



This is Affidavit #3 of
H. Lance Williams, in this case
and was made on December 4, 2020

District of British Columbia
Division No. 03 – Vancouver
Court No. B-180368
Estate No. 11-2375063

IN THE SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY AND INSOLVENCY

IN THE MATTER OF THE BANKRUPTCY OF
JIZHE YANG

IN THE MATTER OF THE RECEIVERSHIP OF
PE CONSULTING LTD.

A F F I D A V I T

I, **H. Lance Williams**, lawyer, of 2200 – 885 West Georgia Street, Vancouver, British Columbia, SWEAR THAT:

1. I am a partner at Cassels Brock & Blackwell LLP ("**CBB**"), counsel for Ernst & Young Inc. ("**EYI**") in its capacity as the court appointed receiver (the "**Receiver**") of PE Consulting Ltd. 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 am one of the individuals at CBB that has had primary carriage of this proceeding.
3. Attached hereto and marked as indicated are the following Exhibits (together, the "**Invoices**" or the "**CBB Accounts**");

Exhibit	Invoice Number	Invoice Date	Amount
"A"	2114130	July 15, 2020	\$1,299.20
"B"	2115972	August 14, 2020	\$8,762.00
"C"	2120371	October 15, 2020	\$1,732.70
"D"	2122924	November 19, 2020	\$896.00
TOTAL:			\$12,689.90

4. As detailed in the Invoices, from July 15, 2020 to November 19, 2020, CBB's invoiced fees amounted to \$11,169.50 and CBB incurred and invoiced for disbursements in the amount of \$163.64 and taxes in the amount of \$1,356.76 for a total of \$12,689.90

5. The fees set out in the Invoices are calculated on the basis of the hours spent by CBB personnel, multiplied by the applicable standard hourly rates charged by CBB. The total time comprised in the Invoices is 30.3 hours at an average hourly rate of \$368.63 per hour ($\$11,169.50 \div 30.3$). 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, B.C.

6. This matter was primarily directed by the following counsel:

(a) **H. Lance Williams.** I have been a member of the CBB insolvency group since joining the firm as a partner in March, 2017. Prior to joining CBB, I was a member of the DLA Piper (Canada) LLP ("**DLAP**") insolvency group since joining DLAP as an associate in 2008. I became a partner of DLAP in 2014, and continued practicing in the DLAP insolvency group until joining CBB. 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 areas of commercial insolvency, including on numerous complex restructuring and receivership matters. I am listed in the Best Lawyers in Canada for insolvency and restructuring and the Canadian Legal Lexpert Directory for Financial Restructuring – Insolvency Litigation and Financial Restructuring – Financial 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 "E"** to this my Affidavit is a true copy of my *curriculum vitae* maintained by CBB.

(b) **Jared Enns.** Jared Enns joined CBB as an associate in May, 2017 and is a member of CBB's Advocacy and Restructuring and Insolvency groups. Jared's commercial litigation practice focuses on commercial lease disputes, shareholder and transactional litigation, contractual disputes and tort claims. His insolvency

practice focuses on bankruptcy proceedings, receiverships and commercial restructuring. Prior to joining Cassels Brock, Jared practiced at a Winnipeg-based firm and at a large, international firm in Vancouver. He has broad litigation experience, having appeared before the British Columbia Supreme Court, the Manitoba Court of Queen's Bench, the Manitoba Court of Appeal, and the Alberta Court of Appeal. Attached hereto and marked as **Exhibit "F"** to this my Affidavit is a true copy of Jared's *curriculum vitae* maintained by CBB.

7. 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.

8. I have reviewed the accounts of CBB and do verily believe that:

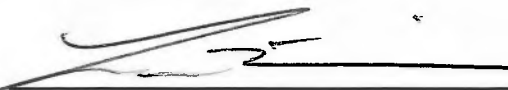
- (a) CBB's professional fees and disbursements have been properly incurred and are fair and reasonable in the circumstances;
- (b) the work completed by CBB was delegated to the appropriate professionals in CBB with the appropriate seniority and appropriate hourly rates;
- (c) CBB's fees in this matter 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 CBB in a prudent and economical manner.

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

SWORN BEFORE ME at Vancouver,
British Columbia, on December 4, 2020.



