

FORCE FILED

No. S-258449  
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C.  
1985, C. c-36, AS AMENDED

AND



IN THE MATTER OF SQUARE NINE KING GEORGE DEVELOPMENT LTD. and  
SQUARE NINE BUILDERS INC.

**NOTICE OF APPLICATION**

Name of applicant: FTI Consulting Canada Inc., in its capacity as Court-appointed  
Monitor of the Petitioners (in that capacity, the "**Monitor**")

To: the service list, attached hereto as **Schedule "A"**

TAKE NOTICE that an application will be made by the applicant to the Honourable Justice Walker at the courthouse at 800 Smithe Street, Vancouver, British Columbia on **15/JAN/2026** at **9:15 a.m.** for the orders set out in Part 1 below.

The applicant estimates that the application will take 15 minutes.

This matter is not within the jurisdiction of an associate judge. Justice Walker is seized of this matter.

**Part 1: ORDER SOUGHT**

1. An order, substantially in the form attached hereto as **Schedule "B"** (the "**Rectification Order**") granting the following relief:
  - (a) a declaration that Strata Plan EPS11017 of Lot 1, Section 34, Block 5 North, Range 2 West, New Westminster District, Plan EPP87598 (the "**Strata Plan**") contains an error within the meaning of s. 14.12 of the *Strata Property Regulation*, B.C. Reg 43/2000 [**Regulation**] being that the "**Outdoor Kids Play Area**" (as shown on Page 7 of the Strata Plan) is classified as common property, rather than limited common property for exclusive use of Strata Lot 5 Section 34 Block 5 North Range 2 West New Westminster District Strata Plan EPS11017 (the "**Error**"); and

- (b) directing the Registrar of Land Titles, pursuant to s. 14.12 of the *Regulation*, to correct the Error in the Strata Plan.
2. Such further and other relief as counsel may advise and this Court may allow.

## **Part 2: FACTUAL BASIS**

1. Square Nine King George Development Ltd. ("**Square Nine King George**") and Square Nine Builders Inc. ("**Square Nine Builders**", and together with Square Nine King George, the "**Petitioners**") are companies in the Square Nine group of companies, a real estate development group focused on concrete high-rises, townhomes and investment properties.
2. Square Nine King George is the developer of the Belvedere, a completed 275-unit high-rise mixed-use tower, located at 9675 King George Boulevard, Surrey, British Columbia (the "**Belvedere**").
3. Pursuant to the Initial Order of the Supreme Court of British Columbia made on November 13, 2025 and entered on November 14, 2025, the Petitioners were granted protection under the CCAA, and FTI Consulting Canada Inc. was appointed monitor (in such capacity, the "**Monitor**").
4. On November 20, 2025, the Court granted the Amended and Restated Initial Order ("**ARIO**") which, among other things:
  - (a) extended the Stay Period to December 2, 2025; and
  - (b) empowered the Monitor with certain additional powers to act in respect of the property and business of the Petitioners, effectively akin to a receiver.
5. On December 2, 2025, the Court granted the Second Amended and Restated Initial Order ("**Second ARIO**") which, among other things, extended the Stay Period to January 31, 2026.

### **Background**

6. As discussed in the notice of application seeking an approval and vesting order, amongst other relief, heard on the same day as this Application (the "**AVO Application**"), the Monitor is seeking this Court's approval for a sale of five commercial units owned by Square Nine King George in the Belvedere.
7. This application is concerned with one of those units, specifically: PID: 032-420-269; Strata Lot 5 Section 34 Block 5 North Range 2 West New Westminster District Strata Plan EPS11017 ("**Strata Lot 5**").

