



FORM 109 (RULE 22-2 (2) AND (7))

This is the 3rd affidavit of Alex En Hwa Ng in this case and was made on June 19, 2020

No. H 200039
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

PEOPLES TRUST COMPANY

Petitioner

AND:

CENSORIO GROUP (HASTINGS & CARLETON)
HOLDINGS LTD.
PETER CENSORIO also known as PETER ANTHONY CENSORIO
and PETER ANTHONY CENSORIO
STRADA 39 TRUST
BANCORP GROWTH MORTGAGE FUND II LTD.
BANCORP BALANCED MORTGAGE FUND II LTD.
BANCORP FINANCIAL SERVICES INC.
PK CAPITAL LTD.
ALL CANADIAN INVESTMENT CORPORATION
FBM CANADA GSD, INC.
MEDINA CONCRETE SERVICES LTD.
TUCUVAN CONSTRUCTION LTD.
OMNI DRYWALL LTD.
1223293 B.C. LTD.
RAHUL GLASS LTD.
SERIN INVESTMENTS LTD.
CLARION PROPERTY CORPORATION
G. I. H. PROPERTIES LTD.
BARRY CHARLES HOLDINGS LTD.
BECISON HOLDING CORPORATION
SANDRA CHAPPELL
CREST CAPITAL CORPORATION
DURHAM CAPITAL MANAGEMENT INC.
YORK VENTURES LTD.
HI-GROVE HOLDINGS (1995) LTD.
DIANE RAUCH
JEFFREY RAUCH
GERHARD RAUCH
HELGA RAUCH
PAVILION INVESTMENTS INC.
RODNEY GRANT KENYON
ALAN LONG
MANDATE MANAGEMENT CORPORATION

Respondents

AFFIDAVIT

I, Alex En Hwa Ng, Licensed Insolvency Trustee, and Chartered Insolvency and Restructuring Professional, of the City of Vancouver, in the Province of British Columbia, SWEAR THAT:

1. I am an employee of D. Manning & Associates Inc., the Receiver and Manager (“Receiver”) herein and as such I have personal knowledge of the matters and facts hereinafter deposed to, except where the same are stated to be based upon information and belief, and where so stated I verily believe the same to be true.
2. That attached hereto and marked Exhibit “A” to this my affidavit is a true copy of a title search of the subject lands conducted on December 5, 2019 showing “Current and Cancelled Information” as of that date.
3. That based on meetings and discussions with Mr. Peter Censorio, my review of pre sales contracts and lists of presales deposits (held and/or refunded by Forbes Boyle Lambert Law Corporation), land title searches and pre-sale disclosure statements as well as a the Project Status Assessment Report conducted by Chysik Project Management conducted February 2, 2020, at true copy of which is attached hereto and marked Exhibit “B” to this my affidavit:
 - a. Construction had completely stopped by December 17, 2019 and by the Receiver’s estimate construction was about 85% complete as of that date and the following was noted;
 - i. Most suites had flooring and cabinetry complete, and some units had installed countertops and finishing carpentry underway,
 - ii. Outstanding work on suites consisted of countertops (in some units), backsplash tile, plumbing fixtures, baseboards and trims for the second pass (ie. in hardwood flooring areas), final paint, light fixtures, fabrication of storage closets and kitchen islands, and wall coverings;
 - b. That as of December 10, 2019, there were 22 pre-sale contracts for 23 residential strata units (two lots were combined into one unit), and one pre-sale contract for the commercial unit. Five residential lots remained unsold as of December 10, 2019

however throughout December, the following six (6) pre-sale contracts on residential lots rescinded their Purchase and Sale Agreements;

- i) SL 2, #102, December 31, 2019,
- ii) SL 7, #205, December 12, 2019,
- iii) SL 8, #207, December 11, 2019,
- iv) SL 15, #305, December 16, 2019,
- v) SL 16, #307, December 15, 2019,
- vi) SL 23, #405, December 13, 2019;

c) The Sixth Amendment to Disclosure Statement, dated December 5, 2019, estimated completion of construction between December 1, 2019 and February 29, 2020 (February 29, 2020 being the “outside date” on the pre-sales);

d) Funding from lenders had ceased and no further funding was forthcoming from the secured lenders and the developer had no apparent viable plan to obtain alternative funding or to re-start construction;

e) All Canadian Investment Corporation had filed a Certificate of Pending Litigation on September 16, 2019 in the amount of \$2,374,468;

f) Unpaid trades were starting to file builders’ liens against the Property;

