



Affidavit #1 of Jonathan B. Ross
Sworn: June 5, 2025

No. S015937
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

BANK OF CHINA

PLAINTIFF/ JUDGMENT CREDITOR

AND:

XU CHAO FAN, also known as Hui Yat Fai; XU GAO JUN, also known as Xu Juo Jun, Xu Guo Jun, Kit Sun Hui; Hui Kit Shun Hui Kit Sun and Hui Kit Chun; YU ZHEN DONG, also known as Xu Zhen Dong, Yu Zhen-Dong, Yu Wing Chung, Yu Zhan Dong, Yu Wing Chong and Yu Chun Tung; KWONG WA PO; CINDY CHING YIU-CHU, also known as Sindy Ching, Ching Yu-Chu Sindy, Ching Fo-Chu and Ching Yu-Chu; KUANG WAN FANG, also known as Wendy Wan Fang Kuang; YING YI YU, also known as Yu Yung Yi; FION XU HUI YU, also known as Fion Yu and Xu Hu Yu; LI CONG XU; SIU LING YAN; XIA LI XU, also known as Carolyn Xia Li Xu and Carolyn X Xu; FAL KWONG CHING, also known as Fo Kong Ching, Fo Kong Cheung and Connie Fal Kwong Ching; WEN JING TAN; XU LIE MING; XU GANG QIANG; XU BIN YAN; TANG JIE YU, also known as Jie Yu Tang, Tan Jie Yu and Jie Yu Tan; YU BAO QUON, also known as Bao Quon Yu, Yu Bao Quan and Quan Bao Yu; LIANG BIN JIN; LIANG CUI E; and JOHN DOE

DEFENDANTS/ JUDGMENT DEBTORS

AFFIDAVIT

I, **JONATHAN B. ROSS**, Barrister and Solicitor, of 2300 – 550 Burrard Street, Vancouver, British Columbia, MAKE OATH AND SAY AS FOLLOWS:

1. I am a partner with the firm of Gowling WLG (Canada) LLP ("**Gowling**"), counsel for Alvarez & Marsal Canada Inc., in its capacity as court-appointed receiver (the "**Receiver**") of Kuang Wan Fang, also known as Wendy Wan Fang Kuang, also known as Wan Fang Kuang, and as such have personal knowledge of the facts and matters hereinafter deposed to save and except where the same are stated to be made upon information and belief and where so stated I verily believe them to be true.

2. I have been a member of the Law Society of British Columbia since 2008. Since that time, I have primarily acted in insolvency, restructuring and realization mandates in British Columbia. I have extensive experience in acting for receivers, trustees and secured creditors in insolvency proceedings.

3. I am the lawyer at Gowling who has had primary carriage of this matter and I am authorized to make this affidavit on behalf of Gowling.

4. Gowling was retained by the Receiver to act as its independent counsel on these receivership proceedings.

5. Attached hereto and marked as **Exhibit "A"** to this my Affidavit, is a copy of the invoices (the "**Gowling Invoices**") issued by Gowling to the Receiver for fees which were necessarily incurred in fulfilling the instructions of the Receiver. The Gowling Invoices have been redacted where appropriate to preserve solicitor-client privilege in this ongoing matter.

6. The accounts of Gowling issued to the Receiver in this proceeding can be summarized as follows:

INVOICE #	FOR THE PERIOD	FEES \$	DISB. \$	GST \$	PST \$	TOTAL \$
20021949	March 5, 2021 to February 28, 2023	\$3,614.00	\$25.50	\$180.70	\$252.98	\$4,073.18
20032096	March 1 to 31, 2023	\$1,140.00	NIL	\$57.00	\$79.80	\$1,276.80
20137906	April 1, 2023 to September 30, 2023	\$25,280.00	\$829.31	\$1,303.12	\$1,769.60	\$29,182.03
20155200	October 1 to 31, 2023	\$3,120.00	\$34.04	\$157.70	\$218.40	\$3,530.14
20203802	November 1 to December 31, 2023	\$660.00	\$0.92	\$33.05	\$46.20	\$740.17
20326815	January 1 to June 30, 2024	\$1,234.00	\$42.75	\$61.98	\$86.38	\$1,425.11
TOTALS:		\$35,048.00	\$932.52	\$1,793.55	\$2,453.36	\$40,227.43

7. As detailed in the Gowling Invoices, for the period from March 5, 2021 to June 30, 2024, Gowling invoiced fees amounting to \$35,048.00 and incurred and invoiced disbursements in the amount of \$932.52 and taxes in the amount of \$1,793.55 in GST and \$2,453.36 in PST for a total amount of \$40,227.43.

8. The Gowling fees set out in the Gowling Invoices are calculated based on the hours spent by Gowling personnel, multiplied by the applicable standard hourly rates charged by Gowling. The other amounts claimed on the Gowling Invoices consists of applicable taxes (PST and GST) and disbursements incurred by Gowling.

