



NO. S-2311065
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

PEAKHILL CAPITAL INC.

PETITIONER

AND:

SOUTHVIEW GARDENS LIMITED PARTNERSHIP, SOUTHVIEW GARDENS BT LTD.,
SOUTHVIEW GARDENS PROPERTIES LTD., ZHEN YU ZHONG, JUNCHAO MO,
COROMANDEL PROPERTIES (2016) LTD., BAYSTONE PROPERTIES (2016) LTD., and
CORO MANDEL HOLDINGS LTD.

RESPONDENTS

APPLICATION RESPONSE

Application response of: CENYARD DEVELOPMENTS INC. (the "Application Respondent")

THIS IS A RESPONSE TO the Notice of Application of KVS Restructuring Inc. ("**KVS**"), in its capacity as the Court-appointed receiver manager (in such capacity, the "**Receiver**") filed June 30, 2023.

Part 1: ORDER CONSENTED TO

The Application Respondent consents to the granting of the orders set out in paragraph 1(a) and 1(b) of Part 1 of the Receiver's Notice of Application.

Part 2: ORDERS OPPOSED

The Application Respondent does not oppose any of the orders set out in the Receiver's Notice of Application.

Part 3: ORDERS ON WHICH NO POSITION IS TAKEN

The Application Respondent takes no position on the granting of the orders set out in paragraphs 2, 3, and 4 of Part 1 of the Receiver's Notice of Application.

Part 4: FACTUAL BASIS

1. The Application Respondent relies on the facts as set out in its written submissions, to be included in the Application Record in connection with the Receiver's Notice of Application.

Part 5: LEGAL BASIS

1. The Application Respondent is supportive of the orders sought by the Receiver in paragraph 1(a) and 1(b) of Part 1 of the Receiver's Notice of Application based on the legal basis as set out in the Application Respondent's written submissions, to be included in the application record.


Part 6: MATERIAL TO BE RELIED ON

1. Affidavit #1 of David Venance, to be filed.
2. Second Report of the Receiver dated June 29, 2023.

The application respondent estimate that the application will take 1 day.

- The application respondent has filed in this proceeding a document that contains the application respondent's address for service.

Date: July 20, 2023


Signature of Emma Newbery
and Jordan Schultz
Lawyer for application respondent