

Clerk's stamp:



COURT FILE NUMBER

2301 10472

COURT

COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE

CALGARY

PLAINTIFF

AVONLEA-DREWRY HOLDINGS INC.

DEFENDANT(S)

**PATHWAY HEALTH CORP., PATHWAY
HEALTH SERVICES CORP., PATHWAY
HEALTHCARE TECHNOLOGIES CORP.,
2563367 ONTARIO LIMITED AND SLAWNER
ORTHO LTEE.**

DOCUMENT

AFFIDAVIT OF SERVICE

COM

ADDRESS FOR SERVICE AND CONTACT
INFORMATION OF PARTY FILING THIS
DOCUMENT

Dentons Canada LLP
Bankers Court
15th Floor, 850 - 2nd Street S.W.
Calgary, Alberta T2P 0R8

August 10, 2023

Attention: Derek Pontin

Ph. (403) 268-268-6301 Fx. (403) 268-3100

File No.:

AFFIDAVIT OF TERRY TROJANOSKI**SWORN AUGUST 9, 2023**

I, TERRY TROJANOSKI, of the City of Airdrie, in the Province of Alberta, **MAKE OATH AND SAY THAT:**

1. I am a Legal Assistant with Dentons Canada LLP, Barristers and Solicitors ("**Dentons**"), counsel to Avonlea-Drewry Holdings Inc., the Plaintiff in this Action. As such, I have knowledge of the matters herein deposed to save where stated to be based upon information and belief and where so stated I do verily believe the same to be true.
2. Attached hereto and marked as **Exhibit "A"** is a copy of an Alberta Personal Property Registry ("**PPR**") search of Pathway Health Corp. dated August 9, 2023.
3. Attached hereto and marked as **Exhibit "B"** is a copy of a PPR search of Pathway Health Services Corp. dated August 9, 2023.

4. Attached hereto and marked as **Exhibit "C"** is a copy of a PPR search of Pathway Healthcare Technologies Corp. dated August 9, 2023.

SWORN before me at the City of Calgary, in
the Province of Alberta, the 9th day of August,
2023


Commissioner for Oaths in and for the
Province of Alberta

Afshan Naveed
Barrister & Solicitor

TERRY TROJANSKI

THIS IS EXHIBIT "A"
REFERRED TO IN THE AFFIDAVIT OF
TERRY TROJANOSKI

Sworn before me this 9th day of August, 2023



**A COMMISSIONER FOR OATHS IN AND
FOR THE PROVINCE OF ALBERTA**

**Afshan Naveed
Barrister & Solicitor**

Search ID #: Z16441149

Transmitting Party

DENTONS CANADA LLP
Attention: Accounting
15 FI Bankers Court, 850 2 Street SW
CALGARY, AB T2P 0R8

Party Code: 50017904
Phone #: 403 268 6876
Reference #: 002002-18

Search ID #: Z16441149

Date of Search: 2023-Aug-09

Time of Search: 14:51:43

Business Debtor Search For:

PATHWAY HEALTH CORP.

Both Exact and Inexact Result(s) Found

NOTE:

A complete Search may result in a Report of Exact and Inexact Matches.
Be sure to read the reports carefully.



Search ID #: Z16441149

Business Debtor Search For:

PATHWAY HEALTH CORP.

Search ID #: Z16441149

Date of Search: 2023-Aug-09

Time of Search: 14:51:43

Registration Number: 23020717584

Registration Date: 2023-Feb-07

Registration Type: SECURITY AGREEMENT

Registration Status: Current

Expiry Date: 2028-Feb-07 23:59:59

Exact Match on:

Debtor

No: 1

Debtor(s)

Block

Status

Current

1 PATHWAY HEALTH CORP.
16 FOUR SEASONS PLACE, SUITE 203A
ETOBICOKE, ON M9B 6E5

Secured Party / Parties

Block

Status

Current

1 HEAL GLOBAL HOLDINGS CORP.
12TH FLOOR, 850 - 2 STREET SW
CALGARY, AB T2P 0R8
Email: steeleconsult@aol.com

Collateral: General

Block

Description

Status

1 All present and after-acquired personal property of the debtor.

Current

Search ID #: Z16441149

Business Debtor Search For:

PATHWAY HEALTH CORP.

