



This is Affidavit #1 of
H. Lance Williams in this case and
was made on August 18, 2026

No. S-256472
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN

NATIONAL BANK OF CANADA

PETITIONER

AND

**CARVOLTH 86TH AVENUE LANDS LTD., MASKEEN (CARVOLTH) GP INC.
AND MASKEEN (CARVOLTH) LIMITED PARTNERSHIP**

RESPONDENTS

A F F I D A V I T

I, **H. Lance Williams**, lawyer, of 2400 – 745 Thurlow Street, Vancouver, British Columbia, SWEAR THAT:

1. I am a partner at McCarthy Tétrault LLP ("**McCarthy**"), counsel for FTI Consulting Canada Inc., the court-appointed receiver and manager (in such capacity, the "**Receiver**"), without security, of all of the assets, undertakings and property of the Respondents, Carvolth 86th Avenue Lands Ltd., Maskeen (Carvolth) GP Inc. and Maskeen (Carvolth) Limited Partnership, and as such, I have personal knowledge of the facts hereinafter deposed to except where stated to be on information and belief, in which case I verily believe them to be true.
2. I have had primary carriage of this proceeding.
3. Attached hereto and marked as indicated are the following Exhibits (together, the "**Invoices**" or the "**McCarthy Invoices**");

Exhibit	Invoice Number	Invoice Date	Amount
"A"	8604136	October 17, 2025	\$1,626.81
"B"	8605333	November 17, 2025	\$3,059.29
"C"	8608883	December 31, 2025	\$95.20

Exhibit	Invoice Number	Invoice Date	Amount
"D"	8610243	February 17, 2026	\$3,006.23
"E"	8611949	March 26, 2026	\$1,899.00
"F"	8612867	April 15, 2026	\$7,881.28
"G"	8615473	May 29, 2026	\$2,169.44
"H"	8616705	June 30, 2026	\$1,598.67
"I"	8618013	July 30, 2026	\$1,763.75
TOTAL:			\$23,099.67

4. As detailed in the Invoices, from August 28, 2025 to June 30, 2026, McCarthy's invoiced fees amounted to \$20,407.50, invoiced disbursements amounted to \$234.04, and invoiced taxes amounted to \$2,458.13, for a total of \$23,099.67.

5. The fees set out in the Invoices are calculated on the basis of the hours spent by McCarthy personnel, multiplied by the applicable standard hourly rates charged by McCarthy. The total time comprised in the Invoices is 27.80 hours at an average hourly rate of \$734.08 per hour ($\$20,407.50 \div 27.80$). To the best of my knowledge, information and belief, those hourly rates are consistent with those charged by other law firms for work of a similar nature in Vancouver, British Columbia.

6. The following summary sets out the total hours billed by all lawyers and other employees of McCarthy working on this matter, and their respective hourly rates:

Timekeeper	Title	Hours	Rate	Total Billed
Williams, Lance	Partner	0.90	\$860.00 (2025)	\$774.00
		4.40	\$990.00 (2026)	\$4,356.00
Shirreff, Craig	Partner	0.40	\$1,125.00	\$450.00
Williams, Patrick	Partner	3.10	\$835.00	\$2,588.50
Bowron, Ashley	Associate	4.80	\$675.00 (2025)	\$3,240.00
		0.50	\$740.00 (2026)	\$370.00
Fox, Thomas	Associate	9.20	\$720.00	\$6,624.00
Dreijer, Liezl	Paralegal	1.00	\$455.00	\$445.00
Danielisz, Sue	Paralegal	0.60	\$425.00 (2025)	\$255.00
		1.10	\$455.00 (2026)	\$500.50

Timekeeper	Title	Hours	Rate	Total Billed
Yard, Tammy	Paralegal	0.90	\$510.00	\$459.0
Grewal, Harleen	Paralegal	0.20	\$360.00	\$72.00
Gonzales, Isabel	Paralegal	0.20	\$380.00	\$76.00
Chi, Jieru	Articling Student	0.50	\$395.00	\$197.50
Total:		27.80		\$20,407.50

7. I primarily directed this matter. I have been a member of McCarthy's insolvency group since joining the firm as a partner in August of 2021. Prior to joining McCarthy, I was a partner in the insolvency group at Cassels, Brock & Blackwell LLP ("**Cassels**") until joining McCarthy. Prior to joining Cassels, I was a member of the DLA Piper (Canada) LLP ("**DLAP**") insolvency group since joining that firm as an associate in 2008. I became a partner of DLAP in 2014, and continued practicing in the DLAP insolvency group until joining Cassels. I was called to the bars of Alberta and Saskatchewan in 2007, British Columbia in 2008, and Yukon in 2015. I practice primarily in the area of commercial insolvency, including on numerous complex restructuring and receivership matters. I am recognized in Chambers, Best Lawyers in Canada and Lexpert, among other rankings, for insolvency and restructuring. I am also a member of the British Columbia Model Order Committee, have published several publications on complex restructuring matters and previously taught insolvency law at the University of British Columbia law school. Attached hereto and marked as **Exhibit "J"** is a true copy of my *curriculum vitae* maintained by McCarthy.

8. To the best of my knowledge, information and belief, the information contained in the Invoices as to:

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

is true and correct in all respects.

