

**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

**SUPPLEMENTARY MOTION RECORD OF THE APPLICANT,
ROYAL BANK OF CANADA**

(Motion for an Order appointing a Receiver)

May 25, 2026

GOWLING WLG (CANADA) LLP
1 First Canadian Place
100 King Street West, Suite 1600
Toronto, ON M5X 1G5

E. Patrick Shea, KC (LSO# 39655K)
patrick.shea@gowlingwlg.com
Tel: 416-369-7399

Rachel Moses (LSO# 42081V)
rachel.moses@gowlingwlg.com
Tel: 416-862-3630

Carol Liu (LSO# 84938G)
carol.liu@gowlingwlg.com
Tel: 416-862-4300

Lawyers for the Applicant, Royal Bank of
Canada

TO: **CP LLP**
77 King Street West
TD North Tower
Toronto, ON. M5K 1G8

Attention: Alastair McNish
Solicitor for the Respondents
Tel: 416-644-9966
Email: amcnish@cpllp.com

AND TO: **MSI SPERGEL INC.**
200 Yorkland Blvd., Suite 1100
Toronto, ON. M2J 5C1

Attention: Mukul Manchanda
Email: mmanchanda@spergel.ca

Proposed Receiver

AND TO: **DAIMLER TRUCK FINANCIAL SERVICES CANADA CORPORATION**
2680 Matheson Blvd. East, Suite 202
Mississauga, ON. L4W 0A5

Attention: Lee Bannerman
Email: lee.bannerman@mercedes-benz.com

Secured Creditor

AND TO: **VFS CANADA INC.**
238 Wellington Street, East
3rd Floor
Aurora, ON. L4G 1J5
Email: vfs.info.ca@volvo.com

Secured Creditor

AND TO: **STOUGHTON TRAILERS CANADA CORPORATION**
1800 Greenbriar Drive
Stoughton, WI
53589 USA
Email: sales@stoughtontrailers.com

Secured Creditor

AND TO: **TRANSPORT TRAILER SALES INC.**
8085 Esquesing Line
Milton, ON. L9T 9E3
Email: nlambevski@ttsi.ca

Secured Creditor

AND TO: **R & S TRAILER LEASING LIMITED (O/A BREADNER TRAILERS)**
5185 Fountain Street North
Breslau, ON. N0B 1M0
Email: sales@breadnertrailers.com

Secured Creditor

AND TO: **CONCENTRA EQUIPMENT FINANCE, A. DIVISION OF BENNINGTON FINANCIAL CORP.**
100-1465 North Service Road East
Oakville, ON. L6H 1A7
Email: clientsupport@eqbank.ca

Secured Creditor

AND TO: **DUCA FINANCIAL SERVICES CREDIT UNION LTD.**
5290 Yonge Street
North York, ON. M2N 5P9
Email: btruffen@duca.com
Secured Creditor

AND TO: **COAST CAPITAL EQUIPMENT FINANCE LTD.**
800-9900 King George Blvd.
Surrey, BC. V3T 0K7
Email: cservice@coastcapitalsavings.com

Secured Creditor

AND TO: **PNC VENDOR FINANCE CORPORATION CANADA**
2140-130 King Street West
Toronto, ON. M5X 1E4
Email: Canadabrand@pnc.com

Secured Creditor

AND TO: **VAULT CREDIT CORPORATION**
41 Scarsdale Road, Suite 5
Toronto, ON. M3B 2R2
Email: support@vaultcredit.ca; info@vaultcredit.ca

Secured Creditor

AND TO: **DUCA FINANCIAL SERVICES CREDIT UNION LTD.**
5255 Yonge Street, 4th Floor
Toronto, ON. M2N 6P4
Email: btruffen@duca.com
Secured Creditor

AND TO: **THE BANK OF NOVA SCOTIA**
10 Wright Boulevard
Stratford, ON. N5A 7X9

Attention: Lisa Alleyne
Email: lisa.alleyne@scotiabank.com

Secured Creditor

AND TO: **2076401 ONTARIO INC.**
6050 Dixie Road
Mississauga, ON. L5T 1A6

Secured Creditor

AND TO: **RCAP LEASING INC.**
5575 North Service Road, Suite 300
Burlington, ON. L7L 6M1
Email: rcap.collections@rcapleasing.com

