

This is the 1<sup>st</sup> affidavit  
of Todd Scarlett in this case  
and was made on August 21, 2026



NO. 265911  
VANCOUVER REGISTRY

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

BETWEEN:

BDO CANADA LIMITED in its capacity  
as the Trustee of the Bankruptcy Estates of  
CRAIG ALLEN SMITH and ROBERT KYLE SMITH

PETITIONER

AND:

BASTIAN HOLDINGS LTD.  
KRYSTLE HOLDINGS LTD.  
1226745 B.C. LTD.  
SKAW PROPERTIES LTD.  
207-53 HASTINGS STREET HOLDINGS LTD.  
1226734 B.C. LTD.  
27222 LOUGHEED HIGHWAY LTD.  
WHITEWATER STEELERS REINFORCING LTD.

RESPONDENTS

**AFFIDAVIT**

I, Todd Scarlett, Realtor of Colliers Macaulay Nicolls Inc., c/o #1100 – 1067 West Cordova Street, in the City of Vancouver, in the Province of British Columbia, MAKE OATH AND SAY AS FOLLOWS:

1. I am the realtor who holds the listing of the property situated at 27222 Lougheed Highway, Maple Ridge (the “**Lands**”), which is subject to this proceeding and as such have personal knowledge of the matters hereinafter deposed to save and except where stated to be upon information and belief and where so stated I verily believe the same to be true.
2. I am a licensed real estate agent, and was retained by BARRY CHARLES HOLDINGS LTD., BECISION HOLDING CORPORATION, G.I.H. PROPERTIES LTD., MCVICAR & COMPANY HOLDINGS INC., TNL DEVELOPMENTS LTD., AMAN GILL, PETER CHAPPELL, SANDRA CHAPPELL, and TERESA GAUTREAU to list and market the Lands. Attached as Exhibit "A" is a true copy of a Marketing Report dated August 21, 2026 which I prepared to set forth the particulars of the state, condition, and marketing of the Lands. The facts set out therein are true.
3. I have not now and never have had any interest in the Lands, except in connection with the marketing and sale of the said Lands as described herein.

4. I will continue to list and market the lands until a sale has been approved by the Court.

SWORN BEFORE ME in the City of  
Vancouver, in the Province of British  
Columbia, this 21<sup>st</sup> day of August, 2026.

  
\_\_\_\_\_  
A Commissioner for taking  
Affidavits within British Columbia

  
\_\_\_\_\_  
Todd Scarlett

**BRIAN C. MARKUS**  
*Barrister & Solicitor*  
SUITE 930 - 777 HORNBY STREET  
VANCOUVER, B.C.  
CANADA V6Z 1S4

This is Exhibit "A" referred to in  
the affidavit of Todd Scarlett  
sworn before me at Vancouver  
in the Province of British Columbia  
this 21 day of August, 2026

.....  
A Commissioner for taking Affidavits  
within British Columbia

# Marketing Progress Report

27222 Lougheed Highway, Maple Ridge

|             |                    |               |                                                       |
|-------------|--------------------|---------------|-------------------------------------------------------|
| Date        | August 21, 2026    | Prepared For  | Mandate Mortgage Corp. &<br>Brian C. Markus Law Corp. |
| Prepared By | Todd Scarlett PREC | Report Period | August 2026                                           |

## Marketing Activity — Status Overview

The following table outlines all marketing activities deployed to date and planned activities, including timing and current status.

| Marketing Activity                         | Timing               | Status               |
|--------------------------------------------|----------------------|----------------------|
| Brochure Production                        | Week 1               | Complete             |
| Signage Installation                       | Week 1               | Complete             |
| ColliersCanada.com Listing                 | Week 2 – ongoing     | Complete and ongoing |
| Initial Cold Call & Door knocking Campaign | Week 2 – ongoing     | Ongoing              |
| Target Market Email Campaign               | Week 2 –ongoing      | Ongoing              |
| Follow-Up Phone Calls to eBlast Recipients | Week 3 – ongoing     | Ongoing              |
| Email Campaign to Brokerage Community      | Week 2–3 and ongoing | Ongoing              |
| Social Posts                               | Week 3               | Ongoing              |
| BIV.com Ads                                | Week 3 – 6           | Complete and ongoing |
| Western Investor Ads                       | Week 3 – 6           | Complete and ongoing |
| Social Media Campaigns                     | Week 2+              | Ongoing              |
| LoopNet / CoStar / Spacelist Listings      | Week 3 – ongoing     | Ongoing              |
| Digital Marketing Campaign                 | Week 2 – ongoing     | Complete and ongoing |
| eBlast – Brokerage Community               | Bi-weekly            | Ongoing              |
| eBlast – Occupier Groups                   | Bi-weekly            | Ongoing              |

## Completed Marketing Activities

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- Professional interior, exterior, and drone photography of the building completed prior to launch.
- Professional drone video and property flyover completed and linked to all materials.
- New exterior signage installed.
- New custom marketing brochure completed, designed, and published on ColliersCanada.com.
- Property presented and discussed at Colliers weekly industrial, office & investment sales meetings.
- Initial cold call and door knocking campaign commenced targeting industrial occupiers and investors across Metro Vancouver.
- Warm call follow-up campaign launched to all eBlast recipients.

