

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

B E T W E E N:

MIZUE FUKIAGE, AKIKO KOBAYASHI, YOSHIKI FUKIAGE, KOBAYASHI KYOHODO CO., LTD., TORU FUKIAGE, and KWANG-CHENG (TONY) WEI, IN HIS PERSONAL CAPACITY AS A TAIWANESE INVESTOR AND IN HIS CAPACITY AS AGENT FOR THE OTHER TAIWANESE INVESTORS

Applicants

- and -

CLEARVIEW GARDEN ESTATES INC., TALBOT CROSSING INC., NIAGARA ESTATES OF CHIPPAWA II INC., LONDON VALLEY INC., LONDON VALLEY II INC., LONDON VALLEY III INC., LONDON VALLEY IV INC., LONDON VALLEY V INC., FORT ERIE HILLS INC., 2533430 ONTARIO INC., CGE CAPITAL MANAGEMENT INC., TGP-TALBOT CROSSING INC., NEC II CAPITAL MANAGEMENT INC., LV CAPITAL MANAGEMENT INC., LV II CAPITAL MANAGEMENT INC., LV III CAPITAL MANAGEMENT INC., LV IV CAPITAL MANAGEMENT INC., LV V CAPITAL MANAGEMENT INC., FORT ERIE HILLS CAPITAL MANAGEMENT INC., HALTON PARK INC., NIAGARA FALLS PARK INC., TSI-HP INTERNATIONAL CANADA INC., and TSI INTERNATIONAL- GRANDTAG A2A NIAGARA IV INC.

Respondents

IN THE MATTER OF AN APPLICATION UNDER SECTION 101 OF THE *COURTS OF JUSTICE ACT*, R.S.O. 1990, c. C.43, AS AMENDED AND RULES 14.05(2) AND (3) OF THE *RULES OF CIVIL PROCEDURE*, R.R.O. 1990, REG. 194, AS AMENDED

**AIDE-MÉMOIRE OF THE RECEIVER
(Motion returnable on June 16, 2026 at 10:00 a.m.)**

June 12, 2026

AIRD & BERLIS LLP
Barristers and Solicitors
181 Bay Street, Suite 1800
Toronto, ON M5J 2T9

Mark van Zandvoort (LSO No. 59120U)
Email: mvanzandvoort@airdberlis.com

Kyle Plunkett (LSO No. 61044N)
Email: kplunkett@airdberlis.com

Roula Khairalla (LSO No. 90775A)
Email: rkhairalla@airdberlis.com

Calvin Horsten (LSO No. 90418I)
Email: chorsten@airdberlis.com

Lawyers for the Receiver

PURPOSE OF AIDE-MÉMOIRE

1. This aide-mémoire is submitted by AlixPartners Restructuring, Inc. (“**AlixPartners**”), formerly, KSV Restructuring Inc. (“**KSV**”)¹ (the “**Receiver**”), as the Receiver of Halton Park, to update the Court:

- (a) that the motion returnable on June 16, 2026 is anticipated to proceed on an unopposed basis; and
- (b) as to the service effected on First Global following the case conference held before the Honourable Justice Myers on May 11, 2026² at which this motion was scheduled (the “**May 11 Case Conference**”).

2. Capitalised terms not defined herein have the meaning ascribed to them in the Receiver’s Factum dated June 5, 2026.³

SERVICE ON FIRST GLOBAL

3. Elena Salvatore is the sole director and officer of First Global.⁴ Vincent Salvatore is Ms. Salvatore’s spouse, and has been alleged by others to be the operating mind of First Global.⁵

4. Pursuant to the endorsement of the Honourable Justice Myers issued at the May 11 Case Conference (the “**Myers J. Endorsement**”), His Honour endorsed and directed that:

- (a) The Receiver has served Ms. Salvatore at an email address that was provided to counsel for the Receiver by former counsel for First Global. There has been no response received from Ms. Salvatore at that email address;⁶
- (b) It would be prudent to send a courtesy copy of the motion material to Angela Assuras, a lawyer who acts for Vincent Salvatore in other matters;⁷

¹ Effective June 1, 2026, KSV’s parent company was acquired by an affiliate of AlixPartners, following which KSV changed its name to AlixPartners and KSV was substituted for AlixPartners in all of its ongoing Court appointments pursuant to a Court Order dated June 3, 2026. The professionals involved in this mandate from the outset remain unchanged.

