

Clerk's stamp

CLERK OF THE COURT
FILED
MAY 25 2012
JUDICIAL CENTRE
OF CALGARY

COURT FILE NUMBER 1101-09473

COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

PLAINTIFF GERRY DUPAS

DEFENDANTS PHILLIP PINCUS, in his capacity as Trustee of the
PLATINUM INVESTMENT TRUST and PLATINUM
EQUITIES INC.

DOCUMENT AFFIDAVIT

ADDRESS FOR SERVICE AND CONTACT
INFORMATION OF PARTY FILING THIS
DOCUMENT



David Mann / Matthew Lindsay / Robert Kennedy
Fraser Milner Casgrain LLP
Bankers Court
15th Floor, 850 - 2nd Street S.W.
Calgary, Alberta T2P 0R8
Ph. (403) 268-7097 / 3037
Fax. (403) 268-3100

File No.: 545811-1

AFFIDAVIT OF ROBERT J. TAYLOR

Sworn on May 24, 2012

I, Robert J. Taylor, of the City of Calgary, Alberta, **MAKE OATH AND SAY THAT:**

1. I am a senior vice-president of Ernst & Young Inc., and as such, I have personal knowledge of the facts and matters hereinafter deposed to, except where stated to be based on information and belief, in which case I verily believe the same to be true.
2. This affidavit is sworn in addition and with reference to the Affidavits previously filed in this proceeding.

3. Ernst & Young Inc. was appointed as an inspector pursuant to a resolution (the "Resolution") of unitholders of the Platinum Investment Trust ("PIT") for the general purpose of reviewing the operations of PIT and the activities of the PIT trustees and administrators (the "Inspector"). Attached and marked as Exhibit "A" is a true copy of the Resolution made effective March 1, 2012 and passed by approximately 64 percent of the PIT unitholders.

4. I understand that the Resolution was passed as a result of a number of unsuccessful attempts by PIT investors to get information from PIT, including through orders sought in these proceedings. A summary of the numerous Court Orders, as they relate to the provision and disclosure of Information, can be summarized as follows:
 - (a) on July 27, 2011, the Court granted a consent order directing each of PIT, Shariff Chandran (the trustee of PIT), and Platinum Equity Inc. ("Platinum") to deliver information and documentation to Dupas in response to the original application ("Consent Order 1"). Attached and marked as Exhibit "B" is a true copy of Consent Order 1;

 - (b) on September 19, 2011, the Court granted an order directing that Chandran and Platinum comply with the terms of Consent Order 1 by September 22, 2011, and directed Chandran and Platinum to appear before the Court on September 26, 2011 to show cause why they should not be held in contempt of Court ("Order 2"). Attached and marked as Exhibit "C" is a true copy of Order 2;

 - (c) on September 26, 2011, the Court granted a consent order finding Chandran and Platinum in contempt of Court for failing to comply with Consent Order 1 and Order 2, and directed that Chandran and Platinum appear before the Court on October 5, 2011 to show cause why a court officer should not be appointed to access and review the Information ("Order 3"). Attached and marked as Exhibit "D" is a true copy of Order 3;

 - (d) on October 5, 2011, the Court granted an order appointing Grant Thornton LLP as Court officer ("Grant Thornton") for the purpose of, among other things, identifying, reviewing and reporting in relation to the Information ("Order 4"). Attached and marked as Exhibit "E" is a true copy of Order 4;

- (e) on October 20, 2012, the Court granted an order amending Order 4 to primarily deal with issues of privilege and relevance ("Consent Order 5"). Attached and marked as Exhibit "F" is a true copy of Order 5.
5. As contemplated by the terms of Order 4 (as amended by Consent Order 5), Grant Thornton prepared a form of report dated November 7, 2011 outlining their activities as Court officer (the "GT Report"). Attached and marked as Exhibit "G" is a true copy of the GT Report.

THE RESOLUTION

6. The duties of the Inspector pursuant to the Resolution included, but were not limited to, investigating and reporting to Dupas and the Investors in regard to the following:
- (a) the funds raised and received by the trustees, or any of them, from Investors in connection with PIT, including funds raised through or from participants in any Platinum Mortgage Investment Corporation ("PMIC");
 - (b) any and all accounting, reconciliations or other information maintained by the trustees or PIT in respect of funds raised from Investors (the "Investors' Funds");
 - (c) any use made of Investors' Funds by the trustees of PIT from time to time, including without limitation the review and inspection of all bank accounts or other investments held by PIT at any time;
 - (d) whether the Investors' Funds are secured against any property of any description and, if so, the particulars of the security and the collateral;
 - (e) whether the Investors' Funds are or were at any time segregated and applied to specific investments, or were comingled;
 - (f) the identification and status of all assets and liabilities of PIT as they presently exist or have existed in the past from the inception of PIT to date;
 - (g) the identification and reconciliation of any redemptions or other dispositions of PIT property from time to time from the inception of PIT to date;

- (h) the identification and reconciliation of any redemption of units in PIT or other payments; and
 - (i) the identification and status of any construction with respect to any properties associated with PIT, including permits obtained, contracts entered into and monies owing;
- (collectively, the "Inspector Duties").

7. In connection with the Inspector Duties, the Resolution also provided the following directions:
- (a) all current and former trustees and all current and former employees of PIT were directed to produce to the Inspector all property, documents and information requested by the Inspector in the course of the Inspector's investigations;
 - (b) all current and former trustees and all current and former employees of PIT were directed to allow the Inspector access to any premises containing information relevant to the Inspector's investigations, and the Inspector was authorized to enter into any such premises;
 - (c) the Inspector was authorized to make copies of any hard copy or electronic record, document or other information relating to his investigations; and
 - (d) all third parties who are providing, or who have provided at any time, professional or other services to PIT were directed to cooperate fully with the Inspector. Any privilege associated with any professional or advisory services provided to PIT or to the trustees acting in that capacity at any time were waived for the purpose of the Inspector's investigation and his reporting to the unitholders.
8. I was personally involved with attempting to carry out the Inspector Duties pursuant to the Resolution.
9. When I attended PIT on March 27, 2012, I was advised by Chandran and Chitra Chandran that they were having difficulty locating all the relevant materials and further indicated the PIT accounting was incomplete.
10. I was able to review limited materials which included:

- (a) fragments of the loan portfolio held by PIT (the "Loan Portfolio");
 - (b) some information regarding the status of loans;
 - (c) some bank statements for intermittent periods;
 - (d) some distribution statements;
 - (e) some unitholder subscriptions;
 - (f) a summary of the unitholders of PIT; and
 - (g) the PIT minute book.
11. The materials that were made available to me were limited, incomplete and inadequate in order to perform the Inspector's Duties.
12. In an effort to advance the mandate of the Inspector, I prepared a memorandum dated April 2, 2012 addressed to Chandran outlining the materials that would be required to effectively complete the Inspector's mandate under the Resolution (the "Memorandum"). To date, despite several follow up inquiries, I have not received any reply. Attached and marked as Exhibit "H" is a true copy of the Memorandum.
13. The Inspector is not able to perform the Inspector's Duties as mandated by the Resolution as a result of the lack of response and cooperation from the trustee of PIT.
14. In addition, I further note that a summary was prepared, based on the limited information that I reviewed, of my current understanding of the Loan Portfolio (the "Loan Summary"). At the time the Loan Summary was completed, I was unable to confirm and/or summarize the loan payments that have been made to PIT, the amount of interest earned by PIT, the current outstanding balances of each loan, the expected recovery and timing of recovery in respect of the amounts owed to PIT, and the actions taken by PIT to protect its interest in the outstanding loans. Attached and marked as Exhibit "I" is a true copy of the Loan Summary.
15. My initial review and findings as Inspector leads me to believe that:
- (a) much of the relevant Information is either missing or incomplete;

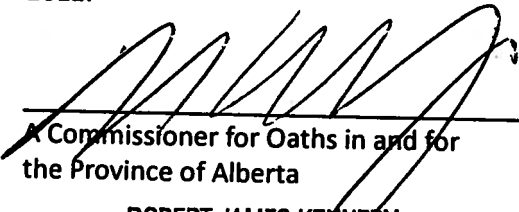
- (b) Chandran and Platinum are unlikely to reply to my memorandum or otherwise give me access to the Information;
 - (c) the Investors' Funds are not properly accounted for and, in some cases, appear to be comingled; and
 - (d) there is material credit risk in the value of PIT's loan portfolio, where amounts owed are not fully recoverable.
16. I reasonably believe that a fulsome review of the Information may reveal further "shortcomings" with respect to the apparent mismanagement of the Information and in the accounting of the Investors' Funds. I believe this is the reason why Chandran has not responded to my Memorandum.

