



IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF SECTION 179.1 (FORMERLY SECTION 152) OF THE *SECURITIES ACT*, RSBC 1996, C. 418

BETWEEN:

BRITISH COLUMBIA SECURITIES COMMISSION

PETITIONER

AND:

SIU MUI "DEBBIE" WONG
SIU KON "BONNIE" SOO
ORIGIN BUSINESS PARK INC. formerly known as
WHEATLAND INDUSTRIAL PARK INC.
1300302 ALBERTA INC.
D & E ARCTIC INVESTMENTS INC.
DEREK WAI GIT WONG
FARM CREDIT CANADA

RESPONDENTS

NOTICE OF APPLICATION

Name of Applicant: MNP Ltd., in its capacity as the Court-appointed receiver of certain assets, undertakings and properties of the Respondents and all proceeds therefrom (in such capacity, the "Receiver")

To: Service List attached hereto as **Schedule "A"**

TAKE NOTICE that an application will be made by the Applicant to the presiding judge at the Courthouse at 800 Smithe Street, in the City of Vancouver, in the Province of British Columbia on Wednesday, the 31st day of May, 2023 at 9:45 a.m. for the orders set out in Part 1 below.

Part 1: ORDERS SOUGHT

1. An Order (the "**Claims Process Order**"), substantially in the draft form attached hereto as **Schedule "B"**, setting forth the proposed claims process (the "**Claims Process**") to be administered by MNP Ltd. in its capacity as Receiver of the Property, as defined in the Second Amended and Restated Receivership Order granted in the within proceedings on June 29, 2022 (as amended, the "**Receivership Order**"). All capitalized terms not defined in this Notice of Application shall bear the same meaning as the capitalized terms found in the draft form of Claims Process Order.

2. An Order (the “**Removal Order**”), substantially in the draft form attached hereto as **Schedule “C”**, removing Derek Wai Git Wong and Farm Credit Canada as named Respondents to these proceedings, amending the style of proceedings accordingly, and dispensing with preparation and service of an Amended Petition and the terms of Rule 6-2(8) of the Supreme Court Civil Rules.
3. An Order (the “**Approval Order**”), substantially in the draft form attached hereto as **Schedule “D”**, approving the Receiver’s activities as set out in the Third Report, and approving the fees and disbursements of the Receiver, including the fees and disbursements of the Receiver’s legal counsel, Lawson Lundell LLP.

Part 2: FACTUAL BASIS

4. In 2016, the British Columbia Securities Commission (the “**Commission**”) found that the Respondents, Sui Mui “Debbie” Wong (“**Wong**”) and Siu Kon “Bonnie” Soo (“**Soo**”) committed fraud in connection with a land development and securities scheme undertaken by them, in relation to two real estate development projects in Alberta: 306 acres in Wheatland County (the “**Wheatland Lands**”), 158 acres in Rocky View County (the “**Rocky View #1 Lands**”).
5. As found by the Commission, Wong and Soo acquired the Wheatland and Rocky View #1 Lands in 2007 with the intention of developing and subdividing them, then selling the subdivided lots at a profit. The Wheatland Lands were acquired through Wheatland Industrial Park Inc. (now Origin Business Park Inc., “**Wheatland**”), a corporation formed by Wong and Soo. Wong and Soo acquired the Rocky View Lands through a company they controlled, and later sold the lands to 1300302 Alberta Inc. (“**1300302**”) and D&E Arctic Investments Inc. (“**D&E Arctic**”).
6. To raise money for the acquisition and development of the Wheatland Lands and the development of the Rocky View #1 Lands, Soo and Wong sold joint venture units to investors in each of the Wheatland Lands (the “**Wheatland JV**”), which were held in trust for investors, and the Rocky View #1 Lands (the “**Rocky View #1 JV**”), which were held by 1300302 and D&E Arctic as nominees for the investors.
7. In addition to the Wheatland Lands and Rocky View #1 Lands, Soo and Wong acquired further development lands in Rocky View (the “**Rocky View #2 Lands**”), which were also part of a joint venture (the “**Rocky View #2 JV**”, and, together with the Wheatland JV and the Rocky View #1 JV, the “**Alberta JVs**”) and held in trust for investors by 1305402 Alberta Inc. (“**1305402**”). The Alberta Court of King’s Bench directed a payment to the Receiver from the sale proceeds of the Rocky View #2 Lands in the amount of \$16,031.39 plus accrued proportionate interest in respect of Wong and Soo’s combined proportional interest held by 0774238 B.C. Ltd. (“**077**”) and D&C Atlantic Investments Inc. (“**D&C Atlantic**”).

8. Collectively, there are at least 134 investors in the Alberta JVs, who have lost approximately \$33 million as a result of their investments in those projects.
9. In early 2017, the Commission ordered various sanctions against Wong, Soo, 1300302 and D&E Arctic, arising from its findings of fraud, including sanctions under ss. 161(1)(g) and 162 of the *Securities Act*, totalling over \$15 million against each of Soo and Wong, \$2,785,000 against 1300302, and \$1,105,000 against D&E Arctic. The Sanctions Decision was registered with, and deemed to be a judgment of, this Court on March 3, 2017.
10. Before the Receiver was appointed, the Commission completed an investigation to locate the property owned or held by or on behalf of Wong, Soo, 1300302, and D&E Arctic. Among other things, the Commission determined that Wong and Soo's exigible assets included certain interests in real property and in numerous bank accounts, and various corporations and joint ventures. Investors also alleged a tracing remedy against various assets owned by Soo and Wong's family members and corporations controlled by them, including real property, in part because the money raised from investors were used to acquire such assets.
11. On October 3, 2019, the Commission sought and obtained an order in these proceedings under ss. 151 and 152 of the *Securities Act* appointing the Receiver to undertake the orderly investigation of assets, and recovery and distribution of funds to investors defrauded in connection with the Alberta JVs, and to evaluate all potential claims against the Respondents and fairly and efficiently distribute funds to investors.
12. The Receivership Order was amended twice to expand the undertaking, assets and property over which the Receiver was appointed. As set out more fully in the Receiver's Third Report, the Receiver has now completed all reasonable efforts to recover property within its mandate, and holds approximately \$2,253,575 as at April 30, 2023 for distribution to investors, subject to any costs and fees (including legal fees and disbursements) of the Receiver that may accrue between April 30, 2023 and the date of distribution.

Purpose of the Claims Process

13. The purpose of the Claims Process is to enable the Receiver to identify and determine the claims of persons who invested in the Alberta JVs, and to ensure the proper and timely administration of the Receivership Funds.

Overview of the Claims Process

14. The Claims Process is set forth in greater detail in the attached draft Claims Process Order.

15. By way of summary, the Receiver notes the following salient aspects of the draft Claims Process Order:
- (a) It provides notification provisions to provide notice of the current proceedings and the claims process;
 - (b) It provides a means of administering the claims process, directions on how a Claimant must complete and submit a Proof of Claim to the Receiver and when a Proof of Claim may be barred;
 - (c) It provides a means of adjudicating the Proof of Claims and a process for a Claimant to appeal a Notice of Disallowance issued by a Receiver; and
 - (d) It provides a distribution scheme of the Receivership Funds to all Proven Creditors.
 - (e) Draft versions of the Instruction Letter; Notice to Creditors, Proof of Claim, and Notice of Disallowance are attached for review as Schedules to the draft Claims Process Order.

