



This is the 1st affidavit
of Brenden Lie in this case and
was made on the 22nd day of May 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

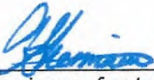
AFFIDAVIT

I, Brenden Lie, Field Engineer, of 1661 West 5th Avenue, Vancouver, British Columbia,
V6J 1N5, SWEAR THAT:

1. I am a Field Engineer employed by Glotman Simpson Consulting Engineers ("GS") and as such, I have personal knowledge of the facts and matters deposed to in this affidavit, except where they are stated to be based on information and belief, and those matters I believe to be true.
2. GS is one of the leading North America's leading structural engineering firms. GS has been in business for over sixty years, and has offices in Vancouver, Calgary, and Los Angeles.
3. Notable British Columbia GS projects include: Parq Vancouver Casino; the Vancouver Convention Centre Expansion; the RCMP E Division Headquarters in Surrey; TELUS Garden; and Vancouver Olympic Village.
4. I hold a Bachelor of Engineering from McMaster University and an Engineer-in-Training ("EIT") designation under Engineers and Geoscientists BC. The EIT designation is part of the process to receive a Professional Engineer ("P. Eng") designation, which requires 4 years of work experience under the EIT designation, in addition to legal, ethical, and general competency requirements.

5. I have 3.5 years of work experience at GS as a Field Engineer under the EIT designation and under the direct supervision of a licensed P. Eng, during which I have worked as a field reviewer of new construction and existing buildings throughout the Lower Mainland.
6. In about September of 2024, GS was engaged by Intracorp to inspect 3362, 3364, 3366, 3368, 3370, 3372, 3374, 3376, 3378, 3380, 3382 and 3384 Vanness Avenue, Vancouver, British Columbia (the "**Property**"), and provide a structural site report with recommendations for the Property.
7. On September 18, 2024, I visited and inspected the Property. The intent of the visit was to provide an engineering review of eight town house units and provide comments on whether the current state of the building poses a safety concern.
8. Attached as **Exhibit "A"** to this my affidavit is a true copy of a Structural Site Report dated October 1, 2024, which I prepared after my site visit.

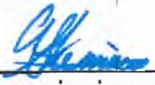
SWORN BEFORE ME at City of Vancouver,)
Province of British Columbia, on the 22nd day)
of May, 2025)


A Commissioner for taking affidavits for British
Columbia


BRENDEN LIE

SHERMAINE CHUA
Barrister & Solicitor
Cassels Brock and Blackwell LLP
#2200 - 885 West Georgia Street
Vancouver, B.C. V6C 3E8
Phone: (778) 309-7971

This is Exhibit " A " referred to in the
affidavit of Brenden Lie
sworn before me at Vancouver ,
this 22nd day of May , 20 25



A Commissioner for taking Affidavits
in British Columbia

STRUCTURAL SITE REPORT

Project Name: 3362-3384 Vanness Avenue

Contractor: Intracorp Homes

Contractor's Representative: Ben Lin

GS Representative: Brenden Lie, EIT

Project Number: 221469

Date: October 1, 2024

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Weather: Sun



☐ Work incomplete, re-review required.
Additional field review costs may be incurred.

☒ Critical elements reviewed and conveyed to
Contractor's Representative.

Findings/Work Reviewed:

Glotman-Simpson was retained by Intracorp Homes and attended a site review at 3362-3384 Vanness Avenue, Vancouver, BC, on September 18. The intent of the visit was to provide engineering review of eight town house units with a compromised building envelope. Water has penetrated within the interior of the building system, raising concerns over the state of the structural system. Intracorp Homes have requested Glotman-Simpson provide comments on whether the current state of the building poses a safety concern.

During the site review, Glotman-Simpson did not perform an exhausting review of the entire structure, rather, a visual review was conducted at the front, street-facing rooms of the building around the front windows. Several units were still occupied and access was limited. In other units, localized abatement of finishes was prepared to observe the condition of interior building framing and structural conditions.

