



This is the 1st Affidavit
of Anthony Tillman in this case
and was made on April 20, 2023

No. H220369
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

PLW INVESTMENT LTD.

PETITIONER

AND:

1025332 B.C. LTD. and others

RESPONDENTS

AFFIDAVIT

I, Anthony Tillman, Senior Vice-President, of Suite 902 - 925 West Georgia Street, Vancouver, British Columbia, SWEAR THAT:

1. I am a Senior Vice-President at Alvarez & Marsal Canada Inc., Licensed Insolvency Trustees ("A&M"), receiver and manager (the "**Receiver**") over certain land and personal property of certain of the Respondents as set out in the Receivership Order of Justice Giaschi dated October 27, 2022, and as such have personal knowledge of the matters deposed to in this affidavit, except where stated to be on information and belief, in which case I verily believe them to be true.
2. I am the licensed insolvency trustee at A&M that has had primary carriage of this matter, and I am authorized to make this affidavit on behalf of the Receiver.
3. On or about April 5, 2023, the Receiver's counsel, Jordan Schultz of Dentons Canada LLP ("Dentons"), made inquiries of Neil Kornfeld, of Kornfeld Law LLP, counsel for the Respondents over the existence of insurance for the subject lands and properties in the within proceedings.

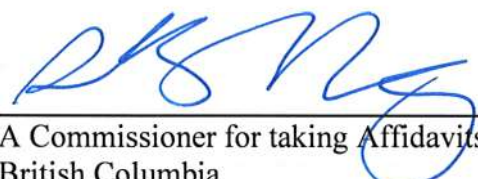
4. On April 7, 2023 I emailed Amy Washington attaching a letter making certain inquiries, including with respect to proof of insurance for all lands and properties. Attached hereto and marked as **Exhibit "A"** is a true copy of this email and attachment.

5. On April 10, 2023, I spoke with Ms. Washington over the phone and was told that she would get back to me after speaking with her counsel. I did not hear from her again.

6. On April 11, 2023, Jordan Schultz of Dentons, forwarded me an exchange he had with Mr. Kornfeld including following up on my letter and inquiries over the existence of insurance. Attached hereto and marked as **Exhibit "B"** is a true copy of this email exchange.

7. I am told by Mr. Schultz and verily believe that he followed up with Mr. Kornfeld several times and was never provided with the requested documents and information, including proof of insurance.

SWORN BEFORE ME at Vancouver,
British Columbia, on April 20, 2023.



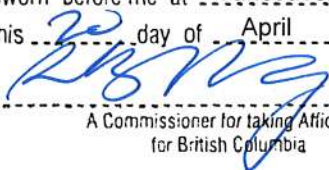
A Commissioner for taking Affidavits for
British Columbia



ANTHONY TILLMAN

REBECCA BARCLAY NGUINAMBAYE
Barrister & Solicitor
Fasken Martineau DuMoulin LLP
2900 - 550 Burrard Street
Vancouver, BC V6C 0A3
604 631 5245

This is Exhibit " A " referred to in the af-
fidavit of Anthony Tillman
sworn before me at Vancouver
this 22 day of April 2023


A Commissioner for taking Affidavits
for British Columbia

From: Tillman, Anthony <atillman@alvarezandmarsal.com>
Sent: April-07-23 10:30 AM
To: amy@washingtonproperties.ca
Cc: jessie@washingtonproperties.ca; Neil Kornfeld <nkornfeld@kornfeldllp.com>; Virmani, Nishant <nvirmani@alvarezandmarsal.com>; Lee, Marianna <marianna.lee@alvarezandmarsal.com>; Jordan Schultz (jordan.schultz@dentons.com) <jordan.schultz@dentons.com>
Subject: In the Matter of the Receivership of the Washington Properties

Hello Mrs. Washington,

Please see the attached letter and order.

We are expecting your timely cooperation with our requests and are available to discuss as needed.

