



Court File No. CV-21-00673521-00CL

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

Electronically issued : 08-Apr-2022
Délivré par voie électronique
Toronto

THE HONOURABLE MADAM) THURSDAY, THE 7TH
)
JUSTICE CONWAY) DAY OF APRIL, 2022
)

ONTARIO SECURITIES COMMISSION

Applicant

- and -

GO-TO DEVELOPMENTS HOLDINGS INC., OSCAR FURTADO, FURTADO HOLDINGS INC., GO-TO DEVELOPMENTS ACQUISITIONS INC., GO-TO GLENDALE AVENUE INC., GO-TO GLENDALE AVENUE LP, GO-TO MAJOR MACKENZIE SOUTH BLOCK INC., GO-TO MAJOR MACKENZIE SOUTH BLOCK LP, GO-TO MAJOR MACKENZIE SOUTH BLOCK II INC., GO-TO MAJOR MACKENZIE SOUTH BLOCK II LP, GO-TO NIAGARA FALLS CHIPPAWA INC., GO-TO NIAGARA FALLS CHIPPAWA LP, GO-TO NIAGARA FALLS EAGLE VALLEY INC., GO-TO NIAGARA FALLS EAGLE VALLEY LP, GO-TO SPADINA ADELAIDE SQUARE INC., GO-TO SPADINA ADELAIDE SQUARE LP, GO-TO STONEY CREEK ELFRIDA INC., GO-TO STONEY CREEK ELFRIDA LP, GO-TO ST. CATHARINES BEARD INC., GO-TO ST. CATHARINES BEARD LP, GO-TO VAUGHAN ISLINGTON AVENUE INC., GO-TO VAUGHAN ISLINGTON AVENUE LP, AURORA ROAD LIMITED PARTNERSHIP and 2506039 ONTARIO LIMITED

Respondents

APPLICATION UNDER SECTIONS 126 AND 129 OF THE *SECURITIES ACT*, R.S.O. 1990, c. S.5, AS AMENDED

CLAIMS PROCEDURE ORDER

THIS MOTION, made by KSV Restructuring Inc., in its capacity as the Court-appointed receiver and manager (in such capacity, the “**Receiver**”), without security, of the real property listed on **Schedule “A”** hereto (the “**Real Property**”) and all the other assets, undertakings and properties of each of the parties listed on **Schedule “B”** hereto (the “**Receivership Respondents**”), including all the assets held in trust or required to be held in trust by or for any of the Receivership Respondents, or by their lawyers, agents and/or any other person, and all proceeds thereof (together with the Real Property, the “**Property**”), for an order approving a procedure for the determination and resolution of claims filed against the Receivership Respondents and authorizing the Receiver to administer the claims process in accordance with its terms, was heard this day by judicial videoconference via Zoom.

ON READING the Report of the Receiver dated March 29, 2022 (the “**Report**”), and on hearing the submissions of counsel for the Receiver and such other counsel as were present, no one appearing for any other person on the service list although duly served as appears from the affidavit of service of Susy Moniz sworn March 29, 2022,

SERVICE

1. **THIS COURT ORDERS** that the time for service 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.

DEFINITIONS

2. **THIS COURT ORDERS** that for the purposes of this Order, the following terms shall have the following meanings:

- (a) “**Acknowledgment of Investor Claim**” means an Acknowledgment of Investor Claim in substantially the same form attached as **Schedule “E”** hereto;
- (b) “**Appointment Date**” means December 10, 2021;
- (c) “**Appointment Order**” means the Order of The Honourable Mr. Justice Pattillo of the Court made December 10, 2021 in this proceeding;

- (d) **“Books and Records”** means, collectively:
- (i) the books and records provided to the Receiver by the Receivership Respondents, any of their associated corporations or any of their respective principals, agents or counsel; and
 - (ii) any and all instruments registered on title to or in respect of the Property (as defined in the Appointment Order) on or prior to the Appointment Date;
- (e) **“Business Day”** means a day, other than a Saturday, Sunday or a statutory holiday, on which banks are generally open for business in Toronto, Ontario;
- (f) **“Claim”** means:
- (i) other than an Investor Claim, any right of any Person against any of the Receivership Respondents in connection with any indebtedness, liability or obligation of any kind of any of the Receivership Respondents, whether liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, unsecured, present, future, known or unknown, by guarantee, surety or otherwise and whether or not such right is executory in nature, including the right or ability of any Person to advance a claim for contribution or indemnity or otherwise with respect to any matter, action, cause or chose in action, whether existing at present or commenced in the future that could be asserted by way of set-off, counterclaim or otherwise (each such Person being a **“Creditor”**), which indebtedness, liability or obligation is based in whole or in part on facts existing on or prior to the Appointment Date or which would have been claims provable in bankruptcy had the applicable Receivership Respondent, as the case may be, become bankrupt on the Appointment Date (each, a **“Creditor Claim”** and, collectively, the **“Creditor Claims”**); and
 - (ii) any claims of any Person against any of the Receivership Respondents derived from such Person’s investment by way of a subscription agreement involving any of the Receivership Respondents (each such Person being an

“**Investor**”), which right is based in whole or in part on facts existing on or prior to the Appointment Date or which would have been claims provable in bankruptcy on the Appointment Date (each, an “**Investor Claim**” and, together with the Creditor Claims, “**Claims**”),

provided, however, that no “**Claim**” shall include an Excluded Claim;

- (g) “**Claimant**” means any Person having a Claim and, for the avoidance of doubt, comprises any Creditor with a Creditor Claim and any Investor with an Investor Claim;
- (h) “**Claims Bar Date**” means 5:00 p.m. (Toronto time) on **June 2, 2022**, or any later date ordered by the Court;
- (i) “**Claims Package**” means a package of information to be provided by the Receiver, which package shall include a copy of the Claims Procedure Order, an Instruction Letter, a Proof of Claim (or, where applicable, an Acknowledgment of Investor Claim) and such other materials as the Receiver may consider appropriate or desirable;
- (j) “**Claims Procedure**” means the procedures outlined in this Order, including the Schedules;
- (k) “**Claims Procedure Order**” means this Order;
- (l) “**Court**” means the Ontario Superior Court of Justice (Commercial List);
- (m) “**Creditor**” has the meaning ascribed to that term in paragraph 2(f) of the Claims Procedure Order;
- (n) “**Excluded Claim**” means any claim secured by the Receiver’s Charge (as defined in the Appointment Order) and any claim secured by the Receiver’s Borrowings Charge (as defined in the Appointment Order);

