VANCOUVER
APR 28 2026
REGISTRY

This is the 4th Affidavit of Derek Lai
in this case and was made on April 23rd, 2026

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

I, Derek Lai, Chartered Professional Accountant, of Crowe MacKay & Company Ltd., care of 1600 – 925 West Georgia Street, in the City of Vancouver, in the Province of British Columbia, SWEAR THAT:

1. I am President of Crowe MacKay & Company Ltd. ("**Crowe MacKay**" or 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. As I set out in my first affidavit, Crowe MacKay, represented by me, was appointed the liquidator of The Owners, Strata Plan LMS992 ("**Joyce Place Strata**"), known as Joyce Place, by way of a resolution passed at a special general meeting held on July 7, 2021. That appointment was subsequently confirmed by the order of Justice Marzari pronounced October 19, 2022 (the "**Confirmation Order**").

3. Among other things, the Confirmation Order approved the sale of the Joyce Place lands and buildings (the "**Property**") to Intracorp Vaness Limited Partnership ("**Intracorp**") pursuant to a written purchase and sale agreement dated January 11, 2021, as amended (the "**PSA**"). The

Liquidator was not involved in the negotiation of the PSA as it pre-dated the Liquidator's appointment and confirmation.

4. In my role as Liquidator, and with the assistance of the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson Lundell**"), I oversaw the wind-up of the Joyce Place Strata and the sale of the Property.

5. Attached hereto and marked as **Exhibit "A"** to this Affidavit is a true copy of the engagement agreement with Lawson Lundell and the Liquidator for the wind-up and sale of Joyce Place, dated April 1, 2020.

A. Intracorp's Civil Action and the Liquidator's Response

6. On September 9, 2024 (the "**Closing Date**"), the PSA completed and the Property was transferred by the Liquidator to Intracorp.

7. In the days before the Closing Date, Intracorp alleged that the Joyce Place Strata and the Liquidator had breached the PSA by failing to maintain the condition of the tower structure and the adjacent eight townhouses (the "**Townhouses**"). Intracorp also claimed that no amount was payable pursuant to Schedule G of the PSA which deals with the calculation of the purchase price adjustment (the "**PPA**").

8. On the Closing Date, Intracorp filed a claim against the Liquidator and the Joyce Place Strata alleging that they had breached the PSA by failing to:

(a) keep the fire alarm system at Joyce Place in working order;

(b) keep the Townhouses in the same condition as they had been in on January 11, 2021; and

(c) comply with City of Vancouver orders made in relation to Joyce Place

(the "**Intracorp Claim**").

9. Attached hereto and marked as **Exhibit "B"** to this Affidavit is a true copy of the Notice of Civil Claim filed by Intracorp, dated September 9, 2024.

10. On the Closing Date, Intracorp also filed a Notice of Application in the Intracorp Claim seeking an order requiring the Liquidator to hold back $525,000 from the Property sale proceeds to secure Intracorp's damages arising from the alleged breaches of the PSA by the Liquidator and the Joyce Place Strata (the "**Holdback Application**"). Intracorp also filed a Requisition to have the Holdback Application heard on short notice on the Closing Date.

11. Attached hereto and marked as **Exhibit "C"** to this Affidavit is a true copy of the Notice of Application filed by Intracorp, dated September 9, 2024.

12. Attached hereto and marked as **Exhibit "D"** to this Affidavit is a true copy of the Requisition filed by Intracorp, dated September 9, 2024.

13. The Liquidator filed an Application Response on the Closing Date in the Intracorp Claim opposing the relief sought by Intracorp in the Holdback Application.

14. Attached hereto and marked as **Exhibit "E"** to this Affidavit is a true copy of the Application Response filed by the Liquidator, dated September 9, 2024.

15. The Holdback Application was heard on the Closing Date before Justice Kent. At the conclusion of the hearing, Justice Kent granted the relief sought by Intracorp. Attached hereto and marked as **Exhibit "F"** to this Affidavit is a true copy of the Order of Justice Kent, dated September 9, 2024.

16. After the Order of Justice Kent was pronounced, Lawson Lundell withheld the sum of $525,000 from the special levy funds it held in trust for the Liquidator and which would otherwise have been available to distribute to the owners sp.

17. The Liquidator filed a Response to Civil Claim on November 1, 2024, pleading, among other things, that it complied with all obligations under the PSA, delivered the Property to Intracorp in the same condition as it had been on January 11, 2021 and that it disclosed all relevant information known to the Liquidator in advance of the Closing Date.

18. Attached hereto and marked as **Exhibit "G"** to this Affidavit is a true copy of the Response to Civil Claim filed by the Liquidator, dated November 1, 2024.

19. The Liquidator also filed a Counterclaim against Intracorp in the Intracorp Claim on November 1, 2024, pleading that Intracorp had breached the PSA by refusing to account for and pay to the Liquidator the PPA, thereby causing the Liquidator and the Joyce Place Strata loss and expense (the "**Counterclaim**").

20. Attached hereto and marked as **Exhibit "H"** to this Affidavit is a true copy of the Counterclaim filed by the Liquidator, dated November 1, 2024.

B. Proceedings Following the Exchange of Pleadings

(a) *Application to Dismiss Intracorp's Claim*

21. On March 11, 2025, the Liquidator filed a Notice of Application seeking the dismissal of the Intracorp Claim (the "**Application to Dismiss**").

22. The basis of the Application to Dismiss was that, as of the Closing Date, the Property's fire alarm system was fully operational, the Townhouses were in substantially the same condition as in 2021 and all City of Vancouver prosecution issues were resolved. Accordingly, there were no breaches of the PSA by the Liquidator or the Joyce Place Strata.

23. Attached hereto and marked as **Exhibit "I"** to this Affidavit is a true copy of the Application to Dismiss, dated March 11, 2025.

24. The Liquidator, with the assistance of Lawson Lundell, prepared and filed a variety of affidavit evidence in support of the Application to Dismiss, including:

(a) Affidavit #1 of Paul Good, made February 5, 2025 ("**Good #1**");

(b) Affidavit #1 of Tetsu Takagaki, made February 18, 2025; and

(c) Affidavit #1 of Rene Saucier, made February 19, 2025.

25. I am advised by Jordan Hayward, a lawyer employed by Lawson Lundell, and verily believe to be true, that after the Intracorp Claim was filed, Lawson Lundell engaged Paul Good, a professional engineer, to inspect the Townhouses and provide his opinion on whether they remained in the same condition and state of repair as they had been on January 11, 2021.

26. Mr. Good prepared an inspection report confirming the condition of the Townhouses, and provided that report to Lawson Lundell on January 17, 2025. That report was appended as an exhibit to Good #1, which summarized Mr. Good's observations of the condition of the Townhouses between June 17, 2020 and January 17, 2025.

27. I am further advised by Mr. Hayward, and verily believe, that Lawson Lundell also contacted Rene Saucier, a security technician who provided fire monitoring services at the Property from 2018 to 2024, and drafted an affidavit on his behalf attesting to the working condition of the fire monitoring system as of the Closing Date.

28. I am further advised by Mr. Hayward, and verily believe, that to supplement Mr. Saucier's affidavit, Lawson Lundell prepared an affidavit of Tetsu Takagaki, a senior manager employed by Crowe MacKay, to confirm the working condition of fire monitoring system at the Property as of the Closing Date.

(b) *Document Exchange and Examinations for Discovery*

29. In February 2025, the Liquidator provided Lawson Lundell with all documents in its possession that were requested for disclosure in the litigation with Intracorp. Those documents were reviewed by Lawson Lundell and organized into the Liquidator's List of Documents disclosed to Intracorp on April 17, 2025.

30. Attached hereto and marked as **Exhibit "J"** to this Affidavit is a true copy of the Liquidator's List of Documents, dated April 17, 2025.

31. Between February and September 2025, the Liquidator provided Lawson Lundell with additional documents as they became available, which Lawson Lundell reviewed and organized into Amended Lists of Documents disclosed to Intracorp on June 25, August 25 and September 4, 2025.

32. I am advised by Mr. Hayward, and verily believe, that Intracorp provided List of Documents dated June 3, 2024, and an Amended List of Documents dated September 16, 2024, which Lawson Lundell reviewed, profiled and marked for relevance for use in the litigation.

33. In September 2025, Lawson Lundell and counsel for Intracorp conducted examinations for discovery of a representative of the opposing party. Evan Allegretto, Intracorp's president, was examined on September 8, 2025, and I was examined as the Liquidator's representative on September 9, 2025.

34. I am advised by Mr. Hayward, and verily believe, that Lawson Lundell ordered and the transcripts from the examination of Mr. Allegretto for inclusion in the Application to Dismiss and other material, as necessary.

(c) *PPA Application*

35. On October 3, 2025, the Liquidator filed a Notice of Application in the Intracorp Claim seeking an order that Intracorp pay to the Liquidator the PPA amount of $3,195,129.29, plus pre-judgement interest from September 9, 2025 (the "**PPA Application**").

36. Attached hereto and marked as **Exhibit "K"** to this Affidavit is a true copy of the PPA Application, dated October 3, 2025.

37. In support of the PPA Application, the Liquidator filed affidavit evidence that, among other things, calculated the purchase price increase under Schedule G of the PSA using BC Assessment values and appended a report prepared by Charles (Chuck) Brook, a real estate planning and development expert. Mr. Brook's report opined that the "Comparable Development Changes", as defined in Schedule G of the PSA, identified by Intracorp as the reason no PPA was payable had no application in the circumstances of Schedule G of the PSA.

38. Attached hereto and marked as **Exhibit "L"** to this Affidavit is a true copy of Mr. Brook's expert report, dated September 12, 2025.

39. The Liquidator also filed an affidavit from a BC Assessment employee confirming that in determining the assessment values of each of the "Comparable Developments" listed in Schedule G of the PSA, the BC Assessment Authority made no value adjustments to those assessments based on any of the "Comparable Development Changes" Intracorp relied on to challenge the PPA.

C. Communications with Council and Former Owners

40. After the Confirmation Order was pronounced and throughout the liquidation process of the Joyce Place Strata, I, on behalf of the Liquidator, prepared written updates to the former owners on the status of the wind-up and sale of the Joyce Place Strata and, later, the litigation with Intracorp. Those updates were distributed to the former owners by Lawson Lundell via email on a regular basis.

41. During this period, I estimate that the Liquidator prepared and issued 21 updates to the former owners of the Joyce Place Strata in this manner.

42. Attached hereto and marked as **Exhibit "M"** to this Affidavit is a true copy of an update from the Liquidator dated November 9, 2022, provided as an example of the written updates prepared and issued by the Liquidator.

43. Over the course of the litigation with Intracorp, the Liquidator and Lawson Lundell met with the former Joyce Place Strata council members to update them on the status of the litigation, provide recommendations on next steps and obtain instructions on how to proceed. Those meetings occurred on September 3, September 5 and October 1, and October 30, 2025. There were also meetings held subsequent to the aforesaid to discuss and consider a settlement with Intracorp, which will be discussed in greater detail below.

44. In addition to those meetings, and as discussed below, in advance of a special general meeting on January 21, 2026 to vote on a possible settlement with Intracorp, the Liquidator held an information session for all former Joyce Place Strata owners on January 15, 2026, to explain the implications of settling the Intracorp Claim and Counterclaim and to respond to their questions.

D. Settlement of the Intracorp Claim and the Counterclaim

45. In October 2025, after service of the PPA Application, counsel for Intracorp contacted Lawson Lundell to engage in settlement negotiations regarding the Intracorp Claim and the Counterclaim.

46. As those negotiations progressed into late 2025, the Liquidator and Lawson Lundell met with the former Joyce Place Strata council to, among other things, present and discuss settlement offers from Intracorp and to consider and agree on any counteroffers. Those meetings occurred on October 30, November 3, November 10, December 18, 2025, and January 12 and 15, 2026.

47. In December of 2025, Intracorp and the Liquidator reached a conditional settlement of the Intracorp Claim and the Counterclaim (the "**Settlement**").

48. As settlement of the Counterclaim involved the disposition of a Joyce Place Strata asset, approval of the Settlement required a ¾ vote of the former Joyce Place Strata owners. On January 21, 2026, the Liquidator held a special general meeting (the "**SGM**") of the former Joyce Place Strata owners to vote on the Settlement. I attended the SGM which was held at the Neighbourhood House Annex at 3690 Vanness Ave. in Vancouver nearby to Joyce Place.

49. Fifty-one former Joyce Place Strata owners attended the SGM in person or by proxy. The resolution to accept the Settlement passed unanimously, with one abstention.

50. Intracorp paid the Settlement funds to Lawson Lundell in trust on January 29, 2026.

E. Fund Distribution to Owners

51. Following receipt of the Settlement funds by Lawson Lundell, the Liquidator and Lawson Lundell undertook the task of arranging to distribute those monies, and other Joyce Place funds held by the Liquidator, to the former Joyce Place Strata owners. In addition to the Settlement funds of $3 million, the Liquidator held in trust with Lawson Lundell the amount of $1,190,749.50, for a total of $4,190,749.05. The additional funds comprised remaining special levy, contingency reserve ("**CRF**") and operating funds for Joyce Place, and holdbacks for Liquidator and legal fees collected as part of the completion of the PSA in September 2024, all as approved in individual owners' orders to pay.

52. From the Joyce Place funds held in trust as of January 31, 2026, the Liquidator used a total of $526,814.44 to pay accounts receivable owing to it and Lawson Lundell as at January 31, 2026, as well as payment of the additional commission to the realtor on the Settlement funds. The amount of $3,562,025.41 was then distributed rateably to the former Joyce Place Strata owners. The distributions to the individual owners occurred throughout February and March 2026, with the last of the owners picking up their cheque on March 24, 2026.

53. After this distribution, the Liquidator retains, in trust with Lawson Lundell, a $50,000 holdback from the CRF, as well as residual legal and liquidator holdbacks from the original net sales proceeds of $12,774.99 (Liquidator) and $9,995.42 (legal) respectively. As a result, Lawson Lundell currently holds in trust a total amount of $72,770.41.

54. I am advised by Lisa Frey, a partner with Lawson Lundell, and verily believe, that Lawson Lundell has received payment for all accounts to February 28, 2026 and has current unbilled work in progress ("**WIP**") through March 31, 2026, of $7,428.61 (including taxes and disbursements).

55. As of the date of this affidavit, the Liquidator has received payment for all accounts to February 28, 2026 and has current unbilled WIP through March 31, 2026 of $2,589.49 (including disbursements and excluding taxes).

56. Once the final Liquidator and legal fees are paid following the Liquidator's discharge, any remaining trust funds will be distributed rateably by the Liquidator to the former Joyce Place Strata owners.

F. The Density Bonus

57. The terms of the PSA include Schedule F which sets out a formula for the possible payment of a density bonus (the "**Density Bonus**").

58. Whether the Density Bonus is payable depends on several conditions, including the City of Vancouver rezoning the Property, Intracorp obtaining a permit for a higher floor-space ratio than the minimum required for the development, and Intracorp beginning excavation by September 2029 after securing construction financing.

59. I was asked by the members of the former strata council to consider whether or not there was a realistic prospect that the Density Bonus would likely be paid. I discussed this issue with and sought advice from the Liquidator's counsel on this issue. Given the multiple conditions required by the Density Bonus together with the typical timelines for processing and development approvals in the City of Vancouver and Intracorp's current development plans for Joyce Place, it would in my view be unlikely that all the conditions required to trigger payment of the Density Bonus will be satisfied or that this will occur by September 2029.

60. Accordingly, in consultation with the the former Joyce Place Strata council members, the Liquidator decided it was provident to seek its discharge before the issue of whether the Density Bonus is payable is ultimately known. Seeking a discharge now will both save the former Joyce Place Strata owners future Liquidator fees and allow for the distribution of a larger portion of the remaining Joyce Place Strata funds to owners immediately. The Liquidator sent an update to the former Joyce Place Strata owners explaining this decision and welcoming former owners to reach out if they have any concerns with this approach. I have not received any comments or expressions of concern over this decision from any owners to date.

61. Attached hereto and marked as **Exhibit "N"** to this Affidavit is a true copy of the information package prepared by Lawson Lundell explaining why the Density Bonus is not likely to become payable that was distributed to the former Joyce Place Strata owners on February 23, 2026.

62. If the Liquidator waits to seek its discharge until it is known for certain whether the Density Bonus is payable, then the Liquidator would have held back from distribution to the former Joyce Place Strata owners aa larger amount of funds to secure its fees and the costs of possible future litigation with Intracorp over the Density Bones.

G. Final Accounts

63. The Liquidator's total fees to February 28, 2026, inclusive of taxes and disbursements, in respect of the wind-up of the Joyce Place Strata and sale of the Property are summarized in the following table:

Invoice Date	Invoice No.	Amount Owing
November 21, 2022	405981	$19,737.91
January 5, 2023	408291	$24,696.26
February 14, 2023	410861	$12,175.86
April 25, 2023	417901	$18,411.23
May 9, 2023	421651	$3,188.06
June 14, 2023	424285	$8,638.09
July 12, 2023	426987	$7,041.83
August 21, 2023	428970	$5,147.63
September 21, 2023	430301	$6,097.88
October 13, 2023	431322	$6,006.00
November 21, 2023	433491	$6,938.40
December 20, 2023	435577	$10,244.06
January 19, 2024	437820	$3,971.89
March 11, 2024	440589	$8,402.10
March 25, 2024	441585	$4,835.25
April 11, 2024	444354	$1,166.55
May 14, 2024	451520	$1,008.00
June 28, 2024	454479	$4,317.08
August 2, 2024	457540	$3,847.20
November 27, 2024	463684	$24,959.03
November 27, 2024	463685	$32,834.85
January 14, 2025	467235	$5,937.75
January 21, 2025	467473	$3,022.69

March 4, 2025	469466	$4,098.41
April 4, 2025	472967	$1,871.63
May 7, 2025	480723	$3,559.50
May 7, 2025	480754	$3,534.56
June 3, 2025	489165	$2,680.13
August 1, 2025	489325	$3,471.56
September 15, 2025	491707	$3,957.19
October 6, 2025	492548	$2,415.00
October 7, 2025	492639	$17,861.81
December 11, 2025	496972	$7,054.43
January 22, 2026	500270	$4,566.98
February 13, 2026	501640	$11,990.21
March 20, 2026	503990	$4,638.64
	TOTAL:	**$294,325.65**

64. Identified and marked as **Exhibit "O"** to this affidavit are true copies of all the Crowe MacKay invoices issued in respect of this matter to date. Collectively, these invoices greatly exceed 10 pages in length and, for that reason, are not appended to my affidavit but are available for inspection by any party to this proceeding and will be made available for the use of the court if requested.

65. Throughout the windup of the Joyce Place Strata, the Liquidator regularly emailed its accounts and those of its counsel to the members of the strata council and the Joyce Place property manager. By way of example, attached to and marked as **Exhibit "P"** to this affidavit is one of these reporting emails, dated February 17, 2026, sent out by the Liquidator to the former Joyce Place strata council. To date, the Liquidator has not received any comment about or criticism over its accounts from any of the Joyce Place owners.

66. As the Liquidator's involvement with this matter concludes, I anticipate that Crowe MacKay will likely incur approximately an additional $12,000 in fees (exclusive of taxes and disbursements) for services required to finalize the Liquidator's discharge and complete remaining unbilled work. This is in addition to the unbilled WIP of $4,423.34 noted in paragraph 55 above.

67. I am advised by Mr. Hayward, and verily believe, that Lawson Lundell's total legal fees to January 31, 2026, inclusive of taxes and disbursements, in respect of wind-up of the Joyce Place Strata and sale of the Property are summarized in the following table:

Invoice Date	**Invoice No.**	**Amount Owing**
November 21, 2022	1207278	$16,047.35
December 9, 2022	1209133	$21,284.12
January 26, 2023	1215269	$30,873.69
January 31, 2023	1215390	$3,448.69
February 27, 2023	1218728	$4,215.12
March 30, 2023	1222771	$8,382.47
April 28, 2023	1228047	$9,234.72
June 23, 2023	1234598	$1,437.63
August 18, 2023	1242505	$2,859.92
September 20, 2023	1245676	$4,615.49
October 23, 2023	1248755	$9,194.12
December 19, 2023	1261434	$40,177.46
December 31, 2023	1264704	$5,710.80
February 16, 2024	1268670	$1,513.82
March 25, 2024	1274915	$2,248.06
June 24, 2024	1287222	$20,230.40

July 19, 2024	1289212	$9,811.61
August 19, 2024	1293616	$31,454.15
October 18, 2024	1305063	$172,039.73
December 16, 2024	1314167	$49,945.97
December 31, 2024	1319432	$3,595.10
February 18, 2025	1323473	$35,937.31
March 17, 2025	1330179	$28,092.42
April 28, 2025	1335323	$19,221.30
May 19, 2025	1339235	$12,783.83
June 20, 2025	1343984	$15,780.13
July 18, 2025	1349298	$30,335.70
August 18, 2025	1353553	$26,010.05
September 25, 2025	1356203	$27,844.41
October 24, 2025	1359230	$89,279.94
November 27, 2025	1365107	$21,558.45
December 19, 2025	1373363	$6,052.01
December 31, 2025	1378406	$16,579.34
February 13, 2026	1382482	$41,922.61
March 19, 2026	1388695	$12,509.76
	TOTAL:	**$832,227.68**

68. Identified collectively and marked as **Exhibit "Q"** to this affidavit are true copies of all the Lawson Lundell invoices issued in this matter, with privileged information redacted. Collectively, these invoices also greatly exceed 10 pages in length and, for that reason, are not

appended to my affidavit but are available for inspection by any party to this proceeding and will be made available for the use of the court if requested.

69. In consultation with Lawson Lundell, I am of the view that the cost to obtain the Liquidator's discharge and pass the accounts of the Liquidator and counsel is likely to be between $30,000 and $50,000, exclusive of disbursements and taxes. This estimate is premised on the assumption that the passing of accounts and discharge may be done summarily, without a registrar's hearing, and will not be opposed. Based on this, the Liquidator and Lawson Lundell agree to cap their respective fees to a total of up to $50,000, plus taxes and disbursements, for the application to pass the Liquidator's accounts, including those of its counsel, and obtain the Liquidator's discharge.

70. Once the Liquidator's accounts, and those of its counsel, have been passed and the Liquidator is to be discharged, any remaining funds held by the Liquidator on behalf of the Joyce Place Strata will be distributed to the former owners of Joyce Place.

SWORN BEFORE ME at Vancouver, British Columbia on April 23rd, 2026.

A Commissioner for taking Affidavits for British Columbia.

PETER J. ROBERTS, Q.C.
Barrister & Solicitor
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VANCOUVER, B.C. V6C 3L2
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DEREK LAI

LAWSON LUNDELL LLP

Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2
T: 604 685 3456

This is Exhibit " A " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026.

A Commissioner for taking Affidavits for British Columbia.

April 1, 2020

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

BY EMAIL
(*Derek.Lai@crowemackay.ca*)

Crowe MacKay & Company Ltd.
1100-1177 West Hastings Street
Vancouver, B.C.
V6E 4T5

Attention: Derek Lai, Licensed Insolvency Trustee,
Partner & Senior Vice President

Dear Sirs and Mesdames:

RE: Engagement Agreement

Thank you for retaining Lawson Lundell LLP to provide legal advice and services. We welcome you as a client and we look forward to a successful professional relationship.

We believe that it is essential that you and we have the same understanding with respect to our engagement. Accordingly, we take this opportunity to attach a copy of our Terms of Engagement which, in conjunction with this letter, will comprise our Engagement Agreement with you. If you have any questions concerning the Engagement Agreement, we ask that you contact the writer promptly.

Scope of Legal Services

You have retained us to provide legal advice and services leading up to and in connection with your appointment and role as court appointed liquidator of The Owners, Strata Plan Strata Plan LMS992 (the "**Strata**") pursuant to the provisions of the *Strata Property* Act in relation to the wind-up of the Strata and a potential sale of the Strata lands, known as Joyce Place, a property located at 3380 Vanness Avenue, Vancouver, B.C., to Intracorp Acquisition Co. Ltd. ("**Intracorp**"). Provided the requisite resolutions are passed by the Strata members pursuant to the *Strata Property Act*, and a contract for the sale of the Strata lands is approved, either for a sale to Intracorp. or another purchaser, our engagement includes undertaking on behalf of the liquidator and the individual strata lot owners the closing and conveyance for such a sale of the Strata lands.

To the extent you wish us to provide additional services and we agree to do so, then except as otherwise agreed at the time or as set out in this letter, the attached Terms of Engagement will

also apply to any additional legal advice and services that we provide to you. We confirm that you have not asked us to act on a continuing basis for or as general counsel to Crowe MacKay & Company Ltd.

Instructions and Reporting

We confirm that we have been retained to act for Crowe MacKay & Company Ltd., in its capacity as the liquidator of the Strata.

We understand that Derek Lai will give us instructions and provide us with assistance in obtaining any information which we may require. We will provide Mr. Lai with reports of progress and developments.

Application of Taxes

As described in section IX of the Terms of Engagement, we will charge GST/HST on our services and disbursements based on the rate of tax applicable to the jurisdiction of the place of supply of our services for the purposes of the GST/HST unless our services for this engagement are exempt from GST/HST. We will also charge provincial sales tax (PST) on our services where applicable.

Based on the information provided to date, we understand that for the purposes of the GST/HST the province or territory of the place of supply of our services to you with respect to this engagement is British Columbia. Unless you advise us to the contrary, we will implement billing of taxes based on that place of supply. The concept of place of supply is not static and may change; accordingly, we may change the place of supply and our billing of taxes in relation to this engagement when we become aware of circumstances that change the place of supply under the applicable legislation, regulations or rules.

Based on the information provided to date, we understand that you are resident in B.C. or carry on business in B.C. and that the services we are providing to you relate to one or more of the following:

- real property located in B.C.
- litigation to be conducted in B.C.

and therefore we are obligated to charge PST in connection with our services.

Fees

In setting our fees, we give primary consideration to the time and effort devoted to the advice and services provided by our lawyers and other personnel charged at hourly fee rates. However, fees calculated on this basis often do not reflect the full value of the services. Accordingly, we reserve the right to increase our fees to take into account the additional value factors listed in the Terms of Engagement including but not limited to:

- the complexity, difficulty or novelty of the issues involved;

- the skill, specialized knowledge and responsibility required;
- the monetary value of the matter (for example, the size of a corporate transaction or the amount involved in litigation proceedings);
- time constraints, such as a deadline on a commercial transaction or the need for injunctive or other emergency relief;
- the experience, reputation and expertise of our lawyers or other personnel performing the services;
- the extent to which our office procedures and systems and our experience result in efficiencies;
- the customary charges of other lawyers of equal standing in similar matters and circumstances;
- the likelihood, if made known to you, that the acceptance of the engagement on your behalf will result in our inability to accept other employment; and
- achieving a successful result.

The current hourly rates for the key lawyers and personnel who will provide services to you are:

• Ed Wilson (lawyer)	$640.00
• Peter Roberts, Q.C. (lawyer)	$535.00
• Bryan Gibbons (lawyer)	$500.00
• Camille Chisholm (lawyer)	$360.00
• Articled Clerk	$200.00
• Paralegal	$150.00 – $220.00

We may also engage other lawyers and personnel within the Firm to assist us in providing you with legal advice and services in a timely and efficient manner. Their hourly rates will be within the general range of the rates quoted for the key lawyers and personnel. As indicated in the Terms of Engagement, we review our fee rates annually, and any adjustments will be reflected in our accounts.

As we will be acting for you in your capacity as a liquidator whose appointment is to be confirmed by the court, we acknowledge that our fees are subject to assessment before the court and, subject to any agreement between us to the contrary, we will not seek to recover fees that are not passed by the court or otherwise agreed to by the Strata. We rely on you to enter into an engagement agreement with the Strata that provides for your recovery of fees and costs incurred by you, including legal fees, that may be incurred prior to your court confirmation and in the event, for whatever reason, your appointment as liquidator is not passed at the Strata's special general meeting or subsequently confirmed by the court.

Retainer

We are presently not requesting a retainer. We reserve the right to seek an initial retainer or an additional retainer should we consider it appropriate in the circumstances. Any retainer amount will be held in trust until such time as it is applied to any interim or final account rendered to you, and you hereby authorize us to apply the amount in trust in such manner. We reserve the right to call for an increase in the retainer amount should we consider it appropriate to do so under the circumstances. In the event we apply some or all of the retainer amount to any interim account, as authorized by this Engagement Agreement, you agree to promptly deposit further funds with us so that the retainer amount on deposit with us does not fall below the greater of the initial retainer amount or any increased retainer amount called for under this agreement.

Consent to Representation of Parties Potentially Adverse in Interest

Our Firm represents and may in future represent many clients in a diverse range of industries and businesses, including the industry in which you operate. By entering into this Engagement Agreement, you consent to our Firm continuing to represent existing clients and undertaking to represent existing and new clients in any matter that is substantially unrelated to our work for you, even if the interests of those other clients in such matters are directly adverse to your interest, including litigation to which you are or may become a party. The prospective consent reflected in the preceding sentence will not apply if as a result of our representation of you, we are in possession of confidential information concerning you, your business or affairs that might reasonably affect our representation of the other client.

We maintain and will maintain confidentiality of all confidential information provided to us by our clients. Accordingly, you agree that our representation of you does not require us to disclose to you any confidential information of other clients, and in turn we will not undertake any future representation of another client if to do so would require us to disclose your confidential information.

Primary Contact Lawyer

Your primary contact lawyer and the lawyer responsible for ensuring that you are receiving satisfactory service will be Peter J. Roberts. If you have any questions or concerns about the service which we are providing to you, you should also feel free to contact our Managing Partner.

Governing Law and Jurisdiction

This Engagement shall be governed by and interpreted in accordance with the laws of British Columbia, including the federal laws of Canada applicable therein. All disputes and claims arising out of, or in any way connected with, this Engagement shall be referred to the courts of British Columbia, and each of the parties hereby attorns to the non-exclusive jurisdiction of the courts of British Columbia.

Confirmation of Terms

Please sign the enclosed copy of this letter to confirm your acceptance of our Engagement Agreement. We recommend that you keep a copy of the Agreement on your file for reference.

While you have been asked to sign a duplicate copy of the Engagement Letter, if you instruct us to perform work following your receipt of this letter, we will proceed on the basis that you have accepted these Terms of Engagement.

We look forward to working with you in connection with this engagement and in connection with any other matters in which you may require our legal services.

LAWSON LUNDELL LLP

Peter J. Roberts, Q.C.

PJR/fll
Enc.

WE AGREE TO THE TERMS AS SET OUT IN THIS LETTER.

Date: April 23rd, 2020

Derek Lai, on behalf of Crowe MacKay & Company Ltd., in its capacity as the intended liquidator of the Strata

LAWSON LUNDELL LLP

TERMS OF ENGAGEMENT

I. INTRODUCTION

We are pleased that you have chosen to retain Lawson Lundell LLP to provide legal advice and services.

By our Engagement Letter and these Terms of Engagement we wish to set out in advance the terms that will govern our professional relationship with you, consistent with our professional responsibilities. We ask that you review these Terms very carefully and we encourage you to discuss any questions or concerns which you may have with us.

While you have been asked to sign a duplicate copy of the Engagement Letter, if you instruct us to perform work following your receipt of this letter, we will proceed on the basis that you have accepted these Terms of Engagement.

II. SCOPE OF SERVICES

These Terms will apply to all legal advice and services that are specifically identified in our Engagement Letter. To the extent you wish us to provide additional services and we agree to do so, then except as otherwise agreed at the time or as set out in the Engagement Letter, these Terms will apply to all such additional legal advice and services that we provide to you.

Our engagement will not extend to acting as general counsel on a continuing basis solely by virtue of our engagement on one or more specific matters. Our engagement also will not extend to providing future updates of changes in law or revised advice resulting from changed circumstances. You agree that we have not been engaged to monitor your continuing rights and obligations at law, under contract, statute or otherwise, including, without limitation, with respect to adherence to time limits for the performance of certain acts or obligations. We therefore advise you to diarize your continuing rights and obligations and relevant time limits imposed by law or contract so that you may arrange for all appropriate action to be taken at the required times.

III. SERVICE RELATIONSHIPS

We will identify a primary contact lawyer who will assume general responsibility for ensuring that you receive satisfactory legal services in connection with all matters. You should feel free to discuss with that lawyer any and all aspects of the legal services that we provide to you, including the services provided by other lawyers or staff, and including any issues relating to our accounts.

In addition, you should feel free to contact our Managing Partner at any time if you have any questions or concerns relating to the legal services that we provide to you.

IV. INTERNET COMMUNICATIONS

Much of our communication with or on behalf of our clients occurs by email, which is the mode of communications most clients have indicated they prefer. If you have concerns about the security and confidentiality of email communications and do not wish to communicate with us or have us communicate on your behalf by email, please advise us in writing. If you wish us to encrypt email messages to you or on your behalf to ensure a higher level of security and confidentiality (at your cost), please advise your primary contact lawyer or any other lawyer responsible for providing you with legal services so that appropriate arrangements can be made. In the absence of any specific written instructions from you, it will be our mutual agreement that communications to you and on your behalf may be made by email, and you accept any potential limits on email security and confidentiality.

Our clients also often request that we communicate using other forms of Internet-based electronic communication, including online audio- or video-conferencing, social media, instant messaging and online forums. Information sent or received over the Internet is generally unsecure and we cannot, and do not, make any representation or warranty concerning security or confidentiality of any such communication to or from us or any representation or warranty regarding the risks of interception of such communications by third parties. We also cannot retain records of all such types of communication as part of our client records. If you choose to communicate with us using any form of Internet-based electronic communication, then absent any specific written instructions from you, it will be our mutual agreement that we may communicate with you using such communication tool or tools and you accept any potential limits on our ability to retain a record of such communication and on its security and confidentiality.

V. PROFESSIONAL FEES

In setting our fees, we give primary consideration to the time and effort devoted to the legal advice and services provided by our lawyers and other personnel charged at hourly fee rates. However, fees calculated on this basis often do not reflect full value of the services. Accordingly, we reserve the right to increase our fees to take into account the following additional value factors:

- the complexity, difficulty or novelty of the issues involved;
- the skill, specialized knowledge and responsibility required;
- the monetary value of the matter (for example, the size of a corporate transaction or the amount involved in litigation proceedings);
- time constraints, such as a deadline on a commercial transaction or the need for injunctive or other emergency relief;
- the experience, reputation and expertise of our lawyers or other personnel performing the services;
- the extent to which our office procedures and systems and our experience result in efficiencies;
- the customary charges of other lawyers of equal standing in similar matters and circumstances;
- the likelihood, if made known to you, that the acceptance of the engagement on your behalf will result in our inability to accept other employment; and
- achieving a successful result.

We will keep accurate records of the time we devote to your work. We bill our time in increments of one-tenth of an hour and our time charges include, but are not limited to, case assessment, development and administration, discoveries, trial preparation and trials, appeals, project administration, fact gathering and due diligence, corporate reviews, time spent in planning the approach to any particular transaction or project, the time we spend travelling on your behalf, the time we spend waiting in court on your behalf (including but not limited to waiting for a Judge or Master to be assigned), document drafting and preparation, negotiation and revision of documents, post completion and post closing tasks, all communications by telephone, mail, e-mail or otherwise, office conferences, legal research and office memoranda and correspondence.

In addition to our fees, our accounts will also include charges for disbursements and other expenses as outlined below.

VI. HOURLY RATES

At the commencement of our engagement we will advise you of the hourly rates of the key lawyers and personnel who will be responsible for providing the legal services to you. We may also engage other lawyers and personnel within the Firm to assist us in providing you with legal services and advice in a timely and efficient manner. Their hourly rates will be within the general range of the rates quoted for the key lawyers and personnel. Some of our lawyers have higher rates for services in areas where they have special expertise or experience, with regular rates applying in connection with other services.

Our billing rates are reviewed from time to time, and are generally revised annually to reflect levels of legal experience, changes in overhead and salary costs, and other market factors. Use of revised billing rates to set fees on any account will constitute notice to you of those revisions.

VII. PRELIMINARY FEE ESTIMATES

For most of the legal services that we provide we are only able to make a preliminary estimate of the likely amount of fees and costs. Any estimate that we provide to you is preliminary only, and should not be regarded as a maximum or fixed fee quotation, unless expressly specified as such. Fees for legal services are generally difficult to estimate because the time required, the level of complexity, the range of issues involved, the cooperativeness or otherwise of lawyers and clients on the other side of a transaction or dispute, changes in the facts or law, and many of the other factors that we take into account in setting our fees are difficult to predict in advance.

For certain relatively routine or well-defined services (for example, the incorporation of a company), we may provide you with a fixed fee estimate. When we do provide fixed fee estimates, they will be expressed in writing and specify the precise scope of the services included and the estimate of fees, disbursements and expenses.

VIII. DISBURSEMENTS AND OTHER CHARGES

Disbursements

We generally render accounts on a monthly basis for all fees, disbursements and expenses accrued during the previous month, though we may choose to render accounts on a less frequent basis, at the end of a particular matter or as we may otherwise agree in writing with you. Examples of disbursements include government agency charges, long distance telephone charges, charges levied by databases, special postage, courier and express delivery charges, printing and reproduction charges, transcript charges, witness fees, registry fees including fees charged by court registries, corporate registries, land title registries and others, filing and search fees, agent's fees, travel expenses (including travel mileage where personal vehicles are used), fees payable to outside experts and consultants including accountants, appraisers and legal counsel in other jurisdictions.

In jurisdictions where the Law Society imposes a trust administration fee in relation to receipt of trust funds by a law firm, Lawson Lundell LLP will pay that fee where applicable. The amount paid will then appear on your account as a disbursement.

In particular cases, where a disbursement of a significant amount is required (for example, a large fee for an expert report), you may be asked to provide us with funding in

advance, or you may be asked to make direct payment of the fee or charge.

We may conduct searches on fee-based databases when performing work on your matter. Whether we pay for access to such databases on a transactional or flat-rate basis, you will be invoiced for the transactional amount attributed to searches made on your behalf by the database provider.

Other Charges

During the course of providing legal services to you, we also incur, and you hereby agree to be charged, for certain costs or expenses arising from use of internal resources. These expenses include paralegal time, internal photocopying and printing costs, word processing and fax transmissions. We also charge, and you agree to pay, for staff overtime where it is reasonably necessary for paralegals, legal assistants or other staff to work outside of regular office hours in order to provide you with timely legal advice or services or to meet deadlines.

Our charges for expenses will be reflected in our accounts. If you wish we can provide you with our charge rates for these expenses in advance at any time.

IX. BILLING AND PAYMENT

We generally render accounts on a monthly basis for all fees, disbursements and expenses accrued during the previous month, although we may choose to render accounts on a less frequent basis, at the end of a particular matter, or as we otherwise may agree in writing with you. Our accounts will also include charges for goods and services taxes (GST/HST) and provincial sales tax (PST) that we are required by law to collect and remit. If you are a non-resident of Canada or of British Columbia, these taxes may not be applicable to your account; you should advise us immediately if this is the case.

The rate of GST/HST that we will charge on our services will initially be based on the jurisdiction of the place of supply set out in our Engagement Letter, which you will confirm by executing the Engagement Letter. If no place of supply is set out in the Engagement Letter, we will, subject to any special place of supply rules under the Regulations to the *Excise Tax Act*, initially charge the rate of GST/HST applicable to the supply of our services based on the location of your address provided on page 1 of our Engagement Letter.

As place of supply is not a static concept, we may have to change the place of supply as circumstances change, or as we acquire additional information that impacts the place of supply.

In the event that Canada Revenue Agency determines that the place of supply of our services is different than that applied to any account we render to you, you agree to indemnify Lawson Lundell LLP against any assessment of additional GST/HST payable as a result of such determination plus any consequential interest and penalties.

If you are resident in B.C. or carry on business in B.C., we are required to charge PST on our services. If you are not a resident of B.C. and do not carry on business in that province, we will be required to charge PST on our services where they relate to one or more of the following: a) real property located in B.C.; b) litigation to be conducted in B.C.; c) tangible personal property located or to be located in B.C.; or the incorporation of a company or society in B.C.

Payment is due when the account is issued. By entering into this Engagement Agreement, you agree to make prompt payment of our accounts. We charge interest at the rate of 12% per annum on any accounts not paid within 30 days of the date of the account and you hereby agree to pay interest at that rate when your account remains unpaid after 30 days. We will give you prompt notice if any of your accounts remain unpaid. By entering into this Engagement Agreement, you agree to make prompt payment of the account.

X. RETAINERS

We will require you to pay to us, to be held in trust, a retainer amount as set out in the Engagement Letter. Pursuant to the Engagement Letter, the retainer will either be held in trust until your final account is rendered, and will be applied to that final account, or the retainer will be applied to your first account. In the latter case, you will be required to refresh the retainer from time to time as accounts are rendered. In either case, we reserve the right to require an increase in the retainer amount.

XI. TRUST ACCOUNTS

We will deposit all trust deposits we receive from you, including retainers, in a trust account. Your deposit will be placed in a pooled account unless you request a segregated account. If you are uncertain as to the effect of a pooled or segregated account, please discuss this with us at the time of deposit. Under legislation governing the legal profession in each province and territory, interest earned in pooled trust accounts is generally payable to a Law Foundation. Subject to agreement to the contrary, interest earned on a segregated trust account will be added to the deposit for your benefit and will be included in your taxable income. Unless otherwise instructed in writing, we will place your trust funds in a Canadian dollar trust account. Please note that only the first $100,000 of your trust funds in a Canadian dollar account in a permitted financial institution are insured by Canadian Deposit Insurance Corporation (CDIC) legislation. If you instruct us to deposit your trust funds in a foreign currency account, or make such a deposit yourself, those funds will not be insured by CDIC. By entering into this Engagement with us, you acknowledge that we have advised you of these facts.

XII. USE OF DATA ROOMS AND APPLICATION OF THE U.S.A. *PATRIOT ACT*

In accordance with your instructions, we may arrange for data belonging or relating to you (which may include your privileged and/or confidential data) to be stored in electronic "data rooms", "deal rooms" or other Internet-accessible locations to which you and/or other specified persons may have access. In all cases (including our Lawson Lundell LLP-branded electronic data rooms and deal rooms) these services are provided by third party service providers. We advise, and you acknowledge and agree, that the servers on which the data is maintained may be located, or controlled by an entity incorporated in, the United States of America and, as such, may be subject to a U.S. federal statute, the *USA PATRIOT Act*. That Act expands law enforcement agencies' access to confidential data in the interests of U.S. national security. Accordingly, agencies of the U.S. government may be entitled to access data belonging or relating to you from such U.S. servers and there may be no obligation to notify you or us of such access.

XIII. CONFLICTS

Before accepting an engagement to provide legal services, we conduct an internal conflict check to identify any potential conflicts with existing or former client interests. If our conflict checks identify an existing conflict, we may be unable to accept the engagement. Alternatively, we may only be able to accept the engagement on obtaining consent from you and the other affected client or former client. If potential conflicts are identified that might arise in the future, we are required to either decline or withdraw from the engagement or to obtain your informed consent to proceed. If a conflict is discovered or arises after we have started to provide you with legal services, we may be unable to continue to provide you with legal services in that particular matter. In that case, we will notify you and all other clients affected and may withdraw from the matter in a manner consistent with the applicable Code of Professional Conduct or other professional rules. We will help you to retain other counsel and will try to make a smooth transfer of appropriate file materials and information, subject to payment of our accounts.

XIV. TERMINATION

You may terminate our representation at any time, with or without cause, by notifying us. If our accounts are not paid in full at the time of termination, we reserve the right to assert a solicitors' lien over the contents of your file, subject to the applicable rules of professional conduct. Our own files pertaining to the case will be retained. You will be responsible for payment of all fees, expenses and disbursements for work performed to the date of the termination and in connection with an orderly transition of the matter.

We are subject to the codes of professional responsibility for the jurisdictions in which we practice. These codes list several types of conduct or circumstances that require or allow us to withdraw from representing a client, including for example: non-payment of fees or costs; misrepresentation or failure to disclose material facts; action contrary to our advice; serious loss of confidence between lawyer and client; and conflict of interest with another client. We try to identify in advance and discuss with our client any situation that may lead to our withdrawal and if withdrawal ever becomes necessary, we immediately give you written notice of our withdrawal.

XV. FEE REVIEWS

If you have any questions or concerns respecting our accounts, please feel free to discuss the issues with the primary contact lawyer or with our Managing Partner. We are generally able to resolve any concerns relating to our accounts to the satisfaction of both sides, with little inconvenience or formality. In the event that we are not able to resolve any concerns or issues respecting our accounts, you have the right (subject to time limits) to request a review or taxation of the account before an officer of the Supreme Court or Court of Queen's Bench in the appropriate province or territory. We would be pleased to advise you respecting your rights of review and we will participate fully in that process as necessary.

XVI. REFERENCES

From time to time we find it necessary or desirable to provide a list of representative clients to others, or to indicate the range of services we provide and the range of clients to whom we provide them. For example, other clients or potential clients may ask for this information, or we may be asked to provide it to legal directories that feature the firm or its lawyers. The professional codes to which some of our lawyers are subject may require that we obtain the consent of our clients before disclosing that we have acted for them. By entering into this Engagement Agreement, you authorize us to disclose that we have provided legal services to you and the general nature of those services, provided that we maintain the confidentiality of all other confidential information pertaining to you.

XVII. AUDIT ENQUIRIES

We may be required, from time to time, to respond to audit enquiries directed to us by your auditor pursuant to the Joint Policy Statement on Audit Enquiry and Response (incorporated into the Canadian Institute of Chartered Accountants Handbook).

You authorize us to respond to these audit enquiries in compliance with the Joint Policy and agree to pay our reasonable fees, disbursements and expenses for preparing and delivering a response. You agree to provide us with the necessary information in order to provide a response in a timely fashion when requested to do so.

XVIII. DURATION OF REPRESENTATION

Where we have been engaged to act or provide advice on a specific matter, our engagement with respect to that matter

will terminate on the completion of such action or the provision of such advice.

XIX. KNOWLEDGE MANAGEMENT

As part of our commitment to providing cost-effective legal services to our clients, we maintain an internal knowledge management database. In that database, we index materials such as precedents and examples of materials used in transactional and litigation matters along with legal research opinions and memos (with appropriate measures taken to ensure compliance with overriding ethical obligations and constraints imposed by conflict resolution measures). By consulting the database, lawyers, students and paralegals are able to take advantage of the knowledge and drafting expertise of their colleagues to your benefit. On entering into this engagement agreement, you acknowledge and agree that materials prepared in the course of our work for you may be placed in the internal Lawson Lundell knowledge management database and consulted by our lawyers, students and paralegals in the course of their work for you and other firm clients.

XX. RECORDS RETENTION AND DESTRUCTION POLICY

Under our Record Retention and Destruction Policy, we close client files pertaining to a particular matter within one year of the matter becoming inactive. We do not store material in a client file that belongs to the client once a matter has been closed. Any material in the file that belongs to you will be returned to you upon file closing as well as any original documents. The types of materials that belong to the client include: original documents in existence before the retainer; original correspondence from the lawyer or third parties; expert reports; client medical records; examination for discovery transcripts; trial transcripts; notes or recordings of conversations with witnesses or officers of the court; documents for use in court; memoranda of law; originals, copies and drafts of wills, powers of attorney, representation agreements and contracts; receipts for disbursements; and corporate seals.

We will retain and store any non-client material (which may include copies of the client documents) as we choose for a period of 17 years, after which we have the discretion to destroy what remains of the file without further notice to you.

If you have questions about our Record Retention and Destruction Policy, please contact our Managing Partner.

S-246230



No. _____
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INTRACORP VANNESS LIMITED PARTNERSHIP

PLAINTIFF

AND:

THE OWNERS, STRATA PLAN LMS992, and CROWE MACKAY & COMPANY LTD., AS LIQUIDATOR OF THE OWNERS, STRATA PLAN LMS992

DEFENDANTS

NOTICE OF CIVIL CLAIM

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

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

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

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

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

(a) file a response to civil claim in Form 2 and a counterclaim in Form 3 in the above-named registry of this court within the time for response to civil claim described below, and

(b) serve a copy of the filed response to civil claim and counterclaim on the plaintiff and on any new parties named in the counterclaim.

This is Exhibit " B " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026.

A Commissioner for taking Affidavits for British Columbia.

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

Time for response to civil claim

A response to civil claim must be filed and served on the plaintiffs,

(a) if you were served with the notice of civil claim anywhere in Canada, within 21 days after that service,

(b) if you were served with the notice of civil claim anywhere in the United States of America, within 35 days after that service,

(c) if you were served with the notice of civil claim anywhere else, within 49 days after that service, or

(d) if the time for response to notice of civil claim has been set by order of the court, within that time.

CLAIM OF THE PLAINTIFF

Part 1: STATEMENT OF FACTS

Overview

1. The Plaintiff is the purchaser under a Purchase and Sale Agreement dated January 11, 2021, as amended from time to time (collectively, the "**Agreement**") respecting the sale of certain land and buildings located at 3362, 3364, 3366, 3368, 3370, 3372, 3374, 3376, 3378, 3380, 3382 and 3384 Vanness Avenue, Vancouver, British Columbia (the "**Property**") made in the context of a voluntary liquidation and winding up of The Owners, Strata Plan LMS992 (the "**Vendor**" or the "**Strata Corporation**"), with Crowe MacKay & Company Ltd. as liquidator (the "**Liquidator**").

2. Pursuant to the Agreement, the Plaintiff and the Liquidator agreed on a closing date of September 9, 2024 (the "**Closing Date**").

3. The Agreement imposes obligations on the Vendor to maintain and repair the Property to the same condition as on the date of the Agreement.

4. In breach of the Agreement, the Vendor has failed to keep the Property's fire alarm system and townhouses on the Property in the same condition as on the date of the Agreement.

5. The Agreement also contains a representation by the Vendor that, as at the date of the Agreement and continuing through to closing, there is no pending or threatened claim, litigation, or proceeding before any court, tribunal, or government agency that pertains to the Property.

6. The Vendor has been subject to several work orders from the Provincial Court of British Columbia, both prior and subsequent to the date of the Agreement, to remediate unsafe building conditions on the Property, the most recent of which was issued on or around November 30, 2023, and with which the Vendor has not complied and will not comply.

7. In spite of the foregoing, the Plaintiff intends to proceed with closing on the Closing Date, subject to the Plaintiff reserving all rights and remedies against the Vendor for breaches of the Agreement.

8. The Property remains occupied by existing owners and tenants of the Property's strata lots (the "**Occupants**") who, under the Agreement, may remain in possession of their strata lot for up to twelve months after the Closing Date (in the case of owners), or until the owner is entitled to terminate the tenancy agreement (in the case of tenants).

9. The Property, and in particular the townhouses, require extensive work, to ensure that the Property is safe for the Occupants to remain in their strata lots, as

permitted under the Agreement. The Vendor has not undertaken this necessary repair work despite multiple remediation orders and court orders.

The Parties

10. The Plaintiff, Intracorp Vanness Limited Partnership (the "**Plaintiff**" or "**Intracorp**"), is a limited partnership formed pursuant to the laws of the Province of British Columbia with an address for service in this proceeding at 2200 – 885 West Georgia Street, Vancouver, British Columbia, Canada, V6C 3E8.

11. The Defendant Strata Corporation is a strata corporation incorporated pursuant to the *Strata Property Act*, S.B.C. 1998, c. 43 with an address for service care of 1600 - 925 West Georgia Street, Vancouver, British Columbia, Canada, V6C 3L2.

12. The Defendant Liquidator is named in its capacity as liquidator of the Defendant Strata Corporation.

Background

13. On or about January 11, 2021, Intracorp Acquisition Co. Ltd. and the Vendor entered into the Agreement for the purchase of the Property.

14. On or about August 21, 2021, Intracorp Acquisition Co. Ltd. assigned, transferred, and conveyed to the Plaintiff its right, title, and interest in and to the Agreement and the Property pursuant to an Assignment Agreement.

15. The Agreement was subject to Court approval pursuant to the liquidation and winding up provisions of the *Strata Property Act*.

16. On October 19, 2022, on application of the Strata Corporation to this Court, Justice Marzari granted an order approving the Agreement, confirming the Strata Corporation's liquidation and winding up, and appointing the Liquidator.

17. The Property is a mixed-use strata development comprised of fifty-two (52) residential strata lots located in a 12-storey tower (the "**Tower**"), eight (8)

townhouse strata lots (the "**Townhouses**"), and three non-residential strata lots located at the ground floor of the Tower.

18. The Plaintiff intends to redevelop the Property.

19. Residential units in the Tower and the some of the Townhouses remain occupied by the Occupants.

Terms of the Agreement

20. Section 1(e) of Schedule C to the Agreement contains the following representation by the Vendor, which the Vendor represented and warranted was true when the parties entered into Agreement, would remain true at the time of completion, and will continue and survive the Plaintiff's purchase of the property [emphasis added]:

> *to the best of the Vendor's knowledge, there is no claim, litigation or proceeding, pending or threatened, by or before any court, government agency, commission, department, board, officer or other authority having jurisdiction that pertains in any manner to the Property or the right of the Purchaser to own the Property or to receive benefits therefrom;*

21. Section 2 of Schedule C to the Agreement contains the Vendor's covenants. In particular, in section 2(a), the Vendor covenants and agrees as follows [emphasis added]:

> *From and after the date of this Agreement, the Vendor will cause the Property to be kept, repaired, and maintained to substantially the same condition and state of repair as of the date of this Agreement and to be insured at the Vendor's cost and expense so that on the Completion Date, the Purchaser will acquire the Property in substantially the same condition and state of repair as of the date of this Agreement, subject to reasonable wear and tear and save as otherwise provided for herein.*

22. Section 10 of the Agreement provides that the Property will be and remain at the Vendor's risk until a transfer, as defined within the Agreement, is filed for registration with the Land Title Office.

23. Section 14(b) of the Agreement provides that an owner of a residential strata lot within the Property may remain in possession of their respective lot for up to twelve months after the Closing Date.

The Vendor's Breaches

24. In breach of its covenants under section 2(a) of Schedule C, the Vendor has failed to maintain the Property's condition by failing, among other things, to:

    (a) keep the fire alarm system in working order, to the point that the Property's annunciator panel is no longer working and/or no is no longer connected to local fire services, posing a health and safety risk for residents of the Tower. While the Vendor was working on fixing the fire alarm system up to the Closing Date, as of the time of filing this Notice of Civil Claim, the Plaintiff has not received confirmation that the fire alarm system is once again operational and has passed inspection; and

    (b) maintain and repair the Townhouses, such that they have fallen into further disrepair and may pose health and safety risks to their Occupants.

    (together, the "**Maintenance Breaches**").

25. On or around October 7, 2019, and November 18, 2019, the Vendor received orders from the City of Vancouver requiring the Vendor to install shoring to make the Property's townhouses safe for occupancy, contrary to the Vendor's representations in section 1(e) of Schedule C.

26. Thereafter, the Vendor was the subject of the following Provincial Court of British Columbia orders respecting the Townhouses, all of which the Vendor failed to comply with:

    (a) An order, issued on December 11, 2020, pursuant to a guilty plea by the Vendor, requiring the Vendor to complete remediation work to correct unsafe building conditions by or before January 31, 2021 (the "**December 2020 Order**");

    (b) An order, issued on April 5, 2023, pursuant to a guilty plea by the Vendor for breaching the December 2020 Order, requiring the Vendor to take

certain steps towards remediating the unsafe building conditions by or before December 31, 2023 (the **April 2023 Order**"); and

(c) An order, issued on November 30, 2023, pursuant to the Vendor's application, extending the deadline for compliance with the April 2023 Order to September 30, 2024 (the "**November 2023 Order**")

(together, the "**Court Orders**").

27. The Vendor has not and will not comply with November 2023 Order prior to the Closing Date, and the Vendor will remain subject the Court Orders on the Closing Date, contrary to section 2(a) of Schedule C of the Agreement.

28. On or shortly after the Closing Date, the Liquidator acting on behalf of the Vendor intends to distribute the sales proceeds to the strata lot owners of the Strata Corporation.

29. The Vendor's breaches of the Agreement have, and will continue to cause, the Plaintiff loss and damage for which the Vendor is liable.

Part 2: RELIEF SOUGHT

30. The Plaintiff seeks the following relief:

(a) damages for breach of contract by the Vendor;

(b) an interim and interlocutory order requiring the Liquidator, through its counsel, to hold back $525,000, or such other reasonable amount as this court orders, from the sales proceeds pending final disposition of the Plaintiff's claim or further court order;

(c) interest pursuant to the *Court Order Interest Act*;

(d) costs; and

(e) such further and other relief as this Honourable Court may deem just and appropriate.

Part 3: LEGAL BASIS

31. The Plaintiff relies on the common law of contract and negligent misrepresentation.

32. The Plaintiff reasonably relied on the Vendor's representations, warranties, and covenants set out within the Agreement.

33. The Plaintiff has, at all material times, complied with the terms of the Agreement.

34. The Vendor has breached the Agreement, including by:

(a) committing the Maintenance Breaches, contrary to section 2(a) of Schedule C to the Agreement; and

(b) making negligent misrepresentations respecting the Court Orders, allowing the Property to be subject to the Court Orders, and failing to correct such misrepresentations by complying with the Court Orders, contrary to section 1(e) of Schedule C to the Agreement.

35. As a result of the Vendor's breaches of the Agreement, the Plaintiff will suffer damages, including among other things:

(a) increased costs and expenses for repairs necessary to ensure the Property is safe for occupancy by the Occupants, which are a result of the Maintenance Breaches;

(b) increased costs and expenses to remediate the Property to comply with the Court Orders; and

(c) potential liability flowing from the Vendor's failure to comply with the Court Orders, which the Plaintiff will be exposed to as the purchaser of the Property.

36. The Plaintiff also pleads and relies on:

(a) the *Court Order Interest Act*, R.S.B.C. 1996, c. 79;

(b) the *Strata Property Act*, S.B.C. 1998, c. 43; and

(c) the *Business Corporations Act*, S.B.C. 2002, c. 57

Plaintiff's address for service:	Cassels Brock & Blackwell LLP Suite 2200, RBC Place 885 West Georgia Street Vancouver, BC V6C 3E8 **Attention:** **Jordanna Cytrynbaum / Rajit Mittal**
Fax number for service (if any):	N/A
Email address for service (if any):	jcytrynbaum@cassels.com and rmittal@cassels.com
Place of trial:	Vancouver
The address of the registry is:	800 Smithe Street Vancouver, BC V6Z 2E1
Dated: 9/September/2024	**Signature of lawyer for the Plaintiff** **Jordanna Cytrynbaum / Rajit Mittal**

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

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

(a) prepare a list of documents in Form 22 that lists

(i) all documents that are or have been in the party's possession or control and that could, if available, be used by any party at trial to prove or disprove a material fact, and

(ii) all other documents to which the party intends to refer at trial, and

(b) serve the list on all parties of record.

APPENDIX

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

Part 1: CONCISE SUMMARY OF NATURE OF CLAIM:

Claim for breach of contract.

Part 2: THIS CLAIM ARISES FROM THE FOLLOWING:

A personal injury arising out of:

☐ a motor vehicle accident

☐ medical malpractice

x another cause

A dispute concerning:

☐ contaminated sites

☐ construction defects

x real property (real estate)

☐ personal property

☐ the provision of goods and services or other general commercial matters

☐ investment losses

☐ the lending of money

☐ an employment relationship

☐ a will or other issues concerning the probate of an estate

☐ a matter not listed here

Part 3: THIS CLAIM INVOLVES:

☐ a class action

☐ maritime law

☐ aboriginal law

☐ constitutional law

☐ conflicts of law

x none of the above

☐ do not know

Part 4:

VANCOUVER REGISTRY SEP 09 2024

S-246230

No._____
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN

INTRACORP VANNESS LIMITED PARTNERSHIP

PLAINTIFF

AND

THE OWNERS, STRATA PLAN LMS992, and CROWE MACKAY & COMPANY LTD., AS LIQUIDATOR OF THE OWNERS, STRATA PLAN LMS992

DEFENDANTS

NOTICE OF APPLICATION

Name of Applicant: The Plaintiff, Intracorp Vanness Limited Partnership

To: The Defendant, The Owners, Strata Plan LMS992 and Crowe Mackay & Company Ltd. as Liquidator of the Owners, Strata Plan LMS992

TAKE NOTICE that an application will be made by the applicant to the presiding Judge at the courthouse at 800 Smithe Street, Vancouver, British Columbia on September 9, 2024, at 9:45 a.m. for the orders set out in Part 1 below.

The Applicant estimates that the application will take 30 minutes.

☐ This matter is within the jurisdiction of an Associate Judge.

☒ This matter is not within the jurisdiction of an Associate Judge.

This is Exhibit " C " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026.

A Commissioner for taking Affidavits for British Columbia.

Part 1: ORDERS SOUGHT

1. An order that the Liquidator (as defined herein) hold back $525,000 from the proceeds of the sale of the Respondent's land and buildings located at 3362, 3364, 3366, 3368, 3370, 3372, 3374, 3376, 3378, 3380, 3382 and 3384 Vanness Avenue, Vancouver, British Columbia after closing of the sale and maintain those funds in trust with its counsel:

    a. *Until the earlier of:*

        i. final disposition of the Plaintiff's within claim or further order of this court; or

        ii. the Vendor fixing the fire alarm system such that it is connected to the local fire service and is approved by an inspection with no deficiencies, and complying with the Court Orders (as defined below) in respect of the Townhouses

    or, in the alternative

    b. Until September 30, 2024 (the "**Return Date**") unless this order is varied or discharged by a further order of this court. The application in which this order is made shall come back to the court for further hearing on or before the Return Date; and

    c. Anyone affected by the order may apply to the court at any time to vary or discharge it on giving no less than five (5) business days' notice to the Plaintiff's solicitor of their intention to do so, but the order will remain in force until further order of this court even if such an application is pending.

2. Costs.

3. Such further and other relief as counsel may advise and this honourable court sees fit to order.

Part 2: FACTUAL BASIS

Overview of Claim

4. The Plaintiff and the Defendant, The Owners Strata Plan LMS992 (the "**Vendor**" or the "**Strata Corporation**") are parties to a Purchase and Sale Agreement dated January 11, 2021, as amended from time to time (collectively, the "**Agreement**"), respecting the sale of certain land and buildings located at 3362, 3364, 3366, 3368, 3370, 3372, 3374, 3376, 3378, 3380, 3382 and 3384 Vanness Avenue, Vancouver, British Columbia (the "**Property**") made in the context of the Strata Corporation's voluntary liquidation and winding-up, with Crowe MacKay & Company Ltd. as liquidator (the "**Liquidator**").

5. The sale of the Property is set to close on September 9, 2024 (the "**Closing Date**").

6. The Agreement contains covenants by the Vendor to maintain and repair the Property to the same condition as on the date of the Agreement. The Plaintiff alleges that in breach of the Agreement, the Vendor has, among other things, failed to keep the Property's fire

alarm system in working order and failed to keep the townhouses on the Property in the same condition as on the date of the Agreement.

7. The Agreement also contains a representation by the Vendor that, to the best of the Vendor's knowledge, there is no pending or threatened claim, litigation, or proceeding by or before, *inter alia,* any court, tribunal, or government agency that pertains to the Property.

8. Contrary to this representation, which the Vendor represented and warranted was true when the parties entered into the Agreement and would remain true at the time of completion, the Vendor has been subject to several work orders from the City of Vancouver and the Provincial Court of British Columbia to remediate unsafe building conditions. This includes orders prior and subsequent to the date of the Agreement, which the Vendor had not complied with at the time of the Agreement and still has not complied with. The Vendor has provided no assurances that it will in fact comply with the orders.

9. The Property remains occupied by existing owners and tenants of the Property's strata lots (the "**Occupants**") who, under the Agreement, may remain in possession of their strata lot for up to twelve months after the Closing Date (in the case of owners), or until the owner is entitled to terminate the tenancy agreement (in the case of tenants).

10. The Property, and particularly the townhouses on the Property, require extensive repair work ordered by the Provincial Court necessary to ensure that the Property is safe for the Occupants to remain in their strata lots after the Closing Date.

11. The Vendor's breaches of the Agreement are serious and include: failing to maintain the condition of the Property, making misrepresentations respecting the outstanding work orders against the Vendor, allowing continual orders to be issued by the Provincial Court against the Vendor in respect of the unsafe condition of the Property, and failing to abide by those orders.

12. Notwithstanding those breaches, the Plaintiff intends to proceed with closing on the Closing Date, subject to the Plaintiff reserving all rights and remedies against the Vendor for breaches of the Agreement.

13. Upon closing, the Liquidator intends to disburse the sales proceeds to the Strata Corporation's strata lot owners despite the Plaintiff's claim. Despite its obligation to treat all parties fairly, including potential creditors, the Liquidator has refused to hold back limited funds from the $41,400,000 purchase price even temporarily to allow the Plaintiff to bring this application in an orderly way.

The Background

14. On or about January 11, 2021, Intracorp Acquisition Co. Ltd. and the Vendor entered into the Agreement for the purchase of the Property.

15. On or about August 21, 2021, Intracorp Acquisition Co. Ltd. assigned, transferred, and conveyed to the Plaintiff its right, title, and interest in and to the Agreement and the Property pursuant to an Assignment Agreement.

16. The Agreement was subject to court approval pursuant to the liquidation and winding up provisions of the *Strata Property Act,* S.B.C. 1998, c. 43 ("***SPA***").

17. On October 19, 2022, on application of the Strata Corporation to this Court, Justice Marzari granted an order approving the Agreement, confirming the Strata Corporation's liquidation and winding up, and appointing the Liquidator.

18. The Property is a mixed-use strata development comprised of fifty-two (52) residential strata lots located in a 12-storey tower (the "**Tower**"), eight (8) townhouse strata lots (the "**Townhouses**"), and three non-residential strata lots located at the ground floor of the Tower.

19. The Plaintiff intends to redevelop the Property.

20. Residential units in the Tower and the some of the Townhouses remain occupied by the Occupants and will remain occupied after the Closing Date.

Relevant Provisions of the Agreement

21. Section 1(e) of Schedule C to the Agreement contains the following representation by the Vendor, which the Vendor represented and warranted was true when the parties entered into Agreement, would remain true at the time of completion, and will continue and survive the Plaintiff's purchase of the property [emphasis added]:

> *to the best of the Vendor's knowledge, there is no claim, litigation or proceeding, pending or threatened, by or before any court, government agency, commission, department, board, officer or other authority having jurisdiction that pertains in any manner to the Property or the right of the Purchaser to own the Property or to receive benefits therefrom;*

22. Section 2 of Schedule C to the Agreement contains the Vendor's covenants. In particular, in section 2(a), the Vendor covenants and agrees as follows [emphasis added]:

> *From and after the date of this Agreement, the Vendor will cause the Property to be kept, repaired, and maintained to substantially the same condition and state of repair as of the date of this Agreement and to be insured at the Vendor's cost and expense so that on the Completion Date, the Purchaser will acquire the Property in substantially the same condition and state of repair as of the date of this Agreement, subject to reasonable wear and tear and save as otherwise provided for herein.*

Breaches of the Agreement

23. The Plaintiff alleges that the Vendor has failed to maintain the Property in the same condition as at the time of the Agreement by failing, among other things, keep the fire alarm system in working order and maintain and repair the Townhouses, such that they have fallen into further disrepair and may pose health and safety risks to their Occupants, contrary to section 2(a) of Schedule C of the Agreement.

24. While the Vendor was working on fixing the fire alarm system up to the Closing Date, as of the time of filing this application, the Plaintiff has not received confirmation that the fire alarm system is once again operational and has passed inspection.

25. Further, contrary to the Vendor's representations in section 1(e) of Schedule C, on or around October 7, 2019, and November 18, 2019, the Vendor received orders from the City of Vancouver requiring the Vendor to take steps to remedy the unsafe condition of the Townhouses. The Agreement is dated January 11, 2021.

26. Thereafter, the Vendor was the subject of the following Provincial Court of British Columbia orders respecting the Townhouses:

    a. An order, issued on December 11, 2020, pursuant to a guilty plea by the Vendor, requiring the Vendor to complete remediation work to correct unsafe building conditions by or before January 31, 2021 (the "**December 2020 Order**");

    b. An order, issued on April 5, 2023, pursuant to a guilty plea by the Vendor for breaching the December 2020 Order, requiring the Vendor to take certain steps towards remediating the unsafe building conditions by or before December 31, 2023 (the "**April 2023 Order**"); and

    c. An order, issued on November 30, 2023, pursuant to the Vendor's application, extending the deadline for compliance with the April 2023 Order to September 30, 2024 (the "**November 2023 Order**")

    (together, the "**Court Orders**").

27. The Vendor has neither complied with nor provided assurances that it will comply with the Court Orders.

28. In response to the Vendor's breaches, the Plaintiff commenced on claim on September 9, 2024, seeking damages against the Vendor for breach of contract. At this stage, the Plaintiff expects its losses to be at least $525,000.

29. On or shortly after the Closing Date, the Liquidator intends to distribute the sales proceeds (the "**Proceeds**") to the strata lot owners of the Strata Corporation. The Liquidator has refused a proposal from the Plaintiff to voluntarily hold back some funds until disposition of the Plaintiff's claim or, at the very least, until September 30, 2024, to allow the Plaintiff time to bring this application in an orderly way.

30. The Plaintiff's application is supported by a Critical System Assessment report obtained by the Plaintiff in respect of the Property dated September 4, 2024, and an affidavit from a representative of the Plaintiff who is familiar with the Property and the Agreement.

Part 3: LEGAL BASIS

The Orders Sought are within this Court's Jurisdiction and Justified in the Circumstances

31. Pursuant to the provisions of the *SPA* and the *Business Corporations Act*, S.B.C. 2002, c. 57 ("***BCA***"), this Court has broad jurisdiction order that the Liquidator retain funds from the Proceeds to satisfy a damages award.

32. Pursuant to section 276 of the *SPA*, the provisions of the *BCA* that apply to a voluntary liquidation of a company apply to the voluntary winding up of a strata corporation with a liquidator, except for Division 10 of Part 10 and section 324 of the *BCA*.

***Strata Property Act*, S.B.C. 1998, c. 43**, s. 276(1-2).

***The Owners, Strata Plan VR2702 (Re)*, 2018 BCSC 390** at paras. 87-89

33. Any person whom this Court considers to be an appropriate person to make the application may bring an application under section 325 of the *BCA* in respect of a corporation in liquidation.

***Business Corporations Act*, S.B.C. 2002, c. 57**, s. 325(1)

34. Section 325 of the *BCA*, incorporated into the winding-up process for a strata corporation with a liquidator through section 276 of the *SPA*, "allows for applications to be made to the court in a winding-up proceeding by anyone the court considers appropriate and confers broad powers on the court to make orders and give directions as the court considers appropriate."

The Owners, Strata Plan VR2702 (Re), 2018 BCSC 390 at para. 88

35. Section 325 of the *BCA* provides an avenue for addressing "any confusion or uncertainty that may arise in the course of the winding-up process" for a strata corporation.

The Owners, Strata Plan VR2702 (Re), 2018 BCSC 390 at para. 90

36. On an application under section 325 of the *BCA*, this Court may make any order it considers appropriate, including:

"(m) an order

(i) approving the payment, satisfaction or compromise of any or all of the liabilities of the company and the retention of assets for that purpose, or

(ii) determining the adequacy of provisions for the payment or discharge of the liabilities of the company;"

"(o) an order giving directions on any matter arising in a liquidation;" and

"(t) subject to the obligation of the liquidator under section 330 (m) to pay or provide for the company's liabilities and the costs, charges and expenses incurred in the liquidation, an order approving any proposed interim or final distribution in money or other assets to shareholders."

***Business Corporations Act*, S.B.C. 2002, c. 57**,
ss. 325(3)(m), 325(3)(o), 325(3)(t);

see also ***Masala Bites Enterprises Ltd. v. Sohal***, 2018 BCSC 1 at para. 58

37. The Strata Corporation is undergoing a winding-up process. Further to the Winding Up Order, the Property will be surrendered to and vested in the Liquidator, subject to the mortgages, assignments of rent, and other charges registered on the title to the Property immediately before title to the Property is to be transferred to the Plaintiff.

38. Further to the Winding Up Order, the Liquidator shall pay out or deal with the Proceeds of the sale by:

    a. Firstly, by making and paying out adjustments;

    b. Secondly, by paying any legal fees incurred by the Respondent or the Liquidator in relation to the winding up; and

    c. Thirdly, by distributing the remaining amount rateably among the strata unit owners.

39. If, in the course of the winding-up process, the Liquidator distributes all of the Proceeds after the Closing Date and before the claim is determined, the Liquidator will have effectively placed the funds sufficient to satisfy a judgment against the Vendor beyond the Plaintiff's reach.

40. The potential prejudice to the Plaintiff from having an unenforceable award against a wound up and dissolved strata corporation outweighs any potential prejudice to the individual strata lot owners of the sixty-three strata lots from a delay in distribution of the requested $525,000 hold back if the Vendor succeeds in its defence of the claim.

41. The order sought is reasonable given this Court's broad powers under section 276 of the *SPA* and section 325 of the *BCA* to approve the retention of assets to satisfy the Respondent's liabilities, approve any proposed interim distribution in money to the strata unit owners, and give directions on any matter arising in the winding-up.

The Orders Align with a Liquidator's Duties

42. A liquidator is "an officer of the court whose function it is to close up the company's business and distribute its assets to its creditors" and "an independent, objective, and experienced person" to liquidate and dissolve the corporation.

Coopérants (Les), Société mutuelle d'assurance-vie (Liquidateur de) c. Dubois, 1996 CanLII 242 (SCC), [1996] 1 SCR 900 at para. 34; ***Masala Bites Enterprises Ltd. v. Sohal***, 2018 BCSC 1 at para. 57

43. A liquidator's duties include:

> "(d) subject to this part [of the *BCA*], use the liquidator's own discretion in realizing the assets of the company or distributing those assets among the creditors and shareholders of the company," and
>
> "(i) if at any time the liquidator determines that the company is unable to pay or provide for the discharge of its liabilities, promptly apply to the court to
>
> (i) stay any proceedings taken under this Part, and

(ii) seek directions," and

"(l) dispose of the assets of the company, other than assets that are to be distributed in kind to the company's shareholders, and pay or make provision for all of the company's liabilities"

***Business Corporations Act*, S.B.C. 2002, c. 57,**
ss. 330(d), 330(i), 330(l)

44. Similarly, section 8(d) of the Winding Up Order requires the Liquidator to deal with any creditors of the Strata Corporation, including the payment, compromise, or settlement of any claims by those creditors.

45. The order sought is reasonable given the Liquidator's duties under the *BCA* to make provision for all the Strata Corporation's liabilities and to stay any Liquidation proceedings and seek directions if the Liquidator determines that the Strata Corporation cannot provide for the discharge of its liabilities.

Conclusion

46. Based on the above legal principles and the Vendor's status as a strata corporation undergoing a winding up with the Liquidator pursuant to Part 16 of the *SPA*, the Plaintiff submits that an order that the Liquidator retain $525,000 from the Proceeds after closing of the sale for the Plaintiff's claim is appropriate and necessary in the circumstances.

Part 4: MATERIAL TO BE RELIED ON

47. Affidavit of Evan Allegretto made September 8, 2024.

48. Affidavit of Michelle Hsieh made September 9, 2024.

49. The pleadings filed herein.

50. Such further and other materials as counsel may advise.

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

file an application response in Form 33,

file the original of every affidavit, and of every other document, that

you intend to refer to at the hearing of this application, and

has not already been filed in the proceeding, and

serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:

a copy of the filed application response;

a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on that person;

if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7(9).

Date: September 9, 2024

Signature of Lawyer for applicants
Jordanna Cytrynbaum, Rajit Mittal

THIS NOTICE OF APPLICATION was prepared by **Jordanna Cytrynbaum and Rajit Mittal**, of the firm of Cassels Brock & Blackwell LLP, Lawyers, whose place of business and address for delivery is 2200 - 885 West Georgia Street, Vancouver BC V6E 3C8, Telephone: (604) 691-6100.

To be completed by the Court only:
Order made

☐ in the terms requested in paragraphs _____ of Part 1 of this notice of application

☐ with the following variations and additional terms:

_____

_____

_____

Date: _____ _____

Signature of ☐ Judge ☐ Associate Judge

APPENDIX

THIS APPLICATION INVOLVES THE FOLLOWING:

☐ discovery: comply with demand for documents

☐ discovery: production of additional documents

☐ other matters concerning document discovery

☐ extend oral discovery

☐ other matter concerning oral discovery

- ☐ amend pleadings
- ☐ add/change parties
- ☐ summary judgment
- ☐ summary trial
- ☐ service
- ☐ mediation
- ☐ adjournments
- ☐ proceedings at trial
- ☐ case plan orders: amend
- ☐ case plan orders: other
- ☐ experts
- ☒ none of the above

VANCOUVER
SEP 09 2024
REGISTRY

No. S-246230
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INTRACORP VANNESS LIMITED PARTNERSHIP

PLAINTIFF

AND:

THE OWNERS, STRATA PLAN LMS992, and CROWE MACKAY & COMPANY LTD., AS LIQUIDATOR OF THE OWNERS, STRATA PLAN LMS992

DEFENDANT

REQUISITION - SHORT NOTICE

Filed by: The Plaintiff, Intracorp Vanness Limited Partnership

Required: an order under Rule 8-5 (1) that the main application be brought on short notice.

This requisition is supported by the following:

1. Notice of Civil Claim dated September 9, 2024;
2. Notice of Application dated September 9, 2024;
3. Affidavit # 1 of Michelle Hsieh made September 9, 2024; and
4. Affidavit #1 of Evan Allegretto made September 8, 2024.

This is Exhibit " D " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026.

A Commissioner for taking Affidavits for British Columbia.

Date: September 9, 2024

Signature of Lawyer for Filing party
Rajit Mittal

THIS REQUISITION was prepared by **Rajit Mittal**, of the firm of Cassels Brock & Blackwell LLP, Lawyers, whose place of business and address for delivery is 2200 - 885 West Georgia Street, Vancouver BC V6E 3C8, Telephone: 604.691.6100.

ORDER BY ENDORSMENT (to be completed by judge, associate judge or registrar)

Date set for hearing of main application: September 9, 2024, at 2 p.m., without prejudice to the Respondents right to seek an adjournment.

Conditions for service:

Service by the applicant of the Notice of Application and applicant's affidavits with this order on the respondents before 12 p.m. on September 9, 2024, via email to counsel for the Respondents, Peter Roberts, K.C.

Service of the respondents' Application Response and affidavits on the applicant before 2 p.m. on September 9, 2024.

Other Conditions:

1. Response materials - 1:45 pm Sept 9/24.
2. Briefs to be filed - 1:45 pm Sept 9/24.
3.

Endorsed:

Judge/Associate Judge/Registrar

Date September 9, 2024

This is Exhibit " E " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026

A Commissioner for taking Affidavits for British Columbia.

