



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.

### NOTICE OF APPLICATION

**NAME OF APPLICANT:** Ernst & Young Inc., in its capacity as the receiver and receiver manager (and in such capacity, the “**Receiver**”) of all of the assets, undertakings and property of PE Consulting Ltd. (the “**Company**”)

**TO:** Service List (attached hereto as **Schedule “A”**)

TAKE NOTICE that an application will be made by the applicant to the presiding judge, by telephone, at 9:45 a.m. on **December 16, 2020**, at the courthouse at 800 Smithe Street, Vancouver, BC, or at such other date and or time as the court may order, for the orders set out in Part 1 below.

#### PART 1: ORDER SOUGHT

1. An order, substantially in the form attached hereto as **Schedule “B”**:
  - (a) approving the Third Report of the Receiver, dated December 4, 2020 (the “**Third Report**”) and the activities of the Receiver as described therein;
  - (b) approving the Receiver’s accounts, as set out in Affidavit #5 of Holly Palmer, dated December 4, 2020; and
  - (c) approving the accounts of the Receiver’s legal counsel, as set out in Affidavit #3 of H Lance Williams, dated December 4, 2020.
2. Such other relief as counsel may advise and this Honourable Court deems just.

#### PART 2: FACTUAL BASIS

##### Introduction

##### *Appointment of the Receiver*

1. On June 8, 2018, G. Powroznik Group Inc. (“**GPGI**”), in its capacity as the former trustee of the bankruptcy estate (the “**Yang Estate**”) of Jizhe (Mary) Yang, a bankrupt, who was

the sole director of the Company, sought and obtained an order (the “**Original Receivership Order**”) pursuant to which GPGL 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 (the “**Property**”).

2. Pursuant to paragraphs 34-38 of the Original Receivership Order, the Former Receiver was authorized to conduct a claims process (the “**Original Claims Process**”).
3. On December 10, 2018, Prima Technology, Inc. sought and obtained an order (the “**Amended and Restated Receivership Order**”) pursuant to which Ernst & Young Inc. was substituted in place of GPGL as the receiver and receiver manager of the Property.
4. Pursuant to paragraph 39 of the Amended and Restated Receivership Order, the Original Claims Process was suspended, as at the time the Amended and Restated Receivership Order was pronounced, there were no available funds to distribute to the Company’s creditors.
5. As detailed further below, the Receiver has since completed the sale (the “**Sale Transaction**”) of the Company’s primary asset, consisting of a personal residence located at 2791 Highview Place, West Vancouver, BC, V7S 0A4 (the “**Highview Property**”).

#### *Remediation and sale of the Highview Property*

6. Following the granting of the Amended and Restated Receivership Order, the Receiver took possession of the Highview Property and shortly thereafter engaged Upward Construction and Renovation Ltd. to remediate the extensive water damage to the Highview Property (the “**Remediation Services**”).
7. As further detailed in the First Report of the Receiver, the Remediation Services were performed during the period of December 21, 2018 to August 30, 2019.
8. Following the completion of the Remediation Services, the Receiver engaged Sophia Zhou of Pacific Evergreen Realty Ltd. and Leo Zheng of Coldwell Banker Prestige Realty to assist in the marketing, staging, and sale of the Highview Property.
9. On September 24, 2019 the Receiver accepted an offer to purchase the Highview Property for \$5.26 million.
10. On October 29, 2019, this Honourable Court granted an Approval and Vesting Order (the “**Approval and Vesting Order**”) approving the Sale Transaction.

#### *Net Sale Proceeds*

11. The Sale Transaction closed on November 5, 2019, generating \$5,095,081.32 in proceeds (the “**Net Sale Proceeds**”).
12. Paragraphs 9-10 of the Approval and Vesting Order authorized the Receiver to make the following interim distributions (the “**Distributions**”) from the Net Sale Proceeds:
  - (a) in such amounts as the Receiver deems advisable from the net proceeds of the Property to pay the amounts owing pursuant to the Receiver’s Certificate secured

by the Receiver's Borrowings Charge (each as defined in the Amended and Restated Receivership Order); and

