



This is the 1st affidavit of Alice Tsui
in this case and was made on
January 26, 2024

No. S-238586
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

1038573 B.C. LTD.

Plaintiff

AND:

THE OWNERS, STRATA PLAN NW289, JENNY DONNA DICKISON, FERNANDO MARCELINO DUTRA DE SOUSA, 1276331 B.C. LTD., CARMELIA MARIA DA SILVA, HON-CHING RUDOLPH CHENG, 1161359 B.C. LTD., RICKY HEE MENG LAI, PIA FACCIIO, 1184416 B.C. LTD., MARK WILLIAM LOUITTIT and SARAH KINUKO LOUITTIT, BARRY DOUGLAS WATSON, AS ADMINISTRATOR OF THE ESTATE OF KENNETH JOHN WATSON, LI PING DUAN, NORMAN VICTOR LEECH, ROLANDO VINAS DIZON and NARCISA DIZON, NICHOLAS GEORGE KARAMOUZOS and MARIA KARAMOUZOS, CUI MING CHEN, YANKUI WANG and XIN TIAN, MARIA DA NATIVIDADE ALMEIDA, 1237765 B.C. LTD., JU-SHAN CHIANG and FLORA FU, 1184414 B.C. LTD., AMARSINGH BHATIA and NARANJAN KAUR BHATIA, PHUNG KIM VUONG and TUONG LAM, MONICA PAOLA ALIAGA, MARCELINO LOPES DE SOUSA and OLGA MARIA DUTRA DE SOUSA, 1184413 B.C. LTD., LUALHATI ONGKEKO CRISOSTOMO, RICHARD RAYMOND RAVENSBERGEN and DAWN MARIE RAVENSBERGEN, YUK FAR CHEUNG and YIN ON CHEUNG, GARY LUCIEN DREES, THOMAS PATRICK FLEMING, 1352962 B.C. LTD., WAN CHEN and HONG YANG, SU JUAN SITU, VAN DAO NGUYEN and THI BICH HANG NGUYEN, JULIAN BOZSIK, CHRISTIAN HERBERT JOSON-LIM and IRIS JUNE CALIBUGAN ADIONG, ANGELA JOY EYKELBOSH, NGUYEN THANH VUONG and TUYET NGOC DU, OM PARKASH LOOMBA and MERRAN LOOMBA, SUZANNE JUANITA KUDELSKI, YAN QIONG LU, PING HE, EDWARD LAWRENCE THUE, RICHARD CHARLES PATRICK SPENCER and DIANE MARIE SPENCER, ARTHUR SUMMERS WILLIAMSON, GARY DALE CHARTER and CRISTINA RIMANDO GAPAL, JU TAI ZHOU and YU QING LI, ZHI HAO YANG, DAISY CUETO EVANGELISTA and MARIA CHERRY EVANGELISTA, MEGAN MARY BURGHALL, NASIM BHALOO, HUI LIN DONG and LI WANG, MANSOUR MESHKI, HSIANG CHIAO HUANG, GORDON WILLIAM PATERSON, YVONNE JO-ANNE ENGLAND, GRACE JOANNA LEVSEN, PING CHOR CHAN, SO FAN LEE and TAK TAI LUI

Defendants

1038573 B.C. LTD.

Defendant by way of Counterclaim

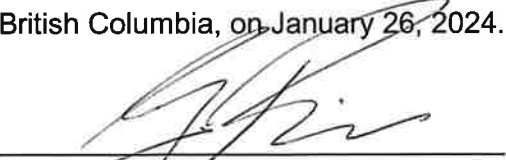
AFFIDAVIT

I, **ALICE TSUI**, Legal Assistant, of the City of Vancouver, in the Province of British Columbia, AFFIRM THAT:

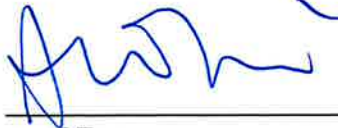
1. I am a Legal Assistant with Dennis James Aitken LLP, counsel for the plaintiff in this case, 1038573 B.C. Ltd. ("**573**"). I have personal knowledge of the matters deposed to, except where stated to be based on information and belief, and, where so stated, I verily believe the same to be true.
2. Attached to my affidavit and marked as "**Exhibit A**" is a copy of the Notice of Civil Claim filed April 17, 2020 in the Supreme Court of British Columbia Vancouver Registry, Action No. S204200.
3. Attached to my affidavit and marked as "**Exhibit B**" is a copy of a 2023 Annual Tax Sale notice, published by the City of Burnaby on September 14, 2023.
4. Attached to my affidavit and marked as "**Exhibit C**" is a copy of a letter from Peter Roberts, K.C. of Lawson Lundell LLP, counsel for The Owners, Strata Plan NW289 to Craig Dennis, K.C. of Dennis James Aitken LLP, counsel for 573, dated December 19, 2023.
5. Attached to my affidavit and marked as "**Exhibit D**" is a copy of a letter from Mr. Dennis to Mr. Roberts dated January 3, 2024.
6. Attached to my affidavit and marked as "**Exhibit E**" is a copy of a letter from Mr. Dennis to Mr. Roberts and Sarah Hannigan of Lawson Lundell LLP, dated January 22, 2024.
7. Attached to my affidavit and marked as "**Exhibit F**" is a copy of a draft bill of costs of The Owners, Strata Plan NW289, prepared by Dennis James Aitken LLP.

8. Attached to my affidavit and marked as “Exhibit G” is a copy of a letter from Mr. Dennis to Mr. Roberts and Ms. Hannigan, dated January 26, 2024.

AFFIRMED BEFORE ME at Vancouver,
British Columbia, on January 26, 2024.


A Commissioner for taking Affidavits for
British Columbia

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ALICE TSUI

GABRIEL RINCON
Barrister & Solicitor
DENNIS JAMES AITKEN LLP
800 – 543 Granville Street
Vancouver, BC V6C 1X8
(604) 235-0118

This is **Exhibit "A"** referred to in the affidavit
of Alice Tsui made before me on this
26th day of January, 2024.

No. S E 238586
Vancouver Registry



[Signature]
A Commissioner for taking Affidavits in
British Columbia

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

1038573 B.C. LTD.

Plaintiff

AND:

THE OWNERS, STRATA PLAN NW289, JENNY DONNA DICKISON, FERNANDO MARCELINO DUTRA DE SOUSA, 1276331 B.C. LTD., CARMELIA MARIA DA SILVA, HON-CHING RUDOLPH CHENG, 1161359 B.C. LTD., RICKY HEE MENG LAI, PIA FACCIIO, 1184416 B.C. LTD., MARK WILLIAM LOUTTIT and SARAH KINUKO LOUTTIT, BARRY DOUGLAS WATSON, AS ADMINISTRATOR OF THE ESTATE OF KENNETH JOHN WATSON, LI PING DUAN, NORMAN VICTOR LEECH, ROLANDO VINAS DIZON and NARCISA DIZON, NICHOLAS GEORGE KARAMOUZOS and MARIA KARAMOUZOS, CUI MING CHEN, YANKUI WANG and XIN TIAN, MARIA DA NATIVIDADE ALMEIDA, 1237765 B.C. LTD., JU-SHAN CHIANG and FLORA FU, 1184414 B.C. LTD., AMARSINGH BHATIA and NARANJAN KAUR BHATIA, PHUNG KIM VUONG and TUONG LAM, MONICA PAOLA ALIAGA, MARCELINO LOPES DE SOUSA and OLGA MARIA DUTRA DE SOUSA, 1184413 B.C. LTD., LUALHATI ONGKEKO CRISOSTOMO, RICHARD RAYMOND RAVENSBERGEN and DAWN MARIE RAVENSBERGEN, YUK FAR CHEUNG and YIN ON CHEUNG, GARY LUCIEN DREES, THOMAS PATRICK FLEMING, 1352962 B.C. LTD., WAN CHEN and HONG YANG, SU JUAN SITU, VAN DAO NGUYEN and THI BICH HANG NGUYEN, JULIAN BOZSIK, CHRISTIAN HERBERT JOSON-LIM and IRIS JUNE CALIBUGAN ADIONG, ANGELA JOY EYKELBOSH, NGUYEN THANH VUONG and TUYET NGOC DU, OM PARKASH LOOMBA and MERRAN LOOMBA, SUZANNE JUANITA KUDELSKI, YAN QIONG LU, PING HE, EDWARD LAWRENCE THUE, RICHARD CHARLES PATRICK SPENCER and DIANE MARIE SPENCER, ARTHUR SUMMERS WILLIAMSON, GARY DALE CHARTER and CRISTINA RIMANDO GAPAL, JU TAI ZHOU and YU QING LI, ZHI HAO YANG, DAISY CUETO EVANGELISTA and MARIA CHERRY EVANGELISTA, MEGAN MARY BURGHALL, NASIM BHALOO, HUI LIN DONG and LI WANG, MANSOUR MESHKI, , HSIANG CHIAO HUANG, GORDON WILLIAM PATERSON, YVONNE JO-ANNE ENGLAND, GRACE JOANNA LEVSEN, PING CHOR CHAN, SO FAN LEE and TAK TAI LUI

