



This is the 1st affidavit  
of Michelle EI in this case  
and it was made on 06 May 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**

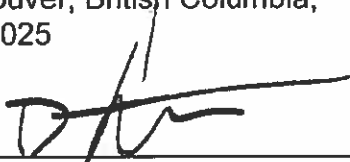
**AFFIDAVIT**

I, Michelle EI, 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 my affidavit and marked as Exhibit "A" is a true copy of an email from "Meta Support" to Melissa Blackwell, Michael Lares, Benjamin Morley, Barbara Poth, and "Dropbox" dated 26 February 2024 at 10:14am.
3. Attached to this my affidavit and marked as Exhibit "B" is a true copy of an email from Michael Lares to "Meta Support" (with copies to Melissa Blackwell, Benjamin Morley, Barbara Poth, and "Dropbox") dated 26 February 2024 at 10:28am.

4. Attached to this my affidavit and marked as Exhibit "C" is a true copy of an email from "Meta Support" to Michael Lares (with copies to Melissa Blackwell, Benjamin Morley, Barbara Poth, and "Dropbox") dated 28 February 2024 at 9:27am.
5. Attached to this my affidavit and marked as Exhibit "D" is a true copy of a letter from Royal Morton to Drummond Lambert dated 19 February 2025.
6. Attached to this my affidavit and marked as Exhibit "E" is a true copy of a letter from Mr. Lambert to Mr. Morton dated 18 March 2025.
7. Attached to this my affidavit and marked as Exhibit "F" is a true copy of a letter from Mr. Morton to Mr. Lambert dated 24 March 2025.
8. Attached to this my affidavit and marked as Exhibit "G" is a true copy of an email from Mr. Lambert to Cole Rodocker dated 11 April 2025.
9. Attached to this my affidavit and marked as Exhibit "H" is a true copy of a letter from Mr. Lambert to Mr. Morton dated 14 April 2025.
10. Attached to this my affidavit and marked as Exhibit "I" is a true copy of a letter from Benjamin Morley to Mr. Lambert dated 17 April 2025.
11. Attached to this my affidavit and marked as Exhibit "J" is a true copy of an email from Mr. Lambert to Corry Clark dated 30 April 2025.
12. Attached to this my affidavit and marked as Exhibit "K" is a true copy of an email from Mr. Lambert to Ms. Clark dated 30 April 2025.

AFFIRMED BEFORE  
ME at Vancouver, British Columbia,  
on 06 May 2025



\_\_\_\_\_  
A commissioner for taking affidavits  
for British Columbia



\_\_\_\_\_  
Michelle El

**Drummond Lambert**  
Barrister and Solicitor  
Eyford Partners LLP  
: 744-1055 Dunsmuir Street, PO Box 49254  
Vancouver, BC V7X 1L2  
604-899-5205

From: Meta Support  
To: Melissa Blackwell; Michael Lares; Christine Bechman; Marissa (Sarah) Park  
Subject: I want to report an instance of bullying | Case: 76066409279713  
Date: Monday, February 26, 2024 10:14:15 AM

You don't often get email from case+aaazqkqrqv6aox@support.facebook.com. Learn why this is important  
CAUTION: This email originated from outside the firm. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Michael,

We recognize the importance of getting this resolved as soon as possible and we're happy to check into this!

Thanks for bringing this to our attention and helping keep the Instagram community safe. We removed some of the content you reported from Instagram because it went against our Community Guidelines.

Just to set an expectation, it may take some time before the changes take in effect and reflect. Rest assured; our Dedicated Team confirms that the reported Contents are already taken down. We kindly advise to check it from time to time.

We hope the above information clarifies. You may receive a quick automated survey shortly. Since we have provided all information regarding this matter and there is no further action for us to take, we will be closing this case. We are always looking for ways to improve our service.

Thank you for contacting Meta Pro Team. Have a nice day ahead.

Beda  
Meta Pro Team

>On Sun Feb 25, 2024 07:00:09, Michael Lares wrote:  
>I have responded with several emails and two of the inquiring if the format in which I submitted information was acceptable.  
>Can you please review said emails and let me know if it is indeed acceptable so I can send a significant amount more evidence?  
>Regards,  
>Michael D. Lares  
>Flying "L" Ranch LTD.  
>Box 10, Nemiah Valley  
>British Columbia, Canada  
>V0L 1X0  
>Email michael@flyingranch.ca <mailto:michael@flyingranch.ca>  
>IG michael\_lares <https://www.instagram.com/michael\_lares/>  
>Web flyingranch.ca <http://www.flyingranch.ca/>  
>YouTube Flying L Ranch <https://www.youtube.com/channel/UCFuw1o1zk6hJ38xe2mjrzgA>  
>Ranch 250-394-7066  
>Cell 250-302-2989  
>Fax 805-283-8372  
>On Feb 21, 2024, at 7:18 AM, Meta Support <case+aaazqkqrqv6aox@support.facebook.com> wrote:  
>Hi Michael,  
>Thanks for getting back to us and we are sending this email about your report for inappropriate contents with the Case ID: 76066409279713.  
>We appreciate all of the screenshots and information you have provided on this case. As of the moment, we have followed up your concern to our specialized team for further investigation and please be assured that they are still looking into this case to resolve this at the soonest possible time.  
>You may also ask how long this may take and we would like to set proper expectations that the review process may depend on the complexity of the issue being investigated.  
>The good thing here is that we will get in touch with you as soon as the review has been completed or if any additional information is required. We ask for your continuous patience and understanding with this process.  
>Thank you for contacting Meta Pro Team. Have a great day.  
>Thanks,  
>Erol

This is Exhibit " A " referred to in the Affidavit of Michelle El sworn (or affirmed) before me at Vancouver, B.C. this 06 day of May, 2025.  
DL  
A Commissioner for Taking Affidavits within British Columbia

>Meta Pro Team

>>On Wed Feb 21, 2024 08:39:36, Michael Lares wrote:

>>Another Instagram account dedicated solely to defaming me in which suspect @oh\_alisse participated in slander against me the week of Feb 12th. This page has been up for several months now. Please see attached.Regards,Michael D. LarasFlying "L" RanchBox 10, Nemiah ValleyBritish Columbia, Canada V0L 1X0Email michael@flyingranch.caWeb flyingranch.caRanch 250-394-7066Cell 250-302-2989Fax 805-283-8372On Feb 18, 2024, at 9:05 AM, Michael Laras <michael@flyingranch.ca> wrote:Meta,Please find attached one of the several offenders slandering and bullying me with malicious statements and lies. I don't even know this person.Offender @oh\_alisseDate Tuesday February 13, 2024Posted on her stories the following bullying and slanderous statements about me. As well as DM'ing me with slandering statements.Is this format acceptable as I have several other parties that have committed similar offences against me.

>>Regards,Michael D. LarasFlying "L" Ranch LTD.Box 10, Nemiah ValleyBritish Columbia, Canada V0L 1X0Email michael@flyingranch.caIG michael\_laresWeb flyingranch.caYouTube Flying L Ranch Ranch 250-394-7066Cell 250-302-2989Fax 805-283-8372

>>On Feb 19, 2024, at 7:53 PM, Meta Support <case++aazqfkrqv6eox@support.facebook.com> wrote: Hi Michael,We appreciate your response.For us to be able to proceed with the investigation, kindly send us the following:- Link of the content where the abusive comments can be found- Screenshot of some of the comments that you want us to review (preferably the most relevant ones)Please note that we cannot open or view files that are saved in external links or drives. We can only view files that are in JPEG or MP4 format.We anticipate your response, so we can sort this out as soon as we can. Please be advised that cases will be closed if they have gone for more than 48 hours without a response.Thank you for contacting Meta Pro Team.Warmest regards,ishMeta Pro Team >On Fri Feb 16, 2024 18:42:46, Michael Laras wrote:

>>Hello Tine,

>>I am not exactly sure what your request is about with reference to "provide the effected user for the link of the abusive content". >>I believe you may be referring to the evidence files I have on DropBox so I have included them below. Please advise if you were requesting something different.

>>The below individuals have been collectively conspiring against me in a very public defaming campaign on their Instagram lives, posts and other various content mediums. This began back in November of 2023. In the below files are many screenshot and screen recordings of the fictitious and blatant lies and accusations as they try to create conversation to defame me with other followers. I have retained legal representation and we are preparing a civil conspiracy case against all of the following:

>>Devyn McMillan - @thedevyndestinee <https://www.dropbox.com/scl/fo4o84j0baqmibf0g28wy8a/h?rlkey=18m7ca2bbfduscsjpy8957y8s&dl=0>https://www.dropbox.com/scl/fo4o84j0baqmibf0g28wy8a/h?rlkey=18m7ca2bbfduscsjpy8957y8s&dl=0

>>Alisse Andrews - @Oh\_Alisse <https://www.dropbox.com/scl/fo8k28cl8i8y8i0n8i217i0/h?rlkey=mi0v1cq00brdgrbjzv1k1xoz1&dl=0>https://www.dropbox.com/scl/fo8k28cl8i8y8i0n8i217i0/h?rlkey=mi0v1cq00brdgrbjzv1k1xoz1&dl=0

>>Janalith Skeels - @Johnyvaca and @vacilandos <https://www.dropbox.com/scl/fo8dwm13hca0twwv71fvjn/h?rlkey=65mwv78c3y8dugibu37ey3ki&dl=0>https://www.dropbox.com/scl/fo8dwm13hca0twwv71fvjn/h?rlkey=65mwv78c3y8dugibu37ey3ki&dl=0

>>Daven M. Lamar (ORourke) - @lamardaven <https://www.dropbox.com/scl/fozupfpwb7rx11tyynsm0n2/h?rlkey=bnfu7pd1jy227c8wby1vgjvs3&dl=0>https://www.dropbox.com/scl/fozupfpwb7rx11tyynsm0n2/h?rlkey=bnfu7pd1jy227c8wby1vgjvs3&dl=0

>>Andres Prescott - @Cooper.Whisper <https://www.dropbox.com/scl/fo4w8p8ep7i8omf17d3af48/h?rlkey=8c0rbhjxun8pnf2ig22m808b&dl=0>https://www.dropbox.com/scl/fo4w8p8ep7i8omf17d3af48/h?rlkey=8c0rbhjxun8pnf2ig22m808b&dl=0

>>Kristy McQuade - @kristymcquade <https://www.dropbox.com/scl/fo4w8p8ep7i8omf17d3af48/h?rlkey=kpe78yrgl3zguu4n01khtce&dl=0>https://www.dropbox.com/scl/fo4w8p8ep7i8omf17d3af48/h?rlkey=kpe78yrgl3zguu4n01khtce&dl=0

>>Elise Reculard - @elise\_recc <https://www.dropbox.com/scl/fo4w8p8ep7i8omf17d3af48/h?rlkey=m3w7ytov8hoy2fm2307dguip6&dl=0>https://www.dropbox.com/scl/fo4w8p8ep7i8omf17d3af48/h?rlkey=m3w7ytov8hoy2fm2307dguip6&dl=0

>>There were multiple other accounts defaming me and joining in on the Instagram accounts of the above. Screenshots of those comments have been submitted in the original chat but I did not build individual files on them.

>>Please let me know if there is any further required information or if I misunderstood your request.

>>Regards,

>>Michael D. Laras

>>Flying "L" Ranch LTD.

>>Box 10, Nemiah Valley

>>British Columbia, Canada

>>V0L 1X0

>>Email michael@flyingranch.ca <mailto:michael@flyingranch.ca>

>>IG michael\_lares <<https://www.instagram.com/michael\_lares/>https://www.instagram.com/michael\_lares/>

>>Web flyingranch.ca <<http://www.flyingranch.ca/>http://www.flyingranch.ca/>

>>YouTube Flying L Ranch <

<https://www.youtube.com/channel/UJCFuwl01zk6hJ38ra2mjzga>https://www.youtube.com/channel/UJCFuwl01zk6hJ38ra2mjzga>

>>Ranch 260-394-7088

>>Cell 260-302-2888

>>Fax 805-283-8372

>>On Feb 16, 2024, at 7:43 AM, Meta Support <case++sazqfkrqv6sox@support.facebook.com> wrote:

>>Hi Michael,

>>Appreciate your patience on this concern.

