VANCOUVER
JUL 16 2020
REGISTRY

District of British Columbia
Division No. 03 – Vancouver
Court No. B-180368
Estate No. 11-2375063
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY AND INSOLVENCY

IN THE MATTER OF THE BANKRUPTCY OF
JIZHE YANG

IN THE MATTER OF THE RECEIVERSHIP OF
PE CONSULTING LTD.

SECOND REPORT OF THE RECEIVER

ERNST & YOUNG INC.,

DATED JULY 15, 2020

TABLE OF CONTENTS
TO THE
SECOND REPORT OF THE RECEIVER

LISTING OF APPENDICES

SECOND REPORT TO THE COURT
OF ERNST & YOUNG INC.,
RECEIVER OF PE CONSULTING LTD.

Effective as at July 15, 2020

CONDENSED INTRODUCTION AND PURPOSE

<u>Introduction</u>

1. This condensed introduction in this Second Report of the Receiver (the "**Second Report**") is intended to be read in conjunction with the introduction in the First Report of the Receiver dated October 11, 2019 (the "**First Report**").

2. On June 8, 2018, G. Powroznik Inc. ("**GPGI**"), in its capacity as the former trustee (and, in such capacity, the "**Former Trustee**") of the bankruptcy estate (the "**Bankruptcy Estate**") of Jizhe (Mary) Yang, a bankrupt ("**Yang**"), who was the sole director of PE Consulting Ltd. (the "**Company**"), sought and obtained an order (the "**Original Order**") pursuant to which GPGI was appointed as receiver and receiver manager (in such capacity, the "**Former Receiver**"), without security, of all of the assets, undertakings and property of the Company acquired for, or used in relation to business carried on by the Company.

3. On December 10, 2018, Prima Technology, Inc. ("**PTI**") sought and obtained an order (the "**Amended and Restated Receivership Order**") pursuant to which Ernst & Young Inc. ("**EYI**") was substituted in place of GPGI as the receiver and receiver manager (and, in such capacity, the "**Receiver**") of the Property.

4. During 2019, the Receiver worked with various parties and stakeholders in order to perform, *inter alia*, the following activities:

   a) review the books and records of the Company;

b) investigate certain transactions that occurred prior to the granting of the Original Order;

c) respond to the Former Receiver's application for, among other things, approval of its fees and disbursements and approval of the fees and disbursements of its legal counsel (the "**Former Receiver's Taxation Application**");

d) prepare, review, and file the Company's tax returns for the period of 2011 to 2019 (the "**PE Tax Returns**");

e) engage contractors to remediate (the "**Highview Remediation**") a personal residence owned by the Company at 2791 Highview Place, West Vancouver, BC (the "**Highview Property**"), the details of which are contained in the First Report;

f) prepare the Highview Property for sale; and

g) sell the Highview Property.

<u>Sale of the Highview Property</u>

5. On October 29, 2019, and following the completion of the Highview Remediation, this Honourable Court granted an Order (the "**Approval and Vesting Order**") that, *inter alia*:

a) approved the sale transaction (the "**Sale Transaction**") contemplated by the purchase and sale agreement dated September 24, 2019 (the "**Sale Agreement**") between the Receiver and Yong Ge Zhai and Yang Shao (the "**Purchasers**") for the sale if the Highview Property in the amount of $5,260,000 (the "**Purchase Price**"), and declared the Sale Agreement to be commercially reasonable;

b) authorised the Receiver to make an interim distribution from the net proceeds of the Highview Property to pay the amounts owing pursuant to the Receivers' Certificate secured by the Receiver's Borrowing Charge (each as defined in the Amended and Restated Receivership Order); and

c) authorised and ordered the Receiver to make an interim distribution from the sale proceeds in such an amount sufficient to pay to the Bank of Montreal ("**BMO**") all outstanding amounts owed by the Company and secured by the mortgage in favour of BMO.

6. On October 29, 2019, this Honourable Court granted a further Order that approved, *inter alia*, the following:

   a) the First Report and the activities of the Receiver referred to therein;

   b) the accounts of the Receiver and its counsel, as described in the First Report; and

   c) an increase in the Receiver's Borrowing Charge to a maximum of $650,000.

7. On November 1, 2019, the Purchaser requested an extension (the "**Extension Request**") of the closing date for the Sale Transaction from November 4, 2019 to November 5, 2019 (the "**Completion Date**"), which was subsequently agreed to by the Receiver.

8. On November 5, 2019 the Receiver's legal counsel confirmed that they had received, in trust, $5,095,081 in net sale proceeds (the "**Net Sales Proceeds**") from the sale of the Highview Property. A detailed analysis of closing adjustments made and the calculation of the Net Sales Proceeds is provided below.

9. On November 5, 2019, the Receiver executed a Receiver's Certificate certifying the following:

   a) the Purchasers have paid, and the Receiver has received the Net Sales Proceeds for the Highview Property at the Completion Date pursuant to the Sale Agreement; and

b) the Sale Transaction has been completed to the satisfaction of the Receiver.

10. Due to an oversight, the Receiver's Certificate was delayed and was filed with this Honourable Court on February 19, 2020.

<u>Purpose of the Second Report</u>

11. The purpose of this Second Report is to, *inter alia*:

a) provide this Honourable Court with information pertaining to the following:

i. the activities of the Receiver since the First Report;

ii. the Sale Transaction, including:

a) the closing of the Sale Transaction;

b) the calculation of the Net Sales Proceeds;

c) the priority payment made from the Net Sales Proceeds to, *inter alia*, BMO, as directed in the Approval and Vesting Order;

iii. repayment of borrowings pursuant to the Receivers' Certificate secured by the Receiver's Borrowing Charge;

iv. update on transfers at undervalue;

v. update on preparing and filing the PE Tax Returns;

vi. the Former Receiver's accounts, fees and disbursements;

vii. a proposed claims process for the purpose of identifying, evaluating, and determining claims ("**Claims**") of creditors of the Company, and their respective entitlement to the proceeds from the assets of the Company (the "**Proposed Claims Process**");

viii. the recommendations of the Receiver; and

b) seek an order from this Honourable Court approving, *inter alia*:

i. the Proposed Claims Process (the "**Proposed Claims Process Order**");

ii. the fees and expenses of the Receiver as outlined herein;

iii. the fees and expenses of the Receiver's legal counsel as outlined herein; and

iv. the Second Report and the activities of the Receiver to the date hereof and described herein.

TERMS OF REFERENCE

12. In preparing this Second Report, the Receiver has relied upon unaudited financial information provided by PTI, the Former Receiver, the Former Trustee, Yang, and other third parties. The Receiver has not audited, reviewed or otherwise attempted to verify the accuracy or completeness of this information in a manner that would wholly or partially comply with Generally Accepted Assurance Standards pursuant to the Chartered Professional Accountants Canada Handbook and, accordingly, the Receiver expresses no opinion or other form of assurance in respect of this information.

13. All references to dollars are in Canadian currency unless otherwise noted.

ACTIVITIES OF THE RECEIVER TO DATE

14. Since the First Report, the Receiver has, *inter alia*:

a) reviewed and approved the Extension Request;

b) reviewed and approved the Statement of Adjustments to the Purchase Price to determine the Net Sales Proceeds;

c) arranged for the receipt of the Net Sales Proceeds from the Sale Transaction and made payment to BMO pursuant to the Approval and Vesting Order;

d) prepared and filed the Receiver's Certificate with respect to the close of the Sale Transaction;

e) prepared application response materials and affidavit evidence related to the Former Receiver's Taxation Application;

f) corresponded with legal counsel, lenders, and PTI with respect to the pursuit of potential transactions at undervalue;

g) corresponded internally with EYI tax professionals and with Canada Revenue Agency ("**CRA**") with respect to filing of the Company's tax returns, and prepared the Company's tax returns from inception in 2011 to 2019;

h) prepared and reviewed the Proposed Claims Process Order;

i) prepared and reviewed the Receiver's Statement of Receipts and Disbursements for the period December 10, 2018 to June 6, 2020 (the "**SRD**"), as detailed below;

j) reviewed and paid invoices and performed general administration of the Receivership; and

k) prepared this Second Report.

SALE OF THE HIGHVIEW PROPERTY

<u>Sale Transaction Closing</u>

15. Pursuant to the terms of the purchase and Sale Agreement, the Sale Transaction was to close within five days of the granting of the Approval and Vesting Order.

16. On November 1, 2019, the Purchaser of the Highview Property requested an extension of the closing date for the Sale Transaction to November 5, 2019, which was agreed to by the Receiver.

17. On November 5, 2019, the Receiver closed the Sale Transaction and confirmed that its counsel had received the Net Sales Proceeds totalling $5,095,081.

18. Summarized below is the executed seller's statement of adjustments (the "**Statement of Adjustments**"), a copy of which is attached hereto as **Appendix "A"**:

Sale price per the Sale Agreement	$5,260,000
Commission due to the Receiver's real estate agents	($103,660)
Commission due to the Purchaser's real estate agents	($66,230)
Adjustment due to portion of City of West Vancouver taxes paid by the Receiver	$4,971
Sales proceeds received by the Receiver	**$5,095,081**

19. The adjustments contained in the Statement of Adjustments are comprised of the following:

a) sales commission due to the Receiver's real estate agents in the amount of $98,725, plus GST in the amount of $4,935, pursuant to the Sales Agreement;

b) sales commission due to the Purchaser's real estate agents in the amount of $63,076 plus GST in the amount of $3,154, pursuant to the Sales Agreement; and

c) an adjustment of $4,971 representing 57 days of the 2020 City of West Vancouver tax cycle paid by the Receiver.

<u>Priority Payments made from the Net Sales Proceeds</u>

20. Upon completion of the Sale Transaction, the Receiver directed and authorized its counsel to make certain payments from the Net Sales Proceeds prior to transferring the remaining proceeds (the "**Remaining Proceeds**") to the Receiver. Attached hereto as **Appendix "B"** is the Executed Authorization and Direction to Pay which is summarized below:

Sale proceeds received by the Receiver's legal counsel	$5,095,081
Payment to Robert J. Ellis, in trust for BMO for the secured mortgage, and accrued interest	($2,250,356)
Payment to the Corporation of the District of West Vancouver	($1,412)
Payment to the Receiver's legal counsel for holdback for final utilities	($500)
Payment to the Receiver's legal counsel for holdback for speculation and vacancy tax	($41,200)
Remaining Proceeds payable to the Receiver	**$2,801,613**

21. The adjustments to the Net Sales Proceeds as detailed above are comprised of the following:

a) payment to Robert J. Ellis, in trust for BMO, the sum of $2,250,356, comprised of the following:

i. principle and accrued interest for all outstanding amounts owed by the Company and secured by the mortgage in favour of BMO and registered against title to the lands under registration number CA3233157 in the amount of $2,243,079; and

ii. legal and property manager fee's incurred by BMO in the amount of $7,277; and

b) payment to the Corporation of the District of West Vancouver the sum of $1,412, comprised of the following:

i. outstanding property taxes payable in the amount of $128;

ii. outstanding utilities payable in the amount of $909; and

iii. outstanding fees payable for municipal tickets in the amount of $375 relating to security alarm triggers at the Highview Property; and

c) payment to the Receiver's legal counsel in the amount of $500, held in trust for final payment of utilities up to the Completion Date; and

d) payment to the Receiver's legal counsel for $41,200, held in trust for payment of speculation and vacancy tax incurred on the property for 2018 taxation year.

22. On November 8, 2019, the Remaining Proceeds of $2,801,612 were paid to the Receiver.

REPAYMENT OF RECEIVERSHIP BORROWING

23. On October 29, 2019 this Honourable Court granted an order increasing the Receiver's Borrowing Charge from $400,000 to $650,000. This was granted on the basis that should the sale of the Highview Property not close, the Receiver would require additional funds in order continue to market and sell the Highview Property. As the Sales Transaction closed on November 5, 2019, the Receiver has not borrowed any additional funds.

24. On November 29 2019, the Receiver repaid the Bankruptcy Estate a total of $408,788 representing the repayment of the original $400,000 loan, plus interest of $8,788 pursuant to the Receiver's Certificate.

UPDATE ON POTENTIAL PREFERENCES AND TRANSFERS AT UNDERVALUE

<u>Tian Li</u>

25. On November 27, 2017, Yang, on behalf of the Company, purchased a bank draft drawn from the Company's bank account in the amount of $50,000 (the "**Bank Draft**"), that was payable to Tian Li.

26. On April 2, 2018, Tian Li deposited the Bank Draft into her own account (the "**Li Payment**"). It does not appear that Tian Li provided any consideration to the Company in exchange for the Li Payment.

27. On October 29, 2019, the Receiver delivered to Tian Li a written demand requesting that Tian Li return the Li Payment to the Receiver within 10 days (the "**Tian Li Demand**"). A copy of the Tian Li Demand is attached at **Appendix "C"**.

28. On November 22, 2019, and there being no response to the Tian Li Demand, the Receiver filed a Notice of Civil Claim ("**NOCC**") in order to pursue recovery of the Li Payment. A copy of the NOCC is attached at **Appendix "D"**.

29. On December 7, 2019 and December 17, 2019, the Receiver's legal counsel arranged for a process server (the "**Process Server**") to attempt service of the NOCC on Tian Li at two separate addresses. The Process Server was unable to locate Tian Li, and subsequently provided the Receiver's legal counsel with an Affidavit of Attempted Service (the "**Affidavit of Attempted Service**"). A copy of the Affidavit of Attempted Service is attached hereto at **Appendix "E"**.

30. The Receiver is currently working with its legal counsel, PTI, and various third parties in order to obtain further information with respect to the whereabouts of Tian Li and determine the next steps with respect to service of the NOCC.

<u>Luming (Cathy) Zhu</u>

31. On July 31, 2013, Yang, on behalf of the Company, caused a payment of $63,703 ($48,473 USD) to be made to her daughter, Ms. Luming (Cathy) Zhu (the "**PE Zhu Payment**"). Yang also made several other payments to Ms. Zhu between 2013 and 2018 from her own accounts totalling $958,234 for total payments to Ms. Zhu of $1,021,838 during this period.

32. Payments made by Yang directly to Ms. Zhu are being pursued by the Trustee and are not discussed further in this Second Report.

33. Ms. Zhu is a resident of New York, New York, United States.

34. On or around May 23, 2019, PTI, through its US counsel, and in consultation with the Receiver and the Trustee of the Bankruptcy Estate, wrote to Ms. Zhu demanding that the funds be returned to the Trustee and Receiver.

35. Between June 26, 2019 and September 23, 2019, PTI's US counsel, in consultation with the Receiver and the Trustee, negotiated a full and final settlement with Ms. Zhu of their respective claims pertaining to the PE Zhu Payment (the "**Zhu Settlement**").

36. Pursuant to the terms of the Zhu Settlement, Ms. Zhu paid the Receiver the sum of $24,579 (the "**PE Zhu Settlement Amount**") on **December 11, 2019.**

37. The Receiver reviewed the terms of the Zhu Settlement, including the PE Zhu Settlement Amount, and determined that it was appropriate and reasonable in the circumstances. In reaching this conclusion, the Receiver considered, among other things, the following factors:

a) Ms. Zhu is a lawyer residing in the United States and, while the costs of a contested trial in the United States are unknown, they are likely to exceed the difference between the PE Zhu Payment and the PE Zhu Settlement Amount; and

b) PTI, the primary creditor of the Company and of the Bankruptcy Estate, both participated in the negotiations of, and supported, the Zhu Settlement.

UPDATE ON FILING OF THE COMPANY'S TAX RETURNS

38. On March 13, 2020, the Receiver's internal tax professionals completed and filed the PE Tax Returns from the date of its inception in 2011 to 2019.

39. As described in the First Report, the Receiver does not expect that, following the filing the PE Tax Returns, any taxes will be payable by the Company for the following reasons:

a) the Company does not appear to have ever carried on business and, in any event, never generated a profit; and

b) the sale proceeds generated by the Sale Transaction were not in excess of the Highview Property's adjusted cost base of the land and building situated thereon.

UPDATE ON THE FORMER RECEIVER'S ACCOUNTS AND FEES

40. On December 23, 2019, the Receiver filed its response to the Former Receiver's Taxation Application.

41. A pre-hearing conference was held on February 28, 2020 (the "**Pre-Hearing Conference**") for the purpose of resolving various preliminary issues related to the Former Receiver's Taxation Application including, *inter alia*, issues raised by the Former Receiver and its counsel relating to PTI's standing to participate in and respond to the Former Receiver's Taxation Application.

42. At the Pre-Hearing Conference, the Former Receiver's counsel confirmed that the Former Receiver was no longer taking the position that PTI did not have standing to participate in the Former Receiver's Taxation Application, but indicated that the outcome of the substantive hearing should be binding on all parties.

