Court File No. CV-24-00722386-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

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 OR ARRANGEMENT OF ATLAS GLOBAL BRANDS INC., GREENSEAL CANNABIS COMPANY, LTD., GREENSEAL NURSERY, LTD., AGMEDICA BIOSCIENCE INC., WELLWORTH HEALTH CORP., 5047346 ONTARIO INC., 8050678 CANADA INC. AND TAVIVAT NATURALS INC.

Applicants

AFFIDAVIT OF JASON CERVI
(Affirmed July 26, 2024)

I, Jason Cervi, of the City of Burlington, in the Province of Ontario, AFFIRM:

INTRODUCTION AND OVERVIEW

1. I am the Chief Financial Officer ("**CFO**") of Atlas Global Brands Inc. ("**Atlas**", together with its Ontario Subsidiaries (as defined below), the "**Applicants**" or the "**Atlas Ontario Group**").

2. GreenSeal Cannabis Company, Ltd. ("**GreenSeal**"), GreenSeal Nursery, Ltd. ("**GreenSeal Nursery**"), AgMedica Bioscience Inc. ("**AgMedica**"), Wellworth Health Corp. ("**Wellworth**"), 5047346 Ontario Inc. ("**5047 Ontario**"), 8050678 Canada Inc. ("**8050 Canada**") and Tavivat Naturals Inc. ("**Tavivat**") are subsidiaries of Atlas (together, the "**Ontario Subsidiaries**"; the Applicants, together with all Atlas subsidiaries, is the "**Atlas Group**").

3. I have been the CFO of Atlas since January 31, 2023. I joined Atlas on December 30, 2022, as Global Head of Finance and Administration and Group Controller. I was appointed as Director

of GreenSeal and GreenSeal Nursery on April 28, 2023 and Director of AgMedica on May 31, 2023. I have personal knowledge of the matters to which I depose in this Affidavit except where I have obtained information from others. Where I have obtained information from others, I have stated the source of my information and believe such information to be true.

4. Capitalized terms used herein and not otherwise defined have the meaning ascribed to them in my affidavit affirmed on June 19, 2024 (the "**Initial Cervi Affidavit**"). All references to monetary amounts in this affidavit are in Canadian dollars unless otherwise noted.

5. This affidavit is affirmed in support of a motion for a Sale and Investment Solicitation Process Approval Order (the "**SISP Approval Order**") pursuant to the CCAA.

6. At stake in the SISP Approval Order is whether the Court will approve the implementation of a sale and investment solicitation process to solicit interest in and opportunities for a sale, or investment in, all or part of the Applicants' Property and/or the Business.

7. At stake in the SISP Approval Order is also a dispute with respect to the rights and powers that Stoke Canada Finance Corp. ("**Stoke**") is seeking to include in the SISP process that would unduly prejudice the other, more senior, secured creditors who carry significantly larger positions as well as potentially negatively impugn the value for potential bidders on the GreenSeal operations.

8. Counsel for the Applicants served a Motion Record in support of the SISP Approval Order at 1:05 p.m., on Thursday, July 25, 2026. At 3:46 p.m., Stoke advised that it would not accept the proposed SISP. At 6:00 p.m., without prior notice, Stoke served almost 100 pages of material, including two new affidavits in support of its request in respect of the SISP. These affidavits are

the Affidavit of Howard Steinberg affirmed July 25, 2024 ("**Second Steinberg Affidavit**") and the Affidavit of David Goldstein affirmed July 25, 2024 ("**Second Goldstein Affidavit**").

9. The Second Steinberg Affidavit provides an assessment of a purported material change in the financial situation of GreenSeal. The affidavit has not been subjected to cross-examination and contain significant factual errors, as is outlined below.

APPLICANTS' RESPONSE TO THE STEINBERG AFFIDAVIT

A. Clarification of the Reported Events Since the Granting of the Tario

10. The Second Steinberg Affidavit at paragraph 14 with respect to the proposed monitoring of the Stoke Receivable Charge assert that "breaches of these covenants in the TARIO would not be discovered until after the funds were dissipated."

11. At paragraph 15, Mr. Steinberg suggests that the Stoke proposed structure "was more efficient and better protected Stoke's interests while permitting its receivables to be used for working capital".