## Targeted Prospecting

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|                                          |                                |
|------------------------------------------|--------------------------------|
| Fraser River Pile & Dredge               | Marine / Waterfront Industrial |
| Blue Water Systems                       | Marine / Waterfront Industrial |
| North Arm Transportation                 | Marine / Waterfront Industrial |
| Mercury Launch & Tug / Mercury Transport | Marine / Waterfront Industrial |
| Seaspan Marine                           | Marine / Waterfront Industrial |
| Arrow Marine Services                    | Marine / Waterfront Industrial |
| Tidewater Canada                         | Marine / Waterfront Industrial |
| Marcon                                   | Heavy Fabrication / Steel      |
| Ideal Welders                            | Heavy Fabrication / Steel      |
| Pacific Industrial & Marine (PIM)        | Heavy Fabrication / Steel      |
| Majestic Bridge Building                 | Heavy Fabrication / Steel      |
| Priority Steel Erectors                  | Heavy Fabrication / Steel      |

|                                          |                                               |
|------------------------------------------|-----------------------------------------------|
| Valard Construction                      | Civil / Utility / Infrastructure              |
| Complete Utility Contractors             | Civil / Utility / Infrastructure              |
| ABC Recycling                            | Recycling / Industrial Processing             |
| Richmond Steel Recycling                 | Recycling / Industrial Processing             |
| AMIX Recycling                           | Recycling / Industrial Processing             |
| Allied Salvage & Metals                  | Recycling / Industrial Processing             |
| Riverside Recycling LTD.                 | Recycling / Industrial Processing             |
| Pan Pacific Recycling Inc                | Recycling / Industrial Processing             |
| Intelligent City                         | Prefab Housing                                |
| Fort Modular Inc.                        | Prefab Housing                                |
| Black Diamond Group (Britco)             | Prefab Housing                                |
| Freeport Industries                      | Prefab Housing                                |
| BC Passive House                         | Prefab Housing                                |
| StructureCraft                           | Prefab Housing                                |
| Kiewit Corporation                       | Construction – Public/ Private Infrastructure |
| Mainland Group of Companies              | Construction and Civil Works                  |
| Mainland Sand and Gravel                 | Aggregate Supply                              |
| Southern Railway of BC                   | Rail Operator                                 |
| Reagle Terminals                         | Rail / Truck / Barge Transload                |
| Tom-Mac Shipyards Ltd.                   | Ship Repair / Marine Services                 |
| Meridian Marine Industries Inc.          | Ship Repair, Steel Fabrication                |
| Bracewell Marine                         | Ship Repair, Fabrication, Machining           |
| Tri-R Transport                          | Transload / Logistics / Barge                 |
| S&R Sawmills                             | Lumber / Sawmill                              |
| Mill & Timber Products                   | Lumber / Sawmill                              |
| Teal Jones                               | Forestry / lumber manufacturing               |
| Ledcor Marine                            | Tug/ Barge / Construction                     |
| Graham Construction                      | Construction – Public/ Private Infrastructure |
| Harken Tugboat and Barge Marine Services | Tug/ Barge / Forestry                         |
| Delta Tug & Barge                        | Tug/ Barge / Marine Support                   |
| Tidewater Canada                         | Tug/ Barge / Bulk Liquids                     |
| Lafarge Canada                           | Cement / Aggregates                           |

|                               |                                   |
|-------------------------------|-----------------------------------|
| Heidelberg Materials / Lehigh | Cement / Aggregates               |
| Ocean Concrete                | Cement / Aggregates               |
| B & B Contracting Group       | Construction/ Cement / Aggregates |
| Jack Cewe Construction        | Aggregates / Civil Construction   |
| Schnitzer / Radius Recycling  | Scrap Metal / Recycling           |
| ABC Recycling                 | Metal Recycling                   |
| Hall Constructors             | Heavy Civil / Earthworks          |
| NorLand Limited               | Heavy Civil / Infrastructure      |
| FlatironDragados              | Major Infrastructure              |
| Jacob Bros Construction       | Heavy Civil                       |
| PCL Constructors              | Major Construction                |
| Fraser Pacific Enterprises    | Barge/ Transload                  |

## Prospect & Tour Activity

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- LMS Reinforcing Steel Group submitted a Letter of Intent on August 19<sup>th</sup>, 2026.
- 1020351 BC Ltd. (Megatech Engineering Ltd.) submitted an Offer to Purchase on August 7<sup>th</sup>, 2026. Megatech was made aware of pending competing interest and submitted their offer on a “best foot forward” basis. Nonetheless we countered this Offer to test their limits, and they responded with original terms. This Offer was accepted on August 20<sup>th</sup>, 2026
- **NOTE:** LMS Reinforcing Steel Group would have required vacant possession. Megatech Engineering’s intent is to restructure the existing tenant’s (A&H Steel) lease based on existing financial / business terms such that A&H Steel can remain in place for the duration of their existing lease term, however no further renewal options will be provided.
- **NOTE:** The Property has been listed since March of 2025 on behalf of Skaw Properties Ltd. and since June 2026 on behalf of Brian C. Markus Law Corp. at \$25,999,000.
- **NOTE:** With the MOTI upgrades to Loughheed Highway a new controlled rail crossing will be required at the east end of the Property. Design and budget has been created by Skaw Properties, MOTI and CPKC Rail and is estimated to be approximately \$1,500,000+. Offers received are reflective of that cost to ultimately be borne by Purchaser.

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RESPONDENTS

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**AFFIDAVIT #1 OF TODD SCARLETT**

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BCM/HAF