



This is Affidavit #1 of
Forrest Finn in this case and
was made on November 20, 2023

NO. VLC-S-S-231065
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

PEAKHILL CAPTIAL INC.

PETITIONER

AND:

SOUTHVIEW GARDENS LIMITED PARTNERSHIP, 1441898 B.C. LTD., SOUTHVIEW
GARDENS PROPERTIES LTD., ZHEN YU ZHONG, JUNCHAO MO, COROMANDEL
PROPERTIES (2016) LTD., BAYSHORE PROPERTIES (2016) LTD., AND COROMANDEL
HOLDINGS LTD.

A F F I D A V I T

I, **Forrest Finn**, lawyer of 2200 – 885 West Georgia Street, Vancouver, British
Columbia, AFFIRM THAT:

1. I am an associate at Cassels Brock & Blackwell LLP ("**Cassels**"), counsel for KSV Restructuring Inc., the court-appointed receiver (the "**Receiver**") of all the assets, undertakings and business of Southview Gardens BT Ltd., Southview Gardens Limited Partnership, and Southview Gardens Properties Ltd. as they relate to the land legally described as Lot 14, District Lot 334, Plan 13993, PID 007-982-160 (municipally known as 3240 East 58th Avenue, Vancouver, British Columbia) and the buildings thereon (the "**Real Property**"), together with the Real Property itself, and including the proceeds thereof. As such, I have personal knowledge of the facts hereinafter deposed to except where stated to be on information and belief, in which case I verily believe them to be true.
2. I am one of the individuals at Cassels that has had primary carriage of this proceeding.
3. This affidavit is filed in support of the application by the Receiver for approval of the fees and disbursements of Cassels. The fees and disbursements sought to be approved cover this receivership proceeding (the "**Receivership**") from inception to October 31, 2023 and include

an estimate of Cassels' fees up to the completion of the Receivership and the discharge of the Receiver.

4. Attached hereto and marked as indicated are the following Exhibits (together the "Invoices"):

Exhibit	Invoice Number	Invoice Date	Amount
"A"	2196211	March 31, 2023	\$90,306.62
"B"	2199946	May 11, 2023	\$20,764.88
"C"	2204474	June 29, 2023	\$21,014.00
"D"	2206194	July 20, 2023	\$69,985.77
"E"	2208792	August 15, 2023	\$30,852.36
"F"	2210805	September 7, 2023	\$129,273.86
TOTAL:			\$362,198.51

5. As detailed in the Invoices, from February 7, 2023, 2023 to September 7, 2023, Cassels' invoiced fees amounted to \$218,292.50 and Cassels incurred and invoiced for disbursements in the amount of \$5,209.34 and taxes in the amount of \$26,696.67 for a total of \$250,198.51. The invoice issued September 7, 2023, also includes a \$112,000 estimate for Cassels' costs to complete the Receivership, comprising \$100,000 in estimated fees and \$12,000 in estimated taxes, bringing the total for the Receivership to \$362,198.51.

6. The fees set out in the Invoices are calculated on the basis of the hours spent by Cassels personnel, multiplied by the applicable standard hourly rates charged by Cassels. The total time comprised in the Invoices is 375.40 hours at an average hourly rate of \$581.49 per hour ($\$218,292.50 \div 375.40$). To the best of my knowledge, information and belief, and based on discussions with the partners in Cassels' Vancouver office those hourly rates are consistent with those charged by other law firms for work of a similar nature in Vancouver, British Columbia. The additional estimated fees will be in respect of work carried out by substantially the same Cassels personnel as set out in the Invoices and, accordingly, I expect the average hourly rate to be substantially similar to the rate set out above.

7. This matter was primarily directed and carried out by the following counsel:

- (a) **Vicki Tickle.** Ms. Tickle has been member of the Cassels' insolvency group since joining the firm as a partner in 2022. Prior to joining Cassels, she was a partner at McMillan LLP and an associate at Fasken Martineau DuMoulin LLP. She was called to the bars of Queensland in 1997, England and Wales in 2005, and British Columbia in 2008. She practises primarily in commercial insolvency, including on numerous complex restructuring and receivership matters and has been listed in the Best Lawyers for insolvency and financial restructuring, the Canadian Legal Lexpert Directory for insolvency and financial restructuring, and Chambers Canada for restructuring and insolvency. Ms. Tickle is a member of the Insolvency Institute of Canada and the International Women's Insolvency & Restructuring Confederation, for which she previously served as chair of the Western Canada Network. She has also published several publications on complex restructuring matters. Attached hereto and marked as **Exhibit "G"** is a true copy of Ms. Tickle's *curriculum vitae* maintained by Cassels.
- (b) **Forrest Finn.** I joined the Cassels' insolvency group in 2020 and rejoined in 2022. Prior to rejoining the firm, I also practised in the insolvency group of McCarthy Tetrault LLP from 2021 to 2022. I was called to the bars of British Columbia in 2020, Yukon in 2022, and Ontario in 2023. My practice focuses primarily on bankruptcy proceedings, receiverships, and commercial restructurings. Attached hereto and marked as **Exhibit "H"** is a copy of my *curriculum vitae* maintained by Cassels.

8. To the best of my knowledge, information and belief, the information contained in the Invoices 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,


is true and correct in all respects.

9. I have reviewed the accounts of Cassels and do verily believe that:

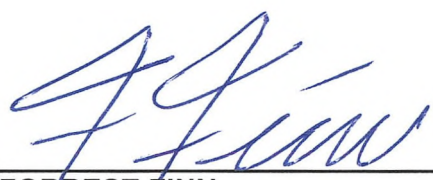
- (a) Cassels' professional fees and disbursements have been properly incurred and are fair and reasonable in the circumstances;
- (b) the work completed by Cassels was delegated to the appropriate professionals in Cassels with the appropriate seniority and appropriate hourly rates;
- (c) Cassels' fees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

10. I make this affidavit expressly for the purposes of the Receiver's application to approve its accounts and the Invoices, and for no other purpose. In particular, nothing herein is a waiver of solicitor-client privilege by the Receiver.

AFFIRMED BEFORE ME at Vancouver,)
 British Columbia, on November 20, 2023)
)
)
)
)
)
)
)



 A Commissioner for taking Affidavits in)
 and for British Columbia)
VICKI TICKLE)
Barrister & Solicitor)
Cassels Brock and Blackwell LLP)
 #2200 - 885 West Georgia Street)
 Vancouver, B.C. V6C 3E8)
 Phone: (778) 309-7954)



FORREST FINN

This is **Exhibit "A"** referred to in the
Affidavit of Forrest Finn affirmed November 20, 2023

A handwritten signature in blue ink, appearing to read "Vali Tallis". The signature is written in a cursive style with a large, stylized initial 'V'.

A Commissioner for taking Affidavits in the
Province of British Columbia

Cassels

Attn: Noah Goldstein KSV Advisory 150 King St W, Suite 2308 Toronto, ON M5H 1J9	Invoice No: 2196211 Date: March 31, 2023 Matter No.: 057984-00002 GST/HST No.: R121379572 PST No.: 1012-5078 Lawyer: Jacobs, Ryan Tel.: (416) 860-6465 E-mail: RJacobs@cassels.com
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Re: Receivership of Coromandel

Fees for professional services rendered up to and including March 31, 2023

Our Fees	77,736.00
Disbursements	2,965.14
Total Fees and Disbursements	80,701.14
GST @ 5.00%	4,002.29
PST @ 7.00%	5,603.19
TOTAL DUE (CAD)	90,306.62

We are committed to protecting the environment.

Please provide your email address to payments@cassels.com to receive invoice and reminder statements electronically.

Payment due upon receipt. Please return remittance advice(s) with cheque.

REMITTANCE ADVICE: *Email payment details to payments@cassels.com*

CAD EFT and Wire:

Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1

Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Scotia Plaza, Suite 2100, 40 King Street West
Toronto, Ontario, M5H 3C2 Canada

Online Bill Payments:

Vendor name is **Cassels Brock Blackwell LLP** and you are required to enter the first six digits of the matter #

Invoice No: 2196211
Matter No.: 057984-00002

Amount: **CAD 90,306.62**

e-Transfer Payments: payments@cassels.com

Credit Card Payments: payments.cassels.com

Cassels Brock Blackwell LLP

Suite 2100, Scotia Plaza, 40 King Street West, Toronto, ON M5H 3C2 Canada | t: 416 869 5300 | f: 416 360 8877 | cassels.com