12. The Stoke proposed structure was flawed as it focused entirely on GS A/R, not allowing for consideration of cash received in account that could have created the appearance of a default despite the funds not actually being used. The Applicants, in the spirit of a being collaborative, proposed a revision to the Stoke proposal whereby the cash balance along with the GS A/R would form the collateral base for the Stoke charge. This was a more effective solution to which all parties have since agreed.

13. Building on this new structure and prior to any further disbursement of funds in support of GreenSeal's operations, management worked with the Monitor to ensure adequate controls were implemented in the review and approval process that would ensure no breaches would be

permitted. A simple tracker was developed to reflect Cash and Accounts Receivable balances on hand, the proposed disbursements provided to the Monitor for approval and a comparison of the net resulting position to the Stoke Charge (the "**Collateral Tracker**"). An example of the Collateral Tracker is attached in **Exhibit "A"**. A copy was provided to Stoke's counsel shortly after the review and approval of the Monitor.

14. Mr. Steinberg does not describe or acknowledge our efforts to remedy the flaws in Stoke's proposal so that it could work, although he admits in paragraph 16 that "Stoke was satisfied with its proposed structure as it did not require Stoke to be dependent on real time reporting by GreenSeal".

15. Mr. Steinberg states in paragraph 19 that "it is not clear whether the Stoke Receivables are currently being used". This statement is false. I am informed by Mary Paterson, counsel to the Applicants, that she provided the Collateral Tracker to Stoke's counsel shortly after it was approved by the Monitor on June 23, 2024 prior to any funds actually being dispersed. Further, the Collateral Tracker was included as part of the weekly reporting package as per the cadence established with the Information Liaison, on June 24, 2024. This reporting package was also subject of discussion in a recurring meeting established between management, the Information Liaison, and David Goldstein (the "**Information Liaison Meeting**") held on June 25, 2024 at 3:00 p.m. EST in which the Collateral Tracker was specifically discussed. The Collateral Tracker (Exhibit A) states "Stoke Receipts used in operations" are $124,370.11. It also indicates that there is a $678,852 Surplus of collateral over the $1.175 million Stoke Charge, leaving no cause for any concern over the security interest.

16. Paragraph 20 of the Second Steinberg Affidavit implies that there is uncertainty in the conduct of operations of GreenSeal, implying a lack of transparency and by asserting that the

remittance of the Stoke Advance Payment is the factor "suggesting that working capital expenditures continue to be paid".

17. The weekly reporting package provided to the Information Liaison includes an itemized list of all vendor payments made. There is no uncertainty in the fact that the business continues to operate. Management, under the supervision of and with the assistance of the Monitor, has been transparent with the Information Liaison throughout the process.

B. Alleged Material Deterioration of GreenSeal's Accounts Receivable

18. On July 9, 2024, the Ontario Cannabis Store ("**OCS**") announced that it was implementing a change to its payment terms for Flowthrough products, reducing the payment cycle from 60 days to 15 days. GreenSeal has within its portfolio of listings with the province a number of these Flowthrough products. The accelerated timing of the cash conversion cycle has been reflected in the Cash Flow Forecast provided to the Information Liaison and referenced in the Second Steinberg Affidavit.

19. This change will impact the balances held in GS A/R because GS A/R will be converted to cash more quickly. Accelerated cash conversion should be view as a significant improvement for the overall business as cash is realized sooner than previously anticipated in the June 5, 2024 Cash Forecast also referenced in the Second Steinberg Affidavit.

20. At paragraph 21, Mr. Steinberg states that "GS A/R and cash on hand, have deteriorated significantly since the last hearing". This statement is misleading as it does not fairly present the facts at hand, namely:

(a) As at the conclusion of the prior week, GreenSeal had a $465,230 favourable net change of cash position, reflecting the efforts of management to ensure the most efficient collection and use of funds to the benefit of all stakeholders of the business. This fact is shared not only in the weekly reporting package to the Information Liaison; it is also included in the Monitor's report.

(b) The actual balance of the cash on hand and GS A/R supporting the Stoke Charge of $1,229,236 was $2,158,973 as of the opening of the week of July 22, 2024 and is expected to close the week at $1,908,088 based on the completion of the disbursements as approved by the Monitor. There is no current risk to Stoke's security interest.