Secured Creditor

AND TO: **CREDIT-BAIL RCAP INC.**
5575 North Service Road, Suite 300
Burlington, ON. L7L 6M1
Email: rcap.collections@rcapleasing.com

Secured Creditor

AND TO: **PACCAR FINANCIAL LTD.**
6711 Mississauga Road, Suite 500
Mississauga, ON. L5N 4J8
Email: PFC.Customer.Service@Paccar.com

Secured Creditor

AND TO: **MERIDIAN ONECAP CREDIT CORP.**
Suite 1500-4710 Kingsway
Burnaby, BC. V5H 4M2
Email: client.service@meridianonecap.ca;
LossRecovery@meridianonecap.ca; Collections@meridianonecap.ca

Secured Creditor

AND TO: **TFG FINANCIAL CORPORATION**
400-4180 Lougheed Highway
Burnaby, BC. V5C 6A7
Email: info@tfgfinancial.com

Secured Creditor

AND TO: **GEOLIN CREDIT-BAIL INC.**
401-3135 Boul. Moise-Vincent
Saint-Hubert, QC. J3Z 0G7
Email: applications@geolin.ca

Secured Creditor

AND TO: **MITSUBISHI HC CAPITAL CANADA LEASING, INC.**
2200 Rue De La Sidbec Sud
Trois-Rivieres, QC. G8Z 4H1

Attention: Emily Rumble
Email: erumble@mhccna.com

Secured Creditor

AND TO: **CONCENTRA BANK**
c/o Comm Leasing,
Box 3030
Regina, SK. S4P 3G8
Email: clientsupport@eqbank.ca
Secured Creditor

AND TO: **WELLS FARGO EQUIPMENT FINANCE COMPANY**

900/1100-1290 Central Parkway West

Mississauga, ON. L5C 4R3

Email: customerservice@financialservicing.net

Attention: Nyna Bishop

Email: nyna.bishop@wellsfargo.com; nyna.c.bishop@financialservicing.net

Secured Creditor

AND TO: **BODKIN, A DIVISION OF BENNINGTON FINANCIAL CORP.**

102-1465 North Service Road East

Oakville, ON. L6H 1A7

Email: legal@benningtonfinancial.ca

Attention: Lisa Lackey

Email: lisal@benningtonfinancial.ca

Secured Creditor

AND TO: **CONCENTRA BANK**

c/o Comm Leasing,

333-3rd Street

Saskatoon, SK. S7K 2M2

Email: clientsupport@eqbank.ca

Secured Creditor

AND TO: **LBEL INC.**

5035 South Service Road

Burlington, ON. L7L 6M9

Email: TCEquipadmin@lbccapital.ca

Secured Creditor

AND TO: **MERIDIAN ONECAP CREDIT CORP.**

204-3185 Willingdon Green

Burnaby, BC. V5G 4P3

Email: client.service@meridianonecap.ca;

LossRecovery@meridianonecap.ca; Collections@meridianonecap.ca

Secured Creditor

AND TO: **BANK OF MONTREAL**
5750 Explorer Drive, 2nd Floor
Mississauga, ON. L4W 0A9
Email: LRCPLitigationParalegalServices@bmo.com

Secured Creditor

AND TO: **DE LAGE LANDEN FINANCIAL SERVICES CANADA INC.**
3450 Superior Court, Unit 1
Oakville, ON. L6L 0C4
Email: Collections-ca@leasedirect.com; lossrecovery@leasedirect.com;
clientservices-ca@leasedirect.com

Secured Creditor

AND TO: **CANADA REVENUE AGENCY**
c/o Department of Justice
Ontario Regional Office
120 Adelaide St. W., Suite 400
Toronto, ON M5H 1T1
Email: AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca

AND TO: **INSOLVENCY UNIT**
Ontario Ministry of Finance
33 King Street West
Oshawa, ON L1H 8H5
Email: insolvency.unit@ontario.ca

AND TO: **HIS MAJESTY THE KING IN RIGHT OF ONTARIO**
as represented by the Ministry of Finance
Legal Services Branch
33 King Street, 6th Floor
Oshawa, ON L1H 8H5

Attention: Steven Groeneveld
Email: steven.groeneveld@ontario.ca
Tel: 905-440-2470

Senior Counsel, Ministry of Finance

**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
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Respondents

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TAB 1

Court File No. CL-26-00000202-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

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

APPLICATION UNDER SECTION 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

**SUPPLEMENTARY AFFIDAVIT OF RUSTON MARTIN
(sworn May 25, 2026)**

I, RUSTON MARTIN, of the City of Toronto, in the Province of Ontario, **MAKE OATH
AND SAY:**

1. I am a Senior Manager, Special Loans at RBC, with carriage of the RBC accounts of the Debtors. I have personal knowledge of the matters to which I hereinafter depose. Where I do not have personal knowledge, I have stated the source of my information and, in all such cases, believe the information to be true.

