

Court File No.: CV-17-11689-00CL
Court File No.: CV-17-589078-00CL
Court File No.: CV-16-11567-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE RECEIVERSHIP OF SCOLLARD DEVELOPMENT CORPORATION, MEMORY CARE INVESTMENTS (KITCHENER) LTD., MEMORY CARE INVESTMENTS (OAKVILLE) LTD., 1703858 ONTARIO INC., LEGACY LANE INVESTMENTS LTD., TEXTBOOK (525 PRINCESS STREET) INC., AND TEXTBOOK (555 PRINCESS STREET) INC.

AND IN THE MATTER OF THE RECEIVERSHIP OF TEXTBOOK (445 PRINCESS STREET) INC.

AND IN THE MATTER OF THE RECEIVERSHIP OF TEXTBOOK ROSS PARK INC., TEXTBOOK (774 BRONSON AVENUE) INC. AND MCMURRAY STREET INVESTMENTS INC.

MOTION RECORD OF THE COURT-APPOINTED RECEIVER
VOLUME 2 OF 3
(Returnable April 21, 2023)

April 12, 2023

BENNETT JONES LLP
3400 One First Canadian Place
P.O. Box 130
Toronto, ON M5X 1A4

Sean Zweig (LSO# 57307I)
Jonathan Bell (LSO# 55457P)
Joseph N. Blinick (LSO# 64325B)
Joshua Foster (LSO# 79447K)

Lawyers for KSV Restructuring Inc., in its capacity as the Court-appointed Receiver of certain property of Scollard Development Corporation, Memory Care Investments (Kitchener) Ltd., Memory Care Investments (Oakville) Ltd., 1703858 Ontario Inc., Legacy Lane Investments Ltd., Textbook (525 Princess Street) Inc., Textbook (555 Princess Street) Inc., Textbook (445 Princess Street) Inc., Textbook (774 Bronson Avenue) Inc., Textbook Ross Park Inc. and McMurray Street Investments Inc.

TO: THE SERVICE LISTS

SERVICE LIST
CV-16-11567-00CL
(Current as of April 12, 2023)

TO: THE SUPERINTENDENT OF FINANCIAL SERVICES
25 Sheppard Avenue West, Suite 100
Toronto, ON
M2N 6S6

Tel: (416) 590-7143

Fax: (416) 590-7556

Mark Bailey

Email: mark.bailey@fSCO.gov.on.ca

Troy Harrison

Email: troy.harrison@fSCO.gov.on.ca

Sylvia (Vymyslicky) Ezeard

Email: sylvia.vymyslicky@fsrao.ca

Lawyers for the Applicant, The Superintendent of Financial Services

AND TO: GRANT THORNTON LIMITED
19th Floor, Royal Bank Plaza
South Tower, 200 Bay Street
Toronto, ON M5J 2P9

Jonathan Krieger

Tel: (416) 360-5055

Email: jonathan.krieger@ca.gt.com

Court-appointed Trustee

AND TO: AIRD & BERLIS LLP
Barristers and Solicitors
Brookfield Place
Suite 1800, 181 Bay Street
Toronto, ON M5J 2T9

Steven L. Graff
Tel: (416) 865-7726
Fax: (416) 863-1515
Email: sgraff@airdberlis.com

Ian Aversa
Tel: (416) 865-3082
Fax: (416) 863-1515
Email: iaversa@airdberlis.com

Jeremy Nemers
Tel: (416) 865-7724
Fax: (416) 863-1515
Email: jnemers@airdberlis.com

Miranda Spence
Tel: (416) 865-3414
Fax: (416) 863-1515
Email: mspence@airdberlis.com

Lawyers for the Court-appointed Trustee

AND TO: KSV RESTRUCTURING INC.
220 Bay Street, 13th Floor
P.O. Box 20
Toronto, ON M5J 2W4

Bobby Kofman
Tel: (416) 932-6228
Fax: (416) 932-6266
Email: bkofman@ksvadvisory.com

Noah Goldstein
Tel: (416) 932-6207
Fax: (416) 932-6266
Email: ngoldstein@ksvadvisory.com

The Court-appointed Receiver

AND TO: BENNETT JONES LLP
3400 One First Canadian Place, P.O. Box 130
Toronto, ON M5X 1A4

Sean Zweig
Tel: (416) 777-6254
Fax: (416) 863-1716
Email: zweigs@bennettjones.com

Jonathan Bell
Tel: (416) 777-6511
Fax: (416) 863-1716
Email: bellj@bennettjones.com

Joseph Blinick
Tel: (416) 777-4828
Fax: (416) 863-1716
Email: blinickj@bennettjones.com

Joshua Foster
Tel: (416) 777-7906
Fax: (416) 863-1716
Email: fosterj@bennettjones.com

Lawyers for the Court-appointed Receiver

AND TO: RUBIN & CHRISTIE LLP
Lawyers
2nd Floor, 219 Finch Avenue West
Toronto, ON M2R 1M2

Douglas Christie
Tel: (416) 361-0900
Fax: (416) 361-3459
Email: dchristie@rubinchristie.ca

Lawyers for Textbook Student Suites (525 Princess Street) Inc., Textbook Student Suites (555 Princess Street) Inc., Textbook Student Suites (Ross Park) Inc., Textbook Student Suites (Ross Park) Inc., Textbook Student Suites (774 Bronson Avenue) Inc. and Textbook Student Suites (445 Princess Street) Inc.

AND TO: DLA PIPER (CANADA) LLP
1 First Canadian Place, Suite 6000
100 King Street West
Toronto, ON M5X 1E2

Edmond Lamek
Tel: (416) 365-3444
Fax: (416) 365-7886
Email: edmond.lamek@dlapiper.com

Danny Nunes
Tel: (416) 365-3421
Fax: (416) 365-7886
Email: danny.nunes@dlapiper.com

Lawyers for Textbook Student Suites (525 Princess Street) Inc., Textbook Student Suites (555 Princess Street) Inc., Textbook Student Suites (Ross Park) Inc., Textbook Student Suites (774 Bronson Avenue) Inc., Textbook Student Suites (445 Princess Street) Inc., Memory Care Investments (Oakville) Ltd., Memory Care Investments (Burlington) Ltd., Memory Care Investments (Kitchener) Ltd., Legacy Lane Investments Inc. and Scollard Development Corporation

AND TO: JOHN DAVIES
Email: johndavies55@rogers.com

AND TO: JUDITH DAVIES
Email: Judydavies67@rogers.com

AND TO: TEXTBOOK STUDENT SUITES (525 PRINCESS STREET) TRUSTEE CORPORATION
2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: TEXTBOOK STUDENT SUITES (555 PRINCESS STREET) TRUSTEE CORPORATION
2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: TEXTBOOK STUDENT SUITES (ROSS PARK) TRUSTEE CORPORATION
2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: 2223947 ONTARIO LIMITED
7 Bowan Court
Toronto, ON M2K 3A8

AND TO: MC TRUSTEE (KITCHENER) LTD.

2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: SCOLLARD TRUSTEE CORPORATION

2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: TEXTBOOK STUDENT SUITES (774 BRONSON AVENUE) TRUSTEE CORPORATION

2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: 7743718 CANADA INC.

2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: TEXTBOOK STUDENT SUITES (445 PRINCESS STREET) TRUSTEE CORPORATION

2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: HAZELTON 4070 DIXIE ROAD TRUSTEE CORPORATION

2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: KEELE MEDICAL TRUSTEE CORPORATION

2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: DEPARTMENT OF JUSTICE

120 Adelaide Street West, Suite 400
Toronto, ON M5H 1T1

Diane Winters

Tel: (647) 256-7459

Email: diane.winters@justice.gc.ca

AND TO: OLYMPIA TRUST COMPANY

200, 125-9 Avenue SE
Calgary, AB T2G 0P6

Jonathan Bahnuik

Tel: (403) 668-8365
Email: BahnuikJ@olympiatruster.com

Johnny Luong

Tel: (403) 668-8349
Email: LuongJ@olympiatruster.com

Jennifer Marquez

Tel: (403) 776-8699
Email: MarquezJ@olympiatruster.com

AND TO: CHAD PAULI

Email: whatsupdoc6000@gmail.com

AND TO: SOLOWAY WRIGHT LLP

700 – 427 Laurier Avenue West
Ottawa, ON K1R 7Y2

Ryan D. Garrett

Tel: (613) 236-0111
Fax: (613) 238-8507
Email: garretr@solowaywright.com

Lawyers for J. L. Richards & Associates Limited

AND TO: VINER, KENNEDY, FREDERICK, ALLAN & TOBIAS LLP

366 King Street East, Suite 300
Kingston, ON K7K 6Y3

Garth B. Allan

Tel: (613) 542-7867
Fax: (613) 542-1279
Email: gallan@vinerkennedy.com

Lawyers for Computershare Trust Company of Canada

AND TO: HARRISON PENZA LLP
450 Talbot Street, P.O. Box 3237
London, ON N6A 4K3

Ian C. Wallace
Tel: (519) 679-9660
Fax: (519) 667-3362
Email: iwallace@harrisonpensa.com

Lawyers for 2377358 Ontario Limited and Creek Crest Holdings Inc.

AND TO: BORDEN LADNER GERVAIS LLP
22 Adelaide Street West
Bay Adelaide Centre, East Tower
Toronto, ON M5H 4E3

James MacLellan
Tel: (416) 367-6592
Fax: (416) 361-7350
Email: jmaclellan@blg.com

Lawyers for Trisura Guarantee Insurance Company

AND TO: CHAITONS LLP
5000 Yonge Street, 10th Floor
Toronto, ON M2N 7E9

Harvey Chaiton
Tel: (416) 218-1129
Fax: (416) 218-1849
Email: harvey@chaitons.com

George Benchetrit
Tel: (416) 218-1141
Fax: (416) 218-1849
Email: george@chaitons.com

Lawyers for the Investors Committee

AND TO: DLA PIPER CANADA LLP
1 First Canadian Place
100 King Street West, Suite 6000
Toronto, ON M5X 1E2

Howard D. Krupat
Tel: (416) 365-3510
Fax: (416) 777-7421
Email: howard.krupat@dlapiper.com

Lawyers for Leeswood Design Build Ltd.

AND TO: GOLDMAN, SLOAN, NASH & HABER LLP
480 University Avenue, Suite 1600
Toronto, ON M5G 1V2

Paul Hancock
Tel: (416) 597-9922
Fax: (416) 597-3370
Email: hancock@gsnh.com

Lawyers for Limen Group Const. Ltd.

AND TO: MARCIANO BECKENSTEIN LLP
Barristers & Solicitors
7625 Keele Street
Concord, Ontario L4K 1Y4

Shael E. Beckenstein
Tel: (905) 760-8773
Fax: (905) 669-7416
Email: sbeckenstein@mblaw.ca

Lawyers for Sarah Kranc personally and as Estate Trustee for the Estate of Harry Kranc

AND TO: VAUGHAN CROSSINGS INC.
7501 Keele Street
Suite 401
Vaughan, Ontario L4K 1Y2

AND TO: VINCENT ALBERT GUIDO
4 Magic Avenue
Markham, Ontario L4C 0A5

AND TO: ANTHONY DEGUSTOFARO
64 Carmen Crescent
Woodbridge, Ontario L4L 5P5

AND TO: BATTISTON & ASSOCIATES
Barristers and Solicitors
1013 Wilson Avenue
Suite 202
Toronto, Ontario M3K 1G1

Flavio Battiston (22965F)
Tel: (416) 630-7151
Fax: (416) 630-7472
Email: f.battiston@battistonlaw.com

Lawyers for lien claimant, Triaxis Construction Limited

AND TO: BLANEY McMURTRY LLP
1500-2 Queen Street East
Toronto, ON M5C 3G5

Steven P. Jeffery
Tel: (416) 593-3939
Fax: (416) 594-2966
Email: sjeffery@blaney.com

Lawyers for Downing Street Financial Inc.

AND TO: BREAKWALL FINANCIAL CORPORATION
3200 Lakeshore Road
Burlington, ON L7N 1A4

Dennis Jewitt
Email: dennis@breakwall.com

AND TO: 2569880 ONTARIO LIMITED
3200 Lakeshore Road
Burlington, ON L7N 1A4

Dennis Jewitt
Email: dennis@breakwall.com

AND TO: VARCON CONSTRUCTION CORPORATION
c/o Scalisi Barristers
8800 Dufferin Street, Suite 103
Concord, ON L4K 0C5

Vito S. Scalisi
Tel: (905) 760-5588 ext. 226
Email: vito@scalisilaw.ca

AND TO: HLD CORPORATION LTD.
50 Howland Drive, Unit 4
Huntsville, ON P1H 2P9

AND TO: WILLIAMS SCOTSMAN OF CANADA INC.
13932 Woodbine Ave.
P.O. Box 89
Gormley, ON L0H 1G0

AND TO: HARRISON PENZA LLP
450 Talbot Street
P.O. Box 3237
London, ON N6A 4K3

Tim Hogan
Tel: (519) 661-6743
Fax: (519) 667-3362
Email: thogan@harrisonpensa.com

Lawyers for Versa Bank

AND TO: DUNNET LAW PROFESSIONAL CORPORATION
648 Shenandoah Dr.
Mississauga, ON L5H 1V9

David Dunnet
Tel: (905) 990-1902
Fax: (905) 990-2072
Email: david.dunnet@dunnetlaw.com

Lawyers for the Failed McMurray Transaction Purchaser

AND TO: 1884871 ONTARIO LIMITED
Box 149
Ripley, ON N0G 2R0

Attn: Rob Thompson, President
Email: royaloakcreek@gmail.com

AND TO: ROB THOMPSON
Box 149
Ripley, ON N0G 2R0

Email: royaloakcreek@gmail.com

AND TO: 1875443 ONTARIO LIMITED

71837 Sunridge Cres., R.R. 1
Dashwood, ON N0M 1N0

Attention: Gary Connolly

AND TO: LIUHUAN SHAN

Email: serenashan@icloud.com

AND TO: DAVE I'ANSON

Email: dave.ianson063@sympatico.ca

AND TO: JERZY MICHNIEWICZ

Email: george.michniewicz@yahoo.ca

AND TO: KATARZYNA MICHNIEWICZ

Email: kmichniewicz66@gmail.com

AND TO: R Q PARTNERS LLP

BDC Building
3901 Highway #7, Suite 400
Vaughan, ON L4L 8L5

Domenic Rotundo

Tel: (905) 264-7800

Fax: (905) 264-7808

Email: Drotundo@rqpartners.ca

Lawyers for Silver Seven Corporate Centre Inc.

AND TO: LAX O'SULLIVAN LISUS GOTTLIEB LLP

Suite 2750, 145 King Street West
Toronto, ON M5H 1J8

Matthew Gottlieb

Tel: (416) 644-5353

Fax: (416) 598-3730

Email: mgottlieb@lolg.ca

Andrew Winton

Tel: (416) 598-1744

Fax: (416) 598-3730

Email: awinton@lolg.ca

Lawyers for KingSett Mortgage Corporation

AND TO: MNP LTD.
148 Fullarton Street, Suite 1002
London, ON N6A 5P3

Rob Smith
Tel: (519) 964-2212
Fax: (519) 964-2210
Email: rob.smith@mnp.ca

Ross Park Receiver

AND TO: LOOPSTRA NIXON LLP
135 Queens Plate Drive
Etobicoke, ON M9W 6V1

R. Graham Phoenix
Tel: (416) 748-4776
Email: gphoenix@loonix.com

Lawyers for the Ross Park Receiver

AND TO: RISE REAL ESTATE INC.
611 Tradewind Drive, Suite 300
Ancaster, ON L9G 4V5

Brian McMullan
Email: brianm@riserealestate.ca

AND TO: FOGLER, RUBINOFF LLP
77 King Street West, Suite 3000
TD Centre, North Tower
Toronto, ON M5K 1G8

Alan J. Frank
Email: afrank@foglers.com

Lawyers for the Ross Park Purchaser

AND TO: ONTARIO MUNICIPAL BOARD
Environment and Land Tribunals Ontario

Tamara Zwarycz
Tel: (416) 212-6349
Fax: (416) 326-5370
Email: tamara.zwarycz@ontario.ca

Hodan Egeh
Tel: (416) 326-6790
Fax: (416) 326-5370
Email: hodan.egeh@ontario.ca

AND TO: CITY OF LONDON

C. Saunder
Email: csaunder@london.ca

Aynsley Anderson
Email: aanderson@london.ca

AND TO: UPPER THAMES RIVER CONSERVATION AUTHORITY
c/o A. Ferreira, Ferreira Law
Email: analee@ferreiralaw.ca

AND TO: SUSAN BENTLEY AND ALEX ROSTAS
c/o S. Trosow
Email: strosow@uwo.ca

AND TO: TORYS LLP
79 Wellington Street West
33rd Floor
Toronto, ON M5K 1N2

Adam Slavens
Tel: (416) 865-7333
Fax: (416) 865-7380
Email: aslavens@torys.com

Lawyers for Tarion Warranty Corporation

AND TO: CHAITONS LLP
5000 Yonge Street, 10th Floor
Toronto, ON M2N 7E9

Robert A. Miller
Tel: (416) 218-1134
Fax: (416) 218-1834
Email: robert@chaitons.com

Escrow Agent

**AND TO: LEVINE SHERKIN BOUSSIDAN
PROFESSIONAL CORPORATION**
23 Lesmill Road, Suite 300
Toronto, ON M3B 3P6

Kevin Sherkin
Tel: (416) 224-2400 ext. 120
Fax: (416) 224-2408
Email: kevin@lsblaw.com

Eric Sherkin
Tel: (416) 224-2400 ext. 101
Fax: (416) 224-2408
Email: eric@lsblaw.com

*Lawyers for Karen Spitzer, Jay Spitzer, Bianca Marcus, Ari Eisen, Michael
Cadotte and Paul Bennett*

**AND TO: DAMODAR SHARMA
c/o Shivan Micoo**
Shivan Micoo Professional Corporation
202-8920 Woodbine Avenue
Markham, ON L3R 9W9

Tel: (905) 752-1446 ext. 120
Fax: (905) 752-1453
Email: smprofessionalcorp@gmail.com

AND TO: PRESVELOS LAW
300 - 55 Adelaide Street East
Toronto, ON M5C 1K6

Sam A. Presvelos
Tel: (416) 844-3457
Email: spresvelos@presveloslaw.com

Lawyers for Sanda Weiler, Muhammad Saeed, Gina Marques, Fernando Marques, Darrell Flint, Susan Barron, Gerrardo Deluca, Maria Deluca, Patt Caravaggio and Ninetta Caravaggio

AND TO: ANTHONY DEL ZOTTO
19-1591 Southparade Court
Mississauga, ON
L5M 6G1
Email: anzdelzotto@rogers.com

AND TO: KYUNG HEE KIM
201-586 Yonge St.
Toronto, ON
M4Y 1Z3
Email: kyungheene@hotmail.com

AND TO: WAI LIN NG WONG
213-1205 Vanrose Street
Mississauga, ON
L5V 1W8
Email: tpwwong@yahoo.com

AND TO: TERESA LAI AND BERNADETTE LEUNG
53 Oakmoor Lane
Markham, ON L6B 0P1
Email: teresalai@live.com

AND TO: DOMENIC CARAVAGGIO
c/o Patrizio Caravaggio
48 Katie Court
North York, ON M6L 1R6
Email: pcaravaggio@gmail.com

AND TO: JOSEPH MARIGNANI
14880 Jane Street
King City, ON L7B 1A3
Email: renojoe2015@gmail.com

AND TO: ARTHUR SHLANGER
80 McCallum Drive, Unit 17
Richmond Hill, ON L4C 9X5
Email: shlangeraccountingservices@bellnet.ca

AND TO: JING ZHI LI (JANE LI)
2126 – 15 Northtown Way
North York, ON M2N 7A2
Email: janeli8763@yahoo.com

**AND TO: CYNTHIA KAR-KAY LI, BEN LI
AND REBECCA LI**
31 Horner Court
Richmond Hill, ON L4B 3G6

Attention: Rebecca Li
Email: rebeccawcli@gmail.com

AND TO: SINGLETON URQUHART REYNOLDS VOGEL LLP
150 King Street West, Suite 2512
P.O. Box 24
Toronto, ON M5H 1J9

Peter Wardle
Tel: (416) 585-8604
Fax: (416) 585-9458
Email: pwardle@singleton.com

Evan Rankin
Tel: (416) 585-8615
Fax: (416) 585-9458
Email: erankin@singleton.com

*Lawyers for Harris + Harris LLP, and Gregory Harris, in his personal capacity
and in his capacity as Trustee of the Davies Family Trust*

AND TO: MILLER THOMSON LLP
40 King Street West, Suite 5800
P.O. Box 1011
Toronto, ON M5H 3S1

James Zibarras
Tel: (416) 595-2998
Fax: (416) 595-8695
Email: jzibarras@millerthomson.com

Adam Stephens
Tel: (416) 595-8572
Fax: (416) 595-8695
Email: astephens@millerthomson.com

Lawyers for Walter Thompson and 13281805 Ontario Inc.

