This is the 1st affidavit
of Zaheer Awan in this case and
it was made August 27, 2026

NO. S2011355
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

TARIQ WAHEED and 0923063 B.C. LTD.

PLAINTIFFS

AND:

JM FOOD SERVICES LTD., FRESHSLICE HOLDINGS LTD., RFSP EQUIPMENT & OPERATING INC., A&M ENTERPRISE LTD., 1015214 B.C. LTD., RF FRANCHISING INC., and THE TRUSTEES OF THE FRSHSLICE FAMILY TRUST

DEFENDANTS

AFFIDAVIT

I, Zaheer Awan, Senior Bookkeeper, of c/o 1500 – 401 West Georgia Street, Vancouver, BC V6B 5A1, AFFIRM THAT:

1. I am a senior bookkeeper for the Freshslice group of companies noted as defendants in these proceedings (the "Freshslice Group") and as such have personal knowledge of the matters hereinafter deposed to, except where stated to be on information and belief, and where so stated I verily believe those matters to be true.

2. I have over 20 years of accounting / bookkeeping experience and I have worked with the Freshslice Group as a senior bookkeeper for approximately two and a half years. I am responsible for overseeing accounting functions, cash management, payroll administration, accounts payable, accounts receivable, banking relationships, and financial reporting for defendant companies.

Seizure of Freezing of Bank Accounts

3. Following the granting of the Receivership Order, the Receiver, McEown and Associates Ltd., proceeded to seize or freeze or caused to be seized or frozen a number of bank accounts of Defendants on or around August 19, 2026.

4. At the request of the Receiver, the Freshslice Group supplied information regarding the cashflows of the defendants on August 21, 2026. The Receiver requested cash flow requirements, including anticipated payments and anticipated receipts from our various accounts. I provided a snapshot of those details as of August 21, 2026; details that were based on operational needs and did not necessarily comply with an accounting method (cash or accrual). (**Exhibit "D"** below, page 8)

5. Based on the documents we supplied, the Receiver compared certain anticipated receipts with anticipated payments and determined that incoming revenues appear sufficient to cover expenditures.

6. The bank accounts seized or frozen by the Receiver are of the following entities within the Freshslice Group:

   a. A&M Enterprise Ltd. ("**A&M**"), which produces and sells dough, and operates corporate and joint-venture locations;

   b. 1015214 B.C. Ltd. ("**101**"), which builds out franchise locations, and supplies equipment and smallware;

   c. RF Franchising Inc. ("**RF**"), which oversees all franchising operations, from promotion of the franchise system to onboarding and training; and

   d. Freshslice Holdings Ltd. ("**FSH**"), receives revenue shares from 101, A&M and RF, and the surcharge revenue from franchisees.

   (collective, the "**Affected Entities**")

7. The following accounts have been seized or frozen by the Receiver:

   1) 101's Coast Capital Savings account ending in 9323, which held a balance between approximately $250,000 to $300,000. 1015214 B.C. Ltd. This account is used for vendor payments, wire transfers, payroll, and expenses associated with new store construction and equipment;

   2) A&M's Coast Capital Savings account ending in 9005, which held a balance over $2,500,000. This account is used for transactions in connection with production and distribution of dough, vendor payments, payroll, marketing expenses, and related operating costs.

   3) A&M's four Coast Capital Savings sub accounts. I am unsure of the balances in these accounts. These accounts are used as operating accounts for stores and belonged to corporate and joint-venture stores managed by A&M.

4) FH's TD Canada Trust account ending 6995, which held a balance over $200,000. This account is used for surcharge operations, office expenses, payroll, payments to subcontractors and other ordinary operating expenditures.
5) RF Franchising Inc.'s TD Canada Trust account ending in 7010, which held a balance over $1,000,000. This account is used for transactions in connection with franchise promotions and events, travel expenses, onboarding and training new franchisees, payroll, as well as payments to subcontractors.

(collectively, the "**Affected Accounts**").

8. The account balances indicated above are based on my recollection as we are no longer able to access the Affected Accounts through online banking.

9. The seizure or freezing of the Affected Accounts were done without first consulting with the Affected Entities regarding setting up alternative payment methods to satisfy the banking needs of the businesses.

10. As a result of the seizure of freezing of the Affected Accounts, the Affected Entities have suffered disruptions of their ordinary course of business, including the following:

a. payroll processing was disrupted;

b. vendor payments were delayed;

c. subcontractor payments were disrupted;

d. wire transfers could not be completed;

e. compliance and reporting obligations will potentially be affected; and

f. management and accounting staff were diverted from their ordinary responsibilities in that they were required to focus almost entirely on responding to the consequences of the seizure or freezing of the Affected Accounts.

11. At the time when the Affected Accounts were seized or frozen, the following payments had already been processed or were in transit:

a. Payroll for 101 in the amount of approximately $66,357.28;

b. Payroll for A&M in the amount of approximately $61,627.35; and

c. Vendor payments of approximately $49,682.80.

12. Additionally, previously scheduled payments were also disrupted and/or delayed, including:

a. Payments to subcontractors totaling approximately $24,401.23;

b. 101's payments to vendors totaling approximately $79,613.62; and

c. A&M's payments to vendors totalling approximately $217,031.36.

13. It is expected that the seizure or freezing of the Affected Accounts would result in various NSF charges, overdraft fees, vendor penalties, interest charges, or other consequential fees or charges.

Problems Regarding the Receiver's Enforcement Measures

14. The cash flow analysis conducted by the Receiver based on which the Receiver seized the Affected Accounts does not reflect how the Affected Entities actually operate.

15. The figures we provided to the Receiver were only a snapshot of the cashflows at a particular point in time.

16. Incoming funds are routinely used to satisfy obligations arising from previously earned revenues, to fund current operations, and to generate future revenues.

17. Accordingly, a comparison of cash inflows and outflows at a particular point in time does not provide a complete picture of operational requirements. Many expenses are not predictable weeks or months in advance and arise on short notice.

18. In reality, the Related Entities does not have access to the revenue generated by the Related Entities following the seizure, and even if the Related Entities had access, the revenue generated would have been insufficient to consistently meet their short-term obligations. As a result, the Related Entities required access to the funds seized or frozen by the Receiver in order to continue operating their businesses in the ordinary course.

19. The funds held in the Affected Accounts are not idle reserves or surplus capital. They constitute working capital required for ordinary business operations, which the Affected Companies rely on to:

a. pay employees;

b. purchase inventory and supplies;

c. produce and distribute dough;

d. fund new franchise development;

e. pay contractors and vendors;

f. satisfy tax obligations; and

g. meet other time-sensitive obligations.

20. I understand that the Receiver has proposed allowing the Related Entities to access only incoming funds and only for reasonable business expenses. I assume that would mean that the Related Entities would need to seek approval from the Receiver regarding each and every payment that the Related Entities need to make.

21. In my view, such a system would not work in practice.

22. The businesses generate a significant volume of transactions across multiple entities. Requiring repeated requests and approvals for expenditures would create delays and uncertainty. Such delays would materially impair the ability of the businesses to:

    a. process payroll;
    b. pay suppliers;
    c. support franchisees;
    d. complete store buildouts;
    e. satisfy regulatory obligations; and
    f. satisfy tax obligations including GST, PST, source deductions, and corporate income tax remittances.

23. The transaction-by-transaction approval process would create an operational bottleneck and would not permit the businesses to function efficiently.

24. Attached as **Exhibit "A"** are documents regarding interrupted payroll, vendor and subcontractor payments of the Related Entities.

25. Attached as **Exhibit "B"** is a schedule of anticipated receipts.

26. Attached as **Exhibit "C"** are payroll summary records describing the employee count and ongoing payroll obligations of 101, A&M and FSH.

The Proposed Security Arrangement

27. The Defendants have proposed posting $900,000 as interim security in exchange for the release of the Affected Accounts. Attached to this affidavit as **Exhibit "D"** is a copy of a 'with prejudice' email from Raj Wijesinghe, in house counsel for the Related Entities containing the proposal dated August 24, 2026, and a letter from Mr. Wijesinghe to the receiver's counsel and plaintiff's counsel sent on an earlier date regarding a proposal to post $900,000 as security in exchange for an interim stay of the actions of the receiver under the receivership order.

28. From a financial and operational perspective, this proposal would provide a practical mechanism to balance the competing interests of preserving the Receiver's position while allowing the businesses to continue operating.

AFFIRMED BEFORE ME
at Vancouver, British Columbia,
on August 27, 2026

A commissioner for taking affidavits
for British Columbia
RAJEEWA WIJESINGHE
Barrister & Solicitor
Province of British Columbia

ZAHEER AWAN

INTERRUPTED PAYROLL, VENDOR AND SUBCONTRACTOR PAYMENTS

Page	Amount	Description
1 thru 3	66,357.28	ADP notification that 101 payroll was not funded due to insufficient funds
4 thru 6	61,627.35	ADP notification that AM1 payroll was not funded due to insufficient funds
7 thru 8	619,523.57	Screenshot from bill payment manager of payments failed
9	3,854.40	Subcontractor bill + reimbursements
10	2,544.23	Subcontractor bill
11	2,324.70	Subcontractor bill
12	4,603.84	Subcontractor bill
13	4,321.16	Subcontractor bill
14	3,392.31	Subcontractor bill
15	2,808.58	Subcontractor reimbursements
	771,357.42	

This is Exhibit "A" referred to in the affidavit of Zaheer Awan sworn before me at Vancouver, BC this 27 day of August, 2026

A Commissioner for taking Affidavits within British Columbia

Outlook

ADP Canada Company Code V4Y7 Returned Debit Payroll URGENT ADP Canada Code d'entreprise V4Y7 - Débit retourné URGENT

From Canada_NSF@adp.com <Canada_NSF@adp.com>
Date Fri 8/21/2026 5:47 AM
To Freshslice Accounting (HO) <accounting@freshslice.com>
Cc Canada_NSF@adp.com <Canada_NSF@adp.com>

You don't often get email from canada_nsf@adp.com. Learn why this is important

La version française suit

Aug 21 2026
V4Y7
1015214 B.C. LTD.
Total Amount Due – Aug 21 2026 by 3 pm ET - $66357.28

Dear Valued Client,

This is a notification to advise that the debit for the payroll dated August 21 2026 was not funded due to insufficient funds.