FEE DETAIL

Date	Name	Description	Hours
Feb-07-23	V. Tickle	Emails with R. Jacobs and N. Goldstein regarding proposed appointment of KSV as receiver of Southview Gardens and Coromandel CCAA proceedings; review CCAA petition;	0.50
Feb-08-23	V. Tickle	Call with N. Goldstein regarding background to matter, proposed appointment of KSV as receiver, and related matters; review and provide comments on materials for Dentons and cover email; emails with N. Goldstein regarding same;	2.30
Feb-09-23	V. Tickle	Review 1st Affidavit of J. Landa (CCAA proceedings);	0.20
Feb-10-23	V. Tickle	Review reasons of Justice Loo from February 6 CCAA hearing;	0.20
Feb-11-23	V. Tickle	Emails with N. Goldstein and R. Jacobs regarding proposed receivership appointment;	0.20
Feb-12-23	V. Tickle	Emails with N. Goldstein regarding draft receivership order;	0.10
Feb-13-23	V. Tickle	Emails with M. Buttery (Osler) and N. Goldstein regarding draft receivership order; discussions and emails with F. Finn regarding same; review draft receivership order and draft language authorizing payment of certain pre-filing amounts; call with N. Goldstein, J. Wong and F. Finn regarding same, actions for first days of receivership, and related matters;	2.10
Feb-13-23	F. Finn	Attend call with N. Goldstein and J. Wong; strategize regarding upcoming receivership.	0.70
Feb-14-23	V. Tickle	Emails with F. Finn, M. Buttery, C. Ramsay and N. Goldstein regarding revised draft receivership order; emails with N. Goldstein regarding possible acquisition of Southview Gardens by Cenyard; review receivership petition and supporting affidavits;	0.80
Feb-15-23	V. Tickle	Emails with N. Goldstein regarding status of matter; emails and call with M. Buttery regarding same and hearing of receivership application;	0.30
Feb-16-23	F. Finn	Draft service list; multiple correspondence; strategize regarding upcoming receivership.	1.10
Feb-16-23	V. Tickle	Review 2nd affidavit of Z. Zhong; emails from N. Goldstein and M. Buttery regarding Cenyard position with respect to receivership application; appear at hearing of application for appointment of receiver; emails with N. Goldstein regarding outcome of hearing; emails with C. Brousson, M. Buttery, J. Schultz and V. Cross regarding meetings with lenders, receiver and counsel; review draft letters to debtors and property manager; emails with J. Wong and N. Goldstein regarding same; emails with A. Manasterski and N. Goldstein regarding entered Receivership Order; emails with H. Roberts and F. Finn regarding service list for receivership proceedings;	4.30
Feb-17-23	S. Fernandes	Research re procedure for registering receivership order on title; call BC Land Title Office re requirements and procedure for registering receivership order on title;	0.50

Date	Name	Description	Hours
Feb-17-23	F. Finn	Multiple correspondence; research registration of orders in British Columbia; attend call with Land Title Office; attend call with N. Goldstein and J. Wong.	2.40
Feb-17-23	V. Tickle	Emails and calls with N. Goldstein and F. Finn, and review LTSA publications, regarding BC practice with respect to registration of Receivership Order on title; emails from N. Goldstein and V. Cross regarding meeting with Cenyard and Dentons; review and provide comments on draft receivership service list; emails with F. Finn regarding same;	0.60
Feb-20-23	V. Tickle	Emails regarding meeting with Cenyard;	0.10
Feb-21-23	F. Finn	Attend meeting with Cenyard. Correspondence with V. Tickle regarding same.	1.40
Feb-21-23	V. Tickle	Prepare for and attend meeting with Cenyard and Dentons;	1.30
Feb-22-23	V. Tickle	Review standard forms used by BentallGreenOak; emails with N. Goldstein regarding same;	0.40
Feb-23-23	F. Finn	Review correspondence; review draft letters, scripts, and agreements; provide comments on same.	1.40
Feb-23-23	V. Tickle	Emails with M. Wunder and F. Finn regarding review of Cenyard security; draft acknowledgement and disclaimer for execution by new tenants; emails with N. Goldstein and J. Wong regarding same; review draft documents regarding realtor RFP; emails with N. Goldstein and J. Wong regarding same; review draft script for use by BentallGreenOak in response to tenant queries; emails with F. Finn and J. Wong regarding same;	1.50
Feb-24-23	F. Finn	Review security documents of Peakhill; draft opinion regarding same.	2.00
Feb-24-23	V. Tickle	Review F. Finn comments on talking points for BentallGreenOak; emails with F. Finn and J. Wong regarding same; email from N. Goldstein regarding meeting with BentallGreenOak; emails with F. Finn regarding review of Peakhill security and related matters; emails from J. Wong, V. Cross and N. Goldstein regarding balance owing to Cenyard;	0.40
Feb-24-23	K. Norman	Attending to property and security searches; Email correspondence and discussions with agent with respect to searches; Reviewing search results and preparing report with respect to same; Email correspondence with F. Finn;	0.70
Feb-25-23	V. Tickle	Review Colliers' revisions to draft confidentiality agreement; emails with J. Wong regarding same;	0.30
Feb-28-23	F. Finn	Review security documents of Peakhill; draft opinion regarding same.	1.20
Mar-01-23	V. Tickle	Call with and email from J-D Murray (NAI Commercial); emails with N. Goldstein and J. Wong regarding same; emails with N. Goldstein and J. Wong regarding insurance matters;	0.40
Mar-02-23	V. Tickle	Review various insurance policy documents and related correspondence; calls with R. DeCosta and J. Birch regarding	4.00

Date	Name	Description	Hours
		same, renewal obligations, and related matters; emails and call with N. Goldstein regarding same; draft letter to insurers; emails with N. Goldstein regarding same;	
Mar-02-23	F. Finn	Review security documents of Peakhill; draft opinion regarding same.	0.20
Mar-02-23	R. Da Costa	Discussion regarding insurance coverage renewal; Reviewed insurance materials;	1.00
Mar-03-23	V. Tickle	Email to M. Leukefeld forwarding letter to insurance regarding renewal; emails with N. Goldstein regarding same; email from N. Goldstein regarding financial update to Kingsett;	0.20
Mar-05-23	F. Finn	Review security documents of Peakhill; draft opinion regarding same.	3.70
Mar-06-23	P. Gill	Prepare searches summaries for Baystone Properties (2016) Ltd., Coromandel Holdings Ltd., Coromandel Properties (2016) Ltd, Junchao Mo, Zhen Yu Zhong, Southview Gardens, Southview Gardens (BT) Ltd., Southview Gardens BT Ltd., Southview Gardens Limited Partnership and Southview Gardens Properties Ltd.;	4.60
Mar-06-23	N. Pelech	Review opinion letter in respect of mortgage security;	0.90
Mar-06-23	V. Tickle	Emails with J. Wong regarding application for approval of SISP and timing for service of materials;	0.20
Mar-06-23	A. Im	Attending to corporate and security searches; Reviewing search results and preparing report with respect to same; Email correspondence with F. Finn.	1.50
Mar-06-23	F. Finn	Review security documents of Peakhill; review due diligence searches; draft opinion regarding same; review correspondence.	4.30
Mar-07-23	P. Gill	Prepare search summaries for Baystone Properties (2016) Ltd., Coromandel Holdings Ltd., Coromandel Properties (2016) Ltd, Junchao Mo, Zhen Yu Zhong, Southview Gardens, Southview Gardens (BT) Ltd., Southview Gardens BT Ltd., Southview Gardens Limited Partnership and Southview Gardens Properties Ltd.;	5.60
Mar-07-23	M. Sam	Attending to and obtaining BC PPSA search for Southview Gardens BT Ltd.; Reviewing search results and preparing report with respect to same;	0.20
Mar-07-23	A. Im	Attending to corporate and security searches; Reviewing search results and preparing report with respect to same; Email correspondence with F. Finn.	1.00
Mar-07-23	V. Tickle	Prepare and submit request to appear before Mr. Justice Loo regarding application for approval of SISP; emails from N. Goldstein and V. Cross regarding selection of realtor and Cenyard feedback; emails with N. Goldstein regarding insurance renewal and proposed report with respect to same; consider matters for report;	0.70
Mar-07-23	F. Finn	Review security documents of Peakhill; review due diligence searches; draft opinion regarding same; review	2.90

Date	Name	Description	Hours
		correspondence.	
Mar-08-23	V. Tickle	Calls with N. Goldstein, J. Wong and F. Finn regarding status of insurance renewal efforts and options with respect to same; emails with N. Goldstein, J. Wong and F. Finn regarding same, application for approval of sale process, and related matters; email from Supreme Court Scheduling regarding hearing of application for approval of sale process; draft letter to counsel to secured lenders regarding insurance renewal efforts and options; emails with N, Goldstein and J. Wong regarding same; emails from N. Goldstein and V. Cross regarding selection of realtors, Cenyard potential participation in sales process, and balance owing to Cenyard;	1.10
Mar-08-23	F. Finn	Attend call with N. Goldstein and J. Wong.	0.50
Mar-09-23	P. Gill	Create searches summaries for Junchao Mo and Zhen Yu Zhong;	1.30
Mar-09-23	V. Tickle	Review and revise draft letter to secured lenders regarding renewal insurance coverage and related matters, to reflect KSV comments; emails with N. Goldstein and J. Wong regarding same and status of insurance renewal efforts; finalize and send letter to counsel for secured lenders; emails with N. Goldstein, J. Wong and F. Finn regarding correspondence to Court; draft letter to Supreme Court Scheduling regarding request for assistance;	3.50
Mar-09-23	F. Finn	Review security documents of Peakhill; review due diligence searches; draft opinion regarding same; review correspondence.	3.10
Mar-09-23	A. Im	Reviewing balance of search results and preparing report with respect to same; Email correspondence with F. Finn.	0.90
Mar-10-23	N. Pelech	Review opinion letter in respect of mortgage security;	0.60
Mar-10-23	P. Gill	Review opinion;	1.90
Mar-10-23	V. Tickle	Emails and calls with N. Goldstein, J. Wong and F. Finn regarding correspondence to Court with respect to request for assistance in connection with insurance renewal issues, status of renewal efforts, correspondence to BFL, and related matters; finalize and send letter to Court; draft letter to BFL; emails with M. Buttery regarding correspondence to court and potential appearance before Mr. Justice Loo; email to R. Da Costa regarding correspondence from BFL and client queries with respect to same; emails with Supreme Court Scheduling regarding hearing before Mr. Justice Loo in connection with insurance renewal matters; emails with N. Goldstein and J. Wong regarding same and related matters;	4.70
Mar-10-23	F. Finn	Review security documents of Peakhill; review due diligence searches; draft opinion regarding same; review correspondence; research jurisprudence regarding discretionary receivership orders; draft materials regarding same.	3.50

