



The is the 3rd Affidavit of Scott R. Andersen
in this case and was made on February 24, 2026

ACTION NO. S1913131
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

MICHAEL NEIL STREET and MARIELLE JACQUELINE
ANGELLA BRULE

PLAINTIFFS

AND:

SATHER RANCH LTD. by its Court Appointment Receiver
and Manager, C. Cheveldave & Associates Ltd.

DEFENDANT

AFFIDAVIT

I, Scott R. Andersen, Barrister and Solicitor, of Suite 1800 – 1631 Dickson Avenue, in the City of Kelowna, 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 C. Cheveldave & Associates Ltd., the Court Appointed Receiver and Manager (the "**Receiver**") of all assets, undertakings and property of Sather Ranch Ltd. (the "**Company**"), 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. I am authorized by Lawson to swear this Affidavit in support of the taxation and approval of its accounts referred to herein. I swear this Affidavit to supplement my Affidavit #2 sworn and filed herein. My Affidavit #2 inadvertently excluded Lawson's invoices rendered in 2021, which also need to be taxed herein.

3. True copies of all of the accounts rendered by Lawson to the Receiver from January 1, 2021 to December 31, 2025 (the “Accounts”) were attached as Exhibit “C” to the Affidavit #5 of Cecil Cheveldave. A table summarizing the Accounts is set out below.

Invoice No.	Date	Fees	Disbursements	Taxes	Total
705806	2/7/2021	\$4,265.00	\$41.10	\$513.51	\$4,819.61
708888	3/10/2021	\$14,719.50	\$109.30	\$1,771.82	\$16,600.62
711070	4/9/2021	\$28,177.50	\$1,463.63	\$3,453.70	\$33,094.83
713431	5/10/2021	\$2,850.00	\$52.43	\$343.82	\$3,246.25
716618	6/10/2021	\$1,987.50	\$232.70	\$245.65	\$2,465.85
718809	7/9/2021	\$4,043.50	\$111.10	\$486.79	\$4,641.39
720604	8/4/2021	\$3,937.50	\$65.40	\$475.78	\$4,478.68
723360	9/8/2021	\$450.00		\$54.00	\$504.00
728244	11/2/2021	\$900.00		\$108.00	\$1,008.00
730917	12/3/2021	\$1,200.00		\$144.00	\$1,344.00
733796	12/31/2021	\$1,875.00		\$225.00	\$2,100.00
737155	2/9/2022	\$2,587.50	\$145.10	\$313.77	\$3,046.37
739020	3/2/2022	\$1,162.50	\$14.00	\$140.21	\$1,316.71
742705	4/12/2022	\$2,925.00	\$49.80	\$353.49	\$3,328.29
745238	5/11/2022	\$15,588.50	\$801.24	\$1,896.69	\$18,286.43
750158	7/5/2022	\$13,910.00	\$1,634.55	\$1,748.90	\$17,293.45
753225	8/4/2022	\$975.00	\$7.00	\$117.35	\$1,099.35
1201594	10/18/2022	\$18,040.00	\$186.57	\$2,172.03	\$20,398.60
1204587	11/3/2022	\$3,160.00	\$7.00	\$379.55	\$3,546.55
1208136	12/6/2022	\$20,005.00	\$2,224.55	\$2,509.34	\$24,738.89
1210209	12/19/2022	\$120.00	\$0.00	\$14.40	\$134.40
1225335	4/4/2023	\$1,790.00	\$7.80	\$215.19	\$2,012.99
1228534	5/2/2023	\$2,525.00	\$229.30	\$314.47	\$3,068.77
1232812	6/6/2023	\$4,690.00	\$150.29	\$570.31	\$5,410.60
1238434	7/14/2023	\$9,355.00	\$504.29	\$1,147.72	\$11,007.01
1242125	8/2/2023	\$4,602.00	\$578.06	\$581.14	\$5,761.20
1245124	9/11/2023	\$1,960.00	\$218.25	\$246.11	\$2,424.36
1247598	10/5/2023	\$5,041.00	\$512.67	\$630.55	\$6,184.22
1254512	11/8/2023	\$7,685.00	\$162.90	\$930.35	\$8,778.25
1257733	12/4/2023	\$14,555.00	\$267.80	\$1,758.84	\$16,581.64
1262127	12/31/2023	\$13,901.00	\$208.10	\$1,678.14	\$15,787.24
1267904	2/7/2024	\$3,400.00	\$0.00	\$408.00	\$3,808.00
1281633	5/8/2024	\$2,885.00	\$10.20	\$346.71	\$3,241.91
1287150	6/5/2024	\$1,950.00	\$216.90	\$244.86	\$2,411.76
1293892	8/6/2024	\$15,189.50	\$516.50	\$1,848.58	\$17,554.58
1299182	9/9/2024	\$10,495.00	\$62.40	\$1,260.27	\$11,817.67
1304650	10/7/2024	\$2,880.00	\$28.00	\$347.00	\$3,255.00
1307319	11/5/2024	\$1,320.00	\$2.00	\$158.50	\$1,480.50
1313978	12/4/2024	\$7,121.00	\$76.32	\$855.12	\$8,052.44
1318565	12/31/2024	\$9,765.00	\$456.27	\$1,193.63	\$11,414.90
1324537	2/4/2025	\$17,685.00	\$562.03	\$2,146.30	\$20,393.33
1328625	3/12/2025	\$10,470.00	\$164.10	\$1,264.62	\$11,898.72
1333063	4/2/2025	\$2,765.00	\$520.76	\$356.83	\$3,642.59
1339061	5/13/2025	\$4,560.00	\$216.10	\$548.02	\$5,324.12
1341474	6/3/2025	\$26,683.00	\$1,651.49	\$3,272.79	\$31,607.28
1348322	7/21/2025	\$8,430.00	\$565.57	\$1,017.13	\$10,012.70
1353619	8/8/2025	\$3,817.50	\$276.40	\$467.93	\$4,561.83
1356808	9/11/2025	\$3,730.50	\$45.95	\$449.61	\$4,226.06
1360240	9/30/2025	\$810.00	\$0.00	\$97.20	\$907.20
1373294	11/30/2025	\$1,607.00	\$0.00	\$192.84	\$1,799.84
1375074	12/31/2025	\$947.00	\$206.00	\$113.64	\$1,266.64
TOTAL		\$345,493.50	\$15,561.92	\$42,130.20	\$403,185.62