Please note that ADP will not process any further payrolls or documents until a wire transfer is received to cover this indebtedness.

Payroll Pay Date	Company Code	Due Date	Amount Due
August 21 2026	V4Y7	Aug 21 2026 by 3 pm ET	$66357.28

Important note: Wired funds are the only payment accepted. If we receive any other type of payment, your account with ADP will be on hold for 10 business days. Please contact ADP immediately if there are any delays with remitting payment.

Client default of funding terms is subject to a service fee as outlined in your contract under Service Terms & Conditions which will be billed on your next payroll run or within 30 days.

Please send payment via wire transfer using the instructions below:

Our Bank:
Royal Bank of Canada
200 Bay Street
Main floor
Toronto, ON
M5H 1C4

Beneficiary:
ADP Canada Co.
16th Floor
3250 Bloor Street West
Etobicoke, ON
M8X 2X9

Bank Number: 003
Transit: 00002
Account Number: 1267848
Swift Code (U.S. CLIENTS ONLY): ROYCCAT2

Please send wire confirmation and the NSF reason to Canada_NSF@adp.com**.**

Thank you for your prompt attention to this matter.

ADP NSF Team
Canada_NSF@adp.com

The English version precedes

août 21 2026
V4Y7
1015214 B.C. LTD.
Montant total exigible – août 21 2026 avant 15 h (HE) – 66357.28 $

Cher client,

La présente notification a pour but de vous informer que le débit relatif à la paie en date du août 21 2026 n'a pas été prélevé en raison d'une insuffisance de fonds.

Veuillez noter qu'ADP ne traitera aucune autre paie ni aucun autre document avant de recevoir un virement de fonds pour couvrir cette dette.

Date de versement de la paie	**Code d'entreprise**	**Date d'échéance**	**Montant exigible**
août 21 2026	V4Y7	août 21 2026 avant 15 h (HE)	66357.28 $

Remarque importante : Les virements de fonds sont le seul mode de paiement accepté. Si nous recevons tout autre type de paiement, votre compte ADP sera suspendu pendant 10 jours ouvrables. Veuillez communiquer immédiatement avec ADP en cas de retard concernant le versement du paiement.

Le non-respect des modalités de financement entraîne des frais de service, comme l'indiquent les conditions générales de service de votre contrat, qui seront facturés lors de votre prochain traitement de paie ou dans un délai de 30 jours.

Veuillez envoyer le paiement au moyen d'un virement de fonds en suivant les instructions ci-dessous :

Notre banque : **Bénéficiaire :**

Royal Bank of Canada
200 Bay Street
Main floor
Toronto, ON
M5H 1C4

ADP Canada Co.
16th Floor
3250 Bloor Street West
Etobicoke, ON
M8X 2X9

Numéro de la banque : 003
Transit : 00002
Numéro de compte : 1267848
Code SWIFT (CLIENTS AUX ÉTATS-UNIS SEULEMENT) : ROYCCAT2

Veuillez envoyer la confirmation du virement de fonds et la raison de l'insuffisance de fonds à l'adresse Canada_NSF@adp.com.

Nous vous remercions de porter une attention immédiate à cette situation.

Équipe des comptes-clients avec insuffisance de fonds d'ADP
Canada_NSF@adp.com

Outlook

Fw: ADP Canada Company Code 6DSH Returned Debit Payroll URGENT ADP Canada Code d'entreprise 6DSH - Débit retourné URGENT

From Frank Alexander <frank@freshslice.com>
Date Fri 8/21/2026 9:26 AM
To Freshslice Accounting (HO) <accounting@freshslice.com>

Frank Alexander
Director of Construction & Project Management

T: +1 604-251-7444 ext 109
M: +1 604-724-9035
E: frank@freshslice.com
W: www.freshslice.com

Global Headquarters
1610 Ingleton Ave, 2nd Floor, Burnaby, BC V5C 5R9

From: Canada_NSF@adp.com <Canada_NSF@adp.com>
Sent: August 21, 2026 05:46
To: Frank Alexander <frank@freshslice.com>; Tamila Khayrullaeva <tamila@freshslice.com>
Cc: Canada_NSF@adp.com <Canada_NSF@adp.com>
Subject: ADP Canada Company Code 6DSH Returned Debit Payroll URGENT ADP Canada Code d'entreprise 6DSH - Débit retourné URGENT

Some people who received this message don't often get email from canada_nsf@adp.com. Learn why this is important

La version française suit

Aug 21 2026
6DSH
A & M ENTERPRISE LTD.
Total Amount Due – Aug 21 2026 by 3 pm ET - $61627.35

Dear Valued Client,

This is a notification to advise that the debit for the payroll dated August 21 2026 was not funded due to insufficient funds.

Please note that ADP will not process any further payrolls or documents until a wire transfer is received to cover this indebtedness.

Payroll Pay Date	Company Code	Due Date	Amount Due
August 21 2026	6DSH	Aug 21 2026 by 3 pm ET	$61627.35

Important note: Wired funds are the only payment accepted. If we receive any other type of payment, your account with ADP will be on hold for 10 business days. Please contact ADP immediately if there are any delays with remitting payment.

Client default of funding terms is subject to a service fee as outlined in your contract under Service Terms & Conditions which will be billed on your next payroll run or within 30 days.

Please send payment via wire transfer using the instructions below:

Our Bank:
Royal Bank of Canada
200 Bay Street
Main floor
Toronto, ON
M5H 1C4

Beneficiary:
ADP Canada Co.
16th Floor
3250 Bloor Street West
Etobicoke, ON
M8X 2X9

Bank Number: 003
Transit: 00002
Account Number: 1267848
Swift Code (U.S. CLIENTS ONLY): ROYCCAT2

Please send wire confirmation and the NSF reason to Canada_NSF@adp.com.

Thank you for your prompt attention to this matter.

ADP NSF Team
Canada_NSF@adp.com

The English version precedes

août 21 2026
6DSH
A & M ENTERPRISE LTD.
Montant total exigible – août 21 2026 avant 15 h (HE) – 61627.35 $

Cher client,

La présente notification a pour but de vous informer que le débit relatif à la paie en date du août 21 2026 n'a pas été prélevé en raison d'une insuffisance de fonds.

Veuillez noter qu'ADP ne traitera aucune autre paie ni aucun autre document avant de recevoir un virement de fonds pour couvrir cette dette.

Date de versement de la paie	Code d'entreprise	Date d'échéance	Montant exigible
août 21 2026	6DSH	août 21 2026 avant 15 h (HE)	61627.35 $

Remarque importante : Les virements de fonds sont le seul mode de paiement accepté. Si nous recevons tout autre type de paiement, votre compte ADP sera suspendu pendant 10 jours ouvrables. Veuillez communiquer immédiatement avec ADP en cas de retard concernant le versement du paiement.

Le non-respect des modalités de financement entraîne des frais de service, comme l'indiquent les conditions générales de service de votre contrat, qui seront facturés lors de votre prochain traitement de paie ou dans un délai de 30 jours.

Veuillez envoyer le paiement au moyen d'un virement de fonds en suivant les instructions ci-dessous :

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Toronto, ON
M5H 1C4

Bénéficiaire :
ADP Canada Co.
16th Floor
3250 Bloor Street West
Etobicoke, ON
M8X 2X9

Numéro de la banque : 003
Transit : 00002
Numéro de compte : 1267848
Code SWIFT (CLIENTS AUX ÉTATS-UNIS SEULEMENT) : ROYCCAT2

Veuillez envoyer la confirmation du virement de fonds et la raison de l'insuffisance de fonds à l'adresse Canada_NSF@adp.com.

Nous vous remercions de porter une attention immédiate à cette situation.