A Commissioner for taking Affidavits for
British Columbia


H. LANCE WILLIAMS

FORREST FINN

A Commissioner for Taking Affidavits
in British Columbia

Cassels Brock and Blackwell LLP
2200 - 885 West Georgia Street
Vancouver, B.C. V6C 3E8

Expiry

N/A

This is **Exhibit "A"** referred to in **Affidavit #3** of **H. Lance Williams**, sworn before me at Vancouver, British Columbia, on December 4, 2020.

A handwritten signature in black ink, appearing to read 'J. J. Finn', is written over a horizontal line.

A Commissioner for taking Affidavits
for British Columbia

Cassels

Attn: Holly Palmer
Ernst & Young Inc.
700 West Georgia Street
Vancouver, BC V7Y 1C7

Invoice No: 2114130
Date: July 15, 2020
Matter No.: 025522-00017
GST/HST No.: R121379572
PST No.: 1012-5078

Lawyer: Williams, H. Lance
Tel.: (604) 691-6112
E-mail: lwilliams@cassels.com

Re: PE Consulting Ltd.

Fees for professional services rendered up to and including June 30, 2020

Our Fees	1,160.00
GST @ 5.00%	58.00
PST @ 7.00%	81.20
TOTAL DUE (CAD)	1,299.20



We are committed to protecting the environment. Please provide your email address to payments@cassels.com to receive invoice and reminder statements electronically.

REMITTANCE ADVICE

Canadian Dollar EFT and Wire Payments:

Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1
Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
**Email payment details to
payments@cassels.com**

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Scotia Plaza, Suite 2100
40 King Street West
Toronto, Ontario, M5H 3C2
Canada

Invoice No: 2114130
Matter No.: 025522-00017
Amount: **CAD 1,299.20**

Payment due upon receipt. Please return remittance advice(s) with cheque

FEE DETAIL				
Date	Name	Description	Hours	
Jun-16-20	J. Enns	Review T&E application material and discuss same with the Receiver;	0.70	
Jun-17-20	J. Enns	Review issues with S. Towriss relating to closing of the sale of the property; review and finalize CPO application materials;	1.90	
Jun-23-20	J. Enns	Review revised Receiver's Report.	0.30	

FEE SUMMARY				
Name	Title	Hours	Rate	Amount
Enns, Jared	Associate	2.90	400.00	1,160.00
Total (CAD)		2.90		1,160.00

Our Fees	1,160.00	
GST @ 5.00%	58.00	
PST @ 7.00%	81.20	
TOTAL FEES & TAXES (CAD)		1,299.20

TOTAL FEES	1,160.00
TOTAL TAXES	139.20
TOTAL FEES & TAXES (CAD)	1,299.20

This is **Exhibit "B"** referred to in **Affidavit #3** of **H. Lance Williams**, sworn before me at Vancouver, British Columbia, on December 4, 2020.

A handwritten signature in black ink, appearing to read "G. Finn", is written over a horizontal line.

A Commissioner for taking Affidavits
for British Columbia

Cassels

Attn: Holly Palmer
Ernst & Young Inc.
700 West Georgia Street
Vancouver, BC V7Y 1C7

Invoice No: 2115972
Date: August 14, 2020
Matter No.: 025522-00017
GST/HST No.: R121379572
PST No.: 1012-5078

Lawyer: Williams, H. Lance
Tel.: (604) 691-6112
E-mail: lwilliams@cassels.com

Re: PE Consulting Ltd.

Fees for professional services rendered up to and including July 31, 2020

Our Fees	7,700.50
Disbursements	125.59
Total Fees and Disbursements	7,826.09
GST @ 5.00%	389.97
PST @ 7.00%	545.94
TOTAL DUE (CAD)	8,762.00



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REMITTANCE ADVICE

Canadian Dollar EFT and Wire Payments:

Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1
Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
Email payment details to
payments@cassels.com

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Scotia Plaza, Suite 2100
40 King Street West
Toronto, Ontario, M5H 3C2
Canada

