2025 01G 4683
IN THE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR
IN BANKRUPTCY AND INSOLVENCY

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

AND IN THE MATTER OF an application by Ocean View Farms Limited (the "**Applicant**") for relief under s. 11 of the CCAA.

AFFIDAVIT OF DARREN O'KEEFE

I, Darren D. O'Keefe, of St. John's, Newfoundland and Labrador, MAKE OATH AND SAY THAT:

A. Background and Retainer:

1. I am a partner with O'Keefe & Sullivan, counsel for Ocean View Farms Limited ("**OVFL**").

2. O'Keefe & Sullivan was retained by OVFL in February 2025. We have acted as counsel throughout these CCAA proceedings since the Initial Order of 11 September 2025.

B. Breakdown in Solicitor–Client Relationship:

3. There has been a significant and irreparable breakdown in the solicitor–client relationship. As a result, the undersigned is no longer able to obtain reliable instructions or continue to act consistently with my professional obligations.

4. My continued representation of OVFL would be contrary to the *Law Society Code of Conduct* and Rule 23.06(1).

5. To ease the transition our firm has offered that partner Adam G. Baker would assume carriage of the file from OVFL and that offer has not been accepted. OVFL has informed us they do not wish to use our firm for legal services any longer.

C. Outstanding Accounts:

6. OVFL has outstanding unpaid invoices.

7. These invoices have been reviewed by the Monitor and have not been disputed.

8. O'Keefe & Sullivan seeks an order requiring payment within ten (10) days.

D. Need for Transition Period:

9. A ten (10)-day transition period is necessary to avoid prejudice.

10. O'Keefe & Sullivan will remain on the record solely for the purpose of transferring the file.

E. Relief Sought:

11. I swear this Affidavit in support of the Notice of Motion seeking removal as solicitors of record, a direction for OVFL to retain new counsel, a transition period, and a direction to pay outstanding accounts.

DATED at St. John's, Newfoundland and Labrador, this 19 day of November, 2025.

[signature page follows]

SWORN BEFORE ME at the City of St. Johns in the Province of Newfoundland and Labrador this 19th day of November 2025.

A Commissioner for taking Affidavits.
Name:

MELISSA De CARIA
A Commissioner for Oaths in and for
the Province of Newfoundland
and Labrador.
Commission expires December 31, 2028

Darren D. O'Keefe