

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N :

THE BANK OF NOVA SCOTIA

Applicant

- and -

CAMERON PARTNERS LTD.

Respondent

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, AS AMENDED

SUPPLEMENTARY MOTION RECORD

October 1, 2026

SPETTER ZEITZ KLAIMAN PC
Barristers and Solicitors
100 Sheppard Avenue East, Suite 850
Toronto, Ontario M2N 6N5
Tel.: (416) 789-0652
Fax: (416) 789-9015

JAMES S. QUIGLEY
LSO No. 42924B
Email: jsquigley@szklaw.ca

Lawyers for the Receiver, msi Spergel Inc.

TO: THIS HONOURABLE COURT

AND TO: SERVICE LIST

SERVICE LIST

TO:	THE BANK OF NOVA SCOTIA c/o Harrison Pensa LLP 130 Dufferin Avenue, Suite 1101 London, Ontario N6A 5R2 Attn: Melinda Vine mvine@harrisonpensa.com
AND TO:	CAMERON PARTNERS LTD. 670 Cameron Avenue Windsor, Ontario N9B 1Z1 Patrick.investor@gmail.com
AND TO:	DORIS LEUNG 93 Plum Tree Circle Markham, Ontario L69 1V9
AND TO:	PATRICK LEUNG 1808-5189 Gaston Street Vancouver, Ontario V5R 6C7 Patrick.investor@gmail.com
AND TO:	CITY OF WINDSOR 400 City Hall Square East, Suite 201 Windsor, Ontario N9A 7K6 sstrosberg@citywindsor.ca
AND TO:	1212279 B.C. LTD. 564 24 th Avenue West Vancouver, Ontario V5Z 2B4 e.soon@live.com
AND TO:	INDCOM LEASING INC. 5061 Ure Street Oldcastle, Ontario N0R 1L0 support@indcomleasing.com
AND TO:	DEPARTMENT OF JUSTICE (CANADA) Ontario Regional Office 120 Adelaide Street West, Suite 400 Toronto, Ontario M5H 1T1

	Email: AGC_PGC_Toronto.Lead-DCECJ@justice.gc.ca
AND TO:	MINISTRY OF FINANCE INSOLVENCY UNIT 6 th Floor, 33 King Street West Oshawa, Ontario L1H 8H5 Email: insolvency.unit@ontario.ca
AND TO:	CANADA REVENUE AGENCY 1 Front Street West Toronto, Ontario M5J 2X6 Email: AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca

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SUPERIOR COURT OF JUSTICE

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I N D E X

Tab	Document
A.	Supplementary Second Report of the Receiver dated September 30, 2026
1.	Appendix “1” – Order of Justice Bezairé dated February 24, 2026
2.	Appendix “2” - Receiver’s Fee Affidavit sworn September 30, 2026
3.	Appendix “3” – Receiver’s Counsel Fee Affidavit sworn September 30, 2026

TAB A

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE BANK OF NOVA SCOTIA

Applicant

and

CAMERON PARTNERS LTD.

Respondents

**SUPPLEMENT TO THE SECOND REPORT OF MSI SPERGEL INC.
IN ITS CAPACITY AS COURT-APPOINTED RECEIVER OF
CAMERON PARTNERS LTD.**

SEPTEMBER 30, 2026

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II.	PROFESSIONAL FEES AND DISBURSEMENTS.....	4

APPENDICES

1. Order of Justice Bezaire dated February 24, 2026
2. Receiver's Fee Affidavit sworn September 30, 2026
3. Receiver's Counsel Fee Affidavit sworn September 30, 2026

I. PURPOSE OF THIS SUPPLEMENTARY REPORT

1. This purpose of this Supplementary Report is to update the Court regarding the professional fees and disbursements incurred by both the Receiver and the Receiver's Counsel subsequent to November 30, 2025, in the case of the Receiver and subsequent to December 19, 2025, in the case of Receiver's Counsel.
2. The fees prior to the aforementioned dates were supported by sworn Fee Affidavits included with the Receiver's First Report and approved by the Honourable Justice Bezaire on February 24, 2026. A copy of the Ancillary Order of Justice Bezaire is attached to this Supplementary Report as **Appendix "1"**.

II. PROFESSIONAL FEES AND DISBURSEMENTS

3. Further to the Ancillary Order of the Honourable Justice Bezaire, a fee accrual in the amount of \$200,000 plus disbursements and HST was approved, provided that there was no opposition to the relief sought by the Receiver in its First Report.
4. Attached to this Supplementary Report as **Appendix "2"** is the Affidavit of Philip Gennis sworn September 30, 2026 (the "**Receiver's Fee Affidavit**") which incorporates by reference a copy of the Receiver's time dockets pertaining to the receivership of Cameron for the period from December 1, 2025 to and including September 30, 2026, in the amount of \$76,509.44 (inclusive of HST and disbursements). This represents a total of 159.55 hours at an effective rate of \$424.02 per hour excluding HST.
5. Attached to this First Report as **Appendix "3"** is the Affidavit of Ian Klaiman sworn September 30 (the "**Receiver's Counsel Fee Affidavit**") which incorporates by reference a copy of the time dockets of the Receiver's Counsel for the period from December 19, 2025, to and including September 30, 2026 in the amount of \$42,219.58 inclusive of disbursements and HST.

6. The Receiver has reviewed the accounts of the Receiver's Counsel and is of the view that the work set out in these accounts was carried out and was necessary, that the hourly rates of the lawyers who worked on this matter were reasonable in light of the services required and that the services were carried out by lawyers with the appropriate level of experience.
7. The professional fees incurred by the Receiver and its Counsel since the February 24th Order have not exhausted the fee accrual. That having been said, given the likelihood of an opposition to the relief being sought by the Receiver herein, the Receiver requested that the fee accrual be increased to \$300,000.00.

All of which is respectfully submitted.

Dated at Toronto, Ontario this 30th day of September 2026.

msi Spergel inc.
solely in its capacity as the Court-appointed
Receiver of the Debtor and not in its personal
or corporate capacities

Per: *Philip H. Gennis*

Philip H. Gennis, JD., CIRP, LIT
Licensed Insolvency Trustee

APPENDIX “1”

Court File No.: CV-25-00034491-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

THE HONOURABLE

)

TUESDAY, THE 24TH

JUSTICE BEZAIRE

)

DAY OF FEBRUARY, 2026

)

B E T W E E N :

THE BANK OF NOVA SCOTIA

Applicant



- and -

CAMERON PARTNERS LTD.

Respondent

APPLICATION UNDER Section 243(1) of the *Bankruptcy and Insolvency Act*, R.S.C 1985, c. B-3, and Section 101 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43.

ANCILLARY ORDER

THIS MOTION made by **MSI SPERGEL INC.** (the "**Receiver**" or "**Spergel**") in its capacity as receiver appointed, without security, of all the assets, undertakings and properties of Cameron Partners Ltd. (the "**Debtor**") acquired for, or used in relation to business carried on by the Debtor, by Order of the Ontario Superior Court of Justice dated April 8 2025, made pursuant to Section 243(1) of the *Bankruptcy and Insolvency Act*, R.S.C 1985, c. B-3, and Section 101 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43., as amended, for an order, *inter alia*:

- (a) approving the First Report of the Receiver dated January 16, 2026 (the “**First Report**”) and the actions and activities of the Receiver described herein;
- (b) sealing the Confidential Appendices to First Report;
- (c) approving the Receiver’s interim statement of receipts and disbursements as of November 30, 2025, attached as Appendix “10” to the First Report (the “**Interim SRD**”).
- (d) approving the fees and disbursements of the Receiver and the Receiver’s Counsel as detailed in the First Report of the Receiver including the fee accrual and payment of same;
- (e) approving the Receiver’s proposed interim distribution as set out in the First Report and authorizing the distribution of funds according to same.

was heard this day at the Court House, 245 Windsor Avenue, Windsor, Ontario.

ON READING the First Report and the fee affidavits of the Receiver and its counsel appended to the First Report (collectively, the “**Fee Affidavits**”), and on hearing the submissions of counsel for the Receiver, no one appearing for any other person on the service list, although properly served as appears from the Affidavit of Service of Tiegan Kilbride sworn February 3, 2026,

1. **THIS COURT ORDERS** that all capitalized terms not otherwise defined herein shall have the meaning given to them in the First Report.
2. **THIS COURT ORDERS** that the time for service of the Notice of Motion and the Motion Record be and are hereby abridged and validated such that this motion is properly returnable this day and hereby dispenses with further service thereof.

3. **THIS COURT ORDERS** that the First Report and the activities of the Receiver as set out therein are hereby approved, provided, however, that only the Receiver, in its personal capacity and only with respect to its own personal liability, shall be entitled to rely upon or utilize in any way such approval.
4. **THIS COURT ORDERS** that the Interim SRD be and is hereby approved.
5. **THIS COURT ORDERS** that the fees and disbursements of the Receiver and its counsel as set out in the First Report and the Fee Affidavits attached thereto, including the Fee Accrual set out at paragraph 32 of the First Report, are hereby approved and the Receiver is authorized to pay any unpaid fees and disbursements herein approved including the Fee Accrual.
6. **THIS COURT ORDERS** that the Receiver is authorized, but not obligated, to make the Proposed Interim Distribution (as described and defined at paragraph 38 of the First Report).
7. **THIS COURT ORDERS** that that Confidential Appendices to the First Report shall be sealed, kept confidential, and shall not form part of the public record, but shall rather be placed separate and apart from all other contents of the Court File in a separately sealed envelope on which is affixed is a notice setting out the title of these proceedings and a statement that the contents are subject to a sealing order. The Confidential Appendices shall be sealed until the earlier to the completion of the Cameron Avenue Transaction (as that term is defined at paragraph 6(ii) of the First Report) or further order of the Court.

Date of Issuance: February 24, 2026

(to be completed by the registrar)



(Signature of Justice)

THE BANK OF NOVA SCOTIA
Applicant

and

CAMERON PARTNERS LTD.
Respondent

Court File No. CV-25-00034491-0000

ONTARIO
SUPERIOR COURT OF JUSTICE

Proceeding commenced at
WINDSOR

ORDER

SPETTER ZEITZ KLAIMAN PC
Barristers and Solicitors
100 Sheppard Avenue East, Suite 850
Toronto, Ontario M2N 6N5

JAMES S. QUIGLEY
LSO No. 42924B
Tel: (416) 789-0659
Email: jsquigley@szklaw.ca

Lawyers for the Receiver,
msi Spergel inc.

APPENDIX “2”

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

THE BANK OF NOVA SCOTIA

Applicants

- and -

CAMERON PARTNERS LTD.

Respondents

AFFIDAVIT OF PHILIP GENNIS
(sworn September 30, 2026)

I, **PHILIP GENNIS**, of the City of Vaughan, in the Province of Ontario, **MAKE OATH AND SAY AS FOLLOWS:**

1. I am a Licensed Insolvency Trustee with msi Spergel inc. ("**Spergel**"), the Court-Appointed Receiver (in such capacity, the "**Receiver**") of Cameron Partners Ltd. ("**CAME**") and as such have knowledge of the matters to be deposed herein, except where such knowledge is stated to be based on information and belief, in which case I state the source of the information and verily believe such information to be true.
2. The Receiver was appointed, without security, of all of the assets, undertakings and properties of the Debtors by Order of the Honourable Mr. Justice T. Heeney of the Ontario Superior Court of Justice made April 8, 2025.
3. In connection with the receivership of CAME for the period December 1, 2025 to September 30, 2026, fees of \$76,509.44 (inclusive of HST and disbursements) were charged by Spergel as detailed in the billing summary and time dockets

attached hereto as **Exhibit "1"** to this my Affidavit. This represents 159.55 hours at an effective rate of \$424.02 per hour.

4. The hourly billing rates detailed in this Affidavit are comparable to the hourly rates charged by Spergel for services rendered in relation to similar proceedings.
5. This Affidavit is made in support of a motion to, *inter alia*, approve the receipts and disbursements of the Receiver and its accounts.
6. I make this Affidavit for no improper purpose.

SWORN BEFORE ME at the City)
of Toronto, in the Province of)
Ontario, this 30th day of September)
2026.)



A Commissioner, etc.)

