

Clerk's Stamp:

COURT FILE NUMBER

2503 08529

COURT

COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE

EDMONTON

PLAINTIFF

SERVUS CREDIT UNION LTD.

DEFENDANTS

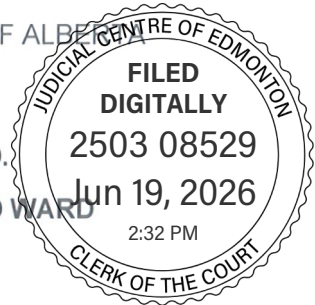
**2353824 ALBERTA LTD. AND WARD
FARNUM FLEMING**

DOCUMENT

AFFIDAVIT

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF PARTY
FILING THIS DOCUMENT

Dentons Canada LLP
Stantec Tower
2500, 10220 103 Avenue NW
Edmonton AB T5J 0K4
Attention: Tom Gusa
Ph. 780.423.7219 Fx. (780) 423-7276
File No.: 405692-628



Sworn on June 15, 2026

I, Heather Stewart, of the City of Edmonton in the Province of Alberta, MAKE OATH AND SAY THAT:

1. I operate and manage Hilltop Property Management (a Division of 1356121 Alberta Ltd.) ("**Hilltop**"), the property management company appointed by the Plaintiff in this Action pursuant to a Preservation Order granted on March 10, 2026 (the "**Preservation Order**"), in relation to the Mortgaged Property in this Action municipally described as 145 MacDonald Crescent, Fort McMurray (the "**Property**").
2. Hilltop has 20 years of experience operating as a property manager in the context of mortgage enforcement proceedings.
3. Hilltop has acted as a property manager for commercial buildings located within Fort McMurray on 15 occasions.
4. On March 11, 2026, Hilltop attended the Property and the locks were changed with only Hilltop's inspector, Brian Regular, and the Plaintiff's realtor, Susan Lore, having access to the keys to the Property.
5. Since securing the Property, I, on behalf of Hilltop, have received numerous requests from parties, who are either tenants at the Property and whose belongings are located at the Property or from other parties who otherwise store their belongings at the Property, to access the Property to remove their belongings.

6. The parties that have contacted Hilltop to remove their belongings include:
- (a) who I understand to be the primary tenant at the Property, who I refer to as "BMAC" ("BMAC"), the principal of which is an individual I refer to as "Bernie" ("Bernie"). I understand that Bernie is Bernie Burden, a registered director of Platinum Landscaping and Construction Ltd. ("Platinum"), and that Platinum either is or was also a previous tenant at the Property. Attached hereto and marked as **Exhibit "A"** is a true copy of a corporate registry search for Platinum;
 - (b) Troy Hibbs, who is also a registered director of Platinum, and who is possibly connected to BMAC;
 - (c) Sara Routhier;
 - (d) Travis Boyko;
 - (e) Austin Ashfield; and
 - (f) an individuals from a company referred to as "Coinamatic".
7. With the consent of the Defendants in this Action, the only removal of assets facilitated by Hilltop have been for Sara Routhier and Austin Ashfield. Attached hereto and marked as **Exhibit "B"** are copies of the written consent of the Defendant allowing Hilltop to provide access to the Property for purposes of allowing parties to remove assets.
8. I have also been contacted by Intact Insurance, and one of its agents from ServiceMaster, who requested access to the Property for the purposes of assessing an insurance claim connected with the Property.
9. I make this Affidavit in support of an Order for the appointment of a receiver in these proceedings, and for no improper purpose.

SWORN BEFORE ME at the City of)
Edmonton, in the Province of Alberta, this 15th)
day of June, 2026)



Commissioner for Oaths in and for
the Province of Alberta



Heather Stewart

Kerry James
A Commissioner for Oaths
In the Province of Alberta
Appointment Expires September 5, 2028

This is **Exhibit "A"** referred to in the
Affidavit of Heather Stewart
Sworn before me this 15th day of June, 2026



A Commissioner for Oaths in and for Alberta

Kerry James
A Commissioner for Oaths
In the Province of Alberta
Appointment Expires September 5, 2028

Government Corporation/Non-Profit Search of Alberta ■ Corporate Registration System

Date of Search: 2026/06/15
Time of Search: 09:55 AM
Search provided by: DENTONS CANADA LLP
Service Request Number: 47435497
Customer Reference Number: 405692-628 TLG/sg

Corporate Access Number: 2021176348
Business Number: 754480119
Legal Entity Name: PLATINIUM LANDSCAPING AND CONSTRUCTION LTD.

