



This is Affidavit #1
of Kibben Jackson in this case
and was made on January 18, 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, AS AMENDED

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, Kibben Jackson, lawyer, of 2900 - 550 Burrard Street, Vancouver British Columbia,
AFFIRM THAT:

1. I am a partner at Fasken Martineau DuMoulin LLP ("**Fasken**"), counsel for KSV Restructuring Inc. (the "**Monitor**") in its capacity as monitor of Pure Gold Mining Inc., and as such have personal knowledge of the facts hereinafter deposed to except where such facts are stated to be on information and belief, and in such cases I verily believe them to be true.
2. I am the lawyer at Fasken that has had primary carriage of this matter, and I am authorized to make this affidavit on behalf of Fasken.
3. I make this affidavit in support of an application by the Monitor for, among other things, approval of the interim fees and disbursements of the Monitor and its counsel, Fasken, incurred in connection with these proceedings.

4. Attached hereto collectively as **Exhibit “A”** and marked as indicated are copies of the covering pages of the following invoices (collectively, “**Fasken’s Invoices**”) issued by Fasken to the Monitor showing fees for services rendered and disbursements incurred so far in this matter:

| Invoice | Date | Fees (\$) | Disbursements (\$) | HST (\$) | PST (\$) | Total (\$) |
|----------------|----------------------|----------------------|-------------------------------|---------------------|---------------------|-----------------------|
| 1780042 | November 7, 2022 | \$10,356.00 | | \$1,346.28 | \$724.92 | \$12,427.20 |
| 1794462 | December 14, 2022 | \$33,816.00 | \$175.40 | \$4,417.97 | \$2,367.12 | \$40,776.49 |
| 1811035 | January 17, 2023 | \$1,469.50 | \$14.80 | \$192.96 | \$102.86 | \$1,780.12 |
| TOTAL | | | | | | \$54,983.81 |

5. As detailed in Fasken’s Invoices, from the period immediately prior to the date of the Initial Order (October 31, 2022) through to December 31, 2022, Fasken invoiced fees amounting to \$45,641.50 and incurred and invoiced for disbursements in the amount of \$190.20 and taxes in the amount of \$9,152.11, for a total of \$54,983.81 (“**Fasken’s Fees**”). Fasken has received payment for the first two invoices of Fasken’s Fees. The Monitor has reviewed Fasken’s invoices and concluded that Fasken’s Fees are reasonable.

6. Fasken’s Fees as set out in Fasken’s Invoices are calculated on the basis of the hours spent by Fasken personnel, multiplied by the applicable standard hourly rates charged by Fasken. To the best of my knowledge, information and belief, the hourly rates reflected in Fasken’s Invoices and below are commensurate with those charged by other law firms for work of a similar nature and complexity in British Columbia.

7. A number of Fasken lawyers and staff have expended time on this matter. Following is a summary of each timekeeper listed on Fasken’s Invoices, each timekeeper’s hourly rate, as applicable, and the hours worked by each such individual:

| Timekeeper | Hours | Rate | Total Fees Billed |
|--------------------------------|--------------|-------------|--------------------------|
| Kibben Jackson, partner | 36.6 | \$735 | \$26,901 |
| Glen Nesbitt, associate | 29.2 | \$550 | \$16,060 |
| Suzanne Volkow, paralegal | 2 | \$365 | \$730 |
| Rebecca Nguinambaye, associate | 0.8 | \$395 | \$316 |
| Fergus McDonnell, associate | 0.3 | \$550 | \$165 |
| TOTAL | | | \$44,172 |

8. I hereby confirm that:

- (a) I am a member in good standing of the Law Society of British Columbia and have been so since being called to the bar in British Columbia in 2001. I am a partner at Fasken and practice in the area of insolvency and restructuring.
- (b) Glen Nesbitt is an associate with Fasken. He was called to the bar in British Columbia in 2014 and practices in the area of insolvency and restructuring. He is a member in good standing of the Law Society of British Columbia.
- (c) Rebecca Nguinambaye is an associate with Fasken. She was called to the bar in British Columbia in 2022 and practices in the area of insolvency and restructuring. She is a member in good standing of the Law Society of British Columbia.
- (d) Fergus McDonnell was an associate with Fasken at the time he worked on this matter (he is now a partner at Fasken). He was called to the bar in British Columbia in 2015 and practices in the area of insolvency and restructuring as well as general corporate law. He is a member in good standing of the Law Society of British Columbia.

9. To the best of my knowledge, information and belief, the information contained in Fasken's Invoices is true and accurate in all respects as to:

- (a) the number of hours worked;

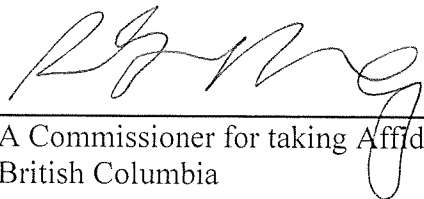
- (b) the nature of work performed;
- (c) the identity of the individuals who performed work; and
- (d) the rates charged for the work performed.

