

Court File No. CL-26-00000202-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

ROYAL BANK OF CANADA

Applicant

and

**ROADX EXPRESS LTD., 10656925 CANADA INC., BLUE OCEAN
FREIGHT INC., DXB LOGISTICS INC., GTR EXPRESS INC., and
SAMREET KAUR also known as SAMREET KAUR KAHLON**

Respondents

AFFIDAVIT OF SAMREET KAUR KAHLON

I, Samreet Kaur Kahlon, of the City of Brampton, in the Province of Ontario, AFFIRM:


1. I am one of the Respondents in this proceeding, and I am a director of the corporate Respondents and, as such, have personal knowledge of the following matters except where I indicate that such knowledge is based on information or belief, in which case I have stated the source of my information and believe it to be true.
2. The respondents do not intend to oppose the appointment of a Receiver, as requested in the Applicant's Notice of Motion.
3. The circumstances that have led to this point are deeply upsetting to me. I built Roadx Express Ltd. ("Roadx") from nothing into a successful transportation company and related businesses in the first three years of operating. In the past two years, the transportation industry in Canada has become extremely challenging. Roadx is one of many transportation businesses that started in good times (around 2021) that are now closing down.

4. We did everything we could to turn keep the business afloat, find a way to refinance the companies' debts, and keep operating until the transportation business environment improved.
5. Since early April 2026, we were in discussions with TD Bank's GTA West Commercial Banking Centre to obtain new credit facilities to allow us to pay out the RBC debts and an operating line to see the business through these difficult times. It is clear now that this refinancing will not proceed, and a receivership appears to be inevitable.
6. We will cooperate as necessary to assist our creditors in recovering assets and amounts owed to them.
7. Although I may seek an opportunity to respond to other evidence put forward by the Applicant, at present the only evidence I wish to respond to is the Supplementary Affidavit of Ruston Martin, sworn May 25, 2026.
8. Mr. Martin states that Mukul Manchanda, a representative of the proposed Receiver, attended at Roadx's registered head office in Georgetown, Ontario this past weekend, and saw that the truck yard was empty and the office was empty. This is true.
9. As Roadx's financial pressures mounted over the past several months, we fell behind on rent. After missing three months of rent payments, in early May our landlord demanded payment of all overdue rent at once. I was very concerned that the landlord would lock us out and distrain Roadx's equipment.
10. Because the Royal Bank of Canada has frozen our access to credit, we had no means of paying the rent or making a deposit to lease another truck yard.
11. In addition, in the past few weeks, bailiffs have been attending at our office on behalf of other creditors. 11 trailers and 2 trucks have been seized. These bailiffs have been highly unprofessional, intimidating our drivers, spreading rumours of Roadx already being bankrupt, and offering cash payments in exchange for information about where their clients' other equipment was located.

- 12. In an effort to keep as many trucks and trailers available as possible for taking on work, and wanting to avoid the added cost of recovering equipment from the landlord if a lockout went ahead, I arranged for the trucks and trailers to move out from our truck yard. I also told our office staff that they should work from home, at least temporarily (we did not remove any signage, that must have been done by the landlord). These steps also meant that the bailiffs who kept coming to our site would no longer be able to harass our drivers and employees.

- 13. I understand that these actions could be perceived negatively by creditors. I wish to assure the court this was a good faith attempt to keep the business going as long as possible, and nothing else. We will cooperate in locating and identifying all equipment under Roadx's ownership, possession or control.

AFFIRMED remotely at the City of Toronto, in the Province of Ontario, before me on May 28, 2026 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:

 FBFA84ED07ED4FE...
 Commissioner for Taking Affidavits
 (or as may be)



Signed by:

 B8A48F5CDCC84CE...
SAMREET KAUR KAHLON

ROYAL BANK OF CANADA
Applicant

-and- ROADX EXPRESS LTD. et al.
Respondents

Court File No. CL-26-00000202-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

PROCEEDING COMMENCED AT
TORONTO

AFFIDAVIT OF SAMREET KAUR KAHLON

CP LLP

Barristers and Solicitors
77 King Street West
TD North Tower
Suite 700, P.O. Box 118
Toronto ON M5K1G8

Alastair J. McNish (LSO# 52325S)
amcnish@cpllp.com

Tel: (416) 368-6200

Fax: (416) 368-0300

Lawyers for the Respondents