9. I have reviewed the McCarthy Invoices and do verily believe that:

- (a) McCarthy's professional fees and disbursements have been properly incurred and are fair and reasonable in the circumstances;
- (b) the work completed by McCarthy was delegated to the appropriate professionals in McCarthy with the appropriate seniority and appropriate hourly rates;
- (c) McCarthy's fees in this matter are consistent with the fees charged by similar firms with the capacity to handle a file of comparable size and complexity;
- (d) the Invoices were provided to the Receiver when rendered, and all have been approved by the Receiver; and
- (e) the services were performed by McCarthy in a prudent and economical manner.

10. I estimate that McCarthy's fees to the conclusion of this matter will be approximately \$25,000.

11. I make this affidavit expressly for the purposes of the Receiver's application to approve its invoices and the McCarthy Invoices, and for no other purpose. In particular, nothing herein is a waiver of solicitor-client privilege by the Receiver.

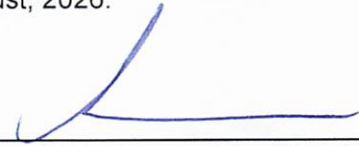
SWORN BEFORE ME at the City of
Vancouver, in the Province of British
Columbia, this 18th day of August, 2026.

A Commissioner for taking Affidavits for
British Columbia


H. LANCE WILLIAMS

ASHLEY BOWRON
Barrister & Solicitor
McCarthy Tétrault LLP
SUITE 2400 - 745 THURLOW STREET
VANCOUVER, B.C. V6E 0C5
604-643-7973

This is **Exhibit "A"** referred to in **Affidavit #1** of **H. Lance Williams**, sworn before me at Vancouver, British Columbia, this 18th day of August, 2026.

A handwritten signature in blue ink, consisting of a stylized 'L' shape with a horizontal line extending to the right.

A Commissioner for taking Affidavits
for British Columbia



McCarthy Tétrault LLP
 Suite 2400, 745 Thurlow Street
 Vancouver, British Columbia
 V6E 0C5
 Tel: 604-643-7100
 Fax: 604-643-7900

FTI Consulting Canada Inc.
 900 West Hastings Street
 Suite 500
 Vancouver, BC V6C 1E5

Invoice No: 8604136
 GST/HST Reg. No: 116532839
 Date: October 17, 2025

Attention: Tom Powell
 Senior Managing Director

FTI Consulting Canada Inc.
 Reference: Maskeen (Carvolth) GP Inc., et al
 207091-607950

For Professional Services Rendered for the period ending September 30, 2025

OUR FEES			\$	1,452.50
Disbursements	Non-Taxable	\$	0.00	
	Taxable		0.00	0.00
GST	Fees	\$	72.63	
	Disbursements		0.00	72.63
PST (BC)	Fees	\$	101.68	101.68
TOTAL DUE ON ABOVE-NOTED MATTER			\$	<u>1,626.81</u>

McCarthy Tétrault LLP

DocuSigned by:

 0B38D88CABCB430...
 Lance Williams

PLEASE NOTE THIS ACCOUNT IS PAYABLE IN CANADIAN DOLLARS.

Direct Deposit or Wire Transfer Instructions –TD Canada Trust, 55 King Street West, Toronto, Ontario M5K 1A2, Canada, Bank: 004, Transit Number: 10202, Acct No.: 5307124 (CDN\$) or 7349662 (US\$), Swift Code TDOMCATTTOR, Canadian Routing No. //CC0004 10202. Please email TOR-AR@mccarthy.ca with payment details indicating invoice no.(s), our matter number and the lawyer's name.
Cheque by Mail: McCarthy Tétrault LLP, C/O T9647 (CDN\$) or T9647U (US\$), PO Box 9647, Station A, Toronto, ON M5W 1P8.
Cheque by Courier: TD Wholesale Lockbox, 4 Prince Andrew Place, Dock 4, Toronto, Ontario M3C 2H4, Attention: McCarthy Tétrault LLP, C/O T9647 (CDN\$) or T9647U (US\$).

Terms: Invoice payable upon receipt. Interest charged on any unpaid balance at a rate of 12.00% per annum calculated 30 days from invoice date. Any charges not posted to your account by the date of this invoice will be billed at a later date.



FTI Consulting Canada Inc.
 Re: Maskeen (Carvolth) GP Inc., et al
 207091-607950

Invoice No. 8604136
 Page No. 2

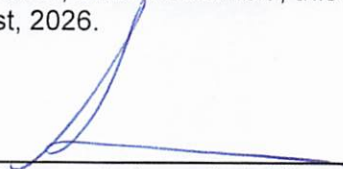
FEE DETAIL

<u>Date</u> (dd/mm/yy)	<u>Timekeeper</u> <u>Initials</u>	<u>Hours</u>	<u>Description</u>
28/08/25	ABO	0.50	Review receivership application materials; call with FTI re case background.
02/09/25	ABO	0.40	Review and comment on draft receivership order.
08/09/25	SDZ	0.40	Create hyperlinked e-pleadings court records index and populate; create service list.
10/09/25	ABO	0.20	Email FTI re hearing dates.
15/09/25	ABO	0.20	Correspond with FTI re hearing.
29/09/25	ABO	0.30	Review petition response.
30/09/25	ABO	0.30	Correspond with FTI re petition response.

FEE SUMMARY

<u>Timekeeper Name</u>	<u>Hours</u>
Bowron, Ashley	1.90
Danielisz, Susan	0.40
	<u>2.30</u>

This is **Exhibit "B"** referred to in **Affidavit #1** of **H. Lance Williams**, sworn before me at Vancouver, British Columbia, this 18th day of August, 2026.



