

**COURT OF APPEAL FOR ONTARIO**

**BETWEEN:**

**ROMSPEN INVESTMENT CORPORATION**

**Applicant**

**and**

**TUNG KEE INVESTMENT CANADA LTD AND TUNG KEE INVESTMENT LIMITED  
PARTNERSHIP**

**Respondents**

**SUPPLEMENTARY AFFIDAVIT OF HUNTER LAM**

**I, HUNTER LAM, in the City of Toronto, in the Province of Ontario, MAKE OATH AND  
SAY AS FOLLOWS:**

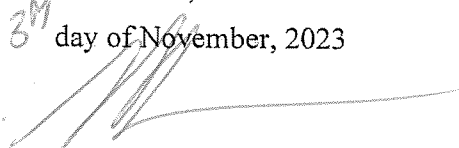
1. This is to supplement my Affidavit, sworn on November 3, 2023. Attached hereto and marked as Exhibit "A" to this my affidavit is a true copy of a letter from Mayor Scarpitti, the Mayor of the City of Markham.

SWORN BEFORE ME at )

The City of Toronto, Province ) *Via Videoconference*

Of Ontario, this )

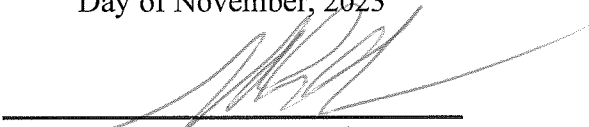
3<sup>rd</sup> day of November, 2023 )

  
Commissioner for Taking Affidavits



**HUNTER LAM**

This is **Exhibit "A"** referred to  
in the Affidavit of Hunter Lam  
Sworn before me this 3<sup>rd</sup>  
Day of November, 2023



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Commissioned by Mark A. Klaiman  
LSO#, 21724T

To whom it may concern:

The City of Markham has been in active discussions with the Lee Li Group for several months on the One Markham Project. One Markham is a development proposal for the design and construction of a major film studio at 3143 19th Avenue in Markham Ontario. The land was appropriately zoned for a major film studio through a Minister's Zoning Order (MZO), and is located in an area that the City of Markham refers to as the Markham Innovation Exchange (MiX). The MiX will be Ontario's first innovation cluster that connects knowledge and production clusters. Located on 1,920 acres directly adjacent to Highway 404, MiX will create a one-stop destination for research, training and production facilities, and strengthen the domestic supply chain.

Prior to our discussions with the Lee Li Group, the City of Markham was already in the process of working towards developing a portion of the lands at 3143 19th Avenue as a major film studio. The City of Markham was supportive of this project. Unfortunately, the previous party was unable to complete the process.

The Lee Li Group has been actively conducting due diligence on this project, including the due diligence for land acquisition to secure a major film studio for these lands which were rezoned for a film studio through an MZO. Since the land at 3143 19th Avenue was publicly listed for sale, the Lee Li Group has continued to pursue the development of a major film studio in accordance with the original plan.

The Lee Li Group has had numerous meetings with both the City of Markham and the film studio in an effort to advance the development of a major film studio in Markham. The proposed film studio is expected to create over 500 full-time highly skilled jobs.

The Lee Li Group is committed to finalizing the acquisition agreement to advance the proposed film studio project and development on the lands at 3134 19th Avenue. Throughout this process, the Lee Li Group, who have been in the co-packing business with Coca-Cola for the past three (3) decades, have also expressed an interest to invest significant capital in the City of Markham to construct the most advanced state-of-the-art Beverage Production Plant in the 19th Avenue area, in line with the Markham Innovative Exchange (MiX) vision.



*Frank Scarpitti*  
Mayor

The creation of approximately 1,000 or more full-time highly skilled jobs by the Lee Li Group will have a very positive impact on the City of Markham.

The City of Markham have been in active discussion with the Lee Li Group for approximately 6 months regarding the development of the proposed Beverage Production Plant, including numerous meetings on required engineering studies, an economic impact study, and utilities servicing.

The City of Markham is in active productive discussions with the Lee Li Group on both proposals.

Sincerely,

*Frank Scarpitti*

Frank Scarpitti  
Mayor

ROMSPEN INVESTMENT CORPORATION

-and-

TUNG KEE INVESTMENT CANADA LTD et al

Applicant

Respondents

Court of Appeal File No. 23-00703161-00CL  
Court File No.: CV-23-00703616-00CL

**ONTARIO**  
**SUPERIOR COURT OF APPEAL**

**SUPPLEMENTARY AFFIDAVIT  
OF HUNTER LAM**

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