

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

B E T W E E N:

ROYAL BANK OF CANADA

Applicant

- and -

TECHCITY CANADA INC. AND 1000229443 ONTARIO INC.

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. C.43, AS AMENDED**

REPLY APPLICATION RECORD
(returnable on a date to be scheduled)

August 21, 2026

AIRD & BERLIS LLP
Brookfield Place
181 Bay Street, Suite 1800
Toronto, ON M5J 2T9

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Lawyers for Royal Bank of Canada

TO: SERVICE LIST

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Exhibits

1. Email correspondence between Amjad Shahid and David Kennedy

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TAB A

Court File No. CL-26-00000205-0000

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**REPLY AFFIDAVIT OF DAVID KENNEDY
(sworn August 20, 2026)**

I, **DAVID KENNEDY**, of the City of Toronto, in the Province of Ontario, **MAKE OATH
AND SAY AS FOLLOWS:**

1. I am a Senior Manager in the Special Loans & Advisory Services Department of Royal Bank of Canada (“**RBC**”), and, as such, have personal knowledge of the matters to which I hereinafter depose.

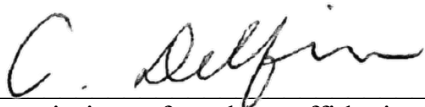
2. This affidavit (this “**Reply Affidavit**”), which is sworn in support of the pending receivership application against TechCity Canada Inc. and 1000229443 Ontario Inc. (the “**Receivership Application**”), is sworn further to my affidavit sworn April 22, 2026 (the “**Original Affidavit**”) and in reply to the affidavit of Amjad Shahid (“**Mr. Shahid**”) sworn on or about July 13, 2026 (the “**Shahid Affidavit**”).

3. This Reply Affidavit is further limited in scope in that it addresses only the evidence in the Shahid Affidavit that, in my view, could be reasonably construed as relevant to the adjudication of the Receivership Application. Accordingly, to the extent this Reply Affidavit does not reply to most of the statements in the Shahid Affidavit, such silence should not be interpreted as my agreement with Mr. Shahid on these points. Without limiting the generality of the foregoing, I deny having ever made the statements at paragraphs 59 and 60 of the Shahid Affidavit.

4. Exhibit "H" to the Shahid Affidavit contains emails that Mr. Shahid sent to me in June 2026 after I swore the Original Affidavit in April 2026. These emails belong to a lengthier email chain, which I commenced in January 2026, and which Mr. Shahid omits from the Shahid Affidavit. Attached as **Exhibit "1"** to this Affidavit is a copy of this full email chain (the "**Full Email Chain**").

5. The Full Email Chain begins with my request of Mr. Shahid in January 2026 to provide 12 different reporting items to me. All 12 of these reporting items from January 2026 remain outstanding as of the time of swearing this Reply Affidavit in August 2026.

SWORN by David Kennedy at)
 the City of Toronto, in the Province of)
 Ontario, before me on this 20th day of)
 August, 2026 in accordance with)
 O. Reg. 431/20, Administering Oath)
 or Declaration Remotely.)


 Commissioner for taking affidavits, etc.
 (Cristian Delfino, LSO No. 87202N)


DAVID KENNEDY

This is Exhibit “1” referred to in the Affidavit of David Kennedy sworn before me at Toronto,
Ontario, this 20th day of August, 2026



Commissioner for Taking Affidavits

Jeremy Nemers

Subject: FW: TECHCITY CANADA INC. and 1000229443 ONTARIO INC.

From: TECHCITY KENNEDY <techcitykennedy@gmail.com>

Sent: Monday, July 6, 2026 5:09 PM

To: Kennedy, David R <david.r.kennedy@rbc.com>

Subject: Re: FW: TECHCITY CANADA INC. and 1000229443 ONTARIO INC.

[External]/[Externe]

Hello David,

I'm trying to grab Your attention to 1000229443 Ontario Inc and Techcity Canada . I'm Doing my Best to Keep up the Mortgage,Line of credit and credit card Payments Up to date but You are not cooperating , You Keep processing random payments from the Mortgage Account, according to my calculations.The Mortgage is Up to date , But the account shows. Negative . There is \$17000 available see stretched screenshots.

Techcity Canada INC . There is money in the Techcity account to cover up Monthly Minimum Payments on Visa and line of credit card.When i try to transfer funds i can't when i go to the branch they say contact your Account Manager . Mr Avi Chattani kept taking thousands of Dollars from me when I refused to pay and sign more and more security documents and refused meetings in parking lots. I was pushed over to you . When we had a meeting you sounded very promising. It seems like you were there to assist in the difficult time during robbery but in reality you did the opposite. I feel that RBC is being very unreasonable with me. I will forward this note to my lawyer so that he is in the loop.

