



This is the 1st affidavit
of Christopher J. Ramsay in this case
and was made on 14 August / 2019

COURT NO. B121430
ESTATE NO. 11-1693965
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY AND INSOLVENCY

IN THE MATTER OF THE BANKRUPTCY OF
RASHIDA ABDULRASUL SAMJI

AFFIDAVIT

I, **CHRISTOPHER J. RAMSAY**, Barrister and Solicitor, of the 900 – 885 West Georgia Street, Vancouver, British Columbia, V6C 3H1, MAKE OATH AND SAY THAT:

1. I am a partner with the law firm of Clark Wilson LLP ("**CW**"), solicitors for Boale, Wood & Company Ltd., in its capacity as Trustee in Bankruptcy (the "**Trustee**") of Rashida Abdulrasul Samji ("**Ms. Samji**"), Rashida Samji, Notary Corporation ("**RSNC**") and Samji & Assoc. Holdings Inc. ("**SAHI**") (collectively, the "**Debtors**"), and as such I have personal knowledge of the facts and matters deposed to herein except where stated to be based upon information and belief, and where so stated I verily believe the same to be true.

BACKGROUND AND LENGTH OF ENGAGEMENT

2. On December 5, 2012, the Debtors were assigned into bankruptcy pursuant to section 49 of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3 (the "**BIA**") and the Trustee was appointed as the trustee of the Debtors' bankruptcy estate (the "**Estate**").

3. On June 26, 2013, this Court issued an order consolidating the actions against each of the Debtors and their respective estates into a single action under Court No. B121430. The Trustee was directed and authorized to administer the consolidated Estate of the Debtors.

4. In or around February 2013, Dentons Canada LLP ("**Dentons**") was retained by the Trustee to act as its counsel in connection with the Trustee's administration of the Estate.
5. At that time, I was a partner of Dentons and lead counsel to the Trustee in connection with this matter.
6. In or about February 2014, I left Dentons to continue my practice as a partner at CW.
7. On or about March 21, 2014, Ron Usher, Mathew Good, and John Green (the "**Inspectors**") of the Estate resolved to engage CW as the Trustee's counsel and, as of April 4, 2014, CW became the solicitor of record for the Trustee in place of Dentons pursuant to the Notice of Address for Service, filed April 3, 2014.
8. Paul Bennett replaced Mathew Good and has been acting as an Inspector since September 2014.
9. In or around March 2018, John Green stepped down as an Inspector and he was not replaced.
10. As of the date of this Affidavit, Paul Bennett and Ron Usher are the Inspectors of the Estate.
11. On April 14, 2016, Madam Justice Gerow granted an order approving the fees and disbursements of CW for services provided as counsel for the Trustee from March 20, 2014 to February 1, 2016, which was in the total amount of \$985,571.27 (the "**2016 Taxation**"). At the time of the application, Madam Justice Gerow was seized of these bankruptcy proceedings. As of the date of this Affidavit, her Ladyship is no longer seized of these proceedings.
12. I swear this Affidavit in support of CW's application for an order approving its fees and disbursements for services provided as counsel for the Trustee from February 2, 2016 to April 30, 2019.

BACKGROUND

13. The background of the administration of the Estate is set out in the Trustee's Preliminary Report filed on January 3, 2013, the Trustee's First Report to the Court filed March 13, 2015 and the Trustee's Second Report to the Court dated November 20, 2015 (collectively, the "**Reports**").

14. As set forth in the Reports:

- (a) Ms. Samji was a notary public of British Columbia;
- (b) The Debtors operated a scheme whereby Ms. Samji represented to over 200 investors (the "**Investors**") that they could make an investment by placing funds in her notary trust account that would then be used, without direct access, as collateral for loans in foreign countries where the Mark Anthony Group conducted its wine business (the "**Scheme**");
- (c) Ms. Samji represented that the Investors would receive interest-like annual returns of 12% and more;
- (d) Between 2003 and 2012, the Debtors received over \$100 million from the Investors;
- (e) Contrary to Ms. Samji's representations, the Scheme was not related in any way to the Mark Anthony Group and the Trustee found no indication that the Investors' funds (the "**Funds**") were used for investment. Instead, the Trustee understood that the Funds were initially deposited to accounts in the name of RSNC and then disbursed to SAHI, Ms. Samji and others;
- (f) A number of Investors commenced lawsuits (the "**Investor Actions**") against the Debtors, claiming that the Scheme was a Ponzi scheme that paid false "returns" to Investors from Funds placed in the Scheme by other Investors;
- (g) In or around January 2012, the British Columbia Securities Commission (the "**Securities Commission**") commenced an investigation of the Scheme, took possession of the Debtors' books and records, froze the Debtors' accounts and liened secured eight properties held (wholly or in part) by Ms. Samji and associated with the Scheme (the "**Lands**");

- (h) On February 8, 2012, the Society of Notaries of British Columbia (the “**Notaries’ Society**”) obtained an Order of this Court appointing a custodian over the assets of RSNC in order to manage Ms. Samji’s notarial practice;
- (i) On April 3, 2012, the Securities Commission obtained an Order of this Court appointing MNP (the “**Receiver**”) as the Receiver over funds held in the accounts of SAHI at the Toronto Dominion Bank and Vancouver City Savings and Credit Union;
- (j) On December 6, 2012, the Receiver made an unsuccessful application to expand its powers to include control over the other property of the Debtors so that the Receiver could continue its investigation of the Scheme and recover funds to be distributed to Investors in accordance with further Order. At the same time, the Receiver further sought, unsuccessfully, to stay the bankruptcy proceedings against the Debtors on the basis that the Trustee’s duties would be duplicative and unnecessary. The Receiver’s application was successfully opposed by the Trustee and others and was ultimately dismissed;
- (k) Subsequently, as part of its investigation of the Debtors, the Royal Canadian Mounted Police (the “**RCMP**”) seized books and records relating to the Scheme, including books and records previously seized by the Securities Commission; and
- (l) On March 2, 2012, a class action was commenced in the case of *Jer et al v Samji et al*, BCSC Vancouver Registry No. S-121627 against the Debtors, the financial institutions the Debtors operated through and the Notaries’ Society. Settlements have been reached in the class action proceedings.

15. In May 2016, Ms. Samji was convicted in the BC Provincial Court of theft and fraud on criminal charges in relation to the Scheme.

COMPLEXITY OF WORK PERFORMED

16. This engagement has, to date, dealt with a large-scale investment Scheme that involves hundreds of investors who invested, in the aggregate, approximately \$100 million over an approximate 10-year period.

17. The complexity of the Scheme made establishing the basic factual matrix extremely difficult. The following appears to be the characteristics of the Scheme:

- (a) when an Investor invested Funds, such Funds were deposited into a series of pooled accounts;
- (b) when Investors subsequently received disbursements from the Scheme, these disbursements, in some cases, came from the pooled account into which such Investor's Funds were deposited, but in some cases came from other pooled accounts;
- (c) disbursements were also paid out of pooled accounts to non-Investor third parties apparently on the direction of Investors;
- (d) in some cases, Investors' requests for disbursements of Funds to third parties were documented, but in other cases, no such documentation appeared to be available;
- (e) some Investors appeared to earn a certain rate of interest return on their Funds whereas other Investors appeared to earn interest returns in an inconsistent manner; and
- (f) some investors appeared to earn further returns as a form of "commission" for inducing new Investors under commission arrangements which were at least, in some cases honoured by the Debtors, though they may not have been privy to the details thereof.

18. As an end result of this partially documented, circuitous flow of Funds and disbursements, establishing ownership over the distributed and non-distributed Funds was a major logistical and legal challenge. Further, investigating whether certain Investors had made profits or losses in this complicated matrix while lacking substantial information was equally difficult.

19. In addition to the forensic challenges, the Trustee and its counsel have needed: to liquidate the Lands acquired with the Funds; participate in proceedings brought by certain Investors to group the Investor Actions under a class proceeding; and engage with the Securities Commission, the RCMP, and the custodian of the Debtors with regard to their investigation of the Scheme.

20. The forensic services of MNP Ltd. (the "**Forensic Accountant**") were retained by the Trustee to perform an analysis of all the financial documents gathered from various sources, including those documents seized by the Securities Commission and the RCMP. The investigation into each of the transactions made by Ms. Samji from her various accounts was and continues to be a laborious ongoing and complex process.

21. The complexity of the Scheme resulted in a number of legal alternatives available to the Trustee in regards to collecting Funds properly part of the Estate. As part of its services offered to date, CW has provided advice on multiple potential causes of action, many with different limitation periods, legal requirements, and probabilities of success.

22. In order to realize assets for the Estate, the Trustee took collection steps against those Investors who appeared to receive, directly and/or indirectly, more than they had invested in the Scheme (the "**Net Winners**"). Recovery efforts were complicated by the legal status of the Net Winners and other recipients of Funds, who were individuals, corporations, notaries, and charities, some of whom had unknown identities. Each type of Net Winner required different approaches to tracing and recovery of Funds.

23. Since the time of the 2016 Taxation, CW's efforts have been predominantly focused on pursuing recovery against the Net Winners. A number of actions against Net Winners have been commenced, resulting in some cases in lengthy investigations and settlement negotiations, and in others in extensive preparation for hearings and trial (including a trial, Summary Trial Applications, Examinations for Discovery and extensive document discovery and exchange).

24. To date, one action against a Net Winner has proceeded to trial, with the Trustee successfully obtaining judgment against the Net Winner in *Boale, Wood & Company Ltd. v. Whitmore*, 2017 BCSC 1917 [*Whitmore*], for the return to the Estate of the profits the Net Winner received from the Scheme. The decision of Mr. Justice G.C. Weatherill in *Whitmore* is the most comprehensive decision rendered by a Court in Canada to date, confirming a bankruptcy trustee's legal ability to recover funds received by Net Winners in a Ponzi scheme. The *Whitmore* decision has been advantageous to the Trustee as it has assisted with persuading other Net Winners into entering into provident settlements with the Estate.

25. In summary, the complexity of the proceedings required CW to advise the Trustee on a broad range of areas including insolvency, commercial litigation, real estate, privacy law, trusts and administrative law. CW utilized a core legal team of two insolvency lawyers and four civil litigators, while also drawing on the experience of other colleagues on discrete matters as they arose.

FILE ORGANIZATION

26. CW organized its billings into the following matters (the "CW Accounts") to aid the Trustee and the Inspectors of the Estate in understanding how counsels' time was allocated between various matters that pertained to the Trustee's administration of the Estate:

| Matter No. | Name of Matter | Billings for Legal Services Pertaining To: |
|-------------------|--|---|
| 41777-0001 | General Bankruptcy Administration | General bankruptcy administration of the Estate which affects all of the Debtors and is not otherwise captured by the matters below |
| 41777-0002 | Kay Brian Whitmore | Enforcement of claims relating to Funds received directly or indirectly by Kay Brian Whitmore |
| 41777-0003 | Pradeep Kumar Vohora and Ruth Vohora | Enforcement of claims relating to Funds received directly or indirectly by Pradeep Kumar Vohora and Ruth Vohora |
| 41777-0004 | Ingrid Thaker and Sohail Thaker | Enforcement of claims relating to Funds received by Ingrid Thaker and Sohail Thaker |
| 41777-0005 | Kusta (Gus) Teng | Enforcement of claims relating to Funds received directly or indirectly by Kusta (Gus) Teng |
| 41777-0006 | Jamileh Soorani and Shiva Ojaroodi | Enforcement of claims relating to Funds received directly or indirectly by Jamileh Soorani and Shiva Ojaroodi |
| 41777-0008 | Kamruddin (Kam) Shams | Enforcement of claims relating to Funds received directly or indirectly by Kamruddin (Kam) Shams |
| 41777-0009 | Bettina Schonberger | Enforcement of claims relating to Funds received directly or indirectly by Bettina Schonberger |
| 41777-0012 | Arvindbhai B. Patel | Enforcement of claims relating to Funds received directly or indirectly by Arvindbhai B. Patel |
| 41777-0013 | Paul Mayo and Gurbpaul Singh Mayo | Enforcement of claims relating to Funds received directly or indirectly by Paul Mayo and Gurbpaul Singh Mayo |
| 41777-0014 | Derek King | Enforcement of claims relating to Funds received directly or indirectly by Derek King |
| 41777-0016 | Mostafa Kiarostami and Omid Kiarostami | Enforcement of claims relating to Funds received directly or indirectly by Mostafa Kiarostami and Omid Kiarostami |

| Matter No. | Name of Matter | Billings for Legal Services Pertaining To: |
|-------------------|---|--|
| 41777-0017 | Aabid Keshvani, Adil Keshvani, Karim Keshvani and Zebeen Keshvani | Enforcement of claims relating to Funds received directly or indirectly by Aabid Keshvani, Adil Keshvani, Karim Keshvani and Zebeen Keshvani |
| 41777-0018 | Azim Kassam | Enforcement of claims relating to Funds received directly or indirectly by Azim Kassam |
| 41777-0019 | Gurdev Kainth, Parkas Kaur Kainth and Sukhminder Kainth | Enforcement of claims relating to Funds received directly or indirectly by Gurdev Kainth, Parkas Kaur Kainth and Sukhminder Kainth |
| 41777-0020 | Fayyaz Jeshani and Shabira Jeshani | Enforcement of claims relating to Funds received directly or indirectly by Fayyaz Jeshani and Shabira Jeshani |
| 41777-0021 | Mirza Jesani and Shahnaz Jesani | Enforcement of claims relating to Funds received directly or indirectly by Mirza Jesani and Shahnaz Jesani |
| 41777-0024 | Shenaz Dharamshi | Enforcement of claims relating to Funds received directly or indirectly by Shenaz Dharamshi |
| 41777-0026 | Charities | Claims against various charities receiving Funds |
| 41777-0027 | Al-Hashmi Bharwani | Enforcement of claims relating to Funds received directly or indirectly by Al-Hashmi Bharwani |
| 41777-0029 | Arbitrust AG | Enforcement of claims relating to Funds received directly or indirectly by Arbitrust AG |
| 41777-0030 | Mehboob Shivji and Nabadbanu Shivji | Enforcement of claims relating to Funds received directly or indirectly by Mehboob Shivji and Nabadbanu Shivji |
| 41777-0031 | Parminder Vickram, Cameron Vickram, Mohinder Singh Sandhu and Atul K. Mehra | Enforcement of claims relating to Funds received directly or indirectly by Parminder Vickram, Cameron Vickram, Mohinder Singh Sandhu and Atul K. Mehra |
| 41777-0032 | Sunil Sinha | Enforcement of claims relating to Funds received directly or indirectly by Sunil Sinha |
| 41777-0033 | Golnaz Ebrahim Babae and Mahnaz Ebrahim Babae | Enforcement of claims relating to Funds received directly or indirectly by Golnaz Ebrahim Babae and Mahnaz Ebrahim Babae |
| 41777-0034 | Lola Stockbrugger | Enforcement of claims relating to Funds received directly or indirectly by Lola Stockbrugger |

| Matter No. | Name of Matter | Billings for Legal Services Pertaining To: |
|-------------------|--|---|
| 41777-0035 | Nazlin Jinny Jiwa, Sayed Jiwa and Sunil Thaker | Enforcement of claims relating to Funds received directly or indirectly by Nazlin Jinny Jiwa, Sayed Jiwa and Sunil Thaker |
| 41777-0037 | Natasha Samji | Enforcement of claims relating to Funds received directly or indirectly by Natasha Samji |
| 41777-0038 | Rajesh Gajjar | Enforcement of claims relating to Funds received directly or indirectly by Rajesh Gajjar |
| 41777-0039 | Adil Keshvani | Enforcement of claims relating to Funds received directly or indirectly by Adil Keshvani |
| 41777-0040 | Faiyaz Keshvani | Enforcement of claims relating to Funds received directly or indirectly by Faiyaz Keshvani |
| 41777-0041 | Alnoor and Nazira Jesani | Enforcement of claims relating to Funds received directly or indirectly by Alnoor and Nazira Jesani |

FILE STAFFING

27. The size and complexity of this matter necessitated a team of insolvency litigation, civil/commercial litigation, labour and employment, and real estate lawyers at CW to advise and represent the Trustee. Where possible, the legal team utilized the support of articling students, paralegals, and legal assistants to perform work at a lower hourly rate.

28. To assist the Trustee with its initial administration of the Estates and for the benefit of creditors of the Estate, CW agreed to provide certain discounts to its standard billing rates.

29. From the outset, I, as lead counsel on this matter, agreed to a discount of my standard hourly rate, which was discounted up until January 2018. The discount was discontinued as at that point, the Estate was in the position to bear professional costs while CW was not in a position to continue to provide such discounts.

30. CW has discounted:

(a) my hourly rate as follow:

- (i) \$30 per hour from February 2016 to September 2016; and
- (ii) \$60 per hour from October 2016 to December 2017.

- (b) Articling Students rates by \$40 per hour until January 2018; and
- (c) photocopy and scanning charges from \$0.25 per page to \$0.15 per page until January 2018.

Insolvency Litigators

31. I am the Trustee's lead counsel at CW. I am a partner of CW and have specialized in the area of insolvency litigation since 1996.

32. My standard hourly rate from February 2, 2016 onwards has been between \$530 and \$600. However, my time was billed at a discounted rate of \$500 from February 2016 to December 2017. From January 2018 onwards, no discount was given and my time was billed at my standard hourly rate of \$600 per hour.

33. Katie Mak and I provided most of the insolvency services to the Trustee in this engagement.

34. Ms. Mak is an associate of CW and has specialized in the area of insolvency litigation since 2014.

35. Ms. Mak's standard hourly rate throughout this engagement was between \$300 and \$400.

Civil Litigators

36. In the period of February 2016 to November 2017, James Schmidt was a partner of CW. Mr. Schmidt has specialized in civil litigation since 1997.

37. Mr. Schmidt's hourly rate throughout this engagement was between \$545 and \$560.

38. Lucya Kowalewski was an associate at CW until becoming a partner in January 2019. Ms. Kowalewski has specialized in civil litigation since 2006.

39. Ms. Kowalewski's hourly rate throughout this engagement was between \$300 and \$395.

40. In the period of February 2016 to July 2018, Alexandra Andrisoi was an associate of CW. Ms. Andrisoi has specialized in civil litigation since 2015.

41. Ms. Andrisoi's hourly rate throughout this engagement was between \$240 and \$295.

42. Sean Tessarolo is an associate of CW and has specialized in civil litigation since 2016.

43. Mr. Tessarolo's hourly rate throughout this engagement was between \$260 and \$350.

Lawyers Billing Incidental Time

44. Several lawyers at CW provided some incidental assistance of ten hours or less each. Given the relatively small amounts of time billed by each of these lawyers, their experience is not set out above, and their time is not expressly broken out with the timekeepers set out below. However, the hours billed by each of those lawyers is reflected in the body of this Affidavit in Exhibits D, M, P, T, U, AA and BB (marked below).

Articling Students

45. The articling students' standard hourly rate throughout this engagement was between \$170 and \$215. However, articling student's time was billed at the discounted rate of \$130 until December 2017. From January 2018 onwards, the discount was discontinued as at that point, the Estate was in the position to bear these professional costs while CW was not in a position to continue to provide such discounts.