>>We would like to let you know that your case has been reviewed by our dedicated team in detail earlier.

>>Would you be so kind to provide the affected user for the link of the abusive content for us to be able to review?

>>Please feel free to reply to this email as I am here to assist you.

>>We look forward to your response, so we can sort this out as soon as we can. Please be advised that cases will be closed if have gone for more than 48 hours without a response.

>>Thank you for contacting Meta Pro Team. Have a nice day!

>>Tina

>>Meta Pro Team

>>On Wed Feb 14, 2024 09:10:03, Sean wrote:

>>Hi Michael,

>>This is in reference to your Case ID: 760688409278713

>>We already forwarded your concern to our dedicated team.

>>We don't tolerate this kind of behavior in our platform and since they violated our community guidelines we will make sure to do our best to address your request as soon as possible. Once we received a response from them we will definitely reach out to you.

>>We really appreciate your patience on this matter.

>>Thank you for contacting Meta Pro Team. You do have a great day!

>>Regards,

>>Sean

>>Meta Pro Team

>>On Wed Feb 14, 2024 08:13:53, Michael Larea-Flying "L" Ranch wrote:

>>I require specific guidelines for filing defamation.

>>

>>

>

From: Michael Jones  
 To: Meta Support  
 Cc: Director, Domestic Abuse; Melissa Fleckner; Barbara Smith  
 Subject: Re: I want to report an instance of bullying | Case: 76066840977713  
 Date: Monday, February 26, 2024 10:28:29 AM

You don't often get email from michael@flyingranch.ca. [Learn why this is important](#)  
**CAUTION: This email originated from outside the firm. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Beda,

I have been waiting on confirmation from Meta about if what I submitted to you is in the proper format to submit drogues more evidence.

I never hear back regarding those emails and can't have you close the case because 95% of the evidence has yet to be submitted.


Please review the other emails send and advise accordingly, and again do not close the case.

Regards,

Michael D. Lares  
 Flying "L" Ranch LTD.  
 Box 10, Nemiah Valley  
 British Columbia, Canada  
 V0L 1X0

Email [michael@flyingranch.ca](mailto:michael@flyingranch.ca)  
 IG [michael\\_jones](https://www.instagram.com/michael_jones)  
 Web [flyingranch.ca](http://flyingranch.ca)  
 YouTube [Flying L Ranch](https://www.youtube.com/channel/UC...)

Ranch 250-394-7066  
 Cell 250-302-2989  
 Fax 805-283-8372

This is Exhibit " B " referred to in the  
 Affidavit of Michelle El  
 sworn (or affirmed) before me at  
Vancouver B.C.  
 this 06 day of May 2025  
  
 A Commissioner for Taking Affidavits  
 within British Columbia

On Feb 26, 2024, at 10:14 AM, Meta Support <case++asqflurqv6eox@support.facebook.com> wrote:

Hi Michael,

We recognize the importance of getting this resolved as soon as possible and we're happy to check into this!

Thanks for bringing this to our attention and helping keep the Instagram community safe. We removed some of the content you reported from Instagram because it went against our Community Guidelines.

Just to set an expectation, it may take some time before the changes take in effect and reflect. Rest assured, our Dedicated Team confirms that the reported Contents are already taken down. We kindly advise to check it from time to time.

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- >I have responded with several emails and two of the inquiring if the format in which I submitted information was acceptable.
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- >Regards,

>Michael D. Laree  
 >Flying "L" Ranch LTD.  
 >Box 10, Nemah Valley  
 >British Columbia, Canada  
 > V0L 1X0  
 >Email michael@flyingranch.ca <mailto:michael@flyingranch.ca>  
 >IG michael\_laree <https://www.instagram.com/michael\_laree/>  
 >Web flyingranch.ca <http://www.flyingranch.ca/>  
 >YouTube Flying L Ranch <https://www.youtube.com/channel/UCFuwl01zd6hJ38m2mJzgA>  
 >Ranch 250-394-7086  
 >Cell 250-302-2889  
 >Fax 805-263-8372  
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 >>Alisse Andraws - @Oh\_Alisse <https://www.dropbox.com/scl/fo/6128c1818y610n8121710/h?rlkey=nmiov1cq00brdgrbjzvkl1xoz1&dl=0>https://www.dropbox.com/scl/fo/6128c1818y610n8121710/h?rlkey=nmiov1cq00brdgrbjzvkl1xoz1&dl=0  
 >>Jonathan Skeels - @Johnnyvaca and @vacilandos <https://www.dropbox.com/scl/fo/bdwm13hcaxhww71lvjn/h?rlkey=85nvw78c3y8duglbuu37oy3kl&dl=0>https://www.dropbox.com/scl/fo/bdwm13hcaxhww71lvjn/h?rlkey=85nvw78c3y8duglbuu37oy3kl&dl=0  
 >>Deven M. Lamar (O'Rourke) - @lamardeven <https://www.dropbox.com/scl/fo/zupfpwb7rx1hynsmon2/h?rlkey=bnfu7pd1jy227c9wby1vgjve3&dl=0>https://www.dropbox.com/scl/fo/zupfpwb7rx1hynsmon2/h?rlkey=bnfu7pd1jy227c9wby1vgjve3&dl=0

>> Andrea Prescott - @Cooper.Whisper <<https://www.dropbox.com/scl/fo/cw6p8ep7f6cmf17d3a468h?rlkey=9ccrbhjoan8pnf2lg22m808b&dl=0>>  
 >> Kelsey McQuade - @kfstymcquade <<https://www.dropbox.com/scl/fo/hovorqoy1os0rd1f59w/h?rlkey=kps78yr6j3sgud4n01khtoo&dl=0>>  
 >> Elise Resuard - @elise\_recc <<https://www.dropbox.com/scl/fo/4lu8e7icn7d3pppxc6v3/r?rlkey=mSw7ylov6hoy2lm2307dguip5&dl=0>>  
 >> There were multiple other accounts defaming me and joining in on the Instagram accounts of the above. Screenshots of those comments have been submitted in the original chat but I did not build individual files on them.  
 >> Please let me know if there is any further required information or if I misunderstood your request.  
 >> Regards,  
 >> Michael D. Laro  
 >> Flying "L" Ranch LTD.  
 >> Box 10, Nemah Valley  
 >> British Columbia, Canada  
 >> VOL 1X0  
 >> Email michael@flyinglran.ch.ca <<mailto:michael@flyinglran.ch.ca>>  
 >> IG michael\_laro <[https://www.instagram.com/michael\\_laro/](https://www.instagram.com/michael_laro/)>  
 >> Web flyinglran.ch.ca <<http://www.flyinglran.ch.ca/>>  
 >> YouTube Flying L Ranch <  
 >> <https://www.youtube.com/channel/UCFuwl01zk6hJ38xa2mjr2gA>>  
 >> Ranch 250-394-7066  
 >> Cell 250-302-2988  
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 >> On Feb 16, 2024, at 7:43 AM, Meta Support <[case+aa2q1urqv8ao@support.facebook.com](mailto:case+aa2q1urqv8ao@support.facebook.com)> wrote:  
 >> Hi Michael,  
 >> Appreciate your patience on this concern.  
 >> We would like to let you know that your case has been reviewed by our dedicated team in detail earlier.  
 >> Would you be so kind to provide the affected user for the link of the abusive content for us to be able to review?  
 >> Please feel free to reply to this email as I am here to assist you.  
 >> We look forward to your response, so we can sort this out as soon as we can. Please be advised that cases will be closed if have gone for more than 48 hours without a response.  
 >> Thank you for contacting Meta Pro Team. Have a nice day!  
 >> This  
 >> Meta Pro Team  
 >> On Wed Feb 14, 2024 09:10:03, Sean wrote:  
 >> Hi Michael,  
 >> This is in reference to your Case ID: 760888408278713  
 >> We already forwarded your concern to our dedicated team.  
 >> We don't tolerate this kind of behavior in our platform and since they violated our community guidelines we will make sure to do our best to address your request as soon as possible. Once we received a response from them we will definitely reach out to you.  
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 >> Sean  
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 >> On Wed Feb 14, 2024 08:13:53, Michael Laro-Flying "L" Ranch wrote:  
 >> I require specific guidelines for filing defamation.  
 >>  
 >>  
 >>

From: Meta Support  
 To: michael@flyingranch.ca  
 Cc: no-reply@fb.com; Benjamin Mader; Melissa Blackwell; Barbara Pitt  
 Subject: I want to report an instance of bullying | Case: 760666409279713  
 Date: Wednesday, February 28, 2024 9:27:34 AM

You don't often get email from case+aaazqfkuqv6aox@support.facebook.com. [Learn why this is important](#)  
 CAUTION: This email originated from outside the firm. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Michael,

This is regarding the report you shared to us.

Please know that we have conducted a review of the account and content reported.


We found out that it does violate our Instagram Community Guidelines and we have removed it.

We hope this clarifies your concern and it is a pleasure helping you.

Thank you for contacting Meta Pro Team. Have a great day!

Thanks,

Mavy  
Meta Pro Team

This is Exhibit "C" referred to in the  
 Affidavit of Michelle El  
 sworn (or affirmed) before me at  
Vancouver, B.C.  
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 >Please review the other emails send and advise accordingly, and again do not close the case.  
 >Regards,  
 >Michael D. Lares  
 >Flying "L" Ranch LTD.  
 >Box 10, Nemiah Valley  
 >British Columbia, Canada  
 > VOL 1X0  
 >Email michael@flyingranch.ca <maito:michael@flyingranch.ca>  
 >IG michael\_lares <https://www.instagram.com/michael\_lares/>  
 >Web flyingranch.ca <http://www.flyingranch.ca/>  
 >YouTube Flying L Ranch <https://www.youtube.com/channel/UCFuwo1zk6hJ38xa2mjrzgA>  
 >Ranch 250-394-7066  
 >Cell 250-302-2889  
 >Fax 805-283-8372  
 >On Feb 26, 2024, at 10:14 AM, Meta Support <case+aaazqfkuqv6aox@support.facebook.com> wrote:  
 >Hi Michael,  
 >We recognize the importance of getting this resolved as soon as possible and we're happy to check into this!  
 >Thanks for bringing this to our attention and helping keep the Instagram community safe. We removed some of the content you reported from Instagram because it went against our Community Guidelines.  
 >Just to set an expectation, it may take some time before the changes take in effect and reflect. Rest assured: our Dedicated Team confirms that the reported Contents are already taken down. We kindly advise to check it from time to time.  
 >We hope the above information clarifies. You may receive a quick automated survey shortly. Since we have provided all information regarding this matter and there is no further action for us to take, we will be closing this case. We are always looking for ways to improve our service.  
 >Thank you for contacting Meta Pro Team. Have a nice day ahead.  
 >Beda

>Meta Pro Team

>>On Sun Feb 25, 2024 07:00:09, Michael Lares wrote:

>>I have responded with several emails and two of the inquiring if the format in which I submitted information was acceptable.

>>Can you please review said emails and let me know if it is indeed acceptable so I can send a significant amount more evidence?

>>Regards,

>>Michael D. Lares

>>Flying "L" Ranch LTD.