Removal Order

16. Pursuant to an Order made on December 13, 2022, the Court approved a Property Purchase and Sale Agreement dated for reference November 10, 2022, between the Receiver and Ngai Woon Chow and authorized and directed the Receiver to complete the sale of certain lands (the “**120th Street Lands**”) in which Wong had an interest.
17. For the limited purpose of effecting the transfer of title to the 120th Street Lands to Ngai Woon Chow, the Court pronounced a further Order on December 13, 2022, directing that Derek Wai Git Wong and Farm Credit Canada be added as named respondents to the within proceedings.
18. The sale of the 120th Street Lands closed on January 17, 2023. The Receiver received the sale proceeds in respect of Ms. Wong’s one-quarter interest, and deposited same into the receivership trust account, and also filed the Receiver’s Certificate in respect of the sale on January 19, 2023.

Approval Order

19. By Order of the Court pronounced December 13, 2022, the activities of the Receiver from April 7, 2022 to October 31, 2022 were approved by the Court. These activities are summarized in the Receiver’s Second Report to the Court and included the following:
- (a) filing an application and obtaining an order to further amend the Receivership Order and to require certain funds to be remitted;
 - (b) filing applications in the Mareva Action and obtaining orders to vary the Mareva Order;

- (c) obtaining consent of the Commission to vary freeze orders;
 - (d) advising financial institutions of recent orders obtained and requesting payment of funds to the Receiver;
 - (e) issuing demand for information to the directors of 077 and D&C Atlantic and review materials provided in response;
 - (f) completing the sale of the 100 Avenue Lands;
20. The Receiver's activities from October 31, 2022 to November 21, 2022 are set out in detail in the Second Report.
21. The Receiver's activities from November 22, 2022 to the date of the Third Report are set out in detail in the Third Report, and included the following:
- (a) maintaining and updating the Service List and the Receiver's website for the receivership proceedings;
 - (b) receiving and responding to various creditor and stakeholder inquiries;
 - (c) reviewing additional information received from certain financial institutions in respect of funds received to date; and
 - (d) continuing to deposit funds held in trust in the receivership into Guaranteed Investment Certificates in order to earn interest income.
22. The Receiver's fees and administration costs incurred in this matter from November 1, 2022 to April 30, 2023 totalled \$34,224.25 (including applicable taxes), as summarized in Appendices B and C to the Receiver's Third Report.
23. The time and disbursements incurred by the Receiver in the course of its duties are fair and reasonable in a receivership of the nature described herein. In the Receiver's opinion, the cost of this receivership is comparable to receivership assignments of similar scale and complexity.
24. The hourly rates charged by the Receiver are consistent with the average hourly rates billed by the Receiver on its other engagements and, to the Receiver's knowledge, consistent with other insolvency firms of comparable size engaged on similar receivership matters.
25. The Receiver requests that the Court summarily approve the Receiver's fees incurred from November 1, 2022 to April 30, 2023.
26. The Receiver engaged Lawson Lundell LLP ("**Lawson**") as its independent legal counsel. The total fees of Lawson from November 1, 2022 to April 30, 2023, were \$51,195.95, inclusive of disbursements but not including applicable taxes, as summarized in Appendices D and E to the Receiver's Third Report.

27. The Receiver has reviewed the invoices rendered to it by Lawson and believes them to be reasonable and proper. The legal services provided were necessary for the Receiver to fulfill its obligations in the proceeding.
28. The Receiver requests that the Court summarily approve the legal fees and disbursements incurred from November 1, 2022 to April 30, 2023,

Part 3 LEGAL BASIS

Claims Process Order

29. This Court has the jurisdiction to grant the order sought, pursuant to its inherent jurisdiction, as contemplated by the Receivership Order, as follows:
 - (a) paragraph 37 provides that the Receiver may from time to time apply to this Court for advice and directions of the discharge of its powers and duties thereunder;
 - (b) the Receiver's powers and duties include the power, under s. 4(a) of the Receivership Order, to take possession of and exercise control over the Property, and any all receipts and disbursements arising out of or from the Property; and
 - (c) paragraph 14 requires the Receiver to hold all funds received or collected by it and pay such funds in accordance with the terms of the Receivership Order or any further order of the Court.
30. The stated intent of this receivership, as set out in the Petition filed by the Commission, was to "fairly and efficiently" recover funds for investors, which is consistent with the general goal of receiverships.

Computershare Trust Co. of Canada v. Cookstown Holdings Inc.,
2014 ONSC 685 at para. 13.

31. In light of this principle, the Receiver submits that the Receivership Funds should be pooled and distributed to all Proven Creditors *pro rata*, regardless of in which of the Alberta JVs any Proven Creditor invested. This is because the exercise of attempting to trace investor funds paid in relation to each of the Alberta JVs would be prohibitively time-consuming and expensive, if it is even possible.
32. Furthermore, the proposed Claims Process and distribution of the Receivership Funds is limited to persons who suffered losses as a result of investing in the Alberta JVs. This reflects the basis on which the Receiver was appointed, noting that the Receiver was appointed under an earlier version of the *Securities Act*.

33. Specifically, under s. 152(1) of the version of the *Securities Act* pursuant to which the Receiver was appointed, if, among other things, the Commission makes an order under s. 161 in respect of a person, the Commission may apply to the Court for the appointment of a receiver of all or any part of the property of the person, and the Court may appoint a receiver if it is satisfied that the appointment is in the best interests of, among others, the creditors of, or subscribers to, that person. In this case, the Court granted the Receivership Order on the basis that it was in the best interests of investors in the Alberta JVs to appoint the Receiver.
34. The intent of this receivership is to recover and distribute funds to persons who have suffered losses as a result of *Securities Act* contraventions and wrongful conduct (i.e. persons defined as “eligible applicants” under the *Securities Regulation*, being those persons who “suffered pecuniary loss as a direct result” of the Respondents’ contravention of the *Securities Act*. As such, it is just and appropriate to limit the Claims Process and distribution of funds to the Respondents’ investors.

Securities Act, RSBC 1996, c 418, ss. 15 and 179.1

Securities Regulation, BC Reg 196/97, Part 3

“*Bill 33, Securities Amendment Act*”, Legislative Assembly of British Columbia, Committee of the Whole House, 41-4, No 285 (29 October 2019) at 10338 (Hon. C. James).

35. The Claims Process is also limited to Claims of investors who are not a “Related Person” in reference to the Respondents, and specifically, excludes investors who: (a) are connected to Wong or Soo by blood relationship, marriage, common-law partnership or adoption, (b) control any of the corporate respondents through direct or indirect shareholdings, (c) are or were directors or officers of the corporate respondents, and (d) are connected by blood relationship, marriage, common-law partnership or adoption to persons in categories (b) and (c).
36. In the Receiver’s submission, it is neither just nor appropriate to distribute the limited Receivership Funds to persons who potentially benefited from, or participated in, the Respondents’ *Securities Act* contraventions and wrongful conduct, whether as relatives of Wong or Soo, or as controlling shareholders, directors, or officers of the corporate Respondents, or relatives of such controlling persons.
37. Furthermore, once the stay of proceedings under the Receivership Order is lifted, the Respondents’ ordinary creditors will be able to exercise all of their rights and remedies against the Respondents in the usual course. As such, it is appropriate that the Claims Process and subsequent distribution of Receivership Funds be directed at the investors alone, and not to all of the Respondents’ creditors.

38. On the foregoing basis, the Receiver respectfully submits that the Court ought to exercise its jurisdiction to grant the requested Claims Process Order.

Removal Order

39. As the sale of the 120th Street Lands has been completed, the limited purpose for which Derek Wai Git Wong and Farm Credit Canada were added as Respondents is now fulfilled and there is no reason to have those parties continue as Respondents in these proceedings.
40. As the Order adding Derek Wai Git Wong and Farm Credit Canada as Respondents included a waiver of the need to file and serve an Amended Petition under rule 6-2(8) of the Supreme Court Civil Rules, a similar waiver ought to be included in the Removal Order.