Anthony Tillman, CPA, CA
Managing Director
Alvarez & Marsal Canada
Cathedral Place Building
925 West Georgia Street, Suite 902
Vancouver, BC V6C 3L2
Direct: +1 604 639 0849
Mobile: +1 604 218 9152
atillman@alvarezandmarsal.com
AlvarezandMarsal.com
Alvarez & Marsal employs CPAs but is not a licensed CPA firm



SENT VIA EMAIL AND MAIL

April 7, 2023

1025332 B.C. Ltd., 1025334 B.C. Ltd., 1025336 B.C. Ltd.,
Chongye Developments Ltd., Washington Properties (Point Grey) Inc.,
Washington Properties (QEP) Inc., Lucky Five Investments Ltd.,
1094321 B.C. Ltd., Prada Developments Corporation,
1256306 B.C. Ltd., 1256319 B.C. Ltd.,
Edison Washington (a.k.a. Qiang Wang), and Linda Washington
c/o Mrs. Amy Barsha Washington
505 Burrard St. #1100
Vancouver, B.C. V7X 1M5

Dear Mrs. Washington,

Re: In the Matter of the Receivership of Certain Land and Other Assets, Undertakings and Property of 1025332 B.C. Ltd., 1025334 B.C. Ltd., 1025336 B.C. Ltd., Chongye Developments Ltd., Washington Properties (Point Grey) Inc., Washington Properties (QEP) Inc., Lucky Five Investments Ltd., 1094321 B.C. Ltd., Prada Developments Corporation, 1256306 B.C. Ltd., 1256319 B.C. Ltd., Amy Barsha Washington (a.k.a. Fengyun Shao), Edison Washington (a.k.a. Qiang Wang), and Linda Washington (collectively, the "Debtors")

Please be advised that on October 27, 2022, Alvarez & Marsal Canada Inc. was appointed by an order (the "Order") of the Supreme Court of British Columbia (the "Court") as receiver and manager (the "Receiver") without security, of certain lands and other assets, undertakings and property of the Debtors (the "Washington Properties"). The Court issued subsequent orders staying the Order until April 7, 2023. A copy of the Order is attached herewith for your reference.

We suggest that you review the Order in detail (and with counsel) and direct you to:

- Section 2 of the Order where you will note that the Receiver is, amongst other things, empowered to take possession and control of the Washington Properties, receive and collect monies owing in respect of the Washington Properties, and market and sell the Washington Properties; and
- Section 3 of the Order where you will note the duty to provide access and cooperation with the Receiver.

The Receiver requests from you the following information in respect of those lands and properties enumerated in Schedule B of the Order:

1. Proof of insurance for all land and properties;
2. Copies of rental agreements for leased units, including contact information of the tenants, status of rent payments and arrears (if any);
3. List of bank accounts related to the land and properties, including recent bank statements;
4. Statements of account for any outstanding debt in relation to the land and properties, for example:
 - a. outstanding mortgages on each parcel of land and property;
 - b. outstanding property taxes and other potential claims from municipalities;

Mrs. Amy Barsha Washington
April 7, 2023
Page 2

- c. outstanding strata fees;
 - d. utilities (i.e., City, FortisBC, BC Hydro, if applicable);
 - e. GST or other federal taxes (if applicable); and
 - f. provincial taxes (i.e., BC Speculation Tax if applicable);
5. The status of the BC Speculation Tax declarations and copies of the declaration if completed;
 6. For lands and properties located in Vancouver, B.C., the status of the Empty Homes Tax declarations and copies of the declaration if completed; and
 7. Copies of any active listing agreements. The Receiver understands that the listed properties at the date of receivership were listed with Danny Deng (LDG Realty) or Sydney Deng (Royal Pacific Realty Corp.).

The Receiver requests this information be provided as soon as possible.

Additionally, the Receiver requests to meet with you on April 10 or 11, 2023 to review the status of the Washington Properties and to discuss the receivership process. Please advise as to your availability for such a meeting in person or on Teams.

Should you have any questions, please do not hesitate to contact the Receiver's representative at nvirmani@alvarezandmarsal.com or (604) 639-0850, or Anthony Tillman at atillman@alvarezandmarsal.com or (604) 639-0849.

