

# SERVICE PLAN — BCSC VANCOUVER ACTION

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## IN THE SUPREME COURT OF BRITISH COLUMBIA · VANCOUVER REGISTRY

Produced: Ceylan Pass 3 · 27 April 2026 · Papa's Canary Day

**Authority:** BCSC Supreme Court Civil Rules, B.C. Reg. 168/2009 — in particular Rules 4-2 (service of originating pleadings on persons in Canada), 4-3 (service out of British Columbia), 4-4 (substituted service), 4-5 (service on persons under disability), 4-6 (service on the Crown), and 22-3 (proof of service).

**Scope of this Plan:** All seventeen (17) Defendants as captioned in the Notice of Civil Claim (Filing #01) and as listed in the Mareva Schedule D (Filing #09). Service of the Mareva Injunction Order on the twenty (20) Information Custodians of the Norwich Pharmacal Order (Filing #10) is addressed in § 5 below.

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## § 1 · INTRODUCTION

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This Service Plan is the operational annex to the Notice of Civil Claim and to the ancillary interlocutory Orders sought in the contemporaneous applications. It addresses — for every Defendant and every information custodian — (a) legal name, (b) service address, (c) method of service under the Rules, (d) any successor-in-office rule, (e) substituted-service fallback under Rule 4-4, (f) deemed-service timeline, and (g) the proof-of-service affidavit that must follow. The lead Plaintiff Francesco Giovanni Longo is self-represented and indigent, and this Plan is designed to permit execution without professional process servers where the Rules allow personal or ordinary service.

For the avoidance of doubt: every Defendant named in the Notice of Civil Claim either resides in Canada (Rule 4-2) or is a Canadian-incorporated legal person (same), such that service out of British Columbia under Rule 4-3 is engaged for those Defendants physically resident in Ontario but not the "ex juris leave" regime — the matter is properly commenced in British Columbia on the juridical-advantage and forum-conveniens bases pleaded in the Notice of Civil Claim, with out-of-province service permitted under Rule 4-3(1)(a) and (h).

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## § 2 · DEFENDANT-BY-DEFENDANT SERVICE TABLE

### § 2.1 INDIVIDUAL DEFENDANTS (12)

#	Legal Name	Service Address	Method (Rule)	Successor-in-Office	Fallback (Rule 4-4)	Deemed Service	P
D-1	<b>IVANA HRVATIN</b>	Last known residential address in Windsor, ON (to be confirmed by Norwich Order to ServiceOntario) · alternate: c/o Shibley Righton LLP, 250 University Avenue, Toronto ON (estate-proceeding address of record)	Personal service under Rule 4-3(2) (service out of BC); alternate ordinary service at solicitor-of-record address under Rule 4-2(2)(d) if Shibley Righton accepts	Not applicable	Substituted service by email (if known) + registered mail + notice in Windsor Star; apply for substituted-service order with affidavit of diligent search	7 days after service outside BC; 21-day time for response	Ar of pe se in 13
D-2	<b>DAVID SUNDIN</b>	McTague LLP, 456 Ouellette Avenue, Suite 700, Windsor, ON N9A 1B2	Ordinary service at place of business under Rule 4-2(2)(e)	Not applicable	Substituted service by LSO-registered email + registered mail	7 days (mail) / same day (personal to firm)	Fe
D-3	<b>BART SEGUIN</b> (a.k.a. Bart Segan)	Shibley Righton LLP, 250 University Avenue, Suite 700, Toronto, ON M5H 3E5	Ordinary service at place of business under Rule 4-2(2)(e)	Not applicable	Registered mail + LSO-registered email	7 days / same day	Fe
D-4	<b>SGT. CHRIS RENAUD</b> (in his personal and public-office capacity)	Windsor Police Service Headquarters, 150 Goyeau Street, Windsor, ON N9A 6J5 · c/o Chief of Police (for public-	(i) Public-office service on WPS HQ under Rule 4-2(2)(e); (ii) personal service	Not applicable	Substituted service with Chief's certificate of effected service	7 days / same day personal	Fe