43. The presiding Registrar of the Pre-Hearing Conference expressed concern that, if the outcome of the Former Receiver's Taxation Application is to be binding on all parties, then:

    a) all potential stakeholders, including CRA and the Office of the Superintendent of Bankruptcy, had to be served with the Former Receiver's Taxation Application;

    b) the parties ought to determine whether any additional creditors/third-parties ought to be served with the Former Receiver's Taxation Application; and

c) once the parties have completed service of the Former Receiver's Taxation Application, a further pre-hearing conference ought to be scheduled, on notice to all potential stakeholders, to resolve any extant issues regarding the taxation process.

44. The Former Receiver's counsel is in the process of drafting an order reflecting the directions of the Registrar that were made at the Pre-Hearing Conference.

PROPOSED CLAIMS PROCESS

45. At this juncture, the Receiver is of the view that the Proposed Claims Process is required to, *inter alia*, enable the Receiver to identify, evaluate and determine the Claims of creditors of the Company, and their respective entitlement to the proceeds from the assets of the Company. The Proposed Claims Process will also assist the Receiver, the Former Receiver, and PTI in determining whether there are any additional stakeholders that need to be served with, and be given an opportunity to both respond to and participate in, the Former Receiver's Taxation Application in accordance with the direction of the Registrar that was made at the Pre-Hearing Conference.

46. Capitalized terms describing the Proposed Claims Process, and as set out below, shall have the meaning ascribed to them in the Proposed Claims Process Order.

<u>Summary</u>

47. In connection with the Proposed Claims Process, the Receiver has filed a notice of application for the purpose of obtaining the Proposed Claims Process Order

48. The purpose of the Proposed Claims Process is to, *inter alia*:

a) determine whether any Creditors have secured Claims against the assets of the Company;

b) determine whether any Creditors have unsecured Claims against the assets of the Company;

c) provide known Creditors of the Company with the Claims Package;

d) require all Creditors to file a Proof of Claim with the Receiver by the Claims Bar Date;

e) provide the Receiver with the ability to revise and/or disallow Proofs of Claim by issuing Creditors with a Notice of Revision or Disallowance ("**NORD**"); and

f) allow Creditors the opportunity to dispute any NORD issued by the Receiver, and provide a mechanism for resolving such disputes.

49. Pursuant to the terms of the Proposed Claims Process Order, the failure of a Creditor to file a Proof of Claim by the Claims Bar Date and, as applicable, a Notice of Dispute ("**NOD**"), within the time stipulated in the Claims Process Order will result in the occurrence of one the following, as applicable:

a) the Claim shall be deemed to have been accepted for all purposes at the amount and categorization set out in the admitted/accepted Proof of Claim;

b) the Claim shall be deemed to be the Claim as set out in the NORD;

c) the Receiver's NORD in respect of such creditor's Claim shall be final and binding on all persons and there shall be no further right to appear, review or recourse to this Court or any other Court or tribunal in respect of the Receiver's NORD; and

d) all other Claims of such Creditor, if any, shall be forever extinguished and barred.

Creditor Notification

50. The Proposed Claims Process Order sets out the following timelines for notifying Creditors of the Proposed Claims Process:

a) forthwith and in any event within three (3) business days following the date of the pronouncement of the Proposed Claims Process Order, the Receiver will mail a Claims Package (comprised of an Instruction Letter and a Proof of Claim, the forms of which are attached as schedules to the Proposed Claims Process Order) to each known Creditor;

b) forthwith and in any event within two (2) business days following the pronouncement of the Proposed Claims Process Order, the Receiver will post the Proposed Claims Process Order and related documents on its website; and

c) forthwith and in any event within four (4) business days following the pronouncement of the Proposed Claims Process Order, the Receiver shall take necessary steps to cause a notice of the Proposed Claims Process to be published for one (1) business day in the Vancouver Sun (the "**Newspaper Notice**").

Proposed Timeline

51. Should this Honourable Court grant the Proposed Claims Process Order, the timeline of the Proposed Claims Process are as follows:

Activity	Deadline
Court approval of the Proposed Claims Process	July 29, 2020
Receiver to post Proposed Claims Process documents to its website	On or before July 31, 2020
Receiver to mail Proposed Claims Process documents to known Creditors	On or before August 4, 2020
Receiver to publish Newspaper Notice	On or before August 5, 2020
Claims Bar Date	August 27, 2020
Deadline for the Receiver to send a NORD	On or before September 28, 2020
Deadline for persons to object a NORD in the form of a completed NOD	10 days after receipt of the NORD

Claims Bar Date

52. It is the view of the Receiver that the Claims Bar Date is reasonable and appropriate for, *inter alia*, the following reasons:

a) as discussed in the First Report, there are minimal books and records of the Company and a claims process is required to accurately identify known Creditors, the amounts owing to those Creditors and the characterization of such Claims;

b) Creditors that do not receive a Claims Package will have approximately forty-five days to file a Proof of Claim. They will be advised of the Proposed Claims Process through:

i. the Newspaper Notice, which will advertise the Proposed Claims Process in the jurisdiction where the Company operated; and

ii. the posting of the Proposed Claims Process Order, and related materials (including the Claims Package) on the Receiver's website.

53. The Receiver anticipates that the majority of the Creditors are already known to the Receiver, and therefore will receive a Claims Package following the pronouncement of the Proposed Claims Process Order, as the Company had minimal operations and has been in Receivership for approximately twenty months.

54. Accordingly, it is the Receiver's view that the Proposed Claims Process will provide Creditors with sufficient and timely notice to allow them to submit a Proof of Claim prior to the Claims Bar Date.

RECEIPTS AND DISBURSEMENTS

55. Attached hereto as **Appendix "F"** to this Second Report is the SRD for the period of December 10, 2018 to June 6, 2020 (inclusive) (the "**R&D Period**").

56. The SRD reflects actual cash receipts and disbursements, and has not been prepared on an accrual basis.

57. Cash on hand as at June 12, 2020 was $2,165,946. Cash received during the R&D Period totalled $3,283,835. This amount is comprised of the following receipts and is summarized as follows in the table below:

Description	Amount	Receiver's Comments
Receipt of Remaining Proceeds	$2,801,613	Net sales proceeds of $5,095,081 less the mortgage repayment and other adjustments as described above.
Borrowings under a Receiver's Certificate	$399,408	Borrowing in the amount of $399,407 ($400,000 less $593 in bank fees) was funded by the Bankruptcy Estate pursuant to the Receiver's Borrowing Charge, as defined in the Amended

		and Restated Receivership Order, pursuant to Receiver's Certificate 1 dated January 14, 2019
Interest Allocation	16,114	Interest earned over the period
Refund of insurance - Highview Property	3,288	Refund from BCAA for prepaid house insurance in 2017
Refund of Insurance - BMW	1,020	Refund from ICBC for prepaid insurance on the BMW
Sale of Vehicle - BMW	32,484	Sales proceeds from the sale of the BMW
Luming Zhu Settlement	24,579	PE Zhu Settlement
Vacancy Tax Holdbacks	5,329	Return of the balance of vacancy tax holdbacks from sale of the Highview Property
Total	**$3,283,835**	

58. Disbursements during this period totalled $1,117,889 and are summarized as follows in the table below:

Description	Amount	Receiver's Comments
Bank Charges and other fees	$94	
Construction/Remediation Costs	392,397	Payments to the Restoration Company for the Restoration Services excluding taxes. This amount includes the $50,000 retainer previous provided to the Restoration Company which was applied to its final invoice.
General & Administration	5,631	Payments for utilities, security, alarm services, and other administrative charges
GST on Disbursements	19,629	GST on all disbursements except Legal Fees and Receiver's Fees
Insurance premium refund	10,420	Refund of annual insurance premiums
Interior Design	12,050	Staging of the Highview Property for Sale
Legal Fees (including taxes)	59,270	Legal fees to February 29, 2020 including applicable taxes.
Property taxes	55,616	Property taxes on the Highview Property
Receiver's Fees (including taxes)	153,994	Receiver fees to February 21, 2020 including applicable taxes.

Repayment of Receiver's Certificate Borrowings	408,788	Repayment to the Bankruptcy Estate for $400,000 in principal and $8,788 in interest.
Total	**$1,117,889**	

FEES AND DISBURSEMENTS

59. The Amended and Restated Receivership Order requires the Receiver to pass its accounts from time to time. The accounts of the Receiver are calculated based on hours spent at rates established by each professional based on their qualifications and experience.

60. The Receiver is seeking to have its fees and disbursements for the period from September 28, 2019 to May 15, 2020 passed and approved by this Honourable Court. Copies of the Receiver's invoices in respect of this period are attached hereto as **Appendix "G"**. The appendix includes detailed time descriptions with respect to the activities of and time spent by each employee of the Receiver during this period.

61. The table below provides a summary of the fees for this period:

Ernst & Young Inc.								
Invoice No.	**Date**	**Period Covered**	**Fees**	**Expenses**	**Subtotal**	**Taxes**	**Total**	**Hours**
4445	Nov 26	Sept 28 – Nov 22	27,182	-	27,182	1,359	28,541	72
4757	Mar 2	Nov 23 – Feb 21	47,406	-	47,406	2,370	49,776	133
5139	May 22	Feb 22 – May 15	22,061	-	22,061	1,103	23,164	60
			$96,649	-	**$96,649**	**$4,832**	**$101,481**	**265**

62. During this period, the Receiver billed approximately 265 hours, representing fees and disbursements of $96,649 exclusive of GST. The activities of the Receiver during this period are documented in this Second Report. The work completed by the Receiver was delegated to the appropriate professionals in the Receiver's organization based on seniority and hourly rates. The Receiver's fees are consistent with the fees charged by similar firms.

63. The fees and disbursements of the Receiver's legal counsel, for the period from October 1, 2019 to May 31, 2020 are summarized in **Appendix "H"**. The table below provides a summary of the fees for this period:

Cassels Brock & Blackwell LLP								
Invoice No.	**Date**	**Period Covered**	**Fees**	**Expenses**	**Subtotal**	**Taxes**	**Total**	**Hours**
2095557	Nov 29	Oct 1 – Nov 26	27,670	720	28,390	3,367	31,757	102
2097039	Dec 12	Nov 19 – Nov 30	2,925	135	3,060	367	3,427	10
2100125	Dec 31	Dec 1 – Dec 31	2,777	695	3,472	392	3,864	9
2104584	Mar 9	Jan 1 – Feb 29	2,702	20	2,722	326	3,048	7
2106900	Apr 8	Mar 1 – Mar 31	6,726	-	6,726	807	7,533	17
2109411	May 11	Apr 1 – Apr 30	137	6	143	17	160	1
2111826	Jun 15	May 1 – May 31	600	-	600	72	672	2
			$43,537	**$1,576**	**$45,113**	**$5,348**	**$50,461**	**148**

64. During this period, the Receiver's legal counsel billed approximately 148 hours, representing fees and disbursements of $45,113 exclusive of GST and PST. The Receiver has reviewed and paid all accounts rendered by its legal counsel in this period, and confirms that all services described in the accounts were rendered to the Receiver by its legal counsel, and that the Receiver believes that all charges in the accounts are fair and reasonable and consistent with the market for such legal services in British Columbia.

65. The Receiver is requesting this Honourable Court's approval of the fees and disbursements of the Receiver and Cassels, as described in this Second Report.

RECOMMENDATIONS

66. The Receiver respectfully requests that this Honourable Court pronounce an order approving:

a) the Proposed Claims Process;

b) the Receiver's fees and expenses as outlined herein;

c) the Receiver's legal counsel's fees and disbursements as outlined herein; and

d) the Second Report of the Receiver and its activities to the date hereof.

All of which is respectfully submitted this 15th day of July, 2020.

ERNST & YOUNG INC.
In its capacity as Receiver of
PE Consulting Ltd.
and not in its personal or corporate capacity

Per:

Holly Palmer CPA, CA, CIRP, LIT
Vice President

Appendix A

The Cao Law Corporation
690 999 West Broadway
Vancouver, BC V5Z 1K5

Seller Statement of Adjustments

BUYER:	Yong Ge Zhai and Yang Shao		
SELLER:	Ernest & Young Inc., in its capacity as Receiver - Manager of PE Consulting Ltd.		
PROPERTY:	PID 028-278-038, LOT 16 DISTRICT LOT 793 GROUP 1 NEW WESTMINSTER DISTRICT PLAN BCP45164 2791 Highview Pl, West Vancouver, BC V7S 0A4		
FILE NUMBER:	19288	COMPLETION DATE:	November 5, 2019
ADJUSTMENT DATE:	November 5, 2019	POSSESSION DATE:	November 5, 2019

	DEBIT	**CREDIT**
Price		$5,260,000.00
Commission due to Pacific Place Group - Arc Realty Ltd. of $98,724.00 plus GST of $4,936.20 totaling $103,660.20.	$103,660.20	
Commission due to Royal Pacific Lions Gate Realty Ltd. of $63,076.00 plus GST of $3,153.80 totaling $66,229.80.	$66,229.80	
Buyer's portion of 2019 City of West Vancouver taxes paid by Seller $31,833.92 x 57 / 365 days		$4,971.32
Sub Totals	$169,890.00	$5,264,971.32
Payable to Cassels Brock & Blackwell In Trust	**$5,095,081.32**	
Totals	$5,264,971.32	$5,264,971.32

1. This statement is based on information provided by Provincial and Municipal Offices, Lenders and others. The information is believed to be correct, but its accuracy cannot be guaranteed. Errors and/or omissions discovered after closing shall be adjusted directly between the parties.
2. Where property taxes and/or metered utilities are adjusted on an estimated amount, it represents an amount believed to be accurate on information obtained from the taxing authority and no responsibility is assumed for its correctness. The Seller and Buyer will be responsible for any further adjustment upon receipt of the current Tax Levy Notice and/or utility billing.
3. Any items not specifically adjusted on this statement will be adjusted and settled directly between the parties.
4. Each party shall retain his/her own solicitor or notary public and this transaction shall be completed according to the usual customs and practice of conveyancing solicitors/notaries public (including the use of solicitor or notarial undertakings) in British Columbia for like transactions.
5. The undersigned agree to accept tender by way of trust cheque to be made payable to Cassels Brock & Blackwell, In Trust.

APPROVED and consented to this 5 day of November, 2019.

