



This is the 2nd affidavit of
Faye Villalon in this case
and was made on August 2, 2023

No. S235348
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

MCEOWN AND ASSOCIATES LTD. in its capacity as
RECEIVER OF 8655 GRANVILLE LIMITED PARTNERSHIP

Petitioner

AND:

RED BUFFALO 8655 HOLDINGS LTD.

Respondents

AFFIDAVIT

I, Faye Villalon, legal administrative assistant, of Watson Goepel LLP, 1200-1075 W Georgia Street, Vancouver, British Columbia, MAKE OATH AND SAY THAT:

1. I am a legal administrative assistant at Watson Goepel LLP, counsel for the petitioner in these proceedings, and as such have personal knowledge of the facts and matters deposed to in this Affidavit, save and except where they are said to be based on information and belief, in which case I believe them to be true.
2. Attached and marked as **Exhibit "A"** is a service letter dated July 28, 2023, which was sent by our office to all parties by the methods indicated in the letter, together with copies of the petition materials referenced therein.
3. Attached and marked as **Exhibit "B"** is a service email sent by our office to counsel for 114506 B.C. Ltd., Sunshine Treasurehunt Development Ltd., and Canadian Western Bank dated July 28, 2023, together with an email from counsel for Canadian Western Bank confirming that CWB does not oppose the relief sought.
4. Attached and marked as **Exhibit "C"** is a courier delivery confirmation, which confirms service of our office's service letter dated July 28, 2023, and the petition

materials on the registered and records address for Red Buffalo 8655 Holdings Ltd. on July 28, 2023.

5. Attached and marked as **Exhibit "D"** is a service letter to all parties dated July 31, 2023, which was sent by our office to all parties by the methods indicated in the letter, together with copies of the Order and Notice of Hearing referenced therein.
6. Attached and marked as **"Exhibit "E"** is a service email to counsel for 114506 B.C. Ltd., Sunshine Treasurehunt Development Ltd., and Canadian Western Bank dated July 31, 2023.
7. Attached and marked as **Exhibit "F"** is a courier delivery confirmation, which confirms service of our office's service letter dated July 31, 2023, together with a copy of the Order and Notice of Hearing referenced therein, on the registered and records address for Red Buffalo 8655 Holdings Ltd on July 31, 2023.

SWORN
BEFORE ME at Vancouver,
British Columbia,
on August 2, 2023

A Commissioner for taking
Affidavits for British Columbia

)
)
)
)
) 

) FAYE VILLALON
)
)
)

THOMAS MARK HANSON
Barrister & Solicitor
WATSON GOEPEL LLP
1200 - 1075 W. Georgia Street
Vancouver, B.C. V6E 3C9
Tel: 604-688-1301 Fax: 604-688-8193

This is Exhibit "A" referred to in the
 Affidavit of Faye Villalon
 sworn (or affirmed) before me at
Vancouver, B.C.
 this 2 day of August, 2023.

Jeremy D. West
 Direct: 604-642-5684
 jwest@watsongoepel.com

**A Commissioner for Taking Affidavits
 within British Columbia**

Legal Assistant: Chelsey Cochrane
 Direct: 604-642-5695
 ccochrane@watsongoepel.com

July 28, 2023

File No. 231891-0008

By courier

By email: rclark@bridgehouselaw.ca

Red Buffalo 8655 Holdings Ltd.
 7985 Granville Street
 Vancouver, BC
 V6P 4Z3

114506 B.C. Ltd
 c/o Bridgehouse Law LLP
 9th Floor, 900 West Hastings St.
 Vancouver, BC
 V6C 1E5

Attn: Ritchie Clark, KC

By email: dpalow@kornfeldllp.com

By email: dnugent@rbs.ca

Sunshine Treasurehunt Development Ltd.
 c/o Kornfeld LLP
 1100 One Bentall Centre
 505 Burrard Street, Box 11
 Vancouver, BC
 V7X 1M5

Canadian Western Bank
 c/o Richards Buell Sutton LLP
 700 - 401 West Georgia St.
 Vancouver, BC
 V6B 5A1

Attn: Daniel D. Nugent

Attn: Dan Parlow

Dear Sirs/Mesdames:

**Re: McEown and Associates Ltd. in its capacity as Receiver of 8655 Granville Limited Partnership v. Red Buffalo 8655 Holdings Ltd.
 SCBC action no. S-235348, Vancouver Registry**

We are counsel for McEown and Associates Ltd., in its capacity as receiver of 8655 Granville Limited Partnership ("McEown").

We write further to our recent correspondence regarding McEown's application to be appointed as receiver of Red Buffalo 8655 Holdings Ltd.

Service of Petition Materials

Please find enclosed for service upon you:

1. Petition to the Court dated July 27, 2023;
2. Affidavit #1 of John McEown made July 27, 2023; and
3. Affidavit #1 of Faye Villalon made July 27, 2023.