ERNST & YOUNG INC. AS RECEIVER and MANAGER

17. Ernst & Young Inc. is prepared, subject to approval of this Honourable Court, to act as receiver and manager over the assets, undertakings and properties of PIT and Platinum (the "Receiver").
18. I do verily believe that:
- (a) the historical disregard by Chandran and Platinum to Court Orders, the requests of Dupas, the Investors, Grant Thornton and the failure to respond to the Inspector's Memorandum for the provision of the Information is causing prejudice and irreparable harm to the Investors altogether;
 - (b) it appears that PIT is understaffed and that Chandran is unable or unwilling to effectively and appropriately administer all aspects of the operations of PIT for the benefit of the Investors including, but not limited to, indentifying and monitoring the status and realization strategy of each outstanding loan held in the Loan Portfolio;
 - (c) the assets of PIT need to be identified and require protection and preservation; and
 - (d) the appointment of the Receiver is just and convenient in the circumstances.

19. This Affidavit is sworn in support of an application for an Order from this Honourable Court:
- (a) declaring that service of notice of this application and the supporting materials is validated and an Order abridging the time necessary for service of notice of this Application and/or any supporting materials, if necessary;
 - (b) appointing Ernst & Young Inc. as receiver and managers of the assets, undertakings and properties of PIT; and
 - (c) such further and other relief as this Honourable Court may deem just.

SWORN BEFORE ME at the City of Calgary, in)
the Province of Alberta, this 24th day of May,)
2012.)



A Commissioner for Oaths in and for)
the Province of Alberta)

ROBERT JAMES KENNEDY
Barrister and Solicitor



ROBERT J. TAYLOR

THIS IS EXHIBIT " A
referred to in the Affidavit of
Robert J. Taylor
Sworn before me this 21
Day of May, A.D. 2011
[Signature]
A COMMISSIONER FOR OATHS
IN AND FOR THE PROVINCE OF ALBERTA
ROBERT JAMES KENNEDY
Barrister and Solicitor

**RESOLUTION OF THE UNDERSIGNED UNITHOLDERS OF PLATINUM
INVESTMENT TRUST**

WHEREAS paragraph 12.9 of that certain Declaration of Trust dated April 25, 2008 creating the Platinum Investment Trust (the "Trust") directs that the Trustees shall call a meeting of Unitholders upon the written request of Unitholders holding in the aggregate not less than 25% of the Trust Units then outstanding for the purpose of considering the appointment of an inspector to investigate the performance by the Trustees of their responsibilities and duties in respect of the Trust;

AND WHEREAS paragraph 12.9 of that Declaration of Trust further directs that an inspector may be appointed for such purpose, at the expense of the Trust, at such meeting by a resolution approved by a majority of the votes cast at the meeting;

AND WHEREAS paragraph 12.11 of that Declaration of Trust directs that, notwithstanding any other provision of the Declaration of Trust, a resolution in writing executed by Unitholders holding a proportion of the outstanding Trust Units equal to the proportion required to vote in favour thereof at a meeting of the Unitholders to approve that resolution is valid as if it had been passed at a meeting of the Unitholders;

NOW THEREFORE BE IT RESOLVED THAT:

1. Robert Taylor of Ernst & Young Inc. (the "Inspector") be and is hereby appointed as inspector effective immediately to investigate the performance by all Trustees, past and present, of their responsibilities and duties in respect of the Trust.
2. All Trustees past and present are directed to cooperate fully and completely with the Inspector in carrying out his duties.
3. All employees of the Trust are directed to cooperate fully and completely with the Inspector in carrying out his duties.
4. Without in any way limiting the Inspector in the discharge of his appointment generally, the Inspector shall investigate and report to the Unitholders the following:
 - (a) the funds raised and received by the Trustees, or any of them, from anyone ("Investors") in connection with the Trust, including funds raised through or from participants in any Platinum Mortgage Investment Corporation ("PMIC");
 - (b) any and all accounting, reconciliations or other information maintained by the Trustees or the Trust in respect of funds raised from Investors (the "Investors' Funds");
 - (c) any use made of Investors Funds by the Trustees or the Trust from time to time, including without limitation the review and inspection of all bank accounts or other investments held by the Trust at any time;

- (d) whether the Investors' Funds are secured against any property of any description and, if so, the particulars of the security and the collateral;
- (e) whether the Investors' Funds are or were at any time segregated and applied to specific investments, or were comingled;
- (f) the identification and status of all assets and liabilities of the Trust as they presently exist or have existed in the past from the inception of the Trust to date;
- (g) the identification and reconciliation of any redemptions or other dispositions of Trust property from time to time from the inception of the Trust to date;
- (h) the identification and reconciliation of any redemption of units in the Trust or other payments; and
- (i) the identification and status of any construction with respect to any properties associated with the Trust, including permits obtained, contracts entered into and monies owing.

5. In connection with the appointment in paragraph 1:

- (a) all current and former Trustees and all current and former employees of the Trust are directed to produce to the Inspector all property, documents and information requested by the Inspector in the course of the Inspector's investigations;
- (b) all current and former Trustees and all current and former employees of the Trust are directed to allow the Inspector access to any premises containing information relevant to the Inspector's investigations, and the Inspector is hereby authorized to enter into any such premises;
- (c) the Inspector is authorized to make copies of any hard copy or electronic record, document or other information relating to his investigations; and
- (d) all third parties who are providing, or who have provided at any time, professional or other services to the Trust are hereby directed to cooperate fully with the Inspector. Any privilege associated with any professional or advisory services provided to the Trust or to the Trustees acting in that capacity at any time is hereby waived for the purpose of the Inspector's investigation and his reporting to the Unitholders.

6. Upon the conclusion of his investigation, the Inspector is directed to report his findings to the Unitholders, and may make interim reports to the Unitholders as he sees fit.

7. The fees, disbursements and costs of the Inspector and his employees and agents, including any legal fees he may incur in the discharge of his investigations, shall be paid promptly by the Trustees from Trust funds.

8. This Resolution may be executed in counterpart.

DATED effective this 1st day of March, 2012.

Sebastian Aninger	2,500	<i>S. J. Aninger</i>	<i>Viola Aninger</i>
Viola Aninger	2,500	<i>Viola Aninger</i>	<i>S. J. Aninger</i>
Karima Bawa	1,357		
Kevin Bloom	470		
Kevin Bloom	22,500		
Gregory Lyle Boutin	5,500		
Linda Boutin	2,500		
Hendrikus Bouwhuis	15,000		
Salim Datu	2,500		
Frederick Dekker	2,900		
Evelyn Dupas	4,000		
Gerald Dupas	15,900		
Alice Gardner	20,000		
Richard Green	2,500		
Yvonne Green	2,500		
Adam Helfrick	1,250		
Fredrick Helfrick	1,250		
Thomas James	1,200		
Donna Johnson	750		
Keith Johnson	750		

Thanks for copy of document I printed from the email Viola

8. This Resolution may be executed in counterpart.

DATED effective this 1st day of March, 2012.

Sebastian Aninger	2,500		
Viola Aninger	2,500		
Karima Bawa	1,357	<i>[Signature]</i>	<i>Keum Bhimani</i>
Kevin Bloom	470		
Kevin Bloom	22,500		
Gregory Lyle Boutin	5,500		
Linda Boutin	2,500		
Hendrikus Bouwhuis	15,000		
Salim Datu	2,500		
Frederick Dekker	2,900		
Evelyn Dupas	4,000		
Gerald Dupas	15,900		
Alice Gardner	20,000		
Richard Green	2,500		
Yvonne Green	2,500		
Adam Helfrick	1,250		
Fredrick Helfrick	1,250		
Thomas James	1,200		
Donna Johnson	750		
Keith Johnson	750		

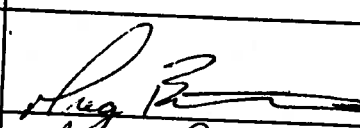
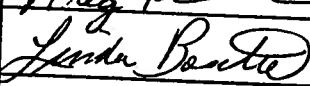
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DATED effective this 1st day of March, 2012.

