



This is the 1<sup>st</sup> Affidavit  
of Peter Doetsch in this case  
and was made on 20/OCT/2021

NO. S-162335  
VANCOUVER REGISTRY

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

**BETWEEN:**

**JASTRAM PROPERTIES LTD.**

**PLAINTIFF**

**AND:**

**VIRGINIA MARY TAN, PATRICK ENG TIEN TAN,  
MARCUS SOON-KEEN TAN, LETAN INVESTMENTS MANAGEMENT, LETAN 88  
ENTERPRISES INC., TLD INVESTMENTS INC., 0994439 B.C. LTD., TJ0700 HOLDINGS  
LTD., and TJ132 VENTURES LTD.**

**DEFENDANTS**

Brought under the *Class Proceedings Act*, R.S.B.C. 1996, c. 50

**AFFIDAVIT**

I, Peter Doetsch, of 135 West Riverside Drive, North Vancouver, British Columbia, AFFIRM  
THAT:

1. I am an officer and director of the Plaintiff, Jastram Properties Ltd. ("JPL"), and as  
such have personal knowledge of the facts and matters to which I have deposed hereinafter, save  
and except where the same are stated to be on information and belief, and where so stated I verily  
believe them to be true. I am the person responsible for providing instructions on behalf of JPL to  
Bennett Mounteer LLP ("Class Counsel") concerning the conduct of this action.

2. I have reviewed with Class Counsel the Settlement Administration Plan ("Plan")  
attached to the notice issued to Class Members concerning the application to approve the Plan. I

agree with and approve the procedures and process set out in the Plan for the distribution of available settlement proceeds to Class Members. I also approve the payment of the proposed legal expenses for which Class Counsel seeks approval from the Court, in the amount of \$1,157,165, consisting of \$978,802 of legal fees, \$58,006 in disbursements and \$120,357 in taxes.

3. However, as I advised Class Counsel in reviewing the Plan and the proposed notice to be given to the Class concerning the application to approve the Plan, and as reflected in the notice of the application which was actually issued, I do not approve of the payment of \$250,000 to Trustee in Bankruptcy for Consolidated Estate of Virginia Mary Tan (the "Trustee") to fund the ongoing litigation brought by the Trustee against some of the "net-winners" in the Tan Investment Scheme, who recovered more from the Scheme than the total principal amount they invested in the Scheme. The basis for my objection is that I would rather have that \$250,000 distributed for the benefit of Class Members than risk those funds in an attempt to recover additional amounts for Class Members.

4. In making this objection, I understand that it is the view of the Trustee that the expenditure of \$250,000 to fund net-winner litigation will likely result in more money for the benefit of Class Members. However, there is no guarantee that this will be the case and there is no risk to the Trustee or to the Trustee's counsel in pursuing this net-winner litigation. I understand their fees will be paid regardless of whether there is any further recovery. In effect, the Class Members are being asked to take the risk of this litigation by providing funding for it to the Trustee. I would prefer that the \$250,000 be distributed to the Class rather than to take this risk.

5. In objecting to this proposed payment of \$250,000 to the Trustee, I do not wish my objection to be understood as a criticism of the Trustee. I have the highest regard for Mr. McEown and appreciate the services that he has provided as Trustee. My concern is simply that I would rather have the money distributed to the Class than to spend it on litigation with an uncertain recovery.

6. I have been provided by Class Counsel with an Interim Statement of Receipts and Disbursements issued this month by the Trustee, a copy of which is attached to this Affidavit as Exhibit "A". This Interim Statement shows that total receipts by the estate amount to \$1,636,311.63, of which \$1,360,586.65 constitutes settlement funds, and that the total

disbursements by the estate amount to \$1,412,720.38, which include Trustee fees and counsel fees in the total amount of \$994,701.67.

7. As shown in the Interim Statement, the receipts received and distributions made to date by the Trustee leaves \$223,591.25 for funding the estate or distribution to creditors of the estate. I understand that some of the expenses incurred by the Trustee would have been incurred even if no litigation had been commenced against the net-winners. I also understand some of the expenditures by the Trustee accrued to the benefit of the class proceeding and as a result, have increased the amount of settlement proceeds available for distribution to Class Members (since these expenditures did not need to be made in the class proceeding). Nevertheless, I am concerned that this level of expenditures shows that the Trustee payment of \$250,000 could be exhausted before additional amounts are recovered for the benefit of Class Members.

8. I have received e-mails from eight Class Members who also object to the proposed payment of \$250,000 to the Trustee, and copies of these e-mails are attached as Exhibit "B" to this Affidavit. I have noted the loss estimated by each of these Class Members on their e-mail. These Class Members have collectively suffered an estimated loss of \$3,727,300, and with JPL's net loss of \$4,814,034, this means that investors with a collective estimated loss of \$8,541,334 have objected to the proposed payment of \$250,000 to the Trustee. I expect I will receive further objections by the November 5, 2021 deadline for making objections.

9. I am 78 years old, and I know that like me, many Class Members are also elderly. I expect that many, like me, would prefer to have the maximum amount of money distributed now rather than wait for an uncertain amount of time for an uncertain amount of money in the future.

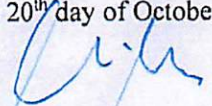
10. I have instructed Class Counsel to seek approval of the Plan in its present form, with the provision of the payment to the Trustee of \$250,000, on the basis that my objection to that payment be put before the Court with the other objections from Class members for consideration in determining whether to approve that aspect of the Plan. I am aware that Class Counsel is of the view that the payment of the \$250,000 to the Trustee is in the best interests of the Class, and that Class Counsel will take that position before the Court in presenting the Plan for approval and my objection to this provision. I have been advised by Class Counsel that I am entitled to have independent counsel represent my view about the payment to the Trustee, but I am content to have

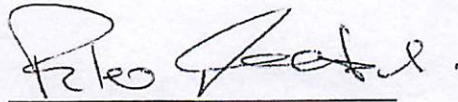




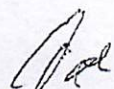
Class Counsel put forward my objection and I will accept the determination of the Court on this point.

