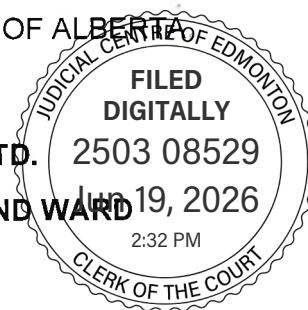


Clerk's Stamp:

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	<u>AFFIDAVIT OF REALTOR</u>
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 19, 2026

I, Susan Lore, Realtor, of the City of Fort McMurray in the Province of Alberta, MAKE OATH AND SAY THAT:

1. I am the realtor that is conducting the judicial listing for the Mortgaged Lands in this Action, as is defined in the Consent Redemption Order – Listing, granted December 4, 2025, and filed January 16, 2026 (the “**Property**”).
2. The Property has been listed for sale by me as follows:
 - (a) from January 23, 2026 to March 23, 2026, at the list price of \$4,200,000.00; and
 - (b) from March 24, 2026 to present, at a list price of \$4,000,000.00.
3. We have received no offers to purchase the Property as at the date of swearing this my Affidavit.
4. Attached hereto and marked as **Exhibit “A”** to this my Affidavit is a true copy of a comprehensive marketing update regarding the Property, dated May 25, 2026 (the “**Update**”).
5. Attached hereto and marked as **Exhibit “B”** to this my Affidavit is a true copy of images of the ongoing marketing efforts and materials made by me with respect to the advertisement of the Property, which were included as appendices in my Update.

6. Attached hereto and marked as **Exhibit "C"** are true aerial pictures taken of the exterior yard of the Property on May 26, 2026.
7. On June 12, 2026, I attended at the Property, and attached hereto and marked as **Exhibit "D"** are true pictures of the contents of the front building located upon the property, and the outdoor yard generally.
8. On June 15, 2026, I was contacted by the Defendant, Ward Fleming, who advised that a tenant to the Property had opened the locked and secured gate to the Property, and was operating within the yard to the Property to remove gravel yard pad situated within the yard.
9. I attended the Property on June 15, 2026, to find that the locked and secured gate to the yard to the Property had been opened, and within the yard to the Property it was apparent that very recently, perhaps even on the same day, unknown individuals accessed the Property to remove gravel inventory from a pile situated within the yard. It also appeared to me that these individuals were also removing gravel making up the pad in the yard. Attached hereto and marked as **Exhibit "E"** are true copies of the pictures of the state of the yard during this particular visit, which pictures include what appear to be very recent tracks of an excavator and a dump truck which removed the gravel.
10. I am advised by the property manager for the Property, Heather Stewart of Hilltop Property Management, and do verily believe that she confirmed on June 15, 2026 that the party that accessed the yard was the previous tenant, referred to as 'BMAC', and that the property manager did not approve their access in advance.
11. On June 17, 2026, I attended at the Property, and attached hereto and marked as **Exhibit "F"** are true pictures of the contents of the back building located upon the property.
12. During this particular visit to the Property, I noticed that the excavator being used by these unknown individuals to remove the gravel had now also been removed from the yard, that the gate to the yard was now closed, but not locked.
13. I make this Affidavit in support of an Order extending the judicial listing, 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 19th)
day of June, 2026)



Commissioner for Oaths in and for
the Province of Alberta



Susan Lore

Amaan Suleman
Student-at-Law

This is **Exhibit "A"** referred to in the
Affidavit of Susan Lore
Sworn before me ~~on~~ ^{at} the 19th day of June, 2026

✓ this ✓ SA


A Commissioner for Oaths in and for Alberta

Amaan Suleman
Student-at-Law

Gmeiner, Sandra

From: Susan Lore <susan@theloregroup.com>
Sent: Sunday, May 24, 2026 12:27 PM
To: Gusa, Tom
Cc: Bill Moore
Subject: Marketing Update – 145 MacDonald Crescent, Fort McMurray
Attachments: May 2026 Combined Email Newsletter.png; Spacelist - 145 Macdonald - May 2026.png; May 2026 Combined Commercial Ad.png; Costar - 145 Macdonald - May 2026.png; Realtorca - 145 Macdonald - May 2026.png; 145 MacDonald Crescent - Brochure.pdf

[WARNING: EXTERNAL SENDER]

Good Afternoon,

Please find attached the latest marketing update for 145 MacDonald Crescent, Fort McMurray, AB, together with current analytics, platform performance, and updated promotional materials for your review.

Our marketing efforts remain active and strategically focused on maximizing exposure to qualified purchasers across multiple channels. We continue to refine positioning, maintain consistent outreach, and engage directly with users, investors, developers, and brokers active within the industrial and service commercial sectors.

Current Marketing Exposure

The property continues to receive ongoing exposure through the following platforms and initiatives:

MLS / Realtor.ca (Pillar 9)

<https://www.realtor.ca/real-estate/29286014/145-macdonald-crescent-fort-mcmurray-mackenzie-park>

The Lore Group Commercial Platform

<https://fortmcmurraycommercialproperties.com/145-macdonald-crescent/>

Coldwell Banker United Commercial Network

<https://www.coldwellbankerunited.ca/real-estate-listings/145-macdonald-crescent-fort-mcmurray/>

SpaceList Commercial Platform

https://www.spacelist.ca/listings/965142/ab/fort_mcmurray/for-sale/industrial/145_macdonald_crescent

In addition to online advertising, the property continues to be circulated through direct broker communications, investor outreach, and targeted campaigns aimed at purchasers seeking industrial sites, yard-oriented operations, redevelopment opportunities, or functional owner-user properties.

Digital Marketing & Outreach

Targeted digital advertising campaigns continue to generate steady impressions, click-through activity, and inquiries. Advertising materials and imagery have been refreshed periodically to maintain strong visibility and market relevance.

Broker-to-broker outreach and direct purchaser follow-up also remain ongoing, with continued emphasis on qualified industrial users and businesses requiring functional yard space and service commercial capabilities.

Signage-Now that the snow piles have melted a sign has been installed- there is a broken sign littering the front of the property from another firm that may require removal

Sales Activity & Market Response

We continue to receive consistent engagement on the listing through online platforms, brochure activity, inquiries, and direct discussions.

Recent activity includes:

- A mechanical-related user completed a property tour
- A trucking company has toured the property and reviewed operational suitability
- Two recent tours were completed through outside brokerages

Feedback received to date has generally been positive regarding:

- Site size and functionality
- Industrial location
- Building usability
- Long-term redevelopment and operational potential

The primary concerns raised by prospective purchasers continue to relate to:

- Existing condition of portions of the site
- Previous Tenants property removal
- Previous water damage and remediation uncertainty
- Pricing sensitivity in relation to current condition considerations

Updated Marketing Materials

The property brochure has recently been revised and refined to provide a more polished, buyer-focused presentation of the asset. Updated materials continue to circulate through all active marketing channels and direct prospect communications. Updated summer photos will be taken this week along with aerials and all marketing mediums will be refreshed.

