



No. S202352
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

THE TORONTO-DOMINION BANK

PETITIONER

AND:

DDK VENTILATION PRODUCTS LTD.

RESPONDENT

**SECOND AND FINAL REPORT OF RECEIVER WITH RESPECT TO THE
RECEIVERSHIP OF
DDK VENTILATION PRODUCTS LTD.**

**DATED FOR REFERENCE MAY 28, 2021
("RECEIVER'S FINAL REPORT")**

BACKGROUND AND PURPOSE

1. On March 2, 2020, on application by The Toronto-Dominion Bank (“**TD**”), the Honorable Madam Justice Marzari of the Supreme Court of British Columbia (the “**Court**”) made an Order (the “**Receivership Order**”), appointing MNP Ltd. (“**MNP**”) as receiver and manager (in such capacity, the “**Receiver**”) of all of the assets, undertakings and property (collectively, the “**Property**”) of DDK Ventilation Products Ltd. (“**DDK**”, or the “**Company**”).
2. DDK operated as a distributor of ventilation equipment, parts, and components to mechanical, sheet metal, and air conditioning contractors servicing commercial, light industrial and residential construction industries. DDK’s head office was located in Coquitlam, BC and was comprised of a leased office and warehouse facilities. There were two (2) additional leased warehouse and storage facilities located near the head office.
3. A search of the British Columbia Corporate Registry dated February 18, 2020 indicates that David Jagger and Andrew Mindell were directors of DDK (the “**Former Directors**”). A search of the British Columbia Corporate Registry dated April 6, 2021 does not report any information for corporate directors.
4. DDK owns personal property consisting of inventory for resale, warehouse equipment, pallet racking and warehouse shelving, and office furniture and equipment (the “**Tangible Assets**”). Other assets of DDK include trade accounts receivable.
5. This is the Receiver’s Second and Final Report to the Court (the “**Receiver’s Final Report**”) and should be read in conjunction with the Receiver’s First Report to Court, dated May 12, 2020 (the “**Receiver’s First Report**”) and together with the Receiver’s Final Report, the “**Receiver’s Reports**”).
6. The Receiver intends to bring an application (the “**Fee Approval & Discharge Application**”) for an order (the “**Fee Approval & Discharge Order**”) that, among other things: (a) approves the fees of the Receiver and legal counsel to the Receiver, Fasken Martineau DuMoulin LLP (“**Fasken**”); and (b) authorizes the Receiver’s discharge upon completion of the remaining activities in relation to these receivership proceedings (the “**Receivership**”) as detailed herein.
7. In preparing the Receiver’s Final Report and making comments herein, the Receiver has been provided with, and has relied upon, certain unaudited, draft and/or internal financial information of the Company, the Company’s books and records, and information from other third-party sources (collectively, the “**Information**”). The Receiver has not audited, reviewed or otherwise attempted to verify the accuracy or completeness of the Information in a manner that would wholly or partially comply with generally accepted assurance standards or other standards established by the Chartered Professional Accountants of Canada.
8. The purpose of the Receiver’s Final Report is to advise the Court with respect to the following matters:

- Sale of Tangible Assets;
- Outline of Receiver's administration since the Receiver's First Report;
- Priority Claims;
- Receiver's Statement of Receipts and Disbursements dated May 20, 2021;
- Fees and Disbursements of the Receiver;
- Fees and Disbursements of the Receiver's legal counsel, Fasken;
- Distribution of Proceeds;
- Status of the Company's records; and
- Receiver's Discharge.

SALE OF TANGIBLE ASSETS

9. Pursuant to the Order of the Honourable Madam Justice Fitzpatrick made on May 14, 2020 (the "**Sale Approval Order**"), the Court approved the sale of the Company's Tangible Assets (the "**Sale**") in accordance with the terms of an Asset Purchase Agreement dated May 8, 2020, between the Receiver and Pitt Meadows Plumbing & Mechanical Systems Ltd. (the "**Purchaser**"). The purchase price was \$402,000.
10. The Sale closed and the Receiver deposited the sale proceeds to the Receiver's trust account. The Receiver filed the Receiver's Certificate in accordance with the Sale Approval Order.
11. The Receiver and its legal counsel attended to the discharge of registrations in the British Columbia Personal Property Registry relating to the Tangible Assets.

