

No. S-235790  
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

THE TORONTO-DOMINION BANK

PETITIONER

AND:

KLONDIKE CONTRACTING CORPORATION, FBS  
FAIRVIEW BUILDER SERVICES INCORPORATED,  
RAVINDRANAATH BHIM and SEYED REZA MOHSEN  
POUR also know as REZA MOHSENPOUR

RESPONDENT

**FIRST REPORT OF RECEIVER WITH RESPECT TO THE RECEIVERSHIP OF  
KLONDIKE CONTRACTING CORPORATION & FBS FAIRVIEW BUILDER  
SERVICES INCORPORATED**

**DATED FOR REFERENCE OCTOBER 8, 2024  
("RECEIVER'S FIRST REPORT")**

## BACKGROUND AND PURPOSE

1. Pursuant to an Order pronounced by the Honorable Justice Ahmao of the Supreme Court of British Columbia (the “**Court**”) on August 24, 2023 (the “**Receivership Order**”), MNP Ltd. was appointed as Receiver and Manager (the “**Receiver**”) of all of the assets, undertakings and property (collectively, the “**Assets**”) of Klondike Contracting Corporation (“**KCC**”) and FBS Fairview Builder Services Incorporated (“**FBS**”, and collectively the “**Companies**”).
2. The Companies and Toronto-Dominion Bank (“**TD Bank**”) entered into a forbearance agreement that, among other things, included that if the Companies met the terms of this agreement that the Receivership Order would not be entered. The Companies failed to comply with the terms of the forbearance agreement and the Receivership Order was entered on October 18, 2023.
3. KCC was a construction company and provided a range of services including design, construction management and general contracting services with its primary focus being on acting as a general contractor on renovation and construction projects. FBS is a company related to KCC by way of common control and also operated in the construction industry. FBS provided services to general contractors including labour, tool and equipment rentals and the supply of various other services including project management, rubbish removal and bin services. We understand that KCC and FBS are interrelated as KCC often engaged the services of FBS to carry out duties on its various projects.
4. Searches of the British Columbia Corporate Registry performed on August 2, 2023, indicate that Mr. Reza Mohsenpour (“**Mr. Mohsenpour**”) was the sole director of both KCC and FBS.
5. In preparing the Receiver’s First 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 Companies, the Companies’ books and records, and information from other third-party and related 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.
6. The purpose of the Receiver’s First Report is to advise the Court with respect to the following matters:
  - Outline of the Receiver’s administration to date;
  - Outline the collection efforts undertaken by the Receiver with respect to the accounts receivable;
  - Outline of priority claims;

- Outline transactions which had the effect of giving a preference to a creditor and to seek direction regarding the same;
- Receiver's Interim Statement of Receipts and Disbursements; and
- Fees and Disbursements of the Receiver and the Receiver's legal counsel.

## OUTLINE OF RECEIVER'S ADMINISTRATION TO DATE

7. On October 18, 2023, the Receiver attended the Companies' primary office and confirmed that the Companies has previously vacated the premises. The Receiver engaged in correspondence with Mr. Mohsenpour and Mr. Tim Keith ("**Mr. Keith**", and jointly "**Management**"), former Vice President of Construction Operations of KCC, to assess the status of the Companies' assets, liabilities and operations as of the Receiver's appointment.
8. Since that date, the Receiver's activities have included, among other things, the following:
  - (a) Reviewing the Companies' books and records. The Companies used Viewpoint Spectrum ("**Spectrum**") for its accounting and bookkeeping, Procore Construction Software ("**Procore**") for project management and Sharepoint for its cloud file storage. The Receiver reviewed the information available and determined that the books and records were not up to date with regards to tracking assets, status of various ongoing projects, or with regards to financial reporting. Further, the Companies' Management reported that it had experienced turnover in their accounting department and the information reported in Spectrum was materially misstated. As a result, the Receiver performed significant investigation, inquiry, and reconciliation of the Companies' accounting and other systems;
  - (b) issued notices to the Companies' banks requesting that any funds held in the Companies' accounts be directed to the Receiver;
  - (c) issued demand letters in respect of the Companies' outstanding accounts receivable balances following reconciliations performed by the Receiver, and ongoing correspondence regarding these accounts;
  - (d) responding to various creditor inquiries throughout the receivership proceedings; and
  - (e) maintaining and updating the Service List and the Receiver's website for the receivership proceedings at <https://mnpdebt.ca/en/corporate/corporate-engagements/klondike-contracting-corporation-and-fbs-fairview-builder-services>.

9. Further, the Receiver attended to various statutory duties including filing a notice of appointment of receiver pursuant to the *Business Corporations Act* (British Columbia), posting a notice of the receivership in the Vancouver Sun as required by the *Personal Property Security Act* (British Columbia), preparing a Notice and Statement of Receiver which was sent to all known creditors of the Companies as required by the *Bankruptcy and Insolvency Act* (the “**BIA**”), and attending to filing requirements pursuant to the *Wage Earner Protection Program Act* (“**WEPPA**”).

## **Employees**

10. The Receiver terminated the Companies’ employees effective as of the date the Receivership Order was entered.
11. Prior to the Receivership, ADP ceased providing payroll services to the Companies due to outstanding fees for their services. The final pay period in which ADP performed payroll services for the Companies was August 18, 2023. Subsequent payrolls were manually performed by the Companies’ bookkeeper on excel sheets. The manual payroll function resulted in a number of issues in administering the Companies’ payroll including failure to remit payroll source deductions, employees receiving incorrect or delayed wage payments or not receiving payments for wages at all.
12. The Receiver worked with the former bookkeeper to prepare the Records of Employment for all employees in accordance with their termination at the date of receivership.
13. The Receiver filed documents in accordance with WEPPA with Service Canada pertaining to wage arrears owing to thirteen FBS employees and twenty-eight KCC employees.
14. The Receiver prepared and filed the T4 forms for the employees for the period covering January 1, 2023, until October 18, 2023.
15. As previously reported, the incomplete and inaccurate payroll information provided by the Companies led to significantly more inquiry, investigation and correspondence with employees than would have been required with accurate information to properly complete the statutory documents described above.

## **Assets**

16. The Receiver confirmed that at the time the Receivership Order was entered the Companies’ assets included leased vehicles, small tools and equipment with negligible value, cash in accounts held with TD Bank and the Royal Bank of Canada (“**RBC**”) and accounts receivable from the various ongoing projects.
17. The Receiver identified multiple bank accounts at two different banks held by the Companies. The Receiver notified each financial institution of the Receivership

proceedings and requested that the funds be directed to the Receiver. RBC and TD confirmed that the Companies' bank accounts had been depleted prior to the Receivership.

18. The FBS accounts receivable listing at the time of the Receivership Order reported total outstanding accounts of approximately \$1,280,000 which is primarily owed from KCC and other companies related to FBS by common control.
19. The KCC accounts receivable listing reported total outstanding accounts of approximately \$4,200,000. Similar to FBS, the KCC accounts receivable listing includes some amounts owing from companies related by way of common control.
20. The Receiver is continuing to review the support for amounts owed from companies related by way of common control.
21. The Receiver discussed the accounts receivable listings with Mr. Keith and Mr. Mohsenpour who further confirmed that the information on Spectrum required updating by the Receiver, and in their opinion the projects with British Columbia Housing Management Commission ("**BC Housing**"), Lonsdale Market Quay Corporation ("**LQM**"), Khalsa Credit Union ("**Khalsa**") and Johnson Controls Canada LP ("**Johnson Controls**") represented the material outstanding accounts receivable.
22. The Receiver reviewed the projects that were ongoing at the time of the Receivership Order. It appeared that the relationships between the owners and KCC as general contractor or construction manager had been strained primarily due to subcontractors engaged by KCC going unpaid and filing liens against the projects. Several projects quickly issued termination notices on or around the time of the Receivership Order being entered. The Receiver determined that the costs of completing the projects outweighed the potential benefits and elected to not continue any of the Companies' projects.
23. The Receiver notified all customer accounts of the requirement to pay directly to the Receiver. The accounts receivable collections to the date of this report are approximately \$10,600, with the larger project accounts receivable requiring ongoing collections efforts.
24. The Receiver engaged in correspondence with the Companies' previous legal counsel, Coal Harbour Law. Prior to the Receivership, Coal Harbour Law had been engaged in settlement discussions with project owners and various subcontractors engaged by KCC. As such, Coal Harbour Law was aware of the specific information as to the collectability of the accounts and the offsetting and opposing claims. The Receiver requested that Coal Harbour Law prepare an analysis of the accounts with potential material realizations. Coal Harbour Law's analysis concluded that the accounts with the primary source of potential realizations include the BC Housing, LQM Projects, and Khalsa.

### Johnson Controls

25. KCC was engaged as the general contractor by Johnson Controls for the completion of a project with a final adjusted total contract price of \$95,751.05. The work under the contract was completed by KCC and certificate of completion was issued on September 29, 2023. Johnson Controls withheld payments due to KCC subject to confirming lien claims filed by subcontractors engaged by KCC. Johnson Controls made an application to deposit the sum of \$82,844.39 into court, being the contract price less legal fees. The Order was granted, and the Receiver is in the process of requesting the funds from Court and will distribute approximately 10% of the adjusted contract price to the three lien claimants in accordance with the builder's lien act. The balance will be realized for the benefit of the Receivership estate.

### LQM

26. LQM and KCC entered into a construction contract in the form of a CCDC2 contract which is commonly used in construction projects between the project owner and the contractor in which a stipulated price is agreed to by both parties. The parties entered into the contract in December of 2021. Further, LQM requested via a purchase order in May of 2022 that KCC provide certain additional remediation work and other services for the parking lot adjacent to the project.
27. Coal Harbour Law provided the Receiver with a settlement agreement between LQM and KCC dated September 15, 2023 (the "**Settlement Agreement**"). The Settlement Agreement confirmed, among other things, that LQM would pay \$433,557 to Coal Harbour Law to be distributed to unpaid subcontractors and that the payment would settle all disputes between the parties including unpaid KCC invoices totalling \$463,532 (the "**Settled Invoices**").
28. MNP received confirmation from Coal Harbour Law that it had received the Settlement Payment and that it has administered payments to subtrades in accordance with the Settlement Agreement.
29. The Receiver's review of the LQM project resulted in identifying a further six invoices with an aggregate value of \$563,433 which had been submitted for payment to LQM by KCC on October 4, 2023. The Receiver is of the view that these six invoices were not included in the Settled Invoices, and therefore reforwarded these invoices for payment to LQM on January 26, 2024.
30. Through its legal counsel, LQM responded to the Receiver's demand denying that any amounts are owed to KCC and making a counterclaim in the approximate amount of \$1,400,000 stemming from project delays and for estimated costs to complete the project. The Receiver was provided with an affidavit sworn by Gary Mathiesen, CEO of LQM, dated May 16, 2024, which outlines the additional costs incurred by LQM as a result of KCC's inability to complete the project. Gary Mathiesen's affidavit includes exhibits with invoices or contracts as support for the costs incurred by various

subcontractors engaged to complete the work under the contract after the Receivership Order was entered.

31. LQM's submission includes that its costs to complete the project and correct deficient work completed by KCC total \$1,970,949, being \$997,582 more than the budgeted costs under the CCDC2 contract between LQM and KCC. Further, LQM has asserted damages caused by Klondike from loss of rental revenue due to project delays and credits that were agreed by KCC to be applied to future invoices. The Receiver is in the process of reviewing these offsetting claims from LQM.
32. In addition to the above, LQM has made an application to Court to pay \$521,008.12, representing 10% of the adjusted contract value (the "**Lien Funds**") into Court for benefit of lien claimants and to discharge its holdback liability to the subcontractors. The total value of liens filed by unpaid subcontractors related to the LQM project is \$2,110,861.15, which includes a lien filed by FBS prior to the Receivership in the amount of \$371,610.35. The Receiver will make an application to claim its entitlement to a share of the Lien Funds on behalf of FBS once the Lien Funds have been paid into Court.

#### BC Housing

33. BC Housing and KCC entered into a contract in the form of a CCDC 5B in May of 2023. A CCDC 5B contract is commonly used in construction projects between the project owner and the construction manager whereby the construction manager is entitled to bill the project owner for the cost of the work plus the agreed upon mark up percentage and may also include a smaller fixed fee. The contract between BC Housing and KCC included that the fixed fee payable to KCC is \$5,000 in addition to a 1.98% mark up applied to the construction costs arranged and incurred by KCC.
34. The Receiver reviewed the KCC bank statements and identified three payments related to this project and received from BC Housing which total \$761,067 on account of three invoices issued by KCC with dates ranging between June 16, 2023 and August 31, 2023. The work included in these invoices and submitted to BC Housing was documented through change orders. The Receiver reviewed the change orders and noted that they were signed after the work included in the change orders had already begun. It appears that the change orders did not operate as an approval process for work to be undertaken by KCC, but rather as a means to document the work which was currently underway or had already been completed by KCC.
35. The Receiver inquired with Management as to status of the BC Housing project. Management reported that the final billing for the BC Housing project had not yet been completed. Further, Management reported that BC Housing had expressed ongoing pressure for KCC to complete this project despite the project drawings and overall full scope of work not being determined even up to the time of the Receivership Order. Therefore, it was Management's view that as a result to the urgency on this project the

ongoing work had continued to be authorized verbally and via email, with change orders drafted at a later date.

36. The Receiver engaged Mr. Keith to assist with the preparation of the final invoice related to the BC Housing project. Mr. Keith prepared two invoices in addition to the three invoices previously issued and paid under the BC Housing Project. The total of these two additional invoices is \$2,198,312 (jointly the “**Final Invoices**”). The Receiver’s understanding is that these costs were not previously invoiced by KCC.
37. The Receiver reviewed the Final Invoices, determined them to be reasonably supported, and submitted same to BC Housing for payment. The Receiver and BC Housing are in the process of corresponding on the Final Invoices submitted by the Receiver. The issues raised by BC Housing in regard to this account include:
  - (a) offsetting claims related to correction of deficiencies and the ability to claim these offsets without a scope of work being completed;
  - (b) overpayment related to work claimed on the initial three KCC invoices;
  - (c) approval of the work claimed to be completed by KCC;
  - (d) validity of construction costs included in the invoices and the supporting documents to confirm the same; and
  - (e) current invoiced costs exceeding adjusted contract price as amended per the previous change orders.
38. The Receiver is in the process of obtaining additional backup from material suppliers specific to the BC Housing project which we expect will assist with resolving the above noted issues related to the BC Housing account.
39. The Receiver has requested that Zee Electrical Ltd. and Ange’s Plumbing Ltd. each provide the following information specific to the BC Housing project:
  - (a) Copies of relevant contracts;
  - (b) Copies of all invoices issued to KCC for work performed prior to the Receivership;
  - (c) A summary of work undertaken, and materials delivered to the job site with documents to confirm delivery of same;
  - (d) A summary of payments received from KCC; and
  - (e) A summary of payments received by any other party related to work undertaken and goods that were supplied at the request of KCC.

40. The Receiver is seeking an Order from this Honourable Court directing Zee Electrical Ltd. and Ange's Plumbing Ltd. to provide the Receiver with the requested information as it will allow the Receiver to better assess the net realization expected from this project.
41. Further, the Receiver has requested that Procore reestablish access to the KCC and FBS information which will allow for the resolution of many of the issues raised by BC Housing and provide additional support of the Final Invoices. However, such access has not been provided to the date of this report. The Receiver is seeking directions from this Honourable Court directing Procore to provide the Receiver with access to the Companies' Procore accounts to assist the Receiver in obtaining the additional backup information.

#### Khalsa

42. Khalsa and KCC entered into a construction management contract in the form of a CCDC 5B in January of 2021 and that the work was set to begin in January of 2022.

The Receiver identified four invoices which were submitted by KCC to Khalsa for payment which total approximately \$350,000 and that remain unpaid as of the Receivership. The Receiver submitted these invoices to Khalsa and demanded payment. The Receiver has continued correspondence with representatives from Khalsa regarding these unpaid invoices. Khalsa responded to the Receiver's demand and took the position that the costs to complete the project could be offset against the amounts owing to KCC. The Receiver has not yet received the details regarding the costs to complete the project and has not agreed to these offsetting costs.

43. The Receiver is seeking directions from this Honourable Court directing Khalsa to provide the Receiver with detailed information with regards to their offsetting costs claims.

#### Fraudulent Conveyance

44. The Receiver determined that KCC had leased a series of vehicles from Ensign Pacific Lease Ltd. ("**Ensign**"). The Receiver contacted Ensign to notify them of the Receivership proceedings and to evaluate whether or not the vehicles subject to the lease agreement had equity which would be for the benefit of the Receivership estate. The Receiver confirmed that the vehicles leased by KCC at the time of the Receivership did not have any equity and released its interest in those specific vehicles. However, the Receiver also confirmed that KCC had returned one of the leased trucks and sold another Company owned truck to Ensign after the Receivership Order was granted on August 24, 2023 and prior to the Receivership Order being entered on October 18, 2023.

45. A Company owned vehicle was sold to Ensign on September 29, 2023 and a leased vehicle was returned to Ensign on October 10, 2023. The value of the Company owned vehicle and the equity in the leased vehicle was applied to the balance owed by Klondike.
46. Ensign reported that prior to the two vehicle transactions described above, KCC was indebted to Ensign in the amount of \$45,455.79. And that following these transactions the debt owing to Ensign was \$10,285.24.
47. The Receiver is of the opinion that the value received by Ensign as a result of these transactions represents a fraudulent conveyance pursuant to section 1 of the *British Columbia Fraudulent Conveyance Act* in the amount of \$35,170.55. The Receiver has issued demands for payment to Ensign however, has neither received the funds, nor received a response from Ensign.
48. The Receiver is seeking an Order from this Honourable Court directing Ensign to remit \$35,170.55 to the Receiver on account of the value received by Ensign related to the fraudulent conveyance.

## PRIORITY CLAIMS

### Statutory Priority Claims

49. The CRA has submitted proofs of claim for FBS and KCC on account of unremitted GST and payroll source deductions. CRA's claims related to each Company are summarized below:

| FBS Fairview Builder Services Incorporated |                     |                    |
|--|---------------------|--------------------|
|  | Deemed Trust        | Unsecured          |
| Payroll Source Deductions                  | 112,683.57          | 72,546.44          |
| GST  | 7,895.65            | 674.49             |
|  | <b>\$120,579.22</b> | <b>\$73,220.93</b> |

| Klondike Contracting Corporation |                     |                     |
|----------------------------------|---------------------|---------------------|
|                                  | Deemed Trust        | Unsecured           |
| Payroll Source Deductions        | 125,548.06          | 62,161.63           |
| GST                              | -                   | 53,137.51           |
|                                  | <b>\$125,548.06</b> | <b>\$115,299.14</b> |

50. The Receiver filed documents in accordance with the WEPPA with Service Canada pertaining to wage arrears owing to thirteen FBS employees and twenty-eight KCC employees. The maximum amount payable to Service Canada under Section 81.4 of the BIA is \$49,468 for KCC employees and \$24,761 for FBS employees, the priority for which ranks ahead of all registered security interests in relation to each Company's current assets.
51. The British Columbia Ministry of Finance has not yet submitted a claim on account of unremitted PST. Based on the Receiver's review of the Companies' books and records, the Receiver anticipates that there is approximately \$7,500 owing in relation to unremitted PST.
52. The Receiver proposes to address distribution to these claimants, and secured creditors, at a further application to the court following the resolution of the issues pertaining to the Companies' assets.

#### **Receiver's Borrowings**

53. The Receiver is seeking approval to increase the Receiver's borrowing charge from \$100,000 as set out in the Receivership Order to \$250,000 to reflect the funding required with respect to dealing with the collection efforts of the Accounts Receivable.

#### **RECEIVER'S STATEMENT OF RECEIPTS AND DISBURSEMENTS**

54. Attached as **Appendix "A"** to this report is the Interim Receiver's Statement of Receipts and Disbursements for the period ending September 12, 2024. The Receiver holds a balance of \$36,122.52 in the Receivership trust account as of that date.

#### **FEES AND DISBURSEMENTS OF THE RECEIVER AND RECEIVER'S COUNSEL**

55. Attached hereto as **Appendix "B"** are the Receiver's invoices for professional fees from the commencement of these proceedings to August 30, 2024. As set out in that appendix, the Receiver's fees and disbursements for the applicable time period totalled \$181,275.10, before applicable taxes. All fees were charged at the Receiver's standard hourly rates from time to time.
56. Attached hereto as **Appendix "C"** is a summary of the time expended by the officers and employees of the Receiver in relation to the matters which are the subject of the Receiver's accounts which are referenced in Appendix **"B"**. As set out in Appendix **"C"**, the hours relating to the services provided by the officers and employees of the Receiver in relation to the matters dealt with in such accounts totalled 411.45 hours.

