

Form 49  
Alberta Rules of Court  
Rule 13.19

Clerk's stamp:



COURT FILE NUMBER 1403 04885 and 1103 14112

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

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 THE SAWRIDGE  
TRUST ("Sawridge Trusts")

AND

IN THE MATTER OF THE SAWRIDGE BAND INTER  
VIVOS SETTLEMENT 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 1986 Trust ("Four  
Sawridge Trustees")

DOCUMENT AFFIDAVIT OF ANNAR HIRANI

ADDRESS FOR SERVICE AND  
CONTACT INFORMATION OF  
PARTY FILING THIS DOCUMENT BRYAN & COMPANY LLP  
2600 Manulife Place  
10180 - 101 Street  
Edmonton, AB T5J 3Y2

LAWYER IN CHARGE: NANCY E. CUMMING, Q.C.  
Phone: 780.423.5730  
File No. 29793-1/NEC

**AFFIDAVIT OF AFFIDAVIT OF ANNAR HIRANI**

Sworn on the 21<sup>st</sup> day of SEPTEMBER, 2017

1. I, ANNAR HIRANI, of the City of Edmonton, in the Province of Alberta MAKE OATH AND SAY THAT:
2. I am a legal assistant at the law firm of Bryan & Company LLP, solicitors for Four Sawridge Trustees, and as such I have personal knowledge of the matters hereinafter deposed to, except where stated to be based upon information and belief, and where so stated, I verily believe the same to be true.
3. I am advised by Nancy E. Cumming and do verily believe that a letter enclosing Consent Confidentiality Orders for review was sent to Crista Osualdini of McLennan Ross on March 30, 2017.
4. Attached hereto and marked as Exhibit "A" to this my affidavit is a true copy of the letter to Crista Osualdini of McLennan Ross LLP from Nancy E. Cumming of Bryan & Company LLP dated March 30, 2017 addressing the issues of confidentiality.
5. An email dated March 30, 2017 enclosing for review a form of Consent Confidentiality Order with respect to the 1103 14112 Action ("1103 Action") and a form of Consent Confidentiality Order with respect to the 1403 04885 Acton ("1403 Action") is attached hereto and marked as Exhibit "B" to this my affidavit.
6. I am advised by Nancy E. Cumming and do verily believe that she did not receive a response to the letter or the email sent to McLennan Ross LLP.
7. Attached hereto and marked as Exhibit "C" to this my Affidavit is an email dated August 29, 2017 which also references an email sent August 28, 2017 concerning the matter of the Consent Confidentiality Orders for each of the 1103 Action and the 1403 Action. No response has been received to these emails in terms of McLennan Ross LLP's position on the Consent Confidentiality Orders.
8. I am advised by Nancy E. Cumming that she again requested a response on the Confidentiality Orders when Catherine Twinn released confidential information in her answers to undertakings. Attached hereto and marked as Exhibit "D" is a copy of the email making that request dated September 14, 2017.

9. I am advised by Nancy E. Cumming that she has received no response to her request dated September 14, 2017 in respect of the Confidentiality Orders.

SWORN OR AFFIRMED BY THE DEPONENT BEFORE A COMMISSIONER FOR OATHS AT EDMONTON ALBERTA ON SEPTEMBER 21, 2017.

Annar Hirani  
ANNAR HIRANI

Leanne Mackenzie  
Commissioner for Oaths in and for the  
Province of Alberta  
LEANNE C. MACKENZIE  
A Commissioner for Oaths  
in and for Alberta  
My Commission Expires Apr 3, 2019  
Appointment Expiry Date

OUR FILE: 29793-1/NEC  
YOUR FILE: 281946  
DIRECT: 780-420-4733  
EMAIL: necumming@bryanco.com



March 30, 2017

McLennan Ross LLP  
600 West Chambers  
12220 Stony Plain Road  
Edmonton, AB T5N 3Y4

VIA EMAIL

Attention: Crista C. Osualdini

Dear Madam:

Re: Roland Twinn, Walter Felix Twin, Bertha L'Hirondelle, and Clara Midbo, Everett Justin Twin, as Trustees for the Sawridge Trusts v. Catherine Twinn

I have enclosed Mr. Bujold's Answers to Undertakings and Answers to Written Interrogatories. The documents will be provided shortly.