Yours very truly,

ALVAREZ & MARSAL CANADA INC.
in its capacity as Receiver of the Washington Properties
and not in its personal capacity




Per: Anthony Tillman
Senior Vice President

Cc: Jessie Hung, Washington Properties Ltd.
Neil Kornfeld, Kornfeld LLP


Enclosure



This is Exhibit " B " referred to in the af-
fidavit of Anthony Tillman
sworn before me at Vancouver
this 20 day of April 2023


A Commissioner for taking Affidavits
for British Columbia

From: Schultz, Jordan <jordan.schultz@dentons.com>
Sent: April-11-23 11:20 AM
To: Tillman, Anthony <atillman@alvarezandmarsal.com>; Law, Pinky <pinky.law@alvarezandmarsal.com>
Subject: FW: Washington Properties

 [EXTERNAL EMAIL]: Use Caution

FYI, heard back from Neil, so I will try to connect with him today as well.



Jordan Schultz
 Partner

My pronouns are: He/Him/His

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D +1 604 691 6452 | M +1 778 238 8339
 jordan.schultz@dentons.com
 Bio | Website

Dentons Canada LLP
 20th Floor, 250 Howe Street Vancouver, BC V6C 3R8 Canada

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From: Neil Kornfeld <nkornfeld@kornfeldllp.com>
Sent: Saturday, April 8, 2023 3:00 PM
To: Schultz, Jordan <jordan.schultz@dentons.com>
Subject: RE: Washington Properties

[WARNING: EXTERNAL SENDER]

Hi Jordan – last week was a bit busy – we should talk about your requests for info when you have a chance. If you're working this weekend, you can call me on my cell at 604 644 4344, otherwise, Tuesday. Thanks. Neil

E. Neil Kornfeld K.C.*
 Kornfeld LLP
 *Law Corporation
 d:604.331.8301 | f:604.683.0570

From: Schultz, Jordan <jordan.schultz@dentons.com>

Sent: April 3, 2023 10:43 AM

To: Neil Kornfeld <nkornfeld@kornfeldllp.com>

Subject: RE: Washington Properties

EXTERNAL EMAIL

Hi Neil,

I believe you were out of the office last week so just wanted to follow up on the below, is your client able to assist in providing any of this?

Regards,
 Jordan



Jordan Schultz
 Partner

My pronouns are: He/Him/His

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From: Schultz, Jordan <jordan.schultz@dentons.com>

Sent: Monday, March 27, 2023 4:30 PM

To: nkornfeld@kornfeldllp.com

Cc: pinky.law@alvarezandmarsal.com; atillman@alvarezandmarsal.com

Subject: Washington Properties

Hi Neil,

The receivership order in the above matter was stayed until April 7, 2023. I understand the petitioners do not intend to consent to any further extension of that stay, and that the receivership will resume once the current stay expires. In anticipation of that, there is some information related to the Properties that are subject to the receivership order that I am hoping your clients could assist with collecting:

- Proof of insurance for all locations;
- For leased units, please provide copies of the rental agreement, contact information of the tenants and statuses of rent payments (e.g. any in arrears);
- List of bank accounts related to the land and properties under the receivership, if applicable (e.g. dedicated rent collection accounts);
 - Please provide copies of the latest bank statements for these accounts;
- Any outstanding debts (copies of statements) in relation to the land and properties, e.g.
 - Outstanding mortgages on each of the property;
 - Property taxes and other potential claims from the municipalities;
 - Strata fees;
 - Utilities (city, FortisBC, BC Hydro);
 - GST or other federal taxes (if applicable);
 - Provincial taxes e.g. BC Speculation Tax payable (if applicable)
- Please advise the statuses of the BC Speculation Tax declarations, and provide copies of the declaration if completed;
- For the Vancouver properties, please advise the statuses of the Empty Homes Tax declarations, and provide copies of the declaration if completed;
- Copies of any active listing agreements;
 - Based on our understanding, the listed properties as of the receivership date were either listed with Danny Deng (LDG Realty) or Sydney Deng (Royal Pacific Realty Corp.).

Please let me know if so, and/or if you or your clients have any questions regarding next steps with this matter.

Thanks,
Jordan



Jordan Schultz
Partner

My pronouns are: He/Him/His

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