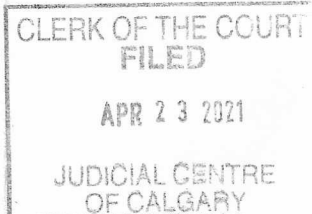


Clerk's Stamp



COURT FILE NO. 1801-04745

COURT Court of Queen's Bench of Alberta

JUDICIAL CENTRE Calgary

PLAINTIFF(S) **HILLSBORO VENTURES INC.**DEFENDANT(S) **CEANA DEVELOPMENT SUNRIDGE INC.
IN THE MATTER OF RECEIVERSHIP OF CEANA DEVELOPMENT
SUNRIDGE INC.**DOCUMENT **Affidavit** of massoud RahnemaADDRESS FOR
SERVICE AND
CONTACT
INFORMATION OF
PARTY FILING THIS
DOCUMENT
Massoud Rahnema
Ph: 403-466-4040**AFFIDAVIT OF****Massoud Rahnema**

Sworn (or Affirmed) on

April. 20, 2021

I, Massoud Rahnema


of Alberta, SWEAR/AFFIRM AND SAY THAT:

1. I am a purchaser of the Unit, as defined below and as such, I have personal knowledge of the facts deposed to herein, except where stated to be upon information and belief, in which case I believe the same to be true.
2. I have sworn a previous affidavit in these proceedings. My first affidavit was sworn on December 21, 2020 (the "Affidavit of Massoud Rahnema") in support of my application for a declaration that the condominium project is subject to a resulting or constructive trust in favor of the Purchasers for payment of the deposit funds which are or should have been held in trust to purchasers.
3. These negotiations resulted in various agreements being signed between the Depositors and Ceana and the Depositor paying to Ceana a total of \$400,000.00. Copies of bank drafts for \$300,000.00 and \$100,000.00 are attached to my affidavit of December 21, 2020.
4. I have failed to have my rights to the balance of purchaser deposits to be recognized in trust or implied trust pursuant to Memorandum of decision of Honourable Madam Justice K. M. Eidsvik passed on 5th day of February 2021.
5. Through the proceeding of this Court Action Number 1801-04745, it has come to my knowledge that the funds were not used for the intended purpose. Evidence is that they were moved out to related parties or used for other purposes.. The facts of funds being moved out of Ceana Development Sunridge Inc. accounts and into related parties is shown in receiver's Third Report (para 43 (sources and uses schedule & appendix "F" dated December 09, 2020))
6. My family has been negatively affected by the misappropriation of funds by Mr. Gaidhar and his family through the Ceana project. There is not a moment that passes, where I am not thinking of the financial loss caused to me. I am constantly thinking of how I will repay the borrowed money, I had used to support the Ceana project. At the current pace, it would take more than my lifetime to overcome these financial losses. Everyone deserves to know the truth behind the missing funds and urge the court to initiate an investigation.
7. Through this affidavit I fully support Mr. Sukhdeep Dhaliwal's application for access to information and request the court order an investigation into Ceana and its management's misconduct.

SWORN (or affirmed) BEFORE ME

on April 20, 2021

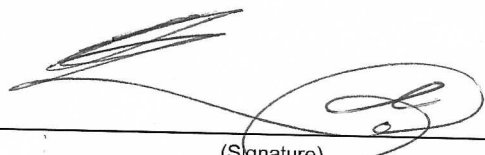
at Calgary, Alberta


(Commissioner for Oaths in and for the Province of Alberta)

TCHUPA CHIBAMBO

Barrister, Solicitor & Notary Public

(Print Name and Expiry of Lawyer/Student-at-Law/
Commissioner or JP)


(Signature)

Massoud Rahnema
(Print Name)