



No. H220369
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN

PLW INVESTMENT LTD.

PETITIONER

AND

**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., 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

**FIFTH REPORT OF THE RECEIVER
ALVAREZ & MARSAL CANADA INC.**

October 20, 2023



ALVAREZ & MARSAL

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1.0 INTRODUCTION

- 1.1 On October 27, 2022 (the “**Receivership Date**”), upon the application of PLW Investment Ltd. (“**PLW**” or the “**Petitioner**”), Alvarez & Marsal Canada Inc. (“**A&M**”) was appointed as receiver and manager (the “**Receiver**”), pursuant to an order (as subsequently amended on November 7, 2022, the “**Receivership Order**”) granted by the Honourable Justice Giaschi in the Supreme Court of British Columbia (the “**Court**”), in respect of certain lands and other assets, undertakings and property of 1025332 B.C. Ltd. (“**5332**”), 1025334 B.C. Ltd. (“**5334**”), 1025336 B.C. Ltd. (“**5336**”), Chongye Developments Ltd. (“**Chongye**”), Washington Properties (Point Grey) Inc. (“**Properties (PG)**”), Washington Properties (QEP) Inc. (“**Properties (QEP)**”), Lucky Five Investments Ltd. (“**Lucky Five**”), 1094321 B.C. Ltd. (“**321**”), Prarda Developments Corporation (“**Prarda**”), 1256306 B.C. Ltd. (“**125**”), 1256319 B.C. Ltd. (“**319**”), Amy Barsha Washington (a.k.a. Fengyun Shao) (“**A. Washington**”), Edison Washington (a.k.a. Qiang Wang) (“**E. Washington**”), and Linda Washington (“**L. Washington**”) (collectively, the “**Debtors**” or the “**Washington Group**”). This matter is hereinafter referred to more generally as, the “**Receivership Proceedings**”.
- 1.2 On November 7, 2022, this Honourable Court granted an order to stay the Receivership Order to December 7, 2022, which stay has been extended by subsequent orders of this Court and most recently to April 7, 2023. The Receiver’s appointment resumed on April 8, 2023 (the “**Resumption Date**”).
- 1.3 At the Resumption Date, there were 21 lots and properties of the Debtors (the “**Washington Properties**”) that were subject to these Receivership Proceedings, which are located in or around Vancouver and West Vancouver, British Columbia (“**B.C.**”).
- 1.4 On April 26, 2023, on the application of the Petitioner, this Honourable Court granted a stay against the Receivership Order in respect of two Washington Properties with the legal addresses (i) Strata Lot 60, Block 839, Plan EPS4950, District Lot 526, Group 1, New Westminster Land District, and (ii) Strata Lot 163, Block 839, Plan EPS4950, District Lot 526, Group 1, New Westminster Land District (collectively, the “**Stayed Properties**”).
- 1.5 On April 28, 2023, this Honourable Court approved the sale of one of the Washington Properties located at 835 Eyremount Drive, West Vancouver, B.C., (“**835 Eyremount**”) which completed on May 25, 2023.
- 1.6 On June 21, 2023, on the application of the Receiver (the “**June 21 Application**”), this Honourable Court granted an order (the “**June 21 Order**”) approving the sale of one of the Washington Properties located at 605-5033 Cambie Street, Vancouver, B.C. (“**605-5033**”) which was completed on July 6,

2023. The June 21 Application also sought expansion of the Receivership Order to add Strata Lot 70 of the Public Harbour of Burrard Inlet NWD Strata Plan LMS3057, with civic address 1203-535 Nicola Street, Vancouver, B.C. ("**SL 70**"), to these Receivership Proceedings. This matter was adjourned at the June 21, 2023 hearing.

