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May 2, 2023

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British Columbia Farm Industry Review Board
PO Box 9129 Stn Prov Govt
Victoria, B.C. V8W 9B5

Attention: Wanda Gorsuch, Manager of Issues and
Planning

To Ms. Gorsuch:

MPL British Columbia Distributors Inc. (MPL) Agency Prior Approval Process – Pre-Hearing Procedural Conference

We write to you with respect to the letter submitted by counsel for MPL dated May 1, 2023 in relation to the 3 day in-person hearing before the BC Farm Industry Review Board (**BCFIRB**) scheduled for May 23, 24, and 26, 2023 (the **Hearing**). In particular, counsel for MPL requests the BCFIRB make two directions in relation to both submitted evidence and witnesses. In response, we suggest the BCFIRB schedule a procedural conference prior to the Hearing to address procedural and evidentiary items prior to the Hearing (the **Procedural Conference**).

In its letter, counsel for MPL requests the BCFIRB to (1) direct Greenhouse Grown Foods Inc. and Windset Farms (Canada) Ltd. to particularize their intended arguments with respect to their Book of Documents submitted April 21, 2023; and (2) direct the parties to advise in advance of the Hearing any witnesses they may call, and provide will say statements for the same. We suggest the BCFIRB make determinations on these issues at the proposed Procedural Conference in consultation with the parties, as well as on the following items:

- a draft schedule for the Hearing including suggested time limits for parties;
- a complete list of each party's witnesses;
- the BCFIRB's preferences regarding the presentation of evidence; and
- clarification on any further procedural items in the BCFIRB's Terms of Reference.

We suggest that the proposed Procedural Conference be scheduled as soon as possible for the

parties to effectively prepare for the Hearing, taking into account the schedules of all parties to attend the same. We look forward to hearing from you with respect to this proposal.

Yours very truly,

LAWSON LUNDELL LLP

A handwritten signature in purple ink, appearing to read 'CAF', is positioned below the firm name.

Craig A.B. Ferris, K.C.*

CAF

cc. Morgan L. Camley, Legal Counsel for MPL British Columbia Distributors Inc.
Client

*Law Corporation