Équipe des comptes-clients avec insuffisance de fonds d'ADP
Canada_NSF@adp.com

REPORT FROM BILL MANAGER - BILLS FAILED AND DELAYED

Entity	Bill Status	Bill Created At Date	Bill Invoice Date	Bill Due Date	Bill Payment Status	Bill Payment Date	Bill Total	Bill Reference	Bill Vendor Name
AM1	PAYMENT_FAILED	2026-07-29	2026-07-27	2026-08-26	FAILED	2026-08-18	43.00	873224	Mill Creek Coffee Company
AM1	PAYMENT_FAILED	2026-07-29	2026-07-26	2026-08-25	FAILED	2026-08-18	5,670.00	102R031828	Bell Media Inc.
AM1	PENDING_PAYMENT	2026-07-31	2026-07-29	2026-08-28	IN_PROGRESS	2026-08-24	55.91	BM158336	1307386 B.C. LTD. DBA Summit Tools
AM1	PENDING_PAYMENT	2026-08-20	2026-08-19	2026-08-25	SCHEDULED	2026-08-26	16,730.77	INV621829	FE Ingredients Inc.
AM1	PENDING_APPROVAL	2026-08-24	2026-06-30	2026-07-30			1,350.50	692570	Maple Leaf Disposal
AM1	PENDING_APPROVAL	2026-08-21	2026-08-05	2026-09-04			4,577.88	72680896	Snow Cap Enterprises Ltd
AM1	PENDING_APPROVAL	2026-08-20	2026-07-29	2026-08-28			7,526.44	72677203	Snow Cap Enterprises Ltd
AM1	PENDING_APPROVAL	2026-08-20	2026-07-23	2026-08-22			7,270.11	72674021	Snow Cap Enterprises Ltd
AM1	PENDING_APPROVAL	2026-08-20	2026-08-11	2026-09-10			5,466.50	72684051	Snow Cap Enterprises Ltd
AM1	PENDING_APPROVAL	2026-08-20	2026-07-31	2026-08-30			1,557.11	72678801	Snow Cap Enterprises Ltd
AM1	PENDING_APPROVAL	2026-08-20	2026-08-05	2026-09-04			21,627.25	RINV032643	Rogers Foods Ltd.
AM1	PENDING_APPROVAL	2026-08-20	2026-07-24	2026-08-23			22,877.25	RINV032211	Rogers Foods Ltd.
AM1	PENDING_APPROVAL	2026-08-20	2026-07-30	2026-08-29			22,364.41	RINV032413	Rogers Foods Ltd.
AM1	PENDING_APPROVAL	2026-08-17	2026-06-30	2026-07-30			1,004.64	134384	Tonertech
AM1	PENDING_APPROVAL	2026-08-13	2026-04-29	2026-05-29			5,418.00	20001224464	Day & Ross Inc.
AM1	PENDING_APPROVAL	2026-08-13	2026-04-04	2026-05-04			8,390.25	20001456323	Day & Ross Inc.
AM1	PENDING_APPROVAL	2026-07-31	2026-07-29	2026-08-13			8,435.00	1073667	North American Flours Mills Inc.
AM1	PENDING_APPROVAL	2026-07-28	2026-07-27	2026-08-26			1,495.06	18513750	ULINE Canada Corporation
AM1	PENDING_APPROVAL	2026-07-22	2026-07-21	2026-08-20			736.51	18483069	ULINE Canada Corporation
AM1	PENDING_APPROVAL	2026-07-17	2026-07-16	2026-08-15			1,830.08	18458239	ULINE Canada Corporation
AM1	PENDING_APPROVAL	2026-07-16	2026-07-15	2026-08-14			5,050.50	17050	Canada Printing Center Inc.
AM1	PENDING_APPROVAL	2026-07-16	2026-07-15	2026-08-14			157.50	17049	Canada Printing Center Inc.
AM1	PENDING_APPROVAL	2026-07-13	2026-07-10	2026-08-09			3,105.97	945558	Enterprise Paper Co. Ltd.
AM1	PENDING_APPROVAL	2026-07-08	2026-06-30	2026-07-30			387.24	10719886	Sterling Backcheck Canada Corp.
AM1	PENDING_APPROVAL	2026-06-08	2026-06-08	2026-07-08			7,213.80	SIP141533	Insight Touch Inc.
101	PENDING_APPROVAL	2026-08-20	2026-06-04	2026-07-04			247.80	93241	Paragon Food Equipment
101	PENDING_APPROVAL	2026-08-20	2026-03-12	2026-04-11			453.60	92449	Paragon Food Equipment
101	PENDING_APPROVAL	2026-08-20	2026-05-27	2026-06-01			20,160.00	25121903A	ADD Printing & Packaging Inc
101	PENDING_APPROVAL	2026-07-27	2026-07-24	2026-08-23			414.29	1183192	Nella Cutlery & Food Equipment Company
101	PENDING_APPROVAL	2026-07-20	2026-07-18	2026-08-17			7,714.65	1181928	Nella Cutlery & Food Equipment Company
101	PENDING_APPROVAL	2026-07-14	2026-07-13	2026-08-12			169.60	1180892	Nella Cutlery & Food Equipment Company
101	PENDING_APPROVAL	2026-07-14	2026-07-13	2026-08-12			144.90	1180891	Nella Cutlery & Food Equipment Company
101	PENDING_APPROVAL	2026-07-10	2026-07-09	2026-08-08			718.20	1180409	Nella Cutlery & Food Equipment Company
101	PENDING_APPROVAL	2026-06-17	2026-06-16	2026-07-16			21,279.30	1176149	Nella Cutlery & Food Equipment Company
101	PENDING_APPROVAL	2026-05-22	2026-05-21	2026-06-20			24,951.08	1171506	Nella Cutlery & Food Equipment Company
101	DRAFT	2026-08-21	2026-08-20	2026-09-19			648.00	1187052	Nella Cutlery & Food Equipment Company
101	DRAFT	2026-08-21	2026-08-20	2026-09-19			648.00	1187052	Nella Cutlery & Food Equipment Company
101	DRAFT	2026-08-21	2026-08-20	2026-09-19			640.00	1187052	Nella Cutlery & Food Equipment Company
101	DRAFT	2026-08-18	2026-08-17	2026-08-18			40,367.50	34207	Nella Cutlery & Food Equipment Company
101	DRAFT	2026-08-18	2026-08-17	2026-08-18			40,367.50	34207	Nella Cutlery & Food Equipment Company
101	DRAFT	2026-08-14	2026-08-10	2026-09-09			2,676.11	32015285	Olympia Tile International Inc.
101	DRAFT	2026-08-14	2026-08-10	2026-09-09			2,676.11	32015285	Olympia Tile International Inc.

REPORT FROM BILL MANAGER - BILLS FAILED AND DELAYED

Entity	Bill Status	Bill Created At Date	Bill Invoice Date	Bill Due Date	Bill Payment Status	Bill Payment Date	Bill Total	Bill Reference	Bill Vendor Name
101	DRAFT	2026-08-14	2026-08-10	2026-09-09			2,676.11	32015285	Olympia Tile International Inc.
101	DRAFT	2026-08-14	2026-08-10	2026-09-09			2,676.11	32015285	Olympia Tile International Inc.
101	DRAFT	2026-08-07	2026-08-04	2026-09-03			1,270.06	32011972	Olympia Tile International Inc.
101	DRAFT	2026-08-07	2026-08-04	2026-09-03			1,270.06	32011972	Olympia Tile International Inc.
101	DRAFT	2026-08-07	2026-08-04	2026-09-03			1,270.06	32011972	Olympia Tile International Inc.
101	DRAFT	2026-08-06	2026-08-04	2026-09-03			210.00	93783	Paragon Food Equipment
101	DRAFT	2026-08-04	2026-07-31	2026-08-30			40,880.00	1184633	Nella Cutlery & Food Equipment Company
101	DRAFT	2026-08-04	2026-07-31	2026-08-30			40,880.00	1184633	Nella Cutlery & Food Equipment Company
101	DRAFT	2026-07-29	2026-07-29	2026-08-28			1,587.00	71599	Piedmont Sheet Metal (1997) Ltd.
101	DRAFT	2026-07-29	2026-07-29	2026-08-28			1,587.00	71599	Piedmont Sheet Metal (1997) Ltd.
101	DRAFT	2026-07-29	2026-07-29	2026-08-28			11,623.50	71565	Piedmont Sheet Metal (1997) Ltd.
101	DRAFT	2026-07-29	2026-05-06	2026-07-29			39,775.00	32169	Nella Cutlery & Food Equipment Company
101	DRAFT	2026-07-29	2026-06-24	2026-07-29			39,775.00	32760	Nella Cutlery & Food Equipment Company
101	DRAFT	2026-07-29	2026-07-06	2026-08-05			167.50	1174438	Nella Cutlery & Food Equipment Company
101	DRAFT	2026-07-23	2026-07-20	2026-08-19			1,196.89	32003932	Olympia Tile International Inc.
101	DRAFT	2026-07-23	2026-07-20	2026-08-19			1,196.89	32003932	Olympia Tile International Inc.
101	DRAFT	2026-07-23	2026-07-20	2026-08-19			1,196.89	32003932	Olympia Tile International Inc.
101	DRAFT	2026-07-22	2026-07-22	2026-07-22			40,193.00	33634	Nella Cutlery & Food Equipment Company
101	DRAFT	2026-07-22	2026-07-22	2026-07-22			40,193.00	33634	Nella Cutlery & Food Equipment Company
101	DRAFT	2026-07-13	2026-07-07	2026-08-06			439.02	31996222	Olympia Tile International Inc.
101	DRAFT	2026-07-02	2026-06-30	2026-07-21			84.00	6933	Design2Web IT Inc.
101	DRAFT	2026-06-29	2026-06-26	2026-07-26			2,494.27	31991064	Olympia Tile International Inc.
101	DRAFT	2026-06-29	2026-06-26	2026-07-26			2,494.27	31991064	Olympia Tile International Inc.
101	DRAFT	2026-06-29	2026-06-26	2026-07-26			2,494.27	31991064	Olympia Tile International Inc.
101	DRAFT	2026-06-29	2026-06-26	2026-07-26			2,494.27	31991064	Olympia Tile International Inc.
101	DRAFT	2026-06-23	2026-06-19	2026-07-19			2,451.59	31986459	Olympia Tile International Inc.
101	DRAFT	2026-06-23	2026-06-19	2026-07-19			2,451.59	31986459	Olympia Tile International Inc.
101	DRAFT	2026-06-23	2026-06-19	2026-07-19			2,451.59	31986459	Olympia Tile International Inc.
101	DRAFT	2026-06-19	2026-06-16	2026-07-16			2,346.87	31986593	Olympia Tile International Inc.
101	DRAFT	2026-06-19	2026-06-16	2026-07-16			2,346.87	31986593	Olympia Tile International Inc.
101	DRAFT	2026-06-19	2026-06-16	2026-07-16			2,346.87	31986593	Olympia Tile International Inc.
101	DRAFT	2026-04-06	2026-03-31	2026-04-21			199.50	6783	Design2Web IT Inc.
101	DRAFT	2026-03-02	2026-02-28	2026-03-21			84.00	6656	Design2Web IT Inc.
							619,523.57		