Market Positioning

Our current strategy continues to position 145 MacDonald Crescent as an opportunity offering strong functional value, site utility, and future potential within the Fort McMurray industrial market. We remain focused on maintaining broad exposure while targeting users most likely to see long-term operational or redevelopment value in the property.

Summary

Overall, the property continues to maintain solid visibility and ongoing market engagement across all active platforms. The listing is currently at approximately 121 days on market without a finalized offer. It is our

opinion that the previous water event and resulting damage concerns have impacted purchaser confidence and slowed overall deal progression.

At this stage, it may be beneficial to discuss whether there is any update regarding potential insurance remediation efforts. If remediation is not anticipated, we may also want to evaluate whether a pricing adjustment or revised positioning strategy could help improve market responsiveness moving forward.

We remain fully committed to actively marketing the property, maintaining consistent follow-up with prospects, and pursuing every opportunity to secure the right purchaser.

Thank you again for your continued trust and partnership. We truly appreciate the opportunity to represent this asset.

Have a great day

Susan Lore



Susan Lore

REALTOR®

[The Lore Group – Coldwell Banker United](#)

Mobile: [\(780\) 714-1060](tel:7807141060) | Email: susan@theloregroup.com

Address: [9905 Sutherland Street, Fort McMurray, AB T9H 1V3](#)

Facebook: facebook.com/theloregroup | Instagram: [@theloregroup](https://instagram.com/theloregroup)

Residential: theloregroup.com | Commercial: fortmcmurraycommercialproperties.ca

#1 Team Fort McMurray (CB) 2024 Coldwell Banker Canada - Team:

Top 2 in Canada (Units) | Top 3 in Canada (GCI) | Canadian President's Circle

This email may contain confidential or privileged information. If you are not the intended recipient, please notify the sender, delete the email, and do not read, distribute, or use its contents. No privileges are waived by mistaken delivery.

This is **Exhibit "B"** referred to in the
Affidavit of Susan Lore
Sworn before me ~~on~~ ^{At} the 19th day of June, 2026

✓ this ✓ Co


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Amaan Suleman
Student-at-Law



May 2026 - Fort McMurray Commercial Properties



[Export report](#)

#92 • Sent on May 01, 2026 3:21 PM

Subject

From

Reply to

Exclusive Fort McMurray, AB Susan Lore <susan@theloregr
Commercial Listings for Busi...oup.com> susan@theloregroup.com

[Overview](#) [Deliverability](#) [Opens](#) [Clicks](#) [Conversions](#) [Unsubscribes](#)

Campaign performance Automated opens and clicks included.

Delivered Opens Clicks Conversions

927 [View](#) 383 [View](#) 295 [View](#) 0

Delivery rate Open rate Click-through rate Conversion rate

95.57% 41.32% 31.82% 0%

Filter



Listing Address

145 Macdonald Crescent, Fort McMurray

Listing Agent

Type Agent Name or Email

Current Status

Active



 Apply Filter

My Listings

Address	Suite	Primary	Secondary	Views
145 Macdonald Crescent Industrial for Sale	N/A	SUSAN LORE susan@theloregroup.com		71

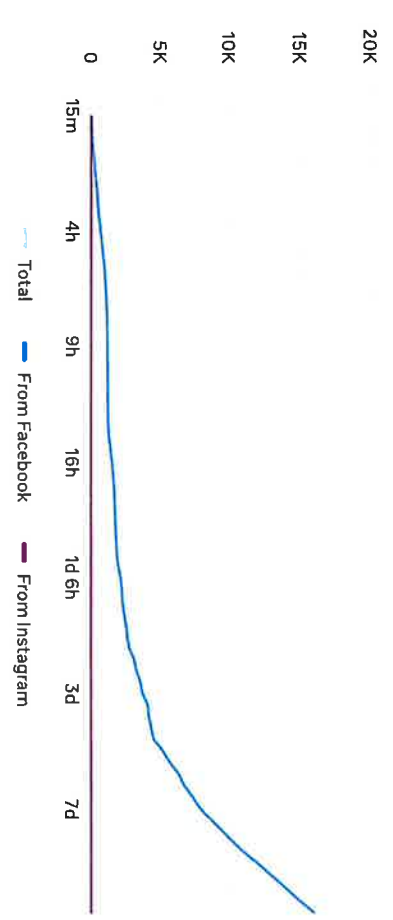
Total performance Facebook Instagram

Overview

Views 16.9K Interactions 39 Link clicks 15 Follows 0

Views 16,852 from Facebook 64 from Instagram

Total Followers



Organic 1,451 Ads 15,465

Interactions 39 37 from Facebook 2 from Instagram

Likes and reactions 5 Comments 0 Shares 32 Saves 2

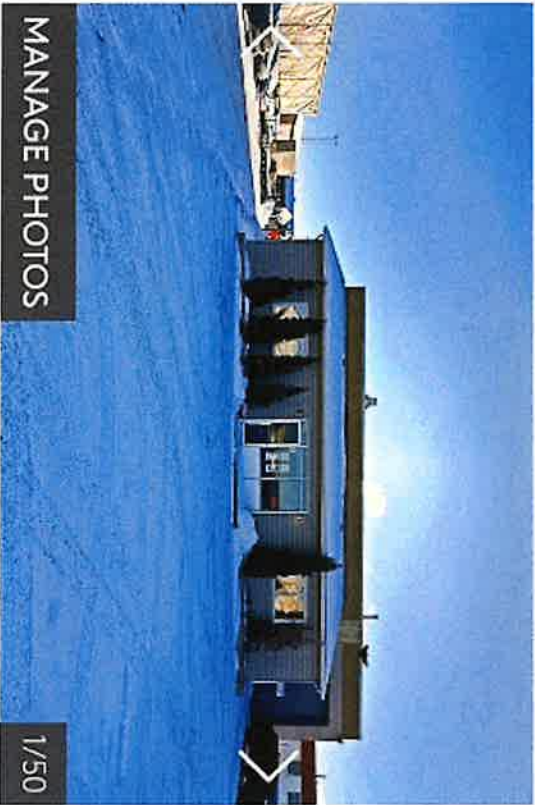
1 from ads 0 from ads 0 from ads 2 from ads

Link clicks 15

Organic Ads

Portfolio of 2 Assets For Sale 145 Macdonald Crescent

For Sale | \$3,999,999.00 | Active |  Secure info: Registration



Days Since Last Update

90 Day Views

Updated Today

203

Edit Listing

Confirm up-to-date

Want to improve?

