



FORM 32 (RULE 8-1(4))

This is the 1st affidavit
of Antonia Chen in this case
and was made on October 4, 2021

No. S214959
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

ADC HOLDINGS LTD.

Petitioner

AND:

JEANA VENTURES LTD. and 1449 SANDHURST PLACE
HOLDINGS LIMITED

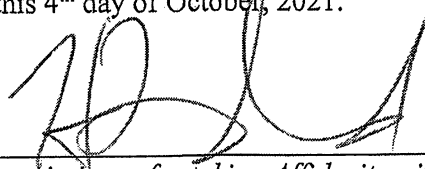
Respondents

AFFIDAVIT

I, ANTONIA CHEN, legal assistant, of 2900 – 595 Burrard Street, in the City of Vancouver, in the Province of British Columbia, SWEAR THAT:

1. I am a legal assistant of the law firm of OWEN BIRD LAW CORPORATION, solicitors for the Receiver and Manager of the assets, undertakings and property of 1449 Sandhurst Place Holdings Limited (the “**Company**”), D. Manning & Associates Inc., (the “**Receiver Manager**”) and as such 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. Capitalized terms are defined in the Notice of Application, filed September 22, 2021.
3. Attached hereto and marked Exhibit “A” to this my Affidavit is a copy of an invoice dated September 29, 2021 issued by Synergy Business Lawyers LLP in the sum of \$4,718.82 with a remaining balance due in the amount of \$2,218.82 for services in connection to the sale of the Lands.
4. Attached hereto and marked Exhibit “B” to this my Affidavit is a copy of email correspondence dated September 29, 2021 from William Choo to Heather Frydenlund, approving the above invoice

This is Exhibit "A" referred to in the Affidavit of Antonia Chen sworn before me at Vancouver, BC, this 4th day of October, 2021.



A Commissioner for taking Affidavits within British Columbia

HEATHER A. FRYDENLUND
Barrister & Solicitor
P.O. Box 49130
2900-595 BARRARD STREET
VANCOUVER, B.C. V7X 1J5
(604) 691-7532

SYNERGY BUSINESS LAWYERS LLP

Suite 2300 - 925 West Georgia Street
Vancouver, BC Canada V6C 3L2
Tel: 604.685.8186 / Fax: 604.685.8187

INVOICE

September 29, 2021
1449 Sandhurst Place Holdings Limited
200 - 100 Park Royal S
West Vancouver, B.C. V7T 1A2

Invoice No: 89252
File No: 14050-02

Attention: Phil Garrow


Re: Sale of 1449 Sandhurst Place, West Vancouver

Please find enclosed our invoice for professional services rendered to date with respect to the above noted matter, which we trust you will find to be in order. As all accounts are due and payable when rendered, we have attached our payment options sheet for your convenience.

If you have any questions with respect to the enclosed account, please do not hesitate to contact me or my assistant.

CURRENT INVOICE TOTAL (\$206.14 GST included)	<u>\$4,718.82</u>
Less funds transferred from Trust:	<u>\$2,500.00</u>
BALANCE DUE AND OWING:	<u>\$2,218.82</u>

SYNERGY BUSINESS LAWYERS LLP

per: 
Brian E. Rudy
E. & O. E.

per

ACCOUNTS ARE DUE WHEN RENDERED
INTEREST IN THE AMOUNT OF 18% PER ANNUM WILL BE CHARGED ON OVERDUE ACCOUNTS

G.S.T. REGISTRATION NUMBER 811418250 RT0001

September 29, 2021
 Invoice No. 89252

Page 2

To Professional Services rendered in connection with the following matter:
 Re: Sale of 1449 Sandhurst Place, West Vancouver

DATE	DESCRIPTION
08/10/21	Review and reply to email from receiver's lawyer.
08/10/21	Review and reply to email from receiver's lawyer. Email to purchaser's lawyer regarding extension .
08/10/21	Follow up on payout statements.
08/17/21	Run through e-conveyance with articulated student. NO CHARGE
08/17/21	Review file.
08/25/21	Review and reply to email from Receiver's counsel. Provide instructions to articulated student.
08/25/21	Request payout statements via e-convey.
08/26/21	Review and reply to email from mortgagee.
08/26/21	Send emails regarding payout statements.
08/27/21	Review and reply email from receiver's lawyer. Email to articulated student.
08/30/21	Send email to Ziba with vesting order.
08/30/21	Send email to Michael Wilson for payout statement
08/30/21	Input information into eConvey.
08/31/21	Call with Phil Garrow. Prepare documents.
08/31/21	Review and reply to email from receiver.
08/31/21	Generate order to pay and send to receiver counsel for confirmation.
08/31/21	Obtain updated property tax certificate.
08/31/21	Review documents on econvey.
09/01/21	Review letter. Send documents for signature with client. Email with purchaser's lawyer regarding debris. Email to get instructions. Update order to pay.
09/01/21	Review returned documents and provide instructions to articulated student.
09/01/21	Update precedent letter to buyer's lawyer.
09/01/21	Letter to buyer's lawyer.
09/02/21	Provide instructions to articulated student. Email with receiver's counsel. Email with purchaser's counsel.
09/02/21	Call receiver regarding certified copy of order; email documents to conveyer.
09/03/21	Email to purchaser's lawyer regarding closing timing. Get instructions from client. Provide instructions. Attend to closing. Provide instructions to assistant.