- (b) 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 and registered against title to the Lands under Registration No. CA3233157.
13. Upon completion of the Sale Transaction, the Receiver directed and authorized its counsel to make the Distributions, prior to transferring the remaining proceeds (the "**Remaining Proceeds**") to the Receiver, which consisted of the following:
- (a) payment to Robert J. Ellis, in trust for BMO, the sum of \$2,250,356.00, 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 \$2,243,079.28; and
    - (ii) legal and property manager fees incurred by BMO in the amount of \$7,276.60; and
  - (b) payment to the Corporation of the District of West Vancouver the sum of \$1,412.00, comprised of the following:
    - (i) outstanding property taxes payable in the amount of \$128.01;
    - (ii) outstanding utilities payable in the amount of \$909.82; and
    - (iii) outstanding fees payable for municipal tickets in the amount of \$375.00, relating to security alarm triggers at the Highview Property;
  - (c) payment to the Receiver's legal counsel in the amount of \$500.00, held in trust for final payment of utilities up to the completion date; and
  - (d) payment to the Receiver's legal counsel for \$41,200.00, held in trust for payment of speculation and vacancy tax incurred on the property for the 2018 taxation year.
14. On November 8, 2019, the Remaining Proceeds of \$2,801,612.61 were paid to the Receiver.
15. On July 29, 2020, this Honourable Court pronounced the following orders:
- (a) an order (the "**Claims Process Order**") pursuant to which the Court, *inter alia*, approved, and authorized the Receiver to conduct, a claims process (the "**Claims Process**"); and
  - (b) an order approving the Second Report of the Receiver, dated July 15, 2020 (the "**Second Report**"), the activities of the Receiver as set out in the Second Report, and the accounts of the Receiver and its counsel.

## The Transfer at Undervalue

16. As detailed further in the Second Report and the Third Report, the Receiver has, since its appointment, been pursuing the recovery of a certain transfer at undervalue (the “**TUV**”).
17. The details of the TUV, and the Receiver’s preliminary efforts to recover same, are as follows:
  - (a) 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;
  - (b) on April 2, 2018, Tian Li deposited the Bank Draft into her own account (the “**Li Payment**”);
  - (c) following its appointment, the Receiver reviewed the Li Payment and the details thereof, and it did not appear that Tian Li had provided any consideration to the Company in exchange for the Li Payment;
  - (d) on October 29, 2019, the Receiver delivered a written demand to Tian Li (the “**Tian Li Demand**”) requesting that Tian Li return the Li Payment to the Receiver within 10 days of the Tian Li Demand. The Receiver did not receive a response to the Tian Li Demand as required, or at all;
  - (e) on November 22, 2019, the Receiver filed a Notice of Civil Claim (the “**NOCC**”) to pursue the recovery of the Li Payment; and
  - (f) on December 7, 2019 and December 17, 2019, counsel to the Receiver 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.

## Activities of the Receiver since the Second Report

### *Update on the TUV*

18. As detailed further in the Third Report, the Receiver has continued to work with its legal counsel, PTI, and various third parties to obtain further information with respect of the whereabouts of Tian Li and determine the next steps with respect to the service of the NOCC.
19. However, despite these efforts, the Receiver continues to experience significant difficulties identifying Tian Li and serving Tian Li with the NOCC.
20. In addition, based on the information provided to the Receiver by PTI, the Receiver anticipates that the additional cost to pursue Tian Li and seek, *inter alia*, a substitutional service order, will likely exceed the potential recovery available to the estate. Consequently, the Receiver determined that the cost of pursuing the NOCC is likely to outweigh the potential benefit, if any, of pursuing the Company’s remedies related to the Li Payment at this time.

*Administration of the Claims Process*

21. Pursuant to the Claims Process Order:
  - (a) creditors were required to submit their proofs of claim (each a "**Claim**") to the Receiver by August 27, 2020 (the "**Claims Bar Date**"); and
  - (b) the Receiver was authorized and empowered to review all Claims received by the Claims Bar Date and determine whether to accept, revise, or disallow each POC.
22. Accordingly, and following the pronouncement of the Claims Process Order, the Receiver, *inter alia*:
  - (a) advertised and sent prescribed notices to creditors of the Company, as required by and pursuant to the terms of, the Claims Process Order;
  - (b) corresponded with the Canada Revenue Agency with respect to any potential Claim that it may have in the receivership of the Company;
  - (c) held discussions with Yang regarding the status of creditors in the estate generally, and with respect to the Yang Claim (as defined below); and
  - (d) gathered, reviewed, and determined the Claims pursuant to and in accordance with the Claims Process Order.
23. As at the Claims Bar Date, the Receiver received the following two Claims:
  - (a) an unsecured Claim in the prescribed form, filed by T&E Holdings in the amount of \$300,000.00 (the "**T&E Claim**"); and
  - (b) an email from Yang asserting that the Company is indebted to her parents in the amount of \$500,378.83 (the "**Yang Claim**").
24. Pursuant to paragraph 17 of the Claims Process Order, the Receiver reviewed the T&E Claim and the Yang Claim, and the material provided in support thereof, and made the following determinations:
  - (a) the T&E Claim was accepted in full; and
  - (b) the Yang Claim was disallowed in its entirety, and the Receiver issued a Notice of Revision or Disallowance (the "**Yang NORD**") to Yang in respect of the Yang Claim.
25. Following receipt of the Yang NORD, Yang advised the Receiver that she disputes the disallowance of the Yang Claim. Accordingly, and pursuant to paragraph 19 of the Claims Process Order, the Receiver will bring a separate application for an order affirming the Yang NORD.