A Commissioner for taking Affidavits
for British Columbia



McCarthy Tétrault LLP
 Suite 2400, 745 Thurlow Street
 Vancouver, British Columbia
 V6E 0C5
 Tel: 604-643-7100
 Fax: 604-643-7900

FTI Consulting Canada Inc.
 900 West Hastings Street
 Suite 500
 Vancouver, BC V6C 1E5

Invoice No: 8605333
 GST/HST Reg. No: 116532839
 Date: November 17, 2025

Attention: Tom Powell
 Senior Managing Director

FTI Consulting Canada Inc.
 Reference: Maskeen (Carvolth) GP Inc., et al
 207091-607950

For Professional Services Rendered for the period ending October 31, 2025

OUR FEES			\$	2,731.50
Disbursements	Non-Taxable	\$	0.00	
	Taxable		0.00	0.00
GST	Fees	\$	136.58	
	Disbursements		0.00	136.58
PST (BC)	Fees	\$	191.21	191.21
TOTAL DUE ON ABOVE-NOTED MATTER			\$	3,059.29

McCarthy Tétrault LLP

DocuSigned by:

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 Lance Williams

PLEASE NOTE THIS ACCOUNT IS PAYABLE IN CANADIAN DOLLARS.

Direct Deposit or Wire Transfer Instructions –TD Canada Trust, 55 King Street West, Toronto, Ontario M5K 1A2, Canada, Bank: 004, Transit Number: 10202, Acct No.: 5307124 (CDN\$) or 7349662 (US\$), Swift Code TDOMCATTOR, Canadian Routing No. //CC0004 10202. Please email TOR-AR@mccarthy.ca with payment details indicating invoice no.(s), our matter number and the lawyer's name.
Cheque by Mail: McCarthy Tétrault LLP, C/O T9647 (CDN\$) or T9647U (US\$), PO Box 9647, Station A, Toronto, ON M5W 1P8.
Cheque by Courier: TD Wholesale Lockbox, 4 Prince Andrew Place, Dock 4, Toronto, Ontario M3C 2H4, Attention: McCarthy Tétrault LLP, C/O T9647 (CDN\$) or T9647U (US\$).

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FTI Consulting Canada Inc.
Re: Maskeen (Carvolth) GP Inc., et al
207091-607950

Invoice No. 8605333
Page No. 2

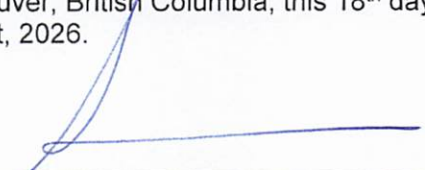
FEE DETAIL

<u>Date</u> <u>(dd/mm/yy)</u>	<u>Timekeeper</u> <u>Initials</u>	<u>Hours</u>	<u>Description</u>
27/08/25	LWI	0.60	Receive and review receivership materials.
28/08/25	LWI	0.20	Call with FTI re materials and filing.
05/10/25	ABO	0.40	Review and consider opposition filed to receivership.
07/10/25	ABO	2.50	Prepare for and attend receivership appointment hearing; correspondence with FTI re same; review and comment on draft orders from company counsel.
07/10/25	LWI	0.10	Review revised orders/blacklines.

FEE SUMMARY

<u>Timekeeper Name</u>	<u>Hours</u>
Bowron, Ashley	2.90
Williams, Lance	0.90
	<u>3.80</u>

This is **Exhibit "C"** referred to in **Affidavit #1** of **H. Lance Williams**, sworn before me at Vancouver, British Columbia, this 18th day of August, 2026.



A Commissioner for taking Affidavits
for British Columbia



McCarthy Tétrault LLP
Suite 2400, 745 Thurlow Street
Vancouver, British Columbia
V6E 0C5
Tel: 604-643-7100
Fax: 604-643-7900

FTI Consulting Canada Inc.
900 West Hastings Street
Suite 500
Vancouver, BC V6C 1E5

Invoice No: 8608883
GST/HST Reg. No: 116532839
Date: December 31, 2025

Attention: Tom Powell
Senior Managing Director

FTI Consulting Canada Inc.
Reference: Maskeen (Carvolth) GP Inc., et al
207091-607950

For Professional Services Rendered for the period ending December 31, 2025

OUR FEES			\$	85.00
Disbursements	Non-Taxable	\$	0.00	
	Taxable		0.00	0.00
GST	Fees	\$	4.25	
	Disbursements		0.00	4.25
PST (BC)	Fees	\$	5.95	5.95
TOTAL DUE ON ABOVE-NOTED MATTER			\$	95.20

McCarthy Tétrault LLP

DocuSigned by:

0B38D88CABCB430...
Lance Williams

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FTI Consulting Canada Inc.
Re: Maskeen (Carvolth) GP Inc., et al
207091-607950

Invoice No. 8608883
Page No. 2

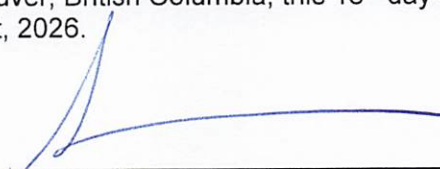
FEE DETAIL

<u>Date</u> <u>(dd/mm/yy)</u>	<u>Timekeeper</u> <u>Initials</u>	<u>Hours</u>	<u>Description</u>
03/11/25	SDZ	0.10	Receive copy of entered Order of Justice Fitzpatrick (adjourning petition hearing generally) made October 7, 2025; update e-pleadings court records.
30/12/25	SDZ	0.10	Receive Affidavit #3 of J. Lugo and add to e-pleadings court records.