Defendants

NOTICE OF CIVIL CLAIM

This action has been started by the plaintiff for the relief set out in Part 2 below.

If you intend to respond to this action, you or your lawyer must:

- (a) file a response to civil claim in Form 2 in the above-named registry of this court within the time for response to civil claim described below, and

- (b) serve a copy of the filed response to civil claim on the plaintiff.

If you intend to make a counterclaim, you or your lawyer must:

- (a) file a response to civil claim in Form 2 and a counterclaim in Form 3 in the above-named registry of this court within the time for response to civil claim described below, and
- (b) serve a copy of the filed response to civil claim and counterclaim on the plaintiff and on any new parties named in the counterclaim.

JUDGMENT MAY BE PRONOUNCED AGAINST YOU IF YOU FAIL to file the response to civil claim within the time for response to civil claim described below.

Time for response to civil claim

A response to civil claim must be filed and served on the plaintiff:

- (a) if you were served with the notice of civil claim anywhere in Canada, within 21 days after that service,
- (b) if you were served with the notice of civil claim anywhere in the United States of America, within 35 days after that service,
- (c) if you were served with the notice of civil claim anywhere else, within 49 days after that service, or
- (d) if the time for response to civil claim has been set by order of the court, within that time.

CLAIM OF THE PLAINTIFF

Part 1: STATEMENT OF FACTS

1. The plaintiff, 1038573 B.C. Ltd. ("**573**"), is a company duly incorporated pursuant to the laws of British Columbia, with a registered address at 215-13737 – 72nd Avenue, Surrey, British Columbia.

2. The defendant, The Owners, Strata Plan NW289 (the "**Strata Corporation**"), is a strata corporation duly subsisting pursuant to the *Strata Property Act*, S.B.C. 1998, c. 43, with a registered address c/o Bayside Property Services Ltd., Suite #100, 6400 Roberts Street, Burnaby, British Columbia.

3. The defendants listed in Schedule "A" to this notice of civil claim are the registered owners of strata lots 1 through 101 of the Strata Corporation (together, the "**Strata Lot Owners**"). The Strata Lot Owners' respective addresses for service are listed in Schedule "A".

4. The Strata Lot Owners own the common property and common assets of the Strata Corporation as tenants in common pursuant to s. 66 of the *Strata Property Act*, S.B.C. 1998, c. 43.

5. By an agreement in writing made on or about December 7, 2022 between 573 as purchaser and the Strata Corporation (on its own behalf and on behalf of the Strata Lot Owners) as vendor (the "**Purchase Contract**"), 573 agreed to purchase and the Strata Corporation agreed to sell all of the lands and premises within Strata Plan NW289, municipally located at 3925 Kingsway, Burnaby, British Columbia, V5H 3Y7 and 5715 Jersey Avenue, Burnaby, British Columbia, V5H 2L3 and more particularly described in Schedule "B" hereto, together with all improvements thereon and rights and benefits appurtenant thereto (together, the "**Property**"), for a price of \$61,000,000.

6. On May 20, 2023, the Strata Corporation held a special general meeting at which a resolution was proposed to approve the Purchase Contract (the "**Resolution**"). The Resolution achieved over 75 percent support from the Strata Lot Owners and was therefore approved.

7. The completion date in the Purchase Contract, as amended, was December 15, 2023.

8. 573 wanted to purchase the Property, and entered into the Purchase Contract, because the Property is unique and has special characteristics, including in the following respects:

- (a) the Property's location – including proximity to Vancouver, nearby amenities, a major thoroughfare (Kingsway) and transit (bus access on Kingsway; close to Patterson Station);
- (b) considerable nearby parklands – including the 86-hectare Central Park located directly to the south;
- (c) the size, nature and age of the Property and the buildings thereon, and the lack of any similar properties on the market; and

- (d) the Property's existing zoning – which allows for considerable future development opportunity – and the potential future sightlines of those developments, given Central Park's location directly to the south of the Property.

9. The Strata Corporation (acting on its own behalf and on behalf of the Strata Lot Owners) has failed to complete the sale and purchase of the Property in accordance with the Purchase Contract, including because the Strata Corporation has failed to deliver clear title to the Property (and, further, indicated to 573 in the period prior to closing that the Strata Corporation would not on closing be in a position to deliver clear title).

10. 573 has at all material times been ready, willing, and able to complete the sale and purchase of the Property in accordance with the Purchase Contract. However, the Strata Corporation's breaches of the Purchase Contract have prevented 573 from closing under the Purchase Contract.

11. Since the Property has unique and special characteristics, an alternative property that lacked such features would not be a suitable substitute, having regard to the purpose for which 573 agreed to purchase the Property.

12. On December 18, 2023, 573 wrote to the Strata Corporation setting out that (i) the Strata Corporation had repudiated the Purchase Contract, (ii) 573 does not accept that repudiation and insists on specific performance, and (iii) as neither party was in a position on December 15, 2023 to close as a result of the Strata Corporation's breaches of the Purchase Contract, 573 designates March 15, 2024 as the new completion date under the Purchase Contract and time continues to be of the essence.

Part 2: RELIEF SOUGHT

13. 573 claims against the defendants as follows:

- (a) an order that the Strata Corporation specifically perform its agreement to sell the Property to 573, in accordance with the terms of the Purchase Contract, on March 15, 2024 or such other date as is designated by this Honourable Court;
- (b) an order that the defendants take and do all steps necessary to complete the sale of the Property to 573;

- (c) a certificate of pending litigation against title to the Property;
- (d) in the alternative, damages in lieu of specific performance;
- (e) in the further alternative, damages for breach of contract;
- (f) if necessary, interest pursuant to the *Court Order Interest Act*, R.S.B.C. 1996, c. 79;
- (g) costs; and
- (h) such further and other relief as this Honourable Court may order.

Part 3: LEGAL BASIS

14. 573 and the Strata Corporation have an agreement, in the terms of the Purchase Contract, which provides 573 with a valid and subsisting right to purchase the Property for \$61,000,000.

15. In breach of the Purchase Contract, the Strata Corporation (acting on behalf of the Strata Lot Owners) is refusing to perform the Purchase Contract.

16. The Property has unique and special characteristics such that an alternative property that lacked those features would not be a suitable substitute. As a result, 573 is entitled to specific performance of the Purchase Contract for the sale of the Property or, alternatively, damages in lieu of specific performance.

17. 573 is entitled to file a Certificate of Pending Litigation against title to the Property (in particular, each of strata lots 1 through 101 of the Strata Corporation) on the basis that 573 has an interest in the Property pursuant to the Purchase Contract.

18. 573 pleads and relies on s. 215 of the *Land Title Act*, R.S.B.C. 1996, c. 250.