VANCOUVER SEP 09 2024 REGISTRY

NO. S246230
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INTRACORP VANNESS LIMITED PARTNERSHIP

PLAINTIFF

AND

THE OWNERS, STRATA PLAN LMS992, and CROWE MACKAY & COMPANY LTD., AS LIQUIDATOR OF THE OWNERS, STRATA PLAN LMS992

DEFENDANTS

APPLICATION RESPONSE

Application Response of: Crowe MacKay & Company Ltd., as Liquidator of the Owners, Strata Plan LMS992 (the "**Application Respondent**")

THIS IS A RESPONSE TO the Notice of Application of the Plaintiff, Intracorp Vaness Limited Partnership

The Application Respondent estimates that the application will take 90 minutes.

Part 1: ORDERS CONSENTED TO

The Application Respondent consents to the granting of the orders set out in the following paragraphs of Part 1 of the Notice of Application on the following terms: NIL

Part 2: ORDERS OPPOSED

The Application Respondent opposes the granting of the orders set out in paragraphs 1(a), (b) and (c), 2 and 3 of Part 1 of the Notice of Application.

Part 3: ORDERS ON WHICH NO POSITION IS TAKEN

The Application Respondent takes no position on the granting of the orders set out in paragraphs NIL of Part 1 of the Notice of Application.

Part 4: FACTUAL BASIS

1. Unless otherwise defined herein, the Application Respondent shall adopt and use the defined terms set out in the Notice of Application filed September 9, 2024.

Part 5: LEGAL BASIS

2. The issues raised by the Plaintiff, Intracorp Vaness Limited Partnership ("**IVLP**"), are not new and IVLP's delay in bringing this application is, on its own, grounds to dismiss the application.

3. In making this effectively without notice application, IVLP has not made complete and candid disclosure to the court. In particular, IVLP has not put before the court any evidence relating to the prospect it may be required to pay a purchase price adjustment under Schedule G of the Agreement in the amount of approximately $3.5 million. Any damages claim ILVP may have would be an offset to the purchase price adjustment.

4. In any event, IVLP has not established on the evidence before the court that the condition of the Property, and in particular the Townhouses, is materially different or worse than it was on January 11, 2021 when the Agreement was signed.

5. The Liquidator has adduced evidence that, since its confirmation on October 19, 2022, the Liquidator has, on the advice of third party professionals, completed all the immediate and life-safety system repairs required in the Townhouses. The Property, including the Townhouses, are probably in better physical condition now than they were on January 11, 2021.

Part 6: MATERIAL TO BE RELIED ON

6. Affidavit #1 of A. Cheng, sworn September 9, 2024.

☒ The Application Respondent has filed in this proceeding a document that contains the Application Respondent's address for service.

Dated at the City of Vancouver, in the Province of British Columbia, this 9th day of September. 2024.

Lawson Lundell LLP
Solicitors for the Application Respondent,
Crow MacKay & Company Ltd. as
Liquidator of the Owners, Strata Plan
LM992

This Application Response is filed by Peter, J. Roberts K.C., of the law firm of Lawson Lundell LLP, whose place of business and address for delivery is 1600 – 925 West Georgia Street, Vancouver, British Columbia, V6C 3L2, e-mail address: proberts@lawsonlundell.com; telephone number: 604-685-3456.

SUPREME COURT
OF BRITISH COLUMBIA
VANCOUVER REGISTRY
SEP 09 2024
ENTERED

No. S-246230
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN

INTRACORP VANNESS LIMITED PARTNERSHIP

PLAINTIFF

AND

THE OWNERS, STRATA PLAN LMS992, and CROWE MACKAY & COMPANY LTD., AS LIQUIDATOR OF THE OWNERS, STRATA PLAN LMS992

DEFENDANTS

ORDER MADE AFTER APPLICATION

☒ BEFORE THE HONOURABLE JUSTICE KENT) 09/Sep/2024

ON THE APPLICATION of the Plaintiff, Intracorp Vanness Limited Partnership, coming on for hearing at the Vancouver Registry, 800 Smithe Street, Vancouver, British Columbia, on Monday, September 9, 2024, and upon hearing Rajit Mittal, counsel for the Plaintiff, and Peter J. Roberts K.C., counsel for the Defendants, The Owners Strata Plan LMS992 (the "**Strata Corporation**"), and Crowe MacKay & Company Ltd., as liquidator of the Strata Corporation (the "**Liquidator**"), and upon reading the materials filed herein;

THIS COURT ORDERS that:

1. The Liquidator retain in trust at Lawson Lundell LLP the sum of at least $525,000 from the special levy funds of the Strata Corporation until:

   (a) Agreement between parties in writing; or

   (b) Further order of this court.

This is Exhibit " F " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026.

A Commissioner for taking Affidavits for British Columbia.

2. Anyone affected by this order may apply to the court at any time to vary or discharge it on giving no less than five (5) business days' notice to the Plaintiff's solicitor of their intention to do so, but the order will remain in force until further order of this court even if such an application is pending.

3. The issue of costs of this application be adjourned.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT:

Lawyer for the Plaintiff,
Intracorp Vanness Limited Partnership
Rajit Mittal

Lawyer for the Defendants,
The Owners, Strata Plan PMS992, and Crowe Mackay & Company Ltd., as Liquidator of The Owners, Strata Plan LMS992
Peter J. Roberts, K.C.

By the Court.

Date: September 9, 2024

Registrar

Kent. J.

CHECKED

This is Exhibit " G " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026.

A Commissioner for taking Affidavits for British Columbia.

Vancouver
01-Nov-24
REGISTRY

NO. S246230
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INTRACORP VANNESS LIMITED PARTNERSHIP

PLAINTIFF

AND

THE OWNERS, STRATA PLAN LMS992, and CROWE MACKAY & COMPANY LTD., AS LIQUIDATOR OF THE OWNERS, STRATA PLAN LMS992

DEFENDANTS

RESPONSE TO CIVIL CLAIM

Filed by: Crowe MacKay & Company Ltd., as Liquidator of The Owners, Strata Plan LMS992 (the "**Liquidator**")

Part 1: RESPONSE TO NOTICE OF CIVIL CLAIM FACTS

Division 1 – Defendant's Response to Facts

1. The facts alleged in paragraphs 1, 2, 3, 7, 10 to 17, and 20 to 23 of Part 1 of the Notice of Civil Claim are admitted.

2. The facts alleged in paragraphs 4, 5, 6, 9, and 24 to 29 of Part 1 of the Notice of Civil Claim are denied.

3. The facts alleged in paragraphs 8, 18, 19 of Part 1 of the Notice of Civil Claim are outside the knowledge of the Defendant.

Division 2 – Defendant's Version of Facts

4. Unless otherwise expressly admitted herein, the Liquidator denies any and all liability to the Plaintiff and puts the Plaintiff to the strict proof of its claims.

5. Pursuant to a court order made on October 4, 2024 authorizing the Liquidator to defend this action on behalf of itself and The Owners, Strata Plan LMS-992 (the "**Joyce Place Strata**") and its members, this Response to Civil Claim is filed on behalf of both of the Defendants.

6. At all material times, Intracorp Acquisition Co. Ltd. and the Plaintiff, Intracorp Vanness Limited Partnership were related entities and shall be referred to collectively as "**Intracorp**".

7. The Joyce Place Strata was a strata corporation for a strata development referred to as "Joyce Place" which was located at 3380 Vanness Avenue, Vancouver, BC ("**Joyce Place**"). Joyce Place was a mixed-used strata development and is comprised of 52 apartment-style units, eight townhouses (the "**Townhouses**"), and three non-residential units.

8. Joyce Place was constructed in or around 1993. By around the late 2010s, the Joyce Place buildings were suffering from numerous deficiencies including, among other things, water ingress and structural issues in relation to the Townhouses.

9. On October 7 and November 19, 2017, the City of Vancouver (the "**City**") issued unsafe orders to the Joyce Place Strata (the "**City Orders**") requiring an application for a building permit and to correct the unsafe condition of the Townhouses.

10. In late 2020, the City commenced a prosecution of the Joyce Place Strata regarding the City Orders (the "**City Prosecution**"). On December 11, 2020, the Joyce Place Strata plead guilty to a single count of failing to comply with the City Orders and was ordered to apply for a building permit and undertake repairs.

11. At various dates prior to January 2021, the Joyce Place Strata obtained various reports relating to the condition of the buildings, including:

(a) a Building Envelope Condition Assessment prepared by MGH Consulting Inc. dated January 3, 2017 (the "**MGH Report**");

(b) a projected cost to repair report prepared by Axiom Builders dated January 24, 2020 (the "**Axiom Report**");

(c) a Structural Opinion Review prepared by Apex Building Science Inc. dated April 2019 (the "**Apex Report**"); and

(d) a Targeted Structural Assessment prepared by RDH Building Sciences Inc. dated June 25, 2020 (the "**RDH Report**").

12. By agreement dated January 11, 2021, Intracorp Acquisition Co. Ltd. and the Joyce Place Strata entered into a conditional Purchase and Sale Agreement (the "**PSA**") for the sale to Intracorp of the Joyce Place Strata lands and buildings (the "**Property**"). The terms of the PSA included:

13. The terms of the PSA included that:

(a) The purchase price would be $41,400,000 (the "**Purchase Price**") (s. 1(e));

(a) The Joyce Place Strata, within five days of the PSA, would "deliver or cause to be delivered to [Intracorp] true copies of all studies, tests, audits, surveys, investigations, reports (including depreciation reports and environmental, structural and mechanical reports), plans and service or maintenance records prepared or obtained since February 25, 2014" (the "**Condition Reports**") (s.5(a));

(b) The Joyce Place Strata would permit Intracorp to enter onto the Property to carry out inspections, tests, studies, surveys, and investigations of the property (s. 5(d));

(c) Time would be of the essence (s. 24);

(d) a purchaser's conditions under the PSA requiring:

> "the Purchaser being satisfied, in its sole and unfettered discretion, with the results of whatever searches, reviews and investigations the

> Purchaser, in its sole discretion, deems advisable with respect to the Property including, without limitation, the feasibility of the Purchaser purchasing and financing the purchase of the Property, state of title to the Property, the zoning for the Property, physical and engineering inspections of the Property, compliance with all applicable laws and regulations, any agreements with third parties affecting the Property or any improvements thereon, environmental audits, soil tests, any permitted encumbrances, all of the due diligence materials, the potential feasibility of successfully redeveloping and financing the redevelopment of the Property in a manner desired by the Purchaser, the potential assembly of neighbouring properties and any other matters of interest to the Purchaser with respect to the Property (the "**Purchaser's First Condition**");

(e) The Joyce Place Strata warrants and represents to Intracorp that, to the best of the Defendant's knowledge, there is no claim, litigation, or proceeding, pending or threatened, by or before any court, government agency, commission, department, board, officer, or other authority having jurisdiction that pertains in any manner to the Property or the right of Intracorp to own the Property or to receive benefits therefrom (schedule C, s. 1(e)); and

(f) The Joyce Place Strata would cause the Property "to be kept, repaired, and maintained to substantially the same condition and state of repair" as of the date of the PSA (January 11, 2021) so that on the Completion Date, Intracorp would acquire the Property in substantially the same condition and state of repair as that date, "subject to reasonable wear and tear" (schedule C, s. 2(a)).

14. In entering the PSA, and at all material times, Intracorp represented to the Defendants that it intended to purchase and redevelop Joyce Place, *i.e.*, tear down the buildings on the Property and construct a new development. It was mutually understood as between the parties that, given the impending demolishment of the Joyce Place buildings, and in particular the Townhouses, neither Intracorp nor the Defendants would be undertaking any major renovations or improvements beyond those necessary to address any life-safety issues.

15. The Joyce Place Strata delivered the Condition Reports, including the MGH Report, the Axiom Report, the Apex Report, the RDH Report, to Intracorp in compliance with the PSA.

16. As part of its due diligence under the PSA, Intracorp both inspected the Joyce Place Strata and reviewed all the minutes of annual and special general meetings of the Joyce Place Strata. As a result, Intracorp was at all material times aware of the condition of the Townhouses, the issuance of the City Orders, the fact of the City Prosecution and the subsequent "Court Orders" (as defined in the Notice of Civil Claim).

17. On February 18, 2021, Intracorp waived the Purchaser's First Condition under the PSA.

18. On July 7, 2021, the Joyce Place Strata held a special general meeting of its members (the "**Wind-up SGM**") for the purpose of considering resolutions to:

(a) to wind-up the Joyce Place Strata and appoint Crowe MacKay & Company Ltd. as its liquidator pursuant to section 277 of the *Strata Property Act*, S.B.C., 1998, c. 43 (the "**SPA**"); and

(b) approve the PSA pursuant to section 282 of the SPA

(the "**SGM Resolutions**").

19. The SGM Resolutions were passed at the Wind-up SGM.

20. By Notice of Assignment dated August 25, 2021, the PSA was assigned by Intracorp Acquisition Co. Ltd. to the Plaintiff, Intracorp Vanness Limited Partnership as purchaser.

21. On September 2, 2021, the Joyce Place Strata commenced a petition (Vancouver Reg. No. S217956) (the "**Wind-up Petition**") pursuant to Part 16, Division 2 of the SPA.

22. On April 7, 2022, Intracorp filed a Response to Petition in the Wind-up Petition consenting to court approval of the PSA and the mechanics of the sale of the Joyce Place Strata to Intracorp under the PSA.

23. On October 19, 2022, in the Wind-up Petition the court confirmed the voluntary wind-up of the Joyce Place Strata, confirmed the appointment of the Liquidator, Crowe MacKay & Company Ltd., as the liquidator of the Joyce Place Strata and approved the PSA.

24. Pursuant to section 279 of the SPA, the Liquidator's appointment took effect on October 22, 2022.

25. Following its appointment, the Liquidator, on behalf of the Joyce Place Strata, engaged professionals and undertook improvements to address structural and life-safety issues in relation to the Townhouses. The work authorized by the Liquidator included, among other things, assessment of life-safety concerns, structural repairs, repairs of existing shoring, a hazmat inspection, installation of plywood sheathing, and the repair of roof membranes.

26. By agreement between the parties and exercise of extension rights by Intracorp, the completion of the PSA and the transfer of the Property to Intracorp occurred on September 9, 2024 (the "**Completion Date**").

27. On the Completion Date, the Liquidator, on behalf of the Joyce Place Strata, delivered the Property to Intracorp in accordance with the PSA.

28. In response to the whole of the Notice of Civil Claim, the Liquidator denies that the Defendants breached the PSA, as alleged or at all. At all material times, the Defendants acted in good faith and in accordance with its contractual obligations under the PSA.

29. In specific response to paragraphs 4 and 24(a) of Part 1 of the Notice of Civil Claim, the Liquidator denies that the Property's fire alarm system was not in working order on the Completion Date. The Property's fire alarm system was fully operational on the Completion Date.

30. On the Completion Date, the Property was delivered to Intracorp in "substantially the same condition and state of repair" as it was on January 11, 2021, the date of the PSA. As a result of the work and repairs authorized and undertaken by the Joyce Place Strata, and then the Liquidator following its appointment, the condition and state of repair of the Property met, if not exceeded, the standard required by the PSA.

31. In specific responses to paragraphs 26 and 27 of Part 1 of the Notice of Civil Claim, the existence of investigations and orders by the City, including the City Orders and the City Prosecution, were facts known to Intracorp prior to the date of the PSA and at all other material times, and the Liquidator denies any breach of s. 1(e) of Schedule C of the PSA.

32. As set out above, the Joyce Place Strata, and the Liquidator following its appointment, maintained and repaired the Property both in accordance with its obligations under the PSA and in response to investigations and orders by the City.

33. By the Order of Judge P. Stark of the Provincial Court of British Columbia made March 9, 2023 (the "**Stark Order**"), the Liquidator was granted an extension to September 30, 2024 to "submit a complete application for any required permits to repair the failed structural framing at the north elevation of the premises, or have the premises at the Property demolished, or dispose of the land and building at the Property". The premises described in the Stark Order are the Townhouses.

34. As of the Completion Date, the Liquidator has fully complied with the Stark Order by disposing of the Property by way of the PSA. In any event, Intracorp faces no jeopardy as a result of the City Prosecution or any of the Court Orders (as defined in the Notice of Civil Claim).

35. Further, and in specific response to paragraph 29 of Part 1 of the Notice of Civil Claim, the Liquidator denies that Intracorp has suffered, or will continue to suffer, any loss and damage, and puts Intracorp to the strict proof thereof.

Division 3 – Additional Facts

36. The existence of the COVID-19 pandemic and the nature of governmental response to it were widely and publicly known prior to January 2021.

37. The PSA contained a mechanism for calculating an adjustment to the Purchase Price (the "**PPA**") to be payable by Intracorp to the Joyce Place Strata. In entering the PSA, the parties agreed that a PPA would be determined and calculated as follows:

(a) Six strata developments in Vancouver (Regent Court, Nexus, Wall Central Park, Skyway Tower, Centro, and Circa) would be "**Comparable Developments**" for the purposes of calculating the PPA (with the individual strata lots therein being "**Comparable Strata Lots**") (schedule G, ss. 3(c), (d)).

(b) The aggregate assessed value of all of the Comparable Strata Lots as set out in BC Assessment's 2021 property assessment notices would be the "**Reference Date Aggregate Value**" (schedule G, s. 3(f));

(c) The aggregate assessed value of all of the Comparable Strata Lots as set out in BC Assessment's most recent property assessment notices issued prior to the Value Adjustment Date (*i.e.*, January 7, 2023) would be the "**Adjustment Date Aggregate Value**" (schedule G, s. 3(a));

(d) The percentage by which the Adjustment Date Aggregate Value exceeded the Reference Date Aggregative Value would be the "**Aggregate Value Increase**" (schedule G, s. 3(b));

(e) The "**Purchase Price Increase**" would be an amount equal to (A) the Purchase Price, multiplied by (B) the Aggregate Value Increase, multiplied by (C) sixty-five percent (65%) (schedule G, s. 3(3)); and

(f) If the Adjustment Date Aggregate Value was greater than the Reference Date Aggregate Value and the Aggregate Value Increase was greater than four percent (4%), then the Purchase Price would increase by the amount of the Purchase Price Increase.

38. The parties further agreed that any Comparable Developments that underwent a "**Comparable Development Change**" would not be used as a Comparable Development for the purpose of determining the PPA. A Comparable Development Change was defined to include the occurrence of any of the following (schedule G, s. 7):

(a) Any change or proposed change to the permitted use or redevelopment of any land within any Comparable Development (including, without limitation, any change or proposed change to the official community plan, zoning, or any other City bylaw which affects the redevelopment potential of such land);

…

(g) There is any other change, event, fact, or condition which causes the assessed value of Comparable Strata Lots with any Comparable Development to increase for reasons other than normal market conditions.

39. Since January 2021, no Comparable Development Change has occurred as that term is defined in the PPA.

40. On August 14, 2024, Intracorp, through its legal counsel, advised the Defendant of its position that there was no PPA payable to the Defendant under schedule G of the PSA as there were "no Comparable Developments for the purposes of calculating the Adjustment Date Aggregate Value", and cited the following as Comparative Development Changes:

(a) "[I]t is expected that the implementation of the Vancouver Plan [approved by City Council on July 22, 2022] will impact the nature and scale of permitted redevelopment in such areas, thereby affecting the redevelopment potential of the Comparable Developments";

(b) Changes to City's bylaws that "affect the costs of development which consequently affects the redevelopment potential for all of the Comparable Developments, and, accordingly, constitute Comparable Development Changes for all of the Comparable Developments"; and

(c) "The COVID-19 pandemic and the government's response to the pandemic is an event which caused the assessed value of the Comparable Strata Lots within any Comparable Development to increase for reasons other than normal market conditions";

(collectively, the "**Alleged Changes**").

41. The Alleged Changes are not Comparable Development Changes as contemplated by the PSA. In particular, at the time of the formation of the PSA, Intracorp knew or ought to have known that there was a reasonable prospect that the events constituting the Alleged Changes would occur, and the Alleged Changes fall within the scope of normal market conditions.

42. On the Completion Date, Intracorp paid the Purchase Price required by the PSA but, in breach of the PSA, refused to account for the PPA on the basis that, as a result of the Alleged Changes, there are no longer any Comparable Developments that can be used to calculate the PPA.

43. Intracorp's failure to account for and pay the PPA is a breach of the PSA. As a result of that breach, the Defendants have suffered loss and damage.

Part 2: RESPONSE TO RELIEF SOUGHT

44. The Defendant consents to the granting of the relief sought in paragraphs NIL of Part 2 of the Notice of Civil Claim.

45. The Defendant opposes the granting of the relief sought in paragraphs 30 (a) to (e) of Part 2 of the Notice of Civil Claim.

46. The Defendant takes no position on the granting of the relief sought in paragraphs NIL of Part 2 of the Notice of Civil Claim.

Part 3: LEGAL BASIS

47. The Defendant denies that it breached any term of the PSA, as alleged or at all. The Defendant has, at all material times, complied with the terms of the PSA.

48. Further, or in the alternative, if the Defendant breached any term of the PSA, which is not admitted and is expressly denied, the Defendant denies that Intracorp has suffered any loss, damage, or expense as a result, as alleged or at all, and puts Intracorp to the strict proof thereof.

49. Further, or in the alternative, if Intracorp suffered any loss, damage, or expense, which is not admitted and is expressly denied, Intracorp failed to mitigate any such loss, damage, or expense or such expense represents betterment and is not recoverable at law.

Defendant's address for service is c/o the law firm of Lawson Lundell LLP, whose place of business and address for service is 1600 – 925 West Georgia Street, Vancouver, British Columbia V6C 3L2 (Attention: Peter J. Roberts, K.C. / Sarah B. Hannigan).

Fax number address for service is: n/a

E-mail address for service is: proberts@lawsonlundell.com / shannigan@lawsonlundell.com

Dated at the City of Vancouver, in the Province of British Columbia, this 1st day of November, 2024.



Lawson Lundell LLP
Solicitors for the Defendant, Crowe MacKay & Company Ltd., as Liquidator of the Owners, Strata Plan LMS992

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

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

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

(a) prepare a list of documents in Form 22 that lists

(i) all documents that are or have been in the party's possession or control and that could, if available, be used by any party at trial to prove or disprove a material fact, and

(ii) all other documents to which the party intends to refer at trial, and

(b) serve the list on all parties of record.

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NO. S246230
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INTRACORP VANNESS LIMITED PARTNERSHIP

PLAINTIFF

AND

THE OWNERS, STRATA PLAN LMS992, and CROWE MACKAY & COMPANY LTD., AS LIQUIDATOR OF THE OWNERS, STRATA PLAN LMS992

DEFENDANTS

RESPONSE TO CIVIL CLAIM



Barristers & Solicitors
1600 Cathedral Place
925 West Georgia Street
Vancouver, British Columbia
V6C 3L2
Phone: (604) 685-3456
Attention: Peter J. Roberts, K.C. / Sarah B. Hannigan

PJR/acc2



This is Exhibit " H " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026.

A Commissioner for taking Affidavits for British Columbia.

NO. S246230
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INTRACORP VANNESS LIMITED PARTNERSHIP

PLAINTIFF

AND

THE OWNERS, STRATA PLAN LMS992, and CROWE MACKAY & COMPANY LTD., AS LIQUIDATOR OF THE OWNERS, STRATA PLAN LMS992

DEFENDANTS

AND:

INTRACORP VANNESS LIMITED PARTNERSHIP

DEFENDANT BY WAY OF COUNTERCLAIM

COUNTERCLAIM

Filed by: Crowe MacKay & Company Ltd., as Liquidator of The Owners, Strata Plan LMS992 (the "**Liquidator**")

TO: Intracorp Vanness Limited Partnership ("**Intracorp**")

This action has been brought by the Plaintiff against the Defendants for the relief set out in the Notice of Civil Claim filed in this action.

TAKE NOTICE that the Defendant claims against you for the relief set out in Part 2 below.

IF YOU INTEND TO RESPOND to the claim made against you in this Counterclaim, or if you have a set-off or counterclaim that you wish to have taken into account at trial, YOU MUST FILE a Response to Counterclaim in Form 4 in the above-named registry of this court within the time for Response to Counterclaim described below and SERVE a copy of the filed Response to Counterclaim on the address for service of the Defendant bringing this Counterclaim.

YOU OR YOUR LAWYER may file the Response to Counterclaim.

JUDGMENT MAY BE PRONOUNCED AGAINST YOU IF YOU FAIL to file the Response to Counterclaim within the time for Response to Counterclaim described below.

Time for Response to Counterclaim

A Response to Counterclaim must be filed and served on the Defendant bringing this Counterclaim,

(a) if you were served with the Counterclaim anywhere in Canada, within 21 days after that service,

(b) if you were served with the Counterclaim anywhere in the United States of America, within 35 days after that service,

(c) if you were served with the Counterclaim anywhere else, within 49 days after that service, or

(d) if the time for Response to Counterclaim has been set by order of the court, within that time.

CLAIM OF THE DEFENDANT BRINGING THE COUNTERCLAIM

Part 1: STATEMENT OF FACTS

1. Unless otherwise defined herein, the Liquidator adopts and shall use the defined terms set out in the Response to Civil Claim of the Liquidator.

2. The Liquidator repeats and relies on the allegations of fact set out in Part 1 of the Response to Civil Claim.

3. As a result of the breach of the PSA by Intracorp, the Liquidator and the Joyce Place Strata have suffered loss and expense.

Part 2: RELIEF SOUGHT

4. An order that Intracorp account for and pay to the Liquidator the PPA.

5. Damages for breach of the PSA.

6. Interest pursuant to the *Court Order Interest Act*.

7. Costs.

Part 3: LEGAL BASIS

8. Intracorp, by its refusal to account for and pay to the Liquidator the PPA in accordance with the PSA, has breached the PSA.

9. Intracorp is indebted under the PSA to pay to the Liquidator and the Joyce Place Strata the amount of the PPA.

10. As a result of Intracorp's breach of the PSA, the Liquidator and the Joyce Place Strata have suffered and continue to suffer damage, loss and expense.

11. Intracorp is liable to the Liquidator and the Joyce Place Strata for damages for breach of the PSA, in addition to the amount owing for the PPA under the PSA.

Address for service of the Defendant bringing this Counterclaim is c/o the law firm of Lawson Lundell LLP, whose place of business and address for service is 1600 – 925 West Georgia Street, Vancouver, British Columbia V6C 3L2 (Attention: Peter J. Roberts, K.C. / Sarah B. Hannigan).

Fax number address for service is: (604) 669-1620.

E-mail address for service is: proberts@lawsonlundell.com / shannigan@lawsonlundell.com

The address of the Registry is: 800 Smithe Street, Vancouver,
British Columbia V6Z 2E1

Dated at the City of Vancouver, in the Province of British Columbia, this 1st day of November, 2024.



Lawson Lundell LLP
Solicitors for the Defendant, Crowe MacKay & Company Ltd., as Liquidator of the Owners, Strata Plan LMS992

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

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

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

(a) prepare a list of documents in Form 22 that lists

(i) all documents that are or have been in the party's possession or control and that could, if available, be used by any party at trial to prove or disprove a material fact, and

(ii) all other documents to which the party intends to refer at trial, and

(b) serve the list on all parties of record.

This is Exhibit " I " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026.

A Commissioner for taking Affidavits for British Columbia.

VANCOUVER MAR 11 2025 REGISTRY

NO. S246230
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INTRACORP VANNESS LIMITED PARTNERSHIP

PLAINTIFF

AND

THE OWNERS, STRATA PLAN LMS992, and CROWE MACKAY & COMPANY LTD., AS LIQUIDATOR OF THE OWNERS, STRATA PLAN LMS992

DEFENDANTS

AND:

INTRACORP VANNESS LIMITED PARTNERSHIP

DEFENDANT BY WAY OF COUNTERCLAIM

NOTICE OF APPLICATION

Name of Applicant: Crowe MacKay & Company Ltd. as Liquidator of the Owners, Strata Plan LMS992

To: The Plaintiff, Intracorp Vanness Limited Partnership

TAKE NOTICE that an application will be made by the Applicant to the presiding judge at the Courthouse at 800 Smithe Street, in the City of Vancouver, in the Province of British Columbia on Thursday, the 24th day of April, 2025 at 9:45 am for the orders set out in Part 1 below.

The Applicant estimates that the application will take two (2) hours.

☐ This matter is within the jurisdiction of an Associate Judge.

☒ This matter is not within the jurisdiction of an Associate Judge.

Part 1: ORDERS SOUGHT

1. Pursuant to Rule 9-6, or in the alternative Rule 9-7, an order that the plaintiff's claim be dismissed and the defendants be awarded costs.

2. Such further and other relief as this Honourable Court may deem just.

Part 2: FACTUAL BASIS

A. Overview

3. This summary trial application arises out of a dispute following the completion of the sale to the Plaintiff, Intracorp Vanness Limited Partnership as purchaser, ("**Intracorp**"),[1] of a strata complex of The Owners, Strata Plan LMS992 (the "**Joyce Place Strata**").

4. The Joyce Place Strata was a strata development referred to as "Joyce Place" ("**Joyce Place**"), located at 3380 Vanness Avenue, Vancouver, BC. Joyce Place was a mixed-use strata comprised of 52 apartment-style units (strata lots 12 to 63), eight townhouses (strata lots 1 to 8) (the "**Townhouses**"), and three commercial units (strata lots 9 to 11).

5. Joyce Place was constructed in or around 1993. By the late 2010s, the Joyce Place buildings were suffering from numerous deficiencies including, among other things, water ingress and structural issues in the Townhouses.

6. By agreement dated January 11, 2021, Intracorp Acquisition Co Ltd. and the Joyce Place Strata entered into a conditional Purchase and Sale Agreement (the "**PSA**") for the sale to Intracorp of the Joyce Place Strata lands and buildings (the "**Joyce Place Property**").

7. On July 7, 2021, the Joyce Place Strata members resolved at a special general meeting (the "**SGM**") to wind-up the strata and appoint Crowe MacKay &

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[1] By Notice of Assignment dated August 25, 2021, Intracorp Acquisition Co Ltd. assigned the PSA to the Plaintiff, Intracorp Vanness Limited Partnership, as purchaser. For the purposes of this application, they will be collectively referred to as "Intracorp".

Company Ltd. as the liquidator (the "**Liquidator**") pursuant to Part 16, Division 2 of the *Strata Property Act*, S.B.C. 1998 c. 43 (the "***SPA***"). At the SGM, the Joyce Place Strata members also approved the PSA.

Cheng #1, Ex. D (paras. 24 to 27).

8. As mandated by the SPA, the Joyce Place Strata commenced a petition (the "**Strata Wind-Up**") seeking confirmation of the wind-up resolution and the appointment of the Liquidator. The Strata Wind-Up was contested and heard by Justice Marzari. Intracorp was a party to the Strata Wind-Up.

9. By order granted October 19, 2022, Justice Marzari confirmed the wind-up of the Joyce Place Strata, approved the appointment of the Liquidator and approved the PSA. In the course of the Reasons for Judgment, Justice Marzari made repeated reference to:

(a) The need for "comprehensive repairs" and the "serious and immediate issues regarding the unsafe condition of the Townhouses" at Joyce Place; and

(b) The issuance by the City of two "Unsafe Order" requiring "shoring for the Townhouses".

The Owners, Strata Plan LMS 992 (Re), 2022 BCSC 1829, paras. 4, 18, 19, 26-28, 32, 35, 36, 40, 44, 48, and 127-129,

10. On September 9, 2024 (the "**Closing Date**"), the PSA completed and the Joyce Place Property was transferred by the Liquidator to Intracorp.

Affidavit #1 of T. Takagaki ("**Takagaki #1**"), para. 4.

11. On the Closing Date, Intracorp also filed a claim against the Liquidator and the Joyce Place Strata alleging that they had breached the PSA by failing to:

(a) keep the fire alarm system at Joyce Place in working order;

(b) keep the Townhouses in the same condition as they had been on January 11, 2021; and

(c) comply with provincial court orders made in relation to Joyce Place.

12. The Liquidator applies to dismiss Intracorp's claims that the PSA was breached. Various professional inspection reports confirm that, on the Closing Date, the Joyce Pace fire alarm system was fully operational and the Townhouses were in substantially the same condition as they had been on January 11, 2021. Further, the transfer of the Joyce Place Property to Intracorp effectively ended the bylaw prosecution brought against the Joyce Place Strata by the City of Vancouver (the "**City**").

13. Because Intracorp's allegations are discrete factual issues, this matter is well-suited for summary disposition. The issues of fact are not complex, there are no credibility issues, and there is no meaningful dispute on the law.

14. A summary resolution will save the parties and the former owners significant time and expense associated with a full trial.

C. The Purchase and Sale Agreement and Strata Wind-up

15. In 2017, the Joyce Place Strata engaged engineers to prepare a building envelope assessment report of Joyce Place. The engineer recommended significant repairs to Joyce Place at an estimated cost of $2.4 to 4.1 million.

Affidavit #1 of A. Cheng ("**Cheng #1**"), Ex. D

16. Rather than proceeding with the repairs, the Joyce Place Strata began exploring options to wind-up and sell the Joyce Place Property. This led to the PSA with Intracorp, the terms of which included:

(a) a purchase price of $41,400,000 (the "**Purchase Price**"), plus a purchase price adjustment yet to be calculated (and which is the subject of the counterclaim);

(b) the delivery to Intracorp of "true copies of all studies, tests, audits, surveys, investigations, reports (including depreciation reports and environmental, structural and mechanical reports), plans and service or maintenance records prepared or obtained since February 25, 2014";

(c) permitting Intracorp to enter the Joyce Place Property to carry out inspections, tests, studies, surveys, and investigations; and

(d) a condition for the benefit of Intracorp of:

> the Purchaser being satisfied, in its sole and unfettered discretion, with the results of whatever searches, reviews and investigations the Purchaser, in its sole discretion, deems advisable with respect to the Property including, without limitation, the feasibility of the Purchaser purchasing and financing the purchaser of the Property, state of title to the Property, the zoning for the property, physical and engineering inspections of the Property, compliance with all appliable laws and regulations, any agreements with third parties affecting the Property or any improvements thereon, environmental audits, soil tests, any permitted encumbrances, all of the due diligence materials, the potential feasibility of successfully redeveloping the Property in a manner desired by the Purchaser, the potential assembly of neighbouring properties and any other matters of interest to the Purchaser with respect to the Property
>
> (the "**Purchaser's Condition**").

17. In addition, the Strata Corporation covenanted that:

(a) to the best of its knowledge as of the Agreement Date, there is no claim, litigation or proceeding, pending or threatened, by or before any court, government agency, commission, department, board, officer or other authority having jurisdiction that pertains in any manner to the Property or the right of the purchaser to own the Property or to receive benefits therefrom (s.1(e) of Schedule C of the PSA); and

(b) it would keep, repair and maintain the Property in the same condition and state of repair as of the Agreement Date until the Completion Date, subject to reasonable wear and tear (s.2(a) of Schedule C of the PSA).

18. In entering the PSA, Intracorp represented to the Joyce Place Strata and the Liquidator that it intended to purchase the Joyce Place Property for the purpose of redevelopment.

Cheng #1, Ex. C (para. 36).

19. On February 18, 2021, Intracorp waived the Purchaser's Condition.

Cheng #1, Ex. D (para. 23).

D. Intracorp's Claim

20. On the Closing Date (September 9, 2024), Intracorp filed its Notice of Civil Claim alleging three discrete breaches of the PSA. Intracorp pleads that the Joyce Place Strata and the Liquidator breached the PSA by failing to:

(a) keep the fire alarm system in working order, to the point that the Property's annunciator panel is no longer working and/or no is no longer connected to local fire services, posing a health and safety risk for residents of the Tower, pursuant to s. 2(a) of Schedule C of the PSA;

Notice of Civil Claim, para. 24(a).

(b) maintain and repair the Townhouses, such that they have fallen into further disrepair and may pose health and safety risks to their Occupants.; and

Notice of Civil Claim, para. 24(b).

(c) comply with Provincial Court orders issued against the Joyce Place Strata in a prosecution for failing to abide by City of Vancouver orders.

Notice of Civil Claim, para. 24(b).

(the "**Alleged Breaches**").

21. On September 9, 2024, Intracorp brought a without notice application seeking an order that the "Liquidator retain in trust . . . the sum of at least $525,000 from the special levy funds of the [Joyce Place Strata] until: a) agreement between the parties in writing; or b) further order of the court." This application was brought because Intracorp expected "its losses to be at least $525,000" and it was fearful that the Liquidator would "distribute the sales proceeds . . . to the strata lot owners of the [Joyce Place Strata"). Justice Kent granted an order that the Liquidator hold in trust at least $525,000 of special levy funds held by the Liquidator.

22. The Liquidator filed a Response to Civil Claim and Counterclaim on November 1, 2024. The Counterclaim, which is not the subject of this application, seeks to enforce against Intracorp the obligation to the purchase price adjustment under the PSA. The Liquidator claims that Intracorp is required to pay a significant purchase price adjustment under the PSA. Intracorp denies any funds are owing under the purchase price adjustment.

E. The Fire Alarm System at Joyce Place

23. On the Closing Date, the Joyce Place fire alarm system was fully functional and operational and was connected to local fire dispatch services. As a result, the Liquidator, as vendor, was in compliance with s. 2(a) of Schedule C of the PSA.

24. On September 7, 2024 (the "**Inspection Date**"), the Liquidator arranged for Community Fire Prevention ("**CFD**") to perform maintenance and an inspection of the Joyce Place fire alarm and fire monitoring system. CFD is a professional fire alarm installation, maintenance, and inspection company.

Takagaki #1, paras. 4 – 5.

25. On the Inspection Date, CFD attended at Joyce Place and completed a fire alarm system inspection in accordance with Underwriter Laboratories of Canada ("**ULC**") inspection and testing guidelines.

Takagaki #1, para. 6

26. CFD concluded that the Joyce Place fire alarm system was fully operational and active pursuant to ULC requirements as of the Inspection Date, CFD issued a fire alarm test and inspection report to this effect dated September 7, 2024.

Takagaki #1, para. 6, Ex. A

27. On the Inspection Date, Safeco Systems Ltd. ("**Safeco**") also attended Joyce Place to upgrade and inspect the Joyce Place fire monitoring system pursuant to ULC requirements. Safeco is a fire monitoring company that had provided monitoring services at Joyce Place since 2018.

Affidavit #1 of R. Saucier ("**Saucier #1**"), paras. 2 – 5.

28. On the Inspection Date, Safeco installed and tested an upgraded fire monitoring system at Joyce Place. After completing testing, Safeco concluded that the Joyce Place fire monitoring system was fully operational and actively communicating with a fire dispatch operator pursuant to ULC alarm monitoring requirements as of the Inspection Date.

Saucier #1, paras. 6 – 8, 10.

29. On September 9, 2024, Safeco emailed the property manager of Joyce Place advising that the Joyce Place alarm monitoring system had been upgraded, and Joyce Place was being actively monitored for fire safety.

Saucier #1, paras. 11, Ex. A.

F. The Condition of Joyce Place on the Closing Date

30. By virtue of its involvement in the Strata Wind-Up, Intracorp was well aware of the poor condition of the Townhouses.

31. On the Closing Date, the Joyce Place Property, including the Townhomes, was transferred to Intracorp in materially the same condition and state of repair as it has been on January 11, 2021, the date the PSA was signed. As a result, the Liquidator, as vendor, was in compliance with s. 2(a) of Schedule C of the PSA.

32. Prior to January 11, 2021, the Joyce Place Strata had obtained various inspections and reports relating to the condition of the buildings at Joyce Place, including:

(a) a Building Envelope Condition Assessment prepared by MGH Consulting Inc., dated January 3, 2017;

(b) a report outlining the projected cost to repair, prepared by Axiom Builders, dated January 24, 2020;

(c) a Structural Opinion Review prepared by Apex Building Science Inc., dated April 2019; and

(d) a Targeted Structural Assessment prepared by RDH Building Science Inc ("**RDH**"), dated June 25, 2020;

(the "**Condition Reports**").

33. The Condition Reports reported, *inter alia*, that the structural framing of the buildings at Joyce Place had been compromised due to water ingress and major repairs were required to mitigate life-safety issued posed by the water damage. The Joyce Place Strata delivered the Condition Reports to Intracorp pursuant to the PSA, a fact confirmed by Intracorp's waiver of the Purchaser's Conditions.

34. Prior to waiving the Purchaser's Conditions, Intracorp inspected, or had the opportunity to inspect, the Joyce Place Property and was in possession of all relevant documents from the Joyce Place Strata, including the Condition Reports.

35. Intracorp acknowledged its satisfaction with the condition of Joyce Place by waiving the Purchaser's Condition on February 18, 2021.

Cheng #1, Ex. D.

36. The Liquidator, on behalf of the Strata Corporation, engaged professionals to perform remediation work on Joyce Place based on the Condition Reports and the recommendations therein. The remediation work arranged for by the Liquidator included:

(a) installing plywood sheathing in the Townhomes;

(b) repairing structural shoring;

(c) assessing structural framing; and

(d) conducting a hazardous material analysis.

Cheng #1, Ex. C, Ex. D.

37. In or about 2020, the Joyce Place Strata, and later the Liquidator, engaged RDH to provide enclosure and structural condition assessments of the Townhouses. Between June 2020 and December 2024, Paul Good, a senior project engineer employed by RDH, performed a number of inspections and structural assessments of the Townhouses.

Affidavit #1 of P. Good ("**Good #1**"), paras. 2, 4.

38. In the fall of 2024, the Liquidator engaged Mr. Good to conduct an inspection of the Townhouses and provide an opinion on whether the Townhomes were in materially the same condition and state of repair, subject to reasonable wear and tear, as they had been on January 11, 2021.

39. On January 17, 2025, Mr. Good issued an inspection report comparing his previous assessments of the Townhouses to his findings during his site visit on December 4, 2024 (the "**January Report**").

40. In the January Report, Mr. Good stated that:

> "... with the exception of the localized interior structural damage noted in 3376, and the apparent shrinkage of temporary wood shoring, we are of the opinion that the building has been kept, repaired, and maintained to substantially the same condition and state of repair as of March 16, 2021. Furthermore, the advanced extent of moisture related damage that was observed on March 16, 2021, suggest that significant water ingress through exterior walls and third floor decks had been occurring for dozens of months prior to March 16, 2021."

Good #1, para. 15, Ex. H.

41. Comparing his previous inspections of the Townhouses to his inspection and findings on December 4, 2024, Mr. Good concluded in the January Report that the Townhouses had been kept, repaired, and maintained in substantially the same condition and repair as they had been on March 16, 2021.

42. Mr. Good used March 16, 2021 inspection as the comparison date because his March 16, 2021 was the closest inspection in time to January 11, 2021. Mr. Good noted that the damage he saw on March 16, 2021 "had been occurring for dozens of months prior to March 16, 2021." Therefore, Mr. Good's observations on March 16, 2021 most accurately reflect the condition and state of repair of the Townhouses on January 11, 2021.

Good #1, para 16.

G. Provincial Court Orders

43. In 2019, the City issued two "Unsafe Orders" to the Joyce Place Strata concerning structural deficiencies in the Townhouses. The Joyce Place Strata did not complete the work required to remedy the unsafe orders. As a result, the City charged the Joyce Place Strata with a bylaw contravention in December 2020.

Cheng #1, Ex. C (paras. 9 to 11),
Ex. D (paras 35 to 39).

44. On December 1, 2020, the Provincial Court of British Columbia ordered the Joyce Place Strata to install shoring in the Townhomes at the direction of a professional engineer and obtain the required permits to correct the unsafe building conditions pursuant to the City's bylaws by January 31, 2021 (the "**Schwartz Order**").

45. The Joyce Place Strata installed the shoring between April 2021 and July 2021.

Cheng #1, Ex. D (para. 40),
Cheng #2, Ex. C, Ex. E.

46. By virtue of its involvement in the Strata Wind-Up, Intracorp was well aware that the Joyce Place Strata had not complied with the City's "Unsafe Orders" regarding the Townhouses.

47. In July 2021, the Joyce Place Strata was charged by the City with failing to comply with the Schwartz Order.

48. On March 9, 2023, the Joyce Place Strata pled guilty to failing to comply the Schwartz Order. The Provincial Court ordered that the Liquidator:

> ". . .must submit a complete application for any required permits to repair the failed structural framing at the north elevation of the [Joyce Place Property], or have the premises at the [Joyce Place Property demolished, or dispose of the land and building at the Property, on or before December 31, 2023."
>
> (the "**Jamieson Order**")

49. The deadline imposed by the Jamieson Order was extended to September 30, 2024 by order of Judge Stark dated November 30, 2024.

Cheng #2, Ex. D.

50. The Liquidator transferred Joyce Place to Intracorp on the Completion Date. In doing so, the Liquidator discharged the Jamieson Order, bringing the City prosecution to an end. As a result, the Liquidator, as vendor, is in compliance with s. 1(e) of Schedule C of the PSA.

Part 3: LEGAL BASIS

51. The Liquidator relies on Rules 9-6 and 9-7 of the *Supreme Court Civil Rules* and on the inherent jurisdiction of the Court.

A. The Issues Are Suitable for Summary Disposition

52. A claim may be dismissed under Rule 9-6 where the court is satisfied, on reviewing evidence that provides a complete answer to a plaintiff's case, that it is manifestly clear (or beyond doubt) that the plaintiff is bound to lose.

Sakwi Creek Hydro Limited Partnership v. Dickin, 2023 BCCA 188, para. 25.

53. Alternatively, Rule 9-7 provides that, on hearing a summary trial application, the court may consider and weigh conflicting evidence and grant judgment in favour of any party, either on an issue or generally, unless the court is unable to find the necessary facts or is of the view that it would be unjust to do so.

Cepuran v. Carlton, 2022 BCCA 76 at paras. 149 – 150.

54. In deciding whether a matter is suitable for summary trial, the court may consider a number of factors including the amount involved, the complexity of the matter, its urgency, any prejudice likely to arise from delay, proportionality, the course of proceedings, and whether the evidence is sufficient to decide the dispute.

Cepuran, supra.

55. Judgment may be granted on a summary trial application despite conflicting affidavits or conflicting evidence where the court is able to make the necessary findings of fact and it is not unjust to do so. The court must be satisfied that it can deliver a just and fair result by proceeding summarily.

Fillingham v Big White Ski Resort Limited, 2017 BCSC 1702, para. 31;
Jamieson v. Whistler Mountain Resort Limited Partnership,
2017 BCSC 1001, paras. 65, 68.

56. The Liquidator submits that this Court can and should determine this matter by way of summary judgment or summary trial. The Liquidator has adduced evidence sufficient to allow the Court to determine that, as of the Closing Date and pursuant to the PSA:

(a) the fire alarm system at the Property was in working order;

(b) Joyce Place was transferred to Intracorp in substantially the same condition and state of repair as of the Agreement Date; and

(c) there was no extant claim, litigation or proceeding relating to Joyce Place following the Closing Date.

57. These issues are factually simple, do not engage contested legal principles and can be decided summarily on the affidavit evidence before the Court.

58. The issues raised on this application are suitable for summary trial. If the Liquidator is successful, that will dispose of this matter before either party incurs further litigation costs.

59. A full trial to resolve this matter would result in unnecessary delay and costs to all parties. In particular, it prejudices the former owners of Joyce Place who have been denied their full share of the Purchase Price. The prejudice to the former owners is exacerbated by the fact that they are not parties to this action.

B. The Liquidator did not Breach the PSA

60. The Liquidator did not breach any term of the PSA as alleged by Intracorp. The Liquidator's compliance with the PSA is confirmed by the inspections of CFD and Safeco and by the January Report. Further, the City bylaw prosecutions of the Joyce Place Strata are at an end, do not encumber the Joyce Place Property and are not charges that Intracorp must now face.

61. In assessing whether an actionable breach of contract has occurred, the court will the consider the breach in light of the known purposes for which the contract was entered into by the party not at fault.

Baker v. Warshawski, 2010 ABQB 219, para. 73.

62. In any event, where a property is to be transferred in substantially the same condition as on an initial inspection date, there must be "a substantial change in the condition of the property" by the time the purchaser takes possession in order to amount to a breach of contract.

Chaston v. Este, 2014 BCSC 20, paras. 85 – 86;
Morrison v. Mar Lado Enterprises Inc., 2001 BCSC 1032, paras. 42 – 43.

63. At all material times, Intracorp represented to the Joyce Place Strata owners and the Liquidator that it intended to demolish the Joyce Place Strata and re-develop the Joyce Place Property.

Cheng #1, Ex. C (para. 36),
Ex. D (paras. 18, 26 to 29).

64. Lastly, where the condition of a property exists but was not detected by a purchaser at the time that property was inspected, it cannot be said that the property is substantially different when the purchaser ultimately took possession and found the issue they initially failed to detect.

Woods v. Lillies, 2017 BCPC 331, para. 59.

65. Intracorp, as entitled under the PSA, inspected or had the opportunity to inspect the Joyce Place Property and was given all relevant documents in the possession of the Joyce Place Strata, including the Condition Reports. By waiving the Purchaser's Condition, Intracorp acknowledged its satisfaction with, *inter alia,* its own investigations of the Joyce Place Property and its understanding of the Condition Reports as of February 18, 2021.

C. Conclusion

66. As outlined above, the Liquidator, as vendor, satisfied and discharged its obligations under the PSA by:

(a) keeping the Property's fire alarm system and fire monitoring system in working order as of the Closing Date;

(b) delivering the Joyce Place Property, including the Townhomes, to Intracorp in substantially the same condition and state of repair as they had been on January 11, 2021; and

(c) complying with and bring to an end the City prosecution of the Joyce Place Strata relating to the Townhouses.

67. If Intracorp failed to identify issues regarding the condition of the Joyce Place Property prior to the Closing Date, they cannot now claim that the Joyce Place Property is in substantially worse condition than it was when Intracorp signed the PSA or when it waived the Purchaser's Condition.

68. The Liquidator seek the dismissal of Intracorp's claims and costs.

Part 4: MATERIAL TO BE RELIED ON

69. Affidavit #1 of Ashley Cheng, made September 9, 2024.

70. Affidavit #2 of Ashley Cheng, made March 5, 2025.

71. Affidavit #1 of Paul Good, made February 5, 2025.

72. Affidavit #1 of Tetsu Takagaki, made February 18, 2025.

73. Affidavit #1 of Rene Saucier, made February 19, 2025.

74. Order of Justice Kent, granted September 9, 2024.

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

(a) file an Application Response in Form 33,

(b) file the original of every affidavit, and every other document, that

(i) you intend to refer to at the hearing of this application, and

(ii) has not already been filed in the proceeding, and

(c) serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:

(i) a copy of the filed Application Response;

(ii) a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on that person;

(iii) if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7(9).

Dated at the City of Vancouver, in the Province of British Columbia, this 11th day of March, 2025.

Lawson Lundell LLP
Solicitors for the Applicant, Crowe MacKay & Company Ltd. as Liquidator of the Owners, Strata Plan LMS992

This Notice of Application is filed by Peter J. Roberts, K.C., of the law firm of Lawson Lundell LLP, whose place of business and address for delivery is 1600 – 925 West Georgia Street, Vancouver, British Columbia, V6C 3L2, e-mail address: proberts@lawsonlundell.com; telephone number: 604-685-3456.

To be completed by the court only:

Order made

☐ in the terms requested in paragraphs _____ of Part 1 of this Notice of Application

☐ with the following variations and additional terms:

_____

_____

_____

_____

Date:

_____

Signature of ☐Judge ☐Associate Judge

APPENDIX

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

THIS APPLICATION INVOLVES THE FOLLOWING:

- ☐ discovery: comply with demand for documents
- ☐ discovery: production of additional documents
- ☐ other matters concerning document discovery
- ☐ extend oral discovery
- ☐ other matter concerning oral discovery
- ☐ amend pleadings
- ☐ add/change parties
- ☐ summary judgment
- ☒ summary trial
- ☐ service
- ☐ mediation
- ☐ adjournments
- ☐ proceedings at trial
- ☐ case plan orders: amend
- ☐ case plan orders: other
- ☐ experts
- ☐ none of the above

NO. S246230
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INTRACORP VANNESS LIMITED PARTNERSHIP

PLAINTIFF

AND:

THE OWNERS, STRATA PLAN LMS992 ET AL.

DEFENDANTS

NOTICE OF APPLICATION

LAWSON LUNDELL LLP

Barristers & Solicitors
1600 Cathedral Place
925 West Georgia Street
Vancouver, British Columbia
V6C 3L2
Phone: (604) 685-3456
Attention: Peter J. Roberts, K.C.

PJR/acc2

This is Exhibit " J " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026.

A Commissioner for taking Affidavits for British Columbia.

NO. S246230
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INTRACORP VANNESS LIMITED PARTNERSHIP

PLAINTIFF

AND

THE OWNERS, STRATA PLAN LMS992, and CROWE MACKAY & COMPANY LTD., AS LIQUIDATOR OF THE OWNERS, STRATA PLAN LMS992

DEFENDANTS

AND

INTRACORP VANNESS LIMITED PARTNERSHIP

DEFENDANT BY WAY OF COUNTERCLAIM

LIST OF DOCUMENTS

Prepared by: the Defendants, Crowe MacKay & Company Ltd., as Liquidator of the Owners, Strata Plan LMS992 (the "Listing Party")

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

Please see the attached Schedule "A".

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

NIL

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

NIL

Part 4: DOCUMENTS FOR WHICH PRIVILEGE FROM PRODUCTION IS CLAIMED

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

GROUNDS OF PRIVILEGE

Solicitor/Client Privilege

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

Litigation Privilege

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

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

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

Settlement Negotiation Privilege

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

Please see the attached Schedule "B".

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

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

1. Documents consisting of or recording confidential communications between the Listing Party and the Listing Party's legal advisors for the purpose of giving the Listing Party legal advice in the context of this action;

2. Documents coming into being, prepared or coming into the possession of the Listing Party or their legal advisors, for the dominant purpose of this litigation, including drafts or pleadings, proofs of evidence, cases for the opinion of counsel, opinions of counsel and instructions to counsel prepared and given in anticipation and during the progress of this action, letters and copies of letters passing between the Listing Party and the Listing Party's counsel and memoranda made by the Listing Party's solicitors and the Listing Party's agents and experts for the purpose of defending/prosecuting the action (and prosecuting the counterclaim herein); and

3. Documents consisting of or recording confidential communications between the Listing Party, their agents, or their legal advisors and the opposing party, its agent, or its advisors for the purpose of negotiating a settlement of an issue or issues between them.

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

Dated: April 17, 2025

Implied undertaking to the court

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



Lawson Lundell LLP
Solicitors for the Listing Party, Crowe MacKay & Company Ltd., as Liquidator of the Owners, Strata Plan LMS992

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

BEGBATES	BEGATTACH	DATE	TYPE	AUTHOR	RECIPIENT	TITLE	REDACTION REASON
LIQ000001-0001	LIQ000001-0001	01/03/2017	Assessment	MGH Consulting Inc.	The Owners, Strata Plan LMS992	Building Envelope Condition Assessment at Joyce Place	
LIQ000002-0001	LIQ000002-0001	10/31/2018	Report	MGH Consulting Inc.	The Owners, Strata Plan LMS992	Town Homes - Structural Shoring Assessment	
LIQ000003-0001	LIQ000003-0001	04/17/2019	Report	Apex Building Sciences Inc.	The Owners, Strata Plan LMS992	Structural Opinion Review - Joyce Place Townhomes	
LIQ000004-0001	LIQ000004-0001	09/23/2019	Report	City of Vancouver		CE - Inspection Report - Joyce Place	
LIQ000005-0001	LIQ000005-0001	01/24/2020	Report	Axiom Builders Inc.	The Owners, Strata Plan LMS992;Vanness Remediation	Schedule 5-A Order of Magnitude Report	
LIQ000006-0001	LIQ000006-0001	06/25/2020	Report	Paul Good [RDH Building Science Inc.]	Leo Chan [Dwell Property Management];The Owners, Strata Plan LMS992	Re Targeted Structural Assessment	
LIQ000007-0001	LIQ000007-0001	02/18/2021	Notice	Intracorp Acquisition Co. Ltd.	The Owners, Strata Plan LMS992	Notice of Waiver of Condition Precedent	
LIQ000008-0001	LIQ000008-0001	00/00/0000	Photos				
LIQ000009-0001	LIQ000009-0001	04/30/2021	Report	RDH Building Science	Leo Chan [Dwell Property Management];To the Owners of Joyce Place, Strata Plan LMS 992	Design Report - Final	
LIQ000010-0001	LIQ000010-0001	04/30/2021	Invoice	Steelhead Contracting Ltd.	Strata Plan LMS 992	#14866	
LIQ000011-0001	LIQ000011-0001	05/11/2021	Report	Daniel Song [RDH Building Science Inc]	Leo Chan [Dwell Property Management];The Owners, Strata Plan LMS992	Re Site Visit Report	
LIQ000012-0001	LIQ000012-0001	07/07/2021	Minutes			Minutes of Special General Meeting - Joyce Place	
LIQ000013-0001	LIQ000013-0001	02/24/2022	Minutes			Minutes of Annual General Meeting - Strata Plan LMS992 Strata Corporation - Joyce Place	
LIQ000014-0001	LIQ000014-0001	10/25/2022	msg	leo chan <leo.chan@dwellproperty.ca>	derek lai <derek.lai@crowemackay.ca>;hamilton, stephen <shamilton@hamiltonco.ca>	RE: Strata Windup Joyce Place - Strata Council Members & Insurance	
LIQ000015-0001	LIQ000014-0001	04/03/2020	msg	leo chan <leo.chan@dwellproperty.ca>		LMS992	
LIQ000016-0001	LIQ000014-0001	02/24/2022	Minutes			Minutes of Annual General Meeting - Strata Plan LMS992 Strata Corporation - Joyce Place	
LIQ000017-0001	LIQ000017-0001	10/31/2022	msg	leo chan <leo.chan@dwellproperty.ca>	derek lai <derek.lai@crowemackay.ca>;roz dickett <rdickett@capricmw.ca>;tetsu takagaki <tetsu.takagaki@crowemackay.ca>	RE: Joyce Place - Liquidator and introduction	
LIQ000018-0001	LIQ000017-0001	06/25/2020	Report	Paul Good [RDH Building Science Inc.]	Leo Chan [Dwell Property Management];The Owners, Strata Plan LMS992	Re Targeted Structural Assessment	
LIQ000019-0001	LIQ000017-0001	04/30/2021	Invoice	Steelhead Contracting Ltd.	Dwell Property Management;The Owners, Strata Plan LMS992	#14866	
LIQ000020-0001	LIQ000020-0001	11/17/2022	msg	paul good <pgood@rdh.com>	nelson allan <nelson.allan@crowemackay.ca>	2565.015 | Joyce Place | previous reports | project status - Nov 16, 2022	
LIQ000021-0001	LIQ000020-0001	06/14/2022	msg	paul good <pgood@rdh.com>	brian yan muk <b.yanmuk@gmail.com>	RE: LMS 992 - Joyce Place - Townhouse Shoring Inspection	
LIQ000022-0001	LIQ000020-0001	00/00/0000	Terms and Conditions	RDH Building Science		General Terms and Conditions	

LIQ000023-0001	LIQ000023-0001	11/25/2022	msg	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	derek lai <derek.lai@crowemackay.ca>;ed wilson (3148) - 17flr <ewilson@lawsonlundell.com>;peter roberts (3158) - 14flr <proberts@lawsonlundell.com>	RDH Design Report for rehabilitation of envelope - April 2021	
LIQ000024-0001	LIQ000023-0001	04/30/2021	Report	RDH Building Science	Strata Plan LMS 992	Design Report - Final	
LIQ000025-0001	LIQ000025-0001	12/02/2022	Report	Matthew Cheong [RDH Building Science Inc.]	Leo Chan [Dwell Property Management];The Owners, Strata Plan LMS992	Re Temporary Shoring Review	
LIQ000026-0001	LIQ000026-0001	12/02/2022	msg	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	derek lai <derek.lai@crowemackay.ca>	Temporary Shoring Review - November 25 2022	
LIQ000027-0001	LIQ000026-0001	12/02/2022	Letter	Matthew Cheong [RDH Building Science Inc.]	Leo Chan [Dwell Property Management];To the Owners of Joyce Place, Strata Plan LMS 992	Re: Temporary Shoring Review	
LIQ000028-0001	LIQ000028-0001	12/02/2022	msg	derek lai <derek.lai@crowemackay.ca>	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	RE: Temporary Shoring Review - November 25 2022	
LIQ000029-0001	LIQ000029-0001	12/07/2022	Letter	Derek Lai [Crowe MacKay & Company Ltd.]	To the Owners of Joyce Place, Strata Plan LMS 992	Re: Strata Windup - Strata Plan LMS 992 (Joyce Place) - Update from Liquidator	
LIQ000030-0001	LIQ000030-0001	12/12/2022	msg	brian yan muk <b.yanmuk@gmail.com>	derek lai <derek.lai@crowemackay.ca>	Re: Joyce Place Windup - Update to Strata Council re: Concerns, Insurance, Appeal & Sale	
LIQ000031-0001	LIQ000031-0001	12/12/2022	Quotation	Alliance EHS Consulting Inc.	RDH Building Science Inc.;The Owners, Strata Plan LMS992	Re: Fee Proposal - Hazardous Materials Assessment - Quote D1148	
LIQ000032-0001	LIQ000032-0001	12/14/2022	msg	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	leo chan <leo.chan@dwellproperty.ca>	RE: 2565.015 - Joyce Place Townhouses | Hazmat Proposal	
LIQ000033-0001	LIQ000032-0001	12/12/2022	Quotation	Alliance EHS Consulting Inc.	The Owners, Strata Plan LMS992	Re Free Proposal - Hazardous Materials Assessment - Quote D1148	
LIQ000034-0001	LIQ000034-0001	01/09/2023	msg	brian yan muk <b.yanmuk@gmail.com>	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	Re: Joyce Place - Tower Life-Safety Assessment	
LIQ000035-0001	LIQ000035-0001	01/09/2023	msg	derek lai <derek.lai@crowemackay.ca>	brian yan muk <b.yanmuk@gmail.com>	RE: Joyce Place - Tower Life-Safety Assessment	
LIQ000036-0001	LIQ000036-0001	02/16/2023	Notice	Dwell Property Management	To the Owners of Joyce Place, Strata Plan LMS 992	Notice of Annual General Meeting	
LIQ000037-0001	LIQ000037-0001	01/20/2023	Report	Alliance EHS Consulting Inc.	The Owners, Strata Plan LMS992	Pre-Renovation Hazardous Materials Survey	
LIQ000038-0001	LIQ000038-0001	01/21/2023	msg	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	derek lai <derek.lai@crowemackay.ca>;peter roberts (3158) - 14flr <proberts@lawsonlundell.com>	Fwd: 3362-3376 Vanness Street Hazardous Materials Assessment	
LIQ000039-0001	LIQ000038-0001	01/20/2023	Report	Alliance EHS Consulting Inc.	The Owners, Strata Plan LMS992	Pre-Renovation Hazardous Materials Survey	
LIQ000040-0001	LIQ000040-0001	01/24/2023	msg	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	derek lai <derek.lai@crowemackay.ca>;ed wilson (3148) - 17flr <ewilson@lawsonlundell.com>;peter roberts (3158) - 14flr <proberts@lawsonlundell.com>	Fwd: 2565.015 - Joyce Place - contractor's assistance requested	
LIQ000041-0001	LIQ000040-0001	12/02/2022	Report	RDH Building Science	The Owners, Strata Plan LMS992	Temporary Shoring Review	

LIQ000042-0001	LIQ000042-0001	01/26/2023	msg	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	derek lai <derek.lai@crowemackay.ca>;ed wilson (3148) - 17flr <ewilson@lawsonlundell.com>;peter roberts (3158) - 14flr <proberts@lawsonlundell.com>	FW: 2565.015 | Joyce Place 3362-3376 Vanness Street | Hazardous Materials Assessment	
LIQ000043-0001	LIQ000043-0001	01/31/2023	msg	derek lai <derek.lai@crowemackay.ca>	megan clarke <coppertopped@gmail.com>	RE: City of Burnaby Fire Department	
LIQ000044-0001	LIQ000044-0001	02/01/2023	msg	derek lai <derek.lai@crowemackay.ca>	megan clarke <coppertopped@gmail.com>	RE: City of Burnaby Fire Department	
LIQ000045-0001	LIQ000045-0001	02/01/2023	msg	megan clarke <coppertopped@gmail.com>	derek lai <derek.lai@crowemackay.ca>	Re: City of Burnaby Fire Department	
LIQ000046-0001	LIQ000046-0001	02/06/2023	Letter	Derek Lai [Crowe MacKay & Company Ltd.]	To the Owners of Joyce Place, Strata Plan LMS 992	Re Strata Windup - Strata Plan LMS 992 - Update from Liquidator	
LIQ000047-0001	LIQ000047-0001	02/16/2023	Minutes			Minutes of Annual General Meeting - Strata Plan LMS992 Strata Corporation - Joyce Place	
LIQ000048-0001	LIQ000048-0001	03/16/2023	msg	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	derek lai <derek.lai@crowemackay.ca>;peter roberts (3158) - 14flr <proberts@lawsonlundell.com>	RE: Joyce Place - Letter to Owners (Feb 6 203) to be uploaded on website	
LIQ000049-0001	LIQ000049-0001	05/15/2023	Letter	Derek Lai [Crowe MacKay & Company Ltd.]	To the Owners of Joyce Place, Strata Plan LMS 992	Re Strata Windup - Strata Plan LMS 992 - Update from Liquidator	
LIQ000050-0001	LIQ000050-0001	05/29/2023	Agreement	Derek Lai [Crowe MacKay & Company Ltd.]	To the Owners of Joyce Place, Strata Plan LMS 992	Re Strata Windup - Strata Plan LMS 992 - Update from Liquidator	
LIQ000051-0001	LIQ000051-0001	06/23/2023	msg	derek lai <derek.lai@crowemackay.ca>	brian yan muk <b.yanmuk@gmail.com>;<ferdz777@gmail.com>;<fionachan3380@gmail.com>;<herak21@hotmail.com>;<pearlkaocheung@icloud.com>;<seandimitrie@gmail.com>;<simondavison@gmail.com>	RE: Joyce Place Townhouse Review | LMS992 Complaints 投诉 from 3372	
LIQ000052-0001	LIQ000051-0001	06/23/2023	msg	derek lai <derek.lai@crowemackay.ca>	leo chan <leo.chan@dwellproperty.ca>;paul good <pgood@rdh.com>	RE: Joyce Place Townhouse Review | LMS992 Complaints 投诉 from 3372	
LIQ000053-0001	LIQ000053-0001	08/10/2023	msg	derek lai <derek.lai@crowemackay.ca>	brian yan muk <b.yanmuk@gmail.com>;<ferdz777@gmail.com>;<fionachan3380@gmail.com>;<herak21@hotmail.com>;<pearlkaocheung@icloud.com>;<seandimitrie@gmail.com>;<simondavison@gmail.com>	Strata Windup Joyce Place - Update to Owners and Townhouse Concerns	
LIQ000054-0001	LIQ000053-0001	08/08/2023	msg	paul good <pgood@rdh.com>	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	Joyce Place Townhouses - proposed next steps - Aug 8 2023	
LIQ000055-0001	LIQ000053-0001	08/10/2023	Letter	Derek Lai [Crowe MacKay & Company Ltd.]	To the Owners of Joyce Place, Strata Plan LMS 992	Re: Strata Windup - Strata Plan LMS 992 - Update from Liquidator	
LIQ000056-0001	LIQ000056-0001	09/07/2023	msg	derek lai <derek.lai@crowemackay.ca>	peter roberts (3158) - 14flr <proberts@lawsonlundell.com>	Joyce Place Windup - Use of Special Levy Funds	
LIQ000057-0001	LIQ000056-0001	08/25/2023	Letter	Derek Lai [Crowe MacKay & Company Ltd.]	To the Owners of Joyce Place, Strata Plan LMS 992	Re Strata Windup - Strata Plan LMS 992 - Update from Liquidator	

LIQ000058-0001	LIQ000058-0001	10/03/2023	msg	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	brian yan muk <b.yanmuk@gmail.com>;derek lai <derek.lai@crowemackay.ca>;ferdie aquino <ferdz777@gmail.com>;fiona chan <fionachan3380@gmail.com>;hera khangura <herak21@hotmail.com>;leo chan <leo.chan@dwellproperty.ca>;sean dimitrie <seandimitrie@gmail.com>;simon davison <simondavison@gmail.com>;<pearlkaocheung@icloud.com>	Joyce Place - RDH SVR Townhouses	
LIQ000059-0001	LIQ000058-0001	09/28/2024	Report	Daniel Song [RDH Building Science Inc]	Leo Chan [Dwell Property Management];The Owners, Strata Plan LMS992	Site Visit Report	
LIQ000060-0001	LIQ000060-0001	08/25/2023	Letter	Derek Lai [Crowe MacKay & Company Ltd.]	To the Owners of Joyce Place, Strata Plan LMS 992	Re: Strata Windup - Strata Plan LMS 992 - Update from Liquidator	
LIQ000061-0001	LIQ000061-0001	08/25/2023	Letter	Derek Lai [Crowe MacKay & Company Ltd.]	The Owners, Strata Plan LMS992	Re: Strata Windup - Strata Plan LMS 992 (Joyce Place) - Update from Liquidator	
LIQ000062-0001	LIQ000061-0001	10/11/2023	Agreement	Intracorp Vanness Limited Partnership	The Owners, Strata Plan LMS992	Amendment to Purchase and Sale Agreement	
LIQ000063-0001	LIQ000061-0001	10/27/2023	Letter w_Attachment	Buck, Hart [Colliers]	Derek Lai [Crowe MacKay & Company Ltd.]	Re Purchase Subject Removal Extension	
LIQ000064-0001	LIQ000061-0001	10/30/2023	Minutes			The Owners, Strata Plan LMS992 - Joyce Place - Information Meeting	
LIQ000065-0001	LIQ000065-0001	11/25/2023	msg	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	jillian epp (3602) - 14flr <jepp@lawsonlundell.com>	RE: Joyce Place - application in provincial court proceedings	
LIQ000066-0001	LIQ000065-0001	00/00/0000	Memo			Memo for Affidavit - TT draft v1	
LIQ000067-0001	LIQ000067-0001	02/06/2023	Notice	Dwell Property Management	To the Owners of Joyce Place, Strata Plan LMS 992	Notice of the Annual General Meeting	
LIQ000068-0001	LIQ000068-0001	11/09/2023	msg	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	<gurinder.mangat@vancouver.ca>;Shirley Yim	RE: LMS992 Nov 10th appointment	Litigation and Solicitor-Client
LIQ000069-0001	LIQ000068-0001	01/12/2024	msg	mangat, gurinder <gurinder.mangat@vancouver.ca>	leo chan <leo.chan@dwellproperty.ca>	Re: LMS992 site report	
LIQ000070-0001	LIQ000070-0001	08/15/2024	msg	derek lai <derek.lai@crowemackay.ca>	brian yan muk <b.yanmuk@gmail.com>	Re: Joyce Place - Fire Alarm Concerns	
LIQ000071-0001	LIQ000071-0001	08/16/2024	msg	leo chan <leo.chan@dwellproperty.ca>	lisa frey (3139) - 17flr <lfrey@lawsonlundell.com>	RE: Joyce Place - Pre-Closing Matters	
LIQ000072-0001	LIQ000071-0001	06/30/2024	Financial Document	Dwell Property Management		Balance Sheet - Joyce Place, Strata Plan LMS992	
LIQ000073-0001	LIQ000073-0001	08/20/2024	msg	derek lai <derek.lai@crowemackay.ca>	brian yan muk <b.yanmuk@gmail.com>	RE: ComFire - Vancouver Quote 20240814-00554 - 3380 Vanness Ave, Vancouver	
LIQ000074-0001	LIQ000074-0001	08/26/2024	msg	ed wilson (3148) - 17flr <ewilson@lawsonlundell.com>	nikka borja (3384) - 17flr <nborja@lawsonlundell.com>	Fwd: 7 business days notice for strata lot access request Strata LMS 992	
LIQ000075-0001	LIQ000075-0001	02/06/2024	Minutes			Minutes of Annual General Meeting - Strata Plan LMS992 Strata Corporation - Joyce Place	Relevance
LIQ000076-0001	LIQ000076-0001	09/04/2024	Email	Lisa Frey [Lawson Lundell]	Nikka Borja [Lawson Lundell]	FW: Joyce Place - Damages in Unit - 3374	

LIQ000077-0001	LIQ000077-0001	09/04/2024	msg	wilbert de asis <deasiswilbert@yahoo.ca>	nikka borja (3384) - 17flr <nborja@lawsonlundell.com>	Fw: Joyce place Lms 992 TH#3368	
LIQ000078-0001	LIQ000078-0001	09/04/2024	msg	lisa frey (3139) - 17flr <lfrey@lawsonlundell.com>	nikka borja (3384) - 17flr <nborja@lawsonlundell.com>	FW: Joyce Place - Damanges in Unit - 3374	
LIQ000079-0001	LIQ000079-0001	09/04/2024	msg	lisa frey (3139) - 17flr <lfrey@lawsonlundell.com>	hoa nguyen <lilyngth09@gmail.com>	RE: Joyce Place - Damanges in Unit - 3374	
LIQ000080-0001	LIQ000080-0001	09/04/2024	msg	derek lai <derek.lai@crowemackay.ca>	ben lin <blin@intracorphomes.com>	RE: Engineered structural plans of any remediation work completed on the TH unit	
LIQ000081-0001	LIQ000080-0001	12/02/0022	Report	Matthew Cheong [RDH Building Science Inc.]	Leo Chan [Dwell Property Management];The Owners, Strata Plan LMS992	Re Temporary Shoring Review	
LIQ000082-0001	LIQ000080-0001	05/11/2021	Report	Daniel Song [RDH Building Science Inc]	Leo Chan [Dwell Property Management];The Owners, Strata Plan LMS992	Re Site Visit Report	
LIQ000083-0001	LIQ000080-0001	07/14/2021	Report	Paul Good [RDH Building Science Inc.]	Leo Chan [Dwell Property Management];The Owners, Strata Plan LMS992	Re Final Site Visit Report	
LIQ000084-0001	LIQ000080-0001	03/01/2023	Quotation	Steelhead Contracting Ltd.	RDH Building Science Inc.	Quotation 12091	
LIQ000085-0001	LIQ000080-0001	05/26/2023	Report	Daniel Song [RDH Building Science Inc]	Leo Chan [Dwell Property Management];The Owners, Strata Plan LMS992	Re Review of the Third Floor Deck at Townhouses	
LIQ000086-0001	LIQ000080-0001	09/28/2023	Report	Daniel Song [RDH Building Science Inc]	Leo Chan [Dwell Property Management];The Owners, Strata Plan LMS992	Re: Site Visit Report	
LIQ000087-0001	LIQ000087-0001	09/05/2024	msg	derek lai <derek.lai@crowemackay.ca>	ed wilson (3148) - 17flr <ewilson@lawsonlundell.com>;lisa frey (3139) - 17flr <lfrey@lawsonlundell.com>;peter roberts (3158) - 14flr <proberts@lawsonlundell.com>	FW: Comfire update	
LIQ000088-0001	LIQ000088-0001	09/06/2024	msg	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	ed wilson (3148) - 17flr <ewilson@lawsonlundell.com>;lisa frey (3139) - 17flr <lfrey@lawsonlundell.com>;peter roberts (3158) - 14flr <proberts@lawsonlundell.com>	RE: Joyce Place - Fire Watch	
LIQ000089-0001	LIQ000089-0001	09/06/2024	msg	derek lai <derek.lai@crowemackay.ca>	ed wilson (3148) - 17flr <ewilson@lawsonlundell.com>;lisa frey (3139) - 17flr <lfrey@lawsonlundell.com>;peter roberts (3158) - 14flr <proberts@lawsonlundell.com>;tetsu takagaki <tetsu.takagaki@crowemackay.ca>	RE: Joyce Place - Fire Watch	
LIQ000090-0001	LIQ000090-0001	09/06/2024	msg	lisa frey (3139) - 17flr <lfrey@lawsonlundell.com>	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	RE: Joyce Place - Brief Update to Owners - Community Fire Inspection	
LIQ000091-0001	LIQ000091-0001	09/06/2024	msg	lisa frey (3139) - 17flr <lfrey@lawsonlundell.com>		Joyce Place - Brief Update to Owners - Community Fire Inspection	

