



This is the 1st Affidavit of W. Roberts,
made on August 26, 2021

No. VCL-S-204082
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

Between

THE TORONTO-DOMINION BANK

Petitioner

And

RONSONS SHOE STORES LTD.

Respondent

AFFIDAVIT

I, William L. Roberts, Barrister and Solicitor, of 1600 – 925 West Georgia Street, in the City of Vancouver, Province of British Columbia, MAKE OATH AND SAY AS FOLLOWS:

1. I am a Partner with the law firm of Lawson Lundell LLP (“**Lawson**”), solicitors for MNP Ltd., the Court Appointed Receiver (the “**Receiver**”), of all of the assets, undertakings and property of the Respondent, Ronsons Shoe Stores Ltd. (“**Ronsons**”), and as such have personal knowledge of the facts and matters herein deposed to by me, except where stated to be made upon information and belief in which case I believe such facts and matters to be true.
2. True copies of the accounts rendered herein to the Receiver for services performed by our offices for the period of time from April 2020 to July 2021 (the “**Accounts**”) are attached and marked as **Exhibit “A”** and are summarized below:

Account Dated: May 10, 2020		
William L. Roberts	21.30 hours @ \$590/hour	\$12,567.00
Michael B. Morgan	1.10 hours @ \$525/hour	577.50
Bryan Gibbons	1.30 hours @ \$500/hour	650.00
Kimberley Robertson	0.20 hours @ 500/hour	100.00
Katty Allen	0.70 hours @ 375/hour	262.50.00

Blair McRadu	11.50 hours@ 330/hour	3,795.00
Cecilia Conto	4.70 hours @ 170/hour	799.00
	Total Fees	\$18,751.00
Disbursements		
	Photocopies	\$24.60
	Library Searches	1,451
	Library Services (Non-Taxable)	101.57
	BC Online	28.00
	BC Online Services	6.00
	Total Disbursements	\$1,611.17
Taxes		
	GST	\$1,013.03
	PST	\$1,312.57
	Total Invoice	\$22,687.77
Account Dated: June 2, 2020		
William L. Roberts	2.50 hours @ \$590/hour	\$1,475.00
Ryan Berger	0.60 hours @ \$525/hour	315.00
Bryan Gibbons	3.20 hours @ \$500/hour	1600.00
Katty Allen	0.20 hours @ 375/hour	75.00
Blair McRadu	10.00 hours@ 330/hour	3,300.00
Cecilia Conto	5.70 hours @ 170/hour	969.00
	Total Fees	\$7,734.00
Disbursements		
	Photocopies	\$2.40
	Library Searches	100.00
	Total Disbursements	\$102.40
Taxes		
	GST	\$391.82
	PST	\$541.38
	Total Invoice	\$8,769.60
Account Dated: July 9, 2020		
William L. Roberts	22.60 hours @ \$590/hour	\$13,334.00
Bryan Gibbons	7.20 hours @ \$500/hour	3,600.00
Blair McRadu	2.9 hours@ 330/hour	957.00
Noor Mann	6.10 hours@270/hour	1,647.00
Cecilia Conto	11.80 hours @ 170/hour	2,006.00
Amanda Jamieson	0.70 hours@150/hour	105.00
	Total Fees	\$21,649.00
Disbursements		
	Photocopies	\$147.80
	BC Online (Non-Taxable)	80.00
	Courier services	51.62

	BC Online	54.00
	Total Disbursements	\$333.42
Taxes		
	GST	\$1,095.12
	PST	\$1,515.43
	Total Invoice	\$24,592.97
Account Dated: August 10, 2020		
William L. Roberts	3.10 hours @ \$590/hour	\$1,829.00
Bryan Gibbons	2.20 hours @ \$500/hour	1,100.00
Noor Mann	1.80 hours @ \$270/hour	486.00
Cecilia Conto	5.10 hours @ 170/hour	867.00
	Total Fees	\$4,282.00
Disbursements		
	Photocopies	\$16.50
	West Coast Title Searches (Non-Taxable)	40.00
	BC Online	7.00
	Courier services	35.00
	West Coast Title Searches	29.00
	Total Disbursements	\$127.50
Taxes		
	GST	\$218.48
	PST	\$299.74
	Total Invoice	\$4,927.72
Account Dated: October 6, 2020		
William L. Roberts	1.50 hours @ \$590/hour	\$885.00
Cecilia Conto	0.30 hours @ 170/hour	51.00
	Total Fees	\$936.00
Taxes		
	GST	\$46.80
	PST	\$65.52
	Total Invoice	\$1,048.32
Account Dated: December 7, 2020		
William L. Roberts	0.70 hours @ \$590/hour	\$413.00
Cecilia Conto	0.20 hours @ 170/hour	34.00
	Total Fees	\$447.00
Taxes		
	GST	\$22.35
	PST	\$31.29
	Total Invoice	\$500.64
Account Dated: February 10, 2021		
William L. Roberts	0.60 hours @ \$660/hour	\$396.00
	Total Fees	\$396.00
Disbursements		
	Photocopies	\$29.10
	Total Disbursements	\$29.10