FEE SUMMARY

<u>Timekeeper Name</u>	<u>Hours</u>
Danielisz, Susan	0.20
	<u>0.20</u>

This is **Exhibit "D"** referred to in **Affidavit #1** of **H. Lance Williams**, sworn before me at Vancouver, British Columbia, this 18th day of August, 2026.



A Commissioner for taking Affidavits
for British Columbia



McCarthy Tétrault LLP
 Suite 2400, 745 Thurlow Street
 Vancouver, British Columbia
 V6E 0C5
 Tel: 604-643-7100
 Fax: 604-643-7900

FTI Consulting Canada Inc.
 900 West Hastings Street
 Suite 500
 Vancouver, BC V6C 1E5

Invoice No: 8610243
 GST/HST Reg. No: 116532839
 Date: February 17, 2026

Attention: Tom Powell
 Senior Managing Director

FTI Consulting Canada Inc.
 Reference: Maskeen (Carvolth) GP Inc., et al
 207091-607950

For Professional Services Rendered for the period ending January 30, 2026

OUR FEES			\$	2,678.50
Disbursements	Non-Taxable	\$	0.00	
	Taxable		6.00	6.00
			\$	2,684.50
GST	Fees	\$	133.93	
	Disbursements		0.30	134.23
PST (BC)	Fees	\$	187.50	187.50
TOTAL DUE ON ABOVE-NOTED MATTER			\$	3,006.23

McCarthy Tétrault LLP

DocuSigned by:

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Lance Williams

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Cheque by Mail: McCarthy Tétrault LLP, C/O T9647 (CDN\$) or T9647U (US\$), PO Box 9647, Station A, Toronto, ON M5W 1P8.
Cheque by Courier: TD Wholesale Lockbox, 4 Prince Andrew Place, Dock 4, Toronto, Ontario M3C 2H4, Attention: McCarthy Tétrault LLP, C/O T9647 (CDN\$) or T9647U (US\$).

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FTI Consulting Canada Inc.
 Re: Maskeen (Carvolth) GP Inc., et al
 207091-607950

Invoice No. 8610243
 Page No. 2

FEE DETAIL

<u>Date</u> (dd/mm/yy)	<u>Timekeeper</u> <u>Initials</u>	<u>Hours</u>	<u>Description</u>
02/01/26	LWI	0.20	Review materials for appointment.
08/01/26	LWI	2.00	Prepare for and attend hearing for receiver; coordinate in relation to same.
08/01/26	SDZ	0.10	Receive copy of entered Receivership Order granted by Justice Fitzpatrick on January 8, 2026 and add to e-pleadings court records.
09/01/26	SDZ	0.80	Conduct BC court records search of Supreme Court File No. S-256472; provide search results and copies of pleadings to L. Yan at FTI Consulting; update service list and provide to L. Yan for posting on receiver's website.
16/01/26	SDZ	0.20	Obtain word version of Receiver Certificate from Petitioner's counsel and forward to L. Yan.

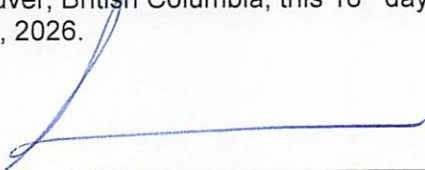
FEE SUMMARY

<u>Timekeeper Name</u>	<u>Hours</u>
Danielisz, Susan	1.10
Williams, Lance	2.20
	<u>3.30</u>

DISBURSEMENT SUMMARY

<u>Taxable Y/N</u>	<u>Description</u>	<u>Total Cost</u>
Y	Search Fees - BC OnLine (T)	\$ 6.00
	Total Disbursements	<u>\$ 6.00</u>

This is **Exhibit "E"** referred to in **Affidavit #1** of **H. Lance Williams**, sworn before me at Vancouver, British Columbia, this 18th day of August, 2026.



A Commissioner for taking Affidavits
for British Columbia



McCarthy Tétrault LLP
Suite 2400, 745 Thurlow Street
Vancouver, British Columbia
V6E 0C5
Tel: 604-643-7100
Fax: 604-643-7900

FTI Consulting Canada Inc.
900 West Hastings Street
Suite 500
Vancouver, BC V6C 1E5

Invoice No: 8611949
GST/HST Reg. No: 116532839
Date: March 26, 2026

Attention: Tom Powell
Senior Managing Director

FTI Consulting Canada Inc.
Reference: Maskeen (Carvolth) GP Inc., et al
207091-607950

For Professional Services Rendered for the period ending February 28, 2026

OUR FEES			\$	1,597.00
Disbursements	Non-Taxable	\$	0.00	
	Taxable		105.10	105.10
			\$	1,702.10
GST	Fees	\$	79.85	
	Disbursements		5.26	85.11
PST (BC)	Fees	\$	111.79	111.79
TOTAL DUE ON ABOVE-NOTED MATTER			\$	1,899.00

McCarthy Tétrault LLP

DocuSigned by:

0B38D88CABCB430...
Lance Williams

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Direct Deposit or Wire Transfer Instructions –TD Canada Trust, 55 King Street West, Toronto, Ontario M5K 1A2, Canada, Bank: 004, Transit Number: 10202, Acct No.: 5307124 (CDN\$) or 7349662 (US\$), Swift Code TDOMCATTOR, Canadian Routing No. //CC0004 10202. Please email TOR-AR@mccarthy.ca with payment details indicating invoice no.(s), our matter number and the lawyer's name.
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FTI Consulting Canada Inc.
 Re: Maskeen (Carvolth) GP Inc., et al
 207091-607950

Invoice No. 8611949
 Page No. 2

FEE DETAIL

<u>Date</u> (dd/mm/yy)	<u>Timekeeper</u> <u>Initials</u>	<u>Hours</u>	<u>Description</u>
11/02/26	PWI	0.30	Emails on lease termination.
11/02/26	LWI	0.20	Correspond re lease.
11/02/26	ABO	0.30	Address disclaimer of lease question.
12/02/26	LWI	0.10	Review lease termination letter and correspondence re same.
12/02/26	IGO	0.20	Conduct BC Corporate Registry search for Tannin Developments, Ltd.; prepare and send report email.
12/02/26	PWI	0.70	Draft letter on lease termination.
23/02/26	PWI	0.10	Emails on lease termination.
25/02/26	PWI	0.10	Emails on lease termination.

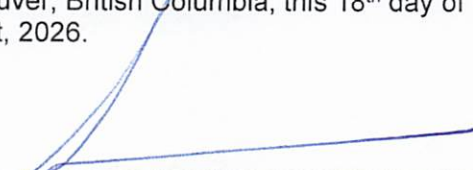
FEE SUMMARY

<u>Timekeeper Name</u>	<u>Hours</u>
Bowron, Ashley	0.30
Gonzales, Isabel	0.20
Williams, Lance	0.30
Williams, Patrick	1.20
	<u>2.00</u>

DISBURSEMENT SUMMARY

<u>Taxable Y/N</u>	<u>Description</u>	<u>Total Cost</u>
Y	Courier / Messenger	\$ 96.60
Y	Search Fees - BC OnLine (T)	8.50
	Total Disbursements	<u>\$ 105.10</u>

This is **Exhibit "F"** referred to in **Affidavit #1** of **H. Lance Williams**, sworn before me at Vancouver, British Columbia, this 18th day of August, 2026.



A Commissioner for taking Affidavits
for British Columbia



McCarthy Tétrault LLP
 Suite 2400, 745 Thurlow Street
 Vancouver, British Columbia
 V6E 0C5
 Tel: 604-643-7100
 Fax: 604-643-7900

FTI Consulting Canada Inc.
 900 West Hastings Street
 Suite 500
 Vancouver, BC V6C 1E5

Invoice No: 8612867
 GST/HST Reg. No: 116532839
 Date: April 15, 2026

Attention: Tom Powell
 Senior Managing Director

FTI Consulting Canada Inc.
 Reference: Maskeen (Carvolth) GP Inc., et al
 207091-607950

For Professional Services Rendered for the period ending March 31, 2026

OUR FEES			\$	7,005.50
Disbursements	Non-Taxable	\$	28.49	
	Taxable		6.30	34.79
				\$ 7,040.29
GST	Fees	\$	350.28	
	Disbursements		0.32	350.60
PST (BC)	Fees	\$	490.39	490.39
TOTAL DUE ON ABOVE-NOTED MATTER			\$	7,881.28

McCarthy Tétrault LLP

DocuSigned by:

 0B38D88CABCB430...

Lance Williams

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Cheque by Mail: McCarthy Tétrault LLP, C/O T9647 (CDN\$) or T9647U (US\$), PO Box 9647, Station A, Toronto, ON M5W 1P8.
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FTI Consulting Canada Inc.
 Re: Maskeen (Carvolth) GP Inc., et al
 207091-607950

Invoice No. 8612867
 Page No. 2

FEE DETAIL

<u>Date</u> (dd/mm/yy)	<u>Timekeeper</u> <u>Initials</u>	<u>Hours</u>	<u>Description</u>
10/03/26	LWI	0.40	Review of real estate matters and call re same.
10/03/26	ABO	0.20	Update call with FTI.
15/03/26	LWI	0.10	Review land title matters.
18/03/26	TYA	0.50	Receive and update Listing Agreement; attend to conducting BC Land Title Office name searches and LTO search; attend to title activity subscription and email to L. Williams re same.
18/03/26	CWS	0.40	Review draft AY listing agreement; send comments to L. Williams.
18/03/26	LWI	0.30	Review and revision of listing agreement;
20/03/26	THF	2.60	Review and revise City statutory right of way; review BC Hydro statutory right of way; emails with respect to comments on same.
23/03/26	THF	1.90	Review and revise City statutory right of way; review BC Hydro statutory right of way; emails with respect to comments on same.
23/03/26	PWI	0.70	Draft letter on extension of possession; related emails.
24/03/26	PWI	0.30	Draft letter on extension of possession; related emails.
30/03/26	LWI	0.20	Attend to matters re land titles.
31/03/26	LDJ	0.80	Communications with T. Fox re execution of Form C Charge by Receiver on behalf of registered owner; review Land Title Manual re description and form of execution block; review order; prepare draft sample of execution block reflecting FTI Consulting's details; send to T. Fox.
31/03/26	PWI	0.10	Emails on land occupation.
31/03/26	THF	0.90	Emails with respect to execution of statutory rights of way; review title matters and receivership order to determine changes that need to be made to statutory rights of way for execution by client.