Approval Order

41. In support of the Approval Order, to approve the Receiver's activities and its fees and disbursements, including the legal fees and disbursements of Lawson in its capacity as the Receiver's counsel, the Receiver will rely on the terms of the Receivership Order.

Part 4: MATERIAL TO BE RELIED ON

42. The Receiver's First Report to the Court dated April 6, 2022;
43. The Second Amended and Restated Receivership Order granted on June 29, 2022;
44. The Receiver's Second Report to the Court dated November 22, 2022;
45. The Receiver's Third Report to the Court, dated May 8, 2023, and filed concurrently herewith;
46. The Affidavit #9 of Patty Wood sworn herein on May 8, 2023;
47. The Affidavit #3 of William L. Roberts sworn herein on May 16, 2023; and
48. Such further and other material as counsel may advise and this Honourable Court may permit.

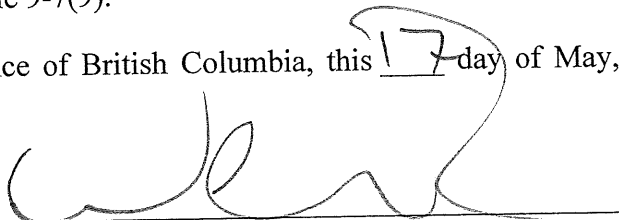
The Applicant estimates that the application will take 60 minutes.

- This matter is within the jurisdiction of a Master.
- This matter is not within the jurisdiction of a Master.

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 after service of this Notice of Application.

- (a) file an Application Response in Form 33,
- (b) file the original of every affidavit, and 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).

Dated at the City of Vancouver, in the Province of British Columbia, this 17 day of May, 2023.



Lawson Lundell LLP
Solicitors for the Applicant

This Notice of Application is filed by William Roberts, of the law firm of Lawson Lundell LLP, whose place of business and address for delivery is 1600 – 925 West Georgia Street, Vancouver, British Columbia, V6C 3L2, e-mail address: wroberts@lawsonlundell.com; telephone number: 604-685-3456.

Schedule "A"
SERVICE LIST

<p>Counsel for the Receiver:</p> <p>William Roberts Lawson Lundell LLP 1600 – 925 West Georgia Street, Vancouver, B.C., V6C 3L2 Telephone: (604) 631-9163 Email: wroberts@lawsonlundell.com</p>	<p>Receiver:</p> <p>Patty Wood MNP Ltd. Suite 2200, MNP Tower 1021 West Hastings Street Vancouver, BC V6E 0C3 Telephone: (604) 685-8408 Email: patty.wood@mnp.ca</p>
Petitioner	
<p>Counsel for the Petitioner: British Columbia Securities Commission</p> <p>William Roberts Lawson Lundell LLP 1600 – 925 West Georgia Street, Vancouver, B.C., V6C 3L2 Telephone: (604) 631-9163 Email: wroberts@lawsonlundell.com</p>	
Respondents	
<p>Siu Mui "Debbie" Wong</p> <p>16863 -58A Avenue Surrey, BC V3S8P1 Email: debbie16863@hotmail.com</p>	<p>Siu Kon "Bonnie" Soo</p> <p>3311 Barmond Avenue Richmond, BC V7E 1A1 Email: siukonsoo@gmail.com</p>
<p>1300302 Alberta Inc. 1101, 3961 – 52nd Avenue NE Calgary, AB T3J 0J7</p>	<p>D & E Arctic Investments Inc. c/o Debbie Wong 16863 58A Avenue Surrey, BC V3S 8P1</p>
<p>Origin Business Park, formerly known as Wheatland Industrial Park Inc. 1500, 222 – 3rd Avenue SW Calgary, AB T2P 0B4</p>	
Soo + Wong Companies	
<p>1342565 Alberta Inc. c/o Austin Wong in his capacity as Director of 1342565 Alberta Inc. 56 – 6747 203 Street Langley, BC V2Y 3B5</p>	<p>D & C Atlantic Investments Inc c/o Debbie Wong, in her capacity as a senior officer of D & C Atlantic Investments Inc. 16863 -58A Avenue Surrey, BC V3S8P1 Email: debbie16863@hotmail.com</p>

<p>0793751 BC Ltd. c/o Its Registered Office 16863 58A Avenue Surrey, BC V3S 8P1</p>	<p>0765306 B.C. Ltd. c/o Registered Office 16863 – 58A Avenue Surrey, BC V3S 8P1</p> <p>(DISSOLVED)</p> <p>CC:</p> <p>Colleen Soo in her capacity as Director of 0765306 B.C. Ltd. 3311 Barmond Avenue Richmond, BC V7E 1A1</p>
<p>1376472 Alberta Ltd. c/o Debbie Wong, in her capacity as a senior officer of 1376472 Alberta Ltd. 16863 -58A Avenue Surrey, BC V3S8P1 Email: debbie16863@hotmail.com</p>	<p>0879932 B.C. Ltd. c/o Its Registered Office 16863 58A Avenue Surrey, BC V3S 8P1</p>
<p>0790333 B.C. Ltd. c/o Its Registered Office Suite 205, 15240 – 56 Avenue Surrey, BC V3S 5K7</p> <p>(STRUCK)</p> <p>CC:</p> <p>Justin John Wing Soo in his capacity as Director of 0790333 B.C. Ltd. 3311 Barmond Avenue Richmond, BC V7E 1A1</p>	<p>0745188 B.C. Ltd. c/o Registered Office 205, 15240 – 56th Avenue Surrey, BC V3S 5K7</p> <p>(DISSOLVED)</p> <p>CC:</p> <p>Justin Soo in his capacity as Director of 0745188 B.C. Ltd. 3311 Barmond Avenue Richmond, BC V7E 1A1</p>
<p>0774238 B.C. Ltd. c/o Its Registered Office 16863 58A Avenue Surrey, BC V3S 8P1</p>	<p>1192657 Alberta Ltd. c/o Austin Wong in his capacity as Director of 1192657 Alberta Inc. 56 – 6747 203 Street Langley, BC V2Y 3B5</p>
<p>1342558 Alberta Inc. c/o Registered Office 1101, 3961 52 Avenue NE Calgary, AB T3J 0J7</p> <p>1342558 Alberta Inc. c/o Austin Wong in his capacity as Director of 1342558 Alberta Inc. 56 – 6747 203 Street Langley, BC V2Y 3B5</p>	<p>New City Enterprises Ltd. c/o Its Registered Office 501 – 1195 West Broadway Vancouver, BC V6H 3X5</p>

Non-Respondents (Joint Owners/Chargeholders)		
<p>Gilbert Wei Hung Wong c/o Austin Wong and Derek Wong, Executors of the Will of Wai Hung Wong, Deceased</p> <p>c/o Lindsay Kenney LLP Suite 1800, 401 West Georgia Street Vancouver, B.C. V6B 5A1 <u>Attention:</u> J. Reilly Pollard Email: RPollard@lklaw.ca</p>	<p>Kwok Kie Soo 3311 Barmond Avenue Richmond, BC V7E 1A1 Email: kwokiesoo@gmail.com</p>	
<p>Chen Liang Tao and Jae Wan Chow Ngai Fung Chow and Sau Lan Chow Danny Chow, Executor of the Will of Ngai Mo Chow, Deceased c/o Edwin Soon Law Office 609 – 938 Howe Street Vancouver, B.C. V6Z 1N9</p>	<p>Ngai Woon Chow Kwan Chyiu Chow (Deceased) South Town Enterprises Ltd. c/o Lana K.L. Li Kornfeld LLP 1100 One Bentall Centre 505 Burrard Street, Box 11 Vancouver, BC V7X 1M5</p>	
<p>Derek Wai Git Wong #18 – 17555 57A Avenue Surrey, BC V3S 7V2 Email: derek_van97@hotmail.com</p>	<p>Farm Credit Canada Adnan Habib Erin Stewart, Paralegal Baker Newby LLP 200 – 2955 Gladwin Road Abbotsford, BC V2T 5T4 Email: AHabib@bakernewby.com ESTewart@bakernewby.com</p>	
<p>His Majesty the King Right of Canada, as Represented by the Attorney General of Canada c/o Department of Justice 900 – 840 Howe Street Vancouver, BC V6Z 2W9 Email: gordon.carscadden@justice.gc.ca</p>		
Non-Respondents (Investor Groups)		
Action No.	Plaintiffs	Counsel
1401-10536 (ABQB)	DYMI Investments Ltd.	Michael Bokhaut Stones Carbert Waite LLP 200 Encor Place, 645 – 7 th Avenue SW Calgary, AB T2P 4G8 Email: bokhaut@carbertwaite.com
1801-07295 (ABQB)	1305402 Alberta Inc.	c/o Registered Office 1101, 3961 52 Avenue NE Calgary, AB T3J 0J7

