



This is the 2<sup>nd</sup> affidavit of Alice Tsui  
in this case and was made on  
February 22, 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 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

**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 in this affidavit, 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 **Exhibits "A", "B", "C", "D", "E", "F" and "G"** are corporate searches for 1161359 B.C. Ltd., 1276331 B.C. Ltd., 1184416 B.C. Ltd., 1237765 B.C. Ltd., 1184414 B.C. Ltd., 1184413 B.C. Ltd. and 1352962 B.C. Ltd., respectively.

3. Attached to my affidavit and marked as **Exhibit "H"** is a copy of the notice of trial in respect of Vancouver Registry Action No. S-204200, filed on December 11, 2023.

4. On February 8 and February 16, 2024, Craig Dennis, K.C., counsel for 573, wrote by email to Sarah Hannigan, counsel for the defendant The Owners, Strata Plan NW289 (the "**Strata Corporation**"), to request that the Strata Corporation put forward a representative for examination for discovery. Attached and marked as **Exhibit "I"** to my affidavit is a copy of Mr. Dennis' February 8, 2024 email, and attached and marked as **Exhibit "J"** to my affidavit is a copy of Mr. Dennis' February 16, 2024 email.

5. On February 14, 2024, the Strata Corporation issued a list of documents in this action. Attached and marked as **Exhibit "K"** is a copy of the Strata Corporation's list of documents.

6. On February 20, 2024, Ray Power, counsel for 573, reiterated the request that the Strata Corporation put forward a representative for discovery and made a request for further document





BC Registry  
Services

Mailing Address:  
PO Box 9431 Stn Prov Govt  
Victoria BC V8W 9V3  
[www.corporateonline.gov.bc.ca](http://www.corporateonline.gov.bc.ca)

Location:  
2nd Floor - 940 Blanshard Street  
Victoria BC  
1 877 526-1526

## BC Company Summary

For  
**1161359 B.C. LTD.**

**Date and Time of Search:** February 21, 2024 09:50 AM Pacific Time

**Currency Date:** December 07, 2023

### ACTIVE

**Incorporation Number:** BC1161359

**Name of Company:** 1161359 B.C. LTD.

**Business Number:** 757898515 BC0001

**Recognition Date and Time:** Incorporated on April 23, 2018 08:35 AM Pacific Time

**In Liquidation:** No

**Last Annual Report Filed:** April 23, 2023

**Receiver:** No

### REGISTERED OFFICE INFORMATION

**Mailing Address:**

206 - 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

**Delivery Address:**

206 - 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

### RECORDS OFFICE INFORMATION

**Mailing Address:**

206 - 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

**Delivery Address:**

206 - 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

### DIRECTOR INFORMATION

**Last Name, First Name, Middle Name:**

Grewal, David (Devinder)

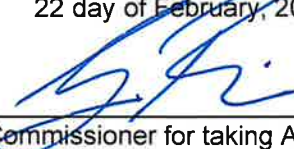
**Mailing Address:**

1100 - 510 BURNARD STREET  
VANCOUVER BC V6C 3A8  
CANADA

**Delivery Address:**

1100 - 510 BURNARD STREET  
VANCOUVER BC V6C 3A8  
CANADA

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

  
A Commissioner for taking Affidavits in  
British Columbia

**Last Name, First Name, Middle Name:**

Sun, Helen Chan

**Mailing Address:**

241 - 1489 MARINE DRIVE  
WEST VANCOUVER BC V7T 1B8  
CANADA

**Delivery Address:**

241 - 1489 MARINE DRIVE  
WEST VANCOUVER BC V7T 1B8  
CANADA

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NO OFFICER INFORMATION FILED AS AT April 23, 2023.

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BC Registry  
Services

Mailing Address:  
PO Box 9431 Stn Prov Govt  
Victoria BC V8W 9V3  
[www.corporateonline.gov.bc.ca](http://www.corporateonline.gov.bc.ca)

Location:  
2nd Floor - 940 Blanshard Street  
Victoria BC  
1 877 526-1526

## BC Company Summary

For  
1276331 B.C. LTD.

**Date and Time of Search:** February 21, 2024 09:51 AM Pacific Time  
**Currency Date:** December 07, 2023

### ACTIVE

**Incorporation Number:** BC1276331  
**Name of Company:** 1276331 B.C. LTD.  
**Business Number:** 797866944 BC0001  
**Recognition Date and Time:** Incorporated on November 25, 2020 03:52 PM Pacific Time  
**Last Annual Report Filed:** November 25, 2023  
**In Liquidation:** No  
**Receiver:** No

### REGISTERED OFFICE INFORMATION

**Mailing Address:**  
SUITE 2300, BENTALL 5  
550 BURRARD STREET  
VANCOUVER BC V6C 2B5  
CANADA

**Delivery Address:**  
SUITE 2300, BENTALL 5  
550 BURRARD STREET  
VANCOUVER BC V6C 2B5  
CANADA

### RECORDS OFFICE INFORMATION

**Mailing Address:**  
SUITE 2300, BENTALL 5  
550 BURRARD STREET  
VANCOUVER BC V6C 2B5  
CANADA

**Delivery Address:**  
SUITE 2300, BENTALL 5  
550 BURRARD STREET  
VANCOUVER BC V6C 2B5  
CANADA


### DIRECTOR INFORMATION

**Last Name, First Name, Middle Name:**  
Chauhan, Kulwant Singh

**Mailing Address:**  
2233 WEST 35TH AVENUE  
VANCOUVER BC V6M 1J4  
CANADA

**Delivery Address:**  
2233 WEST 35TH AVENUE  
VANCOUVER BC V6M 1J4  
CANADA

This is **Exhibit "B"** referred to in the affidavit  
of Alice Tsui made before me on this  
22 day of February, 2024.

  
A Commissioner for taking Affidavits in  
British Columbia

**Last Name, First Name, Middle Name:**

Shaw, Theresa

**Mailing Address:**

SUITE 206 - 1080 MAINLAND STREET  
VANCOUVER BC V6B 2T4  
CANADA

**Delivery Address:**

SUITE 206 - 1080 MAINLAND STREET  
VANCOUVER BC V6B 2T4  
CANADA

---

**OFFICER INFORMATION AS AT November 25, 2023**

**Last Name, First Name, Middle Name:**

Chauhan, Kulwant Singh

**Office(s) Held:** (President)

**Mailing Address:**

2233 WEST 35TH AVENUE  
VANCOUVER BC V6M 1J4  
CANADA

**Delivery Address:**

2233 WEST 35TH AVENUE  
VANCOUVER BC V6M 1J4  
CANADA

---

**Last Name, First Name, Middle Name:**

Shaw, Theresa

**Office(s) Held:** (Secretary)

**Mailing Address:**

SUITE 206 - 1080 MAINLAND STREET  
VANCOUVER BC V6B 2T4  
CANADA

**Delivery Address:**

SUITE 206 - 1080 MAINLAND STREET  
VANCOUVER BC V6B 2T4  
CANADA

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BC Registry  
Services

Mailing Address:  
PO Box 9431 Stn Prov Govt  
Victoria BC V8W 9V3  
[www.corporateonline.gov.bc.ca](http://www.corporateonline.gov.bc.ca)

Location:  
2nd Floor - 940 Blanshard Street  
Victoria BC  
1 877 526-1526

## BC Company Summary

For  
**1184416 B.C. LTD.**

**Date and Time of Search:** February 21, 2024 09:52 AM Pacific Time

**Currency Date:** December 07, 2023

This is Exhibit "C" referred to in the affidavit  
of Alice Tsui made before me on this  
22 day of February, 2024.

### ACTIVE

**Incorporation Number:** BC1184416

**Name of Company:** 1184416 B.C. LTD.

**Business Number:** 727737314 BC0001

**Recognition Date and Time:** Incorporated on October 25, 2018 02:26 PM Pacific Time **In Liquidation:** No

**Last Annual Report Filed:** October 25, 2023 **Receiver:** No

A Commissioner for taking Affidavits in  
British Columbia

### REGISTERED OFFICE INFORMATION

**Mailing Address:**  
206 - 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

**Delivery Address:**  
206 - 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

### RECORDS OFFICE INFORMATION

**Mailing Address:**  
206 - 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

**Delivery Address:**  
206 - 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

### DIRECTOR INFORMATION

**Last Name, First Name, Middle Name:**  
Grewal, Devinder Singh

**Mailing Address:**  
1130-1185 WEST GEORGIA STREET  
VANCOUVER BC V6E 4E6  
CANADA

**Delivery Address:**  
1130-1185 WEST GEORGIA STREET  
VANCOUVER BC V6E 4E6  
CANADA

NO OFFICER INFORMATION FILED AS AT October 25, 2023.





BC Registry  
Services

Mailing Address:  
PO Box 9431 Stn Prov Govt  
Victoria BC V8W 9V3  
[www.corporateonline.gov.bc.ca](http://www.corporateonline.gov.bc.ca)

Location:  
2nd Floor - 940 Blanshard Street  
Victoria BC  
1 877 526-1526

## BC Company Summary

For  
**1237765 B.C. LTD.**

**Date and Time of Search:** February 21, 2024 09:53 AM Pacific Time

**Currency Date:** December 07, 2023

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

**ACTIVE**

**Incorporation Number:** BC1237765

**Name of Company:** 1237765 B.C. LTD.

**Business Number:** 751559279 BC0001

**Recognition Date and Time:** Incorporated on January 19, 2020 10:13 PM Pacific Time **In Liquidation:** No

**Last Annual Report Filed:** January 19, 2021 **Receiver:** No

A Commissioner for taking Affidavits in  
British Columbia

### REGISTERED OFFICE INFORMATION

**Mailing Address:**

268 8191 WESTMINSTER HWY  
RICHMOND BC V6X 1A7  
CANADA

**Delivery Address:**

268 8191 WESTMINSTER HWY  
RICHMOND BC V6X 1A7  
CANADA

### RECORDS OFFICE INFORMATION

**Mailing Address:**

268 8191 WESTMINSTER HWY  
RICHMOND BC V6X 1A7  
CANADA

**Delivery Address:**

268 8191 WESTMINSTER HWY  
RICHMOND BC V6X 1A7  
CANADA

### DIRECTOR INFORMATION

**Last Name, First Name, Middle Name:**

Chao, Zhang

**Mailing Address:**

268 8191 WESTMINSTER HWY  
RICHMOND BC V6X 1A7  
CANADA

**Delivery Address:**

268 8191 WESTMINSTER HWY  
RICHMOND BC V6X 1A7  
CANADA

NO OFFICER INFORMATION FILED AS AT January 19, 2021.



BC Registry  
Services

Mailing Address:  
PO Box 9431 Stn Prov Govt  
Victoria BC V8W 9V3  
[www.corporateonline.gov.bc.ca](http://www.corporateonline.gov.bc.ca)

Location:  
2nd Floor - 940 Blanshard Street  
Victoria BC  
1 877 526-1526

## BC Company Summary

For  
**1184414 B.C. LTD.**

**Date and Time of Search:** February 21, 2024 09:54 AM Pacific Time

**Currency Date:** December 07, 2023

This is **Exhibit "E"** referred to in the affidavit  
of Alice Tsui made before me on this  
22 day of February, 2024.

**ACTIVE**

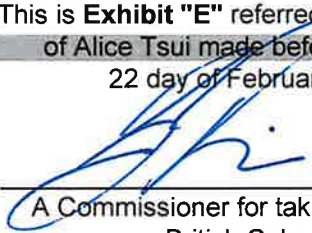
**Incorporation Number:** BC1184414

**Name of Company:** 1184414 B.C. LTD.

**Business Number:** 728890484 BC0001

**Recognition Date and Time:** Incorporated on October 25, 2018 02:24 PM Pacific Time **In Liquidation:** No

**Last Annual Report Filed:** October 25, 2023 **Receiver:** No

  
A Commissioner for taking Affidavits in  
British Columbia

### REGISTERED OFFICE INFORMATION

**Mailing Address:**  
206 - 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

**Delivery Address:**  
206 - 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

### RECORDS OFFICE INFORMATION

**Mailing Address:**  
206 - 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

**Delivery Address:**  
206 - 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

### DIRECTOR INFORMATION

**Last Name, First Name, Middle Name:**  
Grewal, Devinder Singh

**Mailing Address:**  
206 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

**Delivery Address:**  
206 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

NO OFFICER INFORMATION FILED AS AT October 25, 2023.



BC Registry  
Services

Mailing Address:  
PO Box 9431 Stn Prov Govt  
Victoria BC V8W 9V3  
[www.corporateonline.gov.bc.ca](http://www.corporateonline.gov.bc.ca)

Location:  
2nd Floor - 940 Blanshard Street  
Victoria BC  
1 877 526-1526

## BC Company Summary

For  
**1184413 B.C. LTD.**

**Date and Time of Search:** February 21, 2024 09:55 AM Pacific Time

**Currency Date:** December 07, 2023

### ACTIVE

**Incorporation Number:** BC1184413

**Name of Company:** 1184413 B.C. LTD.

**Business Number:** 728890880 BC0001

**Recognition Date and Time:** Incorporated on October 25, 2018 02:22 PM Pacific Time **In Liquidation:** No

**Last Annual Report Filed:** October 25, 2023 **Receiver:** No

### REGISTERED OFFICE INFORMATION

**Mailing Address:**  
206 - 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

**Delivery Address:**  
206 - 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

### RECORDS OFFICE INFORMATION

**Mailing Address:**  
206 - 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

**Delivery Address:**  
206 - 55 WATER STREET  
VANCOUVER BC V6B 1A1  
CANADA

### DIRECTOR INFORMATION


**Last Name, First Name, Middle Name:**

Bajwa, Sarbjit

**Mailing Address:**  
15303 58A AVE  
SURREY BC V3S 9H6  
CANADA

**Delivery Address:**  
15303 58A AVE  
SURREY BC V3S 9H6  
CANADA

This is **Exhibit "F"** referred to in the affidavit  
of Alice Tsui made before me on this  
22 day of February, 2024.

  
A Commissioner for taking Affidavits in  
British Columbia

**Last Name, First Name, Middle Name:**

Grewal, Devinder Singh

**Mailing Address:**

1130-1185 WEST GEORGIA STREET  
VANCOUVER BC V6E 4E6  
CANADA

**Delivery Address:**

1130-1185 WEST GEORGIA STREET  
VANCOUVER BC V6E 4E6  
CANADA

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NO OFFICER INFORMATION FILED AS AT October 25, 2023.

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BC Registry  
Services

Mailing Address:  
PO Box 9431 Stn Prov Govt  
Victoria BC V8W 9V3  
[www.corporateonline.gov.bc.ca](http://www.corporateonline.gov.bc.ca)

Location:  
2nd Floor - 940 Blanshard Street  
Victoria BC  
1 877 526-1526

## BC Company Summary

For  
**1352962 B.C. LTD.**

**Date and Time of Search:** February 21, 2024 09:55 AM Pacific Time

**Currency Date:** December 07, 2023

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

**ACTIVE**

**Incorporation Number:** BC1352962

**Name of Company:** 1352962 B.C. LTD.

**Business Number:** 742051907 BC0001

**Recognition Date and Time:** Incorporated on March 14, 2022 11:14 AM Pacific Time

**Last Annual Report Filed:** Not Available

  
A Commissioner for taking Affidavits in  
British Columbia

**In Liquidation:** No

**Receiver:** No

### REGISTERED OFFICE INFORMATION

**Mailing Address:**

SUITE 2300, BENTALL 5  
550 BURRARD STREET  
VANCOUVER BC V6C 2B5  
CANADA

**Delivery Address:**

SUITE 2300, BENTALL 5  
550 BURRARD STREET  
VANCOUVER BC V6C 2B5  
CANADA

### RECORDS OFFICE INFORMATION

**Mailing Address:**

SUITE 2300, BENTALL 5  
550 BURRARD STREET  
VANCOUVER BC V6C 2B5  
CANADA

**Delivery Address:**

SUITE 2300, BENTALL 5  
550 BURRARD STREET  
VANCOUVER BC V6C 2B5  
CANADA

### DIRECTOR INFORMATION

**Last Name, First Name, Middle Name:**

Chauhan, Kulwant

**Mailing Address:**

2233 WEST 35TH AVENUE  
VANCOUVER BC V6M 1J4  
CANADA

**Delivery Address:**

2233 WEST 35TH AVENUE  
VANCOUVER BC V6M 1J4  
CANADA

NO OFFICER INFORMATION FILED .



