



This is the 1<sup>st</sup> Affidavit of Lisa C. Hiebert in this case and was made on October 11, 2022.

No. S-220231  
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA  
IN BANKRUPTCY AND INSOLVENCY

IN THE MATTER OF THE RECEIVERSHIP OF  
OTSO GOLD CORP.

BETWEEN:

PANDION MINE FINANCE LP, RIVERMET RESOURCE CAPITAL LP  
AND PFL RAAHE HOLDINGS LP

PETITIONERS

AND:

OTSO GOLD CORP.

RESPONDENT

AFFIDAVIT #1 OF LISA C. HIEBERT

I, Lisa C. Hiebert, Lawyer, of 1200 – 200 Burrard Street, Vancouver, British Columbia, MAKE OATH AND SAY AS FOLLOWS:

- I am a Partner at Borden Ladner Gervais LLP (“BLG”), counsel for Deloitte Restructuring Inc., the court-appointed receiver (the “Receiver”) of the assets, undertakings and properties of Otso Gold Corp. (“OGC”), and as such, I have personal knowledge of the facts deposed to in this Affidavit, except where stated to be based on information and belief, in which case, I believe that such information is true and accurate.
- Attached and marked as **Exhibit “A”** to this Affidavit are true copies of the accounts of BLG in this matter (collectively, the “Accounts”), as follows:

Invoice Number	Invoice Date	Amount
698075769	February 4, 2022	\$56,252.42
698094978	April 4, 2022	\$62,090.27
698095276	April 4, 2022	\$28,362.60
698112505	May 17, 2022	\$27,279.98
695118052	June 3, 2022	\$5,600.00

698130355	July 11, 2022	\$2,385.11
698160701	October 5, 2022	\$11,309.78
<b>TOTAL:</b>		<b>\$193,280.16</b>

Since this matter is ongoing, the Accounts are redacted to the extent necessary to protect confidential, commercially-sensitive or privileged information.

3. As detailed in the Accounts, from January 14, 2022 to September 30, 2022, the invoiced fees and disbursements incurred by BLG, inclusive of taxes, amounted to a total of \$193,280.16, which consists of \$171,762.50 in fees, \$869.66 in disbursements, \$8,624.61 in GST and \$12,023.39 in PST.
4. Attached and marked as **Exhibit "B"** to this Affidavit is a summary of the incurred fees, calculated on the basis of the hours spent by BLG professionals in relation to the Accounts, which amounts to 327.20 hours, multiplied by the applicable hourly rates charged by BLG. As set out in Exhibit B and the Accounts, certain discounts were applied to the Accounts.
5. To the best of my knowledge, information and belief, the information, contained in the Accounts as to the number of hours worked, the nature of the work performed, the identity of the individuals who performed the work and the rates charged for the work performed is true and correct in all respects.
6. In the course of these proceedings, a number of matters were required of BLG. Particulars of this work are set out in the detailed narratives provided with the Account, and included among other things:
  - (a) preparing for and attending the court applications in this matter, including attendances on January 14, February 2, April 12 and April 14, 2022;
  - (b) numerous and extensive communications and discussions with the Receiver, the Petitioners, the Petitioners' counsel, and various secured creditors and other stakeholders regarding these proceedings, including the transition from CCAA into receivership and other matters related to the receivership proceedings;
  - (c) numerous and extensive communications and discussions to facilitate changes to the board of directors of OGC's directly and indirectly owned subsidiaries, Otso Gold AB and Otso Gold OY;

- (d) communications in respect of the sale process for OGC's joint venture interest, including preparing the Asset Purchase Agreement, court approval and concluding the transaction;
  - (e) numerous and extensive communication and discussions with third-parties in regards to Otso's books and records;
  - (f) various communications to coordinate these proceedings with the insolvency proceedings in Sweden for Otso Gold AB and Finland for Otso Gold OY, including considering issues related to the potential transaction for the shares of Otso Gold OY and the restructuring program in the Finnish insolvency proceedings;
  - (g) coordinating issues with the insolvency proceedings in Finland and Sweden in respect of OGC's subsidiaries (including in respect of the potential transaction for the mine in Finland, owned by Otso Gold OY)
  - (h) considering and attending to various requests by third party stakeholders; and
  - (i) assisting the Receiver in preparation of its Reports to Court.
7. The majority of the work on this file was completed by me. During the relevant time period, the other lawyers who assisted was were Matthew Kronby, Kent Kufeldt, Beverly Gilbert, Randy Morphy, Magnus Verrugge, Danielle Lewchuk, Ryan Laity, Parisa Hurst and Jennifer Pepper. We were also assisted by our paralegals Catherine Connor, Victoria Smith, Pippa Sugimoto, Caitlin Hansen and Casandra Lopes.

### **Hourly Rates and Expertise**

#### Insolvency and Restructuring

8. During and since the relevant time period, Mr. Verbrugge, Mr. Laity, Ms. Pepper and I have practiced in the area of insolvency law.
9. During the period of which the Accounts were issued, my standard hourly rate was \$605. I was called to the bar in Alberta in 2007 and British Columbia in 2009. During and since the relevant time period, I have practiced in insolvency and restructuring law, with a focus on commercial restructuring and receivership matters.
10. During the period over which the Accounts were issued, Mr. Verbrugge's hourly rate was \$790, Mr. Laity's hourly rate was \$560 and Ms. Pepper's hourly rate was \$395. Mr. Verbrugge, Mr. Laity and Ms. Pepper were called to the bar in British Columbia in 1998, 2014 and 2021, respectively.

During the relevant time period, Mr. Verbrugge, Mr. Laity and Ms. Pepper have practiced in insolvency and restructuring law.

#### Securities, Tax and Real Estate

11. During the period over which the Accounts were issued, Mr. Kufeldt's hourly rate was \$970. Mr. Kufeldt was called to the bar in Alberta in 1989 and in British Columbia in 2011. During and since the relevant time period, Mr. Kufeldt has practiced in mergers, acquisitions, and reorganizations of public and private companies. Mr. Kufeldt assisted in reviewing the Asset Purchase Agreement.
12. During the period over which the Accounts were issued, Ms. Gilbert's hourly rate was \$880. Ms. Gilbert is a commodity tax expert and has been a chartered accountant since 2001. During and since the relevant time period, Ms. Gilbert has provided advice on commodity tax issues. Ms. Gilbert assisted in reviewing the tax elements of the Asset Purchase Agreement.
13. During the period over which the Accounts were issued, Mr. Morphy's hourly rate was \$870 and Ms. Lewchuk's hourly rate was \$565. Mr. Morphy and Ms. Lewchuk were called to the bar in British Columbia in 2005 and 2014, respectively. During and since the relevant time period, Mr. Morphy and Ms. Lewchuk have practiced in tax law. Mr. Morphy and Ms. Lewchuk assisted in reviewing the tax elements of the Asset Purchase Agreement.
14. During the period over which the Accounts were issued, Ms. Hurst's hourly rate was \$545. Ms. Hurst was called to the bar in British Columbia in 2015. During and since the relevant time period, Ms. Hurst has practiced in commercial real estate. Ms. Hurst assisted with the real estate due diligence matters and transaction issues related to the Asset Purchase Agreement.

#### International Trade

15. During the period over which the Accounts were issued, Mr. Kronby's hourly rate was \$1,150. Mr. Kronby was called to the bar in Ontario in 1990 and the New York bar in 2000. During and since the relevant time period, Mr. Kronby has practiced international trade and investment law. Mr. Kronby assisted with advice regarding the potential impact of sanctions and international issues related to the proceedings, including in response to inquiries from prospective board members for OGC's subsidiaries.

#### Paralegals

16. During the period over which the Accounts were issued, Ms. Connor's hourly rate was \$305. Ms. Connor is a senior paralegal and assisted with various tasks in the course of these proceedings,

including preparing application materials and issues related to hearings, including application records and coordinating filings.

17. During the period over which the Accounts were issued, Ms. Smith's hourly rate was \$275, Ms. Sugimoto's hourly rate was \$265 and Ms. Lope's hourly rate was \$215. Ms. Smith, Ms. Sugimoto and Ms. Lopes are paralegals that assisted with due diligence matters related to the Asset Purchase Agreement.
18. During the period over which the Accounts were issued, Ms. Hansen's hourly rate was \$225. Ms. Hansen is a paralegal and has assisted Ms. Hiebert and the other lawyers involved in this matter with various tasks in the course of these proceedings, including notices to stakeholders and maintenance of the service list.


#### **The Fees are Reasonable**

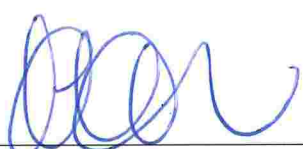
19. I have reviewed the Accounts and confirm that, to the best of my knowledge, information and belief, the fees accurately reflect the work that was done in connection with this matter, and that all the time spent was reasonable and necessary. I have also considered the delegation of work within the firm and note that where possible, particularly when it was practicable and efficient to do so, the work was carried out by individuals with lower hourly rates. To the extent more senior counsel carried out the work, this was to maintain efficiency due to additional background and expertise, and to address complex issues.
20. I have reviewed the Accounts and based on my experience as a lawyer practicing in the area of insolvency law and familiarity with this matter, verily believe that:
  - (a) the professional fees and disbursements have been properly incurred and are fair and reasonable in the circumstances;
  - (b) as noted above, the work was delegated to the appropriate professionals with the appropriate seniority, expertise, and hourly rates,
  - (c) the Accounts were provided to the Receiver when rendered, and all have been approved by the Receiver; and
  - (d) the services were provided by BLG in a prudent and economical manner, including avoiding duplication.
21. BLG assesses the hourly rates of its professionals annually, and based on this annual review and on my experience in insolvency matters, I believe that the hourly rates for each of the timekeepers and BLG professionals over the Accounts period are consistent with those charged by similar firms

in the Vancouver market for lawyers in insolvency and restructuring with similar levels of experience and expertise, and with the capacity to handle a file of similar size and complexity. I also noted that, where necessary, the accounts have been adjusted so that the effective rates charged are lower than the standard rates set out above.

22. I swear this Affidavit expressly for the purposes of the Receiver's application to approve its accounts and the BLG Accounts, and for no other purpose. In particular, nothing herein is a waiver of solicitor-client privilege by the Receiver.

SWORN BEFORE ME at the City of Vancouver )  
in the Province of British Columbia, this 11<sup>th</sup> day )  
of October, 2022 )  
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A Commissioner for taking Affidavits  
for British Columbia

  
\_\_\_\_\_  
LISA C. HIEBERT

**JENNIFER PEPPER**  
*Barrister & Solicitor*  
**BORDEN LADNER GERVAIS LLP**  
1200 Waterfront Centre, 200 Burrard Street  
P.O. Box 48600, Vancouver, Canada V7X 1T2  
604-640-4106

This is **Exhibit "A"** referred to in **Affidavit #1**  
of **Lisa C. Hiebert** made before me  
on October 11, 2022



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A Commissioner for taking Affidavits  
for British Columbia

**IN THE MATTER OF THE RECEIVERSHIP OF OTSO GOLD CORP.**  
**Summary of BLG Accounts**

<b>Invoice No.</b>	<b>Invoice Date</b>	<b>Net Fees</b>	<b>Disbursements</b>	<b>GST</b>	<b>PST</b>	<b>Total</b>
698075769	04-Feb-22	\$50,184.00	\$44.13	\$2,511.41	\$3,512.88	\$56,252.42
698094978	April 4, 2022	\$55,141.50	\$315.98	\$2,772.88	\$3,859.91	\$62,090.27
698095276	April 4, 2022	\$25,290.00	\$36.00	\$1,266.30	\$1,770.30	\$28,362.60
698112505	May 17, 2022	\$24,029.50	\$355.50	\$1,212.91	\$1,682.07	\$27,279.98
695118052	June 3, 2022	\$5,000.00	\$0.00	\$250.00	\$350.00	\$5,600.00
698130355	July 11, 2022	\$2,117.50	\$13.50	\$105.88	\$148.23	\$2,385.11
698160701	October 5, 2022	\$10,000.00	\$104.55	\$505.23	\$700.00	\$11,309.78
		<b>\$171,762.50</b>	<b>\$869.66</b>	<b>\$8,624.61</b>	<b>\$12,023.39</b>	<b>\$193,280.16</b>





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Deloitte Restructuring Inc.  
939 Granville Street  
Vancouver, BC V6Z 1L3

February 4, 2022

Attention: Melinda McKie

Invoice # 698075769  
Page 1

Re: Otso Gold Receivership

File No: 560836/000013

PROFESSIONAL SERVICES rendered to January 31, 2022 in connection with the above matter as described in the attached.

Fees	\$ 52,684.00
Less Discount	(2,500.00)
Fee Balance	<u>50,184.00</u>
Disbursements and Other Charges	44.13
GST on Fees and Taxable Disbursements and Other Charges	2,511.41
PST on Fees and Taxable Disbursements and Other Charges	<u>3,512.88</u>
Total this Invoice	<u><u>\$ 56,252.42</u></u>

THIS IS OUR ACCOUNT - E. & O.E.