Ernst & Young Inc. in its capacity as Receiver - Manager of PE Consulting Ltd. by its authorized signatory:

Print Name

Holly Palmer
Print Name

E. & O.E.

Appendix B

AUTHORIZATION AND DIRECTION TO PAY

TO: CASSELS BROCK & BLACKWELL LLP ("**Cassels**")

RE: Sale by Earnst & Young Inc. (the "**Receiver**"), in its capacity as the Court-appointed receiver and manager of PE Consulting Ltd., of 2791 Highview Place, West Vancouver, British Columbia (the "**Property**") to Yong Ge Zhai and Yang Shao (together, the "**Purchasers**")

The undersigned hereby authorizes and directs Cassels to receive funds into its trust account from The Cao Law Corporation ("**Cao Law**"), as solicitors for the Buyer, to complete the captioned transaction and disburse same in accordance with the Order granted by Justice Marchand on October 29, 2019 and more particularly set out in Schedule "A" attached:

1. TO BANK OF MONTREAL ("**BMO**") the total amount due in accordance with the payout statement attached hereto as Schedule "B", plus per diem interest, as required, to payout and discharge the existing financing registered against the Property;

2. TO THE CORPORATION OF THE DISTRICT OF WEST VANCOUVER, the sum of $128.01 representing the outstanding property taxes payable on the Property;

3. TO THE CORPORATION OF THE DISTRICT OF WEST VANCOUVER, the sum of $909.82 representing the outstanding utilities payable on the Property billed up to September 30, 2019;

4. TO THE CORPORATION OF THE DISTRICT OF WEST VANCOUVER, the sum of $375.00 representing the outstanding fees payable for Municipal Tickets related to false alarms on the Property;

5. TO CASSELS BROCK & BLACKWELL LLP, the sum of $500.00 representing the holdback of funds for utilities to be billed by the Corporation of the District of West Vancouver by a special meter reading for utilities up to the completion date together with a special meter reading fee; and 0.5% of the assessed value of the Property to holdback pending determination under the Speculation and Vacancy Tax;

6. TO THE CORPORATION OF THE DISTRICT OF WEST VANCOUVER, the sum payable pursuant to the final invoice issued by the Corporation of the District of West Vancouver for utilities billed up to the completion date together with a special meter reading fee; and

7. TO THE RECEIVER, the balance of the net sale proceeds.

EARNST & YOUNG INC., in its capacity as the Court-appointed receiver and manager of PE Consulting Ltd.
by its authorized signatory:

Authorized Signatory

Schedule "A" to Authorization and Direction To Pay

RECONCILIATION OF FUNDS RECEIVED AND DISBURSED
BY CASSELS

Sale by Ernst & Young Inc. (the "**Receiver**"), in its capacity as the Court-appointed receiver and manager of PE Consulting Ltd., of 2791 Highway Place, West Vancouver, British Columbia (the "**Property**") to Yong Ge Zhai and Yan Shao

DESCRIPTION	**RECEIVED**	**DISBURSED**
FROM: THE CAO LAW CORPORATION (solicitor for purchaser) *Balance due from the Purchaser pursuant to the Statement of Adjustments*	$ 5,095,081.32	0.00
TO: ROBERT J. ELLIS, IN TRUST *(solicitor for Bank of Montreal)* *BMO Legal Costs and Property Manger's Fees*	0.00	$ 7,276.60
TO: ROBERT J. ELLIS, IN TRUST *(solicitor for Bank of Montreal)* *Payout of existing Mortgage CA3233157 and CA3233158*	0.00	$ 2,243,079.28
TO: THE CORPORATION OF THE DISTRICT OF WEST VANCOUVER *Payout of outstanding taxes and utilities due and owing pursuant to a tax certificate dated October 30, 2019*: Total Taxes Owing: $128.01 Utilities Owing under account no. 127484: $909.82 Municipal Tickets Owing: $375.00 $1,412.83	0.00	$ 1,412.83
TO: CASSELS BROCK & BLACKWELL LLP: *Holdback for final meter reading for utilities*	0.00	$ 500.00
TO: CASSELS BROCK & BLACKWELL LLP: *Holdback for pending determination of Speculation and Vacancy Tax calculated at 0.5% of 2018 Assessed Value of the Property* *0.5% of $8,240,000.00 = $41,200.00*	0.00	$ 41,200.00
BALANCE PAYABLE TO ERNST & YOUNG INC.	0.00	$ 2,801,612.61
TOTAL:	$ 5,095,081.32	$ 5,095,081.32

ELLIS, ROADBURG
BARRISTERS & SOLICITORS

200 - 853 RICHARDS STREET,
VANCOUVER, B.C. V6B 3B4

TELEPHONE (604) 669-7131
FAX (604) 669-7684
Email: rjellis@ellisroadburg.com

FILE No.1407.1399

November 4, 2019

Email: ljenns@casselsbrock.com

Cassels Brock
Lawyers
#2200 - 885 West Georgia Street
Vancouver, BC
V6C 3E8

Attention: Jared Enns

Dear Sir/Madam:

Re: In the Matter of Receivership of PE Consulting Ltd.
Supreme Court of B.C. Action No. B-180368, Vancouver Registry

The writer acts for Bank of Montreal with respect to the above noted matter.

I am enclosing my letter to the Registrar of Titles releasing Certificate of Pending Litigation No. CA6935873.

The letter releasing Certificate of Pending Litigation is forwarded to you on your undertaking not to deal with it except to file it in the Land Title Office and that forthwith after filing in the Land Title Office you will provide me with your trust cheque payable to **Robert J. Ellis, in trust** in the amount which will be due to my client, Bank of Montreal, on the date payment is received by the writer. These funds must be received in this office by 2:00 p.m. in order to effectively deal with them that day, otherwise you are required to include an extra day's interest with the payment.

The amount required to pay out Mortgage No.CA3233157 as at November 5, 2019 is $2,249,908.02, calculated as follows:

$2,242,631.42	Balance owing as at November 5, 2019
$ 883.46	Property Manager's charges
$ 6,393.14	Legal Costs (as calculated below)
	$4,865.00 Legal fees
	$ 914.21 Disbursements
	$ 273.38 GST
	$ 340.55 PST
	$6,393.14
$2,249,908.02	

together with a per diem rate of interest of $223.93 thereafter. In order for us to deal with the funds effectively, we must receive the funds by no later than 1:00 p.m. otherwise you will be required to include an additional day of per diem interest.

Upon receipt of the amount required to pay out my client's mortgage, I will forward funds to them on the condition that they will provide me with a Discharge of Mortgage No.CA3233157 which I will then forward to you for your registration at the Land Title Office. If I am unable to provide you with that discharge, I will return the funds to you.

If you are unable to comply with the above undertakings, or if you will not be in a position to file the letter releasing the Certificate of Pending Litigation in the Land Title Office within 10 days of the date of this letter, you should advise the writer by telephone and be prepared to return it forthwith upon demand.

You may directly deposit your trust cheque into the writer's trust account at Bank of Montreal (Robert J. Ellis, Trust Account No. 0759-1047-303).

Forthwith upon deposit, you are to fax/email the following to the writer's office to the attention of Shelly, indicating the file name and number:

1.1 A copy of your trust cheque deposited.

1.2 A copy of the deposit slip stamped by the branch.

Yours truly,

Robert J. Ellis

rje.sj
encls.

ELLIS, ROADBURG
BARRISTERS & SOLICITORS
ASSOCIATES

200 - 853 RICHARDS STREET,
VANCOUVER, B.C. V6B 3B4

TELEPHONE (604) 669-7131
FAX (604)669-7684

FILE No. 1407.1399

November 4, 2019

Registrar of Titles,
Land Title Office,
Suite 300, 88 - 6th Street
New Westminster, B.C.
V3L 5B3

Dear Sir/Madam:

Re: Supreme Court of British Columbia Action No. H-180278
In the matter of Bank of Montreal v. PE Consulting Ltd.
Certificate of Pending Litigation No. CA6935873
Legal Descriptions:

PID: 028-278-038
Lot 16 District Lot 793 Group 1 New Westminster District Plan BCP45164

I hereby certify that as solicitor for Bank of Montreal, I caused an action to be commenced in the Supreme Court of British Columbia, Vancouver Registry, and obtained a Certificate of Pending Litigation in this action, which was registered on July 17, 2018 under No. CA6935873.

I further certify that I am and remain the solicitor for Bank of Montreal and that the Supreme Court of British Columbia Action No. H-180278 has been neither discontinued nor dismissed.

This letter will constitute your full and sufficient authority to cancel the registration of the Certificate of Pending Litigation.

Yours truly,

Robert J. Ellis

rje.sj

THE CORPORATION OF THE DISTRICT OF WEST VANCOUVER
PROPERTY TAX CERTIFICATE

750 17th St.
West Vancouver BC V7V 3T3

Printed: Oct 30, 2019
Number: 66721

Phone: (604) 925-7032
www.westvancouver.ca

This statement is issued in accordance with Local Government Act Section 383- Statement of Taxes Outstanding. Under 383(3), an error in a statement or certificate given under this section does not subject the municipality to damages. THIS PROPERTY MAY BE SUBJECT TO OTHER CHARGES OR FEES.

For BC ONLINE

Owner

PE CONSULTING LTD.

Property

Folio: 25-0400-000-016 **LTO No.:** CA2325583
Pid: 028-278-038 **MHR No.:**

Civic: 2791 HIGHVIEW PLACE
Legal: LOT 16 DISTRICT LOTS 793 AND 816 GROUP 1 NEW WESTMINSTER DISTRICT PLAN BCP45164

2019 Assessments

Value Set	Assessment Class	Value Type	Land	Improvements	Total
GENERAL	Residential	NET	4,744,000	2,286,000	7,030,000

2019 Levies, Grants, Deferrals

Total Levy	**31,833.92**
Grant Available	
65 and over	0.00
Under 65	0.00
Grant Claimed	**0.00**
Deferred	**0.00**

Property Taxes Owing As At Oct 30, 2019

Delinquent (2017)	0.00
Arrears (2018)	0.00
Interest to Oct 30, 2019	0.00
Current (2019)	121.91
	121.91
Penalties	6.10
Total Taxes Owing	**128.01**

2020 Instalments

Payments Made	0.00
Interest Earned	0.00
Adjustments	0.00
Balance as at Oct 30, 2019	**0.00**

Utility Account Number 127484

Unpaid Arrears	0.00
Balance of Last Bill - Due **Nov 29, 2019**	1,010.91
Remaining Discount - available until Nov 29, 2019	-101.09
Account Balance as at Oct 30, 2019	**909.82**

Details of Last Bill

Charges on Last Bill			1,010.91
Total Discount	101.09	Claimed	0.00
Payments Applied			0.00
Penalties			0.00
Adjustments			0.00

Account Type	RES-SINGLE
Number of Unit(s) on Premises	1
Billing Category	METERED

QUARTERLY METERED UTILITY CHARGES FOR:

Date	Description	Amount	Discount Available	Units	Consumption
Jul 01, 2019 TO Sep 30, 2019					
Sep 30, 2019	BASE WATER RES SINGLE 025MM	76.12	7.61	1.00	
Sep 30, 2019	METERED WATER RES SINGLE	705.78	70.58	1.00	313.00 CUBIC ME
Sep 30, 2019	BASE LOCAL SEWER RES SINGLE	16.57	1.66	1.00	
Sep 30, 2019	METERED LOCAL SEWER RES SINGLE	2.06	0.21	1.00	1.95 CUBIC METR
Sep 30, 2019	BASE REGIONAL SEWER RES SINGLE	23.29	2.33	1.00	
Sep 30, 2019	METERED REGIONAL SEWER RES SINGLE	2.90	0.29	1.00	1.95 CUBIC METR
Sep 30, 2019	DRAINAGE LEVY RES SINGLE	117.14	11.71	1.00	
Sep 30, 2019	GARBAGE/ORGANICS	50.24	5.02	1.00	
Sep 30, 2019	PUBLIC SPACE REFUSE FEE	11.81	1.18	1.00	
Sep 30, 2019	RECYCLING CURBSIDE	5.00	0.50	1.00	

Municipal Tickets

Ticket/Invoice	Dated	Description	Amount
F1906686	Jun 11, 2019	SECOND FALSE ALARM	100.00
F1906690	Jun 12, 2019	THIRD FALSE ALARM	125.00
F1906807	Jun 14, 2019	FOURTH FALSE ALARM	150.00
		Total Charges	**375.00**

Important Property Comments

PENALTY — All property tax payments received after July 2, 2019 are subject to a 5% penalty. An additional 5% penalty is also applied if there is an outstanding balance as of Sept 3, 2019.

UTILITY — SPECIAL METER READINGS - Upon request West Vancouver will provide a final bill by way of a special meter reading. For a request form, please visit westvancouver.ca/utilities and download from the Special Meter Reading Form.

There may be other outstanding charges relating to this property for enquiries please contact 604-925-7091.

Assessment Roll Report

Disclaimer

This information is obtained from various sources and is determined as of the specific dates set out in the Assessment Act. As a result, BC Assessment cannot warrant that it is current or accurate, and provides it for your convenience only. Use of this information without verification from original sources is at your own risk.

©BC Assessment

Report Date:	Nov 06, 2019	**Report Time:**	11:24:50 AM
Folio:	025522-00017	**For:**	PI49040
Roll Year:	2019	**Roll Number:**	25-0400-000-016
Area:	08	**Jurisdiction:**	328
School District:	45		
Neighbourhood:	025 - WENTWORTH-CYPRESS BOWL		
Property Address:	2791 HIGHVIEW PL WEST VANCOUVER BC V7S 0A4		

Owner Name: PE CONSULTING LTD **# of Owners:** 1
Owner Address: ATTN RECEIVER OF PE CONSULTING LTD 700 GEORGIA ST W PO BOX 10101 VANCOUVER BC V7Y 1C7

Document No: D0001387JM
PID: 028-278-038
Legal Description: Lot 16, Plan BCP45164, District Lot 793, Group 1, New Westminster Land District, & DL 816

2019 Value

Property Class	Land	Improvement
Residential	$4744000	$2286000

Total Actual Value: $7030000

2018 Value

Property Class	Land	Improvement
Residential	$5930000	$2310000

Total Actual Value: $8240000

2017 Value

Property Class	Land	Improvement
Residential	$5040000	$3316000

Total Actual Value: $8356000

Manual Class: 8000 - Non-Manualized Structures
Actual Use: 000 - Single Family Dwelling
Tenure: 01 - Crown-Granted
ALR:
Land Dimension: 19392 **Land Dimension Type:** Square Feet

Sales: Number	Description
#1	A SINGLE PROPERTY, VACANT SALE occurred on 22 Dec 2011. This was a CASH sale and the price was 2,388,000. The document # was CA2325583.
#2	A NON-SALE occurred on 22 Jun 2010. The document # was BB1163330.

Additional Owners: **Associated PIDs:**

No Additional Owners

Appendix C

Cassels

October 29, 2019

jenns@cassels.com
tel: +1 778 372 6787
fax: +1 604 691 6120

VIA COURIER

Tian Li
401 - 7275 Salisbury Avenue
Burnaby, BC V5E 4E1

Dear Sir or Madam:

Re: PE Consulting Ltd. ("PE") – Bank Draft #021131811

We are counsel to Ernst & Young Inc. in its capacity as receiver and licensed insolvency trustee (the "**Receiver**") of the estate of PE. A copy of the order appointing the Receiver is enclosed.

On April 2, 2018, you cashed bank draft #021131811 from PE with a value of $50,000 (the "**Funds**"). This was a transfer for no consideration. This transfer represents a fraudulent preference under sections 3 and 4 of the *Fraudulent Preference Act*, RSBC 1996, c. 164 and/or a fraudulent conveyance under section 1 of the *Fraudulent Coveyance Act*, RSBC 1996, c. 163 (together, the "**Acts**").

As such, pursuant to the Acts and the relevant jurisprudence, you have no contractual right to the Funds as the Funds are considered property of PE.

This letter is to advise you that unless payment of the Funds is received by way of certified cheque, bank draft or money order made payable to Cassels Brock & Blackwell LLP in trust, within 10 days from the date hereof, our client has instructed that all necessary steps to recover the Funds will be taken without further notice. If the Receiver is required to bring an action, it will be seeking costs against you on a full indemnity basis.

All enquiries and payments should be directed to the attention of the writer.

We trust the foregoing is in order.

Yours truly,
Cassels Brock & Blackwell LLP

Jared Enns
Associate

Appendix D

SUPREME COURT
OF BRITISH COLUMBIA
VANCOUVER REGISTRY

NOV 2 2 2019

S1913340

NO.
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

ERNST & YOUNG INC., in its capacity as receiver and licensed insolvency trustee of the estate of PE Consulting Ltd.
(and not in its personal capacity)

PLAINTIFF

AND:

TIAN LI also known as LIPING TIAN also known as LI PING TIAN

DEFENDANT

NOTICE OF CIVIL CLAIM

This action has been started by the Plaintiff for the relief set out in Part 2 below.

If you intend to respond to this action, you or your lawyer must:

(a) file a Response to Civil Claim in Form 2 in the above-named registry of this court within the time for response to civil claim described below, and

(b) serve a copy of the filed Response to Civil Claim on the Plaintiff.

If you intend to make a counterclaim, you or your lawyer must:

(a) file a Response to Civil Claim in Form 2 and a Counterclaim in Form 3 in the above-named registry of this court within the time for response to civil claim described below, and

(b) serve a copy of the filed Response to Civil Claim and Counterclaim on the Plaintiff and on any new parties named in the Counterclaim.

JUDGMENT MAY BE PRONOUNCED AGAINST YOU IF YOU FAIL to file the Response to Civil Claim within the time for response to civil claim described below.

Time for Response to Civil Claim

A response to civil claim must be filed and served on the Plaintiff:

(a) if you were served with the Notice of Civil Claim anywhere in Canada, within 21 days after that service;

(b) if you were served with the Notice of Civil Claim anywhere in the United States of America, within 35 days after that service;

(c) if you were served with the Notice of Civil Claim anywhere else, within 49 days after that service; or

(d) if the time for response to civil claim has been set by order of the court, within that time.

CLAIM OF THE PLAINTIFF

PART 1: STATEMENT OF FACTS

I. Background

(i) The parties

1. The Plaintiff, Ernst & Young Inc. ("**EY**"), is the duly appointed receiver and receiver manager, without security, of all of the assets, undertakings and property (the "**Property**") of PE Consulting Ltd. (the "**Company**") acquired for, or used in relation to the business carried on by the Company (and in such capacity, the "**Receiver**").

2. The Defendant, Tian Li also known as Liping Tian also known as Li Ping Tian, is an individual with a mailing address located at #401 – 7275 Salisbury Avenue, Burnaby, British Columbia.

(ii) Proceedings against the Company's former director

3. At all material times, Jizhe Yang (also known as Mary Yang) ("**Yang**"), was the sole director, officer, and shareholder of the Company.