NO S-204200  
VANCOUVER REGISTRY

**THE SUPREME COURT OF BRITISH COLUMBIA**

BETWEEN:

COMMUNITY FIRE PREVENTION LTD.

PLAINTIFF

AND:

THE OWNERS, STRATA PLAN NW289, ARMAAN DHALLA, DAVID GREWAL,  
JOHNNY CHI HO TSANG, LEON ZHANG, SARBJIT BAJWA, 1161359 B.C. LTD., 1184413  
B.C. LTD., 1184414 B.C. LTD., 1184416 B.C. LTD., 1237765 B.C. LTD.

DEFENDANTS

AND:

BAYSIDE PROPERTY SERVICES LTD and CITY OF BURNABY

THIRD PARTIES

**NOTICE OF TRIAL**

**Filed by:** The Plaintiff, Community Fire Prevention Ltd.

TAKE NOTICE that the trial of this proceeding has been set down at the following place, date and time:

<b>City</b>	Vancouver
<b>Address of Courthouse</b>	800 Smithe Street
<b>Date [dd/mmm/yyyy]</b>	14/APR/2025
<b>Time</b>	10 days


The place of trial set out above is the place of trial set out in the notice of civil claim. Digitally signed by  
Harris, Kirby

All parties of record in this action agree that not more than 10 days is a reasonable time for the hearing of all evidence and argument in this action.

Date: December 11, 2023

This is **Exhibit "H"** referred to in the affidavit of Alice Tsui made before me on this 22 day of February, 2024.

  
\_\_\_\_\_  
Signature of lawyer for Plaintiff  
Silvano S. Todesco

  
\_\_\_\_\_  
A Commissioner for taking Affidavits in  
British Columbia

Contact information for the parties and their lawyers is as follows:

**Counsel for the Plaintiff, Community Fire Prevention Ltd.**

Silvano S. Todesco  
 Citadel Law Corporation  
 1400 - 1125 Howe Street  
 Vancouver, BC V6Z 2K8  
 Direct: 604-9459-9893  
 Tel: 604-945-9990  
 Fax: 604-688-0933  
 Email: [stodesco@citadellawyers.ca](mailto:stodesco@citadellawyers.ca)  
 Assistant: Elynne Zhu [ezhu@citadellawyers.ca](mailto:ezhu@citadellawyers.ca)

**Counsel for the Defendants.**

**Armaan Dhalla, David Grewal, Johnny Chi Ho Tsang, Leong Zhang, Sarbjit Bajwa**

Paul G. Mendes  
 Lesperance Mendes  
 Suite 550 – 900 Howe Street  
 Vancouver, BC V6Z 2M4  
 Direct: 604-685-4894  
 Tel: 604-685-3567  
 Fax: 604-685-7505  
 Email: [pgm@lmlaw.ca](mailto:pgm@lmlaw.ca)  
 Assistant: Dilpreet Brar [dkb@lmlaw.ca](mailto:dkb@lmlaw.ca)

**Counsel for the Defendants,**

**David Grewal, 1161359 B.C. LTD., 1184413 B.C. LTD., I 184414 B.C. LTD., 1184416 B.C. LTD.**

Michelle E. Guy  
 Guardian Law Corporation  
 1130 – 1185 W Georgia Street  
 Vancouver, BC V6E 4E6  
 Tel: 604-901-3477  
 Email: [mguy@guardian-law.ca](mailto:mguy@guardian-law.ca)  
 Assistant: Ciara Bosdachin [cbosdachin@guardian-law.ca](mailto:cbosdachin@guardian-law.ca)

**Counsel for Third Party, Bayside Property Services Ltd.**

Amy Peck  
 Whitelaw Twining  
 2400 – 200 Granville Street  
 Vancouver, BC V6C 1S4  
 Tel: 604-682-5466  
 Direct: 604-891-7256  
 Fax: 604-682-5217  
 Email: [apeck@wt.ca](mailto:apeek@wt.ca)  
 Assistant: Breanna Morris [BMorris@wt.ca](mailto:BMorris@wt.ca)

**Counsel for Defendant, Strata Corporation NW289  
(Counsel that filed the Third Party Notice to add Bayside and Burnaby)**

Shaun Driver  
Boughton Law Corporation  
700 – 595 Burrard Street  
Vancouver, BC V7X 1S8  
Tel: 604-687-3789  
Fax: 604-683-5317  
Email: [sdriver@boughtonlaw.com](mailto:sdriver@boughtonlaw.com)  
Assistant: Melissa Pedron [mpedron@boughtonlaw.com](mailto:mpedron@boughtonlaw.com)

**Counsel for Third Party, City of Burnaby**

James E. Silvester  
City of Burnaby  
4949 Canada Way  
Burnaby, BC V5G 1M2  
Tel: 604-294-7235  
Fax: 604-294-7985  
Email: [james.silvester@burnaby.ca](mailto:james.silvester@burnaby.ca)  
Assistant: Bardaro, Paulina [paulina.bardaro@burnaby.ca](mailto:paulina.bardaro@burnaby.ca)

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**Appendix**

**Part 1: THIS CLAIM INVOLVES THE FOLLOWING:**

[x] a matter not listed here

**Part 2:**

*Builders Lien Act*, S.B.C. 1997, c. 45  
*Strata Property Act*, S.B.C. 1998, c. 43  
*Court Order Interest Act*, R.S.B.C., 1996, c. 79



**Alice Tsui**


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**From:** Craig Dennis  
**Sent:** Thursday, February 8, 2024 2:16 PM  
**To:** Sarah Hannigan; Ray Power  
**Cc:** Peter Roberts; jwilliams@mltaikins.com; Ashley Cheng; San Chan; Lorcan Magee  
**Subject:** RE: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 | SCBC Vancouver Registry Action No. S-238586

This is **Exhibit "I"** referred to in the affidavit of Alice Tsui made before me on this 22 day of February, 2024.

Sarah,

Coming back to you now on the second and third points in your email.

  
 A Commissioner for taking Affidavits in  
 British Columbia

I confirm that we are holding \$15,000 in trust as security for the defendants costs per our agreement. By that agreement, there will be no application for any further security prior to judgment on a summary trial. The \$15,000 will be held in a separate interest-bearing trust account, with interest earned to the credit of the security. Unless otherwise agreed, or the court otherwise orders, the security will be held until the conclusion of the Supreme Court proceeding and, in the event that the plaintiff is ordered to pay costs, will be applied towards that costs award; if the plaintiff is not ordered to pay costs, or if the costs award does not exhaust the security, then either the full amount, or the excess, as the case may be, shall be released to the plaintiff.

On scheduling the summary trial – as discussed, I am set to be in a lengthy hearing between mid-February and mid-March. Subject to what I will say below about time estimate and the procedural steps that will need to happen prior to the hearing, I can offer February 28<sup>th</sup> as a placeholder date in the event that my hearing adjourns. If my hearing adjourns by February 16, then we can continue to hold the 28<sup>th</sup> as a placeholder date, subject to the other matters discussed here. If, however, the hearing does not adjourn, then we will need to look for alternate dates regardless.

On time estimate, I am doubtful that the matter can be heard in regular chambers. You will recall Justice Crerar's skepticism that a summary trial could be heard in under two hours, and his comment that a hearing of the summary trial within the next few months would be reasonable. Particularly given our client's cooperation in relation to the recent financing issue that arose, there does not seem to be any urgency that would require us to sit in regular chambers on February 28<sup>th</sup> for a hearing that will undoubtedly take longer than two hours. I would suggest that we look for long chambers dates.

As the first call in opportunity comes next week, we should compare availability in April to see whether we have mutually convenient dates.

Further, and while reserving ultimately on suitability, our client will be entitled to document production and discovery before the hearing of the application. I expect to have our client's list of documents to you in the next week or so. When can we expect the strata's list of documents? And can you please put forward a potential representative for discovery, for our client to consider?

Craig Dennis, K.C.  
 (d) 604-659-9480  
 (m) 604-671-0461  
 (he/him)

DENNIS | JAMES | AITKEN

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

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**From:** Sarah Hannigan <shannigan@lawsonlundell.com>  
**Sent:** Thursday, February 8, 2024 1:41 PM  
**To:** Ray Power <rpower@djacounsel.com>; Craig Dennis <cdennis@djacounsel.com>  
**Cc:** Peter Roberts <proberts@lawsonlundell.com>; jwilliams@mltaikins.com; Ashley Cheng <acheng@lawsonlundell.com>; San Chan <schan@djacounsel.com>; Lorcan Magee <lmagee@lawsonlundell.com>  
**Subject:** RE: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 | SCBC Vancouver Registry Action No. S-238586

Hi Craig/Ray:

I am following up on points #2 (security for costs) and #3 (your availability for our summary trial application) raised in my email of February 1, 2024. Could you please advise?

Thanks,

Sarah Hannigan (she/her) | Associate  
Lawson Lundell LLP  
D 604.631.9144 | F 604.669.1620

**From:** Sarah Hannigan (3144) - 14Flr  
**Sent:** Friday, February 2, 2024 4:10 PM  
**To:** 'Ray Power' <rpower@djacounsel.com>; Craig Dennis <cdennis@djacounsel.com>  
**Cc:** Peter Roberts (3158) - 14Flr <proberts@lawsonlundell.com>; jwilliams@mltaikins.com; Ashley Cheng (3316) - 14Flr <acheng@lawsonlundell.com>; San Chan <schan@djacounsel.com>; Lorcan Magee (3332) - 17Flr <lmagee@lawsonlundell.com>  
**Subject:** RE: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 | SCBC Vancouver Registry Action No. S-238586

Hi Ray:

1. The CPL release letter and other documentation should be provided to the Evangelistas' conveyancing solicitor (Melissa Briones of Northham Law: [melissa@northham-law.com](mailto:melissa@northham-law.com)). Please keep us copied on correspondence.
2. The lender requires the CPL release letter today – could you please send that over asap?

Thanks,

Sarah Hannigan (she/her) | Associate  
Lawson Lundell LLP  
D 604.631.9144 | F 604.669.1620

**From:** Ray Power <rpower@djacounsel.com>  
**Sent:** Friday, February 2, 2024 3:55 PM  
**To:** Sarah Hannigan (3144) - 14Flr <shannigan@lawsonlundell.com>; Craig Dennis <cdennis@djacounsel.com>  
**Cc:** Peter Roberts (3158) - 14Flr <proberts@lawsonlundell.com>; jwilliams@mltaikins.com; Ashley Cheng (3316) - 14Flr

<[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>; Lorcan Magee (3332) - 17Flr  
<[lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com)>

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

**[THIS MESSAGE ORIGINATED FROM OUTSIDE OUR FIRM]**

Hi Sarah,

We now have instructions on point 1. We will follow up on points 2 and 3 next week.

We do not believe an undertaking is necessary or was ever contemplated. Our client will provide your office with a CPL release letter, as well as a new CPL registration form. Your office can deliver them to the LTO in close succession – CPL release letter first, then Form B mortgage, then new CPL. As it could take two weeks for the mortgage to be fully registered – and any number of other charges could be registered against the unit in the interim – this arrangement protects our client’s interest in the unit. If there are fees incurred in re-registering a CPL, our client will agree to pay that disbursement.

Ray

Ray Power  
(he/him)  
Associate

D: 604-659-9454

E: [rpower@djacounsel.com](mailto:rpower@djacounsel.com)

**DENNIS | JAMES | AITKEN**

800 – 543 Granville Street, Vancouver, BC V6C 1X8 | T: 604-659-9479 | [www.djacounsel.com](http://www.djacounsel.com)

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**From:** Sarah Hannigan <[shannigan@lawsonlundell.com](mailto:shannigan@lawsonlundell.com)>

**Sent:** Friday, February 2, 2024 1:35 PM

**To:** Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>

**Cc:** Peter Roberts <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>; [jwilliams@mltaikins.com](mailto:jwilliams@mltaikins.com); Ashley Cheng <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>; Lorcan Magee <[lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com)>; Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>

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

Hi Craig – could we please hear back from this afternoon regarding SL86? The owners’ lender requires confirmation that the CPL will be discharged asap.

Thanks,

Sarah Hannigan (she/her) | Associate  
Lawson Lundell LLP  
D 604.631.9144 | F 604.669.1620

**From:** Sarah Hannigan (3144) - 14Flr

**Sent:** Thursday, February 1, 2024 6:51 PM

**To:** Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>

Cc: Peter Roberts (3158) - 14Flr <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>; [jwilliams@maitaikins.com](mailto:jwilliams@maitaikins.com); Ashley Cheng (3316) - 14Flr <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>; Lorcan Magee (3332) - 17Flr <[lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com)>; Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>

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

Hi Craig,

I write in respect of a few matters arising from our hearing and discussions yesterday:

1. **Strata lot 86:** First (and most urgently) I am advised that the owners of SL86 (the Evangelistas) were able to extend their closing date to Tuesday, February 6, 2024. The CPL registered by your client against SL86 will need to be removed prior to closing. The owners' lender requires:
  - a) a copy of the CPL Release Letter for Instrument No. CB1083710 in favour of 1038573 B.C. Ltd. (as to PID 001-263-838 only); and
  - b) an undertaking that no further CPL is filed by 1038573 B.C. Ltd. over SL86 until the new (second) mortgage is fully registered (via letter from you).

Based on your comments yesterday, I understand that your client's discharge will no longer be conditional on: (i) acknowledgment of service of the NOCC (item 1 in your letter), or (ii) the Evangelistas' payment of disbursements associated with the discharge and re-registration of the CPL (item 2(b) in your letter). In respect of item 2(b) in your letter, there is already a first mortgage on title to SL86, but we trust this will not be an issue.

Please confirm your client's agreement to the above by tomorrow, as their lender requires confirmation in advance of the upcoming closing date.

2. **Security for costs:** Further to our discussion and agreement, please confirm your client's posting of \$15,000 for security for costs, without prejudice to the Liquidator's right to seek further security following the hearing of our summary trial application.
3. **Summary trial:** You mentioned your potential unavailability on February 21, 2024 for the hearing of our summary trial application. If that is the case, could you please provide us with the earliest alternative available dates on which you (or a colleague) are available?

Thanks,

Sarah Hannigan (she/her) | Associate  
Lawson Lundell LLP  
D 604.631.9144 | F 604.669.1620

**From:** Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>

**Sent:** Monday, January 29, 2024 1:27 PM

**To:** San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>; Sarah Hannigan (3144) - 14Flr <[shannigan@lawsonlundell.com](mailto:shannigan@lawsonlundell.com)>

**Cc:** Peter Roberts (3158) - 14Flr <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>; [jwilliams@maitaikins.com](mailto:jwilliams@maitaikins.com); Ashley Cheng (3316) - 14Flr <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; Lorcan Magee (3332) - 17Flr <[lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com)>; Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>

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

**[THIS MESSAGE ORIGINATED FROM OUTSIDE OUR FIRM]**

Hi Sarah,

The index looks fine to us. Thanks,

Ray

**Ray Power**  
(he/him)  
Associate

D: 604-659-9454

E: [rpower@djacounsel.com](mailto:rpower@djacounsel.com)

**DENNIS | JAMES | AITKEN**

CO-SOLE

800 – 543 Granville Street, Vancouver, BC V6C 1X8 | T: 604-659-9479 | [www.djacounsel.com](http://www.djacounsel.com)

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**From:** San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>

**Sent:** Monday, January 29, 2024 12:17 PM

**To:** Sarah Hannigan <[shannigan@lawsonlundell.com](mailto:shannigan@lawsonlundell.com)>

**Cc:** Peter Roberts <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>; [jwilliams@mltaikins.com](mailto:jwilliams@mltaikins.com); Ashley Cheng <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; Lorcan Magee <[lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com)>; Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>; Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>

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

Hi Sarah,

Please find attached the affidavit of Ms. Tsui.

