

SUMMARY OF CURRENT DOCUMENT	
Name of Issuing Party or Person:	John Deere Limited and John Deere Credit Inc.
Date of Document:	7 February 2003
Summary of Order/Relief Sought or Statement of Purpose in Filing:	Reply Memorandum of Fact and Law of John Deere Limited and John Deere Credit Inc., to the Interlocutory Application (Inter Partes) of ABN-AMRO Bank N.V., Canada Branch
Court Sub-File Number:	7:24

2002 01 T 0352

IN THE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR

IN THE MATTER OF a Court ordered
 Receivership of Hickman Equipment (1985)
 Limited ("Hickman Equipment") pursuant to Rule
 25 of the *Rules of the Supreme Court, 1986* under
 the *Judicature Act*, RSNL 1990, c. J-4, as amended

AND IN THE MATTER OF the *Bankruptcy and
 Insolvency Act*, RSC 1985, c. B-3, as amended.

AFFIDAVIT OF DOUGLAS A. DICKER

I, **Douglas A. Dicker**, of the Town of Grimsby, in the Province of Ontario, make oath and say as follows:

1. That I am Division Manager of John Deere Limited, and as such have personal knowledge of the matters herein deposed.
2. That I make this Affidavit in support of a Memorandum of Fact and Law filed in the Supreme Court of Newfoundland and Labrador on behalf of John Deere Credit Inc. ("JDCT") and John Deere Limited ("JDL") (collectively "Deere") on February 7, 2003 (the "Memorandum") in reply to the Interlocutory Application (Inter Partes) of ABN-AMRO Bank N.V., Canada Branch ("AAL").

3. That the AAL Application is made in respect of the proceeds of the sale of the assets of Hickman Equipment, specifically the proceeds of the sale of the following assets:

1.	Valmet Forwarder	8608220	("Claimed Unit #1)
2.	Valmet Harvester	911C4019	("Claimed Unit #2)
3.	John Deere Excavator	FF892EX011686	("Claimed Unit #3)
4.	Tapio Harvesting Head	N/A	("Claimed Unit #4)
5.	John Deere Excavator	FF892EX007239	("Claimed Unit #5)
6.	Fabtek Forwarder	544B032885899	("Claimed Unit #6)
7.	Poulin Screen Plan	2SAAQQ19810285884	("Claimed Unit #7)
8.	Poulin Radial Stacker	2SAAQQ19705139895	("Claimed Unit #8)
9.	Hitachi Excavator	158598	("Claimed Unit #9)
10.	John Deere Dozer	T0450HX874682	("Claimed Unit #10)
11.	Int'l TD 15C Dozer	6349	("Claimed Unit #11)
12.	John Deere Excavator	FF892EX011283	("Claimed Unit #12)
13.	Jhn Deere Dozer	T0450GX809815	("Claimed Unit #13)
14.	John Deere Motor Grader	DW772CH567061	("Claimed Unit #14)
15.	Komatsu Excavator	C10514	("Claimed Unit #15)
16.	Logmax Harvesting Head	734	("Claimed Unit #16)

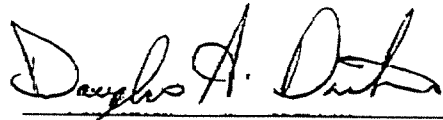
4. That with respect to Claimed Unit #3, JDL intends to rely on a shipping invoice for a 450 LC Forestry Excavator S/N FF0450X090178 ("Claimed Unit #3 Original Collateral") from JDL to Hickman Equipment dated March 27, 1998. Attached as Exhibit "A" to this my Affidavit is a true copy of the said shipping invoice.
5. That with respect to Claimed Unit #4, JDL intends to rely on a shipping invoice for a 160 LC Excavator, S/N P00160X040536 ("Claimed Unit #4 Original Collateral") from JDL to Hickman Equipment dated October 5, 1998. Attached as Exhibit "B" to this my Affidavit is a true copy of the said shipping invoice.

