



Affidavit #1 of Wen-Shih Yang
Made on February 25, 2026

NO. S-261320
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

ROYAL BANK OF CANADA

PLAINTIFF

AND:

WESTCOAST APPLIANCE CENTRE 2014 LTD.
CAPITAL IRON (2022) LTD.
ARAM HOLDINGS LTD.
TAHAMTAN ARAM ALSO KNOWN AS FRED ARAM

DEFENDANTS

AFFIDAVIT

I, WEN-SHIH YANG, of 20th Floor, 250 Howe Street, Vancouver, British Columbia, Paralegal, AFFIRM THAT:


1. I am a Paralegal employed by the law firm of Dentons Canada LLP, solicitors for the Plaintiff, and as such have personal knowledge of the matters and facts herein deposed to except where stated to be on information and belief and where so stated do verily believe the same to be true.
2. Attached hereto and marked together as **Exhibit "A"** are copies of an email correspondences between John Heaney, previous counsel for the Defendants and Dentons Canada LLP.
3. Attached hereto and marked together as **Exhibit "B"** are copies of the email correspondence sent to Mr. Aram and the automatic responses received in response.
4. Attached hereto and marked as **Exhibit "C"** is a copy of a letter sent by courier to the Defendants on February 25, 2026.

5. Attached hereto and marked together as **Exhibit "D"** are copies of correspondence sent to Wells Fargo Capital Finance Corporation Canada on February 20 and 24, 2026.
6. Attached hereto and marked as **Exhibit "E"** is a copy of an email correspondence sent to Adam Barker and Ronnell Francisco at Business Development Bank of Canada on February 25, 2026.
7. Attached hereto and marked as **Exhibit "F"** is a copy of an email correspondence with His Majesty the King in Right of Canada c/o Department of Justice on February 25, 2026.
8. Attached hereto and marked together as **Exhibit "G"** are copies of letters sent via courier or priority mail dated February 23 and 24, 2026, along with their tracking information.

AFFIRMED BEFORE ME at Vancouver,
British Columbia, on February 25, 2026.



A Commissioner for taking Affidavits
in the Province of British Columbia.



WEN-SHIH YANG

CHLOE DUCLUZEAU
Barrister & Solicitor
DENTONS CANADA LLP
20th Floor, 250 Howe Street
Vancouver, B.C. V6C 3R8
Telephone (604) 687-4460

This is **Exhibit "A"** referred to in the affidavit of Wen-Shih Yang made before me at Vancouver, British Columbia on this the 25th day of February, 2026.



A Commissioner for taking Affidavits
for British Columbia

Yang, Dannis

From: John Heaney <jheaney@reedpope.ca>
Sent: Friday, February 20, 2026 4:32 PM
To: Dubo, Sherryl
Cc: Yang, Dannis; Ducluzeau, Chloe; Pamela Haliday
Subject: RE: RBC and Westcoast/Capital Iron [RP-LEGAL1.FID192973]

[WARNING: EXTERNAL SENDER]

Ms. Dubo

As we discussed on the phone, you may communicate to the Court from me that Mr. Aram is briefed on RBC's application and the Consent Order you sent us. The Debtors take no position on the receiver appointment application and Mr. Aram will not sign or instruct me to sign a Consent Order.

Kind regards

John

John S. Heaney

reed pope

Business Lawyers

202-1007 Fort Street
Victoria, British Columbia
Canada, V8V 3K5

Direct: 250-419-5089

Tel 250-383-3838 (x5089)

Cel 778-678-7081

Fax 250-385-4324

From: Dubo, Sherryl <sherryl.dubo@dentons.com>
Sent: Thursday, February 19, 2026 8:30 AM
To: John Heaney <jheaney@reedpope.ca>
Cc: Yang, Dannis <dannis.yang@dentons.com>; Ducluzeau, Chloe <chloe.ducluzeau@dentons.com>; Pamela Haliday <phaliday@reedpope.ca>
Subject: RE: RBC and Westcoast/Capital Iron [RP-LEGAL1.FID192973]

Good morning John,

I'm writing to let you know that the court registry has assigned Justice Veestra to hear the bank's application in Vancouver on Monday, Feb. 23rd at 9:00am. I had indicated in my email below that the hearing would be on Friday.

Regards,

Sherryl Dubo

Yang, Dannis

From: Yang, Dannis
Sent: Friday, February 20, 2026 6:05 PM
To: jheaney@reedpope.ca
Cc: Dubo, Sherry; Ducluzeau, Chloe
Subject: RBC and Westcoast/Capital Iron; SCBC Vancouver Registry S-261320
Attachments: 2026-02-20 Service LT Reed Pope.pdf; 2026-02-20 Affidavit #1 of T. Deretic (Body Only).pdf; 2026-02-20 Notice of Application (Receivership).pdf; 2026-02-20 Notice of Civil Claim - judgment and receivership.pdf

Good evening Mr. Heaney,

Please find enclosed a correspondence from Ms. Dubo and enclosures. Kindly confirm receipt of this email.

