

This is the 1st affidavit
of Bart Watkins in this case and
was made on the 29th day of JANUARY, 2025

No. B-240477
VANCOUVER REGISTRY

**IN THE SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY AND INSOLVENCY**

Between:

STELLEX POWER LINE OPCO LLC AND 1501841 B.C. LTD.

PETITIONERS

And:

ROKSTAD HOLDINGS CORPORATION, ROKSTAD POWER (2018) LTD.,
ROKSTAD POWER CONSTRUCTION SERVICES LTD., ROKSTAD POWER
TRANSMISSION SERVICES LTD., ROKSTAD POWER (PRAIRIES) LTD.,
GOLDEN EATS PAINTING & SANDBLASTING (2018) LTD., PLOWE POWER
SYSTEMS (2018) LTD., ROKSTAD POWER (EAST), INC., ROKSTAD POWER
INC. AND ROK AIR, LLC

RESPONDENTS

AFFIDAVIT

I, Bart Watkins, of the State of Alabama, United States of America, SWEAR THAT:

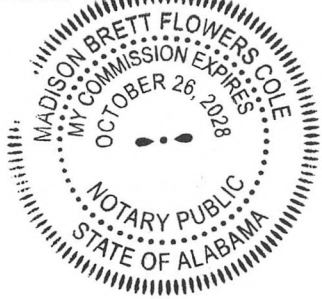
1. I have been an employee of Global Rental Co., Inc. ("**Global Rental**"), a corporation organized under the laws of the State of Alabama, for twenty-three (23) years. I am currently employed as Credit Manager and as such I have personal knowledge of the facts and matters hereinafter deposed to, save and except where they are stated to be on information and belief, in which case I verily believe them to be true. Where necessary, I have reviewed the books and records maintained by Global Rental in the ordinary course of business.
2. As Credit Manager of Global Rental, I am familiar with the business relationship between Global Rental and Rokstad Power (2018) Ltd. ("**Power (2018)**").
3. On or about October 18, 2022, Global Rental and Power (2018) entered into that certain Equipment Rental Agreement (the "**Master Rental Agreement**"), pursuant to which Global Rental agreed to lease certain equipment to Power (2018).
4. In connection therewith, Global Rental and Power (2018) entered into forty-three (43) separate rental acknowledgements (the "**Rental Acknowledgements**", together with the Master Rental Agreement, the "**Rental Documents**"). Power (2018) surrendered unit 082-092854 associated with Rental Acknowledgement No. 1338865 on January 14, 2025,

leaving forty-two (42) vehicles under rental with Global Rental pursuant to the Rental Documents.

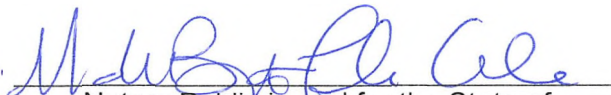
- 5. As of January 28, 2025, Power (2018)'s unpaid balance that must be paid to bring Power (2018) current under the Rental Documents is \$474,689.17. A list of the specific invoices that remain outstanding and unpaid under the Rental Documents is attached hereto as **Exhibit "A"**.
- 6. Additional amounts continue to accrue under the Rental Documents, and Global Rental reserves the right to seek such additional amounts that accrue on or prior to any closing of an asset purchase agreement approved by the Court in these proceedings as part of cure costs to be paid in order as a condition of the assignment such Rental Documents to any purchaser.

SWORN BEFORE ME at JEFFERSON CO,)
BIRMINGHAM, in the State of Alabama,)
 United States of America, on the 29 day of)
JANUARY, 2025.)
[Signature])
 A Notary Public in and for the State of)
 Alabama)

[Signature]
 BART WATKINS



This is Exhibit "A" referred to in the
1st Affidavit of Bart Watkins, sworn before
me at JEFFERSON CO
BIRMINGHAM, AL on January
29, 2025