AND TO: BRESVER GROSSMAN CHAPMAN & HABAS LLP
Barristers & Solicitors
2900 – 390 Bay Street
Toronto, ON M5H 2Y2

Andrea M. Habas
Tel: (416) 869-0366
Fax: (416) 869-0321
Email: ahabas@bgchlaw.com

Lawyers for Bruce Stewart and The Traditions Development Company Ltd.

AND TO: WILSON VUKELICH LLP
Barristers and Solicitors
60 Columbia Way, Suite 710
Markham, ON L3R 0C9

Christopher A.L. Caruana
Tel: (905) 944-2952 ext. 2395
Fax: (905) 940-8785
Email: ccaruana@wvllp.ca

Lawyers for David Arsenault

AND TO: MEMORY CARE INVESTMENTS LTD.
51 Caldari Road, Suite #A1M
Concord, ON L4K 4G3

-and-

24 Country Club Drive
King City, ON L7B 1M5

AND TO: STIEBER BERLACH LLP
130 Adelaide St. W., 18th Floor
Toronto, ON M5H 3P5

Murray Stieber
Tel: (416) 594-4675
Fax: (416) 366-1466
Email: mstieber@sblegal.ca

Chris Afonso
Tel: (416) 594-4691
Fax: (416) 366-1466
Email: cafonso@sblegal.ca

Lawyers for Michael Cane

AND TO: ROBERTO CUCCI
99 Edith Drive
Toronto, ON M4R 1Z3

Fax: (416) 485-0533
Email: cuccislaw@gmail.com

Lawyer for Jude Cassimy and First Commonwealth Mortgage Corporation

EMAIL LIST

mark.bailey@fsc.gov.on.ca; troy.harrison@fsc.gov.on.ca; sylvia.vymyslicky@fsrao.ca;
sgraff@airdberlis.com; iaversa@airdberlis.com; jnemers@airdberlis.com;
mspence@airdberlis.com; jonathan.krieger@ca.gt.com; bkofman@ksvadvisory.com;
ngoldstein@ksvadvisory.com; zweigs@bennettjones.com; bellj@bennettjones.com;
blinickj@bennettjones.com; fosterj@bennettjones.com; dchristie@rubinchristie.ca;
edmond.lamek@dlapiper.com; danny.nunes@dlapiper.com; [johndavies55@rogers.com](mailto: johndavies55@rogers.com);
Judydavies67@rogers.com; diane.winters@justice.gc.ca; [BahnuikJ@olympiustrust.com](mailto: BahnuikJ@olympiustrust.com);
Luongj@olympiustrust.com; [MarquezJ@olympiustrust.com](mailto: MarquezJ@olympiustrust.com); whatsupdoc6000@gmail.com;
garretr@solowaywright.com; gallan@vinerkennedy.com; iwallace@harrisonpensa.com;
jmaclellan@blg.com; harvey@chaitons.com; george@chaitons.com;
howard.krupat@dlapiper.com; hancock@gsnh.com; sbeckenstein@mblaw.ca;
f.battiston@battistonlaw.com; sjeffery@blaney.com; dennis@breakwall.com;
vito@scalisilaw.ca; thogan@harrisonpensa.com; david.dunnet@dunnetlaw.com;
royaloakcreek@gmail.com; serenashan@icloud.com; dave.ianson063@sympatico.ca;
george.michniewicz@yahoo.ca; kmichniewicz66@gmail.com; Drotundo@rqpartners.ca;
mgotlieb@lolg.ca; awinton@lolg.ca; rob.smith@mnp.ca; gphoenix@loonix.com;
brianm@riserealestate.ca; afrank@foglers.com; tamara.zwarycz@ontario.ca;
hodan.egeh@ontario.ca; csaunder@london.ca; aanderson@london.ca; analee@ferreiralaw.ca;
strosow@uwo.ca; aslavens@torys.com; robert@chaitons.com; kevin@lsblaw.com;
eric@lsblaw.com; smprofessionalcorp@gmail.com; spresvelos@presveloslaw.com;
anzdelzotto@rogers.com; kyungheene@hotmail.com; tpwwong@yahoo.com;
teresalai@live.com; pcaravaggio@gmail.com; renojoe2015@gmail.com;
shlangeraccountingservices@bellnet.ca; janeli8763@yahoo.com; rebeccawcli@gmail.com;
pwardle@singleton.com; erankin@singleton.com; jzibarras@millerthomson.com;
astephens@millerthomson.com; ahabas@bgchlaw.com; ccaruana@wvllp.ca;
mstieber@sblegal.ca; cafonso@sblegal.ca; cuccislaw@gmail.com

SERVICE LIST
CV-17-589078-00CL
(Current as of April 12, 2023)

TO: GRANT THORNTON LIMITED
19th Floor, Royal Bank Plaza
South Tower, 200 Bay Street
Toronto, ON M5J 2P9

Jonathan Krieger
Tel: (416) 360-5055
Email: jonathan.krieger@ca.gt.com

Court-appointed Trustee

AND TO: AIRD & BERLIS LLP
Barristers and Solicitors
Brookfield Place
Suite 1800, 181 Bay Street
Toronto, ON M5J 2T9

Steven L. Graff
Tel: (416) 865-7726
Fax: (416) 863-1515
Email: sgraff@airdberlis.com

Ian Aversa
Tel: (416) 865-3082
Fax: (416) 863-1515
Email: iaversa@airdberlis.com

Jeremy Nemers
Tel: (416) 865-7724
Fax: (416) 863-1515
Email: jnemers@airdberlis.com

Miranda Spence
Tel: (416) 865-3414
Fax: (416) 863-1515
Email: mspence@airdberlis.com

Lawyers for the Court-appointed Trustee

AND TO: KSV RESTRUCTURING INC.
220 Bay Street, 13th Floor
P.O. Box 20
Toronto, ON M5J 2W4

Bobby Kofman
Tel: (416) 932-6228
Fax: (416) 932-6266
Email: bkofman@ksvadvisory.com

Noah Goldstein
Tel: (416) 932-6207
Fax: (416) 932-6266
Email: ngoldstein@ksvadvisory.com

The Court-appointed Receiver

AND TO: BENNETT JONES LLP
3400 One First Canadian Place, P.O. Box 130
Toronto, ON M5X 1A4

Sean Zweig
Tel: (416) 777-6254
Fax: (416) 863-1716
Email: zweigs@bennettjones.com

Jonathan Bell
Tel: (416) 777-6511
Fax: (416) 863-1716
Email: bellj@bennettjones.com

Joseph Blinick
Tel: (416) 777-4828
Fax: (416) 863-1716
Email: blinickj@bennettjones.com

Joshua Foster
Tel: (416) 777-7906
Fax: (416) 863-1716
Email: fosterj@bennettjones.com

Lawyers for the Court-appointed Receiver

AND TO: LAX O'SULLIVAN LISUS GOTTLIEB LLP
Suite 2750, 145 King Street West
Toronto, ON M5H 1J8

Matthew Gottlieb
Tel: (416) 644-5353
Fax: (416) 598-3730
Email: mgottlieb@lolg.ca

Andrew Winton
Tel: (416) 598-1744
Fax: (416) 598-3730
Email: awinton@lolg.ca

Lawyers for the Applicant, KingSett Mortgage Corporation

AND TO: RUBIN & CHRISTIE LLP
Lawyers
2nd Floor, 219 Finch Avenue West
Toronto, ON M2R 1M2

Douglas Christie
Tel: (416) 361-0900
Fax: (416) 361-3459
Email: dchristie@rubinchristie.ca

Lawyers for Textbook Student Suites (445 Princess Street) Inc.

AND TO: DLA PIPER (CANADA) LLP
1 First Canadian Place, Suite 6000
100 King Street West
Toronto, ON M5X 1E2

Edmond Lamek
Tel: (416) 365-3444
Fax: (416) 365-7886
Email: edmond.lamek@dlapiper.com

Danny Nunes
Tel: (416) 365-3421
Fax: (416) 365-7886
Email: danny.nunes@dlapiper.com

Lawyers for Textbook Student Suites (445 Princess Street) Inc.

AND TO: FOGLER, RUBINOFF LLP
77 King Street West, Suite 3000
TD Centre, North Tower
Toronto, ON M5K 1G8

Avi Sugar
Tel: (416) 365-3717
Email: asugar@foglers.com

Lawyers for the Proposed Purchaser

AND TO: CHAITONS LLP
5000 Yonge Street, 10th Floor
Toronto, ON M2N 7E9

Harvey Chaiton
Tel: (416) 218-1129
Fax: (416) 218-1849
Email: harvey@chaitons.com

George Benchetrit
Tel: (416) 218-1141
Fax: (416) 218-1849
Email: george@chaitons.com

Lawyers for the Investors Committee

AND TO: JOHN DAVIES
Email: johndavies55@rogers.com

AND TO: MILLER THOMSON LLP
40 King Street West, Suite 5800
P.O. Box 1011
Toronto, ON M5H 3S1

James Zibarras
Tel: (416) 595-2998
Fax: (416) 595-8695
Email: jzibarras@millertomson.com

Adam Stephens
Tel: (416) 595-8572
Fax: (416) 595-8695
Email: astephens@millertomson.com

Lawyers for Walter Thompson and 13281805 Ontario Inc.

**AND TO: TEXTBOOK STUDENT SUITES (445 PRINCESS STREET) TRUSTEE
CORPORATION**
2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

EMAIL LIST

sgraff@airdberlis.com; iaversa@airdberlis.com; jnemers@airdberlis.com;
mspence@airdberlis.com; jonathan.krieger@ca.gt.com; bkofman@ksvadvisory.com;
ngoldstein@ksvadvisory.com; zweigs@bennettjones.com; bellj@bennettjones.com;
blinickj@bennettjones.com; fosterj@bennettjones.com; mgottlieb@lolg.ca; awinton@lolg.ca;
dchristie@rubinchristie.ca; edmond.lamek@dlapiper.com; danny.nunes@dlapiper.com;
asugar@foglers.com; harvey@chaitons.com; george@chaitons.com; johndavies55@rogers.com;
jzibarras@millerthomson.com; astephens@millerthomson.com;

SERVICE LIST
CV-17-11689-00CL
(Updated as of April 12, 2023)

TO: THE SUPERINTENDENT OF FINANCIAL SERVICES
25 Sheppard Avenue West, Suite 100
Toronto, ON
M2N 6S6

Tel: (416) 590-7143

Fax: (416) 590-7556

Mark Bailey

Email: mark.bailey@fscs.gov.on.ca

Troy Harrison

Email: troy.harrison@fscs.gov.on.ca

Sylvia (Vymyslicky) Ezeard

Email: sylvia.vymyslicky@fscs.gov.on.ca

Lawyers for the Applicant, The Superintendent of Financial Services

AND TO: GRANT THORNTON LIMITED
19th Floor, Royal Bank Plaza
South Tower, 200 Bay Street
Toronto, ON M5J 2P9

Jonathan Krieger

Tel: (416) 360-5055

Email: jonathan.krieger@ca.gt.com

Court-appointed Trustee

AND TO: AIRD & BERLIS LLP
Barristers and Solicitors
Brookfield Place
Suite 1800, 181 Bay Street
Toronto, ON M5J 2T9

Steven L. Graff
Tel: (416) 865-7726
Fax: (416) 863-1515
Email: sgraff@airdberlis.com

Ian Aversa
Tel: (416) 865-3082
Fax: (416) 863-1515
Email: iaversa@airdberlis.com

Jeremy Nemers
Tel: (416) 865-7724
Fax: (416) 863-1515
Email: jnemers@airdberlis.com

Miranda Spence
Tel: (416) 865-3414
Fax: (416) 863-1515
Email: mspence@airdberlis.com

Lawyers for the Court-appointed Trustee

AND TO: KSV RESTRUCTURING INC.
220 Bay Street, 13th Floor
P.O. Box 20
Toronto, ON M5J 2W4

Bobby Kofman
Tel: (416) 932-6228
Fax: (416) 932-6266
Email: bkofman@ksvadvisory.com

Noah Goldstein
Tel: (416) 932-6207
Fax: (416) 932-6266
Email: ngoldstein@ksvadvisory.com

The Court-appointed Receiver

AND TO: BENNETT JONES LLP
3400 One First Canadian Place, P.O. Box 130
Toronto, ON M5X 1A4

Sean Zweig

Tel: (416) 777-6254
Fax: (416) 863-1716
Email: zweigs@bennettjones.com

Jonathan Bell

Tel: (416) 777-6511
Fax: (416) 863-1716
Email: bellj@bennettjones.com

Joseph Blinick

Tel: (416) 777-4828
Fax: (416) 863-1716
Email: blinickj@bennettjones.com

Joshua Foster

Tel: (416) 777-7906
Fax: (416) 863-1716
Email: fosterj@bennettjones.com

Lawyers for the Court-appointed Receiver

AND TO: DLA PIPER (CANADA) LLP
1 First Canadian Place, Suite 6000
100 King Street West
Toronto, ON M5X 1E2

Edmond Lamek
Tel: (416) 365-3444
Fax: (416) 365-7886
Email: edmond.lamek@dlapiper.com

Danny Nunes
Tel: (416) 365-3421
Fax: (416) 365-7886
Email: danny.nunes@dlapiper.com

Lawyers for Textbook Student Suites (525 Princess Street) Inc., Textbook Student Suites (555 Princess Street) Inc., Textbook Student Suites (Ross Park) Inc., Textbook Student Suites (774 Bronson Avenue) Inc., Textbook Student Suites (445 Princess Street) Inc., Memory Care Investments (Oakville) Ltd., Memory Care Investments (Burlington) Ltd., Memory Care Investments (Kitchener) Ltd., Legacy Lane Investments Inc. and Scollard Development Corporation

AND TO: MINDEN GROSS LLP
145 King Street West, Suite 2200
Toronto, ON M5H 4G2

Kenneth L. Kallish
Tel: (416) 369-4124
Email: kkallish@mindengross.com

Catherine Francis
Tel: 416-369-4137
Email: cfrancis@mindengross.com

Lawyers for the Respondent, 2174217 Ontario Inc.

AND TO: DEPARTMENT OF JUSTICE
120 Adelaide Street West, Suite 400
Toronto, ON M5H 1T1

Diane Winters
Tel: (647) 256-7459
Email: diane.winters@justice.gc.ca

AND TO: SINGLETON URQUHART REYNOLDS VOGEL LLP
150 King Street West, Suite 2512
P.O. Box 24
Toronto, ON M5H 1J9

Peter Wardle
Tel: (416) 585-8604
Fax: (416) 585-9458
Email: pwardle@singleton.com

Evan Rankin
Tel: (416) 585-8615
Fax: (416) 585-9458
Email: erankin@singleton.com

Lawyers for Harris + Harris LLP
AND TO: PAPE BARRISTERS PROFESSIONAL CORPORATION
1 Queen Street East, Suite 1910
Toronto, ON M5C 2W5

David Steinberg
Tel: (416) 364-8798
Email: dss@papebarristers.com

Lawyers for Spring Hill Investments Inc.

AND TO: HARRISON PENZA LLP
450 Talbot Street, P.O. Box 3237
London, ON N6A 4K3

Ian C. Wallace
Tel: (519) 679-9660
Fax: (519) 667-3362
Email: iwallace@harrisonpensa.com

Lawyers for 2377358 Ontario Limited and Creek Crest Holdings Inc.

AND TO: GARFINKLE BIDERMAN LLP
1 Adelaide Street East, Suite 801
Toronto, ON M5C 2V9

Wendy Greenspoon-Soer
Tel: (416) 869-7615
Email: wgreenspoon@garfinkle.com

Lawyers for Vector Financial Services Limited

AND TO: BORDEN LADNER GERVAIS LLP
22 Adelaide Street West
Bay Adelaide Centre, East Tower
Toronto, ON M5H 4E3

James MacLellan
Tel: (416) 367-6592
Fax: (416) 361-7350
Email: jmaclellan@blg.com

Lawyers for Trisura Guarantee Insurance Company

AND TO: CHAITONS LLP
5000 Yonge Street, 10th Floor
Toronto, ON M2N 7E9

Harvey Chaiton
Tel: (416) 218-1129
Fax: (416) 218-1849
Email: harvey@chaitons.com

George Benchetrit
Tel: (416) 218-1141
Fax: (416) 218-1849
Email: george@chaitons.com

Lawyers for the Investors Committee

AND TO: MCLAUHLIN & ASSOCIATES
155 University Avenue, Suite 200
Toronto, ON M5H 3B7

William Andrew McLauchlin
Tel: (416) 368-2555
Email: wamcl@mclauchlin.ca

Megan Wells Sandford
Tel: (416) 368-2526
Email: msanford@mclauchlin.ca

Lawyers for IBI Group Architects (Canada) Inc., IBI Group Professional Services (Canada) Inc. and Young + Wright/IBI Group Architects

AND TO: DLA PIPER CANADA LLP
1 First Canadian Place
100 King Street West, Suite 6000
Toronto, ON M5X 1E2

Howard D. Krupat
Tel: (416) 365-3510
Fax: (416) 777-7421
Email: howard.krupat@dlapiper.com

Lawyers for Leeswood Design Build Ltd.

AND TO: GOLDMAN, SLOAN, NASH & HABER LLP
480 University Avenue, Suite 1600
Toronto, ON M5G 1V2

Paul Hancock
Tel: (416) 597-9922
Fax: (416) 597-3370
Email: hancock@gsnh.com

Lawyers for Limen Group Const. Ltd.

