JUL 17 2025

NO. H250150 VANCOUVER REGISTRY



IN THE SUPREME COURT OF BRITISH COLUMBIA

**BETWEEN:** 

#### PETERSON INVESTMENT GROUP INC.

**PETITIONER** 

AND:

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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** 

## ORDER MADE AFTER APPLICATION (Sales Approval Order)

BEFORE THE HONOURABLE	WEDNESDAY, THE 16 <sup>TH</sup> DAY
MADAM JUSTICE FITPATRICK	OF JULY, 2025

ON THE APPLICATION of FTI Consulting Canada, Inc., in its capacity as court-appointed receiver and manager (the "Receiver"), without security, of the Property, as defined in the Receivership Order pronounced February 13, 2025, of 1076255 B.C. Ltd. ("107") and Lightstone Development Ltd. ("Lightstone", and together with 107, the "Debtors") coming on for hearing at Vancouver, British Columbia, on the 16<sup>th</sup> day of July, 2025; AND ON HEARING H. Lance Williams and Andew Butler, counsel for the Petitioner, and those other counsel listed on Schedule "A" hereto; AND UPON READING the material filed, including the First Report of the Receiver, dated July 4, 2025 (the "First Report") and the Confidential Supplement to First Report, dated July 4, 2025 (the "Confidential Report");

THIS COURT ORDERS AND DECLARES THAT:

#### Sales Approval Order

1. The Receiver is at liberty to obtain vesting and approval orders in the form of **Schedule**"B" attached hereto in respect of any of the strata lots (the "Units") located at the civic

addresses as set out in **Schedule** "C" attached hereto and legally described as set out therein, by way of desk order, without notice and without a hearing, by filing with the Court an executed Receiver's Sale Certificate (the "Certificate") in the form of the attached **Schedule** "D" which Certificate shall:

- (a) attach as an exhibit a true copy of the agreement of purchase and sale in respect of the subject Unit (or Units), including any relevant addendums;
- (b) confirm that the deposit for the sale has been paid to the Receiver and that the time for rescission in respect of the agreement of purchase and sale has passed; and
- (c) confirm that the gross purchase price in respect of the subject Unit (or Units) falls within the Price Range as defined in the Confidential Supplement.
- 2. Nothing herein shall prohibit the Receiver from seeking a hearing before the Court to seek the sale of any of the Units.

#### **Endorsement**

3. Endorsement of this Order by counsel appearing on this application other than the Receiver is hereby dispensed.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT:

Lawyer for FTI Consulting Canada, Inc.

McCarthy Tétrault LLP

(H. Lance Williams and Andrew Butler)

BY THE COURT

REGISTRAR

CHECKED

#### SCHEDULE "A"

#### LIST OF COUNSEL

Counsel Name	Party Represented	
Nerissa Yan and Alex Levine (Yan Muirhead LLP)	Lei Bun Leung, Xiao Lian Zhang, Johnson Rui Leung, Jon Kit Leung, Karen Leung	
Nicole Tam, Lawyer (agent for David Chen) (Avid Law Corporation)	Liwei Sun, 12503343 B.C. Ltd.	
Nathania Ng (Gall Legge Grant Zwack LLP)	Yihan Yang	
Ouran Li (OLPLC Metrotower Law Chambers)	Bei Chen, Qing Su, Jide Liu	
Agent, Ouran Li (OLPLC Metrotower Law Chambers)	Zi Hao Li	
Peter Rubin (Blake Cassels & Graydon LLP)	National Bank of Canada	
Bryan Gibbons (Lawson Lundell LLP)	Westmount West Services Inc.	
Arad Mojtahedi (DLA Piper (Canada) LLP)	Peterson Investment Group In.	

# SCHEDULE "B" VESTING ORDER

NO. H250150 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

## ORDER MADE AFTER APPLICATION (Approval and Vesting Order)

BEFORE THE HONOURABLE	) )	, THE DAY
JUSTICE	) )	OF,

ON THE APPLICATION of FTI Consulting Canada, Inc., in its capacity as court-appointed receiver and manager (the "Receiver"), without security, of the Property, as defined in the Receivership Order pronounced February 13, 2025, of 1076255 B.C. Ltd. ("107") and Lightstone Development Ltd. ("Lightstone", and together with 107, the "Debtors") without a hearing in accordance with the Order of Madam Justice Fitzpatrick pronounced July 16<sup>th</sup>, 2025 (the "Sales Approval Order"); AND UPON READING the material filed, including the Sales Approval Order;

THIS COURT ORDERS AND DECLARES THAT:

Ι.	The sale transaction (the "Transaction") contemplated by the Contract of Purchase ar
	Sale dated (the "Sale Agreement") between the Receiver and
	of (the "Purchaser"), as amended, a copy of
	which is attached to the Receiver's Certificate filed in support of this application and
	dated is hereby approved, and the Sale Agreement is commercially
	reasonable. The execution of the Sale Agreement by the Receiver is hereby authorized
	and approved, and the Receiver is hereby authorized and directed to take such
	additional steps and execute such additional documents as may be necessary or
	desirable for the completion of the Transaction and for the conveyance to the Purchase
	of the assets described in the Sale Agreement (the "Purchased Assets").