Date	Name	Description	Hours
Mar-10-23	J. Birch	Email from Vicki Tickle; consider effect of receivership order on insurance policies and email Vicki Tickle	0.20
Mar-11-23	V. Tickle	Emails with N. Goldstein and F. Finn regarding proposed declaration in favour of Receiver; emails with R. Da Costa regarding call to discuss Receiver questions with respect to insurance;	1.20
Mar-11-23	F. Finn	Research jurisprudence regarding discretionary receivership orders; draft application materials regarding same.	0.20
Mar-11-23	R. Da Costa	Reviewed lengthy correspondence regarding coverages being sought for insolvency program; Drafted response in light of questions posed in respect of same; Various correspondence with V Tickle regarding coverage placement and subrogation rights;	0.60
Mar-12-23	F. Finn	Research jurisprudence regarding discretionary receivership orders; draft application materials regarding same.	2.00
Mar-13-23	F. Finn	Draft notice of application; draft orders.	0.60
Mar-13-23	P. Gill	Review and comment on opinion;	0.20
Mar-13-23	V. Tickle	Call and emails with N. Goldstein, J. Wong, F. Finn and R. Da Costa regarding insurance renewal and related matters; call with J. Schultz regarding proposed court hearing and related matters; emails with N. Goldstein regarding correspondence with Court and counsel for secured lenders; letter to Supreme Court Scheduling; email to counsel to secured lenders regarding insurance renewal; emails with N. Goldstein, R. Da Costa and J. Wong regarding insurance renewal documents;	2.70
Mar-13-23	R. Da Costa	Call with N. Goldstein, J. Wong, V. Tickle and F. Finn regarding insurance placement; Reviewed insurance offering materials; Drafted note to client outlining findings and observations related to same;	2.20
Mar-14-23	S. Towriss	Review, discuss and provide advice on listing agreement;	0.30
Mar-14-23	N. Pelech	Review draft listing agreement;	1.30
Mar-14-23	F. Finn	Draft notice of application; draft orders.	2.50
Mar-14-23	V. Tickle	Emails with R. Da Costa and J. Wong regarding replacement insurance coverage; review and provide comments on draft listing agreement with CBRE and draft 1st Report; emails with J. Wong, N. Goldstein and F. Finn regarding same; discussions with F. Finn regarding same and draft notice of application for order approving sale process and related relief; emails with N. Pelech regarding draft CBRE listing agreement and Receiver questions with respect to same; review draft security review;	4.90
Mar-14-23	R. Da Costa	Various correspondence with J. Wong; Reviewed insurance documents; Responded to J. Wong's queries in regards to same; Various correspondence with V. Tickle;	1.60
Mar-15-23	S. Fernandes	Research and summarize case law;	0.70
Mar-15-23	V. Tickle	Emails and discussions with F. Finn regarding Receiver's	7.30

Date	Name	Description	Hours
		reports and draft application materials; emails with J. Wong and N. Goldstein regarding draft reports, status of CBRE listing agreement, and related matters; review and provide comments on revised draft Receiver's reports; review and provide comments on draft application materials; emails from J. Wong and R. Da Costa regarding replacement insurance documents; continue review of draft security review and provide comments on same; email to F. Finn regarding same;	
Mar-15-23	F. Finn	Draft notice of application; draft orders; provide comments on receiver's reports.	11.10
Mar-15-23	R. Da Costa	Reviewed insurance policy documents provided by J. Wong; Considered queries posed by J. Wong in regards to same; Drafted response to same;	2.20
Mar-16-23	V. Tickle	Calls and emails with F. Finn regarding draft application materials, filing and service of same and Receiver's reports, and related matters; emails with J. Wong and N. Goldstein regarding same, draft Receiver's reports, CBRE listing agreement, and related matters;	1.50
Mar-16-23	F. Finn	Draft notice of application; draft orders; provide comments on receiver's reports; organize filing and service of same.	4.00
Mar-17-23	F. Finn	Update draft service list; multiple correspondence.	0.50
Mar-18-23	F. Finn	Correspond with counsel to Ceynard.	0.10
Mar-21-23	F. Finn	Prepare application materials and organize filing of same; organize service of application record index.	1.10
Mar-21-23	V. Tickle	Emails from V. Cross and F. Finn regarding insurance certificates and requested changes thereto;	0.10
Mar-22-23	F. Finn	Multiple correspondence; prepare materials for court hearing; prepare for hearing.	2.70
Mar-22-23	V. Tickle	Emails with J. Wong and N. Goldstein, and discussions with F. Finn, regarding proposed confidentiality agreement for data room access; review and provide comments on same; emails and discussions with F. Finn regarding position of Woodbourne regarding application for approval of sale process; prepare submissions for hearing of application; various emails and discussions with F. Finn regarding hearing of application;	3.50
Mar-22-23	R. Da Costa	Reviewed correspondence from J. Wong containing questions regarding insurance certificate requirements; Worked to address same; Correspondence providing findings on same;	0.90
Mar-23-23	F. Finn	Prepare for hearing; attend hearing; attend to registry matters and service regarding orders; multiple correspondence; review due diligence searches; draft security opinion regarding same.	5.50
Mar-23-23	V. Tickle	Prepare for and attend hearing of application for approval of sale process and Receiver's activities, and certain related relief; discussions with F. Finn, and emails with J. Wong and	3.40

Date	Name	Description	Hours
		N. Goldstein regarding outcome of hearing, redactions to confidential supplement to Receiver's first report, revised form of sealing order, and related matters; revise form of sealing order and attend at court for signing of same; emails with C. Brousson regarding Woodbourne position on Receiver's application and outcome of same;	
Mar-24-23	F. Finn	Review due diligence searches; draft security opinion regarding same.	1.10
Mar-27-23	V. Tickle	Emails from R. Da Costa and F. Finn regarding Cenyard request for specific language in insurance certificate;	0.10
Mar-27-23	R. Da Costa	Reviewed correspondence from Dentons regarding insurance certificates; Considered query regarding same; Prepared correspondence to F. Finn regarding findings of same;	0.30
Mar-28-23	F. Finn	Draft security opinion; correspond with J. Wong and N. Goldstein.	0.30
Mar-28-23	V. Tickle	Review revised draft security review letter; emails and discussion with F. Finn regarding same; emails with N. Goldstein regarding same;	0.30

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Tickle, Vicki	Partner	55.40	735.00	40,719.00
Towriss, Shauna	Partner	0.30	640.00	192.00
Da Costa, Richard	Partner	8.80	715.00	6,292.00
Birch, John N.	Partner	0.20	990.00	198.00
Fernandes, Stephanie	Associate	1.20	420.00	504.00
Pelech, Nathan	Associate	2.80	395.00	1,106.00
Finn, Forrest	Associate	60.10	415.00	24,941.50
Sam, Maggie	Law Clerk / Paralegal	0.20	240.00	48.00
Im, Anita	Law Clerk / Paralegal	3.40	240.00	816.00
Norman, Krystina	Law Clerk / Paralegal	0.70	285.00	199.50
Gill, Priya	Law Student	13.60	200.00	2,720.00
Total (CAD)		146.70		77,736.00

Our Fees	77,736.00
GST @ 5.00%	3,886.80
PST @ 7.00%	5,441.51
TOTAL FEES & TAXES (CAD)	87,064.31

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

Electronic Due Diligence	277.57
Certificate of Status	106.00
Litigation Search	180.00
Agency Fees and Disbursements	11.91
Court - Filing Executions	80.00
Total Non-Taxable Disbursements	<u>655.48</u>

Taxable Disbursements

Copies	371.50
Electronic Due Diligence	1,047.00
Litigation Search	420.00
Certificate of Status	64.00
Insolvency/Bankruptcy Search	75.00
West Law - Online Searches	227.25
Agency Fees and Disbursements	57.00
Travel	12.31
Meals	35.60
Total Taxable Disbursements	<u>2,309.66</u>
GST @ 5.00%	115.49
PST @ 7.00%	161.68
Total Taxable Disbursements & Taxes	<u>2,586.83</u>

TOTAL DISBURSEMENTS & TAXES (CAD) 3,242.31

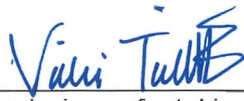
TOTAL FEES 77,736.00

TOTAL DISBURSEMENTS 2,965.14

TOTAL TAXES 9,605.48

TOTAL FEES, DISBURSEMENTS & TAXES (CAD) 90,306.62

This is **Exhibit "B"** referred to in the
Affidavit of Forrest Finn affirmed November 20, 2023

A handwritten signature in blue ink that reads "Vali Tuohi". The signature is written in a cursive style with a distinct loop at the end of the last name.

