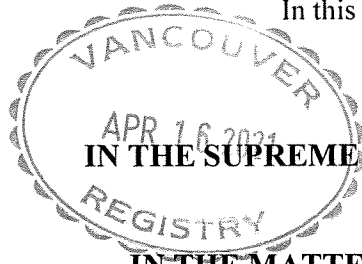


This is the 2nd affidavit of Gary D. Powroznik
In this case and was made on April 16th, 2021 Estate No. 11-254135
Court No. B-186288
Vancouver Registry



IN THE SUPREME COURT OF BRITISH COLUMBIA

**IN THE MATTER OF THE RECEIVERSHIP OF
MORNINGSTAR GOLF CLUB LTD.**

AFFIDAVIT IN SUPPORT OF RECEIVER-MANAGER'S REMUNERATION

I, Gary D. Powroznik, Licensed Insolvency Trustee and CIRP, of the City of Vancouver, do hereby make oath and say:

1. I am a Licensed Insolvency Trustee and Managing Director with G. Powroznik Group Inc. ("GPGI") of G-Force Group, who was appointed the Receiver-Manager ("**Receiver**") for Morningstar Golf Club Ltd. ("**Morningstar**") on June 1, 2018, and as such, am authorized to make this Affidavit in this proceeding, and 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. I make this Affidavit in support of an interim approval of the passing of the accounts of G. Powroznik Group Inc. in respect of the services provided by GPGI as Receiver of Morningstar during the period August 1, 2019 through to March 31, 2021.
3. In support of the passing of the accounts, I prepared the Second Report of the Receiver, dated April 15, 2021, that provides details of its investigations, findings, activities and results of its administration and operations during the Receivership and the challenges it faced. The facts and matters in these reports are within my own knowledge true.
4. In support of the passing of the accounts, the Receiver's Statement of Receipts and Disbursements for its HSBC Account for the Period June 1, 2018 to March 31, 2021 included in the Second Report as Appendix "H". The facts and matters referred to in the Receiver's Statements of Receipts and Disbursements are true and accurate in all material respects.
5. In support of the passing of the accounts, the Receiver's Statement of Receipts and Disbursements for its Operations Account for the Period June 1, 2018 to March 31, 2021 included in the Second Report as Appendix "I". The facts and matters referred to in the Receiver's Statements of Receipts and Disbursements are true and accurate in all material respects.
6. In support of the passing of the accounts, the Statements of Fees, Disbursements and Taxes for the Period August 1, 2019 to March 31, 2021, included in the Receiver's Second Report as Appendix "J" (the "**Receiver's Accounts**"). The Receiver's Accounts at Appendix "J"

are true and accurate and reflect the attendances made on this Estate. The Receiver's Accounts represent total fees of \$606,757.90, disbursements of \$14,720.51 and taxes of \$30,940.66 incurred in the administration of the Receivership.

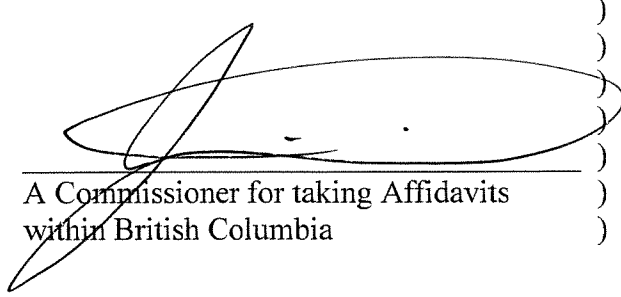
7. The Receiver's Accounts at Appendix "J" include a true and accurate account of each time entry reflecting the actual time spent by each of the Receiver's staff in preparation for and on the administration of the Receivership.
8. In support of the passing of accounts, a Summary of the Receiver's Time and Fees for the Period August 1, 2019 to March 31, 2021 is included in the Receiver's Second Report as Appendix "K" ("**Receiver's Time and Fee Analysis**"). The Receiver's total fees relate to 1599.10 hours of time spent by the Receiver's engagement team members at their standard hourly charge out rates for an average blended hourly rate of \$379.44. In my experience the Receiver's normal hourly rates are significantly lower than many of the larger firms, who perform similar complex commercial insolvencies in the British Columbia market due to its low overhead structure and use of experienced industry and insolvency professionals on a seamless basis. Although the Receiver has accounts due from as early as September 2019, it has not charged any interest.
9. The Receiver's statutory obligations have been complied with.
10. The Second Report describes the activities, administration, strategy and results of the Receiver's activities, the challenges it has faced in the Receivership and its communications with the two primary secured creditors.
11. I verily believe that all of the time and disbursements incurred by the Receiver with respect to the planning and administration of the Receivership and restructuring and improving Morningstar's operations and assets were in the best interests of all the creditors and that they were properly and necessarily incurred in order to protect the interests of the creditors and in respect of the assets administered by the Receiver and the Receiver's other statutory duties.

Experience and Qualifications

12. I led the activities for the Receiver for the Morningstar Receivership and drew on the Receiver's staff who have had previous experience on other files with similar businesses, assets, restructuring of operations and realization of going-concern assets compared to Morningstar.
13. I have been practicing in the corporate restructuring and commercial insolvency practices for over forty years. I received my Trustee's license in 1978 and later managed one of the largest corporate insolvency practices in Canada with Coopers & Lybrand ("**Coopers**") in Vancouver prior to its merger with Price Waterhouse in 1998 to form PwC. I was a partner for 27 years at Coopers and PwC before founding G-Force Group in 2008. G-Force Group is a boutique that includes GPGI, that specializes in workouts/restructuring of businesses, commercial insolvencies and distress Mergers & Acquisitions. Many of the senior

professional resources of G-Force Group have worked with me in my practices in Coopers and PwC.

SWORN BEFORE ME at Vancouver)
British Columbia on April 16th 2021)



A Commissioner for taking Affidavits
within British Columbia)



Gary D. Powroznik

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