Paralegals

46. The paralegals who assisted the lawyers with this matter worked at hourly rates of \$100 to \$250.

Legal Assistants

47. The legal assistants who assisted the lawyers with this matter worked at hourly rates of \$80.

TOTAL AMOUNT BILLED TO THE TRUSTEE

48. The total amount of fees sought to be approved at this application is \$1,644,300.06, inclusive of the discounts described above provided by CW.

OUTCOME OF SERVICES RENDERED

49. As disclosed in the Reports, as at November 17, 2015, the sum of \$5,156,356.33 had been recovered for the Estate. I am further informed by the Trustee's office, that, to date, the total sum of \$7,287,284.53 has been recovered for the benefit of the Estate.

Attached hereto and marked as **Exhibit "A"** is a copy of an email dated July 31, 2019 enclosing an Interim Statement of Receipts and Disbursements, from the Trustee's office confirming the above. CW submits that the vast majority of these recoveries were obtained during CW's engagement as counsel for the Trustee.

50. During the period of February 2016 onwards, CW has continued to pursue recovery for the Estate on behalf of the Trustee, including continuing litigation proceedings against Net Winners for the return of their profits to the Estate. Through CW's efforts, many of these actions have settled and funds have been paid for the benefit of the Estate. There remains a few ongoing actions that CW continues to pursue.

51. In addition, CW has continued to assist the Trustee with its administration of the Estates, including attending to the resolution of disputed claims against the Estate and communications with creditors.

INSPECTOR APPROVAL OF COUNSEL FEES

52. John McEown, acting on behalf of the Trustee for the Estate, has advised that the Inspectors for the Estate have considered and approved all of CW's invoices to May 1, 2019. Attached hereto and marked as **Exhibit "B"** is a copy of an email dated July 22, 2019 from John McEown sent to Katie Mak confirming the above.

TRUSTEE CERTIFICATION OF COUNSEL FEES

53. The Trustee for the Estate has reviewed and certified all of CW's invoices to May 1, 2019, including a total of \$1,644,300.06 for the period of February 2, 2016 to May 1, 2019, as confirmed by the letter from Ms. Mak to the Trustee dated July 22, 2019, attached hereto and marked as **Exhibit "C"**. In particular, the Trustee has acknowledged the services have been duly authorized and duly rendered by CW and that the charges are reasonable in the opinion of the Trustee.

SERVICES RENDERED FOR 41777-0001 GENERAL BANKRUPTCY ADMINISTRATION

54. Attached hereto and marked as **Exhibit "D"** to this my Affidavit are copies of the following accounts (the "**General Bankruptcy Administration Accounts**") rendered by CW in connection with matter #41777-0001 (General Bankruptcy Administration) that cover legal services, disbursements and taxes from February 1, 2016 to April 30, 2019:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|-------------|---------------|------------|-------------|
| 1997162 | March 1, 2016 | \$5,312.00 | \$236.05 | \$648.13 | \$6,196.18 |
| 1998070 | April 1, 2016 | \$7,151.00 | \$186.02 | \$864.48 | \$8,201.50 |
| 1999868 | May 1, 2016 | \$25,300.00 | \$865.11 | \$3,077.83 | \$29,242.94 |
| 2002057 | June 1, 2016 | \$9,636.00 | \$375.27 | \$1,167.08 | \$11,178.35 |
| 2005735 | July 1, 2016 | \$13,932.00 | \$168.17 | \$1,680.25 | \$15,780.42 |
| 2007473 | August 1, 2016 | \$7,987.00 | \$164.50 | \$961.97 | \$9,113.47 |
| 2009687 | September 1, 2016 | \$982.50 | \$570.71 | \$146.45 | \$1,699.66 |
| 2012185 | October 1, 2016 | \$5,514.00 | \$88.46 | \$664.69 | \$6,267.15 |
| 2014349 | November 1, 2016 | \$10,315.50 | \$102.86 | \$1,243.53 | \$11,661.89 |
| 2017329 | December 1, 2016 | \$16,860.00 | \$416.52 | \$2,044.03 | \$19,320.55 |
| 2018519 | January 1, 2017 | \$6,150.50 | \$72.38 | \$741.18 | \$6,964.06 |
| 2021134 | February 1, 2017 | \$13,598.00 | \$1,551.30 | \$1,707.44 | \$16,856.74 |
| 2023330 | March 1, 2017 | \$7,813.00 | \$1,765.23 | \$1,021.82 | \$10,600.05 |
| 2024733 | April 1, 2017 | \$17,136.00 | \$114.07 | \$2,060.27 | \$19,310.34 |
| 2026983 | May 1, 2017 | \$2,694.00 | \$86.97 | \$327.63 | \$3,108.60 |
| 2030536 | June 1, 2017 | \$7,846.00 | \$42.42 | \$943.64 | \$8,832.06 |
| 2033152 | July 1, 2017 | \$3,954.00 | \$154.12 | \$478.19 | \$4,586.31 |
| 2034999 | August 1, 2017 | \$2,922.00 | \$62.88 | \$353.76 | \$3,338.64 |
| 2037068 | September 1, 2017 | \$6,418.00 | \$217.50 | \$776.56 | \$7,412.06 |
| 2038582 | October 1, 2017 | \$14,404.00 | \$240.18 | \$1,739.75 | \$16,383.93 |
| 2041277 | November 1, 2017 | \$8,001.00 | \$68.73 | \$936.56 | \$9,033.29 |
| 2043525 | December 1, 2017 | \$7,276.00 | \$26.37 | \$874.44 | \$8,176.81 |
| 2046279 | January 1, 2018 | \$180.00 | \$332.04 | \$25.09 | \$537.13 |
| 2049551 | February 1, 2018 | \$4,425.50 | \$841.45 | \$551.57 | \$5,818.52 |
| 2050759 | March 1, 2018 | \$3,665.50 | \$66.51 | \$443.20 | \$4,175.21 |
| 2052812 | April 1, 2018 | \$5,168.50 | \$126.60 | \$626.21 | \$5,921.31 |
| 2054922 | May 1, 2018 | \$2,964.00 | \$37.70 | \$357.57 | \$3,359.27 |
| 2058072 | June 1, 2018 | \$11,629.00 | \$103.07 | \$1,396.63 | \$13,128.70 |
| 2060098 | July 1, 2018 | \$4,655.50 | \$33.81 | \$560.11 | \$5,249.42 |
| 2062587 | August 1, 2018 | \$4,157.00 | \$32.76 | \$500.47 | \$4,690.23 |
| 2064325 | September 1, 2018 | \$722.50 | \$17.57 | \$87.59 | \$827.66 |
| 2066849 | October 1, 2018 | \$1,097.50 | \$7.80 | \$132.10 | \$1,237.40 |
| 2069095 | November 1, 2018 | \$7,257.00 | \$103.25 | \$875.65 | \$8,235.90 |
| 2073161 | December 1, 2018 | \$486.00 | \$132.10 | \$60.20 | \$678.30 |

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|------------------|------------|---------------|----------|---------------------|
| 2075456 | January 1, 2019 | \$4,512.00 | \$35.40 | \$543.21 | \$5,090.61 |
| 2077802 | February 1, 2019 | \$8,136.00 | \$119.70 | \$982.31 | \$9,238.01 |
| 2079784 | March 1, 2019 | \$1,464.00 | \$5.70 | \$175.97 | \$1,645.67 |
| 2082269 | April 1, 2019 | \$1,147.00 | \$13.10 | \$138.30 | \$1,298.40 |
| 2084845 | May 1, 2019 | \$2,120.00 | \$10.35 | \$254.92 | \$2,385.27 |
| TOTAL | | | | | \$306,782.01 |

55. The General Bankruptcy Administration Accounts are in the amount of \$287,124.05 and include the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|---------------------|--------|---------------|--|
| Christopher Ramsay | 48.30 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |
| Katie Mak | 223.70 | \$300-\$400 | no discount |
| Lucya Kowalewski | 74.70 | \$300-\$395 | no discount |
| James R. Schmidt | 100.10 | \$545-\$560 | no discount |
| Karen Ngan | 0.90 | \$285 | no discount |
| Alexandra Andrisoi | 129.30 | \$240-\$295 | no discount |
| Rachelle Mezzarobba | 1.20 | \$320-\$425 | no discount |
| Anna Sekunova | 0.30 | \$415 | no discount |
| Marion Allan | 8.60 | \$625 | no discount |
| Brendan Morley | 2.00 | \$370-395 | no discount |
| Sean Tessarolo | 45.70 | \$260-\$350 | no discount |
| Reid Brooks | 0.50 | \$350 | no discount |
| Articling Students | 55.40 | \$130-\$200 | \$130 until January 2018 No discount thereafter |
| Paralegals | 168.90 | \$100-\$250 | no discount |
| Legal Assistants | 18.20 | \$80 | no discount |

56. The services provided to the Trustee and outlined in the General Bankruptcy Administration Accounts included the following:

- (a) communicating and negotiating with certain Investors, or their counsel, with respect to the Funds received from the Scheme;

- (b) drafting demand letters to certain Net Winners and coordinating service and/or skip tracing services with respect to same;
- (c) assisting and working with the Trustee throughout the Claims Process in reviewing and responding to various claims filed by creditors;
- (d) working with the Trustee in preparing and drafting notices of disallowance of proof of claims filed by certain creditors pursuant to the BIA;
- (e) drafting materials and preparing for Chambers to respond to applications brought by certain creditors to set aside notices of disallowance issued by the Trustee;
- (f) drafting materials, preparing for and attending Chambers for multiple applications for substituted service orders with respect to various Investors;
- (g) drafting materials, preparing for and attending Chambers for applications to approve settlements with certain Investors;
- (h) drafting and issuing section 163 appointments to examine certain Investors pursuant to the BIA, and coordinating service and/or skip tracing services with respect to same;
- (i) drafting and issuing initial section 164 demands pursuant to the BIA, and coordinating service and/or skip tracing efforts with respect to same;
- (j) preparing memoranda of status of recovery efforts for the Trustee and Inspectors' review and consideration;
- (k) preparing and attending Inspectors' Meetings and advising the Trustee with regards to same;
- (l) working with and assisting the Trustee with drafting and preparation of multiple reports to the Court;
- (m) conducting legal research on witness fees pursuant to the BIA and the *BC Supreme Court Civil Rules*;
- (n) drafting materials, preparing for and attending Chambers for applications for interim distribution of funds from the Estate to the creditors;

- (o) coordinating service and/or skip tracing services with respect to foreign Investors;
- (p) coordinating receipt of settlement funds and transfer to trustee's account;
- (q) reviewing and considering impact of Samji's criminal decision on the Trustee's actions against Net Winners;
- (r) conducting and reviewing corporate searches with respect to certain Investors;
- (s) conducting legal research on the law on various issues in relation to proceedings by Trustee against Net Winners, including conspiracy, pure economic loss, and tort of deceit, forum conveniens, reliance on factual findings made at parallel legal proceedings, and joinder of claims,
- (t) attending to scheduling numerous trial dates for proceedings against Net Winners;
- (u) developing draft protocol for production of documents containing personal information of investors;
- (v) conducting legal research on protective orders to protect private and confidential information of Investors not party to court proceedings;
- (w) drafting and reviewing Notice of Application for order to compel List of Documents from Net Winner Ahluwalia;
- (x) conducting legal research regarding the distribution of monies from fraudulent funds and funds held in trust;
- (y) conducting legal research on law of contribution and drafting of legal memoranda regarding same;
- (z) conducting legal research on Canadian and US Ponzi schemes, including research and analysis of discoverability of fraud as it pertains to limitation periods, potential causes of action against Investors and third parties (including fraudulent preference, fraudulent conveyance and trust claims by creditors), potential defences, potential avenues of recovery and drafting of legal memoranda regarding same;

- (aa) conducting legal research with respect to conversion, monies had and received and constructive fraud, and drafting of legal memoranda regarding same;
- (bb) drafting legal opinions to Trustee regarding legal issues in relation to the disputes arising from the collection efforts with respect to certain Investors;
- (cc) conducting legal research on tracing remedy and trust claims in common law and equity;
- (dd) conducting legal research on presumptions of resulting trusts and advancement;
- (ee) conducting legal research on absolute discharge of bankrupts;
- (ff) conducting legal research on conspiracy, conspiracy claims and alter-ego trusts, and drafting of legal memoranda regarding same;
- (gg) preparing documentation and coordinating recovery efforts with collection agency with respect to certain Net Winners;
- (hh) conducting legal research on abuse of process;
- (ii) conducting legal research on application of *Fraudulent Preferences Act* s.34 and dual intent, relationship between trustees in bankruptcy and creditors, US case law for Ponzi-scheme presumption and valuable consideration, assignment of equitable causes of action, uncertainty of terms in contract formation;
- (ij) reviewing and considering Society of Notaries Public documents;
- (kk) conducting legal research on admissibility of financial institution records under the *BC Evidence Act* and prior convictions;
- (ll) reviewing settlement offers received from Net Winners and advising Trustee;
- (mm) considering and preparing terms of Order regarding production of documents from Net Winners;

- (nn) preparing and revising affidavit from TD Bank in relation to the Samji Group's bank accounts for the Trustee's litigation proceedings against various Net Winners;
- (oo) meetings with Trustee regarding testimony to be given at trial where Trustee was called as a witness;
- (pp) consider issues of claim against Net Winners for fraudulent conveyance of property and reviewing land title documents and communicating the Land Title Office regarding same;
- (qq) attending to Notices of Discontinuance of actions against Net Winners;
- (rr) reviewing limited partnership agreement between Samji and Balzac LP and considering Trustee's options with respect to same;
- (ss) reviewing land title searches and requesting correction from Land Title Office of title;
- (tt) considering the BC Securities Commission proceedings with respect to Patel and property held jointly with Kevin Patel; and
- (uu) preparing for application to pass the accounts of CW as the Trustee's counsel.

SERVICES RENDERED FOR 41777-0002 KAY BRIAN WHITMORE

57. Attached hereto and marked as **Exhibit "E"** to this my Affidavit are copies of the following accounts (the "**Whitmore Accounts**") rendered by CW in connection with matter #41777-0002 (Kay Brian Whitmore) that cover legal services, disbursements and taxes from February 6, 2016 to November 30, 2018:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|----------|---------------|---------|----------|
| 1997273 | March 1, 2016 | \$96.00 | \$117.16 | \$17.38 | \$230.54 |
| 1998081 | April 1, 2016 | \$236.50 | \$8.55 | \$28.82 | \$273.87 |
| 1999755 | May 1, 2016 | \$602.00 | \$16.71 | \$73.08 | \$691.79 |
| 2002054 | June 1, 2016 | \$377.00 | \$31.65 | \$46.82 | \$455.47 |
| 2005625 | July 1, 2016 | \$221.50 | \$173.10 | \$24.89 | \$419.49 |
| 2007198 | August 1, 2016 | \$312.50 | \$0.75 | \$37.55 | \$350.80 |
| 2009686 | September 1, 2016 | \$320.00 | \$2.55 | \$38.53 | \$361.08 |

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|-------------|---------------|-------------|---------------------|
| 2012183 | October 1, 2016 | \$3,772.00 | \$562.55 | \$480.77 | \$4,815.32 |
| 2014350 | November 1, 2016 | \$974.50 | \$6.70 | \$117.29 | \$1,098.49 |
| 2017321 | December 1, 2016 | \$1,020.50 | \$1,051.45 | \$174.10 | \$2,246.05 |
| 2018522 | January 1, 2017 | \$54.50 | \$0.75 | \$6.59 | \$61.84 |
| 2024762 | April 1, 2017 | \$168.00 | \$1.50 | \$20.24 | \$189.74 |
| 2026984 | May 1, 2017 | \$448.00 | \$0.90 | \$53.81 | \$502.71 |
| 2033154 | July 1, 2017 | \$5,880.00 | \$25.55 | \$706.88 | \$6,612.43 |
| 2035001 | August 1, 2017 | \$3,184.00 | \$47.90 | \$384.48 | \$3,616.38 |
| 2037075 | September 1, 2017 | \$12,165.00 | \$31.77 | \$1,461.39 | \$13,658.16 |
| 2039155 | October 1, 2017 | \$68,239.00 | \$378.42 | \$8,206.66 | \$76,824.08 |
| 2041205 | November 1, 2017 | \$91,330.00 | \$1,036.36 | \$11,011.47 | \$103,377.83 |
| 2043523 | December 1, 2017 | \$1,060.00 | \$5.25 | \$127.46 | \$1,192.71 |
| 2073160 | December 1, 2018 | \$76.00 | \$5.51 | \$9.40 | \$90.91 |
| TOTAL | | | | | \$217,069.69 |

58. The Whitmore Accounts are in the amount of \$217,069.69 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|--------|---------------|--|
| Christopher Ramsay | 2.10 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |
| Katie Mak | 13.70 | \$300-\$400 | no discount |
| James R. Schmidt | 149.00 | \$545-\$560 | no discount |
| Alexandra Andrisoi | 247.60 | \$240-\$295 | no discount |
| Sean Tessarolo | 92.80 | \$260-\$350 | no discount |
| Articling Students | 35.10 | \$130-\$200 | \$130 until January 2018 No discount thereafter |
| Paralegals | 3.00 | \$100-\$250 | no discount |
| Legal Assistants | 43.10 | \$80 | no discount |

59. The services provided to the Trustee and outlined in the Whitmore Accounts included the following:

- (a) drafting of demand letters to Kay Brian Whitmore ("**Whitmore**") with respect to the Funds received directly or indirectly by Whitmore (the "**Whitmore Funds**");
- (b) communicating and negotiating with Whitmore and/or counsel for Whitmore;
- (c) reviewing documentation regarding Whitmore available to the Trustee;
- (d) working with the Trustee and considering the analysis of the Forensic Accountant regarding the Whitmore Funds;
- (e) reviewing Response to Notice of Civil Claim filed by Whitmore and drafting of Reply;
- (f) preparing List of Documents, service letter and coordinating service of same;
- (g) drafting materials, preparing for and attending Examination for Discovery;
- (h) attending to request for Defendant's documents, availability for trial and examination of discovery;
- (i) preparing reporting letter to Trustee on Examination for Discovery;
- (j) communicating with the Forensic Accountant regarding amounts in dispute and interest calculations, preparing letter to Whitmore's counsel regarding amounts invested;
- (k) preparing Notice to Admit and corresponding letter and serving Notice to Admit on Whitmore's counsel;
- (l) performing land title search for Whitmore and obtaining property value information in BC and Ontario;
- (m) considering litigation strategy and scheduling of trial;
- (n) reviewing Examination for Discovery transcript of Whitmore;

- (o) preparing subpoena and corresponding letter, and arranging service of materials;
- (p) considering expert report requirements and meeting with potential experts to provide their opinion at trial;
- (q) drafting and reviewing documents and pleadings in support of Agreed Statement of Facts;
- (r) preparing letter to counsel regarding disclosure and use of confidential information;
- (s) communicating with counsel, preparing requisition, and scheduling Trial Management Conference;
- (t) preparing Trial Brief for Trial Management Conference and arranging service of same;
- (u) reviewing documents in preparation for witness interview, preparing witness statement, attending witness interview and preparing for Examination for Discovery;
- (v) outlining process for discovery of a person who is in jail;
- (w) preparing amended List of Documents and corresponding letter, serving materials to defence counsel;
- (x) considering potential additional witnesses to call at trial, correspondence with such additional witnesses;
- (y) communicating with various creditors regarding potential attendance at trial in support of Trustee's case, preparing summary of evidence of potential witnesses and witness list;
- (z) preparing memorandum summarizing next steps to be taken and issues to be considered in preparation for trial;
- (aa) conducting legal research on privilege and discovery questions, unjust enrichment in the context of a fraud and/or Ponzi , relevance of debt vs. investment distinction for the purposes of the unjust enrichment analysis, objectives for the criminal code, s.206(1)(e) and s.55 of the *Competition Act*, fraudulent conveyances, Ponzi scheme law, equitable remedies, good conscience defence, and double costs;

- (bb) conducting legal research on contractual illegality, application to unjust enrichment claim, role of public policy in finding contracts illegal, fraudulent conveyance, US case law regarding trustee in bankruptcy, unjust enrichment and net winners;
- (cc) reviewing with senior securities counsel regarding Whitmore transaction's violation of securities law;
- (dd) conducting legal research on *Fraudulent Conveyance Act* and defences raised by Whitmore;
- (ee) conducting legal research on UK equitable remedies, treatment of trustee claims to claw back net-winnings, and illegality cases;
- (ff) conducting legal research on total failure of consideration and unjust enrichment claims;
- (gg) reviewing minutes from Inspectors' meetings;
- (hh) preparing and revising document agreement;
- (ii) preparing written and oral submissions for trial;
- (jj) drafting materials, preparing for and attending trial;
- (kk) arranging for Trial Record and Trial Certificate to be filed with court registry;
- (ll) preparing Agreed Statement of Facts;
- (mm) considering settlement offer and communicating to various parties regarding offer;
- (nn) summarizing cases relied upon by opposing counsel;
- (oo) reviewing Reasons for Judgment;
- (pp) preparing Order Made After Trial; and
- (qq) preparing Bill of Costs, considering collection issues and application for double costs, and drafting corresponding letter to Whitmore's counsel.

