



This is the 1<sup>st</sup> affidavit  
of Pamela Ang in this case  
and was made on May 6, 2026

No. S260086  
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

BETWEEN:

MCAP FINANCIAL CORPORATION

PETITIONER

AND:

MASKEEN 177 PROJECTS LTD., 0676086 B.C. LTD., MASKEEN DEVELOPMENT LTD.,  
MASKEEN HOMES LTD., 1302095 B.C. LTD., 0943151 B.C. LTD., 0816980 B.C. LTD., 0816984  
B.C. LTD., PRO RIDGE HOMES LTD., PRORIDGE VENTURES INC., JAGDIP SINGH SIVIA,  
AMARJIT KAUR SIVIA, JATINDERPAL SINGH GILL, HARBANS KAUR GILL, PRABHDEV  
SINGH KHERA, FIRST WEST CREDIT UNION, TOKIO MARINE CANADA LTD., VANCOUVER  
CITY SAVINGS CREDIT UNION, BMW CANADA INC., FRONT STREET LEASING LP O/A  
DILAWRI LEASING, OPENROAD LEASING, TD AUTO FINANCE (CANADA) INC., COUNTRY  
GREEN EXCAVATING LIMITED, 1299615 B.C. LTD., NEXGEN ENVIRONMENTAL SERVICES  
LTD., INTEGRITY SHORING & CIVIL LTD. WITH ASSUMED NAME: ISC SHORING & CIVIL  
LTD., MADNESS FORMING & CONSTRUCTION SERVICES INC., and  
PDQ CONSTRUCTION LTD.

RESPONDENTS

**AFFIDAVIT**

I, Pamela Ang, of 1006 W 45th Ave, Vancouver, British Columbia, Legal Assistant, AFFIRM  
THAT:

1. I am a legal assistant with the law firm of Osler, Hoskin & Harcourt LLP (“**Osler**”), counsel to the court-appointed receiver in this case, KSV Restructuring Inc. (the “**Receiver**”), and as such have personal knowledge of the matters to which I now depose except where stated to be based on information and belief and where so stated I state the source of my information and believe them to be true.
2. On May 6, 2026, I called Peter Loewen, counsel for Integrity Shoring & Civil Ltd. Mr. Loewen confirmed that Integrity Shoring & Civil Ltd. takes no position on the Receiver’s application for a sales process order.

3. On May 6, 2026, I called Adnan Habib, counsel for Country Green Excavating Limited. Mr. Habib asked to be sent the materials for the Receiver's application for a sales process order.
4. Maya Churilov, counsel to the Receiver, sent the materials to Mr. Habib at his email [ahabib@bakernewby.com](mailto:ahabib@bakernewby.com). Mr. Habib confirmed that Country Green Excavating Limited takes no position on the Receiver's application for a sales process order. Attached as **Exhibit "A"** to this affidavit is a true copy of the email chain between Ms. Churilov and Mr. Habib.
5. On May 6, 2026, Ms. Churilov also sent the materials for the Receiver's application for a sales process order to Benjamin Lorimer, counsel for Yard at a Time Concrete Ltd., at his email [blorimer@bakernewby.com](mailto:blorimer@bakernewby.com). Mr. Lorimer confirmed that Yard at a Time Concrete Ltd. takes no position on the Receiver's application for a sales process order. Attached as **Exhibit "B"** to this affidavit is a true copy of the email chain between Ms. Churilov and Mr. Lorimer.
6. On May 6, 2026, I called Madness Forming and Construction Services Ltd. and spoke with a representative named Dimitri. Dimitri confirmed that Madness Forming and Construction Services Ltd. takes no position on the Receiver's application for a sales process order.
7. On May 6, 2026, I called PDQ Construction Ltd. and spoke to a representative named Dan Morley. Mr. Morley confirmed that PDQ Construction Ltd. takes no position on the Receiver's application for a sales process order.
8. On May 6, 2026, I called NexGen Environmental Services Ltd. and spoke to a representative that asked to be emailed the materials for the Receiver's application for a sales process order at the email [ap@nexgenenv.com](mailto:ap@nexgenenv.com).
9. Ms. Churilov sent the materials to [ap@nexgenenv.com](mailto:ap@nexgenenv.com). Manoj Nair, a representative of NexGen Environmental Services Ltd., responded to Ms. Churilov and confirmed that NexGen Environmental Services Ltd. takes no position on the Receiver's application for a



