



S-222403
Vancouver Registry

In the Supreme Court of British Columbia

Plaintiffs: CRYSTAL CURRENCY EXCHANGE INC.

Defendants: DAN QING WANG (also known as LISA WANG) and PU WANG

RESPONSE TO CIVIL CLAIM

Filed by: Pu Wang, the defendant ("Pu Wang").

Part 1: RESPONSE TO AMENDED NOTICE OF CIVIL CLAIM FACTS

Division 1 – Defendant's Response to Facts

1. The facts alleged in paragraphs 4-5 of Part I of the Notice of Civil Claim are admitted.
2. The facts alleged in paragraphs 3, and 20-22 of Part 1 of the Notice of Civil Claim are denied.
3. The facts alleged in paragraphs 1-2, 6-19, and 23-31 of Part 1 of the Notice of Civil Claim are outside the knowledge of Pu Wang.

Division 2 – Defendant's Version of Facts

4. Pu Wang adopts the terminologies and interpretations used in the Notice of Civil Claim unless otherwise stated herein.
5. Pu Wang currently resides at the 5755 Burns Place.
6. In or about March 2022, Ms. Wang moved out of the 5755 Burns Place.

Transfer of title on the 5755 Burns Place

7. On June 30, 2005, Pu Wang purchased the 5755 Burns Place which was registered in her name alone.

8. On August 21, 2006, Pu Wang paid off the mortgage registered on the 5755 Burns Place.
9. On March 30, 2015, Pu Wang transferred to Ms. Wang a half legal interest in the 5755 Burns Place for estate planning purposes in case Pu Wang passed away or in case she returned to China.
10. On May 20, 2016, Pu Wang transferred to Ms. Wang the other half legal interest in the 5755 Burns Place because Pu Wang at the time was going to purchase a property at 5438 Hardwick St. Burnaby BC (the "Hardwick Property") in her name alone, and to use the Hardwick Property as her primary residence to avoid any capital gains tax after she sold the Hardwick Property later.
11. On June 17, 2020, Pu Wang purchased another property at 6376 Burns St. Burnaby BC (the "6376 Burns Street") in her name alone.
12. On October 29, 2020, Pu Wang sold the Hardwick Property.
13. On or about January 25, 2022, at Pu Wang's request, Ms. Wang transferred back to Pu Wang the legal interest in the 5755 Burns Place.
14. At all material times, Ms. Wang made no payment or contribution to the acquisition, maintenance, upkeep, property tax, and mortgage of the 5755 Burns Place.
15. At all material times, Pu Wang never intended to transfer the 5755 Burns Place as a gift outright to Ms. Wang.

Crystal Currency's allegations against Ms. Wang

16. Pu Wang has no knowledge of those allegations by Crystal Currency against Ms. Wang except for Ms. Wang's employment with Crystal Currency.

Division 3 – Additional Facts

17. None.

Part 2: RESPONSE TO RELIEF SOUGHT

18. The Defendant consents to the granting of the relief sought in none of the paragraphs of Part 2 of the Notice of Civil Claim.
19. The Defendant opposes the granting of the relief sought in paragraph 32 of Part 2 of the Notice of Civil Claim.

20. The Defendant takes no position on the granting of the relief sought in none of the paragraphs of Part 2 of the Notice of Civil Claim.

Part3: LEGAL BASIS

21. At all material times, Pu Wang never intended to give the 5755 Burns Place as an outright gift to Ms. Wang.

22. Pu Wang only transferred to Ms. Wang the legal interest in the 5755 Burns Place, and Pu Wang keeps all the beneficial interest of the 5755 Burns Place.

23. Ms. Wang was an adult child when the legal interest in the 5755 Burns Place was transferred to her.

24. Ms. Wang held the 5755 Burns Place in a resulting trust for Pu Wang.

25. There is a rebuttable presumption of resulting trust where the parent makes a transfer to the adult child gratuitously (*Pecore v. Pecore*, 2007 SCC 17).

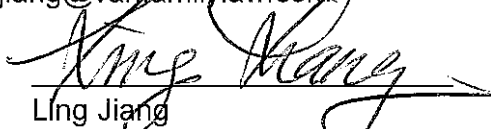
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Date: May 26, 2022


Ling Jiang
Signature of lawyer for the Defendant
Pu Wang

Rule 7-1(1) of the Supreme Court Civil Rules states:

(1) Unless all parties of record consent or the court otherwise orders, each party of record to an action must, within 35 days after the end of the pleading period,

(a) prepare a list of documents in Form 22 that lists

(i) all documents that are or have been in the party's possession or control and that could, if available, be used by any party at trial to prove or disprove a material fact,

and

(ii) all other documents to which the party intends to refer at trial, and

(b) serve the list on all parties of record.