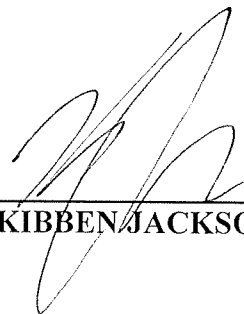
10. I have reviewed Fasken’s Invoices and do verily believe that:

- (a) Fasken’s professional fees and disbursements as reflected thereupon were properly incurred and are fair and reasonable in the circumstances;
- (b) the work completed by Fasken was delegated to the appropriate professionals with the appropriate seniority and hourly rates;
- (c) Fasken’s Fees are consistent with the fees charged by similar firms with the capacity to handle a matter of comparable size and complexity;
- (d) Fasken’s Invoices were provided to the Monitor when rendered and all have been approved by the Monitor; and
- (e) the services reflected in Fasken’s Invoices were performed by Fasken in a prudent and economical manner.

11. I make this affidavit expressly for the purposes of the Monitor’s application seeking approval of its accounts and Fasken’s Fees, and for no other purpose. Nothing herein is intended to be a waiver of solicitor-client privilege by the Monitor.

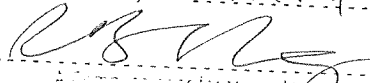
AFFIRMED BEFORE ME at Vancouver,)
British Columbia, on January 18, 2023)


 _____)
 A Commissioner for taking Affidavits for)
 British Columbia)


 _____)
KIBBEN JACKSON)

REBECCA BARCLAY NGUINAMBAYE
 Barrister & Solicitor
 Fasken Martineau DuMoulin LLP
 2900 - 550 Burrard Street
 Vancouver, BC V6C 0A3
 604 631 3245

This is Exhibit - A referred to in the af-
fidavit of KIBBEN JACKSON
sworn before me at VANCOUVER
this _____ day of JANUARY 2023.


A Commissioner for the
Province of British Columbia

FASKEN

Fasken Martineau DuMoulin LLP
Barristers and Solicitors
Patent and Trade-mark Agents

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Vancouver, British Columbia V6C 0A3
Canada

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F +1 604 631 3232

fasken.com

KSV Advisory Inc.
150 King Street West
Suite 2308
Toronto ON M5H 1J9

November 07, 2022
Invoice #: 1780042

GST/HST#: 87937 6127
QST#: 1023151835

Attention: Mr Bobby Kofman

Matter Number: 267908.00015
Matter: Pure Gold Mining Inc.

For Professional Services rendered through October 31, 2022 as described in the attached memorandum.

| | |
|-------------------------------------|-------------------------|
| Total Fees | \$ 10,356.00 |
| Total Taxes | 2,071.20 |
| Total Amount Owing This Bill | CAD \$ 12,427.20 |

Tax Summary

| | |
|--|-----------------|
| BCPST | 724.92 |
| HST | 1,346.28 |
| Total Taxes Included in This Bill | 2,071.20 |

Fasken Martineau DuMoulin LLP



This account has been reviewed, verified and approved by
K.M. Jackson who has authorized the signing and rendering of
this account.
E. & O.E.

Accounts are due when rendered.

*Fasken does not alter its payment instructions.
If you receive new payment instructions in relation to your payment to Fasken, please disregard and notify us immediately.*

SCOTIABANK, 595 Burrard St. P.O. Box 48700
Bentall Centre Vancouver, BC V7X 1V6
Account Name: Fasken Martineau DuMoulin LLP
CAD Account No: 014201126512, Transit No.: 03020, Bank Code: 002
Canadian Clearing Code: //CC000203020 SWIFT Code: NOSCCATT
Please send a payment notice to vanar@fasken.com

FASKEN

Fasken Martineau DuMoulin LLP
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fasken.com

KSV Advisory Inc.
150 King Street West
Suite 2308
Toronto ON M5H 1J9

December 14, 2022
Invoice #: 1794462

GST/HST#: 87937 6127
QST#: 1023151835

Attention: Mr Bobby Kofman

Matter Number: 267908.00015
Matter: Pure Gold Mining Inc.

For Professional Services rendered through November 30, 2022 as described in the attached memorandum.

| | |
|-------------------------------------|-------------------------|
| Total Fees | \$ 33,816.00 |
| Total Taxable Disbursements | 168.40 |
| Total Non Taxable Disbursements | 7.00 |
| Total Disbursements | 175.40 |
| Total Taxes | 6,785.09 |
| Total Fees, Disbursements and Taxes | 40,776.49 |
| Total Amount Owing This Bill | CAD \$ 40,776.49 |

Tax Summary

| | |
|-----------------------------------|----------|
| BCPST | 2,367.12 |
| HST | 4,417.97 |
| Total Taxes Included in This Bill | 6,785.09 |

Fasken Martineau DuMoulin LLP



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KSV Advisory Inc.
150 King Street West
Suite 2308
Toronto ON M5H 1J9

January 17, 2023
Invoice #: 1811035

GST/HST#: 87937 6127
QST#: 1023151835

Attention: Mr Bobby Kofman

Matter Number: 267908.00015
Matter: Pure Gold Mining Inc.

For Professional Services rendered through December 31, 2022 as described in the attached memorandum.

| | |
|--------------------------------------|--------------------------------------|
| Total Fees | \$ 1,469.50 |
| Total Taxable Disbursements | 14.80 |
| Total Disbursements | <u>14.80</u> |
| Total Taxes | 295.82 |
| Total Fees, Disbursements and Taxes | <u>1,780.12</u> |
| Total Amount Owning This Bill | <u><u>CAD \$ 1,780.12</u></u> |

Tax Summary

| | |
|-----------------------------------|----------------------|
| BCPST | 102.86 |
| HST | <u>192.96</u> |
| Total Taxes Included in This Bill | <u><u>295.82</u></u> |

Fasken Martineau DuMoulin LLP



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