² Endorsement of the Honourable Justice Myers issued May 11, 2026 (“**Myers J. Endorsement**”), Appendix “5” to the Supplement to the Fifth Report of KSV Restructuring Inc. dated May 26, 2026 (“**Supplement to Fifth Report**”), Case Center [E6117](#).

³ Factum of the Receiver/Moving Party dated June 5, 2026, Case Center [E7673](#).

⁴ Profile Report for First Global, Appendix “16” to the Fifth Report, Case Center [E6635](#).

⁵ Fifth Report at para 34, Case Center [E6187](#).

⁶ Myers J. Endorsement at para. 4, Appendix “5” to the Supplement to Fifth Report, Case Center [E6118](#).

⁷ Myers J. Endorsement at para. 7, Appendix “5” to the Supplement to Fifth Report, Case Center [E6118](#).

- (c) If First Global wishes to participate in this proceeding, it is required to be represented by a licensed lawyer;⁸
 - (d) First Global will have until May 20, 2026 to deliver a Notice of Appearance by a lawyer;⁹ and
 - (e) If no lawyer goes on record formally for First Global, the hearing of this motion is scheduled for June 16, 2026 for one hour by Zoom.¹⁰
5. Following the May 11 Case Conference:¹¹
- (a) Ms. Salvatore was personally served on May 12, 2026 with: (i) the Receiver's Motion Record dated May 6, 2026 (the "**Motion Record**"); (ii) the Myers J. Endorsement; and (iii) a cover letter from counsel to the Receiver providing clear direction that First Global was required to deliver a Notice of Appearance by May 20, 2026;¹² and
 - (b) A courtesy copy of the Motion Record and the Myers J. Endorsement was sent by email to Ms. Assuras on May 11, 2026.¹³

FIRST GLOBAL HAS NOT RESPONDED TO THIS MOTION

6. Despite the foregoing service, no response was received from First Global or Ms. Assuras by the May 20, 2026 deadline by which a Notice of Appearance was required to be served.¹⁴

7. On June 3, 2026, the Receiver's counsel received a telephone call from Mr. Salvatore, who indicated that he could be reached at his email address as contained on the Service List. Before communicating with him further, the Receiver's counsel sent an email to Ms. Assuras on June 3, 2026 to confirm that the Receiver's counsel could communicate with Mr. Salvatore directly. Ms. Assuras responded on June 4, 2026 indicating that she is not retained and that the Receiver's counsel was permitted to contact Mr. Salvatore directly.¹⁵

⁸ Myers J. Endorsement at para. 8, Appendix "5" to the Supplement to Fifth Report, Case Center [E6118](#).

⁹ Myers J. Endorsement at para. 9, Appendix "5" to the Supplement to Fifth Report, Case Center [E6118](#).

¹⁰ Myers J. Endorsement at para. 11, Appendix "5" to the Supplement to Fifth Report, Case Center [E6119](#).

¹¹ Supplement to Fifth Report at paras. 7-8, Case Center [E6042-E6043](#).

¹² May 12, 2026 Cover Letter to First Global and Affidavit of Service of the Process Server, Man Ho Herman Tsui sworn May 13, 2026, Appendix "7" to the Supplement to Fifth Report, Case Center [E6138-E6140](#).

¹³ Supplement to Fifth Report at para. 13, Case Center [E6043](#) and May 11, 2026 email to Ms. Assuras at Appendix "9" to the Supplement to Fifth Report, Case Center [E6146](#).

