



This is the 2nd Affidavit of Ashley Cheng  
in this case and was made on November 29, 2023

File No. S-217956  
VANCOUVER REGISTRY

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

IN THE MATTER OF THE STRATA PROPERTY ACT, S.B.C. 1998, C.43

and

IN THE MATTER OF THE APPLICATION FOR THE WIND-UP OF THE OWNERS,  
STRATA PLAN LMS 992

**AFFIDAVIT OF SERVICE**

I, Ashley Cheng, Legal Assistant of #1600-925 West Georgia Street, in the City of Vancouver, in the Province of British Columbia, AFFIRM THAT:

1. I am a Legal Assistant employed with the law firm of Lawson Lundell LLP, solicitors for Crowe MacKay & Company Ltd., liquidator of the Owners, Strata Plan LMS992 (the "**Liquidator**"), and as such have personal knowledge of the facts and matters hereinafter deposed to, save and except where the same are stated to be made upon information and belief, and, as to such facts, I verily believe the same to be true.

2. On November 16 and 17, 2023, I sent copies of the following documents by email or mail, along with a service letter (the "**Owner Service Letters**"), to all owners in accordance with the Order of Justice Riley, pronounce November 14, 2023 (the "**Order**"):

- (a) Notice of Application, filed November 14, 2023;
- (b) Affidavit #2 of Derek Lai, filed November 14, 2023;

(c) Affidavit #1 of Ashley Cheng, filed November 14, 2023; and

(d) the Order.

(the “**Application Materials**”).

3. Pursuant to the Order, the Application Materials were to be sent by email to the owners, or by mail where the owners had not provided an email address. Attached to this affidavit and marked as **Exhibit “A”** is a true copy of the contact information for all of the owners, which is referenced as Schedule “A” in the Order.

4. On November 16 and 17, 2023, I sent copies of the Owner Service Letters and Application Materials to the email addresses listed in Exhibit A.

5. I am informed by Bernadette Mestrih, a clerk in our deliveries department, and verily believe, that on November 17, 2023, the Owner Service Letters, enclosing copies of the Application Materials, were sent by regular mail to the six owners who had not provided email addresses. Attached to this affidavit and marked as **Exhibit “B”** is a true copy of the Owner Service Letters, dated November 17, 2023, that were sent by regular mail, without the enclosures.

6. Attached to this affidavit and marked as **Exhibit “C”** is a true copy of an email and photos from Leo Chan, the Property Manager, to Jillian Epp, counsel to the Liquidator, dated November 17, 2023. Mr. Chan confirmed that four copies of the Application Materials had been posted at the residential tower of 3380 Vanness Avenue, Vancouver, BC (“**Joyce Place**”) – two located on the first floor by the mailboxes and two located on the second floor outside the amenity room. Mr. Chan’s email also attaches photos of the posted Application Materials.

7. I have viewed the web page relating to the wind-up and proposed sale of Joyce Place: [www.joyceplacestrata.com](http://www.joyceplacestrata.com) and confirm that the Application Materials are posted to the website, in accordance with the Order. Attached to this affidavit and marked as **Exhibit “D”** is a true copy of an email from Kevin Bahng, Chief Information Officer at Lawson Lundell, to Ms. Epp, confirming that the Application Materials were posted to the website on November 16,

2023. Attached to this affidavit and marked as **Exhibit “E”** is a true copy of a screen shot of the web page taken on November 20, 2023.

8. I am informed by Ms. Mestrih, and verily believe, that on November 17, 2023, a copy of the Information Notice and the Order were mailed by regular mail to each chargeholder, along with a service letter (the “**Chargeholder Service Letters**”), in accordance with the Order. Attached to this affidavit and marked as **Exhibit “F”** are true copies of the Chargeholder Service Letters sent by regular mail, without the enclosures.

9. On November 27, 2023, the Chargeholder Service Letter and enclosed materials for the chargeholder of strata lot #21 (HSBC Bank Canada) was returned to our offices due to an incorrect address. The correct address is 885 West Georgia Street, Vancouver, BC, V6C 3G1. On November 27, 2023, I mailed out a revised copy of the Chargeholder Service Letter for strata lot #21 to the corrected address, along with enclosed copies of the Information Notice and the Order.

### **Responses from Owners**

10. On November 18, 2023, I received an email from Cynthia Guillergan, the owner of strata lot #36 in Joyce Place, in response to my email attaching the Owner Service Letter and Application Materials. Peter Roberts, counsel for the Liquidator, responded to Ms. Guillergan on November 20, 2023. Attached to this affidavit and marked as **Exhibit “G”** is a true copy of the email exchange between Ms. Guillergan and Mr. Roberts, dated November 18 and 20, 2023.

11. On November 19, 2023, I received an email from Peter Leung, the owner of strata lot #28 in Joyce Place, in support of the application the Liquidator intends to bring on December 4, 2023. Attached to this affidavit and marked as **Exhibit “H”** is a true copy of Mr. Leung’s email, dated November 19, 2023.

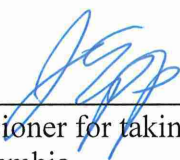
12. On November 19, 2023, Mr. Roberts received a letter and petition from Peter Byrne, the owner of strata lot #60 in Joyce Place, in support of the application the Liquidator intends to bring on December 4, 2023. Attached to this affidavit and marked as **Exhibit “I”** is a true copy of Mr. Byrne’s email, dated November 19, 2023, attaching his support letter and petition.

13. On November 21, 2023, I received an email from Carlos Cordeiro, the owner of strata lot #39 in Joyce Place, in support of the application the Liquidator intends to bring on December 4, 2023. Attached to this affidavit and marked as **Exhibit "J"** is a true copy of Mr. Cordeiro's email, dated November 21, 2023.

**Affidavit #2 of Derek Lai**


14. For reasons unknown to me, the document attached as Exhibit "P" to Affidavit #2 of Derek Lai, filed November 14, 2023, is missing several pages. This exhibit contained an email from Lisa Frey, counsel to the Liquidator, attaching summary notes of an Information Meeting held for the owners of Joyce Place that occurred on October 30, 2023, and a copy of a slide presentation that was shown at the Information Meeting. A complete and true copy of Exhibit "P" to Mr. Lai's Affidavit #2 is attached hereto and marked as **Exhibit "K"**.

AFFIRMED BEFORE ME at the City of Vancouver, in the Province of British Columbia, this 29 day of November, 2023.



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A Commissioner for taking Affidavits for British Columbia.



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Ashley Cheng

**JILLIAN E. EPP**  
*Barrister & Solicitor*  
**1600 - 925 WEST GEORGIA ST.**  
**VANCOUVER, B.C. V6C 3L2**  
**(604) 685-3456**

This is Exhibit "A" referred to in the 2nd affidavit of Ashley Cheng affirmed before me at Vancouver, November 29, 2023.



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A Commissioner for taking Affidavits within  
British Columbia.

## Schedule "A"

JOYCE PLACE  
3380 VANNESS AVE., VANCOUVER, B.C. V5R 5A8

2

SL	UNIT	PID	VENDORS	VENDOR ADDRESS	VENDOR EMAIL
1	3362	018-366-813	Forning Chan and Kevin Gan Chan	3362 Vanness Ave Vancouver, B.C. V5R 5A8	<a href="mailto:kcdeziagn@gmail.com">kcdeziagn@gmail.com</a>
2	3364	018-366-821	Sohail Merchant, as to an undivided 1/2 interest and Rashida Merchant, as to an undivided 1/2 interest	3364 Vanness Ave Vancouver, B.C. V5R 5A8	<a href="mailto:rashida.merchant2341@gmail.com">rashida.merchant2341@gmail.com</a>
3	3366	018-366-830	Panee Limapichat	3366 Vanness Ave Vancouver, B.C. V5R 5A8	<a href="mailto:paneelim@hotmail.com">paneelim@hotmail.com</a>
4	3368	018-366-848	Wilbert De Asis	3368 Vanness Ave Vancouver, B.C. V5R 5A8	<a href="mailto:deasiswilbert@yahoo.ca">deasiswilbert@yahoo.ca</a>
5	3370	018-366-856	Tung Chi Tran and Le Khanh Trang Ho	5489 Bruce Street Vancouver, B.C. V5P 3M4	<a href="mailto:tungtran1962@outlook.com">tungtran1962@outlook.com</a>
6	3372	018-366-864	Xi Run Zhu and Man Wen Chen	3372 Vanness Ave Vancouver, B.C. V5R 5A8	<a href="mailto:yuki12372@yahoo.com">yuki12372@yahoo.com</a>
7	3374	018-366-872	Van Quang Vu and Hoa Nguyen	3374 Vanness Ave Vancouver, B.C. V5R 5A8	<a href="mailto:juliechvu@gmail.com">juliechvu@gmail.com</a>
8	3376	018-366-881	Peggy Tong	3376 Vanness Ave Vancouver, B.,C. V5R 5A8	
9	3378	018-366-899	Kenneth Kwok Ying Chan and Mei Lin Yuen Chan	1996 Campbell Ave Port Coquitlam, B.C. V3C 4T2	<a href="mailto:kenneth1340@gmail.com">kenneth1340@gmail.com</a>
10	3382	018-366-902	Che Wing Chan and Yat Sin Wong	4738 Bruce Street Vancouver, B.C. V5N 3Z6	<a href="mailto:kathy.yclgroup@gmail.com">kathy.yclgroup@gmail.com</a>
11	3384	018-366-911	0837963 B.C. Ltd.	3384 Vanness Ave Vancouver, B.C. V5R 5A8	<a href="mailto:adipolo@hotmail.com">adipolo@hotmail.com</a>
12	301	018-366-929	Calvin Louie and Grace Louie	5243 Christopher Court Burnaby, B.C. V5H 2K3	<a href="mailto:graceklouie@gmail.com">graceklouie@gmail.com</a>
13	302	018-366-937	Jason Chan	302 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:evan.ic.chan@gmail.com">evan.ic.chan@gmail.com</a>
14	303	018-366-945	Kim Teng Tay and Jet Fah Chai	303 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	
15	304	018-366-953	Sean Anthony McKee	7348 144 Street Surrey, B.C. V3W 5S5	<a href="mailto:jasamk2199@gmail.com">jasamk2199@gmail.com</a>
16	305	018-366-961	Wai Ho Johnny Chan, as to an undivided 1/3 interest, Pui Man Lee, as to an undivided 1/3 interest, and Jimmy Wai Keung Chan, as to an undivided 1/3 interest	1233 E 53rd Ave Vancouver, B.C. V5X 1K1	<a href="mailto:johnnychan23836@gmail.com">johnnychan23836@gmail.com</a>

JOYCE PLACE  
3380 VANNESS AVE., VANCOUVER, B.C. V5R 5A8  
(37152 - 150991)

