



This is the 1st affidavit
of Colin Brousson in this case
and was made on September 15, 2025

No. S-243645
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE COMPANIES' CREDITORS
ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED

-AND-

IN THE MATTER OF THE BUSINESS CORPORATIONS ACT, S.B.C.
2002, c. 57

-AND-

IN THE MATTER OF THE PLAN OF COMPROMISE AND
ARRANGEMENT OF INCA ONE GOLD CORP.

PETITIONER

AFFIDAVIT

I, Colin Brousson, of Suite 2700 – 1133 Melville Street, Vancouver, British Columbia,
Lawyer, AFFIRM THAT:

1. I am a lawyer at DLA Piper (Canada) LLP ("**DLA**"), counsel to FTI Consulting Canada Inc., in its capacity as the former monitor (the "**Monitor**") and the court-appointed receiver and manager of the assets, undertakings and property of Inca One Gold Corp. (the "**Receiver**") in these proceedings, and as such have personal knowledge of the facts and matters hereinafter deposed to save and except where the same are stated to be made upon information and belief and where so stated I verily believe them to be true.
2. The accounts of DLA issued to the Monitor and the Receiver for services from May 29, 2024 to August 26, 2025, can be summarized as follows:

Invoice Period	Fees	Disbursements	Taxes	Total
May 29 – June 30, 2024	\$44,016.00	\$7.00	\$5,282.00	\$49,305.00
July 1 – 31, 2024	\$27,959.00	\$7.00	\$3,355.16	\$31,321.16

Invoice Period	Fees	Disbursements	Taxes	Total
August 1 – 31, 2024	\$16,219.00	\$0.00	\$1,946.28	\$18,165.28
September 1 – 30, 2024	\$11,345.00	\$100.00	\$1,377.20	\$12,912.20
October 1 – 31, 2024	\$25,586.00	\$392.00	\$3,089.65	\$29,067.65
November 1 – 30, 2024	\$5,852.50	\$0.00	\$702.31	\$6,554.81
December 1 – 31, 2024	\$11,402.50	\$0.00	\$1,368.31	\$12,770.81
January 1 – 31, 2025	\$8,212.50	\$0.00	\$985.51	\$9,198.01
February 1 – 28, 2025	\$21,562.50	\$41.85	\$2,589.60	\$24,193.95
March 1 – 31, 2025	\$40,325.00	\$582.26	\$4,841.25	\$45,748.51
April 1 – 30, 2025	\$1,020.00	\$0.00	\$122.40	\$1,142.40
May 1 – July 11, 2025	\$2,805.00	\$0.00	\$336.35	\$3,141.60
July 12 – August 26, 2025	\$1,680.00	\$0.00	\$201.60	\$1,680.00
TOTAL:	\$218,075.00	\$1,130.11	\$26,197.87	\$245,402.98

3. The fees and disbursements set out above were necessarily incurred in fulfilling the instructions of the Monitor and the Receiver and have been approved by the Monitor and the Receiver, respectively.
4. The services compromised in the accounts of DLA set out above relate to, among other things:
 - (a) Review and revising four Monitor's Reports and two Receiver's reports;
 - (b) Preparing for and attending in court on six applications for the Monitor and two applications for the Receiver;
 - (c) Attending meetings with the Monitor, the Debtor, Peruvian counsel, and the Debtor's stakeholders;
 - (d) Attending meetings relating to the DIP financing;
 - (e) Reviewing and providing comments on the DIP term sheet;
 - (f) Reviewing and revising terms of the claims process;
 - (g) Preparing and completing the sales process;

- (h) Negotiation of the OCIM Transaction documentation;
- (i) Attending upon Court approval of the OCIM Transaction;
- (j) Attending to closing of the OCIM Transaction; and
- (k) Assisting with post-closing requirements.

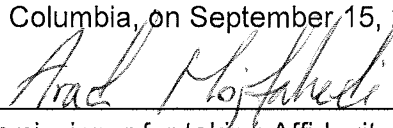
5. The total cumulative time comprised in the accounts of DLA is 342.1 hours broken down as follows:

Lawyer	Avg. Rate	Hours
Colin D. Brousson	\$825	186.0
Jeffrey Bradshaw	\$650	29.3
Don Collie	\$725	16.9
Carole Hunter	\$725	6.4
Arad Mojtahedi	\$550	10.8
Holly Yuen	\$350	87.8
Claudia Tsao	\$425	2.4
Christina Hoang	\$375	0.5
Dannis Yang	\$95	2.0
Total:		342.1

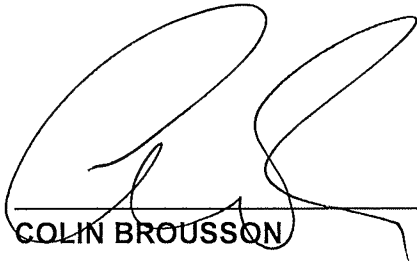
6. The legal advice and services were rendered to the Receiver and the Monitor at Suite 1450, 701 West Georgia Street, Vancouver, BC.

7. I was called to the Bar and admitted as a solicitor in the Province of British Columbia in May 1996 and since that time have primarily acted in insolvency and realization matters and in financing issues, including advice to trustees in bankruptcy. I have written papers and lectured on insolvency and realization issues for the Continuing Legal Education Society and other groups.

AFFIRMED BEFORE ME at Vancouver,
British Columbia, on September 15, 2025.


A Commissioner for taking Affidavits for
British Columbia.

)
)
)
)
)
)
)


COLIN BROUSSON

Arad Mojtahedi
Barrister & Solicitor
DLA Piper (Canada) LLP
1133 Melville Street, Suite 2700
Vancouver, BC V6E 4E5
604.687.9444

No. S-243645
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE *COMPANIES' CREDITORS*
ARRANGEMENT ACT, R.S.C. 1985, C.C-36, AS
AMENDED

AND

IN THE MATTER OF THE *BUSINESS CORPORATIONS*
ACT, S.B.C. 2002, C. 57

AND

IN THE MATTER OF THE PLAN OF COMPROMISE AND
ARRANGEMENT OF INCA ONE GOLD CORP.

PETITIONER

AFFIDAVIT

DLA Piper (Canada) LLP
Barristers & Solicitors
Suite 2700
1133 Melville Street
Vancouver, BC V6E 4E5

Tel. No. 604.687.9444
Fax No. 604.687.1612

File No.: 039071-00006

CDB/