¹⁴ Supplement to Fifth Report at paras. 9 and 13, Case Center [E6043](#).

¹⁵ Emails exchanged by Aird & Berlis LLP and Ms. Assuras on June 3 and 4, 2026 at Appendix "A" to Aide-Mémoire of the Receiver dated June 12, 2026 ("**Aide-Mémoire of the Receiver**").

8. On June 4, 2026, the Receiver's counsel sent an email to Mr. Salvatore requesting that he advise of the nature of his inquiry.¹⁶ Mr. Salvatore did not respond.

9. Subsequently, Mr. Salvatore appears to have attempted to contact the Receiver's counsel by telephone on June 4, but did not leave a message. Ms. Salvatore appears to have attempted to contact the Receiver's counsel by telephone on June 5 and 9, 2026, but did not leave a message.

10. Accordingly, the Receiver's counsel sent a follow-up email to both Mr. and Mrs. Salvatore on June 9, 2026 to: (i) ask that they advise of the nature of their inquiry; and (ii) indicate that the Receiver and its counsel are not willing to have without prejudice communications at this time.¹⁷

11. No email or telephone calls have been received by the Receiver or its counsel from Mr. or Mrs. Salvatore subsequent to the email sent to them on June 9, 2026.

ANTICIPATED ATTENDEES AT JUNE 16, 2026 MOTION

12. Aside from First Global who has not responded to this motion, all interested parties have confirmed that they do not oppose the release of the VTB Proceeds to the Receiver and claim no entitlement to the VTB Proceeds.¹⁸

13. The Receiver anticipates that the sole attendees at the June 16, 2026 motion will be the Receiver and its counsel, and Mr. Hoffner appearing on a self-represented basis to observe the motion.¹⁹

¹⁶ June 4 and 9, 2026 emails sent by Aird & Berlis LLP to Mr. Salvatore and to Mr. and Mrs. Salvatore, respectively, at Appendix "B" to Aide-Mémoire of the Receiver.

¹⁷ June 4 and 9, 2026 emails sent by Aird & Berlis LLP to Mr. Salvatore and to Mr. and Mrs. Salvatore, respectively, at Appendix "B" to Aide-Mémoire of the Receiver.

¹⁸ Fifth Report at paras. 72 to 76, Case Center pp. [E6195-E6196](#).

¹⁹ Email from Mr. Hoffner dated May 26, 2026 at Appendix "C" to Aide-Mémoire of the Receiver.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 12th day of June, 2026.

Per:



AIRD & BERLIS LLP

Mark van Zandvoort (LSO No. 59120U)

Email: mvanzandvoort@airdberlis.com

Kyle Plunkett (LSO No. 61044N)

Email: kplunkett@airdberlis.com

Roula Khairalla (LSO No. 90775A)

Email: rkhairalla@airdberlis.com

Calvin Horsten (LSO No. 90418I)

Email: chorsten@airdberlis.com

Lawyers for the Receiver

APPENDIX A

From: angela@assuras-lawoffice.ca
Sent: June 4, 2026 2:11 PM
To: Mark van Zandvoort
Cc: Kyle Plunkett; Roula Khairalla; Calvin Horsten
Subject: RE: FUKIAGE et al v. CLEARVIEW GARDEN ESTATES INC. et al (CV-25-00736577-00CL)

Mark:

I am not retained. You can speak to Vincent Salvatore directly.

Angela Assuras

On Wed, 3 Jun 2026 20:12:20 +0000, Mark van Zandvoort <mvanzandvoort@airdberlis.com> wrote:

Good afternoon Angela,

Our office received a call this afternoon from Vincent Salvatore. Before we respond to him directly, we would like to first ensure that you still do not represent him in this matter, such that we are permitted to contact him directly.

Kindly confirm.