SERVICES RENDERED FOR 41777-0003 PRADEEP KUMAR VOHORA AND RUTH VOHORA

60. Attached hereto and marked as **Exhibit "F"** to this my Affidavit are copies of the following accounts (the "**Vohora Accounts**") rendered by CW in connection with matter #41777-0003 (Pradeep Kumar Vohora and Ruth Vohora) which cover legal services, disbursements and taxes from January 14, 2016 to November 30, 2018:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|-------------|---------------|------------|---------------------|
| 1997159 | March 1, 2016 | \$1,950.00 | \$3.15 | \$234.16 | \$2,187.31 |
| 1998108 | April 1, 2016 | \$820.00 | \$1,417.00 | \$169.25 | \$2,406.25 |
| 1999812 | May 1, 2016 | \$0.00 | \$221.30 | \$1.07 | \$222.37 |
| 2002052 | June 1, 2016 | \$560.00 | \$284.35 | \$81.42 | \$925.77 |
| 2012180 | October 1, 2016 | \$110.00 | \$2.10 | \$13.31 | \$125.41 |
| 2014352 | November 1, 2016 | \$4,806.50 | \$449.35 | \$582.64 | \$5,838.49 |
| 2017317 | December 1, 2016 | \$2,845.00 | \$133.75 | \$342.89 | \$3,321.64 |
| 2018524 | January 1, 2017 | \$948.00 | \$22.80 | \$114.90 | \$1,085.70 |
| 2021142 | February 1, 2017 | \$2,269.00 | \$5.10 | \$272.54 | \$2,546.64 |
| 2024760 | April 1, 2017 | \$700.00 | \$225.70 | \$85.29 | \$1,010.99 |
| 2026985 | May 1, 2017 | \$1,136.00 | \$2.25 | \$136.45 | \$1,274.70 |
| 2030534 | June 1, 2017 | \$5,880.00 | \$22.35 | \$706.72 | \$6,609.07 |
| 2033155 | July 1, 2017 | \$862.00 | \$5.10 | \$103.71 | \$970.81 |
| 2034997 | August 1, 2017 | \$1,622.00 | \$133.80 | \$201.33 | \$1,957.13 |
| 2037072 | September 1, 2017 | \$4,490.00 | \$6.60 | \$539.13 | \$5,035.73 |
| 2038589 | October 1, 2017 | \$13,578.00 | \$126.15 | \$1,635.67 | \$15,339.82 |
| 2041273 | November 1, 2017 | \$5,448.00 | \$672.55 | \$687.39 | \$6,807.94 |
| 2043518 | December 1, 2017 | \$12,026.00 | \$172.26 | \$1,451.73 | \$13,649.99 |
| 2046258 | January 1, 2018 | \$19,178.00 | \$468.43 | \$2,320.78 | \$21,967.21 |
| 2049555 | February 1, 2018 | \$26,636.00 | \$323.73 | \$3,212.51 | \$30,172.24 |
| 2050706 | March 1, 2018 | \$35,510.50 | \$1,146.81 | \$4,311.06 | \$40,968.37 |
| 2052970 | April 1, 2018 | \$54.00 | \$154.38 | \$10.20 | \$218.58 |
| 2073159 | December 1, 2018 | \$0 | \$73.50 | \$3.68 | \$77.18 |
| TOTAL | | | | | \$164,719.34 |

61. The Vohora Accounts are in the amount of \$164,719.34 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|--------|---------------|--|
| Christopher Ramsay | 126.60 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |
| Katie Mak | 100.80 | \$300-\$400 | no discount |
| James R. Schmidt | 12.60 | \$545-\$560 | no discount |
| Alexandra Andrisoi | 63.00 | \$240-\$295 | no discount |
| Articling Students | 9.90 | \$130-\$200 | \$130 until January 2018 No discount thereafter |
| Paralegals | 111.60 | \$100-\$250 | no discount |
| Legal Assistants | 18.70 | \$80 | no discount |

62. The services provided to the Trustee and outlined in the Vohora Accounts included the following:

- (a) communicating and negotiating with counsel for Pradeep Kumar Vohora and Ruth Vohora (the "**Vohoras**");
- (b) reviewing documentation regarding the Vohoras available to the Trustee;
- (c) working with the Trustee and considering the analysis of the Forensic Accountant regarding the Funds received directly or indirectly by the Vohoras (the "**Vohora Funds**");
- (d) working with the Forensic Accountant Ltd. in reviewing and analyzing the documents relating to the transfers made to and from the Debtors' accounts with respect to the Vohora Funds;
- (e) preparing Notice of Civil Claim, Amended Notice of Civil Claim, and corresponding letter;
- (f) reviewing Response to Civil Claim and allegations contained within;
- (g) coordinating skip tracing services;

- (h) drafting letter regarding Default Judgment and Response to Notice of Civil Claim;
- (i) reviewing materials, preparing for and attending trial;
- (j) arranging trial date;
- (k) preparing Notice of Trial;
- (l) performing Land Title Office searches on all defendants;
- (m) preparing Notice of Application to add defendants and amend claim;
- (n) preparing Appointment to Examine for Discovery of Vohora, corresponding letter and service of same;
- (o) drafting materials, preparing and attending Examination for Discovery;
- (p) preparing List of Documents;
- (q) preparing and reviewing Agreed Statement of Facts;
- (r) reviewing and considering transcripts from Examination for Discoveries;
- (s) reviewing and considering documents requested from Examinations for Discoveries;
- (t) preparing letter of instruction to the Forensic Accountant;
- (u) preparing Notice to Admit and corresponding service letter, and arranging service of same;
- (v) preparing and attending Inspectors' Meetings with the Trustee and advising the Trustee with regards to same;
- (w) preparing Trial Brief;
- (x) conducting legal research on disclosure obligations and admissibility of expert reports and drafting research memorandum;
- (y) reviewing materials, preparing for and attending mediation;
- (z) preparing and revising Documents Agreement;

- (aa) preparing Trial Certificate and Trial Record;
- (bb) considering settlement offer;
- (cc) preparing formal offer to settle; and
- (dd) preparing Requisition and Consent Dismissal Order for filing and corresponding letter to counsel regarding release and undertakings.

SERVICES RENDERED FOR 41777-0004 INGRID THAKER AND SOHAIL THAKER

63. Attached hereto and marked as **Exhibit "G"** to this my Affidavit are copies of the following accounts (the "**Thaker Accounts**") rendered by CW in connection with matter #41777-0004 (Ingrid Thaker and Sohail Thaker) which cover legal services, disbursements and taxes from February 3, 2016 to July 12, 2016:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|----------------|------------|---------------|----------|-------------------|
| 1997258 | March 1, 2016 | \$240.00 | \$0.60 | \$28.83 | \$269.43 |
| 1998109 | April 1, 2016 | \$150.00 | \$3.75 | \$18.19 | \$171.94 |
| 1999818 | May 1, 2016 | \$1,200.00 | \$0.45 | \$144.02 | \$1,344.47 |
| 2002051 | June 1, 2016 | \$120.00 | \$23.25 | \$15.56 | \$158.81 |
| 2005627 | July 1, 2016 | \$60.00 | \$1.95 | \$7.30 | \$69.25 |
| 2007200 | August 1, 2016 | \$230.00 | \$4.82 | \$27.84 | \$262.66 |
| TOTAL | | | | | \$2,276.56 |

64. The Thaker Accounts are in the amount of \$2,276.56 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|-------------|-------|---------------|--------------------------|
| Katie Mak | 5.60 | \$300-\$400 | no discount |
| Paralegals | 3.20 | \$100-\$250 | no discount |

65. The services provided to the Trustee and outlined in the Thaker Accounts included the following:

- (a) communicating and negotiating with counsel for Ingrid Thaker and Sohail Thaker (the "**Thakers**");
- (b) reviewing documentation regarding the Thakers available to the Trustee;

- (c) drafting settlement agreement and release, and considering counsel's comments to same;
- (d) coordinating the deposit of settlement funds ;
- (e) drafting letter to counsel for Thakers regarding release and undertakings; and
- (f) preparing Consent Dismissal Order and Requisition.

SERVICES RENDERED FOR 41777-0005 KUSTA (GUS) TENG

66. Attached hereto and marked as **Exhibit "H"** to this my Affidavit are copies of the following accounts (the "**Teng Accounts**") rendered by CW in connection with matter #41777-0005 (Kusta (Gus) Teng) which cover legal services, disbursements and taxes from January 26, 2016 to September 19, 2016:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-----------------|----------|---------------|---------|-----------------|
| 1998110 | April 1, 2016 | \$124.00 | \$7.95 | \$15.28 | \$147.23 |
| 2002050 | June 1, 2016 | \$198.00 | \$5.11 | \$24.02 | \$227.13 |
| 2012178 | October 1, 2016 | \$198.00 | \$92.10 | \$24.02 | \$314.12 |
| TOTAL | | | | | \$688.48 |

67. The Teng Accounts are in the amount of \$688.48 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--------------------------|
| Alexandra Andrisoi | 1.00 | \$240-\$295 | no discount |
| Paralegals | 2.20 | \$100-\$250 | no discount |
| Legal Assistants | 0.50 | \$80 | no discount |

68. The services provided to the Trustee and outlined in the Teng Accounts included the following:

- (a) communicating and negotiating with Kusta (Gus) Teng ("**Teng**");
- (b) reviewing documentation regarding Teng available to the Trustee;
- (c) arranging deposit of settlement funds received;

- (d) preparing Consent Dismissal Order and Requisition, filing materials, and emailing to Trustee regarding same ; and
- (e) preparing letter to opposing counsel enclosing release and confirming payment of settlement funds.

SERVICES RENDERED FOR 41777-0006 JAMILEH SOORANI AND SHIVA OJAROODI

69. Attached hereto and marked as **Exhibit "I"** to this my Affidavit are copies of the following accounts (the "**Soorani/Ojaroodi Accounts**") rendered by CW in connection with matter #41777-0006 (Jamileh Soorani and Shiva Ojaroodi) which cover legal services, disbursements and taxes from August 25, 2016 to June 2, 2017:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|------------------|----------|---------------|---------|-------------------|
| 2017282 | December 1, 2016 | \$726.00 | \$245.05 | \$89.37 | \$1,060.42 |
| 2018528 | January 1, 2017 | \$8.00 | \$550.00 | \$28.46 | \$586.46 |
| 2023329 | March 1, 2017 | \$130.00 | \$181.50 | \$24.68 | \$336.18 |
| 2030533 | June 1, 2017 | \$72.00 | \$0.45 | \$8.66 | \$81.11 |
| 2033156 | July 1, 2017 | \$80.00 | \$16.85 | \$10.44 | \$107.29 |
| TOTAL | | | | | \$2,171.46 |

70. The Soorani/Ojaroodi Accounts are in the amount of \$2,171.46 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--------------------------|
| James R. Schmidt | 0.90 | \$545-\$560 | no discount |
| Katie Mak | 0.30 | \$300-\$400 | no discount |
| Alexandra Andrisoi | 2.00 | \$240-\$295 | no discount |
| Paralegals | 0.20 | \$100-\$250 | no discount |
| Legal Assistants | 2.00 | \$80 | no discount |

71. The services provided to the Trustee and outlined in the Soorani/Ojaroodi Accounts included the following:

- (a) communicating and negotiating with Jamileh Soorani and Shiva Ojaroodi ("**Soorani/Ojaroodi**");

- (b) reviewing documentation regarding Soorani/Ojaroodi available to the Trustee;
- (c) performing land title searches;
- (d) coordinating service and skip tracing services;
- (e) drafting and filing Notice of Civil Claim; and
- (f) drafting and filing Notice of Discontinuance.

SERVICES RENDERED FOR 41777-0008 KAMRUDDIN (KAM) SHAMS

72. Attached hereto and marked as **Exhibit "J"** to this my Affidavit are copies of the following accounts (the "**Shams Accounts**") rendered by CW in connection with matter #41777-0008 (Kamruddin (Kam) Shams) which cover legal services, disbursements and taxes from May 30, 2016 to August 22, 2016:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-----------------|----------|---------------|---------|-----------------|
| 2002048 | June 1, 2016 | \$120.00 | \$4.65 | \$14.63 | \$139.28 |
| 2012175 | October 1, 2016 | \$120.00 | \$9.87 | \$14.89 | \$144.76 |
| TOTAL | | | | | \$284.04 |

73. The Shams Accounts are in the amount of \$284.04 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|-------------|-------|---------------|--------------------------|
| Katie Mak | 0.60 | \$300-\$400 | no discount |
| Paralegals | 0.60 | \$100-\$250 | no discount |

74. The services provided to the Trustee and outlined in the Shams Accounts included the following:

- (a) communicating and negotiating with Kamruddin (Kam) Shams ("**Shams**");
- (b) reviewing documentation regarding Shams available to the Trustee;
- (c) working with the Trustee in analyzing documents received from Shams with respect to additional Funds invested by Shams into the Scheme;

- (d) considering settlement offer; and
- (e) drafting release for Shams and letter to Shams enclosing settlement agreement and release.

SERVICES RENDERED FOR 41777-0009 BETTINA SCHONBERGER

75. Attached hereto and marked as **Exhibit "K"** to this my Affidavit are copies of the following accounts (the "**Schonberger Accounts**") rendered by CW in connection with matter #41777-0009 (Bettina Schonberger) which cover legal services, disbursements and taxes from January 5, 2016 to April 20, 2016:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|---------------|----------|---------------|---------|-----------------|
| 1998113 | April 1, 2016 | \$120.00 | \$2.70 | \$14.54 | \$137.24 |
| 2002047 | June 1, 2016 | \$190.00 | \$0.45 | \$22.82 | \$213.27 |
| TOTAL | | | | | \$350.51 |

76. The Schonberger Accounts are in the amount of \$350.51 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|-------------|-------|---------------|--------------------------|
| Katie Mak | 0.80 | \$300-\$400 | no discount |
| Paralegals | 0.70 | \$100-\$250 | no discount |

77. The services provided to the Trustee and outlined in the Schonberger Accounts included the following:

- (a) communicating and negotiating with counsel for Bettina Schonberger ("**Schonberger**");
- (b) reviewing documentation regarding Schonberger available to the Trustee; and
- (c) reviewing and finalizing terms of settlement agreement.

SERVICES RENDERED FOR 41777-0012 ARVINDBHAI B. PATEL

78. Attached hereto and marked as **Exhibit "L"** to this my Affidavit are copies of the following accounts (the "**Patel Accounts**") rendered by CW in connection with matter

#41777-0012 (Arvindbhai B. Patel) which cover legal services, disbursements and taxes from May 3, 2016 to October 31, 2017:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|------------|---------------|------------|--------------------|
| 2002043 | June 1, 2016 | \$8,250.00 | \$339.36 | \$1,000.45 | \$9,589.81 |
| 2009685 | September 1, 2016 | \$420.00 | \$491.50 | \$74.51 | \$986.01 |
| 2014356 | November 1, 2016 | \$420.00 | \$1.50 | \$50.48 | \$471.98 |
| 2018532 | January 1, 2017 | \$60.00 | \$0.90 | \$7.25 | \$68.15 |
| 2023327 | March 1, 2017 | \$1,050.00 | \$6.60 | \$126.33 | \$1,182.93 |
| 2024759 | April 1, 2017 | \$980.00 | \$2.85 | \$117.74 | \$1,100.59 |
| 2033157 | July 1, 2017 | \$60.00 | \$0.00 | \$7.20 | \$67.20 |
| 2043515 | December 1, 2017 | \$60.00 | \$1.50 | \$7.28 | \$68.78 |
| TOTAL | | | | | \$13,535.45 |

79. The Patel Accounts are in the amount of \$13,535.45 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|-------------|-------|---------------|--------------------------|
| Katie Mak | 36.00 | \$300-\$400 | no discount |
| Paralegals | 5.00 | \$100-\$250 | no discount |

80. The services provided to the Trustee and outlined in the Patel Accounts included the following:

- (a) communicating and negotiating with Arvindbhai (Arvin) Patel ("**Patel**");
- (b) reviewing documentation regarding Patel and his son, Kevin Patel, available to the Trustee;
- (c) working with the Trustee in analyzing documents received from Patel with respect to additional Funds invested by Patel into the Scheme;
- (d) drafting and issuing section 163 appointments to examine certain investors pursuant to the BIA, and coordinating service and/or skip tracing services with respect to same;

- (e) drafting materials, preparing for and attending s.163 examination of Kevin Patel;
- (f) conducting and reviewing Land Title Searches on Patel and Kevin Patel;
- (g) considering analysis of the Forensic Accountant with respect to amounts paid to Kevin Patel;
- (h) reviewing s.163 examination transcripts of Kevin Patel and requesting further documents;
- (i) arranging criminal and bankruptcy searches on Patel; and
- (j) communicating with Coast Capital regarding Patel and Kevin Patel's bank statements.