We confirm your previous advice that you are instructed to accept service of the petition materials on behalf of each of your respective clients.

Hearing of the Petition

We also confirm your previous advice that your respective clients do not oppose the appointment of McEown as receiver. We intend to seek short leave on Monday, July 31, 2023, for orders that the petition be returnable on Thursday, August 3, 2023.


We intend to advise the Court on Monday that we have received confirmation there will be no opposition from your respective clients.

Please confirm receipt of this correspondence and the referenced documents.

Yours truly,

WATSON GOEPEL LLP

per:

for


Jeremy D. West*

*Law Corporation

JDW:tmh

Encl:

1. Petition to the Court dated July 27, 2023;
2. Affidavit #1 of John McEown made July 27, 2023; and
3. Affidavit #1 of Faye Villalon made July 27, 2023.

From: [Dan Nugent](#)
To: [West, Jeremy](#)
Cc: [Tommy M. Chan](#); [Cochrane, Chelsey](#); [Hanson, Thomas](#); [Diana Manuel](#)
Subject: Re: McEown and Associates Ltd. in its capacity as Receiver of 8655 Granville Limited Partnership v. Red Buffalo 8655 Holdings Ltd.; SCBC action no. S-235348, Vancouver Registry [RBS-active.FID1764548]
Date: July 28, 2023 12:25:45 PM

Thanks Jeremy,
Tommy,
I've reviewed the updated
form of order and have no issues with same.
CWB does not oppose the relief sight
In the NOA.
Thanks
Dan
Sent from my iPhone

This is Exhibit "B" referred to in the
Affidavit of Faye Villalob
sworn (or affirmed) before me at
Vancouver, B.C.
this 2 day of August, 2023.

A Commissioner for Taking Affidavits
within British Columbia



Daniel D. Nugent
Partner*

DIRECT: 604.595.9917 EMAIL: dnugent@rbs.ca
*LAW CORPORATION

On Jul 28, 2023, at 11:48 AM, West, Jeremy <jwest@watsongoepel.com> wrote:

Thanks Tommy.

We had previously sent the proposed order to DAN for comment and revised in accordance with CWB's comments.

If possible, it would be helpful if you could confirm to us that the CWB does not oppose (if that is, in fact, your instructions) so that we can advise the court.

Regards

Jeremy

Sent from my iPhone

Jeremy D. West

Partner, Watson Goepel LLP

[604 642 5684](tel:6046425684) (Direct)

[604 688 1301](tel:6046881301) (Office) | [604 688 8193](tel:6046888193) (Fax) | jwest@watsongoepel.com

[1200 – 1075 West Georgia St. Vancouver, BC V6E 3C9](#)

On Jul 28, 2023, at 11:28 AM, Tommy M. Chan <TChan@rbs.ca> wrote:

Thanks Chelsey,

Receipt acknowledged.

Tommy M. Chan, 陳文聚
Partner

DIRECT: 604.909.9331 EMAIL: tchan@rbs.ca

ASSISTANT: Ivana Barnes TEL: 604.661.9204 EMAIL: ibarnes@rbs.ca



RICHARDS BUELL SUTTON LLP

700 - 401 West Georgia Street, Vancouver, BC, Canada V6B 5A1 | TEL: 604.682.3664 | FAX:
 604.688.3830 | RBS.CA

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From: Cochrane, Chelsey <ccochrane@watsongoepel.com>

Sent: July 28, 2023 11:26 AM

To: Tommy M. Chan <TChan@rbs.ca>

Cc: Hanson, Thomas <thanson@watsongoepel.com>; West, Jeremy
 <jwest@watsongoepel.com>

Subject: FW: McEown and Associates Ltd. in its capacity as Receiver of 8655
 Granville Limited Partnership v. Red Buffalo 8655 Holdings Ltd.; SCBC action no.
 S-235348, Vancouver Registry

Good morning Tommy,

I understand that Dan is away until August 7th, please see the attached just sent
 this morning and confirm receipt.

Best regards,

Chelsey Cochrane, Legal Administrative Assistant

D 604 642 5695 | **F** 604 688 8193

E ccochrane@watsongoepel.com

Vancouver | West Vancouver | Surrey

From: Cochrane, Chelsey

Sent: July 28, 2023 11:20 AM

To: rclark@bridgehouselaw.ca; Dan Parlow <dparlow@kornfeldllp.com>;
 'dnugent@rbs.ca' <dnugent@rbs.ca>

Cc: West, Jeremy <jwest@watsongoepel.com>; Hanson, Thomas
 <thanson@watsongoepel.com>

Subject: McEown and Associates Ltd. in its capacity as Receiver of 8655
 Granville Limited Partnership v. Red Buffalo 8655 Holdings Ltd.; SCBC action no.
 S-235348, Vancouver Registry

Good morning All,

Please see the attached correspondence and pleadings sent on behalf of Mr.

