



This is the 1st Affidavit of William Roberts
in this case and was made on October 26, 2023

NO. S227651
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

FIRST NATIONAL FINANCIAL GP CORPORATION

PETITIONER

AND:

442746 B.C. LTD., WASTE CONNECTIONS OF CANADA INC.
(formerly, BFI CANADA INC.), ALLIED PLUMBING,
HEATING & AIR CONDITIONING LTD. dba ALLIED
ALTERNATIVE ENERGY, HER MAJESTY THE QUEEN IN
RIGHT OF BRITISH COLUMBIA, HARINDER DHILLON,
KINGSWAY PAVING BC LTD., CITY OF VANCOUVER and
KUMIKKER RANGI

RESPONDENTS

AFFIDAVIT

I, William Roberts, Barrister and Solicitor, of 1600 - 925 West Georgia Street, Vancouver, British Columbia, MAKE OATH AND SAY AS FOLLOWS:

1. I am a Partner with the law firm of Lawson Lundell LLP ("**Lawson**"), solicitors for MNP Ltd., the Court-appointed receiver (the "**Receiver**") of all of the assets, undertakings and property of 442746 B.C. Ltd. (the "**Debtor**"), including proceeds, and as such have personal knowledge of the facts and matters herein deposed to by me, except where stated to be made upon information and belief in which case I believe such facts and matters to be true.
2. I am authorized to swear this Affidavit in support of the taxation and approval of the accounts of Lawson Lundell LLP ("**Lawson**").

3. A Receivership Order was obtained by First National Financial GP Corporation (the “**First National**”) and entered on August 1, 2023, appointing MNP Ltd. as receiver of all of the assets, undertakings and property of the Debtor.
4. Lawson was retained by the Receiver to act on its behalf in respect of the herein receivership proceedings and provided the Receiver certain legal services, which are more particularly set out in the following Statements of Account, true copies of which are attached hereto collectively as **Exhibit “A”**:

Invoice No.	Date	Fees	Disbursements	Taxes	Total
1243993	09/06/23	\$5,742.00	\$60.64	\$692.07	\$6,494.71
1246873	09/28/23	\$3,338.00	\$2.80	\$400.70	\$3,741.50
Totals		\$9,080.00	\$63.44	\$1,092.77	\$10,236.21

5. The foregoing accounts were rendered for services provided to the Receiver in respect of both the herein receivership proceedings and the Receiver’s appointment in Supreme Court of British Columbia proceeding no. S-227652, Vancouver Registry, as receiver of No. 88 Taurus Ventures Ltd (the “**Taurus Receivership**”). The two receivership proceedings are related, and I am advised by the Receiver that amounts payable pursuant to each of the above-noted accounts will be allocated between the two proceedings, such that each of No. 88 Taurus Ventures Ltd. and 442746 B.C. Ltd. will be responsible for one-half of those costs.
6. Each account details the amount of time spent by the timekeeper on the activities noted therein. They were rendered based upon the time spent and billed at the timekeeper’s standard hourly rate. The particulars are set out in each account.
7. In addition, Lawson anticipates further accounts for legal services of approximately \$6,482.00 in respect of the subject application for approval of professional fees and disbursements.
8. In the course of providing the services described in the Statements of Account, time and disbursements were expended by Lawson and billed as follows:

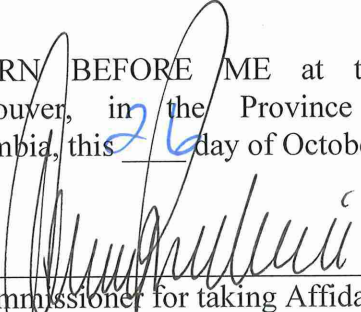
Account Dated: September 6, 2023		
William L. Roberts	5.20 hours @ \$750/hour	\$3,900.00
Baylee Hunt	4.40 hours @ \$335/hour	\$1,474.00
Linda Alexander	1.60 hours @ \$230/hour	\$368.00

	Total Fees	\$5,742.00
Disbursements		
	BC Online	\$12.00
	LTSA	\$48.64
	Total Disbursements	\$60.64
Taxes		
	GST	\$290.13
	PST	\$401.94
	Total	\$6,494.71
Account Dated: September 28, 2023		
William L. Roberts	3.60 hours @ \$750/hour	\$2,700.00
Baylee Hunt	0.60 hours @ \$335/hour	\$201.00
Linda Alexander	1.90 hours @ \$230/hour	\$437.00
	Total Fees	\$3,338.00
Disbursements		
	Photocopies	\$2.80
	Total Disbursements	\$2.80
Taxes		
	GST	\$167.04
	PST	\$233.66
	Total	\$3,741.50


9. I am a member in good standing of the Law Society of British Columbia and have been so since 1999. My practice is devoted primarily to the areas of bankruptcy and insolvency.
10. Baylee Hunt is a member in good standing of the Law Society of British Columbia and has been so since 2021. Ms. Hunt's practice is devoted primarily to the areas of civil and commercial litigation.
11. Linda Alexander is a paralegal employed by Lawson Lundell LLP.