Best,

Mark

Mark van Zandvoort
Partner | Lawyer

T 416.865.4742
E mvanzandvoort@airdberlis.com

Aird & Berlis LLP
Toronto | Vancouver

Aird & Berlis LLP operates as a multi-disciplinary practice.

This email is intended only for the individual or entity named in the message. Please let us know if you have received this email in error. If you did receive this email in error, the information in this email may be confidential and must not be disclosed to anyone.

From: Roula Khairalla <rkhairalla@airdberlis.com>

Sent: May 11, 2026 5:18 PM

To: angela@assuras-lawoffice.ca

Cc: Mark van Zandvoort <mvanzandvoort@airdberlis.com>; Kyle Plunkett <kplunkett@airdberlis.com>; Calvin Horsten <chorsten@airdberlis.com>

Subject: FUKIAGE et al v. CLEARVIEW GARDEN ESTATES INC. et al (CV-25-00736577-00CL)

Good afternoon Ms. Assuras,

Further to Mr. van Zandvoort's email below, as you know, we are the lawyers for the Receiver in the above noted matter. While we appreciate you are not retained by Vincent Salvatore in this matter, as a courtesy, we are providing you with a copy of the Receiver's Motion Record in connection with a motion being brought by the Receiver returnable on June 16, 2026 (the motion record is contained in the following ShareFile link: <https://airdberlis.sharefile.com/public/share/web-sc1c0e71d3e7e49d18eccd0108fda4c0a>).

We are also attaching as a courtesy the endorsement of the Honourable Justice Myers from today's case conference, which provides that if First Global Financial Corp. wishes to participate in this proceeding, it is required to be represented by a licensed lawyer, and has until May 20, 2026 to deliver a Notice of Appearance by a lawyer. If no lawyer goes on record formally for First Global Financial Corp., or if the parties' lawyers agree on a schedule to accommodate it, the hearing of the motion is scheduled for June 16, 2026 for one hour by Zoom.

Regards,

Roula Khairalla

Associate | Lawyer

T 416.865.7759

E rkhairalla@airdberlis.com

Aird & Berlis LLP

Toronto | Vancouver

Aird & Berlis LLP operates as a multi-disciplinary practice.

This email is intended only for the individual or entity named in the message. Please let us know if you have received this email in error. If you did receive this email in error, the information in this email may be confidential and must not be disclosed to anyone.

From: Mark van Zandvoort <mvanzandvoort@airdberlis.com>

Sent: April 7, 2026 5:09 PM

To: angela@assuras-lawoffice.ca

Cc: Kyle Plunkett <kplunkett@airdberlis.com>; Calvin Horsten <chorsten@airdberlis.com>; Roula Khairalla <rkhairalla@airdberlis.com>

Subject: RE: Receiver

Good afternoon Angela,

The Receiver's Case Website is available here: [Clearview Garden Estates](#).

Should you be retained by Mr. Vincent Salvatore and wish to be added to the [Service List](#), please let us know.

Best,

Mark

Mark van Zandvoort
Partner | Lawyer

T 416.865.4742

F 416.863.1515
E mvanzandvoort@airdberlis.com

Aird & Berlis LLP
Toronto | Vancouver

Brookfield Place, 181 Bay Street, Suite 1800
Toronto, ON M5J 2T9 | airdberlis.com



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If you did receive this email in error, the information in this email may be confidential and must not be disclosed to anyone.

From: angela@assuras-lawoffice.ca <angela@assuras-lawoffice.ca>
Sent: April 7, 2026 4:49 PM
To: Mark van Zandvoort <mvanzandvoort@airdberlis.com>
Subject: Receiver

Mark:

Further to our telephone conference this afternoon, kindly send me the link to the receiver's website. I could not see the matter on the receiver's website when I checked on the weekend.

I attach a copy of the Order that I obtained from a title search on one of the properties that was blanketed with the \$110 million mortgage.

