

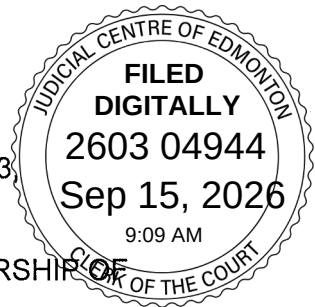
COURT FILE NUMBER 2603-04944

COURT COURT OF KING'S BENCH OF ALBERTA
IN BANKRUPTCY AND INSOLVENCY

JUDICIAL CENTRE EDMONTON

IN THE MATTER OF THE *BANKRUPTCY
AND INSOLVENCY ACT*, RSC 1985, C B-3,
as amended

AND IN THE MATTER OF THE RECEIVERSHIP OF
2597427 ALBERTA LTD.



DOCUMENT **FEE AFFIDAVIT**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
DLA Piper (Canada) LLP
Suite 1000, Livingston Place West
250 – 2nd Street SW
Calgary, Alberta
T2P 0C1
Telephone (403) 776-8819
Facsimile: (403) 296-4474
Email: anthony.mersich@ca.dlapiper.com

Attention : Anthony Mersich

AFFIDAVIT OF: ANTHONY MERSICH

SWORN ON: September 14, 2026

I, **ANTHONY MERSICH**, of the City of Calgary, in the Province of Alberta, SWEAR AND SAY THAT:

1. I am counsel with DLA Piper (Canada) LLP ("**DLA**"). DLA has been engaged by AlixPartners Restructuring, Inc. (formerly KSV Restructuring Inc.) in its capacity as Court-appointed receiver and manager (in such capacity, the "**Receiver**") of the real property legally described as CONDOMINIUM PLAN 9022742L UNITS 1–34 INCLUSIVE; EXCEPTING THEREOUT ALL MINES AND MINERALS (the "**Lands**") and all of 2597427 Alberta Ltd.'s present and after-acquired goods, chattel paper, money, securities, documents of title, instruments, and intangibles located at, related to, or used in connection with the Lands. As such, I have personal knowledge of the matters hereinafter deposed to except where stated to be based upon information and belief, and where so stated I do verily believe the same to be true.

2. I am authorized by DLA to swear this affidavit on its behalf.
3. Capitalized terms not defined herein shall have the meaning ascribed to them in the Second Report of the Receiver dated September 14, 2026 (the "**Second Report**").
4. As described in more detail in the First Report, during the period from July 1, 2026 to August 31, 2026 (the "**Fee Period**"), DLA incurred fees and disbursements in the amount of \$35,387.13, including GST. Particulars of the work performed is provided in the invoices attached hereto and marked as **Exhibit "A"** (the "**DLA Invoices**").
5. Below is a table summarizing each of the DLA Invoices, including the total billable hours charged per DLA Invoice, the total fees charged per DLA Invoice and the average hourly rates charged per DLA Invoice. The average hourly rate charged by DLA across all DLA Invoices was \$615.10. DLA has provided a total of 53.3 hours of services in relation to these receivership proceedings during the Fee Period.

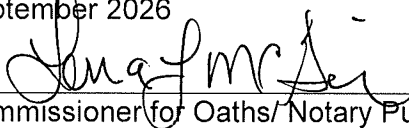
Date issued	Total Billable Hours	Fees	Disbursements	Taxes	Total	Avg. Hourly rate
Aug. 7, 2026	51.20	\$31,874.00	\$343.88	\$1,602.13	\$33,820.01	\$622.54
Sept. 9, 2026	2.5	\$1,492.50	\$0	\$74.63	\$1,567.13	\$597.00

6. Below is a chart summarizing the billing rate of each individual at DLA who has recorded time on this matter during the Fee Period:

Name and Title	Hourly Rate (\$)
Anthony Mersich, Counsel	\$665
Carole Hunter, Counsel	\$825
Craig Brusnyk, Partner	\$690
Sean Frederickm Associate	\$495
Madison Marquez-Stricker, Associate	\$415
Isaac Belland, Associate	\$400
Other & Administrative	\$325

7. To the best of my knowledge, the rates charged by DLA through the course of these proceedings are comparable to the rates charged by other firms in the Alberta market for the provision of similar services, and the rates charged by DLA for services rendered in similar proceedings.
8. It is my view that the fees and disbursements incurred by DLA are fair and reasonable in the circumstances.
9. I swear this affidavit in support of an application for, inter alia, approval of the fees and disbursements of DLA and for no other or improper purpose.