West.

Best regards,

<image001.png>

<image002.jpg>

Chelsey Cochrane, Legal Administrative Assistant

D 604 642 5695 | F 604 688 8193

E ccochrane@watsongoepel.com

1200-1075 West Georgia St., Vancouver, BC V6E 3C9

Vancouver | West Vancouver | Surrey

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From: 4840448.00
To: Villalon, Faye; Cochrane, Chelsey
Subject: Corporate Couriers Logistics Delivery Notification for Order 4840448.00
Date: July 28, 2023 12:51:29 PM

Order 4840448.00 was delivered at 07/28/23 12:50 PM.
Signed for by: Denika

Track future orders online at <https://protect-eu.mimecast.com/s/sxYjCR1kBUJmOKt9S0Ff>

Order placed by: WGVancouver

Origin

Watson Goepel
1075 W Georgia St
1200
Vancouver BC V6E

Destination

Red Buffalo 8655 Holdings Ltd.
7985 Granville Street

Vancouver BC V6P

Details

Pieces: 0
Weight: 0
Reference1: 231891-0008
Reference2:
Ready for pickup: 07/28/23 11:41 AM
Due: 07/28/23 1:18 PM

Delivered at: 07/28/23 12:50 PM
Signed by: Denika

Terms & Conditions

Your order is subject to our terms and conditions of carriage,
including limits of liability.
For a copy please visit <https://protect-eu.mimecast.com/s/fxO6CVOoZi7wZ4UznnLi>

This is Exhibit " C " referred to in the
Affidavit of Faye Villalon
sworn (or affirmed) before me at
Vancouver, B.C.
this 2 day of August 2023

A Commissioner for Taking Affidavits
within British Columbia

Jeremy D. West
Direct: 604-642-5684
jwest@watsongoepel.com

This is Exhibit "D" referred to in the
Affidavit of Faye Villalon
sworn (or affirmed) before me at
Vancouver, B.C.
this 7 day of August, 2023.

Legal Assistant: Chelsey Cochrane
Direct: 604-642-5695
ccochrane@watsongoepel.com

July 31, 2023

File No. 231891-0008

By courier

**A Commissioner for Taking Affidavits
within British Columbia**

By email: rclark@bridgeouselaw.ca

Red Buffalo 8655 Holdings Ltd.
7985 Granville Street
Vancouver, BC
V6P 4Z3

114506 B.C. Ltd
c/o Bridgehouse Law LLP
9th Floor, 900 West Hastings St.
Vancouver, BC
V6C 1E5

Attn: Ritchie Clark, KC

By email: dparlow@kornfeldllp.com

By email: dnugent@rbs.ca

Sunshine Treasurehunt Development Ltd.
c/o Kornfeld LLP
1100 One Bentall Centre
505 Burrard Street, Box 11
Vancouver, BC
V7X 1M5

Canadian Western Bank
c/o Richards Buell Sutton LLP
700 - 401 West Georgia St.
Vancouver, BC
V6B 5A1

Attn: Daniel D. Nugent

Attn: Dan Parlow

Dear Sirs/Mesdames:

**Re: McEown and Associates Ltd. in its capacity as Receiver of 8655 Granville Limited Partnership v. Red Buffalo 8655 Holdings Ltd.
SCBC action no. S-235348, Vancouver Registry**

We are counsel for McEown and Associates Ltd., in its capacity as receiver of 8655 Granville Limited Partnership ("McEown").

We write further to our letter dated July 27, 2023. McEown's application for an order that the petition be heard on short notice on August 3rd, 2023, was granted today.

Please find enclosed for service upon you:

1. Short Notice Order made by Master Hughes on July 31, 2023; and
2. Notice of Hearing of the Petition dated July 31, 2023.

Please note that any responsive materials must be served by tomorrow, August 1, 2023, at 4:00 p.m. Our office will be preparing and filing an application record before noon on August 2, 2023.

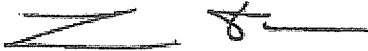
Please confirm receipt of this correspondence and the referenced documents.

Yours truly,

WATSON GOEPEL LLP

per:

for

Handwritten signature of Jeremy D. West, consisting of a stylized 'J' and 'W' followed by a horizontal line.

Jeremy D. West*

*Law Corporation

JDW:tmh

Encl:

1. Short Notice Order made by Master Hughes on July 31, 2023; and
2. Notice of Hearing of the Petition dated July 31, 2023.

