This is the 1st Affidavit
of Kibben Jackson in this case
and was made on November 5, 2026

No. S-267204
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

BANK OF MONTREAL

PETITIONER

AND:

CANSTAR RESTORATIONS LIMITED PARTNERSHIP, by its general partner CANSTAR RESTORATIONS GP INC., CANSTAR RESTORATIONS GP INC., and L.U.N.A RESTORATIONS INC.

RESPONDENTS

FEE AFFIDAVIT

I, Kibben Jackson, lawyer, of 2900 - 550 Burrard Street, Vancouver, British Columbia, SOLEMNLY AFFIRM THAT:

1. I am a lawyer at Fasken Martineau DuMoulin LLP ("**Fasken**"), counsel for AlixPartners Restructuring, Inc. ("**AlixPartners**"), in its capacity as court-appointed receiver and manager (the "**Receiver**") of the Respondents, and as such have personal knowledge of the facts hereinafter deposed to except where such facts are stated to be on information and belief, and in such cases I verily believe them to be true.

2. I am the lawyer at Fasken that has had primary carriage of this matter, and I am authorized to make this affidavit on behalf of Fasken in support of an application by the Receiver for, among other things, approval of the fees and disbursements of the Receiver and its counsel incurred in connection with these proceedings.

3. Attached hereto collectively as **Exhibit "A"** are copies of the covering pages for the following invoices (collectively, "**Fasken's Invoices**") issued by Fasken to AlixPartners. Fasken's Invoices show fees for services rendered and disbursements incurred in these proceedings for the period from September 1, 2026 up to and including October 31, 2026:

Invoice #	Invoice Date	Fees ($)	Disbursements ($)	GST/PST ($)	Total ($)
2336701	October 14, 2026	119,956.00	645.32	24,015.35	144,616.67
2346520	November 2, 2026	178,411.00	5,001.91	36,600.25	200,013.16
TOTAL		**$298,367.00**	**$5,647.23**	**$60,615.60**	**$344,629.83**

4. The detailed narratives have been omitted from Exhibit "A" to protect the Receiver's solicitor-client privilege, since the narratives include legal advice provided.

5. As detailed in Fasken's Invoices for the period from September 1, 2026 to October 31, 2026, Fasken invoiced fees amounting to $298,367.00, disbursements in the amount of $5,647.23, and taxes in the amount of $60,615.60, for a total of $344,629.83 (collectively, "**Fasken's Fees**").

6. Fasken's Fees as set out in Fasken's Invoices are calculated on the basis of the hours spent by Fasken personnel, multiplied by the applicable hourly rates charged by Fasken. Based on my experience as an insolvency lawyer in British Columbia, I believe that the standard hourly rates charged by Fasken are similar to those charged by other law firms for work of a similar nature and complexity in British Columbia.

7. Several lawyers and employees at Fasken expended time on this matter. Below is a summary of the time expended by each timekeeper listed on Fasken's Invoices and each timekeeper's hourly rate in this matter.

Timekeeper	Rate ($)	Hours	Total Fees ($)
Michael Coburn (partner)	1,200	0.30	360.00
Kibben Jackson (partner)	1,100	77.10	84,810.00
Dierk Ullrich (partner)	950	0.20	190.00
Brent Clark (partner)	950	5.60	5,320.00
Grant Foster (partner)	875	70.40	61,600.00
Jessica Cameron (partner)	800	126.80	101,440.00

Timekeeper	Rate ($)	Hours	Total Fees ($)
Andrew Burt (partner)	800	4.20	3,360.00
Tom Posyniak (partner)	740	8.30	6,142.00
Tiffany Bennett (associate)	640	24.10	15,424.00
Heidi Esslinger	560	0.40	224.00
Maddie Pugh (associate)	550	3.00	1,650.00
Chantelle deMontmorency (associate)	500	12.10	6,050.00
Suzanne Volkow (paralegal / law clerk)	470	1.60	752.00
Austin Minnings (student)	425	21.70	9,222.50
Queenie Chan (paralegal / law clerk)	425	1.30	552.50
Ankish Chawla (student)	375	0.90	337.50
Grace Siu (paralegal / law clerk)	370	0.6	222.00
Marnie Bailey (library services)	315	0.70	220.50
Fatima Qadiri (specialist, corporate)	250	0.20	50.00
Wenna Jumawid (corporate services)	200	2.20	440.00
TOTAL		**361.70**	**$298,367.00**

8. With respect to the lawyers who have been involved in this matter:

   (a) I am a member in good standing of the Law Society of British Columbia, called to the bar in 2001. I practice in the area of insolvency and restructuring and, as mentioned above, I was the lawyer at Fasken having primary conduct of this matter.

