



This is the 2nd Affidavit
of Bat-Sheva Levy in this case and
was made on the 3 day of December, 2024

District of: British Columbia
Division No.: 03 – Vancouver
Court No.: B-240536
Estate No.: 11-3149370

**IN THE SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY AND INSOLVENCY**

**IN THE MATTER OF THE NOTICE OF INTENTION
TO MAKE A PROPOSAL OF
LAMBDA SOLUTIONS INC.**

AFFIDAVIT

I, Bat-Sheva Levy, businesswoman, c/o Reedman Law, #800a-1030 West Georgia St., Vancouver, BC, businesswoman, AFFIRM THAT:

1. I am the CEO and director of Lambda Solutions Inc. ("**Lambda**" or the "**Company**"). As such, and on the basis of information provided to me by management and staff of the Company, I have knowledge of the facts and matters hereinafter deposed to, and where information has been provided by others, I verily believe such information to be true.

2. I make this affidavit as a supplement to my previous affidavit in this matter, filed November 22, 2024, and to provide further information concerning the operations and finances of Lambda.

Recent Payments to Evergreen and Firepower

3. Attached hereto as **Exhibit "A"** is a copy of a general ledger report pertaining to Lambda's indebtedness to Evergreen GAP Debt GP ("**Evergreen**") from January 1, 2024 to November 27, 2024 (the "**Transaction Report**").

4. The Transaction Report shows two significant payments made by Lambda to Evergreen in October of 2024, shortly before filing its Notice of Intention:

(a) \$200,000 on October 9, 2024; and

(b) \$100,000 on October 17, 2024

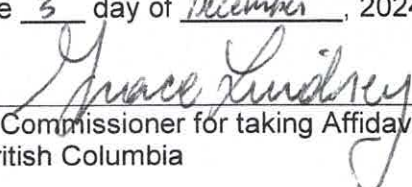
(the "**October Payments**").

5. Attached hereto as **Exhibit "B"** are copies of Lambda's bank statements for its RBC account, numbered 6550-1016237 from November 1, 2023, to November 1, 2024, showing various recent payments made to Evergreen and Firepower GAP Debt II LP ("**Firepower**"), including the October Payments.

Litigation with Moodle PTY Ltd

6. Since in or around May of 2024, Lambda has been engaged in litigation against Moodle PTY Ltd ("**Moodle**") in Western Australia (the "**Moodle Action**").
7. In order to defend the Moodle Action, Lambda was paying AUD\$12,000 per month throughout 2024 to Gilbert+Tobin LLP ("**Gilbert+Tobin**"), its counsel located in Western Australia, for legal fees (the "**Legal Fees**").
8. Attached hereto as **Exhibit "C"** are wire payment details from Lambda to Gilbert+Tobin pursuant to the Legal Fees for October of 2024.
9. As of November 1, 2024, the date of filing its Notice of Intention, Lambda has taken the position that the Moodle Action is stayed by the stay of proceedings in effect in British Columbia.
10. As of November 1, 2024, Lambda has ceased making payments pertaining to legal fees from the Moodle Action.

AFFIRMED BEFORE ME at City of
Vancouver, Province of British Columbia, on
the 3 day of December, 2024

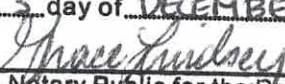

A Commissioner for taking Affidavits for
British Columbia


BAT-SHEVA LEVY

GRACE LINDSEY
Barrister & Solicitor
REEDMAN LAW
#800-1030 WEST GEORGIA STREET
VANCOUVER B.C. V6E 2Y3
TEL: 604-570-0005 FAX: 604-688-1619

Lambda Solutions Inc.
Transaction Report
January - December 2024

Date	Account	Amount	Balance
Loans			
Evergreen			
2611 Evergreen Gap Debt GP Inc.			
Beginning Balance			2,160,272.37
2024-02-08	2611 Loans:Evergreen:Evergreen Gap Deb	31,000.00	2,191,272.37
2024-02-29	2611 Loans:Evergreen:Evergreen Gap Deb	-399,235.19	1,792,037.18
2024-03-28	2611 Loans:Evergreen:Evergreen Gap Deb	17,800.00	1,809,837.18
2024-05-21	2611 Loans:Evergreen:Evergreen Gap Deb	-55,000.00	1,754,837.18
2024-07-09	2611 Loans:Evergreen:Evergreen Gap Deb	-100,000.00	1,654,837.18
2024-07-31	2611 Loans:Evergreen:Evergreen Gap Deb	22,089.38	1,676,926.56
2024-10-09	2611 Loans:Evergreen:Evergreen Gap Deb	-200,000.00	1,476,926.56
2024-10-17	2611 Loans:Evergreen:Evergreen Gap Deb	-100,000.00	1,376,926.56
Total for 2611 Evergreen Gap Debt GP Inc.		-\$783,345.81	

