



No. S015937  
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

BETWEEN:

BANK OF CHINA

PLAINTIFF/JUDGMENT CREDITOR

AND:

XU CHAO FAN, also known as Hui Yat Fai;  
XU GAO JUN, also known as Xu Juo Jun, Xu Guo Jun, Kit Sun Hui; Hui Kit Shun  
Hui Kit Sun and Hui Kit Chun;  
YU ZHEN DONG, also known as Xu Zhen Dong, Yu Zhen-Dong, Yu Wing Chung,  
Yu Zhan Dong, Yu Wing Chong and Yu Chun Tung;  
KWONG WA PO;  
CINDY CHING YIU-CHU, also known as Sindy Ching, Ching Yu-Chu Sindy, Ching  
Fo-Chu and Ching Yu-Chu;  
KUANG WAN FANG, also known as Wendy Wan Fang Kuang;  
YING YI YU, also known as Yu Yung Yi;  
FION XU HUI YU, also known as Fion Yu and Xu Hu Yu;  
LI CONG XU  
SIU LING YAN  
XIA LI XU, also known as Carolyn Xia Li Xu and Carolyn X Xu;  
FAL KWONG CHING, also known as Fo Kong Ching, Fo Kong Cheung and Connie  
Fal Kwong Ching;  
WEN JING TAN;  
XU LIE MING;  
XU GANG QIANG;  
XU BIN YAN;  
TANG JIE YU, also known as Jie Yu Tang, Tan Jie Yu and Jie Yu Tan;  
YU BAO QUON, also known as Bao Quon Yu, Yu Bao Quan and Quan Bao Yu;  
LIANG BIN JIN;  
LIANG CUI E; and  
JOHN DOE

DEFENDANTS/JUDGMENT DEBTORS

**APPLICATION RESPONSE**

**Application response of:** Kuang Wan Fang, (the "application respondent")

THIS IS A RESPONSE TO the notice of application of the Bank of China filed January 6, 2023.

## **PART 1 ORDERS CONSENTED TO**

The application respondent consents to the granting of ALL of the orders set out in paragraph 1 of Part 1 of the notice of application.

## **PART 2 ORDERS OPPOSED**

The application respondent opposes the granting of NONE of the orders set out in paragraphs of Part 1 of the notice of application.

## **PART 3 ORDERS ON WHICH NO POSITION IS TAKEN**

The application respondent takes no position on the granting of NONE of the orders set out in paragraphs of Part 1 of the notice of application.

## **PART 4 FACTUAL BASIS**

1. I received an English and translated copies of the Notice of Application of the Bank of China to appoint Alvarez & Marsal Canada Inc. as receiver over all of my assets, property and undertakings in Canada (the "**Receiver**"), and the Affidavit of Wen-Shih Yang.
2. I am the registered owner of the Property (as defined in the Notice of Application).
3. I am currently located in Kaiping, Guangdong, People's Republic of China. I have no intention of coming to Canada.
4. In order to reduce my indebtedness to the Bank of China, I consent to the appointment of the Receiver.

## **PART 5 LEGAL BASIS**

1. None

## **PART 6 MATERIAL TO BE RELIED ON**

1. Affidavit #1 of Kuang Wan Fang, made January 16, 2023.

The application respondent estimates that the application will take 30 minutes.

☐ The application respondent has filed in this proceeding a document that contains the application respondent's address for service.

☐ The application respondent has not filed in this proceeding a document that contains an address for service. The application respondent's ADDRESS FOR SERVICE is:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2023-1-17  
Dated

王婉芳  
Signature of the application respondent  
Kuang Wan Fang

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Guo Jun, Kit Sun Hui; Hui Kit Shun Hui Kit Sun  
and Hui Kit Chun;  
YU ZHEN DONG, also known as Xu Zhen  
Dong, Yu Zhen-Dong, Yu Wing Chung, Yu  
Zhan Dong, Yu Wing Chong and Yu Chun  
Tung;  
KWONG WA PO;  
CINDY CHING YIU-CHU, also known as Sindy  
Ching, Ching Yu-Chu Sindy, Ching Fo-Chu and  
Ching Yu-Chu;  
KUANG WAN FANG, also known as Wendy  
Wan Fang Kuang;  
And others

DEFENDANTS/JUDGMENT DEBTORS

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**APPLICATION RESPONSE**

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JDB/day