

Appendix “B”

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF MAPLE BANK GmbH

AND IN THE MATTER OF THE *WINDING-UP AND RESTRUCTURING ACT*,
R.S.C. 1985, C.W-11, AS AMENDED

AND IN THE MATTER OF THE *BANK ACT*, S.C. 1991, C.46, AS AMENDED

BETWEEN:

ATTORNEY GENERAL OF CANADA

Applicant

and

MAPLE BANK GmbH

Respondent

THE
SUPPLEMENT TO THE SIXTEENTH REPORT OF KPMG INC. IN ITS CAPACITY
AS
COURT APPOINTED LIQUIDATOR OF THE BUSINESS IN CANADA OF MAPLE
BANK GMBH AND ITS ASSETS AS DEFINED IN SECTION 618 OF THE *BANK*
ACT

June 13, 2024

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1. INTRODUCTION AND PURPOSE OF THE SUPPLEMENTAL REPORT

BACKGROUND

1. This report (the “**Supplemental Report**”) is supplemental to the sixteenth report to the Court of the Liquidator of the Toronto Branch of Maple Bank GmbH (the “**Sixteenth Report**”), and is being provided to the Court further to the endorsement of Associate Justice Ilchenko dated April 25, 2024 (the “**April 25 Endorsement**”).
2. Copies of the Sixteenth Report and the April 25 Endorsement are attached hereto as **Appendix “A”** and **Appendix “B”**, respectively.
3. Capitalized terms used herein and not otherwise defined have the meanings ascribed thereto in the Sixteenth Report.

PURPOSE OF THE LIQUIDATOR’S SUPPLEMENTAL REPORT

4. The purpose of this Supplemental Report is to provide information to the Court in respect of the fees of the Liquidator and its counsel, BLG, and the realizations of the Toronto Branch estate, as requested by Associate Justice Ilchenko in the April 25 Endorsement, thereby assisting Associate Justice Ilchenko with his review and assessment of the fees of the Liquidator and BLG pursuant to the Data Custodian Extension Order.

TERMS OF REFERENCE AND DISCLAIMER

5. Unless otherwise indicated, all references to monetary amounts herein are denominated in Canadian dollars (“**CAD**”).
6. Copies of the Liquidator’s Court reports and all motion records and Orders in these proceedings are available on the Liquidator’s website at <http://www.kpmg.com/ca/maplebank>.

2. **PROFESSIONAL FEES AND ESTATE REALIZATIONS**

7. The table below is an analysis of the fees of the Liquidator and its counsel as a percentage of the realizations of the Toronto Branch estate for the following periods:
- February 16, 2016 to July 31, 2017, being the period for which the fees of Liquidator and its counsel have been taxed by the Court;
 - August 1, 2017 to January 31, 2024, being the period for which the Liquidator is seeking approval of the fees of the Liquidator and its counsel; and
 - February 16, 2016 to January 31, 2024.

KPMG Inc., in its capacity as Liquidator of Maple Bank GmbH (Toronto Branch)			
Professional Fees and Disbursements of the Liquidator and its Counsel, and Estate Realizations			
\$CAD			
Period	February 16, 2016 - July 31, 2017	August 1, 2017 - January 31, 2024 ⁽¹⁾	February 16, 2016 - January 31, 2024
Professional Fees of the Liquidator	5,598,504	2,166,391	7,764,895
Disbursements of the Liquidator	369,503	45,849	415,352
HST	775,841	287,591	1,063,432
Total Professional Fees of the Liquidator	6,743,848	2,499,831	9,243,680
Professional Fees of the Liquidator's counsel	3,451,269	1,383,135	4,834,404
Disbursements of the Liquidator's counsel	65,720	11,456	77,176
HST	456,416	181,071	637,487
Total Professional Fees of the Liquidator's counsel	3,973,405	1,575,662	5,549,066
Total Professional Fees ⁽²⁾	(A) 10,717,253	4,075,493	14,792,746
Receipts	(B) 1,240,043,804	3,226,263	1,243,270,068
Professional Fees as a % of Estate Realizations	(C) / (B) 0.86%	126.32%	1.19%
Professional Fees as a % of Hybrid Estate Realizations ⁽³⁾⁽⁴⁾	0.86%	17.69%	1.17%

⁽¹⁾ The Liquidator's fees are for the period August 1, 2017 to December 2023 and the Liquidator's Counsel's fees are for the period August 1, 2017 to January 31, 2024.

⁽²⁾ Total professional fees in the table above (\$14.8M) are less than total professional fees in the Statement of Receipts and Disbursements (\$16.2M), as the former includes only the fees of the Liquidator and its counsel, while the latter includes the fees of other professional advisors engaged by the Liquidator in connection with the liquidation (e.g. tax advisors, U.S. legal counsel, etc).

⁽³⁾ Professional Fees as a % of Hybrid Realizations considers a \$19.8M increase to Estate Realizations, as outlined in Note 4 below.

⁽⁴⁾ On September 12, 2016, the CRA filed a claim with the Liquidator in respect of unremitted corporate income taxes of \$11.7M, which included applicable interest and penalties up to February 16, 2016 (i.e. the Winding-Up Date). The Liquidator and its counsel have disputed CRA's initial claim, filed a formal tax appeal with the Tax Court of Canada, and had extensive settlement discussions with the CRA, ultimately resulting in the Liquidator and the CRA reaching a settlement agreement. In accordance with the settlement agreement, the Liquidator anticipates receiving a net refund of approximately \$3.5M. \$19.8M (i.e. the delta between the CRA's initial claim of \$11.7M plus interest in accordance with the Winding-up and Restructuring Act that would have otherwise accrued thereon, and the Liquidator's anticipated refund of \$3.5M) as this is the net amount that accrued to the estate as a result of the Liquidator's efforts in dealing with this issue. This is summarized in the calculation below:

CRA Claim	
Tax	10,981,258.49
Interest	623,084.28
Penalties	69,783.39
Total unremitted corporate tax liability	11,674,126.16
Total taxes owing as of February 16, 2016	11,674,126.16
Interest rate at 5% per Winding-up and Restructuring Act	4,597,586.67
Total taxes (including interest) owing as of December 31, 2023	16,271,812.83
Estimated tax refund from the CRA, pursuant to the settlement agreement	(3,536,046.18)
Net Tax Recovery	19,807,859.01

A substantial portion of the fees and disbursements of the Liquidator and its Counsel incurred during the period August 1, 2017 to January 31, 2024 relate to the Liquidator's dealings with the CRA on this issue.

3. **STATEMENT OF RECEIPTS AND DISBURSEMENTS**

8. The Liquidator's statement of receipts and disbursements for the periods of (i) February 16, 2016 to July 31, 2017, (ii) August 1, 2017 to January 31, 2024, and (iii) February 16, 2016 to January 31, 2024, is included below.

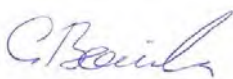
KPMG Inc., in its capacity as Liquidator of Maple Bank GmbH (Toronto Branch)			SCAD millions
Statement of Receipts and Disbursements ⁽¹⁾			
Period	February 16, 2016 - July 31, 2017	August 1, 2017 - January 31, 2024	February 16, 2016 - January 31, 2024
CED and Securities	489.6	-	489.6
Structured Loan Portfolio	357.4	-	357.4
MBS Business	176.5	-	176.5
Related Party Settlements	84.3	-	84.3
Settlement of Brokerage Account	64.7	-	64.7
Derivative Instruments	59.6	-	59.6
Miscellaneous/Other	7.9	3.3	11.2
Total Receipts	1,240.0	3.3	1,243.3
Payroll	2.7	-	2.7
General and Administrative	1.9	1.3	3.2
Occupancy Rent	0.4	-	0.4
Transfer to CMHC	0.3	-	0.3
Total Operating Disbursements	5.3	1.3	6.6
GIA Distribution	658.0	122.0	780.0
Distribution to Proven Creditors, with interest	732.8	9.0	741.8
Professional Fees ⁽²⁾	11.2	5.1	16.2
Net Disbursements in excess of Receipts	(167.2)	(134.2)	(301.4)
Opening Cash Balance	316.1	148.9	316.1
Closing Cash and Cash Equivalents Balance	148.9	14.7	14.7

⁽¹⁾ Certain totals above may not foot due to rounding of underlying figures.

⁽²⁾ Professional fees include KPMG and various other professional service firms.

All of which is respectfully submitted at Toronto, Ontario this 13th day of June, 2024.

KPMG Inc., in its capacity as Court Appointed Liquidator of the Business in Canada of Maple Bank GmbH and its Assets as defined in Section 618 of the *Bank Act*

Per: 
George Bourikas
Vice-President

Appendix A

ONTARIO
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THE

SIXTEENTH REPORT OF KPMG INC. IN ITS CAPACITY AS

COURT APPOINTED LIQUIDATOR OF THE BUSINESS IN CANADA OF MAPLE
BANK GMBH AND ITS ASSETS AS DEFINED IN SECTION 618 OF THE *BANK*
ACT

February 28, 2024

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1. INTRODUCTION AND PURPOSE OF THE SIXTEENTH REPORT

BACKGROUND

1. Maple Bank GmbH (“**Maple Bank**”) is a Canadian-owned German bank, and an authorized foreign bank in Canada under Section 2 and Part XII.1 of the *Bank Act* (an “**Authorized Foreign Bank**”). In Germany, Maple Bank is subject to regulation by the Federal Financial Supervisory Authority (“**BaFin**”). As an Authorized Foreign Bank, Maple Bank was regulated with respect to its business in Canada (the “**Toronto Branch**”) by the Office of the Superintendent of Financial Institutions (“**OSFI**”).
2. As more fully described in the Liquidator’s first report to this Court dated March 2, 2016 (the “**First Report**”), in the period leading up to the commencement of the *Winding-up and Restructuring Act* (“**WURA**”) proceeding, the Toronto Branch had three major lines of business: (i) the origination and securitization of real property mortgages in Canada; (ii) structured secured lending; and (iii) security financing transactions (collectively, the “**Business**”).
3. The emergence of significant German tax claims against Maple Bank and the resulting indebtedness of Maple Bank led to:
 - i. BaFin imposing a moratorium on Maple Bank’s business activities, which caused Maple Bank to cease business and institute insolvency proceedings in Germany;
 - ii. The appointment of a German insolvency administrator (the “**GIA**”) over Maple Bank;
 - iii. The issuance of default notices and the termination of agreements by financial institutions that were counterparties to financial contracts (primarily swaps and hedging instruments) with the Toronto Branch in respect of their dealings with Maple Bank’s Business in Canada;

- iv. Canada Mortgage and Housing Corporation, after the issuance of a default notice to Maple Bank, taking control of the mortgage backed securities business of the Toronto Branch and the corresponding mortgage pools (totaling approximately \$3.5 billion); and
 - v. OSFI issuing orders under section 619 of the *Bank Act* for the taking of control of the assets of Maple Bank in respect of the Business.
4. The events described above prompted OSFI to request that the Attorney General of Canada seek a winding-up order pursuant to section 10.1 of the WURA in respect of the Business. On February 16, 2016, Regional Senior Justice Morawetz of the Ontario Superior Court of Justice [Commercial List] (the “**Court**”) granted an order (the “**Winding-Up Order**”) to, among other things, (i) wind-up the Business; and (ii) appoint KPMG Inc. (“**KPMG**”) as liquidator (the “**Liquidator**”) of the Business and of the assets of Maple Bank as defined in section 618 of the *Bank Act* (the “**Assets**”).
5. The Liquidator has, under the supervision of the Court, subsequently realized upon substantially all of the Assets, run a claims process and paid all of the liabilities of the Toronto Branch, and made four interim distributions to the GIA. The only remaining substantive issues the Liquidator is dealing with are the receipt of a refund from the Canada Revenue Agency (the “**CRA**”) related to various tax appeals and the GIA’s request that the records of the Toronto Branch and Maple Securities Canada Limited (“**MSCL**”) be transferred to it in Germany. The Liquidator’s activities for the period up to August 20, 2021, and various Court Orders requested in connection thereto, are outlined in reports of the Liquidator numbered One through Fifteen, which are available on the Liquidator’s website at <http://www.kpmg.com/ca/maplebank>.
6. Pursuant to an Order dated June 8, 2016, the Court appointed Jonathan Wigley of the law firm Gardiner Roberts LLP as Independent Cost Counsel (the “**ICC**”) to review the fees and disbursements (collectively the “**Professional Fees**”) of the Liquidator and its counsel; Gowling WLG (Canada) LLP (“**Gowling**”), and to report to the Court (the “**ICC Report**”) with respect to the fairness and reasonableness of the Professional Fees (the “**ICC Order**”). A copy of the ICC

Order is attached hereto as **Appendix “A”**.

7. Pursuant to an Order dated March 10, 2017, the Court approved the Professional Fees of the Liquidator and Gowling for the period February 16, 2016 to November 30, 2016, along with the related ICC Report and the activities of the ICC (the **“March 2017 Distribution Order”**). The March 2017 Distribution Order also expanded the scope of the ICC’s responsibilities to include reviewing the fees and disbursements of Borden Ladner Gervais LLP (**“BLG”**), who had become the Liquidator’s primary legal counsel. A copy of the March 2017 Distribution Order is attached hereto as **Appendix “B”**.
8. Pursuant to an Order dated September 26, 2017, the Court approved the Professional Fees of the Liquidator and its counsel; BLG, for the period November 30, 2016 to July 31, 2017, along with certain fees of Gowlings related to various tax and transaction matters (the **“September 2017 Distribution Order”**). The September 2017 Distribution Order also approved the related ICC Report and the activities of the ICC. A copy of the September 2017 Distribution Order is attached hereto as **Appendix “C”**.
9. Due to the unexpected death of Mr. Wigley, on March 2, 2020, the Court issued an Order, (the **“Second ICC Order”**) pursuant to which Mr. Ilchenko, a lawyer at Pallett Valo LLP, was appointed as the replacement ICC. The ICC was ordered to review the fees and disbursements of the Liquidator and its counsel and make submissions to the Court with respect to the fairness and reasonableness of the Professional Fees and whether the Professional Fees ought to be assessed and allowed by the Court as filed. A copy of the Second ICC Order is attached hereto as **Appendix “D”**.
10. Thereafter, Mr. Ilchenko commenced a review of certain KPMG and BLG invoices covering the period subsequent to those last approved by the Court (i.e. subsequent to July 31, 2017) but did not complete the review prior to his appointment to the bench.
11. On August 16, 2021, Mr. Ilchenko was sworn in as a Bankruptcy Registrar (the **“Registrar”**) for Toronto. As a result of this appointment, Mr. Ilchenko was no longer able to continue as ICC.

12. Pursuant to an Order dated August 26, 2021, the Court, *inter alia*, discharged Mr. Ilchenko as ICC, *nunc pro tunc*, effective August 16, 2021 and authorized him, in his capacity as Registrar, to continue and complete his review and assessment of the fees and disbursements of the Liquidator and its counsel including the completion of the ICC Report (the “**Data Custodian Extension Order**”). The Data Custodian Extension Order also permitted the Registrar, in furtherance of conducting such review and assessment, to access any and all documents and materials previously utilized by the ICC. A copy of the Data Custodian Extension Order is attached hereto as **Appendix “E”**.

PURPOSE OF THE SIXTEENTH REPORT

13. The purpose of this Sixteenth Report (the “**Sixteenth Report**”) is to provide information to the Court in respect of:
- i. The Liquidator’s Professional Fees from August 1, 2017 to December 31, 2023; and
 - ii. The Professional Fees of the Liquidator’s Counsel; BLG from August 1, 2017 to January 31, 2024

thereby assisting Associate Justice Ilchenko with his review and assessment of the Professional Fees of the Liquidator and its counsel; BLG, pursuant to the Data Custodian Extension Order.

TERMS OF REFERENCE AND DISCLAIMER

14. Capitalized terms not defined in the Sixteenth Report are as defined in either the Winding-Up Order and/or the First Report through the Fifteenth Report. Unless otherwise indicated, all references to monetary amounts herein are denominated in Canadian dollars (“**CAD**”). Copies of the Liquidator’s Court reports and all motion records and Orders in these proceedings are available on the Liquidator’s website at <http://www.kpmg.com/ca/maplebank>.

2. THE LIQUIDATOR'S PROFESSIONAL FEES

SUMMARY OF PROFESSIONAL FEES

15. A summary of the Liquidator's accounts for the period August 1, 2017 to December 31, 2023 (the "**Fee Period**") is outlined below:

Hours	3,395.35 hours
Fees	\$2,166,391.00
Disbursements	\$45,848.99
HST	\$287,591.25
Total	\$2,499,831.24
Average Rate per Hour	\$638.05 / hour

A summary of the Liquidator's accounts for the Fee Period, including both Phase 1 and Phase 2 (each term as defined herein) is attached hereto and marked as **Appendix "F"**. Actual invoice copies are attached in the fee affidavit of Nicholas Brearton (defined and referenced below).

16. The Liquidator has split its activities in respect of the winding up of Toronto Branch into two parts; (a) those related to the transfer of certain Toronto Branch digital data to the GIA ("**Phase 2**") and (b) all other activities ("**Phase 1**").
17. With respect to the Phase 2 activities, only those activities related to the analysis of digital data which the GIA had requested be transferred to it, along with the identification and exclusion of specific data as requested by certain DTO Stakeholders (as defined below), all pursuant to the Data Transfer Order dated January 26, 2024 (the "**Data Transfer Order**") were included. For clarity, the Liquidator's activities associated with the transfer of undisputed physical and digital data (as outlined in paragraph 21 (viii) below) to the GIA (also pursuant to the Data Transfer Order), along with the Liquidator's activities associated with the Data Custodian Order dated July 23, 2020, as subsequently extended, (the "**Data Custodian Order**") were included in Phase 1. Copies of the Data Transfer Order

and the Data Custodian Order are attached hereto as **Appendices “G” and “H”** respectively.

18. The separate tracking of activities associated with Phase 2 was necessary to preserve the ability to allocate these fees, if determined appropriate, to the various parties who had an interest in the data the GIA sought to have transferred to it. However, we understand that the GIA has subsequently agreed with these parties that these fees will be paid by the estate of Toronto Branch.
19. The fee summaries and tables presented herein have been assembled based on KPMG’s fiscal year, which runs from October 1 to September 30. In the case of invoices that straddle two fiscal years (there were only four such invoices which involved periods prior to October 1, 2020), the hours, fees, disbursements and taxes were allocated to their respective fiscal year.

PHASE 1 SUMMARY AND DESCRIPTION OF ACTIVITIES

20. Attached hereto and marked as **Appendix “T”** is a summary of each professional’s hourly rate by fiscal year for Phase 1 of the Fee Period. Additionally, attached hereto and marked as **Appendix “J”** is a summary of the Liquidator’s accounts for Phase 1 of the Fee Period by fiscal year including the average hourly rate. An overview of the Liquidator’s accounts for Phase 1 of the Fee Period, is outlined below:

Hours	2,857.50 hours
Fees	\$1,855,875.00
Disbursements	\$45,716.39
HST	\$247,206.92
Total	\$2,148,798.31
Average Rate per Hour	\$649.48 / hour

21. A high-level description of the Liquidator’s Phase 1 activities during the Fee Period is outlined below.

- i. Reviewing submitted proof of claim forms and settling claims pursuant to the Claims Procedure Order, including:
 - a. Settlement of the Global One Financial Inc. claim;
 - b. Settlement of the Radius Financial Inc. (and related entities) claim;
 - c. Settlement of the Non-Executives Employees' claims; and
 - d. Settlement of the Executives Employees' claims.

Each claim settlement listed above involved the review and subsequent counterparty negotiation of a written settlement agreement.

- ii. Establishing appropriate reserves to provide for unproven claims, possible future claims, outstanding tax liabilities, and costs of these Liquidation proceedings;
- iii. Issuing interim distributions to the GIA, and publishing their respective notice of distribution to creditors, as detailed below:
 - a. A distribution of approximately \$91.4 million CAD was made on September 27, 2017, in accordance with the September 2017 Distribution Order;
 - b. A distribution of approximately \$5.0 million CAD was made on December 13, 2017, in accordance with the Third Interim Distribution Order; and
 - c. A distribution of approximately \$25.7 million CAD was made on August 5, 2020, in accordance with the Fourth Interim Distribution Order.
- iv. Liaising with the CRA and their legal counsel; Department of Justice (the “**DOJ**”), to settle the Initial CRA Claims and the Amended CRA Claim (collectively, the “**CRA Claims**”). This included, among other things:
 - a. Delivering to the DOJ a settlement proposal in respect of the CRA Claims;
 - b. Filing administrative appeals (i.e objections) to the CRA's position

- with respect to amounts owing;
- c. Filing a Notice of Appeal and subsequently a second Notice of Appeal (collectively, the “**Tax Appeal**”) with the Tax Court of Canada should a settlement on the CRA claims not be reached with the CRA;
 - d. Filing an Amended Notice of Appeal on April 12, 2018, and a Notice of Objection on May 23, 2018;
 - e. In conjunction with the CRA, requesting the Tax Court of Canada amend the timetable associated with the Tax Appeal;
 - f. Responding, with the assistance of the former Toronto Branch CFO and the Liquidator’s counsel; BLG, to the CRA’s written questions made pursuant to examination for discovery;
 - g. Working with the CRA to reach an omnibus settlement in respect of all amounts owing to/due from the CRA that were subject to the Tax Appeal as subsequently amended. This included demonstrating to the CRA, with the assistance of Ernst & Young LLP (“**EY**”), that the Liquidator’s proposed settlement amounts were complete and accurate;
 - h. Negotiating with the CRA the written agreement settling all matters subject to the Notice of Appeals filed with the Tax Court of Canada as subsequently amended;
 - i. Discussing with the CRA the Interest Stops Issue (i.e. the interest owing to the CRA on Toronto Branch’s unpaid taxes after it entered into liquidation proceedings), resulting in a settlement of the dispute;
 - j. Reviewing the CRA’s draft refund calculations and, with the assistance of EY, providing to the CRA the Liquidator’s comments on same; and
 - k. Communicating with the GIA on developments associated with the Tax Appeal and the Interest Stops Issue, including material actions to be taken.