4. On or about November 18, 2015, Prima Technology, Inc. ("**PTI**") obtained a judgment against Yang (and others) in the State of Washington in the amount of approximately $11.4 million USD (the "**Washington Judgment**").

5. On or about December 16, 2016, and by order of the Supreme Court of British Columbia (the "**BC Enforcement Order**"), the Washington Judgment was declared recognizable and enforceable in this Honourable Court in the amount of $15.7 million CAD (the "**Judgment Amount**").

(iii) Yang's Assignment into Bankruptcy

6. On May 4, 2018, Yang filed an assignment in bankruptcy and G. Powroznik Group Inc. ("**GPGI**") was appointed as Yang's trustee-in-bankruptcy (and in such capacity, the "**Former Trustee**").

7. Prior to Yang's assignment into bankruptcy, PTI had commenced various enforcement proceedings pursuant to the BC Enforcement Order against Yang.

8. However, and as at May 4, 2018, PTI had only recovered a fraction of the Judgment Amount.

9. PTI is Yang's primary creditor.

(iv) The Receivership of the Company

10. On June 8, 2018, GPGI sought and obtained a receivership order (the "**Receivership Order**"), pursuant to which GPGI was appointed as the receiver of the Company (and, in such capacity, the "**Former Receiver**").

11. On December 10, 2018, PTI obtained an order pursuant to which the Receivership Order was amended and EY was appointed as the Receiver in place of GPGI (the "**Amended Receivership Order**").

II. The Payment

12. On or about November 27, 2017, Yang, on behalf of the Company, purchased a bank draft drawn from the Company's bank account identified as #021131811, in the amount of $50,000.00 (the "**Bank Draft**"), that was payable to the order of the Defendant.

13. Yang, on behalf of the Company, delivered the Bank Draft to the Defendant (the "**Payment**").

14. On or about April 2, 2018, the Defendant deposited the Bank Draft into its own account.

15. The Defendant did not provide any consideration to the Company in exchange for the Payment.

III. The Payment was made in Breach of Yang's Fiduciary Duties

16. At the time that the Payment was made, Yang owed a fiduciary duty to the Company as its director.

17. Yang fraudulently and dishonestly caused the Company to make the Payment to the Defendant.

18. At all material times, the Defendant knew or ought to have known that Yang owed a fiduciary duty to the Company.

19. At all material times, the Defendant knew or ought to have known that the Payment was made by the Company, yet the Company did not, and was not intended to, receive any benefit or consideration of any kind.

20. The Defendant participated in and assisted Yang's breach of fiduciary duties and fraudulent and dishonest conduct.

IV. The Payment was a Fraudulent Preference and/or a Fraudulent Conveyance

21. The Payment was made at a time when the Company was insolvent or unable to pay its debts in full, and/or Yang knew that she and the Company were on the eve of insolvency, and was made to the Defendant, and the Defendant knew or ought to have known that the Payment was made:

    (a) with the intent to defeat, hinder, delay or prejudice the creditors of the Company (and Yang, as the case may be); and

    (b) with the intention of giving the Defendant a preference over the Company's creditors (and Yang's creditors, as the case may be).

22. In addition, and/or in the alternative, the Payment was made to the Defendant, and the Defendant knew or ought to have known that the Payment was made, with the intention to delay, hinder, and/or defraud the Company's creditors of their just and lawful remedies, and was not a disposition for good consideration or in good faith lawfully transferred to a person who, at the time of the Payment, had no notice or knowledge of collusion or fraud.

V. Demands for repayment

23. On or about October 29, 2019, the Plaintiff delivered to the Defendant a written demand requesting that the Defendant return the Payment to the Receiver within 10 days (the "**Demand**").

24. The Defendant has refused, neglected or otherwise failed to return any or all of the Payment, despite the Demand, which is a debt due and owing by the Defendant.

PART 2: RELIEF SOUGHT

1. The Plaintiff claims against the Defendant as follows:

    (a) a declaration that the Payment constitutes a fraudulent preference and is therefore void and of no effect as against the Receiver and the Company's creditors;

    (b) in addition and/or in the alternative, a declaration that the Payment constitutes a fraudulent conveyance and is therefore void and of no effect as against the Receiver and the Company's creditors;

    (c) an accounting of the Payment made to the Defendant;

    (d) judgment against the Defendant in the amount of $50,000.00;

    (e) interest pursuant to the *Court Order Interest Act*, RSBC 1996, c. 79;

    (f) costs; and

    (g) such further and other relief as this Honourable Court deems just.

PART 3: LEGAL BASIS

1. The Receiver is authorized to commence these proceedings pursuant to the provisions of the Amended Receivership Order.

2. The Payment was made at a time when the Company was insolvent and/or unable to pay its debts in full, and/or Yang knew that the Company was on the eve of insolvency,

and the Payment was made, and the Defendant knew or ought to have known that the Payment was made:

(a) with the intent to defeat, hinder, delay or prejudice the creditors of the Company; and

(b) to the Defendant with the intention of giving the Defendant a preference over the Company's creditors.

3. The Payment was therefore a fraudulent preference pursuant to the provisions of the *Fraudulent Preference Act*, RSBC 1996, c. 164, and is therefore void as against the Receiver and the Company's creditors.

4. In addition, and/or in the alternative, the Payment was made, and the Defendant knew or ought to have known that the Payment was made, with the intention to delay, hinder, and/or defraud the Company's creditors of their just and lawful remedies and was not a disposition for good consideration or in good faith lawfully transferred to a person who, at the time of the Payment, had no notice or knowledge of collusion or fraud.

5. The Payment was therefore a fraudulent conveyance pursuant to the provisions of the *Fraudulent Conveyance Act*, RSBC 1996, c. 163, and is therefore void as against the Receiver and the Company's creditors.

6. Accordingly, and in particular, the Plaintiff pleads and relies upon:

(a) the provisions of the *Fraudulent Preference Act*, RSBC 1996, c. 164, and in particular section 3 thereof;

(b) the provisions of the *Fraudulent Conveyance Act*, RSBC 1996, c. 163, and in particular section 1 thereof; and

(c) the law of fraudulent preferences and the law of fraudulent conveyances.

Plaintiff's address for service:

Cassels Brock & Blackwell LLP
2200 HSBC Building
885 West Georgia Street
Vancouver, BC V6C 3E8

Fax number address for service (if any) 604.691.6120

E-mail address for service (if any) jenns@cassels.com

Place of trial: Law Courts
800 Smithe Street
Vancouver, British Columbia

The address of the registry is: Law Courts
800 Smithe Street
Vancouver, BC V6Z 2E1

Date: November 22, 2019

Signature of Lawyer for the Plaintiff
Cassels Brock & Blackwell LLP
(Jared Enns)

Rule 7-1(1) of the Supreme Court Civil Rules states:

> (1) Unless all parties of record consent or the court otherwise orders, each party of record to an action must, within 35 days after the end of the pleading period,
>
> (a) prepare a list of documents in Form 22 that lists
>
> (i) all documents that are or have been in the party's possession or control and that could, if available, be used by any party at trial to prove or disprove a material fact, and
>
> (ii) all other documents to which the party intends to refer at trial, and
>
> (b) serve the list on all parties of record.

APPENDIX

PART 1: CONCISE SUMMARY OF NATURE OF CLAIM:

ERNST & YOUNG INC., in its capacity as receiver and licensed insolvency trustee (and in such capacity, the "**Receiver**") of the estate of PE Consulting Ltd. (the "**Company**") (and not in its personal capacity) has commenced this claim against the Defendant for a declaration that a payment in the amount of $50,000 (the "**Payment**"), which was made to the Defendant (i) on behalf of the Company by the Company's former director and (ii) for no consideration, was a fraudulent preference and/or a fraudulent conveyance. The Receiver also seeks, among other things, an accounting of the Payment made to the Defendant and judgment against the Defendant in the amount of $50,000.00.

PART 2: THIS CLAIM ARISES FROM THE FOLLOWING:

A personal injury arising out of:

- [ ] a motor vehicle accident
- [ ] medical malpractice
- [ ] another cause

A dispute concerning:

- [ ] contaminated sites
- [ ] construction defects
- [ ] real property (real estate)
- [ ] personal property
- [ ] the provision of goods or services or other general commercial matters
- [ ] investment losses
- [ ] the lending of money
- [ ] an employment relationship
- [ ] a will or other issues concerning the probate of an estate

- [x] a matter not listed here

PART 3: THIS CLAIM INVOLVES:

- [ ] a class action
- [ ] maritime law
- [ ] aboriginal law
- [ ] constitutional law
- [ ] conflict of laws
- [x] none of the above
- [ ] do not know

PART 4:

Court Order Interest Act, RSBC 1996, c 79

Appendix E

NO. S1913340
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

ERNST & YOUNG INC., in its capacity as receiver and licensed insolvency trustee of the estate of PE Consulting Ltd. (and not in its personal capacity)

PLAINTIFF

AND:

TIAN LI also known as LIPING TIAN also known as LI PING TIAN

DEFENDANT

AFFIDAVIT OF ATTEMPTED SERVICE

I, **AMERRITPAL MANDER**, process server, of 1230 – 777 Hornby Street, in the City of Vancouver, in the Province of British Columbia; **MAKE OATH AND SAY AS FOLLOWS:**

1. I am a process server, and as such have personal knowledge of the facts and matters hereinafter deposed to save and except those which are based on information and belief, and as to such matters I verily believe them to be true.

2. My colleague Carrie-Lee Godfrey and I were instructed by our client Cassels Brock & Blackwell LLP of 2200 – 885 West Georgia Street, Vancouver, BC, to serve **TIAN LI also known as LIPING TIAN also known as LI PING TIAN** (hereinafter referred to as "**TIAN LI**") at the address 3901 – 1189 Melville Street, Vancouver, BC (hereinafter referred to as the "Melville Street address"), and at the address 401 – 7275 Salisbury Avenue, Burnaby, BC (hereinafter referred to as the "Salisbury Avenue address") with the following documents that have been filed in this proceeding:

NOTICE OF CIVIL CLAIM, bearing court stamp dated November 22nd, 2019.

3. My colleague Carrie-Lee Godfrey informed me, and I verily believe that she attended at the Melville Street address on December 7th, 2019 at 2:40pm, at which time she found that the building was locked and secure requiring a FOB for access, and **TIAN LI** was not listed in the intercom directory. She posted a message with her contact information on the lobby door for **TIAN LI** to contact her.

4. My colleague Carrie-Lee Godfrey informed me, and I verily believe that she attended at the Melville Street address on December 9th, 2019 at 8:20pm, at which time she observed that her previous message had been removed, and she posted another message with her contact information on the lobby door for **TIAN LI** to contact her.

5. My colleague Carrie-Lee Godfrey informed me, and I verily believe that on December 12th, 2019, she received a call from 778-968-4605 from a woman who claimed that she lives at the Melville Street address and sometimes receives mail for **TIAN LI**, but she does not know that person and does not have any contact information for them.

6. I attended at the Salisbury Avenue address on December 17th, 2019 at 5:00pm, at which time I found that the building was locked and secure requiring a FOB for access, and **TIAN LI** was not listed in the intercom directory. I posted a message with my contact information on the lobby door for occupants of unit 401 to contact me.

7. On December 18th, 2019, I received a call from an adult female who claimed that **TIAN LI** might have been a previous renter at the Salisbury Avenue address as she had just moved in there two months ago, and she did not have any forwarding information.

SWORN BEFORE ME at the City of Vancouver, in the Province of British Columbia, this 19th day of December, 2019.	)	
A COMMISSIONER FOR TAKING AFFIDAVITS FOR BRITISH COLUMBIA	)	**AMERRITPAL MANDER**

RODERICK DAVID LIVINGSTON
#1230 - 777 Hornby Street
Vancouver, BC, V6Z 1S4
My commission expires on 6|30|22

Appendix F

Receivership of PE Consulting Ltd. **APPENDIX F**

Statement of Receipts and Disbursements

For the period from December 10, 2018 to June 12, 2020

Cash Receipts

Remaining Net Proceeds from Sale of Highview Property		2,801,613
Borrowings Under Receiver's Certificate		399,408
Interest		16,114
Refund of Insurance on Highview Property		3,288
Refund of Insurance on BMW		1,020
Sale of Vehicle - BMW		32,484
Luming Zhu Settlement		24,579
Vacancy tax holdback refund		5,329
Total Cash Receipts	**$**	**3,283,835**

Cash Disbursements

Bank Charges		94
Construction/Remediation Costs		392,397
General and administration		550
Filing Fees		20
GST paid on disbursements		19,629
GST paid on legal fees		2,622
GST paid on receiver fees		7,333
Insurance		10,420
Legal fees		52,976
Property tax		55,616
PST paid on legal fees		3,671
PST paid on disbursements		5
Receiver fees		146,661
Staging/Interior Design		12,050
Utilities		5,057
Repayment of Receiver's Certificate Borrowings		408,788
Total Cash Disbursements	**$**	**1,117,889**
Total Remaining Cash on Hand	**$**	**2,165,946**

Appendix G

Ernst & Young Inc.
Toronto, ON

Invoice

PE Consulting Ltd.
5811 Cooney Road
Suite 500 - North Tower
Richmond, BC V6X 3M1
Canada

Invoice No.: CA12C500004445
Please include this number with payment

Invoice Date:	26 November 2019
Due Date:	Upon receipt
Client No.:	0011946988
Engagement No.:	E-65281384

Remit To:
P.O. Box 57104, Postal Station A
Toronto, Ontario M5W 5M5
A/R Queries:
EYCanadaInvoiceInquiry@ca.ey.com

Re: PE Consulting Ltd.

For professional services rendered from September 28, 2019 to November 22, 2019

		Net	Tax	Rate	Tax Amount	**CAD** Total
Fee (details attached):		27,182.00	GST	5 %	1,359.10	28,541.10
		27,182.00			**1,359.10**	**28,541.10**
Invoice summary		**27,182.00**				
Tax :	5% GST				1,359.10	
Total:		**27,182.00**			**1,359.10**	**28,541.10**

A member of Ernst & Young Global

Terms: Payment due upon receipt. Interest is charged at the rate of 12 % per annum on balances unpaid after 30 days from date of invoice. Any disbursements not charged to your account on the date of this invoice will be billed later.
GST/HST: R123425522 **QST:** 1006354498

Electronic payment instructions:
Send direct and pay to: Bank of Montreal, International Banking, H.O. Montreal, SWIFT BIC Address BOFMCAM2, Ernst & Young LLP, 6 King Street West, Toronto, Ontario, Canada, M5H 1C3.

Wire transfer instructions: Transit #2411 Account #24111000237. Reference the name and address of remitter, invoice number and engagement number.

Electronic fund transfer instructions: Bank ID: 0001 Transit# 24112 Account# 1000237. To ensure accurate allocation of funds, please email gss.canadaaccountsreceivable@xe02.ey.com and include amount paid, invoice number and company name.

EY

PE Consulting Ltd.