12. This Affidavit is sworn in connection with the taxation of the accounts of Lawson Lundell LLP in respect of this matter and the Taurus Receivership, for fees in the amount of \$9,080.00 together with disbursements in the amount of \$63.44, and taxes in the amount of \$1,092.77, for a total of \$10,236.21. I further estimate legal fees in the total amount of \$12,964.00 to complete this receivership and the Taurus Receivership.

SWORN BEFORE ME at the City of)
Vancouver, in the Province of British)
Columbia, this 26 day of October, 2023.)
)
)
)

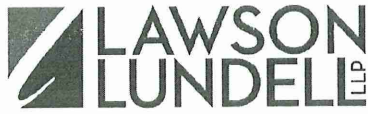


A Commissioner for taking Affidavits for
British Columbia



William L. Roberts

ANNA PACZKOWSKI
Barrister & Solicitor
1600 - 925 WEST GEORGIA ST.
VANCOUVER, B.C. V6C 3L2
(604) 685-3456



Suite 1600 Cathedral Place
 925 West Georgia Street
 Vancouver, BC
 Canada V6C 3L2

MNP LTD.
 SUITE 2200, MNP TOWER
 1021 WEST HASTINGS STREET
 VANCOUVER, B.C.
 V6E 0C3

Invoice Date: 09/06/23
 Invoice No. 1243993
 File No.: 026420.172428

ATTENTION: Doug Chivers


File Description: No. 88 Taurus Venture Ltd.

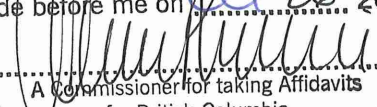
To professional services rendered up to and including August 31, 2023, as per attached detail.

Total Professional Fees	\$	5,742.00
Total Taxable Disbursements and Other Charges	\$	60.64
Total PST BC	\$	401.94
Total GST	\$	290.13
Current Invoice Due:	\$	<u>6,494.71</u>

This is our account.

Lawson Lundell LLP

Per: 
 WILLIAM ROBERTS

This is Exhibit " A " referred to in the
 affidavit of W. Roberts
 made before me on Sept 26, 2023

 A Commissioner for taking Affidavits
 for British Columbia

The contents of this invoice may be subject to solicitor-client privilege. Disclosure of a privileged document to a third party could constitute a waiver of privilege. We recommend that prior to voluntarily sharing the contents of this invoice or providing a copy of it to a tax auditor or other person, that you seek legal advice.

PAYMENT IS DUE UPON RECEIPT OF INVOICE
 INTEREST ON OVERDUE ACCOUNTS WILL BE CHARGED 12% PER ANNUM
 GST #R115124141

MNP LTD.
 SUITE 2200, MNP TOWER
 1021 WEST HASTINGS STREET
 VANCOUVER, B.C.
 V6E 0C3

Invoice Date: 09/06/23
 Invoice No. 1243993
 File No.: 026420.172428

ATTENTION: Doug Chivers

File Description: No. 88 Taurus Venture Ltd.

To professional services rendered up to and including August 31, 2023, as follows:

Date	Timekeeper	Narrative	Hours	Amount
08/09/23	WLR	Taurus - Telephone conference with client regarding background; email from / to client regarding debtor being struck and bailiff	0.50	375.00
08/10/23	WLR	Multiple emails from / to and telephone conference with client and counsel taking possession, claims process order and possible refinance; instructions to legal assistant legal assistant regarding same	0.80	600.00
08/10/23	LEA	Review instructions for sales process application;	0.20	46.00
08/11/23	WLR	Email from / to client and counsel regarding access to properties	0.30	225.00
08/18/23	BMH	Instructions from Will Roberts regarding application for discharge of receiver;	0.20	67.00
08/18/23	WLR	Conference with Baylee Hunt regarding discharge materials	0.40	300.00
08/21/23	WLR	Multiple emails from / to counsel regarding payout and discharge of receiver	0.40	300.00
08/21/23	LEA	Draft payout letter; review land and court searches;	0.60	138.00
08/22/23	BMH	Emails from S. Stephens, C. Brousson, and Will Roberts; prepare application for discharge and fee approval;	0.50	167.50
08/22/23	WLR	Multiple emails from / to counsel and client regarding payout and discharge	0.60	450.00
08/24/23	LEA	Revise letter to counsel for Debtors with requirements for release of properties and discharge of Receiver;	0.60	138.00