A Commissioner for taking Affidavits in the
Province of British Columbia

Cassels

Attn: Noah Goldstein
KSV Advisory
150 King St W, Suite 2308
Toronto, ON M5H 1J9

Invoice No: 2199946
Date: May 11, 2023
Matter No.: 057984-00002
GST/HST No.: R121379572
PST No.: 1012-5078

Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Receivership of Coromandel

Fees for professional services rendered up to and including April 30, 2023

Our Fees	18,524.00
Disbursements	18.00
Total Fees and Disbursements	18,542.00
GST @ 5.00%	926.20
PST @ 7.00%	1,296.68
TOTAL DUE (CAD)	20,764.88

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Toronto, ON, M5H 1H1

Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Scotia Plaza, Suite 2100, 40 King Street West
Toronto, Ontario, M5H 3C2 Canada

Online Bill Payments:

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Invoice No: 2199946
Matter No.: 057984-00002

Amount: **CAD 20,764.88**

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Cassels Brock Blackwell LLP

Suite 2100, Scotia Plaza, 40 King Street West, Toronto, ON M5H 3C2 Canada | t: 416 869 5300 | f: 416 360 8877 | cassels.com

FEE DETAIL

Date	Name	Description	Hours
Apr-04-23	V. Tickle	Emails with J. Wong, N. Goldstein and F. Finn regarding draft purchase and sale agreement and related matters; discussions with F. Finn regarding same;	0.20
Apr-04-23	F. Finn	Draft form of agreement for purchase and sale.	0.20
Apr-04-23	N. Pelech	Discuss and review precedent APS;	0.40
Apr-05-23	F. Finn	Draft form of agreement for purchase and sale.	11.10
Apr-06-23	V. Tickle	Review draft purchase and sale agreement; emails and discussions with F. Finn regarding same;	2.00
Apr-06-23	F. Finn	Draft form of agreement for purchase and sale.	0.50
Apr-07-23	V. Tickle	Review and revise draft purchase and sale agreement; email to F. Finn regarding same;	3.10
Apr-08-23	F. Finn	Draft agreement for purchase and sale.	0.50
Apr-09-23	F. Finn	Draft agreement for purchase and sale.	6.30
Apr-10-23	V. Tickle	Review and provide comments on revised draft agreement of purchase and sale; emails and call with S. Towriss and emails with F. Finn regarding same;	2.30
Apr-10-23	S. Towriss	Review query regarding adjustments in PSA; internal discussion and advice regarding same;	0.20
Apr-10-23	F. Finn	Draft agreement for purchase and sale.	1.40
Apr-11-23	S. Towriss	Review and consider further wording/provision on adjustments; internal advice regarding same;	0.20
Apr-11-23	F. Finn	Draft agreement for purchase and sale.	0.40
Apr-11-23	V. Tickle	Review and provide comments regarding revised draft agreement of purchase and sale; emails with F. Finn and S. Towriss regarding same;	1.20
Apr-12-23	V. Tickle	Review comments from client on draft purchase and sale agreement; emails with F. Finn regarding same;	0.30
Apr-12-23	F. Finn	Draft form of purchase and sale agreement.	0.20
Apr-13-23	V. Tickle	Review and revise draft PSA to reflect client comments;	1.20
Apr-14-23	V. Tickle	Emails with J. Wong and F. Finn regarding draft PSA; review and revise draft PSA;	0.70
Apr-14-23	F. Finn	Draft form of purchase and sale agreement.	0.20
Apr-16-23	V. Tickle	Consider KSV comments on draft PSA and revise same;	0.50
Apr-17-23	V. Tickle	Revise draft form of purchase and sale agreement; emails with F. Finn regarding case law with respect to applicable appeal period in BIA receivership proceedings; emails with J. Wong regarding draft form of purchase and sale agreement and related matters;	1.00
Apr-17-23	F. Finn	Research regarding appeal period in receiverships.	0.70

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Tickle, Vicki	Partner	12.50	735.00	9,187.50
Towriss, Shauna	Partner	0.40	640.00	256.00
Finn, Forrest	Associate	21.50	415.00	8,922.50
Pelech, Nathan	Associate	0.40	395.00	158.00
Total (CAD)		34.80		18,524.00

Our Fees	18,524.00	
GST @ 5.00%	926.20	
PST @ 7.00%	1,296.68	
TOTAL FEES & TAXES (CAD)		20,746.88

DISBURSEMENT SUMMARY


Non-Taxable Disbursements

BC Online - Other	18.00
Total Non-Taxable Disbursements	18.00

TOTAL DISBURSEMENTS & TAXES (CAD) 18.00

TOTAL FEES	18,524.00
TOTAL DISBURSEMENTS	18.00
TOTAL TAXES	2,222.88
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	20,764.88

This is **Exhibit "C"** referred to in the
Affidavit of Forrest Finn affirmed November 20, 2023

A handwritten signature in blue ink, appearing to read "Vaini Tallis". The signature is written in a cursive style with a small dash above the 'i' in "Vaini".

A Commissioner for taking Affidavits in the
Province of British Columbia

Cassels

Attn: Noah Goldstein
KSV Advisory
150 King St W, Suite 2308
Toronto, ON M5H 1J9

Invoice No: 2204474
Date: June 29, 2023
Matter No.: 057984-00002
GST/HST No.: R121379572
PST No.: 1012-5078

Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Receivership of Coromandel

Fees for professional services rendered up to and including May 31, 2023

Our Fees	18,762.50
GST @ 5.00%	938.13
PST @ 7.00%	1,313.37
TOTAL DUE (CAD)	21,014.00

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CAD EFT and Wire:

Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1

Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

Online Bill Payments:

Vendor name is **Cassels Brock Blackwell LLP** and you are required to enter the first six digits of the matter #

Invoice No: 2204474
Matter No.: 057984-00002

Amount: **CAD 21,014.00**

e-Transfer Payments: payments@cassels.com

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Cassels Brock Blackwell LLP | cassels.com

Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL

Date	Name	Description	Hours
May-03-23	V. Tickle	Emails with W. Roberts regarding sale process and potential bid;	0.10
May-04-23	V. Tickle	Discussion with C. Brousson regarding Woodbourne action against guarantors and status of sale process; emails with J. Wong regarding same, review of Cenyard security, and related matters;	0.30
May-05-23	V. Tickle	Emails with J. Wong and F. Finn regarding Cenyard loan and security documents and security review;	0.20
May-09-23	V. Tickle	Emails with W. Roberts and N. Goldstein regarding call to discuss potential offer;	0.10
May-11-23	R. Jacobs	Emails and strategy call with N. Goldstein regarding bids and RVO issues. Consider same and examine recent decisions.	1.00
May-11-23	V. Tickle	Call with N. Goldstein, J. Wong and W. Roberts regarding sale process and possible RVO;	0.30
May-12-23	V. Tickle	Email from W. Roberts regarding shareholder of nominee and scope of receivership appointment;	0.10
May-15-23	V. Tickle	Emails with N. Goldstein, J. Wong and W. Roberts regarding owner of lands, assets over which Receiver appointed, and related matters; review affidavit material regarding same; emails with K. Mak regarding CCAA affidavit; emails with N. Goldstein regarding BC practice with respect to sale process;	0.70
May-16-23	V. Tickle	Email from J. Wong regarding Peakhill payout figure;	0.10
May-19-23	V. Tickle	Emails with N. Goldstein, R. Jacobs and J. Wong regarding offers received, 140 offer, and related matters;	0.30
May-20-23	V. Tickle	Review draft 140 offer/draft APS; emails with J. Wong regarding same;	1.70
May-21-23	R. Jacobs	Review bids and email correspondence with KSV and V. Tickle regarding same.	1.20
May-21-23	V. Tickle	Emails from J. Wong regarding comments on 140 APS mark up, proposed RVO structure, and corporate search with respect to proposed purchaser; email to H. Roberts regarding corporate search; emails with R. Jacobs re bids;	0.20
May-22-23	R. Jacobs	Email correspondence with KSV and Cassels teams regarding terms of bids and advice on issues regarding same.	0.50
May-23-23	R. Jacobs	Review bids and correspondence with KSV and N. Tickle regarding same. Advise regarding RVOs.	1.00
May-23-23	A. Im	Receiving and reviewing instructions; Attending to corporate searches; Reviewing search results and preparing report with respect to same; Email correspondence with A. Hayman.	0.30
May-23-23	V. Tickle	Emails with H. Roberts and J. Wong regarding corporate search of potential purchaser; call and emails with N. Goldstein, R. Jacobs and J. Wong regarding 140 offer/PSA mark up, discussion with Lawson Lundell with respect to	2.40

Date	Name	Description	Hours
		same, and related matters; email from F. Finn regarding case law with respect to RVOs; emails and call with W. Roberts and J Yong regarding KSV comments on 140 PSA mark up;	
May-23-23	F. Finn	Review security documents; draft security opinion regarding same;	0.50
May-24-23	V. Tickle	Emails with N. Goldstein and R. Jacobs regarding proposed RVO structure; call and emails with N. Goldstein and J. Wong regarding regarding 140 offer and discussions with Lawson Lundell regarding same; emails with W. Roberts and J. Yong regarding call to discuss 140 offer;	1.20
May-24-23	F. Finn	Review security documents; draft security opinion regarding same;	0.50
May-25-23	V. Tickle	Prepare for and attend call with W. Roberts and J. Wong regarding 140 PSA mark up and related matters; call with email to S. Towriss regarding closing mechanism in 140 PSA mark up; emails with N. Goldstein and J. Wong regarding discussion with Lawson Lundell; revise draft 140 PSA mark up to reflect client comments;	2.50
May-25-23	S. Towriss	Discussion and advice regarding closing procedures, flow of funds, undertakings;	0.20
May-26-23	V. Tickle	Finalize review of PSA agreement; email to N. Goldstein and J. Wong regarding mark up of PSA and related matters; emails with S. Towriss regarding closing mechanism provisions and related matters;	0.60
May-26-23	S. Towriss	Review proposed language regarding flow of funds, solicitors' undertakings, registration of new mortgage; discussions and advice to client in respect of same;	0.40
May-28-23	V. Tickle	Emails with N. Goldstein regarding revised draft PSA and promissory note;	0.10
May-29-23	V. Tickle	Review and revise draft PSA agreement with 1400854 BC Ltd.; emails with N. Goldstein regarding same; email to W. Roberts and J. Yong regarding same;	1.20
May-29-23	F. Finn	Review security documents; draft security opinion regarding same;	5.10
May-30-23	V. Tickle	Emails with W. Roberts and N. Goldstein, and call with N. Goldstein, regarding 140 offer and related matters;	0.20
May-30-23	F. Finn	Review security documents; draft security opinion regarding same;	2.50
May-31-23	V. Tickle	Emails with N. Goldstein, R. Jacobs and W. Roberts regarding 140 offer and related matters;	0.20