Philip H. Gennis

PHILIP GENNIS

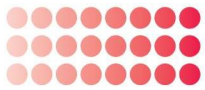
Barbara Eileen Sturge,
a Commissioner, etc. for msi Spergel inc.
and Spergel & Associates Inc.
Expires September 21, 2028

**This is Exhibit “1” of the Affidavit of
PHILIP GENNIS
Sworn before me on this 30th day of September 2026**



A Commissioner, Etc.

Barbara Eileen Sturge,
a Commissioner, etc. for msi Spengel inc.
and Spengel & Associates Inc.
Expires September 21, 2028



SPERGEL

msi Spergel inc., Licensed Insolvency Trustees
Head Office: 200 Yorkland Blvd., Suite 1100
Toronto, ON., M2J 5C1
T: 416 497 1660 • F: 416 494 7199
www.spergel.ca

July 11, 2026

PAID

Invoice #: 13165

Cameron Partners Ltd.

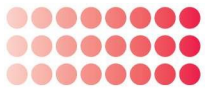
INVOICE

RE: Cameron Partners Ltd.

FOR PROFESSIONAL SERVICES RENDERED to May 31, 2026

Professional Services	Hours	Hourly Rate	Total
Mukul Manchanda, CPA, CIRP, LIT	7.50	\$575.00	\$4,312.50
Philip H. Gennis, LL.B., CIRP, LIT	52.70	\$575.00	\$30,302.50
Gillian Goldblatt, CPA, CA, CIRP, LIT	0.70	\$425.00	\$297.50
Paula Amaral	4.70	\$425.00	\$1,997.50
Dharam Tiwana	46.80	\$295.00	\$13,806.00
Eileen Sturge	0.80	\$250.00	\$200.00
Manocher Sarabi	16.60	\$175.00	\$2,905.00
Cassandra Glover	3.10	\$110.00	\$341.00
Total Professional Services	132.90	\$407.54	\$54,162.00
HST			\$7,041.06
Reimbursable Expenses			Total
Courier			\$32.73
PPSA Search			\$8.00
Total Reimbursable Expenses			\$40.73
HST on expenses			\$4.25

Total	\$61,248.04
HST Registration #R103478103 (AACAME-R)	

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July 11, 2026

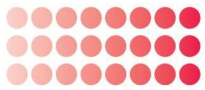
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Cameron Partners Ltd.

INVOICE**INVOICE RECONCILIATION PAGE**

Date	Staff	Memo	Hours	B-Rate	Amount
Professional Services					
2025-12-01	PGE	Email exchange and telephone discussion with Receiver's Counsel; email from Bank;	0.25	\$575.00	\$143.75
2025-12-01	GGO	Receive and review September bank reconciliation.	0.10	\$425.00	\$42.50
2025-12-01	DTI	Review correspondence with counsel, previous property management.	0.20	\$295.00	\$59.00
2025-12-02	PGE	Email from Patrick Leung; email exchange and call with Receiver's Counsel regarding communication with Debtor's Counsel;	0.30	\$575.00	\$172.50
2025-12-03	PGE	Email exchange with Banking regarding deposit; email with Debtor regarding purported refinancing; email to Receiver's Counsel requesting that a response be sent to the Debtor advising of binding APS;	0.30	\$575.00	\$172.50
2025-12-03	DTI	Correspondence with Cogeco and MPS regarding return of equipment.	0.30	\$295.00	\$88.50
2025-12-03	MMA	Receipt and review of email exchange with P. Leung (Centaria Properties) regarding payout statements and other requested financial information.	0.30	\$575.00	\$172.50
2025-12-03	PAM	Source invoices from suppliers and forward for processing. Review requisitions prepared by M. Manocher for payment of invoices.	0.30	\$425.00	\$127.50
2025-12-03	MSR	Multiple Emails, received, reviewed and responded to regarding the Abell refund deposit.	0.50	\$175.00	\$87.50
2025-12-09	DTI	Correspondence with MPS, arrange for snow plowing at property.	1.00	\$295.00	\$295.00
2025-12-09	PGE	Email exchange between Receiver's Counsel and Counsel for Debtor; further email from Debtor; telephone discussion with Receiver's Counsel; brief conversation with Counsel for BNS; email to Counsel for BNS;	0.75	\$575.00	\$431.25
2025-12-09	MMA	Receipt and review of email exchange with P. Leung (Centaria Properties) regarding update on file.	0.10	\$575.00	\$57.50
2025-12-10	DTI	Correspondence with All-In for snow plowing, review invoice.	0.30	\$295.00	\$88.50

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Oshawa 905 721 8251 • Peterborough 705 748 3333 • Scarborough 416 642 1363 • Toronto 416 778 8813 • Vaughan 647 288 7636
Saskatchewan 306 341 1660 • British Columbia 604 365 7434

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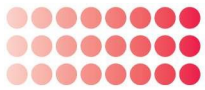
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Cameron Partners Ltd.

INVOICE

2025-12-11	CGL	Administrative work including review and redact purchase documents.	0.10	\$110.00	\$11.00
2025-12-12	PGE	Review and execution of Receiver's Fee Affidavit;	0.50	\$575.00	\$287.50
2025-12-14	GGO	Receive and review bank reconciliation.	0.10	\$425.00	\$42.50
2025-12-17	PGE	Receipt and review of final progress report and offer matrix from listing broker; drafting First Report to Court; assembling of appendices; email with Eugene at BNS regarding current approximate debt to Bank;	4.50	\$575.00	\$2,587.50
2025-12-17	MMA	Receipt and review of SZK Law's accounts.	0.20	\$575.00	\$115.00
2025-12-17	MSR	Prepared, reviewed multiple cheque requisitions to pay multiple vendors, Emailed send and response received regarding the property management outstanding invoices.	3.00	\$175.00	\$525.00
2025-12-18	PGE	Final revisions to Report and transmittal of report to Counsel; receipt and review of Counsel's fee affidavit; email exchange with ppty manager regarding lack of heat in one unit;	1.50	\$575.00	\$862.50
2025-12-18	DTI	Correspondence with MPS regarding property.	0.20	\$295.00	\$59.00
2025-12-19	CGL	Review and edit court report.	0.30	\$110.00	\$33.00
2025-12-20	PGE	Minor revisions to report;	0.25	\$575.00	\$143.75
2025-12-21	PGE	Further minor revision to report and transmittal to Counsel;	0.25	\$575.00	\$143.75
2025-12-22	PGE	Email from Counsel with respect to report;	0.10	\$575.00	\$57.50
2025-12-22	CGL	Review and edit draft first report to court.	0.20	\$110.00	\$22.00
2025-12-23	MMA	Review documents, account details, and approve payables.	0.70	\$575.00	\$402.50
2025-12-23	MSR	Submitted cheque requisitions for final review and approval.	0.20	\$175.00	\$35.00
2025-12-23	PAM	Review requisitions for payment for payables prepared by M. Sarabi.	0.30	\$425.00	\$127.50
2025-12-28	PGE	Email from Patrick Leung; forwarding email to Counsel for response;	0.20	\$575.00	\$115.00
2025-12-30	PGE	Email from Principal of Debtor; forwarding email to Counsel; email exchange and telephone discussion with Counsel; email exchange with property manager;	0.60	\$575.00	\$345.00
2025-12-31	PGE	Email exchange with property manager;	0.20	\$575.00	\$115.00

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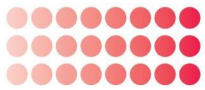
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Cameron Partners Ltd.

INVOICE

2026-01-02	PGE	Email from Patrick Leung regarding insurance; email exchange with Counsel regarding Motion Record on the application for the appointment of Receiver;	0.25	\$575.00	\$143.75
2026-01-05	DTI	Correspondence with MPS regarding water leak. Review site inspection report. Phone call from a potential tenant, note information.	0.50	\$295.00	\$147.50
2026-01-05	PGE	Email exchange with Counsel; receipt and review of draft security opinion; email exchange between Receiver's Counsel and Counsel for BNS; receipt and review of Counsel comments on draft report; receipt and review of revised draft security opinion;	0.75	\$575.00	\$431.25
2026-01-05	PAM	Email exchange regarding payment of insurance premiums and coordination of new payment method.	0.30	\$425.00	\$127.50
2026-01-05	PAM	Email exchnages regarding leak in basement and approval of inspection to obtain quote.	0.20	\$425.00	\$85.00
2026-01-07	PGE	Email exchange between Patrick Leung and insurance broker regarding payment of premiums; internal email exchange with DT regarding issues raised regarding payment of insurance premiums;	0.30	\$575.00	\$172.50
2026-01-07	DTI	Review correspondence from insurance and debtor, discuss insurance and payment options. Correspondence with MPS and review payments.	0.50	\$295.00	\$147.50
2026-01-09	DTI	Correspondence with PGE and MPS regarding property. Correspondence with HUB regarding insurance.	0.30	\$295.00	\$88.50
2026-01-09	PGE	Email exchange with ppty manager regarding water leaking out of unit 204 and review of proposed remediation of same; telephone discussion with ppty manager n this regard;	0.50	\$575.00	\$287.50
2026-01-09	PAM	Receipt and review email from property management regarding update on leak with pictures and costs to repair. Discuss with D. Tiwana and approve repair.	0.20	\$425.00	\$85.00
2026-01-10	PGE	Email to Eugene Ngo at BNS requesting formal payout statement on Bank's debt; revisions to draft report to exclude distribution below the bank and discharge while Counsel deals with secured creditors junior to the senior security held by BNS;	2.00	\$575.00	\$1,150.00
2026-01-11	EST	Prepare documents as requested.	0.50	\$250.00	\$125.00

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July 11, 2026

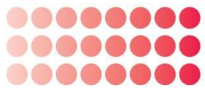
PAID**Invoice #:** 13165

Cameron Partners Ltd.

INVOICE

2026-01-11	PGE	Email to DT regarding service contracts; and payment of outstanding invoices from Counsel; minor revisions to report; review and execute revised fee affidavit; transmittal of draft to Counsel for review;	0.75	\$575.00	\$431.25
2026-01-12	CGL	Arranged first report to court's general and confidential appendices to be shared via OneDrive.	0.20	\$110.00	\$22.00
2026-01-12	PGE	Email exchange with Eugene Ngo at BNS; telephone discussion with Eugene and his replacement regarding formal payout statement; receipt and review of updated realty tax certificates; email to Counsel confirming acceptance of security opinion; minor revisions to First Report and transmittal to Counsel; assembly of all appendices and forwarding links to Counsel;	1.75	\$575.00	\$1,006.25
2026-01-12	GGO	Receive and review bank reconciliation.	0.10	\$425.00	\$42.50
2026-01-12	MSR	Preparing, reviewing the cheque requisitions getting the necessary back up documents reconciling the previous payments made. preparing list of Property management outstanding invoices and enquiring about status of rents received. Emailed received and reviewed from colleague regarding the status of payment to the legal counsel.	3.00	\$175.00	\$525.00
2026-01-13	PGE	Email from ppty manager re quotation for repair; t/c with DT in this regard; email from Counsel with details regarding ultimate purchaser;; responding email to Counsel regarding Assignment Agreement in lieu of a Direction re Funds in order to have the ultimate purchaser assume the obligations under the APS; receipt and review of BNS Payout Statement and forwarding same to Counsel; email exchange with insurance broker;	0.75	\$575.00	\$431.25
2026-01-13	DTI	Correspondence with M.Sarabi regarding unpaid invoices and requisitions for payment.	0.40	\$295.00	\$118.00
2026-01-14	PGE	Receipt and review of Assignment Agreement;	0.50	\$575.00	\$287.50

