



This is the 3rd affidavit of Sandra Brown-John in this case and was made on August 25, 2021

No. S-217202
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN

THE BANK OF NOVA SCOTIA

PETITIONER

AND

**COMMUNITY MARINE CONCEPTS LTD., VICTORIA INTERNATIONAL MARINA LTD.,
ETERNALAND YUHENG INVESTMENT HOLDING LTD., AND 0736657 B.C. LTD.**

RESPONDENTS

AFFIDAVIT

I, Sandra Brown-John, of Suite 2600, 595 Burrard Street, Vancouver, BC, legal assistant, SWEAR THAT:

1. I am a legal assistant to Peter Bychawski of Blake, Cassels & Graydon LLP ("**Blakes**"), the solicitors for The Bank of Nova Scotia (the "**Bank**"), the petitioner in this proceeding, and as such I have personal knowledge of the matters deposed to in this Affidavit except where I depose to a matter based on information from an informant I identify in which case I believe that both the information from the informant and the resulting statement are true.

2. On August 6, 2021, I attempted to effect service of the Bank's petition filed in this proceeding on August 6, 2021, together with the supporting Affidavit #1 of Beatriz Martinez sworn August 6, 2021, Affidavit #1 of Sandra Brown-John sworn August 5, 2021, and Confidential Affidavit #2 of Sandra sworn August 5, 2021 (together, the "**Petition Materials**"), by sending the Petition Materials via courier addressed to each of the Respondents at 2959 Kingsway, Vancouver, British Columbia (the "**Kingsway Address**"), being the address that is listed on the BC Company Summaries for each of the Respondents as their registered and records office as indicated on the company summaries found at Exhibit "C" to my Affidavit #1 sworn in this proceeding on August 5, 2021.

3. On August 6, 2021, Novex Delivery Solutions (“Novex”), the courier company engaged by Blakes to effect service of the Petition Materials on the Respondents at the Kingsway Address, advised Blakes’ service department that when Novex attended at the Kingsway Address there was a sign on the premises stating, “Moved to: 3631 No. 3 Road, Richmond, BC V6X 2B9” (the “Richmond Address”).

4. On August 9, 2021 I performed a Google search on both the Kingsway Address and the Richmond Address, and identified search results attributing each address to the Collingwood Law Office.

5. On August 9, 2021, I ran an updated BC Company Summary search for Community Marine Concepts Ltd., one of the Respondents, and noted that it still listed the Kingsway Address as the registered and records office of the company. Attached to this my affidavit and marked as **Exhibit “A”** is a copy of the BC Company Summary search result for Community Marine Concepts Ltd.

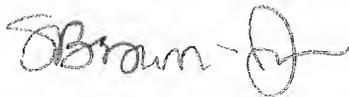
6. On August 9, 2021, at my request Novex delivered the Petition Materials addressed to each of the Respondents to the Richmond Address. Attached to this my affidavit and marked as **Exhibit “B”** is a copy of a letter from Mr. Bychawski to the Respondents dated August 9, 2021 (without enclosures) delivered by Novex together with Novex’s confirmation of delivery.

7. On August 10, 2021, I sent by email a copy of a letter from Mr. Bychawski addressed to Mr. Eric Lee together with a copy of the Petition and information on how to access the Petition Materials. Attached to this my affidavit and marked as **Exhibit “C”** is a copy of my August 10, 2021 email with the enclosed letter (but without the other referenced enclosures).

SWORN BEFORE ME at Vancouver, British Columbia on August 25, 2021


A Commissioner for taking Affidavits for British Columbia

PETER BYCHAWSKI
Barrister & Solicitor
BLAKE, CASSELS & GRAYDON LLP
Suite 2600, Three Bentall Centre
595 Burrard St., P.O. Box 49314
Vancouver, B.C. V7X 1L3
(604) 631-4218



Sandra Brown-John

This is Exhibit "A" referred to in the Affidavit of Sandra Brown-John sworn before me at Vancouver, British Columbia this 25th day of August, 2021



A Commissioner for Taking Affidavits
for British Columbia

PETER BYCHAWSKI
Barrister & Solicitor
BLAKE, CASSELS & GRAYDON LLP
Suite 2600, Three Bentall Centre
595 Burrard St., P.O. Box 49314
Vancouver, B.C. V7X 1L3
(604) 631-4218



BC Company Summary For COMMUNITY MARINE CONCEPTS LTD.

