

This is the 1st affidavit
of A. Arenas in this case
and was made on 31 / MARCH / 2025

NO. S240493
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

FOX ISLAND DEVELOPMENT LTD. and ADVANCED VENTURE HOLDING CO., LTD.

PETITIONERS

AND:

KENSINGTON UNION BAY PROPERTIES NOMINEE LTD. (formerly known as 34083 YUKON INC.), KENSINGTON UNION BAY PROPERTIES LIMITED PARTNERSHIP, KENSINGTON UNION BAY PROPERTIES GP LTD, INTERNATIONAL TRADE CENTER PROPERTIES LTD., SUNWINS ENTERPRISE LTD., MO YEUNG CHING also known as MICHAEL CHING, MO YEUNG PROPERTIES LTD., SFT DIGITAL HOLDINGS 30 LTD., HOTEL VERSANTE LTD., BEEM CREDIT UNION, MORTEQ LENDING CORP., CHUN YU LIU, 1307510 B.C. LTD., JEFFREY RAUCH, and HEUNG KEI SUNG

RESPONDENTS

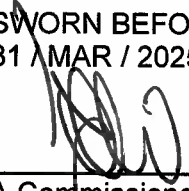
AFFIDAVIT

I, **AVIC ARENAS**, of 250 Howe Street, 20th Floor, Vancouver, BC, Paralegal, SWEAR THAT:

1. I am employed by the law firm of Dentons Canada LLP, solicitors for Deloitte Restructuring Inc., in its capacity as court appointed receiver and manager (the "**Receiver**"), and as such have personal knowledge of the matters herein deposed to, except those facts which I say are based upon information and belief and as to those facts I truly believe them to be true.
2. Now shown to me and marked as **Exhibit "A"** to my affidavit is a true copy of the BC Company Search for Hotel Versante Ltd. dated March 21, 2025.
3. Now shown to me and marked as **Exhibit "B"** to my affidavit is a true copy of the BC Company Search for International Trade Center Properties Ltd. dated March 21, 2025.

4. Now shown to me and marked as **Exhibit "C"** to my affidavit is a true copy of the BC Company Search for RCC Holdings Ltd. dated March 21, 2025.
5. Now shown to me and marked as **Exhibit "D"** to my affidavit is a true copy of the BC Company Search for Club Versante Management Ltd. dated March 13, 2025.
6. Now shown to me and marked as **Exhibit "E"** to my affidavit is a true copy of the BC Company Search for 1036524 B.C. Ltd. dated March 20, 2025.
7. Now shown to me and marked as **Exhibit "F"** to my affidavit is a true copy of the search of the trademark "Versante Hotel" in the Canadian Intellectual Property Office.

SWORN BEFORE ME at Vancouver, BC, on
31 / MAR / 2025.




A Commissioner for taking Affidavits within
British Columbia



AVIC ARENAS

JOHN R. SANDRELLI
Barrister & Solicitor
DENTONS CANADA LLP
20th Floor, 250 Howe Street
Vancouver, B.C. V6C 3R8
Telephone (604) 687-4460

This is **Exhibit "A"** referred to in the affidavit of A.
Arenas sworn before me at Vancouver, BC this 31st
day of March, 2025.



A Commissioner for taking Affidavits
For British Columbia



BC Company Summary

For
HOTEL VERSANTE LTD.

Date and Time of Search: March 21, 2025 02:39 PM Pacific Time

Currency Date: December 09, 2024

ACTIVE

Incorporation Number: BC0982997

Name of Company: HOTEL VERSANTE LTD.

Business Number: 831780234 BC0001

Recognition Date and Time: Incorporated on October 15, 2013 08:34 AM Pacific Time **In Liquidation:** No

Last Annual Report Filed: October 15, 2024 **Receiver:** No

REGISTERED OFFICE INFORMATION

Mailing Address:
1205-8400 WEST RD
RICHMOND BC V6X 0S7
CANADA

Delivery Address:
500 - 5811 COONEY RD, NORTH TOWER
RICHMOND BC V6X 3M1
CANADA

RECORDS OFFICE INFORMATION

Mailing Address:
1205-8400 WEST RD
RICHMOND BC V6X 0S7
CANADA

Delivery Address:
500 - 5811 COONEY RD, NORTH TOWER
RICHMOND BC V6X 3M1
CANADA

DIRECTOR INFORMATION

Last Name, First Name, Middle Name:
Chiu, Man Chun (Jason)

Mailing Address:
23-25/F, NEXXUS BUILDING
41 CONNAUGHT ROAD CENTRAL
HONG KONG

Delivery Address:
23-25/F, NEXXUS BUILDING
41 CONNAUGHT ROAD CENTRAL
HONG KONG

Last Name, First Name, Middle Name:

Hamdullahpur, Feridun

Mailing Address:

694 MEADOWSWEET AVENUE
WATERLOO ON N2V 0A6
CANADA

Delivery Address:

694 MEADOWSWEET AVENUE
WATERLOO ON N2V 0A6
CANADA

Last Name, First Name, Middle Name:

Lo, Chi Hang (Mark)

Mailing Address:

23/F, BLOCK 26, CELESTIAL HEIGHTS
80 SHEUNG SHING STREET HOMANTIN
HONG KONG

Delivery Address:

23/F, BLOCK 26, CELESTIAL HEIGHTS
80 SHEUNG SHING STREET HOMANTIN
HONG KONG

Last Name, First Name, Middle Name:

Wong, Stanley

Mailing Address:

606 - 1055 WEST BROADWAY
VANCOUVER BC V6H 1E2
CANADA

Delivery Address:

606 - 1055 WEST BROADWAY
VANCOUVER BC V6H 1E2
CANADA

Last Name, First Name, Middle Name:

Zhang, Rita

Mailing Address:

#1205 - 8400 WEST ROAD
RICHMOND BC V6X 0S7
CANADA

Delivery Address:

#1205 - 8400 WEST ROAD
RICHMOND BC V6X 0S7
CANADA

OFFICER INFORMATION AS AT October 15, 2024**Last Name, First Name, Middle Name:**

Ching, Chung Lin

Office(s) Held: (CEO)

Mailing Address:

#1205 - 8400 WEST ROAD
RICHMOND BC V6X 0S7
CANADA

Delivery Address:

#1205 - 8400 WEST ROAD
RICHMOND BC V6X 0S7
CANADA

Last Name, First Name, Middle Name:

Lo, Chi Hang (Mark)

Office(s) Held: (President)

Mailing Address:

23/F, BLOCK 26, CELESTIAL HEIGHTS
80 SHEUNG SHING STREET HOMANTIN
HONG KONG

Delivery Address:

23/F, BLOCK 26, CELESTIAL HEIGHTS
80 SHEUNG SHING STREET HOMANTIN
HONG KONG

This is **Exhibit "B"** referred to in the affidavit of A.
Arenas sworn before me at Vancouver, BC this 31st
day of March, 2025.



A Commissioner for taking Affidavits
For British Columbia



BC Company Summary

For
INTERNATIONAL TRADE CENTER PROPERTIES LTD.

Date and Time of Search: March 21, 2025 02:38 PM Pacific Time

Currency Date: December 09, 2024

ACTIVE

Incorporation Number: BC0909412

Name of Company: INTERNATIONAL TRADE CENTER PROPERTIES LTD.

Business Number: 820016715 BC0001

Recognition Date and Time: Incorporated on May 02, 2011 11:17 AM Pacific Time

In Liquidation: No

Last Annual Report Filed: May 02, 2024

Receiver: No

COMPANY NAME INFORMATION

Previous Company Name

HOTEL VERSANTE LTD.

Date of Company Name Change

October 15, 2013

REGISTERED OFFICE INFORMATION

Mailing Address:

SUITE 500 - NORTH TOWER
5811 COONEY ROAD
RICHMOND BC V6X 3M1
CANADA

Delivery Address:

SUITE 500 - NORTH TOWER
5811 COONEY ROAD
RICHMOND BC V6X 3M1
CANADA

RECORDS OFFICE INFORMATION

Mailing Address:

SUITE 500 - NORTH TOWER
5811 COONEY ROAD
RICHMOND BC V6X 3M1
CANADA

Delivery Address:

SUITE 500 - NORTH TOWER
5811 COONEY ROAD
RICHMOND BC V6X 3M1
CANADA

DIRECTOR INFORMATION

Last Name, First Name, Middle Name:

Ching, Mo Yeung

Mailing Address:

1205 - 8400 WEST RD
RICHMOND BC V6X 0S7
CANADA

Delivery Address:

1205 - 8400 WEST RD
RICHMOND BC V6X 0S7
CANADA

OFFICER INFORMATION AS AT May 02, 2024

Last Name, First Name, Middle Name:

Ching, Mo Yeung

Office(s) Held: (President, Secretary)

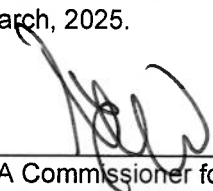
Mailing Address:

1205-8400 WEST RD
RICHMOND BC V6X 0S7
CANADA

Delivery Address:

1205-8400 WEST RD
RICHMOND BC V6X 0S7
CANADA

This is **Exhibit "C"** referred to in the affidavit of A. Arenas sworn before me at Vancouver, BC this 31st day of March, 2025.



A Commissioner for taking Affidavits
For British Columbia



BC Company Summary

For
RCC HOLDINGS LTD.