**BORDEN LADNER GERVAIS LLP**

For: Lisa Hiebert



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PROFESSIONAL SERVICES RENDERED to January 31, 2022

Jan 14, 2022	L. Hiebert	0.80	Call with M. McKie re issue arising from appointment order and next steps and call with M. McKie and M. Buttery (Pandion counsel) re same; emails re next steps arising from order.	\$ 484.00
Jan 15, 2022	L. Hiebert	3.70	Emails with T. Dillenseger and M. McKie re cash flow and funding requirements; consider funding and jurisdiction issues and next steps and discussion with M. McKie re same; email to M. Buttery re funding and jurisdiction issues and strategies for same.	2,238.50
Jan 15, 2022	M.C. Verbrugge	1.20	Discuss and consider jurisdictional and other receivership and CCAA transitional issues.	948.00
Jan 16, 2022	L. Hiebert	5.00	Call with Pandion business and legal team re issues arising from receivership appointment, next steps and issues arising from same; call and emails with M. McKie re issues for receivership, strategies to address same and next steps; emails to Sweden and Finland counsel re local counsel for change in control of subsidiaries (exercising shareholder rights); email to R. Morse (Otso counsel) re change in control and information request arising from receivership order; review and consider draft order and emails with J. Enns (counsel to Pandion) re same.	3,025.00



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Jan 17, 2022	L. Hiebert	6.00	Call with D. Andersson and T. Dillenseger (A&M) and M. McKie re status of Canadian proceedings; call with M. McKie re next steps and issues arising from management budget conversation; call with D. Andersson and T. Dillenseger (A&M), P. Jaatinen and C. Svartstrom (Otso's Finland counsel), J-P. Mutanen (Pandion's Finland counsel), M. McKie and N. McGregor re status of Finland proceedings and issues for same; email from R. Morse (Otso's Canadian counsel) re transition matters and consider same; email from R. Morse re expression of interest in asset purchase; correspondence from K. McEwan (counsel to Brunswick) re document issues and consider response to same; discussion with M. McKie re various issues arising from document request and response to same and other issues for next steps.	3,630.00
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Jan 18, 2022	L. Hiebert	6.10	Consider response to K. McEwan (Brunswick counsel) request, prepare response to same and discussion with M. McKie re issues for same; call with D. Andersson and T. Dillenseger (A&M), M. McKie and N. McGregor re operational issues and impact on restructuring; various emails with R. Morse (Otso group counsel) re requests for records and various related issues; emails with potential counsel in Sweden and Finland re change of control; call with W. Stransky (Brunswick counsel) re response to request and issues arising from same; call with C. Mallon, V. Koshkin and N. Pascault (Otso board members), R. Morse, M. McKie and N. McGregor re various issues; numerous emails with M. Buttery and others re issues arising from Otso OY payments and other issues for next steps; discussion with M. Buttery re various issues; emails with B. Endemann (Duff & Phelps) re Otso records with service provider, notice of Order and issues arising from same.	3,690.50
Jan 18, 2022	M.C. Verbrugge	0.50	Discuss receivership issues around preservation of company records and emails.	395.00



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Deloitte Restructuring Inc.  
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Jan 19, 2022	L. Hiebert	3.50	Emails with A. Wallgren re arrangements for counsel in Sweden and information required; emails with J-P. Mutanen (Pandion's Swedish counsel) re corporate information for change of control; call with M. McKie re various issues, strategies to address same and next steps; consider issues re Westech contract and security held in CCAA proceeding; emails to stakeholders re securing Otso property and documents; email to K. McEwan and W. Stransky (Brunswick counsel) re preservation of records; call with R. Morse re documents and issues for same; call with V. Tickle (Westech counsel) re service provider issues and deposit; email to Swedish counsel re corporate records to implement change of control.	2,117.50
Jan 20, 2022	C. Hansen	0.60	Review pleadings filed to date and prepare service list.	135.00
Jan 20, 2022	L. Hiebert	3.50	Call with R. Morse (Otso counsel) re records and other transition issues; call with B. Endemann (Kroll), M. Gimovsky (Kroll in-house counsel) and R. Morse re Otso records; emails with M. Aden (Swedish counsel) re change in control; emails re information and documents to implement changes in control; call with M. McKie re various issues and next steps; email to Kroll re entered order and disclosure of documents.	2,117.50
Jan 20, 2022	R.M. Laity	0.30	Review correspondence of J. Enns and court materials of Pandion; consider same; (receivership)	168.00
Jan 21, 2022	C. Hansen	0.40	Multiple revisions/updates to service list to incorporate new information.	90.00



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Jan 21, 2022	L. Hiebert	4.00	Emails with D. Matthews (counsel to CAVU Mining) re offer for Star property; email to K. McEwan and W. Stransley re response to letter re documents; discussions with M. McKie re various issues and next steps; call with M. McKie, D. Matthews and J. Verbaas (CAVU Mining) re potential offer for mining property; call with W. Stransky re document issues; emails with B. Hicks (counsel to Kroll); emails with M. McKie re document issues and next steps for same; review and consider offer from CAVU Mining; consider issues re preservation of records and prepare letter re same.	2,420.00
Jan 22, 2022	L. Hiebert	3.40	Email from M. Buttery (counsel to Pandion) re correspondence from Otso Oy board and consider same; call with M. McKie re issues arising from correspondence and response to same; prepare response to M. Buttery and consider issues for same; review and consider CAVU term sheet; consider issues for potential transaction for Star property.	2,057.00
Jan 23, 2022	L. Hiebert	1.40	Consider issues for potential asset sale and emails re same; revise letter re preservation of Otso records; call with M. Buttery re issues and next steps and consider issues arising from same; call with M. McKie re strategic issues and next steps.	847.00
Jan 23, 2022	J. Pepper	3.60	Review and summarize JV Agreement for assignments, restrictions and obligations on the Monitor	1,422.00
Jan 24, 2022	C. Hansen	0.10	Review email re: service list and consider next steps re: same.	22.50



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Jan 24, 2022	L. Hiebert	6.00	Call with M. McKie re various issues for transition and control of foreign entities; call with J. Carhart and B. Hicks (counsel to Kroll) re document issues and consider same; emails with M. McKie and N. McGregor re document issues; emails from J-P. Mutanen (Finland counsel to Pandion) re funding arrangements; call to R. Morse (CCAA counsel to Otso) re issues for payments and retainer to Farris; call to W. Stransky (counsel to Brunswick) re request for information; call with M. McKie re various issues and next steps for restructuring and potential steps in Finland; email to M. Buttery (Canadian counsel to Pandion) and J-P. Mutanen re proposed loan agreement; consider JV issues for potential sale of BC asset and email to M. McKie re same.	3,630.00
Jan 24, 2022	J. Pepper	5.20	Review and summarize JV Agreement for assignments, restrictions and obligations on the Monitor	2,054.00
Jan 25, 2022	L. Hiebert	5.70	Various emails re issues for preservation of value; call with M. McKie, Pandion team (legal and operations) and D. Andersson (A&M) re issues for financing; emails with Swedish counsel re coordinating financing; call with [REDACTED] representatives and M. McKie re potential transaction interest; call with CRO candidate and consider issues arising from same; review and consider financing document and emails re same; call with M. Buttery (counsel to Pandion), M. McKie and P. Reynolds re strategy for next steps and recovery options; call with V. Tickle (counsel to Westech) re services to mine and Otso document issues; email to R. Morse re document issue.	3,448.50

PAYABLE ON RECEIPT  
 INTEREST AT THE RATE OF 12.0% PER ANNUM MAY BE CHARGED ON ACCOUNTS WHICH ARE OVERDUE  
**GST/HST REGISTRATION # R869096974RT0005**



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Jan 26, 2022	C. Hansen	0.20	Update service list to include additional recipients.	45.00
Jan 26, 2022	L. Hiebert	6.90	Consider issues re change in control of subsidiaries and emails re same; call with M. Buttery (Canadian counsel to Pandion), J-P. Mutanen (Finnish counsel to Pandion), M. McKie and P. Reynolds re strategy issues and next steps; call with Pandion team re efforts to replace board; call with P. Bernier and J. Hedalen (Prosper Gold) and M. McKie re transaction opportunity; various emails with W. Stransky (counsel to Brunswick) re documents issues and consider issues arising from same; emails with R. Morse (CCAA counsel to Otso) re documents issues; call with M. McKie re various restructuring issues and strategies to address same; call with M. Buttery, B. Bennett (US counsel to Pandion) and Pandion operations team re status, strategy and next steps; call with J. Carhart (counsel to Kroll) re document issues; further call with W. Stransky; emails with J. Carhart and W. Stransky re document issues.	4,174.50
Jan 27, 2022	C. Hansen	0.20	Update service list and send same to counsel for review.	45.00





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Jan 27, 2022	L. Hiebert	6.40	Call with V. Tickle (counsel to Westech) re document issues and issues for restructuring; calls with CRO and director candidates re change of control of Sweden/Finland; call with Pandion operations and legal team and M. McKie re status and next steps; call with J. Carhart and B. Hicks (counsel to Kroll) and W. Stransky (counsel to Brunswick) re document issues and potential application; call with M. McKie re various issues for restructuring and next steps; call with M. Kronby re sanctions questions raised by director candidates; email from C. Mallon (Otso board member) re various issues and consider same; discussion with M. McKie re issues raised by Otso board and other parties and strategies to address same; consider issues for document preservation and arrangements for notices to third parties re same; emails with W. Stansky re issues for potential upcoming application and timing for same; consider response to issues raised by Otso board.	3,872.00
Jan 27, 2022	M. Kronby	0.80	Call with L. Hiebert re Russia sanctions questions and prep for same.	920.00
Jan 27, 2022	R.M. Laity	0.70	Review correspondence re: Brunswick application re: securing electronic documents; consider same; review/consider correspondence of M. McEwan (Brunswick counsel) regarding preservation order and deleted emails;	392.00
Jan 27, 2022	J. Pepper	0.10	Consider drafting letters to parties holding Record information	39.50



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Jan 28, 2022	L. Hiebert	3.50	Consider issues arising from correspondence from Otso Board and further information required; prepare response to Otso Board; emails re issues for changes to subsidiary boards; consider issues for recovery of Otso records and letters to confirm same; call with M. McKie re various strategic issues and next steps; review and consider proposals and interest in assets and consider issues for sale process and realization arising from same; emails with potential bidders on assets; email from W. Stransky re document issues and consider same; emails with M. McKie re document issues.	2,117.50
Jan 28, 2022	J. Pepper	1.60	Draft letters to parties holding Records information	632.00
Jan 29, 2022	L. Hiebert	0.80	Emails with M. McKie re document issues; email to W. Stansky re document issues; review and consider confidentiality agreement proposed by interested party; emails with potential bidder; call with M. McKie re offers and interest in assets.	484.00
Jan 30, 2022	L. Hiebert	1.00	Consider issues re document recovery; email and call with V. Tickle (counsel to Lionsbridge) re document issues and next steps for same; email to J. Carhart (counsel to Kroll) and V. Tickle re document issues and next steps.	605.00
Jan 31, 2022	C. Hansen	0.20	Consider new party information and update service list to incorporate same.	45.00



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 Re: Otso Gold Receivership

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Jan 31, 2022	L. Hiebert	4.30	Emails with J. Carhart (counsel to Kroll) and M. McKie re issues and next steps for document recovery and preservation; review and consider final form of receivership order and emails with J. Enns re same; call with M. McKie re operational issues and board changes and consider issues arising from same; emails with M. Buttery (counsel to Pandion) re board changes; various emails re board candidates and call with candidate; call with M. McKie re various issues; email to J. Carhart re issues for documents and next steps for same.	2,601.50
Jan 31, 2022	R.M. Laity	0.20	Review correspondence of S. Danielsz regarding updated receivership order.	112.00
Jan 31, 2022	J. Pepper	4.20	Draft CCAA application/order to discharge monitor and fee approval; Draft supporting affidavit documentation	1,659.00

TO OUR FEES	\$ 52,684.00
Less Discount	(2,500.00)
FEE BALANCE	<u>50,184.00</u>

FEE SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Avg. Rate/Hr.</u>	<u>Amount</u>
C. Hansen	1.70	\$ 214.33	\$ 364.36
L. Hiebert	72.00	576.29	41,492.97
M. Kronby	0.80	1,095.43	876.34
R.M. Laity	1.20	533.42	640.10
J. Pepper	14.70	376.26	5,530.96
M.C. Verbrugge	1.70	752.51	1,279.27

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92.10

\$ 50,184.00

DISBURSEMENTS AND OTHER CHARGES:

<u>Taxable</u>		G=GST; Q=QST; H=HST; P=PST	
	Courier		<u>\$44.13</u> G
	Total Taxable Disbursements and Other Charges		<u>44.13</u>
	Total Disbursements and Other Charges		44.13
	Total Fees and Disbursements and Other Charges		<u>50,228.13</u>
	GST on Fees and Taxable Disbursements and Other Charges		2,511.41
	PST on Fees and Taxable Disbursements and Other Charges		<u>3,512.88</u>
	TOTAL THIS INVOICE		<u><u>\$ 56,252.42</u></u>



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LH/LH

Re: Otso Gold Receivership

File No: 560836/000013

**REMITTANCE COPY**

Fees	\$ 52,684.00
Less Discount	(2,500.00)
Fee Balance	<u>50,184.00</u>
Disbursements and Other Charges	44.13
GST on Fees and Taxable Disbursements and Other Charges	2,511.41
PST on Fees and Taxable Disbursements and Other Charges	<u>3,512.88</u>
Total this Invoice	<u><u>\$ 56,252.42</u></u>

PLEASE REFER TO PAYMENT OPTIONS PAGE FOR REMITTANCE INFORMATION.



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Use one of the following payment methods and ensure your payment contains the details provided in the example.

Client Name	Client #	Invoice #	Amount	Comments
Deloitte Restructuring Inc.	560836	698075769	56,252.42 (CAD)	Payment for Invoice # 698075769

**Payment method # 1 - EFT/WIRE (Preferred Method)**

<b>Beneficiary Customer:</b> Borden Ladner Gervais, LLP Bay Adelaide Centre, East Tower 22 Adelaide Street West Toronto, ON, Canada M5H 4E3	<b>Beneficiary Bank:</b> Canadian Clearing Code: //CC000247696 Bank of Nova Scotia PO Box 4234 STN A Toronto, ON, Canada M5W 5P6
<b>Payments Originating from Canada or International Locations (Excluding US Dollars):</b> <b>12 Digit Account #:</b> 80002 14221 11 <b>Bank #:</b> 002 <b>Transit #:</b> 80002 <b>Swift Code:</b> NOSCCATT	<b>Payments Originating in US Dollars:</b> <b>ACH payments are not accepted</b> <b>12 Digit Account #:</b> 80002 51181 15 <b>Bank #:</b> 002 <b>Transit #:</b> 80002 <b>Swift Code:</b> NOSCCATT  <b>Intermediary Bank (If required):NOTE: do not use intermediary bank as the beneficiary bank</b> Bank of America NA 222 Broadway New York, N.Y. <b>Swift Code:</b> BOFAUS3N 10038 United States <b>ABA #:</b> 026009593

**Payment method # 2 - ONLINE PAYMENTS, CANADIAN FUNDS ONLY**

You may pay your invoice(s) to BLG through participating Canadian financial institution's online banking.

