

**ONTARIO
SUPERIOR COURT OF JUSTICE
IN BANKRUPTCY AND INSOLVENCY**

B E T W E E N:

CAISSE POPULAIRE POINTE-AUX-ROCHES-TECUMSEH INC.

Plaintiff

- and -

G.I. FARMS INC., VANTEC USA ONTARIO INC., 2287188 ONTARIO INC., 2027512
ONTARIO INC. and 1690169 ONTARIO INC.

Defendants

PLAINTIFF'S RESPONDING MOTION RECORD

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**ONTARIO
SUPERIOR COURT OF JUSTICE
IN BANKRUPTCY AND INSOLVENCY**

B E T W E E N:

CAISSE POPULAIRE POINTE-AUX-ROCHES-TECUMSEH INC.

Plaintiff

- and -

**G.I. FARMS INC., VANTEC USA ONTARIO INC., 2287188 ONTARIO INC., 2027512 ONTARIO
INC. and 1690169 ONTARIO INC.**

Defendants

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DOCUMENT

TAB

Affidavit of Peter Sciortino sworn March 20, 2018

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TAB 1

**ONTARIO
SUPERIOR COURT OF JUSTICE
IN BANKRUPTCY AND INSOLVENCY**

BETWEEN:

CAISSE POPULAIRE POINTE-AUX-ROCHES-TECUMSEH INC.

Plaintiff

- and -

**G.I. FARMS INC., VANTEC USA ONTARIO INC., 2287188 ONTARIO INC., 2027512
ONTARIO INC. and 1690169 ONTARIO INC.**

Defendants

AFFIDAVIT OF PETER SCIORTINO

I, Peter Sciortino, of the City of Montreal, MAKE OATH AND SAY:

1. I am the account manager special loans acting for Caisse Populaire Pointe-Aux-Roches-Tecumseh Inc. (the "**Plaintiff**" or "**Desjardins**") and, as such, have knowledge of the matters to which I hereinafter depose. Unless I indicate to the contrary, these matters are within my own knowledge and are true. Where I have indicated that I have obtained facts from other sources, I believe those facts to be true.

**FIRST REPORT OF BDO CANADA LIMITED (the "Receiver")
DATED MARCH 15, 2018 (the "Receiver's Report")**

2. The Plaintiff is responding to the motion returnable March 22, 2018 in these proceedings. I have had carriage of this matter for the Plaintiff since its commencement

and also have had weekly conference calls with representatives of the Receiver since the signing of the Order of Justice Templeton dated December 22, 2017 (the "Receivership Order").

3. I agree with the content of the Receiver's Report and I also agree with the Proposed Sale Process in paragraphs 90-102 of the Receiver's Report.

4. The Plaintiff has requested that the Receiver obtain an Order that the Porrone be given notice that they must vacate the property known municipally as 2980 Talbot Road South, Kingsville, Ontario (the "Property") by April 15, 2018. I believe that the sale proceeds will be maximized if the Property is vacant.

5. As set out in paragraph 3 of the draft Order, the new borrowing limit is being increased from \$250,000 to \$1,000,000. The Plaintiff will be funding this amount. It would be in everyone's best interests to minimize the ongoing costs of the receivership through a sale of the Property conducted on a vacant property.

6. I make this Affidavit in support of an Order as set out Tab 3 of the Receiver's Motion Record and for no improper purpose.

SWORN BEFORE ME at the)
City of MUNDRUM, in the)
Province of Quebec this 25th)
day of March, 2018)



Commissionaire for Taking Affidavits



PETER SCIORTINO

CAISSE POPULAIRE POINTE-AUX ROCHES-TECUMSEH INC.

v.

G.I. FARMS INC. ET AL

Plaintiff

Defendants

Court File No. 35-1842432T

**ONTARIO
SUPERIOR COURT OF JUSTICE
IN BANKRUPTCY AND INSOLVENCY**

PROCEEDING COMMENCED AT LONDON

PLAINTIFF'S RESPONDING MOTION RECORD

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