

2023 01G 3233
IN THE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR
IN BANKRUPTCY AND INSOLVENCY

IN THE MATTER OF the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3 as Amended (the “**BIA**”)

IN THE MATTER OF the *Companies Creditors Arrangement Act* R.S.C., 1985 c. C-36 as Amended (the “**CCAA**”); and

AND IN THE MATTER OF an application of Big Erics Inc. (“**BEI**”) and Terra Nova Old Port Foods Inc. (“**TNOPFI**”)

AFFIDAVIT

I, Darren D. O’Keefe in the Province of Newfoundland and Labrador, **MAKE OATH AND SAY:**

1. I am the Solicitor for BEI and TNOPFI. Accordingly, I have personal knowledge of the matters set out herein. Where I have relied on information from others, I state the source of such information and verily believe it to be true.
2. Based on my knowledge information and belief, and upon due inquiry with Nicole Myles Brook, President of BEI, the information contained in the within application is true and correct.
3. That Nicole Myles Brook, as President of BEI, has sworn an affidavit in my presence with respect to the content of the within application, the original of which will be delivered to the Court on 22 September 2023.
4. I swear this affidavit in support of the application seeking an extension of the stay of proceedings and for no other or improper purpose.

[Signature page to affidavit of Darren D. O'Keefe, 18 September 2023]

SWORN before me electronically in the City of
St. John's in the Province of Newfoundland
and Labrador, Canada, this 18th of September
2023:



COLIN P. SULLIVAN
Barrister, NL



DARREN D. O'KEEFE