- 1.7 On July 13, 2023, on the application of the Receiver, this Honourable Court pronounced an order authorizing the Receiver to pay the arrears of strata fees and related costs to the owners of Strata Plan EPS4950 in connection with the 11 Washington Properties located in the three-tower development at 4963 Cambie Street, 5033 Cambie Street and 5077 Cambie Street, Vancouver B.C. (the "**Cambie Strata Lots**").
- 1.8 On July 20, 2023, on application of the Receiver, this Honourable Court approved the sale of three Washington Properties located at 4883 Belmont Avenue, 4889 Belmont Avenue and 4899 Belmont Avenue, Vancouver, B.C. (the "**Belmont Properties**") which completed on August 31, 2023.
- 1.9 On September 8, 2023, on the application of the Receiver, this Honourable Court pronounced an order approving the sale of two of the Washington Properties located at 505-5033 Cambie Street ("**505-5033**") and 504-4963 Cambie Street, Vancouver, B.C. ("**504-4963**") (the "**505-5033 and 504-4963 Order**").
- 1.10 On October 17, 2023, the Receiver filed a notice of application, returnable on October 30, 2023, and Affidavit #4 of Avic Arenas sworn on October 17, 2023 (the "**Fourth Arenas Affidavit**"), with this Honourable Court seeking an order to approve the sale of 504-5033 Cambie Street ("**504-5033**").
- 1.11 On October 18, 2023, the Receiver filed a notice of application, returnable on October 30, 2023, seeking an order to approve (i) the unsealing of the Confidential Supplement to the Third Report of the Receiver dated July 4, 2023 which includes appraisal evidence for the Belmont Properties; and (ii) the removal of Strata Lot 69 (PID: 024-010-499) of the Public Harbour of Burrard Inlet NWD Strata Plan LMS3057 (the "**Nicola Strata Lot**" or "**SL 69**") from these Receivership Proceedings.
- 1.12 On October 20, 2023, the Receiver filed a notice of application, returnable October 30, 2023, seeking an order to approve the distribution of proceeds from the sale of the Applicable Lands (subsequently defined) to secured creditors in priority to the Canada Revenue Agency ("**CRA**").
- 1.13 As of the date of this fifth report (the "**Fifth Report**"), there are currently 13 Washington Properties that remain subject to these Receivership Proceedings, which include three residential detached homes and 10 strata lots (including 504-4963 with sale scheduled to close by December 27, 2023).

- 1.14 The Receivership Order along with select application materials and other documents filed in the Receivership Proceedings are available for review by interested parties and posted on the Receiver's website at www.alvarezandmarsal.com/washingtonproperties.

2.0 PURPOSE OF THE FIFTH REPORT

- 2.1 This Fifth Report has been prepared to provide this Honourable Court with information regarding the following:

- a) the proposed sale of 504-5033;
- b) potential GST liabilities in respect of Properties (QEP) and A. Washington; and
- c) the current status of the Nicola Strata Lot.

3.0 SALE OF 504-5033

Receiver's Powers

- 3.1 Pursuant to section 2 of the Receivership Order, the Receiver is authorized to, among other things:

2... (k) market any or all of the Property, including advertising and soliciting offers in respect of the Property or any part or parts thereof and negotiating such terms and conditions of sale as the Receiver considers appropriate;

(l) sell, convey, transfer, lease or assign the Property or any part or parts thereof out of the ordinary course of business:

- i. without the approval of this Court in respect of a single transaction for consideration up to \$50,000 provided that the aggregate consideration for all such transactions does not exceed \$250,000; and*
- ii. with the approval of this Court in respect of any transaction in which the individual or aggregate purchase price exceeds the limits set out in subparagraph (i) above, and in each such case notice under Section 59(10) of the Personal Property Security Act, R.S.B.C. 1996, c. 359 shall not be required;*

(m) apply for any vesting order or other orders necessary to convey the Property or any part or parts thereof to a purchaser or purchasers, free and clear of any liens or encumbrances;

Marketing of the Property

- 3.2 504-5033 is a 1,462 square foot, 3-bedroom sub-penthouse strata lot located near a major transit corridor and within the immediate vicinity of a local city attraction, Queen Elizabeth Park.

