



This is Affidavit #1  
of Kibben Jackson in this case  
and was made on October 22, 2015

No. S144832  
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

BETWEEN:

BANK OF MONTREAL

PETITIONER

AND:

KATZIE COAST MARINE SERVICES INC.  
KATZIE COAST MARINE OPERATIONS (2009) INC.  
COAST MARINE SERVICES 2004 LTD.  
0818987 B.C. LTD.  
COAST MARINE SERVICES INC.  
KATZIE FIRST NATION BAND

RESPONDENTS

**AFFIDAVIT**

I, Kibben Jackson, of 2900 - 550 Burrard Street, Vancouver British Columbia, lawyer,  
AFFIRM THAT:

1. I am a partner at Fasken Martineau DuMoulin LLP ("**FMD**"), counsel for Deloitte Restructuring Inc. in its capacity as court appointed receiver and manager (the "**Receiver**") of the Respondents Katzie Coast Marine Services Inc., Katzie Coast Marine Operations (2009) Inc., Coast Marine Services 2004 Ltd., 0818987 B.C. Ltd. and Coast Marine Services Inc., and as such have personal knowledge of the facts hereinafter deposed to except where stated to be on information and belief, in which case I verily believe them to be true.
2. I am one of the individuals that had primary carriage of this matter at FMD, and I am authorized to make this affidavit on behalf of FMD.

3. I have reviewed the Third Report of the Receiver, dated October 21, 2015 (the “**Third Report**”), to be filed in these proceedings. Capitalized terms used herein but not otherwise defined have the same meanings as are ascribed to them in the Third Report.

4. Attached hereto and marked as indicated are the following Exhibits (collectively, the “**FMD Invoices**”):

<b>Exhibit</b>	<b>Invoice description</b>	<b>Amount</b>
A	Invoice # 838402 dated August 13, 2014	\$8,066.24
B	Invoice # 844753 dated September 8, 2014	\$7,252.05
C	Invoice # 854919 dated October 16, 2014	\$20,902.13
D	Invoice # 864078 dated November 19, 2014	\$17,943.54
E	Invoice # 876213 dated December 22, 2014	\$8,594.60
F	Invoice # 881664 dated January 19, 2014	\$4,111.80
G	Invoice # 891206 dated January 31, 2015	\$8,130.52
H	Invoice # 901559 dated March 31, 2015	\$6,564.46
I	Invoice # 918072 dated June 2, 2015	\$4,648.81
J	Invoice # 919069 dated June 8, 2015	\$6,567.55
K	Invoice # 928335 dated July 14, 2015	\$504.43
L	Invoice # 936615 dated August 17, 2015	\$4,776.67
M	Invoice # 947505 dated September 24, 2015	\$1,543.93
N	Invoice # 951899 dated October 13, 2015	\$2,175.61

5. As detailed in the FMD Invoices, from June 3, 2014 to September 30, 2015, FMD's invoiced fees amounted to \$88,791.50 and FMD incurred and invoiced for disbursements in the amount of \$2,244.96 and taxes in the amount of \$10,745.88, for a total of \$101,782.34.

6. As at the date of this affidavit, FMD has yet to invoice for additional work in progress, consisting of fees and disbursements of approximately \$2,000 (exclusive of taxes), and estimates that it will generate further fees and disbursements of approximately \$2,500 (exclusive of taxes) to the completion of this matter, assuming the Receiver's application for discharge is not opposed.

7. The work carried out by FMD as counsel to the Receiver in these proceedings includes, but is not limited to, the following:

- (a) assisting the Receiver with the sale of certain vessel assets, including drafting sale agreements, managing the closing of the transaction and managing payment of the sale proceeds;
- (b) liaising with creditors and the Transport Canada Vessel Registry with respect to the discharge of certain marine mortgages;
- (c) preparing for and attending at Court applications for approval of the Receiver's activities and for vesting orders relating to the sale of various assets;
- (d) reviewing and advising on the insurance claim relating to the Miller 309, including communications with the Underwriters and Katzie First Nation;
- (e) negotiating and drafting the Revised Settlement Agreement;
- (f) ongoing communications with creditors and other stakeholders; and
- (g) generally advising the Receiver on legal matters relating to the receivership.

8. To the best of my knowledge, information and belief, the information contained in FMD Invoices as to:

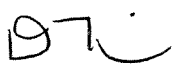
- (a) the number of hours worked;

- (b) the nature of work performed;
- (c) the identity of the individuals who performed work; and
- (d) the rates charged for the work performed,

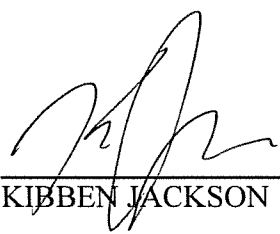
is true and correct in all respects.

9. The fees set out in the FMD Invoices are calculated on the basis of the hours spent by FMD personnel, multiplied by the applicable standard hourly rates charged by FMD. To the best of my knowledge, information and belief, those hourly rates are consistent with those charged by other law firms for work of a similar nature in Vancouver, B.C.

AFFIRMED BEFORE ME at Vancouver, )  
British Columbia, on October 22, 2015 )



\_\_\_\_\_)  
A Commissioner for taking Affidavits for )  
British Columbia )



\_\_\_\_\_)  
KIBBEN JACKSON )

DANIELLE R. TOIGO  
Barrister & Solicitor  
Fasken Martineau DuMoulin LLP  
2900 - 550 Burrard Street  
Vancouver, BC V6C 0A3  
604 631 4783

This is Exhibit A referred to in the  
affidavit of Kibben Jackson  
made before me on this 22  
day of October 20 15

1975  
A Commissioner for taking  
Affidavits for British Columbia

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**FASKEN  
MARTINEAU** 

**Deloitte & Touche LLP**  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

8/13/2014  
Invoice #: 838402  
GST #: 87937 6127 RT0003

Attention: Huey Lee

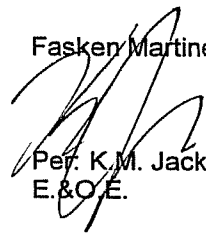
---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**

**For Professional Services rendered through 7/31/2014 as described in the attached memorandum**

Total Fees	\$ 7,067.00
Total Disbursements	144.00
Total Taxes	855.24
<b>Total Amount Owing This Bill</b>	<b>CAD \$ 8,066.24</b>

Fasken Martineau DuMoulin LLP

  
Per: K.M. Jackson  
E.&O.E.

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

Vancouver    Calgary    Toronto    Ottawa    Montréal    Québec City    London    Paris    Johannesburg

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**FASKEN  
MARTINEAU** 

**Deloitte & Touche LLP**  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

8/13/2014  
Invoice #: 838402  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**FEE MEMORANDUM**

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

06/03/14	Review demand letters issued by Bank of Montreal and forwarded by Mr. Verbrugge; K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
06/14/14	Emails exchanged with Mr. Lee regarding issue with respect to cancellation of insurance; review emails exchanged among Mr. Lee, Bank of Montreal and BLG regarding same; K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
06/15/14	Review draft Petition, affidavit and Receivership Order forwarded by Mr. Lee; email to Mr. Lee with comments on draft Receivership Order; K.M. Jackson	Partner	0.50 hrs.	500.00/hr	\$ 250.00
06/16/14	Review email from Mr. Lee providing comments on draft receivership materials; telephone conversation with Mr. Lee regarding issues with respect to insurance, management of operations and receivership generally; telephone conversation and emails exchanged with Mr. Verbrugge regarding same; further telephone conversation with Mr. Lee regarding same; K.M. Jackson	Partner	0.70 hrs.	500.00/hr	\$ 350.00
06/19/14	Review emails forwarded by Mr. Lee regarding timing for receivership and issues with respect to insurance; K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
06/24/14	Review email from Mr. Lee regarding reinstatement of insurance and timing for appointment of receiver; K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
06/25/14	Review amended petition and affidavits in support circulated by Mr. Verbrugge; review draft order and emails exchanged with Mr. Verbrugge and Mr. Lee regarding same; review amended draft order;				

Vancouver    Calgary    Toronto    Ottawa    Montréal    Québec City    London    Paris    Johannesburg

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

	K.M. Jackson	Partner	0.50 hrs.	500.00/hr	\$ 250.00
06/26/14	Review emails from Mr. Verbrugge and Mr. Lee regarding order appointing receiver and issues pertaining to insurance coverage as well as location of assets;				
	K.M. Jackson	Partner	0.30 hrs.	500.00/hr	\$ 150.00
06/27/14	Review emails from Mr. Lee regarding insurance and locating assets of debtors; telephone conversation with Mr. Lee regarding same and regarding assets over which Deloitte appointed receiver; review emails from Mr. Verbrugge and Mr. Walker regarding insurance;				
	K.M. Jackson	Partner	0.40 hrs.	500.00/hr	\$ 200.00
07/02/14	Emails exchanged and conference with Huey Lee regarding various issues relating to location of vessels and insurance coverage in respect of sunk barge, arrested vessel and environmental issues; email from Paul Chambers regarding arrest of vessel and attaching notice of civil claim; review same and email to Paul Chambers and Huey Lee with comments.				
	K.M. Jackson	Partner	1.20 hrs.	500.00/hr	\$ 600.00
07/03/14	Review Receivership Order and law pertaining to environmental liability and obligations of Receiver; emails exchanged with Huey Lee regarding same; conference with Michael Parrish regarding insurance claim and salvage as well as arrest of vessel; telephone conversation with counsel for Imperial Paving regarding arrested vessel and sale of same; emails exchanged with Huey Lee and others regarding foregoing.				
	K.M. Jackson	Partner	1.30 hrs.	500.00/hr	\$ 650.00
07/03/14	Consider and advise upon numerous maritime and insurance law issues including arrest, salvage, jurisdiction and coverage; review pleadings and court order; review case law regarding payment of arrest costs.				
	M.D. Parrish	Partner	1.00 hrs.	440.00/hr	\$ 440.00
07/10/14	Review emails from Huey Lee and Graham Walker regarding insurance claim; email to Huey Lee regarding same.				
	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
07/15/14	Review email from Huey Lee regarding status of insurance claim; review emails forwarded by Huey Lee regarding insurance claim and attaching documents pertaining to same; email to Huey Lee regarding foregoing; telephone conversation with counsel for creditor seeking to arrest ship.				
	K.M. Jackson	Partner	0.50 hrs.	500.00/hr	\$ 250.00
07/21/14	Telephone conversation with Paul Chambers regarding claims by and against Vancouver Sand and Gravel.				



**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

	K.M. Jackson	Partner	0.30 hrs.	500.00/hr	\$ 150.00
07/28/14	Emails with Kibben Jackson regarding draft Request for Particulars with respect to vessels; reviewing and revising same; emails with Huey Lee regarding comments on draft Request for Particulars;				
	Vicki Tickle	Associate	0.60 hrs.	420.00/hr	\$ 252.00
07/30/14	Email from counsel for Imperial Paving with respect to continuation of trial and terms on which receiver to sell vessel; emails exchanged and conferences with Paul Chambers and Magnus Verbrugge regarding same; email to counsel for Imperial Paving providing receiver's response with respect to proposal; review email from Paul Chambers attaching various documents with respect to ongoing dispute with Vancouver Sand and Gravel; telephone conversation with Paul Chambers regarding same; telephone conversation and email from Paul Chambers regarding issue with respect to bank mortgages and amounts secured by same; begin review of security documents and other information forwarded by Paul Chambers.				
	K.M. Jackson	Partner	3.10 hrs.	500.00/hr	\$ 1,550.00
07/31/14	Review tax issues with Kibben Jackson; review additional tax issues with Kibben Jackson.				
	F.S. Schober	Partner	0.50 hrs.	750.00/hr	\$ 375.00
07/31/14	Review and draft amendments to bill of sale forwarded by Paul Chambers; email to Paul Chambers and Huey Lee attaching same with comments; emails exchanged with Frank Schober regarding tax ramifications of sale; email to Paul Chambers and Huey regarding Vancouver Sand and Gravel agreements and issues pertaining to same.				
	K.M. Jackson	Partner	2.20 hrs.	500.00/hr	\$ 1,100.00

**Professional Summary**

<u>Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
F.S. Schober	Partner	750.00	0.50	375.00
K.M. Jackson	Partner	500.00	12.00	6,000.00
M.D. Parrish	Partner	440.00	1.00	440.00
Vicki Tickle	Associate	420.00	0.60	252.00
	<b>Total</b>		<b>14.10</b>	<b>CAD \$ 7,067.00</b>

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

<b>Our Fees</b>	<b>\$ 7,067.00</b>
GST	353.35
BCPST	494.69
Total Fees Including Taxes	<u>\$ 7,915.04</u>

**Disbursements**

<u>Taxable</u>		
06/25/14	Lasercopy	133.20
06/30/14	Lasercopy	6.40
07/28/14	Lasercopy	4.40
Total Disbursements		<u>144.00</u>
GST		7.20
Total Disbursements Including Taxes		<u>151.20</u>

**Total Fees, Disbursements and Taxes** **CAD \$ 8,066.24**

**Tax Summary**

GST	360.55
BCPST	494.69
Total Taxes Included in This Bill	<u>855.24</u>

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**FASKEN  
MARTINEAU** 

**Deloitte & Touche LLP**  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

8/13/2014  
Invoice #: 838402  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**REMITTANCE COPY**  
Please return with your payment

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

**For Professional Services rendered through 7/31/2014 as described in the attached memorandum**

Total Fees	\$ 7,067.00
Total Disbursements	144.00
Total Taxes	855.24
<b>Total Amount Owing This Bill</b>	<b><u>CAD \$ 8,066.24</u></b>

**Tax Summary**

GST	360.55
BCPST	494.69
Total Taxes Included in This Bill	<u>855.24</u>

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

Vancouver    Calgary    Toronto    Ottawa    Montréal    Québec City    London    Paris    Johannesburg

This is Exhibit B referred to in the  
affidavit of Kibben Jackson  
made before me on this 22  
day of October 20 15  
BTI  
A Commissioner for taking  
Affidavits for British Columbia

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**FASKEN  
MARTINEAU** 

**Deloitte & Touche LLP**  
**2800 - 1055 Dunsmuir Street**  
**PO Box 49279**  
**Vancouver, BC V7X 1P4**

9/8/2014  
Invoice #: 844753  
GST #: 87937 6127 RT0003

Attention: Huey Lee

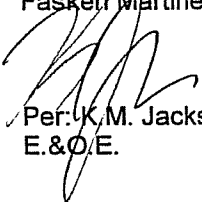
---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**

**For Professional Services rendered through 8/31/2014 as described in the attached memorandum**

Total Fees	\$ 6,129.00
Total Disbursements	379.30
Total Taxes	743.75
<b>Total Amount Owing This Bill</b>	<b><u>CAD \$ 7,252.05</u></b>

Fasken Martineau DuMoulin LLP

  
Per: K.M. Jackson  
E.&O.E.