- (o) “**Instruction Letter**” means a letter to Claimants regarding the Claims Procedure containing instructions regarding the completion and return of a Proof of Claim or a Request for Amendment of an Acknowledgment of Investor Claim, substantially in the form attached as **Schedule “D”** hereto;
- (p) “**Investor**” has the meaning ascribed to that term in paragraph 2(f) of the Claims Procedure Order;
- (q) “**Investor Claim**” has the meaning ascribed to that term in paragraph 2(f) of the Claims Procedure Order;
- (r) “**Investor Information**” means the information contained in the “Particulars of Claim” section of the Acknowledgment of Investor Claim, as such information may be amended by (i) a Request for Amendment that is accepted by the Receiver in accordance with paragraph 8 of the Claims Procedure Order or (ii) a resolution or determination in accordance with paragraphs 13-15 of the Claims Procedure Order;
- (s) “**Known Claimants**” means:
 - (i) those Creditors which the Books and Records disclose were owed monies as Creditors by one or more of the Receivership Respondents as of the Appointment Date and which monies remain unpaid in whole or in part;
 - (ii) those Investors which the Books and Records disclose owned units in one or more of the Receivership Respondents as of the Appointment Date and which units remain outstanding in whole or in part; and
 - (iii) any Person which commenced a legal proceeding against any of the Receivership Respondents which legal proceeding was commenced and served upon such Receivership Respondent(s) prior to the Appointment Date and is known to the Receiver as of the date of the Claims Procedure Order;
- (t) “**Notice of Dispute**” means a notice delivered to the Receiver by a Claimant disputing a Notice of Revision or Disallowance, which notice shall be substantially

in the form attached hereto as **Schedule “H”** and shall set out the reasons for the dispute;

- (u) **“Notice of Revision or Disallowance”** means a notice informing a Claimant that the Receiver has revised or disallowed all or any part of such Claimant’s Claim, which notice shall be substantially in the form attached hereto as **Schedule “G”** and shall set out the reasons for such revision and/or disallowance;
- (v) **“Notice to Claimants”** means the notice publicizing this Claims Procedure to be published in accordance with the Claims Procedure Order, substantially in the form of the notice attached as **Schedule “C”**;
- (w) **“Person”** means any individual, general or limited partnership, firm, association, joint venture, trust, entity, corporation, limited or unlimited liability company, unincorporated organization, trade union, pension plan administrator, pension plan regulator, governmental authority or agency, employee or other association, or any other juridical entity howsoever designated or constituted;
- (x) **“Proof of Claim”** means the form of Proof of Claim to be completed and filed by a Claimant setting forth its purported Claim, substantially in the form attached as **Schedule “F”**;
- (y) **“Proven Claim”** means the amount and classification of any Claimant’s Claim as finally determined in accordance with this Claims Procedure;
- (z) **“Receiver’s Website”** means <https://www.ksvadvisory.com/experience/case/go-to>; and
- (aa) **“Request for Amendment”** means an Investor’s request for the amendment of the Investor Information included in an Acknowledgment of Investor Claim, by completing and returning the “Request for Amendment” section in the Acknowledgment of Investor Claim provided by the Receiver to that Investor.

NOTICE TO CLAIMANTS AND OTHERS

3. THIS COURT ORDERS that:

- (a) the Receiver shall, no later than five Business Days following the making of the Claims Procedure Order, post a copy of the Claims Procedure Order (together with all Schedules) on the Receiver's Website;
- (b) the Receiver shall send to each of the Known Claimants (in each case, for which it has an address) a copy of the Claims Package by April 28, 2022;
- (c) the Receiver shall, by no later than April 28, 2022, cause to be published the Notice to Claimants in The Globe and Mail, National Edition; and
- (d) the Receiver shall, provided such request is received prior to the Claims Bar Date, deliver as soon as reasonably possible following receipt of a request therefor a copy of the Claims Package to any Person claiming to be a Claimant and requesting such material.

INVESTOR CLAIMS

4. THIS COURT ORDERS that the Receiver shall, where it considers it appropriate to do so, send to any Investor of any of the Receivership Respondents an Acknowledgment of Investor Claim, wherein the Receiver acknowledges an Investor Claim based on the Books and Records and sets out the information in such Books and Records relating to that Investor Claim. The Investor Information therein with respect to such Investor's Claim **shall be deemed confirmed in all respects by the Investor unless the Investor elects to complete and file a Request for Amendment, together with supporting documentation**, in which case (a) the Receiver shall review and consider the Request for Amendment and (b) the Receiver may accept the amendments requested, or revise or disallow them by way of Notice of Revision or Disallowance. Unless a Request for Amendment is received by the Receiver on or before the Claims Bar Date:

- (a) the Acknowledgment of Investor Claim and the Investor Information therein shall be final and binding on the Investor, and may be relied upon by the Receiver in valuing the Investor Claim for all purposes; and

- (b) the Investor shall be barred from making any Claim inconsistent with the information contained in the Acknowledgment of Investor Claim.

PROOFS OF CLAIM

5. **THIS COURT ORDERS** that all Claimants, **other than those Investors who have received an Acknowledgment of Investor Claim**, shall file with the Receiver a Proof of Claim by the Claims Bar Date. For greater certainty, any Investor wishing to assert a Claim on the basis of facts and circumstances other than those set out in an Acknowledgment of Investor Claim or a Request for Amendment shall file a Proof of Claim.

DEADLINE FOR FILING REQUEST FOR AMENDMENT OR PROOF OF CLAIM

6. **THIS COURT ORDERS** that all Requests for Amendment and all Proofs of Claim, together with supporting documentation in respect of such Claim, must be filed with the Receiver by prepaid ordinary mail, courier, personal delivery or electronic or digital transmission, so that such Request for Amendment or Proof of Claim is received by the Receiver by no later than the Claims Bar Date.

7. **THIS COURT ORDERS** that any Claimant that does not file a Request for Amendment or a Proof of Claim, together with supporting documentation in respect of such Claim,

- (a) shall be and is hereby forever barred from asserting or enforcing any such Claim, except to the extent that such Claim is based exclusively on Investor Information;
- (b) shall not be entitled to receive any distributions from any of the Receivership Respondents' estates in respect of such Claim, except to the extent that such Claim is based exclusively on Investor Information; and
- (c) shall not be entitled to any further notice in, and shall not be entitled to participate in this proceeding commenced by the Appointment Order, except to the extent that such notice or participation is based exclusively on Investor Information or an Excluded Claim.

