



This is the 1st Affidavit
of Anthony Tillman in this case
and was made on January 22, 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.
AND ROC HOLDINGS LTD.

RESPONDENTS

AFFIDAVIT

I, Anthony Tillman, Licensed Insolvency Trustee, of Suite 902 - 925 West Georgia Street,
Vancouver, British Columbia, SWEAR THAT:

1. I am a Senior Vice-President at Alvarez & Marsal Canada Inc., Licensed Insolvency Trustees ("A&M"), receiver (in such capacity, the "**Receiver**") over the properties, assets and undertakings (collectively, the "**Property**") of Skeena Sawmills Ltd., Skeena Bioenergy Ltd., and ROC Holdings Ltd. (collectively, the "**Skeena Entities**" or the "**Company**") pursuant to the Receivership Order of Madam Justice Blake dated September 20, 2023 made herein, and as such have personal knowledge of the matters deposed to in this affidavit, except where stated to be on information and belief, in which case I verily believe them to be true.

2. I am the Senior Vice-President at A&M that has had primary carriage of this matter, and I am authorized to make this affidavit on behalf of the Receiver in support of its application for an order (the "**Sealing Order**") sealing the contents of the Receiver's First Confidential Report to

Court dated January 19, 2024 (the “**Confidential Report**”), until further order made by the Supreme Court of British Columbia (the “**Court**”).


3. The sale process (the “**Sale Process**”) conducted by the Receiver in respect of the Property commenced on October 31, 2023 and, as at the definitive bid deadline on January 12, 2024, the Receiver received several offers to purchase some or all of the Property.

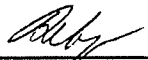
4. The Receiver has reviewed and considered all bids received and prepared the Confidential Report summarizing the results of the Sale Process for review by the Court. The purpose of the Confidential Report is to provide the Court with additional, detailed information regarding the results of the Sale Process to date. It includes the identification of the bidders and details concerning their respective offers, including, but not limited to, the consideration payable thereunder (the “**Commercially Sensitive Information**”).

5. Disclosing the Commercially Sensitive Information would, in the Receiver’s view, be prejudicial to the interests of the Company’s stakeholders, including its creditors, as it has the potential to negatively impact any ongoing or future marketing and sales efforts in respect of the Property.

6. In light of the foregoing, the Receiver seeks to have the Confidential Report filed under seal. The Receiver knows of no party that will suffer prejudice if the Confidential Report is filed under seal.

SWORN BEFORE ME at Vancouver,
British Columbia, on January 22, 2024.


A Commissioner for taking Affidavits for
British Columbia


ANTHONY TILLMAN

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