Unit Holder	Trust Units	Signature	Witness
Sebastian Aninger	2,500		
Viola Aninger	2,500		
Karima Bawa	1,357		
Kevin Bloom	470	Kevin Bloom <i>KE</i>	<i>M. T. H.</i>
Kevin Bloom	22,500	Kevin Bloom <i>KE</i>	<i>M. T. H.</i>
Gregory Lyle Boutin	5,500		
Linda Boutin	2,500		
Hendrikus Bouwhuis	15,000		
Salim Datu	2,500		
Frederick Dekker	2,900		
Evelyn Dupas	4,000		
Gerald Dupas	15,900		
Alice Gardner	20,000		
Richard Green	2,500		
Yvonne Green	2,500		
Adam Helfrick	1,250		
Fredrick Helfrick	1,250		
Thomas James	1,200		
Donna Johnson	750		
Keith Johnson	750		

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Unit Holder	Trust Units	Signature	Witness
Sebastian Aninger	2,500		
Viola Aninger	2,500		
Karima Bawa	1,357		
Kevin Bloom	470		
Kevin Bloom	22,500		
Gregory Lyle Boutin	5,500		Patrick Angela Patrick
Linda Boutin	2,500		Patrick Angela Patrick
Hendrikus Bouwhuis	15,000		
Salim Datu	2,500		
Frederick Dekker	2,900		
Evelyn Dupas	4,000		
Gerald Dupas	15,900		
Alice Gardner	20,000		
Richard Green	2,500		
Yvonne Green	2,500		
Adam Helfrick	1,250		
Fredrick Helfrick	1,250		
Thomas James	1,200		
Donna Johnson	750		
Keith Johnson	750		

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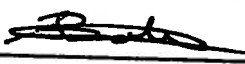
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Sebastian Aninger	2,500		
Viola Aninger	2,500		
Karima Bawa	1,357		
Kevin Bloom	470		
Kevin Bloom	22,500		
Gregory Lyle Boutin	5,500		
Linda Boutin	2,500		
Hendrikus Bouwhuis	15,000	<i>[Signature]</i> FOR I.P.S.	<i>[Signature]</i>
Salim Datu	2,500		
Frederick Dekker	2,900		
Evelyn Dupas	4,000		
Gerald Dupas	15,900		
Alice Gardner	20,000		
Richard Green	2,500		
Yvonne Green	2,500		
Adam Helfrick	1,250		
Fredrick Helfrick	1,250		
Thomas James	1,200		
Donna Johnson	750		
Keith Johnson	750		

DAVID A. RIDDELL
22311 - 119th Avenue
Maple Ridge, B.C. V2X 2Z2
Phone: 463-6281
SOLICITOR AND NOTARY PUBLIC

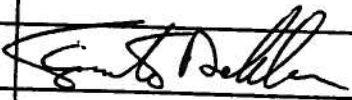
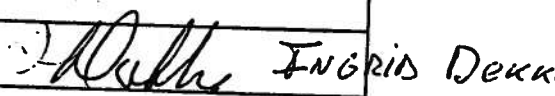
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Sebastian Aninger	2,500		
Viola Aninger	2,500		
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Salim Datu	2,500		Sheelina Datu
Frederick Dekker	2,900		
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Eveiy Dupas	4,000		
Geraid Dupas	15,900		
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Richard Green	2,500		
Yvonne Green	2,500		
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Linda Boutin	2,500		
Hendrikus Bouwhuis	15,000		
Salim Datu	2,500		
Frederick Dekker	2,900		
Evelyn Dupas	4,000		
Gerald Dupas	15,900	<i>Evelyn Dupas</i> <i>G.R. Dupas</i>	<i>Gerald Dupas</i> GERALD DUPAS. <i>Evelyn L. Dupas.</i> EVELYN L. DUPAS
Alice Gardner	20,000		
Richard Green	2,500		
Yvonne Green	2,500		
Adam Helfrick	1,250		
Fredrick Helfrick	1,250		
Thomas James	1,200		
Donna Johnson	750		
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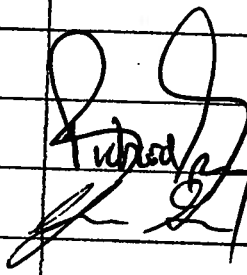
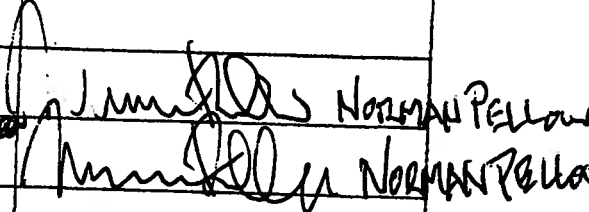
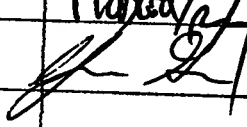
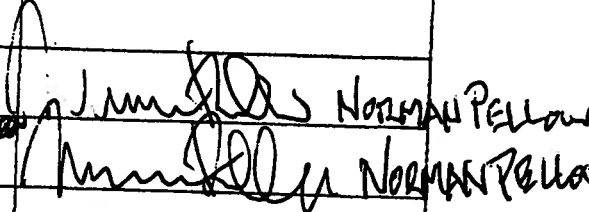
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Frederick Dekker	2,900		
Evelyn Dupas	4,000		
Gerald Dupas	15,900		
Alice Gardner	20,000	<i>Alice Gardner</i>	
Richard Green	2,500		
Yvonne Green	2,500		
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Unitholder	Trust Units	Signature	Witness
Sebastian Aninger	2,500		
Viola Aninger	2,500		
Karima Bawa	1,357		
Kevin Bloom	470		
Kevin Bloom	22,500		
Gregory Lyle Boutin	5,500		
Linda Boutin	2,500		
Hendrikus Bouwhuis	15,000		
Salim Datu	2,500		
Frederick Dekker	2,900		
Evelyn Dupas	4,000		
Gerald Dupas	15,900		
Alice Gardner	20,000		
Richard Green	2,500		
Yvonne Green	2,500		
Adam Helfrick	1,250		
Fredrick Helfrick	1,250		
Thomas James	1,200		
Donna Johnson	750		
Keith Johnson	750		

RICHARD GREEN

NORMAN PELLOW

NORMAN PELLOW

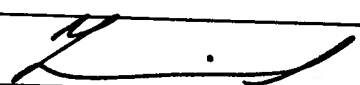
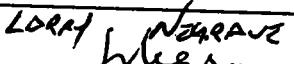
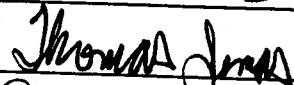
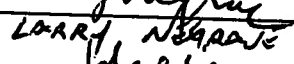
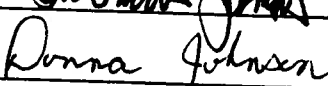
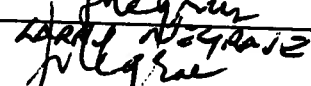
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DATED effective this 1st day of March, 2012.

NAME	SHARES	AMOUNT	
Sebastian Aninger	2,500		
Viola Aninger	2,500		
Karima Bawa	1,357		
Kevin Bloom	470		
Kevin Bloom	22,500		
Gregory Lyle Boutin	5,500		
Linda Boutin	2,500		
Hendrikus Bouwhuis	15,000		
Salim Datu	2,500		
Frederick Dekker	2,900		
Evelyn Dupas	4,000		
Gerald Dupas	15,900		
Alice Gardner	20,000		
Richard Green	2,500		
Yvonne Green	2,500		
Adam Helfrick	1,250	<i>Adam Helfrick</i>	<i>Michael Helfrick</i>
Fredrick Helfrick	1,250		
Thomas James	1,200		
Donna Johnson	750		
Keith Johnson	750		

8. This Resolution may be executed in counterpart.

DATED effective this 1st day of March, 2012.

Unitholder	Trust Units	Signature	Witness
Sebastian Aninger	2,500		
Viola Aninger	2,500		
Karima Bawa	1,357		
Kevin Bloom	470		
Kevin Bloom	22,500		
Gregory Lyle Boutin	5,500		
Linda Boutin	2,500		
Hendrikus Bouwhuis	15,000		
Salim Datu	2,500		
Frederick Dekker	2,900		
Evelyn Dupas	4,000		
Gerald Dupas	15,900		
Alice Gardner	20,000		
Richard Green	2,500		
Yvonne Green	2,500		
Adam Helfrick	1,250		
Fredrick Helfrick	1,250		LARRY NEGRAVE 
Thomas James	1,200		LARRY NEGRAVE 
Donna Johnson	750		LARRY NEGRAVE 
Keith Johnson	750		

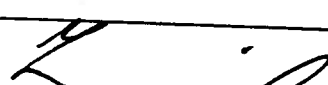
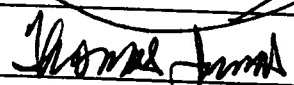
8. This Resolution may be executed in counterpart.

DATED effective this 1st day of March, 2012.

Unit/Owner	Trus. Units	Signature	Witness
Sebastian Aninger	2,500		
Viola Aninger	2,500		
Karima Bawa	1,357		
Kevin Bloom	470		
Kevin Bloom	22,500		
Gregory Lyle Boutin	5,500		
Linda Boutin	2,500		
Hendrikus Bouwhuis	15,000		
Salim Datu	2,500		
Frederick Dekker	2,900		
Evelyn Dupas	4,000		
Gerald Dupas	15,900		
Alice Gardner	20,000		
Richard Green	2,500		
Yvonne Green	2,500		
Adam Helfrick	1,250		
Fredrick Helfrick	1,250		
Thomas James	1,200		
Donna Johnson	750	<i>Donna Johnson</i>	<i>[Signature]</i>
Keith Johnson	750	<i>[Signature]</i>	<i>[Signature]</i>


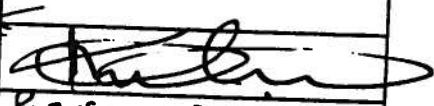
8. This Resolution may be executed in counterpart.