This is Exhibit "A" referred to in the  
Affidavit #1 of Pamela Ang sworn before  
me at Vancouver, BC,  
this 6th day of May 2026



---

A Commissioner/Notary Public for the  
Province of British Columbia

**Churilov, Maya**

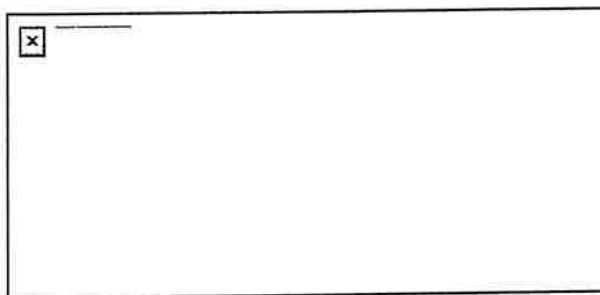
**From:** Adnan N. Habib <AHabib@bakernewby.com>  
**Sent:** Wednesday, May 06, 2026 11:49 AM  
**To:** Churilov, Maya  
**Cc:** Newbery, Emma; Ang, Pam; Benjamin J. Lorimer; Melissa S. Taylor  
**Subject:** RE: MCAP Financial Corporation v. Maskeen 177 Projects Ltd. et al. Vancouver Registry - S-260086

Country Green Excavating Limited takes no position.

**Adnan N. Habib**

Partner\* | Mediator  
 \* Practicing through Adnan N. Habib Law Corporation

em. [AHabib@bakernewby.com](mailto:AHabib@bakernewby.com)  
 ph. 1.604.852.3646  
 dir. 1.604.864.3803  
 fax. 1.604.852.5194  
 w. [bakernewby.com](http://bakernewby.com)  
 200 – 2955 Gladwin Rd, Abbotsford BC V2T 5T4



**We acknowledge that we are honoured to live and work on the traditional, ancestral and unceded territory of the Stó:lō Coast Salish peoples.**

We ask that you kindly forward all correspondence and documentation via email or CD/USB. Please note we do not accept service of all documents via email. Please check with the lawyer prior to serving records and reports via email. We appreciate your assistance in this regard. Please consider the environment before printing this email message.

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**From:** Churilov, Maya <mchurilov@osler.com>

**Sent:** Wednesday, May 6, 2026 11:37 AM

**To:** Adnan N. Habib <AHabib@bakernewby.com>

**Cc:** Newbery, Emma <enewbery@osler.com>; Ang, Pam <pang@osler.com>; Benjamin J. Lorimer <BLorimer@bakernewby.com>; Melissa S. Taylor <MTaylor@bakernewby.com>

**Subject:** RE: MCAP Financial Corporation v. Maskeen 177 Projects Ltd. et al. Vancouver Registry - S-260086

The Receivership Order was granted on January 14, 2026, it is attached as Appendix "A" to the Report we sent you. Per paragraph 1 of the Order, the Receiver was appointed on March 16, 2026, as the conditions in the Order were met.

We will correct the service list moving forward to note that you are counsel to Country Green and service will list your email and Melissa's email going forward. Please advise if there are any other representatives to add.

We look forward to your position.

**OSLER**

Maya Churilov  
 Associate

**From:** Adnan N. Habib <[AHabib@bakernewby.com](mailto:AHabib@bakernewby.com)>  
**Sent:** Wednesday, May 06, 2026 11:31 AM  
**To:** Churilov, Maya <[mchurilov@osler.com](mailto:mchurilov@osler.com)>  
**Cc:** Newbery, Emma <[enewbery@osler.com](mailto:enewbery@osler.com)>; Ang, Pam <[pang@osler.com](mailto:pang@osler.com)>; Benjamin J. Lorimer <[BLorimer@bakernewby.com](mailto:BLorimer@bakernewby.com)>; Melissa S. Taylor <[MTaylor@bakernewby.com](mailto:MTaylor@bakernewby.com)>  
**Subject:** RE: MCAP Financial Corporation v. Maskeen 177 Projects Ltd. et al. Vancouver Registry - S-260086

I am currently reviewing your materials and note that a Receivership Order was granted in March 2026, please provide me with same. I note that your service list for Country Green is incorrect.

