

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.

GROUND OF PRIVILEGE

Solicitor/Client Privilege

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

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.

Schedule "A"

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	

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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	

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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	

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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@dwelldproperty.ca>;sean dimitrie <seandimitrie@gmail.com>;simon davison <simondavison@gmail.com>;<pearlkaoche ung@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 <jlepp@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@dwelldproperty.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@dwelldproperty.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	

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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@intracorhomes.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	

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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@intracorhomes.com>;leo chan <leo.chan@dwelldproperty.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' <cleee@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@dwelldproperty.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	

Schedule "A"

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	

Schedule "A"

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	

Schedule "A"

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		

Schedule "B"

BEGBATES	DATE	TYPE	GROUND 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

Schedule "B"

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