- 2. Upon delivery by the Receiver to the Purchaser of a certificate substantially in the form attached as Schedule "A" hereto (the "Receiver's Certificate"), all of the Debtor's right, title and interest in and to the Purchased Assets described in the Sale Agreement and listed in Schedule "B" hereto shall vest absolutely in the Purchaser in fee simple, free and clear of and from any and all security interests (whether contractual, statutory, or otherwise), hypothecs, mortgages, trusts or deemed trusts (whether contractual, statutory, or otherwise), liens, executions, levies, charges, or other financial or monetary claims, whether or not they have attached or been perfected, registered or filed and whether secured, unsecured or otherwise (collectively, the "Claims") including, without limiting the generality of the foregoing: (i) any encumbrances or charges created by the Order of this Court pronounced February 13, 2025 (ii) all charges, security interests or claims evidenced by registrations pursuant to the Personal Property Security Act of British Columbia or any other personal property registry system; and (iii) those Claims listed on Schedule "C" hereto (all of which are collectively referred to as the "Encumbrances", which term shall not include the permitted encumbrances, easements and restrictive covenants listed on **Schedule "D"** hereto), and, for greater certainty, this Court orders that all of the Encumbrances affecting or relating to the Purchased Assets are hereby expunged and discharged as against the Purchased Assets.
- 3. Upon presentation for registration in the Land Title Office for the Vancouver Land Title District of a certified copy of this Order, together with a letter from McCarthy Tétrault LLP, solicitors for the Receiver, authorizing registration of this Order, the British Columbia Registrar of Land Titles is hereby directed to:

- (a) enter the Purchaser as the owner of the Lands, as identified in Schedule "B", together with all buildings and other structures, facilities and improvements located thereon and fixtures, systems, interests, licenses, rights, covenants, restrictive covenants, commons, ways, profits, privileges, rights, easements and appurtenances to the said hereditaments belonging, or with the same or any part thereof, held or enjoyed or appurtenant thereto, in fee simple in respect of the Lands, and this Court declares that it has been proved to the satisfaction of the Court on investigation that the title of the Purchaser in and to the Lands is a good, safe holding and marketable title and directs the BC Registrar to register indefeasible title in favour of the Purchaser as aforesaid; and
- (b) having considered the interest of third parties, to discharge, release, delete and expunge from title to the Lands all of the registered Encumbrances except for those listed in Schedule "D".
- 4. For the purposes of determining the nature and priority of Claims, the net proceeds from the sale of the Purchased Assets shall stand in the place and stead of the Purchased Assets, and from and after the delivery of the Receiver's Certificate all Claims shall attach to the net proceeds from the sale of the Purchased Assets with the same priority as they had with respect to the Purchased Assets immediately prior to the sale, as if the Purchased Assets had not been sold and remained in the possession or control of the person having had possession or control immediately prior to the sale.
- 5. The Receiver is to file with the Court a copy of the Receiver's Certificate forthwith after delivery thereof.
- 6. Subject to the terms of the Sale Agreement, vacant possession of the Purchased Assets, including any real property, shall be delivered by the Receiver to the Purchaser at 12:00 noon on the Closing Date (as defined in the Sale Agreement), subject to the permitted encumbrances as set out in the Sale Agreement and listed on Schedule "D".
- 7. The Receiver, with the consent of the Purchaser, shall be at liberty to extend the Closing Date to such later date as those parties may agree without the necessity of a further Order of this Court.
- 8. Notwithstanding:

- (a) these proceedings;
- (b) any applications for a bankruptcy order in respect of the Debtor now or hereafter made pursuant to the *Bankruptcy and Insolvency Act* and any bankruptcy order issued pursuant to any such applications; and
- (c) any assignment in bankruptcy made by or in respect of the Debtor,

the vesting of the Purchased Assets in the Purchaser pursuant to this Order shall be binding on any trustee in bankruptcy that may be appointed in respect of the Debtor and shall not be void or voidable by creditors of the Debtor, nor shall it constitute or be deemed to be a transfer at undervalue, fraudulent preference, assignment, fraudulent conveyance or other reviewable transaction under the *Bankruptcy and Insolvency Act* or any other applicable federal or provincial legislation, nor shall it constitute oppressive or unfairly prejudicial conduct pursuant to any applicable federal or provincial legislation.