- i) FBM Canada GSB, Inc., filed November 1, 2019 for \$37,273.13,
- ii) Medina Concrete Services Ltd., filed November 22, 2019 for \$33,332.55,
- iii) Tucuvan Construction Ltd., filed December 6, 2019 for \$41,027.71,
- iv) Omni Drywall Ltd., filed December 13, 2019 for \$86,721.18.

4. I make this Affidavit in support of the Receiver's application to disclaim the Pre-Sales contracts including the contract in respect of the sale of the CRU.

SWORN BEFORE ME at the City of Vancouver, in the Province of British Columbia, this 19th day of June, 2020.

William Choo

A Commissioner for taking Affidavits within British Columbia

Alex En Hwa Ng

Alex En Hwa Ng

WILLIAM CHOO
*A Commissioner for taking Affidavits
for the Province of British Columbia
Suite 520, 625 Howe Street
Vancouver, B.C. V6C 2T6*
Appointment Expires: May 31, 2022

TITLE SEARCH PRINT

File Reference: 22880-0112

2019-12-05, 10:30:08
Requestor: Dionne Riley

****CURRENT AND CANCELLED INFORMATION SHOWN****

Title Issued Under SECTION 98 LAND TITLE ACT

Land Title District NEW WESTMINSTER
Land Title Office NEW WESTMINSTER

Title Number CA5281004
From Title Number CA5118667
CA5118668

Application Received 2016-06-22

Application Entered 2016-06-28

Registered Owner in Fee Simple
Registered Owner/Mailing Address: CENSORIO GROUP (HASTINGS & CARLETON) HOLDINGS LTD.,
INC.NO. BC0905871
2ND FLOOR, 4723 HASTINGS STREET
BURNABY, BC
V5C 2K8

Taxation Authority Burnaby, City of

Description of Land
Parcel Identifier: 029-877-555
Legal Description:
LOT 1 DISTRICT LOT 121 GROUP 1 NEW WESTMINSTER DISTRICT
PLAN EPP56644

Legal Notations
NOTICE OF INTEREST, BUILDERS LIEN ACT (S.3(2)), SEE CA2634884
FILED 2012-07-03
CANCELLED BY CA5335524 2016-07-12

NOTICE OF INTEREST, BUILDERS LIEN ACT (S.3(2)), SEE CA2913038
FILED 2012-12-13
CANCELLED BY CA5335525 2016-07-12

HERETO IS ANNEXED EASEMENT CA3072253 OVER PARCEL A (EXP PLAN 11233) OF
LOTS
29 AND 30 BLOCK 7 DISTRICT LOT 121 GROUP 1 NWD PLAN 1054

This is Exhibit A referred to in
the affidavit of Alex G. H. W.
sworn to before me herein this 19th
day of JUNE 2022
Walter [Signature]
A Commissioner for taking Affidavits
for British Columbia

TITLE SEARCH PRINT

File Reference: 22880-0112

2019-12-05, 10:30:08
Requestor: Dionne Riley

PERSONAL PROPERTY SECURITY ACT NOTICE SEE CA5066844, EXPIRES
2021/03/24
CANCELLED BY CA6353442 2017-10-05

NOTICE OF INTEREST, BUILDERS LIEN ACT (S.3(2)), SEE CA5335526
FILED 2016-07-12

HERETO IS ANNEXED EASEMENT CA6058173 OVER LOT 32 PLAN 1054

Charges, Liens and Interests

Nature:	EASEMENT
Registration Number:	CA3072254
Registration Date and Time:	2013-04-11 10:40
Remarks:	PART FORMERLY PARCEL "A" (EXPLANATORY PLAN 14860) LOTS 29 AND 30 BLOCK 7 DISTRICT LOT 121 GROUP 1 NEW WESTMINSTER DISTRICT PLAN 1054 APPURTENANT TO PARCEL A (EXP PLAN 11233) OF LOTS 29 AND 30 BLOCK 7 DISTRICT LOT 121 GROUP 1 NWD PLAN 1054