11. The disbursements of \$58,006 included in the legal expenses for which Class Counsel seeks approval from the Court include a proposed disbursement of \$34,749.36 to JPL to reimburse it for the legal fees and disbursements (exclusive of GST) JPL paid in connection with the Maveria injunction, obtained in this action prior to the retainer of Class Counsel to pursue this action as a class proceeding. JPL is seeking reimbursement of these expenses on the basis that the Maveria injunction subsequently accrued for the benefit of all Class Members. Attached as Exhibit "C" to this Affidavit are four invoices for these fees and disbursements issued by JPL's former counsel between July 1, 2016 and September 30, 2017, until Class Counsel assumed conduct of the action.

AFFIRMED BEFORE ME by video technology in )  
Vancouver, British Columbia )  
this 20<sup>th</sup> day of October, 2021 )  
 )  
\_\_\_\_\_)  
A Commissioner for Taking Affidavits )  
in the Province of British Columbia )  
Mark W. Mounteer )

  
\_\_\_\_\_  
Peter Doetsch

THIS AFFIDAVIT was prepared by the law firm of Bennett Mounteer LLP, whose place of business and address for service is #400 – 856 Homer Street, Vancouver, British Columbia, V6B 2W5. Telephone: (604) 639-3680. Fax: (604) 639-3681. Counsel Reference: Paul R. Bennett and Mark W. Mounteer





District of British Columbia  
 Division No. 03 - Vancouver  
 Court No. B160364  
 Estate No. 11-253984

This is Exhibit "A" as referred to in  
 the affidavit of Peter Doetsch sworn 1  
 before me at Vancouver, BC this  
 20th day of October, 2021

In the matter of the bankruptcy of A Commissioner for taking  
 Virginia Mary Tan Affidavits within British Columbia  
 of the city of West Vancouver

In the Province of British Columbia  
 Form 12

Interim

Interim Statement of Receipts and Disbursements

**RECEIPTS**

1. Asset Realization		
Cash in bank	1,256.41	
Cash on hand	1,504.12	
House	167,226.76	
Automobile	33,325.19	
Accounts receivable	2,200.00	205,512.48
2. Tax Refund		
GST refund	1,044.45	
Post bankruptcy income tax refund	65.89	1,110.34
3. Miscellaneous		
Interest allocation	17,021.20	
Rental Income	1,300.00	
British Columbia Low Income Climate Action Tax Credit	414.76	
Repayment of Preference	50,366.00	
Settlement Funds	1,360,586.85	1,429,688.81
<b>TOTAL RECEIPTS</b>		<b>1,636,311.63</b>

**DISBURSEMENTS**

4. Fees Paid		
To official receiver	300.00	300.00
5. Notice of first meeting		
Local paper	584.25	584.25
6. Premium		
Bond or Surety premium	3,400.00	
Insurance	30,832.80	34,232.80
7. Other notices and reports		
To 158 creditors	280.00	280.00
8. Postage on general correspondence	520.40	520.40
9. Trustee's remuneration		
Trustee's fees	457,839.12	
GST charged on Trustee remuneration	22,557.84	480,396.96
10. Legal fees and legal services costs (taxed)		
Legal Counsel to estate	536,862.67	536,862.67
11. Federal and Provincial taxes		
GST paid on disbursements exclusive of fees	39,764.59	
GST on counselling fees	17.00	39,781.59
12. Counseling fees	340.00	340.00

District of British Columbia  
Division No. 03 - Vancouver  
Court No. B160364  
Estate No. 11-253984

2

In the matter of the bankruptcy of  
Virginia Mary Tan  
of the city of West Vancouver  
in the Province of British Columbia  
Form 12 — Concluded  
Interim Statement of Receipts and Disbursements

Interim

13. Miscellaneous

Search Fees	276.95	
Bank charges	111.20	
Photocopies	10,780.54	
Telephone	490.61	
Storage	2,134.45	
Travel	84.08	
Other misc disbursements	46.38	
Courier	739.62	
Legal fees/disbursements	3,119.82	
Ascend License Fee	340.00	
Consultants Fees	268,151.09	
GST on Ascend License Fee	17.00	
Meeting Facilities	185.00	
PST - Disbursements Paid	32,921.19	
PST on Ascend License Fee	23.80	319,421.71

**TOTAL DISBURSEMENTS**

**1,412,720.38**

Note: How much of the total disbursements was paid for  
services provided by persons related to the trustee?

0.00

Amount available for distribution

**223,591.25**

Dated at the city of Vancouver in the Province of British Columbia, this 18th day of October 2021.

McEwen and Associates Ltd. - Licensed Insolvency Trustee

  
110 - 744 West Hastings Street  
Vancouver BC V6C 1A5  
Phone: (604) 558-8020 Fax: (604) 558-8021



This is Exhibit "B" as referred to in the affidavit of Peter Doetsch sworn before me at Vancouver, BC this 20th day of October, 2021

A Commissioner for taking Affidavits within British Columbia

> -----Original Message-----  
> From: Farid Pascuas <pascuas123@gmail.com>  
> Sent: Sunday, October 17, 2021 11:36 PM  
> To: Peter Doetsch <PDoetsch@jastram.com>  
> Subject: Virginia Tan Class Action Notice  
>  
> Dear Peter,  
>  
> I oppose the proposed trustee payment plan,  
>  
> Stay safe,  
>  
> Farid Pascuas  
-----

\$ 681.000

From: i y <outoutout777@gmail.com>  
Sent: Sunday, October 17, 2021 9:27 AM  
To: peter.doetsch@gmail.com  
Subject:

Dear Peter ,

Thank you for starting the class action suit , I agree with the proposed settlement  
but object to the trustee payment

Best regards

Helen Shu ying ping

\$ 978.000

From: liqing ding <dingdali@yahoo.com>  
Sent: Friday, October 15, 2021 10:54 PM  
To: peter.doetsch@gmail.com  
Subject: VIRGINIA TAN CLASS ACTION NOTICE

Thank you Peter for commencing the Class Action suit, I agree with the proposed settlement BUT objects to the proposed Trustee payment.

\$ 70.000

Best regards

He Wen

发自我的iPhone

From: Anne-Marie Tan <annemarie.tan@gmail.com>  
 Sent: Monday, October 18, 2021 9:52 AM  
 To: Peter Doetsch <PDoetsch@jastram.com>  
 Subject: Fwd: Tan class action

Hi Peter,

Thank you for everything you have done for all of us. Yes, I do agree with you. I support the Settlement Administration plan, the retainer agreement, and the proposed legal expenses of the class action lawyers. Based on your email and Keen's email, I support your proposal to oppose the trustee's payment plan. I hope we can all find closure to this as soon as possible.