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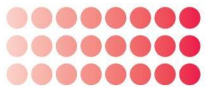
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2026-01-14	DTI	<i>Correspondence M.Sarabi regarding deposits and subsidized rents. Provide supporting documents. Review correspondence from insurance regarding property, request 3 pay plan. E-mail exchange with MPS regarding rent payment options for a tenant. Review quotes for work to be done and compare to past quotes. Request additional information.</i>	1.50	\$295.00	\$442.50
2026-01-15	PGE	<i>Email exchange with Counsel regarding finalizing Assignment Agreement and unwillingness of Purchaser to sign; telephone discussion with Counsel and ultimately resolving matter;</i>	0.50	\$575.00	\$287.50
2026-01-15	DTI	<i>Phone calls from tenants regarding snow clearing, contact plow company, correspond with MPS regarding snow and complaints received.</i>	0.50	\$295.00	\$147.50
2026-01-15	PAM	<i>Email exchanges regarding required repairs and quotes received from property management. Email exchanges regarding setting up snow plowing services.</i>	0.20	\$425.00	\$85.00
2026-01-16	CGL	<i>Review and edit final draft of report to court, finalize and send for approval.</i>	0.50	\$110.00	\$55.00
2026-01-16	PGE	<i>Forward Assignment Agreement to MMA for execution; transmittal of signed document to Counsel; receipt of final report from Counsel with Counsel revisions; transmittal of proposed final draft to MMA for review and signature; email exchange with ppty manager regarding heating system;</i>	0.50	\$575.00	\$287.50
2026-01-16	MMA	<i>Review and sign court report.</i>	0.30	\$575.00	\$172.50
2026-01-16	DTI	<i>Confirm snow clearing with company.</i>	0.10	\$295.00	\$29.50
2026-01-19	PGE	<i>Transmittal of completed report to Counsel; email exchange with Counsel regarding MLS Data Form;</i>	0.25	\$575.00	\$143.75
2026-01-19	DTI	<i>Correspondence from counsel, reach out to listing agent to request documents.</i>	0.20	\$295.00	\$59.00
2026-01-20	PGE	<i>Email exchanges with ppty manager regarding repair quotes;</i>	0.50	\$575.00	\$287.50

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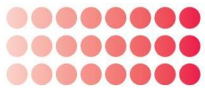
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2026-01-20	DTI	Correspondence with MPS regarding property and outstanding repairs, review quotes. Calls from tenants regarding snow and cleanliness of property.	0.40	\$295.00	\$118.00
2026-01-20	PAM	Email exchanges with property management regarding water leaks at property and providing notices to tenants and proceeding with repairs.	0.20	\$425.00	\$85.00
2026-01-22	MSR	Receipt, review and processing and coordinating with banking department.	1.00	\$175.00	\$175.00
2026-01-23	DTI	Review e-mails regarding repairs that need to be done, water leaks in property, call from tenant regarding snow clearing, and water leak. Get approval for work to be done.	1.00	\$295.00	\$295.00
2026-01-26	DTI	Correspondence with tenant regarding snow, water leaks. discuss property, sale timeline.	0.40	\$295.00	\$118.00
2026-01-26	PGE	Receipt and review of draft Notice of Motion, AVO and Ancillary Order; responding email to Counsel;	0.50	\$575.00	\$287.50
2026-01-27	DTI	Calls and e-mails with maximum, snow plowing and tenants regarding snow and water leaks.	0.50	\$295.00	\$147.50
2026-01-27	PGE	Email exchange with ppty manager regarding plumbing repairs and snow removal;	0.20	\$575.00	\$115.00
2026-01-28	DTI	Work on Rent roll and reconciliations.	4.00	\$295.00	\$1,180.00
2026-01-28	PGE	Email from ppty manager regarding snow removal; email from Receiver's Counsel confirming approval of draft AVO by Counsel for Purchaser; email from insurance broker;	0.20	\$575.00	\$115.00
2026-01-29	DTI	Work on reconciling rents roll, review receipts since inception of receivership. Prepare chart, contact Maximum to confirm vacancy for units.	4.00	\$295.00	\$1,180.00
2026-01-29	PGE	Email exchange with Counsel; email from ppty manager;	0.20	\$575.00	\$115.00
2026-01-30	MMA	Receipt and review documents and approve payables.	1.10	\$575.00	\$632.50
2026-01-30	DTI	Gather and organize supporting documents for rent receipts, work on deposit requisitions.	1.00	\$295.00	\$295.00

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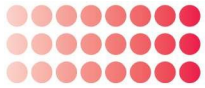
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2026-01-30	PGE	Further review of Draft Auxiliary Order and NOM; revise and transmit to Counsel; responding emails from Counsel in this regard; email from ppty manager; email from listing broker regarding updated utility numbers and rent roll;	0.75	\$575.00	\$431.25
2026-01-30	CGL	Administrative work including the review of accounts, arrange approval of payables.	0.50	\$110.00	\$55.00
2026-02-02	DTI	Work on Deposit requisitions for Rents. Update rent roll for February.	1.80	\$295.00	\$531.00
2026-02-03	DTI	Work on Deposit requisitions for rent receipts.	0.50	\$295.00	\$147.50
2026-02-04	DTI	Work on deposit requisitions.	1.50	\$295.00	\$442.50
2026-02-05	DTI	Prepare deposit requisitions for Feb rents. Correspondence with MPS regarding various repairs for the building.	1.00	\$295.00	\$295.00
2026-02-05	PGE	Email exchange with Counsel regarding request from Debtor for disclosure of unredacted APS and need for Confidential Undertaking; email exchange with ppty manager regarding repairs; calls with Counsel;	0.80	\$575.00	\$460.00
2026-02-06	DTI	Prepare deposit requisitions.	0.50	\$295.00	\$147.50
2026-02-06	PAM	Various email exchnages with property management regarding repairs required at the property.	0.20	\$425.00	\$85.00
2026-02-09	DTI	Call with listing agent, review rent roll and provide updated information regarding property, income and expenses to listing agent, correspond with MPS to follow up with tenants regarding rent and occupancy.	1.50	\$295.00	\$442.50
2026-02-11	PGE	Email exchange with listing broker regarding information needed for sales process;	0.20	\$575.00	\$115.00
2026-02-12	GGO	Receive and review December bank reconciliation.	0.10	\$425.00	\$42.50
2026-02-17	DTI	Correspondence from insurance, investigate payment, correspondence with snow plowing and MPS regarding property.	0.50	\$295.00	\$147.50
2026-02-17	PGE	Receipt and review of Factum for AVO motion; email from Debtor; email exchange with ppty manager regarding repairs ordered by the City; email exchange with Hub International regarding premium arrears;	0.30	\$575.00	\$172.50
2026-02-17	MSR	Receipts, receive, review and processing and coordinating with banking department.	0.50	\$175.00	\$87.50

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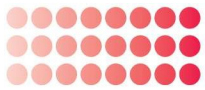
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2026-02-18	MMA	Receipt and review of email exchanges with P. Leung and P. Gennis regarding re-financing and applications.	0.20	\$575.00	\$115.00
2026-02-18	DTI	Correspondence with MPS and city. Review e-mails and forward approval for repairs.	0.40	\$295.00	\$118.00
2026-02-18	PGE	Email from Debtor in response to court materials; email to Counsel requesting a response to Debtor's email; telephone discussion with Counsel in this regard;	0.50	\$575.00	\$287.50
2026-02-19	DTI	Follow up with MPS regarding the repairs.	0.10	\$295.00	\$29.50
2026-02-19	PGE	Email exchange with ppty manager regarding repairs mandated by the City;	0.10	\$575.00	\$57.50
2026-02-22	PGE	Email to Counsel requesting zoom link for AVO hearing; email from Counsel for Debtor confirming that Debtor will not be opposing AVO relief; internal exchange with MMA in this regard; follow-up email to DT regarding prior requests from listing broker; email exchange with Bank;	0.75	\$575.00	\$431.25
2026-02-23	MMA	Receipt and review of email exchanges with P. Gennis and BNS regarding sales process, payout letter and current accounts.	0.30	\$575.00	\$172.50
2026-02-23	PGE	Email from Counsel enclosing zoom link for AVO hearing; email exchange with Counsel regarding draft of response to Debtor's email previously received; email from DT confirming a response to listing broker's earlier email; email from insurance broker;	0.50	\$575.00	\$287.50
2026-02-24	DTI	Review correspondence from counsel regarding sale of property, draft notice and contact MPS to provide notice to all tenants requesting proof of LMR, reach out to previous property management to request additional information.	1.40	\$295.00	\$413.00
2026-02-24	MMA	Receipt and review of email exchanges with P. Gennis and BNS regarding sale approval order and court's decision. Receipt and review of counsel's accounts.	0.60	\$575.00	\$345.00

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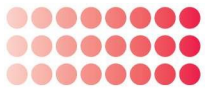
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2026-02-24	PGE	Email from Counsel confirming successful conclusion to AVO hearing; email to ppty manager with draft notice to tenants regarding LMR; email from Receiver's Counsel to Debtor's former ppty manager regarding LMR; email exchange with BNS confirming granting of AVO and ancillary order; receipt and review of payout statement from Bank; email to former ppty manager; receipt and review of court orders granted at AVO hearing; email from Counsel requesting updated rent roll and evidence of LMR paid by tenants; forwarding email to DT for action and response;	1.50	\$575.00	\$862.50
2026-02-25	DTI	Review correspondence from counsel and PGE regarding sale of property and last months rent, correspondence from tenants regarding notices received, correspondence with CMHA, correspondence from Hood management and acocuntant for last months rent, review and discuss with PGE. Prepare deposit requisitions, update PAM regarding file and tenants, LMR. Request MPS deliver notices of rent default to certain tenants.	1.80	\$295.00	\$531.00
2026-02-25	PGE	Email from ppty manager confirming impending posting of tenant notices; email exchange with Windsor CMHA regarding LMR paid by subsidized tenants; email exchange with ppty manager regarding rent arrears; receipt of LMR schedule from former ppty manager and transmittal of same to Counsel; further email exchange with Counsel regarding evidence of LMR and suggestion that Counsel reach out to the Debtor; email exchange between Receiver's Counsel and Debtor;	1.25	\$575.00	\$718.75
2026-02-26	PGE	Email from Receiver's Counsel to former ppty manager; email exchange with ppty manager regarding action to be taken with respect to rental arrears;	0.30	\$575.00	\$172.50
2026-02-27	DTI	Correspondence with MPS regarding property and outstanding rents from tenants.	0.20	\$295.00	\$59.00
2026-02-27	PGE	Receipt and review of draft Default Notices prepared by ppty manager; email to Counsel regarding Default Notices; email from ppty manager confirming completion of work required by the City; email from Debtor to his former ppty manager;	0.75	\$575.00	\$431.25
2026-03-01	PGE	Email from Debtor regarding LMR details.	0.10	\$575.00	\$57.50
2026-03-02	MMA	Review accounts and approve payables.	0.30	\$575.00	\$172.50

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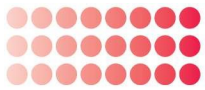
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2026-03-02	PGE	Email from Receiver's Counsel requesting updated rent roll; email from ppty manager regarding posting of Notices of Default;	0.20	\$575.00	\$115.00
2026-03-02	CGL	Administrative work including the review of accounts and arrange approval of payables.	0.20	\$110.00	\$22.00
2026-03-02	MSR	Email, received, reviewed and responded to from colleague regarding payment to snow removal contractor, received and reviewed invoice prepared cheque requisitions submitted for review and approval.	0.50	\$175.00	\$87.50
2026-03-03	PGE	Email from Debtor to former ppty manager regarding LMR details; email exchange between Counsel and Debtor; email exchange between Counsel for Receiver and Counsel for Purchaser; internal email to DT regarding LMR; email exchange with former ppty manager; email exchange with Counsel regarding BC corporation holding "purported" second mortgage on ppty; email from Receiver's Counsel to Counsel for Purchaser enclosing AVO; email from Listing Broker regarding Purchaser's request to extend closing to March 19th or 26th; telephone discussion with Receiver's Counsel; email exchange with Receiver's Counsel confirming Receiver's willingness to extend to March 19th; email to listing broker in this regard;	1.30	\$575.00	\$747.50
2026-03-03	PAM	Email exchange regarding extension of closing of sale of property.	0.10	\$425.00	\$42.50
2026-03-04	DTI	Review correspondence from listing agent and counsel regarding sale of property.	0.20	\$295.00	\$59.00
2026-03-04	PGE	Internal email from PA enclosing rent roll for property; email forwarding rent roll to Counsel; email exchange between Receiver's Counsel and Counsel for Purchaser regarding closing date for transaction;	0.30	\$575.00	\$172.50
2026-03-04	MSR	Multiple receipts, review and processing, updating the rent roll, reconciling previous payments made and coordinating with banking department to process the requisitions.	1.00	\$175.00	\$175.00
2026-03-04	PAM	Review rents collected to date and prepare rent roll.	1.50	\$425.00	\$637.50
2026-03-05	PGE	Receipt and review of corporate profile for BC corporation holding purported second mortgage; telephone discussion with Counsel in this regard;	0.25	\$575.00	\$143.75

