



NO. S-243389
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN BANKRUPTCY AND INSOLVENCY

IN THE MATTER OF THE RECEIVERSHIP OF
ECOASIS DEVELOPMENTS LLP AND OTHERS

BETWEEN:

SANOVEST HOLDINGS LTD.

PETITIONER

AND:

ECOASIS DEVELOPMENTS LLP, ECOASIS BEAR MOUNTAIN DEVELOPMENTS LTD., ECOASIS RESORT AND GOLF LLP, 0884185 B.C. LTD., 0884188 B.C. LTD., 0884190 B.C. LTD., 0884194 B.C. LTD., BM 81/82 LANDS LTD., BM 83 LANDS LTD., BM 84 LANDS LTD., BM CAPELLA LANDS LTD., BM HIGHLANDS GOLF COURSE LTD., BM HIGHLANDS LANDS LTD., BM MOUNTAIN GOLF COURSE LTD. and BEAR MOUNTAIN ADVENTURES LTD.

RESPONDENTS

**APPLICATION RESPONSE
(RE: DIRECTIONS)**

Application Response of: 599315 B.C. Ltd. ("599") and Daniel Matthews ("Matthews", together with 599, the "Application Respondents")

THIS IS A RESPONSE TO the Notice of Application of Alvarez & Marsal Canada Inc., in its capacity as Court-appointed receiver (the "Receiver") of Ecoasis Developments LLP, Ecoasis Bear Mountain Developments Ltd., 0884185 B.C. Ltd., 0884188 B.C. Ltd., 0884190 B.C. Ltd., 0884194 B.C. Ltd., BM 81/82 Lands Ltd., BM 83 Lands Ltd., BM 84 Lands Ltd., BM Capella Lands Ltd., BM Highlands Golf Course Ltd., BM Highlands Lands Ltd., BM Mountain Golf Course Ltd., certain lands of Bear Mountain Adventures Ltd., and any interests in real property of Ecoasis Resort and Golf LLP, filed January 24, 2025.

The Application Respondents estimate that the application will take 2.5 hours.

Part 1: ORDERS CONSENTED TO

The Application Respondents' position on the granting of the directions set out in Paragraph 1 of Part 1 of the Notice of Application is that: the Reports (as defined in the Notice of Application)

ought not be filed with the Court at this time. In the alternative, if the Reports, or any of them, are directed to be filed with the Court, they should be filed under seal, and in the further alternative, filed subject to redactions.

Part 2: ORDERS OPPOSED

N/A

Part 3: ORDERS ON WHICH NO POSITION IS TAKEN

N/A

Part 4: FACTUAL BASIS

1. For reasons set out in the Applicant Respondents' Notice of Application to be spoken to on January 30, 2025 (the "**Application**"), the Reports ought not be filed with the Court at this time. In the alternative, if the Reports, or any of them, are directed to be filed with the Court, they should be filed under seal, and in the further alternative, filed subject to redactions.

Part 5: LEGAL BASIS



2. The Application Respondents repeat and rely on the legal basis section as stated in the Application.

Part 6: MATERIAL TO BE RELIED ON

1. Affidavit #1 of Daniel Matthews filed June 17, 2024.
2. Affidavit #2 of Daniel Matthews (sealed) filed September 12, 2024.
3. Affidavit #3 of Daniel Matthews to be affirmed (unfiled, sealing order sought).

☒ The Application Respondents have filed in this proceeding a document that contains the Application Respondents' address for service.

Dated at the City of Vancouver, in the Province of British Columbia, this 28th day of January, 2025.

 
 Lawson Lundell LLP
 Solicitors for Daniel Matthews and
 599315 B.C. Ltd.

This Application Response is filed by William L. Roberts / Gordon Brandt, of the law firm of Lawson Lundell LLP, whose place of business and address for delivery is 1600 – 925 West Georgia

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APPLICATION RESPONSE



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Attention: Gordon Brandt/rgc