



Affidavit #1 of Vicki Chan
Sworn: June 5, 2025

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 Jao 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

AFFIDAVIT

I, **VICKI CHAN**, of 902 – 925 West Georgia Street, Vancouver, British Columbia, MAKE OATH AND SAY AS FOLLOWS:

1. I am a Vice President of Alvarez & Marsal Canada Inc., in its capacity as court-appointed receiver ("**A&M**" or the "**Receiver**") of Kuang Wan Fang, also known as Wendy Wan Fang Kuang, also known as Wan Fang Kuang, and as such I have personal knowledge of the facts and matters hereinafter deposed to save and except where the same are stated to be made upon information and belief and where so stated I verily believe them to be true.

2. Capitalized terms not otherwise defined herein have the meanings ascribed to them in the Receiver's Report (as defined below).

3. I have had primary carriage of this matter on behalf of A&M and I am authorized to make this affidavit on behalf of A&M.

Receiver's Invoices and Fees

4. Attached collectively and marked as **Exhibit "A"** are copies of the following invoices (collectively, the "**Receiver's Invoices**") issued by A&M showing fees for services rendered and disbursements incurred in this matter. The Receiver's Invoices have been redacted where appropriate to preserve solicitor-client privilege in this ongoing matter:

INVOICE #	DATE	FEES \$	DISBURSEMENTS \$	GST \$	TOTAL \$
1	May 4, 2023	\$24,162.00	\$645.25	\$1,240.36	\$26,047.61
2	August 10, 2023	\$10,644.50	\$1,410.46	\$565.45	\$12,620.41
3	September 8, 2023	\$17,862.00	\$2,863.00	\$924.35	\$21,649.35
4	September 28, 2023	\$9,753.00	\$97.19	\$492.51	\$10,342.70
5	November 24, 2023	\$2,857.00	\$771.47	\$144.12	\$3,772.59
6	January 4, 2024	\$1,599.50	\$118.92	\$85.92	\$1,804.34
7	July 18, 2024	\$3,223.50	\$47.06	\$163.53	\$3,434.09
8	January 15, 2025	\$3,188.00	\$470.94	\$182.95	\$3,841.89
TOTALS:		\$73,289.50	\$6,424.29	\$3,799.19	\$83,512.98

5. As detailed in the Receiver's Invoices, for the period from October 21, 2022 until December 31, 2024, A&M invoiced fees amounting to \$73,289.50 and incurred and invoiced disbursements in the amount of \$6,424.29 and taxes in the amount of \$3,799.19 for a total of \$83,512.98 (the "**Receiver's Fees**").

6. The Receiver's Fees as set out in the Receiver's Invoices are calculated on the basis of the hours spent by the Receiver's personnel, multiplied by the applicable standard hourly rates charged by A&M in its insolvency practice.

7. Several professionals at A&M expended time on this matter. The following is a summary of the name, position, hourly rate, hours, and total fees of each professional on the Receiver's Invoices, and the average hourly rate.

Name	Position	Hourly Rate (*)	Hours	Total Fees
Anthony Tillman	Senior Vice President	\$ 840	16.70	14,028.00
Vicki Chan	Vice President	625 - 665	80.40	53,450.00
Pinky Law	Vice President	665	3.90	2,593.50
Ryan Wu	Associate	445	3.20	1,424.00
Monica Cheung	Executive Assistant	195	9.20	1,794.00
			<u>113.40</u>	<u>73,289.50</u>
Average hourly rate			<u>\$ 646.29</u>	
Total fees				73,289.50

(*) Hourly rates reflect professional rate annual increases effective January 1

8. To the best of my knowledge, information and belief, the information contained in the Receiver's Invoices is true and accurate in all respects as to:

- (a) the numbers of hours worked;
- (b) the nature of work performed;
- (c) the identity of the individuals who performed the work; and
- (d) the rates charged for the work performed.

9. I have reviewed the Receiver's Invoices and verily believe that:

- (a) the Receiver's professional fees and disbursements have been properly incurred and are fair and reasonable in the circumstances;
- (b) the receiver's fees in this matter are consistent with fees charged by other insolvency firms of a similar size for work of a similar nature and complexity in British Columbia; and
- (c) the services were provided by the Receiver in a prudent and economical manner.

The Receiver's Reports

10. The detail of the work carried out by the Receiver in these proceedings, and for which the Court's approval is sought at this time, are set out in the Receiver's first report dated September 1, 2023, and the Receiver's second report dated June 5, 2025 (collectively, the "Receiver's Reports") prepared and filed by the Receiver in these proceedings.

11. I have reviewed the Receiver's Reports and confirm that, to the best of my knowledge, the work detailed therein was carried out by the Receiver, and that such work was necessary to the Receiver in carrying out its duties and obligations in relation to this matter pursuant to the Receivership Order.