21. Mr. Steinberg further states at paragraph 23 that the "projections are material and disproportionately impact Stoke".

22. Management continues to take a conservative view of the forecasted periods to ensure there is adequate sensitivity to changing economic conditions. The acceleration of the OCS payment schedule is a known fact and therefore management endeavoured to reflect such in the forecast in terms of the impact to the timing of cash and on the GS A/R balances. Management did not yet reflect the likely resulting upside to the cash forecast of advancing the collection of future revenues by the 45-day improvement in payment cycle. Said differently, management held the forecast to the aggregate value of total receipts over the period despite the likely probability that sales that previously fell outside of the projected Cash Flow period would now materialize within the period.

23. Had management decided to include the likely upside in Cash Flow noted above, it is highly probable that such a position would have been met with significant challenge from Stoke. Ultimately, management has worked diligently with the Monitor in building the forecasts to ensure that there is a high degree of confidence in our ability to achieve these results and it continues to be the most prudent course to view the projections with the utmost conservatism.

24. Mr. Steinberg states in Paragraph 28 that “the total collateral package [combined GS A/R and Cash on Hand] is materially diminished”.

25. Included in the weekly reporting package to the Information Liaison is an analysis of the projected collateral against the Stoke Charge, attached as **Exhibit “B”**. Mr. Steinberg’s statement again is misleading. Despite the adjustment in the projected GS A/R balances noted and the continued conservativism embedded in the forecasts, the collateral base in the projected periods continue to provide sufficient security to the Stoke Charge through to the conclusion of the proposed SISP process on September 26, 2024. This information was also highlighted during the Information Liaison Meeting.

26. During the Information Liaison Meeting and as noted at paragraph 25 of the Second Steinberg Affidavit, management became aware of RTVs of an approximate value of $99,000. In our continued efforts to ensure complete transparency, this information was shared immediately that same day. The discussion included not only the disclosure of the issues at hand, but also the mitigation strategy. Ontario is a highly competitive and saturated marketplace, however there are opportunities to repurpose any resulting slow moving inventory returned through the RTV process and liquidate it in a less competitive market. The Information Liaison indicated that these occurrences are fairly common in the industry and fully supported management’s strategy.

27. Addressing the concern raised at paragraph 26 regarding the impact of the RTV not being reflected in the forecasted figures, as indicated on numerous occasions and corroborated by the Monitor, the forecast is maintained to be a conservative view. Events such as this RTV are precisely why conservatism is most prudent in forecasting as it provides for flexibility to deal with these situations as they occur without significant fear of materially impacting the Cash Forecasts.

C. Information Liaison's role

28. The Applicants continue to operate in good faith and with complete transparency in support of the Information Liaison's role in this process. Management has provided weekly reports that are of sufficient detail to review the progress of the business activities and maintains the utmost transparency with respect to information as it becomes know and poses potential risk to Stoke's collateral position.

29. Management has established a weekly Information Liaison Meeting to ensure any and all questions or concerns can be raised and are addressed immediately. David Goldstein utilizes an AI tool in these calls to transcribe notes of the meeting. A copy of the transcript report summary from the meeting held June 25, 2024 is attached in **Exhibit "C"**.

30. As previously noted, the RTV issue was immediately raised by management and a transparent discussion was held. The mitigation strategy described previously was presented by management. The Information Liaison did not provide any additional insights or strategies and agreed with management's approach.

31. The Information Liaison asked various clarifying questions regarding the forecast, all of which were responded to with detail. There was no concern raised that was unanswered during the call.

32. The Information Liaison seemed to be particularly focused on understanding the nature of funding for the retail data programs that support the commercial operations of the Atlas Ontario Group. GreenSeal is a beneficiary of these programs, however the overall cost and management of them are held by the parent company. The Information Liaison seemed to take issue with GreenSeal not directly funding these programs. It was explained that at the time of the GreenSeal acquisition, management consolidated overlapping spending in order to drive synergistic cost

savings leveraging scale and reducing redundancies. These programs have benefit to the other operating businesses of Atlas. Although the AgMedica business has little focus on domestic sales, it should be noted that at the time of the GreenSeal acquisition and the consolidation of these programs, Atlas also had another division in Alberta with significant domestic revenues. Managing these programs at the parent company provides a net benefit to the GreenSeal operations and to their stakeholders. It is unclear what strategic value moving these distinctly under GreenSeal would yield.