SERVICES RENDERED FOR 41777-0013 PAUL MAYO AND GURPAUL SINGH MAYO

81. Attached hereto and marked as **Exhibit "M"** to this my Affidavit are copies of the following accounts (the "**Mayo Accounts**") rendered by CW in connection with matter #41777-0013 (Paul Mayo and Gurpaul Singh Mayo) which cover legal services, disbursements and taxes from February 4, 2016 to September 14, 2016:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|------------|---------------|----------|-------------------|
| 1997260 | March 1, 2016 | \$3,101.00 | \$53.93 | \$376.57 | \$3,531.50 |
| 1998115 | April 1, 2016 | \$150.00 | \$19.95 | \$19.00 | \$188.95 |
| 1999819 | May 1, 2016 | \$843.00 | \$68.16 | \$102.68 | \$1,013.84 |
| 2002041 | June 1, 2016 | \$419.00 | \$0.60 | \$50.31 | \$469.91 |
| 2005626 | July 1, 2016 | \$474.50 | \$12.90 | \$57.60 | \$545.00 |
| 2009684 | September 1, 2016 | \$538.50 | \$124.08 | \$66.57 | \$729.15 |
| 2012173 | October 1, 2016 | \$625.00 | \$182.27 | \$76.83 | \$884.10 |
| TOTAL | | | | | \$7,362.45 |

82. The Mayo Accounts are in the amount of \$7,362.45 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|---------------------|-------|---------------|--|
| Christopher Ramsay | 1.80 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |
| Katie Mak | 5.20 | \$300-\$400 | no discount |
| Rachelle Mezzarobba | 3.40 | \$320-\$425 | no discount |
| James R. Schmidt | 3.20 | \$545-\$560 | no discount |
| Alexandra Andrisoi | 1.30 | \$240-\$295 | no discount |
| Paralegals | 5.20 | \$100-\$250 | no discount |

83. The services provided to the Trustee and outlined in the Mayo Accounts included the following:

- (a) communicating and negotiating with counsel for Paul Mayo and Gurpaul Singh Mayo (the "**Mayos**");
- (b) reviewing documentation regarding the Mayos available to the Trustee;
- (c) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by the Mayos (the "**Mayo Funds**");
- (d) reviewing, analyzing and communicating with counsel regarding terms of settlement agreement;
- (e) reviewing purchase agreement for sale of Mayos' property and preparing letter to Land Title Office authorizing registration of release of CPL;
- (f) reviewing and preparing Consent to Judgment;
- (g) analyzing and reviewing terms of Mayos settlement agreement;
- (h) performing Land Title Office, bankruptcy and court records searches;

- (i) preparing and filing Requisition, Consent Dismissal Order and documents relating to the removal of CPLs; and
- (j) reviewing notice from Land Title Office regarding cancellation of CPL and preparing letter to LTO regarding release of CPL.

SERVICES RENDERED FOR 41777-0014 DEREK KING

84. Attached hereto and marked as **Exhibit "N"** to this my Affidavit are copies of the following accounts (the "**King Accounts**") rendered by CW in connection with matter #41777-0014 (Derek King) which cover legal services, disbursements and taxes from February 1, 2016 to April 30, 2019:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|-------------|---------------|------------|-------------|
| 1997265 | March 1, 2016 | \$709.50 | \$0.75 | \$85.19 | \$795.44 |
| 1998118 | April 1, 2016 | \$15,061.00 | \$16.95 | \$1,808.17 | \$16,886.12 |
| 1999822 | May 1, 2016 | \$161.00 | \$3,215.46 | \$180.09 | \$3,556.55 |
| 2002037 | June 1, 2016 | \$2,304.50 | \$1,929.86 | \$373.05 | \$4,607.41 |
| 2005728 | July 1, 2016 | \$2,504.00 | \$113.20 | \$306.14 | \$2,923.34 |
| 2007501 | August 1, 2016 | \$9,617.00 | \$8,419.18 | \$1,547.36 | \$19,583.54 |
| 2009681 | September 1, 2016 | \$7,494.50 | \$63.09 | \$902.50 | \$8,460.09 |
| 2012280 | October 1, 2016 | \$20,544.00 | \$270.00 | \$2,474.78 | \$23,288.78 |
| 2014357 | November 1, 2016 | \$1,037.00 | \$115.52 | \$130.22 | \$1,282.74 |
| 2017281 | December 1, 2016 | \$312.50 | \$2.40 | \$37.63 | \$352.53 |
| 2018533 | January 1, 2017 | \$817.50 | \$1.50 | \$98.19 | \$917.19 |
| 2021159 | February 1, 2017 | \$4,113.00 | \$10.80 | \$494.10 | \$4,617.90 |
| 2023325 | March 1, 2017 | \$4,510.50 | \$1.65 | \$541.35 | \$5,053.50 |
| 2024758 | April 1, 2017 | \$1,372.00 | \$7.95 | \$165.04 | \$1,544.99 |
| 2026986 | May 1, 2017 | \$1,708.00 | \$37.80 | \$206.85 | \$1,952.65 |
| 2038591 | October 1, 2017 | \$224.00 | (\$15.65) | \$26.10 | \$234.45 |
| 2050757 | March 1, 2018 | \$590.00 | \$13.35 | \$71.47 | \$674.82 |
| 2052974 | April 1, 2018 | \$209.00 | \$2.85 | \$25.22 | \$237.07 |
| 2060104 | July 1, 2018 | \$925.00 | \$22.55 | \$112.13 | \$1,059.68 |
| 2062583 | August 1, 2018 | \$916.00 | \$0.90 | \$109.97 | \$1,026.87 |
| 2064322 | September 1, 2018 | \$438.00 | \$273.35 | \$56.23 | \$767.58 |
| 2069088 | November 1, 2018 | \$2,062.00 | \$1.95 | \$247.54 | \$2,311.49 |
| 2073157 | December 1, 2018 | \$4,355.00 | \$7.35 | \$522.97 | \$4,885.32 |
| 2075454 | January 1, 2019 | \$222.00 | \$2,405.28 | \$134.05 | \$2,761.33 |
| 2077872 | February 1, 2019 | \$2,324.00 | \$36.00 | \$280.68 | \$2,640.68 |

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|---------------|------------|---------------|----------|---------------------|
| 2079790 | March 1, 2019 | \$7,200.00 | \$843.94 | \$892.07 | \$8,936.01 |
| 2082268 | April 1, 2019 | \$869.00 | \$2,065.96 | \$207.58 | \$3,142.54 |
| 2084842 | May 1, 2019 | \$197.50 | \$21.95 | \$24.81 | \$244.26 |
| TOTAL | | | | | \$124,744.87 |

85. The King Accounts are in the amount of \$107,020.05 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| Christopher Ramsay | 0.90 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |
| Katie Mak | 6.60 | \$300-\$400 | no discount |
| James R. Schmidt | 89.50 | \$545-\$560 | no discount |
| Lucya Kowalewski | 43.00 | \$300-\$395 | no discount |
| Alexandra Andrisoi | 68.70 | \$240-\$295 | no discount |
| Articling Students | 42.30 | \$130-\$200 | \$130 until January 2018 No discount thereafter |
| Paralegals | 47.60 | \$100-\$250 | no discount |
| Legal Assistants | 10.00 | \$80 | no discount |

86. The services provided to the Trustee and outlined in the King Accounts included the following:

- (a) communicating and negotiating with counsel for Derek King ("**King**");
- (b) reviewing documentation regarding King available to the Trustee;
- (c) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by King (the "**King Funds**");
- (d) working with the Forensic Accountant in reviewing and analyzing the documents relating to the transfers made to and from the Debtors' accounts with respect to the King Funds;

- (e) reviewing pleadings and listed documents for Examination for Discovery and preparing materials for numerous Examinations for Discovery;
- (f) traveling to Toronto and conducting Examination for Discovery and preparing reporting letter to Trustee;
- (g) considering and analyzing registration of certificate of pending litigation against title to property owned by King;
- (h) preparing letter requesting documents requested at Examination for Discovery;
- (i) preparing subpoena for service and letter to Ms. Samji for attendance at trial;
- (j) coordinating and scheduling Trial Management Conference and trial;
- (k) reviewing and preparing Agreed Statement of Facts;
- (l) coordinating and reviewing expert report from the Forensic Accountant;
- (m) communicating with Trustee to discuss litigation strategy in advance of trial;
- (n) reviewing and preparing draft settlement offer;
- (o) communicating with various parties regarding production of documents and preparing letter requesting document production;
- (p) reviewing and preparing Agreed Statement of Facts;
- (q) reviewing and analyzing of transcript of discovery of King and pleadings filed;
- (r) reviewing and preparing Notice to Admit;
- (s) conducting legal research on reliance of expert evidence and redaction of records;
- (t) reviewing and preparing confidentiality agreement;
- (u) preparing materials for and attendance at Trial Management Conference;
- (v) reviewing and preparing adjournment application;

- (w) reviewing and analyzing transcript of Securities Commission interview with Ms. Samji;
- (x) considering case strategy;
- (y) reviewing and protecting documents for production to opposing counsel;
- (z) reviewing and preparing Notice of Application seeking protection over documents disclosed in litigation containing third party information;
- (aa) reviewing and preparing Intention to Proceed and corresponding letter;
- (bb) attending to scheduling trial date;
- (cc) reviewing, preparing materials and attending mediation; and
- (dd) conducting and reviewing property searches; and
- (ee) negotiating and finalizing settlement agreement.

SERVICES RENDERED FOR 41777-0016 MOSTAFA KIAROSTAMI AND OMID KIAROSTAMI

87. Attached hereto and marked as **Exhibit "O"** to this my Affidavit is a copy of Invoice #2002036 (the "**Kiarostami Account**") rendered by CW in connection with matter #41777-0016 (Mostafa Kiarostami and Omid Kiarostami) which covers disbursements and taxes from May 1, 2016 to May 30, 2016.

88. The Kiarostami Account is in the amount of \$34.23.

89. The Kiarostami Account includes disbursements only. There were no legal fees charged on the Kiarostami Account during the above referenced time period.

SERVICES RENDERED FOR 41777-0017 AADIB KESHVANI, ADIL KESHVANI, KARIM KESHVANI AND ZABEEN KESHVANI

90. Attached hereto and marked as **Exhibit "P"** to this my Affidavit are copies of the following accounts (the "**Keshvani Accounts**") rendered by CW in connection with matter #41777-0017 (Aadib Keshvani, Adil Keshvani, Karim Keshvani and Zabeen Keshvani) which cover legal services, disbursements and taxes from February 2, 2016 to November 27, 2018:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|-------------|---------------|------------|---------------------|
| 1997266 | March 1, 2016 | \$1,609.50 | \$1.65 | \$193.23 | \$1,804.38 |
| 1998120 | April 1, 2016 | \$182.00 | \$7.50 | \$22.22 | \$211.72 |
| 1999823 | May 1, 2016 | \$1,211.00 | \$1,847.15 | \$237.68 | \$3,295.83 |
| 2001905 | June 1, 2016 | \$6,931.00 | \$841.25 | \$866.48 | \$8,638.73 |
| 2005628 | July 1, 2016 | \$1,999.50 | \$23.55 | \$241.13 | \$2,264.18 |
| 2007202 | August 1, 2016 | \$1,327.50 | \$678.75 | \$163.25 | \$2,169.50 |
| 2009679 | September 1, 2016 | \$1,311.00 | \$1,085.90 | \$211.62 | \$2,608.52 |
| 2012144 | October 1, 2016 | \$1,195.50 | \$128.65 | \$149.90 | \$1,474.05 |
| 2014330 | November 1, 2016 | \$5,990.00 | \$227.38 | \$730.26 | \$6,947.64 |
| 2017351 | December 1, 2016 | \$184.50 | \$160.60 | \$30.18 | \$375.28 |
| 2018566 | January 1, 2017 | \$102.50 | \$224.80 | \$13.55 | \$340.85 |
| 2023323 | March 1, 2017 | \$1,347.00 | (\$71.40) | \$158.07 | \$1,433.67 |
| 2025875 | April 1, 2017 | \$19,980.00 | \$317.87 | \$2,413.50 | \$22,711.37 |
| 2026988 | May 1, 2017 | \$972.00 | \$3,085.64 | \$270.93 | \$4,328.57 |
| 2030531 | June 1, 2017 | \$1,880.00 | \$2.25 | \$225.71 | \$2,107.96 |
| 2033158 | July 1, 2017 | \$292.00 | \$125.40 | \$41.31 | \$458.71 |
| 2034993 | August 1, 2017 | \$3,800.00 | \$162.15 | \$459.76 | \$4,421.91 |
| 2037071 | September 1, 2017 | \$5,700.00 | \$251.45 | \$696.59 | \$6,648.04 |
| 2038608 | October 1, 2017 | \$3,516.00 | \$117.00 | \$427.77 | \$4,060.77 |
| 2041270 | November 1, 2017 | \$3,764.00 | \$22.05 | \$452.78 | \$4,238.83 |
| 2043510 | December 1, 2017 | \$6,008.00 | \$178.84 | \$729.90 | \$6,916.74 |
| 2049594 | February 1, 2018 | \$5,946.00 | \$46.50 | \$715.85 | \$6,708.35 |
| 2052984 | April 1, 2018 | \$731.50 | \$225.00 | \$91.04 | \$1,047.54 |
| 2058086 | June 1, 2018 | \$443.50 | \$58.80 | \$56.17 | \$558.47 |
| 2060150 | July 1, 2018 | \$1,318.50 | \$2.85 | \$158.37 | \$1,479.72 |
| 2062645 | August 1, 2018 | \$3,213.00 | \$27.75 | \$386.95 | \$3,627.70 |
| 2064318 | September 1, 2018 | \$10,320.00 | \$56.90 | \$1,241.25 | \$11,618.15 |
| 2066847 | October 1, 2018 | \$11,020.00 | \$2,921.86 | \$1,464.68 | \$15,406.54 |
| 2069086 | November 1, 2018 | \$4,852.00 | \$11.40 | \$582.81 | \$5,446.21 |
| 2073156 | December 1, 2018 | \$1,158.00 | \$19.35 | \$139.93 | \$1,317.28 |
| TOTAL | | | | | \$134,667.21 |

91. The Keshvani Accounts are in the amount of \$134,667.21 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|--------|---------------|--|
| Christopher Ramsay | 21.30 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |
| Katie Mak | 45.30 | \$300-\$400 | no discount |
| James R. Schmidt | 59.20 | \$545-\$560 | no discount |
| Lucya Kowalewski | 3.20 | \$300-\$395 | no discount |
| Alexandra Andrisoi | 120.60 | \$240-\$295 | no discount |
| Brendan Morley | 1.00 | \$370-395 | no discount |
| Paralegals | 57.70 | \$100-\$250 | no discount |
| Legal Assistants | 46.00 | \$80 | no discount |

92. The services provided to the Trustee and outlined in the Keshvani Accounts included the following:

- (a) reviewing and analyzing documentation regarding Aadib Keshvani, Adil Keshvani, Karim Keshvani and Zabeen Keshvani (the "Keshvanis") available to the Trustee;
- (b) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by the Keshvanis (the "Keshvani Funds");
- (c) working with the Forensic Accountant in reviewing and analyzing the documents relating to the transfers made to and from the Debtors' accounts with respect to the Keshvani Funds;
- (d) arranging and preparing for examinations of the Keshvanis pursuant to section 163 of the BIA including travel to Calgary;
- (e) reviewing, analyzing and considering the transcripts of Examinations for Discovery;
- (f) reviewing and preparing Notice of Civil Claim and corresponding letter;

- (g) conducting and reviewing corporate searches of entities that received distributions from the Scheme;
- (h) conducting and reviewing property searches and considering CPL registration;
- (i) coordinating service and skip tracing services;
- (j) reviewing and preparing for Examinations for Discovery;
- (k) attending to scheduling trial date;
- (l) reviewing and considering bank accounts owned by Keshvanis further to information obtained at discoveries;
- (m) communicating with opposing counsel regarding production of discovery requests;
- (n) coordinate obtaining an expert report from the Forensic Accountant;
- (o) reviewing, preparing and filing Consent Order to have Karim/Zabin actions heard together;
- (p) reviewing, preparing materials and attending mediation; and
- (q) reviewing and preparing settlement agreement and release.

93. New matters were subsequently opened for the Trustee's claims against Adil Keshvani and Faiyaz Keshvani under matters #41777-39 and #41777-40, respectively.

SERVICES RENDERED FOR 41777-0018 AZIM KASSAM

94. Attached hereto and marked as **Exhibit "Q"** to this my Affidavit are copies of the following accounts (the "**Kassam Accounts**") rendered by CW in connection with matter #41777-0018 (Azim Kassam) which cover legal services, disbursements and taxes from October 18, 2016 to October 24, 2018:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|------------------|----------|---------------|---------|----------|
| 2014359 | November 1, 2016 | \$90.00 | \$144.00 | \$18.00 | \$252.00 |
| 2017346 | December 1, 2016 | \$0.00 | \$500.90 | \$25.05 | \$525.95 |
| 2021162 | February 1, 2017 | \$0.00 | \$300.99 | \$15.05 | \$316.04 |
| 2024757 | April 1, 2017 | \$580.00 | \$2.70 | \$69.74 | \$652.44 |

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|------------|---------------|----------|--------------------|
| 2026989 | May 1, 2017 | \$1,250.00 | \$262.67 | \$162.55 | \$1,675.22 |
| 2030530 | June 1, 2017 | \$780.00 | \$233.05 | \$103.65 | \$1,116.70 |
| 2033159 | July 1, 2017 | \$734.00 | \$0.90 | \$88.13 | \$823.03 |
| 2034990 | August 1, 2017 | \$1,168.00 | \$15.60 | \$140.94 | \$1,324.54 |
| 2037070 | September 1, 2017 | \$0.00 | \$223.90 | \$1.20 | \$225.10 |
| 2038697 | October 1, 2017 | \$354.00 | \$745.25 | \$79.74 | \$1,178.99 |
| 2043495 | December 1, 2017 | \$0.00 | \$103.45 | \$1.17 | \$104.62 |
| 2058083 | June 1, 2018 | \$1,127.00 | \$0.90 | \$135.29 | \$1,263.19 |
| 2060235 | July 1, 2018 | \$407.50 | \$2.85 | \$49.05 | \$459.40 |
| 2073155 | December 1, 2018 | \$118.00 | \$8.95 | \$14.26 | \$141.21 |
| TOTAL | | | | | \$10,058.43 |

95. The Kassam Accounts are in the amount of \$10,058.43 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|------------------|-------|---------------|--------------------------|
| Katie Mak | 12.90 | \$300-\$400 | no discount |
| James R. Schmidt | 1.40 | \$545-\$560 | no discount |
| Sean Tessarolo | 1.90 | \$260-\$350 | no discount |
| Paralegals | 9.10 | \$100-\$250 | no discount |
| Legal Assistants | 0.40 | \$80 | no discount |

96. The services provided to the Trustee and outlined in the Kassam Accounts included the following:

- (a) reviewing and preparing demand letter to Azim Kassam;
- (b) reviewing supporting documents and preparing Notice of Civil Claim;
- (c) conducting and reviewing corporate searches;
- (d) reviewing and considering transaction history and recipients;
- (e) preparing memorandum regarding issues with respect to commencing claims;

- (f) reviewing and preparing materials for Default Judgment against defendants;
- (g) reviewing and preparing requisition for Default Judgment;
- (h) reviewing and preparing documents to be included in List of Documents; and
- (i) reviewing and preparing Notice of Intention to Proceed.