SL	UNIT	PID	VENDORS	VENDOR ADDRESS	VENDOR EMAIL
17	306	018-366-970	Michelle Benitez	306 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:mich_beni@yahoo.com">mich_beni@yahoo.com</a>
18	401	018-366-988	Victor Cortero Hallare and Aida Berce Hallare	401 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	
19	402	018-366-996	Celine Yvonne Diamond	402 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:diamond58@shaw.ca">diamond58@shaw.ca</a>
20	403	018-367-003	Angelita Lopez Ferrer	403 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:Angelitaf890@gmail.com">Angelitaf890@gmail.com</a>
21	404	018-367-011	Lai Kwan Yuen	404 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:laikwanyuen302@gmail.com">laikwanyuen302@gmail.com</a>
22	405	018-367-020	Chieh Tsang Dick Hsu	405 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:7731988@gmail.com">7731988@gmail.com</a>
23	406	018-367-038	Henry Romero Cabanizas and Precilda Padillo Cabanizas	406 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:precy613@icloud.com">precy613@icloud.com</a>
24	501	018-367-046	Roman Alejandro Chiang and Tak In Lao	501 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:ianet.chiang@hotmail.ca">ianet.chiang@hotmail.ca</a>
25	502	018-367-054	Hai Ming Wu	502 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:mayws2006@hotmail.com">mayws2006@hotmail.com</a>
26	503	018-367-062	David Clyde Mangelsdorf	205 - 3205 Wetherby Road Victoria, B.C. V8P 4A3	<a href="mailto:davemdorf@hotmail.com">davemdorf@hotmail.com</a>
27	504	018-367-071	Julius Cajetan Desilva, Enakshi Patro and Joseph Peter D'Silva	504 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:juliusdesilva@yahoo.com">juliusdesilva@yahoo.com</a>
28	505	018-367-089	Chuk Chuen Leung	505 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:peterccleung@yahoo.com">peterccleung@yahoo.com</a>
29	506	018-367-097	Merlita Sosa	506 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:mersosa2014@gmail.com">mersosa2014@gmail.com</a>

**JOYCE PLACE**  
**3380 VANNESS AVE., VANCOUVER, B.C. V5R 5A8**  
**(37152 - 150991)**

SL	UNIT	PID	VENDORS	VENDOR ADDRESS	VENDOR EMAIL
30	601	018-367-101	Ferdinand Magalued Aquino and Jocelyn Bambalan Aquino	601 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	ferdz777@gmail.com
31	602	018-367-119	Aiguo Xu and Xueying Yang	602 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	emilyyang168@hotmail.com
32	603	018-367-127	Seiichiro Tamura	2-14-5 Keyakizaka Kawanishi City, Japan 666-0145	thejailbirds696guitar@gmail.com
33	604	018-367-135	Li Wei Zhu	604 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	zlwzack@gmail.com
34	605	018-367-143	Tommy Jian Qiang Zhou	5894 Battison Street Vancouver, B.C. V5R 4M8	tizhou93@gmail.com
35	606	018-367-151	0753861 B.C. Ltd.	742 E. Cordova Street Vancouver, B.C. V6A 1M3	david_lee74@hotmail.com
36	701	018-367-160	Cynthia Paronable Guillergan	701 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	charm.1guillerganhs@gmail.com
37	702	018-367-178	Marilyn Maiso Tagab	702 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	
38	703	018-367-186	Zakia Saad	703 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	zakia_saad@yahoo.com
39	704	018-367-194	Carlos Jesus Cordeiro	704 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	cmira18@hotmail.com
40	705	018-367-208	Chitra Suryakumar	705 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	chitra.suryakumar@emirates.com
41	706	018-367-216	Daniel Agcaoili and Maryann Agcaoili	706 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	brotonelmary@gmail.com
42	801	018-367-224	Benjamin Abenojar Peralta and Febe Paclibare Peralta	801 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	fperalta@telus.net
43	802	018-367-232	Elsie Marayag and Renaldo Lucas Marayag	802 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	reymarayag@gmail.com



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SL	UNIT	PID	VENDORS	VENDOR ADDRESS	VENDOR EMAIL
44	803	018-367-241	Kwok-Wai Ricky Hon and Chiu Kwan Hon	803 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:annahon1960@gmail.com">annahon1960@gmail.com</a>
45	804	018-367-259	Yeuk Ching Ho	804 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	
46	805	018-367-267	Nader Parandakhteh	805 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:nader.par8@gmail.com">nader.par8@gmail.com</a>
47	806	018-367-275	Jennifer Reed and Timothy Joel Osier	806 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:tosier@shaw.ca">tosier@shaw.ca</a>
48	901	018-367-283	Florina Beley Tobias	901 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:fbtobias@yahoo.ca">fbtobias@yahoo.ca</a>
49	902	018-367-291	Kit Fong Lee	902 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:kitlee3380@gmail.com">kitlee3380@gmail.com</a>
50	903	018-367-305	Mila Savitski	903 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:savsavmir@gmail.com">savsavmir@gmail.com</a>
51	904	018-367-313	Wei Liu and Yan Hong Xie	904 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:wei3969@yahoo.ca">wei3969@yahoo.ca</a>
52	905	018-367-321	Letecia Marzan Banta, as to an undivided 1/100 interest and Noel Banta Banta, as to an undivided 99/100 interest	905 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:letbanta524@yahoo.ca">letbanta524@yahoo.ca</a>
53	906	018-367-330	Yick Kam Chan and Yin Bing Chan	906 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:fionachan3380@gmail.com">fionachan3380@gmail.com</a>
54	1001	018-367-348	Andrew Kwok Koo Cheung and Pearl Cheung	1001 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:pearlkaocheung@icloud.com">pearlkaocheung@icloud.com</a>
55	1002	018-367-356	Ha Dang	1002 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	
56	1003	018-367-364	Brian Yan Muk	1003 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:b.yanmuk@gmail.com">b.yanmuk@gmail.com</a>

JOYCE PLACE  
 3380 VANNESS AVE., VANCOUVER, B.C. V5R 5A8  
 (37152 - 150991)

SL	UNIT	PID	VENDORS	VENDOR ADDRESS	VENDOR EMAIL
57	1004	018-367-372	Teresa Louise Dirks and Douglas John Dirks	1004 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:mini1015.td@gmail.com">mini1015.td@gmail.com</a>
58	1005	018-367-381	Vivian Wai Blaker	1005 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:blaker@sfu.ca">blaker@sfu.ca</a>
59	1006	018-367-399	Harinder Singh Khangura	1006 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:herak21@hotmail.com">herak21@hotmail.com</a>
60	1101	018-367-402	Peter Byrne and Ann Byrne	1101 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:peter@kasselpainting.com">peter@kasselpainting.com</a>
61	1102	018-367-411	Ka Lok Chan, as to an undivided 90/100 Interest and Che Wing Chan, as to an undivided 10/100 interest	1102 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:kathy.vclgroup@gmail.com">kathy.vclgroup@gmail.com</a>
62	1103	018-367-429	Simon Davison	1103 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:simondavison@gmail.com">simondavison@gmail.com</a>
63	1104	018-367-437	Sean Dimitrie	1104 - 3380 Vanness Ave Vancouver, B.C. V5R 6B8	<a href="mailto:seandimitrie@gmail.com">seandimitrie@gmail.com</a>



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

This is Exhibit "B" referred to in the 2nd affidavit of Ashley Cheng affirmed before me at Vancouver, November 29, 2023.

  
A Commissioner for taking Affidavits within  
British Columbia.

November 17, 2023

BY REGULAR MAIL

Peggy Tong  
3376 Vanness Avenue  
Vancouver, BC V5R 5A8

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place".

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Notice of Application, filed November 14, 2023;
2. Affidavit #2 of Derek Lai, filed November 14, 2023;
3. Affidavit #1 of Ashley Cheng, filed November 14, 2023; and
4. The Order for substituted service made by Justice Riley, entered November 14, 2023.

You can access more information and materials filed with the court at [www.joyceplacestrata.com](http://www.joyceplacestrata.com).

You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP



Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com



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

November 17, 2023

BY REGULAR MAIL

Kim Teng Tay and Jet Fah Chai  
303 – 3380 Vanness Avenue  
Vancouver, BC V5R 6B8

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

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4. The Order for substituted service made by Justice Riley, entered November 14, 2023.

You can access more information and materials filed with the court at [www.joyceplacestrata.com](http://www.joyceplacestrata.com).

You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com



Suite 1600 Cathedral Place  
925 West Georgia Street  
Vancouver, BC  
Canada V6C 3L2  
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November 17, 2023

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com

BY REGULAR MAIL

Victor Cortero Hallare and Aida Berce Hallare  
401 – 3380 Vanness Avenue  
Vancouver, BC V5R 6B8

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

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Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.



Suite 1600 Cathedral Place  
925 West Georgia Street  
Vancouver, BC  
Canada V5C 3L2  
T: 604.685.3456

November 17, 2023

BY REGULAR MAIL

Marilyn Maiso Tagab  
702 – 3380 Vanness Avenue  
Vancouver, BC V5R 6B8

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as “Joyce Place”.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Notice of Application, filed November 14, 2023;
2. Affidavit #2 of Derek Lai, filed November 14, 2023;
3. Affidavit #1 of Ashley Cheng, filed November 14, 2023; and
4. The Order for substituted service made by Justice Riley, entered November 14, 2023.

You can access more information and materials filed with the court at [www.joyceplacestrata.com](http://www.joyceplacestrata.com).

You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.



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

November 17, 2023

BY REGULAR MAIL

Yeuk Ching Ho  
804 – 3380 Vanness Avenue  
Vancouver, BC V5R 6B8

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as “Joyce Place”.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

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Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.



Suite 1600 Cathedral Place  
925 West Georgia Street  
Vancouver, BC  
Canada V5C 3L2  
T: 604.685.3456

November 17, 2023

BY REGULAR MAIL

Ha Dang  
1002 – 3380 Vanness Avenue  
Vancouver, BC V5R 6B8

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as “Joyce Place”.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Notice of Application, filed November 14, 2023;
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4. The Order for substituted service made by Justice Riley, entered November 14, 2023.

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You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com



## Jillian Epp (3602) - 14Flr

---

**From:** Leo Chan <leo.chan@dwelproperty.ca>  
**Sent:** Friday, November 17, 2023 2:08 PM  
**To:** Jillian Epp (3602) - 14Flr  
**Cc:** Peter Roberts (3158) - 14Flr  
**Subject:** RE: Joyce Place Windup - Substituted Service of Application Materials  
**Attachments:** IMG-20231117-WA0008.jpg; IMG-20231117-WA0007.jpg

[THIS MESSAGE ORIGINATED FROM OUTSIDE OUR FIRM]

---

Hi Jillian,

As per our conversation, four physical copies have been prepared and posted at LMS3998 on Nov 17<sup>th</sup>, 2023.

- 1) 2 by 1<sup>st</sup> floor mailboxes (WA0007.jpg)
- 2) 2 by 2<sup>nd</sup> level just outside their amenity room (WA0008.jpg)

Best Regards,

Leo Chan BSc. | Property Manager



2014 to 2023 Consumer Choice Award for Best Residential Property Management Vancouver

[www.dwellproperty.ca](http://www.dwellproperty.ca) | [leo.chan@dwelproperty.ca](mailto:leo.chan@dwelproperty.ca)

**Dwell Property Management** | Suite 170 – 4311 Viking Way, Richmond, BC V6V 2K9  
 Dir. 604.248.1011 ph. 604.821.2999

**From:** Jillian Epp <jepp@lawsonlundell.com>  
**Sent:** Thursday, November 16, 2023 4:20 PM  
**To:** Leo Chan <leo.chan@dwelproperty.ca>  
**Cc:** Peter Roberts <proberts@lawsonlundell.com>  
**Subject:** RE: Joyce Place Windup - Substituted Service of Application Materials

Hi Leo,

Just got your VM, sorry I missed your call. Your plan sounds great, could you please send us an email once you've finished doing that?

I don't think we need to mail you a set of the materials if you'll arrange to print them.

Best,  
 Jill

This is Exhibit "C" referred to in the 2nd affidavit of Ashley Cheng affirmed before me at Vancouver, November 29, 2023.

