### BANKRUPTCY AND INSOLVENCY ACT

#### **Form 87**

### **Notice and Statement of the Receiver**

(Subsections 245(1) and 246(1) of the Act)

## IN THE MATTER OF THE RECEIVERSHIP OF THE PROPERTY OF IFLYVANCOUVER INC.

### The Receiver gives notice and declares that:

1. On the 19<sup>th</sup> day of May 2023, the undersigned, KPMG Inc., became the receiver and manager (the "**Receiver**") in respect of the property of iFlyVancouver Inc. (the "**Company**") (the "**Property**").

The Property of the Company can be summarized as follows<sup>1</sup>:

| Assets                            | Estimated Amount (CAD \$) |
|-----------------------------------|---------------------------|
| Guaranteed Investment Certificate | 1,100,000                 |
| Refundable Deposits               | 592,449                   |
| Plant and Equipment               | 17,353,488                |
| Franchise Agreement               | 100,763                   |
| Total                             | 19,146,700                |

- 2. The undersigned became the Receiver in respect of the assets, undertakings and properties described above by virtue of being appointed by the Supreme Court of British Columbia File No. H-220275, Vancouver Judicial Centre, dated May 19th, 2023.
- 3. The undersigned took possession or control of the property described above on the 24<sup>th</sup> day of May, 2023.
- 4. The following information relates to the Receivership:

(a) Address of insolvent persons: 9151 Van Horne Way, Richmond

Vancouver, BC, V6X 1W3

(b) Principal line of business: Sports activities

(c) Location of business: 9151 Van Horne Way, Richmond

Vancouver, BC, V6X 1W3

<sup>&</sup>lt;sup>1</sup> The above summary of estimated assets has been prepared without sight of the books and records of the Company and may not accurately reflect the net realizable value of the Company's assets.

### *Notice and Statement of the Receiver (Subsections 245(1) and 246(1))*

(d) Estimated amount owed by the Company to each creditor who holds security on the property described above<sup>2</sup>:

| Secured Creditors       | Estimated Amount (CAD \$) |
|-------------------------|---------------------------|
| Royal Bank of Canada    | 10,500,000                |
| Canadian Revenue Agency | 300,000                   |
| Total                   | 10,800,000                |

- (e) The list of other creditors of the insolvent persons and the amount owed to each creditor (to the extent that it is known) and the total amount due by the insolvent persons is attached to this notice as **Appendix "A"**.
- (f) The intended plan of action of the Receiver during the receivership, to the extent that such a plan has been determined, is to preserve the property and eventually realize on that property, subject to various considerations.
- (g) Contact Person for Receiver:

Michelle Regan Joe Sitholé KPMG Inc. KPMG Inc.

777 Dunsmuir Street Suite 3100, 205-5<sup>th</sup> Avenue SW

 Vancouver, BC, V7Y 1K3
 Calgary, AB, T2P 4B9

 Telephone: (778) 370 3436
 Telephone: (403) 691-8070

 Facsimile: (403) 691-8008
 Facsimile: (403) 691-8008

 Email: michelleregan@kpmg.ca
 Email: jsithole@kpmg.ca

Dated at Vancouver, British Columbia, this 25th day of May 2023.

**KPMG Inc.,** in its capacity as receiver and manager of iFlyVancouver Inc. and not in its personal or corporate capacity

Per: Huey Lee

Senior Vice President

<sup>&</sup>lt;sup>2</sup>Amounts owing are based on estimates provided and may not accurately reflect the liabilities of the Company.

# APPENDIX "A" LIST OF UNSECURED CREDITORS

| Creditor Name                | Amount Owing (CAD \$) |
|------------------------------|-----------------------|
| Hexcel Construction Ltd      | 89,000                |
| MBA Asset Management Inc     | 550,000               |
| Total Site Service Inc       | 5,400                 |
| Pacific Industrial Movers LP | 182,616               |
| Total Unsecured Creditors    | 827,016               |