Billing Details for September 28, 2019 to November 22, 2019

Invoice #CA12C500004445 dated 26 November 2019

Billing Analysis

Client Reference: **Engagement code**

Staff Name		Hours	Billing Rate	Amount
Kevin Brennan	Senior Vice President	3.70	$625	$2,312.50
Holly Palmer	Vice President	18.00	$475	$8,550.00
Jason Eckford	Manager	36.70	$350	$12,845.00
Joyce Yuen	Manager	1.40	$350	$490.00
Paolo Francisco	Staff	5.10	$295	$1,504.50
Marcos Souza	Paraprofessional	7.40	$200	$1,480.00
		72.30		**$27,182.00**

Add: GST (@ 5%)	$ 1,359.10
TOTAL	**$28,541.10**

EY

PE Consulting Ltd.
Time Details for September 28, 2019 to November 22, 2019
Invoice #CA12C500004445 dated 26 November 2019

Person	Date	Hours	Description
Kevin Brennan	1-Oct-19	0.40	Call with Holly / Jason
Kevin Brennan	23-Oct-19	0.20	Mary Yang: House matters
Kevin Brennan	24-Oct-19	0.30	Mary Yang: f/u calls
Kevin Brennan	25-Oct-19	0.40	Mary Yang: Admin
Kevin Brennan	30-Oct-19	0.30	Mary Yang: Update Holly
Kevin Brennan	5-Nov-19	0.60	Reconciliation / CRA matters
Kevin Brennan	6-Nov-19	0.60	Acting issues
Kevin Brennan	7-Nov-19	0.30	OSB request
Kevin Brennan	15-Nov-19	0.30	OSB matter
Kevin Brennan	19-Nov-19	0.30	Jason re realizations
Kevin Brennan		**3.70**	
Holly Palmer	1-Oct-19	3.20	Review TIan Li materials from PTI and send email re payment to counsel, draft receivers report re sale and fee approval.
Holly Palmer	2-Oct-19	2.70	Review invoice, make action points, draft receiver's report, discussion with KB re report.
Holly Palmer	16-Oct-19	0.20	Emails with Upward
Holly Palmer	17-Oct-19	0.60	Calls with BMO re payment of mortgage, emails with MT re payment to Tian Li.
Holly Palmer	18-Oct-19	0.30	Review changes to vesting order re payment of BMO and emails with counsel and BMO.
Holly Palmer	21-Oct-19	0.70	Review upward invoice, review PE tax issues and discuss tax returns with team.
Holly Palmer	24-Oct-19	0.10	Email with counsel re letter to Pantoscope
Holly Palmer	25-Oct-19	2.30	Review application response and GP 4th affidavit and related email correspondence, review PTI application response, drafting receivers 2nd report.
Holly Palmer	28-Oct-19	0.70	Review of affidavits for fee application, email with MM re highview approval.
Holly Palmer	29-Oct-19	0.60	Review orders re highview sale approval and related emails with counsel/creditors/upward, emails re removal of furniture and other logistics.
Holly Palmer	30-Oct-19	1.80	DIscuss filing with OSB, discussion with tax team re PE tax returns, draft changes to affidavit re fees.
Holly Palmer	31-Oct-19	0.10	Call with Leo re keys and logistics.
Holly Palmer	1-Nov-19	0.10	Email re extension date agreement
Holly Palmer	4-Nov-19	1.10	At counsel's signing affidavit for sale, review of all sale documents and reconciliation statement, discussions with counsel.
Holly Palmer	6-Nov-19	1.10	Email to MM re receivership process, review application and affidavit materials re fees and send comments to counsel.
Holly Palmer	7-Nov-19	0.40	Correspondence with team, and counsel re GFORCE sending docs to CRA.
Holly Palmer	8-Nov-19	1.20	Follow up on files sent to CRA by GFORCE, review of reconciliation docs for sale of Highview property and payments to be made.
Holly Palmer	12-Nov-19	0.80	Email to upward re sale and payment, discussion with tax team re tax returns, review final affidavit.
Holly Palmer		**18.00**	
Jason Eckford	2-Oct-19	1.40	Preparation of documents for H. Palmer re: Receiver's Report; updating Receiver's Report for the same.

Person	Date	Hours	Description
Jason Eckford	3-Oct-19	1.80	Review of correspondence with Miller Thomson; preparation of documents to support Receiver's Report; correspondence with Cassels re: Receiver's Report; updating Receiver's Report.
Jason Eckford	7-Oct-19	1.70	Updating Receiver's Report; correspondence with legal counsel for the same.
Jason Eckford	9-Oct-19	2.70	Drafting / finalizing Receiver's report; updating based on Cassel's review, discussion with H. Palmer for the same; correspondence with Cassels re: preparation of appendices.
Jason Eckford	10-Oct-19	4.60	Drafting / finalizing Receiver's report; updating based on Cassel's review, discussion with H. Palmer for the same; phone calls with J. Enns re: report.
Jason Eckford	11-Oct-19	3.20	Multiple calls with J. Enns re: Receiver's Report; updating report and appendices based on comments; discussion with H. Palmer for the same; preparation for signing, discussion with K. Brennan for the same.
Jason Eckford	15-Oct-19	2.90	Discussion with J. Enns re: service of report; review of Affidavit on EY fees and signing; numerous emails and calls with Cassels re: finalizing Receiver's report; correspondence with Realtors and Cassels re: vesting order.
Jason Eckford	16-Oct-19	1.10	numerous discussions with Cassels re: service of Receiver's report and Vesting Order; discussion with H. Palmer for the same.
Jason Eckford	17-Oct-19	0.40	Review of documents to identify contacts for servicing; discussion with H. Palmer and Cassels for the same
Jason Eckford	21-Oct-19	1.60	discussion with M. Souza re: status of CRA requests; multiple phone calls with CRA re: GST/Business Numbers, tax returns filed, requirements for clearance certificate.
Jason Eckford	29-Oct-19	4.30	Review of PE Consulting Affidavit and providing comments to H. Palmer; preparation for court; attending court re: approval and vesting order; correspondence with Realtor re: vesting order; review of documents received; posting documents to website.
Jason Eckford	30-Oct-19	0.20	correspondence with EY Tax re: tax return preparation
Jason Eckford	31-Oct-19	0.40	Discussion with L. Zheng re: house; compiling all copies of keys and mailing to realtor
Jason Eckford	1-Nov-19	0.40	Meeting with tax group re: tax return preparation
Jason Eckford	4-Nov-19	3.40	review of invoices received, discussion with M. Souza for the same; review of transactions and preparation of documents to support and provide to tax team re: tax returns; call with CRA re: Taxrequirements
Jason Eckford	8-Nov-19	3.40	receipt of cheque from 2791 highview place; phone call with CRA re: tax return; review of documents and preparation of balance sheet for inclusion in tax returns; discussion with EY Tax team and preparation of documents for the same.
Jason Eckford	15-Nov-19	0.50	Review of letter from CRA, review of documents for the same; call with CRA re: letter.
Jason Eckford	21-Nov-19	2.70	Drafting Second Receiver's Report and review of various documents received re: Highview Property sale.
Jason Eckford		**36.70**	
Joyce Yuen	1-Nov-19	0.80	Meet with restricting team to go over what information they have for T2s, discuss with Perry on what is needed ,etc.
Joyce Yuen	12-Nov-19	0.60	Discuss fee quote with Perry
Joyce Yuen		**1.40**	
Paolo Francisco	13-Nov-19	0.60	2011 Tax Return preparation
Paolo Francisco	15-Nov-19	0.40	2012 and 2013 tax return preparation
Paolo Francisco	15-Nov-19	0.90	2012 Tax Return Preparation
Paolo Francisco	15-Nov-19	0.80	2011 Tax Return preparation
Paolo Francisco	18-Nov-19	1.20	2013 Tax Return preparation
Paolo Francisco	18-Nov-19	0.20	2014 Tax Return Preparation
Paolo Francisco	22-Nov-19	0.80	2014 Tax Return Preparation
Paolo Francisco	22-Nov-19	0.20	2014 Tax Return Preparation

Person	Date	Hours	Description
Paolo Francisco		**5.10**	
Marcos Souza	16-Sep-19	0.90	Accounting; provided draft of R&D; Adjustment journal entries; adm matters.
Marcos Souza	19-Sep-19	0.60	Contacted LTSA customer service centre regarding change of name of business, accounting/processing payable.
Marcos Souza	20-Sep-19	0.80	Contact BC online help centre; Request change of address and updating company's address on BC Register Services.
Marcos Souza	23-Sep-19	0.80	Filling Annual Report for 2018 and 2019; general filing.
Marcos Souza	8-Oct-19	0.30	Accounting; processing payment.
Marcos Souza	15-Oct-19	0.60	Printing; drop off copy of Receiver's Report at Cassels Brooks.
Marcos Souza	4-Nov-19	0.40	Processing payables; accounting.
Marcos Souza	7-Nov-19	0.80	Accounting - processing payment; banking matters; filing.
Marcos Souza	8-Nov-19	0.90	Accounting; banking/deposit; processing payable.
Marcos Souza	14-Nov-19	1.30	Accounting; processing payables; GST filling matters; filing.
Marcos Souza		**7.40**	
Total		**72.30**	

Ernst & Young Inc.
Toronto, ON

Invoice

PE Consulting Ltd.
5811 Cooney Road
Suite 500 - North Tower
Richmond, BC V6X 3M1
Canada

Invoice No.: CA12C500004757
Please include this number with payment

Invoice Date:	March 02, 2020
Due Date:	Upon receipt
Client No.:	0011946988
Engagement No.:	E-65281384

Remit To:
P.O. Box 57104, Postal Station A
Toronto, Ontario M5W 5M5
A/R Queries:
EYCanadaInvoiceInquiry@ca.ey.com

Re: PE Consulting Ltd.

For professional services rendered from November 23, 2019 to February 21, 2020

		Net	Tax	Rate	Tax Amount	CAD Total
Fee (details attached):		47,405.50	GST	5 %	2,370.28	49,775.78
		47,405.50			**2,370.28**	**49,775.78**
Invoice summary		**47,405.50**				
Tax :	5% GST				2,370.28	
Total:		**47,405.50**			**2,370.28**	**49,775.78**

A member of Ernst & Young Global

Terms: Payment due upon receipt. Interest is charged at the rate of 12 % per annum on balances unpaid after 30 days from date of invoice. Any disbursements not charged to your account on the date of this invoice will be billed later.
GST/HST: R123425522 **QST:** 1006354498

Electronic payment instructions:
Send direct and pay to: Bank of Montreal, International Banking, H.O. Montreal, SWIFT BIC Address BOFMCAM2, Ernst & Young LLP, 6 King Street West, Toronto, Ontario, Canada, M5H 1C3.

Wire transfer instructions: Transit #2411 Account #24111000237. Reference the name and address of remitter, invoice number and engagement number.

Electronic fund transfer instructions: Bank ID: 0001 Transit# 24112 Account# 1000237. To ensure accurate allocation of funds, please email gss.canadaaccountsreceivable@xe02.ey.com and include amount paid, invoice number and company name.

PE Consulting Ltd.

Billing Details from November 23, 2019 to February 21, 2020
Invoice #CA12C500004757 dated March 2, 2020

Billing Analysis

Client Reference: **Engagement code**

Staff Name		Hours	Billing Rate	Amount
Kevin Brennan	Senior Vice President	2.3	$625	$1,437.50
Perry Yuen	Partner	2.1	$595	$1,249.50
Holly Palmer	Vice President	21.9	$475	$10,402.50
Deidre Feist	Senior Manager	1.6	$475	$760.00
Jason Eckford	Manager	34.4	$350	$12,040.00
Joyce Yuen	Manager	30.3	$350	$10,605.00
Paolo Francisco	Staff	29.8	$295	$8,791.00
Marcos Souza	Paraprofessional	10.6	$200	$2,120.00
		133.0		**$47,405.50**
Add: GST (@ 5%)				2,370.28
TOTAL				**$49,775.78**

EY

PE Consulting Ltd.
Time Details from November 23, 2019 to February 21, 2020
Invoice #CA12C500004757 dated March 2, 2020

Person	Date	Hours	Description
Kevin Brennan	29-Nov-19	1.2	Review affidavits
Kevin Brennan	2-Dec-19	0.3	Call with Holly
Kevin Brennan	28-Jan-20	0.2	Call with Holly
Kevin Brennan	12-Feb-20	0.4	Call re cash / update status
Kevin Brennan	18-Feb-20	0.2	Follow up with Holly
Kevin Brennan		**2.3**	
Perry Yuen	7-Feb-20	1.0	2011 – 2018 T2s
Perry Yuen	13-Feb-20	0.3	T106 and T1135 matters
Perry Yuen	18-Feb-20	0.8	Discussion and tax filings
Perry Yuen		**2.1**	
Holly Palmer	26-Nov-19	0.4	Review invoices, review repayment of borrowed funds.
Holly Palmer	27-Nov-19	0.2	Review affidavits and call with counsel
Holly Palmer	29-Nov-19	0.4	Provide final comments on affdiavits
Holly Palmer	2-Dec-19	0.1	Call with counsel re reply re former trustee fee.
Holly Palmer	10-Dec-19	0.8	Call with PTI counsel re Tian Li claim, email with BMO.
Holly Palmer	18-Dec-19	0.1	Email to counsel re former trustee application response.
Holly Palmer	20-Dec-19	0.2	Call with counsel re former trustee fee application
Holly Palmer	23-Dec-19	0.4	Call with counsel re former trustee fee application and review filed application response materials
Holly Palmer	30-Dec-19	0.9	Bank re certifying cheques for PTI, emails with MT, internal emails re bank process, visit bank re certification
Holly Palmer	6-Jan-20	1.3	Review tax email and issues, review invoices and payments, emails from tax team.
Holly Palmer	7-Jan-20	0.6	Review tax emails
Holly Palmer	8-Jan-20	1.2	Review file action points, tax progress, fee issue and timing
Holly Palmer	20-Jan-20	0.8	Report and tax issues, review action points.
Holly Palmer	21-Jan-20	0.2	Reply to Inspector re action list items
Holly Palmer	22-Jan-20	0.6	Tax returns, discussion with team re actions, fee discussion with counsel
Holly Palmer	23-Jan-20	0.3	Review receipts and disbursements and discuss with team
Holly Palmer	24-Jan-20	0.6	Review report closing documents and various other documents re report sections
Holly Palmer	27-Jan-20	1.3	Drafting receivers report
Holly Palmer	28-Jan-20	0.3	Discuss cash values and GIC options.
Holly Palmer	29-Jan-20	1.3	Review receivers report, gather information, discussions with counsel.
Holly Palmer	3-Feb-20	2.6	Drafting/reviewing receivers report, review GIC options for excess cash
Holly Palmer	4-Feb-20	3.1	Review CPO materials, review/draft receivers report, call with Counsel re process, review tax issues, review GL and R&D.
Holly Palmer	6-Feb-20	0.6	Review tax files and tax issues.
Holly Palmer	7-Feb-20	0.8	Review tax files and tax issues and integrate into report.
Holly Palmer	10-Feb-20	1.1	Draft and review receivers certificate for sale, discussion with counsel, review of fee application materials.
Holly Palmer	11-Feb-20	0.1	Email re GST returns, review claims process order and provide comments to legal,
Holly Palmer	14-Feb-20	1.2	Call re GST returns and review tax returns
Holly Palmer	18-Feb-20	0.1	Discuss tax issues with tax team.
Holly Palmer	19-Feb-20	0.1	Discuss tax issues with tax team.
Holly Palmer	21-Feb-20	0.2	Tax cover letter and discussion
Holly Palmer		**21.9**	
Deidre Feist	13-Feb-20	1.3	PE Consulting - research and respond to email from J. Eckford (TAS) re: entitlement to historical GST input tax credits by business in receivership
Deidre Feist	14-Feb-20	0.3	PE Consulting - respond to second email from J. Eckford (TAS) re: entitlement to historical GST input tax credits by business in receivership
Deidre Feist		**1.6**	
Jason Eckford	25-Nov-19	0.3	Cancelling security alarm system; review of correspondence from Creditor and correspondence with BMO re: bank draft

Person	Date	Hours	Description
Jason Eckford	27-Nov-19	0.5	Review of Receiver borrowing documents, calculation of interest and causing to repay loan and associated documents.
Jason Eckford	28-Nov-19	3.8	Drafting 2nd Receiver's Report
Jason Eckford	29-Nov-19	4.1	Drafting 2nd Receiver's Report
Jason Eckford	11-Dec-19	0.3	Correspondence with BMO re: bank draft
Jason Eckford	3-Jan-20	3.8	Co-ordination with Tax team re; Tax returns; review of email correspondence from F. Diamondstone, discussion with H. Palmer for thesame; updating Receiver's Report.
Jason Eckford	6-Jan-20	4.8	Correspondence with tax team; review of GL, documents and bank statements to prepare financials for tax team; discussion with H. Palmer for the same
Jason Eckford	7-Jan-20	2.3	Review of GL, documents and bank statements to prepare financials for tax team
Jason Eckford	10-Jan-20	2.1	Correspondence with Tax team; preparation of documents for tax team; finalizing financials.
Jason Eckford	23-Jan-20	1.8	Correspondence with tax team; updating financials based on tax team comments; review of documents for the same
Jason Eckford	24-Jan-20	2.7	Discussion with Tax team and H. Palmer re: tax returns, cost base, GST returns; review of documents and updating financials for thesame, drafting email and discussion with Tax team for the same.
Jason Eckford	27-Jan-20	0.7	Meeting with Tax team re: T2 preparation; review of correspondence from CRA and email to indirect tax team re: GST filings
Jason Eckford	10-Feb-20	3.8	Review of 2011 to 2018 tax returns, review of supporting materials, discussion with H. Palmer and Tax Team for the same.
Jason Eckford	13-Feb-20	1.2	Correspondence with Tax Team re: GST returns and ITC refund issues; responding to T2 Tax Team questions.
Jason Eckford	14-Feb-20	0.2	Tax Team correspondence; discussion with H. Palmer for the same.
Jason Eckford	18-Feb-20	1.6	Meeting with tax team, discussion with H. Palmer for the same; review of documents and impact on taxes payable; phone call with Mary Yang re: PE Consulting and questions posed by Tax Team.
Jason Eckford	21-Feb-20	0.4	Drafting representation letter for Jizhe Yang's signature re; Tax returns; discussion with Tax Team and revisions.
Jason Eckford		**34.4**	
Joyce Yuen	6-Jan-20	0.4	Tax - check status of returns, update BN, and see what is needed for FY2020 T2
Joyce Yuen	8-Jan-20	2.5	2011 to 2018 returns - Review
Joyce Yuen	10-Jan-20	2.0	2011 to 2018 Tax returns - Review and send questions to EY Restructuring
Joyce Yuen	13-Jan-20	0.3	T2s review
Joyce Yuen	14-Jan-20	2.0	T2s review
Joyce Yuen	15-Jan-20	3.5	Review T2s
Joyce Yuen	16-Jan-20	0.5	Review T2s
Joyce Yuen	24-Jan-20	0.3	Discuss tax implications of renovation costs with Perry, respond to Jason's question.
Joyce Yuen	27-Jan-20	0.5	Meeting with Restructuring to go over financials.
Joyce Yuen	6-Feb-20	7.0	Review and update 2011 to 2018 T2s
Joyce Yuen	7-Feb-20	4.3	Update 2011 to 2018 returns based on Perry's comments. Review 2019 return and update.
Joyce Yuen	13-Feb-20	4.3	Update 2011 to 2018 returns based on EY Restructuring's comments. Discuss with Perry about tax consequences on receivable amounts.
Joyce Yuen	14-Feb-20	2.0	Update returns, create summary of what NCL consists of, set up meeting with Restructuring
Joyce Yuen	18-Feb-20	0.5	Meeting with Jason and Perry on the treatment of the gain from the sale of property
Joyce Yuen	21-Feb-20	0.2	Reply to Jason on Mgmt Rep Letter
Joyce Yuen		**30.3**	
Paolo Francisco	25-Nov-19	1.0	2014 Tax Return preparation
Paolo Francisco	26-Nov-19	3.8	2015 to 2018 tax return preparation
Paolo Francisco	27-Nov-19	3.5	D memo and Tax Return preparation
Paolo Francisco	13-Jan-20	1.8	Uploading documents to EYI relating to 2011-2018 returns. preparing 2019 tax return, and drafting questions for EY restructuring regarding 2019 and 2020 financial statement
Paolo Francisco	14-Jan-20	1.1	Preparing 2019 tax return