1. As a bill payment - Select **Borden Ladner Gervais** through your financial institution and enter your client # **560836**
2. As an Interac e-transfer - Add BLG's e-transfer email address [etransfers@blg.com](mailto:etransfers@blg.com) and enter the amount. No security question is required as BLG is Auto Deposit only. \*Note: your financial institution must support the Auto Deposit function.

**Remittance email required:** For payment methods #1 and #2 a payment confirmation must be sent by email to [remittanceadvice@blg.com](mailto:remittanceadvice@blg.com) and referencing your client number and invoice(s) paid.

**Payment method # 3 - CHEQUES**

<b>Send by mail:</b> Borden Ladner Gervais, LLP World Exchange Plaza 100 Queen Street, Suite 1300 Ottawa, ON, Canada K1P 1J9	<b>Send by courier:</b> Borden Ladner Gervais, LLP World Exchange Plaza 100 Queen Street, Suite 1000 Ottawa, ON, Canada K1P 1J9
Attach remittance details with payment and reference invoice(s) paid.	

For additional information contact [cashreceiptscoe@blg.com](mailto:cashreceiptscoe@blg.com) OR (613) 369-4777

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April 4, 2022

Attention: Melinda McKie

Invoice # 698094978  
 Page 1

Re: Otso Gold Receivership

File No: 560836/000013

PROFESSIONAL SERVICES rendered to March 31, 2022 in connection with the above matter as described in the attached.

Fees	\$ 55,141.50
Disbursements and Other Charges	315.98
GST on Fees and Taxable Disbursements and Other Charges	2,772.88
PST on Fees and Taxable Disbursements and Other Charges	3,859.91
	<hr/>
Total this Invoice	<u><u>\$ 62,090.27</u></u>

THIS IS OUR ACCOUNT - E. & O.E.

**BORDEN LADNER GERVAIS LLP**

For: Lisa Hiebert



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Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

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 Invoice # 698094978  
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PROFESSIONAL SERVICES RENDERED to March 31, 2022

Feb 1, 2022	L. Hiebert	3.50	Various emails re issues for changing boards; call with Receiver and Pandion team re various issues for realization and preservation of value; discussion with V. Tickle (counsel to Lionsbridge) re document issues; various emails re on-site issues and strategies to maximize value.	\$ 2,117.50
Feb 2, 2022	L. Hiebert	4.10	Calls with M. McKie re status, strategy and next steps and consider issues arising from same; call with Pandion team re various issues for value preservation and next steps; consider issues for board changes to preserve value and exercise shareholder rights; call with V. Tickle (counsel to Westech) re staffing issues and documents; consider issues for engagement of independent directors and prepare letter for same.	2,480.50
Feb 2, 2022	J. Pepper	3.20	Draft Engagement Letter.	1,264.00
Feb 3, 2022	C. Hansen	0.10	Update service list.	22.50
Feb 3, 2022	L. Hiebert	3.30	Various emails with foreign counsel re issues for board appointments and information required for same; emails with Prosper Gold re sale process for BC JV interest and consider issues for same; call to D. Matthews (counsel to CAVU Mines) re potential transaction for BC JV interest and consider issues arising from same; consider issues for document recovery and next steps for same; review and consider correspondence from H. Poulus (Counsel to Lionsbridge/Westech) re mine issues.	1,996.50





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Feb 4, 2022	L. Hiebert	3.30	Emails with M. McKie re contract issues and review same; call with M. McKie; review and consider revisions to documents for Sweden and Finland boards and emails re same; meeting with M. McKie, N. McGregor and [REDACTED] (director candidate) re next steps; various emails re board issues; meeting with M. McKie, J. Archibald and R. Byrne (Pandion) and M. Buttery (Pandion's counsel) re issues and next steps to preserve value of subsidiaries and board issues.	1,996.50
Feb 5, 2022	L. Hiebert	1.20	Discussion with M. McKie re director and board issues and consider strategies and next steps for same; emails with Sweden and Finland counsel re board changes; emails with M. McKie and others re update on status and next steps.	726.00
Feb 6, 2022	L. Hiebert	0.50	Call with P. Jaatinen (proposed administrator for Finland proceedings) re various issues and next steps for Finland proceedings.	302.50



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Feb 7, 2022	L. Hiebert	5.30	Emails with [REDACTED] (McEwen Valuation) re document recovery and related issues; numerous emails with counsel in Sweden and Finland re arrangements for board changes and arrangements for same; call with M. McKie re various issues and next steps; correspondence from K. McEwan (counsel to Brunswick) re claim issues and consider response to same; call to [REDACTED] (Avis Everyday Solutions) re document issues; arrangements for further requests and letters re records and documents; email to C. Mallon (director of Otso Gold) re information requests made of directors; prepare response to K. McEwan/Brunswick; emails with board candidates re information requests.	3,206.50
Feb 7, 2022	L. Hiebert	0.80	Call with J. Carhart (counsel to Kroll) re document issues and requests for same; call with W. Starnsky (counsel to Brunswick) responding to request for update; email to J. Carhart re document issues.	484.00



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Feb 8, 2022	L. Hiebert	8.30	Numerous emails with board members and Sweden/Finland counsel re arrangements for board changes; finalize letter to K. McEwan re claims issues; review documents and consider issues for board appointments and discussion with M. McKie re same; emails with M. McKie re operations issues and consider same; email from M. McKie re contract issues and consider same; email from V. Tickle (counsel to Westech) re operations/contract issues and consider response to same; call with [REDACTED] (Avis Everyday Solutions) re Otso records; call from [REDACTED] re potential transaction; call with N. Levine (counsel to Pandion) re document issues and other questions; discussion with M. McKie re various records issues; email to M. McKie re Westech issues.	5,021.50
Feb 8, 2022	J. Pepper	0.40	Draft Receiver's Certificate.	158.00

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Feb 9, 2022	L. Hiebert	9.80	Numerous emails with board members and Sweden/Finland counsel re arrangements for board changes; call with N. Levine and M. Burris (counsel to Pandion) re various issues; emails with [REDACTED] (McEwen Valuations) re records; consider assertion of privilege by Farris LLP in respect of McEwen Valuation records; arrangements to receive records from McEwen Valuation and Avis Everyday Solutions; review and consider evidence request in US court impacting receiver and consider issues arising from same; discussion with M. McKie re various issues and next steps including US information requests, sale process and other issues; prepare response to Brunswick re information request; consider issues to maximize value and other requirements pursuant to receivership order.	5,929.00
Feb 9, 2022	L. Hiebert	0.10	Email to J. Carhart (counsel to Kroll) re document issues.	60.50
Feb 9, 2022	J. Pepper	2.40	Draft letters to accountants regarding possession of Company records.	948.00
Feb 10, 2022	L. Hiebert	4.00	Emails with board candidates re finalizing appointments to preserve subsidiary value; finalize letter to K. McEwan re evidence requests; emails with stakeholders; consider sale process for JV interest; call with P. Jaatinen (Finland administrator) re potential transaction and issues for same.	2,420.00
Feb 10, 2022	L. Hiebert	0.10	Emails with J. Cotter (counsel to Microsoft) re document issues.	60.50
Feb 10, 2022	J. Pepper	0.80	Research the [REDACTED]	316.00
Feb 11, 2022	C. Hansen	0.10	Update service list.	22.50



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Feb 11, 2022	L. Hiebert	2.60	Emails with N. Ritala (Finland counsel), M. Aden (Sweden counsel) and board members re issues and arrangements to conclude board changes to preserve subsidiary value; emails re notices of board changes; consider JV sale process issues and email to M. McKie re same; emails with L. Kotler (counsel to Clearline) re document issues; consider issues arising from Brunswick positions; discussion with M. McKie re various issues.	1,573.00
Feb 11, 2022	L. Hiebert	1.40	Emails with J. Carhart (counsel to Kroll) and M. Gimovsky (in-house counsel to Kroll) re document issues; consider issues arising from Kroll position; email to V. Tickle (counsel to Lionsbridge) re document issues; call with R. Morse (counsel to Otso) and K. McEwan (counsel to Brunswick) re deleted emails.	847.00
Feb 11, 2022	J. Pepper	1.40	Research the [REDACTED]	553.00
Feb 11, 2022	M.C. Verbrugge	0.40	Discuss letters rogatory issue and related receivership issues.	316.00
Feb 12, 2022	L. Hiebert	0.60	Review and consider email from C. Mallon (OGC board member) re responses to information requests; email to M. McKie and N. McGregor re next steps and issues for same; consider Westech issues and prepare response to V. Tickle (counsel to Westech re same).	363.00
Feb 12, 2022	L. Hiebert	0.20	Email to H. Poulus (counsel to Lionsbridge) re deleted email issues.	121.00
Feb 14, 2022	C. Hansen	0.30	Inquire with JC Word Assist re: ordering hearing transcripts and consider next steps re: same.	67.50



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Feb 14, 2022	L. Hiebert	2.00	Call with J. Cotter and J. MacDonald (counsel to Osler) re records and consider issues arising from same; email to J. Cotter and J. MacDonald re communications with Microsoft; email from V. Tickle (counsel to Lionsbridge) re record issues; call with M. McKie re various issues; consider issues re deleted emails and emails re same.	1,210.00
Feb 14, 2022	L. Hiebert	2.00	Call with L. Kotler (counsel to Clearline) re records requests; emails with M. McKie re Westech issues; email from T. Fenton (corporate counsel to Otso) re record requests and consider issues arising from same; call with M. McKie re various issues.	1,210.00
Feb 15, 2022	C. Hansen	0.30	Complete order form for hearing transcripts; various communications re: same.	67.50
Feb 15, 2022	L. Hiebert	2.70	Email to T. Fenton (corporate counsel to Otso) re corporate records; call with V. Tickle (counsel to Westech) re contract issues and next steps for same; consider issues for sale process and emails with Prosper (JV Partner to Otso) and potential bidder re same.	1,633.50
Feb 15, 2022	L. Hiebert	1.00	Emails with K. McEwen (counsel to Brunswick) re deleted emails and response from Microsoft; discussion with V. Tickle (counsel to Lionsbridge) re deleted emails issues and next steps for same; discussion with M. McKie and N. McGregor re various document issues, sale process and other issues and next steps; consider issues re deleted emails and prepare response to J. Carhart (counsel to Kroll re same).	605.00
Feb 15, 2022	J. Pepper	0.60	Summarize research on waiving solicitor-client privilege.	237.00
Feb 16, 2022	C. Hansen	0.10	Review draft transcripts and send to counsel for review.	22.50

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Feb 16, 2022	L. Hiebert	3.40	Email to K. McEwan (counsel to Brunswick) re letter rogatory issue; email to L. Kotler (counsel to Clearline) re timing for delivery of records; email to R. Morse (former counsel to Otso) re retainer issue; emails and call with M. Buttery and J. Enns (counsel to Pandion) re process for resolving debt disputes; emails with T. Fenton (corporate counsel to Otso) re records; discussion with J. Pepper re sale process and issues for same; call with M. McKie re various issues and next steps and consider same; call with R. Morse (counsel to Otso) re process for resolving debt, deleted records and other issues; email to M. Buttery re Pandion debt issue; email to N. Pascault re responding to question regarding subsidiary boards.	2,057.00
Feb 16, 2022	L. Hiebert	0.60	Email to J. Carhart (counsel to Kroll) re delete emails issues and next steps for same; call with R. Morse re deleted records.	363.00
Feb 16, 2022	J. Pepper	1.90	Draft NDA for sale process.	750.50
Feb 17, 2022	L. Hiebert	0.40	Emails from C. Svartstrom (Administrator of Otso OY) and consider issues arising from same; consider inter-company claims and advancing same in Finnish proceedings; call with D. Matthews (counsel to potential bidder) re sale process for JV and consider same.	242.00
Feb 17, 2022	L. Hiebert	0.80	Emails with J. Carhart (counsel to Kroll) re deleted records.	484.00
Feb 18, 2022	L. Hiebert	0.80	Discussion with M. McKie and N. McGregor re sale process; call with D. Matthews (counsel potential bidder); consider issues for sale process; email to J. Hedalen (Prosper) re JV agreement and information related to same; emails with P. Jaartinen (Finland administrator) re next steps.	484.00

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Feb 18, 2022	L. Hiebert	2.40	Call with J. Carhart (counsel to Kroll), B. Endemann and M. Gimovsky (Kroll) and N. McGregor re deleted records; consider issues arising from call with Kroll; email to K. McEwan and W. Stransky (counsel to Brunswick) deleted emails issue; email to V. Tickle (counsel to Lionsbridge) re deleted records and access to server; discussions with N. McGregor and M. McKie re next steps re records; emails with J. Carhart re call re records; emails with V. Tickle re terms for delivery of records.	1,452.00
Feb 21, 2022	L. Hiebert	0.30	Call with V. Tickle (counsel to Lionsbridge) re document issues.	181.50
Feb 21, 2022	L. Hiebert	0.50	Consider issues for sale process and emails re same.	302.50
Feb 22, 2022	L. Hiebert	3.30	Emails with M. McKie and T. Dillenseger (A&M) re Westech services/invoice; emails with M. McKie and N. McGregor re Otso record issues; emails with V. Tickle (counsel to Lionsbridge) re Otso record issues; emails re modification of Lionsbridge/Otso/Kroll agreement for delivery of records; email to J. Carhart (counsel to Kroll) re arrangements for delivery of records; call with M. McKie, N. McGregor and Prosper Gold re JV; consider issues for sale process and emails re same; review and consider form of NDA for sale process; emails with M. McKie and N. McGregor re sale process issues; receive records from Clearline and email to M. McKie and N. McGregor re same.	1,996.50