- 3.3 On July 4, 2023, the Receiver engaged Oakwyn Realty Ltd. (“**Oakwyn**” or the “**Listing Agent**”) through a multiple listing services (“**MLS**”) contract to market for sale certain of the Cambie Strata Lots in phases, including 504-5033 (the “**Listing Agreement**”).
- 3.4 504-5033 was listed on September 11, 2023, for \$1,588,800 for an eight-week term expiring on November 10, 2023.
- 3.5 Oakwyn’s marketing efforts for 504-5033 included organizing professional photographs and staging for the unit, posting the listing on MLS and distributing a four-page feature sheet to prospective buyers. Oakwyn also conducted targeted outreach to potential buyers and their agents that had shown interest in the Cambie Strata Lots prior to 504-5033’s listing.
- 3.6 The Listing Agent’s efforts resulted in 10 private appointments, as well as phone calls from interested parties requesting additional information. Oakwyn’s marketing report for 504-5033 is attached to the Fourth Arenas Affidavit.

Accepted Offer

- 3.7 On September 14, 2023, Bong Ling Lui and Agnes Yuen Yan Au (the “**504-5033 Purchasers**”), represented by the brokerage Royal Pacific Realty Corp. (“**Pacific Realty**”), presented an offer for 504-5033 in the amount of \$1.658 million (the “**Accepted Offer**”).
- 3.8 The key terms of the Accepted Offer include, among other things, (i) a closing date of November 15, 2023, should the sale order be granted by this Honourable Court; (ii) the property is sold on an “as is – where is” basis; and (iii) the sale is subject to Court approval.
- 3.9 Pursuant to the applicable Listing Agreement, the Receiver has agreed to pay a total commission equal to 7% of the first \$100,000 of gross sale proceeds, and 2.5% of the balance. Accordingly, in respect of the Accepted Offer, the total commission amount would be \$45,950, of which the Listing Agent would receive \$24,583 and the brokerage of the 504-5033 Purchasers would receive \$21,367.

Receiver’s Comments on the Sale of 504-5033

- 3.10 Upon expiry of the stay of the Receivership Order on April 7, 2023, the Receiver had exclusive conduct of the sale of 504-5033 and is supportive of the sale for the following reasons:
- a) the Accepted Offer of \$1.658 million is the highest and best offer to date and exceeds the list price by \$70,000;
 - b) the Accepted Offer has a near-term closing date that is on November 15, 2023, should the sale be approved by this Honourable Court;

- c) a deposit in the amount of \$82,900 was received on September 23, 2023, and is being held in a trust account with Pacific Realty;
 - d) the sale transaction will allow the Receiver to avoid incurring additional holding costs in respect of 504-5033, including preservation costs, statutory obligations (including property taxes and other taxes) and professional fees;
 - e) the purchase price of \$1.658 million for 504-5033 is consistent with market value and is commercially reasonable; and
 - f) the secured creditor, PLW, and legal owner of 504-5033 are supportive of the sale.
- 3.11 It is the Receiver's view that 504-5033 was marketed in a manner that was fair and reasonable and the property has been exposed to the market for a considerable amount of time. Given the current state of the real estate market and rising interest rates, the Receiver views the transaction to be in the best interest of the creditors.

4.0 BELMONT PROPERTIES – CITY OF VANCOUVER AUDIT

- 4.1 As noted above, the sale of the Belmont Properties closed on August 31, 2023. The Receiver was made aware of an ongoing audit of the 2021 Empty Homes and Vacancy Tax (the “**2021 EHT Audit**”) by the City of Vancouver (“**COV**”) in relation to the Belmont Properties in August 2023. The 2021 EHT Audit was subsequently concluded by the COV where it determined that the Debtors were not liable for any Empty Homes and Vacancy Tax for 2021.
- 4.2 Immediately after the conclusion of the 2021 EHT Audit, the COV commenced the Empty Homes and Vacancy Tax audit on the Belmont Properties for 2022 (the “**2022 EHT Audit**”). The COV advised the Receiver's legal counsel, Dentons Canada LLP (“**Dentons**”), that the estate's maximum exposure from the 2022 EHT Audit is approximately \$1.8 million.
- 4.3 As a result of the potential exposure from 2022 EHT Audit, the Receiver instructed Dentons to withhold \$1.8 million from the distribution of the proceeds from the sale of the Belmont Properties to the Petitioner when Dentons made the distribution from the Belmont Properties sale to the Petitioner in September 2023 (in the amount of approximately \$34.0 million).
- 4.4 Upon discussion with PLW and its legal counsel, Fasken Martineau DuMoulin LLP (“**Fasken**”), the Receiver has agreed to remit the \$1.8 million of withheld funds to Fasken, on its undertaking to return such funds on demand if the COV concludes, following the 2022 EHT Audit, that all or part of the Empty Homes and Vacancy Tax for that year is owing and the Receiver is liable for such amount.

