



This is the 1st affidavit of
J. McEown in this case and
was made on August 3rd, 2018

NO. VLC-S-S-183355
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

ALL CANADIAN INVESTMENT CORPORATION

PLAINTIFF

AND:

BDO CANADA LLP

DEFENDANT

AND:

DONALD BERGMAN

THIRD PARTY

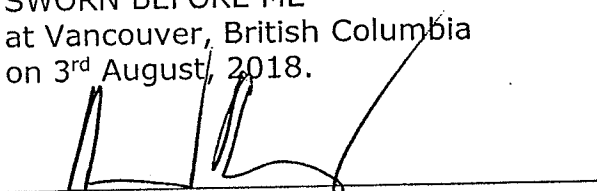
AFFIDAVIT

I, JOHN McEOWN, CPA, CA, CIRP (Chartered Insolvency and Restructuring Professional), of 1140 – 800 West Pender Street, in the City of Vancouver, Province of British Columbia, SWEAR (OR AFFIRM) THAT:

1. I am an officer of Boale Wood & Company, the Court appointed Monitor herein (the "Monitor") in the matter of the **Companies Creditors Arrangement Act** proceedings of All Canadian Investment Corporation ("ACIC") and as such have personal knowledge of the facts and matters hereinafter deposed to save and except where they are stated to be based upon information and belief, and as to those matters I verily believe them to be true.

2. Boale Wood was appointed Monitor of ACIC by Order of the Court on November 10, 2017.
3. In February of 2018, I was advised by Mr. Donald Bergman of ACIC of the intention on the part of ACIC to commence proceedings against BDO Canada LLP ("BDO") for damages caused to it by BDO's resignation as auditor.
4. At that time, I was also advised by Mr. Bergman, and verily believe it to be true, that the litigation contemplated against BDO would be pursued under a contingency fee agreement and that accordingly there would be no ongoing obligation on the part of ACIC to pay legal fees to fund the litigation.
5. Given this statement as to the manner in which the litigation was being conducted, I did not have any objection to ACIC commencing the action.
6. I have been provided with a copy of the Notice of Application by the Defendant seeking an order that ACIC post security for BDO's costs in the requested amount of \$126,773.80.
7. The current cash flow statement of ACIC that was filed in the Court on June 11, 2018 does not have a provision for the payment of the security that BDO is seeking.
8. In the Monitor's view, the posting of security in the amount of \$126,773.80 could be prejudicial to the stakeholders.

SWORN BEFORE ME
at Vancouver, British Columbia
on 3rd August, 2018.



A commissioner for taking
affidavits for British Columbia
Marianne Ting

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MARIANNE TING
A Commissioner for taking Affidavits
for the province of British Columbia
Expiry Date: Nov 30, 2020