Sincerely,

\$1373.00

Anne-Marie

From: Da Cheng <info.djedu@gmail.com>  
 Sent: Monday, October 18, 2021 3:29 PM  
 To: Peter Doetsch <PDoetsch@jastram.com>  
 Subject: VIRGINIA TAN CLASS ACTION NOTICE -- Leah Ding

VIRGINIA TAN CLASS ACTION NOTICE

Thank you Peter for commencing this Class Action suit. I, Leah Ding, represents D&J Education Consulting agree with the proposed settlement BUT object to the proposed Trustee payment.

Best regards

Leah Ding

\$321.00

From: Da Cheng <info.djedu@gmail.com>  
 Date: Mon, Oct 18, 2021 at 12:42 PM  
 Subject: VIRGINIA TAN CLASS ACTION NOTICE  
 To: <peter.doetsch@gmail.com>

VIRGINIA TAN CLASS ACTION NOTICE

Thank you Peter for commencing this Class Action suit. I, XiaoChuan He, agree with the proposed settlement BUT object to the proposed Trustee payment.

Best regards

Chuan He Xiao

\$198.00





**From:** Dominic Qin <dominicq240@gmail.com>  
**Sent:** Monday, October 18, 2021 4:32 PM  
**To:** peter.doetsch@gmail.com  
**Subject:**

VIRGINIA TAN CLASS ACTION NOTICE

Thank you Peter for commencing this Class Action suit. I, Dominic Qin agree with the proposed settlement  
BUT object to the proposed Trustee payment.

\$86,300

Best regards  
Dominic Qin

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**From:** Glen Quan <gquan90@gmail.com>  
**Sent:** Monday, October 18, 2021 4:51 PM  
**To:** Peter Doetsch <PDoetsch@jastram.com>  
**Subject:** VIRGINIA TAN CLASS ACTION NOTICE

Hi Peter,

**VIRGINIA TAN CLASS ACTION NOTICE**

Thank you Peter for commencing this Class Action suit. I, Tyler Quan agree with the proposed settlement BUT object to the proposed Trustee payment.

Best regards

Tyler Quan

\$29,000



大成 DENTONS

This is Exhibit "C" as referred to in the affidavit of Peter Doetsch sworn before me at Vancouver, BC this 20th day of October, 2021

A Commissioner for taking Affidavits within British Columbia

Dentons Canada LLP  
20<sup>th</sup> Floor, 250 Howe Street  
Vancouver, BC, Canada V6C 3R8

T 604 687 4460  
F 604 683 5214

大成 Salans FMC SNR Denton McKenna Long  
dentons.com

Jastram Properties Ltd.  
135 West Riverside Drive  
North Vancouver BC V7H 1T6

Attention: Peter Doetsch  
President

INVOICE # 3216438

GST/HST # R121996078  
QST # 1086862448 TQ 0001

<u>Date</u>	<u>Matter Number</u>	<u>Lawyer</u>
July 1, 2016	566040-000001	Craig Dennis

Jastram Properties Ltd.  
Re: Virginia Mary Tan - Debt Collection

Professional Fees	\$ 6,346.00
Other Fees/Charges & Disbursements	2,448.72
GST (5.0%) on \$8,560.14	428.01
PST (7.0%) on \$6,391.50	447.41
<b>Total Amount Due</b>	<b>\$ 9,670.14 CAD</b>

DENTONS CANADA LLP

Per: \_\_\_\_\_

Craig P. Dennis, Q.C.

Payment Options:	
<b>Cheques:</b> Cheques payable to Dentons Canada LLP and mailed to the above noted address.	<b>Internet Banking:</b> Accepted at most financial institutions. Your payee is Dentons Canada LLP and your account number is 566040. Please email us at <a href="mailto:Edm.Accounting@dentons.com">Edm.Accounting@dentons.com</a> referencing invoice number and payment amount.
<b>Wire Transfer:</b> Bank of Montreal 10th Ave & Granville Branch, 2601 Granville St. Vancouver, BC V6H 3H2 Swift Code: BOMFCAM2 Bank ID: 001 Transit: 07600 CAD Funds Bank Account: 1138170	<b>Credit Card:</b> Payments are accepted via telephone, email or fax. We accept American Express, MasterCard or Visa (please circle one). Card No. <u>4500 0301 1696 7823</u> Expiry Date: <u>07/17</u> Amount: <u>9,670.14</u> Cardholder Name: <u>LALE DOETSCH</u> Signature: <u>[Signature]</u>
Please email us at <a href="mailto:Van.Accounting@dentons.com">Van.Accounting@dentons.com</a> referencing invoice number and payment amount. Payment due on receipt. Interest will be charged at the rate of 1.3% per annum on all outstanding amounts over 30 days.	

We are very grateful to have you as a client and appreciate your business.  
Please provide your feedback to us at [www.dentons.com/en/clientfeedbackcanada](http://www.dentons.com/en/clientfeedbackcanada)

[Signature]

DENTONS CANADA LLP  
Jastram Properties Ltd.  
Re: Virginia Mary Tan - Debt Collection

INVOICE 3216438  
Page 2 of 3  
Matter # 566040-000001

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**Invoice Detail**

TO PROFESSIONAL SERVICES RENDERED from March 16, 2016 to and including March 16, 2016:

Date	ID	Description of Work	Hours
16-Mar-16	OJ	Review Notice of Application and provide comments to Emma Irving regarding same. Strategy telephone call with Craig Dennis concerning application materials and next steps.	2.5
16-Mar-16	EI	Research and review case law regarding injunctions and document production orders. Consider and further draft Notice of Application. Consider and draft undertaking for Jastram Properties Ltd. Receive comments and instructions from Craig Dennis and Owen James. Consider and revise Affidavits of Rina Teo, Lale Doetsch and Notice of Application. Review and respond to emails from Daniel Yaverbaum regarding same.	12.3
16-Mar-16	CPD	Review and revise draft affidavits.	0.8
16-Mar-16	DY	Review and revise Notice of Application.	2.0
Total			17.6

Timekeeper	ID	Title	Hours	Rate	Fees
Craig Dennis	CPD	Partner	0.8	565.00	452.00
Daniel Yaverbaum	DY	Associate	2.0	380.00	760.00
Emma Irving	EI	Associate	12.3	330.00	4,059.00
Owen James	OJ	Partner	2.5	430.00	1,075.00
Total			17.6		\$6,346.00

