



FORM 33 RULE 8-1(10))

No.: S-2111109  
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 CORP., BUFFALO HOLDINGS INC.,  
WJY 2015 TRUST and CANADIAN WESTERN BANK

RESPONDENTS

**APPLICATION RESPONSE**

**Application response of:** Prospera Credit Union (the “application respondent”)

THIS IS A RESPONSE TO the notice of application of The Bowra Group Inc. filed July 18, 2022.

**Part 1: ORDERS CONSENTED TO**

The application respondent consents to the granting of the orders set out in the following paragraphs of Part 1 of the notice of application on the following terms: ALL

**Part 2: ORDERS OPPOSED**

The application respondent opposes the granting of the orders set out in the following paragraphs of Part 1 of the notice of application: NONE

**Part 3: ORDERS ON WHICH NO POSITION IS TAKEN**

The application respondent takes no position on the granting of the orders set out in the following paragraphs of Part 1 of the notice of application: NONE

**Part 4: FACTUAL BASIS**

1. Prospera is a senior secured creditor of the Debtors (as defined in the receivership order) and holds, among other things, first mortgage security over the lands described in

paragraph 6 of the notice of application. Prospera supports the Receiver's application for the reasons articulated therein.

**Part 5: LEGAL BASIS**

1. The receivership order, the Rules and the inherent jurisdiction of the court.

**Part 6: MATERIAL TO BE RELIED ON**

1. Receivership order made January 27, 2022.
2. Amended and restated receivership order made March 25, 2022.
3. The Receiver's First Report.

The application respondent estimates that the application will take 20 minutes.

The application respondent has filed in this proceeding a document that contains the application respondent's address for service.

Date: July 19, 2022

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Signature of lawyer for application  
respondent(s)  
Scott H. Stephens Direct Line: 604-691-7521