



This is the 1st affidavit
of Gurpreet Uppal in this case
and it was made on 18 February 2025

No. VLC-S-S-248901
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

MICHAEL LARES

PETITIONER

AND:

PETER VAN DER HEYDEN and FLYING "L" RANCH LTD.

RESPONDENTS

AFFIDAVIT

I, Gurpreet Uppal, legal assistant at Eyford Partners LLP, 1744-1055 Dunsmuir Street, Vancouver, British Columbia, AFFIRM THAT:

1. I am a legal assistant at Eyford Partners LLP, counsel for the respondent, Peter van der Heyden, in this petition and as such, have personal knowledge of the facts deposed to in this affidavit, unless such facts are said to be based on information, in which case I state so and believe the information to be true to the best of my knowledge.
2. Attached to this affidavit and marked as exhibit "A" is a true copy of a printout of the website of Flying "L" Ranch Ltd. (the "Company").
3. Attached to this affidavit and marked as exhibit "B" is a true copy of a screenshot of the "support" page on the Company's website. This webpage is accessible through clicking on the "support" link on exhibit "A".
4. Attached to this affidavit and marked as exhibit "C" is a true copy of a screenshot of the Instagram account "michael_lares" (the "Instagram Account").

5. Attached to this affidavit and marked as exhibit "D" is a true copy of a screenshot of a post on the Instagram Account on 16 February 2024.
6. Attached to this affidavit and marked as exhibit "E" is a true copy of a screenshot of the Company's page on Patreon dated 16 January 2022.
7. Attached to this affidavit and marked as exhibit "F" is a true copy of a screenshot of a post on the Instagram Account dated 18 June 2022.
8. Attached to this affidavit and marked as exhibit "G" is a true copy of a screenshot of a post on the Instagram Account dated 19 July 2022.
9. Attached to this affidavit and marked as exhibit "H" is a true copy of a screenshot of a post on the Instagram Account dated 21 December 2022.
10. Attached to this affidavit and marked as exhibit "I" is a true copy of a screenshot of a post on the Instagram Account dated 15 March 2023.
11. Attached to this affidavit and marked as exhibit "J" is a true copy of a screenshot of a GoFundMe fundraiser titled "Weiser Strong Fund Phase 1 Tack Shed With Wing".
12. Attached to this affidavit and marked as exhibit "K" is a true copy of a screenshot of three stories posted on the Instagram Account on 12 and 13 July 2023.
13. Attached to this affidavit and marked as exhibit "L" is a true copy of a screenshot of a PayPal link asking for donations to provide vet care to a horse named Second Chances.
14. Attached to this affidavit and marked as exhibit "M" is a true copy of a screenshot of a post on the Instagram Account dated 05 May 2024.
15. Attached to this affidavit and marked as exhibit "N" is a true copy of a screenshot of a post on the Instagram Account dated 10 June 2024.
16. Attached to this affidavit and marked as exhibit "O" is a true copy of a screenshot of a post on the Instagram Account dated 14 June 2024.
17. Attached to this affidavit and marked as exhibit "P" is a true copy of a screenshot of a post on the Instagram Account story dated 17 July 2024.