Invoice No: 2115972
Matter No.: 025522-00017

Amount: CAD 8,762.00

Payment due upon receipt. Please return remittance advice(s) with cheque

FEE DETAIL			
Date	Name	Description	Hours
Jul-06-20	C. Fadden	Receive letter from R. Ellis enclosing executed Form C Release for Discharge of BMO Mortgage & Assignment of Rents; review file for next steps and seek instructions from Shauna Towriss;	0.30
Jul-09-20	C. Fadden	Follow-up on letter received letter from R. Ellis enclosing the original Form C Release for the discharge of BMO Mortgage and Assignment of Rents CA3233157-58; instructions to pull title for PID: 028-278-038 to confirm if mortgage and AOR have been discharged or not (not showing on title due to Court Order discharge);	0.30
Jul-14-20	J. Enns	Finalize application material for claims process order;	1.30
Jul-14-20	S. Danielisz	Revise and update affidavits of receiver and counsel regarding approval of fees; review and revise application materials and draft orders for July 29th hearing;	1.50
Jul-15-20	S. Danielisz	Finalize and assemble application materials for July 29th hearing; all related email communications;	1.30
Jul-16-20	S. Danielisz	Attend at court registry to file claims process and fee approval application materials; email to service list parties with filed application materials; prepare service letter to Canada Revenue Agency and arrange delivery; update e-pleadings;	1.50
Jul-24-20	S. Danielisz	Prepare Application Record and Book of Authorities (court copies) for claims process and fee approval hearing scheduled for July 29th;	1.80
Jul-27-20	S. Danielisz	Attend at court registry to submit Application Record for July 29th hearing (court's copy); prepare electronic copies of Application Record and Book of Authorities (counsel's copy);	1.80
Jul-28-20	J. Enns	Prepare for application regarding approval of Receiver's accounts and activities and claims process; extensive discussions with counsel to the Former Receiver regarding opposition to the relief sought, and discussions with the Receiver in connection therewith; draft proposal to resolve opposition to application; review correspondence from Former Receiver withdrawing proposed resolution; prepare for contested application;	3.90
Jul-28-20	L. Williams	Review of response materials; telephone call with counsel to former receiver;	0.50
Jul-29-20	J. Enns	Send correspondence to Former Receiver's counsel regarding opposition to relief sought at application; prepare for and attend application for fee approval and claims process; settlement discussions with Former Receiver's counsel and counsel to PTI; obtain claims process order and order approving fees and activities of the Receiver; discussions with the Receiver concerning application and discussions with the Former Receiver;	6.70
Jul-29-20	L. Williams	Correspondence and review of matters regarding opposition by former trustee;	0.30

Date	Name	Description	Hours
Jul-29-20	S. Danielisz	Submit July 29th Orders of Master Taylor for e-filing; receive filed Orders and circulate copies to service list parties.	0.40

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Williams, H. Lance	Partner	0.80	550.00	440.00
Enns, Jared	Associate	11.90	400.00	4,760.00
Danielisz, Sue	Law Clerk/ Paralegal	8.30	285.00	2,365.50
Fadden, Caroline	Law Clerk/ Paralegal	0.60	225.00	135.00
Total (CAD)		21.60		7,700.50

Our Fees	7,700.50	
GST @ 5.00%	385.03	
PST @ 7.00%	539.03	
TOTAL FEES & TAXES (CAD)		8,624.56

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

BC Land & Title - Searches, Certification	9.88
Court - Sundry	10.00
Litigation E-Filing	7.00
Total Non-Taxable Disbursements	26.88

Taxable Disbursements

BC Land & Title - Searches, Certification	1.65
Copies	70.50
West Law - Online Searches	26.56
Total Taxable Disbursements	98.71
GST @ 5.00%	4.94
PST @ 7.00%	6.91
Total Taxable Disbursements & Taxes	110.56

TOTAL DISBURSEMENTS & TAXES (CAD)	137.44
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TOTAL FEES	7,700.50
TOTAL DISBURSEMENTS	125.59
TOTAL TAXES	935.91
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	8,762.00

OUTSTANDING INVOICES				
Invoice Date	Invoice Number	Bill Amount	Payments / Credits	Balance Due
07/15/20	2114130	1,299.20	0.00	1,299.20
08/14/20	2115972	8,762.00	0.00	8,762.00
Total (CAD)		10,061.20	0.00	10,061.20

This is **Exhibit "C"** referred to in **Affidavit #3** of **H. Lance Williams**, sworn before me at Vancouver, British Columbia, on December 4, 2020.

A handwritten signature in black ink, appearing to read "J. Finn", is written over a horizontal line.