Regards,

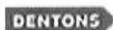
Dannis Yang
Paralegal

My pronouns are: She/Her/Hers

+1 604 639 4174

dannis.yang@dentons.com | [Bio](#) | [Website](#)

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Yang, Dannis

From: John Heaney <jheaney@reedpope.ca>
Sent: Monday, February 23, 2026 9:07 AM
To: Dubo, Sherryl
Cc: Pamela Haliday; Watson, Eamonn; Ducluzeau, Chloe; Yang, Dannis; Bowra, Chris
Subject: Re: RBC and Westcoast/Capital Iron - business closed

[WARNING: EXTERNAL SENDER]

Good morning, Sherryl

We no longer act for Mr. Aram in this matter nor any of the borrowers or guarantors.

Our contact information for him is what we assume is generally available to those who have spoken to or written him.

Kind regards

John

John S. Heaney

reed pope

Business Lawyers

202-1007 Fort Street
 Victoria, British Columbia
 Canada, V8V 3K5

Direct: 250-419-5089

Tel 250-383-3838 (x5089)

Cel 778-678-7081

Fax 250-385-4324

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From: Dubo, Sherryl <sherryl.dubo@dentons.com>
Sent: Monday, February 23, 2026 8:42:39 AM
To: John Heaney <jheaney@reedpope.ca>
Cc: Pamela Haliday <phaliday@reedpope.ca>; Watson, Eamonn <eamonn.watson@dentons.com>; Ducluzeau, Chloe <chloe.ducluzeau@dentons.com>; Yang, Dannis <dannis.yang@dentons.com>; Bowra, Chris <cbowra@bdo.ca>
Subject: RBC and Westcoast/Capital Iron - business closed

Good morning John,

We've been advised by counsel for Cantrex that they anticipate requesting an adjournment of the bank's receivership application today, and Wells Fargo has contacted us this morning to advise they have not yet been able to retain counsel. This means that we may be delayed in getting the receivership order in place if Justice Veenstra grants an adjournment.

We understand Mr. Aram has indeed closed down the businesses, as you advised he would be doing as of Friday. RBC is of course concerned about what protective measures are in place to ensure the companies' assets are secured.

Could you please find out from your client what the status is at both premises? We are assuming the premises are locked and alarmed, but do not know who continues to have access. Could you please encourage Mr. Aram to contact Chris Bowra? I have copied Chris with this email.

Could you please also provide us with the contact information for the landlord of Westcoast's premises? Dan Nugent at Richards Buell Sutton has already contacted me on behalf of the Capital Iron premises landlord.

Thank you,

Sherryl Dubo
Counsel

My pronouns are: She/Her/Hers

+1 604 648 6534

sherryl.dubo@dentons.com | [Bio](#) | [Website](#)

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This lawyer practices through a law corporation.

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This is **Exhibit "B"** referred to in the affidavit of Wen-Shih Yang made before me at Vancouver, British Columbia on this the 25th day of February, 2026.

A handwritten signature in blue ink, consisting of stylized cursive letters, is written over a horizontal line. The signature appears to be 'Chih-Shih Yang'.

A Commissioner for taking Affidavits
for British Columbia

Yang, Dannis

From: Yang, Dannis
Sent: Wednesday, February 25, 2026 9:32 AM
To: fred@westcoastappliance.ca; fred@capitaliron.ca
Cc: Dubo, Sherry; Ducluzeau, Chloe
Subject: Royal Bank of Canada v. Westcoast Appliance Centre 2014 Ltd., et al.; SCBC Vancouver Registry S-261320
Attachments: 2026-02-23 _ Requisition - General (to adjourn application).pdf; 2026-02-23 _ Order Made After Application (Adjournment Order), granted February 23, 2026.pdf

Good morning Fred,

Please find attached the Order made on Monday, Feb. 23 by Justice Veenstra and a filed requisition resetting hearing to Friday, Feb. 27 at 9:00 a.m.

Regards,

Dannis Yang
Paralegal

My pronouns are: She/Her/Hers

+1 604 639 4174

dannis.yang@dentons.com | [Bio](#) | [Website](#)

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Yang, Dannis

From: Fred Aram <fred@westcoastappliance.ca>
Sent: Wednesday, February 25, 2026 9:32 AM
To: Yang, Dannis
Subject: Automatic reply: Royal Bank of Canada v. Westcoast Appliance Centre 2014 Ltd., et al.; SCBC Vancouver Registry S-261320

[WARNING: EXTERNAL SENDER]

Thank you for your message.

Please be advised that Westcoast Appliance Gallery and Capital Iron Home Store have ceased operations. Royal Bank of Canada has commenced enforcement proceedings, and a court-appointed receiver is expected to be appointed shortly.

I am no longer involved in the operations of the businesses, and this email account will not be monitored going forward.

Once appointed, the receiver will provide further information regarding the businesses and any related matters.

Thank you for your understanding.

Yang, Dannis

From: Fred Aram <Fred@capitaliron.ca>
Sent: Wednesday, February 25, 2026 9:32 AM
To: Yang, Dannis
Subject: Automatic reply: Royal Bank of Canada v. Westcoast Appliance Centre 2014 Ltd., et al.; SCBC Vancouver Registry S-261320

[WARNING: EXTERNAL SENDER]

Thank you for your message.

Please be advised that Westcoast Appliance Gallery and Capital Iron Home Store have ceased operations. Royal Bank of Canada has commenced enforcement proceedings, and a court-appointed receiver is expected to be appointed shortly.