>>Box 10, Nemah Valley

>>British Columbia, Canada

>> V0L 1X0

>>Email michael@flyingranch.ca <mailto:michael@flyingranch.ca>

>>IG michael\_lares <<https://www.instagram.com/michael\_lares/>https://www.instagram.com/michael\_lares/>

>>Web flyingranch.ca <<http://www.flyingranch.ca/>http://www.flyingranch.ca/>

>>YouTube Flying L Ranch <

<https://www.youtube.com/channel/UCFuw1o1zk6hJ38xa2mJrzgA>https://www.youtube.com/channel/UCFuw1o1zk6hJ38xa2mJrzgA>

>>Ranch 250-394-7088

>>Cell 250-302-2989

>>Fax 805-283-8372

>>On Feb 21, 2024, at 7:18 AM, Meta Support <case++aazqfukurqv6sox@support.facebook.com> wrote:

>>Hi Michael,

>>Thanks for getting back to us and we are sending this email about your report for inappropriate contents with the Case ID: 760868408279713.

>>We appreciate all of the screenshots and information you have provided on this case. As of the moment, we have followed up your concern to our specialized team for further investigation and please be assured that they are still looking into this case to resolve this at the soonest possible time.

>>You may also ask how long this may take and we would like to set proper expectations that the review process may depend on the complexity of the issue being investigated.

>>The good thing here is that we will get in touch with you as soon as the review has been completed or if any additional information is required. We ask for your continuous patience and understanding with this process.

>>Thank you for contacting Meta Pro Team. Have a great day.

>>Thanks.

>>Erol

>>Meta Pro Team

>>>On Wed Feb 21, 2024 08:39:36, Michael Lares wrote:

>>>Another Instagram account dedicated solely to defaming me in which suspect @oh\_alisse participated in slander against me the week of Feb 12th. This page has been up for several months now. Please see attached.Regards,Michael D. LaresFlying "L" RanchBox 10, Nemah ValleyBritish Columbia, Canada V0L 1X0Email michael@flyingranch.caWeb flyingranch.caRanch 250-394-7088Cell 250-302-2989Fax 805-283-8372On Feb 18, 2024, at 9:05 AM, Michael Lares <michael@flyingranch.ca>

wrote:Meta,Please find attached one of the several offenders slandering and bullying me with malicious statements and lies. I don't even know this person.Offender @oh\_alisseDate Tuesday February 13, 2024Posted on her stories the following bullying and slanderous statements about me. As well as DM'ing me with slanderous statements.Is this format acceptable as I have several other parties that have committed similar offences against me.

>>>Regards,Michael D. LaresFlying "L" Ranch LTD.Box 10, Nemah ValleyBritish Columbia, Canada V0L 1X0Email michael@flyingranch.caIG michael\_laresWeb flyingranch.caYouTube Flying L Ranch Ranch 250-394-7088Cell 250-302-2989Fax 805-283-8372

>>>On Feb 18, 2024, at 7:53 PM, Meta Support <case++aazqfukurqv6sox@support.facebook.com> wrote: Hi Michael,We appreciate your response.For us to be able to proceed with the investigation, kindly send us the following:- Link of the content where the abusive comments can be found- Screenshot of some of the comments that you want us to review (preferably the most relevant ones)Please note that we cannot open or view files that are saved in external links or drives. We can only view files that are in JPEG or MP4 format.We anticipate your response, so we can sort this out as soon as we can. Please be advised that cases will be closed if they have gone for more than 48 hours without a response.Thank you for contacting Meta Pro Team.Warmest regards,IrishMeta Pro Team >On Fri Feb 18, 2024 18:42:48, Michael Lares wrote:

>>>Hello Tina,

>>>I am not exactly sure what your request is about with reference to "provide the affected user for the link of the abusive content".

>>>I believe you may be referring to the evidence files I have on DropBox so I have included them below. Please advise if you were requesting something different.

>>>The below individuals have been collectively conspiring against me in a very public defaming campaign on their Instagram lives, posts and other various content mediums. This began back in November of 2023. In the below files are many screenshot and screen recordings of the scilious and blatant lies and accusations as they try to create conversation to defame me with other followers. I have retained legal representation and we are preparing a civil conspiracy case against all of the following:

>>>Devyn McMillan - @thedevyndestinee <<https://www.dropbox.com/sc/fo/v084j0baqmibf0g28wy8e/n?rlkey=18m7ca2bbfd08ac5py8957y8a8d1=0>https://www.dropbox.com/sc/fo/v084j0baqmibf0g28wy8e/n?rlkey=18m7ca2bbfd08ac5py8957y8a8d1=0> <https://www.dropbox.com/sc/fo/v084j0baqmibf0g28wy8e/n?rlkey=18m7ca2bbfd08ac5py8957y8a8d1=0>

rlkey=18m7ca2bbfdu8ac6py8967y6e&dl=0> https://www.dropbox.com/scl/fo/vo84j0bsqmbf0g26wy8e/h?  
 rlkey=18m7ca2bbfdu8ac6py8967y6e&dl=0  
 >>>Allise Andrews - @Oh\_Allise < https://www.dropbox.com/scl/fo/8k28d8l8y6l0n8l2170/h?  
 rlkey=nmlov1cq00brdgrtjzvk1xozl&dl=0> https://www.dropbox.com/scl/fo/8k28d8l8y6l0n8l2170/h?  
 rlkey=nmlov1cq00brdgrtjzvk1xozl&dl=0> <https://www.dropbox.com/scl/fo/8k28d8l8y6l0n8l2170/h?  
 rlkey=nmlov1cq00brdgrtjzvk1xozl&dl=0> https://www.dropbox.com/scl/fo/8k28d8l8y6l0n8l2170/h?  
 rlkey=nmlov1cq00brdgrtjzvk1xozl&dl=0

>>>Jonathan Skeels - @Johannyvaca and @vaclandos < https://www.dropbox.com/scl/fo/bdwim3hcaudwww7l/vj/h?  
 rlkey=88nwv78c3y8duglbuu37ey3k1&dl=0> https://www.dropbox.com/scl/fo/bdwim3hcaudwww7l/vj/h?  
 rlkey=88nwv78c3y8duglbuu37ey3k1&dl=0> <https://www.dropbox.com/scl/fo/bdwim3hcaudwww7l/vj/h?  
 rlkey=88nwv78c3y8duglbuu37ey3k1&dl=0> https://www.dropbox.com/scl/fo/bdwim3hcaudwww7l/vj/h?  
 rlkey=88nwv78c3y8duglbuu37ey3k1&dl=0

>>>Deven M. Lamar (ORourke) - @lamardeven < https://www.dropbox.com/scl/fo/zupfpwb7rx1ltyynamon2/h?  
 rlkey=bnfu7pd1jy227c8wby1vgjvs3&dl=0> https://www.dropbox.com/scl/fo/zupfpwb7rx1ltyynamon2/h?  
 rlkey=bnfu7pd1jy227c8wby1vgjvs3&dl=0> <https://www.dropbox.com/scl/fo/zupfpwb7rx1ltyynamon2/h?  
 rlkey=bnfu7pd1jy227c8wby1vgjvs3&dl=0> https://www.dropbox.com/scl/fo/zupfpwb7rx1ltyynamon2/h?  
 rlkey=bnfu7pd1jy227c8wby1vgjvs3&dl=0

>>>Andrea Prescott - @Cooper.Whisper < https://www.dropbox.com/scl/fo/cw6p8ep7l8om117d3af46/h?  
 rlkey=9ccbhjxun8pnf2lg22m808b&dl=0> https://www.dropbox.com/scl/fo/cw6p8ep7l8om117d3af46/h?  
 rlkey=9ccbhjxun8pnf2lg22m808b&dl=0> <https://www.dropbox.com/scl/fo/cw6p8ep7l8om117d3af46/h?  
 rlkey=9ccbhjxun8pnf2lg22m808b&dl=0> https://www.dropbox.com/scl/fo/cw6p8ep7l8om117d3af46/h?  
 rlkey=9ccbhjxun8pnf2lg22m808b&dl=0

>>>Kristy McQuade - @kristymcquade < https://www.dropbox.com/scl/fo/hovorqoy1os0ridf89w/h?  
 rlkey=kpe76yr8j3zguu4n01khtco&dl=0> https://www.dropbox.com/scl/fo/hovorqoy1os0ridf89w/h?  
 rlkey=kpe76yr8j3zguu4n01khtco&dl=0> <https://www.dropbox.com/scl/fo/hovorqoy1os0ridf89w/h?  
 rlkey=kpe76yr8j3zguu4n01khtco&dl=0> https://www.dropbox.com/scl/fo/hovorqoy1os0ridf89w/h?  
 rlkey=kpe76yr8j3zguu4n01khtco&dl=0

>>>Elise Reculard - @elise\_recc < https://www.dropbox.com/scl/fo/4lu8e7lcn7d3ppppzc5v3/h?  
 rlkey=m3w7yfov8hoy2fm2307dgu5&dl=0> https://www.dropbox.com/scl/fo/4lu8e7lcn7d3ppppzc5v3/h?  
 rlkey=m3w7yfov8hoy2fm2307dgu5&dl=0> <https://www.dropbox.com/scl/fo/4lu8e7lcn7d3ppppzc5v3/h?  
 rlkey=m3w7yfov8hoy2fm2307dgu5&dl=0> https://www.dropbox.com/scl/fo/4lu8e7lcn7d3ppppzc5v3/h?  
 rlkey=m3w7yfov8hoy2fm2307dgu5&dl=0

>>>There were multiple other accounts defaming me and joining in on the Instagram accounts of the above. Screenshots of those comments have been submitted in the original chat but I did not build individual files on them.

>>>Please let me know if there is any further required information or if I misunderstood your request.

>>>Regards,

>>>Michael D. Lares

>>>Flying "L" Ranch LTD.

>>>Box 10, Nemiah Valley

>>>British Columbia, Canada

>>> VOL 1X0

>>>Email michael@flyingranch.ca <mailto:michael@flyingranch.ca>

>>>IG michael\_lares < < https://www.instagram.com/michael\_lares/>https://www.instagram.com/michael\_lares/>

>>>https://www.instagram.com/michael\_lares/>https://www.instagram.com/michael\_lares/>

>>>Web flyingranch.ca < < http://www.flyingranch.ca/>http://www.flyingranch.ca/>

>>>http://www.flyingranch.ca/>http://www.flyingranch.ca/>

>>>YouTube Flying L Ranch < <

>>>https://www.youtube.com/channel/UCFuwl01zk8hJ38xa2mjrzgA>https://www.youtube.com/channel/UCFuwl01zk8hJ38xa2mjrzgA>

>>>https://www.youtube.com/channel/UCFuwl01zk8hJ38xa2mjrzgA>https://www.youtube.com/channel/UCFuwl01zk8hJ38xa2mjrzgA>

>>>Ranch 280-394-7088

>>>Call 280-302-2989

>>>Fax 805-283-8372

>>>On Feb 15, 2024, at 7:43 AM, Meta Support <case++aazqf0urqv6a0x@support.facebook.com> wrote:

>>>Hi Michael,

>>>Appreciate your patience on this concern.

>>>We would like to let you know that your case has been reviewed by our dedicated team in detail earlier.

>>>Would you be so kind to provide the affected user for the link of the abusive content for us to be able to review?

>>>Please feel free to reply to this email as I am here to assist you.

>>>We look forward to your response, so we can sort this out as soon as we can. Please be advised that cases will be closed if have gone for more

McQuarrie Hunter LLP  
Suite 1500, 13450 - 102 Ave  
Surrey, BC V3T 5X3  
Tel: 604.581.7001  
Fax: 604.581.7110  
www.mcquarrie.com

Managing Lawyer: Royal J. Morton  
E-Mail: rmorton@mcquarrie.com

Associate Lawyer: Benjamin P. Morley  
E-Mail: bmorley@mcquarrie.com

Legal Administrative Assistant: Barbara Polk  
E-Mail: bpolk@mcquarrie.com  
Direct Line: 604.580.7067

Our File No.: 240945

February 19, 2025

VIA EMAIL [dlambert@eyfordpartners.com](mailto:dlambert@eyfordpartners.com)

Eyford Partners LLP  
1744-1055 Dunsmuir Street  
Vancouver, BC V7X 1L2

Attention: Drummond Lambert

Dear Sir:

Re: **Michael Lares v. Peter van der Heyden and Flying "L" Ranch Ltd.**  
**SCBC Vancouver Action no. S248901**

This is Exhibit " D " referred to in the  
Affidavit of Michelle El  
sworn (or affirmed) before me at  
Vancouver, B.C.  
this 06 day of May, 2025.