*J. Epp*

---

A Commissioner for taking Affidavits within  
British Columbia.

Jillian Epp (she/her) | Associate  
Lawson Lundell LLP  
D 604.631.3602 | F 604.669.1620

**From:** Leo Chan <[leo.chan@dwelproperty.ca](mailto:leo.chan@dwelproperty.ca)>  
**Sent:** Thursday, November 16, 2023 4:17 PM  
**To:** Jillian Epp (3602) - 14Flr <[jepp@lawsonlundell.com](mailto:jepp@lawsonlundell.com)>  
**Cc:** Peter Roberts (3158) - 14Flr <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>  
**Subject:** RE: Joyce Place Windup - Substituted Service of Application Materials

[THIS MESSAGE ORIGINATED FROM OUTSIDE OUR FIRM]

I will post both copies online.

As well, four physical copies will be on the 1<sup>st</sup> and 2<sup>nd</sup> floor bulletin board.  
We will need a day to get that printed and bind from Staples, then we will hang their in the lobby area.

Best Regards,

Leo Chan BSc. | Property Manager



*2014 to 2023 Consumer Choice Award for Best Residential Property Management Vancouver*

[www.dwellproperty.ca](http://www.dwellproperty.ca) | [leo.chan@dwelproperty.ca](mailto:leo.chan@dwelproperty.ca)

**Dwell Property Management** | Suite 170 – 4311 Viking Way, Richmond, BC V6V 2K9  
Dir. 604.248.1011 ph. 604.821.2999


**From:** Jillian Epp <[jepp@lawsonlundell.com](mailto:jepp@lawsonlundell.com)>  
**Sent:** Thursday, November 16, 2023 3:49 PM  
**To:** Leo Chan <[leo.chan@dwelproperty.ca](mailto:leo.chan@dwelproperty.ca)>  
**Cc:** Peter Roberts <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>  
**Subject:** Joyce Place Windup - Substituted Service of Application Materials

Hi Leo,

I'm helping Peter with the strata wind-up. As you know, we had to get a sub-service order for the upcoming application to approve the recent PSA extension. Justice Riley granted the order on Tuesday (a copy is attached). One of the terms of the Order is that the application materials (attached document package) be posted on the notice board of the second floor lobby of Joyce Place. Are you able to do this for us, or do you know a resident who would be able to?

The document package is quite large (over 100 pages), but we could arrange to have it mailed to you.

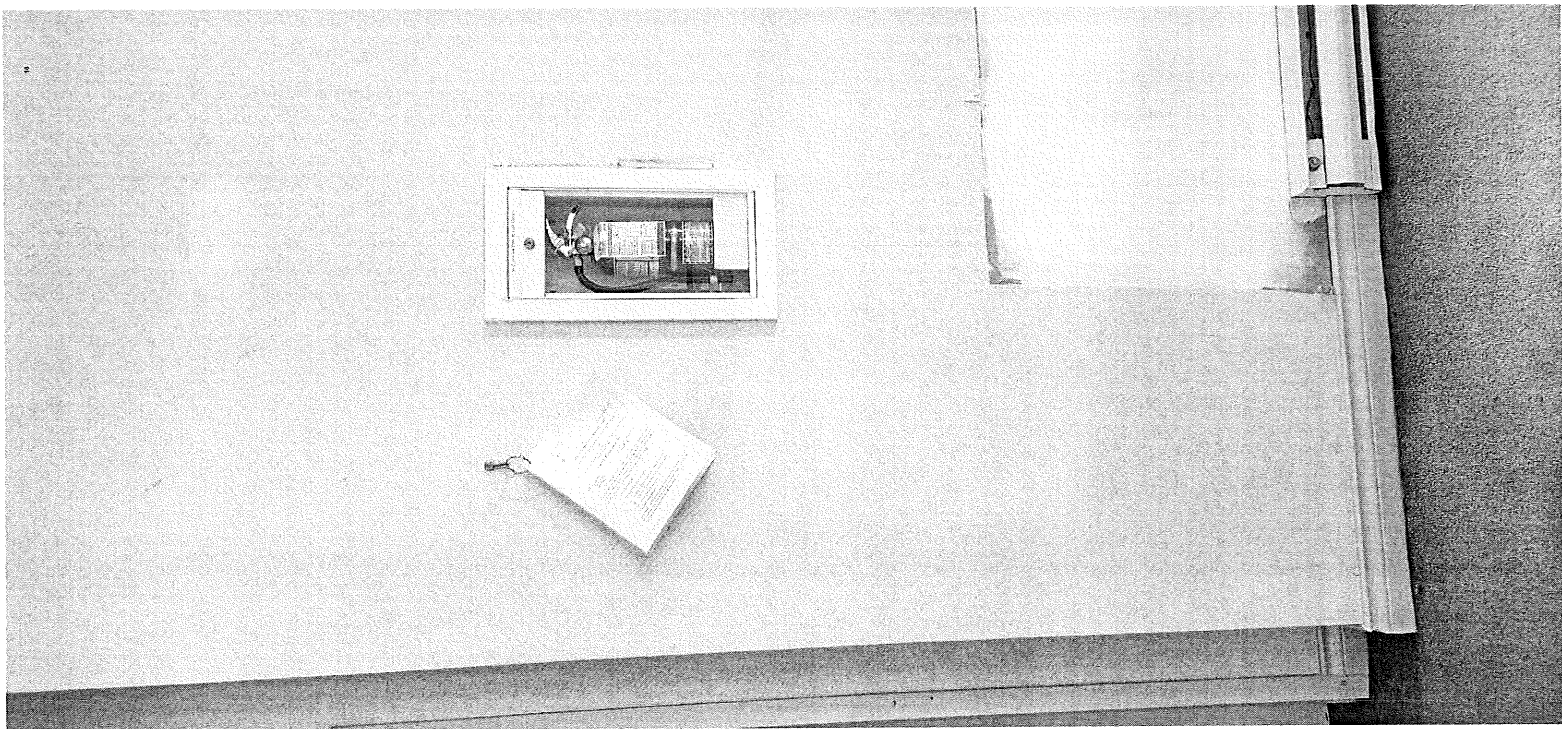
Thanks,  
Jillian

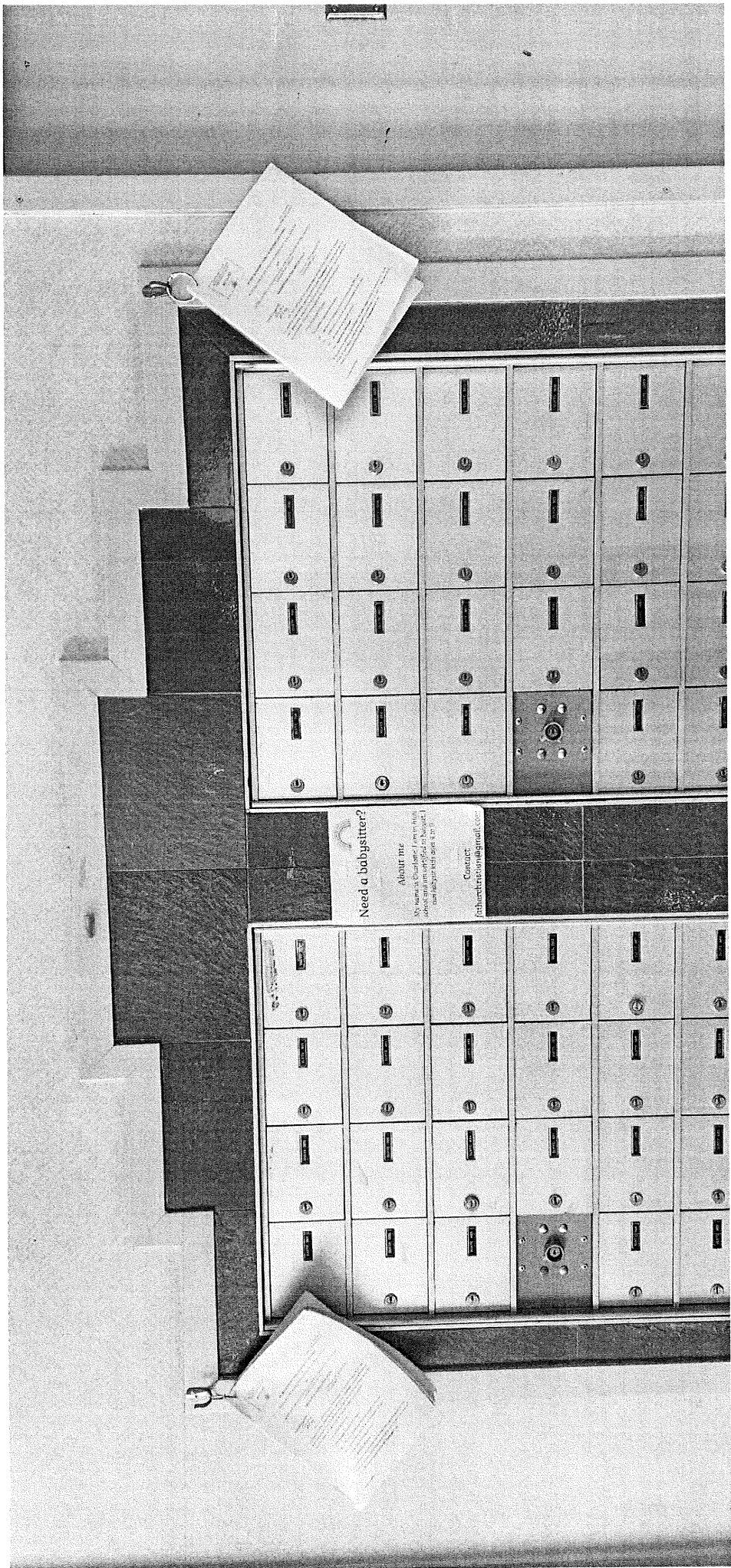
 JILLIAN EPP (she/her) | Associate  
D 604.631.3602 | F 604.669.1620 | E [jepp@lawsonlundell.com](mailto:jepp@lawsonlundell.com)  
LAWSON LUNDELL LLP 1600 - 925 West Georgia Street, Vancouver, BC V6C 3L2  
Vancouver | Calgary | Yellowknife | Kelowna



### Disclaimer

This email and any accompanying attachments contain confidential information that may be subject to solicitor-client privilege and are intended only for the named recipients. If you have received this email in error, please notify the sender and destroy the email. Our e-mail terms of use can be found at <http://www.lawsonlundell.com/disclaimer.html>





**Jillian Epp (3602) - 14Flr**

---


**From:** Kevin Bahng (3226) - 17Flr  
**Sent:** Thursday, November 16, 2023 11:45 AM  
**To:** Jillian Epp (3602) - 14Flr  
**Cc:** Peter Roberts (3158) - 14Flr  
**Subject:** RE: Materials for strata wind-up website (matter #150991)

Hi Jill,  
Sorry for the delay on updating the site. This is done now.

Thanks,

Kevin Bahng | Chief Information Officer  
Lawson Lundell LLP  
D 604.631.9226 | M 778.999.9342 | F 604.641.2800

This is Exhibit "D" referred to in the 2nd affidavit of Ashley Cheng affirmed before me at Vancouver, November 29, 2023.



\_\_\_\_\_  
A Commissioner for taking Affidavits within  
British Columbia.