**Adnan N. Habib**

Partner\* | Mediator  
 \* Practicing through Adnan N. Habib Law Corporation

em. [AHabib@bakernewby.com](mailto:AHabib@bakernewby.com)  
 ph. 1.604.852.3646  
 dir. 1.604.864.3803  
 fax. 1.604.852.5194  
 w. [bakernewby.com](http://bakernewby.com)  
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**From:** Churilov, Maya <[mchurilov@osler.com](mailto:mchurilov@osler.com)>  
**Sent:** Wednesday, May 6, 2026 11:28 AM  
**To:** Melissa S. Taylor <[MTaylor@bakernewby.com](mailto:MTaylor@bakernewby.com)>  
**Cc:** Newbery, Emma <[enewbery@osler.com](mailto:enewbery@osler.com)>; Ang, Pam <[pang@osler.com](mailto:pang@osler.com)>; Benjamin J. Lorimer <[BLorimer@bakernewby.com](mailto:BLorimer@bakernewby.com)>; Adnan N. Habib <[AHabib@bakernewby.com](mailto:AHabib@bakernewby.com)>  
**Subject:** RE: MCAP Financial Corporation v. Maskeen 177 Projects Ltd. et al. Vancouver Registry - S-260086

Hi Melissa,

Thank you for sending this over. Seeing that you did not take a position on the petition and granting of the receivership order, can you please confirm this means that Country Green is not taking a position on the sales process approval?

Benajmin, can you please confirm same for your client?

Thank you,  
 Maya

# OSLER

## Maya Churilov

Associate

604-692-2751 | [mchurilov@osler.com](mailto:mchurilov@osler.com)

Osler, Hoskin & Harcourt LLP | [osler.com](http://osler.com)

**From:** Melissa S. Taylor <[MTaylor@bakernewby.com](mailto:MTaylor@bakernewby.com)>

**Sent:** Wednesday, May 06, 2026 11:23 AM

**To:** Churilov, Maya <[mchurilov@osler.com](mailto:mchurilov@osler.com)>

**Cc:** Newbery, Emma <[enewbery@osler.com](mailto:enewbery@osler.com)>; Ang, Pam <[pang@osler.com](mailto:pang@osler.com)>; Benjamin J. Lorimer <[BLorimer@bakernewby.com](mailto:BLorimer@bakernewby.com)>; Adnan N. Habib <[AHabib@bakernewby.com](mailto:AHabib@bakernewby.com)>

**Subject:** RE: MCAP Financial Corporation v. Maskeen 177 Projects Ltd. et al. Vancouver Registry - S-260086

Good morning,

Further to Mr. Habib's email below, please find attached a copy of the Response to Petition filed on behalf of our client, Country Green Excavating Limited.

Yours truly,

## Melissa S. Taylor

Legal Assistant to Adnan N. Habib

em. [MTaylor@bakernewby.com](mailto:MTaylor@bakernewby.com)

ph. 1.604.852.3646

fax. 1.604.852.5194

w. [bakernewby.com](http://bakernewby.com)

200 – 2955 Gladwin Rd, Abbotsford BC V2T 5T4



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**Sent:** Wednesday, May 06, 2026 11:11 AM

**To:** Churilov, Maya <[mchurilov@osler.com](mailto:mchurilov@osler.com)>

**Cc:** Newbery, Emma <[enewbery@osler.com](mailto:enewbery@osler.com)>; Ang, Pam <[pang@osler.com](mailto:pang@osler.com)>; Melissa S. Taylor <[MTaylor@bakernewby.com](mailto:MTaylor@bakernewby.com)>; Benjamin J. Lorimer <[BLorimer@bakernewby.com](mailto:BLorimer@bakernewby.com)>

**Subject:** RE: MCAP Financial Corporation v. Maskeen 177 Projects Ltd. et al. Vancouver Registry - S-260086

Morning,

As per my discussion with Pam, my office will send over my client's Response to Petition which was filed in January, 2026.

