



This is the 3rd affidavit
of Todd Peterson in this case
and was made on December 20, 2024

NO. NEW-S-S-254494
NEW WESTMINSTER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

AIR PASSENGER RIGHTS

PLAINTIFF

AND

WESTJET AIRLINES LTD.

DEFENDANT

AFFIDAVIT

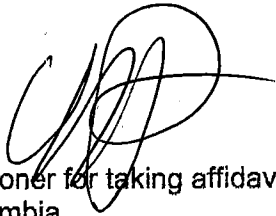
I, Todd Peterson, of 22 Aerial Place North East, in the City of Calgary, in the Province of Alberta, AFFIRM THAT:

1. I am the Director, Regulatory Affairs & Accessibility, of WestJet, an Alberta partnership ("WestJet"). As such, I have personal knowledge of the facts and matters hereinafter referred to, save and except where stated to be on information and belief, and where so stated I verily believe them to be true.
2. I have reviewed unredacted copies of the documents listed in WestJet's List of Documents as Documents 1.33-1.36.
3. Documents 1.33 – 1.36 are internal policy documents accessible only by WestJet personnel and for whom their contract of employment includes provisions that prevent the release of such internal documents outside WestJet. These documents including internal procedures for verification of information, fraud protection mechanisms, internal processes showing how refunds and re-accommodations are processed, instructions for how bookings made through travel agents are modified and processed, instructions for how itineraries related to vacation package bookings

are processed, instructions for how interline recovery and re-accommodations are processed, and instructions for how downgrades are processed.


4. These documents contain technical, procedural, and commercially sensitive information that is proprietary in nature.
5. I believe that it would be harmful to WestJet if the information contained in these documents became available for review by competitor airlines or other third parties. For example, competitor airlines could use the information in the documents to create their own claims handling processes and own internal mechanisms in competition with WestJet.
6. I acknowledge the solemnity of making an affirmed statement and acknowledge the consequences of making an untrue statement.
7. I was not physically present before the person before whom this affidavit was affirmed but was in that person's presence using videoconference.

AFFIRMED BEFORE ME at Vancouver,)
British Columbia on December 20, 2024.)



A commissioner for taking affidavits for
British Columbia.

NICOLAS V. PIMENTEL
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Todd Peterson