LIQ000092-0001	LIQ000092-0001	09/07/2024	Report	Community Fire Prevention	LMS 992 – Joyce Place	Fire Alarm System Test and Inspection Report	
LIQ000093-0001	LIQ000093-0001	09/08/2024	msg	rashida merchant <rashida.merchant2341@gmail.com>	lisa frey (3139) - 17flr <lfrey@lawsonlundell.com>	Re: Joyce Place - Damages in unit	
LIQ000094-0001	LIQ000094-0001	09/09/2024	msg	derek lai <derek.lai@crowemackay.ca>	ben lin <blin@intracorphomes.com>;leo chan <leo.chan@dwellproperty.ca>;tetsu takagaki <tetsu.takagaki@crowemackay.ca>	RE: Engineered structural plans of any remediation work completed on the TH unit	
LIQ000095-0001	LIQ000094-0001	08/08/2023	Invoice	EPS Building Maintenance Inc.	Strata Corporation LMS992	#23197	
LIQ000096-0001	LIQ000094-0001	08/11/2023	Invoice	EPS Building Maintenance Inc.	Strata Corporation LMS992	#23200	
LIQ000097-0001	LIQ000094-0001	08/14/2023	Invoice	EPS Building Maintenance Inc.	Strata Corporation LMS992	#23203	
LIQ000098-0001	LIQ000094-0001	08/18/2023	Invoice	EPS Building Maintenance Inc.	Strata Corporation LMS992	#23213	
LIQ000099-0001	LIQ000094-0001	08/21/2023	Invoice	EPS Building Maintenance Inc.	Strata Corporation LMS992	#23215	
LIQ000100-0001	LIQ000094-0001	10/20/2023	Invoice	EPS Building Maintenance Inc.	Strata Corporation LMS992	#23261	
LIQ000101-0001	LIQ000101-0001	09/09/2024	msg	derek lai <derek.lai@crowemackay.ca>	ed wilson (3148) - 17flr <ewilson@lawsonlundell.com>;lisa frey (3139) - 17flr <lfrey@lawsonlundell.com>;peter roberts (3158) - 14flr <proberts@lawsonlundell.com>	Fwd: LMS 992 - Joyce Place - 3380 Vanness Ave.	
LIQ000102-0001	LIQ000101-0001	09/07/2024	Report	Community Fire Prevention	LMS 992 – Joyce Place	Fire Alarm System Test and Inspection Report	
LIQ000103-0001	LIQ000103-0001	09/09/2024	Email	nikka borja (3384) - 17flr <nborja@lawsonlundell.com>	raman jandu (3101) - 17flr <rjandu@lawsonlundell.com>	FW Joyce Place - Damages in Unit	
LIQ000104-0001	LIQ000104-0001	09/09/2024	msg	peter roberts (3158) - 14flr <proberts@lawsonlundell.com>	catherine l.h. lee' <clee@terralawcorp.ca>	RE: Fire Monitoring - Update	
LIQ000105-0001	LIQ000104-0001	09/07/2024	Report	Community Fire Prevention	LMS 992 – Joyce Place	Fire Alarm System Test and Inspection Report	
LIQ000106-0001	LIQ000106-0001	09/09/2024	msg	nikka borja (3384) - 17flr <nborja@lawsonlundell.com>	raman jandu (3101) - 17flr <rjandu@lawsonlundell.com>	FW: Joyce Place - Damages in unit	
LIQ000107-0001	LIQ000106-0001	00/00/0000	Photo				
LIQ000108-0001	LIQ000106-0001	00/00/0000	Photo				
LIQ000109-0001	LIQ000106-0001	00/00/0000	Photo				
LIQ000110-0001	LIQ000106-0001	00/00/0000	Photo				
LIQ000111-0001	LIQ000106-0001	00/00/0000	Photo				
LIQ000112-0001	LIQ000112-0001	09/09/2024	msg	leo chan <leo.chan@dwellproperty.ca>	derek lai <derek.lai@crowemackay.ca>;tetsu takagaki <tetsu.takagaki@crowemackay.ca>	FW: Joyce Place in Vancouver	
LIQ000113-0001	LIQ000112-0001	09/01/2024	Invoice	Safeco Systems Ltd.	Joyce Place [LMS 992]; Dwell Property Management	Safeco_Systems_Ltd._Invoice_Credit_9-9-2024_14527.pdf	
LIQ000114-0001	LIQ000112-0001	09/07/2024	Invoice	Safeco Systems Ltd.	Joyce Place [LMS 992]; Dwell Property Management	Safeco_Systems_Ltd._Invoice_Credit_9-9-2024_14548.pdf	
LIQ000115-0001	LIQ000115-0001	09/20/2024	msg	rashida merchant <rashida.merchant2341@gmail.com>	lisa frey (3139) - 17flr <lfrey@lawsonlundell.com>;nikka borja (3384) - 17flr <nborja@lawsonlundell.com>	Re: Joyce Place - Notice of Application	
LIQ000116-0001	LIQ000115-0001	05/26/2020	Notice	Joyce Place Strata Council	Strata Plan LMS 992	LMS 992 - General Updates May 2020	
LIQ000117-0001	LIQ000115-0001	07/02/2020	Letter	Brian Yan Muk [LMS 992 Strata]	The Owners, Strata Plan LMS992	Re Letter to Owners - Annual General Meeting 2019/2020	

LIQ000118-0001	LIQ000115-0001	07/06/2020	Letter w_Attachment	Robert LeBlanc [City of Vancouver]	Forning Chan;Kevin Chan;The Owners, Strata Plan LMS992	Re Court File No. 27501; R v Forning and Kevin Gan Chan / The Owners of Strata Plan LMS992	
LIQ000119-0001	LIQ000115-0001	07/11/2020	Minutes			Minutes of Special General Meeting - Strata Plan LMS 992 Strata Corporation - Joyce Place	
LIQ000120-0001	LIQ000115-0001	07/15/2020	Notice	Leo Chan [Dwell Property Management]	LMS 992 – Joyce Place	LMS992 Joyce Place 3380 Vanness Ave - Re Update on City's lawsuit	
LIQ000121-0001	LIQ000115-0001	11/17/2020	Notice	Joyce Place Strata Council	The Owners, Strata Plan LMS992	Notice of November 2020 Virtual Town Hall	
LIQ000122-0001	LIQ000115-0001	03/16/2021	Letter	Brian Yan Muk [LMS 992 Strata]	The Owners, Strata Plan LMS992	Re Letter to Owners - Annual General Meeting - Saturday April 17, 2021 at 12:00 pm	
LIQ000123-0001	LIQ000115-0001	04/17/2021	Minutes			Minutes of Annual General Meeting - Strata Plan LMS992 Strata Corporation - Joyce Place	
LIQ000124-0001	LIQ000115-0001	07/07/2021	Minutes			Minutes of Special General Meeting - Strata Plan LMS992 - Joyce Place	
LIQ000125-0001	LIQ000115-0001	08/11/2021	Notice	Dwell Property Management	The Owners, Strata Plan LMS992	Re LMS992 Owners' arrears and bylaw enforcement	
LIQ000126-0001	LIQ000115-0001	01/25/2022	Letter	Brian Yan Muk [LMS 992 Strata]	The Owners, Strata Plan LMS992	Re Letter to Owners - Annual General Meeting 2021/2022 - Thursday February 24, 2021 at 5:00 pm (Registration 4:30 pm) in the backyard of the tower building	
LIQ000127-0001	LIQ000115-0001	02/24/2022	Minutes			Minutes of Annual General Meeting - Strata Plan LMS992 Strata Corporation - Joyce Place	
LIQ000128-0001	LIQ000115-0001	11/25/2022	Notice	Leo Chan [Dwell Property Management]		Re: Strata Plan LMS992 Joyce Place Town house Shoring inspection	
LIQ000129-0001	LIQ000115-0001	12/07/2022	Letter	Derek Lai [Crowe MacKay & Company Ltd.]	To the Owners of Joyce Place, Strata Plan LMS 992	Re Strata Windup - Strata Plan LMS 992 - Update from Liquidator	
LIQ000130-0001	LIQ000115-0001	12/22/2022	Letter	Derek Lai [Crowe MacKay & Company Ltd.]	To the Owners of Joyce Place, Strata Plan LMS 992	Re Strata Windup - Strata Plan LMS 992 - Update from Liquidator	
LIQ000131-0001	LIQ000115-0001	01/09/2023	Letter	Derek Lai [Crowe MacKay & Company Ltd.]	To the Owners of Joyce Place, Strata Plan LMS 992	Re Strata Windup - Strata Plan LMS 992 - Update from Liquidator	
LIQ000132-0001	LIQ000115-0001	02/06/2023	Letter	Derek Lai [Crowe MacKay & Company Ltd.]	To the Owners of Joyce Place, Strata Plan LMS 992	Re Strata Windup - Strata Plan LMS 992 - Update from Liquidator	
LIQ000133-0001	LIQ000115-0001	02/16/2023	Minutes			Minutes of Annual General Meeting - Strata Plan LMS992 Strata Corporation - Joyce Place	
LIQ000134-0001	LIQ000115-0001	02/16/2023	Notice	Dwell Property Management	To the Owners of Joyce Place, Strata Plan LMS 992	Notice of the Annual General Meeting	
LIQ000135-0001	LIQ000115-0001	03/15/2023	Letter	Derek Lai [Crowe MacKay & Company Ltd.]	To the Owners of Joyce Place, Strata Plan LMS 992	Re Strata Windup - Strata Plan LMS 992 - Update from Liquidator	
LIQ000136-0001	LIQ000115-0001	10/10/2023	Agreement	Derek Lai [Crowe MacKay & Company Ltd.]	To the Owners of Joyce Place, Strata Plan LMS 992	Re Strata Windup - Strata Plan LMS 992 - Update from Liquidator	
LIQ000137-0001	LIQ000115-0001	10/11/2023	Agreement	Intracorp Vanness Limited Partnership	The Owners, Strata Plan LMS992	Amendment to Purchase and Sale Agreement	
LIQ000138-0001	LIQ000115-0001	03/00/2023	Notice	Leo Chan [Dwell Property Management]	Owners of Apartment Units	Owners of Apartment Units (Access required for hazardous building materials inspections for selected units)	
LIQ000139-0001	LIQ000115-0001	11-Jul	Letter	Brian Yan Muk [LMS 992 Strata]	The Owners, Strata Plan LMS992	Strata Plan LMS 992	
LIQ000140-0001	LIQ000140-0001	10/17/2024	Letter	Lisa Frey [Lawson Lundell]	Patricia Williams-Gardner [Community Fire Prevention]	Re LMS 922 - Joyce Place c/o Dwell Property Management	
LIQ000141-0001	LIQ000141-0001	10/17/2024	msg	leo chan <leo.chan@dwellproperty.ca>	jillian sych (3327) - 17flr <jsych@lawsonlundell.com>	FW: Community Fire – Overdue Invoices for Account #270826	

LIQ000142-0001	LIQ000141-0001	09/11/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40434	
LIQ000143-0001	LIQ000141-0001	09/12/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40544	
LIQ000144-0001	LIQ000141-0001	09/12/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40542	
LIQ000145-0001	LIQ000141-0001	09/16/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40758	
LIQ000146-0001	LIQ000141-0001	09/18/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40954	
LIQ000147-0001	LIQ000147-0001	10/17/2024	msg	patricia williams-gardner <pwgardner@onyxfire.com>	leo chan <leo.chan@dwellproperty.ca>	FW: Community Fire – Overdue Invoices for Account #270826	Litigation
LIQ000148-0001	LIQ000147-0001	09/11/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40434	
LIQ000149-0001	LIQ000147-0001	09/12/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40544	
LIQ000150-0001	LIQ000147-0001	09/12/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40542	
LIQ000151-0001	LIQ000147-0001	09/16/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40758	
LIQ000152-0001	LIQ000147-0001	09/18/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40954	
LIQ000153-0001	LIQ000153-0001	10/31/2024 23:	msg	leo chan <leo.chan@dwellproperty.ca>	jillian sych (3327) - 17flr <jsych@lawsonlundell.com>	FW: Community Fire – Overdue Invoices for Account #270826	
LIQ000154-0001	LIQ000153-0001	09/11/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40434	
LIQ000155-0001	LIQ000153-0001	09/12/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40544	
LIQ000156-0001	LIQ000153-0001	09/12/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40542	
LIQ000157-0001	LIQ000153-0001	09/16/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40758	
LIQ000158-0001	LIQ000153-0001	09/18/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40954	
LIQ000159-0001	LIQ000159-0001	10/31/2024 23:	msg	jillian sych (3327) - 17flr <jsych@lawsonlundell.com>	leo chan <leo.chan@dwellproperty.ca>	FW: Community Fire – Overdue Invoices for Account #270826	
LIQ000160-0001	LIQ000159-0001	09/11/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40434	
LIQ000161-0001	LIQ000159-0001	09/12/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40544	
LIQ000162-0001	LIQ000159-0001	09/12/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40542	
LIQ000163-0001	LIQ000159-0001	09/16/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40758	
LIQ000164-0001	LIQ000159-0001	09/18/2024	Invoice	Community Fire Prevention	LMS 992 – Joyce Place	#40954	
LIQ000165-0001	LIQ000159-0001	10/17/2024	Letter	Lisa Frey [Lawson Lundell]	Patricia Williams-Gardner [Community Fire Prevention]	Re LMS 922 - Joyce Place c/o Dwell Property Management	
LIQ000166-0001	LIQ000166-0001	11/06/2024	Report			Condition Inspection Report	
LIQ000167-0001	LIQ000167-0001	11/08/2024	Report			Condition Inspection Report	
LIQ000168-0001	LIQ000168-0001	11/18/2024	Email	Jordan Hayward [Safeco Systems Ltd.]	<rsaucier@safecosystems.com>	RE: Joyce Place in Vancouver	
LIQ000169-0001	LIQ000169-0001	11/18/2024	Email	Tetsu Takagaki [Crowe Mackay]	<rsaucier@safecosystems.com>	RE: Joyce Place in Vancouver	
LIQ000170-0001	LIQ000170-0001	11/18/2024	msg	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	<rsaucier@safecosystems.com>	RE: Joyce Place in Vancouver	
LIQ000171-0001	LIQ000171-0001	11/18/2024	msg	<rsaucier@safecosystems.com>	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	RE: Joyce Place in Vancouver	
LIQ000172-0001	LIQ000171-0001	09/01/2024	Invoice	Safeco Systems Ltd.	Joyce Place [LMS 992]; Dwell Property Management	Safeco_Systems_Ltd._Invoice_Credit_9-9-2024_14527.pdf	
LIQ000173-0001	LIQ000173-0001	12/10/2024	msg	peter roberts (3158) - 14flr <proberts@lawsonlundell.com>	jillian sych (3327) - 17flr <jsych@lawsonlundell.com>	FW: Joyce Place in Vancouver - Safeco invoice	
LIQ000174-0001	LIQ000174-0001	12/06/2024	msg	<rsaucier@safecosystems.com>	tetsu takagaki' <tetsu.takagaki@crowemackay.ca>	RE: Joyce Place in Vancouver	Litigation and Solicitor-Client;Solicitor-Client
LIQ000175-0001	LIQ000174-0001	00/00/0000	png			image014.png	
LIQ000176-0001	LIQ000176-0001	01/16/2025 17:	msg	paul good <pgood@rdh.com>	tetsu takagaki <tetsu.takagaki@crowemackay.ca>	Joyce Place Townhouse review - Draft Report - Rev 1	
LIQ000177-0001	LIQ000176-0001	01/16/2025	Report	Paul Good [RDH Building Science Inc.]	Tetsu Takagaki [Crowe Mackay & Company Ltd.]	Re 2024 Townhouse Review - Revision 1	
LIQ000178-0001	LIQ000178-0001	09/18/2024	Invoice	Community Fire Prevention	LMS 992 - Joyce c/o RE/MAX dWell	#40954	

LIQ000179-0001	LIQ000179-0001	09/00/2024	Work Order	Community Fire Prevention	270826 - LMS 992 - Joyce Place c/o RE/MAX dWell		
LIQ000180-0001	LIQ000180-0001	09/12/2024	Invoice	Community Fire Prevention	LMS 992 - Joyce c/o RE/MAX dWell	#40544	
LIQ000181-0001	LIQ000181-0001	09/08/2024	Work Order	Community Fire Prevention	270826 - LMS 992 - Joyce Place c/o RE/MAX dWell		
LIQ000182-0001	LIQ000182-0001	09/11/2024	Invoice	Community Fire Prevention	LMS 992 - Joyce c/o RE/MAX dWell	#40434	
LIQ000183-0001	LIQ000183-0001	09/08/2024	Work Order	Community Fire Prevention	270826 - LMS 992 - Joyce Place c/o RE/MAX dWell		
LIQ000184-0001	LIQ000184-0001	09/16/2024	Invoice	Community Fire Prevention	LMS 992 - Joyce c/o RE/MAX dWell	#40758	
LIQ000185-0001	LIQ000185-0001	09/09/2024	Work Order	Community Fire Prevention	270826 - LMS 992 - Joyce Place c/o RE/MAX dWell		
LIQ000186-0001	LIQ000186-0001	09/12/2024	Invoice	Community Fire Prevention	LMS 992 - Joyce c/o RE/MAX dWell	#40542	
LIQ000187-0001	LIQ000187-0001	09/08/2024	Work Order	Community Fire Prevention	270826 - LMS 992 - Joyce Place c/o RE/MAX dWell		

BEGBATES	DATE	TYPE	GROUNDS FOR PRIVILEGE
LIQ000199-0001	10/31/2022	msg	Solicitor - Client
LIQ000200-0001	09/23/2019	Report	Solicitor - Client
LIQ000201-0001	11/22/2022	msg	Without Prejudice
LIQ000202-0001	01/08/2023	msg	Solicitor - Client
LIQ000203-0001	01/18/2023	msg	Solicitor - Client
LIQ000204-0001	02/05/2023	msg	Solicitor - Client
LIQ000205-0001	03/15/2023	msg	Solicitor - Client
LIQ000206-0001	03/15/2023	Letter	Solicitor - Client
LIQ000207-0001	03/15/2023	Letter	Solicitor - Client
LIQ000208-0001	03/15/2023	Letter	Litigation;Solicitor - Client
LIQ000209-0001	05/15/2023	msg	Solicitor - Client
LIQ000210-0001	07/12/2023	msg	Solicitor - Client
LIQ000211-0001	07/12/2023	Letter	Solicitor - Client
LIQ000212-0001	07/12/2023	Letter	Solicitor - Client
LIQ000213-0001	10/23/2023	msg	Solicitor - Client
LIQ000214-0001	11/27/2023	msg	Contemplation of Litigation;Solicitor - Client
LIQ000215-0001	00/00/0000	Memo	Contemplation of Litigation;Solicitor - Client
LIQ000216-0001	11/27/2023	msg	Litigation;Solicitor - Client
LIQ000217-0001	06/23/2023	Letter	Litigation;Solicitor - Client
LIQ000218-0001	07/12/2023	Letter	Litigation;Solicitor - Client
LIQ000219-0001	07/12/2023	Letter	Litigation;Solicitor - Client
LIQ000220-0001	10/24/2023	msg	Litigation;Solicitor - Client
LIQ000221-0001	09/28/2023	Report	Litigation;Solicitor - Client
LIQ000222-0001	07/11/2024	msg	Solicitor - Client
LIQ000223-0001	02/14/2024	Land Title Document	Solicitor - Client
LIQ000224-0001	02/14/2024	Land Title Document	Solicitor - Client
LIQ000225-0001	02/14/2024	Land Title Document	Solicitor - Client
LIQ000226-0001	04/29/2024	Land Title Document	Solicitor - Client
LIQ000227-0001	04/29/2024	Land Title Document	Solicitor - Client
LIQ000228-0001	04/29/2024	Land Title Document	Solicitor - Client
LIQ000229-0001	07/10/2024	Letter	Solicitor - Client
LIQ000230-0001	08/21/2024	msg	Solicitor - Client
LIQ000231-0001	09/09/2024	Agreement	Solicitor - Client
LIQ000232-0001	00/00/0000	Agreement	Solicitor - Client
LIQ000233-0001	09/03/2024	msg	Litigation;Solicitor - Client
LIQ000234-0001	09/17/2024	msg	Litigation;Solicitor - Client
LIQ000235-0001	09/17/2024	msg	Litigation;Solicitor - Client
LIQ000236-0001	09/17/2024	msg	Litigation;Solicitor - Client
LIQ000237-0001	09/17/2024	msg	Litigation;Solicitor - Client
LIQ000238-0001	09/17/2024	msg	Litigation;Solicitor - Client
LIQ000239-0001	09/17/2024	msg	Litigation;Solicitor - Client
LIQ000240-0001	10/11/2024	msg	Solicitor - Client
LIQ000241-0001	10/11/2024	msg	Solicitor - Client
LIQ000242-0001	01/24/2020	Report	Solicitor - Client
LIQ000243-0001	10/21/2024	msg	Solicitor - Client
LIQ000244-0001	11/18/2024	msg	Solicitor - Client
LIQ000245-0001	09/09/2024	msg	Solicitor - Client

LIQ000246-0001	11/20/2024	msg	Contemplation of Litigation;Without Prejudice
LIQ000247-0001	11/20/2024	msg	Contemplation of Litigation;Without Prejudice
LIQ000248-0001	01/22/2025	msg	Litigation;Solicitor - Client



This is Exhibit " K " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026.

A Commissioner for taking Affidavits for British Columbia.

NO. S246230
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INTRACORP VANNESS LIMITED PARTNERSHIP

PLAINTIFF

AND

THE OWNERS, STRATA PLAN LMS992, and CROWE MACKAY & COMPANY LTD., AS LIQUIDATOR OF THE OWNERS, STRATA PLAN LMS992

DEFENDANTS

AND:

INTRACORP VANNESS LIMITED PARTNERSHIP

DEFENDANT BY WAY OF COUNTERCLAIM

NOTICE OF APPLICATION

Name of Applicant: Crowe MacKay & Company Ltd. as Liquidator of the Owners, Strata Plan LMS992

To: The Plaintiff, Intracorp Vanness Limited Partnership

TAKE NOTICE that an application will be made by the Applicant to the presiding judge at the Courthouse at 800 Smithe Street, in the City of Vancouver, in the Province of British Columbia on Thursday, the 23rd day of October, 2025 at 9:45 am for the orders set out in Part 1 below.

The Applicant estimates that the application will take two (2) hours.

☐ This matter is within the jurisdiction of an Associate Judge.

☒ This matter is not within the jurisdiction of an Associate Judge.

Part 1: ORDERS SOUGHT

1. Pursuant to Rule 9-7, an order that the plaintiff/defendant by counterclaim Intracorp Vanness Limited Partnership ("**Intracorp**") pay to Crowe MacKay & Company Ltd., court confirmed liquidator of The Owners, Strata Plan LMS992, (the "**Liquidator**") the sum of $3,195,129.29, plus pre-judgment interest thereon from and after September 9, 2024.

2. Costs of this application and proceeding to be paid by Intracorp to the Liquidator.

3. Such further and other relief as this Honourable Court may deem just.

Part 2: FACTUAL BASIS

A. Overview

4. This summary trial application arises out of a dispute following the completion of the sale to the Plaintiff, Intracorp Vanness Limited Partnership as purchaser, ("**Intracorp**") of the strata complex of The Owners, Strata Plan LMS992 (the "**Joyce Place Strata**").

5. The Joyce Place Strata was a strata development referred to as "Joyce Place" ("**Joyce Place**"), located at 3380 Vanness Avenue, Vancouver, BC. Joyce Place was a mixed-use 63-unit strata property.

6. By agreement dated January 11, 2021, Intracorp Acquisition Co Ltd.[1] and the Joyce Place Strata entered into a conditional Purchase and Sale Agreement (the "**PSA**") for the sale to Intracorp of the Joyce Place Strata lands and buildings (the "**Joyce Place Property**").

---

[1] By Notice of Assignment dated August 25, 2021, Intracorp Acquisition Co Ltd. assigned the PSA to the Plaintiff, Intracorp Vanness Limited Partnership, as purchaser. For the purposes of this application, they will be collectively referred to as "Intracorp".

7. On July 7, 2021, the Joyce Place Strata members resolved at a special general meeting (the "SGM") to wind-up the strata and appoint the Liquidator pursuant to Part 16, Division 2 of the *Strata Property Act*, S.B.C. 1998 c. 43 (the "*SPA*"). At the SGM, the Joyce Place Strata members also approved the PSA pursuant to section 282 of the *SPA*.

8. By order granted October 19, 2022, the court confirmed the wind-up of the Joyce Place Strata, approved the appointment of the Liquidator and approved the PSA.

Affidavit #1 of E. Allegretto ("**Allegretto #1**"), Ex. B.

B. Purchase Price Adjustment Terms

9. The terms of the PSA include Schedule G which sets out a formula by which a purchase price adjustment ("**PPA**") was to be calculated and paid to the Joyce Place Strata owners. The PPA is calculated based on the aggregate BC Assessment values of all the residential units in six "Comparable Developments" measured at two different points in time.

10. Schedule G identifies the six "Comparable Developments" as follows:

> (c) "**Comparable Developments**" means all of the following developments:
>
> (i) Regent Court- 3489 Ascot Place, Vancouver, BC (Strata Plan LMS 1558);
>
> (ii) Nexus - 3588 Crowley Drive, Vancouver, BC (Strata Plan BCS 404);
>
> (iii) Wall Central Park- 5515 Boundary Road, Vancouver, BC (Strata Plan EPS3434);
>
> (iv) Tower-2689 Kingsway, Vancouver, BC (Strata Plan EPS2285);
>
> (v) Centro- 3438 Vanness Avenue, Vancouver, BC (Strata Plan LMS3463); and

(vi) Circa- 3660 Vanness Avenue, Vancouver, BC (Strata Plan BCS2012);

Allegretto #1, Ex. A. (p. 43).

11. The formula for the calculation of the PPA is defined in Schedule G as follows:

> **"Purchase Price Increase"** means an amount equal to (A) the Purchase Price, multiplied by (B) the Aggregate Value Increase, multiplied by (C) sixty five percent (65%);

12. The Purchase Price under the PSA was $41,400,000.

13. Clause 3(b) of Schedule G defines "Aggregate Value Increase" to mean:

> . . .the percentage by which the Adjustment Date Aggregate Value exceeds the Reference Date Aggregate Value;

Allegretto #1, Ex. A. (p. 43).

14. Clause 3(a) of Schedule G defines "Adjustment Date Aggregate Value" to mean:

> . . . the aggregate assessed value of all of the Comparable Strata Lots as set out in the most recent property assessment notices issued by BC Assessment prior to the Value Adjustment Date for each of the Comparable Strata Lots (provided that, for greater certainty, the property assessment notices used to determine the Adjustment Date Aggregate Value will not be earlier than the property assessment notices used to determine the Reference Date Aggregate Value); (emphasis added)

15. The "Value Adjustment Date" is January 1, 2021.

16. Clause 3(d) of Schedule G defines "Comparable Strata Lots" to mean "all of the residential strata lots located within the Comparable Developments on both the Value Reference Date and the Value Adjustment Date."

17. Clause 3(f) of Schedule G defines "Reference Date Aggregate Value" to mean:

> . . . the aggregate assessed value of all of the Comparable Strata Lots as set out in the 2021 property assessment notices issued by BC Assessment (setting out property value as of July 1, 2020) for each of the Comparable Strata Lots;
> (emphasis added)

Allegretto #1, Ex. A. (p. 44).

18. Clause 3(g) of Schedule G defines "Value Adjustment Date" to mean "the date that is eighteen (18) months after the date on which the Vendor's Second Condition is satisfied. The Vendor's Second Condition was satisfied on July 8, 2022, making January 8, 2023 the "Value Adjustment Date".

Affidavit #1 of J. King ("**King #1**"), Ex. C.

19. As a result, the applicable BC Assessment values for use in determining the "Reference Date Aggregate Value" of the "Comparable Developments" are those issued for the Comparable Strata Lots on January 1, 2023 (setting the value as at July 1, 2022).

20. The aggregate value of Comparable Strata Lots in the six Comparable Developments on the Value Reference Date (January 1, 2021) is $733,472,908. This amount is the "Reference Date Aggregate Value".

King #1, para. 10, Ex. F.

21. The aggregate value of Comparable Developments on the Value Adjustment Date is $820,561,008.00. This amount is the "Adjustment Date Aggregate Value".

King #1, para. 11, Ex. G.

22. As a result, the Aggregate Value Increase is 11.873390148%, being "the percentage by which the Adjustment Date Aggregate Value exceeds the Reference Date Aggregate Value".

23. The "Purchase Price Increase" (the PPA) is therefore $3,195,129.29 ($41,400,000 x 11.873390148% x 65%).

King #1, para. 13.

C. Intracorp Disavows PPA

24. On September 9, 2024 (the "**Closing Date**"), the PSA completed and the Joyce Place Property was transferred by the Liquidator to Intracorp. Intracorp did not pay the PPA as part of tendering the purchase price.

Affidavit #2 of E. Allegretto ("**Allegretto #2**") #2, para. 11.

25. In advance of the Closing Date, Intracorp advised the Liquidator that it would not be paying a PPA. Specifically, Intracorp asserted that:

> . . .there is no increase to the Purchase Price pursuant to Schedule G of the Purchase Agreement, as there have been Comparable Development Changes with respect to each of the Comparable Developments, and accordingly, there are no Comparable Developments for the purposes of calculating the Adjustment Date Aggregate Value.

King #1, Ex. D.

26. Intracorp relied on clause 6 of Schedule G which states:

> If a Comparable Development Change (as defined below) for any Comparable Development occurs prior to the Value Adjustment Date, then such Comparable Development will be deemed to not be a Comparable Development for the purposes of this Schedule G and the Comparable Strata Lots within such Comparable Development will be excluded for the purposes of calculating the Reference Date Aggregate Value and the Adjustment Date Aggregate Value.

Allegretto #1, Ex. A, p. 43.

27. The term "Comparable Development Changes" is defined in Schedule G. The material portion of this definition relied upon by Intracorp states:

> In this Schedule G, **"Comparable Development Change"** means the occurrence of any of the following:

(a) any change or proposed change to the permitted use or redevelopment of any land within any Comparable Development (including, without limitation, any change or proposed change to the official community plan, zoning or any other City bylaw which affects the redevelopment potential of such land);

. . .

(g) there is any other change, event, fact or condition which causes the assessed value of Comparable Strata Lots with any Comparable Development to increase for reasons other than normal market conditions.

Allegretto #1, Ex. A. (p. 44).

28. Intracorp asserted that the following events constituted "Comparable Development Changes" which disqualified all six of the "Comparable Developments":

(a) the passage of the Vancouver Plan by City Council on July 22, 2022;

(b) The approval by the City of Vancouver (the "**City**") of

(i) a 5% increase to certain engineering fees that relate particularly to the development industry and a 2.3% increase to other engineering fees for 2022 on or about December 7, 2021;

(ii) a motion to update Vancouver's Development Cost Levy By-law on or about June 22, 2022; and

(iii) a 3.3% increase to engineering fees for 2023 on or about December 6, 2022;

(c) The City passed By-law No. 13345 on or about June 7, 2022, which made amendments respecting carbon emissions, air filtration, and included carbon limits to the Vancouver Building By-law, By-law No. 12511;

(d) The Greater Vancouver Water District's:

(i) Development Cost Charge Bylaw No. 353 2022 passed and finally adopted on June 24, 2022; and

(ii) Development Cost Charge Bylaw No. 257, 2022 passed and finally adopted on or about April 28, 2023;

(e) South Coast British Columbia Transportation Authority ("**TransLink**") passed:

(i) Bylaw No. 143-2021 on or about September 23, 2021, imposing development cost charges for the year 2022 and increasing the TransLink Development Cost Charge effective January 1, 2022;

(ii) Bylaw No. 144-2022 on or about March 24, 2022, amending the TransLink bylaw imposing property tax for the year 2022; and

(iii) Bylaw No. 145-2022 on or about March 24, 2022, increasing the property tax rates levied by TransLink effective January 1, 2022; and

(f) The COVID-19 epidemic.

(Collectively, the "**Alleged Changes**")

Amended Response to Counterclaim, paras. 8 to 12.

D. Invalidity of Intracorp Position

29. The Liquidator obtained affidavit evidence from BC Assessment and the opinion of a real estate planning and development expert in answer to the Alleged Changes. This evidence and opinion are independent and complete answers to Intracorp's assertion that there have been "Comparable Development Changes" to all of the "Comparable Developments" such that "there is no increase to the Purchase Price pursuant to Schedule G".

30. For this reason, the Liquidator submits a PPA of $3,195,129.29 was due from Intracorp on September 9, 2024 and remains payable.

a) BC Assessment

31. Both the "Adjustment Date Aggregate Value" and the "Reference Date Aggregate Value" are predicated on "property assessment notices issued by BC Assessment".

32. When determining the assessment value of the "Comparable Strata Lots" that are the induvial residential strata units making up the "Comparable Developments", BC Assessment did not make any value or assessment adjustments to reflect anything in the nature of the factors set out in section 7 of Schedule G.

Affidavit #1 of B. Murao, para. 6.

33. As a result, none of the Alleged Changes could have caused the assessed value of the Comparable Strata Lots to increase for reasons other than normal market conditions. Intracorp cannot rely on section 7(g) of Schedule G as justification for supporting that any of the "Comparable Developments" were the subject of a "Comparable Development Change".

b) No Change of Permitted Use or Redevelopment

34. Chuck Brook is a real estate planning and development expert. Mr. Brook provided an opinion dated September 12, 2025 (the "**Brook Opinion**").

King #1, Ex. B.

35. The Brook Opinion considers whether the market would have:

(a) considered it reasonably likely, or merely possible, that the Alleged Changes would occur;

(b) expected the Alleged Changes to be reasonably likely to change the permitted use, redevelopment or redevelopment potential of the "Comparable Strata Lots"; and

(c) considered the Alleged Changes to be capable of increasing the redevelopment potential so as to increase the market value of the Comparable Strata Lots.

36. Put another way, the Brooks Opinion assesses whether any of the Alleged Changes fit within section 7(a) or (g) of Schedule G as Comparable Development Changes. The Brooks Opinion concludes that none of the Alleged Changes were capable of changing the permitted use, redevelopment or redevelopment potential of or increasing the redevelopment potential so as to increase the market value of any of the Comparable Strata Lots. Indeed, the Brook Opinion notes that many of the Alleged Changes would, as a matter of fact, "diminish the residual land value by increasing development costs."

King #1, Ex. B. paras. 6.50 and 6.96.

37. As a result, the Alleged Changes asserted by Intracorp are factually incapable of amounting to a "Comparable Development Change" as defined in Schedule G of the PSA. Therefore, Intracorp has no sustainable grounds, as a matter of contract, to exclude any of the "Comparable Development s" from use in the calculation of the PPA.

Part 3: LEGAL BASIS

38. The Liquidator relies on Rule 9-7 of the *Supreme Court Civil Rules* and on the inherent jurisdiction of the Court.

A. The Issues Are Suitable for Summary Disposition

39. Alternatively, Rule 9-7 provides that, on hearing a summary trial application, the court may consider and weigh conflicting evidence and grant judgment in favour of any party, either on an issue or generally, unless the court is unable to find the necessary facts or is of the view that it would be unjust to do so.

Cepuran v. Carlton, 2022 BCCA 76 at paras. 149 – 150.

40. In deciding whether a matter is suitable for summary trial, the court may consider a number of factors including the amount involved, the complexity of the matter, its urgency, any prejudice likely to arise from delay, proportionality, the course of proceedings, and whether the evidence is sufficient to decide the dispute.

Cepuran, supra.

41. The Liquidator submits that this Court can and should determine this matter by way of summary trial. Intracorp's delay in paying the PPA to the Liquidator as part of completing its purchase of Joyce Place has prejudiced all the former owners. Each or those owners have been deprived of the use of part of the sale proceeds that they expected from the sale of their individual strata units.

42. The Liquidator has adduced evidence sufficient to allow the Court to determine, pursuant to the PSA:

(a) Whether the Alleged Changes constitute "Comparable Development Changes"; and

(b) The quantification of the amount of the PPA pursuant to Schedule G of the PSA.

43. These issues are factually simple, do not engage contested legal principles or conflicting evidence, and can be decided summarily on the affidavit evidence before the Court.

44. The issues raised on this application are suitable for summary trial. If the Liquidator is successful, that will dispose of this matter entirely before either party incurs further litigation costs.

45. A full trial to resolve this matter would result in unnecessary delay and costs to all parties. In particular, it prejudices the former owners of Joyce Place who have been denied their full share of the Purchase Price. The prejudice to the former owners is exacerbated by the fact that they are not parties to this action.

B. Entitlement to the PPA

46. As a matter of fact and contractual interpretation, none of the Alleged Changes are "Comparable Development Changes" as defined in section 7 of Schedule G of the PSA. For this reason, Intracorp is not entitled to exclude any (let alone all) of the "Comparable Developments" in the calculation of the PPA.

47. The goal of contractual interpretation is to ascertain the objective intent of the parties – a fact-specific goal – through the application of legal principles of interpretation. The court applies a practical, common-sense approach, the over-riding concern of which is to determine the intent of the parties and the scope of their understanding.

Sattva Capital Corp. v Creston Moly Corp., 2014 SCC 53, paras. 47 and 49.

48. Interpreting a negotiated commercial document must be done in a manner which avoids a commercial absurdity. The document must be construed in accordance with sound commercial principles and good business sense.

IFP Technologies (Canada) Inc. v EnCana Midstream and Marketing, 2017 ABCA 157, paras. 88-89.

49. The words of one provision must not be read in isolation but should be considered in harmony with the rest of the contract and in light of its purpose and commercial context. For this reason, the courts do not accept overly broad interpretations of price adjustment clauses.

Tercon Contractors Ltd. v. British Columbia (Transportation and Highways), 2010 SCC 4, para. 64;
Niebergal v QHR Technologies Inc., 2020 SKQB 327; afff'd 2022 SKCA 85.

50. The interpretation of Schedule G to the PSA must be undertaken in the context of the entire agreement and its surrounding context. That context included recognition by the parties that there would be a considerable amount of time between the date the PSA was signed (January 11, 2021) and the probable closing date

(ultimately September 9, 2024). The PPA was intended to adjust the purchase price in the event there was a meaningful rise in the market value of Joyce Place over that period of time.

51. The interpretation and application of the meaning of "Comparable Development Change" in clause 7(a) to (g) of Schedule G must therefore be undertaken in this context.

52. In the context of this transaction, the types of "Comparable Development Change" set out in clause 7(a) to (g) of Schedule G are to be qualified by the phrase in section 7(g) requiring that the asserted change "causes the assessed value of Comparable Strata Lots with (*sic*) any Comparable Development to increase for reasons other than normal market conditions."

53. In claiming the Alleged Changes all qualified as "Comparable Development Change", Intracorp relies on sections 7(a) and (g) of Schedule G. Intracorp asserts that section 7(a) of Schedule G is unmodified by section 7(g), meaning that any "changes or proposed changes to land use plans and bylaws applicable to" the Comparable Developments is a Comparable Development Change justifying exclusion. As all the Comparable Developments have been subject to "changes or proposed changes to land use plans and bylaws", even though they have no effect on value or redevelopment potential, all the Comparable Developments are excluded such that "no Purchase Price increase is payable."

Amended Response to Counterclaim, paras. 21-25.

54. This is an overly broad and absurd interpretation. Acceding to this interpretation effectively renders the PPA unenforceable as it would allow Intracorp to raise (as it has done) trivial "Comparable Development Changes" to justify the exclusion of all the Comparable Developments from use in calculating the PPA.

55. The only reasonable interpretation of section 7(a) is that, like the basket section 7(g)[2], the "change or proposed change to the permitted use or redevelopment of any land" must "cause() the assessed value of Comparable Strata Lots . . . to increase for reasons other than normal market conditions." Section 7(g) begins with the words "there is any other change, event, fact or condition which causes . . . "(emphasis added). As a result of using these words, the qualification in section 7(g) that the "change, event, fact or condition" must result in an increase in market value for "reasons other than normal market conditions" is operative for each of the circumstances set out in Sections 7(a) to (f).

56. To interpret section 7(a) absent that qualification makes it commercially absurd. Such an interpretation means, for example, that a change (or just a possible change) to a bylaw governing signage on the Comparable Developments would exclude them even though it would have no material impact on the "permitted use or redevelopment" of the Comparable Developments.

57. The calculation of the PPA is a mathematical formula predicated on the aggregate assessment values of all the Comparable Strata Lots of the "Comparable Developments". The assessment values to be used are published by an independent third party: BC Assessment. The applicable valuation dates are known and uncontested: being January 1, 2021 and January 1, 2023.

58. Based on the BC Assessment data, the value of the "Purchase Price Increase" (the PPA) is $3,195,129.29.

59. The Liquidator seeks judgment against Intracorp for the amount of the PPA, plus pre-judgment interest thereon and costs.

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[2] "7(g) there is any other change, event, fact or condition which causes . . . "(emphasis added)

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

60. Affidavit #1 of E. Allegretto filed September 9, 2024 (excluding exhibits C, D and E).

61. Affidavit #1 of B. Murao made August 14, 2025.

62. Affidavit #2 of T. Takagaki, made September 17, 2025.

63. Affidavit #1 of J. King, made October 2, 2025.

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

(a) file an Application Response in Form 33,

(b) file the original of every affidavit, and every other document, that

(i) you intend to refer to at the hearing of this application, and

(ii) has not already been filed in the proceeding, and

(c) serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:

(i) a copy of the filed Application Response;

(ii) a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on that person;

(iii) if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7(9).

Dated at the City of Vancouver, in the Province of British Columbia, this 3rd day of October, 2025.

Lawson Lundell LLP
Solicitors for the Applicant, Crowe MacKay & Company Ltd. as Liquidator of the Owners, Strata Plan LMS992

This Notice of Application is filed by Peter J. Roberts, K.C./Jordan Hayward, of the law firm of Lawson Lundell LLP, whose place of business and address for delivery is 1600 – 925 West Georgia Street, Vancouver, British Columbia, V6C 3L2, e-mail address: proberts@lawsonlundell.com; telephone number: 604-685-3456.

To be completed by the court only:

Order made

☐ in the terms requested in paragraphs _____ of Part 1 of this Notice of Application

☐ with the following variations and additional terms:

_____

_____

_____

_____

Date:

_____

Signature of ☐Judge ☐Associate Judge

APPENDIX

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

THIS APPLICATION INVOLVES THE FOLLOWING:

- ☐ discovery: comply with demand for documents
- ☐ discovery: production of additional documents
- ☐ other matters concerning document discovery
- ☐ extend oral discovery
- ☐ other matter concerning oral discovery
- ☐ amend pleadings
- ☐ add/change parties
- ☐ summary judgment
- ☒ summary trial
- ☐ service
- ☐ mediation
- ☐ adjournments
- ☐ proceedings at trial
- ☐ case plan orders: amend
- ☐ case plan orders: other
- ☐ experts
- ☐ none of the above

NO. S246230
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INTRACORP VANNESS LIMITED PARTNERSHIP

PLAINTIFF

AND:

THE OWNERS, STRATA PLAN LMS992 ET AL.

DEFENDANTS

NOTICE OF APPLICATION

LAWSON LUNDELL LLP

Barristers & Solicitors
1600 Cathedral Place
925 West Georgia Street
Vancouver, British Columbia
V6C 3L2
Phone: (604) 685-3456
Attention: Peter J. Roberts, K.C.

PJR/acc2

This is Exhibit " L " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026.

A Commissioner for taking Affidavits for British Columbia.

CHUCK BROOK Real Estate Advisor
402-480 Robson Street
Vancouver, BC
V6B 1S1

September 12, 2025

Peter J. Roberts, K.C.
James D. Fraser
Lawson Lundell
Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, British Columbia
V6C 3L2

RE: **INTRACORP VANNESS LIMITED PARTNERSHIP v. THE OWNERS, STRATA PLAN MS992 (the "Strata Corporation") and CROWMACKAY & COMPANY LTD. AS LIQUIDATOR OF THE OWNERS, STRATA PLAN LMS992 SCBS ACTION No. 246230, VANCOUVER REGISTRY (the "Liquidator", the "Action")**

Dear Mr. Roberts and Mr. Fraser:

1.0 Terms of Engagement

1.1 You have requested that I provide expert assistance, consultative services and/or expert opinion evidence in the field of real estate development and planning (collectively, the "**Expert Services**") in relation to property described as 3380 Vanness Avenue, Vancouver, B.C. ("**Joyce Place**") for the purpose of the above-noted Action.

2.0 Credentials and Qualifications

2.1 I am a graduate architect and have been actively involved in providing advice and services in urban planning and development since 1975. After working as an urban planner with the City of Winnipeg, I joined the City of Vancouver (the "**City**") in 1986 as its Senior Development Planner. My planning responsibilities there were focused on major development permit and rezoning applications.

2.2 In 1988 I left the City and founded Brook Development Planning Inc. The firm provided planning and development advice and services to private and public sector clients throughout BC, as well as the US and Mexico. Since 2013, I have worked independently, specializing in real estate asset management plans and strategies, complex negotiations and project management. I also offer experience and advice on land use planning, rezoning and development permit applications. As such, I am fully familiar with current City zoning bylaws, planning policies and guidelines.

2.3 Over the course of my career, I have offered expert consultative services in relation to litigation, arbitration and property assessment appeals, often being qualified to give expert planning opinions. Past assignments include:

2.3.1 Expert witness services in relation to an arbitration concerning the determination of development potential of a large property in downtown Vancouver (2022-2023);

2.3.2 Expert advice in relation to litigation concerning the redevelopment of a large shopping centre property in New Westminster, B.C. (2023);

2.3.3 Expert advice in relation to litigation concerning the acquisition of strata units in a major residential redevelopment in Vancouver, B.C. (2018);

2.3.4 Expert witness services in relation to a BC Assessment Board appeal concerning the determination of development potential of an industrial-zoned property in Vancouver (2019-2020);

2.3.5 Expert advice in relation an expropriation of property owned by a strata corporation for purposes of constructing a portion of a rapid transit line in Vancouver, B.C. (2020);

2.3.6 Expert advice in relation to litigation concerning the potential redevelopment of residential properties in Vancouver, B.C. (2023);

2.3.7 Expert witness services in relation to litigation concerning a commercial lease dispute in Vancouver, B.C. (2015);

2.3.8 Expert advice in relation to litigation concerning redevelopment of residential properties, Vancouver, B.C. (2024), and

2.3.9 Expert witness services in relation to litigation concerning a residential subdivision in Royal Bay, B.C. (2021-2023)

2.4 My Curriculum Vitae is attached to this letter.

3.0 Assumed Facts

3.1 In preparing this opinion I have reviewed the documents set out in your letter of instruction dated May 21, 2025 and revised by your letter of July 4, 2025 (the "Revised Instructions").

3.2 My opinions are based on the following facts which you have instructed me to assume:

3.3 **The Purchase and Sale Agreement and Schedule G**

3.4 Intracorp Vanness Limited Partnership ("**Intracorp**") is the purchaser under a Purchase and Sale Agreement dated January 11, 2021, as assigned and amended from time to time (collectively, the "**Agreement**") respecting the sale of Joyce Place made in the context of a voluntary liquidation and winding up of The Strata Corporation pursuant to Division 2 of Part 16 of the Strata Property Act.

3.5 The purchase price ("**Purchase Price**") under the Agreement is $41,400,000.

3.6 Schedule G to the Agreement ("**Schedule G**") contains a mechanism by which the Purchase Price for the Property may be increased (the "**Purchase Price Increase**", the "**Purchase Price Increase Mechanism**") according to the formula prescribed in Schedule G if there is an increase in the assessed value of the strata lots (the "**Comparable Strata Lots**") in certain listed comparable developments (the "**Comparable Developments**") – and only those listed Comparable Developments – between the following two reference dates: the Value Reference Date, defined as January 1, 2021 (the "**Value Reference Date**"); and the Value Adjustment Date, being January 9, 2023 (the "**Value Adjustment Date**"), which is the date that is eighteen (18) months after the date on which the Vendor's Second Condition (as defined in the Agreement) was satisfied.

3.7 The Purchase Price Increase Mechanism operates as follows:

3.8 The following six strata developments in Vancouver are the Comparable Developments, with individual strata lots therein being the Comparable Strata Lots:

3.8.1 Regent Court – 3489 Ascot Place, Vancouver, BC (Strata Plan LMS 1558);

3.8.2 Nexus – 3588 Crowley Drive, Vancouver, BC (Strata Plan BCS 404);

3.8.3 Wall Central Park – 5515 Boundary Road, Vancouver, BC (Strata Plan EPS3434);

3.8.4 Skyway Tower – 2689 Kingsway, Vancouver, BC (Strata Plan EPS2285);

3.8.5 Centro – 3438 Vanness Avenue, Vancouver, BC (Strata Plan LMS3463); and

3.8.6 Circa – 3660 Vanness Avenue, Vancouver, BC (Strata Plan BCS2012);

3.9 The aggregate assessed value of all the Comparable Strata Lots as set out in BC Assessment's 2021 property assessment notices is the "**Reference Date Aggregate Value**";

3.10 The aggregate assessed value of all of the Comparable Strata Lots as set out in BC Assessment's most recent property assessment notices issued prior to the Value Adjustment Date (i.e., January 9, 2023) is the "**Adjustment Date Aggregate Value**";

3.11 The percentage by which the Adjustment Date Aggregate Value exceeded the Reference Date Aggregative Value is the "**Aggregate Value Increase**";

3.12 The Purchase Price Increase is an amount equal to:

Purchase Price x Aggregate Value Increase x 65%; and

3.13 If the Adjustment Date Aggregate Value is greater than the Reference Date Aggregate Value and the Aggregate Value Increase is greater than four percent (4%), then the Purchase Price increases by the amount of the Purchase Price Increase.

3.14 On or about August 15, 2024 the Liquidator demanded payment from Intracorp of a Purchase Price Increase calculated under Schedule G.

3.15 Section 6 of Schedule G provides that if a Comparable Development Change (as defined below) for any Comparable Development occurs prior to the Value Adjustment Date, such Comparable Development is no longer a Comparable Development under Schedule G and the Comparable Strata Lots within such

Comparable Development will be excluded for the purposes of calculating any Purchase Price Increase.

3.16 Sections 7(a) and 7(g) to Schedule G state that a "**Comparable Development Change**" means the occurrence of any of the following:

a. Any change or proposed change to the permitted use or redevelopment of any land within any Comparable Development (including, without limitation, any change or proposed change to the official community plan, zoning or any other City bylaw which affects the redevelopment potential of such land);

g. There is any other change, event, fact or condition which causes the assessed value of Comparable Strata Lots within any Comparable Development to increase for reasons other than normal market conditions.

3.17 Intracorp alleges that prior to the Value Adjustment Date there were several Comparable Development Changes that apply to all the Comparable Developments. As a result, pursuant to section 6 of Schedule G, each of the Comparable Developments is deemed not to be a Comparable Development and the Comparable Strata Lots therein are excluded under Schedule G, and, accordingly, there is no Purchase Price Increase payable by Intracorp, as alleged or at all.

3.18 The Liquidator denies that any Comparable Development Change occurred so as to eliminate Intracorp's liability to make the Purchase Price Increase.

4.0 The Alleged Comparable Development Changes

4.1 Intracorp alleges that the following Comparable Development Changes are changes to land use plans or bylaws that occurred pursuant to section 7(a) of Schedule G prior to the Value Adjustment Date which affect all the Comparable Developments (the "**Alleged Changes**"):

4.2 **Regulatory Changes**

4.3 Vancouver City Council approved the Vancouver Plan, a long-range land use plan, began implementing on or about July 22, 2022. A finalized draft of the Vancouver Plan was not made public until on or about April 5, 2022;

4.4 Vancouver City Council approved:

4.4.1 A 5% increase to certain engineering fees that relate particularly to the development industry and a 2.3% increase to other engineering

fees for 2022 on or about December 7, 2021. The report recommending this increase was first made to City Council on or about November 3, 2021;

4.4.2 A motion to update Vancouver's Development Cost Levy By-law on or about June 22, 2022. The report recommending the Vancouver Development Cost Levy Bylaw was first made to City Council on or about June 8, 2022; and

4.4.3 A 3.3% increase in engineering fees for 2023 on or about December 6, 2022. The report recommending this increase was first made to City Council on or about November 2, 2022;

4.5 City Council passed By-law No. 13345 on or about June 7, 2022, which made amendments respecting carbon emissions, air filtration, and included carbon limits to the Vancouver Building By-law, By-law No. 12511;

4.6 The Greater Vancouver Water District's:

4.6.1 Development Cost Charge Bylaw No. 353 2022 was given a first, second, and third reading on or about March 25, 2022, approved on or about May 4, 2022, and passed and finally adopted on June 24, 2022; and

4.6.2 Development Cost Charge Bylaw No. 257, 2022 was approved at first and second reading on or about October 28, 2022, and was subsequently passed and finally adopted on or about April 28, 2023; and

4.7 South Coast British Columbia Transportation Authority ("**TransLink**") passed:

4.7.1 Bylaw No. 143-2021 on or about September 23, 2021, imposing development cost charges for the year 2022 and increasing the TransLink Development Cost Charge effective January 1, 2022;

4.7.2 Bylaw No. 144-2022 on or about March 24, 2022, amending the TransLink bylaw imposing property tax for the year 2022; and

4.7.3 Bylaw No. 145-2022 on or about March 24, 2022, increasing the property tax rates levied by TransLink effective January 1, 2022.

(collectively, the "**Alleged Regulatory Changes**").

4.8 COVID-19's Effect on Market Conditions

4.8.1 The COVID-19 pandemic and the governmental response thereto is also a Comparable Development Change which caused the assessed value of Comparable Strata Lots within the Comparable Developments to increase for reasons other than normal market conditions, as contemplated by section 7(g) of Schedule G.

4.8.2 The COVID-19 pandemic and governmental response thereto resulted in an increase in real estate activity and prices between January 1, 2021, and January 8, 2023, beyond normal market conditions, thereby falling within the definition of Comparable Development Change in section 7(g).

4.8.3 Throughout 2021, the City's housing market activity and real estate prices began to rise as the vacancy rate began to fall. Supply chain disruptions, construction delays, and labour shortages caused by the COVID-19 pandemic and the governmental response thereto affected the real estate industry, contributing to and exacerbating these trends, which continued through to the Value Adjustment date in January 2023.

4.8.4 While the COVID-19 Pandemic was known at the Value Reference Date, the unprecedented shortage of housing supply, increasing demands for housing, and corresponding increase in housing prices beyond normal market conditions are all changes, events, facts, or conditions which occurred between the Value Reference Date and the Value Adjustment Date, and therefore a Comparable Development Change as defined in section 7(g) of Schedule G.

(the "**Alleged COVID-19 Change**")

4.9 Intracorp alleges that no Purchase Price Increase is payable to the Strata Corporation, as alleged or at all, because the above-noted Alleged Regulatory Changes and the Alleged COVID-19 Change are Comparable Development Changes that result in there being no Comparable Developments.

5.0 Documents Reviewed

5.1 In preparing this Opinion, I have reviewed and relied on the following documents:

5.1.1 Pleadings provided to me by counsel including: Response to Civil Claim of Intracorp, Response to Counterclaim of Intracorp, Amended Counterclaim of Joyce Place and Response to Amended Counterclaim of Intracorp;

5.1.2 City of Vancouver, Vancouver Plan 2050 Adopted by Vancouver City Council on July 22, 2022; (the **"Vancouver Plan"**)

5.1.3 City of Vancouver, Staff Report 2022 Engineering Fees, November 3, 2021; (the **"2022 Engineering Fees Report"**)

5.1.4 City of Vancouver, By-law to Amend Street and Traffic By-law No. 2849 Regarding 2022 Fee Increases and Miscellaneous Amendments, November 3, 2021; (the **"2022 Fee Increases Bylaw"**)

5.1.5 City of Vancouver, Staff Report Vancouver Development Cost Levy By-Law Update (2023-2032), June 8, 2022;
(the **"DCL Update Report"**)

5.1.6 City of Vancouver, By-law to Amend the Vancouver Development Cost Levy By-law Regarding Administrative and Levy Matters, June 8, 2022;
(the **"DCL Bylaw"**)

5.1.7 City of Vancouver Staff Report, 2023 Engineering Fees, November 22, 2022; (the **"2023 Engineering Fees Report"**)

5.1.8 City of Vancouver, DRAFT By-law to Amend Street and Traffic By-law No. 2849 Regarding 2023 Fee Increases and Other Miscellaneous Fee Amendments, November 22, 2022; (the **"2023 Engineering Fees Bylaw"**)

5.1.9 City of Vancouver Staff Report, Climate Emergency – Bylaw and Policy Updates Applicable to New Buildings, May 5, 2022 (the **"Climate Report"**)

5.1.10 City of Vancouver, DRAFT By-law 13345 A By-law to amend Building By-law No. 12511 regarding carbon emissions, air filtration, and embodied carbon limits, May 5, 2022 (the **"Climate Bylaw"**)

5.1.11Greater Vancouver Sewerage And Drainage District Staff Report Development Cost Charge Rate Amending Bylaw No. 353, 2022; (the **"GVSDD DCC Report"**)

5.1.12 Greater Vancouver Sewerage and Drainage District Amending Bylaw No. 353, 2022 (Approved by the Inspector of Municipalities – not adopted) (the **"GVSDD Bylaw 353"**)

5.1.13 Greater Vancouver Water District Bylaw No. 257, 2022; (the **"GVWD Bylaw 357"**)

5.1.14 South Coast British Columbia Transportation Authority Bylaw Number 143-2021; (the **"Translink Bylaw 143"**)

5.1.15 South Coast British Columbia Transportation Authority Bylaw Number 144-2022; (the **"Translink Bylaw 144"**)

5.1.16 South Coast British Columbia Transportation Authority Bylaw Number 145-2022, and (the **"Translink Bylaw 145"**)

5.1.17 Bank of Canada: Our Covid-19 Policy Response: Policy actions, Web Page (the **"Bank of Canada Response"**)

6.0 Professional Expert Opinion

6.1 Under the Revised Instructions, you have asked me to answer the following questions, in each case indicating my answer and the basis for my answer (**the "Opinion"**):

6.1.1 **Question 1:** As of July 1 in the year prior to each of the 2022 and 2023 assessment years (the "**Assessment Date**"), or at any other time that I might consider relevant (collectively, the "**Reference Date**"), would the market have considered it reasonably likely, or merely possible, that the Alleged Regulatory Change or the Alleged COVID-19 Change would occur?

6.1.2 **Question 2:** As of the Reference Date, would the market have expected the Alleged Regulatory Change or the Alleged COVID-19 Change to be reasonably likely to change the permitted use, redevelopment, or redevelopment potential of the Comparable Strata Lots? And;

6.1.3 **Question 3:** As of the Reference Date, would the market have considered the Alleged Regulatory Change or the Alleged COVID-19 Change to be capable of increasing the redevelopment potential so as to increase the market value of the Comparable Strata Lots:

a. for reasons other than normal market conditions; and
b. sufficiently for the market to be able to isolate such increase from any increase that may be caused by normal market conditions; and
c. sufficiently for the market to be able to quantify the increase?

6.2 My independent objective opinion reflecting my answers to the Questions posed above is set out below and is arranged in the same order as the Alleged Comparable Development Changes set out in para 4 above.

6.3 **Alleged Regulatory Change: Vancouver Plan**

6.4 Allegation: Intracorp alleges that Vancouver City Council approved the Vancouver Plan, a long-range land use plan, which Vancouver City Council began implementing on or about July 22, 2022. A finalized draft of the Vancouver Plan was not made public until on or about April 5, 2022.

6.5 **Question 1**: As of July 1 in the year prior to each of the 2022 and 2023 assessment years (the "**Assessment Date**"), or at any other time that I might consider relevant (collectively, the "**Reference Date**"), would the market have considered it reasonably likely, or merely possible, that Vancouver City Council would have approved the Vancouver Plan on or about July 22, 2022?

6.6 As of the Reference Date of July 1, 2021 the market would have considered it reasonably likely that Vancouver City Council would have approved the Vancouver Plan on or about July 22, 2022 based on the extensive preparation and public consultation which preceded the approval by Council.

6.7 The Vancouver Plan was initiated by City of Vancouver staff in 2019. Its aim was to become a city-wide, unified framework to guide future land use, housing, transportation, and climate action. Its purpose was to replace a piecemeal patchwork of plans and policies. Public engagement commenced in 2020, with a focus on equity, affordability, climate resilience and reconciliation with indigenous communities. Scenario planning was undertaken in 2021.

6.8 While the market would have considered it reasonably likely that the adoption of the Vancouver Plan would occur, the Vancouver Plan conceptually illustrates but does not prescribe or otherwise provide details of the overall scale and breadth of land use and built form required for a development that would be based on regional strategies and City policies. The Vancouver Plan provides only general direction for plans, guidelines, and updating existing policies.

6.9 A key next step in the implementation of the Vancouver Plan is the creation of a City-Wide Official Development Plan (the ODP"), to be based on the guiding principles in the Vancouver Plan. The first Interim ODP is expected to be completed in June 2026.

Specific details such as block-level land uses, heights and densities, urban design requirements, infrastructure provision, services, and amenities are to be determined through area planning.

6.10 The Vancouver Plan clearly states that "the land use strategy in the Vancouver Plan does not serve as a rezoning enabling policy and does not create any development rights. The maps included in this document are for illustrative purposes only. They will be changed and refined in future phases of work."

6.11 **Question 2**: As of the Reference Date, would the market have expected the approval of the Vancouver Plan to be reasonably likely to change the permitted use, redevelopment, or redevelopment potential of the Comparable Strata Lots?

6.12 As of each of the Reference Dates of July 1, 2021 and July 1, 2022 the market would not have expected the adoption of the Vancouver Plan to be reasonably likely to change the permitted use, redevelopment, or redevelopment potential of the Comparable Strata Lots. My opinion on this is based on the Vancouver Plan's broad and platitudinous principles and its general and vague nature.

6.13 As noted earlier, the implementation of the Vancouver Plan requires the creation of a new ODP having the following additional components; none of which have yet to be developed and are currently in process:

6.13.1 City updated Regional Context Statement

6.13.2 Guidelines for Future Area Plans

6.13.3 Phasing Plan indicating sequencing of areas of growth and change (10-year plan and 30-year outlook)

6.13.4 City-wide Plan Monitoring Approach, including housing, employment space, greenhouse gas (GHG)/ ecological, and social needs targets

6.13.5 Additional City-wide maps including:

a. Current land use designations with density guidelines, including references to current rezoning policy
b. Maps of areas with specific development requirements, such as Ecologically Sensitive Zones, Hazardous Areas, Heritage Conservation Areas, and key infrastructure upgrades

6.13.6 Process for updating the Vancouver Plan

6.14 **Question 3**: As of the Reference Date, would the market have considered the approval of the Vancouver Plan to be capable of increasing the redevelopment potential to increase the market value of the Comparable Strata Lots:

a. for reasons other than normal market conditions? No it would not - the Vancouver Plan applies city-wide and so any response to it would be a response to a normal market condition, not a non-market condition. As discussed, it is too vague to cause a change in development potential. Thus, it was not capable of increasing the redevelopment potential of the Comparable Strata Lots at all, let alone for reasons other than normal market conditions so as to increase the market value of the Comparable Strata Lots.
b. sufficiently for the market to be able to isolate such increase from any increase that may be caused by normal market conditions? No it would not. For reasons stated in 6.8 above, the market would not be able to isolate such increase from any increase that may be caused by normal market conditions, if indeed any occurred;
c. sufficiently for the market to be able to quantify the increase? No it would not. For reasons stated in 6.8 above, the market would not be able to quantify the increase that may be caused by the Vancouver Plan beyond a change caused by normal market conditions, if indeed any occurred.

6.15 In summary, the general and non-specific nature of the Vancouver Plan, which is intended to form the basis of the City's first ODP, is such that there is there no potential of increasing the redevelopment potential so as to increase the market value of the Comparable Strata Lots.

6.16 In any event, the Vancouver Plan is not tailored to any specific area nor any particular property but applies City-wide.

6.17 **Alleged Regulatory Change: City of Vancouver, By-law to Amend Street and Traffic By-law No. 2849 Regarding 2022 Fee Increases and Miscellaneous Amendments, November 3, 2021 (the "2022 Fee Increases Bylaw")**

6.18 Allegation: Intracorp alleges that Vancouver City Council approved a 5% increase to certain engineering fees that relate particularly to the development industry and a 2.3% increase to other engineering fees for 2022 on or about December 7, 2021. The report recommending this increase was first made to City Council on or about November 3, 2021;

6.19 **Question 1:** As of the Reference Date, would the market have considered it reasonably likely, or merely possible, that Vancouver City Council would enact the 2022 Fee Increases Bylaw?

6.20 As of the Reference Date of July 1, 2021 the market would not have been aware of the 2022 Fee Increases Bylaw, as the staff report and draft bylaw had not been released to the public. The market would have been aware of the 2022 Fee Increases Bylaw by the Reference Date of July 1, 2022.

6.21 The City of Vancouver reviews its permit fees on an annual basis as part of the budget process. Fees are set at a level which reflects the City's cost structure and are typically adjusted on an annual basis to keep pace with costs.

6.22 Development Related Engineering Fees (Rezoning, Development, Building and Other Related Permits) Engineering fees are included in the Street and Traffic by-law, the Encroachment by-law and the Crossing by-law and were adjusted by 5.0% to cover incremental cost increases related to salary and benefits increases, including:

6.22.1 Street and Sidewalk Usage Fees

6.22.2 Sidewalk Inspection Fees

6.22.3 Building Site Construction Crossing and other Crossing Fees

6.23 **Question 2:** As of the Reference Date, would the market have expected the enactment of the 2022 Fee Increases Bylaw to be reasonably likely to change the permitted use, redevelopment, or redevelopment potential of the Comparable Strata Lots?

6.24 No. As of either Reference Date, the market would not have expected City engineering fees to be reasonably likely to change the permitted use or redevelopment or redevelopment potential of the Comparable Strata Lots and they did not do so.

6.25 The above engineering fees related to the development industry and the 2.3% increase to other engineering fees would have a negligible impact on overall project costs, when compared to the cost of land acquisition, construction, financing and marketing.

6.26 **Question 3**: As of the Reference Date, would the market have considered the enactment of the 2022 Fee Increases Bylaw to be capable of increasing the redevelopment potential so as to increase the market value of the Comparable Strata Lots:

a. for reasons other than normal market conditions? No as of either Reference Date, it would not. Amendments to engineering fees would have been a regular and common market condition.
b. sufficiently for the market to be able to isolate such increase from any increase that may be caused by normal market conditions? For reasons

stated in 6.24 above, the market would not be able to isolate such increase from any increase that may be caused by normal market conditions;

c. sufficiently for the market to be able to quantify the increase? For reasons stated in 6.24 above, the market would not be able to quantify the increase that may be caused by the 2022 Fee Increases Bylaw beyond a change caused by normal market conditions.

6.27 In any event, these fee increases associated with the adoption by Council of 2022 Fee Increases Bylaw would not contribute to an increase in land value as they would, in fact, by marginally increasing the costs of a development, result in a minor reduction in land value.

6.28 **Alleged Regulatory Change: City of Vancouver, By-law to Amend the Vancouver Development Cost Levy By-law Regarding Administrative and Levy Matters, June 8, 2022 (the "DCL Bylaw")**

6.29 Allegation: Intracorp alleges that Vancouver City Council approved a motion to update Vancouver's Development Cost Levy By-law on or about June 22, 2022. The report recommending the Vancouver Development Cost Levy Bylaw was first made to City Council on or about June 8, 2022.

6.30 **Question 1:** As of the Reference Date, would the market have considered it reasonably likely, or merely possible, that the DCL Bylaw would have been approved by Vancouver City Council?

6.31 As of the Reference Date of July 1, 2021 the market would not have been aware of the 2022 DCL Bylaw, as the staff report and draft bylaw had not been released to the public. The market would have been aware of the 2022 DCL Bylaw by the Reference Date of July 1, 2022.

6.32 Beginning in 2009, Council adopted the annual inflationary DCL rate adjustment system for the City-wide DCLs ("**CWDCL**") and Area-Specific DCL ("**ASDCL**"), with the new rates effective on September 30 of each year.

6.33 The City undertakes a comprehensive review of DCLs every four years to align with the Capital Planning cycle. The last comprehensive review of the CWDCL was undertaken in 2017. The Utilities DCL ("**UDCL**") was introduced in 2018.

6.34 **Question 2**: As of the Reference Date, would the market have expected the approval of the DCL Bylaw by Vancouver City Council to be reasonably likely to change the permitted use, redevelopment, or redevelopment potential of the Comparable Strata Lots?

6.35 No. The market would not have expected the DCLs to be reasonably likely to change the permitted use or redevelopment or redevelopment potential of the Comparable Strata Lots.

6.36 Based on feedback received from development stakeholders, the City decided to phase-in the increase of DCLs over two years, where 50% of the increase would be effective September 30, 2022, and the remaining 50% increase would be effective September 30, 2023. This phase-in allowed more time for the development industry to adjust to and factor in the increased DCL rates in their land acquisition and development.

6.37 The "**DCL Update Report**" dated June 8, 2022 states that "Coriolis Consulting tested the rates on several hypothetical development sites and determined that the proposed DCL rates would not impact development viability."

6.38 The increases were phased in two halves on September 30, 2022 and September 30, 2023. The second 50% of the increase occurred after the "Value Adjustment Date" of January 8, 2023.

6.39 City staff confirmed that the two-stage approach would not compromise development feasibility.

6.40 **Question 3**: As of the Reference Date, would the market have considered the approval of the DCL Bylaw to be capable of increasing the redevelopment potential so as to increase the market value of the Comparable Strata Lots:

a. for reasons other than normal market conditions? No as of either of the Reference Dates, it would not. Amendments to DCLs would be a regular and common market condition.
b. sufficiently for the market to be able to isolate such increase from any increase that may be caused by normal market conditions? For reasons stated in 6.32 above, the market would not be able to isolate such increase from any increase that may be caused by normal market conditions;
c. sufficiently for the market to be able to quantify the increase? For reasons stated in 6.32 above, the market would not be able to quantify the increase that may be caused by the DCL Bylaw beyond any change that may be caused by normal market conditions.

6.41 Development Cost Levies or other cost charges would be a typical aspect of real estate development. Particularly where such costs apply City-wide, any resulting change in the market value of the Comparable Strata Lots would be a response to a normal market condition.

6.42 The DCL Bylaw would not account for any increase in land value, as it would be a factor (albeit so small as to be inconsequential) in the reduction of residual land value by very incrementally increasing development costs.

6.43 **Alleged Regulatory Change: City of Vancouver, By-law to Amend Street and Traffic By-law No. 2849 Regarding 2023 Fee Increases and Other Miscellaneous Fee Amendments, November 22, 2022 (the "2023 Engineering Fees Bylaw")**

6.42 Allegation: Intracorp alleges that Vancouver City Council approved a 3.3% increase to engineering fees for 2023 on or about December 6, 2022. The report recommending this increase was first made to City Council on or about November 2, 2022.

6.43 **Question 1**: As of the Reference Date, would the market have considered it reasonably likely, or merely possible, that the 2023 Fee Increases Bylaw would have been approved by Vancouver City Council?

6.44 As of either Reference Date of July 1, 2021 or July 1, 2022 the market would not have been aware of the 2023 Fee Increases Bylaw, as the staff report and draft bylaw had not been released to the public.

6.45 The City of Vancouver reviews its permit fees on an annual basis as part of the budget process. Fees are set at a level which reflects the City's cost structure and are typically adjusted on an annual basis to keep pace with costs.

6.46 Development Related Engineering Fees (Rezoning, Development, Building and Other Related Permits) are included in the Street and Traffic by-law, the Encroachment by-law and the Crossing by-law and were adjusted to cover incremental cost increases related to salary and benefits increases, including:

6.46.1 Street and Sidewalk Usage Fees

6.46.2 Sidewalk Inspection Fees

6.46.3 Building Site Construction Crossing and Crossing Fees

6.47 **Question 2**: As of the Reference Date, would the market have expected Council approval of the 2023 Engineering Fees Bylaw to be reasonably likely to change the permitted use, redevelopment, or redevelopment potential of the Comparable Strata Lots?

6.48 No. As of either Reference Date, the market would not have expected the City engineering fees to be reasonably likely to change the permitted use or redevelopment or redevelopment potential of the Comparable Strata Lots.

6.49 The Schedule of Fees and Costs appended to the 2023 Engineering Fees Bylaw indicates that such charges are miniscule in nature, in the context of the overall cost of redevelopment of a property.

6.50 In any event, the 2023 Engineering Fees Bylaw would not contribute to an increase in land value, but instead would diminish (in only so small an amount as to be inconsequential) residual land value by increasing development costs.

6.51 **Question 3**: As of the Reference Date, would the market have considered Council approval of the 2023 Fee Increases Bylaw to be capable of increasing the redevelopment potential so as to increase the market value of the Comparable Strata Lots:

a. for reasons other than normal market conditions? No, as of either Reference Date, it would not. Amendments to engineering fees would be a regular and common market condition.
b. sufficiently for the market to be able to isolate such increase from any increase that may be caused by normal market conditions? For reasons stated in 6.45 above, the market would not be able to isolate such increase from any increase that may be caused by normal market conditions;
c. sufficiently for the market to be able to quantify the increase? For reasons stated in 6.45 above, the market would not be able to quantify the increase that may be caused by the 2023 Engineering Fees Bylaw beyond any change that may be caused by normal market conditions.

6.52 In any event, these fee increases associated with the 2023 Fee Increases Bylaw would not contribute to an increase in land value as they would, in fact, by marginally increasing the costs of a development, result in a minor reduction in land value.

6.53 **Alleged Regulatory Change: City of Vancouver, By-law 13345 A By-law to amend Building By-law No. 12511 regarding carbon emissions, air filtration, and embodied carbon limits, May 5, 2022 (the "Climate Bylaw")**

6.54 Allegation: Intracorp alleges that Vancouver City Council approved By-law No. 13345 on or about June 7, 2022, which made amendments respecting carbon emissions, air filtration, and included carbon limits to the Vancouver Building By-law, By-law No. 12511

6.55 **Question 1:** As of the Reference Date would the market have considered it reasonably likely, or merely possible, that the Climate Bylaw would have been approved by Vancouver City Council?

6.56 As of the Reference Date of July 1, 2021 the market would not have been aware of the Climate Bylaw, as the staff report and draft bylaw had not been released to the public. The market would have been aware of the 2022 Climate Bylaw by the Reference Date of July 1, 2022.

6.57 The Climate By-law came into effect on July 1, 2023, after the Valuation Adjustment Date of January 9, 2023.

6.58 The City of Vancouver *Climate Emergency Action Plan*, approved in 2020, sets a goal of reducing embodied carbon in construction by 40% by 2030. In May 2022, City Council approved changes to the Vancouver Building By-law to require designers to calculate, limit, and later reduce, embodied carbon in certain new buildings. The amendments are intended to reduce the carbon emissions limit for new 4-6 storey residential buildings, and to require air filtration. Initial limits on embodied carbon apply only to assembly, business and industrial uses.

6.59 The following provisions of the bylaw apply to new multifamily and commercial buildings:

6.58.1 Achieve Council's climate emergency goal of zero emissions heating and hot water in new buildings by 2025;

6.58.2 Require filtered outdoor air in new buildings beginning in 2023, helping to protect residents from the health impacts of traffic and wildfire-related air pollution;

6.58.3 Require cooling for new multifamily homes beginning in 2025, helping to protect residents from the health impacts of heat, air pollution, and noise, and

6.58.4 Introduce the first whole-building embodied carbon building by-law requirements in North America to begin reducing carbon emissions from materials and construction by 2025, as a means of achieving a 40% reduction by 2030.

6.60 The Climate Bylaw changes also include air filtration and cooling requirements, to reduce exposure to increased frequency of extreme heat events.

6.61 The Building By-law changes are intended to achieve the Climate Emergency Action Plan goal of zero emissions heating and hot water in new buildings by 2025. The proposed changes for 2023 included a reduction in carbon emissions limits (known

as the Greenhouse Gas Intensity or GHGI) for 4-6 storey residential buildings, with the same reduction for all commercial and 7+ storey residential buildings for 2025.

6.62 The difference in timelines recognizes that taller buildings require longer design and construction lead times. A Building By-law change in 2023 for 7+ storey buildings would have likely caused significant redesign and scheduling issues for buildings that are already well into their design and development processes.

6.63 **Question 2**: As of the Reference Date, would the market have expected the approval by Vancouver City Council of the Climate Bylaw to be reasonably likely to change the permitted use, redevelopment, or redevelopment potential of the Comparable Strata Lots?

6.64 No. As of either Reference Date, the market would not have expected the Climate Bylaw to be reasonably likely to change the permitted use or redevelopment of the Comparable Strata Lots.

6.65 The City retained a consultant to undertake a design and cost estimation study (the "**Study**") to determine the cost implications of the proposed changes. The Study found that construction costs would be expected to increase by 0.1% to 1.6% which is not a material amount.

6.66 City staff estimated financial impacts on new development to be negligible, as "the economics of development in Vancouver are based on multiple factors, with construction costs being just one of many."

6.67 The Study noted that the changes would not impact construction costs. Consultation with industry experts and material suppliers confirmed this to be the case.

6.68 Further, based on the Study's conclusion that the construction cost premium to meet the air filtration and cooling regulations would be in the range of only 0.1% to 3.5%, I conclude that the cost impact of air filtration and cooling regulation changes likewise had an immaterial impact on the value of the Comparable Strata Lots during the Value Adjustment Period.

6.69 The Climate Bylaw changes limiting embodied carbon were intended to assist designers in preparing for future reduction requirements in 2025. The Study noted that the changes would not impact construction costs.

6.70 The above-noted Bylaw amendments respecting carbon emissions, air filtration, and included carbon limits would therefore have been perceived by the market to have

had no negligible impacts on overall project costs, particularly in the context of land acquisition, construction, financing and marketing, and in turn, would not have materially contributed to an increase in land utility or value for the Comparable Strata Lots. Instead, by increasing development costs, they would marginally reduce residual land value.

6.71 **Question 3**: As of the Reference Date, would the market have considered the approval by Vancouver City Council of the Climate Bylaw to be capable of increasing the redevelopment potential so as to increase the market value of the Comparable Strata Lots:

a. for reasons other than normal market conditions? No, as of either Reference Dare, it would not. The approval by Vancouver City Council of the Climate Bylaw would have been considered as a normal market condition, as it applies city-wide.
b. sufficiently for the market to be able to isolate such increase from any increase that may be caused by normal market conditions; For reasons stated in 6.70 above, the market would not be able to isolate such increase from any increase that may be caused by normal market conditions;
c. sufficiently for the market to be able to quantify the increase? For reasons stated in 6.70 above, the market would not be able to quantify the increase that may be caused by the Climate Bylaw beyond any change that may be caused by normal market conditions.

6.72 Climate Report data from rezonings showed that all condo, and the majority of rental and non-market development, were already incorporating mechanical cooling.

6.73 In any event, since the amendments applied City-wide any resulting change in land value would be the result of a normal market change.

6.74 **Alleged Regulatory Change: GVSDD Board final adoption of Greater Vancouver Sewerage and Drainage District Amending Bylaw No. 353, 2022 (the "GVSDD Bylaw 353")**

6.75 Intracorp alleges that The Greater Vancouver Water District's Development Cost Charge Bylaw No. 353 2022 was given a first, second, and third reading on or about March 25, 2022, approved on or about May 4, 2022, and passed and finally adopted on June 24, 2022.

6.76 **Question 1:** As of the Reference Date, would the market have considered it reasonably likely, or merely possible, that the GVSDD Bylaw 353 would be given final adoption?

6.77 As of the Reference Date of July 1, 2021 the market would not have been aware of GVSDD Bylaw 353, as the staff report and draft bylaw had not been released to the public. The market would have been aware of GVSDD Bylaw 353 by the Reference Date of July 1, 2022.

6.78 GVSDD Bylaw 353 increased DCC's across the Greater Vancouver Regional District.

6.79 Completion of GVWD liquid waste infrastructure to meet the needs of growth in the region is based on funding from growth to pay for it. The rate increases, including interest, are intended to fund capital infrastructure from DCCs.

6.80 The most relevant charge relates to apartment units in Vancouver, which rose to $ 1,988/unit from $ 1,072/unit, an increase of 86%.

6.81 **Question 2**: As of the Reference Date, would the market have expected the final adoption of GVSDD Bylaw 353 to be reasonably likely to change the permitted use, redevelopment, or redevelopment potential of the Comparable Strata Lots?

6.82 No. As of either Reference Date, the market would not have expected ~~The~~ GVSDD Bylaw 353 to be reasonably likely to change the permitted use or redevelopment or redevelopment potential of the Comparable Strata Lots.

6.83 The increased charges under GVSDD Bylaw 353 would not have materially contributed to the cost of overall development in the context of land acquisition, construction, financing and marketing. In light of this, they would not have been expected to materially affect the value of the Comparable Strata Lots.

6.84 If anything, rather than increase land value, the additional charges would have decreased land value by increasing development costs.