Gowling WLG Invoices

12. The Receiver engaged Gowling WLG (Canada) LLP ("**Gowling**") to assist it in carrying out the Receiver's duties and obligations in these proceedings. I have reviewed the invoices of Gowling that were issued from March 5, 2021 to June 30, 2024. I am satisfied that the work detailed therein was completed by Gowling at the request of the Receiver, the work was necessary, and the fees incurred are fair and reasonable in the circumstances.

13. I make this affidavit solely for the purpose of the Receiver's application to, among other things, approve the fees and disbursements in the Receiver's Invoices and the Gowling invoices, and for not other purpose. Nothing herein is intended to be a waiver of solicitor-client privilege by the Receiver.

SWORN BEFORE ME at Vancouver, BC,
on the 5th day of June, 2025.



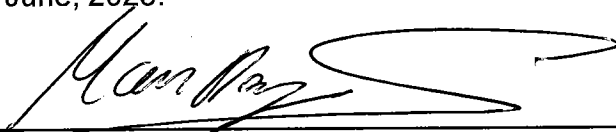
A Commissioner for taking Affidavits for
British Columbia.



VICKI CHAN

MANUEL DOMINGUEZ
GOWLING WLG (CANADA) LLP
BARRISTER & SOLICITOR
550 BURNARD STREET - SUITE 2300
BENTALL 5 - VANCOUVER, B.C. V6C 2B5
TELEPHONE: (604) 891-2772

This is Exhibit "A" referred to in the Affidavit of **VICKI CHAN**, sworn before me at Vancouver, BC, this 5th day of June, 2025.

A handwritten signature in black ink, appearing to read 'Alan Day', written over a horizontal line.

A Commissioner for taking Affidavits in British Columbia



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Alvarez & Marsal Canada Inc.
Licensed Insolvency Trustees
Cathedral Place Building
925 West Georgia Street, Suite 902
Vancouver, BC V6C 3L2
Phone: +1 604 638 7440
Fax: +1 604 638 7441

May 4, 2023

Bank of China
c/o Alvarez & Marsal Canada Inc.
902-925 West Georgia Street
Vancouver, BC V6C 3L2

Re: Kuang Wan Fang

For professional services rendered for the period Oct 21, 2022 – April 30, 2023 in connection with the appointment of Alvarez & Marsal Canada Inc. as Receiver of the assets, undertakings and property of Ms. Kuang Wan Fang in Canada (the “Receiver”).

<u>A&M Personnel</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
A. Tillman, Senior Vice President	3.5	\$840	\$2,940.00
V. Chan, Vice President	28.0	665(*)	18,604.00
P. Law, Vice President	2.5	665	1,662.50
M. Cheung, Executive Assistant	4.9	195	955.50
	38.9		24,162.00
Add: out of pocket expense			
Advertisement			519.60
Courier			125.65
			645.25
			24,807.25
Add: GST (5%)			1,240.36
TOTAL INVOICE			<u>\$26,047.61</u>

(*) Rate adjusted effective January 1, 2023.

Mailing Instructions:

Alvarez & Marsal Canada ULC
Attn: Monica Cheung
Cathedral Place
925 West Georgia Street, Suite 902
Vancouver, B.C. V6C 3L2

Wire Instructions:

Bank: TD Canada Trust
Account Name: Alvarez & Marsal Canada ULC
Swiftcode: TDOMCATTTOR
Bank Address: 55 King Street West
Toronto, ON M5K 1A2
Bank Transit #: 10202
Institution #: 0004
Account #: 5519970
Reference #: **842025 – Inv#1**
GST: 83486 3367 RT0001
Please send details of your remittance to treasury@alvarezandmarsal.com

<u><i>Anthony Tillman</i></u>	<u><i>Description</i></u>	<u><i>Hrs.</i></u>
Mar 3	Attend to initial receivership matters; Attend site;	1.5
Mar 6	Attend update call with Gowlings; Internal meeting re: strategy;	0.7
Mar 9	Attend to site plans; Internal discussion re: same;	0.4
Mar 10	Internal planning meeting;	0.5
Mar 20	Internal status meeting.	0.4
TOTAL – A. Tillman		3.5 hrs.