Angela Assuras

ANGELA ASSURAS PROFESSIONAL CORPORATION

Barrister & Solicitor

7 St. Thomas Street

Suite 310

Toronto, Ontario

M5S 2B7

Phone: 416-601-0131

Fax: 416-601-1462

Email: angela@assuras-lawoffice.ca

APPENDIX B

From: Mark van Zandvoort
Sent: June 9, 2026 11:46 AM
To: vincentsalvatore@hotmail.com; elenasalv2000@yahoo.ca
Cc: Kyle Plunkett; Roula Khairalla; Calvin Horsten
Subject: RE: RE: FUKIAGE et al v. CLEARVIEW GARDEN ESTATES INC. et al (CV-25-00736577-00CL)

Mr. and Mrs. Salvatore,

Our office has missed calls from each of you separately, but no voicemail were left. Further to my June 4, 2026 email to Mr. Salvatore below, please advise of the nature of your inquiry.

The Receiver and its counsel are not willing to have without prejudice discussions or communications at this time.

We look forward to receiving your response, if any, by email.

Regards,

Mark

Mark van Zandvoort
Partner | Lawyer

T 416.865.4742
E mvanzandvoort@airdberlis.com

Aird & Berlis LLP
Toronto | Vancouver

Aird & Berlis LLP operates as a multi-disciplinary practice.

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If you did receive this email in error, the information in this email may be confidential and must not be disclosed to anyone.

From: Mark van Zandvoort
Sent: June 4, 2026 2:50 PM
To: 'vincentsalvatore@hotmail.com' <vincentsalvatore@hotmail.com>
Cc: Kyle Plunkett <kplunkett@airdberlis.com>; Roula Khairalla <rkhairalla@airdberlis.com>; Calvin Horsten <chorsten@airdberlis.com>
Subject: RE: FUKIAGE et al v. CLEARVIEW GARDEN ESTATES INC. et al (CV-25-00736577-00CL)

Mr. Salvatore,

As you know, we are the lawyers for the court-appointed Receiver in the above noted receivership proceeding.

I understand from my colleague, Roula Khairalla, that you called her yesterday, but that Ms. Khairalla was away from the office.

Please advise of the nature of your inquiry.

Regards,

Mark

Mark van Zandvoort

Partner | Lawyer

T 416.865.4742

F 416.863.1515

E mvanzandvoort@airdberlis.com

Aird & Berlis LLP

Toronto | Vancouver

Brookfield Place, 181 Bay Street, Suite 1800

Toronto, ON M5J 2T9 | airdberlis.com



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APPENDIX C

From: randy hoffner <randyhoffner66@gmail.com>
Sent: May 26, 2026 5:50 PM
To: Aleksandra Cupic
Subject: Re: Mizue Fukiage et al. v. Clearview Garden Estates Inc. et al. / Court File No. CV-25-00736577-00CL
Attachments: Supplementary Motion Record - Receiver - KSV Restructuring Inc. - 26-MAY-2026.pdf

I will be on zoom call , I have been trying to to fully cooperate, I am not techy and don't have access to the information as it was given to first global and paybank.

Randy

On May 26, 2026, at 2:53 PM, Aleksandra Cupic <acupic@airdberlis.com> wrote:

TO THE SERVICE LIST:

Further to the below, please find attached the Receiver's Supplementary Motion Record dated May 26, 2026, served in connection with the Receiver's motion taking place via Zoom on June 16, 2026 at 10 a.m.

If any parties plan to attend, please advise by responding to this email.

The Zoom details for the June 16, 2026 motion are below.

Link:

<https://ca01web.zoom.us/j/66335927377?pwd=WPn2uJEFhD0iiWrITpXnMgEbwShPKY.1#success>

Meeting ID: 663 3592 7377

Passcode: 659359

Regards,

Aleksandra Cupic

Assistant to Codie Mitchell, Roula Khairalla, Anisha Bhardwaj & Trevor Alcove

T 416.863.1500 x2437
E acupic@airdberlis.com

Aird & Berlis LLP

Toronto | Vancouver

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This email is intended only for the individual or entity named in the message. Please let us know if you have received this email in error. If you did receive this email in error, the information in this email may be confidential and must not be disclosed to anyone.