Notary Public in and for the State of
Alabama



Rokstad Pre-Petition Bal For Bad Debt Write Off 11-25-24 (003).xls

Inv Num	Inv Date	Unit Num	Billing Period	Chs VIN	Trans Type	Balance Due	Current	Over 30	Over 60	Over 90
30184380	09/27/24	094-78731586	09/26/24 - 10/23/24	3ALKCYFE1NDNB7582	RENTAL	7,938.75		7,938.75		
30185316	10/01/24	094-77597368	09/30/24 - 10/27/24	3ALKCYFE7NDMY1286	RENTAL	12,593.75		12,593.75		
30185317	10/01/24	082-562544	09/30/24 - 10/27/24	3C7WRNFLXPG562544	RENTAL	6,149.75		6,149.75		
30185318	10/01/24	082-562561	09/30/24 - 10/27/24	3C7WRNFLXPG562561	RENTAL	6,149.75		6,149.75		
30185324	10/01/24	037-93506309	09/30/24 - 10/27/24	3ALKCYFE4RDVE6841	RENTAL	16,715.00		16,715.00		
30185332	10/01/24	082-UF9387	09/30/24 - 10/27/24	1FVDG5FE7PHUF9387	RENTAL	5,747.85		5,747.85		
30185334	10/01/24	082-UF9389	09/30/24 - 10/27/24	1FVDG5FE0PHUF9389	RENTAL	5,747.85		5,747.85		
30187174	10/03/24	037-1016499122	10/01/24 - 10/28/24	3ALDCXFC7SDVX3785	RENTAL	9,646.00		9,646.00		
30187236	10/03/24	037-78995374	10/01/24 - 10/28/24	3ALDCXFC8NDNG1726	RENTAL	4,770.00		4,770.00		
30187510	10/04/24	097-49790726	10/03/24 - 10/30/24	3HAWBMMN9KL713191	RENTAL	3,560.21		3,560.21		
30187708	10/04/24	094-63672976	10/03/24 - 10/30/24	1NPCXJEX8LD706580	RENTAL	14,425.00		14,425.00		
30188399	10/08/24	094-90972398	09/30/24 - 10/06/24	1NPCXJEX5RD682134	RENTAL	4,350.00		4,350.00		
30188500	10/08/24	094-85164844	10/07/24 - 11/03/24	1NPCXJEX3PD858269	RENTAL	10,022.50		10,022.50		
30189146	10/09/24	037-88981896	10/07/24 - 11/03/24	1HTKJPVK6NH639021	RENTAL	3,699.75		3,699.75		
30189153	10/09/24	094-90972398	10/04/24 - 10/06/24	1NPCXJEX5RD682134	RENTAL CM	-1,863.98			-1,863.98	
30189183	10/09/24	037-81279024	10/08/24 - 11/04/24	3ALKCYFE3NDNL1679	RENTAL	10,283.75		10,283.75		
30189548	10/10/24	094-53192749	10/09/24 - 11/05/24	1NPSXJEX0KD261911	RENTAL	10,355.00		10,355.00		
30189638	10/10/24	037-93506416	10/09/24 - 11/05/24	3ALKCYFE2SDVJ8322	RENTAL	11,875.00		11,875.00		
30190079	10/11/24	082-562545	10/10/24 - 11/06/24	3C7WRNFL1PG562545	RENTAL	6,149.75		6,149.75		
30190351	10/14/24	037-93506409	10/11/24 - 11/07/24	3ALKCYFE5SDVJ8315	RENTAL	11,875.00		11,875.00		
30190352	10/14/24	037-1018815259	10/10/24 - 11/06/24	3ALKCYFE7SDVN2143	RENTAL	11,875.00		11,875.00		
30190353	10/14/24	037-1018819263	10/09/24 - 11/05/24	3ALKCYFE1SDVN2140	RENTAL	11,875.00		11,875.00		
30190354	10/14/24	037-93506404	10/11/24 - 11/07/24	3ALKCYFE6SDVJ8310	RENTAL	11,875.00		11,875.00		
30190355	10/14/24	094-81437341	10/11/24 - 11/07/24	1FVKCYFE1NHNL1481	RENTAL	8,906.25		8,906.25		
30190464	10/14/24	037-93506405	10/09/24 - 11/05/24	3ALKCYFE8SDVJ8311	RENTAL	11,875.00		11,875.00		
30191970	10/16/24	037-61600037	10/15/24 - 11/11/24	1FVDXFC2LHKW7265	RENTAL	9,540.00		9,540.00		
30192152	10/17/24	037-84438226	10/16/24 - 11/12/24	3ALKCYFE7PDUH4370	RENTAL	10,283.75		10,283.75		
30192615	10/18/24	094-77597449	10/17/24 - 11/13/24	3ALKCYFE9NDMY1273	RENTAL	7,643.98		7,643.98		
30192838	10/18/24	037-1019268727	10/17/24 - 11/13/24	3ALDCXFC7SDVJ4221	RENTAL	7,306.25		7,306.25		
30192993	10/19/24	094-90972398	10/18/24 - 11/14/24	1NPCXJEX5RD682134	RENTAL	10,925.00		10,925.00		
30193094	10/19/24	094-55876123	10/18/24 - 11/14/24	1NPSXJEX0KD616074	RENTAL	10,925.00		10,925.00		
30193100	10/19/24	081-268122	10/18/24 - 11/14/24	1T92C212XNS268122	RENTAL	7,712.50		7,712.50		
30193591	10/22/24	037-67524134	10/17/24 - 11/13/24	3ALDCXFC9MDLB7355	RENTAL	9,646.00		9,646.00		
30193946	10/22/24	037-60026666	10/17/24 - 11/13/24	3HAEEMMN9LL074167	RENTAL	9,540.00		9,540.00		
30194318	10/23/24	081-268236	10/22/24 - 11/18/24	1T92C1723NS268236	RENTAL	5,235.60		5,235.60		
30194319	10/23/24	037-76369000	10/22/24 - 11/18/24	1FVKCYFE7MHMT3120	RENTAL	10,331.25		10,331.25		
30194346	10/23/24	082-039446	10/22/24 - 11/18/24	1FTBF2B69MEC39446	RENTAL	2,256.25		2,256.25		
30194774	10/24/24	037-78359607	10/23/24 - 11/19/24	3ALDCXFC1NDNA6082	RENTAL	3,806.25		3,806.25		
30194848	10/25/24	094-78731586	10/24/24 - 11/20/24	3ALKCYFE1NDNB7582	RENTAL	7,938.75		7,938.75		

