



This is Affidavit #1 of Ryan M. Laity in this proceeding and was made on December 14, 2020.

No. H200268
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

HONG LIU and MENG RUI LI a.k.a. MENGRUI LI

PETITIONERS

AND:

EAGLE Q PARTNERS INC.,
JIAN JIN,
ZHIHONG CHU a.k.a. ZHI HONG CHU,
TIE FENG FU, and
HANYUM DEVELOPMENT CORP.

RESPONDENTS

AFFIDAVIT

I, Ryan M. Laity, Lawyer, of 1200 – 200 Burrard Street, Vancouver, British Columbia, MAKE OATH AND SAY AS FOLLOWS:

1. I am an associate at Borden Ladner Gervais LLP (“BLG”), counsel for FTI Consulting Canada Inc., the court-appointed receiver (in such capacity, the “Receiver”), without security, of all of the assets, undertaking and property of the Respondent Eagle Q Partners Inc. (the “Debtor”) and as such, I have personal knowledge of the facts deposed to in this Affidavit, except where stated to be based on information and belief, in which case, I believe that such information is true and accurate.
2. Attached and marked as Exhibit “A” to this Affidavit are true copies of the accounts of BLG in this matter (collectively, the “Accounts”), as follows:

Invoice Number	Invoice Date	Amount
697850246	June 8, 2020	\$ 1,630.72
697860980	July 8, 2020	\$ 3,875.14

697872877	August 12, 2020	\$ 2,154.88
697913851	December 7, 2020	\$ 9,729.44
TOTAL:		\$ 17,390.18

3. As detailed in the Accounts, from May 19, 2020 to November 30, 2020, the invoiced fees and disbursements incurred by BLG, inclusive of taxes, amounted to a total of \$17,390.18, which consists of \$15,518.50 in fees, \$9.00 in disbursements, \$776.38 in GST, and \$1,086.30 in PST.
4. Attached and marked as **Exhibit "B"** to this Affidavit is a summary of the incurred fees, calculated on the basis of the hours spent by BLG professionals in relation to the Accounts, which amounts to 46.1 hours, multiplied by the applicable standard hourly rates charged by BLG in its insolvency practice. As set out in the Accounts, certain discounts were applied to the invoiced fees.
5. In the context of these proceedings, there were a number of matters required of BLG, the particulars of which are set out in the detailed narratives provided with the Accounts.
6. To the best of my knowledge, information and belief, the information contained in the Accounts as to the number of hours worked, the nature of the work performed, the identity of the individuals who performed the work and the rates charged for the work performed is true and correct in all respects.
7. The matters required of our firm are set out in the attached accounts and included:
 - (a) various communications with the Receiver, the Petitioners' counsel and other stakeholders, regarding options, strategy, and receivership issues;
 - (b) various communications with the Receiver, the Petitioners' counsel, the Debtor's counsel, and representatives of Westside School with respect to recovery of amounts owing to the Debtor, including attending meetings in respect of same; and
 - (c) assisting the Receiver in respect of the transaction in respect of amounts owed by Westside School to the Debtor, including the form of agreement and application to approve the transaction.
8. The majority of the work on this file was completed by Lisa Hiebert. I was involved, along with other lawyers and a paralegal, as required and appropriate in the circumstances. The other lawyers who

assisted are MaryGrace Johnstone and Randall Lau. We were also assisted by our paralegal, Charlene Ang.

Insolvency and Restructuring

9. During and since the relevant time period, each of Ms. Hiebert, Ms. Johnstone, Mr. Lau and I have practiced in the area of insolvency law.
10. During the period over which the Accounts were issued, my hourly rate was \$465. I was called to the bar in British Columbia in 2014. During and since the relevant time period, I have practiced in insolvency and restructuring law, as well as lending and finance law.
11. During the period over which the Accounts were issued, Ms. Hiebert's hourly rate was \$520. She was called to the bar in Alberta in 2007 and in British Columbia in 2009. During and since the relevant time period, she has practiced in insolvency and restructuring law, with a focus on commercial restructuring and receivership matters.
12. During the period over which the Accounts were issued, Ms. Johnstone's hourly rate was \$335. Ms. Johnstone was called to the bar in British Columbia in 2020. During and since the relevant time period, Ms. Johnstone has practiced in insolvency and restructuring law, as well as lending and finance law.
13. During the period over which the Accounts were issued, Mr. Lau's hourly rate was \$385. Mr. Lau was called to the bar in Ontario in 2018 and British Columbia in 2019. During and since the relevant time period, Mr. Lau has practiced in insolvency and restructuring law, as well as lending and finance law.

