



Affidavit #2 of Azadeh Kharazmi  
affirmed: July 14, 2025

No: S251915  
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

IN THE MATTER OF THE RECEIVERSHIP OF BRIERE PRODUCTION GROUP INC. AND  
BRIERE TRANSPORTATION LTD.

BETWEEN:

ROYAL BANK OF CANADA

PETITIONER

AND:

BRIERE PRODUCTION GROUP INC.  
BRIERE TRANSPORTATION LTD.  
CHRISTOPHER BRIERE

RESPONDENTS

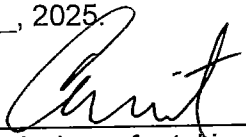
**AFFIDAVIT**

I, **Azadeh Kharazmi**, Paralegal, of 2300 – 550 Burrard Street, Vancouver, British Columbia, MAKE OATH AND SAY AS FOLLOWS:

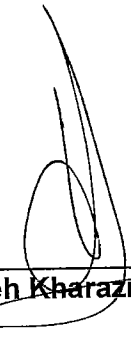
1. I am an Paralegal with the firm of Gowling WLG (Canada) LLP ("**Gowling**"), counsel for BDO Canada Limited in its capacity as court-appointed Receiver (the "**Receiver**") of Briere Production Group Inc. ("**BPG**") and Briere Transportation Ltd. ("**BT**" and together with Production, the "**Companies**"), and as such, I have personal knowledge of the facts and matters hereinafter deposed to, save and except where the same are stated to be based on information and belief and where so stated I verily believe them to be true.
2. Attached hereto and marked as Exhibit "A" to this my Affidavit is a copy of an email chain sent by counsel for the Receiver to the Service List on July 14, 2025 attaching copies of unfiled Notice of Application materials and informing the service list of the hearing of the Notice of Application being set for Monday, July 21, 2025 before Justice Masuhara.

3. Attached hereto and marked as Exhibit "B" to this my Affidavit is a copy of email correspondence between counsel for the Receiver and Supreme Court Scheduling confirming the date of hearing on July 21, 2025 at 9:15am before Justice Masuhara.

SWORN BEFORE ME at Vancouver, BC, on )  
July 14, 2025. )



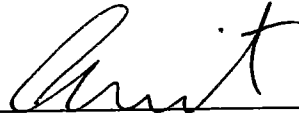
\_\_\_\_\_)  
A Commissioner for taking Affidavits within )  
British Columbia )



\_\_\_\_\_)  
**Azadeh Kharazmi**

**AMARIT BAINS**  
GOWLING WLG (CANADA) LLP  
BARRISTER & SOLICITOR  
550 BURRARD STREET - SUITE 2300  
BENTALL 5 - VANCOUVER, B.C. V6C 2B5  
TELEPHONE: (604) 443-7679

This is **Exhibit "A"** referred to in the Affidavit of Azadeh Kharazmi, sworn before me at Vancouver, British Columbia, this 14<sup>th</sup> day of July, 2025.



---

A Commissioner for taking Affidavits for BC

## Kharazmi, Azzie

---

**From:** Bains, Amarit  
**Sent:** July 14, 2025 9:25 AM  
**To:** 'cbowra@bdo.ca'; 'jordan.schultz@dentons.com'; 'catherine.ewasiuk@dentons.com'; 'chelsea.denton@dentons.com'; 'avic.arenas@dentons.com'; 'nav.sidhu@dentons.com'; 'gd@gdlaw.com'; 'John@JVGLogisticsLTD.com'; 'simon@kinotropy.com'; 'dortis@vaultcredit.ca'; 'danielle@ascentemploymentlaw.ca'; 'gailkss@hotmail.com'; 'swilliams@inland-group.com'; 'ardept@inland-group.com'; 'amber.baptiste@roberthalf.com'; 'joanna.alford@meridianonecap.ca'; 'collections@meridianonecap.ca'; 'lossrecovery@meridianonecap.ca'; 'rlaity@blg.com'; 'jreid@mltaikins.com'; 'dhyndman@kornfeldllp.com'; 'jessicat@journeycapital.ca'; 'collections@journeycapital.ca'  
**Cc:** Ross, Jonathan B; 'Bandali, Alykhan'  
**Subject:** RE: Notice of Application - Briere Production Group et al (S-251915 Vancouver Registry)

Good morning,

Further to my below email, this matter will be heard on Monday July 21 at 9:00am in in front of Justice Masuhara.