Rokstad Pre-Petition Bal For Bad Debt Write Off 11-25-24 (003).xls

Inv Num	Inv Date	Unit Num	Billing Period	Chs VIN	Trans Type	Balance Due	Current	Over 30	Over 60	Over 90
30195283	10/28/24	097-92461216	10/25/24 - 11/21/24	1FVDCXFC1SHVV3994	RENTAL	3,823.75	3,823.75			
30195750	10/29/24	037-93506309	10/28/24 - 11/24/24	3ALKCYFE4RDVE6841	RENTAL	10,925.00	10,925.00			
30195751	10/29/24	097-92461194	10/28/24 - 11/24/24	1FVDCXFC6SHVX3819	RENTAL	3,823.75	3,823.75			
30195752	10/29/24	082-UF9387	10/28/24 - 11/24/24	1FVDG5FE7PHUF9387	RENTAL	3,904.20	3,904.20			
30195755	10/29/24	082-562544	10/28/24 - 11/24/24	3C7WRNFLXPG562544	RENTAL	2,949.75	2,949.75			
30195954	10/29/24	082-562561	10/28/24 - 11/24/24	3C7WRNFLXPG562561	RENTAL	2,949.75	2,949.75			
30196093	10/29/24	082-UF9389	10/28/24 - 11/24/24	1FVDG5FE0PHUF9389	RENTAL	3,904.20	3,904.20			
30196131	10/29/24	097-66049684	10/28/24 - 11/24/24	3HAEEMMN7ML314625	RENTAL	9,646.00	9,646.00			
30196132	10/29/24	094-77597368	10/28/24 - 11/24/24	3ALKCYFE7NDMY1286	RENTAL	8,193.75	8,193.75			
30196580	10/30/24	037-78995374	10/29/24 - 11/25/24	3ALDCXFC8NDNG1726	RENTAL	3,710.00	3,710.00			
30196581	10/30/24	037-1016499122	10/29/24 - 11/25/24	3ALDCXFC7SDVX3785	RENTAL	3,710.00	3,710.00			
30197139	11/01/24	097-49790726	10/31/24 - 11/27/24	3HAWBMMN9KL713191	RENTAL	3,560.21	3,560.21			
30197355	11/01/24	094-63672976	10/31/24 - 11/27/24	1NPCXJEX8LD706580	RENTAL	10,925.00	10,925.00			
30199027	11/06/24	094-85164844	11/04/24 - 12/01/24	1NPCXJEX3PD858269	RENTAL	10,022.50	10,022.50			
30199056	11/06/24	037-88981896	11/04/24 - 12/01/24	1HTKJPVK6NH639021	RENTAL	2,949.75	2,949.75			
30199671	11/05/24	037-81279024	11/05/24 - 12/02/24	3ALKCYFE3NDNL1679	RENTAL	10,283.75	10,283.75			
30199856	11/07/24	037-57447168	11/06/24 - 12/03/24	1FVKCYFE4LHKW7413	RENTAL	10,875.00	10,875.00			
30199878	11/07/24	037-1022164423	11/06/24 - 12/03/24	3ALDCXFCXSDVZ3965	RENTAL	7,806.25	7,806.25			
30199879	11/07/24	037-93506416	11/06/24 - 12/03/24	3ALKCYFE2SDVJ8322	RENTAL	10,925.00	10,925.00			