Search ID #: Z16441149

Date of Search: 2023-Aug-09

Time of Search: 14:51:43

Registration Number: 23020717625

Registration Date: 2023-Feb-07

Registration Type: LAND CHARGE

Registration Status: Current

Registration Term: Infinity

Exact Match on:

Debtor

No: 1

Debtor(s)

Block

Status

Current

1 PATHWAY HEALTH CORP.
16 FOUR SEASONS PLACE, SUITE 203A
ETOBICOKE, ON M9B 6E5

Secured Party / Parties

Block

Status

Current

1 HEAL GLOBAL HOLDINGS CORP.
12TH FLOOR, 850 - 2 STREET SW
CALGARY, AB T2P 0R8
Email: steeleconsult@aol.com

Search ID #: Z16441149

Business Debtor Search For:

PATHWAY HEALTH CORP.

Search ID #: Z16441149

Date of Search: 2023-Aug-09

Time of Search: 14:51:43

Registration Number: 23080928762

Registration Date: 2023-Aug-09

Registration Type: LAND CHARGE

Registration Status: Current

Registration Term: Infinity

Exact Match on:

Debtor

No: 1

Debtor(s)

Block

Status

Current

1 PATHWAY HEALTH CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Secured Party / Parties

Block

Status

Current

1 AVONLEA-DREWRY HOLDINGS INC.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8
Email: ppr.alberta@dentons.com

Search ID #: Z16441149

Business Debtor Search For:

PATHWAY HEALTH CORP.

Search ID #: Z16441149

Date of Search: 2023-Aug-09 Time of Search: 14:51:43

Registration Number: 23080928832

Registration Date: 2023-Aug-09

Registration Type: SECURITY AGREEMENT

Registration Status: Current

Expiry Date: 2028-Aug-09 23:59:59

Exact Match on: Debtor No: 1

Debtor(s)

Block

Status

Current

1 PATHWAY HEALTH CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Secured Party / Parties

Block

Status

Current

1 AVONLEA-DREWRY HOLDINGS INC.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8
Email: ppr.alberta@dentons.com

Collateral: General

Block

Description

Status

1 All present and after-acquired personal property of the debtor.

Current

2 Proceeds: all present and after-acquired property of the debtor.

Current

Search ID #: Z16441149

Business Debtor Search For:

PATHWAY HEALTH CORP.

Search ID #: Z16441149

Date of Search: 2023-Aug-09 Time of Search: 14:51:43

Registration Number: 23080928941

Registration Date: 2023-Aug-09

Registration Type: SECURITY AGREEMENT

Registration Status: Current

Expiry Date: 2028-Aug-09 23:59:59

Exact Match on: Debtor No: 1

Debtor(s)

Block

Status
Current

1 PATHWAY HEALTH CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Secured Party / Parties

Block

Status
Current

1 AVONLEA-DREWRY HOLDINGS INC.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8
Email: ppr.alberta@dentons.com

Search ID #: Z16441149

Collateral: General

<u>Block</u>	<u>Description</u>	<u>Status</u>
1	<p>All issued and outstanding shares in the capital of Pathway Health Services Corp., Pathway Wellness Corp., Pathway Healthcare Technologies Corp. and 2563367 Ontario Limited (collectively, the "Corporations"), including any shares in the Corporations now or hereafter registered in the debtor's name, together with any replacements thereof and substitutions therefor, and all certificates and instruments evidencing or representing such shares (collectively, the "Pledged Shares").</p> <p>All present and future dividends, whether in cash or kind, and any other payments received or receivable upon or in respect of any of the Pledged Shares, and all monies, investment property or other property payable or paid on account of any return or repayment of capital in respect of any of the Pledged Shares or otherwise distributed in respect thereof or which shall in any way be charged to, or payable or paid out of, the capital of the Corporations on account of the Pledged Shares.</p> <p>All other property that may at any time be received or receivable by or otherwise distributed in respect of, or in substitution for, or in exchange for, any of the foregoing whether by way of dividends, dividends in kind, mergers, recapitalizations, consolidations, combinations or exchanges of the Pledged Shares.</p> <p>All present and future rights, interest and claims of the debtor relating to or arising from the Pledged Shares, including all rights to receive notices of and attend shareholder meetings, as applicable, and all rights to vote the Pledged Shares.</p> <p>Proceeds: accounts, chattel paper, money, intangibles, goods, documents of title, instruments and investment property.</p>	Current
2	<p>Proceeds: all present and after-acquired property of the debtor.</p>	Current