9. The total time comprised in the said accounts is **64.7** hours broken down as follows:

PROFESSIONAL	HOURS
Jonathan B. Ross	53.20
Manuel Dominguez	7.20
Azadeh Kharazmi	2.80
Anita Yuk	1.00
Nancy Power	0.30
Kathy Jiang	0.20
Total Hours	64.70

10. The services comprised in the accounts of Gowling set out above relate to advising and representing the Receiver in these proceedings, including advising the Receiver with regard to the appointment, reviewing and preparing court materials, considering the legal issues that arose, conferencing with counsel for the Bank of China, and advising on matters relating to the taking possession of the subject property, the sale transaction for the subject property, addressing various tax filings, and tenant matters.

11. To the best of my knowledge, information and belief, the information contained in the Gowling Invoices is true and accurate in all respects as to:

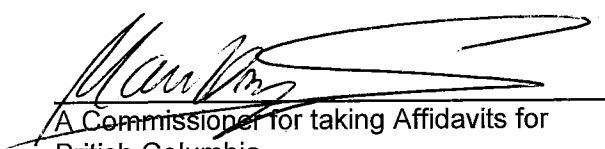
- (a) the numbers of hours worked;
- (b) the nature of work performed;
- (c) the identity of the individuals who performed the work; and
- (d) the rates charged for the worked performed.

12. I have reviewed the Gowling Invoices and verily believe that:

- (a) Gowling's fees were charged at the firm's standard rates and are, from my experience, consistent with the fees charged by similar law firms of a similar size for work of a similar nature and complexity;
- (b) Gowling's professional fees and disbursements have been properly incurred and are fair and reasonable in the circumstances;
- (c) Gowling's professional services were provided in a prudent and economical manner; and
- (d) the Gowling Invoices were provided to the Receiver when rendered, and have been approved by the Receiver.

13. I make this affidavit for the sole purposes of the Receiver's application to, among other things, approve its accounts and the Gowling Invoices, and for no other purpose. Nothing herein is a waiver of solicitor-client privilege by the Receiver.

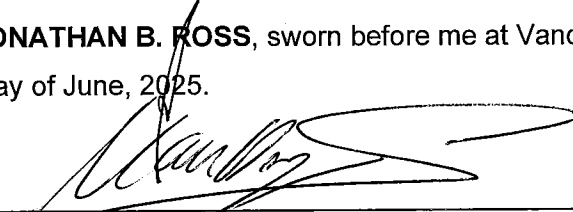
SWORN BEFORE ME at Vancouver, BC,
on the 5th day of June, 2025.


A Commissioner for taking Affidavits for
British Columbia.


JONATHAN B. ROSS

MANUEL DOMINGUEZ
GOWLING WLG (CANADA) LLP
BARRISTER & SOLICITOR
550 BURRARD STREET - SUITE 2300
BENTALL 5 - VANCOUVER, B.C. V6C 2B5
TELEPHONE: (604) 891-2772

This is Exhibit "A" referred to in the Affidavit
of **JONATHAN B. ROSS**, sworn before me at Vancouver, BC, this
5th day of June, 2025.



A Commissioner for taking Affidavits in British Columbia



Invoice

Alvarez & Marsal Canada Inc.
ATTN: Vicki J. Chan
Vice President
925 West Georgia Street
Suite 902, Cathedral Place
Vancouver BC V6C 3L2

March 21, 2023
INVOICE: 20021949

Our Matter: V53261 / 217991
RE: FANG, Kuang Wan

		GST (5.0%)	PST (7.0%)
Fees for Professional Services	\$3,614.00	\$180.70	\$252.98
Disbursements (Non-Taxable)	<u>25.50</u>		
Total Disbursements	25.50	0.00	0.00
Total Fees and Disbursements	3,639.50		
Total Taxes	433.68	180.70	252.98
Total Invoice	4,073.18		
Please remit balance due:	In Canadian Dollars	\$4,073.18	

Important Notice: Please Read

Please make all payments by wire transfer or electronic funds transfer (EFT)

Our complete banking details are on the remittance copy (last page) of this invoice. If you have any questions, please contact payments.ca@gowlingwlg.com

Jonathan B. Ross

Signed for & on behalf of Gowling WLG (Canada) LLP

Our services are provided in accordance with our Terms of Business (www.gowlingwlg.com/TermsOfBusiness), subject to any other written engagement agreement entered into between the parties.

GOWLING WLG (CANADA) LLP
550 Burrard Street, Suite 2300, Bentall 5,
Vancouver, British Columbia, V6C 2B5, Canada
GST/HST: 11936 4511 RT | PST: 1008-2519

T +1 (604) 683 6498
gowlingwlg.com

Gowling WLG (Canada) LLP is a member of Gowling WLG, an international law firm which consists of independent and autonomous entities providing services around the world. Our structure is explained in more detail at www.gowlingwlg.com/legal



