COURT FILE NUMBER

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COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE

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PLAINTIFF

ROYAL BANK OF CANADA

DEFENDANT

FAISSAL MOUHAMAD PROFESSIONAL CORPORATION, MCIVOR DEVELOPMENTS LTD., 985842 ALBERTA LTD., 52 DENTAL CORPORATION, DELTA DENTAL CORP., 52 WELLNESS CENTRE INC., PARADISE MCIVOR DEVELOPMENTS LTD., MICHAEL DAVE MANAGEMENT LTD., FAISSAL MOUHAMAD and FETOUN AHMAD, also

known as FETOUN AHMED

DOCUMENT

SUPPLEMENTAL AFFIDAVIT

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT WARREN SINCLAIR LLP 600, 4911 – 51 STREET RED DEER, AB T4N 6V4

ATTENTION: MATTHEW R. PARK

PHONE: (403) 343-3320 FAX: (403) 343-6069

FILE NUMBER: 127984/MP

AFFIDAVIT OF Faissal Mouhamad

Sworn on September 8, 2022

- I, FAISSAL MOUHAMAD, of Red Deer County, in the Province of Alberta, Businessman, MAKE OATH AND SAY AS FOLLOWS:
 - 1. I have personal knowledge of the matters hereinafter deposed to, except where stated to be based on information and belief, in which case I verily believe the

same to be true.

2. I am one of the defendants named in this action.

3. Unless otherwise indicated, capitalized terms used in this affidavit shall have the

meanings given to them in the affidavit sworn by Jocelyn Beriault in this action

on August 19, 2022 (the "Beriault Affidavit") and in my affidavit sworn on August

23, 2022 (the "First Faissal Affidavit").

4. McIvor is essentially a holding company. It has no employees and does not carry

on any sort of business. Its only asset is the McIvor Lands.

5. Throughout the KDI Listing, the listing price for the McIvor Lands was

\$6,000,000.00.

6. The Altalaj Offer was the only offer made to purchase the McIvor Lands during

the KDI Listing.

7. I swear this affidavit in response to RBC's receivership application.

SWORN before me at the City of Red Deer)

in the Province of Alberta, this 3 day

of September, 2022

FAISSAL MOUHAMAD

A Commissioner for Oaths in and for

Alberta

Matthew R. Park

Barrister and Solicitor A Commissioner for Oaths

in and for Alberta