<u>Vicki Chan</u>	<u>Description</u>	<u>Hrs.</u>
Oct 26	Call with J. Bradshaw re: engagement matters;	0.2
Oct 27	Attend to general administrative matters and engagement set up;	0.2
Feb 28	Call with J. Bradshaw re: court hearing and Receivership matters; internal discussions and correspondence with J. Ross of same; follow-up on retainer; review application response and filed affidavits;	1.3
Mar 2	Call with J. Ross re: receivership matters; review draft application materials;	0.5
Mar 3	Review court materials and prepare for Receivership proceedings; attend property and prepare update to DLA and Gowlings; internal discussions; call with J. Ross, Gowlings re: Receivership proceedings;	3.5
Mar 6	Call with J. Ross re: path forward; internal discussions; attend to insurance matters and complete form to broker;	1.0
Mar 8	Prepare letter re: lock change; call with J. Ross regarding BC Residential Tenancy Act; internal discussions; attend to insurance matters; attend to general administrative matters;	2.0
Mar 9	Prepare log of correspondence and site visits to Property; coordinate bailiff and possession of property; prepare notice letters to occupants; internal discussions; attend to insurance matters; prepare PPSA ad;	3.5
Mar 10	Prepare log of correspondence and site visits to Property; call and correspondence with occupant's family and coordinate site visit for following week; internal discussions; attend to insurance matters; provide update to Bank's counsel; finalize PPSA ad;	2.0
Mar 14	Attend to newspaper notice;	0.2
Mar 15	Attend to insurance policy terms;	0.3
Mar 16	Follow-up on insurance policy coverage; correspondence with occupant's family re: site visit;	0.3
Mar 17	Travel to and from site and meet with occupant to discuss property-related matters; update site visit log; attend to general administrative matters; follow-up on insurance policy; review comments received from potential realtor;	3.5
Mar 20	Prepare correspondence to City of Richmond re: property taxes;	0.3

Mar 21	Prepare update to DLA Piper; review correspondence and tax notice from City; correspondence with realtors to coordinate proposals and appraisals; review Gowlings' invoice; attend to general administrative matters;	1.5
Mar 22	Correspondence with realtors to coordinate site visits and proposals; coordinate property appraisal;	0.5
Mar 23	Correspondence with occupant regarding property taxes; consider applicability of vacancy tax on property;	0.5
Mar 28	Call with J. Bradshaw re: property update and consideration of agreement with occupant;	0.3
Mar 30	Correspondence with occupant, appraiser, and real estate brokers for upcoming site visit;	0.5
Mar 31	Travel to and from property; attend property with appraisers and real estate brokers; review preliminary proposal received from realtor;	3.5
Apr 10	Correspondence with occupants re key handover;	0.3
Apr 19	Coordinate key and remote handover;	0.2
Apr 20	Review realtor proposals and internal discussions; call with realtor; call with J. Bradshaw to provide update of property and proposed marketing path forward and prepare update email of same;	1.3
Apr 28	Call with J. Bradshaw re: path forward and appraisal; follow-up with appraiser regarding occupancy factor; correspondence with realtor re: marketing and clean-up of property; follow-up on insurance matters.	0.6
TOTAL – V. Chan		28.0 hrs.



<u><i>Pinky Law</i></u>	<u><i>Description</i></u>	<u><i>Hrs.</i></u>
Mar 17	Attend on site for site visit; call with realtor re: marketing proposal;	1.5
Apr 20	Attend on site to take over keys of the property.	1.0
TOTAL – P. Law		2.5 Hrs.



<u>Monica Cheung</u>	<u>Description</u>	<u>Hrs.</u>
Mar 6	Inquire into obtaining insurance for property;	0.3
Mar 9	Arrange for Court Bailiff to change locks; Inquire into security for property; Mail letter to occupant; Arrange for home insurance; Internal discussions regarding same; Attend to notice matters;	1.8
Mar 10	Attend to notice matters; Follow up with Aon re insurance;	0.3
Mar 14	Follow up with Aon re insurance;	0.1
Mar 15	Follow up with Aon re insurance;	0.2
Mar 16	Follow up with Aon re insurance;	0.3
Mar 20	Prepare and email letter to the City of Richmond re property taxes; Attend to insurance matters;	0.4
Mar 22	Inquire appraisal estimates and arrange for appointment;	0.5
Apr 17	Prepare summary of proposals from realtors;	0.7
Apr 25	Follow up with AON re insurance;	0.1
Apr 28	Follow up with AON re insurance.	0.2
TOTAL –M. Cheung		4.9 hrs.





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Licensed Insolvency Trustees
Cathedral Place Building
925 West Georgia Street, Suite 902
Vancouver, BC V6C 3L2
Phone: +1 604 638 7440
Fax: +1 604 638 7441

August 10, 2023

Bank of China
c/o Alvarez & Marsal Canada Inc.
902-925 West Georgia Street
Vancouver, BC V6C 3L2

Re: Kuang Wan Fang

For professional services rendered for the period May 1 – July 31, 2023 in connection with the appointment of Alvarez & Marsal Canada Inc. as Receiver of the assets, undertakings and property of Ms. Kuang Wan Fang in Canada (the "Receiver").

