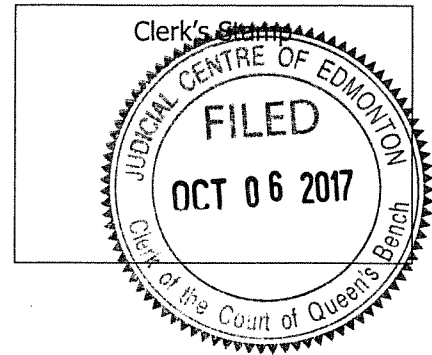


COURT FILE NO. 1103 14112 and 1403 04885  
COURT COURT OF QUEEN'S BENCH OF ALBERTA  
JUDICIAL CENTRE EDMONTON



IN THE MATTER OF THE TRUSTEE ACT, R.S.A.  
2000, c. T-8, AS AMENDED, and

IN THE MATTER OF THE SAWRIDGE BAND INTER  
VIVOS SETTLEMENT CREATED BY CHIEF WALTER  
PATRICK TWINN, OF THE SAWRIDGE INDIAN  
BAND, NO. 19, now known as SAWRIDGE FIRST  
NATION, ON APRIL 15, 1985 (the "1985 Trust"),

AND

IN THE MATTER OF THE SAWRIDGE TRUST  
CREATED BY CHIEF WALTER PATRICK TWINN,  
OF THE SAWRIDGE INDIAN BAND NO. 19,  
AUGUST 15, 1986 (the "1986 Trust")

APPLICANT CATHERINE TWINN, as Trustee for the 1985 Trust and the 1986 Trust  
RESPONDENTS ROLAND TWINN, BERTHA L'HIRONDELLE, EVERETT JUSTIN TWIN AND MARGARET  
WARD, as Trustees for the 1985 Trust and the 1986 Trust

DOCUMENT **AFFIDAVIT OF CATHERINE TWINN**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	McLENNAN ROSS LLP #600 West Chambers 12220 Stony Plain Road Edmonton, AB T5N 3Y4	Lawyer: Crista Osualdini Telephone: (780) 482-9200 Fax: (780) 482-9100 Email: cosualdini@mross.com File No.: 144194
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**AFFIDAVIT OF CATHERINE TWINN**

**SWORN ON THE 6<sup>th</sup> DAY OF OCTOBER, 2017**

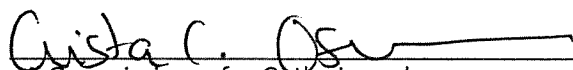
I, Catherine Twinn, of the Sawridge Indian Reserve 150 G and the City of Edmonton, in the Province of Alberta, SWEAR AND SAY THAT:

1. I am a trustee of the Sawridge Band Inter Vivos Settlement, April 15, 1985 (the "1985 Trust") and the Sawridge Trust, August 15, 1986 (the "1986 Trust") (collectively referred to as the

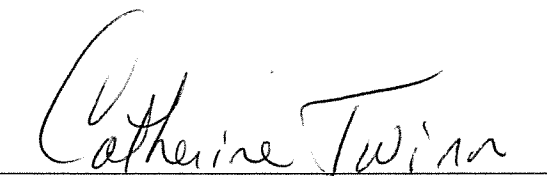
"Trusts"), and, as such, have a personal knowledge of the matters hereinafter deposed to, save where stated to be based upon information and belief.

2. I have reviewed the Affidavit of Paul Bujold filed August 30, 2017 (the "August 2017 Affidavit") and wish to respond to certain evidence provided by Mr. Bujold and advise the Court that I generally dispute his information contained in the August 2017 Affidavit.
3. Mr. Bujold states at paragraph 10 of his Affidavit that he refutes my evidence that the Trusts have spent more than \$4 million dollars on the 1103 and 1403 actions. Those terms are defined in Mr. Bujold's affidavit.
4. Following the filing of the August 2017 Affidavit, Mr. Bujold circulated meeting materials to the trustees of the Trusts in relation to the September 2017 trustee meeting. In these materials a chart was included that set out the total legal expenses paid by the Trusts in relation to the 1103 and 1403 actions. These expenses amounted to over \$4.2 million dollars and do not include my claimed expenses or all of the Office of the Public Trustee's expenses. Attached as **Exhibit "A"** to my Affidavit is a copy of the expense chart.
5. Attached as a separate document to Mr. Bujold's report was a chart that set out the accumulated fees of those parties who had claimed reimbursement and had not yet received same. These fees primarily are my own and the Office of the Public Trustee's. Attached as **Exhibit "B"** to my Affidavit is a copy of the unpaid expenses chart.
6. I swear this as evidence for the Court and for no improper purpose.

