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JUDICIAL CENTRE **EDMONTON**

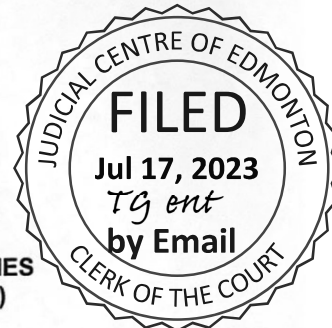
PLAINTIFF **MOSKOWITZ CAPITAL MORTGAGE FUND II INC.**

DEFENDANT **1631807 ALBERTA LTD., RADIANT TECHNOLOGIES INC., and RADIANT TECHNOLOGIES (CANNABIS) INC.**

DOCUMENT **AFFIDAVIT**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT DLA Piper (Canada) LLP
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File No.: 013875-00002

Clerk's stamp:



THIRD AFFIDAVIT OF BRIAN MOSKOWITZ

Sworn on July 10, 2023

I, Brian Moskowitz, of the City of Toronto, in the Province of Ontario, SWEAR AND SAY THAT:

1. I am the President of the Plaintiff, Moskowitz Capital Mortgage Fund II Inc. ("**MCMF**"), and as such, I have a personal knowledge of the facts and matters hereinafter deposed to except where stated to be on the basis of information and belief, and, where so stated, I verily believe the same to be true.
2. I previously filed an Affidavit of Default, dated December 12, 2022, (the "**First Moskowitz Affidavit**") and an Affidavit dated March 12, 2023, (the "**Second Moskowitz Affidavit**") in this action. In this Affidavit, unless otherwise stated, I adopt capitalized naming conventions established in both the First Moskowitz Affidavit and Second Moskowitz Affidavit.
3. This Affidavit is filed by MCMF in support of its Application seeking to extend the scope of MNP Ltd.'s (the "**Receiver**") appointment to deal with certain chattel property assets of the Debtors in these proceedings.
4. As is detailed in the First Moskowitz Affidavit and the Second Moskowitz Affidavit, MCMF is a secured lender to the Debtors who defaulted on financial obligations owing to MCMF in 2022. MCMF commenced these proceedings seeking to enforce its security against the Debtors' Lands. In early 2023, MCMF determined that sales proceeds from the forced sale of the Lands would likely be insufficient to retire the Indebtedness owing to MCMF. Accordingly, MCMF obtained a Limited Receivership Order from this Honourable Court on March 21, 2023, pursuant to which the Receiver was empowered to deal with certain of the Debtors' equipment.
5. A portion of the Debtors' equipment subject to the security of MCMF was deliberately excluded from the scope of the Limited Receivership Order so as to enable the Debtors to attempt to continue

to carry on business during the pendency of real and personal property sales processes facilitated through these proceedings.

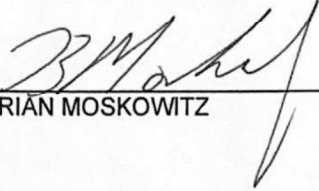
6. On May 30, 2023, the Receiver obtained a Sale Approval and Vesting Order permitting the Receiver to sell the equipment of the Debtors included in the scope of the Limited Receivership Order by auction.
7. The sales processes for both the Debtors' Lands and the Debtors' equipment included in the Limited Receivership Order have not yet concluded.
8. I have remained in contact with Dr. Steven Splinter ("**Splinter**"), the Chief Executive Officer of Radiant Technologies, subsequent to the granting of the Limited Receivership Order.
9. On or about June 15, 2023, Splinter verbally advised me, and I verily believe it to be true, that the Debtors have laid off all but one of their employees.
10. On or about June 15, 2023, Splinter further advised me that electrical and water utilities to one of the Debtors' two facilities sited on the Lands would shortly be discontinued due to non-payment. For clarification, the Debtors had long since discontinued payment of utility accounts at the other of the Debtors' two facilities, thus causing MCMF to take over payment of those accounts.
11. On or about June 30, 2023, Splinter verbally advised me, and I verily believe it to be true, that the Debtors' only remaining employee is in the process of destroying the remaining inventory of the Debtors' cannabis products.
12. Beginning on July 4, 2023, MCMF began directly making payments to the Debtors' remaining utility providers' accounts to prevent the discontinuance of water and electrical utilities.
13. On or about July 8, 2023, Splinter verbally advised me, and I verily believe it to be true, that the Debtors have been unsuccessful in obtaining additional financing, despite efforts to do the same.
14. In light of the above, MCMF seeks to enable the Receiver to sell the remaining equipment of the Debtors that had been excluded from the scope of the Limited Receivership Order.
15. A schedule containing what MCMF understands to be the remaining equipment of the Debtors is attached as **Exhibit "A"** to this Affidavit. This schedule was generated by MCMF by isolating assets identified in an equipment list previously provided to MCMF by the Debtors that had been excluded by MCMF when it generated the schedule set out in Exhibit "L" to the Second Moskowitz Affidavit.

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16. I make this Affidavit in support of an Application by MCMF to amend the Limited Receivership Order in these proceedings and for no other or improper purpose.

SWORN BEFORE ME at City of Toronto, in the)
Province of Ontario, on the 10th, day of July,)
2023.)

K. Robinson)
A Notary Public in and for the Province of)
Ontario)



BRIAN MOSKOWITZ



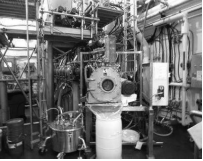






KRISTIN MELISSA ROBINSON,
Notary Public, Province of Ontario,
limited to the attestation of instruments
and the taking of affidavits,
for Moskowitz Capital Management Inc.,
and its associated companies.
Expires July 13, 2025.