4. Updating the figures from paragraph 4 of my Affidavit #2, the total number of hours recorded in the Accounts was 862.1 in respect of which I recorded 679.8 hours (or 79%). The average hourly rate charged was \$326.05. Except for my time (which was billed at a discounted rate), the accounts were rendered at the timekeeper's standard hourly rates.
5. The particulars of the time spent and work done are set out in the Accounts and for the period 2022 to 2025, further detail is provided in my Affidavit #2. During 2021, we were working in particular on the following tasks:
 - (a) Application materials and court attendances to have the claims process herein approved by the Court and to report to the Court as required;
 - (b) Advising the Receiver regarding the Alberta proceeding commenced by Joseph Sather against Sather Ranch Ltd. (the "**Company**") and a number of other defendants;
 - (c) Preparing materials for the interim taxation of professional fees herein; and
 - (d) Preparing application materials for the Grazing Lands Action (as defined in my Affidavit #2).
6. All of the significant timekeepers in the accounts rendered in 2021 are addressed in my Affidavit #2, except for Alixandra Stoicheff. Ms. Stoicheff is a member in good standing of the Law Society of Alberta and has been so since 2019. Her practice is primary devoted to civil litigation.

7. I swear this Affidavit in support of the taxation of the Accounts.

SWORN BEFORE ME at the City)
of Kelowna, in the Province of)
British Columbia, this 24th day of)
February, 2026)


_____)

A Commissioner for taking Oaths)
for British Columbia)



SCOTT R. ANDERSEN

SAM MCDONALD
Articled Student
LAWSON LUNDELL LLP
1800 - 1631 Dickson Avenue
Kelowna, BC V1Y 0B5