Kind regards,

**San Chan**  
(she/her)  
Paralegal

D: 604-659-9483

E: [schan@djacounsel.com](mailto:schan@djacounsel.com)

**DENNIS | JAMES | AITKEN**

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**From:** Sarah Hannigan <[shannigan@lawsonlundell.com](mailto:shannigan@lawsonlundell.com)>

**Sent:** Monday, January 29, 2024 12:11 PM

**To:** Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>; San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>; Peter Roberts <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>

**Cc:** [jwilliams@mltaikins.com](mailto:jwilliams@mltaikins.com); Ashley Cheng <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; Lorcan Magee <[lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com)>; Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>

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

Hi Craig/Ray,

Unless I am mistaken I don't believe we have received Ms. Tsui's filed affidavit – could you please provide us with a copy?

I also attach a copy of the index to our application record, which we will submit for filing this afternoon pending any comments from your office.

Thanks,

Sarah Hannigan (she/her) | Associate  
Lawson Lundell LLP  
D 604.631.9144 | F 604.669.1620

**From:** Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>  
**Sent:** Monday, January 29, 2024 11:22 AM  
**To:** San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>; Peter Roberts (3158) - 14Flr <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>; Sarah Hannigan (3144) - 14Flr <[shannigan@lawsonlundell.com](mailto:shannigan@lawsonlundell.com)>  
**Cc:** [jwilliams@maitkins.com](mailto:jwilliams@maitkins.com); Ashley Cheng (3316) - 14Flr <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; Lorcan Magee (3332) - 17Flr <[lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com)>; Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>  
**Subject:** RE: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 | SCBC Vancouver Registry Action No. S-238586

[THIS MESSAGE ORIGINATED FROM OUTSIDE OUR FIRM]

Further to our letter below, please find attached a filed copy of our application response and a filed copy of Mr. Bhatia's affidavit.

Thank you,

Ray Power  
(he/him)  
Associate

D: 604-659-9454

E: [rpower@djacounsel.com](mailto:rpower@djacounsel.com)

**DENNIS | JAMES | AITKEN**

800 – 543 Granville Street, Vancouver, BC V6C 1X8 | T: 604-659-9479 | [www.djacounsel.com](http://www.djacounsel.com)

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**From:** San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>  
**Sent:** Friday, January 26, 2024 3:59 PM  
**To:** [proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com); Sarah Hannigan <[shannigan@lawsonlundell.com](mailto:shannigan@lawsonlundell.com)>  
**Cc:** [jwilliams@maitkins.com](mailto:jwilliams@maitkins.com); [acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com); [lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com); Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>; Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>  
**Subject:** 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 | SCBC Vancouver Registry Action No. S-238586

Good afternoon:

Please find attached our correspondence dated January 26, 2024, along with enclosures.

Kind regards,

San Chan  
(she/her)  
Paralegal

D: 604-659-9483

E: [schan@djacounsel.com](mailto:schan@djacounsel.com)

**DENNIS | JAMES | AITKEN**  
COUNSELL

800 – 543 Granville Street, Vancouver, BC V6C 1X8 | T: 604-659-9479 | [www.djacounsel.com](http://www.djacounsel.com)

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**Alice Tsui**

---

**From:** Craig Dennis  
**Sent:** Friday, February 16, 2024 7:19 PM  
**To:** Sarah Hannigan; Ray Power  
**Cc:** Peter Roberts; jwilliams@maitkins.com; Ashley Cheng; San Chan; Lorcan Magee  
**Subject:** RE: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 | SCBC Vancouver Registry Action No. S-238586

Sarah,

I called you this afternoon and left a message. Perhaps we can connect next week. The deliverables you asked about will come next week. We would like to know who you propose as a representative for examination for discovery and to schedule that. We also will be writing about documents missing from your list of documents delivered on Wednesday afternoon. In the meantime, have a good weekend.

**Craig Dennis, K.C.**


(d) 604-659-9480  
(m) 604-671-0461  
(he/him)

**DENNIS | JAMES | AITKEN**

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

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This is **Exhibit "J"** referred to in the affidavit of Alice Tsui made before me on this 22 day of February, 2024.



\_\_\_\_\_  
A Commissioner for taking Affidavits in  
British Columbia

**From:** Sarah Hannigan <shannigan@lawsonlundell.com>  
**Sent:** Friday, February 16, 2024 10:28 AM  
**To:** Craig Dennis <cdennis@djacounsel.com>; Ray Power <rpower@djacounsel.com>  
**Cc:** Peter Roberts <proberts@lawsonlundell.com>; jwilliams@maitkins.com; Ashley Cheng <acheng@lawsonlundell.com>; San Chan <schan@djacounsel.com>; Lorcan Magee <lmagee@lawsonlundell.com>  
**Subject:** RE: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 | SCBC Vancouver Registry Action No. S-238586

Hi Craig,

Could you please advise when we can expect to receive your (a) application response materials (which were due last week), and (b) list of documents?

Thanks,

Sarah Hannigan (she/her) | Associate  
Lawson Lundell LLP  
D 604.631.9144 | F 604.669.1620

**From:** Sarah Hannigan (3144) - 14Flr  
**Sent:** Thursday, February 8, 2024 4:47 PM



**To:** 'Craig Dennis' <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>; Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>  
**Cc:** Peter Roberts (3158) - 14Flr <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>; [jwilliams@mltaikins.com](mailto:jwilliams@mltaikins.com); Ashley Cheng (3316) - 14Flr <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>; Lorcan Magee (3332) - 17Flr <[lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com)>  
**Subject:** RE: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 | SCBC Vancouver Registry Action No. S-238586

Hi Craig,

Thanks for the response. We will adjourn our summary trial application to February 28 for the time being. However, please (a) keep us apprised of the status of your other hearing, and (b) advise if any of the other (capable) lawyers at your firm could attend on your client's behalf before March 15, 2024—the date on which your client is seeking specific performance of the PSA. In our view, our application should be heard before this date.

We are assembling our list of documents and will provide it to you shortly, likely next week.

Best,

Sarah Hannigan (she/her) | Associate  
 Lawson Lundell LLP  
 D 604.631.9144 | F 604.669.1620

**From:** Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>  
**Sent:** Thursday, February 8, 2024 2:16 PM  
**To:** Sarah Hannigan (3144) - 14Flr <[shannigan@lawsonlundell.com](mailto:shannigan@lawsonlundell.com)>; Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>  
**Cc:** Peter Roberts (3158) - 14Flr <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>; [jwilliams@mltaikins.com](mailto:jwilliams@mltaikins.com); Ashley Cheng (3316) - 14Flr <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>; Lorcan Magee (3332) - 17Flr <[lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com)>  
**Subject:** RE: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 | SCBC Vancouver Registry Action No. S-238586

**[THIS MESSAGE ORIGINATED FROM OUTSIDE OUR FIRM]**

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Sarah,

Coming back to you now on the second and third points in your email.

I confirm that we are holding \$15,000 in trust as security for the defendants costs per our agreement. By that agreement, there will be no application for any further security prior to judgment on a summary trial. The \$15,000 will be held in a separate interest-bearing trust account, with interest earned to the credit of the security. Unless otherwise agreed, or the court otherwise orders, the security will be held until the conclusion of the Supreme Court proceeding and, in the event that the plaintiff is ordered to pay costs, will be applied towards that costs award; if the plaintiff is not ordered to pay costs, or if the costs award does not exhaust the security, then either the full amount, or the excess, as the case may be, shall be released to the plaintiff.

On scheduling the summary trial – as discussed, I am set to be in a lengthy hearing between mid-February and mid-March. Subject to what I will say below about time estimate and the procedural steps that will need to happen prior to the hearing, I can offer February 28<sup>th</sup> as a placeholder date in the event that my hearing adjourns. If my hearing adjourns by February 16, then we can continue to hold the 28<sup>th</sup> as a placeholder date, subject to the other matters discussed here. If, however, the hearing does not adjourn, then we will need to look for alternate dates regardless.

On time estimate, I am doubtful that the matter can be heard in regular chambers. You will recall Justice Crerar's skepticism that a summary trial could be heard in under two hours, and his comment that a hearing of the summary trial within the next few months would be reasonable. Particularly given our client's cooperation in relation to the recent financing issue that arose, there does not seem to be any urgency that would require us to sit in regular chambers on February 28<sup>th</sup> for a hearing that will undoubtedly take longer than two hours. I would suggest that we look for long chambers dates.

As the first call in opportunity comes next week, we should compare availability in April to see whether we have mutually convenient dates.

Further, and while reserving ultimately on suitability, our client will be entitled to document production and discovery before the hearing of the application. I expect to have our client's list of documents to you in the next week or so. When can we expect the strata's list of documents? And can you please put forward a potential representative for discovery, for our client to consider?

Craig Dennis, K.C.

(d) 604-659-9480

(m) 604-671-0461

(he/him)

DENNIS JAMES AITKEN

---

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

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**From:** Sarah Hannigan <[shannigan@lawsonlundell.com](mailto:shannigan@lawsonlundell.com)>

**Sent:** Thursday, February 8, 2024 1:41 PM

**To:** Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>; Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>

**Cc:** Peter Roberts <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>; [jwilliams@m1taikins.com](mailto:jwilliams@m1taikins.com); Ashley Cheng

<[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>; Lorcan Magee <[lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com)>

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

Hi Craig/Ray:

I am following up on points #2 (security for costs) and #3 (your availability for our summary trial application) raised in my email of February 1, 2024. Could you please advise?

Thanks,

Sarah Hannigan (she/her) | Associate  
Lawson Lundell LLP  
D 604.631.9144 | F 604.669.1620

**From:** Sarah Hannigan (3144) - 14Flr

**Sent:** Friday, February 2, 2024 4:10 PM

**To:** 'Ray Power' <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>; Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>

**Cc:** Peter Roberts (3158) - 14Flr <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>; [jwilliams@m1taikins.com](mailto:jwilliams@m1taikins.com); Ashley Cheng (3316) - 14Flr

<[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>; Lorcan Magee (3332) - 17Flr

<[Imagee@lawsonlundell.com](mailto:Imagee@lawsonlundell.com)>

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

Hi Ray:

1. The CPL release letter and other documentation should be provided to the Evangelistas' conveyancing solicitor (Melissa Briones of Northam Law: [melissa@northam-law.com](mailto:melissa@northam-law.com)). Please keep us copied on correspondence.
2. The lender requires the CPL release letter today – could you please send that over asap?

Thanks,

Sarah Hannigan (she/her) | Associate  
Lawson Lundell LLP  
D 604.631.9144 | F 604.669.1620

**From:** Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>

**Sent:** Friday, February 2, 2024 3:55 PM

**To:** Sarah Hannigan (3144) - 14Flr <[shannigan@lawsonlundell.com](mailto:shannigan@lawsonlundell.com)>; Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>

**Cc:** Peter Roberts (3158) - 14Flr <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>; [jwilliams@maitkins.com](mailto:jwilliams@maitkins.com); Ashley Cheng (3316) - 14Flr <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>; Lorcan Magee (3332) - 17Flr <[Imagee@lawsonlundell.com](mailto:Imagee@lawsonlundell.com)>

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

**[THIS MESSAGE ORIGINATED FROM OUTSIDE OUR FIRM]**

Hi Sarah,

We now have instructions on point 1. We will follow up on points 2 and 3 next week.

We do not believe an undertaking is necessary or was ever contemplated. Our client will provide your office with a CPL release letter, as well as a new CPL registration form. Your office can deliver them to the LTO in close succession – CPL release letter first, then Form B mortgage, then new CPL. As it could take two weeks for the mortgage to be fully registered – and any number of other charges could be registered against the unit in the interim – this arrangement protects our client's interest in the unit. If there are fees incurred in re-registering a CPL, our client will agree to pay that disbursement.

Ray

Ray Power  
(he/him)  
Associate

D: 604-659-9454

E: [rpower@djacounsel.com](mailto:rpower@djacounsel.com)

**DENNIS | JAMES | AITKEN**

800 – 543 Granville Street, Vancouver, BC V6C 1X8 | T: 604-659-9479 | [www.djacounsel.com](http://www.djacounsel.com)

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**From:** Sarah Hannigan <[shannigan@lawsonlundell.com](mailto:shannigan@lawsonlundell.com)>  
**Sent:** Friday, February 2, 2024 1:35 PM  
**To:** Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>  
**Cc:** Peter Roberts <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>; [jwilliams@mltaikins.com](mailto:jwilliams@mltaikins.com); Ashley Cheng <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>; Lorcan Magee <[lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com)>; Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>  
**Subject:** RE: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 | SCBC Vancouver Registry Action No. S-238586

Hi Craig – could we please hear back from this afternoon regarding SL86? The owners' lender requires confirmation that the CPL will be discharged asap.

Thanks,

Sarah Hannigan (she/her) | Associate  
 Lawson Lundell LLP  
 D 604.631.9144 | F 604.669.1620

**From:** Sarah Hannigan (3144) - 14Flr  
**Sent:** Thursday, February 1, 2024 6:51 PM  
**To:** Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>  
**Cc:** Peter Roberts (3158) - 14Flr <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>; [jwilliams@mltaikins.com](mailto:jwilliams@mltaikins.com); Ashley Cheng (3316) - 14Flr <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>; Lorcan Magee (3332) - 17Flr <[lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com)>; Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>  
**Subject:** RE: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 | SCBC Vancouver Registry Action No. S-238586

Hi Craig,

I write in respect of a few matters arising from our hearing and discussions yesterday:

1. **Strata lot 86:** First (and most urgently) I am advised that the owners of SL86 (the Evangelistas) were able to extend their closing date to Tuesday, February 6, 2024. The CPL registered by your client against SL86 will need to be removed prior to closing. The owners' lender requires:
  - a) a copy of the CPL Release Letter for Instrument No. CB1083710 in favour of 1038573 B.C. Ltd. (as to PID 001-263-838 only); and
  - b) an undertaking that no further CPL is filed by 1038573 B.C. Ltd. over SL86 until the new (second) mortgage is fully registered (via letter from you).

Based on your comments yesterday, I understand that your client's discharge will no longer be conditional on: (i) acknowledgment of service of the NOCC (item 1 in your letter), or (ii) the Evangelistas' payment of disbursements associated with the discharge and re-registration of the CPL (item 2(b) in your letter). In respect of item 2(b) in your letter, there is already a first mortgage on title to SL86, but we trust this will not be an issue.

Please confirm your client's agreement to the above by tomorrow, as their lender requires confirmation in advance of the upcoming closing date.

2. **Security for costs:** Further to our discussion and agreement, please confirm your client's posting of \$15,000 for security for costs, without prejudice to the Liquidator's right to seek further security following the hearing of our summary trial application.
3. **Summary trial:** You mentioned your potential unavailability on February 21, 2024 for the hearing of our summary trial application. If that is the case, could you please provide us with the earliest alternative available dates on which you (or a colleague) are available?