- v. Reviewing and filing various tax returns on behalf of Toronto Branch including:
 - a. The 2015 to 2023 T2 Corporate Income Tax Returns;
 - b. The 2019 and 2020 GST/HST Returns; and
 - c. The self assessed GST for 2021 to 2023.
- vi. Preparing financial statements for Toronto Branch and providing audit support to the German auditor of Maple Bank for the years ended September 30, 2015 up to and including 2021;
- vii. Preparing and/or reviewing various Court reports and motion materials, and attending associated Court hearings, as follows:
 - a. Filing the Twelfth Report of the Liquidator on September 19, 2017;
 - b. Preparing content requested by the Independent Cost Counsel for his Second Report;
 - c. Attending Court and subsequently obtaining the September 2017 Distribution Order dated September 26, 2017;
 - d. Filing the Thirteenth Report of the Liquidator on December 8, 2017;
 - e. Filing the Supplement to the Thirteenth Report dated December 12, 2017;
 - f. Attending Court and subsequently obtaining the Third Interim Distribution Order dated December 13, 2017;
 - g. Filing the Second Supplement to the Thirteenth Report of the Liquidator dated January 25, 2018;
 - h. Attending Court and subsequently obtaining the Data Transfer Order dated January 26, 2018;
 - i. Attending Court and subsequently obtaining the Second ICC Order dated March 2, 2020;
 - j. Filing the Fourteenth Report of the Liquidator on July 17, 2020;

- k. Attending Court and subsequently obtaining the Fourth Interim Distribution Order and the Data Custodian Order dated July 23, 2020;
 - l. Filing the Fifteenth Report of the Liquidator on August 20, 2021; and
 - m. Attending Court and subsequently obtaining the Data Custodian Extension Order dated August 26, 2021;
- viii. Transferring certain books and records of Toronto Branch which were in the power, possession or control of the Liquidator to the GIA as outlined in the Data Transfer Order. Pursuant to the Order, the Liquidator:
 - a. Transferred to the GIA on February 2, 2018, all digital records of the Toronto Branch stored on the Global One Database;
 - b. Transferred to the GIA on February 21, 2018, all physical records of the Toronto Branch stored at the Recall Facility; and
 - c. Transferred to the GIA on February 2, 2018, all data stored in the Laserfiche system that relates solely to the Master Agreements for Securities Lending and Repo transactions for the Toronto Branch;
- ix. Acting in its capacity as the Data Custodian, pursuant to the Data Custodian Order and Data Custodian Extension Order, which among other things, included taking into its power, possession and control the Custodial Data (this included those Toronto Branch records not already transferred to the GIA along with the records of MSCL, an affiliated entity that was wound up outside of a formal insolvency process), and receiving an assignment of existing service agreements.
- x. At the request of the GIA, assembling and subsequently providing to them the documentation associated with approximately three hundred security lending transactions involving German publicly traded stocks and having Toronto Branch or MCSL as counterparty;
- xi. Considering a request from the GIA to transfer all of the remaining Toronto Branch and MSCL data being held by the Data Custodian (including comingled data of affiliated entities such as Maple Financial Group Inc

(“**MFGI**”) and personal data of employees and customers) to the custody of GIA, with the data to be stored in Germany. Activities performed included the following;

- a) Identifying, with the assistance of BLG, issues associated with the data transfer and subsequently agreeing to a process with the GIA to attempt to resolve them;
 - b) Reviewing, in conjunction with BLG, a draft legal opinion provided by the GIA’s German legal counsel regarding data protections under German law that are applicable to the data proposed to be transferred to the GIA;
 - c) Discussing with BLG the data protections afforded under German law as compared to Canadian law;
 - d) Assisting BLG in the development of a protocol between the GIA and the Data Custodian that would govern the transfer of the data to the GIA. This subsequently evolved into a draft order that the Liquidator would seek from the Court; and
 - e) Discussing the draft protocol details, and subsequently the draft order, with the GIA and its Canadian counsel, which discussions are still ongoing; and
- xii. Carrying out the day-to-day administration of the estate of Toronto Branch including the following;
- a. Continuing to manage the assets of the estate of Toronto Branch;
 - b. Investing cash holdings in order to preserve value for the creditors of Toronto Branch;
 - c. Communicating with Toronto Branch’s creditors and suppliers regarding the liquidation of Toronto Branch;
 - d. Arranging for payment of the costs associated with the liquidation of Toronto Branch; and
 - e. Maintaining an accounting of the financial activities of the Liquidator.

22. The Liquidator notes that the issues associated with both the tax disputes with the CRA and the GIA's request that all remaining Toronto Branch and MSCL data held by the Data Custodian be transferred to it in Germany, which issues have dominated the Liquidator's activities during much of the Fee Period, are very complex, necessitating the involvement of senior KPMG professionals.

PHASE 2 SUMMARY AND DESCRIPTION OF ACTIVITIES

23. Attached hereto and marked **Appendix "K"** is a summary of each professional's hourly rate by fiscal year for Phase 2 of the Fee Period. Additionally, attached hereto and marked as **Appendix "L"** is a summary of the Liquidator's accounts for Phase 2 of the Fee Period by fiscal year including the average hourly rate. An overview of the Liquidator's accounts for Phase 2 of the Fee Period is outlined below:

Hours	537.85 hours
Fees	\$310,516.00
Disbursements	\$132.60
HST	\$40,384.33
Total	\$351,032.93
Average Rate per Hour	\$577.33 / hour

24. A high-level description of the Liquidator's Phase 2 activities during the Fee Period is outlined below.
- Understanding the structure and quantum of, and ability to search, the Toronto Branch digital data that the GIA was seeking to have transferred to it, and subsequently providing this information to the GIA, Deloitte Restructuring Inc in its capacity as trustee in bankruptcy of MFGI ("**MFGI Trustee**"),

Ontario Teachers Pension Plan (“**OTPP**”) and National Bank of Canada (“**NB**”);

- ii. Developing the Data Scrubbing Process, in conjunction with MSCL, to:
 - a. Identify certain databases that contain personal information;
 - b. Identify certain folders within the Shared Files Database that could potentially contain personal information; and
 - c. Prepare a list of reports/documents that Toronto Branch employees used as part of their job performance, and which included personal information.
- iii. Removing folders and files that contain personal information pursuant to the Data Scrubbing Process (the data with personal information removed being defined as the “**Data Set**”);
- iv. Indexing the data associated with the Data Set to render it searchable, with consultation with the GIA, MSCL, OTPP, NB, and MFGI Trustee (collectively, the “**DTO Stakeholders**”);
- v. Reviewing the Data Set, consisting of both email and financial information in various electronic formats, and dividing it into two subsets (referred to as the Non-Database Files and Database Files);
- vi. Applying search terms supplied by OTPP and NB to identify documents within the Non-Database Files that were to be segregated (the “**Segregated Data**”) and not transferred to the GIA pending agreement amongst the OTPP, NB and the GIA;
- vii. Providing the GIA with a hard drive containing a copy of the Non-Database Files excluding the Segregated Data (the “**First Interim Transfer**”) on September 24, 2018;
- viii. Providing to the DTO Stakeholders certain information regarding the Database Files, including the contents of the various databases, and subsequently liaising with them regarding information they were concerned with the GIA being transferred; and

- ix. Providing the GIA with a hard drive containing a copy of a subset of Database Files (the “**Second Interim Transfer**”) on March 11, 2019.

SUMMARY OF DISBURSEMENTS

- 25. The disbursements during the Fee Period were primarily associated with the following:
 - i. \$36,799 in disbursements related to data processing fees from a software tool called Nuix with fees that vary between months based on the volume of data that is loaded into Nuix; and
 - ii. \$8,890 in disbursements related to advertisements in the Wall Street Journal and Globe and Mail regarding proposed interim distributions to the GIA.

While these expenses have been invoiced to Phase 1, they actually relate to Phase 2.

OTHER MATTERS

- 26. Attached hereto and marked as **Appendix “M”** are pie charts that depict the KPMG hours and work distribution for the fiscal periods related to Phase 1, Phase 2, and the Fee Period.
- 27. Attached hereto as **Appendix “N”** is the fee affidavit of Nicholas Brearton sworn on February 27, 2024 in respect of the Liquidator’s accounts for the Fee Period.

3. ***BLG's PROFESSIONAL FEES***

SUMMARY OF PROFESSIONAL FEES

28. A summary of the BLG's accounts for the period August 1, 2017 to January 31, 2024 (the "**BLG Fee Period**") is outlined below:

Hours	1,837.20 hours
Fees	\$1,383,135.00
Disbursements	\$11,455.88
HST	\$181,070.78
Total	\$1,575,661.66

29. During the BLG Fee Period, BLG rendered various services in its capacity as counsel to the Liquidator, including but not limited to:

- i. Activities related to the liquidation and winding-up of Maple Bank:
 - a. Advising upon and preparing all necessary settlement agreements and supporting documents regarding settlements with Global One Financial Inc., Radius Financial Inc. (and related entities), MFGI, and Maple Bank's Non-Executive and Executive Employees in Canada;
 - b. Preparing for and attending Court regarding various interim distribution orders, data protocol orders, and data transfer orders, including drafting all necessary motion materials and assisting the Liquidator in preparation of its Court reports;
 - c. Attending conference calls and corresponding via email with the Liquidator, the GIA, various creditors, and their respective counsels regarding settlement negotiations, claims, motions, and distribution orders;
 - d. Conducting legal research and analysis, including (1) review of legislation and caselaw and (2) review of data sharing protocols and

- related mandates, and prepare memoranda and legislative comparative charts summarizing analysis and recommendations;
- e. Reviewing and revising the draft Data Transfer Order, and attending conference calls with the Liquidator, the GIA and their counsel, and various other parties regarding same;
 - f. Preparing for and attending Court regarding appointment of the independent cost officer, including drafting all necessary materials;
 - g. Advising the Liquidator regarding its role of the Data Custodian and issues surrounding same;
 - h. Reviewing and revising the ICC report, including preparation of the draft fees affidavit and review of fee invoices appended thereto; and
 - i. Corresponding internally, with the Liquidator, GIA, various creditors and their respective counsels to discuss general matters related to the wind-up of the Toronto Branch.
- ii. Activities related to tax-related matters of Maple Bank:
- a. Attending conference calls and corresponding with the Liquidator and other counsel regarding CRA taxation issues, appeals, and settlement;
 - b. In preparation for CRA's appeal before the Tax Court of Canada: (1) reviewing tax and mortgage documents and other supporting documentation, (2) liaising with CRA and DOJ regarding settlement of appeal, and (3) drafting and revising all court materials, including objections;
 - c. Corresponding with the Liquidator and EY regarding tax issues and timetable associated with the Tax Appeal; and
 - d. Reviewing and revising CRA settlement documents and correspond with the DOJ regarding settlement.
- iii. Activities related to the disposition of data:
- a. Conducting legal research and analysis related to data transfers,

retention of data, privacy issues, and conflicts of law, including review of legislation and caselaw, and prepare memoranda and legislative comparative charts summarizing analysis and recommendations;


- b. Corresponding with the Liquidator, the GIA and their counsel regarding data custodian and record issues;
 - c. Drafting foreign law opinion regarding data issues and corresponding internally, with the Liquidator, GIA and their counsel regarding same;
 - d. Drafting and revise letter to stakeholders providing notice regarding disposition of Canadian data held in Germany; and
 - e. Preparing for motion to approve data disposition, including drafting motion materials.
30. The issues addressed by BLG, particularly with regard to the tax disputes with CRA and the GIA's request that all remaining data belonging to the Toronto Branch and MSCL, as currently held by the Data Custodian, be transferred to Germany, are complex and have required the ongoing involvement of partners at senior level who have the required level of expertise to address these issues.
31. Attached hereto as **Appendix "O"** is the affidavit of Bevan Brooksbank sworn on February 28, 2024 in respect of BLG's accounts for the BLG Fee Period.

4. LIQUIDATOR'S RECOMMENDATIONS

32. The Liquidator submits this Sixteenth Report to the Court in support of the Liquidator's Professional Fees for the Fee Period and BLG's Professional Fees for the BLG Fee Period.
33. The Liquidator has reviewed the BLG accounts and confirms that the services reflected therein have been duly authorized and rendered and that, in the Liquidator's opinions, the Professional Fees are reasonable.

All of which is respectfully submitted at Toronto, Ontario this 28th day of February, 2024.

**KPMG Inc., in its capacity as Court Appointed Liquidator of the
Business in Canada of Maple Bank GmbH and its Assets as defined in
Section 618 of the *Bank Act***

Per: 
George Bourikas
Vice-President

Appendix B

April 25th, 2024

Alexander L. MacFarlane and Nick Hollard for BLG, counsel to KPMG Inc. ("BLG")

Nicholas Brearton LIT for KPMG Inc. Liquidator and Data Custodian (the "Liquidator") for Maple Bank BmbH ("MBTOR")

Maria Konyukhova for GIA


The 16th Report and the appended exhibits, and the Factum of the Liquidator are excellent and have the required backup documentation and jurisprudence.

It would assist the Court if the 16th Report, the Factum and the Affidavits of Nicholas Brearton and Bevan Brooksbank (all without exhibits) be sent to the Court in Word format to the Bankruptcy Court Office by email to my attention.

It would also be helpful if the Liquidator provide a realization analysis of the realization in this Fee Period against the prior fee period, and the total fees and disbursements in both periods with fees expressed as a % of realization in each period, and also over the total life of the Liquidation.

If a "statement of receipts and disbursements" type of document has been prepared as a preliminary to future court hearings, for this Fee Period, that would also be helpful to assist in setting the context over the last 6 years for the activity.

If the Liquidator could provide this to me through the Bankruptcy Court Office by email by June 14th, 2024 that would also be helpful.

A handwritten signature in black ink, appearing to read 'ILCHENKO', with a long horizontal line extending to the right.

ASSOCIATE JUSTICE ILCHENKO

Appendix “C”

KPMG Inc., in its capacity as Liquidator Professional Fees for the Period from August 1, 2017 to June 30, 2024									\$CAD
Invoice Number	Invoice Date	Period	Phase	Hours	Professional Fees	Disbursements	HST	Total	
8001729979	September 29, 2017	August 1 to 31, 2017	Phase 1	90.80	57,196.50	4,162.57	7,976.68	69,335.75	
8001783325	November 21, 2017	September 1 to 30, 2017	Phase 1	147.10	103,227.00	13,052.77	15,116.37	131,396.14	
8001783323	November 21, 2017	October 1 to 31, 2017	Phase 1	87.25	63,224.00	4,062.57	8,747.25	76,033.82	
8002035848	May 13, 2018	November 1 to November 30, 2017	Phase 1	144.90	85,337.50	4,062.57	11,622.01	101,022.08	
8002035849	May 13, 2018	December 1 to December 31, 2017	Phase 1	171.10	118,064.00	4,097.95	15,881.05	138,043.00	
8002035847	May 13, 2018	January 1 to January 31, 2018	Phase 1	272.90	173,993.50		22,619.16	196,612.66	
8002160890	August 07, 2018	February 1 to February 28, 2018	Phase 1	94.90	60,156.00	4,062.57	8,348.41	72,566.98	
8002165619	August 10, 2018	March 1 to March 31, 2018	Phase 1	32.20	19,433.00	8,152.82	3,586.16	31,171.98	
8002257256	October 25, 2018	April 1 to April 30, 2018	Phase 1	33.95	19,943.00		2,592.59	22,535.59	
8002257258	October 25, 2018	May 1 to May 31, 2018	Phase 1	103.25	61,940.50	4,062.57	8,580.40	74,583.47	
8002257260	October 25, 2018	June 1 to June 30, 2018	Phase 1	81.20	46,002.50		5,980.33	51,982.83	
8002269175	November 05, 2018	July 1 to July 31, 2018	Phase 1	20.10	10,782.50		1,401.73	12,184.23	
8002285218	November 16, 2018	August 1 to August 31, 2018	Phase 1	43.65	29,568.50		3,843.91	33,412.41	
8005045753	September 30, 2023	September 1 to December 31, 2018	Phase 1	144.50	95,695.50		12,440.42	108,135.92	
8005045759	September 30, 2023	January 1 to April 31, 2019	Phase 1	80.10	53,043.00		6,895.59	59,938.59	
8005045766	September 30, 2023	May 1 to July 31, 2019	Phase 1	63.30	42,085.50		5,471.12	47,556.62	
8005045778	September 30, 2023	August 1 to December 31, 2019	Phase 1	118.00	82,194.00		10,685.22	92,879.22	
8005045782	September 30, 2023	January 1 to April 30, 2020	Phase 1	82.90	51,419.50		6,684.54	58,104.04	
8005045787	September 30, 2023	May 1 to September 30, 2020	Phase 1	207.00	132,386.00		17,210.18	149,596.18	
8005081371	October 30, 2023	October 1, 2020 to September 30, 2021	Phase 1	269.90	178,172.00		23,162.36	201,334.36	
8005081428	October 30, 2023	October 1, 2021 to September 30, 2022	Phase 1	267.40	154,439.50		20,077.14	174,516.64	
8005081455	October 30, 2023	October 1, 2022 to September 30, 2023	Phase 1	230.40	161,136.00		20,947.68	182,083.68	
8005348623	April 3, 2024	October 1, 2023 to December 31, 2023	Phase 1	70.90	56,590.50		7,356.77	63,947.27	
8005423694	May 9, 2024	January 1, 2024 to March 31, 2024	Phase 1	170.10	127,353.50		16,555.96	143,909.46	
7000461956	June 20, 2024	April 1, 2024 to May 31, 2024	Phase 1	49.10	37,505.00		4,875.65	42,380.65	
8005569675	July 30, 2024	June 1, 2024 to June 30, 2024	Phase 1	55.00	46,098.00		5,992.74	52,090.74	
Phase 1 Total				3,131.90	2,066,986.50	45,716.39	274,651.42	2,387,354.31	
8002160893	August 07, 2018	February 1 to February 28, 2018	Phase 2	37.95	27,170.00		3532.1	30,702.10	
8002161038	August 07, 2018	March 1 to March 31, 2018	Phase 2	81.65	56,059.00	66.3	7296.29	63,421.59	
8002257257	October 25, 2018	April 1 to April 30, 2018	Phase 2	222.65	108,578.50	66.3	14123.82	122,768.62	
8002257259	October 25, 2018	May 1 to May 31, 2018	Phase 2	102.25	57,443.50		7467.66	64,911.16	
8002257261	October 25, 2018	June 1 to June 30, 2018	Phase 2	37.35	23,985.50		3118.12	27,103.62	
8002266902	November 01, 2018	July 1 to July 31, 2018	Phase 2	22.75	13,580.50		1765.47	15,345.97	
8002285219	November 16, 2018	August 1 to August 31, 2018	Phase 2	5.40	3,147.00		409.11	3,556.11	
8005081479	October 30, 2023	September 1 2018 to July 31, 2019	Phase 2	23.95	17,703.00		2301.39	20,004.39	
8005081503	October 30, 2023	August 1 to December 31, 2019	Phase 2	3.90	2,849.00		370.37	3,219.37	
Phase 2 Total				537.85	310,516.00	132.60	40,384.33	351,032.93	
Total				3,669.75	2,377,502.50	45,848.99	315,035.75	2,738,387.24	
Average Rate per Hour									\$ 647.86 / hour

Liquidator's
Additional
Fee Period

Appendix “D”