FEE SUMMARY

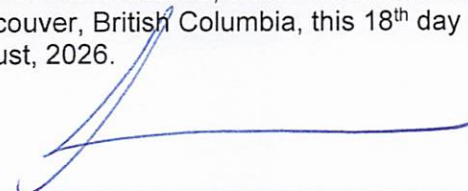
<u>Timekeeper Name</u>	<u>Hours</u>
Bowron, Ashley	0.20
Dreijer, Liezl	0.80
Fox, Thomas	5.40
Shirreff, Craig	0.40
Williams, Lance	1.00
Williams, Patrick	1.10
Yard, Tammy	0.50
	<u>9.40</u>

FTI Consulting Canada Inc.
Re: Maskeen (Carvolth) GP Inc., et al
207091-607950

Invoice No. 8612867
Page No. 3

DISBURSEMENT SUMMARY			
<u>Taxable Y/N</u>	<u>Description</u>		<u>Total Cost</u>
Y	LTSA Service Charge	\$	6.30
N	Filing Fees - LTSA - (NT)		28.49
	Total Disbursements	\$	34.79

This is **Exhibit "G"** referred to in **Affidavit #1** of **H. Lance Williams**, sworn before me at Vancouver, British Columbia, this 18th day of August, 2026.



A Commissioner for taking Affidavits
for British Columbia



McCarthy Tétrault LLP
Suite 2400, 745 Thurlow Street
Vancouver, British Columbia
V6E 0C5
Tel: 604-643-7100
Fax: 604-643-7900

FTI Consulting Canada Inc.
900 West Hastings Street
Suite 500
Vancouver, BC V6C 1E5

Invoice No: 8615473
GST/HST Reg. No: 116532839
Date: May 29, 2026

Attention: Tom Powell
Senior Managing Director

FTI Consulting Canada Inc.
Reference: Maskeen (Carvolth) GP Inc., et al
207091-607950

For Professional Services Rendered for the period ending April 30, 2026

OUR FEES			\$	1,937.00
Disbursements	Non-Taxable	\$	0.00	
	Taxable		0.00	0.00
GST	Fees	\$	96.85	
	Disbursements		0.00	96.85
PST (BC)	Fees	\$	135.59	135.59
TOTAL DUE ON ABOVE-NOTED MATTER			\$	2,169.44

McCarthy Tétrault LLP

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0B38D88CABCB430...
Lance Williams

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FTI Consulting Canada Inc.
 Re: Maskeen (Carvolth) GP Inc., et al
 207091-607950

Invoice No. 8615473
 Page No. 2

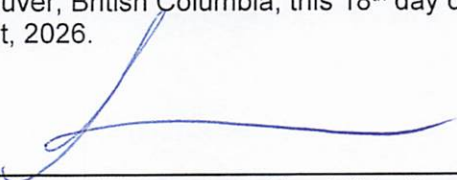
FEE DETAIL

<u>Date</u> (dd/mm/yy)	<u>Timekeeper</u> <u>Initials</u>	<u>Hours</u>	<u>Description</u>
01/04/26	LWI	0.30	Email correspondence and strategic coordination with receiver's financial adviser re proposed sale process, refinancing representations, diligence requirements, pricing guidance, and potential deferral of marketing launch, including follow-up with opposing counsel on receiver' controlled sale process.
02/04/26	THF	0.40	Emails with respect to changes to statutory rights of way with Township of Langley and BC Hydro.
09/04/26	LDJ	0.20	Emails received and sent; communications with T. Fox re LTO execution block.
15/04/26	THF	0.20	Emails with respect to changes to statutory rights of way with Township of Langley and BC Hydro.
22/04/26	THF	0.40	Coordinate execution and witnessing of statutory rights of way.
23/04/26	JCH	0.50	Witness execution by T. Powell.
23/04/26	THF	0.30	Coordinate execution statutory rights of way by first lender.
27/04/26	PWI	0.30	Draft email on Tannin extension.
28/04/26	PWI	0.20	Draft letter on Tannin extension.

FEE SUMMARY

<u>Timekeeper Name</u>	<u>Hours</u>
Chi, Jieru	0.50
Dreijer, Liezl	0.20
Fox, Thomas	1.30
Williams, Lance	0.30
Williams, Patrick	0.50
	<u>2.80</u>

This is **Exhibit "H"** referred to in **Affidavit #1** of **H. Lance Williams**, sworn before me at Vancouver, British Columbia, this 18th day of August, 2026.



