



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 TENANTS AND/OR OCCUPIERS OF THE  
SUBJECT LANDS AND PREMISES

RESPONDENTS

**RESPONSE TO PETITION**

**Filed by: Desjardins Financial Security Life Assurance Company ("Desjardins")**

THIS IS A RESPONSE TO the Petition filed December 19, 2025.

Desjardins estimates that the application will take 60 minutes.

**PART 1: ORDERS CONSENTED TO**

Desjardins consents to the granting of the orders set out in paragraph 1(j) of Part 1 of the Petition.

**PART 2: ORDERS OPPOSED**

Desjardins opposes the granting of the orders set out in **NONE** of the paragraphs of Part 1 of the Petition.

**PART 3: ORDERS ON WHICH NO POSITION IS TAKEN**

Desjardins takes no position on the granting of the orders set out in the remaining paragraphs of Part 1 of the Petition.

**PART 4: FACTUAL BASIS**

1. The facts supporting this Response to Petition are more fully set out in the Affidavit of Geneviève Riverin and Susan Danielisz, each sworn February 26, 2026.
2. 1119356 B.C. Ltd. owns the real property legally described as PID: 026-731-134, Parcel A Section 26 Block 5 North Range 2 West New Westminster District Plan BCP24667 (the "Real Property").
3. Desjardins is not a respondent to this proceeding but is an affected party. Desjardins is the first mortgage holder on the Real Property pursuant to a charge on the Real Property under registration no. CA9882427 and a Priority Agreement registered as CB290136 granting it priority over Domain Mortgage Corp.

**PART 5: LEGAL BASIS**


4. Desjardins consents to the granting of the order set out in paragraph 1(j) of Part 1 of the Petition, and takes no position on the granting of the orders set out in the remaining paragraphs of Part 1 of the Petition.

**PART 6: MATERIAL TO BE RELIED ON**

1. Affidavit #1 of Geneviève Riverin made February 26, 2026.

2. Affidavit #1 of Susan Danielisz made February 26, 2026.

DATE: February 26, 2026



Counsel for Desjardins Financial  
Security Life Assurance Company  
McCarthy Tétrault LLP  
(H. Lance Williams and Sanea Tanvir)

**Desjardin's Address for Service is:**

McCarthy Tétrault LLP  
Barristers & Solicitors  
Suite 2400, 745 Thurlow Street  
Vancouver, BC V6E 0C5

**Attention: H. Lance Williams and Sanea Tanvir**

Fax number for service (if any): Nil.

Email address for service (if any):  
lwilliams@mccarthy.ca  
stanvir@mccarthy.ca  
sdanielisz@mccarthy.ca

**Name of Desjardin's lawyer, if any:** (same as above)