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Feb 23, 2022	L. Hiebert	2.20	Call with C. Svartstrom, M. McKie and N. McGregor re issues arising from Finnish proceedings and next steps arising from same; emails with V. Tickle (counsel to Westech) re invoices and contract arrangements; consider issues re JV sale process and emails with M. McKie and N. McGregor re same; correspondence from R. Morse re process for addressing Pandion debt and emails from M. Buttery (counsel to Pandion) re same; discussion with M. McKie re various issues and next steps for directions from Court, sale process and claim in Finland proceedings.	1,331.00
Feb 23, 2022	L. Hiebert	0.30	Emails with W. Stransky (counsel to Brunswick) re deleted records.	181.50
Feb 24, 2022	L. Hiebert	2.90	Emails with R. Morse (counsel to Otso) and M. Buttery (counsel to Pandion) re timeline and process for determining Pandion debt; emails with T. Dillenseger (A&M) re Westech services; call with D. Matthews (potential bidder's counsel) and M. McKie re potential transaction; consider sale process issues and revise tender document and form of LOI; discussions with M. McKie re sale process issues; emails with BLG mining group re potentially interested bidders; finalize form of LOI and email to M. McKie and N. McGregor re sale process.	1,754.50
Feb 24, 2022	L. Hiebert	0.20	Email to W. Stransky re deleted records.	121.00
Feb 25, 2022	L. Hiebert	1.60	Emails with M. McKie re issues for sale process; call with R. Morse (counsel to Otso) re issues for resolving Pandion debt issue and records; consider issues re Westech contract and emails re same.	968.00
Feb 25, 2022	L. Hiebert	0.60	Call from B. Hicks (counsel to Kroll) re position on records and email re same.	363.00



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April 4, 2022

Invoice # 698094978

File No: 560836/000013

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Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

Feb 27, 2022	L. Hiebert	0.30	Email from W. Stransky (counsel for Brunswick) re deleted records and emails with M. McKie and N. McGregor re same.	181.50
Feb 27, 2022	L. Hiebert	2.20	Review and consider emails and history of discussions with Kroll; assessment of costs proposed by Kroll and basis for same.	1,331.00
Feb 28, 2022	L. Hiebert	1.70	Emails re Westech contract issues and consider same; correspondence to PwC re return of retainer; call with M. Buttery, M. Burris and J. Enns (counsel to Pandion) re issues for resolution of debt and other issues for restructuring; call with M. McKie re Westech issue; call with V. Tickle (counsel to Westech) re issues for contract; emails re sale process.	1,028.50
Feb 28, 2022	L. Hiebert	1.00	Email from W. Stransky (counsel to Brunswick) re deleted records and call with M. McKie re same; review and consider draft order from W. Stransky re deleted records; email to W. Stransky.	605.00
Feb 28, 2022	L. Hiebert	1.00	Discussion with M. McKie re response to Kroll position on costs and consider access to records; consider response to Kroll and prepare response to B. Hicks re same.	605.00

TO OUR FEES

\$ 55,141.50

FEE SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Avg. Rate/Hr.</u>	<u>Amount</u>
C. Hansen	0.90	\$ 225.00	\$ 202.50
L. Hiebert	83.30	605.00	50,396.50
J. Pepper	10.70	395.00	4,226.50

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 Re: Otso Gold Receivership

April 4, 2022  
 Invoice # 698094978  
 File No: 560836/000013  
 Page 13

M.C. Verbrugge	0.40	790.00	316.00
	<u>95.30</u>		<u>\$ 55,141.50</u>

DISBURSEMENTS AND OTHER CHARGES:

<u>Taxable</u>	G=GST; Q=QST; H=HST; P=PST		
Courier		\$64.53	G
Court Transcripts		<u>251.45</u>	G
Total Taxable Disbursements and Other Charges		<u>315.98</u>	
Total Disbursements and Other Charges			315.98
Total Fees and Disbursements and Other Charges			<u>55,457.48</u>
GST on Fees and Taxable Disbursements and Other Charges			2,772.88
PST on Fees and Taxable Disbursements and Other Charges			<u>3,859.91</u>
TOTAL THIS INVOICE			<u><u>\$ 62,090.27</u></u>



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Invoice # 698094978  
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Re: Otso Gold Receivership

File No: 560836/000013

**REMITTANCE COPY**

Fees	\$ 55,141.50
Disbursements and Other Charges	315.98
GST on Fees and Taxable Disbursements and Other Charges	2,772.88
PST on Fees and Taxable Disbursements and Other Charges	3,859.91
	<hr/>
Total this Invoice	<b><u>\$ 62,090.27</u></b>

PLEASE REFER TO PAYMENT OPTIONS PAGE FOR REMITTANCE INFORMATION.



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Use one of the following payment methods and ensure your payment contains the details provided in the example.

Client Name	Client #	Invoice #	Amount	Comments
Deloitte Restructuring Inc.	560836	698094978	62,090.27 (CAD)	Payment for Invoice # 698094978

**Payment method # 1 - EFT/WIRE (Preferred Method)**

<b>Beneficiary Customer:</b> Borden Ladner Gervais, LLP Bay Adelaide Centre, East Tower 22 Adelaide Street West Toronto, ON, Canada M5H 4E3	<b>Beneficiary Bank:</b> Canadian Clearing Code: //CC000247696 Bank of Nova Scotia PO Box 4234 STN A Toronto, ON, Canada M5W 5P6
<b>Payments Originating from Canada or International Locations (Excluding US Dollars):</b> 12 Digit Account #: 80002 14221 11 Bank #: 002 Transit #: 80002 Swift Code: NOSCCATT	<b>Payments Originating in US Dollars:</b> ACH payments are not accepted 12 Digit Account #: 80002 51181 15 Bank #: 002 Transit #: 80002 Swift Code: NOSCCATT  <b>Intermediary Bank (If required):NOTE: do not use intermediary bank as the beneficiary bank</b> Bank of America NA 222 Broadway New York, N.Y. Swift Code: BOFAUS3N 10038 United States ABA #: 026009593

**Payment method # 2 - ONLINE PAYMENTS, CANADIAN FUNDS ONLY**

You may pay your invoice(s) to BLG through participating Canadian financial institution's online banking.

1. As a bill payment - Select **Borden Ladner Gervais** through your financial institution and enter your client # **560836**
2. As an Interac e-transfer - Add BLG's e-transfer email address [etransfers@blg.com](mailto:etransfers@blg.com) and enter the amount. No security question is required as BLG is Auto Deposit only. \*Note: your financial institution must support the Auto Deposit function.

**Remittance email required:** For payment methods #1 and #2 a payment confirmation must be sent by email to [remittanceadvice@blg.com](mailto:remittanceadvice@blg.com) and referencing your client number and invoice(s) paid.

**Payment method # 3 - CHEQUES**

**Send by mail:**

Borden Ladner Gervais, LLP  
 World Exchange Plaza  
 100 Queen Street, Suite 1300  
 Ottawa, ON, Canada K1P 1J9

Attach remittance details with payment and reference invoice(s) paid.

**Send by courier:**

Borden Ladner Gervais, LLP  
 World Exchange Plaza  
 100 Queen Street, Suite 1000  
 Ottawa, ON, Canada K1P 1J9

For additional information contact [cashreceiptscoe@blg.com](mailto:cashreceiptscoe@blg.com) OR (613) 369-4777

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April 4, 2022

Attention: Melinda McKie

Invoice # 698095276  
 Page 1

Re: Otso Gold Receivership

File No: 560836/000013

PROFESSIONAL SERVICES rendered to March 31, 2022 in connection with the above matter as described in the attached.

Fees	\$ 27,790.00
Less Discount	(2,500.00)
Fee Balance	<u>25,290.00</u>
Disbursements and Other Charges	36.00
GST on Fees and Taxable Disbursements and Other Charges	1,266.30
PST on Fees and Taxable Disbursements and Other Charges	<u>1,770.30</u>
Total this Invoice	<u><u>\$ 28,362.60</u></u>

THIS IS OUR ACCOUNT - E. & O.E.

**BORDEN LADNER GERVAIS LLP**

For: Lisa Hiebert



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Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

April 4, 2022  
 Invoice # 698095276  
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 Page 2

PROFESSIONAL SERVICES RENDERED to March 31, 2022

Mar 1, 2022	L. Hiebert	0.30	Emails re extension of stay of proceedings in Sweden; emails re entered order; correspondence from M. Buttery (counsel for Pandion) re process for determining Pandion debt and consider issues arising from same.	\$ 181.50
Mar 1, 2022	L. Hiebert	0.30	Email to B. Hicks (counsel to Kroll) re records issues; email from R. Morse (counsel to Otso) re post-receivership discussions with Kroll.	181.50
Mar 1, 2022	L. Hiebert	0.70	Email from W. Stransky (counsel to Brunswick) re issues for deleted records and call with M. McKie re same.	423.50
Mar 2, 2022	L. Hiebert	3.20	Consider proposal from W. Stransky (counsel to Brunswick) re deleted records and consider issues for same; call with W. Stransky, R. Morse (counsel to Otso), M. McKie and N. McGregor re deleted records; consider revised proposal from Brunswick arising from call; prepare response to Brunswick proposal regarding deleted records and consider issues for same.	1,936.00
Mar 3, 2022	L. Hiebert	0.30	Emails re extension of stay in Sweden and Otso Gold Corp. claim against Otso OY and Otso OB.	181.50
Mar 3, 2022	L. Hiebert	0.50	Email to W. Stransky (counsel to Brunswick) re Receiver's position on deleted records and consider same.	302.50
Mar 4, 2022	L. Hiebert	0.20	Call with M. McKie re report and issues for same.	121.00
Mar 7, 2022	L. Hiebert	0.70	Email from J. Carhart (counsel to Kroll) re request for instructions and position on costs; consider issues arising from J. Carhart email; email to J. Carhart clarify instructions to Kroll.	423.50

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Page 3

Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

Mar 7, 2022	L. Hiebert	0.30	Responding to stakeholder inquiries; email to V. Tickle (counsel to Westech) re contract issues.	181.50
Mar 8, 2022	L. Hiebert	0.20	Emails with M. McKie re Westech issues; email from Omni Bridgeway re litigation funding and consider issues for same.	121.00
Mar 8, 2022	L. Hiebert	0.40	Email from M. Buttery (counsel to Pandion) re letter rogatory and review documents for same; email to M. Buttery re letter rogatory; email to M. McKie re letter rogatory.	242.00
Mar 9, 2022	L. Hiebert	0.70	Emails with M. McKie and N. McGregor re Westech contract issues; emails with M. McKie re issues for sale process and consider same; email to V. Tickle (counsel to Westech) re contract issues and CCAA Consent Order.	423.50
Mar 10, 2022	L. Hiebert	0.70	Call with V. Tickle (counsel to Westech) re contract issues and email to M. McKie re same; consider modifications to consent order.	423.50
Mar 11, 2022	L. Hiebert	1.30	Emails with M. McKie and L. Purlund re Westech arrangements; email to V. Tickle (counsel to Westech) re modification of CCAA consent order and consider same; emails with L. Moher (PwC) re return of retainer and questions re same; call with Omni Bridgeway re litigation funding options; emails with V. Tickle re arrangements for Westech contract and consider issues arising from same; emails and call with M. McKie re various issues and arrangements.	786.50

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Page 4

Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

Mar 11, 2022	L. Hiebert	0.90	Email from B. Hicks (counsel to Kroll) re Kroll communications with Brunswick and updated proposal; discussion with M. McKie re issues raised by Kroll; email to B, Hicks; email to W. Stransky (counsel to Brunswick) re communications with Kroll.	544.50
Mar 14, 2022	L. Hiebert	0.10	Emails with M. McKie and Otso OY re Westech contract issues.	60.50
Mar 15, 2022	L. Hiebert	1.80	Call with N. Levine and J. Enns (counsel to Pandion) re status and next steps; call with M. McKie re various issues for sale process, recovery of funds and other issues and next steps; emails re sale process issues.	1,089.00
Mar 16, 2022	L. Hiebert	0.30	Emails with L. Moher (PwC) re retainer; emails re sale process.	181.50
Mar 17, 2022	L. Hiebert	0.40	Consider Westech contract issues and email to V. Tickle (counsel to Westech) re same.	242.00
Mar 18, 2022	L. Hiebert	0.10	Email from W. Stransky (counsel to Brunswick) re discussions with Kroll for access.	60.50
Mar 18, 2022	L. Hiebert	0.50	Consider issues for sale process and documents required for same.	302.50
Mar 22, 2022	L. Hiebert	0.50	Review and consider PwC invoice; emails re sale process and consider issues for same; consider issues for APA and emails re same.	302.50
Mar 22, 2022	R.M. Laity	4.70	Review correspondence re: asset purchase agreement; consider form of agreement and review NOI received; draft form of asset purchase agreement; consider closing mechanics and need for separate bill of sale;	2,632.00
Mar 23, 2022	C. Hansen	0.20	Update service list with new information.	45.00
Mar 23, 2022	L. Hiebert	0.30	Consider issues re sale process and APA; emails re creditor notices.	181.50
Mar 23, 2022	R.M. Laity	1.90	Review/revise form of APA; correspondence re: same;	1,064.00

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Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

