



Affidavit #1 of Michèle Hay
sworn: July 29, 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

PLAINTIFF

AND:

BRIERE PRODUCTION GROUP INC.
BRIERE TRANSPORTATION LTD.
CHRISTOPHER BRIERE

DEFENDANTS

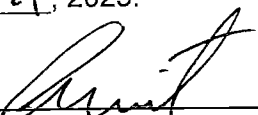
AFFIDAVIT

I, **MICHÈLE HAY**, Legal Assistant, of 2300 – 550 Burrard Street, Vancouver, British Columbia, MAKE OATH AND SAY AS FOLLOWS:

1. I am a Legal Assistant 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 an email from me to counsel for the defendants enclosing a letter dated July 25, 2025.

SWORN BEFORE ME at Vancouver, BC, on)
July 29, 2025.)


_____)
A Commissioner for taking Affidavits within)
British Columbia)


_____)
MICHELE HAY)

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

Hay, Michèle

From: Hay, Michèle
Sent: July 25, 2025 9:16 AM
To: 'Geoffrey Dabbs'
Cc: Bains, Amarit
Subject: RBC v. Briere Production Group Inc. (Receivership of Briere Production Group Inc. et al); SCBC No. S251915
Attachments: Letter to G. Dabbs July 25, 2025(69591532.1).pdf

Please see attached our letter to you dated July 25, 2025.

Thank you

Michèle Hay
Legal Administrative Assistant
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Vancouver BC V6C 2B5
Canada



gowlingwlg.com

Gowling WLG | 1,500+ legal professionals worldwide

This is Exhibit "A" referred to in the
affidavit of MICHELE HAY
sworn before me at Vancouver
this 29 day of JULY, 2025
[Signature]
A Commissioner for taking Affidavits
within British Columbia

July 25, 2025

Amarit Bains
Associate
Direct +1 604 443-7679
amarit.bains@ca.gowlingwlg.com
File no. G10054154

BY EMAIL: gd@gdlaw.ca

Gehlen Dabbs Cash LLP
1201 – 1030 West Georgia Street
Vancouver, BC V6E 2Y3

Attention: Geoffrey H. Dabbs

Dear Mesdames/Sirs:

Re: Production Request - Royal Bank of Canada v. Briere Production Group Inc. et al, Vancouver Registry No. S-S-S251915 (the "Action")

As you are aware we are legal counsel for BDO Canada Limited (the "**Receiver**") in the above noted Action and we write in respect to our letter dated June 5, 2025 and your email dated July 21, 2025 in which you advise that you will review the issue of the production order (the "**Production Order**") with your client.

Briere Transportation Ltd., Briere Production Group Inc. and Christopher Briere (collectively your "**Client**") has failed to rectify the Breaches as defined in the June 5, 2025 letter and the Receiver's requests remain outstanding. Due to the outstanding requests and your Client's failure to cooperate with the Receiver, our office has reset the portion of the notice of application filed July 14, 2025 dealing with the Production Order and Distribution/Amendment Order to be heard on August 1, 2025.

In the interim and for the sake of specificity the Receiver writes to demand the location and to receive delivery of your Client's missing assets, including but not limited to:

- 1) Allen & Heath S7000;
- 2) Digico SD12 console;
- 3) Control rack;
- 4) INFiLED LED panels;
- 5) IEM's and wireless mics;
- 6) Blackline;
- 7) Administrative website access;
- 8) Access to social media;
- 9) Access to email accounts;
- 10) A full list of vehicles owned by your Client as at May 1, 2025; and
- 11) Full access to your Client's servers including access to digital accounting records,

(the "**Specified Requests**").

Please provide the Specified Requests no later than 4:00pm on July 31, 2025 so that the Receiver can consider if proceeding with the Production Order is still required, failing which the Receiver intends to proceed with seeking a Production Order as aforementioned. Despite the Receiver not yet having obtained the Production Order, your Client continues to be responsible for providing access and cooperating with the Receiver pursuant to the Receivership Order. The Receiver reserve the right to exercise any and all remedies



available to it under the Receivership Order, or at law or otherwise, including seeking an order that your Client is in contempt of court.

We trust the above to be in order, please govern yourself accordingly.

Yours truly,

GOWLING WLG (CANADA) LLP

A handwritten signature in cursive script, appearing to read "Amarit".

Amarit Bains

No. S-251915
Vancouver Registry

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CHRISTOPHER BRIERE

DEFENDANTS

AFFIDAVIT

GOWLING WLG (CANADA) LLP

Barristers & Solicitors
Bentall 5, Suite 2300,
550 Burrard Street
Vancouver, BC V6C 2B5

Attention: Amarit Bains

Tel: 604.683.6498

Fax: 604.683.3558

File No. G10054154

AB/msh