**TOTAL PROFESSIONAL FEES**

\$ 6,346.00

**TAXABLE OTHER FEES/CHARGES**

BCO/LTSA service charge	\$ 45.50
Binding Books / Documents	24.65
Fax Charges	0.50
Long Distance Telephone Calls	0.27
Photocopy & Printing Charges	1,618.75
<b>TOTAL TAXABLE OTHER FEES/CHARGES</b>	<b>\$ 1,689.67</b>

**TAXABLE DISBURSEMENTS**

Agent Fees/Account	\$ 279.00
Courier & Delivery	201.72
Stationery & Supplies	43.75
<b>TOTAL TAXABLE DISBURSEMENTS</b>	<b>\$ 524.47</b>

**NON-TAXABLE DISBURSEMENTS**

Agency Registration*	\$ 111.58
BC Online Registration*	43.00



DENTONS CANADA LLP  
Jastram Properties Ltd.  
Re: Virginia Mary Tan - Debt Collection

INVOICE 3216438  
Page 3 of 3  
Matter # 566040-000001

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Court Fees*	80.00
<b>TOTAL NON-TAXABLE DISBURSEMENTS</b>	<b>\$ 234.58</b>
<b>TOTAL OTHER FEES/CHARGES AND DISBURSEMENTS</b>	<b><u>2,448.72</u></b>
<b>TOTAL FEES, OTHER FEES/CHARGES AND DISBURSEMENTS</b>	<b>\$ 8,794.72</b>
<b>TAXES</b>	
GST (5.0%) on Taxable Disbursements of \$2,214.14	\$ 110.71
GST (5.0%) on Professional Fees of \$6,346.00	317.30
PST (7.0%) on Professional Fees of \$6,346.00	444.22
PST (7.0%) on Taxable Disbursements of \$45.50	<u>3.19</u>
<b>TOTAL TAXES</b>	<b><u>875.42</u></b>
<b>TOTAL AMOUNT DUE</b>	<b><u>\$ 9,670.14 CAD</u></b>



大成 DENTONS

Dentons Canada LLP  
20<sup>th</sup> Floor, 250 Howe Street  
Vancouver, BC, Canada V6C 3R8

T 604 687 4460  
F 604 683 6214

大成 Salans FMC SNR Denton McKenna Long  
dentons.com

Jastram Properties Ltd.  
135 West Riverside Drive  
North Vancouver BC V7H 1T6

Attention: Peter Doetsch  
President

INVOICE # 3234649

GST/HST # R121996078  
QST # 1086862448 TQ 0001

Date  
September 30, 2016

Matter Number  
566040-000001


Lawyer  
Craig Dennis

Jastram Properties Ltd.  
Re: Virginia Mary Tan - Debt Collection

Professional Fees	\$ 7,095.00
Less: 20% Discount	(1,419.00)
Net Professional Fees	\$ 5,676.00
Other Fees/Charges	4.50
GST (5.0%) on \$5,680.50	284.03
PST (7.0%) on \$5,676.00	397.32
<b>Total Amount Due</b>	<b>\$ 6,361.85 CAD</b>

DENTONS CANADA LLP

Per:   
Craig P. Dennis, Q.C.

<b>Payment Options:</b>	<b>Internet Banking:</b>
<b>Cheques:</b> Cheques payable to Dentons Canada LLP and mailed to the above noted address.	Accepted at most financial institutions. Your payee is Dentons Canada LLP and your account number is 566040. Please email us at <a href="mailto:Edm.Accounting@dentons.com">Edm.Accounting@dentons.com</a> referencing invoice number and payment amount.
<b>Wire Transfer:</b> Bank of Montreal 10th Ave & Granville Branch, 2601 Granville St. Vancouver, BC V6H 3H2 Swift Code: BOMFCAM2 Bank ID: 001 Transit: 07600 CAD Funds Bank Account: 1138170	<b>Credit Card:</b> Payments are accepted via telephone, email or fax. We accept American Express, MasterCard or Visa (please circle one). Card No. <u>4500 0301 1696 7823</u> Expiry Date: <u>07/17</u> Amount: <u>6,361.85</u> Cardholder Name: <u>LALE DOETSCH</u> Signature: <u></u>
Please email us at <a href="mailto:Edm.Accounting@dentons.com">Edm.Accounting@dentons.com</a> referencing invoice number and payment amount. Payment due on receipt. Interest will be charged at the rate of 1.3% per annum on all outstanding amounts over 30 days.	

We are very grateful to have you as a client and appreciate your business.  
Please provide your feedback to us at [www.dentons.com/en/clientfeedbackcanada](http://www.dentons.com/en/clientfeedbackcanada)



Invoice Detail

TO PROFESSIONAL SERVICES RENDERED from April 15, 2016 to and including September 30, 2016:

Date	ID	Description of Work	Hours
18-Apr-16	DY	Email to client with respect to Response to Civil Claim. Telephone call to Chris Ramsay with respect to Mareva injunction. Telephone call to TD Trust with respect to Mareva injunction. Email to client with status update.	0.7
19-Apr-16	OJ	Correspondence with Defence counsel regarding Response to Civil Claim.	0.2
20-Apr-16	EI	Consider procedural options for amending style of cause. Draft email to Daniel Yaverbaum and Owen James regarding same.	0.2
20-Apr-16	CPD	Review responses to Notice of Civil Claim. Telephone call to B.C. Securities Commission (Stephen Zolnay).	0.4
20-Apr-16	DY	Email to opposing counsel enclosing Response to Civil Claim.	0.2
22-Apr-16	CPD	Telephone call from Stephen Zolnay at B.C. Securities Commission.	0.5
22-Apr-16	DY	Review of BCSEC decision. Email to co-defence counsel.	0.2
26-Apr-16	DY	Draft letter to John Whyte with respect to Toronto property. Telephone call from Lale Doetsch with respect to Toronto sale. Consider next steps for sale of property. Telephone call with Lale Doetsch to discuss next steps.	1.3
27-Apr-16	DY	Review of Mareva order. Respond to email of Craig Dennis with respect to same.	0.5
28-Apr-16	DY	Draft letter to Defendants with respect to sale of property. Telephone calls to counsel to Defendants with respect to sale of property. Multiple calls to client with respect to same. Emails to other Plaintiffs' counsel with respect to same. Telephone call to Chris Ramsay. Emails with respect to condo sale. Message to Chris Ramsay with respect to same.	4.2
02-May-16	DY	Telephone call with trustee with respect to next steps. Telephone call to client to discuss same.	0.3
05-May-16	DY	Email to Craig Dennis with status update.	0.2
06-May-16	CPD	Review trustee emails regarding Toronto sale.	0.2
06-May-16	DY	Discussion with Craig Dennis on sale of property. Email to client with respect to same. Telephone call from trustee with respect to sale of property. Email to Craig Dennis with respect to same.	0.5
13-May-16	CPD	Defence counsel call.	0.8
13-May-16	DY	Telephone call with all counsel to discuss next steps with respect to Marcus Tan. Telephone call with client to discuss same.	1.0
24-May-16	DY	Telephone call with trustee. Telephone call with Lale Doetsch to discuss next steps and appointment of Inspector. Message to John Whyte with respect to Mareva injunction.	0.8
25-May-16	CPD	Review letter from new counsel for Defendant companies and advice to	0.8