**Adnan N. Habib**

Partner\* | Mediator

\* Practicing through Adnan N. Habib Law Corporation

**From:** Churilov, Maya <[mchurilov@osler.com](mailto:mchurilov@osler.com)>**Sent:** Wednesday, May 6, 2026 11:05 AM**To:** Adnan N. Habib <[AHabib@bakernewby.com](mailto:AHabib@bakernewby.com)>; Benjamin J. Lorimer <[BLorimer@bakernewby.com](mailto:BLorimer@bakernewby.com)>**Cc:** Newbery, Emma <[enewbery@osler.com](mailto:enewbery@osler.com)>; Ang, Pam <[pang@osler.com](mailto:pang@osler.com)>**Subject:** MCAP Financial Corporation v. Maskeen 177 Projects Ltd. et al. Vancouver Registry - S-260086**Importance:** High

Hi Adnan and Benjamin,

We understand Adnan represents Country Green and Benjamin represents Yard at a Time. We had Benjamin's demand for notice and have added you both to the service list for your respective parties. We were in front of Justice Walker this morning seeking a sales process order. Attached are our materials.

Justice Walker has requested the position of each Builders Lien holder on this application. We are back in front of Justice Walker at 2pm. Could please advise of your parties' position.

Thank you!

Maya

**OSLER****Maya Churilov**

Associate

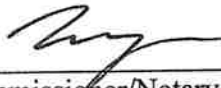
604-692-2751 | [mchurilov@osler.com](mailto:mchurilov@osler.com)Osler, Hoskin & Harcourt LLP | [osler.com](http://osler.com)

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Toronto | Montreal | Calgary | Ottawa | Vancouver | New York | [Contact Us](#)

LEAP Email Reference [F:e234c1c0-1461-4d6d-bd90-c3db21dea951|M:0d9b1778-ed9b-4400-92d9-c829ee98d6c5|O:34a2a9e2-bef1-4211-bc3f-81a8ec2b6c78]  
(Please do not delete)

This is Exhibit "B" referred to in the  
Affidavit #1 of Pamela Ang sworn before  
me at Vancouver, BC,  
this 6th day of May 2026



---

A Commissioner/Notary Public for the  
Province of British Columbia

**Churilov, Maya**

**From:** Benjamin J. Lorimer <BLorimer@bakernewby.com>  
**Sent:** Wednesday, May 06, 2026 11:46 AM  
**To:** Churilov, Maya; Melissa S. Taylor  
**Cc:** Newbery, Emma; Ang, Pam; Adnan N. Habib  
**Subject:** RE: MCAP Financial Corporation v. Maskeen 177 Projects Ltd. et al. Vancouver Registry - S-260086

Good Morning,

YAAT is not taking a position on the sales approval process.

Regards,

Ben L.

**Benjamin J. Lorimer**

Partner\*

\* Practicing through Benjamin J. Lorimer  
 Law Corporation

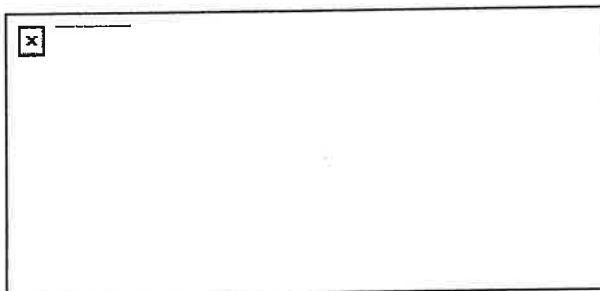
em. [BLorimer@bakernewby.com](mailto:BLorimer@bakernewby.com)

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**To:** Melissa S. Taylor <MTaylor@bakernewby.com>

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# OSLER

**Maya Churilov**

Associate

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**Subject:** RE: MCAP Financial Corporation v. Maskeen 177 Projects Ltd. et al. Vancouver Registry - S-260086

Good morning,

Further to Mr. Habib's email below, please find attached a copy of the Response to Petition filed on behalf of our client, Country Green Excavating Limited.

