



This is the 1st affidavit
of Navi Kaile in this case
and was made on February 26, 2025

No. S-240493
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, RCC HOLDINGS LTD., AND
HEUNG KEI SUNG

RESPONDENTS

AFFIDAVIT

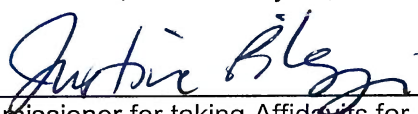
I, Navi Kaile, Legal Assistant, of suite 2700, 1133 Melville Street, in the City of Vancouver, in the
Province of British Columbia, AFFIRM AS FOLLOWS:

1. I am an employee of the firm DLA Piper (Canada) LLP, solicitors of the petitioners, Fox
Island Development Ltd. and Advanced Venture Holding Co., Ltd. (together, "**Fox Island**"),
and as such, have personal knowledge of the facts and matters hereinafter deposed to in

this affidavit, except where they are stated to be made upon information and belief and where so stated I verily believe them to be true.

2. Attached and marked as **Exhibit "A"** to this affidavit is an executed copy of the Consent to Act as Receiver and to Immediate Appointment, dated February 25, 2025, which will be filed with the registry.

AFFIRMED BEFORE ME at Vancouver,
British Columbia, on February 26, 2025



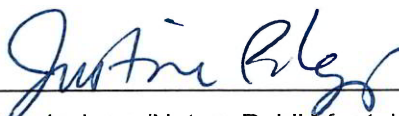
A Commissioner for taking Affidavits for
British Columbia.



Navi Kaile

Justine Pileggi
Articled Student
DLA Piper (Canada) LLP
1133 Melville Street, Suite 2700
Vancouver, BC V6E 4E5
604.687.9444

This is **Exhibit "A"** referred to in the Affidavit of Navi Kaile affirmed before me at Vancouver, British Columbia, on this 26th day of February, 2025.

A handwritten signature in blue ink, appearing to read "Justin Riley", written over a horizontal line.

A Commissioner/Notary Public for taking
Affidavits for British Columbia

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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, RCC HOLDINGS LTD., AND HEUNG KEI SUNG

RESPONDENTS

CONSENT TO ACT AS RECEIVER AND TO IMMEDIATE APPOINTMENT

Deloitte Restructuring Inc. ("**Deloitte**") is a licensed trustee within the meaning of section 2 of the *Bankruptcy and Insolvency Act*, RSC 1985, c B-3, as amended (the "**BIA**").

Deloitte hereby consents to act as receiver and to its immediate appointment as receiver and manager (in such capacity, the "**Receiver**"), without security, of all the assets, undertakings and property of International Trade Centre Properties Ltd. and Hotel Versante Ltd., (the "**Debtors**"), pursuant to the provisions of section 243 of the BIA and section 39 of the *Law and Equity Act*, R.S.B.C. 1996 c. 253, as amended, and on the terms of the Receivership Order made in this proceeding.

DATED at Vancouver, British Columbia, this 25th day of February, 2025.

Deloitte Restructuring Inc., solely in its capacity as Receiver, and not in its personal capacity

Per: 

Name: Paul Chambers

Title: Senior Vice President

No. S-240493
Vancouver Registry

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HOLDING CO., LTD.

PETITIONERS

AND:

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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, RCC HOLDINGS
LTD., AND HEUNG KEI SUNG

RESPONDENTS

CONSENT TO ACT AS RECEIVER AND TO IMMEDIATE APPOINTMENT

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File No.: 117708-00001

CDB/nk7621

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CDB/nk7621