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Tickle, Vicki	Partner	12.50	735.00	9,187.50

Name	Title	Hours	Rate	Amount
Jacobs, Ryan	Partner	3.70	1,500.00	5,550.00
Towriss, Shauna	Partner	0.60	640.00	384.00
Finn, Forrest	Associate	8.60	415.00	3,569.00
Im, Anita	Law Clerk / Paralegal	0.30	240.00	72.00
Total (CAD)		25.70		18,762.50

Our Fees	18,762.50	
GST @ 5.00%	938.13	
PST @ 7.00%	1,313.37	
TOTAL FEES & TAXES (CAD)		21,014.00

TOTAL FEES	18,762.50
TOTAL TAXES	2,251.50
TOTAL FEES & TAXES (CAD)	21,014.00

This is **Exhibit "D"** referred to in the
Affidavit of Forrest Finn affirmed November 20, 2023

-


A Commissioner for taking Affidavits in the
Province of British Columbia

Cassels

Attn: Noah Goldstein
KSV Advisory
150 King St W, Suite 2308
Toronto, ON M5H 1J9

Invoice No: 2206194
Date: July 20, 2023
Matter No.: 057984-00002
GST/HST No.: R121379572
PST No.: 1012-5078

Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Receivership of Coromandel

Fees for professional services rendered up to and including June 30, 2023

Our Fees	61,250.00
Disbursements	1,275.45
Total Fees and Disbursements	62,525.45
GST @ 5.00%	3,108.47
PST @ 7.00%	4,351.85
TOTAL DUE (CAD)	69,985.77

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Account No.: 0073911
Swift Code: NOSCCATT
ABA No.: 026002532

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Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

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Invoice No: 2206194
Matter No.: 057984-00002
Amount: **CAD 69,985.77**

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Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL

Date	Name	Description	Hours
Jun-01-23	V. Tickle	Emails with W. Roberts regarding Port Capital RVO and 140 offer; review reasons for judgment of Justice Fitzpatrick regarding same; email to N. Goldstein, J. Wong and R. Jacobs, and call with N. Goldstein, regarding same;	0.80
Jun-02-23	V. Tickle	Call with N. Goldstein, J. Wong, D. Pollack, C. Brousson and M. Buttery regarding offer from 114 and related matters;	0.60
Jun-05-23	V. Tickle	Review and provide comments on draft agreements of purchase and sale (RVO option and AVO option) and side letter; emails with N. Goldstein, J. Wong, M. Buttery, and W. Roberts regarding same; emails with C. Brousson and J. Wong regarding purchase price and status of Woodbourne debt;	2.50
Jun-06-23	V. Tickle	Emails with N. Goldstein regarding draft forms of agreements of purchase and sale, and related matters; emails and call with A. Teasdale and J. Yong regarding same; review and revise draft forms of agreements of purchase and sale to reflect client comments; emails with S. Towriss regarding draft forms of agreements of purchase and sale; draft form of AVO for asset sale; emails with J. Wong and C. Brousson regarding status of Woodbourne claim under proposed transactions;	3.60
Jun-06-23	S. Towriss	Review forms of purchase agreement and consider in particular the RVO/share sale concept; prepare comments and advice in respect of same; prepare email memo for further review and handling in respect of same and setting out minor revisions/drafting considerations;	1.00
Jun-06-23	R. Jacobs	Review draft offer and correspondence with V. Tickle and N. Goldstein regarding RVO issues.	0.80
Jun-07-23	V. Tickle	Emails and discussions with S. Towriss regarding draft agreements of purchase and sale and related matters; emails with N. Goldstein and J. Yong regarding same; revise draft agreements of purchase and sale; emails with F. Finn regarding form of receiver's certificate;	1.10
Jun-07-23	S. Towriss	Discussion and further advice regarding comments to Purchase and Sale Agreement; provide GST registrant language;	0.40
Jun-07-23	F. Finn	Draft notice of application regarding approval of transaction;	0.40
Jun-08-23	V. Tickle	Revise draft PSAs to reflect additional representations of Purchaser; emails with S. Towriss regarding same; finalize draft form of AVO for 'non-RVO' PSA; review and provide comments on draft forms of orders for RVO transaction structure; review Lawson Lundell amendments to draft PSAs; emails with N. Goldstein and A. Teasdale regarding same and related matters; email to F. Finn regarding sale approval application materials;	6.80
Jun-09-23	V. Tickle	Emails and call with N. Goldstein and J. Wong regarding	2.00

Date	Name	Description	Hours
		draft agreements of purchase and sale and forms of order, and related matters; review and update schedules to agreements of purchase and sale; review land title search; emails with A. Teasdale and J. Yong regarding updated draft agreements of purchase and sale, forms of orders for RVO transaction, deposit, and related matters;	
Jun-09-23	L. Casburn	Discussion with F. Finn re notice of application factual basis and legal principles; Draft Notice of Application;	0.90
Jun-09-23	B. Patton	Review correspondence; obtain LTO search; conduct Assessment Search;	0.20
Jun-09-23	F. Finn	Draft notice of application regarding approval of transaction;	0.60
Jun-11-23	V. Tickle	Review revised draft forms of order for RVO transaction structure; emails with N. Goldstein, J. Wong and A. Teasdale regarding same;	0.80
Jun-12-23	V. Tickle	Emails with A. Teasdale, R. Jacobs, J. Dietrich, N. Goldstein and J. Wong regarding draft form of RVO and related matters; emails with Z. Nurmohamed and S. Towriss regarding tax matters with respect to proposed transactions; emails with J. Dietrich, N. Goldstein and A. Teasdale regarding Residual Co., release provisions with respect to nominee director, and related matters; revise draft form of RVO; revise draft letter agreement with respect to 'dual path'; emails with R. Jacobs and N. Goldstein regarding letter agreement; emails with A. Teasdale regarding same, updated APS schedules and updated form of RVO;	4.50
Jun-12-23	S. Towriss	Discussion and advice regarding property transfer tax, nominee structure, transfer of beneficial interest, typical BC real estate purchase and sale structures;	0.30
Jun-12-23	R. Jacobs	Review and comment on draft AVO, and correspondence with V. Tickle and N. Goldstein regarding same. Comment on draft side letter regarding primary and secondary offers. Call with N. Goldstein regarding strategy.	1.70
Jun-12-23	F. Finn	Draft notice of application regarding approval of transaction;	1.00
Jun-12-23	J. Dietrich	Review of draft RVO and comment on same; exchange of email regarding RVO provisions and issues;	0.90
Jun-12-23	L. Casburn	Review supporting documents for Notice of Application; Draft Notice of Application; Discuss SISP and RVO with F. Finn re Notice of Application;	6.40
Jun-13-23	L. Casburn	Review draft Notice of Application;	1.30
Jun-13-23	F. Finn	Draft notice of application regarding approval of transaction; prepare execution copies of transaction documents;	1.30
Jun-13-23	V. Tickle	Update agreements of purchase and sale and forms of orders to reflect new purchaser name; emails with N. Goldstein and Lawson Lundell regarding final forms of	1.90

Date	Name	Description	Hours
		documents; review updated forms of order regarding RVO transaction; emails and call with A. Teasdale regarding letter agreement regarding dual process; emails with N. Goldstein regarding same; emails with F. Finn regarding execution forms of agreements of purchase and sale; prepare and submit request to appear before Mr. Justice Loo;	
Jun-14-23	F. Finn	Research regarding reverse vesting orders; draft notice of application; review security agreements and draft opinion regarding same;	3.30
Jun-14-23	J. Enns	Discussions with V. Tickle re: executed agreements; compile executed agreements and email to V. Tickle re: same;	0.90
Jun-14-23	V. Tickle	Call with N. Goldstein, and emails with N. Goldstein, L Quintos, A. Teasdale and J. Yong regarding execution of PSAs, quantum of cash consideration payable, and related matters; emails with Supreme Court Scheduling, C. Brousson, M. Buttery, A. Manasterski, A. Teasdale and N. Goldstein regarding date for hearing of application for approval of sale;	1.20
Jun-15-23	F. Finn	Research regarding reverse vesting orders; draft notice of application;	2.40
Jun-15-23	V. Tickle	Emails with J. Yong regarding final versions of agreements of purchase and sale; emails from J. Yong and J. Wong regarding deposit;	0.20
Jun-16-23	F. Finn	Research regarding reverse vesting orders; draft notice of application;	1.10
Jun-19-23	L. Casburn	Research re RVO structures; Research re tax attributes in relation to granting RVO's; Emails to F. Finn re research results for RVO's and tax attributes in these matters;	4.10
Jun-19-23	F. Finn	Research regarding reverse vesting orders; draft notice of application; review security agreements and draft opinion regarding same;	3.20
Jun-19-23	V. Tickle	Emails with N. Goldstein regarding application for approval of sale and call to discuss same;	0.10
Jun-20-23	F. Finn	Research regarding reverse vesting orders; draft notice of application; review security agreements and draft opinion regarding same;	4.00
Jun-20-23	V. Tickle	Call with N. Goldstein and J. Wong regarding court materials for application for approval of sale and related relief; discussion with F. Finn regarding same and related matters;	0.50
Jun-21-23	N. Pelech	Discuss real estate issues;	0.20
Jun-21-23	F. Finn	Research regarding reverse vesting orders; draft notice of application; review security agreements and draft opinion regarding same;	2.80
Jun-22-23	F. Finn	Research regarding reverse vesting orders; draft notice of application; review security agreements and draft opinion regarding same;	3.10