(b) Michael Coburm is a partner at Fasken. He was called to the bar in British Columbia in 2000 and practices in the area of tax. He is a member in good standing of the Law Society of British Columbia. He assisted with the transactional aspects of the receivership proceedings.

(c) Dierk Ullrich is a partner at Fasken. He was called to the bar in British Columbia in 2004 and practices in the area of corporate/commercial. He is a member in good standing of the Law Society of British Columbia. He assisted with the transactional aspects of the receivership proceedings.

(d) Brent Clark is a partner at Fasken. He was called to the bar in British Columbia in 2000 and practices in the area of banking and finance. He is a member in good standing of the Law Society of British Columbia. He assisted with conducting security reviews in connection with the Respondents.

(e) Grant Foster is a partner at Fasken. He was called to the bar in British Columbia in 2009 and practices in the area of corporate/commercial. He is a member in good standing of the Law Society of British Columbia. He assisted with the transactional aspects of the receivership proceedings.

(f) Jessica Cameron is a partner at Fasken. She was called to the bar in Alberta in 2013 and practices in the area of insolvency and restructuring. She is a member in good standing of the Law Society of Alberta.

(g) Andrew Burt is a partner at Fasken. He was called to the bar in Alberta in 2015 and practices in the area of banking and finance. He is a member in good standing of the Law Society of Alberta. He assisted with conducting security reviews in connection with the Respondents.

(h) Tom Posyniak is a partner at Fasken. He was called to the bar in British Columbia in 2014 and practices in the area of litigation and dispute resolution. He is a member in good standing of the Law Society of British Columbia. He assisted with matters relating to an appeal of the Transaction Approval and Reverse Vesting Order granted on October 9, 2026 in the receivership proceedings.

(i) Tiffany Bennett is an associate at Fasken. She was called to the bar in Alberta in 2019 and practices in the area of insolvency and restructuring. She is a member in good standing of the Law Society of Alberta.

(j) Heidi Esslinger is an associate at Fasken. She was called to the bar in British Columbia in 2022 and practices in the area of insolvency and restructuring. She is a member in good standing of the Law Society of British Columbia.

(k) Maddie Pugh is an associate at Fasken. She was called to the bar in Alberta in 2023 and practices in the area of banking and finance. She is a member in good standing of the Law Society of Alberta. She assisted with conducting security reviews in connection with the Respondents.

(l) Chantelle deMontmorency is an associate at Fasken. She was called to the bar in British Columbia in 2025 and practices in the area of real estate. She is a member in good standing of the Law Society of British Columbia. She assisted with conducting security reviews in connection with the Respondents.

9. In this matter, Fasken performed tasks typical of counsel to the Receiver, including: (a) reviewing and revising the Receiver's reports to Court; (b) negotiating and drafting agreements, including for the sale of the assets subject to the receivership proceeding; (c) preparing and filing materials in respect of the various applications brought in these proceedings; (d) attending those applications; (e) consulting on and advising with respect to legal issues arising in these proceedings generally; and (f) communicating with counsel to various creditors.

10. To the best of my knowledge, information and belief, the information contained in Fasken's Invoices is true and accurate in all respects as to:

(a) the number of hours worked;

(b) the nature of work performed;

(c) the identity of the individuals who performed work; and

(d) the rates charged for the work performed.

11. I have reviewed Fasken's Invoices and do verily believe that:

(a) Fasken's professional fees and disbursements were properly incurred and are fair and reasonable in the circumstances;

(b) the work was reasonable and necessary and completed at the request of the Receiver;

(c) the work completed by Fasken was delegated to the appropriate professionals with the appropriate seniority and hourly rates;

(d) Fasken's standard rates are consistent with the fees charged by similar firms with the capacity to handle a matter of comparable size and complexity;

(e) Fasken's Invoices were provided to the Receiver when rendered and all have been approved by the Receiver; and

(f) the services reflected in Fasken's Invoices were performed by Fasken in a prudent and economical manner, including avoiding duplication.