KPMG Inc., in its capacity as Liquidator									
Phase 1 Hourly Rate by Fiscal Year for the Professional Fee Review Period ⁽¹⁾									\$CAD
Name	Position	FY2017	FY2018	FY2019	FY2020	FY2021	FY2022	FY2023	FY2024 ⁽²⁾
Alison Brown	Manager				545.00				
Angelina Hung	Technician							290.00	355.00
Annette Chopowick	Technician			220.00	225.00	240.00	265.00	290.00	355.00
Asya Rzhovsky	Technician	205.00	204.50						
Chris Walker	Senior Manager		650.00		710.00				
Corey Fotheringham	Partner		835.00						
Danny Garwood	Senior Manager		650.00						
George Bourikas	Senior Manager		653.64	690.00	710.00	740.00	770.00	795.00	990.00
Hannah Rhee	Senior Consultant		350.00						
Jojo Tang	Senior Consultant				410.00				
Jorden Sleeth	Partner	735.00	735.00						
Katherine Forbes	Partner			885.00				995.00	
Lea Loutfi	Senior Consultant						430.00	475.00	
Mackenzie Wong	Senior Consultant								495.00
Manoj Oommen	Senior Consultant		350.00						
Nate Fenema	Senior Consultant		350.00						
Nerina Jahja	Senior Consultant		350.00						
Nick Brearton	Partner	835.00	839.17	885.00	910.00	945.00	980.00	995.00	1,055.00
Sven Dedic	Senior Consultant to Senior Manager	370.00	491.67	530.00	545.00	660.00	685.00	710.00	
Zack Burstein	Senior Consultant		350.00						

(1) KPMG Inc.'s fiscal year is from October 1 - September 30

(2) FY2024 represents October 1, 2023 - June 30, 2024

Appendix “E”

KPMG Inc., in its capacity as Liquidator
Summary of the Liquidator's Hours, Fee, and Disbursements by Fiscal Year, including Average Hourly Rate for Phase 1 ^{(1) (2)}
\$CAD

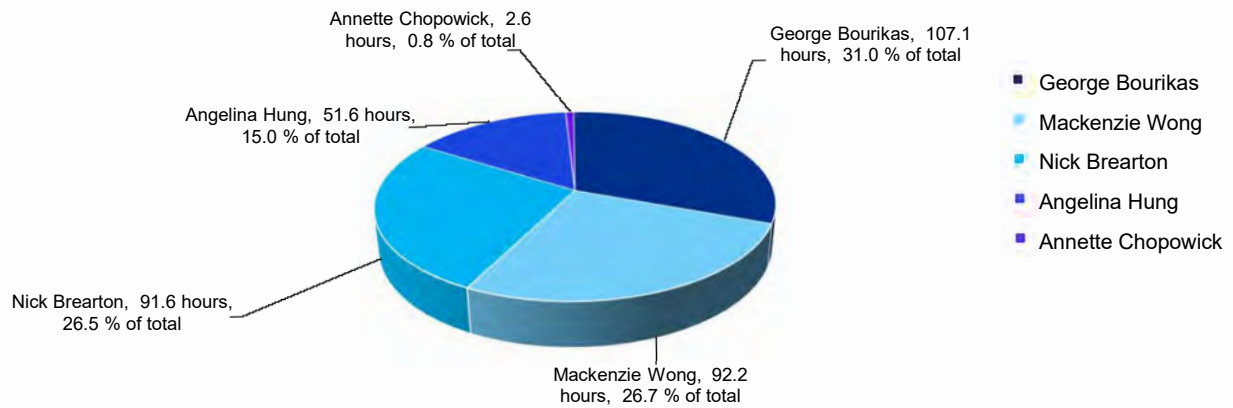
Year	FY2017	FY2018	FY2019	FY2020	FY2021	FY2022	FY2023	FY2024	Total
Period	Aug 1, 2017 - Sep 30, 2017	Oct 1, 2017 - Sep 30, 2018	Oct 1, 2018 - Sep 30, 2019	Oct 1, 2019 - Sep 30, 2020	Oct 1, 2020 - Sep 30, 2021	Oct 1, 2021 - Sep 30, 2022	Oct 1, 2022 - Sep 30, 2023	Oct 1, 2023 - Jun 30, 2024	Aug 1, 2017 - Jun 30, 2024
Hours	237.90 hours	1,118.75 hours	307.05 hours	355.40 hours	269.90 hours	267.40 hours	230.40 hours	345.10 hours	3,131.90 hours
Fees	\$ 160,423.50	\$ 708,561.00	\$ 206,236.50	\$ 230,471.00	\$ 178,172.00	\$ 154,439.50	\$ 161,136.00	\$ 267,547.00	\$ 2,066,986.50
Disbursements	\$ 17,215.34	\$ 28,501.05	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 45,716.39
Average Rate per Hour	\$ 674.33 / hour	\$ 633.35 / hour	\$ 671.67 / hour	\$ 648.48 / hour	\$ 660.14 / hour	\$ 577.56 / hour	\$ 699.38 / hour	\$ 775.27 / hour	\$ 659.98 / hour

(1) KPMG Inc.'s fiscal year is from October 1 - September 30

(2) Some invoices straddle two fiscal years and KPMG has allocated the hours, fees and disbursements to their respective fiscal year.

Appendix “F”

KPMG Hours and Work Distribution from Oct 1, 2023 to Jun 30, 2024



Appendix “G”

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

IN THE MATTER OF MAPLE BANK GmbH

AND IN THE MATTER OF THE *WINDING-UP AND RESTRUCTURING ACT*,
R.S.C. 1985, C.W-11, AS AMENDED

AND IN THE MATTER OF THE *BANK ACT*, S.C. 1991, C.46, AS AMENDED

BETWEEN:

ATTORNEY GENERAL OF CANADA

Applicant

- and -

MAPLE BANK GmbH

Respondent

**AFFIDAVIT OF NICHOLAS BREARTON
(Sworn August 22, 2024)**

I, NICHOLAS BREARTON, of the City of Toronto, in the Province of Ontario, **MAKE
OATH AND SAY AS FOLLOWS:**

1. I am a consultant to, and former president of, KPMG Inc. (“**KPMG**”) in its capacity as court-appointed liquidator (the “**Liquidator**”) of Maple Bank GmbH’s (“**Maple Bank**”) business

and assets in Canada (“**Toronto Branch**”), as of February 16, 2016, and as such have knowledge of the matters set out below.

2. This affidavit is made in support of a motion for, *inter alia*, the approval of the fees and disbursements of the Liquidator for the period January 1, 2024 to June 30, 2024 (the “**Liquidator’s Additional Fee Period**”). Attached hereto and marked as **Exhibit “A”** is a summary of the accounts of the Liquidator for the Liquidator’s Additional Fee Period, in the total amount of \$238,380.85.
3. Attached hereto and marked as **Exhibit “B”** are true copies of the accounts of the Liquidator for the Liquidator’s Additional Fee Period. A summary of the Liquidator’s accounts is provided below.

Hours	274.20 hours
Fees	\$ 210,956.50
Disbursements	\$0
HST	\$27,424.35
Total	\$238,380.85
Average Rate per Hour	\$769.35 / hour

4. The Liquidator's professional rates are comparable to the rates charged by other professional services firms in Toronto providing similar services.
5. I swear this affidavit in support of this motion for approval of the Liquidator's fees and disbursements and for no improper purpose.

SWORN BEFORE ME over video)
teleconference this 22nd day of August,)
2024, in accordance with Ontario)
Regulation 431/20. The affiant was)
located in Toronto, Ontario, while the)
commissioner, Annette Chopowick, was)
located in Whitby, Ontario.)

A. Chapowick

A Commissioner for Taking Affidavits

Annette Chopowick, a
Commissioner, etc. Province of
Ontario, for KPMG Inc.
Expires August 3, 2027

1 Breast

Nicholas Brearton

Exhibit A

This is the Exhibit marked "A" referred to in the
Affidavit of Nicholas Brearton,
sworn before me this 22nd day of August, 2024

A handwritten signature in black ink, reading "A. Chopowick". The signature is written in a cursive style with a large, looped "A" and a long, sweeping underline that extends to the right.

A Commissioner for Taking Affidavits

Annette Chopowick, a
Commissioner, etc. Province of
Ontario, for KPMG Inc.
Expires August 3, 2027

Professional Fees for the Period from January 1, 2024 to June 30, 2024

Invoice Number	Invoice Date	Period	Phase	Hours	Professional Fees	Disbursements	HST	Total
8005423694	May 9, 2024	January 1, 2024 to March 31, 2024	Phase 1	170.10	127,353.50		16,555.96	143,909.46
7000461956	June 20, 2024	April 1, 2024 to May 31, 2024	Phase 1	49.10	37,505.00		4,875.65	42,380.65
8005569675	July 30, 2024	June 1, 2024 to June 30, 2024	Phase 1	55.00	46,098.00		5,992.74	52,090.74
Total				274.20	210,956.50	-	27,424.35	238,380.85

\$ 769.35 / hour

Exhibit B

This is the Exhibit marked "B" referred to in the
Affidavit of Nicholas Brearton,
sworn before me this 22nd day of August, 2024

A handwritten signature in black ink, reading "A. Chopowick". The signature is written in a cursive style with a large, looped "A" and a stylized "Chopowick".

A Commissioner for Taking Affidavits

Annette Chopowick, a
Commissioner, etc. Province of
Ontario, for KPMG Inc.
Expires August 3, 2027



KPMG Inc.
Suite 4600 Bay Adelaide Centre
333 Bay Street
Toronto, ON M5H 2S5

Payment Address:
KPMG LLP, T4348
P.O. Box 4348, Station A
Toronto, ON M5W 7A6

May 9, 2024

Office of the Superintendent of
Financial Institutions Canada
121 King Street West
Toronto, ON M5H 3T9

Invoice : 8005423694
Reference : 2000496507
Client : 1000029297
Contact : Anamika Gadia
Telephone : (416) 777-3842
Email : agadia@kpmg.ca

Fees for the period of January 1, 2024 to March 31, 2024, for the services provided by KPMG Inc. In its role as Liquidator of the Toronto Branch of Maple Bank GmbH, in accordance with the Court order issued on February 16, 2016 under the Winding-Up and Restructuring Act.

Our Fee \$ 127,353.50 CAD

\$ 127,353.50 CAD

HST 16,555.96

Amount Due \$ 143,909.46 CAD

Payment is due upon receipt

GST/HST Number 12236 3153 RT0001 QST Registration 1023774310 TQ0001

CAD Cheque Payments: KPMG LLP, T4348, P.O. Box 4348, Station A, Toronto, ON M5W 7A6
Please return remittance advice with cheque.

CAD Wire Payments: Beneficiary: KPMG LLP
Bank Details: TD Canada Trust, 55 King St. West, Toronto, ON M5K 1A2, Bank Code # 004, Transit # 10252,
Account # 0938281, Swift Code TDOMCATTOR
Please e-mail related wire payment details including invoice number to kpmg-ar@kpmg.ca

Invoice No: 8005423694 **Reference:** 2000496507 **Client:** 1000029297 **Amount:** \$ 143,909.46 CAD

Maple Financial Liquidation
Time Details
January 1 2024 to March 31,2024

Name	Position	Rate	Hours	Fees (\$)
Nick Brearton	Partner	\$ 1,055.00	45.7	\$ 48,213.50
George Bourikas	Sr. Manager	\$ 990.00	40.4	\$ 39,996.00
Mackenzie Wong	Sr. Consultant	\$ 495.00	66.6	\$ 32,967.00
Angelina Hung	Technician	\$ 355.00	16.5	\$ 5,857.50
Annette Chopowick	Technician	\$ 355.00	0.9	\$ 319.50
Total			170.1	\$ 127,353.50
HST				\$ 16,555.96
Total Amount due				\$ 143,909.46

**Maple Financial Liquidation
Time Details
January 1 2024 to March 31,2024**

Employee Name	Date	Time Narrative	Hours	Rate	Fees (\$)
<u>Nick Brearton - Partner</u>					
Nick Brearton	01/07/2024	Review of BLG billing and email to G. Bourikas signing off on.	0.10	\$1,055.00	\$105.50
Nick Brearton	01/08/2024	Approval of various invoices for payment.	0.10	\$1,055.00	\$105.50
Nick Brearton	01/16/2024	Discussion with M. Wong and G. Bourikas re: fee affidavit and issues associated with its preparation.	0.60	\$1,055.00	\$633.00
Nick Brearton	01/17/2024	Review of letter from the German Insolvency Administrator ("GIA") re: info required for their next creditor committee meeting. Email to BLG re: the GIA's requested revision to order, status of Final Data Transfer Order and MFGI stakeholder letter. Review of D. Michaluk's and A. MacFarlane's email responses and respond to D. Michaluk. Discussion with M. Wong re: file background, GIA info request and timeline / cash analysis to be prepared.	1.40	\$1,055.00	\$1,477.00
Nick Brearton	01/18/2024	Review of CRA calculations re: refund owing. Email to EY seeking their comments on the calculations. Review of i) cash available for distribution calculation and step chart to complete file. Email to M. Wong on investment fair market value change. Discussions with M. Wong re: revisions to cash available for distribution calculations / step chart.	2.40	\$1,055.00	\$2,532.00
Nick Brearton	01/22/2024	Draft response to the GIA's letter dated Jan 17, 2024. Subsequent emails to M. Wong, and thereafter BLG seeking their input on draft email.	1.00	\$1,055.00	\$1,055.00
Nick Brearton	01/23/2024	Emails to/from BLG regarding revision to Final Data Transfer order. Revision to order and email to GIA to reflect order revision.	0.30	\$1,055.00	\$316.50
Nick Brearton	01/25/2024	Start review of fee affidavit including 13th, 13th Supplement and 14th Court Reports re: issues addressed for inclusion in fee affidavit's summary of activities.	1.30	\$1,055.00	\$1,371.50
Nick Brearton	01/26/2024	Prep for call with GIA. Call with GIA, A. MacFarlane and M. Wong re: update on file, discussion on Final Data Transfer Order and related MFGI stakeholder letter. Discussion with M. Wong re: next steps.	1.10	\$1,055.00	\$1,160.50
Nick Brearton	01/29/2024	Review of GIA's comments on Final Data Transfer Order and MFGI stakeholder letter. Tracing data through Data Transfer Order and Data Custodian Order to resolve GIA query on data being transferred through final order. Partial review and revisions to draft fee Affidavit.	3.30	\$1,055.00	\$3,481.50
Nick Brearton	01/30/2024	Call with BLG (D. Michaluk and A. MacFarlane), G. Bourikas and M. Wong to discuss GIA's comments in its Jan 29th email on Final Data Transfer Order and MFGI stakeholder letter. Subsequent notes of next steps. Complete review of draft Fee Affidavit and related exhibits, including a review of the ICC's Second Report to determine schedules and financial info included in it. Call with G. Bourikas and M. Wong to discuss physical records to be transferred to the GIA, including personal records, fee affidavit structure and revisions to appendices for both content and order. Notes of next steps in fee affidavit preparation.	4.60	\$1,055.00	\$4,853.00
Nick Brearton	01/31/2024	Review of revisions to Final Data Transfer Order in response to GIA comments. Subsequent discussion with G. Bourikas re: changing approach on MFGI. Teams call with M. Wong to work through revisions to the Final Data Transfer Order, MFGI stakeholder letter and cover email to BLG.	0.90	\$1,055.00	\$949.50
Nick Brearton	02/01/2024	Review and revise Oct 1 to Dec 31, 2023 invoice. Billing rate summary email to N. Kanda.	2.50	\$1,055.00	\$2,637.50
Nick Brearton	02/02/2024	Discussion with M. Wong re: questions on fee affidavit revisions. Determination of billing rates for Oct 1 to Dec 31, 2023 bill.	0.90	\$1,055.00	\$949.50
Nick Brearton	02/05/2024	Review of updated fee affidavit including appendices. Discussion with M. Wong re: questions on affidavit comments.	2.20	\$1,055.00	\$2,321.00
Nick Brearton	02/06/2024	Review of EY's (E. Coddington) comments on CRA refund calculations. Review and revise updated Oct 1 to Dec 31, 2023 invoice. Internal emails re: queries on time entries. Call with M. Wong and G. Bourikas re: fee affidavit status, EY's comments on CRA refund calculations and email to be sent to EY, follow-up with BLG on Final Data Transfer Order comments to GIA. Email to EY re: next steps on analyzing CRA calculations.	1.70	\$1,055.00	\$1,793.50
Nick Brearton	02/07/2024	Review of D. Michaluk's changes to Final Data Transfer Order comments. Review of G. Bourikas's comments on fee affidavit. Review of revisions to Oct 1 to Dec 31, 2023 invoice. Email to M. Wong re: finalizing fee affidavit. Discussion with M. Wong re: fee affidavit comments, email to GIA with Order and MFGI stakeholder letter.	0.80	\$1,055.00	\$844.00
Nick Brearton	02/20/2024	Review of GIA email dated Feb 20th and their proposed revisions to Final Data Transfer Order and MFGI stakeholder letter.	0.10	\$1,055.00	\$105.50
Nick Brearton	02/21/2024	Detailed review of EY CRA refund analysis per Feb 5th and Feb 16th emails. Discussion with G. Bourikas and M. Wong re: fee affidavit issues and call with BLG, recent GIA email, upcoming call with EY on CRA refund calculations and issues to discuss. Discussion with EY (E. Coddington), G. Bourikas and M. Wong re: CRA's refund calculations vs. EY's. Discussion with G. Bourikas re: call with EY and next steps. Discussion with M. Wong re: fee affidavit.	3.40	\$1,055.00	\$3,587.00
Nick Brearton	02/22/2024	Review of emails re: invoices already reviewed by A. Ilchenko and prior ICC. Review of Jan 2018 invoices (Phase 1 & 2) for inclusion in fee affidavit. Teams working call with M. Wong re: developing responses to the GIA's comments on Final Data Transfer Order and MFGI stakeholder letter.	1.30	\$1,055.00	\$1,371.50
Nick Brearton	02/23/2024	Prepare questions for BLG re: fee affidavit. Conference call with BLG (A. MacFarlane, N. Hollard and A. Gasparini) and M. Wong re: fee affidavit including need to integrate into a Liquidator Report. Subsequent discussion with M. Wong re: Liquidator Fee Report format. Review of BLG fee affidavit. Discussion with A. MacFarlane re: queries on BLG affidavit. Discussion with M. Wong re: revisions needed to BLG affidavit.	1.10	\$1,055.00	\$1,160.50
Nick Brearton	02/25/2024	Review and revise draft Sixteenth Court report on Liquidator's and BLG's fees to be taxed. Subsequent review of revised affidavit.	4.00	\$1,055.00	\$4,220.00
Nick Brearton	02/26/2024	Review and revise updated draft Sixteenth Court Report and fee affidavit. Discussion with M. Wong re: questions on report and affidavit. Review of G. Bourikas's comments on the draft report and email to G. Bourikas and M. Wong on report revisions / BLG email. Discussion with M. Wong and G. Bourikas re: fee affidavit and Sixteenth Court report. Discussion with BLG (A. MacFarlane, N. Holland), G. Bourikas and M. Wong re: Sixteenth Court report and related fee affidavit.	2.60	\$1,055.00	\$2,743.00
Nick Brearton	02/27/2024	Review of L. Lai's email on the tax remittance quantum issue. Email to M. Wong re: implication of email, forwarding to EY. Review of various emails associated with expense details and redacting of invoices, and respond as necessary. Review of various emails on changes to Final Data Transfer Order in light of GIA's Feb 20th email. Discussion with M. Wong re: changes to Final Data Transfer Order and MFGI stakeholder letter. Teams call with BLG (A. Gasparini) to execute KPMG fee affidavit.	1.30	\$1,055.00	\$1,371.50
Nick Brearton	02/28/2024	Discussion with G. Bourikas and M. Wong re: finalizing Sixteenth Court Report, next steps on GIA comments on Final Data Transfer Order and MFGI stakeholder letter.	0.20	\$1,055.00	\$211.00
Nick Brearton	03/01/2024	Review of various emails re: revisions by BLG to Final Data Transfer Order and MFGI stakeholder letter. Discussion with G. Bourikas re: file status.	0.40	\$1,055.00	\$422.00
Nick Brearton	03/04/2024	Review of email from Court re: Court hearing date and information requested by Assoc Justice I. Ilchenko. Email to G. Bourikas and M. Wong on same.	0.20	\$1,055.00	\$211.00
Nick Brearton	03/05/2024	Review of draft average rate table requested by Assoc Justice A. Ilchenko and email comments to M. Wong and G. Bourikas.	0.20	\$1,055.00	\$211.00
Nick Brearton	03/06/2024	Review and approve various invoices for payment. Review of GIA's latest request for revisions to Final Data Transfer Order and email G. Bourikas on same, including review of earlier GIA change request on contracts language.	0.20	\$1,055.00	\$211.00