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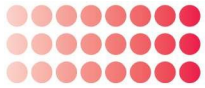
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2026-03-06	PGE	Further email exchange between Receiver's Counsel and Counsel for Purchaser regarding extension request; negotiations regarding additional deposit in consideration for the extension; telephone discussions with Receiver's Counsel in this regard;	0.75	\$575.00	\$431.25
2026-03-07	PGE	Email exchange with Listing Broker regarding tenant acknowledgements; telephone discussion with broker in this regard;	0.50	\$575.00	\$287.50
2026-03-09	MMA	Receipt and review of email exchanges with P. Gennis and J. Moliere (Scotiabank) regarding closing of sale.	0.30	\$575.00	\$172.50
2026-03-09	PGE	Email from ppty manager regarding tenant acknowledgements; email from Bank regarding timing of payout post-closing; email exchange with Bank regarding timing of payout; telephone discussion with Bank in this regard; internal email to banking requesting wire transfer coordinates for receivership account;	0.75	\$575.00	\$431.25
2026-03-10	PGE	Email exchange between Listing Broker and Enwin Utilities regarding access to the building; email exchange between ppty manager and Enwin; email exchange with banking regarding wire transfer coordinates for sale proceeds; email exchange between Receiver's Counsel and Debtor;	0.75	\$575.00	\$431.25
2026-03-10	PAM	Review cheque requisitions prepared by others.	0.30	\$425.00	\$127.50
2026-03-11	CGL	Upload court document to case website.	0.10	\$110.00	\$11.00
2026-03-12	PGE	Email exchange with Counsel for Purchaser; receipt and execution of Disclosure Information Consent Form re Enwin Utilities;	0.60	\$575.00	\$345.00
2026-03-13	GGO	Receive and review January bank reconciliation.	0.10	\$425.00	\$42.50
2026-03-13	PGE	Email to Purchaser's Counsel enclosing Enwin Consent Form and fully executed Assignment and Assumption of APS and fully executed APS; email from Counsel for Purchaser enclosing tax and water certificates for ppty; multiple emails from Debtor; telephone discussion with listing broker;	0.75	\$575.00	\$431.25
2026-03-16	PAM	Review e-transfers received and update rent roll and forward to P. Gennis for review.	0.70	\$425.00	\$297.50
2026-03-16	PGE	Email exchange between Receiver's Counsel and Counsel for Purchaser regarding statement of adjustments; internal email exchange with PA regarding updated rent roll; receipt and review of draft closing documents;	0.75	\$575.00	\$431.25

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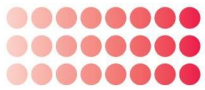
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2026-03-17	DTI	<i>Review correspondence from counsel, attend to queries, review file and reconcile rents received, prepare deposit requisitions, discussions with MPS regarding unpaid rents, review correspondence between ODSP and MPS. Discussion with MPS regarding access for Enwin.</i>	3.00	\$295.00	\$885.00
2026-03-17	PGE	<i>Email from PA enclosing updated rent roll; and forwarding same to Counsel; receipt and review of draft Statement of Adjustments; email to Counsel with commentary on updated rent roll; email exchange with ppty manager; receipt and review of further revised SOA; transmittal of SOA to Counsel for Purchaser; email exchange with Counsel regarding HST applicability; email exchange with Counsel regarding SOA and revisions to same if needed;</i>	1.25	\$575.00	\$718.75
2026-03-18	DTI	<i>Various e-mails with counsel regarding sale, review statement of adjustments.</i>	0.70	\$295.00	\$206.50
2026-03-18	PGE	<i>Email exchange with listing broker regarding short on the deposit; email to Counsel in this regard; telephone discussions with listing broker and with Counsel regarding deposit and the need to further revise SOA; review of revised closing documents and arranging for transmittal of same to MMA for signature; email exchange with Receiver's Counsel regarding Purchaser's request for a further extension and the need for an additional non-refundable deposit;</i>	2.20	\$575.00	\$1,265.00
2026-03-19	PGE	<i>Receipt of request from purchaser to extend closing to March 23rd; telephone discussion with Counsel in this regard; email exchange regarding obtaining additional non-refundable deposit as consideration for extension request;</i>	0.75	\$575.00	\$431.25
2026-03-20	PGE	<i>Email exchange with Receiver's Counsel confirming receipt of additional \$50K deposit; telephone discussion with Counsel in this regard; telephone discussion with listing broker confirming closing extension and receipt of additional deposit</i>	0.25	\$575.00	\$143.75
2026-03-21	MMA	<i>Receipt and review of email exchange with P. Gennis and J. Moliere (Scotiabank) regarding extension for closing.</i>	0.20	\$575.00	\$115.00
2026-03-21	PGE	<i>Receipt and review of payout statement from BNS and transmittal of same to Counsel; email to BNS regarding closing extension to March 23rd and securing of additional deposit as a condition of same; email to ppty manager regarding rent arrears and service of Notices of Termination on delinquent tenants;</i>	1.10	\$575.00	\$632.50

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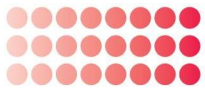
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2026-03-22	MMA	Receipt and review of email exchange with P. Gennis and J. Moliere (Scotiabank) regarding extension for closing.	0.20	\$575.00	\$115.00
2026-03-22	PGE	Email from BNS in response to email from Receiver; receipt and review of further amended SOA;	0.30	\$575.00	\$172.50
2026-03-23	CGL	Uploaded court documents to case website.	0.30	\$110.00	\$33.00
2026-03-23	MMA	Receipt and review of email exchange with P. Gennis and J. Moliere (BNS) regarding closing of sale.	0.20	\$575.00	\$115.00
2026-03-23	PGE	Email exchange with Counsel regarding rent roll and termination notices served on 2 tenants in arrears; further emails regarding delivery of keys; email exchange with Counsel confirming receipt of closing proceeds; email exchange with BNS confirming closing;	0.75	\$575.00	\$431.25
2026-03-23	DTI	Review correspondence from counsel regarding sale of building, provide supporting documentation regarding rents, defaults, notices to tenants. Update rent roll. Various e-mails with counsel and Maximum regarding closing, coordinate handover of keys.	1.50	\$295.00	\$442.50
2026-03-23	MSR	Multiple emails received and reviewed from legal counsel and colleagues regarding the closing affairs of the property.	0.20	\$175.00	\$35.00
2026-03-24	MMA	Receipt and review of email exchanges with P. Gennis and J. Moliere (BNS) regarding payout details, review payout letter.	0.40	\$575.00	\$230.00
2026-03-24	PGE	Email exchange with Counsel confirming registration of AVO; email from ppty manager regarding delivery of keys; telephone discussion with Counsel regarding communication with subsequent secured creditors and next motion to Court for discharge; email exchange with Bank; telephone discussion with Jason Moliere at BNS regarding proposed final distribution to BNS by March 30th; internal email to DT regarding accelerated distribution to BNS; transmittal of wire transfer coordinates to Counsel; email to DT regarding transfer of deposit funds into receivership account;	1.20	\$575.00	\$690.00
2026-03-24	DTI	Correspondence with various services regarding sale of property, request final bills.	0.50	\$295.00	\$147.50
2026-03-25	PGE	Email exchange between Counsel and Patrick Leung; internal email exchange with DT regarding wire transfer to BNS;	0.25	\$575.00	\$143.75

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July 11, 2026

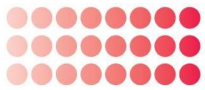
PAID**Invoice #: 13165**

Cameron Partners Ltd.

INVOICE

2026-03-26	PGE	Email from Receiver's Counsel to Debtor and his Counsel; email to listing broker confirming closing; receipt and review of commission invoice from Listing Broker and transmittal internally for processing; email exchange between Counsel and Patrick Leung;	0.50	\$575.00	\$287.50
2026-03-26	DTI	Review sale and closing documents, request additional documents required.	0.50	\$295.00	\$147.50
2026-03-27	DTI	E-mails with Housing Information Services regarding rents and auto payments, inform of sale of property, contact information for purchaser's counsel. Correspond with Insurance to terminate insurance policy and request any refunds. E-mails with counsel. Review invoices from MPS. E-mails with Avison Young confirming sale.	1.20	\$295.00	\$354.00
2026-03-30	PGE	Email exchange with Counsel regarding SOA and Trust Statement; receipt and review of trust statement in advance of interim distribution to the Bank; email exchange with Counsel regarding statement of adjustments and trust statement;	0.50	\$575.00	\$287.50
2026-03-30	DTI	Correspondence with counsel regarding sale, review trust ledger and sale documents, work on reconciling accounts. Review invoice regarding snow clearing for March.	0.20	\$295.00	\$59.00
2026-03-31	PGE	Email from BNS;	0.10	\$575.00	\$57.50
2026-04-01	DTI	Correspondence with counsel regarding sale documents. Prepare deposit requisitions and work on disbursement schedule.	1.00	\$295.00	\$295.00
2026-04-04	PGE	Receipt and review commission statement from listing broker;	0.10	\$575.00	\$57.50
2026-04-06	DTI	Prepare updated SRD, work on interim distribution amounts, review court orders and receiver's report, review file and follow up to gather all outstanding invoices for various vendors.	2.00	\$295.00	\$590.00
2026-04-06	PGE	Review and approve payables; email exchange with BNS regarding interim distribution; email from Patrick Leung;	0.30	\$575.00	\$172.50

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July 11, 2026

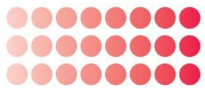
PAID**Invoice #:** 13165

Cameron Partners Ltd.

INVOICE

2026-04-07	PGE	Receipt and review of draft Interim SRD and Proposed Distribution to BNS;	0.50	\$575.00	\$287.50
2026-04-07	DTI	Correspondence with PGE, update SRD and payout.	0.40	\$295.00	\$118.00
2026-04-08	PGE	Email exchange with Counsel regarding proposed final distribution to BNS and issues relating to second mortgage and other security interest registered on title; email exchange between Receiver's Counsel and Counsel who registered second mortgage on title; email exchange with Indcom regarding Notice of Security Interest registered on title and the vesting out thereof;	0.75	\$575.00	\$431.25
2026-04-08	EST	Prepare 246(2) report; fax to OSB	0.30	\$250.00	\$75.00
2026-04-08	MMA	Review, edit and approve 246(2) report	0.30	\$575.00	\$172.50
2026-04-08	MSR	Email, received and reviewed regarding the outstanding invoice.	0.10	\$175.00	\$17.50
2026-04-09	PGE	Email from Receiver's Counsel to representative for BC Corp.as second mortgagee requesting statement and evidence of advances; email exchange with other Counsel for BC Corp.,; email to Counsel outlining proposed steps to be taken regarding obtaining information from 2nd mortgagee;	0.50	\$575.00	\$287.50
2026-04-10	DTI	Call with ODSP regarding sums received, discuss sale of property, where to direct rents, discuss other units, review rent roll.	0.50	\$295.00	\$147.50
2026-04-10	PGE	Review and approve distribution to BNS; email exchange with Jason Moliere at BNS; receipt and transmittal of wire transfer confirmation;	0.25	\$575.00	\$143.75
2026-04-10	MSR	Prepared, reviewed multiple deposit requisitions, reconciled previous payment received and coordinating with banking department.	1.00	\$175.00	\$175.00
2026-04-13	DTI	Correspondence with All In regarding outstanding invoices, review final bills.	0.20	\$295.00	\$59.00
2026-04-13	GGO	Receive and review February bank reconciliation.	0.10	\$425.00	\$42.50
2026-04-13	PGE	Email from Counsel enclosing copy of email with correspondence to Counsel for Patrick Leung;	0.20	\$575.00	\$115.00
2026-04-14	PGE	Email from Counsel regarding named director of BC Corp.	0.10	\$575.00	\$57.50
2026-04-15	DTI	Review e-mails from counsel regarding property and utilities, review Enwin accounts.	0.30	\$295.00	\$88.50

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July 11, 2026

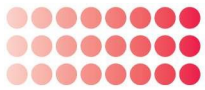
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Cameron Partners Ltd.