Nature:	MORTGAGE
Registration Number:	CA5066842
Registration Date and Time:	2016-03-29 08:32
Registered Owner:	COMPUTERSHARE TRUST COMPANY OF CANADA INCORPORATION NO. A0052313

Cancelled By:	CA6287192
Cancelled Date:	2017-09-10

Nature:	ASSIGNMENT OF RENTS
Registration Number:	CA5066843
Registration Date and Time:	2016-03-29 08:32
Registered Owner:	COMPUTERSHARE TRUST COMPANY OF CANADA INCORPORATION NO. A0052313

Cancelled By:	CA6287193
Cancelled Date:	2017-09-10

Nature:	COVENANT
Registration Number:	CA5281006
Registration Date and Time:	2016-06-22 15:25
Registered Owner:	CITY OF BURNABY

TITLE SEARCH PRINT

File Reference: 22880-0112

2019-12-05, 10:30:18
Requestor: Dionne Riley

Nature: PRIORITY AGREEMENT
 Registration Number: CA5281007
 Registration Date and Time: 2016-06-22 15:25
 Remarks: GRANTING CA5281006 PRIORITY OVER CA5066842 AND CA5066843
Cancelled By: CA6287193
Cancelled Date: 2017-09-10

Nature: COVENANT
 Registration Number: CA5281008
 Registration Date and Time: 2016-06-22 15:25
 Registered Owner: CITY OF BURNABY

Nature: PRIORITY AGREEMENT
 Registration Number: CA5281009
 Registration Date and Time: 2016-06-22 15:25
 Remarks: GRANTING CA5281008 PRIORITY OVER CA5066842 AND CA5066843
Cancelled By: CA6287193
Cancelled Date: 2017-09-10

Nature: COVENANT
 Registration Number: CA5281010
 Registration Date and Time: 2016-06-22 15:25
 Registered Owner: CITY OF BURNABY

Nature: PRIORITY AGREEMENT
 Registration Number: CA5281011
 Registration Date and Time: 2016-06-22 15:25
 Remarks: GRANTING CA5281010 PRIORITY OVER CA5066842 AND CA5066843
Cancelled By: CA6287193
Cancelled Date: 2017-09-10

Nature: COVENANT
 Registration Number: CA5281012
 Registration Date and Time: 2016-06-22 15:25
 Registered Owner: CITY OF BURNABY

Nature: PRIORITY AGREEMENT
 Registration Number: CA5281013
 Registration Date and Time: 2016-06-22 15:25
 Remarks: GRANTING CA5281012 PRIORITY OVER CA5066842 AND CA5066843
Cancelled By: CA6287193
Cancelled Date: 2017-09-10

TITLE SEARCH PRINT

2019-12-05, 10:30:08

File Reference: 22880-0112

Requestor: Dionne Riley

Nature: COVENANT
Registration Number: CA5281014
Registration Date and Time: 2016-06-22 15:25
Registered Owner: CITY OF BURNABY

Nature: PRIORITY AGREEMENT
Registration Number: CA5281015
Registration Date and Time: 2016-06-22 15:25
Remarks: GRANTING CA5281014 PRIORITY OVER CA5066842 AND CA5066843

Cancelled By: CA6287193
Cancelled Date: 2017-09-10

Nature: STATUTORY RIGHT OF WAY
Registration Number: CA5281016
Registration Date and Time: 2016-06-22 15:25
Registered Owner: CITY OF BURNABY
Remarks: PART IN PLAN EPP61155

Nature: PRIORITY AGREEMENT
Registration Number: CA5281017
Registration Date and Time: 2016-06-22 15:25
Remarks: GRANTING CA5281016 PRIORITY OVER CA5066842 AND CA5066843

