

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 OF GREGORY HUSSEY

SUMMARY OF CURRENT DOCUMENT	
Court File Number:	2025 01G 0491
Date of Filing of Document:	04 June 2025
Name of Filing Party or Person:	Applicants
Application to which Documents Being Filed Relates:	Notice of Motion filed by the Applicants
Statement of Purpose of Filing:	To support the Applicants' motion for approval for sale of properties
Court Sub-File Number, if any:	N/A

I, **GREGORY HUSSEY**, of Paradise, Newfoundland and Labrador, **MAKE OATH AND SAY THAT:**

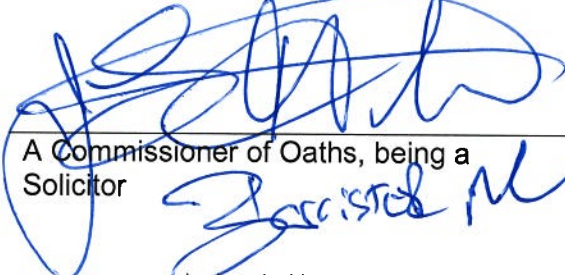
1. I am the President and a Director of the Applicants, and as such I have direct knowledge of the Applicants' business and financial affairs.
2. This Affidavit is sworn in support of the Applicants' Motion, which I have reviewed. The facts contained therein are true to the best of my knowledge, information, and belief. Where the

information provided herein is not based on my direct knowledge, I have indicated the third-party source for that information.

3. As set out in their Motion, the Applicants seek approval for the sale of properties subject to Agreements of Purchase and Sale ("**APS**") entered prior to the Applicants' CCAA filing. The properties in question are located in Paradise, Newfoundland and Labrador at 61 Silver Birch Crescent ("**61 Silver Birch**"), 63 Silver Birch Crescent ("**63 Silver Birch**"), 70 Silver Birch Crescent ("**70 Silver Birch**") and 41 Yellowwood Drive ("**41 Yellowwood**").
4. The APS, including amendments pertaining to the proposed sale of properties, are attached hereto as confidential exhibits as follows:
 - Confidential Exhibit "A"** - 61 Silver Birch, dated 31 May 2023;
 - Confidential Exhibit "B"** - 63 Silver Birch, dated 16 April 2023;
 - Confidential Exhibit "C"** - 70 Silver Birch, dated 12 July 2023; and
 - Confidential Exhibit "D"** - 41 Yellowwood, dated 23 April 2024.
5. The parties to the 61 Silver Birch APS are Karwood Contracting Ltd. (Vendor) and Lynn Mugoro (Purchaser). The proposed purchase price as set out in the APS reflects fair market value.
6. The parties to the 63 Silver Birch APS are Karwood Contracting Ltd. (Vendor) and Stephen Brown and Karissa Brown (Purchasers). The proposed purchase price as set out in the APS reflects fair market value.
7. The parties to the 70 Silver Birch APS are Karwood Contracting Ltd. (Vendor) and Brenda Burke (Purchaser). The proposed purchase price as set out in the APS reflects fair market value.

8. The parties to the 41 Yellowwood APS are Karwood Contracting Ltd. (Vendor) and Mark Hefferman (Purchaser). The proposed purchase price as set out in the APS reflects fair market value.
9. It is the Applicants' position, which I understand to be supported by the Monitor, that the approval of the proposed sales is in the best interest of all stakeholders.

SWORN TO at St. John's)
Newfoundland and Labrador, this 20th)
day of June 2025, before me:)


A Commissioner of Oaths, being a
Solicitor

Joshua L. Hancott
Barrister, Solicitor, and Notary Public
Newfoundland and Labrador



GREGORY HUSSEY