Thanks,

Sarah Hannigan (she/her) | Associate  
Lawson Lundell LLP  
D 604.631.9144 | F 604.669.1620

**From:** Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>  
**Sent:** Monday, January 29, 2024 1:27 PM  
**To:** San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>; Sarah Hannigan (3144) - 14Flr <[shannigan@lawsonlundell.com](mailto:shannigan@lawsonlundell.com)>  
**Cc:** Peter Roberts (3158) - 14Flr <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>; [jwilliams@maitkins.com](mailto:jwilliams@maitkins.com); Ashley Cheng (3316) - 14Flr <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; Lorcan Magee (3332) - 17Flr <[lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com)>; Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>  
**Subject:** RE: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 | SCBC Vancouver Registry Action No. S-238586

[THIS MESSAGE ORIGINATED FROM OUTSIDE OUR FIRM]

Hi Sarah,

The index looks fine to us. Thanks,

Ray

Ray Power  
(he/him)  
Associate

D: 604-659-9454

E: [rpower@djacounsel.com](mailto:rpower@djacounsel.com)

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800 – 543 Granville Street, Vancouver, BC V6C 1X8 | T: 604-659-9479 | [www.djacounsel.com](http://www.djacounsel.com)

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**From:** San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>  
**Sent:** Monday, January 29, 2024 12:17 PM  
**To:** Sarah Hannigan <[shannigan@lawsonlundell.com](mailto:shannigan@lawsonlundell.com)>  
**Cc:** Peter Roberts <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>; [jwilliams@maitkins.com](mailto:jwilliams@maitkins.com); Ashley Cheng <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; Lorcan Magee <[lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com)>; Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>; Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>  
**Subject:** RE: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 | SCBC Vancouver Registry Action No. S-238586

Hi Sarah,

Please find attached the affidavit of Ms. Tsui.

Kind regards,

San Chan  
(she/her)

Paralegal

D: 604-659-9483

E: [schan@djacounsel.com](mailto:schan@djacounsel.com)

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**From:** Sarah Hannigan <[shannigan@lawsonlundell.com](mailto:shannigan@lawsonlundell.com)>

**Sent:** Monday, January 29, 2024 12:11 PM

**To:** Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>; San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>; Peter Roberts <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>

**Cc:** [jwilliams@mltaikins.com](mailto:jwilliams@mltaikins.com); Ashley Cheng <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; Lorcan Magee <[lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com)>; Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>

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

Hi Craig/Ray,

Unless I am mistaken I don't believe we have received Ms. Tsui's filed affidavit – could you please provide us with a copy?

I also attach a copy of the index to our application record, which we will submit for filing this afternoon pending any comments from your office.

Thanks,

Sarah Hannigan (she/her) | Associate  
Lawson Lundell LLP  
D 604.631.9144 | F 604.669.1620

**From:** Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>

**Sent:** Monday, January 29, 2024 11:22 AM

**To:** San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>; Peter Roberts (3158) - 14Flr <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>; Sarah Hannigan (3144) - 14Flr <[shannigan@lawsonlundell.com](mailto:shannigan@lawsonlundell.com)>

**Cc:** [jwilliams@mltaikins.com](mailto:jwilliams@mltaikins.com); Ashley Cheng (3316) - 14Flr <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>; Lorcan Magee (3332) - 17Flr <[lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com)>; Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>

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

**[THIS MESSAGE ORIGINATED FROM OUTSIDE OUR FIRM]**

Further to our letter below, please find attached a filed copy of our application response and a filed copy of Mr. Bhatia's affidavit.

Thank you,

Ray Power

(he/him)

Associate

D: 604-659-9454

E: [rpower@djacounsel.com](mailto:rpower@djacounsel.com)

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**From:** San Chan <[schan@djacounsel.com](mailto:schan@djacounsel.com)>**Sent:** Friday, January 26, 2024 3:59 PM**To:** [proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com); Sarah Hannigan <[shannigan@lawsonlundell.com](mailto:shannigan@lawsonlundell.com)>**Cc:** [jwilliams@mltaikins.com](mailto:jwilliams@mltaikins.com); [acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com); [lmagee@lawsonlundell.com](mailto:lmagee@lawsonlundell.com); Craig Dennis <[cdennis@djacounsel.com](mailto:cdennis@djacounsel.com)>; Ray Power <[rpower@djacounsel.com](mailto:rpower@djacounsel.com)>**Subject:** 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 | SCBC Vancouver Registry Action No. S-238586

Good afternoon:

Please find attached our correspondence dated January 26, 2024, along with enclosures.

Kind regards,

San Chan

(she/her)

Paralegal

D: 604-659-9483

E: [schan@djacounsel.com](mailto:schan@djacounsel.com)**DENNIS | JAMES | AITKEN**

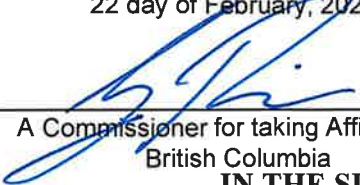
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This is **Exhibit "K"** referred to in the affidavit  
of Alice Tsui made before me on this  
22 day of February, 2024.

  
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, HONCHING RUDOLPH CHENG, 1161359 B.C. LTD., RICKY HEE MENG LAI, PIA FACCIO, 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

AND:

1038573 B.C. LTD.

DEFENDANT BY WAY OF COUNTERCLAIM



## LIST OF DOCUMENTS

**Prepared by:** The Owners, Strata Plan NW289 as represented by the liquidator, Crowe Mackay & Company Ltd. (the **Listing Party**)

**Part 1: DOCUMENTS THAT ARE OR HAVE BEEN IN THE LISTING PARTY'S POSSESSION OR CONTROL AND THAT COULD BE USED BY ANY PARTY AT TRIAL TO PROVE OR DISPROVE A MATERIAL FACT**

**Please see the attached Schedule "A", dated February 14, 2024.**

**Part 2: OTHER DOCUMENTS TO WHICH THE LISTING PARTY INTENDS TO REFER AT TRIAL**

NIL

**Part 3: DOCUMENTS THAT RELATE TO A MATTER IN QUESTION IN THE ACTION**

NIL

**Part 4: DOCUMENTS FOR WHICH PRIVILEGE FROM PRODUCTION IS CLAIMED**

The Listing Party objects to production of the documents described in this part on the grounds that they are privileged. Paragraphs (a), (b) and (c) below describe the three categories of privilege in relation to the documents listed in this Part. A reference to (a), (b) or (c) next to the listing indicates the ground or grounds of privilege claimed in relation to the specific document or group of documents.

### GROUND OF PRIVILEGE

#### Solicitor/Client Privilege

- (a) The documents are or record confidential communications between the Listing Party or their agents and the Listing Party's legal advisors for the purpose of obtaining legal advice or assistance.

NIL

#### Litigation Privilege

- (b) The documents are or record confidential communications between the Listing Party or their agents and the Listing Party's legal or professional advisors made for the dominant purpose of litigation at a time when litigation was contemplated or commenced; or

The documents are or record confidential communications between the Listing Party's legal or professional advisors, or between those legal or professional advisors and third parties, or between the Listing Party and third parties, made for the dominant purpose of litigation at a time when litigation was contemplated or commenced; or

The documents were prepared or brought into being by the Listing Party or its legal or professional advisors, or are copies of documents obtained from other parties or sources, for the dominant purpose of litigation at a time when litigation was contemplated or commenced.

Settlement Negotiation Privilege

- (c) The documents are or record confidential communications between the Listing Party, their agents, or their legal advisors and the opposing parties, their agent, or their advisors for the purpose of negotiating a settlement of an issue or issues between them.

**NIL**

**ONGOING CLAIM OF SOLICITOR/CLIENT, LITIGATION PRIVILEGE AND SETTLEMENT NEGOTIATION PRIVILEGE**

The Listing Party also claims privilege over documents created or coming into the Listing Party's or the Listing Party's solicitors possession after the date of this List of Documents in the following categories:

1. Documents consisting of or recording confidential communications between the Listing Party and the Listing Party's legal advisors for the purpose of giving the Listing Party legal advice in the context of this action;
2. Documents coming into being, prepared or coming into the possession of the Listing Party or their legal advisors, for the dominant purpose of this litigation, including drafts or pleadings, proofs of evidence, cases for the opinion of counsel, opinions of counsel and instructions to counsel prepared and given in anticipation and during the progress of this action, letters and copies of letters passing between the Listing Party and the Listing Party's counsel and memoranda made by the Listing Party's solicitors and the Listing Party's agents and experts for the purpose of defending/prosecuting the action (and prosecuting the counterclaim herein); and
3. Documents consisting of or recording confidential communications between the Listing Party, their agents, or their legal advisors and the opposing parties, their agent, or their advisors for the purpose of negotiating a settlement of an issue or issues between them.

TAKE NOTICE that the documents listed in Parts 1, 2 or 3 of this List of Documents that are not shown as no longer being in the Listing Party's possession or control may be inspected and copied, during normal business hours, at the offices of Lawson Lundell LLP, at 1600 – 925 West Georgia Street, Vancouver, British Columbia V6C 3L2.

Dated: February 14, 2024

**Implied undertaking to the court**

Documents produced are not to be used by the other parties except for the purposes of this litigation unless and until the scope of the undertaking is varied by a court order or other judicial order, consent or statutory override or a situation of immediate and serious danger emerges. This implied undertaking continues despite settlement or completion of the litigation.



---

Lawson Lundell LLP  
Solicitors for the Listing Party

This List of Documents is delivered by Peter J. Roberts, K.C. / Sarah B. Hannigan, of the law firm of Lawson Lundell LLP, whose place of business and address for delivery is 1600 – 925 West Georgia Street, Vancouver, British Columbia V6C 3L2.

Schedule "A"

PROD BEGDOC	Doc Date	Doc Type	Title	Author	Recipient
LIQ000001_0001	00/00/0000	Land Title Document	Application to Deposit Plan		
LIQ000002_0001	00/00/0000	Text Messages			
LIQ000003_0001	04/17/2020	Court Document	Notice of Civil Claim S204200		
LIQ000004_0001	05/20/2020	Court Document	Response to Civil Claim S204200		
LIQ000005_0001	09/23/2021	Court Document	Counterclaim S204200		
LIQ000006_0001	02/15/2022	Corporate Document	Certified Copy of Strata Corporation Resolutions	The Owners, Strata Plan NW289	
LIQ000007_0001	06/17/2022	Court Document	Order made after Application before Justice Wilman S223926		
LIQ000008_0001	12/07/2022	Agreement	Mutual Notice of Second Condition Satisfaction and/or Waiver	The Owners, Strata Plan NW289, 1038573 B.C. Ltd.	
LIQ000009_0001	05/24/2023	Meeting Minutes	Minutes of Special General Meeting		
LIQ000010_0001	10/22/2023	Agreement	Contract of Purchase and Sale	Jennifer M. Williams	Lisa Frey (3139) - 17Flr <lfray@lawsonlundell.com>
LIQ000011_0001	11/06/2023	Email	RE: Cameray Gardens - Contracts of Purchase and Sale	Jennifer M. Williams	Ed Wilson (3148) - 17Flr <ewilson@lawsonlundell.com>
LIQ000012_0001	11/16/2023	Email	Re: Cameray Garden	Jennifer M. Williams	Joanne Kwan <jkwan@mtaikins.com>;Margaret W. Kwan <mkwan@mtaikins.com>;Jennifer M. Williams <jwilliams@mtaikins.com>
LIQ000013_0001	11/20/2023	Email	RE: Cameray Gardens - Closing Documents	Jillian Sych (3327) - 17Flr	
LIQ000014_0001	12/10/2023	Company Summary	BC Company Summary for 1038573 B.C. Ltd.		
LIQ000015_0001	12/14/2023	Letter	Re: Financing to assist in the Purchasing of 3925 Kingsway and 5715 Jersey Avenue, Burnaby, BC	Abacus North Capital Ltd.	Belmont Pacific Development Group
LIQ000016_0001	12/15/2023	Letter	In the Matter of the Application for the Cancellation of Strata Plan NWS289 and the Dissolution of The Owners, Strata Plan NWS289 (the 'Strata Corporation'), In the Matter of Division 2 of Part 16 of the Strata Property Act, SBC 1998, C. 43; BCSC Action No. S-223926 (the 'Action') 3925 Kingsway and 5715 Jersey Avenue, Burnaby, B.C. (the 'Property')	Lawson Lundell LLP	New Westminster Land Title Office
LIQ000017_0001	12/15/2023	Form	BC Company Liquidator Appointment for The Owners, Strata Plan NWS289		
LIQ000018_0001	12/15/2023	Notice	Notice of Termination to Service Providers and Employees		
LIQ000019_0001	12/15/2023	Form	Property Transfer Tax Return		
LIQ000020_0001	12/19/2023	Letter	Re: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 and others, B.C.S.C. Vancouver Reg. No. S-238586 (the 'Action')	Lawson Lundell LLP	Dennis James Aitken
LIQ000021_0001	12/20/2023	Search Results	Supreme Court Civil Cases search result		
LIQ000022_0001	12/20/2023	Search Results	Personal Property Registry Search Result		
LIQ000023_0001	12/20/2023	Search Results	Title Search Results		
LIQ000024_0001	01/10/2024	Agreement	Contract of Purchase and Sale Addendum/Amendment		
LIQ000025_0001	01/23/2024	Email	Re: Cameray Gardens	Carly Erickson <carly@covermortgage.com>	Mylene Lim <mylene.mortgage@gmail.com>
LIQ000026_0001	01/25/2024	Email	Re: EVANGELISTA BAGUIO	Jody Ivanick <jody@aaarea.ac>	Mylene Lim <mylene.mortgage@gmail.com>
LIQ000027_0001	01/25/2024	Email	URGENT Cameray Gardens	Mylene Lim <mylene.mortgage@gmail.com>	Lisa Frey <lfray@lawsonlundell.com>
LIQ000028_0001	01/25/2024	Letter	Re: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289 and others, B.C.S.C. Vancouver Reg. No. S-238586	Lawson Lundell LLP	Dennis James Aitken LLP
LIQ000029_0001	10/06/2023	Email	RE: Cameray Gardens - Contracts of Purchase and Sale	Jillian Sych (3327) - 17Flr	Joanne Kwan <jkwan@mtaikins.com>;Margaret W. Kwan <mkwan@mtaikins.com>
LIQ000030_0001	05/25/2023	Email	RE: Cameray Gardens - Draft Subject Waiver	Lisa Frey (3139) - 17Flr	Jennifer Williams <jwilliams@harperegrey.com>
LIQ000031_0001	05/24/2023	Notice	Mutual Notice of Second Condition Satisfaction and/or Waiver		
LIQ000032_0001	09/28/2023	Email	RE: Cameray Gardens - Schedule A"	Jillian Sych (3327) - 17Flr	Jennifer M. Williams <jwilliams@mtaikins.com>;Margaret W. Kwan <mkwan@mtaikins.com>
LIQ000033_0001	09/22/2023	Email	Re: URGENT Cameray follow up - tax sale on Monday	Ed Wilson (3148) - 17Flr	Jennifer M. Williams <jwilliams@mtaikins.com>
LIQ000034_0001	00/00/0000	Table			
LIQ000035_0001	12/07/2023	Letter	Re: Cameray Gardens ('Property')	Dennis James Aitken	Lawson Lundell LLP
LIQ000036_0001	12/13/2023	Letter	Re: Cameray Gardens	Dennis James Aitken	Lawson Lundell LLP
LIQ000037_0001	12/18/2023	Letter	Re: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289, SCBC Vancouver Registry Action No. S-238586	Dennis James Aitken	Lawson Lundell LLP

Schedule "A"