- 9. The Receiver or any other party have liberty to apply for such further or other directions or relief as may be necessary or desirable to give effect to this Order.
- 10. Endorsement of this Order by counsel other than counsel to the Receiver is hereby dispensed.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT:

Lawyer for FTI Consulting Canada, Inc. McCarthy Tétrault LLP (H. Lance Williams and Andrew Butler)

BY THE COURT	
2701077145	
REGISTRAR	

## SCHEDULE "A" RECEIVER'S CERTIFICATE

NO. H250150 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** 

#### **RECEIVER'S CERTIFICATE**

#### **RECITALS:**

A.	Pursuant to an Order of this Court (the "Court") pronounced February 13, 2025, FTI		
Con	sulting Canada, Inc., v	was appointed as receiver and m	anager (the " <b>Receiver</b> ") of the
Prop	perty (as defined in the	e Receivership Order).	
В.	Pursuant to an Ord	der of this Court pronounced	,, the Court approved
the o	offer to purchase, as a	mended, dated,	, (the <b>"Sale Agreement</b> ") between
the i	Receiver and	(the "Purchaser") and	d provided for the vesting in the
Purc	chaser and its assigne	es of the Debtor's right, title and	interest in and to the Purchased
Ass	ets, which vesting is to	be effective with respect to the	Purchased Assets upon the delivery
by ti	he Receiver to the Pu	chaser of a certificate confirming	(i) the payment by the Purchaser of
the	Purchase Price for the	Purchased Assets; and (ii) the T	ransaction has been completed to
the :	satisfaction of the Rec	eiver.	

C. Unless otherwise indicated herein, terms with initial capitals have the meanings set out in the Sale Agreement.

#### THE RECEIVER CERTIFIES the following:

1.	The Purchaser has paid and the Receiver has received the Purchase Price for the Purchased Assets payable on the Closing Date pursuant to the Sale Agreement.
2.	The Transaction has been completed to the satisfaction of the Receiver.
3.	This Certificate was delivered by the Receiver on[DATE].
	FTI Consulting Canada, Inc., in its capacity as receiver and manager of the Property (as defined in the Receivership Order), and not in its personal capacity
	Per:
	Name: Title:

# SCHEDULE "B" PURCHASED ASSETS

#● - • 47th Avenue West, Vancouver, BC V6M 0E5

PID: 032-299-●
Strata Lot ●
District Lot 526 Group 1 New Westminster District
Strata Plan EPS999●

Together with an interest in the common property in proportion to the unit entitlement of the strata lot as shown on Form V.

#### SCHEDULE "C"

#### ENCUMBRANCES TO BE DELETED/EXPUNGED FROM TITLE TO REAL PROP-ERTY

#### AS TO RESIDENTIAL UNITS

- 1. MORTGAGE CB292874
- 2. ASSIGNMENT OF RENTS CB292875
- 3. MORTGAGE CB293126
- 4. ASSIGNMENT OF RENTS CB293127
- 5. PRIORITY AGREEMENT CB294025
- 6. PRIORITY AGREEMENT CB294026
- 7. MORTGAGE CB294046
- 8. ASSIGNMENT OF RENTS CB294047
- 9. PRIORITY AGREEMENT CB294534
- 10. PRIORITY AGREEMENT CB294535
- 11. PRIORITY AGREEMENT CB294554
- 12. PRIORITY AGREEMENT CB294555
- 13. PRIORITY AGREEMENT CB1428817
- 14. PRIORITY AGREEMENT CB1428819
- 15. PRIORITY AGREEMENT CB1428820
- 16. PRIORITY AGREEMENT CB1428821
- 17. PRIORITY AGREEMENT CB1428823
- 18. PRIORITY AGREEMENT CB1428824
- 19. PRIORITY AGREEMENT CB1428825
- 20. PRIORITY AGREEMENT CB1428827
- 21. PRIORITY AGREEMENT CB1428828
- 22. CERTIFICATE OF PENDING LITIGATION CB1851253
- 23. OPTION TO PURCHASE CB1712550 (as to Strata Lot 19, Strata Lot 37, and Strata Lot 43 only)
- 24. MORTGAGE CB1714291 (as to Strata Lot 19, Strata Lot 37, and Strata Lot 43 only)
- 25. ASSIGNMENT OF RENTS CB1714292 (as to Strata Lot 19, Strata Lot 37, and Strata Lot 43 only)
- 26. MORTGAGE CB1535329 (as to Strata Lot 34 only)
- 27. ASSIGNMENT OF RENTS CB1535330 (as to Strata Lot 34 only)
- 28. MORTGAGE CB1650209 (as to Strata Lot 6, Strata Lot 7, and Strata Lot 8 only)
- 29. ASSIGNMENT OF RENTS CB1650210 (as to Strata Lot 6, Strata Lot 7, and Strata Lot 8 only)