AND TO: BLANEY McMURTRY LLP
1500 2 Queen Street East
Toronto, ON MSC 305

David Ullmann
Tel: (416) 593-4289
Email: dullmann@blaney.com

Alexandra Teodoreseu
Tel: (416) 596-4279
Email: ateodorescu@blaney.com

Lawyers for KingSett Mortgage Corporation

AND TO: OLYMPIA TRUST COMPANY
200, 125-9 Avenue SE
Calgary, AB T2G 0P6

Jonathan Bahnuik
Tel: (403) 668-8365
Email: BahnuikJ@olympiatrust.com

Johnny Luong
Tel: (403) 668-8349
Email: LuongJ@olympiatrust.com

Jennifer Marquez
Tel: (403) 776-8699
Email: MarquezJ@olympiatrust.com

AND TO: VINER, KENNEDY, FREDERICK, ALLAN & TOBIAS LLP
366 King Street East, Suite 300
Kingston, ON K7K 6Y3

Garth B. Allan
Tel: (613) 542-7867
Fax: (613) 542-1279
Email: gallan@vinerkennedy.com

Lawyers for Computershare Trust Company of Canada

AND TO: GHD Limited
86 Rankin Street
Waterloo, Ontario
N2V 1V9

Bill Deley
Tel: (519) 884-7780 ext. 4680
Email: bill.deley@ghd.com

Creditor

AND TO: ROSE PERSIKO RAKOWSKY MELVIN LLP
390 Bay Street
Suite 600
Toronto, Ontario M5H 2Y2

Ronald B. Melvin
Tel: 416-868-1908
Email: rbmelvin@rprlaw.com

Lawyers for Vector Financial Services Limited

AND TO: MARCIANO BECKENSTEIN LLP
Barristers & Solicitors
7625 Keele Street
Concord, Ontario L4K 1Y4

Shael E. Beckenstein
Tel: (905) 760-8773
Fax: (905) 669-7416
Email: sbeckenstein@mblaw.ca

Lawyers for Sarah Kranc personally and as Estate Trustee for the Estate of Harry Kranc

AND TO: BATTISTON & ASSOCIATES
Barristers and Solicitors
1013 Wilson Avenue
Suite 202
Toronto, Ontario M3K 1G1

Flavio Battiston (22965F)
Tel: (416) 630-7151
Fax: (416) 630-7472
Email: f.battiston@battistonlaw.com

Lawyers for lien claimant, Triaxis Construction Limited

AND TO: BLANEY McMURTRY LLP
1500-2 Queen Street East
Toronto, ON M5C 3G5

Steven P. Jeffery
Tel: (416) 593-3939
Fax: (416) 594-2966
Email: sjeffery@blaney.com

Lawyers for Downing Street Financial Inc.

AND TO: BREAKWALL FINANCIAL CORPORATION
3200 Lakeshore Road
Burlington, ON L7N 1A4

Dennis Jewitt
Email: dennis@breakwall.com

AND TO: 2569880 ONTARIO LIMITED
3200 Lakeshore Road
Burlington, ON L7N 1A4

Dennis Jewitt
Email: dennis@breakwall.com

AND TO: 2514778 ONTARIO INC.
c/o 3415 American Drive
Suite 200
Mississauga, Ontario L4V 1T4

Domenic Enda
Tel: (416) 613-1345

Email: clomluda@trixaxis.net

AND TO: VARCON CONSTRUCTION CORPORATION
c/o Scalisi Barristers
8800 Dufferin Street, Suite 103
Concord, ON L4K 0C5

Vito S. Scalisi
Tel: (905) 760-5588 ext. 226
Email: vito@scalisilaw.ca

AND TO: JOHN DAVIES
Email: johndavies55@rogers.com

AND TO: CHAD PAULI
Email: whatsupdoc6000@gmail.com

AND TO: MILLER THOMSON LLP
40 King Street West, Suite 5800
P.O. Box 1011
Toronto, ON M5H 3S1

James Zibarras
Tel: (416) 595-2998
Fax: (416) 595-8695
Email: jzibarras@millერთhompson.com

Adam Stephens
Tel: (416) 595-8572
Fax: (416) 595-8695
Email: astephens@millერთhompson.com

Lawyers for Walter Thompson and 13281805 Ontario Inc.

AND TO: 2223947 ONTARIO LIMITED
7 Bowan Court
Toronto, ON M2K 3A8

AND TO: 7743718 CANADA INC.
2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: TEXTBOOK STUDENT SUITES (525 PRINCESS STREET) TRUSTEE CORPORATION
2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: TEXTBOOK STUDENT SUITES (555 PRINCESS STREET) TRUSTEE CORPORATION
2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: TEXTBOOK STUDENT SUITES (ROSS PARK) TRUSTEE CORPORATION
2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: TEXTBOOK STUDENT SUITES (774 BRONSON AVENUE) TRUSTEE CORPORATION
2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: TEXTBOOK STUDENT SUITES (445 PRINCESS STREET) TRUSTEE CORPORATION
2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: TEXTBOOK SUITES INC.
2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: TEXTBOOK STUDENT SUITES INC.
2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: ROBERTO CUCCI
99 Edith Drive
Toronto, ON M4R 1Z3

Fax: (416) 485-0533
Email: cuccislaw@gmail.com

Lawyer for Jude Cassimy and First Commonwealth Mortgage Corporation

AND TO: HAZELTON 4070 DIXIE ROAD TRUSTEE CORPORATION
2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: KEELE MEDICAL TRUSTEE CORPORATION
2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: DAVE BALKISSOON
604 Four Winds Way
Mississauga, ON L5R 3M4

AND TO: VINCENT ALBERT GUIDO
4 Magic Avenue
Markham, Ontario L4C 0A5

AND TO: ANTHONY DEGUSTOFARO
64 Carmen Crescent
Woodbridge, Ontario L4L 5P5

AND TO: HLD CORPORATION LTD.
50 Howland Drive, Unit 4
Huntsville, ON P1H 2P9

AND TO: MC TRUSTEE (KITCHENER) LTD.
2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: SCOLLARD TRUSTEE CORPORATION
2355 Skymark Avenue, Suite 300
Mississauga, ON L4W 4Y6

AND TO: MEMORY CARE INVESTMENTS LTD.
51 Caldari Road, Suite #A1M
Concord, ON L4K 4G3

-and-

24 Country Club Drive
King City, ON L7B 1M5

EMAIL LIST

mark.bailey@fsco.gov.on.ca; troy.harrison@fsco.gov.on.ca; sylvia.vymyslicky@fsrao.ca;
jonathan.krieger@ca.gt.com; sgraff@airdberlis.com; iaversa@airdberlis.com;
jnemers@airdberlis.com; mspence@airdberlis.com; bkofman@ksvadvisory.com;
ngoldstein@ksvadvisory.com; zweigs@bennettjones.com; bellj@bennettjones.com;
blinickj@bennettjones.com; fosterj@bennettjones.com; edmond.lamek@dlapiper.com;
danny.nunes@dlapiper.com; kkallish@mindengross.com; cfrancis@mindengross.com;
diane.winters@justice.gc.ca; pwardle@singleton.com; erankin@singleton.com;
dss@papebarristers.com; iwallace@harrisonpensa.com; wgreenspoon@garfinkle.com;
jmaclellan@blg.com; harvey@chaitons.com; george@chaitons.com; wamcl@mclauchlin.ca;
msanford@mclauchlin.ca; howard.krupat@dlapiper.com; hancock@gsnh.com;
dullmann@blaney.com; ateodorescu@blaney.com; BahnuikJ@olympiatrust.com;
LuongJ@olympiatrust.com; MarquezJ@olympiatrust.com; gallan@vinerkennedy.com;
bill.deley@ghd.com; rvmelvin@rprlaw.com; sbeckenstein@mblaw.ca;
f.battiston@battistonlaw.com; sjeffery@blaney.com; dennis@breakwall.com;
clomluda@trixaxis.net; vito@scalisilaw.ca; johndavies55@rogers.com;
whatsupdoc6000@gmail.com; jzibarras@millerthomson.com; astephens@millerthomson.com;
cuccislaw@gmail.com

SERVICE LIST
CV-18-606314-00CL
(Current as of April 12, 2023)

TO: **AIRD & BERLIS LLP**
Barristers and Solicitors
Brookfield Place
Suite 1800, 181 Bay Street
Toronto, ON M5J 2T9

Steven L. Graff
Tel: (416) 865-7726
Fax: (416) 863-1515
Email: sgraff@airdberlis.com

Ian Aversa
Tel: (416) 865-3082
Fax: (416) 863-1515
Email: iaversa@airdberlis.com

Jeremy Nemers
Tel: (416) 865-7724
Fax: (416) 863-1515
Email: jnemers@airdberlis.com

Miranda Spence
Tel: (416) 865-3414
Fax: (416) 863-1515
Email: mspence@airdberlis.com

*Lawyers for the plaintiff, Grant Thornton Limited, in its capacity as court-appointed
Trustee of the Trustee Corporations*

AND TO: BENNETT JONES LLP
3400 One First Canadian Place, P.O. Box 130
Toronto, ON M5X 1A4

Sean Zweig
Tel: (416) 777-6254
Fax: (416) 863-1716
Email: zweigs@bennettjones.com

Jonathan Bell
Tel: (416) 777-6511
Fax: (416) 863-1716
Email: bellj@bennettjones.com

Joseph Blinick
Tel: (416) 777-4828
Fax: (416) 863-1716
Email: blinickj@bennettjones.com

Joshua Foster
Tel: (416) 777-7906
Fax: (416) 863-1716
Email: fosterj@bennettjones.com

Lawyers for the plaintiff, KSV Restructuring Inc., in its capacity as the Court-appointed Receiver of the Receivership Companies

AND TO: JOHN DAVIES
Email: johndavies55@rogers.com

John Davies in his personal capacity, in his capacity as representative of Aeolian Investments Ltd., and as Trustee of both The Davies Arizona Trust and The Davies Family Trust

AND TO: JUDITH DAVIES
Email: Judydavies67@rogers.com

Judith Davies in her personal capacity and in her capacity as Trustee of The Davies Family Trust

AND TO: MILLER THOMSON LLP
40 King Street West, Suite 5800
P.O. Box 1011
Toronto, ON M5H 3S1

James Zibarras
Tel: (416) 595-2998
Fax: (416) 595-8695
Email: jzibarras@millერთhompson.com

Adam Stephens
Tel: (416) 595-8572
Fax: (416) 595-8695
Email: astephens@millერთhompson.com

Lawyers for the defendants, Walter Thompson and 13281805 Ontario Inc.

AND TO: SINGLETON URQUHART REYNOLDS VOGEL LLP
150 King Street West, Suite 2512
P.O. Box 24
Toronto, ON M5H 1J9

Peter Wardle
Tel: (416) 585-8604
Fax: (416) 585-9458
Email: pwardle@singleton.com

Evan Rankin
Tel: (416) 585-8615
Fax: (416) 585-9458
Email: erankin@singleton.com

Lawyers for the defendants, Gregory Harris and Harris + Harris LLP

AND TO: BRESVER GROSSMAN CHAPMAN & HABAS LLP

Barristers & Solicitors
2900 – 390 Bay Street
Toronto, ON M5H 2Y2

Andrea M. Habas

Tel: (416) 869-0366
Fax: (416) 869-0321
Email: ahabas@bgchlaw.com

Lawyers for the defendants, Bruce Stewart and The Traditions Development Company Ltd.

AND TO: WILSON VUKELICH LLP

Barristers and Solicitors
60 Columbia Way, Suite 710
Markham, ON L3R 0C9

Christopher A.L. Caruana

Tel: (905) 944-2952 ext. 2395
Fax: (905) 940-8785
Email: ccaruana@wvllp.ca

Lawyers for the defendant, David Arsenault

AND TO: STIEBER BERLACH LLP

130 Adelaide St. W., 18th Floor
Toronto, ON M5H 3P5

Murray Stieber

Tel: (416) 594-4675
Fax: (416) 366-1466
Email: mstieber@sblegal.ca

Chris Afonso

Tel: (416) 594-4691
Fax: (416) 366-1466
Email: cafonso@sblegal.ca

Lawyers for the defendant, Michael Cane

AND TO: ROBERTO CUCCI
99 Edith Drive
Toronto, ON M4R 1Z3

Fax: (416) 485-0533
Email: cuccislaw@gmail.com

Lawyer for the defendants, Jude Cassimy and First Commonwealth Mortgage Corporation

EMAIL LIST

sgraff@airdberlis.com; iaversa@airdberlis.com; jnemers@airdberlis.com; mspence@airdberlis.com;
zweigs@bennettjones.com; bellj@bennettjones.com; blinickj@bennettjones.com;
fosterj@bennettjones.com; Johndavies55@rogers.com; Judydavies67@rogers.com;
jzibarras@millerthomson.com; astephens@millerthomson.com; pwardle@singleton.com;
erankin@singleton.com; ahabas@bgchlaw.com; ccaruana@wvllp.ca; mstieber@sblegal.ca;
cafonso@sblegal.ca; cuccislaw@gmail.com;

INDEX

TAB	DESCRIPTION
VOLUME 1 OF 3	
1	Notice of Motion
2	Twenty-Second Report of the Receiver Dated April 12, 2023
A	Receivership Orders
B	Corporate Charts
C	Third Amended Statement of Claim
D	Arsenault Settlement Agreement dated February 7, 2022
E	Cane Settlement Agreement dated January 17, 2023
F	Thompson Settlement Agreement dated March 31, 2023
VOLUME 2 OF 3	
G	Fee Affidavit of Noah Goldstein sworn April 12, 2023
VOLUME 3 OF 3	
H	Fee Affidavit of Sean Zweig sworn April 10, 2023
3	Order (Fee and Activity Approval)

TAB G

Appendix “G”

COURT FILE NO.: CV-16-11567-00CL
COURT FILE NO: CV-17-11689-00CL
COURT FILE NO: CV-17-589078-00CL
COURT FILE NO.: CV-16-11822-00CL
COURT FILE NO.: CV-18-606314-00CL

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

IN THE MATTER OF THE RECEIVERSHIP OF SCOLLARD DEVELOPMENT CORPORATION, MEMORY CARE INVESTMENTS (KITCHENER) LTD., MEMORY CARE INVESTMENTS (OAKVILLE) LTD., 1703858 ONTARIO INC., LEGACY LANE INVESTMENTS LTD., TEXTBOOK (525 PRINCESS STREET) INC. AND TEXTBOOK (555 PRINCESS STREET) INC.

AND IN THE MATTER OF THE RECEIVERSHIP OF TEXTBOOK (445 PRINCESS STREET) INC.

AND IN THE MATTER OF THE RECEIVERSHIP OF TEXTBOOK ROSS PARK INC., TEXTBOOK (774 BRONSON AVENUE) INC. AND MCMURRAY STREET INVESTMENTS INC.

AS RECEIVER AND MANAGER OF CERTAIN PROPERTY OF SCOLLARD DEVELOPMENT CORPORATION, MEMORY CARE INVESTMENTS (KITCHENER) LTD., MEMORY CARE INVESTMENTS (OAKVILLE) LTD., 1703858 ONTARIO INC., LEGACY LANE INVESTMENTS LTD., TEXTBOOK (525 PRINCESS STREET) INC. AND TEXTBOOK (555 PRINCESS STREET) INC.

AND

AS RECEIVER AND MANAGER OF CERTAIN PROPERTY OF TEXTBOOK (445 PRINCESS STREET) INC.

AND

OF TEXTBOOK ROSS PARK INC., TEXTBOOK (774 BRONSON AVENUE) INC. AND MCMURRAY STREET INVESTMENTS INC.

**AFFIDAVIT OF NOAH GOLDSTEIN
(Sworn April 12, 2023)**

I, Noah Goldstein, of the City of Toronto, in the Province of Ontario, MAKE OATH AND
SAY:

1. I am a Vice President of KSV Restructuring Inc. ("KSV").¹
2. Pursuant to orders (the "Receivership Order") of the Ontario Superior Court of Justice (Commercial List) (the "Court") made on January 27, 2017, April 28, 2018, January 3, 2018 and May 30, 2018, KSV was appointed as the receiver of certain assets of Scollard Development Corporation ("Scollard"), Memory Care Investments (Kitchener) Ltd. ("Kitchener"), Memory Care Investments (Oakville) Ltd. ("Oakville"), 1703858 Ontario Inc. ("Burlington"), Legacy Lane Investments Ltd. ("Legacy Lane"), Textbook (525 Princess Street) Inc. ("525 Princess"), Textbook (555 Princess Street) Inc. ("555 Princess"), Textbook (445 Princess Street) Inc. ("445 Princess"), Textbook (774 Bronson Avenue) Inc. ("Bronson"), Textbook Ross Park Inc. ("Ross Park") and McMurray Street Investments Inc. ("McMurray") (collectively, the "Receivership Companies").
3. I have been extensively involved in all aspects of this mandate since the date of the Receivership Order. As such, I have knowledge of the matters to which I hereinafter depose.
4. On April 12, 2023, the Receiver finalized its Report to Court in which it provided a summary of the Receiver's fees and those of its legal counsel.
5. The Receiver has allocated the fees to a specific project when its activities relate to a specific project. However, a significant portion of the activities performed by the Receiver are of a general nature, and are not specifically allocable to a project, including time related to the investigation of the Receivership Companies and the resulting litigation. The Receiver has allocated such time evenly across the relevant Receivership Companies.
6. I hereby confirm that attached as Exhibit "A" hereto are true copies of the accounts of KSV for the periods indicated and confirm that these accounts accurately reflect the services provided by KSV in this matter and the fees and disbursements claimed by them.

¹ Effective August 31, 2020, KSV Kofman Inc. changed its name to KSV Restructuring Inc.

7. Additionally, attached hereto as Exhibit "B" is a summary of roles, hours and rates charged by members of KSV who have worked on this matter, and I hereby confirm that the list represents an accurate account of such information.

8. I consider the accounts to be fair and reasonable considering the circumstances connected with this matter.

9. I also confirm that the Receiver has not received, nor expects to receive, nor has the Receiver been promised any remuneration or consideration other than the amounts claimed in the accounts.

SWORN BEFORE ME at the City of)
Toronto, in the Province of Ontario, this)
12th day of April, 2023.)



_____)
Catherine Anne Stuyck-Therault, a Commissioner, etc.,)
Province of Ontario for KSV Advisory Inc. and)
KSV Restructuring Inc.)
Expires February 19, 2025)



_____)
NOAH GOLDSTEIN

THIS IS EXHIBIT "A" REFERRED TO IN THE
AFFIDAVIT OF NOAH GOLDSTEIN
SWORN BEFORE ME THIS 12th DAY OF APRIL, 2023

A handwritten signature in blue ink, appearing to read 'Catherine', is written above a horizontal line.

