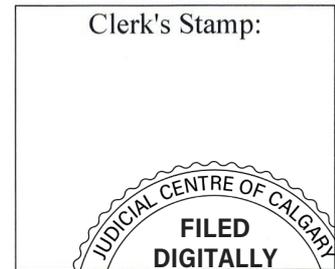


COURT FILE NUMBER 2301-08305  
COURT COURT OF KING'S BENCH OF ALBERTA  
JUDICIAL CENTRE CALGARY



IN THE MATTER OF THE COMPANIES' CREDITORS  
ARRANGEMENT ACT, RSC 1985, c. C-36, as amended

AND IN THE MATTER OF THE COMPROMISE OR  
ARRANGEMENT OF WALLACE & CAREY INC., LOUDON BROS  
LIMITED and CAREY MANAGEMENT INC.

APPLICANT DIGIFLEX INFORMATION SYSTEMS INC.  
DOCUMENT **AFFIDAVIT OF MOHAMAD Z. MARDUKHI**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT  
**Burnet, Duckworth & Palmer LLP**  
2400, 525 – 8 Avenue SW  
Calgary, Alberta T2P 1G1  
**Lawyer: Chelsea Nimmo / Florence Hogg**  
Phone Number: (403) 260-0102  
Fax Number: (403) 260-0332  
Email Address: [cnimmo@bdplaw.com](mailto:cnimmo@bdplaw.com)  
File No. 79894-1

**AFFIDAVIT OF MOHAMAD MARDUKHI**

Affirmed on February 2, 2026

I, Mohamad Mardukhi, of Vancouver, British Columbia, AFFIRM AND SAY THAT:

1. I am the same Mr. Mardukhi that affirmed an affidavit on behalf of myself and Digiflex Information Systems Inc. (**Digiflex**) on November 14, 2025 (my **First Affidavit**) and November 25, 2025 (my **Second Affidavit**) and on January 30, 2026 (my **Third Affidavit**) in the above noted CCAA Proceeding. I have personal knowledge of the matters deposed to in this affidavit, except where stated to be based on information and belief, in which case, I believe the information to be true.

2. I make this affidavit in response to the Monitor's application seeking a declaration that, notwithstanding the lifting of the stay of proceedings against Wallace & Carey Inc. (**W&C**) and Loudon

Bros Limited (**Loudon**) vis-à-vis Digiflex, W&C and Loudon are permitted to use the ERP Software for any purpose related to the business and operations of W&C and Loudon.

3. On January 31, 2026, Digiflex lost access to its connection to the copy of the Digiflex software that was installed on the server that I understand was sold from Wallace & Carey to 7-Eleven Canada Inc. (the "**Designated Server**").

4. Digiflex requires access to all copies of the software that it has installed for its clients. Part of the reason is because the software is Digiflex's intellectual property. The software is not the property of the client. It has only been licensed to the client for specific uses.

5. The fact that Digiflex no longer has access to the copy of the Digiflex software that was installed on the Designated Server does not mean that the Digiflex software is no longer in use. It simply means that Wallace & Carey and/or someone at SEDCC removed Digiflex's access.

6. As I stated in my Third Affidavit, my concerns remain that 7-Eleven Canada / SEDCC are still using the Digiflex software to run their distribution business.

7. The deponent was not physically present before the commissioner but was linked with the commissioner utilizing video technology, and the process for remote commissioning of affidavits was utilized as described in the March 25, 2020, *Notice to the Profession and Public: Remote Commissioning of Affidavits/or use in Civil and Family Proceedings during the COVID-19 Pandemic*.

AFFIRMED BEFORE ME BY VIDEO )  
CONFERENCE at the City of Calgary, in the )  
Province of Alberta, this 2<sup>nd</sup> day of February, )  
2026. )  
)  
)  
)

\_\_\_\_\_  
A Commissioner for Oaths in and for the Province  
of Alberta.

  
\_\_\_\_\_  
**Mohamad Mardukhi**



Clerk's Stamp:

COURT FILE NUMBER 2301-08305  
COURT COURT OF KING'S BENCH OF ALBERTA  
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DOCUMENT AFFIDAVIT OF MOHAMAD Z. MARDUKHI

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT  
**Burnet, Duckworth & Palmer LLP**  
2400, 525 – 8 Avenue SW  
Calgary, Alberta T2P 1G1  
**Lawyer: Chelsea Nimmo / Florence Hogg**  
Phone Number: (403) 260-0102  
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Email Address: [cnimmo@bdplaw.com](mailto:cnimmo@bdplaw.com)  
File No. 79894-1

**AFFIDAVIT OF MOHAMAD MARDUKHI**

Affirmed on February 2, 2026

I, Mohamad Mardukhi, of Vancouver, British Columbia, AFFIRM AND SAY THAT:

1. I am the same Mr. Mardukhi that affirmed an affidavit on behalf of myself and Digiflex Information Systems Inc. (**Digiflex**) on November 14, 2025 (my **First Affidavit**) and November 25, 2025 (my **Second Affidavit**) and on January 30, 2026 (my **Third Affidavit**) in the above noted CCAA Proceeding. I have personal knowledge of the matters deposed to in this affidavit, except where stated to be based on information and belief, in which case, I believe the information to be true.

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6. As I stated in my Third Affidavit, my concerns remain that 7-Eleven Canada / SEDCC are still using the Digiflex software to run their distribution business.

7. The deponent was not physically present before the commissioner but was linked with the commissioner utilizing video technology, and the process for remote commissioning of affidavits was utilized as described in the March 25, 2020, *Notice to the Profession and Public: Remote Commissioning of Affidavits/or use in Civil and Family Proceedings during the COVID-19 Pandemic*.

AFFIRMED BEFORE ME BY VIDEO )  
CONFERENCE at the City of Calgary, in the )  
Province of Alberta, this 2<sup>nd</sup> day of February, )  
2026. )



\_\_\_\_\_  
A Commissioner for Oaths in and for the Province  
of Alberta.

\_\_\_\_\_  
**Mohamad Mardukhi**

**HANI LEE**  
Commissioner for Oaths/Notary Public  
in and For the Province of Alberta

**Hani Lee**  
Student of Law

HL

**CERTIFICATE OF COMMISSIONER FOR OATHS**

CANADA )  
 )  
 ) **HANI LEE**  
PROVINCE OF ALBERTA )  
 )

I, Hani Lee, a Commissioner for Oaths/Notary Public, of the City of Calgary, in the Province of Alberta, Canada, state that I am satisfied that the process of swearing the Affidavit of Mohamad Z. Mardukhi, had to be done by remote video because it was impossible or unsafe for the deponent and the Commissioner to be physically present together.

CERTIFIED in the City of Calgary, in the Province of Alberta, this 2<sup>nd</sup> day of February, 2026.



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Hani Lee  
A Commissioner for Oaths in and for the Province  
of Alberta