



This is the supplemental affidavit of  
Robert Douglas in this case and  
was made on April 23, 2026

No. S-262220  
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN

**OPTRUST JOYCE FINANCING CORP.**

PETITIONER

AND

**5055 JOYCE HOLDINGS INC.**

**and**

**5055 JOYCE PROPERTY INC.**

RESPONDENTS

**AFFIDAVIT**

I, Robert Douglas, of Toronto, in the Province of Ontario, President of OPTrust Joyce Financing Corp. ("**OPTrust**"), SWEAR THAT:

1. I am the President and a Director of OPTrust and am an employee of OPSEU Pension Plan Trust Fund ("**OPSEU**"). OPTrust is a wholly owned subsidiary of OPSEU. As such, I have personal knowledge of the matters deposed to in this affidavit, except where I depose to a matter based on information from an informant I identify, in which case I am informed and believe that both the information from the informant and the resulting statement are true.

2. I make this affidavit supplemental to the previous affidavit I swore in this matter on March 26, 2026 (the "**First Affidavit**"). Capitalized terms used but not otherwise defined in this supplemental affidavit have the meanings given to such terms in my First Affidavit.

3. Since the date of my First Affidavit, the following additional claims of builders' lien have been filed, or submitted for filing, against the Property:


- (a) a claim of builders' lien filed against the Property on April 2, 2026 by Crown Building Supplies Ltd. in the amount of \$36,234.19, a copy of which is attached hereto as **Exhibit "A"**;
- (b) a claim of builders' lien submitted for filing against the Property on April 22, 2026 by Crystal Consulting (Waterproofing) Inc. in the amount of \$329,302.09, a copy of which is attached hereto as **Exhibit "B"**;
- (c) a claim of builders' lien submitted for filing against the Property on April 22, 2026 by Crystal Consulting Inc. in the amount of \$572,456.06, a copy of which is attached hereto as **Exhibit "C"**;
- (d) a claim of builders' lien submitted for filing against the Property on April 22, 2026 by Bluecon Contracting Ltd. in the amount of \$460,825.41, a copy of which is attached hereto as **Exhibit "D"**;
- (e) a claim of builders' lien submitted for filing against the Property on April 22, 2026 by Kanin Construction Management Inc. in the amount of \$2,322,915.00, a copy of which is attached hereto as **Exhibit "E"**; and
- (f) a claim of builders' lien submitted for filing against the Property on April 23, 2026 by Grand Shine Ltd. in the amount of \$270,313.77, a copy of which is attached hereto as **Exhibit "F"**.

4. As at the date of this supplemental affidavit, 11 claims of builders' lien have been filed, or submitted for filing, against the Property, totalling in excess of \$10 million.

SWORN BEFORE ME over )  
videoconference this 23<sup>rd</sup> day of April, )  
2026 in accordance with O. Reg. 431/20, )  
Administering Oath or Declaration )  
Remotely. The affiant is located in the )  
City of Toronto, in the Province of )  
Ontario and the commissioner is located )  
in the City of Toronto, in the Province of )  
Ontario. )

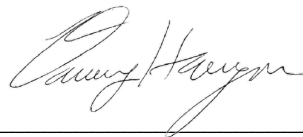


Commissioner for Taking Affidavits  
(or as may be)



ROBERT A.S. DOUGLAS

This is Exhibit "A" referred to in the Supplemental Affidavit of Robert Douglas sworn at the City of Toronto, in the Province of Ontario, before me on April 23, 2026, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

A handwritten signature in cursive script, appearing to read "Cathy Hayman", written in black ink.