Paralegal

14. During the period over which the Accounts were issued, Ms. Ang's hourly rate was \$195. Ms. Ang is a paralegal and has assisted me with required corporate searches.

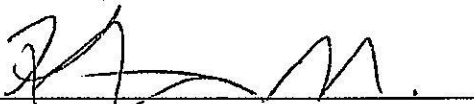
The Fees are Reasonable

15. I have reviewed the Accounts and confirm that, to the best of my knowledge, information and belief, they accurately reflect the work that was done in connection with this matter, and that all the time spent was reasonable and necessary. I have also considered the delegation of work within the firm and note that where appropriate, particularly when it would be practicable and efficient to do so, the

work was carried out by lawyers with lower hourly rates or delegated to paralegals or articling students.

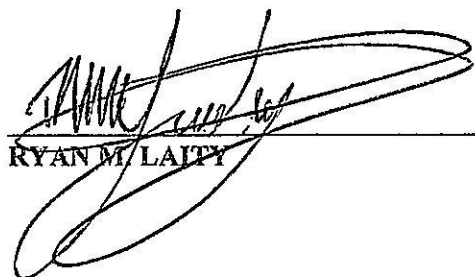
16. I have reviewed the Accounts, and based on my experience as a lawyer practicing in the area of insolvency law and familiar with this matter, I verily believe that:
- (a) the professional fees and disbursements have been properly incurred and are fair and reasonable in the circumstances;
 - (b) as noted above, the work was delegated to the appropriate professionals with the appropriate seniority and hourly rates;
 - (c) the Accounts were provided to the Receiver when rendered, and all have been approved by the Receiver; and
 - (d) the services were provided by BLG in a prudent and economical manner.
17. BLG assesses the hourly rates of its professionals annually, and based on this annual review and on my experience in insolvency matters, I believe that the hourly rates for each of the timekeepers and BLG professionals over the Accounts period are consistent with those charged by similar firms in the Vancouver markets for lawyers in insolvency and restructuring with similar levels of experience and expertise, and with the capacity to handle a file of similar size and complexity.
18. I swear this Affidavit expressly for the purposes of the Receiver's application to approve its accounts and the BLG Accounts, and for no other purpose. In particular, nothing herein is a waiver of solicitor-client privilege by the Receiver.

SWORN BEFORE ME at the City of Vancouver)
in the Province of British Columbia, this 14th day)
of December, 2020.)



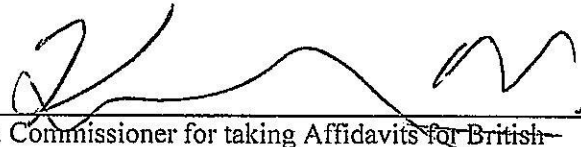
A Commissioner for taking Affidavits)
for British Columbia)

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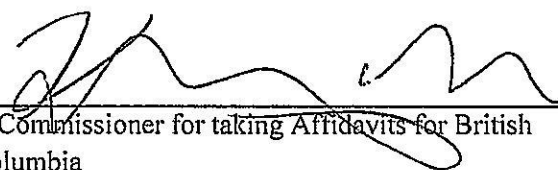
RYAN M. LAITY

This is **Exhibit "A"** referred to in
Affidavit #1 of Ryan Laity made before
me on December 4, 2020.

A handwritten signature in black ink, consisting of a large, stylized initial 'R' followed by a series of loops and a final flourish.

A Commissioner for taking Affidavits for British
Columbia

This is **Exhibit "B"** referred to in
Affidavit #1 of Ryan Laity made before
me on December 14, 2020.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, positioned above a horizontal line.

A Commissioner for taking Affidavits for British
Columbia

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RESPONDENTS

AFFIDAVIT #1 OF RYAN LAITY

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