6. That with respect to Claimed Unit #5, JDL intends to rely on a shipping invoice for a 270 LC Excavator, S/N FF0270X070371 ("Claimed Unit #5 Original Collateral") from JDL to Hickman Equipment dated June 17, 1998. Attached as Exhibit "C" to this my Affidavit is a true copy of the said shipping invoice.
7. That with respect to Claimed Unit #9, JDL intends to rely on a shipping invoice for a 330 LC Excavator, S/N FF0330X080543 ("Claimed Unit #9 Original Collateral") from JDL to Hickman Equipment dated July 26, 1999. Attached as Exhibit "D" to this my Affidavit is a true copy of the said shipping invoice.
8. That with respect to Claimed Unit #11, JDL intends to rely on a shipping invoice for a John Deere 850C Crawler Dozer S/N T0850CX873998 ("Claimed Unit #11 Original Collateral") from JDL to Hickman Equipment dated August 12, 1999. Attached as Exhibit "E" to this my Affidavit is a true copy of the said shipping invoice.
9. That with respect to Claimed Unit #12, JDL intends to rely on a shipping invoice for a 330 LC Excavator S/N FF0330X080802 ("Claimed Unit #12 Original Collateral") from JDL to Hickman Equipment dated May 24, 2000. Attached as Exhibit "F" to this my Affidavit is a true copy of the said shipping invoice.
10. That with respect to Claimed Unit #13, JDL intends to rely on a shipping invoice for a 450G Dozer S/N TO450HX883089 dated February 8, 2000 and a 772 CH Motor Grader DW772CH579123 dated January 30, 2001 ("Claimed Unit #13 Original Collateral") from JDL to Hickman Equipment. Attached as Exhibit "G" to this my Affidavit is a true copy of the shipping invoice for the 450G Dozer S/N T0450HX883089 and attached as Exhibit "H" to this my affidavit is a true copy of shipping invoice for the. 772 CH Motor Grader DW772CH579123.
11. That with respect to Claimed Unit #14, JDL intends to rely on a shipping invoice for a 450G Dozer S/N TO450HX883089 dated February 8, 2000 and a 772 CH Motor Grader

DW772C579123 dated January 30, 2001 ("Claimed Unit #14 Original Collateral") from JDL to Hickman Equipment. Attached as Exhibit "G" and "H" to this my Affidavit are true copies of the said shipping invoices.

SWORN to before me at Grimsby,
in the Province of Ontario this 7th day
of February, 2003:



Notary Public

DOUGLAS A. DICKER

COMPLETE GOODS INVOICE
DOCUMENT NUMBER: 040581
DOCUMENT DATE : 27MAR98

PAYABLE TO:
JOHN DEERE LIMITED (CANADA)
GRIMSBY, ON L3M4S9

PAGE 1

CONSIGNEE TO/SOLD TO:
HICKMAN EQUIPMENT (1985) LTD
P.O. BOX 820
TOPSAIL ROAD WEST
MT. PEARL, NF A1N3C8
ACCT NUMBER: 6014 DIV/TER: 52

SHIP TO: (1727)
BALTIMORE DEALER WAREHOUSE
C/O DAILY EXPRESS
4035 N. POINT ROAD
BALTIMORE, MD 21222
DELIVERY POINT: BALTIMORE, MD

SHIPPED DATE: 27MAR98 SHIPPED FROM: DEERE-HITACHI CONST MACH COR KERNERSVILLE
CARRIER: DAILY EXPRESS INC LOAD NO.: 522219 VERSION: R

ORD SHP	QTY	QTY	CODES	DESCRIPTION	HST	NET	PRICE	TOTAL
						ITEMS	EACH	AMOUNT
	1	1	5920FF	450LC BASE EXCAVATOR	T		314070.40	314070.40
			1550	CAB W/AIR & HEATER			3740.80	3740.80
			2650	STD MAINFRAME, CMT & CMD			6415.50	6415.50
			3350	900MM TRACK SHOES			IN BASE	IN BASE
			6835	STANDARD BOOM			47215.00	47215.00
			7250	3.9 ARM 450LC			25088.00	25088.00
			9020	VANDAL PROTECTION			640.50	640.50
			9801	ASSY JAPAN LESS FRONT				
				MACHINE TOTAL			397170.20	397170.20
				FREIGHT - CA	Z		600.00	
							600.00	600.00
				INVOICE TOTAL				397770.20

SERIAL NO. FF0450X090178
DEERE ENG RG6101A508697
MERCHANDISE WEIGHT: 93810 LB
ORDER PLACED THRU JDMINT.

