



-1-

This is the 1st Affidavit of Nika Vikhrova
in this case and was made on March 15, 2024

No. S-236214
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

1392752 B.C. LTD.

PETITIONER

AND:

SKEENA SAWMILLS LTD.
SKEENA BIOENERGY LTD.
ROC HOLDINGS LTD.

RESPONDENTS

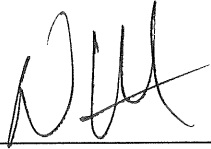
AFFIDAVIT

I, Nika Vikhrova, Legal Assistant, of 1600 - 925 West Georgia Street, Vancouver, in the Province of British Columbia, SWEAR THAT:

1. I am a legal assistant at the law firm of Lawson Lundell LLP, counsel for Petitioner and Cui Family Holdings Ltd. in this matter, and as such have personal knowledge of the matters herein deposed to, except where stated to be based on information and belief, in which case I verily believe them to be true.
2. On March 15, 2024, I visited the website (the "**Website**") of Timber Baron Contracting Ltd. Attached and marked hereto as **Exhibit "A"** is a screenshot of the Website's home page.
3. Attached and marked collectively hereto as **Exhibit "B"** is a screenshot of the Website's "Services" webpage as well as screenshots of each of the services linked to that page.
4. The website also contains a link to a "Projects" webpage (the "**Projects Page**") which list projects for entities such as BC Hydro and Rio Tinto. Attached and marked hereto as **Exhibit "C"** is a screenshot of the Projects Page.

5. The Projects Page also contains links to photo galleries for the listed projects, including those for BC Hydro and Rio Tinto. These photo galleries are attached and marked collectively hereto as **Exhibit "D"**.

SWORN BEFORE ME at the City of
Vancouver, in the Province of British
Columbia, this 15th day of March 2024.



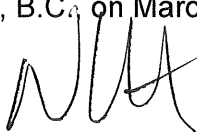
A Commissioner for taking Affidavits for
British Columbia.



NIKA VIKHROVA

NOOR MANN
Barrister & Solicitor
1600 - 925 WEST GEORGIA ST.
VANCOUVER, B.C. V6C 3L2
(604) 685-3456

This is Exhibit "A" referred to in the affidavit
of Nika Vikhrova made before me at
Vancouver, B.C. on March 15, 2024.



A Commissioner for taking Affidavits within
British Columbia.



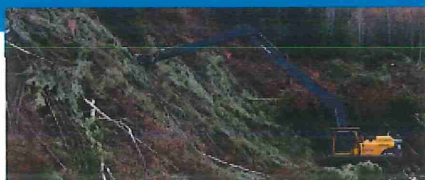
AIR CURTAIN BURNING

TRUST US TO ASSIST YOU WITH YOUR WASTE WOOD DISPOSAL.

TIMBER BARON | FORESTRY SERVICE NORTHERN BC

SPECIALIZED EQUIPMENT AND EXPERT OPERATORS DELIVER EFFICIENT FORESTRY, LAND CLEARING AND AIR CURTAIN BURNING OPERATIONS.

ABOUT US »



30 Years Experience in the Forestry Industry in Northwest BC

Timber Baron Contracting Ltd. was founded in 1986 and is headquartered in Terrace, British Columbia, Canada.

Celebrating our 30th anniversary, Timber Baron has been owned and operated by the Thomson family over two generations. We have a customer-centric philosophy, utilizing our vast experience to provide first-class safety, reliability and professionalism in every aspect. From negotiating, planning, implementing and maneuvering through challenging terrain, we approach every job with precision, competence and expertise.

Years of experience with diverse projects allows us to examine every job in an innovative and cost-effective manner.

Air Curtain Burners - efficient green wood waste burning services.

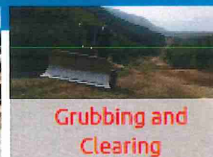
Our latest acquisition of Air Curtain Burners provides further innovation and diversity for our clients, allowing us to provide efficient and green wood waste burning services. Air Curtain Burners have limited smoke emissions and allow us to burn 24 hours when open burning is not permitted due to air quality concerns. We can burn waste wood uninterrupted when other contractors will be limited to favorable venting days which often limit open burning days tremendously in the Northwest BC area.

[Learn More](#) | [View Featured Projects](#)

SERVICES »



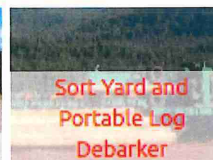
Air Curtain Burners



Grubbing and Clearing



Heavy Hauling



Sort Yard and Portable Log Debarker

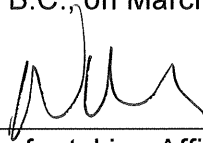


Full Phase Logging



Road Building

This is Exhibit "B" referred to in the affidavit
of Nika Vikhrova made before me at
Vancouver, B.C., on March 15, 2024.