Amjad

On Wed, Jun 24, 2026 at 7:55 PM TECHCITY KENNEDY <techcitykennedy@gmail.com> wrote:

Hello David, Techcity Canada survived . Covid . Struggling Economy and All the challenges including unfair treatment by RBC and people representing RBC . We are still trying our best to maintain Card Loc and Mortgage . We are trying to survive the robbery . As per My record . There is no payment 30 day or more late ... I'm trying to understand how much the Mortgage Payment is and when it is Due every month . I need to pay mortgage and Property tax instalments . Please fix the Mortgage account and take Mortgage payments on the 16th . Line of credit and Visa interest Payments to 5th of every month

A

On Mon, Jun 15, 2026 at 5:46 PM TECHCITY KENNEDY <techcitykennedy@gmail.com> wrote:

Hello , Can You fix the Mortgage Account , You took 6210.20 on June 03 . There is enough in the Account to Cover May -June 16 payment . Once you process the overdue amount , i will check and deposit . Thank You . Amjad

On Tue, Jun 2, 2026 at 6:35 PM TECHCITY KENNEDY <techcitykennedy@gmail.com> wrote:

Hello David,

I thought you were my point of contact until this loan was paid off to RBC. I have been trying to make minimum payment into the credit card, line of credit and mortgage. Not sure why the

mortgage account says it's negative since april 16 2026.i will make sure there is enough funds in the accounts for you to process may 2026 outstanding mortgage payment. I will also ensure the techcity account has enough funds to process the line of credit interest payment and minimum payment for the visa.

Thank you
Amjad

On Thu, May 14, 2026 at 1:31 PM TECHCITY KENNEDY <techcitykennedy@gmail.com> wrote:

Hello David . Can You please answer My question . Why the account shows that the mortgage is over due when It was paid . Also can you pls send me year end Mortgage with the balance and interest please aid each year . 2023 . 2024 . 2025 . Please i need this today ...

On Tue, May 12, 2026 at 8:02 PM TECHCITY KENNEDY <techcitykennedy@gmail.com> wrote:

Hello David,
We need mortgage statement with interest details for 2023, 2024,2025 year. Also why the account shows monthly payment is due on april 16 2026 when the mortgage is already paid.

Thanks
Amjad

On Mon, Feb 23, 2026 at 5:48 PM TECHCITY KENNEDY <techcitykennedy@gmail.com> wrote:

Hello David

Mortgage payment is in the account please process. Renovations are completed ,a few tenants will be moving in this month, as of march first. we are working on finding more suitable Client to rent out the basement unit as well .

not much change on the techicity Retail side , i will keep you posted . A

On Tue, Feb 3, 2026 at 3:44 PM Kennedy, David R <david.r.kennedy@rbc.com> wrote:

Amjad, thank you for your email. With respect to the loan payment on the 1000229443 ONTARIO INC., we are looking into it and will fix the error. It looks like they took the arrears payment and the interest portion of the payment was not back-dated to the day it was due. They are working on fixing this now.

Sorry for the inconvenience this has caused.

David R. Kennedy | RBC Royal Bank | **Royal Bank of Canada** | 20 King Street West, 2nd Floor, Toronto, Ontario, M5H 1C4

David R. Kennedy, Senior Manager, Special Loans & Advisory Services | RBC | 416-974-5825

From: TECHCITY KENNEDY <techcitykennedy@gmail.com>

Sent: Tuesday, February 3, 2026 3:11 PM

To: Kennedy, David R <david.r.kennedy@rbc.com>

Subject: Re: FW: TECHCITY CANADA INC. and 1000229443 ONTARIO INC.

[External]/[Externe]

Hello David . We are trying our best to increase rental income. You have not looked into the 20623 Mortgages issue for January 2026 . The account is still in minus. Instead you keep sending the list of documents. When I already indicted that we intend to pay off the RBC loan before or by the next renewal. We have already signed off too many unnecessary Document regarding this loan. Techcity Canada has no money and insurance is taking forever. Once I have further update I will reach out to you. If you are looking for Techcity Documents please reach out to Avi . Thanks

On Tue, Feb 3, 2026 at 1:40 PM Kennedy, David R <david.r.kennedy@rbc.com> wrote:

Hello Amjad. We are waiting on you to provide the below highlighted information and some indication on your progress towards gathering the rest of the information on the list. For the Bank to complete its initial assessment, we required the information.

Please provide some time lines as to when you will be sending us the below information.

Regards,

David R. Kennedy | RBC Royal Bank | **Royal Bank of Canada** | [20 King Street West, 2nd Floor](#), Toronto, Ontario, M5H 1C4

David R. Kennedy, Senior Manager, Special Loans & Advisory Services | RBC | 416-974-5825

From: Kennedy, David R

Sent: Tuesday, January 20, 2026 9:42 AM

To: 'TEHCITY KENNEDY' <techcitykennedy@gmail.com>

Cc: 'Abidashahid1983@hotmail.com' <Abidashahid1983@hotmail.com>

Subject: TECHCITY CANADA INC. and 1000229443 ONTARIO INC.

Amjad, it was a pleasure to meet you yesterday at Techcity. Please to see you have a new tenant lined up for the 2nd floor space.