<u>A&M Personnel</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
A. Tillman, Senior Vice President	1.8	\$840	\$1,512.00
V. Chan, Vice President	13.0	665	8,645.00
M. Cheung, Executive Assistant	2.5	195	487.50
	<u>17.3</u>		<u>10,644.50</u>

Add: out of pocket expense

Insurance	746.00*
Appraisal	625.00
Personal mileage	36.60
Advertisement	2.86
	<u>1,410.46</u>

12,054.96

Add: GST (5%)

565.45

TOTAL INVOICE

\$12,620.41

(*) GST Exempt

Mailing Instructions:

Alvarez & Marsal Canada ULC
Attn: Monica Cheung
Cathedral Place
925 West Georgia Street, Suite 902
Vancouver, B.C. V6C 3L2

Wire Instructions:

Bank: TD Canada Trust
Account Name: Alvarez & Marsal Canada ULC
Swiftcode: TDOMCATTOR
Bank Address: 55 King Street West
Toronto, ON M5K 1A2

Bank Transit #: 10202
Institution #: 0004
Account #: 5519970
Reference #: 842025 – Inv#2
GST: 83486 3367 RT0001

Please send details of your remittance to treasury@alvarezandmarsal.com

<u><i>Anthony Tillman</i></u>	<u><i>Description</i></u>	<u><i>Hrs.</i></u>
May 24	Attend to property sale matters;	0.5
July 10	Internal update meeting;	0.3
July 14	Internal discussion re: listing and estate funding;	0.3
July 19	Internal update meeting re: Bank of China;	0.3
July 24	Call with DLA; Internal call re: listing;	0.4
TOTAL – A. Tillman		1.8 hrs.



<u>Vicki Chan</u>	<u>Description</u>	<u>Hrs.</u>
May 1	Consider approach to ready property for listing and correspondence with realtor of same; attend to appraised values; notify unsuccessful realtor;	0.4
May 4	Prepare addendum for MLS and correspondence with J. Ross of same; attend to insurance matters;	1.0
May 9	Follow-up with J. Ross re MLS addendum; follow-up and provide servicing quotes to J. Bradshaw; follow-up on insurance matters;	0.5
May 10	Calls with J. Ross re MLS addendum and Schedule A for purchase contract form; call with J. Bradshaw re Bank's requests and other related matters; obtain quotes for additional valuation reports; correspondence with realtor re service providers and addendum;	0.8
May 15	Call with realtor; follow-up with BC Hydro re: account;	0.5
May 16	Correspondence with J. Bradshaw re: timing for Bank's review; correspondence with and review updates from realtor; respond to follow-up questions by appraiser;	1.0
May 18	Review Multiple Listing Contract and related documents; correspondence with realtor re: MLC and lock change; review Schedule A to Purchase and Sale Contract;	1.0
May 24	Attend to MLS agreement; call with realtor re: agreements and property matters; follow-up on appraisal;	0.7
May 25	Correspondence with realtor re: MLS, fintrac matters, and property matters;	0.5
May 26	Review and execute MLS agreement; correspondence with J. Ross of same; internal discussions; coordinate appraisal; call with J. Bradshaw re property matters and listing;	1.0
May 29	Call with appraiser re timing and valuation method; provide update to DLA Piper; correspondence with realtor re listing date;	0.5
May 30	Review appraisal report and discussions with appraiser;	0.7
May 31	Review revised appraisal report and correspondence with DLA Piper re: listing; correspondence with former occupant;	0.3
Jun 1	Call with realtor re: listing logistics; discussion with DLA Piper re: updated appraisal;	0.4
Jun 21	Review payables re: insurance; prepare ITN application draft;	0.5
Jun 23	Review updated tax folios from city;	0.2



Jun 27	Send ITN application draft to DLA Piper; request updated tax folio from City of Richmond; provide update to realtor;	0.8
Jun 28	Prepare for marketing procedure; internal discussions;	0.2
Jun 29	Internal discussions to prepare for marketing procedure;	0.3
Jul 4	Follow-up with DLA Piper on status;	0.2
Jul 10	Call with J. Bradshaw re: status update;	0.2
Jul 14	Follow-up with J. Bradshaw, DLA; review update from realtor;	0.3
Jul 19	Follow-up with J. Bradshaw; internal discussions;	0.2
Jul 20	Consider retaining property security; internal discussions;	0.3
Jul 24	Call with J. Bradshaw; consider security costs; correspondence with realtor and attend to property costs.	0.5
TOTAL – V. Chan		13.0 Hrs.



<u>Monica Cheung</u>	<u>Description</u>	<u>Hrs.</u>
May 9	Email with AON re insurance;	0.1
May 10	Arrange for second appraisal;	0.3
May 15	Email and telephone correspondence with BC Hydro to set up power;	1.0
May 17	Arrange for second appraisal;	0.1
Jun 23	Email to the City of Richmond to obtain updated property tax;	0.2
Jul 20	Inquire with security companies for Udy road;	0.2
Jul 21	Inquire with security companies for Udy road;	0.2
Jul 24	Inquire with security companies for Udy road;	0.3
Jul 26	Inquire with security companies for Udy road.	0.1
TOTAL –M. Cheung		2.5 hrs.





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 Licensed Insolvency Trustees
 Cathedral Place Building
 925 West Georgia Street, Suite 902
 Vancouver, BC V6C 3L2
 Phone: +1 604 638 7440
 Fax: +1 604 638 7441

September 8, 2023

Bank of China
 c/o Alvarez & Marsal Canada Inc.
 902-925 West Georgia Street
 Vancouver, BC V6C 3L2

Re: Kuang Wan Fang

For professional services rendered for the period August 1 - 31, 2023 in connection with the appointment of Alvarez & Marsal Canada Inc. as Receiver of the assets, undertakings and property of Ms. Kuang Wan Fang in Canada (the "Receiver").