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

Vancouver    Calgary    Toronto    Ottawa    Montréal    Québec City    London    Paris    Johannesburg

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents



2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**Deloitte & Touche LLP**  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

9/8/2014  
Invoice #: 844753  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**FEE MEMORANDUM**

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

08/01/14	Review email from Paul Chambers providing draft email to Brian Hall with response to proposal in respect of resolution of matters between Vancouver Sand and Gravel and Coastal Marine; email to Paul Chambers attaching revised draft and addressing various issues with respect to same; continue reviewing bank security documents, including mortgages with respect to ships and security for guarantees; conference with Brent Lewis regarding same; instructions to Suzanne Volkow regarding searches to be performed in respect of same.	K.M. Jackson	Partner	1.80 hrs.	500.00/hr	\$ 900.00
08/05/14	Review results of search of Ships Registry in respect of Transporter 2; email to client concerning effect of description of security in registry and matters related to same; emails exchanged with client regarding same and further research to be performed.	K.M. Jackson	Partner	0.70 hrs.	500.00/hr	\$ 350.00
08/06/14	Telephone conversation with counsel for Imperial Paving regarding sale of Malaspina Straits; emails exchanged with client regarding same and email to Jordan Kinghorn regarding same; emails from Paul Chambers regarding additional research with respect to vessels and encumbrances registered against same; instructions to Suzanne Volkow regarding same.	K.M. Jackson	Partner	0.40 hrs.	500.00/hr	\$ 200.00
08/07/14	Review registry searches of vessels; email to Paul Chambers and Huey Lee attaching same and providing comments with respect to encumbrances registered against same.	K.M. Jackson	Partner	0.40 hrs.	500.00/hr	\$ 200.00
08/08/14	Emails exchanged with Paul Chambers regarding encumbrances registered against vessels and possible further investigation regarding bank security; review notice of civil claim filed against Coast Marine by Warrior Marine; email to Paul Chambers and Huey Lee regarding same.					

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

	K.M. Jackson	Partner	0.40 hrs.	500.00/hr	\$ 200.00
08/12/14	Review emails from Paul Chambers attaching draft listing agreement and proposal from Accurate Bailiffs; instructions to Vicki Tickle regarding review of same; email to Paul Chambers regarding same; review results of registry search of Coast 12 and email to Paul Chambers regarding same.				
	K.M. Jackson	Partner	0.30 hrs.	500.00/hr	\$ 150.00
08/13/14	Conference with Kibben Jackson for instructions on file; review file materials provided by same; review Deloitte Listing Agreement and standard from agreement provided by Accurate bailiffs; revise Deloitte Listing Agreement; emails with Vicki Tickle regarding same; emails with Paul Chambers regarding revised Listing Agreement.				
	Danielle R. Toigo	Associate	1.90 hrs.	330.00/hr	\$ 627.00
08/13/14	Emails exchanged with Paul Chambers, Vicki Tickle and Danielle Toigo regarding review of listing agreement; emails exchanged with Paul Chambers regarding advising counsel for Imperial Paving with respect to listing of vessel.				
	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
08/13/14	Reviewing and revising draft listing agreement; emails with Danielle Toigo and Paul Chambers regarding same.				
	Vicki Tickle	Associate	0.60 hrs.	420.00/hr	\$ 252.00
08/18/14	Email from Paul Chambers regarding listing of Malaspina Straits; email to counsel for Imperial Paving to advise as to same.				
	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
08/19/14	Review draft purchase and sale agreement for Katzie Pride forwarded by Paul Chambers; emails exchanged with Paul Chambers regarding same; draft amended purchase and sale agreement and forward to Paul Chambers with comments.				
	K.M. Jackson	Partner	2.20 hrs.	500.00/hr	\$ 1,100.00
08/20/14	Numerous emails exchanged with Paul Chambers regarding amendments to draft Purchase and Sale Agreement for Katzie Pride; draft amendments to same and email clean and comparison versions to Paul Chambers; draft precedent purchase and sale agreement for future sales of assets under \$250,000; email same to Paul Chambers with comments.				
	K.M. Jackson	Partner	3.50 hrs.	500.00/hr	\$ 1,750.00
08/21/14	Emails exchanged with Paul Chambers regarding delivery of deposit.				
	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

08/22/14    Email from Paul Chambers attaching sale agreements for CFW Vagg Katzie Pride;  
 email to Paul Chambers regarding payment of deposit and completion of same.  
 K.M. Jackson    Partner    0.20 hrs.    500.00/hr    \$ 100.00

**Professional Summary**

<u>Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
K.M. Jackson	Partner	500.00	10.50	5,250.00
Vicki Tickle	Associate	420.00	0.60	252.00
Danielle R. Toigo	Associate	330.00	1.90	627.00
		<b>Total</b>	<b>13.00</b>	<b>CAD \$ 6,129.00</b>



**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

<b>Our Fees</b>	<b>\$ 6,129.00</b>
GST	306.45
BCPST	429.03
<b>Total Fees Including Taxes</b>	<b>\$ 6,864.48</b>

**Disbursements**

Non-Taxable

08/05/14	Registration/Court Fees /DYE DURHAM/6130915/MISCELLANEOUS	20.00
08/13/14	Registration/Court Fees /DYE DURHAM/6135875/MISCELLANEOUS	180.00
08/20/14	BC Online Searches/Queries	14.00

Taxable

08/01/14	Lasercopy	1.60
08/05/14	Title Searches/Court filings/Cert. Copies /DYE	48.00
08/07/14	Lasercopy	11.20
08/12/14	Lasercopy	0.80
08/13/14	Lasercopy	18.00
08/13/14	Lasercopy	12.80
08/13/14	Title Searches/Court filings/Cert. Copies /DYE	52.90
08/14/14	Lasercopy	0.40
08/20/14	BC Online Searches/Queries	3.00
08/25/14	Lasercopy	1.20
08/25/14	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	0.40
08/29/14	Trust Administration Fee (BC)	15.00

<b>Total Disbursements</b>	<b>379.30</b>
GST	8.27
<b>Total Disbursements Including Taxes</b>	<b>387.57</b>

**Total Fees, Disbursements and Taxes** **CAD \$ 7,252.05**

**Tax Summary**

GST	314.72
BCPST	429.03

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

Page 6  
Invoice #: 844753

Total Taxes Included in This Bill

---

743.75

---

This is Exhibit C referred to in the  
affidavit of Kibben Jackson  
made before me on this 22  
day of October 20 15  
ATI  
A Commissioner for taking  
Affidavits for British Columbia

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile



Deloitte & Touche LLP  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

October 16, 2014  
Invoice #: 854919  
GST #: 87937 6127 RT0003

Attention: Huey Lee

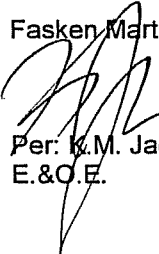
---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**

**For Professional Services rendered through September 30, 2014 as described in the attached memorandum**

Total Fees	\$ 18,393.00
Total Disbursements	291.40
Total Taxes	2,217.73
<b>Total Amount Owing This Bill</b>	<b><u>CAD \$ 20,902.13</u></b>

Fasken Martineau DuMoulin LLP

  
Per: K.M. Jackson  
E.&O.E.

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

Vancouver    Calgary    Toronto    Ottawa    Montréal    Québec City    London    Paris    Johannesburg

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents



2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**Deloitte & Touche LLP**  
**2800 - 1055 Dunsmuir Street**  
**PO Box 49279**  
**Vancouver, BC V7X 1P4**

October 16, 2014  
Invoice #: 854919  
GST #: 87937 6127 RT0003

Attention: Huey Lee

### FEE MEMORANDUM

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

09/03/2014	Telephone conversation with Paul Chambers regarding issues with respect to insurer and removal of barge; emails exchanged with Michael Parrish regarding same.	K.M. Jackson	Partner	0.40 hrs.	500.00/hr	\$ 200.00
09/04/2014	Telephone conversation with Michael Parrish regarding insurance claim and issues with respect to denial of coverage and preservation of barge; email to Paul Chambers and Michael Parrish regarding same.	K.M. Jackson	Partner	0.90 hrs.	500.00/hr	\$ 450.00
09/05/2014	Emails exchanged with Paul Chambers regarding review of insurance materials; telephone conversation with Huey Lee regarding insurance claim.	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
09/05/2014	Review and respond to e-mails regarding insurance and marine issues; consider and advise upon insurance and marine issues; draft preliminary action item plan.	M.D. Parrish	Partner	1.00 hrs.	440.00/hr	\$ 440.00
09/08/2014	Emails exchanged with Paul Chambers and Huey Lee regarding denial of coverage by insurer and review of same by Faskens; emails exchanged with Paul Chambers and Vicki Tickle regarding preparation of materials for application for approval of sale of Katzie Pride.	K.M. Jackson	Partner	0.40 hrs.	500.00/hr	\$ 200.00
09/08/2014	Review and respond to e-mails regarding denial of coverage; consider coverage issues.	M.D. Parrish	Partner	0.60 hrs.	440.00/hr	\$ 264.00
09/08/2014	Emails with Kibben Jackson and Paul Chambers regarding application for approval of sale of Katzie Pride vessel.					

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

	Vicki Tickle	Associate	0.20 hrs.	420.00/hr	\$ 84.00
09/09/2014	Reviewing receivership materials and agreement for purchase and sale of 'Katzie Pride'; drafting notice of application for approval and vesting order.				
	Vicki Tickle	Associate	1.50 hrs.	420.00/hr	\$ 630.00
09/10/2014	Discussion with Danielle Toigo regarding application for approval and vesting order, and draft materials with respect to same; organizing materials;				
	Vicki Tickle	Associate	0.40 hrs.	420.00/hr	\$ 168.00
09/11/2014	Review and reply to update and status e-mail from Mr. Chambers; review documents regarding insurance claim and loss.				
	M.D. Parrish	Partner	0.70 hrs.	440.00/hr	\$ 308.00
09/12/2014	Review and reply to e-mails from Mr. Chambers; review insurance denial; review policy and related documents.				
	M.D. Parrish	Partner	0.50 hrs.	440.00/hr	\$ 220.00
09/15/2014	Review letter from adjuster and surveyor's report denying claim in respect of barge; email from Huey Lee forwarding communications with bank and counsel for bank regarding same.				
	K.M. Jackson	Partner	0.50 hrs.	500.00/hr	\$ 250.00
09/15/2014	Review and respond to e-mails regarding claim denial; review and consider denial; review Maritime Insurance Act; review and respond to e-mails from Graham Walker at BLG.				
	M.D. Parrish	Partner	0.50 hrs.	440.00/hr	\$ 220.00
09/16/2014	Telephone conversations with Allison Burton and Huey Lee regarding completion of report and timing for service of materials in support of application for approval of sale of Katzie Pride; telephone conversation with Michael Parrish regarding review of denial letter and surveyor report as well as conversation with counsel for Bank of Montreal regarding same.				
	K.M. Jackson	Partner	0.40 hrs.	500.00/hr	\$ 200.00
09/16/2014	Review documents and file; review numerous expert survey reports; consider and analyze technical causation issues.				
	M.D. Parrish	Partner	4.50 hrs.	440.00/hr	\$ 1,980.00
09/17/2014	Conference with Michael Parrish regarding initial review of insurance claim, survey and denial letter from adjustor.				
	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

09/17/2014	Continue reviewing documents and expert reports; telephone conference with Graham Walker of BLG regarding background and history of events; review case law regarding various issues of maritime insurance; draft list of outstanding documents; review and respond to e-mails regarding status and strategy; prepare for meeting with Deloitte.	M.D. Parrish	Partner	2.50 hrs.	440.00/hr	\$ 1,100.00
09/18/2014	Emails with Mr. Jackson regarding application shells.	Danielle R. Toigo	Associate	0.10 hrs.	330.00/hr	\$ 33.00
09/18/2014	Attend at conference with Michael Parrish, Huey Lee and Paul Chambers to discuss Katzie Pride insurance claim and strategy with respect to same.	K.M. Jackson	Partner	0.90 hrs.	500.00/hr	\$ 450.00
09/18/2014	Prepare for and attend at meeting with Huey Lee and Paul Chambers; consider and advise upon issue regarding denial of coverage; send and respond to numerous e-mails regarding retainer of surveyors; review and respond to e-mails regarding coverage issues; review law regarding maritime insurance policies.	M.D. Parrish	Partner	3.00 hrs.	440.00/hr	\$ 1,320.00
09/19/2014	Review and draft amendments to Receiver's first report; email same to Paul Chambers, Huey Lee and Michael Parrish with comments; review emails from Michael Parrish concerning Miller 309 insurance claim.	K.M. Jackson	Partner	2.80 hrs.	500.00/hr	\$ 1,400.00
09/19/2014	Review and respond to e-mails from surveyors; e-mail to Deloitte regarding survey issues; review and revise report to Deloitte; continue analyzing coverage issues and policy.	M.D. Parrish	Partner	2.00 hrs.	440.00/hr	\$ 880.00
09/21/2014	Draft Notice of Application and Vesting Order in respect of sale of Katzie Pride and approval of Receiver's activities; emails exchanged with Huey Lee, Paul Chambers and Alison Burton in respect of same and draft Receiver's first report.	K.M. Jackson	Partner	3.40 hrs.	500.00/hr	\$ 1,700.00
09/22/2014	Review Deloitte's comments on notice of application and revise and finalize same; revise and finalize draft order; emails with Kibben Jackson regarding same; instructions to Lisa Lewis regarding filing and serving same.	Danielle R. Toigo	Associate	0.80 hrs.	330.00/hr	\$ 264.00
09/22/2014	Review and respond to e-mails regarding status; continue analyzing coverage issues; telephone conference with surveyor regarding scope of advice and quote.	M.D. Parrish	Partner	0.50 hrs.	440.00/hr	\$ 220.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

09/23/2014	Receive instructions from Kibben Jackson regarding BIA and BC Civil Rules of Court priorities; research same; draft email to Kibben Jackson regarding same.	Fergus J.L. McDonnell	Student	0.80 hrs.	230.00/hr	\$ 184.00
09/23/2014	Numerous emails exchanged with counsel for Katzie First Nations and Gord Kleaman regarding timing for application and issues with respect to same; emails exchanged with Paul Chambers and Huey Lee regarding same; telephone conversation and emails exchanged with Magnus Verbrugge regarding same.	K.M. Jackson	Partner	0.90 hrs.	500.00/hr	\$ 450.00
09/23/2014	Review and respond to e-mails from Graham Walker regarding coverage issues; consider policy and formulate coverage theory; review evidence to support coverage theory.	M.D. Parrish	Partner	0.50 hrs.	440.00/hr	\$ 220.00
09/24/2014	Numerous emails exchanged with counsel for Kleaman and for Katzie First Nation regarding timing of application and issues concerning same, including sale price of vessel; emails exchanged and conferences with Huey Lee and Paul Chambers regarding same, including with respect to history of vessel and basis for reduced sale price; emails exchanged and telephone conversation with counsel for Gisbourne regarding extending dates under purchase and sale agreement; instructions to Laura Smith to draft Amending Agreement; review and draft amendments to same and send same to Huey Lee and Paul Chambers for review and comments.	K.M. Jackson	Partner	2.30 hrs.	500.00/hr	\$ 1,150.00
09/24/2014	Draft amendment agreement to purchase and sale agreement.	Laura J. Smith	Associate	1.20 hrs.	270.00/hr	\$ 324.00
09/24/2014	Continue researching and considering numerous legal and factual issues; analyze Policy and Marine Insurance Act to formulate theory of coverage; telephone conference with Graham Walker (BMO counsel) regarding coverage issues; report to Deloitte; review and reply to e-mails regarding coverage issues.	M.D. Parrish	Partner	2.30 hrs.	440.00/hr	\$ 1,012.00
09/25/2014	Emails from Paul Chambers and Huey Lee regarding draft amending agreement; draft amendments to same and forward same to Counsel for Purchaser for execution; emails exchanged with Counsel for Katzie First Nation and Kleaman regarding adjournment of application.	K.M. Jackson	Partner	0.30 hrs.	500.00/hr	\$ 150.00