Catherine Anne Stuyck-Therault, a Commissioner, etc.,
Province of Ontario for KSV Advisory Inc. and
KSV Restructuring Inc.
Expires February 19, 2025



INVOICE

Scollard Development Corporation
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

June 29, 2021

Invoice No: 2235

HST #: 818808768RT0001

Re: Scollard Development Corporation (the “Company”)

For professional services rendered for the period April 1, 2021 to May 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on April 7, 16, 20, 21, 22, 29 and 30, 2021 and May 3, 4, 5, 13, 17, 26, 28 and 31, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Corresponding with Bennett Jones regarding a settlement with Nancy Elliott and Elliott Law Professional Corporation and reviewing settlement documentation and correspondence regarding same (the “Elliott Settlement”);
- Preparing the Receiver’s Twenty First Report to Court dated May 5, 2021 in order to approve, *inter alia*, the Elliott Settlement;
- Attending at Court on May 13, 2021 in connection with the Elliott Settlement;
- Considering an offer to settle from a defendant and discussing same with Bennett Jones;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 4,045.50
HST	525.92
Total	\$ <u>4,571.42</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Scollard Development Corporation

Time Summary

For the period from April 1, 2021 to May 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.40	1,050.00
Noah Goldstein	650	2.71	1,761.50
Other Staff and Administration		4.06	1,234.00
Total Fees			<u>4,045.50</u>



INVOICE

Scollard Development Corporation
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

August 18, 2021

Invoice No: 2288

HST #: 818808768RT0001

Re: Scollard Development Corporation (the "Company")

For professional services rendered for the period June 1, 2021 to July 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on June 1, 2, 4, 5, 8, 9, 14, 16, 19, 23, 28, 29 and 30, 2021, and July 2, 3, 7, 16, 18, 19, 20, 24, 25, 26 and 28, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Attending on June 16 and 17, 2021 the discovery of Bruce Stewart;
- Attending on June 21, 2021 the discovery of David Arsenault;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Reviewing [REDACTED] and discussing same with Bennett Jones;
- Attending on July 26, 2021 the examination of John Davies;
- Preparing for an examination of the Receiver to be conducted in August 2021;
- Preparing summaries of the Stewart, Arsenault and Davies examinations;
- Preparing the Company's monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	4,324.25
HST		<u>562.15</u>
Total	\$	<u>4,886.40</u>

KSV Restructuring Inc.
Scollard Development Corporation
Time Summary
For the period June 1, 2021 to July 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	3.075	2,306.25
Noah Goldstein	650	1.500	975.00
Other Staff and Administration		3.480	1,043.00
Total Fees			<u>4,324.25</u>



INVOICE

Scollard Development Corporation
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

September 20, 2021

Invoice No: 2331

HST #: 818808768RT0001

Re: Scollard Development Corporation (the “Company”)

For professional services rendered during August 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on August 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 16, 17, 18, 20, 25 and 27, 2021;
- Attending on August 16, 2021 at the discovery of Jonathan Krieger of Grant Thornton LLP;
- Attending on August 26, 2021 at the discovery of Gregory Harris;
- Preparing for the examination of the Receiver (Robert Kofman) to be conducted on August 19, 2021, including:
 - attending a half-day call with Bennett Jones on August 12, 2021
 - creating an index of documents relevant to the examination;
 - reviewing all Court reports issued by the Receiver;
 - reviewing transcripts from the examinations of certain defendants previously conducted, including Jon Davies, Bruce Stewart and David Arsenault;
 - reviewing historical email correspondence drafted by various of the defendants in the context of Mr. Kofman’s examination preparation;
 - preparing various analyses for use by Mr. Kofman at his examination; and
 - corresponding internally;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Attending at the cross-examination of Mr. Kofman on August 19, 2021;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Settling litigation against David Arsenault, a defendant, and corresponding with Bennett Jones regarding same;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	7,518.75
HST		<u>977.44</u>
Total	\$	<u>8,496.19</u>

KSV Restructuring Inc.
Scollard Development Corporation
Time Summary
For the month ending August 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	7.325	5,493.75
Noah Goldstein	650	2.550	1,657.50
Other Staff and Administration		1.400	367.50
Total Fees			<u>7,518.75</u>



INVOICE

Scollard Development Corporation
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

December 15, 2021

Invoice No: 2439

HST #: 818808768RT0001

Re: Scollard Development Corporation (the "Company")

For professional services rendered from September 1, 2021 to November 30, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on September 1, 3, 6, 10, 12, 13, 14, 15 and 29, 2021, October 1, 15, 16, 17, 21 and 31, 2021 and November 1, 15, 17, 20 and 23, 2021;
- Corresponding with Bennett Jones regarding the examination of Walter Thompson;
- Settling litigation against David Arsenault, a defendant, and corresponding with Bennett Jones regarding same;
- Reviewing quarterly income reporting for John and Judith Davies and corresponding with Bennett Jones regarding same;
- Reviewing a [REDACTED] and considering same with Bennett Jones;
- Reviewing a [REDACTED] prepared by Bennett Jones;
- Attending a call on November 15, 2021 with Bennett Jones to discuss next steps in the litigation;
- Preparing the interim report of the Receiver (the "Interim Report") as required under Section 246 of the *Bankruptcy and Insolvency Act*;
- Preparing a schedule of receipts and disbursements in connection with the Interim Report;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	2,268.78
HST		<u>294.94</u>
Total	\$	<u><u>2,563.72</u></u>

KSV Restructuring Inc.
Scollard Development Corporation

Time Summary

For the period September 1, 2021 to November 30, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.50	1,125.00
Noah Goldstein	650	1.28	832.00
Other Staff and Administration		0.60	307.00
Subtotal			<u>2,264.00</u>
Out of pocket disbursements			4.78
Total Fees and Disbursements			<u><u>2,268.78</u></u>



INVOICE

Scollard Development Corporation
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

January 14, 2022

Invoice No: 2480
 HST #: 818808768RT0001

Re: Scollard Development Corporation (the "Company")

For professional services rendered during December 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on December 9, 10, 13, 15, 20 and 22, 2021;
- Reviewing various letters prepared by Bennett Jones dated December 15, 2021 to various defendants in the litigation;
- Corresponding with Bennett Jones regarding a voicemail on December 21, 2021 from counsel to Mr. Thompson;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	571.00
HST		74.23
Total	\$	<u>645.23</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Scollard Development Corporation
Time Summary
For the month ending December 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	0.25	187.50
Noah Goldstein	650	0.36	234.00
Other Staff and Administration		0.83	149.50
Subtotal			<u>571.00</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>571.00</u></u>



INVOICE

Scollard Development Corporation
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

February 15, 2022

Invoice No: 2517

HST #: 818808768RT0001

Re: Scollard Development Corporation (the “Company”)

For professional services rendered during January 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on January 7, 10, 18, 19, 20 and 25, 2022;
- Reviewing John Davies’ quarterly income reporting received on January 4, 2022;
- Attending a call on January 17, 2022 with TYR LLP, counsel to Raj Singh, regarding Mr. Singh’s settlement and corresponding with Bennett Jones regarding same;
- Reviewing a letter from Peter Wardle, counsel to Greg Harris, dated January 18, 2022 regarding insurance coverage available for Mr. Harris, etc.;
- Reviewing a letter from Miller Thompson LLP, counsel to Walter Thompson dated January 19, 2022 regarding insurance coverage available for Mr. Thompson, etc.;
- Reviewing a letter from Bresver Grossman Chapman & Habas LLP, counsel to Bruce Stewart, dated January 25, 2022 regarding insurance coverage available for Mr. Stewart;
- Reviewing a schedule of insurance coverage available for each Defendant in the litigation;
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,668.40
HST		<u>216.89</u>
Total	\$	<u>1,885.29</u>

Scollard Development Corporation
Time Summary
For the month ending January 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.27	984.25
Noah Goldstein	675	0.77	519.75
Other Staff and Administration		0.89	164.40
Subtotal			<u>1,668.40</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,668.40</u></u>

Effective January 1, 2022, the hourly rates of Messrs. Kofman and Goldstein increased by \$25.



INVOICE

Scollard Development Corporation
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

March 18, 2022

Invoice No: 2551
HST #: 818808768RT0001

Re: Scollard Development Corporation (the “Company”)

For professional services rendered during February 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - attending a long call on February 2nd concerning litigation strategy;
 - reviewing and commenting on February 4th on [REDACTED];
 - reviewing on February 4th [REDACTED];
 - reviewing and commenting on February 15th [REDACTED];
 - reviewing and commenting on a [REDACTED];
- Reviewing support from John Davies for quarterly income reporting;
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release of funds held in trust;
- Reviewing a chart [REDACTED];
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,071.48
HST		<u>139.29</u>
Total	\$	<u>1,210.77</u>

KSV Restructuring Inc.
Scollard Development Corporation
Time Summary
For the month ending February 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.975	755.63
Noah Goldstein	675	0.270	182.25
Other Staff and Administration		0.760	133.60
Subtotal			<u>1,071.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,071.48</u></u>



INVOICE

Scollard Development Corporation
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

April 19, 2022

Invoice No: 2597

HST #: 818808768RT0001

Re: Scollard Development Corporation (the “Company”)

For professional services rendered during March 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - drafting and reviewing emails concerning the litigation, including on March 3, 24, 25, 28 29 and 30, 2022;
 - reviewing and commenting on [REDACTED];
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release to KSV of funds it held as security for certain of the Company’s obligations;
- Attending on March 28, 2022 a call with Grant Thornton LLP (“GT”), the Court appointed Trustee of Tier 1 Investments, to discuss the status of the litigation;
- Attending on March 30, 2022 a call with GT and Chaitons LLP, representative counsel to the investors, to discuss the status of the litigation;
- Considering with [REDACTED];
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,043.00
HST		135.59
Total	\$	<u>1,178.59</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Scollard Development Corporation
Time Summary
For the month ending March 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.80	620.00
Noah Goldstein	675	0.36	243.00
Other Staff and Administration		0.99	180.00
Subtotal			<u>1,043.00</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,043.00</u></u>



INVOICE

Scollard Development Corporation
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

May 24, 2022

Invoice No: 2643
HST #: 818808768RT0001

Re: Scollard Development Corporation (the “Company”)

For professional services rendered during April 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - attending a call on April 1st concerning litigation strategy;
 - several emails on April 6th regarding [REDACTED];
 - reviewing several iterations of a [REDACTED]
- Reviewing support information from John Davies and his wife in respect of their quarterly income reporting obligations;
- Attending a call on April 19th with Bennett Jones, Aird & Berlis LLP and Grant Thornton to discuss the litigation strategy;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,218.45
HST		<u>158.40</u>
Total	\$	<u><u>1,376.85</u></u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Scollard Development Corporation
Time Summary
For the month ending April 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.650	503.75
Noah Goldstein	675	0.820	553.50
Other Staff and Administration		0.920	161.20
Subtotal			<u>1,218.45</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,218.45</u></u>



INVOICE

Scollard Development Corporation
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

July 18, 2022

Invoice No: 2710

HST #: 818808768RT0001

Re: Scollard Development Corporation (the “Company”)

For professional services rendered from May 1, 2022 to June 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- reviewing and finalizing [REDACTED];
- reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including on June 13, 14, 15 and 29, 2022; and
 - drafting responses, including preparing several schedules;
- reviewing a [REDACTED] and considering same with Bennett Jones, including on June 16, 2022;
- preparing the Company’s monthly HST return; and
- to all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 2,368.30
HST	<u>307.88</u>
Total	<u>\$ 2,676.18</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Scollard Development Corporation
Time Summary
For the period May 1, 2022 to June 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.19	922.25
Noah Goldstein	675	1.54	1,039.50
Other Staff and Administration		2.08	406.55
Subtotal			<u>2,368.30</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>2,368.30</u></u>



INVOICE

Scollard Development Corporation
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

December 22, 2022

Invoice No: 2890
 HST #: 818808768RT0001

Re: Scollard Development Corporation (the "Company")

For professional services rendered from July 1, 2022 to November 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver;
 - drafting responses throughout the period, including preparing several schedules;
- Reviewing John Davies' quarterly income reporting received on July 4, 2022 and corresponding with Bennett Jones re same;
- Considering [REDACTED]
- Reviewing and commenting on [REDACTED]
- Discussing the status of litigation against the remaining defendants and dealing with Bennett Jones to arrange a meeting with Grant Thornton in this regard;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 3,402.48
HST	442.32
Total	\$ <u>3,844.80</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Scollard Development Corporation

Time Summary

For the Period from July 1, 2022 to November 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.375	1,065.63
Noah Goldstein	675	3.030	2,045.25
Other Staff and Administration		1.660	291.60
Subtotal			<u>3,402.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>3,402.48</u></u>



INVOICE

Scollard Development Corporation
 c/o KSV Restructuring Inc.
 220 Bay St, Suite 1300
 Toronto ON M5J 2W4

February 10, 2023

Invoice No: 2948

HST #: 818808768RT0001

Re: Scollard Development Corporation (the "Company")

For professional services rendered from December 1, 2022 to January 31, 2023 by KSV Restructuring Inc., in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- drafting [REDACTED] including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver; and
 - preparing schedules supporting the [REDACTED]
- reviewing John Davies' quarterly income reporting received on July 4, 2022;
- discussing [REDACTED] with Bennett Jones;
- discussing [REDACTED] with Bennett Jones;
- attending a meeting on January 17, 2023 with Aird & Berlis LLP, Grant Thornton LLP and Bennett Jones regarding the status of litigation in these proceedings, and next steps;
- preparing the Company's monthly HST return; and
- to all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 4,412.00
HST	573.56
Total	\$ <u>4,985.56</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Scollard Development Corporation

Time Summary

For the Period from December 1, 2022 to January 31, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775-800	2.00	1,587.50
Noah Goldstein	675-700	2.61	1,784.25
Other Staff and Administration		3.27	1,040.25
Subtotal			<u>4,412.00</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>4,412.00</u></u>



INVOICE

Scollard Development Corporation
c/o KSV Restructuring Inc.
220 Bay St, Suite 1300
Toronto ON M5J 2W4

March 17, 2023

Invoice No: 3035

HST #: 818808768RT0001

Re: Scollard Development Corporation (the "Company")

For professional services rendered during February 28, 2023 in our capacity as Receiver and Manager of the Companies (the "Receiver"), including: ¹

- attending calls with Bennett Jones LLP, counsel to the Receiver, including on February 2, 2023;
- continuing to work with Bennet Jones and Aird & Berlis LLP, counsel to Grant Thornton Limited, Court-appointed Trustee in the "Textbook" proceedings;
- advancing settlement discussions with Walter Thompson, David Arsenault and Michael Cane;
- preparing Statements of Receipts and Disbursements;
- attending various internal meetings regarding the settlements;
- dealing with various administrative matters, including HST returns; and
- dealing with all other matters not specifically referenced above.

Total fees and disbursements per attached summary	\$	1,419.50
HST		<u>184.54</u>
Total	\$	<u><u>1,604.04</u></u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Scollard Development Corporation
Time Summary
For the Period Ending February 28, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	800	1.15	920.00
Noah Goldstein	700	0.36	252.00
Other Staff and Administration		0.92	247.50
Subtotal			<u>1,419.50</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,419.50</u></u>



INVOICE

Memory Care Investments (Kitchener) Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto, ON M5H 1J9

June 29, 2021

Invoice No: 2241

HST #: 818808768RT0001

Re: Memory Care Investments (Kitchener) Ltd. (the “Company”)

For professional services rendered for the period April 1, 2021 to May 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on April 7, 16, 20, 21, 22, 29 and 30, 2021 and May 3, 4, 5, 13, 17, 26, 28 and 31, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Corresponding with Bennett Jones regarding a settlement with Nancy Elliott and Elliott Law Professional Corporation and reviewing settlement documentation and correspondence regarding same (the “Elliott Settlement”);
- Preparing the Receiver’s Twenty First Report to Court dated May 5, 2021 in order to approve, *inter alia*, the Elliott Settlement;
- Attending at Court on May 13, 2021 in connection with the Elliott Settlement;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 3,718.00
HST	483.34
Total	\$ <u>4,201.34</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Memory Care Investments (Kitchener) Ltd.

Time Summary

For the period from April 1, 2021 to May 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.40	1,050.00
Noah Goldstein	650	2.71	1,761.50
Other Staff and Administration		2.96	906.50
Total Fees			<u>3,718.00</u>



INVOICE

Memory Care Investments (Kitchener) Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto, ON M5H 1J9

August 18, 2021

Invoice No: 2294
 HST #: 818808768RT0001

Re: Memory Care Investments (Kitchener) Ltd. (the “Company”)

For professional services rendered for the period June 1, 2021 to July 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on June 1, 2, 4, 5, 8, 9, 14, 16, 19, 23, 28, 29 and 30, 2021, and July 2, 3, 7, 16, 18, 19, 20, 24, 25, 26 and 28, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Attending on June 16 and 17, 2021 the discovery of Bruce Stewart;
- Attending on June 21, 2021 the discovery of David Arsenault;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Reviewing [REDACTED] and discussing same with Bennett Jones;
- Attending on July 26, 2021 the examination of John Davies;
- Preparing for an examination of the Receiver to be conducted in August 2021;
- Preparing summaries of the Stewart, Arsenault and Davies examinations;
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	4,290.25
HST		<u>557.73</u>
Total	\$	<u>4,847.98</u>

KSV Restructuring Inc.
Memory Care Investments (Kitchener) Ltd.

Time Summary

For the period from June 1, 2021 to July 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	3.075	2,306.25
Noah Goldstein	650	1.500	975.00
Other Staff and Administration		3.310	1,009.00
Total Fees			<u>4,290.25</u>



INVOICE

Memory Care Investments (Kitchener) Ltd.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto, ON M5H 1J9

September 20, 2021

Invoice No: 2337
HST #: 818808768RT0001

Re: Memory Care Investments (Kitchener) Ltd. (the “Company”)

For professional services rendered during August 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on August 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 16, 17, 18, 20, 25 and 27, 2021;
- Attending on August 16, 2021 at the discovery of Jonathan Krieger of Grant Thornton LLP;
- Attending on August 26, 2021 at the discovery of Gregory Harris;
- Preparing for the examination of the Receiver (Robert Kofman) to be conducted on August 19, 2021, including:
 - attending a half-day call with Bennett Jones on August 12, 2021
 - creating an index of documents relevant to the examination;
 - reviewing all Court reports issued by the Receiver;
 - reviewing transcripts from the examinations of certain defendants previously conducted, including Jon Davies, Bruce Stewart and David Arsenaault;
 - reviewing historical email correspondence drafted by various of the defendants in the context of Mr. Kofman’s examination preparation;
 - preparing various analyses for use by Mr. Kofman at his examination; and
 - corresponding internally;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Attending at the cross-examination of Mr. Kofman on August 19, 2021;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Settling litigation against David Arsenault, a defendant, and corresponding with Bennett Jones regarding same;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	7,518.75
HST		<u>977.44</u>
Total	\$	<u>8,496.19</u>

KSV Restructuring Inc.
Memory Care Investments (Kitchener) Ltd.

Time Summary

For the month ending August 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	7.325	5,493.75
Noah Goldstein	650	2.550	1,657.50
Other Staff and Administration		1.400	367.50
Total Fees			<u>7,518.75</u>



INVOICE

Memory Care Investments (Kitchener) Ltd.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto, ON M5H 1J9

December 15, 2021

Invoice No: 2445
HST #: 818808768RT0001

Re: Memory Care Investments (Kitchener) Ltd. (the “Company”)

For professional services rendered from September 1, 2021 to November 30, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on September 1, 3, 6, 10, 12, 13, 14, 15 and 29, 2021, October 1, 15, 16, 17, 21 and 31, 2021 and November 1, 15, 17, 20 and 23, 2021;
- Corresponding with Bennett Jones regarding the examination of Walter Thompson;
- Settling litigation against David Arseneault, a defendant, and corresponding with Bennett Jones regarding same;
- Reviewing quarterly income reporting for John and Judith Davies and corresponding with Bennett Jones regarding same;
- Reviewing a [REDACTED] and considering same with Bennett Jones;
- Reviewing [REDACTED] prepared by Bennett Jones;
- Attending a call on November 15, 2021 with Bennett Jones to discuss next steps in the litigation;
- Preparing the interim report of the Receiver (the “Interim Report”) as required under Section 246 of the *Bankruptcy and Insolvency Act*;
- Preparing a schedule of receipts and disbursements in connection with the Interim Report;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	2,606.29
HST		<u>338.82</u>
Total	\$	<u><u>2,945.11</u></u>

KSV Restructuring Inc.
Memory Care Investments (Kitchener) Ltd.