Cancelled By: CA6287193
Cancelled Date: 2017-09-10

Nature: COVENANT
Registration Number: CA5281018
Registration Date and Time: 2016-06-22 15:25
Registered Owner: CITY OF BURNABY

Nature: PRIORITY AGREEMENT
Registration Number: CA5281019
Registration Date and Time: 2016-06-22 15:25
Remarks: GRANTING CA5281018 PRIORITY OVER CA5066842 AND CA5066843

Cancelled By: CA6287193
Cancelled Date: 2017-09-10

Nature: STATUTORY RIGHT OF WAY
Registration Number: CA5281020
Registration Date and Time: 2016-06-22 15:25
Registered Owner: CITY OF BURNABY
Remarks: PART IN PLAN EPP56645

TITLE SEARCH PRINT

2019-12-05, 10:30:08

File Reference: 22880-0112

Requestor: Dionne Riley

Nature: PRIORITY AGREEMENT
 Registration Number: CA5281021
 Registration Date and Time: 2016-06-22 15:25
 Remarks: GRANTING CA5281020 PRIORITY OVER CA5066842 AND CA5066843
Cancelled By: CA6287193
Cancelled Date: 2017-09-10

Nature: EASEMENT
 Registration Number: CA6058174
 Registration Date and Time: 2017-06-09 13:33
 Remarks: APPURTENANT TO LOT 32 PLAN 1054

Nature: MORTGAGE
 Registration Number: CA6245585
 Registration Date and Time: 2017-08-24 12:05
 Registered Owner: PEOPLES TRUST COMPANY
 INCORPORATION NO. A0033943

Nature: ASSIGNMENT OF RENTS
 Registration Number: CA6245586
 Registration Date and Time: 2017-08-24 12:05
 Registered Owner: PEOPLES TRUST COMPANY
 INCORPORATION NO. A0033943

Nature: MORTGAGE
 Registration Number: CA6245684
 Registration Date and Time: 2017-08-24 12:24
 Registered Owner: BANCORP GROWTH MORTGAGE FUND II LTD.
 INCORPORATION NO. BC0856914
 BANCORP BALANCED MORTGAGE FUND II LTD.
 INCORPORATION NO. BC0856913
 BANCORP FINANCIAL SERVICES INC.
 INCORPORATION NO. BC0712503
 Remarks: MODIFIED BY CA7557828

Nature: ASSIGNMENT OF RENTS
 Registration Number: CA6245685
 Registration Date and Time: 2017-08-24 12:24
 Registered Owner: BANCORP GROWTH MORTGAGE FUND II LTD.
 INCORPORATION NO. BC0856914
 BANCORP BALANCED MORTGAGE FUND II LTD.
 INCORPORATION NO. BC0856913
 BANCORP FINANCIAL SERVICES INC.
 INCORPORATION NO. BC0712503
 Remarks: MODIFIED BY CA7557829

TITLE SEARCH PRINT

2019-12-05, 10:30:08

File Reference: 22880-0112

Requestor: Dionne Riley

Nature: PRIORITY AGREEMENT
 Registration Number: CA6246768
 Registration Date and Time: 2017-08-24 15:16
 Remarks: GRANTING CA6245585 PRIORITY OVER CA6245684 AND CA6245685

Nature: PRIORITY AGREEMENT
 Registration Number: CA6246769
 Registration Date and Time: 2017-08-24 15:16
 Remarks: GRANTING CA6245586 PRIORITY OVER CA6245684 AND CA6245685

Nature: CLAIM OF BUILDERS LIEN
 Registration Number: CA6289357
 Registration Date and Time: 2017-09-11 15:25
 Registered Owner: 1110438 B.C. LTD.
 INCORPORATION NO. 1110438

Cancelled By: CA6299009
Cancelled Date: 2017-09-14

Nature: STATUTORY RIGHT OF WAY
 Registration Number: CA6438021
 Registration Date and Time: 2017-11-10 13:21
 Registered Owner: SHAW CABLESYSTEMS LIMITED
 INCORPORATION NO. A0075382