**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

09/26/2014	Numerous emails exchanged with Paul Chambers and Huey Lee regarding explanation for lower sale price of Katzie Pride and costs to repair; email to counsel Katzie First Nation and Mr. Kleaman regarding same; emails exchanged with counsel for Gisbourne Marine to exchange endorsed copies of Amending Agreement; emails exchanged with counsel for Katzie First Nation regarding adjournment and conditions of same.	K.M. Jackson	Partner	1.30 hrs.	500.00/hr	\$ 650.00
09/26/2014	Review and respond to e-mails regarding strategy and action items.	M.D. Parrish	Partner	0.20 hrs.	440.00/hr	\$ 88.00
09/27/2014	Draft affidavit of Paul Chambers attaching an amending agreement; emails exchanged with Paul Chambers and Huey Lee regarding same and finalization of same as well as timing for delivery of additional materials.	K.M. Jackson	Partner	0.60 hrs.	500.00/hr	\$ 300.00
09/29/2014	Email from counsel for Kleaman advising that they will not oppose application; emails exchanged with client regarding same.	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
09/29/2014	Review and respond to e-mails from surveyors regarding issues.	M.D. Parrish	Partner	0.10 hrs.	440.00/hr	\$ 44.00
09/30/2014	Email from counsel for Kleaman attaching Application Response; email same to client.	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
09/30/2014	Telephone conference with David Trickett regarding repair and valuation issues and questions; review and respond to e-mails from Deloitte regarding repair and valuation.	M.D. Parrish	Partner	1.00 hrs.	440.00/hr	\$ 440.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

**Professional Summary**

<u>Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
K.M. Jackson	Partner	500.00	15.90	7,950.00
M.D. Parrish	Partner	440.00	19.90	8,756.00
Vicki Tickle	Associate	420.00	2.10	882.00
Danielle R. Toigo	Associate	330.00	0.90	297.00
Laura J. Smith	Associate	270.00	1.20	324.00
Fergus J.L. McDonnell	Student	230.00	0.80	184.00
	<b>Total</b>		<b>40.80</b>	<b>CAD \$ 18,393.00</b>

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

<b>Our Fees</b>	<b>\$ 18,393.00</b>
GST	919.65
BCPST	1,287.51
	<hr/>
Total Fees Including Taxes	<u>\$ 20,600.16</u>

**Disbursements**

Non-Taxable

09/22/14	Registration/Court Fees /DYE DURHAM/6157682/COURT SERVICES	80.00
----------	--	-------

Taxable

09/09/14	Lasercopy	9.60
09/09/14	Lasercopy	2.00
09/22/14	Lasercopy	10.00
09/22/14	Lasercopy	13.60
09/22/14	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	71.60
09/22/14	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	15.20
09/22/14	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	6.00
09/22/14	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	15.20
09/22/14	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	6.00
09/22/14	Title Searches/Court filings/Cert. Copies /DYE	28.85
09/22/14	Lasercopy	0.80
09/23/14	Lasercopy	7.60
09/24/14	Title Searches/Court filings/Cert. Copies /DYE	14.95
09/25/14	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	0.80
09/25/14	Lasercopy	1.60
09/26/14	Lasercopy	1.60
09/27/14	Lasercopy	0.80
09/27/14	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	1.60
09/27/14	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	2.40
09/30/14	Lasercopy	1.20

Matter Number: 242587.00098  
Matter: Katzie Group of Companies  
Responsible Professional: K.M. Jackson

Total Disbursements	291.40	
GST	10.57	
Total Disbursements Including Taxes		301.97
<b>Total Fees, Disbursements and Taxes</b>		<b><u>CAD \$ 20,902.13</u></b>

**Tax Summary**

GST	930.22	
BCPST	1,287.51	
Total Taxes Included in This Bill	2,217.73	

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile



**Deloitte & Touche LLP**  
**2800 - 1055 Dunsmuir Street**  
**PO Box 49279**  
**Vancouver, BC V7X 1P4**

October 16, 2014  
Invoice #: 854919  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**REMITTANCE COPY**  
**Please return with your payment**

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

**For Professional Services rendered through September 30, 2014 as described in the attached memorandum**

Total Fees	\$ 18,393.00
Total Disbursements	291.40
Total Taxes	2,217.73
<b>Total Amount Owing This Bill</b>	<b><u>CAD \$ 20,902.13</u></b>

**Tax Summary**

GST	930.22
BCPST	1,287.51
<b>Total Taxes Included in This Bill</b>	<b><u>2,217.73</u></b>

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

Vancouver    Calgary    Toronto    Ottawa    Montréal    Québec City    London    Paris    Johannesburg

This is Exhibit D referred to in the  
affidavit of Kibben Jackson  
made before me on this 22  
day of October 20 15

D.J.  
A Commissioner for taking  
Affidavits for British Columbia

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**FASKEN  
MARTINEAU** 

**Deloitte & Touche LLP**  
**2800 - 1055 Dunsmuir Street**  
**PO Box 49279**  
**Vancouver, BC V7X 1P4**

November 19, 2014  
Invoice #: 864078  
GST #: 87937 6127 RT0003

Attention: Huey Lee


---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**

**For Professional Services rendered through October 31, 2014 as described in the attached memorandum**

Total Fees	\$ 15,529.00
Total Disbursements	524.82
Total Taxes	1,889.72
<b>Total Amount Owing This Bill</b>	<b><u>CAD \$ 17,943.54</u></b>

Fasken Martineau DuMoulin LLP

  
Per: K.M. Jackson  
E.&O.E.

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

Vancouver    Calgary    Toronto    Ottawa    Montréal    Québec City    London    Paris    Johannesburg

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile



Deloitte & Touche LLP  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

November 19, 2014  
Invoice #: 864078  
GST #: 87937 6127 RT0003

Attention: Huey Lee

### FEE MEMORANDUM

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

10/01/2014	Email from counsel for Katzie First Nations attaching response to application; forward same to client; instructions to Lisa Lewis regarding filing application record.	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
10/02/2014	Emails exchanged with counsel for Katzie First Nation and Michael Parrish regarding attendance at application for approval of sale and denial of insurance claim.	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
10/02/2014	Review and respond to e-mails regarding instructions and preliminary advice from surveyor; prepare for telephone conference with counsel for Katzie (interested party) regarding insurance claim; continue researching insurance issues and developing insurance claim.	M.D. Parrish	Partner	0.50 hrs.	440.00/hr	\$ 220.00
10/03/2014	Attend Supreme Court and stand in for Kibben Jackson; prepare Receiver's Certificate; review documentation for vessel sale and mortgage discharge.	Fergus J.L. McDonnell	Student	2.80 hrs.	230.00/hr	\$ 644.00
10/03/2014	Review correspondence; prepare Bill of Sale; review Court documents and executed Purchase Agreement; intra-office conference with Kibben Jackson and Fergus McDonnell.	Jonathan W. Conlin	Associate	1.00 hrs.	290.00/hr	\$ 290.00
10/03/2014	Prepare for and attend at chambers on application for order approving sale of Katzie Pride and related assets; emails exchanged with Huey Lee and Paul Chambers regarding result of same and closing; instructions to and numerous conferences with Jon Conlin and Ferg McDonnell regarding closing and documents to be delivered in connection with same; emails exchanged with counsel for purchaser regarding closing and documents to be exchanged; conference call with					



Matter Number: 242587.00098  
Matter: Katzie Group of Companies  
Responsible Professional: K.M. Jackson

	Michael Parrish and Gord Plottel to discuss status of insurance claim.				
	K.M. Jackson	Partner	2.00 hrs.	500.00/hr	\$ 1,000.00
10/03/2014	Prepare for and attend telephone conference with Gordon Plottel (counsel for Katzie) regarding insurance claim; e-mail to surveyor regarding status of review and advice.				
	M.D. Parrish	Partner	1.00 hrs.	440.00/hr	\$ 440.00
10/05/2014	Emails with Magnus Verbrugge regarding BMO mortgage.				
	Jonathan W. Conlin	Associate	0.10 hrs.	290.00/hr	\$ 29.00
10/05/2014	Emails exchanged with Jon Conlin and Ferg McDonnell regarding closing and documents to be delivered; review email from Jon Conlin to Magnus Verbrugge regarding same.				
	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
10/06/2014	Prepare documents for sale of Katzie Pride.				
	Fergus J.L. McDonnell	Student	1.80 hrs.	230.00/hr	\$ 414.00
10/06/2014	Attend to all Closing matters.				
	Jonathan W. Conlin	Associate	1.50 hrs.	290.00/hr	\$ 435.00
10/06/2014	Numerous emails exchanged with and from Jon Conlin and Ferg McDonnell regarding closing of sale of Katzie Pride and issues pertaining to same; emails exchanged with Huey Lee, Paul Chambers and Michael Parrish regarding meeting with bank to discuss status of receivership, including insurance claim.				
	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
10/06/2014	Review and respond to e-mails regarding survey issues and investigation; e-mail surveyor regarding additional advice.				
	M.D. Parrish	Partner	0.20 hrs.	440.00/hr	\$ 88.00
10/07/2014	Update documents for sale of Katzie Pride.				
	Fergus J.L. McDonnell	Student	0.30 hrs.	230.00/hr	\$ 69.00
10/07/2014	Closing.				
	Jonathan W. Conlin	Associate	1.10 hrs.	290.00/hr	\$ 319.00
10/07/2014	Review emails from Jon Conlin, counsel for Gisbourne and client regarding closing of sale of Katzie Pride; emails exchanged with client and Michael Parrish regarding				

Matter Number: 242587.00098  
Matter: Katzie Group of Companies  
Responsible Professional: K.M. Jackson

Page 4  
Invoice #: 864078

	meeting to discuss insurance claim and other matters.				
	K.M. Jackson Partner	0.20 hrs.	500.00/hr	\$ 100.00	
10/07/2014	Review and respond to e-mails regarding status; telephone conference with David Trickett regarding various damages and valuation issues; continue researching and analyzing issues; telephone conference with Paul Chambers regarding analysis and advice; draft overall claim analysis.				
	M.D. Parrish Partner	1.50 hrs.	440.00/hr	\$ 660.00	
10/08/2014	Review draft reporting email from Michael Parrish to client regarding insurance claim and issues with respect to same, as well as strategy recommendation; emails exchanged with Michael Parrish regarding amendments to same.				
	K.M. Jackson Partner	0.30 hrs.	500.00/hr	\$ 150.00	
10/08/2014	Review case law and legislation; conduct overall case analysis; telephone conference with David Trickett regarding advice and surveys; review and analyze surveys and documents; draft e-mail report and analysis; revise report and analysis.				
	M.D. Parrish Partner	3.50 hrs.	440.00/hr	\$ 1,540.00	
10/09/2014	Prepare for and attend on teleconference with Michael Parrish, Huey Lee and Paul Chambers to discuss memo regarding insurance claim and issues pertaining to same.				
	K.M. Jackson Partner	0.30 hrs.	500.00/hr	\$ 150.00	
10/09/2014	Review and respond to e-mails from surveyor regarding advice and issues; review further surveys; e-mail report to Deloitte; prepare for telephone conference with Deloitte; draft and revise final report for Deloitte.				
	M.D. Parrish Partner	3.10 hrs.	440.00/hr	\$ 1,364.00	
10/10/2014	Review draft memorandum regarding insurance claim prepared by Michael Parrish; draft amendments to same and email to Michael Parrish, Huey Lee and Paul Chambers with comments on same.				
	K.M. Jackson Partner	0.50 hrs.	500.00/hr	\$ 250.00	
10/10/2014	Continue drafting and revising reporting letter to Deloitte; consider and investigate cost and legal strategy issues.				
	M.D. Parrish Partner	1.40 hrs.	440.00/hr	\$ 616.00	
10/14/2014	Prepare for and attend at meeting with Huey Lee, Paul Chambers, Wellie Tjoe and Larry Chipman to discuss status of receivership, issues with respect to insurance claim and other matters relating to receivership generally; emails exchanged and telephone conversation with Michael Parrish regarding insurance claim and other options for recovery with respect to Miller 309.				

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

Page 5  
 Invoice #: 864078

Date	Description	Professional	Role	Hours	Rate	Amount
		K.M. Jackson	Partner	1.30 hrs.	500.00/hr	\$ 650.00
10/14/2014	Review and respond to e-mails regarding report, advice and instructions; revise report to Deloitte; consider further issues and questions regarding insurance claim and valuation; review case law regarding negligent valuation and advice; draft preliminary advice to Deloitte.	M.D. Parrish	Partner	1.00 hrs.	440.00/hr	\$ 440.00
10/15/2014	Email from Paul Chambers regarding Sales Invoices.	Jonathan W. Conlin	Associate	0.10 hrs.	290.00/hr	\$ 29.00
10/15/2014	Review email from Michael Parrish regarding cost of advancing alternative claim under insurance and potential negligent valuation claim; email to Michael Parrish regarding same; telephone conversation and emails exchanged with Michael Parrish regarding additional facts relating to negligent valuation claim; review and suggest amendments to draft email to client regarding negligent valuation claim.	K.M. Jackson	Partner	0.70 hrs.	500.00/hr	\$ 350.00
10/15/2014	Continue researching and analyzing insurance claim issues, valuation issues and potential claim against valuator; draft reporting e-mail to Deloitte; review and reply to numerous e-mails regarding status and action items.	M.D. Parrish	Partner	3.00 hrs.	440.00/hr	\$ 1,320.00
10/16/2014	Telephone conference with previous surveyor regarding 2008 survey; continue fact and document investigation.	M.D. Parrish	Partner	0.30 hrs.	440.00/hr	\$ 132.00
10/17/2014	Emails exchanged with Huey Lee regarding communications with counsel for Katzie Band regarding insurance claim and possible claim against surveyor.	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
10/19/2014	Review TCB Marine survey; report to Deloitte regarding TCB Marine survey; review and respond to e-mails regarding insurance claim and action items.	M.D. Parrish	Partner	0.40 hrs.	440.00/hr	\$ 176.00
10/20/2014	Review email from Michael Parrish attaching survey performed at same time as survey performed by Trickett; emails exchanged with Michael Parrish, Huey Lee and Paul Chambers regarding effect of same; emails exchanged with counsel for Katzie Band, Michael Parrish and client regarding timing for call to discuss insurance claim and other matters; telephone conversation with Magnus Verbrugge regarding insurance claim and potential claim against Trickett.	K.M. Jackson	Partner	0.30 hrs.	500.00/hr	\$ 150.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