A Commissioner for taking Affidavits
for British Columbia



McCarthy Tétrault LLP
Suite 2400, 745 Thurlow Street
Vancouver, British Columbia
V6E 0C5
Tel: 604-643-7100
Fax: 604-643-7900

FTI Consulting Canada Inc.
900 West Hastings Street
Suite 500
Vancouver, BC V6C 1E5

Invoice No: 8616705
GST/HST Reg. No: 116532839
Date: June 30, 2026

Attention: Tom Powell
Senior Managing Director

FTI Consulting Canada Inc.
Reference: Maskeen (Carvolth) GP Inc., et al
207091-607950

For Professional Services Rendered for the period ending May 31, 2026

OUR FEES			\$	1,403.50
Disbursements	Non-Taxable	\$	22.12	
	Taxable		4.40	26.52
			\$	1,430.02
GST	Fees	\$	70.18	
	Disbursements		0.22	70.40
PST (BC)	Fees	\$	98.25	98.25
TOTAL DUE ON ABOVE-NOTED MATTER			\$	1,598.67

McCarthy Tétrault LLP

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Lance Williams

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Cheque by Courier: TD Wholesale Lockbox, 4 Prince Andrew Place, Dock 4, Toronto, Ontario M3C 2H4, Attention: McCarthy Tétrault LLP, C/O T9647 (CDNS) or T9647U (US\$).

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FTI Consulting Canada Inc.
 Re: Maskeen (Carvolth) GP Inc., et al
 207091-607950

Invoice No. 8616705
 Page No. 2

FEE DETAIL

<u>Date</u> <u>(dd/mm/yy)</u>	<u>Timekeeper</u> <u>Initials</u>	<u>Hours</u>	<u>Description</u>
01/05/26	THF	0.40	Emails with respect to lender questions on statutory rights of way.
06/05/26	THF	0.10	Emails with respect to execution of priority agreement for statutory right of way.
13/05/26	LWI	0.20	Review and coordinate form of offer for marketing process.
13/05/26	TYA	0.40	Email from L. Williams; attend to conducting BC Land Title Office searches, update Schedule A and email to L. Williams re same.
15/05/26	LWI	0.20	Review form of offer issues and coordinate revisions to Schedule A re road widening/SRW language.
19/05/26	THF	0.50	Revise schedule A to purchase agreement; emails with respect to same.
25/05/26	PWI	0.10	Emails on potential extension.

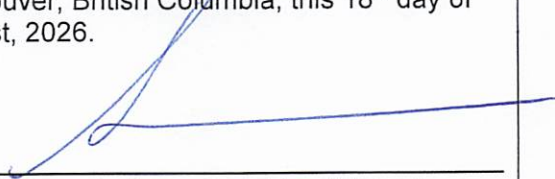
FEE SUMMARY

<u>Timekeeper Name</u>	<u>Hours</u>
Fox, Thomas	1.00
Williams, Lance	0.40
Williams, Patrick	0.10
Yard, Tammy	0.40
	<u>1.90</u>

DISBURSEMENT SUMMARY

<u>Taxable Y/N</u>	<u>Description</u>	<u>Total Cost</u>
Y	LTSA Service Charge	\$ 4.40
N	Filing Fees - LTSA - (NT)	22.12
	Total Disbursements	<u>\$ 26.52</u>

This is **Exhibit "I"** referred to in **Affidavit #1** of **H. Lance Williams**, sworn before me at Vancouver, British Columbia, this 18th day of August, 2026.



A Commissioner for taking Affidavits
for British Columbia



McCarthy Tétrault LLP
 Suite 2400, 745 Thurlow Street
 Vancouver, British Columbia
 V6E 0C5
 Tel: 604-643-7100
 Fax: 604-643-7900

FTI Consulting Canada Inc.
 900 West Hastings Street
 Suite 500
 Vancouver, BC V6C 1E5

Invoice No: 8618013
 GST/HST Reg. No: 116532839
 Date: July 30, 2026

Attention: Tom Powell
 Senior Managing Director

FTI Consulting Canada Inc.
 Reference: Maskeen (Carvolth) GP Inc., et al
 207091-607950

For Professional Services Rendered for the period ending June 30, 2026

OUR FEES			\$	1,517.00
Disbursements	Non-Taxable	\$	0.00	
	Taxable		61.63	61.63
			\$	1,578.63
GST	Fees	\$	75.85	
	Disbursements		3.08	78.93
PST (BC)	Fees	\$	106.19	106.19
TOTAL DUE ON ABOVE-NOTED MATTER			\$	1,763.75

McCarthy Tétrault LLP

DocuSigned by:

 0B38D88CABCB430...
 Lance Williams

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 Re: Maskeen (Carvolth) GP Inc., et al
 207091-607950

Invoice No. 8618013
 Page No. 2

FEE DETAIL

<u>Date</u> (dd/mm/yy)	<u>Timekeeper</u> <u>Initials</u>	<u>Hours</u>	<u>Description</u>
02/06/26	THF	0.40	Emails with respect to executed statutory rights of way; coordinate delivery of originals.
03/06/26	LWI	0.20	Correspond re payout matters.
04/06/26	GH2	0.20	Email to L. Williams re parcel activity notification.
05/06/26	THF	1.00	Review and comment on draft purchase agreement; emails with respect to same.
23/06/26	PWI	0.20	Draft extension letter.
26/06/26	THF	0.10	Email with respect to proposed amendment to purchase agreement.

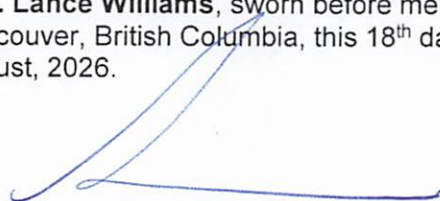
FEE SUMMARY

<u>Timekeeper Name</u>	<u>Hours</u>
Fox, Thomas	1.50
Grewal, Harleen	0.20
Williams, Lance	0.20
Williams, Patrick	0.20
	<u>2.10</u>

DISBURSEMENT SUMMARY

<u>Taxable Y/N</u>	<u>Description</u>		<u>Total Cost</u>
Y	Courier / Messenger	\$	61.63
	Total Disbursements	\$	<u>61.63</u>

This is **Exhibit "J"** referred to in **Affidavit #1** of **H. Lance Williams**, sworn before me at Vancouver, British Columbia, this 18th day of August, 2026.