Plaintiff's address for service:

Dennis James Aitken LLP
800 – 543 Granville Street
Vancouver, BC V6C 1X8

**Attention: Craig Dennis, K.C.
Ray Power
San Chan**

Fax number address for service (if any): N/A

Email address for service (if any):

cdennis@djacounsel.com
rpower@djacounsel.com
schan@djacounsel.com

Place of trial:

Vancouver, British Columbia

The address of the registry is:

Vancouver Law Courts
800 Smithe Street
Vancouver, British Columbia

Date: December 18, 2023



Signature of counsel for the plaintiff
Craig Dennis, K.C.
Dennis James Aitken LLP

Rule 7-1(1) of the Supreme Court Civil Rules states:

(1) Unless all parties of record consent or the court otherwise orders, each party of record to an action must, within 35 days after the end of the pleading period,

- (a) prepare a list of documents in Form 22 that lists
 - (i) all documents that are or have been in the party's possession or control and that could, if available, be used by any party at trial to prove or disprove a material fact, and
 - (ii) all other documents to which the party intends to refer at trial, and
- (b) serve the list on all parties of record.

APPENDIX

Part 1: CONSISE SUMMARY OF NATURE OF CLAIM:

The plaintiff's claim is against the defendants for specific performance of a contract for the sale of land.

Part 2: THIS CLAIM ARISES FROM THE FOLLOWING:

A personal injury arising out of:

- a motor vehicle accident
- medical malpractice
- another cause

A dispute concerning:

- contaminated sites
- construction defects
- real property (real estate)
- personal property
- the provision of goods or services or other general commercial matters
- investment losses
- the lending of money
- an employment relationship
- a will or other issues concerning the probate of an estate
- a matter not listed here

Part 3: THIS CLAIM INVOLVES:

- a class action
- maritime law
- Aboriginal law
- constitutional law
- conflict of law
- none of the above
- do not know

Part 4: ENACTMENTS:

Court Order Interest Act, R.S.B.C. 1996, c. 79.

Land Title Act, R.S.B.C. 1996 c. 250.

Strata Property Act, S.B.C. 1998, c. 43.

Schedule "A"

STRATA LOTS – OWNERS

LOT NO.	REGISTERED OWNER(S)
1.	JENNY DONNA DICKISON 105 – 3925 Kingsway Burnaby, BC V5H 3Y7
2.	FERNANDO MARCELINO DUTRA DE SOUSA 106 – 3925 Kingsway Burnaby, BC V5H 3Y7
3.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
4.	CARMELIA MARIA DA SILVA 108 – 3925 Kingsway Burnaby, BC V5H 3Y7
5.	HON-CHING RUDOLPH CHENG 109 – 3925 Kingsway Burnaby, BC V5H 3Y7
6.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
7.	1161359 B.C.LTD. 1130 – 1185 West Georgia St. Vancouver, BC V6E 4E6
8.	RICKY HEE MENG LAI 112 – 3925 Kingsway Burnaby, BC V5H 3Y7
9.	PIA FACCIIO 685 Pleasant Park Ottawa, Ontario K1O 1Y3
10.	1161359 B.C.LTD. 1130 – 1185 West Georgia St. Vancouver, BC V6E 4E6
11.	1161359 B.C.LTD. 1130 – 1185 West Georgia St. Vancouver, BC V6E 4E6
12.	1184416 BC LTD. 1130 – 1185 West Georgia St. Vancouver, BC V6E 4E6
13.	MARK WILLIAM LOUITIT and SARAH KINUKO LOUITIT 118 – 3925 Kingsway Burnaby, BC V5H 3Y7 (as joint tenants)

LOT NO.	REGISTERED OWNER(S)
14.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
15.	BARRY DOUGLAS WATSON, AS ADMINISTRATOR OF THE ESTATE OF KENNETH JOHN WATSON 130 Dewdney Crescent Penticton, BC V2A 7Z6
16.	LI PING DUAN 102 – 3925 Kingsway Burnaby, BC V5H 3Y7
17.	NORMAN VICTOR LEECH 103 – 3925 Kingsway Burnaby, BC V5H 3Y7
18.	ROLANDO VINAS DIZON and NARCISA DIZON 104 – 3925 Kingsway Burnaby, BC V5H 3Y7 (as joint tenants)
19.	NICHOLAS GEORGE KARAMOUZOS and MARIA KARAMOUZOS 205 – 3925 Kingsway Burnaby, BC V5H 3Y7 (as joint tenants)
20.	CUI MING CHEN 206 – 3925 Kingsway Burnaby, BC V5H 3Y7
21.	YANKUI WANG 302 – 5565 Inman Avenue Burnaby, BC V5H 2M2 (as to an undivided 1/100 interest) XIN TIAN 207 – 3925 Kingsway Burnaby, BC V5H 3Y7 (as to an undivided 99/100 interest)
22.	MARIA DA NATIVIDADE ALMEIDA 208 – 3925 Kingsway Burnaby, BC V5H 3Y7
23.	1237765 B.C. LTD. 268 – 8191 Westminster Highway Richmond, BC V6X 1A7
24.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
25.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4

LOT NO.	REGISTERED OWNER(S)
26.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
27.	JU-SHAN CHIANG and FLORA FU 214 – 3925 Kingsway Burnaby, BC V5H 3Y7 (as joint tenants)
28.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
29.	1184414 BC LTD. 1130 – 1185 Georgia St. W. Vancouver, BC V6E 4E6
30.	1161359 B.C.LTD. 1234 West 41 st Avenue Vancouver, BC V6M 1X2
31.	AMARSINGH BHATIA and NARANJAN KAUR BHATIA 218 – 3925 Kingsway Burnaby, BC V5H 3Y7 (as joint tenants)
32.	PHUNG KIM VUONG and TUONG LAM 219 – 3925 Kingsway Burnaby, BC V5H 3Y7 (as joint tenants)
33.	MONICA PAOLA ALIAGA 201 – 3925 Kingsway Burnaby, BC V5H 3Y7
34.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
35.	MARCELINO LOPES DE SOUSA and OLGA MARIA DUTRA DE SOUSA 5507 Woodsworth St. Burnaby, BC V5G 4M3 (as joint tenants)
36.	1237765 B.C. LTD. 268 – 8191 Westminster Highway Richmond, BC V6X 1A7
37.	1184413 BC LTD. 1130 – 1185 West Georgia St. Vancouver, BC V6J 4H1
38.	LUALHATI ONGKEKO CRISOSTOMO 306 – 3925 Kingsway Burnaby, BC V5H 3Y7

LOT NO.	REGISTERED OWNER(S)
39.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
40.	RICHARD RAYMOND RAVENSBERGEN and DAWN MARIE RAVENSBERGEN 308 – 3925 Kingsway Burnaby, BC V5H 3Y7 (as joint tenants)
41.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
42.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
43.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
44.	1184414 BC LTD. 1130 – 1185 Georgia St. W. Vancouver, BC V6E 4E6
45.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
46.	YUK FAR CHEUNG and YIN ON CHEUNG 315 – 3925 Kingsway Burnaby, BC V5H 3Y7 (as joint tenants)
47.	1184413 BC LTD. 1130 – 1185 West Georgia St. Vancouver, BC V6E 4E6
48.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
49.	GARY LUCIEN DREES 318 – 3925 Kingsway Burnaby, BC V5H 3Y7
50.	THOMAS PATRICK FLEMING 319 – 3925 Kingsway Burnaby, BC V5H 3Y7
51.	1161359 B.C.LTD. 1130 – 1185 West Georgia St. Vancouver, BC V6E 4E6
52.	1184416 B.C.LTD. 1130 – 1185 West Georgia St. Vancouver, BC V6E 4E6

LOT NO.	REGISTERED OWNER(S)
53.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
54.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
55.	1352962 B.C. LTD. 2300 – 550 Burrard Street Vancouver, BC V6C 2B5
56.	WAN CHEN and HONG YANG 114 – 5715 Jersey Avenue Burnaby, BC V5H 2L3 (as joint tenants)
57.	1161359 B.C.LTD. 1130 – 1185 West Georgia St. Vancouver, BC V6E 4E6
58.	1184416 B.C.LTD. 1130 – 1185 West Georgia St. Vancouver, BC V6E 4E6
59.	SU JUAN SITU 101 – 5715 Jersey Avenue Burnaby, BC V5H 2L3
60.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
61.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
62.	VAN DAO NGUYEN and THI BICH HANG NGUYEN 104 – 5715 Jersey Avenue Burnaby, BC V5H 2L3 (as joint tenants)
63.	JULIAN BOZSIK 105 – 5715 Jersey Avenue Burnaby, BC V5H 2L3
64.	CHRISTIAN HERBERT JOSON-LIM and IRIS JUNE CALIBUGAN ADIONG 106 – 5715 Jersey Avenue Burnaby, BC V5H 2L3 (as joint tenants)
65.	ANGELA JOY EYKELBOSH 4372 Webdon Road Duncan, BC V9L 6J5

