



This is the #1 Affidavit of Paul Chambers in this case and was made on March 18, 2025.

**NO. S-234092**  
**Vancouver Registry**

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

**IN THE MATTER OF THE RECEIVERSHIP OF  
POLYCAN HEALTH CENTRE (CANADA) INC.**

**BETWEEN:**

**BANK OF MONTREAL**

**PETITIONERS**

**AND:**

**POLYCAN HEALTH CENTRE (CANADA) INC., ANQI MAI, ALSO  
KNOWN AS AN QI MAI, ALSO KNOWN AS ANDREW MAI,  
WEIDONG ZHU, ALSO KNOWN AS WEI DONG ZHU, ALSO  
KNOWN AS WILLIAM ZHU, SUI ZHANG AND HUA XU**

**RESPONDENT**

**AFFIDAVIT #1 OF PAUL CHAMBERS**

I, Paul Chambers, licensed insolvency trustee, of 410 West Georgia Street, Level 19, Vancouver, British Columbia, MAKE OATH AND SAY AS FOLLOWS:

1. I am a Senior Vice President of Deloitte Restructuring Inc. ("**Deloitte**"), the court-appointed receiver (the "**Receiver**") without security, of all of the assets, undertakings and property of Polycan Health Centre (Canada) Inc. (the "**Debtor**") 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. Attached and marked as **Exhibit "A"** to this Affidavit are true copies of the Receiver's final accounts in this matter (collectively, the "**Final Accounts**"), as follows:

Invoice #	Invoice Date	Billing period	Hours billed	Fees	Disbursements	GST	Total
8004406266	2024-01-30	November 22, 2023 to December 8, 2023	166.2	\$ 71,665.00	\$ -	\$ 3,583.25	\$ 75,248.25
8004397359	2024-01-29	December 9, 2023 to January 2, 2024	90.5	37,640.00	110.32	1,887.52	39,637.84
8004431903	2024-02-06	January 3, 2024 to January 31, 2024	122.5	46,417.50	1,971.16	2,419.43	50,808.09
8004604547	2024-03-27	February 1, 2024 to February 29, 2024	172.4	68,735.00	1,741.00	3,523.80	73,999.80
8004741474	2024-05-03	March 1, 2024 to April 30, 2024	54.5	18,045.00	756.84	940.09	19,741.93
8005022718	2024-07-29	May 1, 2024 to June 30, 2024	27.9	9,777.50	134.28	495.59	10,407.37
8005629746	2025-01-28	July 1, 2024 to January 20, 2025	37.7	13,020.00	439.55	672.98	14,132.53
<b>Total</b>			<b>671.70</b>	<b>\$ 265,300.00</b>	<b>\$ 5,153.15</b>	<b>\$ 13,522.66</b>	<b>\$ 283,975.81</b>

3. As detailed in the Final Accounts, from November 22, 2023 to January 20, 2025, the Receiver's fees and disbursements, inclusive of taxes, amounted to a total of \$283,975.81, which consists of \$265,300.00 in fees, \$5,153.15 in disbursements, and \$13,522.66 in GST. I estimate that the cost for the Receiver to conclude the proceedings will be \$5,000 to \$7,500 (exclusive of taxes).
4. Attached and marked as **Exhibit "B"** to this Affidavit is a summary of the fees set out in the Final Accounts, calculated on the basis of the hours spent by the Receiver's personnel, multiplied by the applicable standard hourly rates charged by Deloitte in its insolvency practice. The total time expended by the Receiver's personnel in relation to the Final Accounts was 671.70 hours.
5. To the best of my knowledge, information and belief, the information contained in the Final 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 is true and accurate in all respects.
6. The details of the work carried out by the Receiver in these proceedings are set out in the Receiver's four reports to the Court including the Receiver's first report to Court dated February 9, 2024 (the **"First Report"**), the Receiver's confidential supplement to the First Report dated February 9, 2024 (the **"Confidential Supplement"**), the Receiver's supplement to the First Report (the **"Supplement"**) dated February 25, 2024, and the Receiver's second report to Court dated March 18, 2025 (the **"Second Report"**).
7. I have reviewed the Final Accounts, the First Report, the Confidential Supplement, the Supplement and the Second Report and confirm that, to the best of my knowledge, information and belief:

- (a) the work detailed therein was carried out by the Receiver, and that such work was necessary to the Receiver completing its obligations in these proceedings and the fees and disbursements were properly incurred and fair and reasonable in the circumstances;
- (b) the work completed by the Receiver was delegated to the appropriate Deloitte professionals, according to their seniority and hourly rates, and performed in a prudent and economical manner; and
- (c) the Receiver's fees in this matter are consistent with fees charged by other trustee firms of a similar size for work of a similar nature and complexity in British Columbia.