SALES PROGRAM: 3QT2
TERMS CODE 2
PER DEALER: CHG SHIP TO DESTINATION
TO DEALER WAREHOUSE./BD
GST/HST STATUS CODED AS T - TAXABLE,
Z - ZERO-RATED, OR E - EXEMPT. AMOUNT
PAYABLE - DOCUMENT TOTAL PLUS 7% GST/
15% HST ON ITEMS MARKED 'T' (GST/HST
AMOUNT PAYABLE WILL BE IDENTIFIED AS
DEBIT MEMO #GSTAX ON YOUR MONTHLY
STATEMENT).
GST REGISTRATION #133846758.

ADDITIONAL COMMENTS:

BILLED: 27MAR98 TERMS: FINAL DUE: MAY98
MACHCD: T 59200 FACCD: FF VOL: Z
CLASS CODE:
SETTLED: 12JUN98 SETT#: 000953
BY: 6014 QTY: 001 SN: FF0450X090178

THIS IS A COPY OF THE ORIGINAL INVOICE
WITH ADDITIONAL COMMENTS AND/OR ADJUSTMENTS

This is Exhibit "A" referred to in the
affidavit of Douglas A. Dickar
sworn before me, this 7th
day of February, 2003.
Paul J. McLeod
A COMMISSIONER FOR TAKING AFFIDAVITS

02/06/03 THU 15:23 FAX 308 765 3102
DOCUMENT NUMBER: 007575
DOCUMENT DATE: 05OCT98

JDIEC FINANCE / ACCTG
JOHN DEERE LIMITED (CANADA)
GRIMSBY, ON L3M4S9

PAGE 1

01

SOLD TO:
HICKMAN EQUIPMENT (1985) LTD
P.O. BOX 820
TOPSAIL ROAD WEST
MT. PEARL NF A1N3C8

OCT 06 1998

ACCT NUMBER: 6014 DIV/TER: 52

SHQ QTY	CODES	DESCRIPTION	GST/ HST PST	NET ITEMS	PRICE EACH	TOTAL AMOUNT
1		160LC EXCAVATOR DUTY FREIGHT	T T		125162.24	125162.24 .00 .00
		MACHINE TOTAL			125162.24	125162.24
		NET ITEM TOTAL		.00		.00
		INVOICE TOTAL				125162.24

SERIAL NO. P00160X040536

DUE DATE: NOV98

SHIP FROM:
REINVOICE ACCOUNT-BILLING
P.O. BOX 999
GRIMSBY ON L3M4S9

COMMENTS:
SPN: 3DLY, FR RDO EQ., BURNSVILLE, MN
EXISTING TERMS
PROCESSED BY: 7186X
CODES: 1260FF 3250 6835 7180 9030

ACCT NUMBER: 9606 DIV/TER: 99

ORIG BILLDT: 05OCT98
ORIG DUE-DT: 01NOV98

28B
ORIG DOC NO: DD1477601

This is Exhibit "B" referred to in the
affidavit of Douglas A. Dicker
sworn before me, this 7th
day of February, 2003

A COMMISSIONER FOR TAKING AFFIDAVITS

GST/HST STATUS CODED AS T - TAXABLE, Z - ZERO-RATED, OR E - EXEMPT.
AMOUNT PAYABLE = DOCUMENT TOTAL PLUS 7% GST/15% HST ON ITEMS MARKED T.
(GST/HST AMOUNT PAYABLE WILL BE IDENTIFIED AS DEBIT MEMO #GSTAX ON YOUR
MONTHLY STATEMENT). GST REGISTRATION #133846758.

PST APPLIES TO T-CODED GST TRANSACTIONS. PST IS CALCULATED ON THE
GST-INCLUDED AMOUNT AND IS IDENTIFIED AS DEBIT MEMO #PSTAX ON YOUR
MONTHLY STATEMENT. QST REGISTRATION #1015119604.

