

COURT FILE NO. 1603 02314

COURT COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE EDMONTON

PLAINTIFFS THREE M MORTGAGES INC. and AVATEX LAND CORPORATION

DEFENDANT'S TODD OEMING, TODD OEMING AS THE PERSONAL REPRESENTATIVE OF THE ESTATE OF ALBERTA OEMING AND THE ESTATE OF ALBERTA OEMING

DOCUMENT AFFIDAVIT

ADDRESS FOR  
SERVICE AND  
CONTACT  
INFORMATION OF  
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**AFFIDAVIT OF PETER WALL**


**Sworn on March 6, 2020**

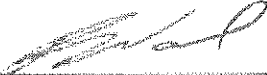
I, Peter Wall, of Edmonton, Alberta, SWEAR AND SAY THAT:

1. I am a director of 1705221 Alberta Ltd., an offeror in these proceedings, and as such I have personal knowledge of the matters set out in this Affidavit except where stated to be based on information and belief, in which case I do verily believe the same to be true.
2. I refer to the affidavit sworn in these proceedings by my son Grant Wall on February 27, 2020 and affirm the contents.
3. The lands which are the subject matter of this sales process are right next door to land which our family already own. I own 2 quarter sections and my son owns 1 quarter section adjacent to the entire parcel and have an offer in on a fourth quarter just north of the parcel.

4. My intention in acquiring the parcel is to use it solely for recreational purposes for my family and to keep it from being commercially developed. It is unique in that sense: I want to maintain the land in a manner which will enable me and my family to enjoy it for generations without having to be concerned with commercial development butting up against our existing land.
  
5. I am quite concerned with the fairness of this process. The Receiver's agent, Reed Newnham, is known to me. When I purchased the surrounding land, he was the listing agent. He assured me, personally and through my agent, that the offer presented by my company was a good offer and was going to be accepted. The acceptance never came. Rather, I learned now that while we were waiting for acceptance to come through, another offeror made an offer, presumably after being informed of the existence of my offer, which competing offer was accepted by the Receiver. I was not told another offer was forthcoming. I was not given an opportunity to consider changing my offer.

SWORN BEFORE ME at Edmonton, Alberta, )  
 this 9th day of March, 2020 )

  
 \_\_\_\_\_ )  
 (Commissioner for Oaths in and for the )  
 Province of Alberta) )

  
 \_\_\_\_\_ )  
 Peter Wall )

TRACY HOOK  
 A COMMISSIONER FOR OATHS IN AND  
 FOR THE PROVINCE OF ALBERTA  
 COMMISSION EXPIRES ON JULY 17, 2020