		1305402 Albert Inc., c/o Kwok Kie Soo, in his capacity as Director of 1305402 Alberta Inc. 3311 Barmond Avenue Richmond, BC V7E 1A1 Email: kwokiesoo@gmail.com
S-134693	1734454 Ontario Ltd. (Ken Chan) 2125876 Ontario Ltd. (King Luen Yeung) 2125875 Ontario Ltd. and Yen Chia Yeung Elaine Cho and Mud Yau Cho 0795641 B.C. Ltd. (Tom Wong) 0795641 B.C. Ltd. (Larry Yee) 0795641 B.C. Ltd. (Simon So) Heng Sheng Development Co. Ltd. (Hank Yung and Patrick Tong) 0795213 B.C. Ltd. (Jonathan Ng) 0776137 B.C. Ltd. (Ai Hong "Ivy" He) 0795769 B.C. Ltd. (Brenda Po Yin Leung) Ho Jing Investments Ltd. (Tung Mui Wong) 0792543 B.C. Ltd. (Tung Mui Wong) S. Kong Development Co. Ltd. Steven Kong and Goey Kong 0767013 B.C. Ltd. (Wai Ling Kong and Darryl Kong) Yong A "Clara" Kim Kai Yen Cho and Hung Tern Kong Shao Qing Zhou Hui Fen Zhou 0792600 B.C. Ltd. (Wei Fong Chau) Fortune Peak Investments Inc. Ping Chang "Amy" Huang Da Sen "Sam" Huang Wei Qiang Wu Helen Situ Wen Zhan "Susana" Fang 0793067 B.C. Ltd. (Li Ming Dong and Yong Hua Tang) 0795205 B.C. Ltd. (Serena Wen) 2 Chinook Alize Enterprises Ltd. (Mei Ching Li) 0798331 B.C. Ltd. and Law Ng Young 0798331 B.C. Ltd. and Tony Jonathan Chew 0798331 B.C. Ltd. and Yuet-Kau Chew 0792142 B.C. Ltd. (Shelly Wong, Susan Chong and David Chan) Robert Pang 0795257 B.C. Ltd. (Alice Woo,	Mark Pontin Fasken Martineau DeMoulin LLP 2900-550 Burrard Street Vancouver, BC V6C 0A3 Email: mpontin@fasken.com

	<p>Justin Wu, Henry Wu, and Lai Wan Ip) 0795257 B.C. Ltd. (Yung Yung Hui) Xue Ju Yang 0796367 B.C. Ltd. (Mei Ling "May" Yang and Stephen So) 0796367 B.C. Ltd. (Chun "Felix" Lam) 0796367 B.C. Ltd. (Nan "Dolphin" Jiang) Zhao Dong Liang Chou Jie Sie 0796372 B.C. Ltd. (Sandy Qiao Ying Yee) Shi Ying Deng Lily Tan and Dudley Tan Steven Wong Chia Chih Tan and Sung Hua Ma Kwong Wing Leung Enterprises Ltd. John Doe Jane Doe Doe Corporation</p>	
S-139102	<p>Wheatland Industrial Park Inc. Chang Wei Tile Ltd. Super Tile & Construction Ltd. Bill Fong Investment Ltd. S.F. Investment Ltd. Ru Zhu Investment Ltd. 0794263 Ltd. 0794271 B.C. Ltd. 0805671 B.C. Ltd. 0805665 B.C. Ltd. 0792984 B.C. Ltd.</p>	<p>Winston Kam Remedios & Company 1010-1030 W Georgia Street, Vancouver, BC V6E 2Y3 Email: wkam@remediosandcompany.com</p>
S-149050	<p>0805652 B.C. Ltd. 0805663 B.C. Ltd. 0805658 B.C. Ltd. 0801660 B.C. Ltd. 0795671 B.C. Ltd. Bill Fong Investment Ltd. Chain Wei Tile Ltd. Super Tile & Construction Ltd. Shun Chi Company Ltd.</p>	<p>Glen Forrester Forrester & Company Suite 600, Randall Building 555 W Georgia St. Vancouver, BC V6B 1Z6 Email: gforrester@forresterbarristers.com; bettywu7925@gmail.com isayml@icloud.com i_leung@shaw.ca Bill.h.fong@gmail.com doublecolourtile@hotmail.com</p>
S-169097	<p>Guang Ming Benediction Ltd. Tzong Yow Jacky Hung Sharon Woan Rong Lee</p>	<p>Derek Young Gowling WLG #2300, 550 Burrard Street Vancouver, BC V6C 2B5 Email: Derek.Young@gowlingwlg.com</p>

To be completed by the court only:

Order made

in the terms requested in paragraphs _____
of Part 1 of this Notice of Application

with the following variations and additional terms:

Date:

Signature of Judge Master

APPENDIX

The following information is provided for data collection purposes only and is of no legal effect.

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 "B"
Form of Claims Process Order

NO. S-198522
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF SECTION 179.1 (FORMERLY SECTION 152) OF THE *SECURITIES ACT*, RSBC 1996, C. 418

BETWEEN:

BRITISH COLUMBIA SECURITIES COMMISSION

PETITIONER

AND:

SIU MUI “DEBBIE” WONG
SIU KON “BONNIE” SOO
ORIGIN BUSINESS PARK INC. formerly known as
WHEATLAND INDUSTRIAL PARK INC.
1300302 ALBERTA INC.
D & E ARCTIC INVESTMENTS INC.
DEREK WAI GIT WONG
FARM CREDIT CANADA

RESPONDENTS

ORDER MADE AFTER APPLICATION

BEFORE THE HONOURABLE JUSTICE)
) WEDNESDAY, THE 31st DAY
) OF MAY, 2023
)

ON THE APPLICATION of MNP Ltd., in its capacity as the Court-appointed receiver of certain assets, undertakings and properties of the Respondents and all proceeds therefrom (in such capacity, the “Receiver”), for a Claims Process Order (“**Claims Process Order**” as defined in the Notice of Application) pursuant to s. 152 of the *Securities Act*, R.S.B.C. 1996, c. 418, as amended, and s. 39 of the *Law and Equity Act*, R.S.B.C. 1996, c. 253, as amended, coming on for hearing at Vancouver, British Columbia, on the 31st day of May, 2023, AND ON HEARING William L. Roberts, counsel for the Applicant, and ●, counsel for ●;

AND ON READING the Notice of Application dated May 17, 2023, the Affidavit #9 of Patty Wood, sworn May 8, 2023, the Affidavit #3 of William Roberts, sworn May 16, 2023, the Receiver's Third Report to the Court dated May 8, 2023, and other materials filed herein.

THIS COURT ORDERS, DECLARES AND DIRECTS that:

Approval of Claims Process

1. The procedure set forth in this Order for determining claims of Creditors and distributing the Receivership Funds is hereby approved.