Mar 24, 2022	L. Hiebert	1.00	Review and consider draft purchase agreement; emails re sale process and transaction issues and consider same.	605.00
Mar 25, 2022	L. Hiebert	0.90	Consider issues for sale approval and APA for same; call with M. McKie and N. McGregor re offers received and next steps.	544.50
Mar 26, 2022	K.D. Kufeldt	1.30	Review and comment on APA	1,261.00
Mar 27, 2022	K.D. Kufeldt	1.30	Review and revise asset purchase agreement	1,261.00
Mar 28, 2022	B.J. Gilbert	0.90	GST/PST: review doc #128196668v3 - Form of Asset Purchase Agreement (Receivership); research issues and provide guidance to	792.00
Mar 28, 2022	L. Hiebert	3.10	Consider issues for APA and revisions to same; discussion with D. Lewchuk re tax issues for APA; call with M. BATTERY (counsel to Pandion) re sale process issues and proposed next steps for same; emails re issues arising from foreign insolvency proceedings; call with M. McKie re status and next steps for sale process and other restructuring issues.	1,875.50
Mar 28, 2022	K.D. Kufeldt	0.30	Review asset purchase agreement	291.00
Mar 28, 2022	D. Lewchuk	3.70	Receive instructions from partner; review file materials; conference with partner; review and revise transaction document; draft email correspondence.	2,090.50
Mar 28, 2022	R. Morphy	0.30	Review APA; confer with D. Lewchuk re: tax issues.	261.00
Mar 29, 2022	L. Hiebert	2.40	Consider issues for APA and sale transaction; revisions to APA; arrangements for mineral title searches; review and revise approval and vesting order; call with Scheduling re timing for application to approve sale; emails with M. BATTERY (counsel to Pandion) re sale process for proposed transaction and issues for same.	1,452.00

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April 4, 2022

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Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

Mar 29, 2022	P.G. Hurst	0.60	Review and instruct clerks re: due diligence searches required to confirm mineral titles.	327.00
Mar 29, 2022	C. Lopes	0.30	Receive lawyer instructions; obtain online corporate searches from BC Corporate Registry for Firesteel Resources Inc. (current name Otso Gold Corp) and Prosper Gold Corp.; review search results and send to legal team for next steps.	64.50
Mar 29, 2022	J. Pepper	1.90	Review Asset Purchase Agreement and Court Order; Draft Approval and Vesting Order and Receiver's Certificate	750.50
Mar 29, 2022	P.J. Sugimoto	0.20	Review instructions regarding insolvency matter including list of mineral titles; conduct Mineral Title Registry online search to provide instructions for producing title reports and map prints of mineral areas.	53.00
Mar 30, 2022	C.A. Connor	0.10	Instructions from L. Hiebert re request to appear concerning application seeking approval of a sale transaction for certain assets.	30.50
Mar 30, 2022	L. Hiebert	2.10	Review and consider Mineral Title Searches and revise APA and Vesting Order re same; emails with M. Buttery (counsel to Pandion) re proposed transaction; call with M. McKie re transaction and next steps re same; emails re draft materials to conclude transaction; discussion with J. Pepper re issues for sale approval application.	1,270.50
Mar 30, 2022	P.G. Hurst	1.10	Review the mineral title results; consider title issues; confer with P. Sugimoto.	599.50

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Mar 30, 2022	C. Lopes	3.60	Receive lawyer instructions; obtain Mineral Title Reports and Mineral Maps from the BC Mineral Title Branch for each of the 19 mineral titles listed in the legal team email correspondence; create updated Mineral Titles table to include registered owners and percentage of interest for each mineral title; obtain further Mineral Title Reports for several corporate entities (Otso Gold Corp, Nordic Gold Corp, Nordic Gold Inc, 510438 Alberta Ltd and Firesteel Resources Inc) pull any further title information if applicable and summarize findings with search results to legal team for review and next steps.	774.00
Mar 30, 2022	P.J. Sugimoto	0.40	Review mineral title search results and related corporate records; conduct online Corporate Registry search to review and obtain change of name certificate.	106.00
Mar 31, 2022	C.A. Connor	0.80	Instructions from L. Hiebert. Consider utilizing File Transfer Server to upload upcoming application materials. Complete and submit Request to Appear online form concerning application seeking approval of a sale transaction for certain assets and email same to counsel and individuals on Service List. Revise Service List.	244.00
Mar 31, 2022	L. Hiebert	0.70	Arrangements for scheduling of sale approval hearing; emails with stakeholders re upcoming application; consider issues for sale approval application.	423.50
Mar 31, 2022	J. Pepper	0.20	Review email correspondence re: request to appear and application record; Consider next steps and drafting application for order approving sale	79.00



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 Page 8

TO OUR FEES	\$ 27,790.00
Less Discount	(2,500.00)
FEE BALANCE	<u>25,290.00</u>

FEE SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Avg. Rate/Hr.</u>	<u>Amount</u>
C.A. Connor	0.90	\$ 277.57	\$ 249.81
B.J. Gilbert	0.90	800.83	720.75
C. Hansen	0.20	204.75	40.95
L. Hiebert	24.90	550.57	13,709.31
P.G. Hurst	1.70	495.97	843.15
K.D. Kufeldt	2.90	882.74	2,559.94
R.M. Laity	6.60	509.62	3,363.50
D. Lewchuk	3.70	514.17	1,902.44
C. Lopes	3.90	195.66	763.07
R. Morphy	0.30	791.73	237.52
J. Pepper	2.10	359.46	754.87
P.J. Sugimoto	0.60	241.15	144.69
	<u>48.70</u>		<u>\$ 25,290.00</u>

DISBURSEMENTS AND OTHER CHARGES:

<u>Taxable</u>	G=GST; Q=QST; H=HST; P=PST	
BC Online		\$28.00 G
BC Online Service Charge		<u>8.00 G</u>
Total Taxable Disbursements and Other Charges		<u>36.00</u>
Total Disbursements and Other Charges		36.00

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Page 9

Total Fees and Disbursements and Other Charges	25,326.00
GST on Fees and Taxable Disbursements and Other Charges	1,266.30
PST on Fees and Taxable Disbursements and Other Charges	1,770.30
<b>TOTAL THIS INVOICE</b>	<b>\$ 28,362.60</b>



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April 4, 2022  
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LH/LH

Re: Otso Gold Receivership

File No: 560836/000013

**REMITTANCE COPY**

Fees	\$ 27,790.00
Less Discount	(2,500.00)
Fee Balance	<u>25,290.00</u>
Disbursements and Other Charges	36.00
GST on Fees and Taxable Disbursements and Other Charges	1,266.30
PST on Fees and Taxable Disbursements and Other Charges	<u>1,770.30</u>
Total this Invoice	<u><b>\$ 28,362.60</b></u>

PLEASE REFER TO PAYMENT OPTIONS PAGE FOR REMITTANCE INFORMATION.



Borden Ladner Gervais LLP  
 Lawyers | Patent & Trade-mark Agents  
 1200 Waterfront Centre  
 200 Burrard St, P.O. Box 48600  
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 blg.com

Deloitte Restructuring Inc.  
 939 Granville Street  
 Vancouver, BC V6Z 1L3

April 4, 2022  
 Invoice # 698095276  
 LH/LH

Use one of the following payment methods and ensure your payment contains the details provided in the example.

Client Name	Client #	Invoice #	Amount	Comments
Deloitte Restructuring Inc.	560836	698095276	28,362.60 (CAD)	Payment for Invoice # 698095276

**Payment method # 1 - EFT/WIRE (Preferred Method)**

<b>Beneficiary Customer:</b> Borden Ladner Gervais, LLP Bay Adelaide Centre, East Tower 22 Adelaide Street West Toronto, ON, Canada M5H 4E3	<b>Beneficiary Bank:</b> Canadian Clearing Code: //CC000247696 Bank of Nova Scotia PO Box 4234 STN A Toronto, ON, Canada M5W 5P6
<b>Payments Originating from Canada or International Locations (Excluding US Dollars):</b> 12 Digit Account #: 80002 14221 11 Bank #: 002 Transit #: 80002 Swift Code: NOSCCATT	<b>Payments Originating in US Dollars:</b> ACH payments are not accepted 12 Digit Account #: 80002 51181 15 Bank #: 002 Transit #: 80002 Swift Code: NOSCCATT  <b>Intermediary Bank (If required):NOTE: do not use intermediary bank as the beneficiary bank</b> Bank of America NA 222 Broadway New York, N.Y. Swift Code: BOFAUS3N 10038 United States ABA #: 026009593

**Payment method # 2 - ONLINE PAYMENTS, CANADIAN FUNDS ONLY**

You may pay your invoice(s) to BLG through participating Canadian financial institution's online banking.

- As a bill payment - Select **Borden Ladner Gervais** through your financial institution and enter your client # **560836**
- As an Interac e-transfer - Add BLG's e-transfer email address [etransfers@blg.com](mailto:etransfers@blg.com) and enter the amount. No security question is required as BLG is Auto Deposit only. \*Note: your financial institution must support the Auto Deposit function.

**Remittance email required:** For payment methods #1 and #2 a payment confirmation must be sent by email to [remittanceadvice@blg.com](mailto:remittanceadvice@blg.com) and referencing your client number and invoice(s) paid.

**Payment method # 3 - CHEQUES**

**Send by mail:**

Borden Ladner Gervais, LLP  
 World Exchange Plaza  
 100 Queen Street, Suite 1300  
 Ottawa, ON, Canada K1P 1J9

**Send by courier:**

Borden Ladner Gervais, LLP  
 World Exchange Plaza  
 100 Queen Street, Suite 1000  
 Ottawa, ON, Canada K1P 1J9

Attach remittance details with payment and reference invoice(s) paid.

For additional information contact [cashreceiptscoe@blg.com](mailto:cashreceiptscoe@blg.com) OR (613) 369-4777

PAYABLE ON RECEIPT  
 INTEREST AT THE RATE OF 12.0% PER ANNUM MAY BE CHARGED ON ACCOUNTS WHICH ARE OVERDUE  
**GST/HST REGISTRATION # R869096974RT0005**





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Deloitte Restructuring Inc.  
 939 Granville Street  
 Vancouver, BC V6Z 1L3

May 17, 2022

Attention: Melinda McKie

Invoice # 698112505  
 Page 1

Re: Otso Gold Receivership

File No: 560836/000013

PROFESSIONAL SERVICES rendered to April 30, 2022 in connection with the above matter as described in the attached.

Fees	\$ 26,529.50
Less Discount	(2,500.00)
Fee Balance	<u>24,029.50</u>
Disbursements and Other Charges	355.50
GST on Fees and Taxable Disbursements and Other Charges	1,212.91
PST on Fees and Taxable Disbursements and Other Charges	<u>1,682.07</u>
Total this Invoice	<u><u>\$ 27,279.98</u></u>

THIS IS OUR ACCOUNT - E. & O.E.

**BORDEN LADNER GERVAIS LLP**

For: Lisa Hiebert



Borden Ladner Gervais LLP  
 Lawyers | Patent & Trade-mark Agents  
 1200 Waterfront Centre  
 200 Burrard St, P.O. Box 48600  
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Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

May 17, 2022  
 Invoice # 698112505  
 File No: 560836/000013  
 Page 2

PROFESSIONAL SERVICES RENDERED to April 30, 2022

Apr 1, 2022	L. Hiebert	1.20	Emails with Court and stakeholders re timing for sale approval application; review and consider revised Purchase Agreement and consider issues for same; emails with Purchaser's counsel re issues for Purchase Agreement; discussion with M.McKie re issues and next steps for sale approval.	\$ 726.00
Apr 1, 2022	K.D. Kufeldt	0.60	Review APA comments, legal discussion with L. Hiebert.	582.00
Apr 1, 2022	J. Pepper	0.90	Draft Application for Order Approving Sale	355.50
Apr 3, 2022	L. Hiebert	0.80	Review and comment on draft report and consider issues for same.	484.00
Apr 4, 2022	L. Hiebert	3.50	Finalize APA and arrangements for execution of same; review and revise application for sale approval and consider issues for same; review and consider revised report and consider issues for same; call and emails with purchaser; emails with stakeholders re upcoming hearing, call with M. McKie re issues for upcoming application and Report; review and revise form of vesting order.	2,117.50
Apr 4, 2022	J. Pepper	1.70	Draft BLG affidavit; Consider currency dates of searches; Coordinate updated corporate and PPR searches; Update and compile final version of affidavit;	671.50
Apr 5, 2022	L. Hiebert	1.70	Review and revise report; review and finalize application to approve sale; call with M. McKie re strategic issues and next steps; review and revise form of order; consider issues for upcoming application.	1,028.50
Apr 5, 2022	J. Pepper	2.00	Draft sale approval application package; Create comparison document to model order; Review email correspondence re: application filing/application record	790.00

PAYABLE ON RECEIPT  
 INTEREST AT THE RATE OF 12.0% PER ANNUM MAY BE CHARGED ON ACCOUNTS WHICH ARE OVERDUE  
**GST/HST REGISTRATION # R869096974RT0005**



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Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

May 17, 2022  
 Invoice # 698112505  
 File No: 560836/000013  
 Page 3

Apr 5, 2022	V. Smith	0.20	Receive instructions from A. Estrada. Attendance to obtain Alberta PPR and corporate searches for Otso Gold Corp. Send via email.	55.00
Apr 6, 2022	C.A. Connor	3.20	Instructions from L. Hiebert. Consider precedents and communications from Supreme Court Scheduling concerning upload of application materials to the file transfer server to aid out of town judiciary access. Prepare draft indexed Application Record (unfiled materials) and Book of Authorities, with caselaw hyperlinks, concerning order re vesting and sale, ensuring all materials are searchable to upload to file transfer server.	976.00
Apr 6, 2022	L. Hiebert	2.10	Review and consider pledge notice received from Pandion; consider issues re upcoming sale approval application; consider final form of Report for upcoming application; finalize application and arrangements for hearing; call with Scheduling re issues for upcoming hearing.	1,270.50
Apr 6, 2022	J. Pepper	2.50	Review Receiver's Report and BLG Invoices; Draft fee approval application materials; Review application record for Order Approving Sale;	987.50
Apr 7, 2022	C.A. Connor	0.80	Instructions from L. Hiebert. Receive filed application materials and finalize Application Record and Book of Authorities, with caselaw hyperlinks and pinpoint bookmarks, concerning order re vesting and sale, reconfirming materials are searchable to upload to file transfer server.	244.00



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Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