2. This Affidavit is sworn in addition to my affidavit sworn on May 21, 2026 (the “**Initial Affidavit**”). Unless otherwise indicated, capitalized terms used in this affidavit and not otherwise defined herein have the meanings given to them in the Initial Affidavit.

3. The purpose of this affidavit is to update the Court on findings from an attendance at Roadx's business premises.

4. According to its corporate profile report and website, the registered head office and business premises of Roadx are at 33 Armstrong Avenue, Georgetown, Ontario (the "**Armstrong Premises**"). Attached as **Exhibit "A"** are copies of the corporate profile report of Roadx obtained on April 7, 2026 and a screenprint of Roadx's website <https://roadxexpress.com/> obtained on May 14, 2026.

5. I am advised by Mukul Manchanda, Managing Partner of Corporate Restructuring and Insolvency at msi Spergel inc., and believe that on May 22, 2026, Mr. Manchanda personally attended at the Armstrong Premises.

6. I am further advised by Mr. Manchanda and believe that he saw the Armstrong Premises had an empty truck yard and an empty office, and the exterior signage was removed. Attached as **Exhibit "B"** are copies of the photographs of the interiors and exteriors of the Armstrong Premises, taken by Mr. Manchanda on May 22, 2026.

7. RBC was not advised by Roadx that it would be relocating. RBC is not aware of what had happened to its collateral and does not know where its collateral is currently located.

8. I swear this Supplementary Affidavit in support of the Motion for a receivership order and for no other or improper purpose.

SWORN by Ruston Martin of the City of Toronto, in the Province of Ontario, before me at the City of Toronto, in the Province of Ontario, on May 25, 2026 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Adam Bovaird, Law Society #P00828
Commissioner for Taking Affidavits
(or as may be)



RUSTON MARTIN

This is **Exhibit "A"** referred to
in the Affidavit of Ruston Martin
Sworn this 25th
day of May, 2026.



.....
A Commissioner for Taking Affidavits



Ministry of Public and
Business Service Delivery

Profile Report

ROADX EXPRESS LTD. as of April 07, 2026

Act	Business Corporations Act
Type	Ontario Business Corporation
Name	ROADX EXPRESS LTD.
Ontario Corporation Number (OCN)	5032353
Governing Jurisdiction	Canada - Ontario
Former Jurisdiction	Canada - Nova Scotia
Status	Active
Date of Incorporation/Amalgamation	September 18, 2019
Date of Continuance	November 17, 2021
Registered or Head Office Address	Attention/Care of ROADX EXPRESS LTD, 33 Armstrong Avenue, Unit 2, Georgetown, Ontario, L7G4S1, Canada

Certified a true copy of the record of the Ministry of Public and Business Service Delivery.

A handwritten signature in black ink, appearing to read "V. Quintanilla W.".

Director/Registrar

This report sets out the most recent information filed on or after June 27, 1992 in respect of corporations and April 1, 1994 in respect of Business Names Act and Limited Partnerships Act filings and recorded in the electronic records maintained by the Ministry as of the date and time the report is generated, unless the report is generated for a previous date. If this report is generated for a previous date, the report sets out the most recent information filed and recorded in the electronic records maintained by the Ministry up to the "as of" date indicated on the report. Additional historical information may exist in paper or microfiche format.

Minimum Number of Directors 1
Maximum Number of Directors 10

Active Director(s)

Name SAMREET KAUR KAHLON
Address for Service 65 Loons Call Crescent, Brampton, Ontario, L6R 2G4,
Canada
Resident Canadian Yes
Date Began September 18, 2019

Certified a true copy of the record of the Ministry of Public and Business Service Delivery.

V. Quintanilla W.

Director/Registrar

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Active Officer(s)

There are no active Officers currently on file for this corporation.

Certified a true copy of the record of the Ministry of Public and Business Service Delivery.

V. Quintanilla W.

Director/Registrar

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Corporate Name History**Name**

ROADX EXPRESS LTD.