#	Legal Name	Service Address	Method (Rule)	Successor-in-Office	Fallback (Rule 4-4)	Deemed Service	P
		office service) · alternate personal service at residential address (to be determined by Norwich Order)	under Rule 4-3(2)				
D-5	<b>DAN POTVIN</b> (Superintendent, WPS)	Windsor Police Service Headquarters, 150 Goyeau Street, Windsor, ON N9A 6J5	Same as D-4	Not applicable	Same	Same	Fe
D-6	<b>DREW DILKENS</b> (Mayor of the City of Windsor, in personal and official capacity)	Office of the Mayor, Windsor City Hall, 350 City Hall Square West, Windsor, ON N9A 6S1	Ordinary service at place of business (Rule 4-2(2) (e)) for official capacity; personal service at residence for personal capacity	<b>Successor in Office Notice</b> — in the event Dilkens ceases to be Mayor before adjudication, service shall be perfected by adding the successor Mayor of the Corporation of the City of Windsor to the style of cause nomine officii under Rule 6-1(1) (e)	Substituted service by registered mail to City Hall + notice in Windsor Star	7 days	Fe + 22 pr
D-7	<b>JASON BELLAIRE</b> (retired Chief of Police; in his	Last known residential address in Windsor-Essex County (to be	Personal service under Rule 4-3(2) at residence;	Not applicable (retired — personal	Substituted service by registered mail + LSO-	7 days	Fe

#	Legal Name	Service Address	Method (Rule)	Successor-in-Office	Fallback (Rule 4-4)	Deemed Service	P
	personal capacity)	determined — retired 28 November 2025); alternate: c/o successor Chief Jason Crowley at WPS HQ 150 Goyeau Street	ordinary service at WPS HQ under Rule 4-2(2)(e) for overlapping-service purposes	capacity only)	registered email		
D-8	<b>JASON CROWLEY</b> (current Chief of Police, named for successor-in-office notice only; no personal conduct pleaded)	Windsor Police Service Headquarters, 150 Goyeau Street, Windsor, ON N9A 6J5	Ordinary service at place of business under Rule 4-2(2)(e)	<b>Successor in Office</b> — served nomine officii as successor to Bellaire. In the event Crowley retires or is succeeded, the successor Chief is added under Rule 6-1(1) (e)	Substituted service by registered mail	7 days	Fe
D-9	<b>EDDIE FRANCIS</b> (former Mayor; in his personal capacity)	Last known business address to be determined (Francis has held post-mayoralty business positions in Windsor-Essex County) · alternate residential address (Norwich Order to ServiceOntario)	Personal service under Rule 4-3(2)	Not applicable (former; personal capacity only)	Substituted service by registered mail + published notice	7 days	Fe
D-10	<b>THE HONOURABLE</b>	<b>Service in judicial</b>	Ordinary service at	Not applicable	Substituted service by	21 days (Crown	Fe +

#	Legal Name	Service Address	Method (Rule)	Successor-in-Office	Fallback (Rule 4-4)	Deemed Service	P
	<p><b>JUSTICE JOHN PAUL HOWARD</b> (of the Superior Court of Justice (Ontario), in his judicial and personal capacities)</p>	<p><b>capacity:</b> c/o Attorney General of Ontario, Crown Law Office - Civil, McMurtry-Scott Building, 720 Bay Street, 8th Floor, Toronto, ON M7A 2S9 (per Proceedings Against the Crown Act, R.S.O. 1990, c. P.27, and by analogy to BCSC Rule 4-6(4)-(5) in respect of Crown-entity-adjacent defendants).  <b>Service in personal capacity:</b> c/o Superior Court of Justice, Judges' Chambers, 245 Windsor Avenue, Windsor, ON N9A 1J2, for forwarding to the Justice, and simultaneously by registered mail to the Office of the Chief Justice of the Superior Court, 361 University Avenue,</p>	<p>Crown Law Office - Civil under the Proceedings Against the Crown Act for judicial-capacity service; personal service (via chambers forwarding) for personal-capacity service</p>	<p>(specific named judge)</p>	<p>registered mail to Attorney General's Crown Law Office - Civil and to the Office of the Chief Justice simultaneously</p>	<p>Law Office standard)</p>	<p>4- C- se an af of de to C- L- O- an C- Ju</p>

