



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 CORP.,
BUFFALO HOLDINGS INC.,
WJY 2015 TRUST,
CANADIAN WESTERN BANK**

RESPONDENTS

APPLICATION RESPONSE

Application response of: WJY 2015 TRUST ("this Respondent")

THIS IS A RESPONSE TO the Notice of Application of The Bowra Group Inc. filed October 12, 2022.

PART 1: ORDERS CONSENTED TO

The Application Respondent consents to the granting of none of the orders set out in Part 1 of the Notice of Application.

PART 2: ORDERS OPPOSED TO

The Application Respondent opposes the granting of none of the orders set out in 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 all of the orders set out in Part 1 of the Notice of Application.

PART 4: FACTUAL BASIS

1. The Receiver was appointed, pursuant to an Order of this Honourable Court to obtain third reading of the proposed development which is the subject of this application.
2. This Respondent took and takes the position that changes made to the development application by the Receiver were not authorized by the Order appointing it.
3. This Respondent objected to those changes at the time they were made.
4. This Respondent does not agree with the sales process employed by the Receiver which is more appropriate for a court ordered SISP than for the simple listing of a property for sale.
5. This Respondent objected to the sales process being employed by the Receiver.
6. Both of its objections were disregarded or overruled by the Receiver.
7. This Respondent says that the sales price being proposed by the Receiver, is a result of the Receiver changing the development and following an inappropriate process.

PART 5: LEGAL BASIS

1. This Respondent recognizes that the level of offers to be received are a result of the changes the Receiver made to the development proposed and to the sales process followed by the Receiver.
2. This Respondent takes no position on the approval of a sale, at this time in part because they do not know what the sales price will be if there are sealed bids.
3. This Respondent reserves the right to take whatever steps they deem necessary at a subsequent date, as a result of the conduct of the Receiver in altering the development plan and settling upon a sales process.

PART 6: MATERIAL TO BE RELIED ON

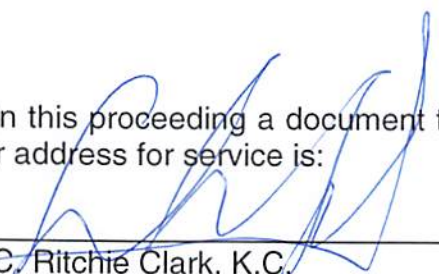
1. Such materials as counsel may advise.

This Respondent estimates that the application will take 15 minutes.

- This Respondent has filed in this proceeding a document that contains their address for service.

- This respondent has not filed in this proceeding a document that contains their address for service. Their address for service is:

DATE: October 18, 2022



H.C. Ritchie Clark, K.C.,
Lawyer for the Respondent, WJY 2015 Trust

THIS APPLICATION RESPONSE is filed by H.C. Ritchie Clark, K.C., of the firm Bridgehouse Law LLP, whose place of business and address for service is 900 – 900 West Hastings Street, Vancouver, BC, V6C 1E5. Telephone: 604-684-2550. Email: rclark@bridgehouselaw.ca