

RELEASE

KNOW ALL PERSONS BY THESE PRESENTS that in accordance with an Order of the Court dated _____, attached hereto as Schedule “A”, Ernst & Young Inc. in its capacity as receiver and receiver manager of Silver Hill Fur Farm Ltd. (the “**Receiver**”) having been appointed by Order of the Supreme Court of Prince Edward Island dated March 29, 2017, (in consideration of \$162,000.00 DOLLARS, the receipt whereof is hereby acknowledged), on behalf of the estate of Silver Hill Fur Farm Ltd. (the “**Estate**”) does hereby remise, release and forever discharge Rose Gavin, Leigh Gavin, James Gavin, Gavco Fishing Enterprises Ltd. and Bullwinkle Fisheries Ltd. (collectively the “**Releasees**”) their heirs, successors and or assigns (as the case may be), of and from all manner of actions, causes of action, suits, debts, dues, accounts, bonds, covenants, contracts, claims and demands whatsoever which against the said Releasees, the Estate ever had, now has or which its successors and or assigns, or any of them, hereafter can, shall or may have for or by reason of any cause, matter or thing arising from the claims identified by the Receiver against and/or involving the Releasees as set out in its reports filed in matters addressed in the Cause #S1-GS-27628 in the Prince Edward Island Supreme Court (collectively, the “**Claims**”). Furthermore, the Estate agrees not to knowingly make or assert any Claims against or on behalf of any person who might claim subrogation, contribution or indemnity against the Releasees under the provisions of any statute or otherwise provided nothing herein shall operate as a bar to any Claims being asserted against Casey Gavin or any member of Casey Gavin’s family other than the Releasees or any person, entity, partnership or association in which Casey Gavin has an interest or with whom Casey Gavin does or has done business with directly or indirectly including through the Estate other than the Releasees (collectively, the “**Non Released Parties**”).

The Releasees shall not assign, transfer or otherwise cause the releases granted herein to be conveyed or available to any Non Released Parties and, without limiting the generality of the foregoing, if any Releasee amalgamates or otherwise combines its operations in or with any Non

Released Party(ies) then such new amalgamated or combined entity shall not benefit from the releases granted herein.

The payment herein does not constitute an admission of liability on the part of the Releasees.

This release is executed by the Estate on the ____ day of _____, 2017.

**SIGNED, SEALED AND
DELIVERED** in the presence of:

THE ESTATE OF SIVER HILL FUR
FARM INC.

Witness

Per: George Kinsman of Ernst &
Young Inc. as the Court Appointed
Receiver of the Estate of Silver Hill
Fur Farm Inc. and not in its personal
capacity