HIDE SALE INFO ^ REMOVE LISTING

Sale Price

Cap Rate

NOI

\$3,999,999.00

--

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145 Macdonald Crescent Fort McMurray, Alberta \$3,999,999

Listing last updated: 2026-04-19
MLS® Number A2281191

119 days on REALTOR.ca

COLDWELL BANKER UNITED

Listing Insights

7 days

30 days

90 days

All history

Summary

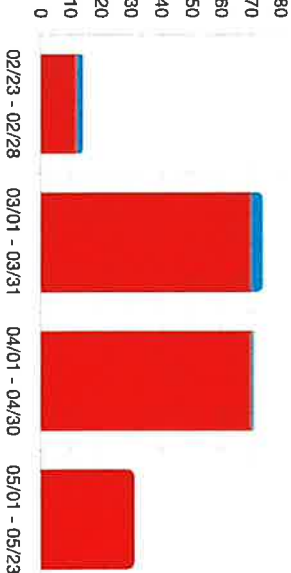
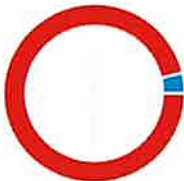
All Websites & Apps

REALTOR.ca
Websites & Apps

REALTOR.ca DDF®
Websites

190 Views (Last 90 days)

183 views on REALTOR.ca
7 views on REALTOR.ca DDF®



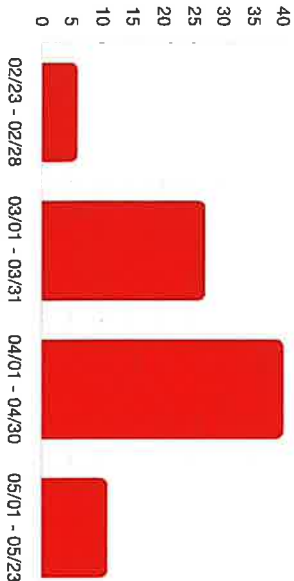
84 Actions (Last 90 days)

All actions captured come from Realtor.ca

83 Property View Actions

0 Sharing Actions Taken

1 REALTOR® Website Visits



JUDICIAL SALE | 145 MACDONALD CRESCENT

High-Exposure Industrial Property on 1.59 Acres with Two Warehouses in Mackenzie Industrial Park

Opportunity to acquire a highly functional industrial shop property situated on a 1.59-acre site in the well-established MacKenzie Industrial Park. The property is improved with two industrial buildings totalling approximately 14,400 SF, offering exceptional flexibility for owner-users in industrial, service, logistics, fleet, or contractor-based operations. A defining feature of this offering is the expansive secure yard and ample paved parking, providing excellent outdoor storage, fleet accommodation, and maneuverability for trucks and equipment. The site layout allows for efficient circulation and supports high-activity industrial use.



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COMMERCIALPROPERTIES.COM



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T9H 1V3

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SUSAN@THELOREGROUP.COM
(780) 714 - 1060

TRISTAN PARKER REALTOR[®]
TRISTAN@THELOREGROUP.COM
(780) 799 - 1509

JUDICIAL SALE | 145 MACDONALD CRESCENT

High-Exposure Industrial Property on 1.59 Acres with Two Warehouses in Mackenzie Industrial Park

PROPERTY INFORMATION

LIST PRICE: \$3,999,999

LEGAL ADDRESS: Plan: 7620533, Block: 20, Lot: 4

MUNICIPAL ADDRESS: 145 MacDonald Crescent
Fort McMurray, AB T9H 4B3

ZONING: BI (Business Industrial)

LOCATION: MacKenzie Industrial Park

The property is strategically located in the southeast sector of Fort McMurray, offering direct access to Highway 69 and close proximity to Highway 63, the Fort McMurray International Airport, and the downtown core.

PROPERTY SIZE:

Combined Bldg A & B: 14,400 SF (+/-)

- Building 1: 6,000 SF
- Building 2: 8,400 SF

Site: 1.59 Acres



PROPERTY HIGHLIGHTS:

- Secure gravelled yard with excellent functionality
- Ample paved on-site parking
- Eleven (11) grade-level overhead doors between both buildings
- Drive-in and drive-through wash bays
- ±20' ceiling heights
- 3-phase power and make-up air
- Strong exposure along MacDonald Crescent
- Efficient site circulation suitable for industrial & logistics users

The buildings provide a practical balance of warehouse and office space, with reception areas and washrooms already in place to support day-to-day operations. This is a rare opportunity to secure a yard-oriented industrial property with multiple buildings, strong access, and exceptional functional fundamentals in one of Fort McMurray's most established industrial parks.

BUILDING A: 6,000 SF (+/-)

OFFICE AREA:

- Three (3) offices on the main floor
- One (1) washroom on the main floor plus one (1) washroom in the mezzanine
- One (1) kitchenette/staff area (no running water)
- One (1) main reception area
- Two (2) dedicated electrical rooms
- One (1) staff room located in the mezzanine

WAREHOUSE / BAY LAYOUT – BUILDING A:

Five (5) grade-level warehouse bays configured as follows:

- One (1) drive-through bay, allowing efficient in-and-out circulation
- Two (2) independent bays with rear access, ideal for separate operations or secure storage
- Two (2) bays combined into a larger contiguous warehouse area, suitable for heavier industrial use or larger equipment

BUILDING B: 8,400 SF (+/-)

OFFICE AREA:

- Three (3) offices located on the upper level
- Two (2) half washrooms on the main floor
- One (1) full washroom on the upper level
- One (1) boardroom on the upper level
- One (1) kitchenette/staff room on the upper level
- One (1) main reception area
- Two (2) rear storage rooms with direct access to the bays

WAREHOUSE / BAY LAYOUT – BUILDING B:

Five (5) grade-level warehouse bays configured as follows:

- One (1) demised bay located at the far left, ideal for a separate division or specialty use
- Four (4) bays combined into one large clear-span warehouse, providing excellent flexibility for fleet servicing, logistics, or bulk storage

JUDICIAL SALE | 145 MACDONALD CRESCENT

High-Exposure Industrial Property on 1.59 Acres with Two Warehouses
in Mackenzie Industrial Park

Fort McMurray Wood Buffalo Canada's Energy Capital

—A Market Built on Industry, Income and Long-Term Growth

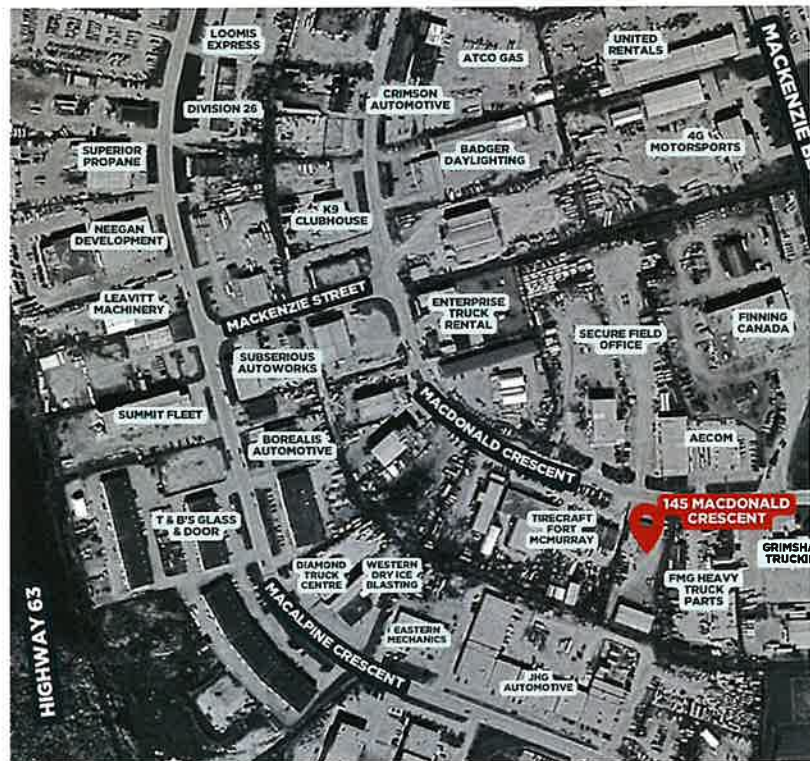
Fort McMurray Wood Buffalo is one of Canada's most important economic regions and serves as the operational centre of the Athabasca Oil Sands. The area is home to major global energy producers including Suncor Energy, Canadian Natural Resources Limited, Imperial Oil, and Cenovus Energy, along with hundreds of supporting service, logistics, construction, and technology companies.