10/20/2014	Review and respond to numerous e-mails regarding insurance claim and claim vs. surveyor; telephone call from surveyor regarding 2008 report.	M.D. Parrish	Partner	0.40 hrs.	440.00/hr	\$ 176.00
10/23/2014	Teleconference with trustee, Michael Parrish and counsel for Katzie Band regarding insurance claim, potential claim against surveyor and status of receivership generally; email to counsel for Kleaman requesting meeting to discuss same.	K.M. Jackson	Partner	0.40 hrs.	500.00/hr	\$ 200.00
10/23/2014	Prepare for and attend at conference call with interested parties; review and respond to e-mails regarding status of action items and further investigations.	M.D. Parrish	Partner	0.30 hrs.	440.00/hr	\$ 132.00
10/24/2014	Numerous emails exchanged with counsel for Mr. Kleaman and with client regarding meeting to discuss insurance claim and payment of legal costs of Mr. Kleaman; emails exchanged with Magnus Verbrugge regarding claim of Bank against surveyor.	K.M. Jackson	Partner	0.40 hrs.	500.00/hr	\$ 200.00
10/27/2014	Emails exchanged with Michael Parrish regarding email from counsel for Kleaman requesting written questions; emails exchanged with Huey Lee regarding same.	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
10/27/2014	Review and respond to e-mails regarding interview with Gordon Kleaman; consider strategy.	M.D. Parrish	Partner	0.20 hrs.	440.00/hr	\$ 88.00
10/28/2014	Email to counsel for Katzie Band regarding communications with counsel for Mr. Kleaman and seeking input with respect to same; email to counsel for Bank of Montreal regarding same.	K.M. Jackson	Partner	0.30 hrs.	500.00/hr	\$ 150.00
10/29/2014	Emails exchanged with counsel for Bank regarding communications with counsel for Kleaman.	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
10/30/2014	Numerous emails exchanged with counsel for Katzie Band, counsel for Mr. Kleaman and Michael Parrish regarding additional information of Mr. Kleaman relating to insurance claim and value of Miller 309; conference with Michael Parrish regarding same; emails exchanged with client regarding same.	K.M. Jackson	Partner	0.40 hrs.	500.00/hr	\$ 200.00
10/30/2014	Review and respond to numerous e-mails from Deloitte and opposing counsel					

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

	regarding documents and status of investigations.				
	M.D. Parrish	Partner	1.50 hrs.	440.00/hr	\$ 660.00
10/31/2014	Emails exchanged with Michael Parrish and counsel for Kleaman regarding insurance claim and value of barge; attend on teleconference with Michael Parrish, counsel for Kleaman and Kleaman regarding same.				
	K.M. Jackson	Partner	0.50 hrs.	500.00/hr	\$ 250.00
10/31/2014	Review and respond to numerous e-mails regarding questions to and telephone conference with Gordon Kleaman; telephone conference with Gordon Kleaman and counsel; notes to file regarding facts, legal issues and action items.				
	M.D. Parrish	Partner	1.70 hrs.	440.00/hr	\$ 748.00

**Professional Summary**

<u>Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
K.M. Jackson	Partner	500.00	9.00	4,500.00
M.D. Parrish	Partner	440.00	20.00	8,800.00
Jonathan W. Conlin	Associate	290.00	3.80	1,102.00
Fergus J.L. McDonnell	Student	230.00	4.90	1,127.00
	<b>Total</b>		<b>37.70</b>	<b>CAD \$ 15,529.00</b>

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

<b>Our Fees</b>	<b>\$ 15,529.00</b>
GST	776.45
BCPST	1,087.03
	<hr/>
Total Fees Including Taxes	<b>\$ 17,392.48</b>

**Disbursements**

Taxable

10/01/14	Lasercopy	42.00
10/01/14	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	2.40
10/01/14	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	2.40
10/01/14	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	6.40
10/01/14	Title Searches/Court filings/Cert. Copies /DYE	19.95
10/01/14	Title Searches/Court filings/Cert. Copies /DYE	23.95
10/02/14	Title Searches/Court filings/Cert. Copies /DYE	23.95
10/02/14	Lasercopy	0.80
10/03/14	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	2.40
10/03/14	Lasercopy	4.40
10/03/14	Lasercopy	1.20
10/06/14	Lasercopy	2.80
10/06/14	Title Searches/Court filings/Cert. Copies /DYE	59.85
10/07/14	Lasercopy	3.20
10/07/14	Document Scan /VAN - 1c1s 28rd Floor Xerox 5775	2.40
10/07/14	Document Scan /VAN - 1c1s 28rd Floor Xerox 5775	2.40
10/07/14	Document Scan /VAN - 1c1s 28rd Floor Xerox 5775	5.20
10/07/14	Photocopies /VAN - 1c1s 28rd Floor Xerox 5775	1.20
10/07/14	Photocopies /VAN - 1c1s 28rd Floor Xerox 5775	5.20
10/07/14	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	0.80

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

10/07/14	Delivery/Courier Expense /CORPORATE	23.03	
10/14/14	Lasercopy	14.40	
10/14/14	Document Scan /VAN - 1c1s 26th Floor Xerox 5775	3.20	
10/14/14	Lasercopy	3.20	
10/15/14	Lasercopy	1.60	
10/15/14	Quicklaw Searches QUICKLAW	258.22	
10/15/14	Quicklaw Searches QUICKLAW SERVICE/SINGLE	8.27	
	Total Disbursements	524.82	
	GST	26.24	
	Total Disbursements Including Taxes		551.06
	<b>Total Fees, Disbursements and Taxes</b>		<b><u>CAD \$ 17,943.54</u></b>

**Tax Summary**

GST	802.69
BCPST	1,087.03
Total Taxes Included in This Bill	<u>1,889.72</u>

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents



2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**Deloitte & Touche LLP**  
**2800 - 1055 Dunsmuir Street**  
**PO Box 49279**  
**Vancouver, BC V7X 1P4**

November 19, 2014  
Invoice #: 864078  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**REMITTANCE COPY**  
**Please return with your payment**

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

**For Professional Services rendered through October 31, 2014 as described in the attached memorandum**

Total Fees	\$ 15,529.00
Total Disbursements	524.82
Total Taxes	1,889.72
<b>Total Amount Owing This Bill</b>	<b><u>CAD \$ 17,943.54</u></b>

**Tax Summary**

GST	802.69
BCPST	1,087.03
Total Taxes Included in This Bill	<u>1,889.72</u>

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532



This is Exhibit E referred to in the  
affidavit of Kibben Jackson  
made before me on this 22  
day of October 20 15  
DTL  
A Commissioner for taking  
Affidavits for British Columbia

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents



2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**Deloitte & Touche LLP**  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

December 22, 2014  
Invoice #: 876213  
GST #: 87937 6127 RT0003

Attention: Huey Lee

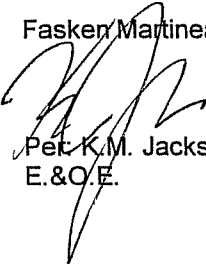
---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**

**For Professional Services rendered through November 30, 2014 as described in the attached memorandum**

Total Fees	\$ 7,582.50
Total Disbursements	97.56
Total Taxes	914.54
<b>Total Amount Owing This Bill</b>	<b>CAD \$ 8,594.60</b>

Fasken Martineau DuMoulin LLP

  
Per: K.M. Jackson  
E.&O.E.

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents



2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

Deloitte & Touche LLP  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

December 22, 2014  
Invoice #: 876213  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**FEE MEMORANDUM**

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

11/03/2014	Conference with Mr. Parrish regarding conversation with Mr. Kleaman and counsel for Mr. Kleaman as well as next steps for addressing issues raised therein; review email from Michael Parrish to client regarding same; emails exchanged with Michael Parrish regarding commencing action against Seaspan in order to preserve claim in light of potential limitation issue.	K.M. Jackson	Partner	0.30 hrs.	500.00/hr	\$ 150.00
11/03/2014	Consider and analyze new fact information from Gordon Kleaman; consider and advise upon next steps; report to Deloitte.	M.D. Parrish	Partner	1.00 hrs.	440.00/hr	\$ 440.00
11/04/2014	Research subrogation and limitation period issues; report to Deloitte regarding preserving claim vs. Seaspan.	M.D. Parrish	Partner	1.20 hrs.	440.00/hr	\$ 528.00
11/07/2014	Review and respond to e-mails regarding barge issues; continue reviewing and researching potential downtime claim under hull policy.	M.D. Parrish	Partner	0.50 hrs.	440.00/hr	\$ 220.00
11/11/2014	Review emails from Paul Chambers regarding concern with respect to security of Miller 309 as well as potential sale of same; telephone conversation with Michael Parrish regarding same and regarding considerations with respect to pursuit of insurance claim and claim against Seaspan; email to Paul Chambers and Huey Lee, copying Michael Parrish, regarding foregoing and setting forth recommendations.	K.M. Jackson	Partner	0.70 hrs.	500.00/hr	\$ 350.00
11/11/2014	Review and respond to e-mails regarding barge issues and strategy; consider and advise upon developments and strategy.	M.D. Parrish	Partner	0.50 hrs.	440.00/hr	\$ 220.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

11/12/2014	Review and respond to e-mails regarding insurance issues and strategy. M.D. Parrish Partner	0.30 hrs.	440.00/hr	\$ 132.00
11/13/2014	Attend on conference call with Huey Lee, Paul Chambers and Michael Parrish to discuss insurance claim and strategy for dealing with Miller 309; emails exchanged with Huey Lee regarding payment of accounts prior to passing same. K.M. Jackson Partner	0.40 hrs.	500.00/hr	\$ 200.00
11/13/2014	Telephone conference with Paul Chambers and Huey Lee; review and reply to e-mails with Ruan Desouza regarding document requests; draft letter to insurer challenging denial. M.D. Parrish Partner	1.00 hrs.	440.00/hr	\$ 440.00
11/14/2014	Review and revise Purchase and Sale Agreement; emails with Kibben Jackson regarding same; emails with Paul Chambers regarding same; revise same based on comments on recirculate draft agreement; emails with Jon Conlin regarding procedure for discharging vessel mortgage. Danielle R. Toigo Associate	2.50 hrs.	330.00/hr	\$ 825.00
11/14/2014	Emails exchanged with and instructions to Danielle Toigo regarding preparation of purchase and sale agreement for Miller 309; review and note amendments to same; emails exchanged with Danielle Toigo, Huey Lee and Paul Chambers regarding final version of purchase and sale agreement and considerations with respect to same. K.M. Jackson Partner	0.50 hrs.	500.00/hr	\$ 250.00
11/17/2014	Review and respond to e-mails regarding surveyor advice and opinion. M.D. Parrish Partner	0.10 hrs.	440.00/hr	\$ 44.00
11/18/2014	Review e-mail from Paul Chambers regarding receiver decision to disclaim interest in barge. Danielle R. Toigo Associate	0.10 hrs.	330.00/hr	\$ 33.00
11/18/2014	Emails exchanged with Paul Chambers regarding intention of receiver to disclaim interest in Miller 309 as well as to prepare interim statement of accounts. K.M. Jackson Partner	0.20 hrs.	500.00/hr	\$ 100.00
11/19/2014	Review Receivership Order to determine scope of powers to disclaim interest in debtor's assets; review annotated BIA with respect to same; conference with Kibben Jackson regarding same; emails to Mr. Jackson and Mr. Grieve regarding same; emails to Paul Chambers regarding same; draft disclaimer letter and send to Mr. Chambers for comment. Danielle R. Toigo Associate	2.10 hrs.	330.00/hr	\$ 693.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

11/19/2014	Emails with Danielle Toigo and Kibben Jackson regarding Miller 309 and disclaimer; review file and study law regarding same; emails with Danielle Toigo regarding factual background and recommendation and duties of the Receiver.	J.F. Grieve	Partner	0.70 hrs.	725.00/hr	\$ 507.50
11/19/2014	Numerous emails exchanged with Danielle Toigo, John Grieve and Paul Chambers regarding disclaimer of interest of receiver in Miller 309; review draft notice of disclaimer prepared by Danielle Toigo and draft amendments to same.	K.M. Jackson	Partner	0.30 hrs.	500.00/hr	\$ 150.00
11/19/2014	Telephone conference with Mr. Trichett regarding expert opinions; review and respond to emails regarding document requests and outstanding issues.	M.D. Parrish	Partner	0.80 hrs.	440.00/hr	\$ 352.00
11/21/2014	Emails exchanged with counsel for Kleaman regarding disclaimer of interest of receiver in Miller 309.	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00
11/21/2014	Research, analyze and draft denial challenge letter.	M.D. Parrish	Partner	3.00 hrs.	440.00/hr	\$ 1,320.00
11/25/2014	Continue researching and drafting insurance claim letter.	M.D. Parrish	Partner	1.20 hrs.	440.00/hr	\$ 528.00

**Professional Summary**

<u>Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
J.F. Grieve	Partner	725.00	0.70	507.50
K.M. Jackson	Partner	500.00	2.60	1,300.00
M.D. Parrish	Partner	440.00	9.60	4,224.00
Danielle R. Toigo	Associate	330.00	4.70	1,551.00
	<b>Total</b>		<b>17.60</b>	<b>CAD \$ 7,582.50</b>

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

Page 5  
 Invoice #: 876213

<b>Our Fees</b>	<b>\$ 7,582.50</b>
GST	379.13
BCPST	530.78
<b>Total Fees Including Taxes</b>	<b>\$ 8,492.41</b>

**Disbursements**

Non-Taxable

11/14/14	Sundry Expense - Payable to: RECEIVER GENERAL OF CANADA / FEE FOR FREEDOM OF INFORMATION REQUEST TO TRANSPORT CANADA/ 13NOV/ SAC/ 19337	5.00
----------	--	------

Taxable

11/13/14	Laser copy	0.40
11/14/14	Laser copy	4.80
11/17/14	Laser copy	12.00
11/17/14	Laser copy	1.60
11/17/14	Photocopies /VAN - 1c1s 26th Floor Xerox 5775	8.80
11/17/14	Document Scan /VAN - 1c1s 26th Floor Xerox 5775	8.80
11/17/14	Postage	1.60
11/18/14	Search Fees - Payable to: AMEX BANK OF CANADA /	31.00
11/19/14	Laser copy	0.40
11/20/14	Laser copy	2.00
11/20/14	Laser copy	2.80
11/21/14	Laser copy	3.60
11/25/14	Laser copy	7.20
11/26/14	Telephone Charges - Payable to: DIALOGUE	7.56

<b>Total Disbursements</b>	<b>97.56</b>
GST	4.63
<b>Total Disbursements Including Taxes</b>	<b>102.19</b>

**Total Fees, Disbursements and Taxes** **CAD \$ 8,594.60**

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

**Tax Summary**

GST	383.76
BCPST	530.78
Total Taxes Included in This Bill	<u>914.54</u>

This is Exhibit F referred to in the  
affidavit of Kibben Jackson  
made before me on this 22  
day of October 20 15  
BTJ  
A Commissioner for taking  
Affidavits for British Columbia



Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile



Deloitte & Touche LLP  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

January 19, 2015  
Invoice #: 881664  
GST #: 87937 6127 RT0003

Attention: Huey Lee

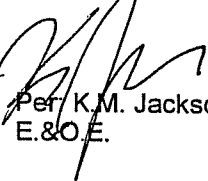
---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**

**For Professional Services rendered through December 31, 2014 as described in the attached memorandum**

Total Fees	\$ 3,663.00
Total Disbursements	8.80
Total Taxes	440.00
<b>Total Amount Owing This Bill</b>	<b>CAD \$ 4,111.80</b>

Fasken Martineau DuMoulin LLP

  
Per K.M. Jackson  
E.&O.E.

