

No. S236214
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:
1392752 B.C.LTD.

PETITIONER

AND:
SKEENA SAWMILLS LTD., SKEENA BIOENERGY LTD.,
ROC HOLDINGS LTD.

RESPONDENTS

LIST OF DOCUMENTS

Prepared by: The Petitioner, 1392752 B.C. Ltd. (the “**Listing Party**”)

**Part 1: DOCUMENTS THAT ARE OR HAVE BEEN IN THE LISTING PARTY’S
POSSESSION OR CONTROL AND THAT COULD BE USED BY ANY
PARTY AT TRIAL TO PROVE OR DISPROVE A MATERIAL FACT**

1. Please see the attached **Schedule “A”**.

**Part 2: OTHER DOCUMENTS TO WHICH THE LISTING PARTY INTENDS TO
REFER AT TRIAL**

N/A

**Part 3: DOCUMENTS THAT RELATE TO A MATTER IN QUESTION IN THE
ACTION**

1. Emails from July 14, 2022 through August 6, 2022 among Skeena Sawmills Ltd. and MNP Ltd.

**Part 4: DOCUMENTS FOR WHICH PRIVILEGE FROM PRODUCTION IS
CLAIMED**

The Listing Party objects to production of the documents described in this part on the grounds that they are privileged. Paragraphs (a), (b) and (c) below describe the three categories of privilege in relation to the documents listed in this Part. A reference to (a), (b) or (c) next to the

listing indicates the ground or grounds of privilege claimed in relation to the specific document or group of documents.

GROUND OF PRIVILEGE

Solicitor/Client Privilege

- (a) The documents are or record confidential communications between the Listing Party or their agents and the Listing Party's legal advisors for the purpose of obtaining legal advice or assistance.

Litigation Privilege

- (b) The documents are or record confidential communications between the Listing Party or their agents and the Listing Party's legal or professional advisors made for the dominant purpose of litigation at a time when litigation was contemplated or commenced; or

The documents are or record confidential communications between the Listing Party's legal or professional advisors, or between those legal or professional advisors and third parties, or between the Listing Party and third parties, made for the dominant purpose of litigation at a time when litigation was contemplated or commenced; or

The documents were prepared or brought into being by the Listing Party or its legal or professional advisors, or are copies of documents obtained from other parties or sources, for the dominant purpose of litigation at a time when litigation was contemplated or commenced.

Settlement Negotiation Privilege

- (c) The documents are or record confidential communications between the Listing Party, their agents, or their legal advisors and the opposing party, their agent, or their advisors for the purpose of negotiating a settlement of an issue or issues between them.

No.	Date of Document	Description of Document	Grounds on which privilege is claimed	Indicate, for each document listed in this Part by way of an amendment to this List of Documents under Rule 7-1(9), (12) or (14), the date on which the document was listed
4.1	Various	Correspondence between the Listing Party and counsel.	(a) and (b)	

ONGOING CLAIM OF SOLICITOR/CLIENT, LITIGATION PRIVILEGE AND SETTLEMENT NEGOTIATION PRIVILEGE

The Listing Party also claims privilege over documents created or coming into the Listing Party's or the Listing Party's solicitors possession after the date of this List of Documents in the following categories:

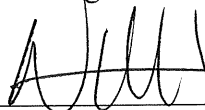
1. Documents consisting of or recording confidential communications between the Listing Party and the Listing Party's legal advisors for the purpose of giving the Listing Party legal advice in the context of this action;
2. Documents coming into being, prepared or coming into the possession of the Listing Party or their legal advisors, for the dominant purpose of this litigation, including drafts or pleadings, proofs of evidence, cases for the opinion of counsel, opinions of counsel and instructions to counsel prepared and given in anticipation and during the progress of this action, letters and copies of letters passing between the Listing Party and the Listing Party's counsel and memoranda made by the Listing Party's solicitors and the Listing Party's agents and experts for the purpose of defending/prosecuting the action (and prosecuting the counterclaim herein); and
3. Documents consisting of or recording confidential communications between the Listing Party, their agents, or their legal advisors and the opposing party, their agent, or their advisors for the purpose of negotiating a settlement of an issue or issues between them.

