



This is the 2<sup>nd</sup> affidavit of  
Jennifer Alambre in this case and was  
made on February 26, 2025

No. S-248267  
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,  
R.S.C. 1985, c. C-36

AND

IN THE MATTER OF THE CANADA BUSINESS CORPORATIONS ACT, R.S.C. 1985, c. C-44,  
THE BUSINESS CORPORATIONS ACT, S.B.C. 2002, c. 57

AND

IN THE MATTER OF SAN INDUSTRIES LTD., ACORN FOREST PRODUCTS LTD., AXON  
LUMBER LTD., COULSON MANUFACTURING 2017 LTD., SAN CEDAR DIRECT SALES  
LTD., SAN FOREST PRODUCTS LTD., SAN HOLDINGS INC., SUPER-CUT LUMBER  
INDUSTRIES LTD., 1224676 B.C. LTD. 1260729 B.C. LTD., MOUNTAINSIDE LOGGING LTD.,  
1170518 B.C. LTD., 1175465 B.C. LTD., SAN FARMING LTD., SAN FOREST  
SPECIALTY LTD. and SAN TERMINALS INC.

PETITIONERS


**AFFIDAVIT**

I, Jennifer Alambre, of Suite 3500 – 1133 Melville Street, Vancouver, Legal Administrative  
Assistant, SWEAR THAT:

1. I am a Legal Administrative Assistant at Blake, Cassels & Graydon LLP, the  
solicitors for Deloitte Restructuring Inc., the Monitor in this proceeding, and as such I have  
personal knowledge of the matters deposed to in this Affidavit.
2. Attached as **Exhibit "A"** to this Affidavit is a copy of an e-mail from Mike Ryles to  
Yiota Petrakis, legal assistant at Blake, Cassels & Graydon LLP, copying Peter Rubin and  
Claire Hildebrand, dated February 20, 2025 (with attachments).

3. Attached as **Exhibit "B"** to this Affidavit is a copy of an e-mail from Mr. Ryles to Paul Chambers, Mr. Rubin, and Ms. Hildebrand, dated February 25, 2025 (with attachments).

SWORN BEFORE ME at Vancouver,  
British Columbia on February 26, 2025.

  
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A Commissioner for Taking Affidavits  
for British Columbia.

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Jennifer Alambre

**MYIM ISALAH BAKAN KLINE**  
*Barrister & Solicitor*  
**BLAKE, CASSELS & GRAYDON LLP**  
1133 Melville Street  
Suite 3500, The Stack  
Vancouver, B.C. V6E 4E5  
604-631-3328

This is **Exhibit "A"** referred to in the Affidavit of Jennifer Alambre made before me at Vancouver, British Columbia, this 26<sup>th</sup> day of February 2025.



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A Commissioner for the taking of Affidavits for  
*British Columbia*

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**From:** MIKE RYLES <cmryles@shaw.ca>  
**Sent:** Thursday, February 20, 2025 11:02 AM  
**To:** Petrakis, Yiota  
**Cc:** Rubin, Peter; Hildebrand, Claire  
**Subject:** Re: In the Matter of San Industries Ltd., SCBC Vancouver Registry Action No. S-248267  
**Attachments:** Application Response Page 1.jpg; Application Response Page 2.jpg

• External Email | Courrier électronique externe •

Please find attached Letter (2 pages) signed and dated February 20 2025 in response to application.

Mike Ryles

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**From:** "Petrakis, Yiota" <yiota.petrakis@blakes.com>  
**To:** "cmryles" <cmryles@shaw.ca>  
**Cc:** "Rubin, Peter" <peter.rubin@blakes.com>, "Hildebrand, Claire" <claire.hildebrand@blakes.com>  
**Sent:** Wednesday, February 19, 2025 4:00:52 PM  
**Subject:** RE: In the Matter of San Industries Ltd., SCBC Vancouver Registry Action No. S-248267

Good afternoon,

Further the email below, attached are filed copies of the following:

1. Notice of Application of the Monitor returnable February 21, 2025 at 10:00 a.m.; and
2. Monitor's Fifth Report dated February 18, 2025.

Thank you,

**Yiota Petrakis** (she, her, hers)  
 Legal Administrative Assistant  
[yiota.petrakis@blakes.com](mailto:yiota.petrakis@blakes.com)  
 T. +1-604-631-3310

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Blake, Cassels & Graydon LLP  
 3500 - 1133 Melville Street, Vancouver, BC V6E 4E5 ([Map](#))  
[blakes.com](http://blakes.com) | [LinkedIn](#)

 Blakes Means Business

This email communication is CONFIDENTIAL AND LEGALLY PRIVILEGED. If you are not the intended recipient, please notify me at the telephone number shown above or by return email and delete this communication and any copy immediately. Thank you. Ce message électronique peut contenir des renseignements CONFIDENTIELS ET PRIVILÉGIÉS. Si ce message vous est parvenu par erreur, veuillez immédiatement m'en aviser par téléphone ou par courriel et en détruire toute copie. Merci.

