

Vancouver

02-Mar-23

REGISTRY

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 MNP Ltd. in its capacity as court-appointed receiver and manager (in such capacity, the “Receiver”) without security, of all of the assets, undertakings and property of 1143924 B.C Ltd., Buffalo-Gentai (St. Johns) Investment Limited Partnership and Buffalo-Gentai Development Ltd. (collectively, the “Debtors”) filed 24/FEB/2023.

**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: NONE

**Part 2: ORDERS OPPOSED**

The application respondent opposes the granting of the following 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 following orders set out in following paragraphs of Part 1 of the notice of application: ALL

**Part 4: FACTUAL BASIS**

1. N/A

**Part 5: LEGAL BASIS**

1. N/A

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

1. N/A

The application respondent estimates that the application will take 30 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: 28/FEB/2023



\_\_\_\_\_  
Signature of **Daniel D. Nugent**, lawyer for  
application respondent

THIS APPLICATION RESPONSE is 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.