DATED effective this 1st day of March, 2012.

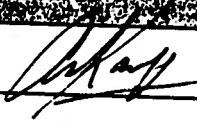
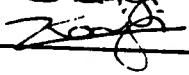
Unitholder	Trust Units	Signature	Witness
Sebastian Aninger	2,500		
Viola Aninger	2,500		
Karima Bawa	1,357		
Kevin Bloom	470		
Kevin Bloom	22,500		
Gregory Lyle Boutin	5,500		
Linda Boutin	2,500		
Hendrikus Bouwhuis	15,000		
Salim Datu	2,500		
Frederick Dekker	2,900		
Evelyn Dupas	4,000		
Gerald Dupas	15,900		
Alice Gardner	20,000		
Richard Green	2,500		
Yvonne Green	2,500		
Adam Helfrick	1,250		
Fredrick Helfrick	1,250		LARRY NEGRAVE J Mcgrane
Thomas James	1,200		LARRY NEGRAVE J Mcgrane
Donna Johnson	750	Donna Johnson	LARRY NEGRAVE J Mcgrane
Keith Johnson	750		

Unitholder	Trust Units	Signature	Witness
Anil Kanji	5,000		
Margaret Kern	4,850		
Ross Kern	4,850		
Imran Kotadia	1,221		
Naazim Kotadia	537		
Shaffiq Kotadia	12,358		
Shelina Kotadia	5,500		
Parviz Lalji	1,182		
Zulfikar Lalji	2,500		
Lewis Levin	2,500	<i>L. Levin</i>	Matthew Lindsay <i>[Signature]</i>
Maxine MacIntosh	5,720	<i>[Signature]</i>	LARRY NEGRAVE <i>[Signature]</i>
Gary MacIntosh	17,500	<i>[Signature]</i>	LARRY NEGRAVE <i>[Signature]</i>
Zaitun Mahedi	3,579		
Peter C. McGraw	500	<i>[Signature]</i>	LARRY NEGRAVE <i>[Signature]</i>
Sonia J. McGraw	2,100	<i>[Signature]</i>	<i>[Signature]</i> Keri Mitchell
Pooja Meda	2,400	<i>[Signature]</i>	LARRY NEGRAVE <i>[Signature]</i>
Helen Negrave	3,500	<i>[Signature]</i>	Reuben E. Huber A. G. Hee
Larry Negrave	2,500	<i>[Signature]</i>	Reuben E. Huber A. G. Hee
Gordon Newman	1,500		
Grace Newman	1,500		
Parviz Popat	1,412		
Gene Rassin	8,000	<i>[Signature]</i>	
Arash Shoarinejad	1,000		

Unit Holder	Trust Units	Signature	Witness
Anil Kanji	5,000		
Margaret Kern	4,850		
Ross Kern	4,850		
Imran Kotadia	1,221		
Naazim Kotadia	537		
Shaffiq Kotadia	12,358		
Shelina Kotadia	5,500		
Parviz Lalji	1,182		
Zulfikar Lalji	2,500		
Lewis Levin	2,500		
Maxine MacIntosh	5,720		
Gary MacIntosh	17,500		
Zaitun Mahedi	3,579		
Peter C. McGraw	500		
Sonia J. McGraw	2,100		
Pooja Meda	2,400		
Helen Negrave	3,500		
Larry Negrave	2,500		
Gordon Newman	1,500	<i>Gordon Newman</i>	<i>EVELYN M. GRANT</i>
Grace Newman	1,500	<i>Grace Newman</i>	<i>EVELYN M. GRANT</i>
Parviz Popat	1,412		<i>EVELYN M. GRANT</i>
Gene Rassin	8,000		
Arash Shoarinejad	1,000		

Anil Kanji	5,000		
Margaret Kern	4,850		
Ross Kern	4,850		
Imran Kotadia	1,221		
Naazim Kotadia	537		
Shaffiq Kotadia	12,358		
Shelina Kotadia	5,500		
Parviz Lalji	1,182		
Zulfikar Lalji	2,500		
Lewis Levin	2,500		
Maxine MacIntosh	5,720		
Gary MacIntosh	17,500		
Zaitun Mahedi	3,579		
Peter C. McGraw	500		
Sonia J. McGraw	2,100		
Pooja Meda	2,400		
Helen Negrave	3,500		
Larry Negrave	2,500		
Gordon Newman	1,500		
Grace Newman	1,500		
Parviz Popat	1,412		
Gene Rassin	8,000		PARVEZ M. AMLANI
Arash Shoarinejad	1,000		

Anil Kanji	5,000		
Margaret Kern	4,850		
Ross Kern	4,850		
Imran Kotadia	1,221		
Naazim Kotadia	537		
Shaffiq Kotadia	12,358		
Shellna Kotadia	5,500		
Parviz Lalji	1,182		
Zulfikar Lalji	2,500		
Lewis Levin	2,500		
Maxine MacIntosh	5,720		
Gary MacIntosh	17,500		
Zaitun Mahedi	3,579		
Peter C. McGraw	500		
Sonia J. McGraw	2,100		
Pooja Meda	2,400		
Helen Negrave	3,500		
Larry Negrave	2,500		
Gordon Newman	1,500		
Grace Newman	1,500		
Parviz Popat	1,412		
Gene Rassin	8,000		
Arash Shoarinejad	1,000	<i>low</i>	<i>Shafiqeh Sadraddini</i>

Name	Trust Units	Signature	Date
Anil Kanji	5,000		Zahra Kanji 
Margaret Kern	4,850		
Ross Kern	4,850		
Imran Kotadia	1,221		
Naazim Kotadia	537		
Shaffiq Kotadia	12,358		
Shelina Kotadia	5,500		
Parviz Lalji	1,182		
Zulfikar Lalji	2,500		
Lewis Levin	2,500		
Maxine MacIntosh	5,720		
Gary MacIntosh	17,500		
Zaitun Mahedi	3,579		
Peter C. McGraw	500		
Sonia J. McGraw	2,100		
Pooja Meda	2,400		
Helen Negrave	3,500		
Larry Negrave	2,500		
Gordon Newman	1,500		
Grace Newman	1,500		
Parviz Popat	1,412		
Gene Rassin	8,000		
Arash Shoarinejad	1,000		

Anil Kanji	5,000		
Margaret Kern	4,850	<i>Margaret Kern</i>	<i>Dublo</i>
Ross Kern	4,850	<i>1... Kern</i>	<i>Laura Dublanko</i>
Imran Kotadia	1,221		<i>Dublo</i>
Naazim Kotadia	537		
Shaffiq Kotadia	12,358		
Shelina Kotadia	5,500		
Parviz Lalji	1,182		
Zulfikar Lalji	2,500		
Lewis Levin	2,500		
Maxine MacIntosh	5,720		
Gary MacIntosh	17,500		
Zaitun Mahedi	3,579		
Peter C. McGraw	500		
Sonia J. McGraw	2,100		
Pooja Meda	2,400		
Helen Negrave	3,500		
Larry Negrave	2,500		
Gordon Newman	1,500		
Grace Newman	1,500		
Parviz Popat	1,412		
Gene Rassin	8,000		
Arash Shoarinejad	1,000		

Unit Holder	Trust Units	Signature	Witness
Anil Kanji	5,000		
Margaret Kern	4,850		
Ross Kern	4,850		
Imran Kotadia	1,221	<i>Imran Kotadia</i>	JL Jim Leung JIM LAUNG
Naazim Kotadia	537	<i>Naazim Kotadia</i>	JL Jim Leung JIM LAUNG
Shaffiq Kotadia	12,358	<i>Shaffiq Kotadia</i>	JL Jim Leung JIM LAUNG
Shelina Kotadia	5,500	<i>Shelina Kotadia</i>	JL Jim Leung JIM LAUNG
Parviz Lalji	1,182		
Zulfikar Lalji	2,500		
Lewis Levin	2,500		
Maxine MacIntosh	5,720		
Gary MacIntosh	17,500		
Zaitun Mahedi	3,579		
Peter C. McGraw	500		
Sonia J. McGraw	2,100		
Pooja Meda	2,400		
Helen Negrave	3,500		
Larry Negrave	2,500		
Gordon Newman	1,500		
Grace Newman	1,500		
Parviz Popat	1,412		
Gene Rassin	8,000		
Arash Shoarinejad	1,000		

Anil Kanji	5,000		
Margaret Kern	4,850		
Ross Kern	4,850		
Imran Kotadia	1,221		
Naazim Kotadia	537		
Shaffiq Kotadia	12,358		
Shellina Kotadia	5,500		
Parviz Lalji	1,182		
Zulfikar Lalji	2,500		
Lewis Levin	2,500		
Maxine Macintosh	5,720		