Effective Date

November 17, 2021

Previous Name

ROADX EXPRESS LTD.

Effective Date

October 26, 2020

Previous Name

3330408 NOVA SCOTIA LIMITED

Effective Date

April 09, 2020

Certified a true copy of the record of the Ministry of Public and Business Service Delivery.

V. Quintanilla W.

Director/Registrar

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Active Business Names

This corporation does not have any active business names registered under the Business Names Act in Ontario.

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V. Quintanilla W.

Director/Registrar

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Expired or Cancelled Business Names

This corporation does not have any expired or cancelled business names registered under the Business Names Act in Ontario.

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V. Quintanilla W.

Director/Registrar

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Document List

Filing Name	Effective Date
CIA - Notice of Change PAF: SAMREET KAUR KAHLON	November 27, 2025
Archive Document Package	September 24, 2025
CIA - Notice of Change PAF: SAMREET KAUR KAHLON	September 16, 2025
CIA - Notice of Change PAF: SAMREET KAUR KAHLON	September 03, 2024
CIA - Notice of Change PAF: SAMREET KAUR KAHLON	July 07, 2023
CIA - Notice of Change PAF: Samreet Kaur KAHLON	November 04, 2022
CIA - Notice of Change PAF: Samreet Kaur KAHLON	November 04, 2022
CIA - Notice of Change PAF: Samreet Kaur KAHLON	July 26, 2022
CIA - Notice of Change PAF: Samreet Kaur KAHLON	July 06, 2022
CIA - Initial Return PAF: Samreet Kaur KAHLON	December 08, 2021
BCA - Articles of Continuance	November 17, 2021
CIA - Notice of Change PAF: SAMREET KAUR - DIRECTOR	October 26, 2020
CIA - Initial Return PAF: SAMREET KAUR - DIRECTOR	April 09, 2020

All "PAF" (person authorizing filing) information is displayed exactly as recorded in the Ontario Business Registry. Where PAF is

Certified a true copy of the record of the Ministry of Public and Business Service Delivery.

V. Quintanilla W.

Director/Registrar

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not shown against a document, the information has not been recorded in the Ontario Business Registry.

Certified a true copy of the record of the Ministry of Public and Business Service Delivery.