**From:** Jillian Epp (3602) - 14Flr <jjepp@lawsonlundell.com>  
**Sent:** Wednesday, November 15, 2023 9:58 AM  
**To:** Kevin Bahng (3226) - 17Flr <kbahng@lawsonlundell.com>  
**Cc:** Peter Roberts (3158) - 14Flr <proberts@lawsonlundell.com>  
**Subject:** Materials for strata wind-up website (matter #150991)

Good morning Kevin,

Could you please post the attached materials on [www.joyceplacestrata.com](http://www.joyceplacestrata.com)? These are all Pleadings, except for the Order.

Let me know if you have any questions.

Best,  
Jill

 **JILLIAN EPP** (she/her) | Associate  
D 604.631.3602 | F 604.669.1620 | E [jjepp@lawsonlundell.com](mailto:jjepp@lawsonlundell.com)  
**LAWSON LUNDELL LLP** 1600 - 925 West Georgia Street, Vancouver, BC V6C 3L2  
Vancouver | Calgary | Yellowknife | Kelowna



This is Exhibit "E" referred to in the 2nd affidavit of Ashley Cheng affirmed before me at Vancouver, November 29, 2023.



\_\_\_\_\_  
A Commissioner for taking Affidavits within  
British Columbia.



## Wind-Up and Sale of Joyce Place Strata

---

This website provides information about the wind-up and court ordered sale process of the Joyce Place Strata, Strata Plan LMS 992, with properties located at 3362-3376, 3378, 3380, 3382 and 3384 Vanness Avenue, Vancouver, B.C.

This page is for information purposes only and you should consult your professional adviser if you have any questions or are uncertain as to your rights or obligations.

### Wind-Up Petition

On July 7, 2021, the Owners, Strata Plan LMS 992 (“Joyce Place”) held a special general meeting to consider resolutions (the “Wind-Up Resolutions”) to wind-up Joyce Place and appoint Crowe MacKay & Company Ltd. (the “Liquidator”) as the liquidator of the strata pursuant to section 277 of the Strata Property Act. The Wind-Up Resolutions passed, having received 52 votes in favour, representing 81.9% of the 63 strata units, and 11.5 votes against.

On September 2, 2021, the Owners, Strata Plan LMS 299, commenced a petition in the B.C. Supreme Court seeking an order confirming the Wind-Up Resolutions (the “Wind-Up Petition”). The petition was heard on April 19-20, 2022 before Justice Marzari.

Copies of the Petition, Orders, supporting affidavits and all other material filed with the court are available for download below.

### Current Status

On October 19, 2022, Justice Marzari issued Reasons for Judgment in the Wind-Up Petition. She granted all of the orders sought in the Wind-Up Petition, including confirmation of the wind-up of Joyce Place and confirmation of Crowe MacKay & Company Ltd. as the Liquidator for Joyce Place. A copy of Justice Marzari’s reasons for judgment can be found below.

The appointment of the Liquidator is effective as of October 19, 2022 and the Liquidator now has authority over the affairs of Joyce Place. As a practical matter, the Liquidator effectively takes over the role of the strata council. The Liquidator will continue to employ Mr. Leo Chan of Dwell Property Management as the strata management company. Owners should continue to contact Mr. Chan directly with issues related to Joyce Place at [leo.chan@dwellproperty.ca](mailto:leo.chan@dwellproperty.ca). The Liquidator also intends to continue working alongside with the strata council as it relates to the preservation and protection of Joyce Place and a successful sale of same.



A copy of the entered court order confirming the wind-up of Joyce Place and the confirmation of Crowe MacKay & Company Ltd. as the Liquidator is available [here](#).

Should you have any questions or concerns, below is the contact information for the Liquidator and property manager:

Crowe MacKay & Company Ltd.  
1100-1177 West Hastings Street  
Vancouver, BC V6E 4T5 Attn: Derek Lai  
[joyceplace@crowemackay.ca](mailto:joyceplace@crowemackay.ca)

Dwell Property Management  
Suite 170-4311 Viking Way  
Richmond, BC V6V 2K9  
[Leo.chan@dwelldproperty.ca](mailto:Leo.chan@dwelldproperty.ca)

#### Letters to Owners

1. [Notice to Owners \(November 9, 2022\)](#)
2. [Letter to Owners \(December 7, 2022\)](#)
3. [Letter to Owners \(December 22, 2022\)](#)
4. [Letter to Owners \(January 9, 2023\)](#)
5. [Letter to Owners \(February 6, 2023\)](#)
6. [Letter to Owners \(March 15, 2023\)](#)
7. [Letter to Owners \(May 15, 2023\)](#)
8. [Letter to Owners \(May 29, 2023\)](#)
9. [Letter to Owners \(July 7, 2023\)](#)
10. [Letter to Owners \(July 14, 2023\)](#)

#### Pleadings

1. [Petition, filed September 2, 2021](#)
2. [Affidavit #1 of B. Muk, made September 1, 2021](#)
3. [Affidavit #1 of H. Buck, made September 22, 2021](#)
4. [Notice of Application, filed October 6, 2021](#)
5. [Affidavit #1 of G.S. Hamilton, made October 6, 2021](#)
6. [Response to Petition \(Liquidator\), filed October 27, 2021](#)
7. [Affidavit #1 of D. Lai, made October 26, 2021](#)
8. [Affidavit #1 of V. Hsu, made November 1, 2021](#)
9. [Response to Petition \(owner respondents\), filed November 29, 2021](#)
10. [Affidavit #1 of A. Sarab, made November 23, 2021](#)
11. [Response to Petition \(TD\), filed November 26, 2021](#)
12. [Affidavit #1 of K. Chan, made November 26, 2021](#)

13. [Affidavit #1 of C. Wang, made November 26, 2021](#)
14. [Affidavit #1 of D. Brackstone, made November 29, 2021](#)
15. [Affidavit #1 of P. Hui, made December 6, 2021](#)
16. [Affidavit #1 of M. Khodabakhsh, made December 6, 2021](#)
17. [Response to Petition \(First National Financial\), filed December 15, 2021](#)
18. [Amended Response to Petition \(commercial owners\), filed March 7, 2022](#)
19. [Affidavit #1 of J. Yngson, made March 7, 2022](#)
20. [Affidavit #2 of V. Hsu, made March 17, 2022](#)
21. [Affidavit #2 of B. Muk, made March 25, 2022](#)
22. [Affidavit #1 of C. Simpson, made March 28, 2022](#)
23. [Affidavit #2 of K. Chan, made March 28, 2022](#)
24. [Affidavit #1 of P. Law, made March 29, 2022](#)
25. [Notice of Application, filed April 4, 2022](#)
26. [Response to Petition \(Intracorp Vanness Limited Partnership\), filed April 7, 2022](#)
27. [Affidavit #1 of T. Sandhu, made April 7, 2022](#)
28. [Response to Petition \(Blueshore\), filed April 11, 2022](#)
29. [Affidavit #1 of L. Steel, made April 11, 2022](#)
30. [Application Response \(Owners of Strata Plan LMS992\), filed April 12, 2022](#)
31. [Affidavit #3 of V. Hsu, made April 12, 2022](#)
32. [Reasons for Judgment, dated October 19, 2022](#)
33. [Notice of Application, filed November 14, 2023](#)
34. [Affidavit #2 of Derek Lai, sworn November 8, 2023, filed November 14, 2023](#)
35. [Affidavit #1 of Ashley Cheng, made November 9, 2023, filed November 14, 2023](#)

### Orders

1. [Order of Master Muir, made October 8, 2021](#)
2. [Order of Justice Marzari, made October 19, 2022](#)
3. [Order of Justice Riley, made November 2023](#)

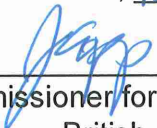
### Court Forms

1. [Application Response](#)



Suite 1600 Cathedral Place  
925 West Georgia Street  
Vancouver, BC  
Canada V5C 3L2  
T: 604.685.3456

This is Exhibit "F" referred to in the 2nd affidavit of Ashley Cheng affirmed before me at Vancouver, November 29, 2023.

  
A Commissioner for taking Affidavits within  
British Columbia.

November 17, 2023

BY REGULAR MAIL

The Bank of Nova Scotia  
#9 – 4299 Kingsway  
Burnaby, BC V5H 1Z5

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #3 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

You can access more information and materials filed with the court at [www.joyceplacestrata.com](http://www.joyceplacestrata.com).

You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp

JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com



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

November 17, 2023

BY REGULAR MAIL

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com

Canadian Imperial Bank of Commerce  
PO Box 115 Commerce Court Postal Stn.  
Toronto, ON M5L 1E5

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lots #4, #42 and #57 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

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You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.



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

November 17, 2023

BY REGULAR MAIL

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com

Canadian Imperial Bank of Commerce  
601 – 1 No. 3 Road  
Richmond, BC V6Y 2B2

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as “Joyce Place”. We understand you are a registered chargeholder on strata lot #5 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

You can access more information and materials filed with the court at [www.joyceplacestrata.com](http://www.joyceplacestrata.com).

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Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp

JEE  
Encs.



Suite 1609 Cathedral Place  
925 West Georgia Street  
Vancouver, BC  
Canada V6C 3L2  
T: 604.685.3456

November 17, 2023

BY REGULAR MAIL

CIBC Mortgages Inc.  
5th Floor, 400 Burrard Street  
Vancouver, BC V6C 3A6

Dear Sirs/Mesdames:

**Re:** *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956*

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #5 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

You can access more information and materials filed with the court at [www.joyceplacestrata.com](http://www.joyceplacestrata.com).

You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp

JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com



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

November 17, 2023

BY REGULAR MAIL

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com

Canadian Imperial Bank of Commerce  
100 University Avenue, 3rd Floor  
Toronto, ON M5J 2X4

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #7 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

You can access more information and materials filed with the court at [www.joyceplacestrata.com](http://www.joyceplacestrata.com).

You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp

JEE  
Encs.



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

November 17, 2023

BY REGULAR MAIL

Vancouver City Savings Credit Union  
3305 Kingsway  
Vancouver, BC V5R 5K6

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #13 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

You can access more information and materials filed with the court at [www.joyceplacestrata.com](http://www.joyceplacestrata.com).

You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com





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

November 17, 2023

BY REGULAR MAIL

ING Bank of Canada  
3389 Steeles Avenue East 6th  
Toronto, ON M2H 0A1

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #17 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

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You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com



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

November 17, 2023

BY REGULAR MAIL

Royal Bank of Canada  
180 Wellington Street West  
Toronto, ON M5J 1J1

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lots #18, #23, #47, and #48 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

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Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com

November 17, 2023

BY REGULAR MAIL

Canadian Imperial Bank of Commerce  
1427 Kingsway  
Vancouver, BC V5N 2R6

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #19 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

You can access more information and materials filed with the court at [www.joyceplacestrata.com](http://www.joyceplacestrata.com).

You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP



Jillian Epp  
JEE  
Encs.