SWORN BEFORE ME at the City of Calgary, in)
 the Province of Alberta, this 14th day of)
 September 2026)


 Commissioner for Oaths/ Notary Public in and)
 for Alberta)



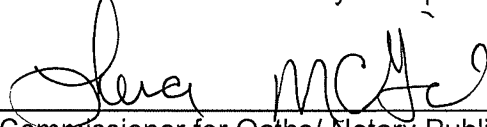
ANTHONY MERSICH

LENA LORRAINE McGUIRE
 A Commissioner for Oaths
 In and for the Province of Alberta
 My Commission Expires August 12, 2027

This is Exhibit "A"
to the Affidavit of

ANTHONY MERSICH

dated this 14th day of September 2026

A handwritten signature in black ink, appearing to read 'Lena McGuire', written over a horizontal line.

A Commissioner for Oaths/ Notary Public in and for Alberta

LENA LORRAINE McGUIRE

A Commissioner for Oaths
in and for the Province of Alberta
My Commission Expires August 12, 2027

**DLA Piper (Canada) LLP**

Suite 1000
250 2nd St SW
Calgary, AB
T2P 0C1

GST/HST#: 110152824
QST#: 1019882116

Anthony Mersich
T +1 403.776.8819

PRIVILEGED AND CONFIDENTIAL

KSV Restructuring Inc.
1165, 324 - 8th Avenue SW
Calgary, AB T2P 272

INVOICE #: 2459329
INVOICE DATE: August 7, 2026
MATTER NUMBER: 103454.00014

Attention: Jason Knight, Managing Director

Client Name: AlixPartners Restructuring, Inc.
Matter Name: Receivership of 2597427 Alberta Ltd.

For professional services rendered and/or disbursements advanced through July 31, 2026.

Total Fees	\$	31,874.00
Disbursements	\$	343.88
GST	\$	1,602.13
TOTAL THIS INVOICE	CAD \$	33,820.01

Accounts are due on receipt. Interest will be charged at a rate of 5% per annum on accounts that remain unpaid 30 days after date of invoice.
Please send remittance instructions to dlapiperpayments.canada@dlapiper.com

Payment via Credit Card

Visit <https://payments.dlapiper.ca> to make a payment
online using your credit card.

Tel: 604.643.2955
Toll Free: 1.833.299.9022

Payment via EFT/Wire

For Canadian Dollar wire payments
Canadian Imperial Bank of Commerce
400 Burrard Street
Vancouver, BC V6C 3A6
Account Name: DLA Piper (Canada) LLP
Bank Number: 010
Transit Number: 00010
Account No.: 2901315
Canadian clearing code: //CC001000010
Swift Code: CIBCCATT

US Dollar Wire Payments To
Canadian Imperial Bank of Commerce
400 Burrard Street
Vancouver, BC V6C 3A6
Account Name: DLA Piper (Canada) LLP
Account No.: 000100368016
ABA Routing No: 026005092
Swift Code: CIBCCATT

Intermediary Bank: Wells Fargo Bank, N.A.
Intermediary SWIFT: PNBUS3NNYC

Payment via Cheque

DLA Piper (Canada) LLP
1133 Melville St, Suite 2700
Vancouver, BC V6E 4E5 Canada

Please be sure to indicate invoice number with
your payment.

