



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

This is the 1st Affidavit  
of ALAN A. FRYDENLUND, K.C. in this case  
and was made on July 30, 2024

No. H-230320  
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

BETWEEN:

LANYARD INVESTMENTS INC. as general partner of LFC  
KESEF-B21 LIMITED PARTNERSHIP  
FISGARD CAPITAL CORPORATION

Petitioners

And

AC NANAIMO INVESTMENT GP LTD.  
AC NANAIMO INVESTMENT LIMITED PARTNERSHIP  
AC NANAIMO NOMINEE LTD. formerly known as ANSEN  
NANAIMO 26 DEVELOPMENT BARE TRUSTEE LTD.  
COROMANDEL HOLDINGS LTD.  
ZHEN YU ZHONG also known as ZHENYU ZHONG  
JUN CHAO MO also known as JUNCHAO MO  
ALIGN BC PROPERTIES CORP. formerly known as VIVAGRAN  
DEVELOPMENT CORP.  
ZHONG LIANG  
XINTAI LIU  
YING LIANG  
CHENMING LI  
JOHN DOE  
ALL TENANTS OR OCCUPIERS OF THE SUBJECT LANDS AND PREMISES

Respondents

**AFFIDAVIT**

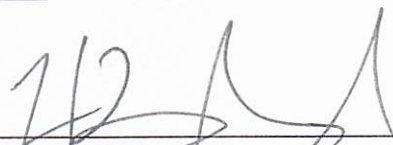
I, ALAN A. FRYDENLUND, K.C., of 2900 – 733 Seymour Street, in the City of Vancouver,  
in the Province of British Columbia, SWEAR THAT:

1. I am a shareholder of OWEN BIRD LAW CORPORATION, solicitors for the Receiver herein  
D. Manning & Associates Inc. (the “Receiver”), 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. The members and staff of our firm acting for the Receiver were the following with their respective call dates and hourly rates noted:
  - a. the deponent, 1983 at \$750 in 2023, recording 48.8 hours; and
  - b. the deponent, 1983 at \$850 in 2024, recording 12.2 hours.
3. I have reviewed the time entries recorded for this matter and believe them to be accurate and necessary to perform the professional services required by the Receiver.
4. I anticipate that professional fees and disbursements for matters relating to and including the passing of the Receiver's accounts and discharge to be \$10,000 inclusive of disbursements and taxes.
5. I swear this affidavit in support of a summary passing of the Receiver's accounts.

SWORN BEFORE ME at Vancouver, B.C.,  
this 30<sup>th</sup> day of July, 2024.

  
\_\_\_\_\_  
A Commissioner for taking Affidavits within  
British Columbia

  
\_\_\_\_\_  
ALAN A. FRYDENLUND, K.C.

HEATHER A. FRYDENLUND  
*Barrister & Solicitor*  
P.O. Box 1  
2900-733 SEYMOUR STREET  
VANCOUVER, B.C. V6B 0S6  
(604) 691-7532

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**AFFIDAVIT**

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OWEN BIRD LAW CORPORATION  
P.O. Box 1  
Vancouver Centre II  
2900 – 733 Seymour Street  
Vancouver, V6B 0S6  
Attention: Heather A. Frydenlund  
File No. 23024-0137