RECEIVER'S ADMINISTRATION SINCE THE RECEIVER'S FIRST REPORT

12. The Receiver completed the Sale and effected the transfer of the Tangible Assets to the Purchaser.
13. As the Tangible Assets were located at various premises leased by DDK, the Receiver paid occupation rent until the Tangible Assets were removed. The Purchaser paid occupation rent to the Receiver for the time required to remove the Tangible Assets.
14. With the consent of the Former Directors, the Receiver arranged for the removal and shredding of over three hundred (300) boxes of historical Company records stored at DDK's leased premises. The Former Directors paid the Receiver for the cost of the removal and shredding of the records.
15. The Receiver cancelled insurance coverage and executed documents in relation to same and received a refund of unearned premiums.
16. The Receiver closed the various utilities' accounts maintained by the Receiver.

17. The Receiver maintained and updated the Service List and the Receiver's website for the Receivership. Copies of relevant documents relating to these proceedings are available on the Receiver's website at: <https://mnpdebt.ca/en/corporate/corporate-engagements/ddk-ventilation-products-ltd>
18. The Receiver prepared and filed statutory reports as required pursuant to subsection 246(2) of the *Bankruptcy and Insolvency Act*.
19. The Receiver prepared and filed Goods and Services Tax ("GST") returns on behalf of the Receiver.
20. The Receiver prepared and filed GST returns and other statutory returns on behalf of the Company and corresponded and exchanged information with the Canada Revenue Agency ("CRA") and other regulatory agencies in relation to amounts owed by DDK.
21. The Receiver received and responded to various creditor and stakeholder inquiries throughout the Receivership.

Sale of DDK's Interest in Memorandum of Understanding

22. On or around October 2, 2018, DDK and Ningbo Xinbaole Precision Machinery Co. Ltd. ("NXPM") entered into a Memorandum of Understanding (the "MOU") with respect to the manufacture and sale of a specified product listing. In general terms, the MOU sets out the proposed business terms and obligations of DDK and NXPM. One of DDK's obligations under the MOU was the purchase of equipment costing \$22,400 USD. DDK purchased the equipment, which was then stored at NXPM's warehouse located outside of Shanghai, China.
23. In April 2021, the Receiver and NWSM Holdings Ltd. ("NWSM") agreed to the terms of an Assignment Agreement dated April 29, 2021, which assigned DDK's interests in the equipment, and any information and data obtained from testing the equipment pursuant to the MOU, to NWSM.
24. The consideration paid to the Receiver by NWSM in respect of the Assignment Agreement was \$6,500, which has been paid and the Receiver deposited such proceeds to the Receiver's trust account.

Accounts Receivable

25. As discussed in the Receiver's First Report, at the commencement of the Receivership, the Company's books and records reported trade accounts receivable of approximately \$1,835,000. Given the age and status of the various accounts, the Receiver's initial estimate of collectable accounts receivable ranged between a low of \$450,000 and a high of \$750,000.
26. The Receiver continued to pursue outstanding accounts receivable and provided instructions to Fasken to issue formal demand letters, file statements of claims, and register builder's liens pursuant to the British Columbia *Builders Lien Act*.

27. To date, the Receiver has collected accounts receivable totaling approximately \$1,390,000 and does not anticipate any further amounts to be collected.