March 21, 2023
INVOICE: 20021949

Alvarez & Marsal Canada Inc.
Our Matter: V53261
FANG, Kuang Wan

PROFESSIONAL SERVICES

Date	Hours	Timekeeper	Description
2021-03-05	0.20	Jonathan Ross	Correspondence with J. Bradshaw re order;
2021-03-08	0.10	Jonathan Ross	Email to J. Bradshaw;
2021-03-09	0.20	Jonathan Ross	Telephone conversation with J. Bradshaw re draft materials and receiver's charge;
2021-03-10	0.30	Nancy Powers	Conduct due diligence;
2021-03-10	3.50	Jonathan Ross	Review and comment on Receivership application materials; correspondence with V. Chan re same; telephone conversation with J. Bradshaw; further correspondence with V. Chan;
2021-03-12	0.10	Jonathan Ross	Correspondence from D. Yang; review of order on title;
2021-03-16	0.30	Jonathan Ross	Correspondence to V. Chan re order; email to J. Bradshaw re order;
2021-03-30	0.50	Jonathan Ross	Review revised form of order and provide comments on same; correspondence with V. Chan;
2021-05-27	0.10	Jonathan Ross	Correspondence from J. Bradshaw re. updated timing;
2021-10-14	0.10	Jonathan Ross	Correspondence to J. Bradshaw re status;
2021-11-23	0.70	Jonathan Ross	Telephone conference with V. Chan and J. Bradshaw re intended appointment;
2022-02-09	0.30	Jonathan Ross	Telephone call from J. Bradshaw re status update and service matters;
2022-02-17	0.40	Jonathan Ross	Telephone conversation with J. Bradshaw re [REDACTED];
2023-02-27	0.30	Jonathan Ross	Correspondence from J. Bradshaw re. instructions to proceed and affidavit materials;
2023-02-28	0.20	Jonathan Ross	Correspondence with V. Chan;

Total Fees for Professional Services

\$3,614.00

DISBURSEMENTS

Minister of Finance - Agency

\$25.50

Total Disbursements

\$25.50

Terms: payment due within 30 days of invoice date
Interest at the rate of 4.0% per annum will be charged on all amounts not paid within 30 days of invoice date
Errors and omissions excluded



March 21, 2023
INVOICE: 20021949

Remittance Copy

Client: 217991 Alvarez & Marsal Canada Inc.
Matter: V53261
RE: FANG, Kuang Wan
Amount Due: \$4,073.18 CAD

PAYMENT BY CHEQUE:

Please return this page with your payment payable to **Gowling WLG (Canada) LLP**

Remit to: Gowling WLG (Canada) LLP
PO Box 466, STN D
Ottawa, ON K1P 1C3
Canada

PAYMENT BY WIRE TRANSFER:

Pay by Swift MT 103 Direct to:
SWIFTCODE: CIBCCATT

BENEFICIARY BANK: Canadian Imperial Bank of Commerce
84 Bank Street, Ottawa, ON K1P 5N4

TRANSIT NUMBER: 0010-00186

BENEFICIARY ACCOUNT NAME: Gowling WLG (Canada) LLP
160 Elgin Street, Suite 2600, Ottawa, ON K1P 1C3

BENEFICIARY ACCOUNT NUMBER(S): CDN Account: 41-02916
USD Account: 02-21015

US Corresponding Bank for US Dollar wires:
Wells Fargo Bank, N.A. BIC: PNBPU33NNYC - ABA:026005092

If paying by wire transfer or corporate EFT please e-mail the remittance details to
payments.ca@gowlingwlg.com

Please note that we cannot accept payment by Interac e-Transfer®



Invoice

Alvarez & Marsal Canada Inc.
ATTN: Vicki J. Chan
Vice President
925 West Georgia Street
Suite 902, Cathedral Place
Vancouver BC V6C 3L2

March 31, 2023
INVOICE: 20032096

Our Matter: V53261 / 217991
RE: FANG, Kuang Wan

		GST (5.0%)	PST (7.0%)
Fees for Professional Services	\$1,140.00	\$57.00	\$79.80
Total Fees	1,140.00		
Total Taxes	136.80	57.00	79.80
Total Invoice	1,276.80		
Please remit balance due:	In Canadian Dollars	\$1,276.80	

Important Notice: Please Read

Please make all payments by wire transfer or electronic funds transfer (EFT)

Our complete banking details are on the remittance copy (last page) of this invoice. If you have any questions, please contact payments.ca@gowlingwlg.com.

Jonathan B. Ross

Signed for & on behalf of Gowling WLG (Canada) LLP

Our services are provided in accordance with our Terms of Business (www.gowlingwlg.com/TermsOfBusiness), subject to any other written engagement agreement entered into between the parties.

GOWLING WLG (CANADA) LLP
550 Burrard Street, Suite 2300, Bentall 5,
Vancouver, British Columbia, V6C 2B5, Canada
GST/HST: 11936 4511 RT | PST: 1008-2519

T +1 (604) 683 6498
gowlingwlg.com

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March 31, 2023
INVOICE: 20032096

Alvarez & Marsal Canada Inc.
Our Matter: V53261
FANG, Kuang Wan

PROFESSIONAL SERVICES

Date	Hours	Timekeeper	Description	
2023-03-02	0.50	Jonathan Ross	Review most recent versions; request updates; telephone call to V. Chan re pending appointment;	
2023-03-03	0.80	Jonathan Ross	Review entered Receivership Order; telephone call to V. Chan re access and taking possession, and draft letter; email from V. Chan re attendance issues;	
2023-03-06	0.50	Jonathan Ross	Telephone call to V. Chan and A. Tillman re access to the property and tenant issues;	
2023-03-21	0.10	Jonathan Ross	Review update from V. Chan;	
Total Fees for Professional Services				<u>\$1,140.00</u>