Nick Brearton	03/07/2024	Discussion with G. Bourikas re: Final Data Transfer Order and recipients of MFGI stakeholder letter, including shareholders and directors of MFGI. Subsequent review of draft email on same to BLG. Review and revise draft CRA letter providing comments on CRA refund calculations.	2.10	\$1,055.00	\$2,215.50
Nick Brearton	03/08/2024	Discussion with G. Bourikas re: file status.	0.20	\$1,055.00	\$211.00
Nick Brearton	03/11/2024	Various emails to/from BLG re: searching for MFGI directors.	0.10	\$1,055.00	\$105.50
Nick Brearton	03/12/2024	Discussion with A. Chopowick re: Trust report for CRA and file background for completing form. Review and revise draft CRA letter re: refund differences. Discussion with G. Bourikas re: determining MFGI director contact info, invoicing.	0.40	\$1,055.00	\$422.00
Nick Brearton	03/18/2024	Review of GIA's response to MFGI director query. Review of G. Bourikas's email re: notice of Final Data Transfer Order and subsequent discussion with G. Bourikas re: same and file update.	0.20	\$1,055.00	\$211.00
Nick Brearton	03/20/2024	Review of BLG fee invoice.	0.10	\$1,055.00	\$105.50
Nick Brearton	03/22/2024	Review of CRA's NOA dated March 11th. Review of EY's (E. Coddington) comments on draft letter to CRA on their refund calculations. Email to E. Coddington on NOA, including whether to reference in CRA letter / appeal NOA.	0.60	\$1,055.00	\$633.00
Nick Brearton	03/25/2024	Discussion with G. Bourikas re: finalizing letter to CRA given E. Finley's comments. Review of various emails re: GIA meeting request and coordinating a new call.	0.50	\$1,055.00	\$527.50
Nick Brearton	03/26/2024	Review of emails with BLG re: data transfer letters issued. Compare to instruction email and follow-up with BLG.	0.10	\$1,055.00	\$105.50
Nick Brearton	03/27/2024	Prep for upcoming call with GIA. Discussion with G. Bourikas re: status of file, upcoming GIA call. Call with GIA re: CRA, Final Data Transfer Order, next steps and timing. Subsequent call with G. Bourikas re: GIA call and next steps	0.70	\$1,055.00	\$738.50
Nick Brearton	03/28/2024	Review of Oct 1 to Dec 31, 2023 billing. Discussion with G. Bourikas re: invoice email to GIA on L. Lai's hours, email to EY.	0.50	\$1,055.00	\$527.50
Total For Nick Brearton			45.70		\$48,213.50

George Bourikas - Sr. Manager

George Bourikas	01/02/2024	Review K. Campbell invoice for December 2023 IT monitoring services and coordinate payment of same.	0.20	\$990	\$198.00
George Bourikas	01/03/2024	Review Cloud Iland invoice for Jan 2024 IT storage services and coordinate payment of same.	0.20	\$990	\$198.00
George Bourikas	01/08/2024	Review L. Lai invoice for December 2023 and coordinate payment of same; Review BLG invoice for December 2023 fees and coordinate payment of same; Correspondence with Cloud Iland re: contract extension; Review renewal contract and email to K. Campbell re: same.	0.70	\$990	\$693.00
George Bourikas	01/09/2024	Correspondence re: Cloud Iland contract extension; Review final contract and execute same; Review correspondence re: Final Data Transfer Order; Review RecordXPress invoice.	0.60	\$990	\$594.00
George Bourikas	01/10/2024	Review RecordsXPress invoice for 2024 document storage; Review terms of Court order; Email to A. Hung re: same; Coordinate payment of same.	0.40	\$990	\$396.00
George Bourikas	01/11/2024	Correspondence re: RecordsXpress payment.	0.10	\$990	\$99.00
George Bourikas	01/12/2024	Email to BLG (N. Miklaucic) re: CRA reassessments	0.10	\$990	\$99.00
George Bourikas	01/15/2024	Call with M. Wong re: fee affidavit.	0.30	\$990	\$297.00
George Bourikas	01/16/2024	Meeting with M. Wong re: fee affidavit and tables; Call with N. Brearton and M. Wong re: same; Reply to request for audit support from L. Lai.	1.70	\$990	\$1,683.00
George Bourikas	01/17/2024	Review GIA request letter; Emails to A. Hung, M. Wong, N. Brearton re: same.	0.40	\$990	\$396.00
George Bourikas	01/22/2024	Review BLG (D. Michaluk) revisions to Final Data Transfer Order; Review draft reply email to GIA inquiries.	0.40	\$990	\$396.00
George Bourikas	01/24/2024	Review 2023 HST return and T2 and related correspondence.	0.30	\$990	\$297.00
George Bourikas	01/29/2024	Review EY invoice for tax work and coordinate payment of same; Email exchange with A. Hung re: banking matters; File update call with M. Wong re: CRA status, Final Data Transfer Order, fee affidavits, step plan to competition; Email correspondence with L. Lai re: T2 and HST returns.	0.70	\$990	\$693.00
George Bourikas	01/30/2024	Call with A. MacFarlane, D. Michaluk, N. Brearton, M. Wong re: GIA comments on draft Final Data Transfer Order; Review Data Transfer Order and Data Custodian Order and email to working group re: particulars of data to be transferred; Call with N. Brearton and M. Wong re: Final Data Transfer Order, fee affidavit revisions, other file matters; Discussion with M. Wong re: physical records; Review revisions to Final Data Transfer Order and circulate to N. Brearton for comment.	3.30	\$990	\$3,267.00
George Bourikas	01/31/2024	Various email correspondence re: MBTOR physical records storage; Review draft MFGI stakeholder letter and provide comments on same; Call with N. Brearton on same.	0.80	\$990	\$792.00
George Bourikas	02/01/2024	Review various email correspondence re: Final Data Transfer Order.	0.20	\$990	\$198.00
George Bourikas	02/02/2024	Review correspondence re: Final Data Transfer Order.	0.10	\$990	\$99.00
George Bourikas	02/05/2024	Review Cloud Iland invoice for Feb 2024 IT services and coordinate payment of same; Email exchange with K. Campbell re: file status; Review K. Campbell invoice for January 2024 IT monitoring services and coordinate payment of same; Call with M. Wong re: fee affidavit; Review and execute T2 return for year ended November 30, 2023; Review 2023 HST filing confirmation; Review email from the GIA (J. Kuhnere) re: data storage requirements post-discharge.	1.10	\$990	\$1,089.00
George Bourikas	02/06/2024	Email correspondence with M. Wong re: books and records storage; Review L. Lai invoice for January 2024 accounting services and coordinate payment of same; Detailed review of EY (E. Coddington) email re: CRA calculations on tax appeal and interest; Call with N. Brearton and M. Wong re: fee affidavit, CRA interest calculations; Subsequent discussion with M. Wong re: same.	1.40	\$990	\$1,386.00
George Bourikas	02/07/2024	Review comments on Final Data Transfer Order; Review draft Fee Affidavit and provide comments on same.	0.60	\$990	\$594.00
George Bourikas	02/20/2024	Review BLG invoice for legal fees for period ended January 31, 2024 and coordinate payment of same; Review updated draft MFGI stakeholder letter; Review various correspondence with GIA; Review correspondence from EY (E. Coddington) re: CRA interest calculations; Discussions with M. Wong re: invoice redactions for fee affidavit support and email to N. Brearton re: same; Review audit support request email from L. Lai.	1.40	\$990	\$1,386.00
George Bourikas	02/21/2024	Review EY (E. Coddington) email re: CRA refund calculation discrepancies; Call with N. Brearton and M. Wong re: CRA refund calculations, GIA comments on Final Data Transfer Order and MFGI stakeholder letter; Call with EY (E. Coddington), N. Brearton and M. Wong re: EY and CRA interest calculations. Subsequent debrief with M. Wong re: same; Review call notes; Discussion with N. Brearton re: draft email to CRA regarding calculation corrections.	2.60	\$990	\$2,574.00
George Bourikas	02/26/2024	Review correspondence re: fee affidavit and Court report; Review documents assembled for L. Lai's response to German financial statement audit request; Review correspondence re: EY review of CRA interest calculations; Email to M. Wong re: updates to creditors website; Review revised draft MFGI stakeholder letter, review data orders and files, and email to N. Brearton re: addition of former MSCL subtenant information; Email to G. Wega re: Maple Bank auditor request; Email to L. Lai re: response to same; Review draft Sixteenth Report of the Liquidator and provide comments to N. Brearton and M. Wong; Review draft Brearton Fee Affidavit; Call with N. Brearton and M. Wong re: Sixteenth Report and related Fee Affidavit, Final Data Transfer Order and draft MFGI stakeholder letter; Call with BLG and KPMG re: Sixteenth Report and Fee Affidavit; Provide final comments to N. Brearton on Final Data Transfer Order.	3.80	\$990	\$3,762.00

George Bourikas	02/27/2024	Correspondence with the GIA (O. Scheffen) re: Iron Mountain invoice; Internal correspondence re: same; Review correspondence re: Final Data Transfer Order and KPMG Fee Affidavit comments; Review BLG comments on Sixteenth Report of the Liquidator and call with M. Wong to revise report for same.	1.20	\$990	\$1,188.00
George Bourikas	02/28/2024	Call with N. Brearton and M. Wong re: Sixteenth Report, next steps with GIA; Revisions to Sixteenth Report; Discussion with M. Wong re: additional comments on Sixteenth Report; Provide updated report to BLG; Review and finalize appendices to report; Coordinate filing with Assoc Justice Ilchenko; Review BLG comments on draft MFGI stakeholder letter and correspondence with BLG on same; Update file to do list.	2.30	\$990	\$2,277.00
George Bourikas	02/29/2024	Review the GIA's (J. Kuhne) email re: Final Data Transfer Order, MFGI stakeholder letter, CRA calculations review; Discussion with M. Wong re: same; Email to BLG team re: draft order and MFGI stakeholder letter.	0.50	\$990	\$495.00
George Bourikas	03/01/2024	Review of updated Final Data Transfer Order and MFGI Stakeholder Letter; Call with M. Wong re: same; Reply to GIA email re: same and status of CRA calculations review; File update call with N. Brearton.	1.20	\$990	\$1,188.00
George Bourikas	03/04/2024	Review K. Campbell invoice for February 2024 IT monitoring and coordinate payment of same; Review Cloud iland invoice for March 2024 IT server fees and coordinate payment of same; Review service renewal contract for same; Review correspondence re: fee affidavit; Review and revise draft letter to CRA re: tax refund calculation discrepancies; Call with M. Wong re: same.	2.80	\$990	\$2,772.00
George Bourikas	03/05/2024	Review L. Lai invoice for February 2024 and coordinate payment of same; Review GIA's (J. Kuhne) revisions to Final Data Transfer Order and email to N. Brearton re: same; Review updated appendix to Fee Affidavit; Review email from N. Brearton on same; Email to team re: comments on same.	0.90	\$990	\$891.00
George Bourikas	03/06/2024	Correspondence re: Final Data Transfer Order; Coordinate payment of security for HST to CRA.	0.40	\$990	\$396.00
George Bourikas	03/07/2024	Call with N. Brearton re: Final Data Transfer Order and service matters including recipients of MFGI stakeholder letter; Draft emails to BLG re: same; Coordinate payment of HST security to CRA; Various correspondence re: service matters; Draft email to Deloitte (J. Sleeth) re: MFGI directors list and contact information.	1.30	\$990	\$1,287.00
George Bourikas	03/08/2024	Call with N. Brearton re: various file matters; Email to Deloitte (J. Sleeth) re: records transfer to GIA and MFGI former directors; Email to GIA re: Final Data Transfer Order.	0.80	\$990	\$792.00
George Bourikas	03/11/2024	Review N. Brearton revisions and comments on draft letter to CRA re: settlement calculations; Revisions to same; Email to N. Brearton re: same.	0.80	\$990	\$792.00
George Bourikas	03/12/2024	Call with N. Brearton re: draft CRA letter, letter to MFGI stakeholders and including shareholders and directors, invoicing; Revisions to draft CRA letter and email to EY (E. Coddington) re: same; Email to M. Wong re: MFGI directors search; Email to GIA re: former MFGI directors.	1.40	\$990	\$1,386.00
George Bourikas	03/13/2024	Correspondence with G. Wega re: reinvestment of estate funds.	0.10	\$990	\$99.00
George Bourikas	03/15/2024	Correspondence re: MFGI directors and email to N. Brearton re: same.	0.20	\$990	\$198.00
George Bourikas	03/18/2024	Call with N. Brearton re: CRA tax letter; MFGI stakeholder letter; Email to BLG team re: delivery of same; Review monthly RBC investment portfolio statement and correspondence with A. Chopowick re: same.	0.70	\$990	\$693.00
George Bourikas	03/20/2024	Review Notice of Assessment regarding T2 for tax year ended November 30, 2023; Emails to N. Brearton and EY (E. Coddington) re: same; Review BLG invoice for the period ended February 29, 2024 and coordinate payment of same.	0.50	\$990	\$495.00
George Bourikas	03/25/2024	Review EY (E. Coddington) comments on draft letter to CRA; Revisions to same; Call with N. Brearton re: CRA letter; Email to BLG (N. Miklaucic) re: same; Correspondence with BLG (A. MacFarlane); Correspondence with GIA.	1.80	\$990	\$1,782.00
George Bourikas	03/26/2024	Correspondence with N. Brearton and BLG (A. Gasparini) re: MFGI stakeholder letter service; Billing matters.	0.60	\$990	\$594.00
George Bourikas	03/27/2024	Pre-call with N. Brearton; Call with GIA re: CRA status, Data Transfer, next steps; Email to A. Hung re: L. Lai invoices; Subsequent debrief call with N. Brearton.	0.90	\$990	\$891.00
George Bourikas	03/28/2024	Analysis of L. Lai's billings; Email to GIA re: same; Call with N. Brearton re: file update and billing matters; Email to EY (E. Coddington) re: CRA status.	0.60	\$990	\$594.00
Total For George Bourikas			40.40		\$39,996.00

Mackenzie Wong - Sr. Consultant

Mackenzie Wong	01/10/2024	Draft fee affidavit.	0.50	\$495	\$247.50
Mackenzie Wong	01/11/2024	Draft fee affidavit and exhibits.	0.80	\$495	\$396.00
Mackenzie Wong	01/15/2024	Revisions to the Fee Affidavit; call with G. Bourikas re: fee affidavit.	1.60	\$495	\$792.00
Mackenzie Wong	01/16/2024	Discussion with G. Bourikas re: fee affidavit and tables; internal discussion with G. Bourikas and N. Brearton re: same; analyzing invoices; revisions to the fee affidavit; preparation of exhibits for the fee affidavit.	5.30	\$495	\$2,623.50
Mackenzie Wong	01/17/2024	Revising fee affidavit; call with N. Brearton regarding creditor committee meeting; drafting step plan and cash position.	2.70	\$495	\$1,336.50
Mackenzie Wong	01/18/2024	Correspondence to N. Brearton regarding step plan and cash position; Subsequent discussion with N. Brearton on revisions to same.	1.90	\$495	\$940.50
Mackenzie Wong	01/19/2024	Drafting the Fee Affidavit; updating relevant exhibits; correspondence to N. Brearton re: same; call with CRA to get Web Access Code;; review of T2 Corporate Income Tax Return and HST return.	5.50	\$495	\$2,722.50
Mackenzie Wong	01/22/2024	Review draft correspondence to GIA and provide comments on it to N. Brearton.	0.30	\$495	\$148.50
Mackenzie Wong	01/24/2024	Reviewing HST/GST comments from L. Lai.	0.20	\$495	\$99.00
Mackenzie Wong	01/25/2024	Correspondence to L. Lai. re tax return.	0.10	\$495	\$49.50
Mackenzie Wong	01/26/2024	Call with GIA, A. MacFarlane and N. Brearton regarding Final Data Transfer Order and next steps; debrief with N. Brearton re: GIA call.	1.00	\$495	\$495.00
Mackenzie Wong	01/29/2024	Internal discussion with G. Bourikas on file status.	0.30	\$495	\$148.50
Mackenzie Wong	01/30/2024	Call with BLG (A. MacFarlane, D. Michaluk), N. Brearton, G. Bourikas re: Final Data Transfer Order; Discussion with N. Brearton and G. Bourikas re: physical records associated with Final Data Transfer Order, revisions to fee affidavit. Discussion with G. Bourikas re: physical records being stored.	4.00	\$495	\$1,980.00
Mackenzie Wong	01/31/2024	Revisions to the Fee Affidavit and related exhibits; internal call with N. Brearton regarding revisions on Final Data Transfer Order and MFGI stakeholder letter.	4.50	\$495	\$2,227.50
Mackenzie Wong	02/01/2024	Revisions to the Fee Affidavit and related exhibits; preparing document listing for storage records and searching for storage records.	5.20	\$495	\$2,574.00
Mackenzie Wong	02/02/2024	Internal call with N. Brearton regarding revisions to fee affidavit; subsequent updates to fee affidavit and related exhibits.	2.50	\$495	\$1,237.50
Mackenzie Wong	02/05/2024	Revisions to fee affidavit; internal discussion with N. Brearton; correspondence re: same; call with G. Bourikas re: fee affidavit.	1.70	\$495	\$841.50
Mackenzie Wong	02/06/2024	Locating and identifying boxes for storage; internal discussion with N. Brearton and G. Bourikas regarding tax issues and fee affidavit. Subsequent discussion with G. Bourikas re: same.	1.50	\$495	\$742.50
Mackenzie Wong	02/07/2024	Blackline Final Data Transfer Order; revise fee affidavit and related exhibits for internal comments; internal discussion with N. Brearton re: same.	2.00	\$495	\$990.00
Mackenzie Wong	02/08/2024	Correspondence to the GIA regarding Final Data Transfer Order and updates on CRA review; correspondence to BLG regarding Fee Affidavit; Identifying and preparing storage boxes ready for pickup from storage facilities.	1.50	\$495	\$742.50

Mackenzie Wong	02/09/2024	Correspondence with L Lai regarding activities of the Liquidator.	0.20	\$495	\$99.00
Mackenzie Wong	02/16/2024	Review of invoice narratives for confidential information.	0.50	\$495	\$247.50
Mackenzie Wong	02/20/2024	Review of external comments re: draft MFGI stakeholder letter and Final Data Transfer Order. Discussion with G. Bourikas re: invoice redactions for fee affidavit support.	0.20	\$495	\$99.00
Mackenzie Wong	02/21/2024	Internal call with G. Bourikas and N. Brearton to discuss CRA items, Final Data Transfer Order and MFGI stakeholder letter; call with EY (E. Coddington), G. Bourikas and N. Brearton to discuss CRA calculations and additional steps to resolution; blackline GIA changes re: Final Data Transfer Order and MFGI stakeholder letter; correspondence to L. Lai for tax items; internal discussion with N. Brearton re: fee affidavit. Subsequent debrief call with G. Bourikas on CRA letter.	2.80	\$495	\$1,386.00
Mackenzie Wong	02/22/2024	Beginning draft of CRA letter to detail tax issues and calculations; call with N. Brearton to discuss and update comments on Final Data Transfer Order and MFGI stakeholder letter; internal correspondence to determine Maple Bank data site/processing costs; internal correspondence to locate audit documents for L. Lai.	2.30	\$495	\$1,138.50
Mackenzie Wong	02/23/2024	Call with N. Brearton and BLG (N Holland, A. MacFarlane and A. Gasparini) to discuss fee affidavit and need for a Sixteenth Report of the Liquidator; discussion with N. Brearton re: fee affidavit format; draft Sixteenth Report of the Liquidator and related appendices; finding list of invoices requested by the GIA in preparation of upcoming audit; correspondence to L. Lai re same. Discussion with N. Brearton re: revisions needed to BLG affidavit.	4.80	\$495	\$2,376.00
Mackenzie Wong	02/24/2024	Draft Sixteenth Report of the Liquidator and related revisions to fee affidavit; internal correspondence re: same.	2.00	\$495	\$990.00
Mackenzie Wong	02/25/2024	Revisions to the Sixteenth report.	1.70	\$495	\$841.50
Mackenzie Wong	02/26/2024	Revise letter to the CRA for Maple Bank taxation issues; updates to the Liquidator's website; internal correspondence to determine disbursement details associated with invoices; internal call with G. Bourikas and N. Brearton to discuss fee affidavit. the Sixteenth report, draft order; internal call with N. Brearton to discuss revisions to the Sixteenth report; Email to BLG providing Sixteenth Report and KPMG fee affidavit; Call with BLG (A. Macfarlane, N. Holland), N. Brearton and G. Bourikas to discuss Sixteenth report.	3.60	\$495	\$1,782.00
Mackenzie Wong	02/27/2024	Correspondence and follow-up with EY on tax issues; correspondence to BLG on fee affidavit and court report; internal correspondence to discuss disbursements; call with N. Brearton to discuss revisions to Final Data Transfer Order and MFGI stakeholder letter; correspondence re: same; update to fee affidavit for BLG; correspondence re: same; call with G. Bourikas to revise Court report after updates from BLG.	1.90	\$495	\$940.50
Mackenzie Wong	02/28/2024	Call with N. Brearton and G. Bourikas to revise the Sixteenth Report, Final Data Transfer Order, MFGI stakeholder letter; discussion with G. Bourikas on additional comments to the Sixteenth Report; correspondence to BLG re: same.	1.00	\$495	\$495.00
Mackenzie Wong	02/29/2024	Discussion with G. Bourikas re: CRA draft letter.	0.80	\$495	\$396.00
Mackenzie Wong	03/01/2024	Call with G. Bourikas regarding Final Data Transfer Order and MFGI stakeholder letter.	0.10	\$495	\$49.50
Mackenzie Wong	03/04/2024	Compiling summary of hourly rates for Professional during the Fee Period; correspondence re: same; call with G. Bourikas regarding draft letter to CRA.	0.90	\$495	\$445.50
Mackenzie Wong	03/05/2024	Preparation of additional appendix requested by the Court; revisions to the appendix; correspondence re: same.	0.50	\$495	\$247.50
Mackenzie Wong	03/12/2024	Research Directors of MFGI and determine appropriate shareholders to receive the shareholder letter.	0.20	\$495	\$99.00
Total For Mackenzie Wong			66.60		\$32,967.00

