



No. S105562
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

SERVUS CREDIT UNION LTD. and
CONCENTRA FINANCIAL SERVICES ASSOCIATION
ASSOCIATION DE SERVICES FINANCIERS CONCENTRA

PLAINTIFFS

AND:

SQUAMISH JV LTD.

DEFENDANT

RECEIVER'S THIRD REPORT TO THE COURT

Introduction and Purpose of the Report

1. Meyers Norris Penny Limited (now known as MNP Ltd.):
 - (a) was appointed Interim Receiver ("IR") of the assets and undertakings of Squamish JV Ltd. ("Squamish JV" or the "Company") by The Supreme Court of British Columbia (the "Court"), effective August 31, 2010 (the "Interim Receiver Order"); and
 - (b) was appointed Receiver of the assets and undertakings of Squamish JV by the Supreme Court of British Columbia effective November 24, 2010 (the "Receivership Order").
2. The IR previously filed three reports to the Court, and the Receiver previously filed two reports. This report should be read in conjunction with the previously filed IR's reports and Receiver's reports.
3. The purpose of this report ("Third Report") is to advise the Court with respect to the following matters:
 - Sale of the Hotel formerly owned by the Company
 - Receiver's Borrowings
 - Ongoing Matters

- Outline of Priority Claims
- Receiver's Interim Statement of Receipts and Disbursements
- Credit Union claims and security
- The Interim Receiver's, the Receiver's and its counsel's fees and disbursements
- Proposed Interim distribution by the Receiver

Sale of the Hotel

4. The Receiver entered into an agreement to sell the property subject of the receivership. The sale approval application was initially opposed by the investors in the Company, and was at first adjourned. A competing offeror then attended in Court, and the original offeror opposed the competing offeror's standing. Ultimately, on April 13, 2011, the Court granted an Order ("Sale Approval Order") approving the sale of the property to Northland Properties Corporation (the original offeror) at an increased price of \$5,810,000. A copy of the sale purchase agreement is attached as Appendix A to the Receiver's First Report to the Court.
5. The Sale Approval Order provides, among other matters, as follows:
 - (a) the Receiver was authorised to pay from the proceeds of the sale all items subject to adjustment, the commission to the realtor that had been engaged by the Receiver and any borrowings of the Receiver, with the remaining balance to then be dealt with in accordance with any further order of the Court; and
 - (b) the sale proceeds would stand in the place and stead of the sold assets.
6. The Receiver concluded the sale to Northland Properties Corporation on May 3, 2011. The Receiver's counsel was under the terms of the sale purchase agreement required to hold, and not to distribute to the Receiver, the sale proceeds until title issued in the purchaser's name, which occurred on May 16, 2011. The net sale proceeds, after closing adjustments, totalled \$5,663,762.32, and were deposited to the Receiver's trust account.
7. Northland Properties Corporation took over the operations of the hotel effective the closing date.

Receiver's Borrowings

8. As the hotel operation had been losing money, the Receiver had incurred borrowings of \$450,000. Those borrowings, plus accrued interest, were repaid from the hotel sale proceeds on May 20, 2011.

Ongoing Matters

Funds held by Walsh Wilkins Creighton LLP

9. In the IR's Third Report, the IR referenced the Company's investors having placed \$25,000 in trust with their legal counsel. Those funds related to an adjournment of an October 26, 2010 application by the Plaintiffs to "convert" the interim receivership into a "regular" receivership. The investors had applied to adjourn the receivership application for two weeks, the Court granted the adjournment and the investors placed \$25,000 in trust with their legal counsel in relation to that adjournment. After the appointment of the Receiver on November 24, 2010, the Receiver demanded those funds from the investors' legal counsel, and after numerous communications with that counsel the Receiver applied to Court for an Order to direct the investors' counsel to pay those monies to the Receiver. The Court at that application noted that no order had actually been filed with respect to the receivership application adjournment to specify how the money in trust should be dealt with and held that as the money had not been actually needed during the two week adjournment the money should be returned to the investors.

