



This is the 1st Affidavit of Rene Saucier
in this case and was made on February 19, 2025

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

AND:

INTRACORP VANNESS LIMITED PARTNERSHIP

DEFENDANT BY WAY OF COUNTERCLAIM

AFFIDAVIT

I, Rene Saucier, Security Technician, care of 1600 – 925 West Georgia Street, in the City of Vancouver, in the Province of British Columbia, SWEAR THAT:

1. I am a certified low voltage security technician and the president of Safeco Systems Ltd. (“Safeco”), 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. In 2018, Safeco was engaged by The Owners, Strata Plan LMS992, also known as Joyce Place (“Joyce Place”), to provide fire monitoring services for Joyce Place. At this time,

there was an existing fire alarm monitoring panel installed at Joyce Place which Safeco used to monitor the Joyce Place buildings for fire safety since 2018.

3. In or about June 2024, I determined that the existing fire alarm monitoring panel and wiring system at Joyce Place needed to be upgraded to meet current Underwriter Laboratories of Canada (“**ULC**”) alarm monitoring requirements.

4. I caused Safeco to advise Joyce Place’s property manager of the required fire monitoring system upgrade on or about August 2, 2024, and instructed the property manager to arrange for the upgrade of the wired internet connection for the Joyce Place building to enable the installation of the new fire monitoring system. Telus Communications Inc. (“**Telus**”) completed the internet system upgrade of Joyce Place on or about September 5, 2024.

5. On September 7, 2024, I attended at Joyce Place and saw the Telus wired internet connection upgrade had been installed. As a result, I completed the fire monitoring system upgrade for the Joyce Place buildings that day to meet the ULC requirements.

6. To effect the upgrade, I removed the existing fire communication panel and keypad located in the electrical room of Joyce Place, and installed a new control panel, Global System for Mobile/Internet communication panel, and keypad (the “**New Panel**”). I rewired the New Panel to the internet router installed by Telus and to a power source.

7. Once the New Panel was connected to power and the internet, I located Joyce Place’s existing fire conductors, and redirected them to connect the fire alarm, fire trouble and fire supervisory signals to the New Panel pursuant to ULC standards. At this time, the upgrade of Joyce Place’s fire monitoring system was complete (the “**Upgraded System**”).

8. I tested the Upgraded System which I found to be fully operational and actively communicating with the fire dispatch operator as of September 7, 2024.

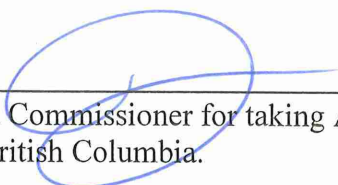
9. Once the Upgraded System was fully installed and operational, I began final ULC certification testing. However, I could not complete these final tests, as another company was performing a different fire safety inspection throughout Joyce Place at that time which engaged the Upgraded System such that I could not test it at the same time.

10. Despite not being able to complete ULC certification testing, the Upgraded System was fully operational and actively monitoring Joyce Place as of September 7, 2024.

11. On September 9, 2024, I emailed the property manager of Joyce Place advising him that installation of the Upgraded System was complete, and that Joyce Place was being actively monitored for fire safety in accordance with ULC alarm monitoring codes.

12. Attached hereto and marked as **Exhibit "A"** to this affidavit is a true copy of the email I sent to the property manager of Joyce Place on September 9, 2024.

SWORN BEFORE ME at Vancouver, British Columbia on February 19, 2025.)
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A Commissioner for taking Affidavits for
British Columbia.



RENE SAUCIER

JORDAN HAYWARD
Barrister & Solicitor
1600 - 925 WEST GEORGIA ST.
VANCOUVER, B.C. V6C 3L2
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Jordan Hayward (3179) - 14Flr

From: Leo Chan <leo.chan@dwelproperty.ca>
Sent: Monday, September 9, 2024 11:29 AM
To: Derek Lai; Tetsu Takagaki
Subject: FW: Joyce Place in Vancouver
Attachments: Safeco_Systems_Ltd._Invoice_Credit_9-9-2024_14548.pdf; Safeco_Systems_Ltd._Invoice_Credit_9-9-2024_14527.pdf

Importance: High

CAUTION: External Email.

Fire monitoring fully operational.

Best Regards,

Leo Chan BSc. | Property Manager



This is Exhibit "A" referred to in the affidavit of Rene Saucier sworn before me at Vancouver, British Columbia, this 19 day of February, 2025.

[Signature]

A Commissioner for taking Affidavits within British Columbia.

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From: rsaucier@safecosystems.com <rsaucier@safecosystems.com>
Sent: Monday, September 9, 2024 11:08 AM
To: Leo Chan <leo.chan@dwelproperty.ca>
Subject: RE: Joyce Place in Vancouver
Importance: High

Leo,

We have found that extra pair that was buried in the wall. And now the fire panel is now monitored properly for Fire, Trouble and Supervisory as per code

I need a few more days of regular test reporting them I can schedule a ULC test to get ULC certification .. I can schedule that for Thursday morning

Attached are the invoices for the monitoring and recent work.. please ensure this is promptly done..

As well, we will need new contact and billing info going forward...

Right now, the 24H emergency line for the fire panel is set to Dell, let me know who it should be going forward ??



Official Website is: www.safecosystems.com

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