COMPLETE GOODS INVOICE
DOCUMENT NUMBER: 042339
DOCUMENT DATE : 17JUN98

PAYABLE TO: PAGE 1
JOHN DEERE LIMITED (CANADA)
GRIMSBY, ON L3M4S9

CONSIGNEE TO/SOLD TO:
HICKMAN EQUIPMENT (1985) LTD
P.O. BOX 820
TOPSAIL ROAD WEST
MT. PEARL, NF A1N3C8
ACCT NUMBER: 6014 DIV/TER: 52

SHIP TO: (1727)
BALTIMORE DEALER WAREHOUSE
C/O DAILY EXPRESS
4035 N. POINT ROAD
BALTIMORE, MD 21222
DELIVERY POINT: BALTIMORE, MD

SHIPPED DATE: 17JUN98 SHIPPED FROM: DEERE-HITACHI CONST MACH COR KERNERSVILLE
CARRIER: DAILY EXPRESS INC LOAD NO.: 136714 VERSION: R

This is Exhibit "C" referred to in the
affidavit of Douglas A. Disker
sworn before me, this 7th
day of February 2003

A COMMISSIONER FOR TAKING AFFIDAVITS

ORD SHP	NET	PRICE	TOTAL
QTY QTY CODES DESCRIPTION HST ITEMS EACH AMOUNT			
1 1 1240FF	270LC EXCAVATOR BASE T	189046.90	189046.90
3350	SHOES BOOM 32" TRIPLE	IN BASE	IN BASE
6835	BOOM ONE PIECE W/CYL/PLUM	21131.60	21131.60
7160	ARM 3.75M(12'4") W/BKT	13696.20	13696.20
8180	CAB/AIR CONDITIONING	3740.80	3740.80
9020	VANDAL PROTECTION	640.50	640.50
9801	FULLY ASSEMBLED IN JAPAN		
	MACHINE TOTAL	228256.00	228256.00
	FREIGHT - CA 2	581.80	
		581.80	581.80
	INVOICE TOTAL		228837.80

SERIAL NO. FF0270X070371
DEERE ENG T0606BH752272

MERCHANDISE WEIGHT: 59245 LB

ORDER PLACED THRU JDMINT.

SALES PROGRAM: 3QT1
TERMS CODE 1
PER EDWARD HEAD/YUKTO: CHG SHIP
TO DESTINATION TO DEALER WAREHOUSE./B
D
GST/HST STATUS CODED AS T - TAXABLE,
Z - ZERO-RATED, OR E - EXEMPT. AMOUNT
PAYABLE = DOCUMENT TOTAL PLUS 7% GST/
15% HST ON ITEMS MARKED 'T' (GST/HST
AMOUNT PAYABLE WILL BE IDENTIFIED AS
DEBIT MEMO #GSTAX ON YOUR MONTHLY
STATEMENT).
GST REGISTRATION #133846758.

ADDITIONAL COMMENTS:

BILLED: 17JUN98 TERMS: 03+03 DUE: APR99
MACHCD: T 12400 FACCD: FF VOL: Z
CLASS CODE:
PD FOR: 12JUL99 SETT#: 001428
BY: 6014 QTY: 001 SN: FF0270X070371
SETTLED: 28OCT99 SETT#: 001608
BY: 6014 QTY: 001 SN: FF0270X070371

THIS IS A COPY OF THE ORIGINAL INVOICE
WITH ADDITIONAL COMMENTS AND/OR ADJUSTMENTS

COMPLETE GOODS INVOICE
DOCUMENT NUMBER: 045573
DOCUMENT DATE : 26JUL99

PAYABLE TO: PAGE 1
JOHN DEERE LIMITED (CANADA)
GRIMSBY, ON L3M4S9

CONSIGNEE TO/SOLD TO:
HICKMAN EQUIPMENT (1985) LTD
P.O. BOX 820, STN. MT. PEARL
TOPSALE ROAD WEST
MT. PEARL, NF A1W3C8
ACCT NUMBER: 6014 DIV/TER: 52

SHIP TO:
DELIVERY POINT: KERNERSVILLE, NC

SHIPPED DATE: 26JUL99 SHIPPED FROM: DEERE-MITACHI CONST MACH COR KERNERSVILLE
CARRIER: DEALER TRUCK LOAD NO.: 646675 VERSION: R

ORD SHP	QTY	QTY	CODES	DESCRIPTION	HST	NET	PRICE	TOTAL
						ITEMS	EACH	AMOUNT
	1	1	1250FF	330LC BASE ASSY IN JAPAN T			227740.80	227740.80
			330D	BOOM SEMI-GROUSER SHOE			IN BASE	IN BASE
			6035	BOOM, 1 PC			20160.00	20160.00
			7267	ARM 4.00M 13'1" W/BKT CYL			15424.50	15424.50
				MACHINE TOTAL			263325.30	263325.30
				WILL CALL CHARGE - END	T	110.25		
						110.25		110.25
				INVOICE TOTAL				263435.55