1135096 Alberta Ltd. ("Alberta Ltd.")

10. The IR's First Report dated September 15, 2010 reported that a substantial amount of mortgage funds advanced by Servus Credit Union Ltd. to Squamish JV were diverted to other ventures and legal entities controlled by the principal founders and participants of Squamish JV. The Company's general ledger reported that Alberta Ltd. owed Squamish JV the sum of \$1,701,542.26 as at August 31, 2010.
11. The Receiver made an application to the Court of Queen's Bench of Alberta, and a Bankruptcy Order was granted effective May 12, 2011 which adjudged Alberta Ltd. bankrupt, and appointed MNP Ltd. as trustee ("Trustee") of that bankrupt Estate, subject to affirmation by the creditors. Attached as **Appendix A** to this report is the Trustee's Preliminary Report dated June 01, 2011 in the matter of the bankruptcy of Alberta Ltd. The enclosed report references the sum of approximately \$1.5 million as held by the Court. Those funds (in the total amount of \$1,544,802.90 including interest) have been released to the Alberta Ltd's bankruptcy Trustee and that Trustee currently holds \$1,448,259.51, pending resolution of the claims which have been made against those funds
12. The Receiver agreed to indemnify the Trustee for the Trustee's reasonable fees and disbursements incurred in the administration of the Alberta Ltd. bankrupt estate. This indemnity was needed to effect the Alberta Ltd. bankruptcy and through it protect the interest of Squamish JV as a creditor of the estate of Alberta Ltd.
13. The Receiver has filed an unsecured claim in the Alberta Ltd. bankruptcy in the amount of \$1,701,542.26 (being the Company's earlier referenced claim for \$1,701,542.26). It

would be premature to estimate the recovery in the bankruptcy, as several parties (lien claimants against the now sold Company's property in Squamish, British Columbia) have asserted priority claims against the net proceeds realized from the sale of Alberta Ltd.'s assets. Some of those parties also sought a document production Court Order against the Receiver (which application was for the most part dismissed). The issues surrounding the claims in the Alberta Ltd. bankruptcy remain unresolved and accordingly the Receiver proposes to hold, from any distribution, sufficient funds to cover the potential cost of the referenced indemnity to the Trustee.

Outline of Priority Claims

14. The Receiver has identified the following priority and potential priority claims against the Company assets which have been sold (and now against the proceeds of such sale):
 - (a) Canada Revenue Agency ("CRA") notified the Receiver in January 2012 that \$59,255.00 was owed by the Company as a deemed trust claim relating to unremitted payroll source deductions. To the Receiver's understanding this claim would have priority with respect to personal property of the Company;
 - (b) CRA notified the Receiver in January 2012 that \$23,197.00 was owed by the Company as a deemed trust claim relating to unremitted Goods and Services Tax and Harmonized Sales Tax ("GST" and "HST"). To the Receiver's understanding this claim would have priority with respect to personal property of the Company; and
 - (c) Worksafe BC notified the Receiver in March 2011 that \$5,516.37 had been assessed against the Company as unpaid assessments pursuant to the *Workers' Compensation Act*. To the Receiver's understanding this claim would have priority with respect to all property of the Company.
15. Prior to the sale of the hotel, the Receiver provided written notice of termination of employment to all employees of the Company, and paid all employees for their service up to the closing date. Neither Service Canada nor any employees have filed claims with the Receiver pursuant to the *Wage Earner Protection Program Act*, and 81.4 of the *Bankruptcy and Insolvency Act*. The Receiver is not aware of any amounts owing on a priority basis to former employees.

Receiver's Interim Statement of Receipts and Disbursements

16. Attached as **Appendix B** to this report is a copy of the Receiver's Interim Statement of Receipts and Disbursements for the period ended January 16, 2012. The Receiver held a balance of \$4,729,476 in its trust account at that date.