I am no longer involved in the operations of the businesses, and this email account will not be monitored going forward.

Once appointed, the receiver will provide further information regarding the businesses and any related matters.

Thank you for your understanding.

This is **Exhibit "C"** referred to in the affidavit of Wen-Shih Yang made before me at Vancouver, British Columbia on this the 25th day of February, 2026.



A Commissioner for taking Affidavits
for British Columbia

February 25, 2026

File no. 314832-1005

VIA COURIER

Westcoast Appliance Centre 2014 Ltd.
c/o Registered Office
1 – 505 Fisgard Street
Victoria, BC V8V 1R3

Aram Holdings Ltd.
c/o Registered Office
1 – 505 Fisgard Street
Victoria, BC V8V 1R3

Capital Iron (2022) Ltd.
c/o Registered Office
1 – 505 Fisgard Street
Victoria, BC V8V 1R3

Tahamtan Aram aka Fred Aram
3250 Muirfield Place
Coquitlam, BC V3E 3K4

Tahamtan Aram aka Fred Aram
886 Lodi Ave
Victoria, BC V8Z 6R2

Dear Sir:

**Re: *Royal Bank of Canada v. Westcoast Appliance Centre 2014 Ltd., et al.*
Supreme Court of British Columbia, Vancouver Registry, Action No. S-261320**

We are the solicitors for Royal Bank of Canada ("RBC") in the above captioned court action.

Please find enclosed for service the following documents:

- Order of Justice Veenstra made on February 23, 2026; and
- Requisition resetting hearing to Friday, February 27, 2026 at 9:00 a.m.

Kindly confirm receipt by emailing the undersigned.

Best regards,
Dentons Canada LLP



Sherryl Dubo
Counsel

SD/dy
Enclosure

This is **Exhibit "D"** referred to in the affidavit of Wen-Shih Yang made before me at Vancouver, British Columbia on this the 25th day of February, 2026.

A handwritten signature in blue ink, appearing to be 'Ch. S. J.', written over a horizontal line.

A Commissioner for taking Affidavits
for British Columbia

Yang, Dannis

From: Yang, Dannis
Sent: Friday, February 20, 2026 6:09 PM
To: Finley, Crystal L.; Kanabar, Rick
Cc: Ducluzeau, Chloe; Dubo, Sherryl
Subject: Royal Bank of Canada v. Westcoast Appliance Centre 2014 Ltd., et al.; SCBC Vancouver Registry S-261320
Attachments: 2026-02-20 Service LT Wells Fargo Canada.pdf; 2026-02-20 Notice of Civil Claim - judgment and receivership.pdf; 2026-02-20 Notice of Application (Receivership).pdf; 2026-02-20 Affidavit #1 of T. Deretic (Body Only).pdf

Hi Crystal and Rick,

Please find enclosed a correspondence from Ms. Dubo and enclosures. Kindly confirm receipt of this email.

Regards,

Dannis Yang
Paralegal

My pronouns are: She/Her/Hers

+1 604 639 4174

dannis.yang@dentons.com | [Bio](#) | [Website](#)

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February 20, 2026

File no. 314832-1005

VIA EMAIL: rick.kanabar@wellsfargo.com

Wells Fargo Capital Finance Corporation Canada
1290 Central Pky W, Suite 1000
Mississauga, Ontario L5C 4R3

Attention: R.L. (Rick) Kanabar

Dear Sir:

**Re: *Royal Bank of Canada v. Westcoast Appliance Centre 2014 Ltd., et al.*
Supreme Court of British Columbia, Vancouver Registry, Action No. S-261320**

We are the solicitors for Royal Bank of Canada ("RBC") in the above captioned court action.

Please find enclosed for service on you the following documents

- Notice of Civil Claim filed February 20, 2026;
- Notice of Application returnable February 23, 2026 at 9:00 a.m. at the Vancouver Registry; and
- Affidavit #1 of Tanja Deretic made on February 20, 2026 (body only).

Due to the size, we are only including the body of the Affidavit. Please reach out to my paralegal, Dannis Yang (dannis.yang@dentons.com) to request a copy of the exhibits.

Kindly confirm receipt by emailing the undersigned.

Best regards,
Dentons Canada LLP



Sherryl Dubo
Counsel

SD/dy
Enclosure

Yang, Dannis

From: Dubo, Sherryl
Sent: Tuesday, February 24, 2026 5:26 PM
To: Lavigne, Marc (Legal)
Cc: Kanabar, Rick; Finley, Crystal L.; Yang, Dannis
Subject: RE: Westcoast Appliance and Capital Iron Documents
Attachments: 2026-02-23 _ Order Made After Application (Adjournment Order), granted February 23, 2026.pdf

Good evening Marc, I haven't been contacted by local counsel on behalf of Wells Fargo and therefore I am forwarding to you a copy of the adjournment order that was made yesterday by Justice Veenstra, re-setting the receivership application to Friday, Feb. 27th.

Regards,

Sherryl Dubo
 Counsel

My pronouns are: She/Her/Hers

+1 604 648 6534

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This lawyer practices through a law corporation.

