

This is the 1st Affidavit of
B. Torsky in this case and was
made on May 17, 2016

No. S-164395
Vancouver Registry

In the Supreme Court of British Columbia

Between

Royal Bank of Canada

Plaintiff

And

Norland Forest Products Ltd.
Allan Howard White

Defendants

AFFIDAVIT

I, Betty Torsky, Paralegal, of 1200 - 200 Burrard Street, in the City of
Vancouver, in the Province of British Columbia, MAKE OATH AND SAY AS FOLLOWS:

1. I am a Paralegal employed by the law firm of Border Ladner Gervais LLP,
solicitors for Royal Bank of Canada, and as such have personal knowledge of the facts
deposed to in this Affidavit except those facts which I state to be based upon information
and belief and as to such facts I believe them to be true.

2. Attached and marked as **Exhibit "A"** to this Affidavit is a true copy of a letter dated May 16, 2016 whereby KPMG Inc. consents to act as Receiver of all the current and future assets, undertakings and properties of Norland Forest Products Ltd.

SWORN BEFORE ME at the City of)
Vancouver, in the Province of)
British Columbia, this 17th day of May,)
2016.)
)
)
)



A Commissioner for taking
Affidavits for British Columbia



Betty Torsky

MARTHA A. MARTINDALE
Barrister & Solicitor
1200 Waterfront Centre, 200 Burrard Street
P.O. Box 48600, Vancouver, Canada V7X 1T2
604-640-4040

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THIS IS EXHIBIT "A" REFERRED TO IN THE AFFIDAVIT OF
BETTY TORSKY MADE BEFORE ME ON THE
17TH DAY OF MAY, 2016

A handwritten signature in black ink, consisting of a looped 'B' shape followed by a horizontal line extending to the right.

A COMMISSIONER FOR TAKING AFFIDAVITS FOR
BRITISH COLUMBIA



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Borden Ladner Gervais LLP
1200 Waterfront Centre
200 Burrard Street
Vancouver, British Columbia
V7X 1T2

May 16, 2016

Attention: Ms. Martha Martindale

**Royal Bank of Canada v. Norland Forest Products Ltd. and Allan Howard
White and in the Matter of the Receivership of Norland Forest Products Ltd.
Supreme Court of British Columbia, Vancouver Registry, Action No. TBD**

We confirm that we are prepared to act as Receiver of all the current and future assets, undertakings and properties of Norland Forest Products Ltd. in the above proceeding.

We are aware that if we are appointed, we will be acting as an Officer of the Supreme Court of British Columbia (the "Court"). We confirm that we will abide by any Order made by the Court.

Yours truly,

KPMG INC.

A handwritten signature in black ink, appearing to read 'Anthony Tillman'.

Per: Anthony Tillman

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Royal Bank of Canada

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and

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Defendants

AFFIDAVIT

BORDEN LADNER GERVAIS LLP
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Telephone: (604) 687-5744
Attention: Martha Martindale
Client No. 547761/186