Angelina Hung - Technician

Angelina Hung	01/03/2024	Attend to banking matter.	0.50	\$355	\$177.50
Angelina Hung	01/09/2024	Attend to banking matter.	0.60	\$355	\$213.00
Angelina Hung	01/10/2024	Attend to banking matter.	0.30	\$355	\$106.50
Angelina Hung	01/11/2024	Attend to banking matter.	1.10	\$355	\$390.50
Angelina Hung	01/12/2024	Attend to banking matter.	0.40	\$355	\$142.00
Angelina Hung	01/16/2024	Attend to banking matter.	0.20	\$355	\$71.00
Angelina Hung	01/17/2024	Attend to banking matter.	0.50	\$355	\$177.50
Angelina Hung	01/18/2024	Attend to banking matter.	0.20	\$355	\$71.00
Angelina Hung	01/29/2024	Attend to banking matter.	1.00	\$355	\$355.00
Angelina Hung	01/30/2024	Attend to banking matter.	0.50	\$355	\$177.50
Angelina Hung	01/31/2024	Attend to banking matter.	0.20	\$355	\$71.00
Angelina Hung	02/07/2024	Attend to banking matter.	1.10	\$355	\$390.50
Angelina Hung	02/08/2024	Attend to banking matter. Coordinate to send boxes to offsite storage.	2.40	\$355	\$852.00
Angelina Hung	02/12/2024	Coordinate offsite storage.	0.40	\$355	\$142.00
Angelina Hung	02/21/2024	Prepare banking reports.	0.40	\$355	\$142.00
Angelina Hung	02/22/2024	Attend to banking matter.	0.40	\$355	\$142.00
Angelina Hung	02/23/2024	Bank reconciliation for January 2024.	0.30	\$355	\$106.50
Angelina Hung	03/04/2024	Attend to banking matter.	0.70	\$355	\$248.50
Angelina Hung	03/05/2024	Attend to banking matter.	0.40	\$355	\$142.00
Angelina Hung	03/06/2024	Attend to banking matter.	0.30	\$355	\$106.50
Angelina Hung	03/07/2024	Attend to banking matter. Call with CRA, and prepare authorization form.	1.20	\$355	\$426.00
Angelina Hung	03/08/2024	Attend to banking matter.	0.50	\$355	\$177.50
Angelina Hung	03/19/2024	Attend to banking matter.	0.60	\$355	\$213.00
Angelina Hung	03/20/2024	Attend at bank and arrange courier.	0.60	\$355	\$213.00
Angelina Hung	03/26/2024	Bank reconciliation for Feb 2024.	0.90	\$355	\$319.50
Angelina Hung	03/27/2024	Prepare contractor invoice summary.	0.80	\$355	\$284.00
Total for Angelina Hung			16.50		\$5,857.50

Annette Chopowick - Technician

Annette Chopowick	01/10/2024	Finalize cheques, prepare envelopes and send via regular mail.	0.20	\$355	\$71.00
Annette Chopowick	01/16/2024	Finalize/print cheque.	0.10	\$355	\$35.50
Annette Chopowick	01/31/2024	Finalize and print cheque.	0.10	\$355	\$35.50
Annette Chopowick	03/06/2024	Finalize and print cheques.	0.20	\$355	\$71.00
Annette Chopowick	03/13/2024	Review account transaction reports and update GL schedule; advise G. Bourikas of current balance.	0.30	\$355	\$106.50
Total for Annette Chopowick			0.90		\$319.50
Grand Total			170.10	0.00	\$127,353.50



KPMG Inc.
Suite 4600 Bay Adelaide Centre
333 Bay Street
Toronto, ON M5H 2S5

Payment Address:
KPMG LLP, T4348
P.O. Box 4348, Station A
Toronto, ON M5W 7A6

June 20, 2024

Maple Bank - Toronto Branch
79 Wellington Street West
Suite 3500
Toronto, ON M5K 1K7

Consolidated Invoice : 7000461956
Reference : 2000496507
Client : 1002132300
Contact : Anamika Gadia
Telephone : (416) 777-3842
Email : agadia@kpmg.ca

Fees for the period of April 1 to May 31, 2024, for the services provided by KPMG Inc. In its role as Liquidator of the Toronto Branch of Maple Bank GmbH, in accordance with the Court order issued on February 16, 2016 under the Winding-Up and Restructuring Act.

Our Fee \$ 37,505.00 CAD

\$ **37,505.00** CAD

HST 4,875.66

Amount Due \$ **42,380.66** CAD

Payment is due upon receipt

GST/HST Number 12236 3153 RT0001 QST Registration 1023774310 TQ0001

CAD Cheque Payments: KPMG LLP, T4348, P.O. Box 4348, Station A, Toronto, ON M5W 7A6
Please return remittance advice with cheque.

CAD Wire Payments: Beneficiary: KPMG LLP
Bank Details: TD Canada Trust, 55 King St. West, Toronto, ON M5K 1A2, Bank Code # 004, Transit # 10252,
Account # 0938281, Swift Code TDOMCATTOR
Please e-mail related wire payment details including invoice number to kpmg-ar@kpmg.ca

Invoice No: 7000461956 **Reference:** 2000496507 **Client:** 1002132300 **Amount:** \$ 42,380.66 CAD

Maple Bank
Time Details
April 1 to May 31, 2024

Name	Position	Rate	Hours	Fees (\$)
Nick Brearton	Partner	\$ 1,055.00	12.9	\$ 13,609.50
George Bourikas	Sr. Manager	\$ 990.00	15.1	\$ 14,949.00
Mackenzie Wong	Sr. Consultant	\$ 495.00	10.4	\$ 5,148.00
Angelina Hung	Technician	\$ 355.00	10.4	\$ 3,692.00
Annette Chopowick	Technician	\$ 355.00	0.3	\$ 106.50
Total			49.1	\$ 37,505.00
HST				\$ 4,875.65
Total Amount due				\$ 42,380.66

Maple Bank
Time Details
April 1 to May 31, 2024

Employee Name	Date	Time Narrative	Hours	Rate	Fees (\$)
<u>Nick Brearton - Partner</u>					
Nick Brearton	04/03/2024	Review and approval of various disbursements. Email to BLG (A. MacFarlane) re: McCarthy contact for Final Data Transfer letter. Review and approval of revised Oct 1 – Dec 31, 2023 invoice.	0.30	\$1,055.00	\$316.50
Nick Brearton	04/09/2024	Partial review of Jan 1 to Mar 31, 2024 invoice details. Review of EY invoice dated Apr 8, 2024.	2.90	\$1,055.00	\$3,059.50
Nick Brearton	04/10/2024	Complete review of Jan 1 to Mar 31, 2024 invoice details.	0.80	\$1,055.00	\$844.00
Nick Brearton	04/12/2024	Review and respond to G. Bourikas's email to BLG on MFGI stakeholder letter follow-up. Review of German Insolvency Administrator's (GIA) email dated Apr 12 re: status of MBTor Wind-down. Review of G. Bourikas's proposed response and subsequent call to discuss revisions, deadline for MFGI stakeholder letter.	0.60	\$1,055.00	\$633.00
Nick Brearton	04/17/2024	Review of CRA's response to our letter commenting on their latest refund calculations, including review of our initial letter and CRA's T7W-Cs. Email to G. Bourikas re: EY involvement. Review of draft BLG letter seeking recipients response to their MFGI stakeholder letter.	0.40	\$1,055.00	\$422.00
Nick Brearton	04/22/2024	Review of Apr 25th Court Materials sent to Service List. Discussion with G. Bourikas re: Notice of Motion for Apr 25th hearing, emails to BLG and EY.	0.50	\$1,055.00	\$527.50
Nick Brearton	04/24/2024	Review of latest revisions to Mar 31, 2024 invoice including follow-up on certain entries. Review of RBC revised interest agreement and approve entering into same.	0.50	\$1,055.00	\$527.50
Nick Brearton	04/25/2024	Prep for Court hearing. Attend Court hearing with M. Wong re: fee review by Assoc Justice Ilchenko. Discussion with M. Wong re: info requested by Court, opposition to data transfer. Prepare notes re: Court hearing. Discussion with BLG (A. MacFarlane and N. Hollard) and G. Bourikas re: opposition to data transfer and next steps, Court hearing outcome. Discussion with G. Bourikas on next steps on Court's information request and on data transfer. Review of Court Endorsement.	2.10	\$1,055.00	\$2,215.50
Nick Brearton	04/30/2024	Final revisions to Mar 31, 2024 invoice. Review of draft outline for 17th Court Report and prepare comments on same. Emails to BLG (A. MacFarlane) re: views on opposition to data transfer. Email to EY re: analysis of CRA proposal.	1.00	\$1,055.00	\$1,055.00
Nick Brearton	05/01/2024	Review of RBC Quarterly Report on Portfolio. Review of BLG's (D. Michaluk) response on data transfer opposition. Review of EY's (E. Coddington) response on CRA proposal. Review of past correspondence with CRA on issues raised by EY.	0.40	\$1,055.00	\$422.00
Nick Brearton	05/02/2024	Discussion with G. Bourikas re: response to CRA proposal to issue NOAs given EY's input, data transfer issues given BLG's (D. Michaluk) email.	0.60	\$1,055.00	\$633.00
Nick Brearton	05/03/2024	Review of BLG's (D. Michaluk) email re: data transfer opposition. Email to G. Bourikas re: A. MacFarlane's call with Stikeman. Review of EY's latest email on CRA proposal and subsequent email to G. Bourikas okaying CRA proposal acceptance.	0.40	\$1,055.00	\$422.00
Nick Brearton	05/06/2024	Coordinate issuance of Mar 31, 2024 invoice. Approve payment of various invoices.	0.20	\$1,055.00	\$211.00
Nick Brearton	05/08/2024	Review of RBC Investment Guideline email. Email to G. Bourikas on scope of same.	0.10	\$1,055.00	\$105.50
Nick Brearton	05/13/2024	Various internal emails to arrange new internal billing codes. Review of A. MacFarlane's email re: call with Blakes and McCarthy on data transfer.	0.20	\$1,055.00	\$211.00
Nick Brearton	05/14/2024	Email to G. Bourikas re: realization request of Ilchenko and subsequent discussion with G. Bourikas and M. Wong on same.	0.40	\$1,055.00	\$422.00
Nick Brearton	05/21/2024	Review of Dept of Justice's response to 2014 EID dispute. Review of EY settlement spreadsheet to evaluate response. Discussion with G. Bourikas re: Justice's response and issues to have EY look at.	1.40	\$1,055.00	\$1,477.00
Nick Brearton	05/27/2024	Various emails to/from BLG re: opposition to data transfer.	0.10	\$1,055.00	\$105.50
Total For Nick Brearton			12.90		\$13,609.50

George Bourikas - Sr. Manager

George Bourikas	04/01/2024	Review K. Campbell invoice for March 2024 IT monitoring fees and coordinate payment of same; Review N. Brearton comments on invoice for period ending December 31, 2023; Coordinate finalization of same; Review L. Lai invoice for March 2024 accounting services and coordinate payment of same.	0.70	\$990	\$693.00
George Bourikas	04/02/2024	Review Cloud Island invoice for April 2024 IT services and coordinate payment of same; Email to BLG re: delivery of MFGI stakeholder letter to National Bank.	0.30	\$990	\$297.00
George Bourikas	04/03/2024	Correspondence re: service issues; Attend to billing matters.	0.30	\$990	\$297.00
George Bourikas	04/04/2024	Attend to billing matters; Correspondence with G. Wega re: RBC investment accounts.	0.30	\$990	\$297.00
George Bourikas	04/09/2024	Review RBC DS account statement.	0.10	\$990	\$99.00
George Bourikas	04/10/2024	Review EY tax invoice and coordinate payment of same.	0.20	\$990	\$198.00
George Bourikas	04/12/2024	Correspondence with BLG (N. Miklaucic) re: CRA settlement; Review GIA (J. Kuhne) notes on MBTor Wind-down liquidation update to Creditor Committee and prepare markup of same; Email to N. Brearton re: same; Email to BLG re: MFGI stakeholder letter status; Call with N. Brearton re: reply to GIA email; Issue reply to GIA email.	1.70	\$990	\$1,683.00
George Bourikas	04/15/2024	Review Cloud Island IT scorecard for March 2024; Correspondence re: Court hearing.	0.20	\$990	\$198.00
George Bourikas	04/16/2024	Review email from Justice re: CRA interest calculations; Update file to-do list; Email to BLG re: MFGI stakeholder follow-up letters.	0.40	\$990	\$396.00

George Bourikas	04/17/2024	Review draft follow-up letter to MFGI stakeholders; Email to EY (E. Coddington) re: CRA tax calculations and next steps; Partially prepare outline for Seventeenth Report of the Liquidator.	0.80	\$990	\$792.00
George Bourikas	04/18/2024	Finalize preparation of outline for Seventeenth Report of the Liquidator and email to N. Brearton; Correspondence re: service; Coordinate updates to Liquidator's creditor website.	0.70	\$990	\$693.00
George Bourikas	04/19/2024	Review fee approval motion materials; Email to N. Brearton re: same.	0.30	\$990	\$297.00
George Bourikas	04/22/2024	Call with N. Brearton re: fee approval materials; Email to BLG re: same; Email to EY re: CRA tax calculations; Review RBC interest rate change document and execute same; Coordinate updates to creditors website.	1.10	\$990	\$1,089.00
George Bourikas	04/23/2024	Review updates to Liquidator's creditor website.	0.10	\$990	\$99.00
George Bourikas	04/24/2024	Follow-up with EY (E. Coddington) re: CRA tax appeal review; Attend to billing matters.	0.40	\$990	\$396.00
George Bourikas	04/25/2024	Various correspondence re: data transfer; Call with BLG (A. MacFarlane, N. Holland) and N. Brearton re: Fee approval Court hearing, BLG's call with MFGI stakeholder on data transfer, next steps; Subsequent debrief call with N. Brearton.	0.90	\$990	\$891.00
George Bourikas	04/26/2024	Review BLG invoice for legal fees for period ended March 31, 2024 and coordinate payment of same.	0.20	\$990	\$198.00
George Bourikas	04/30/2024	Correspondence re: MFGI stakeholders and data transfer; Review quarterly portfolio review report for invested funds.	0.20	\$990	\$198.00
George Bourikas	05/02/2024	Review K. Campbell invoice for IT monitoring fees for April 2024 and coordinate payment of same; Review email from EY (E. Coddington) re: CRA calculations; Review email from BLG (D. Michaluk) re: data transfer issues; Call with N. Brearton re: CRA calculations and data transfer issues; Email to EY (E. Coddington); Email to BLG (A. MacFarlane and N. Miklaucic) re: data transfer issues.	1.20	\$990	\$1,188.00
George Bourikas	05/03/2024	Email to BLG (N. Miklaucic) re: CRA effective interest dates and reassessment notices; Review L. Lai invoice for April 2024 accounting services and coordinate payment of same; Correspondence with BLG re: data transfer issue.	0.60	\$990	\$594.00
George Bourikas	05/07/2024	Review RBC DS investment guidelines.	0.10	\$990	\$99.00
George Bourikas	05/08/2024	Coordinate updates to creditors website.	0.10	\$990	\$99.00
George Bourikas	05/09/2024	Coordinate invoice payments.	0.20	\$990	\$198.00
George Bourikas	05/13/2024	Review email from BLG (A. MacFarlane) re: MFGI commingled data.	0.10	\$990	\$99.00
George Bourikas	05/14/2024	Call with M. Wong and N. Brearton re: fee analysis for Assoc Justice Ilchenko. Various discussion with M. Wong re: issues related to the preparation of R&D and related recovery analysis requested by the Court.	0.70	\$990	\$693.00
George Bourikas	05/16/2024	Review monthly RBC DS investment account statement.	0.10	\$990	\$99.00
George Bourikas	05/21/2024	Review CRA response re: loss carrybacks and effective interest dates; Call with N. Brearton re: same; Email to EY (E. Coddington) re: same.	1.20	\$990	\$1,188.00
George Bourikas	05/22/2024	Review summary of fees vs recoveries as requested by Assoc Justice Ilchenko.	0.50	\$990	\$495.00
George Bourikas	05/27/2024	Follow-up email to EY (E. Coddington); Review correspondence from N. Brearton and BLG (A. Macfarlane) re: opposition to final data transfer order.	0.20	\$990	\$198.00
George Bourikas	05/28/2024	Review BLG invoice for fees to April 30, 2024 and coordinate payment of same.	0.20	\$990	\$198.00
George Bourikas	05/29/2024	Prepare fee/recovery analysis as requested by Assoc Justice Ilchenko.	0.40	\$990	\$396.00
George Bourikas	05/31/2024	Email to N. Brearton re: CRA calculations; Call with M. Wong re: R&D.	0.60	\$990	\$594.00
Total For George Bourikas			15.10		\$14,949.00

Mackenzie Wong - Sr. Consultant

Mackenzie Wong	04/03/2024	Analysis of invoice time narratives Jan 1 to Mar 31, 2024 invoice.	0.80	\$495	\$396.00
Mackenzie Wong	04/05/2024	Internal correspondence re: draft invoice to N. Kanda; internal correspondence re: draft invoice to N. Brearton.	0.20	\$495	\$99.00
Mackenzie Wong	04/22/2024	Optimize documents to be uploaded onto the Liquidator's website; subsequent upload.	0.50	\$495	\$247.50
Mackenzie Wong	04/25/2024	Review documents in preparation of Court hearing; attend Court hearing with N. Brearton; discussion with N. Brearton on Court hearing and next steps; correspondence to BLG re: word documents of Sixteenth Report and Fee Affidavit.	1.20	\$495	\$594.00
Mackenzie Wong	05/08/2024	Update the Liquidator's website.	0.10	\$495	\$49.50
Mackenzie Wong	05/13/2024	Review R&D, discussion with A. Hung re: prior R&D analysis, discussion with G. Bourikas re: prior R&D analysis.	0.80	\$495	\$396.00
Mackenzie Wong	05/14/2024	Discussion with G. Bourikas and N. Brearton on recovery analysis; review prior CRA claims to determine tax recovery; discussion with G. Bourikas on interest calculation for recoveries.	1.00	\$495	\$495.00
Mackenzie Wong	05/22/2024	Preparation of R&D for recovery analysis; updating tax receipt notes, internal discussion with G. Bourikas re: assumptions for recovery analysis.	2.00	\$495	\$990.00
Mackenzie Wong	05/30/2024	Updates to R&D for recovery analysis.	0.70	\$495	\$346.50
Mackenzie Wong	05/31/2024	Preparation of R&D; call with G. Bourikas to review R&D.	3.10	\$495	\$1,534.50
Total For Mackenzie Wong			10.40		\$5,148.00

Angelina Hung - Technician

Angelina Hung	04/02/2024	Attend to banking matter.	0.90	\$355	\$319.50
Angelina Hung	04/03/2024	Attend to banking matter.	1.00	\$355	\$355.00
Angelina Hung	04/05/2024	Update receipt and prepare wire disbursement.	1.20	\$355	\$426.00
Angelina Hung	04/08/2024	Attend to banking matter.	0.30	\$355	\$106.50
Angelina Hung	04/09/2024	Attend to banking matter.	0.10	\$355	\$35.50
Angelina Hung	04/15/2024	Follow up call with CRA re: access and re-submit request form.	0.80	\$355	\$284.00
Angelina Hung	04/16/2024	Bank reconciliation for March'24.	0.90	\$355	\$319.50
Angelina Hung	04/22/2024	Attend to banking matter.	0.20	\$355	\$71.00
Angelina Hung	04/26/2024	Follow up access status with CRA.	0.40	\$355	\$142.00
Angelina Hung	04/29/2024	Attend to banking matter.	0.10	\$355	\$35.50
Angelina Hung	05/02/2024	Attend to banking matters.	0.80	\$355	\$284.00
Angelina Hung	05/06/2024	Attend to banking matter.	0.60	\$355	\$213.00
Angelina Hung	05/07/2024	Attend to banking matter.	0.70	\$355	\$248.50
Angelina Hung	05/08/2024	Attend to banking matter. Bank reconciliation for April'24.	0.90	\$355	\$319.50
Angelina Hung	05/10/2024	Attend to banking matter. Retrieve banking reports.	0.80	\$355	\$284.00
Angelina Hung	05/13/2024	Retrieve reports. Finalize wire payment.	0.60	\$355	\$213.00
Angelina Hung	05/16/2024	Attend to banking matter.	0.10	\$355	\$35.50
Total for Angelina Hung			10.40		\$3,692.00

Annette Chopowick - Technician

Annette Chopowick	04/24/2024	Open, scan and forward to staff the mail received.	0.10	\$355	\$35.50
Annette Chopowick	04/30/2024	Review and scan mail received; email to staff.	0.10	\$355	\$35.50
Annette Chopowick	05/08/2024	Finalize cheques and print	0.10	\$355	\$35.50
Total for Annette			0.30		\$106.50
Grand Total			49.10		\$37,505.00



KPMG Inc.
Suite 4600 Bay Adelaide Centre
333 Bay Street
Toronto, ON M5H 2S5

Payment Address:
KPMG LLP, T4348
P.O. Box 4348, Station A
Toronto, ON M5W 7A6

July 30, 2024

Maple Bank - Toronto Branch
79 Wellington Street West
Suite 3500
Toronto, ON M5K 1K7

Invoice : 8005569675
Reference : 3000543743
Client : 1002132300
Contact : Anamika Gadia
Telephone : (416) 777-3842
Email : agadia@kpmg.ca

Fees for the period of June 1 to June 30, 2024, for the services provided by KPMG Inc. In its role as Liquidator of the Toronto Branch of Maple Bank GmbH, in accordance with the Court order issued on February 16, 2016 under the Winding-Up and Restructuring Act.