5.0 POTENTIAL GST LIABILITIES

Overview

- 5.1 Prior to September 2020, certain of the Washington Properties were financed by separate loans (the “**Original Loans**”) advanced from the lenders, Kingsett Mortgage Corporation and Laurentian Bank of Canada. The Original Loans were secured, in part, by various mortgages registered against the Cambie Strata Lots. For clarity, the ownership structure and status of all the Washington Properties that are (and were) included in these Receivership Proceedings are tabled below:

Property	Legal Owner	Beneficial Owner	Status
Belmont Properties	5332, 5334, 5336	Properties (PG)	Sold in these Receivership Proceedings
Cambie Strata Lots (<i>Note 1</i>)	A. Washington	Properties (QEP)	Certain of the Cambie Strata Lots have been sold in these Receivership Proceedings
4215 Cambie Street, Vancouver, B.C. (“ 4215 Cambie ”) (<i>Note 1</i>)	E. Washington	Washington Properties (West 27th) Inc.	Listed for sale in these Receivership Proceedings
4491 Cambie Street, Vancouver, B.C. (“ 4491 Cambie ”) (<i>Note 1, Note 2</i>)	A. Washington	Washington Properties (West 29th) Inc.	Listed for sale in these Receivership Proceedings
835 Eyremount (<i>Note 1, Note 2</i>)	A. Washington	n/a	Sold in these Receivership Proceedings
4408 West 3rd Avenue, Vancouver, B.C. (“ 4408 West 3rd ”) (<i>Note 2</i>)	A. Washington	Chongye	Listed for sale in these Receivership Proceedings
Nicola Strata Lot	L. Washington	n/a	Not listed for sale in these Receivership Proceedings
<p><i>Notes:</i></p> <p>(1) The Cambie Strata Lots, 4215 Cambie, 4491 Cambie and 835 Eyremount are herein collectively referred to as the “Applicable Lands”.</p> <p>(2) 4491 Cambie, 835 Eyremount and 4408 West 3rd are herein collectively referred to as the “Amy Properties”.</p>			

- 5.2 On or around September 4, 2020, Properties (QEP) and certain Debtors entered into a refinancing transaction by which certain of the Debtors were advanced amounts from PLW, secured by mortgages, through a 2020 Loan Agreement (defined in the table below). Additionally, PLW had advanced funds to certain of the Debtors in a 2018 and 2019 loan agreement, which are also presented in the table below for completeness:

Loan Agreement	Borrowers	Amount	Particulars of Security
Loan agreement dated December 18, 2018 (the "2018 Loan Agreement")	A. Washignton, 5332, 5334, 5336, Chongye, and Properties (PG)	Advances up to \$24,800,000	Secured by a mortgage over the Belmont Properties and 835 Eyremount
Loan agreement dated July 26, 2019 (the "2019 Loan Agreement")	A. Washignton, 5332, 5334, 5336, Properties (PG), Properties (QEP), Lucky Five, 321 and Prarda	Advances up to \$8,000,000	Secured, in part, by various mortgages: (a) the "2019 Belmont Mortgage"; (b) the "2019 West 35 Mortgage" and the "2019 Strata Mortgage"; (c) the "Nicola Mortgage"; and (d) mortgages over various lands not subject to these Receivership Proceedings
Loan agreement dated August 17, 2020, which superceded and replaced the 2019 Loan Agreement (the "2020 Loan Agreement")	A. Washignton, E. Washington, 5332, 5334, 5336, Chongye, Properties (PG), Properties (QEP), Lucky Five, 321 and Prarda	Advances up to \$50,000,000	Secured, in part, by various mortgages registered against each of the Applicable Lands. In respect of the Cambie Strata Lots, the mortgages registered included: (a) the "Laurentian Mortgage" registered August 30, 2018; (b) the "Kingsett Mortgage" registered August 30, 2018; (c) the "Second Kingsett Mortgage" registered October 2, 2019; and (d) the "2019 Strata Mortgage" registered May 22, 2020 (as modified September 3, 2020). In respect of the remaining Applicable Lands, the mortgages registered included: (a) the "2020 Eyremount Mortgage" which was a fourth-ranking charge with respect to 835 Eyremount; and (b) the "2020 Group B Mortgage" which was a first-ranking charge with respect to 4215 Cambie and 4491 Cambie. In respect of 4408 West 3rd, the "2021 West 3rd Mortgage" was registered.

