

*ONTARIO*  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)

B E T W E E N:

CAMERON STEPHENS MORTGAGE CAPITAL LTD.

Applicant

and

2011836 ONTARIO CORP., JEFFERSON PROPERTIES LIMITED  
PARTNERSHIP, 1000162801 ONTARIO CORP., AMERICAN CORPORATION  
and 1000199992 ONTARIO CORP.

Respondents

APPLICATION UNDER SUBSECTION 243(1) OF THE *BANKRUPTCY AND  
INSOLVENCY ACT*, R.S.C., 1985 C, B-3, AS AMENDED AND SECTION 101 OF THE  
*COURTS OF JUSTICE ACT*, R.S.O. 1990, C.43, AS AMENDED

**NOTICE OF MOTION**

February 6, 2026

FENGXI FANSEAY WANG  
33 East Street, Suite 15E,  
Fuzhou, China, 350001  
Fwang2025@icloud.com

*Self-Represented Respondent*

TO: SERVICE LIST

TAKE NOTICE that the moving party will make a motion to the Ontario Superior Court of Justice (Commercial List), at a date and time to be fixed by the Court, to be determined in writing pursuant to Rule 37.12, for an order granting the relief set out below.

#### RELIEF SOUGHT

1. An Order pursuant to Rule 15.01(2) of the Rules of Civil Procedure confirming that Fansey Wang is permitted to appear, make submissions, and conduct proceedings on behalf of the Respondents in this receivership proceeding.
2. In the alternative, an Order granting such further or other directions regarding representation as this Honourable Court considers just.
3. Such further and other relief as this Honourable Court deems just.
4. This motion be determined in writing pursuant to Rule 37.12, as it is procedural, record-based, and raises no disputed factual issues requiring viva voce evidence.

#### GROUND FOR THE MOTION

The grounds for the motion are as follows:

1. On May 2, 2025, Justice Steele of the Commercial List orally permitted Fansey Wang to appear and make submissions on behalf of the Debtors in these proceedings.
2. All parties, including counsel for the Receiver and the secured creditor, were present at that hearing and were aware of the Court's direction.
3. Since May 2, 2025, Mr. Wang has appeared and made submissions in more than ten subsequent hearings in this proceeding without objection from any party.

4. The Receiver and secured creditor acquiesced to Mr. Wang's representation through their conduct, including participation in hearings and receipt of submissions without raising a Rule 15 objection.
5. No party brought a timely motion challenging Mr. Wang's standing under Rule 15.01(2).
6. The issue of representation was not decided by the Court of Appeal for Ontario and was expressly left open.
7. Procedural fairness, efficiency, and the orderly administration of justice favour confirmation of representation rather than disruption of an ongoing receivership proceeding.
8. This motion seeks procedural clarification only and does not reopen or relitigate any substantive orders previously made.
9. On September 19, 2025, Mr. Wang served a written submission seeking leave to regularize his participation on behalf of the Respondents. The Motion Record of that submission is enclosed for the Court's reference as Schedule "A", without seeking any substantive relief in respect of it.
10. Rule 15.01(2) expressly permits the Court to authorize representation where justice so requires.

#### LAW RELIED UPON

1. Rule 15.01(2) of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194.
2. The Court's inherent jurisdiction to control its own process.
3. Such further and other authorities as counsel may advise and this Honourable Court may permit.

## EVIDENCE

This motion will be argued without affidavit evidence, relying on:

1. The court record, including prior endorsements and hearing history;
2. The conduct of the parties in this proceeding; and
3. Schedule “A” – Submission dated September 19, 2025 (for reference only).

## CONCLUSION

This motion is brought to ensure procedural clarity, fairness, and efficiency.

No prejudice arises to any party.

Confirmation of representation will avoid unnecessary disruption, cost, and satellite litigation.

DATED: February 6, 2026

Fengxi Fansay Wang  
*Self-Represented Respondent*  
33 East Street, Suite 15E,  
Fuzhou, China, 350001  
Fwang2025@icloud.com

SCHEDULE "A"

Submission of Fansey Wang, dated September 19, 2025, seeking leave to regularize participation on behalf of the Respondents (previously served and filed).