33. The Collateral Tracking mechanism and the projected collateral provided in Exhibit A and B respectively were discussed. It was made clear to the Information Liaison that management, in cooperation with the Monitor, has implemented processes and reports to address the specific concerns that Stoke may have. All information presented indicates that there is no currently identified or expected breaches of the covenants of the proposed TARIO occurring prior to the conclusion of the proposed SISP process.

34. The Information Liaison and David Goldstein had every opportunity to have an open dialogue with respect to the concerns raised in the Second Steinberg Affidavit. Other than the various clarifying questions, there was no mention or indication that they held the view that anything reported represented a material breach. Further, the analysis presented at paragraphs 24, 27 and 28 of the Second Steinberg Affidavit was not presented nor discussed despite likely being readily available to the Information Liaison given the filing of his affidavit occurring within hours of concluding the call.

35. All of the concerns raised in the Second Steinberg Affidavit should have been, in good faith and keeping with the intent of a Liaison role, discussed during the meeting held. These meetings were established for precisely this reason, to address concerns of Stoke through the

process and to keep them informed and provide them with an opportunity to opine on the ongoing strategies of the business to ensure maximum value realization.

36. Even if the concerns raised needed investigation such that they could not have been address during the meeting, then the Monitor is in place to ensure the parties adhere to the terms of the Order and should have been consulted with respect to these matters. Had that occurred, the Monitor could have facilitated the discussions and resolution of the concerns.

37. It is unfortunate that rather than utilizing the opportunity to work collaboratively, Stoke and Mr. Steinberg have decided to present their concerns directly to the Court by way of the Second Steinberg Affidavit. This tactic has: 1) wasted the Court's time in reviewing materials unnecessarily that otherwise two parties, acting reasonably, should have been able to discuss; 2) driven increased costs for the legal support required to produce such materials to the detriment of the estate; and 3) wasted management's time and energy in crafting a formal response on very little notice to the detriment of the value maximization efforts in preparing for the SISP process.

CONCLUSION

38. The Atlas Ontario Group respectfully requests that this Court grant the TARIO and the SISP Approval Order as presented by the Applicants, rejecting the proposals submitted by Stoke. The Atlas Ontario Group also asks this Court to compel Stoke and Mr. Steinberg to serve motion materials within two business days of the end of each month to pass their accounts for any fee that will be imposed upon the GreenSeal estate.

39. I affirm this Affidavit in support of an application for the relief set out above, and for no improper purpose.

AFFIRMED BEFORE ME over videoconference in accordance with the Administering Oath or Declaration Remotely Regulation, O.Reg. 431/20, on July 26, 2024, while I was located in the City of Toronto, in the Province of Ontario and the affiant was located in the City of Burlington, in the Province of Ontario.	
Jennifer Bieman Commissioner for Taking Affidavits	Jason Cervi

Jennifer Colleen Bieman,
a Commissioner, etc., Province of Ontario,
while a Student-at-Law.
Expires May 30, 2027.

This is Exhibit "A" referred to in the Affidavit of JASON CERVI affirmed by JASON CERVI of the City of Burlington, in the Regional Municipality of Halton, before me at the City of Toronto, in the Province of Ontario, on July 26, 2024 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

Jennifer Bieman

Commissioner for Taking Affidavits (or as may be)

JENNIFER BIEMAN

Jennifer Colleen Bieman,
a Commissioner, etc., Province of Ontario,
while a Student-at-Law.
Expires May 30, 2027.

	Cash	A/R	Total	
Current Balance	**798,367**	**1,360,606**	**2,158,973**	
Proposed Payments week of 2024-07-22:				
Vendors	- 97,831			
Payroll	- 108,486			
Payroll contributions	- 44,568			
Net Balance	**547,482**	**1,360,606**	**1,908,088**	**A**
Stoke Purchased Receivables			1,354,539	
Less payments:				
First Installment			- 125,304	
Second Installment				
Third Installment				
Fourth Installment				
Net Charge			**1,229,236**	**B**
Surplus / (Deficit) in collateral over charge			**678,852**	**A-B**

Stoke Receipts	**671,852.09**
Stoke Receipts used in operations	**124,370.11**

This is Exhibit "B" referred to in the Affidavit of JASON CERVI affirmed by JASON CERVI of the City of Burlington, in the Regional Municipality of Halton, before me at the City of Toronto, in the Province of Ontario, on July 26, 2024 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

Jennifer Bieman

Commissioner for Taking Affidavits (or as may be)

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Expires May 30, 2027.