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

November 17, 2023

BY REGULAR MAIL

Royal Bank of Canada  
10 York Mills Road, 3rd Floor  
Toronto, ON M2P 0A2

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lots #20, #29, and #52 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

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You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
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D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com



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

November 17, 2023

BY REGULAR MAIL

HSBC Bank Canada  
11th Floor, 401 West Georgia Street  
Vancouver, BC V6B 5A1

Dear Sirs/Mesdames:

**Re:** *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956*

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #21 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

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You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com



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

November 17, 2023

BY REGULAR MAIL

Vancouver City Savings Credit Union  
188 East Pender Street  
Vancouver, BC V6A 1T3

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #34 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

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Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com



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

November 17, 2023

BY REGULAR MAIL

CIBC Mortgages Inc.  
400 Burrard Street, 5th Floor  
Vancouver, BC V6C 3A6

Dear Sirs/Mesdames:

**Re:** *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956*

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #35 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

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Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com



Suite 1609 Cathedral Place  
925 West Georgia Street  
Vancouver, BC  
Canada V6C 3L2  
T: 604.685.3456

November 17, 2023

BY REGULAR MAIL

Scotia Mortgage Corporation  
6498 Fraser Street  
Vancouver, BC V5W 3A5

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #36 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

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2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

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Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com





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

November 17, 2023

BY REGULAR MAIL

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com

Canadian Imperial Bank of Commerce  
4101 Hastings Street  
Burnaby, BC V5C 2J3

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #39 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

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Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.



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

November 17, 2023

BY REGULAR MAIL

Scotia Mortgage Corporation  
1 West Broadway  
Vancouver, BC V5Y 1P1

Dear Sirs/Mesdames:

**Re:** *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956*

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #40 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

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You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com



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

November 17, 2023

BY REGULAR MAIL

CIBC Mortgages Inc.  
1745 West 8th Avenue – Level B1  
Vancouver, BC V6J 4T3

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as “Joyce Place”. We understand you are a registered chargeholder on strata lot #43 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

You can access more information and materials filed with the court at [www.joyceplacestrata.com](http://www.joyceplacestrata.com).

You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com



Suite 1609 Cathedral Place  
925 West Georgia Street  
Vancouver, BC  
Canada V6C 3L2  
T: 604.685.3456

November 17, 2023

BY REGULAR MAIL

Canadian Imperial Bank of Commerce  
501 Main Street  
Vancouver, BC V6A 2V2

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #49 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

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You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com



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

November 17, 2023

BY REGULAR MAIL

The Bank of Nova Scotia  
101 – 268 Keefer Street  
Vancouver, BC V6A 1X5

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as “Joyce Place”. We understand you are a registered chargeholder on strata lot #53 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

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You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

A handwritten signature in black ink, appearing to read 'J Epp', written over a light blue horizontal line.

Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com



Suite 1600 Cathedral Place  
925 West Georgia Street  
Vancouver, BC  
Canada V5C 3L2  
T: 604.685.3456

November 17, 2023

BY REGULAR MAIL

National Bank of Canada  
500 Place D'Armes, 22nd Floor  
Montreal, QC H2Y 2W3

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #56 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

You can access more information and materials filed with the court at [www.joyceplacestrata.com](http://www.joyceplacestrata.com).

You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.

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D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com



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

November 17, 2023

BY REGULAR MAIL

Vancouver City Savings Credit Union  
5594 Cambie Street  
Vancouver, BC V5Z 3Y5

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #58 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

You can access more information and materials filed with the court at [www.joyceplacestrata.com](http://www.joyceplacestrata.com).

You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com



Suite 1600 Cathedral Place  
925 West Georgia Street  
Vancouver, BC  
Canada V5C 3L2  
T: 604.685.3456

November 17, 2023

BY REGULAR MAIL

The Bank of Nova Scotia  
1 West Broadway  
Vancouver, BC V5Y 1P1

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #62 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

You can access more information and materials filed with the court at [www.joyceplacestrata.com](http://www.joyceplacestrata.com).

You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com





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

November 17, 2023

BY REGULAR MAIL

Celia Chartier Chancy  
2965 West 36th Avenue  
Vancouver, BC V6N 2R2

Dear Sirs/Mesdames:

**Re: *In the Matter of the Application for the Wind-Up of The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956***

We are counsel to Crowe MacKay & Company Ltd., the liquidator of The Owners, Strata Plan LMS-992 (the **Liquidator**) in the strata wind-up of the strata development commonly referred to as "Joyce Place". We understand you are a registered chargeholder on strata lot #63 in Joyce Place.

On **Monday, December 4, 2023, at 9:45 a.m.** the Liquidator intends to bring an application to the BC Supreme Court in the strata wind-up proceeding. We enclose for service upon you, in accordance with the Order for substituted service by Justice Riley issued on November, 14, 2023, copies of:

1. The Information Notice to chargeholders of strata units in Joyce Place; and
2. The Order for substituted service made by Justice Riley, entered November 14, 2023.

You can access more information and materials filed with the court at [www.joyceplacestrata.com](http://www.joyceplacestrata.com).

You are entitled to attend this hearing to make your views known. If you plan to do so, you must file with the court a Response to Application setting out your position and provide a copy to our office. Your Response to Application should be filed with the court and provided to us by **November 28, 2023**. A form of Response to Application is available on the website.

Yours very truly,

LAWSON LUNDELL LLP

Jillian Epp  
JEE  
Encs.

Jillian Epp  
D: 604.631.3602  
F: 604.669.1620  
jepp@lawsonlundell.com

**Jillian Epp (3602) - 14Flr**

**From:** Peter Roberts (3158) - 14Flr <proberts@lawsonlundell.com>  
**Sent:** Monday, November 20, 2023 12:51 PM  
**To:** 'charm.1guillerganhs@gmail.com'  
**Cc:** Ashley Cheng (3316) - 14Flr  
**Subject:** RE: Joyce Place - The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956

Dear Cynthia,

I am sorry to hear about your accident and hope you are on the road to recovery. You will need to decide whether the current court application by the Liquidator is important as we do not know your circumstances. The application and affidavit evidence can be found at the website: [www.joyceplacestrata.com](http://www.joyceplacestrata.com)

In short, the Liquidator is applying to court to approve the Liquidator's decision to sign an agreement with Intracorp. to extend Intracorp's subject removal date for the Purchase and Seal Agreement (PSA) by four months.

If you wish to express a view on whether or not the PSA extension should be approved by the court or not, you can provide your thoughts in a letter or email and we will ensure they are put before the court when it considers this issue.

Regards,

Peter J. Roberts, K.C. (he/him) | Partner  
 Lawson Lundell LLP  
 D 604.631.9158 | F 604.641.4400

**From:** Cynthia Guillergan <charm.1guillerganhs@gmail.com>  
**Sent:** Saturday, November 18, 2023 2:39 PM  
**To:** Ashley Cheng (3316) - 14Flr <acheng@lawsonlundell.com>  
**Subject:** Re: Joyce Place - The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956

[THIS MESSAGE ORIGINATED FROM OUTSIDE OUR FIRM]

Hi Ms. Ashley,

I met with a car accident (NFW-cannot even focus on reading) here in Hamilton, not around in Vancouver. Anything important in ASAP should I pay attention to your email?

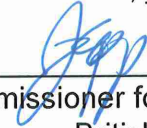
Thanks and regards.

Cynthia

On Fri, Nov 17, 2023 at 12:25 PM Ashley Cheng <acheng@lawsonlundell.com> wrote:

Good morning,

This is Exhibit "G" referred to in the 2nd affidavit of Ashley Cheng affirmed before me at Vancouver, November 29, 2023.

  
 A Commissioner for taking Affidavits within  
 British Columbia.

Please see attached correspondence and enclosures from Ms. Epp dated November 16, 2023.

Kind regards,



**ASHLEY CHENG** | Legal Assistant  
D 604.408.5316 | F 604.669.1620 | E [acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)  
**LAWSON LUNDELL LLP** 1600 - 925 West Georgia Street, Vancouver, BC V6C 3L2  
Vancouver | Calgary | Yellowknife | Kelowna

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**Jillian Epp (3602) - 14Flr**

**From:** Peter Leung <petercleung@yahoo.com>  
**Sent:** Sunday, November 19, 2023 2:19 PM  
**To:** Ashley Cheng (3316) - 14Flr  
**Subject:** Re: Joyce Place - The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956

[THIS MESSAGE ORIGINATED FROM OUTSIDE OUR FIRM]

Dear Ashley Cheng,

Good day.

1. I am about 80 years old person and retired for over 15 years. My daily expense is counted on government income supplement. For the last several years I spent a lot of money on building repaired, insurance.. etc. and as a result, all my savings are gone. I cannot afford for any further repair charge incurred. Unfortunately, our townhouses are badly damaged and needed to be repaired. It will cost a lot of money then.
2. I want to make a request in front of the judge for grant permission to let Intracorp/the developer has a few months more to get permission from the City Council to rezone the land. However, my limited English knowledge and poor power of speaking do not allow me to do so.
3. Would you be kind enough to help us to request the Judge to grant the permission to extend the period further to let Intracorp/the developer have enough time to get the rezoning permission.

Many thanks and best regards

Leung Chuk Chuen  
 505-3380 Vanness Ave. Vancouver  
 tel. 604-430-3798  
 2023/11/19

On Saturday, November 18, 2023 at 12:27:09 p.m. EST, Peter Leung <petercleung@yahoo.com> wrote:

Hi Ashley Cheng,

Good morning.

After reading Jillian Epp's message dated November 16, 2023, I am confused and surprised as to why I was singled out and why such a letter was sent to me.


I have never requested any person/party to let me attend the court about this matter. I believe it is a misunderstanding.

Would you please clarify it ASAP?

Many thanks and best regards

Chuk Chuen Leung  
 505-3380 Vanness Ave. Vancouver  
 2023/11/18

This is Exhibit "H" referred to in the 2nd affidavit of Ashley Cheng affirmed before me at Vancouver, November 29, 2023.

  
 A Commissioner for taking Affidavits within  
 British Columbia.

On Friday, November 17, 2023 at 06:23:45 p.m. EST, Ashley Cheng <acheng@lawsonlundell.com> wrote:

Good afternoon,

Please see attached correspondence and enclosures from Ms. Epp dated November 16, 2023.

Kind regards,



**ASHLEY CHENG** | Legal Assistant  
D 604.408.5316 | F 604.669.1620 | E acheng@lawsonlundell.com  
**LAWSON LUNDELL LLP** 1600 - 925 West Georgia Street, Vancouver, BC V6C 3L2  
Vancouver | Calgary | Yellowknife | Kelowna

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**Jillian Epp (3602) - 14Flr**

---

**From:** Peter <peter@kasselpainting.com>  
**Sent:** Sunday, November 19, 2023 1:10 PM  
**To:** Peter Roberts (3158) - 14Flr  
**Cc:** Ashley Cheng (3316) - 14Flr  
**Subject:** Re: Joyce Place - The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956  
**Attachments:** IMG\_20231119\_0001.pdf; Extension Support Letter.pdf

[THIS MESSAGE ORIGINATED FROM OUTSIDE OUR FIRM]

---

Dear Mr Roberts,

I posted a copy of my support letter (see email of 17 Nov) in the lobby of our building, as an example of what one *might* write in support of the extension.

Another owner, name unknown to me, chose to start a campaign based on this posting, stating that many of the Chinese owners would not be able to compose a letter in English.

The result was the attached 'petition' in support of the extension, giving their names, suite numbers and email addresses.

Hopefully this can be submitted as an exhibit in support of the extension. Please let me know if you have any questions.

Best, Peter Byrne

**Kassel Painting Ltd**  
**Peter Byrne - Owner/Operator**

*Certified Member: **Shell Busey's Referral Network***  
*Verified Member: **HomeStars Home Improvements***

1101 - 3380 Vanness Avenue  
 Vancouver BC V5R 6B8  
 T: 604 618 0821 E: [peter@kasselpainting.com](mailto:peter@kasselpainting.com)

Web: [kasselpainting.com](http://kasselpainting.com)


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**Video:** [askshell.com/portfolio-item/kassel-painting/](http://askshell.com/portfolio-item/kassel-painting/)

**Facebook:** [facebook.com/KasselPainting/](https://facebook.com/KasselPainting/)

"The bitterness of poor quality remains long after the sweetness of low price is forgotten" – Benjamin Franklin

This is Exhibit "I" referred to in the 2nd affidavit of Ashley Cheng affirmed before me at Vancouver, November 29, 2023.