PROD_BEGDOC	Doc Date	Doc Type	Title	Author	Recipient
LI0000038_0001	12/18/2023	Letter	Re: Cameray Gardens	Dennis James Aitken	Lawson Lundell LLP
LI0000039_0001	12/12/2023	Letter	Cameray Gardens ("Property")	Lawson Lundell LLP	Dennis James Aitken LLP
LI0000040_0001	12/18/2023	Letter	Re: 1038573 B.C. Ltd. v. The Owners, Strata Plan NW289, SCBC Vancouver Registry Action No. S-238586	Dennis James Aitken LLP	Lawson Lundell LLP
LI0000041_0001	12/18/2023	Letter	Re: Cameray Gardens - Purchase & Sale Agreement dated December 7, 2022 (the "PSA")	Dennis James Aitken LLP	MTL Aikins LLP
LI0000042_0001	12/07/2022	Agreement	Purchase and Sale Agreement	Lawson Lundell LLP	
LI0000043_0001	10/12/1998	Plan	Plan NWS289	The Owners, Strata Plan NW289,1038573 B.C. Ltd.	
LI0000044_0001	12/06/2023	Email	RE: Cameray Gardens	Lisa Frey (3139) - 17Flr	Jennifer M. Williams [jwilliams@mitaikins.com]
LI0000045_0001	01/29/2015	Mortgage Terms	MTL150002 Standard Mortgage Terms		
LI0000046_0001	10/25/2021	Title Search	SL 001 Unit 105 TITLE-BL36430-PID-001-262-921		
LI0000047_0001	10/25/2021	Title Search	SL 002 Unit 105 TITLE-CA4989601-PID-001-262-939		
LI0000048_0001	10/25/2021	Title Search	SL 003 Unit 107 TITLE-CA8716214-PID-001-262-947		
LI0000049_0001	10/25/2021	Title Search	SL 004 Unit 108 TITLE-BW200918-PID-001-262-963		
LI0000050_0001	10/25/2021	Title Search	SL 005 Unit 109 TITLE-CA1140650-PID-001-262-971		
LI0000051_0001	10/25/2021	Title Search	SL 006 Unit 110 TITLE-CA8716215-PID-001-262-980		
LI0000052_0001	10/12/2023	Title Search	SL 007 Unit 111 TITLE-CA7453017-PID-001-262-998		
LI0000053_0001	10/25/2021	Title Search	SL 008 Unit 112 TITLE-CA5381881-PID-001-263-005		
LI0000054_0001	05/23/2023	Title Search	SL 009 Unit 114 TITLE-BR186205-PID-000-938-530		
LI0000055_0001	10/12/2023	Title Search	SL 010 Unit 115 TITLE-CA7453018-PID-001-263-013		
LI0000056_0001	10/12/2023	Title Search	SL 011 Unit 116 TITLE-WX2117663-PID-001-263-021		
LI0000057_0001	10/18/2023	Title Search	SL 012 Unit 117 TITLE-CA7467872-PID-001-263-030		
LI0000058_0001	03/28/2022	Title Search	SL 013 Unit 118 TITLE-CA4595504-PID-001-263-048		
LI0000059_0001	10/25/2021	Title Search	SL 014 Unit 119 TITLE-CA8716216-PID-001-263-056		
LI0000060_0001	03/21/2022	Title Search	SL 015 Unit 101 TITLE-CA9761692-PID-001-263-064		
LI0000061_0001	10/25/2021	Title Search	SL 016 Unit 102 TITLE-CA1401080-PID-001-263-081		
LI0000062_0001	10/25/2021	Title Search	SL 017 Unit 103 TITLE-CA395591-PID-000-859-389		
LI0000063_0001	10/25/2021	Title Search	SL 018 Unit 104 TITLE-CA1984394-PID-000-799-979		
LI0000064_0001	10/25/2021	Title Search	SL 019 Unit 205 TITLE-BK324766-PID-001-263-099		
LI0000065_0001	10/25/2021	Title Search	SL 020 Unit 206 TITLE-CA6948253-PID-001-263-102		
LI0000066_0001	10/25/2021	Title Search	SL 021 Unit 207 TITLE-CA7817882-PID-001-263-111		
LI0000067_0001	01/11/2022	Title Search	SL 022 Unit 208 TITLE-CA9603740-PID-001-263-137		
LI0000068_0001	10/18/2023	Title Search	SL 023 Unit 209 TITLE-CA8007604-PID-001-263-145		
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LI0000070_0001	10/25/2021	Title Search	SL 025 Unit 211 TITLE-CA8716218-PID-001-263-161		
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LI0000074_0001	10/18/2023	Title Search	SL 029 Unit 216 TITLE-CA7467864-PID-001-263-200		
LI0000075_0001	10/12/2023	Title Search	SL 030 Unit 217 TITLE-CA7453019-PID-001-263-218		
LI0000076_0001	10/25/2021	Title Search	SL 031 Unit 218 TITLE-CA5140986-PID-001-263-226		
LI0000077_0001	10/25/2021	Title Search	SL 032 Unit 219 TITLE-BR284591-PID-001-263-234		
LI0000078_0001	10/25/2021	Title Search	SL 033 Unit 201 TITLE-BB694134-PID-001-263-242		
LI0000079_0001	10/25/2021	Title Search	SL 034 Unit 202 TITLE-CA8716221-PID-001-263-251		
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LI0000081_0001	10/18/2023	Title Search	SL 036 Unit 204 TITLE-CA8007614-PID-001-263-277		
LI0000082_0001	10/18/2023	Title Search	SL 037 Unit 305 TITLE-CA7467870-PID-001-263-285		
LI0000083_0001	10/25/2021	Title Search	SL 038 Unit 306 TITLE-CA321548-PID-001-263-293		
LI0000084_0001	10/25/2021	Title Search	SL 039 Unit 307 TITLE-CA8716222-PID-000-613-754		
LI0000085_0001	10/25/2021	Title Search	SL 040 Unit 308 TITLE-87140330-PID-001-025-953		
LI0000086_0001	10/25/2021	Title Search	SL 041 Unit 309 TITLE-CA8716223-PID-001-263-307		
LI0000087_0001	10/25/2021	Title Search	SL 042 Unit 310 TITLE-CA8716224-PID-001-263-315		
LI0000088_0001	10/25/2021	Title Search	SL 043 Unit 311 TITLE-CA8716225-PID-001-263-323		
LI0000089_0001	10/18/2023	Title Search	SL 044 Unit 312 TITLE-CA7467865-PID-001-263-340		
LI0000090_0001	10/25/2021	Title Search	SL 045 Unit 314 TITLE-CA8716226-PID-001-263-358		
LI0000091_0001	10/25/2021	Title Search	SL 046 Unit 315 TITLE-8B1459419-PID-001-263-366		
LI0000092_0001	10/18/2023	Title Search	SL 047 Unit 316 TITLE-CA7453020-PID-001-263-374		
LI0000093_0001	10/25/2021	Title Search	SL 048 Unit 317 TITLE-CA8716227-PID-001-263-382		

Schedule "A"

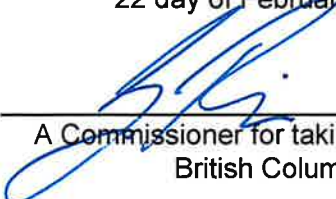
PROD_BEGDOC	Doc Date	Doc Type	Title	Author	Recipient
LI0000094.0001	01/04/2022	Title Search	SL 049 Unit 318 TITLE-BT65562-PID-001-263-391.1		
LI0000095.0001	05/31/2022	Title Search	SL 050 Unit 319 TITLE-AC120059-PID-000-564-885		
LI0000096.0001	10/12/2023	Title Search	SL 051 Unit 301 TITLE-CA7467869-PID-001-263-404		
LI0000097.0001	10/18/2023	Title Search	SL 052 Unit 302 TITLE-CA7603787-PID-001-263-421		
LI0000098.0001	10/25/2021	Title Search	SL 053 Unit 303 TITLE-CA8716228-PID-001-263-439		
LI0000099.0001	10/25/2021	Title Search	SL 054 Unit 304 TITLE-CA8716229-PID-001-263-447		
LI0000100.0001	10/12/2023	Title Search	SL 055 Unit 112 TITLE-CB231160-PID-001-263-455		
LI0000101.0001	10/25/2021	Title Search	SL 056 Unit 114 TITLE-BX477476-PID-000-814-377		
LI0000102.0001	10/12/2023	Title Search	SL 057 Unit 115 TITLE-CA7467862-PID-001-263-463		
LI0000103.0001	10/18/2023	Title Search	SL 058 Unit 116 TITLE-CA7467871-PID-001-263-480		
LI0000104.0001	04/14/2022	Title Search	SL 059 Unit 101 TITLE-CA3129128-PID-001-263-498		
LI0000105.0001	10/25/2021	Title Search	SL 060 Unit 102 TITLE-CA8716230-PID-001-263-528		
LI0000106.0001	10/25/2021	Title Search	SL 061 Unit 103 TITLE-CA8716231-PID-001-263-544		
LI0000107.0001	10/25/2021	Title Search	SL 062 Unit 104 TITLE-CA5366062-PID-001-263-561		
LI0000108.0001	10/25/2021	Title Search	SL 063 Unit 105 TITLE-BB4065793-PID-001-035-118		
LI0000109.0001	10/25/2021	Title Search	SL 064 Unit 106 TITLE-CA4604828-PID-001-263-579		
LI0000110.0001	10/26/2023	Title Search	SL 065 Unit 107 TITLE-CA3877190-PID-001-263-595		
LI0000111.0001	10/25/2021	Title Search	SL 066 Unit 108 TITLE-BV65548E-PID-001-263-609		
LI0000112.0001	10/18/2023	Title Search	SL 067 Unit 109 TITLE-CA7603776-PID-001-263-617		
LI0000113.0001	10/25/2021	Title Search	SL 068 Unit 110 TITLE-CA3760284-PID-001-263-625		
LI0000114.0001	10/12/2023	Title Search	SL 069 Unit 111 TITLE-CB231161-PID-001-263-633		
LI0000115.0001	10/12/2023	Title Search	SL 070 Unit 214 TITLE-WX2117885-PID-001-263-641		
LI0000116.0001	05/23/2023	Title Search	SL 071 Unit 215 TITLE-CA6935199-PID-001-263-650		
LI0000117.0001	10/25/2021	Title Search	SL 072 Unit 216 TITLE-BA16614-PID-001-263-676		
LI0000118.0001	10/25/2021	Title Search	SL 073 Unit 217 TITLE-CA8716232-PID-001-263-684		
LI0000119.0001	10/25/2021	Title Search	SL 074 Unit 201 TITLE-CA4121371-PID-001-263-706		
LI0000120.0001	10/18/2023	Title Search	SL 075 Unit 202 TITLE-CA7467873-PID-001-263-714		
LI0000121.0001	10/25/2021	Title Search	SL 076 Unit 203 TITLE-CA8716233-PID-001-263-731		
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LI0000123.0001	10/25/2021	Title Search	SL 078 Unit 205 TITLE-CA8716234-PID-001-263-757		
LI0000124.0001	10/25/2021	Title Search	SL 079 Unit 206 TITLE-BF186800-PID-000-473-774		
LI0000125.0001	10/25/2021	Title Search	SL 080 Unit 207 TITLE-BF160417-PID-001-263-765		
LI0000126.0001	10/25/2021	Title Search	SL 081 Unit 208 TITLE-AB56605-PID-001-263-773		
LI0000127.0001	10/25/2021	Title Search	SL 082 Unit 209 TITLE-CA8716235-PID-001-263-781		
LI0000128.0001	10/25/2021	Title Search	SL 083 Unit 210 TITLE-BN48265-PID-001-263-790		
LI0000129.0001	10/25/2021	Title Search	SL 084 Unit 211 TITLE-CA3766392-PID-001-263-811		
LI0000130.0001	10/25/2021	Title Search	SL 085 Unit 212 TITLE-CA2679484-PID-001-263-820		
LI0000131.0001	07/20/2023	Title Search	SL 086 Unit 314 TITLE-CA1118488-PID-001-263-838		
LI0000132.0001	10/25/2021	Title Search	SL 087 Unit 315 TITLE-CA8716236-PID-001-263-846		
LI0000133.0001	10/25/2021	Title Search	SL 088 Unit 316 TITLE-CA8716237-PID-001-263-854		
LI0000134.0001	10/25/2021	Title Search	SL 089 Unit 317 TITLE-CA8716238-PID-001-263-862		
LI0000135.0001	10/25/2021	Title Search	SL 090 Unit 301 TITLE-CA8716239-PID-001-263-871		
LI0000136.0001	10/25/2021	Title Search	SL 091 Unit 302 TITLE-CA8716240-PID-001-263-889		
LI0000137.0001	10/25/2021	Title Search	SL 092 Unit 303 TITLE-CA8716241-PID-001-263-897		
LI0000138.0001	02/14/2023	Title Search	SL 093 Unit 304 TITLE-CA4330711-PID-001-263-919		
LI0000139.0001	06/01/2023	Title Search	SL 094 Unit 305 TITLE-CA2071263-PID-001-263-927		
LI0000140.0001	10/25/2021	Title Search	SL 095 Unit 306 TITLE-BV393597-PID-001-263-935		
LI0000141.0001	10/25/2021	Title Search	SL 096 Unit 307 TITLE-CA3573261-PID-001-263-943		
LI0000142.0001	10/25/2021	Title Search	SL 097 Unit 308 TITLE-CA8716242-PID-001-263-951		
LI0000143.0001	10/25/2021	Title Search	SL 098 Unit 309 TITLE-CA963373-PID-001-263-960		
LI0000144.0001	04/05/2022	Title Search	SL 099 Unit 310 TITLE-CA9828047-PID-001-263-978		
LI0000145.0001	02/28/2022	Title Search	SL 100 Unit 311 TITLE-BV16632-PID-001-263-994		
LI0000146.0001	10/25/2021	Title Search	SL 101 Unit 312 TITLE-CA5053209-PID-001-264-001		

February 20, 2024

This is **Exhibit "L"** referred to in the affidavit  
of Alice Tsui made before me on this  
22 day of February, 2024.

**Via Email**

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

  
\_\_\_\_\_  
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**

We write further to our emails of February 8 and 16, 2024, to again request that The Owners, Strata Plan NW289 (the "**Strata Corporation**") put forward a representative for discovery for consideration by our client, 1038573 B.C. Ltd. ("**573**").

We also write, on review of the Strata Corporation's list of documents dated February 14, 2024, to request additional document discovery.

For clarity, the use of the term "document" in this letter is in reference to that term as it is broadly defined in Rule 1-1(1) of the *Supreme Court Civil Rules*. Unless otherwise noted, all capitalized terms are in reference to 573's notice of civil claim filed on December 18, 2023 ("**NCC**").

We request, further to both Rules 7-1(10) and 7-1(11), the listing and disclosure of the documents or categories of documents set out in the table below which are in the Strata Corporation's possession, power or control and which either (i) could be used by any party of record to prove or disprove a material fact (the Rule 7-1(10) disclosure standard), or (ii) relate to any matters in question in the action (the Rule 7-1(11) disclosure standard).