A Commissioner for taking Affidavits
for British Columbia

Cassels

Attn: Holly Palmer
Ernst & Young Inc.
700 West Georgia Street
Vancouver, BC V7Y 1C7

Invoice No: 2120371
Date: October 15, 2020
Matter No.: 025522-00017
GST/HST No.: R121379572
PST No.: 1012-5078

Lawyer: Williams, H. Lance
Tel.: (604) 691-6112
E-mail: lwilliams@cassels.com

Re: PE Consulting Ltd.

Fees for professional services rendered up to and including September 30, 2020

Our Fees	1,509.00
Disbursements	38.05
Total Fees and Disbursements	1,547.05
GST @ 5.00%	77.35
PST @ 7.00%	108.30
TOTAL DUE (CAD)	1,732.70



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REMITTANCE ADVICE

Canadian Dollar EFT and Wire Payments:

Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1
Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
Email payment details to
payments@cassels.com

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Scotia Plaza, Suite 2100
40 King Street West
Toronto, Ontario, M5H 3C2
Canada

Invoice No: 2120371
Matter No.: 025522-00017
Amount: **CAD 1,732.70**

Payment due upon receipt. Please return remittance advice(s) with cheque

FEE DETAIL				
Date	Name	Description	Hours	
Sep-10-20	J. Enns	Telephone call with PTI and Receiver to discuss various outstanding issues with respect to administration of estate;	0.70	
Sep-14-20	F. Finn	Correspond with counsel to T&E Holdings; review Order; review information production by BMO, RBC, and Scotiabank related to the Order;	0.70	
Sep-16-20	L. Williams	Review of claims process matters;	0.30	
Sep-18-20	J. Enns	Review proof of claim submitted by M. Yang and proof of claim of T&E; discuss proofs of claim and issues pertaining thereto with Receiver; review reasons for disallowance of M. Yang claim;	0.60	
Sep-23-20	J. Enns	Review issues pertaining to proofs of claim filed by Mary Yang and T&E Holdings; discussions with Trustee regarding proofs of claim; review and revise reasons for disallowance of Proof of Claim filed by Mary Yang and related discussions with the Trustee.	1.50	

FEE SUMMARY				
Name	Title	Hours	Rate	Amount
Williams, H. Lance	Partner	0.30	550.00	165.00
Enns, Jared	Associate	2.80	400.00	1,120.00
Finn, Forrest	Associate	0.70	320.00	224.00
Total (CAD)		3.80		1,509.00
Our Fees		1,509.00		
GST @ 5.00%		75.45		
PST @ 7.00%		105.63		
TOTAL FEES & TAXES (CAD)				1,690.08

DISBURSEMENT SUMMARY	
Taxable Disbursements	
Delivery	38.05
Total Taxable Disbursements	38.05
GST @ 5.00%	1.90
PST @ 7.00%	2.67
Total Taxable Disbursements & Taxes	42.62
TOTAL DISBURSEMENTS & TAXES (CAD)	42.62

TOTAL FEES	1,509.00
TOTAL DISBURSEMENTS	38.05
TOTAL TAXES	185.65
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	1,732.70

This is **Exhibit "D"** referred to in **Affidavit #3** of **H. Lance Williams**, sworn before me at Vancouver, British Columbia, on December 4, 2020.

A handwritten signature in black ink, appearing to read 'J. J. Finn', is written above a horizontal line.

A Commissioner for taking Affidavits
for British Columbia

Cassels

Attn: Holly Palmer
Ernst & Young Inc.
700 West Georgia Street
Vancouver, BC V7Y 1C7

Invoice No: 2122924
Date: November 19, 2020
Matter No.: 025522-00017
GST/HST No.: R121379572
PST No.: 1012-5078

Lawyer: Williams, H. Lance
Tel.: (604) 691-6112
E-mail: lwilliams@cassels.com

Re: PE Consulting Ltd.

Fees for professional services rendered up to and including October 31, 2020

Our Fees	800.00
GST @ 5.00%	40.00
PST @ 7.00%	56.00
TOTAL DUE (CAD)	896.00



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REMITTANCE ADVICE

Canadian Dollar EFT and Wire Payments:

Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1
Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
**Email payment details to
payments@cassels.com**

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Scotia Plaza, Suite 2100
40 King Street West
Toronto, Ontario, M5H 3C2
Canada