  
A Commissioner for Taking Affidavits  
within British Columbia

Thank you for your letter of February 13, 2025.

We never received a response from you about whether Mr. van der Heyden was the source of the Ministry's information that the works associated with the water licence in question were never constructed. Our client will proceed on the basis that Mr. van der Heyden was the source. We ask again what purpose was served by that disclosure -- Mr. Lares has had to negotiate with the Ministry to get more time to respond beyond the 30 days.

The complications arising from Mr. van der Heyden's disclosure to the Ministry reinforce why our client needs to part ways with Mr. van der Heyden, both for his benefit and that of the business. In another instance, Mr. van der Heyden is using his position as a director of the Flying "L" Ranch Ltd. (the "Company") or as owner of the 80 Acres to interfere with Mr. Lares' operation of the ranch and the Company by posting comments addressed to, and messaging, a social media content creator living at the ranch for the past few weeks.

Attached are screenshots of comments and a message Mr. van der Heyden sent to or posted on Carmen Powell-Sadik's Instagram telling her that there are "...a lot of other things Michael may not have told you about..." and "You don't have permission to hunt on my land." In the message he tells Ms. Powell-Sadik that, among other things, "if you are hunting rabbits on my 80 Acres (yeah, Michael probably didn't tell you it's not his land, did he), I need to tell you that you don't have my permission...". Mr. van der Heyden also sent a similar message on Instagram to Mr. Lares' wife, Nicole, concerning hunting of rabbits.

Ms. Powell-Sadik and Mr. Lares were collaborating on Instagram and YouTube to generate followers, which in turn is a revenue stream for the Company. We are advised that Mr. van der

Heyden's messaging has interfered with that, and it has caused Ms. Powell-Sadik to shorten her stay at the ranch.

If Mr. van der Heyden wishes to speculate about which land someone like Ms. Powell-Sadik is accessing to create content or hunt rabbits, or how many rabbits she or Nicole Lares are hunting on a given day and where, or whether the right of first refusal ("ROFL") permits any hunting, we ask that such speculations or opinions be directed to us. We would forward them to Mr. Lares for instructions -- Mr. Lares remains the day to day manager of the Company's ranch and business.

The ROFL language is broad in respect of unrestricted access to the 80 Acres for ranching purposes. Mr. van der Heyden has messaged as above on the assumption hunting is occurring on the 80 Acres, and that the ROFL access does not include hunting on that land within the provincial limits, even where that is intended to generate revenue from the ranch for the Company.

As for the comments in your letter, we provided to Mr. van der Heyden's previous lawyer a copy of the communications from our previous defamation file. Between that and the additional documents provided to you, we are unclear about what additional documents requested from our office you are seeking -- please advise.

Concerning mediation, we will seek instructions, but Mr. Lares remains of the view that only a court order will bring this matter to an end. Mr. van der Heyden already agreed to sell his shares and the 80 Acres, then backed off. He is now apparently trying to undermine the value of the very shares in the Company Mr. Lares intends to buy for \$2 million. Whether it be complicating the Company's relations with the Ministry, harassing Mr. Lares' wife or interfering in the Company's effort to generate revenue as noted above, Mr. van der Heyden seems intent on creating issues.

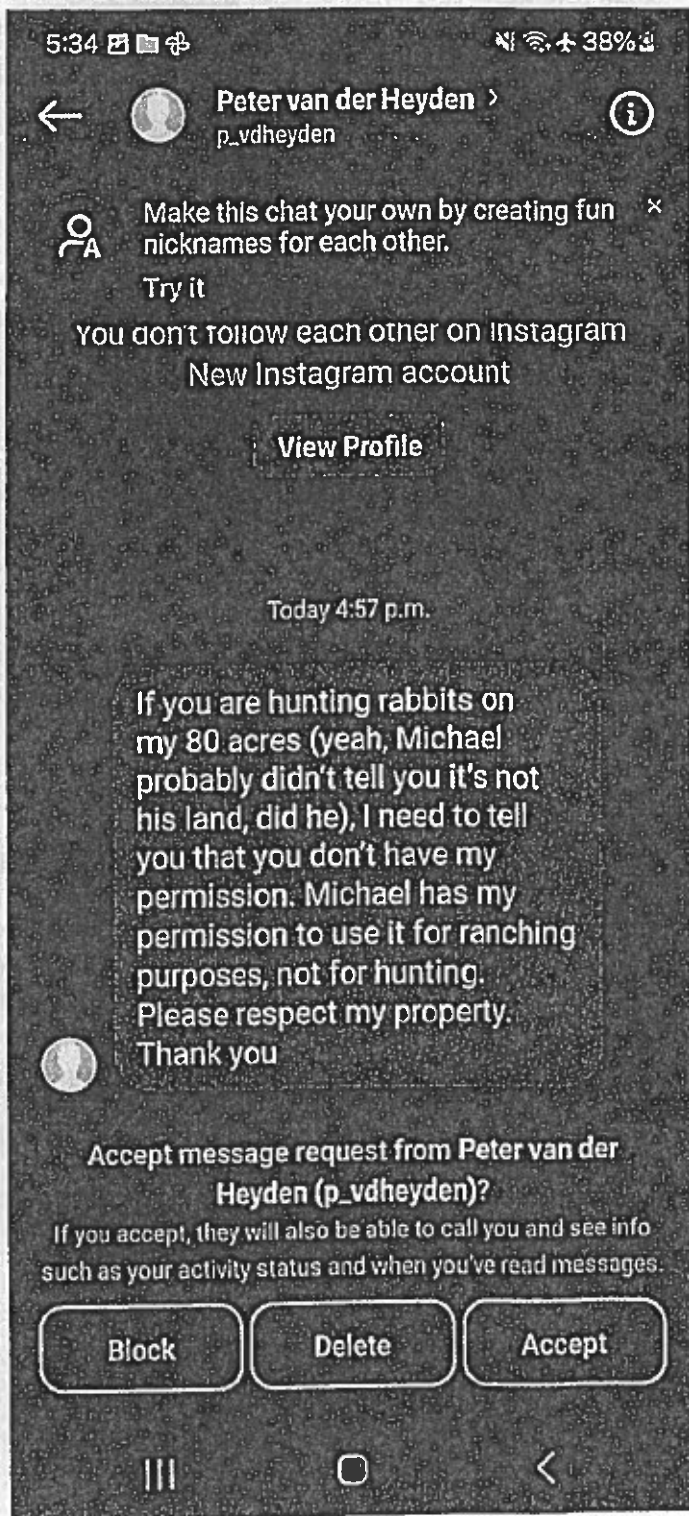
We do not see Mr. van der Heyden raising any conflict of interest issue in good faith or raising in good faith whether the Company needs to spend money on retaining counsel -- Mr. Lares does not agree that the Company requires counsel. To the extent Mr. van der Heyden disagrees with that, the 50/50 deadlock on that point would be another reason why the court should grant the relief sought in the petition.

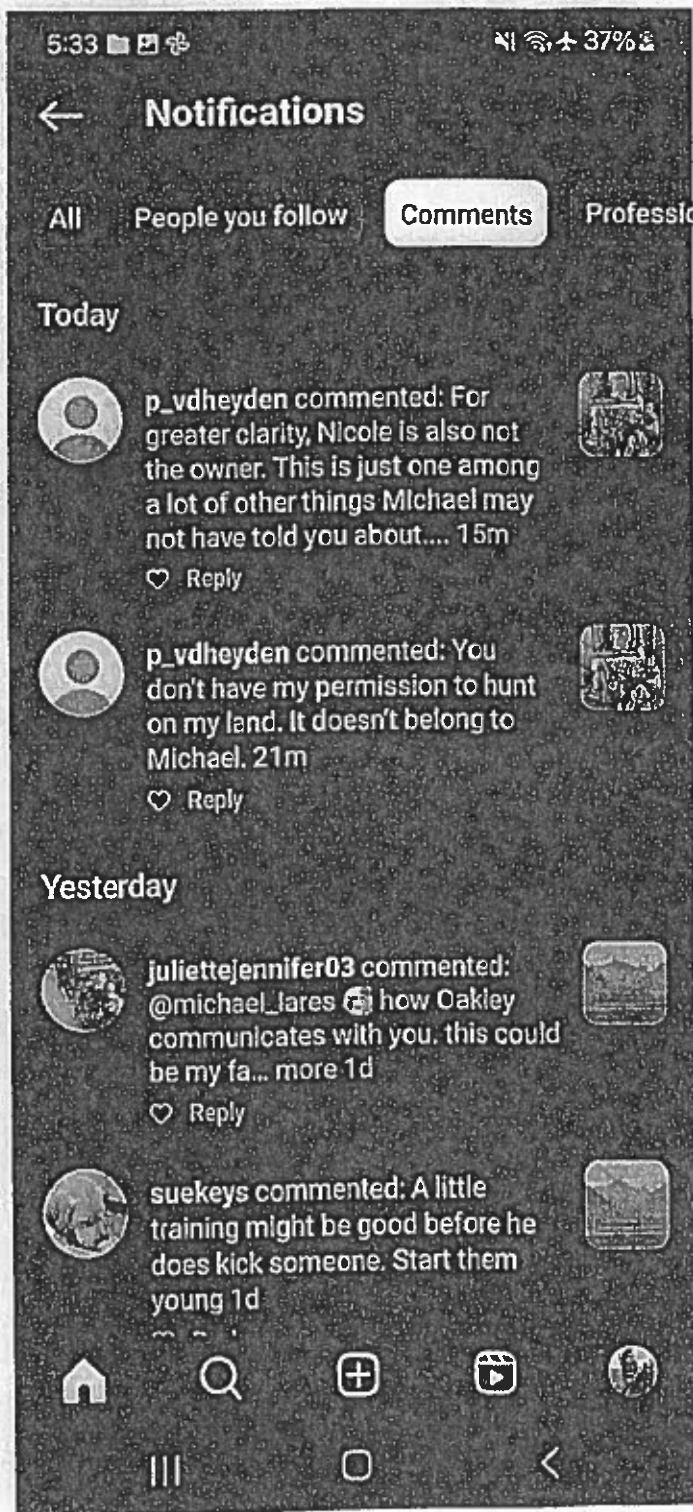
Upon receipt and review of your response material, our office will contact yours to schedule a hearing date. In the meantime, upon assessment of your material and Mr. van der Heyden discontinuing his interference with Company business, we will take instructions about whether there is any point to mediation or some other settlement mechanism.

Yours truly,

**MCQUARRIE HUNTER LLP**

**ROYAL J. MORTON\***  
Partner  
Royal Morton Law Corporation  
RJM/rjp  
Encl.





**EYFORD**  
PARTNERS

DRUMMOND LAMBERT  
DIRECT: 804.899.6206  
DLAMBERT@EYFORDPARTNERS.COM

18 March 2025

FILE NO.: 10650-001


VIA E-MAIL: [rmorton@mcquarrie.com](mailto:rmorton@mcquarrie.com)

McQuarrie Hunter LLP  
Suite 1500, 13450 102 Avenue  
Surrey, BC V3T 5X3

**Attention: Royal Morton**

Dear Mr. Morton:

**RE: Lares, Michael v. van der Heyden, et al.**  
**SCBC Vancouver Action No. S248901**

This is Exhibit " E " referred to in the  
Affidavit of Michelle El  
sworn (or affirmed) before me at  
Vancouver, B.C.  
this 06 day of May, 2025.  
  
A Commissioner for Taking Affidavits  
within British Columbia

We write in response to your letter of 06 March 2025 to raise a number of matters. We have organized them by heading for ease of reference.

