

ONTARIO
SUPERIOR COURT OF JUSTICE
(Commercial List)

THE HONOURABLE)

THURSDAY, THE

JUSTICE)

NEWBOLD

)

15TH DAY OF DECEMBER, 2016

BETWEEN:

**BANNERS BROKER INTERNATIONAL LIMITED and
STELLAR POINT, INC., by their receiver MSI SPERGEL INC.**

Plaintiffs

- and -

**RAJIV DIXIT, KULDIP JOSUN, DIXIT HOLDINGS INC.,
DIXIT CONSORTIUM INC., DREAMSCAPE VENTURES LTD.,
WORLD WEB MEDIA INC., and REAL PROFIT LIMITED**

Defendants

ORDER

(Freezing Bank Accounts)

NOTICE

If you, the Defendant, disobey this order you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized. You are entitled to apply on at least twenty-four (24) hours notice to the Plaintiff, for an order granting you sufficient funds for ordinary living expenses and legal advice and representation.

Any other person who knows of this order and does anything which helps or permits the Defendant to breach the terms of this Order may also be held to be in contempt of court and may be imprisoned, fined or have their assets seized.

THIS MOTION, made without notice by the Plaintiff, msi Spergel inc. in its capacity as receiver (in such capacity, the "**Receiver**") of Banners Broker International Limited ("**BBIL**") and Stellar Point Inc. ("**Stellar Point**"), for an interim Order in the form of a *Mareva* injunction restraining the defendant, Kuldip Josun ("**Josun**"), and Tara Reeves ("**Reeves**") from dissipating

certain of their assets and other relief, was heard this day at the Court House, 330 University Avenue, Toronto, Ontario.

ON READING the Motion Record of the Receiver, on hearing the submissions of counsel for the Receiver, and on noting the undertaking of the Receiver to abide by any Order this Court may make concerning damages arising from the granting and enforcement of this Order:

Freezing Order: Specific Accounts

1. **THIS COURT ORDERS** that Josun and Reeves, and their servants, employees, agents, assigns, officers, directors and anyone else acting on their behalf or in conjunction with them, or any of them, and any and all persons with notice of this injunction, are restrained from directly or indirectly, by any means whatsoever:

- (a) selling, removing, dissipating, alienating, transferring, assigning, encumbering, or similarly dealing with the assets and accounts listed and/or referenced in **Schedule "A"** hereto ("**Reeves Bank Accounts**");
- (b) instructing, requesting, counselling, demanding, or encouraging any other person to do so; and
- (c) facilitating, assisting in, aiding, abetting, or participating in any acts the effect of which is to do so.

2. **THIS COURT ORDERS** that paragraph 1 applies to the Reeves Bank Accounts regardless of whether or not the Reeves Bank Accounts are held in Josun or Reeves's own names or whether they are solely or jointly owned.

Ordinary Living Expenses

3. **THIS COURT ORDERS** that Josun or Reeves may apply for an order, on at least twenty-four (24) hours notice to the Receiver, specifying the amount of funds which Josun or Reeves are entitled to spend on ordinary living expenses and legal advice and representation.

Third Parties

4. **THIS COURT ORDERS** Canadian Imperial Bank of Commerce ("**CIBC**") and the Toronto-Dominion Bank ("**TD Bank**") to forthwith freeze and prevent any removal or transfer of monies or assets from the Reeves Bank Accounts until further Order of the Court

5. **THIS COURT ORDERS** that CIBC and TD Bank forthwith disclose and deliver up to the Receiver any and all records held by them concerning the Reeves Bank Accounts.

Variation, Discharge or Extension of Order


6. **THIS COURT ORDERS** that anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this order, on four (4) days notice to the Receiver.

7. **THIS COURT ORDERS** that the parties shall attend before this Court on December 20, 2016 at 10:00 AM for the hearing of a motion by the Receiver for the continuation of this Order, failing which this Order will terminate.



ENTERED AT / INSCRIT À TORONTO
ON / BOOK NO:
LE / DANS LE REGISTRE NO:

DEC 15 2016

PER / PAR: 

SCHEDULE "A"

Reeves Bank Accounts:

BANK	BRANCH ADDRESS	ACCOUNT HOLDER	ACCOUNT NO.	ADDITIONAL DETAILS
CIBC	Unknown	Tara Josun	Unknown	Bank account relating to FI Reference [REDACTED]
TD Bank	1585 Mississauga Valley Blvd. Mississauga, ON L5A 3W9	Unknown	[REDACTED]	

BANNERS BROKER INTERNATIONAL LTD. by its receiver,
MSI SPERGEL INC., et al
Plaintiffs

and RAJIV DIXIT et al.
Defendants

Court File No. CV-16-11413-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)
PROCEEDING COMMENCED AT
TORONTO

FREEZING ORDER

Cassels Brock & Blackwell LLP
2100 Scotia Plaza
40 King Street West
Toronto, ON M5H 3C2

David S. Ward LSUC#: 33541W
Tel: 416.869.5960
Fax: 416.640.3154
dward@casselsbrock.com

Erin Craddock LSUC#: 62828J
Tel: 416.860.6480
Fax: 416.642.71294.9324
ecraddock@casselsbrock.com

Lawyers for msi Spergel inc., in its capacity as Receiver of
Banner Broker International Limited and Stellar Point Inc.