DETERMINATION OF CLAIMS

8. **THIS COURT ORDERS** that the Receiver shall review all Requests for Amendment and all Proofs of Claim filed on or before the Claims Bar Date and may accept, revise or disallow (in whole or in part) the Investor Information set out in any Request for Amendment, and the amount and/or status of a Claim set out in any Proof of Claim. If the Receiver determines to revise or disallow a Request for Amendment or Claim, the Receiver shall send a Notice of Revision or Disallowance to the Claimant. At any time, the Receiver may request additional information with respect to any Claim (including in respect of any Acknowledgment of Investor Claim), and may request that the Claimant file a revised Request for Amendment or a revised Proof of Claim, as the case may be.

9. **THIS COURT ORDERS** that the Receiver may attempt to resolve the classification and amount of any Claim with the Claimant on a consensual basis prior to accepting, revising or disallowing such Claim.

10. **THIS COURT ORDERS** that where an Acknowledgment of Investor Claim or a Proof of Claim has been revised or disallowed (in whole or in part) by a Notice of Revision or Disallowance, the revised or disallowed portion of that Claim shall not establish a Proven Claim unless the Claimant has disputed the revision or disallowance in accordance with paragraph 11 of the Claims Procedure Order and proven the revised or disallowed Claim (or portion thereof) in accordance with paragraphs 13-15 of the Claims Procedure Order.

NOTICES OF DISPUTE

11. **THIS COURT ORDERS** that if a Claimant disputes the Notice of Revision or Disallowance and intends to contest the Notice of Revision or Disallowance then such Claimant shall deliver a Notice of Dispute by prepaid ordinary mail, courier, personal delivery or electronic or digital transmission so that such Notice of Dispute is received by the Receiver by no later than 5:00 p.m. (Toronto time) on the Business Day which is fourteen (14) days after delivery of the Notice of Revision or Disallowance or such later date as the Receiver may agree in writing or the Court may order. The filing of a Notice of Dispute with the Receiver within the time limited therefore shall constitute an application to have the amount or status of such Claim determined as set out in paragraphs 13-15 hereof.

12. **THIS COURT ORDERS** that where a Claimant that receives a Notice of Revision or Disallowance fails to file a Notice of Dispute with the Receiver within the time limited therefor, the amount and status of such Claimant's Claim shall be deemed to be as set out in the Notice of Revision or Disallowance and such amount and status, if any, shall constitute such Claimant's Proven Claim.

RESOLUTION OF CLAIMS

13. **THIS COURT ORDERS** that as soon as practicable after the delivery of the Notice of Dispute to the Receiver, the Receiver may:

- (a) attempt to resolve the classification and amount of the Claim with the Claimant on a consensual basis; and/or
- (b) schedule an appointment with the Court for the purpose of scheduling a motion to have the classification and/or amount of the Claim determined by the Court, and at such motion the Claimant shall be deemed to be the applicant and the Receiver shall be deemed to be the respondent.

14. **THIS COURT ORDERS** that notwithstanding the other provisions of this Order, the Receiver may make a motion to the Court for a final determination of a Claim at any time, whether or not a Notice of Revision or Disallowance has been sent by the Receiver.

15. **THIS COURT ORDERS** that in the event that the dispute between the Claimant and the Receiver is not settled within a time period or in a manner satisfactory to the Receiver or the Claimant, the Receiver or the Claimant may make a motion to the Court for the final determination of the Claimant's Claim.

ADEQUACY OF INFORMATION/CURRENCY

16. **THIS COURT ORDERS** that:

- (a) the Receiver may, where it is satisfied that a Claim has been adequately proven, waive strict compliance with the requirements of the Claims Procedure Order as to completion and execution of Requests for Amendment or Proofs of Claim; and

- (b) any Claims denominated in a currency other than Canadian dollars shall, for the purposes of the Claims Procedure Order, be converted to, and constitute obligations in, Canadian dollars, such calculation to be effected by the Receiver using the Bank of Canada noon spot rate on the Appointment Date.

NOTICE OF TRANSFEREES

17. **THIS COURT ORDERS** that the Receiver shall not be obligated to give notice to or otherwise deal with a transferee or assignee of a Claim as the Claimant in respect thereof unless:

- (a) actual written notice of transfer or assignment, together with satisfactory evidence of such transfer or assignment, shall have been received by the Receiver; and
- (b) the Receiver shall have acknowledged in writing such transfer or assignment,

and thereafter such transferee or assignee shall for the purposes hereof constitute the “Claimant” in respect of such Claim. Any such transferee or assignee of a Claim, and such Claim, shall be bound by any notices given or steps taken in respect of such Claim in accordance with the Claims Procedure Order prior to the written acknowledgement by the Receiver of such transfer or assignment.

18. **THIS COURT ORDERS** that if the holder of a Claim has transferred or assigned the whole of such Claim to more than one Person or part of such Claim to another Person or Persons, such transfer or assignment shall not create a separate Claim or Claims and such Claim shall continue to constitute and be dealt with as a single Claim notwithstanding such transfer or assignment, and the Receiver shall in each such case not be bound to acknowledge or recognize any such transfer or assignment and shall be entitled to give notices to and to otherwise deal with such Claim only as a whole and then only to and with the Person last holding such Claim in whole as the Claimant in respect of such Claim. Provided that a transfer or assignment of the Claim has taken place in accordance with paragraph 17 of the Claims Procedure Order and the Receiver has acknowledged in writing such transfer or assignment, the person last holding such Claim in whole as the Claimant in respect of such Claim may by notice in writing to the Receiver direct that subsequent dealings in respect of such Claim, but only as a whole, shall be with a specified Person and, in such event, such Claimant, such transferee or assignee of the Claim and the whole of such

Claim shall be bound by any notices given or steps taken in respect of such Claim by or with respect to such Person in accordance with the Claims Procedure Order.

19. **THIS COURT ORDERS** that the Receiver is under no obligation to give notice to any Person other than the Claimant holding the Claim and shall, without limitation, have no obligation to give notice to any Person holding a security interest, lien, or charge in, or a pledge or assignment by way of security in, a Claim.

20. **THIS COURT ORDERS** that the transferee or assignee of any Claim:

- (a) shall take the Claim subject to the rights and obligations of the transferor/assignor of the Claim, and subject to the rights of any of the Receivership Respondents against any such transferor or assignor, including any rights of set-off which any of the Receivership Respondents had against such transferor or assignor, and
- (b) cannot use any transferred or assigned claim to reduce any amount owing by the transferee or assignee to any of the Receivership Respondents, whether by way of set-off, application, merger, consolidation or otherwise.

