



This is the 3rd affidavit of
Jennifer Alambre in this case and was
made on March 3, 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

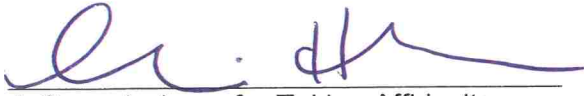
AFFIDAVIT

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 to this affidavit and marked as **Exhibit "A"** is a copy of an email from Dalvir Judge of Jace Trucklines Ltd. to Peter Rubin dated February 27, 2025 (with attachment).

SWORN BEFORE ME at Vancouver,
British Columbia on March 3, 2025.

A handwritten signature in blue ink, appearing to be 'C. Hildebrand', written over a horizontal line.

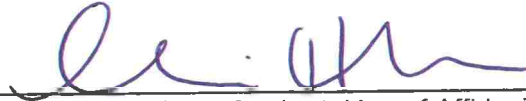
A Commissioner for Taking Affidavits
for British Columbia.

A handwritten signature in blue ink, appearing to be 'Jennifer Alambre', written over a horizontal line.

Jennifer Alambre

CLAIRE I. HILDEBRAND
Barrister & Solicitor
BLAKE, CASSELS & GRAYDON LLP
1133 Melville Street
Suite 3500, The Stack
Vancouver, B.C. V6E 4E5
604-631-3331

This is **Exhibit "A"** referred to in the Affidavit of Jennifer Alambre made before me at Vancouver, British Columbia, this 3rd day of March 2025.



A Commissioner for the taking of Affidavits for
British Columbia

CLAIRE I. HILDEBRAND
Barrister & Solicitor
BLAKE, CASSELS & GRAYDON LLP
1133 Melville Street
Suite 3500, The Stack
Vancouver, B.C. V6E 4E5
604-631-3331

From: Jace Trucklines - Dalvir <dalvir@jacetrucklines.com>
Sent: Thursday, February 27, 2025 9:39 AM
To: Rubin, Peter
Cc: Hildebrand, Claire
Subject: RE: Jace Trucklines Ltd.
Attachments: 0884_001.pdf

Importance: High

• External Email | Courrier électronique externe •

HI Mr. Rubin,
 Please find Unfilled Copy, as my agent working on filling this asap
 Please bring this in Judge attention !
 Thanks !

Dalvir Jhudge
Jace Trucklines Ltd.
Unit#211, 14770-64 Ave,
Surrey, B.C V3S 1X7
PH.604.593.1400
FX.604.593.1055
Cell.604.690.4142
Web. <https://jacetrucklines.com/>

Note - Our address has been changed. Please update your records.



MC-825167 | USDOT-2399449 | FEIN-98-1098649 | NSC-202-099-055 |

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****Rates/Quotes are valid for 7 days unless otherwise specified****

From: Rubin, Peter <peter.rubin@blakes.com>
Sent: Friday, February 21, 2025 5:25 PM
To: Jace Trucklines - Dalvir <dalvir@jacetrucklines.com>
Cc: Hildebrand, Claire <claire.hildebrand@blakes.com>
Subject: Jace Trucklines Ltd.

Mr. Jhudge,

Please find attached the Order of the BC Supreme Court granted today related to Jace Trucklines Ltd. The relief sought by the Monitor in paragraph 1(a) of the Notice of Application filed February 18, 2025 has been adjourned to February 27, 2025.

Peter

Peter Rubin*
 Partner
peter.rubin@blakes.com
 T. +1-604-631-3315
 * denotes law corporation

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

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No.S-248267
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT,
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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.,
AND THOSE PARTIES LISTED ON SCHEDULE "A"

PETITIONERS

APPLICATION RESPONSE

Application response of: Jace Trucklines Ltd. (the "Application Respondent or Jace")

THIS IS A RESPONSE TO the notice of application of the Plaintiff filed 18/FEB/2025.

The application respondent estimates that the application will take 60 minutes.

TAKE NOTICE that the Application will be made by the Applicant to the presiding Judge at the Courthouse located at 800 Smithe Street, Vancouver, British Columbia on February 27, 2025, at 9:45 a.m.

Part 1: ORDERS CONSENTED TO

The application respondent consents to the granting of the orders set out in the following paragraphs of Part 1 of the notice of application on the following terms: none

Part 2: ORDERS OPPOSED

The application respondent opposes the granting of the orders set out in paragraphs of Part 1 of the notice of application: none

Part 3: ORDERS ON WHICH NO POSITION IS TAKEN

The application respondent takes no position on the granting of the orders set out in paragraphs of Part 1 of the notice of application: All

Part 4: FACTUAL BASIS

1. The Application Respondent, Jace Trucklines Ltd., is a trucking company that has previously delivered loads for the Petitioner, San Industries Ltd. ("San").
2. Jace received a trucking load from San in early December to deliver to the United States. The load was lumber.
3. Jace had previously delivered several loads for San between March and November 2024, for which San failed to provide payment for deliveries.
4. Jace is owed in excess of \$100,000 from San for previous loads that were delivered.
5. Jace did not deliver its final load of lumber which it picked up on November 28, 2024, and instead ended up selling the load to set-off the debt owed to it. The load was sold on November 29, 2024. San's declared value for the load was \$13,598.43 USD. Jace sold the lumber for \$9,000 CAD cash.
6. At all times, Jace was not aware of any court orders with respect to San.

Part 5: LEGAL BASIS

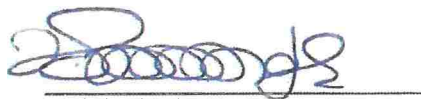
1. none

Part 6: MATERIAL TO BE RELIED ON

1. none
- [X] The application respondents have not filed in this proceeding a document that contains the application respondent's address for service.

Jace Trucklines Ltd.
 Unit 211, 14770 64th Avenue Street, Surrey, BC V3W 3M8
 Email:
 Phone: 604-593-1400

Date: February 25, 2025



Dalvir Jhudge
 Director of the Application Respondent