\_ day of \_\_\_\_\_ 2026.

**MAVERICK ESTATE WINERY INC.**

Per:

\_\_\_\_\_  
Authorized Signatory



Agriculture and  
Agri-Food Canada  
Farm Debt  
Mediation Service

Agriculture et  
Agroalimentaire Canada  
Service de médiation en  
matière d'endettement agricole

PROTECTED B  
when completed

### NOTICE OF INTENT BY SECURED CREDITOR

As required under Section 21 of the *Farm Debt Mediation Act*, you are hereby notified that it is the intent of:

Name of creditor  
Royal Bank of Canada

To enforce a remedy against the property of; or commence a proceeding, action, execution or other proceeding, judicial or extra-judicial, for the recovery of a debt, the realization of the security or the taking of the property of:

Full name of farmer or business name  
Maverick Estate Winery Inc.

#### Farmer's address

Unit/Suite/Apt.	Street Number	Number Suffix	Street Name	Street Type
	3974		Highway 97	
Street direction	PO Box or Route Number	Municipality (City, Town, etc.)	Province	Postal code
		Oliver	British Columbia	V0H 1T1
The security being (type(s) of security)			on (asset(s))	
General Security Agreement			All Present and After Acquired Personal Property	
Cash Collateral Agreement			Accounts	

Dated this 27 day of January, 2026 at Vancouver, BC

Jordan Schultz, solicitor and agent of the Royal Bank of Canada	
Name of secured creditor or authorized representative (print)	
Signature of secured creditor or authorized representative	604-691-6452
	Creditor's phone number and ext.
Email address of secured creditor or authorized representative	
	Creditor's fax number

You are hereby notified of your right to make application under Section 5 of the *Farm Debt Mediation Act* for a review of your financial affairs, mediation with your creditors, and to obtain a stay of proceedings against this action. Provided you are:

- a) currently engaged in farming for commercial purposes; and
- b) insolvent, meaning that you are:
- unable to meet your obligations as they generally become due; or
  - have ceased paying your current obligations in the ordinary course of business as they generally become due; or
  - the aggregate of your property is not, at fair valuation, sufficient, or if disposed of at a fairly conducted sale under legal process would not be sufficient, to enable payment of all your obligations, due and accruing due.

**A secured creditor must wait 15 business days after this notice has been deemed served before beginning action to realize on their security. You may apply for mediation and a stay of proceedings at any time, before, during, or after the 15 business day period, by making an application to the Farm Debt Mediation Service.**

The Farm Debt Mediation Service provides qualified farm financial counsellors to conduct a financial review and to prepare a recovery plan for your mediation meeting. Qualified mediators are provided to help you and your creditors reach a mutually satisfactory arrangement.

Application forms and more information about the service can be obtained from:

#### Farm Debt Mediation Service

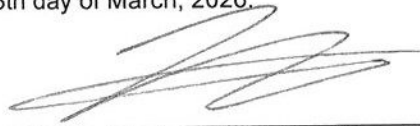
[agriculture.canada.ca/fdms](http://agriculture.canada.ca/fdms)

**Eastern Canada Office**  
Tel: 1-866-452-5556  
Email: [aafc.fdms-smmea.aac@agr.gc.ca](mailto:aafc.fdms-smmea.aac@agr.gc.ca)  
Fax: 1-833-902-8388

**Western Canada Office**  
Tel: 1-866-452-5556  
Email: [aafc.fdms-smmea.aac@agr.gc.ca](mailto:aafc.fdms-smmea.aac@agr.gc.ca)  
Fax: 1-833-902-8388

The information you provide on this document is collected by Agriculture and Agri-Food Canada under the authority of the *Farm Debt Mediation Act* for the purpose of facilitating financial arrangements between farmers and their creditors. Personal information will be protected under the provisions of the *Privacy Act* and will be stored in Personal Information Bank AAFC-PPU-227. Information may be accessible or protected as required under the provisions of the *Access to Information Act*.

This is **Exhibit "F"** referred to in the affidavit of Navneet Sidhu sworn before me at **Vancouver, BC** this 18th day of March, 2026.



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A Commissioner for taking Affidavits  
For **British Columbia**

**DENTONS**

**Jordan Schultz**  
Partner  
jordan.schultz@dentons.com  
D +1 604 691 6452

**35**  
Dentons Canada LLP  
20th Floor, 250 Howe Street  
Vancouver, BC, Canada V6C 3R8

dentons.com

January 27, 2026

**Delivered Via Courier and Email**

**Maverick Vineyards Inc.**

3974 Highway 97  
Oliver, BC V0H 1T1

**Attention:** Jan Nelson

**Maverick Vineyards Inc.**

c/o Registered & Records Office, Pushor  
Mitchell LLP  
301 – 1665 Ellis Street  
Kelowna, BC V1Y 2B3

Dear Sirs/Mesdames:

Re: **Your Indebtedness to Royal Bank of Canada (“RBC”)**

We are counsel to RBC in respect of the above captioned matter.