Invoice No: 2122924
Matter No.: 025522-00017
Amount: **CAD 896.00**

Payment due upon receipt. Please return remittance advice(s) with cheque

FEE DETAIL				
Date	Name	Description	Hours	
Oct-19-20	J. Enns	Review receivers' report; review issues pertaining to disputed Yang Claim and consider next steps; discuss next steps regarding Former Receiver's taxation application;	1.30	
Oct-21-20	J. Enns	Telephone call with Receiver to discuss timing of application for taxation of Former Receiver's accounts and settlement discussions;	0.40	
Oct-30-20	J. Enns	Draft correspondence to Former Receiver regarding without prejudice settlement meeting.	0.30	

FEE SUMMARY				
Name	Title	Hours	Rate	Amount
Enns, Jared	Associate	2.00	400.00	800.00
Total (CAD)		2.00		800.00

Our Fees	800.00	
GST @ 5.00%	40.00	
PST @ 7.00%	56.00	
TOTAL FEES & TAXES (CAD)		896.00

TOTAL FEES	800.00
TOTAL TAXES	96.00
TOTAL FEES & TAXES (CAD)	896.00

OUTSTANDING INVOICES				
Invoice Date	Invoice Number	Bill Amount	Payments / Credits	Balance Due
10/15/20	2120371	1,732.70	0.00	1,732.70
11/19/20	2122924	896.00	0.00	896.00
Total (CAD)		2,628.70	0.00	2,628.70

This is **Exhibit "E"** referred to in **Affidavit #3** of **H. Lance Williams**, sworn before me at Vancouver, British Columbia, on December 4, 2020.

A handwritten signature in black ink, appearing to read "J. J. Fenn", is written above a horizontal line.

A Commissioner for taking Affidavits
for British Columbia

Cassels



Lance Williams

Partner

Contact Information

604 691 6112

lwilliams@cassels.com

Office

Vancouver

Expertise

- Restructuring & Insolvency
- Banking & Specialty Finance

Biography

Lance Williams is a partner in the Banking & Specialty Finance Group, where he specializes in restructuring & insolvency and commercial finance. Lance has been involved in numerous significant insolvency files and commercial finance transactions in multiple jurisdictions. Lance's practice includes advising and representing trustees, debtors, directors and creditors on insolvency and restructuring issues including debt restructuring, corporate reorganizations, plans of arrangement, loan workouts, fraudulent preference actions, foreclosures, bankruptcies, and receiverships. Lance is frequently involved in proceedings pursuant to the *Companies' Creditors Arrangement Act* and the *Bankruptcy and Insolvency Act* and has particular experience regarding restructurings involving: technology and intellectual property, mining, forestry, cannabis, oil and gas, retail operations, real estate and agriculture. In commercial finance, Lance often advises borrowers and lenders on domestic and multi-jurisdictional loans. He acts for major financial institutions, mezzanine lenders and distressed lenders on asset-backed loan, real estate financing, acquisition financing, debtor-in-possession (DIP) financing and syndicated loans.

Lance's representative experience includes acting for:

Insolvency

- The court-appointed Monitor in the restructuring of the Ascent group of companies, Canada's first cannabis restructuring under the *Companies' Creditors Arrangement Act*
- A national coffee retailer and roaster in its successful restructuring, reorganization and recapitalization
- A prominent glass design manufacturer in its reorganization and integration into a prominent international manufacture
- The Government of the Northwest Territories in relation to the restructuring of North American Tungsten Corporation Ltd., a major tungsten mining operation in the Northwest Territories and Yukon

Commercial Finance

- Counsel to the syndicate lead in a \$100 million credit facility to a nationwide private mortgage lender
- Counsel to a Schedule I chartered bank on numerous large construction projects by a prominent construction company
- Counsel to a Schedule I chartered bank on credit facilities to a national private lender

As a member of the bars of British Columbia, Alberta, Saskatchewan and Yukon, Lance regularly advises clients on multi-jurisdictional matters and appears in the courts of British Columbia, Alberta, Saskatchewan and the Yukon.

