



This is the 2nd affidavit
of Fan Yang in this case
and was made on July 10, 2025

No. H-250150
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

Peterson Investment Group Inc.

Petitioner

AND:

1076255 B. C. Ltd., Lightstone Development Ltd.,
1082463 B. C. Ltd., 1218548 B. C. Ltd., Gold Coast Industries Ltd.,
Xiao Song Zheng, Xiao Li, Ying Zheng Yu, Blueshore Leasing Ltd.,
Gould Leasing Ltd., Li Jiang, Bei Chen, Qing Su, Jide Liu,
686912366 Investment Ltd., Lei Bun Leung, Xiao Lian Zhang,
Johnson Rui Leung, Jon Kit Leung, Karen Leung,
Shun Feng Investment Ltd., Liwei Sun and 12503343 B. C. Ltd.


Respondents

AFFIDAVIT

I, Fan Yang, legal assistant, c/o Avid Law Corporation, 602 North Tower, 5811 Cooney Road,
Richmond, BC V6X 3M1 AFFIRM THAT:

1. I am a legal assistant employed by Avid Law Corporation, counsel to the respondents Liwei Sun and 1250334 B. C. Ltd. (the "Respondents"), and as such have personal knowledge of the facts and matters hereinafter deposed to, save and except where same are stated to be made on information and belief, and where so stated, I verily believe them to be true.
2. Attached to this affidavit as **Exhibit A** is a true copy of the deposit receipt issued by the Chloe project dated August 10, 2021 to Liwei Sun for the purchase of unit 405, strata lot 42 in the Chole development project located at 2096 West 47th Avenue, Vancouver, BC and a true copy of the Bank of Montreal cheque no. 908425 in the amount of \$104,000 from Hong Guo to Clare Wilson LLP in trust.

3. Attached to this affidavit as **Exhibit B** is a true copy of the deposit receipt dated August 10, 2021 issued to 1250334 B.C. Ltd and Liwei Sun for the purchase of units 27 (strata lot 309) and 48 (strata lot 411) in the Chole development project located at 2096 West 47th Avenue, Vancouver, BC and a true copy of the Bank of Montreal cheque no.908424 in the amount of \$145,000 from Hong Guo to Clare Wilson LLP in trust.
4. I was advised by Ms. Sun that Hong Guo is her mother.
5. I was advised by Ms. Liwei Sun that the deposits described in paragraphs 2 and 3 were never returned to her mother Hong Guo or to herself.

AFFIRMED BEFORE ME at the City of)
Richmond, British Columbia on)
10/Jul/2025.)
)
)
)
)

)
A commissioner for taking affidavits for)
British Columbia.)


FAN YANG

Nicole Tam
Avid Law Corporation
5811 Cooney Road, Suite 602
Richmond, B.C. V6x 3M1

This is Exhibit "A" referred to in the affidavit of Fan Yang sworn before me at Richmond in the Province of British Columbia this 10th day of July, 2021

A Commissioner for taking Affidavits for British Columbia
CHLOE
Deposit Receipt



SL: 42
Suite: 405

DEPOSIT RECEIPT

☒ INITIAL ☒ FIRST ☐ SECOND ☐ THIRD ☐ FOURTH

Between: 1076255 B.C. LTD. AND LIGHTSTONE DEVELOPMENT LTD. (the "Vendor")

And Liwei Sun (the "Purchaser")

Re: Offer to Purchase and Agreement of Purchase and Sale (the "Agreement") between the Vendor and the Purchaser

Dated July 14, 2021 with respect to the purchase and sale of Strata Lot # 42 (the "Strata Lot") (Suite # 405) in the development known as "Chloe" (the "Development") located at 2096 West 47th Avenue, Vancouver, British Columbia, currently legally described as: PID: 031-145-884 Lot 1 Block 2 District Lot 526 Group 1 New Westminster District Pk EPP91453.

DATED this 10 day of August, 2021.

Purchaser(s) is/are paying a Deposit in the amount of \$ 104,000 by (check one):

☐ Wire Transfer - Funds being wired from _____ (financial institution).
Note: When wiring funds, the wiring instructions must state the amount of the funds being wired, the project and the strata lot it relates to and which financial institution the funds are being wired from. Any other description of why the funds are being wired cannot be accepted and funds will be returned.