Yours truly,

## Melissa S. Taylor

Legal Assistant to Adnan N. Habib

em. [MTaylor@bakernewby.com](mailto:MTaylor@bakernewby.com)

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**Subject:** RE: MCAP Financial Corporation v. Maskeen 177 Projects Ltd. et al. Vancouver Registry - S-260086

Morning,

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**Adnan N. Habib**

Partner\* | Mediator

\* Practicing through Adnan N. Habib Law Corporation

**From:** Churilov, Maya <[mchurilov@osler.com](mailto:mchurilov@osler.com)>**Sent:** Wednesday, May 6, 2026 11:05 AM**To:** Adnan N. Habib <[AHabib@bakernewby.com](mailto:AHabib@bakernewby.com)>; Benjamin J. Lorimer <[BLorimer@bakernewby.com](mailto:BLorimer@bakernewby.com)>**Cc:** Newbery, Emma <[enewbery@osler.com](mailto:enewbery@osler.com)>; Ang, Pam <[pang@osler.com](mailto:pang@osler.com)>**Subject:** MCAP Financial Corporation v. Maskeen 177 Projects Ltd. et al. Vancouver Registry - S-260086**Importance:** High

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Justice Walker has requested the position of each Builders Lien holder on this application. We are back in front of Justice Walker at 2pm. Could please advise of your parties' position.

Thank you!

Maya

**OSLER****Maya Churilov**

Associate

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Toronto | Montreal | Calgary | Ottawa | Vancouver | New York | [Contact Us](#)

LEAP Email Reference [F:e234c1c0-1461-4d6d-bd90-c3db21dea951|M:0d9b1778-ed9b-4400-92d9-c829ee98d6c5|O:34a2a9e2-bef1-4211-bc3f-81a8ec2b6c78]  
(Please do not delete)

This is Exhibit "C" referred to in the  
Affidavit #1 of Pamela Ang sworn before  
me at Vancouver, BC,  
this 6th day of May 2026



---

A Commissioner/Notary Public for the  
Province of British Columbia

**Churilov, Maya**

---

**From:** Manoj Nair <Manoj@nexgenenv.com>  
**Sent:** Wednesday, May 06, 2026 12:51 PM  
**To:** Churilov, Maya  
**Cc:** Newbery, Emma; Ang, Pam; Herman Grewal  
**Subject:** RE: MCAP Financial Corporation v. Maskeen 177 Projects Ltd. et al. Vancouver Registry - S-260086

Thank you for the clarification.

Yes, we are ok with the below.  
Please proceed.

Sincere regards,

Manoj S. Nair

**NexGen Environmental Services LTD.**

74 Glacier Street, Coquitlam, BC V3K 5Y9

P: (604) 372 1323 Extn: 104

E: [manoj@nexgenenv.com](mailto:manoj@nexgenenv.com)

<http://www.nexgenenv.com>

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---

**From:** Churilov, Maya <mchurilov@osler.com>  
**Sent:** Wednesday, May 6, 2026 12:43 PM  
**To:** Manoj Nair <Manoj@nexgenenv.com>  
**Cc:** Newbery, Emma <newbery@osler.com>; Ang, Pam <pang@osler.com>; Herman Grewal <herman@nexgenenv.com>  
**Subject:** RE: MCAP Financial Corporation v. Maskeen 177 Projects Ltd. et al. Vancouver Registry - S-260086

Hi Manoj,

The current step being taken by the receiver is to obtain court approval to engage in a sale process to sell the lots and hire a real estate agent.

At this stage, we ask that you provide your position on the Receiver's application for approval of the sales process – meaning that you confirm you are not opposing the Receiver's application so that the Receiver can start the process to sell the lands. Distribution of any proceeds will be determined at a later date.

Thank you,  
Maya

**OSLER**

**Maya Churilov**  
Associate  
604-692-2751 | [mchurilov@osler.com](mailto:mchurilov@osler.com)  
Osler, Hoskin & Harcourt LLP | [osler.com](http://osler.com)

---

**From:** Manoj Nair <[Manoj@nexgenenv.com](mailto:Manoj@nexgenenv.com)>  
**Sent:** Wednesday, May 06, 2026 12:31 PM  
**To:** Churilov, Maya <[mchurilov@osler.com](mailto:mchurilov@osler.com)>  
**Cc:** Newbery, Emma <[enewbery@osler.com](mailto:enewbery@osler.com)>; Ang, Pam <[pang@osler.com](mailto:pang@osler.com)>; Herman Grewal <[herman@nexgenenv.com](mailto:herman@nexgenenv.com)>  
**Subject:** RE: MCAP Financial Corporation v. Maskeen 177 Projects Ltd. et al. Vancouver Registry - S-260086

Hi Maya

Please can u clarify what you need from us.