- 5.3 Advances under the 2020 Loan Agreement were also used to fund the assignment of certain of the Original Loans and related security to PLW as well as pay certain outstanding strata fees, property taxes and transaction costs associated with the transfer of the legal title and beneficial ownership of the Cambie Strata Lots to two numbered companies: 1256306 B.C. Ltd. ("125") as legal owner and 1256319 B.C. Ltd. ("319") as beneficial owner (collectively, the "Numbered Companies"). The Numbered Companies are entities affiliated with or controlled by PLW.
- 5.4 The Receiver is not aware of A. Washington or Properties (QEP) holding any funds separate and apart from the property in respect of any potential GST liabilities.
- 5.5 With the exception of the Belmont Properties with directed proceeds to be paid directly to PLW, orders pronounced and approving the sale of properties in these Receivership Proceedings provided that the net sale proceeds be held by the Receiver pending further order of this Honourable Court.

Properties (QEP)

5.6 Properties (QEP) did not have significant assets outside of its interest in the Cambie Strata Lots and ran into financial difficulties by the time the Cambie Strata Lots completed construction and subsequently converted the Cambie Strata Lots into rental properties.

5.7 In or around December, 2019, the CRA assessed Properties (QEP) for collecting, but not remitting, GST, and has since issued subsequent assessments. Properties (QEP) has been assessed GST liability of approximately \$7.5 million (the “GST Assessment”) due to the CRA for the period from December 1, 2019, to June 30, 2022, pursuant to a proof of claim and notice of assessment submitted to the Receiver by the CRA in or around June 2023. The Receiver understands that the liability is made up of the following assessments:

(a)	December 31, 2019	\$1,996,589.86
(b)	December 31, 2020	\$4,883,097.01
(c)	February 28, 2021	\$107,415.41
(d)	March 31, 2021	\$199,620.08
(e)	April 30, 2021	\$99,003.67
(f)	June 30, 2021	\$95,672.88
(g)	June 30, 2022	\$69,005.17

5.8 The Receiver understands that the GST liability does not take priority over PLW in respect of the Cambie Strata Lots for two reasons:

- a) the mortgages were registered prior to the GST Assessment; and
- b) the deemed trust operates as a floating charge.

Mortgages Registered Prior to the GST Assessment

5.9 Subsections 222(4) of the *Excise Tax Act* (the “ETA”) provides that a mortgage over a debtor’s property ranks in priority to the CRA’s deemed trust provided by subsections 222(1) and (3) of the ETA in situations where a lender registers a mortgage on a debtor’s real property before a deemed trust arises.

5.10 The 2020 Loan Agreement is secured, in part, by the following mortgages over the Cambie Strata Lots which were registered prior to the initial GST assessment made on December 31, 2019:

- a) the Laurentian Mortgage registered August 30, 2018;
- b) the First Kingsett Mortgage registered August 30, 2018; and
- c) the Second Kingsett Mortgage registered October 2, 2019.

Deemed Trust Operates as a Floating Charge

- 5.11 The Receiver understands that in prior cases, statutory deemed trusts have been established to operate similar to a “floating charge” security interest, and accordingly, the deemed trust would no longer apply to the Cambie Strata Lots upon the transfer of ownership of the Cambie Strata Lots from A. Washington and Properties (QEP) to the Numbered Companies.
- 5.12 It is the Receiver’s view that in connection with the refinancing in 2020, Properties (QEP) disposed of the Cambie Strata Lots, which were secured by mortgages registered prior to the GST Assessment, when it transferred the Cambie Street Lots to the Numbered Companies. Accordingly, proceeds from the sale of the Cambie Strata Lots in these Receivership Proceedings should be paid to the secured creditors in priority to the CRA.