We also need to come to an agreement with respect to confidentiality. A number of the documents are confidential and should not form part of any document filed with the Law Courts. As a result, I would propose that we agree to a Confidentiality Order. I will provide you with a draft.

Yours truly,

BRYAN & COMPANY LLP

Per:

*[Signature]*  
for: NANCY E. CUMMING, Q.C.  
(Signed in the absence of the writer to avoid delay)

NEC/jn  
Enclosures

cc: Dentons LLP  
Attention: Doris C.E. Bonora,

cc: Paul Bujold

This is Exhibit - A - referred to in the  
Affidavit of  
Annar Hirani  
Sworn before me this 21<sup>st</sup> day  
of SEPTEMBER AD., 20 17  
*[Signature]*  
Notary Public, A Commissioner for Oaths  
in and for the Province of Alberta

LEANNE C. MACKENZIE  
A Commissioner for Oaths  
in and for Alberta  
My Commission Expires Apr. 3, 20 19

**From:** Nancy Cumming [<mailto:necumming@bryanco.com>]  
**Sent:** 30-Mar-17 1:45 PM  
**To:** [cosualdini@mross.com](mailto:cosualdini@mross.com)  
**Cc:** Paul Bujold; Bonora, Doris  
**Subject:** Roland Twinn et al as Trustees for the Sawridge Trusts v. Catherine Twinn

I have attached draft Confidentiality Orders. Please advise of your position.

Yours truly

**Nancy E. Cumming, Q.C.**  
Partner

<image001.jpg>

EMAIL [necumming@bryanco.com](mailto:necumming@bryanco.com)

<image003.jpg> Bryan & Company LLP  
2600 Manulife Place 10180 101 Street Edmonton Alberta T5J 3Y2  
Direct 780-420-4733 | Toll free 1 800 357 9265 | Fax 780 428 6324  
Web [www.bryanco.com](http://www.bryanco.com)

Information contained in this communication may be confidential and is intended only for the use of the individual named above subject to solicitor client privilege. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. If you have received this email in error please notify the sender. Bryan & Company LLP and Bryan & Company Calgary LLP are separate partnerships cooperating in providing legal services to the clients of each under the name "Bryan & Company"

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This is Exhibit "B" referred to in the  
Affidavit of  
ANNA HIRANI  
Sworn before me this 21<sup>st</sup> day  
of SEPTEMBER A.D. 20 17  
Leanne Mackenzie  
A Notary Public, A Commissioner for Oaths  
in and for the Province of Alberta

**LEANNE C. MACKENZIE**  
A Commissioner for Oaths  
in and for Alberta  
My Commission Expires Apr. 3, 20 19

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

Clerk's Stamp

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

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 PN APRIL 15,  
1985 (the "1985 Sawridge Trust")

APPLICANTS ROLAND TWINN, CATHERINE TWINN,  
EVERETT JUSTIN TWIN, BERTHA  
L'HIRONDELLE, and MARGARET WARD, as  
Trustees for the 1985 Sawridge Trust (the  
"Trustees")

DOCUMENT CONSENT CONFIDENTIALITY ORDER

PARTY FILING THIS DOCUMENT ROLAND TWINN, BERTHA L'HIRONDELLE, EVERETT JUSTIN  
TWIN, and MARGARET WARD as Trustees for the 1985 Trust and  
the 1986 Trust

ADDRESS FOR SERVICE OF LAWYER OF RECORD BRYAN & COMPANY LLP  
2600 Manulife Place  
10180 - 101 Street  
Edmonton, AB T5J 3Y2

LAWYER IN CHARGE Nancy E. Cumming, Q.C.  
Phone: 780.423.5730  
File No.: 29793-1/NEC

DATE ON WHICH ORDER WAS PRONOUNCED:

NAME OF JUSTICE WHO MADE THIS ORDER:

UPON THE APPLICATION of ROLAND TWINN, BERTHA L'HIRONDELLE, EVERETT JUSTIN  
TWIN, and MARGARET WARD as Trustees for the 1985 Trust and the 1986 Trust; AND UPON  
IT APPEARING THAT the parties ROLAND TWINN, BERTHA L'HIRONDELLE, EVERETT  
JUSTIN TWIN, and MARGARET WARD as Trustees for the 1985 Trust and the 1986 Trust and