6.85 **Question 3**: As of the Reference Date, would the market have considered final adoption of GVSDD Bylaw 353 to be capable of increasing the redevelopment potential so as to increase the market value of the Comparable Strata Lots:

a. for reasons other than normal market conditions? No, as of either Reference Date, it would not. Final adoption of GVSDD Bylaw 353 would have been considered as a normal market condition, as it applies city-wide.
b. sufficiently for the market to be able to isolate such increase from any increase that may be caused by normal market conditions? For reasons stated ~~in~~ 6.86 below, the market would not be able to isolate such increase from any increase that may be caused by normal market conditions;

c. sufficiently for the market to be able to quantify the increase? For reasons stated in 6.86 below, the market would not be able to quantify the increase that may be caused by GVSDD Bylaw 353 beyond any change that may be caused by normal market conditions.

6.86 Development Cost Charges (DCCs) would be a typical aspect of real estate development. In light of this, any change in Comparable Strata Lot land value resulting from a change in DCCs would be a response to normal market conditions.

6.87 **Alleged Regulatory Change: Greater Vancouver Water District Bylaw No. 257, 2022 (the "GVWD Bylaw 257")**

6.88 Intracorp alleges that The Greater Vancouver Water District's Development Cost Charge Bylaw No. 257, 2022 was approved at first and second reading on or about October 28, 2022, and was subsequently passed and finally adopted on or about April 28, 2023.

6.89 **Question 1:** As the Reference Dates, would the market have considered it reasonably likely, or merely possible, that GVWD Bylaw 257 would be given final adoption by the GVSDD Board?

6.90 As of either of the Reference Dates, the market would not have been aware of GVWD Bylaw 257, as the staff report and draft bylaw had not been released to the public.

6.91 **Question 2**: As of the Reference Date, would the market have expected final adoption of GVWD Bylaw 257 to be reasonably likely to change the permitted use, redevelopment, or redevelopment potential of the Comparable Strata Lots?

6.92 No. As of either Reference Date, the market would not have expected the GVWD Bylaw 257 to be reasonably likely to have changed the permitted use or redevelopment or development potential of the Comparable Strata Lots.

6.93 In setting development cost charges under Bylaw 257, as required by The Local Government Act, the GVWD considered:

6.93.1 Future land use patterns and development;

6.93.2 Phasing of works and services;

6.93.3 Provision of park land described in an official community plan;

6.93.4 How development designed to result in a low environmental impact may affect the capital costs of infrastructure;

6.93.5 Whether charges are excessive in relation to the capital cost of prevailing standards of service, and

6.93.6 Whether the charges will deter development, discourage construction of reasonably priced housing or the provision of reasonably priced serviced land, or discourage development designed to result in low environmental impacts.

6.94 The GVSDD was required by The Local Government Act to consider whether the DCC increase would deter development, discourage construction of reasonably priced housing or the provision of reasonably priced serviced land, or discourage development designed to result in low environmental impacts.

6.95 The most relevant charge under GVWD Bylaw 257 relates to apartment units in the City, which rose to $4,261/unit from $1,988/unit, an increase of 114%.

6.96 Rather than increasing land value, the additional charges would diminish residual land value by increasing development costs.

6.97 **Question 3**: As of the Reference Date, would the market have considered GVWD Bylaw 257 to be capable of increasing the redevelopment potential so as to increase the market value of the Comparable Strata Lots:

a. for reasons other than normal market conditions? No, as of either Reference Date, it would not. Final adoption of GVSDD Bylaw 257 would have been considered as a normal market condition, as it applies city-wide.
b. sufficiently for the market to be able to isolate such increase from any increase that may be caused by normal market conditions? For reasons stated in 6.98 below, the market would not be able to isolate such increase from any increase that may be caused by normal market conditions;
c. sufficiently for the market to be able to quantify the increase? For reasons stated in 6.98 below, the market would not be able to quantify the increase that may be caused by GVSDD Bylaw 257 beyond any increase that may be caused by normal market conditions.

6.98 As with the earlier-discussed regulatory changes, any change in land value of the Comparable Strata Lots caused by GVWD Bylaw 257 would have been a response to a normal market change.

6.99 **Alleged Regulatory Change: South Coast British Columbia Transportation Authority Bylaw Number 143-2021 (the "Translink Bylaw 143")**

6.100 Intracorp alleges that South Coast British Columbia Transportation Authority ("**TransLink**") passed Bylaw No. 143-2021 on or about September 23, 2021, imposing development cost charges for the year 2022 and increasing the TransLink Development Cost Charge effective January 1, 2022

6.101 **Question 1:** As of the Reference Date, would the market have considered it reasonably likely, or merely possible, that TransLink would have passed Bylaw No. 143-2021?

6.102 As of the Reference Date of July 1, 2021 it is possible that the market would have anticipated that Bylaw No. 143-2021 would have been adopted following the summer break. The market would have been aware of Bylaw No. 143-2021 by the Reference Date of July 1, 2022.

6.103 Translink has authority to impose DCLs to provide funds to assist in paying for the capital costs of providing transit infrastructure.

6.104 In setting development cost charges under Bylaw 143-2021, the Board of Translink considered, as required by The Local Government Act:

6.104.1 Future land use patterns and development;

6.104.2 Phasing of works and services;

6.104.3 Provision of park land described in an official community plan;

6.104.4 How development designed to result in a low environmental impact may affect the capital costs of infrastructure;

6.104.5 Whether charges are excessive in relation to the capital cost of prevailing standards of service, and; How development designed to result in a low environmental impact may affect the capital costs of infrastructure;

6.104.6 Whether the charges will deter development, discourage construction of reasonably priced housing or the provision of reasonably priced serviced land, or discourage development designed to result in low environmental impacts.

6.105 **Question 2**: As of the Reference Date, would the market have expected Translink Bylaw 143 to be reasonably likely to change the permitted use, redevelopment, or redevelopment potential of the Comparable Strata Lots?

6.106 No. As of either reference date, the market would not have expected Translink Bylaw 143 to be reasonably likely to change the permitted use or redevelopment or redevelopment potential of the Comparable Strata Lots.

6.107 The most relevant charge relates to apartment units in Vancouver, which was set at $1,554/unit.

6.108 The Translink board was required by The Local Government Act to consider whether the DCL would deter development, discourage construction of reasonably priced housing or the provision of reasonably priced serviced land, or discourage development designed to result in low environmental impacts.

6.109 The DCL would have had a negligible impact on overall project costs, when compared to land acquisition, construction, financing and marketing.

6.110 Rather than increasing Comparable Strata Lot land value, these DCLs would have reduced residual land value by increasing development costs.

6.111 **Question 3**: As of the Reference Date, would the market have considered Translink Bylaw 143 to be capable of increasing the redevelopment potential so as to increase the market value of the Comparable Strata Lots:

a. for reasons other than normal market conditions? No. As of either reference date, it would not. Passage of Translink Bylaw 143 would have been considered as a normal market condition, as it applies city-wide.
b. sufficiently for the market to be able to isolate such increase from any increase that may be caused by normal market conditions; For reasons stated in 6.112 below, the market would not be able to isolate such increase from any increase that may be caused by normal market conditions;
c. sufficiently for the market to be able to quantify the increase? For reasons stated in 6.112 below, the market would not be able to quantify the increase that may be caused by Translink Bylaw 143 beyond any increase that may be caused by normal market conditions..

6.112 As noted, DCLs and other cost charges would be a typical aspect of real estate development and any Comparable Strata Lot land value change resulting from them would be a response to normal market conditions.

6.113 **Alleged Regulatory Change: South Coast British Columbia Transportation Authority Bylaw Number 144-2022 (the "Translink Bylaw 144")**

6.114 Intracorp alleges that South Coast British Columbia Transportation Authority ("**TransLink**") passed Bylaw No. 144-2021 on or about March 24, 2022, amending the TransLink bylaw imposing property tax for the year 2022.

6.115 **Question 1:** As of the Reference Date would the market have considered it reasonably likely, or merely possible, that the Translink would have passed Bylaw 144?

6.116 As of the Reference Date of July 1, 2021 the market would not have been aware of Bylaw No. 144-2021, as the staff report and draft bylaw had not been released to the public. The market would have been aware of Bylaw No. 144-2021 by the Reference Date of July 1, 2022.

6.117 Under The South Coast British Columbia Transportation Authority Act, Translink may, by bylaw, levy property tax on the net taxable value of land and improvements. In levying this tax the Authority must adopt a variable tax rate in which individual tax rates are determined and imposed for each property class.

6.118 **Question 2**: As of the Reference Date, would the market have expected Translink's passage of Bylaw 144 to be reasonably likely to change the permitted use, redevelopment, or redevelopment potential of the Comparable Strata Lots?

6.119 No. As of either Reference Date, the market would not have expected Translink Bylaw 144 to be reasonably likely to change the permitted use or redevelopment or redevelopment potential of the Comparable Strata Lots.

6.120 The most relevant tax rate (in Dollars of Tax Per $1,000) relates to the Residential land use classification, which was set 0.2239.

6.121 Property tax would not typically be a determinant of land value. It would be a factor that a developer must consider, as property taxes would have contributed to carrying costs; however, rather than increasing land value, property taxes would have reduced land value by increasing development costs.

6.122 **Question 3**: As of the Reference Date, would the market have considered Translink Bylaw 144 to be capable of increasing the redevelopment potential so as to increase the market value of the Comparable Strata Lots:

a. for reasons other than normal market conditions? No. As of either Reference Date, it would not. Passage of Translink Bylaw 144 would have been considered as a normal market condition, as it applies city-wide.
b. sufficiently for the market to be able to isolate such increase from any increase that may be caused by normal market conditions? For reasons stated in 6.123 below, the market would not be able to isolate such increase from any increase that may be caused by normal market conditions;
c. sufficiently for the market to be able to quantify the increase? For reasons stated in 6.123 below, the market would not be able to quantify the increase that may be caused by Translink Bylaw 144 beyond any increase that may be caused by normal market conditions.

6.123 Property tax increases would be a typical aspect of real estate development and any Comparable Strata Lot land value change resulting from them would be a response to normal market conditions.

6.124 Property tax would not typically be a determinant of land value. It would be a factor that a developer must consider, as property taxes would have contributed to carrying costs; however, rather than increasing land value, property taxes would have reduced land value by increasing development costs.

6.125 **Alleged Regulatory Change: South Coast British Columbia Transportation Authority passage of Bylaw Number 145-2022 (the "Translink Bylaw 145")**

6.126 Intracorp alleges that South Coast British Columbia Transportation Authority ("**TransLink**") passed Bylaw No. 145-2022 on or about March 24, 2022, increasing the property tax rates levied by TransLink effective January 1, 2022.

6.127 **Question 1:** As the Reference Date, would the market have considered it reasonably likely, or merely possible, that the Translink would have passed Bylaw 145?

6.128 As of the Reference Date of July 1, 2021 the market would not have been aware of Bylaw No. 145-2021, as the staff report and draft bylaw had not been released to the public. The market would have been aware of Bylaw No. 145-2022 by the Reference Date of July 1, 2022.

6.129 Under The South Coast British Columbia Transportation Authority Act, Translink may, by bylaw, levy property tax on the net taxable value of land and improvements. In levying this tax the Authority must adopt a variable tax rate in which individual tax rates are determined and imposed for each property class.

6.130 **Question 2**: As of the Reference Date, would the market have expected the passage of Translink Bylaw 145 to be reasonably likely to change the permitted use, redevelopment, or redevelopment potential of the Comparable Strata Lots?

6.131 No. As of either Reference Date, the market would not have expected Translink Bylaw 145 to be reasonably likely to change the permitted use or redevelopment of land.

6.132 The tax on residential use category (in Dollars of Tax Per $1,000) relates to the Residential land use classification, which was actually reduced to 0.002.

6.133 Property tax would not typically be a determinant of land value. It would be a factor that a developer would properly have considered as having contributed to carrying costs; however, rather than increasing land value, property taxes would have reduced land value by increasing development costs.

6.134 **Question 3**: As of the Reference Date, would the market have considered Translink Bylaw 145 to be capable of increasing the redevelopment potential so as to increase the market value of the Comparable Strata Lots:

a. for reasons other than normal market conditions? No, as of either Reference Date, it would not. Passage of Translink Bylaw 145 would have been considered as a normal market condition, as it applies city-wide.
b. sufficiently for the market to be able to isolate such increase from any increase that may be caused by normal market conditions? For reasons stated in 6.135 below, the market would not be able to isolate such increase from any increase that may be caused by normal market conditions;
c. sufficiently for the market to be able to quantify the increase? For reasons stated in 6.135 below the market would not be able to quantify the increase that may be caused by Translink Bylaw 145 beyond any increase that may be caused by normal market conditions.

6.135 Property tax increases would be a typical aspect of real estate development and any Comparable Strata Lot land value change resulting from them would be a response to normal market conditions.

6.136 **Alleged Change: COVID-19's Effect on Market Conditions**

6.137 Intracorp alleges that:

6.137.1 The COVID-19 pandemic and the governmental response thereto is also a Comparable Development Change which caused the assessed value of Comparable Strata Lots within the Comparable Developments to increase for reasons other than normal market conditions, as contemplated by section 7(g) of Schedule G;

6.137.2 The COVID-19 pandemic and governmental response thereto resulted in an increase in real estate activity and prices between January 1, 2021, and January 8, 2023, beyond normal market conditions, thereby falling within the definition of Comparable Development Change in section 7(g);

6.137.3 Throughout 2021, the City's housing market activity and real estate prices began to rise as the vacancy rate began to fall. Supply chain disruptions, construction delays, and labour shortages caused by the COVID-19 pandemic and the governmental response thereto affected the real estate industry, contributing to and exacerbating these trends, which continued through to the Value Adjustment date in January 2023; and

6.137.4 While the COVID-19 Pandemic was known at the Value Reference Date, the unprecedented shortage of housing supply, increasing demands for housing, and corresponding increase in housing prices beyond normal market conditions are all changes, events, facts, or conditions which occurred between the Value Reference Date and the Value Adjustment Date, and therefore a Comparable Development Change as defined in section 7(g) of Schedule G.

6.138 **Question 1**: As the Reference Date, would the market have considered it reasonably likely, or merely possible, that the COVID-19's Effect on Market Conditions would occur?

6.139 From the outset of the epidemic, the market would have considered it reasonably likely that COVID-19 would have an effect, albeit unknown, on Market Conditions.

6.140 In my opinion the only consequence of COVID-19 of potential material significance to the strata redevelopment market was the action taken at the beginning of the COVID-19 pandemic in 2020 by the Bank of Canada to support the economy by reducing its overnight lending rate (policy interest rate) in a series of emergency cuts:

7.140.1 March 4, 2020: Rate cut of 50 basis points (0.50%) from 1.75% to 1.25%

7.140.2 March 13, 2020 (unscheduled/emergency cut), rate cut of 50 basis points (0.50%) from 1.25% to 0.75%

7.140.3 March 27, 2020 (another emergency cut), Rate cut of 50 basis points (0.50%) from 0.75% to 0.25% (the "**Bank of Canada Response**").

6.141 **Question 2**: As of the Reference Date, would the market have expected COVID-19 or the Bank of Canada Response to be reasonably likely to change the permitted use, redevelopment, or redevelopment potential of the Comparable Strata Lots?

6.142 No. As of either Reference Date, the market would not have expected COVID-19 or the Bank of Canada Response to be reasonably likely to change the permitted use or redevelopment or redevelopment potential of the Comparable Strata Lots.

6.143 The Bank of Canada Response cuts would have significantly lowered commercial bank interest rates, thereby increasing the buying power of prospective purchasers. This in turn would have played a part in stimulating the overall real estate market.

6.144 **Question 3**: As of the Reference Date, would the market have considered The Bank of Canada Response to be capable of increasing the redevelopment potential so as to increase the market value of the Comparable Strata Lots:

a. for reasons other than normal market conditions? No, as of either Reference Date, it would not. Increases in land values resulting from reductions in interest rates in Canada would have been a normal market condition, as prime rate adjustments occur regularly over the span of development projects.
b. sufficiently for the market to be able to isolate such increase from any increase that may be caused by normal market conditions? No. While The Bank of Canada Response can be identified as a significant factor in stimulating the housing market and contributing to an increase in demand for housing, thereby potentially increasing the value of the Comparable Strata Lots, the reduction in interest rates would have been but one of many factors potentially influencing land values and a normal market condition affecting the whole market.
c. sufficiently for the market to be able to quantify the increase? No. It would not be possible to isolate COVID-19 generally or The Bank of Canada Response in particular as a reasonably likely stimulant of any increase in Comparable Strata Lot land values. Other factors such as immigration patterns, in- and out-migration of Vancouver residents, construction delays and labour shortages, working from home, and other patterns - several of which are intangible – would also have influenced and potentially stimulated land values.

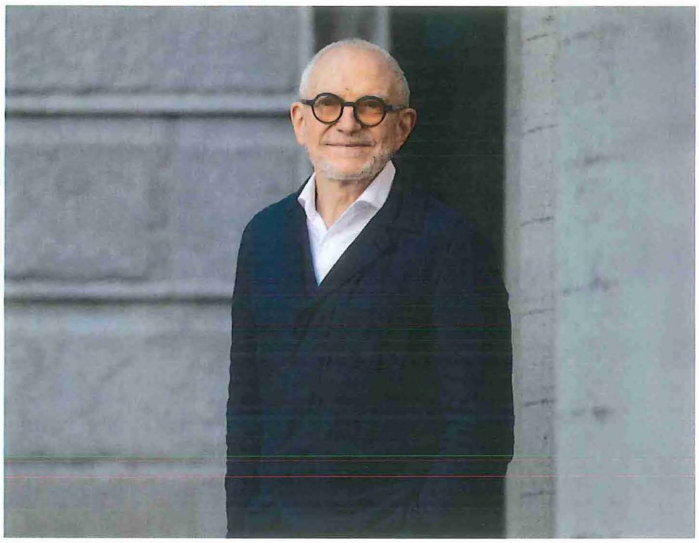
7.0 My Duty as an Expert

7.1 I am aware of my role and duty as an independent and impartial witness and have prepared this letter in conformity with my Duty of Independence. If called to give testimony, I will give such testimony in accordance with those duties.

Sincerely,
CHUCK BROOK Real Estate Advisor

Chuck Brook
604.250-2289
chuck@chuckbrook.com

CHUCK BROOK, Principal
Chuck Brook Real Estate Advisor, Inc.



Chuck Brook brings four decades of experience in development planning in both the private and public sectors. He is a widely recognized expert in preparing and securing approvals for large, mixed-use, multi-phase master plans and development applications, and in designing and implementing public engagement strategies. Specialty areas include: development advice for land holdings; asset strategies for public land portfolios; high-level land use negotiations; and, expert witness services.

Chuck joined the City of Vancouver in 1986 as Senior Development Planner. In 1988, he founded Brook Development Planning Inc., a consultancy that managed or contributed to numerous development and rezoning applications, including on large, multi-phase urban waterfront and transit-oriented projects. Since 2013, Chuck has worked independently as an advisor to private- and public-sector clients, specializing in: real estate asset management plans and land-use strategies; feasibility studies; site identification, assessment and selection; and complex negotiations.

A past director of the Urban Development Institute and member of the Squamish Nation Advisory Design Panel, Chuck has a Masters in Architecture and Urban Design from the University of Manitoba.

EDUCATION
Master of Architecture (M. Arch.) University of Manitoba 1975

Bachelor of Environmental Studies *(BES)*
University of Manitoba 1970

LANGUAGES
English and French

EXPERIENCE

Chuck Brook Real Estate Advisor
Principal
2013 - Present

Brook Pooni Associates Inc. Founder / Principal
1988 – 2012

Hancock Nicolson Brook Architects + Planners Principal
1987 -1988

City of Vancouver
Senior Development Planner
1986-1987

City of Winnipeg
Urban Design Coordinator 1984-1986

City of Winnipeg
Urban Design Planner 1980 -1984

AFFILIATIONS

Member
Urban Development Institute

Member
Lamda Alpha International

Crowe

This is Exhibit " M " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026.

A Commissioner for taking Affidavits for British Columbia.

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VIA EMAIL & MAIL

November 9, 2022

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

Dear Sir/Madam:

RE: STRATA WINDUP – STRATA PLAN LMS 992
NOTICE TO OWNERS AND UPDATE FROM LIQUIDATOR

We write to the Owners of Strata Plan LMS992 (the "**Owners**") to provide, among other things, an update on the wind-up and court ordered sale process of the Joyce Place Strata located at 3362-3376, 3378, 3380, 3382 and 3384 Vanness Avenue (collectively, "**Joyce Place**").

As you are aware, the Owners held a special general meeting to consider resolutions (the "**Wind-Up Resolutions**") to wind-up Joyce Place and appoint Crowe MacKay & Company Ltd. ("**CMCO**" or 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 October 19, 2022, Justice Marzari issued Reasons of Judgment in the wind-up petition commenced by the Owners whereby all of the orders sought including the confirmation of the wind-up of Joyce Place and confirmation of CMCO as Liquidator for Joyce Place. As such, the Liquidator now has authority over the affairs of Joyce Place.

Copies of the pleadings including the aforesaid Order will be published on the Liquidator's website at www.joyceplacestrata.com in due course.

The Liquidator understands that the Owners have entered into a purchase and sale agreement (the **"PSA"**) with Intracorp Acquisition Co. Ltd. on or about January 11, 2021 for the sale of Joyce Place. The Liquidator's legal counsel, Lawson Lundell LLP, is presently reviewing the PSA and will prepare a summary of the key terms including an estimated timeline for the completion of the sale. This will be distributed to the Owners at a later date.

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. The Liquidator also intends to continue working alongside with the strata council as it relates to the day-to-day management of the strata, preservation/protection of Joyce Place and a successful sale of same.

That said, the Liquidator was made aware that Joyce Place presently does not have any insurance whatsoever with respect to property or general liability coverage. This is a direct contravention to the *Strata Property Act* and the Liquidator obviously has concerns with respect to the potential exposure to significant liability while the property remains uninsured. The Liquidator does have the ability to obtain insurance and the Liquidator is working with Mr. Chan to obtain proposals from insurance brokers for same. The Liquidator hopes to be in a position to provide greater details as to the terms of any such insurance policy at a later date.

Should you have any questions or concerns, please contact the Liquidator's office at joyceplace@crowemackay.ca.

Yours very truly,

CROWE MACKAY & COMPANY LTD.
in its capacity as Court Appointed Liquidator of
The Owners, Strata Plan LMS 992 and not in its personal capacity

per:

Mr. Derek Lai, CPA, CMA, CIRP, LIT, CFE

Encl.

This is Exhibit " N " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026.

A Commissioner for taking Affidavits for British Columbia.

Additional Information Density Bonus

Q: Can "non-market" housing be included in the calculation of the "Density Bonus set out in Schedule F of the PSA?

A: The short answer is **"no"**: 'non-market' housing units required by the City of Vancouver ("**COV**") as part of any Intracorp development of Joyce Place are not included for the purposes of calculating the Density Bonus.

The "Density Bonus" is a formula based on what the "Permitted FSR" and the "Lands Area" are calculated to be. Both of those are predicated on the "maximum floor space ratio". The definition of "Permitted FSR" specifically excludes two types of floor areas "from the computation of floor area" that may be used in calculating the "Permitted FSR" . Those express exclusions are:

a. "all amenities, facilities and other areas that are to be excluded in the computation of floor area pursuant to the Rezoning Bylaw or the Zoning and Development Bylaw"; and

b. "any areas which are subject to Non-Market Restrictions".

The term "Non-Market Restrictions" is defined to mean "any restrictions on rental rates, rental increases, selling price or tenure or any mandated affordability or tenant-eligibility or occupant eligibility requirements or any restrictive covenant or housing agreement containing any such provisions". We assume for the purposes of this opinion that the COV will require "non-market" housing in the Joyce Place development as part of permitting it. We also assume that this "non-market" housing will be subject to "Non-Market Restrictions" as defined in Schedule F of the PSA. This assumption is realistic as, if it were not so, then the term "Non-Market Restrictions" would likely have no practical application or meaning as a term of Schedule F. The COV will also likely require "amenities, facilities and other areas" that are not residential space to be part of the development (i.e., recreation room, meeting rooms, etc.). Both these types of floor area (non-market housing and "amenities") are not to be included in the calculation of the "Permitted FSR" or the "Lands Area".

The conclusion that "non-market" housing units are excluded from the calculation of the Density Bonus is supported by other terms in Schedule F. For example, the defined terms "Market Rental Units" and "Market Strata Lots" both support the concept of a clear distinction between "market" and "non-market" units within the proposed development. Both the vendor (the Joyce Place strata) and the purchaser (Intracorp) would have been objectively alive to this distinction at the time the PSA was executed. Further, clause 4(c) of the Schedule F also draws this distinction. It says:

> "no Density Bonus or other amount will be payable under this Schedule F with respect to any component of any new development on the Lands other than the Market Strata Lots and the Market Rental Units" (emphasis added)

For these reasons, we do not think there is a viable argument to compel the inclusion of anything except "Market Rental Units" and "Market Strata Lots" in calculating the Density Bonus.

Q: Will the Density Bonus Be Triggered?

A: The short answer is also **"no":** on the current plans and zoning, the Density Bonus will not be payable, even on an expansive definition of "Permitted FSR" and the "Lands Area". In discussions with Colliers, they ran some calculations based on the figure of a total 11.18 FSR for the residential component as set out in the COV report from November 14, 2023, assuming that the commercial and (now) market daycare were to be included in the density calculations for purpose of the Density Bonus. Colliers arrived at the following conclusions on the applicable FSR:

1. Currently, with 10% below market rental of the residential space, the FSR for "Market Rental Units" and "Market Strata Lots" is 10.062 FSR (market rental) + 0.32 FSR (commercial) = **10.382 FSR**; and

2. Assuming the current amendment Intracorp is seeking from COV is approved in its entirety, and 20% of the residential becomes 'below market', the FSR for "Market Rental Units" and "Market Strata Lots" would then be 8.944 FSR (market rental) + 0.32 FSR (commercial) = **9.264 FSR.**

Neither of these figures exceed the Density Bonus threshold of 10.5 FSR for "*Both Market Strata Lots and Market Rental Units*" in Schedule F of the PSA. As a result, unless the Intracorp plans change materially, there is little likelihood a Density Bonus will ever be payable.

Q: What Are Next Steps?

A: As a result, the Liquidator is of the opinion that the currently proposed holdback of $350,000 should instead largely be distributed now to the owners as part of the payout of the PPA settlement funds and the special levy. The only holdback now required is to cover the costs to have the Liquidator's accounts passed and obtain a court order discharging the Liquidator.

Accordingly, the cheque enclosed with this letter contains all or nearly all of the proceeds owners can likely expect to receive.

This is Exhibit " O " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026.

A Commissioner for taking Affidavits for British Columbia.

Crowe MacKay & Company Ltd.
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November 21, 2022 Invoice No. 405981

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

Dear Sir/Madam:

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
FIRST BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING NOVEMBER 14, 2022

Billing on account for professional services rendered with respect to the court ordered liquidation of The Owners, Strata Plan LMS 992 (the "Strata"). The services rendered during the period up to November 14, 2022 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP, and/or the property management company, Dwell Property Management ("Dwell"), with respect to the following:
  - court ordered liquidation;
  - supporting affidavits, petition and other materials;
  - reviewing petition and other materials;
  - notice of appeal;
  - newspaper advertisement;
  - listing of creditors;
  - townhouse structural issues;
  - temporary showing;
  - engineering reports and other documents relating to the condition of the property;
  - insurance and related matters;
  - City of Vancouver (the "COV") unsafe order;
  - websites for windup;
  - purchase and sale agreement (the "PSA");
  - timeline for the completion of sale;
  - financing related matters;
  - special levy funds;
  - strata property management service agreement;
  - general updates on the wind-up;
  - assistance for day-to-day management of the Strata;

  - next steps; and,
  - several other matters.

- Reviewing pleadings and other documents relating to the court ordered liquidation;
- Reviewing documents in relation to the appeal filed by certain commercial units;
- Creating websites for the liquidation and publishing updates to same;
- Reviewing documents relating to the condition of the property including, but not limited to, engineering reports from MGH Consulting Inc., Apex Building Sciences Inc. and RDH Building Science Inc.;
- Preparing and publishing advertisements in local newspaper and Gazette;
- Attending a meeting with members of the strata council, Dwell and Lawson Lundell LLP;
- Preparing and issuing formal notice to owners;
- Reviewing previous insurance policy for the property;
- Numerous discussions and correspondence with the listing broker, Colliers, with respect to, among other things, particulars of windup, appointment of counsel, prospective purchaser, PSA, special general meeting, special resolution, liquidator appointment, lack of property insurance, general liability insurance, COV concerns and several other matters;
- Numerous discussions and correspondence with CapriCMW with respect to, among other things, particulars of windup, appointment of Liquidator, necessity for insurance immediately, request for insurance proposals, temporary shoring on townhouses, condition of property, reports from engineers, documentation required for insurer, immediate concerns, and several other matters;
- Numerous discussions and correspondence with RDH Building Science with respect to, among other things, particulars of windup, appointment of Liquidator, condition of townhouses, temporary shoring, previous reports issued to the Strata, immediate concerns, safety issues, work done to date, outstanding work remaining and several other matters;
- Various discussions and correspondence with the COV with respect to, among other things, appointment of Liquidator, property concerns, pending sale of the property, requirements to meet COV demands, and several other matters;
- Numerous discussions and correspondence with Dwell Property Management with respect to, among other things, strata council meetings, listing of creditors, insurance matters, property management agreement, general accounting matters, building condition/safety issues, COV demands, cash position of strata and several other matters;
- Numerous discussions and correspondence with owners with respect to the liquidation, appointment of Liquidator, status of the proceeding, website, pleadings available for download, building related issues, and several other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	29.45
	Jonathan McNair	0.50
	Russ Law	1.10
Professional Staff	Nelson Allan	1.35
	Tetsu Takagaki	20.20
	Crystal Taylor	0.10
Admin Staff	Josephine Fong	0.40
		53.10

Total fees	$18,788.50
GST	939.43
Total fees and taxes	19,727.93
Out of pocket costs:	
- Website	9.50
GST on out of pocket costs	0.48
	9.98
Total fees, out of pocket costs and taxes	$19,737.91

Crowe

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January 5, 2023 Invoice No. 408291

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
SECOND BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING DECEMBER 31, 2022

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period November 15, 2022 to December 31, 2022 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP, and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
  - court-ordered liquidation;
  - supporting affidavits;
  - appeal matters;
  - listing of creditors;
  - townhouse safety and structural concerns;
  - temporary shoring;
  - critical insurance and related matters;
  - City of Vancouver (the "**COV**") unsafe order;
  - websites for windup;
  - Purchase and Sale Agreement (the "**PSA**");
  - timeline for the completion of the sale;
  - financing-related matters;
  - special levy funds;
  - rental concerns;
  - RDH Building Science Inc ("**RDH**") follow up temporary shoring inspection report;
  - RDH life safety issues with townhouses and recommendations;
  - Alliance EHS Consulting Inc. ("**Alliance**") Hazmat inspection;
  - snowfall concerns;
  - general updates on the wind-up;
  - day-to-day management of the Strata; and,
  - several other matters.
- Reviewing documents in relation to the appeal filed by certain commercial units;
- Publishing updates to website;

- Reviewing documents relating to the condition of the property including, but not limited to, engineering reports from MGH Consulting Inc., Apex Building Sciences Inc., and RDH;
- Attending a meeting with members of the strata council, Dwell and Lawson Lundell LLP;
- Numerous discussions and correspondence with the listing broker, Colliers, with respect to, among other things, particulars of windup, PSA, lack of property insurance, general liability insurance, COV concerns, townhouse structural concerns, and several other matters;
- Numerous discussions and correspondence with CapriCMW with respect to, among other things, follow-up on insurance proposals, temporary shoring on townhouses, condition of the property, reports from engineers, documentation required for insurer, 2022 to 2023 general liability insurance proposal (the "**Insurance Proposal**"), binding of the Insurance Proposal, immediate concerns, and several other matters;
- Numerous discussions and correspondence with RDH with respect to, among other things, temporary shoring, recent temporary shoring follow-up report, immediate concerns, safety issues, work completed to date, outstanding work remaining, immediate recommendations for townhouses, hazmat assessment, snowfall concerns, and several other matters;
- Various discussions and correspondence with the COV with respect to, among other things, property concerns, pending sale of the property, requirements to meet COV demands, requirement for permits, and several other matters;
- Numerous discussions and correspondence with Dwell with respect to, among other things, strata council meetings, listing of creditors, insurance matters, general accounting matters, building condition/safety issues, COV demands, cash position of strata, RDH immediate recommendations for townhouses, hazmat assessment, snowfall concerns, and several other matters;
- Numerous discussions and correspondence with David Kwan of Alliance with respect to, among other things, Hazmat inspection, coordination of access to townhouses and notices to owners, and several other matters;
- Numerous discussions and correspondence with owners with respect to the liquidation, the appointment of the Liquidator, the status of the proceeding, website, pleadings available for download, building-related issues, snowfall concerns, binding of the Insurance Proposal, and several other matters;
- Telephone calls, emails and other correspondence with the owners of the townhouses with respect to the increased safety risks due to heavy snowfall that was raised by RDH; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	30.60
	Jonathan McNair	0.20
	Russ Law	0.30
Professional Staff	Nelson Allan	1.20
	Tetsu Takagaki	32.45
	Susan De Jong	0.10
	Crystal Taylor	0.10
Admin Staff	Josephine Fong	0.30
		65.25

Total fees	$23,520.25
GST	1,176.01
Total fees and taxes	$24,696.26

Outstanding Prior Balance

Invoice 405981	$19,737.91

Crowe

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February 14, 2023 Invoice No. 410861

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
THIRD BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING JANUARY 31, 2023

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period January 1, 2023 to January 31, 2023 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP, and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
  - appeal matters;
  - AGM;
  - 2023 budget;
  - election of strata council;
  - townhouse safety and structural concerns;
  - tower safety and structural concerns;
  - temporary shoring;
  - commercial general liability insurance and related matters;
  - property replacement insurance and related matters;
  - City of Vancouver (the "**COV**") unsafe order;
  - building permit matters;
  - website updates;
  - Purchase and Sale Agreement (the "**PSA**");
  - timeline for the completion of the sale;
  - financing-related matters;
  - use of contingent reserve funds (the "**CRF**")
  - condo fees in arrears;
  - rental concerns;
  - pending COV prosecution hearing;
  - RDH Building Science Inc ("**RDH**") follow up temporary shoring inspection report;
  - RDH life safety issues with tower and assessment;
  - Alliance EHS Consulting Inc. ("**Alliance**") hazmat inspection findings;

  - general updates on the wind-up;
  - day-to-day management of the Strata; and,
  - several other matters.

- Publishing updates to website;
- Attending a meeting with members of the strata council, and Lawson Lundell LLP;
- Numerous discussions and correspondence with the listing broker, Colliers, with respect to, among other things, particulars of windup, PSA, AGM, lack of property insurance, general liability insurance, COV concerns, appeal matters, townhouse structural concerns, and several other matters;
- Numerous discussions and correspondence with CapriCMW with respect to, among other things, marketing efforts, inability to propose building replacement insurance, immediate concerns, and several other matters;
- Numerous discussion and correspondence with HUB Insurance with respect to, among other things, seeking proposal for property replacement insurance, documentation required for insurer, commercial general liability insurance, site visit, immediate concerns, and several other matters;
- Numerous discussions and correspondence with RDH with respect to, among other things, temporary shoring, recent temporary shoring follow-up report, immediate concerns, life safety issues regarding the townhouses and tower, work completed to date, outstanding work remaining, immediate recommendations for townhouses, hazmat assessment, and several other matters;
- Numerous discussions and correspondence with Dwell with respect to, among other things, AGM, 2023 budget, insurance matters, general accounting matters, building condition/safety issues, cash position of strata, use of CRF, RDH immediate recommendations for townhouses and tower, hazmat assessment, and several other matters;
- Numerous discussions and correspondence with Alliance with respect to, among other things, hazmat inspection of townhouses and tower, coordination of access to townhouses and tower, and notices to owners, and several other matters;
- Numerous discussions and correspondence with owners with respect to the liquidation, RDH's assessment of the tower, website, building-related issues, and several other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	10.45
	Jonathan McNair	0.15
Professional Staff	Tetsu Takagaki	21.60
	Crystal Taylor	0.10
	Sharon Xia	0.70
Admin Staff	Josephine Fong	0.30
		33.30

Total fees	$10,837.00
GST	541.85
Total fees and taxes	$11,378.85
Out of Pocket Costs:	
- Advertising costs	759.06
GST	37.95
Total out of pocket costs:	$797.01
Total fees and out of pocket costs	$12,175.86
Outstanding Prior Balance	
Invoice 405981	$19,737.91
Invoice 408291	$24,696.26

Crowe

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April 25, 2023 Invoice No. 417901

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
FOURTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING MARCH 31, 2023

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period February 1, 2023 to March 31, 2023 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
  - appeal matters;
  - annual general meeting ("**AGM**");
  - 2023 budget;
  - election of strata council;
  - townhouse safety and structural concerns;
  - tower safety and structural concerns;
  - temporary shoring;
  - commercial general liability insurance with CapriCMW and related matters;
  - property replacement insurance with HUB International ("**HUB**") and related matters;
  - binding of property replacement insurance with HUB;
  - City of Vancouver (the "**COV**") unsafe order;
  - Affidavit for Court related to COV unsafe order;
  - building permit matters;
  - website updates;
  - Purchase and Sale Agreement with Intracorp. (the "**PSA**");
  - timeline for the completion of the sale;
  - use of contingent reserve funds (the "**CRF**");
  - Strata Property Act ("**SPA**") and the use of CRF;
  - condo fees in arrears;
  - rental concerns;
  - COV prosecution hearing;
  - RDH Building Science Inc ("**RDH**") follow up temporary shoring inspection report;
  - RDH life safety issues with tower and assessment;

  - Steelhead Contracting Ltd. ("**Steelhead**") townhouse shoring and exploratory openings;
  - Alliance EHS Consulting Inc. ("**Alliance**") hazmat inspection findings for townhouses;
  - townhouse mould abatement concerns;
  - Alliance hazmat inspection for the tower;
  - Underused Housing Tax ("**UHT**") matters;
  - snowfall concerns;
  - general updates on the wind-up;
  - day-to-day management of the Strata; and,
  - several other matters.

- Publishing updates to website;
- Attending the AGM with members of the strata council, owners, and Lawson;
- Numerous discussions and correspondence with the listing broker, Colliers, with respect to, among other things, PSA, AGM, appeal matters, and several other matters;
- Numerous discussions and correspondence with HUB with respect to, among other things, proposal for property replacement insurance, documentation required for insurer, commercial general liability insurance, funding of premiums; immediate concerns, binding of replacement cost insurance, and several other matters;
- Numerous discussions and correspondence with RDH with respect to, among other things, temporary shoring, recent temporary shoring follow-up report, immediate concerns, Steelhead proposal, life safety issues regarding the townhouses and tower, mould abatement for townhouses, coordination of access to townhouses, work completed to date, outstanding work remaining, immediate recommendations for townhouses, hazmat assessment, and several other matters;
- Numerous discussions and correspondence with Dwell with respect to, among other things, AGM, 2023 budget, insurance matters, general accounting matters, building condition/safety issues, cash position of strata, SPA and the use of CRF, condo fees in arrears, RDH immediate recommendations for townhouses and tower, coordination of access to tower with Alliance and RDH, UHT matters, hazmat assessment, proceeding with Steelhead proposal, mould abatement proposals, and several other matters;
- Numerous discussions and correspondence with Alliance with respect to, among other things, hazmat inspection of townhouses and tower, coordination of access to tower, mould abatement for townhouses, and notices to owners, and several other matters;
- Numerous discussions and correspondence with Steelhead with respect to, among other things, shoring repair and exploratory openings in townhouses, scope of work and proposal, coordination with RDH and Dwell, hazmat assessment; and several other matters;
- Numerous discussions and correspondence with owners with respect to the liquidation, RDH's assessment of the townhouses and tower, website, building-related issues, binding of the replacement insurance with HUB, COV unsafe order matters, and several other matters; and,

- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	23.00
	Jonathan McNair	0.80
Professional Staff	Tetsu Takagaki	23.35
	Sharon Xia	0.50
	Susan De Jong	0.10
Admin Staff	Josephine Fong	0.20
		47.95

Total fees	$17,527.00
GST	876.35
	$18,403.35
Out of pocket costs:	
Courier	7.50
GST	0.38
	7.88
Total fees, out of pocket costs and taxes	$18,411.23

Outstanding Prior Balance

Invoice 405981	$19,737.91
Invoice 408291	$24,696.26
Invoice 410861	$12,175.86

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May 9, 2023 Invoice No. 421651

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
FIFTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING APRIL 30, 2023

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period April 1, 2023 to April 30, 2023 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
  - townhouse safety and structural concerns;
  - tower safety and structural concerns;
  - temporary shoring;
  - property replacement insurance with HUB International ("**HUB**") and related matters;
  - coordinating access for townhouse and tower units;
  - City of Vancouver (the "**COV**") unsafe order;
  - building permit matters;
  - use of contingent reserve funds (the "**CRF**");
  - COV prosecution hearing;
  - RDH Building Science Inc ("**RDH**") follow up temporary shoring inspection report;
  - Steelhead Contracting Ltd. ("**Steelhead**") townhouse shoring and exploratory openings;
  - Alliance EHS Consulting Inc. ("**Alliance**") hazmat inspection findings for the tower;
  - general updates on the wind-up;
  - day-to-day management of the Strata; and,
  - several other matters.
- Numerous discussions and correspondence with the listing broker, Colliers, with respect to, among other things, legal opinion on price reduction and delayed possession clauses, and several other matters;

- Numerous discussions and correspondence with RDH with respect to, among other things, temporary shoring, immediate concerns, Steelhead site visit, life safety issues regarding the townhouses and tower, coordination of access to townhouses and tower, work completed to date, outstanding work remaining, building permit matters, next steps for COV order, tower hazmat assessment, and several other matters;
- Numerous discussions and correspondence with Dwell with respect to, among other things, insurance matters, general accounting matters, building condition/safety issues, use of CRF, coordination of access to tower and townhouses with Alliance and RDH, tower hazmat assessment, and several other matters;
- Numerous discussions and correspondence with Alliance with respect to, among other things, hazmat inspection tower, coordination of access to the tower, and several other matters;
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	**Name**	**Hours**
Trustee	Derek Lai	4.55
Professional Staff	Tetsu Takagaki	2.85
	Sharon Xia	0.60
Admin Staff	Josephine Fong	0.20
		8.20

Total fees	$3,036.25
GST	151.81
	$3,188.06

Outstanding Prior Balance

Invoice 405981	$19,737.91
Invoice 408291	$24,696.26
Invoice 410861	$12,175.86
Invoice 417901	$18,411.23

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June 14, 2023 Invoice No. 424285

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
SIXTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING MAY 31, 2023

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period May 1, 2023 to May 31, 2023 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
    - townhouse safety and structural concerns;
    - tower safety and structural concerns;
    - temporary shoring;
    - SGM;
    - purchase and sale agreement with Intra
    - property replacement insurance with HUB International ("**HUB**") and related matters;
    - coordinating access for townhouse and tower units;
    - RDH Building Science Inc ("**RDH**") townhouse site visit review report;
    - Steelhead Contracting Ltd. ("**Steelhead**") townhouse shoring and exploratory openings;
    - Alliance EHS's ("**Alliance**") hazmat assessment report on tower and townhouses;
    - mould abatement for townhouses;
    - Genesis Restoration ("**Genesis**") mould abatement quote requirement;
    - tax return for Strata's 2022 fiscal year end;
    - roof anchor inspection;
    - general updates on the wind-up;
    - day-to-day management of the Strata; and,
    - several other matters.
- Numerous discussions and correspondence with the listing broker, Colliers, with respect to, among other things, price adjustment, delayed possession clause, new listing agreement, purchase and sale agreement, and several other matters;

- Numerous discussions and correspondence with RDH with respect to, among other things, temporary shoring, immediate concerns, Steelhead site visit, life safety issues regarding the townhouses and tower, townhouse site visit review report, roof anchor inspection, planned tower site visit, coordination of access to townhouses and tower, work completed to date, outstanding work remaining, Alliance hazmat assessment report, mould abatement for townhouses, Genesis mould abatement quote requirement, and several other matters;
- Numerous discussions and correspondence with Dwell with respect to, among other things, insurance matters, SGM, general accounting matters, building condition/safety issues, Steelhead site visit, RDH Townhouse site visits review report, coordination of access to tower and townhouses with Alliance and RDH, mould abatement for townhouses, Genesis mould abatement quote requirement, roof anchor inspection, RDH's planned tower site visit, and several other matters;
- Numerous discussions and correspondence with owners with respect to the liquidation, RDH's planned tower site visit, Steelhead site visit, roof anchor inspection, RDH's townhouse site visit review report, mould abatement at townhouse, Genesis mould abatement quote requirement, and several other matters;
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	9.05
Professional Staff	Tetsu Takagaki	14.80
	Sharon Xia	0.30
Admin Staff	Josephine Fong	0.20
		24.35

Total fees	$8,226.75
GST	411.34
	$8,638.09

Outstanding Prior Balance

Invoice 405981 (Initial to November 14, 2022)	$19,737.91
Invoice 408291 (November 15, 2022 to December 31, 2022)	$24,696.26
Invoice 421651 (April 1, 2023 to April 30, 2023)	$ 3,188.06
Total outstanding prior balance	$47,622.23

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July 12, 2023 Invoice No. 426987

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
SEVENTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING JUNE 30, 2023

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period June 1, 2023 to June 30, 2023 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
  - townhouse safety and structural concerns;
  - tower safety and structural concerns;
  - temporary shoring;
  - purchase and sale agreement with Intracorp Acquisition Co. Ltd.;
  - purchaser's intention to extend purchaser's second condition;
  - waiver of vendor's third condition;
  - coordinating access for townhouse;
  - RDH Building Science Inc ("**RDH**") townhouse site visit review report;
  - Steelhead Contracting Ltd. ("**Steelhead**") townhouse shoring and exploratory openings;
  - entry denied to townhouse units;
  - inconclusive report on townhouses from RDH;
  - planned return to townhouse units;
  - roof anchor inspection;
  - owner concerns;
  - general updates on the wind-up;
  - day-to-day management of the Strata; and,
  - several other matters.
- Attending a meeting with members of the strata council;
- Numerous discussions and correspondence with the listing broker, Colliers, with respect to, among other things, purchase and sale agreement, waiver of vendor's third condition, purchaser's intention to extend second condition, and several other matters;

- Numerous discussions and correspondence with RDH with respect to, among other things, temporary shoring, immediate concerns, Steelhead site visit, life safety issues regarding the townhouses and tower, townhouse site visit review report, insulation in townhouses, roof anchor inspection, tower site visit, coordination of access to townhouses and tower, work completed to date, outstanding work remaining, entry denied to townhouse units, inconclusive report on townhouses from RDH, planned return to townhouse units, and several other matters;
- Numerous discussions and correspondence with Dwell with respect to, among other things, general accounting matters, building condition/safety issues, Steelhead site visit, RDH Townhouse site visit, coordination of access to townhouses with Alliance and RDH, insulation in townhouse units, inconclusive report on townhouse from RDH, entry denied to townhouse units, planned return to townhouse units, roof anchor inspection, and several other matters;
- Numerous discussions and correspondence with owners with respect to the liquidation, Steelhead site visit, RDH's townhouse site visit, entry denied to townhouse units, inconclusive report on townhouses from RDH, planned return to townhouse units, and several other matters;
- Execution of Notice of Satisfaction of Conditions Precedent of vendor's third condition;
- Various discussions and correspondence with HUB International and Dwell with respect to renewal of insurance, necessity to call a meeting of owners, funding, and other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	**Name**	**Hours**
Trustee	Derek Lai	8.90
Professional Staff	Tetsu Takagaki	9.05
	Josephine Fong	0.70
		18.65

Total fees	$6,706.50
GST	335.33
	$7,041.83

Outstanding Prior Balance

Invoice 405981 (Initial to November 14, 2022)	$19,737.91
Invoice 408291 (November 15, 2022 to December 31, 2022)	$24,696.26
Invoice 421651 (April 1, 2023 to April 30, 2023)	$ 3,188.06
Invoice 424285 (May 1, 2023 to May 31, 2023)	$ 8,638.09
Total outstanding prior balance	$56,260.32

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August 21, 2023 Invoice No. 428970

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
EIGHTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING JULY 31, 2023

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period July 1, 2023 to July 31, 2023 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
  - townhouse safety and structural concerns;
  - temporary shoring;
  - purchase and sale agreement with Intracorp Acquisition Co. Ltd. ("**Intracorp**");
  - extension of purchaser's second condition;
  - non-refundable deposit from Intracorp;
  - coordinating access for townhouse;
  - RDH Building Science Inc ("**RDH**") townhouse site visit;
  - Steelhead Contracting Ltd. ("**Steelhead**") townhouse shoring and exploratory openings;
  - entry denied to townhouse units;
  - inconclusive report on townhouses from RDH;
  - planned return to townhouse units;
  - RDH life safety assessment on tower;
  - Telus on-site event;
  - owner concerns;
  - general updates on the wind-up;
  - day-to-day management of the Strata; and,
  - several other matters.
- Numerous discussions and correspondence with the listing broker, Colliers, with respect to, among other things, purchaser to extend second condition, update from purchaser, and several other matters;
- Numerous discussions and correspondence with RDH with respect to, among other things, temporary shoring, immediate concerns, Steelhead site visit, life safety issues regarding the townhouses and tower, townhouse site visit review report, coordination of access to townhouses, work completed to date, outstanding work remaining, entry

denied to townhouse units, inconclusive report on townhouses from RDH, planned return to townhouse units, and several other matters;

- Numerous discussions and correspondence with Dwell with respect to, among other things, general accounting matters, building condition/safety issues, Steelhead site visit, RDH Townhouse site visit, coordination of access to townhouses with Steelhead and RDH, inconclusive report on townhouse from RDH, entry denied to townhouse units, planned return to townhouse units, and several other matters;
- Numerous discussions and correspondence with owners with respect to the liquidation, update on purchase and sale agreement with Intracorp, RDH's tower assessment, owner concerns, and several other matters;
- Letter to townhouse owners of units 3362 & 3370 with respect to, among other things, urgent need to access townhouses, townhouse safety and structural concerns, entry denied to townhouse units, planned return to townhouse units, life-safety risk for occupants, City of Vancouver prosecution against Joyce Place, jeopardizing sale with Intracorp, and several other matters;
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	**Name**	**Hours**
Trustee	Derek Lai	5.90
Professional Staff	Tetsu Takagaki	7.70
	Sharon Xia	0.40
Administration Staff	Josephine Fong	0.20
		14.20

Total fees	$4,902.50
GST	245.13
	$5,147.63

Outstanding Prior Balance

Invoice 405981 (Initial to November 14, 2022)	$19,737.91
Invoice 408291 (November 15, 2022 to December 31, 2022)	$24,696.26
Invoice 421651 (April 1, 2023 to April 30, 2023)	$ 3,188.06
Invoice 424285 (May 1, 2023 to May 31, 2023)	$ 8,638.09
Invoice 426987 (June 1, 2023 to June 30, 2023)	$ 7,041.83
Total outstanding prior balance	$63,302.15

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September 21, 2023 Invoice No. 430301

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
NINETH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING AUGUST 31, 2023

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period August 1, 2023 to August 31, 2023 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
    - HUB Insurance renewal;
    - townhouse safety and structural concerns;
    - temporary shoring;
    - purchase and sale agreement with Intracorp Acquisition Co. Ltd. ("**Intracorp**");
    - Intracorp's request for subject renewal extension
    - coordinating access for townhouse;
    - RDH Building Science Inc ("**RDH**") townhouse site visit;
    - Steelhead Contracting Ltd. ("**Steelhead**") townhouse shoring and exploratory openings;
    - entry denied to townhouse units;
    - inconclusive report on townhouses from RDH;
    - planned return to townhouse units;
    - RDH life safety assessment on tower;
    - owner concerns;
    - general updates on the wind-up;
    - day-to-day management of the Strata; and,
    - several other matters.
- Numerous discussion and correspondence with HUB Insurance with respect to, among other things, renewal of property insurance, update on status of building conditions, and several other matters;
- Numerous discussions and correspondence with the listing broker, Colliers, with respect to, among other things, Intracorp's request for subject renewal extension, update from purchaser, and several other matters;

- Numerous discussions and correspondence with RDH with respect to, among other things, temporary shoring, immediate concerns, Steelhead site visit, life safety issues regarding the townhouses and tower, townhouse site visit review report, coordination of access to townhouses, work completed to date, outstanding work remaining, entry denied to townhouse units, inconclusive report on townhouses from RDH, planned return to townhouse units, and several other matters;
- Numerous discussions and correspondence with Dwell with respect to, among other things, general accounting matters, HUB insurance renewal, use of special levy funds to fund HUB insurance renewal, building condition/safety issues, Steelhead site visit, RDH Townhouse site visit, coordination of access to townhouses with Steelhead and RDH, inconclusive report on townhouse from RDH, entry denied to townhouse units, planned return to townhouse units, and several other matters;
- Numerous discussions and correspondence with owners with respect to the liquidation, Steelhead site visit, RDH Townhouse site visit, coordination of access to townhouses with Steelhead and RDH, inconclusive report on townhouse from RDH, entry denied to townhouse units, planned return to townhouse units, HUB insurance renewal, Intracorp's request for subject renewal extension, owner concerns, and several other matters;
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	**Name**	**Hours**
Trustee	Derek Lai	8.80
	Jonathan McNair	0.10
Professional Staff	Tetsu Takagaki	5.70
	Sharon Xia	0.40
Administration Staff	Josephine Fong	0.20
		15.20

Total fees	$5,807.50
GST	290.38
	$6,097.88

Outstanding Prior Balance

Invoice 405981 (Initial to November 14, 2022)	$19,737.91
Invoice 408291 (November 15, 2022 to December 31, 2022)	$24,696.26
Invoice 421651 (April 1, 2023 to April 30, 2023)	$ 3,188.06
Invoice 424285 (May 1, 2023 to May 31, 2023)	$ 8,638.09
Invoice 426987 (June 1, 2023 to June 30, 2023)	$ 7,041.83
Invoice 428970 (July 1, 2023 to July 31, 2023)	$ 5,147.63
Total outstanding prior balance	$68,449.78

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October 13, 2023 Invoice No. 431322

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
TENTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING SEPTEMBER 30, 2023

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period September 1, 2023 to September 30, 2023 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
  - HUB Insurance renewal;
  - use of special levy funds for insurance premiums;
  - townhouse safety and structural concerns;
  - amendment to new purchase and sale agreement ("**PSA**") with Intracorp Acquisition Co. Ltd. ("**Intracorp**");
  - Intracorp's request for subject renewal extension;
  - extension fees & costs;
  - review counter offer from Intracorp;
  - inconclusive report on townhouses from RDH;
  - planned return to townhouse units;
  - RDH life safety assessment on tower;
  - owner concerns;
  - pest control;
  - general updates on the wind-up;
  - day-to-day management of the Strata; and,
  - several other matters.
- Attending a meeting with members of the strata council;
- Numerous discussion and correspondence with HUB Insurance with respect to, among other things, underwriting conditions, confirmation of insurance, and several other matters;
- Numerous discussions and correspondence with the listing broker, Colliers, with respect to, among other things, Intracorp's request for subject renewal extension, amendment to PSA, extension fees & costs, review counter offer from Intracorp, and several other matters;

- Numerous discussions and correspondence with RDH Building Science ("**RDH**") with respect to, among other things, temporary shoring, immediate concerns, Steelhead Contracting Ltd. site visit, life safety issues regarding the townhouses and tower, townhouse site visit review report, exploratory openings, work completed to date, outstanding work remaining, inconclusive report on townhouses from RDH, planned return to townhouse units, and several other matters;
- Numerous discussions and correspondence with Dwell with respect to, among other things, general accounting matters, HUB insurance renewal, use of special levy funds to fund HUB insurance renewal, building condition/safety issues, inconclusive report on townhouse from RDH, entry denied to townhouse units, and several other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	**Name**	**Hours**
Trustee	Derek Lai	9.00
Professional Staff	Tetsu Takagaki	5.35
	Sharon Xia	0.30
		14.65

Total fees	$5,720.00
GST	286.00
	$6,006.00

Outstanding Prior Balance

Invoice 405981 (Initial to November 14, 2022)	$19,737.91
Invoice 408291 (November 15, 2022 to December 31, 2022)	$24,696.26
Invoice 421651 (April 1, 2023 to April 30, 2023)	$ 3,188.06
Invoice 424285 (May 1, 2023 to May 31, 2023)	$ 8,638.09
Invoice 426987 (June 1, 2023 to June 30, 2023)	$ 7,041.83
Invoice 428970 (July 1, 2023 to July 31, 2023)	$ 5,147.63
Invoice 430301 (August 1, 2023 to August 31, 2023)	$ 6,097.88
Total outstanding prior balance	$74,547.66

Crowe

Crowe MacKay & Company Ltd.
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November 21, 2023 Invoice No. 433491

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
ELEVENTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING OCTOBER 31, 2023

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period October 1, 2023 to October 31, 2023 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
  - townhouse safety and structural concerns;
  - amendment to new purchase and sale agreement ("**PSA**") with Intracorp Acquisition Co. Ltd. ("**Intracorp**");
  - Intracorp's request for subject renewal extension;
  - extension fees & costs;
  - townhouse third floor deck patch membrane repair;
  - City of Vancouver ("**COV**") inspection of townhouses;
  - RDH Building Science ("**RDH**") life safety assessment on tower;
  - Intracorp's information session for owners;
  - owner concerns and communication regarding life-safety issues;
  - general updates on the wind-up;
  - status update;
  - day-to-day management of the Strata; and,
  - several other matters.
- Attended Intracorp's information session with owners, Colliers International, and Lawson;
- Arranging site visit for COV building inspector for townhouses, scheduled for November 10, 2023;
- Numerous discussion and correspondence with HUB Insurance with respect to, among other things, RDH site visit report, and several other matters;
- Numerous discussions and correspondence with the listing broker, Colliers, with respect to, among other things, renewal extension, amendment to PSA, extension fees & costs, Intracorp's information session for owners, and several other matters;

- Numerous discussions and correspondence with RDH with respect to, among other things, life safety issues, site visit report on townhouses, COV inspection of townhouses, and several other matters;
- Numerous discussions and correspondence with owners with respect to RDH Townhouse site visit, RDH site visit report, life safety issues, and several other matters;
- Numerous discussions and correspondence with Dwell with respect to, among other things, general accounting matters, building condition/safety issues, RDH site visit report on townhouses, COV townhouse inspection, Intracorp's information session for owners; and several other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	**Name**	**Hours**
Trustee	Derek Lai	6.10
Professional Staff	Tetsu Takagaki	10.00
	Sharon Xia	0.40
Administrative Staff	Josephine Fong	0.20
		16.70

Total fees	$6,608.00
GST	330.40
	$6,938.40

Outstanding Prior Balance

Invoice 405981 (Initial to November 14, 2022)	$19,737.91
Invoice 408291 (November 15, 2022 to December 31, 2022)	$24,696.26
Invoice 421651 (April 1, 2023 to April 30, 2023)	$ 3,188.06
Invoice 424285 (May 1, 2023 to May 31, 2023)	$ 8,638.09
Invoice 426987 (June 1, 2023 to June 30, 2023)	$ 7,041.83
Invoice 428970 (July 1, 2023 to July 31, 2023)	$ 5,147.63
Invoice 430301 (August 1, 2023 to August 31, 2023)	$ 6,097.88
Invoice 431322 (September 1, 2023 to September 30,2023)	$ 6,006.00
Total outstanding prior balance	$80,553.66

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December 20, 2023 Invoice No. 435577

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
TWELFTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING NOVEMBER 30, 2023

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period November 1, 2023 to November 30, 2023 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
    - townhouse safety and structural concerns;
    - amendment to new purchase and sale agreement ("**PSA**") with Intracorp Acquisition Co. Ltd. ("**Intracorp**");
    - Intracorp's request for subject removal extension;
    - application for subject removal extension
    - Liquidator's support for subject removal extension;
    - extension fees & costs;
    - townhouse third floor deck patch membrane repair;
    - City of Vancouver ("**COV**") inspection of townhouses;
    - application to extend COV's building permit requirement deadline;
    - Renewal of CapriCMW Insurance Services' ("**CapriCMW**") commercial general liability insurance;
    - Intracorp's information session for owners;
    - owner concerns and communication regarding life-safety issues;
    - general updates on the wind-up;
    - status update;
    - day-to-day management of the Strata; and,
    - several other matters.

- Preparing affidavits in support of the subject removal extension and the COV permit requirement extension;
- Arranging site visit for COV building inspector for townhouses on November 10th, 2023;
- Numerous discussion and correspondence with HUB Insurance with respect to, among other things, fire sprinkler report, and several other matters;
- Numerous discussions and correspondence with the listing broker, Colliers, with respect to, among other things, removal extension, amendment to PSA, extension fees & costs, Intracorp's information session for owners, and several other matters;
- Numerous discussions and correspondence with owners with respect to Intracorp's information meeting, COV's inspection of townhouses, CapriCMW's commercial general liability insurance renewal; life safety issues, and several other matters;
- Numerous discussions and correspondence with CapriCMW with respect to commercial general liability insurance renewal, and several other matters;
- Numerous discussions and correspondence with Dwell with respect to, among other things, general accounting matters, building condition/safety issues, third floor deck patch membrane repair, COV townhouse inspection, CapriCMW commercial general liability insurance renewal; and several other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	**Name**	**Hours**
Trustee	Derek Lai	8.70
	Jonathan McNair	0.40
Professional Staff	Tetsu Takagaki	13.65
	Sarah Sabbagh	0.60
	Sharon Xia	0.50
Administrative Staff	Josephine Fong	0.40
		24.25

Total fees	$9,756.25
GST	487.81
	$10,244.06

Outstanding Prior Balance

Invoice 405981 (Initial to November 14, 2022)	$19,737.91
Invoice 408291 (November 15, 2022 to December 31, 2022)	$24,696.26
Invoice 421651 (April 1, 2023 to April 30, 2023)	$ 3,188.06
Invoice 424285 (May 1, 2023 to May 31, 2023)	$ 8,638.09
Invoice 426987 (June 1, 2023 to June 30, 2023)	$ 7,041.83
Invoice 428970 (July 1, 2023 to July 31, 2023)	$ 5,147.63
Invoice 430301 (August 1, 2023 to August 31, 2023)	$ 6,097.88
Invoice 431322 (September 1, 2023 to September 30, 2023)	$ 6,006.00
Invoice 433491 (October 1, 2023 to October 31, 2023)	$ 6,938.40
Total outstanding prior balance	$87,492.06

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January 19, 2024 Invoice No. 437820

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
THIRTEENTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING DECEMBER 31, 2024

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period December 1, 2023 to December 31 2023 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
    - townhouse safety and structural concerns;
    - rent back concerns;
    - approval of application for subject removal extension;
    - communication to owners regarding rezoning;
    - City of Vancouver ("**COV**") rezoning public hearing;
    - Review policy of CapriCMW Insurance Services' ("**CapriCMW**") commercial general liability insurance;
    - owner concerns and communication regarding life-safety issues;
    - general updates to owners on the wind-up;
    - status update;
    - day-to-day management of the Strata; and,
    - several other matters.
- Renewing CapriCMW's general liability insurance for 2023 - 2024;
- Numerous discussions and correspondence with HUB Insurance with respect to, annual inspection report and rectifying issues, and other matters;
- Numerous discussions and correspondence with the listing broker, Colliers, with respect to, among other things, approval of removal extension, amendment to PSA, extension fees & costs, and several other matters;

- Numerous discussions and correspondence with Intracorp regarding extension being granted, CapriCMW's commercial general liability insurance renewal; life safety issues, and several other matters;
- Numerous discussions and correspondence with CapriCMW with respect to commercial general liability insurance renewal, binding of renewal policy, and several other matters;
- Numerous discussions and correspondence with Dwell with respect to, among other things, general accounting matters, building condition/safety issues, COV townhouse inspection, CapriCMW commercial general liability insurance renewal, and several other matters;
- Numerous discussions and correspondence with Pooni Group with respect to, among other things, approval of extension, COV rezoning public hearing and letter to owners regarding same, translation of letter to owners, and several other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	**Name**	**Hours**
Trustee	Derek Lai	3.80
Professional Staff	Tetsu Takagaki	4.95
	Sharon Xia	0.40
		9.15

Total fees	$3,782.75
GST	189.14
	$3,971.89

Outstanding Prior Balance

Invoice 405981 (Initial to November 14, 2022)	$19,737.91
Invoice 408291 (November 15, 2022 to December 31, 2022)	$24,696.26
Invoice 421651 (April 1, 2023 to April 30, 2023)	$ 3,188.06
Invoice 424285 (May 1, 2023 to May 31, 2023)	$ 8,638.09
Invoice 426987 (June 1, 2023 to June 30, 2023)	$ 7,041.83
Invoice 428970 (July 1, 2023 to July 31, 2023)	$ 5,147.63
Invoice 430301 (August 1, 2023 to August 31, 2023)	$ 6,097.88
Invoice 431322 (September 1, 2023 to September 30, 2023)	$ 6,006.00
Invoice 433491 (October 1, 2023 to October 31, 2023)	$ 6,938.40
Invoice 435577 (November 1, 2023 to November 30, 2023)	$ 10,244.06
Total outstanding prior balance	$97,736.12

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March 11, 2024 Invoice No. 440589

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
FOURTEENTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING JANUARY 31, 2024

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period January 1, 2024 to January 31 2024 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
    - Annual General Meeting;
    - 2024 – 2025 budget;
    - townhouse safety and structural concerns;
    - communication to owners regarding rezoning;
    - instructions to owners to support rezoning public hearing;
    - City of Vancouver ("**COV**") rezoning public hearing;
    - approval of rezoning;
    - No report from COV district building inspector;
    - owner concerns and communication regarding life-safety issues;
    - sprinkler repair;
    - general updates to owners on the wind-up;
    - status update;
    - day-to-day management of the Strata; and,
    - several other matters.
- Attending a information meeting with Pooni Group to provide instruction for owners to show support for the rezoning at public hearing;
- Numerous discussions and correspondence with HUB Insurance with respect to, annual inspection report and rectifying issues, and other matters;

- Numerous discussions and correspondence with the listing broker, Colliers, with respect to, among other things, extension agreement, upcoming COV rezoning public hearing, approval of rezoning, and several other matters;
- Numerous discussions and correspondence with Dwell with respect to, among other things, general accounting matters, agency agreement, building condition/safety issues, COV townhouse inspection, COV rezoning public hearing, approval of rezoning, and several other matters;
- Numerous discussions and correspondence with owners with respect to information meeting with Pooni Group to assist owners with supporting the rezoning at the public hearing, approval of the rezoning application, and several other matters;
- Numerous discussions and correspondence with Pooni Group with respect to, among other things, COV rezoning public hearing and letter to owners regarding same, meeting with owners to provide instruction to support rezoning at public hearing, approval of rezoning, and several other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	**Name**	**Hours**
Trustee	Derek Lai	5.55
Professional Staff	Tetsu Takagaki	14.50
	Sarah Sabbagh	0.60
	Sharon Xia	0.30
Administrative	Josephine Fong	0.20
		21.15

Total fees	$8,002.00
GST	400.10
	$8,402.10

Outstanding Prior Balance

Invoice 405981 (Initial to November 14, 2022)	$19,737.91
Invoice 408291 (November 15, 2022 to December 31, 2022)	$24,696.26
Invoice 421651 (April 1, 2023 to April 30, 2023)	$ 3,188.06
Invoice 424285 (May 1, 2023 to May 31, 2023)	$ 8,638.09
Invoice 426987 (June 1, 2023 to June 30, 2023)	$ 7,041.83
Invoice 428970 (July 1, 2023 to July 31, 2023)	$ 5,147.63
Invoice 430301 (August 1, 2023 to August 31, 2023)	$ 6,097.88
Invoice 431322 (September 1, 2023 to September 30, 2023)	$ 6,006.00
Invoice 433491 (October 1, 2023 to October 31, 2023)	$ 6,938.40
Invoice 435577 (November 1, 2023 to November 30, 2023)	$ 10,244.06
Invoice 437820 (December 1, 2023 to December 31, 2023)	101,708.01
Total outstanding prior balance	$97,736.12

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March 25, 2024 Invoice No. 441585

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
FIFTEENTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING FEBRUARY 29, 2024

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period February 1, 2024 to February 29 2024 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
    - Annual General Meeting ("**AGM**");
    - AGM minutes;
    - 2024 – 2025 budget;
    - property insurance extension with HUB Insurance ("**HUB**");
    - special levy funds available for property insurance extension;
    - no report from COV district building inspector;
    - general updates to owners on the wind-up;
    - status update;
    - day-to-day management of the Strata; and,
    - several other matters.
- Attending AGM and preparations for the same;
- Review AGM minutes;
- Binding of HUB Property Replacement Insurance extension;
- Numerous discussion and correspondence with Strata Council with respect to, extension of HUB property insurance, and other matters;
- Numerous discussions and correspondence with HUB Insurance with respect to, extension of property insurance, possible discount on premiums, and other matters;

- Numerous discussions and correspondence with owners with respect to approval of the rezoning application, no on-site inspection by COV at townhouses, binding of general liability insurance policy, and several other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	**Name**	**Hours**
Trustee	Derek Lai	4.00
Professional Staff	Tetsu Takagaki	7.00
	Sarah Sabbagh	0.20
	Sharon Xia	0.40
		11.60

Total fees	$4,605.00
GST	230.25
	$4,835.25

Outstanding Prior Balance

Invoice 405981 (Initial to November 14, 2022)	$19,737.91
Invoice 408291 (November 15, 2022 to December 31, 2022)	$24,696.26
Invoice 421651 (April 1, 2023 to April 30, 2023)	$ 3,188.06
Invoice 424285 (May 1, 2023 to May 31, 2023)	$ 8,638.09
Invoice 426987 (June 1, 2023 to June 30, 2023)	$ 7,041.83
Invoice 428970 (July 1, 2023 to July 31, 2023)	$ 5,147.63
Invoice 430301 (August 1, 2023 to August 31, 2023)	$ 6,097.88
Invoice 431322 (September 1, 2023 to September 30, 2023)	$ 6,006.00
Invoice 433491 (October 1, 2023 to October 31, 2023)	$ 6,938.40
Invoice 435577 (November 1, 2023 to November 30, 2023)	$ 10,244.06
Invoice 437820 (December 1, 2023 to December 31, 2023)	$101,708.01
Invoice 440589 (January 1, 2024 to January 31, 2024)	$ 8,402.10
Total outstanding prior balance	$106,138.22

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April 11, 2024 Invoice No. 444354

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
SIXTEENTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING MARCH 31, 2024

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period March 1, 2024 to March 31 2024 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
    - property insurance extension with HUB Insurance ("**HUB**");
    - payment of property insurance extension premiums through special levy funds;
    - sprinkler leak at townhouse unit;
    - general updates to owners on the wind-up;
    - status update;
    - day-to-day management of the Strata; and,
    - several other matters.
- Numerous discussion and correspondence with Strata Council with respect to, extension of HUB property insurance, and other matters;
- Numerous discussions and correspondence with HUB Insurance with respect to, binding of extension of property insurance, and other matters;
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	0.85
Professional Staff	Tetsu Takagaki	1.50
	Sharon Xia	0.40
Administrative Staff	Josephine Fong	0.40
		3.15

Total fees	$1,111.00
GST	55.55
	$1,166.55

Outstanding Prior Balance

Invoice 405981 (Initial to November 14, 2022)	$19,737.91
Invoice 408291 (November 15, 2022 to December 31, 2022)	$24,696.26
Invoice 421651 (April 1, 2023 to April 30, 2023)	$ 3,188.06
Invoice 424285 (May 1, 2023 to May 31, 2023)	$ 8,638.09
Invoice 426987 (June 1, 2023 to June 30, 2023)	$ 7,041.83
Invoice 428970 (July 1, 2023 to July 31, 2023)	$ 5,147.63
Invoice 430301 (August 1, 2023 to August 31, 2023)	$ 6,097.88
Invoice 431322 (September 1, 2023 to September 30, 2023)	$ 6,006.00
Invoice 433491 (October 1, 2023 to October 31, 2023)	$ 6,938.40
Invoice 435577 (November 1, 2023 to November 30, 2023)	$10,244.06
Invoice 437820 (December 1, 2023 to December 31, 2023)	$ 3,971.89
Invoice 440589 (January 1, 2024 to January 31, 2024)	$ 8,402.10
Invoice 441585 (February 1, 2024 to February 29, 2024)	$ 4,835.25
Total outstanding prior balance	$114,945.36

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May 14, 2024 Invoice No. 451520

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
SIXTEENTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING APRIL 30, 2024

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period April 1, 2024 to April 30, 2024 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
  - pending subject removal by Intracorp;
  - financial statements of the Strata;
  - general updates to owners on the wind-up;
  - status update;
  - day-to-day management of the Strata; and,
  - several other matters.
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	0.70
Professional Staff	Tetsu Takagaki	1.40
	Sharon Xia	0.40
Administrative Staff	Josephine Fong	0.20
		2.70

Total fees	$960.00
GST	48.00
	$1,008.00

Outstanding Prior Balance

Invoice 405981 (Initial to November 14, 2022)	$19,737.91
Invoice 408291 (November 15, 2022 to December 31, 2022)	$24,696.26
Invoice 421651 (April 1, 2023 to April 30, 2023)	$ 3,188.06
Invoice 424285 (May 1, 2023 to May 31, 2023)	$ 8,638.09
Invoice 426987 (June 1, 2023 to June 30, 2023)	$ 7,041.83
Invoice 428970 (July 1, 2023 to July 31, 2023)	$ 5,147.63
Invoice 430301 (August 1, 2023 to August 31, 2023)	$ 6,097.88
Invoice 431322 (September 1, 2023 to September 30, 2023)	$ 6,006.00
Invoice 433491 (October 1, 2023 to October 31, 2023)	$ 6,938.40
Invoice 435577 (November 1, 2023 to November 30, 2023)	$10,244.06
Invoice 437820 (December 1, 2023 to December 31, 2023)	$ 3,971.89
Invoice 440589 (January 1, 2024 to January 31, 2024)	$ 8,402.10
Invoice 441585 (February 1, 2024 to February 29, 2024)	$ 4,835.25
Invoice 444354 (March 1, 2024 to March 31, 2024)	$ 1,166.55
Total outstanding prior balance	$116,111.91

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June 28, 2024 Invoice No. 454479

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
EIGTHTEEN BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING MAY 31, 2024

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period May 1, 2024 to May 31, 2024 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
    - subject removal by Intracorp;
    - closing action items;
    - information on renters and owners;
    - financial statements of the Strata;
    - general updates to owners on the wind-up;
    - status update;
    - day-to-day management of the Strata; and,
    - several other matters.
- Numerous discussions and correspondence with owners, property manager, and Colliers with respect to Intracorp's subject removal, and several other matters;
- Numerous discussion and correspondence with Intracorp with respect to tenant and owner information, closing action items, subject removal, and several other matters;
- Correspondence with Lawson and counsel for Intracorp with respect to closing matters, information requested, and several other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	5.70
Professional Staff	Tetsu Takagaki	2.70
	Sharon Xia	0.30
Administrative Staff	Josephine Fong	0.20
		8.90

Total fees	$4,111.50
GST	205.58
	$4,317.08

Outstanding Prior Balance

Invoice 405981 (Initial to November 14, 2022)	$19,737.91
Invoice 408291 (November 15, 2022 to December 31, 2022)	$24,696.26
Invoice 421651 (April 1, 2023 to April 30, 2023)	$ 3,188.06
Invoice 424285 (May 1, 2023 to May 31, 2023)	$ 8,638.09
Invoice 426987 (June 1, 2023 to June 30, 2023)	$ 7,041.83
Invoice 428970 (July 1, 2023 to July 31, 2023)	$ 5,147.63
Invoice 430301 (August 1, 2023 to August 31, 2023)	$ 6,097.88
Invoice 431322 (September 1, 2023 to September 30, 2023)	$ 6,006.00
Invoice 433491 (October 1, 2023 to October 31, 2023)	$ 6,938.40
Invoice 435577 (November 1, 2023 to November 30, 2023)	$10,244.06
Invoice 437820 (December 1, 2023 to December 31, 2023)	$ 3,971.89
Invoice 440589 (January 1, 2024 to January 31, 2024)	$ 8,402.10
Invoice 441585 (February 1, 2024 to February 29, 2024)	$ 4,835.25
Invoice 444354 (March 1, 2024 to March 31, 2024)	$ 1,166.55
Invoice 451520 (April 1, 2024 to April 30, 2024)	$ 1,008.00
Total outstanding prior balance	$116,111.91

Crowe MacKay & Company Ltd.
Licensed Insolvency Trustee
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Vancouver, BC V6E 4T5
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Toll Free +1 (844) 887-DEBT (3328)
Fax +1 (604) 687-5617
www.crowemackayco.ca

August 2, 2024 Invoice No. 457540

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
NINETEENTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING JULY 31, 2024

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period June 1, 2024 to July 31, 2024 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
    - subject removal by Intracorp;
    - geotech testing requirement by Intracorp;
    - memo to owners on sale and closing;
    - documents needed for closing;
    - current financial information;
    - general updates to owners on the wind-up;
    - status update;
    - day-to-day management of the Strata; and,
    - several other matters.
- Numerous discussion and correspondence with Intracorp, council, Colliers, Lawson and other parties with respect to tenant and owner information, closing action items, and several other matters;
- Correspondence with Lawson and counsel for Intracorp with respect to closing matters, information requested, residential and commercial tenancies, and several other matters; and,
- Correspondence with Hub Insurance with respect to addition of second payee per request of owner, and several other matters.
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	4.65
Professional Staff	Tetsu Takagaki	3.10
	Sharon Xia	0.30
Administrative Staff	Josephine Fong	0.20
		8.25

Total fees	$3,664.00
GST	183.20
	$3,847.20

Outstanding Prior Balance

Invoice 405981 (Initial to November 14, 2022)	$19,737.91
Invoice 408291 (November 15, 2022 to December 31, 2022)	$24,696.26
Invoice 421651 (April 1, 2023 to April 30, 2023)	$ 3,188.06
Invoice 424285 (May 1, 2023 to May 31, 2023)	$ 8,638.09
Invoice 426987 (June 1, 2023 to June 30, 2023)	$ 7,041.83
Invoice 428970 (July 1, 2023 to July 31, 2023)	$ 5,147.63
Invoice 430301 (August 1, 2023 to August 31, 2023)	$ 6,097.88
Invoice 431322 (September 1, 2023 to September 30, 2023)	$ 6,006.00
Invoice 433491 (October 1, 2023 to October 31, 2023)	$ 6,938.40
Invoice 435577 (November 1, 2023 to November 30, 2023)	$10,244.06
Invoice 437820 (December 1, 2023 to December 31, 2023)	$ 3,971.89
Invoice 440589 (January 1, 2024 to January 31, 2024)	$ 8,402.10
Invoice 441585 (February 1, 2024 to February 29, 2024)	$ 4,835.25
Invoice 444354 (March 1, 2024 to March 31, 2024)	$ 1,166.55
Invoice 451520 (April 1, 2024 to April 30, 2024)	$ 1,008.00
Invoice 454479 (May 1, 2024 to May 31, 2024)	$ 4,317.08
Total outstanding prior balance	$121,436.99

Crowe

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November 27, 2024 Invoice No. 463684

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
TWENTIETH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING AUGUST 31, 2024

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period August 1, 2024 to August 31, 2024 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
  - Unit and common area inspection by Intracorp;
  - closing items and preparation of the same;
  - arbitration of Purchase Price Adjustment ("**PPA**");
  - Comparable assessment value by realtor, Colliers International ("**Colliers**");
  - deposit and balance of funds;
  - tenancy agreements;
  - fire alarms and fire panel related matters;
  - urgent requirement for fire inspection prior to closing;
  - fibre optic upgrade to connect fire pannel to emergency service;
  - holdback for repairs during delayed possession period;
  - Intracorp's position on breach of contract;
  - arranging termination of service contracts upon closing;
  - special levy funds to be held in trust;
  - general updates to owners on the wind-up;
  - status update;
  - day-to-day management of the Strata; and,
  - several other matters.
- Attending a meeting with the Strata Council, Lawson, and Dwell with respect to closing action items, fire panel deficiencies, fire monitoring connecting to emergency services, PPA, negotiations with Intracorp, Intracorp's site visit and requirement to access units, and several other matters;
- Attending meetings with Lawson, and Colliers with respect to PPA, post-closing repairs, Intracorp's position, existing holdback, reserve for repairs, alleged breaches of the purchase sales agreement, arbitration of PPA, and several other matters;

- Phone calls to owners to coordinate site visit of suites by Intracorp;
- Update to owners regarding update on closing, Hub Insurance renewal, and Intracorp's site visit;
- Numerous discussion and correspondence with Community Fire Prevention Ltd. with respect to 2023 inspection, deficiencies outstanding, 2024 inspection, and several other matters;
- Numerous discussion and correspondence with Intracorp, council, Colliers, Lawson and other parties with respect to tenant and owner information, closing action items, and several other matters;
- Correspondence with Lawson and counsel for Intracorp with respect to closing matters, information requested, residential and commercial tenancies, and several other matters; and,
- Correspondence with Hub Insurance with respect to addition of second payee per request of owner, and several other matters.
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	27.40
Professional Staff	Tetsu Takagaki	21.30
	Aneeya Johal	8.50
	Sarah Rourke	3.75
	Sharon Xia	0.30
		61.25

Total fees	$23,770.50
GST	1,188.53
	$24,959.03

Outstanding Prior Balance

Invoice 405981 (Initial to November 14, 2022)	$19,737.91
Invoice 408291 (November 15, 2022 to December 31, 2022)	$24,696.26
Invoice 421651 (April 1, 2023 to April 30, 2023)	$ 3,188.06
Invoice 424285 (May 1, 2023 to May 31, 2023)	$ 8,638.09
Invoice 426987 (June 1, 2023 to June 30, 2023)	$ 7,041.83
Invoice 428970 (July 1, 2023 to July 31, 2023)	$ 5,147.63
Invoice 430301 (August 1, 2023 to August 31, 2023)	$ 6,097.88
Invoice 431322 (September 1, 2023 to September 30, 2023)	$ 6,006.00
Invoice 433491 (October 1, 2023 to October 31, 2023)	$ 6,938.40
Invoice 435577 (November 1, 2023 to November 30, 2023)	$10,244.06
Invoice 437820 (December 1, 2023 to December 31, 2023)	$ 3,971.89
Invoice 440589 (January 1, 2024 to January 31, 2024)	$ 8,402.10
Invoice 441585 (February 1, 2024 to February 29, 2024)	$ 4,835.25
Invoice 444354 (March 1, 2024 to March 31, 2024)	$ 1,166.55

Invoice 451520 (April 1, 2024 to April 30, 2024)	$ 1,008.00
Invoice 454479 (May 1, 2024 to May 31, 2024)	$ 4,317.08
Invoice 457540 (June 1, 2024 to July 31, 2024)	$ 3,847.20
Total outstanding prior balance	$125,284.19

GST #103436325RT0001

Please make cheque payable to Crowe MacKay & Company Ltd. Payment due upon receipt of invoice.
Service charge of 1.5% per month (19.56% per annum) will be charged on overdue accounts.