57. Attached hereto as **Appendix “D”** is the invoice for legal fees and disbursements of the Receiver’s legal counsel, DLA Piper (Canada) LLP (“**DLA**”) from the commencement of these proceedings to August 31, 2024. As set out in that appendix, the fees relating to the legal services provided by DLA during the applicable time-period totalled \$72,677.64 including disbursements. DLA has advised that all fees were charged at standard hourly rates from time to time.
58. The Receiver has reviewed the accounts of DLA rendered in this matter and is satisfied that the work detailed therein was completed by DLA was at the request of the Receiver and was necessary. In the Receiver’s experience, the fees and rates charged by DLA in those invoices are consistent with those charged by other law firms for work of a similar nature and complexity in British Columbia.

### **COURT APPROVAL SOUGHT**

59. Based on the foregoing, the Receiver seeks a Court Order:
- a) approving the Receiver’s activities to-date;
  - b) directing Zee Electrical Ltd. and Ange’s Plumbing Ltd. to provide the Receiver with the requested information;
  - c) directing Procore to provide the Receiver with access to the Companies’ Procore accounts;
  - d) directing Ensign Pacific Lease Ltd. to forward payment to the Receiver in the amount of \$35,170.55 on account of the undue preference received;
  - e) directing Khalsa to provide the Receiver with detailed and supported financial and other information with regards to their offsetting costs claims.
  - f) increasing the Receiver’s Borrowing Charge to \$250,000;
  - g) approving the Receiver’s Fees and Disbursements as set out in Appendices “**B**” and “**C**”;
  - h) approving the Receiver’s Counsel’s Fees and Disbursement as set out in Appendix “**D**”; and
  - i) approving the Receiver’s Interim Statement of Receipts and Disbursements dated September 12, 2024;

DATED Vancouver, British Columbia, this 8th day of October 2024.

**MNP Ltd.**

**In its capacity as Receiver and Manager of  
Klondike Contracting Corporation &  
FBS Fairview Builder Services Incorporated  
and not in its personal capacity**

A handwritten signature in blue ink, appearing to read 'G. Ibbott', with a stylized, flowing script.

Per: Greg Ibbott, CIRP, LIT, CPA, CA  
Senior Vice President

## **Appendix “A”**

**Klondike Contracting Corporation and FBS Fairview Builder  
Services Incorporated - In Receivership  
Interim Statement of Receipts and Disbursements  
For the Period of October 18, 2024 to September 12, 2024**

**Appendix "A"**

**Receipts**

|                                |                   |
|--------------------------------|-------------------|
| Accounts receivable            | 12,073.09         |
| Advances from Secured Creditor | 171,332.32        |
| Interest                       | 828.48            |
| Total Receipts                 | <u>184,233.89</u> |

**Disbursements**

|                           |                   |
|---------------------------|-------------------|
| OSB Filing & Other Fees   | 369.55            |
| Advertising               | 564.90            |
| GST paid on disbursements | 6,642.00          |
| Receiver's Fees           | 98,956.14         |
| Legal Fees                | 28,718.27         |
| Computer services         | 686.32            |
| Contract labour           | 12,174.19         |
| Total Disbursements       | <u>148,111.37</u> |

**Total Balance on Hand**

36,122.52

## **Appendix “B”**

November 30, 2023

Via E-mail : Taunja Byers@td.com

TD Business Bank  
421 7<sup>th</sup> Ave SW, 10<sup>th</sup> Floor  
Calgary, AB  
T2P 4K9

**Attn: Taunja Byers, Manager Commercial Credit, Financial Restructuring Group**

Dear Ms. Byers:

**Re: In the Matter of the Receivership of FBS Fairview Builder Services Incorporated  
and Klondike Contracting Corporation**

**TO ALL PROFESSIONAL FEES RENDERED** in connection with the above noted matter to and including November 15, 2023.

The following is a summary of professional fees:

|  |                            |
|--|----------------------------|
| Receiver's Fees                        | \$ 51,564.52               |
| GST on Receiver's Fees                 | <u>2,578.23</u>            |
| <b>Total Receiver's Fees and Taxes</b> | <b><u>\$ 54,142.75</u></b> |

If there are any questions, please contact me directly at (604) 637-1541.

Yours very truly,

**MNP Ltd.**

In its capacity as Receiver  
of FBS Fairview Builder Services Incorporated &  
Klondike Contracting Corporation  
and not in its corporate capacity

Per:



Greg Ibbott, CPA, CA, CIRP, LIT  
Senior Vice President

Encl.

| Date        | Description                 | Units       | Amount        | Notes  |
|-------------|-----------------------------|-------------|---------------|--|
| 03-Nov-2023 | Elizabeth Chen              | .20         | 80.40         | Correspondence with S. Boyle to pay Ads. fee, open trust account and review of same  |
| 03-Nov-2023 | Elizabeth Chen              | .20         | 80.40         | Prepare two cheque requests.   |
| 06-Nov-2023 | Elizabeth Chen              | .10         | 40.20         | Correspondence with Versabank, Set up new trust account in Ascend.   |
| 07-Nov-2023 | Elizabeth Chen              | .10         | 40.20         | Review disbursement, prepare Imprest cheque request in order to pay OR fee from estate trust account   |
| 07-Nov-2023 | Elizabeth Chen              | .20         | 80.40         | Issue cheque for Official Receiver's fees  |
| 09-Nov-2023 | Elizabeth Chen              | .20         | 80.40         | Trust accounting manage deposits from imprest account  |
| 10-Nov-2023 | Elizabeth Chen              | .20         | 80.40         | Prepare electronic banking save and review information regarding the same  |
|             | <b>Elizabeth Chen Total</b> | <b>1.20</b> | <b>482.40</b> |  |
| 18-Oct-2023 | Greg Ibbott                 | 9.40        | 6,204.00      | Aug 16 - 0.8 - Ongoing correspondence on status and issues, review of draft court order and provide comments<br>August 21 - 2.7 - Review application affidavits and materials, review PPR results, discussion on related issues<br>Aug 22 - 0.6 - Correspondence with bank and legal on status and engagement documents<br>Oct 17 1.6 - Correspondence and discussion on status, review registrations, correspondence with legal, directions on next steps for preparing for entered order<br>October 18 3.7 - Receive and review company information from bank, receive entered order, Correspondence with Reza and arrange initial call, discussion with Reza and legal counsel on status and issues, draft letter to RBC to close accounts, directions on follow up email to Reza on further information required, directions on next steps |
| 19-Oct-2023 | Greg Ibbott                 | 1.20        | 792.00        | Review information from Reza, discussion and direction on various initial issues   |
| 27-Oct-2023 | Greg Ibbott                 | 1.40        | 924.00        | Correspondence on information and other, full update on various assets and issues, directions on same, discussion with legal on discussion with Tim and additional information to be obtained.   |
| 30-Oct-2023 | Greg Ibbott                 | 1.20        | 792.00        | Ongoing correspondence, discussion and direction on BC Housing project and related issues  |
| 01-Nov-2023 | Greg Ibbott                 | 2.00        | 1,320.00      | Review status of projects, call with BC Housing, update disc with legal, directions on AR  |
| 02-Nov-2023 | Greg Ibbott                 | 1.20        | 792.00        | Review AR issues and status, directions on same, review vehicle issues   |
| 03-Nov-2023 | Greg Ibbott                 | 2.40        | 1,584.00      | Review and discussion on priority claims and projects, correspondence from bank, directions on same, review and revise update to bank  |
| 07-Nov-2023 | Greg Ibbott                 | 2.30        | 1,518.00      | Review demand email to Reza and Tim, revisions to same, direction on next steps  |

| Date        | Description                 | Units        | Amount           | Notes   |
|-------------|-----------------------------|--------------|------------------|---|
| 08-Nov-2023 | Greg Ibbott                 | 1.60         | 1,056.00         | Review of employee / WEPPA issues, discussion on issues with Tim, directions on same, discussion with Tim's legal, review access to information |
| 09-Nov-2023 | Greg Ibbott                 | 1.20         | 792.00           | Correspondence and discussion on status of assets, discussion and directions on AR issues   |
| 10-Nov-2023 | Greg Ibbott                 | 1.20         | 792.00           | Prepare for and chair update call with bank, directions on next steps   |
| 14-Nov-2023 | Greg Ibbott                 | .90          | 594.00           | Follow up with Helen on asset issues, discussion with legal on BC Housing issues  |
|             | <b>Greg Ibbott Total</b>    | <b>26.00</b> | <b>17,160.00</b> |   |
| 18-Oct-2023 | Heather Ursaki              | .20          | 39.40            | Create client code; corporate search for GI   |
| 23-Oct-2023 | Heather Ursaki              | .10          | 19.70            | Correspondence with OSB w/Rec Order; correspondence with newspaper re placing notice  |
| 24-Oct-2023 | Heather Ursaki              | 1.10         | 216.70           | Correspondence with newspaper w/notice approval; prepared & emailed AR letters  |
|             | <b>Heather Ursaki Total</b> | <b>1.40</b>  | <b>275.80</b>    |   |
| 26-Oct-2023 | Julia Noort                 | 3.00         | 735.00           | Estate administration relating to the set up of creditors, Ascend and mailout.  |
| 30-Oct-2023 | Julia Noort                 | 2.40         | 588.00           | Estate administration related to create and publish the website. Various correspondence with creditors. Update the service list.                |
| 01-Nov-2023 | Julia Noort                 | .50          | 122.50           | Swear mailing affidavit. Correspondence to OSB to request correction on certificates.   |
| 07-Nov-2023 | Julia Noort                 | .10          | 24.50            | Update service list.  |
|             | <b>Julia Noort Total</b>    | <b>6.00</b>  | <b>1,470.00</b>  |   |
| 08-Nov-2023 | Michael Tian                | 5.00         | 2,010.00         | Complete WEPP documents , Proof of Filing, Employee Letters for both companies.   |
| 09-Nov-2023 | Michael Tian                | 4.00         | 1,608.00         | Respond to inquiries from various employees about EIF/Proof of Filing/Employee letters, including disputes.                                     |
| 10-Nov-2023 | Michael Tian                | 3.50         | 1,407.00         | Answer WEPP questions from employees, file amendments and organize filing information.  |
| 14-Nov-2023 | Michael Tian                | 3.00         | 1,206.00         | Answer various employee questions from FBS and Klondike upon sending EIF/Employee Letters/Form 31-36.   |
| 15-Nov-2023 | Michael Tian                | 1.00         | 402.00           | Answer employee disputes about unpaid wages/vacation/termination pay and filing amended POCs for employees that returned Form 31-36.            |
|             | <b>Michael Tian Total</b>   | <b>16.50</b> | <b>6,633.00</b>  |   |

| Date        | Description                | Units       | Amount        | Notes   |
|-------------|----------------------------|-------------|---------------|---|
| 18-Oct-2023 | Sameer Kassam              | 2.75        | 877.25        | Attend client site and took photos to confirm that the building was vacant  |
|             | <b>Sameer Kassam Total</b> | <b>2.75</b> | <b>877.25</b> |   |
| 18-Oct-2023 | Seamus Boyle               | 3.00        | 1,350.00      | Initial call with Director, make arrangements for site visit, draft employee letter, provide update to TD, review of various items and initial receivership duties, correspondence with factoring company   |
| 18-Oct-2023 | Seamus Boyle               | 4.10        | 1,845.00      | Aug 9 :Prepare for and attend call with TD and counsel re: Klondike Construction , prepare consent to act, Aug 10: Finalize consent to act and provide to Counsel for TD , Aug 16: Review draft court order and correspond with DLA re: clearing conflicts, Aug 21: Draft engagement letter , Aug 31: Review of correspondence from S. Stephen re: negotiation with company , Oct 17:Call with TD, discussion on initial issues, save initial documents, update email to legal counsel , correspondence with team re: initial duties and site visit |
| 19-Oct-2023 | Seamus Boyle               | 3.00        | 1,350.00      | Correspondence with factoring company, respond to director, provide direction to Company's former legal counsel re: ongoing projects, request information from accounting, provide notice to employees, prepare for and chair employee meeting, calls with legal counsel, call to leasing co,   |
| 20-Oct-2023 | Seamus Boyle               | 3.00        | 1,350.00      | Various calls to Spectrum re: access to cloud accounting, call with united workforce re: settlement agreement, review of documents provided by Klondike former legal counsel re: LQM project and Khalso credit union project, review of financial systems, begin review AR, call with Lonsdale Quay Legal Counsel   |
| 23-Oct-2023 | Seamus Boyle               | 4.70        | 2,115.00      | Respond to creditor and employee inquiries , review of payroll data, prepare contractor agreement for Solmaz Hezarkhani, correspondence with Superintendent re: equipment location, prepare notice for newspaper, prepare client acceptance documents, continue review of AR, call with TD, call with Tim Keith, prepare summary of AR, respond to BC Housing request for meeting   |
| 24-Oct-2023 | Seamus Boyle               | 4.00        | 1,800.00      | Continues review of AR and related issues, review termination notices, review AR demand letters, review of estimated vehicle values and equity assessment, call with former legal counsel, review of payroll and deemed trust, correspondence with various parties re: termination of contracts and AR disputes, correspondence with IT provider re: back up of information   |
| 25-Oct-2023 | Seamus Boyle               | 4.50        | 2,025.00      | Review of payroll and deemed trust calculation, provide update to TD, correspondence with various account re: outstanding AR, deal with IT manager re: securing documents, correspondence with S. Herarkhani re: October invoices and AP listing, respond to inquiry from Employment Standards Branch, discussion with Legal re: litigation matters with previous counsel, correspondence with T. Keith re: payments to employees, company assets   |
| 26-Oct-2023 | Seamus Boyle               | 2.80        | 1,260.00      | Review of Company SharePoint records , discussion with legal counsel re: litigation strategy, begin review of trade AP by job , prepare notice of statement of receiver and coordinate filing of same, attend to questions of employees   |
| 27-Oct-2023 | Seamus Boyle               | 3.00        | 1,350.00      | Correspondence with various creditors, and AR balances, call with Tim Keith re: proposal for BC housing AR balance and discussion with legal on same, continue review of trade AP by job, review details of vehicles return   |

| Date        | Description  | Units | Amount   | Notes  |
|-------------|--------------|-------|----------|--|
| 30-Oct-2023 | Seamus Boyle | 2.00  | 900.00   | Review of procore system for BC Chalmers project, request meeting with BC Housing respond to creditors, correspondence with ADP re: payroll records , review Delage Landen lease agreement   |
| 31-Oct-2023 | Seamus Boyle | 2.00  | 900.00   | Prepare WEPP calculations, correspondence with Tim Keith re: proposal, review of details of construction bonds, prepare for BC housing meeting   |
| 01-Nov-2023 | Seamus Boyle | 2.00  | 900.00   | Prepare for and attend call with BC Housing, review of bank statements, correspondence re: strategy for builder's lien claims, follow up with T. Keith re: payroll records, review and save ROE schedule, begin review of bank statements for FBS and KCC  |
| 02-Nov-2023 | Seamus Boyle | 2.00  | 900.00   | Call with D. Burma from Ensign Leases, review of return of leased vehicles, provide update to legal counsel, draft letter to RBS re: cash in bank and follow up call, discussion with Johnson Controls re: status of Emily carr university job and mega cranes balance owing, respond to various inquires of creditors and AR responses, review of issue with transfer of vehicle equity, discussion re: strategy for AR and impact on builder's liens |
| 03-Nov-2023 | Seamus Boyle | 4.50  | 2,025.00 | Request details from Khalso credit union, review details from Hudson Bay Mountain Estates, review notice from E. Shapira and Kuhn LLP, call with RBC re: funds in account ,respond to creditor questions re: claims process, begin review of BC housing contract and LQM settlement agreement, prepare update to TD, provide direction re ROEs, review of WEPP request information regarding same  |
| 06-Nov-2023 | Seamus Boyle | .80   | 360.00   | Respond to creditor inquiries, discussion re: AR recovery strategy and demand for information, update to TD, review of ROEs, review of Govan Brown AR account  |
| 07-Nov-2023 | Seamus Boyle | 3.00  | 1,350.00 | Prepare demand for information to R. Moshenpour and T. Keith, call with R. Pollard re: status of receivership, discussion with J. Bradshaw re requirement to notify subtrades of termination, trace payments from customers to bank statements, correspondence with BC housing re: payment confirmations, respond to D. Bell from Clark Wilson re: Consent Order re: BA Black top, provide direction re: WEPP notices to employees                     |
| 08-Nov-2023 | Seamus Boyle | 2.30  | 1,035.00 | Review and respond to email from United rentals re: rented assets consider length of rental agreements, request summary, respond to query of former employee, review employee listing for wepp filing and provide direction re: WEPP filing, call to creditors re: unpaid invoices and ability to file liens, review of LQM settlement agreement and certificates for payment, review or Liquor distribution board notice of petition to release funds |
| 09-Nov-2023 | Seamus Boyle | 1.40  | 630.00   | Review LQM invoicing with G. Ibbot and discussion on same, correspondence with H. Sevenoaks re: information request, respond to employee and creditor inquiries  |
| 10-Nov-2023 | Seamus Boyle | 1.25  | 562.50   | Call with TD and preparation regarding the same, respond to employee WEPP disputes, review correspondence from BC housing re: replacement contractor   |
| 14-Nov-2023 | Seamus Boyle | .40   | 180.00   | Respond re: employee disputes and creditor queries, respond re: legal action against companies and stay of proceedings, save ADP employee information  |

| Date        | Description                         | Units        | Amount           | Notes   |
|-------------|-------------------------------------|--------------|------------------|---|
| 15-Nov-2023 | Seamus Boyle                        | .50          | 225.00           | Provide direction re: employee claim for unpaid wages, respond to tursa group re: Klondike webpage, review of time and material billing history for Keith and Sons projects |
|             | <b>Seamus Boyle Total</b>           | <b>54.25</b> | <b>24,412.50</b> |   |
| 26-Oct-2023 | Disbursements                       |              | 32.98            | 17 packages x 1.94 Canadian postage for mailing creditor's package  |
| 26-Oct-2023 | Disbursements                       |              | 110.50           | 13 pages x \$0.5/page x 17 packages (printing for creditor's package mailout)   |
| 24-Oct-2023 | Disbursements                       |              | 54.68            | 2023-10-24 / Samir Kassam / Uber to visit Klondike and FBS site   |
| 24-Oct-2023 | Disbursements                       |              | 55.41            | 2023-10-24 / Samir Kassam / Uber to come back to MNP from Klondike and FBS site   |
|             | <b>Total Disbursements</b>          |              | <b>253.57</b>    |   |
|             | <b>Total Fees and Disbursements</b> | <b>108.1</b> | <b>51,564.52</b> |   |



March 19, 2024

Via E-mail : Taunja Byers@td.com

TD Business Bank  
421 7<sup>th</sup> Ave SW, 10<sup>th</sup> Floor  
Calgary, AB  
T2P 4K9

**Attn: Taunja Byers, Manager Commercial Credit, Financial Restructuring Group**

Dear Ms. Byers:

**Re: In the Matter of the Receivership of FBS Fairview Builder Services Incorporated  
and Klondike Contracting Corporation**

**TO ALL PROFESSIONAL FEES RENDERED** in connection with the above noted matter for the period of November 16, 2023 until February 29, 2024.

The following is a summary of professional fees:

|  |                            |
|--|----------------------------|
| Receiver's Fees                        | \$ 73,513.88               |
| GST on Receiver's Fees                 | <u>3,675.69</u>            |
| <b>Total Receiver's Fees and Taxes</b> | <b><u>\$ 77,189.57</u></b> |


If there are any questions, please contact me directly at (604) 637-1541.

Yours very truly,

**MNP Ltd.**

In its capacity as Receiver  
of FBS Fairview Builder Services Incorporated &  
Klondike Contracting Corporation  
and not in its corporate capacity

Per:

  
Greg Ibbott, CPA, CA, CIRP, LIT  
Senior Vice President

Encl.