We are instructed that you are indebted to RBC pursuant to certain credit facilities provided to you under a credit agreement dated March 27, 2025 (the **“Credit Agreement”**). We are further instructed that, as at January 23, 2026, the total amount outstanding in connection with those credit facilities was \$6,110,018.23, plus interest accruing thereafter and costs (collectively, the **“MVI Indebtedness”**).

In addition, you have guaranteed the obligations of Maverick Estate Winery Inc. (**“MEWI”**) to RBC, up to a limit of \$580,000 plus interest from the date of demand, pursuant to a guarantee and postponement of claim dated May 18, 2021 (the **“Guarantee”**). We are advised by our client that MEWI is indebted to RBC in the amount of \$496,507.23 as at January 23, 2026, plus interest accruing thereafter and costs (the **“Guaranteed Indebtedness”** and together with the MEWI Indebtedness, the **“Indebtedness”**).

Pursuant to instructions from our client, we have issued demand upon MEWI, a copy of which is enclosed for your referenced.

As security for the Indebtedness, you have granted the following security to the Bank (the **“Security”**):

- (a) a general security agreement dated April 27, 2020, granted in favour of RBC;
- (b) a mortgage and assignment of rents dated April 27, 2020 granted in favour of RBC and bearing a notation as to registration in the Kamloops Land Title Office of CA8158220-CA8158221, charging the following lands:

PID: 003-005-798

LOT 1 DISTRICT LOT 2450S SIMILKAMEEN DIVISION YALE DISTRICT PLAN  
34148; and

- (c) a mortgage dated June 4, 2021 granted in favour of RBC and bearing a notation as to registration in the Kamloops Land Title Office of CA9072108, charging the following lands:

PID: 014-968-061

BLOCK A OF DISTRICT LOT 1052S SIMILKAMEEN DIVISION YALE  
DISTRICT.

We are advised that you are in default of your obligations to RBC pursuant to the terms of the Credit Agreement. As a result, RBC is entitled to demand immediate repayment of all amounts you owe to RBC thereunder. Your liability under the Guarantee arises immediately upon demand.

Therefore, on behalf of our client, we hereby make demand upon you for payment of the Indebtedness. We also make demand upon you pursuant to the Security.

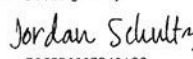
This letter is to advise you that unless payment of the Indebtedness, plus all applicable interest to the date of payment, plus legal costs, is made into this office by certified cheque or bank draft payable to Dentons Canada LLP in trust, on or before **February 27, 2026**, legal proceedings, which may include enforcement of the Security and/or the appointment of a Receiver or a Receiver Manager, may be commenced against you without further notice.

Pursuant to the provisions of the *Bankruptcy and Insolvency Act*, we enclose a Notice of Intention to Enforce Security in the prescribed form, and pursuant to the provisions of the *Farm Debt Mediation Act*, we enclose a Notice of Intent by a Secured Creditor in the prescribed form.

All inquiries and payments should be directed to the attention of the writer to ensure that due credit is given immediately to your account.

Best regards,

Dentons Canada LLP

DocuSigned by:  
  
FC55D9927B494C2

Jordan Schultz  
Partner

JS/

**BANKRUPTCY AND INSOLVENCY ACT**  
**FORM 86**  
**NOTICE OF INTENTION TO ENFORCE SECURITY**  
**[Subsection 244(1)]**

TO: MAVERICK VINEYARDS INC., an insolvent person,

TAKE NOTICE THAT:

1. ROYAL BANK OF CANADA, a secured creditor, intends to enforce its security on the property of the insolvent person described below:

- (a) the real property, legally described as PID: 003-005-798 LOT 1 DISTRICT LOT 2450S SIMILKAMEEN DIVISION YALE DISTRICT PLAN 34148;
- (b) the real property, legally described as PID: 014-968-061 BLOCK A OF DISTRICT LOT 1052S SIMILKAMEEN DIVISION YALE DISTRICT; and
- (c) all present and after acquired personal property.

2. The security that is to be enforced is in the form of:

- (a) a mortgage and assignment of rents in respect of the lands described in Paragraph 1(a) registered in the Kamloops Land Title Office on April 27, 2020 under charge nos.CA8158220-CA8158221;
- (b) a mortgage and assignment of rents in respect of the lands described in Paragraph 1(b) registered in the Kamloops Land Title Office on June 4, 2021 under charge no.CA9072108; and
- (c) a general security agreement notice of which was registered on April 17, 2020, in the British Columbia Personal Property Registry under base registration number 173280M.

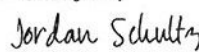
3. The total amount of indebtedness secured by the security at January 23, 2026 is \$6,606,525.46, plus costs and interest which continues to accrue.

4. The secured creditor will not have the right to enforce the security until after the expiry of the 10 day period following the sending of this notice, unless the insolvent person consents to an earlier enforcement.