---

Commissioner for Taking Affidavits (or as may be)



Builders Lien Act  
**Claim of Lien**  
Province of British Columbia

**NEW WESTMINSTER LAND TITLE OFFICE**  
APR 02 2026 13:28:21.001  
**CB2716742**

Application

Document Fees: \$0.00

**Herr Law Group**  
**Unit 211, 15240 56 Avenue**  
**Surrey BC V3S 5K7**  
**604-372-0499**

I, **Kanwar Herr** of **c/o: Herr Law Group Unit 211, 15240 56 Avenue, Surrey BC V3S 5K7**, agent of the **lien claimant** state that:

- Crown Building Supplies Ltd. , Inc No BC1457233**  
of **7550 132 Street, Surrey BC V3W 4M7** claims a lien against the following land:

PID/Plan Number	Legal Description
<b>024-143-111</b>	<b>LOT I BLOCK 17 DISTRICT LOT 51 GROUP 1 NEW WESTMINSTER DISTRICT PLAN LMP37967</b>

- A general description of the work done or material supplied, or to be done or supplied, or both, is as follows:  
**Supply of construction and building material products.**
- The person who engaged the lien claimant, or to whom the lien claimant supplied material, and who is or will become indebted to the lien claimant is:  
**5055 Joyce Holdings Inc.**
- The sum of **\$36,234.19** is or will become due and owing to **Crown Building Supplies Ltd.** on **2026-03-03**
- The lien claimant's address for service is:  
**c/o: Herr Law Group Unit 211, 15240 56 Avenue, Surrey BC V3S 5K7**

Signature  
X

Date (YYYY-MM-DD)  
**2026-04-02**

**Note:** Section 45 of the *Builders Lien Act* provides as follows:

- 45 (1) A person who knowingly files or causes an agent to file claim of lien containing a false statement commits an offence.
- (2) A person who commits an offence under subsection (1) is liable to a fine not exceeding the greater of \$2,000 and the amount by which the stated claim exceeds the actual claim.

**Electronic Signature**

Your electronic signature is a representation that you are a designate authorized to certify this document under section 168.4 of the *Land Title Act*, RSBC 1996, c 250, that you certify this document under section 168.41 (4) of the Act, and that an execution copy, or a true copy of that execution copy, is in your possession.

**Navneet Gill**  
**L6QS9M**

Digitally signed by  
Navneet Gill L6QS9M  
Date: 2026-04-02  
13:28:16 -07:00

This is Exhibit “B” referred to in the Supplemental Affidavit of Robert Douglas sworn at the City of Toronto, in the Province of Ontario, before me on April 23, 2026, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

A handwritten signature in cursive script, appearing to read "Cheryl Hayden".

---

Commissioner for Taking Affidavits (or as may be)



Builders Lien Act  
**Claim of Lien**  
Province of British Columbia

**NEW WESTMINSTER LAND TITLE OFFICE**  
APR 22 2026 13:53:36.001  
**CB2748274**

Application

Document Fees: \$0.00

**Ryan A. Shaw**  
**Richards Buell Sutton LLP**  
**700-401 West Georgia Street**  
**Vancouver BC V6B 5A1**  
**604.682.3664**

CCI (Waterproofing) - Joyce Project

I, **Garry Sangha** of **1100 - 21320 Westminster Highway, Richmond BC V6V 2X5**, agent of the lien claimant state that:

1. **Crystal Consulting (Waterproofing) Inc.**

of **1100-21320 Westminster Highway, Richmond BC V6V 2X5** claims a lien against the following land:

PTD/Plan Number      Legal Description

**024-143-111      LOT I BLOCK 17 DISTRICT LOT 51 GROUP 1 NEW WESTMINSTER DISTRICT PLAN LMP37967**

2. A general description of the work done or material supplied, or to be done or supplied, or both, is as follows:

**supply labour and materials to install complete roofing systems, waterproofing systems and all related flasing**

3. The person who engaged the lien claimant, or to whom the lien claimant supplied material, and who is or will become indebted to the lien claimant is:

**5055 Joyce Holdings Inc.**

4. The sum of **\$329,302.09** is or will become due and owing to **Crystal Consulting (Waterproofing) Inc.** on **2026-03-31**

5. The lien claimant's address for service is:

**c/o Richards Buell Sutton LLP; Attn: Ryan Shaw 700-401 West Georgia Street, Vancouver BC V6B 5A1**

Signature

Date (YYYY-MM-DD)

X

**2026-04-22**

**Note:** Section 45 of the *Builders Lien Act* provides as follows:

45 (1) A person who knowingly files or causes an agent to file claim of lien containing a false statement commits an offence.