PRIORITY CLAIMS

Statutory Priority Claims

28. The Receiver filed documents in accordance with the *Wage Earner Protection Program Act* with Service Canada pertaining to wage arrears owing to fourteen (14) employees of DDK. The maximum amount payable to Service Canada under Section 81.4 of the *Bankruptcy and Insolvency Act* is approximately \$15,732, the priority for which ranks ahead of all registered security interests in relation to the Company's current assets. A Statement of Account dated March 24, 2021 reports a priority claim of \$14,351.54, as one employee with a Section 81.4 claim in the amount of \$1,380 did not file a claim with the Receiver.
29. The Receiver has confirmed that no amounts are owing to CRA with respect to unremitted payroll source deductions or unremitted GST.
30. The Ministry of Finance (the "**Ministry**") filed a claim with the Receiver, claiming \$5,927.57 due and owing by DDK as a priority lien on account of unremitted provincial sales tax.
31. Worksafe BC filed a claim with the Receiver, claiming \$1,179.27 due and owing by DDK as a priority lien on account of unremitted assessments.

TD's Claim and Security

32. As discussed in the Receiver's First Report, the Receiver obtained a legal opinion from Fasken with respect to the security granted by DDK to TD.
33. The legal opinion indicated that, based on a review of the various security and credit agreements and searches conducted, TD holds a valid and perfected security interest in all DDK's present and after acquired personal property (the "**TD Security**").
34. The Receiver is unaware of any other creditors having a security interest in the assets of DDK by virtue of a security agreement which ranks in priority ahead of the TD Security.
35. On February 9, 2021, and as authorized by the terms of the Sale Approval Order, the Receiver made an interim distribution to TD in the amount of \$1,300,000 on account of the TD Security.
36. The outstanding balance of TD's indebtedness as at April 1, 2021 was \$626,870.49 and interest and expenses, including legal costs which continue to accrue (collectively, the "**TD Indebtedness**").

The Roger Sjodin Family Trust and The Carmen Sjodin Family Trust

37. As set out in the Receiver's First Report, Roger Sjodin, as Trustee of The Roger Sjodin Family Trust, and Carmen Sjodin, as Trustee of The Carmen Sjodin Family Trust (the "**Sjodin Parties**"), registered notice of security interests in the Personal Property Registry, notice of which was registered on April 5, 2018.
38. Attached as Exhibit "G" to the 1st affidavit of Joe Seidel, an Associate Vice President of TD, made on February 27, 2020 and filed in these proceedings, is a Subordination and Standstill Agreement dated April 20, 2018 (the "**Subordination Agreement**") and executed on behalf of TD and the Sjodin Parties. Pursuant to the Subordination Agreement, the Sjodin Parties postponed and subordinated their security to the TD Security.
39. The balance of funds currently held in trust by the Receiver is less than the TD Indebtedness. Therefore, no funds will be available to satisfy subsequent financial charges. Accordingly, the Receiver has not obtained a legal opinion with respect to the security granted by DDK to the Sjodin Parties.

RECEIVER'S STATEMENT OF RECEIPTS AND DISBURSEMENTS

40. Attached as **Appendix "A"** to this report is the Receiver's Statement of Receipts and Disbursements for the period ending May 19, 2021. The Receiver held a balance of \$223,347.89 in the Receivership trust account at that time.

FEES AND DISBURSEMENTS OF THE RECEIVER

41. Attached hereto as **Appendix "B"** and summarized below is a summary of the Receiver's invoices for professional fees from the commencement of these proceedings to April 30, 2021 ("**Receiver's Fee Period**"). The Receiver invoiced fees amounting to \$240,841.80 plus taxes in the amount of \$12,042.13, for a total of \$252,883.93 (the "**Receiver's Fees**"). The Receiver's Fees were charged at the Receiver's standard hourly rates from time to time.