MNP LTD

Suite 1630-609 Granville Street, PO Box 10203 LCD Pacific Centre, Vancouver B.C., V7Y 1E7

T: 604.689.8939 F: 604.689.8584

| Date        | Description    | Units | Amount | Notes  |
|-------------|----------------|-------|--------|--|
| 16-Nov-2023 | Elizabeth Chen | .20   | 80.40  | Receive a signed cheque, update accounts, distribute cheque.   |
| 16-Nov-2023 | Elizabeth Chen | .10   | 40.20  | Trust accounting, prepare cheque for newspaper advertisement.  |
| 13-Dec-2023 | Elizabeth Chen | .10   | 40.20  | Correspondence with S. Boyle re: payment of OR fee.  |
| 14-Dec-2023 | Elizabeth Chen | .10   | 40.20  | Correspondence with S. Boyle re request fund from MNP Ltd Finance.   |
| 20-Dec-2023 | Elizabeth Chen | .40   | 160.80 | Exchange email with Nadine at MNP Ltd Finance and Exchange email with Raymond. Prepare trust accounting, review deposits.        |
| 21-Dec-2023 | Elizabeth Chen | .30   | 120.60 | Conversation with G. Ibbott regarding loan fund from Imprest Account. Correspondence with S. Boyle, prepare two cheque requests. |
| 21-Dec-2023 | Elizabeth Chen | .20   | 80.40  | Post deposit and issue a trust cheque.   |
| 22-Dec-2023 | Elizabeth Chen | .10   | 40.20  | Review Imprest Account balance, and correspondence with S. Boyle regarding the same.   |
| 22-Dec-2023 | Elizabeth Chen | .20   | 80.40  | Handle funds advanced, prepare deposit.  |
| 22-Dec-2023 | Elizabeth Chen | .30   | 120.60 | Correspondence with S. Boyle. Review CIBC info, Prepare outgoing wire payment request, scan and email request to S. Boyle.       |
| 22-Dec-2023 | Elizabeth Chen | .20   | 80.40  | Correspondence with S. Boyle, issue request to Versbank for outgoing wire payment.   |
| 27-Dec-2023 | Elizabeth Chen | .30   | 120.60 | Correspondence with S. Boyle and Versabank re: confirmation of wire payment.   |
| 27-Dec-2023 | Elizabeth Chen | .20   | 80.40  | Receive wire payment confirmation, and prepare trust accounting.   |
| 28-Dec-2023 | Elizabeth Chen | .20   | 80.40  | Correspondence with versabank re: cashed cheque and confirmation to S. Boyle.  |
| 03-Jan-2024 | Elizabeth Chen | .10   | 40.20  | Receive an email from S. Boyle, provide wire instructions.   |
| 05-Jan-2024 | Elizabeth Chen | .10   | 40.20  | Review November banking and GL.  |
| 08-Jan-2024 | Elizabeth Chen | .10   | 40.20  | Correspondence with Versabank and S. Boyle re: Wire from TD.   |
| 09-Jan-2024 | Elizabeth Chen | .20   | 80.40  | Receive an email from Versabank. Post wire transfer, Correspondence with S. Boyle re coding.                                     |

| Date                        | Description    | Units       | Amount          | Notes  |
|-----------------------------|----------------|-------------|-----------------|--|
| 09-Jan-2024                 | Elizabeth Chen | .20         | 80.40           | Review disbursement, prepare two cheque requests.  |
| 09-Jan-2024                 | Elizabeth Chen | .20         | 80.40           | Issue trust cheques. Post deposit in Imprest Account.  |
| 09-Jan-2024                 | Elizabeth Chen | .10         | 40.20           | Sent an mail to Raymond re reimbursement cheque of \$2,500 advanced from MNP Ltd Finance (head office), copied the same to Michelle. |
| 10-Jan-2024                 | Elizabeth Chen | .10         | 40.20           | Receive an email from S. Boyle, review two invoices, and prepare a cheque request.   |
| 16-Jan-2024                 | Elizabeth Chen | .20         | 80.40           | Receive a cheque from S. Boyle, post deposit, scan banking deposit to the bank.  |
| 26-Jan-2024                 | Elizabeth Chen | .10         | 40.20           | Post deposit, scan bank deposit to Versabank.  |
| 29-Jan-2024                 | Elizabeth Chen | .10         | 40.20           | Run Ascend report, Sent an email to Seamus re receipt on Jan 16th, receive an email from S. Boyle and update allocation.             |
| 30-Jan-2024                 | Elizabeth Chen | .10         | 40.20           | Prepare monthly bank rec for Dec/23.   |
| 05-Feb-2024                 | Elizabeth Chen | .10         | 40.20           | Review December bank statement and GL.   |
| 07-Feb-2024                 | Elizabeth Chen | .10         | 40.20           | Post banking deposit.  |
| 08-Feb-2024                 | Elizabeth Chen | .10         | 40.20           | Prepare a cheque request for three invoices.   |
| 09-Feb-2024                 | Elizabeth Chen | .10         | 40.20           | Issue a cheque.  |
| 22-Feb-2024                 | Elizabeth Chen | .10         | 40.20           | EF Seamus, prepare a cheque request.   |
| 23-Feb-2024                 | Elizabeth Chen | .10         | 40.20           | Issue a trust cheque.  |
| 26-Feb-2024                 | Elizabeth Chen | .10         | 40.20           | Prepare monthly bank rec for Jan/24.   |
| 28-Feb-2024                 | Elizabeth Chen | .10         | 40.20           | Receive signed cheque, prepare a trust cheque mail out.  |
| <b>Elizabeth Chen Total</b> |                | <b>5.30</b> | <b>2,130.60</b> |  |

| Date        | Description | Units | Amount   | Notes   |
|-------------|-------------|-------|----------|---|
| 16-Nov-2023 | Greg Ibbott | 2.20  | 1,276.00 | Prepare for call with Tim on assistance on BC Housing invoicing and other issues, directions on same, follow up on vehicles.                        |
| 27-Nov-2023 | Greg Ibbott | 1.40  | 812.00   | Correspondence with T. Keith's legal counsel.   |
| 04-Dec-2023 | Greg Ibbott | 1.20  | 696.00   | Review status of various projects.  |
| 05-Dec-2023 | Greg Ibbott | 1.60  | 928.00   | Review correspondence with Tim on various issues, review correspondence with various projects, review and amend update to Bank, directions on same. |
| 06-Dec-2023 | Greg Ibbott | 1.20  | 696.00   | Finalize update to Bank, review updated correspondence from T. Keith.   |
| 15-Dec-2023 | Greg Ibbott | .80   | 464.00   | Discussion with Mr. Keith's legal counsel, directions on next steps.  |
| 18-Dec-2023 | Greg Ibbott | 1.20  | 696.00   | Review status of collections, review and amend update to Bank on same.  |
| 19-Dec-2023 | Greg Ibbott | 1.20  | 696.00   | Review status of various project collections, directions on same.   |
| 05-Jan-2024 | Greg Ibbott | .80   | 464.00   | Ongoing correspondence and payments processing.   |
| 08-Jan-2024 | Greg Ibbott | .30   | 174.00   | Review of status and directions on next steps.  |
| 16-Jan-2024 | Greg Ibbott | .80   | 464.00   | Review of status on claims, directions on same.   |
| 17-Jan-2024 | Greg Ibbott | .30   | 174.00   | Review issues with legal.   |
| 18-Jan-2024 | Greg Ibbott | .60   | 348.00   | Review legal update.  |
| 31-Jan-2024 | Greg Ibbott | 1.20  | 696.00   | Prep for and participate in call with legal on status and expectations on various claims for projects.  |
| 07-Feb-2024 | Greg Ibbott | 1.20  | 696.00   | Review LQM and updated BC Housing claim.  |
| 09-Feb-2024 | Greg Ibbott | .80   | 464.00   | Review issues with updated BC Housing invoice.  |
| 13-Feb-2024 | Greg Ibbott | .90   | 522.00   | Review BC Housing invoicing with T. Keith.  |
| 16-Feb-2024 | Greg Ibbott | .60   | 348.00   | Further correspondence and disc on BC Housing issues.   |

| Date        | Description                  | Units        | Amount           | Notes  |
|-------------|------------------------------|--------------|------------------|--|
| 26-Feb-2024 | Greg Ibbott                  | .80          | 464.00           | Prep and participate in call with BC Housing legal.  |
|             | <b>Greg Ibbott Total</b>     | <b>19.10</b> | <b>11,078.00</b> |  |
| 22-Nov-2023 | Heather Ashrose              | .10          | 19.70            | Perform Land title search.   |
| 24-Nov-2023 | Heather Ashrose              | .10          | 19.70            | Perform updated Land title search.   |
| 05-Dec-2023 | Heather Ashrose              | .10          | 19.70            | Perform updated Land title search.   |
| 14-Dec-2023 | Heather Ashrose              | .10          | 19.70            | Perform updated Land title search.   |
|             | <b>Heather Ashrose Total</b> | <b>.40</b>   | <b>78.80</b>     |  |
| 16-Nov-2023 | Michael Tian                 | 2.50         | 872.50           | File WEPPs submissions. Discussion with Solmaz about several employee disputes on wages/vacation/termination.  |
| 17-Nov-2023 | Michael Tian                 | 1.25         | 436.25           | File amendment to POC for Obinna and discussing Lauren and Luis' wages/vacation/termination with Solmaz.   |
| 20-Nov-2023 | Michael Tian                 | .60          | 209.40           | Call to CRA regarding RT0002.  |
| 21-Nov-2023 | Michael Tian                 | 1.00         | 349.00           | Update amended to POC and WEPP submissions. Follow up call to CRA about RT0002.  |
| 22-Nov-2023 | Michael Tian                 | 1.25         | 436.25           | Correspondence with Solmaz on several employee WEPP disputes. Correspondence with employees on WEPP questions.   |
| 23-Nov-2023 | Michael Tian                 | 3.00         | 1,047.00         | Follow up with Wainer, speaking to Solmaz about Luis and Lauren, update WEPP amendment for several Klondike employees, send Luis finalized forms. Answering queries from Sony, Lauren and Julie. |
| 27-Nov-2023 | Michael Tian                 | 1.50         | 523.50           | Meeting with Konstantin, Klondike employee, address queries and respond to various employee questions. Draft Letter to CRA regarding access.   |
| 28-Nov-2023 | Michael Tian                 | 2.25         | 785.25           | Filing WEPP - Julie Billing and Lauren McAree EIF/Employee Letter/Form 31-36 , Wainer's amended to POC. Misc employee questions. Review status of CRA accounts.                                  |
| 29-Nov-2023 | Michael Tian                 | 1.00         | 349.00           | Follow up with CRA on RT0002, calling CRA about payroll accounts.  |

| Date        | Description  | Units | Amount   | Notes   |
|-------------|--------------|-------|----------|---|
| 30-Nov-2023 | Michael Tian | 4.60  | 1,605.40 | Invoice compilation for BC Housing and discussion with Seamus on approach. EIF amended to POC for Lauren, Julie, Hiber. CRA access for RT0002.  |
| 01-Dec-2023 | Michael Tian | 3.50  | 1,221.50 | BC Housing invoice summarization. Correspondence with Steve Seaborn and Steve Calvert regarding WEPP.   |
| 04-Dec-2023 | Michael Tian | 1.00  | 349.00   | Addition of creditors and address of unresponsive employees and review of payment approvals. Discussion of identified discrepancies in payment approval from Service Canada.  |
| 05-Dec-2023 | Michael Tian | 3.00  | 1,047.00 | S. Seaborn correspondence and amendment to POC EIF for D. Elhafidhi. Discussion about Employment and Social Development Canada call. Correspondence regarding CRA request on F. Ethan's information. Discussion of circumstances regarding T. Metzmeier's missed payments. GST filings RT0002.          |
| 06-Dec-2023 | Michael Tian | 2.00  | 698.00   | S. Seaborn - employee termination dispute and recalculation. Update of creditor list and correspondence with new creditors added.   |
| 06-Dec-2023 | Michael Tian | 1.50  | 523.50   | Call to CRA regarding payroll audit and preparation of T4s.   |
| 07-Dec-2023 | Michael Tian | 3.00  | 1,047.00 | Address FBS employee questions regarding WEPP status. Call with CRA regarding PST filings. Call with CRA regarding payroll info for F. Ethan. D. Wiebe vacation pay. S. Seaborn correspondence on WEPP.   |
| 08-Dec-2023 | Michael Tian | .25   | 87.25    | Amend S. Seaborn WEPP Submission.   |
| 11-Dec-2023 | Michael Tian | 2.00  | 698.00   | Contacting several employees with their ROEs. ROE and correspondence with O. Bruda on WEPP.   |
| 12-Dec-2023 | Michael Tian | 4.50  | 1,570.50 | Review BC Housing invoice supporting documents and S. Mathew inquiries.   |
| 13-Dec-2023 | Michael Tian | 1.50  | 523.50   | Correspondence with employee A. Hezarkhani re SIN issue, review of supporting payroll data and prepare D. Wiebe WEPP filing. Updating creditor list for new creditors.  |
| 14-Dec-2023 | Michael Tian | 1.25  | 436.25   | Correspondence with WorkSafeBC. Work on P. Rodriguez's WEPP payment differences, Updating creditor list for C&M Manufacturing and correspondence with creditor.   |
| 19-Dec-2023 | Michael Tian | 1.00  | 349.00   | Updating WEPP for payments received and follow up with Service Canada on incorrect amount for P. Rodriguez.   |
| 20-Dec-2023 | Michael Tian | 3.40  | 1,186.60 | Update of tracking of WEPP payments and filing EIF amendment for Y. Rodriguez. Call with Service Canada for Y. Rodriguez's payment error. Review of A. Hezarkhani's application denial. Review of all received WEPP application statuses and tracking. Review status of GST filings and update summary. |

| Date        | Description  | Units | Amount   | Notes   |
|-------------|--------------|-------|----------|---|
| 21-Dec-2023 | Michael Tian | .40   | 139.60   | Review of NOA and tracking filed GST returns  |
| 03-Jan-2024 | Michael Tian | 3.00  | 1,047.00 | Update of creditor's list for M3 Staffing and correspondence with parties. T. Metzmeier correspondence on missing payments for WEPP. Correspondence with Service Canada and O. Madubuike and J. Valencia. Review of S. Seaborn and Solmaz's discussion over ROE and discussion over next steps. |
| 04-Jan-2024 | Michael Tian | 1.50  | 523.50   | Discussion with Seamus on ROE primary officer title and call with CRA re: T4s.  |
| 05-Jan-2024 | Michael Tian | .50   | 174.50   | S. Seaborn correspondence on WEPP and ROE.  |
| 11-Jan-2024 | Michael Tian | .50   | 174.50   | Update of WEPP payments received tracker and contacting Service Canada regarding H. Riascos.  |
| 12-Jan-2024 | Michael Tian | .25   | 87.25    | Preparation for trust exam.   |
| 15-Jan-2024 | Michael Tian | .50   | 174.50   | Correspondence with K. Kotlyarov about WEPP payment and correspondence with Service Canada.   |
| 16-Jan-2024 | Michael Tian | 2.00  | 698.00   | Compile documents for trust exam.   |
| 18-Jan-2024 | Michael Tian | .75   | 261.75   | Preparation of documents for Trust Exam and correspondence with Solmaz  |
| 26-Jan-2024 | Michael Tian | 1.75  | 610.75   | CRA discussion regarding T4 preparation and remaining GST returns. Analysis on WEPP calculation for T. Metzmeier.   |
| 29-Jan-2024 | Michael Tian | .50   | 174.50   | Analysis on WEPP calculation for T. Metzmeier and correspondence with Theo. Correspondence with CRA regarding remaining GST filings and T4 preparation.   |
| 31-Jan-2024 | Michael Tian | .50   | 174.50   | Update of priority creditors for Ministry of Finance and review of CRA NOA.   |
| 08-Feb-2024 | Michael Tian | 1.25  | 436.25   | Discussion on approach for BC Housing invoice. Review of BC Housing invoice prepared by T. Keith  |
| 09-Feb-2024 | Michael Tian | 1.00  | 349.00   | Call to CRA regarding preparation of T4s. Update of POCs from employees and correspondence with T. Metzmeier for amendments.  |
| 12-Feb-2024 | Michael Tian | .40   | 139.60   | Review supporting documents and update of POC - United Rentals  |
| 16-Feb-2024 | Michael Tian | .30   | 104.70   | Update of T. Metzmeier amendment to POC and correspondence re: WEPP submission  |
| 22-Feb-2024 | Michael Tian | 6.00  | 2,094.00 | Preparation of T4s.   |

| Date        | Description               | Units        | Amount           | Notes   |
|-------------|---------------------------|--------------|------------------|---|
| 23-Feb-2024 | Michael Tian              | 4.25         | 1,483.25         | Kenneth Pinacie ROE and T4 preparation for former employees.  |
| 26-Feb-2024 | Michael Tian              | 1.70         | 593.30           | Update of SIN for several employees in preparation of T4. T4 update.  |
| 27-Feb-2024 | Michael Tian              | .75          | 261.75           | Call to CRA for web access code for filing T4s. Correspondence with several former employees about payroll inquiries.   |
| 28-Feb-2024 | Michael Tian              | .25          | 87.25            | WEPP discussions with K. Osing.   |
|             | <b>Michael Tian Total</b> | <b>74.90</b> | <b>26,140.10</b> |   |
| 15-Nov-2023 | Seamus Boyle              | .50          | 225.00           | Provide direction re: employee claim for unpaid wages, respond to tursa group re: Klondike webpage, review of time and material billing history for Keith and Sons projects   |
| 16-Nov-2023 | Seamus Boyle              | 2.00         | 900.00           | Review WEPP issues and provide direction on employee queries, review and save notice from Ministry of finance re: PST account closure , prepare for and attend meeting with T. Keith  |
| 17-Nov-2023 | Seamus Boyle              | 1.20         | 540.00           | Respond to various creditor inquiries, review summary of BC Housing unpaid invoices prepared by T. Keith  |
| 20-Nov-2023 | Seamus Boyle              | .70          | 315.00           | Review various employee queries and payroll documents and respond re: termination pay entitlement and wages returned for non sufficient funds, provide additional notice to CRA re: receivership  |
| 21-Nov-2023 | Seamus Boyle              | .40          | 180.00           | Correspondence with CRA re: opening accounts, review of employee wepp claim disputes  |
| 22-Nov-2023 | Seamus Boyle              | 1.40         | 630.00           | Correspondence with Solmaz re: ROEs and contractor fee, review of employee WEPP calculation disputes and respond regarding the same, review land titles search for Emily Carr project and correspondence to owner regarding the same  |
| 23-Nov-2023 | Seamus Boyle              | 1.90         | 855.00           | Review supporting documents for lien claimants and correspondence regarding the same, prepare summary and calculation for Emily Carr University Recovery, call with lien claimants legal counsel, call to CRA re ROE preparation, follow up correspondence with T. Keith re: BC housing Invoice preparation, correspondence with Specialty claims Canada re: insurance settlement |
| 24-Nov-2023 | Seamus Boyle              | 1.40         | 630.00           | Review Employee disputes re: paycheques and ROEs, update WEPP submissions , follow up with RBC re: funds in account and statements, summarize BC Housing builder's liens to date and request land titles search on same   |

| Date        | Description  | Units | Amount   | Notes   |
|-------------|--------------|-------|----------|---|
| 27-Nov-2023 | Seamus Boyle | 1.20  | 540.00   | Call with former employee re: outstanding vacation and terms of resignation, respond to BC Housing re: process for lien claimants, request WorkSafe BC Information, review payroll documents for S. Seaborn vacation pay claim and respond regarding the same   |
| 28-Nov-2023 | Seamus Boyle | .70   | 315.00   | Respond to H. Sevenoaks re: details requested from T. Keith, provide direction re: CRA payroll audit, RBC follow up, follow up with Johnson Controls re: AR balance from Emily Carr university, review Contractor invoice and respond regarding time claimed  |
| 29-Nov-2023 | Seamus Boyle | .30   | 135.00   | Review response from Johnson controls re: settlement of lien claimants prior to payment to the Receiver.  |
| 30-Nov-2023 | Seamus Boyle | 2.50  | 1,125.00 | Provide direction on BC housing invoice summary, arrange for auction of tools and equipment, respond to Johnson Controls legal counsel re: balance of AR owing to Klondike, prepare invoicing, review Khalsa Time and materials billing, call with S. Calvert re: vacation pay owing, request vehicles details  |
| 01-Dec-2023 | Seamus Boyle | 1.70  | 765.00   | Review Steven Calvert and Steven Seaborn claims for vacation pay, provide direction re: filing WEPP claim, prepare budget for receivership, review of BC housing invoice summary and provide update on same   |
| 04-Dec-2023 | Seamus Boyle | 4.75  | 2,137.50 | Correspondence with Johnson controls legal counsel and E. Mollema re: lien amounts filed and balance to be paid into court, meeting with T. Keith and preparation for same, detailed review of BC housing prior draws and supporting schedules, discussions re: procedures for verification of prior invoices and confirmation of outstanding accounts, request vehicle information and review of same, discussion re: preference payment demands, respond to various creditor and employee queries. correspondence to legal counsel re: preferential payment   |
| 05-Dec-2023 | Seamus Boyle | 4.60  | 2,070.00 | Review of BC housing reconciliation and compare to MNP summary, respond to T. Keith proposal, Draft update to TD, provide direction re: GST filing and WEPP filing, respond to queries of creditors, correspondence with various lien claimants, correspondence with Johnson Controls Legal counsel re: settlement of lien claims, follow up with Khalsa Credit union and trace payments to TD bank statements, Trace BC, review of LQM settlement agreement and correspondence to directors re: outstanding invoices on same. Review of legal invoice, compile |
| 06-Dec-2023 | Seamus Boyle | 2.40  | 1,080.00 | Review and amend update to TD, review and amend funding requirement, review responses from T. Keith and continued analyses of BC Housing account, review TD bank statements for delay claim payment from LQM, respond to employee queries re: vacation pay, correspondence re: confirming vehicle mileage, prepare LQM invoice reconciliation for Pre and post settlement agreement   |