Taxes		
	GST	\$21.26
	PST	\$27.72
	Total Invoice	\$474.08
Account Dated: March 4, 2021		
William L. Roberts	0.70 hours @ \$660/hour	\$462.00
	Total Fees	\$462.00
Taxes		
	GST	\$23.10
	PST	\$32.34
	Total Invoice	\$517.44
Account Dated: May 10, 2021		
William L. Roberts	1.70 hours @ \$660/hour	\$1,122.00
	Total Fees	\$1,122.00
Taxes		
	GST	\$56.10
	PST	\$78.54
	Total Invoice	\$1,256.64
Account Dated: June 8, 2021		
William L. Roberts	2.40 hours @ \$660/hour	\$1,584.00
	Total Fees	\$1,584.00
Taxes		
	GST	\$79.20
	PST	\$110.88
	Total Invoice	\$1,774.08
Account Dated July 6, 2021		
William L. Roberts	0.40 hours @ \$660/hour	\$264.00
Cecilia Conto	0.60 hours @ \$175/hour	\$105.00
	Total Fees	\$369.00
Disbursements		
	Photocopies	\$1.20
	Total Disbursements	\$1.20
Taxes		
	GST	\$18.51
	PST	\$25.83
	Total Invoice	\$414.54

3. For the period of April 2020 to July 2021, Lawson spent a total of 135.60 hours broken down as follows:

Timekeeper	Rate	Amount
Amanda Jamieson	0.70 hours @ \$150/hour	\$105.00
Bryan Gibbons	13.90 hours @ \$500/hour	\$6,950.00
Blair McRadu	24.40 hours @ \$330/hour	\$8,052.00
Cecilia Conto	28.40 hours @ \$170/hour	\$4,831.00
Kimberley Robertson	0.20 hours @ \$500/hour	\$100.00
Katy Allen	0.90 hours @ \$370/hour	\$337.50
Michael Morgan	1.10 hours @ \$525/hour	\$577.50
Noor Mann	7.90 hours @ \$270/hour	\$2,133.00
Ryan Berger	0.60 hours @ \$525/hour	\$315.00
William Roberts	51.70 hours @ \$590/hour	\$30,503.00
William Roberts	5.8 hours @ \$660/hour	\$3,828.00
	Total	\$57,732.00

4. I am a member in good standing of the Law Society of British Columbia and have been so since 1999. My practice is devoted primarily to the areas of bankruptcy and insolvency.
5. Bryan Gibbons is a member in good standing of the Law Society of British Columbia and has been so since 1991. His practice is devoted primarily to the areas of banking, commercial lending, insolvency and realization.
6. At the time the accounts were issued, Blair McRadu was an associate employed by Lawson. Mr. McRadu is a member in good standing of the Law Society of British Columbia and has been so since 2017.
7. At the time the accounts were issued, Kimberley Robertson was a partner with Lawson. In December 2020, Ms. Robertson was appointed as a Master of the Supreme Court of British Columbia.

8. Katy Allen is a member in good standing of the Law Society of British Columbia and has been so since 2014. Ms. Allen's practice is devoted primarily to the areas of labour and employment.
9. Noor Mann is a member in good standing of the Law Society of British Columbia and has been so since 2020. Mr. Mann's practice is devoted primarily to the areas of bankruptcy and insolvency.
10. Ryan Berger is a member in good standing of the Law Society of British Columbia and has been so since 1999. Mr. Berger's practice is devoted primary to the areas of labour and employment.
11. Amanda Jamieson and Cecilia Conto are paralegals employed by Lawson.
12. All of the time recorded in the Accounts was for legal services requested by, and at the instruction of, the Receiver herein.
13. Each of the timekeepers were billed at their standard hourly rate and the accounts were prepared on the basis of only charging for the time actually spent. An effort was made to avoid unnecessary duplication of efforts and to staff the file appropriately.
14. The following is a summary of the disbursements billed to the Receiver for the period of April 2020 to July 2021:

Disbursement	Amount Billed	Details
Courier Services	\$58.26	Third party invoices issued by Novex and Zodiac
Canada Post Priority Courier	\$28.36	Third party invoice issued by Canada Post
Photocopies	\$168.60	562 photocopies x \$0.30/page
Colour Photocopies	\$53.00	53 photocopies x \$1.00/page
BC Online	\$89.00	Third party invoice issued by BC Online
BC Online (GST exempt)	\$80.00	Third party invoice issued by BC Online

BC Online Service Charge	\$6.00	Third party invoice issued by BC Online
Library searches	\$1,551.00	
PST	\$101.57	
West Coast Title Search	\$29.00	Third party invoice issued by West Cost Title Search
West Coast Title Search (exempt)	\$40.00	Third party invoice issued by West Cost Title Search
Total	\$2,204.79	

The Library Search fees are charged to clients at the suggested chargeback rate issued by the supplier WestlawNext Canada.

15. Attached hereto and marked as **Exhibit "B"** is a true copy of a Recap of Cost Detail for the period of April 2020 to July 2021, indicating the quantity, rate and amount billed for each disbursement during that time period.
16. I swear this Affidavit in support of an application to pass the Accounts.

SWORN BEFORE ME at the City of)
Vancouver, in the Province of British)
Columbia, this 6 day of August,)
2021)
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A Commissioner for taking Oaths for
British Columbia



WILLIAM L. ROBERTS

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