A Commissioner for taking Affidavits
for British Columbia



Lance Williams

Partner

[Vancouver](#)

[Toronto](#)

lwilliams@mccarthy.ca

[+1 604-643-7154](tel:+16046437154)

[+1 416-601-8484](tel:+14166018484)

Bar Admissions

Alberta, 2007

Saskatchewan, 2007

British Columbia, 2008

Yukon, 2015

Ontario, 2025

Law School

University of Saskatchewan

York University

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With experience crafting bespoke arrangements in complex bankruptcy and insolvency mandates, Lance turns restructuring into an opportunity for businesses to chart a new course.

Lance Williams* is a partner in our Bankruptcy & Restructuring Group who specializes in the area of commercial insolvency and is highly recognized in the market. His practice includes advising and representing trustees, debtors, directors, and creditors on complex insolvency and restructuring issues including debt restructuring, corporate reorganizations, loan workouts, fraudulent preference actions, foreclosures, bankruptcies and receiverships. Lance is frequently involved in proceedings pursuant to the Companies' Creditors Arrangement Act, the Bankruptcy and Insolvency Act, the Canada Business Corporations Act, and other provincial corporate statutes. He has particular experience regarding restructurings involving mining, cannabis, forestry, oil & gas, retail, real estate, technology and agriculture.

Lance has acted on numerous cross-border and multi-jurisdictional restructurings, and is widely recognized for his international restructuring experience. Lance is a Fellow of the INSOL International, a designation granted to a limited number of practitioners who have undertaken extensive study and examination on cross-border insolvency law and practice. Lance is an active member of the invitation-only International Insolvency Institute, where he is an active speaker and a member of the delegation committee to Working Group V (International Insolvency) of the United Nations Commission on International Trade (UNCITRAL). He is also a member of the invitation-only

Insolvency Institute of Canada, consisting of Canada's leading insolvency professionals.

Lance also provides strategic advice in corporate and commercial finance, advising borrowers and lenders on domestic and multi-jurisdictional loans. Clients have included borrowers, private lenders, financial institutions, mezzanine lenders and distressed lenders on asset-backed loans, real estate financing, acquisition financing, debtor-in-possession (DIP) financing and syndicated loans. This interdisciplinary toolkit gives him unique insight into negotiations and allows him to provide consistent, nuanced, and strategic advice on clients' most novel challenges.

Lance received a Bachelor of Commerce with Distinction from the University of Alberta in 2004 and his law degree from the University of Saskatchewan in 2006. He completed a Masters of Laws (LL.M) in 2016 at York University's Osgoode Hall Law School. He was called to the Alberta and Saskatchewan bars in 2007, the British Columbia bar in 2008 and the Yukon bar in 2015, and he is a member of those provinces respective law societies.

Publications & Insights

- Yukon Court of Appeal Clarifies Environmental Security and Third-Party Property Rights in Receivership Proceedings, (2021)
- Caught in the Rye: The Canada Grain Act, Security, Title and Insolvency Proceedings, Annual Review of Insolvency Law, (2020)
- To Vest, or Not to Vest? Royalties and the Court's Power to Extinguish Third-party Interests in Land Through a Vesting Order, (2019)
- Re-ordering Priorities: A Review of Recent Jurisprudence Regarding the Categorization of Debt vs. Equity and Equitable Subordination, Insolvency Institute of Canada, (2019)
- Substance Over Form? A Review of the Evolving Practice of Approving the Fees of Court Officers, Annual Review of Insolvency Law, (2016)

- Is That My Receivable? Annual Review of Insolvency Law, (2016)
- TLC The Land Conservancy of Canada: The Evolution of the Role of "Other" Interests in Companies' Creditors Arrangement Act Proceedings, Annual Review of Insolvency Law, (2015)
- New Developments in Receivership Law: A Survey, Insolvency Institute of Canada, (2012)

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INSOL Fellowship

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Experience

Vantage Group Enters Into Credit Agreement With Syndicate of Domestic and International Lenders

October 31, 2025

Minglian Holdings Ltd. and 0882892 B.C. Ltd.'s Creditor-led CCAA proceeding

October 6, 2025

Bankruptcy of Lightstone Development Ltd.

July 31, 2025

Interfor Corporation amends and extends its existing syndicated credit facilities with syndicate of major Canadian and U.S. banks for C\$560M

July 28, 2025

Catalyst Metals obtains a AUD\$110M revolving credit facility

July 23, 2025

Cross-border DIP financing for Oak and Fort CCAA and Chapter 15 proceedings on behalf of lender group

June 6, 2025

**Driving Forward: Key Takeaways From the 16th Anniversary
Edition of McCarthy Tétrault's Annual Retail and Consumer
Markets Summit**

March 2, 2026

Private Equity Outlook 2023 - Top Ten Takeaways

February 24, 2023

On Target: 2023 Private Equity Outlook

January 10, 2023

Mining in the Courts, Vol. XII

April 5, 2022

Events

Private Equity Outlook Webinar 2023

February 14, 2023

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