12. With respect to the fees and rates charged by Fasken, I confirm that:

(a) Fasken reviews its billing rates on an annual basis to ensure that its rates remain consistent with market rates charged by similar firms in the Vancouver area;

(b) the difference between the billing rates of associates and partners at Fasken, although not always significant, is in my view reasonable and consistent with the market rates; and

(c) Fasken's associates add value to our insolvency files that is proportionate to their respective billing rates by taking on tasks that are necessary to progress the file, including drafting materials, participating in strategy and planning, preparing for filings, and appearing and speaking in Court.

13. I make this affidavit for the purposes of the Receiver's application seeking approval of Fasken's fees and disbursements. Nothing in this Affidavit is intended to be a waiver of solicitor-client privilege by the Receiver.

AFFIRMED BEFORE ME at Vancouver, British Columbia, on November 5, 2026

A Commissioner for taking Affidavits for British Columbia

KIBBEN JACKSON

GLEN NESBITT
Barrister & Solicitor
Fasken Martineau DuMoulin LLP
2900 - 550 Burrard Street
Vancouver, BC V6C 0A3
604 631 4833

This is Exhibit "**A**"
Referred to in the Affidavit of
KIBBEN JACKSON
Affirmed before me this 5th day of
NOVEMBER, 2026

A Commissioner for taking Affidavits for
British Columbia

FASKEN

Fasken Martineau DuMoulin LLP
Barristers and Solicitors
Patent and Trade-mark Agents

550 Burrard Street, Suite 2900
Vancouver, British Columbia V6C 0A3
Canada

T +1 604 631 3131
+1 866 635 3131
F +1 604 631 3232

fasken.com

AlixPartners Advisory, Inc.
220 Bay Street, Suite 1300
Toronto ON M5H 1J9

Attention: Mr Noah Goldstein

October 14, 2026
Invoice #: 2336701

GST/HST#: 87937 6127
QST#: 1023151835

Matter Number: 267908.00039
Matter: Canstar Restorations LP

For Professional Services rendered through September 30, 2026 as described in the attached memorandum.

Total Fees	$ 119,956.00
Total Taxable Disbursements	120.75
Total Non Taxable Disbursements	524.57
Total Disbursements	645.32
Total Taxes	24,015.35
Total Fees, Disbursements and Taxes	144,616.67
Total Amount Owing This Bill	**CAD $ 144,616.67**

Tax Summary	
BCPST	8,405.37
HST	15,609.98
Total Taxes Included in This Bill	24,015.35

Fasken Martineau DuMoulin LLP



This account has been reviewed, verified and approved by K.M. Jackson who has authorized the signing and rendering of this account.
E. & O.E.

Your payment via EFT, Wire, Online Bank Pay or Credit Card is appreciated.
Our Banking Details are below. For credit card payments please contact your Fasken office directly.

Accounts are due when rendered.

FASKEN

Fasken Martineau DuMoulin LLP
Barristers and Solicitors
Patent and Trade-mark Agents

550 Burrard Street, Suite 2900
Vancouver, British Columbia V6C 0A3
Canada

T +1 604 631 3131
+1 866 635 3131
F +1 604 631 3232

fasken.com

AlixPartners Advisory Inc.
220 Bay Street
Suite 1300
Toronto ON M5H1J9

Attention: Bobby Kofman

November 02, 2026
Invoice #: 2346520

GST/HST#: 87937 6127
QST#: 1023151835

Matter Number: 267908.00039
Matter: Canstar Restorations LP

For Professional Services rendered through October 31, 2026 as described in the attached memorandum.

Total Fees	$ 178,411.00
Total Taxable Disbursements	4,590.23
Total Non Taxable Disbursements	411.68
Total Disbursements	5,001.91
Total Taxes	36,600.25
Total Fees, Disbursements and Taxes	220,013.16
Total Amount Owing This Bill	**CAD $ 220,013.16**

Tax Summary

BCPST	12,810.09
HST	23,790.16
Total Taxes Included in This Bill	36,600.25

Fasken Martineau DuMoulin LLP



This account has been reviewed, verified and approved by K.M. Jackson who has authorized the signing and rendering of this account.
E. & O.E.

Your payment via EFT, Wire, Online Bank Pay or Credit Card is appreciated.
Our Banking Details are below. For credit card payments please contact your Fasken office directly.

Accounts are due when rendered.