	22-Jul-24	29-Jul-24	05-Aug-24	12-Aug-24	19-Aug-24	26-Aug-24	02-Sep-24	09-Sep-24	16-Sep-24	23-Sep-24	30-Sep-24
GreenSeal											
Opening Accounts Receivable	1,165,851	1,159,742	1,007,241	867,378	830,112	863,222	861,348	775,794	721,679	685,369	649,058
Current AR Collections	- 107,797	- 279,851	- 228,315	- 82,810	- 64,348	- 99,498	- 44,266	- 29,908	-	-	-
New Invoices - Confirmed	101,688	127,350	19,934	40,281	-	-	-	-	-	-	-
New Invoice Collections - Confirmed	-	-	- 39,689	- 102,944	- 64,852	- 64,687	- 17,081	-	-	-	-
New Invoices - New Business			108,207	108,207	162,311	162,311	84,000	84,000	126,000	126,000	84,000
New Invoice Collections - New Business							- 108,207	- 108,207	- 162,311	- 162,311	- 84,000
B2B Invoices		80,000	37,500	37,500	37,500	37,500	37,500	37,500	37,500	37,500	37,500
B2B Collections		- 80,000	- 37,500	- 37,500	- 37,500	- 37,500	- 37,500	- 37,500	- 37,500	- 37,500	- 37,500
Ending Accounts Receivable	**1,159,742**	**1,007,241**	**867,378**	**830,112**	**863,222**	**861,348**	**775,794**	**721,679**	**685,369**	**649,058**	**649,058**
Ending Cash Balance	392,348	416,342	447,593	584,209	523,657	284,459	292,260	456,236	503,794	609,181	12,530
Total Collateral	**1,552,091**	**1,423,583**	**1,314,971**	**1,414,321**	**1,386,878**	**1,145,807**	**1,068,054**	**1,177,915**	**1,189,163**	**1,258,239**	**661,588**
Stoke Charge	1,229,236	1,103,932	1,103,932	1,103,932	1,103,932	978,628	978,628	978,628	978,628	978,628	853,324
Surplus / (Deficit) in collateral over charge	**322,855**	**319,651**	**211,039**	**310,389**	**282,947**	**167,179**	**89,426**	**199,287**	**210,535**	**279,611**	**- 191,736**

This is Exhibit “C” referred to in the Affidavit of JASON CERVI affirmed by JASON CERVI of the City of Burlington, in the Regional Municipality of Halton, before me at the City of Toronto, in the Province of Ontario, on July 26, 2024 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

Jennifer Bieman

Commissioner for Taking Affidavits (or as may be)

JENNIFER BIEMAN

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Expires May 30, 2027.

tl;dv <no-reply@tldv.io>
July 25, 2024 3:52 PM
Jason Cervi
The tl;dv: Stoke/Howard/GreenSeal

Hey jason@atlasglobalbrands.com! 👋

Your meeting recording is ready! 🤩 🤩

Click to view meeting 🚀

Or jump directly to the right moment:

RTV and Inventory Management

Discussion on RTV issues with all-in-one vapes and pre-rolls, inventory levels, and plans to repurpose and resell returned products.

- **General Information:** Discussed RTV issues with all-in-one vapes in Ontario, including hardware problems and plans to replace the units and resell them in Saskatchewan. 02:05

- **General Information:** Provided details on the RTV quantities and values for the all-in-one vapes and pre-rolls, as well as plans to recover some of the costs by reselling in Saskatchewan. 05:28
- **General Information:** Discussed inventory levels, with no significant issues beyond the 90-day mark, and plans to handle the pre-roll inventory by reselling at a discount in Saskatchewan. 07:40

B2B Transactions and Cash Flow Reporting

Clarification on a previous B2B transaction and discussion on how to better track and report RTV-related cash flow impacts.