| Date        | Description  | Units | Amount   | Notes  |
|-------------|--------------|-------|----------|--|
| 07-Dec-2023 | Seamus Boyle | 2.40  | 1,080.00 | Prepare response to Coal Harbour Law re: summary of files and arrange for payment of same, review and summarize lien claimants and payment of settlement funds, request site activity logs, discussion re: testing procedures for site activity and LQM final invoices, provide direction re: employee claims, call with H. Sevenoaks re: T. Keith proposal  |
| 08-Dec-2023 | Seamus Boyle | 1.90  | 855.00   | Compile summary for BC housing Demand and calculate expected recovery, correspondence with D. Weibe re: vehicle mileage  |
| 11-Dec-2023 | Seamus Boyle | 1.80  | 810.00   | Edit BC Housing summary and draft correspondence to T. Keith re: proposal, review status of lien claimants, respond re: settlement offer from Liquor distribution board  |
| 12-Dec-2023 | Seamus Boyle | 2.30  | 1,035.00 | Confirm equity calculation for vehicles and follow up with DLA on preference payment demand letters, review of LQM time sheets, consider completeness of invoicing, review of Procore for missing invoices for BC housing summary, provide direction re: Finalizing claim for BC Housing, respond to creditor queries, provide direction re: WEPP notices from Service Canada, review of third party goods claim for materials on site |
| 13-Dec-2023 | Seamus Boyle | 1.90  | 855.00   | Review of lien claimants and contact of same, review of unpaid invoices and compile supporting documents for Khalsa project, respond to inquiries of employees and insurance agency re: claims process, review of claim for third party goods  |
| 14-Dec-2023 | Seamus Boyle | 2.75  | 1,237.50 | Respond to lien claimants and review of lien supporting documents, provide BC housing summary to R. Moshenpour for comments, arrange for payment of coal harbour retainer funds, prepare letter to Ensign Lease re: disclaimer of vehicles   |
| 15-Dec-2023 | Seamus Boyle | 1.40  | 630.00   | Correspondence with lien claimants re: settlement over funds paid into Court, correspondence with T. Keith re: BC Housing discussion   |
| 18-Dec-2023 | Seamus Boyle | 4.75  | 2,137.50 | Draft update to TD, review of corporate tax returns for loss carry backs, review of Ensign demand letter and provide instruction for delivery, correspondence re: Johnson Controls lien claimants, provide BC housing summary to R. Moshenpour and request comments regarding the same, review of tax implications re: transfer of tax losses between related corporations, consider acquisition of control for loss utilization       |
| 19-Dec-2023 | Seamus Boyle | 2.25  | 1,012.50 | Prepare for and attend Meeting with T. Keith, provide update to T. Keith a R. Moshenpour re: Khalsa and LQM claims   |
| 20-Dec-2023 | Seamus Boyle | 2.40  | 1,080.00 | Finalize draft to TD, call with BC Housing legal counsel, discussion re: engagement with T. Keith  |

| Date        | Description  | Units | Amount | Notes  |
|-------------|--------------|-------|--------|--|
| 21-Dec-2023 | Seamus Boyle | .75   | 337.50 | Respond to TD re funding for disbursements, respond to T. Keith re: contractor agreement and draft of same, call with RBC re: funds in bank accounts, sign cheques, issue demand to Khalsa credit union  |
| 22-Dec-2023 | Seamus Boyle | .40   | 180.00 | Prepare Receiver's certificate for funding receivership and correspondence with TD regarding the same  |
| 27-Dec-2023 | Seamus Boyle | .60   | 270.00 | Review correspondence from LQM re: scaffolding on site and respond, email to Matkana Scaffolding Inc, review correspondence from Service Canada re: updated ROE primary officers, confirm details of cheque for contractor payment and approve release of same   |
| 02-Jan-2024 | Seamus Boyle | .75   | 337.50 | Respond to Tursa Group re: maintenance of data records, follow up with T. Keith and R. Moshenpour re: LQM change order invoice and BC housing invoice, follow up re: Liquor Distribution Board AR, correspondence with P. Saini re: timeline for payment of funds into Court, provide instructions for cheque payment for AR |
| 03-Jan-2024 | Seamus Boyle | 1.00  | 450.00 | Discussion re: detailed explanation provided from T. Keith, prepare draft contractor agreement, correspondence re: receiver's certificate and funding, review of correspondence between LQM and scaffolding company re: removal of same  |
| 04-Jan-2024 | Seamus Boyle | .40   | 180.00 | Respond to LQM re: scaffolding on site, call with Service Canada re: amending ROEs   |
| 08-Jan-2024 | Seamus Boyle | .25   | 112.50 | Follow up with Khalsa credit union re: demand for payment, respond to H. Sevenoaks re: contractor agreement  |
| 09-Jan-2024 | Seamus Boyle | .10   | 45.00  | Follow up re: LQM change order, request payment of cloud back up invoices  |
| 10-Jan-2024 | Seamus Boyle | .50   | 225.00 | Review and save WEPP payment approval letters, update tracking sheet, correspondence with employee re: ROE and redraft same , respond to creditor inquiries  |
| 11-Jan-2024 | Seamus Boyle | .30   | 135.00 | Finalize amended ROE   |
| 15-Jan-2024 | Seamus Boyle | .40   | 180.00 | Respond to various creditor inquiries, provide direction re: trust audit   |
| 16-Jan-2024 | Seamus Boyle | .50   | 225.00 | Follow up with Khalsa credit union re: AR balance, review WorkSafe BC cheque and request deposit, provide direction re: CRA trust exam follow up questions, discussion re: process forward on AR collection and segregation of receipts  |
| 17-Jan-2024 | Seamus Boyle | .40   | 180.00 | Discussion with legal counsel re: claims analysis and lien claims ability for offset, respond to s. Streat from Synthesis law re: unpaid subtrades for LQM job   |
| 18-Jan-2024 | Seamus Boyle | .30   | 135.00 | Call with CRA re: trust exam and provide instruction for submitting additional documents   |

| Date        | Description  | Units | Amount | Notes   |
|-------------|--------------|-------|--------|---|
| 24-Jan-2024 | Seamus Boyle | .50   | 225.00 | Respond to S. Streat from Synthesis Law re: Receiver's process going forward, respond to Tursa Group re: data storage requirements, call with R. Pollard from Lindsay Kenney LLP, follow up with T. Keith re: progress on BC housing Invoice  |
| 25-Jan-2024 | Seamus Boyle | .10   | 45.00  | Respond to creditor inquiry   |
| 26-Jan-2024 | Seamus Boyle | 1.50  | 675.00 | Corresponded with LQM, Khalsa credit union re: status of AR and offsetting claims, correspondence with P. Saini re: status of ECUAD funds to be paid into court, review of cheque received and provide deposit instructions, provide direction re: employee request and WEPP disputes |
| 29-Jan-2024 | Seamus Boyle | .20   | 90.00  | Respond to banking re: classification of receipt  |
| 30-Jan-2024 | Seamus Boyle | .25   | 112.50 | Review procore assignment information and respond re: access following procore change   |
| 31-Jan-2024 | Seamus Boyle | .80   | 360.00 | Prepare for and attend meeting with legal counsel re: status of lien claims and priority/validity of offsetting claims  |
| 05-Feb-2024 | Seamus Boyle | .40   | 180.00 | Review correspondence from D. Shouldice re: LQM claim and discussions regarding the same, respond to employee query re: T4s   |
| 06-Feb-2024 | Seamus Boyle | .40   | 180.00 | Follow up with T. Keith re: BC housing invoice and respond to S. Mackenzie  |
| 07-Feb-2024 | Seamus Boyle | 1.70  | 765.00 | Review correspondence from D. Shouldice, correspondence with T. Keith, discussion re: strategy for collection of AR and potential legal costs, review of LQM invoice supporting documents, begin review of BC Housing Invoice provided by T. Keith                                    |
| 08-Feb-2024 | Seamus Boyle | 1.00  | 450.00 | Review of BC housing invoice and provide direction re: next steps, review computer services invoices and request payment  |
| 09-Feb-2024 | Seamus Boyle | .60   | 270.00 | Review invoice reconciliation and prepare questions for T. Keith, arrange for meeting to discuss the same   |
| 12-Feb-2024 | Seamus Boyle | .80   | 360.00 | Respond to S. Mackenzie re: BC Housing invoice, respond to Coal Harbour Law re: summary of claims, discussions re: notice of civil claim against directors  |
| 13-Feb-2024 | Seamus Boyle | 1.50  | 675.00 | Prepare for BC housing invoice discussion and meeting with T. Keith, provide BC housing invoices to R. Moshenpour for comments  |
| 14-Feb-2024 | Seamus Boyle | .25   | 112.50 | Review letter from Coal Harbour Law re: employment standards claim  |

| Date        | Description               | Units        | Amount           | Notes   |
|-------------|---------------------------|--------------|------------------|---|
| 15-Feb-2024 | Seamus Boyle              | .40          | 180.00           | Review payroll history re: Service Canada ROE request, follow up call and email to T. Keith re: supporting documents for BC housing Invoice   |
| 20-Feb-2024 | Seamus Boyle              | .40          | 180.00           | Respond to R. Moshenpour re: K. Pinnacie ROE, follow up email to T. Keith re: supporting documents for labour hours, Correspondence with J. Bradshaw re: payment of funds into court  |
| 21-Feb-2024 | Seamus Boyle              | 1.40         | 630.00           | Provide direction re: t4 preparation and tax cycle template, review filing requirements, review and save supporting documents for BC housing invoice, review and save GST notice of assessment, correspondence with BC housing legal counsel, review of contract labour invoice and request payment of same, review corresponded from A Mand re: interpretation of stay of proceedings re: claims against directors |
| 22-Feb-2024 | Seamus Boyle              | .80          | 360.00           | Final review of invoices and supporting documents submit to BC housing, correspondence with J. Bradshaw regarding the same, call to H. Sevenoakes re: Khalsa credit union action against T. Keith.  |
| 23-Feb-2024 | Seamus Boyle              | 1.00         | 450.00           | Respond to H. Sevenoakes re: Bridge Electric discovery and action against directors, provide direction re: Preparation of ROEs, respond to creditor inquiries   |
| 26-Feb-2024 | Seamus Boyle              | 2.20         | 990.00           | Respond to Reza re: preparation of T4s, meeting with S. Mackenzie counsel for BC Housing, call to CRA re: deemed trust amounts owing, follow up re: preference payment demand, prepare update to TD bank  |
| 27-Feb-2024 | Seamus Boyle              | .20          | 90.00            | Review and revise update to secured creditor, review employee standards complaint   |
| 28-Feb-2024 | Seamus Boyle              | .25          | 112.50           | Review correspondence re: settlement hearing and forward to legal counsel   |
| 29-Feb-2024 | Seamus Boyle              | .40          | 180.00           | Call to CRA re: online filing for T4s   |
|             | <b>Seamus Boyle Total</b> | <b>75.20</b> | <b>33,840.00</b> |   |
| 28-Nov-2023 | Winnie Peng               | .20          | 49.00            | Correspondence with S. Boyle re disbursements for computer service fees; prepare cheque requests  |
| 07-Dec-2023 | Winnie Peng               | .20          | 49.00            | Correspondence with S. Boyle re wire payment; prepare cheque request  |
| 08-Dec-2023 | Winnie Peng               | .20          | 49.00            | Issue loan from trustee cheque from Imprest Account as per Seamus; issue cheque to pay computer service fees  |
| 13-Dec-2023 | Winnie Peng               | .20          | 49.00            | Review disbursements; EE EC and SB re imprest account cheque  |
|             | <b>Winnie Peng Total</b>  | <b>.80</b>   | <b>196.00</b>    |   |

| Date        | Description         | Units        | Amount           | Notes  |
|-------------|---------------------|--------------|------------------|--|
| 26-Dec-2023 | Misc. Disbursements |              | 36.48            | Amount of Land Titles account used on Nov. 22 - Dec. 5/23  |
| 09-Jan-2024 | Misc. Disbursements |              | 13.90            | Purolator (inv. 455196444) courier charges for shipment from MNP Ltd. to Solmaz Hezarkhani on Dec. 22/23 |
|             | <b>Grand Total</b>  | <b>175.7</b> | <b>73,513.88</b> |  |



September 12, 2024

Invoice No: 9751  
GST No: 103697215 RT0001  
Account No: 1047691

**Financial Restructuring Group**

TD Business Bank 421  
7th Ave SW, 10th Floor  
Calgary, AB T2P 4K9

Attention: Taunja Byers, Manager Commercial Credit

**Re: In the Matter of the Receivership of FBS Fairview Builder Services Incorporated  
and Klondike Contracting Corporation (the "Companies")**

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Please find enclosed our Invoice No. 9751 for professional services rendered for the period March 1 to August 30 2024 in the amount of \$59,006.54 which we trust you will find in order.

If you have any questions or concerns, please contact us.

Yours truly,

**MNP Ltd.**

In its capacity as Receiver of  
FBS Fairview Builder Services Incorporated and Klondike Contracting Corporation

Per:

Greg Ibbott, CPA, CA, CIRP, LIT  
Senior Vice President  
Encl.

**MNP LTD**

Suite 1630-609 Granville Street, PO Box 10203 LCD Pacific Centre, Vancouver B.C., V7Y 1E7

T: 604.689.8939 F: 604.689.8584



Licensed Insolvency Trustees **MNPdebt.ca**



September 12, 2024

Invoice No: 9751  
GST No: 103697215 RT0001  
Account No: 1047691

**Financial Restructuring Group**

TD Business Bank 421  
7th Ave SW, 10th Floor  
Calgary, AB T2P 4K9

Attention: Taunja Byers, Manager Commercial Credit

**In the Matter of the Receivership of FBS Fairview Builder Services Incorporated and  
Klondike Contracting Corporation**

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**FOR ALL PROFESSIONAL FEES RENDERED** in connection with the above noted matter  
for the period March 1 to August 30 2024 as follows:

|                           |                            |
|---------------------------|----------------------------|
| PROFESSIONAL FEES         | \$ 56,196.70               |
| GST                       | 2,809.84                   |
| <b>TOTAL THIS INVOICE</b> | <b><u>\$ 59,006.54</u></b> |

MNP LTD

Suite 1630-609 Granville Street, PO Box 10203 LCD Pacific Centre, Vancouver B.C., V7Y 1E7

T: 604.689.8939 F: 604.689.8584



Licensed Insolvency Trustees MNPdebt.ca

**PROFESSIONAL FEES RENDERED** by members of the staff of MNP Ltd. for the period of March 1 to August 30 2024 as Receiver of the Companies including inter alia the following:

| DATE       | STAFF        | HOURS | FEE      | DESCRIPTION  |
|------------|--------------|-------|----------|--|
| 2024-03-01 | Seamus Boyle | 1.00  | 450.00   | Respond to employee queries re: T4 preparation, review of T4 calculations and provide direction re: filing.  |
| 2024-03-01 | Michael Tian | 4.00  | 1,396.00 | Filing individual T4s.   |
| 2024-03-04 | Greg Ibbott  | 2.10  | 1,218.00 | Review of claims and prep for update call with bank, disc with legal, directions on same.  |
| 2024-03-04 | Seamus Boyle | 2.20  | 990.00   | Review missing items re: Klondike T4s and employee correspondence , discussion re: AR process and litigation of amounts owing, review of petition re: payment of funds into court on LQM job, follow up re: preference payments and small tools and equipment. |
| 2024-03-04 | Michael Tian | 2.75  | 959.75   | Response to various T4 and WEPP inquiries. Review of filed legal claim by L. McAree.   |
| 2024-03-05 | Michael Tian | 4.00  | 1,396.00 | Response to various T4 and WEPP inquiries, L. McAree ROE issue.  |
| 2024-03-06 | Greg Ibbott  | 0.80  | 464.00   | Review of BC Housing claim and issues.   |
| 2024-03-06 | Seamus Boyle | 0.20  | 90.00    | Respond to creditor question and employee question re: T4.   |
| 2024-03-07 | Seamus Boyle | 0.40  | 180.00   | Respond to A. Mand re: action against directors, discussion re: tools, BC Housing AR , vehicles and follow up on same.   |
| 2024-03-07 | Michael Tian | 1.50  | 523.50   | Response to various T4 inquiries.  |
| 2024-03-08 | Seamus Boyle | 1.50  | 675.00   | Provide direction re: T4 and ROE questions from employees, correspondence to lien claimants re: Emily Carr AR and holdback funds, prepare S. Seaborn ROE.  |
| 2024-03-08 | Michael Tian | 2.50  | 872.50   | Amending WEPP, T4 and ROE for S. Seaborn.  |
| 2024-03-11 | Greg Ibbott  | 1.60  | 928.00   | Prepare for and participate in update to Bank, directions on same.   |
| 2024-03-11 | Seamus Boyle | 1.30  | 585.00   | Preparation and meeting with TD bank, correspondence with Emily Carr Lien claimants, follow up with S. Mackenzie re: BC housing invoice.   |
| 2024-03-11 | Julia Noort  | 0.20  | 45.00    | Various correspondence with creditor regarding unpaid invoices.  |

| DATE       | STAFF          | HOURS | FEE      | DESCRIPTION   |
|------------|----------------|-------|----------|---|
| 2024-03-11 | Michael Tian   | 0.50  | 174.50   | Various T4 requests.  |
| 2024-03-12 | Elizabeth Chen | 0.10  | 40.20    | Issue a trust cheque.   |
| 2024-03-12 | Seamus Boyle   | 0.40  | 180.00   | Correspondence with J. Bradshaw re: preservation of mediation rights and review of dispute resolution terms of contracts.   |
| 2024-03-12 | Michael Tian   | 0.75  | 261.75   | Various T4 requests. ROE preparation for L. McAree.   |
| 2024-03-13 | Seamus Boyle   | 0.70  | 315.00   | Provide direction re WEPP and ROE adjustment requests from employees, review information re: termination and resigned employees.  |
| 2024-03-13 | Michael Tian   | 1.20  | 418.80   | Review of Stephen Calvert inquiries and discussion with Seamus on approach. Review of Brennan Burgess inquiries on vacation pay and correspondence.   |
| 2024-03-14 | Michael Tian   | 0.60  | 209.40   | Various T4 requests. Correspondence with and discussion with Seamus on Nathan Muldoon's inquiry for vacation.   |
| 2024-03-18 | Seamus Boyle   | 0.90  | 405.00   | Respond to Mega Cranes Ltd, re: funds to be paid into court vs. proposed resolution, prepare amended employee ROE, prepare summary of legal fees, begin response to T. Byers, begin WIP review and prepare invoice. |
| 2024-03-18 | Michael Tian   | 3.25  | 1,134.25 | Various T4 requests. Amendment to the T4 of J. Alegria. WEPP for Stephen Calvert, including calculation for termination pay. Correspondence with Stephen on details of employment.                                  |
| 2024-03-19 | Elizabeth Chen | 0.10  | 40.20    | Scan banking posting report.  |
| 2024-03-19 | Seamus Boyle   | 1.50  | 675.00   | Prepare invoice and prepare update to TD bank, correspondence with Mega Crane and P. Saini re: ECUAD distribution proposal.   |
| 2024-03-19 | Michael Tian   | 0.70  | 244.30   | S. Calvert EIF amended to POC. T. Metzmeier WEPP update. Discussion with Seamus and correspondence with Jen from M3 Staffing.   |
| 2024-03-20 | Michael Tian   | 1.00  | 349.00   | Correspondence with Aiman, discussions with Seamus, and review of company records and records from Aiman. Calculation of amendment for T4.  |
| 2024-03-21 | Seamus Boyle   | 0.30  | 135.00   | Provide direction re: employee queries and follow up with BC housing.   |