CATHERINE TWINN, as Trustee for the 1985 Trust and 1986 Trust, have consented to this Order by the signatures of their counsel on page 5 of the counterpart pages hereof;

IT IS HEREBY ORDERED THAT:

1. Information contained in any record or thing produced or otherwise created by any party during and for the purposes of the within action, including, but not limited to, documentary production, electronic record production, transcripts, exhibits, answers to undertakings, affidavits, responses to Notices to Admit and experts' reports, together with the documents themselves (collectively, "Information"), except published Information and any non-published Information which is publicly available, may be subject to this Order.
2. "Confidential Information" shall mean any document or any type or classification of information which is designated as "confidential" by any party pursuant to Paragraph 8.
3. Any records produced or otherwise disclosed in the action which have been identified by any party as "Confidential Information" in its List of Documents and any Supplemental List of Documents shall be subject to this Order. However, records produced or otherwise disclosed in this action which may subsequently be identified by any party as "Confidential Information" are also subject to this Order.
4. Only the following persons shall be entitled to receive Confidential Information:
  - (a) Counsel of record and their employees;
  - (b) The parties to the action;
  - (c) Experts, consultants and agents retained by counsel or by a party to assist in the preparation for trial of this action who must be advised by counsel of record that they are bound by the terms of this Order and who in writing acknowledge they have been so advised and agree to abide by this Order prior to receiving or being shown Confidential Information;
  - (d) The direct staff of the foregoing persons, who are advised by the Signatories that they are bound by the terms of this Agreement and who in writing adopt this Agreement prior to receiving or being shown Confidential Information; and

- (e) The Court dealing with this action.
5. A party tendering Confidential Information to the Court must advise the Court of the terms of this Order and request the Court to receive the Confidential Information in accordance with the terms of this Order.
  6. No person receiving Confidential Information shall disseminate, disclose (except to those persons set out in Paragraph 4 of this Order) or otherwise use any such Confidential Information, except for the purposes of the trial preparation and for use at trial in this action and shall not be used by such persons, directly or indirectly, for any commercial or business purpose or for any other action or proceeding.
  7. Confidential Information shall be designated and marked "SAWRIDGE TRUSTS CONFIDENTIAL INFORMATION RE: 1103 14112 and 1403 04885" by the party asserting confidentiality. If it is not practical to mark the legend (such as on an electronically stored document), then the asserting party shall take all reasonable steps to notify the other parties that such document is subject to this Order.
  8. If any party disagrees with the confidential designation, it may advise the party asserting confidentiality, in writing, that it rejects the confidential designation as to any specified items of information so designated. To the extent that a party rejects the confidential designation, the specific item(s) of information will not be deemed Confidential Information, subject to this Confidentiality Order unless the party asserting confidentiality obtains an Order requiring that such information be treated as Confidential Information within 30 days of receipt of a notice of rejection to the confidential designation. Until an Order of this Court is issued, pertaining to the confidentiality, any confidential designated information shall be treated as Confidential Information subject to the provisions of this Order.
  9. In the case of Questioning or Questioning on Undertakings (written or oral), counsel for any party may, at the commencement of such examination, temporarily designate the entire such Questioning as Confidential Information, provided, however, that where an initial designation has been made, such counsel shall, within 30 days after the Questioning transcript or other record containing the answers becomes available to the parties, deliver to counsel for the other parties a written statement listing those portions of the transcript or other record (including any exhibits thereto or answers to



undertakings) which counsel is designating as Confidential Information, thereby rescinding the "confidential" designation of all remaining pages of the transcript or other record. In the event such notice is not received within the 30 day period, no portion of the transcript or other record shall thereafter be protected under this Order unless and until the other parties, or their respective counsel, provide express written notice of the same.