<u>A&M Personnel</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
A. Tillman, Senior Vice President	4.5	\$840	\$3,780.00
V. Chan, Vice President	21.0	665	13,965.00
M. Cheung, Executive Assistant	0.6	195	117.00
	<u>26.1</u>		<u>17,862.00</u>

Add: out of pocket expense

Insurance (3 months)

Appraisal

2,238.00*

625.00

2,863.00

20,725.00

Add: GST (5%)

924.35

TOTAL INVOICE

\$21,649.35

(*) GST Exempt

Mailing Instructions:

Alvarez & Marsal Canada ULC
 Attn: Monica Cheung
 Cathedral Place
 925 West Georgia Street, Suite 902
 Vancouver, B.C. V6C 3L2

Wire Instructions:

Bank: TD Canada Trust
 Account Name: Alvarez & Marsal Canada ULC
 Swiftcode: TDOMCATTOR
 Bank Address: 55 King Street West
 Toronto, ON M5K 1A2
 Bank Transit #: 10202
 Institution #: 0004
 Account #: 5519970
 Reference #: **842025 – Inv#3**
 GST: 83486 3367 RT0001

Please send details of your remittance to treasury@alvarezandmarsal.com

<u>Anthony Tillman</u>	<u>Description</u>	<u>Hrs.</u>
Aug 1	Attend to finalization of listing agreement;	0.5
Aug 3	Review offer; Internal discussion re: same;	0.6
Aug 8	Call with realtor re: offers to date;	0.3
Aug 9	Review offers; Call with realtor re: same;	0.9
Aug 11	Attend to house sale matters;	0.4
Aug 29	Review draft Court materials and report; Draft comments re: same; Internal discussions.	1.8
TOTAL – A. Tillman		4.5 hrs.



<u>Vicki Chan</u>	<u>Description</u>	<u>Hrs.</u>
Aug 1	Prepare property listing and call with realtor of same;	0.3
Aug 3	Review received offer; call with realtor; internal discussions; execute additional listing documents; call with J. Bradshaw to provide update and timing expectations;	1.2
Aug 9	Review offers and call with realtor of same; correspondence with J. Ross re: [REDACTED] provide update to Bank's counsel;	1.5
Aug 10	Review updated property tax statements; attend to sale matters; consider non-resident tax implications;	0.5
Aug 11	Call with J. Ross re: [REDACTED]; calls with realtor to discuss offer's terms and conditions; execute counteroffer to potential buyer; attend to file-related payables; attend to property tax matters; correspondence with J. Bradshaw re: withholding taxes;	2.5
Aug 14	Call with J. Bradshaw: property sale update and tax matters; call with realtor re: deposit; review case law re: tax withholdings and refund; attend to sale matters;	2.0
Aug 15	Review 1074022 B.C. Ltd. V. Li reasons for judgment; prepare for and attend call with J. Bradshaw and J. Ross to discuss tax approach; correspondence with realtor;	2.0
Aug 16	Respond to inquiries from Bank of China re: tax matters; correspondence with J. Ross; consider tax implications;	0.5
Aug 17	Prepare draft of Receiver's First Report, including consideration of tax matters and sale and vesting order; attend to general sale matters; call with realtor re: marketing report;	3.5
Aug 18	Prepare draft of Receiver's First Report; review disbursements paid to date; consider court order provisions;	1.5
Aug 21	Prepare draft Receiver's First Report; review realtor's marketing report; call with J. Ross re: [REDACTED]; correspondence with J. Bradshaw re: tax accountant fees;	1.0
Aug 25	Call with J. Ross re: [REDACTED]; review draft report;	0.4
Aug 28	Review draft motion materials; revise draft Receiver's report; correspondence with A. Tillman and J. Ross re: [REDACTED]; attend to sale matters;	1.5

Aug 29	Review updated court order; revise draft Receiver's report; internal discussions; call with J. Ross re: [REDACTED] [REDACTED]	2.3
Aug 31	Review revised court materials and report;	0.3
TOTAL – V. Chan		21.0 Hrs.



<u>Monica Cheung</u>	<u>Description</u>	<u>Hrs.</u>
Aug 11	Call with Prov Govt re Vacancy Tax statement; Email re same;	0.3
Aug 18	Prepare summary of expenses.	0.3
TOTAL –M. Cheung		0.6 hrs.





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 Licensed Insolvency Trustees
 Cathedral Place Building
 925 West Georgia Street, Suite 902
 Vancouver, BC V6C 3L2
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 Fax: +1 604 638 7441

September 28, 2023

Bank of China
 c/o Alvarez & Marsal Canada Inc.
 902-925 West Georgia Street
 Vancouver, BC V6C 3L2

Re: Kuang Wan Fang

For professional services rendered for the period September 1-28, 2023 in connection with the appointment of Alvarez & Marsal Canada Inc. as Receiver of the assets, undertakings and property of Ms. Kuang Wan Fang in Canada (the "Receiver").

