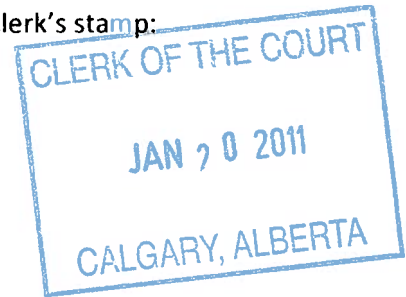


Clerk's stamp:



COURT FILE NUMBER 1001-03215
COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY
PLAINTIFF(S) **FIRST CALGARY SAVINGS & CREDIT UNION LTD.**
DEFENDANT(S) **PERERA SHAWNEE LTD., PERERA DEVELOPMENT CORPORATION, DON L. PERERA and SHIRANIE M. PERERA**
DOCUMENT **AFFIDAVIT**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT



FRASER MILNER CASGRAIN LLP
Bankers Court
15th Floor, 850 - 2nd Street S.W.
Calgary, Alberta T2P 0R8
Attention: David W. Mann / Rebecca L. Lewis
Ph. (403) 268-7097/6354 Fx. (403) 268-3100
File No.: 545112-1

AFFIDAVIT OF BRUCE ALGER

Sworn on January 20, 2011

I, Bruce Alger, of the City of Calgary, in the Province of Alberta, SWEAR AND SAY THAT:

1. I am a member of the Board of Directors of both the Canadian Association of Insolvency and Restructuring Professionals ("**CAIRP**") and the Alberta Association of Insolvency and Restructuring Professionals ("**AAIRP**") and I am authorized to swear this Affidavit on behalf of both CAIRP and AAIRP (collectively, the "**Associations**"). As such, I have personal knowledge of the matters herein deposed to except where stated to be based on information and belief, in which case I do verily believe the same to be true.

CAIRP

2. CAIRP is the national professional organization which represents general members acting as trustees in bankruptcy, receivers, agents, monitors and consultants in insolvency matters. In

addition, CAIRP has non-general members in the articling, life and corporate categories. In order to be a member of CAIRP, a person must either: (i) having been an articling member, have completed the CIRP Qualification Program (CQP) or such other Course of Study as has been designated by the CAIRP Board of Directors, and have passed the National Insolvency Examination or such other examination as has been designated by the CAIRP Board of Directors; or (ii) hold a trustee licence issued by the Superintendent of Bankruptcy. CAIRP currently has 887 general members and 537 articling, life and corporate category members. I am informed by an examination of the website of the Office of the Superintendent of Bankruptcy that there are currently 1022 individual trustees registered to practice in Canada. The total number of licensed trustees includes non-practising trustees and employees of the Office of the Superintendent of Bankruptcy. The majority of practising trustees are members of CAIRP.

3. CAIRP is a non-profit corporation, established in 1979 to advance the practice of insolvency administration and the public interest related to it.
4. CAIRP's mission statements are:
 - (a) Educate and support its members in providing insolvency, restructuring and related advisory services in a manner that instils the highest degree of public trust; and
 - (b) Advocate for a fair, transparent and effective system of insolvency and restructuring administration throughout Canada.
5. CAIRP's vision is that its members are recognized leaders in providing solutions to financially challenged individuals and businesses.
6. CAIRP's values include being committed to professionalism, trustworthiness and objectivity.

AAIRP

7. AAIRP is Alberta's regional Association of Insolvency Professionals representing trustees in bankruptcy, receivers, agents, monitors and consultants in insolvency matters. AAIRP is associated with CAIRP. AAIRP has 87 general members. I am informed by an examination of the website of the Office of the Superintendent of Bankruptcy that there are currently 98 individual trustees registered to practice in Alberta.
8. The stated objectives of AAIRP are to work to:
 - (a) provide a level of self discipline so as to instil a high degree of public trust in dealing with an AAIRP member;
 - (b) provide opportunities for its members to stay current with the ever-changing insolvency and restructuring literature, regulations and debtor/creditor trends;
 - (c) foster the delivery of insolvency and restructuring services with integrity, objectivity and competence; and
 - (d) advocate for a fair, transparent and effective system for administrating insolvency and restructuring matters in Alberta and Canada.

9. AAIRP's stated mission statements are:
- (a) to act as a conduit between debtors and creditors so as to maintain an honest, an accountable and an effective system in dealing with restructuring and bankruptcy issues facing Albertans; and
 - (b) accomplishing this within the framework of the Office of the Superintendent of Bankruptcy, the Canadian Association of Insolvency and Restructuring Professionals and other insolvency and restructuring stakeholders.
10. I have reviewed the Application of Deloitte and Touche Inc. (the "Receiver"), filed by its counsel on January 14, 2011, and returnable January 24, 2011, for an Order to amend the Initial Order in these proceedings to allow the Receiver to file its updates to the Court through Reports and not through Affidavits. I believe a decision of this Court on the admissibility of evidence by receivers could impact the practice of the members of the Associations.
11. I make this Affidavit in support of the Application by the Associations to be granted intervenor status in the Application by Deloitte & Touche Inc. to amend the Initial Order in these proceedings.

SWORN BEFORE ME AT CALGARY, ALBERTA,)
THIS 20TH DAY OF JANUARY, 2010.)

Valerie Lock)

Commissioner for Oaths
in and for the Province of Alberta)

Valerie Lock, expiry July 27, 2011
Print Name and Expiry)

Bruce Alger

Signature

Bruce Alger

Print Name