

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., 0849809 B.C. LTD., DOWLAND CONSTRUCTION INC. AND 6070 N.W.T. LIMITED
DOCUMENT	AFFIDAVIT OF THE RECEIVER
ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	MILLER THOMSON LLP Barristers and Solicitors 2700, Commerce Place 10155-102 Street Edmonton, AB, Canada T5J 4G8 Phone: 780.429.1751 Fax: 780.424.5866
	Lawyer's Name: Rick T. G. Reeson, Q.C. Stephanie Wanke Lawyer's Email: rreeson@millerthomson.com Swanke@millerthomson.com File No.: 182818.1 RTR

**AFFIDAVIT OF TODD MARTIN
SWORN ON JUNE 10, 2019**

I, Todd Martin of Vancouver, British Columbia, SWEAR AND SAY THAT:

1. I am a Senior Vice President of Alvarez & Marsal Canada Inc. ("A&M"), and as such I have personal knowledge of the facts and matters herein deposed to except where stated to be based upon information and belief, and where so stated I verily believe the same to be true.
2. On May 21, 2013, and pursuant to an Order of Associate Chief Justice J. Rooke of the Alberta Court of Queen's Bench, A&M was appointed as Receiver of each of Dowland Contracting Ltd. ("Contracting"), 0849809 B.C. Ltd. ("084"), Dowland Construction Inc., and 6070 N.W.T. Limited (the "Receivership").
3. I am a Chartered Professional Accountant and a Licensed Insolvency Trustee with approximately 30 years of experience in the area of Insolvency and Restructuring, and have been handling the day to day administrative work in relation to the Receivership.
4. With respect to A&M's accounts covering fees and disbursements incurred by A&M for the period May 21, 2013 to May 31, 2019, as referenced in the Receiver's Eighth and Final Report (the "Accounts"):

- (a) The Accounts specifically outline the date, the description of work completed, the length of time taken to complete the work, the total invoiced amount for the work completed and name of the individual who completed the work;
- (b) The Accounts specifically outline the average hourly rate for each and every individual employee of A&M which completed work in regard to the Receivership (the "Hourly Rates"), including Non-Partner Services for Clerical, Administrative or IT employees ("Administrative Fees"), including:

Todd Martin	Senior Vice President/Managing Director	\$600.00
Callum Beveridge	Senior Director	\$475.00
Orest Konowalchuk	Senior Director	\$475.00
Marianna Lee	Associate	\$300.00
Monica Cheung	Executive Assistant	\$100.00

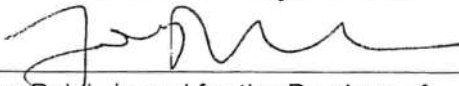
- (c) I submit that the Hourly Rates are reasonable and comparable to the hourly rates of other accountant firms within the City of Edmonton of equivalent competence and expertise in the insolvency area;
- (d) A&M has not invoiced any amounts in the Receivership on a percentage basis, and more specifically, A&M has not invoiced any amounts in the Receivership on a percentage basis in regard to Administrative Fees;
- (e) Any billing by A&M personnel at the same experience level in the Receivership was necessary for the proper administration of the Receivership.
- (f) All disbursements contained within the Accounts are disbursements actually incurred by A&M in the proper administration of the Receivership, and furthermore, all disbursements are set out within the Accounts on an itemized basis. Actual out of pocket disbursements referred in the Receiver's Eight and Final Report total:

Postage and courier fees	<u>\$27.16</u>
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- 5. A&M has not charged an "Administration Charge" of any kind.
- 6. A&M estimates that an additional \$20,000 (plus GST) will be required to fund the administration of the Receivership. A&M estimates that up to \$10,000 (plus GST) will be required to finalize legal fees associated with the Receiver's discharge and approximately \$10,000 (inclusive of GST) will be required to fund long term storage (6 years) of select records and project documentation of Contracting and 084. A&M will not charge any additional fees as Receiver in this proceeding nor has it accrued any fees that require payment hereafter.

7. I make this Affidavit in support of the application to approve the fees and disbursements of A&M which have been rendered by A&M within this Action.

SWORN before me at the City of
Vancouver, in the Province of British
Columbia, this 10th day of June,
2019.


A Notary Public in and for the Province of
British Columbia

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TODD M. MARTIN

FERGUS J.L. MCDONNELL
Barrister & Solicitor
Fasken Martineau DuMoulin LLP
2900 - 550 Burrard Street
Vancouver, BC V6C 0A3
604 631 3131