Crowe

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November 27, 2024 Invoice No. 463685

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
TWENTY-FIRST BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING OCTOBER 31, 2024

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the periods September 1, 2024 to October 31, 2024 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), and/or the property management company, Dwell Property Management ("**Dwell**"), with respect to the following:
    - Unit and common area inspection by Intracorp;
    - closing items and preparation of the same;
    - contacting townhouse owners as a courtesy for Intracorp;
    - Legal action from Intracorp for alleged breaches in contract;
    - Telus fibre optic upgrade for fire panel;
    - fire alarms and fire panel related matters;
    - urgent requirement for fire inspection prior to closing;
    - addressing fire panel issues prior to closing;
    - connecting fire panel to emergency service;
    - cancellation of service contracts prior to closing;
    - cancellation of insurance coverage at closing;
    - final payments to vendors prior to closing;
    - delivery of keys to new property manager;
    - inspection of townhouses;
    - holdback for repairs during delayed possession period;
    - special levy funds to be held in trust;
    - general updates to owners on the wind-up;
    - status update;
    - day-to-day management of the Strata; and,
    - several other matters.
- Coordinating urgent fire inspection of the property with Community Fire Prevention Ltd. ("**Community Fire**") and owners;
- Coordinating installation of Telus fibre optics;

- Coordinating connection of fire panel to emergency services with Safeco Systems Ltd. ("**Safeco**");
- Contacting townhouse owners regarding Intracorp's offer to move into the tower;
- Attending a meeting with the, Lawson, and RDH Building Science ("**RDH**") with respect to townhouse inspection, deficiencies, previous reports, follow up site visit, and several other matters;
- Numerous discussion and correspondence with Community Fire with respect to 2023 inspection, deficiencies outstanding, 2024 inspection, passing of inspection of fire panel, and several other matters;
- Numerous discussion and correspondence with Safeco with respect to establishing connecting between fire panel and emergency services; urgent service requirement, and several other matters;
- Numerous discussion and correspondence with Intracorp, council, Colliers, Lawson and other parties with respect to closing action items, and several other matters;
- Correspondence with Lawson and counsel for Intracorp with respect to closing matters, information requested, residential and commercial tenancies, and several other matters;
- Correspondence with HUB Insurance with respect to lapsing of insurance coverage on the date of closing, and several other matters;
- Correspondence with Acera Insurance with respect to termination of commercial genera liability coverage as of the date of closing, and several other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	**Name**	**Hours**
Trustee	Derek Lai	33.90
	Jonathan McNair	1.05
Professional Staff	Tetsu Takagaki	36.45
	Sharon Xia	0.20
		71.60

Total fees	$31,238.25
GST	1,561.91
Total	$32,800.16
Out of pocket costs:	
Courier	$33.04
GST	1.65
Total	$34.69
Total	$32,834.85

Crowe

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January 14, 2025 Invoice No. 467235

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
TWENTY-SECOND BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING NOVEMBER 30, 2024

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period November 1, 2024 to November 30, 2024 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**") with respect to the following:
  - Legal action from Intracorp for alleged breaches in contract;
  - Liquidator's response to claim;
  - Counter claim against Intracorp;
  - Safeco Systems Ltd.'s ("**Safeco**") previous work on connecting fire panel monitoring;
  - previous reports provided by RDH on the Property;
  - status of fire panel at time of close;
  - assessed value bonus;
  - status update; and,
  - several other matters.
- Numerous discussion and correspondence with Community Fire with respect to results of 2024 inspection, passing of inspection of fire panel, and several other matters;
- Numerous discussion and correspondence with Safeco with respect to work done to establish connecting between fire panel and emergency services, payment for monitoring equipment, and several other matters;
- Discussions with RDH with respect to preparing a report on the condition of the townhouses; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	5.10
Professional Staff	Tetsu Takagaki	7.60
		12.70

Total fees	$5,655.00
GST	282.75
Total	$5,937.75

Outstanding Prior Balance

Invoice 463684 (August 1, 2024 to August 31, 2024)	$ 24,959.03
Invoice 463685 (September 1, 2024 to October 31, 2024)	$ 32,834.85
Total outstanding prior balance	$ 57,793.88

Crowe

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January 21, 2025 Invoice No. 467473

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
TWENTY-THIRD BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING DECEMBER 31, 2024

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period December 1, 2024 to December 31, 2024 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**") with respect to the following:
  - Legal action from Intracorp for alleged breaches in contract;
  - Liquidator's response to claim;
  - counter claim against Intracorp;
  - Safeco Systems Ltd.'s ("**Safeco**") installed equipment;
  - RDH Building Science ("**RDH**") site visit at the Townhouses;
  - RDH report on status of the Townhouses;
  - refund of insurance premiums from Acera Insurance;
  - City of Vancouver utility calculation;
  - assessed value bonus;
  - status update; and,
  - several other matters.
- Numerous discussion and correspondence with RDH with respect to, among other things, Townhouse visit, report on status of the Townhouses, and several other matters;
- Numerous discussion and correspondence with Safeco with respect to, amongst other things, installed equipment for fire panel, and several other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	2.20
Professional Staff	Tetsu Takagaki	4.45
		6.65

Total fees	$2,878.75
GST	143.94
Total	$3,022.69

Outstanding Prior Balance

Invoice 463684 (August 1, 2024 to August 31, 2024)	$ 24,959.03
Invoice 463685 (September 1, 2024 to October 31, 2024)	$ 32,834.85
Invoice 467235 (December 1, 2024 to December 31, 2024)	$ 5,937.75
Total outstanding prior balance	$ 63,731.63

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March 4, 2025 Invoice No. 469466

To the Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
TWENTY-FOURTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING JANUARY 31, 2025

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period January 1, 2025 to January 31, 2025 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata, the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**") with respect to the following:
  - legal action from Intracorp for alleged breaches in contract;
  - Liquidator's response to claim;
  - counter claim against Intracorp;
  - RDH Building Science ("**RDH**") report on status of the townhouses;
  - fire alarm matter in claim;
  - City of Vancouver prosecution matter in claim;
  - purchase price adjustment;
  - preparation for trial;
  - engagement of professionals to support legal action;
  - assessed value bonus;
  - status update; and,
  - several other matters.
- Preparation of affidavit;
- Preparation of a letter to former owners with respect to , among other things, update on litigation, alleged breaches in contract and position of the Liquidator, purchase price Adjustment, professionals retained to support legal action, and several other matters;
- Numerous discussions and correspondence with RDH with respect to, among other things, report on status of the townhouses, and several other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	4.00
Professional Staff	Tetsu Takagaki	4.35
Administrative Staff	Josephine Fong	0.40
		8.75

Total fees	$3,903.25
GST	195.16
Total	$4,098.41

GST #103436325RT0001

Please make cheque payable to Crowe MacKay & Company Ltd. Payment due upon receipt of invoice.
Service charge of 1.5% per month (19.56% per annum) will be charged on overdue accounts.

Crowe

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April 4, 2025 Invoice No. 472967

To the Former Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
TWENTY-FIFTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING FEBRUARY 28, 2025

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Former Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period February 1, 2025 to February 28, 2025 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata and the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), with respect to the following:
  - legal action with Intracorp for alleged breaches in contract;
  - Liquidator's response to claim;
  - affidavit to support Liquidator's response to claim;
  - counter claim against Intracorp;
  - RDH Building Science ("**RDH**") statement of account;
  - return of unused insurance premiums;
  - affidavit to support Liquidator's response to claim;
  - status update; and,
  - several other matters.
- Preparing and swearing of affidavit;
- Preparing a letter to former owners with respect to, among other things, update on litigation, steps being taken, and several other matters;
- Numerous discussions and correspondence with RDH with respect to, among other things, statement of accounts, response to claim, and several other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	1.40
Professional Staff	Tetsu Takagaki	2.70
		4.10

Total fees	$1,782.50
GST	89.13
Total	$1,871.63

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May 7, 2025 Invoice No. 480723

To the Former Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
TWENTY-SIXTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING MARCH 31, 2025

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Former Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period March 1, 2025 to March 31, 2025 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata and the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), with respect to the following:
  - legal action with Intracorp for alleged breaches in contract;
  - Liquidator's response to claim;
  - counter claim against Intracorp for Purchase Price Adjustment (the "**PPA**");
  - consulting services related to counter claim;
  - Notice of Application ("**NOA**") to dismiss Intracorp's claim;
  - RDH Building Science ("**RDH**") statement of account;
  - hearing adjournment;
  - status update; and,
  - several other matters.
- Preparing a letter to former owners with respect to, among other things, update on litigation, NOA to dismiss Intracorp's claim, steps being taken, and several other matters;
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	2.10
Professional Staff	Tetsu Takagaki	5.80
Administrative Staff	Vivian Chen	0.40
		8.30

Total fees	$3,390.00
GST	169.50
Total	$3,559.50

GST #103436325RT0001
Please make cheque payable to Crowe MacKay & Company Ltd. Payment due upon receipt of invoice.
Service charge of 1.5% per month (19.56% per annum) will be charged on overdue accounts.

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May 7, 2025 Invoice No. 480754

To the Former Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
TWENTY-SEVENTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING APRIL 30, 2025

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Former Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period April 1, 2025 to April 30, 2025 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata and the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), with respect to the following:
  - status update on legal action with Intracorp for alleged breaches in contract;
  - Status update on counter claim against Intracorp for Purchase Price Adjustment (the "**PPA**");
  - schedule hearing for legal proceedings;
  - settlement offer from Intracorp;
  - coordinating meeting with former Strata Council to discuss next steps in regards to legal proceedings;
  - status update; and,
  - several other matters.
- Attending a meeting with the former Strata Council, and Lawson, to discuss, among other things, status update on legal proceedings, steps being taken, hearing being scheduled, and several other matters;
- Preparing a letter to former Owners with respect to, among other things, update on litigation, NOA to dismiss Intracorp's claim, steps being taken, hearing being scheduled; and several other matters;
- Review list of documentation to be included in legal proceedings;
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	3.70
Professional Staff	Tetsu Takagaki	3.35
Administrative Staff	Vivian Chen	0.50
		7.55

Total fees	$3,366.25
GST	168.31
Total	$3,534.56

GST #103436325RT0001

Please make cheque payable to Crowe MacKay & Company Ltd. Payment due upon receipt of invoice.
Service charge of 1.5% per month (19.56% per annum) will be charged on overdue accounts.

Crowe

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June 3, 2025, Invoice No. 489165

To the Former Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
TWENTY-EIGHTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING MAY 31, 2025

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Former Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period May 1, 2025 to May 31,2025 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata and the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), with respect to the following:
  - status update on legal action with Intracorp for alleged breaches in contract;
  - Status update on counter claim against Intracorp for Purchase Price Adjustment (the "**PPA**");
  - difficulty in securing a hearing date;
  - formal offer to settle to Intracorp;
  - status update; and,
  - several other matters.
- Preparing a letter to former Owners with respect to, among other things, update on litigation, status of the counterclaim regarding the PPA, difficulty in securing a hearing date, formal offer for settlement to Intracorp, and several other matters;
- Various correspondence with owners regarding the status of proceedings, difficulty in securing a hearing date, separate proceedings for dismissal, PPA and, several other matters;
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	1.60
Professional Staff	Tetsu Takagaki	3.25
Professional Staff	Ian Spoor	2.25
Administrative Staff	Vivian Chen	0.70
		7.80

Total fees	$2,552.50
GST	127.63
Total	$2,680.13

GST #103436325RT0001

Please make cheque payable to Crowe MacKay & Company Ltd. Payment due upon receipt of invoice.
Service charge of 1.5% per month (19.56% per annum) will be charged on overdue accounts.

Crowe

Crowe MacKay & Company Ltd.
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Main (604) 689 3928
Toll Free 1 (844) 887 DEBT (3328)
Fax (604) 687 5617
www.crowemackayco.ca

August 1, 2025, Invoice No. 489325

To the Former Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
TWENTY-NINTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING JUNE 30, 2025

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Former Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period June 1, 2025 to June 31, 2025 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata and the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), with respect to the following:
  - status update on legal action with Intracorp for alleged breaches in contract;
  - Status update on counter claim against Intracorp for Purchase Price Adjustment (the "**PPA**");
  - response to Intracorp's amended counter claim;
  - discovery of Intracorp;
  - application to dismiss Intracorp's counter claim;
  - application response from Intracorp;
  - trial scheduling for the dismissal of Intracorp's counter claim;
  - consultant to assist with application;
  - status update; and,
  - several other matters.
- Review of Intracrop's response to application to dismiss Intracorp's counter claim;
- Preparation of data room to share documents;
- Various correspondence with owners regarding the status of proceedings, securing a hearing date, PPA and, several other matters;
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	3.50
Professional Staff	Tetsu Takagaki	3.15
Professional Staff	Ian Spoor	1.00
Administrative Staff	Vivian Chen	0.30
		7.95

Total fees	$3,306.25
GST	165.31
Total	$3,471.56

GST #103436325RT0001

Please make cheque payable to Crowe MacKay & Company Ltd. Payment due upon receipt of invoice.
Service charge of 1.5% per month (19.56% per annum) will be charged on overdue accounts.

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September 15, 2025, Invoice No. 491707

To the Former Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
THIRTIETH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING JULY 31, 2025

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Former Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period July 1, 2025 to July 31, 2025 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata and the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), with respect to the following:
  - status update on legal action with Intracorp for alleged breaches in contract;
  - Status update on counter claim against Intracorp for Purchase Price Adjustment (the "**PPA**");
  - examination discovery of Intracorp;
  - examination discovery of Liquidator;
  - hearing scheduling for the dismissal of Intracorp's claim;
  - affidavit filed by Intracorp;
  - review draft affidavit of Tetsu Takagaki;
  - renewal of Joyce Place website domain;
  - preparation of update to owners;
  - status update; and,
  - several other matters.
- Various correspondence with owners regarding the status of proceedings, securing a hearing date, PPA and, several other matters;
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	2.60
Professional Staff	Tetsu Takagaki	5.75
Professional Staff	Ian Spoor	0.50
Administrative Staff	Vivian Chen	0.70
		9.55

Total fees	$3,768.75
GST	188.44
Total	$3,957.19

Outstanding Prior Balance

Invoice 469466 (January 2025)	4,098.41
Invoice 472967 (February 2025)	1,871.63
Invoice 480723 (March 2025)	3,559.50
Invoice 480754 (April 2025)	3,534.56
Invoice 489165 (May 2025)	2,680.13
Invoice 489325 (June 2025)	3,471.56
Total outstanding prior balance	$19,215.79

Crowe

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www.crowemackayco.ca

October 6, 2025 Invoice No. 492548

To the Former Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
THIRTY-FIRST BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING AUGUST 31, 2025

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Former Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period August 1, 2025 to August 31, 2025 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata and the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), with respect to the following:
  - status update on legal action with Intracorp for alleged breaches in contract;
  - Status update on counter claim against Intracorp for Purchase Price Adjustment (the "**PPA**");
  - examination discovery of Intracorp;
  - examination discovery of Liquidator;
  - document request from Intracorp;
  - renewal of Joyce Place website domain;
  - preparation of update to owners;
  - elevator issues and safety concerns;
  - website renewal;
  - status update; and,
  - several other matters.
- Preparation and issuance of a formal update to owners regarding the status of proceedings, PPA and several other matters;
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	2.50
Professional Staff	Tetsu Takagaki	2.10
Professional Staff	Ian Spoor	0.50
Administrative Staff	Vivian Chen	0.40
		5.50

Total fees	$2,300.00
GST	115.00
Total	$2,415.00

Outstanding Prior Balance

Invoice 469466 (January 2025)	$4,098.41
Invoice 472967 (February 2025)	1,871.63
Invoice 480723 (March 2025)	3,559.50
Invoice 480754 (April 2025)	3,534.56
Invoice 489165 (May 2025)	2,680.13
Invoice 489325 (June 2025)	3,471.56
Invoice 491707 (July 2025)	3,957.19
Total outstanding prior balance	$23,172.98

Crowe MacKay & Company Ltd.
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Main (604) 689 3928
Toll Free 1 (844) 887 DEBT (3328)
Fax (604) 687 5617
www.crowemackayco.ca

October 7, 2025 Invoice No. 492639

To the Former Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
THIRTY-SECOND BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING SEPTEMBER 30, 2025

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Former Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period September 1, 2025 to September 30, 2025 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata and the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), with respect to the following:
  - status update on legal action with Intracorp for alleged breaches in contract;
  - status update on counter claim against Intracorp for Purchase Price Adjustment (the "**PPA**");
  - examination for discovery;
  - documents to review and prepare for examination;
  - preliminary estimate of costs;
  - potential settlement with Intracorp;
  - potential counter offer to Intracorp;
  - calculation of PPA;
  - amended notice of civil claim;
  - timing of hearing;
  - reasons for adjournment;
  - BC Assessment values;
  - litigation with Intracorp;
  - discrepancies in 2021 roll values;
  - status update; and,
  - several other matters.
- Preparing for and attending examination for discovery; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	25.80
	Nelson Allan	0.70
Professional Staff	Tetsu Takagaki	6.45
	Ian Spoor	0.50
Administrative Staff	Vivian Chen	0.30
		33.75

Total fees	$17,011.25
GST	850.56
Total	$17,861.81

Outstanding Prior Balance

Invoice 469466 (January 2025)	$4,098.41
Invoice 472967 (February 2025)	1,871.63
Invoice 480723 (March 2025)	3,559.50
Invoice 480754 (April 2025)	3,534.56
Invoice 489165 (May 2025)	2,680.13
Invoice 489325 (June 2025)	3,471.56
Invoice 491707 (July 2025)	3,957.19
Invoice 492548 (August 2025)	2,415.00
Total outstanding prior balance	$25,587.98

Crowe MacKay & Company Ltd.
Licensed Insolvency Trustee
Main (604) 689 3928
Toll Free 1 (844) 887 DEBT (3328)
Fax (604) 687 5617
www.crowemackayco.ca

December 11, 2025 Invoice No. 496972

To the Former Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
THIRTY-THIRD BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING NOVEMBER 30, 2025

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Former Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period October 1, 2025 to November 30, 2025 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata and the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), with respect to the following:
  - status update on legal action with Intracorp for alleged breaches in contract;
  - status update on counter claim against Intracorp for Purchase Price Adjustment (the "**PPA**");
  - Bonus Density;
  - potential settlement with Intracorp;
  - calculation of PPA;
  - notice of application;
  - hearing date;
  - funds held in trust;
  - status update; and,
  - several other matters.
- Preparing letters to owners providing, amongst other things, an update on the litigation with Intracorp;
- Attending four conference calls with the Strata Council to discuss, amongst other things, PPA matters, settlement with Intracorp, notice of application, hearing date, and several other matters;
- Numerous emails and correspondence with Strata Council with respect to, PPA Matters, interim billing, and several other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	10.00
Professional Staff	Tetsu Takagaki	2.25
	Ian Spoor	1.05
Administrative Staff	Vivian Chen	0.40
		13.70

Total fees	$6,718.50
GST	335.93
Total	$7,054.43

Outstanding Prior Balance

Invoice 469466 (January 2025)	$4,098.41
Invoice 472967 (February 2025)	1,871.63
Invoice 480723 (March 2025)	3,559.50
Invoice 480754 (April 2025)	3,534.56
Invoice 489165 (May 2025)	2,680.13
Invoice 489325 (June 2025)	3,471.56
Invoice 491707 (July 2025)	3,957.19
Invoice 492548 (August 2025)	2,415.00
Invoice 492639 (September 2025)	17,861.81
Total outstanding prior balance	$43,449.79

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Main (604) 689 3928
Toll Free 1 (844) 887 DEBT (3328)
Fax (604) 687 5617
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January 22, 2026 Invoice No. 500270

To the Former Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
THIRTY-FOURTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING DECEMBER 31, 2025

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Former Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period December 1, 2025 to December 31, 2025 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata and the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), with respect to the following:
  - status update on legal action with Intracorp for alleged breaches in contract;
  - status update on counter claim against Intracorp for Purchase Price Adjustment (the "**PPA**");
  - density bonus;
  - potential settlement with Intracorp;
  - Special General Meeting ("**SGM**");
  - information session prior to SGM;
  - calculation of PPA;
  - funds held in trust;
  - status update; and,
  - several other matters.
- Attending a video conference calls with the Strata Council to discuss, amongst other things, PPA matters, settlement with Intracorp, density bonus, SGM, information session, and several other matters;
- Numerous emails and correspondence with Strata Council with respect to, PPA Matters, settlement with Intracorp, interim billing, SGM, information session and several other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	4.95
Professional Staff	Tetsu Takagaki	2.90
	Ian Spoor	0.60
Administrative Staff	Vivian Chen	0.30
		8.75

Total fees	$4,349.50
GST	217.48
Total	$4,566.98

Outstanding Prior Balance

Invoice 469466 (January 2025)	$4,098.41
Invoice 472967 (February 2025)	1,871.63
Invoice 480723 (March 2025)	3,559.50
Invoice 480754 (April 2025)	3,534.56
Invoice 489165 (May 2025)	2,680.13
Invoice 489325 (June 2025)	3,471.56
Invoice 491707 (July 2025)	3,957.19
Invoice 492548 (August 2025)	2,415.00
Invoice 492639 (September 2025)	17,861.81
Invoice 496972 (October – November 2025)	7,054.43
Total outstanding prior balance	$50,504.22

Crowe

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Licensed Insolvency Trustee
Main (604) 689 3928
Toll Free 1 (844) 887 DEBT (3328)
Fax (604) 687 5617
www.crowemackayco.ca

February 13, 2026 Invoice No. 501640

To the Former Owners of Joyce Place, Strata Plan LMS 992
3362-3376, 3378, 3380, 3382 & 3384 Vanness Avenue
Vancouver, BC

RE: COURT ORDERED LIQUIDATION OF THE OWNERS, STRATA PLAN LMS 992
THIRTY-FIFTH BILLING OF THE LIQUIDATOR
FOR THE PERIOD CONCLUDING JANUARY 31, 2026

Billing on account for professional services rendered with respect to the court-ordered liquidation of The Former Owners, Strata Plan LMS 992 (the "**Strata**"). The services rendered during the period January 1, 2026 to January 31, 2026 included, *inter alia*, the following major activities:

- Numerous discussions and correspondence with the Strata and the Liquidator's legal counsel, Lawson Lundell LLP ("**Lawson**"), with respect to the following:
  - approval of settlement agreement with Intracorp by owners;
  - mutual release;
  - holdback, discharge, and taxation;
  - density bonus matters;
  - Information Meeting for Owners;
  - Special General Meeting ("**SGM**");
  - owner package ahead of SGM
  - minutes of SGM;
  - notice to owners;
  - frequently asked questions ("**FAQ**") ahead of SGM;
  - current status of property;
  - allocation of settlement;
  - reconciliation of trust funds;
  - owner's inquiries; and,
  - several other matters.
- Attending the SGM;
- Attending the Information Meeting;
- Reviewing and revising various documents including interim billing, mutual release and settlement agreement with Intracorp, SGM minutes, FAQ and supporting schedules, reconciliation of trust funds, property photographs, and several other documents;
- Numerous emails and correspondence with Strata Council with respect to SGM minutes, approval of settlement agreement with Intracorp, density bonus, additional distribution and allocation, remaining funds, FAQ, and several other matters;

- Numerous emails and correspondence with owners, with respect to, among other things, general inquiries related to the SGM, information meeting, and several other matters; and,
- Matters of both a general and specific nature not referred to above.

ACCOUNT SUMMARY

Category	Name	Hours
Trustee	Derek Lai	12.40
Professional Staff	Tetsu Takagaki	9.25
Administrative Staff	Vivian Chen	0.30
		21.95

Total fees	$11,419.25
GST	570.96
Total	$11,990.21

Outstanding Prior Balance

Invoice 469466 (January 2025)	$4,098.41
Invoice 472967 (February 2025)	1,871.63
Invoice 480723 (March 2025)	3,559.50
Invoice 480754 (April 2025)	3,534.56
Invoice 489165 (May 2025)	2,680.13
Invoice 489325 (June 2025)	3,471.56
Invoice 491707 (July 2025)	3,957.19
Invoice 492548 (August 2025)	2,415.00
Invoice 492639 (September 2025)	17,861.81
Invoice 496972 (October – November 2025)	7,054.43
Invoice 496972 (December 2025)	4,566.98
Total outstanding prior balance	$55,071.20

From: Tetsu Takagaki <Tetsu.Takagaki@crowemackay.ca>
Sent: Tuesday, February 17, 2026 4:39 PM
To: Derek Lai; Herak21@hotmail.com; seandimitrie@gmail.com; simondavison@gmail.com; pearlkaocheung@icloud.com; fionachan3380@gmail.com; ferdz777@gmail.com; Brian Yan Muk
Cc: Peter Roberts (3158) - 14Flr
Subject: Strata Windup Joyce Place - Liquidator's 35th Billings for the month of January 31, 2026 and LL's Billings to January 31, 2026
Attachments: Joyce Place (LMS992) - 35th Billing - January 31, 2026.pdf; 2026-02-13 LT client enc invoice 1382482.PDF

This message originated from outside our firm.

Hello All,

To keep you apprised of the costs of administration as it relates to the subsequent litigation with Intracorp/Liquidator's discharge, attached is the Liquidator's 35th billings for professional services rendered for the period of January 1, 2026 to January 31, 2026.

We have also provided an unredacted invoice from Lawson Lundell with time details for the periods ending January 31, 2026. Please note that providing these invoices are not a waiver of the Liquidator's privilege over discussions with its counsel (Lawson Lundell). The detailed accounts are only provided to allow the owners to assess the reasonableness of the accounts

If you have any questions, do not hesitate to contact us.

Best Regards,

Tetsu Takagaki, CPA, LIT, CIRP
Licensed Insolvency Trustee
Senior Manager

Crowe

Crowe MacKay & Company Ltd.

1400 – 1185 West Georgia Street
Vancouver, British Columbia V6E 4E6

Direct (604) 697 5298
Main (604) 689 3928
Fax (604) 687 5617
Toll Free 1 (844) 522 7693

This is Exhibit " P " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026.

A Commissioner for taking Affidavits for British Columbia.

Tetsu.Takagaki@crowemackay.ca
https://crowemackayco.ca/
LinkedIn
Twitter
Facebook

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 11/21/22
Invoice No. 1207278
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including October 31, 2022, as per attached detail.

Total Professional Fees	$	14,170.50
Total Taxable Disbursements and Other Charges	$	152.57
Total Exempt Disbursements and Other Charges	$	16.19
Total PST BC	$	991.94
Total GST	$	716.15
Current Invoice Due:	**$**	**16,047.35**

This is our account.

Lawson Lundell LLP

Per: _____
PETER ROBERTS

This is Exhibit " Q " referred to in the affidavit of Derek Lai sworn before me at Vancouver, British Columbia, this 23rd day of April, 2026.

_____
A Commissioner for taking Affidavits for British Columbia.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 11/21/22
Invoice No. 1207278
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including October 31, 2022, as follows:

Date	Timekeeper	Narrative	Hours	Amount
04/28/22	PJR	Telephone call to S. Hamilton on hearing outcome; reporting email to D. Lai	0.10	65.00
10/18/22	PJR	Email from and to court registry on judgment; reporting email to client ; emails with T. Takagaki on disclosure to lenders	0.20	130.00
10/19/22	PJR	Review decision of Justice Marzari; reporting email to D. Lai on decision and next steps; emails with S. Hamilton	1.70	1,105.00
10/20/22	PJR	Call with S. Hamilton, D. Lai and Ed Wilson; review Joyce Place PSA; call to D. Clements on COV charges; call to J. Kinghorn on same; email to D. Clements on adjournment; emails with S. Hamilton's office on documents and information; emails to D. Lai on same	1.60	1,040.00
10/20/22	ELW	Conference call; review Court Order and Contract of Purchase and Sale;	1.50	1,035.00
10/21/22	JMS	Email requesting mortgage documents; receive and review owner contact info and title searches;	0.50	147.50
10/24/22	JMS	Review titles and strata plan; prepare data spreadsheet;	1.50	442.50
10/24/22	ELW	Review and respond to email; review materials; review Purchase and Sale Agreement;	1.50	1,035.00
10/25/22	PJR	Call with Derek Lai and call to Leo Chan on Joyce Place insurance; review email and material from I. Chan on insurance; call to D. Lai on same; emails with S. Hamilton on appeal; email to D. Clements on COV prosecution (0.8)	0.50	325.00

The contents of this invoice may be subject to solicitor-client privilege. Disclosure of a privileged document to a third party could constitute a waiver of privilege. We recommend that prior to voluntarily sharing the contents of this invoice or providing a copy of it to a tax auditor or other person, that you seek legal advice.

Date	Timekeeper	Narrative	Hours	Amount
10/25/22	OY	Receive instructions from Peter Roberts regarding website update and provincial court issue; Correspondence with D. Lai;	0.40	148.00
10/25/22	JMS	Updated data spreadsheet; receive and review financial charges; email to V. Hsu regarding Titles; discussions regarding title searches and financial charges;	1.20	354.00
10/25/22	PJR	Calls and emails with D. Lai and Leo Chen on Joyce Place insurance; instructions to Ozge Yazar review draft form of wind-up; call to S. Hamilton on same; return call to H. Buck	0.70	455.00
10/25/22	ELW	Review and respond to email; review documents;	1.50	1,035.00
10/26/22	PJR	Call from S. Hamilton on draft order and stay application	0.20	130.00
10/26/22	PJR	Call from C. Armstrong on appeal and stay of wind-up order	0.20	130.00
10/26/22	PJR	Review and revise Hamilton's form of wind-up order; email to S. Hamilton on same; email from and to C. Armstrong on stay of proceedings; return call from D. Lai on stay and ongoing management; email from and call to S. Hamilton on draft order	1.40	910.00
10/26/22	ELW	Review and respond to email; conference with D. Lai; review Contract of Purchase and Sale;	1.60	1,104.00
10/27/22	PJR	Calls with Derek Lai to discuss insurance issues and call with Leo Chen; call from Hart Buck on closing extension and prospect of appeal and stay	0.50	325.00
10/27/22	ELW	Review and respond to email; conference with D. Lai; review Contract of Purchase and Sale;	0.50	345.00
10/28/22	PJR	Emails with D. Lai on Joyce Place E&O coverage	0.30	195.00
10/28/22	JMS	Review financial charges; update data spreadsheet;	0.70	206.50
10/28/22	PJR	Zoom call with strata council, D. Lai and Ed Wilson on wind-up issues, pending appeal, insurance, COV prosecution and next steps	0.70	455.00
10/28/22	ELW	Revise Contract of Purchase and Sale - Intracorp; conference call with Strata Council;	1.50	1,035.00

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Date	Timekeeper	Narrative	Hours	Amount
10/31/22	OY	Read and consider the decision of Justice Marzari; Draft and arrange to publish notice of appointment of liquidator in BC gazette and local newspaper; Draft text for Joyce Place website; Send the same to client for review; Review correspondence regarding documents related to health and safety from RDH Building Science;	4.40	1,628.00
10/31/22	PJR	Email from and to D. Lai on COV prosecution and next step on townhouse repairs; Review and revise web page text; discussion with Ozge Yazar on same	0.40	260.00
10/31/22	PJR	Review and revise draft for of order; email from and to S. Hamilton and others on same	0.20	130.00
Total			25.50	14,170.50

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	8.10	690.00	5,589.00
JILLIAN SYCH	JMS	3.90	295.00	1,150.50
OZGE YAZAR	OY	4.80	370.00	1,776.00
PETER ROBERTS	PJR	8.70	650.00	5,655.00
				$14,170.50

Taxable Other Charges

Photocopies	150.90

Non-Taxable Disbursements

LTSA Services (GST exempt)	16.19

Taxable Disbursements

LTSA Service Charge	1.67

Total Fees	**$**	**14,170.50**
Disbursements and Other Charges	**$**	**168.76**
Total PST BC	**$**	**991.94**
Total GST	**$**	**716.15**
CURRENT INVOICE DUE:	**$**	**16,047.35**

Outstanding Prior Balance

Invoice No.	741318	03/30/22	$	636.72

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Invoice No.	744089	04/28/22	$	4,286.91

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 11/21/22
Invoice No. 1207278
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through October 31, 2022

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1207278

Total Professional Fees		14,170.50
Total Taxable Disbursements and Other Charges		152.57
Total Exempt Disbursements and Other Charges		16.19
Total BCPST		991.94
Total GST		716.15
Total Amount Due:	**$**	**16,047.35**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:

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

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

REMITTANCE

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 12/09/22
Invoice No. 1209133
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including November 30, 2022, as per attached detail.

Total Professional Fees	$	18,817.00
Total Taxable Disbursements and Other Charges	$	74.05
Total Exempt Disbursements and Other Charges	$	131.33
Total PST BC	$	1,317.19
Total GST	$	944.55
Current Invoice Due:	**$**	**21,284.12**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 12/09/22
Invoice No. 1209133
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including November 30, 2022, as follows:

Date	Timekeeper	Narrative	Hours	Amount
11/01/22	OY	Start reviewing building safety related documents; Review email correspondence;	0.30	111.00
11/01/22	PJR	Review and comment upon revised order terms from R. Mittal	0.10	65.00
11/02/22	OY	Start reviewing documents related to structural safety of Joyce Place; Review correspondence re notices to owners and website text; Revise Joyce Place website text; Correspondence with Hamilton and Co re missing pleadings; Review charge and particulars re criminal prosecution for failure to comply with unsafe orders;	4.20	1,554.00
11/02/22	PJR	Review and revise draft letter to owners form D. Lai; Review and revise website comments; emails from and to D. Lai on same	0.10	65.00
11/03/22	OY	Prepare for and attend court hearing in Robson square provincial court re breach of order for permit; Report to client re the same; Correspondence re website text; Correspondence with Hamilton and Co re pleadings; Revise website text with additional pleadings;	2.60	962.00
11/03/22	JMS	Obtain copies of financial charges for SL 42, 46 and 58;	0.40	118.00
11/03/22	ELW	Review and respond to email; revise Purchase and Sale Agreement;	0.50	345.00
11/04/22	PJR	Ms Teams call with S. Hamilton, J. Cytrynbaum and J. Carter on PSA deadlines;, Review emails from D. Lai; telephone call from D. Lai; email from and to C. Armstrong on appeal and stay	0.60	390.00

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Date	Timekeeper	Narrative	Hours	Amount
11/04/22	PJR	Review emails with A. Regan and D. Lai on strata liens; telephone call to D. Lai on same; instructions to Ozge Yazar on lien assessment	0.20	130.00
11/08/22	ELW	Review Contract of Purchase and Sale with respect to timeline; conference with Peter Roberts regarding appeal;	1.00	690.00
11/09/22	OY	Follow up with Kevin Bhang re Joyce place website;	0.10	37.00
11/09/22	PJR	Email from Scott Stephens on appeal and stay; reporting email to D. Lai on same ; Review notice of appeal; emails with D. Lai on stay issues and likely evidence	0.40	260.00
11/10/22	OY	Correspondence regarding Joyce place website;	0.30	111.00
11/15/22	PJR	Emails with S. Hamilton and S. Stephens on from of order and stay application	0.20	130.00
11/15/22	PJR	Call from D. Lai on issue with the City permitting and legal department	0.20	130.00
11/15/22	ELW	Review and respond to email regarding timeline;	0.20	138.00
11/16/22	PJR	Call to D. Clements on COV charges; emails with Paul Good; discussion with D. Lai on COV prosecution; email to Mike Cowan, COV inspector	1.30	845.00
11/16/22	OY	Start drafting memorandum about the provincial court proceeding;	0.70	259.00
11/17/22	OY	Legal research regarding the criminal proceedings against the strata for non-compliance with the unsafe order;	4.00	1,480.00
11/18/22	PJR	Email form and telephone call to D. Lai on COV inspector D. Cowan refusal to speak; email to D. Clements at COV on same	0.20	130.00
11/19/22	OY	Review offence act;	0.70	259.00
11/21/22	OY	Finalize the memorandum regarding provincial court matter;	3.10	1,147.00
11/22/22	OY	Correspondence re provincial court hearing;	0.60	222.00
11/22/22	PJR	Emails with D. Clements on call with COV inspector; reporting email to D. Lai on same	0.10	65.00

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Date	Timekeeper	Narrative	Hours	Amount
11/22/22	PJR	Review and comment on memo setting out COV prosecution and recommendations; instructions to Ozge Yazar	0.40	260.00
11/22/22	ELW	Review timelines and key dates chart; review Contract of Purchase and Sale and Amendment; review and respond to email;	0.60	414.00
11/23/22	OY	Conference with city prosecutor D. Clemens;	0.50	185.00
11/23/22	PJR	Return call to D. Lai on insurance, rentals; COV issues, strata meeting and Intracorp deadlines	0.20	130.00
11/24/22	OY	Attend provincial court chambers for city of Vancouver ticket matter;	1.40	518.00
11/25/22	PJR	Call and emails with D. Lai on discuss with COV inspector; Call with D. Lai, T. Takagaki and Ed Wilson on same and call with council; emails with S. Stephens on CA stay application; instructions to Flora Wu on same	0.60	390.00
11/26/22	PJR	Review appellants' stay argument on appeal; email to D. Lai on same	0.40	260.00
11/27/22	FHW	Review and consider appellants' argument in application to stay wind-up order;	0.50	175.00
11/28/22	FHW	Review file pleadings and correspondence relevant to commercial owners' stay application; Conference with Peter Roberts regarding drafting response to same;	3.00	1,050.00
11/28/22	PJR	Discussion with and instructions to Flora Wu on liquidator response to stay application	0.10	65.00
11/29/22	OY	Draft notice to creditor; Correspondence with client;	0.50	185.00
11/29/22	FHW	Prepare, outline and begin drafting client's argument to stay application;	4.20	1,470.00
11/29/22	PJR	Call with Derek Lai on stay application; discussion with Ed Wilson; emails with other respondents' counsel on appeal issues; draft D. Lai appeal affidavit; telephone call to and emails with D. Lai on evidence and appeal position	1.30	845.00

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Date	Timekeeper	Narrative	Hours	Amount
11/30/22	FHW	Further draft and revise liquidator's written argument opposing appellants' stay application; Determine relevant case law authority supporting same;	8.00	2,800.00
11/30/22	OY	Correspondence re creditor notices;	0.10	37.00
11/30/22	PJR	Review emails and attachments from D. Lai on stay affidavit; email to H. Buck on same; draft Affidavit #1 of D. Lai.	0.60	390.00
Total			44.50	18,817.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	2.30	690.00	1,587.00
FLORA WU	FHW	15.70	350.00	5,495.00
JILLIAN SYCH	JMS	0.40	295.00	118.00
OZGE YAZAR	OY	19.10	370.00	7,067.00
PETER ROBERTS	PJR	7.00	650.00	4,550.00
				$18,817.00

Taxable Other Charges

Photocopies	61.80

Non-Taxable Disbursements

LTSA Services (GST exempt)	48.57
Expense Report	82.76

Taxable Disbursements

BC Online	5.50
BC Online Service Charge	1.50
LTSA Service Charge	5.25

Total Fees	**$**	**18,817.00**
Disbursements and Other Charges	**$**	**205.38**
Total PST BC	**$**	**1,317.19**
Total GST	**$**	**944.55**
CURRENT INVOICE DUE:	**$**	**21,284.12**

Outstanding Prior Balance

Invoice No. 741318 03/30/22 $ 636.72

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Invoice No.	744089	04/28/22	$	4,286.91
Invoice No.	1207278	11/21/22	$	16,047.35

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 12/09/22
Invoice No. 1209133
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through November 30, 2022

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1209133

Total Professional Fees		18,817.00
Total Taxable Disbursements and Other Charges		74.05
Total Exempt Disbursements and Other Charges		131.33
Total BCPST		1,317.19
Total GST		944.55
Total Amount Due:	**$**	**21,284.12**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:

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

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

REMITTANCE

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 01/26/23
Invoice No. 1215269
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including December 31, 2022, as per attached detail.

Total Professional Fees	$	25,984.00
Total Taxable Disbursements and Other Charges	$	1,564.96
Total Exempt Disbursements and Other Charges	$	128.40
Total PST BC	$	1,818.88
Total GST	$	1,377.45
Current Invoice Due:	**$**	**30,873.69**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 01/26/23
Invoice No. 1215269
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including December 31, 2022, as follows:

Date	Timekeeper	Narrative	Hours	Amount
11/04/22	ELW	Prepare timeline with respect to Contract of Purchase and Sale and Key Dates;	1.00	690.00
11/09/22	ELW	Review AGM Notice and other issues;	0.50	345.00
11/10/22	ELW	Review documentation and timeline; review and respond to email with D. Lai;	0.50	345.00
11/14/22	ELW	Review Critical Dates Chart;	0.50	345.00
11/25/22	ELW	Review and revise Third Amendment to Purchase and Sale Agreement; review and respond to email; conference call with Strata Council;	2.00	1,380.00
11/29/22	ELW	Review and respond to email regarding Modification Agreement;	0.50	345.00
12/01/22	OY	Creditor notices;	0.40	148.00
12/01/22	PJR	Emails with Hart Buck on extension and market evidence for stay application; Review draft report of H. Buck; emails with H. Buck on same ; call with J. Cytrynbaum, J. Carter and S. Hamilton on stay application; telephone call to S. Stephens seeking resolution of stay issues; email to counsel on same.; reporting email to D. Lai; Review and revise draft response to stay application; emails and instructions to Flora Wu on same	1.20	780.00
12/02/22	OY	Revise creditor notices and make arrangements for sending;	1.60	592.00
12/02/22	FHW	Review edits to respondent's written argument; Revise footnotes in same;	0.60	210.00

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Date	Timekeeper	Narrative	Hours	Amount
12/02/22	PJR	Review materials and draft Affidavit #1 o D Lai; emails with D. Lai on same (appeal)	2.50	1,625.00
12/05/22	FHW	Revise affidavit of D. Lai in support of response book opposing stay of execution; Emails to and from client and Peter Roberts regarding same; Revise liquidator's written argument; Begin preparing Response Book for filing;	4.90	1,715.00
12/05/22	PJR	Emails with Derek Lai on CA affidavit; revise Lai #1 affidavit; instructions to Flora Wu; call with Paul Good of RDH; call with Derek Lai on call with RDH and tower issues	0.50	325.00
12/05/22	OY	Conference with Flora Wu re Lai affidavit;	0.40	148.00
12/05/22	ELW	Process deposit; meeting regarding issues;	0.50	345.00
12/06/22	ELW	Review and respond to email with D. Lai regarding communication with Owners;	0.30	207.00
12/06/22	PJR	Review and comment on D. Lai draft owner update	0.10	65.00
12/06/22	FHW	Emails to and from D Lai regarding affidavit exhibits; Revise written argument; Consider comments regarding Liquidator's written response from counsel for the Owners and counsel for Intracorp; Revise written response in light of same comments;	2.80	980.00
12/07/22	FHW	Finalize written argument; Compile evidence for response book and hearing;	4.50	1,575.00
12/07/22	PJR	Emails with J. Cytrynbaum on stay response argument; Review and revise argument and instructions to Flora Wu	0.20	130.00
12/07/22	PJR	Emails with D. Lai and revisions to draft update letter to owners	0.10	65.00
12/07/22	OY	Review correspondence from D. Lai; Update Joyce Place website regarding update from the liquidator;	1.00	370.00
12/08/22	OY	Arrange to update Joyce Place website;	0.70	259.00
12/08/22	FHW	Finalize revised response book; Correspondence with Court of Appeal Registry regarding filing of same; Prepare book of authorities for hearing;	3.50	1,225.00

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Date	Timekeeper	Narrative	Hours	Amount
12/08/22	PJR	Emails from and telephone call to C. Armstrong on accommodations and Reply stay book; Email Liquidator's Reply Book to all parties	0.40	260.00
12/09/22	FHW	Review and consider appellants' argument and authorities; Prepare case summaries of same authorities and consider grounds for distinction;	4.30	1,505.00
12/09/22	PJR	Review Intracorp reply Book; reporting email to D. Lai on same	0.10	65.00
12/09/22	ELW	Draft Summary of Contract;	0.90	621.00
12/10/22	PJR	Review materials and prepare for stay application	1.50	975.00
12/11/22	FHW	Consider grounds for distinguishing appellants' cases cited in their stay application; Summarize same in preparation for hearing;	3.80	1,330.00
12/11/22	ELW	Review and respond to email regarding repairs recommended by RDH;	0.20	138.00
12/12/22	FHW	Prepare for and attend Court of Appeal Chambers regarding appellants' stay of execution application; Draft memo to file regarding hearing;	4.00	1,400.00
12/12/22	PJR	Prepare for and attend Appellants' stay application before Justice Voith	3.50	2,275.00
12/12/22	ELW	Review and respond to email D. Lai;	0.20	138.00
12/13/22	FHW	Attend court for delivery of judgment; Email to Peter Roberts regarding drafting order; Consider terms of same; Draft Order of a Single Justice;	2.00	700.00
12/13/22	PJR	Reporting emails to S. Hamilton and D. Lai on stay dismissal by Justice Voith	0.10	65.00
12/14/22	FHW	Consider and revise terms of draft order;	0.90	315.00
12/14/22	PJR	Emails from and to T. Takagaki on signing authority for RDH proposal	0.20	130.00
12/14/22	PJR	Review and revise form of CA order; instructions to Flora Wu	0.10	65.00
12/15/22	PJR	Email from and to C. Armstrong on terms of order and need for s.282 SPA vote	0.10	65.00

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Date	Timekeeper	Narrative	Hours	Amount
12/16/22	FHW	Teleconference with C Armstrong (counsel for appellants) to discuss appeal procedure timeline;	0.20	70.00
12/16/22	PJR	Emails with counsel on appeal dates	0.10	65.00
12/19/22	PJR	Email from and to C. Armstrong on s.282 SPA vote on Intracorp PSA	0.30	195.00
12/19/22	PJR	Review emails from S. Hamilton and J. Carter on revised form of order; consider same; email to S. Hamilton	0.20	130.00
12/20/22	PJR	Emails with V. Hsu on endorsed court order emails form Crowe McKay on insurance and snow fall risk identified by RDH; telephone call to T. Takagaki on same	0.30	195.00
12/20/22	ELW	Review and respond to email regarding insurance;	0.20	138.00
12/21/22	FHW	Review and consider appeal record for completeness; Review file and bring forward procedural deadlines;	0.50	175.00
12/21/22	PJR	Emails with T. Takagaki on Joyce place insurance issues	0.10	65.00
12/21/22	ELW	Review and respond to email regarding insurance; review insurance policy;	0.70	483.00
12/22/22	ELW	Review and respond to email with Liquidator, etc.;	0.30	207.00
Total			56.00	25,984.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	8.30	690.00	5,727.00
FLORA WU	FHW	32.00	350.00	11,200.00
OZGE YAZAR	OY	4.10	370.00	1,517.00
PETER ROBERTS	PJR	11.60	650.00	7,540.00
				$25,984.00

Taxable Other Charges

Photocopies	1,444.20
Colour Photocopies	2.00
Trust Administration Fee	15.00

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Non-Taxable Disbursements

Client Disbursement (GST exempt) Wix.com Website Hosting (Joyce Place Strata) - KYB m/c Nov	128.40

Taxable Disbursements

Cash Disbursements - TD VISA - Publication of notice in BC Gazette / OY/PDL	82.76
BC Online	16.50
BC Online Service Charge	4.50

Total Fees	**$**	**25,984.00**
Disbursements and Other Charges	**$**	**1,693.36**
Total PST BC	**$**	**1,818.88**
Total GST	**$**	**1,377.45**
CURRENT INVOICE DUE:	**$**	**30,873.69**

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 01/26/23
Invoice No. 1215269
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through December 31, 2022

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1215269

Total Professional Fees		25,984.00
Total Taxable Disbursements and Other Charges		1,564.96
Total Exempt Disbursements and Other Charges		128.40
Total BCPST		1,818.88
Total GST		1,377.45
Total Amount Due:	**$**	**30,873.69**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:

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

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

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Vancouver, BC
Canada V6C 3L2

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 01/31/23
Invoice No. 1215390
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including January 31, 2023, as per attached detail.

Total Professional Fees	$	3,023.50
Total Taxable Disbursements and Other Charges	$	59.40
Total PST BC	$	211.65
Total GST	$	154.15
Current Invoice Due:	**$**	**3,448.69**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 01/31/23
Invoice No. 1215390
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including January 31, 2023, as follows:

Date	Timekeeper	Narrative	Hours	Amount
01/06/23	PJR	Emails wit6h S. Stephens on costs waiver; call with D. Lai and T. Takagaki on cost waiver and RDH inspections and estimates	0.30	208.50
01/08/23	PJR	Review Draft email to Joyce Place council on RDH report for tower investigations; emails with T. Takagaki on same	0.10	69.50
01/09/23	PJR	Review emails form T. Takagaki and B. Muk; telephone call from D. Lai on various issues; instructions to Ozge Yazar on COV prosecution	0.20	139.00
01/09/23	ELW	Review and respond to email with D. Lai;	0.30	214.50
01/09/23	OY	Correspondence regarding City of Vancouver prosecution;	0.40	172.00
01/10/23	ELW	Review and respond to email regarding AGM and AGM Notice; review and respond to email with J. Darling;	0.40	286.00
01/10/23	OY	Call to D. Clemens; Revise website text;	1.70	731.00
01/11/23	OY	Call with D. Lai re city of Vancouver prosecution; Prepare for hearing;	0.30	129.00
01/11/23	ELW	Review and respond to email;	0.30	214.50
01/12/23	ELW	Review and respond to email regarding strata rental restrictions;	0.30	214.50
01/12/23	OY	Attend provincial court chambers regarding City of Vancouver prosecution matter;	1.40	602.00
01/13/23	OY	Email to client regarding website revisions;	0.10	43.00
Total			5.80	3,023.50

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Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	1.30	715.00	929.50
OZGE YAZAR	OY	3.90	430.00	1,677.00
PETER ROBERTS	PJR	0.60	695.00	417.00
				$3,023.50

Taxable Other Charges

Photocopies	59.40

Total Fees	**$**	**3,023.50**
Disbursements and Other Charges	**$**	**59.40**
Total PST BC	**$**	**211.65**
Total GST	**$**	**154.15**
CURRENT INVOICE DUE:	**$**	**3,448.69**

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LAWSON LUNDELL LLP

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925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 01/31/23
Invoice No. 1215390
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through January 31, 2023

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1215390

Total Professional Fees		3,023.50
Total Taxable Disbursements and Other Charges		59.40
Total BCPST		211.65
Total GST		154.15
Total Amount Due:	**$**	**3,448.69**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:

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

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 02/27/23
Invoice No. 1218728
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including January 31, 2023, as per attached detail.

Total Professional Fees	$	3,763.50
Total PST BC	$	263.45
Total GST	$	188.18
Current Invoice Due:	**$**	**4,215.12**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 02/27/23
Invoice No. 1218728
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including January 31, 2023, as follows:

Date	Timekeeper	Narrative	Hours	Amount
01/11/23	PJR	Call with Derek Lai on COV prosecution and disposition	0.10	69.50
01/18/23	PJR	Emails with T. Takgaki; Review draft AGM notice	0.10	69.50
01/18/23	ELW	Review AGM notices; review issue regarding CRF and resolution arguments; review and respond to e-mail with Liquidator;	0.50	357.50
01/20/23	PJR	meeting with D. Lai, T. Tagaki and strata council members for update	0.70	486.50
01/23/23	PJR	Review email and RDH Hazmat assessment from T. Takagaki	0.10	69.50
01/24/23	ELW	Review and respond to e-mail from liquidator regarding project status; Review AGM agenda; Review and respond to e-mail;	3.00	2,145.00
01/30/23	PJR	Emails with J. Cytranbaum on settlement with commercial owners; emails with D. Lai on same	0.20	139.00
01/31/23	PJR	Call with Ed Wilson to discuss next steps and call with Intracorp and realtors	0.10	69.50
01/31/23	ELW	Conference call regarding strategy; review and respond to e-mail with S. Hamilton;	0.50	357.50
Total			5.30	3,763.50

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	4.00	715.00	2,860.00
PETER ROBERTS	PJR	1.30	695.00	903.50
				$3,763.50

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Total Fees	**$**	**3,763.50**
Total PST BC	**$**	**263.45**
Total GST	**$**	**188.18**
CURRENT INVOICE DUE:	**$**	**4,215.12**

The contents of this invoice may be subject to solicitor-client privilege. Disclosure of a privileged document to a third party could constitute a waiver of privilege. We recommend that prior to voluntarily sharing the contents of this invoice or providing a copy of it to a tax auditor or other person, that you seek legal advice.

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VANCOUVER, BC
V6E 4T5

Invoice Date: 02/27/23
Invoice No. 1218728
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through January 31, 2023

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1218728

Total Professional Fees		3,763.50
Total BCPST		263.45
Total GST		188.18
Total Amount Due:	**$**	**4,215.12**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:

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925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 03/30/23
Invoice No. 1222771
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including February 28, 2023, as per attached detail.

Total Professional Fees	$	7,479.00
Total Taxable Disbursements and Other Charges	$	5.70
Total PST BC	$	523.54
Total GST	$	374.24
Current Invoice Due:	**$**	**8,382.47**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 03/30/23
Invoice No. 1222771
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including February 28, 2023, as follows:

Date	Timekeeper	Narrative	Hours	Amount
02/05/23	PJR	Review email and draft owner reporting letter from T. Takagaki on hazmat issues; revise same; email to T. Takagaki	0.30	208.50
02/06/23	OY	Arrangements to update Joyce Place website;	0.40	172.00
02/08/23	OY	Email to Kevin Bahng regarding Joyce Place website;	0.10	43.00
02/09/23	OY	Correspondence regarding Joyce Place website;	0.10	43.00
02/11/23	PJR	Emails with J. Cytrynbaum on commercial lot settlement and COV prosecution	0.10	69.50
02/13/23	OY	Review email from Peter Roberts;	0.10	43.00
02/13/23	ELW	Review and respond to e-mail regarding AGM;	0.30	214.50
02/15/23	PJR	Review email from T. Takagaki on payment agreements with Units 802, 3386 and 3366; email to T. Takagaki on same and next steps on enforcement	0.30	208.50
02/16/23	PJR	Emails with D. Lai on COV prosecution and draft affidavit; instructions to Ozge Yazar on COV prosecution and Payment Agreements ; consider insurance obligations under Strata Property Act; discussion with Ed Wilson on same and instructions to Emily Raymond	0.60	417.00
02/16/23	ELW	Attend AGM; prepare for AGM; conference with D. Lai; telephone call to Intracorp's lawyer;	2.00	1,430.00
02/17/23	PJR	Call with D. Lai on Joyce Place AGM and insurance coverage issues	0.20	139.00
02/18/23	OY	Draft affidavit of D. Lai for provincial court action;	0.90	387.00

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Date	Timekeeper	Narrative	Hours	Amount
02/21/23	EJR1	Update current jurisprudence regarding liquidator personal liability;	3.50	962.50
02/21/23	PJR	Discussion with and instructions to Emily Raymond on legal research over SPA insurance requirements and liquidator liability	0.10	69.50
02/21/23	PJR	Review research from Emily Raymond; further research on liquidator personal liability; draft reporting email to D. Lai on same	1.70	1,181.50
02/21/23	ELW	Review schedule of critical dates;	0.40	286.00
02/22/23	PJR	Email from V. Hsu; email to D. Lai on entered order; update Joyce Place website	0.10	69.50
02/22/23	PJR	Review and revise draft affidavit on COV prosecution; Review file notes; email to D. Lai on same	1.10	764.50
02/23/23	ELW	Review insurance issue and requirement under Strata Property Act;	0.30	214.50
02/27/23	PJR	Review email and affidavit revisions from D. Lai; revise affidavit; instructions on exhibits ;	0.50	347.50
02/28/23	PJR	Instructions to Kate Coady on payment agreements; revise D. Lai affidavit and email to D. Lai on same	0.30	208.50
Total			13.40	7,479.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	3.00	715.00	2,145.00
EMILY RAYMOND	EJR1	3.50	275.00	962.50
OZGE YAZAR	OY	1.60	430.00	688.00
PETER ROBERTS	PJR	5.30	695.00	3,683.50
				$7,479.00

Taxable Other Charges

Photocopies	5.70

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Total Fees	**$**	**7,479.00**
Disbursements and Other Charges	**$**	**5.70**
Total PST BC	**$**	**523.54**
Total GST	**$**	**374.24**
CURRENT INVOICE DUE:	**$**	**8,382.47**

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LAWSON LUNDELL LLP

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925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 03/30/23
Invoice No. 1222771
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through February 28, 2023

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1222771

Total Professional Fees		7,479.00
Total Taxable Disbursements and Other Charges		5.70
Total BCPST		523.54
Total GST		374.24
Total Amount Due:	**$**	**8,382.47**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

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e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
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Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 04/28/23
Invoice No. 1228047
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including March 31, 2023, as per attached detail.

Total Professional Fees	$	8,065.00
Total Taxable Disbursements and Other Charges	$	192.30
Total PST BC	$	564.56
Total GST	$	412.87
Current Invoice Due:	**$**	**9,234.72**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 04/28/23
Invoice No. 1228047
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including March 31, 2023, as follows:

Date	Timekeeper	Narrative	Hours	Amount
03/01/23	PJR	Review and revise affidavit of D. Lai ; calls with D. Lai on same; call to and emails with J. Carter on Intracorp status	1.50	1,042.50
03/01/23	ELW	Review and respond to e-mail regarding insurance coverage;	0.30	214.50
03/02/23	PJR	Emails and calls with D. Lai on insurance issue and COV affidavit; draft email to D. Lai on purchase of insurance	1.60	1,112.00
03/03/23	KIC	Revise letters to owners of units 3366, 3368 and 802 regarding payments agreements; review ledgers showing unpaid strata fees and arrears;	3.60	1,368.00
03/03/23	PJR	Review and comment on D. Lai insurance email to strata council	0.10	69.50
03/03/23	ELW	Review and respond to e-mail;	0.20	143.00
03/05/23	PJR	Review and revise draft letters on payment issues for unit owners; instructions to Kate Coady on same.	0.20	139.00
03/06/23	PJR	Telephone call with and email to D. Clemens on COV prosecution and Affidavit #1 of D. Lai for disposition	0.20	139.00
03/07/23	PJR	Emails with L. Chan and T. Takagaki on use of special levy funds for insurance	0.10	69.50
03/07/23	KIC	Correspondence with Hamilton & Co regarding unpaid legal fees;	0.20	76.00
03/07/23	ELW	Review and respond to e-mail;	0.30	214.50

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Date	Timekeeper	Narrative	Hours	Amount
03/08/23	PJR	Review emails between B. Muk and T. Takagaki on insurance; call to T. Takagaki on same	0.10	69.50
03/08/23	PJR	Email to D. Clemens on D. Lai #1 and disposition	0.10	69.50
03/08/23	ELW	Review and respond to e-mail;	0.30	214.50
03/09/23	KIC	Correspondence with J. Brown at Hamilton & Co regarding their records with respect to amounts paid by owners being held in trust ; revise letters to units 3366, 3368 and 802;	0.70	266.00
03/09/23	PJR	Emails with T. Takagaki on draft insurance email to owners	0.20	139.00
03/09/23	PJR	Prepare for and attend disposition hearing on COV bylaw charge before Judge Jamieson; discussions with D. Clemens; reporting email to D. Lai; emails with D. Clemens on form of order	1.50	1,042.50
03/09/23	ELW	Review and respond to e-mail with D. Lai	0.20	143.00
03/14/23	PJR	Meeting with H> Buck, J. darling, B. Muk and D. Lai to discuss issues and closing dynamics	1.00	695.00
03/14/23	ELW	Attend meeting;	0.50	357.50
03/15/23	PJR	Review draft letter to owners from Liquidator; emails with T. Takagaki on same	0.10	69.50
03/16/23	PJR	Emails with D. Lai on Dec. 31 2023 deadline for COV permits and prospect of extension	0.10	69.50
03/23/23	KIC	Correspondence with Hamilton & Co and T. Takagaki regarding outstanding payments for unit owners in arrears; finalize and send letter to Unit 3368 owner, W. De Assis;	0.90	342.00
Total			14.00	8,065.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	1.80	715.00	1,287.00
KATE COADY	KIC	5.40	380.00	2,052.00
PETER ROBERTS	PJR	6.80	695.00	4,726.00
				$8,065.00

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Taxable Other Charges

Photocopies	192.30

Total Fees	**$**	**8,065.00**
Disbursements and Other Charges	**$**	**192.30**
Total PST BC	**$**	**564.56**
Total GST	**$**	**412.87**
CURRENT INVOICE DUE:	**$**	**9,234.72**

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1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 04/28/23
Invoice No. 1228047
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through March 31, 2023

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1228047

Total Professional Fees		8,065.00
Total Taxable Disbursements and Other Charges		192.30
Total BCPST		564.56
Total GST		412.87
Total Amount Due:	**$**	**9,234.72**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:

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

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

REMITTANCE

THIS INVOICE IS PAYABLE UPON RECEIPT.

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 06/23/23
Invoice No. 1234598
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including May 31, 2023, as per attached detail.

Total Professional Fees	$	1,267.00
Total Taxable Disbursements and Other Charges	$	17.70
Total PST BC	$	88.70
Total GST	$	64.24
Current Invoice Due:	**$**	**1,437.63**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

The contents of this invoice may be subject to solicitor-client privilege. Disclosure of a privileged document to a third party could constitute a waiver of privilege. We recommend that prior to voluntarily sharing the contents of this invoice or providing a copy of it to a tax auditor or other person, that you seek legal advice.

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 06/23/23
Invoice No. 1234598
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including May 31, 2023, as follows:

Date	Timekeeper	Narrative	Hours	Amount
04/18/23	PJR	Review entered order from City Of Vancouver on bylaw infraction case; reporting email to D. Lai on same' draft webpage excerpt for COV prosecution	0.20	139.00
04/19/23	PJR	Emails with D. Lai on RDH view of permits	0.10	69.50
04/23/23	PJR	Emails with D. Lai on RDH permit views and COV position	0.10	69.50
05/02/23	PJR	Emails with and call to S. Stephens on Joyce Place commercial leases; emails with to D. Lai on same	0.20	139.00
05/02/23	ELW	Review and respond to e-mail with D. Lai;	0.30	214.50
05/03/23	ELW	Revise contract of purchase and sale;	0.30	214.50
05/15/23	PJR	Call with D. Lai on RDH work and inspections on Tower and townhouses	0.10	69.50
05/24/23	PJR	Call with D. Lai on RDH assessment and mould abatement issues and costs	0.20	139.00
05/30/23	PJR	Email from S. Stephens and reporting email to D. Lai on commercial unit owner appeal settlement	0.10	69.50
05/30/23	ELW	Review and respond to e-mail;	0.20	143.00
Total			1.80	1,267.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	0.80	715.00	572.00
PETER ROBERTS	PJR	1.00	695.00	695.00
				$1,267.00

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Taxable Other Charges

Photocopies	17.70

Total Fees	**$**	**1,267.00**
Disbursements and Other Charges	**$**	**17.70**
Total PST BC	**$**	**88.70**
Total GST	**$**	**64.24**
CURRENT INVOICE DUE:	**$**	**1,437.63**

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Vancouver, BC
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1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 06/23/23
Invoice No. 1234598
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through May 31, 2023

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1234598

Total Professional Fees		1,267.00
Total Taxable Disbursements and Other Charges		17.70
Total BCPST		88.70
Total GST		64.24
Total Amount Due:	**$**	**1,437.63**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:

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

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

REMITTANCE

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 08/18/23
Invoice No. 1242505
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including July 31, 2023, as per attached detail.

Total Professional Fees	$	2,540.00
Total Taxable Disbursements and Other Charges	$	14.40
Total PST BC	$	177.80
Total GST	$	127.72
Current Invoice Due:	**$**	**2,859.92**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 08/18/23
Invoice No. 1242505
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including July 31, 2023, as follows:

Date	Timekeeper	Narrative	Hours	Amount
06/22/23	PJR	Emails from D. Lai on RDH life safety assessment issues	0.10	69.50
06/23/23	PJR	Review emails from D. Lai and T. Takgaki on RDH life safety inspection issue and owner access; Review draft letter to owners; email to D. Lai on same	0.20	139.00
06/27/23	PJR	Emails with H. Buck and D. Lai on Vendor's Third Condition	0.10	69.50
06/29/23	PJR	Emails with D. Lai and H. Buck on 3rd condition; email to J. Carter delivering Notice of Satisfaction of Condition Precedent (Vendor's Third Condition) ; emails with H. Buck on Intracorp extension and deposit ; emails with J Carter and Deirdre Huestis on same	0.30	208.50
06/29/23	ELW	Review and respond to e-mail regarding discharge of caveat;	0.50	357.50
07/04/23	PJR	Email from J. Carter on SL 63 CPL and caveat; call and email to T. Hewitt on same; email to J Carter on CPL discharge; emails with T. Hewitt	0.50	347.50
07/04/23	ELW	Conference with Peter Roberts;	0.20	143.00
07/05/23	ELW	Review and respond to e-mail regarding notice of extension and receipt of funds following this;	0.50	357.50
07/05/23	PJR	Email from D. Huestis on Intracorp signing Purchaser's Second Condition Waiver Extension; Review PSA and reporting email to D. Lai on same	0.20	139.00
07/10/23	ELW	Review file regarding deposit; review and respond to e-mails regarding extension of purchasers contract;	0.50	357.50

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Date	Timekeeper	Narrative	Hours	Amount
07/12/23	PJR	Review emails form D. Lai on RDH and access issues; Review and revise draft letters to Units 3362 and 3370; call with D. Lai on same	0.30	208.50
07/14/23	ELW	Review and respond to e-mails;	0.20	143.00
Total			3.60	2,540.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	1.90	715.00	1,358.50
PETER ROBERTS	PJR	1.70	695.00	1,181.50
				$2,540.00

Taxable Other Charges

Photocopies	14.40

Total Fees	**$**	**2,540.00**
Disbursements and Other Charges	**$**	**14.40**
Total PST BC	**$**	**177.80**
Total GST	**$**	**127.72**
CURRENT INVOICE DUE:	**$**	**2,859.92**

Outstanding Prior Balance

Invoice No.	741318	03/30/22	$	636.72
Invoice No.	744089	04/28/22	$	4,286.91
Invoice No.	1209133	12/09/22	$	21,284.12
Invoice No.	1215269	01/26/23	$	30,873.69
Invoice No.	1215390	01/31/23	$	3,448.69
Invoice No.	1222771	03/30/23	$	8,382.47
Invoice No.	1228047	04/28/23	$	9,234.72
Invoice No.	1234598	06/23/23	$	1,437.63

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LAWSON LUNDELL LLP

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925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 08/18/23
Invoice No. 1242505
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through July 31, 2023

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1242505

Total Professional Fees		2,540.00
Total Taxable Disbursements and Other Charges		14.40
Total BCPST		177.80
Total GST		127.72
Current Invoice Due:		**2,859.92**
Previous Balance:		79,584.95
Total Amount Due:	**$**	**82,444.87**

REMITTANCE

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:

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

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

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Canada V6C 3L2

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 09/20/23
Invoice No. 1245676
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including August 31, 2023, as per attached detail.

Total Professional Fees	$	4,119.00
Total Taxable Disbursements and Other Charges	$	2.10
Total PST BC	$	288.34
Total GST	$	206.06
Current Invoice Due:	**$**	**4,615.49**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 09/20/23
Invoice No. 1245676
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including August 31, 2023, as follows:

Date	Timekeeper	Narrative	Hours	Amount
08/15/23	ELW	Call with D. Lai and H. Buck;	0.30	214.50
08/16/23	PJR	Discussion with Ed Wilson on liquidator power to extend Intracorp PSA; Review legislation and confirmation order; email to Ed Wilson on same	0.40	278.00
08/16/23	ELW	Conference with Peter Roberts; memo to D. Lai;	0.40	286.00
08/23/23	ELW	Review Purchase and Sale Agreement and Court Order; review and respond to e-mails with H. Buck; conference with Peter Roberts;	0.50	357.50
08/24/23	PJR	Call with Ed Wilson and Derek Lai on Intracorp extension request	0.20	139.00
08/24/23	ELW	Conference call with D. Lai; review release; review and respond to e-mails with H. Buck; telephone call to H. Buck;	0.40	286.00
08/25/23	ELW	Review and respond to e-mails with H. Buck;	0.30	214.50
08/30/23	PJR	Review and consider extension agreement; provide comments on court application related to same	0.50	347.50
08/30/23	ELW	Review and respond to e-mail; review Amending Agreement; draft revisions to Agreement;	1.30	929.50
08/31/23	PJR	Review and provide comments to Ed Wilson on revised Extension Agreement	0.30	208.50
08/31/23	ELW	Revise Amending Agreement regarding extension;	1.20	858.00
Total			5.80	4,119.00

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Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	4.40	715.00	3,146.00
PETER ROBERTS	PJR	1.40	695.00	973.00
				$4,119.00

Taxable Other Charges

Photocopies	2.10

Total Fees	**$**	**4,119.00**
Disbursements and Other Charges	**$**	**2.10**
Total PST BC	**$**	**288.34**
Total GST	**$**	**206.06**
CURRENT INVOICE DUE:	**$**	**4,615.49**

Outstanding Prior Balance

Invoice No.	741318	03/30/22	$	636.72
Invoice No.	744089	04/28/22	$	4,286.91
Invoice No.	1209133	12/09/22	$	21,284.12
Invoice No.	1215269	01/26/23	$	30,873.69
Invoice No.	1215390	01/31/23	$	3,448.69
Invoice No.	1222771	03/30/23	$	8,382.47
Invoice No.	1228047	04/28/23	$	9,234.72
Invoice No.	1234598	06/23/23	$	1,437.63
Invoice No.	1242505	08/18/23	$	2,859.92

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Vancouver, BC
Canada V6C 3L2

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 09/20/23
Invoice No. 1245676
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through August 31, 2023

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1245676

Total Professional Fees		4,119.00
Total Taxable Disbursements and Other Charges		2.10
Total BCPST		288.34
Total GST		206.06
Current Invoice Due:		**4,615.49**
Previous Balance:		82,444.87
Total Amount Due:	**$**	**87,060.36**

REMITTANCE

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:

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Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

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Vancouver, BC
Canada V6C 3L2

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 10/23/23
Invoice No. 1248755
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including September 30, 2023, as per attached detail.

Total Professional Fees	$	8,151.00
Total Taxable Disbursements and Other Charges	$	61.90
Total PST BC	$	570.58
Total GST	$	410.65
Current Invoice Due:	**$**	**9,194.12**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 10/23/23
Invoice No. 1248755
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including September 30, 2023, as follows:

Date	Timekeeper	Narrative	Hours	Amount
09/05/23	ELW	Review and respond to e-mails with H. Buck and D. Lai;	0.50	357.50
09/06/23	ELW	Review and respond to e-mail regarding extension; review revised 4th amending agreement;	1.00	715.00
09/07/23	ELW	Review and respond to e-mails with D. Lai; telephone call from D. Lai; review and respond to e-mails with H. Buck;	0.50	357.50
09/11/23	ELW	Review and respond to e-mails with D. Lai; Hart Buck;	0.30	214.50
09/13/23	ELW	Discuss pre closing issue; conference with Lisa Frey; review documents;	0.50	357.50
09/15/23	ELW	Revise 4th amending agreement;	3.30	2,359.50
09/19/23	ELW	Conference with Camille Chisholm regarding CPL; review and respond to e-mails with C. Chancy;	0.30	214.50
09/20/23	ELW	Review and respond to e-mails regarding fourth amending agreement and related issues; review issues regarding future extension and court approval;	0.50	357.50
09/22/23	ELW	Review and respond to e-mails;	0.30	214.50
09/25/23	ELW	Review amendment to purchase agreement;	0.50	357.50
09/26/23	ELW	Telephone call from H. Buck; telephone call from D. Lai; review issues;	0.50	357.50
09/27/23	ELW	Review Amending Agreement; review and respond to e-mails with D. Lai and H. Buck;	1.50	1,072.50

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Date	Timekeeper	Narrative	Hours	Amount
09/29/23	ELW	Revise fourth amending agreement; review and respond to e-mails;	1.70	1,215.50
Total			11.40	8,151.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	11.40	715.00	8,151.00
				$8,151.00

Taxable Other Charges

Photocopies	51.90
Colour Photocopies	10.00

Total Fees	**$**	**8,151.00**
Disbursements and Other Charges	**$**	**61.90**
Total PST BC	**$**	**570.58**
Total GST	**$**	**410.65**
CURRENT INVOICE DUE:	**$**	**9,194.12**

Outstanding Prior Balance

Invoice No.	741318	03/30/22	$	636.72
Invoice No.	744089	04/28/22	$	4,286.91
Invoice No.	1209133	12/09/22	$	21,284.12
Invoice No.	1215269	01/26/23	$	30,873.69
Invoice No.	1215390	01/31/23	$	3,448.69
Invoice No.	1222771	03/30/23	$	8,382.47
Invoice No.	1228047	04/28/23	$	9,234.72
Invoice No.	1234598	06/23/23	$	1,437.63
Invoice No.	1242505	08/18/23	$	2,859.92
Invoice No.	1245676	09/20/23	$	4,615.49

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Vancouver, BC
Canada V6C 3L2

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 10/23/23
Invoice No. 1248755
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through September 30, 2023

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1248755

Total Professional Fees		8,151.00
Total Taxable Disbursements and Other Charges		61.90
Total BCPST		570.58
Total GST		410.65
Current Invoice Due:		**9,194.12**
Previous Balance:		87,060.36
Total Amount Due:	**$**	**96,254.48**

REMITTANCE

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Payment Options:

EFT/Wire Transfer:
HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:

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

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 12/19/23
Invoice No. 1261434
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including November 30, 2023, as per attached detail.

Total Professional Fees	$	34,662.00
Total Taxable Disbursements and Other Charges	$	1,223.57
Total Exempt Disbursements and Other Charges	$	71.27
Total PST BC	$	2,426.34
Total GST	$	1,794.28
Subtotal	$	40,177.46
Less Amount Applied From Trust:	$	(40,177.46)
Current Invoice Due:	**$**	**0.00**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

The contents of this invoice may be subject to solicitor-client privilege. Disclosure of a privileged document to a third party could constitute a waiver of privilege. We recommend that prior to voluntarily sharing the contents of this invoice or providing a copy of it to a tax auditor or other person, that you seek legal advice.