**I. CONFLICT OF INTEREST**

We firstly write to advise that, having reviewed in greater detail the law and evidence (in particular, s. VIII.(A) of Part 4 of the petition response and case law arising from *MacDonald Estate v. Martin*, [1990] 3 S.C.R. 1235), we are of the view that McQuarrie is in a conflict of interest. The petition plainly states that the Company engaged McQuarrie in a matter where it obtained confidential information and McQuarrie is now relying on that work as a basis for a proceeding against our client and the Company.

We again request – for the third time – that McQuarrie disclose to Mr. van der Heyden: copies of all invoices issued by McQuarrie to the Company and any communications indicating the Company has consented to McQuarrie acting against the Company in this proceeding. We further request unredacted copies of reporting letters issued to the Company.

EYFORD PARTNERS LLP  
eyfordpartners.com

1744 - 1055 Dunsmuir Street  
PO Box 49254  
Vancouver, BC V7X 1L2  
P: 604 899 5240 F: 604 899 5218

207-3500 Carrington Road  
West Kelowne, BC V4T 3C1  
P: 778 754 0285 F: 778 754 0287

- 2 -

We are instructed to apply for McQuarrie's disqualification as counsel. Please provide your availability no later than 4:00pm on 24 March 2025 for a 2-hour application (assuming the application is contested) on any of: April 11, 15-17, or 22-25.

## **II. COMPANY ASSETS AND BOOKKEEPING**

We further demand your office immediately provide a copy of a Company asset list, along with its bookkeeping and PayPal file.

Both are required for Mr. van der Heyden to supervise the Company's affairs properly. They are further relevant to the Company's valuation and the relief sought by Mr. van der Heyden. Provided the Company can be properly valued, Mr. van der Heyden is prepared to make an unconditional cash offer to purchase Mr. Lares' shares so further litigation can be avoided.

Please note that, further to Mr. Larocque's letter of 03 July 2024, our client does not consent to any material transactions being conducted by Mr. Lares on behalf the Company. Any disposition of Company assets will be considered misappropriation and litigation will be initiated as appropriate.

## **III. INSURANCE AND DISTRICT LOT 199**

Our client has brought to our attention that, apparently, hunting has been occurring on the 80 Acres. Hunting has no relation to the Company activities that were previously permitted on the 80 Acres and we hereby demand Mr. Lares immediately cease and desist from allowing anyone to hunt on the 80 Acres.

While looking into this issue, it has come to our attention that there are serious insurance-related concerns in regard the 80 Acres, in that Mr. van der Heyden's homeowner policy does not cover activities on such lands.

Mr. van der Heyden is unclear about the Company's insurance coverage, so we are accordingly concerned about the possibility that there is no insurance policy in effect which would respond to claims involving the 80 Acres.

Mr. van der Heyden will make inquiries about obtaining additional insurance but is concerned about the possibility that – as of today – no insurance would respond to claims involving the 80 Acres. For the time being, he must withdraw his consent in regard to the Company's continued use of the 80 Acres until this insurance matter is resolved.

In that regard, can you please forward us all property and commercial general liability policies applying to the Company and the 160 Acres? We will need to review same to assess how any coverage would apply to activities on the 80 Acres. Mr. van der Heyden advises he is willing discuss ranching activities (not hunting) reoccurring on the 80 Acres once this insurance issue is addressed.

- 3 -

**IV. THE WATER LICENCE**

In regard to the domestic water licence, we confirm Mr. van der Heyden had concerns about the Company's exposure to regulatory penalties, that he consulted with the water authority, and that he sought their instructions in regard to the matter.

Upon review of the 16 January 16, 1987 conditional license #83389, Mr. van der Heyden understands no water is diverted or used, and no works have been completed or removed (as authorized by this licence), rendering completion of the beneficial use declaration ("BUD") simple and straightforward.

To facilitate timely submission of the BUD to the ministry, Mr. van der Heyden has largely completed the relevant form. Mr. van der Heyden is unaware whether there are additional water licences servicing the 160 Acres and is therefore unable to complete the related question in section A-2.

If Mr. Lares would review the attached BUD, complete the part of section A-2 regarding additional licenses, and return the BUD with his dated signature to our office, Mr. van der Heyden will review and submit the fully completed form accordingly.

Yours truly,

EYFORD PARTNERS LLP

Per: 

Drummond Lambert

DL/me  
Encls.



**Beneficial Use Declaration**  
 Direction & Order To Submit Declaration  
 Section 30 (2) of the *Water Sustainability Act*

**Section 1: For office use only**

**Ministry of Water, Land and Resource Stewardship**

c/o Marie McCallum

400-640 Borland St

Williams Lake, BC V2G 4T1

marie.mccallum@gov.bc.ca | 250-302-4287

Water Licence No.:	C063369	File Number:	0365308
Client Name:	Flying "L" Ranch Ltd.		
Address:	PO Box 10, Nemiah Valley, BC V0L 1X0		
Source:	Billy Goat Creek	PID:	011-225-661
The above water licence is appurtenant to the land with the legal description of: DISTRICT LOT 383 RANGE 2 COAST DISTRICT			

**Section 2: To be completed by licensee or landowner diverting or using water**

**Instructions**

1. Review the water licence that was attached to your cover letter.
2. Complete Section A and attach to this form and any additional information that has been requested in the cover letter.
3. Sign the declaration under Section B and return this form by mail or email to the address above within 30 days from the date you are deemed to have received the cover letter and this form.<sup>1</sup>

Please be advised that failing to submit this declaration, as directed by this order, within the time specified above, may result in a portion of the rights under the licence being considered for possible suspension or cancellation proceedings.

**SECTION A - DECLARATION OF USE**

In the 3 years preceding the date of this declaration, have you made beneficial use of the quantity of water (in-part or in- full), authorized to be diverted under the licence?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If you answered "no" please explain in the 'comments box' below.
In the 3 years preceding the date of this declaration, have you complied with all of the terms and conditions of the licence?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If you answered "no" please explain in the 'comments box' below.
<b>Comments</b>	
There has been no beneficial use of water under licence C063369. Works have never been constructed. All questions related to beneficial use under licence C063369 in Section A and Section A-1 are therefore not applicable. Section A-2 is applicable and completed accordingly.	
<b>WATER USE PURPOSES</b>	
Section 2 of the <i>Water Sustainability Act</i> (WSA) and Schedule A of the <i>Water Sustainability Regulation</i> provide definitions, descriptions and additional information on water use purposes.	

<sup>1</sup> Section 117(2) *Water Sustainability Act* describes how the Province determines when something is deemed to be delivered.

**Please select the purpose(s) for which you are using water under the licence, as applicable.**

<input type="checkbox"/> <b>Domestic:</b> Dwellings, Buildings, garden (Less than 1,000 m <sup>2</sup> )	<input type="checkbox"/> <b>Irrigation</b> Watering of crops	<input type="checkbox"/> <b>Storage</b> Retaining water for use at a another time	<input type="checkbox"/> <b>Industrial: Stock Watering</b> Watering livestock
<input type="checkbox"/> <b>Industrial: Garden/Lawn Watering</b> Garden/field/lawn over 1,000 m <sup>2</sup>	<input type="checkbox"/> <b>Mining</b> Recovering minerals from the ground	<input type="checkbox"/> <b>Power</b> Generating electricity	<input type="checkbox"/> <b>Waterworks</b> Delivering water to other persons

**Please describe other purposes for which you are using water under this licence:**  
 **Other: There has been no beneficial use of water under licence C063369**

**QUANTITY OF WATER USED:**  
 Please indicate the amount of water by [measurement OR estimate] (circle one) that you are using under the licence for each purpose:

Water use Purpose	Water amount	Units (circle one)	Time period (circle one)
		Cubic metres / acre feet / gallons / litres	second / day / year
		Cubic metres / acre feet / gallons / litres	second / day / year
		Cubic metres / acre feet / gallons / litres	second / day / year

**OR**

**If you do not know the amount of water you are using, please provide further information about your water use:**

Number of dwellings being serviced		List building types or descriptions	
Number of acres being irrigated/watered:		Number & type of livestock being supplied:	
Quantity of water stored:		Size of Pond / Reservoir:	

Please provide any other information you can provide that might inform a water use determination.  
**There has been no beneficial use of water under licence C063369**

**SECTION A-1 – Additional information about your works**

**CONSTRUCTED WORKS**  
 Commonly constructed works include an intake, pump, pipe, diversion structure, sprinklers, ditch, trough, pond, dam, reservoir, or a storage tank, but may include any component used to divert, use or store water under the licence. Please list all works in use in sections below.

**Answer the following questions concerning the authorized works listed in the licence:**

Are the works listed in the licence constructed?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Partially
Are the works listed in the licence in use?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Partially

**Comments:**

**Describe any additional works that were constructed (not listed in the licence):**

Type of work	Is the work in use?		Are the works on private land or on Crown (public) land?	
	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Private	<input type="checkbox"/> Crown
	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Private	<input type="checkbox"/> Crown
	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Private	<input type="checkbox"/> Crown
	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Private	<input type="checkbox"/> Crown
	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Private	<input type="checkbox"/> Crown



**SECTION B – SIGNATURES**

Your signature and the signatures of anyone else whose name is on your land title for appurtenant land, described in your water licence, are required below.

I hereby declare that the information contained in this Declaration is true to the best of my knowledge, information and belief.

Name (Owner 1): Michael D. Lares (Director)  
*(Print Name)* *(Signature)* *(Date)*  
Address: 8554 Nemaiah Valley Road, Nemaiah Valley, BC, V0L 1X0  
Phone Number: (250) 302-2989 Email: michael@flyingtranch.ca

I hereby declare that the information contained in this Declaration is true to the best of my knowledge, information and belief.

Name (Owner 2): Peter van der Heyden (Director)  
*(Print Name)* *(Signature)* *(Date)*  
Address: 8060 Birch Way, Halfmoon Bay, BC, V0N 1Y2  
Phone Number: (604) 885-0725 Email: p\_vdheyden@yahoo.ca

I hereby declare that the information contained in this Declaration is true to the best of my knowledge, information and belief.

Name (Owner 3): \_\_\_\_\_  
*(Print Name)* *(Signature)* *(Date)*  
Address: \_\_\_\_\_  
Phone Number: \_\_\_\_\_ Email: \_\_\_\_\_

I hereby declare that the information contained in this Declaration is true to the best of my knowledge, information and belief.

Name (Owner 4): \_\_\_\_\_  
*(Print Name)* *(Signature)* *(Date)*  
Address: \_\_\_\_\_  
Phone Number: \_\_\_\_\_ Email: \_\_\_\_\_

Please provide below any further information that you consider to be relevant:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

McQuarrie Hunter LLP  
Suite 1500, 13450 - 102 Ave  
Surrey, BC V3T 5X3  
Tel: 604.581.7001  
Fax: 604.581.7110  
WWW.MCQUARRIE.COM

Managing Lawyer: Royal J. Morton  
E-Mail: rmorton@mcquarrie.com

Associate Lawyer: Benjamin P. Morley  
E-Mail: bmorley@mcquarrie.com

Legal Administrative Assistant: Barbara Poth  
E-Mail: bpoth@mcquarrie.com  
Direct Line: 604-580-7081

Our File No.: 240946

March 24, 2025

VIA EMAIL [dlambert@eyfordpartners.com](mailto:dlambert@eyfordpartners.com)

Eyford Partners LLP  
1744-1055 Dunsmuir Street  
Vancouver, BC V7X 1L2

Attention: Drummond Lambert

Dear Sir:

Re: **Michael Lares v. Peter van der Heyden et al**  
**SCBC Vancouver Action no. S248901 ("Oppression Proceeding")**  
**Michael Lares v. Devyn McMillen et al**  
**SCBC New Westminster Registry Action No. S257137 ("Defamation Action")**  
**Peter van der Heyden v. Michael Lares**  
**SCBC Vancouver Registry Action No. S243219 (the "Van der Heyden Action").**

This is Exhibit " F " referred to in the  
Affidavit of Michelle El  
sworn (or affirmed) before me at  
Vancouver, B.C.  
this 06 day of May, 20 25.

