



IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF  
SECTION 179.1 OF THE *SECURITIES ACT*, RSBC 1996, C. 418

BETWEEN:

BRITISH COLUMBIA SECURITIES COMMISSION

PETITIONER

AND:

SIU MUI “DEBBIE” WONG  
SIU KON “BONNIE” SOO  
ORIGIN BUSINESS PARK INC., formerly known as  
WHEATLAND INDUSTRIAL PARK INC.  
1300302 ALBERTA INC.  
D & E ARCTIC INVESTMENTS INC.  
WAI HUNG WONG, ALSO KNOWN AS GILBERT WAI HUNG WONG  
CHEN LIANG TAO AND JAE WAN CHOW  
NGAI FUNG CHOW AND SAU LAN CHOW  
DANNY CHOW, EXECUTOR OF THE WILL OF NGAI MO CHOW,  
DECEASED  
BRIAN BOTTEM, MARIA BOTTEM, IAN RICHARDSON

RESPONDENTS

NOTICE OF APPLICATION

**NAME OF APPLICANT:** MNP Ltd. (the “**Receiver**”), in its capacity as receiver of the assets and undertakings and property of Siu Mui “Debbie” Wong, Siu Kon “Bonnie” Soo, Origin Business Park Inc., formerly known as Wheatland Industrial Park Inc., 1300302 Alberta Inc. and D & E Arctic Investments Inc. (collectively, the “**Debtors**”) appointed by the Order of the Honourable Mr. Justice Groves, made herein on October 2, 2019

**To:** The Service List attached hereto as **Schedule “A”** and to:

**Maria Bottem**  
26678 100 Avenue  
Maple Ridge, BC V2W 1S5

**Brian Bottem**  
26678 100 Avenue  
Maple Ridge, BC V2W 1S5

**Ian Richardson**  
26678 100 Avenue  
Maple Ridge, BC V2W 1S5

TAKE NOTICE that an application will be made by the applicant, . . . , to the presiding Judge in Chambers at the courthouse at **800 Smithe Street, Vancouver, B.C.** on **December 13, 2022**, at **9:45 a.m.** for the order(s) set out in Part 1 below.

**PART 1: ORDER(S) SOUGHT**

1. An Order that:
  - (a) Chen Liang Tao, Jae Wan Chow, Ngai Fung Chow, Sau Lan Chow, and Danny Chow, as Executor of the Will of Ngai Mo Chow, Deceased, Brian Bottem, Maria Bottem, and Ian Richardson be removed as Respondents to this proceeding; and
  - (b) Derek Wai Git Wong and Farm Credit Canada, be joined as Respondents to this proceeding, *nunc pro tunc*,  
and that amendment and service of an Amended Petition be dispensed with, and dispensing with the terms of Rule 6-2(8) of the Rules of Court, in the form attached as **Schedule "B"**;
2. An Order Approving the sale of the Receiver's interest in and to the subject lands and premises, as described below, in the form attached as **Schedule "C"** hereto, with blacklined copy from the Model Approval and Vesting Order attached as **Schedule "D"**; and
3. An Order, in the form attached as **Schedule "E"** that:
  - (a) The activities of MNP Ltd. (the "**Receiver**") from April 6, 2022 to date as set out in the Receiver's Second Report to the Court dated November 22, 2022, and filed herein (the "**Receiver's 2<sup>nd</sup> Report**"), be approved.
  - (b) The Receiver's interim fees and disbursements, and the interim fees and disbursements of the Receiver's counsel, as set out in the Receiver's 2<sup>nd</sup> Report, the Affidavit of Patty Wood sworn November 23, 2022, and the Affidavit of William L. Roberts, sworn November 23, 2022, be approved summarily.
  - (c) The Receiver's Interim Statement of Receipts and Disbursements for the period ending November 21, 2022, as set out in the Receiver's 2<sup>nd</sup> Report, be approved summarily.
4. Such further and other relief as counsel may request and this Court may grant.