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 12/19/23
Invoice No. 1261434
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including November 30, 2023, as follows:

Date	Timekeeper	Narrative	Hours	Amount
10/03/23	ELW	Review and respond to e-mails regarding Depreciation Report;	0.50	357.50
10/04/23	ELW	Review and respond to e-mails with H. Buck regarding amendment; review revised amending agreement;	0.50	357.50
10/05/23	JXK	Confer with Camille Chisholm regarding discharge of Certificate of Pending Litigation;	0.30	66.00
10/05/23	CEC1	Emails with T. Hewitt; email to C. Chancy regarding CPL discharge; review LTA and requirements for discharging CPL; confer with paralegal regarding same; review CPL and title;	0.80	420.00
10/06/23	JXK	Prepare draft Requisition and Registrar's Certificate; email to Camille Chisholm regarding same;	0.80	176.00
10/11/23	LAF	Instructions from liquidator re extension agreement; Coordinate meeting time with various parties;	0.30	147.00
10/16/23	PJR	Review emails and discuss information meeting with Lisa Frey on Joyce Place sale extension; emails with Camille Chisholm on CPL removal for Dimitrie family claim;	0.20	139.00
10/16/23	ELW	Review and respond to e-mails regarding information meeting;	0.20	143.00
10/16/23	CEC1	Review law regarding obtaining release of CPL; consider options for same; call to court registry regarding requisition for certificate;	0.60	315.00
10/16/23	LAF	Correspondence with client re upcoming information meeting;	0.30	147.00

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Date	Timekeeper	Narrative	Hours	Amount
10/17/23	PJR	Emails with D. Lai and B. Hart on Intracorp on information meeting	0.10	69.50
10/17/23	ELW	Review and respond to e-mails;	0.20	143.00
10/18/23	PJR	Discussion with and instructions to J. Epp on extension approval application; email to D. Lai;	0.20	139.00
10/18/23	JEE	Discuss application to extend closing date with Peter Roberts;	0.30	108.00
10/20/23	JMS	Review file re; owner contact list; review data spreadsheet;	0.70	206.50
10/20/23	ELW	Conference with Lisa Frey and Peter Roberts;	0.30	214.50
10/20/23	LAF	Coordinate Zoom meeting including obtain updated contact information from property manager; Correspondence with client regarding upcoming information meeting;	1.30	637.00
10/23/23	LAF	Review contract and addenda and correspondence to owner from liquidator; Prepare and send update to owners regarding Information Meeting and events leading to same; Communications with client re same; Coordinate invites with broker;	1.40	686.00
10/25/23	PJR	Call with H. Buck on information meeting; email to J. Carter on Intracorp funds in trust;	0.10	69.50
10/26/23	LAF	Coordinate receipt of first instalment of fee regarding Joyce Place extension;	0.30	147.00
10/27/23	LAF	Review correspondence pertaining to upcoming Information Meeting including from broker regarding extension;	0.50	245.00
10/30/23	PJR	Call with D. Lai and Lisa Frey on information meeting; attend virtual information meeting with owners and others; instructions to Jill Epp on approval application;	1.00	695.00
10/30/23	LAF	Send reminder notice to owners; Prepare for and chair information meeting;	1.90	931.00
10/30/23	JEE	Draft notice of application for approval of closing date extension;	2.60	936.00

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Date	Timekeeper	Narrative	Hours	Amount
10/31/23	JEE	Discuss application to approve extension of closing date with Peter Roberts; email D. Lai regarding affidavit; email S. Perndl regarding information meeting;	0.60	216.00
10/31/23	PJR	Review and revise raft notice of application to approve Intracorp extension; review past materials and orders; discussion with and instructions to Jillian Epp;	1.20	834.00
11/01/23	JEE	Draft notice of application to extend closing date; draft affidavit of D. Lai;	2.30	828.00
11/01/23	PJR	Review and revise draft extension application and affidavit of D. Lai; review email from D. Lai on owner letters; email to D. Lai on affidavit;	1.20	834.00
11/02/23	PJR	Email from D. Lai on affidavit revisions; revise D. Lai #2; telephone call to D. Lai on same and Provincial Court extension application; instructions to Jillian Epp on same;	1.30	903.50
11/02/23	JEE	Discuss provincial court application with Peter Roberts;	0.10	36.00
11/02/23	ELW	Review minutes;	0.30	214.50
11/02/23	ELW	Conference with Lisa Frey regarding meeting;	0.30	214.50
11/02/23	LAF	Various communications with owners regarding information meeting; Email to liquidator re extension fee;	0.60	294.00
11/03/23	PJR	Review and revise D. Lai #2; discussion with Lisa Frey and L. Chan of Dwell;	2.10	1,459.50
11/03/23	JEE	Consider notice of application for substituted service;	0.30	108.00
11/03/23	LAF	Prepare and revised meetings notes; Circulate;	0.80	392.00
11/05/23	JEE	Revise affidavit #2 of D. Lai; compile exhibits for same; email Peter Roberts regarding same; draft affidavit #1 of A. Cheng;	1.40	504.00
11/05/23	LAF	Email to Joyce Place owners distributing meeting notes and slides;	0.50	245.00

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Date	Timekeeper	Narrative	Hours	Amount
11/06/23	PJR	Continued revision to D. Lai #2; return telephone call to D. Lai on same; emails from various parties on receiver appointment; emails with D. Lai on owner mortgage issues;	1.40	973.00
11/06/23	KPW	Prepare info meeting note packages for mailing;	0.30	0.00
11/06/23	ELW	Conference with Lisa Frey;	0.20	143.00
11/06/23	JEE	Prepare exhibits package for D. Lai; email D. Lai with affidavit and exhibits to be sworn; prepare schedules to notice of application; draft information notice for chargeholders; revise notice of application;	2.60	936.00
11/06/23	LAF	Email to K. Bahng re website update; Coordinate mail out to non email owners of meeting notes; Correspondence from owners re coordinated proposal to City supporting rezoning application;	1.10	539.00
11/07/23	JMS	Review owner contact list from property manager; update data spreadsheet; prepare spreadsheet of owner contact information;	1.20	354.00
11/07/23	PJR	Review and revise notice of application and sub-service materials; emails with L. Chan of Dwell; discussion with Jillian Epp and Jillian Sych; emails with D. Lai on draft affidavit;	1.20	834.00
11/07/23	ELW	Review and respond to e-mails with realtor and purchaser's lawyer regarding court hearing;	0.30	214.50
11/07/23	JEE	Emails with D. Lai and Lisa Frey regarding owners expressing mortgage concerns; revise affidavit #2 of D. Lai; emails with Jillian Sych regarding list of owners;	1.30	468.00
11/07/23	LAF	Review applicable correspondence and meeting notes; Email to J. Epp re owner concerns;	0.50	245.00
11/08/23	PJR	Email to J. Carter with draft materials; telephone calls with D. Lai on affidavit content; revise D. Lai #2; email to D. Lai on same;	0.50	347.50
11/08/23	ELW	Conference with Peter Roberts; review materials;	0.40	286.00
11/08/23	JEE	Revise affidavit #1 of Ashley Cheng; finalize schedules to notice of application;	0.70	252.00
11/09/23	JMS	Review draft affidavit;	0.40	118.00

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Date	Timekeeper	Narrative	Hours	Amount
11/09/23	PJR	Review and revise form of sub-service order; instructions to Jillian Epp;	0.20	139.00
11/09/23	JEE	Finalize affidavit #1 of Ashley Cheng; draft order made after application for substituted service;	0.90	324.00
11/10/23	JEE	Finalize materials for application for substituted service and approval of Fourth Amendment;	1.40	504.00
11/13/23	JEE	Draft application to a judge in provincial court action;	0.50	180.00
11/14/23	JEE	Prepare for application; attend Chambers for substituted service application;	2.20	792.00
11/15/23	PJR	Emails with J. Carter on SL 63 CPL removal; instructions to Jillian Epp on same;	0.20	139.00
11/15/23	ELW	Conference with Peter Roberts; review and respond to e-mails;	0.50	357.50
11/15/23	JEE	Discuss application to cancel CPL with Peter Roberts; email D. Lai regarding application for substituted service; consider application to cancel CPL; email Peter Roberts regarding same;	1.20	432.00
11/16/23	PJR	Emails with Jillian Epp on sub-service issues and CPL removal;	0.20	139.00
11/16/23	ELW	Conference with Peter Roberts;	0.30	214.50
11/16/23	JEE	Email S. Dimitrie regarding CPL on title; email M. Lecovin regarding same; prepare cover letter for substituted service to chargeholders; prepare cover letters for substituted service to owners; prepare substituted service materials; email Peter Roberts regarding requisition to cancel CPL; email L. Chan about posting application materials in lobby;	4.50	1,620.00
11/17/23	PJR	Email to J. Carter with filed materials; email from and to Peter Byrne on application response;	0.20	139.00
11/17/23	JEE	Ensure steps to comply with substituted service order are complete; draft affidavit of service of Ashley Cheng; contact registry and land title office to confirm process to cancel CPL; draft requisition and certificate of dismissal;	3.00	1,080.00

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Date	Timekeeper	Narrative	Hours	Amount
11/20/23	PJR	Email with petition form P. Byrne; instructions to Jillian Epp; emails from owners; email back to Cynthia Guillergan; review and revise Ashley Cheng affidavit on service and owner responses; review and revise application for provincial court order extension; instructions to Jillian Epp;	0.50	347.50
11/20/23	JEE	Finalize affidavit of service of Ashley Cheng; prepare supporting exhibits for same;	1.20	432.00
11/21/23	JEE	Draft application in provincial court action;	0.80	288.00
11/22/23	ASC	Retrieving documents at the BC Court of Appeal;	0.70	192.50
11/22/23	JEE	Email D. Lai and T. Takagaki regarding provincial court application; revise application in provincial action;	0.90	324.00
11/23/23	PJR	Email to J. Carter on CPL discharge;	0.10	69.50
11/23/23	JEE	Email T. Takagaki regarding provincial court application; email D. Lai regarding cancellation of CPL; confirm process to bring provincial application;	1.00	360.00
11/24/23	PJR	Email with J. Carter on discharge of caveat; emails with J. Cytrynbaum owner responses;	0.20	139.00
11/24/23	ELW	Review and respond to e-mails regarding CPL;	0.30	214.50
11/24/23	JEE	Email Amanda Lourenco and Jayda Peterson regarding discharge of caveat;	0.40	144.00
11/24/23	JAP	Receive instructions from lawyer; draft Form 17 cancellation of caveat; legal research s. 290-293 of the Land Title Act; discussion with paralegal; draft Form 39 s. 290(1) of the LTA; send of the same to lawyer for review;	2.30	230.00
11/26/23	PJR	Review and revise application and T. Takagaki affidavit #1 for COV deadline extension application; emails with Jillian Epp on same;	0.70	486.50
11/26/23	JEE	Draft affidavit of T. Takagaki;	2.60	936.00
11/27/23	JEE	Revise affidavit of T. Takagaki; emails with T. Takagaki regarding same; prepare supporting exhibits for same;	1.40	504.00

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Date	Timekeeper	Narrative	Hours	Amount
11/28/23	JEE	Finalize affidavit of T. Tetsu; contact counsel for responding parties in BCSC action regarding application on December 4;	2.80	1,008.00
11/28/23	JAP	Meeting with lawyers regarding discharge of caveat; revise Form 17 per lawyers instructions; email of the same;	0.90	90.00
11/29/23	PJR	Review and revise draft material for Provincial Court extension on bylaw prosecution; instructions to Jillian Epp; review and revise extension approval order;	0.30	208.50
11/29/23	JEE	Email Ed Wilson regarding closing date; finalize application materials for provincial application; email D. Clements regarding same; prepare for application to extend provincial action;	4.20	1,512.00
11/30/23	JEE	Prepare for application in Provincial Court; attend provincial court; email D. Lai regarding order granting extension in bylaw proceedings.	2.30	828.00
Total			79.40	34,662.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	4.30	775.00	3,074.50
JILLIAN SYCH	JMS	2.30	310.00	678.50
LISA FREY	LAF	9.50	560.00	4,655.00
CAMILLE CHISHOLM	CEC1	1.40	575.00	735.00
PETER ROBERTS	PJR	13.10	775.00	9,104.50
JILLIAN EPP	JEE	43.50	420.00	15,660.00
JAS KING	JXK	1.10	235.00	242.00
AMIT CHANDI	ASC	0.70	275.00	192.50
JAYDA PETERSON	JAP	3.20	100.00	320.00
				$34,662.00

Taxable Other Charges

Photocopies	966.30
Trust Investment Charge	35.00

Non-Taxable Disbursements

West Coast Title Searches (E)	71.27

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Taxable Disbursements

Cash Disbursements - Wix.com Web Hosting for joyceplacestrata.com (KYB m/c)	21.33
LTSA Service Charge	5.55
LTSA Services	30.93
Agent Fees	36.00
West Coast Title Searches	128.46

Total Fees	**$**	**34,662.00**
Disbursements and Other Charges	**$**	**1,294.84**
Total PST BC	**$**	**2,426.34**
Total GST	**$**	**1,794.28**
Subtotal	**$**	**40,177.46**
Less Amount Applied From Trust:	**$**	**(40,177.46)**
CURRENT INVOICE DUE:	**$**	**0.00**

Outstanding Prior Balance

Invoice No.	1215269	01/26/23	$	7,081.44
Invoice No.	1215390	01/31/23	$	3,448.69
Invoice No.	1222771	03/30/23	$	8,382.47
Invoice No.	1228047	04/28/23	$	9,234.72
Invoice No.	1234598	06/23/23	$	1,437.63
Invoice No.	1242505	08/18/23	$	2,859.92
Invoice No.	1245676	09/20/23	$	4,615.49
Invoice No.	1248755	10/23/23	$	9,194.12

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 12/19/23
Invoice No. 1261434
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through November 30, 2023

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1261434

Total Professional Fees		34,662.00
Total Taxable Disbursements and Other Charges		1,223.57
Total Exempt Disbursements and Other Charges		71.27
Total BCPST		2,426.34
Total GST		1,794.28
Subtotal		40,177.46
Less Amount Applied From Trust:		(40,177.46)
Total Amount Due:	**$**	**0.00**

REMITTANCE

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:

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

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

REMITTANCE

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Vancouver, BC
Canada V6C 3L2

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 12/31/23
Invoice No. 1264704
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including December 31, 2023, as per attached detail.

Total Professional Fees	$	4,673.00
Total Taxable Disbursements and Other Charges	$	345.97
Total Exempt Disbursements and Other Charges	$	113.77
Total PST BC	$	327.11
Total GST	$	250.95
Current Invoice Due:	**$**	**5,710.80**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 12/31/23
Invoice No. 1264704
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including December 31, 2023, as follows:

Date	Timekeeper	Narrative	Hours	Amount
12/01/23	PJR	Call with J. Van Netten on mortgagee position;	0.10	69.50
12/03/23	PJR	Review application materials and prepare for extension approval hearing;	1.00	695.00
12/04/23	JAP	Receive email from lawyer regarding notice of registration for CPL; pull post-registration title search; email to lawyer for e-signature on cancellation of caveat;	0.40	40.00
12/04/23	PJR	Prepare for and attend approval of Extension Agreement; approve and enter form of order; call to D. Lai; email to client and Intracorp; email to D. Lai on rent-back to townhouses; email entered order to parties;	2.20	1,529.00
12/04/23	JEE	Prepare additional materials for application; attend hearing; draft summary of proceedings for website;	1.60	576.00
12/04/23	ELW	Conference with Peter Roberts regarding Court Order;	0.30	214.50
12/05/23	ELW	Review and respond to e-mails regarding deposit;	0.20	143.00
12/05/23	PJR	Emails and instructions on Extension Fee deposit and receipt	0.10	69.50
12/05/23	JAP	Register Form 17 Cancellation of Caveat with the Land Title Office; email to lawyers of the same;	0.20	20.00
12/05/23	JEE	Respond to chargeholder's inquiries; email D. Clements regarding draft order;	0.30	108.00
12/06/23	JEE	Email chargeholder regarding website; email D. Clements regarding draft order;	0.30	108.00

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Date	Timekeeper	Narrative	Hours	Amount
12/07/23	JAP	Receive notice of registration for cancellation of caveat; pull updated title; send email to lawyers;	0.20	20.00
12/08/23	JEE	Respond to chargeholder's inquiry;	0.10	36.00
12/11/23	LAF	Coordinate distribution of update letter from liquidator;	0.40	196.00
12/11/23	KPW	Send out letter to owners regarding status of extension and insurance;	0.30	30.00
12/12/23	PJR	Review email and draft Pooni letter from T. Takagaki; email to T. Takagaki; call with D. Lai;	0.10	69.50
12/12/23	ELW	Review and respond to e-mails;	0.30	214.50
12/14/23	KPW	Print and send letters to owners;	0.30	30.00
12/14/23	ELW	Conference with Lisa Frey;	0.20	143.00
12/14/23	LAF	Coordinate distribution of Pooni Group letter to owners;	0.30	147.00
12/19/23	ELW	Review and respond to e-mails.	0.30	214.50
Total			9.20	4,673.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	1.30	715.00	929.50
LISA FREY	LAF	0.70	490.00	343.00
KRYSTAL WONG	KPW	0.60	100.00	60.00
PETER ROBERTS	PJR	3.50	695.00	2,432.50
JILLIAN EPP	JEE	2.30	360.00	828.00
JAYDA PETERSON	JAP	0.80	100.00	80.00
				$4,673.00

Taxable Other Charges

Photocopies	63.00

Non-Taxable Disbursements

LTSA Services (E)	33.77
Expense Report	80.00

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Taxable Disbursements

Cash Disbursements - Wix.com - Web Page Hosting for Joyce Place Strata Oct 12 - KYB m/c	256.80
LTSA Service Charge	5.55
LTSA Services	20.62

Total Fees	**$**	**4,673.00**
Disbursements and Other Charges	**$**	**459.74**
Total PST BC	**$**	**327.11**
Total GST	**$**	**250.95**
CURRENT INVOICE DUE:	**$**	**5,710.80**

Outstanding Prior Balance

Invoice No.	1215269	01/26/23	$	7,081.44
Invoice No.	1215390	01/31/23	$	3,448.69
Invoice No.	1222771	03/30/23	$	8,382.47
Invoice No.	1228047	04/28/23	$	9,234.72
Invoice No.	1234598	06/23/23	$	1,437.63
Invoice No.	1242505	08/18/23	$	2,859.92
Invoice No.	1245676	09/20/23	$	4,615.49
Invoice No.	1248755	10/23/23	$	9,194.12

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Canada V6C 3L2

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 12/31/23
Invoice No. 1264704
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through December 31, 2023

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1264704

Total Professional Fees		4,673.00
Total Taxable Disbursements and Other Charges		345.97
Total Exempt Disbursements and Other Charges		113.77
Total BCPST		327.11
Total GST		250.95
Total Amount Due:	**$**	**5,710.80**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:

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

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

REMITTANCE

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LAWSON LUNDELL LLP

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925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 02/16/24
Invoice No. 1268670
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including January 31, 2024, as per attached detail.

Total Professional Fees	$	1,346.00
Total Taxable Disbursements and Other Charges	$	6.00
Total PST BC	$	94.22
Total GST	$	67.60
Current Invoice Due:	**$**	**1,513.82**

This is our account.

Lawson Lundell LLP

Per: 

Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 02/16/24
Invoice No. 1268670
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including January 31, 2024, as follows:

Date	Timekeeper	Narrative	Hours	Amount
01/09/24	ELW	Review and respond to e-mails;	0.20	155.00
01/11/24	KPW	Prepare letters to owners regarding Zoom meetings; print and send out the letters;	0.60	60.00
01/11/24	LAF	Draft and send email update to owner regarding Pooni hosted zoom meeting; Coordinate letter sent to owners without email addresses;	0.80	448.00
01/12/24	PJR	Email from and to S. Hamilton on RBC response; review RBC response; email to L. Goldberg on same;	0.20	155.00
01/16/24	ELW	Review and respond to e-mails with D. Lai;	0.30	232.50
01/23/24	LAF	Circulate email update to owners regarding rezoning;	0.30	168.00
01/24/24	KPW	Prepare and mail letters to Owners regarding update to rezoning;	0.50	50.00
01/31/24	PJR	Review and comment on draft letter to owners from Liquidator.	0.10	77.50
Total			3.00	1,346.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	0.50	775.00	387.50
LISA FREY	LAF	1.10	560.00	616.00
KRYSTAL WONG	KPW	1.10	100.00	110.00
PETER ROBERTS	PJR	0.30	775.00	232.50
				$1,346.00

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Taxable Other Charges

Photocopies	6.00

Total Fees	**$**	**1,346.00**
Disbursements and Other Charges	**$**	**6.00**
Total PST BC	**$**	**94.22**
Total GST	**$**	**67.60**
CURRENT INVOICE DUE:	**$**	**1,513.82**

Outstanding Prior Balance

Invoice No.	1215269	01/26/23	$	7,081.44
Invoice No.	1215390	01/31/23	$	3,448.69
Invoice No.	1222771	03/30/23	$	8,382.47
Invoice No.	1228047	04/28/23	$	9,234.72
Invoice No.	1234598	06/23/23	$	1,437.63
Invoice No.	1242505	08/18/23	$	2,859.92
Invoice No.	1245676	09/20/23	$	4,615.49
Invoice No.	1248755	10/23/23	$	9,194.12
Invoice No.	1264704	12/31/23	$	5,710.80

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LAWSON LUNDELL LLP

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 02/16/24
Invoice No. 1268670
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through January 31, 2024

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1268670

Total Professional Fees		1,346.00
Total Taxable Disbursements and Other Charges		6.00
Total BCPST		94.22
Total GST		67.60
Total Amount Due:	**$**	**1,513.82**

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Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
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V6E 4T5

Invoice Date: 03/25/24
Invoice No. 1274915
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including February 29, 2024, as per attached detail.

Total Professional Fees	$	1,942.50
Total Taxable Disbursements and Other Charges	$	69.00
Total PST BC	$	135.98
Total GST	$	100.58
Current Invoice Due:	**$**	**2,248.06**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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VANCOUVER, BC
V6E 4T5

Invoice Date: 03/25/24
Invoice No. 1274915
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including February 29, 2024, as follows:

Date	Timekeeper	Narrative	Hours	Amount
02/06/24	ELW	Conference with Lisa Frey; assemble supporting documents;	0.70	542.50
02/06/24	LAF	Prepare for and attend AGM;	1.90	1,064.00
02/09/24	LAF	Revise AGM minutes.	0.60	336.00
Total			3.20	1,942.50

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	0.70	775.00	542.50
LISA FREY	LAF	2.50	560.00	1,400.00
				$1,942.50

Taxable Other Charges

Photocopies	69.00

Total Fees	**$**	**1,942.50**
Disbursements and Other Charges	**$**	**69.00**
Total PST BC	**$**	**135.98**
Total GST	**$**	**100.58**
CURRENT INVOICE DUE:	**$**	**2,248.06**

Outstanding Prior Balance

Invoice No.	1215269	01/26/23	$	7,081.44
Invoice No.	1215390	01/31/23	$	3,448.69
Invoice No.	1222771	03/30/23	$	8,382.47

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Invoice No.	1228047	04/28/23	$	9,234.72
Invoice No.	1234598	06/23/23	$	1,437.63
Invoice No.	1242505	08/18/23	$	2,859.92
Invoice No.	1245676	09/20/23	$	4,615.49
Invoice No.	1248755	10/23/23	$	9,194.12
Invoice No.	1264704	12/31/23	$	5,710.80
Invoice No.	1268670	02/16/24	$	1,513.82

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VANCOUVER, BC
V6E 4T5

Invoice Date: 03/25/24
Invoice No. 1274915
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through February 29, 2024

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1274915

Total Professional Fees		1,942.50
Total Taxable Disbursements and Other Charges		69.00
Total BCPST		135.98
Total GST		100.58
Total Amount Due:	**$**	**2,248.06**

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HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 06/24/24
Invoice No. 1287222
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including May 31, 2024, as per attached detail.

Total Professional Fees	$	16,353.00
Total Taxable Disbursements and Other Charges	$	1,157.40
Total Exempt Disbursements and Other Charges	$	699.77
Total PST BC	$	1,144.71
Total GST	$	875.52
Current Invoice Due:	**$**	**20,230.40**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 06/24/24
Invoice No. 1287222
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including May 31, 2024, as follows:

Date	Timekeeper	Narrative	Hours	Amount
04/24/24	PJR	Call with D. Lai, H. Buck and J. Darling on status of closing;	0.10	77.50
05/02/24	PJR	Emails with D. Lai and H. Buck on Joyce closing; telephone call with D. Lai on same;	0.10	77.50
05/02/24	ELW	Review and respond to emails to Terra Law;	0.50	387.50
05/03/24	ELW	Review and respond to emails;	0.30	232.50
05/03/24	ELW	Review and respond to emails; Intra corp and Terra Law regarding lease; RF releases and tenancy agreements, review and respond to emails with B. Lin;	1.30	1,007.50
05/07/24	ELW	Review and respond to emails;	0.30	232.50
05/07/24	LAF	Review specifics of upcoming waiver date and deposit requirements; Email to P. Roberts re same;	0.50	280.00
05/08/24	ELW	Review and respond to emails regarding deposit;	0.30	232.50
05/08/24	LAF	Review notice of waiver of purchaser's second condition and email to purchaser counsel acknowledging same;	0.30	168.00
05/10/24	LAF	Review communication to owners; Email to D. Lai re same;	0.30	168.00
05/13/24	ELW	Review and respond to emails with D. Lai regarding closing;	0.30	232.50
05/13/24	ELW	Review and respond to emails regarding tenant protection program;	0.30	232.50
05/14/24	JMS	Discussion regarding title searches and charges;	0.40	124.00

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Date	Timekeeper	Narrative	Hours	Amount
05/14/24	ELW	Review and respond to email regarding leases;	0.30	232.50
05/15/24	NMB	Obtain parcel subscription to all 63 strata lots;	0.60	60.00
05/15/24	NMB	Obtain title searches for all strata lots;	0.50	50.00
05/15/24	LAF	Meeting with M. Mussenden re critical dates;	0.30	168.00
05/16/24	NMB	Organize title binder; review all titles; obtain copies of the financial charges;	2.70	270.00
05/16/24	MEM2	Critical dates table clean up for Lisa Frey;	0.60	165.00
05/16/24	ELW	Review and respond to email D. Lai regarding leases etcetera; review file;	0.50	387.50
05/17/24	JMS	Review file; update data spreadsheet;	0.70	217.00
05/21/24	NMB	Review title binder; obtain further charges on title; update main data spreadsheet;	0.70	70.00
05/21/24	JMS	Review contract of purchase and sale and all related addendums and extensions; discussions regarding closing matters; review titles and financial charges; update data spreadsheet;	2.50	775.00
05/21/24	MEM2	Critical dates table clean up for Lisa Frey;	4.20	1,155.00
05/21/24	ELW	Review Purchase Agreement; review file;	1.30	1,007.50
05/21/24	LAF	Discussion with M. Mussenden re critical dates;	0.50	280.00
05/22/24	ELW	Review Purchase Agreement; draft issues memo; review and respond to email; memo to liquidator;	1.50	1,162.50
05/23/24	PJR	Team meeting to prepare for closing; call to S. Hamilton;	0.90	697.50
05/23/24	JMS	Review deposits and purchase agreement; discussions regarding closing matters;	2.20	682.00
05/23/24	ELW	Prepare issues memo; conference with conveyancing team; review and respond to email; memo to liquidator;	2.00	1,550.00
05/23/24	LAF	Prepare for and attend team review meeting regarding closing preparations and preliminary issues;	1.40	784.00

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Date	Timekeeper	Narrative	Hours	Amount
05/24/24	JMS	Review purchase and sale agreement; prepare list of closing documents; update data spreadsheet;	2.60	806.00
05/24/24	NMB	Email to A. Thornhill confirming receipt of parking assignments for both strata lots; drafting an action plan;	0.80	80.00
05/24/24	ELW	Memo to Liquidator (D. Lai); review closing agenda;	0.70	542.50
05/27/24	JMS	Review Court Order; update data spreadsheet; prepare resolution of strata corporation and interest schedule; discussion regarding closing documents;	2.50	775.00
05/27/24	NMB	Meeting with senior paralegal regarding closing agenda and preparation of closing documents; prepare list of matter at hand;	1.00	100.00
05/28/24	JMS	Prepare interest schedule and fractional interest schedule; prepare resolution of strata council re: authorization of liquidator to sign closing documents; discussion regarding appointment of liquidator document for filing in Land Title Office;	1.50	465.00
05/29/24	PJR	Emails with and discussion with Ed Wilson on Reasons, para. 166 and court order on tenancies;	0.10	77.50
05/30/24	ELW	Review and respond to email;	0.20	155.00
05/30/24	JMS	Update data spreadsheet with owner's current contact details received from property manager; discussion regarding owners' information sheets.	0.60	186.00
Total			38.40	16,353.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	9.80	775.00	7,595.00
JILLIAN SYCH	JMS	13.00	310.00	4,030.00
LISA FREY	LAF	3.30	560.00	1,848.00
PETER ROBERTS	PJR	1.20	775.00	930.00
NIKKA BORJA	NMB	6.30	100.00	630.00
MEGAN MUSSENDEN	MEM2	4.80	275.00	1,320.00
				$16,353.00

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Taxable Other Charges

Photocopies	128.10

Non-Taxable Disbursements

LTSA Services (E)	599.77
West Coast Title Searches (E)	100.00

Taxable Disbursements

BC Online	7.00
BC Online Service Charge	1.50
LTSA Service Charge	278.00
LTSA Services	696.80
West Coast Title Searches	46.00

Total Fees	**$**	**16,353.00**
Disbursements and Other Charges	**$**	**1,857.17**
Total PST BC	**$**	**1,144.71**
Total GST	**$**	**875.52**
CURRENT INVOICE DUE:	**$**	**20,230.40**

Outstanding Prior Balance

Invoice No.	1215269	01/26/23	$	7,081.44
Invoice No.	1215390	01/31/23	$	3,448.69
Invoice No.	1222771	03/30/23	$	8,382.47
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Invoice No.	1242505	08/18/23	$	2,859.92
Invoice No.	1245676	09/20/23	$	4,615.49
Invoice No.	1248755	10/23/23	$	9,194.12
Invoice No.	1264704	12/31/23	$	5,710.80
Invoice No.	1268670	02/16/24	$	1,513.82
Invoice No.	1274915	03/25/24	$	2,248.05

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1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 06/24/24
Invoice No. 1287222
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through May 31, 2024

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1287222

Total Professional Fees		16,353.00
Total Taxable Disbursements and Other Charges		1,157.40
Total Exempt Disbursements and Other Charges		699.77
Total BCPST		1,144.71
Total GST		875.52
Total Amount Due:	**$**	**20,230.40**

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 07/19/24
Invoice No. 1289212
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including June 30, 2024, as per attached detail.

Total Professional Fees	$	8,636.00
Total Taxable Disbursements and Other Charges	$	9.80
Total Exempt Disbursements and Other Charges	$	129.00
Total PST BC	$	604.52
Total GST	$	432.29
Current Invoice Due:	**$**	**9,811.61**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 07/19/24
Invoice No. 1289212
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including June 30, 2024, as follows:

Date	Timekeeper	Narrative	Hours	Amount
06/03/24	ELW	Review and respond to emails;	0.30	232.50
06/03/24	JMS	Discussions regarding leases and closing matters;	0.40	124.00
06/04/24	ELW	Review and respond to emails;	0.30	232.50
06/06/24	JMS	Review memo to Intracorp; discussions regarding information to Owner; prepare draft form of information memo to owners;	0.60	186.00
06/07/24	JMS	Prepare shell closing documents; update data spreadsheet;	2.10	651.00
06/09/24	ELW	Meeting with Nikka Borja;	0.30	232.50
06/12/24	ELW	Review and respond to emails regarding unit 1004 building lien; Revise investment issue;	0.40	310.00
06/13/24	ELW	Review owner memo; Review and respond to emails;	0.40	310.00
06/14/24	LAF	Email to owners re builder's lien;	0.30	168.00
06/14/24	JMS	Draft letter to owners of Unit 1004/SL 57 regarding claim of builders lien;	0.40	124.00
06/18/24	ELW	Review and respond to emails with Derek Lai regarding insurance;	0.20	155.00
06/22/24	ELW	Review memo to owners; Review Purchase and Sale Agreement regarding rent back; Review issues regarding Strata;	1.40	1,085.00
06/22/24	ELW	Review reporting CT Client;	0.30	232.50
06/24/24	JMS	Review information memo; update client information sheet; prepare schedule of rent back fees;	1.10	341.00

The contents of this invoice may be subject to solicitor-client privilege. Disclosure of a privileged document to a third party could constitute a waiver of privilege. We recommend that prior to voluntarily sharing the contents of this invoice or providing a copy of it to a tax auditor or other person, that you seek legal advice.

Date	Timekeeper	Narrative	Hours	Amount
06/25/24	ELW	Review and respond to emails with Terra Law regarding closing dates;	0.50	387.50
06/25/24	ELW	Call with Jillian Sych and Lisa Frey regarding builders lien;	0.30	232.50
06/25/24	JMS	Review information memo to owners; discussions regarding closing procedures;	0.50	155.00
06/25/24	LAF	Revisions to memorandum; Consider preliminary issues pertaining to tenant relocation; Email to Ed Wilson re same;	1.20	672.00
06/25/24	ELW	Review and respond to emails with B.Y. Muk;	0.20	155.00
06/26/24	ELW	Review and respond to emails; review materials;	0.50	387.50
06/26/24	LAF	Revisions to memo;	0.50	280.00
06/26/24	ELW	Review and respond to emails regarding memo to owners;	0.30	232.50
06/26/24	ELW	Review and respond to emails with L. Chang regarding Form K;	0.20	155.00
06/27/24	JMS	Discussions regarding closing; update information memorandum to owners; draft hardship letter to Land Title Office Registrar; update closing agenda;	0.90	279.00
06/27/24	LAF	Consider council member questions regarding owners agreements; Revise memorandum;	0.60	336.00
06/27/24	ELW	Revise memo to owner regarding closing; Review and respond to emails with L. Chang; Review and respond to emails;	0.50	387.50
06/28/24	JMS	Review file; update data spreadsheet;	0.80	248.00
06/28/24	LAF	Update to owner re next steps;	0.20	112.00
06/28/24	ELW	Revise memo to owners.	0.30	232.50
Total			16.00	8,636.00

The contents of this invoice may be subject to solicitor-client privilege. Disclosure of a privileged document to a third party could constitute a waiver of privilege. We recommend that prior to voluntarily sharing the contents of this invoice or providing a copy of it to a tax auditor or other person, that you seek legal advice.

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	6.40	775.00	4,960.00
JILLIAN SYCH	JMS	6.80	310.00	2,108.00
LISA FREY	LAF	2.80	560.00	1,568.00
				$8,636.00

Taxable Other Charges

Photocopies	7.80

Non-Taxable Disbursements

LTSA Services (E)	129.00

Taxable Disbursements

LTSA Service Charge	2.00

Total Fees	**$**	**8,636.00**
Disbursements and Other Charges	**$**	**138.80**
Total PST BC	**$**	**604.52**
Total GST	**$**	**432.29**
CURRENT INVOICE DUE:	**$**	**9,811.61**

Outstanding Prior Balance

Invoice No.	1215269	01/26/23	$	7,081.44
Invoice No.	1215390	01/31/23	$	3,448.69
Invoice No.	1222771	03/30/23	$	8,382.47
Invoice No.	1228047	04/28/23	$	9,234.72
Invoice No.	1234598	06/23/23	$	1,437.63
Invoice No.	1242505	08/18/23	$	2,859.92
Invoice No.	1245676	09/20/23	$	4,615.49
Invoice No.	1248755	10/23/23	$	9,194.12
Invoice No.	1264704	12/31/23	$	5,710.80
Invoice No.	1268670	02/16/24	$	1,513.82
Invoice No.	1274915	03/25/24	$	2,248.05
Invoice No.	1287222	06/24/24	$	20,230.40

The contents of this invoice may be subject to solicitor-client privilege. Disclosure of a privileged document to a third party could constitute a waiver of privilege. We recommend that prior to voluntarily sharing the contents of this invoice or providing a copy of it to a tax auditor or other person, that you seek legal advice.

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 07/19/24
Invoice No. 1289212
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through June 30, 2024

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1289212

Total Professional Fees		8,636.00
Total Taxable Disbursements and Other Charges		9.80
Total Exempt Disbursements and Other Charges		129.00
Total BCPST		604.52
Total GST		432.29
Total Amount Due:	**$**	**9,811.61**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:

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

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

REMITTANCE

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 08/19/24
Invoice No. 1293616
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including July 31, 2024, as per attached detail.

Total Professional Fees		$	27,694.00
Total Taxable Disbursements and Other Charges		$	235.88
Total Exempt Disbursements and Other Charges		$	189.20
Total PST BC		$	1,938.58
Total GST		$	1,396.49
Current Invoice Due:	**CAD**	**$**	**31,454.15**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

The contents of this invoice may be subject to solicitor-client privilege. Disclosure of a privileged document to a third party could constitute a waiver of privilege. We recommend that prior to voluntarily sharing the contents of this invoice or providing a copy of it to a tax auditor or other person, that you seek legal advice.

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 08/19/24
Invoice No. 1293616
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including July 31, 2024, as follows:

Date	Timekeeper	Narrative	Hours	Amount
07/01/24	COC	Researching uplands consent agreements;	2.60	715.00
07/02/24	LAF	Various investigations and email to owner re builder's lien in anticipation of closing;	1.10	616.00
07/02/24	ELW	Review and Respond to Emails from purchasers lawyer; draft email to Owners and Tenants (Residential and Commercial);	1.00	775.00
07/02/24	PJR	Review and revise email to owners on closing; instructions to Nikka Borja;	0.10	77.50
07/02/24	ELW	Review and respond to email with Terra Law regarding Owner information and leases;	0.60	465.00
07/03/24	BEG	Email from Chelsea Colwill; search ILRR and LTSA for tenures; draft summary sheet setting out lots/tenures and other relevant information; conference with Chelsea Colwill regarding results;	2.40	588.00
07/03/24	ELW	Review memo to owner; Review and respond to emails regarding Notices;	0.70	542.50
07/03/24	COC	Researching uplands consent agreements;	1.50	412.50
07/08/24	ELW	Call with Lisa Frey regarding; Call with J. Sych;	0.40	310.00
07/08/24	JMS	Review client information forms; update data spreadsheet; review titles; update financial spreadsheet; receive and review various residential tenancy agreements; receive and review reference plan;	2.90	899.00

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Date	Timekeeper	Narrative	Hours	Amount
07/09/24	JMS	Update data spreadsheet with owner' updated contact information; prepare releases of all financial charges; update list of financial charges; receive and review pending judgment and release of claim of builders liens; discussion regarding closing matters and payouts of existing financial charges;	3.90	1,209.00
07/09/24	ELW	Letter to Surveyor regarding fee; Call with Lisa Frey regarding judgement on Unit 1004;	0.50	387.50
07/09/24	LAF	Email to unit owner re builder's lien and discharge of the same prior to closing;	0.40	224.00
07/10/24	LAF	Coordinate meeting with Vietnamese speaking owner to review package;	0.90	504.00
07/11/24	ELW	Internal Team Meeting;	1.00	775.00
07/11/24	LAF	Discuss closing status;	0.40	224.00
07/11/24	JMS	Receive and review information sheets; update data spreadsheet; discussions regarding closing matters; email to surveyor requesting amendments to reference plan; email to realtor requesting listing commission;	2.50	775.00
07/12/24	JMS	Receive and review updated reference plan; receive and review commission statement; update data spreadsheet;	0.40	124.00
07/12/24	ELW	Review and respond to email with Deirdre regarding tenancies; review Notice to owners; Review and respond to emails;	0.80	620.00
07/12/24	LAF	Review and comment on proposed email to client;	0.30	168.00
07/15/24	LAF	Email to non-resident owner re various matters to finalize adjustments and provide tenancy agreement;	0.30	168.00
07/15/24	JMS	Receive and review client information forms; update data spreadsheet; receive and review residential tenancy agreements; obtain security deposit interest calculations; update draft Statement of Adjustments and Trust Reconciliation Statement; prepare signing folders for vendor closing documents;	2.50	775.00

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Date	Timekeeper	Narrative	Hours	Amount
07/16/24	JMS	Prepare letters requesting various payout statements; receive and review client information forms and residential tenancy agreements; update data spreadsheet; discussions regarding closing matters;	2.40	744.00
07/17/24	ELW	Prepare for closing; Review and Respond to emails;	1.00	775.00
07/18/24	JMS	Receive and review information sheets and tenancy agreements; prepare schedule for Purchaser's lawyer; discussion regarding various closing matters; obtain update title search for Strata Lot 57;	3.80	1,178.00
07/18/24	ELW	Attend Meeting with Closing Group; Memo to Terra Law; Review documents;	3.00	2,325.00
07/18/24	LAF	Email to owner re title ownership; Meeting to discuss closing status;	0.60	336.00
07/19/24	LAF	Review draft memo;	0.20	112.00
07/19/24	ELW	Finalize email to Terra Law regarding closing; email to Terra Law;	1.30	1,007.50
07/22/24	JMS	Receive and review information sheets; update data spreadsheet; prepare Vendor's Statement of Adjustments; draft Trust Reconciliation Statement; discussions regarding closing matters;	4.20	1,302.00
07/22/24	LAF	Email to Hamilton & Company confirming no further involvement; Email to owner re title matter;	0.50	280.00
07/23/24	JMS	Receive and review information sheets; update data spreadsheet; review titles; prepare release of legal notation by effluxion of time for SL 15/Unit 304 and attend to registration of same; discussion re legal notation for SL 61/Unit 1002 and release of same vs statutory declaration on closing date; draft letter of undertaking to Purchaser's lawyer;	3.00	930.00
07/24/24	ELW	Review emails from Owners; Call with Nikka Borja;	0.50	387.50
07/24/24	ELW	Group Meeting regarding closing; Review and Respond to emails with Derek Lai; Call with Jillian Sych;	1.40	1,085.00
07/24/24	LAF	Propose draft response to commercial owner re various questions;	0.40	224.00

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Date	Timekeeper	Narrative	Hours	Amount
07/25/24	LAF	Electronically sign Wills Variation Act discharges; Consider matters related to closing;	0.60	336.00
07/25/24	JAP	Meeting regarding Strata Wind-Up matters;	1.10	110.00
07/25/24	JMS	Receive and review information sheets; update data spreadsheet; review draft land title registration documents; discussion regarding closing matters and various requests for payout statements;	3.00	930.00
07/25/24	PJR	Review Marzari order on tenancy renewals; discussion with Ed Wilson on same and next steps;	0.20	155.00
07/26/24	JMS	Review trust reconciliation statement; update to include additional debits/credits; update data spreadsheet;	1.70	527.00
07/26/24	ELW	Review revised leases, review fixed term tenancy issues and court order;	0.70	542.50
07/26/24	ELW	Review Wills Variation Act Notes; Call with Jillian Sych, Review undertaking letter;	1.50	1,162.50
07/29/24	JMS	Receive and review client information sheets; update data spreadsheet; review and update interest schedule and fractional interest schedule;	2.50	775.00
07/30/24	JMS	Review reference plan; email to surveyor requesting update reference plan; obtain and review memo with comments from Vendor's lawyer; update data spreadsheet; update Vendor's statement of Adjustments and trust Reconciliation Statement; prepare word version of Owners' Agreement; telephone call to Vendor's lawyer regarding property tax certificates;	2.60	806.00
07/31/24	ELW	Call with Jillian Sych; Review and respond to emails regarding Joyce Place.	0.40	310.00
Total			63.80	27,694.00

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Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	14.80	775.00	11,470.00
JILLIAN SYCH	JMS	35.40	310.00	10,974.00
BROOKE GLOVER	BEG	2.40	245.00	588.00
LISA FREY	LAF	5.70	560.00	3,192.00
PETER ROBERTS	PJR	0.30	775.00	232.50
CHELSEA COLWILL	COC	4.10	275.00	1,127.50
JAYDA PETERSON	JAP	1.10	100.00	110.00
				$27,694.00

Taxable Other Charges

Photocopies	102.30

Non-Taxable Disbursements

LTSA Services (E)	189.20

Taxable Disbursements

Courier Services	14.56
BC Online	14.00
BC Online Service Charge	3.00
LTSA Service Charge	32.00
LTSA Services	70.02

Total Fees		**$ 27,694.00**
Disbursements and Other Charges		**$ 425.08**
Total PST BC		**$ 1,938.58**
Total GST		**$ 1,396.49**
CURRENT INVOICE DUE:	**CAD**	**$ 31,454.15**

Outstanding Prior Balance

Invoice No.	1215390	01/31/23	$	707.59
Invoice No.	1222771	03/30/23	$	8,382.47
Invoice No.	1228047	04/28/23	$	9,234.72
Invoice No.	1234598	06/23/23	$	1,437.63
Invoice No.	1242505	08/18/23	$	2,859.92
Invoice No.	1245676	09/20/23	$	4,615.49
Invoice No.	1248755	10/23/23	$	9,194.12
Invoice No.	1264704	12/31/23	$	5,710.80
Invoice No.	1268670	02/16/24	$	1,513.82

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Invoice No.	1274915	03/25/24	$	2,248.05
Invoice No.	1287222	06/24/24	$	20,230.40
Invoice No.	1289212	07/19/24	$	9,811.61

The contents of this invoice may be subject to solicitor-client privilege. Disclosure of a privileged document to a third party could constitute a waiver of privilege. We recommend that prior to voluntarily sharing the contents of this invoice or providing a copy of it to a tax auditor or other person, that you seek legal advice.

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 08/19/24
Invoice No. 1293616
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through July 31, 2024

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1293616

Total Professional Fees		27,694.00
Total Taxable Disbursements and Other Charges		235.88
Total Exempt Disbursements and Other Charges		189.20
Total BCPST		1,938.58
Total GST		1,396.49
Total Amount Due:	**CAD $**	**31,454.15**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
HSBC Bank Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 102337001
Bank ID: 016 **Transit:** 10270
Swift Code: HKBCCATT

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:

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

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

REMITTANCE

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

LAWSON LUNDELL LLP

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

Dear Valued Clients,

We are writing to inform you of an important update regarding our banking details. As a result of Royal Bank of Canada acquiring our former financial institution HSBC Canada, our new bank account information is as follows:

Institution Number: 003

Transit Number: 03215

Account Number: 1038033

Swift Code: ROYCCAT2

Royal Bank of Canada
885 West Georgia Street
Vancouver B.C., V6C 3G1

Please note that any payments made to our former HSBC bank account will be automatically re-routed to our new bank account above for the next month.

Please continue to email us at eftpmt@lawsonlundell.com referencing the invoice number and payment amount.

If you have any questions, please feel free to contact us by email at eftpmt@lawsonlundell.com

If you would like to verbally confirm our banking details, please contact **Accounts Receivable** at 604-631-9262

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 10/18/24
Invoice No. 1305063
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including September 30, 2024, as per attached detail.

Total Professional Fees		$	146,213.00
Total Taxable Disbursements and Other Charges		$	6,790.66
Total Exempt Disbursements and Other Charges		$	1,150.98
Total PST BC		$	10,234.91
Total GST		$	7,650.18
Subtotal		$	172,039.73
Less Amount Applied From Trust:		$	(172,039.73)
Current Invoice Due:	**CAD**	**$**	**0.00**

This is our account.

Lawson Lundell LLP

Per: 

Peter J. Roberts, K.C.

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 10/18/24
Invoice No. 1305063
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including September 30, 2024, as follows:

Date	Timekeeper	Narrative	Hours	Amount
06/03/24	NMB	Draft client information sheet; review purchase and sale agreement and addendum;	0.90	90.00
06/05/24	NMB	Draft memo to Intracorp; continuation of draft Form C Release of financial charges;	1.00	100.00
06/10/24	NMB	Review list of owner tenancies and absentee; update main data spreadsheet;	0.80	80.00
06/11/24	NMB	Revise memo to owners regarding sale of property and owner information and client information sheet;	0.80	80.00
06/25/24	NMB	Revise memo to owners regarding sale of property and information sheet; meeting with senior paralegal discussing delegation of tasks;	0.80	80.00
07/16/24	SHS	Translated Joyce Place - Memo to Owners re Sales of Property and Closing Information & Client Information Sheet into traditional Chinese;	4.70	940.00
08/01/24	JMS	Discussion regarding closing matters; review LTO registration documents; email to Purchaser's lawyer with updated reference plan; review and update draft statement of adjustments and trust reconciliation statement;	2.90	899.00
08/01/24	PJR	Discussion with Ed Wilson on Joyce Place residential tenancies;	0.10	77.50
08/01/24	ELW	Review and respond to email; conference with Nikka Borja;	0.50	387.50
08/02/24	ELW	Review leases regarding terms, etcetera; review schedule G; review and respond to email Crowe MacKay;	0.50	387.50

Date	Timekeeper	Narrative	Hours	Amount
08/02/24	JMS	Receive and review invoices from Liquidator; attend to reconciliation; update data spreadsheet; email to Purchaser's lawyer with spreadsheet of various deposit paid by purchaser;	1.60	496.00
08/06/24	JMS	Prepare various payout letters to property manager, city of Vancouver property taxes and accounts receivables; update data spreadsheet; discuss regarding closing matters; attending to various emails from owners' re closing matters;	2.20	682.00
08/06/24	ELW	Review memo to Owners; conference with Lisa Frey; review issue regarding commercial units; review calculation fee price adjustment;	2.40	1,860.00
08/06/24	LAF	Reply to owner regarding commercial occupancy;	0.30	168.00
08/07/24	ELW	Review statement of adjustment and trust reconciliation draft standard form; conference with Jillian Sych;	0.70	542.50
08/07/24	JMS	Receive and review property tax certificates; update data spreadsheet; review statement of adjustments and trust reconciliation statement;	2.60	806.00
08/08/24	JMS	Attending to closing matters; prepare schedule for Vendor's lawyer; discussions regarding closing documents; update vendor's statement of adjustments and trust reconciliation statement; review property tax certificates; update data spreadsheet;	3.70	1,147.00
08/08/24	PJR	Attend Joyce Place closing preparation meeting;	0.20	155.00
08/08/24	ELW	Review and respond to email; memo to D. Lai regarding rescheduled teams meeting Terra Law; group meeting;	2.00	1,550.00
08/08/24	LAF	Attend team meeting re closing; Correspondence with various owners including commercial owners regarding delivery of vacant possession on closing;	1.40	784.00
08/09/24	LAF	Reminder correspondence with outstanding owners to submit owner information form;	0.30	168.00
08/09/24	PJR	Email form J. Carter on COV criminal matter on Joyce place; draft reply email and discuss with D. Lai; emails form and call with T. Takagaki on same; email to J. Carter on issue;	0.60	465.00

Date	Timekeeper	Narrative	Hours	Amount
08/09/24	NMB	Email to lawyer providing client info sheet; email to owner confirming receipt of mortgage number; email to owner requesting confirmation of declaration of empty home tax;	3.50	350.00
08/09/24	JMS	Update data spreadsheet; receive and review owner information sheets; update data spreadsheet; emails to owners; emails to Purchaser's lawyer with spreadsheet and list of existing financials;	2.10	651.00
08/09/24	ELW	Memo to D. Lai regarding lease, etcetera; memo to Dwell; review and respond to email regarding city order; review and respond to email D. Lai;	0.70	542.50
08/12/24	JMS	Draft email to owners regarding appointments and closing documents; draft instructions for execution of closing documents; update financial charge schedule; email to Purchaser's lawyer regarding adjustments and updating spreadsheet;	2.10	651.00
08/12/24	ELW	Review and respond to email D. Lai and J. Carter at Terra Law; conference with Jillian Sych;	0.50	387.50
08/12/24	JAP	Attend to delivery of payout statement requests;	1.40	140.00
08/13/24	JAP	Continue handling delivery of letter payout statement requests; prepare FCT payout statement requests; draft AtSource payout statement requests; provide update regarding status of the 63 payout statement requests;	5.10	510.00
08/13/24	LAF	Consider matters related to square footage versus unit entitlement; Email to owner re same; Email to purchaser counsel regarding commercial owner request to remain in unit after closing date;	0.70	392.00
08/13/24	JMS	Discussions regarding various closing matters; obtain updated property tax certificate for strata lot 46; draft email to Terra Law regarding closing items; update data spreadsheet; finalize Directions to Pay;	1.80	558.00
08/13/24	ELW	Meeting with Derek Lai, review lead issues. Talk to Terra law regarding leases;	1.50	1,162.50

Date	Timekeeper	Narrative	Hours	Amount
08/14/24	LAF	Various correspondence with owners re owner information sheet and other pre-closing matters; Correspondence with purchaser counsel relaying information re commercial unit occupancy after closing; Email to property manager regarding various closing and post-closing matters;	1.60	896.00
08/14/24	ELW	Review and respond to email Terra Law and D. Lai regarding issues; review and respond to email IntraCorp; draft price adjustment memo;	4.00	3,100.00
08/15/24	LAF	Review schedule regarding purchase price adjustment; Consider value adjustment date; Email to E. Wilson re same;	1.10	616.00
08/15/24	JMS	Update data spreadsheet; email to Purchaser's lawyer with requested information and update adjustment spreadsheet; discussion regarding closing matter; prepare schedule of allocated adjusted purchase price;	2.80	868.00
08/15/24	ELW	Meeting with Terra law regarding property transfer tax adjustment., Meeting with Joyce place owners;	3.00	2,325.00
08/16/24	JMS	Email to Vendor's lawyers with updated adjustments; receive and review draft Vendor's statement of Adjustments; provide form of Owner's Certificate to Vendor's lawyer for review/comments; update data spreadsheet; update list of closing documents;	2.70	837.00
08/16/24	LAF	Email from agents re proposed closing approach; Review purchase agreement and email to E. Wilson re same;	0.50	280.00
08/16/24	ELW	Review and respond to emails;	1.00	775.00
08/19/24	LAF	Review draft closing documents; Provide comments on same;	0.50	280.00
08/19/24	ELW	Review and respond to emails regarding execution of documents, review and revise proposal;	1.60	1,240.00
08/19/24	PJR	Emails with D. Lai on COV charges and Intracorp concerns;	0.30	232.50
08/19/24	JMS	Draft email to owners with status update; receive and review various mortgage payout statements; update data spreadsheet;	2.70	837.00

Date	Timekeeper	Narrative	Hours	Amount
08/20/24	PJR	Review Sched G price increase issue and J. Carter email; discussion with Ed Wilson and Lisa Frey on same; review Marzari judgment on issue of Intracorp knowledge of Joyce Place condition;	1.50	1,162.50
08/20/24	JMS	Receive and review mortgage payout statements; update data spreadsheet; finalize and prepare vendor's statements of adjustments for execution; provided amended Owners Certificate to Purchaser's lawyer for review and comments; update payout letters; discussions regarding closing matters;	3.70	1,147.00
08/20/24	ELW	Review file; review court decision regarding repairs; conference with Peter Roberts ; review and respond to email;	2.00	1,550.00
08/21/24	JAP	Follow up on payout statement requests; rearrange delivery of payout request to Ministry of BC;	0.70	70.00
08/21/24	ELW	Memo to Terra Law regarding purchase prices adjustment; review letter; review contract; review and respond to email Terra Law;	2.00	1,550.00
08/21/24	SAL1	Discussions with Peter Roberts regarding arbitration clause and potential appeal issues, and review of PSA and draft email regarding arbitration;	1.00	575.00
08/21/24	PJR	Review PSA and Sched G price adjustment; review and revise draft price adjustment arbitration proposal; discussion with Scott Lucyk on arbitration issues; email to Ed Wilson, Lisa Frey and D. Lai on same;	1.10	852.50
08/21/24	JMS	Attending to various closing matters; emails to Vendor's lawyer; receive and review Owner's Certificates; prepare owner's certificates for the non-resident owners;	2.50	775.00
08/22/24	SAL1	Drafting arbitration clause and email regarding same, and related review of VanIAC arbitration discussions with Peter Roberts regarding arbitration clause and potential appeal issues, and review of PSA and draft email regarding arbitration;	1.90	1,092.50

Date	Timekeeper	Narrative	Hours	Amount
08/22/24	JMS	Receive and review various mortgage payout statements; update data spreadsheet; receive and review updated vendor's statement of adjustments from Vendor's lawyer; update Vendor's Statement of Adjustments for SL 11; receive and review Owner's Agreement from Vendor's lawyer; discussions regarding various closing matters;	3.40	1,054.00
08/22/24	PJR	Call with D. Lai on Intracorp repair and imposing limit; review and revise draft Purchase Price Adjustment terms; discussion with Ed Wilson and Scott Lucyk on same;	0.60	465.00
08/22/24	LAF	Correspondence with commercial owners re leases; Various other correspondence re closing including with property management team to finalize figures for trust reconciliation; Team meeting in preparation for same;	1.90	1,064.00
08/22/24	ELW	Review notice to owners; review VSA and hold back; conference with Jillian Sych; draft letter to Terra Law;	3.00	2,325.00
08/22/24	JAP	Request payout statement from Vancity; call Blueshore regarding payout statement timeframe; obtain updated titles; call National Bank of Canada; request payout statements from FCT; arrange delivery for payout requests to CIBC and NBC; meeting regarding closing matters;	2.90	290.00
08/23/24	NMB	Email to all owners regarding update of on the progress of the sale; email to and from owner queries; email to S. Eng regarding mailing out status update of file;	4.10	410.00
08/23/24	PJR	Review and revise draft email to Joyce Place owners on closing; call from and email with D. Lai on owners repair obligation; call with H. Buck, J. Darling, D. Lai and T. Takagaki on Intracorp repair issues;	0.60	465.00
08/23/24	JMS	Review draft status update email to owners; receive and review mortgage payout statement; update data spreadsheets; email from owners regarding closing information;	0.80	248.00
08/23/24	LAF	Prepare response to certain owners regarding questions;	1.50	840.00
08/23/24	ELW	Conference call regarding building and closing issues; review and respond to email Terra Law;	1.70	1,317.50

Date	Timekeeper	Narrative	Hours	Amount
08/26/24	JMS	Receive and review mortgage payout statements; email with property manager regarding amount of release of special levies; update data spreadsheet; update trust reconciliation statement; attend to various closing matters;	2.90	899.00
08/26/24	ELW	Review file; telephone to Terra Law; memo to File; review and respond to email; conference with Jillian Sych regarding statement of adjustments; review and respond to email;	1.30	1,007.50
08/26/24	NMB	Telephone call with various lenders requesting status of payout statements; email to various owners regarding mortgage reference no's; email to lawyer regarding various owner queries; draft email to owners regarding closing documents; prepare owner closing documents package;	4.60	460.00
08/27/24	NMB	Email to D. Lai providing email from 3376 allowing access to unit; email to lawyer providing further owner queries; organize vendor closing documents; email to owners providing closing documents;	6.30	630.00
08/27/24	JAP	Consider correspondence from the Ministry of Finance regarding payout of liens; email regarding same;	0.20	20.00
08/27/24	KPW	Prepare delivery slips for packages delivery;	0.20	20.00
08/27/24	PJR	Call with Hart Buck, T. Takagaki and D. Lai on Purchase Price Adjustment and warranty claims by Intracorp;	0.50	387.50
08/27/24	JMS	Receiving and reviewing mortgage payout statements; update data spreadsheet; email to property manager regarding release of special levy funds prior to closing date; finalize trust reconciliation statements and vendor closing documents; prepare vendor closing documents packages for mail out to owners; discussions regarding closing matters;	4.30	1,333.00
08/27/24	LAF	Various preparations for upcoming closing; Meet with associates re sign up appointments;	4.50	2,520.00
08/27/24	NLF	Discuss Strata Sign up package with Lisa Frey;	1.00	430.00
08/27/24	ELW	Telephone to regarding closing issues;	2.00	1,550.00

Date	Timekeeper	Narrative	Hours	Amount
08/28/24	PJR	Emails with various people on warranty defects for elevator and boiler;	0.10	77.50
08/28/24	JMS	Receive and review numerous mortgage payout statements; emails to various owners regarding closing matters and questions related thereto; attending to various closing matters;	4.30	1,333.00
08/28/24	LAF	Attending on-site signing appointments;	9.20	5,152.00
08/28/24	NLF	Attend Strata signups at Joyce Place;	3.00	1,290.00
08/28/24	ELW	Review and respond to email regarding building issues; owner sign up vendor documents;	2.00	1,550.00
08/28/24	JAP	Follow up on outstanding payout statements; telephone calls to NBC regarding payout statement; email NBC re-requesting payout statements; call First National; update FCT payout statement requests; provide update on outstanding items;	2.10	210.00
08/29/24	JAP	Follow up on 9 RBC payout statement requests; call Scotiabank; email NBC regarding payout statement; call Ministry of Finance; discuss payout statement with NBC; email Ministry of Finance; call Ministry of Finance; consider payout letters from Ministry of Finance;	1.80	180.00
08/29/24	JMS	Receive and review various signed owner closing documents packages; receive and review mortgage payout statements; update data spreadsheet; email to owners; discussions regarding closing matters;	4.60	1,426.00
08/29/24	PJR	Review emails and discuss with Ed Wilson Intracorp response to arbitration issues;	0.20	155.00
08/29/24	BAW1	Attend to wind-up signing at Joyce Place;	6.00	2,700.00
08/29/24	SKK	Conference with Lisa Frey and Ben Westerterp regarding strata sign ups; sign up strata lot owners;	6.70	1,842.50
08/29/24	LAF	Attend and coordinate various on-site owner signups; Emails to and from property manager; Correspondence with purchaser counsel, counsel for owners with builder's lien; Attend client videoconference regarding closing arrangements;	7.30	4,088.00
08/29/24	NLF	Draft email regarding rent-back for unit;	0.20	86.00

Date	Timekeeper	Narrative	Hours	Amount
08/29/24	ELW	Review and respond to emails. review and revise closing agenda, emails re settlement of issues;	4.00	3,100.00
08/30/24	NJG	Review mortgage payout calculations and requirements for certified funds for all mortgaged lots;	0.50	137.50
08/30/24	JMS	Prepare letters to lenders enclosing payout and discharges; receive and review signed closing documents; various emails to owners regarding closing matters; prepare payout schedule; attending to various closing matters;	4.60	1,426.00
08/30/24	LAF	Attend to multiple signing appointment video call and phone call regarding owner packages; Email to Intracorp counsel re closing proposal; Correspondence with Crown regarding SVT holdback;	4.10	2,296.00
08/30/24	PJR	Review emails on closing issues and Intracorp;	0.20	155.00
08/30/24	NMB	Email to Lisa Frey providing schedule to telephone and zoom call with owners; email to Jillian Sych providing receipt BNS payout statement; email to owners confirming receipt of signed vendor closing documents; email to owners responding to queries; email to Unit 1103 providing update trust reconciliation; email to owners following-up on signed closing documents and to providing evidence of damages to unit;	6.00	600.00
08/31/24	LAF	Reply to owner enquiry regarding closing mechanics with tenant;	0.30	168.00
08/31/24	ELW	Review and respond to emails;	1.00	775.00
09/02/24	ELW	Review and respond to emails;	0.50	387.50
09/02/24	LAF	Preparations for upcoming closings;	2.80	1,568.00
09/03/24	KPW	Telephone call with National Bank regarding payout statement;	0.30	30.00
09/03/24	JMS	Receive and review signed owner closing documents; receive and review various mortgage payout statements; update data spreadsheet; prepare lender payout letters; attending to various closing matters; emails with owners regarding closing matters;	5.50	1,705.00

Date	Timekeeper	Narrative	Hours	Amount
09/03/24	PJR	Review emails on fire panel issue and Intracorp position	0.10	77.50
09/03/24	ELW	Review and respond to emails;	0.80	620.00
09/03/24	LAF	Various preparations for closing including emails and calls with owners; Communications with purchaser's counsel; Review closing documents;	3.80	2,128.00
09/04/24	KPW	Telephone call with National Bank following up on payout statement;	0.10	10.00
09/04/24	PJR	Review emails on Intracorp extension request; draft speaking notes; discussion with Lisa Frey; call with C. Lee and J Carter of Terra Law; call with D. Lai; review and revise message to Dwell and strata; call form D. Lai on townhouse issues; emails with C. Lee and review of outstanding issues; email to C. Lee on same; letter from and email to J. Cytranbaum; reporting email n same to D. Lai; emails with R. Mahil on elevator; call with H. Buck on Intracorp. positions; Return telephone call to D. Lai; email from Lisa Frey and review Intracorp. mutual undertakings and Assignment of Development Assignment;	3.40	2,635.00
09/04/24	JMS	Receive and review various mortgage payout statements; update data spreadsheet; email to purchaser's lawyer to obtain purchaser's property manager contact; update reporting letter to owners and provide drafts for review; email to Dwell Property to obtain status of release of special levy funds; attending to closing matters;	2.80	868.00
09/04/24	ELW	Review and respond to emails;	0.40	310.00
09/04/24	LAF	Teleconference with purchaser counsel regarding alleged breaches of PSA; Various correspondence with owners regarding upcoming closing; Various Zoom meetings and telephone calls with owners with queries; Email to Ministry regarding liens;	3.70	2,072.00
09/05/24	JMS	Prepare letters to lenders enclosing payout and discharge; receive and review signed vendor documents; update data spreadsheet; attend to closing matters; prepare payout schedules; prepare closing documents for execution by Liquidator and Strata Corporation;	4.40	1,364.00

Date	Timekeeper	Narrative	Hours	Amount
09/05/24	PJR	Call from H. Buck; emails and calls with C. Lee and J. Carter on various issues; emails with J. Cytranbaum; calls with D. Lai, T. Takagaki and Lisa Frey on Intracorp proposals and response to them; draft letter to J. Cytranbaum; emails with J. Cytranbaum;	3.40	2,635.00
09/05/24	ELW	Review and respond to emails;	0.50	387.50
09/05/24	LAF	Review and revise draft closing documents; Email to purchaser's counsel re same; Various correspondence with client and property management company regarding pre-closing matters; Email to lawyer for commercial owner regarding lease; Review and finalize counsel closing documents and deliver to strata council for execution; Numerous emails with owners regarding closing arrangements; Attempt to locate owners who have not yet returned closing package; Confirm discharge of Speculation and Vacancy Tax liens with Ministry of Finance in respect of multiple units;	4.30	2,408.00
09/06/24	NJG	Review mortgage payout statements and verify calculations;	0.30	82.50
09/06/24	PJR	Review emails from J. Cytranbaum and Terra Law; discussion with Lisa Frey on closing issues;	0.50	387.50
09/06/24	JMS	Prepare reporting letters; attending to various closing matters; receive and review letter of undertaking receive and review signed Owners' agreements from purchaser; email to purchaser's lawyer with sign vendor's owners' agreements and copies of certified order and letter to registrar; receive and review signed liquidator documents; prepare for closing;	4.50	1,395.00
09/06/24	ELW	Review and respond to emails;	0.60	465.00
09/06/24	LAF	Attend to various pre-closing matters; Update to owner from liquidator; Signing appointment with liquidator re closing documents; Various discussions with litigation team regarding reserving rights for strata owners with respect to purchase price adjustment and density bonus; Various correspondence with liquidator and property manager regarding sufficient operating and CRF funds; JuriCert; Team meeting re closing;	4.20	2,352.00

Date	Timekeeper	Narrative	Hours	Amount
09/07/24	PJR	Review fire panel emails; email from and to C. Lee on same; call with Lisa Frey on fire panel and townhouse issues; email to D. Lai on disclosure of reports;	0.40	310.00
09/07/24	PJR	Call with D.Lai and Lisa Frey on Intracorp litigation threats and CRF	1.00	775.00
09/07/24	ELW	Review and respond to emails;	0.40	310.00
09/07/24	LAF	Email to owner's lawyer re bridge financing; Teleconference with P. Roberts and client re next steps; Emails to tenant in arrears; Various correspondence with owners regarding fire alarm testing;	2.10	1,176.00
09/08/24	NMB	Email to B. Muk to obtain signature for the certified resolution of SGM Notice of Strata Corporation;	0.80	80.00
09/08/24	ELW	Review and respond to emails;	1.50	1,162.50
09/08/24	LAF	Emails to counsel re execution of strata resolutions;	0.10	56.00
09/09/24	JMS	Update data spreadsheet regarding additional holdback of special levy funds; prepare updated trust reconciliation statements; prepare reporting letters to owners; compile reporting packages; prepare and forward letter to Purchaser's lawyer with signed vendor closing documents; prepare and attend to registration of reference plan, court order and related documents; prepare for payouts to lenders and owners;	6.70	2,077.00
09/09/24	PJR	Review Community Fire Prevention inspection report; call to Matt Sprunt on same; email; to C. Lee with inspection report; review Intracorp claim, application and supporting affidavits; draft responsive affidavits; call with D. Lai on application; prepare application response; emails and discussions with R. Mallit; attend court for application hearing; reporting email to D. Lai; emails and calls with H. Buc; review and revise draft email to owners; discussions with Lisa Frey on same;	5.10	3,952.50
09/09/24	ELW	Review and respond to emails;	1.50	1,162.50

Date	Timekeeper	Narrative	Hours	Amount
09/09/24	LAF	Attend to various closing day matters; Finalize undertaking letter; Attend to electronic execution of closing documents; Various correspondence with Purchaser's lawyer; Review with litigation team in relation to emergency application; Report emails to client;	5.80	3,248.00
09/10/24	JMS	Attend to payouts to all lenders; attending to reporting packages and payouts to all owners; attend to payout of outstanding property taxes, strata fees and liquidator invoices;	5.90	1,829.00
09/10/24	PJR	Email to D. Lai on entered order; consider and draft notice of application for directions and leave;	0.30	232.50
09/10/24	LAF	Report to client re funds; Sign various documents regarding post-closing payouts;	0.60	336.00
09/11/24	PJR	Draft notice of application for directions; draft supporting affidavit; review materials; discussions and emails with Lisa Frey on same; email to D. Lai on same;	4.30	3,332.50
09/11/24	JMS	Emails and telephone calls to various lenders regarding legal description on Form C Release of Mortgage; email to owners' notaries regarding sale proceeds available for pick up;	0.90	279.00
09/11/24	ELW	Review and respond to emails;	0.20	155.00
09/11/24	LAF	Review affidavit of D. Lai; Prepare attachments re same; Emails to counsel for owners completing purchases in near future; Discussion with S. Kaura re purchase price adjustment calculations; Emails to Purchaser counsel and representative re key arrangements; Answer various owner inquiries;	3.60	2,016.00
09/12/24	JMS	Discussions regarding post closing matters; telephone and email from lender regarding Form C releases;	0.50	155.00
09/12/24	PJR	Draft revisions to www.joyceplacestrata.com for current updates; emails and calls with D. Lai on application and Intracorp claim; review and revise application and affidavit material; discussions with Lisa Frey; draft Response to Civil Claim for Intracorp claim; prepare for and attend court application on service; attend registry for order entry; emails with L. Goldberg; revise website and instructions on service;	5.20	4,030.00

Date	Timekeeper	Narrative	Hours	Amount
09/12/24	ELW	Review and respond to emails;	0.20	155.00
09/12/24	LAF	Various preparations to assist with application regarding liquidator standing to advance claims of strata corporation; Attend building to deliver cheques and answer owner inquiries; Various correspondence and in-person cheque pickup meetings with owners re reporting and questions; Update website text;	4.10	2,296.00
09/13/24	PJR	Revise Joyce Place website; emails with B. Muk on Liquidator's Application;	0.30	232.50
09/13/24	NMB	Respond to email from owners regarding cheques to be picked up from delivery services; email to lawyer providing queries from owners regarding liquidator application; email to owner regarding payout to lender queries; email to lawyer providing tenant contact information;	3.50	350.00
09/13/24	ELW	Review and respond to emails;	0.20	155.00
09/13/24	LAF	Attend to various post-closing matters; Various explanatory emails to owners;	2.80	1,568.00
09/16/24	ELW	Review and respond to emails;	0.30	232.50
09/16/24	SKK	Review strata developments for comparable development changes;	3.60	990.00
09/16/24	LAF	Attend to various post-closing matters; Report letter to international owners; Discussion with S. Kaura re property comparables research;	1.80	1,008.00
09/17/24	PJR	Letter to R. Mittal on no steps in default; telephone call to D. Lai on RDH evidence, owner responses and next steps; review owner responses; email to Janet Chiang; instructions to Nikka Borja; email with T. Takagaki on RDH;	0.60	465.00
09/17/24	ELW	Review and respond to emails regarding closing issues;	0.40	310.00
09/17/24	SKK	Review strata developments for comparable development changes;	1.30	357.50
09/17/24	LAF	Email to purchaser counsel re tenant eviction	0.20	112.00
09/18/24	ELW	Call with N. Borja regarding defect advice;	0.30	232.50

Date	Timekeeper	Narrative	Hours	Amount
09/19/24	PJR	Review emails between P. Good (RDH) and T. Takagaki on inspections; telephone to T. Takagaki and P. good on same; email to P. Good on nature of inspection;	0.40	310.00
09/19/24	SKK	Review strata developments for comparable development changes;	0.40	110.00
09/19/24	ELW	Review and respond to email; review LTO issues;	0.30	232.50
09/20/24	LAF	Coordinate key transfer; Email to purchaser;	0.10	56.00
09/23/24	PJR	Email to L. Goldberg (RBC counsel) on RBC mortgages and discharge issues;	0.10	77.50
09/23/24	LAF	Correspondence regarding RBC discharges;	0.30	168.00
09/25/24	LAF	Update website text to confirm notice of registration; Email from purchaser counsel re occupants;	0.40	224.00
09/26/24	PJR	Call with Paul Good (RDH), D. Lai and T. Takagaki on townhouses condition;	0.60	465.00
09/26/24	ELW	Group meeting regarding post closing issues regarding timeline and tenants;	0.40	310.00
09/27/24	LAF	Email to former owner re occupants;	0.30	168.00
09/27/24	ELW	Review and respond to emails regarding 606;	0.30	232.50
Total			322.10	146,213.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
BEN WESTERTERP	BAW1	6.00	450.00	2,700.00
ED WILSON	ELW	46.20	775.00	35,805.00
JAYDA PETERSON	JAP	14.20	100.00	1,420.00
JILLIAN SYCH	JMS	89.50	310.00	27,745.00
KRYSTAL WONG	KPW	0.60	100.00	60.00
LISA FREY	LAF	76.20	560.00	42,672.00
NAOMI GRIFFIN	NJG	0.80	275.00	220.00
NATASHA FORD	NLF	4.20	430.00	1,806.00
NIKKA BORJA	NMB	33.10	100.00	3,310.00
PETER ROBERTS	PJR	31.70	775.00	24,567.50
SCOTT LUCYK	SAL1	2.90	575.00	1,667.50
SONAL KAURA	SKK	12.00	275.00	3,300.00
SYLVIA SUN	SHS	4.70	200.00	940.00
				$146,213.00

Taxable Other Charges

Photocopies	3,821.70
Colour Photocopies	2.00

Non-Taxable Disbursements

MERCHANT: Vancouver Supreme Court, Date: 9/12/2024, Notice of Application filing	80.00
Mastercard Charge - VAN (E) - Atsource LS88FF6X7Y-A1 - KF MC SEP 27/2024	65.16
Mastercard Charge - VAN (E) - Atsource LSGXWWKV4P-A1 - KF MC SEP 27/2024	32.65
Mastercard Charge - VAN (E) - Atsource LSNMXY6Y3V-A1 - KF MC SEP 27/2024	32.65
LTSA Services (E)	940.52

Taxable Disbursements

Vendor: LYON & PHILLIPS LAND SURVEYING LTD.; Invoice#: 2147078; Date: 7/2/2024 - Lyon & Phillips Land Surveying Ltd Invoice 2147078 ELW/TLM	2,475.00
Mastercard Charge - Vancouver - Atsource LS88FF6X7Y-A1 - KF MC SEP 27/2024	77.50
Mastercard Charge - Vancouver - Atsource LSGXWWKV4P-A1 - KF MC SEP 27/2024	75.50
Mastercard Charge - Vancouver - Atsource LSNMXY6Y3V-A1 - KF MC SEP 27/2024	75.50
Courier Services	121.95
BC Online	14.00
BC Online Service Charge	3.00
LTSA Service Charge	82.00
LTSA Services	42.51

Total Fees		**$**	**146,213.00**
Disbursements and Other Charges		**$**	**7,941.64**
Total PST BC		**$**	**10,234.91**
Total GST		**$**	**7,650.18**
Subtotal		**$**	**172,039.73**
Less Amount Applied From Trust:		**$**	**(172,039.73)**
CURRENT INVOICE DUE:	**CAD**	**$**	**0.00**

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 10/18/24
Invoice No. 1305063
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through September 30, 2024

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1305063

Total Professional Fees		146,213.00
Total Taxable Disbursements and Other Charges		6,790.66
Total Exempt Disbursements and Other Charges		1,150.98
Total BCPST		10,234.91
Total GST		7,650.18
Subtotal		172,039.73
Less Amount Applied From Trust:		(172,039.73)
Total Amount Due:	**CAD $**	**0.00**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
Royal Bank of Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 1038033
Bank ID: 003 **Transit:** 03215
Swift Code: ROYCCAT2

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:
Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

REMITTANCE

LAWSON LUNDELL LLP

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

Dear Valued Clients,

We are writing to inform you of an important update regarding our banking details. As a result of Royal Bank of Canada acquiring our former financial institution HSBC Canada, our new bank account information is as follows:

Institution Number: 003

Transit Number: 03215

Account Number: 1038033

Swift Code: ROYCCAT2

Royal Bank of Canada
885 West Georgia Street
Vancouver B.C., V6C 3G1

Please note that any payments made to our former HSBC bank account will be automatically re-routed to our new bank account above for the next month.

Please continue to email us at eftpmt@lawsonlundell.com referencing the invoice number and payment amount.

If you have any questions, please feel free to contact us by email at eftpmt@lawsonlundell.com

If you would like to verbally confirm our banking details, please contact **Accounts Receivable** at 604-631-9262

The contents of this invoice may be subject to solicitor-client privilege. Disclosure of a privileged document to a third party could constitute a waiver of privilege. We recommend that prior to voluntarily sharing the contents of this invoice or providing a copy of it to a tax auditor or other person, that you seek legal advice.

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 12/16/24
Invoice No. 1314167
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including November 30, 2024, as per attached detail.

Total Professional Fees		$	42,987.00
Total Taxable Disbursements and Other Charges		$	925.17
Total Exempt Disbursements and Other Charges		$	829.10
Total PST BC		$	3,009.09
Total GST		$	2,195.61
Current Invoice Due:	**CAD**	**$**	**49,945.97**

This is our account.

Lawson Lundell LLP

Per: 

Peter J. Roberts, K.C.