SERIAL NO. FF0330X080543
DEERE ENG R66081H082656
MERCHANDISE WEIGHT: 72032 LB

SALES PROGRAM: XSTR
"AUTOMATIC STOCK-UP OR
REPLENISHMENT ORDER"
FACTORY DELIVERY DATE: 12AUG99
REQUESTED DELIVERY DATE: 12AUG99
GST/HST STATUS CODED AS T - TAXABLE.
Z - ZERO-RATED, OR E - EXEMPT. AMOUNT
PAYABLE = DOCUMENT TOTAL PLUS 7% GST/
15% HST ON ITEMS MARKED 'T' (GST/HST
AMOUNT PAYABLE WILL BE IDENTIFIED AS
DEBIT MEMO #GSTAX ON YOUR MONTHLY
STATEMENT).
GST REGISTRATION #133846758.

ADDITIONAL COMMENTS:

BILLED: 26JUL99 TERMS: 03+03 DUE: MAY00
MACHCD: T 12510 FACCD: FF VOL: Z
CLASS CODE:
PD FOR: 30JUL99 SETT#: 001485
BY: 6014 QTY: 001 SN: FF0330X080543
RECORD (CREDIT) #018586 DATED 16SEP99
BOOM & ARM CREDIT
SETTLED: 19OCT01 SETT#: 002640
BY: 6014 QTY: 001 SN: FF0330X080543

THIS IS A COPY OF THE ORIGINAL INVOICE
WITH ADDITIONAL COMMENTS AND/OR ADJUSTMENTS

"D"
This is Exhibit.....referred to in the
affidavit of.....Douglas A. Dicker
sworn before me, this.....7th
day of.....February.....2003
A COMMISSIONER FOR TAKING AFFIDAVITS

02/06/03 THU 15:23 FAX 308 765 3102

DOCUMENT NUMBER: 008845
DOCUMENT DATE: 12AUG99

JDIEC FINANCE / ACCTG
PAIDABLE TO:
JOHN DEERE LIMITED (CANADA)
GRIMSBY, ON L3M4S9

PAGE 1

002

SOLD TO:
HICKMAN EQUIPMENT (1985) LTD
P.O. BOX 820, STN. MT. PEARL
TOPSAIL ROAD WEST
MT. PEARL NF A1N3C8

081 799

ACCT NUMBER: 6014 DIV/TER: 52

SHP QTY	CODES	DESCRIPTION	GST/ HST PST	NET ITEMS	PRICE EACH	TOTAL AMOUNT
1		850C CRAWLER DOZER	T		217831.68	217831.68
		DUTY	T			.00
		FREIGHT				.00
		MACHINE TOTAL			217831.68	217831.68
		NET ITEM TOTAL		.00		.00
		INVOICE TOTAL				217831.68

SERIAL NO. T0850CX873998

DUE DATE: SEP99

SHIP FROM:
REINVOICE ACCOUNT-BILLING
P.O. BOX 999
GRIMSBY ON L3M4S9

COMMENTS:
SPN XRTL FR EMPIRE EQ., SACRAMENTO, CA
EXISTING TERMS
PROCESSED BY: 7186X

ACCT NUMBER: 9606 DIV/TER: 99

CODES: 7850T 1035 2025 3175 3700 4045 5085 7095
8325 8545 9025 9065 9070 9150 9245

ORIG BILDT: 16AUG99

280

ORIG DUE-DT: 01SEP99

ORIG DOC NO: DD1770301

This is Exhibit "E" referred to in the
affidavit of Douglas A. Dicker
sworn before me, this 7th
day of February 2003.

A COMMISSIONER FOR TAKING AFFIDAVITS

GST/HST STATUS CODED AS T - TAXABLE, Z - ZERO-RATED, OR E - EXEMPT.
AMOUNT PAYABLE = DOCUMENT TOTAL PLUS 7% GST/15% HST ON ITEMS MARKED T.
(GST/HST AMOUNT PAYABLE WILL BE IDENTIFIED AS DEBIT MEMO #GSTAX ON YOUR
MONTHLY STATEMENT). GST REGISTRATION #133846758.

