



Court No. B-230561
Estate No. 11-3014787
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF
ANDERSON SQUARE HOLDINGS LTD.

APPLICATION RESPONSE

Application Response of: Anderson Plaza Holdings Inc., (the “application respondent”)

To: The Service List.

THIS IS A RESPONSE TO the notice of application of Anderson Square Holdings Ltd.
filed on September 23, 2026.

The application respondent estimates that the application will take 2 hours.

Part 1: ORDERS CONSENTED TO

The application respondent consents to the granting of the orders set out in ALL paragraphs
of Part 1 of the notice of application.

Part 2: ORDERS OPPOSED

The application respondent opposes the granting of the orders set out in NONE of the
paragraphs of Part 1 of the notice of application.

Part 3: ORDERS ON WHICH NO POSITION IS TAKEN

The application respondent takes no position on the granting of the orders set out in NONE
of the paragraphs of Part 1 of the notice of application.

Part 4: FACTUAL BASIS

1. The application respondent, Anderson Plaza Holdings Inc. (“**Anderson Plaza**”) is
a related party to the proposal debtor, Anderson Square Holdings Ltd. (the
“**Company**”). The Company is a wholly owned subsidiary of Anderson Plaza.
2. Unless otherwise defined herein, capitalized terms used in this application response
have the same meanings as ascribed to them in the notice of application.
3. Anderson Plaza has a proven unsecured claim of approximately \$46.8 million.

4. The Company has paid or is in the process of repaying all creditors other than Anderson Plaza.
5. Anderson Plaza anticipates that its claim will be paid out from the proceeds from the sale of the remaining unsold units in the Prima Project and the cash the Company currently has on hand.
6. Anderson Plaza would be materially prejudiced by an automatic assignment of the Company into bankruptcy.
7. Anderson Plaza fully supports the Company's application to withdraw the Amended Proposal and the NOI filing.

Part 5: LEGAL BASIS

8. Anderson Plaza adopts and relies upon the legal basis as set out in the notice of application.

Part 6: MATERIAL TO BE RELIED ON

9. Fourth Report to Court of the Proposal Trustee.
10. Such further and other material as counsel may advise and this Honourable Court may permit.
- [X] The application respondent(s) has/have filed in this proceeding a document that contains the application respondent(s)'s address for service.
- [] The application respondent(s) has/have not filed in this proceeding a document that contains an address for service. The application respondent(s)'s ADDRESS FOR SERVICE is:

Date: September 23, 2026

Thomas Hansen
for: 

Signature of Jeremy D. West
Lawyer for application respondent