Date and Time of Search: March 13, 2025 01:26 PM Pacific Time

Currency Date: December 09, 2024

ACTIVE

Incorporation Number: BC1136674

Name of Company: RCC HOLDINGS LTD.

Business Number: 791013089 BC0001

Recognition Date and Time: Incorporated on October 05, 2017 03:30 PM Pacific Time In Liquidation: No

Last Annual Report Filed: October 05, 2022 Receiver: No

REGISTERED OFFICE INFORMATION

Mailing Address:

2900 - 550 BURNARD STREET
VANCOUVER BC V6C 0A3
CANADA

Delivery Address:

2900 - 550 BURNARD STREET
VANCOUVER BC V6C 0A3
CANADA

RECORDS OFFICE INFORMATION

Mailing Address:

2900 - 550 BURNARD STREET
VANCOUVER BC V6C 0A3
CANADA

Delivery Address:

2900 - 550 BURNARD STREET
VANCOUVER BC V6C 0A3
CANADA

DIRECTOR INFORMATION

Last Name, First Name, Middle Name:

Chiu, Man Chun (Jason)

Mailing Address:

23-25/F, NEXXUS BUILDING
41 CONNAUGHT ROAD CENTRAL
HONG KONG

Delivery Address:

23-25/F, NEXXUS BUILDING
41 CONNAUGHT ROAD CENTRAL
HONG KONG

Last Name, First Name, Middle Name:

Hamdullahpur, Feridun

Mailing Address:

694 MEADOWSWEET AVENUE
WATERLOO ON N2V 0A6
CANADA

Delivery Address:

694 MEADOWSWEET AVENUE
WATERLOO ON N2V 0A6
CANADA

Last Name, First Name, Middle Name:

Lo, Chi Hang (Mark)

Mailing Address:

23/F, BLOCK 26, CELESTIAL HEIGHTS
80 SHEUNG SHING STREET HOMANTIN
HONG KONG

Delivery Address:

23/F, BLOCK 26, CELESTIAL HEIGHTS
80 SHEUNG SHING STREET HOMANTIN
HONG KONG

Last Name, First Name, Middle Name:

Wong, Stanley

Mailing Address:

606 - 1055 WEST BROADWAY
VANCOUVER BC V6H 1E2
CANADA

Delivery Address:

606 - 1055 WEST BROADWAY
VANCOUVER BC V6H 1E2
CANADA

Last Name, First Name, Middle Name:

Zhang, Rita

Mailing Address:

#1205 - 8400 WEST ROAD
RICHMOND BC V6X 0S7
CANADA

Delivery Address:

#1205 - 8400 WEST ROAD
RICHMOND BC V6X 0S7
CANADA

OFFICER INFORMATION AS AT October 05, 2022

Last Name, First Name, Middle Name:

Ching, Chung Lin

Office(s) Held: (CEO)

Mailing Address:

#1205 - 8400 WEST ROAD
RICHMOND BC V6X 0S7
CANADA

Delivery Address:

#1205 - 8400 WEST ROAD
RICHMOND BC V6X 0S7
CANADA

Last Name, First Name, Middle Name:

Lo, Chi Hang (Mark)

Office(s) Held: (President)

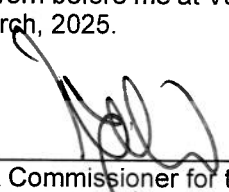
Mailing Address:

23/F, BLOCK 26, CELESTIAL HEIGHTS
80 SHEUNG SHING STREET HOMANTIN
HONG KONG

Delivery Address:

23/F, BLOCK 26, CELESTIAL HEIGHTS
80 SHEUNG SHING STREET HOMANTIN
HONG KONG

This is **Exhibit "D"** referred to in the affidavit of A. Arenas sworn before me at Vancouver, BC this 31st day of March, 2025.



A Commissioner for taking Affidavits
For British Columbia



BC Company Summary

For
CLUB VERSANTE MANAGEMENT LTD.

Date and Time of Search: March 13, 2025 10:32 AM Pacific Time

Currency Date: December 09, 2024

ACTIVE

Incorporation Number: BC0987253

Name of Company: CLUB VERSANTE MANAGEMENT LTD.

Business Number: 836531772 BC0001

Recognition Date and Time: Incorporated on December 03, 2013 02:35 PM Pacific Time

In Liquidation: No

Last Annual Report Filed: December 03, 2024

Receiver: No

COMPANY NAME INFORMATION

Previous Company Name

THE CHINA CLUB GENERAL PARTNER LTD.