INVOICE

2026-04-16	DTI	Review file, call with Enbridge regarding account closure, review correspondence with Enwin.	0.40	\$295.00	\$118.00
2026-04-16	MSR	Email, received and reviewed from utility company regarding the closing of utility accounts.	0.20	\$175.00	\$35.00
2026-04-17	PGE	Email exchange between Receiver's Counsel and Counsel for Purchaser regarding Enwin;	0.20	\$575.00	\$115.00
2026-04-17	CGL	Administrative work including the review of accounts and arrange approval of payables.	0.20	\$110.00	\$22.00
2026-04-17	DTI	Review bills and utility accounts, calls with Enwin, correspond with counsel to request purchaser to set up accounts, review file for closing.	1.50	\$295.00	\$442.50
2026-04-20	PGE	Email exchange and telephone call with Receiver's Counsel; email exchanges between Receiver's Counsel and parties connected with the second mortgagee;	0.50	\$575.00	\$287.50
2026-04-20	MMA	Review accounts and approve payables.	0.30	\$575.00	\$172.50
2026-04-21	MSR	Prepared and reviewed multiple cheque requisition and discussion with colleague regarding the enwin accounts water and utilities. Phone call with enwin representative discussed the closing of accounts.	3.00	\$175.00	\$525.00
2026-04-22	DTI	Phone and e-mail changes with P.Gennis and M.Sarabi. Review confirmation of Enwin accounts from counsel, review enwin accounts.	0.40	\$295.00	\$118.00
2026-04-22	PGE	Email from Counsel for Purchaser; email from listing broker; email from Counsel; review and approve payables;	0.30	\$575.00	\$172.50
2026-04-27	PGE	Email from Hub International Insurance Brokers; internal discussion with DH in this regard;	0.20	\$575.00	\$115.00
2026-04-27	DTI	Review e-mail from insurance, call with insurance company to discuss cancellation, review matter with PGE.	0.40	\$295.00	\$118.00
2026-04-28	PGE	Preliminary drafting of second report to court for distribution of remaining sale proceeds and discharge;	2.00	\$575.00	\$1,150.00
2026-04-30	DTI	Correspondence with CMHA, review rent rolls and payments received. Review e-mails and outstanding payments for utilities and services.	0.80	\$295.00	\$236.00
2026-04-30	PGE	Email exchanges with Windsor-Essex County division of CMHA regarding diversion of April rent payments;	0.20	\$575.00	\$115.00

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July 11, 2026

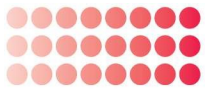
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Cameron Partners Ltd.

INVOICE

2026-05-01	PGE	Email exchange regarding misdirected rent payment;	0.20	\$575.00	\$115.00
2026-05-01	DTI	Correspondence with CMHA regarding rents received.	0.40	\$295.00	\$118.00
2026-05-01	MSR	Receipts review and processing and coordinating with banking department.	0.60	\$175.00	\$105.00
2026-05-04	PGE	Further email exchange regarding misdirected rent payments post-closing;	0.10	\$575.00	\$57.50
2026-05-05	DTI	E-mails with CAMH, call and e-mail ODSP, review documents regarding rent payments. Review bank account and identify receipts.	1.20	\$295.00	\$354.00
2026-05-05	PGE	Email exchange with Counsel regarding second mortgagee and requesting correspondence in this regard; email exchanges regarding misdirected rent;	0.50	\$575.00	\$287.50
2026-05-06	GGO	Receive and review March reconciliation.	0.10	\$425.00	\$42.50
2026-05-06	MSR	Prepared and reviewed multiple cheque requisitions and submitted for review.	0.50	\$175.00	\$87.50
2026-05-07	MMA	Review documents and approve payables.	0.40	\$575.00	\$230.00
2026-05-07	MSR	Submitted the cheque requisitions for approval.	0.10	\$175.00	\$17.50
2026-05-12	CGL	Administrative work including the review of accounts, prepare and arrange approval of payables.	0.50	\$110.00	\$55.00
2026-05-12	MMA	Review accounts and approve payables.	0.30	\$575.00	\$172.50
2026-05-13	DTI	Call with Abell Pest Control regarding account, review invoices and reconcile amounts due. Correspond with insurance regarding premiums and cancellation.	1.00	\$295.00	\$295.00
2026-05-14	MMA	Review accounts and approve payable.	0.30	\$575.00	\$172.50
2026-05-14	MSR	Preparing, reviewing multiple cheque requisitions to process outstanding utility account payments pest control and discussion with colleague regarding closing of utility accounts.	1.00	\$175.00	\$175.00
2026-05-14	PAM	Review requisitions prepared by others.	0.20	\$425.00	\$85.00
2026-05-25	PGE	Email exchange with Receiver's Counsel regarding correspondence to Counsel for second mortgagee; review of draft correspondence;	0.50	\$575.00	\$287.50
2026-05-26	PGE	Email from HUB regarding cancellation of insurance post-closing;	0.10	\$575.00	\$57.50

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July 11, 2026

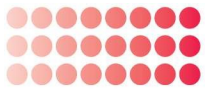
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Invoice #: 13165

Cameron Partners Ltd.

INVOICE

2026-05-27	MMA	<i>Receipt and review of email from P. Leung regarding refinancing update. Receipt and review of email exchanges with P. Gennis, J. Quigley & I. Klaiman (SZK Law) regarding letter for second mortgage and payments sent to BNS.</i>	0.50	\$575.00	\$287.50
2026-05-27	PGE	<i>Emails from Patrick Leung; email exchange and telephone discussions with Counsel; review of draft correspondence to Counsel for 2nd mortgagee; email exchanges between Receiver's Counsel and Patrick Lweung;</i>	1.25	\$575.00	\$718.75
2026-05-28	MSR	<i>Time previously worked but not accounted for related to 13 May 2026 Email, received and reviewed from colleague regarding the outstanding invoices of pest control contractor.</i>	0.20	\$175.00	\$35.00
Professional Services Total:			132.90		\$54,162.00
Reimbursable Expenses					
2025-12-01	NTA				\$32.73
2026-01-23	EMA				\$8.00
Reimbursable Expenses Total:			2.00		\$40.73



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August 19, 2026

PAID

Invoice #: 13221

Cameron Partners Ltd.

INVOICE

RE: Cameron Partners Ltd.

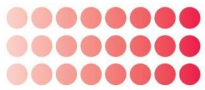
PROFESSIONAL FEES to July 31, 2026

Professional Services	Hours	Hourly Rate	Total
Mukul Manchanda, CPA, CIRP, LIT	0.30	\$575.00	\$172.50
Philip H. Gennis, LL.B., CIRP, LIT	12.80	\$575.00	\$7,360.00
Gillian Goldblatt, CPA, CA, CIRP, LIT	0.20	\$425.00	\$85.00
Paula Amaral	0.20	\$425.00	\$85.00
Eileen Sturge	0.70	\$250.00	\$175.00
Manocher Sarabi	2.00	\$175.00	\$350.00
Cassandra Glover	0.50	\$110.00	\$55.00
Total Professional Services	16.70	\$495.96	\$8,282.50
HST			\$1,076.73

Reimbursable Expenses	Total
Courier	\$14.91
Total Reimbursable Expenses	\$14.91
HST on expenses	\$1.94

Total **\$9,376.08**

HST Registration #R103478103
(AACAME-R)

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August 19, 2026

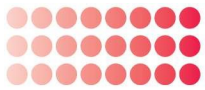
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Cameron Partners Ltd.

INVOICE**INVOICE RECONCILIATION PAGE**

Date	Staff	Memo	Hours	B-Rate	Amount
Professional Services					
2026-06-01	PGE	Email from Counsel enclosing closing documents; email from Counsel enclosing mortgage statement from second mortgagee; review of statement and response to Counsel; email from insurance broker;	0.75	\$575.00	\$431.25
2026-06-02	PGE	Further review of payout statement supplied by second mortgagee; email to, Counsel outlining Receiver's position in this regard; opinion from senior Counsel for the Receiver supporting the position adopted by the Receiver and recommending further correspondence to Counsel for second mortgagee; email exchange with Counsel;	1.25	\$575.00	\$718.75
2026-06-09	PGE	Email to Counsel regarding update on correspondence to Counsel for second mortgagee;	0.10	\$575.00	\$57.50
2026-06-10	PGE	Receipt and review of correspondence from Receiver's Counsel to Counsel for second mortgagee; receipt and review of opposing Counsel responses;	0.30	\$575.00	\$172.50
2026-06-11	GGO	Receive and review April bank reconciliation.	0.10	\$425.00	\$42.50
2026-06-11	PGE	Email from Counsel confirming current WIP;	0.10	\$575.00	\$57.50
2026-06-18	PGE	Email from Counsel forwarding further email from Counsel for second mortgagee;	0.20	\$575.00	\$115.00
2026-06-23	MSR	Prepared reviewed multiple cheque requisitions to process payments for utilities and contractors for both properties.	2.00	\$175.00	\$350.00
2026-07-03	PGE	Email exchange with Receiver's Counsel regarding impending distribution and discharge motion; telephone discussion with Counsel;	0.40	\$575.00	\$230.00
2026-07-11	EST	Prepare documents as requested; enter into Ascend for processing	0.70	\$250.00	\$175.00
2026-07-14	GGO	Receive and review May bank reconciliation.	0.10	\$425.00	\$42.50
2026-07-14	PGE	Email to Counsel;	0.10	\$575.00	\$57.50
2026-07-20	PGE	Email from Insurance Company regarding o/s premium;	0.10	\$575.00	\$57.50
2026-07-21	PAM	Review cheque requisition prepared by others.	0.10	\$425.00	\$42.50
2026-07-22	MMA	Review accounts and approve payables.	0.30	\$575.00	\$172.50

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August 19, 2026

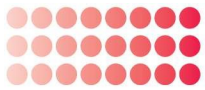
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Invoice #: 13221

Cameron Partners Ltd.

INVOICE

2026-07-22	PAM	Review cheque requisitions.	0.10	\$425.00	\$42.50
2026-07-23	CGL	Administrative work including the review of accounts, preparation of and arrange approval of payables.	0.30	\$110.00	\$33.00
2026-07-24	PGE	Email exchange with Counsel regarding court report; receipt and review of draft NOM; review of GL and WIP report for file;	0.75	\$575.00	\$431.25
2026-07-27	CGL	Administrative work including preparing billing and account reports.	0.20	\$110.00	\$22.00
2026-07-27	PGE	Email exchanges with Counsel regarding timing of draft report; review of GL and unbilled WIP reports; review of payout statement provided by Counsel for second mortgagee; drafting Second Report to Court and transmittal to Counsel for review;	4.25	\$575.00	\$2,443.75
2026-07-28	PGE	Email exchange with Counsel; further revisions to Court Report and transmittal of V2 to Counsel;	1.25	\$575.00	\$718.75
2026-07-29	PGE	Receipt and review of Counsel revisions to V2 of Second Report;	0.50	\$575.00	\$287.50
2026-07-30	PGE	Email from Counsel with proposed attachment to report;	0.25	\$575.00	\$143.75
2026-07-31	PGE	Receipt and review of further Counsel revisions to Second Report; further drafting to accommodate proposed revisions;	2.50	\$575.00	\$1,437.50
Professional Services Total:			16.70		\$8,282.50
Reimbursable Expenses					
2026-06-01	NTA				\$14.91
Reimbursable Expenses Total:			1.00		\$14.91



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September 20, 2026

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Invoice #: 1450

Cameron Partners Ltd.

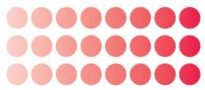
INVOICE

RE: Cameron Partners Ltd.

PROFESSIONAL FEES to September 30, 2026.

Professional Services	Hours	Hourly Rate	Total
Philip H. Gennis, LL.B., CIRP, LIT	8.35	\$575.00	\$4,801.25
Gillian Goldblatt, CPA, CA, CIRP, LIT	0.20	\$425.00	\$85.00
Eileen Sturge	1.20	\$250.00	\$300.00
Cassandra Glover	0.20	\$110.00	\$22.00
Total Professional Services	9.95	\$523.44	\$5,208.25
HST			\$677.07
Total			\$5,885.32

HST Registration #R103478103
(AACAME-R)



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September 20, 2026

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Invoice #: 1450

Cameron Partners Ltd.

INVOICE

INVOICE RECONCILIATION PAGE

Date	Staff	Memo	Hours	B-Rate	Amount
Professional Services					
2026-08-07	GGO	Receive and review June bank reconciliation.	0.10	\$425.00	\$42.50
2026-08-11	PGE	Final revisions to Second Report; transmittal of V2 draft to Counsel; internal email to ES requesting updated SRD;	1.25	\$575.00	\$718.75
2026-08-21	EST	Prepare documents as requested; enter into Ascend for processing	0.70	\$250.00	\$175.00
2026-08-25	PGE	Email exchange and telephone discussion with Receiver's Counsel;	0.30	\$575.00	\$172.50
2026-09-04	PGE	Email exchange with Receiver's Counsel;	0.20	\$575.00	\$115.00
2026-09-08	GGO	Receive and review July bank reconciliation.	0.10	\$425.00	\$42.50
2026-09-09	PGE	Email to Counsel;	0.10	\$575.00	\$57.50
2026-09-14	PGE	Email from Counsel with proposed revisions to Court Report; review of proposed revisions;	0.50	\$575.00	\$287.50
2026-09-16	PGE	Review of WIP and GL; preparation of SRD; finalize report and assemble appendices and transmittal of complete report to Counsel for inclusion in Motion Record;	2.75	\$575.00	\$1,581.25
2026-09-24	PGE	Review of draft Discharge Order; email exchange with Counsel regarding date for Discharge Hearing and details of zoom link for same; receipt and review of Motion Record served today;	0.75	\$575.00	\$431.25
2026-09-25	CGL	Upload court documents to case website.	0.20	\$110.00	\$22.00
2026-09-30	PGE	Email from Debtor; Email exchange and telephone discussion with Receiver's Counsel regarding need for an updated fee affidavit and Supplementary Report; review and execution of updated Fee Affidavit; drafting and execution of Supplementary Report and transmittal to Counsel for service;	2.50	\$575.00	\$1,437.50
2026-09-30	EST	Prepare documents are requested.	0.50	\$250.00	\$125.00
Professional Services Total:			9.95		\$5,208.25

Title	AACAME-R Fee affidavit to Sep 30 26
File name	AACAME-R_Fee_Affidavit_to_Sep_30_26.pdf
Document ID	bc3a5399c3d9ed2f52fb38d7b3917add1d071d71
Audit trail date format	MM / DD / YYYY
Status	● Signed

Document history

 SENT	09 / 30 / 2026 15:47:20 UTC-4	Sent for signature to Phil Gennis (pgennis@spergel.ca) from msispergelinc@gmail.com IP: 173.239.20.220
 VIEWED	09 / 30 / 2026 16:21:04 UTC-4	Viewed by Phil Gennis (pgennis@spergel.ca) IP: 173.239.20.220
 SIGNED	09 / 30 / 2026 16:21:51 UTC-4	Signed by Phil Gennis (pgennis@spergel.ca) IP: 173.239.20.220
 COMPLETED	09 / 30 / 2026 16:21:51 UTC-4	The document has been completed.

APPENDIX “3”

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N :

THE BANK OF NOVA SCOTIA

Applicant

- and -

CAMERON PARTNERS LTD.

Respondent

AFFIDAVIT OF IAN KLAIMAN

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

1. I am a lawyer with the law firm of Spetter Zeitz Klaiman PC (“**SZK**”), lawyers for msi Spergel Inc. (the “**Receiver**”) in its capacity as receiver appointed, without security, over all property, assets and undertakings of the Respondent and as such have knowledge of the matters to which I hereinafter depose. I verily believe to be true all matters that I depose to which I do not have first-hand knowledge of based on my review of the file.

2. Now produced and shown to me and marked as **Exhibit “A”** to this my Affidavit is a true copy of all accounts issued by SZK to the Receiver for the period between January 15, 2026, and September 30, 2026, totalling \$42,219.58.

3. I am advised by the lawyers who docketed time on this matter and believe that the dockets reflect the services provided by SZK in this matter and the fees and disbursements claimed by it.

4. I submit that the hourly rates charged are reasonable and comparable with other law firms within the City of Toronto of equivalent competence and expertise in the bankruptcy area.

SWORN BEFORE ME by video
teleconference at the City of Toronto, in the
Province of Ontario on the 30th day of
September 2026, in accordance with O. Reg.
431/20, Administering Oath or Declaration
Remotely

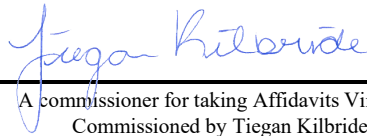


TIEGAN KILBRIDE
LSO No. P17363



IAN KLAIMAN

This is **Exhibit “A”** referred to
in the Affidavit of Ian Klaiman
Sworn before me this 30th
Day of September, 2026



A commissioner for taking Affidavits Virtually
Commissioned by Tiegan Kilbride
LSO#P17363, as per LSO corporate statement re COVID-19

INVOICE

MSI Spergel Inc.
200 Yorkland Blvd., Suite 1100
Toronto, Ontario M2J 5C1

Invoice Date: January 15, 2026
Invoice No.: 100194
Billing Through: January 8, 2026
Matter: 71585

Attention: Mukul Manchanda

RE: Cameron Partners Ltd.

Professional Fees

<u>Date</u>	<u>Description</u>	<u>Provider</u>	<u>Hours</u>
2025-12-22	review draft receiver's report	IJK	0.50
2025-12-28	email from P. Gennis	IJK	0.10
2025-12-30	email to P. Gennis; emails with P. Gennis; call with P. Gennis; email to C. Allen	IJK	0.30
2026-01-02	Review security documents;	JSQ	0.50
2026-01-05	Conduct corporate, PPSA and LRO searches and prepare security opinion;	JSQ	1.50
2026-01-05	Review, amend and comment on draft First Report and email Philip Gennis re same;	JSQ	1.00
2026-01-05	Receipt and review of guarantees and GSA from Melinda Vine via email; Revise draft security opinion and send to Philip Gennis for review and comment;	JSQ	0.80
2026-01-06	Receipt and review of missing BNS Assignment of Rents from Melinda Vine ;	JSQ	0.20
2026-01-07	review and comment on draft report and security opinion	IJK	0.40
Total			5.30
			\$3,180.00

Summary by Provider

IJK	Ian Klaiman	1.30	600.00	780.00
JSQ	James Quigley	4.00	600.00	2,400.00
		5.30		3,180.00

Total HST on Fees \$413.40

Disbursements Taxable

Corporate Profile Report	58.05
Bank Act Search	30.00
BC PPSA Search	58.05

PPSA Search	8.00
Execution Search and Copy of Registered Document	19.70
Total	\$173.80
Total HST on Disbursements	\$22.59

Total Fees and Disbursements	\$3,353.80
HST	\$435.99
Transferred from Trust	\$0.00
Total Fees, Disbursements & Taxes	\$3,789.79
Unpaid Balance as of Last Invoice	\$7,759.60

SPETTER ZEITZ KLAIMAN PC

Ian Klaiman

Payment of this account is due on receipt.	Total HST:	\$435.99
	HST No.:	720773514



NOTE: This account bears interest from one month after delivery in accordance with the rate prescribed by Section 128 of the Courts of Justice Act.

INVOICE

MSI Spergel Inc.
200 Yorkland Blvd., Suite 1100
Toronto, Ontario M2J 5C1

Invoice Date: January 31, 2026
Invoice No.: 100648
Billing Through: January 31, 2026
Matter: 71585

Attention: Mukul Manchanda

RE: Cameron Partners Ltd.

Professional Fees

<u>Date</u>	<u>Description</u>	<u>Provider</u>	<u>Hours</u>
2026-01-10	call from P. Gennis; email from P. Gennis; receipt and review edited draft report	IJK	0.40
2026-01-11	Review of amended Report from Philip Gennis ;	JSQ	0.50
2026-01-11	email from P. Gennis; receipt and review further edited draft report	IJK	0.30
2026-01-12	Order fresh tax certificate and PPSA search;	JSQ	0.20
2026-01-12	Review amended First Report;	JSQ	0.30
2026-01-12	Email purchaser 'chris@roslaw.ca' requesting title nominee information;	JSQ	0.20
2026-01-12	Receipt and review of fresh Tax Certificate;	JSQ	0.10
2026-01-12	Receipt and review of fresh PPSA search;	JSQ	0.10
2026-01-12	Finalize BNS security opinion;	JSQ	0.10
2026-01-12	Telephone call with Philip Gennis re approval motion and receipt of links to appendices;	JSQ	0.20
2026-01-13	email from P. Gennis	IJK	0.20
2026-01-14	Prepare Assignment and Assumption Agreement and send tom purchaser's lawyer Chris Martin and report to Receiver;	JSQ	0.50
2026-01-15	Email from Chris Martin re Assignment and Assumption Agreement is outside of what is contemplated by APS and report to Receiver;	JSQ	0.20
2026-01-15	Telephone call and email with Philip Gennis re Assignment and Assumption Agreement;	JSQ	0.30
2026-01-15	Email from lawyer Chris Martin that his client will sign the Assignment Agreement and report to Receiver;	JSQ	0.10
2026-01-15	Email exchange with Naumis, Peter re draft receivership order;	JSQ	0.10
2026-01-16	Receipt of signed Assignment and Assumption Agreement from Philip Gennis and finalized First Report and send to receiver for execution;	JSQ	0.70
2026-01-16	Receipt and review of signed Assignment and Assumption Agreement from Chris Martin and forward to Philip Gennis for execution by Receiver;	JSQ	0.10
2026-01-16	review draft receiver's report	IJK	0.40

2026-01-19	Receipt and review of signed First Report from Philip Gennis ;	JSQ	0.10
2026-01-19	Email Philip Gennis seeking missing appendices;	JSQ	0.10
2026-01-19	Receipt and review of missing Report appendix from Dharam Tiwana ;	JSQ	0.10
2026-01-21	Email exchange with purchaser lawyer Chris Martin re timeline;	JSQ	0.10
2026-01-25	Prepare draft vesting order;	JSQ	0.80
2026-01-26	Draft auxiliary order and send to Receiver and purchaser lawyer for review and comment;	JSQ	0.80
2026-01-26	Prepare Notice of Motion and circulate for review and comment;	JSQ	0.90
2026-01-26	review draft Notice of Motion and Approval and Vesting Order	IJK	0.50
2026-01-28	Email from purchaser lawyer Chris Martin with one comment re draft Vesting Order;	JSQ	0.10
2026-01-28	Correct draft Vesting Order;	JSQ	0.10
2026-01-29	Email from Philip Gennis approving motion material;	JSQ	0.10
2026-01-29	email from P. Gennis	IJK	0.10
2026-01-30	email from P. Gennis; review draft ancillary order; email to P. Gennis	IJK	0.40
2026-01-30	Receipt and review of proposed amendments to Auxiliary Order from Philip Gennis ;	JSQ	0.20
Total			9.40
			\$5,640.00

Summary by Provider

IJK	Ian Klaiman	2.30	600.00	1,380.00
JSQ	James Quigley	7.10	600.00	4,260.00
		9.40		5,640.00

Total HST on Fees \$733.20

Disbursements Taxable

The City of Windsor - Tax Certificate	146.90
PPSA Search	8.00
Total	\$154.90
Total HST on Disbursements	\$20.14

Total Fees and Disbursements	\$5,794.90
HST	\$753.34
Transferred from Trust	\$0.00
Total Fees, Disbursements & Taxes	\$6,548.24

Unpaid Balance as of Last Invoice	\$11,549.39
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SPETTER ZEITZ KLAIMAN PC

Ian Klaiman

Payment of this account is due on receipt.

Total HST:	\$753.34
HST No.:	720773514



NOTE: This account bears interest from one month after delivery in accordance with the rate prescribed by Section 128 of the Courts of Justice Act.

INVOICE

MSI Spergel Inc.
200 Yorkland Blvd., Suite 1100
Toronto, Ontario M2J 5C1

Invoice Date: February 28, 2026
Invoice No.: 101041
Billing Through: February 28, 2026
Matter: 71585

Attention: Mukul Manchanda

RE: Cameron Partners Ltd.