  
 A Commissioner for taking Affidavits within  
 British Columbia.

On Nov 17, 2023, at 5:15 PM, Peter <[peter@kasselpainting.com](mailto:peter@kasselpainting.com)> wrote:

Dear Mr Roberts,

Please find attached letter of support for the extension.

Best, Peter Byrne

**Kassel Painting Ltd**  
**Peter Byrne - Owner/Operator**

*Certified Member: **Shell Busey's Referral Network***  
*Verified Member: **HomeStars Home Improvements***

1101 - 3380 Vanness Avenue  
Vancouver BC V5R 6B8  
T: 604 618 0821 E: [peter@kasselpainting.com](mailto:peter@kasselpainting.com)

Web: [kasselpainting.com](http://kasselpainting.com)

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Facebook: [facebook.com/KasselPainting/](https://facebook.com/KasselPainting/)

"The bitterness of poor quality remains  
long after the sweetness of low price is forgotten" – Benjamin Franklin

On Nov 17, 2023, at 4:14 PM, Peter Roberts <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)> wrote:

Yes. We will make sure it is before the court.

Peter J. Roberts, K.C. (he/him) | Partner  
Lawson Lundell LLP  
D 604.631.9158 | F 604.641.4400

---

**From:** Peter <[peter@kasselpainting.com](mailto:peter@kasselpainting.com)>  
**Sent:** Friday, November 17, 2023 4:13 PM  
**To:** Peter Roberts (3158) - 14Flr <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)>  
**Subject:** Re: Joyce Place - The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956

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

---

This would simplify my life considerably!

Should I forward the letter to you or to Ashley?

Best, Peter

**Kassel Painting Ltd**  
**Peter Byrne - Owner/Operator**

*Certified Member: **Shell Busey's Referral Network***  
*Verified Member: **HomeStars Home Improvements***

1101 - 3380 Vanness Avenue  
Vancouver BC V5R 6B8  
T: 604 618 0821 E: [peter@kasselpainting.com](mailto:peter@kasselpainting.com)

Web: [kasselpainting.com](http://kasselpainting.com)

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Facebook: [facebook.com/KasselPainting/](https://facebook.com/KasselPainting/)

"The bitterness of poor quality remains long after the sweetness of low price is forgotten" – Benjamin Franklin

On Nov 17, 2023, at 4:10 PM, Peter Roberts <[proberts@lawsonlundell.com](mailto:proberts@lawsonlundell.com)> wrote:

Hello Mr. Byrne,

You have my sympathies about the apparent complexity of the court forms. As we are not your lawyers, we cannot really tell you how to fill out the form or what you should say. However, if you would rather simply write a letter or note setting out your position, then we will ensure that your letter is put before the court on this application, whatever it says. Would that help?

Regards  
Peter J. Roberts, K.C. (he/him) | Partner  
Lawson Lundell LLP  
D 604.631.9158 | F 604.641.4400

---

**From:** Peter <[peter@kasselpainting.com](mailto:peter@kasselpainting.com)>  
**Sent:** Friday, November 17, 2023 2:20 PM  
**To:** Ashley Cheng (3316) - 14Flr <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>  
**Subject:** Re: Joyce Place - The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956

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

---

Thanks Ashley, having reviewed the form I don't think I am competent to fill it in or respond in support, without a bit more education in the legal.

Therefore, unfortunately, I will be unable to respond in support.

Best, Peter

PS: Possibly, as the lawyer representing the strata, you could provide me guidance or a form letter which requires only a signature or some simple details, clearly explained, for the layman to understand. - P

**Kassel Painting Ltd**  
**Peter Byrne - Owner/Operator**

*Certified Member: **Shell Busey's Referral Network***  
*Verified Member: **HomeStars Home Improvements***

1101 - 3380 Vanness Avenue  
Vancouver BC V5R 6B8  
T: 604 618 0821  
E: [peter@kasselpainting.com](mailto:peter@kasselpainting.com)

Web: [kasselpainting.com](http://kasselpainting.com)

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"The bitterness of poor quality remains long after the sweetness of low price is forgotten" – Benjamin Franklin

On Nov 17, 2023, at 1:37 PM, Ashley Cheng  
<[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)> wrote:

Hi Mr. Byrne,

Thanks for your email.

The website has been updated and attached a word document for your reference.

Kind regards,

Ashley Cheng | Legal Assistant  
Lawson Lundell LLP  
D 604.408.5316 | F 604.669.1620

---

**From:** Peter <[peter@kasselpainting.com](mailto:peter@kasselpainting.com)>  
**Sent:** Friday, November 17, 2023 12:16 PM  
**To:** Ashley Cheng (3316) - 14Flr  
<[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>  
**Subject:** Re: Joyce Place - The Owners, Strata Plan LMS-992, SCBC Vancouver Registry Action No. S-217956

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

---

I did not see a link in your email to Response to Application.  
On the [joyceplacestrata.com](http://joyceplacestrata.com) page the very last link on the page under Court orders form 1 is the link below. It is broken.

Please advise of where to find the correct link.

Best, PETER BYRNE

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**Kassel Painting Ltd**  
**Peter Byrne - Owner/Operator**

*Certified Member: **Shell Busey's Referral Network***  
*Verified Member: **HomeStars Home Improvements***

1101 - 3380 Vanness Avenue  
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Facebook: [facebook.com/KasselPainting/](https://facebook.com/KasselPainting/)

"The bitterness of poor quality remains  
long after the sweetness of low price is forgotten" – Benjamin Franklin

On Nov 17, 2023, at 10:03 AM, Ashley  
Cheng <[acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)>  
wrote:

Good morning,

Please see attached correspondence  
and enclosures from Ms. Epp dated  
November 16, 2023.

Kind regards,



Ashley Cheng | Legal Assistant  
D 604.408.5316 | F 604.669.1620 | E [acheng@lawsonlundell.com](mailto:acheng@lawsonlundell.com)  
Lawson Lundell LLP 1600 - 925 West Georgia Street, Vancouver, BC V6C 3L2  
Vancouver | Calgary | Yellowknife | Kelowna

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at [http://www.lawsonlundell.com/disclaimer  
.html](http://www.lawsonlundell.com/disclaimer.html)

Peter Byrne  
1101-3380 Vanness Avenue | Vancouver | BC | Canada | V5R 6B8  
[peterbyrne9121@gmail.com](mailto:peterbyrne9121@gmail.com)

17 November 2023

To: The Court

Letter in Support of:  
THE MATTER OF THE APPLICATION FOR THE WIND-UP OF THE OWNERS,  
STRATA PLAN LMS 992

Your Honours,

Having endured the financial hardships and other mental stresses of living in this Ship of Fools, aka LMS 992, for 15 years, I can tell you that I for one, will be very relieved and do anxiously await the day that we can successfully liquidate this property, and to wit; take the money and run.

We only have one working elevator in a twelve-story building. Sometimes it breaks down and our senior citizen residents either wait or have to walk up many flights of steps. The townhouses are falling apart. Some units have leaks.

Alternately we are faced with vast levies beyond our means, millions of dollars we don't have. I have personally paid over \$70,000 for repair levies and the building is still no good.

Whatever it takes for us to work in cooperation with the developer to bring this matter to a close and all walk away with the best we can get, is the subject of my dreams on a nightly basis.

I hope that you will provide the extension need to permit our existing deal to continue a little longer so that we do not face the gruesome task of starting over to make a new deal, adding even more years of insufferable conditions.

Respectfully,

A handwritten signature in black ink, appearing to be 'Peter Byrne', written in a cursive style.

Peter Byrne

Name

EMAIL

ADDRESS

TAK IN LAO

janet.chiang@hotmail.ca

# 501-3380 VANNESS AVE  
VANCOUVER BC V5R 6B8

Douglas and  
Teresa Dirks

mini2015.td@gmail.com

#1004-3380 Vanness  
Vancouver, BC V5R 6B8

Andrew & Pearl Cheung

pearlkaocheung@hotmail.com

#1001-3380 Vanness Ave, Van BC V5R

Leon Zhu

Yuki123T2@yahoo.com

# 3372 Vanness Ave, Van BC V5R 5F

Ricky Kwok Wai Hon

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#803-3380 Vanness Ave, Van BC V5R 6

Mila Savitski

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#903-3380 " " "

BENJAMIN PERALTA

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Carlos Cordeiro

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PEPPIE AQUINO

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LEUNG CHUK CHUEN

~~PER~~ PETERCC LEUNG @Yahoo.com

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Amanda Wu

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502-3380 Vanness " "

HO YUUK CHING

no email

804-3380 Vanness Ave " "

Noel Banta

~~no email~~ / mcel.banta@yahoo.com

905-2380 Vanness Ave

Reynaldo Marayag

reymarayag@gmail.com

802-3380 Vanness Ave

Dang Ha

no email

1002-3380 Vanness Ave

Xue Ying Yang

AI GUO XU

emiiyang168@hotmail.com

#602-330 Vanness Ave  
Van BC V5R 6B8

# 602

XUE YING YANG

AI GUO XU

emiiyang168@hotmail.com



**Jillian Epp (3602) - 14Flr**

---

**From:** Carlos Cordeiro <cmira18@hotmail.com>  
**Sent:** Tuesday, November 21, 2023 2:44 PM  
**To:** Ashley Cheng (3316) - 14Flr  
**Subject:** Letter in Support - Strata Plan LMS 992 Wind-up

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

---

Your Honour/s,

I am an Owner and lived in the building at Joyce Place, STRATA PLAN LMS 992 for the past 25 years.

Over the years our building has gradually deteriorated and the necessary improvement haven't been implemented and at this point I feel the only hope is for us to sell the Building and dissolve the Strata. The last few years has been very mentally and financially stressful.

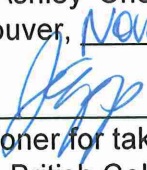
I have paid over \$70,000.00 for levies and repairs with no apparent improvement to the building. At this point, only one elevator works making very difficult at times for everyone specially the elderly.

I am hoping that you will grant the extension in order to give the Developer the requested time for City approvals. If this extension is not granted we will have to start all over again, incurring in more expenses that most of us could not afford.

Respectfully,

Carlos Cordeiro  
#704-3380 Vanness Ave.

This is Exhibit "J" referred to in the 2nd affidavit of Ashley Cheng affirmed before me at Vancouver, November 29, 2023.



---

A Commissioner for taking Affidavits within British Columbia.

**Jillian Epp (3602) - 14Flr**

---

**From:** Lisa Frey (3139) - 17Flr  
**Sent:** Sunday, November 5, 2023 2:00 PM  
**Subject:** LMS992 - Joyce Place - Information Meeting - Notes  
**Attachments:** LMS 992 - Joyce Place - Oct 30 Info Meeting Notes.pdf

Dear Joyce Place Owner

Due to a privacy request, we elected not to record the information meeting on Oct 30. However, detailed notes of the meeting are attached, along with the slides presented by Intracorp.

Please let us know if you have questions or concerns.