Search ID #: Z16441149

Note:

The following is a list of matches closely approximating your Search Criteria,
which is included for your convenience and protection.

Debtor Name / Address

PATHWAY HEALTH SERVICES CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Reg.#

23080929068

LAND CHARGE

Debtor Name / Address

PATHWAY HEALTH SERVICES CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Reg.#

23080929162

SECURITY AGREEMENT

Debtor Name / Address

PATHWAY HEALTH SERVICES CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Reg.#

23080929245

SECURITY AGREEMENT

Debtor Name / Address

PATHWAY HEALTHCARE TECHNOLOGIES CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Reg.#

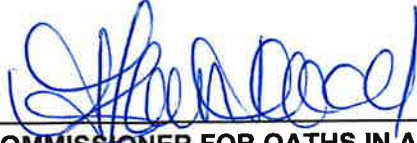
23080929417

SECURITY AGREEMENT

Result Complete

THIS IS EXHIBIT "B"
REFERRED TO IN THE AFFIDAVIT OF
TERRY TROJANOSKI

Sworn before me this 9th day of August, 2023



**A COMMISSIONER FOR OATHS IN AND
FOR THE PROVINCE OF ALBERTA**

*Afshan Naveed
Barrister & Solicitor*

Search ID #: Z16441160

Transmitting Party

DENTONS CANADA LLP
Attention: Accounting
15 FI Bankers Court, 850 2 Street SW
CALGARY, AB T2P 0R8

Party Code: 50017904
Phone #: 403 268 6876
Reference #: 002002-18

Search ID #: Z16441160

Date of Search: 2023-Aug-09

Time of Search: 14:52:38

Business Debtor Search For:

PATHWAY HEALTH SERVICES CORP.

Both Exact and Inexact Result(s) Found

NOTE:

A complete Search may result in a Report of Exact and Inexact Matches.
Be sure to read the reports carefully.



Search ID #: Z16441160

Business Debtor Search For:

PATHWAY HEALTH SERVICES CORP.

Search ID #: Z16441160

Date of Search: 2023-Aug-09

Time of Search: 14:52:38

Registration Number: 23080929068

Registration Type: LAND CHARGE

Registration Date: 2023-Aug-09

Registration Status: Current

Registration Term: Infinity

Exact Match on:

Debtor

No: 1

Debtor(s)

Block

Status

Current

1 PATHWAY HEALTH SERVICES CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Secured Party / Parties

Block

Status

Current

1 AVONLEA-DREWRY HOLDINGS INC.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8
Email: ppr.alberta@dentons.com

Search ID #: Z16441160

Business Debtor Search For:

PATHWAY HEALTH SERVICES CORP.

Search ID #: Z16441160

Date of Search: 2023-Aug-09

Time of Search: 14:52:38

Registration Number: 23080929162

Registration Date: 2023-Aug-09

Registration Type: SECURITY AGREEMENT

Registration Status: Current

Expiry Date: 2028-Aug-09 23:59:59

Exact Match on:

Debtor

No: 1

Debtor(s)

Block

Status

Current

1 PATHWAY HEALTH SERVICES CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Secured Party / Parties

Block

Status

Current

1 AVONLEA-DREWRY HOLDINGS INC.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8
Email: ppr.alberta@dentons.com

Collateral: General

Block

Description

Status

1 All present and after-acquired personal property of the debtor.

Current

2 Proceeds: all present and after-acquired property of the debtor.

Current

Search ID #: Z16441160

Business Debtor Search For:

PATHWAY HEALTH SERVICES CORP.