FEE DETAIL:

The following legal services were provided by DLA Piper (Canada) LLP:

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
07/01/26	Carole J. Hunter	Review, revise and finalize security opinion.	1.20	990.00
07/01/26	Anthony Mersich	Revsing application materials; email to counsel to ARH providing same.	2.40	1,596.00
07/02/26	Anthony Mersich	Revising application materials.	0.30	199.50
07/05/26	Anthony Mersich	Revising appliaction materials; final information requests to Recevier.	1.50	997.50
07/06/26	Anthony Mersich	Commissioning Fee Affidavit of J. Knight; attending to final revisions to First Report; attending to fee affidavit of A. Mersich; attending to filing and serving application materials.	2.20	1,463.00
07/07/26	Anthony Mersich	Responding to emails from ARH counsel regarding next steps for determining lien claim; email to M. Syed requesting any documents relating to lien claim; emails with ARH counsel regarding closing of sale transaction.	1.20	798.00
07/09/26	Craig W. Brusnyk	Telephone attendance with A. Mersich; conducted preliminary review of lien materials.	2.10	1,449.00
07/09/26	Anthony Mersich	Discussion with C. Brusnyk re lien claim analysis.	0.50	332.50
07/13/26	Anthony Mersich	Preparing for and attending sale approval application; revising forms of order; attending to filing of same.	5.40	3,591.00
07/13/26	Craig W. Brusnyk	Reviewed and considered agreements; invoices; correspondence; considered and evaluated construction liens; reviewed and considered relevant legislation; prepared draft memorandum.	6.00	4,140.00
07/14/26	Craig W. Brusnyk	Continued review and preparation of assessment; report to A. Mersich regarding results and memonradum.	6.20	4,278.00
07/14/26	Madison Marquez-Stricker	Proofread memo to court-appointed receiver; cross-referenced all calculations re the same; revised memo re the same; discussion with C. Brusnyk re the same.	0.40	166.00
07/17/26	Anthony Mersich	Emails regarding filed sale approval order.	0.30	199.50
07/17/26	Sean Frederick	Receipt of instructions from A. Mersich regarding closing real estate sale transaction; emails regarding same.	0.20	99.00
07/21/26	Tami Marks	Instructions from S. Frederick; review of Approval and Vesting Order and Agreement of Purchase and Sale; initial draft of sale documents.	0.90	292.50
07/21/26	Anthony Mersich	Disucssion with S. Frederick regarding closing.	0.40	266.00
07/21/26	Sean Frederick	Review purchase agreement; correspondence with A. Mersich regarding same; review vesting order; provide instructions to T. Marks	0.90	445.50
07/22/26	Anthony Mersich	Emails to Receiver regarding payment of municipal taxes.	0.20	133.00
07/23/26	Sean Frederick	Draft closing documents for sale transaction; review statement of adjustments and tax arrears matters; correspondence with T. Marks to coordinate closing items; request certified copy of approval and vesting order; draft letter to land titles office for registration of order; provide instructions to T. Marks regarding pre-closing matters; review draft trust letter and prepare revisions; further review of purchase agreement and vesting order; correspondence with A. Mersich regarding closing items.	5.70	2,821.50
07/24/26	Sean Frederick	Draft additional closing documents; revisions to trust letter; provide instructions to T. Marks; correspondence with A. Mersich and T. Marks; revisions to assignment of permits and contracts; review correspondence received from buyer's counsel.	1.30	643.50
07/24/26	Anthony Mersich	Reviewing memo re validity of construction lien; email to C. Brusnyk re same; reviewing PPCLA re same.	1.10	731.50
07/25/26	Anthony Mersich	Emails regarding statement of adjustments.	0.30	199.50
07/27/26	Sean Frederick	Coordinate pre-closing matters; minor updates to closing documents; revise trust letter; correspondence with T. Marks and A. Mersich; email	1.20	594.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
		to J. Knight providing closing documents for execution and summary comments.		
07/27/26	Anthony Mersich	Internal call re closing; call with J. Knight re flow of funds.	0.60	399.00
07/28/26	Tami Marks	Instructions from S. Frederick; sending trust package via email to counsel for the buyer.	0.20	65.00
07/28/26	Sean Frederick	Receipt and review of email correspondence; edits to land titles letter; edits to trust letter; receipt and review of signed documents received from client; coordinate documents and instructions to T. Marks; Correspondence with A. Mersich regarding closing matters; review final trust package	1.40	693.00
07/28/26	Craig W. Brusnyk	Considered additional questions; considered legislation; reviewed additional case law regarding definition of contractor and requirement for written agreement; report to A. Mersich.	2.50	1,725.00
07/28/26	Anthony Mersich	Emails regarding closing documents.	0.50	332.50
07/29/26	Sean Frederick	Coordinate pre-closing matters; provide instructions to T. Marks.	0.30	148.50
07/29/26	Anthony Mersich	Reviewing memo re construcion lien; email to ARH counsel re same.	0.80	532.00
07/30/26	Sean Frederick	Receipt and review of correspondence from buyer's counsel; coordinate matters regarding incoming funds and requirement for wire transfer.	0.20	99.00
07/30/26	Anthony Mersich	Attending to closing matters.	1.40	931.00
07/31/26	Sean Frederick	Attend to closing matters; provide instructions to T. Marks; correspondence with A. Mersich.	0.40	198.00
07/31/26	Tami Marks	Emails with client respecting closing and outstanding property taxes; truing of executed documents and circulation of same; emails with S. Frederick regarding closing.	1.00	325.00