A previous building envelope review had noted multiple units to be under high-risk. Unit 3376 had previously been boarded up prior to the GS review. All units were provided with temporary shoring systems on both the main and upper level, reflecting deteriorated base building framing capacity. Particularly, shoring was located inside the front window(s) where the water damage and decay was previously observed (Figure 15). Some observations of note:

- Unit 3376 displayed multiple areas with mold growing through the carpet and drywall (Figures 1-3, Figure 12).
- The front room on both levels of the stacked townhouse structure(s) displayed signs of significant organic growth and decay on multiple structural members and plywood sheathing (Figures 4-11).
- Multiple posts were observed with over 50% of the section missing through decay (Figure 6, Figure 9).
- The remaining occupied seven units had small sections of drywall previously cut during the building envelope investigation. This allowed limited review of the structural framing system as plastic sheeting and insulation remained in multiple locations (Figures 20-23).
- Several locations did indicate signs of decay and organic growth on wooden framing members within the wall (Figures 19, 24, 35).
- Window sills displayed signs of decay with cracked wooden framing and organic growth. A few locations appear to have mold growing/moisture within the insulation (Figures 26-28, 36), with another location appearing to have mold growing through the drywall (Figure 22).

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Per

Brenden Lie

Emailed - Reviewed with Contractor

- ☒ Glotman-Simpson Consulting Engineers
- ☐ GS - Sayers Engineering Ltd.
- ☐ Glotman-Simpson US Inc.

Accepted for Contractor

Any corrective work noted above requires the immediate attention of the Contractor and constitutes written instructions to bring the work into conformity with the plans and specifications at no extra cost to the owner. This shall not be construed as a complete list nor shall it relieve the Contractor from the responsibility for the proper performance of his work in accordance with the drawings and specifications. Errors and omissions expected.

STRUCTURAL SITE REPORT

Project Name: 3362-3384 Vanness Avenue

Contractor: Intracorp Homes

Contractor's Representative: Ben Lin

GS Representative: Brenden Lie, EIT

Project Number: 221469

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Page 2 of 2

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Findings/Work Reviewed:

Glotman Simpson Comments and Recommendations:

Given that exposed framing in Unit 3376 displayed significant signs of structural deterioration and the remaining units showed similar signs of moisture, organic growth, and decay within the wall framing systems, Glotman-Simpson recommends vacating the premises. Notwithstanding there is shoring framing in these units that forestalls failure of the observed framing, it is not clear that this shoring is adequate, nor provided in all in areas with visible mold and deterioration. Areas of visible mold and water ingress are extensive. Remediation, if possible, would need to be undertaken in hazardous working conditions and would require the removal of finishes along the building fronts, as well as at a depth of several feet from the front facade. Shoring walls would need to relieve all load from this portion of the building frontage prior to work progressing. Facilitating this work in an occupied building, with hazardous materials is not possible with occupants living in the units.

We caution that whereas we note minimum actions to repair and reinstate a functional building, repair may not be practical. The ingress of mold and deterioration of framing looks to persist well within the building footprint. It is not clear where this damage stops, and repairs will be extensive, if possible.

Limit of Liability:

It should be noted that this structural site report is based on a visual inspection of the existing structure and no testing or dismantling was performed, other than what was exposed to view. Inspections were made on a random basis with no attempt to review or inspect every element or portion of the building. The intent of the review was to determine areas of visually obvious deterioration and to generally determine the overall quality and sufficiency of the work, but not to ascertain the quality or sufficiency of any specific aspect of the development. Our comments are not a guarantee or warranty of any aspect of the condition of the development whatsoever.

This report was prepared by Glotman-Simpson Consulting Engineers for the account of Intracorp Homes. The material in it reflects the existing structural condition of the existing building to our best judgment in light of the information available to us at the time of preparation.

Any use which a third party makes of this report, or any reliance on or decisions to be made based on it, are the responsibility of such third parties. Glotman-Simpson Consulting Engineers accepts no responsibility for damages, if any, suffered by any third party as a result of decisions made or actions based on this report.

We trust the above is satisfactory for your needs at this time. Please feel free to contact us if we can provide any further information or clarification on this matter.