Interpretation and General Provisions

2. In this Order, the following terms shall have the following meanings:
 - (a) "**1300302**" means the Respondent 1300302 Alberta Inc.;
 - (b) "**1305402**" means 1305402 Alberta Inc.
 - (c) "**Alberta Joint Ventures**" means, collectively, the Rocky View #1 Joint Venture, the Rocky View #2 Joint Venture and the Wheatland Joint Venture;
 - (d) "**Claim**" means a right or claim of a Creditor on account of any indebtedness, liability, or obligation of any kind whatsoever that existed as of the date of the Receivership Order, whether or not previously asserted or made;
 - (e) "**Claimant**" means any person who is asserting or wishes to assert a Claim in relation to their investment in one or more of the Alberta Joint Ventures;
 - (f) "**Claims Bar Date**" means September 15, 2023 at 5:00 PT;
 - (g) "**Court**" means the Supreme Court of British Columbia;
 - (h) "**Creditor**" means any person, other than a Related Person, who invested in one or more of the Alberta Joint Ventures, whether by purchasing a joint venture unit or otherwise;
 - (i) "**D&E Arctic**" means the Respondent D & E Arctic Investments Inc.;
 - (j) "**Instruction Letter**" means the letter to Claimants or potential Claimants, which letter shall be substantially in the form attached hereto as **Schedule "B"**;
 - (k) "**Notice of Disallowance**" means the notice substantially in the form attached hereto as **Schedule "D"**;
 - (l) "**Notice to Creditors**" means the notice substantially in the form attached hereto as **Schedule "A"**;

- (m) “**Proof of Claim**” means the form completed and filed by a Creditor setting forth its Claim with supporting documentation, which notice shall be substantially in the form attached hereto as **Schedule “C”**;
- (n) “**Property**” means the meaning given to this term in the Second Amended and Restated Receivership Order granted on June 29, 2022;
- (o) “**Proven Creditor**” means a Creditor with a Claim, or a portion thereof, that has been allowed by the Receiver pursuant to the terms of this Order or, if an appeal is taken by the Claimant, has been allowed by the Court;
- (p) “**Receivership Funds**” means the proceeds of the Property that are available for distribution to Proven Creditors;
- (q) “**Receivership Order**” means the Receivership Order granted by Justice Groves of the Court on October 3, 2019, appointing MNP Ltd. as Receiver of certain assets, undertakings and property of Soo, Wong, 1300302, D&E Arctic and Wheatland, as amended by the Amended and Restated Receivership Order granted by Justice Horsman of the Court on August 27, 2021, and as further amended by the Second Amended and Restated Receivership Order granted by Justice Hinkson of the Court on June 29, 2022;
- (r) “**Receiver’s Website**” means the website created and maintained by the Receiver at <https://mnpdebt.ca/en/corporate/corporate-engagements/siu-mui-debbie-wong-siu-kon-bonnie-soo-origin-business-park-inc>, and containing:
- (i) information relating to these proceedings, the claims process contemplated by this Claims Process Order, and instructions on how to submit a Claim to the Receiver for adjudication;
 - (ii) electronic copies of the Notice to Creditors, Instruction Letter, and Proof of Claim;
 - (iii) copies of all pleadings and supporting materials in these proceedings; and
 - (iv) such other information as the Receiver may from time to time determine is necessary or desirable.
- (s) “**Related Person**” means any person who is, with respect to Soo, Wong, 1300302, D&E Arctic or Wheatland, as applicable:
- (i) with respect to Soo or Wong, an individual connected by blood relationship, marriage, common-law partnership or adoption;
 - (ii) with respect to 1300302, D&E Arctic or Wheatland, a person who:
 - A. controls any of those entities, for the purposes of this definition, a corporation is controlled by a person if:

- (a) shares of the corporation are held, other than by way of security only, by the person, or are beneficially owned, other than by way of security only, by: (i) the person, or (ii) a corporation controlled by the person; and
 - (b) the votes carried by the shares mentioned in paragraph (a) are sufficient, if exercised, to elect or appoint a majority of the directors of the corporation;
- B. was or is a director or officer of any of those entities; or
 - C. is connected by blood relationship, marriage, common-law partnership or adoption to a person described in subparagraph A or B;
- (t) **“Rockyview #1 Joint Venture”** means the joint venture project established by Soo and Wong involving the sale of investment or “joint venture” units by Soo and Wong, which units entitled investors to an undivided interest in 152.8 acres of land in Rocky View County, Alberta, which were held by 1300302 and D&E Arctic as bare trustees for the investors;
 - (u) **“Rockyview #2 Joint Venture”** means the joint venture project established by Soo and Wong involving the sale of investment or “joint venture” units by Soo and Wong, which units entitled investors to an undivided interest in certain development lands in Rocky View County, Alberta, which were held by 1305402 as bare trustee for investors;
 - (v) **“Soo”** means the Respondent Siu Mui “Bonnie” Soo;
 - (w) **“Wheatland”** means the Respondent Origin Business Park Inc., formerly known as Wheatland Industrial Park Inc.;
 - (x) **“Wheatland Joint Venture”** means the joint venture project established by Soo and Wong involving the sale of investment or “joint venture” units by Soo and Wong, which units entitled investors to an undivided interest in 306 acres of land in Wheatland County, Alberta, held by Wheatland as bare trustee for the investors; and
 - (y) **“Wong”** means the Respondent Siu Kon “Debbie” Wong.
3. The Receiver may cause any or all of:
- (a) the Receiver’s Website,
 - (b) the documents available on the Receiver’s Website, and
 - (c) any of the documents in Schedules A to D,

to be translated and available in a language other than English as the Receiver may from time to time determine is necessary or desirable.

Notification

4. Notice of these proceedings and the claims process contemplated by this Order shall be given by:
- (a) the Receiver creating and maintaining the Receiver's Website; and
 - (b) the British Columbia Securities Commission posting notice of these proceedings and this Claims Process Order to its website,

and the Receiver and the British Columbia Securities Commission are hereby authorized and directed to take such steps as are necessary to fulfill the requirements of this paragraph.

5. Providing notice in accordance with paragraph 4 above shall constitute good and sufficient service and delivery of notice (i) of this proceeding and this Claims Process Order, and (ii) the Claims Bar Date, on all Claimants and any persons wishing to assert a Claim, and any other person who may be entitled to receive service or notice thereof, and no other document or material need be sent to or served upon any actual or potential Claimants or person in respect of these proceedings or this Claims Process Order.

Claims Process and Barring of Claims

6. In administering this claims process, the Receiver is empowered and authorized to engage, utilize, and rely upon any staff of the British Columbia Securities Commission who are made available by the British Columbia Securities Commission to assist the Receiver in discharging its mandate hereunder.
7. To make a Claim, a Claimant must complete and submit a Proof of Claim to the Receiver by either:
- (a) sending a complete Proof of Claim, along with supporting documents, all in electronic form, to the Receiver by electronic mail to the following e-mail address: Patty.Wood@mnp.ca; or
 - (b) sending a completed Proof of Claim, along with supporting documents, to the Receiver by hand-delivery, regular mail, registered mail, or courier at the following address:

Suite 1600, MNP Tower
 1021 West Hastings Street
 Vancouver, BC V6E 0C3
 Attention: Patty E. Wood

8. When completing a Proof of Claim, each Claimant must:

- (a) provide their name and mailing address;
- (b) provide substantially all of the requested information on the Proof of Claim; and
- (c) indicate, in the manner set out on the Proof of Claim, that they are declaring the information provided in the Proof of Claim to be complete and true as if the Proof of Claim were made under oath or solemn declaration,

failing which, the Receiver may elect to treat the Proof of Claim as a nullity.