Legal Entity Status: Active
Alberta Corporation Type: Named Alberta Corporation
Registration Date: 2018/05/08 YYYY/MM/DD
Date of Last Status Change: 2022/11/09 YYYY/MM/DD

Revival/Restoration Date: 2022/11/09 YYYY/MM/DD

Registered Office:

Street: 100 CHESTNUT WAY
City: FORT MCMURRAY
Province: ALBERTA
Postal Code: T9K0M6

Records Address:

Street: 100 CHESTNUT WAY
City: FORT MCMURRAY
Province: ALBERTA
Postal Code: T9K0M6

Email Address: PLATINIUMLANDSCAPING@HOTMAIL.COM

Primary Agent for Service:

Last Name	First Name	Middle Name	Firm Name	Street	City	Province	Postal Code	Email
ROWE	RYAN			100 CHESTNUT WAY	FORT MCMURRAY	ALBERTA	T9K0M6	PLATINIUMLANDSCAPING@HOTMAIL.COM

Directors:

Last Name: BURDEN
First Name: BERNIE
Street/Box Number: 424 KILLDEER WAY
City: FORT MCMURRAY
Province: ALBERTA
Postal Code: T9K0R4

Last Name: HIBBS
First Name: TROY

Street/Box Number: 100 CHESTNUT WAY
City: FORT MCMURRAY
Province: ALBERTA
Postal Code: T9K0M6

Last Name: ROWE
First Name: RYAN
Street/Box Number: 100 CHESTNUT WAY
City: FORT MCMURRAY
Province: ALBERTA
Postal Code: T9K0M6

Voting Shareholders:

Last Name: BURDEN
First Name: BERNIE
Street: 424 KILLDEER WAY
City: FORT MCMURRAY
Province: ALBERTA
Postal Code: T9K0R4
Percent Of Voting Shares: 33

Last Name: HIBBS
First Name: TROY
Street: 100 CHESTNUT WAY
City: FORT MCMURRAY
Province: ALBERTA
Postal Code: T9K0M6
Percent Of Voting Shares: 33

Last Name: ROWE
First Name: RYAN
Street: 100 CHESTNUT WAY
City: FORT MCMURRAY
Province: ALBERTA
Postal Code: T9K0M6
Percent Of Voting Shares: 34

Details From Current Articles:

The information in this legal entity table supersedes equivalent electronic attachments

Share Structure: 100 CLASS 'A' COMMON VOTING SHARES
Share Transfers Restrictions: NONE
Min Number Of Directors: 1
Max Number Of Directors: 3
Business Restricted To: NONE
Business Restricted From: NONE
Other Provisions: NONE

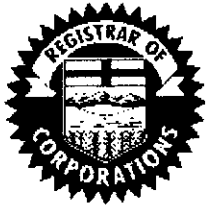
Other Information:**Last Annual Return Filed:**

File Year	Date Filed (YYYY/MM/DD)
2025	2025/04/04

Filing History:

List Date (YYYY/MM/DD)	Type of Filing
2018/05/08	Incorporate Alberta Corporation
2019/06/25	Change Director / Shareholder
2020/02/23	Update BN
2022/07/02	Status Changed to Start for Failure to File Annual Returns
2022/11/02	Status Changed to Struck for Failure to File Annual Returns
2022/11/09	Initiate Revival of Alberta Corporation
2022/11/09	Complete Revival of Alberta Corporation
2025/04/04	Enter Annual Returns for Alberta and Extra-Provincial Corp.

The Registrar of Corporations certifies that, as of the date of this search, the above information is an accurate reproduction of data contained in the official public records of Corporate Registry.



This is **Exhibit "B"** referred to in the
Affidavit of Heather Stewart
Sworn before me this 15th day of June, 2026



A Commissioner for Oaths in and for Alberta

Kerry James
A Commissioner for Oaths
In the Province of Alberta
Appointment Expires September 5, 2028

Gmeiner, Sandra

From: Hilltop <hilltop@bailiff.ab.ca>
Sent: Monday, June 15, 2026 3:27 PM
To: Gusa, Tom
Subject: FW: Locked up items / 145 Macdonald Crescent. - Austin Ashfield

[WARNING: EXTERNAL SENDER]

Heather Stewart

Hilltop Management
Office 780-465-8900
Cell 780-919-3095

From: Gusa, Tom <tom.gusa@dentons.com>
Sent: April 29, 2026 3:04 PM
To: Hilltop <hilltop@bailiff.ab.ca>; Ward Fleming <ward@flemingdev.com>
Cc: Ron Schuldhaus <ron@dslp.ca>; Bill Moore <bill.moore@servus.ca>
Subject: FW: Locked up items / 145 Macdonald Crescent.

Heather – see the below permission for Austin to access the property, please facilitate that.

Ward – we were also just contacted by Travis Boyko, 780-742-3667. Travis apparently had an agreement with one of the tenants at this property, to store his equipment there. Travis is requesting access to remove his truck and concrete pump from the property. He has a job with Enbridge, which he needs to start on May 1, 2026, and realized when he attended the property yesterday that the locks had been changed. Can we let him in to remove these items?