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Appendix A

Site Photos from 09/18/2024

Figure 1

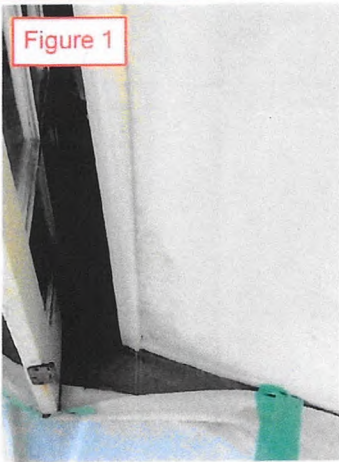


Figure 2



Figure 3

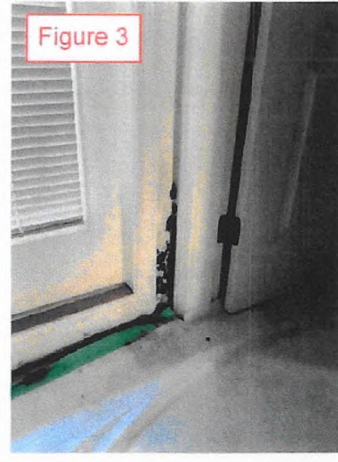


Figure 4

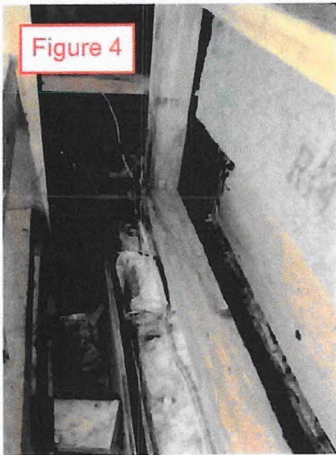


Figure 5

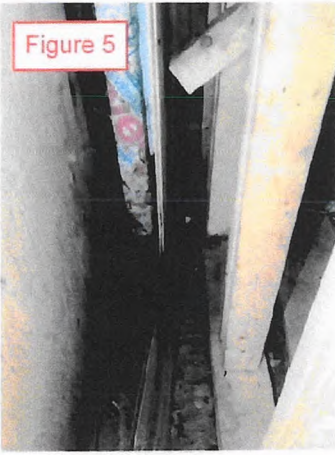


Figure 6

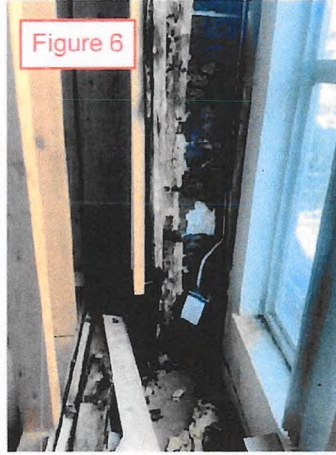


Figure 7



Figure 8



Figure 9

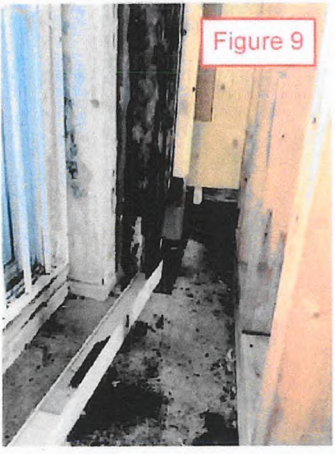


Figure 10