DATED at Vancouver, British Columbia this 27<sup>th</sup> day of January, 2026

ROYAL BANK OF CANADA

DocuSigned by:



FC55B9927D191402  
DENTONS CANADA LLP, solicitors for Royal  
Bank of Canada

THE UNDERSIGNED hereby consents to Royal Bank of Canada enforcing its security prior to the expiry of the 10 day notice period described herein.

DATED THIS \_\_\_ day of \_\_\_\_\_ 2026.

**MAVERICK VINEYARDS INC.**

Per:

\_\_\_\_\_  
Authorized Signatory



Agriculture and  
Agri-Food Canada  
Farm Debt  
Mediation Service

Agriculture et  
Agroalimentaire Canada  
Service de médiation en  
matière d'endettement agricole

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when completed

### NOTICE OF INTENT BY SECURED CREDITOR

As required under Section 21 of the *Farm Debt Mediation Act*, you are hereby notified that it is the intent of:

Name of creditor  
Royal Bank of Canada

To enforce a remedy against the property of; or commence a proceeding, action, execution or other proceeding, judicial or extra-judicial, for the recovery of a debt, the realization of the security or the taking of the property of:

Full name of farmer or business name  
Maverick Vinyards Inc.

#### Farmer's address

Unit/Suite/Apt.	Street Number	Number Suffix	Street Name	Street Type
	3974		Highway 97	
Street direction	PO Box or Route Number	Municipality (City, Town, etc.)	Province	Postal code
		Oliver	British Columbia	V0H 1T1
The security being (type(s) of security)			on (asset(s))	
General Security Agreement			All Present and After Acquired Personal Property	
Mortgage CA8158220-CA8158221			Real property with PID: 003-005-798	
Mortgage CA9072108			Real property with PID: 014-968-061	

Dated this 27 day of January, 2026 at Vancouver, BC

Jordan Schultz, solicitor and agent of the Royal Bank of Canada

Name of secured creditor or authorized representative (print)

Signature of secured creditor or authorized representative

Email address of secured creditor or authorized representative

604-691-6452

Creditor's phone number and ext.

Creditor's fax number

You are hereby notified of your right to make application under Section 5 of the *Farm Debt Mediation Act* for a review of your financial affairs, mediation with your creditors, and to obtain a stay of proceedings against this action. Provided you are:

- a) currently engaged in farming for commercial purposes; and
- b) insolvent, meaning that you are:
- unable to meet your obligations as they generally become due; or
  - have ceased paying your current obligations in the ordinary course of business as they generally become due; or
  - the aggregate of your property is not, at fair valuation, sufficient, or if disposed of at a fairly conducted sale under legal process would not be sufficient, to enable payment of all your obligations, due and accruing due.

**A secured creditor must wait 15 business days after this notice has been deemed served before beginning action to realize on their security. You may apply for mediation and a stay of proceedings at any time, before, during, or after the 15 business day period, by making an application to the Farm Debt Mediation Service.**

The Farm Debt Mediation Service provides qualified farm financial counsellors to conduct a financial review and to prepare a recovery plan for your mediation meeting. Qualified mediators are provided to help you and your creditors reach a mutually satisfactory arrangement. Application forms and more information about the service can be obtained from:

#### Farm Debt Mediation Service

[agriculture.canada.ca/fdms](http://agriculture.canada.ca/fdms)

##### Eastern Canada Office

Tel: 1-866-452-5556  
Email: [aafc.fdms-smmea.aac@agr.gc.ca](mailto:aafc.fdms-smmea.aac@agr.gc.ca)  
Fax: 1-833-902-8388

##### Western Canada Office

Tel: 1-866-452-5556  
Email: [aafc.fdms-smmea.aac@agr.gc.ca](mailto:aafc.fdms-smmea.aac@agr.gc.ca)  
Fax: 1-833-902-8388

The information you provide on this document is collected by Agriculture and Agri-Food Canada under the authority of the *Farm Debt Mediation Act* for the purpose of facilitating financial arrangements between farmers and their creditors. Personal information will be protected under the provisions of the *Privacy Act* and will be stored in Personal Information Bank AAFC-PPU-227. Information may be accessible or protected as required under the provisions of the *Access to Information Act*.

This is **Exhibit "G"** referred to in the affidavit of Navneet Sidhu sworn before me at **Vancouver, BC** this 18th day of March, 2026.



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A Commissioner for taking Affidavits  
For **British Columbia**

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

BETWEEN:

ROYAL BANK OF CANADA

PLAINTIFF

AND:

MAVERICK ESTATE WINERY INC.  
MAVERICK VINEYARDS INC.  
JAN NELSON  
THOMAS ANDREW WINDSOR

DEFENDANTS

**CONSENT**

KSV Restructuring Inc. hereby consents to its appointment as court-appointed receiver and manager of all of the assets, undertakings, and properties of Maverick Estate Winery Inc. and Maverick Vineyards Inc., including all proceeds, if so appointed by this Honourable Court.

DATED at the City of Calgary, in the Province of Alberta, this 16 day of March, 2026.

KSV Restructuring Inc.

Per:

DocuSigned by:



87E48B2D2D52481

Name: Jason Knight

Title: Managing Director