Invoice Date	Fees (\$)	Disbursements (\$)	GST/PST (\$)	Total (\$)
April 13, 2020	70,312.30	0.00	3,515.62	73,827.92
May 20, 2020	28,569.10	0.00	1,428.46	29,997.56
June 30, 2020	33,301.30	0.00	1,665.07	34,996.37
July 21, 2020	21,303.80	0.00	1,065.19	22,368.99
August 21, 2020	24,727.00	0.00	1,236.35	25,963.35

September 28, 2020	10,245.00	0.00	512.25	10,757.25
October 2, 2020	7,991.50	0.00	399.58	8,391.08
November 2, 2020	8,769.00	0.00	438.45	9,207.45
December 10, 2020	2,346.30	0.00	117.32	2,463.62
January 21, 2021	4,911.50	0.00	245.58	5,157.08
March 30, 2021	5,511.90	0.00	275.60	5,787.50
February 23, 2021	5,520.60	0.00	276.03	5,796.63
April 19, 2021	6,430.40	0.00	321.52	6,751.92
May 5, 2021	10,902.10	0.00	545.11	11,447.21
Total	\$240,841.80	0.00	12,042.13	\$252,883.93

42. The referenced appendix also includes the Receiver's estimate of charges from May 1, 2021 to present for services rendered from that date to the conclusion of the receivership, which charges the Receiver estimates at \$8,500 including fees and disbursements, before applicable taxes.
43. Attached hereto as **Appendix "C"** is a summary of the time expended by the officers and employees of the Receiver in respect of the Receiver's Fees during the Receiver's Fee Period (the "**Time Summary**"). As detailed in the Time Summary, the Receiver invoiced 590.25 hours in relation to services provided in respect of the Receiver's Invoices.
44. Copies of the invoices issued by the Receiver in respect of the Receiver's Fees (collectively, "**Receiver's Invoices**") are attached as Exhibit "A" to the 1st Affidavit of Patty Wood in these proceedings made on May 28, 2021.
45. The Receiver's activities during the Receiver's Fee Period are well documented in the Receiver's Reports.
46. The work completed by the Receiver was delegated to the appropriate professionals in the Receiver's organization based on experience, seniority, and hourly rates. To the best of the Receiver's knowledge, the Receiver's Fees are commensurate with fees charged by similar firms in British Columbia with the capacity to handle a file of size and complexity comparable to this matter.

FEES AND DISBURSEMENTS OF THE RECEIVER'S COUNSEL

47. For administrative and accounting purposes, Fasken maintained separate file numbers and issued invoices in respect of each of the various collection proceedings and actions within the larger Receivership. The fees and disbursements of Fasken for all professional fees related to the Receivership have been reviewed and approved by the Receiver.
48. Copies of the invoices issued by Fasken to the Receiver in respect of such fees (collectively, **Fasken's Invoices**) are attached as Exhibits "A" to "H" to the 1st Affidavit of Fergus McDonnell in these proceedings made on May 28, 2021.
49. As detailed in Fasken's Invoices, which also include summaries of time spent by each timekeeper and detailed docket entries, from March 10, 2020 to March 26, 2021 ("**Fasken's Fee Period**"), Fasken invoiced fees amounting to \$96,459.00 and incurred and invoiced for disbursements in the amount of \$3,457.61 and taxes in the amount of \$11,658.77, for a total of \$111,575.38 (collectively, "**Fasken's Fees**"). Fasken has received payment from the Receiver for the full amount of Fasken's Fees.
50. A summary of Fasken's Fees during Fasken's Fee Period is attached hereto as **Appendix "D"**, and summarized below:

Period Covered	Fees (\$)	Disbursements (\$)	GST/PST (\$)	Total (\$)
March 10, 2020 to March 31, 2021	1,461.00	37.80	177.21	1,676.01
April 1, 2020 to April 30, 2020	980.00	0.00	117.60	1,097.60
May 1, 2020 to May 31, 2020	17,148.50	256.50	2,063.50	19,468.50
June 1, 2020 to June 30, 2020	8,178.00	224.79	992.60	9,395.39
July 1, 2020 to July 31, 2020	26,537.00	472.15	3,197.28	30,206.43
August 1, 2020 to August 31, 2020	8,645.00	1,143.54	1,049.58	10,838.12
September 1, 2020 to September 30, 2020	10,934.50	689.22	1,334.07	12,957.79
October 1, 2020 to October 31, 2020	6,764.50	135.95	815.49	7,715.94
November 1, 2020 to November 30, 2020	3,321.50	32.74	399.52	3,753.76
December 1, 2020 to December 31, 2020	2,830.50	264.50	344.18	3,439.18
January 1, 2021 to January 31, 2021	1,900.50	12.00	228.06	2,140.56
February 1, 2021 to February 28, 2021	3,225.50	129.83	392.85	3,748.18
March 1, 2020 to March 31, 2021	4,532.50	58.59	546.83	5,137.92
Total	\$96,4659.00	\$3,457.61	\$11,658.77	\$111,575.38