LOT NO.	REGISTERED OWNER(S)
66.	THE OWNERS, STRATA PLAN NW289 3925 Kingsway Burnaby, BC V5H 3Y7
67.	1184416 B.C.LTD. 1130 – 1185 West Georgia St. Vancouver, BC V6E 4E6
68.	NGUYEN THANH VUONG and TUYET NGOC DU 102 – 2277 East 30th Avenue Vancouver, BC V5N 5N1 (as joint tenants)
69.	1352962 B.C. LTD. 2300 – 550 Burrard Street Vancouver, BC V6C 2B5
70.	1161359 B.C.LTD. 1130 – 1185 West Georgia St. Vancouver, BC V6E 4E6
71.	OM PARKASH LOOMBA and MERRAN LOOMBA 215 – 5715 Jersey Avenue Burnaby, BC V5H 2L3 (as joint tenants)
72.	SUZANNE JUANITA KUDELSKI 216 – 5715 Jersey Avenue Burnaby, BC V5H 2L3
73.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
74.	YAN QIONG LU 201 – 5715 Jersey Avenue Burnaby, BC V5H 2L3
75.	1184416 B.C.LTD. 1130 – 1185 West Georgia St. Vancouver, BC V6E 4E6
76.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
77.	PING HE 204 – 5715 Jersey Avenue Burnaby, BC V5H 2L3
78.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
79.	EDWARD LAWRENCE THUE 206 – 5715 Jersey Avenue Burnaby, BC V5H 2L3

LOT NO.	REGISTERED OWNER(S)
80.	RICHARD CHARLES PATRICK SPENCER and DIANE MARIE SPENCER 207 – 5715 Jersey Avenue Burnaby, BC V5H 2L3 (as joint tenants)
81.	ARTHUR SUMMERS WILLIAMSON 208 – 5715 Jersey Avenue Burnaby, BC V5H 2L3
82.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
83.	GARY DALE CHARTER and CRISTINA RIMANDO GAPAL 210 – 5715 Jersey Avenue Burnaby, BC V5H 2L3 (as joint tenants)
84.	JU TAI ZHOU and YU QING LI 211 – 5715 Jersey Avenue Burnaby, BC V5H 2L3 (as joint tenants)
85.	ZHI HAO YANG 212 – 5715 Jersey Avenue Burnaby, BC V5H 2L3
86.	DAISY CUETO EVANGELISTA and MARIA CHERRY EVANGELISTA 314 – 5715 Jersey Avenue Burnaby, BC V5H 2L3 (as joint tenants)
87.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
88.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
89.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
90.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
91.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
92.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4

LOT NO.	REGISTERED OWNER(S)
93.	MEGAN MARY BURGHALL 304 – 5715 Jersey Avenue Burnaby, BC V5H 2L3
94.	NASIM BHALOO 305 – 5715 Jersey Avenue Burnaby, BC V5H 2L3
95.	HUI LIN DONG and LI WANG 306 – 5715 Jersey Avenue Burnaby, BC V5H 2L3 (as joint tenants)
96.	MANSOUR MESHKI 307 – 5715 Jersey Avenue Burnaby, BC V5H 2L3
97.	1276331 B.C. LTD. 2233 West 35 th Avenue Vancouver, BC V6M 1J4
98.	HSIANG CHIAO HUANG 309 – 5715 Jersey Avenue Burnaby, BC V5H 2L3
99.	GORDON WILLIAM PATERSON 8992 Major Street Fort Langley, BC V1M 2R8 YVONNE JO-ANNE ENGLAND 45 – 21164 88 Avenue Langley, BC V1M 2E9 GRACE JOANNA LEVSEN 310 5715 Jersey Avenue Burnaby, BC V5H 2L3 (as joint tenants)
100.	PING CHOR CHAN 311 – 5715 Jersey Avenue Burnaby, BC V5H 2L3
101.	SO FAN LEE 312 – 5715 Jersey Avenue Burnaby, BC V5H 2L3 (as to an undivided 3/4 interest) TAK TAI LUI 312 – 5715 Jersey Avenue Burnaby, BC V5H 2L3 (as to an undivided 1/4 interest)

Schedule "B"

STRATA LOTS – LEGAL DESCRIPTIONS

LOT NO.	LEGAL DESCRIPTION
1.	STRATA LOT 1 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-262-921
2.	STRATA LOT 2 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-262-939
3.	STRATA LOT 3 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-262-947
4.	STRATA LOT 4 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-262-963
5.	STRATA LOT 5 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-262-971
6.	STRATA LOT 6 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-262-980
7.	STRATA LOT 7 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-262-998
8.	STRATA LOT 8 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-005
9.	STRATA LOT 9 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 000-938-530
10.	STRATA LOT 10 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-013
11.	STRATA LOT 11 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-021

LOT NO.	LEGAL DESCRIPTION
12.	STRATA LOT 12 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-030
13.	STRATA LOT 13 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-048
14.	STRATA LOT 14 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-056
15.	STRATA LOT 15 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-064
16.	STRATA LOT 16 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-081
17.	STRATA LOT 17 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 000-859-389
18.	STRATA LOT 18 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 000-739-979
19.	STRATA LOT 19 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-099
20.	STRATA LOT 20 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-102
21.	STRATA LOT 21 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-111
22.	STRATA LOT 22 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-137

LOT NO.	LEGAL DESCRIPTION
23.	STRATA LOT 23 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-145
24.	STRATA LOT 24 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-153
25.	STRATA LOT 25 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-161
26.	STRATA LOT 26 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-170
27.	STRATA LOT 27 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-188
28.	STRATA LOT 28 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-196
29.	STRATA LOT 29 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-200
30.	STRATA LOT 30 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-218
31.	STRATA LOT 31 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-226
32.	STRATA LOT 32 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-234
33.	STRATA LOT 33 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-242

LOT NO.	LEGAL DESCRIPTION
34.	STRATA LOT 34 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-251
35.	STRATA LOT 35 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-269
36.	STRATA LOT 36 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-277
37.	STRATA LOT 37 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-285
38.	STRATA LOT 38 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-293
39.	STRATA LOT 39 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 000-613-754
40.	STRATA LOT 40 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-025-953
41.	STRATA LOT 41 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-307
42.	STRATA LOT 42 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-315
43.	STRATA LOT 43 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-323
44.	STRATA LOT 44 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-340

LOT NO.	LEGAL DESCRIPTION
45.	STRATA LOT 45 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-358
46.	STRATA LOT 46 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-366
47.	STRATA LOT 47 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-374
48.	STRATA LOT 48 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-382
49.	STRATA LOT 49 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-391
50.	STRATA LOT 50 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 000-564-885
51.	STRATA LOT 51 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-404
52.	STRATA LOT 52 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-421
53.	STRATA LOT 53 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-439
54.	STRATA LOT 54 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-447
55.	STRATA LOT 55 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-455

LOT NO.	LEGAL DESCRIPTION
56.	STRATA LOT 56 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 000-814-377
57.	STRATA LOT 57 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-463
58.	STRATA LOT 58 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-480
59.	STRATA LOT 59 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-498
60.	STRATA LOT 60 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-528
61.	STRATA LOT 61 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-544
62.	STRATA LOT 62 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-561
63.	STRATA LOT 63 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-035-118
64.	STRATA LOT 64 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-561
65.	STRATA LOT 65 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-595
66.	STRATA LOT 66 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-609