Terms: payment due within 30 days of Invoice date
Interest at the rate of 4.0% per annum will be charged on all amounts not paid within 30 days of Invoice date
Errors and omissions excluded



March 31, 2023
INVOICE: 20032096

Remittance Copy

Client: 217991 Alvarez & Marsal Canada Inc.
Matter: V53261
RE: FANG, Kuang Wan
Amount Due: \$1,276.80 CAD

PAYMENT BY CHEQUE:

Please return this page with your payment payable to **Gowling WLG (Canada) LLP**

Remit to: Gowling WLG (Canada) LLP
PO Box 466, STN D
Ottawa, ON K1P 1C3
Canada

PAYMENT BY WIRE TRANSFER:

Pay by Swift MT 103 Direct to:
SWIFTCODE:

CIBCCATT

BENEFICIARY BANK:

Canadian Imperial Bank of Commerce
84 Bank Street, Ottawa, ON K1P 5N4

TRANSIT NUMBER:

0010-00186

BENEFICIARY ACCOUNT NAME:

Gowling WLG (Canada) LLP
160 Elgin Street, Suite 2600, Ottawa, ON K1P 1C3

BENEFICIARY ACCOUNT NUMBER(S):

CDN Account: 41-02916
USD Account: 02-21015

US Corresponding Bank for US Dollar wires:

Wells Fargo Bank, N.A. BIC: PNBPU33NNYC - ABA:026005092

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Please note that we cannot accept payment by Interac e-Transfer®



Invoice

Alvarez & Marsal Canada Inc.
ATTN: Vicki J. Chan
Vice President
925 West Georgia Street
Suite 902, Cathedral Place
Vancouver BC V6C 3L2

October 16, 2023
INVOICE: 20137906

Our Matter: V53261 / 217991
RE: FANG, Kuang Wan

		GST (5.0%)	PST (7.0%)
Fees for Professional Services	\$25,280.00	\$1,264.00	\$1,769.60
Disbursements (Taxable)	782.31		
Disbursements (Non-Taxable)	47.00		
Total Disbursements	829.31	39.12	0.00
Total Fees and Disbursements	26,109.31		
Total Taxes	3,072.72	1,303.12	1,769.60
Total Invoice	29,182.03		
Please remit balance due:	In Canadian Dollars	\$29,182.03	

Important Notice: Please Read**Please make all payments by wire transfer or electronic funds transfer (EFT)**

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Jonathan B. Ross

Signed for & on behalf of Gowling WLG (Canada) LLP

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October 16, 2023
INVOICE: 20137906

Alvarez & Marsal Canada Inc.
Our Matter: V53261
FANG, Kuang Wan

PROFESSIONAL SERVICES

Date	Hours	Timekeeper	Description
2023-05-10	0.80	Jonathan Ross	Review of addendum to listing agreement; review and revise draft addendum to sale agreement; telephone call to V. Chan re same;
2023-05-26	0.20	Jonathan Ross	Email from V. Chan re listing agreement and response;
2023-06-19	0.50	Jonathan Ross	Telephone call to V. Chan and J. Bradshaw re tax issues;
2023-06-26	0.20	Jonathan Ross	Correspondence from J. Bradshaw;
2023-06-27	0.20	Jonathan Ross	Correspondence from V. Chan;
2023-08-09	1.00	Jonathan Ross	Correspondence from V. Chan re. [REDACTED]; correspondence with A. Yuk re. same; review offer to sell and provide comments to V. Chan re. same;
2023-08-10	0.10	Jonathan Ross	Correspondence from J. Bradshaw;
2023-08-11	1.20	Jonathan Ross	Various correspondence from V. Chan re. offer; telephone conference with A. Yuk re. [REDACTED]; telephone conference with V. Chan re. revisions to offer;
2023-08-11	1.00	Anita Yuk	Analyze draft clause re [REDACTED]; research and analyze [REDACTED]; email advice and high level comments re same; confer with J. Ross re same;
2023-08-14	0.30	Manuel Dominguez	Receiving instructions from J. Ross; reviewing email communication re instructions from client;
2023-08-14	0.50	Jonathan Ross	Correspondence from V. Chan re executed agreement and scheduling of approval order; correspondence from J. Bradshaw; instruct M. Dominguez re preparation of application materials;
2023-08-15	2.10	Manuel Dominguez	Reviewing receivership order and materials under the file; reviewing precedents;
2023-08-15	1.80	Jonathan Ross	Telephone conference with J. Bradshaw and V. Chan re tax matters and court approval; email to B. Kerr re [REDACTED]; review relevant case law;
2023-08-16	2.10	Manuel Dominguez	Reviewing contract of purchase and sale; call with A. Kharazmi re precedents; drafting notice of application; reviewing model order; updating model order;
2023-08-16	0.50	Jonathan Ross	Correspondence from J. Bradshaw re ITN application; conference with M. Dominguez re form of vesting order; email to V. Chan and response; email from V. Chan to J. Bradshaw;

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Errors and omissions excluded