17. In terms of anticipated future receipts, the Receiver expects to receive:
- (a) \$25,092.22 from the estate of Alberta Ltd.. These funds relate to the costs associated with the bankruptcy petition filing and hearing and their payment was ordered by the bankruptcy Order
 - (b) a refund of Harmonized Sales Tax from Canada Revenue Agency of approximately \$64,000 which reflects the excess of HST paid over HST collected to January 16, 2012 in the administration of the receivership; and
 - (c) funds pertaining to the claim filed by the Receiver in the bankruptcy of Alberta Ltd.
18. In terms of anticipated future disbursement and funds available for distribution:
- (a) substantially all of the costs incurred prior to the sale of, and pertaining to the operations of, the hotel have been paid; however, further professional fees will be incurred to the close of the administration by both the Receiver and its counsel;
 - (b) the Receiver may have to pay pursuant to the indemnity which the Receiver provided to the Trustee in the bankruptcy of Alberta Ltd.; and
 - (c) the Receiver proposes to distribute to the Plaintiff Credit Union the sum of \$4,000,000, plus from time to time such additional monies as in the Receiver's view will not be required for the purposes of the receivership.

Credit Union's Claims and Security

19. The Plaintiff Credit Union previously filed an affidavit of Marcel Fizell, an officer of the Credit Union, being an affidavit sworn on July 28, 2010 and filed in this proceeding. In that affidavit Mr. Fizell:
- (a) deposed as to the indebtedness of the Company to the Credit Union and exhibited the applicable loan documentation; and
 - (b) deposed as to the security held by the Credit Union with respect to the Company's obligations to the Credit Union, and exhibited copies of the security held by the Credit Union in that regard.
20. The Receiver's counsel has reviewed Mr. Fizell's affidavit and the debt and security documents exhibited to that affidavit, and has reviewed the applicable land title and personal property registry searches. The Receiver's counsel has provided an opinion to the Receiver that based on that review, and Mr. Fizell's affidavit, the Credit Union's

security granted to it by the Company is enforceable vis-à-vis the Company and its assets.

21. The Credit Union has advised the Receiver that:
 - (a) the Credit Union has commenced an action in Alberta against the guarantors of the Company's obligations to the Credit Union, and a summary judgment application against the guarantors in that action is pending;
 - (b) the guarantors of the Company's obligations to the Credit Union have, conversely, commenced an action in Alberta against the Credit Union in which they assert that their guarantees are not valid and take the position that the Credit Union's underlying loans were predatory or unconscionable. The Credit Union has defended that action and that litigation remains unresolved; and
 - (c) the Credit Union will make an application in this proceeding for a declaration of the amount owing to and secured in favour of the Credit Union, and for a direction that the Receiver be at liberty to pay to the Credit Union the sum of \$4,000,000.00, plus from time to time such additional monies as in the Receiver's view will not be required with respect to the matters subject of the receivership.
22. The guarantors referenced in subparagraph 21(b) had previously sought the Receiver's consent to sue the Credit Union in the name of the Company. The Receiver did not grant such consent and to the Receiver's understanding the Company is not a party to either of the Court actions referenced in paragraph 21.

Fees and Disbursements of the Interim Receiver, Receiver and Receiver's counsel

23. It has not been the practice of MNP Ltd. for a number of years to capture information relating to, and to bill individually for, expenses such as regular telephone charges, photocopying, faxes, scanning, postage and similar. Rather, to cover its costs related to such items, MNP Ltd. charges an "administrative expense" equal to 5% of the fees for professional services. MNP Ltd. concluded some time ago that this percentage-based administrative expenses recovery would, on average, achieve the same result as recovering the costs related to the referenced items through a detailed transaction-measurement system, at considerably less complexity. MNP Ltd.'s administrative disbursements in this matter are reflected in the accounts summaries as set out below. Where MNP Ltd. incurs out of the ordinary disbursements, those are charged as specific disbursements. MNP Ltd.'s specific disbursements in this matter are reflected in the accounts summaries as set out below
24. Attached as appendices to this report are true copies of the following:
 - (a) Appendix C – summary of the Interim Receiver's invoice for fees, disbursements and administrative expenses with respect to services rendered to November 24, 2010. As set out in that appendix, the fees relating to the services provided by the