May 17, 2022  
 Invoice # 698112505  
 File No: 560836/000013  
 Page 4

Apr 7, 2022	L. Hiebert	1.30	Emails with T. Louman-Gardiner (counsel to Otso) re request for confidential information and discussion with M. McKie re same; emails with T. Louman-Gardiner re potential terms for disclosure; consider issues for sale approval application.	786.50
Apr 7, 2022	J. Pepper	6.10	Draft fee approval application materials; Follow up with Receiver regarding invoices;	2,409.50
Apr 8, 2022	C.A. Connor	0.50	Create application folder and upload Application Record and Book of Authorities to Supreme Court File Transfer Server and test same.	152.50
Apr 8, 2022	L. Hiebert	1.70	Emails with T. Louman-Gardiner (counsel to Otso Gold) re confidential information for sale approval application; consider issues arising from Otso positions and emails with M. McKie re same; call with M. Buttery (counsel to Pandion) re issues for sale approval application and notice delivered by Pandion; email from V. Tickle (counsel to Westech) re contract issues and terms for go-forward arrangement; review and revise materials for activity and fee approval.	1,028.50
Apr 8, 2022	L. Hiebert	0.10	Email from V. Tickle (counsel to Lionsbridge) re deleted records issue.	60.50
Apr 8, 2022	J. Pepper	0.20	Review email correspondence regarding application record for Order Approving Sale; Update Fee Approval application materials; Discussion regarding timeline of hearing	79.00



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Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

May 17, 2022  
 Invoice # 698112505  
 File No: 560836/000013  
 Page 5

Apr 11, 2022	L. Hiebert	3.60	Emails and call with T. Louman-Gardiner (counsel to Otso) re issues for sale approval application and discussions to narrow issues; various emails with stakeholders re upcoming application; emails re Pandion security notice and consider issues arising from same; prepare for sale approval application and consider issues for same; emails with creditor re claim for payment and distribution issues for same.	2,178.00
Apr 11, 2022	J. Pepper	0.50	Update orders with service list.	197.50
Apr 12, 2022	L. Hiebert	3.10	Prepare for and attend application to approve transaction; emails with L. Purlund (Otso OY CRO) and M. McKie re status of Finland proceedings and next steps for same; emails and call with D. Matthews (counsel to purchaser) re logistics and issues for closing transaction; arrangements for closing of transaction; discussion with Court registry re expediting entry of orders.	1,875.50
Apr 12, 2022	R.M. Laity	0.20	Review correspondence re: mine sale; consider same.	112.00
Apr 12, 2022	J. Pepper	1.10	Organize materials for hearing; Circulate hearing link; Attend hearing; Review email correspondence regarding status of orders/filing.	434.50
Apr 13, 2022	L. Hiebert	1.00	Arrangements for closing of transaction and various emails with purchaser and M. McKie re same; arrangements for certification of vesting order and entry of sealing order.	605.00
Apr 13, 2022	J. Pepper	1.00	Consider status of orders and next steps on file; Review email correspondence regarding status of file; Draft Letter to the Mineral Titles Office.	395.00



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May 17, 2022

Invoice # 698112505

File No: 560836/000013

Page 6

Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

Apr 14, 2022	L. Hiebert	1.70	Numerous emails with purchaser re issues for closing and consider issues for same; arrangements for documents for closing and consider same; email to K. McEwan and W. Stransky (counsel to Brunswick) re Brunswick queries to Finnish receiver.	1,028.50
Apr 14, 2022	R.M. Laity	0.20	Review correspondence re: closing payment and transfer hold; consider same.	112.00
Apr 14, 2022	J. Pepper	0.60	Circulate documents to the service list; Review email correspondence regarding fund transfers; Consider issue with hold on funds; Consider next steps on file and filing of sealing order.	237.00
Apr 19, 2022	L. Hiebert	0.40	Various emails re closing of transaction and arrangements for same.	242.00
Apr 19, 2022	R.M. Laity	0.70	Various correspondence re: transaction closing; consider same.	392.00
Apr 19, 2022	J. Pepper	4.30	Review email correspondence regarding status of order; Circulate updated Slip Rule Order to Service List and Purchaser's counsel; Consider wire transfer status; Consider status of closing with Receiver; Compile and circulate closing documents; Consider address of Mineral Titles Office; Update signatory on bill of sale; Prepare materials for filing; Draft Requisition for Receiver's Certificate; File Receiver's Certificate and Sealing Order with the Court; Circulate update on transaction, Receiver's Certificate and Sealing Order to Service List and Purchaser's Counsel; Follow up with Purchaser's counsel regarding payment of fees for Mineral Title Letter.	1,698.50
Apr 20, 2022	J. Pepper	0.10	Correspondence regarding slip rule order and funds transfer.	39.50
Apr 25, 2022	L. Hiebert	0.10	Emails re Westech contract issues.	60.50

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**GST/HST REGISTRATION # R869096974RT0005**



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Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

May 17, 2022  
 Invoice # 698112505  
 File No: 560836/000013  
 Page 7

Apr 25, 2022	L. Hiebert	0.80	Email from B. Hicks (Kroll counsel) re proposed agreement with Kroll and Brunswick for deleted emails; review and consider draft agreement from Kroll; email to M. McKie re proposal from Kroll/Brunswick.	484.00
Apr 26, 2022	L. Hiebert	0.60	Call with M. McKie re proposal from Kroll/Brunswick; emails with B. Hicks re proposal from Kroll and issues arising from same.	363.00
Apr 27, 2022	L. Hiebert	1.20	Emails and discussion with M. McKie re response from Kroll and consider issues for same; review and consider further Kroll invoice delivered to Otso; prepare response to Kroll re issues raised.	726.00
Apr 28, 2022	L. Hiebert	0.30	Emails with J. Verbaas and Mineral Title Branch re information required to transfer titles.	181.50
Apr 28, 2022	L. Hiebert	0.40	Email to with B. Hicks (counsel to Kroll) re document issues.	242.00
Apr 29, 2022	L. Hiebert	0.20	Emails with L. Moher (PwC counsel) re request for records and consider issues for same.	121.00

TO OUR FEES	\$ 26,529.50
Less Discount	(2,500.00)
<b>FEE BALANCE</b>	<b>24,029.50</b>

FEE SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Avg. Rate/Hr.</u>	<u>Amount</u>
C.A. Connor	4.50	\$ 276.26	\$ 1,243.17

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May 17, 2022

Invoice # 698112505

File No: 560836/000013

Page 8

Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

L. Hiebert	25.80	547.99	14,138.06
K.D. Kufeldt	0.60	878.60	527.16
R.M. Laity	1.10	507.24	557.96
J. Pepper	21.00	357.78	7,513.33
V. Smith	0.20	249.10	49.82
	<u>53.20</u>		<u>\$ 24,029.50</u>

DISBURSEMENTS AND OTHER CHARGES:

Non-Taxable

Agent's Account	\$120.00
BC Online	7.00
	<u>127.00</u>

Total Non-Taxable Disbursements and Other Charges 127.00

Taxable

G=GST; Q=QST; H=HST; P=PST

Agent's Account	18.00	G
BC Online	14.00	G
BC Online Service Charge	4.00	G
Corporate Registry Search	7.00	G
PPSA Searches	3.00	G
Remote Database Fee	2.00	G
Trust Administration Fee	15.00	G
Agency Fees - West Coast Title Search: Court filing ordered by Atkinson, Kim L.	43.50	G
Agency Fees - West Coast Title Search: Court filing ordered by Trafford, Kate	42.00	G
Agency Fees - West Coast Title Search: Court Filing ordered by Atkinson, Kim L.	46.00	G
Agency Fees - West Coast Title Search: Court Filing ordered by Atkinson, Kim L.	34.00	G
	<u>228.50</u>	

Total Taxable Disbursements and Other Charges 228.50

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**GST/HST REGISTRATION # R869096974RT0005**





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Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

May 17, 2022  
 Invoice # 698112505  
 File No: 560836/000013  
 Page 9

Total Disbursements and Other Charges	355.50
Total Fees and Disbursements and Other Charges	<u>24,385.00</u>
GST on Fees and Taxable Disbursements and Other Charges	1,212.91
PST on Fees and Taxable Disbursements and Other Charges	<u>1,682.07</u>
<b>TOTAL THIS INVOICE</b>	<b><u>\$ 27,279.98</u></b>



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blg.com

Deloitte Restructuring Inc.  
939 Granville Street  
Vancouver, BC V6Z 1L3

May 17, 2022  
Invoice # 698112505  
LH/LH

Re: Otso Gold Receivership

File No: 560836/000013

**REMITTANCE COPY**

Fees	\$ 26,529.50
Less Discount	(2,500.00)
Fee Balance	<u>24,029.50</u>
Disbursements and Other Charges	355.50
GST on Fees and Taxable Disbursements and Other Charges	1,212.91
PST on Fees and Taxable Disbursements and Other Charges	<u>1,682.07</u>
Total this Invoice	<u><b>\$ 27,279.98</b></u>

PLEASE REFER TO PAYMENT OPTIONS PAGE FOR REMITTANCE INFORMATION.



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Deloitte Restructuring Inc.  
 939 Granville Street  
 Vancouver, BC V6Z 1L3

May 17, 2022  
 Invoice # 698112505  
 LH/LH

Use one of the following payment methods and ensure your payment contains the details provided in the example.

Client Name	Client #	Invoice #	Amount	Comments
Deloitte Restructuring Inc.	560836	698112505	27,279.98 (CAD)	Payment for Invoice # 698112505

**Payment method # 1 - EFT/WIRE (Preferred Method)**

<b>Beneficiary Customer:</b> Borden Ladner Gervais, LLP Bay Adelaide Centre, East Tower 22 Adelaide Street West Toronto, ON, Canada M5H 4E3	<b>Beneficiary Bank:</b> Canadian Clearing Code: //CC000247696 Bank of Nova Scotia PO Box 4234 STN A Toronto, ON, Canada M5W 5P6
<b>Payments Originating from Canada or International Locations (Excluding US Dollars):</b> <b>12 Digit Account #:</b> 80002 14221 11 <b>Bank #:</b> 002 <b>Transit #:</b> 80002 <b>Swift Code:</b> NOSCCATT	<b>Payments Originating in US Dollars:</b> <b>ACH payments are not accepted</b> <b>12 Digit Account #:</b> 80002 51181 15 <b>Bank #:</b> 002 <b>Transit #:</b> 80002 <b>Swift Code:</b> NOSCCATT  <b>Intermediary Bank (If required):NOTE: do not use intermediary bank as the beneficiary bank</b> Bank of America NA 222 Broadway New York, N.Y. <b>Swift Code:</b> BOFAUS3N 10038 United States <b>ABA #:</b> 026009593

**Payment method # 2 - ONLINE PAYMENTS, CANADIAN FUNDS ONLY**

You may pay your invoice(s) to BLG through participating Canadian financial institution's online banking.  
 1. **As a bill payment** - Select **Borden Ladner Gervais** through your financial institution and enter your client # **560836**  
 2. **As an Interac e-transfer** - Add BLG's e-transfer email address [etransfers@blg.com](mailto:etransfers@blg.com) and enter the amount. No security question is required as BLG is Auto Deposit only. \*Note: your financial institution must support the Auto Deposit function.  
**Remittance email required:** For payment methods #1 and #2 a payment confirmation must be sent by email to [remittanceadvice@blg.com](mailto:remittanceadvice@blg.com) and referencing your client number and invoice(s) paid.

**Payment method # 3 - CHEQUES**

<b>Send by mail:</b> Borden Ladner Gervais, LLP World Exchange Plaza 100 Queen Street, Suite 1300 Ottawa, ON, Canada K1P 1J9	<b>Send by courier:</b> Borden Ladner Gervais, LLP World Exchange Plaza 100 Queen Street, Suite 1000 Ottawa, ON, Canada K1P 1J9
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Attach remittance details with payment and reference invoice(s) paid.

For additional information contact [cashreceiptscoe@blg.com](mailto:cashreceiptscoe@blg.com) OR (613) 369-4777

PAYABLE ON RECEIPT  
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Deloitte Restructuring Inc.  
 939 Granville Street  
 Vancouver, BC V6Z 1L3

June 3, 2022

Attention: Melinda McKie

Invoice # 698118052  
 Page 1

Re: Otso Gold Receivership

File No: 560836/000013

PROFESSIONAL SERVICES rendered to May 31, 2022 in connection with the above matter as described in the attached.

Fees	\$ 5,790.50
Less Discount	(790.50)
Fee Balance	<u>5,000.00</u>
Disbursements and Other Charges	0.00
GST on Fees and Taxable Disbursements and Other Charges	250.00
PST on Fees and Taxable Disbursements and Other Charges	<u>350.00</u>
Total this Invoice	<u><u>\$ 5,600.00</u></u>

THIS IS OUR ACCOUNT - E. & O.E.