## PART 2: FACTUAL BASIS

### OVERVIEW

1. By Order pronounced on October 3, 2019, and amended on August 27, 2021, (the “**Receivership Order**”), the Receiver was appointed over certain assets, undertakings, and property of the Debtors, including all proceeds therefrom (the “**Property**”).
2. The Petitioner, the British Columbia Securities Commission (the “**Commission**”), applied for the appointment of the Receiver to assist with the orderly recovery and distribution of funds to investors who were defrauded by the Debtors.
3. The Receiver seeks three orders from the Court:
  - (a) An Order to add/remove certain respondents;
  - (b) An Order approving a sale of Sui Mui “Debbie” Wong’s undivided quarter interest in a commercial property with a civic address at 7192 120<sup>th</sup> Street, Surrey, British Columbia (the “**120<sup>th</sup> Street Lands**”) to Ngai Woon Chow; and
  - (c) Approval of the Receiver’s activities, fees and fees of its legal counsel from April 7, 2022 to November 22, 2022.

### APPLICATION TO ADD/REMOVE RESPONDENTS

4. On April 21, 2022, the Receiver sought and was granted an Order approving the sale of another property being the subject of the Receivership, located at 26678 100 Avenue, Maple Ridge, B.C. (the “**100 Avenue Lands**”).
5. At that application, the Receiver also sought and was granted an Order to add the third-party owners and occupants of the 100 Avenue Lands as Respondents to the proceeding, as they were necessary and proper parties to be added in order to facilitate the transfer of title of the 100 Avenue Lands. As a result, the following individuals were added as Respondents to the proceeding by order of the Court pronounced on April 21, 2022: Chen Liang Tao, Jae Wan Chow, Ngai Fung Chow, Sau Lan Chow, and Danny Chow, as Executor of the Will of Ngai Mo Chow, Deceased, Brian Bottem, Maria Bottem, and Ian Richardson (collectively, the “**100 Avenue Owners and Occupants**”).
6. It was the intention of the Receiver to discontinue this proceeding as against the 100 Avenue Owners and Occupants upon completion of the sale of the 100 Avenue Lands. The sale of the 100 Avenue Lands was completed on May 24, 2022 and, accordingly, the 100 Avenue Owners and Occupants no longer have an interest in this proceeding. Accordingly, the Receiver is seeking an Order to remove the 100 Avenue Owners and Occupants as named Respondents to the proceeding.

7. Farm Credit Canada and Derek Wai Git Wong are each holders of charges against title to the Lands that will be discharged from title to the 120<sup>th</sup> Street Lands through the proposed sale, as follows:

Nature of Charge	Registration No.	Registered Owner
Right of First Refusal	CA3171252	Derek Wai Git Wong, as to the interest of Debbie
Judgment	CA6365587, renewed by CA7639427 and CA9183886	Farm Credit Canada, as to the interest of Debbie

8. Farm Credit Canada and Derek Wai Git Wong are not currently parties to the proceeding. Accordingly, for the limited purpose of being able to effect transfer of title to the Lands, and release the above-noted charges from title to the Lands, the Receiver is seeking an Order to add Farm Credit Canada and Derek Wai Git Wong as Respondents to the proceeding, as they are necessary and proper parties to the proceeding.
9. Notice of the application will be given to Derek Wai Git Wong and Farm Credit Canada.

#### **THE 120<sup>TH</sup> STREET LANDS**

10. The 120<sup>th</sup> Street Lands are commercial property located in Surrey. The registered owners include Ms. Wong, as to an undivided 25% interest, Ngai Woon Chow (“**Mr. Chow**”) as to an undivided 50% interest, and the Estate (as defined in the Receiver’s First Report), as to an undivided 25% interest. Mr. Chow is the brother of Ms. Wong.
11. The Receiver understands that Mr. Chow manages the 120<sup>th</sup> Street Lands. Accordingly, the Receiver requested that Mr. Chow provide the Receiver with copies of the commercial leases as well as information and documents pertaining to rental income and operating expenses. The Receiver received certain historical operating and financial information.