Time Summary

For the period September 1, 2021 to November 30, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.50	1,125.00
Noah Goldstein	650	1.28	832.00
Other Staff and Administration		4.08	644.50
Subtotal			<u>2,601.50</u>
Out of pocket disbursements			4.79
Total Fees			<u><u>2,606.29</u></u>



INVOICE

Memory Care Investments (Kitchener) Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto, ON M5H 1J9

January 14, 2022

Invoice No: 2486
 HST #: 818808768RT0001

Re: Memory Care Investments (Kitchener) Ltd. (the “Company”)

For professional services rendered during December 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on December 9, 10, 13, 15, 20 and 22, 2021;
- Reviewing various letters prepared by Bennett Jones dated December 15, 2021 to various defendants in the litigation;
- Corresponding with Bennett Jones regarding a voicemail on December 21, 2021 from counsel to Mr. Thompson;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 571.00
HST	74.23
Total	\$ <u>645.23</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Memory Care Investments (Kitchener) Ltd.

Time Summary

For the month ending December 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	0.25	187.50
Noah Goldstein	650	0.36	234.00
Other Staff and Administration		0.83	149.50
Subtotal			571.00
Out of pocket disbursements			-
Total Fees and Disbursements			571.00



INVOICE

Memory Care Investments (Kitchener) Ltd.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto, ON M5H 1J9

February 15, 2022

Invoice No: 2523
HST #: 818808768RT0001

Re: Memory Care Investments (Kitchener) Ltd. (the “Company”)

For professional services rendered during January 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on January 7, 10, 18, 19, 20 and 25, 2022;
- Reviewing John Davies’ quarterly income reporting received on January 4, 2022;
- Attending a call on January 17, 2022 with TYR LLP, counsel to Raj Singh, regarding Mr. Singh’s settlement and corresponding with Bennett Jones regarding same;
- Reviewing a letter from Peter Wardle, counsel to Greg Harris, dated January 18, 2022 regarding insurance coverage available for Mr. Harris, etc.;
- Reviewing a letter from Miller Thompson LLP, counsel to Walter Thompson dated January 19, 2022 regarding insurance coverage available for Mr. Thompson, etc.;
- Reviewing a letter from Bresver Grossman Chapman & Habas LLP, counsel to Bruce Stewart, dated January 25, 2022 regarding insurance coverage available for Mr. Stewart;
- Reviewing a schedule of insurance coverage available for each Defendant in the litigation;
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,668.40
HST		<u>216.89</u>
Total	\$	<u>1,885.29</u>

KSV Restructuring Inc.
Memory Care Investments (Kitchener) Ltd.

Time Summary
For the month ending January 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.27	984.25
Noah Goldstein	675	0.77	519.75
Other Staff and Administration		0.89	164.40
Subtotal			<u>1,668.40</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,668.40</u></u>

Effective January 1, 2022, the hourly rates of Messrs. Kofman and Goldstein increased by \$25.



INVOICE

Memory Care Investments (Kitchener) Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto, ON M5H 1J9

March 18, 2022

Invoice No: 2557
 HST #: 818808768RT0001

Re: Memory Care Investments (Kitchener) Ltd. (the “Company”)

For professional services rendered during February 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - attending a long call on February 2nd concerning litigation strategy;
 - reviewing and commenting on February 4th on [REDACTED];
 - reviewing on February 4th [REDACTED];
 - reviewing and commenting on February 15th on [REDACTED];
 - reviewing and commenting on [REDACTED];
- Reviewing support from John Davies for quarterly income reporting;
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release of funds held in trust;
- Reviewing a chart [REDACTED];
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,071.48
HST		<u>139.29</u>
Total	\$	<u>1,210.77</u>

KSV Restructuring Inc.
Memory Care Investments (Kitchener) Ltd.

Time Summary

For the month ending February 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.975	755.63
Noah Goldstein	675	0.270	182.25
Other Staff and Administration		0.760	133.60
Subtotal			<u>1,071.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,071.48</u></u>



INVOICE

Memory Care Investments (Kitchener) Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

April 19, 2022

Invoice No: 2603
 HST #: 818808768RT0001

Re: Memory Care Investments (Kitchener) Ltd. (the “Company”)

For professional services rendered during March 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - drafting and reviewing emails concerning the litigation, including on March 3, 24, 25, 28 29 and 30, 2022;
 - reviewing and commenting on [REDACTED]
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release to KSV of funds it held as security for certain of the Company’s obligations;
- Attending on March 28, 2022 a call with Grant Thornton LLP (“GT”), the Court appointed Trustee of Tier 1 Investments, to discuss the status of the litigation;
- Attending on March 30, 2022 a call with GT and Chaitons LLP, representative counsel to the investors, to discuss the status of the litigation;
- Considering with [REDACTED]
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,043.00
HST		135.59
Total	\$	<u>1,178.59</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Memory Care Investments (Kitchener) Ltd.

Time Summary

For the month ending March 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.80	620.00
Noah Goldstein	675	0.36	243.00
Other Staff and Administration		0.99	180.00
Subtotal			<u>1,043.00</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,043.00</u></u>

**INVOICE**

Memory Care Investments (Kitchener) Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

May 24, 2022

Invoice No: 2649
 HST #: 818808768RT0001

Re: Memory Care Investments (Kitchener) Ltd. (the "Company")

For professional services rendered during April 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including:
 - attending a call on April 1st concerning litigation strategy;
 - several emails on April 6th regarding [REDACTED];
 - reviewing several iterations of a [REDACTED]
- Reviewing support information from John Davies and his wife in respect of their quarterly income reporting obligations;
- Attending a call on April 19th with Bennett Jones, Aird & Berlis LLP and Grant Thornton to discuss the litigation strategy;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 1,218.45
HST	158.40
Total	<u>\$ 1,376.85</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Memory Care Investments (Kitchener) Ltd.

Time Summary
For the month ending April 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.65	503.75
Noah Goldstein	675	0.82	553.50
Other Staff and Administration		0.92	161.20
Subtotal			<u>1,218.45</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,218.45</u></u>

**kvs advisory inc.**

150 King Street West, Suite 2308

Toronto, Ontario, M5H 1J9

T +1 416 932 6262

F +1 416 932 6266

www.ksvadvisory.com

INVOICE

Memory Care Investments (Kitchener) Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

July 18, 2022

Invoice No: 2716
 HST #: 818808768RT0001

Re: Memory Care Investments (Kitchener) Ltd. (the "Company")

For professional services rendered from May 1, 2022 to June 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- reviewing and finalizing [REDACTED];
- reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including on June 13, 14, 15 and 29, 2022; and
 - drafting responses, including preparing several schedules;
- reviewing a [REDACTED] and considering same with Bennett Jones, including on June 16, 2022;
- preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 2,360.80
HST	306.90
Total	<u>\$ 2,667.70</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Memory Care Investments (Kitchener) Ltd.

Time Summary

For the period May 1, 2022 to June 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.19	922.25
Noah Goldstein	675	1.54	1,039.50
Other Staff and Administration		2.08	399.05
Subtotal			<u>2,360.80</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>2,360.80</u></u>

**ksv advisory inc.**

150 King Street West, Suite 2308

Toronto, Ontario, M5H 1J9

T +1 416 932 6262

F +1 416 932 6266

www.ksvadvisory.com

INVOICE

Memory Care Investments (Kitchener) Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

December 22, 2022

Invoice No: 2896
 HST #: 818808768RT0001

Re: Memory Care Investments (Kitchener) Ltd. (the "Company")

For professional services rendered from July 1, 2022 to November 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Reviewing the [REDACTED] including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver;
 - drafting responses throughout the period, including preparing several schedules;
- Reviewing John Davies' quarterly income reporting received on July 4, 2022 and corresponding with Bennett Jones re same;
- Considering [REDACTED]
- Reviewing and commenting on draft [REDACTED]
- Discussing the status of litigation against the remaining defendants and dealing with Bennett Jones to arrange a meeting with Grant Thornton in this regard;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 3,357.68
HST	436.50
Total	\$ <u>3,794.18</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Memory Care Investments (Kitchener) Ltd.

Time Summary

For the period July 1, 2022 to November 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.375	1,065.63
Noah Goldstein	675	3.030	2,045.25
Other Staff and Administration		1.380	246.80
Subtotal			<u>3,357.68</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>3,357.68</u></u>

**INVOICE**

Memory Care Investments (Kitchener) Ltd.
 c/o KSV Restructuring Inc.
 220 Bay St, Suite 1300
 Toronto ON M5J 2W4

February 10, 2023

Invoice No: 2954
 HST #: 818808768RT0001

Re: Memory Care Investments (Kitchener) Ltd. (the "Company")

For professional services rendered from December 1, 2022 to January 31, 2023 by KSV Restructuring Inc., in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- drafting [REDACTED] including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver; and
 - preparing schedules supporting the [REDACTED]
- reviewing John Davies' quarterly income reporting received on July 4, 2022;
- discussing [REDACTED] with Bennett Jones;
- discussing [REDACTED] with Bennett Jones;
- attending a meeting on January 17, 2023 with Aird & Berlis LLP, Grant Thornton LLP and Bennett Jones regarding the status of litigation in these proceedings, and next steps;
- preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 4,485.75
HST	583.15
Total	\$ <u>5,068.90</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

Memory Care Investments (Kitchener) Ltd.

Time Summary

For the Period from December 1, 2022 to January 31, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775-800	2.000	1,587.50
Noah Goldstein	675-700	2.620	1,791.00
Other Staff and Administration		3.520	1,107.25
Subtotal			<u>4,485.75</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>4,485.75</u></u>



INVOICE

Memory Care Investments (Kitchener) Ltd.
 c/o KSV Restructuring Inc.
 220 Bay St, Suite 1300
 Toronto ON M5J 2W4

March 17, 2023

Invoice No: 3041
 HST #: 818808768RT0001

Re: Memory Care Investments (Kitchener) Ltd. (the "Company")

For professional services rendered during February 28, 2023 in our capacity as Receiver and Manager of the Companies (the "Receiver"), including: ¹

- attending calls with Bennett Jones LLP, counsel to the Receiver, including on February 2, 2023;
- continuing to work with Bennet Jones and Aird & Berlis LLP, counsel to Grant Thornton Limited, Court-appointed Trustee in the "Textbook" proceedings;
- advancing settlement discussions with Walter Thompson, David Arsenault and Michael Cane;
- preparing Statements of Receipts and Disbursements;
- attending various internal meetings regarding the settlements;
- dealing with various administrative matters, including HST returns; and
- dealing with all other matters not specifically referenced above.

Total fees and disbursements per attached summary	\$ 1,393.25
HST	181.12
Total	\$ <u>1,574.37</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Memory Care Investments (Kitchener) Ltd.

Time Summary

For the Period Ending February 28, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	800	1.15	920.00
Noah Goldstein	700	0.36	252.00
Other Staff and Administration		0.77	221.25
Subtotal			<u>1,393.25</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,393.25</u></u>

**INVOICE**

Memory Care Investments (Oakville) Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

June 29, 2021

Invoice No: 2242
 HST #: 818808768RT0001

Re: Memory Care Investments (Oakville) Ltd. (the "Company")

For professional services rendered for the period April 1, 2021 to May 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on April 7, 16, 20, 21, 22, 29 and 30, 2021 and May 3, 4, 5, 13, 17, 26, 28 and 31, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Corresponding with Bennett Jones regarding a settlement with Nancy Elliott and Elliott Law Professional Corporation and reviewing settlement documentation and correspondence regarding same (the "Elliott Settlement");
- Preparing the Receiver's Twenty First Report to Court dated May 5, 2021 in order to approve, *inter alia*, the Elliott Settlement;
- Attending at Court on May 13, 2021 in connection with the Elliott Settlement;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 3,737.00
HST	485.81
Total	\$ <u>4,222.81</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Memory Care Investments (Oakville) Ltd.

Time Summary

For the period from April 1, 2021 to May 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.40	1,050.00
Noah Goldstein	650	2.71	1,761.50
Other Staff and Administration		3.03	925.50
Total Fees			<u>3,737.00</u>



INVOICE

Memory Care Investments (Oakville) Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

August 18, 2021

Invoice No: 2295
 HST #: 818808768RT0001

Re: Memory Care Investments (Oakville) Ltd. (the “Company”)

For professional services rendered for the period June 1, 2021 to July 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on June 1, 2, 4, 5, 8, 9, 14, 16, 19, 23, 28, 29 and 30, 2021, and July 2, 3, 7, 16, 18, 19, 20, 24, 25, 26 and 28, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Attending on June 16 and 17, 2021 the discovery of Bruce Stewart;
- Attending on June 21, 2021 the discovery of David Arsenault;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Reviewing [REDACTED] and discussing same with Bennett Jones;
- Attending on July 26, 2021 the examination of John Davies;
- Preparing for an examination of the Receiver to be conducted in August 2021;
- Preparing summaries of the Stewart, Arsenault and Davies examinations;
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	4,409.00
HST		<u>573.17</u>
Total	\$	<u>4,982.17</u>

KSV Restructuring Inc.
Memory Care Investments (Oakville) Ltd.

Time Summary

For the period from June 1, 2021 to July 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	3.075	2,306.25
Noah Goldstein	650	1.500	975.00
Other Staff and Administration		3.560	1,127.75
Total Fees			<u>4,409.00</u>



INVOICE

Memory Care Investments (Oakville) Ltd.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

September 20, 2021

Invoice No: 2338
HST #: 818808768RT0001

Re: Memory Care Investments (Oakville) Ltd. (the “Company”)

For professional services rendered during August 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on August 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 16, 17, 18, 20, 25 and 27, 2021;
- Attending on August 16, 2021 at the discovery of Jonathan Krieger of Grant Thornton LLP;
- Attending on August 26, 2021 at the discovery of Gregory Harris;
- Preparing for the examination of the Receiver (Robert Kofman) to be conducted on August 19, 2021, including:
 - attending a half-day call with Bennett Jones on August 12, 2021
 - creating an index of documents relevant to the examination;
 - reviewing all Court reports issued by the Receiver;
 - reviewing transcripts from the examinations of certain defendants previously conducted, including Jon Davies, Bruce Stewart and David Arsenault;
 - reviewing historical email correspondence drafted by various of the defendants in the context of Mr. Kofman’s examination preparation;
 - preparing various analyses for use by Mr. Kofman at his examination; and
 - corresponding internally;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Attending at the cross-examination of Mr. Kofman on August 19, 2021;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Settling litigation against David Arsenaault, a defendant, and corresponding with Bennett Jones regarding same;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	7,518.75
HST		<u>977.44</u>
Total	\$	<u>8,496.19</u>

KSV Restructuring Inc.
Memory Care Investments (Oakville) Ltd.

Time Summary

For the month ending August 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	7.325	5,493.75
Noah Goldstein	650	2.550	1,657.50
Other Staff and Administration		1.400	367.50
Total Fees			<u>7,518.75</u>



INVOICE

Memory Care Investments (Oakville) Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

January 14, 2022

Invoice No: 2487
 HST #: 818808768RT0001

Re: Memory Care Investments (Oakville) Ltd. (the “Company”)

For professional services rendered during December 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on December 9, 10, 13, 15, 20 and 22, 2021;
- Reviewing various letters prepared by Bennett Jones dated December 15, 2021 to various defendants in the litigation;
- Corresponding with Bennett Jones regarding a voicemail on December 21, 2021 from counsel to Mr. Thompson;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	571.00
HST		74.23
Total	\$	<u>654.23</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Memory Care Investments (Oakville) Ltd.
Time Summary
For the month ending December 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	0.25	187.50
Noah Goldstein	650	0.36	234.00
Other Staff and Administration		0.83	149.50
Subtotal			<u>571.00</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>571.00</u></u>



INVOICE

Memory Care Investments (Oakville) Ltd.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

February 15, 2022

Invoice No: 2524
HST #: 818808768RT0001

Re: Memory Care Investments (Oakville) Ltd. (the “Company”)

For professional services rendered during January 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on January 7, 10, 18, 19, 20 and 25, 2022;
- Reviewing John Davies’ quarterly income reporting received on January 4, 2022;
- Attending a call on January 17, 2022 with TYR LLP, counsel to Raj Singh, regarding Mr. Singh’s settlement and corresponding with Bennett Jones regarding same;
- Reviewing a letter from Peter Wardle, counsel to Greg Harris, dated January 18, 2022 regarding insurance coverage available for Mr. Harris, etc.;
- Reviewing a letter from Miller Thompson LLP, counsel to Walter Thompson dated January 19, 2022 regarding insurance coverage available for Mr. Thompson, etc.;
- Reviewing a letter from Bresver Grossman Chapman & Habas LLP, counsel to Bruce Stewart, dated January 25, 2022 regarding insurance coverage available for Mr. Stewart;
- Reviewing a schedule of insurance coverage available for each Defendant in the litigation;
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,668.40
HST		<u>216.89</u>
Total	\$	<u>1,885.29</u>

KSV Restructuring Inc.
Memory Care Investments (Oakville) Ltd.
Time Summary
For the month ending January 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.27	984.25
Noah Goldstein	675	0.77	519.75
Other Staff and Administration		0.89	164.40
Subtotal			<u>1,668.40</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,668.40</u></u>

Effective January 1, 2022, the hourly rates of Messrs. Kofman and Goldstein increased by \$25.