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From: Lavigne, Marc (Legal) <Marc.Lavigne@wellsfargo.com>
Sent: Monday, February 23, 2026 7:23 AM
To: Dubo, Sherryl <sherryl.dubo@dentons.com>
Cc: Kanabar, Rick <Rick.Kanabar@wellsfargo.com>; Finley, Crystal L. <Crystal.L.Finley@wellsfargo.com>
Subject: FW: Westcoast Appliance and Capital Iron Documents

[WARNING: EXTERNAL SENDER]

Hi Sherryl:

We acknowledge receipt of your application materials served on Wells Fargo late Friday, February 20, 2026 for a court appointment this Monday, February 23, 2026 at 9 a.m. Since these materials were not served within the required timelines, we have not had the time to fully review them. We are in the process of retaining BC counsel but won't have such counsel retained by 9:00 a.m. and therefore cannot appear at this morning's court appointment. Accordingly, we take no position on the relief sought by the Royal Bank and Wells Fargo reserves its rights pursuant to section 34 of the draft receivership order. We would ask that you advise the Court as such.

Additionally, we attach a copy of Wells Fargo's default notice to Capital Iron (2022) Ltd. and Westcoast Appliances Centre 2014 Ltd., and we provide this email and such attachment as a notice to Royal Bank pursuant to section 3.9 of the Priority Agreement among Royal Bank of Canada, Wells Fargo Capital Finance Corporation Canada and West Coast Appliance Centre 2014 Ltd. dated April 5, 2018 as well as another priority agreement among Royal Bank of Canada, Wells Fargo Capital Finance Corporation Canada and Capital Iron (2022) Ltd. dated November 21, 2023.

Once we have retained counsel, we will instruct them to reach out to you as soon as possible.

Thanks

Marc

Marc Lavigne
Assistant General Counsel and Executive Director
Wells Fargo Legal Department

Wells Fargo | Suite 900, 1290 Central Parkway West | Mississauga, Ontario L5C 4R3
MAC 01018-090 | Tel 416-276-5718

marc.lavigne@wellsfargo.com

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From: Finley, Crystal L. <Crystal.L.Finley@wellsfargo.com>
Sent: Monday, February 23, 2026 9:56 AM
To: Lavigne, Marc (Legal) <Marc.Lavigne@wellsfargo.com>
Subject: Westcoast Appliance and Capital Iron Documents

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Thank you for your cooperation.

This is **Exhibit "E"** referred to in the affidavit of Wen-Shih Yang made before me at Vancouver, British Columbia on this the 25th day of February, 2026.



A Commissioner for taking Affidavits
for British Columbia

Yang, Dannis

From: Yang, Dannis
Sent: Wednesday, February 25, 2026 9:34 AM
To: BARKER, Adam (VAN); FRANCISCO, Ronnell (SASK)
Cc: Ducluzeau, Chloe; HUANG, Helen (VAN); Dubo, Sherryl
Subject: RE: URGENT: Hearing Mon. Feb. 23rd at 9:00am - Receivership application for WESTCOAST APPLIANCE CENTRE 2014 LTD. and CAPITAL IRON (2022) LTD.
Attachments: 2026-02-23 _ Requisition - General (to adjourn application).pdf; 2026-02-23 _ Order Made After Application (Adjournment Order), granted February 23, 2026.pdf

Hi Adam and Ronnell,

Please find enclosed a copy of the entered order and filed requisition resetting hearing to this Friday Feb. 27 at 9:00 a.m.

Regards,

Dannis Yang
 Paralegal

My pronouns are: She/Her/Hers

 +1 604 639 4174

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From: Yang, Dannis
Sent: Friday, February 20, 2026 5:53 PM
To: BARKER, Adam (VAN) <Adam.BARKER@bdc.ca>; Dubo, Sherryl <sherryl.dubo@dentons.com>
Cc: Ducluzeau, Chloe <chloe.ducluzeau@dentons.com>; HUANG, Helen (VAN) <helen.huang@bdc.ca>; FRANCISCO, Ronnell (SASK) <Ronnell.FRANCISCO@bdc.ca>
Subject: RE: URGENT: Hearing Mon. Feb. 23rd at 9:00am - Receivership application for WESTCOAST APPLIANCE CENTRE 2014 LTD. and CAPITAL IRON (2022) LTD.

Hi Adam and Ronnell,


Please find enclosed filed copies of the Notice of Application and the body of Affidavit #1 of T. Deretic. I am only including the body due to the size, please let me know if you would like a copy of the exhibits.

Kindly confirm receipt of this email.

Regards,

Dannis Yang
 Paralegal

My pronouns are: She/Her/Hers

 +1 604 639 4174

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From: BARKER, Adam (VAN) <Adam.BARKER@bdc.ca>
Sent: Friday, February 20, 2026 3:14 PM
To: Dubo, Sherryl <sherryl.dubo@dentons.com>
Cc: Yang, Dannis <dannis.yang@dentons.com>; Ducluzeau, Chloe <chloe.ducluzeau@dentons.com>; HUANG, Helen (VAN) <helen.huang@bdc.ca>; FRANCISCO, Ronnell (SASK) <Ronnell.FRANCISCO@bdc.ca>
Subject: RE: URGENT: Hearing Mon. Feb. 23rd at 9:00am - Receivership application for WESTCOAST APPLIANCE CENTRE 2014 LTD. and CAPITAL IRON (2022) LTD.