Nature: STATUTORY RIGHT OF WAY
 Registration Number: CA6555970
 Registration Date and Time: 2018-01-09 15:03
 Registered Owner: BRITISH COLUMBIA HYDRO AND POWER AUTHORITY

Nature: PRIORITY AGREEMENT
 Registration Number: CA6555971
 Registration Date and Time: 2018-01-09 15:03
 Remarks: GRANTING CA6555970 PRIORITY OVER CA6245585, CA6245586, CA6245684 AND CA6245685

Nature: CLAIM OF BUILDERS LIEN
 Registration Number: BB3052911
 Registration Date and Time: 2018-09-28 13:49
 Registered Owner: ELVIS FERNANDO GRAJALES MORENO
Cancelled By: CA7403677
Cancelled Date: 2019-03-20

TITLE SEARCH PRINT

File Reference: 22880-0112

2019-12-05, 10:30:08
Requestor: Dionne Riley

Nature: MORTGAGE
Registration Number: CA7219414
Registration Date and Time: 2018-11-29 15:58
Registered Owner: PK CAPITAL LTD.
INCORPORATION NO. BC1073031

Nature: ASSIGNMENT OF RENTS
Registration Number: CA7219415
Registration Date and Time: 2018-11-29 15:58
Registered Owner: PK CAPITAL LTD.
INCORPORATION NO. BC1073031

Nature: CERTIFICATE OF PENDING LITIGATION
Registration Number: CA7292505
Registration Date and Time: 2019-01-11 14:41
Registered Owner: INFINITY CONCRETE RESTORATION INC.
INCORPORATION NO. 1134927

Cancelled By: CA7403676
Cancelled Date: 2019-03-20

Nature: CLAIM OF BUILDERS LIEN
Registration Number: CA7389257
Registration Date and Time: 2019-03-12 12:46
Registered Owner: A.C. CIVIL CONTRACTING LTD.
INCORPORATION NO. BC0912140

Cancelled By: CA7402775
Cancelled Date: 2019-03-20

Nature: PRIORITY AGREEMENT
Registration Number: CA7392238
Registration Date and Time: 2019-03-13 15:43
Remarks: GRANTING CA6245585 PRIORITY OVER CA7219414 AND
CA7219415

Nature: PRIORITY AGREEMENT
Registration Number: CA7392239
Registration Date and Time: 2019-03-13 15:43
Remarks: GRANTING CA6245586 PRIORITY OVER CA7219414 AND
CA7219415

Nature: CLAIM OF BUILDERS LIEN
Registration Number: CA7517604
Registration Date and Time: 2019-05-23 17:00
Registered Owner: MATAKANA SCAFFOLDING B.C. INC.
INCORPORATION NO. BC0683439

Cancelled By: CA7590848
Cancelled Date: 2019-06-28

TITLE SEARCH PRINT

File Reference: 22880-0112

2019-12-05, 10:30:28
Requestor: Dionne Riley

Nature: MODIFICATION
Registration Number: CA7557828
Registration Date and Time: 2019-06-13 12:25
Remarks: MODIFICATION OF CA6245684

Nature: MODIFICATION
Registration Number: CA7557829
Registration Date and Time: 2019-06-13 12:25
Remarks: MODIFICATION OF CA6245685

Nature: PRIORITY AGREEMENT
Registration Number: CA7558004
Registration Date and Time: 2019-06-13 13:09
Remarks: GRANTING CA6245684 AND CA7557828 PRIORITY OVER CA7219414 AND CA7219415

Nature: PRIORITY AGREEMENT
Registration Number: CA7558005
Registration Date and Time: 2019-06-13 13:09
Remarks: GRANTING CA6245685 AND CA7557829 PRIORITY OVER CA7219414 AND CA7219415

Nature: CLAIM OF BUILDERS LIEN
Registration Number: CA7630242
Registration Date and Time: 2019-07-18 11:20
Registered Owner: INSUL-TWIN SYSTEMS LTD.
INCORPORATION NO. BC1090233
Cancelled By: CA7755413
Cancelled Date: 2019-09-18

