

May 30, 2022

VIA ORDINARY MAIL

**To: THE POTENTIAL CLAIMANTS OF WG DOMAINE NIAGARA INC AND WG VINEYARD NIAGARA INC.**

Dear Sirs/Madam:

**PLEASE TAKE NOTICE** that, pursuant to an Order of the Ontario Superior Court of Justice (the "**Court**") made on May 25, 2022 (the "**Claims Bar Order**"), a claims bar process for monetary Claims has been established, and the Liquidator has been authorized to call for and receive Claims as set forth below. Terms not otherwise defined herein shall have the meaning given to them in the Claims Bar Order. A copy of the Claims Bar Order, including the Claims Procedure attached thereto (which contains the complete terms that govern the claims bar process), can be accessed from the Liquidator's website, located at:

<https://mnpdebt.ca/en/corporate/corporate-engagements/wg-vineyard-niagara-inc-and-wg-domaine-niagara-inc>

The Liquidator advises that all claimants of WG Domaine Niagara Inc. ("**WG Domaine**") and WG Vineyard Niagara Inc ("**WG Vineyard**" and together with WG Domaine the "**Companies**") must prove their claims against the Companies in order to share in any distribution of the proceeds realized by the Liquidator from the property of the Companies.

To facilitate the filing of claims, we attach hereto a blank copy of the prescribed claim form (the "**Claim Form**"). To be accepted by the Liquidator, the Claim Form **MUST** be fully completed and executed in accordance with the Claim Form by the Claimant or an authorized signing officer, then **DELIVERED** to the Liquidator, together with **ALL** necessary supporting documentation attached, **PRIOR TO 5:00 p.m. (Toronto time) on Monday, July 4, 2022** (the "**Claims Bar Date**"). **Any and all holders of Claims who do not deliver a Claim Form to the Liquidator by the Claims Bar Date shall not be entitled to share in any distribution of the proceeds realized by the Liquidator from the assets of the Companies and their claim shall be barred and extinguished forever.**

Additional Claim Forms can be found at the Liquidator's website noted above or by contacting the Liquidator at the address noted below. All inquiries with respect to this claim bar process, should be directed to:

MNP LTD.

Court-appointed Liquidator of WG Domaine Niagara Inc. and  
WG Vineyards Niagara Inc.

111 Richmond Street West, Suite 300

Toronto, ON M5H 2G4 Canada

Attention: Fatemah Khalfan

Facsimile: (416) 323-5242

E-mail: [fatemah.khalfan@mnp.ca](mailto:fatemah.khalfan@mnp.ca)

Yours truly,

**MNP LTD.,**

in its capacity as Court-appointed

Liquidator of WG Domaine Niagara Inc. and WG Vineyards Niagara Inc.,  
and not in its personal or corporate capacity

Per: 

Sheldon Title, CPA, CA, CIRP, LIT

Senior Vice President

**THE MATTER OF THE COURT-APPOINTED LIQUIDATION OF WG DOMAINE  
NIAGARA INC. AND WG VINEYARD NIAGARA INC.**

**CLAIMS FORM FOR CLAIMS BAR PROCESS**

**A. PARTICULARS OF CLAIMANT**

a) Full Legal Name of Claimant: \_\_\_\_\_  
\_\_\_\_\_

b) Mailing Address of Claimant:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

c) Other Contact Information of Claimant:

(i) Telephone Number: \_\_\_\_\_

(ii) Facsimile Number: \_\_\_\_\_

(iii) E-mail Address: \_\_\_\_\_

(iv) Attention (Contact Person): \_\_\_\_\_

**B. CLAIM AMOUNT:**

I, \_\_\_\_\_ [*Name of Claimant, if an individual or authorized representative of the Claimant, if a business*], of \_\_\_\_\_ [*Name of Business*] do hereby certify that:

(i) I am the Claimant or an authorized representative of the Claimant, holding the position of \_\_\_\_\_ [*Position or Title*] of the Claimant and have knowledge of all the circumstances connected with the Claim described herein; and

(ii) WG Domaine Niagara Inc. ("**WG Domaine**") was at its date of the appointment of the Liquidator, March 27, 2018, and is still indebted to the Claimant, less amounts collected or received to date, if any, on account of such indebtedness in the total amount of \$ \_\_\_\_\_ (in Canadian dollars).