Interim Receiver during the applicable time totalled \$113,597.20, specific disbursements totalled \$2,541.84 and administrative expenses totalled \$5,806.95, before taxes. All fees were charged at the Interim Receiver's standard hourly rates from time to time;

- (b) Appendix D - summary of the Receiver's invoices for fees, specific disbursements and administrative expenses with respect to services rendered from November 24, 2010 to October 31, 2011. As set out in that appendix:
 - (i) the fees relating to the services provided by the Receiver with respect to the operation of the hotel during the time period up to its sale totalled \$141,816.50;
 - (ii) the fees relating to the services provided by the Receiver other than with respect to the operation of the hotel totalled \$169,680.90;
 - (iii) specific disbursements totalled \$1,952.49 and administrative expenses totalled \$15,672.49, before taxes.

All fees were charged at the Receiver's standard hourly rates from time to time.

- (c) Appendix E – summary of the time spent by the officers and employees of the Interim Receiver during the applicable time. As set out in that appendix, the total hours relating to the services provided by the officers and employees of the Interim Receiver during the applicable time period totalled 285.70 hours;
- (d) Appendix F – summary of the time spent by the officers and employees of the Receiver during the applicable time. As set out in that appendix:
 - (i) the total hours relating to the services provided by the Receiver with respect to the operation of the hotel during the time period up to its sale totalled 605.35 hours;
 - (ii) the total hours relating to the services provided by the Receiver other than with respect to the operation of the hotel totalled 460.95 hours,for a total of 1,066.30 hours;
- (e) Appendix G - summary of the accounts of Fasken Martineau DuMoulin LLP ("Faskens"), general counsel to the Receiver, with respect to services rendered to October 31, 2011. As set out in that appendix, the fees relating to the legal services provided by Faskens during the applicable time totalled \$113,890.90 and the disbursements totalled \$3,701.18, before taxes. Faskens have advised that all fees were charged at standard hourly rates from time to time;

- (f) Appendix H - Duncan & Craig LLP (“Duncan & Craig”), counsel to the Receiver in matters involving the lawsuit against Alberta Ltd. for the monies owed to the Company and involving the bankrupting of Alberta Ltd.. As set out in that appendix, the fees relating to the legal services provided by Duncan & Craig during the applicable time totalled \$26,160.00 and the disbursements totalled \$3,422.89, before taxes. This appendix also reflects the amount to be paid to the Receiver from the Alberta Ltd. bankruptcy, as referred to earlier in this report, as that amount to be paid to the Receiver relates to the costs incurred by the Receiver in relation to the Alberta Ltd. bankruptcy. Duncan & Craig have advised that all fees were charged at standard hourly rates from time to time;
- (g) Appendix I - summary of the time expended by the partners and employees of Faskens acting as counsel to the Receiver to October 31, 2011. As set out in that appendix, during that time the total time spent by the partners and employees of Faskens during the applicable time totalled 230.68 hours;
- (h) Appendix J – summary of time expended by the partners and employees of Duncan & Craig acting as counsel to the Receiver in relation to the matters involving Alberta Ltd. as earlier referred to. As set out in that appendix, during that time the total time spent by the partners and employees of Duncan & Craig during the applicable time totalled 79.60 hours.