Professional Fees

<u>Date</u>	<u>Description</u>	<u>Provider</u>	<u>Hours</u>
2026-02-02	Review and approve service list;	JSQ	0.10
2026-02-03	Amend Auxillary Order in accordance with Philip G's advice and review and approve Approval and Vesting Motion Record;	JSQ	0.40
2026-02-03	Final review of Approval and Vesting Order Motion Record after amendment and instruct clerk to serve and file;	JSQ	0.10
2026-02-04	Email from Patrick Leung inquiring as to offer price;	JSQ	0.10
2026-02-04	Email from Strosberg, Sharon that Windsor takes no position on motion;	JSQ	0.10
2026-02-04	email from P. Leung; call from M. Vine	IJK	0.40
2026-02-05	email to P. Gennis; email from P. Gennis; review draft confidentiality undertaking	IJK	0.30
2026-02-17	Confirm sale order motion with court;	JSQ	0.20
2026-02-17	Prepare and file factum for sale motion;	JSQ	3.10
2026-02-18	Receipt and review of email from Philip Gennis attaching email from Philip Gennis	JSQ	0.20
2026-02-22	email from C. Allen; email to P. Gennis; email from P. Gennis	IJK	0.20
2026-02-23	Review Caselines for tomorrow's hearing and upload 2 orders;	JSQ	0.20
2026-02-23	Prepare for approval and vesting hearing;	JSQ	0.50
2026-02-24	Receipt and review of endorsement and orders re: AVO	IJK	0.20
2026-02-24	Prepare for approval and vesting hearing;	JSQ	1.00
2026-02-24	Attend Windsor court and obtain Approval and Vesting Hearing and report to Philip Gennis;	JSQ	1.00
2026-02-24	Receipt and review of signed and issued orders and send to Philip Gennis ;	JSQ	0.20
2026-02-24	Email to Philip Gennis reminding him about need for rent roll and info on last month's rent (if paid) for Statement of Adjustments;	JSQ	0.10
2026-02-25	Receipt and review of rent information from Philip Gennis;	JSQ	0.20
2026-02-25	Email to Patrick Leung requesting assistance and information on rentals;	JSQ	0.20

Total	8.80
	\$5,280.00

Summary by Provider

IJK	Ian Klaiman	1.10	600.00	660.00
JSQ	James Quigley	7.70	600.00	4,620.00
		8.80		5,280.00

Total HST on Fees	\$686.40
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Disbursements Taxable

Christina Hand - Postage	60.78
Total	\$60.78

Total HST on Disbursements	\$7.90
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Disbursements Non-Taxable

Minister of Finance - File Motion Record	339.00
Total	\$339.00

Total Fees and Disbursements	\$5,679.78
HST	\$694.30
Transferred from Trust	\$0.00
Total Fees, Disbursements & Taxes	\$6,374.08

Unpaid Balance as of Last Invoice	\$18,097.63
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SPETTER ZEITZ KLAIMAN PC

Ian Klaiman

Payment of this account is due on receipt.

Total HST:	\$694.30
HST No.:	720773514



NOTE: This account bears interest from one month after delivery in accordance with the rate prescribed by Section 128 of the Courts of Justice Act.

INVOICE

MSI Spergel Inc.
200 Yorkland Blvd., Suite 1100
Toronto, Ontario M2J 5C1

Invoice Date: April 8, 2026
Invoice No.: 101491
Billing Through: April 8, 2026
Matter: 71585

Attention: Mukul Manchanda

RE: Cameron Partners Ltd.

Professional Fees

<u>Date</u>	<u>Description</u>	<u>Provider</u>	<u>Hours</u>
2026-03-02	Second email to debtor's property manager re need for rent roll;	JSQ	0.10
2026-03-03	email from K. Avison	IJK	0.20
2026-03-03	Email from Philip Gennis stating Receiver will extend to March 19 for closing;	JSQ	0.10
2026-03-03	Receipt of email from Avison, Kelly (Avison Young - CA) requesting March 26 closing date and forward same to Philip Gennis for comment;	JSQ	0.20
2026-03-03	Email from Bryan Gelman to JJZ LAW setting out next steps in receivership leading to discharge;	JSQ	0.10
2026-03-03	Email purchaser lawyer Chris Martin with issued Vesting Order and set March 12 closing date;	JSQ	0.20
2026-03-03	Order Corporation Profile Report for 1212279 B. C. Ltd.;	JSQ	0.10
2026-03-03	Email exchange with Patrick Leung re rent roll and deposit information;	JSQ	0.10
2026-03-03	Telephone call with Philip Gennis re second mortgage lender, rent deposits and closing date for sale;	JSQ	0.30
2026-03-04	Email exchange with lawyer Chris Martin re extending closing to March 19;	JSQ	0.10
2026-03-09	Email to Chris Martin re Receiver willing to extend to March 19, 2026;	JSQ	0.10
2026-03-12	Email exchange with Patrick Leung re sale of property;	JSQ	0.20
2026-03-13	Send fully signed APS and signed consent re utilities to Purchaser law clerk;	JSQ	0.20
2026-03-13	Receipt of signed consent re utilities from Philip Gennis;	JSQ	0.10
2026-03-13	Correspond via email with Tori Kulchysky re sale details;	JSQ	0.10
2026-03-13	Email from Patrick Leung re send adjustments to his lawyer George;	JSQ	0.10
2026-03-16	Email exchange with Tori Kulchysky re closing details;	JSQ	0.20
2026-03-16	Email to Philip Gennis re rental info;	JSQ	0.10
2026-03-16	Telephone call with purchaser law clerk Tori to discuss manner of closing sale;	JSQ	0.30

2026-03-16	Receipt and review of rent roll; Compare with documentation provided by debtor's property manager; Prepare Statement of Adjustments with adjustments for deposit, tax, rents, rent deposits and key deposits; Email memorandum to Philip Gennis re review of Statement of Adjustments;	JSQ	2.30
2026-03-16	Email helpful precedent to Tori Kulchysky to assist in Vesting Order registration;	JSQ	0.20
2026-03-17	Receipt and review of amended rent roll from Dharam Tiwana ; Email exchanges with Dharam Tiwana to finalize Statement of Adjustments; Finalize Statement of Adjustments;	JSQ	1.50
2026-03-19	2 telephone calls with Philip Gennis; Receipt of signed documents from Receiver; Forward signed Assignment of Contracts to purchaser lawyer; Email from purchaser lawyer re further deposit being sent;	JSQ	0.30
2026-03-20	Email exchange with Tori Kulchysky confirming receipt of \$50k deposit;	JSQ	0.10
2026-03-20	Email from Philip Gennis inquiring whether \$50k received;	JSQ	0.10
2026-03-21	Receipt and review of Scotia payout letter from Philip Gennis;	JSQ	0.10
2026-03-21	Receipt and review of reporting email from Philip Gennis to Moliere, Jason ;	JSQ	0.10
2026-03-22	Prepare Amended Statement of Adjustments and forward to receiver and purchaser law firm for review;	JSQ	0.80
2026-03-22	Email from Moliere, Jason re acknowledge update;	JSQ	0.10
2026-03-23	review and discuss with J. Quigley the status of the pending sale	IJK	0.50
2026-03-23	All work to complete sale including corresponding with clerk Tori Kulchysky and lawyer Chris Martin and delivering Receiver's Certificate and drafting and providng Solicitor's Undertaking and ensuring funds were received and Vesting Order properly registered;	JSQ	2.80
2026-03-24	Requisition tax and water arrear payments;	JSQ	0.10
2026-03-24	Email from Jasmin Hay re delivery of keys;	JSQ	0.10
2026-03-24	Review and approve tax and water letters/amounts;	JSQ	0.10
2026-03-25	Email exchange with Patrick Leung re closing of property and Receiver working on distribution;	JSQ	0.20
2026-03-26	Email from Dharam Tiwana re request for trust ledger;	JSQ	0.10
2026-03-26	Email exchange with Patrick Leung and forward Statement of Adjustments;	JSQ	0.10
2026-03-26	Telephone call with Philip Gennis re subsequent encumbrancers;	JSQ	0.20
2026-03-31	Review trust ledger and SOA and confirm amounts to Receiver;	JSQ	0.20
Total			12.90
			\$7,740.00

Summary by Provider

IJK	Ian Klaiman	0.70	600.00	420.00
JSQ	James Quigley	12.20	600.00	7,320.00
		12.90		7,740.00

Total HST on Fees

\$1,006.20

Disbursements Taxable

Corporate Profile Report 1212279 B.C. Ltd.	59.55
TRANSACTION LEVY SURCHARGE	65.00
Total	\$124.55
Total HST on Disbursements	\$16.19

Total Fees and Disbursements	\$7,864.55
HST	\$1,022.39
Transferred from Trust	\$0.00
Total Fees, Disbursements & Taxes	\$8,886.94
Unpaid Balance as of Last Invoice	\$24,471.71

SPETTER ZEITZ KLAIMAN PC

Ian Klaiman

Payment of this account is due on receipt.	Total HST:	\$1,022.39
	HST No.:	720773514



NOTE: This account bears interest from one month after delivery in accordance with the rate prescribed by Section 128 of the Courts of Justice Act.

Trust Statement

Date	Description	Disbursements	Receipts
2026-03-19	Rose Law proceeds- wire		50,000.00
2026-03-23	Rose Law PC proceeds - wire		1,975,238.53
2026-03-25	The City of Windsor Payment of Tax Arrears for 040-220-13800-0000	120,217.12	
2026-03-25	Enwin Utilities Ltd. Payment of Water Account No. 00022575-03	1,375.21	
2026-03-25	msi Spergel Inc proceeds - wire	1,903,646.20	
	Total	\$2,025,238.53	\$2,025,238.53
	Trust Balance		\$0.00

INVOICE

MSI Spergel Inc.
200 Yorkland Blvd., Suite 1100
Toronto, Ontario M2J 5C1

Invoice Date: April 30, 2026
Invoice No.: 102151
Billing Through: April 30, 2026
Matter: 71585

Attention: Mukul Manchanda

RE: Cameron Partners Ltd.

Professional Fees

<u>Date</u>	<u>Description</u>	<u>Provider</u>	<u>Hours</u>
2026-04-08	Obtain copies of second mortgage and NOSI;	JSQ	0.30
2026-04-08	Email exchange with Philp Gennis re second mortgage and NOSI;	JSQ	0.20
2026-04-08	Email exchange with Indcom Support regarding payout of NOSI and have it amended to remove discharge fee and report to receiver;	JSQ	0.40
2026-04-09	Email from Patrick Leung confirming that Edwin Soon is the second mortgagee contact person;	JSQ	0.10
2026-04-09	Email exchanges with second mortgagee contact edwin soon ;	JSQ	0.20
2026-04-09	Telephone call with Philip Gennis re second mortgage issue;	JSQ	0.30
2026-04-09	Receipt and review of email from Philip Gennis re instructions for second mortgage issue;	JSQ	0.20
2026-04-13	Email to lawyer George Kyriazakos re second mortgage and report to receiver;	JSQ	0.20
2026-04-13	Prepared formal letter to go to second mortgagee in B.C. via registered mail asking for indebtedness and proof of advance;	JSQ	0.30
2026-04-13	Finalize formal letter to second mortgagee in B.C. and send by registered post and copy Philip Gennis;	JSQ	0.10
2026-04-14	Email exchange with Debtor lawyer George Kyriazakos re identity of contact person for second mortgagee and report to Receiver;	JSQ	0.20
2026-04-17	Email from Dharam Tiwana regarding purchaser has not assumed electric account;	JSQ	0.10
2026-04-17	Email to 'Tori Kulchysky' and Chris Martin asking them to have client assume electrical account;	JSQ	0.10
2026-04-18	email from P. Gennis	IJK	0.10
2026-04-20	email to P. Gennis; Teams meeting with P. Gennis and J. Quigley to discuss remaining estate administration, surplus sale proceeds, and final discharge and distribution motion	IJK	0.40
2026-04-20	MS Teams meeting with Philip Gennis and Ian Klaiman to discuss next steps re second mortgage;	JSQ	0.40

2026-04-20	Send letter to director of second mortgagee in B.C. via courier;	JSQ	0.10
2026-04-21	consider litigation strategy re: mortgage and excess funds; provide comments thereon	IJK	0.40
2026-04-21	Telephone call with Philip Gennis re strategy re second mortgage;	JSQ	0.30
2026-04-22	Email from purchaser law firm that purchaser has put hydro in its name;	JSQ	0.10
Total			4.50
			\$2,790.00

Summary by Provider

IJK	Ian Klaiman	0.90	600.00	540.00
JSQ	James Quigley	3.60	625.00	2,250.00
		4.50		2,790.00

Total HST on Fees \$362.70

Disbursements Taxable

Subsearch of Title	41.80
Total	\$41.80

Total HST on Disbursements \$5.43

Total Fees and Disbursements	\$2,831.80
HST	\$368.13
Transferred from Trust	\$0.00
Total Fees, Disbursements & Taxes	\$3,199.93

Unpaid Balance as of Last Invoice \$33,358.65

SPETTER ZEITZ KLAIMAN PC**Ian Klaiman**

Payment of this account is due on receipt.