8. Strata Lot 5 is currently leased out to 1422025 BC Ltd., doing business as Kinderbees Early Learning Centre ("**Kinderbees**"), pursuant to a lease agreement between Square Nine King George and Kinderbees dated July 31, 2024 (the "**Lease**"). The term of the Lease is ten years. The Lease provides that the permitted use of the property is for "childcare and related uses only".
9. The Outdoor Kids Play Area was included in the Lease.
10. On or about January 6, 2025, the Monitor became aware of an issue with the Strata Plan as it relates to the Outdoor Kids Play Area. Specifically, the Monitor became aware of a letter sent on behalf of the strata corporation associated with the Belvedere, The Owners, Strata Plan EPS11017 (the "**Strata Corporation**"), that was sent to Kinderbees and Square Nine King George on December 5, 2025 (the "**Strata Corporation's Letter**").
11. The Strata Corporation's Letter states that the Outdoor Kids Play Area is the common property of the strata and that Square Nine King George and Kinderbees have no right to exclusively use or alter the space without the approval of the Strata Corporation. As such, the Strata Corporation alleged the construction of a playground on the Outdoor Kids Play Area by Kinderbees violated the bylaws of the Strata Corporation. The Strata Corporation noted its entitlement to fine or remove the playground from the property. However, the Strata Corporation's Letter set out certain conditions wherein the Strata Corporation would be willing to approve the necessary alterations for the playground, including providing an indemnity to the Strata Corporation.
12. The Monitor and its counsel have reviewed the Strata Plan and the Monitor is of the opinion that the Strata Corporation is correct that the Strata Plan classifies the Outdoor Kids Play Area as common property.
13. Since becoming aware of this letter, the Monitor and Monitor's counsel have been in communications with the Strata Corporation to attempt to resolve this issue. There are concerns that if this is not resolved, it could impact the closing of the transaction contemplated in the AVO Application.
14. However, based on a review of the documents surrounding the Strata Plan, it appears that the classification of the Outdoor Kids Play Area as common property was an error, and instead it should have been listed as limited common property.

### **The Disclosure Statement**

15. Pursuant to s. 14 of the *Real Estate Development Marketing Act*, S.B.C. 2004, c. 41 [**REDMA**], developers of multi-unit development properties are required to file

disclosure statements before marketing units. A disclosure statement contains certain information about that particular development.

16. The disclosure statement for the Belvedere, dated March 11, 2021 (the “**Initial Disclosure Statement**”) includes a list at section 3.3(b) of what property is included in the common property of the Belvedere. It does not include the Outdoor Kids Play Area.

17. Section 3.4 of the Initial Disclosure Statement includes a list of what property is included in the limited common property of the Belvedere. At section 3.4(b), it states:

(b) The Developer will designate the following as Limited Common Property for the benefit of the applicable Strata Lot(s) on the Strata Plan:

(i) patios and balconies adjacent to a particular Strata Lot as shown on the Strata Plan; and

(ii) outdoor kids play area that will be attached as limited common property to one of the commercial strata lots (strata lot 5) that will be used as day care.

[emphasis added.]

18. Therefore, the body of the Initial Disclosure Statement clearly states that the Outdoor Kids Play Area is intended to be limited common property.

19. However, the preliminary strata plan contained in the Initial Disclosure Statement matches the Strata Plan as it also classifies the Outdoor Kids Play Area as common property.

### **Zoning Approval Process**

20. As part of the zoning approval process for the Belvedere, the City of Surrey (“**Surrey**”) imposed a number of conditions on the development. One of these conditions was that the Belvedere must permanently have a child care center located within it. Pursuant to this obligation, a covenant in favor of Surrey was filed in the land title office requiring that one of the commercial units in Belvedere be used as a dedicated child care center (the “**Covenant**”).

21. The zoning amending bylaw for the Belvedere adopted by Surrey on June 15, 2020 states that the Belvedere’s “child care centers shall be located on the lot such that these centers have direct access to an open space and play area within the lot”: City of Surrey, Bylaw No. 19681 (the “**Zoning Bylaw**”).

22. Further, the development plans included in the Planning and Development Report from the City of Surrey, dated September 17, 2018 and attached as Appendix "D" to the Staff Report to Council, "Additional Planning Comments" (the "**Staff Report**") show the Outdoor Kids Play Area outside of Strata Lot 5 in the same configuration as what appears on the Strata Plan. The Staff Report notes at page 7 that the Outdoor Kids Play Area will "serve the child care centre during operating hours".