Date and Time of Search: August 09, 2021 08:53 AM Pacific Time
Currency Date: June 15, 2021

ACTIVE

Incorporation Number: BC0998190
Name of Company: COMMUNITY MARINE CONCEPTS LTD.
Business Number: 811003631 BC0001
Recognition Date and Time: Incorporated on March 31, 2014 04:16 PM Pacific Time In Liquidation: No
Last Annual Report Filed: March 31, 2020 Receiver: No

COMPANY NAME INFORMATION

Previous Company Name Date of Company Name Change
0998190 B.C. LTD. August 20, 2014

REGISTERED OFFICE INFORMATION

Mailing Address: 2959 KINGSWAY VANCOUVER BC V5R 5J4 CANADA
Delivery Address: 2959 KINGSWAY VANCOUVER BC V5R 5J4 CANADA

RECORDS OFFICE INFORMATION

Mailing Address: 2959 KINGSWAY VANCOUVER BC V5R 5J4 CANADA
Delivery Address: 2959 KINGSWAY VANCOUVER BC V5R 5J4 CANADA

DIRECTOR INFORMATION

Last Name, First Name, Middle Name: ZHANG, HUAI YIN
Mailing Address: 7371 LOMBARD ROAD RICHMOND BC V7C 3M9 CANADA
Delivery Address: 7371 LOMBARD ROAD RICHMOND BC V7C 3M9 CANADA

Last Name, First Name, Middle Name:
ZHANG, DONGXIA

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Mailing Address:
1263 BALFOUR AVENUE
VANCOUVER BC V6H 1X6
CANADA

Delivery Address:
1263 BALFOUR AVENUE
VANCOUVER BC V6H 1X6
CANADA

NO OFFICER INFORMATION FILED AS AT March 31, 2020.

This is Exhibit "B" referred to in the Affidavit of Sandra Brown-John sworn before me at Vancouver, British Columbia this 25th day of August, 2021



A Commissioner for Taking Affidavits
for British Columbia

PETER BYCHAWSKI
Barrister & Solicitor
BLAKE, CASSELS & GRAYDON LLP
Suite 2600, Three Bentall Centre
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Blake, Cassels & Graydon LLP
Barristers & Solicitors
Patent & Trade-mark Agents
595 Burrard Street, P.O. Box 49314
Suite 2600, Three Bentall Centre
Vancouver BC V7X 1L3 Canada
Tel: 604-631-3300 Fax: 604-631-3309

August 9, 2021

Peter Bychawski
Dir: 604-631-4218
peter.bychawski@blakes.com

VIA COURIER

Reference: 19350/90070

Community Marine Concepts Ltd.
260 - 3631 No. 3 Rd
Richmond, BC V6X 2B9

Victoria International Marina Ltd.
260 - 3631 No. 3 Rd
Richmond, BC V6X 2B9

Eternaland Yuheng Investment Holding Ltd.
260 - 3631 No. 3 Rd
Richmond, BC V6X 2B9

0736657 B.C. Ltd.
260 - 3631 No. 3 Rd
Richmond, BC V6X 2B9

**RE: *The Bank of Nova Scotia v. Community Marine Concepts Ltd. et al*
SCBC Vancouver Registry No. S217202**

Dear Sirs/Mesdames:

Enclosed for service upon you as the registered office of the above-noted companies are the following:

1. Petition of The Bank of Nova Scotia filed August 6, 2021;
2. Affidavit #1 of Sandra Brown-John sworn August 5, 2021;
3. Affidavit of Beatriz Martinez sworn August 6, 2021; and
4. Unfiled Confidential Affidavit of Sandra Brown-John sworn August 5, 2021; and

The Confidential Affidavit will be filed subject to the sealing order and we will provide you with a filed copy upon the granting of such order.

Please note that we attempted service of the enclosed materials on 2959 Kingsway, Vancouver, BC as that is the registered office address for the above-noted companies with BC Registry Services. However, we were advised that your office moved to 260-3631 No. 3 Rd, Richmond, BC. and are accordingly resending the enclosed for your handling as the registered office of the above-noted companies.

Yours truly,


Peter Bychawski
Encl.

Brown-John, Sandra

From: VAN DEPT CENTRAL SERVICES
Sent: Monday, August 9, 2021 4:05 PM
To: Brown-John, Sandra; Bychawski, Peter
Subject: FW: Novex Order #6725298 - Status update

Hello,

Please find below the POD as requested.