Witness: Akbar Hirji

A. Hirji

March 25, 2012

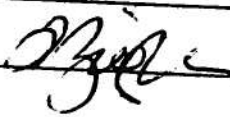

Unit Holder	Trust Unit	Signature	Unit
Anil Kanji	5,000		
Margaret Kern	4,850		
Ross Kern	4,850		
Imran Kotadia	1,221		
Naazim Kotadia	537		
Shaffiq Kotadia	12,358		
Shelina Kotadia	5,500		
Parviz Lalji	1,182		
Zulfikar Lalji	2,500		
Lewis Levin	2,500		
Maxine MacIntosh	5,720		
Gary MacIntosh	17,500		
Zaitun Mahedi	3,579	⊗ <i>Z. Mahedi</i>	<i>M. Mahedi</i>
Peter C. McGraw	500		
Sonia J. McGraw	2,100		
Pooja Meda	2,400		
Helen Negrave	3,500		
Larry Negrave	2,500		
Gordon Newman	1,500		
Grace Newman	1,500		
Parviz Popat	1,412		
Gene Rassin	8,000		
Arash Shoarinejad	1,000		

Unitholder	Trust Units	Signature	Witness
George Shopland	4,000		
Yuming Wang	2,700		
Anita Lynn Weiss	1,200	<i>A Weiss</i>	<i>J Negre</i>
Teresa Ziegler	1,500		<i>Lynn Negre</i>

Unit holder	Trust Units	Signature	Witness
George Shopland	4,000	<i>George Shopland</i>	<i>Diane Trunson</i>
Yuming Wang	2,700		
Anita Lynn Weiss	1,200		
Teresa Ziegler	1,500		

Unit Holder	Trust Units	Signature	Witness
George Shopland	4,000		
Yuming Wang	2,700	<i>Yuming Wang</i>	Chengfu Yao
Anita Lynn Weiss	1,200		
Teresa Ziegler	1,500		

Unitholder	Trust Units	Signature	Witness
George Shopland	4,000		
Yuming Wang	2,700		
Anita Lynn Weiss	1,200	<i>A Weiss</i>	<i>Isabel Weis</i> <i>Wang</i>
Teresa Ziegler	1,500		

Unit Holder	Trust Units	Signature	Witness
George Shopland	4,000		
Yuming Wang	2,700		
Anita Lynn Weiss	1,200		
Teresa Ziegler	1,500		

Clerk's stamp:

CLERK OF THE COURT
FILED
JUL 27 2011
JUDICIAL CENTRE
OF CALGARY

COURT FILE NUMBER

1101-09473

COURT OF QUEEN'S BENCH OF ALBERTA

CALGARY

JUDICIAL CENTRE

GERRY DUPAS

APPLICANT THIS IS EXHIBIT " B " referred to in the Affidavit of

RESPONDENT ROBERT J. TAYLOR Sworn before me this 24 Day of MAY A.D. 2011

PHILLIP PINCUS, in his capacity as Trustee of the PLATINUM INVESTMENT TRUST and PLATINUM EQUITIES INC.

DOCUMENT A COMMISSIONER FOR OATHS AND FOR THE PROVINCE OF ALBERTA ROBERT JAMES KENNEDY Barrister and Solicitor

CONSENT ORDER



ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

Matthew R. Lindsay/Jordan R.M. Deering
Fraser Milner Casgrain LLP
Bankers Court
15th Floor, 850 - 2nd Street S.W.
Calgary, Alberta T2P 0R8
Ph. (403) 268-3037/3110 Fx. (403) 268-3100
File No.: 510234-36

DATE ON WHICH ORDER WAS PRONOUNCED: July 27, 2011

LOCATION WHERE ORDER WAS PRONOUNCED: Calgary, Alberta

NAME OF MASTER/JUDGE WHO MADE THIS ORDER: The Honourable Justice J. Poelman

CONSENT ORDER

UPON the application of the Applicant, Gerry Dupas; AND UPON having read the Affidavit of the Applicant sworn July 5, 2011 and the Affidavit of Larry Negrave sworn July 5, 2011 and the Affidavits of Service of Larry Robson sworn July 13, 2011; AND UPON hearing Counsel for the Applicant; AND UPON

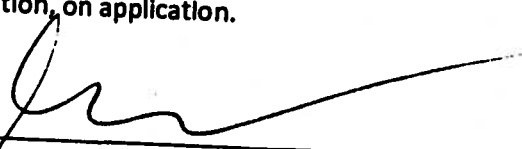
NOTING THE CONSENT of Counsel for Platinum Investment Trust, Shariff Chandran and Platinum Equities Inc.;

IT IS HEREBY ORDERED THAT:

1. This application is adjourned *sine die* as against the Respondent, Phillip Pincus.
2. Each of Platinum Investment Trust, Shariff Chandran and Platinum Equities Inc. shall deliver the following information and documentation to the Applicant through the Applicant's counsel on or before 4:00 pm on Wednesday, August 31, 2011, namely:
 - (a) Confirmation whether or not the Respondent, Phillip Pincus, remains the Trustee of the Platinum Investment Trust;
 - (b) If the Respondents, or either of them, say that Phillip Pincus is no longer the Trustee of the Platinum Investment Trust, then provide the identity of the current Trustee(s), the last known address for the Trustee(s), the date on which Phillip Pincus ceased to be Trustee and copies of any resolutions appointing the Trustee(s);
 - (c) Advise whether any annual meetings of Unit Holders of the Platinum Investment Trust have been held pursuant to paragraph 12.1 of the Declaration of Trust, together with copies of any minutes, agendas or resolutions associated with any such meetings;
 - (d) Provide a complete copy of the full register of Unit Holders of the Platinum Investment Trust setting out the following:
 - (i) the name and address of each Unit Holder;
 - (ii) the number of Trust Units held by each Unit Holder;
 - (iii) the certificate numbers held by each Unit Holder; and
 - (iv) confirmation of any transfers or redemptions of any Units.
 - (e) Provide copies of all financial statements prepared by or on behalf of the Platinum Investment Trust, including but not limited to any annual review engagement financial statements, comparative financial statements for each year and the review report of the chartered accountant who prepared them; and

(f) Provide a detailed listing of each of the investments, mortgages or other instruments held from time to time by the Platinum Investment Trust, including the current inventory of such investments, mortgages or other instruments of any description together with the details of any redemption or other dispositions of any of those mortgages, investments or instruments.

3. Costs of this application may be spoken to in the litigation, on application.




J.C.Q.B.A.

CONSENTED TO THIS 26th day of July, 2011

BENNETT JONES LLP

Per: _____


Farouk Adatia
Solicitors for Platinum Investment Trust,
Shariff Chandran and Platinum Equities
Inc.

Clerk's stamp:

CLERK OF THE COURT
FILED
SEP 19 2011
JUDICIAL CENTRE
OF CALGARY

COURT FILE NUMBER

1101-09473

COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE

CALGARY

APPLICANT

GERRY DUPAS

RESPONDENT

THIS IS EXHIBIT "C"
referred to in the Affidavit of
ROBERT J. TONKAY
Sworn before me this 24
Day of MAY, A.D. 2012

PHILLIP PINCUS, in his capacity as Trustee of the
PLATINUM INVESTMENT TRUST and PLATINUM
EQUITIES INC.

DOCUMENT

ORDER

A COMMISSIONER FOR OATHS
AND FOR THE PROVINCE OF ALBERTA

ROBERT JAMES KENNEDY
Barrister and Solicitor



ADDRESS FOR SERVICE AND CONTACT
INFORMATION OF PARTY FILING THIS
DOCUMENT

Matthew R. Lindsay/Jordan R.M. Deering
Fraser Milner Casgrain LLP
Bankers Court
15th Floor, 850 - 2nd Street S.W.
Calgary, Alberta T2P 0R8
Ph. (403) 268-3037/3110 Fx. (403) 268-3100
File No.: 510234-36

DATE ON WHICH ORDER WAS PRONOUNCED:

September 19, 2011

LOCATION WHERE ORDER WAS PRONOUNCED:

Calgary, Alberta

NAME OF MASTER/JUDGE WHO MADE
THIS ORDER:

The Honourable Justice S.M. Bensler

ORDER

UPON the application of the Applicant, Gerry Dupas; AND UPON having read the Affidavits of the Applicant sworn July 5, 2011 and September 14, 2011 and the Affidavit of Larry Negrave sworn July 5, 2011 and the Consent Order in this Action dated July 27, 2011; AND UPON hearing Counsel for the Applicant;

IT IS HEREBY ORDERED THAT:

1. Time for service of notice of this application is hereby abridged to the time actually given.
2. The Respondents, Shariff Chandran and Platinum Equities Inc., shall and are hereby directed to comply in all respects with the Consent Order on or before 4:00 pm Calgary time on Thursday, September 22, 2011.
3. The Respondents, Shariff Chandran and Platinum Equities Inc., are hereby directed to appear before the presiding Justice in Chambers on Monday, September 26, 2011 at 10:00 am to show cause why they should not be held in contempt of this Court.
4. Costs of this application may be spoken to on Monday, September 26, 2011.