9. A Claimant may submit a Proof of Claim (including any supporting documentation) in either the English language or, with the prior consent of the Receiver, in a language other than English.
10. Any Claimant who fails to deliver a Proof of Claim to the Receiver in accordance with this Claims Process Order on or before the Claims Bar Date shall:
 - (a) be forever barred, estopped and enjoined from asserting or enforcing any Claim against the Receivership Funds and such Claim shall be forever extinguished;
 - (b) not be entitled to participate in any distribution of the Receivership Funds; and
 - (c) not be entitled to any further notice in these proceedings.
11. The Receiver may, in its discretion, extend the Claims Bar Date for up to a further four (4) weeks.

Adjudication of Claims

12. The Receiver shall review and scrutinize each Proof of Claim received by the Claims Bar Date with the objective of adjudicating those claims in a fair, efficient and effective manner; however, the Receiver may, despite the passing of the Claims Bar Date, request further information and documents from a Claimant in respect of a previously submitted Proof of Claim and shall set a further deadline for the Claimant to provide such further information and records as requested.
13. In calculating each Claim, the Receiver shall have reference only to the following:
 - (a) “**Amount Advanced**” means the principal amount advanced by each Creditor to the Wheatland Joint Venture, the Rocky View #1 Joint Venture, or the Rocky View #2 Joint Venture, without regard to any interest or profit on that amount; and
 - (b) “**Amount Returned**” means all amounts paid or returned to each Creditor by or on behalf of the Wheatland Joint Venture, the Rocky View #1 Joint Venture, or the Rocky View #2 Joint Venture, without regard to whether any portion of that amount was characterized as interest, dividends, redemptions, or profits,

and each Claim shall be determined by deducting the Amount Returned from the Amount Advanced.

14. The Receiver may give notice in writing, by ordinary mail, electronic mail, or personal delivery to any Claimant at the address or electronic mail address shown on the Claimant's Proof of Claim, of the Receiver's intention to revise or disallow the claim set out in such Proof of Claim for distribution purposes and, if revised or disallowed, the reasons therefore, by delivering to the Claimant a Notice of Disallowance.
15. A Claimant may appeal a Notice of Disallowance, in whole or in part, of a Proof of Claim to this Court by summary application provided that the Notice of Application and all supporting affidavit materials, are filed with this Court and delivered to the Receiver within 30 days of the Receiver having delivered the Notice of Disallowance. Any such appeal shall be conducted as a true appeal, and not a hearing *de novo*.
16. If a Claimant fails or neglects to perfect an appeal of a Notice of Disallowance by filing and serving a Notice of Application and all supporting affidavits as set out above, then that Claimant shall have no further right of appeal and shall be deemed to accept the amount of its Claim, if any, as set out in the Notice of Disallowance and the Creditor shall be deemed to be a Proven Creditor for such amounts set forth in the Notice of Disallowance.

Distribution Scheme

17. After the Claims Bar Date has passed, the Receivership Funds shall be pooled and distributed to all Proven Creditors *pro rata*, regardless of whether a Proven Creditor's Claim is with respect to the Wheatland Joint Venture, the Rocky View #1 Joint Venture, or the Rocky View #2 Joint Venture, or any combination thereof.
18. The Receiver may, but is not obligated to, apply to this Court to approve the distribution of Receivership Funds to Proven Creditors.

General

19. Except as otherwise expressly provided for herein, the Receiver may provide any notice or may effect delivery of documents, including a Notice to Creditors, to any potential or actual Claimant by sending that notice or those documents by electronic mail, courier, or by regular mail, as may be determined in the Receiver's discretion. Any document or notice sent by the Receiver by electronic mail shall be deemed to be received immediately upon having been sent. Any document or notice sent by the Receiver by regular mail shall be deemed to be received on the seventh (7th) day following the date of mailing.
20. Any notice or other communication to be given to the Receiver shall be in substantially the form (if any) provided for in this Claims Process Order or in the form provided by the Receiver. Such notice of communication will be sufficiently given only if delivered by email (in PDF format), registered mail, courier, or personal delivery, addressed to:

Suite 1600, MNP Tower
 1021 West Hastings Street
 Vancouver, BC V6E 0C3
 Attention: Patty E. Wood

Patty.Wood@mnp.ca

Any document or notice sent to the Receiver in accordance with this Claims Process Order shall be deemed to be received at the date and time when it is actually received.

- 21. The Receiver is authorized to use its reasonable discretion as to the adequacy of compliance with respect to the manner in which Proofs of Claim are completed and executed and may, if the Receiver is satisfied that a Claim has been adequately proven, waive strict compliance with the procedures set out herein and as to the completion and execution of Proof of Claims.
- 22. The Receiver, in addition to its prescribed powers and duties under the Receivership Order, and under any statute, is authorized and directed to take such other actions and fulfil such other roles as are contemplated by this Claims Process Order.
- 23. References in this Claims Process Order to the singular shall include the plural, and references to the plural shall include the singular, and the use of any gender pronoun shall include all other gender pronouns.
- 24. The Receiver may apply to this Court from time to time for directions and for such further order or orders as it considers necessary or desirable to amend, supplement, or replace any term of this Claims Process Order. In particular, the Receiver may apply to this Court to approve or seek directions in relation to the adjudication of claims or the distribution of the Receivership Funds.
- 25. Approval of this Order as to form by counsel or parties in attendance, other than counsel for the Applicant, is hereby dispensed 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:

William L. Roberts
 COUNSEL FOR THE PETITIONER

BY THE COURT

REGISTRAR

SCHEDULE "A"**NOTICE TO INVESTORS**

To Whom It May Concern:

Pursuant to an Order pronounced October 3, 2019, and as amended on August 22, 2021, and June 29, 2022, the Supreme Court of British Columbia appointed MNP Ltd. as receiver (in such capacity, the "**Receiver**") over certain assets, undertakings and property, and all proceeds thereof (collectively, the "**Property**") held by or on behalf of, among others, Siu Kon "Debbie" Wong, Siu Mui "Bonnie" Soo, Origin Business Park Inc., formerly known as Wheatland Industrial Park Inc., 1300302 Alberta Inc., and D & E Arctic Investments Inc. (collectively, the "**Respondents**").

Pursuant to a Claims Process Order pronounced on May 31, 2023 (the "**Claims Process Order**"), the Supreme Court of British Columbia directed the Receiver to administer a claims and distribution process through which those persons with a legitimate claim to the funds comprising, and/or the proceeds of the Property held by the Receiver (the "**Receivership Funds**") could advance claims and receive distributions. All capitalized terms used but not separately defined in this Notice have the meaning given to them in the Claims Process Order.

Any Creditor (which includes both individuals as well as corporations and other non-natural persons) wishing to make a Claim against any or all of the Respondents or the Receivership Funds must follow the process and procedures set out in the Claims Process Order. We refer you to the definitions of "Creditor" and "Related Person" in the Claims Process Order. **Please note that an investor who is also a Related Person is excluded from the claims and distribution process and is not eligible to participate in the distribution of the Receivership Funds.**

To make a Claim, you must file a Proof of Claim **on or before September 15, 2023** (the "**Claims Bar Date**") in accordance with the Claims Process Order.

If you do not file a Proof of Claim by the Claims Bar Date, **your claim will be barred and extinguished forever** and you will not be entitled to participate in any way in the distribution of Receivership Funds.

Copies of the Claims Process Order, the Proof of Claim form, and instructions as to how to make a Claim, along with copies of all other pleadings and reports filed in the receivership proceedings, may be obtained on the Receiver's Website at: <https://mnpdebt.ca/en/corporate/corporate-engagements/siu-mui-debbie-wong-siu-kon-bonnie-soo-origin-business-park-inc.>

If you have any questions regarding the claims process, please email Patty.Wood@mnp.ca.