PST APPLIES TO T-CODED GST TRANSACTIONS. PST IS CALCULATED ON THE
GST-INCLUDED AMOUNT AND IS IDENTIFIED AS DEBIT MEMO #PSTAX ON YOUR
MONTHLY STATEMENT. QST REGISTRATION #1015119604.

COMPLETE GOODS INVOICE
DOCUMENT NUMBER: 047957
DOCUMENT DATE : 24MAY00

PAYABLE TO: PAGE 1
JOHN DEERE LIMITED (CANADA)
GRIMSBY, ON L3M4S9

CONSIGNEE TO/SOLD TO:
HICKMAN EQUIPMENT (1985) LTD
P.O. BOX 820, STM. MT. PEARL
TOPSAIL ROAD WEST
MT. PEARL, NF A1N3C8
ACCT NUMBER: 6014 DIV/TER: 52

SHIP TO:
DELIVERY POINT: KERNERSVILLE, NC

SHIPPED DATE: 23MAY00 SHIPPED FROM: DEERE-HITACHI CONST MACH COR KERNERSVILLE
CARRIER: DEALER TRUCK LOAD NO.: 334192 VERSION: R

ORD SHP	NET	PRICE	TOTAL
QTY QTY CODES DESCRIPTION HST ITEMS EACH AMOUNT			
1 1 1250FF 330LC BASE ASSY IN JAPAN T	227740.80	227740.80	
3300 BOOM SEMI-GROUSER SHOE	IN BASE	IN BASE	
6835 BOOM, 1 PC	20160.00	20160.00	
7267 ARM 4.0DM 13'1" W/BKT CYL	15424.50	15424.50	
MACHINE TOTAL	263325.30	263325.30	
WILL CALL CHARGE - IND T	109.50		
	109.50		109.50
INVOICE TOTAL			263434.80

SERIAL NO. FF0330X080802
DEERE ENG R660B1K099001
MERCHANDISE WEIGHT: 72032 LB

SALES PROGRAM: XSTR
"AUTOMATIC STOCK-UP OR
REPLENISHMENT ORDER"
FACTORY DELIVERY DATE: 11MAY00
REQUESTED DELIVERY DATE: 11MAY00
GST/HST STATUS CODED AS T - TAXABLE,
Z - ZERO-RATED, OR E - EXEMPT. AMOUNT
PAYABLE - DOCUMENT TOTAL PLUS 7% GST/
15% HST ON ITEMS MARKED 'T' (GST/HST
AMOUNT PAYABLE WILL BE IDENTIFIED AS
DEBIT MEMO #GSTAX ON YOUR MONTHLY
STATEMENT).
GST REGISTRATION #133846758.

ADDITIONAL COMMENTS:

BILLED: 24MAY00 TERMS: 03+03 DUE: MAR01
MACHCD: T 12510 FACCD: FF VOL: Z
CLASS CODE:
PD FOR: 15JUN00 SETT#: 001881
BY: 6014 QTY: 001 SN: FF0330X080802
RECORD (CREDIT) #020337 DATED 22JUN00
BOOM & ARM CREDIT
SETTLED: 08AUG00 SETT#: 001960
BY: 6014 QTY: 001 SN: FF0330X080802

"F"
This is Exhibit.....referred to in the
affidavit of Douglas A. Dicker
sworn before me, this 7th
day of February, 2003
Paul E. McL...
A COMMISSIONER FOR TAKING AFFIDAVITS

THIS IS A COPY OF THE ORIGINAL INVOICE
WITH ADDITIONAL COMMENTS AND/OR ADJUSTMENTS

COMPLETE GOODS INVOICE
DOCUMENT NUMBER: 047118
DOCUMENT DATE : 08FEB00

PAYABLE TO: PAGE 1
JOHN DEERE LIMITED (CANADA)
GRIMSBY, ON L3M4S9

CONSIGNEE TO/SOLD TO:
WICKMAN EQUIPMENT (1985) LTD
P.O. BOX 820, STN. MT. PEARL
TOPSAIL ROAD WEST
MT. PEARL, NF A1N3C8
ACCT NUMBER: 6014 DIV/TER: 52