DENTONS CANADA LLP  
Jastram Properties Ltd.  
Re: Virginia Mary Tan - Debt Collection

INVOICE 3234649  
Page 3 of 3  
Matter # 566040-000001

Date	ID	Description of Work	Hours
		client regarding same.	
06-Jun-16	CPD	Telephone call from Vancouver Sun.	0.2
15-Jun-16	OJ	Review voice message from bankruptcy trustee. Reply to same.	0.2
06-Jul-16	DY	Telephone call from John Whyte to discuss Marcus Tan documents.	0.2
08-Jul-16	CPD	Review and respond to John Whyte correspondence.	0.1
21-Jul-16	CPD	Review and respond to John Whyte correspondence.	0.2
21-Jul-16	DY	Email to Craig Dennis with respect to demand for particulars.	0.2
28-Jul-16	DY	Consider case law on demand for particulars.	0.5
11-Aug-16	CPD	Email to Rina's lawyer regarding Rina's draft Response to Third Party Notice.	0.2
12-Aug-16	DY	Draft response letter to demand for particulars.	1.0
06-Sep-16	CPD	Review John Whyte correspondence and email to client regarding same.	0.3
08-Sep-16	CPD	Review and reply to client email.	0.4
13-Sep-16	CPD	Email to trustee's lawyer.	0.1
		<b>Total</b>	<b>16.6</b>

Timekeeper	ID	Title	Hours	Rate	Fees
Craig Dennis	CPD	Partner	4.2	565.00	2,373.00
Daniel Yaverbaum	DY	Associate	11.8	380.00	4,484.00
Emma Irving	EI	Associate	0.2	330.00	66.00
Owen James	OJ	Partner	0.4	430.00	172.00
<b>Total</b>			<b>16.6</b>		<b>\$7,095.00</b>

**TOTAL PROFESSIONAL FEES** \$ 7,095.00  
**Less: 20% Discount** (1,419.00)  
**NET PROFESSIONAL FEES** \$ 5,676.00

**TAXABLE OTHER FEES/CHARGES**  
 Photocopy & Printing Charges \$ 4.50  
**TOTAL OTHER FEES/CHARGES** 4.50

**TOTAL FEES AND OTHER FEES/CHARGES** \$ 5,680.50

**TAXES**  
 GST (5.0%) on Professional Fees of \$5,676.00 \$ 283.80  
 PST (7.0%) on Professional Fees of \$5,676.00 397.32  
 GST (5.0%) on Taxable Disbursements of \$4.50 0.23  
**TOTAL TAXES** 681.35

**TOTAL AMOUNT DUE** \$ 6,361.85 CAD

大成 DENTONS

Dentons Canada LLP  
20<sup>th</sup> Floor, 250 Howe Street  
Vancouver, BC, Canada V6C 3R8

T 604 887 4460  
F 604 883 5214

大成 Salans FMC SNR Denton McKenna Long  
dentons.com

Jastram Properties Ltd.  
135 West Riverside Drive  
North Vancouver BC V7H 1T6

Attention: Peter Doetsch  
President

INVOICE # 3262737

GST/HST # R121996078  
QST # 1086862448 TQ 0001

<u>Date</u>	<u>Matter Number</u>	<u>Lawyer</u>
January 31, 2017	566040-000001	Craig Dennis

Jastram Properties Ltd.  
Re: Virginia Mary Tan - Debt Collection

Professional Fees	\$	5,968.50
GST (5.0%) on \$5,968.50		298.43
PST (7.0%) on \$5,968.50		417.80
<b>Total Amount Due</b>	<b>\$</b>	<b>6,684.73 CAD</b>

DENTONS CANADA LLP

Per: 

Craig P. Dennis, Q.C.

Payment Options:	
<b>Cheques:</b> Cheques payable to Dentons Canada LLP and mailed to the above noted address.	<b>Internet Banking:</b> Accepted at most financial institutions. Your payee is Dentons Canada LLP and your account number is 566040. Please email us at <a href="mailto:Edm.Accounting@dentons.com">Edm.Accounting@dentons.com</a> referencing invoice number and payment amount.
<b>Wire Transfer:</b> Bank of Montreal 10th Ave & Granville Branch, 2601 Granville St. Vancouver, BC V6H 3H2 Swift Code: BOMFCAM2 Bank ID: 001 Transit: 07600 CAD Funds Bank Account: 1138170	<b>Credit Card:</b> Payments are accepted via telephone, email or fax. We accept American Express, MasterCard or Visa (please circle one). Card No. _____ Expiry Date: _____ Amount: _____ Cardholder Name: _____ Signature: _____

Please email us at [Van.Accounting@dentons.com](mailto:Van.Accounting@dentons.com) referencing invoice number and payment amount.  
 Payment due on receipt. Interest will be charged at the rate of 1.3% per annum on all outstanding amounts over 30 days.