**From:** Petrakis, Yiota  
**Sent:** Tuesday, February 18, 2025 3:29 PM  
**To:** cmryles@shaw.ca

**Cc:** Rubin, Peter <PETER.RUBIN@blakes.com>; Hildebrand, Claire <claire.hildebrand@blakes.com>

**Subject:** In the Matter of San Industries Ltd., SCBC Vancouver Registry Action No. S-248267

Good afternoon,

Please see attached correspondence of today's date and enclosures sent on behalf of Claire Hildebrand.

Thank you,

**Yiota Petrakis** (she, her, hers)  
Legal Administrative Assistant to  
Michael Howcroft, Joshua Hutchinson,  
Claire Hildebrand, Victor Lima and  
Soheila Ebrahimi-Louyeh, Articling Student  
[yiota.petrakis@blakes.com](mailto:yiota.petrakis@blakes.com)  
T. +1-604-631-3310

Attention Paul Chambers

Central Island Excavating has not received the court stamped documents until todays date February 20<sup>th</sup> 2025 at approximately 10am when the secretary is in the office. The court date set for February 21<sup>st</sup> 2025 in Vancouver BC does NOT give me enough time to appear and or seek proper legal counsel which I am entitled to. Please be advised I am not able to make this date with such a limited time frame.

The 370 log loader was returned to me November 1<sup>st</sup> 2024 by the San Group (Suki). The amount owing is \$55,000. The agreement as of November 1<sup>st</sup> 2024 between Suki and myself was to bring the log loader down to the Silverside Job site in hopes it would generate enough income to cover the remaining cost owed as set out in the contract at which time Suki would be able to pay off the remaining amount and I would then transfer ownership back to San Industries as the contract would be then complete. If the Silverside job did not generate enough income to satisfy the remaining amount owing then Central Island Excavating was to keep ownership of the 370 log loader as the terms of the contract were not met and Suki agreed to this creating a verbal contract.

Return of Equipment Order

item 15

"In December 2024 CIE seized the Log Loader, which the Monitor intends to market and sell as part of the San Group's assets pursuant to the SSIP."

This statement is false – November 1<sup>st</sup> 2024 was returned to Central Island Excavating due to lack of funds which was agreed upon between Suki and myself.

## Item 16

"The Monitor has repeatedly demanded the return of the Log Loader from CIE, but it has not been returned. Accordingly the Monitor is seeking an Order that the log loader be returned to the Coulson Mill by no later than February 28<sup>th</sup> 2025"

This statement is also false – I did not receive any calls from the Monitor. I received one call from Kevin Sommerfield

Please remit \$55,000 Canadian dollars which is left owing on the Log Loader in order to obtain the machine back to Coulson's Mill as you have requested. In addition Central Island Excavating will be charging San Industries the appropriate low bedding fees that were required which amount to \$2400.00

Mike Ryles

President

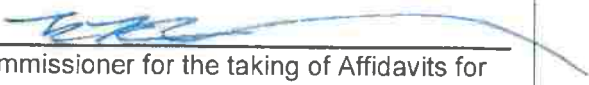
Central Island Excavating Ltd

February 20, 2025 Port Alberni BC



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This is **Exhibit "B"** referred to in the Affidavit of Jennifer Alambre made before me at Vancouver, British Columbia, this 26<sup>th</sup> day of February 2025.



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A Commissioner for the taking of Affidavits for  
*British Columbia*



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**From:** MIKE RYLES <cmryles@shaw.ca>  
**Sent:** Tuesday, February 25, 2025 11:17 AM  
**To:** Chambers, Paul; Hildebrand, Claire; Rubin, Peter  
**Subject:** Ownership Agreement - Return of Log Loader  
**Attachments:** Ownership Agreement.jpg

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Please find attached signed Ownership agreement between myself and Suki dated October 24 2024.

Please be advised the location of the Log Loader is on the Hupacasath First Nations Woodlot 1902 on Kitsuksis Rd in Port Alberni BC.

Mike Ryles  
Central Island Excavating Ltd.

October 24, 2024

**Ownership Agreement**

**San Forest Products Ltd.**

**&**

**Central Island Excavating Ltd.**

It is agreed upon that due to the unpaid amount left owing on the previous set out contract dated November 11, 2023 for the 370 Log Loader sold to San Forest Products Ltd. the Log Loader's ownership is relinquished back to Central Island Excavating upon signature of this agreement.

The Log Loader now owned by Central Island Excavating will be sent to Silverside job site in hopes it can generate enough revenue from San Forest Products Ltd that will satisfy the remaining amount owed which is approximately **\$55,000.00** CAD in which case Central Island Excavating Ltd agrees to sign ownership back to San Forest Products Ltd. at that time.

If the Log Loader is NOT able to generate this revenue ownership will remain with Central Island Excavating Ltd. for the foreseeable future.

Sukhjot Sanghera

Date: Oct 24/2024



Mike Ryles

Date: Oct 24/2024