8. I have reviewed the following accounts of DLA Piper (Canada) LLP ("DLA"), the Receiver's legal counsel in this matter:

Invoice #	Invoice Date	Billing period	Fee	Disbursements	GST	PST	Total
2244318	2023-12-05	November 23, 2023 to November 30, 2023	\$ 4,560.00	\$ 30.59	\$ 228.18	\$ 319.20	\$ 5,137.97
2253153	2024-01-11	December 1, 2023 to December 31, 2023	12,267.50	17.00	613.54	858.73	13,756.77
2259562	2024-02-07	January 1, 2024 to January 31, 2024	16,517.50	8.50	825.96	1,156.23	18,508.19
2268097	2024-03-14	February 1, 2024 to February 29, 2024	45,555.50	292.50	2,280.86	3,188.89	51,317.75
2275479	2024-04-11	March 1, 2024 to March 31, 2024	360.00	40.00	18.75	25.20	443.95
2311174	2024-10-16	April 1, 2024 to September 30, 2024	1,275.00	-	63.75	89.25	1,428.00
2347463	2025-01-24	October 1, 2024 to December 31, 2024	1,497.50	-	74.88	104.83	1,677.21
<b>Total</b>			<b>\$ 82,033.00</b>	<b>\$ 388.59</b>	<b>\$ 4,105.92</b>	<b>\$ 5,742.33</b>	<b>\$ 92,269.84</b>

(collectively, the "Final DLA Accounts")

9. The Final DLA Accounts were provided to the Receiver on a regular basis, and I am satisfied that the work detailed in these accounts was completed by DLA at the request of the Receiver and was necessary in the circumstances. In addition to the above fees, between January 1, 2025 and March 11, 2025, DLA incurred approximately \$1,848 in fees, taxes and disbursements and I estimate a further cost for DLA Piper to conclude the proceedings will be \$5,000 to \$7,500 (exclusive of taxes). Based on my experience as an insolvency professional, I believe that DLA's standard fees and rates are consistent with the market for work of a similar nature and complexity in British Columbia.
10. This affidavit is sworn in support of an application for approval of the fees incurred by the Receiver and DLA in these proceedings.

) ) ) ) ) ) ) )

Paul Chambers

**PAUL CHAMBERS**

**CHELSEA COLWILL**  
*Barrister & Solicitor*  
**DELOITTE LEGAL CANADA LLP**  
Suite 2000C  
410 West Georgia Street  
Vancouver, B.C. V6B 0S7  
Telephone: 604-689-4466

This is **Exhibit "A"** referred to in Affidavit #1 of Paul Chambers made before me on this 18<sup>th</sup> day of March, 2025.

*Chell*

A Commissioner for taking Affidavits for British Columbia

**CHELSEA COLWILL**  
*Barriester & Solicitor*  
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**In The Matter Of The Receivership Of Polycan Health Centre (Canada) Inc.**  
**Summary of Receiver's Accounts**

Invoice #	Invoice Date	Billing period	Hours billed	Fees	Disbursements	GST	Total
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This is **Exhibit "B"** referred to in Affidavit #1 of Paul Chambers made before me on this 18<sup>th</sup> day of March, 2025.

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**In the Matter of the Receivership of Polycan Health Centre (Canada) Inc.**  
**Summary of Receiver's Hours and Fees**

Name	Position	Hours	Rate/Hour	Total
Jeff Keeble	Partner	47.2 \$	675.00 \$	31,860.00
Melinda McKie	Partner	0.1	675.00	67.50
Paul Chambers	Director	181.3	575.00	104,247.50
Himanshu Tanwar	Senior Manager	1.0	500.00	500.00
Todd Drew	Senior	15.3	350.00	5,355.00
Jordan Yin	Senior	184.6	350.00	64,610.00
Kaley Dowler	Senior	0.6	350.00	210.00
Xinyi Bao	Analyst	202.6	250.00	50,650.00
Teresa Wong	Analyst	39.0	200.00	7,800.00
<b>Total</b>		<b>671.70</b>	<b>\$</b>	<b>265,300.00</b>