Our position is we need the outstanding invoice amounts till March 2026 paid.

Below are the outstanding invoice details as of March 2026 (before KSV took over).

Date	Transaction type	#	Customer full name	Due date
▼ 91 or more days past due (8)				
2025-06-25	Invoice	24-097-10	Maskeen	2025-06-25
2025-07-25	Invoice	24-097-11	Maskeen	2025-07-25
2025-08-25	Invoice	24-097-12	Maskeen	2025-08-25
2025-09-25	Invoice	24-097-13	Maskeen	2025-09-25
2025-10-25	Invoice	24-097-14	Maskeen	2025-10-25
2025-11-25	Invoice	24-097-15	Maskeen	2025-11-25
2025-12-25	Invoice	24-097-16	Maskeen	2025-12-25
2026-01-25	Invoice	24-097-17	Maskeen	2026-01-25
Total for 91 or more days pa...				
▼ 61 - 90 days past due (1)				
2026-02-25	Invoice	24-097-18	Maskeen	2026-02-25
Total for 61 - 90 days past due				
▼ 31 - 60 days past due (1)				
2026-03-25	Invoice	24-097-19	Maskeen	2026-03-25
Total for 31 - 60 days past due				
<b>TOTAL</b>				

Please let me know if this is what you need. Also, please add me to the email list.

Thank you.

Sincere regards

Manoj S. Nair

---

**From:** Churilov, Maya <mchurilov@osler.com>

**Sent:** Wednesday, May 6, 2026 11:33 AM

**To:** Accounts Payable <ap@nexgenenv.com>

**Cc:** Newbery, Emma <enewbery@osler.com>; Ang, Pam <pang@osler.com>

**Subject:** MCAP Financial Corporation v. Maskeen 177 Projects Ltd. et al. Vancouver Registry - S-260086

Hello,

We understand that you spoke with Pam from our office this morning regarding the sales process approval in the above-noted matter. We were in front of Justice Walker this morning seeking a sales process order. Attached are our materials.

Justice Walker has requested the position of each Builders Lien holder on this application. We are back in front of Justice Walker at 2pm. Could please advise of your position.

Please note we have added your contact information to the service list.

Best,  
Maya

# OSLER

**Maya Churilov**

Associate

604-692-2751 | [mchurilov@osler.com](mailto:mchurilov@osler.com)

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This is Exhibit "D" referred to in the  
Affidavit #1 of Pamela Ang sworn before  
me at Vancouver, BC,  
this 6th day of May 2026



---

A Commissioner/Notary Public for the  
Province of British Columbia

**From:** [Dave K.](#)  
**To:** [Churilov, Maya](#)  
**Cc:** [Newbery, Emma](#); [Ang, Pam](#)  
**Subject:** Re: MCAP Financial Corporation v. Maskeen 177 Projects Ltd. et al. Vancouver Registry - S-260086  
**Date:** Wednesday, May 06, 2026 1:08:17 PM

---

Hello Maya, thank you for your email. I confirm that my client, Northcoast, takes no position on the sale process application. Also thank you for adding me to the service list, good luck in court.

Yours truly,

David M. Kamachi

Kamachi Law Group  
tel. [604.813.6493](tel:604.813.6493)  
email [dmk@kamachilaw.com](mailto:dmk@kamachilaw.com)

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On May 6, 2026, at 11:29 AM, Churilov, Maya <[mchurilov@osler.com](mailto:mchurilov@osler.com)> wrote:

Hi Dave,

We understand that you represent North Coast Building Products Ltd. We were in front of Justice Walker this morning seeking a sales process order. Attached are our materials.

Justice Walker has requested the position of each Builders Lien holder on this application. We are back in front of Justice Walker at 2pm. Could please advise of your parties' position.

Please note we have added your contact information to the service list.

Best,  
Maya

<image001.gif>

**Maya Churilov**

Associate

604-692-2751 | [mchurilov@osler.com](mailto:mchurilov@osler.com)

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