ONTARIO  
SUPERIOR COURT OF JUSTICE  
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– and –

2011836 ONTARIO CORP., JEFFERSON PROPERTIES LIMITED PARTNERSHIP,  
1000162801 ONTARIO CORP., AMERICAN CORPORATION, and 1000199992 ONTARIO  
CORP.  
*Respondents*

**MOTION RECORD**

(Motion for Leave to Represent Corporations on a Self-Represented Basis)

Returnable: To be scheduled ASAP

Filed by:  
Fengxi (Fansey) Wang  
Self-Represented Respondent  
33 East Street, Suite 16E  
Fuzhou, China, 350001  
Email: [fwang2025@icloud.com](mailto:fwang2025@icloud.com)

Dated: September 19, 2025

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ONTARIO SUPERIOR COURT OF JUSTICE (COMMERCIAL LIST)

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– and –

2011836 ONTARIO CORP., JEFFERSON PROPERTIES LIMITED PARTNERSHIP,  
1000162801 ONTARIO CORP., AMERICAN CORPORATION, and 1000199992 ONTARIO  
CORP. – Respondents

**NOTICE OF MOTION**

(Urgent Motion for Leave to Represent Corporations on a Self-Represented Basis)

Fengxi (Fansey) Wang  
Self-Represented Respondent  
33 East Street, Suite 16E  
Fuzhou, China, 350001  
Email:  
[fwang2025@icloud.com](mailto:fwang2025@icloud.com)

TO THE PARTIES ON THE SERVICE LIST:

The Respondent, Fengxi (Fanseay) Wang, will make a motion to a Judge of the Commercial List at 330 University Avenue, Toronto, Ontario, on a date and time to be fixed by the Registrar.

### **PROPOSED METHOD OF HEARING**

The motion is to be heard orally, in person or by videoconference, as the Court may direct.

### **RELIEF REQUESTED**

1. An Order granting leave to Mr. Wang, as director and shareholder of the Respondent corporations, to represent the corporations on a self-represented basis in these proceedings, pursuant to Rule 15.01(2) of the Rules of Civil Procedure and the inherent jurisdiction of this Court;
2. Such further and other relief as this Honorable Court may deem just.

### **GROUND FOR THE MOTION**

- (a) Mr. Wang is the director and shareholder of the Respondent corporations and has full knowledge of the facts and issues in this proceeding;
- (b) The corporations are insolvent and have no funds to retain counsel;
- (c) Without leave, the corporations' positions cannot be properly presented to the Court, which would cause prejudice;
- (d) Mr. Wang has already actively participated by preparing and serving affidavits, factums, and submissions;
- (e) **In an endorsement following the Receiver's Rule 2.1 motion (Sept. 2025), the Court confirmed that Mr. Wang's May 9, 2025 motion was not frivolous, but noted that he had not**

been granted leave to represent the corporations. This motion is brought to regularize that procedural requirement so the corporations' position can be heard properly;

(f) Rule 15.01(2) of the Rules of Civil Procedure and the Court's inherent jurisdiction to control its own process;

(g) Such further and other grounds as counsel (if any) may advise and this Court may permit.

#### **EVIDENCE TO BE RELIED UPON**

1. The Affidavit of Fengxi (Fansey) Wang to be sworn in support of this motion, and such further evidence as may be advised.

Dated at Fuzhou this 19<sup>th</sup> day of September 2025

Respectfully submitted,



Fengxi (Fansey) Wang  
Self-Represented Respondent  
33 East Street, Suite 16E  
Fuzhou, China, 350001  
Email: [fwang2025@icloud.com](mailto:fwang2025@icloud.com)

ONTARIO SUPERIOR COURT OF JUSTICE (COMMERCIAL LIST)

BETWEEN:

CAMERON STEPHENS MORTGAGE CAPITAL LTD. – Applicant

– and –

2011836 ONTARIO CORP., JEFFERSON PROPERTIES LIMITED PARTNERSHIP,  
1000162801 ONTARIO CORP., AMERICAN CORPORATION, and 1000199992 ONTARIO  
CORP. – Respondents

**UNAFFIRMED AFFIDAVIT OF FENGXI (FANSEAY) WANG  
(TO BE SWORN)**

Fengxi (Fansey) Wang  
Self-Represented Respondent  
33 East Street, Suite 16E  
Fuzhou, China, 350001  
Email:  
[fwang2025@icloud.com](mailto:fwang2025@icloud.com)

TO THE PARTIES ON THE SERVICE LIST:

I, Fengxi Fanshay Wang, of the City of Fuzhou, China, state as follows:

1. I am a director and shareholder of the Respondent corporations, and I make this affidavit in support of my motion for leave to represent the corporations on a self-represented basis.
2. The corporations are under receivership and have no funds to retain counsel. I also do not have the personal resources to fund counsel for them.
3. I have been directly involved in this proceeding from the outset. I have filed and served affidavits, factums, and reply to submissions, and I am fully familiar with the facts, documents, and legal issues.
4. I have acted diligently and responsibly in preparing and serving documents, ensuring the Court and all parties are informed.
5. On May 9, 2025, I filed a motion concerning the Receiver's management of the Project. The Receiver sought to have that motion dismissed under Rule 2.1. The Court refused to dismiss it as frivolous but noted that I had not been granted leave to represent the corporations. As a result, the merits of that motion were not heard. I now seek leave so the corporations' position can be presented properly.
6. Without leave, the corporations' position will not be presented at all, resulting in serious prejudice.
7. I therefore respectfully request that this Honorable Court grant me leave to represent the corporations on a self-represented basis.

**NOTE:** This affidavit is filed as unaffirmed due to my present overseas travel and inability to access a commissioner or notary immediately. I undertake to swear or affirm this affidavit formally at the earliest opportunity and file the commissioned version.

Dated this 19th day of September 2025.

A handwritten signature in black ink, appearing to read 'Fengxi Fansey Wang', written in a cursive style.

Fengxi Fansey Wang  
(Self-Represented Respondent)

ONTARIO SUPERIOR COURT OF JUSTICE (COMMERCIAL LIST)

BETWEEN:

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– and –

2011836 ONTARIO CORP., JEFFERSON PROPERTIES LIMITED PARTNERSHIP,  
1000162801 ONTARIO CORP., AMERICAN CORPORATION, and 1000199992 ONTARIO  
CORP. – Respondents

**CERTIFICATE OF SERVICE**

I, Fengxi (Fansey) Wang, certify that on [date], I served the following document in this proceeding by email:

Motion Record – Motion for Leave to Represent the Respondent Corporations on a Self-Represented Basis (containing: Cover and Index; Notice of Motion; Unaffirmed Affidavit of Fengxi (Fansey) Wang (to be sworn); Certificate of Service; and Service List.

The above document was served by email to the following parties, at the addresses provided on the Service List.

Service by email is permitted under the Rules of Civil Procedure and the Commercial List practice direction.

Dated: Fuzhou, China, this 19<sup>th</sup> day of September, 2025



Fengxi (Fansey) Wang  
Self-Represented Respondent  
33 East Street, Suite 16E  
Fuzhou, China, 350001  
Email: [fwang2025@icloud.com](mailto:fwang2025@icloud.com)

ONTARIO SUPERIOR COURT OF JUSTICE (COMMERCIAL LIST)

BETWEEN:

CAMERON STEPHENS MORTGAGE CAPITAL LTD. – Applicant

– and –

2011836 ONTARIO CORP., JEFFERSON PROPERTIES LIMITED PARTNERSHIP,  
1000162801 ONTARIO CORP., AMERICAN CORPORATION, and 1000199992 ONTARIO  
CORP. – Respondents

**SERVICE LIST**

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Cayman Islands

**CAMERON STEPHENS MORTGAGE CAPITAL LTD.**

-and-

**2011836 ONTARIO CORP. et al**

Applicant

Respondents

Court File No. CV-23-00710795-00CL

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
COMMERCIAL LIST**

PROCEEDING COMMENCED AT  
TORONTO

**MOTION RECORD  
(Motion for Leave to Represent Corporations  
on a Self-Represented Basis)**

FENGXI FANSEAY WANG  
Self-Represented Respondent

33 East Street, Suite 15E,  
Fuzhou, China, 350001  
Email: Fwang2025@icloud.com  
Tel: 0086-591-8750 1955

RCP-E 4C (May 1, 2016)

**CAMERON STEPHENS MORTGAGE CAPITAL LTD.**

-and-

**2011836 ONTARIO CORP. et al**

Applicant

Respondents

Court File No. CV-23-00710795-00CL

***ONTARIO***  
**SUPERIOR COURT OF JUSTICE**  
**COMMERCIAL LIST**

PROCEEDING COMMENCED AT  
TORONTO

**NOTICE OF MOTION**  
**Pursuant to Rule 15.0(2)**

FENGXI FANSEAY WANG  
Self-Represented Respondent

33 East Street, Suite 15E,  
Fuzhou, China, 350001  
Email: Fwang2025@icloud.com  
Tel: 0086-591-8750 1955

RCP-E 4C (May 1, 2016)