PROTECTIONS FOR THE RECEIVER

21. **THIS COURT ORDERS** that in carrying out the terms of the Claims Procedure Order:

- (a) the Receiver shall have all the protections given to it by each of the Appointment Order and as an officer of this Court, as applicable, including the stay of proceedings in its favour;
- (b) the Receiver shall incur no liability or obligation as a result of the carrying out of the provisions of the Claims Procedure Order; and
- (c) the Receiver shall not be liable for any claims or damages resulting from any errors or omissions in the Books and Records.

DIRECTIONS

22. **THIS COURT ORDERS** that the Receiver may, at any time, and with such notice as this Court may require, seek directions from this Court with respect to the Claims Procedure Order, the Claims Procedure set out herein and the forms attached as Schedules hereto.

SERVICE AND NOTICE

23. **THIS COURT ORDERS** that the Receiver be at liberty to deliver the Claims Package, and any letters, notices or other documents to Claimants or other interested Persons, by forwarding true copies thereof by prepaid ordinary mail, courier, personal delivery or electronic or digital transmission to such Persons at the address as last shown on the records of the Receivership Respondents and that any such service or notice by courier, personal delivery or electronic or digital transmission shall be deemed to be received on the next Business Day following the date of forwarding thereof, or if sent by prepaid ordinary mail, on the fourth Business Day after mailing.

24. **THIS COURT ORDERS** that any notice or other communication (including, without limitation, Requests for Amendment, Proofs of Claim and Notices of Dispute) to be given under the Claims Procedure Order by a Claimant to the Receiver shall be in writing substantially in the form, if any, provided for in the Claims Procedure Order and will be sufficiently given only if given by prepaid ordinary mail, courier, personal delivery or electronic or digital transmission addressed to:

KSV Restructuring Inc.
in its capacity as the Court-appointed Receiver of the “Go-To” Receivership Respondents
150 King Street West, Suite 2308
Toronto, ON M5H 1J9

Attention: Jordan Wong
E-mail: jwong@ksvadvisory.com

Any such notice or other communication by a Claimant shall be deemed received only upon actual receipt thereof during normal business hours on a Business Day.

MISCELLANEOUS

25. **THIS COURT ORDERS** that this Claims Procedure Order does not and is not intended to provide for the calculation or methodology of determining distributions but solely for providing

a process for submitting and adjudicating Claims. The Receiver will request additional relief from this Court with respect to determining a final basis for calculating and determining ultimate distributions to Claimants.

26. **THIS COURT ORDERS** that Claims on behalf of any of the Receivership Respondents against any other of the Receivership Respondents shall be filed (or deemed filed, as the case may be) by the Receiver in amounts determined by the Receiver on the basis of the Books and Records or as otherwise determined by the Receiver, without the need for the Receiver to file Proofs of Claim with respect to such Claims and without the need for the Receiver to file any such Claims prior to the Claims Bar Date.

27. **THIS COURT ORDERS** that the Receiver may set off (whether by way of legal, equitable or contractual set-off) against the Claims of any Claimant, any claims of any nature whatsoever that any of the Receivership Respondents may have against such Claimant arising prior to the entry of this Claims Procedure Order, provided that such set-off satisfies the requirements for legal, equitable or contractual set-off to the extent permitted by applicable law as may be determined by the Court. If there is any dispute between the Receiver and the applicable Claimant, however, neither the failure to assert set-off nor the allowance of any Claim hereunder shall constitute a waiver or release by the Receiver of any such claim that the Receiver may have against such Claimant.

28. **THIS COURT ORDERS AND REQUESTS** the aid and recognition of any court of any judicial, regulatory or administrative body in any province or territory of Canada (including the assistance of any court in Canada) and any judicial, regulatory or administrative tribunal or other court constituted pursuant to the Parliament of Canada or the legislature of any province and any court or any judicial, regulatory or administrative body of the United States of America, and of any other nation or state, to act in aid of and to be complementary to this Court in carrying out the terms of this Order.



SCHEDULE "A"

REAL PROPERTY

1. 527 Glendale Avenue
St. Catharines, ON
PIN: 46415-0949
2. 185 Major MacKenzie Drive East
Richmond Hill, ON
PIN: 03139-0047
3. 197 Major MacKenzie Drive East
Richmond Hill, ON
PIN: 03139-0049
4. 209 Major MacKenzie Drive East
Richmond Hill, ON
PIN: 03139-0051
5. 191 Major MacKenzie Drive East
Richmond Hill, ON
PIN: 03139-0048
6. 203 Major MacKenzie Drive East
Richmond Hill, ON
PIN: 03139-0050
7. 215 Major MacKenzie Drive East
Richmond Hill, ON
PIN: 03139-0052
8. 4210 Lyons Creek Road
Niagara Falls, ON
PIN: 64258-0110
9. 4248 Lyons Creek Road
Niagara Falls, ON
PIN: 64258-0713
10. 2334 St. Paul Avenue
Niagara Falls, ON
PIN: 64269-0559
11. 355 Adelaide Street West
Toronto, ON
PIN: 21412-0150

12. 46 Charlotte Street
Toronto, ON
PIN: 21412-0151

13. Highland Road
Hamilton, ON
PIN: 17376-0025

14. Upper Centennial Parkway
Hamilton, ON
PIN: 17376-0111

15. 19 Beard Place
St. Catharines, ON
PIN: 46265-0022

16. 7386 Islington Avenue
Vaughan, ON
PIN: 03222-0909

17. 4951 Aurora Road
Stouffville, ON
PIN: 03691-0193

SCHEDULE “B”

RECEIVERSHIP RESPONDENTS

1. GO-TO DEVELOPMENTS HOLDINGS INC.
2. FURTADO HOLDINGS INC.
3. GO-TO DEVELOPMENTS ACQUISITIONS INC.
4. GO-TO GLENDALE AVENUE INC.
5. GO-TO GLENDALE AVENUE LP
6. GO-TO MAJOR MACKENZIE SOUTH BLOCK INC.
7. GO-TO MAJOR MACKENZIE SOUTH BLOCK LP
8. GO-TO MAJOR MACKENZIE SOUTH BLOCK II INC.
9. GO-TO MAJOR MACKENZIE SOUTH BLOCK II LP
10. GO-TO NIAGARA FALLS CHIPPAWA INC.
11. GO-TO NIAGARA FALLS CHIPPAWA LP
12. GO-TO NIAGARA FALLS EAGLE VALLEY INC.
13. GO-TO NIAGARA FALLS EAGLE VALLEY LP
14. GO-TO SPADINA ADELAIDE SQUARE INC.
15. GO-TO SPADINA ADELAIDE SQUARE LP
16. GO-TO STONEY CREEK ELFRIDA INC.
17. GO-TO STONEY CREEK ELFRIDA LP
18. GO-TO ST. CATHARINES BEARD INC.
19. GO-TO ST. CATHARINES BEARD LP
20. GO-TO VAUGHAN ISLINGTON AVENUE INC.
21. GO-TO VAUGHAN ISLINGTON AVENUE LP
22. AURORA ROAD LIMITED PARTNERSHIP
23. 2506039 ONTARIO LIMITED

