

CANADA  
PROVINCE OF SASKATCHEWAN

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Court No.: Q.B. No. 872 of 2020  
Estate No.: 23-2654754

COURT OF QUEEN'S BENCH FOR SASKATCHEWAN  
IN BANKRUPTCY AND INSOLVENCY

JUDICIAL CENTRE                      SASKATOON

APPLICANT                              101100090 SASKATCHEWAN LTD.

IN THE MATTER OF SECTION 50.4 OF THE *BANKRUPTCY AND INSOLVENCY ACT*, RSC 1985, C.  
B-3, AS AMENDED

AND IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF 101100090  
SASKATCHEWAN LTD.

**AFFIDAVIT OF RYAN KOLIBAB**

I, Ryan Kolibab, of the City of Saskatoon, in the Province of Saskatchewan, businessperson, make oath and say as follows that:

1. I am the sole director, shareholder and president of the Applicant, 101100090 Saskatchewan Ltd. (the "**Company**"), such that I have personal knowledge of the facts and matters hereinafter deposed to, except where stated to be on information and belief, and whereso stated, I believe the same to be true.

**ONGOING EFFORTS BY THE COMPANY TO DEVELOP A VIABLE PROPOSAL FOR PRESENTATION TO ITS CREDITORS**

2. Since the 45-day extension granted by this Honourable Court pursuant to the July 23, 2020, Order of the Honourable Mr. Justice Scherman, the Company has continued to act in good faith and with due diligence to prepare a proposal for presentation to its creditors, the particulars of which efforts are discussed below. I believe it to be true that, based on these ongoing efforts, the granting of the further extension sought herein will not materially prejudice any of the creditors of the Company.

**Ongoing Communication with Stakeholders**

3. The Company, with the assistance of its counsel, has continued to be in regular communication with its stakeholders, including its secured creditors and various unsecured creditors, in order to keep them informed and attempt to garner support for these proceedings. As I stated in my Affidavit filed in support of the first extension of the NOI period, the majority of the stakeholders have either indicated their support or, at minimum, have adopted a "wait and see" approach".
4. The Company has worked with its counsel to manage various challenges that arose as a result of misperceptions by certain stakeholders and third parties regarding the NOI process, in order to safeguard the reputation and business of the Company.

**Business Development Activities**

5. Since the filing of the NOI, the Company has continued to work with its recently-retained business and personal development team regarding management oversight and operational procedures, to ensure that the Company has the stability it requires to perform its proposal and succeed in the future.

**Collection of Accounts Receivable**

6. The Company has continued to expend good faith efforts to collect its accounts receivable.

**Payment of Payroll Obligations**

7. The Company has continued to ensure that all of its payroll obligations have remained current, including remittance of all source deductions as they become due. The Company expects to continue to meet these payroll liabilities as they become due during the proposal period.

**Commencement of Preparation of Draft Proposal to Creditors**

8. The Company continues to work with its counsel, with assistance from the Proposal Trustee, to prepare a draft Proposal to Creditors, with the objective of having a Proposal finalized and presented for approval at the earliest opportunity.

**Satisfaction of and Adherence to Reporting Obligations**

9. The Company has extended its Cash Flow Statements through to the period ending October 31, 2020, as appended to the Second Report of the Proposal Trustee. Moreover, the Company has provided the Proposal Trustee with access to all of its books, records and other information required by the Proposal Trustee to assess and report on the business and financial affairs of the Company.

**Negotiations with Affinity Credit Union**

10. The Company and its counsel have continued negotiations with Affinity Credit Union. The Company expects to conclude such negotiations shortly.

**CONCLUSION**

11. To the best of my knowledge, information and belief, no creditor of the Company would be materially prejudiced if the Company were provided with an extension of time of 45 days (i.e., until 11:59 p.m. Saskatchewan Time on Saturday, October 24, 2020) to file a proposal to its creditors with the Official Receiver.

