



No. S2111109  
Vancouver Registry

FORM 33 RULE 8-1 (10))

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, XUEMEI HUANG

RESPONDENTS

### APPLICATION RESPONSE

**Application response of:** Xuemei Huang, (the "application respondent")

THIS IS A RESPONSE TO the notice of application of MNP Ltd. in its capacity as court-appointed receiver and manager of the assets, undertakings and property of 1143924 B.C. Ltd., Buffalo-Gentai (St. Johns) Investment Limited Partnership and Buffalo-Gentai Development Ltd. filed February 24, 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 on the following terms:

The application respondent consents to the net sale proceeds being paid into court to the credit of the action, as set out Schedule "A" to the notice of application.

#### Part 2: ORDERS OPPOSED

The application respondent does not oppose any of the orders sought 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 the balance of the orders set out in Part 1 of the notice of application.

**Part 4: FACTUAL BASIS**

1. The application respondent relies on the factual basis set out in her response to petition.

**Part 5: LEGAL BASIS**

1. Rules 10-1, 10-2 of the *Supreme Court Civil Rules*

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

1. The pleadings filed in this action
2. Affidavit #1 of Fan Yang

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: March 2, 2023

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Signature of Brent Desruisseaux, agent for Adele Sun, lawyer for the application respondent