**SWORN BEFORE ME** at the  
City of Edmonton,  
in the Province of Alberta  
the 6<sup>th</sup> day of October, 2017

  
A Commissioner for Oaths in and  
for the Province of Alberta

**Crista C. Osualdini**  
Barrister & Solicitor

  
CATHERINE TWINN

Year	Amount	Legal Actions
<b>2010 Total Legal</b>	220,069.53	Trust Setup by Trustees, Identification of Beneficiaries by Trustees
<b>2011 Total Legal</b>	403,297.37	Taxation by Trustees, Passing of Accounts by Trustees, 1103 Action by Trustees
<b>2012 Total Legal</b>	362,442.82	1103 Action by Trustees, Appeal by Trustees, Passing of Accounts by Trustees
<b>2013 Total Legal</b>	182,436.40	1103 Action by Trustees, Appeal by Trustees, Passing of Accounts by Trustees
<b>2014 Total Legal</b>	387,692.92	1103 Action by Trustees, Transfer of Assets 1 by Trustees, Transfer of Assets 2 by Trustees, 1403 Action by Catherine Twinn
<b>2015 Total Legal</b>	658,589.01	1103 Action by Trustees, 1403 Action by Catherine Twinn, 1503 Action by Catherine Twinn, Code of Conduct 1 by Trustees,
<b>2016 Total Legal</b>	1,093,572.20	1103 Action by Trustees, 1403 Action by Catherine Twin, 1503 Action by Catherine Twinn, Code of Conduct 1 by Trustees, Settlement Costs Code of Conduct by Catherine Twinn, Appeal by Catherine Twinn and OPGT, Application for Stay by OPGT, Costs Application by Catherine Twinn, Appeal by Maurice Stoney
<b>2017 Legal To Date (Aug 2017)</b>	914,341.29	1103 Action by Trustees, 1403 Action by Catherine Twinn, 1503 Action by Catherine Twinn, Code of Conduct 2 by Trustees, Settlement Costs Code of Conduct by Catherine Twinn, Costs Application by Catherine Twinn, Appeals by Maurice Stoney, Pricilla Kennedy, Patrick Twinn et al
<b>TOTAL</b>	<b>4,222,441.54</b>	

This is Exhibit " A " referred to in the  
Affidavit of

Catherine Twinn

Sworn before me this 6 day  
of October 2017

Crista C. Os  
A Commissioner for Oaths  
in and for the Province of Alberta

**Crista C. Osualdini**  
Barrister & Solicitor

Firm	Amount	Actions
2014 Legal Outstanding	87,334.61	Catherine Twinn
2015 Legal Outstanding	330,949.28	Catherine Twinn, Hutchison Law
2016 Legal Outstanding	956,955.73	Catherine Twinn, Hutchison Law
2017 Legal Outstanding	623,309.50	Catherine Twinn, Hutchison Law, Trustees Code of Conduct
<b>Total Outstanding (Aug)</b>	<b>1,998,549.12</b>	
Unknown Amounts		Patrick Twinn et al, Maurice Stoney et al, Priscilla Kennedy

This is Exhibit " B " referred to in the  
Affidavit of

Catherine Twinn

Sworn before me this 6 day  
of October 2017

Crista C. Os

A Commissioner for Oaths  
in and for the Province of Alberta

**Crista C. Osualdini**  
Barrister & Solicitor