Achievements

- *Best Lawyers in Canada* (Insolvency and Financial Restructuring)
- *Canadian Legal Lexpert Directory* (Insolvency & Financial Restructuring – Insolvency Litigation, Insolvency & Financial Restructuring – Financial Restructuring)
- Durward Thomas Prize in Civil Procedure (2006)

- *IFLR1000* (Restructuring & Insolvency)
- Jason Lang Memorial Scholarship (2002)
- *Expert Guide to the Leading US/Canada Cross-Border Corporate Lawyers in Canada* (Lawyer to Watch) (2017)
- *Expert Special Edition*, Litigation
- University of Alberta Entrance Scholarship (2000)

Recent Representative Work

- Stonebriar Commercial Finance Closes US\$685 Million Asset-Backed Securitization Transaction
- Sun Metals Completes \$6.15 Million Bought Deal Financing
- Canopy Growth Announces Acquisition of KeyLeaf Life Sciences
- Cassels Acts for HSBC Bank Canada in Connection with \$23.5 Million Credit Facility
- Stonebriar Commercial Finance Closes US\$650 Million Asset-Backed Securitization Transaction

Insights

- To Vest, or Not to Vest? Royalties and the Court's Power to Extinguish Third-party Interests in Land Through a Vesting Order

COVID-19 Insights

- Navigating Uncertainty: COVID-19 Guidance for the Cannabis Industry (Cassels Webinar)

Education / Bar Admissions

- LL.M., Osgoode Hall Law School, 2016
- J.D., University of Saskatchewan, 2006
- B.Com. (Hons.), University of Alberta, 2004
- Alberta, 2007
- Saskatchewan, 2007
- British Columbia, 2008
- Yukon, 2015

Associations

- Banking and Finance Law Review, Member, Editorial Board
- Canadian Bar Association
- Continuing Legal Education Society of British Columbia, Lecturer
- Insolvency Institute of Canada
- International Association of Restructuring, Insolvency and Bankruptcy Professionals (INSOL)
- Law Society of Alberta
- Law Society of British Columbia
- Law Society of Saskatchewan
- Turnaround Management Association (TMA)
- University of British Columbia Faculty of Law, Former Adjunct Professor

This is **Exhibit "F"** referred to in **Affidavit #3** of **H. Lance Williams**, sworn before me at Vancouver, British Columbia, on December 4, 2020.

A handwritten signature in black ink, appearing to read "J. J. Finn", is written over a horizontal line.

A Commissioner for taking Affidavits
for British Columbia

Cassels



Jared Enns

Associate

Contact Information

778 372 6787

jenns@cassels.com

Office

Vancouver

Expertise

- Restructuring & Insolvency
- Litigation

Biography

Jared Enns is an associate in the Litigation and Restructuring & Insolvency Groups at Cassels. Jared's commercial litigation practice focuses on commercial lease disputes, shareholder and transactional litigation, contractual disputes and tort claims. His insolvency practice focuses on bankruptcy proceedings, receiverships and commercial restructuring. Jared has broad litigation experience, having appeared before the British Columbia Supreme Court, the Manitoba Court of Queen's Bench and the Manitoba Court of Appeal. Outside of the office, Jared has devoted significant hours to pro bono work, working to further access to justice and LGBT rights within the legal profession and the broader community.

Prior to joining Cassels, Jared practiced at a Winnipeg-based firm and at a large, international firm in Vancouver.

Recent Representative Work

- Josemaria Resources Completes Spin-Out of Properties to NGEx Minerals

Insights

- Aboriginal and Regulatory Law – 2020 Update (Cassels Webinar)
- Alberta Court of Appeal Releases Anticipated Decision in Canada v Canada North Group Inc.
- Private Land Owners can Argue "Extinguishment" in Aboriginal Title Cases

Pro Bono & Community Involvement

- Legal Help Centre of Winnipeg, Former Supervising Lawyer (2015-2016)
- Manitoba Bar Association, Co-Chair, Sexual Orientation and Gender Identity Chapter (2016)
- Our Own Health Centre, Former Board Member (2016)
- Pride Winnipeg Festival, Counsel (2016)
- Pro Bono Students Canada, Supervising Lawyer (2015-2016)

Education / Bar Admissions

- J.D., University of Manitoba, 2014
- B.A., University of Manitoba, 2011
- Manitoba, 2015
- British Columbia, 2016

Associations

- Canadian Bar Association
- Law Society of British Columbia
- Manitoba Bar Association

District of British Columbia
Division No. 03 – Vancouver
Court No. B-180368
Estate No. 11-2375063

IN THE SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY AND INSOLVENCY

IN THE MATTER OF THE BANKRUPTCY OF
JIZHE YANG

IN THE MATTER OF THE RECEIVERSHIP OF
PE CONSULTING LTD.

A F F I D A V I T

CASSELS BROCK & BLACKWELL LLP
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