



No. S2111109
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

Between:

PROSPERA CREDIT UNION

Petitioner

and:

1143924 B.C. LTD.
BUFFALO-GENTAI (ST. JOHNS)
INVESTMENTS LIMITED PARTNERSHIP
BUFFALO-GENTAI DEVELOPMENT LTD.
HONGYU TINA MU
YU YANG
GENTAI DEVELOPMENT CROP.
BUFFALO HOLDINGS INC.
WYJ 215 TRUST
CANADIAN WESTERN BANK

Respondents

APPLICATION RESPONSE

Application response of: Canadian Western Bank (the "Application Respondent")

THIS IS A RESPONSE TO the notice of application of The Bowra Group filed 18/JUL/2022.

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. Canadian Western Bank ("CWB") is a senior secured creditor of the Debtors as defined in the Receivership Order, as amended.
2. CWB holds, as security for loans to the Debtors, among other things, a first mortgage over the lands described in Part 2, paragraph 7 of the Receiver's Notice of Application.

Part 5: LEGAL BASIS

1. The Receivership Order, the Supreme Court Civil Rules of Court and the inherent jurisdiction of this Honourable Court.


Part 6: MATERIAL TO BE RELIED ON

1. The Receivership Order made January 27, 2022, as amended and restated on March 25, 2022;
2. The Receiver's First Report; and
3. Such further and other materials as counsel may advise.

The application respondent(s) estimate(s) that the application will take 40 minutes.

- The application respondent has filed in this proceeding a document that contains the application respondent's address for service.
- The application respondent has not filed in this proceeding a document that contains an address for service. The application respondent's ADDRESS FOR SERVICE is:

Date: 20/JUL/2022



Daniel D. Nugent lawyer for The Respondent,
Canadian Western Bank

THIS APPLICATION RESPONSE is filed by Daniel D. Nugent, of the firm of Richards Buell Sutton LLP, whose place of business and address for service is 700 - 401 West Georgia Street, Vancouver, BC V6B 5A1, Telephone 604.682.3664/direct line: 604-595-9917