FORM 109 (RULE 22-2 (2) AND (7))

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

MAR 28 ENTHE 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:

- 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:

- a. the deponent, 1983 at \$650, recording 29.7 hours;
- b. Tony Anderson, 2012 at \$350 in 2021 and \$375 in 2022, recording 13 hours;
- c. Jocelyn Bellerud, 2012 at \$360, recording 2 hours;
- d. Heather Frydenlund, 2016 at \$270 for 2021 and \$320 for 2022, recording 52.4 hours;
- e. Lucky Johal, 2019 at \$230, recording .70 hours;
- f. Margaret Kwan, paralegal, at \$200, recording 18.5 hours;
- g. Anna Liguori, senior paralegal at \$255, recording .2 hours;
- h. Tasha Lorenzen-Ewing, 2022 at \$200, recording .9 hours;
- i. Patrick Weafer, 2018 at \$230, recording 15.8 hours; and
- j. Jennifer Williams, 2003 at \$395, recording 70.3 hours.
- 3. I have reviewed the time entries recorded for this matter and believe them to be accurate and necessary to perform the professional services required by the Receiver.
- 4. I anticipate that professional fees and disbursements for matters relating to and including the passing of the Receiver's accounts and discharge to be \$7,000 inclusive of disbursements and taxes.
- 5. I swear this affidavit in support of a summary passing of the Receiver's accounts.

SWORN BEFORE ME at Vancouver, B.C., this 28 day of February, 2023.

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A Commissioner for taking Affidavits

within British Columbia

ALAN A. ARYDENLUND, K.C.

HEATHER A. FRYDENLUND

Barrister & Solicitor
P.O. Box 1
2900-733 SEYMOUR STREET
VANCOUVER, B.C. V6B 0S6
(604) 691-7532

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AFFIDAVIT

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