10. If any documents, transcripts of evidence, briefs, or other documents containing material subject to this Order are to be filed with the Court, they shall be filed in a sealed envelope with "CONFIDENTIAL" written on the outside and referring to this Order. The parties reserve the right to request that the Court take additional appropriate action to preserve the confidentiality of any such material that is offered, as evidenced during the trial of this action
11. This Order shall apply during, and to all aspects of, the pretrial process. During the trial of this action, each request for the maintenance of the confidentiality of any information sought to be introduced into evidence, to the extent not therefore determined under the procedures described in Paragraphs 8 or 9, will be determined by the Court.
12. Upon final determination of this action, each party shall, upon the request by any party who has asserted confidentiality, assemble and return all Confidential Information and all copies of Confidential Information. To this end, each party must provide to the party who has asserted confidentiality an account of the numbers of copies made of any Confidential Information and a list of the recipients of any Confidential Information.
13. Nothing in this Order will prejudice any party from seeking amendments hereto, broadening or restricting the rights of access to and use of Confidential Information, or making other modifications, provided, however, nothing in this Order shall affect the scope of the implied undertaking of each party not to use documents and information obtained in this litigation from any other party for purposes other than the conduct of this litigation;
14. Inadvertent production by any party of a document containing information protected by an applicable legal privilege and/or, confidential information, trade secrets, or proprietary information shall not constitute a waiver of privilege or confidentiality. Any such

document and any copies made of it shall be returned to the producing party immediately upon its request.

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Justice of the Court of Queen's Bench of  
Alberta

CONSENTED to this \_\_\_\_ day of  
March, 2017

CONSENTED to this \_\_\_\_ day of March,  
2017

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Nancy E. Cumming, Q.C.  
Counsel for ROLAND TWINN, BERTHA  
L'HIRONDELLE, EVERETT JUSTIN  
TWIN, and MARGARET WARD as  
Trustees for the 1985 Trust and the 1986  
Trust

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Crista C. Osualdini  
Counsel for CATHERINE TWINN, as Trustee  
for the 1985 Trust and 1986 Trust

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

Clerk's Stamp

IN THE MATTER OF THE SAWRIDGE BAND  
INTER VIVOS SETTLEMENT, APRIL 15, 1985  
(the "1985 Trust") and THE SAWRIDGE  
TRUST, AUGUST 15, 1986 (the "1986 Trust")

APPLICANT CATHERINE TWINN, as Trustee for the 1985  
Trust and 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 **CONSENT CONFIDENTIALITY ORDER**

PARTY FILING THIS DOCUMENT ROLAND TWINN, BERTHA L'HIRONDELLE, EVERETT JUSTIN  
TWIN, and MARGARET WARD as Trustees for the 1985 Trust and  
the 1986 Trust

ADDRESS FOR SERVICE OF LAWYER  
OF RECORD BRYAN & COMPANY LLP  
2600 Manulife Place  
10180 - 101 Street  
Edmonton, AB T5J 3Y2

LAWYER IN CHARGE Nancy E. Cumming, Q.C.  
Phone: 780.423.5730  
File No.: 29793-1/NEC

**DATE ON WHICH ORDER WAS PRONOUNCED:**

**NAME OF JUSTICE WHO MADE THIS ORDER:**

UPON THE APPLICATION of ROLAND TWINN, BERTHA L'HIRONDELLE, EVERETT JUSTIN  
TWIN, and MARGARET WARD as Trustees for the 1985 Trust and the 1986 Trust; AND UPON  
IT APPEARING THAT the parties ROLAND TWINN, BERTHA L'HIRONDELLE, EVERETT  
JUSTIN TWIN, and MARGARET WARD as Trustees for the 1985 Trust and the 1986 Trust and  
CATHERINE TWINN, as Trustee for the 1985 Trust and 1986 Trust, have consented to this  
Order by the signatures of their counsel on page 5 of the counterpart pages hereof;

**IT IS HEREBY ORDERED THAT:**

1. Information contained in any record or thing produced or otherwise created by any party during and for the purposes of the within action, including, but not limited to, documentary production, electronic record production, transcripts, exhibits, answers to undertakings, affidavits, responses to Notices to Admit and experts' reports, together with the documents themselves (collectively, "Information"), except published Information and any non-published Information which is publicly available, may be subject to this Order.
2. "Confidential Information" shall mean any document or any type or classification of information which is designated as "confidential" by any party pursuant to Paragraph 8.
3. Any records produced or otherwise disclosed in the action which have been identified by any party as "Confidential Information" in its List of Documents and any Supplemental List of Documents shall be subject to this Order. However, records produced or otherwise disclosed in this action which may subsequently be identified by any party as "Confidential Information" are also subject to this Order.
4. Only the following persons shall be entitled to receive Confidential Information:
  - (a) Counsel of record and their employees;
  - (b) The parties to the action;
  - (c) Experts, consultants and agents retained by counsel or by a party to assist in the preparation for trial of this action who must be advised by counsel of record that they are bound by the terms of this Order and who in writing acknowledge they have been so advised and agree to abide by this Order prior to receiving or being shown Confidential Information;
  - (d) The direct staff of the foregoing persons, who are advised by the Signatories that they are bound by the terms of this Agreement and who in writing adopt this Agreement prior to receiving or being shown Confidential Information; and
  - (e) The Court dealing with this action.