Documents or Categories of Documents	Relevant and Producible by Reason of These Allegations
1. All documents – including but not limited to correspondence between the Strata Corporation, the Strata Lot Owners, and others – relating to (i) the decision to sell the Property, (ii) the marketing and sale of the Property, (iii) any and all offers made in respect of the Property, or (iv) all steps	NCC, Part 1, paras. 4-6, 10 and 12.  Response to Civil Claim of the Strata Corporation filed December 22, 2023

Documents or Categories of Documents	Relevant and Producible by Reason of These Allegations
taken in furtherance of the sale of the Property.	("RTCC"), Part 1, paras. 5-6, 15 and 18-22.
2. All documents relating to the claim made in SCBC Vancouver Registry Action No. S-204200, which involves the Strata Corporation and the Property (the "Community Fire Claim").	NCC, Part 1, paras. 9-10. RTCC, Part 1, paras. 30-32.
3. All documents relating to written leases on any of the Property's strata lot units which (i) are in force, or (ii) were in force in the period since December 7, 2022.	NCC, Part 1, paras. 9-10. RTCC, Part 1, paras. 19-22 and 29.
4. All documents relating to the Property's strata lot units which are tenanted without having any written lease agreement.	NCC, Part 1, paras. 9-10. RTCC, Part 1, paras. 19-22 and 29.
5. The full conveyancing file in respect of the Property.	NCC, Part 1, paras. 4-10. RTCC, Part 1, paras. 6-10 and 12-18.
6. All documents relating to any sale of any strata unit that may have taken place since December 7, 2022, including all communications and conveyancing documents.	RTCC, Part 1, para. 15.  We note also comments made by Ms. Hannigan at the chambers hearing on January 31, 2024 that such sales have occurred, and the terms of the Purchase Contract which both (i) prohibit such sales (see e.g. s. 4.1(d)(iii)) and (ii) require disclosure to 573 of any such sales (see s. 4.2(p)).
7. The Strata Corporation's bylaws, as well as any Strata Corporation meeting minutes which relate to the sale of the Property or the Community Fire Claim.	NCC, Part 1, paras. 2-6 and 9-10.  RTCC, Part 1, paras. 4-10, 15, 18, 21 and 31-32.
8. All documents relating to tax arrears on any of the strata units in the period December	NCC, Part 1, paras. 9-10.



Documents or Categories of Documents	Relevant and Producing by Reason of These Allegations
2022 to present – including but not limited to communications between any of the Strata Lot Owners, the Strata Corporation and the City of Burnaby.	RTCC, Part 1, para. 18.

We look forward to the receipt of the Strata Corporation's supplemental list of documents and associated production. In the event that disclosure of the documents set out above is not forthcoming, we anticipate receiving instructions to apply for a court order compelling same.

Finally, we write to request a listing of any documents over which the Strata Corporation may claim privilege, in accordance with the Court of Appeal's decision in *Stone v. Ellerman*. To be clear, it is our client's position that no claims of privilege properly arise in respect of any of the documents requested above.

We look forward to hearing from you.

Yours truly,

**Dennis James Aitken LLP**



**Craig P. Dennis, K.C.**

Direct: 604-659-9480

cdennis@djacounsel.com

CPD/sc

This is **Exhibit "M"** referred to in the affidavit  
of Alice Tsui made before me on this  
22 day of February, 2024.

February 20, 2024

***Via Email***

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

  
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**

Please find enclosed for service upon The Owners, Strata Plan NW289 a notice of appointment in respect of a discovery of Derek Lai, scheduled for February 28, 2024 at 10:00 a.m.

Please advise if conduct money is required, and it will be provided.

Yours truly,

**Dennis James Aitken LLP**

  
**Ray Power**  
Direct: 604-659-9454  
rpower@djacounsel.com

RLP/at  
Encl.

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

TO: Derek Lai, as representative of The Owners, Strata Plan NW289

AND TO: His Counsel

TAKE NOTICE that you are required to attend for your examination for discovery at the place, date and time set out below. If you are not a named party, or a representative of a named party, to this action, you must, unless the court otherwise orders, bring with you all documents in your possession or control, not privileged, relating to the matters in question in this action. Please note the provisions of the *Supreme Court Civil Rules* reproduced below.


PLACE: Charest Reporting Inc.  
885 W Georgia St 5<sup>th</sup> floor,  
Vancouver, BC V6C 0B5  
**Via Videoconference (link to follow)**

DATE: 28/FEB/2024  
TIME: 10:00 a.m. (full day day)

Dated: February 20, 2024

*Implied undertaking to the court*

*Documents produced are not to be used by the other party(ies) except for the purposes of this litigation unless and until the scope of the undertaking is varied by a court order or other judicial order, consent or statutory override or a situation of immediate and serious danger emerges. This implied undertaking continues despite settlement or completion of this litigation.*

  
\_\_\_\_\_  
Signature of lawyer for parties wishing to  
conduct examination  
Craig P. Dennis, K. C.

COPY TO: Charest - [Scheduling2@charestlegalsolutions.com](mailto:Scheduling2@charestlegalsolutions.com)

Rules 22-7(5) and 22-8 (4) of the *Supreme Court Civil Rules* state in part:

- "22-7 (5) ...if a person, contrary to these Supreme Court Civil Rules and without lawful excuse,
- (a) refuses or neglects to obey a subpoena or to attend at the time and place appointed for his or her examination for discovery, ...
- then
- (f) if the person is the plaintiff or petitioner, a present officer of a corporate plaintiff or petitioner or a partner in or manager of a partnership plaintiff or petitioner, the court may dismiss the proceeding, and
  - (g) if the person is a defendant, respondent or third party, a present officer of a corporate defendant, respondent or third party or a partner in or manager of a partnership defendant, respondent or third party, the court may order the proceeding to continue as if no response to civil claim had been filed.

22-8 (4) A person who is guilty of an act or omission described in Rule 12-5 (25) or 22-7 (5), in addition to being subject to any consequences prescribed by those rules, is guilty of contempt of court and subject to the court's power to punish contempt of court."

February 21, 2024

This is **Exhibit "N"** referred to in the affidavit  
of Alice Tsui made before me on this  
22 day of February, 2024.

**Via Email**

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

  
\_\_\_\_\_  
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**

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Please find enclosed the plaintiff's Notice to Admit dated February 21, 2024.

Yours truly,

**Dennis James Aitken LLP**

  
**Ray Power**  
Direct: 604-659-9454  
rpower@djacounsel.com  
RLP/at

Encl.

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


**NOTICE TO ADMIT**

To: the defendant, The Owners, Strata Plan NW289 (the "**Strata Corporation**")

TAKE NOTICE that the plaintiff and defendant by way of counterclaim, 1038573 B.C. Ltd. ("**573**"), requests that the Strata Corporation admit, for the purpose of this proceeding only, the facts set out below and the authenticity of the documents referred to below, copies of which are attached.

AND TAKE NOTICE that, unless the court otherwise orders, if the party to whom the notice is directed does not serve a written statement, as provided in Rule 7-7(2) of the *Supreme Court Civil Rules*, within 14 days after service of a copy of this notice on him or her, then the truth of the facts and the authenticity of the documents will be deemed to be admitted.

Date: February 21, 2024

  
 Signature of lawyer for party serving notice  
 to admit, 1038573 B.C. Ltd.  
 Craig P. Dennis, K.C. / Ray Power

The facts, the admission of which is requested, are:

**Tenancies at Property**

1. The Owners, Strata Plan NW289 (the "**Strata Corporation**") entered into a Purchase and Sale Agreement dated December 7, 2022 (the "**Purchase Contract**") to sell all of the lands and premises within Strata Plan NW289, municipally located at 3925 Kingsway and 5715 Jersey Avenue, Burnaby, together with all improvements thereon and rights and benefits appurtenant thereto (together, the "**Property**") to 1038573 B.C. Ltd. ("**573**").
2. The Strata Corporation entered into the Purchase Contract on its own behalf and on behalf of the registered owners of strata lots 1 through 101 of the Strata Corporation (the "**Strata Lot Owners**").
3. Prior to December 7, 2022, the Strata Corporation disclosed to 573 that 29 of the strata lots were leased.
4. As of October 2023, there were strata lots other than the 29 originally disclosed which were tenanted.
5. As of today, there are strata lots other than the 29 originally disclosed which are tenanted.
6. The Strata Corporation has not disclosed to 573 the number of these additional tenancies.



7. The Strata Corporation has not disclosed to 573 the strata lots which are subject to these additional tenancies.
8. The Strata Corporation has not disclosed to 573 the terms of these additional tenancies.
9. Some of these additional tenancies are subject to a written lease agreement.
10. The Strata Corporation has not disclosed to 573 the terms of any such written lease agreement.
11. Some of these additional tenancies are subject to an oral lease agreement.
12. The Strata Corporation has not disclosed to 573 the terms of any such oral lease agreement.

#### Sales by Strata Lot Owners

13. Since December 7, 2022, some of the Strata Lot Owners have transferred either the legal or beneficial interest in their units, or both.
14. Since December 7, 2022, some of the Strata Lot Owners have entered into option agreements whereby they have granted an option to purchase their unit.
15. The Strata Corporation has not provided 573 with notice of these sales or potential sales.
16. The Strata Corporation has not provided 573 with details or the terms of these sales or potential sales.

#### Foreclosure Proceedings

17. Some of the strata lots at the Property are subject to foreclosure proceedings.
18. The Strata Corporation has not provided 573 with details concerning these foreclosure proceedings.

#### Community Fire Claim

19. On April 17, 2020, Community Fire Prevention Ltd. filed a claim against the Strata Corporation, Strata Corporation council members, the Strata Lot Owners, and others in SCBC Vancouver Registry Action No. S204200 (the "**Community Fire Claim**").
20. The relief sought in the Community Fire Claim includes a certificate of pending litigation.
21. The relief sought in the Community Fire Claim includes general damages and special damages.

22. The relief sought in the Community Fire Claim includes an order that strata units be sold for the purposes of realizing any judgment.
23. The relief sought in the Community Fire Claim includes legal costs.
24. The relief sought in the Community Fire Claim includes “such further and other relief as the nature of this case may require and this Honourable Court may deem proper”.
25. Trial of the Community Fire Claim is scheduled for 10 days, beginning April 14, 2025.

The documents, the authenticity of which admission is requested, are:

1. Each of the documents set out in Schedule A.

**SCHEDULE "A"**


<b>TAB</b>	<b>DOCUMENT</b>
1.	Letter from Peter Roberts, K.C. of Lawson Lundell LLP to Craig Dennis, K.C. dated December 12, 2023.
2.	Letter from Peter Roberts, K.C. to Jennifer Williams dated December 18, 2023.
3.	Letter from Peter Roberts, K.C. to Craig Dennis, K.C. dated December 19, 2023.
4.	Notice of Civil Claim filed April 17, 2020 in SCBC Vancouver Registry Action No. S2024200.
5.	Response to Civil Claim filed May 20, 2020 by The Owners, Strata Plan NW289 in SCBC Vancouver Registry Action No. S204200.
6.	Notice of Trial filed December 11, 2023 in SCBC Vancouver Registry Action No. S204200.

February 21, 2024

***Via Email***

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

This is **Exhibit "O"** referred to in the affidavit  
of Alice Tsui made before me on this  
22 day of February, 2024.



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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**

---

Please find enclosed the plaintiff's List of Documents dated February 21, 2024.

Yours truly,

**Dennis James Aitken LLP**



Ray Power  
Direct: 604-659-9454  
rpower@djacounsel.com  
RLP/at

Encl.

NO. S230272  
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 FACCIO, 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

**LIST OF DOCUMENTS**

This list is delivered on behalf of: The Plaintiff, 1038573 B.C. LTD

**Part 1: DOCUMENTS THAT ARE OR HAVE BEEN IN THE LISTING PARTY'S POSSESSION OR CONTROL AND THAT COULD BE USED BY ANY PARTY AT TRIAL TO PROVE OR DISPROVE A MATERIAL FACT**

- 2 -

No.	Date of document	Description of document	Indicate by a check mark if the document is no longer in the listing party's possession or control	Indicate, for each document listed in this Part by way of an amendment to this List of Documents under Rule 7-1 (9), (12) or (14), the date on which the document was listed
1.1	2024 02 21	See Schedule "A" attached to the List of Documents	<input type="checkbox"/>	

**Part 2: OTHER DOCUMENTS TO WHICH THE LISTING PARTY INTENDS TO REFER AT TRIAL**

No.	Date of document	Description of document	Indicate by a check mark if the document is no longer in the listing party's possession or control	Indicate, for each document listed in this Part by way of an amendment to this List of Documents under Rule 7-1 (9), (12) or (14), the date on which the document was listed
2.1			<input type="checkbox"/>	

**Part 3: DOCUMENTS THAT RELATE TO A MATTER IN QUESTION IN THE ACTION**

No.	Date of document	Description of document	Indicate by a check mark if the document is no longer in the listing party's possession or control	Indicate, for each document listed in this Part by way of an amendment to this List of Documents under Rule 7-1 (9), (12) or (14), the date on which the document was listed
3.1			<input type="checkbox"/>	

**Part 4: DOCUMENTS FOR WHICH PRIVILEGE FROM PRODUCTION IS CLAIMED**

No.	Date of document	Description of document	Grounds on which privilege is claimed	Indicate, for each document listed in this Part by way of an amendment to this List of Documents under Rule 7-1 (9), (12) or (14), the date on which the document was listed
4.1				

The grounds for claiming privilege for the documents are as follows:

A. The documents consist of professional communications of a confidential nature which passed between the plaintiff and its solicitors, or between the plaintiff's solicitors, for the purpose of the plaintiff obtaining legal advice and assistance, and memoranda or notes or other records made by the plaintiff of, or for the purpose of, such communications or of discussions with the plaintiff of such communications.

B. The documents consist of communications which passed between the plaintiff's solicitors and third persons, or documents obtained by the plaintiff's solicitors from third persons, for the dominant purpose of litigation or anticipated litigation so as to enable the plaintiff's solicitors to conduct or aid in the conduct of, or to provide the plaintiff with legal advice and assistance with respect to such litigation or anticipated litigation.

C. The documents consist of communications which passed between the plaintiff's and third persons, or documents obtained by the plaintiff from third persons, for the dominant purpose of litigation or anticipated litigation so as to obtain information or advice to be submitted to the plaintiff's solicitors to enable the plaintiff's solicitors to conduct or aid in the conduct of, or to provide the plaintiff with legal advice and assistance with respect to, such litigation or anticipated litigation, and memoranda or notes or other records made by the plaintiff of such communications or of discussions with the plaintiff of such communications.

D. The documents consist of communications which passed among the plaintiff or third persons, or their respective solicitors acting in their professional capacity, being persons having a common interest in, and for the dominant purpose of litigation or anticipated litigation, including the provision of legal advice and assistance with respect to such litigation or anticipated litigation, and memoranda or notes or other records made of such communications or of discussions of such communications.

E. The documents consist of without prejudice communications written for the purpose of, and passing in the course of, bona fide negotiations between the plaintiff, defendants and/or their respective solicitors.

- 4 -

TAKE NOTICE that the documents listed in Parts 1, 2 and 3 of this List of Documents that are not shown as no longer being in the listing party's possession or control may be inspected and copied, during normal business hours, at Dennis James Aitken LLP, 800 - 543 Granville Street, Vancouver, BC V6C 1X8.