INVOICE

RYAN FOOD SERVICES LTD
5128 JOYCE ST
VANCOUVER BC V5R 4H1
Telephone: 604-568-4003

AUG 17 2026

5

BILL TO

RF Franchising Inc.
1610 Ingleton Ave. Burnaby, BC, Canada
604 250 74 44

DESCRIPTION	QTY	UNIT PRICE	TOTAL
3 AUG TO AUG 9	40	$45	1800.00
10 AUG TO AUG 16	40	$45	1800.00
PARKING		54.25	54.25
COSTCO		20.15	20.15
			0.00
			0.00

Remarks / Payment Instructions:

SUBTOTAL	3600.00
TOTAL TAX (GST)	180
Balance Due	**$3854.4 -**

OK as per Contract

LoanHub

#12

21/08/26

1464973 B.C. Ltd.
14670 76A Avenue
Surrey BC
V3S 2P4

INVOICE

00066

Bill To:
A&M Enterprise Ltd.
1610 INGLETON AVE,
BURNABY BC
V5C5R9

Date:	Aug 6, 2026
Due Date:	Aug 6, 2026
PO Number:	00066
Balance Due:	**$2,544.23**

Item	Quantity	Rate	Amount
Consultation Services	1	$2,423.08	$2,423.08

Subtotal:	$2,423.08
Tax (5%):	$121.15
Total:	$2,544.23

OK as per Contract

Notes:
Period: Aug 03, 2026 to Aug 16, 2026

Terms:
GST # 797098829 RT0001

Loanhub
#06
21/08/26

ABIYOT DINKU ASFAW
6948 144 ST SURREY BC
SURREY BC V3W 5R9
778 707 9212
747937686 RT0001

INVOICE

INVOICE TO
1015214 BC LTD.
2-1610 Ingleton Avenue, Burnaby BC, V5C 5R9.

INVOICE #	INVOICE # 16
DATE	Aug 16 2026
DUE DATE	
TERMS	Payroll 16

DESCRIPTION	QTY	RATE	AMOUNT
Regaular Work Hours(3 AUG TO 16 AUG 2026) (Please separate these from Sick/vacation hours)	82	27.00	$2214.00
Vacation Hours(if any)(Date) Description of item	0	0	$0.00
Sick Hours(if any)(Date) Description of item	0	0	$0.00
Item name Description of item	0	0	$0.00

MESSAGE

#08
21/01/21

SUBTOTAL	$2214.00
DISCOUNT	$0.00
TAX	$110.70
TOTAL	$0.00
BALANCE DUE	**$2324.70**

Hani.

This invoice is brought to you by quickbooks

AOF DESIGN STUDIO

PO Box 31031 Drive - Thru Parcel Centre Richmond Hill, ON, L4C 0V3

Client :	Invoice Number: 12026	
1015214 B.C. LTD.		
Address:	Date:	06.08.2026
1610 Ingleton Ave, Burnaby BC, V5C 5R9	Discription	Amount
Item		
259 Hired Avenue -	Phase 2 - Design Development	$ 2,192.30
Unit 105 - 743 Railway Street, Canmore, Alberta	Phase 2 - Design development	$ 1,192.31
1975 East 41st	Design changes - rev to gas	$ 1,000.00
	Sub-Total	$4,384.61
Print	GST	$ 219.23
	Total	**$4,603.84**

Notes:
1. Please make all cheques payable to AOF DESIGN STUDIO INC
2. Total amount is due upon receipt
3. GST/HST# 740015088RT0001

Paid #010

21/08/26

Jameson Sales & Consulting Inc

INVOICE

46

Bill To:
A&M Enterprise Ltd

Date:	Aug 3, 2026
PO Number:	00046
Balance Due:	**CA$4,321.16**

Item	Quantity	Rate	Amount
Sales and Consulting Services	1	CA$4,115.39	CA$4,115.39

Subtotal:	CA$4,115.39
Tax (5%):	CA$205.77
Total:	CA$4,321.16

OK as per contract. Meyl

Notes:
GST # 798533766RT0001

#09
21/08/26

HAMID ABBASPOUR
402 7095 STRIDE AVE
BURNABY BC V3N 1T3
604 505 7676
78610 4679 RT0001

INVOICE

INVOICE TO
1015214 BC LTD.
2-1610 Ingleton Avenue, Burnaby BC, V5C 5R9.

INVOICE # INVOICE # 16
DATE 16 Aug 2026
DUE DATE
TERMS Payroll 16

DESCRIPTION	QTY	RATE	AMOUNT
Regaular Work Hours(3 Aug to 16 Aug 2026) (Please separate these from Sick/vacation hours)	80	0	$3230.77
Vacation Hours(if any)(Date) Description of item	0	0	$0.00
Sick Hours(if any)(Date) Description of item	0	0	$0.00
Item name Description of item	0	0	$0.00

MESSAGE

#07
21/08/26

SUBTOTAL	$3230.77
DISCOUNT	$0.00
TAX	$161.54
TOTAL	$0.00
BALANCE DUE	$3392.31

HGM

This invoice is brought to you by intuit quickbooks

Name:	HAMID ABBASPOUR		Pay Period:		
Date	**Purchase Vendor**	**Reason**	**Cost** (including PST)	**GST**	**Total Amount**
Aug 18 2026	SAVE GAS	GAS	$47.62	$2.38	$50.00
Aug 10 2026	wholesale	oil	$2,579.40		$2,579.40
Aug 14 2026	canadian tire	Flding tablr	$171.18	$8.00	$179.18
					$0.00
					$0.00
					$0.00
					$0.00
					$0.00
					$0.00
					$0.00
					$0.00
					$0.00
					$0.00
					$0.00
					$0.00
					$0.00
					$0.00
					$0.00
					$0.00
		Total	$2,798.20	$10.38	$2,808.58

Hamid

SCHEDULE OF ANTICIPATED RECEIPTS

Entity	Amount	Reference
AM1	101,648.39	Page 1
AM1	138,720.00	Page 2
AM1	124,013.89	Page 3
FSH	148,826.95	Page 4
RF	18,875.00	Page 5
RF	38,875.00	Page 5
RF	57,750.00	Page 5
RF	45,937.50	Page 6

This is Exhibit "B" referred to in the affidavit of Zaheer Awan sworn before me at Vancouver, BC this 27 day of August, 2026

A Commissioner for taking Affidavits within British Columbia

AP12E05R2 SYSCO VANCOUVER, A DIV OF SYSCO CANADA, INC.
26/07/31 14:13:27 Vendor EFT Remittance Report Page 0001
Vendor #: 77928200
A&M ENTERPRISE LTD.
1610 INGLETON AVE

BURNABY BC V5C 5R9

Payment #: 0180306

PO No	Inv Date	Invoice #	Gross Amount	Discount	Net Paid Amt
0000000	7/29/2026	VAR1751251	40879.61-		40879.61-
3163919	7/16/2026	0448163919	52224.00		52224.00
3150449	7/17/2026	0448150449	90304.00		90304.00
Vendor 77928200		Total:	101648.39		101648.39

SYSCO Food Services Inc.
SYSCO Food Services Inc.

P12E05R2 SYSCO VANCOUVER, A DIV OF SYSCO CANADA, INC.
6/08/14 15:15:38 Vendor EFT Remittance Report Page 0001
endor #: 77928200
&M ENTERPRISE LTD.
610 INGLETON AVE

URNABY BC V5C 5R9

Payment #: 0181018

PO No	Inv Date	Invoice #	Gross Amount	Discount	Net Paid Amt
169673	7/30/2026	0448169673	48416.00		48416.00
169671	7/31/2026	0448169671	90304.00		90304.00
endor 77928200		Total:	138720.00		138720.00

SYSCO Food Services Inc.
SYSCO Food Services Inc.

AP12E05R2
26/08/12 15:30:43
Vendor #: 77928200
A&M ENTERPRISE LTD.
1610 INGLETON AVE

SYSCO VANCOUVER, A DIV OF SYSCO CANADA, INC.
Vendor EFT Remittance Report

BURNABY BC V5C 5R9

Payment #: 0180899

PO No	Inv Date	Invoice #	Gross Amount	Discount	Net Paid Amt
3169670	7/29/2026	0448169670	90848.00		90848.00
3177594	7/17/2026	0448177594	33165.89		33165.89
Vendor 77928200		Total:	124013.89		124013.89

SYSCO Food Services Inc.

SYSCO Food Services Inc.

