

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

B E T W E E N:

ROYAL BANK OF CANADA

Applicant

- and -

INTERNATIONAL TRUCKING INCORPORATED and 1000563626 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**

**AFFIDAVIT OF ADAM HAUGH
(sworn May 20, 2026)**

I, Adam Haugh, of the City of Mississauga, in the Province of Ontario, **MAKE OATH
AND SAY AS FOLLOWS:**

1. Royal Bank of Canada (“**RBC**”) is a secured creditor of the respondents, International Trucking Incorporated (“**ITI**”) and 1000563626 Ontario Inc. (“**626**” and together with ITI, the “**Debtors**”).
2. I am a Director in the Special Loans and Advisory Services Group at RBC and am one of the people responsible for managing the Debtors’ accounts and credit facilities.
3. I therefore have personal knowledge of the matters to which I hereinafter depose. If I do not have personal knowledge of information contained in this affidavit, then I have stated the source of my information. and in all such cases, I believe that information to be true.

UPDATE SINCE THE ORIGINAL AFFIDAVIT

4. This Affidavit is sworn in support of the pending receivership application against the Debtors, and is sworn further to my Affidavit sworn January 28, 2026 (the “**Original Affidavit**”). All capitalized terms herein not defined shall have the meaning set out in the Original Affidavit.
5. I swear this affidavit in support of an application brought by RBC for an order appointing msi Spergel Inc. (“**Spergel**”) as receiver of all the Debtors’ assets, undertakings, and properties acquired for, or used, in relation to the business carried on by the Debtors, and all proceeds thereof (collectively, the “**Property**”).
6. Following the Original Affidavit, the parties timetabled the return date of this hearing at a Court attendance on April 1, 2026 (the “**Original Return Date**”). Attached hereto as **Exhibit “A”** is a copy of the Endorsement setting out the timetable and the joint aide memoire served in advance of the hearing.
7. Following the Original Return Date, the Debtors have advanced a series of offers to RBC, the terms of each of which RBC has declined.
8. As of May 20, 2026, the Indebtedness totals \$10,753,010.45: (i) \$5,392,368.19 is owing by ITI under the ITI Credit Agreements, and (ii) \$5,360,642.26 is owing by 626 under the 626 Credit Agreement.
9. As of the date of this affidavit, the Indebtedness remains outstanding.
10. I make this affidavit in support of RBC’s application to appoint Spergel as Receiver.

Affirmed remotely by video conference on May 20, 2026 in the City of Toronto, in the Province of Ontario, with the affiant before me in the City of Toronto, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely.



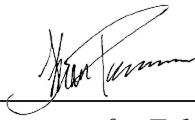
DocuSigned by:
Shawn Parsons
3D90420171CB499...

Commissioner for Taking Affidavits

Signed by:
Adam Haugh
FB56A9E7AE114DA...

ADAM HAUGH

This is Exhibit "A" referred to in the Affidavit of Adam Haugh
sworn before me, this 20th day of May, 2026.



Commissioner for Taking Affidavits



ONTARIO SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

COUNSEL/ENDORSEMENT SLIP

COURT FILE NO.: CL-26-00000101-0000

DATE: April 1, 2026

NO. ON LIST: 3

TITLE OF PROCEEDING:

ROYAL BANK OF CANADA v. INTERNATIONAL TRUCKING INCORPORATED et al

BEFORE: JUSTICE SEAN DUNPHY

PARTICIPANT INFORMATION

For Plaintiff, Applicant, Moving Party:

Name of Person Appearing	Name of Party	Contact Info
Shaun Parsons	Applicant	sparsons@airdberlis.com

For Defendant, Respondent, Responding Party:

Name of Person Appearing	Name of Party	Contact Info
Salman Rana	Respondent	srana@wrayjames.com


For Other, Self-Represented:

Name of Person Appearing	Name of Party	Contact Info

ENDORSEMENT OF JUSTICE SEAN DUNPHY:

- [1] The Case Timetable jointly worked out by the parties as set forth in the Aide Memoire is approved. The motion shall be heard on Thursday May 21, 2026 at 10:00 am via Zoom. One hour has been booked for this purpose. Please ensure all materials are uploaded to Case Centre by the afternoon before (when I shall do a sweep if I am still seized of the motion) and any later materials (given the timetable, I assume not....) are to be forwarded

via email through the Commercial List office to me.

 Digitally signed
by Sean Dunphy
Date: 2026.04.01
13:14:50 -04'00'

Date: April 1, 2026

Mister Justice Sean Dunphy

**ONTARIO
SUPERIOR COURT OF JUSTICE
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COURTS OF JUSTICE ACT, R.S.O. 1990, c. C.43, AS AMENDED**

**AIDE-MÉMOIRE OF ROYAL BANK OF CANADA
(returnable on Wednesday, April 1, 2026)**

1. This aide-memoire is filed by Royal Bank of Canada (“**RBC**”), in support of the receivership application against International Trucking Incorporated and 1000563626 Ontario Inc. (together, the “**Debtors**”).
2. Following service of the Application Record of RBC on March 19, 2026, counsel have been in discussions regarding the Debtors’ adjournment request, which RBC is willing to accommodate in accordance with the three Cs of the Commercial List.
3. RBC and the Debtors have agreed upon a short-term timetable to deal with the hearing of this matter (the “**Timetable**”). The Timetable is as follows, subject to this Court’s approval:

- (a) Responding Application Record to be delivered by **April 17, 2026**;
- (b) Reply Materials to be delivered by **April 22, 2026**;
- (c) Cross-examinations to be held by **April 27-28, 2026**, if any;
- (d) Answer to Undertakings to be fulfilled by **May 1, 2026**, if any;
- (e) Applicant's Factum to be delivered by **May 6, 2026**;
- (f) Respondents' Factum to be delivered by **May 13, 2026**; and
- (g) One-hour Application to be heard in the **week of May 18, 2026** (pending Court availability).

All of which is respectfully submitted, this 31st day of March, 2026.



per AIRD & BERLIS LLP

ROYAL BANK OF CANADA

- and -

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Applicant

Respondents

Court File No. CL-26-00000101-0000

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

Proceedings commenced at Toronto

AIDE-MEMOIRE

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Lawyers for Royal Bank of Canada

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Court File No. CL-26-00000101-0000

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(Commercial List)

Proceedings commenced at Toronto

AFFIDAVIT OF ADAM HAUGH
(sworn May 20, 2026)

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