Dated: February 21, 2024

*Implied undertaking to the court*

*Documents produced are not to be used by the other party(ies) except for the purposes of this litigation unless and until the scope of the undertaking is varied by a court order or other judicial order, consent or statutory override or a situation of immediate and serious danger emerges. This implied undertaking continues despite settlement or completion of the litigation.*



---

Signature of Craig Dennis, K.C. /  
Ray Power  
Lawyers for listing party

This List of Documents is delivered by Dennis James Aitken LLP, solicitors for the Plaintiff, whose place of business and address for service is 800 - 543 Granville Street, Vancouver, BC V6C 1X8. Email: [cdennis@djacounsel.com](mailto:cdennis@djacounsel.com) / [rpower@djacounsel.com](mailto:rpower@djacounsel.com), Tel: 604-659-9479



Schedule "A"

BegBates	#Pgs	DocType	DocDate	Filename	From	To	Grounds for Privilege	Part #	ListDate
PLA00001.00001	22	PDF	2020-04-17	Notice of Civil Claim.pdf				1	21-Feb-24
PLA00002.00001	4	PDF	2020-05-20	Response to Civil Claim.pdf				1	21-Feb-24
PLA00003.00001	5	PDF	2020-07-22	Response to Civil Claim.pdf				1	21-Feb-24
PLA00004.00001	141	PDF	2020-09-14	2009-0684_Report.pdf				1	21-Feb-24
PLA00005.00001	1	Email	2020-11-07	FW_Camery Gardens.msg		brnxton_dev@gmail.com>		1	21-Feb-24
PLA00006.00001	1	PDF	2020-11-07	Camery_Gardens.pdf		brnxton_dev@gmail.com	Solicitor-Client Privilege	1	21-Feb-24
PLA00007.00001	3	Email	2021-05-07	FW_3925_Kingsway_5725_Jersey_Ave_Density_enquiry.msg		David Grewal_grewal@shawbiz.ca>		1	21-Feb-24
PLA00008.00001	4	PDF	2020-07-21	3925_KINGSWAY_-_Density_-_2020-07-20.pdf				1	21-Feb-24
PLA00009.00001	5	PDF	2021-05-31	Case Plan Order.pdf				1	21-Feb-24
PLA00010.00001	26	PDF	2021-08-17	Order Made after Application.pdf				1	21-Feb-24
PLA00011.00001	34	PDF	2022-09-20	[EXECUTED] Contract of Purchase and Sale.pdf				1	21-Feb-24
PLA00012.00001	1	Spreadsh	2022-10-31	Rent Roll - Oct 2022 - Jersey.xlsx				1	21-Feb-24
PLA00013.00001	2	Email	2022-11-28	Re Confirming most recent PSA version re Camery Gardens.eml	Jennifer Williams <jwilliams@harpergrey.com>	Ed Wilson <ewilson@lawsonlundell.com>		1	21-Feb-24
PLA00014.00001	3	Email	2022-11-29	FW_Confirming most recent PSA version re Camery Gardens(2).eml	Jennifer Williams <jwilliams@harpergrey.com>	Margaret Kwan <mkwan@harpergrey.com>		1	21-Feb-24
PLA00015.00001	1	Email	2022-12-08	Camery Gardens - Signed Offer to Purchase.eml	Jennifer Williams <jwilliams@harpergrey.com>	Ed Wilson <ewilson@lawsonlundell.com>		1	21-Feb-24
PLA00016.00001	2	PDF	2022-12-08	camery_agreement.pdf				1	21-Feb-24
PLA00017.00001	33	PDF	2022-12-08	camery_revised.pdf				1	21-Feb-24
PLA00018.00001	33	Document	2022-12-08	[EXECUTION COPY] 1038573_B.C._LTD_-_Purchase_and_Sale_Agreement.doc				1	21-Feb-24
PLA00019.00001	2	Email	2022-12-09	RE_Camery Gardens - Signed Offer to Purchase(3).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>		1	21-Feb-24
PLA00020.00001	2	Email	2022-12-09	FW_Camery Gardens - Signed Offer to Purchase(2).eml	Jennifer Williams <jwilliams@harpergrey.com>	Margaret Kwan <mkwan@harpergrey.com>		1	21-Feb-24
PLA00021.00001	2	Email	2022-12-09	RE_Camery Gardens - Signed Offer to Purchase(2).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>		1	21-Feb-24
PLA00022.00001	33	PDF	2022-12-09	Purchase_and_Sale_Agreement_with_1038573_BC_Ltd._(fully_executed).pdf				1	21-Feb-24
PLA00023.00001	3	Email	2022-12-09	RE_Camery Gardens - Signed Offer to Purchase.eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>		1	21-Feb-24
PLA00024.00001	3	Email	2023-01-06	Fwd_Camery Gardens - Signed Offer to Purchase.eml	Jennifer Williams <jwilliams@harpergrey.com>	Margaret Kwan <mkwan@harpergrey.com>		1	21-Feb-24
PLA00025.00001	33	PDF	2022-12-09	Purchase_and_Sale_Agreement_with_1038573_BC_Ltd._(fully_executed).pdf				1	21-Feb-24
PLA00026.00001	3	Email	2023-01-10	FW_Due Diligence Documents(4).eml	Jennifer Williams <jwilliams@harpergrey.com>	Joanne Kwan <jkwan@harpergrey.com>		1	21-Feb-24
PLA00027.00001	1	Spreadsh	2013-01-29	5715_Jersey_Avenue_Oct_2022_rent_roll.xlsx				1	21-Feb-24
PLA00028.00001	1	Spreadsh	2013-01-29	3925_Kingsway_Oct_2022_rent_roll.xlsx				1	21-Feb-24
PLA00029.00001	3	Email	2022-01-10	FW_Due Diligence Documents(3).eml	Jennifer Williams <jwilliams@harpergrey.com>	Joanne Kwan <jkwan@harpergrey.com>		1	21-Feb-24
PLA00030.00001	16	PDF	2022-01-19	Camery Gardens Strata Plan NW 289 - Strata Management Contract - Executed.pdf				1	21-Feb-24
PLA00031.00001	63	PDF	2014-07-08	NW 289 Depreciation Report_FINAL_2014.pdf				1	21-Feb-24
PLA00032.00001	6	PDF	2021-11-15	Mundies Towing-Form.pdf				1	21-Feb-24
PLA00033.00001	6	PDF	2021-11-02	501 - Coinmatic Laundry Contract - October 29, 2021 - Kingsway & Jersey.pdf				1	21-Feb-24
PLA00034.00001	10	PDF	2022-04-02	Rental Management Agreement - FPR -Unit 108 - NW 289 - Camery Gardens July 1, 2021.pdf				1	21-Feb-24
PLA00035.00001	1	PDF	2021-05-26	501 - Approved Contract - Camery Gardens May 26, 2021.pdf				1	21-Feb-24
PLA00036.00001	3	PDF	2021-12-03	Snow Pro Snow Removal Contract.pdf				1	21-Feb-24
PLA00037.00001	13	PDF	2022-09-07	Preventative Maintenance-Kerns .pdf				1	21-Feb-24
PLA00038.00001	1	Spreadsh	2021-09-28	Owner-Tenant Information-Sep 2022.xlsx				1	21-Feb-24
PLA00039.00001	1	Email	2023-01-24	Camery Gardens(4).eml	Ed Wilson <ewilson@lawsonlundell.com>	"jwilliams@harpergrey.com" <jwilliams@harpergrey.com>		1	21-Feb-24
PLA00040.00001	1	Email	2023-01-24	RE_Camery Gardens(28).eml	Jennifer Williams <jwilliams@harpergrey.com>	Ed Wilson <ewilson@lawsonlundell.com>		1	21-Feb-24
PLA00041.00001	4	Email	2023-01-25	FW_Due Diligence Documents.eml	Jennifer Williams <jwilliams@harpergrey.com>	Margaret Kwan <mkwan@harpergrey.com>		1	21-Feb-24
PLA00042.00001	1	Email	2023-01-25	RE_Camery Gardens(27).eml	Ed Wilson <ewilson@lawsonlundell.com>	"jwilliams@harpergrey.com" <jwilliams@harpergrey.com>		1	21-Feb-24
PLA00043.00001	2	Email	2023-01-25	RE_Camery Gardens(26).eml	Jennifer Williams <jwilliams@harpergrey.com>	Ed Wilson <ewilson@lawsonlundell.com>		1	21-Feb-24
PLA00044.00001	2	Email	2023-01-25	RE_Camery Gardens(25).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>		1	21-Feb-24
PLA00045.00001	1	Email	2023-01-26	FW_Partial Subject removal.eml	REDACTED	REDACTED	Solicitor-Client Privilege	1	21-Feb-24
PLA00046.00001	2	PDF	2023-01-26	[SIGNED_-_Purchaser] Subject Removal_and_Extension_-_January_26_2023.pdf				1	21-Feb-24
PLA00047.00001	2	Email	2023-01-26	RE_Camery Gardens(23).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>		1	21-Feb-24
PLA00048.00001	3	Email	2023-01-26	Fwd_Camery Gardens.eml	Jennifer Williams <jwilliams@harpergrey.com>	Margaret Kwan <mkwan@harpergrey.com>		1	21-Feb-24
PLA00049.00001	3	Email	2023-01-26	RE_Camery Gardens(22).eml	Jennifer Williams <jwilliams@harpergrey.com>	Margaret Kwan <mkwan@harpergrey.com>		1	21-Feb-24
PLA00050.00001	1	Email	2023-01-26	Partial Subject removal.eml	Jennifer Williams <jwilliams@harpergrey.com>	Ed Wilson <ewilson@lawsonlundell.com>		1	21-Feb-24
PLA00051.00001	1	PDF	2023-01-26	[SIGNED_-_Purchaser] Subject Removal_and_Extension_-_January_26_2023.pdf				1	21-Feb-24
PLA00052.00001	2	Email	2023-01-26	Camery Gardens Partial Subject removal.eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>		1	21-Feb-24
PLA00053.00001	2	Email	2023-01-26	RE_Camery Gardens Partial Subject removal(39).eml	Jennifer Williams <jwilliams@harpergrey.com>	Ed Wilson <ewilson@lawsonlundell.com>		1	21-Feb-24
PLA00054.00001	2	Email	2023-01-27	RE_Camery Gardens Partial Subject removal(36).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>		1	21-Feb-24

PLA00055.00001	1	Document	2023-01-27	Cameray Gardens - Purchaser Subject Removal and Extension (Draft_01.27.23).DOCX					1	21-Feb-24
PLA00056.00001	1	PDF	2023-01-27	Cameray Gardens - Purchaser Subject Removal and Extension (signed by Liquidator).pdf	Jennifer Williams <jwilliams@harpergrey.com>	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>		1	21-Feb-24
PLA00057.00001	2	Email	2023-01-27	RE Cameray Gardens Partial Subject removal(35).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00058.00001	3	Email	2023-01-27	RE Cameray Gardens Partial Subject removal(34).eml	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00059.00001	1	Document	2023-01-27	Cameray Gardens - Purchaser Subject Removal and Extension (Draft_01.27.23).DOCX					1	21-Feb-24
PLA00060.00001	3	Email	2023-01-27	RE Cameray Gardens Partial Subject removal(33).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00061.00001	1	PDF	2023-01-27	Cameray Gardens - Purchaser Subject Removal and Extension (Draft_01.27.23)_ (final) (signed by Liquidator).pdf	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00062.00001	3	Email	2023-01-27	RE Cameray Gardens Partial Subject removal(31).eml	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00063.00001	3	Email	2023-01-27	RE Cameray Gardens Partial Subject removal(30).eml	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00064.00001	1	PDF	2023-01-27	[FULLY_EXECUTED] Purchaser Partial Subject Removal and Extension (January_27_2023).pdf	Margaret Kwan <mkwan@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00065.00001	4	Email	2023-01-27	Re Cameray Gardens Partial Subject removal(29).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00066.00001	4	Email	2023-01-27	Re Cameray Gardens Partial Subject removal(28).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00067.00001	3	Email	2023-02-08	RE Cameray Gardens Partial Subject removal(27).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00068.00001	4	Email	2023-02-13	RE Cameray Gardens Partial Subject removal(26).eml	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00069.00001	5	Email	2023-02-24	FW Cameray Gardens Partial Subject removal(5).eml	REDACTED	REDACTED	Solicitor-Client Privilege 1		1	21-Feb-24
PLA00070.00001	5	Email	2023-02-24	Re Cameray Gardens Partial Subject removal(25).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00071.00001	4	Email	2023-02-24	RE Cameray Gardens Partial Subject removal(24).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00072.00001	4	Email	2023-02-24	RE Cameray Gardens Partial Subject removal(23).eml	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00073.00001	5	Email	2023-02-24	RE Cameray Gardens Partial Subject removal(22).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00074.00001	5	Email	2023-02-24	RE Cameray Gardens Partial Subject removal(21).eml	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00075.00001	5	Email	2023-02-24	RE Cameray Gardens Partial Subject removal(20).eml	Margaret Kwan <mkwan@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00076.00001	2	PDF	2023-02-24	[PURCHASER_EXECUTED] Subject Removal and Extension (February_24_2023).pdf	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00077.00001	6	Email	2023-02-24	RE Cameray Gardens Partial Subject removal(19).eml	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00078.00001	6	Email	2023-02-24	RE Cameray Gardens Partial Subject removal(18).eml	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00079.00001	6	Email	2023-02-24	RE Cameray Gardens Partial Subject removal(17).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00080.00001	6	PDF	2023-02-24	Subject Removal and Extension (February_24_2023) (fully_execute).pdf					1	21-Feb-24
PLA00081.00001	6	PDF	2023-02-24	RE Cameray Gardens Partial Subject removal(16).eml	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00082.00001	7	Email	2023-02-24	RE Cameray Gardens Partial Subject removal(15).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00083.00001	7	Email	2023-02-24	RE Cameray Gardens Partial Subject removal(14).eml	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00084.00001	7	Email	2023-02-24	RE Cameray Gardens Partial Subject removal(13).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00085.00001	7	Email	2023-02-28	RE Cameray Gardens Partial Subject removal(6).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00086.00001	8	Email	2023-02-28	RE Cameray Gardens Partial Subject removal.eml	Joanne Kwan <jkwan@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00087.00001	1	PDF	2023-02-28	Letter to Lawson Lundell LLP - Receipt of Deposit.pdf					1	21-Feb-24
PLA00088.00001	1	Email	2023-04-12	3925 Kingsway & 5715 Jersey Ave., Burnaby eml	Agnes Au <aa@naicommercial.ca>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00089.00001	2	PDF	2023-04-12	3001_001.pdf	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00090.00001	1	Email	2023-04-12	FW_3925 Kingsway & 5715 Jersey Ave., Burnaby(2).eml	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00091.00001	2	PDF	2023-04-12	3001_001.pdf	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00092.00001	2	Email	2023-04-12	FW_3925 Kingsway & 5715 Jersey Ave., Burnaby eml	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00093.00001	2	PDF	2023-04-12	3001_001.pdf	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00094.00001	2	PDF	2023-04-19	Cameray Gardens(3).eml	Ed Wilson <ewilson@lawsonlundell.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00095.00001	8	PDF	2022-06-17	012_Order_of_Justice_Milman_June_17_2022.PDF					1	21-Feb-24
PLA00096.00001	4	Document	2023-04-19	Cameray Gardens - Second Amendment to PSA.DOCX					1	21-Feb-24
PLA00097.00001	1	Email	2023-04-19	Voice Message from Lawson Lundell (16046653456) on 4-19-23 1 10 PM to eml	VM2Text@telus.com	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00098.00001	1	Audio	041923-131017-jwilliams-1681938617000-1.wav						1	21-Feb-24
PLA00099.00001	4	Document	2023-04-19	Cameray Gardens - Second Amendment to PSA.DOCX					1	21-Feb-24
PLA00100.00001	8	PDF	2023-04-19	012_Order_of_Justice_Milman_June_17_2022.PDF					1	21-Feb-24
PLA00101.00001	1	Email	2023-04-19	Voice Message from Lawson Lundell (16046653456) on 4-19-23 2 31 PM to eml	VM2Text@telus.com	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00102.00001	1	Audio	041923-143708-jwilliams-1681943468000-1.wav						1	21-Feb-24
PLA00103.00001	2	Email	2023-04-19	FW Cameray Gardens(6).eml	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00104.00001	2	Email	2023-04-19	RE Cameray Gardens(17).eml	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00105.00001	1	Email	2023-04-20	Cameray Gardens - breach eml	Hamish Gray <hgray@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00106.00001	2	PDF	2023-04-20	[SIGNED] Letter to Lawson Lundell LLP - Breach.pdf					1	21-Feb-24
PLA00107.00001	2	Email	2023-05-16	Voice Message from Lawson Lundell (16046653456) on 5-16-23 9 03 AM to eml	VM2Text@telus.com	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24
PLA00108.00001	1	Audio	051623-090308-jwilliams-1684256858000-1.wav						1	21-Feb-24
PLA00109.00001	2	Email	2023-05-16	FW Voice Message from Lawson Lundell (16046653456) on 5-16-23 9 03 A eml	Jennifer Williams <jwilliams@harpergrey.com>	Jennifer Williams <jwilliams@harpergrey.com>			1	21-Feb-24