Total HST: \$368.13
HST No.: 720773514



NOTE: This account bears interest from one month after delivery in accordance with the rate prescribed by Section 128 of the Courts of Justice Act.

INVOICE

MSI Spergel Inc.
200 Yorkland Blvd., Suite 1100
Toronto, Ontario M2J 5C1

Invoice Date: May 31, 2026
Invoice No.: 102828
Billing Through: May 31, 2026
Matter: 71585

Attention: Mukul Manchanda

RE: Cameron Partners Ltd.

Professional Fees

<u>Date</u>	<u>Description</u>	<u>Provider</u>	<u>Hours</u>
2026-05-05	Email from Patrick Leung re "promissory notes" and report to Philip Gennis;	JSQ	0.10
2026-05-05	email from P. Gennis	IJK	0.10
2026-05-06	email to P. Gennis	IJK	0.10
2026-05-06	Receipt and review of email from Ian Klaiman to Philip Gennis re need to disclose delay in seeking discharge and final distribution;	JSQ	0.10
2026-05-06	Email from Philip Gennis to Ian Klaiman requesting letter be sent to second mortgagee and Patrick Leung re delay;	JSQ	0.10
2026-05-22	Email from GK Law Firm Intern inquiring into delivery of surplus funds;	JSQ	0.10
2026-05-25	email from P. Gennis	IJK	0.10
2026-05-25	Draft letter to Edwin Soon and Patrick Leung and lawyers regarding no evidence of advances and need for judicial advice;	JSQ	0.50
2026-05-27	Email exchange with Philip Gennis and finalize letter to second mortgagee;	JSQ	0.20
2026-05-27	Finalize and send formal letter to second mortgagee rep Edwin Soon;	JSQ	0.10
2026-05-27	Telephone call from Philip Gennis re second mortgage issue;	JSQ	0.20
2026-05-27	Email to Edwin Soon that we need proof of advances asap before discharge hearing;	JSQ	0.20
Total			1.90
			\$1,180.00

Summary by Provider

IJK	Ian Klaiman	0.30	600.00	180.00
JSQ	James Quigley	1.60	625.00	1,000.00
		1.90		1,180.00

Total HST on Fees

\$153.40

Total Fees and Disbursements	\$1,180.00
HST	\$153.40
Transferred from Trust	\$0.00
Total Fees, Disbursements & Taxes	\$1,333.40

Unpaid Balance as of Last Invoice	\$0.00
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SPETTER ZEITZ KLAIMAN PC

Ian Klaiman

Payment of this account is due on receipt.

Total HST:	\$153.40
HST No.:	720773514



NOTE: This account bears interest from one month after delivery in accordance with the rate prescribed by Section 128 of the Courts of Justice Act.

INVOICE

MSI Spergel Inc.
200 Yorkland Blvd., Suite 1100
Toronto, Ontario M2J 5C1

Invoice Date: June 30, 2026
Invoice No.: 103197
Billing Through: June 30, 2026
Matter: 71585

Attention: Mukul Manchanda

RE: Cameron Partners Ltd.

Professional Fees

<u>Date</u>	<u>Description</u>	<u>Provider</u>	<u>Hours</u>
2026-05-27	review and edit draft response to mortgagee	IJK	0.20
2026-06-01	Receipt and review of email from edwin soon attaching proof of advance and forward to Philip Gennis;	JSQ	0.20
2026-06-01	Email from Philip Gennis re his position on second mortgage payout;	JSQ	0.10
2026-06-02	Correspond with Ian Klaiman re amount secured by second mortgage;	JSQ	0.10
2026-06-02	Discuss second mortgage issue with Ian Klaiman;	JSQ	0.30
2026-06-02	Receipt and review of memorandum of law from Ian Klaiman re can a mortgage secure additional advances;	JSQ	0.20
2026-06-02	Email correspondence with Patrick Leung re second mortgage debt;	JSQ	0.10
2026-06-02	Email correspondence with Edwin Soon re second mortgage debt;	JSQ	0.10
2026-06-02	consider payout request and supporting documentation for 1212279 B.C. Ltd. mortgage; review relevant mortgage and standard charge term documentation; review legal authorities on interpretation of standard charge terms and s. 17 of the Mortgages Act claims in the context of court appointed receivers; draft report and recommendation to P. Gennis on proposed distribution and proper payout charges	IJK	2.40
2026-06-03	email from P. Gennis	IJK	0.10
2026-06-03	Receipt and review of emails x2 from Edwin Soon re proof of second mortgage advance;	JSQ	0.20
2026-06-09	Email from Philip Gennis re letter should issue to second mortgagee explaining next steps;	JSQ	0.10
2026-06-10	Prepare letter to Edwin Soon, principal of the second mortgagee, regarding Receiver's position on second mortgage payout, and forward to Philip Gennis;	JSQ	0.30
2026-06-11	Email from Patrick Leung re wants to sign a direction to pay Edwin Soon;	JSQ	0.10
2026-06-11	Email from Edwin Soon re wants to be paid in full and forward to Receiver;	JSQ	0.10
2026-06-11	Telephone call from Philip Gennis to discuss final report and distribution hearing;	JSQ	0.20

2026-06-11	emails from E. Soon and P. Leung; email to P. Gennis; email from P. Gennis	IJK	0.10
2026-06-18	Receipt and review of further proof of advances from Edwin Soon and forward to Philip Gennis;	JSQ	0.20
2026-06-18	Receipt and review of "document file with 3 proofs of funding along with direction from borrower" from Edwin Soon and forward to Philp Gennis;	JSQ	0.20
Total			5.30
			\$3,242.50

Summary by Provider

IJK	Ian Klaiman	2.80	600.00	1,680.00
JSQ	James Quigley	2.50	625.00	1,562.50
		5.30		3,242.50

Total HST on Fees \$421.53

Total Fees and Disbursements	\$3,242.50
HST	\$421.53
Transferred from Trust	\$0.00
Total Fees, Disbursements & Taxes	\$3,664.03

Unpaid Balance as of Last Invoice \$1,333.40

SPETTER ZEITZ KLAIMAN PC**Ian Klaiman**

Payment of this account is due on receipt.

Total HST: \$421.53
HST No.: 720773514



NOTE: This account bears interest from one month after delivery in accordance with the rate prescribed by Section 128 of the Courts of Justice Act.

INVOICE

MSI Spergel Inc.
200 Yorkland Blvd., Suite 1100
Toronto, Ontario M2J 5C1

Invoice Date: July 31, 2026
Invoice No.: 103857
Billing Through: July 31, 2026
Matter: 71585

Attention: Mukul Manchanda

RE: Cameron Partners Ltd.

Professional Fees

<u>Date</u>	<u>Description</u>	<u>Provider</u>	<u>Hours</u>
2026-07-03	Email from Edwin Soon re status?	JSQ	0.10
2026-07-03	Email to Philip Gennis what does timeline look like for discharge hearing?	JSQ	0.10
2026-07-24	Prepare Notice of Motion for discharge hearing and consider issue of distribution and bankruptcy;	JSQ	2.40
2026-07-25	Email from Philip Gennis confirming tuition paid;	JSQ	0.10
2026-07-27	Telephone call with Philip Gennis re Second Report;	JSQ	0.20
2026-07-27	Telephone call from Philip Gennis re NOSI payout;	JSQ	0.10
2026-07-28	Forward NOSI payout to Philip Gennis;	JSQ	0.10
2026-07-29	Review and amend draft Second Report;	JSQ	0.80
2026-07-29	Collect all emails from second lender re proof of advances and send to Philip Gennis;	JSQ	0.60
2026-07-29	Telephone call with Philip Gennis re finalization Second Report;	JSQ	0.30
2026-07-30	Arrange second lender emails into package for report;	JSQ	0.60
2026-07-31	Edit First Report to add second mortgagee identity section and email to Philip Gennis;	JSQ	0.50
Total			5.90
			\$3,687.50

Summary by Provider

JSQ	James Quigley	5.90	625.00	3,687.50
		5.90		3,687.50

Total HST on Fees \$479.38

Total Fees and Disbursements	\$3,687.50
HST	\$479.38
Transferred from Trust	\$0.00
Total Fees, Disbursements & Taxes	\$4,166.88
Unpaid Balance as of Last Invoice	\$4,997.43

SPETTER ZEITZ KLAIMAN PC

Ian Klaiman

Payment of this account is due on receipt.

Total HST:	\$479.38
HST No.:	720773514



NOTE: This account bears interest from one month after delivery in accordance with the rate prescribed by Section 128 of the Courts of Justice Act.

INVOICE

MSI Spergel Inc.
200 Yorkland Blvd., Suite 1100
Toronto, Ontario M2J 5C1

Invoice Date: September 30, 2026
Invoice No.: 104633
Billing Through: September 30, 2026
Matter: 71585

Attention: Mukul Manchanda

RE: Cameron Partners Ltd.

Professional Fees

<u>Date</u>	<u>Description</u>	<u>Provider</u>	<u>Hours</u>
2026-08-04	Email from Patrick Leung asking about when motion will be served;	JSQ	0.10
2026-09-14	Review draft Second Report and telephone call to Philip Gennis re same - reprot can be finalized;	JSQ	0.30
2026-09-15	Receipt and review of Receiver's Second Report (executed) and revise Notice of Motion;	JSQ	0.20
2026-09-16	Review and approve compiled Second Report;	JSQ	0.20
2026-09-28	Preparation of factum for discharge hearing;	JSQ	1.60
2026-09-29	Complete factum for discharge hearing and arrange service.	JSQ	1.90
2026-09-29	Prepare and submit confirmation form;	JSQ	0.20
2026-09-29	Send formal letter to Shaun Laubman replying to request for information;	JSQ	0.10
2026-09-30	Email from Patrick Leung re he objects to fees;	JSQ	0.20
2026-09-30	Report via email to Philip Gennis re Leung objection;	JSQ	0.10
2026-09-30	Email to Edwin Soon re what he needs to do to prepare for hearing;	JSQ	0.20
2026-09-30	Telephone call with Philip Gennis to discuss Patrick Leung email and fee issue;	JSQ	0.30
Total			5.40
			\$3,375.00

Summary by Provider

JSQ	James Quigley	5.40	625.00	3,375.00
		5.40		3,375.00

Total HST on Fees \$438.75

Disbursements Taxable

FedEx - #877926933861 91.63

Total	\$91.63
Total HST on Disbursements	\$11.91

Disbursements Non-Taxable

Minister of Finance - File Motion Record	339.00
Total	\$339.00

Total Fees and Disbursements	\$3,805.63
HST	\$450.66
Transferred from Trust	\$0.00
Total Fees, Disbursements & Taxes	\$4,256.29
Unpaid Balance as of Last Invoice	\$4,166.88

SPETTER ZEITZ KLAIMAN PC

Ian Klaiman

Payment of this account is due on receipt.	Total HST:	\$450.66
	HST No.:	720773514



NOTE: This account bears interest from one month after delivery in accordance with the rate prescribed by Section 128 of the Courts of Justice Act.

THE BANK OF NOVA SCOTIA
Applicant

and

CAMERON PARTNERS LTD.
Respondent

Court File No. CV-25-00034491-0000

ONTARIO
SUPERIOR COURT OF JUSTICE

Proceeding commenced at
WINDSOR

AFFIDAVIT

SPETTER ZEITZ KLAIMAN PC
Barristers and Solicitors
100 Sheppard Avenue East, Suite 850
Toronto, Ontario M2N 6N5
Tel: (416) 789-0652

IAN KLAIMAN
LSO No. 58955G
Email: iklaiman@szklaw.ca

Lawyers for the Receiver, msi Spergel Inc.

THE BANK OF NOVA SCOTIA

Applicant

-and-

CAMERON PARTNERS LTD.

Respondent

Court File No.: CV-25-00034491-0000

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT
WINDSOR

**SUPPLEMENTARY
MOTION RECORD**

SPETTER ZEITZ KLAIMAN PC
Barristers & Solicitors
100 Sheppard Avenue East, Suite 850
Toronto, Ontario M2N 6N5

JAMES S. QUIGLEY
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Lawyers for the Receiver,
msi Spergel inc.