



This is the 1st affidavit
of Channie Yoon in this case
and was made on February 27, 2026

No. H-251466
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

DOMAIN MORTGAGE CORP., as mortgage administrator and bare trustee
for Capstone Mortgage Pool and
Capstone Mortgage Opportunities Fund LP

PETITIONER

AND:

1119356 B.C. LTD.
CENTRA LIMITED PARTNERSHIP
1138624 B.C. LTD.
1877725 ALBERTA LTD.
ZAFIR RASHID
HARPREET (HARIS) THIARA
SATPREET THIARA
FRANCISCO IGNACIO
TRISURA GUARANTEE INSURANCE COMPANY
JB SOLUTIONS ULC
1299881 BC LTD.
TANDEM MECHANICAL SYSTEMS LTD.
METRO-CAN CONSTRUCTION (OT) LTD.
B&B EXCAVATION AND SHORING LTD.
RPMC INVESTMENT INC.
541823 B.C. LTD.
ALL TENTANTS AND/OR OCCUPIERS OF THE
SUBJECT LANDS AND PREMISES

RESPONDENTS

AFFIDAVIT

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

I, Channie Yoon, of 3200 – 650 West Georgia Street, in the City of Vancouver, Province of British Columbia, AFFIRM THAT:

- I. I am a legal administrative assistant with Harper Grey LLP, solicitors for the Respondent, Metro-Can Construction (OT) Ltd., herein, and as such I have personal knowledge of the

matters and facts herein deposed to save and except where the same are stated to be made upon information and belief and as to the latter I verily believe them to be true.

2. Attached to this my Affidavit and marked as **Exhibit "A"** is a true copy of the Order Made After Application of Justice Hoffman dated January 13, 2026 in Action No. S-258214

3. Attached to this my Affidavit and marked as **Exhibit "B"** is a true copy of the Order Made After Application of Justice Kirchner dated February 3, 2026 in Action No. S-258214

AFFIRMED BEFORE ME at Vancouver,
in British Columbia, on 27 February 2026.



A Commissioner for taking affidavits within
British Columbia

Nicola K. Virk
Barrister & Solicitor

Harper Grey LLP

(Print name on affix stamp of Commissioner)

3200 Vancouver Centre
650 West Georgia Street
Vancouver, BC V6B 4P7



CHANNIE YOON



No. S-258214
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

METRO-CAN CONSTRUCTION (OT) LTD.

APPLICANT

AND:

1138624 B.C. LTD. & 1119356 B.C. LTD.

RESPONDENTS

This is Exhibit "A" referred to in the affidavit of CHANNIE YOON affirmed before me at VANCOUVER, BC this 27 day of FEBRUARY, 2026. *Mu*
A Commissioner for taking Affidavits within British Columbia

ORDER MADE AFTER APPLICATION

FORM 35 (RULES 8-4(1), 13-1(3) AND 17-1(2))
[AM BC REG. 58/2012, SCH. A, S. 3]

JUSTICE HOFFMAN

BEFORE

)
) Associate Judge Muir)
) January 13, 2026)

THE HEARING of the Application of the petitioner, Metro-Can Construction (OT) Ltd., coming on for hearing at 800 Smithe Street, Vancouver, BC on January 13, 2026, and on hearing Anand Soma, counsel for the petitioner, and no one else appearing, although duly served; AND UPON READING the materials filed herein;

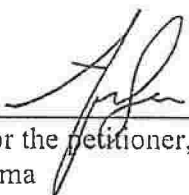
THIS COURT ORDERS that:

1. The Respondents authorize the Petitioner as co-signatory on the Holdback Account within 5 days of the making of this Order, such that no payments can be made from the Holdback Account without the Petitioner's knowledge and consent.
2. The Respondents disclose to the Petitioner within 5 days the particulars of credits to and payments from the Holdback Account funds, including:
 - (a) The date and amount of all credits to and payments from the Holdback Account;
 - (b) The identity of the recipient for all payments from the Holdback Account;
 - (c) The current balance of the Holdback Account;