INVOICE

Memory Care Investments (Oakville) Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

March 18, 2022

Invoice No: 2558
 HST #: 818808768RT0001

Re: Memory Care Investments (Oakville) Ltd. (the “Company”)

For professional services rendered during February 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - attending a long call on February 2nd concerning litigation strategy;
 - reviewing and commenting on February 4th on [REDACTED];
 - reviewing on February 4th [REDACTED];
 - reviewing and commenting on February 15th on [REDACTED];
 - reviewing and commenting on [REDACTED];
- Reviewing support from John Davies for quarterly income reporting;
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release of funds held in trust;
- Reviewing a chart [REDACTED];
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,071.48
HST		<u>139.29</u>
Total	\$	<u>1,210.77</u>

KSV Restructuring Inc.
Memory Care Investments (Oakville) Ltd.
Time Summary
For the month ending February 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.975	755.63
Noah Goldstein	675	0.270	182.25
Other Staff and Administration		0.760	133.60
Subtotal			<u>1,071.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,071.48</u></u>



INVOICE

Memory Care Investments (Oakville) Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

April 19, 2022

Invoice No: 2604
 HST #: 818808768RT0001

Re: Memory Care Investments (Oakville) Ltd. (the “Company”)

For professional services rendered during March 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - drafting and reviewing emails concerning the litigation, including on March 3, 24, 25, 28 29 and 30, 2022;
 - reviewing and commenting on [REDACTED];
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release to KSV of funds it held as security for certain of the Company’s obligations;
- Attending on March 28, 2022 a call with Grant Thornton LLP (“GT”), the Court appointed Trustee of Tier 1 Investments, to discuss the status of the litigation;
- Attending on March 30, 2022 a call with GT and Chaitons LLP, representative counsel to the investors, to discuss the status of the litigation;
- Considering with [REDACTED];
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,043.00
HST		135.59
Total	\$	<u>1,178.59</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Memory Care Investments (Oakville) Ltd.
Time Summary
For the month ending March 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.80	620.00
Noah Goldstein	675	0.36	243.00
Other Staff and Administration		0.99	180.00
Subtotal			<u>1,043.00</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,043.00</u></u>

**kSV advisory inc.**

150 King Street West, Suite 2308

Toronto, Ontario, M5H 1J9

T +1 416 932 6262

F +1 416 932 6266

www.ksvadvisory.com

INVOICE

Memory Care Investments (Oakville) Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

May 24, 2022

Invoice No: 2650
 HST #: 818808768RT0001

Re: Memory Care Investments (Oakville) Ltd. (the “Company”)

For professional services rendered during April 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - attending a call on April 1st concerning litigation strategy;
 - several emails on April 6th regarding a [REDACTED]
 - reviewing several iterations of a [REDACTED]
- Reviewing support information from John Davies and his wife in respect of their quarterly income reporting obligations;
- Attending a call on April 19th with Bennett Jones, Aird & Berlis LLP and Grant Thornton to discuss the litigation strategy;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 1,218.45
HST	158.40
Total	<u>\$ 1,376.85</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Memory Care Investments (Oakville) Ltd.
Time Summary
For the month ending April 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.65	503.75
Noah Goldstein	675	0.82	553.50
Other Staff and Administration		0.92	161.20
Subtotal			<u>1,218.45</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,218.45</u></u>

**kvs advisory inc.**

150 King Street West, Suite 2308

Toronto, Ontario, M5H 1J9

T +1 416 932 6262

F +1 416 932 6266

www.ksvadvisory.com

INVOICE

Memory Care Investments (Oakville) Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

July 18, 2022

Invoice No: 2717
 HST #: 818808768RT0001

Re: Memory Care Investments (Oakville) Ltd. (the "Company")

For professional services rendered from May 1, 2022 to June 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- reviewing and finalizing [REDACTED];
- reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including on June 13, 14, 15 and 29, 2022; and
 - drafting responses, including preparing several schedules;
- reviewing a [REDACTED] and considering same with Bennett Jones, including on June 16, 2022;
- preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 2,360.80
HST	306.90
Total	<u>\$ 2,667.70</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Memory Care Investments (Oakville) Ltd.
Time Summary
For the period May 1, 2022 to June 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.19	922.25
Noah Goldstein	675	1.54	1,039.50
Other Staff and Administration		2.08	399.05
Subtotal			<u>2,360.80</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>2,360.80</u></u>



INVOICE

Memory Care Investments (Oakville) Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

December 22, 2022

Invoice No: 2897
 HST #: 818808768RT0001

Re: Memory Care Investments (Oakville) Ltd. (the “Company”)

For professional services rendered from July 1, 2022 to November 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver;
 - drafting responses throughout the period, including preparing several schedules;
- Reviewing John Davies’ quarterly income reporting received on July 4, 2022 and corresponding with Bennett Jones re same;
- Considering [REDACTED]
- Reviewing and commenting on draft [REDACTED]
- Discussing the status of litigation against the remaining defendants and dealing with Bennett Jones to arrange a meeting with Grant Thornton in this regard;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 3,402.48
HST	442.32
Total	\$ <u>3,844.80</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Memory Care Investments (Oakville) Ltd.

Time Summary

For the period July 1, 2022 to November 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.375	1,065.63
Noah Goldstein	675	3.030	2,045.25
Other Staff and Administration		1.660	291.60
Subtotal			<u>3,402.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>3,402.48</u></u>

**INVOICE**

Memory Care Investments (Oakville) Ltd.
 c/o KSV Restructuring Inc.
 220 Bay St, Suite 1300
 Toronto ON M5J 2W4

February 10, 2023

Invoice No: 2955
 HST #: 818808768RT0001

Re: Memory Care Investments (Oakville) Ltd. (the "Company")

For professional services rendered from December 1, 2022 to January 31, 2023 by KSV Restructuring Inc., in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- drafting [REDACTED] including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver; and
 - preparing schedules supporting the [REDACTED]
- reviewing John Davies' quarterly income reporting received on July 4, 2022;
- discussing [REDACTED] with Bennett Jones;
- discussing [REDACTED] Bennett Jones;
- attending a meeting on January 17, 2023 with Aird & Berlis LLP, Grant Thornton LLP and Bennett Jones regarding the status of litigation in these proceedings, and next steps;
- preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 4,541.75
HST	590.43
Total	<u>\$ 5,132.18</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Memory Care Investments (Oakville) Ltd.

Time Summary

For the Period from December 1, 2022 to January 31, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775-80	2.000	1,587.50
Noah Goldstein	675-700	2.620	1,791.00
Other Staff and Administration		3.870	1,163.25
Subtotal			<u>4,541.75</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>4,541.75</u></u>

**ksv advisory inc.**

220 Bay St., Suite 1300 PO Box 20

Toronto, Ontario, M5J 2W4

T +1 416 932 6262

F +1 416 932 6266

www.ksvadvisory.com

INVOICE

Memory Care Investments (Oakville) Ltd.
 c/o KSV Restructuring Inc.
 220 Bay St, Suite 1300
 Toronto ON M5J 2W4

March 17, 2023

Invoice No: 3042
 HST #: 818808768RT0001

Re: Memory Care Investments (Oakville) Ltd. (the "Company")

For professional services rendered during February 28, 2023 in our capacity as Receiver and Manager of the Companies (the "Receiver"), including: ¹

- attending calls with Bennett Jones LLP, counsel to the Receiver, including on February 2, 2023;
- continuing to work with Bennet Jones and Aird & Berlis LLP, counsel to Grant Thornton Limited, Court-appointed Trustee in the "Textbook" proceedings;
- advancing settlement discussions with Walter Thompson, David Arsenault and Michael Cane;
- preparing Statements of Receipts and Disbursements;
- attending various internal meetings regarding the settlements;
- dealing with various administrative matters, including HST returns; and
- dealing with all other matters not specifically referenced above.

Total fees and disbursements per attached summary	\$ 1,419.50
HST	184.54
Total	<u>\$ 1,604.04</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Memory Care Investments (Oakville) Ltd.
Time Summary
For the Period Ending February 28, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	800	1.15	920.00
Noah Goldstein	700	0.36	252.00
Other Staff and Administration		0.92	247.50
Subtotal			<u>1,419.50</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,419.50</u></u>



INVOICE

1703858 Ontario Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

June 29, 2021

Invoice No: 2240

HST #: 818808768RT0001

Re: 1703858 Ontario Inc. (the "Company")

For professional services rendered for the period April 1, 2021 to May 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on April 7, 16, 20, 21, 22, 29 and 30, 2021 and May 3, 4, 5, 13, 17, 26, 28 and 31, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Corresponding with Bennett Jones regarding a settlement with Nancy Elliott and Elliott Law Professional Corporation and reviewing settlement documentation and correspondence regarding same (the "Elliott Settlement");
- Preparing the Receiver's Twenty First Report to Court dated May 5, 2021 in order to approve, *inter alia*, the Elliott Settlement;
- Attending at Court on May 13, 2021 in connection with the Elliott Settlement;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 3,646.75
HST	474.08
Total	\$ <u>4,120.83</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.

1703858 Ontario Inc.

Time Summary

For the period from April 1, 2021 to May 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.40	1,050.00
Noah Goldstein	650	2.71	1,761.50
Other Staff and Administration		2.61	835.25
Total Fees			<u>3,646.75</u>



INVOICE

1703858 Ontario Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

August 18, 2021

Invoice No: 2293

HST #: 818808768RT0001

Re: 1703858 Ontario Inc. (the "Company")

For professional services rendered for the period June 1, 2021 to July 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on June 1, 2, 4, 5, 8, 9, 14, 16, 19, 23, 28, 29 and 30, 2021, and July 2, 3, 7, 16, 18, 19, 20, 24, 25, 26 and 28, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Attending on June 16 and 17, 2021 the discovery of Bruce Stewart;
- Attending on June 21, 2021 the discovery of David Arsenault;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Reviewing [REDACTED] and discussing same with Bennett Jones;
- Attending on July 26, 2021 the examination of John Davies;
- Preparing for an examination of the Receiver to be conducted in August 2021;
- Preparing summaries of the Stewart, Arsenault and Davies examinations;
- Preparing the Company's monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	4,290.25
HST		<u>553.73</u>
Total	\$	<u><u>4,847.98</u></u>

KSV Restructuring Inc.

1703858 Ontario Inc.

Time Summary

For the period from June 1, 2021 to July 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	3.075	2,306.25
Noah Goldstein	650	1.500	975.00
Other Staff and Administration		3.310	1,009.00
Total Fees			<u>4,290.25</u>



INVOICE

1703858 Ontario Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

September 20, 2021

Invoice No: 2336
HST #: 818808768RT0001

Re: 1703858 Ontario Inc. (the “Company”)

For professional services rendered during August 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on August 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 16, 17, 18, 20, 25 and 27, 2021;
- Attending on August 16, 2021 at the discovery of Jonathan Krieger of Grant Thornton LLP;
- Attending on August 26, 2021 at the discovery of Gregory Harris;
- Preparing for the examination of the Receiver (Robert Kofman) to be conducted on August 19, 2021, including:
 - attending a half-day call with Bennett Jones on August 12, 2021
 - creating an index of documents relevant to the examination;
 - reviewing all Court reports issued by the Receiver;
 - reviewing transcripts from the examinations of certain defendants previously conducted, including Jon Davies, Bruce Stewart and David Arsenaault;
 - reviewing historical email correspondence drafted by various of the defendants in the context of Mr. Kofman’s examination preparation;
 - preparing various analyses for use by Mr. Kofman at his examination; and
 - corresponding internally;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Attending at the cross-examination of Mr. Kofman on August 19, 2021;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Settling litigation against David Arsenault, a defendant, and corresponding with Bennett Jones regarding same;

Preparing the Company's monthly HST return; and

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	7,423.75
HST		<u>965.09</u>
Total	\$	<u><u>8,388.84</u></u>

KSV Restructuring Inc.

1703858 Ontario Inc.

Time Summary

For the month ending August 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	7.325	5,493.75
Noah Goldstein	650	2.550	1,657.50
Other Staff and Administration		1.200	272.50
Total Fees			<u>7,423.75</u>



INVOICE

1703858 Ontario Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

December 15, 2021

Invoice No: 2444

HST #: 818808768RT0001

Re: 1703858 Ontario Inc. (the "Company")

For professional services rendered from September 1, 2021 to November 30, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on September 1, 3, 6, 10, 12, 13, 14, 15 and 29, 2021, October 1, 15, 16, 17, 21 and 31, 2021 and November 1, 15, 17, 20 and 23, 2021;
- Corresponding with Bennett Jones regarding the examination of Walter Thompson;
- Settling litigation against David Arsenault, a defendant, and corresponding with Bennett Jones regarding same;
- Reviewing quarterly income reporting for John and Judith Davies and corresponding with Bennett Jones regarding same;
- Reviewing a [REDACTED] and considering same with Bennett Jones;
- Reviewing a [REDACTED] prepared by Bennett Jones;
- Attending a call on November 15, 2021 with Bennett Jones to discuss next steps in the litigation;
- Preparing the interim report of the Receiver (the "Interim Report") as required under Section 246 of the *Bankruptcy and Insolvency Act*;
- Preparing a schedule of receipts and disbursements in connection with the Interim Report;
- Preparing the Company's monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	2,596.29
HST		<u>337.52</u>
Total	\$	<u><u>2,933.81</u></u>

KSV Restructuring Inc.
1703858 Ontario Inc.

Time Summary

For the period September 1, 2021 to November 30, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.50	1,125.00
Noah Goldstein	650	1.28	832.00
Other Staff and Administration		4.23	634.50
Subtotal			<u>2,591.50</u>
Out of pocket disbursements			4.79
Total Fees			<u><u>2,596.29</u></u>



INVOICE

1703858 Ontario Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

January 14, 2022

Invoice No: 2485
 HST #: 818808768RT0001

Re: 1703858 Ontario Inc. (the "Company")

For professional services rendered during December 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on December 9, 10, 13, 15, 20 and 22, 2021;
- Reviewing various letters prepared by Bennett Jones dated December 15, 2021 to various defendants in the litigation;
- Corresponding with Bennett Jones regarding a voicemail on December 21, 2021 from counsel to Mr. Thompson;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 571.00
HST	74.23
Total	\$ <u>645.23</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.

1703858 Ontario Inc.

Time Summary

For the month ending December 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	0.25	187.50
Noah Goldstein	650	0.36	234.00
Other Staff and Administration		0.83	149.50
Subtotal			571.00
Out of pocket disbursements			-
Total Fees and Disbursements			571.00



INVOICE

1703858 Ontario Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

February 15, 2022

Invoice No: 2522
HST #: 818808768RT0001

Re: 1703858 Ontario Inc. (the “Company”)

For professional services rendered during January 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on January 7, 10, 18, 19, 20 and 25, 2022;
- Reviewing John Davies’ quarterly income reporting received on January 4, 2022;
- Attending a call on January 17, 2022 with TYR LLP, counsel to Raj Singh, regarding Mr. Singh’s settlement and corresponding with Bennett Jones regarding same;
- Reviewing a letter from Peter Wardle, counsel to Greg Harris, dated January 18, 2022 regarding insurance coverage available for Mr. Harris, etc.;
- Reviewing a letter from Miller Thompson LLP, counsel to Walter Thompson dated January 19, 2022 regarding insurance coverage available for Mr. Thompson, etc.;
- Reviewing a letter from Bresver Grossman Chapman & Habas LLP, counsel to Bruce Stewart, dated January 25, 2022 regarding insurance coverage available for Mr. Stewart;
- Reviewing a schedule of insurance coverage available for each Defendant in the litigation;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,668.40
HST		216.89
Total	\$	<u>1,885.29</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
 1703858 Ontario Inc.
Time Summary
 For the month ending January 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.27	984.25
Noah Goldstein	675	0.77	519.75
Other Staff and Administration		0.89	164.40
Subtotal			<u>1,668.40</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,668.40</u></u>

Effective January 1, 2022, the hourly rates of Messrs. Kofman and Goldstein increased by \$25.



INVOICE

1703858 Ontario Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

March 18, 2022

Invoice No: 2556
 HST #: 818808768RT0001

Re: 1703858 Ontario Inc. (the “Company”)

For professional services rendered during February 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - attending a long call on February 2nd concerning litigation strategy;
 - reviewing and commenting on February 4th on [REDACTED];
 - reviewing on February 4th [REDACTED] Stewart;
 - reviewing and commenting on February 15th on [REDACTED];
 - reviewing and commenting on [REDACTED];
- Reviewing support from John Davies for quarterly income reporting;
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release of funds held in trust;
- Reviewing a chart [REDACTED];
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,071.48
HST		<u>139.29</u>
Total	\$	<u>1,210.77</u>

KSV Restructuring Inc.
1703858 Ontario Inc.
Time Summary
For the month ending February 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.975	755.63
Noah Goldstein	675	0.270	182.25
Other Staff and Administration		0.760	133.60
Subtotal			<u>1,071.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,071.48</u></u>



INVOICE

1703858 Ontario Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

April 19, 2022

Invoice No: 2602
 HST #: 818808768RT0001

Re: 1703858 Ontario Inc. (the “Company”)

For professional services rendered during March 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - drafting and reviewing emails concerning the litigation, including on March 3, 24, 25, 28 29 and 30, 2022;
 - reviewing and commenting on [REDACTED]
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release to KSV of funds it held as security for certain of the Company’s obligations;
- Attending on March 28, 2022 a call with Grant Thornton LLP (“GT”), the Court appointed Trustee of Tier 1 Investments, to discuss the status of the litigation;
- Attending on March 30, 2022 a call with GT and Chaitons LLP, representative counsel to the investors, to discuss the status of the litigation;
- Considering with [REDACTED]
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 1,043.00
HST	135.59
Total	\$ <u>1,178.59</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
1703858 Ontario Inc.
Time Summary
For the month ending March 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.80	620.00
Noah Goldstein	675	0.36	243.00
Other Staff and Administration		0.99	180.00
Subtotal			<u>1,043.00</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,043.00</u></u>



INVOICE

1703858 Ontario Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

May 24, 2022

Invoice No: 2648
 HST #: 818808768RT0001

Re: 1703858 Ontario Inc. (the “Company”)

For professional services rendered during April 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - attending a call on April 1st concerning litigation strategy;
 - several emails on April 6th regarding a [REDACTED]
 - reviewing several iterations of a [REDACTED]
- Reviewing support information from John Davies and his wife in respect of their quarterly income reporting obligations;
- Attending a call on April 19th with Bennett Jones, Aird & Berlis LLP and Grant Thornton to discuss the litigation strategy;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 1,218.45
HST	158.40
Total	\$ <u>1,376.85</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
1703858 Ontario Inc.
Time Summary
For the month ending April 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.65	503.75
Noah Goldstein	675	0.82	553.50
Other Staff and Administration		0.92	161.20
Subtotal			<u>1,218.45</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,218.45</u></u>



INVOICE

1703858 Ontario Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

July 18, 2022

Invoice No: 2715
 HST #: 818808768RT0001

Re: 1703858 Ontario Inc. (the “Company”)

For professional services rendered from May 1, 2022 to June 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:

¹

- reviewing and finalizing [REDACTED]
- reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including on June 13, 14, 15 and 29, 2022; and
 - drafting responses, including preparing several schedules;
- reviewing a [REDACTED] and considering same with Bennett Jones, including on June 16, 2022;
- preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 2,360.80
HST	306.90
Total	\$ <u>2,667.70</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
1703858 Ontario Inc.

Time Summary

For the period May 1, 2022 to June 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.19	922.25
Noah Goldstein	675	1.54	1,039.50
Other Staff and Administration		2.08	399.05
Subtotal			<u>2,360.80</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>2,360.80</u></u>



INVOICE

1703858 Ontario Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

December 22, 2022

Invoice No: 2895
 HST #: 818808768RT0001

Re: 1703858 Ontario Inc. (the "Company")

For professional services rendered from July 1, 2022 to November 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:

¹

- Reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver;
 - drafting responses throughout the period, including preparing several schedules;
- Reviewing John Davies' quarterly income reporting received on July 4, 2022 and corresponding with Bennett Jones re same;
- Considering [REDACTED]
- Reviewing and commenting on [REDACTED]
- Discussing the status of litigation against the remaining defendants and dealing with Bennett Jones to arrange a meeting with Grant Thornton in this regard;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 3,402.48
HST	442.32
Total	\$ <u>3,844.80</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
1703858 Ontario Inc.

Time Summary

For the period July 1, 2022 to November 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.375	1,065.63
Noah Goldstein	675	3.030	2,045.25
Other Staff and Administration		1.660	291.60
Subtotal			<u>3,402.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>3,402.48</u></u>



ksv advisory inc.
220 Bay St., Suite 1300 PO Box 20
Toronto, Ontario, M5J 2W4
T +1 416 932 6262
F +1 416 932 6266

www.ksvadvisory.com

INVOICE

1703858 Ontario Inc.
c/o KSV Restructuring Inc.
220 Bay St, Suite 1300
Toronto ON M5J 2W4

February 10, 2023

Invoice No: 2953
HST #: 818808768RT0001

Re: 1703858 Ontario Inc. (the "Company")

For professional services rendered from December 1, 2022 to January 31, 2023 by KSV Restructuring Inc., in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- drafting [REDACTED] including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver; and
 - preparing schedules supporting the [REDACTED]
- reviewing John Davies' quarterly income reporting received on July 4, 2022;
- discussing [REDACTED] with Bennett Jones;
- discussing [REDACTED] with Bennett Jones;
- attending a meeting on January 17, 2023 with Aird & Berlis LLP, Grant Thornton LLP and Bennett Jones regarding the status of litigation in these proceedings, and next steps;
- preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 7,768.00
HST	1,009.84
Total	\$ <u>8,777.84</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
1703858 Ontario Inc.