**BORDEN LADNER GERVAIS LLP**

For: Lisa Hiebert



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Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

June 3, 2022  
 Invoice # 698118052  
 File No: 560836/000013  
 Page 2

PROFESSIONAL SERVICES RENDERED to May 31, 2022

May 2, 2022	L. Hiebert	0.10	Emails with PwC re requests for records.	\$ 60.50
May 3, 2022	L. Hiebert	0.20	Emails with N. McGregor and L. Moher (PwC) re Otso records from PwC.	121.00
May 4, 2022	L. Hiebert	1.10	Emails with L. Moher (PwC) and N. McGregor re request for records and arrangements for same; correspondence from T. Louman-Gardiner (counsel to Otso) re CCAA administration charge; correspondence from T. Louman-Gardiner re sale process; consider issues arising from Otso positions and emails with M. McKie and N. McGregor re same.	665.50
May 5, 2022	L. Hiebert	0.10	Emails re post-closing issues.	60.50
May 9, 2022	L. Hiebert	0.70	Call with N. McGregor re various issues and response to stakeholder communications; emails with L. Moher (PwC) re document request; email from P. Jaatinen (Finland administrator) re status and next steps for Finland proceedings and sale process.	423.50
May 11, 2022	L. Hiebert	1.00	Consider issues arising from and response to stakeholder communications and status of foreign proceedings and call with M. McKie re same.	605.00
May 12, 2022	L. Hiebert	0.40	Email to L. Moher (PwC) re document requests; emails with L. Andersson (Swedish administrator) and M. McKie re issues for foreign proceedings and consider issues arising from same.	242.00
May 12, 2022	L. Hiebert	0.20	Email from W. Stransky (counsel to Brunswick) re deleted emails and consider issues arising from same; emails with M. McKie re request from Brunswick.	121.00
May 13, 2022	L. Hiebert	0.40	Discussion with M. McKie re document issues and emails with L. Moher (PwC) re same.	242.00

PAYABLE ON RECEIPT  
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Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

June 3, 2022  
 Invoice # 698118052  
 File No: 560836/000013  
 Page 3

May 16, 2022	L. Hiebert	0.20	Emails with L. Moher (PwC) and M. McKie re information required from PwC.	121.00
May 17, 2022	L. Hiebert	0.90	Emails re PwC records; prepare response to T. Louman-Gardiner (counsel to Otso) re sale approval application and consider issues for same; emails with M. Buttery (counsel to Pandion) re priority to proceeds issues raised by counsel to Otso.	544.50
May 18, 2022	J. Pepper	2.10	Review CCAA Consent Order; Draft Consent Order	829.50
May 19, 2022	L. Hiebert	1.20	Emails and call with W. Stransky (counsel to Brunswick), J. Carhart and B. Hicks (counsel to Kroll) and M. McKie re Kroll/Brunswick proposal for records; discussion with M. McKie re issues arising from same.	726.00
May 19, 2022	L. Hiebert	0.40	Discussion with M. McKie re various issues re foreign proceedings and next steps to preserve value.	242.00
May 20, 2022	L. Hiebert	0.30	Email to T. Louman-Gardiner (counsel to Otso) re sale process.	181.50
May 26, 2022	L. Hiebert	0.30	Review and revise consent order re Westech arrangements and email to V. Tickle re same.	181.50
May 26, 2022	L. Hiebert	0.50	Consider document issues arising from Brunswick/Kroll discussions and call with V. Tickle re status of records and potential access issues; consider response to Brunswick proposal.	302.50
May 30, 2022	L. Hiebert	0.20	Discussion with V. Tickle re potential sale of Otso OY; email from creditor.	121.00

TO OUR FEES	\$ 5,790.50
Less Discount	(790.50)
FEE BALANCE	<u>5,000.00</u>

PAYABLE ON RECEIPT  
 INTEREST AT THE RATE OF 12.0% PER ANNUM MAY BE CHARGED ON ACCOUNTS WHICH ARE OVERDUE

**GST/HST REGISTRATION # R869096974RT0005**



Borden Ladner Gervais LLP  
 Lawyers | Patent & Trade-mark Agents  
 1200 Waterfront Centre  
 200 Burrard St, P.O. Box 48600  
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 Re: Otso Gold Receivership

June 3, 2022  
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 File No: 560836/000013  
 Page 4

FEE SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Avg. Rate/Hr.</u>	<u>Amount</u>
L. Hiebert	8.20	\$ 522.41	\$ 4,283.74
J. Pepper	2.10	341.08	716.26
	<u>10.30</u>		<u>\$ 5,000.00</u>

Total Fees and Disbursements and Other Charges	<u>5,000.00</u>
GST on Fees and Taxable Disbursements and Other Charges	250.00
PST on Fees and Taxable Disbursements and Other Charges	<u>350.00</u>
<b>TOTAL THIS INVOICE</b>	<b><u>\$ 5,600.00</u></b>



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Deloitte Restructuring Inc.  
939 Granville Street  
Vancouver, BC V6Z 1L3

June 3, 2022  
Invoice # 698118052  
LH/LH

Re: Otso Gold Receivership

File No: 560836/000013

**REMITTANCE COPY**

Fees	\$ 5,790.50
Less Discount	(790.50)
Fee Balance	<u>5,000.00</u>
Disbursements and Other Charges	0.00
GST on Fees and Taxable Disbursements and Other Charges	250.00
PST on Fees and Taxable Disbursements and Other Charges	<u>350.00</u>
Total this Invoice	<u><b>\$ 5,600.00</b></u>

PLEASE REFER TO PAYMENT OPTIONS PAGE FOR REMITTANCE INFORMATION.





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Deloitte Restructuring Inc.  
 939 Granville Street  
 Vancouver, BC V6Z 1L3

June 3, 2022  
 Invoice # 698118052  
 LH/LH

Use one of the following payment methods and ensure your payment contains the details provided in the example.

Client Name	Client #	Invoice #	Amount	Comments
Deloitte Restructuring Inc.	560836	698118052	5,600.00 (CAD)	Payment for Invoice # 698118052

**Payment method # 1 - EFT/WIRE (Preferred Method)**

<b>Beneficiary Customer:</b> Borden Ladner Gervais, LLP Bay Adelaide Centre, East Tower 22 Adelaide Street West Toronto, ON, Canada M5H 4E3	<b>Beneficiary Bank:</b> Canadian Clearing Code: //CC000247696 Bank of Nova Scotia PO Box 4234 STN A Toronto, ON, Canada M5W 5P6
<b>Payments Originating from Canada or International Locations (Excluding US Dollars):</b> 12 Digit Account #: 80002 14221 11 Bank #: 002 Transit #: 80002 Swift Code: NOSCCATT	<b>Payments Originating in US Dollars:</b> ACH payments are not accepted 12 Digit Account #: 80002 51181 15 Bank #: 002 Transit #: 80002 Swift Code: NOSCCATT  <b>Intermediary Bank (If required):NOTE: do not use intermediary bank as the beneficiary bank</b> Bank of America NA 222 Broadway New York, N.Y. Swift Code: BOFAUS3N 10038 United States ABA #: 026009593

**Payment method # 2 - ONLINE PAYMENTS, CANADIAN FUNDS ONLY**

You may pay your invoice(s) to BLG through participating Canadian financial institution's online banking.

- As a bill payment - Select **Borden Ladner Gervais** through your financial institution and enter your client # **560836**
- As an Interac e-transfer - Add BLG's e-transfer email address [etransfers@blg.com](mailto:etransfers@blg.com) and enter the amount. No security question is required as BLG is Auto Deposit only. \*Note: your financial institution must support the Auto Deposit function.

**Remittance email required:** For payment methods #1 and #2 a payment confirmation must be sent by email to [remittanceadvice@blg.com](mailto:remittanceadvice@blg.com) and referencing your client number and invoice(s) paid.

**Payment method # 3 - CHEQUES**

<b>Send by mail:</b> Borden Ladner Gervais, LLP World Exchange Plaza 100 Queen Street, Suite 1300 Ottawa, ON, Canada K1P 1J9	<b>Send by courier:</b> Borden Ladner Gervais, LLP World Exchange Plaza 100 Queen Street, Suite 1000 Ottawa, ON, Canada K1P 1J9
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Attach remittance details with payment and reference invoice(s) paid.

For additional information contact [cashreceiptscoe@blg.com](mailto:cashreceiptscoe@blg.com) OR (613) 369-4777

PAYABLE ON RECEIPT  
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**GST/HST REGISTRATION # R869096974RT0005**



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 blg.com

Deloitte Restructuring Inc.  
 939 Granville Street  
 Vancouver, BC V6Z 1L3

July 11, 2022

Attention: Melinda McKie

Invoice # 698130355  
 Page 1

Re: Otso Gold Receivership

File No: 560836/000013

PROFESSIONAL SERVICES rendered to June 30, 2022 in connection with the above matter as described in the attached.

Fees	\$ 2,117.50
Disbursements and Other Charges	13.50
GST on Fees and Taxable Disbursements and Other Charges	105.88
PST on Fees and Taxable Disbursements and Other Charges	148.23
	<hr/>
Total this Invoice	<u><u>\$ 2,385.11</u></u>

THIS IS OUR ACCOUNT - E. & O.E.

**BORDEN LADNER GERVAIS LLP**

For: Lisa Hiebert



Borden Ladner Gervais LLP  
 Lawyers | Patent & Trade-mark Agents  
 1200 Waterfront Centre  
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 blg.com

Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

July 11, 2022  
 Invoice # 698130355  
 File No: 560836/000013  
 Page 2

PROFESSIONAL SERVICES RENDERED to June 30, 2022

Jun 1, 2022	L. Hiebert	0.40	Discussion with M. McKie re sale process issues and consider same; email to V. Tickle (counsel to Lionsbridge/Westech) re sale issues.	\$ 242.00
Jun 6, 2022	L. Hiebert	0.20	Emails re Otso OY sale process issues and contacts for same.	121.00
Jun 7, 2022	L. Hiebert	0.10	Emails with V. Tickle re Consent Order for Westech arrangements.	60.50
Jun 8, 2022	L. Hiebert	0.70	Call with M. Buttery, J-P. Mutanen and M. McKie re Otso OY sale process and issues for same.	423.50
Jun 9, 2022	L. Hiebert	0.30	Discussion with M. McKie re sale process issues and consider same.	181.50
Jun 10, 2022	L. Hiebert	0.40	Consider Otso OY sale process issues.	242.00
Jun 16, 2022	L. Hiebert	0.90	Discussion with M. McKie and N. McGregor re OY sale process and issues for same; consider issues for potential Application and transaction structure; email to J-P. Mutanen (counsel to Pandion) re security.	544.50
Jun 17, 2022	L. Hiebert	0.20	Emails with V. Tickle (counsel to Westech and Lionsbridge) re Consent Order and other issues; email to L. Purlund (CRO of Otso OY) re document issues,	121.00
Jun 22, 2022	L. Hiebert	0.30	Emails with P. Jaatinen and M. McKie re potential transaction issues.	181.50

TO OUR FEES

\$ 2,117.50

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Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

July 11, 2022  
 Invoice # 698130355  
 File No: 560836/000013  
 Page 3

FEE SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Avg. Rate/Hr.</u>	<u>Amount</u>
L. Hiebert	3.50	\$ 605.00	\$ 2,117.50
	<u>3.50</u>		<u>\$ 2,117.50</u>

DISBURSEMENTS AND OTHER CHARGES:

Non-Taxable

Bank Service Charges (Non-taxable) \$13.50

Total Non-Taxable Disbursements and Other Charges 13.50

Total Disbursements and Other Charges 13.50

Total Fees and Disbursements and Other Charges 2,131.00

GST on Fees and Taxable Disbursements and Other Charges 105.88

PST on Fees and Taxable Disbursements and Other Charges 148.23

TOTAL THIS INVOICE \$ 2,385.11



Borden Ladner Gervais LLP  
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blg.com

Deloitte Restructuring Inc.  
939 Granville Street  
Vancouver, BC V6Z 1L3

July 11, 2022  
Invoice # 698130355  
LH/LH

Re: Otso Gold Receivership

File No: 560836/000013

**REMITTANCE COPY**

Fees	\$ 2,117.50
Disbursements and Other Charges	13.50
GST on Fees and Taxable Disbursements and Other Charges	105.88
PST on Fees and Taxable Disbursements and Other Charges	148.23
	<hr/>
Total this Invoice	<u><u>\$ 2,385.11</u></u>

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 939 Granville Street  
 Vancouver, BC V6Z 1L3

July 11, 2022  
 Invoice # 698130355  
 LH/LH

Use one of the following payment methods and ensure your payment contains the details provided in the example.

Client Name	Client #	Invoice #	Amount	Comments
Deloitte Restructuring Inc.	560836	698130355	2,385.11 (CAD)	Payment for Invoice # 698130355

**Payment method # 1 - EFT/WIRE (Preferred Method)**

<b>Beneficiary Customer:</b> Borden Ladner Gervais, LLP Bay Adelaide Centre, East Tower 22 Adelaide Street West Toronto, ON, Canada M5H 4E3	<b>Beneficiary Bank:</b> Canadian Clearing Code: //CC000247696 Bank of Nova Scotia PO Box 4234 STN A Toronto, ON, Canada M5W 5P6
<b>Payments Originating from Canada or International Locations (Excluding US Dollars):</b> 12 Digit Account #: 80002 14221 11 Bank #: 002 Transit #: 80002 Swift Code: NOSCCATT	<b>Payments Originating in US Dollars:</b> ACH payments are not accepted 12 Digit Account #: 80002 51181 15 Bank #: 002 Transit #: 80002 Swift Code: NOSCCATT  <b>Intermediary Bank (If required):NOTE: do not use intermediary bank as the beneficiary bank</b> Bank of America NA 222 Broadway New York, N.Y. Swift Code: BOFAUS3N 10038 United States ABA #: 026009593

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- As an Interac -e-transfer – Add BLG's e-transfer email address [etransfers@blg.com](mailto:etransfers@blg.com) and enter the amount. No security question is required as BLG is Auto Deposit only. \*Note: your financial institution must support the Auto Deposit function.

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<b>Send by mail:</b> Borden Ladner Gervais, LLP World Exchange Plaza 100 Queen Street, Suite 1300 Ottawa, ON, Canada K1P 1J9	<b>Send by courier:</b> Borden Ladner Gervais, LLP World Exchange Plaza 100 Queen Street, Suite 1000 Ottawa, ON, Canada K1P 1J9
--	---

Attach remittance details with payment and reference invoice(s) paid.

For additional information contact [cashreceiptscoe@blg.com](mailto:cashreceiptscoe@blg.com) OR (613) 369-4777

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Deloitte Restructuring Inc.  
939 Granville Street  
Vancouver, BC V6Z 1L3

October 5, 2022

Attention: Melinda McKie

Invoice # 698160701  
Page 1

Re: Otso Gold Receivership

File No: 560836/000013

PROFESSIONAL SERVICES rendered to September 30, 2022 in connection with the above matter as described in the attached.

Fees	\$ 13,383.50
Less Discount	(3,383.50)
Fee Balance	<u>10,000.00</u>
Disbursements and Other Charges	104.55
GST on Fees and Taxable Disbursements and Other Charges	505.23
PST on Fees and Taxable Disbursements and Other Charges	<u>700.00</u>
Total this Invoice	<u><u>\$ 11,309.78</u></u>

THIS IS OUR ACCOUNT - E. & O.E.