09/03/21	Amend undertaking letter and instruct legal assistant regarding courier.
09/03/21	Research vacant possession.
09/03/21	Update order to pay statement.
09/03/21	Send emails to receiver and purchaser counsel.
09/07/21	Conference regarding closing.
09/07/21	Review funds and direction and attend to pay outs from trust.
09/07/21	Prepare payout order letters.
09/15/21	Draft reporting letter.
09/15/21	Compile reporting letter.
09/17/21	Obtain personal property registry search.
09/17/21	Email to Pursuit Capital counsel regarding Personal Property Security Act charge.
09/17/21	Email to Pursuit Capital counsel with Personal Property Registry search.
09/28/21	Prepare and review corrective declaration. Call with H. Frydenlund.
09/28/21	Prepare Land Title Office declaration and email to lawyer.

TOTAL FEES:		4,379.25
	500.00	
	Total Fees After Discount	\$3,879.25

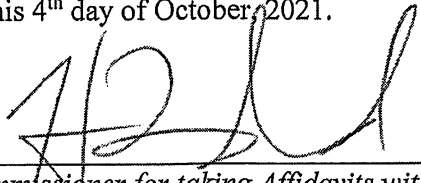
DISBURSEMENTS

Conveyance filing fee	75.00
Courier	118.01
BC Land Title & Survey	1.67
Reprographics	33.95
BC Online*	3.00
Cheque certification fee*	15.00
Conveyance filing fee*	5.25
BC Land Title & Survey*	65.00
Searches - External*	30.00

Trust Administration Fee	15.00	
TOTAL DISBURSEMENTS:		\$361.88
GST on Fees & Disbursements		\$206.14
PST on Fees		271.55
		<hr/>
TOTAL FEES, DISBURSEMENTS & TAX:		\$4,718.82
THIS IS OUR ACCOUNT		<hr/>

*tax-exempt

This is Exhibit "B" referred to in the Affidavit of Antonia Chen sworn before me at Vancouver, BC, this 4th day of October, 2021.



*A Commissioner for taking Affidavits within
British Columbia*

HEATHER A. FRYDENLUND
Barrister & Solicitor
P.O. Box 49130
2900-595 BARRARD STREET
VANCOUVER, B.C. V7X 1J5
(604) 691-7532

Antonia Chen

From: William Choo [mailto:wc@manning-trustee.com]
Sent: September 29, 2021 12:05 PM
To: Heather Frydenlund <hfydenlund@owenbird.com>
Subject: FW: SYNERGY BUSINESS LAWYERS LLP - INVOICE - (14050-02)

Hi Heather:

We approve this legal invoice for payment subject to the Court approving payment of the balance due to Synergy Business Lawyers LLP in the amount of \$2,218.82 from a further holdback required from funds in the Receiver Manager's trust account.

Regards,

William Choo CPA, CGA
D. Manning & Associates Inc.
Licensed Insolvency Trustee
520-625 Howe Street
Vancouver, BC V6C 2T6
Tel: (604) 683-8030
Fax: (604) 683-8327
www.manning-trustee.com

From: Heather Frydenlund <hfydenlund@owenbird.com>
Sent: September 29, 2021 12:00 PM
To: William Choo <wc@manning-trustee.com>
Subject: FW: SYNERGY BUSINESS LAWYERS LLP - INVOICE - (14050-02)

Hi William,

See attached invoice for 1149 Sandhurst from Dalene Visser. Still have not received the GST certificate as of yet.

Thank you,

Heather A. Frydenlund
Barrister & Solicitor

Direct Line (604) 691-7532 | Direct Fax (604) 632-4459
Email hrydenlund@owenbird.com



Bentall 3, Suite 2900, 595 Burrard Street
PO Box 49130, Vancouver, BC V7X 1J5 Canada
Telephone (604) 688-0401 | Fax (604) 688-2827
www.owenbird.com



From: Arishma Sharma [<mailto:asharma@Synergylaw.ca>]
Sent: September 29, 2021 11:44 AM
To: Heather Frydenlund <hrydenlund@owenbird.com>
Subject: SYNERGY BUSINESS LAWYERS LLP - INVOICE - (14050-02)

CAUTION: This email originated from outside of the organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning Heather,

Please see attached invoice pertaining to 1449 Sandhurst Place Holdings Limited.

Do not hesitate to contact us should you have any questions.

Yours truly,

Arishma Sharma
Administrative Assistant

SYNERGY BUSINESS LAWYERS LLP

#2300 - 925 West Georgia Street
Vancouver, BC V6C 3L2

Tel : 604.685.8186 | Fax : 604.685.8187
E-mail : asharma@synergylaw.ca
Web: <http://www.synergylaw.ca/>

This message and any attachments are intended only for the addressee(s) and may contain privileged or confidential information. Any unauthorized disclosure is strictly prohibited. If you have received this message in error, please notify us immediately so that we may correct our internal records. Please then permanently delete the original message and any attachments and destroy any copies. Thank you.

This e-mail may contain privileged and confidential material and its transmission is not a waiver of that privilege. It is intended for the sole use of the person to whom it is addressed. Any copying, disclosure, distribution or reliance on this material by anyone other than the intended recipient is strictly prohibited. We assume no responsibility to persons other than the intended recipient. If you have received this transmission in error, please notify Owen Bird Law Corporation immediately and destroy any hard copies you may have printed and remove all copies of the e-mail from your mailbox and hard drives.

No. S214959
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH
COLUMBIA**

BETWEEN:

ADC HOLDINGS LTD.

Petitioner

AND:

JEANA VENTURES LTD. and 1449 SANDHURST PLACE
HOLDINGS LIMITED

Respondents

AFFIDAVIT

OWEN BIRD LAW CORPORATION
P.O. Box 49130
Three Bentall Centre
2900-595 Burrard Street
Vancouver, B.C.
V7X 1J5
Tel: (604) 688-0401
Fax: (604) 632-4458

Attention: Heather A. Frydenlund
File No. 23024-0131