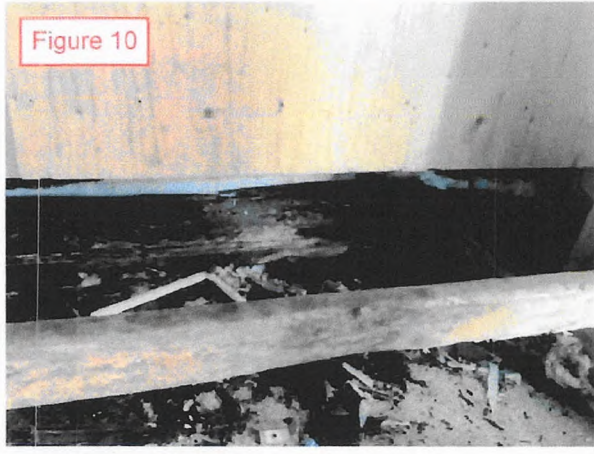


Figure 11

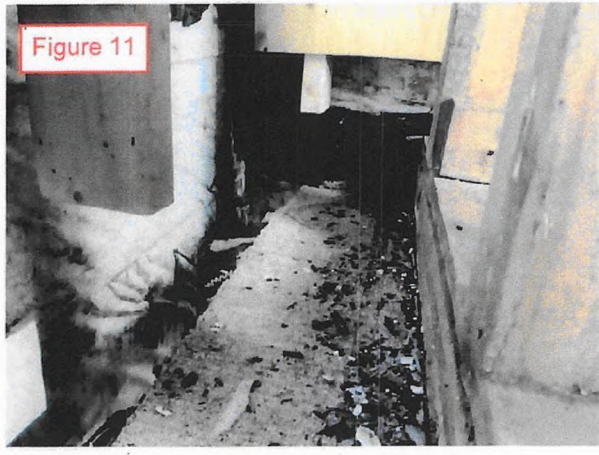


Figure 12



Other Units

6

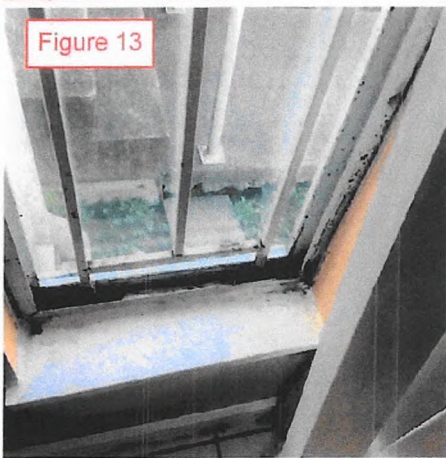


Figure 13

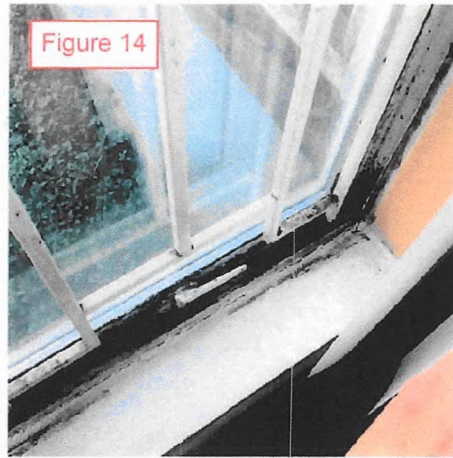


Figure 14



Figure 15



Figure 16



Figure 17



Figure 18

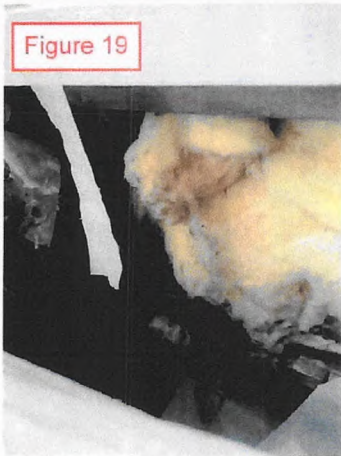


Figure 19

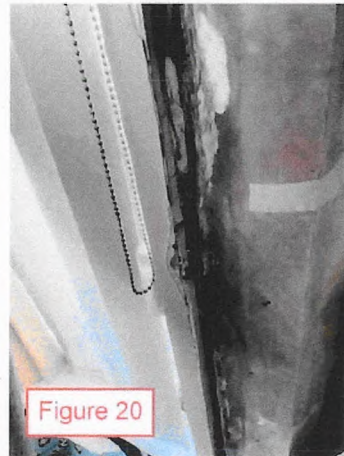


Figure 20



Figure 21



Figure 22



Figure 23

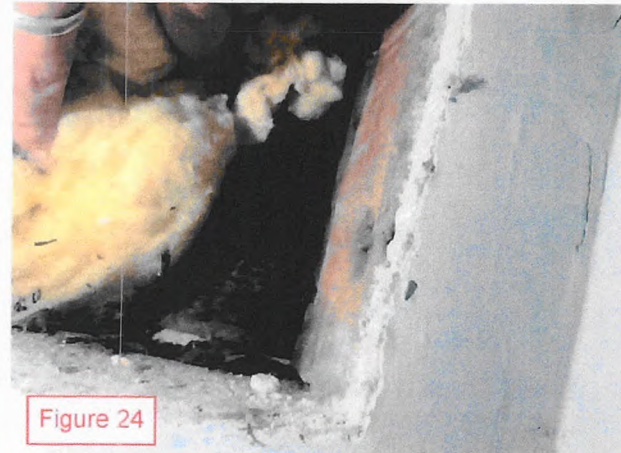