#### **Fair Market Value**

12. The 2022 assessment of the 120<sup>th</sup> Street Land as of July 1, 2021, is \$5,272,000.
13. In order to assess the fair market value of the 120<sup>th</sup> Street Lands, the Receiver obtained an appraisal and market valuations from two commercial realtors.
14. Grover Elliot & Co. Ltd., Real Estate Appraisers issued a Narrative Appraisal Report which set out the estimated market value of the 120<sup>th</sup> Street Lands as at October 14, 2021 to be \$4,580,000.
15. The Receiver retained Colliers International (“**Colliers**”) to provide a market valuation of the 120<sup>th</sup> Street Lands, and in September 2021, Colliers estimated a market value ranging between approximately \$3,900,000 and \$4,500,000. Colliers subsequently advised the Receiver that demolition clauses added to new leases and leases renewals would likely

make the 120<sup>th</sup> Street Lands more attractive to developers, and with these changes Colliers estimated the market value could increase to between approximately \$5,500,000 and \$6,300,000.

16. In 2022, the Receiver obtained a further market valuation from Avison Young Commercial Real Estate Services, LP (“**Avison Young**”). Avison Young issued a Market Evaluation Report which set out an estimated market value of \$6,750,000 for the 120<sup>th</sup> Street Lands effective May 5, 2022.

### The Security

17. The Receiver’s legal counsel reviewed the following three mortgages registered against the 120<sup>th</sup> Street Lands:
- a) a mortgage registered on January 13, 2013, in favour of Royal Bank of Canada against the entire 120<sup>th</sup> Street Lands, which was subsequently assigned to South Town Enterprises Ltd. on September 15, 2015-(the “**South Town Mortgage**”);
  - b) a mortgage registered on June 10, 2013, in favour of Mr. Chow and Kwan Chyiu Chow against Ms. Wong’s 25% interest in the 120<sup>th</sup> Street Lands (the “**Chow’s Mortgage**”); and
  - c) a mortgage registered on June 10, 2013, in favour of Gilbert Wong against Ms. Wong’s undivided 25% interest in the 120<sup>th</sup> Street Lands (“**Mr. Wong’s Mortgage**” and together with the Chow’s Mortgage and the South Town Mortgage, the “**Security**”).
18. Mr. Chow alleges that the South Town Mortgage was modified pursuant to an unregistered modification dated June 8, 2016.
19. On March 29, 2022, counsel for Mr. Chow advised the Receiver that the principal balance owing on the South Town Mortgage was \$962,740.49 with interest accruing at 5% per annum. Mr. Chow’s counsel also confirmed that interest only payments were made on the South Town Mortgage from rental income generated from the 120<sup>th</sup> Street Property.
20. The Chow’s Mortgage allegedly secured a promissory note dated January 14, 2013, in the principal amount of \$500,000 signed by Ms. Wong in favour of Mr. Chow and Kwan Chyiu Chow.
21. Mr. Wong’s Mortgage allegedly secured a promissory note dated January 14, 2013, in the principal amount of \$250,000 signed by Ms. Wong in favour of Mr. Wong.

### Proposed sale of 120<sup>th</sup> Street Lands

22. As reported in the Receiver’s First Report, an offer by Mr. Chow’s wife and son to purchase Ms. Wong’s 25% interest in the 120<sup>th</sup> Street Lands was made to the Receiver on December 1, 2021. The Receiver did not accept the offer submitted but proposed a

counteroffer. Various offers were exchanged between the parties, but an agreement was not reached, and negotiations concluded.