Nature: CLAIM OF BUILDERS LIEN
Registration Number: CA7705173
Registration Date and Time: 2019-08-23 15:51
Registered Owner: SEAGATE STRUCTURES LTD.
INCORPORATION NO. BC1076918
Cancelled By: CA7735757
Cancelled Date: 2019-09-09

Nature: CERTIFICATE OF PENDING LITIGATION
Registration Number: CA7750158
Registration Date and Time: 2019-09-16 14:27
Registered Owner: ALL CANADIAN INVESTMENT CORPORATION

TITLE SEARCH PRINT

2019-12-05, 10:30:08
Requestor: Dionne Riley

File Reference: 22880-0112

Nature: CLAIM OF BUILDERS LIEN
Registration Number: CA7847746
Registration Date and Time: 2019-11-01 12:15
Registered Owner: FBM CANADA GSD, INC.
INCORPORATION NO. A0093560

Nature: CLAIM OF BUILDERS LIEN
Registration Number: CA7883860
Registration Date and Time: 2019-11-22 09:35
Registered Owner: MEDINA CONCRETE SERVICES LTD.
INCORPORATION NO. BC0839535

Duplicate Infeasible Title NONE OUTSTANDING

Transfers NONE

Pending Applications NONE

Corrections

CR28680 2016-10-14 15:28:53 CHARGE REMARKS CORRECTED CA5281021

Project Status Assessment Report

Report Date: February 2nd, 2020

Project Address: 4223 Hastings Street, Burnaby

Date of Site Review: February 1st, 2020

This is Exhibit "B" referred to in
the affidavit of Audrey H. Ng

sworn to before me herein this 19th

day of July 2020

Walter Avo

A Commissioner for taking Affidavits
for British Columbia

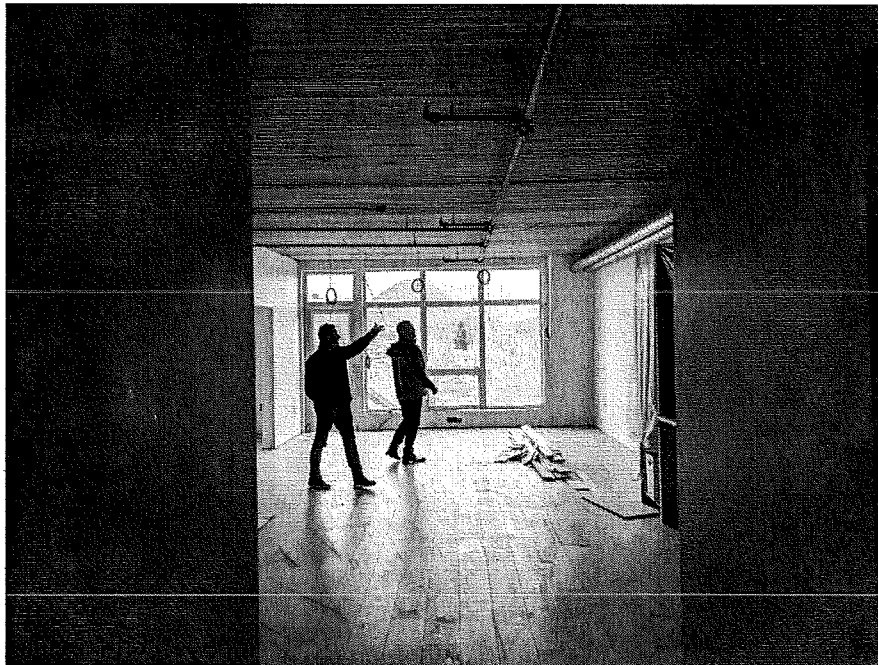
Project Schedule Review & Duration to Completion

The suites of the project typically have all flooring, cabinetry complete with some units with installed countertops and finishing carpentry underway.