Date	Name	Description	Hours
Jun-22-23	V. Tickle	Emails with N. Goldstein regarding attendance at sale approval application hearing; email to F. Finn regarding contract counterparties and sale approval application;	0.30
Jun-23-23	L. Casburn	Review Notice of Application; Emails to F. Finn;	2.80
Jun-23-23	F. Finn	Draft notice of application; review security agreements and draft opinion regarding same;	1.30
Jun-26-23	W. Trinh	Obtain corporate and security searches for Southview Gardens BT Ltd.; prepare report with respect to same; email to F. Finn;	0.60
Jun-26-23	F. Finn	Research regarding reverse vesting orders; draft notice of application; review security agreements and draft opinion regarding same; draft letter to tenants; multiple correspondence;	5.30
Jun-26-23	V. Tickle	Review and provide comments on draft Cenyard security review; emails and discussions with F. Finn regarding same and related matters; emails with N. Goldstein regarding draft Receiver's report and related matters; email to F. Finn regarding same;	2.20
Jun-27-23	W. Trinh	Review corporate and security searches for Southview Gardens BT Ltd.; prepare report with respect to same; email to F. Finn;	0.10
Jun-27-23	B. Patton	Review correspondence; obtain title search;	0.10
Jun-27-23	F. Finn	Draft notice of application; review security agreements and draft opinion regarding same;	2.10
Jun-27-23	V. Tickle	Review and provide comments on draft receiver's 2nd report; emails with N. Goldstein regarding same; discussions with F. Finn regarding sale approval application;	3.00
Jun-28-23	V. Tickle	Review and provide comments on updated Cenyard security review; review and provide comments on draft application for approval of sale; emails and discussions with F. Finn and emails regarding same, service of application materials on contract counterparties, notice to tenants, and related matters; emails with R. Jacobs and N. Goldstein regarding draft 2nd Receiver's Report, Cenyard security review and application; emails with J. Wong regarding service of materials;	4.70
Jun-28-23	B. Patton	Review correspondence;	0.10
Jun-28-23	R. Jacobs	Review draft report and revisions to same. Correspondence with KSV team and V. Tickle regarding same.	1.00
Jun-28-23	F. Finn	Research regarding reverse vesting orders; draft notice of application; review security agreements and draft opinion regarding same;	5.10
Jun-29-23	C. Nicholson-Clarke	Attending to corporate searches; Reviewing search results and preparing report with respect to same; Email correspondence with F. Finn;	0.60
Jun-29-23	V. Tickle	Review and provide comments on revised draft 2nd Report of the Receiver and confidential supplement, draft notice of	3.30

Date	Name	Description	Hours
		application, draft notice to tenants, and related matters; emails with N. Goldstein, J. Wong and F. Finn regarding same;	
Jun-29-23	F. Finn	Draft notice of application; review security agreements and draft opinion regarding same; organize service of application materials; draft multiple letters; multiple correspondence;	8.60
Jun-29-23	R. Jacobs	Review confidential report and email correspondence with N. Goldstein and V. Tickle regarding same.	0.80
Jun-29-23	B. Patton	Review correspondence; obtain tax search;	0.20
Jun-30-23	J. Zhao	Attend court to file notice of application;	0.80
Jun-30-23	F. Finn	Draft order regarding distribution; organize filing and service of materials;	2.30

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Tickle, Vicki	Partner	40.10	735.00	29,473.50
Jacobs, Ryan	Partner	4.30	1,500.00	6,450.00
Enns, Jared	Partner	0.90	545.00	490.50
Towriss, Shauna	Partner	1.70	640.00	1,088.00
Dietrich, Jane	Partner	0.90	945.00	850.50
Pelech, Nathan	Associate	0.20	395.00	79.00
Finn, Forrest	Associate	47.90	415.00	19,878.50
Trinh, Wendy	Law Clerk / Paralegal	0.70	275.00	192.50
Patton, Brandi	Law Clerk / Paralegal	0.60	360.00	216.00
Nicholson-Clarke, Cassidy	Law Clerk / Paralegal	0.60	280.00	168.00
Casburn, Luke	Law Student	15.50	145.00	2,247.50
Zhao, Jackie	Law Student	0.80	145.00	116.00
Total (CAD)		114.20		61,250.00

Our Fees	61,250.00	
GST @ 5.00%	3,062.50	
PST @ 7.00%	4,287.49	
TOTAL FEES & TAXES (CAD)		68,599.99

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

Litigation Search	36.00
Electronic Due Diligence	116.53
Certificate of Status	53.00
BC Land & Title - Searches, Certification	70.57
NT Filing Fees	80.00
Total Non-Taxable Disbursements	356.10

Taxable Disbursements

Copies	61.50
Litigation Search	180.00
Electronic Due Diligence	438.00
Certificate of Status	32.00
Insolvency/Bankruptcy Search	45.00
BC Land & Title - Searches, Certification	44.60
West Law - Online Searches	118.25
Total Taxable Disbursements	919.35
GST @ 5.00%	45.97
PST @ 7.00%	64.36
Total Taxable Disbursements & Taxes	1,029.68

TOTAL DISBURSEMENTS & TAXES (CAD) 1,385.78

TOTAL FEES 61,250.00

TOTAL DISBURSEMENTS 1,275.45

TOTAL TAXES 7,460.32

TOTAL FEES, DISBURSEMENTS & TAXES (CAD) 69,985.77

OUTSTANDING INVOICES

Invoice Number	Invoice Date	Bill Amount	Payments / Credits	Balance Due
2204474	06/29/23	21,014.00	0.00	21,014.00
2206194	07/20/23	69,985.77	0.00	69,985.77
Total (CAD)		90,999.77	0.00	90,999.77

This is **Exhibit "E"** referred to in the
Affidavit of Forrest Finn affirmed November 20, 2023

A handwritten signature in blue ink, appearing to read "Vali Tull". The signature is written in a cursive style with a horizontal line through the middle of the letters.

A Commissioner for taking Affidavits in the
Province of British Columbia

Cassels

Attn: Noah Goldstein
KSV Advisory
150 King St W, Suite 2308
Toronto, ON M5H 1J9

Invoice No: 2208792
Date: August 15, 2023
Matter No.: 057984-00002
GST/HST No.: R121379572
PST No.: 1012-5078

Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Receivership of Southview Gardens BT LTD., Southview Gardens Limited Partnership, and Southview Gardens Properties Ltd.

Fees for professional services rendered up to and including July 31, 2023

Our Fees	26,675.50
Disbursements	871.25
Total Fees and Disbursements	27,546.75
GST @ 5.00%	1,377.35
PST @ 7.00%	1,928.26
TOTAL DUE (CAD)	30,852.36

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REMITTANCE ADVICE: *Email payment details to payments@cassels.com*

CAD EFT and Wire:

Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1

Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

Online Bill Payments:

Vendor name is **Cassels Brock Blackwell LLP** and you are required to enter the first six digits of the matter #

Invoice No: 2208792
Matter No.: 057984-00002

Amount: **CAD 30,852.36**

e-Transfer Payments: payments@cassels.com

Credit Card Payments: payments.cassels.com

Cassels Brock Blackwell LLP | cassels.com

Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL

Date	Name	Description	Hours
Jul-04-23	V. Tickle	Email from J. Schultz regarding service of application for approval and vesting order; confer with F. Finn regarding same;	0.10
Jul-04-23	R. Jacobs	Emails with Cassels team regarding service of motion record and strategy for hearing.	0.50
Jul-04-23	J. Zhao	Attend Court to file report;	0.50
Jul-05-23	V. Tickle	Call with A. Welch and J. Enns regarding proposed RVO transaction and Province's position with respect to same; discussion with F. Finn regarding same; emails from J. Schultz and F. Finn regarding service of materials on Province; email from F. Finn regarding call with contract counterparty;	0.60
Jul-05-23	R. Jacobs	Emails with KSV and V. Tickle regarding strategy on hearing dates and service. Consider same.	0.50
Jul-06-23	V. Tickle	Emails with N. Goldstein, R. Jacobs, and counsel for other interested parties regarding hearing of application for approval of sale; emails with Supreme Court Scheduling regarding adjournment of July 11 hearing;	1.10
Jul-07-23	V. Tickle	Emails with N. Goldstein, J. Schultz, A. Welch, Supreme Court Scheduling, C. Brousson, and R. Jacobs regarding sale approval application, and related matters;	0.70
Jul-10-23	R. Jacobs	Email correspondence with V. Tickle and N. Goldstein regarding strategy on BC AG objection and hearing timing. Review and comment on draft communication to counsel regarding same.	1.10
Jul-10-23	V. Tickle	Email to service list regarding rescheduled hearing of application for approval of sale; emails with Supreme Court Scheduling and other counsel regarding hearing of sale approval application, and related matters; emails with N. Goldstein and R. Jacobs regarding same; instructions to H. Roberts regarding requisition to reschedule hearing; prepare index to application record, and instructions to H. Roberts regarding same; emails with S. Fernandes regarding authorities in support of Receiver's application;	2.40
Jul-10-23	S. Fernandes	Review Orders referenced in Application Record;	0.40
Jul-11-23	V. Tickle	Finalize forms of order for inclusion in application record; instructions to H. Roberts regarding same; emails with Supreme Court Scheduling regarding requisition to reschedule hearing; emails with A. Welch, C. Brousson, and N. Goldstein regarding Province position with respect to sale approval application and related matters; email from M. Buttery regarding hearing of sale approval application;	2.20
Jul-11-23	R. Jacobs	Strategy correspondence with V. Tickle and N. Goldstein regarding BC AG position and next steps.	0.90
Jul-12-23	V. Tickle	Emails with various counsel regarding sale approval	6.10

