



This is the 3rd affidavit
of Colin Brousson in this case
and was made on June 21, 2021

No. S186288
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

REALCOR MORTGAGE CORP.

PETITIONER

AND:

MORNINGSTAR GOLF CLUB LTD.
CANADIAN WESTERN BANK
NATIONAL LEASING GROUP INC.
ROYNAT INC.
ICE CUBE LEASING INC.

RESPONDENTS

AFFIDAVIT

I, **COLIN D. BROUSSON**, Barrister and Solicitor, of 2800 Park Place, 666 Burrard Street, in the City of Vancouver, in the Province of British Columbia, MAKE OATH AND SAY AS FOLLOWS:

1. I am a lawyer at DLA Piper (Canada) LLP and have acted as counsel to G. Powroznik Group Inc., the Receiver of Morningstar Golf Club Ltd., (the "**Receiver**"), 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. Initially, Gowling WLG (Canada) LLP ("**Gowling WLG**") acted as counsel to the Receiver until on or about August 16, 2020, when I left Gowling WLG and joined the law firm of DLA Piper (Canada) LLP ("**DLA**"). The Receiver chose to have DLA represent the Receiver thereafter.

3. The accounts of DLA issued to the Receiver for service from March 1, 2021 to April 3, 2021 can be summarized as follows:

Invoice Period	Total	Fees	Disbursements	Taxes
March 1, 2021- March 31, 2021	\$1,092.00	\$975.00	\$0.00	\$117.00
April 1, 2021 - April 30, 2021	\$64,053.79	\$56,977.50	\$231.40	\$6,844.89
Totals:	\$65,145.79	\$57,952.50	\$231.40	\$6,961.89

4. The fees and disbursements set out above were necessarily incurred in fulfilling the instructions of the Receiver and have been approved by the Receiver.

5. The services comprised in the accounts of DLA set out above relate to:

- (a) reviewing and revising Receiver's reports;
- (b) drafting Notice of Application and Affidavits in support of Court application;
- (c) preparing submissions and attending in Court on application;
- (d) correspondence and communication with the Receiver and other parties involved in the receivership;
- (e) drafting and negotiating Purchase and Sale Agreement for golf course;
- (f) reviewing and commenting on Development Cooperation Agreement; and
- (g) advising on easements, land swaps, applications for zoning and other real estate related matters.

6. The total cumulative time comprised in the accounts of DLA is approximately 123.8 hours broken down as follows:

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Client Matter No. 074081-00004

CDB/day