### **Part 3: LEGAL BASIS**

23. The Petitioner will rely on:
- (a) the *Regulation*;
  - (b) the *Strata Property Act*, S.B.C. 1998, c. 43;
  - (c) the *CCAA*, in particular s. 11;
  - (d) the *Supreme Court Civil Rules*, B.C. Reg. 168/2009 [**Rules**], in particular R. 8-1 and 13-1; and
  - (e) the inherent and equitable jurisdiction of this Court.
24. Section 14.12 of the *Regulation* permits an error, defect, or omission in a strata plan to be corrected. Section 14.12 provides:

#### **Correction of errors**

**14.12 (1)** In this section:

"**error**" means any erroneous measurement or error, defect or omission in a registered strata plan;

"**registered strata plan**" includes any document, deposited in the land title office, that

- (a) is referred to in section 245 (a) or (b) of the Act,
- (b) forms part of a strata plan under the *Condominium Act*, R.S.B.C. 1996, c. 64 or a former Act, or
- (c) amends or replaces a document referred to in paragraph (a) or (b).

(2) If it appears to the registrar that there is an error in any registered strata plan, the registrar may give notice or direct that notice be given to any person, in the manner and within the time determined by the registrar, and the registrar, after considering submissions, if any, and examining the evidence, may correct the error.

25. This Court has jurisdiction to address an issue posed by s. 14.12 and make a declaration determining rights under the section, and, if the Court determines there is such an error that should be rectified, pronounce an order directing the registrar to correct the record. The Court's jurisdiction to do so is based on its equitable jurisdiction to rectify documents.

***Chow v. The Owners, Strata Plan NW 3243, 2017 BCCA 28 at para. 24.***  
***Baker v. The Owners, Strata Plan KAS 2750, 2022 BCSC 1449 at para. 15.***

26. Rectification is available when by mistake a legal instrument does not accord with the true agreement it was intended to record.

***Baker at para. 17, citing Canada (Attorney General) v. Fairmont Hotels Inc., 2016 SCC 56 at para. 12.***

27. The doctrine of rectification applies equally to "unilateral" instruments such as resolutions, and the focus of the test is whether "the parties who signed the document in question can show they had a definite and ascertainable intention when they signed, but that because of a mistake, the document failed to reflect that intention".

***Baker at para. 18, citing 5551928 Manitoba Ltd. v. Canada (Attorney General), 2019 BCCA 376 at para. 32.***

28. Rectification is an equitable remedy and a court may refuse to grant it when it would prejudice the rights of an innocent third party who has actually relied and acted upon the flawed document.

***Baker at para. 19.***

29. This Court has previously rectified misclassifications of property contained in strata plans. In *Chow v. The Owners, Strata Plan NW 3243*, this Court declared that seven parking stalls in a strata complex were misclassified as limited common property and directed the registrar of titles to correct the strata plan so that the seven parking stalls would be reclassified as common property.

***Chow v. The Owners, Strata Plan NW 3243, 2017 BCSC 2331 [Chow BCSC] at paras. 44–45.***

30. Similarly, in *Baker v. The Owners, Strata Plan KAS 2750*, this Court declared that a strata plan contained an error because a retaining wall had not been listed as

common property and directed the registrar of titles to correct the strata plan so that the wall was listed as common property.

***Baker at para. 102.***

31. In *Chow*, the Court listed the following as what it considered when determining an error existed in a strata plan:
- (a) an affidavit from the land surveyor deposing that they made such an error;
  - (b) the disclosure statement and surrounding evidence;
  - (c) the minutes of the city council meeting at which the architect made representations to council;
  - (d) the city bylaw in effect at the time, governing the number of required visitor parking spaces;
  - (e) the evidence of the developer, through a letter from counsel, that it intended to comply with its legal obligations; and
  - (f) the evidence concerning initial marketing and subsequent sale of the units.

***Chow BCSC at para. 16.***

32. In this case, similar factors as the above demonstrate that it was an error for the Outdoor Kids Play Area to be listed as common property.
33. First, the body of the Initial Disclosure Statement clearly states that the Outdoor Kids Play Area is limited common property connected to Strata Lot 5, and not common property.
34. While the preliminary strata plan contained in the Initial Disclosure Statement does list the Outdoor Kids Play Area as common property, this should be given less weight. The preliminary strata plan is prepared by the surveyor, while it is the developer who prepares the body of the disclosure statement. It is the objective intention of the signer of the instrument we are concerned with, which is the developer, Square Nine King George.