Figure 24



Figure 25

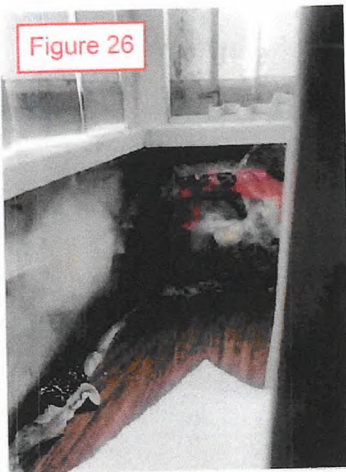


Figure 26

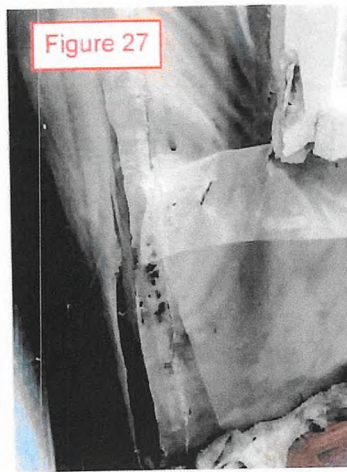


Figure 27



Figure 28



Figure 29



Figure 30

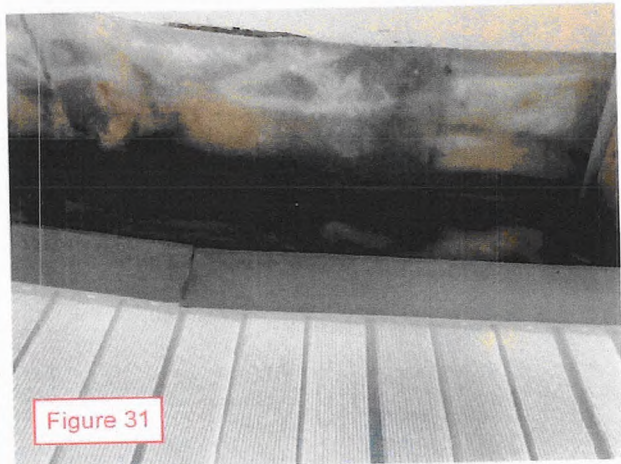


Figure 31



Figure 32



Figure 33

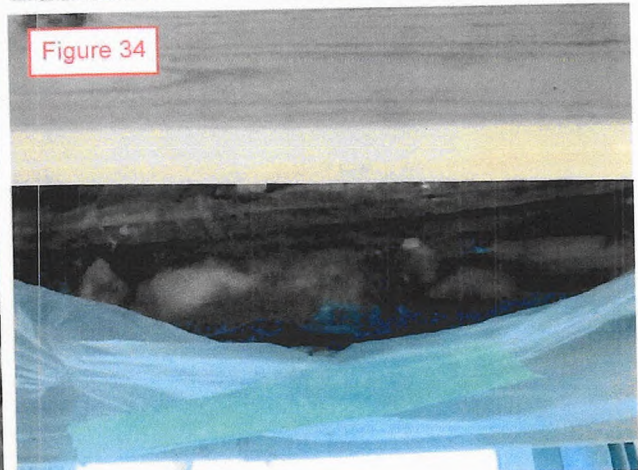


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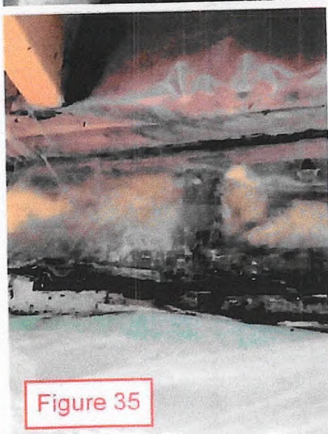


Figure 35

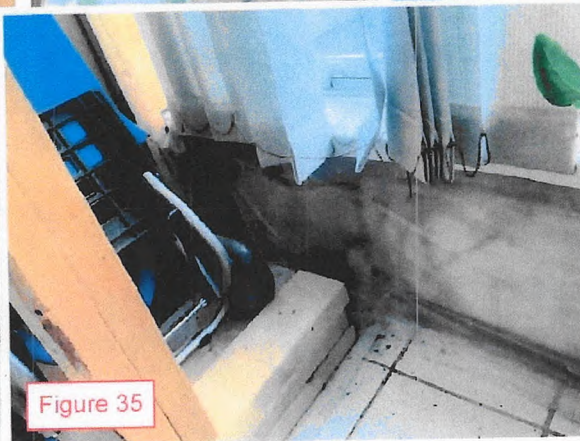


Figure 35



Figure 36