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 12/16/24
Invoice No. 1314167
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including November 30, 2024, as follows:

Date	Timekeeper	Narrative	Hours	Amount
10/01/24	KPW	Search for documents in the file;	0.20	20.00
10/01/24	PJR	Review file and draft Affidavit #3 of A. Cheng for service; discussions with Lisa Frey on same; email to D. Clements at COV on provincial prosecution of work order matters; review and revise application record index;	1.20	930.00
10/01/24	ELW	Review and respond to emails regarding Price Adjustment; Telephone call to H. Bech; Review leases;	0.50	387.50
10/01/24	JAP	Attend to parcel activity notifier; confirm notice of application delivery;	0.40	40.00
10/01/24	LAF	Provide additional information in support of application; Various correspondence with owners re update;	1.20	672.00
10/02/24	LAF	Coordinate inquiries to CRA re holdbacks;	0.30	168.00
10/02/24	ELW	Review and respond to emails regarding Section 116;;	0.30	232.50
10/02/24	MW1	Respond to email on withholding taxes;	0.30	175.50
10/02/24	PJR	Review and revise application record and brief of authorities; review and revise draft order;	0.50	387.50
10/03/24	KEB2	Call CRA to confirm current practice regarding comfort letters for Lisa Frey;	0.70	192.50
10/04/24	KEB2	Telephone call with the CRA to confirm CRA's practice for Lisa Frey; send correspondence to same with results;	1.20	330.00

Date	Timekeeper	Narrative	Hours	Amount
10/04/24	PJR	Prepare for and attend Liquidator's Application for Directions before Justice Francis; attend to order entry; update Joyce Place website; reporting email to D. Lai; instructions to Sarah Hannigan on Intracorp defence and counterclaim;	4.00	3,100.00
10/04/24	ELW	Review and respond to emails;	0.30	232.50
10/04/24	LAF	Correspondence re unauthorized occupants;	0.50	280.00
10/07/24	LAF	Correspondence with purchaser counsel regarding unit with occupants;	0.60	336.00
10/07/24	ELW	Call with Peter Roberts;	0.30	232.50
10/09/24	ELW	Review and respond to emails; Call with Lisa Frey;	0.40	310.00
10/10/24	ELW	Review and respond to emails; Call with Lisa Frey;	0.30	232.50
10/10/24	JMS	Review file; receive and review various filed releases; email to accountants regarding status of clearance certificates for non-resident owners;	0.80	248.00
10/10/24	LAF	Email to purchaser counsel re moveouts and other post-closing matters;	0.30	168.00
10/11/24	LAF	Email to owners and purchaser counsel re move out protocol;	0.20	112.00
10/11/24	JMS	Receive and review signed TD Bank Release; prepare releases for registration; update data spreadsheet; arrange for pick up of balance of CRF and Operating Funds from Dwell Property Management;	2.10	651.00
10/11/24	PJR	Review email and report from P. Good of RDH; call with and email to T. Takagaki on same; call to P. Good on need for building condition descriptions over time; call form P. Good on evidence; instructions to Jordan Hayward on RDH evidence review;	1.10	852.50
10/11/24	ELW	Review and respond to emails with T. Takagaki and C. Lee regarding move out;	0.50	387.50
10/15/24	JMS	Attend to registration of various releases of mortgages; receive and attend to deposit of cheques from property manager re balance of CRF funds and OP Funds;	1.90	589.00

Date	Timekeeper	Narrative	Hours	Amount
10/15/24	PJR	Emails with Lisa Frey on draft email to owner on renting unit;	0.10	77.50
10/15/24	ELW	Call with Jillian Sych; Review financials;	0.50	387.50
10/15/24	JAP	True up Form C Releases for SL 30 and SL 60; attend to parcel activity notifiers;	0.60	60.00
10/17/24	LAF	Email to owner re move out procedure;	0.20	112.00
10/17/24	JAP	Consider parcel activity notifiers; obtain charge releases; update discharge spreadsheet; provide update on discharges;	2.60	260.00
10/17/24	JMS	Receive and review outstanding invoices received from Dwell Property Manager; prepare and forward letter and cheque to Community Fire in payment of outstanding invoices; update schedule of filed releases; discussion regarding release of security documents to owners who have vacated units;	1.30	403.00
10/18/24	JMS	Draft form of release for Delayed Possession Holdbacks; telephone call to CRA to obtain status of clearance certificates for SL 32 and 40; telephone call from Unit 701 owner regarding landlord's agent contact information; email to lender with update title search and request for copy of filed release of mortgage;	1.50	465.00
10/18/24	LAF	Review and e-sign mortgage releases;	0.40	224.00
10/18/24	JAP	Correspond regarding releases for SL 30 and 60; revise Form Cs with post-consolidated PID; provide lawyer with web-filing link for review and e-signature;	0.70	70.00
10/21/24	JAP	Attend to e-filing Form C Releases for SL 30 and 60; update discharge spreadsheet; provide discharge status update;	0.90	90.00
10/21/24	PJR	Review inspection proposal form Paul Good of RDH; emails with T. Takagaki on same; email and call with D. Lai; call to R. Mittal on access for RDH; email to P. Good;	0.50	387.50
10/21/24	LAF	Consider issues pertaining to non-resident holdbacks;	0.40	224.00
10/22/24	PJR	Return telephone call from R. Mittal on townhouse access for RDH;	0.10	77.50

Date	Timekeeper	Narrative	Hours	Amount
10/24/24	PJR	Emails with P. Good and T. Takagaki on RDH inspection;	0.10	77.50
10/24/24	JMS	Attending to releases of mortgages; update spreadsheet; discussions regarding deposit release authorization;	0.50	155.00
10/25/24	JMS	Review file; email to accounts for SL 32 and 40 regarding status of CRA comfort letters/clearance certificates;	0.70	217.00
10/25/24	ELW	Call with Lisa Frey and Jillian Sych;	0.30	232.50
10/25/24	LAF	Email to purchaser counsel re non-resident clearance letter status;	0.30	168.00
10/25/24	SBH	Review application record; draft response to civil claim;	1.20	576.00
10/28/24	PJR	Discussion with and instructions to Sarah Hannigan on drafting defence and counterclaim to Intracorp.;	0.20	155.00
10/28/24	JKH	Draft table of inspection report findings;	3.40	1,326.00
10/28/24	ELW	Review and Respond to Emails;	0.30	232.50
10/29/24	LAF	Various correspondence re non-resident holdbacks;	0.40	224.00
10/29/24	ELW	Call with Jillian Sych and Lisa Frey;	0.30	232.50
10/29/24	ELW	Review and Respond to Email regarding litigation;	0.30	232.50
10/30/24	PJR	Call from Hart Buck on Intracorp on comparables;	0.10	77.50
10/30/24	SBH	Draft response to civil claim; emails with Ed Wilson regarding outstanding details;	3.40	1,632.00
10/30/24	LAF	Various correspondence with non-resident owners, accountants and purchaser's counsel re remittance of holdback funds to CRA;	1.40	784.00
10/31/24	NMB	Meeting with lawyer and senior paralegal re deposit refund process; telephone call and email with RBC, First National and National Bank following up on Discharges;	2.00	200.00
10/31/24	JMS	Discussions re release of delayed possession deposits;	1.30	403.00

Date	Timekeeper	Narrative	Hours	Amount
10/31/24	SBH	Draft response to civil claim; call with Ed Wilson regarding details of claim;	4.00	1,920.00
10/31/24	LAF	Consider issues to do with owners agreement deposit release payouts; Correspondence with purchaser counsel;	0.90	504.00
10/31/24	ELW	Review and Respond to Email; Team meeting; Call with Sarah Hannigan;	0.80	620.00
11/01/24	PJR	Review Affidavit #1 of B. Muk; review wind-up history and review and revise draft response to civil claim and counterclaim; discussion with D. Lai on same; telephone call to D. Clements at COV prosecutions;	3.60	2,790.00
11/01/24	JMS	Draft form of letter to owners release mortgage holdbacks; update data spreadsheet;	0.80	248.00
11/01/24	SBH	Draft counterclaim; finalize and arrange for filing of response to civil claim and counterclaim; calls and discussions with Peter Roberts regarding same;	2.20	1,056.00
11/01/24	NMB	Email to trust providing payout letter on release of security deposit; email to owner providing copies of the same; provide AtSource receipts to Accounting; meeting with lawyer and paralegal regarding progress of file;	1.60	160.00
11/04/24	PJR	Return telephone call from and email from B. Dumanowsky at COV on Joyce Place prosecution; emails with J. Cytrynbaum and R. Mittal on Liquidator response and property inspection;	0.20	155.00
11/04/24	NMB	Email to and from owner providing property manager information;	0.80	80.00
11/05/24	ELW	Review and respond to emails; Call with Lisa Frey;	0.30	232.50
11/05/24	NMB	Prepare payout letter releasing delayed possession holdback; obtain lawyer signature of the same;	1.00	100.00
11/05/24	LAF	Correspondence re release of deposit - multiple units; Correspondence with representatives for non-resident owners regarding remittance to CRA: Email to purchaser counsel regarding move out procedure;	1.10	616.00
11/06/24	LAF	Correspondence re release of deposit - multiple units;	0.20	112.00

Date	Timekeeper	Narrative	Hours	Amount
11/06/24	NMB	Prepare letter to owners enclosing release of mortgage holdbacks; email to lawyer confirming move out date for owners; prepare payout letter of the same; email to owner confirming cheque pick up;	3.10	310.00
11/06/24	JMS	Prepare letters to owners enclosing release of mortgage holdbacks; prepare payout schedule for releases of holdbacks;	1.00	310.00
11/07/24	LAF	Email to owner re application of tenancy law;	0.20	112.00
11/08/24	JMS	Review status of various releases of financial charges; email to purchaser's lawyer with list of discharge particulars for the various financial charges;	0.40	124.00
11/12/24	JMS	Receive and review discharge particulars; update spreadsheet;	0.40	124.00
11/13/24	PJR	Return telephone call to D. Clements at COV on prosecution;	0.10	77.50
11/13/24	JKH	Review inspection reports; prepare table of findings;	5.00	1,950.00
11/13/24	NMB	Telephone call and email with National Bank obtaining status of discharges; prepare further payout letter releasing security deposit;	1.40	140.00
11/13/24	LAF	Correspondence re non-resident owner; Confirm move out with property manager;	0.60	336.00
11/14/24	JMS	Update payout schedule for release of mortgage holdbacks;	0.40	124.00
11/14/24	PJR	Review Intracorp pleadings; telephone call to P. Good and email to R. Mittal on townhouse inspection; email to D. Lai on Community Fire certificates; set out and email next step analysis on Intracorp claim and PPA calculation;	0.90	697.50
11/14/24	JKH	Review inspection reports; prepare chronological table of findings	3.80	1,482.00
11/14/24	JIA	Retrieve record of proceedings from the Registry;	0.40	110.00
11/15/24	JKH	Review inspection reports and edit inspection report chronology	1.80	702.00

Date	Timekeeper	Narrative	Hours	Amount
11/15/24	PJR	Emails with T. Takagaki on Community Fire and Reference Date Aggregate Value and the Adjustment Date Aggregate Value calculations; email from R. Mittal on inspection and alleged breaches; email to P. Good at RDH;	0.20	155.00
11/15/24	NMB	Prepare payout letters releasing security deposits; obtain lawyer signature; email to owner providing of the same;	2.00	200.00
11/15/24	ELW	Review and respond to emails;	0.20	155.00
11/15/24	LAF	Various correspondence with purchaser counsel and owner of unit with tenant in arrears; Confirm release of various deposits pursuant to delayed possession agreements;	1.10	616.00
11/18/24	ELW	Review and respond to email regarding fire system;	0.20	155.00
11/18/24	LAF	Correspondence re move out;	0.20	112.00
11/18/24	JMS	Review status of final releases of financial charges; email to purchaser's lawyer with updated status of release of financial charges;	0.50	155.00
11/18/24	NMB	Email follow-up with National Bank regarding mortgage discharges; prepare payout letter to owner regarding release of security deposit;	0.60	60.00
11/19/24	PJR	Emails with T. Takagaki and D. Lai on Community Fire and Safeco issues at Joyce Place;	0.30	232.50
11/19/24	SKK	Draft email to Lisa Frey with analysis of comparable properties;	0.60	165.00
11/19/24	JMS	Review file re status of release of financial charges and delayed possession deposits; update trust balance spreadsheet;	0.60	186.00
11/19/24	NMB	Email to owners providing copies of cheque regarding release of security holdback; telephone call and email to National Bank follow up on discharges;	0.60	60.00
11/19/24	ELW	Call with Peter Roberts, Review and respond to emails regarding service contract;	0.20	155.00
11/20/24	ELW	Call with Nikka Borja;	0.20	155.00

Date	Timekeeper	Narrative	Hours	Amount
11/21/24	JMS	Follow up regarding outstanding mortgage discharges; discussions regarding release of mortgage holdbacks; update data spreadsheet and trust reconciliation statement;	0.40	124.00
11/21/24	NMB	Email to National Bank follow-up on pending mortgage discharges;	0.30	30.00
11/25/24	JMS	Email and telephone calls to lenders with outstanding releases of mortgages; receive and review signed release of mortgage; attending to release of mortgage holdbacks;	2.00	620.00
11/25/24	NMB	Email to lawyer obtaining confirmation and signature for SL 6 release of security deposit; email to accounting and owner copy of the same; email to National Bank following up on mortgage releases; true up executed Form C Release for SL 59; email to lawyer providing of the same;	1.30	130.00
11/25/24	KBB	Attend to release of mortgage holdbacks;	0.20	145.00
11/26/24	JMS	Attending to release of mortgage holdbacks; email to owners advising holdbacks are available for pick up;	1.80	558.00
11/26/24	LAF	E-sign discharge;	0.10	56.00
11/26/24	NMB	Email to owners regarding release of mortgage holdback; telephone call with owner regarding of the same;	0.60	60.00
11/27/24	NMB	Filed SL 59 Form C Release on LTSA; email to and from owners regarding query on release of mortgage holdback;	0.80	80.00
11/27/24	PJR	Review excel spread sheet on assessed values and emails with J. Darling on back up and accuracy;	0.20	155.00
11/28/24	PJR	Review PPA assessment calculations; email with J. Darling on same; discuss with Lisa Frey; draft Notice to Admit;	1.50	1,162.50
11/28/24	PJR	Review material from J. Darling on PPA calculations; discussion with Lisa Frey on calculation of same; draft Notice to Admit; review Sched G. of PSA;	0.50	387.50
11/28/24	LAF	Discuss with Peter Roberts re comparables;	0.40	224.00

Date	Timekeeper	Narrative	Hours	Amount
11/28/24	NMB	Meeting with owners to discuss questions regarding mortgage holdback and security release deposit;	0.50	50.00
11/29/24	NMB	Email to and from owner providing property manager information;	0.30	30.00
11/29/24	PJR	Email from and call to T. Takagaki on Safeco and fire system certification and monitoring;	0.20	155.00
11/29/24	LAF	Email to property manager re service contracts;	0.20	112.00
11/29/24	JMS	Receive and review pending release; email to existing lender; update discharge spreadsheet; email to purchaser's lawyer with status update of release.	0.40	124.00
Total			102.30	42,987.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	6.20	775.00	4,805.00
JACQUELINE OVSENEK	JIA	0.40	275.00	110.00
JAYDA PETERSON	JAP	5.20	100.00	520.00
JILLIAN SYCH	JMS	18.80	310.00	5,828.00
JORDAN HAYWARD	JKH	14.00	390.00	5,460.00
KATRINA BOIS	KEB2	1.90	275.00	522.50
KEITH BERGNER	KBB	0.20	725.00	145.00
KRYSTAL WONG	KPW	0.20	100.00	20.00
LISA FREY	LAF	11.20	560.00	6,272.00
MAXIME WALKER	MW1	0.30	585.00	175.50
NIKKA BORJA	NMB	16.90	100.00	1,690.00
PETER ROBERTS	PJR	15.60	775.00	12,090.00
SARAH HANNIGAN	SBH	10.80	480.00	5,184.00
SONAL KAURA	SKK	0.60	275.00	165.00
				$42,987.00

Taxable Other Charges

Photocopies	379.50

Non-Taxable Disbursements

Mastercard Charge - VAN (E) - DYE&DURHAM LSMTEC5R28-A - KF VISA 11212024	32.51
MERCHANT: Robson Square Provincial Court, Date: 2024-11-15, Retrieve record of proceedings	12.00
BC Online (E)	225.00
LTSA Services (E)	559.59

Taxable Disbursements

Mastercard Charge - Vancouver - DYE&DURHAM LSMTEC5R28-A - KF VISA 11212024	75.50
Wix.com Domain Registration for Joyceplacestrata.com - kyb visa	23.43
Wix.com Annual Webpage Hosting for Joyceplacestrata.com - kyb visa	256.80
Courier Services	32.44
BC Online	5.50
BC Online Service Charge	1.50
LTSA Service Charge	52.00
LTSA Services	22.50
Agent Fees	76.00

Total Fees		**$**	**42,987.00**
Disbursements and Other Charges		**$**	**1,754.27**
Total PST BC		**$**	**3,009.09**
Total GST		**$**	**2,195.61**
CURRENT INVOICE DUE:	**CAD**	**$**	**49,945.97**

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 12/16/24
Invoice No. 1314167
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through November 30, 2024

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1314167

Total Professional Fees		42,987.00
Total Taxable Disbursements and Other Charges		925.17
Total Exempt Disbursements and Other Charges		829.10
Total BCPST		3,009.09
Total GST		2,195.61
Total Amount Due:	**CAD $**	**49,945.97**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
Royal Bank of Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 1038033
Bank ID: 003 **Transit:** 03215
Swift Code: ROYCCAT2

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:
Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

REMITTANCE

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

LAWSON LUNDELL LLP

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

Dear Valued Clients,

We are writing to inform you of an important update regarding our banking details. As a result of Royal Bank of Canada acquiring our former financial institution HSBC Canada, our new bank account information is as follows:

Institution Number: 003

Transit Number: 03215

Account Number: 1038033

Swift Code: ROYCCAT2

Royal Bank of Canada
885 West Georgia Street
Vancouver B.C., V6C 3G1

Please note that any payments made to our former HSBC bank account will be automatically re-routed to our new bank account above for the next month.

Please continue to email us at eftpmt@lawsonlundell.com referencing the invoice number and payment amount.

If you have any questions, please feel free to contact us by email at eftpmt@lawsonlundell.com

If you would like to verbally confirm our banking details, please contact **Accounts Receivable** at 604-631-9262

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 12/31/24
Invoice No. 1319432
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including December 31, 2024, as per attached detail.

Total Professional Fees		$	3,141.00
Total Taxable Disbursements and Other Charges		$	9.70
Total Exempt Disbursements and Other Charges		$	66.99
Total PST BC		$	219.87
Total GST		$	157.54
Subtotal		$	3,595.10
Less Amount Applied From Trust:		$	(3,595.10)
Current Invoice Due:	**CAD**	**$**	**0.00**

This is our account.

Lawson Lundell LLP

Per: 

Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 12/31/24
Invoice No. 1319432
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including December 31, 2024, as follows:

Date	Timekeeper	Narrative	Hours	Amount
12/02/24	PJR	Email with L. Cahn on contract termination for Safeco Systems Ltd.;	0.10	77.50
12/04/24	NMB	Email to property manager confirming receipt of condition inspection report; draft payout letter releasing security deposit; update main data spreadsheet; telephone call with National Bank following up on the release for SL 75;	1.80	180.00
12/05/24	PJR	Call with Pal Good on Joyce Place inspection and report; call with Tetsu Takagaki on Safeco fire inspection; email to P. Good;	0.30	232.50
12/09/24	NMB	Email to lawyer providing draft payout letter to owners regarding release of security deposit; telephone call with National Bank to follow up on Form C Release;	0.80	80.00
12/09/24	PJR	Emails with T. Takagaki on Safeco invoice; instructions to Jill Sych;	0.10	77.50
12/10/24	JMS	Receive and review invoice from Safeco Systems; prepare letter to Safeco and attend to direct deposit of payment of invoice and reporting on same;	0.80	248.00
12/12/24	NMB	Report to Law Society regarding National Bank; telephone call with National Bank regarding outstanding mortgage discharge; email to owner providing an update regarding of the same;	0.80	80.00
12/12/24	LAF	Correspondence re cleaning invoice adjustment;	0.30	168.00
12/13/24	JMS	Receive and review invoice; prepare letter to AAA Plus Service Ltd.; update trust reconciliation statement;	0.50	155.00

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Date	Timekeeper	Narrative	Hours	Amount
12/16/24	NMB	Obtain lawyer signature on payout letter; attend to payout to cleaning invoice; attend to release of delayed possession holdback for Unit 506, 602 and 806; email owner regarding release of mortgage holdback;	0.80	80.00
12/16/24	JMS	Finalize and forward letter to AAA Plus Service Ltd. enclosing payment of invoice;	0.20	62.00
12/16/24	LAF	Various correspondence regarding post-closing adjustments;	0.30	168.00
12/17/24	NMB	Telephone call to National Bank regarding pending discharge of mortgage; email Terra Law providing update on releases; email owner regarding release of security deposit cheque pick-up;	0.60	60.00
12/18/24	LAF	Correspondence with property manager re moveout unit 1002;	0.20	112.00
12/18/24	LAF	Correspondence with liquidator regarding refund of strata insurance;	0.30	168.00
12/23/24	NMB	Review and receive signed Discharge from National Bank; attend to registration of the same; email to A. Shaw providing update on schedule of Discharge Particulars;	0.80	80.00
12/24/24	NMB	Email to B. Muk regarding release of mortgage holdback funds;	0.30	30.00
12/24/24	PJR	Review Intracorp response to counterclaim on Purchase Price Adjustment; email to liquidator and realtors on factual response; emails with Paul Good on report;	0.30	232.50
12/24/24	ELW	Review client response, Review and respond to emails;	0.40	310.00
12/30/24	JMS	Receive and review utility billing; prepare schedule of adjustments; update data spreadsheet; prepare letter to Liquidator enclosing payment of invoices; prepare letter to Purchaser's lawyer enclosing payment of vendor's portion of final utility billing;	1.20	372.00
12/30/24	LAF	Email correspondence regarding readjustment for utilities;	0.30	168.00
Total			11.20	3,141.00

The contents of this invoice may be subject to solicitor-client privilege. Disclosure of a privileged document to a third party could constitute a waiver of privilege. We recommend that prior to voluntarily sharing the contents of this invoice or providing a copy of it to a tax auditor or other person, that you seek legal advice.

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	0.40	775.00	310.00
JILLIAN SYCH	JMS	2.70	310.00	837.00
LISA FREY	LAF	1.40	560.00	784.00
NIKKA BORJA	NMB	5.90	100.00	590.00
PETER ROBERTS	PJR	0.80	775.00	620.00
				$3,141.00

Taxable Other Charges

Photocopies	1.20

Non-Taxable Disbursements

LTSA Services (E)	66.99

Taxable Disbursements

LTSA Service Charge	6.00
LTSA Services	2.50

Total Fees		**$ 3,141.00**
Disbursements and Other Charges		**$ 76.69**
Total PST BC		**$ 219.87**
Total GST		**$ 157.54**
Subtotal		**$ 3,595.10**
Less Amount Applied From Trust:		**$ (3,595.10)**
CURRENT INVOICE DUE:	**CAD**	**$ 0.00**

Outstanding Prior Balance

Invoice No. 1314167 12/16/24 $ 49,945.97

The contents of this invoice may be subject to solicitor-client privilege. Disclosure of a privileged document to a third party could constitute a waiver of privilege. We recommend that prior to voluntarily sharing the contents of this invoice or providing a copy of it to a tax auditor or other person, that you seek legal advice.

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 12/31/24
Invoice No. 1319432
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through December 31, 2024

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1319432

Total Professional Fees		3,141.00
Total Taxable Disbursements and Other Charges		9.70
Total Exempt Disbursements and Other Charges		66.99
Total BCPST		219.87
Total GST		157.54
Subtotal		3,595.10
Less Amount Applied From Trust:		(3,595.10)
Total Amount Due:	**CAD $**	**0.00**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
Royal Bank of Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 1038033
Bank ID: 003 **Transit:** 03215
Swift Code: ROYCCAT2

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:
Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

REMITTANCE

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 02/18/25
Invoice No. 1323473
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including January 31, 2025, as per attached detail.

Total Professional Fees		$	32,073.50
Total Taxable Disbursements and Other Charges		$	14.28
Total PST BC		$	2,245.14
Total GST		$	1,604.39
Current Invoice Due:	**CAD**	**$**	**35,937.31**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 02/18/25
Invoice No. 1323473
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including January 31, 2025, as follows:

Date	Timekeeper	Narrative	Hours	Amount
01/02/25	NMB	Draft letter to Unit 501 regarding release of delayed deposit;	0.60	135.00
01/03/25	NMB	Draft letter to Unit 1101 regarding release of delayed deposit; update email data spreadsheet;	0.50	112.50
01/03/25	LAF	Various correspondence with property manager re owners re move out;	0.30	184.50
01/06/25	LAF	Emails to purchaser's property manager re change of staffing;	0.20	123.00
01/07/25	NMB	Draft payout letter for Unit 1002 regarding release of delayed possession holdback; obtain lawyer signature of the same; email to trust providing of the same for processing; update main data spreadsheet; email to Unit 1002 confirming cheque available for pick-up and respond to queries;	0.90	202.50
01/07/25	ELW	Review and respond to emails with H. B. - Purchase Price Adjustment; Call with Jillian Sych regarding utility bill adjustment;	0.50	412.50
01/08/25	PJR	Return telephone call to H. Buck on PSA Sched. G issues	0.10	83.50
01/08/25	LAF	Correspondence regarding issuance of strata insurance refund cheque;	0.30	184.50
01/09/25	PJR	Review P. Good report on townhouses; telephone call to P. Good on same; return telephone call from Paul Good to discuss report revisions;	0.80	668.00
01/13/25	JMS	Review updated calculations of final utility adjustments; attend to payment of vendor's portion of final utility bill and liquidator's outstanding fees;	0.30	94.50

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Date	Timekeeper	Narrative	Hours	Amount
01/13/25	ELW	Call with Peter Roberts regarding issues regarding Price Adjustment; Review and respond to emails;	0.50	412.50
01/14/25	PJR	Discussion with Lisa Frey and Ed Wilson on proof and evidence on Comparable Development Changes;	0.40	334.00
01/14/25	JDF	Discussion with Ed Wilson and Lisa Frey, emails with Ed Wilson and Lisa Frey concerning, preliminary consideration of strategy on post-closing valuation issue;	0.60	459.00
01/14/25	NMB	Email to property manager obtaining information on units with completed inspection reports; draft letter to owner regarding release of delayed possession holdback; obtain lawyer signature of the same; update main data spreadsheet;	0.80	180.00
01/14/25	ELW	Review and respond to emails regarding adjustments;	0.30	247.50
01/14/25	LAF	Initial discussions with J. Fraser re purchase price adjustment;	0.50	307.50
01/15/25	JDF	Review and consider background materials and issues, discussion and e-mails with Peter Roberts, emails with Peter Roberts, Lisa Frey and Ed Wilson concerning same;	0.80	612.00
01/15/25	PJR	Call with and email to Jim Fraser on experts to address "Comparable Development Changes";□	0.20	167.00
01/15/25	NMB	Email to property manager providing email query from owners and obtaining inspection reports; draft letter releasing delayed possession holdback; obtain lawyer signature for the same; update main data spreadsheet; email to accounting providing signed payout letters; email to B. Muk providing copy of his signed and filed release; email to owner regarding cheque pick-up;	3.00	675.00
01/15/25	ELW	Call with Peter Roberts; Meeting with Jim Fraser;	0.40	330.00
01/15/25	LAF	Email to Colliers re Purchase Price Adjustment underlying calculations; Discussions with P. Roberts and E. Wilson re next steps; Email to J. Fraser re property appraisal in Schedule G of purchase and sale agreement; Various correspondence regarding release of delayed possession agreement deposits;	2.30	1,414.50

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Date	Timekeeper	Narrative	Hours	Amount
01/16/25	JDF	Further review and consider pleadings concerning nature of dispute over purchase price adjustment and need for planning and appraisal evidence on same, calls and e-mails with Peter Roberts and Ed Wilson concerning same;	2.50	1,912.50
01/16/25	PJR	Email from P. Good; revise revised report; call with P. Good on same; reporting email to D. Lai on next steps in Intracorp claim;	1.10	918.50
01/17/25	JDF	Emails and discussions with Peter Roberts concerning, further consider, grounds to challenge denial of price adjustment;	1.80	1,377.00
01/17/25	PJR	Discussions with and review emails from Jim Fraser on Intracrop PPA issues and evidentiary proof;	0.40	334.00
01/17/25	NMB	Email response to owner regarding release of delayed possession holdback;	0.30	67.50
01/17/25	ELW	Review purchase price adjustment memo;	0.30	247.50
01/17/25	ELW	Call with Jim Fraser; Review documents;	0.50	412.50
01/18/25	JDF	Further consider strategy, engagement of appraiser and planner	0.40	306.00
01/20/25	NMB	Attend to release of delayed possession holdback; email to owner providing update; email to L. Fu confirming units eligible for release of holdback;	0.80	180.00
01/20/25	JDF	Calls with Chuck Brook, Peter Roberts, e-mails with Chuck, Peter and Ed concerning Chuck's preliminary views on price adjustment planning perspective and engagement of Chuck for expert evidence, consider same	1.60	1,224.00
01/20/25	LAF	Email to Nikka Borja re move out of owner;	0.20	123.00
01/20/25	LAF	Email to Jim Fraser re conditions precedent and waiver dates;	0.40	246.00
01/21/25	JDF	Further consider price adjustment litigation strategy and expert evidence, meetings with Ed and Lisa concerning same, review and consider zonings and development plan for subject property	2.40	1,836.00
01/21/25	LAF	Discussion with Ed Wilson and Jim Fraser re comparables for litigation purposes;	0.60	369.00

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Date	Timekeeper	Narrative	Hours	Amount
01/21/25	ELW	Call with Jim Fraser and Lisa Frey regarding Purchase Price Adjustment;	0.50	412.50
01/21/25	ELW	Call with Lisa Frey and Peter Roberts;	0.40	330.00
01/22/25	JDF	Further analysis of strategy, discussions and e-mails with Peter, Ed and Lisa concerning same and concerning engagement of Chuck Brook as planner	1.40	1,071.00
01/22/25	PJR	Email to D. Lai on Chuck Brook and appraiser for PPA claim; instruction to Jordan Hayward on P. Good affidavit;	0.30	250.50
01/22/25	JKH	Conference with Peter Roberts; review documents and previous correspondence; research and begin drafting affidavit #1 of P. Good;	3.70	1,572.50
01/22/25	LAF	Correspondence with insurer re refund cheque;	0.30	184.50
01/22/25	ELW	Review Purchase and Sale agreement regarding Purchase price adjustment, call with Peter Roberts, Review and respond to emails, Call with Jim Fraser;	0.80	660.00
01/23/25	JDF	Emails with Derek et al concerning, further consider, strategy, zoning issues and scope and extent of expert evidence;	0.70	535.50
01/23/25	JKH	Correspondence with P. Good; prepare exhibit package; draft affidavit #1 of P. Good;	0.50	212.50
01/23/25	NMB	Attend to payout of Unit 406;	0.50	112.50
01/24/25	JDF	Further consider zoning issues	0.40	306.00
01/24/25	JMS	Receive and review invoices; prepare letter to liquidator enclosing payment of invoices;	0.50	157.50
01/24/25	PJR	Emails with D. Lai; review and revise Liquidator up-date letter to former owners;	0.30	250.50
01/24/25	JKH	Review previous investigation reports; draft and edit affidavit of P. Good;	1.80	765.00
01/24/25	LAF	Send email update to former owners; Sign letters regarding payment of invoices;	0.20	123.00
01/25/25	PJR	Review and revise P. Good affidavit on inspections; instructions to Jordan Hayward;	0.40	334.00

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Date	Timekeeper	Narrative	Hours	Amount
01/25/25	JKH	Finalize affidavit #1 of P. Good; email to Peter Roberts for review;	1.00	425.00
01/27/25	JDF	Messages and e-mails with Chuck Brook re: engagement for planning advice, consider instructions and documents to instruct Chuck	0.60	459.00
01/27/25	JKH	Conduct document review regarding fire readiness; begin drafting affidavit of T. Takagaki regarding fire readiness;	3.10	1,317.50
01/27/25	NMB	Email to L. Fu regarding Unit 1002 release of security deposit;	0.30	67.50
01/28/25	JDF	Further consider strategy, documents and instructions for Chuck, messages and e-mails with Chuck concerning preliminary discussion on same, call with Peter Roberts concerning status, next steps and strategy	1.20	918.00
01/28/25	JKH	Draft and finalize affidavit #1 of T. Takagaki; email to Peter Roberts for review and comment;	1.50	637.50
01/29/25	JDF	Further prep call with Chuck re instructions;	0.60	459.00
01/29/25	JKH	Revise affidavit of T. Takagaki and send to Peter Roberts for review; email to R. Saucier regarding affidavit; phone call with R. Saucier; arrange meeting with P. Good; begin drafting affidavit #1 of R. Saucier;	2.00	850.00
01/30/25	JDF	Further prep and attend Teams call with Chuck Brook to review background facts, documents, issues and anticipated planning questions for expert planning analysis of price adjustment dispute, post-call consideration of same	2.40	1,836.00
01/30/25	PJR	Review and revise P. Good affidavit; instructions to Jordan Hayward;	0.10	83.50
01/30/25	JKH	Review P. Good's 2025 condition report; phone call with P. Good and review affidavit based on phone call;	1.10	467.50
01/31/25	JDF	Further consider planning issues and instructions, candidates for appraisal expertise, message and e-mail to Peter concerning pleadings amendment	0.50	382.50
Total			54.70	32,073.50

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Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	4.20	825.00	3,465.00
JILLIAN SYCH	JMS	0.80	315.00	252.00
JIM FRASER	JDF	17.90	765.00	13,693.50
JORDAN HAYWARD	JKH	14.70	425.00	6,247.50
LISA FREY	LAF	5.30	615.00	3,259.50
NIKKA BORJA	NMB	7.70	225.00	1,732.50
PETER ROBERTS	PJR	4.10	835.00	3,423.50
				$32,073.50

Taxable Other Charges

Photocopies	3.00

Taxable Disbursements

Courier Services	11.28

Total Fees		**$**	**32,073.50**
Disbursements and Other Charges		**$**	**14.28**
Total PST BC		**$**	**2,245.14**
Total GST		**$**	**1,604.39**
CURRENT INVOICE DUE:	**CAD**	**$**	**35,937.31**

Outstanding Prior Balance

Invoice No.	1314167	12/16/24	$	49,945.97

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 02/18/25
Invoice No. 1323473
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through January 31, 2025

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1323473

Total Professional Fees		32,073.50
Total Taxable Disbursements and Other Charges		14.28
Total BCPST		2,245.14
Total GST		1,604.39
Total Amount Due:	**CAD $**	**35,937.31**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
Royal Bank of Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 1038033
Bank ID: 003 **Transit:** 03215
Swift Code: ROYCCAT2

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:

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

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

REMITTANCE

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 03/17/25
Invoice No. 1330179
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including February 28, 2025, as per attached detail.

Total Professional Fees		$	24,758.00
Total Taxable Disbursements and Other Charges		$	165.20
Total Exempt Disbursements and Other Charges		$	190.00
Total PST BC		$	1,733.06
Total GST		$	1,246.16
Current Invoice Due:	**CAD**	**$**	**28,092.42**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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PAYMENT IS DUE UPON RECEIPT OF INVOICE
INTEREST ON OVERDUE ACCOUNTS WILL BE CHARGED 12% PER ANNUM
GST #R115124141

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 03/17/25
Invoice No. 1330179
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including February 28, 2025, as follows:

Date	Timekeeper	Narrative	Hours	Amount
02/02/25	JDF	Further consider strategy on planning and appraisal	0.40	306.00
02/03/25	JDF	Call and messages with Chuck Brook concerning preliminary thinking on exclusion clause applicability, e-mails with Peter and Ed concerning and further consider same, e-mails with Lisa concerning alternative strategy to eliminate single comp, message to Chuck concerning same	1.80	1,377.00
02/03/25	JKH	Prepare affidavit #1 of P. Good for printing; review correspondence and draft affidavit #1 of R. Saucier; email draft of affidavit of R. Saucier and exhibit package to Peter Roberts for review;	2.10	892.50
02/03/25	NMB	Email to owner regarding release of security deposit;	0.80	180.00
02/03/25	LAF	Email to and discussion with J. Fraser re planning investigation and potential approach to comparables;	1.40	861.00
02/04/25	JDF	Further consider strategy on price adjustment claim, argument for exclusion of single comparable, instructions to Chuck Brook, e-mails with Lisa Frey concerning and prep call with Chuck and Lisa concerning same	0.80	612.00
02/04/25	JKH	Conduct review of invoices for electrical work done at Joyce Place; phone call with Peter Roberts and R. Saucier; email to P. Good to arrange meeting to swear affidavit;	0.90	382.50
02/04/25	NMB	Email to L. Fu confirming receipt of inspection report;	0.30	67.50
02/04/25	ELW	Call with James Fraser;	0.20	165.00

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Date	Timekeeper	Narrative	Hours	Amount
02/05/25	JDF	Call with Lisa concerning merits of challenge to Wall comparable, prep and attend call with Chuck and Lisa concerning overall strategy	2.40	1,836.00
02/05/25	JKH	Attempt phone call to R. Saucier; meet P. Good to affirm affidavit;	1.00	425.00
02/05/25	NMB	Confirm release of Unit 303 security deposit; attend to payout of the same;	0.60	135.00
02/05/25	LAF	Prepare for and attend videoconference with appraisal consultant re purchase price calculation;	1.20	738.00
02/06/25	JDF	Further consider strategy and next steps with experts;	0.70	535.50
02/06/25	JKH	Leave two messages with R. Saucier; revise affidavit #1 of R. Saucier;	0.30	127.50
02/06/25	NMB	Attend to release of Unit 306 security deposit;	0.50	112.50
02/06/25	LAF	Various emails to purchaser's counsel re dispute over unit condition;	1.10	676.50
02/07/25	NMB	Email to owners confirming inspection report for Unit 1001;	0.50	112.50
02/07/25	JKH	Correspondence with R. Saucier regarding his affidavit;	0.80	340.00
02/10/25	NMB	Email to and from property manager and Unit 1001 confirming release of security deposit; attend to payout of the same;	0.60	135.00
02/10/25	JDF	Further consider appraisal engagement candidates, strategy and next steps;	0.60	459.00
02/10/25	JKH	Emails and telephone call with R. Saucier to discuss details of fire system work at Joyce Place; begin revising affidavit of R. Saucier based on his instruction;	3.00	1,275.00
02/11/25	JDF	Further consider strategy and next steps;	0.40	306.00
02/11/25	PJR	Review and revise draft R. Saucier affidavit; instructions to Jordan Hayward;	0.20	167.00

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Date	Timekeeper	Narrative	Hours	Amount
02/11/25	JKH	Draft, edit, and send affidavit #1 of R. Saucier to Peter Roberts for review and comment; revise affidavit and send to R. Saucier for review;	2.30	977.50
02/12/25	JKH	Review and apply affidavit comments from R. Saucier and email to R. Saucier with revised draft for review and comment;	0.60	255.00
02/12/25	NMB	Attend to payout of security deposit; email to owners regarding of the same;	0.30	67.50
02/13/25	PJR	Email from and call with D. Lai on status of Intracorp claim;	0.10	83.50
02/13/25	JMS	Attend to receipt of funds from insurance agents; prepare letter to RDH Building Science Inc. enclosing payment of invoices; update data spreadsheet;	0.50	157.50
02/13/25	LAF	Email to owners unit 601 re condition of unit dispute;	0.50	307.50
02/14/25	JMS	Update letter to RDH to include payment of additional invoice; update data spreadsheet;	0.30	94.50
02/14/25	PJR	Review and revise Takagaki #1; call to T. Takagaki; email to T. Takagaki on affidavit evidence;	0.40	334.00
02/14/25	JKH	Conference with Peter Roberts and email draft affidavit to Peter Roberts for review; complete and send exhibit package of T. Takagaki;	0.60	255.00
02/14/25	LAF	Coordinate payment of invoices;	0.20	123.00
02/15/25	JKH	Revise affidavit of R. Saucier and email back and arrange for time to swear affidavit;	0.30	127.50
02/16/25	JKH	Finalize time to swear affidavit of R. Saucier;	0.20	85.00
02/17/25	ELW	Call with Lisa Frey;	0.20	165.00
02/17/25	LAF	Email to former owners re update;	0.20	123.00
02/18/25	NMB	Email to lawyer providing updated owner email addresses; draft payout letter to Unit 601 and to Intracorp enclosing payment for plumbing invoice; prepare memo to accounting and requisition form; email to owners regarding cheque available for pick-up;	2.40	540.00

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Date	Timekeeper	Narrative	Hours	Amount
02/18/25	JDF	Further consider scope of required planning and appraisal advice	0.30	229.50
02/18/25	JKH	Request cheque for R. Saucier and prepare affidavit; phone call with Peter Roberts; email to Shauna Sigurdson regarding document disclosure;	0.80	340.00
02/18/25	ELW	Review and respond to emails regarding memo for Unit 601;	0.20	165.00
02/18/25	SLS	Email instructions from J. Hayward regarding document review and collection;	0.10	27.00
02/19/25	NMB	Attend to release of delayed possession holdback and payout to Intracorp for Unit 601 payment to plumbing invoice;	1.10	247.50
02/19/25	PJR	Review City of Vancouver prosecution materials and draft A. Cheng affidavit; instructions to Jordan Hayward on Notice of Application;	0.40	334.00
02/19/25	JKH	Meet R. Saucier and take affidavit; scan and file executed copy and send to Peter Roberts; conference with Peter Roberts and begin researching applications under rule 9-7; begin drafting notice of application;	2.90	1,232.50
02/19/25	SLS	Email request to IT department to copy contents of file for review for potential production; export for ingesting into database; create database for production;	0.40	108.00
02/20/25	NMB	Telephone call with Unit 303 regarding security deposit and updated contact info; update main dataspreadsheet; attend to payout of to Intracorp;	1.00	225.00
02/20/25	JKH	Review notice of civil claim and response; phone call with Nikka Borja; review previous correspondence relating to closing matter; continue drafting notice of application;	2.00	850.00
02/21/25	JDF	Further consider planning and appraisal advice	0.40	306.00
02/21/25	JKH	Review affidavits previously filed in Vancouver Reg. Action S-S246230 and corresponding orders; continue drafting notice of application;	2.60	1,105.00
02/24/25	JKH	Review jurisprudence on summary trial application; draft legal basis section of notice of application;	2.00	850.00

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Date	Timekeeper	Narrative	Hours	Amount
02/26/25	JKH	Continue drafting legal basis section of notice of application;	0.90	382.50
02/27/25	JKH	Review documents and correspondence; continue drafting notice of application; obtain and review adjustment to purchase price for inclusion in application;	1.90	807.50
02/27/25	LAF	Email to Jordan Hayward re purchase price calculation memorandum;	0.10	61.50
02/27/25	ELW	Review and respond to emails with Jordan Hayward;	0.20	165.00
02/28/25	PJR	Review and revise A. Cheng #1 affidavit;	0.20	167.00
02/28/25	JKH	Continue drafting legal basis section and overview of notice of application;	1.70	722.50
02/28/25	SLS	Review pleading; review documents for relevance;	1.90	513.00
Total			52.80	24,758.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	0.80	825.00	660.00
JILLIAN SYCH	JMS	0.80	315.00	252.00
JIM FRASER	JDF	7.80	765.00	5,967.00
JORDAN HAYWARD	JKH	26.90	425.00	11,432.50
LISA FREY	LAF	4.70	615.00	2,890.50
NIKKA BORJA	NMB	8.10	225.00	1,822.50
PETER ROBERTS	PJR	1.30	835.00	1,085.50
SHAUNA SIGURDSON	SLS	2.40	270.00	648.00
				$24,758.00

Taxable Other Charges

Photocopies	58.20
Colour Photocopies	107.00

Non-Taxable Disbursements

Vendor: RENE SAUCIER; Invoice#: 02/18/2025; Date: 2/18/2025 - Compensation for swearing of an affidavit regarding electrical work performed at Joyce Place / JKH/ESK	190.00

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Total Fees		**$ 24,758.00**
Disbursements and Other Charges		**$ 355.20**
Total PST BC		**$ 1,733.06**
Total GST		**$ 1,246.16**
CURRENT INVOICE DUE:	**CAD**	**$ 28,092.42**

Outstanding Prior Balance

Invoice No.	1314167	12/16/24	$	49,945.97
Invoice No.	1323473	02/18/25	$	35,937.31

The contents of this invoice may be subject to solicitor-client privilege. Disclosure of a privileged document to a third party could constitute a waiver of privilege. We recommend that prior to voluntarily sharing the contents of this invoice or providing a copy of it to a tax auditor or other person, that you seek legal advice.

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 03/17/25
Invoice No. 1330179
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through February 28, 2025

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1330179

Total Professional Fees		24,758.00
Total Taxable Disbursements and Other Charges		165.20
Total Exempt Disbursements and Other Charges		190.00
Total BCPST		1,733.06
Total GST		1,246.16
Total Amount Due:	**CAD $**	**28,092.42**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
Royal Bank of Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 1038033
Bank ID: 003 **Transit:** 03215
Swift Code: ROYCCAT2

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in separate email.

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:
Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

REMITTANCE

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 04/28/25
Invoice No. 1335323
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including March 31, 2025, as per attached detail.

Total Professional Fees		$	16,990.50
Total Taxable Disbursements and Other Charges		$	100.40
Total Exempt Disbursements and Other Charges		$	86.51
Total PST BC		$	1,189.34
Total GST		$	854.55
Current Invoice Due:	**CAD**	**$**	**19,221.30**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 04/28/25
Invoice No. 1335323
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including March 31, 2025, as follows:

Date	Timekeeper	Narrative	Hours	Amount
03/03/25	JKH	Correspondence on file matters; review purchase and sale agreement; continue drafting notice of application;	2.30	977.50
03/04/25	JDF	Emails with Chuck concerning account for expert advice, review and approve same for payment, consider advice;	0.30	229.50
03/04/25	JKH	Conference with Peter Roberts; edit Notice of Application; phone call with Shauna Sigurdson regarding document disclosure;	3.20	1,360.00
03/04/25	SLS	Review documents for relevance; copy and ingest into database; save and email search criteria to Jordan Hayward for review;	2.10	567.00
03/04/25	LAF	Coordinate payment of Chuck Brook invoice;	0.20	123.00
03/05/25	PJR	Commission Affidavit #3 of Ashley Cheng;	0.10	83.50
03/05/25	NMB	Draft Unit 801 release of delayed possession holdback;	0.50	112.50
03/05/25	JKH	Conference with Shauna Sigurdson; begin document review;	3.60	1,530.00
03/06/25	JMS	Prepare letter to C. Brook Real Estate Advisor enc. payment of invoice; update data spreadsheet;	0.60	189.00
03/07/25	JKH	Revise legal basis section to include circumstances as to when conditions under a purchase and sale agreement will be deemed discharged and include in legal basis; edit notice of application;	1.80	765.00
03/08/25	JKH	Edit and send notice of application to Peter Roberts for review;	3.40	1,445.00

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Date	Timekeeper	Narrative	Hours	Amount
03/09/25	PJR	Review summary trial application;	1.90	1,586.50
03/10/25	PJR	Further review and revise of Notice of Application for summary judgment; instructions to Jordan Hayward; email to T. Takagaki on draft Notice of Application;	1.40	1,169.00
03/10/25	JKH	Conference with Peter Roberts and follow up email regarding affidavit pinpoints for inclusion in Notice of Application; revise Notice of Application per comments from T. Takagaki;	1.30	552.50
03/11/25	JKH	Consider comments on application from D. Lai; instructions to Ashley Cheng; conduct document review and instructions to Shauna Sigurdson;	3.10	1,317.50
03/11/25	PJR	Emails with D. Lai and T. Takagaki to finalize Notice of Application; finalize same; review and revise Liquidator letter to owners; revise website content; emails with T. Takagaki on same;	0.60	501.00
03/12/25	JDF	Discussion with Peter concerning next steps and timing, consider same	0.30	229.50
03/12/25	PJR	Draft service letter to Intracorp counsel;	0.10	83.50
03/12/25	JKH	Service instructions to Ashley Cheng; correspondence with Shauna Sigurdson regarding list of documents;	0.40	170.00
03/12/25	SLS	Create and save search criteria (x4) for review by Jordan Hayward; email criteria to Jordan Hayward for review;	0.30	81.00
03/13/25	SLS	Index documents in preparation for production of List of Documents;	1.00	270.00
03/14/25	ELW	Call with Peter Roberts regarding issues;	0.20	165.00
03/17/25	NMB	Attend to payout of Unit 801 release of delayed possession holdback; email to owner regarding holdback payout;	0.50	112.50
03/17/25	JKH	Review letter from R. Mittal;	0.10	42.50
03/18/25	SLS	Index documents in preparation for production of List of Documents;	0.80	216.00
03/19/25	NMB	Draft letter to RDH building science regarding payout of invoice; email to lawyer obtaining signature; attend to payout regarding of the same;	0.60	135.00

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Date	Timekeeper	Narrative	Hours	Amount
03/19/25	DLH	Index documents in preparation for production on List of Documents;	2.50	625.00
03/19/25	LAF	Attend to RDH invoice payment;	0.20	123.00
03/20/25	JKH	Email filed pleadings to T. Takagaki;	0.10	42.50
03/21/25	JKH	Email to T. Takagaki; prepare and send update to former owners;	0.40	170.00
03/21/25	LAF	Coordinate sending owner's update;	0.20	123.00
03/24/25	JKH	Instruction to Shauna Sigurdson;	0.10	42.50
03/25/25	JKH	Instructions to Shauna Sigurdson;	0.10	42.50
03/25/25	SLS	Email from/to Jordan Hayward regarding productions; conduct quality control of relevance tags; save and email updated search criteria to Jordan Hayward to review;	0.70	189.00
03/27/25	JKH	Continue document review;	0.40	170.00
03/28/25	JDF	Further consider planning advice	0.30	229.50
03/30/25	PJR	Letter from and email to R. Mittal on hearing date; reporting email to D. Lai on same; revise website;	0.20	167.00
03/31/25	JDF	Further consider planning and appraisal strategy	0.30	229.50
03/31/25	NMB	Email to property manager providing condition inspection report for Unit 801;	0.30	67.50
03/31/25	LAF	Correspondence with property manager and owner re move out;	0.20	123.00
03/31/25	SLS	Draft form of List of Documents;	1.40	378.00
03/31/25	JKH	Conduct document review; email to Shauna Sigurdson;	0.60	255.00
Total			38.70	16,990.50

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Fee Summary

Timekeeper	Initials	Hours	Rate	Total
DARLENE HICKEY	DLH	2.50	250.00	625.00
ED WILSON	ELW	0.20	825.00	165.00
JILLIAN SYCH	JMS	0.60	315.00	189.00
JIM FRASER	JDF	1.20	765.00	918.00
JORDAN HAYWARD	JKH	20.90	425.00	8,882.50
LISA FREY	LAF	0.80	615.00	492.00
NIKKA BORJA	NMB	1.90	225.00	427.50
PETER ROBERTS	PJR	4.30	835.00	3,590.50
SHAUNA SIGURDSON	SLS	6.30	270.00	1,701.00
				$16,990.50

Taxable Other Charges

Photocopies	53.40

Non-Taxable Disbursements

LTSA Services (E)	6.51
Agent Fees (E)	80.00

Taxable Disbursements

Ashley Cheng - CSO Invoice #: 1513144341 None	5.50
BC Online Service Charge	1.50
LTSA Service Charge	2.00
Agent Fees	38.00

Total Fees		**$ 16,990.50**
Disbursements and Other Charges		**$ 186.91**
Total PST BC		**$ 1,189.34**
Total GST		**$ 854.55**
CURRENT INVOICE DUE:	**CAD**	**$ 19,221.30**

Outstanding Prior Balance

Invoice No.	1314167	12/16/24	$ 49,945.97
Invoice No.	1323473	02/18/25	$ 35,937.31
Invoice No.	1330179	03/17/25	$ 28,092.42

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 04/28/25
Invoice No. 1335323
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through March 31, 2025

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1335323

Total Professional Fees		16,990.50
Total Taxable Disbursements and Other Charges		100.40
Total Exempt Disbursements and Other Charges		86.51
Total BCPST		1,189.34
Total GST		854.55
Total Amount Due:	**CAD $**	**19,221.30**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
Royal Bank of Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 1038033
Bank ID: 003 **Transit:** 03215
Swift Code: ROYCCAT2

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:
Lawson Lundell LLP
Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in a separate email.

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

REMITTANCE

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 05/19/25
Invoice No. 1339235
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including April 30, 2025, as per attached detail.

Total Professional Fees		$	11,408.50
Total Taxable Disbursements and Other Charges		$	6.00
Total PST BC		$	798.60
Total GST		$	570.73
Current Invoice Due:	**CAD**	**$**	**12,783.83**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 05/19/25
Invoice No. 1339235
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including April 30, 2025, as follows:

Date	Timekeeper	Narrative	Hours	Amount
04/02/25	JKH	Review documents for redactions; email to Shauna Sigurdson;	0.60	255.00
04/04/25	SLS	Review redactions notes by Jordan Hayward; redaction emails for relevance or privileges; revised Indexing of documents in preparation for production of List of Documents;	1.00	270.00
04/09/25	NMB	Update Unit 402 contact information;	0.20	45.00
04/09/25	PJR	Review and revise draft update letter to Joyce Place owners; emails with D. Lai on same; draft letter to trial division seeking priority;	0.40	334.00
04/09/25	JKH	Send litigation update to former owners;	0.30	127.50
04/10/25	PJR	Email with Intracorp counsel, on hearing dates;	0.10	83.50
04/11/25	JKH	Review affidavit exhibits and email to Shauna Sigurdson regarding list of documents;	0.20	85.00
04/11/25	SLS	Redaction documents for privilege; review file; email Jordan Hayward regarding documents; download and copy document for importing into ediscovery platform; upload documents into ediscovery platform; draft Schedule a listing for production; revise form of List of Documents;	1.60	432.00
04/12/25	JKH	Review documents for redaction and email to Shauna Sigurdson;	0.20	85.00
04/14/25	JDF	Consider next steps and strategy	0.40	306.00
04/14/25	JKH	Conference with Shauna Sigurdson regarding redactions in list of documents;	0.40	170.00

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Date	Timekeeper	Narrative	Hours	Amount
04/14/25	SLS	Create production set of Crowe MacKay's producible records in industry standard format for exchange with opposing counsel; conduct quality control of production; generate Schedule A; generate Schedule B; Copy and upload producible documents to filesend; email file sent to .Jordan Hayward for review and distribution;	1.00	270.00
04/15/25	JDF	Further consider Chuck's instructions and strategy	0.30	229.50
04/15/25	JKH	Review final list of documents and email to Peter Roberts;	0.20	85.00
04/17/25	JKH	Finalize and list of documents and draft cover letter for delivery;	0.30	127.50
04/17/25	JDF	Discussion with Peter concerning, further consider next steps, pleadings amendment	0.60	459.00
04/18/25	JKH	Service instructions to Emma Kristensen;	0.10	42.50
04/21/25	JDF	Further consider strategy and next steps;	0.40	306.00
04/22/25	JKH	Review list of document and instructions to Emma Kristensen; review email from D. Lai and review documents; instructions to Shauna Sigurdson about removing documents;	0.50	212.50
04/23/25	JKH	Correspondence with Shauna Sigurdson regarding striking documents;	0.20	85.00
04/23/25	JDF	Further consider Chuck's advice, further instructions to Chuck, engagement of appraiser and economist	0.50	382.50
04/24/25	JDF	Further review, consider and prepare status report to Peter and Derek, consider remaining steps and timing, strategy on same, discussion with Peter concerning same, prep council meeting, prep call with Chuck Brook to update working advice	1.30	994.50
04/24/25	PJR	Email form Jim Fraser on counterclaim issues and next steps; reporting email to D. Lai on same;	0.50	417.50
04/24/25	ELW	Review and respond to emails, call with Jim Fraser;	0.30	247.50
04/25/25	JDF	Prep and attend meeting with Chuck Brook to update planning evidence, further consider strategy, prep council meeting	1.00	765.00

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Date	Timekeeper	Narrative	Hours	Amount
04/25/25	PJR	Revise Liquidator's update to strata council; email to J. Cytrynbaum on Intracorp response materials;	0.40	334.00
04/25/25	JMS	Receive and review invoice; prepare letter to Target Zero Waste enc. payment of invoice; update data spreadsheet;	0.50	157.50
04/25/25	LAF	Email to nonresident owner regarding order to pay;	0.20	123.00
04/25/25	SLS	Revise Schedule as per instructions from Jordan Hayward; revise Schedule A; email to Jordan Hayward regarding further edits;	0.40	108.00
04/28/25	JDF	Further consider questions for Assessor concerning valuation of comparables for assessment, call and e-mails with Vancouver assessment office to set up call re: same	0.40	306.00
04/28/25	JKH	Review settlement offer from opposing counsel;	0.20	85.00
04/29/25	JDF	Further consider instructions to Chuck on expert report, questions for Assessor, prep update meeting with former council members;	0.60	459.00
04/30/25	JDF	Discussion with Peter concerning preparation for status call with council, e-mails and discussion with Peter concerning implications of Intracorp settlement offer, prepare and send questions to Julie (Assessor), prep call with Julie (Assessor), call with Julie to discuss Assessor's perspective on relevance of "triggers" to assessed values of Comparable Development Strata Lots, prep and attend status call with council	2.20	1,683.00
04/30/25	PJR	Review formal offer letter from R. Mittal; call with D. Lai on same; reporting email to former strata council members; strategy discuss with Jim Fraser; status call with D. Lai, T. Takagaki, S. Davison, Brian Muk, S. Dimitrie and Jim Fraser on Intracorp litigation;	1.60	1,336.00
Total			19.10	11,408.50

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Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	0.30	825.00	247.50
JILLIAN SYCH	JMS	0.50	315.00	157.50
JIM FRASER	JDF	7.70	765.00	5,890.50
JORDAN HAYWARD	JKH	3.20	425.00	1,360.00
LISA FREY	LAF	0.20	615.00	123.00
NIKKA BORJA	NMB	0.20	225.00	45.00
PETER ROBERTS	PJR	3.00	835.00	2,505.00
SHAUNA SIGURDSON	SLS	4.00	270.00	1,080.00
				$11,408.50

Taxable Other Charges

Photocopies	6.00

Total Fees		**$ 11,408.50**
Disbursements and Other Charges		**$ 6.00**
Total PST BC		**$ 798.60**
Total GST		**$ 570.73**
CURRENT INVOICE DUE:	**CAD**	**$ 12,783.83**

Outstanding Prior Balance

Invoice No.	1314167	12/16/24	$ 49,945.97
Invoice No.	1323473	02/18/25	$ 35,937.31
Invoice No.	1330179	03/17/25	$ 28,092.42
Invoice No.	1335323	04/28/25	$ 19,221.29

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 05/19/25
Invoice No. 1339235
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through April 30, 2025

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1339235

Total Professional Fees	11,408.50
Total Taxable Disbursements and Other Charges	6.00
Total BCPST	798.60
Total GST	570.73
Total Amount Due: **CAD $**	**12,783.83**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
Royal Bank of Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 1038033
Bank ID: 003 **Transit:** 03215
Swift Code: ROYCCAT2

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:
Lawson Lundell LLP
Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.
Please send password to eftpmt@lawsonlundell.com in a separate email.

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

REMITTANCE

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 06/20/25
Invoice No. 1343984
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including May 31, 2025, as per attached detail.

Total Professional Fees		$	14,041.00
Total Taxable Disbursements and Other Charges		$	51.63
Total PST BC		$	982.87
Total GST		$	704.63
Current Invoice Due:	**CAD**	**$**	**15,780.13**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

The contents of this invoice may be subject to solicitor-client privilege. Disclosure of a privileged document to a third party could constitute a waiver of privilege. We recommend that prior to voluntarily sharing the contents of this invoice or providing a copy of it to a tax auditor or other person, that you seek legal advice.

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 06/20/25
Invoice No. 1343984
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including May 31, 2025, as follows:

Date	Timekeeper	Narrative	Hours	Amount
05/01/25	NMB	Update main data spreadsheet running trust balance; email to A. Ndwiga confirming receipt of complete inspection report; draft letter to Unit 502,703, and 906 release of delayed possession holdback;	1.30	292.50
05/01/25	PJR	Draft formal offer letter to Intracorp counsel; reporting email to D. Lai and from council members;	0.80	668.00
05/01/25	JDF	Discussion with Peter concerning theory and strategy on additional payment issues and evidence, consider same	0.50	382.50
05/02/25	JDF	Consider form and content of instruction letter and Brook report;	0.70	535.50
05/02/25	PJR	Call from and emails with D. Lai and B. Muk on formal offer; revise same and email to clients;	0.20	167.00
05/05/25	JDF	Further consider Brook report, instruction letter for same, and assessor's evidence and strategy on application;	0.40	306.00
05/09/25	JDF	Further consider Chuck's report, instruction letter, draft and revise same, update Peter on progress and timing of expert report;	1.50	1,147.50
05/12/25	JDF	Further consider expert and lay evidence, need for appraiser, draft, revise and send Chuck's instruction letter and proposed pleadings amendment to Peter, call with Peter concerning same, consider onus argument;	2.00	1,530.00
05/12/25	PJR	Review and revise draft instruction letter to C. Brooks; discussion with Jim Fraser on same;	0.40	334.00
05/12/25	PJR	Emails with R. Mittal on hearing dates and list of documents from Intracorp;	0.10	83.50

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Date	Timekeeper	Narrative	Hours	Amount
05/13/25	JDF	Discussions and e-mails with Peter concerning form and content of amendment to pleadings, implications of same to legal interpretation arguments and supporting expert evidence;	0.60	459.00
05/13/25	PJR	Draft Amended Counterclaim to articulate ejusedem generis pleading;	0.90	751.50
05/14/25	NMB	Draft payout letter enc release of security deposit; obtain lawyer signature;	0.80	180.00
05/14/25	NMB	Email to lawyer obtaining signature on security release payout letters; email to trust providing of the same; prepare delivery package;	0.60	135.00
05/14/25	JDF	Prep call with Chuck to review instruction letter;	0.40	306.00
05/15/25	JDF	Prep and attend call with Chuck concerning instruction letter and form and content of opinion, meetings and e-mails with Peter to review and revise pleadings amendments and strategy;	1.50	1,147.50
05/15/25	PJR	Discussion with Jim Fraser on instructions to Chuck Brook and content of Amended Counterclaim; revise Amended Counterclaim; email to R. Mittal; reporting email to D. Lai.	0.70	584.50
05/16/25	JDF	Further consider Chuck's instructions;	0.40	306.00
05/16/25	NMB	Attend to release of delayed possession; email to owners providing of the same;	0.40	90.00
05/19/25	JDF	Further consider opinion and lay evidence;	0.40	306.00
05/20/25	JDF	Revise Chuck's instructions;	0.40	306.00
05/21/25	JKH	Instructions to Shauna Sigurdson;	0.20	85.00
05/21/25	JDF	Further e-mails with Chuck, consider planning and BCA evidence;	0.40	306.00
05/22/25	NMB	Email to owner responding to query regarding release of security holdback; attend to re-issue of stale dated cheque for investment interest;	0.90	202.50
05/22/25	JKH	Review listed documents for privilege;	0.80	340.00
05/26/25	JDF	Messages with Chuck concerning, prep call on expert opinion status;	0.40	306.00

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Date	Timekeeper	Narrative	Hours	Amount
05/27/25	JDF	Prep and attend call with Chuck Brook concerning status of expert opinion, consider same;	0.60	459.00
05/29/25	JDF	Further consider BCA evidence;	0.30	229.50
05/30/25	SLS	Draft email to Jordan Hayward regarding revised List of Documents with notes; save search criteria (x2); email to Jordan Hayward for review;	0.90	243.00
05/30/25	PJR	Review and assess Intracorp response and affidavit on Joyce Place application; reporting email to D. Lai on same;	1.20	1,002.00
05/30/25	JKH	Review application response and supporting affidavits;	0.10	42.50
05/31/25	JKH	Review listed documents and identity for privilege; email to Shauna Sigurdson on same;	1.90	807.50
Total			22.70	14,041.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
JIM FRASER	JDF	10.50	765.00	8,032.50
JORDAN HAYWARD	JKH	3.00	425.00	1,275.00
NIKKA BORJA	NMB	4.00	225.00	900.00
PETER ROBERTS	PJR	4.30	835.00	3,590.50
SHAUNA SIGURDSON	SLS	0.90	270.00	243.00
				$14,041.00

Taxable Other Charges

Photocopies	18.90

Taxable Disbursements

Courier Services	6.73
Agent Fees	26.00

Total Fees		**$**	**14,041.00**
Disbursements and Other Charges		**$**	**51.63**
Total PST BC		**$**	**982.87**
Total GST		**$**	**704.63**
CURRENT INVOICE DUE:	**CAD**	**$**	**15,780.13**

Outstanding Prior Balance

The contents of this invoice may be subject to solicitor-client privilege. Disclosure of a privileged document to a third party could constitute a waiver of privilege. We recommend that prior to voluntarily sharing the contents of this invoice or providing a copy of it to a tax auditor or other person, that you seek legal advice.

Invoice No.	1314167	12/16/24	$	49,945.97
Invoice No.	1323473	02/18/25	$	35,937.31
Invoice No.	1330179	03/17/25	$	28,092.42
Invoice No.	1335323	04/28/25	$	19,221.29
Invoice No.	1339235	05/19/25	$	12,783.82

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 06/20/25
Invoice No. 1343984
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through May 31, 2025

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1343984

Total Professional Fees		14,041.00
Total Taxable Disbursements and Other Charges		51.63
Total BCPST		982.87
Total GST		704.63
Total Amount Due:	**CAD $**	**15,780.13**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
Royal Bank of Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 1038033
Bank ID: 003 **Transit:** 03215
Swift Code: ROYCCAT2

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:

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

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

REMITTANCE

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 07/18/25
Invoice No. 1349298
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including June 30, 2025, as per attached detail.

Total Professional Fees		$	27,045.50
Total Taxable Disbursements and Other Charges		$	42.60
Total PST BC		$	1,893.19
Total GST		$	1,354.41
Current Invoice Due:	**CAD**	**$**	**30,335.70**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 07/18/25
Invoice No. 1349298
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including June 30, 2025, as follows:

Date	Timekeeper	Narrative	Hours	Amount
06/02/25	PJR	Emails from and calls with D. Lai on report to former council members, draft report to owners and Chuck Brook accounts;	0.20	167.00
06/02/25	JKH	Email update to former Joyce Place owners;	0.20	85.00
06/02/25	JDF	Further consider Chuck's opinion	0.40	306.00
06/03/25	JKH	Review correspondence and amended pleadings from opposing counsel; input plaintiff's list of documents;	0.50	212.50
06/04/25	PJR	Review Intracorp Response to Amended Counterclaim; reporting email to and with D. Lai on same;	0.30	250.50
06/04/25	JDF	Prep call with Chuck Brook on opinion	0.30	229.50
06/04/25	JKH	Email to Peter Roberts regarding document review;	0.10	42.50
06/05/25	PJR	Review affidavit of B. Johnston (Woola); reporting email to D. Lai on same;	0.50	417.50
06/05/25	JDF	Discussions with Chuck and Peter concerning opinion, consider same	0.30	229.50
06/05/25	JKH	Review affidavit #1 of B. Johnston and begin summarizing findings;	1.00	425.00
06/06/25	JKH	Review and summarize affidavit #1 of B. Johnston; email findings to Peter Roberts;	1.50	637.50
06/09/25	PJR	Call with Chuck Brooks to review draft PPA opinion;	1.30	1,085.50
06/10/25	JDF	Further consider Chuck's opinion, BCA evidence;	0.40	306.00

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Date	Timekeeper	Narrative	Hours	Amount
06/10/25	JKH	Email to Ashley Cheng regarding hearing dates; email documents obtained from opposing counsel to Shauna Sigurdson;	0.30	127.50
06/11/25	JDF	Further consider request for BCA evidence, e-mail to Colin Simkus (inhouse BCA counsel)concerning same;	0.50	382.50
06/12/25	JDF	E-mails with Colin Simkus concerning BCA affidavit, further consider form and content of same, strategy in hearing	0.60	459.00
06/13/25	JDF	Further consider BCA evidence	0.40	306.00
06/16/25	PJR	Review and consider draft opinion of Chuck Brooks;	1.50	1,252.50
06/16/25	JDF	Further consider arguments on Chuck's and BCA evidence;	0.60	459.00
06/16/25	JKH	Review instructions from Peter Roberts on affidavit evidence; research and begin drafting affidavit of T. Takagaki;	1.20	510.00
06/17/25	JDF	Further consider strategy and advice, review and revise Chuck's draft report, discuss same with Peter Roberts, review and consider Peter's revisions;	1.40	1,071.00
06/17/25	PJR	Call with Jim Fraser to discuss revisions to C. Brooks draft opinion;	0.40	334.00
06/18/25	PJR	Review and consider combined edits to C. Brooks opinion from Jim Fraser; email to Jim Fraser on same;	0.30	250.50
06/18/25	JKH	Conference with Jim Fraser regarding comparable developments as under Purchase and Sale Agreement; continue drafting affidavit of T. Takagaki;	0.80	340.00
06/18/25	JDF	Review, consider and revise Chuck's opinion, further consider BCA advice and strategy to obtain same, meetings and e-mails with Peter concerning same;	3.30	2,524.50
06/19/25	JDF	Further e-mails and discussions with Peter, e-mails with BCA lawyers concerning assessor's evidence, message to Chuck concerning revisions, consider same;	0.60	459.00

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Date	Timekeeper	Narrative	Hours	Amount
06/19/25	JKH	Research zoning and nature of development on each Comparable Development and incorporate findings into affidavit of T. Takagaki; email correspondence with Shauna Sigurdson and review documents for privilege;	4.00	1,700.00
06/19/25	SLS	Review documents and redact for privilege; review notes from Jordan Hayward; save and email search criteria to Jordan for review; email status to Jordan Hayward; Email from Jordan Hayward with instructions for importing opposing counsel's document production/;; download and copy documents for ingestion: upload documents to database. review upload and OCR documents; save and email search criteria to Jordan Hayward for review.	2.30	621.00
06/20/25	JKH	Continue document review for further redaction; email to Shauna Sigurdson; continue research and drafting on Affidavit #2 of T. Takagaki; research zoning ordinances of six comparable developments; prepare exhibit package;	3.60	1,530.00
06/22/25	JDF	Prep call with Chuck and Peter concerning opinion, further consider strategy to obtain BCA evidence;	0.40	306.00
06/23/25	NMB	Review condition inspection report; prepare payout letter to Unit 902 for release of delayed possession; update main data spreadsheet;	1.20	270.00
06/23/25	JDF	Prep and attend call with Chuck Brook and Peter concerning revisions to opinion, attend call with Peter and Bruce Hallsor concerning affidavit from BC Assessment, consider form and content of same;	1.30	994.50
06/23/25	PJR	Call with Chuck Brook and Jim Fraser on draft opinion; email from and call to B. Hallsor on NBC Assessment evidence;	0.80	668.00
06/23/25	JKH	Continue research on comparable developments; finalize exhibit package; edit affidavit of T. Takagaki; correspondence regarding document production	2.00	850.00
06/23/25	SLS	Review documents for relevance; redact emails for privilege; draft and email status to Jordan Hayward for review; revise Schedule A and Schedule B searches for reviews by Jordan Hayward;	2.70	729.00

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Date	Timekeeper	Narrative	Hours	Amount
06/24/25	JKH	Continue research on comparable developments; edit and send affidavit and exhibit package to Peter Roberts for review and comment; edit affidavit; conduct document review;	3.70	1,572.50
06/24/25	JDF	Further consider, draft, revise and discuss BCA affidavit with Peter, e-mails with Bruce Hallsor concerning same	1.50	1,147.50
06/24/25	PJR	Discussion with Jim Fraser on BC Assessment evidence; review and revise draft affidavit of Julie Si; email to B. Hallsor on same;	0.70	584.50
06/24/25	PJR	Review and revise draft Takagaki affidavit and instructions to Jordan Hayward;	0.20	167.00
06/24/25	SLS	Email from Jordan Hayward regarding instructions to rerun production; rerun production; quality control of document production; Email to Jordan Hayward regarding documents;	1.90	513.00
06/25/25	JDF	Discussions with Peter and Jordan concerning valuation issues, strategy, consider same;	0.60	459.00
06/25/25	JKH	Conduct document review; conduct historical research into Joyce Place zoning; conference with Jim Fraser regarding comparable developments;	1.80	765.00
06/25/25	SLS	Conference with Jordan Hayward; Email to Peter Roberts regarding relevance of documents; copy and upload documents to filesend site; email form of revised List of Documents and Schedules along with filesend for service;	0.50	135.00
06/26/25	NMB	Attend to payout to Unit 902 release of delayed possession; email to owner providing of the same;	0.30	67.50
06/26/25	JDF	E-mails with Bruce Hallsor and Peter concerning choice of BC Assessment affidavit, consider same, further consider Chuck's opinion;	0.40	306.00
06/26/25	JKH	Correspondence on document disclosure; finalize amended list of documents and correspondence letter and send to opposing counsel;	0.50	212.50
06/27/25	JDF	E-mails with Chuck and Peter, further consider evidence issues and strategy;	0.40	306.00
06/27/25	JKH	Revise exhibit package of T. Takagaki;	0.10	42.50

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Date	Timekeeper	Narrative	Hours	Amount
06/30/25	JDF	Further consider strategy on BCA affidavit;	0.30	229.50
Total			50.10	27,045.50

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
JIM FRASER	JDF	13.70	765.00	10,480.50
JORDAN HAYWARD	JKH	21.30	425.00	9,052.50
NIKKA BORJA	NMB	1.50	225.00	337.50
PETER ROBERTS	PJR	6.20	835.00	5,177.00
SHAUNA SIGURDSON	SLS	7.40	270.00	1,998.00
				$27,045.50

Taxable Other Charges

Photocopies	30.60

Taxable Disbursements

Jordan Hayward - View File - VLC-S-S-097312 None,CSO Invoice #:	4.50
Jordan Hayward - View Document - VLC-S-S-097312 None,CSO Invoice	4.50
BC Online Service Charge	3.00

Total Fees		**$ 27,045.50**
Disbursements and Other Charges		**$ 42.60**
Total PST BC		**$ 1,893.19**
Total GST		**$ 1,354.41**
CURRENT INVOICE DUE:	**CAD**	**$ 30,335.70**

Outstanding Prior Balance

Invoice No.	1314167	12/16/24	$ 49,945.97
Invoice No.	1323473	02/18/25	$ 35,937.31
Invoice No.	1330179	03/17/25	$ 28,092.42
Invoice No.	1335323	04/28/25	$ 19,221.29
Invoice No.	1339235	05/19/25	$ 12,783.82
Invoice No.	1343984	06/20/25	$ 15,780.13

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 07/18/25
Invoice No. 1349298
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through June 30, 2025

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1349298

Total Professional Fees		27,045.50
Total Taxable Disbursements and Other Charges		42.60
Total BCPST		1,893.19
Total GST		1,354.41
Total Amount Due:	**CAD $**	**30,335.70**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
Royal Bank of Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 1038033
Bank ID: 003 **Transit:** 03215
Swift Code: ROYCCAT2

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:
Lawson Lundell LLP
Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

REMITTANCE

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 08/18/25
Invoice No. 1353553
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including July 31, 2025, as per attached detail.