Search ID #: Z16441160

Date of Search: 2023-Aug-09

Time of Search: 14:52:38

Registration Number: 23080929245

Registration Date: 2023-Aug-09

Registration Type: SECURITY AGREEMENT

Registration Status: Current

Expiry Date: 2028-Aug-09 23:59:59

Exact Match on:

Debtor

No: 1

Debtor(s)

Block

Status

Current

1 PATHWAY HEALTH SERVICES CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Secured Party / Parties

Block

Status

Current

1 AVONLEA-DREWRY HOLDINGS INC.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8
Email: ppr.alberta@dentons.com

Search ID #: Z16441160

Collateral: General

<u>Block</u>	<u>Description</u>	<u>Status</u>
1	<p>All issued and outstanding shares in the capital of 10030712 Manitoba Ltd, 2563367 Ontario Limited and Slawner Ortho Ltee. (collectively, the "Corporations"), including any shares in the Corporations now or hereafter registered in the debtor's name, together with any replacements thereof and substitutions therefor, and all certificates and instruments evidencing or representing such shares (collectively, the "Pledged Shares").</p> <p>All present and future dividends, whether in cash or kind, and any other payments received or receivable upon or in respect of any of the Pledged Shares, and all monies, investment property or other property payable or paid on account of any return or repayment of capital in respect of any of the Pledged Shares or otherwise distributed in respect thereof or which shall in any way be charged to, or payable or paid out of, the capital of the Corporations on account of the Pledged Shares.</p> <p>All other property that may at any time be received or receivable by or otherwise distributed in respect of, or in substitution for, or in exchange for, any of the foregoing whether by way of dividends, dividends in kind, mergers, recapitalizations, consolidations, combinations or exchanges of the Pledged Shares.</p> <p>All present and future rights, interest and claims of the debtor relating to or arising from the Pledged Shares, including all rights to receive notices of and attend shareholder meetings, as applicable, and all rights to vote the Pledged Shares.</p> <p>Proceeds: accounts, chattel paper, money, intangibles, goods, documents of title, instruments and investment property.</p>	Current
2	<p>Proceeds: all present and after-acquired property of the debtor.</p>	Current

Search ID #: Z16441160

Note:

The following is a list of matches closely approximating your Search Criteria,
which is included for your convenience and protection.

Debtor Name / Address

PATHWAY HEALTH CORP.
16 FOUR SEASONS PLACE, SUITE 203A
ETOBICOKE, ON M9B 6E5

Reg.#

23020717584

SECURITY AGREEMENT

Debtor Name / Address

PATHWAY HEALTH CORP.
16 FOUR SEASONS PLACE, SUITE 203A
ETOBICOKE, ON M9B 6E5

Reg.#

23020717625

LAND CHARGE

Debtor Name / Address

PATHWAY HEALTH CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Reg.#

23080928762

LAND CHARGE

Debtor Name / Address

PATHWAY HEALTH CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Reg.#

23080928832

SECURITY AGREEMENT

Debtor Name / Address

PATHWAY HEALTH CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Reg.#

23080928941

SECURITY AGREEMENT

Debtor Name / Address

PATHWAY HEALTHCARE TECHNOLOGIES CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Reg.#

23080929417

SECURITY AGREEMENT

THIS IS EXHIBIT "C"
REFERRED TO IN THE AFFIDAVIT OF
TERRY TROJANOSKI

Sworn before me this 9th day of August, 2023



**A COMMISSIONER FOR OATHS IN AND
FOR THE PROVINCE OF ALBERTA**

Afshan Naveed
Barrister & Solicitor

Search ID #: Z16441182

Transmitting Party

DENTONS CANADA LLP
Attention: Accounting
15 FI Bankers Court, 850 2 Street SW
CALGARY, AB T2P 0R8

Party Code: 50017904
Phone #: 403 268 6876
Reference #: 002002-18

Search ID #: Z16441182

Date of Search: 2023-Aug-09

Time of Search: 14:53:50

Business Debtor Search For:

PATHWAY HEALTHCARE TECHNOLOGIES CORP.