LOT NO.	LEGAL DESCRIPTION
67.	STRATA LOT 67 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-617
68.	STRATA LOT 68 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-625
69.	STRATA LOT 69 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-633
70.	STRATA LOT 70 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-641
71.	STRATA LOT 71 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-650
72.	STRATA LOT 72 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-676
73.	STRATA LOT 73 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-684
74.	STRATA LOT 74 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-706
75.	STRATA LOT 75 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-714
76.	STRATA LOT 76 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-731
77.	STRATA LOT 77 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-749

LOT NO.	LEGAL DESCRIPTION
78.	STRATA LOT 78 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-757
79.	STRATA LOT 79 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 000-473-774
80.	STRATA LOT 80 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-765
81.	STRATA LOT 81 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-773
82.	STRATA LOT 82 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-781
83.	STRATA LOT 83 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-790
84.	STRATA LOT 84 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-811
85.	STRATA LOT 85 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-820
86.	STRATA LOT 86 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-838
87.	STRATA LOT 87 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-846
88.	STRATA LOT 88 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-854

LOT NO.	LEGAL DESCRIPTION
89.	STRATA LOT 89 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-862
90.	STRATA LOT 90 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-871
91.	STRATA LOT 91 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-889
92.	STRATA LOT 92 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-897
93.	STRATA LOT 93 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-919
94.	STRATA LOT 94 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-927
95.	STRATA LOT 95 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-935
96.	STRATA LOT 96 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-943
97.	STRATA LOT 97 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-951
98.	STRATA LOT 98 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-960
99.	STRATA LOT 99 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-978

LOT NO.	LEGAL DESCRIPTION
100.	STRATA LOT 100 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-263-994
101.	STRATA LOT 101 District Lot 34 Group 1 New Westminster District Strata Plan NW289 Together with an Interest in the Common Property in Proportion to the Unit Entitlement of the Strata Lot as Shown on Form 1; PID: 001-264-001

2023 Annual Tax Sale

Published: September 14, 2023

The Local Government Act Sec. 645(1) states "At 10:00am on the last Monday in September, at the council chambers, the collector must conduct the annual tax sale by offering for sale by public auction each parcel of real property on which taxes are delinquent."

Prospective bidders are advised that it is their responsibility to search the title in advance to determine if there are any charges against the property. All properties are sold as is. The City of Burnaby makes no representation expressed or implied as to the condition or quality of the properties being sold.

All bidders must pre-register to be eligible to bid at the auction. Registration will start at 9:00 A.M. and bidders must have Photo ID, Social Insurance Number and must have in their possession certified funds at the time of registration.

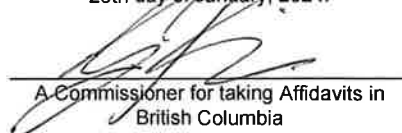
The minimum bid is the upset price, that is, the current taxes and penalties, arrears and delinquent taxes and interest, 5% tax sale costs and Land Title Office transfer fees. Upon completion of each sale, the successful bidder must make payment for the full bid amount (not only the upset price) immediately before the auction continues to the next property. Acceptable forms of payment are: certified cheque and bank draft. **Cash, personal cheque, debit and credit cards are not accepted.** If the successful bidder does not have the full payment required, the property will be put back into the auction.

Properties sold at tax sale have a redemption period of one year from the date of the tax sale by the property owner. Properties not redeemed are subject to Property Transfer Tax, by the purchaser, under the Property Purchase Tax Act. This tax will be calculated on the market value of the property at the time the title is transferred to the purchaser at the Land Title Office.

Take Notice that the following properties shall, on the 25th day of September 2023, in the Council Chambers of the City Hall, 4949 Canada Way, Burnaby BC at the hours of 10:00am be offered for sale at the public auction, unless delinquent taxes with interest are previously paid.

Property Address	PID	BCA Short Legal
216 9150 UNIVERSITY HIGH ST	028-968-191	LT 39/ PL EPS1138/ DL 211/ GRP 1/ 36
202 4888 BRENTWOOD DR	027-708-136	LT 173/ PL BCS2711/ DL 124/ GRP 1/ 36
8354 ASPENWOOD PL	001-469-690	LT 34/ PL NWS963/ DL 143/ GRP 1/ 36
TH6 4182 DAWSON ST	026-975-581	LT 10/ PL BCS2205/ DL 119/ GRP 1/ 36
905 9623 MANCHESTER DR	018-485-758	LT 56/ PL LMS1101/ DL 2 & 4/ GRP 1/ 36
111 3925 KINGSWAY	001-262-998	LT 7/ PL NWS289/ DL 34/ GRP 1/ 36
115 3925 KINGSWAY	001-263-013	LT 10/ PL NWS289/ DL 34/ GRP 1/ 36
116 3925 KINGSWAY	001-263-021	LT 11/ PL NWS289/ DL 34/ GRP 1/ 36
117 3925 KINGSWAY	001-263-030	LT 12/ PL NWS289/ DL 34/ GRP 1/ 36
216 3925 KINGSWAY	001-263-200	LT 29/ PL NWS289/ DL 34/ GRP 1/ 36
217 3925 KINGSWAY	001-263-218	LT 30/ PL NWS289/ DL 34/ GRP 1/ 36
301 3925 KINGSWAY	001-263-404	LT 51/ PL NWS289/ DL 34/ GRP 1/ 36
302 3925 KINGSWAY	001-263-421	LT 52/ PL NWS289/ DL 34/ GRP 1/ 36
305 3925 KINGSWAY	001-263-285	LT 37/ PL NWS289/ DL 34/ GRP 1/ 36
312 3925 KINGSWAY	001-263-340	LT 44/ PL NWS289/ DL 34/ GRP 1/ 36
316 3925 KINGSWAY	001-263-374	LT 47/ PL NWS289/ DL 34/ GRP 1/ 36
2808 4670 ASSEMBLY WAY	030-574-293	LT 200/ PL EPS4857/ DL 153/ GRP 1/ 36
2903 4900 LENNOX LANE	030-283-639	LT 196/ PL EPS4056/ DL 152/ GRP 1/ 36

This is Exhibit "B" referred to in the affidavit
of Alice Tsui made before me on this
26th day of January, 2024.



A Commissioner for taking Affidavits in
British Columbia

304 5889 IRMIN ST	027-999-645	LT 57/ PL BCS3540/ DL 97/ GRP 1/ 36
203 7738 EDMONDS ST	028-750-888	LT 21/ PL BCS4316/ DL 28/ GRP 1/ 36
25 8701 16TH AVE	024-256-510	LT 13/ PL LMS3670/ DL 13/ GRP 1/ 36
115 5715 JERSEY AVE	001-263-463	LT 57/ PL NWS289/ DL 34/ GRP 1/ 36
116 5715 JERSEY AVE	001-263-480	LT 58/ PL NWS289/ DL 34/ GRP 1/ 36
3206 6461 TELFORD AVE	029-341-795	LT 224/ PL EPS1239/ DL 153/ GRP 1/ 36
5205 6461 TELFORD AVE	029-342-422	LT 287/ PL EPS1239/ DL 153/ GRP 1/ 36
408 6055 NELSON AVE	010-713-077	LT 154/ PL NWS2489/ DL 32/ GRP 1/ 36
8009 MACPHERSON AVE	003-015-947	LT 1/ DL 158/ / PL NWP13253
6192 ELGIN AVE	002-730-847	LT 4/ DL 94/ / PL NWP14348
7378 HAWTHORNE TERR	024-997-722	LT 85/ DL 96/ / PL LMS4262
PH16 7383 GRIFFITHS DR	024-793-809	LT 60/ DL 96/ / PL LMS4178
508 9060 UNIVERSITY CRES	029-866-537	LT 142/ DL 211/ / PL EPS2546
2503 3737 BARTLETT CRT	001-295-772	LT 114/ DL 4/ / PL NWS319



Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2
T: 604.685.3456

This is **Exhibit "C"** referred to in the affidavit
of Alice Tsui made before me on this
26th day of January, 2024.