(2) A person who commits an offence under subsection (1) is liable to a fine not exceeding the greater of \$2,000 and the amount by which the stated claim exceeds the actual claim.

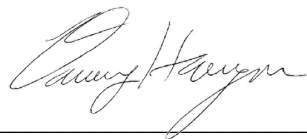
**Electronic Signature**

Your electronic signature is a representation that you are a designate authorized to certify this document under section 168.4 of the *Land Title Act*, RSBC 1996, c 250, that you certify this document under section 168.41 (4) of the Act, and that an execution copy, or a true copy of that execution copy, is in your possession.

**Ryan Alexander**  
**Shaw 7LFX55**

Digitally signed by  
Ryan Alexander Shaw 7LFX55  
Date: 2026-04-22  
13:48:18 -07:00

This is Exhibit "C" referred to in the Supplemental Affidavit of Robert Douglas sworn at the City of Toronto, in the Province of Ontario, before me on April 23, 2026, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

A handwritten signature in cursive script, appearing to read "Cathy Haynes".

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Commissioner for Taking Affidavits (or as may be)



Builders Lien Act  
**Claim of Lien**  
Province of British Columbia

**NEW WESTMINSTER LAND TITLE OFFICE**  
APR 22 2026 13:51:15.001  
**CB2748264**

Application

Document Fees: \$0.00

**Ryan A. Shaw**  
**Richards Buell Sutton LLP**  
**700-401 West Georgia Street**  
**Vancouver BC V6B 5A1**  
**604.682.3664**

CCI - Joyce Project

I, **Garry Sangha** of **1100 - 21320 Westminster Highway, Richmond BC V6V 2X5**, agent of the lien claimant state that:

1. **Crystal Consuting Inc.**

of **1100-21320 Westminster Highway, Richmond BC V6V 2X5** claims a lien against the following land:

PTD/Plan Number      Legal Description

**024-143-111      LOT I BLOCK 17 DISTRICT LOT 51 GROUP 1 NEW WESTMINSTER DISTRICT PLAN LMP37967**

2. A general description of the work done or material supplied, or to be done or supplied, or both, is as follows:

**Providing material and labor for drywall work**

3. The person who engaged the lien claimant, or to whom the lien claimant supplied material, and who is or will become indebted to the lien claimant is:

**5055 Joyce Holdings Inc.**

4. The sum of **\$572,456.06** is or will become due and owing to **Crystal Consuting Inc.** on **2025-12-31**

5. The lien claimant's address for service is:

**c/o Richards Buell Sutton LLP; Attn: Ryan Shaw 700-401 West Georgia Street, Vancouver BC V6B 5A1**

Signature

Date (YYYY-MM-DD)

X

**2026-04-22**

**Note:** Section 45 of the *Builders Lien Act* provides as follows:

45 (1) A person who knowingly files or causes an agent to file claim of lien containing a false statement commits an offence.

(2) A person who commits an offence under subsection (1) is liable to a fine not exceeding the greater of \$2,000 and the amount by which the stated claim exceeds the actual claim.

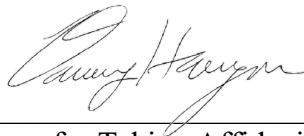
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**Ryan Alexander**  
**Shaw 7LFX55**

Digitally signed by  
Ryan Alexander Shaw 7LFX55  
Date: 2026-04-22  
13:48:58 -07:00

This is Exhibit “D” referred to in the Supplemental Affidavit of Robert Douglas sworn at the City of Toronto, in the Province of Ontario, before me on April 23, 2026, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

A handwritten signature in cursive script, appearing to read "Cheryl Hayden".