30199911	11/07/24	037-1018819263	11/06/24 - 12/03/24	3ALKCYFE1SDVN2140	RENTAL	10,925.00	10,925.00			
30199912	11/07/24	037-93506405	11/06/24 - 12/03/24	3ALKCYFE8SDVJ8311	RENTAL	10,925.00	10,925.00			
30200079	11/07/24	094-53192749	11/06/24 - 12/03/24	1NPSXJEX0KD261911	RENTAL	10,355.00	10,355.00			
30200263	11/08/24	037-1018815259	11/07/24 - 12/04/24	3ALKCYFE7SDVN2143	RENTAL	10,925.00	10,925.00			
30200315	11/08/24	082-562545	11/07/24 - 12/04/24	3C7WRNFL1PG562545	RENTAL	2,949.75	2,949.75			
30205702	11/23/24	037-61600037	11/07/24 - 11/11/24	1FVDCXFC2LHKW7265	RENTAL CM	-662.50		-662.50		
30205703	11/23/24	037-67524134	11/07/24 - 11/13/24	3ALDCXFC9MDLB7355	RENTAL CM	-927.50		-927.50		
30205705	11/23/24	037-1019268727	11/07/24 - 11/13/24	3ALDCXFC7SDVJ4221	RENTAL CM	-951.56		-951.56		
30205707	11/23/24	094-55876123	11/07/24 - 11/14/24	1NPSXJEX0KD616074	RENTAL CM	-3,121.43		-3,121.43		
30205717	11/23/24	037-84438226	11/07/24 - 11/12/24	3ALKCYFE7PDUH4370	RENTAL CM	-2,203.66		-2,203.66		
30205720	11/23/24	037-81279024	11/07/24 - 12/02/24	3ALKCYFE3NDNL1679	RENTAL CM	-9,549.20		-9,549.20		
30205725	11/23/24	037-76369000	11/07/24 - 11/18/24	1FVKCYFE7MHMT3120	RENTAL CM	-4,427.68		-4,427.68		
30205762	11/23/24	037-93506405	11/07/24 - 12/03/24	3ALKCYFE8SDVJ8311	RENTAL CM	-10,534.82		-10,534.82		
30205763	11/23/24	037-93506409	11/07/24 - 11/07/24	3ALKCYFE5SDVJ8315	RENTAL CM	-390.18		-390.18		
30205765	11/23/24	037-93506416	11/07/24 - 12/03/24	3ALKCYFE2SDVJ8322	RENTAL CM	-10,534.82		-10,534.82		
30205773	11/23/24	081-268236	11/07/24 - 11/18/24	1T92C1723NS268236	RENTAL CM	-2,243.83		-2,243.83		
30205776	11/23/24	094-77597449	11/07/24 - 11/13/24	3ALKCYFE9NDMY1273	RENTAL CM	-1,910.99		-1,910.99		
30205779	11/23/24	094-53192749	11/07/24 - 12/03/24	1NPSXJEX0KD261911	RENTAL CM	-9,985.17		-9,985.17		
30205804	11/23/24	037-1018815259	11/07/24 - 12/04/24	3ALKCYFE7SDVN2143	RENTAL CM	-10,925.00		-10,925.00		
30205805	11/23/24	037-1018819263	11/07/24 - 12/03/24	3ALKCYFE1SDVN2140	RENTAL CM	-10,534.82		-10,534.82		