(iii) WG Vineyard Niagara Inc. ("**WG Vineyard**") was at its date of the appointment of the Liquidator, March 27, 2018, and is still indebted to the Claimant, less amounts collected or received to date, if any, on account of such indebtedness in the total amount of \$ \_\_\_\_\_ (in Canadian dollars).

**C: PARTICULARS OF CLAIM:**

*You are required to provide full particulars of the Claim and copies of supporting documentation, including but not limited to the amount, description of the transaction(s) or agreement(s) giving rise to the Claim, name of any guarantor(s) which has guaranteed the Claim, and amount of Claim allocated thereto, date and number of all invoices, statements of account, particulars of all credits and discounts claimed, particulars of all payments received both pre and post the date of the appointment of the Liquidator associated with the indebtedness and counterclaims and set-offs by the Companies, description of the security, if any, granted by the Companies or title retention arrangement with the Companies and estimated value of such security or title retention arrangement, as applicable.*

**A description of the basis on which the Claims arose is as follows:**

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I attach the following documents which support the Claim and any claim for contract interest of other charges:

- (a)
- (b)
- (c)
- (d)

**D. FILING OF THE CLAIM**

This Claim Form must be received by the Liquidator by 5:00 p.m. (Toronto time) on the Claims Bar Date (July 4, 2022) at the following address:

MNP Ltd.  
Court-appointed Liquidator of Liquidator WG Domaine Niagara Inc.  
and WG Vineyard Niagara Inc.  
300 - 111 Richmond Street West  
Toronto, ON M5H 2G4

Attention: Fatemah Khalfan  
Facsimile: (416) 323-524  
Email: [Fatemah.Khalfan@mdp.ca](mailto:Fatemah.Khalfan@mdp.ca)

**Failure to file a Claim and any required supporting documentation, as outlined herein, by 5:00 p.m. (Toronto time) on the Claims Bar Date (July 4, 2022) will result in such Claim being forever barred and you will be prohibited from making or enforcing any Claim against either WG Domaine or WG Vineyard or any person who owes monies to WG Domaine or WG Vineyard in respect of which the Claimants claim as a beneficiary of a trust, actual or deemed or pursuant to a contract or agreement with WG Domaine or WG Vineyard or pursuant to statute (federal or provincial).**

Dated at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_, 2022

Witness

Per: \_\_\_\_\_  
Signature of Authorized Signing Officer

**INSTRUCTIONS FOR COMPLETING THE CLAIM FORM  
FOR CLAIMS BAR PROCESS**

This letter provides general instructions for completing the Claim Form.

- Ensure that you complete the full name and delivery address, including fax number and/or email address of the creditor making the claim.
- The Claim Form is incomplete unless you include a statement and description of the Claim and attach all supporting documents including statements of accounts and/or invoices in support. The supporting documents must show the date, number and value of all invoices or charges and must conform to the amount of the Claim.
- The Claim Form is incomplete unless it is signed and dated by you.
- The signed and completed Claim Form, together with all supporting documents, must be returned to the Liquidator, MNP Ltd., at the following address by 5:00 p.m. (Toronto time) on July 4, 2022.

**MNP LTD.**  
**Court-appointed Liquidator of WG Domaine Niagara Inc. and**  
**WG Vineyards Niagara Inc.**  
**111 Richmond Street West, Suite 300**  
**Toronto, ON M5H 2G4 Canada**

**Attention:** **Fatemah Khalfan**  
**Facsimile:** **(416) 323-5242**  
**E-mail:** [fatemah.khalfan@mnp.ca](mailto:fatemah.khalfan@mnp.ca)

- Pursuant to the order of the Honorable Justice Gibson, pronounced in the above noted proceedings on May 25, 2022 (the "**Claims Procedure Order**"), the Liquidator is entitled to disallow your Claim Form in whole or in part. If your Claim Form is disallowed in whole or in part, the Liquidator will send you a Notice of Revision or Disallowance along with the particulars as to how you may dispute the Notice of Revision or Disallowance. If you do not receive a Notice of Revision or Disallowance in accordance with the timelines set out in the Claims Procedure Order, the Liquidator has accepted your Claim Form.
- **Please contact the Liquidator at the address and email set out above if you have any questions about completing your Claim Form. Any failure to properly complete or return your Claim Form to the Liquidator at the above address by 5:00 pm. (Toronto Time) on July 4, 2022, will result in your Claim being extinguished without further entitlement to recover your Claim from the Companies.**