

This is the 1st Affidavit of Benoit Mourot
in this case and was made on January 4, 2021.

No. S-208894
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C., 1985
c. C-36, AS AMENDED

-AND-

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF
URTHECAST CORP, URTHECAST INTERNATIONAL CORP., URTHECAST USA INC.,
1185729 B.C. LTD. AND THOSE OTHER PETITIONERS SET OUT ON THE ATTACHED
SCHEDULE "A"

PETITIONERS

AFFIDAVIT OF BENOIT MOUROT
(Sworn January 4, 2021)

I, **BENOIT MOUROT**, of the City of Minneapolis, in the State of Minnesota, in the
United States of America, MAKE OATH AND SAY:

1. I am an IT Director, responsible for product management at Land O'Lakes, Inc. I have
knowledge of the following matters, except where I indicate that statements are based upon
information provided by others, in which case I verily believe the information to be true. Unless
the context requires identifying the specific corporate entity, I will use "Land O'Lakes" and
"Urthecast" when describing our respective businesses generally.

2. I am one of Winfield's representatives on the Joint Development Committee (JDC) that
was established by the Interim License and Services Agreement. I have been on the committee

since it was formed in 2019. In total, there have been 7 meetings of the JDC and the minutes of those meetings and accompanying meeting materials are attached as follows:

- i. April 10, 2019 meeting minutes and presentation are attached as **Exhibit "A"**;
- ii. July 15, 2019 meeting minutes and presentation are attached as **Exhibit "B"**;
- iii. October 11, 2019 meeting minutes and presentation are attached as **Exhibit "C"**;
- iv. January 22, 2020 meeting minutes and presentation are attached as **Exhibit "D"**
- v. April 23, 2020 meeting minutes and presentation are attached as **Exhibit "E"**
- vi. July 21, 2020 meeting minutes and presentation are attached as **Exhibit "F"**; and
- vii. October 1, 2020 meeting minutes and presentation are attached as **Exhibit "G"**.

3. The JDC dealt with a number of issues including the UrtheDaily's timeline for launch and specifications for its imagery products. The timeline for the launch of the UrtheDaily was a core issue dealt with by the JDC and it was discussed at every meeting. The committee members worked collaboratively together and the meeting minutes accurately reflect the matters discussed and unanimous decisions for the actions that the JDC was supervising.

4. At the first meeting, the JDC reviewed and discussed a number of topics that are described in the minutes from that meeting. This included the expected timeline for the launch of the UrtheDaily in 2021 put forward by Urthecast. No decisions were taken other than to review a list of action items at the second JDC meeting.

5. The minutes from JDC meetings reflect that in regards to the launch of the UrtheDaily the decision of the JDC was that *"Mission timeline to be maintained: pilot in 2022Q4 is mandatory to fully validate the UD Imagery service and allow a full-scale campaign in 2023"*. "UD" is short form for the UrtheDaily and this is referring to a pilot program in the fourth quarter of 2022

followed by full scale commercial operations in 2023. To achieve this, UrtheDaily would be launched in the fourth quarter of 2021. The decision taken by the JDC is shown under the "Summary" heading of the minutes (Exhibit "D") and this is set out below for ease of reference:

Joint Development Committee Minutes

To: Joint Development Committee
From: Vincent Lelandaïs
Date: 1/22/2020
Re: Meeting Minutes

Joint Development Committee took place on October 11th; the following points have been reviewed and discussed:

- Status on action from previous meeting
- UrtheDaily mission update
- Geosys Program portfolio
 - R7 update
 - Platform separation status
 - UrtheDaily preparation status
- Geosys/UrtheCast roadmap early review of new products
- In-Season service delivery performance review

Summary:

Below is the status of actions identified during JDC3:

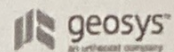
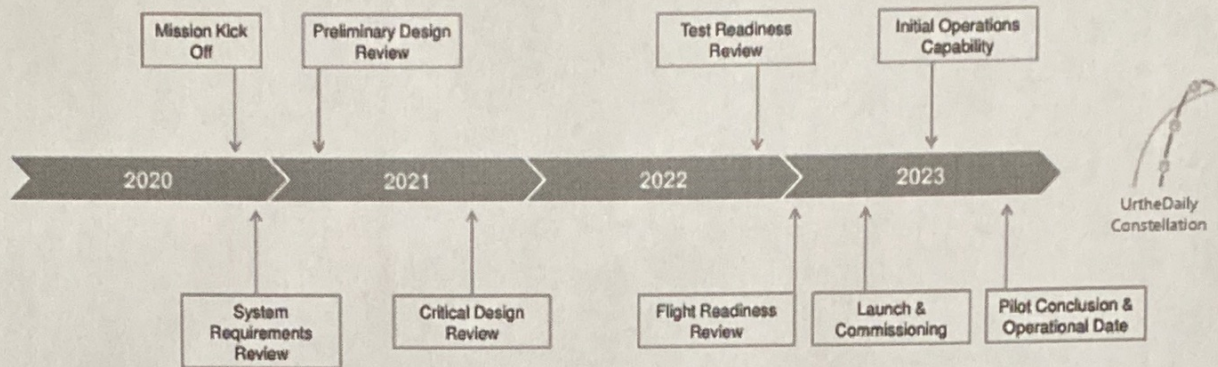
Actions	Owner	Status
Confirm data access condition as Deimos is on sale.	Geosys	In progress
Need to finalize Program Executive Summary template for next JDC	Geosys	In progress
JDC deck content on UD Update: • Need to have up to date slide on mission specs (number of satellites, daily acquisition...) • Mission timeline to be maintained: pilot in 2022Q4 is mandatory to fully validate the UD Imagery service and allow a full-scale campaign in 2023	Geosys	Completed
Slides to be added on SLA section to review Virtual constellation update for the interim period.		
On slide 65 – 66, soil depth analyzed by radar is 5-6 cm	Geosys	Completed



6. Urthecast's representatives on the JDC put forward revisions to the proposed timeline for the launch of the UrtheDaily. At the last two JDC meetings on July 21 and October 1, 2020, Urthecast presented changes to the launch dates for the UrtheDaily to 2023. The most recent timeline proposed at the final JDC meeting (Exhibit "G") is set out below for ease of reference:

UrtheDaily Mission - Timeline

UrtheDaily is projected to be launched early 2023 and begin commercial operation mid 2023



7. There was no decision reached by the JDC in regards to this extension of the timeline. This is reflected in the minutes from those meetings.

8. This Affidavit is sworn in response to the application returnable on January 6, 2021, and for no other or improper purpose.

SWORN BEFORE ME by video conference via Zoom, with the affiant being located in the City of Minneapolis in the State of Minnesota and the commissioner being located in the City of Toronto, in the Province of Ontario this January 4, 2021.

Brendan O'Grady (LSO# 66419D)
Commissioner for Taking Affidavits (or as may be)

Benoit Mourot