AP12E05R2
26/08/19 15:25:55
Vendor #: 81685201
FRESHSLICE HOLDINGS LTD
2-1610 INGLETON AVE

SYSCO VANCOUVER, A DIV OF SYSCO CANADA, INC.
Vendor EFT Remittance Report

BURNABY BC V5C 5R9

Payment #: 0181276

PO No	Inv Date	Invoice #	Gross Amount	Discount	Net Paid Amt
0000000	8/07/2026	0807265201	148826.95		148826.95
Vendor 81685201		Total:	148826.95		148826.95

SYSCO Food Services Inc.

SYSCO Food Services Inc.

10358 (0521)

THIS DOCUMENT IS PRINTED ON WATERMARKED PAPER. SEE BACK FOR INSTRUCTIONS.

The Toronto-Dominion Bank

2025 Prince Of Wales Drive Regina SK S4V 3A3

14037514

Purchaser RAMNEEK KAUR

DATE 2026-08-08 YYYYMMDD

Transit-Serial No. 7596-14037514

Pay to the Order of R.F. FRANCHISING INC. $ *****18,875.00

EIGHTEEN THOUSAND EIGHT HUNDRED SEVENTY FIVE********************00/100 Canadian Dollars

Authorized signature required for amounts over CAD $5,000.00

Re

The Toronto-Dominion Bank
Toronto, Ontario
Canada M5K 1A2

Authorized Officer — S7026 Number

Countersigned

OUTSIDE CANADA NEGOTIABLE BY CORRESPONDENTS AT THEIR BUYING RATE FOR DEMAND DRAFTS ON CANADA

⑈14037514⑈ ⑆09612⑉004⑆ ⑉3808⑈

78578563 5-516

Royal Bank of Canada
Banque Royale du Canada

950 VICTORIA AVE E
REGINA, SK

DATE 2026 08 08 Y/A M/M D/J

PAY TO THE ORDER OF / PAYEZ À L'ORDRE DE R. F. FRANCHISING INC. $38,875.00

EXACTLY $38,875 00 ¢ CANADIAN DOLLARS CANADIENS

AUTHORIZED SIGNATURE REQUIRED FOR AMOUNTS OVER $5,000.00 CANADIAN / SIGNATURE AUTORISÉE REQUISE POUR UN MONTANT EXCÉDANT 5,000.00 $ CANADIENS

RE/OBJET

PURCHASER NAME 10206092 SASKATCHEWAN LTD NOM DE L'ACHETEUR

AUTHORIZED SIGNATURE / SIGNATURE AUTORISÉE

PURCHASER ADDRESS ADRESSE DE L'ACHETEUR

COUNTERSIGNED / CONTRESIGNÉ

⑈78578563⑈ ⑆07218⑉003⑆ 099⑉013⑉5⑈

Scotiabank

CANADIAN DOLLAR DRAFT

402662

ABBOTSFORD, B.C
#100-2777 GLADWIN ROAD
ABBOTSFORD BRITISH COLUMBIA V2T 4V1

0000162-4

DATE 2026 08 08 Y Y Y Y M M D D

PAY TO ORDER OF R.F FRANCHISING INC. $ 57,750.00

SUM OF EXACTLY 57,750 DOLLARS ******************* 00/100 CANADIAN FUNDS

THE BANK OF NOVA SCOTIA

TO:
ANY BRANCH OF
THE BANK OF NOVA SCOTIA

AUTHORIZED OFFICER

AUTHORIZED OFFICER

Purchaser's Name: MR AMRINDER SINGH

⑈402662⑈ ⑆38562⑉002⑆ 00000⑉43 00240⑈

Scotiabank®

OUTGOING PAYMENT / TRANSFER SUMMARY RECEIPT

DATE 2026/08/21 | TIME 13:53:14

SENDING TRANSIT INFORMATION

NAME Lawson Heights Mall, Saskatoon, Sask.
ADDRESS 132 Primrose Drive
Saskatoon, Saskatchewan, S7K 3W6
TRANSIT 30718

SENDER'S REFERENCE NUMBER 0016755552

SENDER INFORMATION

NAME LINE 1 *102231964 SASKATCHEWAN CORP.
NAME LINE2
ADDRESS 254 Fast Lane
Saskatoon, Saskatchewan, Canada, S7W 0X2

HOME TELEPHONE (306)850-4969 WORK TELEPHONE

TRANSACTION INFORMATION

EFFECTIVE VALUE DATE 2026/08/21
CURRENCY AND AMOUNT OF TRANSFER

AMOUNT OF TRANSFER	45,937.50 CAD
EXCHANGE RATE	
CHARGES	98.87 CAD
TOTAL	46,036.37 CAD

DEBIT ACCOUNT NUMBER 307180266515

BENEFICIARY INFORMATION

NAME RF Franchising Inc.
ADDRESS 1610 Ingleton Ave , Floor 2
Burnaby, British Columbia, Canada, V5C 5R9

CREDIT ACCOUNT NUMBER 5277010
IBAN/CLABE (IF APPLICABLE)

☑ CREDIT WITH ADVICE ☐ NOTIFY AND PAY

INFORMATION TO BENEFICIARY

FRANCHISING FEE FOR MIDTOWN FRESH SLICE PIZZA

NOTIFY AND PAY DETAILS

BENEFICIARY BANK

NAME TD Canada Trust
ADDRESS 1933 Willingdon Ave
Burnaby, British Columbia, Canada, V5C 5J3

SWIFT/BIC TDOMCATTTOR

CUSTOMER COPY - PART 2

1521219 (12/25)

PAYROLL SUMMARY - EMPLOYEE COUNT AND PAYROLL OBLIGATIONS

Entity	ADP Pay Period (Biweekly)	Employee Count	Payroll Obligation	Reference
101	17	28		Page 1
101	17		66,229.50	Page 2
AM1	17	50		Page 3
AM1	17		61,431.98	Page 4
FSH	17	21		Page 5
FSH	17		63,111.24	Page 6
		99	190,772.72	

This is Exhibit "C" referred to in the affidavit of Zaheer Awan sworn before me at Vancouver, BC this 27 day of August, 2026

A Commissioner for taking Affidavits within British Columbia

COMPANY: V4Y7 1015214 B.C. LTD.

A D P C A N A D A C O.
P A Y R O L L T E C H N O L O G I E S

TOTALS RECAP REPORT -- COMPANY TOTALS

PAGE: 57
DATE: 2026-08-16
PP: 17

PROOF REPORT
OTHER STMNTS
REGISTER

THIS PAY DATE 2026-08-21

DED SCHEDULE 2 EARN SCHEDULE 2 STATUS ACTIVE

* * * * * * * * C O N T R O L S * * * * * * *

	SALARIES	RATES	ACTIVES
PREVIOUS	34269.24	518.9600	31
CHANGED			
PRESENT	34269.24	518.9600	31

COUNTERS

ERRORS	51
HASH	
TIME CDS	
CHANGE CDS	
ADJUSTMENT	36
RCDS ADDED	
RCDS TERMD	
ACTIV RCDS	31
VACAT RCDS	
INACT RCDS	1
TERMD RCDS	76
JOB TICKETS	23
EXCPTION HRS	
VACATION HRS	
SELF SRV DEP	
PRINTED DEPS	28
SELF SRV CHQ	
PRINTED CHQS	

* * * * * P A Y M E N T S * * * *

	NUMBER	AMOUNT
CHEQUES		
DEPOSIT	28	48998.55
US DEPS		
TOTAL	28	48998.55
DED DEPS		
SAV DEPS		

* * * * M E M O P A Y S * * * *

	NUMBER	AMOUNT
PREV.ADJ		
PAYOFFS		

* * * * * * * * * * * T A X A B L E S * * * * * * * * * * *

	CURRENT	THIS YEAR
CPP/QPP	59492.44	1360557.25
FED. INC.	60347.09	1380027.63
PROV INC.	60347.09	1380027.63
COMMISNS		
BENEFITS		
OTHER		
EI	60347.09	1380027.63
LUMP SUM		1538.40
PROVHLTH	60347.09	1380027.63
REG.PEN.		
TXB = 11	52103.93	1301628.80
TXB = 12		
TXB = 13		
TXB = 14		
TXB = 15		
QUE BEN		

* * * * * * * * * TAXABLES BREAKDOWN * * * * * * * * * *

	CURRENT	THIS YEAR
C.P.P.	59492.44	1360557.25
Q.P.P.		
EI EX QC	60347.09	1380027.63
EI IN QC		
QPIP		
QC HSF		
ON EHT		46166.81
BC EHT	60347.09	1333860.82
MB HET		
NLHAPSET		
NT EARNS		
NU EARNS		

* * * * I N P U T T O T A L S * * * *   * * * * P O S T I N G T O T A L S * * * * *

	CURRENT UNITS	ADJUSTMENT UNITS	ADJUSTMENT DOLLARS		UNPOSTED ADJUSTMENT	PREVIOUS DOLLARS	CURRENT DOLLARS	TOTAL DOLLARS
	1098.50	237.00	7351.59-	REGULAR			50380.86	50380.86
			1573.07	STAT HOL			1573.07	1573.07
	41.00			SICK HRS			2185.09	2185.09
			150.00	BONUS			150.00	150.00
VAC			2264.90	VAC PAY			2264.90	2264.90
			3183.38	VAC TERM			3183.38	3183.38
			1542.70	*EXP REIM			1542.70	1542.70
				AUTO VAC			609.79	609.79
	1139.50	237.00	1362.46	TOTAL			61889.79	61889.79
				GROSS EARN			60347.09	60347.09