23. In March 2022, the Receiver received an unsolicited offer in the amount of \$5,300,000 to purchase the 120<sup>th</sup> Street Lands. The offer was not in a form that could be considered by the Receiver.
24. Also in March 2022, legal counsel representing Mr. Chow approached the Receiver about Mr. Chow purchasing Ms. Wong's interest in the 120<sup>th</sup> Street Lands.
25. Mr. Chow submitted an offer which was not accepted by the Receiver, and the Receiver submitted a counteroffer. From March 2022 to October 2022, Mr. Chow and the Receiver engaged in extensive negotiations before reaching an agreement, subject only to Court approval, with respect to the purchase and sale of Ms. Wong's undivided 25% interest in the 120<sup>th</sup> Street Lands and related commercial leases (the "**Purchased Interest**") for a sale price of \$850,000. The negotiations were conducted on a without prejudice basis as the parties exchanged their respective positions about the enforceability of the Security.
26. Mr. Chow and the Receiver entered into a Property Purchase and Sale Agreement dated November 10, 2022 (the "**120<sup>th</sup> Street Sale Agreement**"). A copy of the 120<sup>th</sup> Street Sale Agreement is attached as Appendix "A" to the Receiver's Second Report.
27. Pursuant to the terms of the 120<sup>th</sup> Street Sale Agreement, Mr. Chow paid a deposit toward the purchase price in the amount of \$100,000 which is being held in trust by the Receiver's legal counsel.
28. The material terms of the proposed transaction are as follows:
  - a) Purchase Price: \$850,000 (plus Goods and Service Tax, if applicable);
  - b) Conditions Precedent: Court approval only;
  - c) Closing Date: January 17, 2023, or such other date as may be agreed to by the 120<sup>th</sup> Street Purchaser and the Receiver;
  - d) Satisfaction of Purchase Price: The purchase price shall be paid by application of the deposit in the amount of \$100,000, and payment of the balance by the Closing Date.
29. The purchase price is not subject to any adjustments at closing, including adjustments for income and expense items, or other standard adjustments such as property taxes and utilities. All taxes payable in connection with the sale of the Purchased Interest shall be the responsibility of the 120<sup>th</sup> Street Purchaser.
30. The Purchased Interest shall be conveyed to the 120<sup>th</sup> Street Purchaser subject to the Permitted Encumbrances (as defined in the 120<sup>th</sup> Street Sale Agreement) which include the three registered mortgages.

31. The sale is to be completed on an “as is, where is” basis with no surviving representations or warranties being made by the Receiver.
32. Prior to reaching an agreement with the 120<sup>th</sup> Street Purchaser, the Receiver considered the various valuations which estimated the market value of the 120<sup>th</sup> Street Lands to range between approximately \$3,900,000 and \$6,750,000, or between \$975,000 and \$1,687,500 for a 25% interest. The Receiver also considered the enforceability issues with respect to the Security and amounts claimed in respect of the Security, real estate commissions, and other costs that would be incurred should the Receiver list the 120<sup>th</sup> Street Lands for sale.
33. The Receiver is satisfied that the proposed sale represents the present market value of Ms. Wong’s 25% interest in the 120<sup>th</sup> Street Lands. Accordingly, the Receiver recommends that the Court approve the proposed sale to the 120<sup>th</sup> Street Purchaser.

#### **THE ACTIVITIES OF THE RECEIVER**

34. By Order of the Court pronounced April 21, 2022, the activities of the Receiver from October 3, 2019 to April 6, 2022 were approved by the Court. These activities included are summarized in the Receiver’s First Report to the Court and included marketing and selling the Debtors’ fractional interests in various real property and realizing on funds held in trust from previous sales of property.
35. The Receiver’s activities from April 7, 2022 to November 22, 2022 included:
  - (a) Four court applications related to the realization and distribution of funds in various bank accounts held by the Debtors at various financial institutions;
  - (b) Application to sell Ms. Wong’s undivided quarter interest in the 100 Avenue Lands;
  - (c) Realizing on the Debtors’ interest in sale proceeds from 11456 Jasper Avenue, Edmonton, Alberta;
  - (d) Investigation into location of sale proceeds belonging to the Debtors in an unknown notary’s trust account in Alberta; and
  - (e) Negotiation of the sale of Ms. Wong’s undivided quarter interest in the 120<sup>th</sup> Street Lands.

#### **REMAINING DUTIES OF THE RECEIVER**

36. The remaining duties of the Receiver include:
  - (a) Further investigation of the Debtors’ interest in various shareholdings;

- (b) Completion of realization on Debtors' remaining funds held in the Debtors' bank accounts at various financial institutions;
- (c) Applying to the Court for a claims process and distribution order; and
- (d) Administering the claims process and distribution of the funds in the Receivership Estate.