SHIP TO:
DELIVERY POINT: DUBUQUE, IA

SHIPPED DATE: 08FEB00 SHIPPED FROM: J.D. DUBUQUE WORKS DUBUQUE
CARRIER: DEALER TRUCK LOAD NO.: 077993 VERSION: R

ORD SHP	QTY	QTY	CODES	DESCRIPTION	HST	NET	PRICE	TOTAL
						ITEMS	EACH	AMOUNT
I	1	1900T		450H CRAWLER DOZER	T		61107.75	61107.75
		1075		450H LOW GROUND PRESSURE			4005.00	4005.00
		1175		TURBO ENGINE FOR LGP			1236.75	1236.75
		4570		24" LUBED CLO.CTR TRK SHO			3065.25	3065.25
		4885		ROCK GUARDS LT & LGP			833.25	833.25
		5085		CAB W/ HEATER & AIR COND.			12374.25	12374.25
		5475		DASH & MONITOR & GAUGES			99.00	99.00
		5875		DELUXE CLOTH SUSPENDED SE			375.00	375.00
		6075		DUAL HEAVY DUTY BATTERY			198.00	198.00
		7065		115" BLADE & C FRAME			9918.00	9918.00
		7725		THREE FUNCTION VALVE				
		7925		HYD PUMP F USE W/O WINCH				
		9015		ETHER START AID			239.25	239.25
		9165		VEHICLE LIGHTING SYSTEM			205.50	205.50
				MACHINE TOTAL			93657.00	93657.00
				INVOICE TOTAL				93657.00

SERIAL NO. T0450HX8B3089
DEERE ENG T04045TB41376
MERCHANDISE WEIGHT: 17988 LB

SALES PROGRAM: XSTR
"AUTOMATIC STOCK-UP OR
REPLENISHMENT ORDER"
FACTORY DELIVERY DATE: 09FEB00
REQUESTED DELIVERY DATE: 09FEB00
GST/HST STATUS CODED AS T - TAXABLE,
Z - ZERO-RATED, OR E - EXEMPT. AMOUNT
PAYABLE = DOCUMENT TOTAL PLUS 7% GST/
15% HST ON ITEMS MARKED 'T' (GST/HST
AMOUNT PAYABLE WILL BE IDENTIFIED AS
DEBIT MEMO #GSTAX ON YOUR MONTHLY
STATEMENT).
GST REGISTRATION #133846758.

ADDITIONAL COMMENTS:

BILLED: 08FEB00 TERMS: 03+03 DUE: DEC00
MACHCD: T 19030 FACCD: T3 VOL: Z
CLASS CODE:
PD FOR: 14MAR00 SETT#: 001786
BY: 6014 QTY: 001 SN: T0450HX8B3089
SETTLED: 15FEB01 SETT#: 002281
BY: 6014 QTY: 001 SN: T0450HX8B3089

This is Exhibit "G" referred to in the
affidavit of Douglas A. Dickson
sworn before me, this 7th
day of February 2003
Paul E. McLeod
A COMMISSIONER FOR TAKING AFFIDAVITS

COMPLETE GOODS INVOICE

DOCUMENT NUMBER: 047118

DOCUMENT DATE : DBFEB08

CONSIGNED TO/ HICKMAN EQUIPMENT (1985) LTD PAGE 2

SOLO TO: P.O. BOX 820, STM. MT. PEARL

TOPSAIL ROAD WEST

MT, PEARL, NF 11N3C8

ACCT NUMBER: 6014

WITH ADDITIONAL COMMENTS AND/OR ADJUSTMENTS

COMPLETE GOODS INVOICE
DOCUMENT NUMBER: 050823
DOCUMENT DATE : 30JAN01

PAYABLE TO: PAGE 1
JOHN DEERE LIMITED (CANADA)
GRTHSBY, ON L3M4S9

CONSIGNED TO/SOLD TO:
HICKMAN EQUIPMENT(1985) LTD.
P.O. BOX B20, STN. MT. PEARL
TOPSAIL ROAD WEST
MT. PEARL, NF A1N3C8
ACCT NUMBER: 6014 DIV/TER: 43

SHIP TO: (6015)
HICKMAN EQUIPMENT(1985) LTD.
61 MAPLE VALLEY ROAD
BOX 1074
CORNERBROOK, NF A2H6T3
DELIVERY POINT: DAVENPORT, 1A