EY

Person	Date	Hours	Description
Paolo Francisco	16-Jan-20	2.8	Making changes to the tax return based on manager queries (2011 and 2012 return)
Paolo Francisco	17-Jan-20	4.8	Making changes to the tax return based on queries (2012 - 2015)
Paolo Francisco	20-Jan-20	5.0	Making changes to the FY15 to FY2018 tax return based on queries.
Paolo Francisco	21-Jan-20	1.2	Making changes to the FY18 tax return based on queries.
Paolo Francisco	23-Jan-20	0.2	Looking at initial information for FY2019 tax return
Paolo Francisco	24-Jan-20	0.2	Creating a list of questions regarding FY2019 financial statements
Paolo Francisco	27-Jan-20	0.8	Meeting with EY restructuring to talk about PE consulting 2019 tax return items of note
Paolo Francisco	29-Jan-20	0.1	Making edits to the 2018 tax return
Paolo Francisco	3-Feb-20	2.1	Making edits to the 2018 tax return based on updated financial statements and preparing 2019 tax return
Paolo Francisco	4-Feb-20	1.4	Preparing 2019 tax return
Paolo Francisco		**29.8**	
Marcos Souza	8-Oct-19	0.6	Bank reconciliation for the month of Sept 2019.
Marcos Souza	30-Oct-19	0.8	Fax documents with the OSB; record management.
Marcos Souza	19-Nov-19	0.7	Fax to OSB; records management.
Marcos Souza	27-Nov-19	0.8	Request transfer of funds to JY account. repayment of loan and interest. Accounting.
Marcos Souza	2-Dec-19	0.4	Accounting; processing payment; record management.
Marcos Souza	4-Dec-19	0.8	Accounting; banking/deposit.
Marcos Souza	17-Dec-19	0.6	Accounting, recording receipt of funds; record management.
Marcos Souza	18-Dec-19	0.6	Bank reconciliation for the month of Nov 2019
Marcos Souza	20-Dec-19	0.2	Re: processing payment; record management.
Marcos Souza	6-Jan-20	0.3	Re: Call to Telus - cancel phone number/line.
Marcos Souza	14-Jan-20	0.7	Bank reconciliation for the month of Dec 2019.
Marcos Souza	20-Jan-20	0.6	Accounting/processing payables.
Marcos Souza	24-Jan-20	0.6	Accounting/processing payables.
Marcos Souza	28-Jan-20	0.4	Communicating with RBC bank; records/file management.
Marcos Souza	31-Jan-20	0.4	Prepared letter request to RBC - open GIC accounts; communicating with RBC bank.
Marcos Souza	3-Feb-20	0.6	Re: email RBC bank/GIC accounts; data entry in Ascend.
Marcos Souza	6-Feb-20	0.4	Records management/filing.
Marcos Souza	7-Feb-20	0.4	Records management/filing.
Marcos Souza	12-Feb-20	0.7	Bank reconciliation for the month of Jan 2020.
Marcos Souza		**10.6**	
Total		**133.0**	

Ernst & Young Inc.
Toronto, ON

Invoice

PE Consulting Ltd.
5811 Cooney Road
Suite 500 - North Tower
Richmond, BC V6X 3M1
Canada

Invoice No.: CA12C500005139
Please include this number with payment

Invoice Date:	May 22, 2020
Due Date:	Upon receipt
Client No.:	0011946988
Engagement No.:	E-65281384

Remit To:
P.O. Box 57104, Postal Station A
Toronto, Ontario M5W 5M5
A/R Queries:
EYCanadaInvoiceInquiry@ca.ey.com

Re: PE Consulting Ltd.

For professional services rendered from February 22, 2020 to May 15, 2020

		Net	Tax	Rate	Tax Amount	CAD Total
Fee (details attached):		22,061.50	GST	5 %	1,103.08	23,164.58
		22,061.50			**1,103.08**	**23,164.58**
Invoice summary		**22,061.50**				
Tax :	5% GST				1,103.08	
Total:		**22,061.50**			**1,103.08**	**23,164.58**

A member of Ernst & Young Global

Terms: Payment due upon receipt. Interest is charged at the rate of 12 % per annum on balances unpaid after 30 days from date of invoice. Any disbursements not charged to your account on the date of this invoice will be billed later.
GST/HST: R123425522 **QST:** 1006354498

Electronic payment instructions:
Send direct and pay to: Bank of Montreal, International Banking, H.O. Montreal, SWIFT BIC Address BOFMCAM2, Ernst & Young LLP, 6 King Street West, Toronto, Ontario, Canada, M5H 1C3.

Wire transfer instructions: Transit #2411 Account #24111000237. Reference the name and address of remitter, invoice number and engagement number.

Electronic fund transfer instructions: Bank ID: 0001 Transit# 24112 Account# 1000237. To ensure accurate allocation of funds, please email gss.canadaaccountsreceivable@xe02.ey.com and include amount paid, invoice number and company name.

EY

PE Consulting Ltd.

Billing Details from February 22, 2020 to May 15, 2020

Invoice #CA12C500005139 dated May 22, 2020

Billing Analysis

Client Reference: **E-65281384**

Staff Name		Hours	Billing Rate	Amount
Perry Yuen	Partner	0.8	$595	$476.00
Holly Palmer	Vice President	19.3	$475	$9,167.50
Jason Eckford	Manager	12.1	$350	$4,235.00
Joyce Yuen	Manager	8.0	$350	$2,800.00
Paolo Francisco	Staff	15.4	$295	$4,543.00
Marcos Souza	Paraprofessional	4.2	$200	$840.00
		59.8		**$22,061.50**
Add: GST (@ 5%)				1,103.08
TOTAL				**$23,164.58**

EY

PE Consulting Ltd.
Time Details from February 22, 2020 to May 15, 2020
Invoice #CA12C500005139 dated May 22, 2020

Person	Date	Hours	Description
Perry Yuen	3-Mar-20	0.8	Topside T2 returns
Perry Yuen		**0.8**	
Holly Palmer	25-Feb-20	0.2	Review tax letter, discuss meeting with MY re rep letter.
Holly Palmer	26-Feb-20	0.3	Review of payments and discussion with team
Holly Palmer	2-Mar-20	2.1	Review invoices, review R&D, discuss next steps with team, follow up on GFORCE timetable hearing.
Holly Palmer	3-Mar-20	0.8	Review R&D, email re invoices.
Holly Palmer	4-Mar-20	0.1	Email with Fred re receivers report.
Holly Palmer	9-Mar-20	2.9	Collect information re discussion with creditor, consider CRA issues and returns, call with MT re Redwell. email with JE re report and CPO.
Holly Palmer	10-Mar-20	2.9	Finalizing Receivers report and send to counsel for comments.
Holly Palmer	11-Mar-20	0.6	Emails and discussion with counsel re report, review payments and invoices.
Holly Palmer	13-Mar-20	2.6	Review final tax returns and instruct to file, emails re finalizing appendices, review counsel amendments to report and discuss with counsel.
Holly Palmer	16-Mar-20	2.6	Review counsel changes to report, update figures, print and sign signature pages, emails re finalization of tax returns. call with team on action points.
Holly Palmer	18-Mar-20	0.8	Call with counsel re CPO court process and next steps, former receivers fee issue, finalize receivers amendments.
Holly Palmer	19-Mar-20	0.3	Email from counsel re CPO application
Holly Palmer	25-Mar-20	0.4	Review invoicing and file status update and action points
Holly Palmer	31-Mar-20	0.7	Review action points with counsel, review taxation memo from PTI and discuss with counsel.
Holly Palmer	1-Apr-20	0.3	Review amendments to PTI letter and discuss with counsel
Holly Palmer	7-Apr-20	0.1	Cassels invoices
Holly Palmer	28-Apr-20	0.2	Emails and call with counsel re CPO
Holly Palmer	1-May-20	1.4	Call re finalizing receivers report, work on updates to report, and CPO
Holly Palmer		**19.3**	
Jason Eckford	3-Mar-20	2.4	Review of 2011 to 2015 tax returns adjusted for initial comments, discussion with H. Palmer for the same
Jason Eckford	4-Mar-20	2.4	Review of 2015 to 2019 tax returns, discussion with H. Palmer and tax, discussion re: taxes payable.
Jason Eckford	5-Mar-20	0.2	Correspondence with Mary Yang re: Tax returns
Jason Eckford	9-Mar-20	2.4	Meeting with Jizhe Yang to review tax returns, discussion with H. Palmer for the same
Jason Eckford	10-Mar-20	0.6	Review of 2019 tax return and Highview land cost based on meeting with J. Yang; review of Highview title, discussion with H. Palmerand direction to Tax team to update tax return.
Jason Eckford	13-Mar-20	2.4	Review of final tax returns, obtaining signatures and direction to file; preparation of appendices and other required docs for Receiver's Report
Jason Eckford	16-Mar-20	0.4	Discussion with Tax Team and H. Palmer re taxes filed; review of correspondence from Cassels re: Receiver's Report
Jason Eckford	19-Mar-20	0.6	Email correspondence with BMO re: requested documents; providing documents to Cassels and updates to Receiver's Report re: Cassels comments
Jason Eckford	23-Mar-20	0.2	Email correspondence with BMO re: bank draft support
Jason Eckford	31-Mar-20	0.3	Meeting with H. Palmer and Cassels re: status and next steps
Jason Eckford	12-May-20	0.2	Discussion with H. Palmer re: requested documents from BMO, correspondence with BMO for the same.
Jason Eckford		**12.1**	
Joyce Yuen	27-Feb-20	0.4	Discuss with Paolo on what needs to be done, research capitalizing soft costs, etc.
Joyce Yuen	2-Mar-20	4.0	Review queries and correct on preparer's behalf (rollforward amounts has to be corrected on all returns from 2011 to 2019)
Joyce Yuen	3-Mar-20	0.3	Answer Perry's question, send drafts to Jason
Joyce Yuen	9-Mar-20	0.5	prep for efiling
Joyce Yuen	10-Mar-20	0.5	Go over updates with Paolo, confirm land cost with Jason
Joyce Yuen	11-Mar-20	1.5	Review updates and PDF copies for Perry to review
Joyce Yuen	12-Mar-20	0.3	Print T183 and send drafts
Joyce Yuen	16-Mar-20	0.5	Review cover letter and coordinate for paperfiling of 2011 returns
Joyce Yuen		**8.0**	
Paolo Francisco	27-Feb-20	4.0	Updating tax files as per discussion with Joyce on capitalization
Paolo Francisco	28-Feb-20	2.6	Updating tax files as per manager queries

Person	Date	Hours	Description
Paolo Francisco	9-Mar-20	1.4	Sending supporting documents, adjusting signature pages, and printing signature pages for 2011 to 2018 tax returns
Paolo Francisco	10-Mar-20	0.2	Adjusting tax returns based on conversation with Joyce Yuen
Paolo Francisco	11-Mar-20	3.1	Adjusting tax returns based on conversation with Joyce Yuen
Paolo Francisco	12-Mar-20	0.2	Ensuring file has sign offs and responding to email
Paolo Francisco	13-Mar-20	1.7	Preparing file for finalization
Paolo Francisco	16-Mar-20	2.2	Organizing e-filing for Hufriz and looking into manual filing for 2011 tax return
Paolo Francisco		**15.4**	
Marcos Souza	4-Mar-20	0.8	Prepare adjusting entries/accounting/R&D.
Marcos Souza	9-Mar-20	0.7	Comm with RBC bank; Processing payables/accounting; arranging courier.
Marcos Souza	13-Mar-20	0.6	Processing payables/accounting.
Marcos Souza	16-Mar-20	0.8	Bank reconciliation for the month of Jan 2020.
Marcos Souza	25-Mar-20	0.6	Arranging payments of invoices with Sharon in Toronto; reissuing payments.
Marcos Souza	6-Apr-20	0.7	Accounting - processing parables - preparing request for cheque printing/mailing to Toronto; server filing/records management.
Marcos Souza		**4.2**	
Total		**59.8**	

Appendix H

Cassels

Invoice No:	2095557
Date:	November 29, 2019
Matter No.:	025522-00017
GST/HST No.:	R121379572
PST No.:	1012-5078
Lawyer:	Williams, H. Lance
Tel.:	
E-mail:	lwilliams@cassels.com

Attn: Holly Palmer
Ernst & Young Inc.
700 West Georgia Street
Vancouver, BC V7Y 1C7

Re: Pe Consulting Ltd.

Fees for professional services rendered up to and including November 26, 2019

Our Fees	27,669.50
Disbursements	719.85
Total Fees and Disbursements	28,389.35
GST @ 5.00%	1,403.31
PST @ 7.00%	1,964.63
TOTAL DUE (CAD)	**31,757.29**

We are committed to protecting the environment. Please provide your email address to payments@cassels.com to receive invoice and reminder statements electronically.