This industrial base drives a high-income workforce and strong consumer spending, supporting consistent demand for retail, hospitality, healthcare, professional services, and commercial development. As the regional hub for northern Alberta's energy sector, Fort McMurray continues to attract investment, skilled labour, and long-term infrastructure development.

Alberta's competitive business environment further strengthens the region's investment appeal, highlighted by Canada's lowest corporate tax rate at 8% and municipal initiatives designed to encourage private development.

Fort McMurray Wood Buffalo continues to present strong opportunities across multiple sectors including retail, mixed-use development, hospitality, healthcare, restaurants, logistics and distribution, automotive retail, technology-based commercial space, and cultural tourism destinations.

With sustained industrial activity, a growing permanent population, and one of the highest household income levels in Canada, Fort McMurray Wood Buffalo continues to evolve into a stable regional centre offering long-term opportunities for commercial investment and development.



KEY MARKET INDICATORS

Oil Sands Reserves
(Third Largest Proven Reserves in the World)
165+ Billion Barrels

Share of Canadian Oil Production
60-65%

Annual Oil Sands Capital Investment (2024)
\$13.3 Billion

Projected Contribution to Canadian GDP
\$1 Trillion over the next 11 years

Oil & Gas Workforce Presence
15% of Canada's Extraction Workforce

MARKET OPPORTUNITIES

ROBUST COMMERCIAL/RETAIL DEMAND

\$1.85B - \$3.23B

2022-2030

HIGH HOUSEHOLD INCOME

\$217,261

2023 Average

AVERAGE DISPOSABLE INCOME

\$151,589

2023 Average

OIL REMAINING IN THE ATHABASCA OIL SANDS

158 Billion

BARRELS

This means about 100 years of activity

**YOUNG AFFLUENT
CONSUMER BASE**

33.9

Median Age

TOTAL POPULATION

107,740

2025

PRIVATE DWELLINGS

32,062

2025

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SUSAN@THELOREGROUP.COM

(780) 714 - 1060

TRISTAN PARKER REALTOR®

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(780) 799 - 1509



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T9H 1V3

JUDICIAL SALE | 145 MACDONALD CRESCENT

High-Exposure Industrial Property on 1.59 Acres with Two Warehouses in Mackenzie Industrial Park

BUILDING A:



JUDICIAL SALE | 145 MACDONALD CRESCENT

High-Exposure Industrial Property on 1.59 Acres with Two Warehouses
in Mackenzie Industrial Park

BUILDING B:



This is **Exhibit "C"** referred to in the
Affidavit of Susan Lore
Sworn before me ~~on~~ the 19th day of June, 2026