Proposed Distribution and Approval of Accounts

25. The Receiver seeks a Court Order granting:
- (a) liberty to the Receiver to pay to CRA such amounts as CRA advises the Receiver are owed by the Company to CRA on account of unremitted payroll source deductions (under the Income Tax Act and other statutes which deal with employment source deductions) which have the benefit of deemed trust priority under the *Income Tax Act*;
 - (b) liberty to the Receiver to pay to CRA such amounts as CRA advises the Receiver is owed by the Company to CRA on account of unpaid GST and HST obligations which have the benefit of deemed trust priority under the *Excise Tax Act*;
 - (c) liberty to the Receiver to pay to Worksafe BC such amounts as Worksafe BC advises the Receiver is owed by the Company to Worksafe BC on account of assessments under the *Workers' Compensation Act*;
 - (d) approval of the Receiver's interim statement of receipts and disbursements attached as Appendix B to this report;
 - (e) approval of the Interim Receiver's fees and disbursements as set out in Appendix C to this report;

- (f) approval of the Receiver's fees and disbursements as set out in Appendix D to this report;
 - (g) approval of the Receiver's counsel's fees and disbursements as set out in Appendix G and Appendix H to this report;
26. As stated earlier, the Receiver has been advised by the Credit Union that the Credit Union will make an application for a declaration of the amount owing to and secured in favour of the Credit Union, and for a direction that the Receiver be at liberty to pay to the Credit Union the sum of \$4,000,000.00, plus from time to time such additional monies as in the Receiver's view will not be required with respect to the matters subject of the receivership. The Receiver will make payment in accordance with an Order granted pursuant to such Credit Union application.

All of which is respectively submitted this 24 day of February, 2012.

MNP Ltd. (formerly Meyers Norris Penny Limited)
in its capacity as Receiver of Squamish JV Ltd.
and not in its personal or corporate capacity



Ian P. Mackin, CA, CIRP, Trustee
Senior Vice President

District of Alberta
 Division No: 02 - Calgary
 Court/Estate No: 25-094159



MEYERS NORRIS PENNY LIMITED

**IN THE MATTER OF THE BANKRUPTCY OF
 1135096 ALBERTA LTD.**

TRUSTEE'S PRELIMINARY REPORT

BACKGROUND

1. 1135096 Alberta Ltd. (the "Company") formerly operated a Days Inn & Suites and/or Holiday Inn hotel in Strathmore, Alberta.
2. The Company was adjudged bankrupt pursuant to an order granted by the Court of Queen's Bench of Alberta (the "Court") on May 12, 2011 (the "Bankruptcy Order") and Meyers Norris Penny Limited was appointed Trustee of the Estate (the "Trustee").

CONSERVATORY AND PROTECTIVE MEASURES

3. All of the assets of the Company were sold in early 2011 and therefore no conservatory or protective measures were required.
4. The Trustee will be obtaining the Company's books and records from the Company's former bookkeeper.

ASSET REALIZATION AND PROJECTED DISTRIBUTION

5. As at the date of bankruptcy the realizable assets of the Company consisted of the net proceeds (approximately \$1.5 million) realized from the sale of the Company's assets. These funds are currently held in trust by the Court and are to be released to the Trustee once the appeal period pertaining to the granting of the Bankruptcy Order has expired.
6. Due to the contingent nature of certain creditors' claims against the Company, the Trustee is not able to provide a projected distribution at this time.

SUMMARY OF CLAIMS

7. Below is a summary of claims contained in the Company's Statement of Affairs:

Description	Amount (\$)
Deemed Trust	21,635.03
Secured	1,305,477.22
Preferred	-
Unsecured	2,142,732.38
Contingent	1.00
	<u>3,469,845.63</u>

8. Below is a summary of proven claims as at 12:00 pm (noon) on June 1, 2011:

Description	Amount (\$)
Deemed Trust	-
Secured	-
Preferred	-
Unsecured	1,925,544.24
Contingent	-
	<u>1,925,544.24</u>

SECURED CREDITORS AND DEEMED TRUST CLAIMS

9. There are eight parties claiming as secured creditors and, if the claims are valid, would rank in priority to the claims of unsecured creditors.
10. Claims that may rank in priority to the claims of the secured creditors include claims of Canada Revenue Agency ("CRA") with respect to unremitted employee source deductions.

