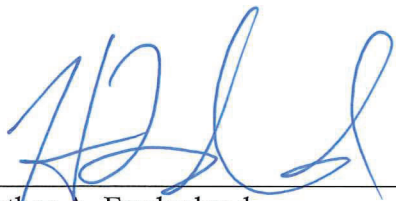


CERTIFICATE

RE: Affidavit #1 of Alan A. Frydenlund, Q.C., sworn February 28, 2022

I, Heather A. Frydenlund, lawyer of 2900-595 Burrard Street, Vancouver, British Columbia, commissioned the above-noted Affidavit of Alan A. Frydenlund, Q.C., on February 28, 2022 in accordance with the Notice of the Profession on the remote commissioning of affidavits for use in civil and family proceedings during the COVID-19 pandemic issued by the Supreme Court of British Columbia, COVID-19 Notice No. 2 on March 27, 2020 (the "Notice").

I am satisfied that the process set out in the Notice was necessary because it was impossible or unsafe, for medical reasons, for the deponent and the commissioner to be physically present together.



Heather A. Frydenlund
Date: March 2, 2022



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

This is the 1st Affidavit of ALAN A. FRYDENLUND, Q.C. in this case and was made on February 28, 2022

No. H 200252
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

VANCOUVER CITY SAVINGS CREDIT UNION

Petitioner

And

371392 B.C. LTD.
371392 B.C. LTD. doing business as DIAMOND HEAD MOTOR
INN and DIAMOND HEAD MOTEL
1134365 B.C. LTD.
H.D.P. HOLDINGS INC.
FARHEEN RAWJI
DIPTI PANCHAL
HITESH PANCHAL
ALL TENANTS AND OCCUPIERS OF THE SUBJECT
LANDS

Respondents

AFFIDAVIT

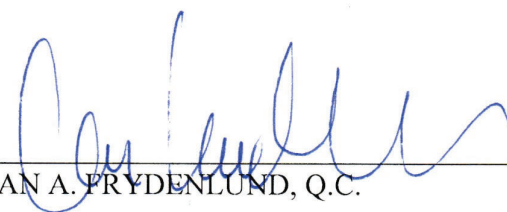
I, ALAN A. FRYDENLUND, Q.C., of 2900 – 595 Burrard Street, in the City of Vancouver, in the Province of British Columbia, SWEAR THAT:

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:

- a. the deponent, 1983 at \$650, recording 67.90 hours;
 - b. Heather Frydenlund, 2016 at \$270 for 2020 and 2021 and at \$320 for 2022, recording 85.90 hours;
 - c. Jennifer Williams, 2003 at \$395, recording 45.90 hours;
 - d. Anna Liguori, senior paralegal at \$255 recording 1 hour; and
 - e. Margaret Kwan, paralegal at \$200, recording 10 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 from the date of this Affidavit to matters relating to and including the passing of the Receiver's accounts and discharge to be \$10,000 inclusive of disbursements and taxes.
 5. I swear this affidavit in support of a summary passing of the Receiver's accounts.
 6. I was not physically present before the commissioner but was linked with the commissioner utilizing video technology. I followed the process described in the B.C. Supreme Court Notice to the Profession, the Public and Media Re: Affidavits for use in Civil and Family Proceedings dated March 20, 2020.

SWORN BEFORE ME at Vancouver,)
 B.C., this 28 day of February, 2022.)
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)

A Commissioner for taking Affidavits
 within British Columbia



ALAN A. FRYDENLUND, Q.C.



No. H-200210
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH
COLUMBIA**

No. H 200252
Vancouver Registry

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Petitioner

AND:

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ALL TENANTS AND OCCUPIERS OF THE SUBJECT
LANDS

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. 23024-0095

This is the 1st Affidavit
of ALAN A. FRYDENLUND, Q.C. in this case
and was made on February 28, 2022

No. H 200252
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

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Respondents

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SWORN BEFORE ME at Vancouver,)
 B.C., this 28 day of February, 2022.)

[Handwritten Signature]

 A Commissioner for taking Affidavits
 within British Columbia

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 ALAN A. FRYDENLUND, Q.C.

HEATHER A. FRYDENLUND
 Barrister & Solicitor
 P.O. Box 49130
 2900-595 BARRARD STREET
 VANCOUVER, B.C. V7X 1J5
 (604) 691-7532

HF

No. H-200210
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**IN THE SUPREME COURT OF BRITISH
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