Amarit Bains  
Associate  
T +1 604 443 7679  
amarit.bains@gowlingwlg.com

My Assistant: Michèle Hay  
T +1 604 443 7628  
michele.hay@gowlingwlg.com



**From:** Bains, Amarit  
**Sent:** July 10, 2025 6:14 PM  
**To:** cbowra@bdo.ca; jordan.schultz@dentons.com; catherine.ewasiuk@dentons.com; chelsea.denton@dentons.com; avic.arenas@dentons.com; nav.sidhu@dentons.com; gd@gdlaw.com; John@JVGLogisticsLTD.com; simon@kinotropy.com; dortis@vaultcredit.ca; danielle@ascentemploymentlaw.ca; gailkss@hotmail.com; swilliams@inland-group.com; ardept@inland-group.com; amber.baptiste@roberthalf.com; joanna.alford@meridianonecap.ca; collections@meridianonecap.ca; lossrecovery@meridianonecap.ca; rlaity@blg.com; jreid@mltaikins.com; dhyndman@kornfeldllp.com; jessicat@journeycapital.ca; collections@journeycapital.ca  
**Cc:** Ross, Jonathan B <Jonathan.Ross@ca.gowlingwlg.com>; Bandali, Alykhan <abandali@bdo.ca>  
**Subject:** Notice of Application - Briere Production Group et al (S-251915 Vancouver Registry)

Attached for service are the following:

1. Notice of Application (unfiled), to be heard either Friday July 18, 2025 or Monday July 21, 2025 at 10:00 am (Pacific time);
  - a. Our office has requested to appear in front of an insolvency Judge on either July 18 or July 21 and have not heard back from court scheduling. If either of the aforementioned dates are not

available, we intend to bring a short leave application to have the enclosed notice of application heard on Friday July 18, 2025 in regular Judge's chambers.

2. Receiver's Report dated July 9, 2025; and
3. Affidavit #1 Azadeh Kharazmi, affirmed July 9, 2025;

Please advise Jonathan Ross at [jonathan.ross@gowlingwlg.com](mailto:jonathan.ross@gowlingwlg.com) and/or Amarit Bains at [amarit.bains@gowlingwlg.com](mailto:amarit.bains@gowlingwlg.com) by email, if you plan on attending the hearing.

Amarit Bains

*Associate*

T +1 604 443 7679

[amarit.bains@gowlingwlg.com](mailto:amarit.bains@gowlingwlg.com)

My Assistant: Michèle Hay

T +1 604 443 7628

[michele.hay@gowlingwlg.com](mailto:michele.hay@gowlingwlg.com)



Gowling WLG (Canada) LLP  
Suite 2300, Bentall 5  
550 Burrard Street  
Vancouver BC V6C 2B5  
Canada



[gowlingwlg.com](http://gowlingwlg.com)

Gowling WLG | 1,500+ legal professionals worldwide

This is **Exhibit "B"** referred to in the Affidavit of Azadeh Kharazmi, sworn before me at Vancouver, British Columbia, this 14<sup>th</sup> day of July, 2025.



---

A Commissioner for taking Affidavits for BC

## **Kharazmi, Azzie**

---

**From:** SC Civil-Vancouver <sc.civil\_va@BCCourts.ca>  
**Sent:** July 14, 2025 10:41 AM  
**To:** Bains, Amarit; jordan.schultz@dentons.com; gd@gdlaw.ca; SC Civil-Vancouver  
**Subject:** RE: Insolvency Assignment: VA S-251915 Royal Bank of Canada v. Briere Production Group Inc., Briere Transportation Ltd., Christopher Briere CONF#125780705

This message originated from outside of Gowling WLG. | Ce message provient de l'extérieur de Gowling WLG.

---

Good morning,

Apologies, this hearing is set 9:15am on Monday, July 21<sup>st</sup>.

Thank you,

### **Supreme Court Scheduling**

**phone:** 604.660.2853  
**email:** [sc.civil\\_va@bcccourts.ca](mailto:sc.civil_va@bcccourts.ca)  
**website:** [www.bcccourts.ca](http://www.bcccourts.ca)  
**hours:** Mon.- Fri., 8:30 am - 4:30 pm

This message and any attachments are intended solely for the individual or entity to which the message is addressed and may contain information that is privileged, confidential or exempt from disclosure. Unauthorized distribution, copying or disclosure is strictly prohibited. If you have received this message in error, please notify the sender immediately and delete the original message and any attachments from your inbox and your deleted items folder. Thank you.

**From:** SC Civil-Vancouver  
**Sent:** July 14, 2025 9:21 AM  
**To:** Bains, Amarit <Amarit.Bains@gowlingwlg.com>; jordan.schultz@dentons.com; gd@gdlaw.ca  
**Cc:** SC Civil-Vancouver <sc.civil\_va@BCCourts.ca>  
**Subject:** RE: Insolvency Assignment: VA S-251915 Royal Bank of Canada v. Briere Production Group Inc., Briere Transportation Ltd., Christopher Briere CONF#125780705

Justice Masuhara has been assigned to hear this on Monday, July 21<sup>st</sup> at 9:00am for up to 30 minutes. Please file your materials pursuant to the rules to confirm.