COMPANY Totals

Pay Ending Date 16 Aug 2026

Pay Date 21 Aug 2026

	CURRENT		CURRENT & ADJUSTED		YEAR-TO-DATE	
	HOURS/UNITS	AMOUNT	HOURS/UNITS	AMOUNT	HOURS/UNITS	AMOUNT
Earnings		**61 889.79**		**61 889.79**		**1 453 690.23**
REGULAR	1 335.50	50 380.86	1 335.50	50 380.86	24 405.50	1 260 609.00
STAT HOL		1 573.07		1 573.07	158.92	9 693.85
SICK HRS	41.00	2 185.09	41.00	2 185.09	221.00	9 667.78
2ND RATE					32.00	1 615.36
STAT 1.5					65.50	1 825.95
BONUS		150.00		150.00		29 500.00
VAC PAY		2 264.90		2 264.90		50 362.07
VAC TERM		3 183.38		3 183.38		4 651.08
EXP REIM		1 542.70		1 542.70		72 124.20
RET A EL						1 538.40
NOTICE						1 404.00
AUTO VAC		609.79		609.79		10 698.54
Deductions		**19 068.39**		**19 068.39**		**456 775.65**
GOVT PEN		3 123.82		3 123.82		76 092.22
EI CONT		868.50		868.50		22 129.32
FEDL TAX		8 898.92		8 898.92		221 031.68
VAC ACCR		1 837.44		1 837.44		30 449.07
*CO CPP		3 123.82		3 123.82		76 092.22
*CO EI		1 215.89		1 215.89		30 981.14
GPEN BRK						
CPP/QPP		$66,229.50				75 676.22
CPP/QPP2						416.00

CURRENT

NET PAY
48 998.55

GROSS PAID EARNINGS
60 347.09

TAXES & DEDUCTIONS
12 891.24

PROOF REPORT
OTHER STMNTS
REGISTER

THIS PAY DATE	DED SCHEDULE	EARN SCHEDULE	STATUS
2026-08-21	2	2	ACTIVE

* * * * * * * * C O N T R O L S * * * * * * *

	SALARIES	RATES	ACTIVES
PREVIOUS	3846.15	1423.1300	74
CHANGED		54.7500	3
PRESENT	3846.15	1477.8800	77

COUNTERS

ERRORS	139
HASH	
TIME CDS	
CHANGE CDS	53
ADJUSTMENT	41
RCDS ADDED	3
RCDS TERMD	
ACTIV RCDS	77
VACAT RCDS	
INACT RCDS	3
TERMD RCDS	314
JOB TICKETS	49
EXCPTION HRS	
VACATION HRS	
SELF SRV DEP	
PRINTED DEPS	50
SELF SRV CHQ	
PRINTED CHQS	

* * * * * P A Y M E N T S * * * *

	NUMBER	AMOUNT
CHEQUES		
DEPOSIT	50	48296.86
US DEPS		
TOTAL	50	48296.86
DED DEPS		
SAV DEPS		

* * * * * M E M O P A Y S * * * *

	NUMBER	AMOUNT
PREV.ADJ		
PAYOFFS		

* * * * * * * * * * * * T A X A B L E S * * * * * * * * * * *

	CURRENT	THIS YEAR
CPP/QPP	54901.18	989731.30
FED. INC.	57301.18	1049067.06
PROV INC.	57301.18	1049067.06
COMMISNS		
BENEFITS		
OTHER		
EI	57301.18	1049067.06
LUMP SUM		
PROVHLTH	57301.18	1049067.06
REG.PEN.		
TXB = 11	55553.47	1018951.95
TXB = 12		
TXB = 13		
TXB = 14		
TXB = 15		
QUE BEN		

* * * * * * * * * * TAXABLES BREAKDOWN * * * * * * * * * *

	CURRENT	THIS YEAR
C.P.P.	54901.18	989731.30
Q.P.P.		
EI EX QC	57301.18	1049067.06
EI IN QC		
QPIP		
QC HSF		
ON EHT	4980.20	166638.38
BC EHT	46105.42	803245.72
MB HET	6215.56	79182.96
NLHAPSET		
NT EARNS		
NU EARNS		

* * * * I N P U T T O T A L S * * * *   * * * * P O S T I N G T O T A L S * * * * *

	CURRENT UNITS	ADJUSTMENT UNITS	ADJUSTMENT DOLLARS		UNPOSTED ADJUSTMENT	PREVIOUS DOLLARS	CURRENT DOLLARS	TOTAL DOLLARS
	2309.91			REGULAR			50313.64	50313.64
			1578.92	STAT HOL			1578.92	1578.92
		81.34	2270.81	STAT 1.5			2270.81	2270.81
			526.10	BONUS			526.10	526.10
VAC			864.00	VAC PAY			864.00	864.00
				AUTO VAC			1747.71	1747.71
	2309.91	81.34	5239.83	TOTAL			57301.18	57301.18
				GROSS EARN			57301.18	57301.18
				NET EARN			57301.18	57301.18

* NOT IN GROSS. = NOT IN GROSS OR NET.

COMPANY	Totals	Pay Ending Date 16 Aug 2026	Pay Date 21 Aug 2026

	CURRENT		CURRENT & ADJUSTED		YEAR-TO-DATE	
	HOURS/UNITS	AMOUNT	HOURS/UNITS	AMOUNT	HOURS/UNITS	AMOUNT
Earnings		57 301.18		57 301.18		1 051 050.99
REGULAR	2 309.91	50 313.64	2 309.91	50 313.64	42 900.34	975 707.01
STAT HOL		1 578.92		1 578.92	17.55	13 757.24
SICK HRS					80.50	1 972.83
STAT 1.5	81.34	2 270.81	81.34	2 270.81	398.75	15 679.42
BONUS		526.10		526.10		5 800.98
VAC PAY		864.00		864.00		6 034.47
EXP REIM						1 983.93
AUTO VAC		1 747.71		1 747.71		30 115.11
Deductions		13 636.55		13 636.55		256 935.81
GOVT PEN		2 877.96		2 877.96		52 002.40
EI CONT		894.87		894.87		16 132.68
FEDL TAX		5 231.49		5 231.49		86 424.73
ADVANCE						900.00
VAC ACCR		501.43		501.43		26 887.88
*CO CPP		2 877.96		2 877.96		52 002.40
*CO EI		1 252.84		1 252.84		22 585.72

CURRENT

NET PAY
48 296.86

GROSS PAID EARNINGS
57 301.18

TAXES & DEDUCTIONS
9 004.32

$61,431.98

TOTALS RECAP REPORT -- COMPANY TOTALS

	THIS PAY DATE	DED SCHEDULE	EARN SCHEDULE	STATUS
PROOF REPORT OTHER STMNTS REGISTER	2026-08-21	2	2	ACTIVE

******** CONTROLS ********

	SALARIES	RATES	ACTIVES
PREVIOUS	43780.66	311.3300	26
CHANGED		1.0000	
PRESENT	43780.66	312.3300	26

COUNTERS

ERRORS	34
HASH	
TIME CDS	
CHANGE CDS	8
ADJUSTMENT	14
RCDS ADDED	
RCDS TERMD	
ACTIV RCDS	26
VACAT RCDS	
INACT RCDS	1
TERMD RCDS	32
JOB TICKETS	14
EXCPTION HRS	
VACATION HRS	
SELF SRV DEP	
PRINTED DEPS	21
SELF SRV CHQ	
PRINTED CHQS	

***** PAYMENTS ****

	NUMBER	AMOUNT
CHEQUES		
DEPOSIT	21	44817.90
US DEPS		
TOTAL	21	44817.90
DED DEPS		
SAV DEPS		

**** MEMO PAYS ****

	NUMBER	AMOUNT
PREV.ADJ		
PAYOFFS		

*********** TAXABLES ************

	CURRENT	THIS YEAR
CPP/QPP	57045.30	870782.01
FED.INC.	57045.30	870782.01
PROV INC.	57045.30	870782.01
COMMISNS		
BENEFITS		
OTHER		
EI	57045.30	870782.01
LUMP SUM		
PROVHLTH	57045.30	870782.01
REG.PEN.		
TXB = 11	56293.43	824682.02
TXB = 12		
TXB = 13		
TXB = 14		
TXB = 15		
QUE BEN		

********* TAXABLES BREAKDOWN **********

	CURRENT	THIS YEAR
C.P.P.	57045.30	870782.01
Q.P.P.		
EI EX QC	57045.30	870782.01
EI IN QC		
QPIP		
QC HSF		
ON EHT	6091.32	43467.46
BC EHT	50953.98	827314.55
MB HET		
NLHAPSET		
NT EARNS		
NU EARNS		

**** INPUT TOTALS **** / **** POSTING TOTALS *****

	CURRENT UNITS	ADJUSTMENT UNITS	ADJUSTMENT DOLLARS		UNPOSTED ADJUSTMENT	PREVIOUS DOLLARS	CURRENT DOLLARS	TOTAL DOLLARS
	685.25	144.00	928.05-	REGULAR			55673.03	55673.03
	8.00			SICK HRS			634.62	634.62
VAC			620.40	VAC PAY			620.40	620.40
			1681.41	*EXP REIM			1681.41	1681.41
				AUTO VAC			117.25	117.25
	693.25	144.00	1373.76	TOTAL			58726.71	58726.71
				GROSS EARN			57045.30	57045.30
				NET EARN			58726.71	58726.71
				GOVT PEN			3210.12	3210.12

* NOT IN GROSS. = NOT IN GROSS OR NET.