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**FASKEN  
MARTINEAU** 

**Deloitte & Touche LLP**  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

January 19, 2015  
Invoice #: 881664  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**FEE MEMORANDUM**

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

12/03/2014	Review and respond to email regarding status; M.D. Parrish Partner	0.10 hrs.	440.00/hr	\$ 44.00
12/05/2014	Emails with Paul Chambers regarding sale of Malaspina Straits. Danielle R. Toigo Associate	0.10 hrs.	330.00/hr	\$ 33.00
12/05/2014	Emails exchanged with Paul Chambers regarding sale of Malaspina Straits and reduced sale price, as well as notification of Imperial Paving and issues pertaining to vesting order; instructions to Danielle Toigo regarding same. K.M. Jackson Partner	0.40 hrs.	500.00/hr	\$ 200.00
12/07/2014	Review offer from General Towing for purchase of Malaspina Straits; review Transport Canada Registry filings for vessel; review and revise draft purchase agreement to account for discharge of mortgages against vessel and send revised draft to Paul Chambers with comment on scheduling application date. Danielle R. Toigo Associate	1.00 hrs.	330.00/hr	\$ 330.00
12/08/2014	Emails with Paul Chambers. Danielle R. Toigo Associate	0.10 hrs.	330.00/hr	\$ 33.00
12/16/2014	Emails with Jon Conlin regarding process for discharging ship mortgages. Danielle R. Toigo Associate	0.10 hrs.	330.00/hr	\$ 33.00
12/23/2014	Emails exchanged with Gary Harlow regarding difficulties effecting transfer of ships due to form of order. K.M. Jackson Partner	0.20 hrs.	500.00/hr	\$ 100.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

12/24/2014	Draft letter to Vessel Registry for Gary Harlow; emails exchanged with Gary Harlow regarding same.	K.M. Jackson	Partner	0.30 hrs.	500.00/hr	\$ 150.00
12/24/2014	Continue researching; analyzing; considering, drafting and revising coverage denial challenge letter.	M.D. Parrish	Partner	2.50 hrs.	440.00/hr	\$ 1,100.00
12/29/2014	Continue drafting, reviewing and finalizing coverage denial challenge letter; continue formulating legal and factual theory.	M.D. Parrish	Partner	3.50 hrs.	440.00/hr	\$ 1,540.00
12/30/2014	Review draft letter and email from Michael Parrish to insurer regarding denial of claim; email to Michael Parrish, Huey Lee and Paul Chambers with comments on same.	K.M. Jackson	Partner	0.20 hrs.	500.00/hr	\$ 100.00

**Professional Summary**

<u>Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
K.M. Jackson	Partner	500.00	1.10	550.00
M.D. Parrish	Partner	440.00	6.10	2,684.00
Danielle R. Toigo	Associate	330.00	1.30	429.00
	<b>Total</b>		<b>8.50</b>	<b>CAD \$ 3,663.00</b>

Matter Number: 242587.00098  
Matter: Katzie Group of Companies  
Responsible Professional: K.M. Jackson

<b>Our Fees</b>		<b>\$ 3,663.00</b>
GST		183.15
BCPST		256.41
<b>Total Fees Including Taxes</b>		<b>\$ 4,102.56</b>
<b>Disbursements</b>		
<u>Taxable</u>		
12/07/14	Lasercopy	8.00
12/24/14	Lasercopy	0.40
12/24/14	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	0.40
<b>Total Disbursements</b>		<b>8.80</b>
GST		0.44
<b>Total Disbursements Including Taxes</b>		<b>9.24</b>
<b>Total Fees, Disbursements and Taxes</b>		<b>CAD \$ 4,111.80</b>

<b>Tax Summary</b>		
GST		183.59
BCPST		256.41
<b>Total Taxes Included in This Bill</b>		<b>440.00</b>

This is Exhibit G referred to in the  
affidavit of Kibben Jackson  
made before me on this 22  
day of October 20 15  
BTJ

A Commissioner for taking  
Affidavits for British Columbia

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents



2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

Deloitte & Touche LLP  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

January 31, 2015  
Invoice #: 891206  
GST #: 87937 6127 RT0003

Attention: Huey Lee

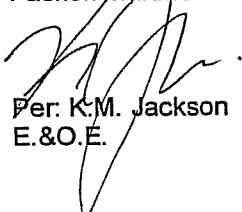
---

Matter Number: 242587.00098  
Matter: Katzie Group of Companies

For Professional Services rendered through January 31, 2015 as described in the attached memorandum

Total Fees	\$ 6,742.50
Total Disbursements	557.05
Total Taxes	830.97
<b>Total Amount Owing This Bill</b>	<b>CAD \$ 8,130.52</b>

Fasken Martineau DuMoulin LLP

  
Per: K.M. Jackson  
E.&O.E.

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile



Deloitte & Touche LLP  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

January 31, 2015  
Invoice #: 891206  
GST #: 87937 6127 RT0003

Attention: Huey Lee

### FEE MEMORANDUM

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

01/02/2015	Emails exchanged with Michael Parrish and Paul Chambers regarding delivery of letter in draft to counsel for Kleaman and counsel for BMO.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
01/02/2015	Review and respond to numerous emails regarding challenge letter; revise challenge letter; review email from Mr. Tweedale; draft email to Mr. Walker;	M.D. Parrish	Partner	0.80 hrs.	450.00/hr	\$ 360.00
01/07/2015	Review and respond to emails from Mr. Kleanon's and Bank of Montreal's counsel regarding challenge letter; revise challenge letter.	M.D. Parrish	Partner	0.40 hrs.	450.00/hr	\$ 180.00
01/08/2015	Emails with Paul Chambers regarding purchase of Katzie Pride and application for approval of same.	Danielle R. Toigo	Associate	0.20 hrs.	360.00/hr	\$ 72.00
01/08/2015	Review and respond to emails regarding proposed letter to Insurer; telephone conference with Mr. Walker regarding letter to Insurer; report to Deloitte regarding letter to Insurer; finalize and send letter to Insurer.	M.D. Parrish	Partner	1.30 hrs.	450.00/hr	\$ 585.00
01/09/2015	Review and respond to emails regarding status and action items.	M.D. Parrish	Partner	0.20 hrs.	450.00/hr	\$ 90.00
01/10/2015	Commence drafting notice of application and draft Order for application of approval of sale of Malaspina Straits.	Danielle R. Toigo	Associate	0.50 hrs.	360.00/hr	\$ 180.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

Page 3  
 Invoice #: 891206

01/12/2015	Commence reviewing and revising Receiver's Second Report; emails with Paul Chambers regarding same.	Danielle R. Toigo	Associate	1.10 hrs.	360.00/hr	\$ 396.00
01/12/2015	Review and respond to numerous emails regarding action items and strategy going forward.	M.D. Parrish	Partner	0.30 hrs.	450.00/hr	\$ 135.00
01/13/2015	Continue reviewing and revising Receiver's Second Report; emails with Kibben Jackson regarding same; emails with Paul Chambers regarding same; review comments made by Michael Parrish; continue drafting and revising notice of application of Vesting Order and draft Order for same; send to client for comment.	Danielle R. Toigo	Associate	2.70 hrs.	360.00/hr	\$ 972.00
01/13/2015	Conference with Michael Parrish regarding language to be included in report regarding abandonment; review amended draft report prepared by Danielle Toigo and email to Danielle Toigo with comments on same; review numerous emails regarding report and timing for application.	K.M. Jackson	Partner	0.50 hrs.	525.00/hr	\$ 262.50
01/13/2015	Review and revise court report; consider and analyze ramifications of disclaimer of interest.	M.D. Parrish	Partner	0.40 hrs.	450.00/hr	\$ 180.00
01/14/2015	Revise and finalize application materials for approval of sale of Malaspina Straits; instruct on filing and service of same; emails with Paul Chambers regarding same.	Danielle R. Toigo	Associate	0.70 hrs.	360.00/hr	\$ 252.00
01/14/2015	Emails exchanged with Danielle Toigo and Paul Chambers regarding delivery of materials to Jordan Kinghorn; review final materials in support of application for approval of sale.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
01/15/2015	Numerous emails with Paul Chambers regarding delivery of redacted Harlow appraisal and engineering report to Jordan Kinghorn; emails to Mr. Kinghorn regarding same.	Danielle R. Toigo	Associate	1.00 hrs.	360.00/hr	\$ 360.00
01/15/2015	Telephone conversation with Jordan Kinghorn regarding delivery of appraisal and inspection report; emails exchanged with Danielle Toigo regarding same.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00



**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

Page 4  
 Invoice #: 891206

01/15/2015	Review and respond to emails from surveyor Trickett regarding comments on letter and facts.	M.D. Parrish	Partner	0.20 hrs.	450.00/hr	\$ 90.00
01/20/2015	Email to Paul Chambers; emails with Jordan Kinghorn; emails with counsel for purchaser of Malaspina Straits.	Danielle R. Toigo	Associate	0.20 hrs.	360.00/hr	\$ 72.00
01/21/2015	Emails with Jordan Kinghorn.	Danielle R. Toigo	Associate	0.10 hrs.	360.00/hr	\$ 36.00
01/22/2015	Telephone call with Jordan Kinghorn; emails with Gordon Plottel.	Danielle R. Toigo	Associate	0.20 hrs.	360.00/hr	\$ 72.00
01/23/2015	Emails with Ms. Giles regarding delivery of materials at closing; emails with Mr. Chambers regarding same; emails with Jon Conlin regarding timeline for discharge of maritime liens.	Danielle R. Toigo	Associate	0.40 hrs.	360.00/hr	\$ 144.00
01/26/2015	Telephone call and emails with counsel for purchaser regarding deliverables at closing and draft vesting order; telephone call with Paul Chambers regarding same; review application response of Imperial Towing; send index to application record to Gordon Plottel.	Danielle R. Toigo	Associate	1.60 hrs.	360.00/hr	\$ 576.00
01/27/2015	Emails with Magnus Verbrugge and BMO regarding position on sale application.	Danielle R. Toigo	Associate	0.30 hrs.	360.00/hr	\$ 108.00
01/27/2015	Review and respond to emails from Captain DeSouza regarding status of claim and response.	M.D. Parrish	Partner	0.10 hrs.	450.00/hr	\$ 45.00
01/28/2015	Prepare for and attend at application for Vesting Order; attend to entry and certification of same; emails to Paul Chambers regarding same and materials needed to close sale; emails with purchaser's counsel regarding same; review letter from purchaser's counsel; respond to same by email; request copy of certified Receivership Order; emails with mortgagees counsel regarding discharge of their mortgages from title to Malaspina Straits.	Danielle R. Toigo	Associate	3.50 hrs.	360.00/hr	\$ 1,260.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

Page 5  
Invoice #: 891206

**Professional Summary**

<u>Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
K.M. Jackson	Partner	525.00	1.10	577.50
M.D. Parrish	Partner	450.00	3.70	1,665.00
Danielle R. Toigo	Associate	360.00	12.50	4,500.00
	<b>Total</b>		<b>17.30</b>	<b>CAD \$ 6,742.50</b>

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

Page 6  
 Invoice #: 891206

<b>Our Fees</b>	<b>\$ 6,742.50</b>
GST	337.13
BCPST	471.98
<b>Total Fees Including Taxes</b>	<b>\$ 7,551.61</b>

**Disbursements**

Non-Taxable

01/14/15	Registration/Court Fees /DYE DURHAM/6220742/COURT SERVICES	80.00
01/30/15	Filing Service/ Court Fees - Payable to: CASH / OBTAINING CERTIFIED COPY OF ORDER AT COURT REGISTRY/ 28JAN/ DRT/ 17807	40.00

Taxable

01/08/15	Lasercopy	7.20
01/08/15	Document Scan /VAN - 1c1s 26th Floor Xerox 5775	7.20
01/10/15	Lasercopy	2.80
01/13/15	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	0.80
01/13/15	Lasercopy	2.00
01/13/15	Lasercopy	26.80
01/13/15	Lasercopy	1.20
01/14/15	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	5.60
01/14/15	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	15.60
01/14/15	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	48.00
01/14/15	Lasercopy	12.80
01/14/15	Title Searches/Court filings/Cert. Copies /DYE	19.95
01/16/15	Lasercopy	1.20
01/19/15	Lasercopy	0.40
01/22/15	Lasercopy	2.00
01/26/15	Lasercopy	3.60
01/26/15	Lasercopy	1.20
01/26/15	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	12.40
01/26/15	Photocopies /VAN - 1c1s 27th Floor	62.80

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

Page 7  
 Invoice #: 891206

	Xerox 5775	
01/26/15	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	5.60
01/26/15	Telephones Charges /12502877755/Campbell River	1.80
01/26/15	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	6.00
01/26/15	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	13.60
01/26/15	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	0.80
01/26/15	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	1.20
01/27/15	Lasercopy	13.60
01/27/15	Title Searches/Court filings/Cert. Copies /DYE	14.95
01/28/15	Lasercopy	20.80
01/28/15	Lasercopy	10.80
01/28/15	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	2.40
01/29/15	Lasercopy	4.00
01/29/15	Title Searches/Court filings/Cert. Copies /DYE	83.95
01/30/15	Lasercopy	10.00
01/30/15	Lasercopy	3.20
01/30/15	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	10.80
	<b>Total Disbursements</b>	<b>557.05</b>
	<b>GST</b>	<b>21.86</b>
	<b>Total Disbursements Including Taxes</b>	<b>578.91</b>
	<b>Total Fees, Disbursements and Taxes</b>	<b>CAD \$ 8,130.52</b>

**Tax Summary**

GST	358.99
BCPST	471.98
<b>Total Taxes Included in This Bill</b>	<b>830.97</b>

This is Exhibit H referred to in the  
affidavit of Kibben Jackson  
made before me on this 22  
day of October 2015  
BTC  
A Commissioner for taking  
Affidavits for British Columbia

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents



2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**Deloitte & Touche LLP**  
**2800 - 1055 Dunsmuir Street**  
**PO Box 49279**  
**Vancouver, BC V7X 1P4**

March 31, 2015  
Invoice #: 901559  
GST #: 87937 6127 RT0003

Attention: Huey Lee

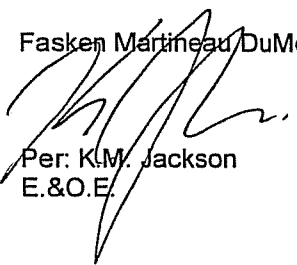
---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**

**For Professional Services rendered through February 28, 2015 as described in the attached memorandum**

Total Fees	\$ 5,737.50
Total Disbursements	132.33
Total Taxes	694.63
<b>Total Amount Owing This Bill</b>	<b>CAD \$ 6,564.46</b>

Fasken Martineau DuMoulin LLP



Per: K.M. Jackson  
E.&O.E.