V. Quintanilla W.

Director/Registrar

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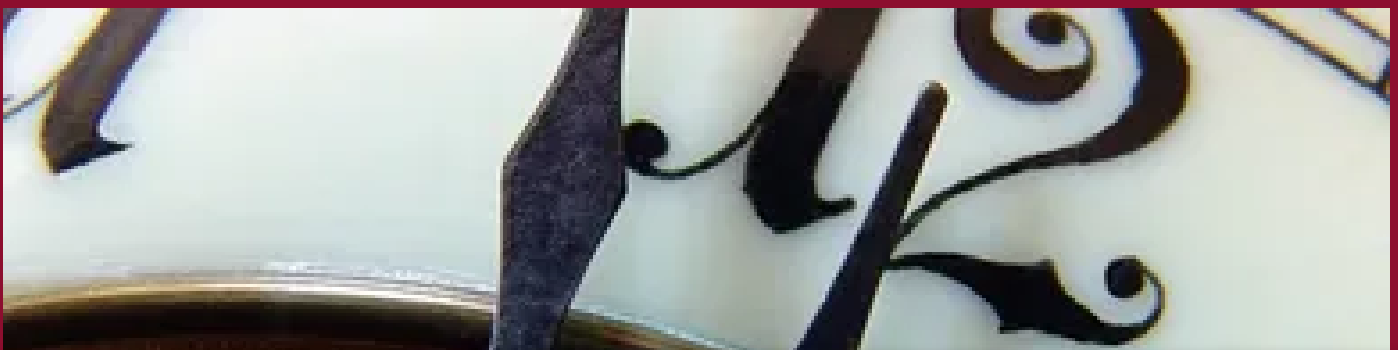
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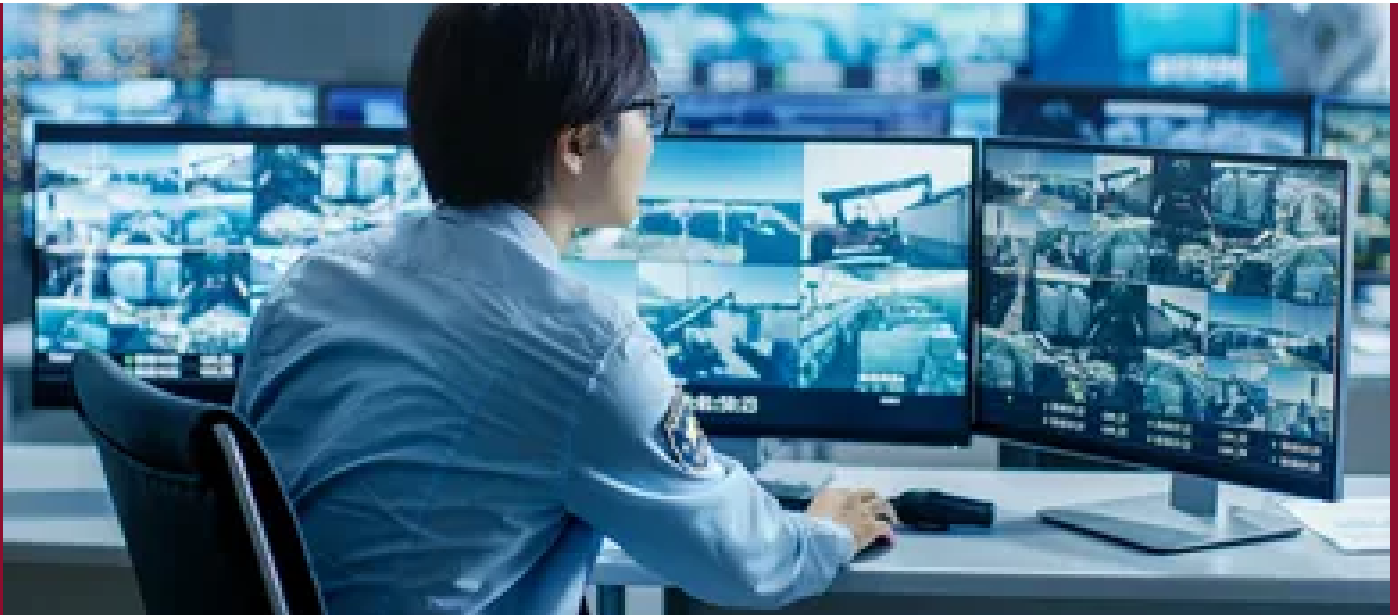


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33 Armstrong Avenue, Georgetown, ON - L7G 4S1

888-907-0634

info@roadxexpress.com | helpdeskroadx@yahoo.com

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This is **Exhibit "B"** referred to
in the Affidavit of Ruston Martin
Sworn this 25th
day of May, 2026.



.....
A Commissioner for Taking Affidavits













ROYAL BANK OF CANADA
Applicant

-and-

ROADX EXPRESS LTD. et al.
Respondents
Court File No. CL-26-00000202-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT
TORONTO

SUPPLEMENTARY AFFIDAVIT OF RUSTON MARTIN

GOWLING WLG (CANADA) LLP

Barristers & Solicitors
1 First Canadian Place
100 King Street West, Suite 1600
Toronto, ON M5X 1G5

E. Patrick Shea, KC (LSO# 39655K)

patrick.shea@gowlingwlq.com

Tel: 416-369-7399

Rachel Moses (LSO# 42081V)

rachel.moses@gowlingwlq.com

Tel: 416-862-3630

Carol Liu (LSO# 84938G)

carol.liu@gowlingwlq.com

Tel: 416-862-4300

Lawyers for the Applicant, Royal Bank of Canada

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-and-

ROADX EXPRESS LTD. et al.
Respondents

Court File No. CL-26-00000202-0000

**ONTARIO
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PROCEEDING COMMENCED AT
TORONTO

SUPPLEMENTARY MOTION RECORD

GOWLING WLG (CANADA) LLP

Barristers & Solicitors
1 First Canadian Place
100 King Street West, Suite 1600
Toronto, ON M5X 1G5

E. Patrick Shea, KC (LSO# 39655K)

patrick.shea@gowlingwlq.com

Tel: 416-369-7399

Rachel Moses (LSO# 42081V)

rachel.moses@gowlingwlq.com

Tel: 416-862-3630

Carol Liu (LSO# 84938G)

carol.liu@gowlingwlq.com

Tel: 416-862-4300

Lawyers for the Applicant, Royal Bank of Canada