*We are very grateful to have you as a client and appreciate your business.  
 Please provide your feedback to us at [www.dentons.com/en/clientfeedbackcanada](http://www.dentons.com/en/clientfeedbackcanada)*



DENTONS CANADA LLP  
 Jastram Properties Ltd.  
 Re: Virginia Mary Tan - Debt Collection

INVOICE 3262737  
 Page 2 of 3  
 Matter # 566040-000001

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**Invoice Detail**

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TO PROFESSIONAL SERVICES RENDERED in connection with the above noted matter:

Date	ID	Description of Work	Hours
17-Mar-16	CPD	Revise and finalize application materials. Prepare for application.	0.5
17-Mar-16	DY	Email to client with respect to status.	0.3
18-Mar-16	CPD	Prepare for application. Telephone call with John Whyte. Email to Michael Hewitt.	2.0
18-Mar-16	DY	Review authorities. Coordinate Book of Authorities.	0.9
21-Mar-16	DY	Telephone calls with Lale Doetsch with respect to interim order. Discussion with Owen James with respect to same.	0.7
22-Mar-16	DY	Emails with respect to service of interim order. Email to client with status update.	0.2
23-Mar-16	CPD	Prepare for and attend Defence counsel strategy call.	0.8
23-Mar-16	DY	Email update to client on current status.	0.2
24-Mar-16	DY	Review of email from client. Review of interim order. Emails to Craig Dennis and Michael Hewitt with respect to same.	0.7
29-Mar-16	DY	Review and revise asset list. Email with client with respect to same. Telephone call with client to discuss same.	1.6
30-Mar-16	DY	Telephone call with Lale Doetsch to discuss next steps. Telephone call with Michael Hewitt to discuss next steps. Message to counsel for Northern Peace Savings & Credit Union with respect to freezing order. Review of affidavits and instructions to assistant to prepare letters serving same.	0.6
31-Mar-16	DY	Draft letters to banks with respect to freezing of further accounts.	0.4
04-Apr-16	DY	Review of pleadings provided by counsel to persons asserting Certificate of Pending Litigation on Surrey Lands. Telephone call with opposing counsel to discuss next steps.	0.8
07-Apr-16	DY	Meeting with trustee to discuss potential bankruptcy.	1.6
08-Apr-16	DY	Telephone call with update to client.	0.4
12-Apr-16	DY	Review of draft order. Telephone call with Lale Doetsch. Review of other claims against Virginia Tan.	1.1
13-Apr-16	DY	Review emails from Michael Hewitt with respect to bankruptcy.	0.3
14-Apr-16	DY	Email with opposing counsel with respect to filed affidavits.	0.1
14-Oct-16	DY	Telephone calls with Christopher Ramsay with respect to discharge of Certificate of Pending Litigation. Email to Christopher Ramsay with respect to same. Email to client with respect to same.	0.9
<b>Total</b>			<b>14.1</b>



DENTONS CANADA LLP  
Jastram Properties Ltd.  
Re: Virginia Mary Tan - Debt Collection

INVOICE 3262737  
Page 3 of 3  
Matter # 566040-000001

Timekeeper	ID	Title	Hours	Rate	Fees
Craig Dennis	CPD	Partner	3.3	565.00	1,864.50
Daniel Yaverbaum	DY	Associate	10.8	380.00	4,104.00
Total			14.1		\$5,968.50

**TOTAL PROFESSIONAL FEES**

\$ 5,968.50

**TAXES**

GST (5.0%) on Professional Fees of \$5,968.50

\$ 298.43

PST (7.0%) on Professional Fees of \$5,968.50

417.80

**TOTAL TAXES**716.23**TOTAL AMOUNT DUE**\$ 6,684.73 CAD

Invoice Detail

TO PROFESSIONAL SERVICES RENDERED from April 15, 2016 to and including September 30, 2016:

Date	ID	Description of Work	Hours
18-Apr-16	DY	Email to client with respect to Response to Civil Claim. Telephone call to Chris Ramsay with respect to Mareva Injunction. Telephone call to TD Trust with respect to Mareva Injunction. Email to client with status update.	0.7
19-Apr-16	OJ	Correspondence with Defence counsel regarding Response to Civil Claim.	0.2
20-Apr-16	EI	Consider procedural options for amending style of cause. Draft email to Daniel Yaverbaum and Owen James regarding same.	0.2
20-Apr-16	CPD	Review responses to Notice of Civil Claim. Telephone call to B.C. Securities Commission (Stephen Zolnay).	0.4
20-Apr-16	DY	Email to opposing counsel enclosing Response to Civil Claim.	0.2
22-Apr-16	CPD	Telephone call from Stephen Zolnay at B.C. Securities Commission.	0.5
22-Apr-16	DY	Review of BCSEC decision. Email to co-defence counsel.	0.2
26-Apr-16	DY	Draft letter to John Whyte with respect to Toronto property. Telephone call from Lale Doetsch with respect to Toronto sale. Consider next steps for sale of property. Telephone call with Lale Doetsch to discuss next steps.	1.3
27-Apr-16	DY	Review of Mareva order. Respond to email of Craig Dennis with respect to same.	0.5
28-Apr-16	DY	Draft letter to Defendants with respect to sale of property. Telephone calls to counsel to Defendants with respect to sale of property. Multiple calls to client with respect to same. Emails to other Plaintiffs' counsel with respect to same. Telephone call to Chris Ramsay. Emails with respect to condo sale. Message to Chris Ramsay with respect to same.	4.2
02-May-16	DY	Telephone call with trustee with respect to next steps. Telephone call to client to discuss same.	0.3
05-May-16	DY	Email to Craig Dennis with status update.	0.2
06-May-16	CPD	Review trustee emails regarding Toronto sale.	0.2
06-May-16	DY	Discussion with Craig Dennis on sale of property. Email to client with respect to same. Telephone call from trustee with respect to sale of property. Email to Craig Dennis with respect to same.	0.5
13-May-16	CPD	Defence counsel call.	0.8
13-May-16	DY	Telephone call with all counsel to discuss next steps with respect to Marcus Tan. Telephone call with client to discuss same.	1.0
24-May-16	DY	Telephone call with trustee. Telephone call with Lale Doetsch to discuss next steps and appointment of Inspector. Message to John Whyte with respect to Mareva Injunction.	0.8
25-May-16	CPD	Review letter from new counsel for Defendant companies and advice to	0.8



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Dentons Canada LLP  
20<sup>th</sup> Floor, 250 Howe Street  
Vancouver, BC, Canada V6C 3R8

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F 604 683 8214

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dentons.com

Jastram Properties Ltd.  
135 West Riverside Drive  
North Vancouver BC V7H 1T6

Attention: Peter Doetsch  
President

**INVOICE # 3308235**

GST/HST # R121996078  
QST # 1086862448 TQ 0001

<u>Date</u>	<u>Matter Number</u>	<u>Lawyer</u>
September 30, 2017	566040-000001	Craig Dennis

**Jastram Properties Ltd.**  
**Re: Virginia Mary Tan - Debt Collection**

Professional Fees	\$ 16,084.00
Less: Discount	<u>(5,307.72)</u>
Net Professional Fees	\$ 10,776.28
Other Fees/Charges & Disbursements	1,506.12
GST (5.0%) on \$11,956.59	597.83
PST (7.0%) on \$10,867.28	<u>760.71</u>
<b>Total Amount Due</b>	<b><u>\$ 13,640.94 CAD</u></b>

DENTONS CANADA LLP

Per: \_\_\_\_\_

Craig P. Dennis, Q.C.