Amaan Suleman
to ✓ this ✓

A Commissioner for Oaths in and for Alberta

Amaan Suleman
Student-at-Law





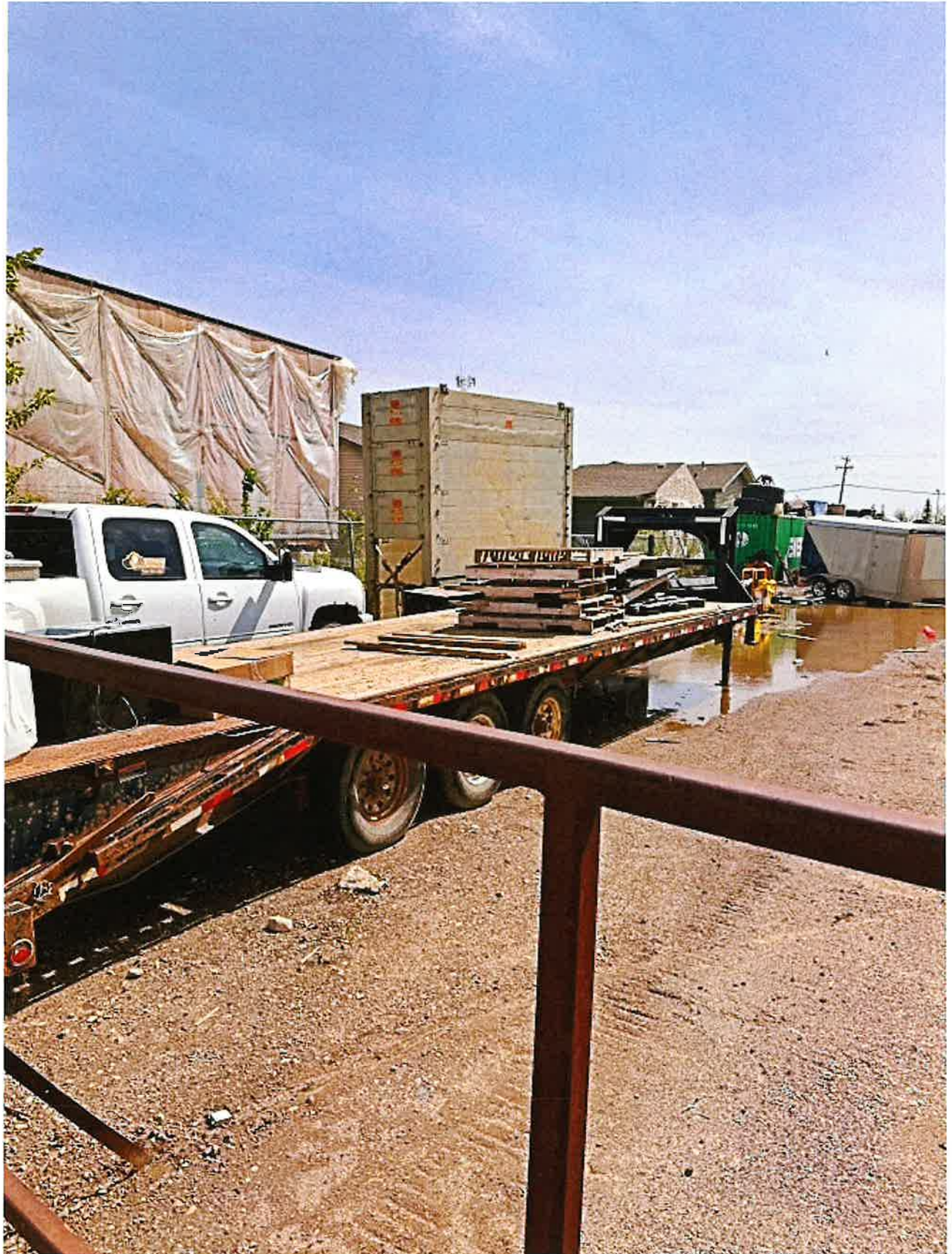
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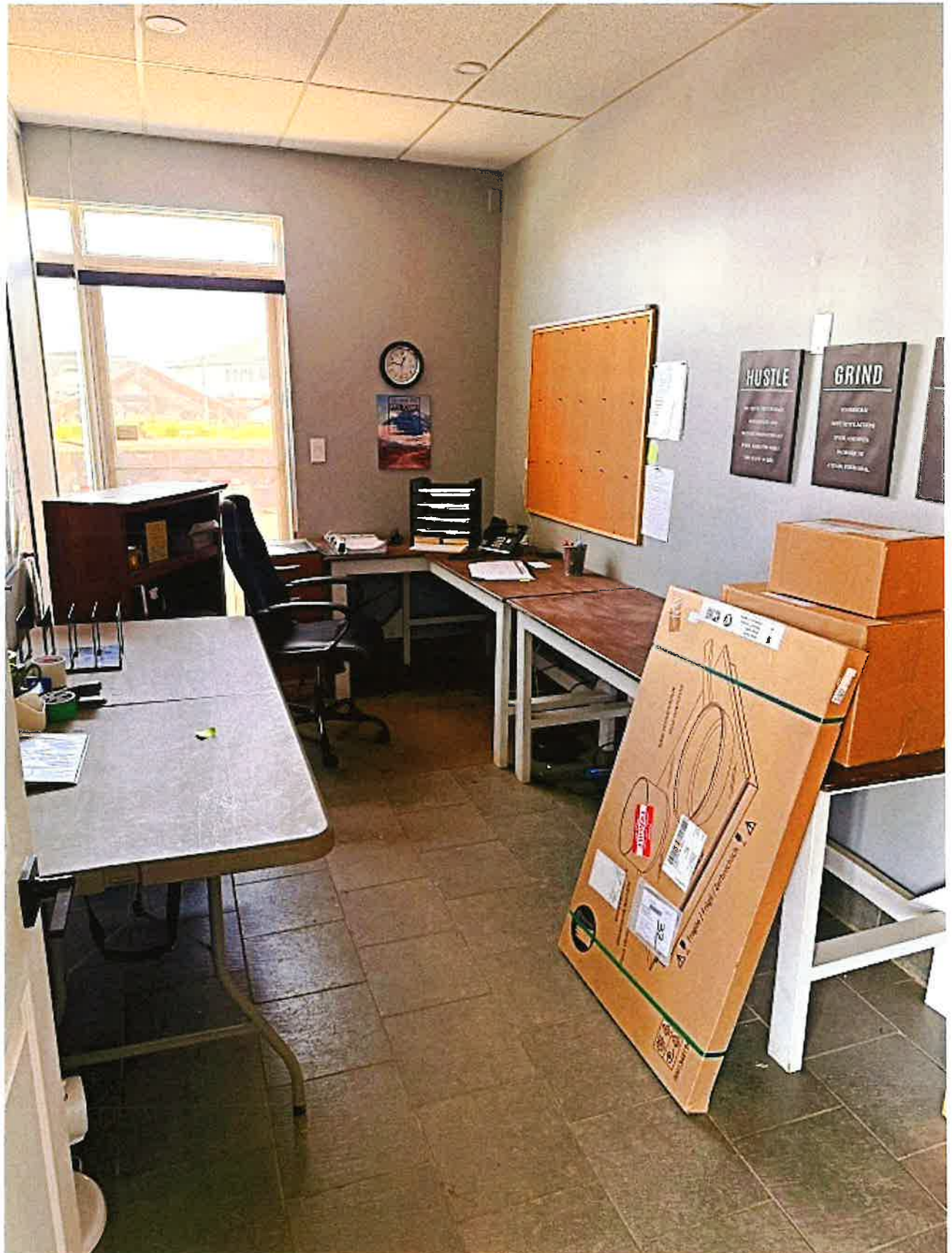
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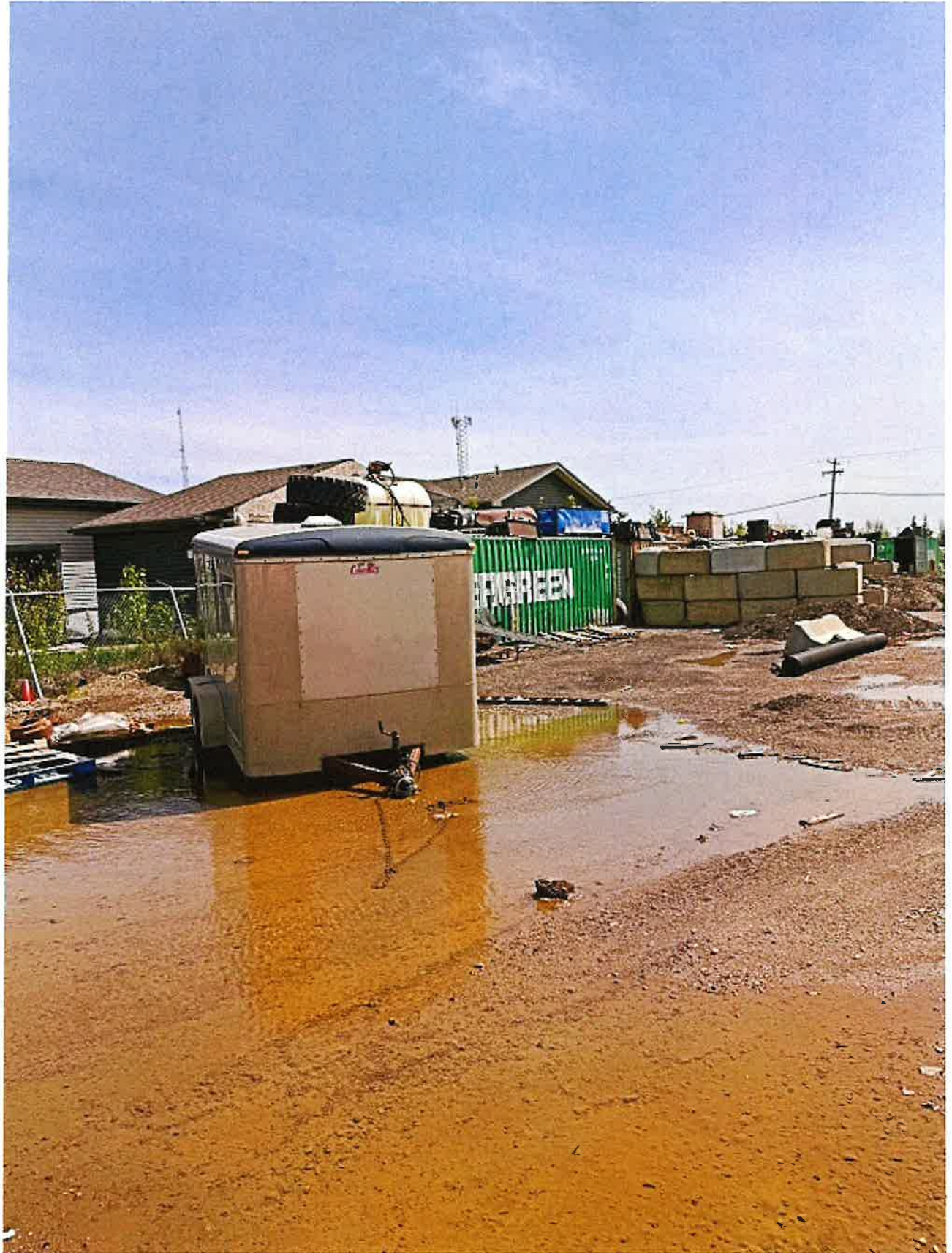
Amaan Suleman