SCHEDULE “C”

NOTICE TO CLAIMANTS

ONTARIO SECURITIES COMMISSION

Applicant

- and -

GO-TO DEVELOPMENTS HOLDINGS INC., OSCAR FURTADO, FURTADO HOLDINGS INC., GO-TO DEVELOPMENTS ACQUISITIONS INC., GO-TO GLENDALE AVENUE INC., GO-TO GLENDALE AVENUE LP, GO-TO MAJOR MACKENZIE SOUTH BLOCK INC., GO-TO MAJOR MACKENZIE SOUTH BLOCK LP, GO-TO MAJOR MACKENZIE SOUTH BLOCK II INC., GO-TO MAJOR MACKENZIE SOUTH BLOCK II LP, GO-TO NIAGARA FALLS CHIPPAWA INC., GO-TO NIAGARA FALLS CHIPPAWA LP, GO-TO NIAGARA FALLS EAGLE VALLEY INC., GO-TO NIAGARA FALLS EAGLE VALLEY LP, GO-TO SPADINA ADELAIDE SQUARE INC., GO-TO SPADINA ADELAIDE SQUARE LP, GO-TO STONEY CREEK ELFRIDA INC., GO-TO STONEY CREEK ELFRIDA LP, GO-TO ST. CATHARINES BEARD INC., GO-TO ST. CATHARINES BEARD LP, GO-TO VAUGHAN ISLINGTON AVENUE INC., GO-TO VAUGHAN ISLINGTON AVENUE LP, AURORA ROAD LIMITED PARTNERSHIP and 2506039 ONTARIO LIMITED

Respondents

APPLICATION UNDER SECTIONS 126 AND 129 OF THE *SECURITIES ACT*, R.S.O. 1990, c. S.5, AS AMENDED

RE: NOTICE OF CLAIMS PROCEDURE

PLEASE TAKE NOTICE that this notice is being published pursuant to an Order of the Ontario Superior Court of Justice (Commercial List) made April 7, 2022 (the “**Claims Procedure Order**”). The Claims Procedure Order was obtained by KSV Restructuring Inc., in its capacity as the Court-appointed receiver and manager (in such capacity, the “**Receiver**”) of all the Respondents in this proceeding except Oscar Furtado (all the other Respondents being the “**Receivership Respondents**”).

Subject to certain exceptions (as set out in the Claims Procedure Order), all the creditors and investors of the Receivership Respondents should have received a claims package by mail from the Receiver. The Claims Procedure Order and a claims package may also be obtained from the Receiver’s website at <https://www.ksvadvisory.com/experience/case/go-to> or by contacting Mr.

Jordan Wong at the Receiver's office by telephone at (416) 932-6025 or by email at jwong@ksvadvisory.com.

Completed documents must be received by the Receiver by 5:00 p.m. (Toronto time) on June 2, 2022 (the "Claims Bar Date"). It is your responsibility to complete the appropriate documents and ensure that the Receiver receives your completed documents by the Claims Bar Date.

Investors do not need to file a Proof of Claim if they have received an Acknowledgment of Investor Claim from the Receiver and agree with the amount of their claim as stated therein. Please consult the Claims Procedure Order made on April 7, 2022 for details with respect to this and other exemptions.

CLAIMS WHICH ARE NOT RECEIVED BY THE CLAIMS BAR DATE WILL BE BARRED AND EXTINGUISHED FOREVER.

DATED at Toronto this ____ day of _____, 2022.

SCHEDULE “D”

INSTRUCTION LETTER FOR THE CLAIMS PROCEDURE

ONTARIO SECURITIES COMMISSION

Applicant

- and -

GO-TO DEVELOPMENTS HOLDINGS INC., OSCAR FURTADO, FURTADO HOLDINGS INC., GO-TO DEVELOPMENTS ACQUISITIONS INC., GO-TO GLENDALE AVENUE INC., GO-TO GLENDALE AVENUE LP, GO-TO MAJOR MACKENZIE SOUTH BLOCK INC., GO-TO MAJOR MACKENZIE SOUTH BLOCK LP, GO-TO MAJOR MACKENZIE SOUTH BLOCK II INC., GO-TO MAJOR MACKENZIE SOUTH BLOCK II LP, GO-TO NIAGARA FALLS CHIPPAWA INC., GO-TO NIAGARA FALLS CHIPPAWA LP, GO-TO NIAGARA FALLS EAGLE VALLEY INC., GO-TO NIAGARA FALLS EAGLE VALLEY LP, GO-TO SPADINA ADELAIDE SQUARE INC., GO-TO SPADINA ADELAIDE SQUARE LP, GO-TO STONEY CREEK ELFRIDA INC., GO-TO STONEY CREEK ELFRIDA LP, GO-TO ST. CATHARINES BEARD INC., GO-TO ST. CATHARINES BEARD LP, GO-TO VAUGHAN ISLINGTON AVENUE INC., GO-TO VAUGHAN ISLINGTON AVENUE LP, AURORA ROAD LIMITED PARTNERSHIP and 2506039 ONTARIO LIMITED

Respondents

APPLICATION UNDER SECTIONS 126 AND 129 OF THE *SECURITIES ACT*, R.S.O. 1990, c. S.5, AS AMENDED

A. CLAIMS PROCEDURE

By Order of the Ontario Superior Court of Justice (Commercial List) made April 7, 2022 (the “**Claims Procedure Order**”), KSV Restructuring Inc., the Court-appointed receiver and manager (in such capacity, the “**Receiver**”) of all the Respondents except Oscar Furtado (all the other Respondents being the “**Receivership Respondents**”), has been authorized to conduct a claims procedure (the “**Claims Procedure**”) for the determination of certain claims against all the Receivership Respondents.

This letter provides instructions for understanding the Acknowledgment of Investor Claim and completing a Request for Amendment or Proof of Claim, as applicable. Please note that capitalized

terms which are not defined in this Instruction Letter shall have the meanings ascribed to them in the Claims Procedure Order.