*Additional activities of the Receiver*

26. In addition to the foregoing, the Receiver has also performed, *inter alia*, the following activities:

- (a) corresponded with counsel to the Former Receiver with respect to its pending application for the taxation of its fees and disbursements;
  - (b) reviewed and paid invoices and performed general administration of the Receivership;
  - (c) prepared and reviewed the Receiver's Statement of Receipts and Disbursements for the period December 10, 2018 to June 6, 2020; and
  - (d) prepared the Third Report.
27. Accordingly, the Receiver is now seeking an order from this Honourable Court approving its activities to date and as set out in the Third Report, its accounts and the accounts of its legal counsel.

### **Proposed interim distribution**

28. As detailed above and in the Third Report, the Receiver is currently holding the Remaining Proceeds (which total \$2,108,862).
29. Accordingly, at this time, the Receiver is seeking an order authorizing it to make an interim distribution from the Remaining Proceeds, up to the total amount of \$1,788,946, as follows:
- (a) \$300,000 to T&E Consulting in full satisfaction of the T&E Claim; and
  - (b) the maximum amount of \$1,488,946, to be distributed by the Receiver to the Yang Estate, as the shareholders of the Company, with sufficient funds to be held by the Receiver to satisfy the Yang Claim pending a determination by this Court.
30. The balance of the Remaining Proceeds will be held by the Receiver pending the outcome of the Former Receiver's application for the taxation of its accounts and the accounts of its counsel.

## **PART 3: LEGAL BASIS**

### **Approval of the Third Report**

1. The Third Report outlines the specific activities taken by the Receiver since the Second Report.
2. Approval of the Receiver's activities is appropriate in these circumstances because such approval will:
  - (a) allow the Receiver and other stakeholders to move forward confidently with the next steps in these Proceedings;
  - (b) bring the Receiver's activities in issue before the court, providing an opportunity for the concerns of the court and/or other stakeholders to be addressed, and any problems to be rectified in a timely way;

- (c) provides certainty and finality in these Proceedings and activities undertaken by the Receiver, while providing an opportunity for the stakeholders to raise specific objections and concerns;
- (d) enables the court, tasked with supervising these Proceedings, to satisfy itself that the Receiver's court-mandated activities have been conducted in a prudent and diligent manner;
- (e) provides protection for the Receiver, not otherwise provided by statute; and
- (f) protects creditors of the Company from delay that would be caused by:
  - (i) re-litigation of steps taken to-date; and
  - (ii) potential indemnity claims by the Receiver.

*Target Canada Co (Re)*, 2015 ONSC 7574 at paras 12, 23

3. In addition, the approval sought by the Receiver is not a general approval of its activities to date. Rather, it is the approval of the specific activities taken by the Receiver to date, all of which are outlined in the Third Report.

#### **Approval of the Receiver's fees and accounts**

4. Factors courts will consider in assessing the reasonableness of a receiver's fees include the following:
- (a) the nature, extent and value of the assets;
  - (b) the complications and difficulties encountered by the receiver;
  - (c) the degree of assistance provided by the debtor;
  - (d) the time spent by the receiver;
  - (e) the receiver's knowledge, experience and skill;
  - (f) the diligence and thoroughness displayed by the receiver;
  - (g) the responsibilities assumed;
  - (h) the results of the receiver's efforts; and
  - (i) the cost of comparable services.

Frank Bennett, *Bennett on Receiverships*  
3<sup>rd</sup> ed (Toronto: Carswell, 2011) ("**Bennett**") at 595

5. A receiver's fees must be "fair and reasonable, moderate and not generous, but sufficient to induce competent people to act as receivers."