#### **RECEIVER'S FEES AND DISBURSEMENTS**

- 37. The Receiver's fees and administration costs incurred in this matter from April 1, 2022 to October 31, 2022 was \$141,817.65 (including applicable taxes).
- 38. The time and disbursements incurred by the Receiver in the course of its duties are fair and reasonable in a receivership of the nature described herein. In the Receiver's opinion, the cost of this receivership is comparable to receivership assignments of similar scale and complexity.
- 39. The hourly rates charged by the Receiver are consistent with the average hourly rates billed by the Receiver on its other engagements and, to the Receiver's knowledge, consistent with other insolvency firms of comparable size engaged on similar receivership matters.
- 40. The Receiver requests that the Court summarily approve the Receiver's fees incurred from April 1, 2022 to October 21, 2022.

#### **RECEIVER'S LEGAL COUNSEL'S FEES AND COSTS**

- 41. The Receiver engaged Lawson Lundell LLP ("**Lawson**") as its independent legal counsel. The total fees of Lawson from April 1, 2022 to October 31, 2022, were \$105,162.60 inclusive of disbursements and taxes as summarized in Appendix E to the Report.
- 42. The Receiver has reviewed the invoices rendered to it by Lawson and believes them to be reasonable and proper. The legal services provided were necessary for the Receiver to fulfill its obligations in the proceeding.
- 43. The Receiver requests that the Court summarily approve the legal fees incurred

### **PART 3: LEGAL BASIS**

- 44. Based upon the facts set out in Part 2 above, the Receiver submits that the subject offer reflects the fair market value of Ms. Wong's undivided quarter interest in the 120<sup>th</sup> Street Lands, the sale is commercially reasonable, and that it will enable this Receivership to come to a conclusion.
- 45. The Receiver will rely on Rules 6-2 and 13-5 of the Supreme Court Civil Rules and s. 15 of the *Law and Equity Act*, R.S.B.C. 1996, c. 253.



46. The Receiver will also rely on the terms of the Receivership Order, as amended and restated from time to time.

**PART 4: MATERIAL TO BE RELIED ON**

1. Second Amended and Restated Receivership Order pronounced on June 29, 2022.
2. The Receiver's First Report to the Court dated April 6, 2022;
3. The Receiver's Second Report to the Court dated November 22, 2022;
4. Affidavit of Patty Wood sworn herein on November 23, 2022;
5. Affidavit of William L. Roberts sworn herein on November 23, 2022; and
6. Affidavit of Linda Alexander sworn herein on November 24, 2022.

The applicant(s) estimate(s) that the application will take **10 minutes** and will be heard by

- This matter is within the jurisdiction of a Master.
- This matter is not within the jurisdiction of a Master

**TO THE PERSONS RECEIVING THIS NOTICE OF APPLICATION:** If you wish to respond to this Notice of Application, you must, within 5 business days after service of this Notice of Application or, if this application is brought under Rule 9-7, within 8 business days after service of this Notice of Application:

- (a) file an Application Response in Form 33,
- (b) file the original of every affidavit, and every other document, that
  - (i) you intend to refer to at the hearing of this application, and
  - (ii) has not already been filed in the proceeding, and
- (c) serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:
  - (i) a copy of the filed Application Response;
  - (ii) a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on that person;
- (d) if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7(9).

Dated at the City of Vancouver, in the Province of British Columbia, this 25<sup>th</sup> day of November, 2022.



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Joel Schachter  
Lawson Lundell LLP  
Solicitors for the Applicant

**Filed by:**

William L. Roberts/Joel Schachter  
Lawson Lundell LLP  
1600 – 925 West Georgia Street  
Vancouver, British Columbia, V6C 3L2  
Telephone: 604-685-3456; Fax: 604-669-1620  
Email for Application: [wroberts@lawsonlundell.com](mailto:wroberts@lawsonlundell.com)

*To be completed by the court only:*

Order made

in the terms requested in paragraphs \_\_\_\_\_ of Part 1 of this Notice of Application

with the following variations and additional terms:

\_\_\_\_\_  
\_\_\_\_\_

Date:

\_\_\_\_\_  
Signature of  Judge  Master

**APPENDIX**

The following information is provided for data collection purposes only and is of no legal effect.