The Claims Procedure is intended for any Person with any Claim of any kind or nature whatsoever, other than an Excluded Claim, whether unliquidated, contingent or otherwise against one or more of the Receivership Respondents that arose on or prior to December 10, 2021. **Please note that the Receiver is not appointed over, and the Claims Procedure therefore does not apply to claims against, Oscar Furtado.** Please review the Claims Procedure Order on the Receiver's Website (<https://www.ksvadvisory.com/experience/case/go-to>) for the complete definition of Claim and Excluded Claim.

If you have any questions regarding the Claims Procedure, please consult the Receiver's Website or contact the Receiver at the address provided below.

All notice and enquiries with respect to the Claims Procedure should be addressed to:

KSV Restructuring Inc.
in its capacity as the Court-appointed Receiver of the "Go-To" Receivership Respondents
150 King Street West, Suite 2308
Toronto, ON M5H 1J9

Attention: Jordan Wong
E-mail: jwong@ksvadvisory.com

B. INVESTOR CLAIMS

The Receiver may have sent to you an Acknowledgment of Investor Claim, wherein the Receiver acknowledges the amount of your **Investor Claim** and sets out other information related to your Investor Claim, all based on information concerning your Investor Claim that was obtained from a review of the existing books and records of the Receivership Respondents. **If you agree with the information described in such Acknowledgment of Investor Claim, you do not have to take any further steps in respect of the Investor Claim described therein. However, if you disagree with any information described in the Acknowledgment of Investor Claim, then you must file a Request for Amendment, which must be received by 5:00 p.m. (Toronto time) on June 2, 2022, the Claims Bar Date. Pursuant to the Claims Procedure Order, failure to submit a Request for Amendment by the Claims Bar Date will result in your Investor Claim being a Proven Claim in the amount determined by the Receiver on the Acknowledgment of Investor Claim, although having a Proven Claim will not necessarily result in a distribution from the Receiver.**

If you believe that you have an Investor Claim but have not received an Acknowledgment of Investor Claim from the Receiver in respect of that Investor Claim, then you must complete and submit a Proof of Claim to the Receiver; which must be received by the Receiver by 5:00 p.m. (Toronto time) on the Claims Bar Date of June 2, 2022 (and failure to do so will result in your Investor Claim being barred and extinguished, released and discharged forever, as set out in the Claims Procedure Order).

C. CREDITOR CLAIMS

If you believe that you have a **Creditor Claim** against any of the Receivership Respondents, **you must file a Proof of Claim with the Receiver. Your Proof of Claim must be received by 5:00 p.m. (Toronto time) on the Claims Bar Date of June 2, 2022. Pursuant to the Claims Procedure Order, failure to submit a Proof of Claim by the Claims Bar Date will result in such Creditor Claim being barred and extinguished, released and discharged forever.**

FOR CLAIMANTS SUBMITTING A PROOF OF CLAIM

Additional Proof of Claim forms and other information, including the Claims Procedure Order, can be obtained from the Receiver's Website at <https://www.ksvadvisory.com/experience/case/goto>, or by contacting the Receiver at the telephone number or email address indicated above and providing particulars as to your name, address and contact information.

It is your responsibility to ensure that the Receiver receives your Request for Amendment or your Proof of Claim, as the case may be, by the Claims Bar Date.

SCHEDULE “E”

**ACKNOWLEDGMENT OF INVESTOR CLAIM PURSUANT TO
CLAIMS PROCEDURE ORDER, DATED APRIL 7, 2022**

Please read the enclosed Instruction Letter carefully prior to responding to this Acknowledgment of Investor Claim.

ACKNOWLEDGMENT OF INVESTOR CLAIM AGAINST ONE OR MORE OF:

**GO-TO DEVELOPMENTS HOLDINGS INC.
 (“GO-TO HOLDINGS CO.”);**

**FURTADO HOLDINGS INC.
 (“FURTADO HOLDINGS CO.”);**

**GO-TO DEVELOPMENTS ACQUISITIONS INC.
 (“GO-TO ACQUISITIONS CO.”);**

**GO-TO GLENDALE AVENUE INC.
 (“GO-TO GLENDALE CO.”);**

**GO-TO GLENDALE AVENUE LP
 (“GO-TO GLENDALE LP”);**

**GO-TO MAJOR MACKENZIE SOUTH BLOCK INC.
 (“GO-TO MAJOR MACKENZIE I CO.”);**

**GO-TO MAJOR MACKENZIE SOUTH BLOCK LP
 (“GO-TO MAJOR MACKENZIE I LP”);**

**GO-TO MAJOR MACKENZIE SOUTH BLOCK II INC.
 (“GO-TO MAJOR MACKENZIE II CO.”);**

**GO-TO MAJOR MACKENZIE SOUTH BLOCK II LP
 (“GO-TO MAJOR MACKENZIE II LP”);**

**GO-TO NIAGARA FALLS CHIPPAWA INC.
 (“GO-TO CHIPPAWA CO.”);**

**GO-TO NIAGARA FALLS CHIPPAWA LP
 (“GO-TO CHIPPAWA LP”);**

**GO-TO NIAGARA FALLS EAGLE VALLEY INC.
 (“GO-TO EAGLE VALLEY CO.”);**

GO-TO NIAGARA FALLS EAGLE VALLEY LP
("GO-TO EAGLE VALLEY LP");

GO-TO SPADINA ADELAIDE SQUARE INC.
("GO-TO ADELAIDE CO.");

GO-TO SPADINA ADELAIDE SQUARE LP
("GO-TO ADELAIDE LP");

GO-TO STONEY CREEK ELFRIDA INC.
("GO-TO STONEY CREEK CO.");

GO-TO STONEY CREEK ELFRIDA LP
("GO-TO STONEY CREEK LP");

GO-TO ST. CATHARINES BEARD INC.
("GO-TO ST. CATHARINES CO.");

GO-TO ST. CATHARINES BEARD LP
("GO-TO ST. CATHARINES LP");

GO-TO VAUGHAN ISLINGTON AVENUE INC.
("GO-TO VAUGHAN CO.");

GO-TO VAUGHAN ISLINGTON AVENUE LP
("GO-TO VAUGHAN LP");

AURORA ROAD LIMITED PARTNERSHIP
("AURORA CO."); and

2506039 ONTARIO LIMITED
("250 CO.", and collectively, the "Receivership Respondents")

TO: [FULL NAME AND ADDRESS OF INVESTOR]

PARTICULARS OF INVESTOR CLAIM:

The books and records provided to the Receiver indicate that you have an Investor Claim as a result of your investment that you made in or through one of the Receivership Respondents, the details of which are as follows:

Acknowledgement Number: _____

Full Legal Name of Investor: _____

Full Mailing Address: _____

Dollar Amount of Outstanding Principal of Investment: _____
(the Receiver will calculate any interest owing)

Claim against which Receivership Respondent(s): _____

ACTION REQUIRED:

If you agree with all of the information set out above, you do not have to take any further steps. If, however, you disagree with this information in any respect, then you must submit a Request for Amendment by the time and date set out below.