51. Attached hereto as **Appendix “E”** is a summary of the time expended by the partners and employees of Fasken acting as counsel to the Receiver in relation to the Fasken’s Fees. As set out in Appendix “E”, the hours relating to the services provided by Fasken in relation to the matters dealt with in such accounts totalled 239.3 hours.
52. The Receiver confirms that all services listed in Fasken’s Invoices were rendered at the request of the Receiver, performed satisfactorily, and that, in the Receiver’s view, the fees and disbursements charged were fair, reasonable and consistent with the market for such legal services in British Columbia.
53. Fasken estimates that its fees and disbursements to the completion of this matter, inclusive of WIP, will total approximately \$11,200 (plus applicable taxes).

DISTRIBUTION OF PROCEEDS

54. Based upon the claims known to the Receiver to date, the Receiver seeks approval of the following payments from funds held by the Receiver:
 - a) To Service Canada - \$14,351.54 representing amounts secured pursuant to section 81.4(4) of the *Bankruptcy and Insolvency Act*;
 - b) To the Ministry - \$5,927.57 on account of unremitted provincial sales tax due under the *Provincial Sales Tax Act* and owed by DDK, and which has the benefit of a priority lien;
 - c) To WorkSafe BC - \$1,179.27 on account of unremitted assessments due under the *Workers’ Compensation Act* and owed by DDK, and which has the benefit of a priority lien;
 - d) To the Receiver - payment of the Receiver’s Fees and the estimated costs to completion of the Receivership;
 - e) To Fasken - payment of Fasken’s Fees and the estimated costs to completion of the Receivership; and
 - f) To TD – the remainder to be distributed on account of the TD Security.

STATUS OF THE COMPANY’S BOOKS AND RECORDS

55. The Receiver is in possession of certain books and records of DDK pertaining to the administration of the Receivership. The Receiver proposes to:
 - (a) mail a notice to each of the Former Directors at the addresses shown in the corporate search conducted February 18, 2020, requiring that the Former Directors take possession of the books and records within thirty (30) days; and

- (b) if such Former Director(s) do not make satisfactory arrangements with the Receiver to pick up such books and records within the referenced thirty (30) day period, to destroy the books and records.

RECEIVER'S DISCHARGE

- 56. All matters pertaining to the administration of the Receivership have been substantially finalized, with the exception of the following administrative matters:
 - a) making final distribution of remaining funds, preparing the final bank reconciliations and closing the Receiver's bank account;
 - b) preparing the final GST return and closing the Receiver's GST account;
 - c) receiving GST refunds owing to the Receiver;
 - d) preparing and issuing the Receiver's final report pursuant to subsection 246(3) of the *Bankruptcy and Insolvency Act*; and
 - e) any other matters incidental to the wind up of the administration of the Receivership.
- 57. Upon the resolution of the above noted administrative matters, which are not material and in the Receiver's view, should not prevent the Court from granting an unconditional discharge, the Receiver is seeking its discharge.

