

This is the 1st affidavit of
S. Brown-John in this case and was
made on May 25, 2023

No. S-228723
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c.
C-36

AND

IN THE MATTER OF THE *BUSINESS CORPORATIONS ACT*, S.B.C. 2002, c. 57

AND

IN THE MATTER OF THE PLAN OF COMPROMISE AND ARRANGEMENT OF
PURE GOLD MINING INC.

PETITIONER

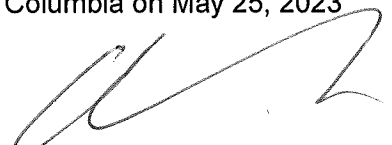
AFFIDAVIT

I, **Sandra Brown-John**, of 2600 – 595 Burrard Street, Vancouver, British Columbia, Legal
Administrative Assistant, SWEAR (THAT:


1. I am a legal administrative assistant at Blake, Cassels & Graydon LLP ("**Blakes**"),
the solicitors for Pure Gold Mining Inc., the Petitioner in this proceeding, and as such I have
personal knowledge of the matters deposed to in this Affidavit except where I depose to a matter
based on information from an informant I identify in which case I believe that both the information
from the informant and the resulting statement are true.

2. Attached and marked as Exhibit "A" is a copy of an email from Sage Nematollahi
to Peter Rubin, Peter Bychawski, and Sean Boyle of Blakes dated March 6, 2023 and subsequent
correspondence.

SWORN BEFORE ME at Vancouver, British
Columbia on May 25, 2023



A Commissioner for taking Affidavits for
British Columbia



Sandra Brown-John

ANDREW KAVANAGH
Barrister & Solicitor
BLAKE, CASSELS & GRAYDON LLP
Suite 2800, Three Bentall Centre
595 Burrard St., P.O. Box 49314
Vancouver, B.C. V7X 1L3
(604) 631-3388

This is Exhibit "A" referred to in the Affidavit of Sandra Brown-John sworn before me at Vancouver, British Columbia this 25th day of May, 2023



A Commissioner for Taking Affidavits
for British Columbia

Brown-John, Sandra

From: Sage Nematollahi <sn@knd.law>
Sent: Thursday, March 9, 2023 8:08 AM
To: Rubin, Peter
Cc: Bychawski, Peter; Boyle, Sean; Eli Karp; Taek Soo Shin; Kibben Jackson
Subject: Re: Pure Gold Mining Inc. - Scoping Study

External Email | Courrier électronique externe

Hi Peter:

While you are considering and seeking instructions in regard to our request to produce the Scoping Study, I wanted to also mention that please also consider our request to produce any available insurance policies that may be responsive to the claims asserted against any of the defendants, from whatever source (for example, hypothetically, any insurance policy that may be available to Mr O'dea from outside of PureGold, including through Oxygen Capital, if any).

Lastly, as you know, the Court has directed that we schedule a case planning conference through filing a request to appear. We would suggest a call amongst counsel to discuss next steps before we file the request to appear.

Thanks
Sage

Sage Nematollahi (he/him)
+ 1 (236) 888-7700

On Mar 8, 2023, at 7:35 AM, Sage Nematollahi <sn@knd.law> wrote:

Hi Peter. Ok. Thanks

Sage Nematollahi (he/him)
+ 1 (236) 888-7700

On Mar 7, 2023, at 10:21 PM, Rubin, Peter <peter.rubin@blakes.com> wrote:

Sage,

Your email of yesterday has been received. We will need some time to consider and take instructions. We will get back to you as soon as we can.

Peter

Peter Rubin*
Partner
peter.rubin@blakes.com
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* denotes law corporation

Blake, Cassels & Graydon LLP
595 Burrard Street, Suite 2600, Vancouver BC V7X 1L3 (Map)
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From: Sage Nematollahi <sn@knd.law>
Sent: Monday, March 6, 2023 6:55 AM
To: Rubin, Peter <peter.rubin@blakes.com>; Bychawski, Peter <peter.bychawski@blakes.com>; Boyle, Sean <sean.boyle@blakes.com>
Cc: Eli Karp <ek@knd.law>; Taek Soo Shin <ts@knd.law>; Kibben Jackson <kjackson@fasken.com>
Subject: Pure Gold Mining Inc. - Scoping Study

External Email | Courrier électronique externe

Good morning, Counsel:

Further to paragraph 6 of Mr. Haubrich's 5th affidavit affirmed on March 2, 2023, paragraph 3.0(1) of the Monitor's Third Report dated March 2, 2023, and your client's news release filed on SEDAR today, we request that a copy of the Scoping Study that has been prepared in relation to the PureGold Mine be provided to us for inspection, unless your client is planning to file it on SEDAR, as it probably should, in which case please advise.

If you have any questions, please do not hesitate to let us know.

Thank you
Sage

Sage Nematollahi (he/him)
Lawyer (Admitted in BC, ON & NY)

KND Complex Litigation

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