REMITTANCE ADVICE

Canadian Dollar EFT and Wire Payments:
Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT

Email payment details to payments@cassels.com

Cheque Payments:
Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Scotia Plaza, Suite 2100
40 King Street West
Toronto, Ontario, M5H 3C2
Canada

Please return remittance advice(s) with cheque

Invoice No:	2095557
Matter No.:	025522-00017
Amount:	**CAD 31,757.29**

FEE DETAIL

Date	Name	Description	Hours
Oct-07-19	F. Finn	Research substituted service;	1.70
Oct-07-19	H. Williams	Receipt and review of claim against Tian Li; receipt and review of receiver's report;	1.00
Oct-07-19	S. Danielisz	Discussion with F. Finn; diarize filing deadline for claim against Tian Li;	0.30
Oct-08-19	F. Finn	Draft demand letter; diarize limitation dates;	0.40
Oct-08-19	J. Enns	Review and revise First Report of the Receiver;	3.00
Oct-09-19	H. Williams	Review and revisions to Receiver's report and attending to matters regarding sale approval;	1.60
Oct-09-19	F. Finn	Draft demand letter;	0.80
Oct-09-19	J. Enns	Review and revise First Report of the Receiver;	0.60
Oct-10-19	J. Enns	Draft Notice of Application for sale approval and vesting order, fee approval, and increase of Receiver's borrowing charge; telephone call with J. Eckford to discuss First Receiver's Report; review and revise First Receiver's Report; draft sale approval and vesting order;	3.10
Oct-11-19	H. Williams	Addressing home sale matters;	0.20
Oct-11-19	S. Danielisz	All matters relating to preparing draft fee approval affidavits;	1.60
Oct-11-19	J. Enns	Review and revise First Report of the Receiver; telephone call with J. Eckford to discuss the Receiver's Report; draft Notice of Application for approval and vesting order; draft vesting order; review and revise affidavits;	3.70
Oct-15-19	J. Enns	Finalize notice of application, approval and vesting order, and affidavits in support of fee approval; meet with J. Eckford to review Receiver's Report and take affidavit in support of Receiver's fees; review and revise service list; attend to matters relating to the filing and service of application materials; meet with L. Williams to take affidavit; telephone discussions (various) with J. Eckford to discuss outstanding information required for the application material;	5.40
Oct-15-19	H. Williams	Review and preparation of court materials;	0.50
Oct-15-19	S. Danielisz	Attend to finalizing application materials relating to vesting and fee approval orders; all email communications regarding same;	1.80
Oct-16-19	F. Finn	Draft demand letter;	1.50
Oct-16-19	J. Enns	Meet with Forrest Finn to discuss demand letter to Tian Li; review and revise demand letter; extensive discussions with BMO representative regarding Vesting Order and sale of the Highview Property; review and revise Service List; discussions with BMO's local counsel regarding the application for sale approval and vesting order; attend to matters related to finalizing, filing, and serving the application;	3.20
Oct-16-19	S. Danielisz	All matters relating to preparing materials for court filing	1.50

Date	Name	Description	Hours
		and attend at court registry; finalizing service list; update e-pleadings;	
Oct-17-19	S. Danielisz	Prepare letters to Ellis Roadburg and Canada Revenue Energy; all matters relating to service of application materials on service list parties (by email and courier);	1.00
Oct-18-19	S. Danielisz	Prepare Application Record for hearing on October 29th and Book of Authorities (court and counsel copies);	2.00
Oct-21-19	J. Enns	Revise Approval and Vesting Order;	0.20
Oct-23-19	S. Danielisz	Revise and finalize Approval and Vesting Order for inclusion in Application Record;	0.30
Oct-24-19	H. Williams	Finalizing demand letter for bank draft; review and drafting claims process order; receipt and review of application response from former trustee and telephone call with counsel to former trustee regarding same;	1.50
Oct-25-19	S. Toffoli	Draft first cut of Claims Processing Order for L. Williams;	3.60
Oct-25-19	F. Finn	Draft demand letter regarding funds from a bank draft;	0.70
Oct-25-19	H. Williams	Review and correspondence with counsel to former receiver regarding opposition to application; review of jurisprudence and telephone call with counsel to former receiver;	0.80
Oct-25-19	S. Danielisz	Receive Responses from Prima Technology and G. Powroznik Group, update Application Record for October 29th hearing and attend at court registry to file;	1.00
Oct-27-19	S. Toffoli	Draft first cut of Claims Processing Order for L. Williams;	0.50
Oct-28-19	J. Enns	Prepare for application for Sale Approval and Vesting Order; review and revise demand letter to Tian Li; meet with F. Finn to discuss demand letter and Notice of Civil Claim; meet with L. Williams to discuss application, Tian Li demand and Notice of Civil Claim, and claims process order; telephone call with D. Fitzpatrick to discuss Sale Approval and Vesting Order and position of the Former Receiver; revise Sale Approval and Vesting Order;	2.20
Oct-28-19	F. Finn	Draft demand letter to Tian Li for funds derived from transfer of bank draft for under value;	0.50
Oct-28-19	H. Williams	Review of former trustee objections; drafting claims process;	0.50
Oct-28-19	S. Toffoli	Draft first cut of Claims Processing Order for L. Williams;	0.20
Oct-29-19	J. Enns	Prepare for and attend Court to obtain Sale Approval and Vesting Order and approval of fees, activities, and report of the Receiver; extensive discussions with D. Fitzpatrick regarding the Sale Approval and Vesting Order and taxation of the Former Receiver's accounts; review and revise demand letter to Tian Li; review and revise draft Claims Process Order; meet with S. Toffoli to discuss Claims Process Order and notice of application; meet with L. Williams to discuss Claims Process Order; correspondence with S. Towriss and W. Ng regarding sale transaction and required documents;	7.00

Date	Name	Description	Hours
Oct-29-19	S. Toffoli	Draft first cut of Claims Processing Order for L. Williams; start drafting Notice of Application for J. Enns;	4.30
Oct-30-19	W. Ng	Review purchase agreement and vesting order; telephone call to purchaser's solicitor regarding order and closing date; request for court-certified copy of vesting order;	1.20
Oct-30-19	S. Toffoli	Research into authority for claims process orders in court appointed receiverships for Notice of Application for J. Enns;	2.00
Oct-30-19	F. Finn	Draft letter to opposing counsel requesting the provision of documents;	0.80
Oct-30-19	J. Enns	Review comments provided by Receiver on affidavits in response to taxation applications; review and revise affidavits and application responses;	1.10
Oct-30-19	S. Danielisz	Circulate Orders granted on October 29th to service list; request and receive certified copy of Vesting Order;	0.30
Oct-31-19	S. Towriss	Review certified court order; review and execute letter to LTO enclosing and authorizing the use of the certified court order; review and execute cover letter to buyer's lawyer enclosing certified court order on undertakings;	0.30
Oct-31-19	W. Ng	Prepare letter to Land Title Office authorizing the use of the vesting order; prepare undertaking letter to purchaser's solicitor; discussions regarding extension of completion date;	1.50
Oct-31-19	S. Toffoli	Draft Notice of Application for Claims Process Order for J. Enns;	1.80
Nov-01-19	J. Enns	Review Receiver's comments on draft affidavit; review and revise affidavit and application response;	0.80
Nov-01-19	S. Toffoli	Draft Notice of Application for claims process order for J. Enns;	0.60
Nov-01-19	W. Ng	Correspondence with purchaser's lawyer regarding receipt of vesting order;	0.10
Nov-02-19	F. Finn	Draft notice of civil claim;	0.60
Nov-03-19	F. Finn	Draft notice of civil claim in relation to fraudulent conveyance of $50,000 bank draft;	0.70
Nov-04-19	J. Enns	Review and revise notice of application for claims process order; review and revise claims process order; review and revise notice of civil claim seeking various relief against Tian Li; attend to various matters pertaining to the closing of the Highview Property sale;	3.40
Nov-04-19	F. Finn	Draft notice of civil claim;	0.20
Nov-04-19	H. Williams	Review of land transfer matters;	0.40
Nov-04-19	S. Towriss	Review Contract; Review Order; receive and review email from laywer for BMO attaching payout documentation and letter releasing CPL; review all closing documents; internal discussion regarding what a receiver should righly be signing as seller of a property; review Order in respect of same; email to Buyer;s lawyer attacheding comments/revisions to	1.60

Date	Name	Description	Hours
		loan documentsl review and respond to emails from Buyer's lawyer regarding same; emails to and from H. Palmer regarding signing closing documents;	
Nov-04-19	S. Toffoli	Get blackline of Claims Process Order for Enns, J.;	0.20
Nov-05-19	J. Enns	Discussions with the Receiver regarding application response and affidavit material; review and revise affidavit of the Receiver;	0.50
Nov-05-19	H. Williams	Execution of documents and closing matters; review of account matters; review of Tian Li matters.	1.30
Nov-05-19	S. Towriss	Review executed closing documents; review and execute undertaking letter to Buyer's lawyer setting out undertakings; internal discussions regarding empty homes tax; email to H. Palmer regarding same; email to Buyer's lawyer with further minor changes to closing documents; emails to and from Buyer's lawyer regarding timing of delivery of signed Seller documents; review and affix digital Juricert signature to EF Form 17 Release of BMO CPL for electronic filing and registration purposes; review injunction on title; internal discussion regarding same; review Order in respect of same; receive and review letter from Buyer's lawyer enclosing sale proceeds and Buyer's exectued documents; confirm transaction has closed;	2.00
Nov-05-19	W. Ng	Attend to pre-closing matters; prepare letter returning documents to purchaser's solicitor; prepare Land Title Office Form 17 for the release of Certificate of Pending Litigation; receive instructions regarding electronic meet; attend to electronic meet for the filing of transfer documents; report on filings; receive and review undertaking letter; arrange for pick-up and certification of funds;	2.20
Nov-06-19	W. Ng	Coordinate certification and receipt of incoming funds; review Authority to Pay; prepare draft trust reconciliation; prepare requisition for cheques for the payout; prepare draft letters for payout; discuss Bank of Montreal ("BMO") payout statement; telephone call to solicitor for Bank of Montreal regarding payout statement and request for correspondence from BMO confirming the payment amount; discuss interest payable with solicitor for BMO; report on same to solicitor; discussions regarding BMO legal fees and property management fees and Cassels direction regarding same; complete trust reconciliation in preparation of payout;	2.10
Nov-06-19	S. Towriss	Review and consider BMO "payout statement" received from R. Ellis; internal discussion regarding same; review and consider undertakings received from R. Ellis to payout BMO mortgage; detailed email to R. Ellis regarding payout statement and per diem interest on payout of BMO loan; internal discussion regarding whether R. Ellis's legal fees form part of the BMO Mortgage security to be paid out;	0.50

Date	Name	Description	Hours
Nov-06-19	S. Toffoli	revise draft Notice of Application and Claims Process Order for Enns, J.;	4.50
Nov-07-19	H. Williams	Preparation of fee taxation materials.	0.20
Nov-07-19	W. Ng	Attend to payout of funds in accordance with court order; various emails to and from payees confirming amounts payable; trust reconciliation; prepare letters to payees enclosing funds; confirm payouts;	1.40
Nov-08-19	J. Enns	Review and revise response to application by Former Receiver to approve the Former Receiver's accounts; review and revise response to application by Former Receiver's counsel to approve the accounts of the Former Receiver's counsel;	1.60
Nov-12-19	J. Enns	Finalize application response and affidavit of the Receiver; finalize draft Notice of Civil Claim against Tian Li; review and revise application for claims process and claims process order; meet with L. Williams to discuss the claims process application material;	2.10
Nov-12-19	F. Finn	Draft notice of civil claim;	0.60
Nov-12-19	S. Toffoli	Revise Notice of Application for Claims Process Order for Enns, J.	2.10
Nov-13-19	S. Toffoli	Revise draft Claims Process Order for Enns, J.;	0.10
Nov-14-19	W. Ng	Requisition cheques for release of holdback funds for utilities and Speculation Tax;	0.40
Nov-14-19	F. Finn	Draft notice of civil claim to recover funds transferred to Tian Li; research the Fraudulent Preference Act (BC);	1.00
Nov-14-19	S. Toffoli	Revise draft Claims Process Order for Enns, J.;	1.00
Nov-19-19	W. Ng	Correspondence to client confirming payment of invoices for utilities and speculation taxes from trust; obtain and review tax certificate to confirm payment of all outstanding utilities; telephone (voicemail) message to Canada Revenue Agency to confirm payment of speculation tax;	0.60
Nov-21-19	J. Enns	Review and revise notice of civil claim against Tian Li; telephone call with L. Williams to discuss statement of claim;	1.70
Nov-26-19	H. Williams	Finalising fee opposition materials.	0.20

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Williams, H. Lance	Partner	8.20	525.00	4,305.00
Towriss, Shauna	Partner	4.40	555.00	2,442.00
Enns, Jared	Associate	39.60	355.00	14,058.00
Ng, Wendy	Law Clerk/ Paralegal	9.50	300.00	2,850.00
Danielisz, Sue	Law Clerk/ Paralegal	9.80	240.00	2,352.00
Toffoli, Spencer	Law Student	20.90	175.00	3,657.50

Name	Title	Hours	Rate	Amount
Finn, Forrest	Law Student	9.50	175.00	1,662.50
Total (CAD)		**101.90**		**31,327.00**

Our Fees	27,669.50	
GST @ 5.00%	1,383.48	
PST @ 7.00%	1,936.87	
TOTAL FEES & TAXES (CAD)		**30,989.85**

DISBURSEMENT SUMMARY

Non-Taxable Disbursements		
Agency Fees and Disbursements	112.00	
BC Land & Title - Searches, Certification	182.22	
Bank Charges - Wires, Drafts, Certification	10.00	
Change of Address	10.50	
BC Online - PPSA Search/Registrations	8.50	
Total Non-Taxable Disbursements	323.22	
Taxable Disbursements		
BC Land & Title - Searches, Certification	36.50	
Agency Fees and Disbursements	48.13	
West Law - Online Searches	236.25	
Copies	63.75	
Postage	12.00	
Total Taxable Disbursements	396.63	
GST @ 5.00%	19.83	
PST @ 7.00%	27.76	
Total Taxable Disbursements & Taxes	767.44	
TOTAL DISBURSEMENTS & TAXES (CAD)		**767.44**

TOTAL FEES	**27,669.50**
TOTAL DISBURSEMENTS	**719.85**
TOTAL TAXES	**3,367.94**
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	**31,757.29**

Cassels

Invoice No:	2097039
Date:	December 12, 2019
Matter No.:	025522-00017
GST/HST No.:	R121379572
PST No.:	1012-5078
Lawyer:	Williams, H. Lance
Tel.:	
E-mail:	lwilliams@cassels.com

Attn: Holly Palmer
Ernst & Young Inc.
700 West Georgia Street
Vancouver, BC V7Y 1C7

Re: PE Consulting Ltd.

Fees for professional services rendered up to and including November 30, 2019

Our Fees	2,924.50
Disbursements	135.54
Total Fees and Disbursements	3,060.04
GST @ 5.00%	153.01
PST @ 7.00%	214.19
TOTAL DUE (CAD)	**3,427.24**

We are committed to protecting the environment. Please provide your email address to payments@cassels.com to receive invoice and reminder statements electronically.

REMITTANCE ADVICE

Canadian Dollar EFT and Wire Payments:
Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT

Email payment details to payments@cassels.com

Cheque Payments:
Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Scotia Plaza, Suite 2100
40 King Street West
Toronto, Ontario, M5H 3C2
Canada

Please return remittance advice(s) with cheque

Invoice No:	2097039
Matter No.:	025522-00017
Amount:	**CAD 3,427.24**

FEE DETAIL

Date	Name	Description	Hours
Nov-19-19	S. Danielisz	Review and revise draft Notice of Civil Claim regarding Tian Li;	0.60
Nov-21-19	S. Danielisz	Review and update draft Notice of Civil Claim;	0.30
Nov-22-19	S. Danielisz	All process relating to filing Notice of Civil Claim including attending at Court Registry;	0.80
Nov-26-19	J. Enns	Correspondence to and from Robert J. Ellis regarding fees;	0.20
Nov-27-19	J. Enns	Meet with L. Williams to discuss affidavit of the Receiver; review and revise affidavit and application response of the Receiver;	0.90
Nov-27-19	H. Williams	Finalize court materials;	0.20
Nov-28-19	J. Enns	Review and revise responding material of the Receiver;	1.20
Nov-29-19	S. Danielisz	All work relating to finalizing Affidavit #3 of H. Palmer and Application Responses.	2.80
Nov-29-19	J. Enns	Finalize responding material of the Receiver; meet with Receiver to discuss, review, and finalize responding material;	2.60

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Williams, H. Lance	Partner	0.20	525.00	105.00
Enns, Jared	Associate	4.90	355.00	1,739.50
Danielisz, Sue	Law Clerk/ Paralegal	4.50	240.00	1,080.00
Total (CAD)		**9.60**		**2,924.50**

Our Fees	2,924.50	
GST @ 5.00%	146.23	
PST @ 7.00%	204.70	
TOTAL FEES & TAXES (CAD)		**3,275.43**

DISBURSEMENT SUMMARY

Taxable Disbursements	
Delivery	125.04
Copies	10.50
Total Taxable Disbursements	135.54
GST @ 5.00%	6.78
PST @ 7.00%	9.49
Total Taxable Disbursements & Taxes	151.81

TOTAL DISBURSEMENTS & TAXES (CAD)	**151.81**

TOTAL FEES	**2,924.50**
TOTAL DISBURSEMENTS	**135.54**
TOTAL TAXES	**367.20**
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	**3,427.24**

Cassels

Invoice No:	2100125
Date:	December 31, 2019
Matter No.:	025522-00017
GST/HST No.:	R121379572
PST No.:	1012-5078
Lawyer:	Williams, H. Lance
Tel.:	
E-mail:	lwilliams@cassels.com

Attn: Holly Palmer
Ernst & Young Inc.
700 West Georgia Street
Vancouver, BC V7Y 1C7

Re: PE Consulting Ltd.

Fees for professional services rendered up to and including December 31, 2019

Our Fees	2,777.00
Disbursements	695.06
Total Fees and Disbursements	3,472.06
GST @ 5.00%	163.60
PST @ 7.00%	229.05
TOTAL DUE (CAD)	**3,864.71**

We are committed to protecting the environment. Please provide your email address to payments@cassels.com to receive invoice and reminder statements electronically.