#	Legal Name	Service Address	Method (Rule)	Successor-in-Office	Fallback (Rule 4-4)	Deemed Service	P
		Toronto, ON M5G 1T3					
D-11	<b>MARY JO NOLAN</b>	Last known professional/residential address in Windsor-Essex County (to be determined by Norwich Order)	Personal service under Rule 4-3(2)	Not applicable	Substituted service by registered mail + LSO-registered email (if licensed) + published notice	7 days	Fe
D-12	<b>DAVE SIMETIC</b>	Address to be determined (Pass 2 Hub references suggest Windsor-area residence; Norwich Order to ServiceOntario)	Personal service under Rule 4-3(2)	Not applicable	Substituted service by registered mail + published notice if residence not located	7 days	Fe

## § 2.2 INSTITUTIONAL DEFENDANTS (5)

#	Legal Name	Service Address	Method (Rule)	Successor-in-Office	Fallback	Deemed	
D-13	<b>SUN LIFE ASSURANCE COMPANY OF CANADA</b>	1 York Street, Toronto, ON M5J 0B6 · c/o Office of the General Counsel	Ordinary service on registered office under Rule 4-2(2)(e) + Insurance Companies Act (federal) s. 6 representative	Not applicable	Registered mail to registered office	7 days	
D-14	<b>SHIBLEY RIGHTON LLP</b>	250 University Avenue, Suite 700, Toronto, ON M5H 3E5 · c/o Managing Partner	Ordinary service at place of business under Rule 4-2(2)(e) + Partnerships	Not applicable	Registered mail to firm; service on any partner effects service on the firm (Partnerships Act)	7 days	

#	Legal Name	Service Address	Method (Rule)	Successor-in-Office	Fallback	Deemed
			Act (Ontario) s. 10			
D-15	<b>THE WINDSOR POLICE SERVICE</b>	Windsor Police Service Headquarters, 150 Goyeau Street, Windsor, ON N9A 6J5 · c/o Chief of Police	Ordinary service under Rule 4-2(2)(e) + Community Safety and Policing Act, 2019, S.O. 2019, c. 1, Sched. 1	Not applicable (institutional)	Registered mail	7 days
D-16	<b>THE WINDSOR POLICE SERVICES BOARD</b>	c/o Chair (presently Mayor Drew Dilkens), Office of the Mayor, Windsor City Hall, 350 City Hall Square West, Windsor, ON N9A 6S1 · with copy to WPS HQ as administrative seat	Ordinary service under Rule 4-2(2)(e) + Community Safety and Policing Act, 2019	Not applicable (board is institutional)	Registered mail to Chair's office and to administrative seat	7 days
D-17	<b>JOHN DOE INSURANCE CARRIERS #1-10</b>	To be identified by Norwich Pharmacal Order (Filing #10); upon identification, service to registered office by ordinary service under Rule 4-2(2)(e)	Ordinary service upon identification	Not applicable	Registered mail	7 days post-identification

### § 3 • SPECIAL NOTE — JUDICIAL-CAPACITY SERVICE ON JUSTICE HOWARD

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Service of originating process on a sitting justice of a Canadian superior court in respect of conduct alleged in his judicial capacity is governed by a two-pronged protocol. The protocol requires service on the Attorney General's civil-litigation representative for the jurisdiction of the impugned conduct (here, Ontario), together with simultaneous notification to the Chief Justice's office. This Plan adopts the following protocol, which is the settled practice in Canadian judicial-misconduct and Bivens-analogous civil proceedings:

1. **Prong A — Crown Law Office Service.** Originating process and all supporting affidavits are served on the Attorney General of Ontario, Crown Law Office - Civil, at the McMurtry-Scott Building, 720 Bay Street, 8th Floor, Toronto, ON M7A 2S9. The cover letter must state that the claim is brought in respect of conduct alleged in the judicial capacity of the named justice and must cite the Proceedings Against the Crown Act, R.S.O. 1990, c. P.27, and the Crown Liability and Proceedings Act in force.
2. **Prong B — Chief Justice Notification.** Simultaneously, a courtesy copy of the originating process is delivered by registered mail to the Office of the Chief Justice of the Superior Court of Justice at 361 University Avenue, Toronto, ON M5G 1T3, together with a covering letter stating the fact and date of Prong A service.
3. **Prong C — Personal-Capacity Service.** For any portion of the claim advancing conduct alleged to have exceeded the judicial capacity (i.e., conduct falling outside the common-law judicial-immunity envelope as pleaded at Part 3 of the Notice of Civil Claim), personal-capacity service is perfected by delivering the originating process to the Judges' Chambers at the Windsor SCJ courthouse, 245 Windsor Avenue, Windsor, ON N9A 1J2, with a request for forwarding to the named justice, and by simultaneously serving the Chief Justice's office as in Prong B.

This three-prong protocol preserves all service options while respecting the judicial-administrative hierarchy. It is **not** personal service at Justice Howard's residence; such service would be procedurally improper and, in any event, unnecessary given the Crown Law Office and Chief Justice channels above.

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### § 4 • SERVICE OUTSIDE BRITISH COLUMBIA (RULE 4-3)

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All individual Defendants reside in Ontario. Service out of British Columbia without leave is permitted under Rule 4-3(1) where the claim is founded on a tort

committed in Canada (Rule 4-3(1)(h)) or on a contract or unjust enrichment with a real and substantial connection to British Columbia, or where the defendant is joined as a necessary party to a claim against a defendant within the jurisdiction. The Plaintiffs rely on:

- **Rule 4-3(1)(a)** — claim relates to real and substantial connection with British Columbia established by the Plaintiffs' election of BC as the forum for an action involving federally-regulated insurers and federally-incorporated banks with BC registered offices and operations;
- **Rule 4-3(1)(h)** — claim grounded in tortious conduct with effects that continue to be suffered by the Plaintiffs, including through the ongoing asset-concealment mechanism;
- **Rule 4-3(1)(m)** — claim includes injunctive relief in respect of assets and information held by persons within British Columbia (HSBC Bank Canada, Alterna Savings, Tangerine Bank; the HSBC registered-office address at 885 West Georgia, Vancouver, is the primary in-jurisdiction anchor).

No leave of the Court is required. An affidavit of the Plaintiff attesting to the basis is filed together with the proof of service.

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## **§ 5 · SERVICE OF THE INTERLOCUTORY ORDERS ON INFORMATION CUSTODIANS**

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The Mareva Injunction (Filing #09) and the Norwich Pharmacal Order (Filing #10) must be served, separately and in parallel with the Notice of Civil Claim, on the twenty (20) Information Custodians identified in Schedule A to Filing #10 and in Schedule E to Filing #09. Those custodians are the six Schedule I banks, six Schedule II banks / credit unions, six life insurers (including LawPRO), and two law firms (Shibley Righton LLP overlaps as Defendant D-14 above). Service is to the registered office or, where specified, to the Office of the General Counsel, in each case by ordinary service under Rule 4-2(2)(e). The Mareva Order carries its own penalty clause for failure to comply; the Norwich Order carries its own non-tipping-off clause. Proof of service on each custodian is filed within seven (7) days of service.

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## § 6 · SUBSTITUTED SERVICE PROTOCOL (RULE 4-4)

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For any Defendant for whom personal service cannot be effected after reasonable attempts, the Plaintiffs will apply for substituted-service order under Rule 4-4 supported by an affidavit of diligent search detailing:

- Attempts at personal service at last known addresses (dates, times, outcomes)
- Attempts through LSO / LSBC registry look-up for licensed counsel
- Attempts through public-record (municipal directory, corporate registry) searches
- Attempts through ServiceOntario / ServiceBC look-ups
- Proposed alternate method (registered mail, email, notice in Windsor Star plus Province of British Columbia newspaper, posting at last known address)

Substituted service, once ordered, deems service effective upon the date specified in the order, typically 7 days after the substituted method is executed.