LEGAL

11. Subject to approval of the Inspectors (if appointed), the Trustee has retained Gowling Lafleur Henderson LLP as legal counsel.

REVIEW OF TRANSACTIONS

12. The Trustee has not obtained the Company's books and records and therefore cannot comment on whether there are any transactions that would constitute a preference or transfer at undervalue as defined under the *Bankruptcy and Insolvency Act*.

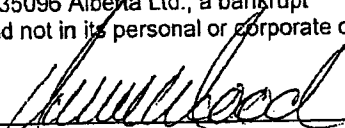
OTHER

13. Meyers Norris Penny Limited was appointed by the Court as Receiver of Squamish JV Ltd., an unsecured creditor of the Company. Any claim filed by Squamish JV Ltd. – In Receivership as against the bankrupt Estate will be subject to review by Inspectors and/or the Court.
14. In order to indemnify the Trustee's reasonable fees and disbursements, Squamish JV Ltd. by its Court appointed Receiver, Meyers Norris Penny Limited, provided a third party guarantee (the "Indemnity"). The Indemnity is not transferable in the event a substitute trustee is appointed as Trustee of the Company.

Dated at Calgary, Alberta this 1st day of June, 2011.

MEYERS NORRIS PENNY LIMITED

In its capacity as Trustee of the Estate of
1135096 Alberta Ltd., a bankrupt
And not in its personal or corporate capacity


Verne Wood, CA - CIRP
Senior Vice President

Appendix B

**In the Matter of the Receivership of Squamish JV Ltd.
Interim Statement of Receipts and Disbursements
For the Period November 24, 2010 to January 16, 2012**

Receipts

Hotel revenue	\$ 351,755
Interest income	24,705
Receiver's borrowings	450,000
Proceeds from sale of hotel	<u>5,810,000</u>
	<u>6,636,460</u>

Disbursements

Wages, benefits and contract labour	219,365
WCB	2,465
Supplies	11,539
Breakfast bar	12,820
Franchise fees	14,464
Cable, telephone and internet	9,823
Bank charges and CC commissions	5,153
Office at the hotel	6,289
Repairs and maintenance	5,526
Deficiencies - critical	92,655
Memberships and dues	873
Advertising and promotion	1,343
Waste removal	1,610
Electricity	12,713
Natural gas	8,396
Water and sewer	7,462
Leases for equipment	32,399
Insurance and licences	16,718
Property taxes (2011)	31,630
Revenue consultant	6,000
Appraisal	13,222
Legal fees	147,785
Interest on receiver's borrowings	9,728
Receiver's fees	327,170
Commission to realtor	116,200
HST, net	64,285
Receiver's borrowings	<u>450,000</u>
Receivership disbursements	<u>1,627,633</u>
Pre-receivership costs	
Leases and miscellaneous	36,041
Property taxes and utilities (2010)	120,849
Interim receivership fees	119,404
Disbursements	<u>3,057</u>
Pre-receivership costs	<u>279,351</u>
	1,906,985
Excess of receipts over disbursements	<u><u>\$ 4,729,476</u></u>

APPENDIX C

Summary of Fees and Disbursements – Interim Receiver

Time Period	Fees (\$)	Specific Disbursements (\$)	Administrative Expenses (\$)	Taxes (\$)	Total (\$)
August 31, 2010 to November 24, 2010	113,597.20	2,541.84	5,806.95	14,633.52	136,579.51
Totals	\$113,597.20	\$2,541.84	\$5,806.95	\$14,633.52	\$136,579.51

APPENDIX D

Summary of Fees and Disbursements – Receiver

Time Period	Fees (\$)	Specific Disbursements (\$)	Administrative Expenses (\$)	Taxes (\$)	Total (\$)
November 24, 2010 to May 4, 2011 (see Note below)	234,749.75	1,544.13	11,814.69	29,773.03	277,881.60
May 5, 2011 to August 22, 2011	59,119.25	402.84	2,976.10	7,499.78	69,997.97
August 23, 2011 to October 31, 2011	17,628.40	5.52	881.70	2,221.87	20,737.49
Totals	\$311,497.40	\$1,952.49	\$15,672.49	\$39,494.68	\$368,617.06