Our Fee	\$ 46,098.00 CAD
	<hr/>
	\$ 46,098.00 CAD
HST	5,992.74
	<hr/>
Amount Due	<hr/> \$ 52,090.74 CAD <hr/>

Payment is due upon receipt

GST/HST Number 12236 3153 RT0001 QST Registration 1023774310 TQ0001

CAD Cheque Payments: KPMG LLP, T4348, P.O. Box 4348, Station A, Toronto, ON M5W 7A6
Please return remittance advice with cheque.

CAD Wire Payments: Beneficiary: KPMG LLP
Bank Details: TD Canada Trust, 55 King St. West, Toronto, ON M5K 1A2, Bank Code # 004, Transit # 10252,
Account # 0938281, Swift Code TDOMCATTOR
Please e-mail related wire payment details including invoice number to kpmg-ar@kpmg.ca

Invoice No: 8005569675 **Reference:** 3000543743 **Client:** 1002132300 **Amount:** \$ 52,090.74 CAD

Maple - File Completion**Time Details****June 1 to June 30, 2024**

Name	Position	Rate	Hours	Fees (\$)
Nick Brearton	Partner	\$ 1,055.00	12.8	\$ 13,504.00
George Bourikas	Sr. Manager	\$ 990.00	25.4	\$ 25,146.00
Mackenzie Wong	Sr. Consultant	\$ 495.00	10.6	\$ 5,247.00
Angelina Hung	Technician	\$ 355.00	6.1	\$ 2,165.50
Annette Chopowick	Technician	\$ 355.00	0.1	\$ 35.50
Total			55.0	\$ 46,098.00
HST				\$ 5,992.74
Total Amount due				\$ 52,090.74

Maple - File Completion
Time Details
June 1 to June 30, 2024

Employee Name	Date	Time Narrative	Hours	Rate	Fees (\$)
<u>Nick Brearton - Partner</u>					
Nick Brearton	06/03/2024	Review of BLG email outlining Teachers and National's final position on data transfer order. Review of various emails from G. Bourikas re: issues raised by McCarthy email, computer hardware and need to replace, data storage costs both monthly and since appointment as Data Custodian. Review of Data Custodian Order and most recent Court disclosure on reserves. Discussion with G. Bourikas re: data custodian issues raised by McCarthy email and next steps / info required. Subsequent documentation of next steps. Discussion with G. Bourikas re: potential Sungard role if data stored in Canada long term.	1.50	\$1,055.00	\$1,582.50
Nick Brearton	06/04/2024	Review of draft statement of R&D and Realization Analysis prepared by M. Wong pursuant to Assoc. Justice Ilchenko's request. Call with BLG (A. MacFarlane and N. Hollard) and G. Bourikas re: opposition to data transfer and issues associated with that / next steps, updating fee affidavit to May 31 and potential for Chief Justice Morawetz to approve stub fees. Subsequent call with G. Bourikas and M. Wong re: fees related to Data Custodian role, new fee approval process, computer hardware issues identified by K. Campbell and next steps. Review of email on next steps arising from KPMG / BLG call.	1.90	\$1,055.00	\$2,004.50
Nick Brearton	06/05/2024	Review of revised Realization Analysis. Subsequent call with G. Bourikas and M. Wong re: walk through of statement of R&D and revised Realization Analysis.	0.70	\$1,055.00	\$738.50
Nick Brearton	06/06/2024	Partial review of Apr 1 to May 31, 2024 time summary.	0.50	\$1,055.00	\$527.50
Nick Brearton	06/07/2024	Review of updated schedules for Assoc. Justice Ilchenko, including draft email to accompany materials and revise same. Call with G. Bourikas re: process to provide materials to Judge. Complete review of Apr 1 to May 31, 2024 time summary. Review of emails re: need for Supplemental report for new fee info. Subsequent review of draft Supplement to the 16th Report. Discussion with G. Bourikas re: comments on draft report.	2.10	\$1,055.00	\$2,215.50
Nick Brearton	06/10/2024	Review combined invoice for Apr 1 to May 31. Email to B. Miskiewicz re: revisions to draft invoice. Review of G. Bourikas's email re: agenda for call with BLG. Subsequent discussion with G. Bourikas re: agenda and BLG's discussion with TYR on assuming Data Custodian role. Review and approval of disbursement voucher.	0.60	\$1,055.00	\$633.00
Nick Brearton	06/12/2024	Review and update revised invoice for Apr 1 to May 31, 2024. Call with BLG (A. MacFarlane and N. Hollard), G. Bourikas and M. Wong re: TYR discussion and implications on their acting in a new data holder role, fee taxation report. Subsequent discussion with G. Bourikas and M. Wong re: call outcome and next steps.	1.80	\$1,055.00	\$1,899.00
Nick Brearton	06/13/2024	Review of Sungard contract re: liability of Sungard if any problems. Review latest revisions to May 31, 2024 time summaries. Email to G. Bourikas and M. Wong re: time entry queries.	0.40	\$1,055.00	\$422.00
Nick Brearton	06/14/2024	Review of response to time summary queries including clarifying same. Update time summary for comments.	0.30	\$1,055.00	\$316.50
Nick Brearton	06/18/2024	Review of final invoice revisions. Email to N. Kanda re: WIP details needed for invoice issuance.	0.20	\$1,055.00	\$211.00
Nick Brearton	06/19/2024	Review of EY email re: comments on Effective Interest Data for loss carryback to FY2014. Compare comments prior to EY schedule of loss carrybacks. Discussion with G. Bourikas re: EY email and clarifications required, agenda for GIA call. Prep for call with GIA. Call with GIA, Stikeman, BLG and G. Bourikas re: CRA status, data transfer and need to explore storing data in Canada, KPMG reporting to Court. Subsequent discussion with G. Bourikas re: next steps including topics K. Campbell to address in digital data accessibility memo.	2.20	\$1,055.00	\$2,321.00
Nick Brearton	06/20/2024	Internal emails on invoice issuance. Review of GIA email summarizing outcome of yesterday's call. Subsequent discussion with G. Bourikas re: his call with K. Campbell on IT memo, response to GIA email.	0.60	\$1,055.00	\$633.00
Total For Nick Brearton			12.80		\$13,504.00
<u>George Bourikas - Sr. Manager</u>					
George Bourikas	06/03/2024	Review McCarthy's correspondence re: data transfer order; Gather information to prepare for discussion with BLG on same; Email to N.Brearton re: same; Review Fourth Interim Distribution Order and Data Custodian Reserve costs; Correspondence with M. Wong re: same; Review K. Campbell invoice for May 2024 and coordinate payment of same; Call with N. Brearton re: McCarthy's data transfer order email; Email to M. Wong re: estimated reserves; Email to C. Walker re: third-party data custodian options; Call with K. Campbell re: Sungard server. Call with N. Brearton re: Sungard server.	3.80	\$990.00	\$3,762.00
George Bourikas	06/04/2024	Review Sungard invoice for June 2024 and coordinate payment of same; Call with N. Brearton, BLG re: final data transfer; Subsequent call with N. Brearton and M. Wong re: same; Various discussions with M. Wong re: same; Email to BLG re: to-do list and next steps; Call with K. Campbell re: Sungard server repairs; Email to N. Brearton re: same; Prepare summary of data custodian fees and disbursements.	3.60	\$990.00	\$3,564.00
George Bourikas	06/05/2024	Call with N. Brearton and M. Wong to walk through statement of R&D and Realization Analysis; Prepare Supplement to Sixteenth Report	2.30	\$990.00	\$2,277.00
George Bourikas	06/06/2024	Correspondence with G. Wegs of RBC re: investment maturities; Attend to billing matters; Detailed review of Realization Analysis and Statement of R&D for submission to Associate Justice Ilchenko and provide comments to M. Wong on same.	1.60	\$990.00	\$1,584.00
George Bourikas	06/07/2024	Calls with N. Brearton re: Associate Justice Ilchenko materials; Update same and circulate draft to A. MacFarlane; Review L. Lai invoice for May 2024 and coordinate payment of same.	1.00	\$990.00	\$990.00

George Bourikas	06/10/2024	Revise Supplement to the Sixteenth Report of the Liquidator; Review email from A. MacFarlane re: data custodians; Correspondence re: billing matters; Email to N. Brearton; Call with N. Brearton re: data custodian options, fee approval logistics; Email to A. MacFarlane.	1.70	\$990.00	\$1,683.00
George Bourikas	06/11/2024	Review RBC DS portfolio account statement for May 2024.	0.10	\$990.00	\$99.00
George Bourikas	06/12/2024	Call with BLG (A. MacFarlane, N. Hollard), N. Brearton and M. Wong re: Data Custodian issues, fee approval issues, general file update; Subsequent debrief call with N. Brearton and M. Wong; Email to N. Hollard re: Data Custodian estimated fees and disbursements; Review BLG comments on draft Supplement to the Sixteenth Report.	1.80	\$990.00	\$1,782.00
George Bourikas	06/13/2024	Correspondence re: call with GIA; Finalize Supplement to Sixteenth Report of the Liquidator and coordinate filing of same; Review Sungard contracts and email to N. Brearton re: same; Coordinate updates to Liquidator's website; Attend to billing matters.	2.30	\$990.00	\$2,277.00
George Bourikas	06/14/2024	Attend to billing matters.	0.20	\$990.00	\$198.00
George Bourikas	06/18/2024	Email to GIA re: call; Prepare for same; Email to N. Brearton re: same; Review and consider EY (E. Coddington) email re: analysis of CRA interest calculations and effective interest dates, and email to N. Brearton re: same.	0.60	\$990.00	\$594.00
George Bourikas	06/19/2024	Call with N. Brearton re: EY analysis of loss carrybacks and effective interest dates, and preparation for call with GIA; Review EY interest calculations; File update call with GIA; Subsequent debrief call with N. Brearton re: CRA matters, data transfer matters, K. Campbell data access memo; Email to EY (E. Coddington) re: interest calculations.	2.40	\$990.00	\$2,376.00
George Bourikas	06/20/2024	Review C. Schildt email re: data and CRA matters; Email to N. Brearton re: same; Call with K. Campbell re: Sungard memo; Call with N. Brearton re: C. Schildt email, Sungard memo. Prepare response email to C. Schildt re: data transfer and CRA issues; Review BLG invoice for period ended May 31, 2024 and coordinate payment of same; Coordinate payment of Liquidator invoice for period ended May 31, 2024; Correspondence with A. Hung re: physical records storage.	2.20	\$990.00	\$2,178.00
George Bourikas	06/26/2024	Review K. Campbell's memo on Sungard and provide comments thereon.	1.40	\$990.00	\$1,386.00
George Bourikas	06/27/2024	Review K. Campbell's revised memo on Sungard and provide comments thereon; Email to N. Brearton re: same.	0.40	\$990.00	\$396.00
Total For George Bourikas			25.40		\$25,146.00

Mackenzie Wong - Sr. Consultant

Mackenzie Wong	06/03/2024	Analyze SG&A expenditures and prepare table for estimated reserves; internal correspondence re: R&D tracker and Realization Analysis.	2.00	\$495	\$990.00
Mackenzie Wong	06/04/2024	Call with G. Bourikas and N. Brearton re: Realization analysis and Supplement to 16th Report; updates to realization analysis; updates to reserve analysis. Various discussions with G. Bourikas on same.	1.50	\$495	\$742.50
Mackenzie Wong	06/05/2024	Review time details re: April 1 - May 31, 2024 invoice; call and walkthrough with G. Bourikas and N. Brearton re: R&D and Realization Analysis; updates to R&D and Realization analysis; internal correspondence to recirculate updates; draft cover letter for R&D and Realization analysis.	3.50	\$495	\$1,732.50
Mackenzie Wong	06/06/2024	Review time details re: April 1 - May 31, 2024 invoice; update Realization Analysis and Statement of Receipts and Disbursements; email to N. Brearton re: same.	1.50	\$495	\$742.50
Mackenzie Wong	06/07/2024	Minor updates to Realization Analysis; internal correspondence re: same.	0.20	\$495	\$99.00
Mackenzie Wong	06/12/2024	Call with KPMG and BLG to discuss Data Custodian Order and supplementary report; discussion with G. Bourikas and N. Brearton after to discuss outstanding items; review supplementary report.	1.30	\$495	\$643.50
Mackenzie Wong	06/13/2024	Update to the Liquidator's website.	0.10	\$495	\$49.50
Mackenzie Wong	06/14/2024	Review and update time narratives re: April 1 - May 31 invoice.	0.20	\$495	\$99.00
Mackenzie Wong	06/19/2024	Review of tax calculation provided by EY.	0.30	\$495	\$148.50
Total For Mackenzie Wong			10.60		\$5,247.00

Angelina Hung - Technician

Angelina Hung	06/03/2024	Attend to banking matter.	0.60	\$355	\$213.00
Angelina Hung	06/05/2024	Attend to banking matter.	1.00	\$355	\$355.00
Angelina Hung	06/06/2024	Posting receipt from redemption.	0.30	\$355	\$106.50
Angelina Hung	06/07/2024	Arrange wire transfer and cheque payments. Bank reconciliation for May'24.	1.40	\$355	\$497.00
Angelina Hung	06/10/2024	Finalize wire and cheque payments.	0.70	\$355	\$248.50
Angelina Hung	06/11/2024	Finalize cheque and arrange mailing on same.	0.30	\$355	\$106.50
Angelina Hung	06/20/2024	Prepare wire disbursements, report on storage status.	1.30	\$355	\$461.50
Angelina Hung	06/21/2024	Finalize wire payment, post same and notify vendor.	0.50	\$355	\$177.50
Total for Angelina Hung			6.10		\$2,165.50

Annette Chopowick - Technician

Annette Chopowick	06/11/2024	Finalize/print cheques.	0.10	\$355	\$35.50
Total for Annette			0.10		\$35.50

Grand Total			55.00		\$46,098.00
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Appendix ‘H’

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

IN THE MATTER OF MAPLE BANK GmbH

AND IN THE MATTER OF THE *WINDING-UP AND RESTRUCTURING ACT*,
R.S.C. 1985, C.W-11, AS AMENDED

AND IN THE MATTER OF THE *BANK ACT*, S.C. 1991, C.46, AS AMENDED

BETWEEN:

ATTORNEY GENERAL OF CANADA

Applicant

- and -

MAPLE BANK GmbH

Respondent

**AFFIDAVIT OF CHRISTINE MASON
(Sworn August 16, 2024)**

I, CHRISTINE MASON, of the City of Toronto, in the Province of Ontario, **MAKE
OATH AND SAY AS FOLLOWS:**

1. I am a Partner at the law firm of Borden Ladner Gervais LLP (“**BLG**”), counsel to KPMG Inc. in its capacity as court-appointed liquidator (the “**Liquidator**”) of Maple Bank GmbH’s

(“**Maple Bank**”) business and assets in Canada (the “**Toronto Branch**”) as of February 16, 2016, and as such have knowledge of the matters set out below.

2. This affidavit is made in support of a motion for, *inter alia*, the approval of the fees and disbursements of BLG for the period January 31, 2024 to June 30, 2024 (the “**BLG Fee Period**”). Attached hereto and marked as **Exhibit “A”** is a summary of the hourly rates charged by the professionals at BLG for the BLG Fee Period. Attached hereto and marked as **Exhibit “B”** is a summary of the fees and disbursements for the BLG Fee Period.

3. The rates charged by BLG are comparable to the rates charged by other law firms in Toronto providing similar services.

4. Attached hereto and marked as **Exhibit “C”** are true copies of the accounts issued by BLG in respect of its services rendered the BLG Fee Period. A summary of BLG’s accounts is outlined below:

Hours	82.2 hours
Fees	\$65,174.00
Disbursements	\$453.15
HST	\$8,531.54
Total	\$74,158.69

5. The issues addressed by BLG, particularly with regard to GIA's request that all remaining data belonging to the Toronto Branch and Maple Securities Canada Limited, as currently held by the Data Custodian, be transferred to Germany, are complex and have required the ongoing involvement of partners at senior level who have the required level of expertise to address these issues.

6. I swear this affidavit in support of this motion for approval of BLG's fees and disbursements and for no improper purpose.

SWORN BEFORE ME over video)
teleconference this 16th day of August,)
2024, in accordance with O. Reg. 431/20.)
The affiant was located in Toronto,)
Ontario, while the commissioner, Mariela)
Adriana Gasparini, was located in)
Vaughan, Ontario.)



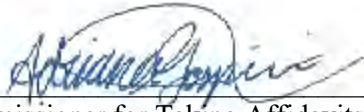
A Commissioner for Taking Affidavits)

LSO Licence No.: P14458



CHRISTINE MASON

This is Exhibit "A" referred to in the Affidavit of CHRISTINE MASON affirmed by CHRISTINE MASON of the City of Toronto, in the Province of Ontario, before me at the City of Vaughan, in the Province of Ontario, on August 16, 2024 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

A handwritten signature in blue ink, appearing to read "Alicia Pappas", is written over a horizontal line.

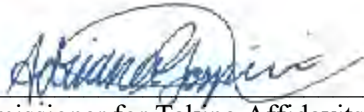
A Commissioner for Taking Affidavits

EXHIBIT “A”

**Summary of hourly rates charged by professionals at BLG
for the period from January 31, 2024 to June 30, 2024**

Name of Professional	Total Hours Billed	Avg. Hourly Rate (\$/Hr)	Total Amount Billed
Francis, Janice L.	0.60	\$355.00	\$213.00
Miklaucic, Natasha A.V.	3.20	\$1,255.00	\$4,016.00
MacFarlane, Alex	29.90	\$1,240.89	\$37,102.50
Gasparini, Adriana	24.60	\$330.00	\$8,118.00
Hollard, Nick	18.80	\$593.62	\$11,160.00
Michaluk, Daniel	5.10	\$895.00	\$4,564.50
Total Hours/Average Rate/Total Fees	82.20	\$792.87	\$65,174.00
Total Disbursements			\$453.15
Total Fees and Disbursements excluding Tax			\$65,627.15
Taxes			\$8,531.54
Total Fees and Disbursements including Tax			\$74,158.69

This is Exhibit “**B**” referred to in the Affidavit of CHRISTINE MASON affirmed by CHRISTINE MASON of the City of Toronto, in the Province of Ontario, before me at the City of Vaughan, in the Province of Ontario, on August 16, 2024 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

A handwritten signature in blue ink, appearing to read "Alicia Pappas", is written over a horizontal line.

A Commissioner for Taking Affidavits

EXHIBIT “B”

**Summary of Fees and Disbursements for BLG
for the period from January 31, 2024 to June 30, 2024**

DATE	INVOICE NUMBER	FEES	DISB	TAX	TOTAL FEES & DISB (PRE-TAX)	TOTAL FEES & DISB (POST-TAX)
2024-03-19	698365993	21,788.50	216.00	2,860.59	22,004.50	24,865.09
2024-04-25	698380318	7,779.00	71.20	1,020.53	7,850.20	8,870.73
2024-05-27	698391992	24,227.50	165.95	3,171.15	24,393.45	27,564.60
2024-06-18	698400519	3,838.00	-	498.94	3,838.00	4,336.94
2024-07-11	698409723	7,541.00	-	980.33	7,541.00	8,521.33
TOTAL:		\$65,174.00	\$453.15	\$8,531.54	\$65,627.15	\$74,158.69

This is Exhibit “C” referred to in the Affidavit of CHRISTINE MASON affirmed by CHRISTINE MASON of the City of Toronto, in the Province of Ontario, before me at the City of Vaughan, in the Province of Ontario, on August 16, 2024 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

A handwritten signature in blue ink, appearing to read "Adrienne Gosselin", is written over a horizontal line.