REMITTANCE ADVICE

Canadian Dollar EFT and Wire Payments:
Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT

Email payment details to payments@cassels.com

Cheque Payments:
Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Scotia Plaza, Suite 2100
40 King Street West
Toronto, Ontario, M5H 3C2
Canada

Please return remittance advice(s) with cheque

Invoice No:	2100125
Matter No.:	025522-00017
Amount:	**CAD 3,864.71**

FEE DETAIL

Date	Name	Description	Hours
Dec-02-19	J. Enns	Finalize responding material; correspondence and extensive telephone discussion with D. Fitzpatrick regarding same;	0.50
Dec-03-19	J. Enns	Review responding application material of PTI;	1.20
Dec-04-19	S. Danielisz	All matters relating to arranging for personal service of Notice of Civil Claim on Tian Li; emails to and from J. Enns;	0.40
Dec-16-19	S. Danielisz	Follow-up with process server regarding service of Notice of Civil Claim in Tian Li and advise J. Enns of status;	0.20
Dec-18-19	J. Enns	Telephone call with Receiver to discuss application response; telephone call D. Fitzpatrick to discuss application response; email to D. Fitzpatrick regarding his request for an extension to consider application response;	0.50
Dec-20-19	S. Danielisz	All matters relating to preparing response materials for filing at court registry;	0.60
Dec-23-19	J. Enns	Attend to various matters relating to filing and serving application response and affidavit; correspondence to D. Fitzpatrick; discussions with the Receiver concerning application response and matters relating thereto; meet with L. Williams;	2.20
Dec-23-19	S. Danielisz	All matters relating to filing response materials at court registry and serving same;	1.20
Dec-31-19	J. Enns	Review invoice from BMO's counsel and mortgage terms; review foreclosure proceedings and consider issues relating to fees; correspondence to L. Williams and S. Towriss regarding claim for fees; telephone call with Receiver to discuss payment of BMO's legal fees.	1.80

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Enns, Jared	Associate	6.20	355.00	2,201.00
Danielisz, Sue	Law Clerk/ Paralegal	2.40	240.00	576.00
Total (CAD)		**8.60**		**2,777.00**

Our Fees	2,777.00	
GST @ 5.00%	138.85	
PST @ 7.00%	194.40	
TOTAL FEES & TAXES (CAD)		**3,110.25**

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

Court - Filing Executions	200.00
Total Non-Taxable Disbursements	200.00

Taxable Disbursements

Copies	176.00
Delivery	129.06
Agency Fees and Disbursements	190.00
Total Taxable Disbursements	495.06
GST @ 5.00%	24.75
PST @ 7.00%	34.65
Total Taxable Disbursements & Taxes	554.46

TOTAL DISBURSEMENTS & TAXES (CAD)	**754.46**
TOTAL FEES	**2,777.00**
TOTAL DISBURSEMENTS	**695.06**
TOTAL TAXES	**392.65**
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	**3,864.71**

Cassels

Invoice No:	2104584
Date:	March 09, 2020
Matter No.:	025522-00017
GST/HST No.:	R121379572
PST No.:	1012-5078
Lawyer:	Williams, H. Lance
Tel.:	
E-mail:	lwilliams@cassels.com

Attn: Holly Palmer
Ernst & Young Inc.
700 West Georgia Street
Vancouver, BC V7Y 1C7

Re: PE Consulting Ltd.

Fees for professional services rendered up to and including February 29, 2020

Our Fees	2,702.00
Disbursements	20.22
Total Fees and Disbursements	2,722.22
GST @ 5.00%	135.81
PST @ 7.00%	190.14
TOTAL DUE (CAD)	**3,048.17**

We are committed to protecting the environment. Please provide your email address to payments@cassels.com to receive invoice and reminder statements electronically.

REMITTANCE ADVICE

Canadian Dollar EFT and Wire Payments:
Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1
Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
Email payment details to payments@cassels.com

Cheque Payments:
Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Scotia Plaza, Suite 2100
40 King Street West
Toronto, Ontario, M5H 3C2
Canada

Invoice No:	2104584
Matter No.:	025522-00017
Amount:	**CAD 3,048.17**

Payment due upon receipt. Please return remittance advice(s) with cheque

FEE DETAIL

Date	Name	Description	Hours
Jan-13-20	S. Danielisz	Email communications regarding obtaining sub-service order for Tian Li;	0.20
Jan-15-20	J. Enns	Telephone call with PTI to discuss issues relating to BMO, application to obtain information from BMO, and issues pertaining to PTI's substitutional service order (and judgments); review affidavit of attempted service; review PTI's substitutional service material;	0.70
Jan-21-20	J. Enns	Telephone call with the Receiver to discuss outstanding Tian Li issues and sub-service application, as well as issues with respect to prior sub-service order and enforcement proceedings; discussions with counsel to T&E regarding same;	0.50
Jan-30-20	C. Fadden	Discussed with SKT next steps for her and Selena re: 3E; saved LT Buyer's Counsel encl signed documents to file	0.10
Feb-04-20	J. Enns	Review and revise Claims Process Order; attend to various matters including the Receiver's Certificate and discussions with the Receiver;	0.60
Feb-04-20	H. Williams	Preparation of claims process and related materials;	1.00
Feb-07-20	S. Toffoli	Revise Claims Process Order based on feedback from L. Williams;	0.30
Feb-10-20	S. Toffoli	Revise Claims Process Order based on feedback from L. Williams;	0.60
Feb-13-20	S. Danielisz	Prepare Requisition to file Receiver's Certificate with Court;	0.20
Feb-19-20	S. Danielisz	File Receiver's Certificate at Court Registry and forward filed copy to H. Palmer;	0.30
Feb-28-20	S. Toffoli	Revise Claims Process Order for J. Enns.	0.30
Feb-28-20	J. Enns	Prepare for and attend court for pre-hearing conference;	2.50

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Toffoli, Spencer	Law Student	1.20	175.00	210.00
Danielisz, Sue	Law Clerk/ Paralegal	0.70	285.00	199.50
Enns, Jared	Associate	4.30	400.00	1,720.00
Williams, H. Lance	Partner	1.00	550.00	550.00
Fadden, Caroline	Law Clerk/ Paralegal	0.10	225.00	22.50
Total (CAD)		**7.30**		**2,702.00**

Our Fees	2,702.00	
GST @ 5.00%	135.10	
PST @ 7.00%	189.14	
TOTAL FEES & TAXES (CAD)		**3,026.24**

DISBURSEMENT SUMMARY

Non-Taxable Disbursements	
Litigation Search	6.00
Total Non-Taxable Disbursements	6.00
Taxable Disbursements	
Delivery	14.22
Total Taxable Disbursements	14.22
GST @ 5.00%	0.71
PST @ 7.00%	1.00
Total Taxable Disbursements & Taxes	15.93

TOTAL DISBURSEMENTS & TAXES (CAD)	**21.93**

TOTAL FEES	**2,702.00**
TOTAL DISBURSEMENTS	**20.22**
TOTAL TAXES	**325.95**
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	**3,048.17**

Cassels

Invoice No:	2106900
Date:	April 08, 2020
Matter No.:	025522-00017
GST/HST No.:	R121379572
PST No.:	1012-5078
Lawyer:	Williams, H. Lance
Tel.:	(604) 691-6112
E-mail:	lwilliams@cassels.com

Attn: Holly Palmer
Ernst & Young Inc.
700 West Georgia Street
Vancouver, BC V7Y 1C7

Re: PE Consulting Ltd.

Fees for professional services rendered up to and including March 31, 2020

Our Fees	6,726.50
GST @ 5.00%	336.33
PST @ 7.00%	470.85
TOTAL DUE (CAD)	**7,533.68**

We are committed to protecting the environment. Please provide your email address to payments@cassels.com to receive invoice and reminder statements electronically.

REMITTANCE ADVICE

Canadian Dollar EFT and Wire Payments:
Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1
Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
Email payment details to payments@cassels.com

Cheque Payments:
Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Scotia Plaza, Suite 2100
40 King Street West
Toronto, Ontario, M5H 3C2
Canada

Invoice No:	2106900
Matter No.:	025522-00017
Amount:	**CAD 7,533.68**

Payment due upon receipt. Please return remittance advice(s) with cheque

FEE DETAIL

Date	Name	Description	Hours
Mar-02-20	J. Enns	Continue drafting claims process application material;	0.50
Mar-11-20	J. Enns	Review and revise Receiver's Report; continue drafting application material in connection with the claims process;	1.10
Mar-13-20	J. Enns	Review and revise Receiver's Report; meet with L. Williams to discuss same;	3.20
Mar-16-20	J. Enns	Review further revised Second Report of the Receiver and correspondence from the Receiver regarding same; consider issues pertaining to Tian Li claim and settlement of the Former Receiver's accounts;	0.40
Mar-17-20	J. Enns	Correspondence to and from the Receiver regarding various issues, including CRA withholding tax issue and response to the Former Receiver's taxation application;	0.20
Mar-17-20	J. Enns	Review and revise Receiver's Report; continue drafting application material in connection with the Claims Process;	1.10
Mar-17-20	J. Enns	Correspondence to and from counsel to PTI; review settlement proposal and continue drafting application for claims process order; correspondence to and from the Receiver regarding settlement and claims process;	0.80
Mar-18-20	J. Enns	Review settlement proposal from PTI; telephone call with G. Plottel to discuss settlement proposal and Receiver's position; conference call with G. Plottel and L. Williams to discuss withholding tax issues and procedure in relation thereto;	0.70
Mar-19-20	H. Williams	Review of receiver's report and matters relating to claims process;	1.00
Mar-19-20	J. Enns	Review and revise Second Report of the Receiver; draft application material in connection with approval of activities and accounts of the Receiver and its counsel; review and revise claims process order;	2.10
Mar-24-20	J. Enns	Review settlement proposal from PTI; review application material and response of the Receiver; email to L. Williams regarding issues with PTI's settlement proposal; commence drafting notice of application regarding the withholding tax;	1.20
Mar-24-20	S. Danielisz	Review and revise draft Claims Process Order and Schedules A-G;	1.50
Mar-24-20	S. Danielisz	Conduct Court Services Online search and reporting results to J. Enns;	0.20
Mar-26-20	S. Danielisz	Draft counsel and receiver fee approval affidavits and order; review and revise notice of application;	2.20
Mar-27-20	J. Enns	Email to the Receiver regarding PTI settlement proposal; telephone call to PTI's legal counsel regarding same;	0.20
Mar-27-20	H. Williams	Review of fee dispute matters and potential settlements;	0.50
Mar-30-20	J. Enns	Telephone call with G. Plottel;	0.10
Mar-31-20	H. Williams	Review of claims process matters with Receiver;	0.20
Mar-31-20	J. Enns	Discuss the application for the claims process order with the	0.10

Date	Name	Description	Hours
		Receiver.	

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Enns, Jared	Associate	11.70	400.00	4,680.00
Williams, H. Lance	Partner	1.70	550.00	935.00
Danielisz, Sue	Law Clerk/ Paralegal	3.90	285.00	1,111.50
Total (CAD)		**17.30**		**6,726.50**

Our Fees	6,726.50	
GST @ 5.00%	336.33	
PST @ 7.00%	470.85	
TOTAL FEES & TAXES (CAD)		**7,533.68**

TOTAL FEES	**6,726.50**
TOTAL TAXES	**807.18**
TOTAL FEES & TAXES (CAD)	**7,533.68**

OUTSTANDING INVOICES

Invoice Date	Invoice Number	Bill Amount	Payments / Credits	Balance Due
12/12/19	2097039	3,427.24	0.00	3,427.24
04/08/20	2106900	7,533.68	0.00	7,533.68
Total (CAD)		**10,960.92**	**0.00**	**10,960.92**

Cassels

Invoice No:	2109411
Date:	May 11, 2020
Matter No.:	025522-00017
GST/HST No.:	R121379572
PST No.:	1012-5078
Lawyer:	Williams, H. Lance
Tel.:	(604) 691-6112
E-mail:	lwilliams@cassels.com

Attn: Holly Palmer
Ernst & Young Inc.
700 West Georgia Street
Vancouver, BC V7Y 1C7

Re: PE Consulting Ltd.

Fees for professional services rendered up to and including April 30, 2020

Our Fees	137.50
Disbursements	6.00
Total Fees and Disbursements	143.50
GST @ 5.00%	6.88
PST @ 7.00%	9.62
TOTAL DUE (CAD)	**160.00**

We are committed to protecting the environment. Please provide your email address to payments@cassels.com to receive invoice and reminder statements electronically.

REMITTANCE ADVICE

Canadian Dollar EFT and Wire Payments:
Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1
Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
Email payment details to payments@cassels.com

Cheque Payments:
Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Scotia Plaza, Suite 2100
40 King Street West
Toronto, Ontario, M5H 3C2
Canada

Payment due upon receipt. Please return remittance advice(s) with cheque

Invoice No:	2109411
Matter No.:	025522-00017
Amount:	**CAD 160.00**

FEE DETAIL

Date	Name	Description	Hours
Apr-01-20	J. Enns	Email correspondence regarding PTI settlement proposal; email to G. Plottel regarding settlement proposal.	0.30
Apr-01-20	F. Finn	Review notice of application;	0.10

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Enns, Jared	Associate	0.30	400.00	120.00
Finn, Forrest	Law Student	0.10	175.00	17.50
Total (CAD)		**0.40**		**137.50**

Our Fees	137.50	
GST @ 5.00%	6.88	
PST @ 7.00%	9.62	
TOTAL FEES & TAXES (CAD)		**154.00**

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

Litigation Search	6.00
Total Non-Taxable Disbursements	6.00

TOTAL DISBURSEMENTS & TAXES (CAD)	**6.00**
TOTAL FEES	**137.50**
TOTAL DISBURSEMENTS	**6.00**
TOTAL TAXES	**16.50**
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	**160.00**

OUTSTANDING INVOICES

Invoice Date	Invoice Number	Bill Amount	Payments / Credits	Balance Due
04/08/20	2106900	7,533.68	0.00	7,533.68
05/11/20	2109411	160.00	0.00	160.00
Total (CAD)		**7,693.68**	**0.00**	**7,693.68**

Cassels

Invoice No:	2111826
Date:	June 15, 2020
Matter No.:	025522-00017
GST/HST No.:	R121379572
PST No.:	1012-5078
Lawyer:	Williams, H. Lance
Tel.:	(604) 691-6112
E-mail:	lwilliams@cassels.com

Attn: Holly Palmer
Ernst & Young Inc.
700 West Georgia Street
Vancouver, BC V7Y 1C7

Re: PE Consulting Ltd.

Fees for professional services rendered up to and including May 31, 2020

Our Fees	600.00
GST @ 5.00%	30.00
PST @ 7.00%	42.00
TOTAL DUE (CAD)	**672.00**

We are committed to protecting the environment. Please provide your email address to payments@cassels.com to receive invoice and reminder statements electronically.

REMITTANCE ADVICE

Canadian Dollar EFT and Wire Payments:
Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1
Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
Email payment details to payments@cassels.com

Cheque Payments:
Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Scotia Plaza, Suite 2100
40 King Street West
Toronto, Ontario, M5H 3C2
Canada

Payment due upon receipt. Please return remittance advice(s) with cheque

Invoice No:	2111826
Matter No.:	025522-00017
Amount:	**CAD 672.00**

FEE DETAIL

Date	Name	Description	Hours
May-12-20	J. Enns	Review matters pertaining to Tian Li claim; correspondence with PTI's counsel regarding same;	0.30
May-19-20	J. Enns	Review Tian Li claim and related matters; correspondence with the Receiver regarding application for the CPO; correspondence with counsel to PTI regarding Tian Li application;	0.30
May-22-20	J. Enns	Telephone call with counsel to PTI to discuss Tian Li application;	0.20
May-27-20	J. Enns	Correspondence with PTI regarding garnishing orders;	0.20
May-29-20	J. Enns	Telephone call with counsel to PTI to discuss various matters pertaining to PE Consulting and pending application for fee approval from the Former Receiver.	0.50

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Enns, Jared	Associate	1.50	400.00	600.00
Total (CAD)		**1.50**		**600.00**

Our Fees	600.00	
GST @ 5.00%	30.00	
PST @ 7.00%	42.00	
TOTAL FEES & TAXES (CAD)		**672.00**

TOTAL FEES	**600.00**
TOTAL TAXES	**72.00**
TOTAL FEES & TAXES (CAD)	**672.00**

OUTSTANDING INVOICES

Invoice Date	Invoice Number	Bill Amount	Payments / Credits	Balance Due
04/08/20	2106900	7,533.68	0.00	7,533.68
05/11/20	2109411	160.00	0.00	160.00
06/15/20	2111826	672.00	0.00	672.00
Total (CAD)		**8,365.68**	**0.00**	**8,365.68**