COMPANY	Totals	Pay Ending Date 16 Aug 2026	Pay Date 21 Aug 2026

	CURRENT		CURRENT & ADJUSTED		YEAR-TO-DATE	
	HOURS/UNITS	AMOUNT	HOURS/UNITS	AMOUNT	HOURS/UNITS	AMOUNT
Earnings		58 726.71		58 726.71		892 847.75
REGULAR	829.25	55 673.03	829.25	55 673.03	11 922.02	796 990.90
STAT HOL						1 312.25
SICK HRS	8.00	634.62	8.00	634.62	305.50	10 273.53
BONUS						34 673.00
VAC PAY		620.40		620.40		26 378.87
VAC TERM						237.19
EXP REIM		1 681.41		1 681.41		22 065.74
AUTO VAC		117.25		117.25		916.27
Deductions		20 921.53		20 921.53		316 335.71
GOVT PEN		3 210.12		3 210.12		49 248.57
EI CONT		838.87		838.87		14 102.70
FEDL TAX		9 659.82		9 659.82		144 329.07
ADVANCE		200.00		200.00		4 200.00
VAC ACCR		2 628.19		2 628.19		35 462.99
*CO CPP		3 210.12		3 210.12		49 248.57
*CO EI		1 174.41		1 174.41		19 743.81
		$\boxed{\$63,111.24}$				

CURRENT

NET PAY
44 817.90

GROSS PAID EARNINGS
57 045.30

TAXES & DEDUCTIONS
13 908.81

Brad Martyniuk

From:	Raj Wijesinghe <Raj@freshslice.com>
Sent:	Monday, August 24, 2026 11:53 AM
To:	Brad Martyniuk
Cc:	Raj Tutt
Subject:	[EXTERNAL] Fw: Urgent – Waheed Receivership Order - Renewed Interim Proposal

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.

This is Exhibit "D" referred to in the affidavit of Zaheer Awan sworn before me at Vancouver, BC this 27 day of August, 2026

A Commissioner for taking Affidavits within British Columbia

Raj Wijesinghe
Litigation Counsel

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M: 604-762-4400
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Global Headquarters
1610 Ingleton Ave, 2nd Floor, Burnaby, BC V5C 5R9

From: Jeremy D. West <jwest@watsongoepel.com>
Sent: August 24, 2026 11:35 AM
To: Dan Parlow <dparlow@kornfeldllp.com>; Raj Wijesinghe <Raj@freshslice.com>; John McEown <jm@mceownassociates.ca>
Cc: Raj Tutt <rt@freshslice.com>; Zaheer Awan <zaheer@freshslice.com>; Beckett Reinecke <breinecke@watsongoepel.com>
Subject: RE: Urgent – Waheed Receivership Order - Renewed Interim Proposal

Raj.

Further to your email this morning, Dan's email below and our telephone discussion. As you know, I called you to discuss point 5 which is also referenced in Dan's email. I also wish to set out my present understanding of things including the previous judgements rendered and the Receivership Order made by Justice Sharma.

Receivership Order

I have already previously written to you regarding the Order and in particular, paragraphs 1 and 2(a) pursuant to which, the Receiver is authorized and directed to take possession and control of the Property, and any and all receipts and disbursements arising out of or from the Property, which includes the bank accounts.

During our discussion you indicated that your clients understanding was that the Receiver was ordered to undertake some form of tracing exercise to identified funds that may have been transferred from the original judgment debtor (JM Food Services Ltd.) to the other defendants. I have been unable to locate that clause in the Order but if it in fact does exist, I would appreciate you identifying it.

Property subject to the Fraudulent Conveyance/Fraudulent Preference decision

As also discussed, I have reviewed the December 1, 2023 Reasons for Judgment of Justice Winteringham. The judgment (which makes declarations under the FCA and FPA) includes the following findings:

1. as of June 21, 2013 JM Food Services was a solvent company with a stream of income from dough sales, continuing sales of franchises, rights to receive interest payments on loans made to franchisees and "valuable rights" associated with the franchise systems (paragraph 127);
2. JM Food Services transferred the right to sell pizza dough, equipment/small-wares, and franchise sales to other defendants without consideration (paragraphs 118 and 119);
3. the "earnings streams" which JM Food Services transferred constituted "property" for the purposes of the FCA and FPA (paragraphs 117 and 121); and
4. the profit from the pizza dough earning stream (as an example), based on figures provided by Mr. Russell at trial, may have increased from $658,000 in 2015 to over $1 million in subsequent years (paragraph 148).

Although it is not strictly necessary to consider this issue at this time given the form of the existing Order, as I read the December 2023 Reasons, any funds derived from the "earnings streams" which were transferred by JM Food Services contrary to the provisions of the FCA and FPA are available for satisfaction of the judgment.

$900,000 interim security.

In light of those comments, perhaps you could clarify whether your clients are in agreement that the $900,000 is, or they are prepared to accept that it can be treated as, funds derived from the "earnings streams" and "property" which was transferred by JM Food Services in breach of the provisions of the FCA and FPA and is available to satisfy the outstanding judgment and the costs of the receivership.

Thank you

Jeremy

WATSON GOEPEL
LAWYERS · AVOCATS
LAW Lawyers Associated Worldwide

Jeremy D. West, Partner

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1200-1075 West Georgia St., Vancouver, BC V6E 3C9
Vancouver | West Vancouver
View my bio

From: Dan Parlow <dparlow@kornfeldllp.com>
Sent: Monday, August 24, 2026 10:41 AM
To: Raj Wijesinghe <Raj@freshslice.com>; Jeremy D. West <jwest@watsongoepel.com>; John McEown <jm@mceownassociates.ca>
Cc: Raj Tutt <rt@freshslice.com>; Zaheer Awan <zaheer@freshslice.com>; Beckett Reinecke <breinecke@watsongoepel.com>
Subject: RE: Urgent – Waheed Receivership Order - Renewed Interim Proposal

Raj,

In this response, I focus only on this comment:

> **5. The $900,000 interim security remains the appropriate mechanism.**
>
> It is precisely for the foregoing reasons that our clients proposed to put up $900,000 as interim security in order to mitigate operational disruption while protecting the position of the Receiver. As previously stated, and without any concession to the contrary, our clients do not accept that this $900,000 constitutes the specific property referenced in the 2023 declarations. That said, funds are inherently fungible, and should any specific property ultimately be traced, this security can be drawn upon to satisfy the order subject to appropriate and mutually agreed-upon terms and conditions.

I do not understand what you are driving at.

Nor do I agree that it is either the Receiver's or the Plaintiffs' duty to embark upon a tracing exercise. We are far beyond that point in the litigation. I will never accept any such proposition.

The answer to all your questions is simple: pay the judgments immediately and post $100,000 additional security as I have proposed, and all the issues go away.

Regards,

Dan Parlow*
Kornfeld LLP
*Law Corporation
d:604.331.8322 | c:778.389.0050 | f:604.683.0570

From: Raj Wijesinghe <Raj@freshslice.com>
Sent: August 24, 2026 9:56 AM
To: Jeremy D. West <jwest@watsongoepel.com>; Dan Parlow <dparlow@kornfeldllp.com>; John McEown <jm@mceownassociates.ca>
Cc: Raj Tutt <rt@freshslice.com>; Zaheer Awan <zaheer@freshslice.com>; Beckett Reinecke <breinecke@watsongoepel.com>
Subject: Re: Urgent – Waheed Receivership Order - Renewed Interim Proposal

EXTERNAL EMAIL

Dear Jeremy,

Thank you for your email of August 21, 2026. For the record, and consistent with your own designation, this response is sent **with prejudice**.

We have now had the opportunity to consult with our clients' accounting team regarding the Receiver's preliminary cash-flow observations and the discussion-stage arrangement you have proposed (i.e., leaving the seized funds with the Receiver and permitting the Defendants to access only incoming funds for "reasonable business expenses").

Following that consultation, our position on your proposal is as follows.

1. The cash-flow figures reviewed by the Receiver are a point-in-time snapshot, not an accrual picture.

The revenue and expense figures reviewed by the Receiver do not correspond entirely to the same period from an accrual accounting perspective. The figures previously provided represent only a snapshot of cash flows at a particular point in time and the ratio of cash inflows to cash outflows is not constant.

At any given time, incoming funds may be required to satisfy obligations linked to previously realized revenues, as well as expenditures required to generate future revenues. A comparison of cash inflows and outflows at a particular point in time therefore does not provide a complete picture of the ongoing financial and operational requirements of the businesses.

Therefore, the premise underlying your proposal namely that that receipts of ~$625,000 will comfortably cover ~$490,000 of outgoings over any given cycle, is not one accounting is able to endorse.

2. The proposed arrangement is not, with respect, a practical solution to the current disruption.

There are multiple operations being carried on across the four entities, each continuously generating transactions that rely directly on the seized accounts. Those include, without limitation:

- payroll for over 200 employees;

- payments to vendors that allow our clients to produce and supply dough to approximately 175 franchise stores; and
- equipment and materials required by new franchise locations currently waiting on our clients to fund their store buildouts.

The funds in the seized accounts are not idle investment reserves or surplus capital; they are working capital, utilized throughout the weeks, months and year in the ordinary course of business. While some expenses are regular and predictable, a substantial volume of expenses are ad hoc and time-sensitive.

3. Case-by-case release, filtered through a "reasonable business expenses" test, is functionally unworkable.

Relying on repeated back-and-forth correspondence whenever funds are required is functionally unworkable and will guarantee that operations continue to remain at a standstill. Subjectively limiting releases to "reasonable business expenses" also creates an unmanageable bottleneck.