This is Exhibit " A " referred to in the
Affidavit of BAT-SHEVA LEVY
sworn (or affirmed) before me at
VANCOUVER, B.C.
this 3 day of DECEMBER 2024.

A Notary Public for the Province of
British Columbia

GRACE LINDSEY
Barrister & Solicitor
REEDMAN LAW
#800-1030 WEST GEORGIA STREET
VANCOUVER B.C. V6E 2Y3
TEL: 604-570-0005 FAX: 604-688-1619

AL Amount cash sent to FP

-399,235.19

-55,000.00

-100,000.00

-200,000.00

-100,000.00

-\$854,235.19



Royal Bank

6550-1016237 CAD (6237)

This is Exhibit "B" referred to in the
Affidavit of BAT-SHEVA LEVY
sworn (or affirmed) before me at
VANCOUVER, B.C.
this 3 day of DECEMBER 2024.

Grace Lindsey
A Notary Public for the Province of
British Columbia



LAMBDA SOLUTIONS INC

Dec 2, 2024

Current Account (6237)

Current Balance: Available Balance:
\$4,180.36 \$4,180.36

Authorized Overdraft:
\$0.00

GRACE LINDSEY
Barrister & Solicitor
REEDMAN LAW
#800-1030 WEST GEORGIA STREET
VANCOUVER B.C. V6E 2Y3
TEL: 604-570-0005 FAX: 604-688-1619

Transactions From Dec 2, 2017 to Dec 2, 2024

DESCRIPTION	WITHDRAWALS	DEPOSITS	BALANCE
Nov 1, 2024			\$7,288.25
Misc Payment Firepower Asset PAPS <DEFTPYMT>	-\$12,664.18		
Oct 17, 2024			\$167,409.75
Misc Payment Firepower Asset PAPS <DEFTPYMT>	-\$100,000.00		
Oct 9, 2024			\$18,650.39
Misc Payment Firepower Asset PAPS <DEFTPYMT>	-\$200,000.00		
Oct 1, 2024			\$109,537.31
Misc Payment Firepower Asset PAPS <DEFTPYMT>	-\$13,782.96		
Sep 3, 2024			\$47,054.81
Misc Payment Firepower Asset PAPS <DEFTPYMT>	-\$14,242.39		

Manage Business
Better With Cash
Flow Tool

[Check Now](#)

Interac e-
Transfer®
Request Money

Request payments from
clients - no paper
required.

[Find out How](#)

Jul 31, 2024	\$37,434.47
Misc Payment	-\$14,488.97
Firepower Asset	
PAPS <DEFTPYMT>	
Jul 9, 2024	\$19,557.53
Misc Payment	-\$100,000.00
Firepower Asset	
PAPS <DEFTPYMT>	
Jul 2, 2024	\$224,828.41
Misc Payment	-\$14,604.88
Firepower Asset	
PAPS <DEFTPYMT>	
May 31, 2024	\$27,334.38
Misc Payment	-\$15,281.05
Firepower Asset	
PAPS <DEFTPYMT>	
May 21, 2024	\$102,322.91
Misc Payment	-\$55,000.00
Firepower Asset	
PAPS <DEFTPYMT>	
Apr 30, 2024	\$54,571.23
Misc Payment	-\$14,875.37
Firepower Asset	
PAPS <DEFTPYMT>	
Feb 29, 2024	\$4,020.13
Misc Payment	-\$527,000.00
FIREPOWER DEBT	
Dec 18, 2023	\$2,172.60
Misc Payment	-\$23,944.46
FIREPOWER DEBT	
Dec 1, 2023	\$20,365.32
Misc Payment	-\$23,944.46
FIREPOWER DEBT	
Nov 1, 2023	\$147,484.42
Misc Payment	-\$24,742.61
FIREPOWER DEBT	