<u>A&M Personnel</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
A. Tillman, Senior Vice President	2.4	\$840	\$2,016.00
V. Chan, Vice President	11.4	665	7,581.00
M. Cheung, Executive Assistant	0.8	195	156.00
	<u>14.6</u>		<u>9,753.00</u>
Add: out of pocket expense			
BC Hydro			<u>97.19</u>
			9,850.19
Add: GST (5%)			<u>492.51</u>
TOTAL INVOICE			<u>\$10,342.70</u>

(*) GST Exempt

Mailing Instructions:

Alvarez & Marsal Canada ULC
 Attn: Monica Cheung
 Cathedral Place
 925 West Georgia Street, Suite 902
 Vancouver, B.C. V6C 3L2

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 Reference #: 842025 – Inv#3
 GST: 83486 3367 RT0001
 Please send details of your remittance to treasury@alvarezandmarsal.com

<u>Anthony Tillman</u>	<u>Description</u>	<u>Hrs.</u>
Sep 6	Internal discussions re: Court order;	0.5
Sep 8	Internal discussions re: Court hearing and closing matters; Review updated Court order;	0.8
Sep 11	Review sale closing update;	0.4
Sep 25	Review closing documents; Internal discussion re: same.	0.7
TOTAL – A. Tillman		2.4 hrs.



<u>Vicki Chan</u>	<u>Description</u>	<u>Hrs.</u>
Sep 1	Review and finalize Receiver's Report; call with realtor re: court hearing;	0.5
Sep 5	Prepare for court hearing and sealed bid process; call with J. Ross and email with realtor of same;	0.8
Sep 6	Review proposed order terms; call with J. Ross and J. Bradshaw re: draft court order; internal discussions; call with realtor re: court hearing and related matters;	2.8
Sep 7	Call and correspondence with realtor re: closing matters, application materials, and purchaser's legal representative information; call with J. Ross re: [REDACTED]; consider tax matters and implications;	1.0
Sep 8	Prepare for and attend court to obtain sale approval and vesting order; discussions with legal counsels and realtor; call with J. Ross re: [REDACTED]; follow-up with realtor re: closing matters; review and execute contract addendum re: closing date;	3.0
Sep 21	Review draft closing documents; call with J. Ross; attend to cancellation of service providers i.e. insurance and utilities;	1.0
Sep 22	Attend to closing matters; correspondence with J. Ross; review disbursements from realtor;	1.0
Sep 25	Execute closing documents and attend to related matters; call with J. Ross re: payments upon closing;	0.5
Sep 27	Attend to closing matters and execute directions to pay;	0.3
Sep 28	Call with J. Ross re: fundings and other closing matters;	0.5
TOTAL – V. Chan		11.4 Hrs.



<u>Monica Cheung</u>	<u>Description</u>	<u>Hrs.</u>
Sep 13	Attend to utility matters;	0.3
Sep 18	Attend to cancellation of BC hydro account;	0.1
Sep 20	Attend to insurance invoices;	0.2
Sep 28	Email with AON re outstanding invoices.	0.2
TOTAL –M. Cheung		0.8 hrs.





Alvarez & Marsal Canada Inc.
 Licensed Insolvency Trustees
 Cathedral Place Building
 925 West Georgia Street, Suite 902
 Vancouver, BC V6C 3L2
 Phone: +1 604 638 7440
 Fax: +1 604 638 7441

November 24, 2023

Bank of China
 c/o Alvarez & Marsal Canada Inc.
 902-925 West Georgia Street
 Vancouver, BC V6C 3L2

Re: Kuang Wan Fang

For professional services rendered for the period October 1-31, 2023 in connection with the appointment of Alvarez & Marsal Canada Inc. as Receiver of the assets, undertakings and property of Ms. Kuang Wan Fang in Canada (the "Receiver").

<u>A&M Personnel</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
A. Tillman, Senior Vice President	0.3	\$840	\$252.00
V. Chan, Vice President	3.8	665	2,527.00
M. Cheung, Executive Assistant	0.4	195	78.00
	<u>4.5</u>		<u>2,857.00</u>

Add: out of pocket expense

Insurance	746.00*
BC Hydro	25.47
	<u>771.47</u>

3,628.47

Add: GST (5%)

144.12

TOTAL INVOICE

\$3,772.59

(*) GST Exempt

Mailing Instructions:

Alvarez & Marsal Canada ULC
 Attn: Monica Cheung
 Cathedral Place
 925 West Georgia Street, Suite 902
 Vancouver, B.C. V6C 3L2

Wire Instructions:

Bank: TD Canada Trust
 Account Name: Alvarez & Marsal Canada ULC
 Swiftcode: TDOMCATTOR
 Bank Address: 55 King Street West
 Toronto, ON M5K 1A2
 Bank Transit #: 10202
 Institution #: 0004
 Account #: 5519970
 Reference #: 842025 – Inv#5
 GST: 83486 3367 RT0001
 Please send details of your remittance to treasury@alvarezandmarsal.com

<u>Anthony Tillman</u>	<u>Description</u>	<u>Hrs.</u>
Oct 16	Internal discussion re: distribution.	0.3
TOTAL – A. Tillman		0.3 hrs.



