



This is the 1<sup>st</sup> Affidavit  
of Shun Li Tian in this case  
and was made on April 18, 2023

No. H220369  
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

PLW INVESTMENT LTD.

PETITIONER

AND:

1025332 B.C. LTD., 1026334 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., PRARDA 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), LINDA  
WASHINGTON, 35 PARK PARKING INC. and  
EARLSTON MORTGAGE CORP

RESPONDENTS

**AFFIDAVIT**

I, Shun Li Tian, retired businessperson, of West Vancouver, B.C., SWEAR THAT:

1. I make this affidavit in response to the 1<sup>st</sup> Affidavit of the Respondent Amy Barsha Washington made in these proceedings on April 10, 2023 (the "**Washington Affidavit**"). I 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 do not speak or read English. Peter Pu read to me both the Washington Affidavit and the 4<sup>th</sup> Affidavit of Peter Pu made in these proceedings on April 17, 2023 (the "**Pu Affidavit**").

3. Unless otherwise defined, capitalized terms used herein have the meanings ascribed to them in the Washington Affidavit.

4. I am related to Peter Pu, the President of the Petitioner, PLW Investment Ltd. (“**PLW**”), by marriage—he is the son-in-law of my sister. I also know Ms. Washington and her husband, Edison Washington. They were introduced to me by a mutual friend in or around 2014. It was through me that they were introduced to Mr. Pu.

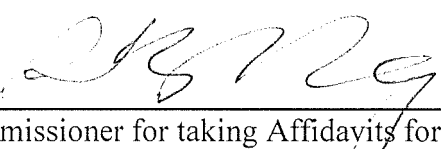
5. With regard generally to the Washington Affidavit and the Pu Affidavit, I confirm that the facts set out in paragraphs 7 to 9 of the Pu Affidavit are correct.

6. Specifically, I confirm that:

- (a) I am not a principal of PLW, and I have no authority to act on behalf of PLW. To my knowledge, only Mr. Pu has such authority.
- (b) I have known the Washingtons longer than Mr. Pu and I know them better. For that reason, the Washingtons would in most instances communicate with me regarding any loans from PLW, and I would relay to Mr. Pu what had been discussed, including any requests the Washingtons might have made. Mr. Pu would make any decisions regarding the loans, and, in many instances, I would relay those decisions back to the Washingtons. I never told either of the Washingtons that I had any authority to speak for or act on behalf of PLW.
- (c) At the May 2020 Loan Meeting, the Washingtons never mentioned the sales of SLs 60 and 163 and never advised me of the GST Arrears (as defined in the Pu Affidavit).
- (d) I never promised the Washingtons that PLW would discharge its mortgages of SLs 60 and 163 without being paid the proceeds of sales of those units. I don’t even have the authority to make any such promise on behalf of PLW.
- (e) I have never asked Amy Washington to assign herself into bankruptcy. I only ever advised her of PLW’s concerns regarding the GST Arrears, which needed to be resolved in order for sales of certain of the Lands to complete. It was in fact Ms. Washington who told me some time ago that her lawyer advised her to assign herself into bankruptcy as this was the only way for her to resolve her financial problems. I neither encouraged Ms. Washington to assign herself into bankruptcy nor discouraged her from doing so; I only ever suggested

that she take whatever steps she could to resolve the GST Arrears issue and have her lawyer communicate her plan to PLW's lawyers.

SWORN BEFORE ME at the City of Vancouver in )  
the Province of British Columbia this 18<sup>th</sup> day of )  
April, 2023. )  
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A Commissioner for taking Affidavits for British )  
Columbia )

REBECCA BARCLAY NGUINAMBAYE  
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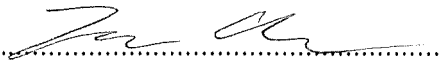
  
SHUN LI TIAN

ENDORSEMENT OF INTERPRETER

I, Yu Chen, interpreter, of 302-999 Gilford street, Vancouver, BC  
certify that:

1. I have a knowledge of the English and Mandarin languages and I am competent to interpret from one to the other.
2. I am advised by the deponent and verily believe that the deponent understands the Mandarin language.
3. Before the affidavit on which this endorsement appears was made by the deponent I correctly interpreted it for the deponent from the English language into the Mandarin language and the deponent appeared to fully understand the contents.

Dated: April 18, 2023

  
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Interpreter