Both Exact and Inexact Result(s) Found

NOTE:

A complete Search may result in a Report of Exact and Inexact Matches.
Be sure to read the reports carefully.



Search ID #: Z16441182

Business Debtor Search For:

PATHWAY HEALTHCARE TECHNOLOGIES CORP.

Search ID #: Z16441182

Date of Search: 2023-Aug-09

Time of Search: 14:53:50

Registration Number: 23080929417

Registration Date: 2023-Aug-09

Registration Type: SECURITY AGREEMENT

Registration Status: Current

Expiry Date: 2028-Aug-09 23:59:59

Exact Match on:

Debtor

No: 1

Debtor(s)

Block

Status

Current

1 PATHWAY HEALTHCARE TECHNOLOGIES CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Secured Party / Parties

Block

Status

Current

1 AVONLEA-DREWRY HOLDINGS INC.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8
Email: ppr.alberta@dentons.com

Search ID #: Z16441182

Collateral: General

<u>Block</u>	<u>Description</u>	<u>Status</u>
1	<p>All issued and outstanding shares in the capital of 1964433 Alberta Ltd. (the "Corporation"), including any shares in the Corporation now or hereafter registered in the debtor's name, together with any replacements thereof and substitutions therefor, and all certificates and instruments evidencing or representing such shares (collectively, the "Pledged Shares").</p> <p>All present and future dividends, whether in cash or kind, and any other payments received or receivable upon or in respect of any of the Pledged Shares, and all monies, investment property or other property payable or paid on account of any return or repayment of capital in respect of any of the Pledged Shares or otherwise distributed in respect thereof or which shall in any way be charged to, or payable or paid out of, the capital of the Corporation on account of the Pledged Shares.</p> <p>All other property that may at any time be received or receivable by or otherwise distributed in respect of, or in substitution for, or in exchange for, any of the foregoing whether by way of dividends, dividends in kind, mergers, recapitalizations, consolidations, combinations or exchanges of the Pledged Shares.</p> <p>All present and future rights, interest and claims of the debtor relating to or arising from the Pledged Shares, including all rights to receive notices of and attend shareholder meetings, as applicable, and all rights to vote the Pledged Shares.</p> <p>Proceeds: accounts, chattel paper, money, intangibles, goods, documents of title, instruments and investment property.</p>	Current
2	<p>Proceeds: all present and after-acquired property of the debtor.</p>	Current

Search ID #: Z16441182

Note:

The following is a list of matches closely approximating your Search Criteria,
which is included for your convenience and protection.

Debtor Name / Address

PATHWAY HEALTH CORP.
16 FOUR SEASONS PLACE, SUITE 203A
ETOBICOKE, ON M9B 6E5

Reg.#

23020717584

SECURITY AGREEMENT

Debtor Name / Address

PATHWAY HEALTH CORP.
16 FOUR SEASONS PLACE, SUITE 203A
ETOBICOKE, ON M9B 6E5

Reg.#

23020717625

LAND CHARGE

Debtor Name / Address

PATHWAY HEALTH CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Reg.#

23080928762

LAND CHARGE

Debtor Name / Address

PATHWAY HEALTH CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Reg.#

23080928832

SECURITY AGREEMENT

Debtor Name / Address

PATHWAY HEALTH CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Reg.#

23080928941

SECURITY AGREEMENT

Debtor Name / Address

PATHWAY HEALTH SERVICES CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Reg.#

23080929068

LAND CHARGE

Debtor Name / Address

Reg.#

Search ID #: Z16441182

PATHWAY HEALTH SERVICES CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

23080929162

SECURITY AGREEMENT

Debtor Name / Address

PATHWAY HEALTH SERVICES CORP.
15TH FLR, BANKERS COURT, 850 - 2ND ST SW
CALGARY, AB T2P0R8

Reg.#

23080929245

SECURITY AGREEMENT

Result Complete