A Commissioner for taking Affidavits in
British Columbia

December 19, 2023

VIA EMAIL

cdennis@djacounsel.com

Dennis James Aitken LLP
800 – 543 Granville Street
Vancouver, BC V6C 1X8

Attention: Craig Dennis, K.C.

Dear Sir:

**Re: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 and others, B.C.S.C. Vancouver
Reg. No. S-238586 (the "Action")**

We are in receipt of your letters of December 18, 2023 delivering copies of the Notice of Civil Claim and resulting CPL filed on title to the individually owned strata units comprising The Owners, Strata Plan NW289 ("**Cameray Gardens**"). We write to express the dismay of the Cameray Gardens owners at the cynical conduct of your client in filing the Action and seeking to artificially create an extension to the purchase and sale agreement dated December 7, 2022 (the "**PSA**") at no cost to the purchaser but which visits considerable hardship and uncertainty on these owners. Whatever goodwill existed for your client has now entirely dissipated.

As a matter of law, we write to put on the record that it is our client's position is that it is your client, 1038573 B.C. Ltd., that failed to complete the PSA and has repudiated that agreement. That repudiation is accepted, ending the PSA. As a result, your client has no claim for specific performance.

We have instructions only to accept service of the Notice of Civil Claim on behalf of The Owners, Strata Plan NW289, as represented by the liquidator, Crowe Mackay & Company Ltd. (the "**Liquidator**"). You will need to make arrangements to personally serve all the other defendants. We ask that you keep us apprised, on a rolling basis, of your success in doing so.

We also write to demand the immediate discharge of all the CPLs filed on December 18, 2023 against title to the individual strata units of Cameray Gardens, save the unit owned by the strata corporation itself and the Cameray Gardens common property. In filing these CPLs, your client has demonstrated a fundamental misunderstanding about the structure of this transaction.

Peter J. Roberts, K.C.
D: 604.631.9158
F: 604.641.4400
proberts@lawsonlundell.com

Page 2

Your client has no contractual relationship with any of the individual strata unit owners and, consequently, no contractual right to claim an estate or interest in their units. Your client's contractual rights are set out in the PSA (if still enforceable) and are with the strata corporation as represented by the Liquidator. By filing CPLs against title to the individual units, your client has and will continue to cause financial hardship to those owners with mortgages and other financial security on title. By filing the CPLs, your client has likely put each of these owners into default with their lenders and denied them access to credit. The lenders are likely to cease advancing credit to these people and take steps to call the loans or foreclose on their security.

Your client has also overlooked the fact that at all times the PSA contemplated that individual strata unit owners may still sell their particular units to third parties. Any third party purchaser of a unit buys subject to the strata wind-up order and the PSA (when it was still enforceable). Filing the CPLs precludes this.

Both of these outcomes are a breach of the PSA (if still enforceable) and visit an unacceptable hardship and inconvenience on all these owners. The CPLs must be discharged immediately, failing which we will bring an application to have the CPLs discharged under section 256 of the *Land Title Act*. In the event that application is necessary, we will seek costs against your client payable forthwith in any event of the cause.

Please provide us by the end of day tomorrow (December 20, 2023) with a registerable form of discharge for all the CPLs registered on title to the individually owned strata units of Cameray Gardens.

Our client is also concerned about the financial wherewithal of your client, a numbered company, to pay an adverse costs award in the Action. We write to notify you that, subject to any response to this letter, our client intends to bring a security for cost application. In advance of that, we asked that you provide us with sufficient evidence to establish that your client has the financial wherewithal to pay any cost award made against it in this matter. Based on our searches, it does not appear that your client has any assets in British Columbia.

Yours very truly,

LAWSON LUNDELL LLP



Peter J. Roberts, K.C.

PJR/acc2

cc. Crowe MacKay & Company Ltd.
Jennifer Williams, MLT Aikins LLP (jwilliams@mltaikins.com)

January 3, 2024

Via Email (proberts@lawsonlundell.com)

Lawson Lundell LLP
1600 Cathedral Place
925 West Georgia St.
Vancouver, BC V6C 3L2

Attention: Peter Roberts, K.C.

Dear Sirs/Mesdames:

**Re: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289,
SCBC Vancouver Registry Action No. S-238586**

We write further to your letter of December 19, 2023, and our subsequent phone conversation.

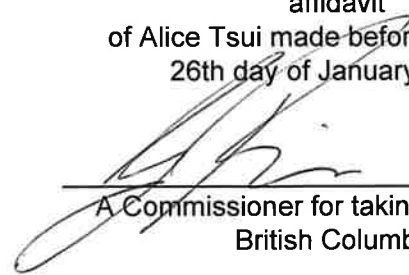
The notice of civil claim sets out the basis for the plaintiff's specific performance claim and associated CPLs. We will not repeat that in this letter and add only that we fundamentally disagree with your characterization of events.

We do wish to address your request for a discharge of the CPLs filed against title to the individual strata units, failing which you say you will bring applications for discharge under s. 256 of the *Land Title Act*.

First, we disagree with the suggestion in your letter that our client has misunderstood the structure of the transaction. Our client's right, set out in the PSA, is to acquire each of the 101 strata units (see e.g. PSA s. 2.1: "The Purchaser hereby agrees to purchase the Property ... and the Vendor agrees to sell the Property to the Purchaser...". Property is defined in PSA s. 1.1 to include the 101 strata units.). The above action thus claims an interest in each unit. The CPLs are a consequent and lawful step, following on the Vendor's failure (as duly authorized representative of the strata unit owners) to perform under the PSA.

Second, our client does not accept the suggestion, without more, of hardship to the strata unit owners. Any sale of a strata unit to a third party would appear to be contrary to the terms of the PSA, including s. 4.1(d) (that the Vendor will "from the Execution Date until the Completion Date, conduct or cause to be conducted all business in respect of the Property in accordance with prudent business practices given the nature of the Property, and without limiting the generality of the foregoing: ... (iii) not enter into or permit to be entered into any contract or agreement or any transaction whatsoever in respect of the Property other than in the ordinary and usual course of business;"). Further, we are not

This is **Exhibit "D"** referred to in the affidavit of Alice Tsui made before me on this 26th day of January, 2024.


A Commissioner for taking Affidavits in
British Columbia

aware of any such sale (and expect that any such sale would be brought to our attention pursuant to PSA s. 4.2(p)). In addition, your letter does not identify actual hardship to an actual owner, evidence of which would be required for an application under s. 256.

Yours truly,

Dennis James Aitken LLP



Craig Dennis, K.C.

604-659-9480

cdennis@djacounsel.com

CPD/sc

c.c.: Edward Wilson
Jennifer Williams

January 22, 2024

Via Email (proberts@lawsonlundell.com)

Lawson Lundell LLP
1600 Cathedral Place
925 West Georgia St.
Vancouver, BC V6C 3L2

Attention: Peter Roberts, K.C. and Sarah Hannigan

Dear Sirs/Mesdames:

**Re: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289,
SCBC Vancouver Registry Action No. S-238586 (“Action”)**

We write further to the notice of application filed in the Action on January 12, 2024 seeking security for costs, among other relief.

We write to propose a resolution of the issue of security for defendants’ costs. The offer is without prejudice to any argument that 1038573 B.C. Ltd. (“573”) may advance at a contested hearing.

The proposed terms are as follows:

1. The security, as described below, will be held in a separate interest-bearing trust account of counsel for 573, with interest earned to the credit of the security, on the terms set out in this letter.
2. Upon written agreement to this proposal, and subject to paragraph 3, the security will consist of three payments:
 - a. a first payment of \$12,500 made not later than 30 days following written acceptance of this proposal;
 - b. a second payment of \$12,500, made not later than 14 days after responses to civil claim are filed by all of the defendants to the Action, less any costs incurred by 573 in retaining a process server to effect service on the defendants (up to a maximum reduction of \$7,500); and
 - c. a third payment of \$12,500 made not later than the later of (i) 60 days before the first day of trial or (ii) two days following the completion of a trial management conference, if one is scheduled to occur less than 60 days before the first day of trial.
3. The payments described in paragraph 2 will not be required to be made if, on the date payment is due, either

This is **Exhibit "E"** referred to in the affidavit

of Alice Tsui made before me on this 26th day of January, 2024.