From: Cochrane, Chelsey
To: rclark@bridgehouselaw.ca; Dan Parlow; "dnugent@rbs.ca"; Tommy M. Chan
Cc: West, Jeremy; Hanson, Thomas; Diana Manuel
Subject: RE: McEown and Associates Ltd. in its capacity as Receiver of 8655 Granville Limited Partnership v. Red Buffalo 8655 Holdings Ltd.; SCBC action no. S-235348, Vancouver Registry
Date: July 31, 2023 2:15:00 PM
Attachments: LT all parties serving short notice order and notice of hearing (01689476xB8FE6).PDF
 image001.png
 image002.jpg
 Notice of Hearing of Petition (01689453xB8FE6).PDF
 Short Notice Order (01689450xB8FE6).PDF

Good afternoon All,

Please see the attached send on behalf of Mr. West.

Best regards,

Chelsey Cochrane, Legal Administrative Assistant
 D 604 642 5695 | F 604 688 8193
 E ccochrane@watsongoepel.com

Vancouver | West Vancouver | Surrey

This is Exhibit "E" referred to in the
 Affidavit of Faye Killaton
 sworn (or affirmed) before me at
Vancouver, B.C.
 this 7 day of August, 2023.

**A Commissioner for Taking Affidavits
 within British Columbia**

From: Cochrane, Chelsey

Sent: July 28, 2023 11:20 AM

To: rclark@bridgehouselaw.ca; Dan Parlow <dparlow@kornfeldllp.com>; 'dnugent@rbs.ca'
 <dnugent@rbs.ca>

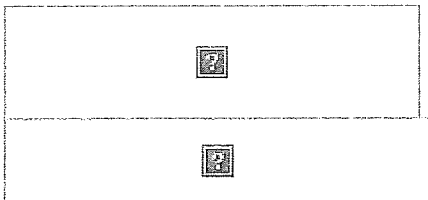
Cc: West, Jeremy <jwest@watsongoepel.com>; Hanson, Thomas <thanson@watsongoepel.com>

Subject: McEown and Associates Ltd. in its capacity as Receiver of 8655 Granville Limited Partnership v. Red Buffalo 8655 Holdings Ltd.; SCBC action no. S-235348, Vancouver Registry

Good morning All,

Please see the attached correspondence and pleadings sent on behalf of Mr. West.

Best regards,



Chelsey Cochrane, Legal Administrative Assistant

D 604 642 5695 | F 604 688 8193
 E ccochrane@watsongoepel.com
 1200-1075 West Georgia St., Vancouver, BC V6E 3C9
 Vancouver | West Vancouver | Surrey

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WG Vancouver
1187 - Watson Goe...

- What's New
- Place Order
- Track Order
- Reports
- Parcel Tracking
- Address Book
- Order Templates
- Invoices
- User Profile
- Logout

Collapse

Tracking Info: 4844210

7985 Granville St
7985 Granville St
Vancouver, BC V6P 4Z3
Attn Red Buffalo 8655 Holdings Ltd.

Destination

Status: DELIVERED

Billing Group/Cost Center: Downtown Vancouver

Order Type: P1

Charges: \$38.01

Ordered By: WGVancouver

Pickup Ready: 2023-07-31 1:56 PM PDT

Deliver By: 2023-07-31 3:33 PM PDT

Pieces / Weight: 0 / 0

Package Info: Generic

Reference: 231891-0008

Dispatched: 2023-07-31 2:03 PM PDT

Confirmed by Driver: 2023-07-31 2:11 PM PDT

At Pickup: 2023-07-31 2:25 PM PDT

At Delivery: 2023-07-31 3:30 PM PDT

Ordered 2023-07-31 1:56 PM PDT	Picked Up 2023-07-31 2:25 PM PDT	Delivered 2023-07-31 3:30 PM PDT
---	---	---

No parcels

Proof of Delivery:

POD: Danica

Close

third party carriers. Extra ch... Close

ie number for each order. Thi... Close

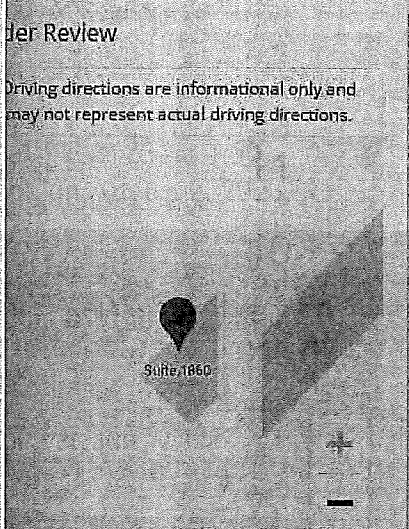
marks as today is Month end... Close

Close

package, we do not get signatu... Close

Order Review

Driving directions are informational only and may not represent actual driving directions.



50th St, 1860

Map Data Terms of Use Report a map error

Add to Cart Place Order

This is Exhibit "F" referred to in the Affidavit of Enrique Villalob sworn (or affirmed) before me at Vancouver, B.C. this 2 day of August, 2023.

A Commissioner for Taking Affidavits within British Columbia