



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

NOTICE OF CIVIL CLAIM

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

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

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

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

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

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

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

Time for response to civil claim

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

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

CLAIM OF THE PLAINTIFF

Part 1: STATEMENT OF FACTS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Part 2: RELIEF SOUGHT

13. 573 claims against the defendants as follows:

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

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

Part 3: LEGAL BASIS

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

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

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

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

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

Plaintiff's address for service:

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

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

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

Email address for service (if any):

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

Place of trial:

Vancouver, British Columbia

The address of the registry is:

Vancouver Law Courts
800 Smithe Street
Vancouver, British Columbia

Date: December 18, 2023



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

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

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

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

APPENDIX

Part 1: CONSISE SUMMARY OF NATURE OF CLAIM:

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

Part 2: THIS CLAIM ARISES FROM THE FOLLOWING:

A personal injury arising out of:

- a motor vehicle accident
- medical malpractice
- another cause

A dispute concerning:

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

Part 3: THIS CLAIM INVOLVES:

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

Part 4: ENACTMENTS:

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

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

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

Schedule "A"

STRATA LOTS – OWNERS

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

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

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

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

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

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

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

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

Schedule "B"

STRATA LOTS – LEGAL DESCRIPTIONS

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

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

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

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

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

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

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

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

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

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