<u>Vicki Chan</u>	<u>Description</u>	<u>Hrs.</u>
Oct 4	Attend to payables;	0.2
Oct 13	Call with J. Ross re: next steps; review ITN application and support; attend to R&D matters;	0.5
Oct 16	Review ITN application materials prepared by debtor; updated interim R&D statement;	0.7
Oct 17	Prepare interim R&D statement and reconciliation and share with DLA Piper;	1.0
Oct 20	Call with J. Ross re: [REDACTED]; call with DLA Piper and Gowlings re: [REDACTED]	1.0
Oct 26	Review follow-up letter to Purchaser's counsel re: certificate of compliance and correspondence with J. Ross of same; review invoices for payment.	0.4
TOTAL – V. Chan		3.8 Hrs.



<u>Monica Cheung</u>	<u>Description</u>	<u>Hrs.</u>
Oct 5	Prepare wire payment;	0.2
Oct 13	Update and reconcile R&D.	0.2
TOTAL –M. Cheung		0.4 hrs.





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 925 West Georgia Street, Suite 902
 Vancouver, BC V6C 3L2
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 Fax: +1 604 638 7441

January 4, 2024

Bank of China
 c/o Alvarez & Marsal Canada Inc.
 902-925 West Georgia Street
 Vancouver, BC V6C 3L2

Re: Kuang Wan Fang

For professional services rendered for the period November 1 – December 31, 2023 in connection with the appointment of Alvarez & Marsal Canada Inc. as Receiver of the assets, undertakings and property of Ms. Kuang Wan Fang in Canada (the "Receiver").

<u>A&M Personnel</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
A. Tillman, Senior Vice President	0.4	840	\$336.00
V. Chan, Vice President	1.9	665	1,263.50
	2.3		1,599.50
Add: out of pocket expenses			
Utilities			118.92
			1,718.42
Add: GST (5%)			85.92
TOTAL INVOICE			<u>\$1,804.34</u>

Mailing Instructions:

Alvarez & Marsal Canada ULC
 Attn: Monica Cheung
 Cathedral Place
 925 West Georgia Street, Suite 902
 Vancouver, B.C. V6C 3L2

Wire Instructions:

Bank: TD Canada Trust
 Account Name: Alvarez & Marsal Canada ULC
 Swiftcode: TDOMCATTOR
 Bank Address: 55 King Street West
 Toronto, ON M5K 1A2
 Bank Transit #: 10202
 Institution #: 0004
 Account #: 5519970
 Reference #: 842025 – Inv#6
 GST: 83486 3367 RT0001
 Please send details of your remittance to treasury@alvarezandmarsal.com

<u>Anthony Tillman</u>	<u>Description</u>	<u>Hrs.</u>
Dec 18	Internal update meeting re: CRA and creditor counsel response.	0.4
TOTAL – A. Tillman		0.4 Hrs.



<u><i>Vicki Chan</i></u>	<u><i>Description</i></u>	<u><i>Hrs.</i></u>
Nov 27	Review payables; update R&D.	0.3
Dec 18	Call with J. Ross re: next steps; internal discussions;	0.3
Dec 19	Follow-up with J. Bradshaw re: original copies for ITN application and notarized identification; call with J. Ross;	0.3
Dec 22	Prepare drafts of tax filings (s. 116, T1261, T2062, AUT-01), transmittal letters and enclosures.	1.0
TOTAL – V. Chan		1.9 Hrs.





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July 18, 2024

Bank of China
 c/o Alvarez & Marsal Canada Inc.
 902-925 West Georgia Street
 Vancouver, BC V6C 3L2

Re: Kuang Wan Fang

For professional services rendered for the period January 1 – June 30, 2024 in connection with the appointment of Alvarez & Marsal Canada Inc. as Receiver of the assets, undertakings and property of Ms. Kuang Wan Fang in Canada (the "Receiver").