***Baker at para. 18, citing 5551928  
Manitoba Ltd. v. Canada (Attorney  
General), 2019 BCCA 376 at para. 32.***

35. Second, the Covenant requires that the Belvedere have a childcare center and the Zoning Bylaw requires that the childcare center have direct access to an open space and play area within the lot.

36. A limited common property designation will result in the Outdoor Kids Play Area being “designated for the exclusive use” of the owner of the Strata Lot. In turn, this will satisfy the intent of the Zoning Bylaw.
37. Further, this requirement accords with the requirement in s. 16 of the *Child Care Licensing Regulation* that generally requires 6 m<sup>2</sup> of outdoor play area for each child.

***Child Care Licensing Regulation, B.C.  
Reg. 332/2007, s. 16.***

38. Third, the Staff Report from the City of Surrey refers to “an outdoor play area that will serve the child care centre during operating hours”.
39. As such, the evidence demonstrates an objective intention of Square Nine King George to have the Outdoor Kids Play Area be limited common property as the childcare center was always envisioned to use the Outdoor Kids Play Area.
40. Accordingly, the Monitor respectfully requests that this Court grants an order directing the Registrar of Land Titles to correct the Error in the Strata Plan.

**Part 4: MATERIAL TO BE RELIED ON**

1. Fifth Report of the Monitor, to be filed;
2. Second Amended and Restated Initial Order, made December 2, 2025.

TO THE PERSONS RECEIVING THIS NOTICE OF APPLICATION: If you wish to respond to this Notice of Application, you must, within 5 business days after service of this Notice of Application or, if this application is brought under Rule 9-7, within 8 business days of service of this Notice of Application,

- (a) file an Application Response in Form 33,
- (b) file the original of every affidavit, and of every other document, that
  - (i) you intend to refer to at the hearing of this application, and
  - (ii) has not already been filed in the proceeding, and
- (c) serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:
  - (i) a copy of the filed Application Response;
  - (ii) a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on that person;
  - (iii) if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7(9).

Date: 12 JAN /2026

  
\_\_\_\_\_  
Signature of lawyer for filing party  
Jordan Schultz

To be completed by the court only:	
Order made	
<input type="checkbox"/>	in the terms requested in paragraphs _____ of Part 1 of this Notice of Application
<input type="checkbox"/>	with the following variations and additional terms:
_____	
_____	
_____	
Date:	_____
Signature of <input type="checkbox"/> Judge <input type="checkbox"/> Associate Judge	

\_\_\_\_\_  
**APPENDIX**

**THIS APPLICATION INVOLVES THE FOLLOWING:**

- discovery: comply with demand for documents
- discovery: production of additional documents
- other matters concerning document discovery
- extend oral discovery
- other matter concerning oral discovery
- amend pleadings
- add/change parties
- summary judgment
- summary trial
- service
- mediation
- adjournments
- proceedings at trial
- case plan orders: amend
- case plan orders: other
- experts
- none of the above

**Schedule "A"**

Service List

**SCHEDULE "A"**

No. S-258449  
VANCOUVER REGISTRY

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C.  
1985, c. C-36

AND

IN THE MATTER OF SQUARE NINE KING GEORGE DEVELOPMENT LTD. AND  
SQUARE NINE BUILDERS INC.