Rokstad Pre-Petition Bal For Bad Debt Write Off 11-25-24 (003).xls

Inv Num	Inv Date	Unit Num	Billing Period	Chs VIN	Trans Type	Balance Due	Current	Over 30	Over 60	Over 90
30205823	11/23/24	081-268122	11/07/24 - 11/14/24	1T92C212XNS268122	RENTAL CM	-1,560.71		-1,560.71		
30205827	11/23/24	037-1022164423	11/07/24 - 12/03/24	3ALDCXFCXSDVZ3965	RENTAL CM	-3,670.31		-3,670.31		
30205829	11/23/24	037-78995374	11/07/24 - 11/25/24	3ALDCXFC8NDNG1726	RENTAL CM	-2,517.50		-2,517.50		
30205830	11/23/24	037-78359607	11/07/24 - 11/19/24	3ALDCXFC1NDNA6082	RENTAL CM	-1,767.19		-1,767.19		
30205833	11/23/24	094-63672976	11/07/24 - 11/27/24	1NPCXJEX8LD706580	RENTAL CM	-8,193.75		-8,193.75		
30205880	11/23/24	094-77597368	11/07/24 - 11/24/24	3ALKCYFE7NDMY1286	RENTAL CM	-5,267.41		-5,267.41		
30205881	11/23/24	082-UF9389	11/07/24 - 11/24/24	1FVDG5FE0PHUF9389	RENTAL CM	-2,509.85		-2,509.85		
30205882	11/23/24	082-562561	11/07/24 - 11/24/24	3C7WRNFLXPG562561	RENTAL CM	-1,896.26		-1,896.26		
30205883	11/23/24	037-57447168	11/07/24 - 12/03/24	1FVKCYFE4LHKW7413	RENTAL CM	-10,486.61		-10,486.61		
30205885	11/23/24	037-60026666	11/07/24 - 11/13/24	3HAEEMMN9LL074167	RENTAL CM	-927.50		-927.50		
30205889	11/23/24	037-1016499122	11/07/24 - 11/25/24	3ALDCXFC7SDVX3785	RENTAL CM	-2,517.50		-2,517.50		
30205890	11/23/24	037-93506309	11/07/24 - 11/24/24	3ALKCYFE4RDVE6841	RENTAL CM	-7,023.21		-7,023.21		
30205891	11/23/24	082-UF9387	11/07/24 - 11/24/24	1FVDG5FE7PHUF9387	RENTAL CM	-2,509.85		-2,509.85		
30205898	11/23/24	082-562544	11/07/24 - 11/24/24	3C7WRNFLXPG562544	RENTAL CM	-1,896.26		-1,896.26		
30205925	11/23/24	037-88981896	11/07/24 - 12/01/24	1HTKJPVK6NH639021	RENTAL CM	-2,633.70		-2,633.70		
30205926	11/23/24	037-93506404	11/07/24 - 11/07/24	3ALKCYFE6SDVJ8310	RENTAL CM	-390.18		-390.18		
30205928	11/23/24	082-562545	11/07/24 - 12/04/24	3C7WRNFL1PG562545	RENTAL CM	-2,949.75		-2,949.75		
30205932	11/23/24	082-039446	11/07/24 - 11/18/24	1FTBF2B69MEC39446	RENTAL CM	-699.11		-699.11		
30205954	11/23/24	094-78731586	11/07/24 - 11/20/24	3ALKCYFE1NDNB7582	RENTAL CM	-3,969.38		-3,969.38		
30206081	11/24/24	097-49790726	11/07/24 - 11/27/24	3HAWBMMN9KL713191	RENTAL CM	-2,670.16		-2,670.16		
30206102	11/24/24	094-85164844	11/07/24 - 12/01/24	1NPCXJEX3PD858269	RENTAL CM	-8,948.66		-8,948.66		
30206159	11/24/24	097-92461216	11/07/24 - 11/21/24	1FVDCXFC1SHVV3994	RENTAL CM	-2,048.44		-2,048.44		
30206165	11/24/24	097-66049684	11/07/24 - 11/24/24	3HAEEMMN7ML314625	RENTAL CM	-2,385.00		-2,385.00		
30206176	11/24/24	094-90972398	11/07/24 - 11/14/24	1NPCXJEX5RD682134	RENTAL CM	-3,121.43		-3,121.43		
30206179	11/24/24	094-81437341	11/07/24 - 11/07/24	1FVKCYFE1NHNL1481	RENTAL CM	-291.30		-291.30		
30206184	11/24/24	097-92461194	11/07/24 - 11/24/24	1FVDCXFC6SHVX3819	RENTAL CM	-2,458.13		-2,458.13		
7362823	10/29/24	082-562544	-	3C7WRNFLXPG562544	TOLLS	45.15	45.15			
Totals:						336,487.71	171,012.51	167,339.18	-1,863.98	0.00