DENTONS CANADA LLP  
Jastram Properties Ltd.  
Re: Virginia Mary Tan - Debt Collection

INVOICE 3308235  
Page 2 of 7  
Matter # 566040-000001

**Payment Options:****Cheques:**

Cheques payable to Dentons Canada LLP  
and mailed to the following address:  
77 King Street West, Suite 400  
Toronto-Dominion Centre  
Toronto, ON Canada M5K 0A1

**Wire Transfer:**

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1st Canadian Place, Toronto, ON  
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**Internet Banking:**

Accepted at most financial institutions. Your payee is Dentons Canada LLP and your account number is 566040. Please email us at [Edm.Accounting@dentons.com](mailto:Edm.Accounting@dentons.com) referencing invoice number and payment amount.

**Credit Card:**

Payments are accepted via telephone, email or fax. We accept American Express, MasterCard or Visa (please circle one).

Card No. \_\_\_\_\_

Expiry Date: \_\_\_\_\_ Amount: \_\_\_\_\_

Cardholder Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Please email us at [Tor.Accounting@dentons.com](mailto:Tor.Accounting@dentons.com) referencing invoice number and payment amount.

Payment due on receipt. Interest will be charged at the rate of 1.5% per annum on all outstanding amounts over 30 days.

*We are very grateful to have you as a client and appreciate your business.  
Please provide your feedback to us at [www.dentons.com/en/clientfeedbackcanada](http://www.dentons.com/en/clientfeedbackcanada)*



DENTONS CANADA LLP  
 Jastram Properties Ltd.  
 Re: Virginia Mary Tan - Debt Collection

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 Page 3 of 7  
 Matter # 566040-000001

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**Invoice Detail**

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TO PROFESSIONAL SERVICES RENDERED in connection with the above noted matter:

Date	ID	Description of Work	Hours
13-Oct-16	CPD	Email to Michael Hewitt regarding Case Planning Conference.	0.4
17-Oct-16	DY	Draft letter to Land Title Office discharging Certificate of Pending Litigation.	0.3
24-Oct-16	DY	Consider evidence required to support delivery of meeting materials. Review and revise consent order for amendment of pleadings and Case Planning Conference.	1.2
27-Oct-16	DY	Email to Lale Doetsch with respect to foreclosure proceedings. Review of foreclosure documents.	0.2
28-Oct-16	DY	Draft letter to foreclosure lawyers requesting documents be sent to our office.	0.1
03-Nov-16	DY	Telephone calls to counsel with respect to Case Planning Conference. Message to counsel to trustee.	0.3
03-Nov-16	DY	Email to Mike Hewitt with respect to Case Planning Conference. Email to Lale Doetsch with status update.	0.2
04-Nov-16	DY	Telephone call with Mike Hewitt to discuss Case Planning Conference. Letter with respect to same.	0.3
09-Nov-16	DY	Telephone call with counsel to the trustee.	0.1
16-Nov-16	DY	Emails to counsel to receiver and receiver. Telephone call with respect to same. Telephone call with client to discuss next steps.	1.1
30-Nov-16	DY	Respond to equestions from Lale Doetsch. File petition response. Review Injunction CPL and other CPLs. Email to trustee with respect to rent from Tan properties.	2.2
01-Dec-16	DY	Email to client with respect to client questions on mortgage. Message from Trustee on rental properties. Message from Trustee on rental properties.	0.3
05-Dec-16	DY	Review service letter for Petition Response.	0.1
08-Dec-16	DY	Telephone call with Christopher Ramsay with respect to application to release funds. Email to client with respect to same.	0.2
15-Dec-16	DY	Telephone call to John Whyte with respect to amended Injunction order at request of the trustee. Respond to questions on various matters from Lale Doetsch. Provide update on status of case planning conference.	1.3
19-Dec-16	DY	Draft revised order to permit trustee to sell the lands.	0.6
20-Dec-16	VC	Review underlying action; notice of application; emails and consent order. Review materials on short leave applications. Prepare speaking notes for application for short leave.	4.0
20-Dec-16	DY	Draft Notice of Application to vary terms of Injunction at request of trustee.	1.0



DENTONS CANADA LLP  
Jastram Properties Ltd.  
Re: Virginia Mary Tan - Debt Collection

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Matter # 566040-000001

Date	ID	Description of Work	Hours
21-Dec-16	VC	Prepare application record and requisitions for short leave. Prepare for chambers short leave application. Attend chambers and speak to short leave application. Notify other parties of short-leave, and serve application record and other materials on other parties. Prepare speaking notes for application to vary order.	7.1
22-Dec-16	VC	Prepare materials for chambers. Attend chambers to speak to application to vary order of Madam Justice Adair. Organize consent order and new draft order made after application. Enter certified order. Deliver order to Clark Wilson. Notify parties of entered, certified order.	6.1
16-Jan-17	DY	Email to Mike Hewitt. Email to client with respect to same.	0.2
17-Jan-17	DY	Email to Mike Hewitt with respect to status of application. Email to Lale Doetsch with respect to CPC of Mike Hewitt.	0.2
25-Jan-17	CPD	Review Michael Hewitt letter.	0.1
25-Jan-17	DY	Telephone call with John McKewan with respect to settlement with securities commission. Email with trustee with respect to accounts frozen per mareva injunction.	0.4
27-Jan-17	DY	Review email from Mike Hewitt with respect to sale of TLD properties.	0.1
30-Jan-17	DY	Email to assistant to Mr. Hewitt with respect to application for consolidation. Email to client with respect to same.	0.1
01-Feb-17	DY	Telephone call with Mike Hewitt and Trustee with respect to sale of Fort St. John properties.	0.8
02-Feb-17	DY	Review of application materials for sale of Fort St. John properties. Email to Lale Doetsch with respect to same.	0.5
06-Feb-17	DY	Draft letter to Gregory Gehlen regarding legal fees. Email to Lale Doetsch with respect to same.	0.3
07-Feb-17	DY	Message to Michael Hewitt with respect to foreclosure. Review of email from Michael Hewitt. Review email from Gregory Gehlen with respect to foreclosure. Email to Gregory Gehlen with respect to foreclosure application. Email to Michael Hewitt with respect to foreclosure proceedings. Email to Lale Doetsch with respect to consolidation hearing.	0.8
08-Feb-17	DY	Telephone call with Mike Hewitt and Greg Gehlen to discuss fees. Emails with Mike Hewitt with respect to same. Email	1.3
09-Feb-17	DY	Email to Lale Doetsch with respect to legal fees in foreclosure.	0.3
24-Feb-17	DY	Telephone call with counsel to Lau Hsien Keen and Lau Hsien Lee with respect to Canadian Western Bank Foreclosures. Instructions to assistant with respect to same.	0.1
28-Feb-17	CPD	Status update with Mike Hewitt.	0.4
06-Mar-17	DY	Review of materials for consolidation.	0.1
07-Mar-17	CPD	Review Singleton letter and email to client.	0.4
10-Mar-17	DY	Draft three petition response to foreclosure proceedings by Canadian Western Bank.	0.4
13-Mar-17	WS	Review the pleadings in the action and the application of RSC Enterprise Canada Inc. to appoint a common case management judge	2.7