Date	Name	Description	Hours
		application, July 13 hearing, arrangements for hearing of submissions with respect to RVO, and related matters; call with O. James and A. Welch regarding matters for hearing; call with C. Brousson regarding same; emails with N. Goldstein and R. Jacobs regarding same; prepare submissions and materials for hearing of sale approval application;	
Jul-12-23	R. Jacobs	Email correspondence with N. Goldstein and V. Tickle regarding hearing prep and positions.	1.00
Jul-13-23	V. Tickle	Prepare for and appear on hearing before Mr. Justice Loo; call with N. Goldstein regarding outcome of same; emails from W. Roberts, O. James and J. Schultz regarding dates for exchange of materials with respect to RVO transaction;	3.60
Jul-13-23	R. Jacobs	Email correspondence with N. Goldstein and V. Tickle regarding hearing results and next steps.	0.50
Jul-14-23	V. Tickle	Draft revised form of approval and vesting order, and forms of amendments to agreements of purchase and sale; emails with N. Goldstein and W. Roberts regarding same;	3.20
Jul-17-23	V. Tickle	Revise draft non-RVO approval and vesting order and amendments to APSs to reflect KSV comments; emails with N. Goldstein regarding same; emails with C. Brousson, W. Roberts, O. James and J. Schultz regarding same;	0.80
Jul-18-23	V. Tickle	Review Purchaser comments on draft form of approval and vesting order and amendments to agreements of purchase and sale; emails with A. Teasdale, N. Goldstein, C. Brousson and O. James regarding same;	0.60
Jul-19-23	V. Tickle	Review and revise draft approval and vesting order and amendments to agreements of purchase and sale; emails with N. Goldstein, A. Teasdale, C. Brousson, O. James and J. Schultz regarding same;	1.10
Jul-20-23	V. Tickle	Emails with E. Newbery, O. James and A. Teasdale regarding materials for August 4 hearing; review affidavit of D. Venance; email to N. Goldstein regarding same; emails with O. James, E. Laskin and A. Teasdale regarding form of 'non-RVO' approval and vesting order and amending agreements;	0.40
Jul-21-23	V. Tickle	Email from A. Teasdale regarding approval and vesting order and amendments to agreements of purchase and sale;	0.10
Jul-24-23	V. Tickle	Emails with A. Teasdale regarding Purchaser sign off on July 13 AVO and amending agreement; email from E. Newbury attaching sworn affidavit of D. Venance;	0.10
Jul-25-23	V. Tickle	Review and revise final form of approval and vesting order; emails with A. Teasdale regarding same; review written submissions of Cenyard and purchaser regarding reverse vesting order;	1.40
Jul-26-23	V. Tickle	Email to N. Goldstein regarding final versions of AVO and Amendments to APSs;	0.60

Date	Name	Description	Hours
Jul-27-23	V. Tickle	Finalize execution versions of amendments to agreements of purchase and sale; emails with N. Goldstein and A. Teasdale regarding same and form of July 13 approval and vesting order; email to counsel regarding form of July 13 approval and vesting order; call with and email to E. Newbury regarding materials for August 4 hearing;	0.80
Jul-28-23	F. Finn	Attend call with contractual counterparties to contracts being assigned; multiple correspondence;	0.50
Jul-31-23	V. Tickle	Preliminary review of written submissions of Province of BC with respect to RVO transaction; call with J. Schultz regarding same, Receiver's position, and related matters;	0.60

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Tickle, Vicki	Partner	26.50	735.00	19,477.50
Jacobs, Ryan	Partner	4.50	1,500.00	6,750.00
Finn, Forrest	Associate	0.50	415.00	207.50
Fernandes, Stephanie	Associate	0.40	420.00	168.00
Zhao, Jackie	Law Student	0.50	145.00	72.50
Total (CAD)		32.40		26,675.50

Our Fees	26,675.50
GST @ 5.00%	1,333.78
PST @ 7.00%	1,867.27
TOTAL FEES & TAXES (CAD)	29,876.55

DISBURSEMENT SUMMARY

Taxable Disbursements

Copies	3.50
Agency Fees and Disbursements	867.75
Total Taxable Disbursements	871.25
GST @ 5.00%	43.57
PST @ 7.00%	60.99
Total Taxable Disbursements & Taxes	975.81

TOTAL DISBURSEMENTS & TAXES (CAD)	975.81
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Cassels Brock & Blackwell LLP
KSV Advisory Group
Re: Receivership of Southview Gardens BT LTD., Southview
Gardens Limited Partnership, and Southview Gardens Properties
Ltd.

Page 5 of 33
Invoice No: 2208792
Matter No. 057984-00002

TOTAL FEES	26,675.50
TOTAL DISBURSEMENTS	871.25
TOTAL TAXES	3,305.61
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	30,852.36

This is **Exhibit "F"** referred to in the
Affidavit of Forrest Finn affirmed November 20, 2023

A handwritten signature in blue ink, appearing to read "Valin Tull". The signature is written in a cursive style with a horizontal line through the middle of the letters.

A Commissioner for taking Affidavits in the
Province of British Columbia

Cassels

	Invoice No:	2210805
	Date:	September 07, 2023
	Matter No.:	057984-00002
	GST/HST No.:	R121379572
	PST No.:	1012-5078
Attn: Noah Goldstein KSV Advisory 150 King St W, Suite 2308 Toronto, ON M5H 1J9	Lawyer:	Jacobs, Ryan
	Tel.:	(416) 860-6465
	E-mail:	RJacobs@cassels.com

Re: Receivership of Southview Gardens BT LTD., Southview Gardens Limited Partnership, and Southview Gardens Properties Ltd.

Fees for professional services rendered up to and including August 31, 2023

Our Fees	15,344.50
Estimate of Fees through to termination of Proceedings by October 31, 2023 (excluding any appeals):	100,000.00
Total Fees	<u>115,344.50</u>
Disbursements	79.50
Total Fees and Disbursements	115,424.00
GST @ 5.00%	5,770.78
PST @ 7.00%	8,079.80
TOTAL DUE (CAD)	<u>129,273.86</u>

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CAD EFT and Wire:

Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1

Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

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Invoice No: 2210805
Matter No.: 057984-00002
Amount: **CAD 129,273.86**

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FEE DETAIL

Date	Name	Description	Hours
Aug-01-23	V. Tickle	Continue review of Province written submissions; email to N. Goldstein regarding same and proposed submissions on behalf of receiver; emails with F. Finn regarding affidavit of service; emails with A. Teasdale, J. Yong and N. Goldstein regarding executed amending agreements;	1.40
Aug-02-23	V. Tickle	Instructions to H. Roberts regarding Amending Agreements; finalize forms of same and Approval and Vesting Order; emails with N. Goldstein, T. Quattrin and A. Teasdale regarding fully compiled and executed Amending Agreements and PSAs; emails with N. Goldstein regarding submissions on RVO Transaction hearing;	1.50
Aug-02-23	F. Finn	Draft affidavit of service; prepare materials for filing; review correspondence;	1.30
Aug-03-23	V. Tickle	Emails with D. Yang and various counsel regarding materials for August 4 hearing; prepare submissions for August 4 hearing;	2.00
Aug-04-23	V. Tickle	Finalize form of order approving Receiver's activities and distribution to Peakhill; prepare for and appear on hearing before Mr. Justice Loo; emails with N. Goldstein regarding same;	6.60
Aug-04-23	F. Finn	Assist preparation for hearing;	0.70
Aug-09-23	V. Tickle	Emails with C. Kerzner regarding PSAs;	0.10
Aug-09-23	F. Finn	Review correspondence; update service list; correspond with J. Wong and N. Goldstein at the Receiver;	0.20
Aug-16-23	V. Tickle	Confer and emails with S. Towriss regarding arrangements for closing transaction; emails with A. Teasdale and to N. Goldstein and J. Wong regarding statement of adjustments;	0.30
Aug-16-23	B. Patton	Review correspondence;	0.10
Aug-17-23	V. Tickle	Emails with N. Goldstein and S. Towriss regarding statement of adjustments; review PSAs for purposes of same;	0.40
Aug-18-23	V. Tickle	Emails with S. Towriss and email to N. Goldstein regarding items for statement of adjustments;	0.10
Aug-18-23	S. Towriss	consider query regarding statement of adjustments; advice regarding same;	0.10
Aug-22-23	B. Patton	Review correspondence; review Purchase Agreement;	0.20
Aug-24-23	R. Jacobs	Review decision of Justice Loo regarding RVO. Correspondence with KSV and V. Tickle regarding same.	1.00
Aug-24-23	V. Tickle	Emails with A. Teasdale regarding entered AVO;	0.10
Aug-25-23	V. Tickle	Review reasons for judgment of Mr. Justice Loo; emails with N. Goldstein, J. Wong and S. Towriss regarding same, and next steps; emails with A. Teasdale and W. Roberts regarding arrangements for orders flowing from decision of Justice Loo;	0.50
Aug-28-23	V. Tickle	Call with J. Winters regarding logistics for closing of	1.80