| DATE       | STAFF          | HOURS | FEE      | DESCRIPTION  |
|------------|----------------|-------|----------|--|
| 2024-03-21 | Michael Tian   | 4.10  | 1,430.90 | Reviewing payroll records and correspondence with Nathan Muldoon over unpaid wages and vacation. Completing EIF, employee letter, POC and correspondence with Nathan. Amended to POC T. Metzmeier WEPP and correspondence with employee. Updating records of payments received by employees through WEPP. Correspondence regarding disagreement on vacation pay owing with Nathan Muldoon. Various T4 and WEPP requests. |
| 2024-03-22 | Seamus Boyle   | 0.40  | 180.00   | Review of JAW response to LQM submission, respond to actions commenced against Klondike.   |
| 2024-03-22 | Michael Tian   | 0.50  | 174.50   | Amending T4 and filing for Aiman Rasheed.  |
| 2024-03-25 | Elizabeth Chen | 0.10  | 40.20    | Prepare monthly bank rec for Feb/24.   |
| 2024-03-25 | Seamus Boyle   | 0.40  | 180.00   | Correspondence re: resolution of ECUAD AR, Respond to H. Sevenoakes re: update on file.  |
| 2024-03-26 | Elizabeth Chen | 0.10  | 40.20    | Scan Feb bank statement, run GL.   |
| 2024-03-26 | Michael Tian   | 1.00  | 349.00   | Various T4 and WEPP requests.  |
| 2024-03-27 | Seamus Boyle   | 0.50  | 225.00   | Update discussion with H. Sevenoaks re: AR collection, confirm discussion with P. Saini from McMillan re: Johnson Controls settlement.   |
| 2024-03-27 | Michael Tian   | 1.00  | 349.00   | Various T4 requests.   |
| 2024-03-28 | Seamus Boyle   | 0.40  | 180.00   | Respond to ADP re: claims process, call with P. Saini re: Johnson Controls Settlement.   |
| 2024-04-01 | Greg Ibbott    | 0.30  | 174.00   | Review status, directions on next steps.   |
| 2024-04-02 | Seamus Boyle   | 0.20  | 90.00    | Respond to Parax Construction inquiry.   |
| 2024-04-03 | Michael Tian   | 0.50  | 174.50   | Various T4 requests.   |
| 2024-04-04 | Elizabeth Chen | 0.10  | 40.20    | EF Seamus, prepare a cheque request.   |
| 2024-04-05 | Elizabeth Chen | 0.10  | 40.20    | Issue a trust cheque.  |
| 2024-04-06 | Seamus Boyle   | 0.30  | 135.00   | Review changes to proposed order to discharge liens re: ECUAD project.   |
| 2024-04-08 | Greg Ibbott    | 0.50  | 290.00   | Review of memo from Coal Harbour law.  |
| 2024-04-08 | Michael Tian   | 0.25  | 87.25    | T4 request from Diana Valencia.  |

| DATE       | STAFF          | HOURS | FEE    | DESCRIPTION   |
|------------|----------------|-------|--------|---|
| 2024-04-11 | Seamus Boyle   | 0.30  | 135.00 | Follow up with S. Mackenzie re: BC housing claim, respond to M. Dew re: trust funds pursuant to BLA, correspondence with RBC re: bank statements. |
| 2024-04-12 | Elizabeth Chen | 0.10  | 40.20  | Receive signed cheque, mail out trust cheque.   |
| 2024-04-12 | Greg Ibbott    | 0.20  | 116.00 | Correspondence and disc on status and next steps.   |
| 2024-04-16 | Seamus Boyle   | 0.40  | 180.00 | Review of draft materials for ECUAD action and respond to P. Saini.   |
| 2024-04-17 | Seamus Boyle   | 0.20  | 90.00  | Provide direction re: OSB Report.   |
| 2024-04-17 | Seamus Boyle   | 0.10  | 45.00  | Provide notice of receivership to creditor.   |
| 2024-04-17 | Michael Tian   | 1.50  | 523.50 | Various T4 related inquiries from employees. Preparation of interim report to court and interim SRD.  |
| 2024-04-18 | Seamus Boyle   | 0.20  | 90.00  | Respond to S. Streat re: action against T. Keith.   |
| 2024-04-19 | Michael Tian   | 0.40  | 139.60 | Call with CRA to discuss amendments on T4s.   |
| 2024-04-22 | Seamus Boyle   | 0.40  | 180.00 | Respond to employee query re: T4 from related company, finalize report to OSB.  |
| 2024-04-24 | Greg Ibbott    | 0.60  | 348.00 | Correspondence and disc with legal on next steps to push a resolution with BC Housing.  |
| 2024-04-24 | Seamus Boyle   | 0.40  | 180.00 | Discussion with J. Bradshaw re: outstanding items, discussions re preparing receivers report to court.  |
| 2024-04-24 | Michael Tian   | 0.50  | 174.50 | Various T4 inquiries from employees.  |
| 2024-04-29 | Seamus Boyle   | 0.20  | 90.00  | Respond to K&S employee and direct to T. Keith.   |
| 2024-04-30 | Greg Ibbott    | 0.40  | 232.00 | Disc with legal on next steps, directions on same.  |
| 2024-04-30 | Seamus Boyle   | 0.20  | 90.00  | Review amended filing material for ECUAD claims.  |
| 2024-05-03 | Seamus Boyle   | 0.20  | 90.00  | Review employee expense form for CRA and sign.  |
| 2024-05-03 | Michael Tian   | 0.50  | 174.50 | Last GST return for RT0001. Call with CRA.  |
| 2024-05-06 | Greg Ibbott    | 0.50  | 290.00 | Review update to Bank and directions on same.   |
| 2024-05-06 | Seamus Boyle   | 1.00  | 450.00 | Correspondence with CRA, draft update to TD.  |

| DATE       | STAFF          | HOURS | FEE    | DESCRIPTION  |
|------------|----------------|-------|--------|--|
| 2024-05-07 | Elizabeth Chen | 0.10  | 40.20  | Prepare monthly bank rec for Mar/24.   |
| 2024-05-09 | Elizabeth Chen | 0.10  | 40.20  | EF JN re wire transfer, Replied and copied the same to Seamus to confirm.  |
| 2024-05-09 | Julia Noort    | 0.20  | 45.00  | Estate administration related to banking matters for an inter-account transfer. Correspondence with Seamus Boyle and Elizabeth Chen regarding same.                                |
| 2024-05-10 | Greg Ibbott    | 0.40  | 232.00 | Coordinate meeting with BC Housing.  |
| 2024-05-13 | Seamus Boyle   | 0.30  | 135.00 | Review notice of application re: ECUAD AR matter, arrange meeting with BC housing legal counsel, request payment of computer back up fees.   |
| 2024-05-13 | Michael Tian   | 0.25  | 87.25  | T4 request - G. Rogers.  |
| 2024-05-14 | Elizabeth Chen | 0.10  | 40.20  | EF Seamus, prepare a cheque request.   |
| 2024-05-14 | Michael Tian   | 0.20  | 69.80  | Update of POCs.  |
| 2024-05-15 | Greg Ibbott    | 1.70  | 986.00 | Review of BC Housing summary spreadsheet, disc and directions on same.   |
| 2024-05-15 | Seamus Boyle   | 0.60  | 270.00 | Review of Liquor distribution consent order and respond to C. Brousson regarding the same, review of response from BC Housing and correspondence with T. Keith regarding the same. |
| 2024-05-16 | Elizabeth Chen | 0.10  | 40.20  | Receive a signed cheque request, issue a trust cheque.   |
| 2024-05-16 | Greg Ibbott    | 1.20  | 696.00 | Prepare for and lead call with BC Housing on their response to claim, disc with legal on same.   |
| 2024-05-16 | Seamus Boyle   | 1.60  | 720.00 | Respond to employee query re : Alison Gibson WEPP, respond to C. Brousson re: Liquor distribution board hold back , prepare for and attend call with BC housing.                   |
| 2024-05-16 | Michael Tian   | 0.50  | 174.50 | Review of trust examination results for RT0001. Calls to CRA regarding proof of claim filing expectations.   |
| 2024-05-17 | Greg Ibbott    | 1.20  | 696.00 | Summary of issues with BC Housing response.  |
| 2024-05-22 | Seamus Boyle   | 0.20  | 90.00  | Review notice from PEI insurance co re: secured claim.   |
| 2024-05-22 | Michael Tian   | 0.25  | 87.25  | WEPP updates for payments received.  |

| DATE       | STAFF          | HOURS | FEE    | DESCRIPTION   |
|------------|----------------|-------|--------|---|
| 2024-05-23 | Seamus Boyle   | 0.20  | 90.00  | Discussion re: ECUAD account and response from T. Keith re: BC Housing AR.  |
| 2024-05-24 | Elizabeth Chen | 0.10  | 40.20  | Prepare monthly bank rec for Apr/24.  |
| 2024-05-24 | Seamus Boyle   | 0.30  | 135.00 | Respond to notice from J. Fiddick and follow up with BC Housing re: change orders and offset claims.  |
| 2024-05-27 | Seamus Boyle   | 0.40  | 180.00 | Correspondence to T. Keith re: approval of work on BC housing project, respond to P. Saini re: consent to relief being sought, correspondence with Khalsa credit union re: details of offsetting claim. |
| 2024-05-28 | Elizabeth Chen | 0.20  | 80.40  | EF Seamus, review invoices, prepare two cheque requests.  |
| 2024-05-28 | Elizabeth Chen | 0.20  | 80.40  | Issue trust cheques.  |
| 2024-05-28 | Seamus Boyle   | 0.30  | 135.00 | Review of legal invoices and request payment of same.   |
| 2024-06-04 | Seamus Boyle   | 0.50  | 225.00 | Correspondence with T. Keith and respond to creditor inquiry, review employee claim and respond re: WEPP Program.   |
| 2024-06-05 | Elizabeth Chen | 0.10  | 40.20  | Run GL, and attach it with download Apr/24 statement.   |
| 2024-06-05 | Seamus Boyle   | 0.20  | 90.00  | Correspondence with P. Saini re: funds paid into court, discussion re: assistance from T. Keith.  |
| 2024-06-11 | Greg Ibbott    | 0.80  | 464.00 | Review status, disc with legal and directions on next steps.  |
| 2024-06-11 | Seamus Boyle   | 0.70  | 315.00 | Request payment of computer back up invoices , call with legal counsel re: TD action against personal real property, follow up with S. Mackenzie re: BC housing change orders and offsetting claims.    |
| 2024-06-11 | Winnie Peng    | 0.20  | 42.80  | EF SB re multiple invoices; prepare cheque request, ET SB.  |
| 2024-06-12 | Seamus Boyle   | 0.40  | 180.00 | Review and respond to email from H. Esslinger, Update service list, sign cheques.   |
| 2024-06-12 | Winnie Peng    | 0.20  | 42.80  | EF SB; prepare cheque request; issue cheque.  |
| 2024-06-12 | Michael Tian   | 0.50  | 174.50 | Correspondence with M3 Staffing regarding claims.   |

| DATE       | STAFF          | HOURS | FEE    | DESCRIPTION  |
|------------|----------------|-------|--------|--|
| 2024-06-17 | Greg Ibbott    | 0.90  | 522.00 | Correspondence from BC Housing with further information on offsetting claim, correspondence with Tim, directions on same.              |
| 2024-06-17 | Seamus Boyle   | 0.20  | 90.00  | Follow up with P. Saini re: payment of funds into court.   |
| 2024-06-19 | Winnie Peng    | 0.10  | 21.40  | Prepare invoice and cheque for mail.   |
| 2024-06-20 | Greg Ibbott    | 1.20  | 696.00 | Review issues and prepare for and lead call with Tim on various issues BC Housing pushed back on, directions on next steps.            |
| 2024-06-20 | Seamus Boyle   | 0.20  | 90.00  | Respond to De Lage Landen re: photocopier.   |
| 2024-06-21 | Seamus Boyle   | 0.20  | 90.00  | Call with J. Bradshaw re: contract approval mechanism.   |
| 2024-06-24 | Seamus Boyle   | 0.20  | 90.00  | Respond to De Lage Landen re: photocopiers.  |
| 2024-06-25 | Greg Ibbott    | 1.30  | 754.00 | Update to Bank on status of BC Housing.  |
| 2024-06-28 | Seamus Boyle   | 0.40  | 180.00 | Prepare WEPP submission for A. Gibson and respond.   |
| 2024-07-04 | Seamus Boyle   | 0.75  | 337.50 | Respond to S. Boughton re: BC housing meeting, review notice of application re: K&S Application re: Forge project.                     |
| 2024-07-05 | Michael Tian   | 0.25  | 87.25  | Process of WEPP for Allison Gibson.  |
| 2024-07-08 | Seamus Boyle   | 0.20  | 90.00  | Review legal invoice, respond to Iconix water works query re: distributions.   |
| 2024-07-09 | Elizabeth Chen | 0.10  | 40.20  | Run GL, download May statement. Finalize bank rec.   |
| 2024-07-10 | Seamus Boyle   | 0.20  | 90.00  | Review and sign bank rec.  |
| 2024-07-17 | Greg Ibbott    | 0.80  | 464.00 | Correspondence with bank, correspondence on Lonsdale application.  |
| 2024-07-19 | Greg Ibbott    | 0.90  | 522.00 | Review of status of BC Housing claim, correspondence with Mr. Keith.   |
| 2024-07-22 | Greg Ibbott    | 1.30  | 754.00 | Update disc on status, directions on CRA issues.   |
| 2024-07-22 | Seamus Boyle   | 1.00  | 450.00 | Discussion re: meeting with BC Housing, review of Lonsdale Quay application and quantify receiver's interest in funds paid into court. |

| DATE       | STAFF          | HOURS | FEE      | DESCRIPTION  |
|------------|----------------|-------|----------|--|
| 2024-07-24 | Seamus Boyle   | 1.00  | 450.00   | Respond to S. Mackenzie re: items to discuss with T. Keith and BC Housing, draft CRA admin agreement, call with J. Bradshaw re: FBS lien claim on LQM project and prepare summary regarding the same.  |
| 2024-07-25 | Greg Ibbott    | 2.20  | 1,276.00 | Prepare for and lead update disc with BC Housing and Tim Keith.  |
| 2024-07-25 | Seamus Boyle   | 1.70  | 765.00   | Review change orders and prepare for call with BC housing, call with C. Hunter re: LQM funds paid into court, call with BC Housing, discussions re: CRA priority, correspondence re: procure costs, follow up with P. Saini re: ECUAD funds paid into court. |
| 2024-07-26 | Seamus Boyle   | 1.50  | 675.00   | Prepare update to TD, review and approve application to court re: LQM paying funds into court.   |
| 2024-07-30 | Seamus Boyle   | 0.70  | 315.00   | Respond to T. Keith re: Ensign lease preference payment, review of bank statements for Ensign payment.   |
| 2024-07-31 | Seamus Boyle   | 0.60  | 270.00   | Discussions re: preference payment and LQM AR, respond to creditor inquiry.  |
| 2024-08-02 | Elizabeth Chen | 0.10  | 40.20    | Scan June statement, run GL.   |
| 2024-08-02 | Elizabeth Chen | 0.10  | 40.20    | Prepare monthly bank rec for June/24.  |
| 2024-08-02 | Greg Ibbott    | 0.80  | 464.00   | Correspondence and disc on status of various claims.   |
| 2024-08-02 | Seamus Boyle   | 0.80  | 360.00   | Call with J. Bradshaw re: fund paid into court for LQM liens, preference payment for vehicle transfer and payments to Angles plumbing.   |
| 2024-08-06 | Seamus Boyle   | 0.40  | 180.00   | Review lien cancellations and registrar certificate re: ECUAD funds paid into court, email to Procore re: access to KCC and FBS accounts.  |
| 2024-08-07 | Seamus Boyle   | 2.50  | 1,125.00 | Prepare memo on LQM issues.  |
| 2024-08-08 | Greg Ibbott    | 1.80  | 1,044.00 | Review of LQM claim issues, discussion with legal on same, directions on next steps.   |
| 2024-08-08 | Seamus Boyle   | 0.70  | 315.00   | Discussion re: funds paid into court and claims process, report to court.  |
| 2024-08-09 | Seamus Boyle   | 0.40  | 180.00   | Emails and calls with Procore re: access to back ups.  |

| DATE       | STAFF          | HOURS | FEE      | DESCRIPTION  |
|------------|----------------|-------|----------|--|
| 2024-08-12 | Seamus Boyle   | 1.20  | 540.00   | Call with J. Bradshaw re: access to supporting documents and timing of meeting with BC Housing , begin court report.   |
| 2024-08-13 | Seamus Boyle   | 3.20  | 1,440.00 | Continue draft of report to court Correspondence re: access to procure, items to include in court report, claims process for liens.  |
| 2024-08-14 | Greg Ibbott    | 1.70  | 986.00   | Review of status of LQM AR claim with legal, disc and directions on same, correspondence and disc with legal on Mr. Keiths position on further work.   |
| 2024-08-14 | Seamus Boyle   | 1.50  | 675.00   | Continue draft of receiver's report, correspondence re: BC housing account and TD CPLs on T. Keith personal residence.   |
| 2024-08-15 | Greg Ibbott    | 1.60  | 928.00   | Review information from BC Housing, correspondence with legal on LQM AR collections and lien fund issues and directions on same, review of Khalsa offsets and directions on same.  |
| 2024-08-15 | Seamus Boyle   | 0.40  | 180.00   | Correspondence re: offsetting costs , follow up with Khalsa credit union and D. Shouldice re: LQM offsetting claim.  |
| 2024-08-16 | Greg Ibbott    | 2.90  | 1,682.00 | Review issues, review and update report to court.  |
| 2024-08-16 | Seamus Boyle   | 3.00  | 1,350.00 | Continue draft report to court.  |
| 2024-08-19 | Elizabeth Chen | 0.10  | 40.20    | Prepare monthly bank rec for July/24.  |
| 2024-08-19 | Elizabeth Chen | 0.10  | 40.20    | Scan trust account statement, run GL.  |
| 2024-08-19 | Greg Ibbott    | 1.30  | 754.00   | Further draft report to court.   |
| 2024-08-20 | Greg Ibbott    | 2.30  | 1,334.00 | Review of information available, review of invoicing from subs, directions on same.  |
| 2024-08-20 | Seamus Boyle   | 2.50  | 1,125.00 | Review and update report, correspondence with C. Hunter re: Johnson controls funds, increase in borrowing , discussion re: approach for procure information and corroborating evidence from subtrades, draft letter to Ange's Plumbing re: BC housing project, review BC housing procure logs. |
| 2024-08-21 | Seamus Boyle   | 0.50  | 225.00   | Issue letters to Ange's Plumbing and draft and issue letter to Zee electric re: work performed at BC Housing jobsite.  |

| DATE       | STAFF        | HOURS         | FEE              | DESCRIPTION  |
|------------|--------------|---------------|------------------|--|
| 2024-08-22 | Greg Ibbott  | 1.20          | 696.00           | Review Johnson controls issue, complete affidavit and cover letter to court for funds held, correspondence with legal on further issues. |
| 2024-08-22 | Seamus Boyle | 0.30          | 135.00           | Review comments from Legal counsel and respond re: the same.   |
| 2024-08-22 | Julia Noort  | 0.20          | 45.00            | Organize courier.  |
| 2024-08-23 | Michael Tian | 0.25          | 87.25            | Review of GST returns and filings.   |
| 2024-08-26 | Greg Ibbott  | 1.60          | 928.00           | Further revise report to court.  |
| 2024-08-26 | Seamus Boyle | 0.40          | 180.00           | Discussions re: amended court report   |
|            |              | <b>123.15</b> | <b>56,196.70</b> |  |

**INVOICE SUMMARY**

**PROFESSIONAL FEES** \$ 56,196.70

GST on Professional Fees 2,809.84  
2,809.84

**TOTAL THIS INVOICE** **\$ 59,006.54**

| <b>Staff</b>   | <b>Position</b>                 | <b>Hours</b>  | <b>Hourly Rate<br/>\$</b> | <b>Total<br/>\$</b> |
|----------------|---------------------------------|---------------|---------------------------|---------------------|
| Greg Ibbott    | Senior Vice President           | 36.10         | 580.00                    | 20,938.00           |
| Seamus Boyle   | Vice President                  | 48.55         | 450.00                    | 21,847.50           |
| Elizabeth Chen | Senior Consultant               | 2.20          | 391.00                    | 860.20              |
| Michael Tian   | Senior Consultant               | 35.20         | 349.00                    | 12,284.80           |
| Julia Noort    | Senior Administrative Assistant | 0.60          | 225.00                    | 135.00              |
| Winnie Peng    | Senior Administrative Assistant | 0.50          | 214.00                    | 131.20              |
| (* Average)    |                                 | <b>123.15</b> | <b>456.33 *</b>           | <b>56,196.70</b>    |