#### AS TO COMMERCIAL UNITS

- 1. MORTGAGE CB292874
- 2. ASSIGNMENT OF RENTS CB292875
- 3. MORTGAGE CB293126
- 4. ASSIGNMENT OF RENTS CB293127
- 5. PRIORITY AGREEMENT CB294025
- 6. PRIORITY AGREEMENT CB294026
- 7. MORTGAGE CB294046
- 8. ASSIGNMENT OF RENTS CB294047

- 9. PRIORITY AGREEMENT CB294534
- 10. PRIORITY AGREEMENT CB294535
- 11. PRIORITY AGREEMENT CB294554
- 12. PRIORITY AGREEMENT CB294555
- 13. PRIORITY AGREEMENT CB1428818
- 14. PRIORITY AGREEMENT CB1428819
- 15. PRIORITY AGREEMENT CB1428820
- 16. PRIORITY AGREEMENT CB1428822
- 17. PRIORITY AGREEMENT CB1428823
- 18. PRIORITY AGREEMENT CB1428824
- 19. PRIORITY AGREEMENT CB1428826
- 20. PRIORITY AGREEMENT CB1428827
- 21. PRIORITY AGREEMENT CB1428828
- 22. MORTGAGE CB1535240
- 23. ASSIGNMENT OF RENTS CB1535241
- 24. CERTIFICATE OF PENDING LITIGATION CB1794125 (as to Strata Lot 6 only)
- 25. CERTIFICATE OF PENDING LITIGATION CB1856464
- 26. CERTIFICATE OF PENDING LITIGATION CB1902215 (as to Strata Lot 7 and Strata Lot 8 only)

#### **SCHEDULE "D"**

### PERMITTED ENCUMBRANCES, EASEMENTS AND RESTRICTIVE COVENANTS RELATED TO REAL PROPERTY

#### **AS TO RESIDENTIAL UNITS**

#### **LEGAL NOTATIONS**

- 1. NOTICE OF INTEREST, BUILDERS LIEN ACT (S.3(2)), SEE CA8321149
- 2. HERETO IS ANNEXED EASEMENT CB1428814 OVER LOT 1 PLAN EPP91453 EXCEPT AIR SPACE PLAN EPP133834

#### **CHARGES**

- 1. COVENANT CA8289457
- 2. STATUTORY RIGHT OF WAY CB251887
- 3. COVENANT CB251888
- 4. EASEMENT CB1428813
- 5. STATUTORY RIGHT OF WAY CB1428815
- 6. COVENANT CB1428816

#### AS TO COMMERCIAL UNITS

#### **LEGAL NOTATIONS**

- 1. NOTICE OF INTEREST, BUILDERS LIEN ACT (S.3(2)), SEE CA8321149 FILED 2020-07-24
- 2. HERETO IS ANNEXED EASEMENT CB1428813 OVER AIR SPACE PARCEL A AIR SPACE

#### **CHARGES**

- 1. COVENANT CA8289446
- 2. COVENANT CA8289447
- 3. EQUITABLE CHARGE CA8289448
- 4. COVENANT CA8289457
- 5. STATUTORY RIGHT OF WAY CB251887
- 6. COVENANT CB251888
- 7. EASEMENT CB1428814
- 8. STATUTORY RIGHT OF WAY CB1428815
- 9. COVENANT CB1428816