TAKE NOTICE that the documents listed in Parts 1, 2 or 3 of this List of Documents that are not shown as no longer being in the Listing Party's possession or control may be inspected and copied, during normal business hours, at the offices of Lawson Lundell LLP, at 1600 – 925 West Georgia Street, Vancouver, British Columbia V6C 3L2.

Dated: January 5, 2024

Implied undertaking to the court

Documents produced are not to be used by the other party(ies) except for the purposes of this litigation unless and until the scope of the undertaking is varied by a court order or other judicial order, consent or statutory override or a situation of immediate and serious danger emerges. This implied undertaking continues despite settlement or completion of the litigation.



 Lawson Lundell LLP
 Solicitors for the Listing Party, the
 Defendants

This List of Documents is delivered by Peter J. Roberts, of the law firm of Lawson Lundell LLP, whose place of business and address for delivery is 1600 – 925 West Georgia Street, Vancouver, British Columbia V6C 3L2.

SCHEDULE "A"

Description	Date
Promissory Note to X. Cui and S. Wu from ROC Holdings Ltd.	January 24, 2023
Promissory Note to X. Cui and S. Wu from Skeena Sawmills Ltd.	January 24, 2023
Promissory Note to X. Cui and S. Wu from Skeena Bioenergy Ltd.	January 24, 2023
Promissory Note to X. Cui and S. Wu from Bright Future International Trading Ltd.	January 24, 2023
Deed of Gift	January 26, 2023
Receipt	January 26, 2023
Acknowledgment – ROC Holdings Ltd.	January 26, 2023
Acknowledgment – Skeena Sawmills	January 26, 2023
Acknowledgment - Skeena Bioenergy Ltd.	January 26, 2023
Acknowledgment – Bright Future International Trading Ltd.	January 26, 2023
Purchase and Sale Agreement	January 26, 2023
Resolution of the Directors	January 26, 2023
Subscription	January 26, 2023
Non-Transferable Written Acknowledgment	January 26, 2023
Receipt	January 26, 2023
Promissory Note to Cui Family Trust from 1392752 BC Ltd.	January 26, 2023
Promissory Note to 1392752 BC Ltd. from ROC	January 26, 2023
Promissory Note to 1392752 BC Ltd. from Skeena Sawmills	January 26, 2023
Promissory Note to 1392752 BC Ltd. from Skeena Bioenergy	January 26, 2023
Demand Letter – ROC	January 26, 2023
Demand Letter – Skeena Sawmills	January 26, 2023
Demand Letter – Skeena Bioenergy	January 26, 2023
Proof of Delivery	January 26, 2023
Promissory Note to 1392752 BC Ltd. from ROC	January 31, 2023
Promissory Note to 1392752 BC Ltd. from Skeen Sawmills	January 31, 2023
Promissory Note to 1392752 BC Ltd. from Skeena Bioenergy	January 31, 2023

Description	Date
Certificate of ILA – Skeena Sawmills	January 31, 2023
Certificate of ILA – Skeena Bioenergy	January 31, 2023
Certificate of ILA – ROC	January 31, 2023
Officer's Certificate – ROC	January 31, 2023
Resolutions – ROC	January 31, 2023
Officer's Certificate – Skeena Sawmills	January 31, 2023
Resolutions – Skeena Sawmills	January 31, 2023
Officer's Certificate – Skeena Bioenergy	January 31, 2023
Resolutions – Skeena Bioenergy	January 31, 2023
Forbearance Agreement	January 31, 2023
Form B – Mortgage – <i>Executed and filed copies</i>	January 31, 2023 / February 1, 2023
General Assignment of Leases and Rents	January 31, 2023
General Security Agreement – ROC	January 31, 2023
General Security Agreement –Skeena Sawmills	January 31, 2023
General Security Agreement – Skeena Bioenergy	January 31, 2023
Joint and Several Guarantee	January 31, 2023
Promissory Grid Note – ROC	January 31, 2023
Promissory Grid Note – Skeena Sawmills	January 31, 2023
Promissory Grid Note –Skeena Bioenergy	January 31, 2023