**THIS APPLICATION INVOLVES THE FOLLOWING:**

**Other – application by Receiver for Approval of Sale, Approval of Receiver’s Activities/Accounts and order to add/remove Respondents**

**SCHEDULE "A"**

**SERVICE LIST**

<p><b>Counsel for the Receiver:</b></p> <p><b>William Roberts</b>          Lawson Lundell LLP          1600 – 925 West Georgia Street,          Vancouver, B.C.,          V6C 3L2          Telephone: (604) 631-9163          Email: <a href="mailto:wroberts@lawsonlundell.com">wroberts@lawsonlundell.com</a></p>	<p><b>Receiver:</b></p> <p><b>Patty Wood</b>          MNP Ltd.          Suite 2200, MNP Tower          1021 West Hastings Street          Vancouver, BC V6E 0C3          Telephone: (604) 685-8408          Email: <a href="mailto:patty.wood@mnp.ca">patty.wood@mnp.ca</a></p>
<p><b>Petitioner</b></p>	
<p><b>Counsel for the Petitioner:</b>  <b>British Columbia Securities Commission</b></p> <p><b>William Roberts</b>          Lawson Lundell LLP          1600 – 925 West Georgia Street,          Vancouver, B.C.,          V6C 3L2          Telephone: (604) 631-9163          Email: <a href="mailto:wroberts@lawsonlundell.com">wroberts@lawsonlundell.com</a></p>	
<p><b>Respondents</b></p>	
<p><b>Siu Mui "Debbie" Wong</b>          16863 -58A Avenue          Surrey, BC V3S8P1  <a href="mailto:debbie16863@hotmail.com">debbie16863@hotmail.com</a></p>	<p><b>Siu Kon "Bonnie" Soo</b>          3311 Barmond Avenue          Richmond, BC V7E 1A1  <a href="mailto:siukonsoo@gmail.com">siukonsoo@gmail.com</a></p>
<p><b>1300302 Alberta Inc.</b>          1101, 3961 – 52<sup>nd</sup> Avenue NE          Calgary, AB T3J 0J7</p>	<p><b>D &amp; E Arctic Investments Inc.</b>          c/o Debbie Wong          16863 58A Avenue          Surrey, BC V3S 8P1</p>
<p><b>Origin Business Park, formerly known as          Wheatland Industrial Park Inc.</b>          1500, 222 – 3<sup>rd</sup> Avenue SW          Calgary, AB T2P 0B4</p>	
<p><b>Soo + Wong Companies</b></p>	

<p><b>1342565 Alberta Inc.</b>  <b>c/o Austin Wong in his capacity as Director of 1342565 Alberta Inc.</b>  56 – 6747 203 Street  Langley, BC V2Y 3B5</p>	<p><b>D &amp; C Atlantic Investments Inc</b>  c/o Debbie Wong, in her capacity as a senior officer of D &amp; C Atlantic Investments Inc.  16863 -58A Avenue  Surrey, BC V3S8P1  <u>debbie16863@hotmail.com</u></p>
<p><b>0793751 BC Ltd.</b>  c/o Its Registered Office  16863 58A Avenue  Surrey, BC V3S 8P1</p>	<p><b>0765306 B.C. Ltd.</b>  c/o Registered Office  16863 – 58A Avenue  Surrey, BC V3S 8P1</p> <p><b>0765306 B.C. Ltd., c/o Colleen Soo in her capacity as Director of 0765306 B.C. Ltd.</b>  3311 Barmond Avenue  Richmond, BC V7E 1A1</p>
<p><b>1376472 Alberta Ltd.</b>  c/o Debbie Wong, in her capacity as a senior officer of 1376472 Alberta Ltd.  16863 -58A Avenue  Surrey, BC V3S8P1  <u>debbie16863@hotmail.com</u></p>	<p><b>0879932 B.C. Ltd.</b>  c/o Its Registered Office  16863 58A Avenue  Surrey, BC V3S 8P1</p>
<p><b>0790333 B.C. Ltd.</b>  c/o Its Registered Office  Suite 205, 15240 – 56 Avenue  Surrey, BC V3S 5K7</p>	<p><b>0745188 B.C. Ltd.</b>  c/o Registered Office  205, 15240 – 56<sup>th</sup> Avenue  Surrey, BC V3S 5K7</p> <p><b>0745188 B.C. Ltd. c/o Justin Soo in his capacity as Director of 0745188 B.C. Ltd.</b>  3311 Barmond Avenue  Richmond, BC V7E 1A1</p>
<p><b>0774238 B.C. Ltd.</b>  c/o Its Registered Office  16863 58A Avenue  Surrey, BC V3S 8P1</p>	<p><b>1192657 Alberta Ltd.</b>  <b>c/o Austin Wong in his capacity as Director of 1192657 Alberta Inc.</b>  56 – 6747 203 Street  Langley, BC V2Y 3B5</p>
<p><b>1342558 Alberta Inc.</b>  c/o Registered Office  1101, 3961 52 Avenue NE  Calgary, AB T3J 0J7</p> <p><b>1342558 Alberta Inc. c/o Austin Wong in his capacity as Director of 1342558 Alberta Inc.</b>  56 – 6747 203 Street  Langley, BC V2Y 3B5</p>	<p><b>New City Enterprises Ltd.</b>  c/o Its Registered Office  501 – 1195 West Broadway  Vancouver, BC V6H 3X5</p>