A Commissioner for Taking Affidavits



Borden Ladner Gervais LLP
Lawyers | Patent & Trade-mark Agents
Bay Adelaide Centre, East Tower
22 Adelaide Street West
Toronto, ON, Canada M5H 4E3
T 416.367.6000 F 416.367.6749
blg.com

KPMG Inc.
Suite 4600, 333 Bay Street
Bay Adelaide Centre
Toronto, ON M5H 2S5

March 19, 2024

Attention: Mr. Nick Brearton
President

Invoice # 698365993
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Re: Maple Bank GmbH

File No: 089171/000017

PROFESSIONAL SERVICES rendered to February 29, 2024 in connection with the above matter as described in the attached.

Fees	\$ 21,788.50
Disbursements and Other Charges	216.00
HST on Fees and Taxable Disbursements and Other Charges	2,860.59
Total this Invoice	\$ 24,865.09

THIS IS OUR ACCOUNT - E. & O.E.

BORDEN LADNER GERVAIS LLP


For: Alex MacFarlane

KPMG Inc.
Re: Maple Bank GmbH

March 19, 2024
Invoice # 698365993
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PROFESSIONAL SERVICES RENDERED to February 29, 2024

Jan 31, 2024	A. MacFarlane	0.20	Office discussion with N. Hollard re: [REDACTED]
Feb 2, 2024	D. Michaluk	0.30	Call with P. Hamilton regarding paragraph 4 of data transfer order and report to client.
Feb 4, 2024	D. Michaluk	0.60	Review draft response to GIA regarding final data transfer order and edit same.
Feb 5, 2024	N. Hollard	0.60	Review invoice redactions.
Feb 5, 2024	N. Hollard	0.20	Confer with A. MacFarlane re status of data transfer order; correspond with A. MacFarlane and D. Michaluk re meeting to discuss data transfer.
Feb 5, 2024	A. MacFarlane	0.20	Email from J. Kuhne re: data transfer order.
Feb 6, 2024	N. Hollard	0.60	Review invoice redactions.
Feb 6, 2024	D. Michaluk	0.10	Confer with P. Hamilton regarding [REDACTED] order and report to KPMG.
Feb 7, 2024	D. Michaluk	0.20	Review adjusted draft data transfer order and report to KPMG.
Feb 9, 2024	A. Gasparini	1.70	Review KPMG fee affidavit and revise BLG fee affidavit; review invoices and email J. Bienkowska re invoice discrepancy; redact invoice.
Feb 12, 2024	A. Gasparini	1.50	Apply redactions to invoices and organize all invoices; revise affidavit of fees and send to N. Hollard with comments for review.
Feb 12, 2024	N. Hollard	1.20	Review invoice redactions; revise fee affidavit.
Feb 13, 2024	A. Gasparini	1.00	Review invoices; revise fees affidavit, conduct blackline and send to N. Hollard.
Feb 13, 2024	N. Hollard	0.50	Review draft order re data disposition; call with D. Michaluk and A. MacFarlane re data issues.
Feb 13, 2024	A. MacFarlane	0.40	Office discussion with D. Michaluk and N. Hollard to discuss draft data transfer order.
Feb 14, 2024	A. Gasparini	0.80	Compile invoices and attend meeting with N. Hollard regarding finalizing affidavit of fees.
Feb 14, 2024	N. Hollard	0.30	Review fee affidavit; confer with A. Gasparini re fee affidavit and invoices.
Feb 16, 2024	A. Gasparini	1.00	Review invoices and revise affidavit of fees.

March 19, 2024

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KPMG Inc.
Re: Maple Bank GmbH

Feb 21, 2024	A. Gasparini	0.70	Revise affidavit of fees; conduct blackline and send to N. Hollard.
Feb 22, 2024	N. Hollard	0.80	Review and revise fee affidavit; correspond with A. MacFarlane and A. Gasparini re same.
Feb 23, 2024	A. Gasparini	1.00	Attend call with A. MacFarlane and N. Hollard and KPMG to discuss finalizing affidavit of fees and report; revise affidavit of fees; conduct blackline and send to A. MacFarlane and N. Hollard for review and approval and send copy to KPMG.
Feb 23, 2024	N. Hollard	0.80	Review fee affidavit of KPMG and correspond with A. MacFarlane re same; call with N. Brearton and M. Wong re fee affidavit.
Feb 23, 2024	A. MacFarlane	0.10	Office discussion with N. Hollard re: fee approval affidavit.
Feb 23, 2024	A. MacFarlane	0.20	Review and revise BLG fee affidavit.
Feb 23, 2024	A. MacFarlane	0.60	Review of affidavit of N. Brearton.
Feb 23, 2024	A. MacFarlane	0.30	Review of fee affidavit of B. Brooksbank.
Feb 23, 2024	A. MacFarlane	0.40	Telephone conference call with M. Wong, N. Hollard, N. Brearton and A. Gasparini to discuss fee affidavit approval issues.
Feb 23, 2024	A. MacFarlane	0.20	Emails to and from N. Brearton and M. Wong re: report and fee affidavit.
Feb 23, 2024	A. MacFarlane	0.30	Email to A. Gasparini re: B. Brooksbank fee affidavit.
Feb 23, 2024	N.A.V. Miklaucic	0.30	Discussion with DOJ and follow up with N. Hollard and G. Bourikas.
Feb 24, 2024	N.A.V. Miklaucic	0.30	Discussion with N. Hollard and G. Bourikas and follow up with A. Bornstein - DOJ
Feb 26, 2024	A. Gasparini	0.60	Revise fees affidavit, conduct blackline, and separate our tasks in a different document for ease and forward to N. Hollard and A. MacFarlane; attend call with A. MacFarlane, N. Hollard, M. Wong and N. Brearton re fee affidavit and report; conduct blackline of report and send to N. Hollard and A. MacFarlane; coordinate with B. Brooksbank for availability to swear fees affidavit.
Feb 26, 2024	N. Hollard	0.70	Call with N. Brearton, G. Bourikas, and M. Wong re sixteenth report and fee affidavits; review and revise sixteenth report of the Liquidator.

KPMG Inc.
Re: Maple Bank GmbH

March 19, 2024
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Feb 26, 2024	A. MacFarlane	0.40	Telephone conference call with N. Brearton, G. Bourikas, N. Hollard and A. Gasparini to discuss liquidators report and fee approval affidavit.
Feb 27, 2024	A. Gasparini	1.20	Finalize and compile BLG fees affidavit and send to N. Hollard and A. MacFarlane; commission fee affidavit with B. Brooksbank; correspond with N. Hollard and A. MacFarlane regarding fees affidavit; revise KPMG's fee affidavit; finalize and compile KPMG's fee affidavit and send to M. Wong and N. Brearton; commission fee affidavit with N. Brearton; send sworn fee affidavit to M. Wong and N. Brearton.
Feb 27, 2024	N. Hollard	0.80	Review and revise affidavit of N. Brearton; confer with A. MacFarlane re redaction of KPMG invoices; correspond with M. Wong re KPMG redactions; call with A. Gasparini re finalizing affidavit and exhibits
Feb 27, 2024	A. MacFarlane	0.20	Review of N. Brearton Affidavit.
Feb 27, 2024	A. MacFarlane	0.20	Review of Affidavit of B. Brooksbank.
Feb 27, 2024	A. MacFarlane	0.20	Review and revise Affidavit of N. Brearton.
Feb 27, 2024	A. MacFarlane	1.30	Review of Sixteenth Report of the Liquidator.
Feb 27, 2024	A. MacFarlane	1.50	Review and revise Sixteenth Report of the Liquidator.
Feb 27, 2024	A. MacFarlane	0.20	Discussion with N. Hollard re: Fee Affidavit.
Feb 27, 2024	A. MacFarlane	0.20	Follow-up discussion with N. Hollard re: Fee Affidavit.
Feb 27, 2024	A. MacFarlane	0.10	Office discussion with A. Gasparini re: Fee Affidavit of N. Brearton.
Feb 27, 2024	A. MacFarlane	0.20	Emails to and from N. Hollard re: Report and Fee Affidavit.
Feb 27, 2024	A. MacFarlane	0.20	Email to A. Gasparini re: Fee Affidavit.
Feb 27, 2024	A. MacFarlane	0.20	Discussion with N. Hollard re: revisions to Report and Fee Affidavit.
Feb 27, 2024	A. MacFarlane	0.20	Email to N. Brearton, G. Bourikas and M. Wong re: revised Sixteenth Report.

KPMG Inc.
Re: Maple Bank GmbH

March 19, 2024
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Feb 28, 2024	A. Gasparini	1.00	Finalize compiled report and revise bookmarking; review endorsement of Associate Justice Ilchenko re filing procedures; upload report to CaseLines; correspond with Bankruptcy Court regarding Court filing; send report and email with instructions to e-filing clerks for Commercial List filing; correspond with copycentre and D. Lau and W. Hall regarding instructions for hardcopy of report per Associate Justice Ilchenko's request; confirm with court clerk that Associate Justice Ilchenko received the hardcopy report; email KPMG confirming filing of report.
Feb 28, 2024	N. Hollard	0.10	Call with A. Gasparini re finalizing report and affidavits for filing.
Feb 28, 2024	A. MacFarlane	0.10	Review of revised draft letter to shareholders of MFGI.
Feb 28, 2024	A. MacFarlane	0.30	Review of revised final Data Transfer Order.
Feb 28, 2024	A. MacFarlane	0.20	Review of revised Fee Affidavit.
Feb 28, 2024	A. MacFarlane	0.20	Review of further revised final Data Transfer Order.
Feb 28, 2024	A. MacFarlane	0.10	Email to G. Bourikas and A. Gasparini re: revisions to Report.
Feb 28, 2024	A. MacFarlane	0.10	Email to and from D. Michaluk re: draft letter.
Feb 28, 2024	A. MacFarlane	0.20	Email to D. Michaluk re: revisions to paragraph 8 of the Data Transfer Order.
Feb 28, 2024	D. Michaluk	0.70	Review GIA proposed amendments and provide responsive feedback to M. Wong and team regarding the same.
Feb 29, 2024	N. Hollard	0.30	Call with A. Gasparini re fee period for approval.

TO OUR FEES

\$ 21,788.50

FEE SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Avg. Rate/Hr.</u>	<u>Amount</u>
A. Gasparini	10.50	\$ 330.00	\$ 3,465.00

PAYABLE ON RECEIPT
INTEREST AT THE RATE OF 5.3% PER ANNUM MAY BE CHARGED ON ACCOUNTS WHICH ARE OVERDUE

GST/HST REGISTRATION # R869096974RT0001

KPMG Inc.
Re: Maple Bank GmbH

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N. Hollard	6.90	600.00	4,140.00
A. MacFarlane	9.20	1,275.00	11,730.00
D. Michaluk	1.90	895.00	1,700.50
N.A.V. Miklaucic	0.60	1,255.00	753.00
	<u>29.10</u>		<u>\$ 21,788.50</u>

DISBURSEMENTS AND OTHER CHARGES:

Taxable

G=GST; Q=QST; H=HST; P=PST

Binding Charges	\$10.50	H
Copies	<u>205.50</u>	H

Total Taxable Disbursements and Other Charges 216.00

Total Disbursements and Other Charges 216.00

Total Fees and Disbursements and Other Charges 22,004.50

HST on Fees and Taxable Disbursements and Other Charges 2,860.59

TOTAL THIS INVOICE \$ 24,865.09



Borden Ladner Gervais LLP
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KPMG Inc.
Suite 4600, 333 Bay Street
Bay Adelaide Centre
Toronto, ON M5H 2S5

March 19, 2024
Invoice # 698365993
AM/AM

Re: Maple Bank GmbH

File No: 089171/000017

REMITTANCE COPY

Fees	\$ 21,788.50
Disbursements and Other Charges	216.00
HST on Fees and Taxable Disbursements and Other Charges	2,860.59
	<hr/>
Total this Invoice	<u>\$ 24,865.09</u>

PLEASE REFER TO PAYMENT OPTIONS PAGE FOR REMITTANCE INFORMATION.



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KPMG Inc.
Suite 4600, 333 Bay Street
Bay Adelaide Centre
Toronto, ON M5H 2S5

April 25, 2024

Attention: Mr. Nick Brearton
President

Invoice # 698380318
Page 1

Re: Maple Bank GmbH

File No: 089171/000017

PROFESSIONAL SERVICES rendered to March 31, 2024 in connection with the above matter as described in the attached.

Fees	\$ 7,779.00
Disbursements and Other Charges	71.20
HST on Fees and Taxable Disbursements and Other Charges	1,020.53
Total this Invoice	\$ 8,870.73

THIS IS OUR ACCOUNT - E. & O.E.

BORDEN LADNER GERVAIS LLP


For: Alex MacFarlane

KPMG Inc.
Re: Maple Bank GmbH

April 25, 2024
Invoice # 698380318
File No: 089171/000017
Page 2

PROFESSIONAL SERVICES RENDERED to March 31, 2024

Mar 1, 2024	A. Gasparini	0.10	Send M. Wong final Sixteenth Report of KPMG submitted to Bankruptcy Court.
Mar 1, 2024	D. Michaluk	0.30	Edit draft order and return version to G. Bourikas.
Mar 4, 2024	A. Gasparini	0.40	Coordinate with A. MacFarlane and N. Brearton for Court conference hearing; send M. Wong summary request per Ilchenko AJ request; draft bankruptcy court time form and submit to Bankruptcy Court; forward court attendance invite to working group.
Mar 6, 2024	J.L. Francis	0.30	Review for compliance and submit a Requisition and Hourly Rates Chart via the court's online portal for acceptance into the court file.
Mar 6, 2024	A. Gasparini	0.50	Send summary of fees to D. Stubbs for Ilchenko AJ; draft requisition form and send to e-filing clerks for Court submission and upload document to CaseLines.
Mar 6, 2024	A. MacFarlane	0.20	Email to and from G. Bourikas re: draft order.
Mar 6, 2024	A. MacFarlane	0.10	Review of draft order.
Mar 6, 2024	D. Michaluk	0.10	Confer with G. Bourikas regarding text of final order.
Mar 7, 2024	A. MacFarlane	0.20	Email to and from D. Michaluk re: revisions to draft Order.
Mar 7, 2024	A. MacFarlane	0.20	Email to and from G. Bourikas and N. Brearton re: notes to discuss with respect to MFGI.
Mar 7, 2024	A. MacFarlane	0.10	Review of revised final Data Transfer Order.
Mar 7, 2024	D. Michaluk	0.50	Edit and circulate next and pre-final draft of data disposition order.
Mar 10, 2024	A. MacFarlane	0.20	Review of court officer's costs report.
Mar 10, 2024	A. MacFarlane	0.30	Emails to and from N. Hollard re: fee approval motions and preparation of notice of motion and factum.
Mar 11, 2024	A. Gasparini	0.20	Pull corporate profile report and correspond with N. Brearton and A. MacFarlane re corporate profile report.
Mar 11, 2024	A. Gasparini	0.30	Review federal corporation searches and request change of director information report and email eCore regarding same and email N. Brearton regarding change of director information report and send report.

KPMG Inc.
Re: Maple Bank GmbH

April 25, 2024
Invoice # 698380318
File No: 089171/000017
Page 3

Mar 11, 2024	A. MacFarlane	0.30	Emails to N. Brearton and A. Gasparini re: MFGI's directors.
Mar 11, 2024	A. MacFarlane	0.10	Email to and from N. Brearton re: MFGI's directors.
Mar 11, 2024	A. MacFarlane	0.20	Email to and from A. Gasparini re: MFGI's directors.
Mar 18, 2024	A. MacFarlane	0.20	Email to and from G. Bourikas re: sending notice to directors for MFGI.
Mar 18, 2024	A. MacFarlane	0.10	Email to N. Hollard and A. Gasparini re: service.
Mar 20, 2024	A. Gasparini	2.10	Receive instructions re letters to MFGI shareholder re Maple Bank; revise five letters; locate contact information and title for shareholder; correspond with A. MacFarlane regarding contact information and letters; send letters to shareholders; review lawyers information for NB and email A. MacFarlane and N. Hollard re same; email H. Meredith regarding counsel to NB.
Mar 20, 2024	N. Hollard	0.60	Call with A. Gasparini re data disposition letter; review and revise letter and draft order; call with A. Gasparini re finalizing and distributing letter and draft order.
Mar 20, 2024	A. MacFarlane	0.30	Review of letter to shareholders of MFGI.
Mar 20, 2024	A. MacFarlane	0.20	Office discussion with N. Hollard with respect to changes to letter to Order.
Mar 20, 2024	A. MacFarlane	0.30	Emails to A. Gasparini re: draft letter to MFGI shareholders.
Mar 20, 2024	A. MacFarlane	0.10	Emails to and from D. Michaluk re: letter to shareholders.
Mar 20, 2024	A. MacFarlane	0.20	Email to and from A. Gasparini re: draft letter.
Mar 21, 2024	A. MacFarlane	0.10	Email to and from D. Szirmak re: motions dates.
Mar 25, 2024	A. Gasparini	0.30	Correspond with A. MacFarlane regarding letters to MFGI shareholders; send letters to G. Bourikas and N. Brearton; send follow up email to H. Meredith re contact at McCarthy.
Mar 25, 2024	N.A.V. Miklaucic	0.40	Review letters from G. Bourikas and respond with recommendation/request.
Mar 26, 2024	A. Gasparini	0.40	Send letter to J. Sleeth and S. Bungarten and correspond with G. Bourikas and N. Brearton re same; respond to H. Meredith regarding service for National Bank.

KPMG Inc.
Re: Maple Bank GmbH

April 25, 2024
Invoice # 698380318
File No: 089171/000017
Page 4

Mar 26, 2024 N.A.V. Miklaucic 0.20 Follow up from G. Bourikas, send letter to CRA with explanation and request.

TO OUR FEES

\$ 7,779.00

FEE SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Avg. Rate/Hr.</u>	<u>Amount</u>
J.L. Francis	0.30	\$ 355.00	\$ 106.50
A. Gasparini	4.30	330.00	1,419.00
N. Hollard	0.60	600.00	360.00
A. MacFarlane	3.40	1,275.00	4,335.00
D. Michaluk	0.90	895.00	805.50
N.A.V. Miklaucic	0.60	1,255.00	753.00
	<u>10.10</u>		<u>\$ 7,779.00</u>

DISBURSEMENTS AND OTHER CHARGES:

<u>Taxable</u>	G=GST; Q=QST; H=HST; P=PST
Ecore Searches (Fees)	\$63.20 H
Ecore Searches (Govt. Disb.)	8.00 H
Total Taxable Disbursements and Other Charges	<u>71.20</u>

Total Disbursements and Other Charges 71.20

Total Fees and Disbursements and Other Charges 7,850.20



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KPMG Inc.
Re: Maple Bank GmbH

April 25, 2024
Invoice # 698380318
File No: 089171/000017
Page 5

HST on Fees and Taxable Disbursements and Other Charges	1,020.53
TOTAL THIS INVOICE	\$ 8,870.73



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KPMG Inc.
Suite 4600, 333 Bay Street
Bay Adelaide Centre
Toronto, ON M5H 2S5

April 25, 2024
Invoice # 698380318
AM/AM

Re: Maple Bank GmbH

File No: 089171/000017

REMITTANCE COPY

Fees	\$ 7,779.00
Disbursements and Other Charges	71.20
HST on Fees and Taxable Disbursements and Other Charges	1,020.53
	<hr/>
Total this Invoice	<u>\$ 8,870.73</u>

PLEASE REFER TO PAYMENT OPTIONS PAGE FOR REMITTANCE INFORMATION.



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KPMG Inc.
Suite 4600, 333 Bay Street
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Toronto, ON M5H 2S5

May 27, 2024

Attention: Mr. Nick Brearton
President

Invoice # 698391992
Page 1

Re: Maple Bank GmbH

File No: 089171/000017

PROFESSIONAL SERVICES rendered to April 30, 2024 in connection with the above matter as described in the attached.

Fees	\$ 25,247.50
Less Discount	(1,020.00)
Fee Balance	<u>24,227.50</u>
Disbursements and Other Charges	165.95
HST on Fees and Taxable Disbursements and Other Charges	<u>3,171.15</u>
Total this Invoice	<u>\$ 27,564.60</u>

THIS IS OUR ACCOUNT - E. & O.E.