From a process standpoint, we would also need to understand whether the same back-and-forth (and attendant uncertainty) is contemplated for the compliance outflows already in the pipeline including GST, PST and corporate income tax (which will undoubtedly be sizeable). Given the transaction volume across the four entities, that framework is not operationally feasible.

4. There must be a workable system with clarity on process.

Any interim regime must provide a workable system with clarity on the process. That is imperative given that (i) we do not know the length of this Receivership process, and (ii) the amount currently seized is, unreasonably, many multiples of the judgment amount.

5. The $900,000 interim security remains the appropriate mechanism.

It is precisely for the foregoing reasons that our clients proposed to put up $900,000 as interim security in order to mitigate operational disruption while protecting the position of the Receiver. As previously stated, and without any concession to the contrary, our clients do not accept that this $900,000 constitutes the specific property referenced in the 2023 declarations. That said, funds are inherently fungible, and should any specific property ultimately be traced, this security can be drawn upon to satisfy the order subject to appropriate and mutually agreed-upon terms and conditions.

6. Application to vary the May 13, 2026 Order.

As you are aware, we have already submitted the request for a hearing before Madam Justice Sharma on August 27/28, 2026 to vary the May 13, 2026 Order. The Defendants intend to proceed with that application and to seek the interim relief substantively described in our earlier correspondence, including the release of operating funds against the proposed $900,000 interim security and appropriate operating protocols going forward.

We remain open to narrowing the issues before the hearing and, in that spirit, invite the Receiver and the Plaintiffs to confirm whether the interim framework outlined above (or a workable variant of it) can be agreed to on consent, in which event a short consent variation order could be presented to the Court in place of a contested hearing.

Failing agreement, we will address the matter fully in our application materials and reserve all of our clients' rights.

We look forward to hearing from you.

Regards,

Raj Wijesinghe
Litigation Counsel

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Fax: (604) 251-6727

Subject: Urgent: Interim Security Proposal, Restoration of Operations and Appearance Before Justice Sharma

Dear Jeremy and Dan,

We acknowledge receipt of Jeremy's email and Dan's letter dated August 21, 2026.

The Defendants do not contend that the judgments against JM Food Services Ltd. should remain unsecured, nor do they seek to prevent the Receiver from carrying out an appropriate tracing exercise. The immediate issue is whether all funds seized from the operating accounts of the Russell Entities and Alexander Entities may properly be retained as property available to satisfy judgments against JM Food Services before the necessary tracing and characterization exercise has been completed, and despite the resulting disruption to active businesses.

Our clients have proposed to post **$900,000 as interim security**. According to the schedule attached to Dan's letter, the quantified judgment debt, interest and assessed costs as of August 20, 2026 total $767,644.87, excluding receivership costs and the costs of the appointment motion. The proposed security therefore exceeds the presently quantified judgment amount.

The 2023 Reasons and the Property Available for Enforcement

Dan's letter quotes extensively from adverse factual findings in the 2023 Reasons, but does not address the paragraphs identifying the property that was transferred or the limits of the relief actually granted.

At paras. 117–121, Justice Winteringham identified the transferred property as the rights and related income streams concerning the sale of pizza dough, equipment and smallwares, and franchises. The Court traced the franchise rights through RFSP and Freshslice Holdings to RF Franchising, the equipment and smallwares rights to 1015214 B.C. Ltd., and the dough-production and operational rights to A&M Enterprise Ltd.

At para. 164(c), the Court ordered that the Plaintiffs could pursue their remedies as judgment creditors against JM Food Services as though JM Food Services remained the legal and beneficial owner of **the transferred property**, and only to the same extent as before the transfer. The Court did not hold that every presently existing asset or bank balance of every defendant automatically constitutes the transferred property or its traceable proceeds. That characterization remains an issue requiring evidence and, where necessary, Court determination.

The limits of the relief are also material. At para. 165, the Court declined to grant an injunction restraining disposition or encumbrance and declined to declare that the defendants held property in trust for the Plaintiffs. At para. 166, the Court rejected the Plaintiffs' request for a joint and several monetary judgment against all defendants because no legal basis for that relief had been pleaded.

Accordingly, our clients are not asserting that the judgment need not be paid. Their position is that enforcement against entities other than the judgment debtor must remain connected to the property identified in the 2023 declarations or its properly traceable proceeds.

Actual Disruption and Losses

Jeremy requested account-specific and cash-flow information. We now provide it. The following operating accounts are blocked:

1. **Freshslice Holdings Ltd. — account ending 6995:** used primarily for surcharge operations, office expenses, new-franchisee onboarding and training, subcontractor payments and monthly revenue-share payments.

2. **RF Franchising Inc. — account ending 7010:** used primarily for franchise promotions and events, travel expenses and biweekly subcontractor payments.

3. **1015214 B.C. Ltd. — account ending 9323:** used for new-store buildouts, ongoing supplies to existing stores, weekly vendor payments, wire transfers and biweekly payroll.

4. **A&M Enterprise Ltd. — account ending 9005:** used for dough production and distribution, marketing expenses, weekly vendor payments, wire transfers and biweekly payroll.

Payments already processed and affected by the restraint include:

- payroll for 1015214 B.C. Ltd.: **$66,357.28**;
- payroll for A&M Enterprise Ltd.: **$61,627.35**; and
- vendor payments: **$49,682.80**.

Further scheduled payments now delayed include:

- subcontractors for 1015214 B.C. Ltd. and A&M Enterprise Ltd.: **$24,401.23**;
- vendor payments for 1015214 B.C. Ltd.: **$79,613.62**; and
- vendor payments for A&M Enterprise Ltd.: **$217,031.36**.

Anticipated receipts affected include:

- A&M Enterprise Ltd.: **$364,382.28**;
- Freshslice Holdings Ltd.: **$148,826.95**; and
- RF Franchising Inc.: **$115,500.00**.

These figures do not include NSF fees, overdraft charges, vendor penalties, interest, or consequential commercial losses. The accounting department has also had to divert resources from filings, compliance work, budgeting and deliverables to other departments. Operations have not merely been inconvenienced; they have been abruptly halted.

The Receiver has repeatedly stated that it does not wish to unduly affect operations. Nevertheless, that is now the practical result. The Plaintiffs' position offers no operational solution: it demands that every dollar remain frozen unless the judgment is paid and an additional $100,000 is posted for unquantified costs. That does not engage with our clients' proposal to secure more than the entire quantified judgment while preserving all tracing and priority issues for the Court.

Renewed Interim Proposal

Pending an urgent appearance before Madam Justice Sharma, our clients renew the following interim and without-prejudice proposal:

1. The Defendants will deposit **$900,000** with the Receiver, or with agreed counsel in trust, as interim security.
2. The security will remain intact and will not be distributed or applied except by written agreement or further order of the Court.
3. Posting the security will not constitute an admission that the $900,000 is property transferred by JM Food Services, property within the 2023 declarations, or proceeds traceable from such property.
4. All claims, priorities, tracing rights, arguments and defences will be preserved as though the substitution of security had not occurred.
5. The Receiver may continue its investigation and tracing exercise concerning the property identified in the 2023 Reasons.
6. The remaining frozen funds will be returned and the identified operating accounts restored so that payroll, franchisee operations, centralized banking and ordinary-course obligations may resume.
7. The Defendants will provide reasonable, ongoing account and cash-flow information necessary to support the interim arrangement.
8. The parties will attend urgently before Madam Justice Sharma for directions concerning the interpretation of the May 13, 2026 Order, the treatment of operating funds, the characterization of the security, any appropriate reserve for receivership costs, and the process for identifying property subject to the 2023 declarations.

This proposal fully secures the presently quantified judgment, permits the Receiver to continue tracing, and avoids further damage to the businesses pending the Court's determination. It requires no party to concede the disputed characterization or priority issues.

Jeremy, we respectfully ask that the Receiver, as an officer of the Court, take the lead in working with counsel toward a practical interim solution. The Receiver has said that it does not wish to disrupt operations and is prepared to work collaboratively. The financial information above now confirms that operations have been halted and identifies the immediate payroll, vendor, subcontractor and franchise-related consequences. The Plaintiffs have offered no workable proposal to address that harm. We therefore encourage the Receiver to propose any additional monitoring, reporting, reserve or trust terms it reasonably considers necessary so that the affected operating accounts can be restored pending the hearing before Madam Justice Sharma.

If agreement cannot be reached, we will seek urgent directions from Madam Justice Sharma and place before the Court evidence of the operational losses, the security offered, the absence of a workable alternative from the Plaintiffs, and our clients' efforts to mitigate loss while preserving the judgment.

Our clients expressly reserve all rights to seek appropriate relief, including compensation, costs or other remedies against any party whose conduct is ultimately determined to have exceeded the Order, unreasonably prevented a protective interim arrangement, or caused avoidable loss after adequate security was offered. Nothing in this correspondence alleges that such liability has already been established.

Please confirm by **5pm today** whether the interim proposal is accepted. If it is not accepted, then we will seek August 27 and/or August 28, 2026 for an urgent appearance before Madam Justice Sharma.

We remain ready to work constructively and immediately toward terms that protect the Plaintiffs' judgment and the Receiver's tracing mandate while allowing employees, franchisees, suppliers and the affected businesses to continue operating.

Yours sincerely,

Per:

Rajeewa Wijesinghe
General Counsel