COURT APPROVAL SOUGHT

- 58. Based on the foregoing, the Receiver seeks a Court Order for the following relief:
 - a) approving the Receiver's activities in the administration of this Receivership as set out in the Receiver's Reports;
 - b) approving the Receiver's Fees as set out in **Appendices "B" and "C"**, including the estimate to conclude the Receivership as set out in those appendices;
 - c) approving Fasken's Fees as set out in **Appendices "D" and "E"** and including the estimate to conclude the Receivership as set out in those appendices;
 - d) approving the Receiver's Statement of Receipts and Disbursements dated May 20, 2021;
 - e) authorizing the payment of \$14,351.54 to Service Canada, representing amounts secured pursuant to section 81.4(4) of the *Bankruptcy and Insolvency Act*;
 - f) authorizing the payment of \$5,927.57 to the Ministry on account of its priority lien;
 - g) authorizing the payment of \$1,179.27 to Worksafe BC on account of its priority lien;

- h) directing the payment of all funds remaining in the Receiver's trust account, after payments aforesaid, to TD;
- i) authorizing the return or destruction of the books and records of the Company in accordance with Paragraph 54 of the Receiver's Final Report; and
- j) discharging the Receiver.

DATED AT Vancouver, British Columbia, this 28th day of May, 2021.

MNP Ltd.

**In its capacity as Receiver and Manager of
DDK Ventilation Products Ltd.**

and not in its personal capacity



Per: Patty E. Wood CPA, CGA, CIRP, LIT
Senior Vice President

Appendix A

**In the Matter of the Receivership of
DDK Ventilation Products Ltd.**

**Interim Statement of Receipts and Disbursements
March 2, 2020 to May 19, 2021**

RECEIPTS

Advance from Secured Creditor	125,062.69
Cash on Hand	1,330.75
Collection of Accounts Receivable	1,393,044.15
GST Collected	325.00
Interest	7.45
Miscellaneous Income	1,051.98
Miscellaneous Refunds	277.51
Sale of Assets	<u>408,500.00</u>

TOTAL RECEIPTS

\$ 1,929,599.53

DISBURSEMENTS

Appraisal Fees	2,250.00
Bank Service Charges	20.00
Contract Labour	6,865.51
Filing Fees	365.00
GST Paid	1,963.61
Insurance premiums	3,241.00
Legal Fees - Counsel to the Receiver	106,668.77
Legal Notice	476.24
Licences and Permits	482.50
Lock Change	449.46
Other: Travel/Courier/Payroll Services	370.98
Payments to Secured Creditor	1,300,000.00
Receiver's Fees	240,841.80
Redirection of Mail	569.10
Rent	37,423.74
Repairs & Maintenance	250.00
Security	300.69
Telephone and Utilities	<u>3,713.24</u>

TOTAL DISBURSEMENTS

\$ 1,706,251.64

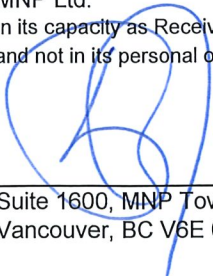
BALANCE ON HAND

\$ 223,347.89

Dated at the City of Vancouver, in the Province of British Columbia, this 20th day of May, 2021.

MNP Ltd.

In its capacity as Receiver of DDK Ventilation Products Ltd.
and not in its personal or corporate capacity



Suite 1600, MNP Tower, 1021 West Hastings Street
Vancouver, BC V6E 0C3

Appendix B

Summary of Professional Fees - Receiver

Period Covered	Fees (\$)	Disbursements (\$)	Taxes (\$)	Total (\$)
March 2, 2020 to March 31, 2020	70,312.30		3,515.62	73,827.92
April 1, 2020 to April 30, 2020	28,569.10		1,428.46	29,997.56
May 1, 2020 to May 31, 2020	33,301.30		1,665.07	34,966.37
June 1, 2020 to June 30, 2020	21,303.80		1,065.19	22,368.99
July 1, 2020 to July 31, 2020	24,727.00		1,236.35	25,963.35
August 1, 2020 to August 31, 2020	10,245.00		512.25	10,757.25
September 1, 2020 to September 30, 2020	7,991.50		399.58	8,391.08
October 1, 2020 to October 31, 2020	8,769.00		438.45	9,207.45
November 1, 2020 to November 30, 2020	2,346.30		117.32	2,463.62
December 1, 2020 to December 31, 2020	4,911.50		245.58	5,157.08
January 1, 2021 to January 31, 2021	5,511.90		275.60	5,787.50
February 1, 2021 to February 28, 2021	5,520.60		276.03	5,796.63
March 1, 2021 to March 31, 2021	6,430.40		321.52	6,751.92
April 1, 2021 to April 30, 2021	10,902.10		545.11	11,447.21
TOTAL	\$ 240,841.80	\$ -	\$ 12,042.13	\$ 252,883.93
May 1, 2021 to present including estimate for Receiver's time to complete duties	\$ 8,480.00	\$ 20.00	\$ 425.00	\$ 8,925.00
GRAND TOTAL	\$ 249,321.80	\$ 20.00	\$ 12,467.13	\$ 261,808.93