Dated the ● of ●, 2023 at Vancouver, British Columbia.

MNP LTD., In its capacity as Receiver of Siu Kon "Debbie" Wong, Siu Mui "Bonnie" Soo, Origin Business Park Inc. (formerly Wheatland Industrial Park Inc.), 1300302 Alberta Inc., and D & E Arctic Investments Inc., and not in its personal or corporate capacity

Per:
Name:
Title:

SCHEDULE "B"**INSTRUCTION LETTER**

In the matter of the receivership of Siu Kon "Debbie" Wong ("**Wong**"), Siu Mui "Bonnie" Soo ("**Soo**"), Origin Business Park Inc., formerly known as Wheatland Industrial Park Inc. ("**Wheatland**"), 1300302 Alberta Inc. ("**1300302**"), and D & E Arctic Investments Inc. ("**D&E Arctic**").

NOTE: claims not completed correctly will not be accepted

NOTE: to any person wishing to make a claim who does not submit a Proof of Claim on or before the Claims Bar Date of September 15, 2023, your claim will be barred and extinguished forever.

Completing the Proof of Claim

1. If you are completing the Proof of Claim on behalf of a corporation you must state your position or title, e.g. "president" or "credit manager", etc.
2. Each of the following fields must be completed: Name, Address, City, Country, Telephone, and Email.
3. Evidence to support the amounts claimed must be attached to the Proof of Claim and marked as Schedule "A", which should include copies of cancelled cheques or money orders, wire details to payments made to Wheatland, 1300302, or D&E Arctic, screenshots showing payments made online or receipts received
4. Please ensure all items set out in questions 1 to 8 of the Proof of Claim are completed.
5. Please note that for your claim to be accepted you must confirm by checking the appropriate box that the information contained in the Proof of Claim is given by you as if it were made under oath or by solemn declaration.

Submitting the Proof of Claim

You may submit the Proof of Claim in any of the following three ways:

1. You may download the Proof of Claim, complete it by hand or electronically, and then send that completed Proof of Claim along with supporting documents in PDF format to the Receiver at the following email address: Patty.Wood@mnp.ca; or
2. You may download the Proof of Claim, complete it by hand and then send that completed Proof of Claim, along with supporting documents, in hardcopy to the Receiver at the following mailing address:

Suite 1600, MNP Tower
1021 West Hastings Street
Vancouver, BC V6E 0C3
Attention: Patty E. Wood

Adjudication of Claims

The Receiver will only adjudicate all Proof of Claims received prior to the Claims Bar Date.

If the Receiver disallows all or a portion of your claim, the Receiver will send you a Notice of Disallowance. If you disagree with the Receiver's findings, as set out in the Notice of Disallowance, you may appeal the Receiver's decision by following the appeal procedures set out in the Claims Process Order. If you do not appeal the Receiver's decision in the manner and within the time limits set out in the Claims Process Order, then you will be deemed to have accepted the Receiver's decision, as set out in the Notice of Disallowance.

SCHEDULE "C"

PROOF OF CLAIM

In the matter of the receivership of Siu Kon "Debbie" Wong ("**Wong**"), Siu Mui "Bonnie" Soo ("**Soo**"), Origin Business Park Inc., formerly known as Wheatland Industrial Park Inc. ("**Wheatland**"), 1300302 Alberta Inc. ("**1300302**"), and D & E Arctic Investments Inc. ("**D&E Arctic**"), and the claim of:

Claimant name: _____

Address: _____

City: _____ Province: _____

Country: _____ Postal Code: _____

Telephone: _____

Email: _____

Mailing address (if different than above):

I, _____ (*name of Claimant or name of representative*), of _____ (*city, province, country*), do hereby certify:

1. I have reviewed the documents and information contained on the website at ● and wish to make a claim.

2. That:

I am the Claimant; or

I am the _____ (*position or title*) of the Claimant; and

I confirm that the Claimant is not a Related Person, as defined in the Claims Process Order.

3. That I have the knowledge of all the circumstances connected with the claim referred to in this form, and am authorized by the Claimant to submit this claim.

4. That I am making a claim as an investor, whether by way of purchasing a joint venture unit or otherwise, in the Wheatland Joint Venture, the Rocky View #1 Joint Venture, or the Rocky View #2 Joint Venture, as each of those terms are defined in the Claims Process Order granted by the Supreme Court of British Columbia on [●], 2023.

5. My claim is as an investor, limited partner, or shareholder in (*select one*):

- Wheatland Joint Venture;
- Rocky View #1 Joint Venture; or
- Rocky View #2 Joint Venture.

6. Please detail all amounts paid by the Claimant in respect of any of the Wheatland Joint Venture, the Rocky View #1 Joint Venture, or the Rocky View #2 Joint Venture:

Date	Method of payment	Who payment was made to	Reason for payment	Amount of Funds Received
				\$
				\$
				\$
				\$

7. Please detail all amounts received by or on behalf of the Claimant in respect of any of the Wheatland Joint Venture, the Rocky View #1 Joint Venture, or the Rocky View #2 Joint Venture:

Date	Method of payment	Who payment was made by	Amount of Funds Received
			\$
			\$
			\$
			\$

All amounts received by, or on behalf of the Claimant, must be set out above without regard to whether any portion of the amounts received were characterized as interest, dividends, redemptions, or profits.

8. Attach as **Schedule "A"** to this Proof of Claim all supporting documents which is evidence of your claim (may include a statement of account, copies of cancelled cheques

or money orders, wire confirmations, bank statements, receipts, invoices, screenshots, etc.)

Dated this _____ day of _____, 202__.

DECLARATION:

I confirm that the information submitted in and with this Proof of Claim is true and accurate in every respect and is being provided to the Receiver as if made under oath or solemn declaration.

Signature of Claimant or Authorized Representative

Name:
Position:

Witness
Witness Name:
Address:

SCHEDULE "D"

NOTICE OF DISALLOWANCE

To: [Name and address investor] (the "Claimant")

Date: [date]

Proof of Claim submitted on [Claim Date]

Take notice that MNP Ltd., in its capacity as court-appointed receiver (in such capacity, the "Receiver") of certain assets, undertakings and properties held by or on behalf of Siu Kon "Debbie" Wong, Siu Mui "Bonnie" Soo, Origin Business Park Inc., formerly known as Wheatland Industrial Park Inc., 1300302 Alberta Inc., D & E Arctic Investments Inc., and others, has reviewed the Proof of Claim in respect of the above named Claimant and has assessed the Proof of Claim in accordance with the order of the Supreme Court of British Columbia issued on [●], 2023 (the "Claims Process Order").

All capitalized terms not defined herein have the meaning given to such terms in the Claims Process Order.

The Receiver has reviewed your Proof of Claim in accordance with the Claims Process Order, and has revised or disallowed your Claim for the following reason(s):

Subject to appeal by you in accordance with the Claims Process Order, your Claim will be allowed as follows:

Name of Claimant	Claim Amount per Proof of Claim	Amount of Claim Disallowed	Amount of Claim Admitted
	\$	\$	

IF YOU WISH TO APPEAL THE DISALLOWANCE OF YOUR CLAIM YOU MUST FILE WITHIN 30 DAYS OF THE DATE OF THIS NOTICE AN APPLICATION WITH THE SUPREME COURT OF BRITISH COLUMBIA AND PROVIDE WITHIN THE SAME PERIOD THE NOTICE OF APPLICATION AND ALL SUPPORTING AFFIDAVITS TO THE RECEIVER.

If you do not appeal the disallowance of your Claim in accordance with the above instructions and the Claims Process Order and the amount, as set out herein, will be deemed to be accepted.

Dated the ● of ●, 2023.

MNP LTD.