# SCHEDULE "C" LIST OF PARCEL IDENTIFICATION NUMBERS AND CIVIC ADDRESSES

Residential Units, located at 2096 47th Avenue West, Vancouver, BC, legally described as District Lot 526 Group 1 New Westminster District Strata Plan EPS9999			
1.	PID: 032-299-508	Strata Lot 3	
2.	PID: 032-299-524	Strata Lot 5	
3.	PID: 032-299-532	Strata Lot 6	
4.	PID: 032-299-541	Strata Lot 7	
5.	PID: 032-299-559	Strata Lot 8	
6.	PID: 032-299-567	Strata Lot 9	
7.	PID: 032-299-575	Strata Lot 10	
8.	PID: 032-299-605	Strata Lot 13	
9.	PID: 032-299-621	Strata Lot 15	
10.	PID: 032-299-648	Strata Lot 17	
11.	PID: 032-299-656	Strata Lot 18	
12.	PID: 032-299-664	Strata Lot 19	
13.	PID: 032-299-672	Strata Lot 20	
14.	PID: 032-299-729	Strata Lot 25	
15.	PID: 032-299-737	Strata Lot 26	
16.	PID: 032-299-745	Strata Lot 27	
17.	PID: 032-299-761	Strata Lot 29	
18.	PID: 032-299-800	Strata Lot 33	
19.	PID: 032-299-818	Strata Lot 34	
20.	PID: 032-299-842	Strata Lot 37	
21.	PID: 032-299-851	Strata Lot 38	
22.	PID: 032-299-869	Strata Lot 39	

Residential Units, located at 2096 47 <sup>th</sup> Avenue West, Vancouver, BC, legally described as District Lot 526 Group 1 New Westminster District Strata Plan EPS9999			
23.	PID: 032-299-907	Strata Lot 43	
24.	PID: 032-299-931	Strata Lot 46	

		at the civic addresses set w Westminster District St	out below, legally described as rata Plan EPS9998
1. PID: 032-299-958		Strata Lot 1	2092 47th Avenue West, Vancouver, BC
2.	PID: 032-299-966	Strata Lot 2	2094 47th Avenue West, Vancouver, BC
3.	PID: 032-299-974	Strata Lot 3	6306 East Boulevard, Vancouver, BC
4.	PID: 032-299-982	Strata Lot 4	6316 East Boulevard, Van- couver, BC
5.	PID: 032-299-991	Strata Lot 5	6326 East Boulevard, Van- couver, BC
6.	PID: 032-300-000	Strata Lot 6	6336 East Boulevard, Van- couver, BC
7.	PID: 032-300-018	Strata Lot 7	6346 East Boulevard, Van- couver, BC
8.	PID: 032-300-026	Strata Lot 8	6350 East Boulevard, Van- couver, BC
9.	PID: 032-300-034	Strata Lot 9	6370 East Boulevard, Van- couver, BC
10.	PID: 032-300-042	Strata Lot 10	6390 East Boulevard, Van- couver, BC
11.	PID: 032-300-051	ID: 032-300-051 Strata Lot 11 2099 48 Vancour	

# SCHEDULE "D" RECEIVER'S SALE CERTIFICATE

NO. H250150 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** 

#### RECEIVER'S SALE CERTIFICATE

- This Receiver's Sale Certificate is filed by FTI Consulting Canada, Inc. in its capacity as the receiver-manager (the "Receiver") without security, of the Property (as defined in the Receivership Order pronounced February 13, 2025) of 1076255 B.C. Ltd. and Lightstone Development Ltd.
- 2. Attached hereto as Exhibit "A" is a true copy of the Offer to Purchase (the "Agreement"), and all relevant addendums, relating to the following unit in the subject development (the "Development"), which is the subject of these proceedings and particulars of which are as follows.

Municipal Unit	Legal Unit	Parking Legal Unit	Purchaser	Purchase Price	Anticipated Closing Date

The Agreement has been accepted by the Receiver.
 The deposit for the above sale, as set out in the Agreement, has been paid by the intended purchaser to the Receiver, and the time for rescission of the Agreement has passed.
 The Receiver confirms that the gross purchase price in the Agreement falls within the Price Range as defined in the Confidential Supplement to the First Report of the Receiver, dated [date], 2025 and sealed pursuant to the Order of the Honourable Justice \_\_\_\_\_\_ on [date], 2025.
 FTI Consulting Canada, Inc., in its capacity as receiver and manager of the Property (as defined in the Receivership Order), and not in its personal capacity

Name: Title:

Per: \_\_\_\_\_

# EXHIBIT "A" ACCEPTED OFFER TO PURCHASE

#### NO. H250150 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** 

#### ORDER MADE AFTER APPLICATION

McCarthy Tétrault LLP Suite 2400, 745 Thurlow Street Vancouver, BC V6E 0C5 Phone: (604) 643-7100 Fax: (604) 643-7900

Attention: H. Lance Williams and Andrew Butler Email: lwilliams@mccarthy.ca / abutler@mccarthy.ca

\*\*FILING AGENT: HL LITIGATION\*\*