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Date	Timekeeper	Narrative	Hours	Amount
08/24/23	WLR	Review and revise payout letter; email to counsel regarding same	0.50	375.00
08/24/23	BMH	Prepare applications for discharge and fee approval; prepare affidavits for fee approval;	1.50	502.50
08/25/23	BMH	Prepare applications for discharge and fee approval; prepare affidavits for fee approval; emails from/to Will Roberts regarding same;	2.00	670.00
08/25/23	LEA	Revisions to payout letter to counsel;	0.20	46.00
08/28/23	WLR	Conference with client regarding refinancing and collection of September rents	0.40	300.00
08/29/23	BMH	Correspondence from C. Brousson, S. Stephens, and Will Roberts;	0.10	33.50
08/29/23	WLR	Email from / to counsel regarding status of refinancing	0.40	300.00
08/30/23	BMH	Emails from C. Brousson, S. Stephens, and R. Sadeghi-Yekta;	0.10	33.50
08/30/23	WLR	Multiple emails from / to counsel regarding possible refinancing	0.50	375.00
08/31/23	WLR	Email from / to client and counsel regarding status of refinancing	0.40	300.00
Total			11.20	5,742.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
LINDA ALEXANDER	LEA	1.60	230.00	368.00
WILLIAM ROBERTS	WLR	5.20	750.00	3,900.00
BAYLEE HUNT	BMH	4.40	335.00	1,474.00
				\$5,742.00

Taxable Disbursements

BC Online	9.00
BC Online Service Charge	3.00
LTSA Service Charge	7.40
LTSA Services	41.24

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Total Fees	\$	5,742.00
Disbursements and Other Charges	\$	60.64
Total PST BC	\$	401.94
Total GST	\$	290.13
CURRENT INVOICE DUE:	\$	6,494.71

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PAYMENT IS DUE UPON RECEIPT OF INVOICE
INTEREST ON OVERDUE ACCOUNTS WILL BE CHARGED 12% PER ANNUM
GST #R115124141



Suite 1600 Cathedral Place
 925 West Georgia Street
 Vancouver, BC
 Canada V6C 3L2

MNP LTD.
 SUITE 2200, MNP TOWER
 1021 WEST HASTINGS STREET
 VANCOUVER, B.C.
 V6E 0C3

Invoice Date: 09/06/23
 Invoice No. 1243993
 File No.: 026420.172428

ATTENTION: Doug Chivers

For Professional Services Rendered Through August 31, 2023

File No.: 026420.172428
 Matter Reference: No. 88 Taurus Venture Ltd.
 Contact: ROBERTS, WILLIAM
 Invoice 1243993

Total Professional Fees	5,742.00
Total Taxable Disbursements and Other Charges	60.64
Total BCPST	401.94
Total GST	290.13
Current Invoice Due:	6,494.71
Previous Balance:	0.00
Total Amount Due:	\$ 6,494.71

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:	
<p>EFT/Wire Transfer: HSBC Bank Canada 885 West Georgia Street, Vancouver, B.C., V6C 3G1 Account Name: Lawson Lundell LLP Account No.: 102337001 Bank ID: 016 Transit: 10270 Swift Code: HKBCCATT</p>	<p>Cheque: Cheques payable to Lawson Lundell LLP and mailed to the following address: Suite 1600 Cathedral Place 925 West Georgia Street Vancouver, BC Canada V6C 3L2</p>
<p>Interac e-Transfer: e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message. Please send password to eftpmt@lawsonlundell.com in separate email.</p>	
<p>Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.</p>	

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE



Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

MNP LTD.
SUITE 2200, MNP TOWER
1021 WEST HASTINGS STREET
VANCOUVER, B.C.
V6E 0C3

Invoice Date: 09/28/23
Invoice No. 1246873
File No.: 026420.172428

ATTENTION: Doug Chivers

File Description: No. 88 Taurus Venture Ltd.

To professional services rendered up to and including September 27, 2023, as per attached detail.