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Amaan Suleman
Student-at-Law







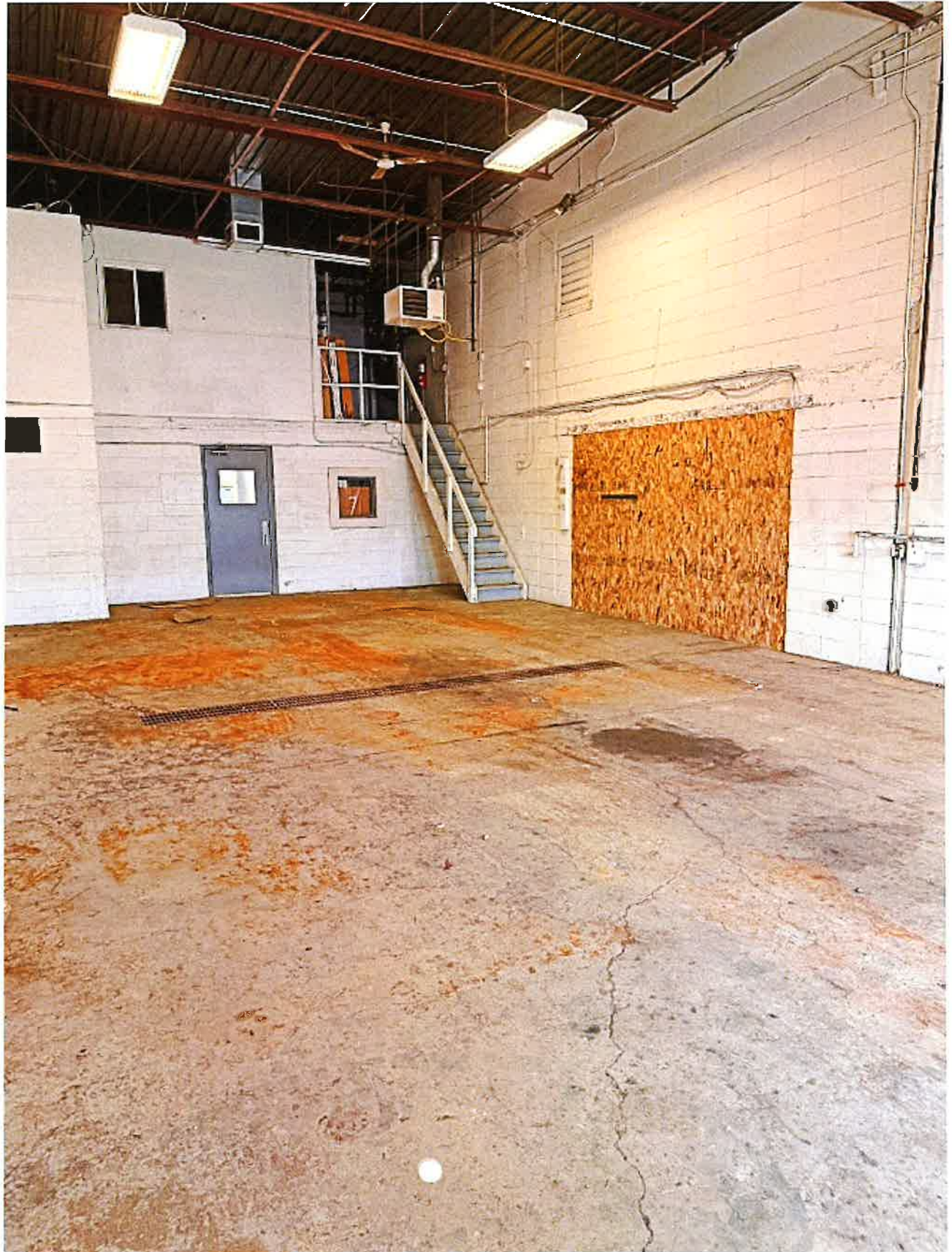










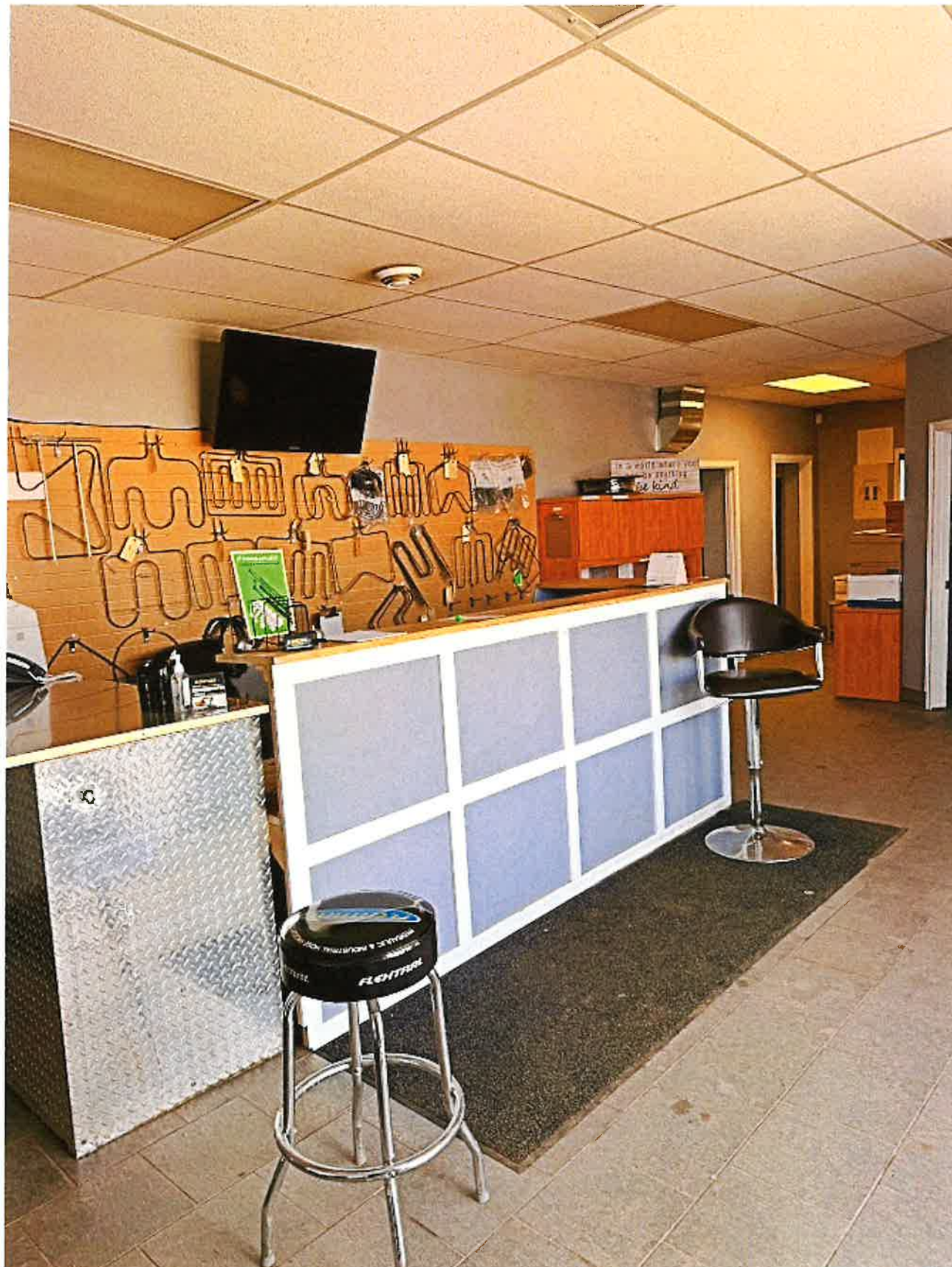






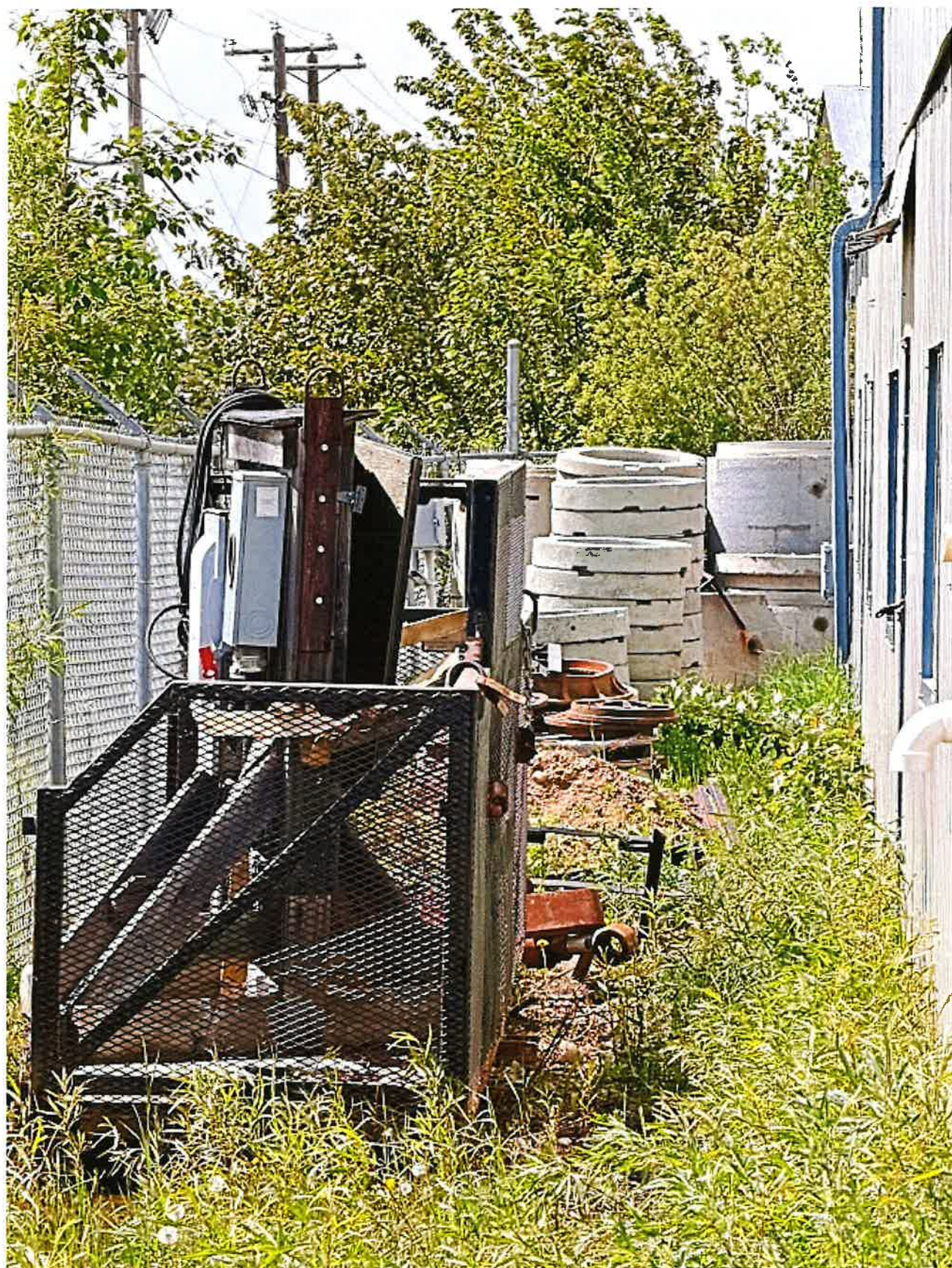


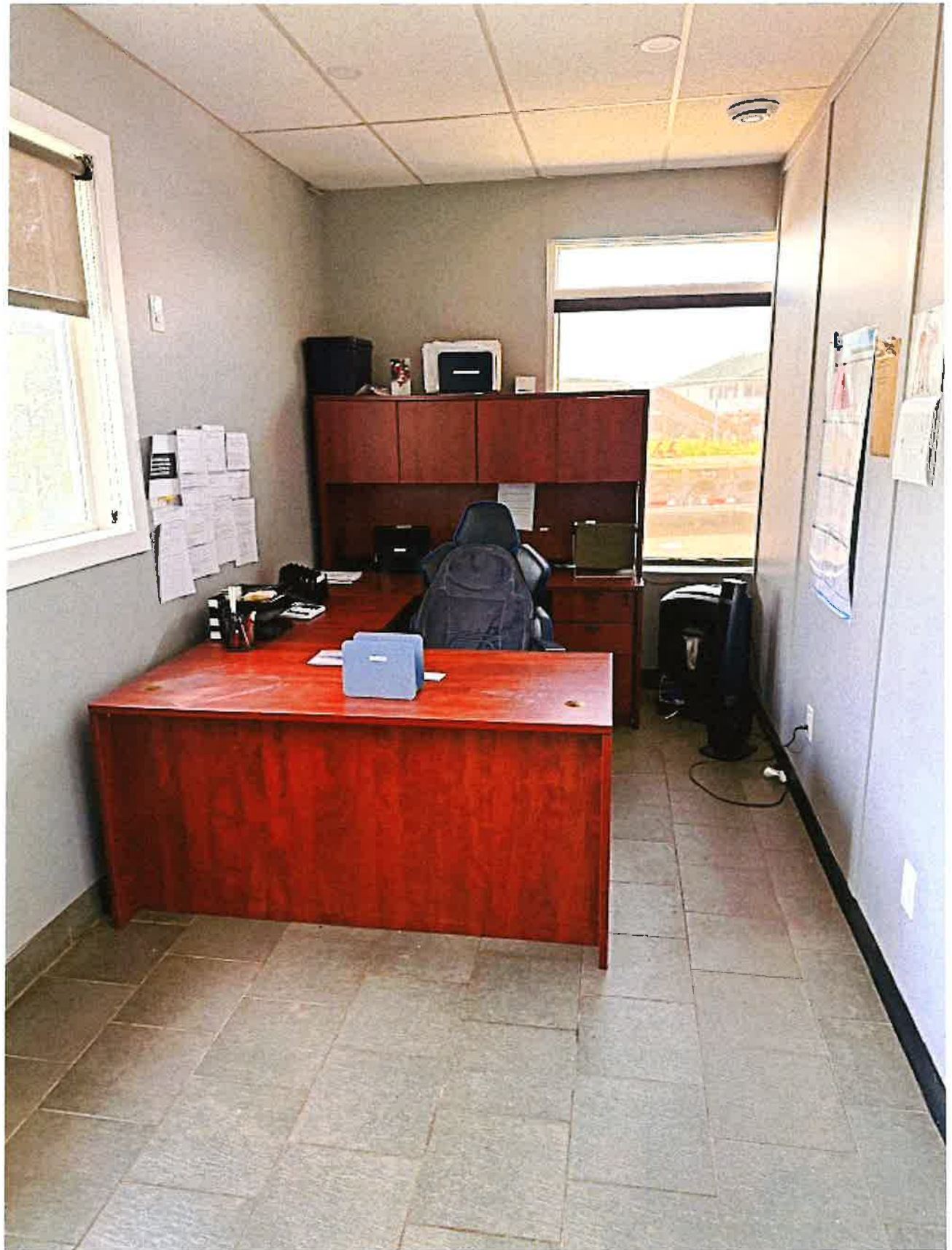