SERVICES RENDERED FOR 41777-0019 GURDEV KAINTH, PARKASH KAUR KAINTH AND SUKHMINDER KAINTH

97. Attached hereto and marked as **Exhibit "R"** to this my Affidavit are copies of the following accounts (the "**Kainth Accounts**") rendered by CW in connection with matter #41777-0019 (Gurdev Kainth, Parkash Kaur Kainth and Sukhminder Kainth) which cover legal services, disbursements and taxes from May 27, 2016 to September 8, 2017:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|------------------|------------|---------------|----------|--------------------|
| 2001904 | June 1, 2016 | \$120.00 | \$2.10 | \$14.51 | \$136.61 |
| 2012143 | October 1, 2016 | \$270.00 | \$0.90 | \$32.45 | \$303.35 |
| 2014334 | November 1, 2016 | \$1,170.00 | \$98.10 | \$141.53 | \$1,409.63 |
| 2017343 | December 1, 2016 | \$719.50 | \$0.90 | \$86.40 | \$806.80 |
| 2018569 | January 1, 2017 | \$392.50 | \$218.25 | \$47.67 | \$658.42 |
| 2021164 | February 1, 2017 | \$510.00 | \$5.85 | \$61.49 | \$577.34 |
| 2023322 | March 1, 2017 | \$2,238.00 | \$258.30 | \$281.48 | \$2,777.78 |
| 2024754 | April 1, 2017 | \$2,154.00 | \$26.15 | \$259.79 | \$2,439.94 |
| 2026991 | May 1, 2017 | \$378.00 | \$1.20 | \$45.42 | \$424.62 |
| 2030529 | June 1, 2017 | \$382.00 | \$0.90 | \$45.89 | \$428.79 |
| 2033160 | July 1, 2017 | \$280.00 | \$2.55 | \$33.73 | \$316.28 |
| 2034989 | August 1, 2017 | \$1,140.00 | \$1.95 | \$136.90 | \$1,278.85 |
| 2038616 | October 1, 2017 | \$150.00 | \$110.80 | \$19.54 | \$280.34 |
| TOTAL | | | | | \$11,838.75 |

98. The Kainth Accounts are in the amount of \$11,838.75 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| Christopher Ramsay | 2.30 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |
| Katie Mak | 22.60 | \$300-\$400 | no discount |
| James R. Schmidt | 2.90 | \$545-\$560 | no discount |
| Paralegals | 3.80 | \$100-\$250 | no discount |

99. The services provided to the Trustee and outlined in the Kainth Accounts included the following:

- (a) communicating and negotiating with counsel for Gurdev Kainth, Parkash Kaur Kainth and Sukhminder Kainth (the "**Kainths**");
- (b) reviewing documentation regarding the Kainths available to the Trustee;
- (c) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by the Kainths (the "**Kainth Funds**");
- (d) reviewing and considering the documentation provided by counsel for the Kainths with respect to additional funds invested by the Kainths into the Scheme;
- (e) conducting and reviewing Land Title Office searches;
- (f) reviewing and preparing Notice of Civil Claim;
- (g) considering claim submitted in bankruptcy proceedings and relationship with civil proceedings against the Kainths;
- (h) reviewing and preparing settlement agreement and release; and
- (i) reviewing and preparing Requisition for filing Consent Orders.

SERVICES RENDERED FOR 41777-0020 FAYYAZ JESHANI AND SHABIRA JESHANI

100. Attached hereto and marked as **Exhibit "S"** to this my Affidavit are copies of the following accounts (the "**Jeshani Accounts**") rendered by CW in connection with matter #41777-0020 (Fayyaz Jeshani and Shabira Jeshani) which covers legal fees, disbursements and taxes from October 20, 2016 to April 30, 2019:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|----------|---------------|----------|-------------------|
| 2014360 | November 1, 2016 | \$310.00 | \$21.70 | \$38.31 | \$370.01 |
| 2018571 | January 1, 2017 | \$60.00 | \$0.90 | \$7.25 | \$68.15 |
| 2024753 | April 1, 2017 | \$320.00 | \$0.90 | \$38.45 | \$359.35 |
| 2030527 | June 1, 2017 | \$120.00 | \$1.50 | \$14.48 | \$135.98 |
| 2033161 | July 1, 2017 | \$60.00 | \$1.05 | \$7.25 | \$68.30 |
| 2034987 | August 1, 2017 | \$480.00 | \$17.90 | \$58.50 | \$556.40 |
| 2037069 | September 1, 2017 | \$916.00 | \$237.55 | \$111.80 | \$1,265.35 |
| 2038623 | October 1, 2017 | \$786.00 | \$265.00 | \$106.63 | \$1,157.63 |
| 2043486 | December 1, 2017 | \$60.00 | \$17.00 | \$8.05 | \$85.05 |
| 2058082 | June 1, 2018 | \$444.00 | \$0.90 | \$53.33 | \$498.23 |
| 2064316 | September 1, 2018 | \$789.00 | \$3.00 | \$94.83 | \$886.83 |
| 2066846 | October 1, 2018 | \$998.00 | \$1.05 | \$119.81 | \$1,118.86 |
| 2073154 | December 1, 2018 | \$59.00 | \$1.20 | \$7.14 | \$67.34 |
| 2084837 | May 1, 2019 | \$422.00 | \$6.75 | \$50.98 | \$479.73 |
| TOTAL | | | | | \$7,117.21 |

101. The Jeshani Accounts are in the amount of \$6,637.48 and the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| Christopher Ramsay | 0.2 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |
| Katie Mak | 8.80 | \$300-\$400 | no discount |
| James R. Schmidt | 0.50 | \$545-\$560 | no discount |
| Lucya Kowalewski | 1.40 | \$300-\$395 | no discount |

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|------------------|-------|---------------|--------------------------|
| Sean Tessarolo | 3.60 | \$260-\$350 | no discount |
| Paralegals | 7.50 | \$100-\$250 | no discount |
| Legal Assistants | 0.40 | \$80 | no discount |

102. The services provided to the Trustee and outlined in the Jeshani Accounts included the following:

- (a) communicating and negotiating with counsel for Fayyaz Jeshani and Shabira Jeshani (the "**Jeshanis**");
- (b) reviewing documentation regarding the Jeshanis available to the Trustee;
- (c) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by the Jeshanis (the "**Jeshanis Funds**");
- (d) working with the Forensic Accountant in reviewing and analyzing the documents relating to the transfers made to and from the Debtors' accounts with respect to the Jeshanis Funds;
- (e) reviewing and considering the documentation provided by counsel for the Jeshanis with respect to additional funds invested by the Jeshanis into the Scheme;
- (f) reviewing and preparing demand letters to the Jeshanis;
- (g) drafting materials and preparing List of Documents; and
- (h) conducting and reviewing Land Title Office searches.

SERVICES RENDERED FOR 41777-0021 MIRZA JESANI AND SHAHNAZ JESANI

103. Attached hereto and marked as **Exhibit "T"** to this my Affidavit are copies of the following accounts (the "**Jesani Accounts**") rendered by CW in connection with matter #41777-0021 (Mirza Jesani and Shahnaz Jesani) which cover legal services, disbursements and taxes from May 25, 2016 to March 30, 2019:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|--------------|----------|---------------|----------|----------|
| 2001903 | June 1, 2016 | \$840.00 | \$8.85 | \$101.24 | \$950.09 |

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|-------------|---------------|------------|--------------------|
| 2012140 | October 1, 2016 | \$110.00 | \$0.90 | \$13.25 | \$124.15 |
| 2018573 | January 1, 2017 | \$20.00 | \$33.75 | \$2.67 | \$56.42 |
| 2021166 | February 1, 2017 | \$774.50 | \$10.05 | \$93.45 | \$878.00 |
| 2023321 | March 1, 2017 | \$390.00 | \$0.60 | \$46.83 | \$437.43 |
| 2024752 | April 1, 2017 | \$4,054.00 | \$23.75 | \$487.67 | \$4,565.42 |
| 2030526 | June 1, 2017 | \$432.00 | \$2.10 | \$51.95 | \$486.05 |
| 2033175 | July 1, 2017 | \$1,222.00 | \$2.70 | \$146.78 | \$1,371.48 |
| 2034985 | August 1, 2017 | \$2,870.00 | \$224.50 | \$345.63 | \$3,440.13 |
| 2037067 | September 1, 2017 | \$2,126.00 | \$5.55 | \$255.43 | \$2,386.98 |
| 2038626 | October 1, 2017 | \$60.00 | \$1.35 | \$7.27 | \$68.62 |
| 2041267 | November 1, 2017 | \$8,749.00 | \$496.00 | \$1,070.90 | \$10,315.90 |
| 2043484 | December 1, 2017 | \$645.00 | \$960.65 | \$125.43 | \$1,731.08 |
| 2046253 | January 1, 2018 | \$1,160.00 | \$1.35 | \$139.27 | \$1,300.62 |
| 2049588 | February 1, 2018 | \$1,040.00 | \$6.00 | \$125.10 | \$1,171.10 |
| 2052986 | April 1, 2018 | \$5,466.00 | \$823.13 | \$696.13 | \$6,985.26 |
| 2054921 | May 1, 2018 | \$888.00 | \$1.20 | \$106.62 | \$995.82 |
| 2058516 | June 1, 2018 | \$4,274.00 | \$83.85 | \$517.07 | \$4,874.92 |
| 2060242 | July 1, 2018 | \$11,765.00 | \$162.05 | \$1,419.18 | \$13,346.23 |
| 2062592 | August 1, 2018 | \$2,462.00 | \$6.75 | \$295.78 | \$2,764.53 |
| 2064315 | September 1, 2018 | \$528.00 | \$18.45 | \$64.28 | \$610.73 |
| 2066830 | October 1, 2018 | \$1,587.00 | \$21.95 | \$190.84 | \$1,799.79 |
| 2069082 | November 1, 2018 | \$283.00 | \$1.20 | \$34.02 | \$318.22 |
| 2073129 | December 1, 2018 | \$3,296.00 | \$18.60 | \$396.45 | \$3,711.05 |
| 2075451 | January 1, 2019 | \$8,336.00 | \$96.50 | \$1,004.42 | \$9,436.92 |
| 2077878 | February 1, 2019 | \$0.00 | \$2,251.50 | \$112.58 | \$2,364.08 |
| 2079797 | March 1, 2019 | \$250.00 | \$0.60 | \$30.03 | \$280.63 |
| 2082265 | April 1, 2019 | \$320.00 | \$0.75 | \$38.44 | \$359.19 |
| TOTAL | | | | | \$77,130.84 |

104. The Jesani Accounts are in the amount of \$64,690.02 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| Christopher Ramsay | 14.00 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 |

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| | | | No discount thereafter |
| Katie Mak | 93.60 | \$300-\$400 | no discount |
| James R. Schmidt | 12.80 | \$545-\$560 | no discount |
| Lucya Kowalewski | 4.50 | \$300-\$395 | no discount |
| Rachael Mezzarobba | 0.20 | \$320-\$425 | no discount |
| Gordon Behan | 0.20 | \$340 | no discount |
| Articling Students | 1.10 | \$130-\$200 | \$130 until January 2018 No discount thereafter |
| Paralegals | 94.30 | \$100-\$250 | no discount |
| Legal Assistants | 1.60 | \$80 | no discount |

105. The services provided to the Trustee and outlined in the Jesani Accounts included the following:

- (a) communicating and negotiating with counsel for Mirza Jesani and Shahnaz Jesani (the "Jesanis");
- (b) reviewing documentation regarding the Jesanis available to the Trustee;
- (c) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by the Jesanis (the "Jesani Funds");
- (d) working with the Forensic Accountant in reviewing and analyzing the documents relating to the transfers made to and from the Debtors' accounts with respect to the Jesani Funds;
- (e) reviewing, analyzing and considering evidence of Mirza Jesani given in course of Examinations for Discovery;
- (f) attending to scheduling Examinations for Discovery, trial management conference, mediation and trial dates;
- (g) drafting of amended Notice of Civil Claim;
- (h) preparing for and attending Examination for Discovery of Mirza Jesani;
- (i) reviewing and considering List of Documents;

- (j) conducting and reviewing Land Title searches;
- (k) conducting legal research on Shahnaz Jesani's death and consider process to substitute estate as a defendant in B.C.;
- (l) reviewing and preparing materials for application regarding production of requests at Examination for Discovery of Mirza Jesani;
- (m) reviewing and preparing Notice to Admit;
- (n) reviewing and preparing Notice to Mediate; and
- (o) reviewing, preparing and serving Mediation Brief.

SERVICES RENDERED FOR 41777-0024 SHENAZ DHARAMSHI

106. Attached hereto and marked as **Exhibit "U"** to this my Affidavit are copies of the following accounts (the "**Dharamshi Accounts**") rendered by CW in connection with matter #41777-0024 (Shenaz Dharamshi) which cover legal services, disbursements and taxes from November 4, 2015 to March 30, 2019:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|------------|---------------|------------|-------------|
| 2001902 | June 1, 2016 | \$1,300.00 | \$7.20 | \$156.36 | \$1,463.56 |
| 2012127 | October 1, 2016 | \$180.00 | \$1.50 | \$21.68 | \$203.18 |
| 2014361 | November 1, 2016 | \$364.50 | \$16.90 | \$44.60 | \$426.00 |
| 2017338 | December 1, 2016 | \$559.00 | \$47.70 | \$67.58 | \$674.28 |
| 2021167 | February 1, 2017 | \$422.50 | \$2.70 | \$50.85 | \$476.05 |
| 2023319 | March 1, 2017 | \$2,656.00 | \$4.95 | \$318.97 | \$2,979.92 |
| 2024751 | April 1, 2017 | \$5,644.00 | \$33.00 | \$678.93 | \$6,355.93 |
| 2026992 | May 1, 2017 | \$6,980.00 | \$386.95 | \$842.73 | \$8,209.68 |
| 2030525 | June 1, 2017 | \$9,577.50 | \$109.00 | \$1,154.29 | \$10,840.79 |
| 2033176 | July 1, 2017 | \$1,476.00 | \$1,876.30 | \$260.93 | \$3,613.23 |
| 2034984 | August 1, 2017 | \$202.00 | \$1.50 | \$24.32 | \$227.82 |
| 2037066 | September 1, 2017 | \$246.00 | \$1.65 | \$29.60 | \$277.25 |
| 2038628 | October 1, 2017 | \$3,464.00 | \$137.50 | \$418.21 | \$4,019.71 |
| 2041266 | November 1, 2017 | \$176.00 | \$29.28 | \$21.35 | \$226.63 |
| 2043482 | December 1, 2017 | \$60.00 | \$0.90 | \$7.25 | \$68.15 |
| 2049591 | February 1, 2018 | \$152.00 | \$0.90 | \$18.29 | \$171.19 |
| 2050755 | March 1, 2018 | \$3,420.00 | \$20.40 | \$411.42 | \$3,851.82 |
| 2052987 | April 1, 2018 | \$304.00 | \$0.90 | \$36.53 | \$341.43 |

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|------------|---------------|------------|--------------------|
| 2054920 | May 1, 2018 | \$450.00 | \$18.35 | \$54.20 | \$522.55 |
| 2058078 | June 1, 2018 | \$2,024.00 | \$29.70 | \$244.37 | \$2,298.07 |
| 2060245 | July 1, 2018 | \$4,205.00 | \$57.00 | \$507.45 | \$4,769.45 |
| 2062596 | August 1, 2018 | \$9,043.00 | \$200.38 | \$1,095.18 | \$10,338.56 |
| 2064312 | September 1, 2018 | \$3,326.00 | \$59.80 | \$399.72 | \$3,785.52 |
| 2066841 | October 1, 2018 | \$556.00 | \$6.24 | \$67.03 | \$629.27 |
| 2069070 | November 1, 2018 | \$2,282.00 | \$2.55 | \$273.97 | \$2,558.52 |
| 2073127 | December 1, 2018 | \$300.00 | \$19.80 | \$36.99 | \$356.79 |
| 2082262 | April 1, 2019 | \$36.00 | \$44.95 | \$6.07 | \$87.02 |
| TOTAL | | | | | \$69,772.37 |

107. The Dharamshi Accounts are in the amount of \$69,685.35 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| Christopher Ramsay | 7.10 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |
| Katie Mak | 81.50 | \$300-\$400 | no discount |
| James R. Schmidt | 27.50 | \$545-\$560 | no discount |
| Lucya Kowalewski | 11.0 | \$300-\$395 | no discount |
| Rachael Mezzarobba | 0.30 | \$320-\$425 | no discount |
| Brendan Morley | 0.20 | \$370 | no discount |
| Articling Students | 3.40 | \$130-\$200 | \$130 until January 2018 No discount thereafter |
| Paralegals | 56.70 | \$100-\$250 | no discount |
| Legal Assistants | 4.20 | \$80 | no discount |

108. The services provided to the Trustee and outlined in the Dharamshi Accounts included the following:

- (a) communicating and negotiating with counsel for Shenaz Dharamshi ("Dharamshi");
- (b) reviewing documentation regarding Dharamshi available to the Trustee;

- (c) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by Dharamshi (the "**Dharamshi Funds**");
- (d) working with the Forensic Accountant in reviewing and analyzing the documents relating to the transfers made to and from the Debtors' accounts with respect to the Dharamshi Funds;
- (e) reviewing transcripts from section 163 examination of Dharamshi and her ex-husband, Karim Chagani;
- (f) reviewing, considering and filing Notice of Intention to Proceed;
- (g) attending to scheduling Examination for Discovery, trial management conference and Trial date;
- (h) reviewing and preparing Appointment to Examine for Discovery for Karim Chagani including preparing letter and serving same;
- (i) conducting and reviewing land title searches for Dharamshi and Karim Chagani;
- (j) preparing and attending Examination for Discovery of Karim Chagani;
- (k) considering legal issue of competency to attend Examination for Discovery;
- (l) consider issue of fraudulent conveyance of properties owned or formerly owned by the Dharamshi and Karim Chagani;
- (m) conducting legal research on fraudulent conveyance of property, liability of joint account holders and preparing memorandum regarding same;
- (n) coordinating with the Law Society of B.C. regarding the appointment of a custodian over Dharamshi's counsel's practice;
- (o) reviewing and preparing Requisition adjourning application;
- (p) reviewing, analyzing and considering Examination for Discovery transcripts of Dharamshi;

- (q) reviewing and preparing Notice of Application and supporting Affidavits for an Order for production of documents requested at Examinations for Discovery;
- (r) reviewing and preparing Notice to Admit;
- (s) reviewing and preparing Settlement Agreement;
- (t) reviewing and preparing Notice of Discontinuance on Chagani; and
- (u) reviewing and preparing Requisition adjourning trial, preparing and serving letter to counsel for Dharamshi.

SERVICES RENDERED FOR 41777-0026 CHARITIES

109. Attached hereto and marked as **Exhibit "V"** to this my Affidavit are copies of the following accounts (the "**Charities Accounts**") rendered by CW in connection with matter #41777-0026 (Charities) which cover legal services, disbursements and taxes from March 29, 2016 to March 22, 2018:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-----------------|----------|---------------|----------|-------------------|
| 1998123 | April 1, 2016 | \$200.00 | \$4.95 | \$24.25 | \$229.20 |
| 2018574 | January 1, 2017 | \$100.00 | \$0.00 | \$12.00 | \$112.00 |
| 2025857 | April 7, 2017 | \$860.00 | \$0.90 | \$103.25 | \$964.15 |
| 2026995 | May 1, 2017 | \$400.00 | \$0.90 | \$48.05 | \$448.95 |
| 2050754 | March 1, 2018 | \$360.00 | \$0.00 | \$43.20 | \$403.20 |
| 2052990 | April 1, 2018 | \$240.00 | \$0.45 | \$28.82 | \$269.27 |
| TOTAL | | | | | \$2,426.77 |

110. The Charities Accounts are in the amount of \$2,426.77 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| Christopher Ramsay | 4.00 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |
| Paralegals | 0.60 | \$100-\$250 | no discount |

111. The services provided to the Trustee and outlined in the Charities Accounts included the following:

- (a) communicating and negotiating with counsel for the Aga Khan Foundation (the "AKF") regarding claims brought against the AKF in relation to amounts received directly or indirectly by AKF from the Scheme (the "AKF Funds");
- (b) reviewing documentation regarding AKF available to the Trustee;
- (c) working with the Forensic Accountant in reviewing and analyzing the documents relating to the transfers made to and from the Debtors' accounts with respect to the AKF Funds;
- (d) reviewing, considering and advising the Trustee regarding claim against AKF and AKF's position; and
- (e) reviewing, negotiating and revising settlement agreement.