PLA00110.00001	1	Audio	051623-090308-williams-1684256588000-1.wav		Ed Wilson <ewilson@lawsonlundell.com> REDACTED	Jennifer Williams <jwilliams@harpergrey.com> REDACTED	1	21-Feb-24
PLA00111.00001	1	Email	2023-05-20 Cameray Gardens - eml	2023-05-20	REDACTED	Jennifer Williams <jwilliams@harpergrey.com> REDACTED	1	21-Feb-24
PLA00112.00001	2	Email	RE: Cameray Gardens - Draft Subject Waiver(5).eml	2023-05-23	RE: Cameray Gardens - Second Condition Waiver_(Draft_05.23.2023).DOCX	Solicitor-Client Privilege 1	1	21-Feb-24
PLA00113.00001	1	Document	Cameray Gardens - Second Condition Waiver_(Draft_05.23.2023).DOCX	2023-05-23			1	21-Feb-24
PLA00114.00001	2	Email	RE: Cameray Gardens - Draft Subject Waiver(17).eml	2023-05-23	RE: Cameray Gardens - Second Condition Waiver_(Draft_05.23.2023).DOCX		1	21-Feb-24
PLA00115.00001	1	Document	Cameray Gardens - Second Condition Waiver_(Draft_05.23.2023).DOCX	2023-05-23			1	21-Feb-24
PLA00116.00001	2	Email	RE: Cameray Gardens - Draft Subject Waiver(16).eml	2023-05-24	RE: Cameray Gardens - Draft Subject Waiver(15).eml		1	21-Feb-24
PLA00117.00001	2	Email	RE: Cameray Gardens - Draft Subject Waiver(15).eml	2023-05-24	RE: Cameray Gardens - Draft Subject Waiver(14).eml		1	21-Feb-24
PLA00118.00001	3	Email	RE: Cameray Gardens - Draft Subject Waiver(14).eml	2023-05-24	RE: Cameray Gardens - Draft Subject Waiver(13).eml		1	21-Feb-24
PLA00119.00001	3	Email	RE: Cameray Gardens - Draft Subject Waiver(13).eml	2023-05-24	RE: Cameray Gardens - Draft Subject Waiver(12).eml		1	21-Feb-24
PLA00120.00001	3	Email	RE: Cameray Gardens - Draft Subject Waiver(12).eml	2023-05-24	RE: Cameray Gardens - Draft Subject Waiver(11).eml		1	21-Feb-24
PLA00121.00001	3	Email	RE: Cameray Gardens - Draft Subject Waiver(11).eml	2023-05-24	Cameray Gardens - May_20_2023_-_SGM_Meeting_Minutes_(Draft_LL_05.24.2023).DOCX		1	21-Feb-24
PLA00122.00001	2	Document	Cameray Gardens - May_20_2023_-_SGM_Meeting_Minutes_(Draft_LL_05.24.2023).DOCX	2023-05-24			1	21-Feb-24
PLA00123.00001	1	Document	Cameray Gardens - Second Condition Waiver_(Draft_05.24.2023).DOCX	2023-05-24			1	21-Feb-24
PLA00124.00001	3	PDF	2023-05-24 Redline - Cameray Gardens - Second Condition Waiver_(Draft_05.23.2023)-23239352-v1_and_Cameray_Gardens_-_Second_Condition_Waiver_(Draft_05.24.2023)-23239352-v2.pdf	2023-05-24	Redline - Cameray Gardens - Second Condition Waiver_(Draft_05.23.2023)-23239352-v1_and_Cameray_Gardens_-_Second_Condition_Waiver_(Draft_05.24.2023).DOCX		1	21-Feb-24
PLA00125.00001	4	PDF	2023-05-24 RE: Cameray Gardens - Draft Subject Waiver(10).eml	2023-05-24	RE: Cameray Gardens - Draft Subject Waiver(9).eml		1	21-Feb-24
PLA00126.00001	4	Email	RE: Cameray Gardens - Draft Subject Waiver(9).eml	2023-05-24	RE: Cameray Gardens - Draft Subject Waiver(8).eml		1	21-Feb-24
PLA00127.00001	1	PDF	2023-05-24 Second Condition Waiver_(05.24.2023).pdf	2023-05-24			1	21-Feb-24
PLA00128.00001	3	Email	RE: Cameray Gardens - Draft Subject Waiver(8).eml	2023-05-24	RE: Cameray Gardens - Draft Subject Waiver(7).eml		1	21-Feb-24
PLA00129.00001	4	Email	RE: Cameray Gardens - Draft Subject Waiver(7).eml	2023-05-24	RE: Cameray Gardens - Draft Subject Waiver(6).eml		1	21-Feb-24
PLA00130.00001	4	Email	RE: Cameray Gardens - Draft Subject Waiver(6).eml	2023-05-25	RE: Cameray Gardens - Draft Subject Waiver(5).eml		1	21-Feb-24
PLA00131.00001	1	PDF	2023-05-25 Second Condition Waiver_(05.24.2023).pdf	2023-05-25			1	21-Feb-24
PLA00132.00001	4	Email	RE: Cameray Gardens - Draft Subject Waiver(5).eml	2023-05-25	RE: Cameray Gardens - Draft Subject Waiver(4).eml		1	21-Feb-24
PLA00133.00001	5	Email	RE: Cameray Gardens - Draft Subject Waiver(4).eml	2023-05-25	RE: Cameray Gardens - Draft Subject Waiver(3).eml		1	21-Feb-24
PLA00134.00001	4	Email	RE: Cameray Gardens - Draft Subject Waiver(3).eml	2023-05-25	RE: Cameray Gardens - Draft Subject Waiver(2).eml		1	21-Feb-24
PLA00135.00001	2	PDF	2023-05-25 Mutual Notice of Second Condition Satisfaction_and_of Waiver_(signed).pdf	2023-05-25			1	21-Feb-24
PLA00136.00001	2	Email	RE: Cameray Gardens eml	2023-06-09	RE: Cameray Gardens(3).eml		1	21-Feb-24
PLA00137.00001	2	Email	RE: Cameray Gardens(3).eml	2023-06-09	RE: Cameray Gardens(2).eml		1	21-Feb-24
PLA00138.00001	1	Email	2023-06-16 Individual Contract of Purchase and Sale(5).eml	2023-06-16	Individual Contract of Purchase and Sale(4).eml		1	21-Feb-24
PLA00139.00001	1	Email	2023-06-16 Individual Contract of Purchase and Sale(4).eml	2023-06-16	Individual Contract of Purchase and Sale(3).eml		1	21-Feb-24
PLA00140.00001	2	Email	2023-06-19 RE: Individual Contract of Purchase and Sale(16).eml	2023-06-19	RE: Individual Contract of Purchase and Sale(15).eml		1	21-Feb-24
PLA00141.00001	1	Email	2023-06-19 RE: Individual Contract of Purchase and Sale(13).eml	2023-06-19	RE: Individual Contract of Purchase and Sale(12).eml		1	21-Feb-24
PLA00142.00001	2	Email	2023-06-21 RE: Individual Contract of Purchase and Sale(11).eml	2023-06-21	RE: Individual Contract of Purchase and Sale(10).eml		1	21-Feb-24
PLA00143.00001	17	Document	Cameray Gardens Schedule A.docx	2023-06-21			1	21-Feb-24
PLA00144.00001	2	Email	2023-06-21 RE: Individual Contract of Purchase and Sale(10).eml	2023-06-21	RE: Individual Contract of Purchase and Sale(9).eml		1	21-Feb-24
PLA00145.00001	3	Email	2023-07-02 RE: Individual Contract of Purchase and Sale(9).eml	2023-07-02	RE: Individual Contract of Purchase and Sale(8).eml		1	21-Feb-24
PLA00146.00001	1	Email	2023-07-04 FW: Individual Contract of Purchase and Sale(8).eml	2023-07-04	RE: Individual Contract of Purchase and Sale(7).eml		1	21-Feb-24
PLA00147.00001	3	Email	2023-07-17 RE: Individual Contract of Purchase and Sale(6).eml	2023-07-17	RE: Individual Contract of Purchase and Sale(5).eml		1	21-Feb-24
PLA00148.00001	4	Email	2023-07-17 RE: Individual Contract of Purchase and Sale(7).eml	2023-07-17	RE: Individual Contract of Purchase and Sale(6).eml		1	21-Feb-24
PLA00149.00001	4	Email	2023-07-20 RE: Individual Contract of Purchase and Sale(6).eml	2023-07-20	RE: Individual Contract of Purchase and Sale(5).eml		1	21-Feb-24
PLA00150.00001	4	Email	2023-07-20 RE: Individual Contract of Purchase and Sale(5).eml	2023-07-20	RE: Individual Contract of Purchase and Sale(4).eml		1	21-Feb-24
PLA00151.00001	4	Email	2023-07-20 RE: Individual Contract of Purchase and Sale(4).eml	2023-07-20	Redline - [DRAFT] Lawson_Lundell_Form_of_Contract_of_Purchase_and_Sale - Cameray Gardens - LL_Initial_and_[DRAFT] Lawson_Lundell_Form_of_Contract_of_Purchase_and_Sale - Cameray Gardens - HG_Edits.docx		1	21-Feb-24
PLA00152.00001	21	PDF	2023-07-20 [DRAFT] Lawson_Lundell_Form_of_Contract_of_Purchase_and_Sale - Cameray Gardens - HG_Edits.docx	2023-07-20			1	21-Feb-24
PLA00153.00001	19	Document	[DRAFT] Lawson_Lundell_Form_of_Contract_of_Purchase_and_Sale(3).eml	2023-07-20	Redline - [DRAFT] Lawson_Lundell_Form_of_Contract_of_Purchase_and_Sale(2).eml		1	21-Feb-24
PLA00154.00001	21	PDF	2023-07-20 Redline - [DRAFT] Lawson_Lundell_Form_of_Contract_of_Purchase_and_Sale(3).eml	2023-07-20	Redline - [DRAFT] Lawson_Lundell_Form_of_Contract_of_Purchase_and_Sale(2).eml		1	21-Feb-24
PLA00155.00001	21	PDF	2023-07-20 Redline - [DRAFT] Lawson_Lundell_Form_of_Contract_of_Purchase_and_Sale(2).eml	2023-07-20	Redline - [DRAFT] Lawson_Lundell_Form_of_Contract_of_Purchase_and_Sale(1).eml		1	21-Feb-24
PLA00156.00001	19	Document	[DRAFT] Lawson_Lundell_Form_of_Contract_of_Purchase_and_Sale(2).eml	2023-07-20	Redline - [DRAFT] Lawson_Lundell_Form_of_Contract_of_Purchase_and_Sale(1).eml		1	21-Feb-24
PLA00157.00001	6	Email	2023-07-24 RE: Individual Contract of Purchase and Sale(2).eml	2023-07-24	RE: Individual Contract of Purchase and Sale(1).eml		1	21-Feb-24
PLA00158.00001	6	Email	2023-07-24 RE: Individual Contract of Purchase and Sale(2).eml	2023-07-24	RE: Individual Contract of Purchase and Sale(1).eml		1	21-Feb-24
PLA00159.00001	1	Email	2023-07-26 Individual Contract of Purchase and Sale - Cameray Gardens(2).eml	2023-07-26	Redline - [DRAFT] Lawson_Lundell_Form_of_Contract_of_Purchase_and_Sale - Cameray Gardens(2).eml		1	21-Feb-24
PLA00160.00001	22	PDF	2023-07-26 Redline - [DRAFT] Lawson_Lundell_Form_of_Contract_of_Purchase_and_Sale - Cameray Gardens(2).eml	2023-07-26	Redline - [DRAFT] Lawson_Lundell_Form_of_Contract_of_Purchase_and_Sale - Cameray Gardens(1).eml		1	21-Feb-24
PLA00161.00001	7	Document	2023-07-26 Cameray Gardens - Contract of Purchase_and_Sale_(CBA-BCREA_form).DOCX	2023-07-26	RE: Individual Contract of Purchase and Sale - Cameray Gardens(6).eml		1	21-Feb-24
PLA00162.00001	1	Email	2023-07-28 RE: Individual Contract of Purchase and Sale - Cameray Gardens(6).eml	2023-07-28	RE: Individual Contract of Purchase and Sale - Cameray Gardens(5).eml		1	21-Feb-24
PLA00163.00001	2	Email	2023-07-28 FW: Individual Contract of Purchase and Sale - Cameray Gardens(3).eml	2023-07-28	RE: Individual Contract of Purchase and Sale - Cameray Gardens(2).eml		1	21-Feb-24
PLA00164.00001	2	Email	2023-07-28 RE: Individual Contract of Purchase and Sale - Cameray Gardens(7).eml	2023-07-28	RE: Individual Contract of Purchase and Sale - Cameray Gardens(6).eml		1	21-Feb-24

Document	2023-07-28	DRAFT_Lawson_Lundell_Form_of_Contract_of_Purchase_and_Sale_-_Cameray_Gardens_-_HG_Edits.DOCX	Jillian Sych <jsych@lawsonlundell.com>	21-Feb-24
PLA00165.00001	19	Document		1
PLA00166.00001	2	Email	Jennifer Williams <jwilliams@harpergrey.com>	1
PLA00167.00001	2	RE: Individual Contract of Purchase and Sale - Cameray Gardens(6).eml	REDACTED	1
PLA00168.00001	2	RE: Individual Contract of Purchase and Sale - Cameray Gardens(6).eml	Solicitor-Client Privilege 1	21-Feb-24
PLA00169.00001	2	RE: Individual Contract of Purchase and Sale - Cameray Gardens(6).eml	Jennifer Williams <jwilliams@harpergrey.com>	1
PLA00170.00001	2	RE: Individual Contract of Purchase and Sale - Cameray Gardens(4).eml	Jennifer Williams <jwilliams@harpergrey.com>	1
PLA00171.00001	7	RE: Individual Contract of Purchase and Sale - Cameray Gardens(3).eml	Lisa Frey <lfrey@lawsonlundell.com>	21-Feb-24
PLA00172.00001	28	RE: 3925 Kingsway (5715 Jersey Ave.), Burnaby.msig	Ed Wilson <ewilson@lawsonlundell.com>	21-Feb-24
PLA00173.00001	1	PDF	Jennifer Williams <jwilliams@harpergrey.com>	1
PLA00174.00001	1	PDF	Phillips, Michael <michael.phillips@burnaby.ca>	21-Feb-24
PLA00175.00001	2	Individual Contract of Purchase and Sale - Cameray Gardens(2).eml	Matthew Cheng <malthew@mccl.ca>	1
PLA00176.00001	2	RE: Individual Contract of Purchase and Sale - Cameray Gardens(2).eml	"lfrey@lawsonlundell.com" <lfrey@lawsonlundell.com>	1
PLA00177.00001	1	PDF	Margaret Kwan <mikwan@harpergrey.com>	21-Feb-24
PLA00178.00001	2	RE: Individual Contract of Purchase and Sale - Cameray Gardens(4).eml	Lisa Frey <lfrey@lawsonlundell.com>	1
PLA00179.00001	1	PDF		21-Feb-24
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