"S.M. Bensler"
J.C.Q.B.A.

Clerk's stamp:

COURT FILE NUMBER

1101-09473

COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE

CALGARY

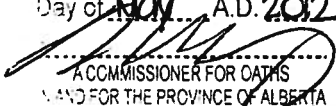
APPLICANT

GERRY DUPAS

RESPONDENT

PHILLIP PINCUS, in his capacity as Trustee of the
PLATINUM INVESTMENT TRUST and PLATINUM
EQUITIES INC.

DOCUMENT

THIS IS EXHIBIT " D " referred to in the Affidavit of
Robert J. Taylor
Sworn before me this 24
Day of NOV. A.D. 2011

A COMMISSIONER FOR OATHS
AND FOR THE PROVINCE OF ALBERTA
ROBERT JAMES KENNEDY
Barrister and Solicitor

CLERK OF THE COURT
FILED
SEP 27 2011
JUDICIAL CENTRE
OF CALGARY

ORDER



ADDRESS FOR SERVICE AND CONTACT
INFORMATION OF PARTY FILING THIS
DOCUMENT

Matthew R. Lindsay/Jordan R.M. Deering
Fraser Milner Casgrain LLP
Bankers Court
15th Floor, 850 - 2nd Street S.W.
Calgary, Alberta T2P 0R8
Ph. (403) 268-3037/3110 Fx. (403) 268-3100
File No.: 545811-1

DATE ON WHICH ORDER WAS PRONOUNCED:

September 26, 2011

LOCATION WHERE ORDER WAS PRONOUNCED:

Calgary, Alberta

NAME OF MASTER/JUDGE WHO MADE
THIS ORDER:

The Honourable Justice W.A. Tilleman

ORDER

UPON the application of the Applicant, Gerry Dupas; AND UPON having read the Affidavits of the Applicant sworn July 5, 2011 and September 14, 2011, the Affidavit of Larry Negrave sworn July 5, 2011, the Affidavit of Lori Mitchell sworn September 26, 2011, the Consent Order in this Action dated

July 27, 2011 and the Order herein dated September 19, 2011; AND UPON hearing Counsel for the Applicant and the Respondents Platinum Equities Inc. and Shariff Chandran:

IT IS HEREBY ORDERED THAT:

1. The Respondents, Shariff Chandran and Platinum Equities Inc., have failed to comply with paragraph 2(f) of the Consent Order of Justice Poelman dated July 27, 2011 and have not demonstrated any reasonable excuse for their failure. As a result, both Platinum Equities Inc. and Shariff Chandran are in contempt of this Court and are directed to take all steps necessary to purge that contempt.
2. The Respondents, Shariff Chandran and Platinum Equities Inc., are hereby directed to appear before the presiding Justice in Chambers on Wednesday, October 5, 2011 at 10:00 am to show cause why a Court officer should not be appointed to access and review the relevant information and provide it to the Applicants at the Respondents' cost, together with any other remedy that may be appropriate in the circumstances.
3. Platinum Equities Inc. and Shariff Chandran shall, jointly and severally, pay costs of \$2,000 to the Applicant in care of his counsel, forthwith and in any event of the cause. For the sake of clarity, this award of costs is only for the Applicant's appearance on September 26, 2011 and is made without prejudice to the Applicant's ability to seek additional costs or any other remedy on return of the matter on October 5, 2011.
4. This Order may be approved in counterpart and by facsimile or electronic means.



J.C.Q.B.A.

APPROVED as form and content this 26th day
of September, 2011.

Sheena Owens
Bennett Jones LLP
Counsel for Platinum Equities Inc, Platinum
Investment Trust and Shariff Chandran

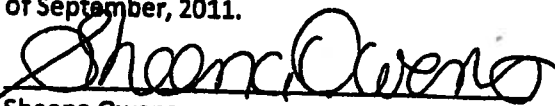
July 27, 2011 and the Order herein dated September 19, 2011; AND UPON hearing Counsel for the Applicant and the Respondents Platinum Equities Inc. and Shariff Chandran:

IT IS HEREBY ORDERED THAT:

1. The Respondents, Shariff Chandran and Platinum Equities Inc., have failed to comply with paragraph 2(f) of the Consent Order of Justice Poelman dated July 27, 2011 and have not demonstrated any reasonable excuse for their failure. As a result, both Platinum Equities Inc. and Shariff Chandran are in contempt of this Court and are directed to take all steps necessary to purge that contempt.
2. The Respondents, Shariff Chandran and Platinum Equities Inc., are hereby directed to appear before the presiding Justice in Chambers on Wednesday, October 5, 2011 at 10:00 am to show cause why a Court officer should not be appointed to access and review the relevant information and provide it to the Applicants at the Respondents' cost, together with any other remedy that may be appropriate in the circumstances.
3. Platinum Equities Inc. and Shariff Chandran shall, jointly and severally, pay costs of \$2,000 to the Applicant in care of his counsel, forthwith and in any event of the cause. For the sake of clarity, this award of costs is only for the Applicant's appearance on September 26, 2011 and is made without prejudice to the Applicant's ability to seek additional costs or any other remedy on return of the matter on October 5, 2011.
4. This Order may be approved in counterpart and by facsimile or electronic means.

J.C.Q.B.A.

APPROVED as form and content this 26th day
of September, 2011.

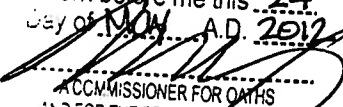

Sheena Owens
Bennett Jones LLP
Counsel for Platinum Equities Inc, Platinum
Investment Trust and Shariff Chandran

COURT FILE NUMBER
COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE
APPLICANT

1101-09473
CALGARY

Clerk's stamp:
**CLERK OF THE COURT
FILED
OCT 05 2011
JUDICIAL CENTRE
OF CALGARY**

RESPONDENT
DOCUMENT

"THIS IS EXHIBIT " E "
referred to in the Affidavit of
Robert J. Taylor
Sworn before me this 24
day of NOV A.D. 2012

COMMISSIONER FOR OATHS
AND FOR THE PROVINCE OF ALBERTA
ROBERT JAMES KENNEDY
Barrister and Solicitor

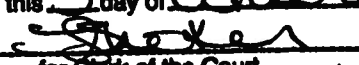
GERRY DUPAS
PHILLIP PINCUS, In his capacity as Trustee of the
PLATINUM INVESTMENT TRUST and PLATINUM
EQUITIES INC.

ORDER



ADDRESS FOR SERVICE AND CONTACT
INFORMATION OF PARTY FILING THIS
DOCUMENT

Matthew R. Lindsay/Jordan R.M. Deering
Fraser Milner Casgrain LLP
Bankers Court
15th Floor, 850 - 2nd Street S.W.
Calgary, Alberta T2P 0R8
Ph. (403) 268-3037/3110 Fx. (403) 268-3100
File No.: 510234-36

I hereby certify this to be a true copy of
the original order
Dated this 5 day of October 2011

for Clerk of the Court

DATE ON WHICH ORDER WAS PRONOUNCED: October 5, 2011

LOCATION WHERE ORDER WAS PRONOUNCED: Calgary, Alberta

NAME OF MASTER/JUDGE WHO MADE THIS ORDER: The Honourable Justice Sulatycky

ORDER

UPON the application of the Applicant, Gerry Dupas; AND UPON having read the Affidavits of the Applicant sworn July 5, 2011 and September 14, 2011, the Affidavit of Larry Negrave sworn July 5, 2011, the Affidavit of Lori Mitchell sworn September 26, 2011, the Consent Order in this Action dated

July 27, 2011 and the Order herein dated September 19, 2011; AND UPON hearing Counsel for the Applicant and the Respondents Platinum Equities Inc. and Shariff Chandran:

IT IS HEREBY ORDERED THAT:

1. The Respondents, Shariff Chandran and Platinum Equities Inc., have failed to comply with paragraph 2(f) of the Consent Order of Justice Poelman dated July 27, 2011, the Order of Justice Bensler dated September 19, 2011 and the Order of Justice Tilleman dated September 26, 2011 and have not demonstrated any reasonable excuse for their failure.
2. Grant Thornton LLP is hereby appointed as this Court's officer for the purpose of entering into the business premises of Platinum Equities Inc. and Shariff Chandran, wherever situated, to identify and make copies of all paper and electronic records in the possession of Platinum Investment Trust, Platinum Equities Inc. or Shariff Chandran associated with the investments, mortgages or other instruments held from time to time by the Platinum Investment Trust, including but not limited to the current inventory of such investments, mortgages or other instruments of any description together with all information and details of any redemption or other dispositions of those mortgages, investments or instruments at any time.
3. Platinum Investment Trust, Platinum Equities Inc., Shariff Chandran and anyone employed in the business carried on from those premises or otherwise associated with the business of Platinum Equities Inc. shall, and are hereby directed to, cooperate fully with the Court's officer in the execution of these duties, including without limitation granting access to the premises, identifying and giving access to all records and information described in paragraph 2 above and permitting and facilitating the copying and removal of that information from the premises.
4. The Court's officer is directed to report on the records and information obtained, and that report shall be provided to counsel for the Applicant and counsel for the Respondents. The report shall be made in a timely manner and shall provide to the Applicants copies of all relevant materials identified and obtained by the Court officer.
5. The Court's officer shall be at liberty to seek any directions that may be required in the fulfillment of its mandate from this Court on notice to both the Applicant and the Respondents.