PETITIONERS

**SERVICE LIST**

As at December 30, 2025

Monitor's Website: <https://cfcanda.fticonsulting.com/SquareNine/>

<p>FTI Consulting Canada Inc. #1450 701 W. Georgia Street Vancouver BC V7Y 1B6</p> <p>Attention: Tom Powell</p> <p>Email: <a href="mailto:tom.powell@fticonsulting.com">tom.powell@fticonsulting.com</a> <a href="mailto:mike.clark@fticonsulting.com">mike.clark@fticonsulting.com</a> <a href="mailto:Longmai.Yan@fticonsulting.com">Longmai.Yan@fticonsulting.com</a></p>	<p>Dentons Canada LLP. 20<sup>th</sup> Floor, 250 Howe Street Vancouver, BC V6C 3R8</p> <p>Attention: Jordan Schultz Chloe Ducluzeau</p> <p>E-mail: <a href="mailto:jordan.schultz@dentons.com">jordan.schultz@dentons.com</a> <a href="mailto:chloe.ducluzeau@dentons.com">chloe.ducluzeau@dentons.com</a> <a href="mailto:chelsea.denton@dentons.com">chelsea.denton@dentons.com</a> <a href="mailto:nav.sidhu@dentons.com">nav.sidhu@dentons.com</a></p> <p><i>Counsel for the Monitor, FTI Consulting Canada Inc.</i></p>
<p>McEwan Cooper Kirkpatrick LLP 900-980 Howe Street Vancouver, BC V6Z 0C8</p> <p>Attention: William Stransky David Gruber</p> <p>Email: <a href="mailto:wstransky@mcewanpartners.com">wstransky@mcewanpartners.com</a> <a href="mailto:dgruber@mcewanpartners.com">dgruber@mcewanpartners.com</a> <a href="mailto:cron@mcewanpartners.com">cron@mcewanpartners.com</a></p> <p>Counsel for the Petitioners, Square Nine King George Development Ltd. And Square Nine Builders Inc.</p>	<p>Cassels Brock &amp; Blackwell LLP Suite 2200, RBC Place 885 West Georgia Street Vancouver, BC V6C 3E8</p> <p>Attention: Vicki Tickle Jeremy Bornstein</p> <p>Email: <a href="mailto:vtickle@cassels.com">vtickle@cassels.com</a> <a href="mailto:jbornstein@cassels.com">jbornstein@cassels.com</a></p> <p><i>Counsel for Cameron Stephens Mortgage Capital Ltd.</i></p>

<p>McCarthy Tétrault 745 Thurlow Street, Suite 2400 Vancouver BC, V6E 0C5, CA</p> <p>Attention: Ashley Bowron</p> <p>Email: <a href="mailto:abowron@mccarthy.ca">abowron@mccarthy.ca</a> <a href="mailto:acocks@mccarthy.ca">acocks@mccarthy.ca</a> <a href="mailto:kgriffin@mccarthy.ca">kgriffin@mccarthy.ca</a>;</p> <p><i>Counsel for C3 GP Ltd. and C3 Developments Limited Partnership</i></p>	<p>Department of Justice B.C. Regional Office 900 - 840 Howe Street Vancouver, BC V6Z 2S9</p> <p>Attention: Jessica Ko</p> <p>Email: <a href="mailto:Jessica.Ko@justice.gc.ca">Jessica.Ko@justice.gc.ca</a> <a href="mailto:Mariam.Assadi@justice.gc.ca">Mariam.Assadi@justice.gc.ca</a></p> <p><i>Counsel for the Canada Revenue Agency</i></p>
<p>Gowling WLG Bentall 5, #2300 – 550 Burrard St. Vancouver, BC V6C 0B3</p> <p>Attention: Amarit Bains</p> <p>Email: <a href="mailto:Amarit.Bains@gowlingwlg.com">Amarit.Bains@gowlingwlg.com</a> <a href="mailto:Jonathan.Ross@gowlingwlg.com">Jonathan.Ross@gowlingwlg.com</a></p> <p><i>Counsel for Pillar Capital Corp.</i></p>	<p>DWF (Ontario) LLP 800 – 123 Front Street West Toronto, ON M5J 2M3</p> <p>Attention: Robert K. Fischer</p> <p>Email: <a href="mailto:Robert.fischer@dwfgroup.com">Robert.fischer@dwfgroup.com</a> <a href="mailto:Meena.lally@dwfgroup.com">Meena.lally@dwfgroup.com</a></p> <p><i>Counsel for AMRN Holding Ltd. and 1137571 B.C. Ltd.</i></p>
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<p>Campbell Froh May &amp; Rice LLP #200 – 5611 Cooney Road, Richmond, BC V6X 3J6</p> <p>Attention: Frank Ju</p> <p>Email: <a href="mailto:fju@cfmrlaw.com">fju@cfmrlaw.com</a> <a href="mailto:tlaw@cfmrlaw.com">tlaw@cfmrlaw.com</a></p> <p><i>Counsel for Raymond Parmveer Singh Kaila, a creditor</i></p>	<p>LAT49 Builders Inc. Unit 2132, 4710 Kingsway, Burnaby , BC , V5H 4M2</p>
<p>AMRN Holding Ltd. 8516 115A Street Delta, BC V4C 5R8</p>	<p>1137571 B.C. Ltd. 650 - 1188 West Georgia Street Vancouver, BC V6E 4A2</p>
<p>Canada Revenue Agency Surrey National Verification and Collections Centre 9755 King George Boulevard Surrey BC V3T 5E1</p>	<p>Peterson Investment Group Inc. 1701 - 1166 Alberni Street Vancouver, BC V6E 3Z3</p>