☒ Bank Draft - Name of Bank BMO

Liwei Sun
Purchaser(s) - Print Name

[Signature]
Purchaser's Signature

If the Deposit has been provided by a party other than the party named in the Agreement, the Third Party must also sign this Deposit Receipt and Direction as follows and provide additional data as required by FINTRAC:

I, _____, have provided the deposit funds, as noted above, and hereby authorize and direct Clark Wilson LLP and the Developer to apply these funds as a deposit to the above-noted Strata Lot.

Third Party's Signature

BMO Bank of Montreal • Banque de Montréal



OFFICIAL CHEQUE / CHÈQUE OFFICIEL

28TH AND DUNBAR
4445 DUNBAR ST.

VANCOUVER, B.C., CANADA V6S 2G4

908425

DATE 20210810
Y/A M/M D/J

Pay BANK
Payee CAD 104000.00

\$ 104,000.00

On Account of Hong Guo
En paiement de
TO THE ORDER OF / À L'ORDRE DE

701 For Bank of Montreal / pour la Banque de Montréal

Clark Wilson LLP
in Trust

[Signature]
Signing Officer / Signataire

[Signature]
Signing Officer / Signataire

06952001: 2721039084251 90

This is Exhibit "B" referred to in the affidavit of B. Fan Yang sworn before me at Richmond in the Province of British Columbia this 10th day of July, 2021

A Commissioner for taking Affidavits for British Columbia



SL: 27 + 48
Suite: 309 + 411

DEPOSIT RECEIPT

☒ INITIAL ☒ FIRST ☐ SECOND ☐ THIRD ☐ FOURTH

Between: 1076255 B.C. LTD. AND LIGHTSTONE DEVELOPMENT LTD. (the "Vendor")

And: 1250334 B.C. LTD. (Linei Sun) (the "Purchaser")

Re: Offer to Purchase and Agreement of Purchase and Sale (the "Agreement") between the Vendor and the Purchaser

Dated Aug 10 / July 14, 2021 with respect to the purchase and sale of Strata Lot # 27 + 48 (the "Strata Lot") (Suite # 309 + 411) in the development known as "Chloe" (the "Development") located at 2096 West 47th Avenue, Vancouver, British Columbia, currently legally described as: PID: 031-145-884 Lot 1 Block 2 District Lot 526 Group 1 New Westminster District Plan EPP91453.

DATED this 10 day of August, 2021.

Purchaser(s) is/are paying a Deposit In the amount of \$ 145,000 by (check one):

☐ Wire Transfer - Funds being wired from _____ (financial institution).
Note: When wiring funds, the wiring instructions must state the amount of the funds being wired, the project and the strata lot it relates to and which financial institution the funds are being wired from. Any other description of why the funds are being wired cannot be accepted and funds will be returned.

☒ Bank Draft - Name of Bank BMO

Unit 309 SL27 - \$69,000.00
Unit 411 SL48 - \$76,000.00
\$145,000.00

Linei Sun
Purchaser(s) - Print Name

[Signature]
Purchaser's Signature

If the Deposit has been provided by a party other than the party named in the Agreement, the Third Party must also sign this Deposit Receipt and Direction as follows and provide additional data as required by FINTRAC:

I, _____, have provided the deposit funds, as noted above, and hereby authorize and direct Clark Wilson LLP and the Developer to apply these funds as a deposit to the above-noted Strata Lot.

Third Party's Signature

BMO Bank of Montreal • Banque de Montréal
28TH AND DUNBAR
4445 DUNBAR ST.
VANCOUVER, B.C., CANADA V6S 2G4



OFFICIAL CHEQUE / CHÈQUE OFFICIEL
908424
DATE 20210810
Y/A M/M D/J

Pay
Payez

145,000.00 CAD 145,000.00 \$ 145,000.00

On Account of
En paiement de

Hong Guo

TO THE ORDER OF / À L'ORDRE DE

701

For Bank of Montreal / pour la Banque de Montréal

Clark Wilson LLP
in Trust

[Signature]
Signing Officer / Signataire

[Signature]
Signing Officer / Signataire

069520011 2721039084242 90