As per our discussions, we will require the following items, within the time frame noted, listed below to commence our initial review and assessment:

1. CRA "Overview reports" for both companies – by January 24th
2. Final Property tax statement for [1274 Kennedy Road](#) and evidence of payment of all property taxes by January 24th
3. Accountant prepared financial statements for both Techcity and 1000229443 ONTARIO INC. as at December 31, 2025, by February 10th.
4. Combined FS as at Dec. 31, 2025 for Techcity Canada Inc and 1000229443 ONTARIO INC., by February 10th

5. Forecast to Dec. 31, 2026 for Techcity and 1000229443 including combined., by February 10th
6. Copy of the new lease agreement on the [1274 Kennedy Road](#) and details of payments received to date and rents received to date, by January 24th
7. Expected date of occupancy for the new tenant, by January 24th
8. Current detailed listing of inventory on hand including by SKU #, cost per SKU # and extended cost based on number of units on hand, by January 24
9. Full copy of the insurance policy, by January 24
10. Details of claims submitted, and amounts paid to date and expected additional recoveries, if any, as a result of the burglary event, by January 24.
11. Please share your communications with the insurer for our records, by January 24.
12. Details of your plans to bring the HASCAP loan up to date, current 78 days in arrears, by January 24.

Amjad, please review the above list, and call me if you have any questions. Please reach out to your external accountant for assistance for item# 1 and to discuss items 3, 4 and 5 in terms of ability to deliver by February 10th as outlined. If additional time is required on those items, we can have a conversation on that matter.

Regards,

David R. Kennedy | RBC Royal Bank | **Royal Bank of Canada** | [20 King Street West, 2nd Floor](#), Toronto, Ontario, M5H 1C4

David R. Kennedy, Senior Manager, Special Loans & Advisory Services | RBC | 416-974-5825

If you received this email in error, please advise the sender (by return email or otherwise) immediately. You have consented to receive the attached electronically at the above-noted email address; please retain a copy of this confirmation for future reference.

Si vous recevez ce courriel par erreur, veuillez en aviser l'expéditeur immédiatement, par retour de courriel ou par un autre moyen. Vous avez accepté de recevoir le(s) document(s) ci-joint(s) par voie électronique à l'adresse courriel indiquée ci-dessus; veuillez conserver une copie de cette confirmation pour les fins de référence future.

If you received this email in error, please advise the sender (by return email or otherwise) immediately. You have consented to receive the attached electronically at the above-noted email address; please retain a copy of this confirmation for future reference.

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Proceedings commenced at Toronto

**REPLY AFFIDAVIT OF DAVID KENNEDY
(sworn August 20, 2026)**

AIRD & BERLIS LLP

Barristers and Solicitors

Brookfield Place

181 Bay Street, Suite 1800

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Lawyers for Royal Bank of Canada.

TAB B

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SERVICE LIST
(current as of June 18, 2026)

TO:	AIRD & BERLIS LLP Brookfield Place 181 Bay Street, Suite 1800 Toronto, ON M5J 2T9 Jeremy Nemers (LSO # 66410Q) Tel: (416) 865-7724 Email: jnemers@airdberlis.com Cristian Delfino (LSO # 87202N) Tel: (416) 865-7748 Email: cdelfino@airdberlis.com <i>Lawyers for the Applicant</i>
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AND TO:	JEROME H. STANLEIGH Barrister and Solicitor 5255 Yonge Street, Suite 800 Toronto, ON M2N 6P4 Tel: (416) 924-0151 Email: jerome.lawoffice@stanleigh.com <i>Lawyer for the Respondents</i>
AND TO:	MSI SPERGEL INC. 200 Yorkland Boulevard, Suite 1100 Toronto, ON M5J 5C1 Mukul Manchanda Tel: (416)-498-4314 Email: mmanchanda@spergel.ca <i>Proposed Receiver</i>
AND TO:	KENNEDY GATEWAY INC. 11 Maryvale Crescent Richmond Hill, ON L4C 6P6 <i>Second Mortgagee</i>
AND TO:	MERCEDES-BENZ FINANCIAL 2680 Matheson Boulevard East, Suite 500 Mississauga, ON L4W 0A5 <i>PPSA Creditor</i>
AND TO:	OFFICE OF THE SUPERINTENDENT OF BANKRUPTCY CANADA 151 Yonge Street, 4th Floor Toronto, ON M5C 2W7 Email: osbservice-bsfservice@ised-isde.gc.ca
AND TO:	ATTORNEY GENERAL OF CANADA Department of Justice of Canada Ontario Regional Office, Tax Law Section 120 Adelaide Street West, Suite 400 Toronto, ON M5H 1T1 Email: AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca

AND TO:	HIS MAJESTY THE KING IN RIGHT OF CANADA as represented by Ministry of Finance Legal Services Branch Revenue Collections Branch – Insolvency Unit 33 King Street West, 6 th Floor Oshawa, ON L1H 8H5 Email: insolvency.unit@ontario.ca
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EMAIL SERVICE LIST

jnemers@airdberlis.com; cdelfino@airdberlis.com; jerome.lawoffice@stanleigh.com;
mmanchanda@spergel.ca; osbservice-bsfservice@ised-isde.gc.ca; AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca; insolvency.unit@ontario.ca

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