Total Professional Fees	\$	3,338.00
Total Taxable Disbursements and Other Charges	\$	2.80
Total PST BC	\$	233.66
Total GST	\$	167.04
Current Invoice Due:	\$	<u>3,741.50</u>

This is our account.

Lawson Lundell LLP

Per: 
WILLIAM ROBERTS

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PAYMENT IS DUE UPON RECEIPT OF INVOICE
INTEREST ON OVERDUE ACCOUNTS WILL BE CHARGED 12% PER ANNUM
GST #R115124141

MNP LTD.
 SUITE 2200, MNP TOWER
 1021 WEST HASTINGS STREET
 VANCOUVER, B.C.
 V6E 0C3

Invoice Date: 09/28/23
 Invoice No. 1246873
 File No.: 026420.172428

ATTENTION: Doug Chivers

File Description: No. 88 Taurus Venture Ltd.

To professional services rendered up to and including September 27, 2023, as follows:

Date	Timekeeper	Narrative	Hours	Amount
09/05/23	BMH	Emails from C. Brousson and Will Roberts;	0.10	33.50
09/05/23	WLR	Email from / to debtor's counsel regarding status of refinancing	0.30	225.00
09/07/23	BMH	Emails from Will Roberts, S. Stephens. and R. Sadeghi-Yekta;	0.10	33.50
09/07/23	WLR	Email from / to client regarding application to approve sales process; email from / to counsel regarding possible refinancing	0.40	300.00
09/07/23	LEA	Review email correspondence from counsel regarding payout;	0.20	46.00
09/12/23	BMH	Emails from S. Stephens, R. Sadeghi-Yekta, and Will Roberts;	0.20	67.00
09/12/23	LEA	Finalize payout letter, email to parties;	0.50	115.00
09/12/23	WLR	Multiple emails from / to counsel regarding refinancing; review and revise payout letter	0.70	525.00
09/13/23	LEA	Revise and issue payout letter;	0.50	115.00
09/13/23	WLR	Multiple emails from / to counsel regarding refinancing issues	0.40	300.00
09/14/23	LEA	Review various email correspondence form counsel regarding payout and discharge;	0.20	46.00
09/14/23	WLR	Multiple emails from / to counsel and conference with Linda Alexander regarding payout	0.50	375.00
09/15/23	BMH	Emails from counsel for interested parties;	0.10	33.50

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Date	Timekeeper	Narrative	Hours	Amount
09/15/23	LEA	Review email correspondence from counsel for Borrowers, with confirmation of deposit of funds;	0.20	46.00
09/15/23	WLR	Multiple emails from / to counsel to finalize refinancing	1.00	750.00
09/21/23	LEA	Draft letter to client with proceeds;	0.30	69.00
09/22/23	WLR	Letter to client enclosing funds	0.30	225.00
09/27/23	BMH	Email from D. Chivers;	0.10	33.50
Total			6.10	3,338.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
LINDA ALEXANDER	LEA	1.90	230.00	437.00
WILLIAM ROBERTS	WLR	3.60	750.00	2,700.00
BAYLEE HUNT	BMH	0.60	335.00	201.00
				\$3,338.00

Taxable Other Charges

Photocopies	1.80
Colour Photocopies	1.00

Total Fees	\$	3,338.00
Disbursements and Other Charges	\$	2.80
Total PST BC	\$	233.66
Total GST	\$	167.04
CURRENT INVOICE DUE:	\$	3,741.50

Outstanding Prior Balance

Invoice No. 1243993	09/06/23	\$	6,494.71
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Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

9

MNP LTD.
SUITE 2200, MNP TOWER
1021 WEST HASTINGS STREET
VANCOUVER, B.C.
V6E 0C3

Invoice Date: 09/28/23
Invoice No. 1246873
File No.: 026420.172428

ATTENTION: Doug Chivers

For Professional Services Rendered Through September 27, 2023

File No.:	026420.172428	
Matter Reference:	No. 88 Taurus Venture Ltd.	
Contact:	ROBERTS, WILLIAM	
Invoice	1246873	
Total Professional Fees		3,338.00
Total Taxable Disbursements and Other Charges		2.80
Total BCPST		233.66
Total GST		167.04
Current Invoice Due:		3,741.50
Previous Balance:		6,494.71
Total Amount Due:		\$ 10,236.21

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:

HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

Cheque:

Cheques payable to Lawson Lundell LLP and mailed to the following address:

Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

Interac e-Transfer:

e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE