



This is the 3rd Affidavit of Lisa C. Hiebert in this case and was made on July 14, 2023.

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 #3 OF LISA C. HIEBERT

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

1. As of the date of this affidavit, I am a Partner at Borden Ladner Gervais LLP (“BLG”), counsel for Deloitte Restructuring Inc., court-appointed receiver and receiver-manager (in such capacity, the “Receiver”) of the assets, undertakings and properties of Otso Gold Corp., 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.
2. This affidavit is supplemental to my first affidavit, dated October 11, 2022 (the “First Affidavit”) and provides a summary of BLG’s fees in these proceedings incurred after September 30, 2022. BLG’s fees prior to September 30, 2022 are summarized in the First Affidavit, including providing copies of the Accounts (as defined in the First Affidavit). My second affidavit sworn in these proceedings was sworn in connection with the Registrar’s Hearing (defined below).

3. Attached and marked as **Exhibit “A”** to this Affidavit are true copies of the recent accounts of BLG in this matter (collectively, the “**Recent Accounts**” and together with the Accounts, the “**Complete BLG Accounts**”), as follows:

Invoice Number	Invoice Date	Amount
698205392	December 31, 2022	\$22,611.78
698222175	March 6, 2023	\$1,626.24
698256449	June 5, 2023	\$3,491.04
698267789 (the “ July Account ”)	July 10, 2023	\$42,254.08
TOTAL:		\$69,983.14

4. Each of the Recent Accounts includes a summary of the fees, calculated on the basis of the hours spent by BLG’s personnel, multiplied by the applicable hourly rates charged by BLG. The total time expended by BLG’s personnel in relation to the Recent Accounts was 161.70 hours.
5. As detailed in the Recent Accounts, from October 2, 2022 to June 19, 2023, the invoiced fees and disbursements incurred by BLG, inclusive of taxes, amounted to a total of \$69,983.14, which consists of \$61,880.83 in fees, \$652.00 in disbursements, \$3,118.65 in GST and \$4,331.66 in PST. I estimate that the costs to conclude the proceedings will be \$10,000 or less (exclusive of taxes).
6. Attached and marked as **Exhibit “B”** to this Affidavit is a complete summary of the fees and disbursements incurred since the beginning of these proceedings. As detailed in the Complete BLG Accounts, the total fees and disbursements, inclusive of taxes, amounted to a total of \$263,263.30, which consists of \$233,643.33 in fees, \$1,521.66 in disbursements, \$11,743.26 in GST and \$16,355.05 in PST.
7. Exhibit “B” also includes a summary of the fees calculated on the basis of the hours spent by BLG’s personnel, multiplied by the applicable hourly rates charged by BLG. The total time expended by BLG’s personnel in relation to the Complete BLG Accounts was 490.1 hours.
8. To the best of my knowledge, information and belief, the information contained in the Recent 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.

9. In the course of these proceedings, a number of matters were required of BLG. For the time spent after September 30, 2022, particulars of this work are set out in the detailed narratives provided with the Recent Accounts, and included among other things:
- (a) preparing for and attending the court application on October 24, 2022;
 - (b) preparing for and attending the Registrar's hearing on April 17, 2023 (the "**Registrar's Hearing**"), conducted at the direction of this Honourable Court, including gathering and preparing evidence to assist the Court in evaluating the rates charged for lawyers of similar experience and expertise in comparable matters; and
 - (c) communicating with the Receiver, the Petitioners, the Petitioners' counsel, and various secured creditors and other stakeholders regarding these proceedings, including, but not limited to, the October 24, 2022 hearing, the potential assignment of certain unspecified causes of action, the Registrar's Hearing and the conclusion of the receivership proceedings; and
 - (d) assisting the Receiver in the preparation of its reports to the Court.

Hourly Rates and Expertise

10. Further to the Hourly Rates and Expertise section of the First Affidavit, which outlined the lawyers and support staff who assisted with these receivership proceedings in 2022, the other lawyers who assisted with this matter in 2023 were Jake Cabott and Natalie Paunic. We were also assisted by an articling student Lucas Beatch.
11. In 2023, Mr. Cabott's rate was \$615. Mr. Cabott was called to the bar in British Columbia in 2013 and the Yukon in 2019. During and since the relevant time period, Mr. Cabott has practiced in the area of commercial litigation. Mr. Cabott was lead counsel on the Registrar Hearing.
12. In 2023, Ms. Paunic's rate was \$495. Ms. Paunic was called to the bar in Ontario in 2022. During and since the relevant time period, Ms. Paunic has practiced in the area of disputes. Ms. Paunic assisted with an affidavit used in the Registrar's Hearing. As noted below, as a courtesy to the stakeholders in these proceedings, BLG has not charged for Ms. Paunic's time.
13. During the period of which the Recent Accounts were issued, Mr. Beatch's articling student rate was \$250 (2022) and \$265 (2023). Mr. Beatch was called to the bar in British Columbia in 2023. During and since the relevant time period, Mr. Beatch has practiced in the area of insolvency and restructuring law. As noted below, as a courtesy to the stakeholders in these proceedings, BLG has not charged for Mr. Beatch's time.
14. In 2023, my standard hourly rate was \$660.

15. In 2023, Ms. Catherine Connor's standard hourly rate was \$330.
16. In 2023, Ms. Pepper's standard hourly rate in 2023 was \$455.

Updated Rates and Discounts

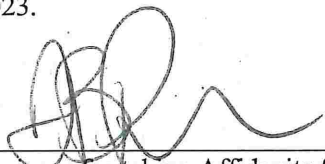
17. I am advised by Mr. Cabott and Jennifer Pepper, and believe, that following the Registrar's Hearing, Master Vos provided directions. These directions are reflected in the Registrar's Report entered June 13, 2023.
18. Pursuant to the Registrar's Report, Master Vos found that, based on the evidence presented, the market hourly rates for legal service provided by insolvency lawyers in their first or second years of practice ranged between \$315 and \$395 and recommended that Ms. Pepper's rate be set at \$325 per hour for the 56.3 hours of legal services that were detailed in the Accounts.
19. As a result of the recommendation, BLG revised the fees charged for Ms. Pepper on the July Account. Specifically:
 - (a) BLG reduced Ms. Pepper's rate on the July Account to \$325. The July Account included time spent in 2022 and in 2023. Although Ms. Pepper's rate increased effective January 1, 2023 to reflect additional experience, BLG has applied the \$325 rate for her time in 2023.
 - (b) If the \$325 rate were applied to the 56.3 hours, the Accounts included fees of \$2,282.17 that should not have been incurred or payable. Accordingly, BLG reduced Ms. Pepper's fees on the July Account by an additional \$2,282.17.
20. The July Account also had additional discounts applied to ensure that the fees charged are reasonable for the services provided, and to provide a courtesy to stakeholders. In particular:
 - (a) although customary to do so, BLG has not charged any disbursements attributable to printing or photocopies (which were required for court materials delivered to the Court for the Registrar's Hearing);
 - (b) although Mr. Beatch assisted with valuable research to assist this Honourable Court with evidence of the market rates charged in similar proceedings for lawyers of similar experience, BLG did not charge any time for this work. This consisted of 61.4 hours that, at his effective rate of \$253.98, accounted for a total discount of \$15,594.50, which is not reflected on the face of the July Invoice; and
 - (c) although Ms. Paunic assisted with evidence necessary for the Registrar's Hearing, BLG has reduced her time to \$0.

The Fees are Reasonable

21. As with the Accounts (attached to the First Affidavit), in respect to the Recent Accounts, I have reviewed the Recent 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, reasonable and necessary in the circumstances;
 - (b) the work was delegated to the appropriate professionals with the appropriate seniority, expertise, and hourly rates;
 - (c) the Recent 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.
22. Based on my role and experience as the practice group lead for BLG's insolvency practice in Vancouver, my understanding of and role in BLG's annual rate review process and my review of the BLG fees billed in this matter, I confirm that:
- (a) BLG's standard rates are consistent with market rates charged for comparable work in matters of similar complexity in Vancouver;
 - (b) the rates charged in this matter were discounted where appropriate to ensure that BLG's fees accurately reflected the work performed;
 - (c) the difference between the billing rates of associates and partners at BLG, although not always significant, is reasonable and consistent with market rates;
 - (d) the billing rate for BLG's insolvency associates is reasonable, as the rates reflect what our clients are willing to pay in the market; and
 - (e) BLG associates add value to our insolvency files that is proportionate to their billing rate, taking on tasks that are necessary to progress the file, including drafting materials, participating in strategy and planning for the filing and appearing and speaking in Court. We assign tasks to the appropriate professionals who have the necessary skills to complete the tasks and progress the file in a cost-efficient manner.

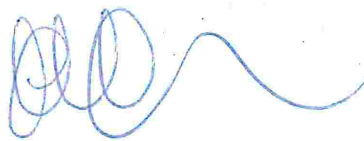
23. I have also applied discounts to the Recent Accounts where I considered it appropriate, having regard to the complexity of the matter and the work required and ensuring that the time spent was prudent and economical.
24. I note that due to the reductions applied in the July Account, Ms. Pepper's rate is less than the effective rate charged for Ms. Connor, a senior paralegal on the July Account. This discrepancy is because Ms. Pepper's rate was reduced to reflect the Registrar's Report and to give effect to a reduction on earlier accounts. I note that Ms. Connor is a senior paralegal with significant experience assisting in court proceedings, and that the time incurred by Ms. Connor in the July Account was 0.5 hours, reflecting fees of \$165. I believe that if similar work had been completed by another timekeeper, it would have resulted in additional time and expense.
25. This affidavit is sworn in support of an application for approval of the fees incurred by the Receiver and BLG in these proceedings.

SWORN BEFORE ME at the City of Vancouver
 in the Province of British Columbia, this 14th day
 of July, 2023.



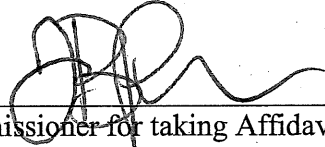
 A Commissioner for taking Affidavits for
 British Columbia

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



LISA C. HIEBERT

This is **Exhibit "A"** referred to in **Affidavit #3**
Of **Lisa C. Hiebert** made before me
on July 14, 2023



A Commissioner for taking Affidavits
for British Columbia



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

December 31, 2022

Attention: Melinda McKie

Invoice # 698205392

Page 1

Re: Otso Gold Receivership

File No: 560836/000013

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

Fees	\$ 27,756.00
Less Discount	(7,756.00)
Fee Balance	<u>20,000.00</u>
Disbursements and Other Charges	205.50
GST on Fees and Taxable Disbursements and Other Charges	1,006.28
PST on Fees and Taxable Disbursements and Other Charges	<u>1,400.00</u>
Total this Invoice	<u><u>\$ 22,611.78</u></u>

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

BORDEN LADNER GERVAIS LLP.

For: Lisa Hiebert



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December 31, 2022
 Invoice # 698205392
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Deloitte Restructuring Inc.
 Re: Otso Gold Receivership

PROFESSIONAL SERVICES RENDERED to December 31, 2022

Oct 2, 2022	L. Hiebert	0.60	Review and revise materials for advice and directions and consider issues re same.	\$ 363.00
Oct 3, 2022	C. Hansen	0.20	Prepare and submit request to appear.	45.00
Oct 3, 2022	L. Hiebert	1.20	Review and comment on draft report; consider issues for upcoming application and draft materials for same.	726.00
Oct 4, 2022	L. Hiebert	1.00	Call with M. McKie and N. McGregor re application for directions and consider issues for same; review and revise application materials.	605.00
Oct 5, 2022	L. Hiebert	1.50	Review and revise materials for application; call with T. Jeffries (counsel to Otso) re background to application and issues for same; review and consider updated restructuring program.	907.50
Oct 5, 2022	J. Pepper	5.30	Review Receiver report; update Notice of Application; draft Fee approval materials; coordinate BLG invoices; discussion with L. Hiebert re status and timing of hearing.	2,093.50
Oct 6, 2022	L. Hiebert	0.80	Emails with Court and M. McKie re timing for upcoming application; consider issues for upcoming application and revise materials for same; review and consider restructuring program and emails re same.	484.00
Oct 6, 2022	J. Pepper	3.20	Correspondence with Accounting re: invoices; review Invoices; update application materials with fee approval materials; correspondence re hearing dates.	1,264.00

PAYABLE ON RECEIPT
 INTEREST AT THE RATE OF 12.0% PER ANNUM MAY BE CHARGED ON ACCOUNTS WHICH ARE OVERDUE
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Deloitte Restructuring Inc.
 Re: Otso Gold Receivership

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Oct 7, 2022	L. Hiebert	3.60	Emails with C. Svartstrom (Finland administrator) re issues for restructuring programme and consider same; call with J. Bellissimo and J. Enns (counsel to Pandion), M. McKie and N. McGregor re issues for application and additional information required for same; review and revise materials for application and consider issues for same.	2,178.00
Oct 7, 2022	J. Pepper	0.20	Correspondence re updates to application documents and Deloitte invoices.	79.00
Oct 11, 2022	L. Hiebert	4.10	Call with L. Purlund (Otso OY), JP Mutanen (Finnish counsel to Pandion) and M. McKie re issues and timing for conditions to transaction; emails with Court and stakeholders re timing for hearing; review and revise materials for advice and directions and fee/activity approval and consider issues for same; finalize evidence for fee approval; review and comment on draft report and consider issues for same; discussions with M. McKie re issues for upcoming application and consider same.	2,480.50
Oct 11, 2022	J. Pepper	5.40	Update advice and direction application materials re Second Report updates and Deloitte Fees; Review Application's Legal Basis section and note up cases; Review and redact invoices; Compile affidavits and prepare for execution; Execute L.Hiebert Affidavit; Discussion with L. Hiebert re hearing and filing materials and next steps	2,133.00
Oct 12, 2022	L. Hiebert	0.80	Finalize application materials for directions and approval of fees/activities and arrangements for filing and service of same.	484.00

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Deloitte Restructuring Inc.
 Re: Otso Gold Receivership

Oct 12, 2022	J. Pepper	2.60	Update Affidavit and Notice of Application; Correspondence re updates to Second Report; Meeting with M. McKie; Coordinate compilation of documents for filing; Correspondence with service list re application materials; Coordinate filing application materials; Update and circulate revised Service List.	1,027.00
Oct 13, 2022	C.A. Connor	2.00	File analysis and consider Notice of Application. Commence selection of materials to prepare application record and book of authorities re hearing returnable October 24, 2022 for advice and direction, sealing and fee approval orders.	610.00
Oct 13, 2022	J. Pepper	0.40	Circulate stamped first pages of file documents, Coordinate compilation of application record and book of authorities; Consider dates and outstanding items for filing.	158.00
Oct 14, 2022	C.A. Connor	2.30	Continue selection of materials, case law and legislation and update draft application record and book of authorities for hearing returnable October 24, 2022.	701.50
Oct 17, 2022	C.A. Connor	0.40	Revise and finalize application record re October 24, 2022 applications for advise and direction, sealing and fee approval orders.	122.00
Oct 17, 2022	L. Hiebert	0.30	Call with J. Enns (counsel to Pandion) re upcoming hearing.	181.50
Oct 17, 2022	J. Pepper	0.50	Review and update BOA index and Application Record; consider issues re Sealing Order; coordinate compilation of physical documents.	197.50



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December 31, 2022
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Deloitte Restructuring Inc.
 Re: Otso Gold Receivership

Oct 19, 2022	L. Hiebert	1.20	Call with B. Hicks (counsel to Kroll) re document issues and next steps; call with T. Jeffries (counsel to Otso) re upcoming hearing; correspondence from B. Hicks re documents and consider same; call with J. Enns (counsel to Pandion) re upcoming hearing; email and call with M. McKie re next steps and upcoming hearing.	726.00
Oct 19, 2022	J. Pepper	1.10	Review and update the application record; consider updates to Orders and Response to Application.	434.50
Oct 20, 2022	L. Hiebert	0.30	Emails with J. Enns re issues for upcoming hearing; arrangements for application record and other logistics for hearing.	181.50
Oct 20, 2022	J. Pepper	0.70	Updates to application record and book of authorities indices; calls with counsel for Petitioners re application response; coordinate updates to application record and book of authorities; correspondence re application response; coordinate filing of application record; Circulate indices to service list.	276.50
Oct 21, 2022	L. Hiebert	2.50	Review materials and prepare for application for advice and directions; call and email with T. Jeffries (counsel to Otso) and J. Enns (counsel to Pandion) re issues for hearing.	1,512.50
Oct 21, 2022	J. Pepper	4.40	Review and update Orders; coordinated compiled application record updates; prepare submissions for chambers.	1,738.00
Oct 23, 2022	J. Pepper	1.40	Review cited case law; Prepare for chambers hearing re: fee approval application.	553.00

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December 31, 2022
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Deloitte Restructuring Inc.
 Re: Otso Gold Receivership

Oct 24, 2022	L. Hiebert	2.30	Prepare for and attend application for advice and directions; emails to C. Svartstrom (Finland administrator) re support for restructuring program and JP. Mutanen (Finland counsel to Pandion) re assignment and release agreement; consider response to Brunswick correspondence re potential offer.	1,391.50
Oct 24, 2022	J. Pepper	2.90	Prepare for and attend hearing re Order for Advice and Direction, Sealing Order and Fee Approval Order; coordinate with Court Registry re vetting and signing Orders; circulate filed Orders.	1,145.50
Oct 25, 2022	L. Hiebert	0.20	Discussion with M. McKie re next steps and consider issues for same.	121.00
Oct 26, 2022	L. Hiebert	0.50	Consider liquidation and wrap-up issues and emails with M. McKie re same.	302.50
Oct 27, 2022	L. Hiebert	0.80	Consider issues re assignment and emails re same; consider response to Kroll and prepare same; review and consider documents re conclusion of Otso AB and emails re same.	484.00
Oct 28, 2022	L. Hiebert	0.20	Email to B. Hicks (counsel to Kroll) re records issues and consider same.	121.00
Oct 31, 2022	L. Hiebert	0.30	Emails with M. McKie re emails from V. Koshkin and consider issues re same; emails with V. Koshkin re assignment offer and issues for same.	181.50
Nov 15, 2022	L. Hiebert	0.80	Email to K. McEwan and W. Stransky (counsel to Brunswick) re offer and issues for same; emails with J. Enns (counsel to Pandion) and T. Jeffries (counsel to Otso) re form of order; emails with M. McKie re Westech issues and matters to conclude receivership; email to D. Shouldice (counsel to Westech) re invoices and issues for same; email to J. Habib (counsel to Microsoft) re questions re records.	484.00

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 Page 7

Deloitte Restructuring Inc.
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Nov 17, 2022	L. Hiebert	0.80	Emails re conclusion of transaction; call with J. Bellissimo and J. Enns (counsel to Pandion) re status and next steps; emails re Otso AB windup and issues for same.	484.00
Nov 21, 2022	L. Hiebert	0.20	Email to D. Shouldice re Westech issues; emails with M. McKie re next steps and issues re Finland; emails re issues for taxation and consider same.	121.00
Nov 24, 2022	L. Hiebert	0.50	Email from V. Koshkin; emails with J. Enns re form of order; review materials and consider issues for taxation pursuant to Court direction.	302.50
Nov 25, 2022	J. Pepper	0.80	Review and finalize Order; draft letter to Registry; coordinate for courier delivery.	316.00
Nov 29, 2022	J. Pepper	0.10	Correspondence re: executed draft order; Circulate order to service list	39.50

TO OUR FEES	\$ 27,756.00
Less Discount	(7,756.00)
FEE BALANCE	20,000.00

FEE SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Avg. Rate/Hr.</u>	<u>Amount</u>
C.A. Connor	4.70	\$ 219.77	\$ 1,032.93
C. Hansen	0.20	162.15	32.43
L. Hiebert	24.50	435.94	10,680.55
J. Pepper	29.00	284.62	8,254.09
	<u>58.40</u>		<u>\$ 20,000.00</u>

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Deloitte Restructuring Inc.
 Re: Otso Gold Receivership

December 31, 2022
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DISBURSEMENTS AND OTHER CHARGES:

Non-Taxable

Agent's Account	<u>\$80.00</u>
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Total Non-Taxable Disbursements and Other Charges	<u>80.00</u>
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Taxable

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

Agency Fees - West Coast Title Search: Court Filing ordered by Bosma, Cristine K.	63.50	G
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Agency Fees - West Coast Title Search: Court Filing ordered by Fotia, Vanessa	62.00	G
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Total Taxable Disbursements and Other Charges	<u>125.50</u>
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Total Disbursements and Other Charges	205.50
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Total Fees and Disbursements and Other Charges	<u>20,205.50</u>
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GST on Fees and Taxable Disbursements and Other Charges	1,006.28
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PST on Fees and Taxable Disbursements and Other Charges	<u>1,400.00</u>
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TOTAL THIS INVOICE	<u><u>\$ 22,611.78</u></u>
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PAYABLE ON RECEIPT
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Deloitte Restructuring Inc.
939 Granville Street
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December 31, 2022
Invoice # 698205392
LH/LH

Re: Otso Gold Receivership

File No: 560836/000013

REMITTANCE COPY

Fees	\$ 27,756.00
Less Discount	(7,756.00)
Fee Balance	<u>20,000.00</u>
Disbursements and Other Charges	205.50
GST on Fees and Taxable Disbursements and Other Charges	1,006.28
PST on Fees and Taxable Disbursements and Other Charges	<u>1,400.00</u>
Total this Invoice	<u><u>\$ 22,611.78</u></u>

PLEASE REFER TO PAYMENT OPTIONS PAGE FOR REMITTANCE INFORMATION.

PAYABLE ON RECEIPT
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 blg.com

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

March 6, 2023

Attention: Melinda McKie

Invoice # 698222175
 Page 1

Re: Otso Gold Receivership

File No: 560836/000013

PROFESSIONAL SERVICES rendered to February 28, 2023 in connection with the above matter as described in the attached.

Fees	\$ 1,452.00
Disbursements and Other Charges	0.00
GST on Fees and Taxable Disbursements and Other Charges	72.60
PST on Fees and Taxable Disbursements and Other Charges	101.64
	<hr/>
Total this Invoice	<u>\$ 1,626.24</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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March 6, 2023

Invoice # 698222175

File No: 560836/000013

Page 2

Deloitte Restructuring Inc.
 Re: Otso Gold Receivership

PROFESSIONAL SERVICES RENDERED to February 28, 2023

Jan 13, 2023	L. Hiebert	0.30	Discussion with M. McKie re issues arising from potential settlement between Brunswick/Pandion and next steps.	\$ 198.00
Jan 17, 2023	L. Hiebert	0.40	Call with J. Enns (counsel to Pandion) re potential settlement and impact on receivership/next steps arising from same.	264.00
Jan 31, 2023	L. Hiebert	0.10	Email from R. Morse re issues for engagement and email to J. Enns (counsel to Pandion) re same.	66.00
Feb 2, 2023	L. Hiebert	0.20	Call with R. Morse re representation for Brunswick and potential settlement between Brunswick/Pandion.	132.00
Feb 8, 2023	L. Hiebert	0.30	Email from J. Enns (counsel to Pandion) re counsel for Brunswick and email to R. Morse re same; discussion with M. McKie re various issues and next steps for assignment request.	198.00
Feb 24, 2023	L. Hiebert	0.30	Call with T. Jeffries (counsel to Otso) re status and next steps.	198.00
Feb 28, 2023	L. Hiebert	0.60	Call from T. Jeffries (counsel to Brunswick) re offer to acquire claim and consider issues arising from same.	396.00

TO OUR FEES

\$ 1,452.00

FEE SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Avg. Rate/Hr.</u>	<u>Amount</u>
L. Hiebert	2.20	\$ 660.00	\$ 1,452.00
	<u>2.20</u>		<u>\$ 1,452.00</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



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Deloitte Restructuring Inc.
Re: Otso Gold Receivership

March 6, 2023
Invoice # 698222175
File No: 560836/000013
Page 3

Total Fees and Disbursements and Other Charges	1,452.00
GST on Fees and Taxable Disbursements and Other Charges	72.60
PST on Fees and Taxable Disbursements and Other Charges	101.64
TOTAL THIS INVOICE	\$ 1,626.24

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GST/HST REGISTRATION # R869096974RT0005



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

March 6, 2023
Invoice # 698222175
LH/LH

Re: Otso Gold Receivership

File No: 560836/000013

REMITTANCE COPY

Fees	\$ 1,452.00
Disbursements and Other Charges	0.00
GST on Fees and Taxable Disbursements and Other Charges	72.60
PST on Fees and Taxable Disbursements and Other Charges	101.64
	<hr/>
Total this Invoice	<u>\$ 1,626.24</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 5, 2023

Attention: Melinda McKie

Invoice # 698256449

Page 1

Re: Otso Gold Receivership

File No: 560836/000013

PROFESSIONAL SERVICES rendered to May 31, 2023 in connection with the above matter as described in the attached.

Fees	\$ 4,117.00
Less Discount	(1,000.00)
Fee Balance	<u>3,117.00</u>
Disbursements and Other Charges	0.00
GST on Fees and Taxable Disbursements and Other Charges	155.85
PST on Fees and Taxable Disbursements and Other Charges	218.19
	<u>3,491.04</u>
Total this Invoice	

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

BORDEN LADNER GERVAIS LLP

For: Lisa Hiebert



Borden Ladner Gervais LLP
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June 5, 2023

Invoice # 698256449

File No: 560836/000013

Page 2

Deloitte Restructuring Inc.
 Re: Otso Gold Receivership

PROFESSIONAL SERVICES RENDERED to May 31, 2023

Mar 2, 2023	L. Hiebert	0.20	Discussion with M. McKie re issues for potential assignment.	\$ 132.00
Apr 11, 2023	L. Hiebert	0.70	Review and consider assignment documents and email to M. McKie re same.	462.00
Apr 12, 2023	L. Hiebert	0.80	Consider issues re assignment and discussion with M. McKie re same; email to J. Enns and J. Bellissimo re assignment.	528.00
Apr 13, 2023	L. Hiebert	2.00	Call with J. Bellissimo and J. Enns (counsel to Pandion) re proposed assignment and Pandion position for same; consider assignment issues and discussion with M. McKie re same; call with T. Jeffries (counsel to Brunswick) re assignment proposal and consider issues arising from same; prepare response to Brunswick and email to M. McKie re same.	1,320.00
Apr 14, 2023	L. Hiebert	0.50	Consider issues re assignment proposal and emails with M. McKie re same; emails with T. Jeffries (counsel to Brunswick) re issues for proposed assignment and position on same.	330.00
Apr 17, 2023	L. Hiebert	0.70	Call with M. McKie re issues for assignment and consider issues for same; prepare response to T. Jeffries (counsel to Brunswick) re assignment offer.	462.00
Apr 20, 2023	L. Hiebert	1.00	Email from T. Jeffries (counsel to Brunswick) re updated proposal for assignment and consider issues arising from same; email to M. McKie re assignment and issues arising from Brunswick positions.	660.00
May 31, 2023	L. Hiebert	0.20	Email and call with D. Shouldice (counsel to Lionsbridge) re request for records and emails with M. McKie re same.	132.00
May 31, 2023	J. Pepper	0.20	Correspondence re: website updates	91.00

PAYABLE ON RECEIPT

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GST/HST REGISTRATION # R869096974RT0005



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Deloitte Restructuring Inc.
 Re: Otso Gold Receivership

June 5, 2023
 Invoice # 698256449
 File No: 560836/000013
 Page 3

TO OUR FEES	\$ 4,117.00
Less Discount	(1,000.00)
FEE BALANCE	<u>3,117.00</u>

FEE SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Avg. Rate/Hr.</u>	<u>Amount</u>
L. Hiebert	6.10	\$ 499.69	\$ 3,048.10
J. Pepper	0.20	344.50	68.90
	<u>6.30</u>		<u>\$ 3,117.00</u>

Total Fees and Disbursements and Other Charges	<u>3,117.00</u>
GST on Fees and Taxable Disbursements and Other Charges	155.85
PST on Fees and Taxable Disbursements and Other Charges	<u>218.19</u>
TOTAL THIS INVOICE	<u>\$ 3,491.04</u>

PAYABLE ON RECEIPT
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GST/HST REGISTRATION # R869096974RT0005



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

June 5, 2023
Invoice # 698256449
LH/LH

Re: Otso Gold Receivership

File No: 560836/000013

REMITTANCE COPY

Fees	\$ 4,117.00
Less Discount	(1,000.00)
Fee Balance	<u>3,117.00</u>
Disbursements and Other Charges	0.00
GST on Fees and Taxable Disbursements and Other Charges	155.85
PST on Fees and Taxable Disbursements and Other Charges	<u>218.19</u>
Total this Invoice	<u>\$ 3,491.04</u>

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Deloitte Restructuring Inc.
 939 Granville Street
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July 10, 2023

Attention: Melinda McKie

Invoice # 698267789

Page 1

Re: Otso Gold Receivership

File No: 560836/000013

PROFESSIONAL SERVICES rendered to June 30, 2023 in connection with the above matter as described in the attached.

Fees	\$ 39,841.50
Less Discount	(247.50)
Less Fee Adjustment Discount	(2,282.17)
Fee Balance	<u>37,311.83</u>
Disbursements and Other Charges	446.50
GST on Fees and Taxable Disbursements and Other Charges	1,883.92
PST on Fees and Taxable Disbursements and Other Charges	<u>2,611.83</u>
Total this Invoice	<u><u>\$ 42,254.08</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

July 10, 2023
 Invoice # 698267789
 File No: 560836/000013
 Page 2

PROFESSIONAL SERVICES RENDERED to June 30, 2023

Nov 10, 2022	L. Hiebert	0.10	Consider terms of order arising from decision and arrangements for same.	\$ 60.50
Nov 10, 2022	J. Pepper	0.10	Correspondence re updates to Fee Approval Order and Taxation.	32.50
Nov 14, 2022	L. Hiebert	0.60	Call with M. McKie re issues for liquidation and next steps arising from same; review and consider form of order; consider correspondence from Brunswick Gold re offer and prepare response to same.	363.00
Nov 14, 2022	J. Pepper	0.50	Update Fee Approval Order re Judgement.	162.50
Nov 17, 2022	L. Hiebert	0.50	Consider issues for taxation and emails re same.	302.50
Nov 17, 2022	J. Pepper	1.20	Research re: registrar fee determination; Correspondence with L. Beatch re: the same	390.00
Nov 18, 2022	J. Pepper	1.10	Research re: registrar fee determination; Correspondence with L. Beatch re: the same	357.50
Nov 19, 2022	J. Pepper	0.90	Review and update summary of lawyer rate research; correspondence re the same.	292.50
Nov 21, 2022	J. Pepper	0.40	Review and discussion with L. Beatch re lawyer rates summary.	130.00
Nov 22, 2022	J. Pepper	5.20	Review and update research summary re lawyer rates; correspondence with L. Beatch re the same.	1,690.00
Dec 6, 2022	L. Hiebert	0.20	Consider issues for fee approval and further information required for same.	121.00
Dec 6, 2022	J. Pepper	0.40	Review junior lawyer fee summary table and draft correspondence re fee approval materials.	130.00
Dec 9, 2022	J. Pepper	0.70	Compile information for follow up emails; Draft email re: junior associates fee approval materials; Coordinate updates to fee summary table re: fee ratio Partner v. Associate.	227.50
Dec 14, 2022	J. Pepper	0.30	Correspondence re: fee approval materials inquiry.	97.50

PAYABLE ON RECEIPT
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 GST/HST REGISTRATION # R869096974RT0005



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July 10, 2023

Invoice # 698267789

File No: 560836/000013

Page 3

Deloitte Restructuring Inc.
 Re: Otso Gold Receivership

Dec 19, 2022	L. Hiebert	0.40	Consider issues and evidence for taxation/fee approval and emails re same.	242.00
Dec 19, 2022	J. Pepper	0.30	Review updates to fee rate chart; provide instructions to L. Beatch re updates to fee rate chart; correspondence with counsel re the same.	97.50
Dec 21, 2022	J. Pepper	0.20	Discussion with L. Beatch re: updates to fee rate table	65.00
Jan 4, 2023	J. Pepper	1.00	Review and update table; Consider next steps; Correspondence re: missing Court Order	325.00
Jan 5, 2023	J. Pepper	0.10	Correspondence re: Denton's order and fee approval materials	32.50
Jan 18, 2023	J. Pepper	1.80	Review table and summarize key matters;	585.00
Jan 19, 2023	J. Pepper	1.70	Review and update summary of cases; Correspondence re: the same	552.50
Jan 24, 2023	J. Cabott	1.20	Plan and prepare materials for registrars hearing;	738.00
Jan 24, 2023	J. Pepper	2.80	Meeting with L. Hiebert and J. Cabbott; correspondence re Orders and supporting Affidavits; review and update fee chart; draft L. Beatch Affidavit.	910.00
Jan 25, 2023	J. Pepper	1.40	Correspondence re updates to Fee Chart; draft L. Beatch Affidavit; update Fee Chart.	455.00
Jan 26, 2023	J. Pepper	2.50	Review and update Fee Chart and L. Beatch Affidavit.	812.50
Jan 27, 2023	J. Cabott	0.30	Plan and prepare materials for registrar's hearing;	184.50
Jan 27, 2023	J. Pepper	1.60	Review and update L. Beatch Affidavit; Compile record of documents re: fee approval hearing; Coordinate template for L. Hiebert Affidavit; Correspondence re: Deloitte Affidavit; Draft Deloitte Affidavit	520.00
Jan 29, 2023	L. Hiebert	0.50	Prepare affidavits for taxation hearing and consider issues for same.	330.00

PAYABLE ON RECEIPT

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GST/HST REGISTRATION # R869096974RT0005



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July 10, 2023

Invoice # 698267789

File No: 560836/000013

Page 4

Deloitte Restructuring Inc.
 Re: Otso Gold Receivership

Jan 30, 2023	J. Pepper	2.90	Review and finalize McKie Affidavit and Beatch Affidavit; update and finalize Fee Chart; correspondence re Notice of Hearing to service list.	942.50
Feb 7, 2023	J. Cabott	0.50	Prepare registrar's appointment materials;	307.50
Feb 7, 2023	L. Hiebert	0.20	Emails re issues for taxation of fees and consider same.	132.00
Feb 7, 2023	J. Pepper	0.20	Correspondence re Registrar hearing document updates.	65.00
Feb 8, 2023	J. Cabott	1.50	Prepare affidavit and registrar's hearing materials;	922.50
Feb 8, 2023	L. Hiebert	0.50	Review and revise evidence for taxation and consider issues for same.	330.00
Feb 8, 2023	J. Pepper	1.00	Meeting with J. Cabott re updates to Affidavits; correspondence re Notice of Hearing; update M. McKie Affidavit.	325.00
Feb 9, 2023	J. Cabott	2.60	Prepare materials for hearing of reference to registrar on BLG's fees;	1,599.00
Feb 9, 2023	L. Hiebert	0.60	Consider issues for materials to approve fees and revise same.	396.00
Feb 9, 2023	J. Pepper	1.60	Call with J. Cabott re: updates to Affidavits; Review and finalized L. Beatch Affidavit; Swear L. Beatch Affidavit; Correspondence re: the same; Consider and assign student to assist with research;	520.00
Feb 10, 2023	J. Pepper	0.70	Review and update Affidavits	227.50
Feb 13, 2023	J. Cabott	0.40	Review and revise affidavits for reference to registrar;	246.00
Feb 13, 2023	L. Hiebert	0.40	Consider issues and evidence for taxation and review and revise evidence for same.	264.00
Feb 13, 2023	J. Pepper	3.70	Draft Hiebert and Hubbard Affidavits; correspondence re McKie Affidavit; correspondence re research question; review and update Beatch Affidavit.	1,202.50
Feb 14, 2023	J. Cabott	0.40	Review, revise, advance affidavits for registrars' reference; review and consider law regarding test for reasonableness of fees;	246.00

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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July 10, 2023

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File No: 560836/000013

Page 5

Deloitte Restructuring Inc.
 Re: Otso Gold Receivership

Feb 14, 2023	L. Hiebert	0.40	Consider legal issues for fee approval application and materials for same.	264.00
Feb 14, 2023	J. Pepper	0.30	Review research re market rates; correspondence re updates to L. Beatch Affidavit.	97.50
Feb 17, 2023	J. Pepper	0.40	Finalize Beatch Affidavit, Correspondence re: affidavit updates	130.00
Feb 27, 2023	J. Cabott	0.20	Review and revise affidavits for registrars refence on BLG rates;	123.00
Feb 27, 2023	J. Pepper	0.60	Correspondence re updates on swearing McKie Affidavit; correspondence re BLG management review of BLG Affidavits.	195.00
Feb 28, 2023	J. Cabott	0.90	Revise affidavits for registrars review of BLG rates;	553.50
Feb 28, 2023	J. Pepper	2.10	Meeting and follow up calls regarding BLG affidavit language; update Hubbard Affidavit; correspondence re set up meeting for Affidavit execution.	682.50
Mar 1, 2023	J. Cabott	0.50	Prepare affidavits for registrars' hearing;	307.50
Mar 1, 2023	J. Pepper	1.00	Update and finalize Hubbard, Heibert and McKie Affidavits; correspondence re meeting to swear McKie Affidavit.	325.00
Mar 2, 2023	J. Pepper	0.40	Correspondence re: execution of J. Hubbard Affidavit; Coordinate Toronto meeting for execution of affidavit	130.00
Mar 7, 2023	N. Paunic	0.50	Confer J. Hubbard re affidavit.	247.50
Mar 7, 2023	J. Pepper	0.20	Finalize L. Hiebert Affidavit; correspondence re J. Hubbard Affidavit.	65.00
Mar 8, 2023	J. Pepper	0.10	Correspondence re status update on Affidavits and organization in preparation for filing.	32.50
Mar 21, 2023	J. Cabott	0.20	Finalize affidavit materials;	123.00
Mar 27, 2023	J. Pepper	0.10	Correspondence re execution of Affidavit.	32.50
Mar 28, 2023	J. Pepper	0.20	Correspondence re Hiebert Affidavit; swear Hiebert Affidavit.	65.00
Mar 29, 2023	J. Pepper	0.10	Correspondence re filing Affidavits.	32.50

PAYABLE ON RECEIPT

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GST/HST REGISTRATION # R869096974RT0005



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July 10, 2023

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File No: 560836/000013

Page 6

Deloitte Restructuring Inc.
 Re: Otso Gold Receivership

Mar 31, 2023	J. Pepper	0.50	Consider issues re: service of Affidavit; Correspondence re: service of Affidavits	162.50
Apr 5, 2023	J. Pepper	0.10	Correspondence re: registrar hearing and submissions	32.50
Apr 11, 2023	J. Cabott	0.20	Prepare for registrars hearing;	123.00
Apr 11, 2023	J. Pepper	2.20	Review and update Application Record Index and BOA Index; coordinate compilation of Application Record and Book of Authorities; draft submissions for hearing.	715.00
Apr 12, 2023	J. Pepper	1.20	Review and update submissions; prepare filing documentation.	390.00
Apr 13, 2023	J. Cabott	2.20	Prepare for registrars hearing;	1,353.00
Apr 13, 2023	J. Pepper	6.80	Draft written submissions for registrar hearing; review and update BoA and Hearing Record; coordinate filing of Hearing record; consider issues re service Affidavit and registrar report.	2,210.00
Apr 14, 2023	J. Cabott	4.30	Prepare for registrars hearing;	2,644.50
Apr 14, 2023	J. Pepper	3.40	Review and update written submissions; Consider form of Registrar's Report; Prepare for hearing and next steps	1,105.00
Apr 16, 2023	J. Cabott	2.50	Prepare for registrars hearing;	1,537.50
Apr 16, 2023	J. Pepper	0.10	Correspondence re preparation for hearing.	32.50
Apr 17, 2023	J. Cabott	4.70	Prepare for and attend registrars hearing; draft	2,890.50
Apr 17, 2023	J. Pepper	3.70	Prepare for registrar's hearing; Attend Registrar's hearing; Correspondence re: status of hearing; Draft report after registrar's hearing	1,202.50
Apr 18, 2023	L. Hiebert	0.30	Consider issues re potential variance of decision and emails re same.	198.00
Apr 18, 2023	J. Pepper	0.40	Correspondence re Order and next steps.	130.00
Apr 19, 2023	J. Cabott	1.20	Otso update meeting;	738.00
Apr 19, 2023	J. Pepper	1.40	Review and update Registrar's report; Consider next steps on the file; Draft correspondence re: file update and next steps	455.00

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Invoice # 698267789

File No: 560836/000013

Page 7

Deloitte Restructuring Inc.
 Re: Otso Gold Receivership

Apr 20, 2023	C.A. Connor	0.10	Engaged re obtaining Court hearing audio file transcription quotes to consider next steps.	33.00
Apr 20, 2023	J. Pepper	0.20	Coordinate transcript quote inquiry; correspondence re entered report/recommendation.	65.00
Apr 21, 2023	C.A. Connor	0.20	Request quotes re April 17 Court hearing audio file transcription and review correspondence from court reporting service re same.	66.00
Apr 24, 2023	J. Cabott	0.10	Review and consider status of matter; plan next steps;	61.50
Apr 25, 2023	C.A. Connor	0.20	Summarize and report court reporting service transcription quotes concerning April 17, 2023 hearing judgment to consider transcript request.	66.00
Apr 28, 2023	J. Cabott	0.30	Revise Masters Report;	184.50
May 8, 2023	J. Pepper	0.10	Correspondence re file status update.	32.50
May 15, 2023	J. Cabott	0.20	E-mails regarding status of form of report/order;	123.00
May 16, 2023	J. Cabott	0.10	E-mails regarding status of matter;	61.50
May 16, 2023	J. Pepper	0.10	Review emails.	32.50
Jun 7, 2023	L. Hiebert	0.20	Emails with D. Souldice (counsel to Lionsbridge) and M. McKie re electronic assets.	132.00
Jun 7, 2023	J. Pepper	0.10	Review email correspondence	32.50
Jun 14, 2023	J. Pepper	0.20	Consider registrar decision and application for fee approval and discharge.	65.00
Jun 15, 2023	L. Hiebert	0.40	Discussion with M. McKie re issues for discharge application and conclusion of proceedings; consider issues for discharge application.	264.00
Jun 16, 2023	J. Pepper	3.40	Draft fee approval application materials	1,105.00
Jun 19, 2023	J. Pepper	0.80	Review and update application materials	260.00

PAYABLE ON RECEIPT

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

GST/HST REGISTRATION # R869096974RT0005



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.
 Re: Otso Gold Receivership

July 10, 2023
 Invoice # 698267789
 File No: 560836/000013
 Page 8

TO OUR FEES	\$ 39,841.50
Less Discount	(247.50)
Less Fee Adjustment Discount	(2,282.17)
FEE BALANCE	<u>37,311.83</u>

FEE SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Avg. Rate/Hr.</u>	<u>Amount</u>
J. Cabott	24.50	\$ 615.00	\$ 15,067.50
C.A. Connor	0.50	330.00	165.00
L. Hiebert	5.30	641.32	3,399.00
J. Pepper	64.50	289.62	18,680.33
	<u>94.80</u>		<u>\$ 37,311.83</u>

DISBURSEMENTS AND OTHER CHARGES:

Non-Taxable

Agent's Account	<u>\$80.00</u>
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Total Non-Taxable Disbursements and Other Charges	<u>80.00</u>
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Taxable

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

Agent's Account	48.00	G
Agency Fees - West Coast Title Search: Court Filing ordered by Casasis, Shaianne	25.00	G
Agency Fees - West Coast Title Search: Court Filing ordered by Trafford, Kate	51.00	G
Agency Fees - West Coast Title Search: Court Filing ordered by Yip, Becky	88.50	G

PAYABLE ON RECEIPT
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 GST/HST REGISTRATION # R869096974RT0005



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July 10, 2023

Invoice # 698267789

File No: 560836/000013

Page 9

Deloitte Restructuring Inc.
 Re: Otso Gold Receivership

Agency Fees - West Coast Title Search: Court filing ordered by Bosma, Cristine K.	79.00	G
Agency Fees - West Coast Title Search: Court Filing ordered by Bosma, Cristine K.	75.00	G
	<hr/>	
Total Taxable Disbursements and Other Charges	366.50	
	<hr/>	
Total Disbursements and Other Charges		446.50
		<hr/>
Total Fees and Disbursements and Other Charges		37,758.33
		<hr/>
GST on Fees and Taxable Disbursements and Other Charges		1,883.92
PST on Fees and Taxable Disbursements and Other Charges		2,611.83
		<hr/>
TOTAL THIS INVOICE		\$ 42,254.08

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

July 10, 2023
 Invoice # 698267789
 LH/LH

Re: Otso Gold Receivership

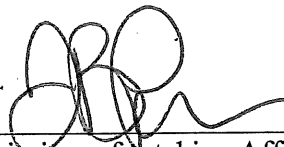
File No: 560836/000013

REMITTANCE COPY

Fees	\$ 39,841.50
Less Discount	(247.50)
Less Fee Adjustment Discount	(2,282.17)
Fee Balance	<u>37,311.83</u>
Disbursements and Other Charges	446.50
GST on Fees and Taxable Disbursements and Other Charges	1,883.92
PST on Fees and Taxable Disbursements and Other Charges	<u>2,611.83</u>
Total this Invoice	<u>\$ 42,254.08</u>

PLEASE REFER TO PAYMENT OPTIONS PAGE FOR REMITTANCE INFORMATION.

This is **Exhibit "B"** referred to in **Affidavit #3**
Of **Lisa C. Hiebert** made before me
on July 14, 2023



A Commissioner for taking Affidavits
for British Columbia

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

Invoice No.	Invoice Date	Net Fees	Disbursements	GST	PST	Total
698075769	February 4, 2022	\$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
698205392	December 31, 2022	\$20,000.00	\$205.50	\$1,006.28	\$1,400.00	\$22,611.78
698222175	March 6, 2023	\$1,452.00	\$0.00	\$72.60	\$101.64	\$1,626.24
698256449	June 5, 2023	\$3,117.00	\$0.00	\$155.85	\$218.19	\$3,491.04
698267789	July 10, 2023	\$37,311.83	\$446.50	\$1,883.92	\$2,611.83	\$42,254.08
		\$233,643.33	\$1,521.66	\$11,743.26	\$16,355.05	\$263,263.30

IN THE MATTER OF THE RECEIVERSHIP OF OTSO GOLD CORP. Summary of BLG's Professional Fees by Person						
Name	Position	Total Hours	Standard Rate 2022	Standard Rate 2023	Effective Rate	Total Fees
Matthew Kronby	Partner, International Trade and Investment	0.8	\$1,150.00	\$1,245.00	\$1,095.43	\$876.34
Kent Kufeldt	National Business Leader, Securities and Capital Markets	3.5	\$970.00	\$1,050.00	\$882.03	\$3,087.10
Beverly Gilbert	National Leader, Commodity Tax	0.9	\$880.00	\$950.00	\$800.83	\$720.75
Randy Morphy	Partner, Tax	0.3	\$870.00	\$945.00	\$791.73	\$237.52
Magnus Verbrugge	Senior Counsel, Financial Services	2.1	\$790.00	\$855.00	\$759.65	\$1,595.27
Lisa Hiebert	Partner, Financial Services	274.2	\$605.00	\$660.00	\$557.55	\$152,879.98
Jake Cabott	Partner, Commercial Litigation.	24.5	\$565.00	\$615.00	\$615.00	\$15,067.50
Danielle Lewchuk	Partner, Tax	3.7	\$565.00	\$615.00	\$514.17	\$1,902.44
Ryan Laity	Partner, Financial Services	8.9	\$560.00	\$610.00	\$512.53	\$4,561.56
Ryan Laity	Partner, Financial Services	*0.7	\$545.00	\$595.00	\$495.97	\$0.00
Parisa Hurst	Senior Associate, Commercial Real Estate	*0.5	\$350.00	\$495.00	\$0.00	\$0.00
Natalia Paunic	Associate, Disputes	150	\$395.00	\$455.00	\$317.22	\$47,582.99
Jennifer Pepper	Associate, Financial Services	**61.4	\$250.00	\$265.00	N/A	N/A
Lucas Beatch	Associate/Articling Student, Financial Services	10.6	\$305.00	\$330.00	\$253.86	\$2,690.91
Catherine Connor	Paralegal, Commercial Litigation	0.2	\$275.00	\$300.00	\$249.10	\$49.82
Victoria Smith	Paralegal, Due Diligence	0.6	\$265.00	\$290.00	\$241.15	\$144.69
Pippa Sugimoto	Paralegal, Commercial Real Estate	3	\$225.00	\$250.00	\$213.41	\$640.24
Caitlin Hansen	Paralegal, Commercial Litigation	3.9	\$215.00	N/A	\$195.66	\$763.07
Cassandra Lopes	Paralegal, Commercial Real Estate					
TOTAL		488.90				\$233,643.33

*Mr. Laity's time was charged at \$0.00 as a courtesy to the Receiver on Invoice 698094978. Ms. Paunic's time was charged at \$0.00 as a courtesy to the Receiver on Invoice 698267789.

**Mr. Beatch's time was written-off for this file as a courtesy to the Receiver.

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 #3 OF LISA C. HIEBERT

BORDEN LADNER GERVAIS LLP
1200 Waterfront Centre
200 Burrard Street
P.O. Box 48600
Vancouver, B.C., V7X 1T2
Telephone: (604) 632-3425
Client/Matter: 560836/00013
Attn: Lisa Hiebert