<b>Non-Respondents (Joint Owners/Chargeholders)</b>		
<p><b>Gilbert Wei Hung Wong</b>  c/o Austin Wong and Derek Wong, Executors of  the Will of Wai Hung Wong, Deceased  c/o Lindsay Kenney LLP  Suite 1800, 401 West Georgia Street  Vancouver, B.C. V6B 5A1  <u>Attention:</u> J. Reilly Pollard  <u>RPollard@lklaw.ca</u></p>	<p><b>Kwok Kie Soo</b>  3311 Barmond Avenue  Richmond, BC V7E 1A1  <u>kwokiesoo@gmail.com</u></p>	
<p><b>Chen Liang Tao and Jae Wan Chow</b>  <b>Ngai Fung Chow and Sau Lan Chow</b>  <b>Danny Chow, Executor of the Will of Ngai Mo</b>  <b>Chow, Deceased</b>  c/o Edwin Soon Law Office  609 – 938 Howe Street  Vancouver, B.C. V6Z 1N9</p>	<p><b>Ngai Woon Chow</b>  <b>Kwan Chyi Chow (Deceased)</b>  <b>South Town Enterprises Ltd.</b>  c/o Lana K.L. Li  Kornfeld LLP  1100 One Bentall Centre  505 Burrard Street, Box 11  Vancouver, BC V7X 1M5  Email: <u>lli@kornfeldllp.com</u></p>	
<p><b>Derek Wai Git Wong</b>  c/o Lindsay Kenney LLP  Suite 1800, 401 West Georgia Street  Vancouver, B.C. V6B 5A1  <u>Attention:</u> J. Reilly Pollard</p>	<p><b>Farm Credit Canada</b>  Adnan Habib  Erin Stewart, Paralegal  Baker Newby LLP  200 – 2955 Gladwin Road  Abbotsford, BC V2T 5T4  Email: <u>AHabib@bakernewby.com</u>  <u>EStewart@bakernewby.com</u></p>	
<p><b>His Majesty the King Right of Canada, as</b>  <b>Represented by the Attorney General of</b>  <b>Canada</b>  c/o Department of Justice  900 – 840 Howe Street  Vancouver, BC V6Z 2W9  <u>gordon.carscadden@justice.gc.ca</u></p>		
<b>Non-Respondents (Investor Groups)</b>		
<b>Action No.</b>	<b>Plaintiffs</b>	<b>Counsel</b>
1401-10536 (ABQB)	DYMI Investments Ltd.	<p>Michael Bokhaut  Stones Carbert Waite LLP  200 Encor Place, 645 – 7<sup>th</sup> Avenue SW  Calgary, AB T2P 4G8    Email: <u>bokhaut@carbertainwaite.com</u></p>
1801-07295 (ABQB)	1305402 Inc.	<p>Brad J. Findlater  Wilson Laycraft  211 11 Avenue SW, Suite 650  Calgary, AB T2R 0C6</p>