FILING OF REQUEST FOR AMENDMENT

If you disagree with the information set out above in any respect, then you must complete the section below entitled “Request for Amendment” and return a copy of this document, together with supporting documentation, by prepaid ordinary mail, courier, personal delivery or electronic or digital transmission so as to be received by the Receiver by 5:00 p.m. (Toronto time) on June 2, 2022 (the “Claims Bar Date”) at the following address:

KSV Restructuring Inc.
in its capacity as the Court-appointed Receiver of the “Go-To” Receivership
Respondents
150 King Street West, Suite 2308
Toronto, ON M5H 1J9

Attention: Jordan Wong
E-mail: jwong@ksvadvisory.com

If you do not timely submit a Request for Amendment to the Receiver, (i) this Acknowledgment of Investor Claim and the information herein shall become final and binding on you, and may be relied upon in valuing your Claim for all purposes, and (ii) you shall be barred from making any Claim inconsistent with the information contained in this Acknowledgment of Investor Claim.

It is your responsibility to ensure that the Receiver receives your Request for Amendment by the Claims Bar Date.

REQUEST FOR AMENDMENT:

I, _____

[name of Investor or Representative of the Investor] of _____

do hereby request that the information provided in this Acknowledgment of Investor Claim be amended as follows:

[PLEASE INDICATE THE SPECIFIC AMENDMENTS REQUESTED, AND PROVIDE SUPPORTING DOCUMENTATION].

Please note that the Receiver is not appointed over, and the Claims Procedure therefore does not apply to claims against, Oscar Furtado.

SCHEDULE “F”

**PROOF OF CLAIM, PURSUANT TO THE CLAIMS PROCEDURE ORDER MADE
APRIL 7, 2022, AGAINST:**

**GO-TO DEVELOPMENTS HOLDINGS INC.
 (“GO-TO HOLDINGS CO.”);**

**FURTADO HOLDINGS INC.
 (“FURTADO HOLDINGS CO.”);**

**GO-TO DEVELOPMENTS ACQUISITIONS INC.
 (“GO-TO ACQUISITIONS CO.”);**

**GO-TO GLENDALE AVENUE INC.
 (“GO-TO GLENDALE CO.”);**

**GO-TO GLENDALE AVENUE LP
 (“GO-TO GLENDALE LP”);**

**GO-TO MAJOR MACKENZIE SOUTH BLOCK INC.
 (“GO-TO MAJOR MACKENZIE I CO.”);**

**GO-TO MAJOR MACKENZIE SOUTH BLOCK LP
 (“GO-TO MAJOR MACKENZIE I LP”);**

**GO-TO MAJOR MACKENZIE SOUTH BLOCK II INC.
 (“GO-TO MAJOR MACKENZIE II CO.”);**

**GO-TO MAJOR MACKENZIE SOUTH BLOCK II LP
 (“GO-TO MAJOR MACKENZIE II LP”);**

**GO-TO NIAGARA FALLS CHIPPAWA INC.
 (“GO-TO CHIPPAWA CO.”);**

**GO-TO NIAGARA FALLS CHIPPAWA LP
 (“GO-TO CHIPPAWA LP”);**

**GO-TO NIAGARA FALLS EAGLE VALLEY INC.
 (“GO-TO EAGLE VALLEY CO.”);**

**GO-TO NIAGARA FALLS EAGLE VALLEY LP
 (“GO-TO EAGLE VALLEY LP”);**

**GO-TO SPADINA ADELAIDE SQUARE INC.
 (“GO-TO ADELAIDE CO.”);**

GO-TO SPADINA ADELAIDE SQUARE LP
("GO-TO ADELAIDE LP");

GO-TO STONEY CREEK ELFRIDA INC.
("GO-TO STONEY CREEK CO.");

GO-TO STONEY CREEK ELFRIDA LP
("GO-TO STONEY CREEK LP");

GO-TO ST. CATHARINES BEARD INC.
("GO-TO ST. CATHARINES CO.");

GO-TO ST. CATHARINES BEARD LP
("GO-TO ST. CATHARINES LP");

GO-TO VAUGHAN ISLINGTON AVENUE INC.
("GO-TO VAUGHAN CO.");

GO-TO VAUGHAN ISLINGTON AVENUE LP
("GO-TO VAUGHAN LP");

AURORA ROAD LIMITED PARTNERSHIP
("AURORA CO."); and

2506039 ONTARIO LIMITED
("250 CO.", and collectively, the "Receivership Respondents")

A. PARTICULARS OF CLAIMANT:

1. Full Legal Name of Claimant: _____
2. Full Mailing Address of the Claimant (the original Claimant and not the Assignee):

3. Telephone number: _____
4. E-mail address: _____
5. Facsimile number: _____
6. Attention (Contact Person): _____

7. Has the Claim been sold or assigned by the Claimant to another party [check (✓) one]?

Yes: _____ No: _____

B. PARTICULARS OF ASSIGNEE(S) (IF ANSWER TO QUESTION 7 IS YES):

8. Full Legal Name of Assignee(s): _____

(If Claim has been assigned, insert full legal name of assignee(s) of Claim (if all or a portion of the Claim has been sold). If there is more than one assignee, please attach a separate sheet with the require information)

9. Full Mailing Address of Assignee(s):

10. Telephone number of Assignee(s): _____

11. E-mail address: _____

12. Facsimile number: _____

13. Attention (Contact Person): _____

C. PROOF OF CLAIM:

I, _____
[name of Claimant or Representative of the Claimant],

of _____ do hereby certify that:
[City and Province]

(a) I [check (✓) one]

am the Claimant; OR

am _____ (state position or title) of the Claimant;

(b) I have knowledge of all the circumstances connected with the Claim referred to below;

(c) the Claimant has a Claim against one of the Receivership Respondents as follows
(please note that the Receiver is not appointed over, and the Claims Procedure therefore does not apply to claims against, Oscar Furtado):

(i) TYPE OF CLAIM [check (✓) and complete one]

Creditor Claim, in the amount of CDN\$ _____

(Claims in a foreign currency are to be converted to Canadian Dollars at the Bank of Canada noon spot rate as at December 10, 2021. The Canadian Dollar/U.S. Dollar rate of exchange on that date was CDN\$1.2714/US\$1.00).

Investor Claim in respect of which an Acknowledgment of Investor Claim was not received by the Claimant, in the principal investment amount of CDN\$ _____

(Claims in a foreign currency are to be converted to Canadian Dollars at the Bank of Canada noon spot rate as at December 10, 2021. The Canadian Dollar/U.S. Dollar rate of exchange on that date was CDN\$1.2714/US\$1.00).

(ii) CLAIM IS AGAINST THE FOLLOWING ENTITY [check (✓) one]

Go-To Holdings Co.;

Furtado Holdings Co.;

Go-To Acquisitions Co.;

Go-To Glendale Co.;

Go-To Glendale LP;

Go-To Major Mackenzie I Co.;

Go-To Major Mackenzie I LP;

Go-To Major Mackenzie II Co.;

Go-To Major Mackenzie II LP;

Go-To Chippawa Co.;

Go-To Chippawa LP;

Go-To Eagle Valley Co.;

Go-To Eagle Valley LP;

Go-To Adelaide Co.;

Go-To Adelaide LP;

Go-To Stoney Creek Co.;

- Go-To Stoney Creek LP;
- Go-To St. Catharines Co.;
- Go-To St. Catharines LP;
- Go-To Vaughan Co.;
- Go-To Vaughan LP;
- Aurora Co.; OR
- 250 Co.

(iii) IF THE CLAIM IS A **CREDITOR CLAIM ONLY**, ITS NATURE IS
[check (✓) one and complete appropriate category]

A secured claim of \$_____ (please state principal amount only – the Receiver will calculate any interest owing).

That in respect of this secured debt, I hold security valued at \$_____ particulars of which are as follows:

(Give full particulars of the security, including the date on which the security was given and the value at which you assess the security, and attach a copy of the security documents.)

An unsecured claim of \$_____ (please state principal amount only).

That in respect of this unsecured debt, I do not hold any security and [check (✓) appropriate description]

Regarding the amount of \$_____, I do not claim a right to a priority.

Regarding the amount of \$_____, I claim a right to a priority under section 136 of the *Bankruptcy and Insolvency Act* (Canada) (the “**BIA**”) or would claim such a priority if this Proof of Claim were being filed in accordance with the BIA.

(Set out on an attached sheet details to support priority claim.)

D. PARTICULARS OF CLAIM:

Other than as already set out herein the particulars of the undersigned’s total Claim are attached.

(Provide all particulars of the Claim and supporting documentation, including amount, description of transaction(s) or agreement(s) giving rise to the Claim, name of any guarantor which has guaranteed the Claim, and amount of invoices, particulars of all credits, discounts, etc. claimed, description of the security, if any, granted by the Receivership Respondents to the Claimant and estimated value of such security, and particulars of any interim period claim.)

This Proof of Claim must be received by the Receiver by no later than 5:00 p.m. (Toronto time) on June 2, 2022 (“Claims Bar Date”), by prepaid ordinary mail, courier, personal delivery or electronic or digital transmission at the following address:

KSV Restructuring Inc.
in its capacity as the Court-appointed Receiver of the “Go-To” Receivership
Respondents
150 King Street West, Suite 2308
Toronto, ON M5H 1J9

Attention: Jordan Wong
E-mail: jwong@ksvadvisory.com

E. FILING OF CLAIM:

Failure to file your Proof of Claim as directed by the Claims Bar Date will result in your Claim being barred and in you being prevented from making or enforcing such Claim against the Receivership Respondents. In addition, you shall not be entitled to any further notice in, and shall not be entitled to participate in these proceedings, except to the extent that such notice or participation is based exclusively on Investor Information or an Excluded Claim (as both terms are defined in the Claims Procedure Order).

F. ACKNOWLEDGED CLAIM:

If your Claim has already been acknowledged by an Acknowledgment of Investor Claim delivered to you by the Receiver, you do not need to file a Proof of Claim. If you disagree with any information in that Acknowledgment of Investor Claim, then you should file a Request for Amendment.

G. EXCLUDED CLAIMS

Claims secured by the Receiver’s Charge (as defined in the Appointment Order made in these proceedings on December 10, 2021 (the “**Appointment Order**”)) and claims secured by the Receiver’s Borrowings Charge (as defined in the Appointment Order) are all Excluded Claims and no person needs to file any claim in respect thereof at this time. **Please note that the Receiver is not appointed over, and the Claims Procedure therefore does not apply to claims against, Oscar Furtado.**

Dated at _____ this _____ day of _____, 2022.

Signature of Claimant

SCHEDULE “G”

**NOTICE OF REVISION OR DISALLOWANCE OF CLAIM
REFERENCE NUMBER _____**

Please read carefully the Instruction Letter accompanying this Notice.

TO: [insert name of claimant]

KSV Restructuring Inc., in its capacity as the court-appointed receiver and manager (in such capacity, the “**Receiver**”) named in the Appointment Order of The Honourable Mr. Justice Pattillo of the Ontario Superior Court of Justice (Commercial List) made December 10, 2021 (the “**Appointment Order**”), hereby gives you notice that the Receiver has reviewed your Request for Amendment or your Proof of Claim, as the case may be, and has revised or rejected your Claim or any part thereof or any information relating thereto, as follows:

Request for Amendment as Submitted (if applicable)	The Proof of Claim as Submitted (if applicable)	The Claim/Information as Accepted

Reasons for Revision or Disallowance:

[insert explanation]

If you do not agree with this Notice of Revision or Disallowance, please take notice of the following:

1. **If you dispute this Notice of Revision or Disallowance, you must, no later than 5:00 p.m. (Toronto time) on [_____], being the Business Day which is fourteen days after the Notice of Revision or Disallowance is sent by the Receiver (see paragraph 11 of the Claims Procedure Order), notify the Receiver by delivery of a Notice of Dispute in accordance with the accompanying Instruction Letter. The form of Notice of Dispute is enclosed.**
2. **IF YOU DO NOT DELIVER A NOTICE OF DISPUTE WITHIN THE PRESCRIBED TIME PERIOD, THIS NOTICE OF REVISION OR DISALLOWANCE WILL BE BINDING UPON YOU AND YOUR CLAIM SHALL BE DEEMED TO BE AS SET OUT IN THIS NOTICE OF REVISION OR DISALLOWANCE.**

DATED at Toronto, this _____, day of _____, 2022.

**KSV RESTRUCTURING INC.,
SOLELY IN ITS CAPACITY AS THE COURT-APPOINTED RECEIVER AND
MANAGER OF THE RECEIVERSHIP RESPONDENTS, AS DEFINED IN THE
APPOINTMENT ORDER**

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

Proceedings commenced at Toronto

CLAIMS PROCEDURE ORDER

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Lawyers for the Receiver