October 16, 2023
INVOICE: 20137906

2023-08-17	0.80	Jonathan Ross	Correspondence from V. Chan and response re status; telephone call to accountant re estimate;
2023-08-18	0.20	Jonathan Ross	Voicemail to M. Dobslaw re correspondence from M. Carroll on rent payments;
2023-08-21	0.10	Jonathan Ross	Voicemail from V. Chan;
2023-08-25	0.80	Manuel Dominguez	Updating and reviewing drafts;
2023-08-25	1.20	Jonathan Ross	Review and comment on application materials; correspondence to M. Dominguez re same; telephone call to V. Chan;
2023-08-26	0.20	Jonathan Ross	Confer with M. Dominguez re draft materials;
2023-08-28	3.50	Jonathan Ross	Review and revise form of certificate and materials; email to V. Chan re application materials; review and revise short leave materials; correspondence to J. Bradshaw re service materials; review and consider [REDACTED]; review and revise form of order based on comments from V. Chan; email to V. Chan;
2023-08-29	0.60	Jonathan Ross	Receive and review draft report from V. Chan and comments on application materials;
2023-08-30	0.90	Manuel Dominguez	Reviewing drafts from Alvarez and Marsal for J. Ross; updating materials; reviewing first report of the receiver;
2023-08-31	0.70	Manuel Dominguez	Reviewing report; reviewing updated report from J. Ross; updating notice of application;
2023-08-31	0.80	Jonathan Ross	Review and comment on Receiver's report and revise form of order; e-mail to V. Chan re. same; review [REDACTED]; e-mail to J. Bradshaw re. same;
2023-09-01	4.00	Jonathan Ross	Telephone call to V. Chan; e-mail from V. Chan with instructions; urgent finalization of application materials and short leave materials; attend court to obtain short leave; report to client re. same; instruct service; telephone call from J. Bradshaw re. language of order and review precedent language;
2023-09-04	0.20	Jonathan Ross	Review tracking updates re service;
2023-09-05	0.80	Jonathan Ross	Consider [REDACTED]; review and revise draft materials; review correspondence from V. Chan and respond to same;
2023-09-06	2.00	Jonathan Ross	Review and revise form of order; e-mail to V. Chan and J. Bradshaw re. same; telephone conference with J. Bradshaw and V. Chan (x2) re. closing procedures and form of order; e-mail to J. Bradshaw and V. Chan re. revised form of order; telephone call to V. Chan; e-mail to proposed counsel for purchaser;
2023-09-07	0.30	Manuel Dominguez	Assisting M. Salonga with revised order;
2023-09-07	1.80	Jonathan Ross	Review revise and finalize chambers record materials and form of order; correspondence from buyer's counsel and address same; review blackline of order; correspondence with V. Chan re. court attendance; preparations for hearing;

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Errors and omissions excluded



October 16, 2023
INVOICE: 20137906

2023-09-08	5.00	Jonathan Ross	Review court materials and prepare submissions for approval of sale order; attend court and obtain approval and sale order; confer with J. Bradshaw re. next steps; report to V. Chan; confer with V. Chan re. same;
2023-09-11	0.30	Jonathan Ross	Review date change addendum; correspondence with J. Bradshaw;
2023-09-12	0.20	Jonathan Ross	Review conveyancing information;
2023-09-19	0.10	Jonathan Ross	Correspondence from V. Chan and correspondence to buyer's counsel;
2023-09-20	0.70	Azadeh Kharazmi	Receive instructions from counsel to draft and prepare undertaking letter for purchaser's lawyer; request and order certified copy of the Order from the Registry;
2023-09-20	0.40	Jonathan Ross	Various correspondence with counsel for the buyer and reporting to V. Chan;
2023-09-21	3.00	Jonathan Ross	Review and revise closing documents and undertaking letter; correspondence to V. Chan re same; telephone call from V. Chan; review comments from V. Chan and consider same;
2023-09-22	1.50	Jonathan Ross	Instructions to paralegal re statement of adjustments; correspondence to J. Bradshaw re proposed undertaking letter; telephone call to J. Bradshaw; correspondence to V. Chan; review and finalize statement of adjustments;
2023-09-25	1.20	Jonathan Ross	Correspondence to V. Chan re. execution of statement of adjustments; correspondence and telephone call with buyer's counsel re. undertakings; e-mail revising undertakings;
2023-09-26	0.90	Azadeh Kharazmi	Receive and review email from law firm enclosing sale proceeds; draft and prepare trust deposit form and letter to the City of Richmond for payment of outstanding taxes and utilities for counsel's review and execution;
2023-09-26	0.40	Azadeh Kharazmi	Request final meter reading from the City of Richmond;
2023-09-26	0.60	Jonathan Ross	Correspondence to V. Chan re. receipt of funds; instruct preparation of direction to pay and review and finalize same; confirm amounts due on taxes and utilities; finalize payment of same;
2023-09-27	0.50	Jonathan Ross	Confirm payment of taxes and utilities;
2023-09-28	0.70	Jonathan Ross	Address payment of proceeds to receiver;

Total Fees for Professional Services

\$25,280.00

Terms: payment due within 30 days of invoice date
Interest at the rate of 5.3% per annum will be charged on all amounts not paid within 30 days of invoice date
Errors and omissions excluded



