

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

B E T W E E N:

**LONDON VALLEY IV INC.,
by its Court-Appointed Receiver and Manager, KSV RESTRUCTURING INC.**

Plaintiff

and -

**BEHZAD PILEHVER also known as BEN PILEHVER also known as BEHZAD
PILEHVAR also known as BEN PILEHVAR also known as BEN PILEVHR, MAHTAB
NALI also known as MAHTAB NALI PILEHVAR also known as MAHTAB PILEHVAR
and 2621598 ONTARIO INC. doing business as NALI AND ASSOCIATES**

Defendants

**AIDE-MÉMOIRE OF THE PLAINTIFF
(Default Judgment Motion returnable on November 17, 2025 at 11:00 a.m.)**

1. This aide-mémoire is filed in connection with the Plaintiff's motion for default judgment as against the Defendants, to provide the Court with a status update:

- i. on service of the motion materials and the lack of response thereto;
- ii. concerning the Compendium for Oral Argument ([A2783](#)) filed by the Plaintiff; and
- iii. that Blaney McMurtry LLP has been advised of the relief contained in paragraph 8 of the draft Judgment ([A2682](#)) sought and does not oppose such relief.

Service of Default Judgment Motion Materials on the Defendants

2. Each of the Defendants was served with the Plaintiff's Default Judgment Motion Record ([A2287](#)) and Factum ([A2743](#)) (the "**Motion Materials**"), as follows and as outlined in the Affidavit of Service uploaded to Case Center ([A2774](#)):

- (a) On November 5, 2025, the Motion Materials were emailed to the Defendant, Mr. Pilehver ([A2777](#));
- (b) On November 5, 2025, the Motion Materials were sent via same-day courier to Mr. Pilehver at his last two known addresses ([A2779](#)); and
- (c) On November 5, 2025, the Motion Materials were sent via same-day courier to Ms. Nali and Nali and Associates at their last two known addresses ([A2781](#)).

No Response Received from Defendants

3. As stated above, and notwithstanding the foregoing service of the Motion Materials on each of the Defendants, no response has been received from the Defendants whatsoever.

Compendium for Oral Argument of the Plaintiff

4. The Receiver has uploaded to Case Center its Compendium for Oral Argument dated November 13, 2025 ([A2783](#)). The Compendium contains extracts from the Motion Record and Factum authorities cited, to demonstrate that the deemed admissions of fact and evidence filed by the Receiver entitle the Plaintiff, as a matter of law, to the draft Judgment ([A2680](#)) sought at Tab 4 of the Motion Record.

5. The Compendium is structured, with headings, to address each paragraph of the draft Judgment ([A2680](#)) sought at Tab 4 of the Motion Record.

Requested Order Regarding LV IV Funds Held by Blaney McMurtry LLP

6. Paragraph 8 of the draft Judgment ([A2682](#)) would require Blaney McMurtry LLP (“**Blaney**”) to transfer approximately \$34,000 to the Receiver in partial satisfaction of the Judgment.

7. On November 14, 2025, the Receiver’s counsel exchanged emails with Tim Dunn, a partner at Blaney. Mr. Dunn was made aware that the aforementioned Order is being sought at this Default Judgment Motion. Mr. Dunn thanked the Receiver’s counsel for letting him know and did not oppose the Order sought.

All of which is respectfully submitted this 14th day of November, 2025.

Per: _____



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**LONDON VALLEY IV INC.,
by its Court-Appointed Receiver and Manager,
KSV RESTRUCTURING INC.**
Plaintiff

- and -

BEHZAD PILEHVER, et al.

Defendants

Court File No. CV-25-00748799-00CL

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SUPERIOR COURT OF JUSTICE
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Proceedings commenced at Toronto

AIDE-MÉMOIRE OF THE PLAINTIFF
(Default Judgment Motion returnable November 17, 2025)

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