  
A Commissioner for Taking Affidavits  
within British Columbia

Thank you for your letter of March 18, 2025.

We do not agree with your statements about us being in a conflict of interest.

We do not accept the premise of your repeated question about needing consent from the Company to represent Mr. Lares in the Oppression Proceeding. We did not receive confidential information from what would be our original file, No. 240167, that we are now trying to use as a basis to act against the Company or Mr. van der Heyden. We provided redacted documents to you from that file, and we raised questions with you in our previous correspondence.

You are correct in your assumption that an application to remove us as counsel in the Oppression Proceeding would be contested. Given the scope of matters apparently in dispute, we would expect that more than 2 hours will be needed, but we will wait to receive your application material. Given that a conflict of interest is being raised, we will need to retain other counsel to respond to and argue the application. We expect that counsel will in due course advise you of their availability, but we would suggest sending us your unfiled application material in the interim.

With your client's application now pending, we are obliged to cease further work in the Oppression Proceeding pending the outcome of Mr. van der Heyden's application. We anticipate getting back to you by the end of this week concerning the engagement of other counsel.

Based on the serious allegations of misappropriation and breach of fiduciary duty made by your client against Mr. Lares in the Van der Heyden Action, and the position taken in the Oppression Proceeding, our client has more reason to believe that Mr. van der Heyden's concerns are not being raised in good faith. In response to your request for Company assets, attached are a copy of the most recent Company tax return and balance sheet information filed by the accountant in 2024, and the spreadsheet our client had prepared previously.

Our client does not believe it would be in his or the Company's best interests to share the PayPal file with Mr. van der Heyden. We are unclear about what bookkeeping file you are referring to, but if it is the one maintained by the Company accountant, Mr. Lares will not authorize that release to your client.

Your client remains a director and shareholder of the Company on account of his failure to proceed with the agreed buy-out of his interest in 2024. He has never had any involvement in the Company's business affairs. Mr. Lares remains vigorously opposed to suddenly giving Mr. van der Heyden a veto on "any material transaction" on behalf of the Company. Any material transactions involving the disposition of Company assets would be in the ordinary course of business. Mr. Lares will not be mortgaging Company assets or selling anything else outside of the ordinary course of business of the ranch.

If your client has specific questions about business operations, please direct those to our attention and we will forward them to Mr. Lares. Concerning insurance, our client would strongly disagree that lawful and licenced hunting is not part of the operation of a ranch. If Mr. van der Heyden suddenly has concerns about liability to third parties using the 80 Acres, again that would not appear to be raised in good faith. Assuming that this concern is being raised in good faith, please forward a copy of Mr. van der Heyden's policy for the 80 Acres and we will take instructions.

In the meantime, we are instructed that obtaining liability insurance satisfactory to Mr. van der Heyden was never a condition of Mr. Lares' use of the 80 Acres on behalf of the Company or otherwise.

Concerning the water licence, we are advised that there is a discrepancy on the Ministry form your client filled out. Mr. Lares will correct that error and we will forward that to you for Mr. van der Heyden's signature and return, once we receive that from our client. We are advised that Mr. Lares has been in communications with the Ministry.

Yours truly,

**MCQUARRIE HUNTER LLP**



**ROYAL J. MORTON\***

Partner

\*Royal Morton Law Corporation

RJM/bjp

Encs.

**Drummond Lambert**

**From:** Drummond Lambert <dlambert@eyfordpartners.com>  
**Sent:** Friday, April 11, 2025 1:02 PM  
**To:** Cole Rodocker  
**Cc:** Douglas Eyford; Michelle El  
**Subject:** RE: Lares v. van der Heyden

Cole:

We've reviewed these materials and do not view them as material to the case at hand.

Your application response comments:

*As in Canadian National Railway Co., v. McKercher LLP, 2013 SCC 39 at para. 23 ("McKercher"), disqualification applications are brought in the context of situations where a party like Kahlon is a former or current client. They are neither. For that reason alone, this Application falls. [Your emphasis.]*

That was not the case in the application you responded to, which appears to have been ill-conceived.

Here, McQuarrie is acting against a former client, by its own admission:

- McQuarrie acted for the Company from January 2024 to at least April 2024 in a defamation matter.
- McQuarrie has now commenced a proceeding in which the Company is a respondent and seeks relief affecting the Company's interests.
- In Part 2 (Factual Basis) of the petition, McQuarrie relies on its engagement by the Company as part of its basis for the relief sought (see petition at paras. 23-24). In the circumstances, the two engagements are clearly related.

Based on the part of McQuarrie's file we've received, it's clear they received confidential information in the course of that engagement. We do not know how McQuarrie could assert otherwise.

When we drew this matter to the attention of an LSBC practice advisor, she agreed McQuarrie couldn't act in this matter. Like us, she was confused as to how McQuarrie could not see the conflict of interest.

All of this is to speak nothing of the other issues with McQuarrie's file identified in paragraphs 92-114 of our petition response.

We would hope McQuarrie will reconsider its position in regard to this matter. If not, I would propose proceeding with an application on one of the following dates: May 5, 7, 12-13, 16, or 20. Please advise as to your position and availability by end of day Tuesday.

Regards,

Drummond

This is Exhibit " G " referred to in the  
 Affidavit of Michelle El  
 sworn (or affirmed) before me at  
Vancouver, B.C.  
 this 06 day of May, 2025.

  
 A Commissioner for Taking Affidavits  
 within British Columbia

**Drummond Lambert**  
Associate

t: 604 899 5205  
f: 604 899 5216

Email: [dlambert@eyfordpartners.com](mailto:dlambert@eyfordpartners.com)

**EYFORD**  
PARTNERS LLP

**Eyford Partners LLP**  
1744 – 1055 Dunsmuir Street, PO Box 49254  
Vancouver, BC V7X 1L2, Reception: 604 899 5240

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**From:** Cole Rodocker <[crodocker@hamiltonduncan.com](mailto:crodocker@hamiltonduncan.com)>  
**Sent:** Tuesday, April 8, 2025 2:19 PM  
**To:** Drummond Lambert <[dlambert@eyfordpartners.com](mailto:dlambert@eyfordpartners.com)>  
**Subject:** RE: Lares v. van der Heyden

Hi Drummond,

As discussed. The original application is a garbled mess and was drafted by a paralegal but if you want to see that too let me know.

Cole

**hamilton  
duncan**

**Cole Rodocker | Partner**  
D: 604.580.4770 | T: 604.581.4677 | F: 604.581.5947  
E: [crodocker@hamiltonduncan.com](mailto:crodocker@hamiltonduncan.com)  
\* Law Corporation

 Hamilton Duncan Law Corporation  
Suite 1450 - 13401 108th Avenue  
Surrey, BC, Canada V3T 5T3

[hamiltonduncan.com](http://hamiltonduncan.com)

*Hamilton Duncan respectfully acknowledges the Katzie, Semiahmoo, Kwantlen and other Coast Salish Peoples on whose shared and unceded traditional territories our office is located.*

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**From:** Drummond Lambert <[dlambert@eyfordpartners.com](mailto:dlambert@eyfordpartners.com)>  
**Sent:** Tuesday, April 8, 2025 1:05 PM  
**To:** Cole Rodocker <[crodocker@hamiltonduncan.com](mailto:crodocker@hamiltonduncan.com)>  
**Subject:** RE: Lares v. van der Heyden

Cole:

2:00pm works. Talk to you then.

Regards,

Drummond

**Drummond Lambert**

Associate

t: 604 899 5205

f: 604 899 5216

Email: [dlambert@eyfordpartners.com](mailto:dlambert@eyfordpartners.com)

**EYFORD**  
PARTNERS

Eyford Partners LLP

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Vancouver, BC V7X 1L2, Reception: 604 899 5240

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From: Cole Rodocker <[crodocker@hamiltonduncan.com](mailto:crodocker@hamiltonduncan.com)>

Sent: Tuesday, April 8, 2025 12:25 PM

To: Drummond Lambert <[dlambert@eyfordpartners.com](mailto:dlambert@eyfordpartners.com)>

Subject: RE: Lares v. van der Heyden

Good afternoon Drummond,

Any time before 3:30 is most convenient for me. My son has soccer practice at 4:30 so I have to pick him up at 4 from daycare.

Cole

**hamilton  
duncan**

Cole Rodocker | Partner

D: 604.580.4770 | T: 604.581.4677 | F: 604.581.5947

E: [crodocker@hamiltonduncan.com](mailto:crodocker@hamiltonduncan.com)

\* Law Corporation



Hamilton Duncan Law Corporation  
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Surrey, BC, Canada V3T 5T3

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-----  
*Hamilton Duncan respectfully acknowledges the Katzie, Semiahmoo, Kwantlen and other Coast Salish Peoples on whose shared and unceded traditional territories our office is located.*

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**From:** Drummond Lambert <[dlambert@eyfordpartners.com](mailto:dlambert@eyfordpartners.com)>  
**Sent:** Tuesday, April 8, 2025 11:49 AM  
**To:** Cole Rodocker <[crocker@hamiltonduncan.com](mailto:crocker@hamiltonduncan.com)>  
**Subject:** Lares v. van der Heyden

Cole:

I received your voicemail on this earlier today. 2:00pm or after 4:00pm today would work. Please let me know if anytime in there works and we'll call your cell phone then.

Regards,

Drummond

**Drummond Lambert**  
 Associate

t: 604 899 5205  
 f: 604 899 5216

Email: [dlambert@eyfordpartners.com](mailto:dlambert@eyfordpartners.com)

**EYFORD**  
 PARTNERS

**Eyford Partners LLP**  
 1744 - 1056 Dunsmuir Street, PO Box 49254  
 Vancouver, BC V7X 1L2, Reception: 604 899 5240

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**EYFORD**  
PARTNERS

DRUMMOND LAMBERT  
DIRECT: 804.899.5205  
DLAMBERT@EYFORDPARTNERS.COM

14 April 2025

FILE NO.: 10650-001

VIA E-MAIL: [rmorton@mcquarrie.com](mailto:rmorton@mcquarrie.com)

McQuarrie Hunter LLP  
Suite 1500, 13450 102 Avenue  
Surrey, BC V3T 5X3

**Attention: Royal Morton**

Dear Mr. Morton:


**RE: *Lares, Michael v. van der Heyden, et al.***  
**SCBC Vancouver Action No. S248901**

We write further to your office's email of 11 April 2025 advising Cole Rodocker is no longer acting as your independent counsel in regard to the upcoming disqualification application.

We are of the view that there is increasing urgency to the matter at hand and that application must proceed promptly.

Our client recently received a communication from CRA (enclosed) regarding the insurability and pensionability of Lara Lares' work with the Company. Of course, our client understood the Company had no employees and is concerned to learn of a CRA investigation into this matter.

Additionally, based on your letter of 24 March 2025, we understand the Company has no form of property or commercial general liability insurance, despite it operating as a ranch and Mr. Lares apparently allowing individuals to hunt on the 160 and 80 Acres.

This is Exhibit " H " referred to in the  
Affidavit of Michelle El  
sworn (or affirmed) before me at  
Vancouver, B.C.  
this 06 day of May 2025.  
  
A Commissioner for Taking Affidavits  
within British Columbia

EYFORD PARTNERS LLP  
eyfordpartners.com

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207-3500 Carrington Road  
West Kelowna, BC V4T 3C1  
P: 778 754 0285 F: 778 754 0287

- 2 -

In the circumstances, given the parties' agreement that the Company ought to be wound up (presumably by a share sale), we are of the view that the scheduling of the petition in this matter ought to proceed at the earliest opportunity.

Before the petitioner can proceed, however, the disqualification application must be heard.