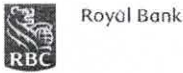
Sep 29, 2023		\$151,447.39
Misc Payment	-\$23,944.46	
FIREPOWER DEBT		
Aug 31, 2023		\$123,199.54
Misc Payment	-\$24,742.61	
FIREPOWER DEBT		
Jul 31, 2023		\$100,395.15
Misc Payment	-\$24,742.61	
FIREPOWER DEBT		
Jun 30, 2023		\$56,204.37
Misc Payment	-\$23,944.46	
FIREPOWER DEBT		
May 31, 2023		\$252,380.37
Misc Payment	-\$27,721.79	
FIREPOWER DEBT		
May 2, 2023		\$45,007.12
Misc Payment	-\$27,668.43	
FIREPOWER DEBT		
Mar 31, 2023		\$110,370.44
Misc Payment	-\$28,590.71	
FIREPOWER DEBT		
Feb 28, 2023		\$57,458.05
Misc Payment	-\$72,556.54	
FIREPOWER DEBT		
Jan 31, 2023		\$193,686.57
Misc Payment	-\$29,077.25	
FIREPOWER DEBT		
Jan 3, 2023		\$86,062.64
Misc Payment	-\$29,077.25	
FIREPOWER DEBT		
Dec 19, 2022		\$140,051.42
Misc Payment	-\$28,139.27	
FIREPOWER DEBT		

Nov 8, 2022		\$49,697.38
Misc Payment	-\$29,077.25	
FIREPOWER DEBT		
Oct 3, 2022		\$114,636.05
Misc Payment	-\$28,139.27	
FIREPOWER DEBT		
Aug 31, 2022		\$238,487.08
Misc Payment	-\$99,376.90	
FIREPOWER DEBT		
Aug 1, 2022		\$208,803.18
Misc Payment	-\$100,232.12	
FIREPOWER DEBT		
Jul 4, 2022		\$23,573.49
Misc Payment	-\$29,794.52	
FIREPOWER DEBT		
May 31, 2022		\$234,822.89
Misc Payment	-\$30,787.67	
FIREPOWER DEBT		
May 2, 2022		\$452,692.78
Misc Payment	-\$29,794.52	
FIREPOWER DEBT		
Mar 31, 2022		\$65,340.69
Misc Payment	-\$30,787.67	
FIREPOWER DEBT		
Mar 4, 2022		\$103,192.90
Misc Payment	-\$27,808.22	
FIREPOWER DEBT		
Feb 3, 2022		\$157,776.76
Misc Payment	-\$30,787.67	
FIREPOWER DEBT		
Dec 31, 2021		\$57,482.34
Misc Payment	-\$30,787.67	
FIREPOWER DEBT		

Nov 30, 2021		\$26,167.62
Misc Payment	-\$29,794.52	
FIREPOWER DEBT		
Nov 1, 2021		\$101,342.60
Misc Payment	-\$30,787.67	
FIREPOWER DEBT		
Oct 4, 2021		\$136,433.47
Misc Payment	-\$29,794.52	
FIREPOWER DEBT		
Aug 31, 2021		\$238,384.28
Misc Payment	-\$30,787.67	
FIREPOWER DEBT		
Aug 2, 2021		\$86,597.29
Misc Payment	-\$30,787.67	
FIREPOWER DEBT		
Jun 30, 2021		\$152,310.79
Misc Payment	-\$29,794.52	
FIREPOWER DEBT		
May 31, 2021		\$208,408.84
Misc Payment	-\$30,787.67	
FIREPOWER DEBT		
Apr 30, 2021		\$219,889.26
Misc Payment	-\$29,794.52	
FIREPOWER DEBT		
Mar 31, 2021		\$108,666.95
Misc Payment	-\$30,787.67	
FIREPOWER DEBT		
Mar 1, 2021		\$149,255.64
Misc Payment	-\$27,808.22	
FIREPOWER DEBT		
Feb 1, 2021		\$229,903.49
Misc Payment	-\$38,732.88	
FIREPOWER DEBT		

Showing 48 of 48 transactions

Royal Bank of Canada Website, © 1995-2024



6550-1016237 CAD (6237)

Current Account (6237)