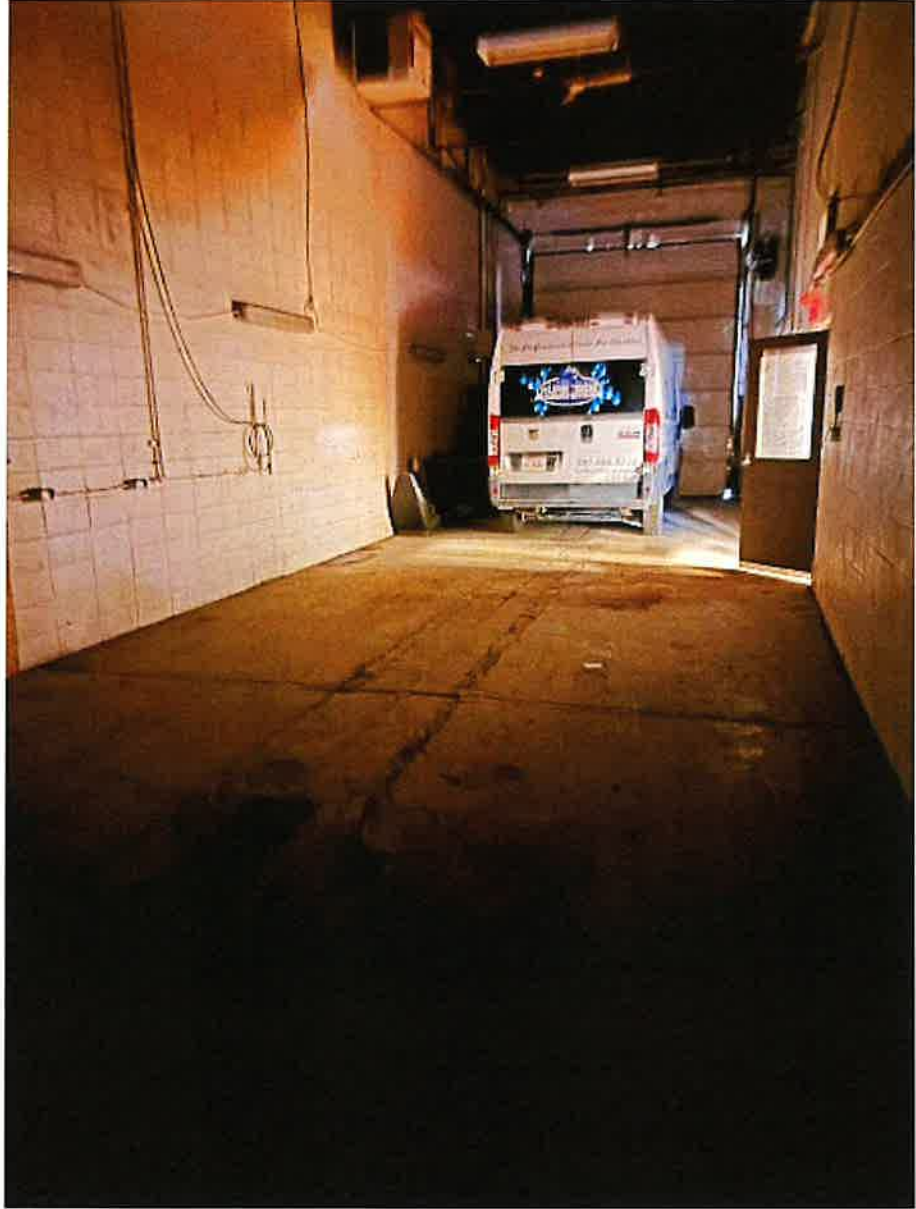










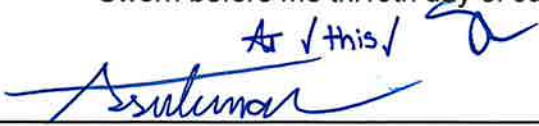








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At / this /


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Amaan Suleman
Student-at-Law

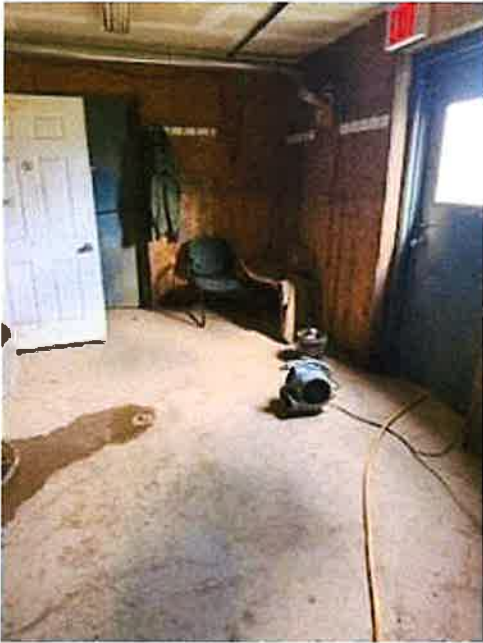
















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to ✓ this ✓ 



A Commissioner for Oaths in and for Alberta

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Student-at-Law