From: Roula Khairalla

Sent: May 11, 2026 5:15 PM

To: mclachlana@bennettjones.com; shakram@bennettjones.com; fosterj@bennettjones.com;

ngoldstein@ksvadvisory.com; dsieradzki@ksvadvisory.com; jwong@ksvadvisory.com;
ttrifunovic@ksvadvisory.com; georgel@SimpsonWigle.com; mitchellk@SimpsonWigle.com;
adobrogeanu@rossmcbride.com; robf@forbeslaw.ca; jeff.larry@paliareroland.com;
ryan.shah@paliareroland.com; greg.roberts@roblaw.ca; dbadham@btrlaw.ca;
brennan@brartamber.com; elenasalv2000@yahoo.ca; vincentsalvatore@hotmail.com;
awygodny@wagnersidlofsky.com; ben@sandgecko.ca; randyhoffner66@gmail.com;
randyhoffner@adval.ca; mclachlana@bennettjones.com; fosterj@bennettjones.com;
clifton.prophet@gowlingwlg.com; asim.iqbal@gowlingwlg.com; patryk.sawicki@gowlingwlg.com;
carol.liu@gowlingwlg.com; helen@hg-law.org; william.fawcett@mckenzielake.com;
beth.mullin@mckenzielake.com; ben@sandgecko.ca; mariecanonaco@gmail.com;
kevin.remawest@gmail.com; kmiller@thriverealtygroup.ca; randhawahargy@gmail.com;
jsousa@bbo.on.ca; taxoffice@london.ca; BillingSupport@londonhydro.com; taxes@niagarafalls.ca;
water@niagarafalls.ca; insolvency.unit@ontario.ca; AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca;
dnuri@nurilaw.ca

Cc: Mark van Zandvoort <mvanzandvoort@airdberlis.com>; Kyle Plunkett <kplunkett@airdberlis.com>;
Calvin Horsten <chorsten@airdberlis.com>; Aleksandra Cupic <acupic@airdberlis.com>

Subject: RE: Mizue Fukiage et al. v. Clearview Garden Estates Inc. et al. / Court File No. CV-25-00736577-00CL

TO THE SERVICE LIST:

In connection with the case conference held today in the above-noted matter, please find attached the Endorsement of the Honourable Justice Myers.

Regards,

Roula Khairalla
Associate | Lawyer

T 416.865.7759
E rkhairalla@airdberlis.com

Aird & Berlis LLP
Toronto | Vancouver

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This email is intended only for the individual or entity named in the message. Please let us know if you have received this email in error.
If you did receive this email in error, the information in this email may be confidential and must not be disclosed to anyone.

From: Roula Khairalla <rkhairalla@airdberlis.com>

Sent: May 7, 2026 11:01 AM

To: mclachlana@bennettjones.com; shakram@bennettjones.com; fosterj@bennettjones.com;
ngoldstein@ksvadvisory.com; dsieradzki@ksvadvisory.com; jwong@ksvadvisory.com;
ttrifunovic@ksvadvisory.com; georgel@SimpsonWigle.com; mitchellk@SimpsonWigle.com;
adobrogeanu@rossmcbride.com; rob@forbeslaw.ca; jeff.larry@paliareroland.com;
ryan.shah@paliareroland.com; greg.roberts@roblaw.ca; dbadham@btrlaw.ca;
brennan@brartamber.com; elenasalv2000@yahoo.ca; vincentsalvatore@hotmail.com;
awygodny@wagnersidlofsky.com; ben@sandgecko.ca; randyhoffner66@gmail.com;
randyhoffner@adval.ca; mclachlana@bennettjones.com; fosterj@bennettjones.com;
clifton.prophet@gowlingwlg.com; asim.iqbal@gowlingwlg.com; patryk.sawicki@gowlingwlg.com;
carol.liu@gowlingwlg.com; helen@hg-law.org; william.fawcett@mckenzielake.com;
beth.mullin@mckenzielake.com; ben@sandgecko.ca; mariecanonaco@gmail.com;
kevin.remawest@gmail.com; kmiller@thriverealtygroup.ca; randhawahargy@gmail.com;
jsousa@bbo.on.ca; taxoffice@london.ca; BillingSupport@londonhydro.com; taxes@niagarafalls.ca;
water@niagarafalls.ca; insolvency.unit@ontario.ca; AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca;

