25-Nov-19



NO. S1912223 VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

AUSTIN WONG and DEREK WONG in their capacities as joint executors of the ESTATE OF WAI HUNG WONG

PETITIONER

AND:

SIU MUI WONG

THE TORONTO-DOMINION BANK 0801660 B.C. LTD.

0795671 B.C. LTD. 0805652 B.C. LTD. 0805658 8.C. LTD. 0805663 B.C. LTD.

SHUN CHI COMPANY LTD.

SUPER TILE & CONSTRUCTION LTD. CHANG WEI TILE LTD.

BILL FONG INVESTMENT LTD. FARM CREDIT CANADA

BRITISH COLUMBIA SECURITIES COMMISSION

RESPONDENTS

RESPONSE TO PETITION

Filed by:

British Columbia Securities Commission

(the "Petition Respondent")

THIS IS A RESPONSE TO the Petition filed on October 29, 2019.

Part 1: ORDERS CONSENTED TO

The Petition Respondent consents to the granting of the orders set out in the following paragraphs of Part 1 of the Petition:

NIL

Part 2: ORDERS OPPOSED

The Petition Respondent opposes the granting of the orders set out in the following paragraphs of Part 1 of the Petition:

Unknown. The Petition Respondent reserves the right to oppose orders as the proceedings continue and such further application materials are received.

ORDERS ON WHICH NO POSITION IS TAKEN Part 3:

The Petition Respondent takes no position on the granting of orders set out in the following paragraphs of Part 1 of the Petition; All

FACTUAL BASIS Part 4:

- Pursuant to an Order pronounced October 3, 2019, MNP Ltd. was appointed as 1. Receiver, without security, of certain of the assets, undertakings and property of 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., which included the lands and premises that are the subject matter of these proceedings.
- The Receiver takes no position on the relief sought by the Petitioners herein. 2,
- The Petition Respondent requests that it be given notice of the hearing of the 3. Petition, and any subsequent or other applications filed in these proceedings.

LEGAL BASIS Part 5:

Rule 16-1(4) of the Supreme Court Civil Rules. 4.

MATERIAL TO BE RELIED ON Part 6:

Such Affidavits as may be provided should the Petition Respondents oppose any 5. application to be brought herein.

The Petition Respondent estimates that the application will take 5 minutes.

Dated at the City of Vancouver, in the Province of British Columbia, this November, 2019.

day of

William L. Roberts Lawson Lundell LLP

Solicitors for the Petition Respondent

The Petition Respondent's address for service is:

c/o Lawson Lundell LLP 1600 - 925 West Georgia Street Vancouver, BC V6C 3L2 Attention: William L. Roberts

Fax number for delivery is: (604) 669-1620

Email for delivery is: wroberts@lawsonlundell.com

The name and office address of the Petition Respondent's solicitor is as set out above.