Date	Name	Description	Hours
		purchase and sale transaction; emails and calls with S. Towriss, N. Goldstein and J. Wong regarding same; review corporate search for nominee for purposes of same; emails with L. Williams and C. Whyte regarding minute book for nominee co.; emails with E. Newbery regarding orders flowing from reasons for judgment of Justice Loo;	
Aug-28-23	B. Patton	Review correspondence; review Purchase Agreement; review draft Vendor's Statement of Adjustments; internal discussions;	0.50
Aug-28-23	S. Towriss	review RVO Purchase and Sale Agreement and incoming correspondence regarding closing; receive and review VSA; internal discussions regarding steps to closing; email from Purchaser's lawyer about closing mechanics and minute books, VSA, etc.; conference call with Jordan Wong and Noah Goldstein regarding adjustments and other closing matters; review draft Court Orders;	1.40
Aug-29-23	V. Tickle	Emails with W. Roberts and J. Schultz regarding appearance before Justice Loo to have orders signed, and related matters; prepare and submit request to appear before Justice Loo;	0.50
Aug-29-23	B. Patton	Review correspondence; draft Form C Release and PPSA Authorization to Discharge;	0.40
Aug-30-23	V. Tickle	Email from J. Winters regarding matters relating to closing of transaction;	0.10
Aug-31-23	V. Tickle	Emails with Supreme Court Scheduling, J. Schultz, A. Teasdale, O. James, and call with R. Power, regarding hearing to finalize forms of Order for RVO transaction, and related matters;	0.30

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Jacobs, Ryan	Partner	1.00	1,500.00	1,500.00
Tickle, Vicki	Partner	15.70	735.00	11,539.50
Towriss, Shauna	Partner	1.50	640.00	960.00
Finn, Forrest	Associate	2.20	415.00	913.00
Patton, Brandi	Law Clerk / Paralegal	1.20	360.00	432.00
Total (CAD)		21.60		15,344.50

Cassels Brock & Blackwell LLP
 KSV Advisory Group
 Re: Receivership of Southview Gardens BT LTD., Southview
 Gardens Limited Partnership, and Southview Gardens Properties
 Ltd.

Page 4 of 38
 Invoice No: 2210805
 Matter No. 057984-00002

Our Fees	15,344.50	
Estimate of Fees through to termination of Proceedings by October 31, 2023 (excluding any appeals):	100,000.00	
Total Fees	115,344.50	
GST @ 5.00%	5,767.23	
PST @ 7.00%	8,074.11	
TOTAL FEES & TAXES (CAD)		129,185.84

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

BC Online - PPSA Search/Registrations	8.50
Total Non-Taxable Disbursements	8.50

Taxable Disbursements

Copies	71.00
Total Taxable Disbursements	71.00
GST @ 5.00%	3.55
PST @ 7.00%	4.97
Total Taxable Disbursements & Taxes	79.52

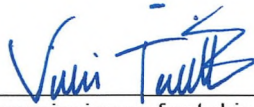
TOTAL DISBURSEMENTS & TAXES (CAD) 88.02

TOTAL FEES	115,344.50
TOTAL DISBURSEMENTS	79.50
TOTAL TAXES	13,849.86
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	129,273.86

OUTSTANDING INVOICES

Invoice Number	Invoice Date	Bill Amount	Payments / Credits	Balance Due
2208792	08/15/23	30,852.36	0.00	30,852.36
2210805	09/07/23	129,273.86	0.00	129,273.86
Total (CAD)		160,126.22	0.00	160,126.22

This is **Exhibit "G"** referred to in the
Affidavit of Forrest Finn affirmed November 20, 2023

A handwritten signature in blue ink, appearing to read "Vain Tait", is written above a horizontal line.

A Commissioner for taking Affidavits in the
Province of British Columbia



Vicki Tickle

Partner

Contact Information

778 309 7954
vtickle@cassels.com

Office

Vancouver

Expertise

- Restructuring & Insolvency

Biography

Vicki Tickle (she/her/hers) is a partner in the Restructuring & Insolvency Group at Cassels. Vicki offers over 20 years of experience in Australia, England, and Canada. She acts on behalf of lenders, insolvency professionals, challenged companies, suppliers, directors and officers, and other stakeholders, in Canada and internationally. Vicki crafts commercial solutions for clients in such diverse fields as financial services, cannabis, retail, construction, real estate, forestry, technology, mining, and manufacturing. She is recognized as a leader in her field by *Best Lawyers* and *Lexpert*.

Representative work includes serving as counsel to:

- PricewaterhouseCoopers Inc. in its role as monitor in the Companies' Creditors Arrangement Act (CCAA) proceedings of Quest University Canada
- A publicly-traded corporation and its affiliates with cannabis operations in the United States in connection with their corporate restructuring under the British Columbia Business Corporations Act
- Creditloans Canada Financing Inc. and Creditloans Canada Capital Inc., financial technology companies engaged in the consumer loans business, in relation to their successful restructuring under the CCAA
- Miniso Canada, a national retailer of Japanese lifestyle products, in connection with its CCAA proceedings
- Deep Sea Mining Finance Ltd., in its role as interim lender to Nautilus Minerals Inc. and certain of its subsidiaries, in the Nautilus Group's CCAA proceedings
- Deloitte Restructuring Inc. in its role as Court-appointed receiver of Wedgemount Power, the developer of an independent run-of-river power project near Whistler, British Columbia
- Physical Enterprises Inc., a health and fitness software development company, in relation to its successful Bankruptcy and Insolvency Act proposal proceedings and business sale
- The monitor of a corporate group, headquartered in Vancouver, British Columbia, with forestry, pulp, and paper operations and assets across Canada, the United States, and

internationally

- The monitor in the CCAA proceedings of a corporation engaged in the acquisition, exploration, development, mining and milling of minerals, including tungsten Acting for Canadian and international suppliers in connection with the CCAA proceedings of Target Canada and Toys "R" Us Canada
- An online fashion retailer regarding its insolvency and restructuring options
- Over 3,400 investors in connection with the CCAA proceedings of a failed investment scheme with debts of more than \$370 million
- The court officer in respect of the receivership and bankruptcy of one of North America's largest pet food and supply retailers
- The senior secured lender in respect of the CCAA proceedings of a large-scale resort development near Victoria, British Columbia

Vicki is a strong promoter and supporter of women working in the restructuring and insolvency area. She is a past Chair of the Western Canada Network of the International Women's Insolvency & Restructuring Confederation.

Prior to joining Cassels, Vicki was a partner in the Vancouver office of another national firm.

Achievements

- *Best Lawyers* (Insolvency and Financial Restructuring)
- *Canadian Legal Expert Directory* (Insolvency & Financial Restructuring)
- *Chambers Canada* (Restructuring/Insolvency)

Education / Bar Admissions

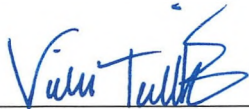
- LL.B., University of Queensland, 1994
- B.A., University of Queensland, 1992

- Queensland, 1997
- England & Wales, 2005
- British Columbia, 2008

Associations

- Canadian Bar Association, BC Branch, Insolvency Section
- Insolvency Institute of Canada
- International Women's Insolvency & Restructuring Confederation (IWIRC), Western Canada Network, Past Chair
- Law Society of England and Wales
- Queensland Law Society

This is **Exhibit "H"** referred to in the
Affidavit of Forrest Finn affirmed November 20, 2023

A handwritten signature in blue ink, appearing to read "Vince Tullis".

A Commissioner for taking Affidavits in the
Province of British Columbia



Forrest Finn

Associate

Contact Information

778 372 6779
ffinn@cassels.com

Office

Vancouver

Expertise

- Litigation
- Restructuring & Insolvency

Biography

Forrest Finn (he/him/his) is an associate in the Restructuring & Insolvency Group at Cassels. Forrest's practice focuses on bankruptcy proceedings, receiverships, and commercial restructuring. He advises and represents trustees, debtors, directors, and creditors and is frequently involved in proceedings pursuant to the *Companies' Creditors Arrangement Act* and the *Bankruptcy and Insolvency Act*. Forrest also practices in commercial litigation and has appeared before the Supreme Courts and Courts of Appeal of British Columbia and Yukon.

During law school, Forrest received the Rotman@Law certificate for business and won the corporate finance award. He was also an active member of the student community, where he helped found the First Generation Network and worked as a research assistant.

Prior to rejoining the firm, Forrest summered and articulated with Cassels and practiced as an associate in the Restructuring Group at another national firm.

Recent Representative Work

- BMO Proposes to Acquire AIR MILES from LoyaltyOne through CCAA Sales Process

Education / Bar Admissions

- J.D., University of Toronto, 2019
- B.A., McGill University, 2015
- British Columbia, 2020
- Yukon, 2022
- Ontario, 2023

Associations

- Law Society of British Columbia
- Law Society of Yukon