TOTAL HOURS	51.20
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TOTAL FEES	\$31,874.00
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DISBURSEMENTS TAXABLE

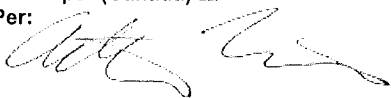
DESCRIPTION	AMOUNT
Courier	168.58
TOTAL TAXABLE DISBURSEMENTS	\$168.58

DISBURSEMENTS NON-TAXABLE

DESCRIPTION	AMOUNT
Corporate Charges - Non Taxable	7.30
Filing Fees - Non Taxable	133.00
Land Title Office Charges - Non Taxable	10.00
Wiring Charges	25.00
TOTAL NON-TAXABLE DISBURSEMENTS	\$175.30

If you have any questions or concerns regarding the enclosed, please do not hesitate to contact me.

Yours truly,
DLA Piper (Canada) LLP
Per:

A handwritten signature in black ink, appearing to read 'Anthony Mersich', written over a horizontal line.

Anthony Mersich

**DLA Piper (Canada) LLP**

Suite 1000
250 2nd St SW
Calgary, AB
T2P 0C1

GST/HST#: 110152824
QST#: 1019882116

Anthony Mersich
T +1 403.776.8819

PRIVILEGED AND CONFIDENTIAL

KSV Restructuring Inc.
1165, 324 - 8th Avenue SW
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INVOICE DATE: August 7, 2026
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Please send remittance instructions to dlapiperpayments.canada@dlapiper.com

Payment via Credit Card	Visit https://payments.dlapiper.ca to make a payment online using your credit card.	Tel: 604.643.2955 Toll Free: 1.833.299.9022
Payment via EFT/Wire	For Canadian Dollar wire payments Canadian Imperial Bank of Commerce 400 Burrard Street Vancouver, BC V6C 3A6 Account Name: DLA Piper (Canada) LLP Bank Number: 010 Transit Number: 00010 Account No.: 2901315 Canadian clearing code: //CC001000010 Swift Code: CIBCCATT	US Dollar Wire Payments To Canadian Imperial Bank of Commerce 400 Burrard Street Vancouver, BC V6C 3A6 Account Name: DLA Piper (Canada) LLP Account No.: 000100368016 ABA Routing No: 026005092 Swift Code: CIBCCATT Intermediary Bank: Wells Fargo Bank, N.A. Intermediary SWIFT: PNBUS3NNYC
Payment via Cheque	DLA Piper (Canada) LLP 1133 Melville St, Suite 2700 Vancouver, BC V6E 4E5 Canada	Please be sure to indicate invoice number with your payment.

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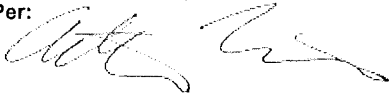
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Anthony Mersich