



NO. H-250800
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

ROYAL BANK OF CANADA

PETITIONER

AND:

1075 NELSON DEVELOPMENT LIMITED PARTNERSHIP
1075 NELSON DEVELOPMENT GP INC.
1075 NELSON DEVELOPMENT HOLDINGS INC.
BRIVIA FAMILY INVESTMENTS INC.
KHENG LY
1409658 B.C. LTD.
TRAVELERS INSURANCE COMPANY OF CANADA

RESPONDENTS

REQUISITION – GENERAL
STATEMENT OF RELIEF SOUGHT

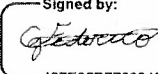
Filed by: Royal Bank of Canada (the “Petitioner”)

Required: The Petitioner seeks the following relief at the hearing of the petition on October 15, 2025:

1. Redemption Period:	Adjourn generally
2. Redemption Amount:	Adjourn generally
3. Interest Rates:	As set out in the form of order nisi attached hereto as “Schedule A” (paragraph 5)
4. Daily Interest as at October 15, 2025:	As set out in the form of order nisi attached hereto as “Schedule A” (paragraph 5)

5. Judgment Against:	1075 Nelson Development Holdings Inc., 1075 Nelson Development GP Inc., 1075 Nelson Development Limited Partnership, Brivia Family Investments Inc., and Kheng Ly.
6. Costs:	Yes. Costs, as against 1075 Nelson Development Holdings Inc., 1075 Nelson Development GP Inc., 1075 Nelson Development Limited Partnership, and Brivia Family Investments Inc., and Kheng Ly on a full indemnity basis. The Petitioner be at liberty to apply for a different scale of costs on further applications.
7. Right to Apply for a Further Accounting:	Yes
8. Order for Sale:	Not at this time
9. Appointment of Receiver:	Granted pursuant to Order made July 25, 2025
10. Other	Declarations as to the amounts secured by the security, which is due and owing by the Respondents, as set out in the form of order nisi attached hereto as "Schedule A" (paragraph 5)

Date: 01/OCT/2025

Signed by:

427E35D7766245C...

Signature of Cassandra Federico,
lawyer for filing party

THIS REQUISITION is filed by the firm of Dentons Canada LLP, Barristers and Solicitors, 20th Floor, 250 Howe Street, Vancouver, British Columbia, V6C 3R8 (Telephone: 604-687-4460) | Email: john.sandrelli@dentons.com & Cassandra.federico@dentons.com | Attention: John Sandrelli and Cassandra Federico

Schedule "A"
Draft Form of Order Nisi

IN THE SUPREME COURT OF BRITISH COLUMBIA

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RESPONDENTS

ORDER MADE AFTER APPLICATION

)	THE HONOURABLE JUSTICE)	
BEFORE)	BLAKE)	15/OCT/2025
))	

ON THE APPLICATION of the Petitioner coming on for hearing at 800 Smithe Street, Vancouver, British Columbia on 15/OCT/2025; and on hearing John Sandrelli and Cassandra Federico counsel for the Petitioner, and other counsel as listed on Schedule "A" hereto; and no one else appearing although duly served;

THIS COURT ORDERS AND DECLARES THAT:

1. The mortgage and assignment of rents dated April 11, 2023 (the "**Legal Mortgage**"), made between the Respondent, 1075 Development Holdings Inc. ("**1075 Holdings**"), as mortgagor, and the Petitioner, as mortgagee, and registered in the New Westminster Land Title Office on May 11, 2023, under registration numbers CB612313

and CB612314 and together with a beneficial mortgage and authorization executed on May 11, 2023, among the Respondent, 1075 Nelson Development Limited Partnership ("**1075 LP**"), as beneficial owner, and 1075 Holdings, as nominee (the "**Beneficial Mortgage**") and together with the Legal Mortgage, the "**Mortgage**") is a valid and enforceable charge on the following lands and premises:

Parcel Identifier: 031-725-953
LOT A BLOCK 7 DISTRICT LOT 185 GROUP 1 NEW WESTMINSTER
DISTRICT PLAN EPP118708

(the "**Lands**").

2. The general security agreement dated May 11, 2023 (the "**GSA**" and together with the Mortgage, the "**Security**"), granted by the Respondents, 1075 Holdings, 1075 LP, and 1075 Nelson Development Holdings GP Inc. ("**1075 GP**", and together with 1075 Holdings and 1075 LP, the "**Debtors**"), to the Petitioner and perfected by registration in the Personal Property Security Registry for the Province of British Columbia on March 27, 2023, under registration no. 437074P, constitutes a valid and enforceable security interest charging all of the present and after-acquired personal property of those Respondents (collectively, the "**Personal Property**").

3. The Security ranks in priority to the interests in the Lands and the Personal Property of the Respondents, and each of them, and their respective heirs, executors, administrators, successors and assigns and all persons claiming by, through or under them.

4. There has been default under the Security.

5. The amount of money secured by the Security and owing to the Petitioner by the Debtors is the sum of \$92,969,843.93 as at October 15, 2025 together with interest thereon at the rate of the prime rate of interest of RBC (currently 4.70%) plus 2.50% per annum being the daily rate this day of \$17,753.42 plus costs of the Petitioner of and in connection with this proceeding.

6. The Debtors, jointly and severally, shall pay to the Petitioner the sum of \$92,969,843.93 together with the Petitioner's assessed costs of this proceeding as against the Debtors.

7. The Respondents, Kheng Ly and Brivia Family Investments Group Inc. (together, the "**Guarantors**"), jointly and severally, shall pay to the Petitioner the sum of \$92,969,843.93 together with the Petitioner's assessed costs of this proceeding as against

the Guarantors pursuant to their guarantee of the indebtedness of the Debtors owing to the Petitioner (the "**Guarantee**").

8. The Petitioner's application for redemption of the Lands forthwith, or in the alternative fixing the final date for redemption, be and is hereby adjourned generally.

9. The Petitioner's application for an order that if the Lands are not redeemed the Petitioner shall be at liberty to apply for an order absolute of foreclosure, be and is hereby adjourned generally.

10. The Petitioner is at liberty to apply to this Court for a further accounting of any amounts that are due to the Petitioner pursuant to the Security, before and after the date of pronouncement of this order.

11. The assessable costs of an in connection with this proceeding are awarded to the Petitioner as special costs on a solicitor and own client basis, pursuant to the terms of the Security and the Guarantee.

12. All other relief claimed in the Petition to the Court herein be and is hereby adjourned generally.

13. The approval as to form of this Order other than counsel for the Petitioner, be dispensed with.

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:

Signature of John Sandrelli
Lawyer for the Petitioner

By the Court.

Registrar

SCHEDULE "A"

Counsel Appearing

Counsel	Party Represented
John Sandrelli Cassandra Federico	<i>The Petitioner, Royal Bank of Canada</i>
Colin Brousson	<i>The Receiver, Deloitte Restructuring Inc.</i>

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ORDER MADE AFTER APPLICATION

DENTONS CANADA LLP
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Attention: John Sandrelli

File No. 506954-834