*Vantreight v Vantreight*, 2007 BCSC 1345 at para 43

6. As held by the New Brunswick Court of Appeal:

There is no fixed rate or settled scale for determining the amount of compensation to be paid a receiver. He is usually allowed either a percentage upon his receipts or a lump sum based upon the time, trouble and degree of responsibility involved. The Governing principle appears to be that the *compensation allowed a receiver should be measured by the fair and reasonable value of his services* and while sufficient fees should be paid to induce competent persons to serve as receivers, receiverships should be administered as economically as possible. Thus allowances for services must be just, but nevertheless moderate rather than generous.

[Emphasis added]

*Federal Business Development Bank v Belyea and Fowler* (1983),  
44 NBR (2d) 248 at para 3, 1983 CanLII 4086 (CA)

7. It is not necessary to go through the supporting documentation for the fees, line by line, in order to determine what the appropriate fees are. Nor will the court second-guess the amount of time spent by a receiver unless it is clearly excessive or overreaching.

*Bank of Nova Scotia v Diemer*, 2014 ONSC 365 at para 19

8. Similar factors are considered in the assessment of the legal accounts of counsel to the receiver, including:

- (a) the time expended;
- (b) the complexity of the receivership;
- (c) the degree of responsibility assumed by the lawyers;
- (d) the amount of money involved, including the amount of proceeds after payments to the creditors;
- (e) the degree and skill of the lawyers involved;
- (f) the results achieved; and
- (g) the client's expectations as to the fee.

*Bennett* at 600

9. The Receiver submits that its fees are fair and reasonable in the circumstances, particularly in light of the significant time and effort expended by the Receiver in performing the activities detailed in the Third Report.

10. Similarly, the Receiver submits that its counsel's fees and disbursements are fair, reasonable and consistent with the market for similar legal services in British Columbia.

**PART 4: MATERIAL TO BE RELIED UPON**

1. *Law and Equity Act*, RSBC 1996 c 253, and in particular section 64 thereof;

2. the Second Report of the Receiver, dated July 15, 2020;
3. the Third Report of the Receiver, dated December 4, 2020;
4. Affidavit #5 of Holly Palmer, made December 4, 2020;
5. Affidavit #3 of H. Lance Williams, made December 4, 2020;
6. the pleadings and other material filed herein; and
7. such further and other material as counsel may advise and this Honourable Court accept.

The applicant estimates that the Application will take 10 minutes.

This matter is not within the jurisdiction of a Master.

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

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

Date: December 4, 2020



Signature of Lawyer for the Applicants  
Cassels Brock & Blackwell LLP  
(Jared Enns and Forrest Finn)

To be completed by the Court only:

Order made

☐ in the terms requested in paragraphs \_\_\_\_\_ of Part 1 of this Notice of Application

☐ with the following variations and additional terms:

\_\_\_\_\_  
\_\_\_\_\_

Date: \_\_\_\_\_

Signature of ☐ Judge ☐ Master

## APPENDIX

### THIS APPLICATION INVOLVES THE FOLLOWING:

- ☐ discovery: comply with demand for documents
- ☐ discovery: production of additional documents
- ☐ other matters concerning document discovery
- ☐ extend oral discovery
- ☐ other matter concerning oral discovery
- ☐ amend pleadings
- ☐ add/change parties
- ☐ summary judgment
- ☐ summary trial
- ☐ service
- ☐ mediation
- ☐ adjournments
- ☐ proceedings at trial
- ☐ case plan orders: amend
- ☐ case plan orders: other
- ☐ experts
- ☒ other