Appendix C

Summary of Time - Receiver
(in relation to Receiver's accounts referenced in Appendix B)

CONSOLIDATED TIME BY PROFESSIONAL

Professional	Position	Average Rate / Hour (\$)	No. of Hours	Time Value (\$)
Patty Wood	Trustee/Partner	542	129.40	70,090.00
Greg Ibbott	Trustee/Sr. Mgr.	396	154.00	61,049.00
Julie Kennedy	Trustee/Sr. Mgr.	394	242.40	95,542.00
Elizabeth Chen	Trust Accountant	287	27.10	7,772.70
Heather Ursaki	Admin. Assistant	143	28.50	4,083.90
Various	Support Staff	260	8.85	2,304.20
Total			590.25	\$ 240,841.80

Appendix D

Summary of Legal Fees and Disbursements - Fasken Martineau DuMoulin LLP

Period Covered	Fees (\$)	Disbursements (\$)	Taxes (\$)	Total (\$)
March 10, 2020 to March 31, 2020	1,461.00	37.80	177.21	1,676.01
April 1, 2020 to April 30, 2020	980.00	-	117.60	1,097.60
May 1, 2020 to May 31, 2020	17,148.50	256.50	2,063.50	19,468.50
June 1, 2020 to June 30, 2020	8,178.00	224.79	992.60	9,395.39
July 1, 2020 to July 31, 2020	26,537.00	472.15	3,197.28	30,206.43
August 1, 2020 to August 31, 2020	8,645.00	1,143.54	1,049.58	10,838.12
September 1, 2020 to September 30, 2020	10,934.50	689.22	1,334.07	12,957.79
October 1, 2020 to October 31, 2020	6,764.50	135.95	815.49	7,715.94
November 1, 2020 to November 30, 2020	3,321.50	32.74	399.52	3,753.76
December 1, 2020 to December 31, 2020	2,830.50	264.50	344.18	3,439.18
January 1, 2021 to January 31, 2021	1,900.50	12.00	228.06	2,140.56
February 1, 2021 to February 28, 2021	3,225.50	129.83	392.85	3,748.18
March 1, 2021 to March 31, 2021	4,532.50	58.59	546.83	5,137.92
TOTAL	\$ 96,459.00	\$ 3,457.61	\$ 11,658.77	\$ 111,575.38

April 1, 2021 to present including estimate
for Fasken's time to complete duties
\$11,200 fees and disbursements plus taxes

\$12,544.00

GRAND TOTAL

\$ 124,119.38

Appendix E

Summary of Time - Fasken Martineau DuMoulin LLP
(in relation to legal accounts referenced in Appendix D)

CONSOLIDATED TIME BY PROFESSIONAL

Professional	Position	Average Rate / Hour (\$)	No. of Hours	Time Value (\$)
Kibben Jackson	Partner	\$ 675.81	12.3	\$ 8,312.50
Fergus McDonnell	Associate	\$ 440.84	82	\$ 36,149.00
Oliver Leung	Associate	\$ 357.70	67.4	\$ 24,109.00
David MacLean	Associate	\$ 365.00	46.2	\$ 16,863.00
Various	Support Staff	\$ 351.13	31.4	\$ 11,025.50
Total			239.3	\$ 96,459.00