This is **Exhibit A** referred to in the Affidavit of BRIAN MOSKOWITZ, sworn before me on this 10th day of July, 2023.

K. Robinson

A Notary Public in and for the Province of Ontario










KRISTIN MELISSA ROBINSON,
Notary Public, Province of Ontario,
limited to the attestation of instruments
and the taking of affidavits,
for Moskowitz Capital Management Inc.,
and its associated companies.
Expires July 13, 2025.

ITEM	PHOTO	Pic Ref	UNIT	DESCRIPTION	VIN/SN
1		P1140562-566	FRK2	HYSTER 40 FORKLIFT W/ 42" FORKS & 38.5" TDL INTEGRE, MODEL J40XN	A935N01688K
2		P1140571-573		1992 300 GALLON SS VENT TANK	93PH46309
3		P1140605-606		TEMA CENTRIFUGE H250 SS EXPLOSION RATED	
4		P1140612-613		TEMA SOLID BOWL CENTRIFUGE DECANter, 4300 RPM, XP RATED	000698
5		P1140630		EXPLOSION PROOF VACUUM	
6		P1140641-643		AS26 SHARPLE CENTRIFUGE SS	90AS26SP-87
7		P1140679-680		TEMA CENTRIFUGE, MODEL# SBD320, XP RATED	
8		P1140682-683		TEMA CONTURBEX CENTRIFUGE, MODEL H400K, XP RATED	001284
9		P1140708-709		AIR HANDLING UNIT 2	47993 AHU-2
10		P1140722-723		AIR HANDLING UNIT 3	
11	NO PHOTO AVAILABLE			AIR HANDLING UNIT 1	

12		P1140734-735		RO WATER PURIFICATION SYSTEM	
13		P1140744-745		KAESER ASD 40 SIGMA, ROTARY AIR COMPRESSOR SYSTEM	
14		P1140767-768	FUH2	FUMEHOOD	
15		P1140770-771	QC-HPLC2	AGILENT	
16		P1140781		COMPUTERS, MONITORS, MISC LAB ITEMS	
17		P1140783-784	QC-PHEC1	METTLER TOLEDO TOC INSTRUMENT	
18		P1140789-790	QC-AW1	AQUALAB 4TE WATER ACTIVITY METER	
19		P1140792-793	QC-LC1	HEATING PLATE	
20		P1140806-809		SERVER FOR SECURITY SYSTEM W/ APPROX 100 CAMERAS	
21		P1140815-841	SPD01	S01 ZIERER SHORT PATH DISTILLATION PLANT	
22		P1140846	PS2	OHAUS DEFENDER 5000 XTREMEW SCALE	

23		P1140851		THERMO HOT PLATE	
24		P1140851	BAL2	SCALE	
25		P1140853	BAL4	OHAUS BALANCE 4	
26		P1140855		MISC CARTS & DRUMS	
27		P1140856		MISC TANKS & CARTS	
28		P1140857		MISC CABINETS & ITEMS	
29		P1140858		ETHANOL FIRE SUPPRESSION	
30		P1140859		MISC RACKING & METAL CABINET	
31		P1140860		PART OF OVERALL INSTRUMENT LIST	
32		P1140861		VARIOUS SANITARY HOSES & STORAGE CABINETS	
33		P1140862-863		WASH STATION	COST

34		P1140870		TOOL CHEST & MISC SHOP ITEMS	
35		P1140871		MISC RACKING & SUPPLIES	
36		P1140872		MISC OPERATING SUPPLIES	
37		P1140874		MISC CARTS	
38		P1140875		MISC SMALL CARTS & CABINETS	
39		P1140876		MISC SMALL CARTS & CABINETS	
40		P1140877		METAL SHELVING & (22) COLLAPSIBLE BINS, FENCING	
41		P1140878		METAL SHELVING OF DRUMS & SUPPLIES	
52		P1140879-880		MISC CARTS & NEW PUMPS (STILL IN CASES), MULTIPLE 1000L ETHENOL TOTES	
43		P1140881-883	PW1	KARCHER PRESSURE WASHER	
44		P1140886		CART & MISC ITEMS	

45		P1140887		VARIOUS BROOMS & SQUEEGEES	
46		P1140888-890	JVFS1	JOHNNY VAC COMMERCIAL FLOOR CLEANER	
47		P1140891-892		(3) COMMERCIAL WASH BUCKETS & MOPS, METAL RACKING W/ VARIOUS ITEMS	
48		P1140884	DS2	FAIRBANK TRANSPORT SCALE	
49		P1150071-074		(2) TEMA CENTRIFUGE, MODEL# SBD320, XP RATED	
50		P1150135-136		NAPCO E SERIES VACUUM OVEN, MODEL # 5861	
51		P1150180-186 & P1150257-260 & P1150262-267 & P1150269-271		MASS SPECTROMETER - THERMO ULTIMATE 3000, DIONEX ULTIMATE 3000 PUMP, DIONEX ULTIMATE 3000 AUTOSAMPLER, DIONEX ULTIMATE 3000 COLUMN COMPARTMENT, DIONEX ULTIMATE 3000 DIODE ARRAY DETECTOR, THERMO SCIENTIFIC Q EXACTIVE FOCUS, VANQUISH COLUMN COMPARTMENT, VANQUISH DETECTOR, AUTOSAMPLER, PUMP, PEAK SCIENTIFIC	
52		P1150188-189		BUCHI PURE C-850 FLASH PREP	
53		P1150293-295		WATER STILL AQUATRON A4000D	