Date of Company Name Change

May 09, 2017

REGISTERED OFFICE INFORMATION

Mailing Address:

1205-8400 WEST RD
RICHMOND BC V6X 0S7
CANADA

Delivery Address:

500 - 5811 COONEY RD, NORTH TOWER
RICHMOND BC V6X 3M1
CANADA

RECORDS OFFICE INFORMATION

Mailing Address:

1205-8400 WEST RD
RICHMOND BC V6X 0S7
CANADA

Delivery Address:

500 - 5811 COONEY RD, NORTH TOWER
RICHMOND BC V6X 3M1
CANADA

DIRECTOR INFORMATION

Last Name, First Name, Middle Name:

Ching, Chung Lin

Mailing Address:

1205 - 8400 WEST RD
RICHMOND BC V6X 0S7
CANADA

Delivery Address:

1205 - 8400 WEST RD
RICHMOND BC V6X 0S7
CANADA

Last Name, First Name, Middle Name:

Ching, Mo Yeung

12

Mailing Address:


1205 - 8400 WEST RD
RICHMOND BC V6X 0S7
CANADA

Delivery Address:

1205 - 8400 WEST RD
RICHMOND BC V6X 0S7
CANADA

NO OFFICER INFORMATION FILED AS AT December 03, 2024.

This is **Exhibit "E"** referred to in the affidavit of A.
Arenas sworn before me at Vancouver, BC this 31st
day of March, 2025.



A Commissioner for taking Affidavits
For British Columbia



BC Company Summary

For
1036524 B.C. LTD.

Date and Time of Search: March 20, 2025 08:15 AM Pacific Time

Currency Date: December 09, 2024

ACTIVE

Incorporation Number: BC1036524

Name of Company: 1036524 B.C. LTD.

Business Number: 821861762 BC0001

Recognition Date and Time: Incorporated on May 14, 2015 11:17 AM Pacific Time

In Liquidation: No

Last Annual Report Filed: May 14, 2024

Receiver: No

REGISTERED OFFICE INFORMATION

Mailing Address:

SUITE 2600
1090 WEST PENDER STREET
VANCOUVER BC V6E 0E3
CANADA

Delivery Address:

SUITE 2600
1090 WEST PENDER STREET
VANCOUVER BC V6E 0E3
CANADA

RECORDS OFFICE INFORMATION

Mailing Address:

SUITE 2600
1090 WEST PENDER STREET
VANCOUVER BC V6E 0E3
CANADA

Delivery Address:

SUITE 2600
1090 WEST PENDER STREET
VANCOUVER BC V6E 0E3
CANADA

DIRECTOR INFORMATION

Last Name, First Name, Middle Name:

CHING, MO YEUNG

Mailing Address:

1083 WEST 51ST AVENUE
VANCOUVER BC V6P 1C2
CANADA

Delivery Address:

1083 WEST 51ST AVENUE
VANCOUVER BC V6P 1C2
CANADA

OFFICER INFORMATION AS AT May 14, 2024

Last Name, First Name, Middle Name:
CHING, MO YEUNG

Office(s) Held: (President)

Mailing Address:

1083 WEST 51ST AVENUE
VANCOUVER BC V6P 1C2
CANADA

Delivery Address:

1083 WEST 51ST AVENUE
VANCOUVER BC V6P 1C2
CANADA

This is **Exhibit "F"** referred to in the affidavit of A. Arenas sworn before me at Vancouver, BC this 31st day of March, 2025.



A Commissioner for taking Affidavits
For British Columbia

Application number

2130000

Registration number

TMA1192109

Type(s)

Standard Characters

Category

Trademark

CIPO Status

REGISTERED

TM5 status

LIVE/REGISTRATION/Issued
and Active



The trademark application has
been registered with the Office.

Filed

2021-08-27

Registered

2023-07-26

Registration Expiry Date

2033-07-26

Registrant

1036524 B.C. Ltd.
27/F, Three Bentall Centre
595 Burrard Street
Vancouver
BRITISH COLUMBIA V7X1J2

Agent

LAWRENCE WONG
(LAWRENCE WONG &
ASSOCIATES)
210-2695 Granville Street
Vancouver
BRITISH COLUMBIA V6H3H4

Address for Service

#210 - 2695 GRANVILLE
STREET

Disclaimer text

The right to the exclusive use of the word HOTEL is disclaimed apart
from the trademark.

Index headings

VERSANTE HOTEL

Services (Nice class & Statement)

43 (1) Hotel accommodation services, resort hotel services; hotel,
restaurant and catering services;

Documents

[View documents](#)

Action History

Action	Action date	Due date	Comments
Filed	2021-08-27		
Created	2021-08-27		
Formalized	2021-08-27		
Pre-Assessment Letter Sent	2022-07-07		Goods or Services Not Acceptable
Search Recorded	2023-03-30		
Approved	2023-04-05		APPROVED BY PROGRAM EX200M1
Approval Notice Sent	2023-04-05		APPROVED BY PROGRAM EX200M1
Advertised	2023-05-03		Vol.70 Issue 3575
Registration Pending	2023-07-26		
Registered	2023-07-26	2033-07-26	