[WARNING: EXTERNAL SENDER]

Hi Sherryl,

Thanks for your email. Please be advised that Ronnell Francisco is looking after this account for us at BDC. I have forwarded the documents you attached to him and have copied him on this email. We will respond to your request when we are able.

Kind regards,

Adam Barker
 Senior Legal Counsel | Conseiller juridique senior
 T 604-666-6420

bdc.ca

From: Dubo, Sherryl <sherryl.dubo@dentons.com>
Sent: February 20, 2026 2:14 PM
To: BARKER, Adam (VAN) <Adam.BARKER@bdc.ca>
Cc: Yang, Dannis <dannis.yang@dentons.com>; Ducluzeau, Chloe <chloe.ducluzeau@dentons.com>; HUANG, Helen (VAN) <helen.huang@bdc.ca>
Subject: FW: URGENT: Hearing Mon. Feb. 23rd at 9:00am - Receivership application for WESTCOAST APPLIANCE CENTRE 2014 LTD. and CAPITAL IRON (2022) LTD.
Importance: High

Courriel externe / external email

Hi Adam, I hope you are doing well!

I'm acting for RBC on a file where we are applying to appoint a receiver on Monday. I got Helen's out of office reply to my email below and so I am forwarding it along to see if this is something you can take a look at.

Sherryl

Sherryl Dubo
 Counsel

My pronouns are: She/Her/Hers

+1 604 648 6534

Dentons Canada LLP | Vancouver

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From: Dubo, Sherryl

Sent: Friday, February 20, 2026 2:02 PM

To: HUANG, Helen (VAN) <helen.huang@bdc.ca>

Cc: Yang, Dannis <dannis.yang@dentons.com>; Ducluzeau, Chloe <chloe.ducluzeau@dentons.com>

Subject: URGENT: Hearing Mon. Feb. 23rd at 9:00am - Receivership application for WESTCOAST APPLIANCE CENTRE 2014 LTD. and CAPITAL IRON (2022) LTD.

Importance: High

Hi Helen,

Dentons Canada LLP is acting for RBC in respect of a receivership application which we are bringing on short notice on Monday as the borrowers have advised us they will be shutting their doors today.

The borrowers, WESTCOAST APPLIANCE CENTRE 2014 LTD. and CAPITAL IRON (2022) LTD., are appliance retailers in Victoria, B.C.

I see that BDC has a GSA registered in the PPR against both companies and I am wanting to give notice to the bank that a hearing has been scheduled **in Vancouver before Justice Veenstra at 9:00am on Monday, February 23rd**.

I'm attaching RBC's unfiled Notice of Application and the form of Receivership Order sought (blacklined to the BC model order). At this moment I only have unfiled materials and RBC's representative is going to be swearing an affidavit. Once the affidavit is sworn, we will circulate a copy of that as well.

Once you've had a chance to review these materials, please let me know if the bank is supportive of the receivership application or if you engage counsel, please ask them to give me a call.

Thank you,

Sherryl

Sherryl Dubo

Counsel

My pronouns are: She/Her/Hers

+1 604 648 6534

sherryl.dubo@dentons.com | Bio | Website

Dentons Canada LLP | 20th Floor, 250 Howe Street, Vancouver, BC, V6C 3R8, Canada



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This lawyer practices through a law corporation.

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This is **Exhibit "F"** referred to in the affidavit of Wen-Shih Yang made before me at Vancouver, British Columbia on this the 25th day of February, 2026.

A handwritten signature in blue ink, appearing to be 'W. Shih Yang', written over a horizontal line.

A Commissioner for taking Affidavits
for British Columbia

Yang, Dannis

From: * VAN Mail and Reception <VancouverMailReception@justice.gc.ca>
Sent: Wednesday, February 25, 2026 9:50 AM
To: Yang, Dannis
Cc: * VAN Mail and Reception
Subject: RE: RESET - Feb. 23 9AM Hearing - RBC v Westcoast Appliance Centre 2014 Ltd.; SCBC Vancouver Registry No. S-261320

[WARNING: EXTERNAL SENDER]

Hello,

Confirming that your email was received and has been forwarded to the appropriate group for review.

Receipt confirmed on behalf of the Attorney General of Canada (AGC) only and not on behalf of other parties.

Thank you,

[EC]

 Bonjour,

Nous accusons la réception de votre courriel et nous l'avons transmis au groupe pertinent.

Nous acceptons uniquement les documents au nom du Procureur Générale du Canada (PGC) et ne pas pour des autres parties.

Salutations,

[EC]

Mail and Reception | Courrier et Réception
 Department of Justice | Ministère de la Justice Canada
 BC Regional Office | Bureau Régional de la C.-B.
 900 – 840 Howe Street, Vancouver, B.C. | Vancouver, C.-B. V6Z 2S9
 Government of Canada | Gouvernement du Canada
VancouverMailReception@justice.gc.ca

The 9th floor Reception desk at 840 Howe Street Vancouver is open to the public Monday to Friday (except holidays) between the hours of 8:30 AM to 4:30 PM.