## **Appendix “C”**

**IN THE MATTER OF THE RECEIVERSHIP OF  
KLONDIKE CONTRACTING CORPORATION & FBS FAIRVIEW BUILDER SERVICES  
INCORPORATED**

**SUMMARY OF RECEIVER'S TIME INCURRED  
UP TO AND INCLUDING AUGUST 30, 2024**

| <b>NAME</b>                                       | <b>TITLE</b>           | <b>HOURS</b>  | <b>RATE</b> | <b>AMOUNT</b>        |
|---|------------------------|---------------|-------------|----------------------|
| Greg Ibbott                                       | Trustee/Partner        | 81.20         | 606         | 49,176.00            |
| Seamus Boyle                                      | Trustee/Senior Manager | 178.00        | 450         | 80,100.00            |
| Elizabeth Chen                                    | Accountant             | 8.70          | 399         | 3,473.20             |
| Heather Ursaki                                    | Support Staff          | 1.80          | 197         | 354.60               |
| Julia Noort                                       | Support Staff          | 6.60          | 243         | 1,605.00             |
| Michael Tian                                      | Support Staff          | 126.60        | 356         | 45,057.90            |
| Sammer Kassam                                     | Support Staff          | 2.75          | 319         | 877.25               |
| Winnie Peng                                       | Support Staff          | 5.80          | 56          | 327.20               |
| <b>Subtotal</b>                                   |                        | <b>411.45</b> |             | <b>\$ 180,971.15</b> |
| <i>Disbursements</i>                              |                        |               |             | 303.95               |
| <b>TOTAL TRUSTEE'S FEES AND<br/>DISBURSEMENTS</b> |                        | <b>411.45</b> |             | <b>\$ 181,275.10</b> |

## **Appendix “D”**



**DLA Piper (Canada) LLP**  
 1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5  
[www.dlapiper.com](http://www.dlapiper.com)  
 T 604.687.9444  
 F 604.687.1612

March 14, 2024

MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

INVOICE NUMBER: 2268068  
 FILE NUMBER: 016155-00039  
 BUSINESS NUMBER: REG # 110 152 824  
 FROM THE OFFICE OF: Colin D. Brousson  
 DIRECT LINE: 604.643.6400

For Professional Services rendered and/or disbursements advanced through February 29, 2024.

|                                   |               |                 |
|-----------------------------------|---------------|-----------------|
| Total Fees:                       | \$            | 2,620.00        |
| Total GST:                        | \$            | 131.00          |
| Total PST:                        | \$            | 183.40          |
| <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>2,934.40</b> |

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*

### Remittance Advice:

Invoice No: 2268068

**Cheque Payments To:**  
 DLA Piper (Canada) LLP

1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5 Canada

*Please return remittance advice  
 with cheque.*

**Credit Card Payments:**

<https://payments.dlapiper.ca>

Tel: 604.643.2955  
 Toll free: 1.833.299.9022

### Please be sure to indicate invoice number on all payments

File No: 016155-00039

Amount: **CAD 2,934.40**

**Canadian Dollar EFT Payments To:**  
 DLA Piper (Canada) LLP

Bank: 010  
 Transit: 00010  
 Account Number: 2901315

**Canadian Dollar Wire Payments To:**  
 DLA Piper (Canada) LLP

Beneficiary Acc#: 000102901315  
 Bank: CANADIAN IMPERIAL  
 BANK OF COMMERCE  
 Canadian clearing code: //CC001000010  
 Swift Code: CIBCCATT  
 Bank Address: 400 Burrard Street  
 Vancouver, BC V6C 3A6

**US Dollar Wire Payments To:**  
 DLA Piper (Canada) LLP

Beneficiary Acc#: 000100368016  
 Bank: CANADIAN IMPERIAL  
 BANK OF COMMERCE  
 Swift Code: CIBCCATT  
 Bank Address: 400 Burrard Street  
 Vancouver, BC V6C 3A6

Intermediary Bank: Wells Fargo Bank, N.A.  
 New York, NY, US

Swift Code: PNBPU33NNYC  
 ABA# 026005092



**DLA Piper (Canada) LLP**  
 1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5  
 www.dlapiper.com  
 T 604.687.9444  
 F 604.687.1612

MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

Our File No: 016155-00039

|   |                 |                |
|---|-----------------|----------------|
| MNP Ltd.  | Date:           | March 14, 2024 |
| Re: Receivership - FBS Fairview Builder Services and Klondike Contracting Corporation | Invoice Number: | 2268068        |

## PROFESSIONAL SERVICES

For Professional Services rendered and/or disbursements advanced through February 29, 2024.

| <u>Date</u>       | <u>Professional</u> | <u>Description</u>   | <u>Amount</u>     |
|-------------------|---------------------|--|-------------------|
| 02/01/24          | AGM                 | Draft e-mail to D. Penner re. position on Builders Lien Act set-offs; send the same to C. Brousson and J. Bradshaw for review;                           | 475.00            |
| 02/01/24          | JDB                 | Confer with A. McCawley; email exchange and conference call with counsel for LDB; legal and procedural research;   | 460.00            |
| 02/05/24          | JDB                 | Email exchange with various counsel; review pleadings; confer with A. McCawley;  | 690.00            |
| 02/06/24          | AGM                 | Consider correspondence from J. Bradshaw re. letter from McMillan disputing amounts owing by LQMC to Klondike; correspond with J. Bradshaw re. the same; | 95.00             |
| 02/06/24          | JDB                 | Consider strategy; confer with A. McCawley; email exchange with client; conference call with Receiver;   | 460.00            |
| 02/07/24          | JDB                 | Email exchange with counsel;   | 172.50            |
| 02/12/24          | AGM                 | Consider correspondence from S. Boyle re. summary of accounts with the greatest chance of recovery;  | 95.00             |
| 02/14/24          | JDB                 | Email exchange and conference call with counsel;   | 172.50            |
| <b>Total Fees</b> |                     |  | <b>\$2,620.00</b> |

## BILL SUMMARY

|                   |             |    |          |
|-------------------|-------------|----|----------|
|                   | Total Fees: | \$ | 2,620.00 |
| REG # 110 152 824 | Total GST:  | \$ | 131.00   |
|                   | Total PST:  | \$ | 183.40   |



Matter: 016155-00039  
Invoice: 2268068  
Page : 2

**Total Current Invoice Due: CAD \$ 2,934.40**

This is our account.

**DLA Piper (Canada) LLP**

Per:

DocuSigned by:  
  
028B7F8486BA463  
Colin D. Brousseau

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*



**DLA Piper (Canada) LLP**  
 1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5  
[www.dlapiper.com](http://www.dlapiper.com)  
 T 604.687.9444  
 F 604.687.1612

April 11, 2024

MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

INVOICE NUMBER: 2275476  
 FILE NUMBER: 016155-00039  
 BUSINESS NUMBER: REG # 110 152 824  
 FROM THE OFFICE OF: Colin D. Brousson  
 DIRECT LINE: 604.643.6400

For Professional Services rendered and/or disbursements advanced through March 31, 2024.

|                                   |               |                 |
|-----------------------------------|---------------|-----------------|
| Total Fees:                       | \$            | 7,715.00        |
| Total Disbursements:              | \$            | 6.00            |
| Total GST:                        | \$            | 385.83          |
| Total PST:                        | \$            | 540.05          |
| <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>8,646.88</b> |

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*

#### Remittance Advice:

Invoice No: 2275476

**Cheque Payments To:**  
 DLA Piper (Canada) LLP

1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5 Canada

*Please return remittance advice  
 with cheque.*

#### Credit Card Payments:

<https://payments.dlapiper.ca>

Tel: 604.643.2955  
 Toll free: 1.833.299.9022

#### Please be sure to indicate invoice number on all payments

File No: 016155-00039

Amount: **CAD 8,646.88**

**Canadian Dollar EFT Payments To:**  
 DLA Piper (Canada) LLP

Bank: 010  
 Transit: 00010  
 Account Number: 2901315

**Canadian Dollar Wire Payments To:**  
 DLA Piper (Canada) LLP

Beneficiary Acc#: 000102901315  
 Bank: CANADIAN IMPERIAL  
 BANK OF COMMERCE  
 Canadian clearing code: //CC001000010  
 Swift Code: CIBCCATT  
 Bank Address: 400 Burrard Street  
 Vancouver, BC V6C 3A6

**US Dollar Wire Payments To:**  
 DLA Piper (Canada) LLP

Beneficiary Acc#: 000100368016  
 Bank: CANADIAN IMPERIAL  
 BANK OF COMMERCE  
 Swift Code: CIBCCATT  
 Bank Address: 400 Burrard Street  
 Vancouver, BC V6C 3A6

Intermediary Bank: Wells Fargo Bank, N.A.  
 New York, NY, US

Swift Code: PNBPU33NNYC  
 ABA# 026005092



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MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

Our File No: 016155-00039

|   |                 |                |
|---|-----------------|----------------|
| MNP Ltd.  | Date:           | April 11, 2024 |
| Re: Receivership - FBS Fairview Builder Services and Klondike Contracting Corporation | Invoice Number: | 2275476        |

## PROFESSIONAL SERVICES

For Professional Services rendered and/or disbursements advanced through March 31, 2024.

| <u>Date</u> | <u>Professional</u> | <u>Description</u>   | <u>Amount</u> |
|-------------|---------------------|--|---------------|
| 02/26/24    | JDB                 | Email exchange and conference call with Receiver;<br>review background materials re: BC Housing;<br>conference call with counsel for BC Housing re:<br>outstanding invoices;                   | 862.50        |
| 02/27/24    | JDB                 | Conference call with Receiver;   | 172.50        |
| 03/04/24    | MOL                 | Discuss with J. Bradshaw assessment of various claims<br>and formulating strategy to deal with same<br>concurrently;   | 85.00         |
| 03/04/24    | JDB                 | Email exchange and conference call with Receiver;  | 287.50        |
| 03/05/24    | JDB                 | Email exchange with counsel for lien claimants;<br>conference call with Receiver;  | 230.00        |
| 03/08/24    | JDB                 | Email exchange with Receiver; email exchange with<br>counsel for lien claimants;   | 345.00        |
| 03/11/24    | JDB                 | Email exchange and conference call with Receiver;<br>email exchange with counsel;  | 460.00        |
| 03/12/24    | AGM                 | Correspond with J. Bradshaw re. litigation files with M.<br>Lisanti; consider correspondence from S. Boyle; meet<br>with J. Bradshaw re. review of CDCC contracts and<br>response to S. Boyle; | 522.50        |
| 03/12/24    | JDB                 | Email exchange and conference call with Receiver;<br>confer with A. McCawley;  | 287.50        |
| 03/18/24    | MOL                 | E-mail to potential creditor with copy of receivership<br>order;   | 85.00         |



Matter: 016155-00039  
 Invoice: 2275476  
 Page : 2

| <u>Date</u>       | <u>Professional</u> | <u>Description</u>   | <u>Amount</u>     |
|-------------------|---------------------|--|-------------------|
| 03/22/24          | AGM                 | Consider inquiries and documents from S. Boyle re. dispute resolution preservation of rights; phone call with M. Lisanti to discuss background of litigation files; review CDCC documents with a view to determine dispute resolution reservations; legal research re. the same; draft and send draft response and questions to J. Bradshaw for consideration; | 1,472.50          |
| 03/26/24          | MOL                 | Meet with J. Bradshaw & A. McCawley to discuss strategy for getting money into estate and dealing with outstanding litigation matters; review correspondence regarding outstanding litigation matters;   | 765.00            |
| 03/26/24          | AGM                 | Meet with J. Bradshaw and M. Listanti to discuss strategy of file and file management;   | 570.00            |
| 03/27/24          | AGM                 | Strategize with M. Lisanti re. appearance for ongoing litigation files;  | 47.50             |
| 03/28/24          | AGM                 | Draft and send research question for students; reach out to B. Shaw re. discussion on construction contracts and steps for preservation of rights;   | 807.50            |
| 03/28/24          | MOL                 | Consider whether petitions to pay money into court in order to discharge liens is covered by receivership order and stay and discuss same with J. Bradshaw;  | 340.00            |
| 03/28/24          | CDB                 | Review various emails from lien holders; conference with Mr. ?Bradshaw on all matters;   | 375.00            |
| <b>Total Fees</b> |                     |  | <b>\$7,715.00</b> |

#### OTHER CHARGES AND DISBURSEMENT SUMMARY

##### Disbursements

##### Non-Taxable Disbursements

| <u>Description</u>                | <u>Amount</u> |
|-----------------------------------|---------------|
| BC Online Other Charges           | \$4.50        |
| <b>Non-Taxable Disbursements:</b> | <b>\$4.50</b> |

##### Taxable Disbursements

| <u>Description</u>            | <u>Amount</u> |
|-------------------------------|---------------|
| BC Online Fee                 | \$1.50        |
| <b>Taxable Disbursements:</b> | <b>\$1.50</b> |



Matter: 016155-00039  
Invoice: 2275476  
Page : 3

Total Other Charges & Disbursements: **\$6.00**

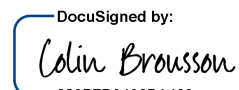
## BILL SUMMARY

|                   |                                   |               |                 |
|-------------------|-----------------------------------|---------------|-----------------|
|                   | Total Fees:                       | \$            | 7,715.00        |
|                   | Total Disbursements:              | \$            | 6.00            |
| REG # 110 152 824 | Total GST:                        | \$            | 385.83          |
|                   | Total PST:                        | \$            | 540.05          |
|                   | <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>8,646.88</b> |

This is our account.

**DLA Piper (Canada) LLP**

Per:

DocuSigned by:  
  
Colin D. Brousson

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*



**DLA Piper (Canada) LLP**  
 1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5  
[www.dlapiper.com](http://www.dlapiper.com)  
 T 604.687.9444  
 F 604.687.1612

May 13, 2024

MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

INVOICE NUMBER: 2283313  
 FILE NUMBER: 016155-00039  
 BUSINESS NUMBER: REG # 110 152 824  
 FROM THE OFFICE OF: Colin D. Brousson  
 DIRECT LINE: 604.643.6400

For Professional Services rendered and/or disbursements advanced through April 30, 2024.

|                                   |               |                 |
|-----------------------------------|---------------|-----------------|
| Total Fees:                       | \$            | 3,272.50        |
| Total GST:                        | \$            | 163.63          |
| Total PST:                        | \$            | 229.08          |
| <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>3,665.21</b> |

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*

### Remittance Advice:

Invoice No: 2283313

**Cheque Payments To:**  
 DLA Piper (Canada) LLP

1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5 Canada

*Please return remittance advice  
 with cheque.*

**Credit Card Payments:**

<https://payments.dlapiper.ca>

Tel: 604.643.2955  
 Toll free: 1.833.299.9022

### Please be sure to indicate invoice number on all payments

File No: 016155-00039

Amount: **CAD 3,665.21**

**Canadian Dollar EFT Payments To:**  
 DLA Piper (Canada) LLP

Bank: 010  
 Transit: 00010  
 Account Number: 2901315

**Canadian Dollar Wire Payments To:**  
 DLA Piper (Canada) LLP

Beneficiary Acc#: 000102901315  
 Bank: CANADIAN IMPERIAL  
 BANK OF COMMERCE  
 Canadian clearing code: //CC001000010  
 Swift Code: CIBCCATT  
 Bank Address: 400 Burrard Street  
 Vancouver, BC V6C 3A6

**US Dollar Wire Payments To:**  
 DLA Piper (Canada) LLP

Beneficiary Acc#: 000100368016  
 Bank: CANADIAN IMPERIAL  
 BANK OF COMMERCE  
 Swift Code: CIBCCATT  
 Bank Address: 400 Burrard Street  
 Vancouver, BC V6C 3A6

Intermediary Bank: Wells Fargo Bank, N.A.  
 New York, NY, US

Swift Code: PNBPU33NNYC  
 ABA# 026005092



**DLA Piper (Canada) LLP**  
 1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5  
 www.dlapiper.com  
 T 604.687.9444  
 F 604.687.1612

MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

Our File No: 016155-00039

MNP Ltd. Date: May 13, 2024  
 Re: Receivership - FBS Fairview Builder Services and Klondike Invoice Number: 2283313  
 Contracting Corporation

## PROFESSIONAL SERVICES

For Professional Services rendered and/or disbursements advanced through April 30, 2024.

| <u>Date</u>       | <u>Professional</u> | <u>Description</u>   | <u>Amount</u>     |
|-------------------|---------------------|--|-------------------|
| 03/26/24          | JDB                 | Confer with M. Lisanti and A. McCawley re: litigation;   | 632.50            |
| 03/27/24          | JDB                 | Email exchange and conference call with counsel;   | 287.50            |
| 03/28/24          | JDB                 | Email exchange with counsel; email exchange re: litigation parties; conference call with Receiver;                                     | 517.50            |
| 04/02/24          | KA7580              | Reviewing CCDC-5B contract; Considering impact of section 7.1.1 on the ability to enforce the dispute resolution clause in Part 8.     | 390.00            |
| 04/03/24          | KA7580              | Researching all case law on CCDC 5B contracts; Email to A. McCawley re findings and next steps.  | 877.50            |
| 04/26/24          | MOL                 | Discuss with J. Bradshaw application for directions for Khalsa et al. to pay outstanding amounts to Receivership; begin drafting same. | 425.00            |
| 04/29/24          | AGM                 | Send research on CDCC contracts to J. Bradshaw and M. Lisanti for consideration;   | 142.50            |
| <b>Total Fees</b> |                     |  | <b>\$3,272.50</b> |

## BILL SUMMARY

|                   |                                   |               |                 |
|-------------------|-----------------------------------|---------------|-----------------|
|                   | Total Fees:                       | \$            | 3,272.50        |
| REG # 110 152 824 | Total GST:                        | \$            | 163.63          |
|                   | Total PST:                        | \$            | 229.08          |
|                   | <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>3,665.21</b> |



Matter: 016155-00039  
Invoice: 2283313  
Page : 2

This is our account.

**DLA Piper (Canada) LLP**

Per:

DocuSigned by:

*Colin Brousson*

94E2D58F67344FE  
Colin D. Brousson

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*



**DLA Piper (Canada) LLP**  
1133 Melville St, Suite 2700  
Vancouver, BC  
V6E 4E5  
www.dlapiper.com  
T 604.687.9444  
F 604.687.1612

July 04, 2024

MNP Ltd.  
1021 West Hastings Street  
Suite 1600 - MNP Tower  
Vancouver, BC V6E 0C3 Canada

INVOICE NUMBER: 2297648  
FILE NUMBER: 016155-00039  
BUSINESS NUMBER: REG # 110 152 824  
FROM THE OFFICE OF: Colin D. Brousson  
DIRECT LINE: 604.643.6400

For Professional Services rendered and/or disbursements advanced through June 30, 2024.

|                                   |               |                 |
|-----------------------------------|---------------|-----------------|
| Total Fees:                       | \$            | 7,615.00        |
| Total GST:                        | \$            | 380.75          |
| Total PST:                        | \$            | 533.05          |
| <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>8,528.80</b> |

Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.

**Remittance Advice:**

Invoice No: 2297648

**Cheque Payments To:**  
DLA Piper (Canada) LLP  
1133 Melville St, Suite 2700  
Vancouver, BC  
V6E 4E5 Canada

Please return remittance advice with cheque.