dnuri@nurilaw.ca

Cc: Mark van Zandvoort <mvanzandvoort@airdberlis.com>; Kyle Plunkett <kplunkett@airdberlis.com>; Calvin Horsten <chorsten@airdberlis.com>; Aleksandra Cupic <acupic@airdberlis.com>

Subject: RE: Mizue Fukiage et al. v. Clearview Garden Estates Inc. et al. / Court File No. CV-25-00736577-00CL

TO THE SERVICE LIST:

Further to the below, kindly find attached the Aide-Mémoire of the Receiver, with respect to the Case Conference returnable via Zoom at 10 a.m. on Monday, May 11, 2026.

Should you wish to attend the Case Conference, please advise the undersigned.

Roula Khairalla

Associate | Lawyer

T 416.865.7759

E rkhairalla@airdberlis.com

Aird & Berlis LLP

Toronto | Vancouver

Aird & Berlis LLP operates as a multi-disciplinary practice.

This email is intended only for the individual or entity named in the message. Please let us know if you have received this email in error. If you did receive this email in error, the information in this email may be confidential and must not be disclosed to anyone.

From: Calvin Horsten <chorsten@airdberlis.com>

Sent: May 6, 2026 6:42 AM

To: mclachlana@bennettjones.com; shakram@bennettjones.com; fosterj@bennettjones.com; ngoldstein@ksvadvisory.com; dsieradzki@ksvadvisory.com; jwong@ksvadvisory.com; tttrifunovic@ksvadvisory.com; georgel@SimpsonWigle.com; mitchellk@SimpsonWigle.com; adobrogeanu@rossmcbride.com; rob@forbeslaw.ca; jeff.larry@paliareroland.com; ryan.shah@paliareroland.com; greg.roberts@roblaw.ca; dbadham@btrlaw.ca; brennan@brartamber.com; elenasalv2000@yahoo.ca; vincentsalvatore@hotmail.com; awygodny@wagnersidlofsky.com; ben@sandgecko.ca; randyhoffner66@gmail.com; randyhoffner@adval.ca; mclachlana@bennettjones.com; fosterj@bennettjones.com; clifton.prophet@gowlingwlg.com; asim.iqbal@gowlingwlg.com; patryk.sawicki@gowlingwlg.com; carol.liu@gowlingwlg.com; helen@hg-law.org; william.fawcett@mckenzielake.com; beth.mullin@mckenzielake.com; ben@sandgecko.ca; mariecanonaco@gmail.com; kevin.remawest@gmail.com; kmiller@thriverealtygroup.ca; randhawahargy@gmail.com; jsousa@bbo.on.ca; taxoffice@london.ca; BillingSupport@londonhydro.com; taxes@niagarafalls.ca; water@niagarafalls.ca; insolvency.unit@ontario.ca; AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca; dnuri@nurilaw.ca

Cc: Mark van Zandvoort <mvanzandvoort@airdberlis.com>; Kyle Plunkett <kplunkett@airdberlis.com>; Roula Khairalla <rkhairalla@airdberlis.com>; Aleksandra Cupic <acupic@airdberlis.com>

Subject: RE: Mizue Fukiage et al. v. Clearview Garden Estates Inc. et al. / Court File No. CV-25-00736577-00CL

TO THE SERVICE LIST:

Further to the below, please find available at the below link to a public electronic document exchange the Motion Record of the Receiver dated May 6, 2026, including: (i) the Amended Notice of Motion dated May 6, 2026; and (ii) the Fifth Report of the Receiver

dated May 5, 2026, all of which is hereby served upon you pursuant to the *Rules*. The Amended Notice of Motion is also attached to this e-mail as a standalone document.

