



This is the 1st affidavit
of Arad Mojtahedi in this case
and was made on January 21, 2025

No. S-238711
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN

CANADIAN WESTERN BANK

PETITIONER

AND

QUARRY ROCK DEVELOPMENTS (MCALLISTER) INC., QUARRY ROCK DEVELOPMENTS
(MCALLISTER) LIMITED PARTNERSHIP, LAWSON ACQUISITIONS LTD., WILLIS
DEVELOPMENTS INC., AND QUARRY ROCK DEVELOPMENTS INC.

RESPONDENTS

AFFIDAVIT

I, Arad Mojtahedi, of 2700 – 1133 Melville Street, Vancouver, British Columbia, Lawyer,
AFFIRM THAT:

1. I am a lawyer at DLA Piper (Canada) LLP ("**DLA**"), counsel to Alvarez & Marsal Canada Inc., court appointed Receiver and Manager of Quarry Rock Developments (McAllister) Inc. and Quarry Rock Developments (McAllister) Limited Partnership (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 for service from April 1, 2024 to December 31, 2024 can be summarized as follows:

Invoice Period	Fees	Disbursements	Taxes	Total
April 1, 2024 – April 30, 2024	\$7,040.00		\$844.80	\$7,884.80
May 1, 2024 – May 31, 2024	\$7,825.00	\$38.48	\$939.20	\$8,802.68
June 1, 2024 – June 30, 2024	\$8,449.00	\$134.68	\$1,014.58	\$9,598.26

July 1, 2024 – July 31, 2024	\$2,015.00		\$241.80	\$2,256.80
August 1, 2024 – August 31, 2024	\$600.00		\$72.00	\$672.00
September 1, 2024 – October 31, 2024	\$1,190.00		\$142.80	\$1,332.80
November 1, 2024 – November 30, 2024	\$58,908.00	\$714.32	\$7,084.36	\$66,706.68
December 1, 2024 – December 31, 2024	\$7,605	\$192.50	\$914.23	\$8,711.73
TOTAL:	\$93,632.00	\$1,079.98	\$11,253.77	\$105,965.75

3. The fees and disbursements set out above were necessarily incurred in fulfilling the instructions of the Receiver and have been approved by the Receiver.
4. In addition to the above fees, between January 1, 2025 and today, DLA has incurred approximately \$10,000 in fees, taxes and disbursements and estimates a further amount of \$16,800 in fees, taxes and disbursements to complete these receivership proceedings and any ancillary works in connection with a potential bankruptcy of the Debtors.
5. The services comprised in the accounts of DLA set out above relate to:
 - (a) reviewing and revising the Receiver's reports;
 - (b) assisting the Receiver on matters related to the sales process;
 - (c) drafting the service agreement between the Receiver and VC Management Inc. in respect of ongoing site monitoring and maintenance;
 - (d) reviewing various legal documents, including various offers to purchase and the additional bids received pursuant to PD-62;
 - (e) preparing for and attending in Court on applications, including the sale approval application, which was opposed by various parties;
 - (f) correspondence and communication with the Receiver and other parties involved in the receivership; and
 - (g) reviewing and opining on the validity of Canadian Western Bank's security over the Debtors' assets.

6. The total cumulative time comprised in the accounts of DLA as of December 31, 2024 is approximately 154 hours broken down as follows:

Lawyer	Rate	Hours
Colin D. Brousson	\$900	60.3
Samantha Arbor	\$400	15.8
Dannis Yang	\$100	3.1
Richard Lord	\$675	10.1
Arad Mojtahedi	\$600	63.4
Catherine Spaa	\$300	1.3
	Total:	154

7. The legal advice and services were rendered to the Receiver at 925 W Georgia St Suite 902, Vancouver, British Columbia.
8. I was called to the Bar and admitted to the *Barreau* of the Province of Quebec in 2016. I was later called to the Bar and admitted to the Law Society of British Columbia in 2024. Since 2016, I 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 Annual Review of Insolvency Law and other groups.

AFFIRMED BEFORE ME at Vancouver,
British Columbia, on January 21, 2025

A Commissioner for taking Affidavits for
British Columbia.

ARAD MOJTAHEDI

Jeffrey Bradshaw
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ROCK DEVELOPMENTS INC.

RESPONDENTS

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