Time Summary

For the Period from December 1, 2022 to January 31, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775-800	2.00	1,587.50
Noah Goldstein	675-700	2.62	1,791.00
Other Staff and Administration		12.42	4,389.50
Subtotal			<u>7,768.00</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>7,768.00</u></u>



INVOICE

1703858 Ontario Inc.
 c/o KSV Restructuring Inc.
 220 Bay St, Suite 1300
 Toronto ON M5J 2W4

March 17, 2023

Invoice No: 3040
 HST #: 818808768RT0001

Re: 1703858 Ontario Inc. (the "Company")

For professional services rendered during February 28, 2023 in our capacity as Receiver and Manager of the Companies (the "Receiver"), including: ¹

- attending calls with Bennett Jones LLP, counsel to the Receiver, including on February 2, 2023;
- continuing to work with Bennet Jones and Aird & Berlis LLP, counsel to Grant Thornton Limited, Court-appointed Trustee in the "Textbook" proceedings;
- advancing settlement discussions with Walter Thompson, David Arsenault and Michael Cane;
- preparing Statements of Receipts and Disbursements;
- attending various internal meetings regarding the settlements;
- dealing with various administrative matters, including HST returns; and
- dealing with all other matters not specifically referenced above.

Total fees and disbursements per attached summary	\$ 1,504.25
HST	<u>195.55</u>
Total	<u>\$ 1,699.80</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.

1703858 Ontario Inc.

Time Summary

For the Period Ending February 28, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	800	1.15	920.00
Noah Goldstein	700	0.36	252.00
Other Staff and Administration		1.59	332.25
Subtotal			<u>1,504.25</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,504.25</u></u>



INVOICE

Legacy Lane Investments Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

June 29, 2021

Invoice No: 2239

HST #: 818808768RT0001

Re: Legacy Lane Investments Ltd. (the “Company”)

For professional services rendered for the period April 1, 2021 to May 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on April 7, 16, 20, 21, 22, 29 and 30, 2021 and May 3, 4, 5, 13, 17, 26, 28 and 31, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Corresponding with Bennett Jones regarding a settlement with Nancy Elliott and Elliott Law Professional Corporation and reviewing settlement documentation and correspondence regarding same (the “Elliott Settlement”);
- Preparing the Receiver’s Twenty First Report to Court dated May 5, 2021 in order to approve, *inter alia*, the Elliott Settlement;
- Attending at Court on May 13, 2021 in connection with the Elliott Settlement;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 3,791.75
HST	492.93
Total	\$ <u>4,284.68</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Legacy Lane Investments Ltd.

Time Summary

For the period from April 1, 2021 to May 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.40	1,050.00
Noah Goldstein	650	2.71	1,761.50
Other Staff and Administration		3.41	980.25
Total Fees			<u>3,791.75</u>



INVOICE

Legacy Lane Investments Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

August 18, 2021

Invoice No: 2292
 HST #: 818808768RT0001

Re: Legacy Lane Investments Ltd. (the “Company”)

For professional services rendered for the period June 1, 2021 to July 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on June 1, 2, 4, 5, 8, 9, 14, 16, 19, 23, 28, 29 and 30, 2021, and July 2, 3, 7, 16, 18, 19, 20, 24, 25, 26 and 28, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Attending on June 16 and 17, 2021 the discovery of Bruce Stewart;
- Attending on June 21, 2021 the discovery of David Arsenault;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Reviewing [REDACTED] and discussing same with Bennett Jones;
- Attending on July 26, 2021 the examination of John Davies;
- Preparing for an examination of the Receiver to be conducted in August 2021;
- Preparing summaries of the Stewart, Arsenault and Davies examinations;
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	4,252.25
HST		<u>552.79</u>
Total	\$	<u>4,805.04</u>

KSV Restructuring Inc.
Legacy Lane Investments Ltd.

Time Summary

For the period from June 1, 2021 to July 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	3.075	2,306.25
Noah Goldstein	650	1.500	975.00
Other Staff and Administration		3.120	971.00
Total Fees			<u>4,252.25</u>



INVOICE

Legacy Lane Investments Ltd.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

September 20, 2021

Invoice No: 2335
HST #: 818808768RT0001

Re: Legacy Lane Investments Ltd. (the “Company”)

For professional services rendered during August 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on August 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 16, 17, 18, 20, 25 and 27, 2021;
- Attending on August 16, 2021 at the discovery of Jonathan Krieger of Grant Thornton LLP;
- Attending on August 26, 2021 at the discovery of Gregory Harris;
- Preparing for the examination of the Receiver (Robert Kofman) to be conducted on August 19, 2021, including:
 - attending a half-day call with Bennett Jones on August 12, 2021
 - creating an index of documents relevant to the examination;
 - reviewing all Court reports issued by the Receiver;
 - reviewing transcripts from the examinations of certain defendants previously conducted, including Jon Davies, Bruce Stewart and David Arsenaault;
 - reviewing historical email correspondence drafted by various of the defendants in the context of Mr. Kofman’s examination preparation;
 - preparing various analyses for use by Mr. Kofman at his examination; and
 - corresponding internally;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Attending at the cross-examination of Mr. Kofman on August 19, 2021;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Settling litigation against David Arsenault, a defendant, and corresponding with Bennett Jones regarding same;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	7,468.75
HST		<u>970.94</u>
Total	\$	<u>8,439.69</u>

KSV Restructuring Inc.
Legacy Lane Investments Ltd.
Time Summary
For the month ending August 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	7.325	5,493.75
Noah Goldstein	650	2.550	1,657.50
Other Staff and Administration		1.150	317.50
Total Fees			<u>7,468.75</u>



INVOICE

Legacy Lane Investments Ltd.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

December 15, 2021

Invoice No: 2443
HST #: 818808768RT0001

Re: Legacy Lane Investments Ltd. (the “Company”)

For professional services rendered from September 1, 2021 to November 30, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on September 1, 3, 6, 10, 12, 13, 14, 15 and 29, 2021, October 1, 15, 16, 17, 21 and 31, 2021 and November 1, 15, 17, 20 and 23, 2021;
- Corresponding with Bennett Jones regarding the examination of Walter Thompson;
- Settling litigation against David Arseneault, a defendant, and corresponding with Bennett Jones regarding same;
- Reviewing quarterly income reporting for John and Judith Davies and corresponding with Bennett Jones regarding same;
- Reviewing a [REDACTED] and considering same with Bennett Jones;
- Reviewing a [REDACTED] prepared by Bennett Jones;
- Attending a call on November 15, 2021 with Bennett Jones to discuss next steps in the litigation;
- Preparing the interim report of the Receiver (the “Interim Report”) as required under Section 246 of the *Bankruptcy and Insolvency Act*;
- Preparing a schedule of receipts and disbursements in connection with the Interim Report;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	2,358.79
HST		<u>306.64</u>
Total	\$	<u><u>2,665.43</u></u>

KSV Restructuring Inc.
Legacy Lane Investments Ltd.

Time Summary

For the period September 1, 2021 to November 30, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.50	1,125.00
Noah Goldstein	650	1.28	832.00
Other Staff and Administration		2.43	397.00
Subtotal			<u>2,354.00</u>
Out of pocket disbursements			4.79
Total Fees			<u><u>2,358.79</u></u>



INVOICE

Legacy Lane Investments Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

January 14, 2022

Invoice No: 2484
 HST #: 818808768RT0001

Re: Legacy Lane Investments Ltd. (the “Company”)

For professional services rendered during December 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on December 9, 10, 13, 15, 20 and 22, 2021;
- Reviewing various letters prepared by Bennett Jones dated December 15, 2021 to various defendants in the litigation;
- Corresponding with Bennett Jones regarding a voicemail on December 21, 2021 from counsel to Mr. Thompson;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	471.00
HST		61.23
Total	\$	<u>532.23</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Legacy Lane Investments Ltd.

Time Summary

For the month ending December 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	0.25	187.50
Noah Goldstein	650	0.36	234.00
Other Staff and Administration		0.33	49.50
Subtotal			471.00
Out of pocket disbursements			-
Total Fees and Disbursements			471.00



INVOICE

Legacy Lane Investments Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

February 15, 2022

Invoice No: 2521
 HST #: 818808768RT0001

Re: Legacy Lane Investments Ltd. (the “Company”)

For professional services rendered during January 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on January 7, 10, 18, 19, 20 and 25, 2022;
- Reviewing John Davies’ quarterly income reporting received on January 4, 2022;
- Attending a call on January 17, 2022 with TYR LLP, counsel to Raj Singh, regarding Mr. Singh’s settlement and corresponding with Bennett Jones regarding same;
- Reviewing a letter from Peter Wardle, counsel to Greg Harris, dated January 18, 2022 regarding insurance coverage available for Mr. Harris, etc.;
- Reviewing a letter from Miller Thompson LLP, counsel to Walter Thompson dated January 19, 2022 regarding insurance coverage available for Mr. Thompson, etc.;
- Reviewing a letter from Bresver Grossman Chapman & Habas LLP, counsel to Bruce Stewart, dated January 25, 2022 regarding insurance coverage available for Mr. Stewart;
- Reviewing a schedule of insurance coverage available for each Defendant in the litigation;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,668.40
HST		216.89
Total	\$	<u>1,885.29</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
 Legacy Lane Investments Ltd.
Time Summary
 For the month ending January 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.27	984.25
Noah Goldstein	675	0.77	519.75
Other Staff and Administration		0.33	164.40
Subtotal			<u>1,668.40</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,668.40</u></u>

Effective January 1, 2022, the hourly rates of Messrs. Kofman and Goldstein increased by \$25.



INVOICE

Legacy Lane Investments Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

March 18, 2022

Invoice No: 2555
 HST #: 818808768RT0001

Re: Legacy Lane Investments Ltd. (the “Company”)

For professional services rendered during February 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - attending a long call on February 2nd concerning litigation strategy;
 - reviewing and commenting on February 4th on [REDACTED];
 - reviewing on February 4th [REDACTED];
 - reviewing and commenting on February 15th on [REDACTED];
 - reviewing and commenting on a [REDACTED];
- Reviewing support from John Davies for quarterly income reporting;
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release of funds held in trust;
- Reviewing a chart [REDACTED];
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,071.48
HST		<u>139.29</u>
Total	\$	<u>1,210.77</u>

KSV Restructuring Inc.
Legacy Lane Investments Ltd.
Time Summary
For the month ending February 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.975	755.63
Noah Goldstein	675	0.270	182.25
Other Staff and Administration		0.760	133.60
Subtotal			<u>1,071.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,071.48</u></u>



INVOICE

Legacy Lane Investments Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

April 19, 2022

Invoice No: 2601
 HST #: 818808768RT0001

Re: Legacy Lane Investments Ltd. (the “Company”)

For professional services rendered during March 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - drafting and reviewing emails concerning the litigation, including on March 3, 24, 25, 28 29 and 30, 2022;
 - reviewing and commenting on [REDACTED]
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release to KSV of funds it held as security for certain of the Company’s obligations;
- Attending on March 28, 2022 a call with Grant Thornton LLP (“GT”), the Court appointed Trustee of Tier 1 Investments, to discuss the status of the litigation;
- Attending on March 30, 2022 a call with GT and Chaitons LLP, representative counsel to the investors, to discuss the status of the litigation;
- Considering with [REDACTED]
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 1,043.00
HST	135.59
Total	\$ <u>1,178.59</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Legacy Lane Investments Ltd.
Time Summary
For the month ending March 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.80	620.00
Noah Goldstein	675	0.36	243.00
Other Staff and Administration		0.99	180.00
Subtotal			<u>1,043.00</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,043.00</u></u>



INVOICE

Legacy Lane Investments Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

May 24, 2022

Invoice No: 2647
 HST #: 818808768RT0001

Re: Legacy Lane Investments Ltd. (the “Company”)

For professional services rendered during April 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - attending a call on April 1st concerning litigation strategy;
 - several emails on April 6th regarding [REDACTED]
 - reviewing several iterations of a [REDACTED]
- Reviewing support information from John Davies and his wife in respect of their quarterly income reporting obligations;
- Attending a call on April 19th with Bennett Jones, Aird & Berlis LLP and Grant Thornton to discuss the litigation strategy;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 1,218.45
HST	158.40
Total	\$ <u>1,376.85</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Legacy Lane Investments Ltd.
Time Summary
For the month ending April 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.65	503.75
Noah Goldstein	675	0.82	553.50
Other Staff and Administration		0.92	161.20
Subtotal			<u>1,218.45</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,218.45</u></u>



INVOICE

Legacy Lane Investments Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

July 18, 2022

Invoice No: 2714
 HST #: 818808768RT0001

Re: Legacy Lane Investments Ltd. (the “Company”)

For professional services rendered from May 1, 2022 to June 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:

¹

- reviewing and finalizing [REDACTED];
- reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including on June 13, 14, 15 and 29, 2022; and
 - drafting responses, including preparing several schedules;
- reviewing a [REDACTED] and considering same with Bennett Jones, including on June 16, 2022;
- preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 2,400.80
HST	312.10
Total	\$ <u>2,712.90</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Legacy Lane Investments Ltd.

Time Summary

For the period May 1, 2022 to June 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.19	922.25
Noah Goldstein	675	1.54	1,039.50
Other Staff and Administration		2.33	439.05
Subtotal			<u>2,400.80</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>2,400.80</u></u>



INVOICE

Legacy Lane Investments Ltd.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

December 22, 2022

Invoice No: 2894
 HST #: 818808768RT0001

Re: Legacy Lane Investments Ltd. (the "Company")

For professional services rendered from July 1, 2022 to November 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:

¹

- Reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver;
 - drafting responses throughout the period, including preparing several schedules;
- Reviewing John Davies' quarterly income reporting received on July 4, 2022 and corresponding with Bennett Jones re same;
- Considering [REDACTED]
- Reviewing and commenting on [REDACTED];
- Discussing the status of litigation against the remaining defendants and dealing with Bennett Jones to arrange a meeting with Grant Thornton in this regard;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 3,322.48
HST	431.92
Total	\$ <u>3,754.40</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Legacy Lane Investments Ltd.

Time Summary

For the period July 1, 2022 to November 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.375	1,065.63
Noah Goldstein	675	3.030	2,045.25
Other Staff and Administration		1.260	211.60
Subtotal			<u>3,322.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>3,322.48</u></u>



INVOICE

Legacy Lane Investments Ltd.
 c/o KSV Restructuring Inc.
 220 Bay St, Suite 1300
 Toronto ON M5J 2W4

February 10, 2023

Invoice No: 2952
 HST #: 818808768RT0001

Re: Legacy Lane Investments Ltd. (the “Company”)

For professional services rendered from December 1, 2022 to January 31, 2023 by KSV Restructuring Inc., in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- drafting [REDACTED] including:
 - corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver; and
 - preparing schedules supporting the [REDACTED]
- reviewing John Davies’ quarterly income reporting received on July 4, 2022;
- discussing [REDACTED] with Bennett Jones;
- discussing [REDACTED] with Bennett Jones;
- attending a meeting on January 17, 2023 with Aird & Berlis LLP, Grant Thornton LLP and Bennett Jones regarding the status of litigation in these proceedings, and next steps;
- preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 4,531.75
HST	589.13
Total	\$ <u>5,120.88</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Legacy Lane Investments Ltd.

Time Summary

For the Period from December 1, 2022 to January 31, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775-800	2.00	1,587.50
Noah Goldstein	675-700	2.62	1,791.00
Other Staff and Administration		3.02	1,153.25
Subtotal			<u>4,531.75</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>4,531.75</u></u>



INVOICE

Legacy Lane Investments Ltd.
 c/o KSV Restructuring Inc.
 220 Bay St, Suite 1300
 Toronto ON M5J 2W4

March 17, 2023

Invoice No: 3039
 HST #: 818808768RT0001

Re: Legacy Lane Investments Ltd. (the "Company")

For professional services rendered during February 28, 2023 in our capacity as Receiver and Manager of the Companies (the "Receiver"), including: ¹

- attending calls with Bennett Jones LLP, counsel to the Receiver, including on February 2, 2023;
- continuing to work with Bennet Jones and Aird & Berlis LLP, counsel to Grant Thornton Limited, Court-appointed Trustee in the "Textbook" proceedings;
- advancing settlement discussions with Walter Thompson, David Arsenault and Michael Cane;
- preparing Statements of Receipts and Disbursements;
- attending various internal meetings regarding the settlements;
- dealing with various administrative matters, including HST returns; and
- dealing with all other matters not specifically referenced above.

Total fees and disbursements per attached summary	\$ 1,419.50
HST	<u>184.54</u>
Total	<u>\$ 1,604.04</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Legacy Lane Investments Ltd.

Time Summary

For the Period Ending February 28, 2023

Personnel	Rate	Hours	Amount (\$)
Robert Kofman	800	1.15	920.00
Noah Goldstein	700	0.36	252.00
Other Staff and Administration		0.92	247.50
Subtotal			<u>1,419.50</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,419.50</u></u>

**ksv advisory inc.**

150 King Street West, Suite 2308
 Toronto, Ontario, M5H 1J9
 T +1 416 932 6262
 F +1 416 932 6266
 www.ksvadvisory.com

INVOICE

Textbook (525 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

June 29, 2021

Invoice No: 2237
 HST #: 818808768RT0001

Re: Textbook (525 Princess Street) Inc. (the "Company")

For professional services rendered for the period April 1, 2021 to May 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on April 7, 16, 20, 21, 22, 29 and 30, 2021 and May 3, 4, 5, 13, 17, 26, 28 and 31, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Corresponding with Bennett Jones regarding a settlement with Nancy Elliott and Elliott Law Professional Corporation and reviewing settlement documentation and correspondence regarding same (the "Elliott Settlement");
- Preparing the Receiver's Twenty First Report to Court dated May 5, 2021 in order to approve, *inter alia*, the Elliott Settlement;
- Attending at Court on May 13, 2021 in connection with the Elliott Settlement;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	3,795.75
HST		493.45
Total	\$	<u>4,289.20</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (525 Princess Street) Inc.

Time Summary

For the period from April 1, 2021 to May 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.40	1,050.00
Noah Goldstein	650	2.71	1,761.50
Other Staff and Administration		3.38	984.25
Total Fees			<u>3,795.75</u>

**ksv advisory inc.**

150 King Street West, Suite 2308
Toronto, Ontario, M5H 1J9
T +1 416 932 6262
F +1 416 932 6266
www.ksvadvisory.com

INVOICE

Textbook (525 Princess Street) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

August 18, 2021

Invoice No: 2290
HST #: 818808768RT0001

Re: Textbook (525 Princess Street) Inc. (the "Company")

For professional services rendered for the period June 1, 2021 to July 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on June 1, 2, 4, 5, 8, 9, 14, 16, 19, 23, 28, 29 and 30, 2021, and July 2, 3, 7, 16, 18, 19, 20, 24, 25, 26 and 28, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Attending on June 16 and 17, 2021 the discovery of Bruce Stewart;
- Attending on June 21, 2021 the discovery of David Arsenault;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Reviewing [REDACTED] and discussing same with Bennett Jones;
- Attending on July 26, 2021 the examination of John Davies;
- Preparing for an examination of the Receiver to be conducted in August 2021;
- Preparing summaries of the Stewart, Arsenault and Davies examinations;
- Preparing the Company's monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	4,374.50
HST		<u>568.69</u>
Total	\$	<u>4,943.19</u>

KSV Restructuring Inc.
Textbook (525 Princess Street) Inc.

Time Summary

For the period from June 1, 2021 to July 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	3.075	2,306.25
Noah Goldstein	650	1.500	975.00
Other Staff and Administration		3.550	1,093.25
Total Fees			<u>4,374.50</u>



ksv advisory inc.