A Commissioner for taking Affidavits in
British Columbia

- a. the Action has been dismissed or discontinued, or
 - b. any of the defendants is in breach of an obligation on a party under the *Supreme Court Civil Rules* and the plaintiff has, by the date payment is due, filed a notice of application seeking relief arising from the defendants' non-compliance (whether or not that application has been heard or determined).
4. Unless otherwise agreed by the parties, the security will be held in trust until the completion of the Action and not released except as follows:
- a. in the event the court awards costs of the Action to the defendants, then the security will be paid out to counsel for the defendants (or, if multiple law firms are retained by the defendants, then in equal shares to counsel for the defendants or in such other proportion as counsel for the defendants may jointly direct) up to the amount of the costs award, and if the amount of the security exceeds the amount of the costs award then the difference will be refunded to 573,
 - b. otherwise, upon resolution of the Action, whether by order of the court (including a consent order or discontinuance) or agreement, the security will be refunded to 573.

The above offer is made to reduce the parties' costs and avoid a contested hearing on the issue of security for costs. 573 reserves the right to rely on this letter at any contested hearing.

We look forward to hearing from you.

Yours truly,

Dennis James Aitken LLP




Craig Dennis, K.C.
604-659-9480

cdennis@djacounsel.com

CPD/sc

c.c.: Edward Wilson
Jennifer Williams

This is Exhibit "F" referred to in the affidavit of Alice Tsui made before me on this 26th day of January, 2024.


A Commissioner for taking Affidavits in
British Columbia

No. S-238586
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

1038573 B.C. LTD.

Plaintiff

AND:

THE OWNERS, STRATA PLAN NW289, JENNY DONNA DICKISON, FERNANDO MARCELINO DUTRA DE SOUSA, 1276331 B.C. LTD., CARMELIA MARIA DA SILVA, HON-CHING RUDOLPH CHENG, 1161359 B.C. LTD., RICKY HEE MENG LAI, PIA FACCIIO, 1184416 B.C. LTD., MARK WILLIAM LOUTTIT and SARAH KINUKO LOUTTIT, BARRY DOUGLAS WATSON, AS ADMINISTRATOR OF THE ESTATE OF KENNETH JOHN WATSON, LI PING DUAN, NORMAN VICTOR LEECH, ROLANDO VINAS DIZON and NARCISA DIZON, NICHOLAS GEORGE KARAMOUZOS and MARIA KARAMOUZOS, CUI MING CHEN, YANKUI WANG and XIN TIAN, MARIA DA NATIVIDADE ALMEIDA, 1237765 B.C. LTD., JU-SHAN CHIANG and FLORA FU, 1184414 B.C. LTD., AMARSINGH BHATIA and NARANJAN KAUR BHATIA, PHUNG KIM VUONG and TUONG LAM, MONICA PAOLA ALIAGA, MARCELINO LOPES DE SOUSA and OLGA MARIA DUTRA DE SOUSA, 1184413 B.C. LTD., LUALHATI ONGKEKO CRISOSTOMO, RICHARD RAYMOND RAVENSBERGEN and DAWN MARIE RAVENSBERGEN, YUK FAR CHEUNG and YIN ON CHEUNG, GARY LUCIEN DREES, THOMAS PATRICK FLEMING, 1352962 B.C. LTD., WAN CHEN and HONG YANG, SU JUAN SITU, VAN DAO NGUYEN and THI BICH HANG NGUYEN, JULIAN BOZSIK, CHRISTIAN HERBERT JOSON-LIM and IRIS JUNE CALIBUGAN ADIONG, ANGELA JOY EYKELBOSH, NGUYEN THANH VUONG and TUYET NGOC DU, OM PARKASH LOOMBA and MERRAN LOOMBA, SUZANNE JUANITA KUDELSKI, YAN QIONG LU, PING HE, EDWARD LAWRENCE THUE, RICHARD CHARLES PATRICK SPENCER and DIANE MARIE SPENCER, ARTHUR SUMMERS WILLIAMSON, GARY DALE CHARTER and CRISTINA RIMANDO GAPAL, JU TAI ZHOU and YU QING LI, ZHI HAO YANG, DAISY CUETO EVANGELISTA and MARIA CHERRY EVANGELISTA, MEGAN MARY BURGHALL, NASIM BHALOO, HUI LIN DONG and LI WANG, MANSOUR MESHKI, HSIANG CHIAO HUANG, GORDON WILLIAM PATERSON, YVONNE JO-ANNE ENGLAND, GRACE JOANNA LEVSEN, PING CHOR CHAN, SO FAN LEE and TAK TAI LUI

Defendants

1038573 B.C. LTD.

Defendant by way of Counterclaim

DRAFT BILL OF COSTS FOR PURPOSES OF SECURITY FOR COSTS APPLICATION

This is the bill of costs of: The defendant, The Owners, Strata Plan NW289 (prepared by the plaintiff and defendant by counterclaim, 1038573 B.C. Ltd.)

Tariff Scale B Unit value \$110

TARIFF ITEMS

Item	Description		# of Units Claimed by the Owners, Strata Plan NW289	Appropriate # of Units
		Min/Max		
<i>Instructions and Investigations</i>				
1	Correspondence, conferences, instructions, investigations or negotiations by a party until the start of the proceeding, for which provision is not made elsewhere in this tariff	[1-10]	5	N/A
2	Correspondence, conferences, instructions, investigations or negotiations by a party after the start of the proceeding to the completion of the trial or hearing, for which provision is not made elsewhere in this tariff	[1-30]	20	15
3	Correspondence, conferences, instructions, investigations or negotiations by a party after the trial or hearing to enforce any final order obtained in that trial or hearing, for which provision is not made elsewhere in this tariff	[1-10]	5	N/A
4	Instructions to an agent to appear at a trial, hearing, application, examination, reference, inquiry, assessment, or other analogous proceeding, if necessary or proper, and if held more than 40 km from the place where the instructing lawyer carries on business	[1]		
5	Process for obtaining a consent case plan order	[1-10]		
<i>Court Documents</i>				
6	All process, for which provision is not made elsewhere in this tariff, for commencing and prosecuting a proceeding	[1-10]		

Item	Description		# of Units Claimed by the Owners, Strata Plan NW289	Appropriate # of Units
7	All process, for which provision is not made elsewhere in this tariff, for defending a proceeding, and for commencing and prosecuting a counterclaim	[1-10]	8	N/A
8	All process for which provision is not made elsewhere in this tariff for commencing and prosecuting or defending a third party proceeding	[1-10]		
9	Response to counterclaim and, if necessary, reply	[1-10]		
Discovery				
10	Process for obtaining discovery and inspection of documents			
	(a) 1 to 999 documents	[1-10]	8	5
	(b) 1 000 to 5 000 documents	[10-20]		
	(c) over 5 000 documents	[10-30]		
11	Process for giving discovery and inspection of documents			
	(a) 1 to 999 documents	[1-10]	8	5
	(b) 1 000 to 5 000 documents	[10-20]		
	(c) over 5 000 documents	[10-30]		
12	Process for serving interrogatories	[1-10]		
13	Process for answering interrogatories	[1-10]		
14	Process for serving notices to admit	[1-5]	3	N/A
15	Process for making admission of facts	[1-10]	5	N/A
16	Process for preparation of accounts, statement of property or financial information if required by enactment or by order of court	[1-5]		
Expert Evidence and Witnesses				

Item	Description		# of Units Claimed by the Owners, Strata Plan NW289	Appropriate # of Units
17	All process and correspondence associated with retaining and consulting all experts for the purposes of obtaining opinions for use in the proceeding	[1-10]		
18	All process and correspondence associated with contacting, interviewing and issuing subpoenas to all witnesses	[1-10]	5	N/A
Examinations				
19	Preparation for examination of a person coming under Item 20 for each day of attendance (a) by party conducting examination (2 days) (b) by party being examined (2 days)	[4] [3]	8 6	8 6
20	Attendance on examination of a person for discovery, on affidavit, on a subpoena to debtor, or in aid of execution, or of a person before trial under Rule 7-5 or 7-8, or any other analogous proceeding, for each day (a) by party conducting examination (2 days) (b) by party being examined (2 days)	[8] [5]	16 10	16 10
Applications, Hearings and Conferences				
21	Preparation for an application or other matter referred to in Item 22, for each day of hearing if hearing begun (a) if unopposed (b) if opposed	[2] [3]	3	N/A