Given the urgency of the matter at hand and your office's opportunity to speak with Mr. Rodocker about this matter, we intend to proceed with the disqualification application on 13 May 2025. Please advise the second independent counsel of our intention to proceed on that date.

Yours truly,

EYFORD PARTNERS LLP

Per: 

Drummond Lambert

DL/ms  
Encls.

# CPP/EI - contact request

---

 PDF

FLYING "L" RANCH LTD.

PO BOX 10 NEMAH VALLEY BC V0L 1X0 April 3, 2025 Account

Number 78948 8533 RP0001 Reference Number CE2508 6123 0309

Dear representative of Flying "L" Ranch Ltd.: **Subject: Canada Pension Plan and Employment Insurance rulings**

We are writing to notify you that we have received a request to determine the insurability and pensionability of Lara Lares' work with Flying "L" Ranch Ltd. I am the agent assigned to your file and I will contact you at 250-302-2989 to discuss the working situation. If you want me to reach you at a different number, let me know by calling 236-334-1332 or toll-free at 1-877-396-7711. When we call, we may ask for proof of payment, copies of contracts, and other documents. We encourage you to register for My Business Account, if you have not done so. Use it to update your information, send and receive documents electronically, and more. To register and for more information, go to [canada.ca/my-cra-business-account](https://canada.ca/my-cra-business-account).

For information on Canada Pension Plan and employment insurance rulings, go to [canada.ca/cpp-ei-rulings](https://canada.ca/cpp-ei-rulings).

Sincerely, Digitally signed by, G. Yu  
CPP/EI Rulings Officer 468 TA-039755 King  
George Boulevard Surrey BC V3T 5E1  
Toll-Free: 1-877-396-7711 Fax:  
604-658-8777  
canada.ca/taxes

Screen ID: MBA-CC-02

Version: 2025-03-31 2:20:17 p.m. (25.02.8-RELEASE)

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Associate Lawyer: Benjamin P. Morley  
E-Mail: bmorley@mcquarrie.com

Legal Administrative Assistant: Barbara Poth  
E-Mail: bpoth@mcquarrie.com  
Direct Line: 604-680-7081

Our File No.: 240948

April 17, 2025

VIA EMAIL [dlambert@eyfordpartners.com](mailto:dlambert@eyfordpartners.com)

Eyford Partners LLP  
1744-1055 Dunsmuir Street  
Vancouver, BC V7X 1L2

Attention: Drummond Lambert

Dear Sir:

Re: **Michael Lares v. Peter van der Heyden et al**  
**SCBC Vancouver Action no. S248901 ("Oppression Proceeding")**  
**Michael Lares v. Devyn McMillan et al**  
**SCBC New Westminster Registry Action No. S257137 ("Defamation Action")**  
**Peter van der Heyden v. Michael Lares**  
**SCBC Vancouver Registry Action No. S243219 (the "Van der Heyden Action").**

This is Exhibit " I " referred to in the  
Affidavit of Michelle El  
sworn (or affirmed) before me at  
Vancouver, B.C.  
this 06 day of May, 2025.

  
A Commissioner for Taking Affidavits  
within British Columbia

Further to your letter dated March 18, 2025, our client has been in touch with the Ministry and has advised that there was some inaccurate information in the beneficial use declaration form. Mr. Lares has now updated the form based on his conversation with water authorizations specialist, Marie MacCallum. A copy of the signed, updated form is enclosed for Mr. van der Heyden's review, execution, and return to our office for delivery to the Ministry.

In follow-up to my email of April 11<sup>th</sup> and your letter dated April 14<sup>th</sup>, we are in the process of engaging Ms. Corry Clark of Fasken Martineau DuMoulin LLP concerning the upcoming disqualification application. Ms. Clark has advised us that she is available on May 13<sup>th</sup>, but that she will need to review your application material to provide a time estimate for the hearing.

We see no sudden urgency to Mr. van der Heyden's application. The CRA request for information, apparently prompted by your client, does not change our assessment concerning the lack of urgency. Ms. Lares is engaged with the company as an independent contractor, as confirmed by the CRA ruling dated April 17, 2025, which is enclosed.

Yours truly,

MCQUARRIE HUNTER LLP

  
BENJAMIN P. MORLEY

Associate

/b/p  
Ends.



CPP/EI Ružaga, VST 681

**FLYING "L" RANCH LTD.  
PO BOX 10  
NEMAH VALLEY BC V0L 1X0**

April 17, 2025

**Account Number  
78948 8533 RP0001**

**Reference Number  
CE2508 6123 0309**

Dear representative of Flying "L" Ranch Ltd.:

**Subject: Employment Insurance (EI) and Canada Pension Plan (CPP) rulings  
Ruling number: CE2509 2125 8217**

We received a request for a ruling on the insurability and pensionability of Lara Lares' employment with Flying "L" Ranch Ltd. from January 1, 2023 to April 10, 2025. This request originates from the CPP Contributors Program in the Employer Services Section at the Canada Revenue Agency.

#### **Decision(s)**

We have ruled that, for the period under review, Lara Lares was a self-employed worker and the services were not insurable or pensionable.

#### **Explanation**

When we examined whether Lara Lares was an employee or a self-employed individual, we looked to see if she was engaged to carry out services as an employee or as a person in business on her own account.

The first thing we looked at was the intent with respect to the working relationship. In other words, did you intend to have an employer-employee relationship or did you intend to have a business relationship? We then examined the actual terms and conditions of the working relationship to see if they reflected the intent.

We looked at the following:

- the level of control Flying "L" Ranch Ltd. had over the worker's activities
- whether the worker provided the tools and equipment
- whether the worker could subcontract the work or hire assistants
- the degree of financial risk the worker took
- the degree of responsibility for investment and management the worker held
- the worker's opportunity for profit
- any other relevant factors, such as written contracts

Based on these factors, we determined she was a self-employed worker.

#### **For more information**

For more information on how we determine whether a worker is an employee or a self-employed individual, go to [canada.ca/cra-forms](https://canada.ca/cra-forms) and read Guide RC4110, Employee or Self-employed?

**Canada**

If you have questions about how these rulings could affect you, go to [canada.ca/cpp-ei-rulings](http://canada.ca/cpp-ei-rulings) and select "Have you received a CPP/EI ruling?" or call 1-800-959-8525.

**If you disagree**

We based these rulings on the information we received and they apply only to the period under review. If the working conditions change significantly, you should ask for a new ruling.

If you disagree with one or both of the rulings, you have 90 days from the date of this letter to appeal. You can do it in two ways:

- Online: Go to [canada.ca/my-cra-business-account](http://canada.ca/my-cra-business-account). If you are a level 2 or 3 representative, go to [canada.ca/taxes-representatives](http://canada.ca/taxes-representatives). Select "Register a formal dispute (Appeal)". To send supporting documents, select "Submit documents".

- In writing: Fill out Form CPT100, Appeal of a Ruling Under the Canada Pension Plan and/or Employment Insurance Act, or write a letter to the Chief of Appeals and send it to:

CPP/EI Appeals Division  
Canada Revenue Agency  
451 Talbot St  
London ON N6A 5E5  
Fax: 1-888-287-7800

**To contact me**

If you have questions about these rulings or want a copy of the ruling report, call me at 236-334-1332. We accept collect calls.

Sincerely,  
Digitally signed by,

G. Yu  
CPP/EI Rulings Officer  
468 TA-03  
9755 King George Boulevard  
Surrey BC V3T 5E1  
Toll-Free: 1-877-388-7711  
Fax: 604-658-8777



**Beneficial Use Declaration**  
 Direction & Order To Submit Declaration  
 Section 30 (2) of the *Water Sustainability Act*

**Section 1: For office use only**

Ministry of Water, Land and Resource Stewardship  
 c/o Marie McCallum  
 400-640 Borland St  
 Williams Lake, BC V2G 4T1  
 marie.mccallum@gov.bc.ca | 250-302-4287

Water Licence No.:	C063369	File Number:	0365308
Client Name:	Flying "L" Ranch Ltd.		
Address:	PO Box 10, Nemiah Valley, BC V0L 1X0		
Source:	Billy Goat Creek	PID:	011-225-661
The above water licence is appurtenant to the land with the legal description of: <b>DISTRICT LOT 383 RANGE 2 COAST DISTRICT</b>			

**Section 2: To be completed by licensee or landowner diverting or using water**

**Instructions**

1. Review the water licence that was attached to your cover letter.
2. Complete Section A and attach to this form and any additional information that has been requested in the cover letter.
3. Sign the declaration under Section B and return this form by mail or email to the address above within 30 days from the date you are deemed to have received the cover letter and this form.<sup>1</sup>

Please be advised that failing to submit this declaration, as directed by this order, within the time specified above, may result in a portion of the rights under the licence being considered for possible suspension or cancellation proceedings.

**SECTION A - DECLARATION OF USE**

In the 3 years preceding the date of this declaration, have you made beneficial use of the quantity of water (in-part or in- full), authorized to be diverted under the licence?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If you answered "no" please explain in the 'comments box' below:
In the 3 years preceding the date of this declaration, have you complied with all of the terms and conditions of the licence?	<input type="checkbox"/> Yes <input type="checkbox"/> No If you answered "no" please explain in the 'comments box' below:
<b>Comments</b>	
THE SYSTEM WAS NEVER BUILT AND/OR PUT ONLINE THE LICENCE EXISTED WHEN THE LOT WAS PURCHASED	
<b>WATER USE PURPOSES</b> Section 2 of the <i>Water Sustainability Act</i> (WSA) and Schedule A of the <i>Water Sustainability Regulation</i> provide definitions, descriptions and additional information on water use purposes.	

<sup>1</sup> Section 117(2) *Water Sustainability Act* describes how the Province determines when something is deemed to be delivered.

**Please select the purpose(s) for which you are using water under the licence, as applicable.**

<input type="checkbox"/> <b>Domestic:</b> Dwellings, Buildings, garden (Less than 1,000 m <sup>2</sup> )	<input type="checkbox"/> <b>Irrigation</b> Watering of crops	<input type="checkbox"/> <b>Storage</b> Retaining water for use at a another time	<input type="checkbox"/> <b>Industrial Stock Watering</b> Watering livestock
<input type="checkbox"/> <b>Industrial Garden/Lawn Watering</b> Garden/field/lawn over 1,000 m <sup>2</sup>	<input type="checkbox"/> <b>Mining</b> Recovering minerals from the ground	<input type="checkbox"/> <b>Power</b> Generating electricity	<input type="checkbox"/> <b>Waterworks</b> Delivering water to other persons

**Please describe other purposes for which you are using water under this licence:**

**Other:**

**QUANTITY OF WATER USED:**  
Please indicate the amount of water by [measurement OR estimate] (circle one) that you are using under the licence for each purpose:

Water use Purpose	Water amount	Units (circle one)	Time period (circle one)
		Cubic metres / acre feet / gallons / litres	second / day / year
		Cubic metres / acre feet / gallons / litres	second / day / year
		Cubic metres / acre feet / gallons / litres	second / day / year

**OR**

**If you do not know the amount of water you are using, please provide further information about your water use:**

Number of dwellings being serviced		List building types or descriptions	
Number of acres being irrigated/watered:		Number & type of livestock being supplied:	
Quantity of water stored:		Size of Pond / Reservoir:	

Please provide any other information you can provide that might inform a water use determination.

**SECTION A-1 – Additional information about your works**

**CONSTRUCTED WORKS**  
Commonly constructed works include an intake, pump, pipe, diversion structure, sprinklers, ditch, trough, pond, dam, reservoir, or a storage tank, but may include any component used to divert, use or store water under the licence. Please list all works in use in sections below.

**Answer the following questions concerning the authorized works listed in the licence:**

Are the works listed in the licence constructed?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Partially
Are the works listed in the licence in use?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Partially

**Comments:**

Describe any additional works that were constructed (not listed in the licence):

Type of work	Is the work in use?		Are the works on private land or on Crown (public) land?	
	Yes	No	Private	Crown
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Permissions**  
 A licensee requires permission to occupy the land where his or her works are located.