Tom Gusa
Partner

☎ +1 780 423 7219

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From: Ward Fleming <ward@flemingdev.com>
Sent: Wednesday, April 29, 2026 2:32 PM
To: Ron Schuldhaus <ron@dslp.ca>; Gusa, Tom <tom.gusa@dentons.com>
Subject: RE: Locked up items / 145 Macdonald Crescent.

[WARNING: EXTERNAL SENDER]

Hello everyone,

Austin is allowed to remove his equipment.

GMC 7500 topkick, a custom mobile hydraulic pump unit, table saw and than out in the yard I have a pipe rack and misc material right outside the bay.

Please let the property manager know and contact Austin.

His information is below. Please contact Heather to let him get his property.

Thanks for the help,
Ward

Ward Fleming
Direct: 780 893 1159
All West Group of Companies | All About Abatement Ltd.

All West Bio-Industrial Park
6415 – 75 Street
Edmonton, AB T6E 0T3

From: Austin Ashfield <wd_services@outlook.com>
Sent: April 29, 2026 2:02 PM
To: Ward Fleming <ward@flemingdev.com>
Subject: Locked up items

You don't often get email from wd_services@outlook.com. [Learn why this is important](#)

Good afternoon Ward,

Thanks for taking the time to read my email first of all and letting Fred pass along your contact.

I was renting out a bay "from" Platinum last year up until january this year when I moved out, had no idea it was your building as far as I was told they were renting to own and I was renting off of them. No contract or anything just a hand shake agreement for 5k a month.

When I moved out they told me I could come back for my service truck and the last couple things and than next thing I knew I was locked out with them. For the past couple months troy has given me the run around and made it seem like theyre being wronged to and blah blah blah but the more I have found out I have realized that there story isnt quite true.

I reached out to the heather lady whos name and number is on the door trying to work on getting my stuff back and today was doing a job for fred over at his shop when he said you could maybe help

Anyways im hoping to retrieve my GMC 7500 topkick, a custom mobile hydraulic pump unit, table saw and than out in the yard I have a pipe rack and misc material right outside the bay.

Sorry you have to deal with them guys but I can assure you im not and have never been affiliated with them, I paid my rent to them on time if not most of the time early because they asked almost monthly for it in advance and I just ended up on the wrong side I guess as a young bisuness man learning a lesson the hard way I guess.

Anyways whatever you can allow to help would be greatly appreciated buddy and if theres anything you need from me or I can do just let me know

Thanks



Austin Ashfield

Owner/Manager

WHITE DIAMOND FABRICATION

PH: 780-531-0323

wd_fab@hotmail.com

Gmeiner, Sandra

From: Ward Fleming <ward@flemingdev.com>
Sent: Tuesday, April 7, 2026 4:52 PM
To: Gusa, Tom; Ron Schuldhaus
Cc: Hilltop
Subject: RE: access request -- april 8th, 2026

[WARNING: EXTERNAL SENDER]

That's fine.

From: Gusa, Tom <tom.gusa@dentons.com>
Sent: April 7, 2026 4:42 PM
To: Ward Fleming <ward@flemingdev.com>; Ron Schuldhaus <ron@dslp.ca>
Cc: Hilltop <hilltop@bailiff.ab.ca>
Subject: RE: access request -- april 8th, 2026

Ward – please also confirm that you are ok with allowing Sara Routhier to attend the property tomorrow at 1030am, or on any other date on which the inspector is available, to retrieve and remove the 2018 F150, registration attached.

Tom Gusa
Partner

 +1 780 423 7219
Dentons Canada LLP | Edmonton

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From: Gusa, Tom
Sent: Tuesday, April 7, 2026 4:40 PM
To: Ward Fleming <ward@flemingdev.com>; Ron Schuldhaus <ron@dslp.ca>
Cc: Hilltop <hilltop@bailiff.ab.ca>
Subject: RE: access request -- april 8th, 2026

The inspector (actually his wife, Tanya) will be on site between 1030am-1130am tomorrow only, to deal with other matters. She only has one hour available.

If Ward attends at that time then he is free to access the property. The building will be locked up when Tanya needs to leave the property.

Tom Gusa
Partner

 +1 780 423 7219
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From: Ward Fleming <ward@flemingdev.com>

Sent: Tuesday, April 7, 2026 4:05 PM

To: Ron Schuldhaus <ron@dslip.ca>; Gusa, Tom <tom.gusa@dentons.com>

Subject: access request -- april 8th, 2026

[WARNING: EXTERNAL SENDER]

Hi Ron,

Please request access to the property.

Reason – Assessing the water damage to the flooded building.

Date: April 8th, 2026 @ 11 am approx..

Ward