



Affidavit #2 of Wen-Shih Yang
Made on February 25, 2026

NO. S-261320
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

ROYAL BANK OF CANADA

PLAINTIFF

AND:

WESTCOAST APPLIANCE CENTRE 2014 LTD.
CAPITAL IRON (2022) LTD.
ARAM HOLDINGS LTD.
TAHAMTAN ARAM ALSO KNOWN AS FRED ARAM

DEFENDANTS


AFFIDAVIT

I, WEN-SHIH YANG, of 20th Floor, 250 Howe Street, Vancouver, British Columbia, Paralegal, AFFIRM THAT:

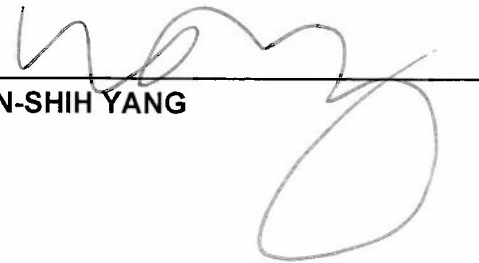
1. I am a Paralegal employed by the law firm of Dentons Canada LLP, solicitors for the Plaintiff, and as such have personal knowledge of the matters and facts herein deposed to except where stated to be on information and belief and where so stated do verily believe the same to be true.

2. Attached hereto and marked as **Exhibit "A"** is a copy of an email correspondence between Chris Bowra of BDO Canada Limited, the proposed receiver, and Sherryl Dubo, counsel for the Plaintiff.

AFFIRMED BEFORE ME at Vancouver,
British Columbia, on February 25, 2026.




A Commissioner for taking Affidavits
in the Province of British Columbia.



WEN-SHIH YANG

CHLOE DUCLUZEAU
Barrister & Solicitor
DENTONS CANADA LLP
20th Floor, 250 Howe Street
Vancouver, B.C. V6C 3R8
Telephone (604) 687-4460

This is **Exhibit "A"** referred to in the affidavit of Wen-Shih Yang made before me at Vancouver, British Columbia on this the 25th day of February, 2026.


A Commissioner for taking Affidavits
for British Columbia

Yang, Dannis

From: Bowra, Chris <cbowra@bdo.ca>
Sent: Wednesday, February 25, 2026 1:56 PM
To: Dubo, Sherryl; Watson, Eamonn
Cc: Chan, Martin
Subject: Westcoast / Capital Iron points

[WARNING: EXTERNAL SENDER]

Sherryl / Eamonn,


Here is our understanding of the current situation:

- 1) Both the Westcoast Appliance and Capital Iron locations have been closed down, and the employees have been notified that the businesses are closed down as of Friday, Feb 20, 2026.
- 2) There is a sign on the door at each location instructing customers to contact BDO as the Receiver.
- 3) Able Auctions has done drive by's of the premises and confirmed the operations are closed.
- 4) In speaking with a former employee, all employees were instructed to turn in their keys, and the alarm system has been armed (we do not know if there are still keys out there). The former employee informed us that all company owned vehicles have been returned to the leased premises. Employees were terminated, however they are owed approximately 2 weeks worth of wages and they are waiting for further instructions, including details of the WEPP program.
- 5) There are approximately 530 customer deposits for appliances / furniture. The amount of the deposits ranges from 50% of the total price to 100% of the purchase price and total about \$1.8 million. BDO doesn't have any visibility as to who these items are financed by, and a significant amount of work will be required to determine to priority to this inventory. It's our understanding that the customer deposit information is stored on the companies POS system, however we're also informed that software may expire shortly due to non-payment.
- 6) On Feb 24, 2026, we've been informed from a former employee that they cannot access the server or company email, access would be required to produce inventory reports and company records. This may also impact the ability to access the companies POS system as well.
- 7) Our understanding is that inventory supplied by Cantrex or Wells Fargo is typically paid for over a 2 - 4 month period, ie anything over 4 months may no longer be subject to the PMSI's of Cantrex or Wells Fargo. Based on our review of an inventory schedule provided by the company to RBC, the majority of the inventory supplied by Cantrex and Wells Fargo has been on hand for over 4 months. The point is that based on our understanding, Cantrex would not be able to simply come in remove everything that is a brand they supply given a significant portion of their inventory may not be subject to their security (at least in a first ranking position).
- 8) As of 2pm, Feb 25, 2026, BDO has been contacted by over 20 different customers worried about their deposits and / or requesting the items that they have paid for.
- 9) We've been advised by the owner, Fred Aram that the keys were turned into the respective landlords. We don't know if all keys were actually collected. One of the landlords has confirmed that they've changed the locks, however the other landlord has confirmed that that they have not changed the locks.
- 10) There has been very limited cooperation from the principal, Fred Aram and going forward we don't anticipate further assistance.
- 11) We don't know what, if any insurance policy is currently in place.

Please let me know if you'd like any other details.

Chris Bowra, CA, CIRP
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BDO Canada Limited
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