DENTONS CANADA LLP  
Jastram Properties Ltd.  
Re: Virginia Mary Tan - Debt Collection

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INVOICE 3308235  
Page 5 of 7  
Matter.# S66040-000001

Date	ID	Description of Work	Hours
		In preparation of drafting an application response. Draft the application response consenting to RSC Enterprise Canada Inc.'s application.	
14-Mar-17	WS	Finalize the application response consenting to RSC Enterprise Canada Inc.'s application.	0.3
15-Mar-17	WS	Finalize the application response consenting to RSC Enterprise Canada Inc.'s application	0.9
19-Mar-17	DY	Draft Application Response to coordination application.	0.9
22-Mar-17	DY	Further email to Michael Hewitt with respect to foreclosure proceedings. Email to counsel to Lau's with respect to filing of Application Response.	0.3
23-Mar-17	DY	Prepare for application for consolidated case management. Email with lawyer for Lau's with respect to materials for hearing.	1.1
24-Mar-17	DY	Prepare for and attend application for consolidated case management.	4.5
11-Apr-17	DY	Telephone call with counsel to the trustee with respect to release of freezing order by securities commission. Discussion of current status of bankruptcy.	0.2
01-May-17	CPD	Review Mike Hewitt email on status and next steps regarding Tan.	0.3
18-Jul-17	DY	Review and file petition responses to foreclosure proceedings. Review applications commenced in foreclosure proceedings. Email to Craig Dennis with respect to status of Marcus Tan litigation.	0.3
24-Jul-17	DY	Email to Craig Dennis with respect to date for application for demand for particulars.	0.2
04-Aug-17	DY	Telephone call with Michael Hewitt to discuss demand for particulars and next steps. Email to Lale Doetsch scheduling call to discuss current status. Draft letter to John Whyte with respect to demand for particulars.	0.6
10-Aug-17	DY	Email to Lale Doetsch with respect to judicial management conference.	0.1
05-Sep-17	DY	Email to client with agenda for Judicial Management Conference.	0.2
07-Sep-17	DY	Attend Case Planning Conference.	1.5
19-Sep-17	DY	Email to Lale Doetsch with respect to memorandum from court and steps against Marcus Tan.	0.4
22-Sep-17	DY	Review of Notice of Hearing. Email to client with respect to same.	0.1
		Total	48.2



DENTONS CANADA LLP  
 Jastram Properties Ltd.  
 Re: Virginia Mary Tan - Debt Collection

INVOICE 3308235  
 Page 6 of 7  
 Matter # 566040-000001

Timekeeper	ID	Title	Hours	Rate	Fees
Craig Dennis	CPD	Partner	1.2	595.00	714.00
Craig Dennis	CPD	Partner	0.4	565.00	226.00
Daniel Yaverbaum	DY	Associate	16.0	420.00	6,720.00
Daniel Yaverbaum	DY	Associate	9.5	380.00	3,610.00
Valerie Cross	VC	Associate	17.2	230.00	3,956.00
William Stransky	WS	Associate	3.9	220.00	858.00
<b>Total</b>			<b>48.2</b>		<b>\$16,084.00</b>

**TOTAL PROFESSIONAL FEES** \$ 16,084.00  
**Less: Discount** (5,307.72)  
**NET PROFESSIONAL FEES** \$ 10,776.28

**TAXABLE OTHER FEES/CHARGES**

BCO/LTSA service charge \$ 91.00  
 Binding Books / Documents 17.50  
 Document Scanning 95.10  
 Fax Charges 14.00  
 Library Computer Research 156.00  
 Photocopy & Printing Charges 616.75  
**TOTAL TAXABLE OTHER FEES/CHARGES** \$ 990.35

**TAXABLE DISBURSEMENTS**

Transportation Costs \$ 6.33  
 Agent Fees/Account 132.50  
 Courier & Delivery 35.30  
 Postage 8.33  
 Stationery & Supplies 7.50  
**TOTAL TAXABLE DISBURSEMENTS** \$ 189.96

**NON-TAXABLE DISBURSEMENTS**

B.C. LTSA search\* \$ 100.23  
 Agency Registration\* 154.58  
 BC Online Registration\* 31.00  
 Court Fees\* 40.00  
**TOTAL NON-TAXABLE DISBURSEMENTS** \$ 325.81

**TOTAL OTHER FEES/CHARGES AND DISBURSEMENTS** 1,506.12

**TOTAL FEES, OTHER FEES/CHARGES AND DISBURSEMENTS** \$ 12,282.40

**TAXES**

GST (5.0%) on Taxable Disbursements of \$1,180.31 \$ 59.02  
 GST (5.0%) on Professional Fees of \$10,776.28 538.81  
 PST (7.0%) on Professional Fees of \$10,776.28 754.34  
 PST (7.0%) on Taxable Disbursements of \$91.00 6.37  
**TOTAL TAXES** 1,358.54



DENTONS CANADA LLP  
Jastram Properties Ltd.  
Re: Virginia Mary Tan - Debt Collection

INVOICE 3308235  
Page 7 of 7  
Matter # 566040-000001

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**TOTAL AMOUNT DUE**

**\$ 13,640.94 CAD**