A Commissioner for taking Affidavits within
British Columbia.



HOME ABOUT US SERVICES PROJECTS CONTACT US



Services



ROAD BUILDING

30+ years of experience in the Northwest of British Columbia



HEAVY HAULING

We specialize in transporting oversize, overweight and difficult loads on and off highway.



AIR CURTAIN BURNERS

Environmentally friendly way to dispose of wood waste



GRUBBING AND CLEARING

Timber Baron completed 30km's of Rights of Way for BC Hydro's Northwest Transmission Line



FULL PHASE LOGGING

One stop company for all your forestry needs



SORT YARD AND PORTABLE LOG DEBARKER

Owned and operated sort yards in Prince Rupert, Terrace, Stewart and Haida Gwaii

Services

Air Curtain Burners
Grubbing and Clearing
Heavy Hauling
Sort Yard and Portable Log Debarker
Full Phase Logging
Road Building

CONTACT US

Office: (250) 635-7677
Fax: (250) 638-1757
Email: Mike@timberbaron.ca
Suite 203-4650 Lazelle Ave.
Terrace, BC V8C 1S6

SERVICES

Air Curtain Burners
Grubbing and Clearing
Heavy Hauling
Sort Yard and Portable Log Debarker
Full Phase Logging
Road Building

PROJECTS

Northwest Transmission Line - BC Hydro
Rio Tinto Alcan
Log Sort Yard
Air Curtain Burners and Open Burning



[HOME](#) [ABOUT US](#) [SERVICES](#) [PROJECTS](#) [CONTACT US](#)



OPEN BURNING

24 HOUR BURNING OPERATIONS

Road Building

Timber Baron has the capacity to build large and small scale roads depending on your needs. For 30 years we have built our own forestry roads and recently completed over 20km's of new road construction and 30kms of road upgrade on the Northwest Transmission Line for BC Hydro. If you require any road building or road maintenance please [contact](#) us for a quote.



Services

*Air Curtain Burners
Grubbing and Clearing
Heavy Hauling
Sort Yard and Portable Log Debarker
Full Phase Logging
Road Building*

[CONTACT US](#)

[SERVICES](#)

[PROJECTS](#)



HOME ABOUT US SERVICES PROJECTS CONTACT US



GRUBBING AND CLEARING

STEEP SLOPE AND DIFFICULT TERRAIN EXPERTS

Heavy Hauling

Timber Baron has been in the heavy hauling and lowbedding industry for 20+ years. We have the ability to haul 8-axle loads with substantial experience in remote areas and off-highway terrain.



Services

Air Curtain Burners
Grubbing and Clearing
Heavy Hauling
Sort Yard and Portable Log Debarker
Full Phase Logging
Road Building

AIR CURTAIN BURNING

LARGEST AIR CURTAIN BURNING CONTRACTOR IN WESTERN CANADA

Air Curtain Burners

Timber Baron services have evolved to incorporate waste wood management due to the industries need for environmentally friendly methods to deal and dispose of waste wood and construction materials.

Projected growth in the Northwest BC area in large scale mining and LNG capital project brings with it a growing need for alternative solutions to open burning.

The advantages of using an Air Curtain Burners are numerous and a few are listed below:



- Reduced emissions and smoke impact to local municipalities, communities and wildlife
- Elimination of waste material vs grinding which pulverizes waste and needs to be hauled away or spread causing other environmental implications and concerns
- Contained units reducing fire risk in extreme burning conditions and proximity to communities
- Easy portability allowing the Air Curtain Burners to be moved beside waste material lowering handling costs

These Air Curtain Burners allow for very limited smoke emissions and also allows us to burn 24 hours when open burning is not permitted due to air quality concerns. We can burn waste wood uninterrupted when other contractors will be limited to favorable venting days.

Favourable venting limits open burning days tremendously in the Northwest BC area. When projects are in close proximity to local communities, Air Curtain Burners will alleviate environmental concerns and schedule delays that are inevitable with open burning. Our staff are also trained visible emissions evaluators allowing us to prepare daily reports to our customers and ensure we are adhering to environmental permitting requirements.

Picture of actively burning with Air Curtain Burners at Rio Tinto Alcan Modernization Project. For more pictures please go to the [Photo Gallery](#)

Services

Air Curtain Burners
Grubbing and Clearing
Heavy Hauling
Sort Yard and Portable Log Debarker
Full Phase Logging
Road Building



Grubbing and Clearing

Timber Baron has the equipment and capacity to take on large and small grubbing and clearing projects. With our experienced operators, we always look forward to collaborating with our customers, difficult terrain, and meeting project deadlines.

