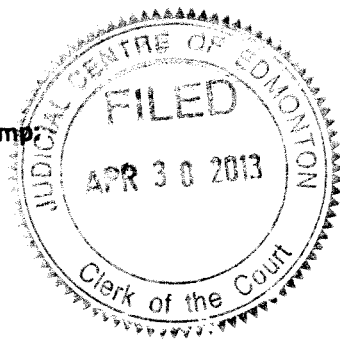


Clerk's Stamp



COURT FILE NUMBER

1303 06092

COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE

EDMONTON

PLAINTIFF

ROYAL BANK OF CANADA

DEFENDANTS

DOWLAND CONTRACTING LTD., DOWLAND
INDUSTRIAL WORKS LTD., DOWLAND
CONSTRUCTION, INC. and 6070 N.W.T. LIMITED

DOCUMENT

AFFIDAVIT OF GARY IVANY

ADDRESS FOR SERVICE AND CONTACT
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DOCUMENT

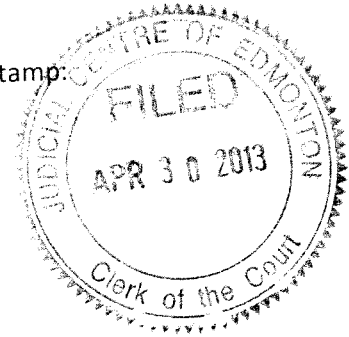
Ray C. Rutman
Dentons Canada LLP
2900 Manulife Place
10180 – 101 Street
Edmonton, Alberta T5J 3V5
Ph. (780) 423-7246 Fx. (780) 423-7276
File No.: 125665-8417/RCR

Sworn on APRIL 29th, 2013

I, Gary Ivany, of the City of Toronto, in the Province of Ontario, MAKE OATH AND SAY THAT:

1. I am a Senior Manager in the Group Risk Management department, employed by Royal Bank of Canada ("RBC"), the Plaintiff in these proceedings and as such have knowledge of the facts and matters hereinafter deposed to by me, except where stated to be based upon information and belief and where so stated I do verily believe the same to be true.
2. RBC is a Bank to which the *Bank Act* (Canada) applies.
3. The Defendants, Dowland Contracting Ltd. ("Contracting"), Dowland Industrial Works Ltd. ("Industrial"), Dowland Construction, Inc. ("Construction") and 6070 N.W.T. Limited ("6070") are customers and/or debtors of RBC. I am the senior manager at RBC directly responsible for the administration of the accounts of the Defendants insofar as concerns the matters raised in the Statement of Claim in these proceedings.
4. I am authorized to make this Affidavit on behalf of RBC.
5. Contracting is a company incorporated pursuant to the laws of the Northwest Territories, which is extra-provincially registered to carry on business in Alberta.

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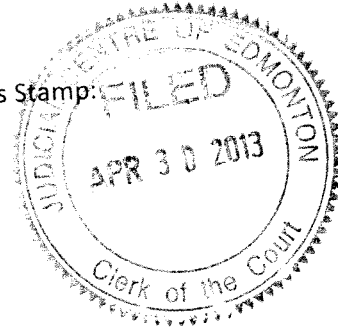
Exhibits to Affidavit of Gary Ivany
sworn April 29, 2013

VOLUME 2 OF 4

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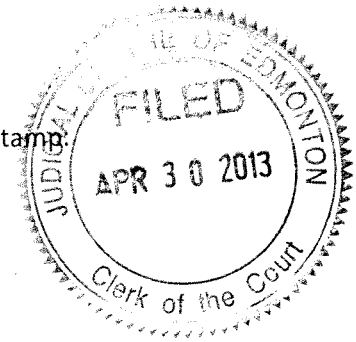
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EDMONTON

PLAINTIFF

ROYAL BANK OF CANADA

DEFENDANTS

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INDUSTRIAL WORKS LTD., DOWLAND
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