In its capacity as Receiver of Siu Kon “Debbie” Wong, Siu Mui “Bonnie” Soo, Origin Business Park Inc., formerly known as Wheatland Industrial Park Inc., 1300302 Alberta Inc., and D & E Arctic Investments Inc., and not in its personal or corporate capacity

Per:

Name:

Title:

NO. S-198522
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

BRITISH COLUMBIA
SECURITIES COMMISSION

PETITIONER

AND:

SIU MUJ "DEBBIE" WONG
SIU KON "BONNIE" SOO
ORIGIN BUSINESS PARK INC.
formerly known as WHEATLAND
INDUSTRIAL PARK INC.
1300302 ALBERTA INC.
D & E ARCTIC INVESTMENTS INC.
DEREK WAI GIT WONG
FARM CREDIT CANADA

RESPONDENTS

ORDER MADE AFTER APPLICATION



Barristers & Solicitors
1600 Cathedral Place
925 West Georgia Street
Vancouver, British Columbia
V6C 3L2

Phone: (604) 685-3456
Attention: William Roberts

SCHEDULE "C"
Form of Removal Order

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF
SECTION 179.1 OF THE *SECURITIES ACT*, RSBC 1996, C. 418

BETWEEN:

BRITISH COLUMBIA SECURITIES COMMISSION

PETITIONER

AND:

SIU MUI “DEBBIE” WONG
SIU KON “BONNIE” SOO
ORIGIN BUSINESS PARK INC., formerly known as
WHEATLAND INDUSTRIAL PARK INC.
1300302 ALBERTA INC.
D & E ARCTIC INVESTMENTS INC.
DEREK WAI GIT WONG
FARM CREDIT CANADA

RESPONDENTS

**ORDER MADE AFTER APPLICATION
TO REMOVE NAMED RESPONDENTS**

BEFORE THE HONOURABLE) WEDNESDAY, THE 31st DAY
)
) DAY OF MAY, 2023
)

THE APPLICATION of MNP Ltd., in its capacity as Court-appointed Receiver (the “**Receiver**”) of the assets, undertakings and properties of the Respondents Siu Mui “Debbie” Wong, Siu Kon “Bonnie” Soo, Origin Business Park Inc., formerly known as Wheatland Industrial Park Inc., 1300302 Alberta Inc. and D & E Arctic Investments Inc. (collectively, the “**Debtors**”), coming on for hearing at Vancouver, British Columbia, on the 31st day of May, 2023; AND ON HEARING William Roberts, counsel for the Receiver and ● appearing for the Petitioner or the Respondents, AND UPON READING the material filed herein;

THIS COURT ORDERS that:

1. Derek Wai Git Wong and Farm Credit Canada be removed as named Respondents to these proceedings.

2. The style of proceedings be and is hereby amended accordingly.
3. Preparation and service of an Amended Petition on all parties be and is hereby dispensed with.
4. The terms of Rule 6-2(8) of the Supreme Court Civil Rules be dispensed with.
5. The Receiver shall be entitled to its costs of this application.

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:

William Roberts
COUNSEL FOR THE APPLICANT

BY THE COURT

REGISTRAR

NO. S-198522
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF
SECTION 179.1 OF THE *SECURITIES ACT*, RSBC 1996, C. 418

BETWEEN:

BRITISH COLUMBIA SECURITIES COMMISSION

PETITIONER

AND:

SIU MUI "DEBBIE" WONG
SIU KON "BONNIE" SOO
ORIGIN BUSINESS PARK INC., formerly known as
WHEATLAND INDUSTRIAL PARK INC.
1300302 ALBERTA INC.
D & E ARCTIC INVESTMENTS INC.
DEREK WAI GIT WONG
FARM CREDIT CANADA

RESPONDENTS

ORDER TO REMOVE NAMED RESPONDENTS



Barristers & Solicitors
1600 Cathedral Place
925 West Georgia Street
Vancouver, British Columbia
V6C 3L2
Phone: (604) 685-3456
William L. Roberts
Email: wroberts@lawsonlundell.com

SCHEDULE "D"
Form of Approval Order

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF SECTION 179.1 (FORMERLY SECTION 152) OF THE *SECURITIES ACT*, RSBC 1996, C. 418

BETWEEN:

BRITISH COLUMBIA SECURITIES COMMISSION

PETITIONER

AND:

SIU MUI “DEBBIE” WONG
SIU KON “BONNIE” SOO
ORIGIN BUSINESS PARK INC., formerly known as
WHEATLAND INDUSTRIAL PARK INC.
1300302 ALBERTA INC.
D & E ARCTIC INVESTMENTS INC.
DEREK WAI GIT WONG
FARM CREDIT CANADA

RESPONDENTS

**ORDER MADE AFTER APPLICATION
TO APPROVE ACTIVITIES AND FEES**

BEFORE THE HONOURABLE)
)
) WEDNESDAY, THE 31ST DAY
)
) DAY OF MAY, 2023

THE APPLICATION of MNP Ltd., in its capacity as Court-appointed Receiver (the “**Receiver**”) of the assets, undertakings and properties of the Respondents Siu Mui “Debbie” Wong, Siu Kon “Bonnie” Soo, Origin Business Park Inc., formerly known as Wheatland Industrial Park Inc., 1300302 Alberta Inc. and D & E Arctic Investments Inc. (collectively, the “**Debtors**”), coming on for hearing at Vancouver, British Columbia, on the 31st day of May, 2023 AND ON HEARING William Roberts, counsel for the Receiver and no one appearing for the Petitioner, the Respondents or the Intended Respondents, although duly served, AND UPON READING the material filed, including the Receiver’s Third Report to the Court dated May 8, 2023 (the “**Third Report**”);

THIS COURT ORDERS that:

1. The time for service of this Notice of Application and supporting materials is hereby abridged so that the application is properly returnable on May 31, 2023, and the need for

further service of the Notice of Application and supporting materials is hereby dispensed with.

2. The activities of the Receiver from November 1, 2022 to the date of the Third Report, as set out in the Third Report, be and are hereby approved by the Court.
3. The Receiver's Statement of Receipts and Disbursements for the period ending May 8, 2023 be and is hereby approved by the Court.
4. The professional fees and disbursements of the Receiver incurred from November 1, 2022 to April 30, 2023 be and are hereby approved by the Court.
5. The legal fees and disbursements of the Receiver's counsel incurred from November 1, 2022 to April 30, 2023 be and are hereby approved by the Court.

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:

William Roberts
COUNSEL FOR THE APPLICANT

BY THE COURT

REGISTRAR

NO. S-198522
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF
SECTION 179.1 OF THE *SECURITIES ACT*, RSBC 1996, C. 418

BETWEEN:

BRITISH COLUMBIA SECURITIES COMMISSION

PETITIONER

AND:

SIU MUI "DEBBIE" WONG
SIU KON "BONNIE" SOO
ORIGIN BUSINESS PARK INC., formerly known as
WHEATLAND INDUSTRIAL PARK INC.
1300302 ALBERTA INC.
D & E ARCTIC INVESTMENTS INC.
DEREK WAI GIT WONG
FARM CREDIT CANADA

RESPONDENTS

ORDER TO APPROVE ACTIVITIES AND FEES



Barristers & Solicitors
1600 Cathedral Place
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Phone: (604) 685-3456
William L. Roberts
Email: wroberts@lawsonlundell.com

NO. S-198522
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

BRITISH COLUMBIA
SECURITIES COMMISSION

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INDUSTRIAL PARK INC.
1300302 ALBERTA INC.
D & E ARCTIC INVESTMENTS INC.
DEREK WAI GIT WONG
FARM CREDIT CANADA

RESPONDENTS

NOTICE OF APPLICATION



Barristers & Solicitors
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V6C 3L2
Phone: (604) 685-3456
Attention: William Roberts