A. Washington

- 5.13 In addition to interests in the Cambie Strata Lots, A. Washington is (or was) the legal owner of the Amy Properties.
- 5.14 As at the date of this Fifth Report, the Receiver is not aware of any assessments being made against A. Washington for GST liabilities. Accordingly, it is the Receiver’s understanding that any proceeds from the sale of the Amy Properties (excluding 4408 West 3rd) should be paid to the secured creditors in priority to the CRA.

Chongye

- 5.15 The Receiver is aware of a potential GST claim against Chongye, the beneficial owner of 4408 West 3rd; however, the Receiver will not be seeking directions from this Honourable Court at this time given Earlston Mortgage Corp. holds the first-ranking security position over 4408 West 3rd.

PLW’s Security

- 5.16 The Receiver has reviewed an independent security opinion, provided by its counsel, Dentons, confirming that that PLW holds first-ranking, valid and enforceable security over the proceeds held by the Receiver from the sale of the Applicable Lands.

6.0 REMOVAL OF THE NICOLA STRATA LOT FROM RECEIVERSHIP PROCEEDINGS

- 6.1 As described in the second report of the Receiver dated June 14, 2023, the wall between SL 69 and SL 70 was demolished to combine the two strata lots into one unit (hereinafter referred to as “**535 Nicola**”). L. Washington is the registered owner of both SL 69 and SL 70. The Receiver understands that, prior to the commencement of the Receivership Proceedings, the interior of 535 Nicola was fully demolished as the owner was intending to undergo a full renovation at the unit. However, due

to a lack of funding, the renovation did not ultimately proceed. As a result, 535 Nicola is currently uninhabitable.

- 6.2 Pacifica Mortgage Investment Corporation (“**Pacifica**”) and CTJ Investments Inc. (“**CTJ**”) hold first- and second-ranking mortgages, respectively, over both SL 69 and SL 70. The Petitioner holds a third-ranking mortgage over SL 69, but not SL 70. Accordingly, the Receivership Order only granted the Receiver authority over SL 69.
- 6.3 As described in section 1.6 above, the Receiver made an application to this Honourable Court to add SL 70 to these Receivership Proceedings as it appeared practical to market and sell both SL 69 and SL 70 together, but the hearing was ultimately adjourned on June 21, 2023 (the “**Adjournment Date**”). Since the Adjournment Date, the Receiver, in consultation with and through its legal counsel, Dentons, has exchanged correspondence with L. Washington’s legal counsel to discuss alternative paths forward to monetize 535 Nicola and maximize recovery to creditors.
- 6.4 More recently, Pacifica and CTJ had approached the Receiver seeking consent to seek conduct of sale of SL 69 (“**Conduct of Sale**”) outside of these Receivership Proceedings. The Receiver has consented to either Pacifica or CTJ seeking Conduct of Sale and understands that CTJ may be seeking an order from this Honourable Court for the Conduct of Sale in the near term.
- 6.5 Given that (i) the Receiver has possession of only SL 69; (ii) CTJ intends to seek Conduct of Sale from this Honourable Court; and (iii) PLW’s security is subordinate to the mortgages held by Pacifica and CTJ, it is the Receiver’s view, which is supported by the Petitioner, that SL 69 be removed from these Receivership Proceedings to avoid incurring additional holding costs and to maximize recovery to creditors.

7.0 RECEIVER’S CONCLUSION AND RECOMMENDATIONS

- 7.1 Based on the information and reasons set out above, the Receiver respectfully recommends that this Honourable Court approve the following:
- a) the sale of 504-5033;
 - b) the unsealing of the Confidential Supplement to the Third Report of the Receiver dated July 4, 2023;
 - c) the distribution of proceeds from the sale of the Applicable Lands to secured creditors in priority to the CRA; and
 - d) the removal of the Nicola Strata Lot from these Receivership Proceedings.

All of which is respectfully submitted to this Honourable Court this 20th day of October, 2023.

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



Per: Pinky Law
Vice President