

**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 DEFENDANT BEN PILEHVAR  
(Case Conference returnable on September 9, 2025 at 2:00 p.m.)**

**A. OVERVIEW**

1. This aide memoire is filed by the defendant, Ben Pilehvar (“Mr. Pilehvar”), further to the Endorsement of the Honourable Justice Osborne dated August 26, 2025 in advance of the September 9, 2025 case conference.

**Recent Retainer and Status of Proceeding**

2. Following the August 26, 2025 case conference, Peter Henein from Henein Hutchison Robitaille LLP has now been retained by Mr. Pilehvar.
3. Plaintiffs served Mr. Pilehvar with a Notice of Action and a Statement of Claim on September 3, 2025. Mr. Pilehvar is currently preparing his defence.
4. Mr. Pilehvar is in the process of preparing his sworn statement of his respective assets and aims to provide it to the parties by September 9, 2025.

5. The August 7 Mareva Order by Justice J. Dietrich requires a sworn statement describing the nature, value, and location of the defendants' assets ("August 7 Order"):

**"Disclosure of Information**

5. **THIS COURT ORDERS** that the Defendants each prepare and provide to the Plaintiff within seven (7) days of the date of service of this Order, with a sworn statement describing the nature, value, and location of the Defendants' respective assets worldwide, whether in the Defendants' own names or not and whether solely or jointly owned."<sup>1</sup>

6. On August 15, 2025, Justice J. Dietrich extended the August 7 Order pending the determination of any motion brought by the defendants to discharge or vary the August 7 Orders ("August 15 Order").<sup>2</sup>
7. Mr. Pilehvar was served with the August 15 Order on September 2, 2025, and in accordance with Paragraph 5 of the August 7 Order, has until September 9, 2025 to provide his sworn statement.<sup>3</sup>

**Timetable for a Discharge Motion**

8. As discussed at the August 26, 2025 case conference, Mr. Pilehvar remains willing to engage in discussions with a view to resolving all outstanding matters on consent, thereby avoiding the need for a further contested hearing.
9. In the event a resolution cannot be reached, counsel will provide a proposed timetable for proceeding with a motion to discharge or vary the August 7 Order.

All of which is respectfully submitted this 5<sup>th</sup> day of September, 2025.

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<sup>1</sup> The August 7 *Mareva* Order, Case Centre, p. [B-1-10](#)

<sup>2</sup> The August 15 *Mareva* Order, Case Centre, p. [B-1-5](#)

<sup>3</sup> Service of Endorsement dated August 26, 2025, Case Centre, p. [B-1-1](#)

Per: *Sarina Nezhadian*

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Lawyers for the Defendant, Ben Pilehvar.