



**Supplement to the First Report of
KSV Restructuring Inc. as
Receiver of certain property of
30 Roe Investments Corp.**

July 15, 2022

Contents

Page

1.0	Introduction	1
1.1	Purposes of this Supplemental Report	1
1.2	Restrictions	1
2.0	Update on the Receivership Proceedings	2
2.1	Creditors	2
3.0	Listing Prices	2
4.0	Conclusion and Recommendation	3

Appendices

Appendix

Tab

Email dated July 13, 2022 from the Receiver's counsel to the Company	A
--	---



COURT FILE NO.: CV-22-00674810-00CL

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

B E T W E E N:

KINGSETT MORTGAGE CORPORATION

Applicant

- and -

30 ROE INVESTMENTS CORP.

Respondent

**APPLICATION UNDER SUBSECTION 243(1) OF THE BANKRUPTCY AND INSOLVENCY
ACT, R.S.C. 1985, c. B-3, AS AMENDED, AND SECTION 101 OF THE COURTS OF
JUSTICE ACT, R.S.O. 1990, c. C.43, AS AMENDED**

**SUPPLEMENT TO THE FIRST REPORT OF
KSV RESTRUCTURING INC.
AS RECEIVER**

July 15, 2022

1.0 Introduction

1. This report (“Supplemental Report”) supplements the Receiver’s First Report to Court dated July 7, 2022 (“First Report”).
2. Unless otherwise stated, capitalized terms used in this Supplemental Report have the meanings provided to them in the First Report.

1.1 Purposes of this Supplemental Report

1. The purposes of this Supplemental Report are to:
 - a) provide the Court with an update on the status of the receivership proceedings since the date of the First Report; and
 - b) provide the proposed listing prices of the Units as recommended by HomeLife.

1.2 Restrictions

1. This Supplemental Report is subject to the restrictions in the First Report.

2.0 Update on the Receivership Proceedings

1. On July 13, 2022, the Receiver's counsel sent an email to the Company (the "July 13th Email"), a copy of which is attached as Appendix "A"¹, which, among other things:
 - a) inquired as to whether the Company intends to oppose or otherwise respond to the Receiver's motion seeking, among other things, Court approval of the Sale Process, including whether the Company had engaged legal counsel;
 - b) followed up on the Receiver's prior requests/questions regarding the Company's proposed refinancing (including the requests described in Section 3.5 3. and 4. of the First Report and how the Company proposed to address the claims of CRA and RBC); and
 - c) reiterated the Receiver's prior demands for the delivery of the outstanding Records and Property, including the keys for the Units;
2. As of the writing of this Supplemental Report:
 - a) the Company has not responded to the July 13th E-mail (although it has indicated separately that the refinancing information requested by the Receiver will be provided on July 15); and
 - b) the Company has not provided any of the outstanding Records and Property described in Section 5 3. of the First Report.

2.1 Creditors

1. As of the writing of this Supplemental Report, the Receiver has still not received a list of creditors from the Company. Since the date of the First Report, the Receiver obtained property tax certificates for each of the Units, which reflect that as of July 12, 2022, the Company owes a total of \$18,027.96 (plus interest and fees) of property tax arrears. The Receiver understands that the substantial majority of these arrears relate to the period prior to the date of the Receivership Order.

3.0 Listing Prices

1. On July 13, 2022, a representative of the Receiver and two representatives of the HomeLife listing team were accompanied by Zar on a tour of seven (7) of the nine (9) Units. The Receiver and HomeLife were unable to view Unit PH06 due to the tenant advising the Company that they were feeling sick, and Unit PH01 as the Unit was padlocked from the inside. HomeLife assumed that the two Units it did not view were in similar condition to the seven Units it did view.

¹ The copy of the email attached as Appendix "A" excludes the numerous prior emails between counsel to the Receiver and the Company in the email chain.

- HomeLife recommends the following listing prices for the Units based on comparable sales in Minto 30 Roe, industry trends and the condition of the Units.

Unit Number	Listing Price ²
PH01	\$1,208,000
PH02	\$898,000
PH03	\$1,065,000
PH04	\$760,000
PH05	\$740,000
PH06	\$963,000
PH07	\$809,000
PH08	\$1,063,000
PH09	\$970,500

- The Receiver has requested that the Company provide a schedule detailing when each of the Units will be vacated, as it is the Receiver's preference to list Units for sale when they are vacant (although it reserves the right to list Units that are occupied). As of the writing of this Supplemental Report, the Receiver has not been provided with this information.

4.0 Conclusion and Recommendation

- Based on the foregoing, the Receiver respectfully recommends that this Honourable Court make orders granting the relief detailed in the First Report.

* * *

All of which is respectfully submitted,

KSV Restructuring Inc.

**KSV RESTRUCTURING INC.
SOLELY IN ITS CAPACITY AS COURT APPOINTED RECEIVER AND MANAGER OF
CERTAIN PROPERTY OF 30 ROE INVESTMENTS CORP.
AND NOT IN ITS PERSONAL OR CORPORATE CAPACITIES**

² The listing prices include one parking spot and one storage unit/ locker for each Unit.

Appendix “A”

From: Armstrong, Christopher
Sent: Wednesday, July 13, 2022 6:21 PM
To: Raymond Zar
Cc: Dunn, Mark
Subject: RE: Receivership of 30 Roe Investments Corp.

Dear Mr. Zar,

We are reaching out regarding the Receiver's motion returnable July 18 seeking, among other things, approval of a sale process. Can you please advise if you or 30 Roe intend to oppose or otherwise respond to the motion? Can you also please let us know if 30 Roe has engaged counsel in connection with the motion (and, if so, who, so we can coordinate with them).

We are also following up on the requests/questions to you in our emails of July 6 and July 8 (below) regarding 30 Roe's proposed refinancing. Please advise. We can confirm we have been advised by CIBC's counsel that if the arrears owing to CIBC are paid, the CIBC mortgages would be reinstated. Please advise of the arrears CIBC is owed.

Finally, we note that the Receiver's motion also seeks relief pertaining to the delivery of certain Property and Records of 30 Roe that have previously been requested/demanded by the Receiver on numerous occasions (see paragraph 3 of the draft order at Tab 4 of the Receiver's motion record for particulars of the Property and Records). Further to the Receiver's prior requests and demands in this regard, please treat this email as a demand for all such Records and Property to be delivered by 30 Roe and you immediately. In this regard, we note in particular that the Receiver has yet to receive the keys for the Units notwithstanding our numerous prior requests and your recent assurances they would be provided.

Chris Armstrong
Goodmans LLP

416.849.6013
carmstrong@goodmans.ca
goodmans.ca