



This is the 2nd Affidavit
of Suzanne Volkow in this case
and was made on July 2, 2024

No. H240524
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

ROYAL BANK OF CANADA

PETITIONER

AND:

WHITEWATER CONCRETE LTD. et al

RESPONDENTS

AFFIDAVIT

I, SUZANNE VOLKOW, of 2900 – 550 Burrard Street, Vancouver British Columbia,
SWEAR, THAT:

1. I am a paralegal in the law firm of Fasken Martineau DuMoulin LLP, solicitors for the Petitioner, and as such have personal knowledge of the facts hereinafter deposed to, save where stated to be on information and belief, and where so stated I verily believe them to be true.
2. I am advised by John Lee, Senior Lead at Royal Bank of Canada, that:
 - (a) the prime lending rate of interest of HSBC Bank Canada was 7.2% per annum from September 12, 2023 to March 28, 2024;
 - (b) the prime lending rate of interest of Royal Bank of Canada was 7.2% per annum from March 29, 2024 to June 5, 2024; and
 - (c) the prime lending rate of interest of Royal Bank of Canada was 6.95% per annum from June 6, 2024 to date.

3. Attached hereto as **Exhibit "A"** is an interest calculation based on the principal amount of \$100,000 from September 12, 2023 to July 2, 2024 at the following interest rates:

- (a) 8.3% (prime plus 1.1%) per annum from September 12, 2023 to September 30, 2023;
- (b) 8.8% (prime plus 1.5%) per annum from October 1, 2023 to June 5, 2024; and
- (c) 8.55 % (prime plus 1.5%) per annum from June 6, 2024 to July 2, 2024.

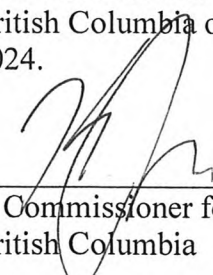
4. Attached hereto as **Exhibit "B"** is an interest calculation based on the principal amount of \$1,000,000 from September 12, 2023 to July 2, 2024 at the following interest rates:

- (a) 8.3% (prime plus 1.1%) per annum from September 12, 2023 to September 30, 2023;
- (b) 8.8% (prime plus 1.5%) per annum from October 1, 2023 to June 5, 2024; and
- (c) 8.55 % (prime plus 1.5%) per annum from June 6, 2024 to July 2, 2024.

5. Attached hereto as **Exhibit "C"** is an interest calculation based on the principal amount of \$450,000 from September 12, 2023 to July 2, 2024 at the following interest rates:

- (a) 8.3% (prime plus 1.1%) per annum from September 12, 2023 to September 30, 2023;
- (b) 8.8% (prime plus 1.5%) per annum from October 1, 2023 to June 5, 2024; and
- (c) 8.55 % (prime plus 1.5%) per annum from June 6, 2024 to July 2, 2024.

SWORN BEFORE ME at Vancouver,
British Columbia on the 2nd day of July,
2024.


A Commissioner for taking Affidavits for
British Columbia


SUZANNE VOLKOW

KIBBEN JACKSON
Barrister & Solicitor
Fasken Martineau DuMoulin LLP
2900 - 550 Burrard Street
Vancouver, BC V6C 0A3
604 631 4786

Craig, Kyle, Krystle and Bastian

Date: 02/07/2024

Initial Principal \$100,000.00
 Positive Payments = 0 Negative Payments = 0
 Simple Interest
 Interest rate (02/07/2024) 8.5500 %
 Payment Frequency Irregular
 Origination Date 12/09/2023
 First Payment 30/09/2023

	Start Date	Pmt Date	Payment	Rate	Principal	Interest	Balance	Comment
1	12/09/2023	30/09/2023	\$0.00	8.3000 %	\$0.00	\$409.32	\$100,409.32	
2	30/09/2023	06/06/2024	\$0.00	8.8000 %	\$0.00	\$6,027.40	\$106,436.72	
3	06/06/2024	02/07/2024	\$0.00	8.5500 %	\$-7,044.10	\$607.38	\$107,044.10	

Grand Total

Initial Principal \$100,000.00
 Additional Principal \$0.00

 Total Principal \$100,000.00
 Total Interest \$7,044.10
 Total Payments \$0.00
 Balance \$107,044.10
 Method Simple Interest
 Day Count Actual/Actual
 Payment Method Normal
 Daily interest on Principal balance \$23.36
 (\$100,000.00 - 8.5500 %)
 (no interest on Interest balance)

This is Exhibit A referred to in the
 affidavit of Suzanne Volkow
 made before me on this 2nd
 day of July 2024

 A Commissioner for taking
 Affidavits for British Columbia

Bastian and Krystal

Date: 02/07/2024

Initial Principal \$1,000,000.00
 Positive Payments = 0 Negative Payments = 0
 Simple Interest
 Interest rate (02/07/2024) 8.5500 %
 Payment Frequency Irregular
 Origination Date 12/09/2023
 First Payment 30/09/2023

	Start Date	Pmt Date	Payment	Rate	Principal	Interest	Balance	Comment
1	12/09/2023	30/09/2023	\$0.00	8.3000 %	\$0.00	\$4,093.15	\$1,004,093.15	
2	30/09/2023	06/06/2024	\$0.00	8.8000 %	\$0.00	\$60,273.97	\$1,064,367.12	
3	06/06/2024	02/07/2024	\$0.00	8.5500 %	\$-70,440.89	\$6,073.77	\$1,070,440.89	

Grand Total

Initial Principal \$1,000,000.00
 Additional Principal \$0.00

 Total Principal \$1,000,000.00
 Total Interest \$70,440.89
 Total Payments \$0.00
 Balance \$1,070,440.89
 Method Simple Interest
 Day Count Actual/Actual
 Payment Method Normal
 Daily Interest on Principal balance \$233.61
 (\$1,000,000.00 - 8.5500 %)
 (no interest on Interest balance)

This is Exhibit B referred to in the
 affidavit of Suzanne Volkow
 made before me on this 2nd
 day of July 2024

 A Commissioner for taking
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Kyle and Craig		Date:	02/07/2024
Initial Principal	\$450,000.00		
Positive Payments = 0	Negative Payments = 0		
Simple Interest			
Interest rate (02/07/2024)	8.5500 %		
Payment Frequency	Irregular		
Origination Date	12/09/2023		
First Payment	30/09/2023		

	Start Date	Pmt Date	Payment	Rate	Principal	Interest	Balance	Comment
1	12/09/2023	30/09/2023	\$0.00	8.3000 %	\$0.00	\$1,841.92	\$451,841.92	
2	30/09/2023	06/06/2024	\$0.00	8.8000 %	\$0.00	\$27,123.29	\$478,965.21	
3	06/06/2024	02/07/2024	\$0.00	8.5500 %	\$-31,698.41	\$2,733.20	\$481,698.41	

Grand Total

Initial Principal	\$450,000.00
Additional Principal	\$0.00
Total Principal	\$450,000.00
Total Interest	\$31,698.41
Total Payments	\$0.00
Balance	\$481,698.41
Method	Simple Interest
Day Count	Actual/Actual
Payment Method	Normal
Daily interest on Principal balance (\$450,000.00 - 8.5500 %)	\$105.12
(no interest on Interest balance)	

This is Exhibit C referred to in the
 affidavit of Suzanne Volkow
 made before me on this 2nd
 day of July 2024
 A Commissioner for taking
 Affidavits for British Columbia