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

Vancouver    Calgary    Toronto    Ottawa    Montréal    Québec City    London    Paris    Johannesburg

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile



Deloitte & Touche LLP  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

March 31, 2015  
Invoice #: 901559  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**FEE MEMORANDUM**

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

01/29/2015	Numerous emails with counsel for purchaser's office regarding documents needed for closing of sale of Malaspina Straits; numerous emails and telephone calls with Paul Chambers regarding same; email from counsel for BMO confirming delivery of executed Form 7 discharge.	Danielle R. Toigo	Associate	0.90 hrs.	360.00/hr	\$ 324.00
01/30/2015	Emails with counsel for Imperial Paving regarding Form 7 discharge document; telephone call to Vessel Registry regarding same; review, consider and revise undertaking letter; emails with office for purchaser's counsel regarding same; instruct on delivery of materials to same.	Danielle R. Toigo	Associate	1.50 hrs.	360.00/hr	\$ 540.00
02/02/2015	Emails with Sera Hallett regarding discussion with Transport Canada and following up with same on delivery of declaration for discharge of Imperial Paving mortgage.	Danielle R. Toigo	Associate	0.10 hrs.	360.00/hr	\$ 36.00
02/03/2015	Draft and send email to Paul Chambers updating on closing of sale of Malaspina Straits.	Danielle R. Toigo	Associate	0.30 hrs.	360.00/hr	\$ 108.00
02/04/2015	Emails with purchaser's counsel regarding status of registration of bill of sale for Malaspina Straits; emails with Paul Chambers regarding same.	Danielle R. Toigo	Associate	0.30 hrs.	360.00/hr	\$ 108.00
02/05/2015	Numerous emails and telephone calls with Vessel Registry regarding process for discharging mortgage from vessel.	Danielle R. Toigo	Associate	0.90 hrs.	360.00/hr	\$ 324.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

Page 3  
 Invoice #: 901559

02/06/2015	Review email from Transport Canada confirming it will discharge marine mortgages; emails with Kibben Jackson regarding extending closing date; emails to purchaser's counsel regarding same; further emails with purchaser's counsel confirming registration of Malaspina Straits and transfer of funds.	Danielle R. Toigo	Associate	0.60 hrs.	360.00/hr	\$ 216.00
02/10/2015	Numerous emails with Paul Chambers regarding closing and delivery of closing documents; instruct on discharge of financing statements against Malaspina Straits from BC Personal Property Registry; review same; draft cover letter to purchaser's counsel enclosing closing documents.	Danielle R. Toigo	Associate	0.90 hrs.	360.00/hr	\$ 324.00
02/10/2015	Discharge financing statement; file partial release of collateral.	E.S. Hui	Secretary	0.30 hrs.	205.00/hr	\$ 61.50
02/11/2015	Emails with counsel for mortgagees confirming closing of sale; email to Paul Chambers regarding same.	Danielle R. Toigo	Associate	0.20 hrs.	360.00/hr	\$ 72.00
02/16/2015	Conference with Kibben Jackson regarding ships sold by Receiver without vesting order being obtained to discharge mortgages on title; review and consider email from Kibben Jackson and materials regarding same.	Danielle R. Toigo	Associate	0.40 hrs.	360.00/hr	\$ 144.00
02/17/2015	Draft, revise and finalize email to Paul Chambers regarding sold vessels with undischarged mortgages and plan for dealing with same; emails with Magnus Verbrugge regarding same.	Danielle R. Toigo	Associate	1.60 hrs.	360.00/hr	\$ 576.00
02/17/2015	Conferences with Danielle Toigo regarding sale of vessels and discharge of mortgages; review emails exchanged between Danielle Toigo and Paul Chambers regarding same.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
02/18/2015	Emails with Mr. Verbrugge regarding service of petition on Allied Shipbuilders; draft letter to same regarding discharge of mortgage; emails with Paul Chambers regarding same.	Danielle R. Toigo	Associate	1.20 hrs.	360.00/hr	\$ 432.00
02/18/2015	Review and respond to emails regarding status and action plan.	M.D. Parrish	Partner	0.20 hrs.	450.00/hr	\$ 90.00



**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

Page 4  
 Invoice #: 901559

02/19/2015	Review and respond to emails regarding status of coverage dispute; review correspondence from insurance counsel; research and consider legal issue regarding insurer response.	M.D. Parrish	Partner	0.80 hrs.	450.00/hr	\$ 360.00
02/20/2015	Review correspondence from Jason Kostyniuk regarding coverage claim; review correspondence from and texts regarding coverage claim issues; consider strategy; draft email to BMO counsel regarding issues; draft report to Deloitte.	M.D. Parrish	Partner	2.00 hrs.	450.00/hr	\$ 900.00
02/23/2015	Review Form 7 mortgage discharges provided by BMO with respect to Transporter No. 2 and other vessels; emails with Paul Chambers regarding same and regarding sale of Coast VII.	Danielle R. Toigo	Associate	0.30 hrs.	360.00/hr	\$ 108.00
02/23/2015	Continue developing legal strategy and action items; report to Deloitte regarding update.	M.D. Parrish	Partner	0.70 hrs.	450.00/hr	\$ 315.00
02/24/2015	Emails with Magnus Verbrugge requesting mortgage discharge for Coast VII and BMO acceptance of sale price; emails with Paul Chambers regarding same; commence drafting letter to Vessel Registry regarding discharge of mortgages.	Danielle R. Toigo	Associate	0.60 hrs.	360.00/hr	\$ 216.00
02/25/2015	Revise and finalize letter to Vessel Registry requesting discharge of mortgages; emails with Paul Chambers and Magnus Verbrugge regarding BMO acceptance on purchase price of Coast VII.	Danielle R. Toigo	Associate	0.50 hrs.	360.00/hr	\$ 180.00
02/25/2015	Review and respond to emails regarding status and strategy; consider issues regarding reply to insurer.	M.D. Parrish	Partner	0.20 hrs.	450.00/hr	\$ 90.00
02/27/2015	Telephone call with Allied Shipbuilders regarding discharge of marine mortgage; draft and send email to Paul Chambers updating on same.	Danielle R. Toigo	Associate	0.30 hrs.	360.00/hr	\$ 108.00

Matter Number: 242587.00098  
Matter: Katzie Group of Companies  
Responsible Professional: K.M. Jackson

Page 5  
Invoice #: 901559

**Professional Summary**

<u>Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
K.M. Jackson	Partner	525.00	0.20	105.00
M.D. Parrish	Partner	450.00	3.90	1,755.00
Danielle R. Toigo	Associate	360.00	10.60	3,816.00
E.S. Hui	Secretary	205.00	0.30	61.50
	Total		15.00	CAD \$ 5,737.50

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

Page 6  
 Invoice #: 901559

<b>Our Fees</b>	<b>\$ 5,737.50</b>
GST	286.88
BCPST	401.63
<b>Total Fees Including Taxes</b>	<b>\$ 6,426.01</b>

**Disbursements**

Non-Taxable

02/10/15	BC Online Searches/Queries 433108I - PARTIAL DISCHARGE/242587.00098/BPD051/10/02/2015/HUI, ELAINE (P)	10.00
----------	---	-------

Taxable

01/26/15	Lasercopy	6.00
02/05/15	Lasercopy	0.40
02/05/15	Lasercopy	0.40
02/05/15	Lasercopy	0.80
02/06/15	Lasercopy	4.00
02/10/15	Lasercopy	1.60
02/10/15	Lasercopy	0.40
02/10/15	Lasercopy	1.60
02/10/15	BC Online Searches/Queries 433108I - PARTIAL	1.50
02/10/15	Lasercopy	0.80
02/11/15	Lasercopy	0.40
02/11/15	Lasercopy	5.60
02/11/15	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	3.20
02/11/15	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	3.20
02/11/15	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	0.80
02/11/15	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	0.80
02/11/15	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	0.80
02/11/15	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	0.40
02/11/15	Postage	1.65
02/11/15	Delivery/Courier Expense /CORPORATE	3.01
02/11/15	Delivery/Courier Expense	7.80

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

Page 7  
 Invoice #: 901559

	/CORPORATE	
02/17/15	Lasercopy	1.60
02/18/15	Lasercopy	0.80
02/19/15	Lasercopy	24.40
02/19/15	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	0.80
02/19/15	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	0.80
02/20/15	Lasercopy	0.40
02/20/15	Delivery/Courier Expense /CORPORATE	6.57
02/23/15	Lasercopy	2.00
02/23/15	Lasercopy	0.40
02/25/15	Lasercopy	1.20
02/25/15	Lasercopy	7.60
02/25/15	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	8.00
02/25/15	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	8.00
02/25/15	Delivery/Courier Expense FedEx - 728674502,	14.60
	Total Disbursements	132.33
	GST	6.12
	Total Disbursements Including Taxes	138.45
	<b>Total Fees, Disbursements and Taxes</b>	<b>CAD \$ 6,564.46</b>

**Tax Summary**

GST	293.00
BCPST	401.63
Total Taxes Included in This Bill	694.63

Fasken Martineau DuMoulin LL.  
Barristers and Solicitors  
Patent and Trade-mark Agents



2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

Deloitte & Touche LLP  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

March 31, 2015  
Invoice #: 901559  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**REMITTANCE COPY**  
Please return with your payment

---

Matter Number: 242587.00098  
Matter: Katzie Group of Companies  
Responsible Professional: K.M. Jackson

For Professional Services rendered through February 28, 2015 as described in the attached memorandum

Total Fees	\$ 5,737.50
Total Disbursements	132.33
Total Taxes	694.63
<b>Total Amount Owing This Bill</b>	<b>CAD \$ 6,564.46</b>

**Tax Summary**

GST	293.00
BCPST	401.63
<b>Total Taxes Included in This Bill</b>	<b>694.63</b>

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

This is Exhibit I referred to in the  
affidavit of Kibben Jackson  
made before me on this 22  
day of October 20 15  
197

A Commissioner for taking  
Affidavits for British Columbia

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile



**Deloitte & Touche LLP**  
**2800 - 1055 Dunsmuir Street**  
**PO Box 49279**  
**Vancouver, BC V7X 1P4**

June 02, 2015  
Invoice #: 918072  
GST #: 87937 6127 RT0003

Attention: Huey Lee

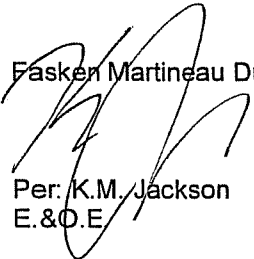
---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**

**For Professional Services rendered through April 30, 2015 as described in the attached memorandum**

Total Fees	\$ 4,104.50
Total Disbursements	49.30
Total Taxes	495.01
<b>Total Amount Owing This Bill</b>	<b>CAD \$ 4,648.81</b>

Fasken Martineau DuMoulin LLP



Per: K.M. Jackson  
E.&O.E

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

Fasken Martineau DuMoulin  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile



**Deloitte & Touche LLP**  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

June 02, 2015  
Invoice #: 918072  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**FEE MEMORANDUM**

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

03/03/2015	Emails with Magnus Verbrugge following up on discharge of BMO mortgage for Coast VII; emails with Paul Chambers confirming BMO mortgage discharge for vessels previously sold.	Danielle R. Toigo	Associate	0.20 hrs.	360.00/hr	\$ 72.00
03/05/2015	Emails with Paul Chambers regarding closing of sale of Coast VII.	Danielle R. Toigo	Associate	0.20 hrs.	360.00/hr	\$ 72.00
03/05/2015	Review and respond to e-mails regarding request from insurer; continue analyzing and advising on reply to insurer; telephone conference with Graham Walker.	M.D. Parrish	Partner	0.30 hrs.	450.00/hr	\$ 135.00
03/06/2015	Emails with Paul Chambers confirming sale of Coast VII.	Danielle R. Toigo	Associate	0.10 hrs.	360.00/hr	\$ 36.00
03/06/2015	Review and respond to e-mails regarding further request for information by insurer; research legal position regarding request by insurer; formulate strategy.	M.D. Parrish	Partner	0.40 hrs.	450.00/hr	\$ 180.00
03/09/2015	Draft letter to Vessel Registry enclosing BMO mortgage discharge; follow up with Allied Shipbuilders by email regarding the mortgage discharge.	Danielle R. Toigo	Associate	0.40 hrs.	360.00/hr	\$ 144.00
03/10/2015	Review mortgage discharge from Allied Shipbuilders; draft letter to Vessel Registry enclosing same.	Danielle R. Toigo	Associate	0.20 hrs.	360.00/hr	\$ 72.00



**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

03/12/2015	Receive voicemail from Vessel Registry regarding rejection of discharge of Allied Shipbuilders' mortgage.				
	Danielle R. Toigo	Associate	0.10 hrs.	360.00/hr	\$ 36.00
03/12/2015	Telephone conversation with and letter from counsel for Kleaman regarding lifting stay to proceed with Warrior Marine Services litigation; emails exchanged with Paul Chambers regarding same; review letter from counsel for Warrior Marine with respect to same; emails exchanged and telephone conversation with counsel for Warrior Marine regarding lifting stay; further emails exchanged with client regarding same.				
	K.M. Jackson	Partner	0.50 hrs.	525.00/hr	\$ 262.50
03/13/2015	Telephone conversation with counsel for Kleaman regarding lifting stay to permit action to proceed and issues pertaining to same.				
	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
03/13/2015	Review and respond to e-mails regarding status and instructions.				
	M.D. Parrish	Partner	0.20 hrs.	450.00/hr	\$ 90.00
03/17/2015	Conference with Michael Parrish regarding insurance claim; email to counsel for Katzie First Nation regarding same and intention of bank to terminate.				
	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
03/17/2015	Review and respond to e-mails regarding status and strategy.				
	M.D. Parrish	Partner	0.20 hrs.	450.00/hr	\$ 90.00
03/19/2015	Email to Paul Chambers delivering discharge of BMO mortgage from Coast VII.				
	Danielle R. Toigo	Associate	0.10 hrs.	360.00/hr	\$ 36.00
03/19/2015	Review correspondence from counsel for Warrior Marine and for Kleaman regarding applications to list stay and other relief; emails exchanged with foregoing persons regarding application and position of receiver.				
	K.M. Jackson	Partner	0.30 hrs.	525.00/hr	\$ 157.50
03/20/2015	Draft and send email to Paul Chambers regarding correspondence with Vessel Registry and rejection of discharge of Allied Shipbuilders.				
	Danielle R. Toigo	Associate	0.50 hrs.	360.00/hr	\$ 180.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

03/20/2015	Teleconference with Michael Parrish and counsel for Katzie First Nation regarding outstanding insurance claim and issues pertaining to same; emails exchanged with Paul Chambers and Huey Lee regarding same.	K.M. Jackson	Partner	0.80 hrs.	525.00/hr	\$ 420.00
03/20/2015	Prepare for and attend teleconference with counsel for Katzie; research, consider and advise regarding limitation issue; review and respond to e-mails with counsel for Katzie and Deloitte.	M.D. Parrish	Partner	1.50 hrs.	450.00/hr	\$ 675.00
03/20/2015	Conference with and emails from Danielle Toigo regarding discharge of mortgage on Transporter No. 2.	Vicki Tickle	Associate	0.20 hrs.	450.00/hr	\$ 90.00
03/24/2015	Letter from Transport Canada regarding discharge of mortgage with respect to Coast VII; instructions to Sera Hallett and email to Paul Chambers regarding same.	Vicki Tickle	Associate	0.10 hrs.	450.00/hr	\$ 45.00
03/27/2015	Review and respond to e-mails regarding disposal of barge; consider and advise on issues regarding sale and disposal.	M.D. Parrish	Partner	0.40 hrs.	450.00/hr	\$ 180.00
03/31/2015	Review email from Michael Parrish regarding anticipated result if port of Vancouver disposes of barge; email to Gordon Plotel to advise of inquiries by port of Vancouver in that regard and concerns with respect to same.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
04/01/2015	Telephone conversation with counsel for Port Authority regarding barge and disposal of same; email from Huey Lee regarding same.	K.M. Jackson	Partner	0.30 hrs.	525.00/hr	\$ 157.50
04/02/2015	Review and respond to numerous e-mails regarding proposed sale of vessel; consider and advise upon insurance and sale issues; review and respond to e-mails from counsel for insurer regarding change of firms.	M.D. Parrish	Partner	0.50 hrs.	450.00/hr	\$ 225.00
04/06/2015	Emails exchanged with counsel for Katzi First Nation regarding timing for decision as to whether to persue insurance claim.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

04/09/2015 Research and summarize the law regarding jurisdiction of Transport Canada and administrative procedure to seize and sell private vessels.  
 Samantha W.S. Associate 0.80 hrs. 280.00/hr \$ 224.00  
 Chang

04/15/2015 Emails exchanged with Gordon Plotel and Huey Lee regarding discharge of receiver and pursuit of insurance claims; conference with Michael Parrish regarding same.  
 K.M. Jackson Partner 0.20 hrs. 525.00/hr \$ 105.00