From: Yang, Dannis <dannis.yang@dentons.com>
Sent: Wednesday, February 25, 2026 9:36 AM
To: * VAN Mail and Reception <VancouverMailReception@justice.gc.ca>
Cc: Dubo, Sherryl <sherryl.dubo@dentons.com>; Ducluzeau, Chloe <chloe.ducluzeau@dentons.com>
Subject: RE: RESET - Feb. 23 9AM Hearing - RBC v Westcoast Appliance Centre 2014 Ltd.; SCBC Vancouver Registry No. S-261320

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Good morning,

Please find enclosed a copy of the Order of Justice Veenstra and filed requisition resetting hearing to this Friday Feb. 27 at 9:00 a.m.

Regards,

Dannis Yang
Paralegal

My pronouns are: She/Her/Hers

+1 604 639 4174

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From: Yang, Dannis
Sent: Friday, February 20, 2026 5:51 PM
To: AGC_PGC_VANCOUVER@JUSTICE.GC.CA
Cc: Dubo, Sherryl <sherryl.dubo@dentons.com>; Ducluzeau, Chloe <chloe.ducluzeau@dentons.com>
Subject: Feb. 23 9AM Hearing - RBC v Westcoast Appliance Centre 2014 Ltd.; SCBC Vancouver Registry No. S-261320

Good evening,

Please find enclosed for service on you the following documents:

- Notice of application returnable Feb. 23, 2026 at 9:00 AM; and
- Affidavit #1 of T. Deretic made on Feb. 20, 2026 (body only).

Due to the size, I am only including the body of the affidavit. Please reach out to me for a full copy of the affidavit.

Kindly confirm receipt of this email.

Regards,

Dannis Yang
Paralegal

My pronouns are: She/Her/Hers

+1 604 639 4174

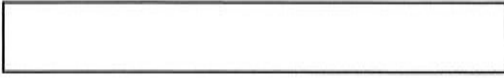
dannis.yang@dentons.com | [Bio](#) | [Website](#)

Dentons Canada LLP | 20th Floor, 250 Howe Street, Vancouver, BC, V6C 3R8, Canada



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This is **Exhibit "G"** referred to in the affidavit of Wen-Shih Yang made before me at Vancouver, British Columbia on this the 25th day of February, 2026.

A handwritten signature in blue ink, consisting of stylized cursive letters, positioned above a horizontal line.

A Commissioner for taking Affidavits
for British Columbia

February 20, 2026

File no. 314832-1005

VIA COURIER

Ontap Capital Corp.
8750 Jane Street, Unit 16
Vaughan, ON L4K 2M9

Dear Sirs/Mesdames:

Re: *Royal Bank of Canada v. Westcoast Appliance Centre 2014 Ltd., et al.*
Supreme Court of British Columbia, Vancouver Registry, Action No. S-261320

We are the solicitors for Royal Bank of Canada ("RBC") in the above captioned court action.

Please find enclosed for service on you the following documents

- Notice of Application filed February 20, 2026;
- Affidavit #1 of Tanja Deretic made on February 20, 2026 (body only); and
- Requisition resetting hearing to Friday, February 27, 2026 at 9:00 a.m.

Due to the size, we are only including the body of the Affidavit. Please reach out to my paralegal, Dannis Yang (dannis.yang@dentons.com) to request a copy of the exhibits.

Kindly confirm receipt by emailing the undersigned.

Best regards,
Dentons Canada LLP



Sherryl Dubo
Counsel

SD/dy
Enclosure

Yang, Dannis

From: FedEx Tracking <TrackingUpdates@fedex.com>
Sent: Tuesday, February 24, 2026 7:31 AM
To: Yang, Dannis
Subject: Your shipment was delivered 889010932913

[WARNING: EXTERNAL SENDER]



Your shipment was delivered.

Delivery Date

Tuesday, 02/24/2026
10:25

Delivered to

8750 JANE ST, VAUGHAN, ON L4K2M9

Received by

A.Alex

Report missing package

Tracking details

Tracking ID	889010932913
From	DENTONS CANADA LLP 250 Howe Street Unit 1900 (19th floor) VANCOUVER, BC, CA V6C3R8
To	Ontap Capital Corp. 8750 Jane Street, Unit 16 VAUGHAN, ON, CA L4K2M9
Ship date	Mon 2/23/2026 04:23 PM
Number of pieces	1
Total shipment weight	0.20 KG
Service	FedEx Priority Overnight®
Reference	SAD/dy/314832-1005
Shipper reference	SAD/dy/314832-1005

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ID 1026

February 24, 2026

File no. 314832-1005

VIA COURIER

The Bank of Nova Scotia
10 Wright Boulevard
Stratford, ON N5A 7X9

Dear Sirs/Mesdames:

Re: *Royal Bank of Canada v. Westcoast Appliance Centre 2014 Ltd., et al.*
Supreme Court of British Columbia, Vancouver Registry, Action No. S-261320

We are the solicitors for Royal Bank of Canada ("RBC") in the above captioned court action.

Please find enclosed for service on you the following documents

- Notice of Application filed February 20, 2026;
- Affidavit #1 of Tanja Deretic made on February 20, 2026 (body only); and
- Requisition resetting hearing to Friday, February 27, 2026 at 9:00 a.m.

