

**2025 01G 0491**  
**IN THE SUPREME COURT OF NEWFOUNDLAND AND**  
**LABRADOR IN BANKRUPTCY AND INSOLVENCY**

**IN THE MATTER OF** the *Companies*  
*Creditors Arrangement Act* R.S.C., 1985  
c. C- 36 as Amended (the "CCAA")


**AND IN THE MATTER OF** an application  
of Karwood Contracting Ltd., Karwood  
Engineering Ltd., Karwood Design  
Group Ltd., and Karwood Ontario Ltd.  
(the "**Applicants**")


**AFFIDAVIT**

I, Darren O'Keefe, Solicitor, in the Province of Newfoundland and Labrador, MAKE OATH AND SAY:

1. I am the solicitor for the Applicants.
2. I file the within affidavit for the purpose of having the within application scheduled. To the best of my knowledge, information and belief, based on direct discussion with my client and/or the Monitor, the facts contained herein are true.
3. I make this affidavit for the purpose of supporting the relief requested therein and for no improper purpose.

**DATED** at St. John's, in the Province of Newfoundland and Labrador, this 23 day of April 2025.

  
Commissioner for Oaths

  
Darren D. O'Keefe

**MELISSA De CARIA**  
A Commissioner for Oaths in and for  
the Province of Newfoundland  
and Labrador.  
Commission expires December 31, 2028