Realtech Capital Group Inc. 1210-1030 West Georgia Street Vancouver, BC V6E 2Y3	CWB National Leasing Inc. 525 Buffalo Place Winnipeg, MB R3T 1L9
Desjardins Financial Security Life Assurance Company 401 W Georgia Street, Suite 1050 Vancouver, BC V6B 5A1	Canguard Mortgage Investment Corporation 1205 - 1055 Hastings Street W Vancouver, BC V6E 2E9
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## **EMAIL SERVICE LIST:**

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**Schedule "B"**

Draft Order

*(See Attached)*

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C.  
1985, C. c-36, AS AMENDED

AND

IN THE MATTER OF SQUARE NINE KING GEORGE DEVELOPMENT LTD. and  
SQUARE NINE BUILDERS INC.

**ORDER MADE AFTER APPLICATION**

	)		)	
	)		)	
BEFORE	)	THE HONOURABLE JUSTICE P.	)	15/JAN/2026
	)	WALKER	)	
	)		)	

**THE APPLICATION** of FTI Consulting Canada Inc., in its capacity as court-appointed monitor of Square Nine King George Development Ltd. and Square Nine Builders Inc. (in such capacity, the "**Monitor**"), coming on for hearing at Vancouver, British Columbia, on the 15th day of January, 2026; AND ON HEARING Jordan Schultz, counsel for the Petitioners, and those other counsel listed on **Schedule "A"** hereto; AND UPON READING the materials filed, including the Fifth Report of the Monitor filed January 12, 2026; AND pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended, the *Strata Property Regulation*, B.C. Reg 43/2000, the *British Columbia Supreme Court Civil Rules*, B.C. Reg. 168/2009 and the inherent jurisdiction of this Honourable Court;

THIS COURT ORDERS that:

1. The time for service of this Notice of Application and supporting materials is hereby abridged such that the Notice of Application is properly returnable today and service thereof on any interested party is hereby dispensed with.

2. Strata Plan EPS11017 of Lot 1, Section 34, Block 5 North, Range 2 West, New Westminster District Plan EPP87598 deposited in the Land Title Office on December 12, 2024 (the "**Strata Plan**"), contains an error within the meaning of s. 14.12 of the *Strata Property Regulation*, B.C. Reg 43/2000 [*Regulation*], being that the "Outdoor Kids Play Area" (as shown on Page 7 of the Strata Plan) is classified as common property, rather than limited common property for exclusive use of Strata Lot 5 Section 34 Block 5 North Range 2 West New Westminster District Strata Plan EPS11017 (the "**Error**").

3. The Monitor shall prepare an explanatory plan to correct the Error.

4. The Registrar of Land Titles is hereby directed pursuant to s. 14.12 of the *Regulation* to correct the Error in the Strata Plan if the Registrar is satisfied that the explanatory plan prepared by the Monitor is in registerable form and all other requirements have been met.

5. The Monitor 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.

6. Endorsement of this Order by counsel appearing other than counsel for the Monitor is hereby dismissed with.

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:

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Signature of Jordan Schultz  
Lawyer for the Monitor

By the Court.

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Registrar

**Schedule "A" – List of Counsel**

<b>Name of Counsel</b>	<b>Appearing For</b>