SERVICES RENDERED FOR 41777-0027 AL-HASHMI BHARWANI

112. Attached hereto and marked as **Exhibit "W"** to this my Affidavit are copies of the following accounts (the "**Bharwani Accounts**") rendered by CW in connection with matter #41777-0027 (Al-Hashmi Bharwani) which cover legal services, disbursements and taxes from May 2, 2016 to December 12, 2017:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|------------|---------------|----------|------------|
| 2001898 | June 1, 2016 | \$727.00 | \$8.25 | \$87.65 | \$822.90 |
| 2009677 | September 1, 2016 | \$271.50 | \$6.15 | \$32.90 | \$310.55 |
| 2012125 | October 1, 2016 | \$2,164.00 | \$660.13 | \$292.69 | \$3,116.82 |
| 2014337 | November 1, 2016 | \$2,811.50 | \$643.00 | \$369.55 | \$3,824.05 |
| 2017384 | December 1, 2016 | \$7,267.00 | \$162.11 | \$880.15 | \$8,309.26 |
| 2018576 | January 1, 2017 | \$2,073.00 | \$195.15 | \$253.82 | \$2,521.97 |
| 2023317 | March 1, 2017 | \$452.00 | \$2.40 | \$54.36 | \$508.76 |
| 2024749 | April 1, 2017 | \$764.00 | \$3.90 | \$91.88 | \$859.78 |
| 2026997 | May 1, 2017 | \$1,176.00 | \$10.20 | \$141.63 | \$1,327.83 |
| 2030519 | June 1, 2017 | \$924.00 | \$1.20 | \$110.94 | \$1,036.14 |
| 2033177 | July 1, 2017 | \$488.00 | \$1.95 | \$58.66 | \$548.61 |
| 2034978 | August 1, 2017 | \$2,432.00 | \$242.35 | \$293.96 | \$2,968.31 |
| 2037064 | September 1, 2017 | \$724.00 | \$2.55 | \$87.01 | \$813.56 |

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|------------------|----------|---------------|---------|--------------------|
| 2038643 | October 1, 2017 | \$120.00 | \$1.65 | \$14.48 | \$136.13 |
| 2043479 | December 1, 2017 | \$424.00 | \$22.32 | \$52.00 | \$498.32 |
| 2049577 | February 1, 2018 | \$32.00 | \$9.63 | \$4.32 | \$45.95 |
| TOTAL | | | | | \$27,648.94 |

113. The Bharwani Accounts are in the amount of \$27,648.94 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--------------------------|
| James R. Schmidt | 23.30 | \$545-\$560 | no discount |
| Alexandra Andrisoi | 33.60 | \$240-\$295 | no discount |
| Legal Assistants | 13.40 | \$80 | no discount |

114. The services provided to the Trustee and outlined in the Bharwani Accounts included the following:

- (a) communicating and negotiating with counsel for Al-Hashmi Bharwani ("**Bharwani**");
- (b) reviewing documentation regarding Bharwani available to the Trustee;
- (c) working with the Trustee and considering analysis of the Forensic Accountant regarding Funds received directly or indirectly by Bharwani (the "**Bharwani Funds**");
- (d) working with the Forensic Accountant in reviewing and analyzing the documents relating to the transfers made to and from the Debtors' accounts with respect to the Bharwani Funds;
- (e) attending to scheduling Examinations for Discovery and trial;
- (f) considering preparation of expert report by the Forensic Accountant;
- (g) preparing for and attending at Examination for Discovery of Bharwani;
- (h) considering terms and preparing settlement offer;
- (i) reviewing and preparing Notice to Admit;

- (j) conducting and reviewing land title searches;
- (k) drafting and revising Notice of Application and supporting Affidavit;
- (l) drafting Notice to Mediate and letter and coordinating service of same;
- (m) attending to scheduling Trial Management Conference;
- (n) drafting and filing Requisition adjourning the plaintiff's application and letter and coordinating service of same;
- (o) considering and analyzing statutory declaration from Bharwani regarding financial circumstances;
- (p) drafting Consent to Judgment;
- (q) drafting notice extending time for obtaining Inspector approval;
- (r) reviewing and revising Requisition adjourning trial; and
- (s) preparing Consent Dismissal Order, letter and coordinating service of same.

SERVICES RENDERED FOR 41777-0029 ARBITRUST AG

115. Attached hereto and marked as **Exhibit "X"** to this my Affidavit are copies of the following accounts (the "**Arbitrust Accounts**") rendered by CW in connection with matter #41777-0029 (Arbitrust AG) which cover legal services, disbursements and taxes from June 20, 2016 to November 8, 2018:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|-------------|---------------|------------|-------------|
| 2005731 | July 1, 2016 | \$8,490.00 | \$16.20 | \$1,019.61 | \$9,525.81 |
| 2007276 | August 1, 2016 | \$5,945.50 | \$852.25 | \$756.08 | \$7,553.83 |
| 2009676 | September 1, 2016 | \$11,462.50 | \$267.80 | \$1,378.90 | \$13,109.20 |
| 2012123 | October 1, 2016 | \$748.50 | \$1.05 | \$89.88 | \$839.43 |
| 2014362 | November 1, 2016 | \$105.00 | \$912.67 | \$58.23 | \$1,075.90 |
| 2017381 | December 1, 2016 | \$778.00 | \$0.90 | \$93.41 | \$872.31 |
| 2018577 | January 1, 2017 | \$461.00 | \$41.35 | \$57.39 | \$559.74 |
| 2021168 | February 1, 2017 | \$381.50 | \$561.80 | \$73.88 | \$1,017.18 |
| 2024748 | April 1, 2017 | \$1,214.00 | \$16.65 | \$146.51 | \$1,377.16 |
| 2026998 | May 1, 2017 | \$2,423.00 | \$134.56 | \$293.49 | \$2,851.05 |
| 2030516 | June 1, 2017 | \$892.00 | \$1.95 | \$107.14 | \$1,001.09 |

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|------------|---------------|----------|--------------------|
| 2033163 | July 1, 2017 | \$1,844.00 | \$561.65 | \$249.36 | \$2,655.01 |
| 2034976 | August 1, 2017 | \$852.00 | \$2.25 | \$102.35 | \$956.60 |
| 2037063 | September 1, 2017 | \$2,080.00 | \$0.60 | \$249.63 | \$2,330.23 |
| 2041265 | November 1, 2017 | \$920.00 | \$1.65 | \$110.48 | \$1,032.13 |
| 2049581 | February 1, 2018 | \$288.00 | \$0.00 | \$34.56 | \$322.56 |
| 2058077 | June 1, 2018 | \$7,077.00 | \$6.00 | \$849.54 | \$7,932.54 |
| 2060250 | July 1, 2018 | \$4,391.00 | \$98.90 | \$531.52 | \$5,021.42 |
| 2066839 | October 1, 2018 | \$259.00 | \$76.35 | \$34.90 | \$370.25 |
| 2073126 | December 1, 2018 | \$337.00 | \$0.90 | \$40.49 | \$378.39 |
| TOTAL | | | | | \$60,781.83 |

116. The Arbitrust Accounts are in the amount of \$60,781.83 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| Christopher Ramsay | 7.60 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |
| Katie Mak | 6.00 | \$300-\$400 | no discount |
| James R. Schmidt | 15.70 | \$545-\$560 | no discount |
| Lucya Kowalewski | 76.20 | \$300-\$395 | no discount |
| Alexandra Andrisoi | 1.50 | \$240-\$295 | no discount |
| Articling Students | 0.40 | \$130-\$200 | \$130 until January 2018 No discount thereafter |
| Paralegals | 77.40 | \$100-\$250 | no discount |
| Legal Assistants | 3.20 | \$80 | no discount |

117. The services provided to the Trustee and outlined in the Arbitrust Account included the following:

- (a) reviewing documentation regarding Arbitrust AG available to the Trustee;
- (b) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by Arbitrust AG (the "Arbitrust AG Funds");

- (c) working with the Forensic Accountant in reviewing and analyzing the documents relating to the transfers made to and from the Debtors' accounts with respect to the Arbitrust AG Funds;
- (d) reviewing, analyzing and considering evidence of Ms. Samji given in the course of Securities Commission interviews;
- (e) drafting Notice of Civil Claim;
- (f) conducting and reviewing corporate searches;
- (g) conducting research on Hague Convention terms of service and signatories;
- (h) coordinating skip tracing services;
- (i) reviewing and analyzing process server's report on service attempts on Jessani;
- (j) drafting Notice of Application for substitute service;
- (k) reviewing and revising Affidavit of Trustee;
- (l) preparing for and attending court for order for substituted service on Jessani;
- (m) reviewing Response to Civil Claim and providing comments;
- (n) reviewing and considering interview with Ms. Samji regarding Jessani's involvement in the Scheme;
- (o) reviewing and revising Amended Notice of Civil Claim for conspiracy claim; and
- (p) conducting legal research on pleadings of alter ego, conspiracy, lifting corporate veil and damages in cases of fraud and tort of civil conspiracy.

SERVICES RENDERED FOR 41777-0030 MEHBOOB SHIVJI AND NABADBANU SHIVJI

118. Attached hereto and marked as **Exhibit "Y"** to this my Affidavit are copies of the following accounts (the "**Shivji Accounts**") rendered by CW in connection with matter

#41777-0030 (Mehboob Shivji and Nabadbanu Shivji) which cover legal services, disbursements and taxes from February 1, 2016 to October 9, 2018:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|-------------|---------------|------------|--------------------|
| 1998124 | April 1, 2016 | \$108.00 | \$6.45 | \$13.28 | \$127.73 |
| 2001897 | June 1, 2016 | \$6,500.00 | \$110.35 | \$782.21 | \$7,392.56 |
| 2007206 | August 1, 2016 | \$1,508.00 | \$273.20 | \$184.62 | \$1,965.82 |
| 2009673 | September 1, 2016 | \$0.00 | \$273.15 | \$13.66 | \$286.81 |
| 2012118 | October 1, 2016 | \$270.00 | \$0.45 | \$32.42 | \$302.87 |
| 2018578 | January 1, 2017 | \$70.00 | \$0.90 | \$8.45 | \$79.35 |
| 2021169 | February 1, 2017 | \$638.00 | \$5.70 | \$76.84 | \$720.54 |
| 2023315 | March 1, 2017 | \$532.50 | \$1.05 | \$63.96 | \$597.51 |
| 2024747 | April 1, 2017 | \$948.00 | \$3.45 | \$113.93 | \$1,065.38 |
| 2030512 | June 1, 2017 | \$280.00 | \$1.50 | \$33.68 | \$315.18 |
| 2033180 | July 1, 2017 | \$15,926.00 | \$127.72 | \$1,917.55 | \$17,971.27 |
| 2034975 | August 1, 2017 | \$2,244.00 | \$16.60 | \$270.11 | \$2,530.71 |
| 2037061 | September 1, 2017 | \$1,362.00 | \$1,925.55 | \$259.72 | \$3,547.27 |
| 2038644 | October 1, 2017 | \$84.00 | \$25.20 | \$11.34 | \$120.54 |
| 2041262 | November 1, 2017 | \$648.00 | \$30.30 | \$79.28 | \$757.58 |
| 2043475 | December 1, 2017 | \$188.00 | \$169.65 | \$27.04 | \$384.69 |
| 2046247 | January 1, 2018 | \$1,618.00 | \$38.40 | \$196.08 | \$1,852.48 |
| 2049604 | February 1, 2018 | \$1,476.50 | \$2.40 | \$177.31 | \$1,656.21 |
| 2050753 | March 1, 2018 | \$358.00 | \$1.35 | \$43.03 | \$402.38 |
| 2052991 | April 1, 2018 | \$3,582.50 | \$52.30 | \$432.53 | \$4,067.33 |
| 2054918 | May 1, 2018 | \$628.00 | \$299.75 | \$78.35 | \$1,006.10 |
| 2058017 | June 1, 2018 | \$5,006.50 | \$17.25 | \$601.65 | \$5,625.40 |
| 2060257 | July 1, 2018 | \$7,260.50 | \$44.40 | \$873.49 | \$8,178.39 |
| 2062600 | August 1, 2018 | \$12,560.00 | \$149.30 | \$1,514.67 | \$14,223.97 |
| 2064311 | September 1, 2018 | \$126.00 | \$2,089.30 | \$115.59 | \$2,330.89 |
| 2073125 | December 1, 2018 | \$54.00 | \$10.45 | \$7.00 | \$71.45 |
| TOTAL | | | | | \$77,580.41 |

119. The Shivji Accounts are in the amount of \$77,580.41 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--------------------------|
| Christopher Ramsay | 13.10 | \$500 - \$600 | \$500 until October 2016 |

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| | | | \$560 until January 2018 No discount thereafter |
| Katie Mak | 30.30 | \$300-\$400 | no discount |
| James R. Schmidt | 16.60 | \$545-\$560 | no discount |
| Lucya Kowalewski | 22.10 | \$300-\$395 | no discount |
| Alexandra Andrisoi | 76.70 | \$240-\$295 | no discount |
| Paralegals | 48.20 | \$100-\$250 | no discount |
| Legal Assistants | 10.20 | \$80 | no discount |

120. The services provided to the Trustee and outlined in the Shivji Accounts included the following:

- (a) reviewing documentation regarding Mehboob Shivji and Nabadbanu Shivji (the "**Shivjis**") available to the Trustee;
- (b) communicating and negotiating with counsel for the Shivjis;
- (c) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by the Shivjis (the "**Shivji Funds**");
- (d) working with the Forensic Accountant regarding the documentation supporting the transactions to and from the Debtors' accounts with respect to the Shivji Funds;
- (e) conducting and reviewing corporate searches for companies which received the Shivji Funds;
- (f) considering claim enforcement strategy, potential examination of Ms. Samji and conferences related thereto;
- (g) preparing section 163 examination of the Shivjis pursuant to the BIA and coordinating service of same;
- (h) conducting and reviewing Land Title Office searches;
- (i) reviewing, preparing and attending examination of the Shivjis;
- (j) reviewing transcripts of respective examinations of the Shivjis and of Ms. Samji by the Securities Commission;

- (k) reviewing and considering transcript from section 163 examination of the Shivjis and advising the Trustee with respect to same;
- (l) preparing Notice of Civil Claim;
- (m) reviewing and considering Response to Civil Claim;
- (n) attending to scheduling of Trial Management Conference, mediation and trial dates;
- (o) preparing Amended Notice of Civil Claim;
- (p) preparing for and attending Examination for Discovery;
- (q) preparing List of Documents;
- (r) reviewing and considering Shivjis' document production;
- (s) reviewing and considering Mehboob Shivji's Securities Commission hearing testimony and section 163 examination;
- (t) preparing materials for discovery of Nabadbanu and Adil Shivji, including traveling to and from and attending discovery;
- (u) reviewing and analyzing s.163 examination of Shivjis;
- (v) reviewing and considering Amended List of Documents received from defendants;
- (w) reviewing, revising and finalizing application for production of Examination for Discovery requests;
- (x) reviewing and considering settlement letter from Shivjis;
- (y) drafting settlement offer to Shivjis;
- (z) considering strategy and upcoming trial;
- (aa) coordinating preparation of expert report from the Forensic Accountant including review of documents to be provided in support of expert opinion;
- (bb) preparing Notice of Mediation;
- (cc) reviewing of documents and preparing for and attending mediation;

- (dd) preparing, filing and serving Trial and Mediation Brief;
- (ee) reviewing defendants' Second Amended List of Documents and Trial Brief;
- (ff) reviewing and considering minutes of settlement from mediation; and
- (gg) reviewing and preparing Settlement Agreement, Requisition and Consent Dismissal Order.

SERVICES RENDERED FOR 41777-0031 PARMINDER VICKRAM, CAMERON VICKRAM, MOHINDER SINGH SANDHU AND ATUL K. MEHRA

121. Attached hereto and marked as **Exhibit "Z"** to this my Affidavit is a copy of Invoice #2009672 (the "**Vickram Account**") rendered by CW in connection with matter #41777-0031 (Parminder Vickram, Cameron Vickram, Mohinder Singh Sandhu and Atul K. Mehra) which covers legal fees, disbursements and taxes on August 31, 2016.

122. The Vickram Account is in the amount of \$840.00 and includes the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| Christopher Ramsay | 1.50 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |

123. The services provided to the Trustee and outlined in the Vickram Account included the following:

- (a) communicating and negotiating with counsel for Parminder Vickram, Cameron Vickram, Mohinder Singh Sandhu and Atul K. Mehra (the "**Vikrams**");
- (b) reviewing materials from counsel to the Vikrams in relation to Case Management Conference; and
- (c) considering strategy and attending to conferences related thereto.