SHIPPED DATE: 30JAN01 SHIPPED FROM: J.D. DUBUQUE WORKS DAVENPORT
CARRIER: DEALER TRUCK LOAD NO.: 904918 VERSION: R

ORD SHP	QTY	QTY	CODES	DESCRIPTION	HST	NET	PRICE	TOTAL
						ITEMS	EACH	AMOUNT

1	1	9772T		772CH MOTOR GRADER	T		232950.75	232950.75
		1150		HIGH SPEED FRT. WHEEL DR.			2923.50	2923.50
		2065		14FT MOLEBOARD W/BIN EDGE			1032.75	1032.75
		4477		17.5R25 XTLA TIRES			4025.25	4025.25
		5075		LOW CAB W/AIR COND & PRES			6275.25	6275.25
		6030		DELUXE CLOTH SEAT W/SUSPE			623.25	623.25
		7002		1400 CCA BATTERY			243.00	243.00
		9014		OVERLAY END BITS			331.50	331.50
		9032		24/12V SAMP RADIO CONVERT			158.25	158.25
		9050		ENGINE HEATER (110V, 1000			59.25	59.25
		9055		HYDRAULIC PUMP DISCONNECT			120.75	120.75
		9056		TOOLBOX			69.75	69.75
		9063		20000 BTU HEATER			579.75	579.75
		9082		DUAL DEFROSTER FAN			306.00	306.00
		9107		FRONT & REAR WINDSHD WASH			210.00	210.00
		9109		REAR WIPER			247.50	247.50
		9110		WIPERS & WASHERS , FRT,LO			737.25	737.25
		9112		OPEN WINDOW LOWER FRONT			369.75	369.75
		9150		FLOOR MAT			126.75	126.75
		9160		BEACON SWITCH & WIRING			24.00	24.00
		9164		FRONT & REAR WORK LIGHTS			459.00	459.00
		9166		BLADE LIGHTS			225.75	225.75
		9170		24V RADIO			744.75	744.75
		9382		R.RIPP/SCARIF.COMBI W/F H			15247.50	15247.50
		9907		MICHELIN TIRES				
				MACHINE TOTAL			268091.25	268091.25

INVOICE TOTAL 268091.25

SERIAL NO. DW772CH579123
DEERE ENG RG6081H128486

MERCHANDISE WEIGHT: 33570 LB

RETAIL CUSTOMER INFORMATION:
RETAIL DATE 21DEC00
ISLAND AGGREGATES & READY MX
P.O. BOX 1349
DEER LAKE NF A0K 2E0
PREFERRED DELIVERY 22DEC00

ORDER PLACED THRU JDMINT.

SALES PROGRAM: XRTL
TERMS CODE 2
FACTORY DELIVERY DATE: 30JAN01
REQUESTED DELIVERY DATE: 21DEC00
GST/HST STATUS CODED AS T - TAXABLE,
Z - ZERO-RATED, OR E - EXEMPT. AMOUNT
PAYABLE = DOCUMENT TOTAL PLUS 7% GST/
15% HST ON ITEMS MARKED 'T' (GST/HST
AMOUNT PAYABLE WILL BE IDENTIFIED AS
DEBIT MEMO @GSTAX ON YOUR MONTHLY
STATEMENT).
GST REGISTRATION #133846758.

ADDITIONAL COMMENTS:

This is Exhibit "H" referred to in the
affidavit of Douglas A. Dicker
sworn before me, this 7th
day of February 2003
Paul S. F. Cond
A COMMISSIONER FOR TAKING AFFIDAVITS

COMPLETE GOODS INVOICE
DOCUMENT NUMBER: D50823
DOCUMENT DATE : 30JAN01

CONSIGNED TO/ HICKMAN EQUIPMENT(1985) LTD. PAGE 2
SOLD TO: P.O. BOX 820, STM. MT. PEARL
TOPSAIL ROAD WEST
MT. PEARL, NF 11N3C8
ACCT NUMBER: 6014

BILLED:30JAN01 TERMS:FINAL DUE:APR01
MACHCD:T 96900 FACCD:03 VOL:Z
CLASS CODE:
PD FOR: 15FEB01 SETT#:002274
BY:6014 QTY:001 SN:DW772CH579123
SETTLED:15FEB01 SETT#:002281
BY:6014 QTY:001 SN:DW772CH579123

THIS IS A COPY OF THE ORIGINAL INVOICE
WITH ADDITIONAL COMMENTS AND/OR ADJUSTMENTS