**BORDEN LADNER GERVAIS LLP**

For: Lisa Hiebert



Borden Ladner Gervais LLP  
 Lawyers | Patent & Trade-mark Agents  
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Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

October 5, 2022  
 Invoice # 698160701  
 File No: 560836/000013  
 Page 2

PROFESSIONAL SERVICES RENDERED to September 30, 2022

Jul 12, 2022	L. Hiebert	0.70	Review and consider security granted by Otso OY in favour of Otso Gold Corp and consider requests to release same to facilitate transaction.	\$ 423.50
Jul 27, 2022	L. Hiebert	1.30	Email with JP Mutanen (Finnish counsel to Pandion) re request for security and information requested re same; email from L. Purlund (CRO to Otso OY and Otso AB) re sale process; call with M. McKie re issues arising from request for release of security and next steps to address same; review and consider form of release requested.	786.50
Jul 28, 2022	L. Hiebert	2.30	Call with L. Purlund, S. Edmonds (Finland M&A advisor), JP. Mutanen, J. Enns (Canadian counsel to Pandion) and M. McKie re sale process issues, request for releases and information required for same; review and consider form of release.	1,391.50
Jul 29, 2022	L. Hiebert	1.10	Review and consider information from L. Purlund re post-filing funding and potential sale process; call with M. McKie, N. McGregor and S. Edmonds re information required for report and authorization to release security; review and revise form of release and emails re same.	665.50
Aug 2, 2022	L. Hiebert	0.90	Call with Pandion Canadian legal team re issues for transaction and application and information required for same; consider issues for application.	544.50
Aug 4, 2022	L. Hiebert	1.00	Call with M. McKie and N. McGregor re issues for report and to conclude matter and consider issues for same; consider issues arising from form of assignment and release agreement and proposed updates to same.	605.00





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October 5, 2022

Invoice # 698160701

File No: 560836/000013

Page 3

Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

Aug 8, 2022	L. Hiebert	0.40	Review and consider updated form of release and email to J.P. Mutanen (Finland counsel to Pandion) re same.	242.00
Aug 15, 2022	L. Hiebert	0.30	Email from JP Mutanen (Finnish counsel to Pandion) re updated form of documents and review and consider same.	181.50
Aug 17, 2022	L. Hiebert	0.30	Discussion with M. McKie re issues and timing for transaction and potential application and consider issues for same.	181.50
Aug 30, 2022	L. Hiebert	0.50	Call with L. Purlund, J. Enns and N. Levine (counsel to Pandion), M. McKie and N. McGregor re transaction issues, next steps and application to approve transaction; consider issues and timing for application.	302.50
Aug 31, 2022	L. Hiebert	0.60	Review and consider sale documents and emails re same.	363.00
Sep 1, 2022	L. Hiebert	0.40	Consider issues re sale and call with M. McKie re same.	242.00
Sep 2, 2022	L. Hiebert	0.50	Meeting with Pandion, Receiver and representative of Otso OY re sale issues and next steps arising from same.	302.50
Sep 6, 2022	L. Hiebert	1.40	Review and consider materials for Otso OY sale and consider same; call with M. McKie re issues for Otso OY sale and application re security issues and consider same.	847.00
Sep 7, 2022	L. Hiebert	0.20	Emails re status of transaction and issues for same; call to Court re availability.	121.00
Sep 8, 2022	L. Hiebert	0.30	Call with M. McKie re issues for Finland transaction and consider same.	181.50
Sep 9, 2022	L. Hiebert	0.60	Call with L. Purlund and M. McKie re transaction issues; emails with J-P. Mutanen (Finnish counsel to Pandion) re restructuring programme support and consider issues for same.	363.00
Sep 12, 2022	L. Hiebert	1.30	Emails re transaction issues and potential support for restructuring programme.	786.50

PAYABLE ON RECEIPT

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October 5, 2022

Invoice # 698160701

File No: 560836/000013

Page 4

Deloitte Restructuring Inc.  
 Re: Otso Gold Receivership

Sep 13, 2022	L. Hiebert	0.80	Consider issues re transaction and discussions and emails with M. McKie re same; email to JP Mutanen (Finnish counsel to Pandion) re transaction issues and next steps for same.	484.00
Sep 14, 2022	L. Hiebert	0.30	Consider issues re approval required and emails with JP. Mutanen (Finland counsel to Pandion) re same.	181.50
Sep 15, 2022	L. Hiebert	0.40	Consider issues for request for receiver position on Finland restructuring programme and email to P. Jaatinen (Finnish administrator) re same.	242.00
Sep 21, 2022	L. Hiebert	0.90	Call with M. McKie re issues and next steps for potential application; emails with Finnish counsel re applications and timing for same; discussion with J. Pepper re issues for application.	544.50
Sep 21, 2022	J. Pepper	0.50	Discussion with L. Hiebert re: status of file and preparation for drafting application/order	197.50
Sep 22, 2022	L. Hiebert	0.50	Emails with Finnish counsel re transaction issues and consider same.	302.50
Sep 27, 2022	L. Hiebert	0.30	Emails re status of transaction and next steps; call to Court Scheduling re timing for hearing.	181.50
Sep 27, 2022	J. Pepper	2.40	Review Assignment and Release Agreement; Draft notice of application and orders re: advice and direction;	948.00
Sep 28, 2022	L. Hiebert	0.40	Review and revise materials for advice and directions and consider issues for same.	242.00
Sep 28, 2022	J. Pepper	2.80	Draft notice of application and orders re: advice and direction; Research legal basis section; Consider updates to documents with regards to discussion with L.Hiebert;	1,106.00
Sep 29, 2022	L. Hiebert	0.50	Review and revise materials for advice and directions.	302.50

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October 5, 2022  
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 File No: 560836/000013  
 Page 5

Sep 30, 2022	L. Hiebert	0.20	Emails with M. McKie re support for restructuring programme and timing for court approval and consider issues for same.	121.00
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TO OUR FEES	\$ 13,383.50
Less Discount	(3,383.50)
FEE BALANCE	<u>10,000.00</u>

FEE SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Avg. Rate/Hr.</u>	<u>Amount</u>
L. Hiebert	18.40	\$ 443.60	\$ 8,162.25
J. Pepper	5.70	322.41	1,837.75
	<u>24.10</u>		<u>\$ 10,000.00</u>

DISBURSEMENTS AND OTHER CHARGES:

<u>Taxable</u>	G=GST; Q=QST; H=HST; P=PST	
Agent's Account		<u>\$104.55</u> G
Total Taxable Disbursements and Other Charges		<u>104.55</u>
Total Disbursements and Other Charges		104.55
Total Fees and Disbursements and Other Charges		<u>10,104.55</u>
GST on Fees and Taxable Disbursements and Other Charges		505.23

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October 5, 2022  
Invoice # 698160701  
File No: 560836/000013  
Page 6

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PST on Fees and Taxable Disbursements and Other Charges

700.00

TOTAL THIS INVOICE

\$ 11,309.78



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October 5, 2022  
Invoice # 698160701  
LH/LH

Re: Otso Gold Receivership

File No: 560836/000013

**REMITTANCE COPY**

Fees	\$ 13,383.50
Less Discount	(3,383.50)
Fee Balance	<u>10,000.00</u>
Disbursements and Other Charges	104.55
GST on Fees and Taxable Disbursements and Other Charges	505.23
PST on Fees and Taxable Disbursements and Other Charges	<u>700.00</u>
Total this Invoice	<u><b>\$ 11,309.78</b></u>

PLEASE REFER TO PAYMENT OPTIONS PAGE FOR REMITTANCE INFORMATION.



Borden Ladner Gervais LLP  
 Lawyers | Patent & Trade-mark Agents  
 1200 Waterfront Centre  
 200 Burrard St, P.O. Box 48600  
 Vancouver, BC, Canada V7X 1T2  
 T 604.687.5744 F 604.687.1415  
 blg.com

Deloitte Restructuring Inc.  
 939 Granville Street  
 Vancouver, BC V6Z 1L3

October 5, 2022  
 Invoice # 698160701  
 LH/LH

Use one of the following payment methods and ensure your payment contains the details provided in the example.

Client Name	Client #	Invoice #	Amount	Comments
Deloitte Restructuring Inc.	560836	698160701	11,309.78 (CAD)	Payment for Invoice # 698160701

**Payment method # 1 - EFT/WIRE (Preferred Method)**

<b>Beneficiary Customer:</b> Borden Ladner Gervais, LLP Bay Adelaide Centre, East Tower 22 Adelaide Street West Toronto, ON, Canada M5H 4E3	<b>Beneficiary Bank:</b> Canadian Clearing Code: //CC000247696 Bank of Nova Scotia PO Box 4234 STN A Toronto, ON, Canada M5W 5P6
<b>Payments Originating from Canada or International Locations (Excluding US Dollars):</b> 12 Digit Account #: 80002 14221 11 Bank #: 002 Transit #: 80002 Swift Code: NOSCCATT	<b>Payments Originating in US Dollars:</b> ACH payments are not accepted 12 Digit Account #: 80002 51181 15 Bank #: 002 Transit #: 80002 Swift Code: NOSCCATT  <b>Intermediary Bank (If required):NOTE: do not use intermediary bank as the beneficiary bank</b> Bank of America NA 222 Broadway New York, N.Y. Swift Code: BOFAUS3N 10038 United States ABA #: 026009593

**Payment method # 2 - ONLINE PAYMENTS, CANADIAN FUNDS ONLY**

You may pay your invoice(s) to BLG through participating Canadian financial institution's online banking.

- As a bill payment - Select **Borden Ladner Gervais** through your financial institution and enter your client # **560836**
- As an Interac -e-transfer – Add BLG's e-transfer email address [etransfers@blg.com](mailto:etransfers@blg.com) and enter the amount. No security question is required as BLG is Auto Deposit only. \*Note: your financial institution must support the Auto Deposit function.

**Remittance email required:** For payment methods #1 and #2 a payment confirmation must be sent by email to [remittanceadvice@blg.com](mailto:remittanceadvice@blg.com) and referencing your client number and invoice(s) paid.

**Payment method # 3 - CHEQUES**

**Send by mail:**

Borden Ladner Gervais, LLP  
 World Exchange Plaza  
 100 Queen Street, Suite 1300  
 Ottawa, ON, Canada K1P 1J9

**Send by courier:**

Borden Ladner Gervais, LLP  
 World Exchange Plaza  
 100 Queen Street, Suite 1000  
 Ottawa, ON, Canada K1P 1J9

Attach remittance details with payment and reference invoice(s) paid.

For additional information contact [cashreceiptscoe@blg.com](mailto:cashreceiptscoe@blg.com) OR (613) 369-4777

PAYABLE ON RECEIPT  
 INTEREST AT THE RATE OF 12.0% PER ANNUM MAY BE CHARGED ON ACCOUNTS WHICH ARE OVERDUE  
**GST/HST REGISTRATION # R869096974RT0005**

This is **Exhibit "B"** referred to in **Affidavit #1**  
of **Lisa C. Hiebert** made before me  
on October 11, 2022



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A Commissioner for taking Affidavits  
for British Columbia

**IN THE MATTER OF THE RECEIVERSHIP OF OTSO GOLD CORP.  
Summary of BLG's Professional Fees by Person**

<b>Name</b>	<b>Position</b>	<b>Total Hours</b>	<b>Standard Rate</b>	<b>Effective Rate</b>	<b>Total Fees</b>
Matthew Kronby	Partner, International Trade and Investment	0.8	\$1,150.00	\$1,095.43	<b>\$876.34</b>
Kent Kufeldt	National Business Leader, Securities and Capital Markets	3.5	\$970.00	\$882.03	<b>\$3,087.10</b>
Beverly Gilbert	National Leader, Commodity Tax	0.9	\$880.00	\$800.83	<b>\$720.75</b>
Randy Morphy	Partner, Tax	0.3	\$870.00	\$791.73	<b>\$237.52</b>
Magnus Verbrugge	Senior Counsel, Financial Services	2.1	\$790.00	\$759.65	<b>\$1,595.27</b>
Lisa Hiebert	Partner, Financial Services	236.1	\$605.00	\$568.83	<b>\$134,300.33</b>
Danielle Lewchuk	Partner, Tax	3.7	\$565.00	\$514.17	<b>\$1,902.44</b>
Ryan Laity	Partner, Financial Services	8.9	\$560.00	\$512.53	<b>\$4,561.56</b>
Parisa Hurst	Senior Associate, Commercial Real Estate	1.7	\$545.00	\$495.97	<b>\$843.15</b>
Jennifer Pepper	Associate, Financial Services	56.3	\$395.00	\$365.54	<b>\$20,579.67</b>
Catherine Connor	Paralegal, Commercial Litigation	5.4	\$305.00	\$276.48	<b>\$1,492.98</b>
Victoria Smith	Paralegal, Due Diligence	0.2	\$275.00	\$249.10	<b>\$49.82</b>
Pippa Sugimoto	Paralegal, Commercial Real Estate	0.6	\$265.00	\$241.15	<b>\$144.69</b>
Caitlin Hansen	Paralegal, Commercial Litigation	2.8	\$225.00	\$217.08	<b>\$607.81</b>
Casandra Lopes	Paralegal, Commercial Real Estate	3.9	\$215.00	\$195.66	<b>\$763.07</b>
<b>TOTAL</b>		<b>327.20</b>			<b>\$171,762.50</b>



No. S-220231  
Vancouver Registry

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**IN THE SUPREME COURT OF BRITISH COLUMBIA  
IN BANKRUPTCY AND INSOLVENCY**

**IN THE MATTER OF THE RECEIVERSHIP OF  
OTSO GOLD CORP.**

BETWEEN:

PANDION MINE FINANCE LP, RIVERMET RESOURCE CAPITAL LP  
AND PFL RAAHE HOLDINGS LP

PETITIONERS

AND:

OTSO GOLD CORP.

RESPONDENT

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**AFFIDAVIT #1 OF LISA C. HIEBERT**

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BORDEN LADNER GERVAIS LLP  
1200 Waterfront Centre  
200 Burrard Street  
P.O. Box 48600  
Vancouver, B.C., V7X 1T2  
Telephone: (604) 640-4106  
Client/Matter: 560836/00013  
Attn: Jennifer Pepper