BORDEN LADNER GERVAIS LLP

For: Alex MacFarlane

KPMG Inc.
Re: Maple Bank GmbH

May 27, 2024
Invoice # 698391992
File No: 089171/000017
Page 2

PROFESSIONAL SERVICES RENDERED to April 30, 2024

Apr 2, 2024	A. Gasparini	0.30	Correspond with G. Bourikas re letter to National Bank; send email to E. Block regarding letter.
Apr 3, 2024	A. Gasparini	0.40	Call E. Block and leave voicemail regarding carriage of file; speak with E. Block and email A. MacFarlane regarding call; call and leave T. Steep a voicemail regarding letter to national bank.
Apr 3, 2024	A. MacFarlane	0.20	Emails to and from A. Gasparini and N. Hollard with respect to delivery and service of letter on stakeholders counsel.
Apr 4, 2024	A. Gasparini	0.40	Call T. Sutton and leave voicemail and send email re letter to National Bank; speak with T. Sutton and revise letter and send to T. Sutton.
Apr 5, 2024	A. MacFarlane	0.30	Telephone attendance with T. Sutton to discuss final data transfer order.
Apr 9, 2024	N.A.V. Miklaucic	0.30	Discussion with A. Bornstein.
Apr 11, 2024	A. Gasparini	0.10	Send hearing date information to A. MacFarlane.
Apr 11, 2024	N. Hollard	0.70	Correspond with A. MacFarlane and A. Gasparini re materials for approval motion; correspond with A. Gasparini re draft order; draft factum for fee approval motion.
Apr 11, 2024	A. MacFarlane	0.20	Telephone discussion with A. Gasparini re: attendance before A. Ilchenko for taxation.
Apr 11, 2024	A. MacFarlane	0.20	Email to and from N. Hollard re: taxation motion.
Apr 11, 2024	N.A.V. Miklaucic	0.30	Follow up with A. Bornstein, discussion with A. Bornstein.
Apr 12, 2024	A. Gasparini	0.40	Draft fee approval order and send to N. Hollard.
Apr 12, 2024	N.A.V. Miklaucic	0.20	Further discussion with Arnold and follow up with Nick and George.
Apr 15, 2024	A. Gasparini	0.20	Correspond with A. MacFarlane and D. Stubbs regarding court time before Associate Justice Ilchenko re review of accounts.
Apr 15, 2024	N.A.V. Miklaucic	0.40	Review response from CRA and summary and follow up with G. Bourikas and N. Brearton.
Apr 16, 2024	A. Gasparini	0.70	Email A. MacFarlane re follow up letters; draft follow up letter to shareholder re response to draft order.

KPMG Inc.
Re: Maple Bank GmbH

May 27, 2024
Invoice # 698391992
File No: 089171/000017
Page 3

Apr 16, 2024	A. MacFarlane	0.20	Emails from G. Bourikas and N. Hollard re: supplemental letter to stakeholders.
Apr 17, 2024	A. Gasparini	0.90	Send follow up letter to MFGI shareholders to A. MacFarlane and N. Hollard for review; send draft letter to G. Bourikas and N. Brearton for approval; draft outstanding follow up letters for all required recipients and send to N. Hollard for final sign off; send follow up letter to S. Bungarten, W. Fung; J. Sleeth; I. Antonios, M. Chow, D. Szirmak, and T. Sutton.
Apr 17, 2024	N. Hollard	0.30	Review and revise follow-up letter re data disposition order.
Apr 17, 2024	N. Hollard	2.50	Draft factum re fee approval; review draft order re same.
Apr 17, 2024	A. MacFarlane	0.20	Review of supplemental letter to stakeholders.
Apr 17, 2024	N.A.V. Miklaucic	0.10	Follow up with G. Bourikas.
Apr 18, 2024	J.L. Francis	0.30	Review for compliance and submit a Factum, Book of Authorities and an Affidavit of Service via the court's online portal for acceptance into the court file.
Apr 18, 2024	A. Gasparini	3.90	Revise factum and draft, compile, side-bar and bookmark book of authorities and send to A. MacFarlane and N. Hollard for review; revise order; locate service list and compare service list; speak with N. Hollard regarding service list; locate 2022 affidavit of service; draft service list and send to N. Hollard and A. MacFarlane for review; serve fee approval factum, BOA and Sixteenth Report of KPMG Inc. upon service list; draft affidavit of service and swear affidavit with J. Palace; send court materials to e-filing clerks for court filing; file documents into iManage.
Apr 18, 2024	N. Hollard	0.80	Review and revise factum; review book of authorities; confer with A. Gasparini re service of motion materials.
Apr 18, 2024	A. MacFarlane	0.10	Review of revised fee approval order.
Apr 18, 2024	A. MacFarlane	0.40	Review of draft factum and book of authorities.
Apr 18, 2024	A. MacFarlane	0.30	Emails to and from N. Hollard re: factum and draft order.
Apr 18, 2024	A. MacFarlane	0.20	Email to and from N. Hollard and A. Gasparini re: revised draft order.

KPMG Inc.
Re: Maple Bank GmbH

May 27, 2024
Invoice # 698391992
File No: 089171/000017
Page 4

Apr 19, 2024	N. Hollard	0.40	Call with A. MacFarlane re items to be included in the factum; call with A. Gasparini re service if affidavits and service list.
Apr 19, 2024	A. MacFarlane	0.30	Emails to and from A. Gasparini and N. Hollard re: draft Order.
Apr 19, 2024	A. MacFarlane	0.50	Review of draft factum and order.
Apr 19, 2024	A. MacFarlane	0.20	Telephone attendance with N. Hollard re: factum.
Apr 22, 2024	A. Gasparini	0.20	Read instructions, revise BOA and email N. Hollard re same.
Apr 22, 2024	A. MacFarlane	0.20	Telephone attendance with N. Hollard to discuss Book of Authorities.
Apr 22, 2024	A. MacFarlane	0.20	Review of Book of Authorities.
Apr 22, 2024	A. MacFarlane	0.40	Review of Factum.
Apr 22, 2024	A. MacFarlane	0.20	Email to and from G. Bourikas re: attendance before Associate Judge Ilchenko.
Apr 22, 2024	A. MacFarlane	0.10	Email to and from N. Hollard re: Book of Authorities and Factum.
Apr 22, 2024	A. MacFarlane	0.20	Email to and from N. Hollard re: revisions to Factum.
Apr 23, 2024	A. Gasparini	0.60	Revise book of authorities and finalize factum and email N. Hollard re same; upload revised factum and book of authorities to CaseLines.
Apr 23, 2024	N. Hollard	0.50	Revise factum re fee approval.
Apr 23, 2024	A. MacFarlane	0.20	Email to and from N. Hollard re: factum and book of authorities.
Apr 23, 2024	A. MacFarlane	0.30	Review of revised Factum and Book of Authorities.
Apr 23, 2024	A. MacFarlane	0.20	Office discussion with N. Hollard re: revisions to Factum and Book of Authorities.
Apr 24, 2024	A. Gasparini	0.40	Revise and run blackline of factum, revise book of authorities and upload to caselines.
Apr 24, 2024	N. Hollard	0.50	Call with counsel for National Bank re data disposition order.
Apr 24, 2024	N. Hollard	0.20	Review revised factum; review factum in advance of hearing.
Apr 24, 2024	A. MacFarlane	0.50	Review of revised Book of Authorities and Factum.
Apr 24, 2024	A. MacFarlane	1.20	Preparation of submissions for court attendance.
Apr 24, 2024	A. MacFarlane	0.30	Review of revised Factum.

KPMG Inc.
Re: Maple Bank GmbH

May 27, 2024
Invoice # 698391992
File No: 089171/000017
Page 5

Apr 24, 2024	A. MacFarlane	1.00	Review of Sixteenth Report and appendices thereto.
Apr 24, 2024	A. MacFarlane	0.40	Telephone conference call with T. Sutton, D. Michaluk and N. Hollard to discuss final data transfer order [REDACTED]
Apr 24, 2024	A. MacFarlane	0.10	Email to and from A. Gasparini re: Factum and Book of Authorities.
Apr 24, 2024	A. MacFarlane	0.20	Email to and from A. Gasparini and N. Hollard re: Book of Authorities.
Apr 24, 2024	A. MacFarlane	0.30	Email to and from G. Bourikas and N. Brearton re: call with McCarthys and Torsys to discuss final data transfer order.
Apr 24, 2024	D. Michaluk	0.50	Attend meeting with Teachers and National Bank counsel.
Apr 25, 2024	A. Gasparini	0.30	Receive instructions from N. Hollard; email M. Wong regarding Word drafts of final Sixteenth Report of the Liquidator and final KPMG Fee Affidavit and send with final BLG Fee Affidavit to D. Stubbs to forward to AJ Ilchenko.
Apr 25, 2024	N. Hollard	0.20	Confer with A. Gasparini re documents for delivery to Ilchenko AJ.
Apr 25, 2024	N. Hollard	0.90	Prepare for and attend hearing re fee approval.
Apr 25, 2024	N. Hollard	0.50	Call with N. Brearton, G. Bourikas, and A. MacFarlane [REDACTED]
Apr 25, 2024	A. MacFarlane	0.70	Attendance before Associate Judge Ilchenko re: fee approval.
Apr 25, 2024	A. MacFarlane	0.20	Email to and from D. Michaluk re: opinion on final data transfer order.
Apr 25, 2024	A. MacFarlane	0.60	Preparation for appearance before Associate Justice Ilchenko.
Apr 25, 2024	A. MacFarlane	0.40	Telephone conference call with N. Brearton, G. Bourikas, N. Hollard and D. Michaluk to [REDACTED]
Apr 25, 2024	D. Michaluk	0.40	Review file and preliminary review of Baker opinions and confer with A. MacFarlane and N. Hollard regarding the same.

KPMG Inc.
Re: Maple Bank GmbH

May 27, 2024
Invoice # 698391992
File No: 089171/000017
Page 6

TO OUR FEES	\$ 25,247.50
Less Discount	(1,020.00)
FEE BALANCE	<u>24,227.50</u>

FEE SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Avg. Rate/Hr.</u>	<u>Amount</u>
J.L. Francis	0.30	\$ 355.00	\$ 106.50
A. Gasparini	8.80	330.00	2,904.00
N. Hollard	7.50	600.00	4,500.00
A. MacFarlane	11.20	1,275.00	14,280.00
D. Michaluk	0.90	895.00	805.50
N.A.V. Miklaucic	1.30	1,255.00	1,631.50
	<u>30.00</u>		<u>\$ 24,227.50</u>

DISBURSEMENTS AND OTHER CHARGES:

<u>Taxable</u>	G=GST; Q=QST; H=HST; P=PST
Binding Charges	\$35.45 H
Copies	<u>130.50 H</u>

Total Taxable Disbursements and Other Charges	<u>165.95</u>
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Total Disbursements and Other Charges	165.95
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Total Fees and Disbursements and Other Charges	<u>24,393.45</u>
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KPMG Inc.
Re: Maple Bank GmbH

May 27, 2024
Invoice # 698391992
File No: 089171/000017
Page 7

HST on Fees and Taxable Disbursements and Other Charges	3,171.15
TOTAL THIS INVOICE	\$ 27,564.60



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Toronto, ON M5H 2S5

May 27, 2024
Invoice # 698391992
AM/AM

Re: Maple Bank GmbH

File No: 089171/000017

REMITTANCE COPY

Fees	\$ 25,247.50
Less Discount	(1,020.00)
Fee Balance	<u>24,227.50</u>
Disbursements and Other Charges	165.95
HST on Fees and Taxable Disbursements and Other Charges	<u>3,171.15</u>
Total this Invoice	<u>\$ 27,564.60</u>

PLEASE REFER TO PAYMENT OPTIONS PAGE FOR REMITTANCE INFORMATION.



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KPMG Inc.
Suite 4600, 333 Bay Street
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Toronto, ON M5H 2S5

June 18, 2024

Attention: Mr. Nick Brearton
President

Invoice # 698400519
Page 1

Re: Maple Bank GmbH

File No: 089171/000017

PROFESSIONAL SERVICES rendered to May 31, 2024 in connection with the above matter as described in the attached.

Fees	\$ 3,838.00
Disbursements and Other Charges	0.00
HST on Fees and Taxable Disbursements and Other Charges	498.94
Total this Invoice	\$ 4,336.94

THIS IS OUR ACCOUNT - E. & O.E.

BORDEN LADNER GERVAIS LLP


For: Alex MacFarlane

KPMG Inc.
Re: Maple Bank GmbH

June 18, 2024
Invoice # 698400519
File No: 089171/000017
Page 2

PROFESSIONAL SERVICES RENDERED to May 31, 2024

May 1, 2024	D. Michaluk	1.00	Review file history and Baker options and report to N. Brearton and others [REDACTED]
May 2, 2024	D. Michaluk	0.20	Confer with A. MacFarlane regarding use of opinion.
May 3, 2024	D. Michaluk	0.20	Confer with G. Bourikas regarding sharing of Baker opinion.
May 4, 2024	N.A.V. Miklaucic	0.30	Review response from G. Bourikas; send follow up to A. Bornstein.
May 10, 2024	N. Hollard	0.40	Meeting with counsel for OTPP re data disposition order; correspond with T. Sutton re draft order.
May 10, 2024	A. MacFarlane	0.30	Telephone conference call with McCarthys and Blakes to discuss final data transfer order.
May 10, 2024	A. MacFarlane	0.20	Email to and from N. Brearton re: data transfer order.
May 10, 2024	A. MacFarlane	0.20	Email to P. Hamilton re: data transfer order.
May 17, 2024	N.A.V. Miklaucic	0.20	Response from DOJ and follow up with KPMG.
May 21, 2024	A. MacFarlane	0.10	Email to and from N. Brearton re: Final Data Transfer Order.
May 21, 2024	A. MacFarlane	0.10	Voicemail to P. Hamilton re: Data Transfer Order.
May 22, 2024	A. MacFarlane	0.20	Emails to and from P. Hamilton re: Data Transfer issues.
May 22, 2024	A. MacFarlane	0.10	Email to and from N. Brearton re: follow-up with GIA.
May 23, 2024	A. MacFarlane	0.10	Telephone attendance with P. Hamilton to discuss Data Transfer Order.
May 31, 2024	N. Hollard	0.10	Consider correspondence from T. Sutton re position of Teachers and National Bank re data transfer.

TO OUR FEES

\$ 3,838.00

FEE SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Avg. Rate/Hr.</u>	<u>Amount</u>
N. Hollard	0.50	\$ 600.00	\$ 300.00

PAYABLE ON RECEIPT
INTEREST AT THE RATE OF 5.3% PER ANNUM MAY BE CHARGED ON ACCOUNTS WHICH ARE OVERDUE

GST/HST REGISTRATION # R869096974RT0001



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KPMG Inc.
Re: Maple Bank GmbH

June 18, 2024
Invoice # 698400519
File No: 089171/000017
Page 3

A. MacFarlane	1.30	1,275.00	1,657.50
D. Michaluk	1.40	895.00	1,253.00
N.A.V. Miklaucic	0.50	1,255.00	627.50
	<u>3.70</u>		<u>\$ 3,838.00</u>

Total Fees and Disbursements and Other Charges	<u>3,838.00</u>
HST on Fees and Taxable Disbursements and Other Charges	<u>498.94</u>
TOTAL THIS INVOICE	<u>\$ 4,336.94</u>



Borden Ladner Gervais LLP
Lawyers | Patent & Trade-mark Agents
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22 Adelaide Street West
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blg.com

KPMG Inc.
Suite 4600, 333 Bay Street
Bay Adelaide Centre
Toronto, ON M5H 2S5

June 18, 2024
Invoice # 698400519
AM/AM

Re: Maple Bank GmbH

File No: 089171/000017

REMITTANCE COPY

Fees	\$ 3,838.00
Disbursements and Other Charges	0.00
HST on Fees and Taxable Disbursements and Other Charges	498.94
	<hr/>
Total this Invoice	<u>\$ 4,336.94</u>

PLEASE REFER TO PAYMENT OPTIONS PAGE FOR REMITTANCE INFORMATION.



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Suite 4600, 333 Bay Street
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Toronto, ON M5H 2S5

July 11, 2024

Attention: Mr. Nick Brearton
President

Invoice # 698409723
Page 1

Re: Maple Bank GmbH

File No: 089171/000017

PROFESSIONAL SERVICES rendered to June 30, 2024 in connection with the above matter as described in the attached.

Fees	\$ 7,661.00
Less Discount	(120.00)
Fee Balance	<u>7,541.00</u>
Disbursements and Other Charges	0.00
HST on Fees and Taxable Disbursements and Other Charges	<u>980.33</u>
Total this Invoice	<u><u>\$ 8,521.33</u></u>

THIS IS OUR ACCOUNT - E. & O.E.

BORDEN LADNER GERVAIS LLP

For: Alex MacFarlane

KPMG Inc.
Re: Maple Bank GmbH

July 11, 2024
Invoice # 698409723
File No: 089171/000017
Page 2

PROFESSIONAL SERVICES RENDERED to June 30, 2024

Jun 4, 2024	N. Hollard	1.10	Call with N. Brearton and G. Bourikas re objections raised to proposed data transfer order, further fee affidavits; confer with A. MacFarlane re next steps.
Jun 4, 2024	N. Hollard	0.10	Correspond with T. Sutton re data disposition concerns.
Jun 4, 2024	N. Hollard	0.10	Correspond with A. Gasparini re supplemental fee affidavit.
Jun 4, 2024	A. MacFarlane	1.00	Telephone conference call with N. Brearton, G. Bourikas and N. Hollard re: [REDACTED] and also the process to obtain fee approvals from Associate Justice Ilchenko.
Jun 4, 2024	A. MacFarlane	0.10	Follow-up discussion with N. Hollard with respect to Data Transfer Order and Fee Approval.
Jun 4, 2024	A. MacFarlane	0.20	Email to J. Bunting re: data custodian mandate.
Jun 4, 2024	A. MacFarlane	0.10	Email to P. Hamilton re: status of data transfer order discussions.
Jun 4, 2024	A. MacFarlane	0.20	Email to D. Michaluk re: data transfer issues.
Jun 6, 2024	A. Gasparini	0.50	Review and redact invoices and send to N. Hollard for review.
Jun 6, 2024	N. Hollard	0.10	Correspond with A. Gasparini re invoice redactions.
Jun 6, 2024	N. Hollard	0.30	Call with J. Bunting of Tyr LLP re potential role as data custodian.
Jun 7, 2024	N. Hollard	0.30	Review summary of professional fees and disbursements received from G. Bourikas and provide comments re same.
Jun 7, 2024	A. MacFarlane	0.30	Review of R&D statement for the liquidator with respect to fees/realizations by liquidator.
Jun 7, 2024	A. MacFarlane	0.20	Email to and from G. Bourikas re: additional motion materials to be filed with Associate Judge Ilchenko.
Jun 7, 2024	A. MacFarlane	0.20	Email to N. Brearton and G. Bourikas re: data custodian.
Jun 10, 2024	N. Hollard	0.50	Review invoices for January through March 2024; review draft supplemental report of the Liquidator.

KPMG Inc.
Re: Maple Bank GmbH

July 11, 2024
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Page 3

Jun 12, 2024	A. MacFarlane	0.70	Telephone conference call with N. Brearton, G. Bourikas and N. Hollard to discuss data transfer order and data custodian role.
Jun 12, 2024	A. MacFarlane	0.20	Review of supplemental to sixteenth report.
Jun 12, 2024	A. MacFarlane	0.10	Email to N. Hollard re: supplement to sixteenth report.
Jun 13, 2024	A. Gasparini	0.50	Correspond with A. MacFarlane and N. Hollard re Supplemental Report, compile signed Supplemental Report and Appendices A and B, bookmark and serve upon service list; upload document to CaseLines and send to JUS-G-MAG-CSD-Toronto-SCJ Bankruptcy to forward to Associate Justice Ilchenko.
Jun 13, 2024	N. Hollard	0.10	Review finalized supplemental report of the liquidator.
Jun 19, 2024	N. Hollard	0.50	Call with GIA and GIA counsel re data transfer issues.
Jun 19, 2024	A. MacFarlane	0.50	Telephone conference call with GIA, KPMG, P. Hamilton and N. Hollard to discuss data transfer issues and CRA settlement.
Jun 19, 2024	N.A.V. Miklaucic	0.20	Review response and follow up with A. Bornstein at DOJ.
Jun 28, 2024	A. MacFarlane	0.20	Email to Associate Justice Ilchenko re: fee approval.

TO OUR FEES	\$ 7,661.00
Less Discount	(120.00)
FEE BALANCE	<u>7,541.00</u>

FEE SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Avg. Rate/Hr.</u>	<u>Amount</u>
A. Gasparini	1.00	\$ 330.00	\$ 330.00
N. Hollard	3.10	600.00	1,860.00
A. MacFarlane	4.00	1,275.00	5,100.00
N.A.V. Miklaucic	0.20	1,255.00	251.00



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KPMG Inc.
Re: Maple Bank GmbH

July 11, 2024
Invoice # 698409723
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Page 4

8.30

\$ 7,541.00

Total Fees and Disbursements and Other Charges

7,541.00

HST on Fees and Taxable Disbursements and Other Charges

980.33

TOTAL THIS INVOICE

\$ 8,521.33



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**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

Proceedings Commenced at Toronto

**AFFIDAVIT OF CHRISTINE MASON
(Sworn August 16, 2024)**

BORDEN LADNER GERVAIS LLP

Bay Adelaide Centre, East Tower
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Alex MacFarlane (LSO No. 28133Q)

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Lawyers for KPMG Inc., in its capacity as
Liquidator of the business in Canada of Maple
Bank GmbH