Note – the referenced fees relating to:

(a) services relating to the operation of the hotel totalled	\$141,816.50
(b) services other than relating to the operation of the hotel totalled	\$92,933.25
	\$234,749.75

APPENDIX E

Summary of Time – Interim Receiver

(in relation to the fees and disbursements referenced in Appendix C)

CONSOLIDATED TIME BY PROFESSIONAL

Professional	Title	Average Rate / Hour (rounded to the nearest dollar) (\$)	No. of Hours	Amount (\$)
Ian Mackin	Trustee	425	125.70	53,422.50
Verne Wood	Trustee	475	2.50	1,187.50
Katherine Bujold	Trustee	370	3.90	1,443.00
Patty Wood	Trustee	425	16.80	7,140.00
Craig Donnelly	Partner	425	108.75	46,218.75
Eric Sirrs	Senior Manager	370	0.6	222.00
Kathie Daniels	Manager	280	0.2	56.00
Cheryl Carson	Analyst	150	6.40	960.00
Michael Wong	Analyst	150	16.80	2,520.00
Li Jiang	Analyst	150	0.6	90.00
Sheila Russell	Administrator	95	2.4	228.00
Elizabeth Chen	Administrator	131	0.2	26.20
Sabrina Rivera	Administrator	95	0.6	57.00
Florence Lau	Administrator	105	0.25	26.25
Totals			285.70	\$113,597.20

APPENDIX F

Summary of Time – Receiver

November 24, 2010 to May 4, 2011

(consolidated time by professional relating to services related to operation of the hotel)

Professional	Title	Average Rate / Hour (rounded to the nearest dollar) (\$)	No. of Hours	Amount (\$)
Ian Mackin	Trustee	425	38.50	16,362.50
Katherine Bujold	Trustee	370	0.20	74.00
Patty Wood	Trustee	425	75.40	32,045.00
Grant Bazian	Trustee	475	0.30	142.50
Lana Gilbertson	Trustee	425	0.60	255.00
Donna Carson	Trustee	425	0.20	85.00
Craig Donnelly	Partner	425	76.20	32,385.00
Heather Weber	Partner	425	0.60	255.00
Eric Sirrs	Senior Manager	370	0.70	259.00
Cheryl Carson	Analyst	150	0.20	30.00
Michael Wong	Analyst	150	70.10	10,515.00
Eucharía Commins	Analyst	150	0.50	75.00
Anna Melo	Analyst	150	298.65	44,797.50
Elizabeth Chen	Administrator	105	42.40	4,452.00
Sabrina Rivera	Administrator	105	0.40	42.00
Jackie Lupino	Administrator	105	0.20	21.00
Jessica Mosluk	Administrator	105	0.20	21.00
Totals			605.35	\$141,816.50

Summary of Time – Receiver

November 24, 2010 to October 31, 2011

(consolidated time by professional relating to services other than operation of the hotel)

Professional	Title	Average Rate / Hour (rounded to the nearest dollar) (\$)	No. of Hours	Amount (\$)
Ian Mackin	Trustee	448	146.00	65,412.50
Katherine Bujold	Trustee	372	0.70	260.50
Patty Wood	Trustee	448	56.90	25,466.50
Grant Bazian	Trustee	475	0.30	142.50
Craig Donnelly	Partner	426	138.45	59,035.50
Cheryl Carson	Analyst	150	2.60	390.00
Anna Melo	Analyst	155	87.80	13,646.00
Elizabeth Chen	Administrator	220	7.00	1,540.00
Sabrina Rivera	Administrator	105	1.30	136.50
Jessica Mosluk	Administrator	105	0.20	21.00
Shirley McDonald	Analyst	160	2.10	336.00
Li Jiang	Analyst	150	0.80	120.00
Connor Kense	Estate Manager	205	14.10	2,890.50
Sheila Russell	Administrator	105	0.40	42.00
Bonnie Dickinson	Administrator	105	0.20	21.00
Christine Charbonneau	Administrator	105	0.10	10.50
Jackie Lupino	Administrator	105	10	105.00
Lori Mayne	Administrator	105	0.90	94.50
Hayley Schubert	Administrator	104	0.10	10.40
Totals			460.95	\$169,680.90