- **General Information:** Discussed a previous B2B transaction that was incorrectly classified, and the need to ensure proper reporting of such transactions going forward. 14:34
- **General Information:** Suggested adding an RTV line or separate tab in the cash flow model to better track and report the impact of returns on cash flow. 12:19

New Business Forecast

Review of changes in the new business forecast, including a discussion on the rationale behind the increased projections in September.

- **General Information:** Discussed the changes in the new business forecast, including a decrease from 851 to 625 and a subsequent increase in September. 17:49
- **General Information:** Requested clarification on the rationale behind the increased new business projections in September. 18:36

Upcoming B2B Orders

Provided updates on confirmed and potential upcoming B2B orders, including a $80,000 order from Atlantic and other deals for trim and B-grade flower.

- **General Information:** Discussed upcoming B2B orders, including a $80,000 order from Atlantic and other potential deals for trim and B-grade flower. 16:21

Sales Forecast and Receivables

Discussion on sales forecast, receivables, and the impact on cash flow and collateral requirements.

- **Other:** Discussing the impact of reduced new business numbers and the higher end of the back-end cycle. 20:11
- **Other:** Discussing the comfort level with the $600,000 August forecast, considering the $488,000 July dip and management's conservative approach. 21:05
- **Other:** Discussing ongoing commercial discussions and strategies to manage the retail pull-through and mitigate any shortfalls with B2B or international sales. 22:01
- **Other:** Reviewing the August forecast of $747,000 in confirmed orders versus the $601,000 new business projection, and the impact on receivables and cash flow. 23:35

Collateral and Financing Concerns

Discussion on the collateral requirements, potential breach of covenants, and ongoing SISP negotiations.

- **Other:** Discussing the concern over the potential breach of covenants at the end of September 30th and the importance of the SISP negotiations to ensure the company is made whole. **25:28**
- **Other:** Discussing the change in the Terrio security from $853 to $1.175 million and the need to update the collateral packets accordingly. **26:18**
- **Other:** Discussing the concern that a bump in the forecasts could result in less security, and the importance of the SISP process to provide clarity on the final settlement. **27:33**

Intercompany Allocations and Accounting

Discussion on the allocation of corporate expenses and intercompany balances between the parent company and subsidiaries.

- **Other:** Explaining the difference between the contracting entity and where the final cost rests, and the need to consolidate and allocate commercial expenses at the parent company level. **33:33**
- **Other:** Clarifying that post-filing, the parent company Atlas is paying for the data programs that were previously paid by Green Seal, and the need to eventually allocate these costs. **35:24**
- **Other:** Discussing the intercompany receivables and payables that need to be reconciled and settled as part of the SISP valuation exercise, likely as part of the unsecured creditors. **36:43**

Tracking Receivables and Costs

Discussions around providing a summary of data agreements, costs, and tracking receivables and collections to ensure the business is on track.

- **Other:** HS requests a summary of the data agreements and costs that are being paid. Jason confirms they are working on providing this information. **40:29**
- **Other:** Jason reports that they are $240,000 ahead of expected collections, and as long as this trend continues, they should be in good shape. He agrees to continue sharing information to manage risks. **41:47**

Potential Buyers and CCAA Process

Discussions around the CCAA process, potential buyers expressing interest, and the next steps in the sales process.

- **Other:** HS inquires about the status of discussions with potential buyers, whether they are pre- or post-filing, and who might be interested in acquiring Green Seal or its assets. **42:21**
- **Other:** Jason explains that everything is still just talk at this point, but once they start the process next week and get NDAs signed, they will have a better idea of who the interested parties are. **43:29**

- **Other:** Bernie mentions that they hope to skip the formal CCAA vote and get the information flowing, indicating progress in the CCAA process. 44:11

Agmedica Receivable

Discussions around the secured loan to Agmedica and how to properly account for it in the CCAA process.

- **Other:** David inquires about why the secured loan to Agmedica is not included in the list of secured creditors filed with the court. Jason agrees to follow up with the monitor to get it added. 46:28
- **Other:** HS suggests that the Agmedica receivable should be treated as a sale rather than a pre-filing debt, and requests that Jason discuss this with the monitor to ensure it is handled properly. 48:24

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

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APPLICATION OF ATLAS GLOBAL BRANDS INC. UNDER SECTION 46 OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

Applicants

ONTARIO
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AFFIDAVIT OF JASON CERVI
(Affirmed July 26, 2024)

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