October 16, 2023
INVOICE: 20137906

DISBURSEMENTS

Taxable Costs

Copying	\$9.75
Scanning Service	\$59.25
Trust Administration Fee - Law Society	\$15.00
Colour Copy Recoveries	\$194.00
Courier	\$51.93
Courier - FedEx	\$255.48
Court Costs - Taxable	\$113.90
Court Fees	\$83.00
Total Taxable Disbursements	<u>\$782.31</u>

Non-Taxable Costs

Minister of Finance - Agency	\$7.00
Court Costs - Agency	\$40.00
Total Non-Taxable Disbursements	<u>\$47.00</u>

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Errors and omissions excluded



October 16, 2023
INVOICE: 20137906

Remittance Copy

Client: 217991 Alvarez & Marsal Canada Inc.
Matter: V53261
RE: FANG, Kuang Wan
Amount Due: \$29,182.03 CAD

PAYMENT BY CHEQUE:

Please return this page with your payment payable to **Gowling WLG (Canada) LLP**

Remit to: Gowling WLG (Canada) LLP
PO Box 466, STN D
Ottawa, ON K1P 1C3
Canada

PAYMENT BY WIRE TRANSFER:

Pay by Swift MT 103 Direct to:
SWIFT CODE:

CIBCCATT

BENEFICIARY BANK:

Canadian Imperial Bank of Commerce
84 Bank Street, Ottawa, ON K1P 5N4

TRANSIT NUMBER:

0010-00186

BENEFICIARY ACCOUNT NAME:

Gowling WLG (Canada) LLP
160 Elgin Street, Suite 2600, Ottawa, ON K1P 1C3

BENEFICIARY ACCOUNT NUMBER(S):

CDN Account: 41-02916
USD Account: 02-21015

US Corresponding Bank for US Dollar wires:

Wells Fargo Bank, N.A. BIC: PNBPU3NNYC - ABA:026005092

If paying by wire transfer or corporate EFT please e-mail the remittance details to
payments.ca@gowlingwlg.com


GOWLING WLG

Invoice

Alvarez & Marsal Canada Inc.
 ATTN: Vicki J. Chan
 Vice President
 925 West Georgia Street
 Suite 902, Cathedral Place
 Vancouver BC V6C 3L2

November 14, 2023
 INVOICE: 20155200

Our Matter: V53261 / 217991
 RE: FANG, Kuang Wan

		GST (5.0%)	PST (7.0%)
Fees for Professional Services	\$3,120.00	\$156.00	\$218.40
Disbursements (Taxable)	34.04		
Total Disbursements	34.04	1.70	0.00
Total Fees and Disbursements	3,154.04		
Total Taxes	376.10	157.70	218.40
Total Invoice	3,530.14		
Please remit balance due:	In Canadian Dollars	\$3,530.14	

Important Notice: Please Read

Please make all payments by wire transfer or electronic funds transfer (EFT)

Our complete banking details are on the remittance copy (last page) of this invoice. If you have any questions, please contact payments.ca@gowlingwlg.com

Jonathan B. Ross

Signed for & on behalf of Gowling WLG (Canada) LLP

Our services are provided in accordance with our Terms of Business (www.gowlingwlg.com/TermsOfBusiness), subject to any other written engagement agreement entered into between the parties.

GOWLING WLG (CANADA) LLP
 550 Burrard Street, Suite 2300, Bentall 5,
 Vancouver, British Columbia, V6C 2B5, Canada
 GST/HST: 11936 4511 RT | PST: 1008-2519

T +1 (604) 683 6498
gowlingwlg.com

Gowling WLG (Canada) LLP is a member of Gowling WLG, an international law firm which consists of independent and autonomous entities providing services around the world. Our structure is explained in more detail at www.gowlingwlg.com/legal



November 14, 2023
INVOICE: 20155200

Alvarez & Marsal Canada Inc.
Our Matter: V53261
FANG, Kuang Wan

PROFESSIONAL SERVICES

Date	Hours	Timekeeper	Description
2023-10-11	0.80	Azadeh Kharazmi	Receive and review special final metered reading for the property; draft and prepare cheque requisition paying the final meter reading along with letter to the City of Richmond for counsel's review and execution;
2023-10-12	0.30	Jonathan Ross	Receive and review tax number information; telephone call from J. Bradshaw re next steps;
2023-10-13	0.40	Jonathan Ross	Telephone call to V. Chan re next steps and [REDACTED];
2023-10-16	0.20	Jonathan Ross	Payment of final utilities and correspondence from V. Chan;
2023-10-17	0.50	Jonathan Ross	Correspondence from V. Chan re R&D Statement and information; telephone call from J. Bradshaw re options;
2023-10-19	0.50	Jonathan Ross	Telephone call to J. Bradshaw re next steps; correspondence to V. Chan;
2023-10-20	1.20	Jonathan Ross	Conference with V. Chan; conference with J. Bradshaw and V. Chan; correspondence with V. Chan regarding [REDACTED];
2023-10-25	1.30	Jonathan Ross	Draft letter to purchaser re extension; correspondence to V. Chan; review proof of payment;
2023-10-26	0.20	Jonathan Ross	Correspondence to V. Chan; finalize letter;
2023-10-27	0.20	Jonathan Ross	Finalize letter;