APPENDIX G

Summary of Legal Fees and Disbursements – Fasken Martineau DuMoulin LLP

Tab	Invoice No.	Period Covered	Fees (\$)	Disbursements (\$)	Taxes (\$)	Total (\$)
1	540639	November 25 to December 31, 2010	4,592.50	5.70	551.78	5,149.98
2	550694	January 1, 2011 to January 31, 2011	4,898.50	55.55	594.49	5,548.54
3	555247	February 1 to February 28, 2011	6,868.00	65.60	831.19	7,764.79
4	562960	March 1 to March 31, 2011	20,736.00	1,660.99	2,662.80	25,059.79
5	570766	April 1 to April 30, 2011	29,585.50	549.45	3,611.40	33,746.35
6	572981	May 1 to May 31, 2011	7,373.00	495.33	935.39	8,803.72
7	584596	June 1 to June 31, 2011	2,828.00	9.80	340.54	3,178.34
8	587538	July 1 to July 31, 2011	19,414.90	168.55	22,350.04	21,933.49
9	591752	August 1 to August 22, 2011	445.50	288.35	88.07	821.92
10	599335	August 23 to September 30, 2011	9,574.00	255.76	1,169.13	10,998.89
11	605252	October 1 to October 31, 2011	7,575.00	146.10	926.54	8,647.64
Totals			\$113,890.90	\$3,701.18	\$34,061.37	\$131,653.45

APPENDIX H

Summary of Legal Fees and Disbursements – Duncan & Craig LLP

Invoice No.	Period Covered	Fees (\$)	Disbursements (\$)	Taxes (\$)	Total (\$)
141275	February 16, 2011 to March 31, 2011	4,950.00	721.25	273.56	5,944.81
142792 (see Note below)	March 31, 2011 to May 20, 2011	21,210.00	2,701.64	1,180.58	25,092.22
Totals		\$26,160.00	\$3,422.89	\$1,454.14	\$31,037.03

Note – the amount of invoice no. 142792 will be paid from the distribution to be made in the bankruptcy of 1135096 Alberta Ltd.

APPENDIX I

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

CONSOLIDATED TIME BY PROFESSIONAL

Professional	Position	Average Rate / Hour (rounded to the nearest dollar) (\$)	No. of Hours	Time Value (\$)
John F Grieve	Partner	625	1.80	1,125.00
Marcel J. Peerson	Partner	504	201.30	101,437.50
Vicki Tickle	Associate	325	6.00	1,950.00
Carole Hunter	Associate	475	18.60	8,835.00
Veronika Hamza	Student	180	2.78	500.40
Mayne Young	Paralegal	215	0.20	43.00
Totals			230.68	\$113,890.90

APPENDIX J

Summary of Time – Duncan & Craig LLP

(in relation to legal accounts referenced in Appendix H)

CONSOLIDATED TIME BY PROFESSIONAL

Professional	Position	Average Rate / Hour (rounded to the nearest dollar) (\$)	No. of Hours	Time Value (\$)
Russell A. Rimer	Partner	368	64.50	23,736.00
Natasha Sutherland	Associate	175	13.6	2,380.00
Magdalene Baczynski	Associate	125	1.00	125.00
Amanda Price	Legal Assistant	90	0.1	9.00
Totals (see Note below)			79.60	\$26,250.00

Note – Fees charged were reduced to \$26,160.00 (from \$26,250.00) to avoid duplication