Click [here](#) to see some of our past projects such as the Northwest Transmission Line where we completed 30km's of right of way clearing our look in our [photo gallery](#).



Services

- [Air Curtain Burners](#)
- [Grubbing and Clearing](#)
- [Heavy Hauling](#)
- [Sort Yard and Portable Log Debarker](#)
- [Full Phase Logging](#)
- [Road Building](#)



HOME ABOUT US SERVICES PROJECTS CONTACT US



AIR CURTAIN BURNING

TRUST US TO ASSIST YOU WITH YOUR WASTE WOOD DISPOSAL.

Full Phase Logging

Timber Baron has been in the forestry industry for 30+ years in the Northwest BC area. We are a vertically integrated company that has always strived, and continues, to be innovative in changing markets. With experience in all aspects of the forest industry, let us help you in any or all of your clearing requirements.



Services

Air Curtain Burners
Grubbing and Clearing
Heavy Hauling
Sort Yard and Portable Log Debarker
Full Phase Logging
Road Building



[HOME](#) [ABOUT US](#) [SERVICES](#) [PROJECTS](#) [CONTACT US](#)



SPECIALIZED EQUIPMENT

INNOVATIVE EQUIPMENT FOR DIFFICULT TERRAIN

Sort Yard and Portable Log Debarker

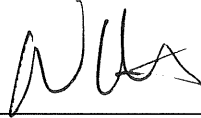
Timber Baron boasts a custom built 30" Cambio ring debarker that is portable - with setup in almost any location. Over the years, we have debarked and exported in excess of 5,000 sea containers to Asia and can assist in any of your log debarking or log marketing requirements. Check out photos in our [gallery](#).



Services

*Air Curtain Burners
Grubbing and Clearing
Heavy Hauling
Sort Yard and Portable Log Debarker
Full Phase Logging
Road Building*

This is Exhibit "C" referred to in the affidavit
of Nika Vikhrova made before me at
Vancouver, B.C., on March 15, 2024.



A Commissioner for taking Affidavits within
British Columbia.



HOME ABOUT US SERVICES PROJECTS CONTACT US



GRUBBING AND CLEARING

STEEP SLOPE AND DIFFICULT TERRAIN EXPERTS

Projects



AIR CURTAIN BURNERS AND OPEN BURNING



LOG SORT YARD



RIO TINTO ALCAN



NORTHWEST TRANSMISSION LINE - BC HYDRO

Projects

Northwest Transmission Line - BC Hydro
Rio Tinto Alcan
Log Sort Yard
Air Curtain Burners and Open Burning

CONTACT US

Office: (250) 635-7677
Fax: (250) 638-1757
Email: Mike@timberbaron.ca
Suite 203-4650 Lazelle Ave.
Terrace, BC V8G 1S6

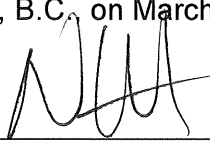
SERVICES

Air Curtain Burners
Grubbing and Clearing
Heavy Hauling
Sort Yard and Portable Log Debarker
Full Phase Logging
Road Building

PROJECTS

Northwest Transmission Line - BC Hydro
Rio Tinto Alcan
Log Sort Yard
Air Curtain Burners and Open Burning

This is Exhibit "D" referred to in the affidavit
of Nika Vikhrova made before me at
Vancouver, B.C. on March 15, 2024.



A Commissioner for taking Affidavits within
British Columbia.

Northwest Transmission Line - BC Hydro

PHOTO GALLERY



Projects
Northwest Transmission Line - BC Hydro
Rio Tinto Alcan
Log Sort Yard
Air Curtain Burners and Open Burning



Rio Tinto Alcan

PHOTO GALLERY



Projects

*Northwest Transmission Line - BC Hydro
Rio Tinto Alcan
Log Sort Yard
Air Curtain Burners and Open Burning*



No. S-236214
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH
COLUMBIA**

BETWEEN:

1392752 B.C. LTD.

PETITIONER

AND:

SKEENA SAWMILLS LTD.
SKEENA BIOENERGY LTD.
ROC HOLDINGS LTD.

RESPONDENTS

AFFIDAVIT #1 OF NIKA VIKHROVA



Suite 1600 Cathedral Place
925 West Georgia Street,
Vancouver BC V6C 3L2

Phone: 604-685-3456

Attention: Bryan C. Gibbons
bgibbons@lawsonlundell.com