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Commissioner for Taking Affidavits (or as may be)



Builders Lien Act  
**Claim of Lien**  
Province of British Columbia

**NEW WESTMINSTER LAND TITLE OFFICE**  
APR 22 2026 15:13:57.001  
**CB2748487**

Application

Document Fees: \$0.00

**Virsa Law Group LLP Barrister & Solicitors**  
115 - 5455 152 Street  
Surrey BC V3S 5A5  
778.900.0900

I, **Ranjit Chauhan** of **c/o 115 - 5455 152 Street, Surrey BC V3S 5A5**, state that:

1. **BLUECON CONTRACTING LTD. , Inc No BC1156953**

of **c/o 115 - 5455 152 Street, Surrey BC V3S 5A5** claims a lien against the following land:

PID/Plan Number      Legal Description

**024-143-111      LOT I BLOCK 17 DISTRICT LOT 51 GROUP 1 NEW WESTMINSTER DISTRICT PLAN LMP37967**

2. A general description of the work done or material supplied, or to be done or supplied, or both, is as follows:

**Offsite electrical work including: mobilization, demobilization, obtaining electrical permits from the municipality, utility scanning, installation and supplies provided for 7 street lights, excavation, material disposal, trenching preparation including bases and conduit installation, coordinating inspection with the municipality and utility providers, backfill and compaction, electrical supply and installation to the subject site, termination and connections to existing CoV Kiosk, communication and TS conduit supply and installation, public property temporary cold patch restoration, obtaining connections, redline drawings and permit closeouts, interest accrued, and all ancillary work thereto including but not limited to communications, and change orders.**

3. The person who engaged the lien claimant, or to whom the lien claimant supplied material, and who is or will become indebted to the lien claimant is:

**Kanin Construction Management Inc. and 5055 Joyce Holdings Inc.**

4. The sum of **\$460,825.41** is or will become due and owing to **BLUECON CONTRACTING LTD.** on **2026-04-06**

5. The lien claimant's address for service is:

**22334 MCINTOSH AVENUE, MAPLE RIDGE BC V2X 3C1**

Signature

X

Date (YYYY-MM-DD)

**2026-04-22**

**Note:** Section 45 of the *Builders Lien Act* provides as follows:

45 (1) A person who knowingly files or causes an agent to file claim of lien containing a false statement commits an offence.

(2) A person who commits an offence under subsection (1) is liable to a fine not exceeding the greater of \$2,000 and the amount by which the stated claim exceeds the actual claim.

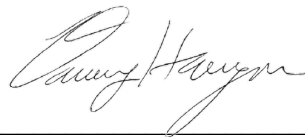
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**Mankaranjeet Singh Gill UAPISI**

**Digitally signed by Mankaranjeet Singh Gill UAPISI  
Date: 2026-04-22 15:13:50 -07:00**

This is Exhibit “E” referred to in the Supplemental Affidavit of Robert Douglas sworn at the City of Toronto, in the Province of Ontario, before me on April 23, 2026, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

A handwritten signature in cursive script, appearing to read "Cheryl Hayden".

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Commissioner for Taking Affidavits (or as may be)



Builders Lien Act  
**Claim of Lien**  
Province of British Columbia

**NEW WESTMINSTER LAND TITLE OFFICE**  
APR 22 2026 13:52:29.001  
**CB2748267**

Application

Document Fees: \$0.00

**Ryan A. Shaw**  
**Richards Buell Sutton LLP**  
**700-401 West Georgia Street**  
**Vancouver BC V6B 5A1**  
**604.682.3664**

KCM - Joyce Project

I, **Garry Sangha** of **1100 - 21320 Westminster Highway, Richmond BC V6V 2X5**, agent of the lien claimant state that:

1. **Kanin Construction Management Inc.**

of **1100-21320 Westminster Highway, Richmond BC V6V 2X5** claims a lien against the following land:

