



This is the 1st affidavit
of S. Leduc in this case and was
made on March 13, 2018

No. S174308
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INDUSTRIAL ALLIANCE INSURANCE AND FINANCIAL
SERVICES INC.

PLAINTIFF

AND:

WEDGEMOUNT POWER LIMITED PARTNERSHIP
WEDGEMOUNT POWER (GP) INC.,
WEDGEMOUNT POWER INC.
THE EHRHARDT 2011 FAMILY TRUST
POINTS WEST HYDRO POWER LIMITED PARTNERSHIP
by its general partner POINTS WEST HYDRO (GP) INC.
CALAVIA HOLDINGS LTD.
SWAHEALY HOLDINGS LIMITED
BRENT ALLAN HARDY
DAVID JOHN EHRHARDT
28165 YUKON INC.
PARADISE INVESTMENT TRUST
SUNNY PARADISE INC.

DEFENDANTS

AFFIDAVIT


I, STÉFANIE LEDUC, of 1080 Grande Allée West, Quebec City, Quebec G1K 7M3
SWEAR THAT:

1. I am a Portfolio Manager – Private Placements working for the Plaintiff, Industrial Alliance Insurance and Financial Services Inc. ("IA"), and as such, have personal knowledge of the facts and matters hereinafter deposed to, save and except where the same are stated to be based on information and belief, and where so stated I verily believe them to be true.
2. I have read the Affidavit of Bruce Chow made January 19, 2018 (the "**Chow Affidavit**"), the Affidavit of Melinda McKie (the "**McKie Affidavit**"), the Affidavit of Paul Chambers (the

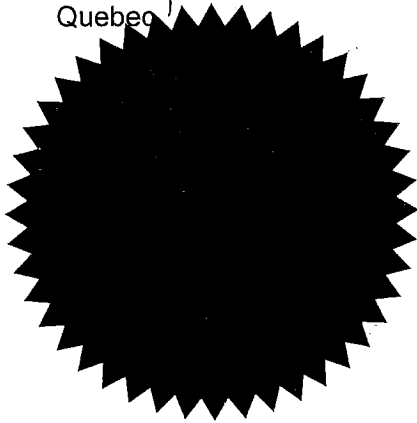
"Chambers Affidavit"), the Affidavit of Michael Potyok (the "Potyok Affidavit"), and the Affidavit #2 of Luc Fournier (the "Fournier Affidavit") sworn in this matter. I have adopted the capitalized terms used in the McKie Affidavit, unless otherwise defined herein.

3. Paragraphs 3 through 12 of the Fournier Affidavit accurately set out the background facts of this matter.

4. On June 14, 2017, I attended a meeting between IA and BCH to discuss the Project following the appointment of the Receiver. Vic Rempel, Ryan Hefflick, Olha Lui and Joanne McKenna attended the meeting on behalf of BCH. I attended on behalf of IA along with Luc Fournier and Maxime Durivage. I understood that Olha Lui and Joanne McKenna represented the BCH department responsible for EPAs. During this meeting, Olha Lui informed us that IA should not worry about the EPA remaining valid even if the COD was not achieved by September 30, 2017. Attached hereto as Exhibit "A" is a true copy of notes that I took during the June 14, 2017 meeting. The notation "ISD + 90 days for COD target" was my way of recording Olha Lui's comment that the Target COD would be set in the final facilities study report 90 days from the In-Service Date set out therein.

SWORN BEFORE ME at the City of)
Quebec, in the Province of Quebec,)
this 13 day of March, 2018.)
)
)
A Notary in and for the Province of)
Quebec)


STÉFANIE LEDUC



THIS IS EXHIBIT "A" REFERRED TO IN THE
AFFIDAVIT OF **STÉFANIE LEDUC**, SWORN BEFORE
ME AT QUEBEC CITY, QUEBEC, THIS 13 DAY OF
MARCH, 2018.

Véronique Plouffe, notaire

A Notary in and for the Province of Quebec

14/06/17

BCH

- October start swimming.
- will draw on LC but will read email from legal dep.
- Need to see things moving / & bills paid to go on in EPA.
- Need to be aware of change of control.
- ISD + 90 days for COD.. target water connection service date.
- > drawing / clearances in subdivision needed as well (in addition of CE drawings).

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DEFENDANTS

AFFIDAVIT

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