Due to the size, we are only including the body of the Affidavit. Please reach out to my paralegal, Dannis Yang (dannis.yang@dentons.com) to request a copy of the exhibits.

Kindly confirm receipt by emailing the undersigned.

Best regards,
Dentons Canada LLP



Sherryl Dubo
Counsel

SD/dy
Enclosure

Yang, Dannis

From: FedEx Tracking <TrackingUpdates@fedex.com>
Sent: Tuesday, February 24, 2026 4:39 PM
To: Yang, Dannis
Subject: We have your shipment 889046801577.

[WARNING: EXTERNAL SENDER]



We have your shipment.

Scheduled delivery date

Wed 2/25/2026

Estimated between 10:10 and 14:10

Take more control of your shipments

Save delivery instructions, get picture proof of delivery, and more.

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Some delivery options might not be available on the day of delivery.

Tracking details

Tracking ID	889046801577
From	DENTONS CANADA LLP 250 Howe Street Unit 1900 (19th floor) VANCOUVER, BC, CA V6C3R8
To	The Bank of Nova Scotia 10 Wright Boulevard STRATFORD, ON, CA N5A7X9
Ship date	Tue 2/24/2026 04:27 PM
Number of pieces	1
Total shipment weight	0.10 KG
Service	FedEx Standard Overnight®

Reference SAD/dy/314832-1005

Shipper reference SAD/dy/314832-1005

[TRACK SHIPMENT](#)

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ID 1029

February 24, 2026

File no. 314832-1005

VIA PRIORITY MAIL

Ford Credit Canada Company
PO Box 2400
Edmonton, AB T5J 5C7

Dear Sirs/Mesdames:

Re: *Royal Bank of Canada v. Westcoast Appliance Centre 2014 Ltd., et al.*
Supreme Court of British Columbia, Vancouver Registry, Action No. S-261320

We are the solicitors for Royal Bank of Canada ("RBC") in the above captioned court action.

Please find enclosed for service on you the following documents

- Notice of Application filed February 20, 2026;
- Affidavit #1 of Tanja Deretic made on February 20, 2026 (body only); and
- Requisition resetting hearing to Friday, February 27, 2026 at 9:00 a.m.

Due to the size, we are only including the body of the Affidavit. Please reach out to my paralegal, Dannis Yang (dannis.yang@dentons.com) to request a copy of the exhibits.

Kindly confirm receipt by emailing the undersigned.

Best regards,
Dentons Canada LLP



Sherryl Dubo
Counsel

SD/dy
Enclosure

**Tracking number:**

9880452869505553

Expected delivery: Tomorrow by end of day

Shipping service: Priority

Sender: Unavailable

Reference number 1: SAD/DY/314832-1005

Delivery standard: Feb. 26

Latest updates

Date	Time	Location	Progress	Post office
Feb. 25	12:20 pm	EDMONTON,AB	Delivery may be delayed due to transportation delay	
Feb. 24	7:37 pm	RICHMOND,BC	Item in transit	
Feb. 24	4:37 pm	RICHMOND,BC	Item processed	
Feb. 24	3:09 pm	RICHMOND,BC	Item picked up by Canada Post	
Feb. 24			Electronic information submitted by shipper	

Features and options

February 24, 2026

File no. 314832-1005

VIA COURIER

Canacap
4211 Yonge St Suite 402
Toronto, ON M2P 2A9

Dear Sirs/Mesdames:

Re: *Royal Bank of Canada v. Capital Iron 2022 Ltd., et al.*
Supreme Court of British Columbia, Vancouver Registry, Action No. S-261320

We are the solicitors for Royal Bank of Canada ("RBC") in the above captioned court action.

Please find enclosed for service on you the following documents

- Notice of Application filed February 20, 2026;
- Affidavit #1 of Tanja Deretic made on February 20, 2026 (body only); and
- Requisition resetting hearing to Friday, February 27, 2026 at 9:00 a.m.

Due to the size, we are only including the body of the Affidavit. Please reach out to my paralegal, Dannis Yang (dannis.yang@dentons.com) to request a copy of the exhibits.

Kindly confirm receipt by emailing the undersigned.

Best regards,
Dentons Canada LLP



Sherryl Dubo
Counsel

SD/dy
Enclosure

Yang, Dannis

From: FedEx Tracking <TrackingUpdates@fedex.com>
Sent: Wednesday, February 25, 2026 7:37 AM
To: Yang, Dannis
Subject: Your shipment was delivered 889046710145

[WARNING: EXTERNAL SENDER]



Your shipment was delivered.

Delivery Date

Wednesday, 02/25/2026
10:31

Delivered to

4211 YONGE ST UNIT 402, TORONTO, ON M2P2A9

Received by

L.Lyann

Report missing package

Tracking details

Tracking ID	889046710145
From	DENTONS CANADA LLP 250 Howe Street Unit 1900 (19th floor) VANCOUVER, BC, CA V6C3R8
To	Canacap 4211 Yonge St Suite 402 TORONTO, ON, CA M2P2A9
Ship date	Tue 2/24/2026 04:27 PM
Number of pieces	1
Total shipment weight	0.10 KG
Service	FedEx Standard Overnight®
Reference	SAD/dy/314832-1005
Shipper reference	SAD/dy/314832-1005

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ID 1026

February 24, 2026

File no. 314832-1005

VIA COURIER

Merchant Capital Group LLC
2200 Biscayne Blvd Suite 200
Miami FL 33137
United States of America

Dear Sirs/Mesdames:

Re: *Royal Bank of Canada v. Capital Iron 2022 Ltd., et al.*
Supreme Court of British Columbia, Vancouver Registry, Action No. S-261320

We are the solicitors for Royal Bank of Canada ("RBC") in the above captioned court action.