Thanks,  
Lisa

 LISA FREY (she/her) | Associate  
D 604.631.9139 | F 604.669.1620 | E lfrey@lawsonlundell.com  
LAWSON LUNDELL LLP 1600 - 925 West Georgia Street, Vancouver, BC V6C 3L2  
Vancouver | Calgary | Yellowknife | Kelowna



This is Exhibit "K" referred to in the 2nd affidavit of Ashley Cheng affirmed before me at Vancouver, November 29, 2023.

  
A Commissioner for taking Affidavits within  
British Columbia.

**THE OWNERS, STRATA PLAN LMS992 - JOYCE PLACE****INFORMATION MEETING**

OCTOBER 30, 2023 – 7PM via ZOOM

**Attendees:** Derek Lai/Tetsu Takagaki (Crowe MacKay & Company Ltd.); Hart Buck/Jennifer Darling (Colliers); Leo Chan (Dwell Property Management); Peter Roberts/Lisa Frey (Lawson Lundell LLP); Strata Owners

**Guests:** Farouk Babul (Intracorp Group); Sophie Perndl (Pooni Group)

**Agenda:**

- A. Brief Update (Lisa Frey)
- B. Presentation by Intracorp and Pooni Group (Farouk Babul/Sophie Perndl)
- C. Internal Strata Discussion (Questions for the Lawson Legal Team or Liquidator)

**Summary:****A. Brief Update**

1. As indicated by letter to owners from the Liquidator dated August 25, 2023, the purchase agreement with Intracorp is still subject to a condition regarding City of Vancouver rezoning of the strata's underlying lands.
2. The date to remove this condition under the existing purchase agreement is January 2024.
3. A presentation was made by the Intracorp and Pooni Group, Intracorp's urban planner consultants, regarding rezoning of the site to the City of Vancouver "Urban Design Panel" in July 2023, but it is not expected that they will provide a formal response until sometime during the first quarter of 2024.
4. Therefore, Intracorp asked for a 4 month extension of this rezoning condition and closing to allow time to receive a formal response from the City.
5. An extension agreement was negotiated and signed by the Liquidator but will still require court approval.
6. The extension agreement includes \$50,000 non-refundable fee which can be used for covering the costs of the meeting/extension and Court approval process.
7. Lawson Lundell is in the process of working on this court application.
8. If the extension is approved by the Court, the strata corporation will also be paid a \$300,000 extension fee/increased deposit by Intracorp. A portion of this fee is non-refundable, which the strata may use to cover the costs of the extension (e.g. insurance costs during the additional four month period).

9. If the extension agreement is not approved, then the deal will end.

#### **B. Intracorp Presentation**

1. Intracorp's VP Development and lead planning consultant presented on the proposal and updated owners with respect to its status. A copy of their slide deck is attached as Schedule "A".
2. They indicated that the biggest factor in getting the rezoning approved (leading to the sale going forward) would be the proposal achieving sufficient levels of public support.
3. They encouraged owners to submit individual letters of support to the City, and if at all possible to attend and speak in favour of the project at the public consultation hearing, which is anticipated to occur in late January 2024.
4. A number of owners commented as to the quality of the proposal and asked how to show their support. More information will be provided by Pooni Group to owners about how to do so, once the date for the public consultation hearing has been set. The date of the public hearing is typically released one month in advance of the hearing date.
5. When asked about the likelihood of success of the rezoning being approved by the City, Intracorp indicated that they would not have expended the time and expense to date if they were not relatively confident about their chances of success.
6. When asked what would happen if the panel does not approve the proposal, they indicated then it would be "back to square one" in that a whole new application needs to be submitted.

#### **C. Internal Strata Discussion** (*Following the presentation, Intracorp/Pooni left the meeting*)

1. Lawson Lundell provided an update to do with the next steps in the Court process. An application would be made and all owners would be served with notice. There is no need to attend the Court hearing, but owners can if they wish. Sending an email in support of the application to Lawson Lundell would be helpful, but if owners have limited time, the more important letters of support to focus on are to the City in support of the project.
2. An owner raised that the uncertainty has been difficult and that they would now be forced to renew their mortgage for a short period of time. It was acknowledged that while an extension is not ideal, it would hopefully allow the current deal to move forward. It was suggested that owners who may have mortgages which are expiring in the upcoming months could reach out to their mortgage brokers about how the process of "porting" a mortgage, as it might be a possible option for some.
3. An owner asked whether the extension deposit/fee would be sufficient to cover costs over the extension period. The Liquidator advised that there was a lot of back and forth with respect to the proposed extension and he believed the extension deposit/fee was reasonable

given the circumstances in order to preserve the deal. The Liquidator believed that the extension agreement where it sits today is much more improved in favor of the strata than where it was when the extension was first being considered. Colliers also advised that at one point the extension deposit/fee included terms that seemed to create more of an administrative burden and that has since been changed. The Liquidator advised that a portion of the extension deposit/fee can be used to defray certain costs such as insurance.

4. Information and updates will be posted on the Joyce Place website.



INTRACORP

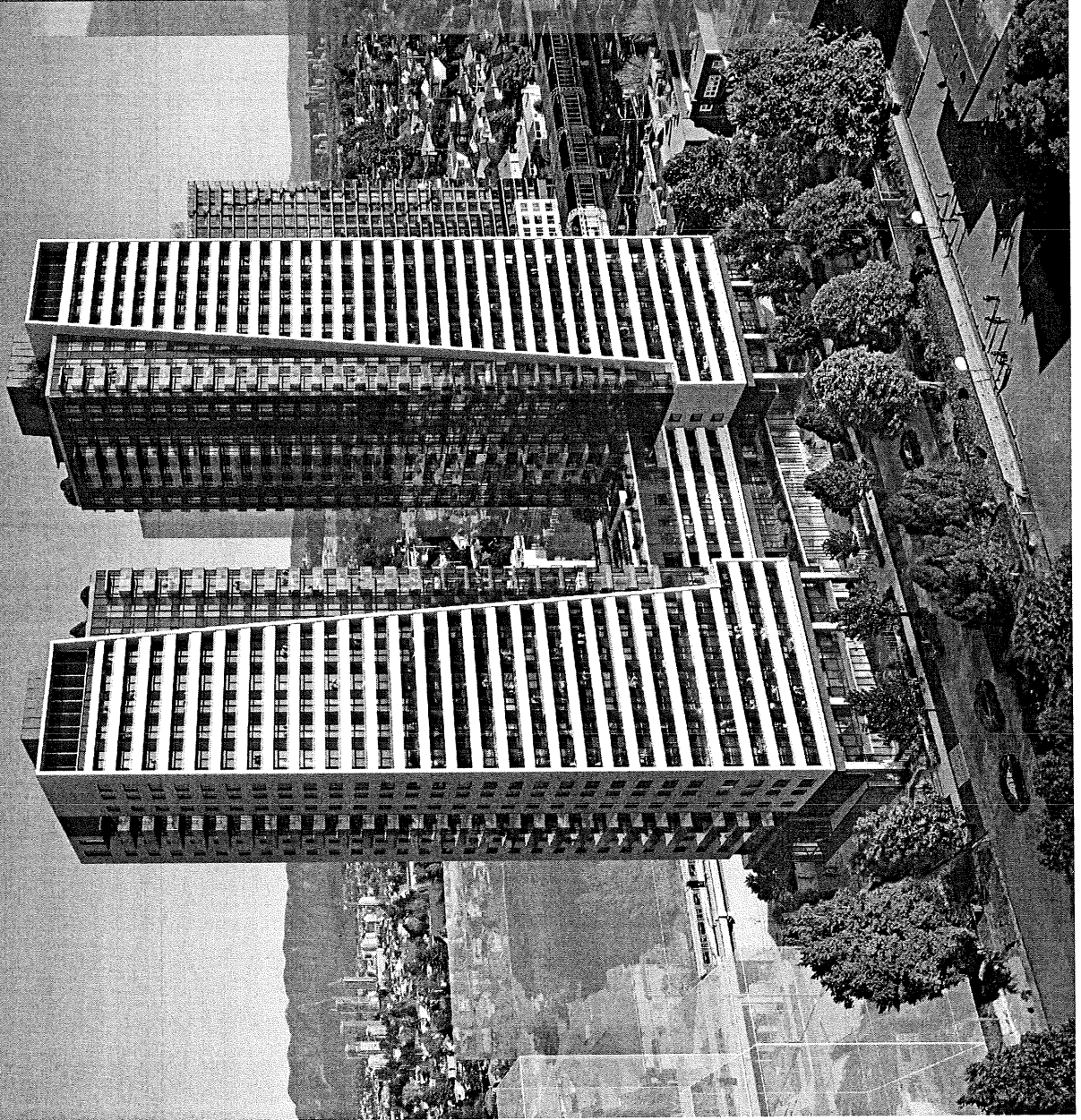
Building the Extraordinary

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REZONING APPLICATION

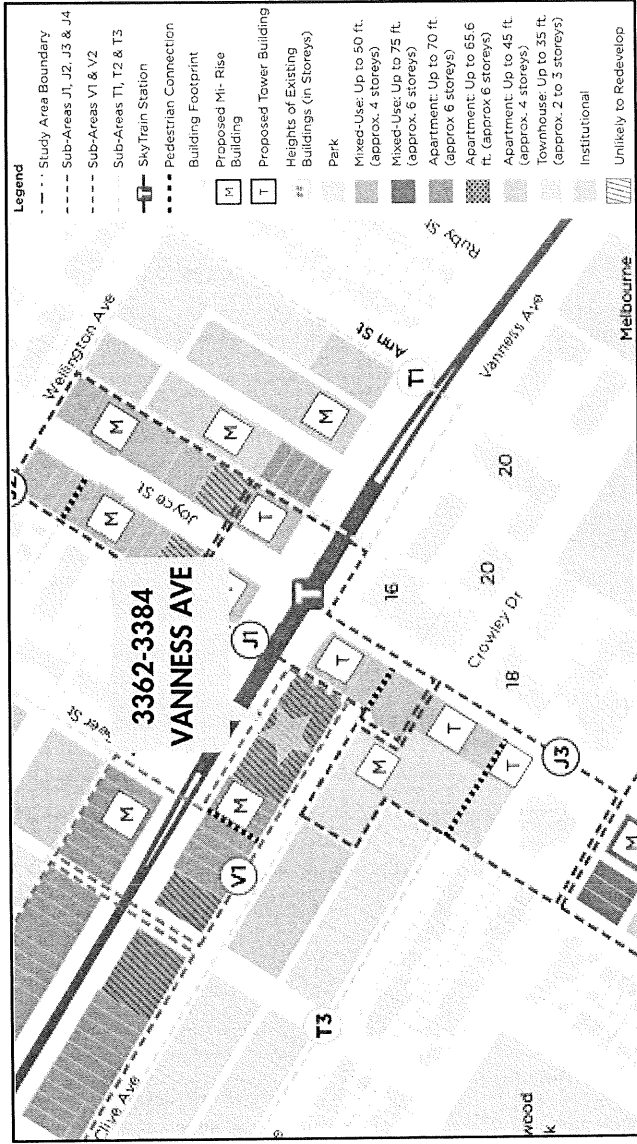
3362 - 3384 Vanness Ave  
& 3347 Clive Ave

2023-10-30



# Vanness | Site Overview

The Joyce-Collingwood Station Precinct Plan was approved in 2016 and was focused on the two blocks immediately surrounding the Joyce-Collingwood SkyTrain Station.