- (d) Bank statements for the Holdback Account from the date the Holdback Account was established to the present date;
- (e) The date and amount of all credits to and payments from any other account of the Respondents, including but not limited to the Respondents' operating account, which received payments from the Holdback Account for the period in which funds were first transferred from the Holdback Account to such account to the present date;
- (f) The identity of the recipient for all payments from any other account of the Respondents, including but not limited to the Respondents' operating account, which received payments from the Holdback Account for the period in which funds were first transferred from the Holdback Account to such account to the present date;
- (g) The current balance of any other account of the Respondents, including but not limited to the Respondents' operating account, which received payments from the Holdback Account;
- (h) Bank Statements for any other account of the Respondents, including but not limited to the Respondents' operating account, which received payments from the Holdback Account, for the period in which funds were first transferred from the Holdback Account to such account to the present date;
- (i) The Respondents' general ledger from the date the Holdback Account was first established and the present date.

3. ~~Costs against any party that opposes this application.~~

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT.



 Lawyer for the petitioner,
 Anand Soma

By the Court.


 Registrar

Digitally signed by Naidu, Sanjeev



No. S-258214
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

METRO-CAN CONSTRUCTION
(OT) LTD.

APPLICANT

AND:

1138624 B.C. LTD. &
1119356 B.C. LTD.

RESPONDENTS

ORDER MADE AFTER APPLICATION

HARPER GREY LLP
Barristers & Solicitors
3200 - 650 West Georgia Street
Vancouver, BC V6B 4P7
Telephone: (604) 687-0411

Attention: Anand Soma/164890



No. S-258214
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

METRO-CAN CONSTRUCTION (OT) LTD.

APPLICANT

AND:

1138624 B.C. LTD. & 1119356 B.C. LTD.

RESPONDENTS

This is Exhibit " B " referred to in the affidavit of CHANNIE YOON affirmed before me at VANCOUVER, BC this 27 day of FEBRUARY, 20 26
MLi
A Commissioner for taking Affidavits within British Columbia

ORDER MADE AFTER APPLICATION

FORM 35 (RULES 8-4(1), 13-1(3) AND 17-1(2))
[AM BC REG. 58/2012, SCH. A, S. 3]

BEFORE

) THE HONOURABLE JUSTICE Kirchner)
) February 3, 2026)

THE HEARING of the Application of the Applicant, Metro-Can Construction (OT) Ltd., coming on for hearing at 800 Smithe Street, Vancouver, BC on February 3, 2026, and on hearing Anand Soma, counsel for the Applicant, and no one else appearing, although duly served; AND UPON READING the materials filed herein;

THIS COURT ORDERS that:


1. That the Respondent corporations are in breach of the Order of Justice Hoffman filed January 13, 2026;
2. That pursuant to Rule 22-8(2) of the Supreme Court Civil Rules, the Respondent corporations have wilfully disobeyed an order against the Respondents, and are in Contempt of Court;
3. That the Respondents must comply with the Order of Justice Hoffman filed January 13, 2026 within 14 days of this order being made;
4. If the Respondents fail to comply with the Order of Justice Hoffman within 14 days, the Applicants are granted leave to apply to the court for sanctions against the Respondents ~~and their directors~~ pursuant to Rule 22-8(a) and (c) of the Supreme Court Civil Rules, including imposition of fines on the Respondent corporations ~~and its directors~~ *MLC*

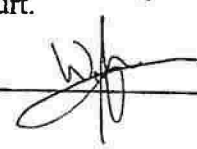
- 5. That pursuant to Rule 14-1(1)(b)(ii) and (3), the Applicant be awarded Special Costs for this application against the Respondent corporations.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT.



 Lawyer for the Applicant,
 Anand Soma


 By the Court.



 Registrar

FORM
 CHECKED