If any of your works are located on Crown land or private property that you do not own, please describe the permissions you have to occupy the land and attach any copies of the agreements to this form, if available. These permissions might include a lease, easement, statutory right of way or Crown land tenure.

N/A

---

**Decommissioning and removal of works**

If works were constructed and are no longer in use, please indicate whether the works were decommissioned and/or removed. If not, please advise as to your plans to decommission and/or remove works that are no longer in use:

N/A

---

**Drawing / Plan of your works**

Please provide a drawing / plan showing the current location of all works and the place of use. Two simple ways to complete this task include:

- Using iMapBC (available online through a search engine) to generate a map of your property or undertaking. Tutorials for learning iMapBC are available online.
- Drawing over the surveyed plan or water licence map that was included with your cover letter.

The drawing should identify at a minimum the water source, point of diversion (intake), all constructed works, property boundaries, dwellings.

**SECTION A-2 – Additional information about water use on your property.**

**DO YOU HAVE OTHER WATER LICENCES THAT SERVICE YOUR PROPERTY?**  Yes  No

If yes:

Licence no.	_____	Source	_____
Licence no.	_____	Source	_____
Licence no.	_____	Source	_____

**DO YOU HAVE OTHER SOURCES OF WATER SUPPLY THAT ARE USED TO SERVICE YOUR PROPERTY?**

None  Groundwater (including domestic well)<sup>2</sup>  Other ROBERTSON WELLS AND

NEMAH RIVER RUN THROUGH THE PROPERTY. WILL BE ADDRESSING THIS PROPOSED USE IN A SEPARATE APPLICATION.

<sup>2</sup> Use of groundwater for domestic purpose only does not require a licence but registration of your well is strongly encouraged. Your help in registering your well will assist in making better informed groundwater allocation decisions in your area. For more information or assistance on well registration email [FrontCounterBC@env.gov.bc.ca](mailto:FrontCounterBC@env.gov.bc.ca) or phone toll free 1-877-858-3222.

Use of groundwater for a non-domestic purpose now requires a water licence as a new requirement under the Water Sustainability Act. For groundwater use existing on February 29, 2016, an application for non-domestic use of groundwater must be submitted on or before March 1, 2022 to be in compliance with the law. For new groundwater diversions, an authorization is required prior to commencing use. Visit [www.FrontCounterBC.ca](http://www.FrontCounterBC.ca) to apply.

**SECTION B - SIGNATURES**

Your signature and the signatures of anyone else whose name is on your land title for appurtenant land, described in your water licence, are required below.

I hereby declare that the information contained in this Declaration is true to the best of my knowledge, information and belief.

Name (Owner 1): MICHAEL D. LARES *Michael D. Lares* APRIL 2, 2025  
(Print Name) (Signature) (Date)

Address: Box 10 NEMAH VALLEY B.C. VOL-1X0

Phone Number: 250-302-2989 Email: MICHAEL@ELMOKL RANCH.CA

I hereby declare that the information contained in this Declaration is true to the best of my knowledge, information and belief.

Name (Owner 2): \_\_\_\_\_  
(Print Name) (Signature) (Date)

Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_ Email: \_\_\_\_\_

I hereby declare that the information contained in this Declaration is true to the best of my knowledge, information and belief.

Name (Owner 3): \_\_\_\_\_  
(Print Name) (Signature) (Date)

Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_ Email: \_\_\_\_\_

I hereby declare that the information contained in this Declaration is true to the best of my knowledge, information and belief.

Name (Owner 4): \_\_\_\_\_  
(Print Name) (Signature) (Date)

Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_ Email: \_\_\_\_\_

Please provide below any further information that you consider to be relevant:

I MICHAEL LARES PER MY DISCUSSIONS WITH MARIE MCCALUM  
AM SUBMITTING THIS REQUEST TO CLOSE OUT THIS WATER  
USE LICENSE AND WILL BE APPLYING IN ANOTHER  
APPLICATION PROCESS FOR ANY PROPOSED WATER USE. THIS  
WAS DISCUSSED BEFORE THE 30 DAY EXPIRATION OF RECEIPT  
OF THE NOTICE.

*Michael D. Lares*

**Drummond Lambert**

**From:** Drummond Lambert  
**Sent:** Wednesday, April 30, 2025 3:06 PM  
**To:** Corry Clark  
**Cc:** Nicole Cutler; Lucy Sun; Douglas Eyford; Michelle El  
**Subject:** RE: Michael Lares v. Peter van der Hayden et al - McQuarrie Hunter  
**Attachments:** RE: Lares v. van der Heyden

Corry:

We are agreeable to proceeding on 20 May 2025 and will serve our materials in due course.

I'm quite flexible on Friday, so please let me know a time that works for you and we can set up a call for then. I've attached our email to McQuarrie's former counsel which overviews our position on this matter.

I note there is the continuing need to issue correspondence regarding Company matters for the time being. I will direct these inquiries to you for the time being until this conflict issue is resolved.

Best regards,

Drummond

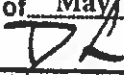
Drummond Lambert  
 Associate

c: 604 899 5205  
 f: 604 899 5216

Email: [dlambert@eyfordpartners.com](mailto:dlambert@eyfordpartners.com)

**EYFORD**  
 PARTNERS

Eyford Partners LLP  
 1744 – 1055 Dunsmuir Street, PO Box 49254  
 Vancouver, BC V7X 1L2, Reception: 604 899 5240

This is Exhibit "J" referred to in the  
 Affidavit of Michelle El  
 sworn (or affirmed) before me at  
Vancouver, B.C.  
 this 06 day of May 2025.  
  
 A Commissioner for Taking Affidavits  
 within British Columbia

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**From:** Corry Clark <cclark@fasken.com>  
**Sent:** Tuesday, April 29, 2025 7:53 AM  
**To:** Drummond Lambert <dlambert@eyfordpartners.com>  
**Cc:** Nicole Cutler <ncutler@fasken.com>; Lucy Sun <lsun@fasken.com>  
**Subject:** Michael Lares v. Peter van der Hayden et al - McQuarrie Hunter

Drummond:

My name is Corry Clark. We have been retained by McQuarrie Hunter with respect to your client's application to disqualify that firm as counsel.

I understand you may wish to proceed with this application on May 13, 2025. While I am technically still available on that date, other court commitments have arisen which will make it very challenging for me to prepare my materials in a timely way, assuming you deliver your materials today.

Can we schedule the application for the week of May 20, 2025, if you plan to proceed? I will still need to assess whether the application can be done in regular chambers once I receive your materials.

Please feel free to call me to discuss these matters.

Corry

**Corry A. Clark\***

Partner

T +1 604 631 4795

cclark@fasken.com | [www.fasken.com/en/corry-clark](http://www.fasken.com/en/corry-clark)

**FASKEN**

**Fasken Martineau Duffoulin LLP**

13401 - 108th Avenue, Suite 1800, Surrey, British Columbia V3T 5T3

\*Law Corporation

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DRUMMOND LAMBERT  
DIRECT: 604.899.6205  
DLAMBERT@EYFORDPARTNERS.COM


05 May 2025

FILE NO.: 10650-001

VIA E-MAIL: [ccclark@fasken.com](mailto:ccclark@fasken.com)

Fasken Martineau DuMoulin LLP  
1800-13401 108 Avenue  
Surrey, BC V3T 5X3

Attention: Corry Clark

This is Exhibit " K " referred to in the  
Affidavit of Michelle El  
sworn (or affirmed) before me at  
Vancouver, B.C.  
this 06 day of May 2025.  
  
A Commissioner for Taking Affidavits  
within British Columbia

Dear Ms. Clark:

**RE: Lares, Michael v. van der Heyden, et al.**  
**SCBC Vancouver Action No. S248901**

Given that you are independent counsel for McQuarrie Hunter LLP in regard to this matter, we are addressing corporate correspondence to your attention for the time being. Please ensure these matters are brought to the attention of Mr. Lares.

**I. ATTENDANCE AT PROPERTY**

We have spoken with our client and confirmed he will not be attending the ranch tomorrow (06 May 2025).

**II. INSURANCE**

Mr. Morton's previous letter has implied that, because the directors had never discussed insurance previously, that has provided Mr. Lares a *carte blanche* to conduct Company affairs without any insurance. Mr. van der Heyden disagrees with this assertion. He did not know previously that no form of insurance exists related to the Company, the 160 Acres, or the 80 Acres.

Mr. van der Heyden is inquiring with Westland Insurance about obtaining liability insurance for the Company. Given the nature of the Company's operations, it is of the utmost importance that the Company obtain appropriate insurance. We have attached as Appendix 'A' a series of inquiries from Westland Insurance which we are

EYFORD PARTNERS LLP  
[eyfordpartners.com](http://eyfordpartners.com)

☒ 1744 - 1055 Dunsmuir Street  
PO Box 49254  
Vancouver, BC V7X1L2  
P: 604 899 5240 F: 604 899 5218

☐ 207—3500 Carrington Road  
West Kelowna, BC V4T3C1  
P: 778 754 0285 F: 778 754 0287

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hoping to return to them so we can obtain a quote for commercial general liability insurance.

In the meantime, given Mr. van der Heyden's potential exposure to liability as the owner of the 80 Acres, please be advised he cannot consent to anyone entering or passing through the 80 Acres, nor does he consent to any Company activities occurring there.

Please confirm Mr. Lares acknowledges the above and provide responses to Westland's inquiries in due course.

### III. THE CRA INVESTIGATION

We can advise that the CRA officer who contacted Mr. van der Heyden (Mr. Yu) told him that the investigation was instigated internally by the CPP/EI department.

Please provide all documentation, including contracts and statements of remuneration, concerning the engagement of Lara Lares as a Company contractor. Our client had no knowledge such had occurred and is seriously concerned about Mr. Lares engaging his own family members in such a manner.

If any other family members of Mr. Lares are engaged as Company contractors, we likewise demand production of such records as well. In that regard, we note the frequent payments out of the Company's account to them.

### IV. COMPANY ASSETS

Further to Mr. Morton's letter of 24 March 2025, we confirm Mr. Lares will not be selling anything outside the Company's ordinary course of business. Per your letter, we further confirm the Company's major assets include but are not limited to:

- backhoe, tractor, hay rake, hay mover, and two balers;
- donated camera equipment;
- horse trailer;
- snow machine;
- two snowmobiles;
- tack and storage building; and
- tools and miscellaneous support equipment.

- 3 -

**V. BENEFICIAL USE DECLARATION FORM**

Please find enclosed a copy of the beneficial use declaration form submitted by Mr. van der Heyden to Marie McCallum on 19 April 2025. Please ensure any future water use licences involving the Company or the 80 Acres are brought to Mr. van der Heyden's attention before submission to the Ministry.

**VI. MR. VAN DER HEYDEN'S COMPANY RBC CARD**

RBC bank has confirmed that Mr. van der Heyden's Company debit card was sent to the ranch. Please deliver that debit card to our office at your earliest opportunity.

Yours truly,

EYFORD PARTNERS LLP

Per:



Drummond Lambert

DL/me  
Encls.

**Appendix 'A': Westland Insurance Inquiries**

- Detailed description of business operations:
  - *Westland's proposed description: 30-35 horses used for media content, social media. Hay sales. Merchandising. Sell one or two horses per year. Two cabins rented out. Video content and then posting it on Instagram and getting donations to run the farm. Runs an exclusive online channel for watching horses in nature that you can buy a subscription.*
- What year did your business start?
- How many years of experience does the operator have?
- How many employees does the Company have – full-time and part-time?
- What is the annual payroll?
- Do you sub-contract any work out? If so, what is the percentage?
- Annual Gross revenue broken down by activity:
  - Horse sales:
  - Donations collected:
  - Content subscription sales:
  - Cabin rental sales:
  - Other (please describe):