PTD/Plan Number      Legal Description

**024-143-111      LOT I BLOCK 17 DISTRICT LOT 51 GROUP 1 NEW WESTMINSTER DISTRICT PLAN LMP37967**

2. A general description of the work done or material supplied, or to be done or supplied, or both, is as follows:

**Construction Management Services**

3. The person who engaged the lien claimant, or to whom the lien claimant supplied material, and who is or will become indebted to the lien claimant is:

**5055 Joyce Holdings Inc.**

4. The sum of **\$2,322,915.00** is or will become due and owing to **Kanin Construction Management Inc.** on **2026-03-31**

5. The lien claimant's address for service is:

**c/o Richards Buell Sutton LLP; Attn: Ryan Shaw 700-401 West Georgia Street, Vancouver BC V6B 5A1**

Signature

Date (YYYY-MM-DD)

X

**2026-04-22**

**Note:** Section 45 of the *Builders Lien Act* provides as follows:

45 (1) A person who knowingly files or causes an agent to file claim of lien containing a false statement commits an offence.

(2) A person who commits an offence under subsection (1) is liable to a fine not exceeding the greater of \$2,000 and the amount by which the stated claim exceeds the actual claim.

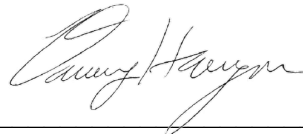
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**Ryan Alexander**  
**Shaw 7LFX55**

Digitally signed by  
Ryan Alexander Shaw 7LFX55  
Date: 2026-04-22  
13:48:44 -07:00

This is Exhibit "F" referred to in the Supplemental Affidavit of Robert Douglas sworn at the City of Toronto, in the Province of Ontario, before me on April 23, 2026, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

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Commissioner for Taking Affidavits (or as may be)



Builders Lien Act  
**Claim of Lien**  
Province of British Columbia

**NEW WESTMINSTER LAND TITLE OFFICE**  
APR 23 2026 10:17:11.001  
**CB2749991**

Application

Document Fees: \$0.00

**Gurlane Bhanwar Notary Corporation**  
2115 - 4871 Shell Road  
Richmond BC V6X 3Z6  
604-447-0100

File Matter No.: 261209BL - Grand

I, **Gagandeep Singh Virk** of **20275 27 Ave, Langley BC V2Z 0B6**, state that:

1. **GRAND SHINE LTD. , Inc No BC1463671**  
of **20275 27 Ave, Langley BC V2Z 0B6** claims a lien against the following land:

PID/Plan Number	Legal Description
<b>024-143-111</b>	<b>LOT I BLOCK 17 DISTRICT LOT 51 GROUP 1 NEW WESTMINSTER DISTRICT PLAN LMP37967</b>

2. A general description of the work done or material supplied, or to be done or supplied, or both, is as follows:  
**All work performed under the original contract dated May 16, 2025, including but not limited to, the following invoices: GS004-001, GS004-002, GS004-003, GS004-004, GS004-005, and GS004-006.**
3. The person who engaged the lien claimant, or to whom the lien claimant supplied material, and who is or will become indebted to the lien claimant is:  
**5055 Joyce Holdings Inc.**
4. The sum of **\$270,313.77** is or will become due and owing to **GRAND SHINE LTD.** on **2026-03-20**
5. The lien claimant's address for service is:  
**20275 27 Ave, Langley BC V4N 6T8**

Signature

X

Date (YYYY-MM-DD)

**2026-04-23**

**Note:** Section 45 of the *Builders Lien Act* provides as follows:

- 45 (1) A person who knowingly files or causes an agent to file claim of lien containing a false statement commits an offence.
- (2) A person who commits an offence under subsection (1) is liable to a fine not exceeding the greater of \$2,000 and the amount by which the stated claim exceeds the actual claim.

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**Gurlane**  
**Bhanwar L92E37**

Digitally signed by  
Gurlane Bhanwar L92E37  
Date: 2026-04-23  
10:14:27 -07:00