### **Supreme Court Scheduling**

**phone:** 604.660.2853  
**email:** [sc.civil\\_va@bcccourts.ca](mailto:sc.civil_va@bcccourts.ca)  
**website:** [www.bcccourts.ca](http://www.bcccourts.ca)  
**hours:** Mon.- Fri., 8:30 am - 4:30 pm

This message and any attachments are intended solely for the individual or entity to which the message is addressed and may contain information that is privileged, confidential or exempt from disclosure. Unauthorized distribution, copying or disclosure is strictly prohibited. If you have received this message in error, please notify the sender immediately and delete the original message and any attachments from your inbox and your deleted items folder. Thank you.

**From:** Bains, Amarit <[Amarit.Bains@gowlingwlg.com](mailto:Amarit.Bains@gowlingwlg.com)>  
**Sent:** July 8, 2025 6:14 PM  
**To:** SC Civil-Vancouver <[sc.civil\\_va@BCCourts.ca](mailto:sc.civil_va@BCCourts.ca)>

**Subject:** RE: Insolvency Assignment: VA S-251915 Royal Bank of Canada v. Briere Production Group Inc., Briere Transportation Ltd., Christopher Briere CONF#125780705

Good afternoon,

We would prefer to have this matter heard on July 18 and hold July 21 as a back update if there is no judge available on July 18. Thanks in advance, and apologies for any inconvenience.

Amarit Bains  
Associate  
T +1 604 443 7679  
[amarit.bains@gowlingwlg.com](mailto:amarit.bains@gowlingwlg.com)

My Assistant: Michèle Hay  
T +1 604 443 7628  
[michele.hay@gowlingwlg.com](mailto:michele.hay@gowlingwlg.com)



**From:** WebServices SC <[WebServices\\_SC@bccourts.ca](mailto:WebServices_SC@bccourts.ca)>  
**Sent:** July 8, 2025 11:28 AM  
**To:** Bains, Amarit <[Amarit.Bains@ca.gowlingwlg.com](mailto:Amarit.Bains@ca.gowlingwlg.com)>; [jordan.schultz@dentons.com](mailto:jordan.schultz@dentons.com); [gd@gdlaw.ca](mailto:gd@gdlaw.ca)  
**Cc:** SC Civil-Vancouver <[sc.civil\\_va@BCCourts.ca](mailto:sc.civil_va@BCCourts.ca)>  
**Subject:** Insolvency Assignment: VA S-251915 Royal Bank of Canada v. Briere Production Group Inc., Briere Transportation Ltd., Christopher Briere CONF#125780705

This message originated from outside of Gowling WLG. | Ce message provient de l'extérieur de Gowling WLG.

---

**Please note: if your request is urgent (needs to be dealt with within 5 business days), please inform Scheduling after submitting your request by calling 604-660-2853**

**Jurisdiction:** Judge

**Action Number (if known):** S-251915

**Anticipated style of proceeding:** Royal Bank of Canada v. Briere Production Group Inc., Briere Transportation Ltd., Christopher Briere

**Registry location:** Vancouver

**Hearing location:** Vancouver

**Hearing dates and time estimates**

**Anticipated hearing date(s):** July 21, 2025

**Time estimate of first hearing:** 30 mins

**Aware of or anticipate contested hearing? Comments?** Uncontested.

**Type of proceeding:** BIA, Receivership, Other - Approval of Sale

**Nature of application:** Application brought by receiver, BDO Canada Ltd. to obtain an order: -approving the sale of the defendant's assets; -assign defendants into bankruptcy; -production of the defendant's records; and -approving the actions of the Receiver.

**Type of company/individual involved:** Privately held company

**Amount of debt involved:** Approximately \$1.5 million

**Does the proceeding involve cross border filings (including potential filings):** No

**Degree of complexity (1-5):** 2

**Applicant Information**

**Counsel name:** Amarit P. Bains

**Email address:** [amarit.bains@gowlingwlg.com](mailto:amarit.bains@gowlingwlg.com)

**Phone number:** 604-443-7679

**Opposing counsel(s)/Litigant(s):**

**Name:** Jordan Schultz/Catherine Ewasiuk

**Email address:** [jordan.schultz@dentons.com](mailto:jordan.schultz@dentons.com)

**Phone number:** 604-691-6452

**Name:** Geoffrey Dabbs

**Email address:** [gd@gdlaw.ca](mailto:gd@gdlaw.ca)

**Phone number:** 604-642-0117

The information in this email is intended only for the named recipient and may be privileged or confidential. If you are not the intended recipient please notify us immediately and do not copy, distribute or take action based on this email. If this email is marked 'personal' Gowling WLG is not liable in any way for its content. E-mails are susceptible to alteration. Gowling WLG shall not be liable for the message if altered, changed or falsified.

Gowling WLG (Canada) LLP is a member of Gowling WLG, an international law firm which consists of independent and autonomous entities providing services around the world. Our structure is explained in more detail at [//www.gowlingwlg.com/legal](http://www.gowlingwlg.com/legal).

References to 'Gowling WLG' mean one or more members of Gowling WLG International Limited and/or any of their affiliated businesses as the context requires. Gowling WLG (Canada) LLP has offices in Montréal, Ottawa, Toronto, Hamilton, Waterloo Region, Calgary and Vancouver.