**Credit Card Payments:**

<https://payments.dlapiper.ca>

Tel: 604.643.2955  
Toll free: 1.833.299.9022

**Please be sure to indicate invoice number on all payments**

File No: 016155-00039

Amount: **CAD 8,528.80**

**Canadian Dollar EFT Payments To:**  
DLA Piper (Canada) LLP

Bank: 010  
Transit: 00010  
Account Number: 2901315

**Canadian Dollar Wire Payments To:**  
DLA Piper (Canada) LLP

Beneficiary Acc#: 000102901315  
Bank: CANADIAN IMPERIAL  
BANK OF COMMERCE  
Canadian clearing code: //CC001000010  
Swift Code: CIBCCATT  
Bank Address: 400 Burrard Street  
Vancouver, BC V6C 3A6

**US Dollar Wire Payments To:**  
DLA Piper (Canada) LLP

Beneficiary Acc#: 000100368016  
Bank: CANADIAN IMPERIAL  
BANK OF COMMERCE  
Swift Code: CIBCCATT  
Bank Address: 400 Burrard Street  
Vancouver, BC V6C 3A6  
Intermediary Bank: Wells Fargo Bank, N.A.  
New York, NY, US  
Swift Code: PNBPU33NNYC  
ABA# 026005092



**DLA Piper (Canada) LLP**  
 1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5  
[www.dlapiper.com](http://www.dlapiper.com)  
 T 604.687.9444  
 F 604.687.1612

MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

Our File No: 016155-00039

|   |                 |               |
|---|-----------------|---------------|
| MNP Ltd.  | Date:           | July 04, 2024 |
| Re: Receivership - FBS Fairview Builder Services and Klondike Contracting Corporation | Invoice Number: | 2297648       |

## PROFESSIONAL SERVICES

For Professional Services rendered and/or disbursements advanced through June 30, 2024.

| <u>Date</u> | <u>Professional</u> | <u>Description</u>  | <u>Amount</u> |
|-------------|---------------------|---|---------------|
| 04/04/24    | JDB                 | Email exchange with client; document review;  | 230.00        |
| 04/08/24    | JDB                 | Email exchange with counsel; review Coal Harbour memo;                                      | 575.00        |
| 04/12/24    | JDB                 | Email exchange with counsel; conference call with Receiver;                                 | 172.50        |
| 04/16/24    | JDB                 | Email exchange with counsel;  | 115.00        |
| 04/24/24    | JDB                 | Email exchange and conference call with Receiver;   | 172.50        |
| 05/01/24    | MOL                 | Begin drafting application materials for advice and directions;                             | 807.50        |
| 05/01/24    | CDB                 | Review issues on liens and applications;  | 150.00        |
| 05/02/24    | MOL                 | Research and continue drafting application for directions as against third party debtor;    | 1,487.50      |
| 05/08/24    | MOL                 | Review BC Housing contract and invoiced amounts;  | 170.00        |
| 05/09/24    | MOL                 | Continue reviewing BC Housing invoices and memo from Coal Harbour Law regarding same;       | 212.50        |
| 05/14/24    | CDB                 | Draft email on consent order request for Receiver's position; draft reply email to counsel; | 150.00        |
| 05/14/24    | JDB                 | Email exchange with counsel; confer with M. Lisanti;  | 230.00        |
| 05/15/24    | MOL                 | Review correspondence regarding builders lien discharges;                                   | 425.00        |
| 05/16/24    | MOL                 | Call with J. Bradshaw, MNP, & BC Housing counsel  | 552.50        |



Matter: 016155-00039  
 Invoice: 2297648  
 Page : 2

| <u>Date</u>       | <u>Professional</u> | <u>Description</u>   | <u>Amount</u>     |
|-------------------|---------------------|--|-------------------|
|                   |                     | regarding disputed invoices;   |                   |
| 05/16/24          | JDB                 | Email exchange and conference call with Trustee;<br>confer with M. Lisanti; email exchange and conference<br>call with counsel for BC Housing; | 747.50            |
| 05/16/24          | CDB                 | Review request on employment claims; draft emails to<br>Mr. Boyle on WEPPA; draft email to counsel on liens;                                   | 225.00            |
| 05/21/24          | JDB                 | Confer with M. Lisanti;  | 172.50            |
| 05/27/24          | JDB                 | Email exchange with counsel; confer with M. Lisanti;   | 230.00            |
| 05/28/24          | MOL                 | Draft proof of claim template and discuss with J.<br>Bradshaw;   | 382.50            |
| 05/28/24          | JDB                 | Email exchange with counsel; confer with M. Lisanti;   | 172.50            |
| 05/29/24          | MOL                 | Review petition regarding builders lien discharge and<br>ensure receiver's position is known to petitioner's<br>counsel;                       | 85.00             |
| 06/12/24          | CDB                 | Attend to emails on consent order; review order;<br>instruct paralegal;  | 150.00            |
| <b>Total Fees</b> |                     |  | <b>\$7,615.00</b> |

## BILL SUMMARY

|                   |                                   |               |                 |
|-------------------|-----------------------------------|---------------|-----------------|
| REG # 110 152 824 | Total Fees:                       | \$            | 7,615.00        |
|                   | Total GST:                        | \$            | 380.75          |
|                   | Total PST:                        | \$            | 533.05          |
|                   | <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>8,528.80</b> |

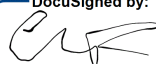


Matter: 016155-00039  
Invoice: 2297648  
Page : 3

This is our account.

**DLA Piper (Canada) LLP**

Per:

DocuSigned by:  
  
028B7D8486BA463...

Colin D. Brousseau

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*



**DLA Piper (Canada) LLP**  
 1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5  
[www.dlapiper.com](http://www.dlapiper.com)  
 T 604.687.9444  
 F 604.687.1612

September 11, 2024

MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

INVOICE NUMBER: 2313800  
 FILE NUMBER: 016155-00039  
 BUSINESS NUMBER: REG # 110 152 824  
 FROM THE OFFICE OF: Colin D. Brousson  
 DIRECT LINE: 604.643.6400

For Professional Services rendered and/or disbursements advanced through August 31, 2024.

|                                   |               |                  |
|-----------------------------------|---------------|------------------|
| Total Fees:                       | \$            | 26,865.00        |
| Total Disbursements:              | \$            | 55.72            |
| Total GST:                        | \$            | 1,343.91         |
| Total PST:                        | \$            | 1,880.55         |
| <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>30,145.18</b> |

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*

## Remittance Advice:

Invoice No: 2313800

**Cheque Payments To:**  
 DLA Piper (Canada) LLP

1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5 Canada

*Please return remittance advice  
 with cheque.*

## Credit Card Payments:

<https://payments.dlapiper.ca>

Tel: 604.643.2955  
 Toll free: 1.833.299.9022

## Please be sure to indicate invoice number on all payments

File No: 016155-00039

Amount: **CAD 30,145.18**

**Canadian Dollar EFT Payments To:**  
 DLA Piper (Canada) LLP

Bank: 010  
 Transit: 00010  
 Account Number: 2901315

**Canadian Dollar Wire Payments To:**  
 DLA Piper (Canada) LLP

Beneficiary Acc#: 000102901315  
 Bank: CANADIAN IMPERIAL  
 BANK OF COMMERCE  
 Canadian clearing code: //CC001000010  
 Swift Code: CIBCCATT  
 Bank Address: 400 Burrard Street  
 Vancouver, BC V6C 3A6

**US Dollar Wire Payments To:**  
 DLA Piper (Canada) LLP

Beneficiary Acc#: 000100368016  
 Bank: CANADIAN IMPERIAL  
 BANK OF COMMERCE  
 Swift Code: CIBCCATT  
 Bank Address: 400 Burrard Street  
 Vancouver, BC V6C 3A6

Intermediary Bank: Wells Fargo Bank, N.A.  
 New York, NY, US

Swift Code: PNBPU33NNYC  
 ABA# 026005092



**DLA Piper (Canada) LLP**  
 1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5  
[www.dlapiper.com](http://www.dlapiper.com)  
 T 604.687.9444  
 F 604.687.1612

MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

Our File No: 016155-00039

|   |                 |                    |
|---|-----------------|--------------------|
| MNP Ltd.  | Date:           | September 11, 2024 |
| Re: Receivership - FBS Fairview Builder Services and Klondike Contracting Corporation | Invoice Number: | 2313800            |

## PROFESSIONAL SERVICES

For Professional Services rendered and/or disbursements advanced through August 31, 2024.

| <u>Date</u> | <u>Professional</u> | <u>Description</u>  | <u>Amount</u> |
|-------------|---------------------|---|---------------|
| 07/16/24    | MOL                 | Review Notice of Civil Claim filed by Western Surety Company;   | 85.00         |
| 07/16/24    | JDB                 | Confer with M. Lisanti and C. Hunter;   | 325.00        |
| 07/17/24    | CJH                 | Review claims against FBS Fairview; review Notice of Hearing for July 31, 2024;   | 210.00        |
| 07/17/24    | MOL                 | Review Response to Petition and supporting affidavit of J.A.W. Fabricators alleging payment of funds from LQM to Klondike;  | 127.50        |
| 07/18/24    | JDB                 | Confer with M. Lisanti and C. Hunter;   | 195.00        |
| 07/22/24    | JDB                 | Email exchange and conference call with Receiver;   | 195.00        |
| 07/23/24    | MOL                 | Review monies paid into court under various actions; review petition and consider response;   | 425.00        |
| 07/24/24    | MOL                 | Call with J. Bradshaw & C. Hunter regarding Klondike petition response and evidence;  | 340.00        |
| 07/24/24    | CJH                 | Call with J. Bradshaw and M. Lisanti re Lonsdale application; review emails relating to FBS claim to lien holdback; emails with M. Lisanti re lien claims; review Lonsdale Petition and Mathieson Affidavits; review JAW Petition Response and Halliday Affidavit; review K&S Petition Response; review file for information relating to lien claims on the Lonsdale protection; consider position of the receiver; | 1,680.00      |
| 07/24/24    | JDB                 | Confer with M. Lisanti and C. Hunter; email exchange  | 195.00        |



Matter: 016155-00039  
 Invoice: 2313800  
 Page : 2

| <u>Date</u> | <u>Professional</u> | <u>Description</u>  | <u>Amount</u> |
|-------------|---------------------|---|---------------|
|             |                     | with Receiver;  |               |
| 07/25/24    | MOL                 | Discuss petition response & claims process with C. Hunter; draft response to petition and supporting affidavit;   | 892.50        |
| 07/25/24    | CJH                 | Review of information relating to liens on properties where Klondike was general contractor; call with M. Lisanti to discuss lien claims and strategy for July 31 application; call with S. Boyle to confirm instructions and approach for July 31 application and resolution of lien claims; emails with J. Bradshaw re application and lien claims process concept; review and revise draft petition response and supporting affidavit; emails with M. Lisanti; | 1,260.00      |
| 07/25/24    | JDB                 | Email exchange and conference call with Receiver; conference call with BC Housing;  | 780.00        |
| 07/26/24    | MOL                 | Finalize petition response materials and arrange for filing and service of same;  | 127.50        |
| 07/26/24    | CJH                 | Emails with M. Lisanti re finalizing materials for service and filing; review finalized petition response materials;  | 140.00        |
| 07/29/24    | MOL                 | Send e-mail to petitioner's counsel regarding petition record index; discuss claims process application with C. Hunter; review draft order regarding same;  | 212.50        |
| 07/29/24    | CJH                 | Discuss materials for application record with M. Lisanti; discuss position on application and lien adjudication process with J. Bradshaw; research on potential lien adjudication process in receivership proceedings; emails with J. Clark; review and comment on revised draft order;   | 770.00        |
| 07/30/24    | CJH                 | Emails with J. Clark re July 31 application; review responses to petition for lien claimants;   | 420.00        |
| 07/30/24    | MOL                 | Begin drafting application for claims process;  | 170.00        |
| 07/31/24    | CJH                 | Review books of authorities relating to Lonsdale application and consider potential issues for the receivership proceedings; prepare submissions relating to the receivership; attend Chambers for court application; discussions with opposing counsel on potential revisions to the order to reduce issues and have matter determined today; draft email to MNP re court issues and lien adjudication claims process;   | 4,900.00      |
| 07/31/24    | JDB                 | Confer with C. Hunter;  | 260.00        |



Matter: 016155-00039  
 Invoice: 2313800  
 Page : 3

| <u>Date</u> | <u>Professional</u> | <u>Description</u>   | <u>Amount</u> |
|-------------|---------------------|--|---------------|
| 08/01/24    | CJH                 | Discussion with M. Lisanti re next steps in receivership and lien claim process; draft reporting email to MNP;   | 210.00        |
| 08/02/24    | CJH                 | Review information relating to BC Housing Project; review new Notice of Civil Claim for lien claim; emails with M. Lisanti;  | 210.00        |
| 08/02/24    | MOL                 | Send e-mails to opposing counsel regarding stay of proceedings;  | 127.50        |
| 08/06/24    | CJH                 | Review voicemail from J. Clark; emails with M. Lisanti and J. Bradshaw; emails with J. Clark; draft reporting email to MNP re August 15 application and need for lien claims process;  | 280.00        |
| 08/06/24    | JDB                 | Email exchange with C. Hunter;   | 130.00        |
| 08/07/24    | CJH                 | Emails with J. Clark and S. Streat; emails with S. Boyle and M. Lisanti on lien claims process; review Notice of Civil Claim from Mega Cranes;   | 350.00        |
| 08/08/24    | CJH                 | Teams meeting with S. Boyle and G. Ibbott re liens claims process and issues with LQM; email from S. Boyle re review of CCDC relating to set-off claims; emails with M. Lisanti re next steps;   | 490.00        |
| 08/09/24    | CJH                 | Review email from S. Boyle re claims by LQM; review letter from McMillan re LQM's set-off claims; review signed copy of settlement agreement between LQM and Klondike; review CCDC 2 contract between LQM and Klondike; consider LQM's position on liquidated damages claim, costs to complete and matters covered by settlement agreement; consider additional information required to evaluate position; | 1,960.00      |
| 08/13/24    | CJH                 | Draft lien claim adjudication process; review email from S. Boyle and information relating to Klondike's claim against LQM; analyze whether invoices were included in the September 2023 settlement agreement; email to S. Boyle re issues with one invoice and request for further information on remaining invoices;   | 1,400.00      |
| 08/14/24    | MOL                 | Review petition materials and prepare to appear in chambers; discuss same with C. Hunter;  | 807.50        |
| 08/14/24    | CJH                 | Call with M. Lisanti to discuss position on LQM application; review additional information from S. Boyle relating to outstanding invoices; draft email to S. Boyle and G. Ibbott providing analysis of LQM set off claim as on provisions of the CCDC2 and Settlement Agreement;   | 840.00        |



Matter: 016155-00039  
 Invoice: 2313800  
 Page : 4

| <u>Date</u>       | <u>Professional</u> | <u>Description</u>  | <u>Amount</u>      |
|-------------------|---------------------|---|--------------------|
| 08/15/24          | MOL                 | Attend chambers regarding LQM petition to pay money into court;   | 2,592.50           |
| 08/15/24          | CJH                 | Calls with M. Lisanti to discuss LQM application and receiver's position; draft lien claims adjudication order; emails with M. Lisanti re outcome of application; email from G. Ibbott re relief to seek in application; call with J. Bradshaw re update on application and next steps; | 840.00             |
| 08/15/24          | JQJ                 | Conduct title search online in the Land Title Office;   | 30.00              |
| 08/15/24          | JDB                 | Conference call with C. Hunter;   | 195.00             |
| 08/20/24          | CJH                 | Review email from S. Boyle re status of receivership and outstanding issues to be addressed; review order relating to payment of funds into court; consider steps to obtain release of funds from Registrar;  | 280.00             |
| 08/21/24          | CJH                 | Review draft affidavit re release of funds to receiver; email to S. Boyle and G. Ibbott re issues relating to relief to be sought in application;   | 210.00             |
| 08/21/24          | DAY                 | Draft affidavit for payment out of court; email same to C. Hunter;  | 19.00              |
| 08/22/24          | DAY                 | Draft letter to registry; compile affidavit; email affidavit and letter to MNP for execution;   | 28.50              |
| 08/22/24          | CJH                 | Review and revised draft affidavit and letter re payment of funds from court; review and comment on draft first report of the receiver; emails with G. Ibbott re issues with lien claims process and potential charge on the lien funds;  | 1,050.00           |
| 08/23/24          | CJH                 | Draft and revise lien claims adjudication process;  | 910.00             |
| 08/23/24          | JDB                 | Conference call with C. Hunter; draft, review and revise claims adjudication process;   | 195.00             |
| <b>Total Fees</b> |                     |   | <b>\$26,865.00</b> |

## OTHER CHARGES AND DISBURSEMENT SUMMARY

### Disbursements

#### Non-Taxable Disbursements

| <u>Description</u>                                    | <u>Amount</u> |
|---|---------------|
| BC Online Other Charges                               | \$32.50       |
| BC Land Title & Survey BC Land Title, Survey charges, | \$10.72       |



Matter: 016155-00039  
 Invoice: 2313800  
 Page : 5

charged at actual charge

**Non-Taxable Disbursements: \$43.22**

**Taxable Disbursements**

**Description**

BC Online Fee \$10.50

BC Land Title & Survey Fee BC Land Title & Survey Fees \$2.00  
 & Service charges, charged at actual charge

**Taxable Disbursements: \$12.50**

**Total Other Charges & Disbursements: \$55.72**

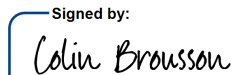
**BILL SUMMARY**

|                   |                                   |               |                  |
|-------------------|-----------------------------------|---------------|------------------|
|                   | Total Fees:                       | \$            | 26,865.00        |
|                   | Total Disbursements:              | \$            | 55.72            |
| REG # 110 152 824 | Total GST:                        | \$            | 1,343.91         |
|                   | Total PST:                        | \$            | 1,880.55         |
|                   | <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>30,145.18</b> |

This is our account.

**DLA Piper (Canada) LLP**

Per:

Signed by:  
  
 Colin D. Brousson

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*



**DLA Piper (Canada) LLP**  
 1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5  
[www.dlapiper.com](http://www.dlapiper.com)  
 T 604.687.9444  
 F 604.687.1612

November 21, 2023

MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

INVOICE NUMBER: 2239292  
 FILE NUMBER: 016155-00039  
 BUSINESS NUMBER: REG # 110 152 824  
 FROM THE OFFICE OF: Colin D. Brousson  
 DIRECT LINE: 604.643.6400

For Professional Services rendered and/or disbursements advanced through October 31, 2023.

|                                   |               |                 |
|-----------------------------------|---------------|-----------------|
| Total Fees:                       | \$            | 3,862.50        |
| Total GST:                        | \$            | 193.13          |
| Total PST:                        | \$            | 270.38          |
| <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>4,326.01</b> |

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*

#### Remittance Advice:

Invoice No: 2239292

**Cheque Payments To:**  
 DLA Piper (Canada) LLP

1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5 Canada

*Please return remittance advice  
 with cheque.*

**Credit Card Payments:**

<https://payments.dlapiper.ca>

Tel: 604.643.2955  
 Toll free: 1.833.299.9022

#### Please be sure to indicate invoice number on all payments

File No: 016155-00039

Amount: **CAD 4,326.01**

**Canadian Dollar EFT Payments To:**  
 DLA Piper (Canada) LLP

Bank: 010  
 Transit: 00010  
 Account Number: 2901315

**Canadian Dollar Wire Payments To:**  
 DLA Piper (Canada) LLP

Beneficiary Acc#: 000102901315  
 Bank: CANADIAN IMPERIAL  
 BANK OF COMMERCE  
 Canadian clearing code: //CC001000010  
 Swift Code: CIBCCATT  
 Bank Address: 400 Burrard Street  
 Vancouver, BC V6C 3A6

**US Dollar Wire Payments To:**  
 DLA Piper (Canada) LLP

Beneficiary Acc#: 000100368016  
 Bank: CANADIAN IMPERIAL  
 BANK OF COMMERCE  
 Swift Code: CIBCCATT  
 Bank Address: 400 Burrard Street  
 Vancouver, BC V6C 3A6

Intermediary Bank: Wells Fargo Bank, N.A.  
 New York, NY, US

Swift Code: PNBPU33NNYC  
 ABA# 026005092



**DLA Piper (Canada) LLP**  
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 F 604.687.1612

MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

Our File No: 016155-00039

|   |                 |                   |
|---|-----------------|-------------------|
| MNP Ltd.  | Date:           | November 21, 2023 |
| Re: Receivership - FBS Fairview Builder Services and Klondike Contracting Corporation | Invoice Number: | 2239292           |

## PROFESSIONAL SERVICES

For Professional Services rendered and/or disbursements advanced through October 31, 2023.

| <u>Date</u> | <u>Professional</u> | <u>Description</u>  | <u>Amount</u> |
|-------------|---------------------|---|---------------|
| 10/18/23    | JDB                 | Email exchange and conference call with Receiver; email exchange and conference call with debtor and counsel; review documents;   | 787.50        |
| 10/18/23    | CDB                 | Review entered receivership order;  | 140.00        |
| 10/23/23    | CDB                 | Review comments from BC Housing; draft email on same; draft email to Receiver;  | 280.00        |
| 10/23/23    | JDB                 | Email exchange with various parties;  | 210.00        |
| 10/24/23    | JDB                 | Email exchange with company counsel; email exchange and conference call with Receiver;  | 210.00        |
| 10/25/23    | AGM                 | Meet with C. Brousson and J. Bradshaw to discuss background of file; meet with J. Bradshaw to discuss related ongoing litigation and involvement of Coal Harbor Law; phone call with A. Greer re. the same;       | 297.50        |
| 10/26/23    | AGM                 | Consider correspondence from A. Meyer at Coal Harbour Law re. ongoing litigation matters; review case law for solicitor's liens; coordinate strategy on litigation matters with C. Brousson and J. Bradshaw;      | 340.00        |
| 10/26/23    | CDB                 | Attend call with counsel for Klondike; review email from Ms. Mayer;   | 560.00        |
| 10/26/23    | JDB                 | Email exchange and conference call with Receiver; email exchange and conference call with counsel for companies; email exchange with various stakeholders; draft, review and revise standard email communication; | 630.00        |



Matter: 016155-00039  
 Invoice: 2239292  
 Page : 2

| <u>Date</u>       | <u>Professional</u> | <u>Description</u>  | <u>Amount</u>     |
|-------------------|---------------------|---|-------------------|
|                   |                     | email exchange with counsel re: outstanding litigation;                             |                   |
| 10/27/23          | AGM                 | Consider correspondence from J. Bradshaw and Coal Harbour Law re. litigation files; | 127.50            |
| 10/27/23          | CDB                 | Draft email to Mr. Bradshaw; attend update call with Receiver;                      | 140.00            |
| 10/31/23          | CDB                 | Draft emails on BC housing;   | 140.00            |
| <b>Total Fees</b> |                     |   | <b>\$3,862.50</b> |

## BILL SUMMARY

|                   |                                   |               |                 |
|-------------------|-----------------------------------|---------------|-----------------|
|                   | Total Fees:                       | \$            | 3,862.50        |
| REG # 110 152 824 | Total GST:                        | \$            | 193.13          |
|                   | Total PST:                        | \$            | 270.38          |
|                   | <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>4,326.01</b> |

This is our account.

