

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
COMMERCIAL LIST**

THE HONOURABLE ) WEDNESDAY, THE 19<sup>TH</sup>  
 )  
MADAM JUSTICE STEELE ) DAY OF NOVEMBER, 2025  
 )

BETWEEN

**FIERA FP REAL ESTATE FINANCING FUND, L.P.**

Applicant

- and -

**CHANCERY (OSHAWA) THE BARTLETT LIMITED PARTNERSHIP and CHANCERY  
(OSHAWA) THE BARTLETT GP INC.**

Respondents

**IN THE MATTER OF AN 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**

**ORDER**

**THIS MOTION**, made by KSV Restructuring Inc. ("**KSV**"), in its capacity as court-appointed receiver and manager (in such capacity, the "**Receiver**"), without security, of the property, assets and undertaking (the "**Property**") of Chancery (Oshawa) The Bartlett Limited Partnership ("**Chancery LP**") and Chancery (Oshawa) The Bartlett GP Inc. ("**Chancery GP**" and with Chancery LP, the "**Partnership**"), for an order, *inter alia*: (i) approving the FPPA Resolution (as defined below); (ii) approving the Reports (as defined below), and the activities and conduct of the Receiver described therein; and (iii) approving the fees and disbursements of the Receiver and its counsel, Cassels Brock & Blackwell LLP ("**Cassels**"), was heard this day by judicial videoconference via Zoom in Toronto, Ontario.

**ON READING** the Motion Record of the Receiver dated November 12, 2025, including the Third Report of the Receiver dated November 12, 2025 (including the appendices thereto) (the "**Third Report**"), and on hearing the submissions of counsel for the Receiver and such other

counsel as were present, no one else appearing although duly served as appears from the Affidavit of Service of Eva Hyderman dated November 12, 2025.

### **SERVICE AND DEFINITIONS**

1. **THIS COURT ORDERS** that the time for service and filing of the Notice of Motion and the Motion Record is hereby abridged and validated so that this Motion is properly returnable today and hereby dispenses with further service thereof.

2. **THIS COURT ORDERS** that capitalized terms used in this Order and not otherwise defined herein shall have the meanings ascribed to them in the Third Report.

### **APPROVAL OF FPPA RESOLUTION**

3. **THIS COURT ORDERS** that the Receiver be and is hereby authorized and directed to enter a guilty plea for and on behalf of Chancery GP (and not in the Receiver's personal or corporate capacity) in connection with the FPPA Prosecution (as defined in the Third Report) and pay the fine equal to \$5,000.00 plus the applicable victim fine surcharge and costs agreed to in connection therewith (the "**FPPA Resolution**").

4. **THIS COURT ORDERS** that the Receiver is hereby authorized to act on behalf of Chancery GP in fulfilling Chancery GP's obligations under the FPPA Resolution and any ancillary documents and agreements related thereto, including paying the fine, victim fine surcharge and costs contemplated by the FPPA Resolution, and to take such additional steps and execute such additional documents as may be necessary or desirable to give effect to the FPPA Resolution.

### **APPROVAL OF RECEIVER'S REPORTS AND ACTIVITIES**

5. **THIS COURT ORDERS** that the Pre-Filing Report of the Proposed Receiver dated July 13, 2023, the First Report of the Receiver dated November 9, 2023, the Second Report of the Receiver dated March 25, 2025 and the Third Report (collectively, the "**Reports**"), and the actions, conduct and activities of the Receiver described 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.

**APPROVAL OF FEES AND DISBURSEMENTS OF THE RECEIVER AND ITS COUNSEL**

6. **THIS COURT ORDERS** that the fees and disbursements of the Receiver and Cassels, as described in the Third Report and supported by the affidavits appended thereto, be and are hereby approved.

**GENERAL**

7. **THIS COURT HEREBY REQUESTS** the aid and recognition of any court, tribunal and regulatory or administrative bodies, having jurisdiction in Canada or in any other foreign jurisdiction, to give effect to this Order and to assist the Receiver and its agents in carrying out the terms of this Order. All courts, tribunals and regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Receiver, as an officer of this Court, as may be necessary or desirable to give effect to this Order or to assist the Receiver and its agents in carrying out the terms of this Order.

8. **THIS COURT ORDERS** that this Order and all of its provisions are effective as of 12:01 a.m. (Eastern Time) on the date of this Order without the need for entry or filing.

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**IN THE MATTER OF THE RECEIVERSHIP OF CHANCERY (OSHAWA) THE BARTLETT LIMITED PARTNERSHIP AND CHANCERY (OSHAWA)  
THE BARTLETT GP INC.**

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
COMMERCIAL LIST**

PROCEEDING COMMENCED AT TORONTO

**ORDER**

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