SERVICES RENDERED FOR 41777-0032 SUNIL SINHA

124. Attached hereto and marked as **Exhibit "AA"** to this my Affidavit are copies of the following accounts (the "**Sinha Accounts**") rendered by CW in connection with matter #41777-0032 (Sunil Sinha) which cover legal services, disbursements and taxes from February 29, 2016 to March 30, 2019:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|-------------|---------------|------------|-------------|
| 1997272 | March 1, 2016 | \$144.00 | \$226.85 | \$18.62 | \$389.47 |
| 1998126 | April 1, 2016 | \$904.50 | \$18.45 | \$109.47 | \$1,032.42 |
| 1999827 | May 1, 2016 | \$1,072.00 | \$43.10 | \$130.79 | \$1,245.89 |
| 2001895 | June 1, 2016 | \$148.50 | \$6.30 | \$18.15 | \$172.95 |
| 2005630 | July 1, 2016 | \$244.00 | \$4.50 | \$29.51 | \$278.01 |
| 2007208 | August 1, 2016 | \$998.50 | \$4.50 | \$120.06 | \$1,123.06 |
| 2009670 | September 1, 2016 | \$80.50 | \$123.45 | \$15.84 | \$219.79 |
| 2012110 | October 1, 2016 | \$589.50 | \$1.05 | \$70.80 | \$661.35 |
| 2014339 | November 1, 2016 | \$1,904.50 | \$18.60 | \$229.48 | \$2,152.58 |
| 2017378 | December 1, 2016 | \$582.00 | \$66.90 | \$70.35 | \$719.25 |
| 2018579 | January 1, 2017 | \$644.00 | \$1.35 | \$77.35 | \$722.70 |
| 2021172 | February 1, 2017 | \$7,265.50 | \$1,092.20 | \$926.49 | \$9,284.19 |
| 2023308 | March 1, 2017 | \$3,422.50 | \$4.96 | \$410.96 | \$3,838.42 |
| 2024744 | April 1, 2017 | \$2,692.00 | \$60.60 | \$326.07 | \$3,078.67 |
| 2027000 | May 1, 2017 | \$3,144.00 | \$250.86 | \$379.82 | \$3,774.68 |
| 2030508 | June 1, 2017 | \$1,960.00 | \$120.10 | \$237.21 | \$2,317.31 |
| 2033181 | July 1, 2017 | \$356.00 | \$24.50 | \$43.95 | \$424.45 |
| 2034971 | August 1, 2017 | \$480.00 | \$2.25 | \$57.71 | \$539.96 |
| 2037060 | September 1, 2017 | \$1,448.00 | \$6.90 | \$174.11 | \$1,629.01 |
| 2038647 | October 1, 2017 | \$56.00 | \$1.20 | \$6.78 | \$63.98 |
| 2041258 | November 1, 2017 | \$440.00 | \$1.65 | \$52.88 | \$494.53 |
| 2043471 | December 1, 2017 | \$1,762.00 | \$24.30 | \$212.66 | \$1,998.96 |
| 2046245 | January 1, 2018 | \$100.00 | \$130.95 | \$18.55 | \$249.50 |
| 2052992 | April 1, 2018 | \$596.00 | \$0.45 | \$71.54 | \$667.99 |
| 2054915 | May 1, 2018 | \$1,750.50 | \$35.40 | \$211.84 | \$1,997.74 |
| 2057990 | June 1, 2018 | \$13,212.50 | \$112.68 | \$1,591.14 | \$14,916.32 |
| 2060348 | July 1, 2018 | \$19,588.50 | \$931.45 | \$2,397.20 | \$22,917.15 |
| 2062615 | August 1, 2018 | \$21,743.00 | \$650.70 | \$2,624.65 | \$25,018.35 |
| 2064302 | September 1, 2018 | \$3,950.50 | \$105.75 | \$476.07 | \$4,532.32 |
| 2066803 | October 1, 2018 | \$3,248.00 | \$27.91 | \$391.16 | \$3,667.07 |

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|------------------|------------|---------------|----------|---------------------|
| 2069067 | November 1, 2018 | \$2,740.00 | \$11.60 | \$329.38 | \$3,080.98 |
| 2073122 | December 1, 2018 | \$1,937.00 | \$1.20 | \$232.50 | \$2,170.70 |
| 2075447 | January 1, 2019 | \$460.00 | \$2,718.93 | \$190.39 | \$3,369.32 |
| 2077881 | February 1, 2019 | \$1,068.50 | \$95.31 | \$129.66 | \$1,293.47 |
| 2082259 | April 1, 2019 | \$118.50 | \$5.00 | \$14.48 | \$137.98 |
| TOTAL | | | | | \$120,180.52 |

125. The Sinha Accounts are in the amount of \$115,379.75 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| Christopher Ramsay | 26.80 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |
| Katie Mak | 2.40 | \$300-\$400 | no discount |
| James R. Schmidt | 27.90 | \$545-\$560 | no discount |
| Lucya Kowalewski | 9.00 | \$300-\$395 | no discount |
| Alexandra Andrisoi | 71.20 | \$240-\$295 | no discount |
| Shauna Towriss | 1.60 | \$450 | no discount |
| Articling Students | 0.90 | \$130-\$200 | \$130 until January 2018 No discount thereafter |
| Paralegals | 79.60 | \$100-\$250 | no discount |
| Legal Assistants | 55.50 | \$80 | no discount |

126. The services provided to the Trustee and outlined in the Sinha Accounts included the following:

- (a) communicating and negotiating with counsel for Sunil Sinha ("**Sinha**");
- (b) reviewing documentation regarding Sinha available to the Trustee;
- (c) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by Sinha (the "**Sinha Funds**");

- (d) working with the Forensic Accountant regarding the documentation supporting the transactions to and from the Debtors' accounts with respect to Sinha Funds;
- (e) reviewing and preparing List of Documents and Amended List of Documents;
- (f) considering document production and evidentiary issues;
- (g) attending to scheduling Examination for Discovery and trial dates;
- (h) preparing for and attending Examinations for Discovery;
- (i) reviewing request for additional document disclosure from opposing counsel and identifying additional documents for disclosure;
- (j) conducting and reviewing Land Title Office searches;
- (k) reviewing and preparing documents to be produced to opposing counsel;
- (l) reviewing, analyzing and considering transcripts from Examination for Discovery;
- (m) reviewing and preparing Notice to Admit;
- (n) reviewing and preparing settlement letter to Sinha's counsel;
- (o) reviewing and preparing Notice of Application seeking responses to examination requests from Sinha and supporting Affidavit;
- (p) preparing and filing Requisition adjourning application;
- (q) preparing Appointment for continuation of Examination for Discovery;
- (r) reviewing and considering response to Notice to Admit and further requests for information from the Forensic Accountant;
- (s) reviewing and considering document disclosure from counsel for Sinha and advising Trustee with respect to same;
- (t) coordinating preparation of expert report from the Forensic Accountant;
- (u) drafting RBC affidavit regarding evidence at trial;

- (v) conducting legal research regarding submission of financial records as evidence at trial;
- (w) preparing Notice to Mediate;
- (x) preparing affidavit for TD Bank regarding authenticity of documents;
- (y) reviewing and preparing Agreed Statement of Facts;
- (z) reviewing and considering disputed transactions;
- (aa) reviewing, preparing and considering Mediation Brief;
- (bb) reviewing settlement agreement;
- (cc) conducting and reviewing mortgage documents;
- (dd) reviewing, drafting and filing Form B Mortgage and supporting documents;
- (ee) reviewing, considering, strategy, preparing materials for and attending mediation;
- (ff) reviewing, preparing and filing Consent Dismissal Order;
- (gg) reviewing and preparing Notice of Application and Order to approve settlement agreement and release of Sinha;
- (hh) reviewing, preparing and executing Affidavit of Trustee;
- (ii) drafting oral submissions for hearing of settlement approval;
- (jj) preparing for hearing of settlement approval of Sinha and entering signed order with the court registry; and
- (kk) attending to payment of settlement funds pursuant to terms of settlement agreement.

SERVICES RENDERED FOR 41777-0033 GOLNAZ EBRAHIM BABAEE VAARNOOS AND MAHNAZ EBRAHIM BABAEE

127. Attached hereto and marked as **Exhibit "BB"** to this my Affidavit are copies of the following accounts (the "**Babae Accounts**") rendered by CW in connection with matter #41777-0033 (Golnaz Ebrahim Babae Vaarnoos and Mahnaz Ebrahim Babae) which cover legal services, disbursements and taxes from February 29, 2016 to January 31, 2019:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|------------|---------------|----------|--------------------|
| 1998129 | April 1, 2016 | \$488.00 | \$181.55 | \$61.75 | \$731.30 |
| 1999829 | May 1, 2016 | \$370.00 | \$124.45 | \$46.62 | \$541.07 |
| 2001891 | June 1, 2016 | \$415.50 | \$190.66 | \$57.51 | \$663.67 |
| 2009669 | September 1, 2016 | \$212.00 | \$271.48 | \$27.55 | \$511.03 |
| 2030503 | June 1, 2017 | \$196.00 | (\$80.00) | \$23.52 | \$139.52 |
| 2041247 | November 1, 2017 | \$2,386.00 | \$42.60 | \$288.66 | \$2,717.26 |
| 2043468 | December 1, 2017 | \$764.00 | \$45.15 | \$92.05 | \$901.20 |
| 2049582 | February 1, 2018 | \$314.00 | \$43.80 | \$37.98 | \$395.78 |
| 2052996 | April 1, 2018 | \$1,345.00 | \$22.95 | \$161.60 | \$1,529.55 |
| 2057987 | June 1, 2018 | \$1,902.50 | \$86.10 | \$230.73 | \$2,219.33 |
| 2060269 | July 1, 2018 | \$99.00 | \$1,304.55 | \$77.11 | \$1,480.66 |
| 2064301 | September 1, 2018 | \$1,244.50 | \$82.93 | \$149.92 | \$1,477.35 |
| 2066799 | October 1, 2018 | \$1,589.00 | \$5.10 | \$190.94 | \$1,785.04 |
| 2069065 | November 1, 2018 | \$2,045.00 | \$282.55 | \$254.23 | \$2,581.78 |
| 2073120 | December 1, 2018 | \$3,782.50 | \$480.25 | \$477.92 | \$4,740.67 |
| 2075435 | January 1, 2019 | \$2,626.00 | \$584.25 | \$340.33 | \$3,550.58 |
| 2077884 | February 1, 2019 | \$105.00 | \$209.25 | \$22.71 | \$336.96 |
| TOTAL | | | | | \$26,302.75 |

128. The Babae Accounts are in the amount of \$22,415.21 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|------------------|-------|---------------|--------------------------|
| Katie Mak | 0.50 | \$300-\$400 | no discount |
| Lucya Kowalewski | 0.20 | \$300-\$395 | no discount |
| James R. Schmidt | 0.50 | \$545-\$560 | no discount |
| Bill Holder | 0.60 | \$550 | no discount |

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| Alexandra Andrisoi | 7.90 | \$240-\$295 | no discount |
| Sean Tessarolo | 34.50 | \$260-\$350 | no discount |
| Brendan Morley | 0.30 | \$370 | no discount |
| Gordon Behan | 0.10 | \$340 | no discount |
| Articling Students | 9.40 | \$130-\$200 | \$130 until January 2018 No discount thereafter |
| Paralegals | 18.90 | \$100-\$250 | no discount |
| Legal Assistants | 3.80 | \$80 | no discount |

129. The services provided to the Trustee and outlined in the Babae Accounts included the following:

- (a) communicating and negotiating with counsel for Golnaz Ebrahim Babae Vaarnoos and Mahnaz Ebrahim Babae (the "**Babaees**");
- (b) reviewing documentation regarding the Babaees available to the Trustee;
- (c) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by the Babaees (the "**Babae Funds**");
- (d) conducting and reviewing Land Title Office searches;
- (e) reviewing and preparing materials in support of Default Judgment against Babae;
- (f) reviewing and revising Affidavit of non-delivery in support of Default Judgment application;
- (g) preparing letter to Babae requesting payment of Default Judgment;
- (h) registering Certificate of Judgment with the court registry and the Land Title Office;
- (i) drafting Affidavit in support of application for damages assessment;
- (j) reviewing transaction history between Samji Group and Net Winners and considering legal issues for application for damages assessment;
- (k) drafting Notice of Application for assessment of Default Judgment;

- (l) preparing settlement letter;
- (m) preparing response to foreclosure Petition;
- (n) advising Trustee of settlement terms and proceeding in conjunction with foreclosure proceedings;
- (o) coordinating skip tracing services;
- (p) drafting of materials, preparing for and attending Chambers for Application for Substituted Service of Notice of Civil Claim; and
- (q) drafting Notice of Civil Claim regarding fraudulent conveyance.

SERVICES RENDERED FOR 41777-0034 LOLA STOCKBRUGGER

130. Attached hereto and marked as **Exhibit "CC"** to this my Affidavit are copies of the following accounts (the "**Stockbrugger Accounts**") rendered by CW in connection with matter #41777-0034 (Lola Stockbrugger) which cover legal services, disbursements and taxes from January 22, 2016 to June 5, 2017:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-----------------|----------|---------------|---------|-------------------|
| 2001889 | June 1, 2016 | \$120.00 | \$0.45 | \$14.42 | \$134.87 |
| 2012107 | October 1, 2016 | \$360.00 | \$0.90 | \$43.25 | \$404.15 |
| 2018580 | January 1, 2017 | \$60.00 | \$14.95 | \$7.95 | \$82.90 |
| 2023313 | March 1, 2017 | \$210.00 | \$0.00 | \$25.20 | \$235.20 |
| 2024743 | April 1, 2017 | \$180.00 | \$0.00 | \$21.60 | \$201.60 |
| 2027002 | May 1, 2017 | \$568.00 | \$15.75 | \$68.95 | \$652.70 |
| 2030500 | June 1, 2017 | \$0.00 | \$103.00 | \$1.15 | \$104.15 |
| 2033182 | July 1, 2017 | \$50.00 | \$2.52 | \$6.13 | \$58.65 |
| TOTAL | | | | | \$1,874.22 |

131. The Stockbrugger Accounts are in the amount of \$1,874.22 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| Katie Mak | 4.00 | \$300-\$400 | no discount |
| Articling Students | 0.60 | \$130-\$200 | \$130 until January 2018 No discount thereafter |

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|-------------|-------|---------------|--------------------------|
| Paralegals | 2.70 | \$100-\$250 | no discount |

132. The services provided to the Trustee and outlined in the Stockbrugger Accounts included the following:

- (a) communicating and negotiating with Lola Stockbrugger ("**Stockbrugger**") and/or counsel for same;
- (b) reviewing documentation regarding Stockbrugger available to the Trustee;
- (c) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by Stockbrugger (the "**Stockbrugger Funds**");
- (d) working with the Forensic Accountant regarding the documentation supporting the transactions to and from the Debtors' accounts with respect to Stockbrugger Funds;
- (e) drafting of Notice of Intention to Proceed and corresponding letter, and coordinating filing and service of same;
- (f) reviewing and considering settlement offer and transfer of settlement funds; and
- (g) preparing of Consent Dismissal Order, Requisition and coordinating filing of same.

SERVICES RENDERED FOR 41777-0035 NAZLIN JINNY JIWA, SAYED JIWA AND SUNIL THAKER

133. Attached hereto and marked as **Exhibit "DD"** to this my Affidavit are copies of the following accounts (the "**Jiwa Accounts**") rendered by CW in connection with matter #41777-0035 (Nazlin Jinny Jiwa, Sayed Jiwa and Sunil Thaker) which cover legal services, disbursements and taxes from February 10, 2016 to August 9, 2018:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|---------------|------------|---------------|----------|------------|
| 1997269 | March 1, 2016 | \$2,977.00 | \$20.40 | \$357.79 | \$3,355.19 |
| 1998136 | April 1, 2016 | \$1,343.00 | \$239.60 | \$163.14 | \$1,745.74 |
| 1999831 | May 1, 2016 | \$242.00 | \$0.90 | \$29.09 | \$271.99 |

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|------------|---------------|----------|--------------------|
| 2001886 | June 1, 2016 | \$338.50 | \$318.40 | \$56.55 | \$713.45 |
| 2005631 | July 1, 2016 | \$104.00 | \$3.30 | \$12.65 | \$119.95 |
| 2007210 | August 1, 2016 | \$1,509.50 | \$245.90 | \$191.62 | \$1,947.02 |
| 2009668 | September 1, 2016 | \$1,203.00 | \$1.20 | \$144.42 | \$1,348.62 |
| 2012077 | October 1, 2016 | \$288.50 | \$5.25 | \$34.89 | \$328.64 |
| 2014363 | November 1, 2016 | \$1,732.00 | \$4.65 | \$208.11 | \$1,944.76 |
| 2017376 | December 1, 2016 | \$1,058.00 | \$14.40 | \$127.68 | \$1,200.08 |
| 2018565 | January 1, 2017 | \$104.00 | \$0.15 | \$12.49 | \$116.64 |
| 2021175 | February 1, 2017 | \$252.50 | \$0.00 | \$30.31 | \$282.81 |
| 2023303 | March 1, 2017 | \$584.50 | \$194.90 | \$77.55 | \$856.95 |
| 2024742 | April 1, 2017 | \$1,036.00 | \$13.80 | \$125.05 | \$1,174.85 |
| 2027004 | May 1, 2017 | \$2,540.00 | \$11.25 | \$305.36 | \$2,856.61 |
| 2030496 | June 1, 2017 | \$784.00 | \$0.00 | \$94.08 | \$878.08 |
| 2033183 | July 1, 2017 | \$660.00 | \$0.15 | \$79.21 | \$739.36 |
| 2034968 | August 1, 2017 | \$448.00 | \$0.00 | \$53.76 | \$501.76 |
| 2038650 | October 1, 2017 | \$952.00 | \$7.95 | \$114.64 | \$1,074.59 |
| 2043462 | December 1, 2017 | \$476.00 | \$3.90 | \$57.32 | \$537.22 |
| 2046241 | January 1, 2018 | \$404.00 | \$16.40 | \$49.30 | \$469.70 |
| 2049589 | February 1, 2018 | \$1,778.00 | \$3.45 | \$213.53 | \$1,994.98 |
| 2053000 | April 1, 2018 | \$1,299.00 | \$36.20 | \$157.69 | \$1,492.89 |
| 2054911 | May 1, 2018 | \$236.00 | \$0.00 | \$28.32 | \$264.32 |
| 2057986 | June 1, 2018 | \$350.50 | \$2.25 | \$42.18 | \$394.93 |
| 2060270 | July 1, 2018 | \$653.00 | \$4.65 | \$78.59 | \$736.24 |
| 2062638 | August 1, 2018 | \$360.00 | \$0.45 | \$43.22 | \$403.67 |
| 2064300 | September 1, 2018 | \$366.00 | \$106.70 | \$45.26 | \$517.96 |
| TOTAL | | | | | \$28,269.00 |

134. The Jiwa Accounts are in the amount of \$28,269.00 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| Christopher Ramsay | 1.8 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |
| Katie Mak | 3.00 | \$300-\$400 | no discount |

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--------------------------|
| James R. Schmidt | 8.80 | \$545-\$560 | no discount |
| Alexandra Andrisoi | 55.10 | \$240-\$295 | no discount |
| Paralegals | 16.50 | \$100-\$250 | no discount |
| Legal Assistants | 6.90 | \$80 | no discount |

135. The services provided to the Trustee and outlined in the Jiwa Accounts included the following:

- (a) reviewing documentation regarding Nazlin Jinny Jiwa, Sayed Jiwa and Sunil Thaker (the “**Jiwas**”) available to the Trustee;
- (b) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by the Jiwas (the “**Jiwa Funds**”);
- (c) working with the Forensic Accountant regarding the documentation supporting the transactions to and from the Debtors’ accounts with respect to Jiwa Funds;
- (d) reviewing transactions associated with Jiwa and Thacker investor group;
- (e) drafting Notice of Civil Claim including reviewing spreadsheet of transactions prepared by the Forensic Accountant;
- (f) drafting, revising and filing Notice of Civil Claim;
- (g) drafting, revising and filing Amended Notice of Civil Claim;
- (h) conducting legal research on service outside of jurisdiction;
- (i) reviewing, considering and finalizing settlement offer;
- (j) conducting and reviewing Land Title Office searches;
- (k) reviewing and considering documents for production to opposing counsel;
- (l) considering and preparing response to demand for particulars from Jiwas; and
- (m) preparing, revising and filing Consent to Judgements and Requisition.