**Professional Summary**

<u>Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
K.M. Jackson	Partner	525.00	2.90	1,522.50
M.D. Parrish	Partner	450.00	3.50	1,575.00
Vicki Tickle	Associate	450.00	0.30	135.00
Danielle R. Toigo	Associate	360.00	1.80	648.00
Samantha W.S. Chang	Associate	280.00	0.80	224.00
		Total	9.30	CAD \$ 4,104.50

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

<b>Our Fees</b>	<b>\$ 4,104.50</b>
GST	205.23
BCPST	287.32
	<hr/>
Total Fees Including Taxes	<u>\$ 4,597.05</u>

**Disbursements**

Taxable

03/09/15	Lasercopy	1.20
03/09/15	Lasercopy	3.20
03/09/15	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	2.00
03/09/15	Delivery/Courier Expense FedEx - 728826354,	14.45
03/10/15	Delivery/Courier Expense FedEx - 728826354,	14.45
03/10/15	Photocopies /VAN - 1c1s 27th Floor Xerox 5775	1.20
03/10/15	Lasercopy	0.40
03/10/15	Lasercopy	0.80
03/11/15	Lasercopy	0.40
03/11/15	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	0.80
03/11/15	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	1.20
03/20/15	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	2.40
03/24/15	Document Scan /VAN - 1c1s 27th Floor Xerox 5775	0.80
04/14/15	Lasercopy	4.00
04/23/15	Document Scan /VAN - 1c1s 26th Floor Xerox 5775	1.20
04/23/15	Document Scan /VAN - 1c1s 26th Floor Xerox 5775	0.80
		<hr/>
Total Disbursements		49.30
GST		2.46
		<hr/>
Total Disbursements Including Taxes		51.76

**Total Fees, Disbursements and Taxes** CAD \$ 4,648.81

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

**Tax Summary**

GST	207.69
BCPST	287.32
Total Taxes Included in This Bill	<u>495.01</u>

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents



2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**Deloitte & Touche LLP**  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

June 02, 2015  
Invoice #: 918072  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**REMITTANCE COPY**  
**Please return with your payment**

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

**For Professional Services rendered through April 30, 2015 as described in the attached memorandum**

Total Fees	\$ 4,104.50
Total Disbursements	49.30
Total Taxes	495.01
<b>Total Amount Owing This Bill</b>	<b>CAD \$ 4,648.81</b>

<b>Tax Summary</b>	
GST	207.69
BCPST	287.32
Total Taxes Included in This Bill	<u>495.01</u>

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

This is Exhibit J referred to in the  
affidavit of Kibben Jackson  
made before me on this 22  
day of October 20 15

---

A Commissioner for taking  
Affidavits for British Columbia

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile



**Deloitte & Touche LLP**  
**2800 - 1055 Dunsmuir Street**  
**PO Box 49279**  
**Vancouver, BC V7X 1P4**

June 08, 2015  
Invoice #: 919069  
GST #: 87937 6127 RT0003

Attention: Huey Lee

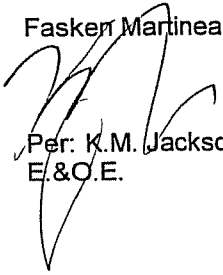
---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**

**For Professional Services rendered through May 31, 2015 as described in the attached memorandum**

Total Fees	\$ 5,830.50
Total Disbursements	35.60
Total Taxes	701.45
<b>Total Amount Owing This Bill</b>	<b><u>CAD \$ 6,567.55</u></b>

Fasken Martineau DuMoulin LLP

  
Per: K.M. Jackson  
E.&O.E.

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532



Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile



**Deloitte & Touche LLP**  
**2800 - 1055 Dunsmuir Street**  
**PO Box 49279**  
**Vancouver, BC V7X 1P4**

June 08, 2015  
Invoice #: 919069  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**FEE MEMORANDUM**

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

05/04/2015	E-mails with Paul Chambers updating on call to Allied Shipbuilders. Danielle R. Toigo Associate	0.10 hrs.	360.00/hr	\$ 36.00
05/05/2015	Review e-mail from Paul Chambers regarding report and issues with respect to bank security and guarantees in light of realizations; begin reviewing history of matter, including schedules of realizations and security. K.M. Jackson Partner	0.40 hrs.	525.00/hr	\$ 210.00
05/06/2015	Continue analysis of security position and recovery; e-mails exchanged with Paul Chambers regarding same. K.M. Jackson Partner	0.30 hrs.	525.00/hr	\$ 157.50
05/07/2015	Telephone conversation with Paul Chambers regarding marshalling question and security review. K.M. Jackson Partner	0.20 hrs.	525.00/hr	\$ 105.00
05/12/2015	E-mail to Paul Chambers. Danielle R. Toigo Associate	0.10 hrs.	360.00/hr	\$ 36.00
05/15/2015	Telephone call with Paul Chambers regarding discharge application and distribution to BMO; review and consider receivership order related to same; e-mails with same regarding same. Danielle R. Toigo Associate	0.60 hrs.	360.00/hr	\$ 216.00
05/15/2015	Telephone conference with Paul Chambers regarding status and action items report. M.D. Parrish Partner	0.20 hrs.	450.00/hr	\$ 90.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

05/22/2015	Review, consider and respond to e-mails from Paul Chambers regarding drafting of discharge materials; e-mail to Michael Parrish with Receiver's report.	Danielle R. Toigo	Associate	0.40 hrs.	360.00/hr	\$ 144.00
05/25/2015	Review and revise Receiver's Third Report; e-mails with Michael Parrish regarding same; commence drafting application materials for discharge application.	Danielle R. Toigo	Associate	3.70 hrs.	360.00/hr	\$ 1,332.00
05/26/2015	Continue reviewing and revising third report of the Receiver's; send same to Kibben Jackson for review.	Danielle R. Toigo	Associate	3.40 hrs.	360.00/hr	\$ 1,224.00
05/26/2015	Review and revise report to Court.	M.D. Parrish	Partner	0.30 hrs.	450.00/hr	\$ 135.00
05/27/2015	Draft affidavit #1 of Huey Lee; draft affidavit to be sworn by Fasken's; continue drafting and revising Third Report of the Receiver.	Danielle R. Toigo	Associate	1.80 hrs.	360.00/hr	\$ 648.00
05/28/2015	Draft notice of application for discharge application; further draft and revise third report of receiver; e-mail same to Paul Chambers and Huey Lee with comment.	Danielle R. Toigo	Associate	2.50 hrs.	360.00/hr	\$ 900.00
05/29/2015	Review Kibben Jackson's comments and e-mail on Receiver's Report.	Danielle R. Toigo	Associate	0.20 hrs.	360.00/hr	\$ 72.00
05/29/2015	Review and draft amendments to report of Deloitte in support of application for discharge and approval of activities and fees; e-mail same to client and Danielle Toigo with comments regarding same and strategy generally.	K.M. Jackson	Partner	1.00 hrs.	525.00/hr	\$ 525.00

**Professional Summary**

<u>Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
K.M. Jackson	Partner	525.00	1.90	997.50
M.D. Parrish	Partner	450.00	0.50	225.00
Danielle R. Toigo	Associate	360.00	12.80	4,608.00
	<b>Total</b>		<b>15.20</b>	<b>CAD \$ 5,830.50</b>

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

Page 4  
Invoice #: 919069

Matter Number: 242587.00098  
Matter: Katzie Group of Companies  
Responsible Professional: K.M. Jackson

<b>Our Fees</b>	<b>\$ 5,830.50</b>
GST	291.53
BCPST	408.14
Total Fees Including Taxes	<u>\$ 6,530.17</u>

**Disbursements**

Taxable

05/15/15	Lasercopy	0.40
05/19/15	Lasercopy	2.80
05/19/15	Lasercopy	0.40
05/22/15	Lasercopy	9.60
05/26/15	Lasercopy	19.20
05/29/15	Lasercopy	3.20
Total Disbursements		<u>35.60</u>
GST		1.78
Total Disbursements Including Taxes		<u>37.38</u>

**Total Fees, Disbursements and Taxes** **CAD \$ 6,567.55**

**Tax Summary**

GST	293.31
BCPST	408.14
Total Taxes Included in This Bill	<u>701.45</u>

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile



**Deloitte & Touche LLP**  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

June 08, 2015  
Invoice #: 919069  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**REMITTANCE COPY**  
**Please return with your payment**

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

**For Professional Services rendered through May 31, 2015 as described in the attached memorandum**

Total Fees	\$ 5,830.50
Total Disbursements	35.60
Total Taxes	701.45
<b>Total Amount Owing This Bill</b>	<b><u>CAD \$ 6,567.55</u></b>

**Tax Summary**

GST	293.31
BCPST	408.14
Total Taxes Included in This Bill	<u>701.45</u>

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

This is Exhibit K referred to in the  
affidavit of Kimber Saksen  
made before me on this 22  
day of October 20 15  
B.C.

A Commissioner for taking  
Affidavits for British Columbia

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile



Deloitte & Touche LLP  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

July 14, 2015  
Invoice #: 928335  
GST #: 87937 6127 RT0003

Attention: Huey Lee

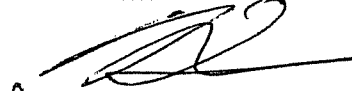
---

Matter Number: 242587.00098  
Matter: Katzie Group of Companies

For Professional Services rendered through June 30, 2015 as described in the attached memorandum

Total Fees	\$ 442.50
Total Disbursements	8.40
Total Taxes	53.53
<b>Total Amount Owing This Bill</b>	<b>CAD \$ 504.43</b>

Fasken Martineau DuMoulin LLP

  
Per: K.M. Jackson  
E.&O.E.

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile



Deloitte & Touche LLP  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

July 14, 2015  
Invoice #: 928335  
GST #: 87937 6127 RT0003

Attention: Huey Lee

### FEE MEMORANDUM

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

06/01/2015	Telephone conversation with Paul Chambers regarding dealings with Vancouver Sand and Gravel with respect to fee claim in relation to discharge application.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
06/05/2015	Review status of ongoing witness interviews and fact investigation and email to Gordan Plottel regarding status.	M.D. Parrish	Partner	0.40 hrs.	450.00/hr	\$ 180.00
06/08/2015	Review Notice of Civil Claim forwarded by counsel for Kleaman; email to counsel for claimant regarding stay of proceedings and addressing claim generally; forward communications to client.	K.M. Jackson	Partner	0.30 hrs.	525.00/hr	\$ 157.50

### Professional Summary

<u>Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
K.M. Jackson	Partner	525.00	0.50	262.50
M.D. Parrish	Partner	450.00	0.40	180.00
	Total		0.90	CAD \$ 442.50



Matter Number: 242587.00098  
Matter: Katzie Group of Companies  
Responsible Professional: K.M. Jackson

<b>Our Fees</b>		<b>\$ 442.50</b>
GST		22.13
BCPST		30.98
Total Fees Including Taxes		<u>\$ 495.61</u>
<b>Disbursements</b>		
<u>Taxable</u>		
06/04/15	Lasercopy	3.20
06/05/15	Lasercopy	3.60
06/05/15	Lasercopy	1.60
Total Disbursements		<u>8.40</u>
GST		0.42
Total Disbursements Including Taxes		<u>8.82</u>
<b>Total Fees, Disbursements and Taxes</b>		<u><b>CAD \$ 504.43</b></u>

<b>Tax Summary</b>		
GST		22.55
BCPST		30.98
Total Taxes Included in This Bill		<u>53.53</u>

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile



Deloitte & Touche LLP  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

July 14, 2015  
Invoice #: 928335  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**REMITTANCE COPY**  
Please return with your payment

---

Matter Number: 242587.00098  
Matter: Katzie Group of Companies  
Responsible Professional: K.M. Jackson

For Professional Services rendered through June 30, 2015 as described in the attached memorandum

Total Fees	\$ 442.50
Total Disbursements	8.40
Total Taxes	53.53
<b>Total Amount Owing This Bill</b>	<b>CAD \$ 504.43</b>

**Tax Summary**

GST	22.55
BCPST	30.98
<b>Total Taxes Included in This Bill</b>	<b>53.53</b>

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

This is Exhibit L referred to in the affidavit of Kibben Jackson

made before me on this 22

day of October 20 15

B.T.C.  
A Commissioner for taking Affidavits for British Columbia

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents



2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**Deloitte & Touche LLP**  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

August 17, 2015  
Invoice #: 936615  
GST #: 87937 6127 RT0003

Attention: Huey Lee

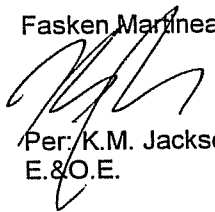
---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**

**For Professional Services rendered through July 31, 2015 as described in the attached memorandum**

Total Fees	\$ 4,249.50
Total Disbursements	16.40
Total Taxes	510.77
<b>Total Amount Owing This Bill</b>	<b>CAD \$ 4,776.67</b>

Fasken Martineau DuMoulin LLP



Per: K.M. Jackson  
E.&O.E.

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile



Deloitte & Touche LLP  
2800 - 1055 Dunsmiur Street  
PO Box 49279  
Vancouver, BC V7X 1P4

August 17, 2015  
Invoice #: 936615  
GST #: 87937 6127 RT0003

Attention: Huey Lee

### FEE MEMORANDUM

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

07/02/2015	Emails exchanged with Paul Chambers regarding discussion with Vancouver Sand & Gravel and potential settlement. K.M. Jackson Partner	0.20 hrs.	525.00/hr	\$ 105.00
07/10/2015	Telephone conversation with Huey Lee regarding settlement with Vancouver Sand & Gravel; emails exchanged with Paul Chambers and Huey Lee regarding same. K.M. Jackson Partner	0.30 hrs.	525.00/hr	\$ 157.50
07/14/2015	Review and consider emails from Paul Chambers setting out terms of settlement between Receiver and Vancouver Sand & Gravel and Bryan Hall; telephone call with Mr. Chambers regarding same; review settlement agreement and tolling agreement for background on same; draft agreement revising terms of lease payment and send to Kibben Jackson for review with comment. Danielle R. Toigo Associate	2.20 hrs.	360.00/hr	\$ 792.00
07/15/2015	Review Kibben Jackson's comments on the settlement agreement; revise same and send to Paul Chambers for comment with review. Danielle R. Toigo Associate	0.60 hrs.	360.00/hr	\$ 216.00
07/15/2015	Review and draft amendments to settlement agreement prepared by Danielle Toigo; emails exchanged with Danielle Toigo regarding same. K.M. Jackson Partner	0.40 hrs.	525.00/hr	\$ 210.00
07/16/2015	Telephone call with Paul Chambers. Danielle R. Toigo Associate	0.10 hrs.	360.00/hr	\$ 36.00
07/17/2015	Emails with Paul Chambers and Kibben Jackson regarding settlement agreement. Danielle R. Toigo Associate	0.10 hrs.	360.00/hr	\$ 36.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