Item	Description	# of Units Claimed by the Owners, Strata Plan NW289	Appropriate # of Units
22	Application, other than an application referred to in Item 23 or 27, for each day (a) if unopposed (b) if opposed	[4] [5]	5 N/A
23	Application by requisition or by written submission	[1-5]	
24	Preparation for a hearing referred to in Item 25, for each day of hearing	[3]	
25	Reference to, or inquiry, assessment, accounting or hearing before, or on appeal from, a master, registrar or special referee, with or without witnesses and whether before or after judgment, for each day	[6]	
26	Preparation for an application or other matter referred to in Item 27, for each day of hearing (a) if unopposed (b) if opposed	[4] [5]	
27	Hearing of proceeding, including petition, special case, proceeding on a point of law, stated case, interpleader or any other analogous proceeding, and applications for judgment under Rule 7-7 (6), 9-6 or 9-7, for each day (a) if unopposed (b) if opposed	[6] [10]	

Item	Description		# of Units Claimed by the Owners, Strata Plan NW289	Appropriate # of Units
28	Preparation for a hearing referred to in Item 22 (b), 25 or 27 (b), which hearing was initially contested but for which no attendance was required as a result of an agreement reached as to the issues that would have been the subject of the hearing (a) for a hearing referred to in Item 22 (b) (b) for a hearing referred to in Item 25 (c) for a hearing referred to in Item 27 (b)	 [2] [2] [4]		
29	Preparation for attendance referred to in Item 30, for each day of attendance	[2]	1	N/A
30	Attendance before a registrar to settle an order or to assess costs, for each day	[4]	2	N/A
31	Preparation for attendance referred to in Item 32, for each day of attendance	[1-3]	2	2
32	Attendance at a settlement conference, case planning conference or trial management conference	[1-5]	3	3
Public Guardian and Trustee				
33	All process for obtaining the comments and recommendations of the Public Guardian and Trustee	[1-10]		
Trial				
34	Preparation for trial, if proceeding set down for each day of trial	[5]	100 (based on a 20-day trial)	75 (based on a 15-day trial)
35	Attendance at trial of proceeding or of an issue in a proceeding, for each day	[10]	200 (based on a 20-day trial)	150 (based on a 15-day trial)
36	Written argument	[1-10]	8	7

Item	Description		# of Units Claimed by the Owners, Strata Plan NW289	Appropriate # of Units
37	Attendance at the court for trial or hearing if party is ready to proceed and when trial or hearing not started	[3]		
38	Attendance to speak to trial or hearing list	[1]		
Attendance at Registry				
39	Process for payment into or out of court	[1]		
40	Process for setting down proceeding for trial	[1]	1	N/A
41	Process relating to entry of an order or a certificate of costs when Item 30 or 44 does not apply	[1]	1	N/A
42	All process, for which provision is not made elsewhere in this tariff, relating to execution on or enforcement of an order, exclusive of any application to the court	[1]	1	N/A
Miscellaneous				
43	Conduct of sale if property sold by order of court	[1-10]		
44	Negotiations, including mediation, and process for settlement, discontinuance, or dismissal by consent of any proceeding if settled, discontinued, or dismissed by consent as a result of the negotiations	[5]		
45	Attendance at mediation, per day	[5]		
46	Preparation for a mediation, for each day of attendance	[3]		
47	Preparation for a mediation if the mediation is not held due to a reason other than the party's refusal, failure or neglect to attend	[3]		

Item	Description	# of Units Claimed by the Owners, Strata Plan NW289	Appropriate # of Units
48	Travel by a lawyer to attend at any trial, hearing, application, examination, reference, inquiry, assessment, or other analogous proceeding if held more than 40 km from the place where the lawyer carries on business, for each day on which the lawyer travels	[2]	
	Total Number of Units	434	302
	Multiply by unit value	\$110	\$110
	Subtotal	\$47,740.00	\$33,220.00
	Tax (PST 7%)	\$3,341.80	\$2,325.40
	Tax (GST 5%)	\$2,387.00	\$1,661.00
	Total	\$53,468.80	\$37,206.40

DISBURSEMENTS

Description	Disbursements Claimed	Appropriate Disbursements
Non-Taxable		
Total Non-Taxable Disbursements	\$0	\$0
Taxable		
	\$15,000 claimed for "[e]stimated disbursements, including court filing fees, discovery fees and transcripts, agent's filing and search fees, photocopies, document reproduction, research, delivery charges, etc."	\$500 for photocopying and filing/search fees
		\$2,000 for court reporter fees (Defendant conducting two days of examination for discovery),

	Description	Disbursements Claimed	Appropriate Disbursements
	Subtotal	\$15,000	\$2,500
	Tax (GST 5%)	\$1,800 (claimed based on 12% tax rate)	\$125
	Total Taxable Disbursements	\$16,800	\$2,625
	Total (Tariff Items + Disbursements)	\$70,268.80	\$39,831.40

Registrar: _____

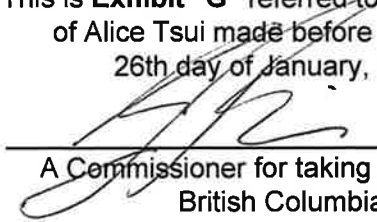
This bill of costs was prepared by Dennis James Aitken LLP, Barristers and Solicitors, whose address for service is #800 – 543 Granville Street, Vancouver, BC V6C 1X8. Telephone: 604.659.9479. Fax Number: 604.282.7824.

January 26, 2024

Via Email (proberts@lawsonlundell.com;
shannigan@lawsonlundell.com)

Lawson Lundell LLP
1600 Cathedral Place
925 West Georgia St.
Vancouver, BC V6C 3L2

This is **Exhibit "G"** referred to in the affidavit of Alice Tsui made before me on this 26th day of January, 2024.


A Commissioner for taking Affidavits in
British Columbia

Attention: Peter Roberts, K.C. and Sarah Hannigan

Dear Sirs/Mesdames:

**Re: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289,
SCBC Vancouver Registry Action No. S-238586 ("Action")**

We write further to your letter of January 25, 2024 concerning Strata Lot 86 and its owners – Daisy Cueto Evangelista and Maria Cherry Evangelista (the "**Lot 86 Owners**") – and our intervening correspondence. We have now had the opportunity to take instructions in respect of your letter.

We understand that you are acting on behalf of the Lot 86 Owners in respect of this issue.

We are instructed to make the following offer which should alleviate the concerns expressed in your letter. This offer is without prejudice to any argument which our client may make at the hearing of the Strata Corporation's notice of application filed January 12, 2024.

The offer is as follows:

1. The Lot 86 Owners acknowledge having been served with the notice of civil claim filed in the Action on December 18, 2023.
2. 1038573 B.C. Ltd. ("**573**") will discharge the CPL from Strata Lot 86 in order to permit financing by the Lot 86 Owners, on the condition that:
 - a. the CPL will be re-registered on Strata Lot 86 (subject to the possibility of a court order to the contrary obtained further to the Strata Corporation's notice of application) as soon as the financing has occurred and in any event by not later than February 9, 2024; and
 - b. in the interim period, there shall be no charges registered against Strata Lot 86 except for the contemplated financing charge.
3. The Lot 86 Owners shall pay any disbursements incurred by 573 at the Land Title Office in discharging and re-registering the CPL on Strata Lot 86.

We look forward to hearing from you.

Yours truly,

Dennis James Aitken LLP

A handwritten signature in blue ink, appearing to read 'CD', is positioned above the typed name.

Craig Dennis, K.C.

604-659-9480

cdennis@djacounsel.com

CPD/sc

c.c.: Jennifer Williams