**DLA Piper (Canada) LLP**

Per:

DocuSigned by:

Colin D. Brousseau

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*



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 1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5  
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 F 604.687.1612

December 05, 2023

MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

INVOICE NUMBER: 2244317  
 FILE NUMBER: 016155-00039  
 BUSINESS NUMBER: REG # 110 152 824  
 FROM THE OFFICE OF: Colin D. Brousson  
 DIRECT LINE: 604.643.6400

For Professional Services rendered and/or disbursements advanced through November 30, 2023.

|                                   |               |                  |
|-----------------------------------|---------------|------------------|
| Total Fees:                       | \$            | 11,725.00        |
| Total GST:                        | \$            | 586.25           |
| Total PST:                        | \$            | 820.75           |
| <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>13,132.00</b> |

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*

### Remittance Advice:

Invoice No: 2244317

**Cheque Payments To:**  
 DLA Piper (Canada) LLP

1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5 Canada

*Please return remittance advice  
 with cheque.*

### Credit Card Payments:

<https://payments.dlapiper.ca>

Tel: 604.643.2955  
 Toll free: 1.833.299.9022

### Please be sure to indicate invoice number on all payments

File No: 016155-00039

Amount: **CAD 13,132.00**

**Canadian Dollar EFT Payments To:**  
 DLA Piper (Canada) LLP

Bank: 010  
 Transit: 00010  
 Account Number: 2901315

**Canadian Dollar Wire Payments To:**  
 DLA Piper (Canada) LLP

Beneficiary Acc#: 000102901315  
 Bank: CANADIAN IMPERIAL  
 BANK OF COMMERCE  
 Canadian clearing code: //CC001000010  
 Swift Code: CIBCCATT  
 Bank Address: 400 Burrard Street  
 Vancouver, BC V6C 3A6

**US Dollar Wire Payments To:**  
 DLA Piper (Canada) LLP

Beneficiary Acc#: 000100368016  
 Bank: CANADIAN IMPERIAL  
 BANK OF COMMERCE  
 Swift Code: CIBCCATT  
 Bank Address: 400 Burrard Street  
 Vancouver, BC V6C 3A6

Intermediary Bank: Wells Fargo Bank, N.A.  
 New York, NY, US

Swift Code: PNBPU33NNYC  
 ABA# 026005092



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MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

Our File No: 016155-00039

|   |                 |                   |
|---|-----------------|-------------------|
| MNP Ltd.  | Date:           | December 05, 2023 |
| Re: Receivership - FBS Fairview Builder Services and Klondike Contracting Corporation | Invoice Number: | 2244317           |

## PROFESSIONAL SERVICES

For Professional Services rendered and/or disbursements advanced through November 30, 2023.

| <u>Date</u> | <u>Professional</u> | <u>Description</u>   | <u>Amount</u> |
|-------------|---------------------|--|---------------|
| 11/01/23    | CDB                 | Attend call with BC Housing's counsel;   | 210.00        |
| 11/01/23    | JDB                 | Email exchange with various creditors; email exchange and conference call with Receiver; email exchange with Coal Harbour;   | 525.00        |
| 11/02/23    | JDB                 | Email exchange with various creditors;   | 262.50        |
| 11/07/23    | AGM                 | Meet with J. Bradshaw to discuss incoming litigation files; consider contents of incoming litigation files;  | 255.00        |
| 11/07/23    | BMS                 | Conference with J. Bradshaw regarding notice of contract termination under Builders Lien Act; reviewed and considered applicable sections of the Act; provided advice and recommendations to Mr. Bradshaw; | 240.00        |
| 11/07/23    | JDB                 | Email exchange with various creditors; email exchange and conference call with Receiver; confer with A. McCawley; confer with C. Brousson; review litigation files and documents;                          | 735.00        |
| 11/08/23    | CDB                 | Review latest correspondence on liens; instruct Mr. Bradshaw;  | 140.00        |
| 11/09/23    | AGM                 | Attend call with Coal Harbour Law re. background of litigation files; consider background of litigation files; meet with J. Bradshaw to discuss the same;  | 850.00        |
| 11/09/23    | JDB                 | Call with Coal Harbour;  | 525.00        |
| 11/10/23    | CDB                 | Review email from McKenzie and draft comments on same; review comments from Ibbott and comment on  | 210.00        |



Matter: 016155-00039  
 Invoice: 2244317  
 Page : 2

| <u>Date</u>       | <u>Professional</u> | <u>Description</u>  | <u>Amount</u>      |
|-------------------|---------------------|---|--------------------|
|                   |                     | same;   |                    |
| 11/14/23          | AGM                 | Instruct students regarding summarizing the legal claims involving Klondike Contracting Corporation and Fairview Builder Services Incorporated; consider claims and documents re. the same; | 637.50             |
| 11/14/23          | JL7586              | Correspond and obtain instructions from A. McCawley; begin reviewing and summarizing claims;  | 32.50              |
| 11/14/23          | SG7582              | Correspondence re litigation review; commence litigation review;  | 60.00              |
| 11/14/23          | CDB                 | Conference with Mr. Bradshaw on BC Housing issues; draft email to Ms. Do, counsel for unsecured creditor, attempting to argue payment order still should be followed;                       | 210.00             |
| 11/14/23          | JDB                 | Email exchange with various creditors;  | 262.50             |
| 11/15/23          | AGM                 | Consider instructions from J. Bradshaw;   | 42.50              |
| 11/16/23          | SG7582              | Review claims/disputes; commence summary of findings in spreadsheet;  | 1,830.00           |
| 11/16/23          | JL7586              | Review and summarize claims and disputes against KCC and FBS;   | 1,657.50           |
| 11/16/23          | MF7587              | Review and summarize outstanding claims for accounts receivable and accounts payable of Klondike Contracting Corporation and FBS Fairview Builder Services Incorporated;                    | 1,470.00           |
| 11/16/23          | JDB                 | Email exchange with counsel and stakeholders;   | 210.00             |
| 11/17/23          | MF7587              | Review and summarize outstanding claims for accounts receivable and accounts payable of Klondike Contracting Corporation and FBS Fairview Builder Services Incorporated;                    | 1,230.00           |
| 11/17/23          | JL7586              | Continue reviewing FBS and KCC data folder and provide case summaries;  | 130.00             |
| <b>Total Fees</b> |                     |   | <b>\$11,725.00</b> |

## BILL SUMMARY

|                   |                                   |               |                  |
|-------------------|-----------------------------------|---------------|------------------|
| REG # 110 152 824 | Total Fees:                       | \$            | 11,725.00        |
|                   | Total GST:                        | \$            | 586.25           |
|                   | Total PST:                        | \$            | 820.75           |
|                   | <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>13,132.00</b> |



Matter: 016155-00039  
Invoice: 2244317  
Page : 3

This is our account.

**DLA Piper (Canada) LLP**

Per:

DocuSigned by:  


028B7D8426BA463...  
Colin D. Brousseau

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*



**DLA Piper (Canada) LLP**  
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 F 604.687.1612

January 11, 2024

MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

INVOICE NUMBER: 2253139  
 FILE NUMBER: 016155-00039  
 BUSINESS NUMBER: REG # 110 152 824  
 FROM THE OFFICE OF: Colin D. Brousson  
 DIRECT LINE: 604.643.6400

For Professional Services rendered and/or disbursements advanced through December 31, 2023.

|                                   |               |                 |
|-----------------------------------|---------------|-----------------|
| Total Fees:                       | \$            | 1,235.50        |
| Total Other Charges:              | \$            | 13.94           |
| Total GST:                        | \$            | 62.48           |
| Total PST:                        | \$            | 86.49           |
| <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>1,398.41</b> |

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*

### Remittance Advice:

Invoice No: 2253139

**Cheque Payments To:**  
 DLA Piper (Canada) LLP

1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5 Canada

*Please return remittance advice  
 with cheque.*

### Credit Card Payments:

<https://payments.dlapiper.ca>

Tel: 604.643.2955  
 Toll free: 1.833.299.9022

### Please be sure to indicate invoice number on all payments

File No: 016155-00039

Amount: **CAD 1,398.41**

**Canadian Dollar EFT Payments To:**  
 DLA Piper (Canada) LLP

Bank: 010  
 Transit: 00010  
 Account Number: 2901315

**Canadian Dollar Wire Payments To:**  
 DLA Piper (Canada) LLP

Beneficiary Acc#: 000102901315  
 Bank: CANADIAN IMPERIAL  
 BANK OF COMMERCE  
 Canadian clearing code: //CC001000010  
 Swift Code: CIBCCATT  
 Bank Address: 400 Burrard Street  
 Vancouver, BC V6C 3A6

**US Dollar Wire Payments To:**  
 DLA Piper (Canada) LLP

Beneficiary Acc#: 000100368016  
 Bank: CANADIAN IMPERIAL  
 BANK OF COMMERCE  
 Swift Code: CIBCCATT  
 Bank Address: 400 Burrard Street  
 Vancouver, BC V6C 3A6

Intermediary Bank: Wells Fargo Bank, N.A.  
 New York, NY, US

Swift Code: PNBPU3NNYC  
 ABA# 026005092



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 T 604.687.9444  
 F 604.687.1612

MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

Our File No: 016155-00039

|   |                 |                  |
|---|-----------------|------------------|
| MNP Ltd.  | Date:           | January 11, 2024 |
| Re: Receivership - FBS Fairview Builder Services and Klondike Contracting Corporation | Invoice Number: | 2253139          |

## PROFESSIONAL SERVICES

For Professional Services rendered and/or disbursements advanced through December 31, 2023.

| <u>Date</u>       | <u>Professional</u> | <u>Description</u>  | <u>Amount</u>     |
|-------------------|---------------------|---|-------------------|
| 12/07/23          | DAY                 | Receive instructions from J. Bradshaw; review relevant email and documents; draft demand letter and email same to J. Bradshaw;                    | 25.50             |
| 12/07/23          | AGM                 | Provide instructions to S. Wright re. litigation review;  | 127.50            |
| 12/08/23          | AGM                 | Consider analysis of receiver's actions from C. Brousson;   | 85.00             |
| 12/18/23          | JDB                 | Draft, review and revise demand letter; email exchange and conference call with Ensign Pacific; email exchange and conference call with Receiver; | 420.00            |
| 12/20/23          | JDB                 | Email exchange with Receiver; email exchange and conference call with BC Housing and Receiver;  | 577.50            |
| <b>Total Fees</b> |                     |   | <b>\$1,235.50</b> |

## OTHER CHARGES AND DISBURSEMENT SUMMARY

### Other Charges

### Taxable Other Charges

| <u>Description</u>            | <u>Amount</u>  |
|-------------------------------|----------------|
| Courier                       | \$13.94        |
| <b>Taxable Other Charges:</b> | <b>\$13.94</b> |

## BILL SUMMARY



Matter: 016155-00039  
Invoice: 2253139  
Page : 2


REG # 110 152 824

|                                   |               |                 |
|-----------------------------------|---------------|-----------------|
| Total Fees:                       | \$            | 1,235.50        |
| Total Other Charges:              | \$            | 13.94           |
| Total GST:                        | \$            | 62.48           |
| Total PST:                        | \$            | 86.49           |
| <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>1,398.41</b> |

This is our account.

**DLA Piper (Canada) LLP**

Per:

DocuSigned by:  
  
028B7D8486BA463  
Colin D. Brousseau

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*



**DLA Piper (Canada) LLP**  
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 T 604.687.9444  
 F 604.687.1612

February 07, 2024

MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

INVOICE NUMBER: 2259553  
 FILE NUMBER: 016155-00039  
 BUSINESS NUMBER: REG # 110 152 824  
 FROM THE OFFICE OF: Colin D. Brousson  
 DIRECT LINE: 604.643.6400

For Professional Services rendered and/or disbursements advanced through January 31, 2024.

|                                   |               |                 |
|-----------------------------------|---------------|-----------------|
| Total Fees:                       | \$            | 7,317.50        |
| Total Disbursements:              | \$            | 373.98          |
| Total GST:                        | \$            | 368.24          |
| Total PST:                        | \$            | 512.23          |
| <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>8,571.95</b> |

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*

## Remittance Advice:

Invoice No: 2259553

**Cheque Payments To:**  
 DLA Piper (Canada) LLP

1133 Melville St, Suite 2700  
 Vancouver, BC  
 V6E 4E5 Canada

*Please return remittance advice  
 with cheque.*

## Credit Card Payments:

<https://payments.dlapiper.ca>

Tel: 604.643.2955  
 Toll free: 1.833.299.9022

## Please be sure to indicate invoice number on all payments

File No: 016155-00039

Amount: **CAD 8,571.95**

**Canadian Dollar EFT Payments To:**  
 DLA Piper (Canada) LLP

Bank: 010  
 Transit: 00010  
 Account Number: 2901315

**Canadian Dollar Wire Payments To:**  
 DLA Piper (Canada) LLP

Beneficiary Acc#: 000102901315  
 Bank: CANADIAN IMPERIAL  
 BANK OF COMMERCE  
 Canadian clearing code: //CC001000010  
 Swift Code: CIBCCATT  
 Bank Address: 400 Burrard Street  
 Vancouver, BC V6C 3A6

**US Dollar Wire Payments To:**  
 DLA Piper (Canada) LLP

Beneficiary Acc#: 000100368016  
 Bank: CANADIAN IMPERIAL  
 BANK OF COMMERCE  
 Swift Code: CIBCCATT  
 Bank Address: 400 Burrard Street  
 Vancouver, BC V6C 3A6

Intermediary Bank: Wells Fargo Bank, N.A.  
 New York, NY, US

Swift Code: PNBPU33NNYC  
 ABA# 026005092



**DLA Piper (Canada) LLP**  
 1133 Melville St, Suite 2700  
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 V6E 4E5  
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 T 604.687.9444  
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MNP Ltd.  
 1021 West Hastings Street  
 Suite 1600 - MNP Tower  
 Vancouver, BC V6E 0C3 Canada

Our File No: 016155-00039

|   |                 |                   |
|---|-----------------|-------------------|
| MNP Ltd.  | Date:           | February 07, 2024 |
| Re: Receivership - FBS Fairview Builder Services and Klondike Contracting Corporation | Invoice Number: | 2259553           |

## PROFESSIONAL SERVICES

For Professional Services rendered and/or disbursements advanced through January 31, 2024.

| <u>Date</u> | <u>Professional</u> | <u>Description</u>   | <u>Amount</u> |
|-------------|---------------------|--|---------------|
| 01/03/24    | MOL                 | Call with J. Bradshaw regarding review of accounts receivable matters for Klondike and Fairview;   | 212.50        |
| 01/03/24    | JDB                 | Confer with A. McCawley; instruct M. Lisanti;  | 287.50        |
| 01/05/24    | JL7586              | Search, organize, compile and save Fairview data room files;   | 130.00        |
| 01/05/24    | MOL                 | Begin reviewing accounts-payable files;  | 297.50        |
| 01/05/24    | JDB                 | Confer with M. Lisanti; document review;   | 172.50        |
| 01/10/24    | JQJ                 | Conduct six (6) title searches online in the Land Title Office;  | 60.00         |
| 01/10/24    | MOL                 | Continue reviewing accounts payable claims; review land title searches to confirm liens have been cancelled from properties; review outstanding litigation files and determine whether action is required; | 1,487.50      |
| 01/11/24    | JQJ                 | Obtain copies of builders liens and related documents online in the Land Title Office as requested by M. Listani;  | 90.00         |
| 01/11/24    | MOL                 | Review further claims of builders liens; draft opinion on outstanding accounts payable with respect to projects with accounts receivable;  | 297.50        |
| 01/12/24    | MOL                 | Finish drafting summary of outstanding accounts payable;   | 552.50        |
| 01/15/24    | JDB                 | Email exchange with counsel for lien claimants;  | 172.50        |



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 Invoice: 2259553  
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| <u>Date</u>       | <u>Professional</u> | <u>Description</u>  | <u>Amount</u>     |
|-------------------|---------------------|---|-------------------|
| 01/16/24          | MOL                 | Discuss memo on accounts payable with J. Bradshaw; revise same for sending to client;   | 127.50            |
| 01/16/24          | JDB                 | Review claims; confer with M. Lisanti; email exchange with Receiver;  | 402.50            |
| 01/17/24          | JDB                 | Draft, review and revise memo re: claims; email exchange with client;   | 575.00            |
| 01/19/24          | JDB                 | Email exchange with counsel;  | 172.50            |
| 01/29/24          | AGM                 | Correspond with J. Bradshaw re. research questions;   | 95.00             |
| 01/31/24          | AGM                 | Consider questions from S. Boyle re. Builders Lien Act; research re. the same and provide summary of answers to C. Brousson and J. Bradshaw; attend MS Teams meeting with G. Ibbott, S. Boyle, and J. Bradshaw to discuss the same; | 2,185.00          |
| <b>Total Fees</b> |                     |   | <b>\$7,317.50</b> |

#### **OTHER CHARGES AND DISBURSEMENT SUMMARY**

##### **Disbursements**

##### **Non-Taxable Disbursements**

| <u>Description</u>   | <u>Amount</u>   |
|--|-----------------|
| BC Online Other Charges  | \$32.50         |
| BC Land Title & Survey BC Land Title, Survey charges, charged at actual charge | \$293.98        |
| <b>Non-Taxable Disbursements:</b>  | <b>\$326.48</b> |

##### **Taxable Disbursements**

| <u>Description</u>   |                |
|--|----------------|
| BC Online Fee  | \$10.50        |
| BC Land Title & Survey Fee BC Land Title & Survey Fees & Service charges, charged at actual charge | \$37.00        |
| <b>Taxable Disbursements:</b>  | <b>\$47.50</b> |

**Total Other Charges & Disbursements: \$373.98**

#### **BILL SUMMARY**

|                      |    |          |
|----------------------|----|----------|
| Total Fees:          | \$ | 7,317.50 |
| Total Disbursements: | \$ | 373.98   |



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Invoice: 2259553  
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REG # 110 152 824

|                                   |               |                 |
|-----------------------------------|---------------|-----------------|
| Total GST:                        | \$            | 368.24          |
| Total PST:                        | \$            | 512.23          |
| <b>Total Current Invoice Due:</b> | <b>CAD \$</b> | <b>8,571.95</b> |

This is our account.

**DLA Piper (Canada) LLP**

Per:

DocuSigned by:  
A stylized signature of Colin D. Brousson in blue ink.

Colin D. Brousson

*Please note that this account is payable on receipt. If not paid within 30 days from the invoice date, interest at the rate of prime plus 2% per annum will be charged from the invoice date.*