Outstanding Work within the units typically consists of:

- Countertops (some units)
- Backsplash tile
- Plumbing fixtures
- Baseboards, trims for second pass (ie. in hardwood flooring areas)
- Final paint
- Light Fixtures
- Fabrication of storage closets and kitchen islands (some material on site)
- Window Coverings

Pictures of Suites:





Pictures of Common Areas:

Corridor:



Stairs at top level:



Main Lobby Looking North to access Corridor (leading to elevator):



North Elevation of Building:



It is our estimate that based on the current status of the project that it will take **approximately 3 – 3 ½ Months to obtain an occupancy permit based on the resolution of all outstanding trade contracts or the**

engagement of new contractors. The timeline may also be affected if long lead time items or the approval of shop drawings has not been finalized (ie. for aluminum guardrails) as well as the time it takes to engage new trades or resolve contract/payments with existing contractors.

Project Cost Review & Cost to Complete Analysis

Based on the current project status and analyzing the construction schedule to complete it is our assessment that the approximate costs to complete the project to Occupancy should not exceed \$1,560,000.00. This number is approximate due to the need to confirm what scope of work items have been paid for and are in progress along with the fact that the developer had planned to do a substantial amount of self performed work. This would work not have been tracked as a cost to complete through the trade contracts, therefore needs allowances within a cost to complete budget.

Rough Divisional Budget – Cost to Complete

				28
Div		Description	Total - 28 Units	Per Unit Cost
1		General Requirements	\$ 292,200.00	\$ 10,435.71
2		Site Work	\$ 66,000.00	\$ 2,357.14
3		Concrete	\$ 28,500.00	\$ 1,017.86
4		Masonry	\$ 1,000.00	\$ 35.71
5		Metals	\$ 92,500.00	\$ 3,303.57
6		Woods & Plastics	\$ 169,000.00	\$ 6,035.71
7		Thermal & Moisture	\$ 67,000.00	\$ 2,392.86
8		Doors & Windows	\$ 26,500.00	\$ 946.43
9		Finishes	\$ 240,000.00	\$ 8,571.43
10		Specialties	\$ 150,000.00	\$ 5,357.14
11		Equipment	\$ 115,000.00	\$ 4,107.14
15		Mechanical	\$ 125,000.00	\$ 4,464.29
16		Electrical	\$ 185,000.00	\$ 6,607.14
		Total Construction Hard Costs	\$ 1,557,700.00	\$ 55,632.14

Summary of Findings:

Cost to Complete: **Approximately \$1.5 Million**

Schedule to Occupancy: **Approximately 3 Months**

No. H-200039
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH
COLUMBIA**

BETWEEN:

PEOPLES TRUST COMPANY

Petitioner

AND:

CENSORIO GROUP (HASTINGS & CARLETON)
HOLDINGS LTD., PETER CENSORIO also known as PETER
ANTHONEY CENSORIO and PETER ANTHONY CENSORIO,
STRADA 39 TRUST, BANCORP GROWTH MORTGAGE FUND II
LTD., BANCORP BALANCED MORTGAGE FUND II LTD.,
BANCORP FINANCIAL SERVICES INC., PK CAPITAL LTD., ALL
CANADIAN INVESTMENT CORPORATION, FBM CANADA GSD,
INC., MEDINA CONCRETE SERVICES LTD., TUCUVAN
CONSTRUCTION LTD., OMNI DRYWALL LTD., 1223293 B.C.
LTD., RAHUL GLASS LTD., SERIN INVESTMENTS LTD.,
CLARION PROPERTY CORPORATION, G. I. H. PROPERTIES
LTD., BARRY CHARLES HOLDINGS LTD., BECISON HOLDING
CORPORATION, SANDRA CHAPPELL, CREST CAPITAL
CORPORATION, DURHAM CAPITAL MANAGEMENT INC.,
YORK VENTURES LTD., HI-GROVE HOLDINGS (1995) LTD.,
DIANE RAUCH, JEFFREY RAUCH, GERHARD RAUCH, HELGA
RAUCH, PAVILION INVESTMENTS INC., RODNEY GRANT
KENYON, ALAN LONG and MANDATE MANAGEMENT
CORPORATION

AFFIDAVIT

OWEN BIRD LAW CORPORATION
P.O. Box 49130
Three Bentall Centre
2900 - 595 Burrard Street
Vancouver, BC V7X 1J5
Attention: Alan A. Frydenlund, Q.C.
File No. 23024-0093