Current Balance:

\$4,180.36

Available Balance:

\$4,180.36

Authorized Overdraft:

\$0.00

Transactions From Dec 2, 2017 to Dec 2, 2024

DESCRIPTION	WITHDRAWALS	DEPOSITS	BALANCE
Mar 28, 2024			\$101,364.11
Funds transfer fee TT EVERGREEN GA	-\$17.00		
Funds transfer credit TT EVERGREEN GA		\$17,800.00	
Feb 8, 2024			\$2,837.15
Web payment EVERGREEN GAP L		\$31,000.00	
May 24, 2023			\$350,901.19
Funds transfer EVERGREEN GAP D	-\$312,515.96		

Showing 4 of 4 transactions

Manage Business
Better With Cash
Flow Tool

Check Now

Interac e-
Transfer®
Request Money

Request payments from
clients - no paper
required.

Find out How



GRACE LINDSEY
Barrister & Solicitor
REEDMAN LAW
#800-1030 WEST GEORGIA STREET
VANCOUVER B.C. V6E 2Y3
Tel: 604-570-0005 FAX: 604-688-1619



LAMBDA SOLUTIONS INC.

This is Exhibit "C" referred to in the
Affidavit of BAT-SHEVA LEVY
sworn (or affirmed) before me at
VANCOUVER, B.C.
this 3 day of DECEMBER, 2024.

Grace Lindsey
Notary Public for the Province of
British Columbia

2024-12-03, 12:44 PM

December 3, 2024

[Business Accounts](#) > [Pay Bills and Transfer Funds](#) > [Payment History](#) > Wire Payment Details

Wire Payment Details

[Printable Version](#)

Concerned about your wire payment?

If you need to follow up on your wire payment, you can open an inquiry in the *Request a Follow-Up Action* section at the bottom of the page.

Wire Payment Details

Reference Number: 60B743041629130H

Date Submitted: October 30, 2024

From: Chequing 06550-1016237

Recipient: ☒ Gilbert+Tobin LLP

Estimated Delivery Date: November 04, 2024

Amount in Funding
Currency: \$9,369.00 CAD

Amount in Recipient's
Currency: 10000.00 AUD

Exchange Rate: 1 CAD = 1.067350 AUD

Wire Fee: \$20.00 CAD

Debit Amount: \$9,389.00 CAD

Reason for Wire: Goods and Services

Additional Information:

Check [wire status](#) in your Message Centre

Request a Follow-Up Action

Request Action:

Select Type



There are two separate actions you can request:

1. A **Payment Not Received Investigation** if after 5 days your recipient claims wire payment has not been received.
2. A **Cancellation** request can be sent to the recipient bank, conducted on a best-effort basis.

Royal Bank of Canada Website, © 1995-2024

[Privacy & Security](#) | [Legal](#) | [Accessibility](#)



RBC Royal Bank®



LAMBDA SOLUTIONS INC

Sign Out

December 3, 2024

[Business Accounts](#) > [Pay Bills and Transfer Funds](#) > [Payment History](#) > Wire Payment Details

Wire Payment Details

[Printable Version](#)

Concerned about your wire payment?

If you need to follow up on your wire payment, you can open an inquiry in the *Request a Follow-Up Action* section at the bottom of the page.

Wire Payment Details

Reference Number: 60B553050903060H

Date Submitted: October 31, 2024

From: Chequing 06550-1016237

Recipient: ☐ Gilbert+Tobin LLP

Estimated Delivery Date: November 04, 2024

Amount in Funding Currency: \$1,870.20 CAD

Amount in Recipient's Currency: 2000.00 AUD

Exchange Rate: 1 CAD = 1.069404 AUD

Wire Fee: \$15.00 CAD

Debit Amount: \$1,885.20 CAD

Reason for Wire: Legal and Professional Fees

Additional Information:

Check [wire status](#) in your Message Centre

Request a Follow-Up Action

Request Action:

Select Type



There are two separate actions you can request:

1. A **Payment Not Received Investigation** if after 5 days your recipient claims wire payment has not been received.
2. A **Cancellation** request can be sent to the recipient bank, conducted on a best-effort basis.

Royal Bank of Canada Website, © 1995-2024

[Privacy & Security](#) | [Legal](#) | [Accessibility](#)