6. The Respondents shall, jointly and severally, bear all professional fees, costs and expenses of the Court officer's actions as directed hereunder or as directed from time to time.
7. The Respondents shall, jointly and severally, forthwith and in any event of the cause, pay additional costs of \$ 1,000⁰⁰ ^{"ABS"} to the Applicant.
8. Gerry Dupas is hereby awarded Judgment in the sum of \$ 3,000.00 ^{"ABS"} against Platinum Investment Trust, Platinum Equities Inc. and Shariff Chandran, jointly and severally. Judgment in that amount is awarded with respect to costs of this Action to date, and without prejudice to any other remedies of any kind to which the Applicant may be entitled.

A.B. Sulatycky
J.C.Q.B.A.

I hereby certify this to be a true copy of
the original Order
Dated this 24 day of October
Robert J. Taylor
for Clerk of the Court

Clerk's stamp:

CLERK OF THE COURT
(FILED)
OCT 24 2011
JUDICIAL CENTRE
OF CALGARY

COURT FILE NUMBER 1101-09473
COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY
APPLICANT GERRY DUPAS

RESPONDENTS PHILLIP PINCUS, in his capacity as Trustee of the
PLATINUM INVESTMENT TRUST and PLATINUM
EQUITIES INC.

DOCUMENT
EXHIBIT " F " referred to in the Affidavit of
Robert J. Taylor
Sworn before me this 24
Day of Nov A.D. 2011
A COMMISSIONER FOR OATHS
ROBERT JAMES KENNEDY
Barrister and Solicitor
CONSENT ORDER



ADDRESS FOR SERVICE AND CONTACT
INFORMATION OF PARTY FILING THIS
DOCUMENT

Matthew R. Lindsay/Jordan R.M. Deering
Fraser Milner Casgrain LLP
Bankers Court
15th Floor, 850 - 2nd Street S.W.
Calgary, Alberta T2P 0R8
Ph. (403) 268-3037/3110 Fx. (403) 268-3100
File No.: 510234-36

DATE ON WHICH ORDER WAS PRONOUNCED: October 20, 2011

LOCATION WHERE ORDER WAS PRONOUNCED: Calgary, Alberta

NAME OF MASTER/JUDGE WHO MADE THIS ORDER: The Honourable Justice A. B. Sulatycky

CONSENT ORDER

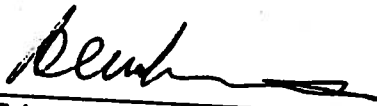
UPON the application of the Applicant, Gerry Dupas; AND UPON having read the Affidavits of the Applicant sworn July 5, 2011 and September 14, 2011, the Affidavit of Larry Negrave sworn July 5, 2011, the Affidavit of Lori Mitchell sworn September 26, 2011, the Consent Order in this Action dated

July 27, 2011 and the Orders herein dated September 19, 2011 and October 5, 2011; AND UPON hearing Counsel for the Applicant, Gerry Dupas, and Counsel for the Respondents, Platinum Investment Trust, Platinum Equities Inc. and Shariff Chandran; AND UPON NOTING the consent of the parties:

IT IS HEREBY ORDERED THAT:

1. Grant Thornton LLP, in its capacity as Court officer appointed pursuant to the Order of October 5, 2011 is hereby directed as follows:
 - (a) Not to access the imaged hard drive in its possession, pursuant to its execution of the within Order of October 5, 2011, pending further direction of this Court or the joint written direction of counsel for the Applicant and counsel for the Respondents;
 - (b) To provide reasonable access to the imaged hard copy documents obtained from the Platinum Equities Inc. and Platinum Investment Trust business premises to counsel for the Respondent so that they may be reviewed for privilege and relevance; and
 - (c) To refrain from issuing its initial report in respect of the imaged hard copy documents until after October 28, 2011.
2. Counsel for the Respondents shall review the above noted hard copy document images for relevance and privilege on or before the close of business on October 28, 2011.
3. If any claims of privilege or irrelevance are asserted, they shall be communicated to Grant Thornton LLP and counsel for the Applicants, together with a reasonable explanation for the privilege or irrelevance claims, on or before the close of business on October 28, 2011.

4. If any claims of privilege or irrelevance are made, the documents subject to those claims shall not be included in Grant Thornton LLP's initial report. Any such claims will be adjudicated by this Court on November 3, 2011, at 1:00 p.m. *ADA*.
5. Grant Thornton LLP shall propose a protocol for the review of the imaged hard drive and will publish that protocol to counsel for the Applicants and counsel for the Respondents on or before October 2⁹, 2011. *3 ADA*.
6. In the event that counsel cannot agree on a protocol for the review of the hard drive, further directions may be sought from this Court on November 3, 2011, at 1:00 p.m. *ADA*.
7. Costs of this Order may be spoken to on November 3, 2011 or at such later date as this Honourable Court deems appropriate.

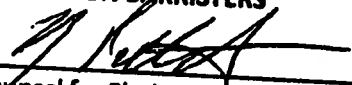


J.C.Q.B.A.

CONSENTED TO this 19 day of October, 2011

BILLINGTON BARRISTERS

Per:



Counsel for Platinum Equities Inc.,
Platinum Investment Trust and Shariff
Chandran



**Privileged and Confidential
Prepared to Advise Counsel**

**Mr. Matthew R. Lindsay
Fraser Milner Casgrain LLP
Barristers and Solicitors
15th Floor, Bankers Court
850 - 2nd Street SW
Calgary Alberta T2P 0R8**

**Mr. Ryan P. Pelletier
Billington Barristers
#1910 Elveden House
717 - 7th Avenue S.W.
Calgary, Alberta T2P 0Z3**

THIS IS EXHIBIT " G " referred to in the Affidavit of Robert J. Taylor Sworn before me this 24 Day of MAY A.D. 2012
A COMMISSIONER FOR OATHS IN AND FOR THE PROVINCE OF ALBERTA
ROBERT JAMES KENNEDY
Barrister and Solicitor

**Grant Thornton LLP
Suite 900
833 - 4th Avenue SW
Calgary, AB
T2P 3T5
T +1 403 280 2500
F +1 403 280 2571
www.GrantThornton.ca**

November 7, 2011

**RE: PLATINUM INVESTMENT TRUST, PLATINUM EQUITIES INC.
AND SHARIFF CHANDRAN**

Dear Mr. Lindsay and Mr. Pelletier,

Further to the Consent Orders dated October 5, 2011 (the "October 5th Order") and October 20, 2011 (the October 20th Order) granted by the Honourable Justice Sulatycky regarding the above noted matter, and taking into consideration our letter dated October 27, 2011 and the letter dated November 1, 2011 from Mr. Pelletier of Barrington Barristers, we are pleased to provide our report.

Pursuant to the October 5th Order, members of Grant Thornton LLP arrived at the offices of Platinum Equities Inc. ("PE")/Platinum Investment Trust ("PIT") on October 6, 2011 at approximately 10:30 am. We were met by Chitra Chandran who provided us with a brief tour of the premises which was in disarray due to construction underway to renovate and downsize the offices. This disruption caused the books and records of PIT to be intermingled with PE and other related companies in boxes and file cabinets in two separate locations.

Ms. Chandran indicated that while she had seen the October 5th Order, she had not read it; therefore, we went through it in some detail to ensure that she had an understanding of what it said. Ms. Chandran provided us with the following information:

- Ms. Chandran, who is the sister of Shariff Chandran, is currently in charge of Investor Relations for PIT;
- We were informed that Shariff Chandran was in meetings and would not be available to meet with us;

- Ms. Chandran indicated that she was the most senior person available and we could deal directly with her;
- Ms. Chandran stated that PIT is not currently being “run” by anyone nor did she know a lot about the company;
- Ms. Chandran indicated that most employees and contractors had recently been laid off and there was no accounting or computer staff who could assist us; and
- We discussed the records we wished to obtain copies of, including electronic records and Ms. Chandran seemed to think that most of the financial records were kept on paper but she did not appear to know what was kept or where any records were located.

Based on the foregoing, especially the apparent lack of knowledge by Ms. Chandran regarding the PIT business records and not having any other PIT or PE representative available to assist or direct us, we decided that the most efficient and effective approach to carry out the Consent Order would be to:

- 1 Obtain copies, in electronic form, of hard copy documents in boxes and/or file folders described as related to PIT; and
- 2 Obtain electronic images of the PE/PIT server and other workstation computers.