<u>A&M Personnel</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
A. Tillman, Senior Vice President	1.7	840	\$1,428.00
V. Chan, Vice President	1.3	665	864.50
P. Law, Vice President	1.4	665	931.00
	<u>4.4</u>		<u>3,223.50</u>
Add: out of pocket expenses			
Courier			47.06
			<u>3,270.56</u>
Add: GST (5%)			163.53
TOTAL INVOICE			<u>\$3,434.09</u>

Mailing Instructions:

Alvarez & Marsal Canada ULC
 Attn: Monica Cheung
 Cathedral Place
 925 West Georgia Street, Suite 902
 Vancouver, B.C. V6C 3L2

Wire Instructions:

Bank: TD Canada Trust
 Account Name: Alvarez & Marsal Canada ULC
 Swiftcode: TDOMCATTOR
 Bank Address: 55 King Street West
 Toronto, ON M5K 1A2
 Bank Transit #: 10202
 Institution #: 0004
 Account #: 5519970
 Reference #: 842025 – Inv#7
 GST: 83486 3367 RT0001
 Please send details of your remittance to treasury@alvarezandmarsal.com

<u><i>Anthony Tillman</i></u>	<u><i>Description</i></u>	<u><i>Hrs.</i></u>
Jan 5	Review draft ITIN application; Sign enclosure to CRA;	0.4
June 5	Respond to Bank of China inquiries;	0.4
June 12	Attend update call to consider CRA options with DLA and Gowlings;	0.6
June 13	Internal meeting re: CRA.	0.3
TOTAL – A. Tillman		1.7 Hrs.



<u><i>Vicki Chan</i></u>	<u><i>Description</i></u>	<u><i>Hrs.</i></u>
Jan 2	Prepared information for potential S116 and T2062 submission and correspondence with J. Ross and J. Bradshaw of same;	1.0
Jan 5	Prepare ITIN application.	0.3
TOTAL – V. Chan		1.3 Hrs.



<u><i>Pinky Law</i></u>	<u><i>Description</i></u>	<u><i>Hrs.</i></u>
Jun 12	Attend call with DLA, Gowlings re: next steps.	0.5
Jun 13	Review file; arrange website set up; emails with Gowlings re: SAVO court application; research on CRA clearance certificate; internal discussions.	0.8
Jun 14	Review website posting.	0.2
TOTAL – P. Law		1.4 Hrs.





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January 15, 2025

Bank of China
 c/o Alvarez & Marsal Canada Inc.
 902-925 West Georgia Street
 Vancouver, BC V6C 3L2

Re: Kuang Wan Fang

For professional services rendered for the period July 1 – December 31, 2024 in connection with the appointment of Alvarez & Marsal Canada Inc. as Receiver of the assets, undertakings and property of Ms. Kuang Wan Fang in Canada (the “Receiver”).

<u>A&M Personnel</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
A. Tillman, Senior Vice President	2.1	\$840	\$1,764.00
R. Wu, Associate	3.2	445	1,424.00
	5.3		3,188.00
Add: out of pocket expenses			
Website maintenance			375.00
Land Title searches			95.94
			470.94
			3,658.94
Add: GST (5%)			182.95
			3,841.89
TOTAL INVOICE			<u>\$3,841.89</u>

Mailing Instructions:

Alvarez & Marsal Canada ULC
 Attn: Monica Cheung
 Cathedral Place
 925 West Georgia Street, Suite 902
 Vancouver, B.C. V6C 3L2

Wire Instructions:

Bank: TD Canada Trust
 Account Name: Alvarez & Marsal Canada ULC
 Swiftcode: TDOMCATTOR
 Bank Address: 55 King Street West
 Toronto, ON M5K 1A2
 Bank Transit #: 10202
 Institution #: 0004
 Account #: 5519970
 Reference #: 842025 – Inv#8
 GST: 83486 3367 RT0001
 Please send details of your remittance to treasury@alvarezandmarsal.com

<u>Anthony Tillman</u>	<u>Description</u>	<u>Hrs.</u>
Aug 7	Call with CRA re: file status;	0.3
Oct 29	Call with DLA re: next file steps; Review file status;	0.4
Nov 13	Internal meeting re: return filing;	0.3
Nov 14	Attend meeting with Lancaster re: return;	0.5
Nov 25	Internal discussion re: return and supporting information;	0.3
Dec 2	Attend to submission to Lancaster.	0.3
TOTAL – A. Tillman		2.1 Hrs.



<u>Ryan Wu</u>	<u>Description</u>	<u>Hrs.</u>
Nov 12	Review sale documents, ITN and other documents in preparation for tax return; internal discussions regarding foreign tax return;	0.5
Nov 24	Draft appendices for foreign tax return cover letter, calculate amount to remit under Section 116(3), draft T2062 package;	1.0
Nov 25	Draft appendices for foreign tax return cover letter, calculate adjusted cost base for the sale, calculate amount to remit under Section 116(3), draft T2062 package;	1.2
Dec 2	Draft package to D. Lancaster for foreign tax filing;	0.2
Dec 11	Email correspondence with L. Powell regarding foreign tax return; review internal documents and compile data request.	0.3
TOTAL – R. Wu		3.2 hrs.



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; and Others

DEFENDANTS/ JUDGMENT DEBTORS

AFFIDAVIT

GOWLING WLG (CANADA) LLP
Barristers and Solicitors
Suite 2300, 550 Burrard Street
Vancouver, BC V6C 2B5

Tel. No. 604.683.6498
Fax No. 604.683.3558

File No. V53261

MD/msh