Post-Petition Past Due Balance

01/27/25

Inv Num	Inv Date	Unit Num	Billing Period	Chs VIN	Trans Type	Balance Due	Current	Over 30	Over 60	Over 90
30211105	12/06/24	097-92461216	12/05/24 - 01/01/25	1FVDCXFC1SHVV3994	RENTAL	3,823.75		3,823.75		
30211102	12/06/24	097-49790726	12/05/24 - 01/01/25	3HAWBMMN9KL713191	RENTAL	3,560.21		3,560.21		
30211066	12/06/24	082-562561	12/05/24 - 01/01/25	3C7WRNFLXPG562561	RENTAL	2,949.75		2,949.75		
30211104	12/06/24	097-92461194	12/05/24 - 01/01/25	1FVDCXFC6SHVX3819	RENTAL	3,823.75		3,823.75		
30211095	12/06/24	094-78731586	12/05/24 - 01/01/25	3ALKCYFE1INDNB7582	RENTAL	7,938.75		7,938.75		
30211065	12/06/24	082-562545	12/05/24 - 01/01/25	3C7WRNFL1PG562545	RENTAL	2,949.75		2,949.75		
30211099	12/06/24	094-90972398	12/05/24 - 01/01/25	1NPCXJEX5RD682134	RENTAL	10,925.00		10,925.00		
30211060	12/06/24	037-93506409	12/05/24 - 01/01/25	3ALKCYFE5SDVJ8315	RENTAL	10,925.00		10,925.00		
30211061	12/06/24	037-93506416	12/05/24 - 01/01/25	3ALKCYFE2SDVJ8322	RENTAL	10,925.00		10,925.00		
30211092	12/06/24	094-55876123	12/05/24 - 01/01/25	1NPSXJEX0KD616074	RENTAL	10,925.00		10,925.00		
30211098	12/06/24	094-85164844	12/05/24 - 01/01/25	1NPCXJEX3PD858269	RENTAL	10,022.50		10,022.50		
30211106	12/06/24	037-1018815259	12/05/24 - 01/01/25	3ALKCYFE7SDVN2143	RENTAL	10,925.00		10,925.00		
30211094	12/06/24	094-77597368	12/05/24 - 01/01/25	3ALKCYFE7NDMY1286	RENTAL	8,193.75		8,193.75		
30211062	12/06/24	081-268122	12/05/24 - 01/01/25	1T92C212XNS268122	RENTAL	5,462.50		5,462.50		
30211064	12/06/24	082-562544	12/05/24 - 01/01/25	3C7WRNFLXPG562544	RENTAL	527.75		527.75		
30211090	12/06/24	094-53192749	12/05/24 - 01/01/25	1NPSXJEX0KD261911	RENTAL	10,355.00		10,355.00		
30211089	12/06/24	082-UF9387	12/05/24 - 01/01/25	1FVDG5FE7PHUF9387	RENTAL	3,904.20		3,904.20		
30211063	12/06/24	081-268236	12/05/24 - 01/01/25	1T92C1723NS268236	RENTAL	5,235.60		5,235.60		
30211091	12/06/24	082-UF9389	12/05/24 - 01/01/25	1FVDG5FE0PHUF9389	RENTAL	3,904.20		3,904.20		
30211093	12/06/24	094-63672976	12/05/24 - 01/01/25	1NPCXJEX8LD706580	RENTAL	10,925.00		10,925.00		
Totals:						138,201.46	0.00	138,201.46	0.00	0.00