We discussed the above with Ms. Chandran who raised no objection and directed us to the hard copy records and provided us with a key to the server room. Grant Thornton staff then began identifying and copying PIT records as described above, both hard copy and electronic, which took place over October 6, 7 and 11, 2011.

On the afternoon of October 6, 2011, counsel for the Applicant and counsel for the Respondent contacted Grant Thornton regarding two issues:

- 1 Because Grant Thornton was obtaining an electronic image of the PE/PIT server, the information obtained would extend beyond that contemplated by the Consent Order (i.e. it would contain information regarding PE and other related and perhaps unrelated entities). It was agreed by all parties that we would proceed with the acquisition process but the data obtained from the server would be sealed and not reviewed or otherwise disclosed until our report had been provided to the Court; and
- 2 Counsel for the Applicant had been advised by counsel for the Respondent that there were no records related to PIT at Mr. Chandran’s personal residence or on his personal computer. This was consistent with the information we had received earlier from Ms Chandran. Therefore, while the Order contemplated a review of Mr. Chandran’s personal residence, it was agreed by all parties that this was not necessary and would not take place at this time.

As described in the October 20th Order, we provided counsel for the Respondent with a CD of the scanned hard copy documents on October 19, 2011 and provided counsel for the Applicants and counsel for the Respondent with a protocol to review the imaged hard drives in our letter dated October 27, 2011.

In his letter dated November 1, 2011, counsel for the Respondent provided a detailed list of scanned hard copy documents which his client believed were irrelevant or privileged. We have removed these documents from the original set of documents and provided the remaining documents to counsel for the Applicant with a copy of this letter.

Also in his letter of November 1, 2011, counsel for the Respondent completely rejected our proposal to review the imaged hard drives described in our letter dated October 27, 2011. The letter goes on to request a new proposal suggesting that we avail ourselves of paragraph 3 of the October 5th Order and "seek the cooperation of Mr. Chandran and the employees of Platinum Equities Inc. in identifying the relevant documents on the imaged servers." While we are prepared to undertake such an exercise, we would like to point out that this was the approach we had intended to take when we first arrived at the premises of PE/PIT on October 6, 2011 but, as described above, were informed that Mr. Chandran was not available to us nor was there any employee of PE/PIT, other than Ms Chandran who had very limited knowledge of the company, who could assist us.

As agreed, we have also enclosed a statement of our account to date regarding this matter.

Please contact us at your convenience should you have any questions or require further clarification regarding any of the above.

Yours truly,

Grant Thornton LLP



David J. Elzinga, CA-IFA, CFE
Partner¹

/s/

Enclosures: Invoice to both parties
CD of relevant documents to Mr. Lindsay

¹A partner through David J. Elzinga Professional Corporation.



Ernst & Young Inc.
Ernst & Young Tower
1000, 440 2nd Avenue S.W.
Calgary, Alberta T2P 5E9

Tel: 403 290 4100
Fax: 403 290 4265
ey.com/ca

THIS IS EXHIBIT " H " ..
referred to in the Affidavit of
Robert J. Taylor
Sworn before me this 24
Day of May A.D. 2012

Memorandum

To: Platinum Investment Trust
cc: Mr. Shariff Chandran and Chitra Chandran
From: Robert Taylor, Ernst & Young LLP
Email: sheriff@platinumequities.com; chitra@platinumequities.com

ADMITTED TO COVER FOR CATES
IN ROBERT JAMES KENNEDY
Barrister and Solicitor

02 April 2012

Platinum Investment Trust ("PIT") – Inspection of the Books and Records

As you are aware, I was appointed as inspector (the "Inspector") of PIT by the PIT Unitholders. The Inspector is to investigate and report to the Unitholders, on, among other things, the funds raised and received by the Trustees, all accounting, reconciliations and other information maintained by the Trustees, on the use of the investors' funds and whether the funds are secured against any properties.

The PIT information and documentation made available to the Inspector last week was limited. We discussed that I would provide a memorandum to you setting out the additional information required with respect to the Inspector's investigation. In that regard, below is a summary of the information required by the Inspector:

1. Attached as Schedule "A" is a summary of what I understand to be the current outstanding loans entered into by PIT (either directly through funds raised in PIT or from PMIC I and PMIC II). With respect to Schedule "A" please provide or confirm the following with respect to each loan/mortgage as at March 31, 2012:
 - confirmation of the initial loan/mortgage amount;
 - confirmation of the mortgagee;
 - amount of interest earned or accrued. Please provide a spreadsheet setting out the interest;
 - amount of repayments received. Please provided specific details including copies of cheques received, deposit books, bank statements indicating the account to which the funds were deposited;
 - current outstanding loan balance;
 - amount of expected recovery and the timing of such recovery; and
 - confirmation of the status of the loans/mortgages including bankruptcy documents for those parties in bankruptcy, any listing agreements where the

properties are listed for sale and proposed next steps contemplated by your legal counsel.

2. PIT bank account statements, deposit books and cancelled cheques for all years that the bank account was maintained. I understand that the PIT bank account was closed; however, the date the account was closed was not provided to the Inspector. You provided the Inspector with the PIT bank statements for 2008 and 2009, but there were no deposit books or cancelled cheques provided. Moreover, the bank statement for September 2009 was not included in the folder of bank account statements that was provided.
3. It appears that funds from various entities, PIT, Platinum Equities Inc., PIT General Partner Corp., PMIC I and PMIC II were comingled. Please provide the various bank statements, deposit books, cancelled cheques and accounting reconciliations detailing which entity received and disbursed the investors' funds.
4. A summary of all redemptions made to PIT Unitholders (and those PMIC I and PMIC II Unitholders that rolled their investments in PMIC I and PMIC II to PIT). Documentation is to include copies of cancelled cheques and bank account statements indicating the source of the funds and the quantum of the redemptions.
5. The detailed general ledger for the years ending December 31, 2008, 2009, 2010, 2011 and to March 31, 2012.
6. Financial statements for PIT for the years ended December 31, 2008, 2009, 2010 and 2011.

As you will appreciate the Unitholders are anxious for the Inspector to conclude its mandate. Please arrange to have the aforementioned documentation available for the Inspector's review by April 9, 2012.

Should you have any questions please contact me.

Regards,



Robert J. Taylor

Platinum Investment Trust
 Loan Summary
 As at March 31, 2012
 (CDN \$, Unaudited)

Asset	Mortgagor	Mortgagee	Initial Mortgage Amount	Interest	Repayments	Current Outstanding Balance	Estimated Recovery	Legal Representation	Status
536 Varsity Estates Place N.W.	Geoffrey Filson	Platinum Equities Inc.	240,000.00		215,000.00	25,000.00	0.00	None	House listed for sale
Promissory Note	Juan Ochoa	Platinum Equities Inc.	60,000.00		0.00		0.00	None	Bankrupt
825, 829, 833 and 837 9th St. Canmore	Navigator Development Canmore Corporation	PMIC II Investments Ltd.	2,500,000.00		1,620,000.00		500,000.00	Ryan Pelletier	Two condos remain listed for sale, there is \$500,000 in Court
33 Val Gardena Place S.W. 3316 Copithorn Road N.W. 702 Centre SA Street N.W.	Kamal Dhillon, Kewal Dhillon, Neil Dhillon and Parmjit Dhillon	PIT General Partner Corp. Platinum Equities Inc.	216,272.00 111,500.00	104,753.01 67,675.00	321,025.01 0.00	0.00 179,174.81	n/a Unknown	Jakub Ksiazek	Paid out October 1, 2010. Security remains on 33 Val Gardena, other two houses sold
11575 14th Street N.E.	Intreo Corp.	Accretive Asset Management Corporation	1,115,000.00		0.00	2,400,000.00	Unknown	Ryan Pelletier	Property listed for sale
101 -105, 204-208 and 304 - 308 1604 15th St. S.W.	1506396 Alberta Ltd.	Accretive Asset Management Corporation	650,000.00		450,000.00	200,000.00	200,000.00	none	Waiting for additional condo units to sell
2848 - 85th St. S.W.	Sukhwant Shergill	PIT General Partner Corp.	301,431.57		0.00	550,000.00	550,000.00	none	Currently paying interest only
604, 1st St. S.W.	Sociale Bar & Grille Ltd.	1576249 Alberta Ltd.	200,000.00		0.00		Unknown	Ryan Pelletier	Waiting for appraisal

THIS IS EXHIBIT "I"
 Attached in the Affidavit of
 Robert J. Tanior
 Sworn before me on 3/24/12
 Day of MAY A.D. 2012

 COMMISSIONER FOR THE
 COURT OF THE PROVINCE OF ALBERTA
 ROBERT JAMES KENNEDY
 Barrister and Solicitor