Total Fees for Professional Services

\$3,120.00

DISBURSEMENTS

Taxable Costs

Courier

\$34.04

Total Taxable Disbursements

\$34.04

Terms: payment due within 30 days of invoice date
Interest at the rate of 5.3% per annum will be charged on all amounts not paid within 30 days of invoice date
Errors and omissions excluded



November 14, 2023
INVOICE: 20155200

Remittance Copy

Client: 217991 Alvarez & Marsal Canada Inc.
Matter: V53261
RE: FANG, Kuang Wan
Amount Due: \$3,530.14 CAD

PAYMENT BY CHEQUE:

Please return this page with your payment payable to **Gowling WLG (Canada) LLP**

Remit to: Gowling WLG (Canada) LLP
PO Box 466, STN D
Ottawa, ON K1P 1C3
Canada

PAYMENT BY WIRE TRANSFER:

Pay by Swift MT 103 Direct to:
SWIFTCODE:

CIBCCATT

BENEFICIARY BANK:

Canadian Imperial Bank of Commerce
84 Bank Street, Ottawa, ON K1P 5N4

TRANSIT NUMBER:

0010-00186

BENEFICIARY ACCOUNT NAME:

Gowling WLG (Canada) LLP
160 Elgin Street, Suite 2600, Ottawa, ON K1P 1C3

BENEFICIARY ACCOUNT NUMBER(S):

CDN Account: 41-02916
USD Account: 02-21015

US Corresponding Bank for US Dollar wires:

Wells Fargo Bank, N.A. BIC: PNBPU3NNYC - ABA:026005092

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GOWLING WLG

Invoice

Alvarez & Marsal Canada Inc.
ATTN: Vicki J. Chan
Vice President
925 West Georgia Street
Suite 902, Cathedral Place
Vancouver BC V6C 3L2

December 31, 2023
INVOICE: 20203802

Our Matter: V53261 / 217991
RE: FANG, Kuang Wan

		GST (5.0%)	PST (7.0%)
Fees for Professional Services	\$660.00	\$33.00	\$46.20
Disbursements (Taxable)	0.92		
Total Disbursements	0.92	0.05	0.00
Total Fees and Disbursements	660.92		
Total Taxes	79.25	33.05	46.20
Total Invoice	740.17		
Please remit balance due:	In Canadian Dollars	\$740.17	

Important Notice: Please Read

Please make all payments by wire transfer or electronic funds transfer (EFT)

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Jonathan B. Ross

Signed for & on behalf of Gowling WLG (Canada) LLP

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December 31, 2023

INVOICE: 20203802

Alvarez & Marsal Canada Inc.
 Our Matter: V53261
 FANG, Kuang Wan

PROFESSIONAL SERVICES

Date	Hours	Timekeeper	Description
2023-11-19	0.10	Jonathan Ross	Correspondence from J. Bradshaw re ITN information; email to V. Chan;
2023-12-18	0.40	Jonathan Ross	Telephone call to V. Chan re next steps;
2023-12-19	0.40	Jonathan Ross	Telephone call from V. Chan re position; emails from V. Chan;
2023-12-29	0.20	Jonathan Ross	Correspondence to V. Chan re. [REDACTED];

Total Fees for Professional Services\$660.00**DISBURSEMENTS****Taxable Costs**

Postage

\$0.92

Total Taxable Disbursements\$0.92

Terms: payment due within 30 days of invoice date
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 Errors and omissions excluded



December 31, 2023
INVOICE: 20203802

Remittance Copy

Client: 217991 Alvarez & Marsal Canada Inc.
Matter: V53261
RE: FANG, Kuang Wan
Amount Due: \$740.17 CAD

PAYMENT BY WIRE TRANSFER:

BENEFICIARY BANK: Canadian Imperial Bank of Commerce
BANK ADDRESS: 84 Bank Street, Ottawa, ON K1P 5N4
BANK NUMBER: 0010
TRANSIT NUMBER: 00186

BENEFICIARY ACCOUNT NAME: Gowling WLG (Canada) LLP
BENEFICIARY ADDRESS: 160 Elgin Street, Suite 2600, Ottawa, ON K1P 1C3
BENEFICIARY ACCOUNT NUMBER(S): CDN Account: 41-02916
USD Account: 02-21015

BBCC/ ROUTING NUMBER: CC001000186
ADDITIONAL MANDATORY INFO: Invoice number(s)/Payment details
If your bank does not accept the BBCC as part of the wire instructions, it must be included in the notes with the Additional Mandatory Information.

For accurate and timely processing, please email a copy of your payment confirmation to payments.ca@gowlingwlg.com

Additional information that may be required for payments from outside Canada:

Pay by Swift MT 103 Direct to SwiftCode: CIBCCATTXXX
For USD Payments from Foreign Banks our Wells Fargo Bank, N.A.
Intermediary US Corresponding bank is: BIC: PNBUS3NNYC
ABA:026005092

Wells Fargo is not the beneficiary bank. Our beneficiary bank is the Canadian Imperial Bank of Commerce.