Best,

Nils Przybylla
Senior Site Service Specialist
Blake, Cassels & Graydon LLP
RICOH CANADA INC.
Email: nils.przybylla@blakes.com
Direct: 604-631-5238

From: info@novex.ca <info@novex.ca>
Sent: Monday, August 9, 2021 4:02 PM
To: VAN DEPT CENTRAL SERVICES <VANDEPTCENTRALSERVICES@blakes.com>
Subject: Novex Order #6725298 - Status update

External Email | Courrier électronique externe

novex 
DELIVERY SOLUTIONS

The status of your order #6725298 from BLAKE, CASSELS & GRAYDON LLP has been updated to: Delivered.

It was delivered to:
Julia
at 4:00 PM Monday August 09, 2021.

Delivery Information:
Community Marine Concepts LTD., Victoria International Marina LTD., Eternaland Yuheng Investment Holding LTD., & 0736657 B.C. LTD.
Attn:
260 - 3631 No. 3 Rd
Richmond, BC V6X2B9

Pieces: 1 PACKAGE
Weight: 9.600000381469727 lbs
Service: 1-SHT
Reference: PMB 19350/90070 np
Courier Instructions: POD to Sandra Brown-John

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For inquiries regarding this order, please contact 604-278-1935 or visit www.novex.ca to chat with a customer service representative.

To open an account, please contact sales@novex.ca or [apply online](#).

Novex Delivery Solutions
#105 - 14271 Knox Way
Richmond BC
V6V 2Z4
604-278-1935



This is Exhibit "C" referred to in the Affidavit of Sandra Brown-John sworn before me at Vancouver, British Columbia this 25th day of August, 2021



A Commissioner for Taking Affidavits
for British Columbia

PETER BYCHAWSKI
Barrister & Solicitor
BLAKE, CASSELS & GRAYDON LLP
Suite 2600, Three Bentall Centre
595 Burrard St., P.O. Box 49314
Vancouver, B.C. V7X 1L3
(604) 631-4218

Brown-John, Sandra

From: Brown-John, Sandra
Sent: Tuesday, August 10, 2021 3:06 PM
To: eric@vimarina.ca
Cc: Bychawski, Peter
Subject: The Bank of Nova Scotia v. Community Marine Concepts Ltd. et al, SCBC Vancouver Registry No. S217202
Attachments: 2021-08-10 - Ltr to Respondents.pdf; 2021-08-06 - Petition.pdf

Good afternoon,

Please see the attached correspondence from Mr. Bychawski of today's date.

The ShareFile link referenced in the attached letter is: <https://blakes.sharefile.com/d-s0458fec5076e4bbda3bc87c9b8008d5b>

The password to the ShareFile site will be provided by separate email for security reasons.

Sandra Brown-John
Legal Administrative Assistant to
Robin Reinertson*, Peter Bychawski,
Andrew Kavanagh and Harleen Randhawa
sandra.brownjohn@blakes.com
Dir: 604-631-4265

**Denotes Law Corporation*



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Blake, Cassels & Graydon LLP
Barristers & Solicitors
Patent & Trade-mark Agents
595 Burrard Street, P.O. Box 49314
Suite 2600, Three Bentall Centre
Vancouver BC V7X 1L3 Canada
Tel: 604-631-3300 Fax: 604-631-3309

August 10, 2021

Peter Bychawski
Dir: 604-631-4218
peter.bychawski@blakes.com

VIA EMAIL

Reference: 19350/90070

Community Marine Concepts Ltd.
1 Cooperage Place
Victoria, BC V9A 7J9

Victoria International Marina Ltd.
1 Cooperage Place
Victoria, BC V9A 7J9

Eternaland Yuheng Investment Holding Ltd.
1 Cooperage Place
Victoria, BC V9A 7J9

0736657 B.C. Ltd.
1 Cooperage Place
Victoria, BC V9A 7J9

**RE: *The Bank of Nova Scotia v. Community Marine Concepts Ltd. et al*
SCBC Vancouver Registry No. S217202**

Dear Sirs/Mesdames:

We are counsel to The Bank of Nova Scotia.

We enclose for reference a copy of our client's petition filed on August 6, 2021 and served on the registered and records office of each of the respondents on August 9, 2021.

Due to their large size, we are proving the materials referenced in the petition through ShareFile. The ShareFile link and password to the materials will provided by email.

We encourage you to immediately seek legal advice with respect to this matter.

Yours truly,

Peter Bychawski

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TORONTO

CALGARY

VANCOUVER

MONTRÉAL

OTTAWA

NEW YORK

LONDON

Blake, Cassels & Graydon LLP | blakes.com