Link: <https://airdberlis.sharefile.com/public/share/web-sc1c0e71d3e7e49d18eccd0108fda4c0a>

As detailed in the Amended Notice of Motion, the Receiver's motion will be scheduled at a Case Conference to be heard via Zoom at 10 a.m. on Monday, May 11, 2026. Should you wish to attend the Case Conference, please advise the undersigned and Aleksandra Cupic (acupic@airdberlis.com) by direct reply.

Thank you,

Calvin Horsten
Associate | Lawyer

T 416.865.3077
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From: Aleksandra Cupic <acupic@airdberlis.com>

Sent: April 13, 2026 3:39 PM

To: mclachlana@bennettjones.com; shakram@bennettjones.com; fosterj@bennettjones.com; ngoldstein@ksvadvisory.com; dsieradzki@ksvadvisory.com; jwong@ksvadvisory.com; ttirfunovic@ksvadvisory.com; Kyle Plunkett <kplunkett@airdberlis.com>; Mark van Zandvoort <mvanzandvoort@airdberlis.com>; Calvin Horsten <chorsten@airdberlis.com>; Roula Khairalla <rkhairalla@airdberlis.com>; georgel@SimpsonWigle.com; mitchellk@SimpsonWigle.com; adobrogeanu@rossmcbride.com; robef@forbeslaw.ca; jeff.larry@paliareroland.com; ryan.shah@paliareroland.com; greg.roberts@roblaw.ca; dbadham@btrlaw.ca; brennan@brartamber.com; elenasalv2000@yahoo.ca; vincentsalvatore@hotmail.com; awygodny@wagnersidlofsky.com; ben@sandgecko.ca; randyhoffner66@gmail.com; randyhoffner@adval.ca; mclachlana@bennettjones.com; fosterj@bennettjones.com; clifton.prophet@gowlingwlg.com; asim.iqbal@gowlingwlg.com; patryk.sawicki@gowlingwlg.com; carol.liu@gowlingwlg.com; helen@hg-law.org; william.fawcett@mckenzielake.com; beth.mullin@mckenzielake.com; ben@sandgecko.ca; mariecanonaco@gmail.com; kevin.remaxwest@gmail.com; kmiller@thriverealtygroup.ca; randhawahargy@gmail.com; jsousa@bbo.on.ca; taxoffice@london.ca; BillingSupport@londonhydro.com; taxes@niagarafalls.ca; water@niagarafalls.ca; insolvency.unit@ontario.ca; AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca; dnuri@nurilaw.ca

Subject: Mizue Fukiage et al. v. Clearview Garden Estates Inc. et al. / Court File No. CV-25-00736577-00CL

Dear Service List:

In connection with a case conference to be heard by Zoom videoconference on Monday, May 11, 2026 at 10:00 a.m. in the above-noted matter, please find attached the Receiver's Notice of Motion, served in accordance with the *Rules of Civil Procedure*.

Regards,

Aleksandra Cupic

Assistant to Codie Mitchell, Anisha Bhardwaj & Roula Khairalla

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MIZUE FUKIAGE, et al.
Applicant

- and -

CLEARVIEW GARDEN ESTATES INC., et al.
Respondents

Court File No. CV-25-00736577-00CL

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

Proceedings commenced at Toronto

**AIDE-MÉMOIRE OF THE RECEIVER
(Motion returnable on June 16, 2026)**

AIRD & BERLIS LLP

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Lawyers for the Receiver