SERVICES RENDERED FOR 41777-0037 NATASHA SAMJI

136. Attached hereto and marked as **Exhibit “EE”** to this my Affidavit are copies of the following accounts (the **“Natasha Accounts”**) rendered by CW in connection with matter #41777-0037 (Natasha Samji) which cover legal services, disbursements and taxes from July 22, 2016 to July 17, 2018:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|----------|---------------|---------|-------------------|
| 2009667 | September 1, 2016 | \$270.00 | \$30.00 | \$36.00 | \$336.00 |
| 2012073 | October 1, 2016 | \$90.00 | \$94.75 | \$15.54 | \$200.29 |
| 2018567 | January 1, 2017 | \$0.00 | \$130.00 | \$6.50 | \$136.50 |
| 2023301 | March 1, 2017 | \$548.00 | \$4.50 | \$65.99 | \$618.49 |
| 2024730 | April 1, 2017 | \$186.00 | \$226.15 | \$23.63 | \$435.78 |
| 2027005 | May 1, 2017 | \$206.00 | \$0.00 | \$24.72 | \$230.72 |
| 2038654 | October 1, 2017 | \$86.00 | \$0.30 | \$10.34 | \$96.64 |
| 2043461 | December 1, 2017 | \$376.00 | \$107.05 | \$46.47 | \$529.52 |
| 2046238 | January 1, 2018 | \$0.00 | \$490.00 | \$24.50 | \$514.50 |
| 2062639 | August 1, 2018 | \$264.00 | \$0.00 | \$31.68 | \$295.68 |
| TOTAL | | | | | \$3,394.12 |

137. The Natasha Accounts are in the amount of \$3,394.12 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--------------------------|
| Katie Mak | 3.90 | \$300-\$400 | no discount |
| James R. Schmidt | 0.70 | \$545-\$560 | no discount |
| Alexandra Andrisoi | 0.30 | \$240-\$295 | no discount |
| Paralegals | 2.10 | \$100-\$250 | no discount |
| Legal Assistants | 1.40 | \$80 | no discount |

138. The services provided to the Trustee and outlined in the Natasha Accounts included the following:

- (a) reviewing documentation regarding Natasha Samji (**“Samji”**) available to the Trustee;

- (b) drafting Notice of Civil Claim;
- (c) coordinating skip tracing services;
- (d) conducting and reviewing Land Title Office searches;
- (e) considering service issues with respect to Notice of Civil Claim;
- (f) reviewing and preparing application materials for extension of time to file Notice of Civil Claim; and
- (g) preparing materials for discontinuation of action.

SERVICES RENDERED FOR 41777-0038 RAJESH GAJJAR

139. Attached hereto and marked as **Exhibit "FF"** to this my Affidavit are copies of the following accounts (the "**Gajjar Accounts**") rendered by CW in connection with matter #41777-0038 (Rajesh Gajjar) which cover legal services, disbursements and taxes from July 22, 2016 to April 30, 2019:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|------------|---------------|----------|------------|
| 2009665 | September 1, 2016 | \$240.00 | \$30.45 | \$32.42 | \$302.87 |
| 2021776 | February 1, 2017 | \$3,169.00 | \$9.60 | \$380.76 | \$3,559.36 |
| 2023300 | March 1, 2017 | \$1,396.00 | \$10.35 | \$168.04 | \$1,574.39 |
| 2024727 | April 1, 2017 | \$1,122.00 | \$420.93 | \$140.11 | \$1,683.04 |
| 2027006 | May 1, 2017 | \$292.00 | \$170.20 | \$43.55 | \$505.75 |
| 2030488 | June 1, 2017 | \$510.00 | \$2.25 | \$61.31 | \$573.56 |
| 2033196 | July 1, 2017 | \$552.00 | \$1.65 | \$66.32 | \$619.97 |
| 2034963 | August 1, 2017 | \$3,328.00 | \$4.05 | \$399.68 | \$3,731.73 |
| 2037058 | September 1, 2017 | \$1,722.00 | \$3.30 | \$206.81 | \$1,932.11 |
| 2038662 | October 1, 2017 | \$160.00 | \$9.19 | \$19.66 | \$188.85 |
| 2041243 | November 1, 2017 | \$400.00 | \$1.20 | \$48.06 | \$449.26 |
| 2043459 | December 1, 2017 | \$2,720.00 | \$393.33 | \$332.07 | \$3,445.40 |
| 2049585 | February 1, 2018 | \$1,770.00 | \$65.84 | \$215.69 | \$2,051.53 |
| 2050751 | March 1, 2018 | \$1,170.00 | \$175.50 | \$149.18 | \$1,494.68 |
| 2053002 | April 1, 2018 | \$5,092.00 | \$47.85 | \$612.96 | \$5,752.81 |
| 2054913 | May 1, 2018 | \$203.50 | \$569.95 | \$52.93 | \$826.38 |
| 2057985 | June 1, 2018 | \$1,358.00 | \$0.15 | \$162.97 | \$1,521.12 |
| 2060273 | July 1, 2018 | \$190.00 | \$0.00 | \$22.80 | \$212.80 |
| 2069060 | November 1, 2018 | \$6,734.00 | \$10.65 | \$808.61 | \$7,553.26 |

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|------------------|-------------|---------------|------------|--------------------|
| 2073116 | December 1, 2018 | \$4,338.00 | \$105.65 | \$525.84 | \$4,969.49 |
| 2075433 | January 1, 2019 | \$2,432.00 | \$3.75 | \$292.03 | \$2,727.78 |
| 2077886 | February 1, 2019 | \$1,342.00 | \$9.85 | \$161.53 | \$1,513.38 |
| 2079798 | March 1, 2019 | \$13,764.00 | \$392.51 | \$1,666.48 | \$15,822.99 |
| 2082258 | April 1, 2019 | \$5,956.00 | \$10.35 | \$715.24 | \$6,681.59 |
| 2084832 | May 1, 2019 | \$12,072.00 | \$387.59 | \$1,468.02 | \$13,927.61 |
| TOTAL | | | | | \$83,621.71 |

140. The Gajjar Accounts are in the amount of \$42,948.36 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|--------|---------------|--|
| Christopher Ramsay | 5.50 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |
| Katie Mak | 135.80 | \$300-\$400 | no discount |
| James R. Schmidt | 2.90 | \$545-\$560 | no discount |
| Lucya Kowalewski | 1.00 | \$300-\$395 | no discount |
| Articling Students | 0.50 | \$130-\$200 | \$130 until January 2018 No discount thereafter |
| Paralegals | 109.80 | \$100-\$250 | no discount |

141. The services provided to the Trustee and outlined in the Gajjar Accounts included the following:

- (a) reviewing documentation regarding Rajesh Gajjar ("Gajjar") available to the Trustee;
- (b) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by Gajjar (the "Gajjar Funds");
- (c) working with the forensic accountant regarding the documentation supporting the transactions to and from the Debtors' accounts with respect to Gajjar Funds;

- (d) reviewing transactions associated with Gajjar;
- (e) drafting Notice of Civil Claim;
- (f) considering legal basis with respect to non-arm's length transfers and preferences under the BIA;
- (g) preparing Certificate of Pending Litigation;
- (h) drafting and reviewing Response to Civil Claim;
- (i) reviewing List of Documents and documents provided by the Society of Notary Public;
- (j) considering disclosure issues of privileged documents;
- (k) preparing application materials for failure to produce documents as requested and to strike the Response to Civil Claim;
- (l) attending to scheduling Examination for Discovery and trial dates;
- (m) preparing, reviewing and filing Requisition adjourning application regarding production of List of Documents;
- (n) reviewing pleadings and documents, preparing materials for and attending examination of discovery of Gajjar;
- (o) conducting and reviewing Land Title Office searches;
- (p) drafting Notice to Admit;
- (q) preparing s. 164 demand regarding purchase of Sechelt property;
- (r) preparing for and attending Examinations for Discovery of Trustee;
- (s) preparing Summary Trial Application and supporting Affidavits;
- (t) negotiating terms of adjournment of Summary Trial Application;
- (u) preparing for and attending mediation; and
- (v) negotiating terms of settlement and preparing settlement agreement.

SERVICES RENDERED FOR 41777-0039 ADIL KESHVANI

142. Attached hereto and marked as **Exhibit "GG"** to this my Affidavit are copies of the following accounts (the "**Adil Accounts**") rendered by CW in connection with matter #41777-0039 (Adil Keshvani) which cover legal services, disbursements and taxes from March 17, 2017 to October 2, 2018:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|-------------|---------------|------------|--------------------|
| 2024725 | April 1, 2017 | \$112.00 | \$30.00 | \$17.04 | \$159.04 |
| 2030481 | June 1, 2017 | \$320.00 | \$0.90 | \$38.45 | \$359.35 |
| 2037055 | September 1, 2017 | \$4,234.00 | \$30.75 | \$509.62 | \$4,774.37 |
| 2038574 | October 1, 2017 | \$168.00 | \$467.51 | \$43.24 | \$678.75 |
| 2041240 | November 1, 2017 | \$732.00 | \$767.25 | \$126.21 | \$1,625.46 |
| 2043456 | December 1, 2017 | \$2,148.00 | \$28.16 | \$259.17 | \$2,435.33 |
| 2046235 | January 1, 2018 | \$32.00 | \$223.90 | \$5.04 | \$260.94 |
| 2049590 | February 1, 2018 | \$1,480.00 | \$0.60 | \$177.63 | \$1,658.23 |
| 2050748 | March 1, 2018 | \$1,169.00 | \$15.60 | \$141.06 | \$1,325.66 |
| 2053004 | April 1, 2018 | \$450.50 | \$52.95 | \$56.72 | \$560.17 |
| 2057984 | June 1, 2018 | \$543.50 | \$19.80 | \$66.22 | \$629.52 |
| 2060275 | July 1, 2018 | \$3,696.50 | \$26.85 | \$444.93 | \$4,168.28 |
| 2062641 | August 1, 2018 | \$14,719.00 | \$51.00 | \$1,768.83 | \$16,538.83 |
| 2064296 | September 1, 2018 | \$8,446.00 | \$153.05 | \$1,021.17 | \$9,620.22 |
| 2069057 | November 1, 2018 | \$36.00 | \$287.70 | \$18.71 | \$342.41 |
| TOTAL | | | | | \$45,136.56 |

143. The Adil Accounts are in the amount of \$45,136.56 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| Christopher Ramsay | 7.40 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |
| Katie Mak | 34.50 | \$300-\$400 | no discount |
| James R. Schmidt | 0.80 | \$545-\$560 | no discount |

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| Lucya Kowalewski | 8.50 | \$300-\$395 | no discount |
| Alexandra Andrisoi | 26.50 | \$240-\$295 | no discount |
| Articling Students | 2.80 | \$130-\$200 | \$130 until January 2018 No discount thereafter |
| Paralegals | 49.50 | \$100-\$250 | no discount |
| Legal Assistants | 7.60 | \$80 | no discount |

144. The services provided to the Trustee and outlined in the Adil Accounts included the following:

- (a) reviewing documentation regarding Adil Keshvani (“Adil”) available to the Trustee;
- (b) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by Adil (the “Adil Funds”);
- (c) working with the Forensic Accountant regarding the documentation supporting the transactions to and from the Debtors’ accounts with respect to the Adil Funds;
- (d) reviewing transactions associated with Adil and the Keshvani investor group;
- (e) attending to scheduling of Examination for Discovery;
- (f) reviewing documents, preparing for and attending Examination for Discovery of Adil including travel to and from Calgary;
- (g) coordinating preparation of expert report;
- (h) considering preparation of Notice of Application for production of documents;
- (i) drafting and reviewing Agreed Statement of Facts;
- (j) reviewing and considering Response to Notice to Admit of Adil;
- (k) attending to scheduling of mediation, Trial Management Conference and trial;

- (l) reviewing documents, preparing materials for and attending mediation;
- (m) preparing RBC Affidavit of evidence;
- (n) reviewing and considering defendants' Trial Brief;
- (o) preparing and revising Mediation Brief;
- (p) preparing Response to Notice of Application of Adil regarding adjournment of trial and supporting Affidavit;
- (q) preparing and filing Requisition adjourning the Trial Management Conference and Trial;
- (r) reviewing Land Title Office searches; and
- (s) reviewing and preparing Affidavit regarding consent order to have all Keshvani matters tried together.

SERVICES RENDERED FOR 41777-0040 FAIYAZ KESHVANI

145. Attached hereto and marked as **Exhibit "HH"** to this my Affidavit are copies of the following accounts (the "**Faiyaz Accounts**") rendered by CW in connection with matter #41777-0040 (Faiyaz Keshvani) which cover legal services, disbursements and taxes from March 27, 2017 to October 2, 2018:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|------------|---------------|----------|-------------------|
| 2024723 | April 1, 2017 | \$56.00 | \$30.00 | \$10.32 | \$96.32 |
| 2030474 | June 1, 2017 | \$292.00 | \$1.20 | \$35.10 | \$328.30 |
| 2037054 | September 1, 2017 | \$2,174.00 | \$18.00 | \$261.78 | \$2,453.78 |
| 2038576 | October 1, 2017 | \$160.00 | \$690.20 | \$43.41 | \$893.61 |
| 2041236 | November 1, 2017 | \$736.00 | \$438.60 | \$110.25 | \$1,284.85 |
| 2050743 | March 1, 2018 | \$992.50 | \$15.00 | \$119.86 | \$1,127.36 |
| 2053005 | April 1, 2018 | \$48.00 | \$5.25 | \$6.02 | \$59.27 |
| 2057983 | June 1, 2018 | \$170.00 | \$232.30 | \$22.02 | \$424.32 |
| 2060278 | July 1, 2018 | \$1,062.00 | \$1.05 | \$127.49 | \$1,190.54 |
| 2062643 | August 1, 2018 | \$183.00 | \$18.60 | \$22.89 | \$224.49 |
| 2064295 | September 1, 2018 | \$941.00 | \$27.90 | \$114.32 | \$1,083.22 |
| 2073113 | December 1, 2018 | \$36.00 | \$7.43 | \$4.67 | \$48.10 |
| TOTAL | | | | | \$9,214.16 |

146. The Faiyaz Accounts are in the amount of \$9,214.16 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| Christopher Ramsay | 1.20 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |
| Katie Mak | 1.00 | \$300-\$400 | no discount |
| James R. Schmidt | 0.70 | \$545-\$560 | no discount |
| Lucya Kowalewski | 2.20 | \$300-\$395 | no discount |
| Alexandra Andrisoi | 11.80 | \$240-\$295 | no discount |
| Paralegals | 4.70 | \$100-\$250 | no discount |
| Legal Assistants | 5.20 | \$80 | no discount |

147. The services provided to the Trustee and outlined in the Faiyaz Accounts included the following:

- (a) reviewing documentation regarding Faiyaz Keshvani ("Faiyaz") available to the Trustee;
- (b) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by Faiyaz (the "Faiyaz Funds");
- (c) working with the Forensic Accountant regarding the documentation supporting the transactions to and from the Debtors' accounts with respect to Faiyaz Funds;
- (d) reviewing transactions associated with Faiyaz;
- (e) attending to scheduling Examination for Discovery, mediation and trial dates;
- (f) preparing Notice of Appointment to Examine;
- (g) preparing material and attending Examination for Discovery of Faiyaz;
- (h) reviewing and considering documentary discovery requests;

- (i) preparing and revising Consent Order to have matters related to the Keshvanis heard jointly; and
- (j) preparing Statement of Agreed Facts.

SERVICES RENDERED FOR 41777-0041 ALNOOR AND NAZIRA JESANI

148. Attached hereto and marked as **Exhibit "II"** to this my Affidavit are copies of the following accounts (the "**Alnoor Accounts**") rendered by CW in connection with matter #41777-0041 (Alnoor and Nazira Jesani) which cover legal services, disbursements and taxes from March 29, 2017 to October 22, 2018:

| INVOICE NUMBER | INVOICE DATE | FEES | DISBURSEMENTS | TAXES | TOTAL |
|----------------|-------------------|------------|---------------|----------|-------------------|
| 2024722 | April 1, 2017 | \$170.00 | \$30.00 | \$24.00 | \$224.00 |
| 2027007 | May 1, 2017 | \$300.00 | \$0.00 | \$36.00 | \$336.00 |
| 2033197 | July 1, 2017 | \$110.00 | \$20.85 | \$14.24 | \$145.09 |
| 2034949 | August 1, 2017 | \$1,440.00 | \$69.20 | \$173.90 | \$1,683.10 |
| 2037051 | September 1, 2017 | \$800.00 | \$231.70 | \$97.59 | \$1,129.29 |
| 2038580 | October 1, 2017 | \$0.00 | \$149.75 | \$7.49 | \$157.24 |
| 2043453 | December 1, 2017 | \$60.00 | \$0.45 | \$7.22 | \$67.67 |
| 2053007 | April 1, 2018 | \$114.00 | \$2.10 | \$13.79 | \$129.89 |
| 2054909 | May 1, 2018 | \$733.50 | \$0.00 | \$88.03 | \$821.53 |
| 2057979 | June 1, 2018 | \$817.00 | \$4.65 | \$98.27 | \$919.92 |
| 2060281 | July 1, 2018 | \$245.50 | \$0.75 | \$29.51 | \$275.76 |
| 2064294 | September 1, 2018 | \$419.00 | \$0.30 | \$50.30 | \$469.60 |
| 2073110 | December 1, 2018 | \$59.00 | \$0.00 | \$7.08 | \$66.08 |
| TOTAL | | | | | \$6,425.17 |

149. The Alnoor and Nazira Accounts are in the amount of \$6,425.17 and include the disbursements set out therein and the following fees charged by the following timekeepers:

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|--------------------|-------|---------------|--|
| Christopher Ramsay | 0.60 | \$500 - \$600 | \$500 until October 2016 \$560 until January 2018 No discount thereafter |

| TIME KEEPER | HOURS | RATE PER HOUR | DISCOUNTED RATE PER HOUR |
|------------------|-------|---------------|--------------------------|
| Katie Mak | 7.20 | \$300-\$400 | no discount |
| James R. Schmidt | 1.00 | \$545-\$560 | no discount |
| Sean Tessarolo | 3.20 | \$260-\$350 | no discount |
| Paralegals | 8.20 | \$100-\$250 | no discount |

150. The services provided to the Trustee and outlined in the Alnoor and Nazira Accounts included the following:

- (a) reviewing documentation regarding Alnoor and Nazira Jesani ("**Alnoor**") available to the Trustee;
- (b) working with the Trustee and considering the analysis of the Forensic Accountant regarding Funds received directly or indirectly by Alnoor (the "**Alnoor Funds**");
- (c) working with the Forensic Accountant regarding the documentation supporting the transactions to and from the Debtors' accounts with respect to Alnoor Funds;
- (d) reviewing transactions associated with the Alnoor investor group;
- (e) drafting Notice of Civil Claim;
- (f) considering legal issues and evidence;
- (g) reviewing and considering pleadings;
- (h) preparing and reviewing List of Documents; and
- (i) corresponding with opposing counsel regarding response to document request.

SUMMARY

151. The fees set out in the CW Accounts were calculated on the basis of the hours spent by CW personnel, multiplied by the applicable hourly rates charged by CW. To the best of my knowledge, information and belief, the discounted hourly rates are less than those charged by other law firms similar to CW and for work of a similar nature by lawyers with a similar level of expertise.


152. Accordingly, CW is seeking approval of its fees in the amount of \$1,376,796.00.

153. To the best of my knowledge, information and belief, the information contained in the CW Accounts as to:

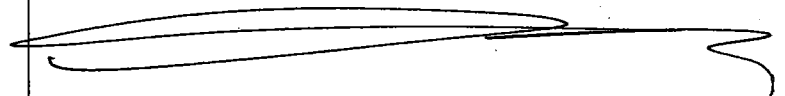
- (a) the number of hours worked;
- (b) the nature of work performed;
- (c) the identity of the individuals who performed the work; and
- (d) the rates charged for the work performed,

is true and correct in all respects, and the amount and nature of the work done is reasonable in the circumstances, given the exceptional complexity of this matter as outlined above.

SWORN (OR AFFIRMED) BEFORE ME at
Vancouver, BC, on 9 / August / 2019.



A Commissioner for taking Affidavits within
British Columbia



CHRISTOPHER J. RAMSAY

KATIE G. MAK
Barrister & Solicitor
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