Source: Joyce Collingwood Station Precinct Plan, City of Vancouver (2016)

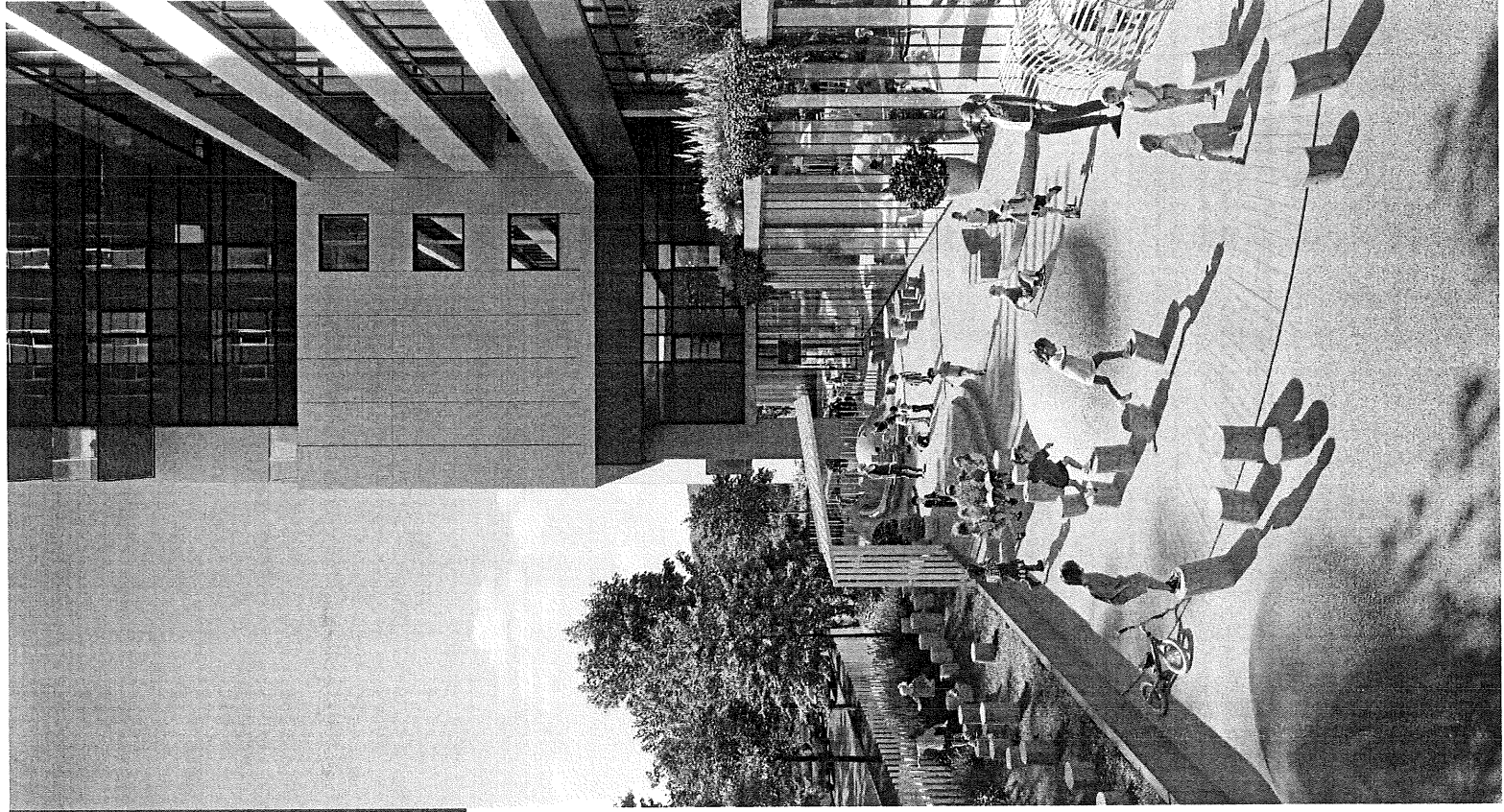
- Site was designated as "unlikely to be redeveloped" in the Joyce-Collingwood Plan.
- The density/height is not envisioned as other transit-adjacent sites.
- Policy non-compliant rezoning application requesting additional height and density in-line with other transit-adjacent properties.



# Vanness | Site Overview

Our proposal is for two towers above a mid-rise podium that will provide much needed rental housing with a range of options and affordability, and public childcare spaces for the community.

<b>Form of Development</b>	30 (west) and 33 (east) -storey mixed use building connected with a 6-storey podium
<b>Uses</b>	Rental residential, daycare, and retail
<b>Residential Mix</b>	679 new rental homes, of which 10% will be at 15% below-market rental rates
<b>Childcare</b>	Not-for-profit daycare for 37-children
<b>Retail</b>	7 small-scale retail spaces
<b>Public Realm Improvements</b>	A new mid-block connections that provides a convenient and safe access from Clive/St.Mary's Elementary School to the station. New and expanded sidewalks with trees, plants, seating and lighting.
<b>Parking</b>	Four levels of underground parking for vehicles and bicycles

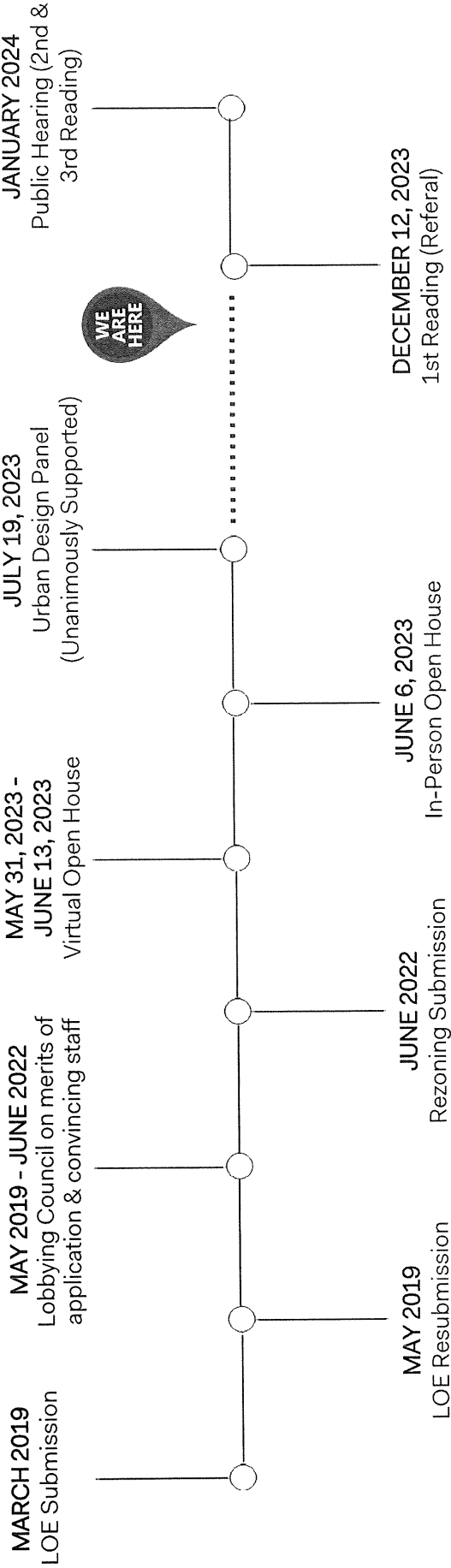




# Vanness | Timeline

Due to the policy non-complaint nature of the rezoning application, the approvals process has been protracted. The project is now proceeding to Council with staff support.

## Completed...

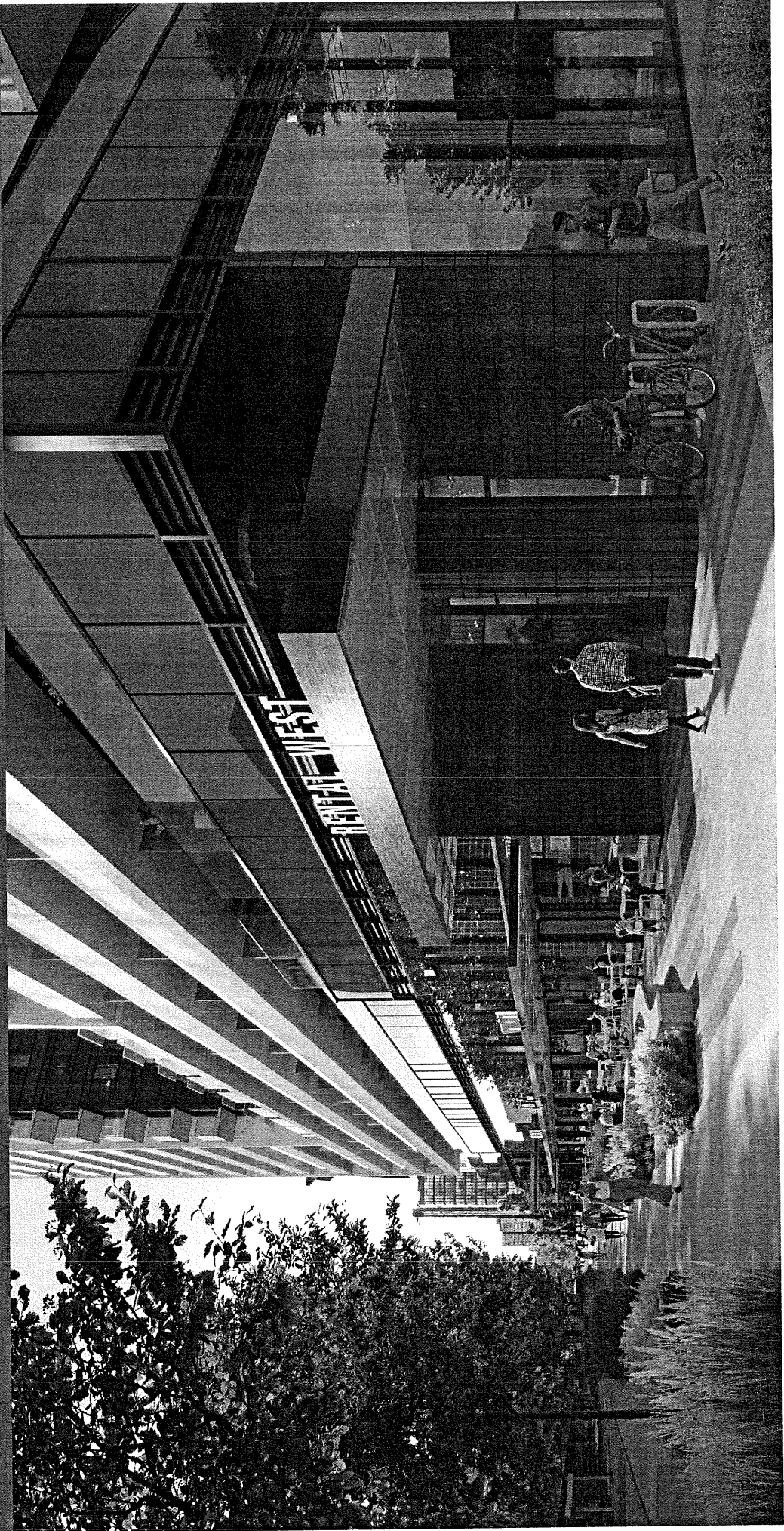


## Upcoming...



# QUESTIONS?

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# How Can You Help?

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Providing support at a Public Hearing is imperative to the project's rezoning success.

- Write a letter of support
- Speak at Public Hearings
- Spread the word!

Community consultation consultant:

**Sophie Perndl**

[sophie@poonigroup.com](mailto:sophie@poonigroup.com)

604.506.9255