5. A party tendering Confidential Information to the Court must advise the Court of the terms of this Order and request the Court to receive the Confidential Information in accordance with the terms of this Order.
6. No person receiving Confidential Information shall disseminate, disclose (except to those persons set out in Paragraph 4 of this Order) or otherwise use any such Confidential Information, except for the purposes of the trial preparation and for use at trial in this action and shall not be used by such persons, directly or indirectly, for any commercial or business purpose or for any other action or proceeding.
7. Confidential Information shall be designated and marked "SAWRIDGE TRUSTS CONFIDENTIAL INFORMATION RE: 1103 14112 and 1403 04885" by the party asserting confidentiality. If it is not practical to mark the legend (such as on an electronically stored document), then the asserting party shall take all reasonable steps to notify the other parties that such document is subject to this Order.
8. If any party disagrees with the confidential designation, it may advise the party asserting confidentiality, in writing, that it rejects the confidential designation as to any specified items of information so designated. To the extent that a party rejects the confidential designation, the specific item(s) of information will not be deemed Confidential Information, subject to this Confidentiality Order unless the party asserting confidentiality obtains an Order requiring that such information be treated as Confidential Information within 30 days of receipt of a notice of rejection to the confidential designation. Until an Order of this Court is issued, pertaining to the confidentiality, any confidential designated information shall be treated as Confidential Information subject to the provisions of this Order.
9. In the case of Questioning or Questioning on Undertakings (written or oral), counsel for any party may, at the commencement of such examination, temporarily designate the entire such Questioning as Confidential Information, provided, however, that where an initial designation has been made, such counsel shall, within 30 days after the Questioning transcript or other record containing the answers becomes available to the parties, deliver to counsel for the other parties a written statement listing those portions of the transcript or other record (including any exhibits thereto or answers to undertakings) which counsel is designating as Confidential Information, thereby

rescinding the "confidential" designation of all remaining pages of the transcript or other record. In the event such notice is not received within the 30 day period, no portion of the transcript or other record shall thereafter be protected under this Order unless and until the other parties, or their respective counsel, provide express written notice of the same.

10. If any documents, transcripts of evidence, briefs, or other documents containing material subject to this Order are to be filed with the Court, they shall be filed in a sealed envelope with "CONFIDENTIAL" written on the outside and referring to this Order. The parties reserve the right to request that the Court take additional appropriate action to preserve the confidentiality of any such material that is offered, as evidenced during the trial of this action
11. This Order shall apply during, and to all aspects of, the pretrial process. During the trial of this action, each request for the maintenance of the confidentiality of any information sought to be introduced into evidence, to the extent not therefore determined under the procedures described in Paragraphs 8 or 9, will be determined by the Court.
12. Upon final determination of this action, each party shall, upon the request by any party who has asserted confidentiality, assemble and return all Confidential Information and all copies of Confidential Information. To this end, each party must provide to the party who has asserted confidentiality an account of the numbers of copies made of any Confidential Information and a list of the recipients of any Confidential Information.
13. Nothing in this Order will prejudice any party from seeking amendments hereto, broadening or restricting the rights of access to and use of Confidential Information, or making other modifications, provided, however, nothing in this Order shall affect the scope of the implied undertaking of each party not to use documents and information obtained in this litigation from any other party for purposes other than the conduct of this litigation;
14. Inadvertent production by any party of a document containing information protected by an applicable legal privilege and/or, confidential information, trade secrets, or proprietary information shall not constitute a waiver of privilege or confidentiality. Any such document and any copies made of it shall be returned to the producing party immediately upon its request.

