

This is the 1st Affidavit  
of ALAN A. FRYDENLUND, K.C. in this case  
and was made on February 28, 2023

No. H S-1913345  
Vancouver Registry



IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

VANCOUVER CITY SAVINGS CREDIT UNION

Petitioner

And

356746 HOLDINGS INC. doing business as  
THE GEORGE DAWSON INN  
507016 B.C. LTD.  
LUXOR HOLDINGS INC.  
UMEDALLI THOBANI also known as  
UMED THOBANI and TONY THOBANI  
THE ESTATE OF AMINA THOBANI  
MANOHAR ALEXANDER SAVUNDRANAYAGAM  
BLUESHORE LEASING LTD.  
ROYNAT INC.  
1156600 B.C. LTD.  
GROUPEX SYSTEMS CANADA INC.

Respondents

**AFFIDAVIT**

I, ALAN A. FRYDENLUND, K.C., of 2900 – 733 Seymour Street, in the City of Vancouver, in the Province of British Columbia, SWEAR THAT:

1. I am a shareholder of OWEN BIRD LAW CORPORATION, solicitors for the Receiver herein D. Manning & Associates Inc. (the “Receiver”), and as such have personal knowledge of the matters and facts hereinafter deposed to, except where the same are stated to be based upon information and belief, and where so stated I verily believe the same to be true.
2. The members and staff of our firm acting for the Receiver were the following with their respective call dates and hourly rates noted:



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**AFFIDAVIT**

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OWEN BIRD LAW CORPORATION  
P.O. Box 49130  
Three Bentall Centre  
2900 - 595 Burrard Street  
Vancouver, BC V7X 1J5  
Attention: Heather A. Frydenlund  
File No. 23024-0091