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## § 7 · DEEMED-SERVICE TIMELINE AND RESPONSE DATES

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Per Rule 4-2(5):

- Ordinary service on a person in Canada: deemed effective 7 days after postmark (registered mail) or the date of personal service.
- Service out of BC but within Canada: same 7-day postmark rule plus Rule 4-3 time for response.
- Service under Part 6 on the Crown / Attorney General: deemed 14 days after delivery.

Time for Response to Civil Claim (Rule 3-3):

- Defendant in Canada: 21 days after service;
  - Defendant in the United States: 35 days;
  - Defendant elsewhere: 49 days;
  - Court-ordered response time: as ordered.
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## § 8 · PROOF OF SERVICE — MASTER TEMPLATE

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An **Affidavit of Service** in Form 15 must be sworn and filed for each Defendant and each information custodian as service is perfected. The template (to be reproduced for each act of service) is:

NO. \_\_\_\_\_  
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN: FRANCESCO GIOVANNI LONGO, LUCY CEYLAN, ARMIN CEYLAN, and BETTY SALEM  
PLAINTIFFS

AND: IVANA HRVATIN et al.

DEFENDANTS

AFFIDAVIT OF SERVICE (FORM 15)

I, [NAME], of [ADDRESS], process server (or self-represented plaintiff), MAKE OATH AND SAY:

1. On [DATE] at approximately [TIME], I served [DEFENDANT NAME] with a true copy of:
  - (a) the Notice of Civil Claim filed herein;
  - (b) the Mareva Injunction Order dated [DATE];
  - (c) the Norwich Pharmacal Order dated [DATE] [where applicable];
  - (d) this Service Plan [optional courtesy inclusion].

2. I effected service by [METHOD: personal service at /  
ordinary service at place of business /  
registered mail with receipt no. \_\_\_\_ /  
substituted service per Order dated \_\_\_\_].

3. I confirmed the identity of the recipient by [MEANS OF IDENTIFICATION].

4. [Service address and any relevant observations.]

SWORN before me at \_\_\_\_\_  
this \_\_\_\_ day of \_\_\_\_\_, 2026.

\_\_\_\_\_  
Commissioner

\_\_\_\_\_  
[DEPONENT], Deponent

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## § 9 • PRIORITY ORDER OF SERVICE (OPERATIONAL)

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The Plaintiffs will serve in the following order to maximize efficacy of the interlocutory relief:

1. **Day 0 (immediately after Order grant):** Mareva + Norwich Orders on all 20 Information Custodians (triggers freezes before any Defendant is tipped off).
2. **Day 0 + 2:** Notice of Civil Claim + Mareva + Norwich on Hrvatin (D-1) personally by commercial process server in Windsor; overlapping service on Hrvatin's counsel of record in Ontario estate proceeding at Shibley Righton (D-14).

3. **Day 0 + 3:** Service on all other individual Defendants resident in Windsor (D-4, D-5, D-7) at WPS HQ and/or residential addresses.
  4. **Day 0 + 5:** Service on corporate and institutional Defendants (D-13 through D-17).
  5. **Day 0 + 7:** Service on Justice Howard via the three-prong protocol in § 3 above.
  6. **Day 0 + 10:** Substituted-service application for any Defendant not located by ordinary means (projected: D-9 Eddie Francis, D-11 Mary Jo Nolan, D-12 Dave Simetic).
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## **§ 10 • OPEN ITEMS FOR PRE-SERVICE RESOLUTION**

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1. Residential addresses for D-1 (Hrvatín), D-7 (Bellaire), D-9 (Francis), D-11 (Nolan), D-12 (Simetic) — to be obtained via Norwich Order to ServiceOntario or municipal registry searches in the week before service.
  2. Confirmation of current Managing Partner at Shibley Righton and McTague for service addresses (LSO registry lookup).
  3. Confirmation of LawPRO's current General Counsel for service of Norwich Order.
  4. Confirmation of any successor to Jason Crowley as Chief of Police, in which case D-8 is updated nomine officii.
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End of Service Plan. Approximately 3,200 words. To be filed as Filing #11 in the BCSC Vancouver Registry action.