Please find enclosed for service on you the following documents

- Notice of Application filed February 20, 2026;
- Affidavit #1 of Tanja Deretic made on February 20, 2026 (body only); and
- Requisition resetting hearing to Friday, February 27, 2026 at 9:00 a.m.

Due to the size, we are only including the body of the Affidavit. Please reach out to my paralegal, Dannis Yang (dannis.yang@dentons.com) to request a copy of the exhibits.

Kindly confirm receipt by emailing the undersigned.

Best regards,
Dentons Canada LLP



Sherryl Dubo
Counsel

SD/dy
Enclosure

Yang, Dannis

From: FedEx Tracking <TrackingUpdates@fedex.com>
Sent: Tuesday, February 24, 2026 5:01 PM
To: Yang, Dannis
Subject: You're getting a shipment 889046541274

[WARNING: EXTERNAL SENDER]



You're getting a shipment.

Tracking details

Tracking ID 889046541274

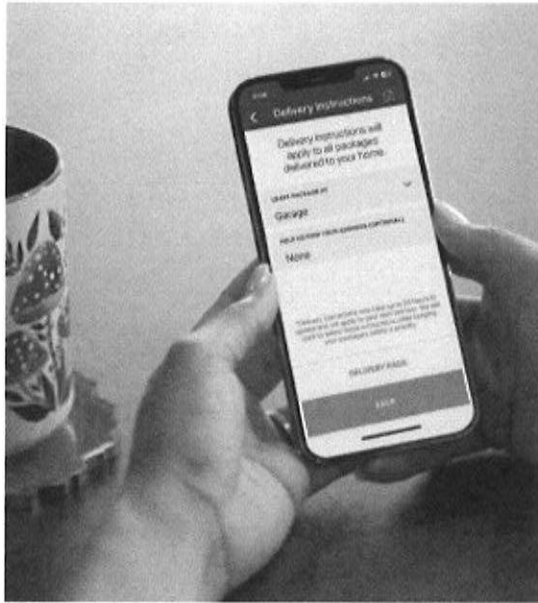
From DENTONS CANADA LLP
250 HOWE STREET
UNIT 1900 (19TH FLOOR)
VANCOUVER, BC, CA
V6C3R8

To MERCHANT CAPITAL GROUP LLC
2200 BISCAYNE BLVD
SUITE 200
Suite 200

MIAMI, FL, US
33137

Ship date	Tue 2/24/2026 04:27 PM
Number of pieces	1
Total shipment weight	0.10 KG
Service	FedEx International Priority®
Reference	SAD/dy/314832-1005
Shipper reference	SAD/dy/314832-1005

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ID 1030

February 24, 2026

File no. 314832-1005

VIA COURIER

Toyota Industries Commercial Finance Canada, Inc.
630 – 401 The West Mall
Toronto, ON M9C 5J5

Dear Sirs/Mesdames:

Re: *Royal Bank of Canada v. Westcoast Appliance Centre 2014 Ltd., et al.*
Supreme Court of British Columbia, Vancouver Registry, Action No. S-261320

We are the solicitors for Royal Bank of Canada (“RBC”) in the above captioned court action.

Please find enclosed for service on you the following documents

- Notice of Application filed February 20, 2026;
- Affidavit #1 of Tanja Deretic made on February 20, 2026 (body only); and
- Requisition resetting hearing to Friday, February 27, 2026 at 9:00 a.m.

Due to the size, we are only including the body of the Affidavit. Please reach out to my paralegal, Dannis Yang (dannis.yang@dentons.com) to request a copy of the exhibits.

Kindly confirm receipt by emailing the undersigned.

Best regards,
Dentons Canada LLP



Sherryl Dubo
Counsel

SD/dy
Enclosure

Yang, Dannis

From: FedEx Tracking <TrackingUpdates@fedex.com>
Sent: Wednesday, February 25, 2026 10:45 AM
To: Yang, Dannis
Subject: Your shipment was delivered 889046421957

[WARNING: EXTERNAL SENDER]



Your shipment was delivered.

Delivery Date

Wednesday, 02/25/2026
13:38

Delivered to

401 THE WEST MALLUNIT 630, TORONTO, ON M9C5J5

Received by

Signature on File

Report missing package

Tracking details

Tracking ID	889046421957
From	DENTONS CANADA LLP 250 Howe Street Unit 1900 (19th floor) VANCOUVER, BC, CA V6C3R8
To	Finance Canada, Inc. 630 - 401 The West Mall TORONTO, ON, CA M9C5J5
Ship date	Tue 2/24/2026 04:27 PM
Number of pieces	1
Total shipment weight	0.10 KG
Service	FedEx Priority Overnight®
Reference	SAD/dy/314832-1005
Shipper reference	SAD/dy/314832-1005

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Thank you for your business.

ID 1026