07/21/2015	Review comments on settlement agreement from Bryan Hall; review emails from Kibben Jackson regarding same; commence revising settlement agreement.	Danielle R. Toigo	Associate	0.70 hrs.	360.00/hr	\$ 252.00
07/21/2015	Telephone conversation and emails exchanged with counsel for Kleaman regarding settlement between receiver and Vancouver Sand & Gravel and impact of same on Kleaman; emails exchanged with client regarding same; review amended draft of settlement agreement forwarded by counsel for Vancouver Sand & Gravel; email to client with comments on same.	K.M. Jackson	Partner	1.10 hrs.	525.00/hr	\$ 577.50
07/22/2015	Continue revising settlement agreement; send same to Kibben Jackson for review with comment; emails with same regarding same.	Danielle R. Toigo	Associate	1.20 hrs.	360.00/hr	\$ 432.00
07/22/2015	Review amended draft of settlement agreement prepared by Danielle Toigo; email to Danielle Toigo with comments regarding further changes to same.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
07/23/2015	Finalize revised settlement agreement; send to counsel for Bryan Hall with comment; emails with same and Kibben Jackson regarding same.	Danielle R. Toigo	Associate	0.80 hrs.	360.00/hr	\$ 288.00
07/23/2015	Review amended draft of settlement agreement prepared by Danielle Toigo; email to Danielle Toigo regarding same; emails exchanged with counsel for Vancouver Sand & Gravel regarding communications with counsel for Kleaman.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
07/24/2015	Emails exchanged with counsel for Vancouver Sand & Gravel and with counsel for Kleaman regarding finalizing agreement; emails exchanged and telephone conversation with Betty Torsky regarding discharge of BMO security.	K.M. Jackson	Partner	0.30 hrs.	525.00/hr	\$ 157.50
07/28/2015	Emails exchanged with counsel for Vancouver Sand & Gravel and review draft no interest letter; telephone conversation with counsel for Kleaman regarding settlement.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
07/28/2015	Review and respond to e-mails regarding further insurance related claim; review policy regarding issues.	M.D. Parrish	Partner	0.50 hrs.	450.00/hr	\$ 225.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

07/29/2015	Review letter from counsel for Kleaman regarding payment of commission; forward same to Paul Chambers and Hui Lee with comments and seeking instructions with respect to response.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
07/30/2015	Numerous emails exchanged with counsel for Kleaman regarding settlement and entitlement of Kleaman to commission payment.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
07/30/2015	Telephone conference with Justin Katz regarding insurance claim; review correspondence from Justin Katz regarding claim; review policy.	M.D. Parrish	Partner	0.30 hrs.	450.00/hr	\$ 135.00
07/31/2015	Emails exchanged with counsel for Kleaman regarding payment of commission; emails exchanged with Paul Chambers and Huey Lee regarding same.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00

**Professional Summary**

<u>Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
K.M. Jackson	Partner	525.00	3.50	1,837.50
M.D. Parrish	Partner	450.00	0.80	360.00
Danielle R. Toigo	Associate	360.00	5.70	2,052.00
		Total	10.00	CAD \$ 4,249.50

Matter Number: 242587.00098  
Matter: Katzie Group of Companies  
Responsible Professional: K.M. Jackson

<b>Our Fees</b>	<b>\$ 4,249.50</b>
GST	212.48
BCPST	297.47
	<hr/>
Total Fees Including Taxes	<b>\$ 4,759.45</b>

**Disbursements**

Taxable

07/14/15	Lasercopy	10.40
07/15/15	Lasercopy	3.20
07/23/15	Lasercopy	2.80
		<hr/>
Total Disbursements		16.40
GST		0.82
		<hr/>
Total Disbursements Including Taxes		17.22

**Total Fees, Disbursements and Taxes** **CAD \$ 4,776.67**

**Tax Summary**

GST	213.30
BCPST	297.47
	<hr/>
Total Taxes Included in This Bill	<b>510.77</b>



Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents



2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**Deloitte & Touche LLP**  
**2800 - 1055 Dunsmuir Street**  
**PO Box 49279**  
**Vancouver, BC V7X 1P4**

August 17, 2015  
Invoice #: 936615  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**REMITTANCE COPY**  
**Please return with your payment**

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

**For Professional Services rendered through July 31, 2015 as described in the attached memorandum**

Total Fees	\$ 4,249.50
Total Disbursements	16.40
Total Taxes	510.77
<b>Total Amount Owing This Bill</b>	<b>CAD \$ 4,776.67</b>

<b>Tax Summary</b>	
GST	213.30
BCPST	297.47
Total Taxes Included in This Bill	<u>510.77</u>

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

This is Exhibit M referred to in the  
affidavit of Kibben Jackson  
made before me on this 22  
day of October 2015  
BT

A Commissioner for taking  
Affidavits for British Columbia

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**FASKEN  
MARTINEAU** 

**Deloitte & Touche LLP**  
**2800 - 1055 Dunsmuir Street**  
**PO Box 49279**  
**Vancouver, BC V7X 1P4**

September 24, 2015  
Invoice #: 947505  
GST #: 87937 6127 RT0003

Attention: Huey Lee

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**

**For Professional Services rendered through August 31, 2015 as described in the attached memorandum**

Total Fees	\$ 1,378.50
Total Taxes	165.43
<b>Total Amount Owing This Bill</b>	<b>CAD \$ 1,543.93</b>

Fasken Martineau DuMoulin LLP

*DTU*

*FOR* Per: K.M. Jackson  
E.&O.E.

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

Vancouver    Calgary    Toronto    Ottawa    Montréal    Québec City    London    Paris    Johannesburg

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**FASKEN  
MARTINEAU** 

**Deloitte & Touche LLP**  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

September 24, 2015  
Invoice #: 947505  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**FEE MEMORANDUM**

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

08/04/2015	Telephone call with counsel for BMO. Danielle R. Toigo Associate	0.10 hrs.	360.00/hr	\$ 36.00
08/06/2015	Telephone conversation with counsel for Kleaman regarding entitlement to commission payment from Vancouver Sand & Gravel; telephone conversation with Paul Chambers regarding same and strategy for dealing with claim in terms of settlement; voicemail for counsel for Vancouver Sand & Gravel regarding same. K.M. Jackson Partner	0.70 hrs.	525.00/hr	\$ 367.50
08/06/2015	Email to Mr. Katz regarding insurance claim. M.D. Parrish Partner	0.20 hrs.	450.00/hr	\$ 90.00
08/07/2015	Telephone conversation with counsel for Vancouver Sand & Gravel regarding status of negotiations with Kleaman. K.M. Jackson Partner	0.20 hrs.	525.00/hr	\$ 105.00
08/10/2015	Review and respond to e-mails regarding abandonment of vessel. M.D. Parrish Partner	0.30 hrs.	450.00/hr	\$ 135.00
08/18/2015	Telephone conversation with counsel for Kleaman regarding settlement and terms thereof. K.M. Jackson Partner	0.20 hrs.	525.00/hr	\$ 105.00
08/20/2015	Telephone conversation with Paul Chambers to advise as to conversation with counsel for Kleaman and discuss next steps. K.M. Jackson Partner	0.20 hrs.	525.00/hr	\$ 105.00

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

08/25/2015	Emails exchanged with counsel for Kleaman regarding timing for response; email to Paul Chambers and Hui Lee forwarding same.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
08/29/2015	Email from counsel for Kleaman regarding reopening negotiations with Vancouver Sand & Gravel; email to Huey Lee and Paul Chambers forwarding same with comments.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
08/31/2015	E-mail from Justin Katz regarding claim against Coast Marine; review and respond to e-mails regarding new claim; consider insurance issues.	M.D. Parrish	Partner	0.50 hrs.	450.00/hr	\$ 225.00

**Professional Summary**

<u>Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
K.M. Jackson	Partner	525.00	1.70	892.50
M.D. Parrish	Partner	450.00	1.00	450.00
Danielle R. Toigo	Associate	360.00	0.10	36.00
		Total	<u>2.80</u>	<u>CAD \$ 1,378.50</u>

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

Page 4  
Invoice #: 947505

<b>Our Fees</b>	<b>\$ 1,378.50</b>
GST	68.93
BCPST	96.50
Total Fees Including Taxes	<u>\$ 1,543.93</u>
<b>Total Fees, Disbursements and Taxes</b>	<b><u>CAD \$ 1,543.93</u></b>

**Tax Summary**

GST	68.93
BCPST	96.50
Total Taxes Included in This Bill	<u>165.43</u>

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents

2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile



**Deloitte & Touche LLP**  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

September 24, 2015  
Invoice #: 947505  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**REMITTANCE COPY**  
**Please return with your payment**

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

**For Professional Services rendered through August 31, 2015 as described in the attached memorandum**

Total Fees	\$ 1,378.50
Total Taxes	165.43
<b>Total Amount Owing This Bill</b>	<b><u>CAD \$ 1,543.93</u></b>

**Tax Summary**

GST	68.93
BCPST	96.50
<b>Total Taxes Included in This Bill</b>	<b><u>165.43</u></b>

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

This is Exhibit N referred to in the  
affidavit of Kirben Jackson  
made before me on this 22  
day of October 2015

BTL  
A Commissioner for taking  
Affidavits for British Columbia



Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents



2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**Deloitte & Touche LLP**  
**2800 - 1055 Dunsmuir Street**  
**PO Box 49279**  
**Vancouver, BC V7X 1P4**

October 13, 2015  
Invoice #: 951899  
GST #: 87937 6127 RT0003

Attention: Huey Lee

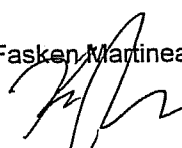
---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**

**For Professional Services rendered through September 30, 2015 as described in the attached memorandum**

Total Fees	\$ 1,942.50
Total Taxes	233.11
<b>Total Amount Owing This Bill</b>	<b>CAD \$ 2,175.61</b>

Fasken Martineau DuMoulin LLP



Per: K.M. Jackson  
E.&O.E.

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents



2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**Deloitte & Touche LLP**  
**2800 - 1055 Dunsmuir Street**  
**PO Box 49279**  
**Vancouver, BC V7X 1P4**

October 13, 2015  
Invoice #: 951899  
GST #: 87937 6127 RT0003

Attention: Huey Lee

### FEE MEMORANDUM

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

09/01/2015	Telephone conversation with Huey Lee and Paul Chambers regarding discussions with counsel for Kleaman and strategy for dealing with same; review emails from Michael Parrish to counsel requesting lifting stay to pursue insurance policy.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
09/03/2015	Emails exchanged with counsel for Kleaman, counsel for Vancouver Sand & Gravel and with client regarding re-opening settlement discussions and terms relating to same.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
09/14/2015	Email from counsel for Vancouver Sand & Gravel regarding settlement terms and renegotiating same; emails exchanged with Paul Chambers regarding same; email to counsel for Kleaman regarding same.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
09/15/2015	Emails exchanged with counsel for Kleaman regarding settlement and negotiation of sharing with respect to same; emails exchanged with Paul Chambers regarding same and regarding instructions of bank.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
09/16/2015	Telephone conversation with counsel for Bank of Montreal regarding status of negotiations with Kleaman and Vancouver Sand & Gravel and issues with respect to claim to fee under settlement agreement by Receiver; email to Magnus Verbrugge regarding same; emails exchanged with counsel for Kleaman regarding amended settlement offer and terms.	K.M. Jackson	Partner	0.50 hrs.	525.00/hr	\$ 262.50

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

09/17/2015	Emails exchanged with counsel for Kleaman regarding settlement proposal, including split of settlement proceeds; emails exchanged with Magus Verbrugge regarding same; emails exchanged with Paul Chambers regarding same; voicemail for counsel for Vancouver Sand & Gravel.	K.M. Jackson	Partner	0.30 hrs.	525.00/hr	\$ 157.50
09/21/2015	Emails exchanged with Receiver regarding consent of bank to settlement proposal; voicemail and email to counsel for Vancouver Sand & Gravel regarding discussion with respect to settlement.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
09/22/2015	Emails exchanged with counsel for Vancouver Sand & Gravel, counsel for Kleaman and counsel for Bank of Montreal regarding settlement; emails exchanged with client regarding same; draft amendments to settlement agreement and circulate to foregoing persons for review and comment.	K.M. Jackson	Partner	0.80 hrs.	525.00/hr	\$ 420.00
09/23/2015	Email from Paul Chambers with comments on draft settlement agreement and GST issue; emails exchanged with counsel for Kleaman regarding same; draft amendments to settlement agreement and circulate to counsel for parties and Receiver for comments.	K.M. Jackson	Partner	0.40 hrs.	525.00/hr	\$ 210.00
09/24/2015	Emails exchanged with counsel for Kleaman regarding form of settlement agreement; emails exchanged with Huey Lee and Paul Chambers regarding same.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
09/28/2015	Draft amendments to settlement agreement; emails exchanged with counsel for Vancouver Sand & Gravel regarding response to draft agreement.	K.M. Jackson	Partner	0.20 hrs.	525.00/hr	\$ 105.00
09/29/2015	Telephone conversation with Gord Plottel to explain basis for settlement with Vancouver Sand & Gravel and Kleaman; emails exchanged with Huey Lee, Paul Chambers and counsel for BMO regarding same.	K.M. Jackson	Partner	0.30 hrs.	525.00/hr	\$ 157.50

Matter Number: 242587.00098  
Matter: Katzie Group of Companies  
Responsible Professional: K.M. Jackson

**Professional Summary**

<u>Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
K.M. Jackson	Partner	525.00	3.70	1,942.50
		Total	<u>3.70</u>	<u>CAD \$ 1,942.50</u>

Matter Number: 242587.00098  
Matter: Katzie Group of Companies  
Responsible Professional: K.M. Jackson

Our Fees	\$ 1,942.50
GST	97.13
BCPST	135.98
Total Fees Including Taxes	<hr/> \$ 2,175.61
<b>Total Fees, Disbursements and Taxes</b>	<b><u>CAD \$ 2,175.61</u></b>

<b>Tax Summary</b>	
GST	97.13
BCPST	135.98
Total Taxes Included in This Bill	<hr/> 233.11

Fasken Martineau DuMoulin LLP  
Barristers and Solicitors  
Patent and Trade-mark Agents



2900 – 550 Burrard Street  
Vancouver, British Columbia, Canada V6C 0A3

604 631 3131 Telephone  
604 631 3232 Facsimile

**Deloitte & Touche LLP**  
2800 - 1055 Dunsmuir Street  
PO Box 49279  
Vancouver, BC V7X 1P4

October 13, 2015  
Invoice #: 951899  
GST #: 87937 6127 RT0003

Attention: Huey Lee

**REMITTANCE COPY**  
Please return with your payment

---

**Matter Number: 242587.00098**  
**Matter: Katzie Group of Companies**  
**Responsible Professional: K.M. Jackson**

**For Professional Services rendered through September 30, 2015 as described in the attached memorandum**

Total Fees	\$ 1,942.50
Total Taxes	233.11
<b>Total Amount Owing This Bill</b>	<b>CAD \$ 2,175.61</b>

**Tax Summary**

GST	97.13
BCPST	135.98
<b>Total Taxes Included in This Bill</b>	<b>233.11</b>

Accounts are due when rendered.

**VANCOUVER OFFICE BANKING DETAILS**

SCOTIABANK, 7<sup>th</sup> Floor, 409 Granville Street, Vancouver, BC V6C 1T2  
Account Name: Fasken Martineau DuMoulin LLP  
CAD Account No: 0142011265-12, Transit No.: 03020, Bank Code: 002  
SWIFT Code: NOSCCATT, ABA No.: 026002532

No. S144832  
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH  
COLUMBIA**

BETWEEN:

BANK OF MONTREAL

PETITIONER

AND:

KATZIE COAST MARINE SERVICES INC. et.al

RESPONDENTS

---

**AFFIDAVIT #1 OF KIBBEN JACKSON**

---

**FASKEN MARTINEAU DuMOULIN LLP**

Barristers and Solicitors  
2900 - 550 Burrard Street  
Vancouver, BC, V6C 0A3  
+1 604 631 3131

Counsel: Danielle Toigo  
Matter No: 242587.00098