---

Justice of the Court of Queen's Bench of  
Alberta

CONSENTED to this \_\_\_\_ day of  
March, 2017

CONSENTED to this \_\_\_\_ day of March,  
2017

---

Nancy E. Cumming, Q.C.  
Counsel for ROLAND TWINN, BERTHA  
L'HIRONDELLE, EVERETT JUSTIN  
TWIN, and MARGARET WARD as  
Trustees for the 1985 Trust and the 1986  
Trust

---

Crista C. Osualdini  
Counsel for CATHERINE TWINN, as Trustee  
for the 1985 Trust and 1986 Trust

From: Bonora, Doris [mailto:doris.bonora@dentons.com]

Sent: Tuesday, August 29, 2017 7:32 AM

To: Crista Osualdini <cosualdini@mross.com>; Karen Platten <kplatten@mross.com>

Cc: 'Paul@sawridgetrusts.ca' <Paul@sawridgetrusts.ca>; Brian Heidecker <brian@sawridgetrusts.ca>; Nancy Cumming <necumming@brvanco.com>

Subject: sawridge and Catherine Twin costs application

Crista and Karen

Nancy is having some trouble with her internet. She sent an email yesterday about the confidentiality order. Here is the letter and the orders that she sent to you in March, 2017 to which no response was given as far as I can find. This is an issue that must be addressed given the amount of privileged material that Catherine has released in her affidavits and undertakings.

Doris



Doris C.E. Bonora  
Partner

D +1 780 423 7188  
doris.bonora@dentons.com  
Bio | Website

Dentons Canada LLP  
2900 Manulife Place, 10180 - 101 Street Edmonton, AB T5J 3V5 Canada

大成 Salans FMC SNR Denton McKenna Long

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. This email may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete this email from your systems. To update your commercial electronic message preferences email [dentonsinsightsca@dentons.com](mailto:dentonsinsightsca@dentons.com) or visit our website. Please see dentons.com for Legal Notices.

This is Exhibit "C" referred to in the  
Affidavit of  
ANNAR HIRANI  
Sworn before me this 24<sup>th</sup> day  
of SEPTEMBER A.D. 20 17  
Leanne C. Mackenzie  
A Notary Public, A Commissioner for Oaths  
in and for the Province of Alberta

LEANNE C. MACKENZIE  
A Commissioner for Oaths  
in and for Alberta  
My Commission Expires Apr. 3, 2019

From: Crista Osualdini [mailto:cosualdini@mross.com]

Sent: Tuesday, August 29, 2017 11:12 AM

To: Bonora, Doris; Karen Platten

Cc: Nancy Cumming; Dave Risling

Subject: RE: sawridge and Catherine Twin costs application

Thanks Doris. As you can appreciate, we are focusing this week on the brief which is due on Friday. In addition, Karen is away until next week.

We will be in touch next week with our client's position on this issue.



Crista Osualdini | Partner | direct 780.482.9239 | toll free 1.800.567.9200 | fax 780.733.9723  
McLennan Ross LLP | [www.mross.com](http://www.mross.com) | BIOGRAPHY  
600 McLennan Ross Building, 12220 Stony Plain Road, Edmonton, AB T5N 3Y4



**From:** Nancy Cumming [mailto:necumming@bryanco.com]  
**Sent:** 14-Sep-17 9:36 AM  
**To:** Crista Osualdini; Bonora, Doris; Karen Platten  
**Cc:** Dave Risling  
**Subject:** RE: sawridge and Catherine Twin costs application

We continue to await your position on the Confidentiality Order. Your client continues to attach confidential information to her affidavits and her answers to undertakings. Is there a reason why your office has not responded to this issue, especially considering the fact that a draft Order was provided to you several months ago?  
Please respond.

Nancy Cumming

**Nancy E. Cumming, Q.C.**  
Lawyer

An international member of

**Ailly Law**

EMAIL [necumming@bryanco.com](mailto:necumming@bryanco.com)



**Bryan & Company LLP**  
2600 Manulife Place 10180 101 Street Edmonton Alberta T5J 3Y2  
Direct 780-420-4733 | Toll free 1 800 357 9265 | Fax 780 428 6324  
Web [www.bryanco.com](http://www.bryanco.com)

This is Exhibit "D" referred to in the  
Affidavit of  
ANNAR HIRANI  
Sworn before me this 21<sup>st</sup> day  
of SEPTEMBER A.D., 2017  
Leanne Mackenzie  
A Notary Public, A Commissioner for Oaths  
in and for the Province of Alberta

**LEANNE C. MACKENZIE**  
A Commissioner for Oaths  
in and for Alberta  
My Commission Expires Apr. 3, 2019