PAYMENT BY CHEQUE:

REMIT TO: Gowling WLG (Canada) LLP
PO Box 466, STN D
Ottawa, ON K1P 1C3
Canada

Please return this page with your payment payable to Gowling WLG (Canada) LLP

PAYMENT BY Interac E-TRANSFER:

Please send payment to payments.ca@gowlingwlg.com
Include the invoice numbers/payment details in the notes section of the Interac e-transfer.
This will result in an automatic deposit to our account and no password is required.

If you receive another email or other electronic communication purporting to be from our firm changing details of the above payment information, please do not act on the communication but contact us immediately, as it is unlikely to be genuine and may be an attempted fraud.

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GOWLING WLG

Invoice

Alvarez & Marsal Canada Inc.
ATTN: Vicki J. Chan
Vice President
925 West Georgia Street
Suite 902, Cathedral Place
Vancouver BC V6C 3L2

August 19, 2024
INVOICE: 20326815

Our Matter: V53261 / 217991
RE: FANG, Kuang Wan

		GST (5.0%)	PST (7.0%)
Fees for Professional Services	\$1,234.00	\$61.70	\$86.38
Disbursements (Taxable)	5.55		
Disbursements (Non-Taxable)	<u>37.20</u>		
Total Disbursements	42.75	0.28	0.00
Total Fees and Disbursements	1,276.75		
Total Taxes	148.36	61.98	86.38
Total Invoice	1,425.11		
Please remit balance due:	In Canadian Dollars	\$1,425.11	

Important Notice: Please Read

Please make all payments by wire transfer or electronic funds transfer (EFT)

Our complete banking details are on the remittance copy (last page) of this invoice. If you have any questions, please contact payments.ca@gowlingwlg.com

Jonathan B. Ross

Signed for & on behalf of Gowling WLG (Canada) LLP

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August 19, 2024
INVOICE: 20326815

Alvarez & Marsal Canada Inc.
Our Matter: V53261
FANG, Kuang Wan

PROFESSIONAL SERVICES

Date	Hours	Timekeeper	Description
2024-01-02	0.20	Kathy Jiang	Email from J. Ross re title searches; conduct title searches on current and cancelled titles;
2024-01-02	0.40	Jonathan Ross	Request, review and deliver Land Title information re parcel to V. Chan;
2024-02-29	0.10	Jonathan Ross	Email from A. Tillman;
2024-05-30	0.20	Jonathan Ross	Correspondence from J. Bradshaw; correspondence to A. Tillman;
2024-06-05	0.20	Jonathan Ross	Correspondence from A. Tillman re. [REDACTED]
2024-06-10	0.10	Jonathan Ross	Email from A. Tillman re [REDACTED];
2024-06-12	0.50	Jonathan Ross	Conference with client and J. Bradshaw re next steps;
2024-06-13	0.20	Jonathan Ross	Correspondence to P. Law re service and materials;

Total Fees for Professional Services

\$1,234.00

DISBURSEMENTS

Taxable Costs

Minister of Finance - Taxable

\$5.55

Total Taxable Disbursements

\$5.55

Non-Taxable Costs

Minister of Finance - Agency

\$37.20

Total Non-Taxable Disbursements

\$37.20

Terms: payment due within 30 days of invoice date
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Errors and omissions excluded



August 19, 2024
INVOICE: 20326815

Remittance Copy

Client: 217991 Alvarez & Marsal Canada Inc.
Matter: V53261
RE: FANG, Kuang Wan
Amount Due: \$1,425.11 CAD

PAYMENT BY WIRE TRANSFER:

BENEFICIARY BANK: Canadian Imperial Bank of Commerce
BANK ADDRESS: 84 Bank Street, Ottawa, ON K1P 5N4
BANK NUMBER: 0010
TRANSIT NUMBER: 00186

BENEFICIARY ACCOUNT NAME: Gowling WLG (Canada) LLP
BENEFICIARY ADDRESS: 160 Elgin Street, Suite 2600, Ottawa, ON K1P 1C3
BENEFICIARY ACCOUNT NUMBER(S): CDN Account: 4102916
USD Account: 0221015

BBCC/ ROUTING NUMBER: CC001000186
ADDITIONAL MANDATORY INFO: Invoice number(s)/Payment details
If your bank does not accept the BBCC as part of the wire instructions, it must be included in the notes with the Additional Mandatory Information.

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BIC: PNBPU33NNYC
ABA:026005092

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PAYMENT BY CHEQUE:

REMIT TO: Gowling WLG (Canada) LLP
PO Box 466, STN D
Ottawa, ON K1P 1C3
Canada

Please return this page with your payment payable to Gowling WLG (Canada) LLP

PAYMENT BY Interac E-TRANSFER:

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No. S015937
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

BANK OF CHINA

PLAINTIFF/ JUDGMENT CREDITOR

AND:

XU CHAO FAN, also known as Hui Yat Fai; XU GAO JUN,
also known as Xu Juo Jun, Xu Guo Jun, Kit Sun Hui; Hui Kit
Shun Hui Kit Sun and Hui Kit Chun; and Others

DEFENDANTS/ JUDGMENT DEBTORS

AFFIDAVIT

GOWLING WLG (CANADA) LLP
Barristers and Solicitors
Suite 2300, 550 Burrard Street
Vancouver, BC V6C 2B5

Tel. No. 604.683.6498
Fax No. 604.683.3558

File No. V53261

MD/msh