Total Professional Fees		$	23,201.50
Total Taxable Disbursements and Other Charges		$	23.20
Total PST BC		$	1,624.11
Total GST		$	1,161.24
Current Invoice Due:	**CAD**	**$**	**26,010.05**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 08/18/25
Invoice No. 1353553
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including July 31, 2025, as follows:

Date	Timekeeper	Narrative	Hours	Amount
07/02/25	JDF	Further consider source and timing of BCA affidavit, prep and attend call with C. Brook and Peter Roberts, post-call consideration of revisions to C. Brook's scope of opinion and instructions	1.70	1,300.50
07/02/25	PJR	Call with C. Brook to review and discuss draft PPA expert opinion;	0.60	501.00
07/02/25	JKH	Phone call with City of Vancouver records office; revise affidavit #2 of T. Takagaki;	0.70	297.50
07/03/25	PJR	Review and consider revised opinion letter to C. Brook; emails with Jim Fraser on same; instructions to Jordan Hayward on Notice to Admit; email to B. Hallsor on BC Assessment affidavit;	0.40	334.00
07/03/25	JDF	Consider, draft, revise updated instructions for C. Brook, e-mails and discussions with Peter Roberts concerning same and concerning expediting of BCA affidavit, e-mails with B. Hallsor concerning same;	1.20	918.00
07/03/25	JKH	Research and draft Notice to Admit;	1.00	425.00
07/04/25	JDF	Prepare and attend call with C. Brook and Peter Roberts concerning revised instructions and response, further revisions to instructions and e-mails with Peter Roberts concerning same, e-mail same to C. Brook;	1.10	841.50
07/04/25	PJR	Email from and to G. Palm on costs issues; reporting email to D. Lai on same;	0.10	83.50
07/04/25	PJR	Call with C. Brook on revised opinion sought; revise revised Opinion Sought Questions; discussion with Jim Fraser on same;	0.90	751.50

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Date	Timekeeper	Narrative	Hours	Amount
07/04/25	JKH	Correspondence with the City of Vancouver records office regarding historical zoning information on property;	0.40	170.00
07/07/25	JDF	Further consider C. Brook's opinion;	0.30	229.50
07/08/25	NMB	Update main data spreadsheet; draft letter releasing deposit holdback; correspondence with property manager;	1.80	405.00
07/08/25	JDF	E-mails with C. Brook and Peter Roberts concerning call to review C. Brook's revisions, further consider C. Brook's and BCA evidence;	0.60	459.00
07/08/25	PJR	Revise material for New West hearing; email to R. Mittal on hearing date and consent order; reporting email to D. Lai on same; emails with D. Lai on draft report to owners;	0.40	334.00
07/08/25	JKH	Phone call with the City of Vancouver;	0.20	85.00
07/09/25	SLS	Conference with Jordan Hayward; email from Jordan Hayward; review documents; draft and email Peter Roberts regarding documents;	0.50	135.00
07/09/25	JKH	Review email regarding document disclosure from R. Mittal; phone call with T. Tran and email on same; continue drafting Notice to Admit;	1.40	595.00
07/10/25	JDF	Further consider C. Brook's opinion, status of GVWD bylaw, prepare for call with C. Brook concerning same;	0.40	306.00
07/10/25	JKH	Correspondence with Metro Vancouver regarding Greater Vancouver Water District's Development Cost Charge Bylaws; continue drafting Notice to Admit; conference with Jim Fraser;	0.70	297.50
07/11/25	PJR	Call with C. Brook to discuss revised report; review email from R. Mittal on email disclosure and assess issue; emails with and call to D. Lai on same (LIQ0027-0001); email to R. Mittal on LIQ0027-0001;	1.30	1,085.50
07/11/25	JKH	Phone call with Metro Vancouver; email to Stef Alexsandru;	0.30	127.50

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Date	Timekeeper	Narrative	Hours	Amount
07/11/25	JDF	Prepare and attend call with C. Brook, Peter Roberts and Jordan Hayward concerning C. Brook's opinion, post call consideration of implications of bylaw 353 not being in force, e-mails with Jordan concerning status of bylaw 353, e-mails with B, Hallsor concerning BCA position on affidavit evidence, consider implications of same;	1.30	994.50
07/13/25	JDF	Further consider response to B. Hallsor affidavit proposal, implication to C. Brook's opinion of bylaw 353 not having been adopted and in force;	0.40	306.00
07/14/25	NMB	Review email from client regarding plumbing fees;	0.20	45.00
07/14/25	JDF	Further consider, discussion with Peter Roberts concerning implications of and next steps / strategy on BCA evidence and of lack of approval of bylaw on C. Brook's evidence, e-mails with B. Hallsor concerning affidavit meeting;	0.80	612.00
07/14/25	PJR	Email from and to B. Hallsor on BC Assessment evidence;	0.20	167.00
07/14/25	JKH	Correspondence with the City of Vancouver records office; email to Peter Roberts;	0.70	297.50
07/15/25	NMB	Update main data spreadsheet; draft letter to Unit 402 regarding release of holdback and Intracorp regarding plumbing fees; email lawyer obtaining signature of the same and confirmation of funds;	2.70	607.50
07/15/25	JDF	Further consider BCA evidence, e-mails with B. Hallsor concerning same, receive and preliminary review of C. Brook's revised opinion;	0.60	459.00
07/15/25	PJR	Review and revise T. Takagaki affidavit; instructions to Jordan Hayward on same;	0.30	250.50
07/15/25	JKH	Review correspondence from opposing counsel;	0.20	85.00
07/15/25	LAF	E-sign letters and correspondence regarding release of delayed possession deposit;	0.20	123.00
07/16/25	PJR	Review letter from R. Mittal and Affidavit #1 of T. Chapman; instructions to Jordan Hayward on document review and reply evidence; review file and email to D. Lai on Champan #1 and reply evidence;	0.60	501.00

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Date	Timekeeper	Narrative	Hours	Amount
07/16/25	JDF	Review C. Brook's revised draft opinion, coordinate interview of BCA witness, prepare same, call with Peter Roberts concerning same;	1.00	765.00
07/16/25	JKH	Revise affidavit and exhibit package of T. Takagaki; email on same; receive instruction from Peter Roberts on document review;	1.30	552.50
07/17/25	NMB	Attend to payout to Unit 404 and Intracorp; email to owner and client providing of the same; update main data spreadsheet;	1.10	247.50
07/17/25	PJR	Emails and call with G. Palm on Liquidator fees and timing;	0.10	83.50
07/17/25	JKH	Emails regarding affidavit revisions;	0.20	85.00
07/18/25	JDF	Further prepare for BCA call, consider C. Brook's opinion revisions;	0.40	306.00
07/18/25	JKH	Phone call with T. Takagaki; review email from opposing counsel regarding document demand;	0.60	255.00
07/20/25	JKH	Correspondence regarding Metro Vancouver Bylaws;	0.30	127.50
07/21/25	NMB	Update main dataspreadsheet;	0.40	90.00
07/21/25	JKH	Review meeting minutes and details of bylaw No. 353, 2022 for inclusion in notice to admit;	0.30	127.50
07/21/25	JDF	Prepare and attend call with B. Hallsor concerning scope and focus of Assessor's evidence, further consider same, further consider revisions to Chuck's evidence, e-mails with Peter Roberts	1.30	994.50
07/22/25	NMB	Draft Unit 702 release of delayed possession holdback;	0.40	90.00
07/22/25	JDF	Further consider expert evidence;	0.40	306.00
07/23/25	JDF	Further review and revise C. Brook's opinion, consider content and form of BCA affidavit, strategy in arguments;	1.80	1,377.00
07/23/25	JKH	Correspondence on file matters; review additional Metro Vancouver meeting minutes to determine if a by law was put into effect; revise Notice to Admit accordingly; phone call with former tenant of Joyce Place regarding payment status	1.50	637.50

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Date	Timekeeper	Narrative	Hours	Amount
07/24/25	JDF	Further consider, revise C. Brook's opinion, discussions and e-mails with Jordan Hayward, Jane Mayfield and Samantha Andison concerning GVWD Bylaw adoption, e-mails with Peter Roberts concerning opinion issues, further consider Assessor affidavit scope;	1.30	994.50
07/24/25	SEA	Discussion with Jordan Hayward regarding DCC bylaw issue; locate signed DCC bylaw; send same to Jim Fraser and Jordan Hayward;	0.50	137.50
07/26/25	JKH	Revise affidavit #2 of T. Takagaki; revise Notice to Admit; email both for review;	1.30	552.50
07/28/25	JDF	E-mails and discussion with Jordan Hayward concerning implications of potential error in unit numbers used to calculate price supplement, strategy to resolve same;	0.40	306.00
07/28/25	JKH	Conference with Jim Fraser; correspondence with T. Takagaki	0.30	127.50
07/29/25	JDF	Further consider expert evidence;	0.40	306.00
07/30/25	JDF	Further consider expert evidence, follow-up e-mail with B. Hallsor concerning same;	0.40	306.00
07/30/25	JKH	Correspondence with T. Takagaki regarding outstanding Joyce Place billing issues;	0.30	127.50
07/31/25	JKH	Correspondence on outstanding Joyce Place bills;	0.40	170.00
Total			40.60	23,201.50

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
JIM FRASER	JDF	15.80	765.00	12,087.00
JORDAN HAYWARD	JKH	12.10	425.00	5,142.50
LISA FREY	LAF	0.20	615.00	123.00
NIKKA BORJA	NMB	6.60	225.00	1,485.00
PETER ROBERTS	PJR	4.90	835.00	4,091.50
SAMANTHA ANDISON	SEA	0.50	275.00	137.50
SHAUNA SIGURDSON	SLS	0.50	270.00	135.00
				$23,201.50

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Taxable Other Charges

Photocopies	16.20

Taxable Disbursements

Ashley Cheng - CSO Invoice #: 1513620162 None	5.50
BC Online Service Charge	1.50

Total Fees		**$ 23,201.50**
Disbursements and Other Charges		**$ 23.20**
Total PST BC		**$ 1,624.11**
Total GST		**$ 1,161.24**
CURRENT INVOICE DUE:	**CAD**	**$ 26,010.05**

Outstanding Prior Balance

Invoice No.	1314167	12/16/24	$ 49,945.97
Invoice No.	1323473	02/18/25	$ 35,937.31
Invoice No.	1330179	03/17/25	$ 28,092.42
Invoice No.	1335323	04/28/25	$ 19,221.29
Invoice No.	1339235	05/19/25	$ 12,783.82
Invoice No.	1343984	06/20/25	$ 15,780.13
Invoice No.	1349298	07/18/25	$ 30,335.69

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 08/18/25
Invoice No. 1353553
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through July 31, 2025

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1353553

Total Professional Fees		23,201.50
Total Taxable Disbursements and Other Charges		23.20
Total BCPST		1,624.11
Total GST		1,161.24
Total Amount Due:	**CAD $**	**26,010.05**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
Royal Bank of Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 1038033
Bank ID: 003 **Transit:** 03215
Swift Code: ROYCCAT2

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:
Lawson Lundell LLP
Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

REMITTANCE

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 09/25/25
Invoice No. 1356203
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including August 31, 2025, as per attached detail.

Total Professional Fees		$	24,456.50
Total Taxable Disbursements and Other Charges		$	156.90
Total Exempt Disbursements and Other Charges		$	288.38
Total PST BC		$	1,711.96
Total GST		$	1,230.67
Current Invoice Due:	**CAD**	**$**	**27,844.41**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 09/25/25
Invoice No. 1356203
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including August 31, 2025, as follows:

Date	Timekeeper	Narrative	Hours	Amount
08/01/25	JDF	Further consider, send revisions to C. Brook, e-mails with Chuck concerning Teams call to discuss same, prep call;	0.40	306.00
08/01/25	JKH	Conduct document review of plaintiff's documents and begin preparing assessment of same;	3.20	1,360.00
08/03/25	JDF	Prep call with C. Brook;	0.40	306.00
08/04/25	JKH	Review affidavit and Notice to Admit; email Notice to Admit to Peter Roberts for review and comment; inquiry into necessity of further research;	0.50	212.50
08/05/25	JDF	Prep and attend call with Chuck to revise opinion; call with Jordan Hayward and Ed Wilson concerning source of strata units used in additional payment calculation for notice to admit; consider strategy on same;	1.00	765.00
08/05/25	NMB	Update letter to Unit 702 regarding release of holdback and main data spreadsheet; email to paralegal providing of the same and vacation notes for file reference;	0.50	112.50
08/05/25	JKH	Phone call with Jim Fraser and Ed Wilson;	0.40	170.00
08/06/25	JDF	Further consider expert evidence;	0.40	306.00
08/06/25	JDF	Further consider Chuck's evidence and strategy on arguments;	0.30	229.50
08/06/25	JKH	Correspondence with client regarding domain status;	0.20	85.00
08/07/25	JDF	E-mails with B. Hallsor concerning status and timing of Assessor's affidavit; further consider strategy on arguments;	0.40	306.00

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Date	Timekeeper	Narrative	Hours	Amount
08/08/25	JKH	Continue review of plaintiff's documents;	3.20	1,360.00
08/08/25	JDF	Further consider expert evidence;	0.30	229.50
08/09/25	JKH	Continue reviewing plaintiff's list of documents; prepare notes on each and consider grounds for order under Rule 7(10-11) for additional document disclosure;	1.10	467.50
08/11/25	JKH	Conference with Peter Roberts about plaintiff's list of documents and next steps; draft demand letter to plaintiff's counsel for additional document disclosure;	2.00	850.00
08/12/25	PJR	Review and revise letter to Intracorp counsel on additional document disclosure;	0.10	83.50
08/12/25	JKH	Revise demand letter to opposing counsel; email to Peter Roberts for review and comment;	0.60	255.00
08/13/25	JKH	Conference with Peter Roberts regarding additional document disclosure request from plaintiff's counsel; email to client on same; begin document review for Amended List of Documents;	1.20	510.00
08/14/25	NMB	Email to property manager confirming receipt of condition report and update on Unit 704 occupancy fees; update main data spreadsheet; prepare release of holdback payout letter to Unit 504; email to senior paralegal regarding notes on release;	1.60	360.00
08/14/25	JKH	Instructions to Linda Bourcier; conduct document review;	0.30	127.50
08/14/25	LSD	Review file and consider location of original data; email to Jordan Hayward regarding same; arrange for data transfer to Jordan Hayward Z drive for review;	0.50	127.50
08/15/25	JDF	Call with C. Brook concerning opinion, review of BCA affidavit;	0.50	382.50
08/18/25	PJR	Emails with R. Mittal on discoveries; call with D.Lai and B. Muk on same; call with H. Buck on Intracorp dealings; consider review and revise draft Notice to Admit and T. Tagaki #1 affidavit; instructions to Jordan Hayward on same;	0.50	417.50
08/18/25	JKH	Continue document review; instructions to Shauna Sigurdson;	1.40	595.00

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Date	Timekeeper	Narrative	Hours	Amount
08/18/25	NMB	Email to lawyer obtaining further instructions regarding release of funds; update main data spreadsheet; attend to release of holdback Unit 704 and 502;	1.60	360.00
08/18/25	JDF	E-mails with Peter Roberts et al concerning expert evidence; discussion with Peter Roberts concerning same;	0.40	306.00
08/18/25	LAF	Sign letters for deposit release;	0.10	61.50
08/18/25	SLS	Email from Jordan Hayward; conference with Jordan Hayward regarding request made by opposing counsel for further production; review letter and pleadings for review; conduct list of key words; create issues tags related to request made by opposing counsel for further production;	1.20	324.00
08/19/25	JKH	Instructions and correspondence with Shauna Sigurdson regarding additional document disclosure; research and revise Notice to Admit; research and begin revising Affidavit #2 of Tetsu Takagaki in respect of comparable developments;	4.50	1,912.50
08/19/25	SLS	Create searches based on key words related to the requests made by opposing counsel; review documents and tag with related issues; save search criteria; draft status update to Jordan Hayward related to further production;	2.00	540.00
08/20/25	PJR	Email from and to R. Mittal on D. Lai discovery; emails with D. Lai on same; draft liquidator's reporting letter to owners; letter and appointment to R. Mittal on discovery of Intracorp representative; instruction to Jordan Hayward; review and revise website update;	0.80	668.00
08/20/25	JKH	Instruction to Kevin Bahng on website revisions; draft update to website and send to Peter Roberts; conduct research on comparable developments; conference with Shauna Sigurdson and conduct document review;	5.10	2,167.50
08/20/25	SLS	Create searches based on key words related to the requests made by opposing counsel; review documents and tag with related issues; save search criteria (x7) and email to Jordan Hayward for review; draft instructions to Jordan Hayward related to review of further production;	1.90	513.00

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Date	Timekeeper	Narrative	Hours	Amount
08/21/25	JKH	Phone call with Kevin Bhang to revise website; send update to former owners; conduct document review; correspondence with Shauna Sigurdson; continue research on comparable developments; revise Notice to Admit; review amended list of documents;	3.40	1,445.00
08/21/25	SLS	Save search criteria (x6) and email to Jordan Hayward for review; draft instructions to Jordan Hayward related to review of further production; Index documents in preparation for production of List of Documents; Create pdf production set of the liquidator's producible records to send to opposing counsel;	2.70	729.00
08/22/25	JKH	Email Revised List of Documents to Peter Roberts for review and comment; revise Notice to Admit;	0.40	170.00
08/22/25	SLS	Email from Jordan Hayward regarding Amended List of Documents; email Peter Roberts Schedules and Amended List of Documents for review;	0.20	54.00
08/22/25	LAF	Email to J. Hayward regarding calculations;	0.20	123.00
08/24/25	JDF	E-mails with Chuck concerning revision of expert opinion, consider same;	0.40	306.00
08/25/25	PJR	Review and provide instructions about Amended List of Documents of Liquidator;	0.10	83.50
08/25/25	JKH	Finalize and deliver Amended List of Documents and cover letter to opposing counsel; email Notice to Admit and Schedule of Documents to Peter Roberts for review and comment;	0.60	255.00
08/26/25	JDF	Further consider expert evidence;	0.30	229.50
08/26/25	JKH	Instructions to and correspondence with E. Cornelius on research;	0.40	170.00
08/27/25	ECC	Research numbers of units in various strata buildings for Jordan Hayward;	0.40	72.00
08/27/25	JMS	Review schedule; obtain copies of various strata plans and related unit entitlements;	1.20	378.00
08/27/25	JKH	Instructions to Shauna Sigurdson; review research on comparable developments; email to Jillian Sych to pull strata plans; conference with Peter Roberts;	1.00	425.00
08/28/25	JKH	Email correspondence with clients;	0.20	85.00

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Date	Timekeeper	Narrative	Hours	Amount
08/28/25	SLS	Email from Cassels requesting documents and load files; review load files and documents; copy and upload to filesend site and email to Cassels as requested;	0.40	108.00
08/29/25	JKH	Review strata plans and schedule of unit entitlements for Comparable Developments; revise affidavit #2 of T. Takagaki; email draft to Peter Roberts for review;	2.70	1,147.50
08/31/25	JDF	Further consider expert evidence;	0.30	229.50
08/31/25	PJR	Review file and draft D. Lai #2;	2.00	1,670.00
Total			55.50	24,456.50

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
EMMA CORNELIUS	ECC	0.40	180.00	72.00
JILLIAN SYCH	JMS	1.20	315.00	378.00
JIM FRASER	JDF	5.10	765.00	3,901.50
JORDAN HAYWARD	JKH	32.40	425.00	13,770.00
LINDA BOURCIER	LSD	0.50	255.00	127.50
LISA FREY	LAF	0.30	615.00	184.50
NIKKA BORJA	NMB	3.70	225.00	832.50
PETER ROBERTS	PJR	3.50	835.00	2,922.50
SHAUNA SIGURDSON	SLS	8.40	270.00	2,268.00
				$24,456.50

Taxable Other Charges

Photocopies	26.10
Colour Photocopies	3.00
QL System Searches	90.00

Non-Taxable Disbursements

LTSA Services (E)	282.08
Library Services	6.30

Taxable Disbursements

LTSA Service Charge	37.80

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Total Fees		**$ 24,456.50**
Disbursements and Other Charges		**$ 445.28**
Total PST BC		**$ 1,711.96**
Total GST		**$ 1,230.67**
CURRENT INVOICE DUE:	**CAD**	**$ 27,844.41**

Outstanding Prior Balance

Invoice No.	1314167	12/16/24	$	49,945.97
Invoice No.	1323473	02/18/25	$	35,937.31
Invoice No.	1330179	03/17/25	$	28,092.42
Invoice No.	1335323	04/28/25	$	19,221.29
Invoice No.	1339235	05/19/25	$	12,783.82
Invoice No.	1343984	06/20/25	$	15,780.13
Invoice No.	1349298	07/18/25	$	30,335.69
Invoice No.	1353553	08/18/25	$	26,010.04

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 09/25/25
Invoice No. 1356203
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through August 31, 2025

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1356203

Total Professional Fees		24,456.50
Total Taxable Disbursements and Other Charges		156.90
Total Exempt Disbursements and Other Charges		288.38
Total BCPST		1,711.96
Total GST		1,230.67
Total Amount Due:	**CAD $**	**27,844.41**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
Royal Bank of Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 1038033
Bank ID: 003 **Transit:** 03215
Swift Code: ROYCCAT2

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:
Lawson Lundell LLP
Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

REMITTANCE

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 10/24/25
Invoice No. 1359230
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including September 30, 2025, as per attached detail.

Total Professional Fees		$	78,029.50
Total Taxable Disbursements and Other Charges		$	1,786.68
Total Exempt Disbursements and Other Charges		$	10.89
Total PST BC		$	5,462.06
Total GST		$	3,990.81
Current Invoice Due:	**CAD**	**$**	**89,279.94**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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PAYMENT IS DUE UPON RECEIPT OF INVOICE
INTEREST ON OVERDUE ACCOUNTS WILL BE CHARGED 12% PER ANNUM
GST #R115124141

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 10/24/25
Invoice No. 1359230
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including September 30, 2025, as follows:

Date	Timekeeper	Narrative	Hours	Amount
09/02/25	PJR	Review and revise T. Takagaki affidavit; instructions to Jordan Hayward; emails with D. Lai; review Intracorp documents and prepare for discovery of E. Allegretto;	1.80	1,503.00
09/02/25	JDF	Discussions with Jordan Haywood and Peter Roberts concerning unit entitlement confirmation and expert evidence reliance on same, status of C. Brook's opinion;	0.30	229.50
09/02/25	JKH	Finalize affidavit and exhibit package and email to T. Takagaki for review and comment;	0.50	212.50
09/02/25	SLS	Conference with Peter Roberts regarding document review; save and email search criteria to Peter Roberts for review; provided requested documents to Peter Roberts for witness preparation; prepare witness binder for Peter Roberts review;	1.60	432.00
09/03/25	PJR	Preparation for Allegretto discovery; calls with H. Buck, S. Hamilton and B. Muk on disclosure issues to Intracorp; review and revise Notice to Admit; instructions to Jordan Hayward;	2.80	2,338.00
09/03/25	JKH	Review lists of documents for meeting minutes that predate January 2021; emails with Shauna Sigurdson on same; phone call with T. Takagaki regarding affidavit; edit Notice to Admit; correspondence with Peter Roberts; instructions to Azadeh Samimi;	1.20	510.00
09/03/25	JDF	Further consider strategy on expert evidence;	0.30	229.50
09/03/25	SLS	Emails from/to Peter Roberts regarding witness preparation binders; review database; email to/from Jordan Hayward; email documents to Peter Roberts for review;	1.20	324.00

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Date	Timekeeper	Narrative	Hours	Amount
09/04/25	JDF	Emails and call with Peter Roberts concerning settlement offer, interplay with expert evidence, consider same;	0.40	306.00
09/04/25	PJR	Meet with D. Lai to prepare for discoveries; return telephone call to R. Mittal on settlement offer form Intracorp.; review and revise amended LOD; emails with J. Darling and review documents from Colliers; prepare for discovery of E. Allegretto; email form R. Mittal on offer; call and emails with D. Lai, B. Muk and others on same; email to R. Miittal on B. Munro affidavit;	2.10	1,753.50
09/04/25	JKH	Instructions to Azadeh Samimi regarding Notice to Admit; prepare for and attend preparation meeting on examination for discovery; review documents and prepare further amended list of documents for disclosure; email to D. Lai; finalize amended list and disclosure letter and prepare for delivery to opposing counsel;	3.10	1,317.50
09/04/25	SLS	Email from Peter Roberts and Jordan Hayward with instructions for document production/review; download and copy documents for ingestion: upload documents to database (x4), review upload and OCR documents; save and email search criteria to Peter Roberts for review; draft form of Amended List of Documents; revision Schedule A-2 to add additional documents; run production for additional documents; edit load files; Copy and upload production to filesend site for review and distribution for review by Peter Roberts and Jordan Hayward; instructions from Peter Roberts for serving Amended List of Documents; draft and email Cassels serving Amended List of Documents along with copies of documents; email Amended List of Documents and documents to client for review;	3.30	891.00
09/05/25	JDF	Further review C. Brook's revisions, arrange meeting with C. Brook to review same, prep same, further consider settlement advice;	1.60	1,224.00
09/05/25	JXK	Prepare prejudgment interest calculation; email to Peter Roberts regarding same;	0.20	50.00
09/05/25	JKH	Phone call with T. Takagaki; phone call with Jillian Sych; email to Jillian Sych to arrange meeting with T. Takagaki to walk through unit entitlement searches on LSTA website; prepare for and attend meeting with former Strata Counsel;	1.30	552.50

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Date	Timekeeper	Narrative	Hours	Amount
09/05/25	PJR	Call with D. Lai and strata council members on Intracorp offer; prepare for discovery of E. Allegretto; email from B. Muk;	2.20	1,837.00
09/05/25	JMS	Discussion with J. Hayward regarding affidavit; telephone call to T. Takagaki regarding access of unit entitlement from LTSA;	0.30	94.50
09/05/25	SLS	Emails from Peter Roberts with document requests for examination for discovery preparation; conference with Peter Roberts with document request for examination for discovery preparation; prepare and finalize witness binders for Peter Roberts (x2);	2.30	621.00
09/06/25	PJR	Email from B. Muk on counter-offer; draft counter offer to Intracorp and email D. Lai and former strata council members on same; prepare for examination for discovery of E. Allegretto;	3.50	2,922.50
09/06/25	JKH	Review settlement offer from Peter Roberts;	0.10	42.50
09/07/25	JDF	Prepare meeting with C. Brook, further consider settlement value recommendation;	0.30	229.50
09/08/25	JDF	Further preparation and attend meeting with C. Brook to revise opinion, further consider settlement strategy;	1.40	1,071.00
09/08/25	PJR	Prepare for and attend discovery of E. Allegretto; emails with D. Lai and former strata council members on draft offer and Density Bonus; telephone call to D. Lai on Intracorp examination for discovery; settlement discussion with and email to R. Mittal with offer; telephone call from H. Buck on PPA calculation and E. Allegretto discovery;	3.60	3,006.00
09/08/25	JMS	Update data spreadsheet;	0.30	94.50
09/08/25	JKH	Prepare for and attend examination for discovery of representative of Intracorp; review email from opposing counsel regarding offer to settle; draft and file internal memorandum regarding outstanding requests made by Lawson Lundell in the course of the examination for discovery of E. Allegretto; email to D. Lai; phone call with Peter Roberts; review purchase and sale agreement and begin recalculation of purchase price adjustment value;	4.40	1,870.00

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Date	Timekeeper	Narrative	Hours	Amount
09/08/25	NMB	Review received condition report from property manager; email to lawyer obtaining further instruction re delayed deposit holdback;	0.60	135.00
09/09/25	JXK	Prepare prejudgment interest calculations; email to Peter Roberts regarding same;	0.20	50.00
09/09/25	NMB	Meeting with lawyer regarding matter; email to lawyer providing of the list of occupied units; update main data spreadsheet;	1.00	225.00
09/09/25	PJR	Review PPA calculations; emails from H. Buck on same; attend examination for discovery of D. Lai;	5.00	4,175.00
09/09/25	JDF	Further consider settlement strategy;	0.30	229.50
09/09/25	JKH	Attend examination for discovery of D. Lai; correspondence with Peter Roberts regarding aggregate values of comparable developments; conference with Lisa Frey;	5.90	2,507.50
09/09/25	ELW	Call with Lisa Frey regarding possession issues;	0.20	165.00
09/09/25	LAF	Email to remaining owners regarding ending of delayed possession period;	0.30	184.50
09/10/25	JDF	Discussions and emails with Peter Roberts,, Jordan Haywood, and B. Hallsor concerning BC assessment of Comparable Developments;	1.70	1,300.50
09/10/25	JKH	Conference with Jim Fraser regarding obtaining revised BC Assessment values for comparable developments; conference with Lisa Frey on same; email to opposing counsel following up on request for Amended List of Documents; transcribe outstanding request made at examination for discovery of D. Lai and file document;	2.10	892.50
09/10/25	LAF	Various correspondence with delayed possession owners regarding move out;	0.60	369.00
09/10/25	LAF	Meeting with Jordan Hayward regarding Joyce Place assessment;	0.30	184.50
09/11/25	JDF	Discussions and e-mails with Peter Roberts, review Peter Roberts' revisions to C. Brook's opinion, consider own revisions to same, call with C. Brook concerning same and prep meeting to review and revise opinion;	1.40	1,071.00

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Date	Timekeeper	Narrative	Hours	Amount
09/11/25	PJR	Review and revise draft C. Brook report; comments to Jim Fraser;	1.20	1,002.00
09/11/25	NMB	Review and receive complete moveout inspection report from property manager;	0.30	67.50
09/12/25	NMB	Confirm receipt of condition inspection report from property manager;	0.30	67.50
09/12/25	JKH	Conference with Jim Fraser regarding status of B.C. Assessment information on comparable developments; review reporting email from Peter Roberts to client and strata counsel enclosing report from C. Brook;	0.10	42.50
09/12/25	PJR	Review C. Brook's report; reporting email to D. Lai and former council;	0.40	334.00
09/12/25	JDF	Prepare and attend meeting with C. Brook to revise and finalize report; discussion with Peter Roberts concerning same, further consider settlement strategy and advice;	1.50	1,147.50
09/15/25	JDF	Discussion with Jordan Haywood concerning calculation parameters;	0.20	153.00
09/15/25	JKH	Conference with Peter Roberts and Jim Fraser regarding applicable units in Wall Central Park for inclusion in BC Assessment;	0.40	170.00
09/16/25	PJR	Emails with R. Mittal on Intracorp offer; reporting email to D. Lai;	0.20	167.00
09/16/25	JDF	Further consider price adjustment clause data and settlement advice;	0.40	306.00
09/16/25	JKH	Instructions to Jade Tsui; revise affidavit #2 of T. Takagaki and email confirming time to swear affidavit; finalize affidavit package and instructions to Azadeh Samimi; review settlement email from opposing counsel; email correspondence with T. Takagaki to schedule time to commission affidavit; receive and review amanded list of plaintiff's documents;	4.00	1,700.00
09/16/25	NMB	Email to property manager regarding Unit 302 Condition Inspection Report; review received inspection report;	0.50	112.50

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Date	Timekeeper	Narrative	Hours	Amount
09/16/25	SLS	Email from Jordan Hayward from documents produced by Cassels;	0.20	54.00
09/17/25	AMW1	Commission affidavit of T. Takagaki;	0.60	165.00
09/17/25	JXK	Prepare spreadsheet of 2021 and 2023 BC Assessments for six strata lots; conference with and email to Jordan Hayward regarding same;	1.70	425.00
09/17/25	JDF	Review and consider implications of BCA assessments of strata plans, discussions and e-mails with Peter Roberts and Jordan Haywood concerning same, e-mails with B. Hallsor concerning same, further consider settlement strategy;	1.00	765.00
09/17/25	JKH	Conference with Lisa Frey regarding Wall Central Park as Comparable Development under purchase and sale agreement; continue to review plaintiff's list of amended documents; conference with Jim Fraser and Peter Roberts regarding BC Assessment information; instructions to Jas King regarding excel spreadsheet; conference with Jim Fraser regarding BC Assessment information; draft table of BC Assessment information compared with unit entitlements and deliver to Jim Fraser;	4.10	1,742.50
09/17/25	PJR	Call with D. Lai on Intracorp offer, Sept 26 application and preparing PPA application material; draft notice of application for payment of PPA; review BC Assessment data from BC Assessment and instructions to Jas King and Jordan Hayward on same;	2.60	2,171.00
09/17/25	LAF	Brief discussion with J. Hayward re purchase price adjustment;	0.40	246.00
09/18/25	JDF	Discussions with Jordan Haywood, Peter Roberts, and Jas King concerning reconciliation of assessments with calculation of price adjustment , message and e-mail to B. Hallsor, concerning same, further consider same;	0.80	612.00
09/18/25	JKH	Continue reviewing plaintiff's Amended List of Documents; email to Peter Roberts reporting on findings;	3.80	1,615.00

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Date	Timekeeper	Narrative	Hours	Amount
09/18/25	SLS	Email from Cassels' document production/review; download and copy documents for ingestion: upload documents to database. review upload and OCR documents; conduct quality control of Cassel's production;	1.10	297.00
09/19/25	JXK	Meeting with Jordan Hayward and Jim Fraser regarding 2021 and 2023 assessed values; revise assessment chart; meeting with B. Hallsor and J. Hadley regarding clarification of assessments;	4.30	1,075.00
09/19/25	JMS	Discussions regarding values received from BC Assessment;	0.40	126.00
09/19/25	JKH	Receive and review revised unit assessments from BC Assessor; conference with Jim Fraser and Jas King on calculations of comparable developments and outstanding information required from assessor; attend meeting with B. Hallsor and J. Hadley from BC Assessor's office; email summary to Peter Roberts; review assessment spreadsheet and calculations provided by assessor;	3.10	1,317.50
09/19/25	PJR	Instructions on BC Assessment calculations and supporting evidence; review BC Assessments and do PPA calculation; reporting emial to D. Lai; further draft of Notice of Application for PPA;	1.20	1,002.00
09/19/25	JDF	Discussions and e-mails with Jordan Haywood et al. concerning BCA assessment date and revised calculations, further consider same;	1.40	1,071.00
09/19/25	ELW	Restrictive Covenant, call with Jim Fraser regarding Strata Plan;	0.30	247.50
09/19/25	SLS	Email from/to Peter Roberts regarding documents review from opposing counsel; save and email search criteria to Peter Roberts for review;	0.40	108.00
09/20/25	JKH	Review plaintiff's amended list of document and draft demand letter to plaintiff's counsel for additional document disclosure; email letter to Peter Roberts for review and comment;	2.80	1,190.00
09/21/25	JDF	Further consider recalculation of property price adjustment;	0.30	229.50
09/22/25	JXK	Revise Notice to Admit; confer with and email to Peter Roberts regarding same;	0.60	150.00

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Date	Timekeeper	Narrative	Hours	Amount
09/22/25	JDF	Emails and discussion with Peter, e-mails with D. Lai et al. concerning calculation of revised purchase price adjustment;	0.40	306.00
09/22/25	PJR	Review and revise letter to R. Mittal on further document demands; telephone call from R. Mittal on settlement; review Intracorp case law on application to dismiss Intracorp claim; review recently disclosed Intracorp documents; review and revise Notice of Application for PPA; revise Notice to Admit; draft J. King #1 Affidavit; email to D. Lai on PPA calculation;	2.50	2,087.50
09/22/25	JKH	Correspondence on file matters;	0.10	42.50
09/22/25	LAF	Review spreadsheet provided by BC Assessment and Schedule G, email to Lawson team regarding same;	2.50	1,537.50
09/23/25	JDF	E-mails with Lisa Frey et al. concerning revised calculation of purchase price adjustment, perform revised calculation as cross-check on same, e-mails and discussion with Peter et al concerning same;	1.00	765.00
09/23/25	JXK	Revise calculations for residential units only;	0.60	150.00
09/23/25	PJR	Review and consider additional PPA calculations; review excel spreadsheet; revise Notice of Application; emails with R. Mittal; review Amended Intracorp Notice of Civil Claim; reporting email to D. Lai and strata council; emails with R. Mittal; review B. Johnson #1 affidavit;	2.20	1,837.00
09/23/25	KS2	Research on interpretation of price adjustment clause and ejusdem generis principle; begin drafting memo;	6.50	3,347.50
09/23/25	ELW	Review and respond to emails, call with Peter Roberts, Lisa Frey and Jim Fraser;	0.40	330.00
09/23/25	LAF	Review and consider questions regarding excluded units; email to D. Lai re same;	0.60	369.00
09/24/25	JXK	Revise affidavit; confer with Peter Roberts; compile exhibits;	1.40	350.00
09/24/25	JKH	Email to K. Chan regarding hearing information; review email from Peter Roberts;	0.30	127.50

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Date	Timekeeper	Narrative	Hours	Amount
09/24/25	JDF	Further emails concerning calculation of purchase price adjustment, consider strategy on expert evidence;	0.40	306.00
09/24/25	PJR	Call with D. Lai on adjournment; reply email to B. Muk and others on adjournment and status; finalize J. King #1 affidavit; revise Notice of Application; emails with R. Mittal;	2.30	1,920.50
09/24/25	KS2	Further research on interpretation of price adjustment clause and ejusdem generis principle; continue drafting memo;	7.60	3,914.00
09/24/25	NMB	Email to lawyer and previous owner of TH 3368 confirming receipt of the same;	0.30	67.50
09/24/25	ELW	Review and respond to emails, call with Lisa Frey;	0.20	165.00
09/24/25	LAF	Review assessment reports to confirm non-residential units, email to D. Lai et al regarding same;	2.10	1,291.50
09/25/25	JXK	Revise and finalize affidavit and arrange to have same commissioned; prepare updated chart of assessed values for 2021; email to Peter Roberts regarding same;	2.00	500.00
09/25/25	JDF	E-mails with B. Hallsor, Peter Roberts et al. concerning revisions to 2001 BCA assessments and implications to percentage adjustment, consider same;	0.40	306.00
09/25/25	PJR	Review email and excel from B. Hallsor; continued drafting of Notice of Application; review research on contract interpretation;	1.80	1,503.00
09/25/25	NMB	Email to lawyer obtaining confirmation of release of delayed holdback possession; email to previous owner of Unit 302 confirming release of holdback; update main data spreadsheet; prepare and obtain lawyer signature on payout letter to owner regarding release of delayed possession holdback and related fee;	1.60	360.00
09/26/25	JXK	Prepare spreadsheet for 2023 assessed values; conference with Peter Roberts regarding same;	1.10	275.00
09/26/25	JKH	Review new assessment information from BC Assessor;	0.10	42.50

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Date	Timekeeper	Narrative	Hours	Amount
09/26/25	PJR	Emails from B. Hallsor on BC Assessment data; re-calculate PPA; instructions to Jas King;	0.30	250.50
09/26/25	JDF	Call and emails with B. Hallsor; emails and discussion with Peter Roberts; emails with D. Lai et al. concerning recalculated price adjustment;	0.60	459.00
09/26/25	NMB	Attend to payout of delayed deposit holdback and related fee; email to owners regarding of the same;	0.60	135.00
09/26/25	LAF	Review and sign deposit release letters;	0.20	123.00
09/29/25	NMB	Email to owner confirming payout date of deposit holdback;	0.40	90.00
09/30/25	JKH	Email to J. Chiang regarding status of court hearing;	0.10	42.50
Total			140.90	78,029.50

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ALEXA WILLS	AMW1	0.60	275.00	165.00
ED WILSON	ELW	1.10	825.00	907.50
JAS KING	JXK	12.10	250.00	3,025.00
JILLIAN SYCH	JMS	1.00	315.00	315.00
JIM FRASER	JDF	16.10	765.00	12,316.50
JORDAN HAYWARD	JKH	37.50	425.00	15,937.50
KATIE SYKES	KS2	14.10	515.00	7,261.50
LISA FREY	LAF	7.00	615.00	4,305.00
NIKKA BORJA	NMB	5.60	225.00	1,260.00
PETER ROBERTS	PJR	35.70	835.00	29,809.50
SHAUNA SIGURDSON	SLS	10.10	270.00	2,727.00
				$78,029.50

Taxable Other Charges

Photocopies	1,137.90
Colour Photocopies	150.00
QL System Searches	64.00
Library searches	32.00

Non-Taxable Disbursements

LTSA Services (E)	10.89

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Taxable Disbursements

Wix.Domain Name - RBC Visa/kyb	346.68
Molly Ring - View File - VLC-S-S-246230 None,CSO Invoice #: 1513	4.50
Molly Ring - CSO Invoice #: 1513919393 None	5.50
Molly Ring - CSO Invoice #: 1513919423 None	5.50
BC Online Service Charge	4.50
LTSA Service Charge	2.10
West Coast Title Searches	34.00

Total Fees		**$ 78,029.50**
Disbursements and Other Charges		**$ 1,797.57**
Total PST BC		**$ 5,462.06**
Total GST		**$ 3,990.81**
CURRENT INVOICE DUE:	**CAD**	**$ 89,279.94**

Outstanding Prior Balance

Invoice No.	1314167	12/16/24	$ 49,945.97
Invoice No.	1323473	02/18/25	$ 35,937.31
Invoice No.	1330179	03/17/25	$ 28,092.42
Invoice No.	1335323	04/28/25	$ 19,221.29
Invoice No.	1339235	05/19/25	$ 12,783.82
Invoice No.	1343984	06/20/25	$ 15,780.13
Invoice No.	1349298	07/18/25	$ 30,335.69
Invoice No.	1353553	08/18/25	$ 26,010.04
Invoice No.	1356203	09/25/25	$ 27,844.41

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 10/24/25
Invoice No. 1359230
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through September 30, 2025

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1359230

Total Professional Fees		78,029.50
Total Taxable Disbursements and Other Charges		1,786.68
Total Exempt Disbursements and Other Charges		10.89
Total BCPST		5,462.06
Total GST		3,990.81
Total Amount Due:	**CAD $**	**89,279.94**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
Royal Bank of Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 1038033
Bank ID: 003 **Transit:** 03215
Swift Code: ROYCCAT2

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:
Lawson Lundell LLP
Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

REMITTANCE

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 11/27/25
Invoice No. 1365107
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including October 31, 2025, as per attached detail.

Total Professional Fees		$	18,485.00
Total Taxable Disbursements and Other Charges		$	731.93
Total Exempt Disbursements and Other Charges		$	86.72
Total PST BC		$	1,293.95
Total GST		$	960.85
Current Invoice Due:	**CAD**	**$**	**21,558.45**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 11/27/25
Invoice No. 1365107
File No.: 037152.150991

ATTENTION: Derek Lai

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including October 31, 2025, as follows:

Date	Timekeeper	Narrative	Hours	Amount
10/01/25	NMB	Update main data spreadsheet; draft release of delayed possession holdback for TH3368 and 3374; email to lawyer providing of the same; email lawyer regarding Unit 905 holdback; telephone call with Unit 905 regarding of the same; attend to release of the delayed deposit holdback;	1.60	360.00
10/01/25	JXK	Revise affidavit, prepare summary of 2021 and 2023 assessments; conference with Peter Roberts regarding calculation of increased value; organize and assemble exhibits;	1.40	350.00
10/01/25	SCE	Review cheques and prepare letters for pickup;	0.20	25.00
10/01/25	JDF	Further emails with Peter Roberts concerning summary of Chuck's evidence, consider same;	0.40	306.00
10/01/25	PJR	Review and revise draft NOA on PPA; call with D. Lai and S. Davison; email to R. Mittal on PPA calculation; revise J. King #1;	1.80	1,503.00
10/01/25	LAF	Correspondence with owner and property manager regarding additional deposit releases;	0.30	184.50
10/02/25	NMB	Update main data spreadsheet;	0.60	135.00
10/02/25	JXK	Revise and finalize Notice to Admit and compile schedules; attend to the execution of affidavit of J. King; conference with Peter Roberts regarding same; prepare filesend link for notice to admit;	1.50	375.00
10/02/25	JDF	Further review and consider Peter Roberts's summary of opinion evidence in application, discussion with Peter Roberts concerning same;	0.40	306.00

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Date	Timekeeper	Narrative	Hours	Amount
10/02/25	PJR	Finalize J. King #1 affidavit; review and revise Notice to Admit; finalize Notice of Application for PPA; email to D. Lai on same;	0.80	668.00
10/03/25	TGK	Filing documents at court registry;	0.50	137.50
10/03/25	JKH	Review correspondence with opposing counsel regarding recalculation of purchase price adjustment value; review formal update to owners; review Notice of Application; review Notice to Admit; email litigation update to all former owners;	0.60	255.00
10/06/25	NMB	Email to lawyer confirmation of Unit owner; email to lawyer obtaining signature on payout letter to owner;	0.60	135.00
10/07/25	JKH	Email to Lisa Frey regarding list of former owners;	0.10	42.50
10/07/25	NMB	Attend to payout to Unit 905 release of holdback;	0.30	67.50
10/08/25	PJR	Letter from R. Mittal on hearing date; email to D. Lai on same;	0.20	167.00
10/08/25	JKH	Email correspondence with Lisa Frey regarding mailing list of former owners; email update to former owner; review letter from R. Mittal; draft revisions to update text of Joyce Place website and email draft to Peter Roberts for review and comment;	2.30	977.50
10/09/25	JKH	Email to Kevin Bahng regarding update to Joyce Place Website; review examination for discovery transcript and draft demand letter to opposing counsel for outstanding requests and information;	2.10	892.50
10/09/25	PJR	Email to R. Mittal with adjournment requisition;	0.10	83.50
10/09/25	PJR	Review and revise draft Joyce Place website update;	0.10	83.50
10/10/25	PJR	Review and revise letter on outstanding discovery requests; instructions to Jordan Hayward;	0.10	83.50
10/10/25	JKH	Send email update to former owners; finalize and send letter outlining outstanding requests following examinations to Peter Roberts for review and comment;	0.40	170.00
10/11/25	JKH	Review correspondence feedback from Peter Roberts and revise letter to opposing counsel; email to Peter Roberts confirming no further changes;	0.50	212.50
10/13/25	JDF	Further consider strategy on application;	0.30	229.50

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Date	Timekeeper	Narrative	Hours	Amount
10/14/25	JDF	Further consider strategy on application;	0.30	229.50
10/14/25	PJR	Email from R. Mittal on hearing dates;	0.10	83.50
10/14/25	JKH	Finalize and send letter to opposing counsel;	0.30	127.50
10/16/25	PJR	Review letter from R. Mittal on C. Brook opinion; review response to Notice to Admit; instructions to JKH on same; email to C. Brook; review and revise C. Brook affidavit;	0.40	334.00
10/16/25	AMW1	File affidavit at the Vancouver court registry;	0.40	110.00
10/16/25	JDF	Discussions and emails with Peter Roberts and Jordan Hayward, messages, discussion and meeting with C. Brook to prepare, revise and swear affidavit of expert evidence;	0.60	459.00
10/16/25	JKH	Review letter from R. Mittal regarding evidentiary issues; conference with Peter Roberts and Jim Fraser; draft affidavit #1 of C. Brook and corresponding exhibit package and send to Peter Roberts and Jim Fraser for review and comment; meet with C. Brook and commission affidavit; file sworn affidavit; begin reviewing reply to notice to admit;	5.00	2,125.00
10/16/25	NMB	Review and receive condition inspection report;	0.30	67.50
10/17/25	JKH	Draft disclosure letter to R. Mittal and send to Peter Roberts for review and comment; review letter from R. Mittal regarding outstanding requests from examination for discovery; email to Peter Roberts regarding property valuation findings in Reply to Notice to Admit; continue to review reply to Notice to Admit; draft Agreed Statement of Facts;	2.60	1,105.00
10/17/25	PJR	Review and revise letter to R. Mittal on C. Brook's opinion and B. Maurer evidence; instructions to Jordan Hayward;	0.20	167.00
10/18/25	JKH	Review Reply to Notice to Admit; verify authenticity of bylaw 12511 and 353; prepare all schedules of documents to be appended to Agred Statement of Facts; email to Peter Roberts disclosing findings;	0.70	297.50
10/20/25	PJR	Email with R. Mittal on without prejudice discussion;	0.10	83.50
10/21/25	JXK	Calculate prejudgment interest; email to Peter Roberts regarding same;	0.20	50.00

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Date	Timekeeper	Narrative	Hours	Amount
10/21/25	PJR	Call from R. Mittal on settlement prospects; reporting email to D. Lai on same;	0.40	334.00
10/21/25	JKH	Review previous correspondence and documents and continue to draft Agreed Statement of Facts; review email from Peter Roberts regarding settlement discussions; review documents and begin drafting response to outstanding request for documents from counsel for Intracorp	3.00	1,275.00
10/22/25	PJR	Email to D. Lai on assessment of settlement numbers and risk;	0.20	167.00
10/22/25	JKH	Finalize Agreed Statement of Facts and email to Peter Roberts on same; continue drafting response to outstanding document requests	0.70	297.50
10/23/25	JKH	Review email from client regarding meeting;	0.10	42.50
10/24/25	PJR	Draft email to Joyce Place council on settlement information;	0.20	167.00
10/24/25	JKH	Review correspondence regarding counsel meeting; review and consider instructions from Peter Roberts;	0.20	85.00
10/27/25	LAF	Email to purchaser counsel re owner holdback request (Unit 805);	0.80	492.00
10/28/25	NMB	Draft payout letter to Unit 805 and 1004 release of Delayed Possession Holdback; obtain lawyer signature of the same; update main data spreadsheet;	2.20	495.00
10/28/25	PJR	Without prejudice emails with R. Mittal; review letter form R. Mittal on document demands;	0.20	167.00
10/28/25	JKH	Review letter from opposing counsel regarding additional document demands;	0.10	42.50
10/28/25	LAF	Email to purchaser counsel; Email to property manager re status of remaining units;	0.30	184.50
10/29/25	NMB	Attend to payout to Unit 808 and 1004 release of delayed possession holdback;	0.50	112.50
10/30/25	PJR	Call with Joyce Place strata council on settlement draft formal offer and email to D. Lai;	1.00	835.00

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Date	Timekeeper	Narrative	Hours	Amount
10/30/25	JKH	Review correspondence and attend meeting with client and former counsel; review email from Peter Roberts regarding settlement;	0.80	340.00
10/31/25	PJR	Call from R. Mittal with final counter-offer;	0.10	83.50
10/31/25	PJR	Email from D. Lai on offer; email formal offer to R. Mittal; call with D. Lai on same; reporting email to D. Lai on council;	0.40	334.00
10/31/25	JKH	Review email from Peter Roberts;	0.10	42.50
Total			39.70	18,485.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ALEXA WILLS	AMW1	0.40	275.00	110.00
JAS KING	JXK	3.10	250.00	775.00
JIM FRASER	JDF	2.00	765.00	1,530.00
JORDAN HAYWARD	JKH	19.60	425.00	8,330.00
LISA FREY	LAF	1.40	615.00	861.00
NIKKA BORJA	NMB	6.10	225.00	1,372.50
PETER ROBERTS	PJR	6.40	835.00	5,344.00
SARA ENG	SCE	0.20	125.00	25.00
TRISTAN KIMBALL	TGK	0.50	275.00	137.50
				$18,485.00

Taxable Other Charges

Photocopies	333.90
Colour Photocopies	7.00

Non-Taxable Disbursements

MERCHANT: Court Services - Vancouver Supreme Court, Date: 10/3/2025, Filing Notice of Application (and Affidavits) with Court Registry	80.00
Library Services	6.72

Taxable Disbursements

Molly Ring - CSO Invoice #: 1513977358 None	5.50
Cash Disbursements - Wix.com - Domain Registration /kyb RBC visa	31.35
Cash Disbursements - Wix.com - Joyce Place Strata Annual Subscription - kyb RBC visa	346.68
Jordan Hayward - View File - VLC-S-S-133257 None,CSO Invoice #:	4.50
BC Online Service Charge	3.00

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Total Fees		**$ 18,485.00**
Disbursements and Other Charges		**$ 818.65**
Total PST BC		**$ 1,293.95**
Total GST		**$ 960.85**
CURRENT INVOICE DUE:	**CAD**	**$ 21,558.45**

Outstanding Prior Balance

Invoice No.	1314167	12/16/24	$	49,945.97
Invoice No.	1323473	02/18/25	$	35,937.31
Invoice No.	1330179	03/17/25	$	28,092.42
Invoice No.	1335323	04/28/25	$	19,221.29
Invoice No.	1339235	05/19/25	$	12,783.82
Invoice No.	1343984	06/20/25	$	15,780.13
Invoice No.	1349298	07/18/25	$	30,335.69
Invoice No.	1353553	08/18/25	$	26,010.04
Invoice No.	1356203	09/25/25	$	27,844.41
Invoice No.	1359230	10/24/25	$	89,279.94

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5

Invoice Date: 11/27/25
Invoice No. 1365107
File No.: 037152.150991

ATTENTION: Derek Lai

For Professional Services Rendered Through October 31, 2025

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1365107

Total Professional Fees	18,485.00
Total Taxable Disbursements and Other Charges	731.93
Total Exempt Disbursements and Other Charges	86.72
Total BCPST	1,293.95
Total GST	960.85
Total Amount Due: **CAD $**	**21,558.45**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
Royal Bank of Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 1038033
Bank ID: 003 **Transit:** 03215
Swift Code: ROYCCAT2

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:
Lawson Lundell LLP
Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

REMITTANCE

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5
Derek.Lai@crowemackay.ca; Tetsu.Takagaki@crowemackay.ca

Invoice Date: 12/19/25
Invoice No. 1373363
File No.: 037152.150991

ATTENTION: Derek Lai / Tetsu Takagaki

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including November 30, 2025, as per attached detail.

Total Professional Fees		$	4,025.50
Total Taxable Disbursements and Other Charges		$	1,469.95
Total PST BC		$	281.79
Total GST		$	274.77
Current Invoice Due:	**CAD**	**$**	**6,052.01**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5
Derek.Lai@crowemackay.ca; Tetsu.Takagaki@crowemackay.ca

Invoice Date: 12/19/25
Invoice No. 1373363
File No.: 037152.150991

ATTENTION: Derek Lai / Tetsu Takagaki

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including November 30, 2025, as follows:

Date	Timekeeper	Narrative	Hours	Amount
11/03/25	PJR	Call with former Joyce Place strata counsel on Intracorp counter-offer; email to R. Mittal;	0.50	417.50
11/03/25	JKH	Correspondence on file matters; attend meeting with former counsel and Peter Roberts regarding settlement offers; review settlement email from Peter Roberts;	0.60	255.00
11/04/25	PJR	Email from R. Mittal on counteroffer; reporting email to D. Lai on same;	0.10	83.50
11/04/25	JKH	Review settlement offer from opposing counsel	0.10	42.50
11/04/25	NMB	Email to property manager confirming receipt of condition inspection report for outstanding units;	0.50	112.50
11/04/25	LAF	Email to C. Lee re delayed possession matters;	0.30	184.50
11/05/25	PJR	Telephone call to and email to R. Mittal on Intracorp offer; call from R. Mittal;	0.20	167.00
11/05/25	JKH	Review email from Peter Roberts;	0.10	42.50
11/06/25	PJR	Emails with R. Mittal on Intracorp offer; emails with D. Lai on same; reporting email to Joyce Place council;	0.40	334.00
11/06/25	JKH	Review counteroffer from R. Mittal and correspondence with counsel members;	0.20	85.00
11/07/25	JKH	Schedule meeting with client and former council;	0.10	42.50
11/07/25	PJR	Call with D. Lai; email to R. Mittal on initial reactions to Intracorp offer;	0.10	83.50

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Date	Timekeeper	Narrative	Hours	Amount
11/10/25	PJR	Call with D. Lai, T. Takagaki and strata council to discuss Intracorp offer; emails with R.Mittal rejecting Intracorp offer; call with R. Mittal;	0.60	501.00
11/10/25	JKH	Prepare for and attend meeting with former strata council regarding most recent settlement offer;	0.60	255.00
11/10/25	NMB	Obtain copies of signed closing document and condition inspection report on Unit 805;	0.60	135.00
11/12/25	PJR	Email to E. Zhu on Community Fire settlement; telephone call from S. Hamilton on liquidator discharge and fees, C. Dennis notice to admit and community fire claim;	0.30	250.50
11/14/25	LAF	Email to property manager re remaining delayed possession holdbacks;	0.20	123.00
11/17/25	NMB	Draft payout letters to owners; attend to payout of the same;	1.60	360.00
11/18/25	NMB	Attend to organization of condition inspection reports for outstanding units with delayed possession holdback;	0.60	135.00
11/19/25	LAF	Email to owner re delayed possession correspondence;	0.20	123.00
11/20/25	JKH	Review email regarding possible application hearing dates;	0.10	42.50
11/21/25	LAF	Email to N. Par re delayed possession holdback;	0.20	123.00
11/24/25	JKH	Email to Ashley Cheng regarding application hearing dates;	0.10	42.50
11/25/25	JKH	Eemail to opposing counsel following up on outstanding requests following examination for discovery;	0.20	85.00
Total			8.50	4,025.50

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
JORDAN HAYWARD	JKH	2.10	425.00	892.50
LISA FREY	LAF	0.90	615.00	553.50
NIKKA BORJA	NMB	3.30	225.00	742.50
PETER ROBERTS	PJR	2.20	835.00	1,837.00
				$4,025.50

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Taxable Disbursements

Vendor: CHAREST LEGAL SOLUTIONS INC.; Invoice#: 152921; Date: 10/08/25 - Discovery of Evan Allegretto by P Roberts KC and Transcripts PJR/MCR	1,469.95

Total Fees		**$ 4,025.50**
Disbursements and Other Charges		**$ 1,469.95**
Total PST BC		**$ 281.79**
Total GST		**$ 274.77**
CURRENT INVOICE DUE:	**CAD**	**$ 6,052.01**

Outstanding Prior Balance

Invoice No.	1314167	12/16/24	$ 49,945.97
Invoice No.	1323473	02/18/25	$ 35,937.31
Invoice No.	1330179	03/17/25	$ 28,092.42
Invoice No.	1335323	04/28/25	$ 19,221.29
Invoice No.	1339235	05/19/25	$ 12,783.82
Invoice No.	1343984	06/20/25	$ 15,780.13
Invoice No.	1349298	07/18/25	$ 30,335.69
Invoice No.	1353553	08/18/25	$ 26,010.04
Invoice No.	1356203	09/25/25	$ 27,844.41
Invoice No.	1359230	10/24/25	$ 89,279.94
Invoice No.	1365107	11/27/25	$ 21,558.45

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925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5
Derek.Lai@crowemackay.ca; Tetsu.Takagaki@crowemackay.ca

Invoice Date: 12/19/25
Invoice No. 1373363
File No.: 037152.150991

ATTENTION: Derek Lai / Tetsu Takagaki

For Professional Services Rendered Through November 30, 2025

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1373363

Total Professional Fees		4,025.50
Total Taxable Disbursements and Other Charges		1,469.95
Total BCPST		281.79
Total GST		274.77
Total Amount Due:	**CAD $**	**6,052.01**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
Royal Bank of Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 1038033
Bank ID: 003 **Transit:** 03215
Swift Code: ROYCCAT2

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:
Lawson Lundell LLP
Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

THIS INVOICE IS PAYABLE UPON RECEIPT.

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REMITTANCE

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5
Derek.Lai@crowemackay.ca; Tetsu.Takagaki@crowemackay.ca

Invoice Date: 12/31/25
Invoice No. 1378406
File No.: 037152.150991

ATTENTION: Derek Lai / Tetsu Takagaki

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including December 31, 2025, as per attached detail.

Total Professional Fees		$	14,540.00
Total Taxable Disbursements and Other Charges		$	280.50
Total PST BC		$	1,017.81
Total GST		$	741.03
Current Invoice Due:	**CAD**	**$**	**16,579.34**

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Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5
Derek.Lai@crowemackay.ca; Tetsu.Takagaki@crowemackay.ca

Invoice Date: 12/31/25
Invoice No. 1378406
File No.: 037152.150991

ATTENTION: Derek Lai / Tetsu Takagaki

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including December 31, 2025, as follows:

Date	Timekeeper	Narrative	Hours	Amount
12/01/25	PJR	Emails with D. Lai on status, next steps and report to owners;	0.10	83.50
12/01/25	JKH	Review email from Peter Roberts regarding next steps in the underlying action; email to opposing counsel requesting answers to outstanding requests left at discovery; conduct document review; continue drafting responses to outstanding requests following examination of D. Lai;	1.50	637.50
12/02/25	JKH	Continue to review documents for inclusion in responses to the outstanding requests for documents and information for the examination for discovery of D. Lai; email draft responses to Peter Roberts for review and comments; arrange phone call with opposing counsel; draft email to client regarding outstanding requests for documents and information;	1.80	765.00
12/02/25	PJR	Email from and to B. Muck and counsel with update; emails with R. Mittal; review and revise D. Lai answers to discovery requests;	0.20	167.00
12/03/25	PJR	Email from and call to D. Lai; call with R. Mittal on Intracorp conditional acceptance of settlement; call to. Lai on same;	0.30	250.50
12/04/25	PJR	Emails with R. Mittal on Intracorp conditional acceptance of offer; reporting email to D. Lai on strata council;	0.20	167.00
12/15/25	PJR	Emails with R. Mittal on conditional settlement offer; email to D. Lai on same and SGM;	0.10	83.50
12/15/25	JKH	Review settlement offer from R. Mittal;	0.10	42.50

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Date	Timekeeper	Narrative	Hours	Amount
12/17/25	PJR	Discussion on SGM with Lisa Frey; reporting email on settlement to former Joyce Place council members;	0.20	167.00
12/17/25	JDF	Discussions and e-mails with Ed, Peter, Jordan and Chuck Brook concerning settlement	0.30	229.50
12/17/25	ELW	Review and respond to emails regarding SGM, Telephone call to Real Estate Broker;	0.60	495.00
12/17/25	LAF	Revise SGM notice re settlement; Discussion with Y. Aghazadeh re room booking;	2.10	1,291.50
12/18/25	JMS	Discussions regarding interest schedule or SGM Notice;	0.60	189.00
12/18/25	PJR	Attend meeting with Joyce Place council on Intracorp offer and calling SGM;	0.40	334.00
12/18/25	JKH	Arrange and attend meeting with former counsel regarding settlement offer;	0.60	255.00
12/18/25	ELW	Agm meeting with Strata Council, review SGM Notice, Review and respond to emails with Realtor;	0.70	577.50
12/18/25	LAF	Discussion with Jillian Sych re preparation of schedule; Coordinate booking of venue; Meeting with council re next steps;	1.40	861.00
12/19/25	PJR	Review and revise draft SGM notice; emails with Ed Wilson, Lisa Frey and D. Lai on same; review and revise FAQ from B. Muk;	0.40	334.00
12/19/25	JMS	Prepare data schedule for release of settlement funds; prepare interest schedule for SGM Notice;	1.30	409.50
12/19/25	NMB	Update owner email list;	0.50	112.50
12/19/25	ELW	Review and respond to emails;	0.50	412.50
12/19/25	ELW	Draft SGM Notice, Review and respond to emails;	1.20	990.00
12/21/25	PJR	Review and revise draft SGM notice; emails with Lisa Frey on same;	0.20	167.00
12/22/25	NMB	Update spreadsheet with new owner addresses;	0.60	135.00
12/22/25	LAF	Revisions to SGM notice; Circulate to liquidator re confirmation; Email to owners re address update;	1.10	676.50

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Date	Timekeeper	Narrative	Hours	Amount
12/23/25	NMB	Continuation of updating spreadsheet with new owner addresses;	0.60	135.00
12/23/25	ELW	Review SGM Notice, Review and respond to emails with Colliers, Review and respond to emails;	1.50	1,237.50
12/23/25	LAF	Coordinate address update; Set up proxy receipt email;	0.50	307.50
12/24/25	NMB	Continuation of update of spreadsheet with new owner addresses;	0.50	112.50
12/29/25	NMB	Continuation of update of owner new addresses;	0.50	112.50
12/29/25	JMS	Update interest schedule to SGM Notice;	0.50	157.50
12/29/25	LAF	Coordinate address updates; Communications with council re proxy representatives; Confirm liquidator fees;	1.40	861.00
12/30/25	JMS	Update spreadsheet with mailing address for past owners; discussion regarding SGM Notice mail out; preparing owner labels/envelopes for SGM Notice mail out;	1.90	598.50
12/30/25	LAF	Preparations for Information Meeting; Incorporate Zoom details into SGM notice; Coordinate final address updates; Preparations for mailout;	1.30	799.50
12/31/25	SCE	Prepare and send notice of special general meeting packages for multiple strata lots;	2.10	262.50
12/31/25	LAF	Draft email to owners enclose Special General Meeting notice re settlement proposal;	0.20	123.00
Total			28.00	14,540.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	4.50	825.00	3,712.50
JILLIAN SYCH	JMS	4.30	315.00	1,354.50
JIM FRASER	JDF	0.30	765.00	229.50
JORDAN HAYWARD	JKH	4.00	425.00	1,700.00
LISA FREY	LAF	8.00	615.00	4,920.00
NIKKA BORJA	NMB	2.70	225.00	607.50
PETER ROBERTS	PJR	2.10	835.00	1,753.50
SARA ENG	SCE	2.10	125.00	262.50
				$14,540.00

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Taxable Other Charges

Photocopies	280.50

Total Fees		**$ 14,540.00**
Disbursements and Other Charges		**$ 280.50**
Total PST BC		**$ 1,017.81**
Total GST		**$ 741.03**
CURRENT INVOICE DUE:	**CAD**	**$ 16,579.34**

Outstanding Prior Balance

Invoice No.	1314167	12/16/24	$	49,945.97
Invoice No.	1323473	02/18/25	$	35,937.31
Invoice No.	1330179	03/17/25	$	28,092.42
Invoice No.	1335323	04/28/25	$	19,221.29
Invoice No.	1339235	05/19/25	$	12,783.82
Invoice No.	1343984	06/20/25	$	15,780.13
Invoice No.	1349298	07/18/25	$	30,335.69
Invoice No.	1353553	08/18/25	$	26,010.04
Invoice No.	1356203	09/25/25	$	27,844.41
Invoice No.	1359230	10/24/25	$	89,279.94
Invoice No.	1365107	11/27/25	$	21,558.45
Invoice No.	1373363	12/19/25	$	6,052.01

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LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5
Derek.Lai@crowemackay.ca; Tetsu.Takagaki@crowemackay.ca

Invoice Date: 12/31/25
Invoice No. 1378406
File No.: 037152.150991

ATTENTION: Derek Lai / Tetsu Takagaki

For Professional Services Rendered Through December 31, 2025

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1378406

Total Professional Fees		14,540.00
Total Taxable Disbursements and Other Charges		280.50
Total BCPST		1,017.81
Total GST		741.03
Total Amount Due:	**CAD $**	**16,579.34**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
Royal Bank of Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 1038033
Bank ID: 003 **Transit:** 03215
Swift Code: ROYCCAT2

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:
Lawson Lundell LLP
Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

REMITTANCE

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

LAWSON LUNDELL LLP

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

CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5
Derek.Lai@crowemackay.ca; Tetsu.Takagaki@crowemackay.ca

Invoice Date: 02/13/26
Invoice No. 1382482
File No.: 037152.150991

ATTENTION: Derek Lai / Tetsu Takagaki

File Description: **JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE**

To professional services rendered up to and including February 13, 2026, as per attached detail.

Total Professional Fees		$	36,756.00
Total Taxable Disbursements and Other Charges		$	247.60
Total Exempt Disbursements and Other Charges		$	495.91
Total PST BC		$	2,572.92
Total GST		$	1,850.18
Current Invoice Due:	**CAD**	**$**	**41,922.61**

This is our account.

Lawson Lundell LLP

Per: _____
Peter J. Roberts, K.C.

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CROWE MACKAY & COMPANY LTD.
1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5
Derek.Lai@crowemackay.ca; Tetsu.Takagaki@crowemackay.ca

Invoice Date: 02/13/26
Invoice No. 1382482
File No.: 037152.150991

ATTENTION: Derek Lai / Tetsu Takagaki

File Description: JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE

To professional services rendered up to and including February 13, 2026, as follows:

Date	Timekeeper	Narrative	Hours	Amount
12/19/25	ELW	Review and respond to email regarding Demolition vs. Expropriation;	0.20	165.00
01/02/26	NMB	Review received proxy forms; update spreadsheet;	0.50	125.00
01/02/26	JMS	Receive and review proxy and confirm receipt; prepare schedule for status of proxies;	0.50	167.50
01/02/26	LAF	Coordinate receipt of proxies;	0.30	196.50
01/06/26	PJR	Discussion with Lisa Frey on FAQ and distribution issues; draft FAQ for owners; discussion with Derek Lai on same;	2.40	2,124.00
01/06/26	NMB	Email accounting to confirm deposit of cheque for Unit 605;	0.30	75.00
01/06/26	LAF	Discussion regarding interest upon destruction formula application; Email to purchaser's conveyancing lawyer regarding delayed possession agreement holdback matter; Draft proposed response to council;	1.10	720.50
01/06/26	ELW	Review and respond to emails with Lisa Frey;	0.50	437.50
01/07/26	JXK	Prepare prejudgment interest calculation; email to Peter Roberts;	0.20	53.00
01/07/26	NMB	Review and confirm receipt of proxy forms received;	0.50	125.00
01/07/26	PJR	Continue drafting and revise draft FAQ; email to and from D. Lai on same ; revise draft FAQ;	1.30	1,150.50

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Date	Timekeeper	Narrative	Hours	Amount
01/07/26	LAF	Respond to follow up questions regarding accounting questions; Consider proxy matters; Email to N. Borja re same; Email to purchaser conveyancing counsel regarding former owner dispute related to delayed possession agreement;	1.30	851.50
01/08/26	JMS	Prepare trust reconciliation statements with amounts received and paid out at closing and amounts received and Paid out for Special Levy, CRF and OP Fund;	1.90	636.50
01/08/26	PJR	Review revised FAQ and trust reconciliation; meeting with Jillian Sych and Lisa Frey to finalize FAQ, trust reconciliation and owner spreadsheet;	0.50	442.50
01/08/26	LAF	Meeting with Jillian Sych and Peter Roberts re accounting matters; Finalize draft FAQ document; Email to brokers re density bonus;	1.20	786.00
01/08/26	ELW	Call with Lisa Frey regarding Infrastructure Meeting, Density Bonus;	0.40	350.00
01/09/26	NMB	Review received proxy forms;	0.50	125.00
01/09/26	JMS	Prepare schedules for Allocation of balance of Special Levy; allocation of balance of CRF/Op Fund and reallocation of invoices; prepare schedule showing estimate net settlement funds together with balance of special levy allocation; update trust reconciliation regarding special levy and CRF/Op Fund;	1.20	402.00
01/09/26	PJR	Review and comment on trust reconciliation, cost allocation and distribution spreadsheet;	0.10	88.50
01/09/26	LAF	Follow up correspondence with brokers regarding density bonus in connection with currently approved rezoning application and amendment;	0.30	196.50
01/09/26	ELW	Review Density Issue and relocation calculations, Review and respond to emails with Realtor;	0.30	262.50
01/12/26	PJR	Review email and FAQ revisions from B. Muk;	0.10	88.50
01/12/26	NMB	Review received proxy forms; update spreadsheet;	0.70	175.00
01/12/26	JKH	Attending meeting with former counsel	0.90	427.50
01/12/26	LAF	Videoconference with liquidator and council re density bonus and return of special levy;	1.30	851.50

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Date	Timekeeper	Narrative	Hours	Amount
01/13/26	PJR	Review and revise payout table; discussion and emails with Lisa Frey on same;	0.10	88.50
01/13/26	JMS	Update schedule and trust reconciliation to reflect updated amount to be released from balance of special levy and requested holdback amount re Denisty bonus;	0.70	234.50
01/13/26	LAF	Updates to distribution schedule; Email to client re special levy accounting;	0.90	589.50
01/14/26	SCE	Prepare and send out SGM letter to updated address;	0.10	13.50
01/14/26	PJR	Final review and comment on FAQ; discussion with Lisa Frey on same;	0.20	177.00
01/14/26	NMB	Update owner address; attend to mail out copy of SGM; receive received SGM package;	0.60	150.00
01/14/26	LAF	Revisions to FAQ document; Confirm with client and counsel; Distribute to owners;	1.30	851.50
01/14/26	ELW	Call with Lisa Frey regarding infrastructure meeting; Review FAQ material;	0.50	437.50
01/15/26	PJR	Prepare for and attend Joyce Place owner information meeting;	1.00	885.00
01/15/26	JKH	Attend information meeting with owners;	1.00	475.00
01/15/26	NMB	Review received signed proxies; update owner address;	0.60	150.00
01/15/26	LAF	Prepare for and attend information session;	1.30	851.50
01/15/26	ELW	Prepare and host infrastructure meeting;	1.40	1,225.00
01/16/26	NMB	Review received completed proxy form; update spreadsheet;	0.60	150.00
01/16/26	PJR	Consider owner photos of "Intracorp "excavation" at Joyce Place; email from B. Muk; email to D. Lai on same;	0.10	88.50
01/16/26	JKH	Email to Lisa Frey;	0.10	47.50

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Date	Timekeeper	Narrative	Hours	Amount
01/16/26	LAF	Consider matters related to City permits, construction mortgage, etc.; Email to owners attaching recording for info session; Coordinate SGM meeting preparation;	1.10	720.50
01/16/26	ELW	Review issue regarding Density Bonus Trigger, Review and respond to emails;	0.30	262.50
01/17/26	PJR	Email to B. Muk on Denisty Bonus trigger;	0.10	88.50
01/19/26	JMS	Prepare sign-in sheet and ballots for SGM;	1.00	335.00
01/19/26	NMB	Review received complete proxy forms; update spreadsheet of the same;	0.80	200.00
01/20/26	SCE	Prepare proxy form documents for review;	0.80	108.00
01/20/26	JMS	Update data spreadsheet and trust reconciliation statement to include payment of venue for SGM; receiving SGM Notices;	0.60	201.00
01/20/26	NMB	Review received proxy forms; update spreadsheet; email to lawyer providing of the same;	0.50	125.00
01/20/26	LAF	Review draft response to owner; Coordinate venue rental; Responses to owners; Cross-reference proxies;	1.60	1,048.00
01/20/26	ELW	Prepare for SGM;	0.40	350.00
01/21/26	SCE	Review incoming proxy forms;	0.70	94.50
01/21/26	NMB	Review received proxy forms; update spreadsheet; file received proxy forms from B. Muk;	0.60	150.00
01/21/26	JKH	Attend special general meeting;	1.00	475.00
01/21/26	ELW	Attend SGM, prepare for same;	2.50	2,187.50
01/21/26	LAF	Conference with N. Borja re meeting matters and confirm proxy count; Prepare for and attend SGM;	3.10	2,030.50
01/22/26	PJR	Telephone call to and emails with R. Mittal on s.282 Resolution and settlement; call with D. Lai;	0.30	265.50
01/22/26	ELW	Review and respond to emails regarding settlement issues, post meeting issues, email to realtors regarding issues;	0.50	437.50

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Date	Timekeeper	Narrative	Hours	Amount
01/23/26	PJR	Emails with R. Mittal on trust transfer and draft set aside order for Order of Justice Kent; draft same;	0.30	265.50
01/23/26	ELW	Review and respond to emails with Realtors, Call with Lisa Frey regarding minutes and updates;	1.00	875.00
01/26/26	PJR	Emails with R. Mittal on CDO and draft mutual release; review and revise mutual release;	0.50	442.50
01/26/26	LAF	Finalize draft SGM minutes;	0.30	196.50
01/26/26	ELW	Review Minutes;	0.30	262.50
01/27/26	PJR	Email from R. Mittal on release; revise form of mutual release; emails with D. Lai and B. Muk on same;	0.40	354.00
01/27/26	NMB	Update owner email address;	0.30	75.00
01/27/26	ELW	Review and respond to email regarding next stage with D.B.;	0.20	175.00
01/28/26	PJR	Emails with R. Mittal to finalize mutual release; email to D. Lai on same;	0.30	265.50
01/28/26	NMB	Update owner mailing address;	0.30	75.00
01/28/26	LAF	Emails to various owners re address update, answer queries;	0.60	393.00
01/29/26	PJR	Emails with R. Mittal on payment of settlement funds; reporting email to D. Lai and B. Muk; entry of consent orders;	0.40	354.00
01/29/26	LAF	Email to D. Lai et al re finalize minutes;	0.20	131.00
01/29/26	ELW	Call with Lisa Frey, Review and respond to emails;	0.30	262.50
01/30/26	NMB	Update owner mailing address;	0.60	150.00
01/30/26	LAF	Coordinate address update with remaining owners; Email to owners re update enclose SGM minutes;	0.80	524.00
01/30/26	ELW	Call with Lisa Frey; review and respond to emails;	0.30	262.50
02/02/26	NMB	Update owner mailing addresses; telephone call with Unit 404 to confirm updated mailing address;	0.60	150.00

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Date	Timekeeper	Narrative	Hours	Amount
02/02/26	JMS	Draft letter to realtor enclosing payment of commission; draft form of letter to owners enclosing balance of settlement funds; update data spreadsheet;	0.90	301.50
02/02/26	LAF	Correspondence with various owners re update addresses;	0.20	131.00
02/03/26	JMS	Prepare form of payout letter to owner enclosing release of settlement funds and related trust reconciliation statement; update data spreadsheet;	1.10	368.50
02/03/26	LAF	Conference re next steps; Review payout materials;	0.50	327.50
02/04/26	NMB	Update owner mailing address;	0.30	75.00
02/04/26	LAF	Review planning report; Consider density bonus calculations in light of additional application regarding daycare facility; Email to team re same;	1.60	1,048.00
02/05/26	JMS	Finalize letter to realtor for payment of commission; update trust balance spreadsheet;	0.40	134.00
02/05/26	PJR	Review J. Darling FSR calculations; email to D. Lai on discharge and holdback issues; draft email to B. Muk and D. Lai on Density Bonus interpretation and probability of payment;	0.40	354.00
02/05/26	LAF	Consider matters relating to density bonus assessment; Email to J. Darling and H. Buck re same;	0.70	458.50
02/06/26	JMS	Update trust balance spreadsheet; arrange for transfer of trust funds from Bank of Nova Scotia to Bank of Montreal;	0.80	268.00
02/06/26	PJR	Email from D. Lai on Density Bonus; email to B. Muk on same;	0.10	88.50
02/06/26	NMB	Update main data spreadsheet; attend to payout to Colliers and trust transfer form;	0.50	125.00
02/10/26	JMS	Review data spreadsheet; update trust balances to reflect recent payouts;	0.30	100.50
02/10/26	LAF	Email to J. Sych re transfer of trust funds;	0.10	65.50
02/11/26	LAF	Email to liquidator re invoices, final reconciliation;	0.20	131.00

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Date	Timekeeper	Narrative	Hours	Amount
02/11/26	PJR	Email from B. Muk on Denisty Bonus issue; email to group on next steps; draft Liquidator discharge application;	0.70	619.50
02/11/26	JKH	Review Notice of Application; conference with Peter Roberts regarding discharge affidavit	0.20	95.00
02/12/26	JMS	Review liquidator invoices; update data spreadsheet; prepare letter to liquidator enclosing payment of outstanding invoices;	1.00	335.00
Total			62.60	36,756.00

Fee Summary

Timekeeper	Initials	Hours	Rate	Total
ED WILSON	ELW	0.20	825.00	165.00
ED WILSON	ELW	8.90	875.00	7,787.50
JAS KING	JXK	0.20	265.00	53.00
JILLIAN SYCH	JMS	10.40	335.00	3,484.00
JORDAN HAYWARD	JKH	3.20	475.00	1,520.00
LISA FREY	LAF	20.00	655.00	13,100.00
NIKKA BORJA	NMB	8.80	250.00	2,200.00
PETER ROBERTS	PJR	9.30	885.00	8,230.50
SARA ENG	SCE	1.60	135.00	216.00
				$36,756.00

Taxable Other Charges

Photocopies	228.30

Non-Taxable Disbursements

Vendor: COLLINGWOOD NEIGHBOURHOOD HOUSE; Invoice#: FR-11670; Date: 1/21/2026 - Meeting room rental / LAF	450.00
LTSA Services (E)	45.91

Taxable Disbursements

BC Online	10.00
BC Online Service Charge	3.00
LTSA Service Charge	6.30

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Total Fees		**$**	**36,756.00**
Disbursements and Other Charges		**$**	**743.51**
Total PST BC		**$**	**2,572.92**
Total GST		**$**	**1,850.18**
CURRENT INVOICE DUE:	**CAD**	**$**	**41,922.61**

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Canada V6C 3L2

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1100 - 1177 WEST HASTINGS STREET
VANCOUVER, BC
V6E 4T5
Derek.Lai@crowemackay.ca; Tetsu.Takagaki@crowemackay.ca

Invoice Date: 02/13/26
Invoice No. 1382482
File No.: 037152.150991

ATTENTION: Derek Lai / Tetsu Takagaki

For Professional Services Rendered Through February 13, 2026

File No.:	037152.150991
Matter Reference:	JOYCE PLACE (LMS992 - 3380 VANNESS) WIND-UP AND SALE
Contact:	ROBERTS, PETER
Invoice	1382482

Total Professional Fees		36,756.00
Total Taxable Disbursements and Other Charges		247.60
Total Exempt Disbursements and Other Charges		495.91
Total BCPST		2,572.92
Total GST		1,850.18
Total Amount Due:	**CAD $**	**41,922.61**

This remittance advice should be returned to ensure proper credit to your account. Thank you.

Payment Options:

EFT/Wire Transfer:
Royal Bank of Canada
885 West Georgia Street, Vancouver, B.C., V6C 3G1
Account Name: Lawson Lundell LLP
Account No.: 1038033
Bank ID: 003 **Transit:** 03215
Swift Code: ROYCCAT2

Cheque:
Cheques payable to Lawson Lundell LLP and mailed to the following address:
Lawson Lundell LLP
Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2

Interac e-Transfer:
e-Transfer funds to eftpmt@lawsonlundell.com referencing invoice number in message.

Please email us at eftpmt@lawsonlundell.com referencing invoice number and payment amount.

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

REMITTANCE