## SCHEDULE "A"

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

### 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.

### SERVICE LIST (RE: PE CONSULTING LTD.)

|                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Burns Fitzpatrick LLP</b><br/>1400 – 510 Burrard Street<br/>Vancouver, BC V6C 3A8<br/>Tel: (604) 685-0121</p> <p>Attn: Dennis K. Fitzpatrick</p> <p>Email: <a href="mailto:dfitzpatrick@burnsfitz.com">dfitzpatrick@burnsfitz.com</a></p> <p><b><i>Counsel for G. Powroznik Group Inc.,<br/>Former Receiver of PE Consulting Ltd.</i></b></p>                                           | <p><b>Cassels Brock &amp; Blackwell LLP</b><br/>Suite 2200 HSBC Building<br/>885 West Georgia Street<br/>Vancouver, BC V6C 3E8<br/>Tel: (604) 691-6100</p> <p>Attn: H. Lance Williams and<br/>Mary I.A. Buttery, Q.C.</p> <p>Email: <a href="mailto:lwilliams@cassels.com">lwilliams@cassels.com</a><br/><a href="mailto:mbuttery@cassels.com">mbuttery@cassels.com</a><br/><a href="mailto:jenns@cassels.com">jenns@cassels.com</a><br/><a href="mailto:sdanielisz@cassels.com">sdanielisz@cassels.com</a></p> <p><b><i>Counsel for Ernst &amp; Young Inc.,<br/>Receiver of PE Consulting Ltd.</i></b></p> |
| <p><b>Ernst &amp; Young Inc.</b><br/>700 West Georgia Street<br/>PO Box 10101<br/>Vancouver, BC V7Y 1C7<br/>Tel: (604) 891-8200</p> <p>Attn: Holly Palmer and Jason Eckford</p> <p>Email: <a href="mailto:Holly.Palmer@ca.ey.com">Holly.Palmer@ca.ey.com</a><br/><a href="mailto:Jason.Eckford@ca.ey.com">Jason.Eckford@ca.ey.com</a></p> <p><b><i>Receiver of PE Consulting Ltd.</i></b></p> | <p><b>Miller Thomson LLP</b><br/>725 Granville Street, Suite 400<br/>Vancouver, BC V7Y 1G5<br/>Tel: (604) 687-2242</p> <p>Attn: Gordon G. Plottel and Steven Evans</p> <p>Email: <a href="mailto:gplottel@millerthomson.com">gplottel@millerthomson.com</a><br/><a href="mailto:sevans@millerthomson.com">sevans@millerthomson.com</a></p> <p><b><i>Counsel for Prima Technology Inc., T&amp;E<br/>Holdings Ltd., and Alacria Asia Capital Inc.</i></b></p>                                                                                                                                                 |

## SCHEDULE "B"

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

### 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.

### ORDER MADE AFTER APPLICATION

BEFORE THE HONOURABLE

\_\_\_\_\_

)  
)  
)  
)

WEDNESDAY, THE 16<sup>TH</sup> DAY  
OF DECEMBER, 2020

THE APPLICATION of Ernst & Young Inc., in its capacity as court-appointed receiver and receiver manager (the "**Receiver**") of the assets, undertakings and property of PE Consulting Ltd. (the "**Company**") coming on for hearing, by telephone, at Vancouver, British Columbia, on the 16<sup>th</sup> day of December, 2020; AND ON HEARING Jared Enns, counsel for the Receiver, and those other counsel listed on **Schedule "A"** hereto, and no one appearing for the Respondents, although duly served; AND UPON READING the material filed herein, including the Third Report of the Receiver dated December 4, 2020 (the "**Third Report**"), the Fifth Affidavit of Holly Palmer made December 4, 2020 (the "**Fifth Palmer Affidavit**"), and the Third Affidavit of H. Lance Williams made December 4, 2020 (the "**Third Williams Affidavit**");

THIS COURT ORDERS THAT:

#### Approval of the Receiver's Actions and Accounts

1. The Third Report and the activities of the Receiver referred to therein, be and are hereby approved; provided, however, that only the Receiver, in its personal capacity and only with respect to its own personal liability, shall be entitled to rely upon or utilize in any way such approval.

2. The accounts of the Receiver and its counsel, Cassels Brock & Blackwell LLP, as described in the Third Report, the Fifth Palmer Affidavit, and the Third Williams Affidavit, are hereby approved.
3. The Receiver be and is hereby authorised to make an interim distribution, in the maximum amount of \$1,788,946, as follows:
  - (a) a distribution to T&E Holding Ltd. ("**T&E**") in the amount of \$300,000, in full and final satisfaction of T&E's claim against the Company as particularized in its proof of claim dated August 25, 2020, and which claim is an "Allowed Claim" pursuant to and in accordance with the provisions of the Claims Process Order pronounced in these proceedings on July 29, 2020 (the "**CPO**");
  - (b) a distribution to the bankruptcy estate of Jizhe (Mary) Yang ("**Yang**"), in the maximum amount of \$1,488,946, provided that sufficient funds shall be held by the Receiver pending the resolution or determination, by this Court, of Yang's claim against the Company pursuant to and in accordance with the provisions of the CPO.

Endorsement

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

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

---

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

BY THE COURT

---

REGISTRAR

**SCHEDULE "A"**  
**LIST OF COUNSEL**

| NAME | PARTY REPRESENTED |
|------|-------------------|
|      |                   |
|      |                   |
|      |                   |
|      |                   |

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

**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.

---

**NOTICE OF APPLICATION**

---

**CASSELS BROCK & BLACKWELL LLP**  
Barristers & Solicitors  
2200 – 885 West Georgia Street  
Vancouver, B.C. V6C 3E8  
Telephone: (604) 691-6100  
Facsimile: (604) 691-6120

Matter No. 25522-17

JE/sd