150 King Street West, Suite 2308
Toronto, Ontario, M5H 1J9
T +1 416 932 6262
F +1 416 932 6266
www.ksvadvisory.com

INVOICE

Textbook (525 Princess Street) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

September 20, 2021

Invoice No: 2333
HST #: 818808768RT0001

Re: Textbook (525 Princess Street) Inc. (the "Company")

For professional services rendered during August 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on August 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 16, 17, 18, 20, 25 and 27, 2021;
- Attending on August 16, 2021 at the discovery of Jonathan Krieger of Grant Thornton LLP;
- Attending on August 26, 2021 at the discovery of Gregory Harris;
- Preparing for the examination of the Receiver (Robert Kofman) to be conducted on August 19, 2021, including:
 - attending a half-day call with Bennett Jones on August 12, 2021
 - creating an index of documents relevant to the examination;
 - reviewing all Court reports issued by the Receiver;
 - reviewing transcripts from the examinations of certain defendants previously conducted, including Jon Davies, Bruce Stewart and David Arsenault;
 - reviewing historical email correspondence drafted by various of the defendants in the context of Mr. Kofman's examination preparation;
 - preparing various analyses for use by Mr. Kofman at his examination; and
 - corresponding internally;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Attending at the cross-examination of Mr. Kofman on August 19, 2021;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Settling litigation against David Arsenault, a defendant, and corresponding with Bennett Jones regarding same;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	7,518.75
HST		<u>977.44</u>
Total	\$	<u>8,496.19</u>

KSV Restructuring Inc.
Textbook (525 Princess Street) Inc.
Time Summary
For the month ending August 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	7.325	5,493.75
Noah Goldstein	650	2.550	1,657.50
Other Staff and Administration		1.400	367.50
Total Fees			<u>7,518.75</u>

**ksv advisory inc.**

150 King Street West, Suite 2308
Toronto, Ontario, M5H 1J9
T +1 416 932 6262
F +1 416 932 6266
www.ksvadvisory.com

INVOICE

Textbook (525 Princess Street) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

December 15, 2021

Invoice No: 2441
HST #: 818808768RT0001

Re: Textbook (525 Princess Street) Inc. (the “Company”)

For professional services rendered from September 1, 2021 to November 30, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on September 1, 3, 6, 10, 12, 13, 14, 15 and 29, 2021, October 1, 15, 16, 17, 21 and 31, 2021 and November 1, 15, 17, 20 and 23, 2021;
- Corresponding with Bennett Jones regarding the examination of Walter Thompson;
- Settling litigation against David Arsenault, a defendant, and corresponding with Bennett Jones regarding same;
- Reviewing quarterly income reporting for John and Judith Davies and corresponding with Bennett Jones regarding same;
- Reviewing a [REDACTED] and considering same with Bennett Jones;
- Reviewing a [REDACTED] prepared by Bennett Jones;
- Attending a call on November 15, 2021 with Bennett Jones to discuss next steps in the litigation;
- Preparing the interim report of the Receiver (the “Interim Report”) as required under Section 246 of the *Bankruptcy and Insolvency Act*;
- Preparing a schedule of receipts and disbursements in connection with the Interim Report;
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	2,456.30
HST		<u>319.32</u>
Total	\$	<u><u>2,775.62</u></u>

KSV Restructuring Inc.
Textbook (525 Princess Street) Inc.

Time Summary

For the period September 1, 2021 to November 30, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.50	1,125.00
Noah Goldstein	650	1.28	832.00
Other Staff and Administration		3.08	494.50
Subtotal			<u>2,451.50</u>
Out of pocket disbursements			4.80
Total Fees			<u><u>2,456.30</u></u>

**kSV advisory inc.**

150 King Street West, Suite 2308
 Toronto, Ontario, M5H 1J9
 T +1 416 932 6262
 F +1 416 932 6266
 www.ksvadvisory.com

INVOICE

Textbook (525 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

January 14, 2022

Invoice No: 2482
 HST #: 818808768RT0001

Re: Textbook (525 Princess Street) Inc. (the "Company")

For professional services rendered during December 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on December 9, 10, 13, 15, 20 and 22, 2021;
- Reviewing various letters prepared by Bennett Jones dated December 15, 2021 to various defendants in the litigation;
- Corresponding with Bennett Jones regarding a voicemail on December 21, 2021 from counsel to Mr. Thompson;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	618.50
HST		80.41
Total	\$	<u>698.91</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (525 Princess Street) Inc.
Time Summary
For the month ending December 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	0.25	187.50
Noah Goldstein	650	0.36	234.00
Other Staff and Administration		0.93	197.00
Subtotal			<u>618.50</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>618.50</u></u>

**ksv advisory inc.**

150 King Street West, Suite 2308
Toronto, Ontario, M5H 1J9
T +1 416 932 6262
F +1 416 932 6266
www.ksvadvisory.com

INVOICE

Textbook (525 Princess Street) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

February 15, 2022

Invoice No: 2519
HST #: 818808768RT0001

Re: Textbook (525 Princess Street) Inc. (the “Company”)

For professional services rendered during January 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on January 7, 10, 18, 19, 20 and 25, 2022;
- Reviewing John Davies’ quarterly income reporting received on January 4, 2022;
- Attending a call on January 17, 2022 with TYR LLP, counsel to Raj Singh, regarding Mr. Singh’s settlement and corresponding with Bennett Jones regarding same;
- Reviewing a letter from Peter Wardle, counsel to Greg Harris, dated January 18, 2022 regarding insurance coverage available for Mr. Harris, etc.;
- Reviewing a letter from Miller Thompson LLP, counsel to Walter Thompson dated January 19, 2022 regarding insurance coverage available for Mr. Thompson, etc.;
- Reviewing a letter from Bresver Grossman Chapman & Habas LLP, counsel to Bruce Stewart, dated January 25, 2022 regarding insurance coverage available for Mr. Stewart;
- Reviewing a schedule of insurance coverage available for each Defendant in the litigation;
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,668.40
HST		<u>216.89</u>
Total	\$	<u>1,885.29</u>

KSV Restructuring Inc.
Textbook (525 Princess Street) Inc.
Time Summary
For the month ending January 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.27	984.25
Noah Goldstein	675	0.77	519.75
Other Staff and Administration		0.89	164.40
Subtotal			<u>1,668.40</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,668.40</u></u>

Effective January 1, 2022, the hourly rates of Messrs. Kofman and Goldstein increased by \$25.

**ksv advisory inc.**

150 King Street West, Suite 2308
 Toronto, Ontario, M5H 1J9
 T +1 416 932 6262
 F +1 416 932 6266
 www.ksvadvisory.com

INVOICE

Textbook (525 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

March 18, 2022

Invoice No: 2553
 HST #: 818808768RT0001

Re: Textbook (525 Princess Street) Inc. (the "Company")

For professional services rendered during February 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including:
 - attending a long call on February 2nd concerning litigation strategy;
 - reviewing and commenting on February 4th on [REDACTED];
 - reviewing on February 4th a [REDACTED];
 - reviewing and commenting on February 15th on [REDACTED];
 - reviewing and commenting on [REDACTED];
- Reviewing support from John Davies for quarterly income reporting;
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release of funds held in trust;
- Reviewing a chart [REDACTED];
- Preparing the Company's monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,071.48
HST		<u>139.29</u>
Total	\$	<u>1,210.77</u>

KSV Restructuring Inc.
Textbook (525 Princess Street) Inc.
Time Summary
For the month ending February 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.975	755.63
Noah Goldstein	675	0.270	182.25
Other Staff and Administration		0.760	133.60
Subtotal			<u>1,071.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,071.48</u></u>



ksv advisory inc.
150 King Street West, Suite 2308
Toronto, Ontario, M5H 1J9
T +1 416 932 6262
F +1 416 932 6266
www.ksvadvisory.com

INVOICE

Textbook (525 Princess Street) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

April 19, 2022

Invoice No: 2599
HST #: 818808768RT0001

Re: Textbook (525 Princess Street) Inc. (the "Company")

For professional services rendered during March 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including:
 - drafting and reviewing emails concerning the litigation, including on March 3, 24, 25, 28 29 and 30, 2022;
 - reviewing and commenting on [REDACTED]
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release to KSV of funds it held as security for certain of the Company's obligations;
- Attending on March 28, 2022 a call with Grant Thornton LLP ("GT"), the Court appointed Trustee of Tier 1 Investments, to discuss the status of the litigation;
- Attending on March 30, 2022 a call with GT and Chaitons LLP, representative counsel to the investors, to discuss the status of the litigation;
- Considering with [REDACTED];
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,043.00
HST		135.59
Total	\$	<u>1,178.59</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (525 Princess Street) Inc.
Time Summary
For the month ending March 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.80	620.00
Noah Goldstein	675	0.36	243.00
Other Staff and Administration		0.99	180.00
Subtotal			<u>1,043.00</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,043.00</u></u>



ksv advisory inc.
150 King Street West, Suite 2308
Toronto, Ontario, M5H 1J9
T +1 416 932 6262
F +1 416 932 6266
www.ksvadvisory.com

INVOICE

Textbook (525 Princess Street) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

May 24, 2022

Invoice No: 2645
HST #: 818808768RT0001

Re: Textbook (525 Princess Street) Inc. (the "Company")

For professional services rendered during April 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including:
 - attending a call on April 1st concerning litigation strategy;
 - several emails on April 6th regarding [REDACTED]
 - reviewing several iterations of a [REDACTED]
- Reviewing support information from John Davies and his wife in respect of their quarterly income reporting obligations;
- Attending a call on April 19th with Bennett Jones, Aird & Berlis LLP and Grant Thornton to discuss the litigation strategy;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,218.45
HST		158.40
Total	\$	<u>1,376.85</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (525 Princess Street) Inc.
Time Summary
For the month ending April 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.65	503.75
Noah Goldstein	675	0.82	553.50
Other Staff and Administration		0.92	161.20
Subtotal			<u>1,218.45</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,218.45</u></u>



ksv advisory inc.
150 King Street West, Suite 2308
Toronto, Ontario, M5H 1J9
T +1 416 932 6262
F +1 416 932 6266
www.ksvadvisory.com

INVOICE

Textbook (525 Princess Street) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

July 18, 2022

Invoice No: 2712
HST #: 818808768RT0001

Re: Textbook (525 Princess Street) Inc. (the "Company")

For professional services rendered from May 1, 2022 to June 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- reviewing and finalizing a [REDACTED];
- reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including on June 13, 14, 15 and 29, 2022; and
 - drafting responses, including preparing several schedules;
- reviewing a [REDACTED] and considering same with Bennett Jones, including on June 16, 2022;
- preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	2,320.80
HST		301.70
Total	\$	<u>2,622.50</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (525 Princess Street) Inc.

Time Summary

For the period May 1, 2022 to June 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.19	922.25
Noah Goldstein	675	1.54	1,039.50
Other Staff and Administration		1.83	359.05
Subtotal			<u>2,320.80</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>2,320.80</u></u>



ksv advisory inc.
150 King Street West, Suite 2308
Toronto, Ontario, M5H 1J9
T +1 416 932 6262
F +1 416 932 6266
www.ksvadvisory.com

INVOICE

Textbook (525 Princess Street) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

December 22, 2022

Invoice No: 2892
HST #: 818808768RT0001

Re: Textbook (525 Princess Street) Inc. (the "Company")

For professional services rendered from July 1, 2022 to November 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver;
 - drafting responses throughout the period, including preparing several schedules;
- Reviewing John Davies' quarterly income reporting received on July 4, 2022 and corresponding with Bennett Jones re same;
- Considering [REDACTED]
- Reviewing and commenting on [REDACTED]
- Discussing the status of litigation against the remaining defendants and dealing with Bennett Jones to arrange a meeting with Grant Thornton in this regard;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	3,402.48
HST		442.32
Total	\$	<u>3,844.80</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (525 Princess Street) Inc.

Time Summary

For the period July 1, 2022 to November 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.375	1,065.63
Noah Goldstein	675	3.030	2,045.25
Other Staff and Administration		1.660	291.60
Subtotal			<u>3,402.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>3,402.48</u></u>

**kvs advisory inc.**

220 Bay St., Suite 1300 PO Box 20
 Toronto, Ontario, M5J 2SW4
 T +1 416 932 6262
 F +1 416 932 6266
 www.ksvadvisory.com

INVOICE

Textbook (525 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 220 Bay St, Suite 1300
 Toronto ON M5J 2W4

February 10, 2023

Invoice No: 2950
 HST #: 818808768RT0001

Re: Textbook (525 Princess Street) Inc. (the "Company")

For professional services rendered from December 1, 2022 to January 31, 2023 by KSV Restructuring Inc., in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- drafting [REDACTED] including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver; and
 - preparing schedules supporting the [REDACTED]
- reviewing John Davies' quarterly income reporting received on July 4, 2022;
- discussing [REDACTED] with Bennett Jones;
- discussing [REDACTED] Bennett Jones;
- attending a meeting on January 17, 2023 with Aird & Berlis LLP, Grant Thornton LLP and Bennett Jones regarding the status of litigation in these proceedings, and next steps;
- preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 4,584.25
HST	595.95
Total	<u>\$ 5,180.20</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (525 Princess Street) Inc.

Time Summary

For the Period from December 1, 2022 to January 31, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775-800	2.000	1,587.50
Noah Goldstein	675-700	2.620	1,791.00
Other Staff and Administration		3.970	1,205.75
Subtotal			<u>4,584.25</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>4,584.25</u></u>



ksv advisory inc.

220 Bay St., Suite 1300 PO Box 20
Toronto, Ontario, M5J 2SW4
T +1 416 932 6262
F +1 416 932 6266
www.ksvadvisory.com

INVOICE

Textbook (525 Princess Street) Inc.
c/o KSV Restructuring Inc.
220 Bay St, Suite 1300
Toronto ON M5J 2W4

March 17, 2023

Invoice No: 3037
HST #: 818808768RT0001

Re: Textbook (525 Princess Street) Inc. (the "Company")

For professional services rendered during February 28, 2023 in our capacity as Receiver and Manager of the Companies (the "Receiver"), including: ¹

- attending calls with Bennett Jones LLP, counsel to the Receiver, including on February 2, 2023;
- continuing to work with Bennet Jones and Aird & Berlis LLP, counsel to Grant Thornton Limited, Court-appointed Trustee in the "Textbook" proceedings;
- advancing settlement discussions with Walter Thompson, David Arsenault and Michael Cane;
- preparing Statements of Receipts and Disbursements;
- attending various internal meetings regarding the settlements;
- dealing with various administrative matters, including HST returns; and
- dealing with all other matters not specifically referenced above.

Total fees and disbursements per attached summary	\$	1,419.50
HST		184.54
Total	\$	<u>1,604.04</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (525 Princess Street) Inc.
Time Summary
For the Period Ending February 28, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	800	1.15	920.00
Noah Goldstein	700	0.36	252.00
Other Staff and Administration		0.92	247.50
Subtotal			<u>1,419.50</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,419.50</u></u>

**kvs advisory inc.**

150 King Street West, Suite 2308
 Toronto, Ontario, M5H 1J9
 T +1 416 932 6262
 F +1 416 932 6266
 ksvadvisory.com

INVOICE

Textbook (555 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto, ON M5H 1J9

June 29, 2021

Invoice No: 2238
 HST #: 818808768RT0001

Re: Textbook (555 Princess Street) Inc. (the "Company")

For professional services rendered for the period April 1, 2021 to May 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on April 7, 16, 20, 21, 22, 29 and 30, 2021 and May 3, 4, 5, 13, 17, 26, 28 and 31, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Corresponding with Bennett Jones regarding a settlement with Nancy Elliott and Elliott Law Professional Corporation and reviewing settlement documentation and correspondence regarding same (the "Elliott Settlement");
- Preparing the Receiver's Twenty First Report to Court dated May 5, 2021 in order to approve, *inter alia*, the Elliott Settlement;
- Attending at Court on May 13, 2021 in connection with the Elliott Settlement;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	3,752.00
HST		487.76
Total	\$	<u>4,239.76</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (555 Princess Street) Inc.

Time Summary

For the period from April 1, 2021 to May 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.40	1,050.00
Noah Goldstein	650	2.71	1,761.50
Other Staff and Administration		3.13	940.50
Total Fees			<u>3,752.00</u>

**INVOICE**

Textbook (555 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto, ON M5H 1J9

August 18, 2021

Invoice No: 2291
 HST #: 818808768RT0001

Re: Textbook (555 Princess Street) Inc. (the "Company")

For professional services rendered for the period June 1, 2021 to July 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on June 1, 2, 4, 5, 8, 9, 14, 16, 19, 23, 28, 29 and 30, 2021, and July 2, 3, 7, 16, 18, 19, 20, 24, 25, 26 and 28, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Attending on June 16 and 17, 2021 the discovery of Bruce Stewart;
- Attending on June 21, 2021 the discovery of David Arsenault;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Reviewing [REDACTED] and discussing same with Bennett Jones;
- Attending on July 26, 2021 the examination of John Davies;
- Preparing for an examination of the Receiver to be conducted in August 2021;
- Preparing summaries of the Stewart, Arsenault and Davies examinations;
- Preparing the Company's monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	4,374.50
HST		<u>568.69</u>
Total	\$	<u>4,943.19</u>

KSV Restructuring Inc.
Textbook (555 Princess Street) Inc.

Time Summary

For the period from June 1, 2021 to July 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	3.075	2,306.25
Noah Goldstein	650	1.500	975.00
Other Staff and Administration		3.550	1,093.25
Total Fees			<u>4,374.50</u>

**INVOICE**

Textbook (555 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto, ON M5H 1J9

September 20, 2021

Invoice No: 2334
 HST #: 818808768RT0001

Re: Textbook (555 Princess Street) Inc. (the “Company”)

For professional services rendered during August 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on August 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 16, 17, 18, 20, 25 and 27, 2021;
- Attending on August 16, 2021 at the discovery of Jonathan Krieger of Grant Thornton LLP;
- Attending on August 26, 2021 at the discovery of Gregory Harris;
- Preparing for the examination of the Receiver (Robert Kofman) to be conducted on August 19, 2021, including:
 - attending a half-day call with Bennett Jones on August 12, 2021
 - creating an index of documents relevant to the examination;
 - reviewing all Court reports issued by the Receiver;
 - reviewing transcripts from the examinations of certain defendants previously conducted, including Jon Davies, Bruce Stewart and David Arsenault;
 - reviewing historical email correspondence drafted by various of the defendants in the context of Mr. Kofman’s examination preparation;
 - preparing various analyses for use by Mr. Kofman at his examination; and
 - corresponding internally;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Attending at the cross-examination of Mr. Kofman on August 19, 2021;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Settling litigation against David Arsenaault, a defendant, and corresponding with Bennett Jones regarding same;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	7,637.50
HST		<u>992.88</u>
Total	\$	<u>8,630.38</u>

KSV Restructuring Inc.
Textbook (555 Princess Street) Inc.
Time Summary
For the month ending August 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	7.325	5,493.75
Noah Goldstein	650	2.550	1,657.50
Other Staff and Administration		1.650	486.25
Total Fees			<u>7,637.50</u>

**INVOICE**

Textbook (555 Princess Street) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto, ON M5H 1J9

December 15, 2021

Invoice No: 2442
HST #: 818808768RT0001

Re: Textbook (555 Princess Street) Inc. (the "Company")

For professional services rendered from September 1, 2021 to November 30, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on September 1, 3, 6, 10, 12, 13, 14, 15 and 29, 2021, October 1, 15, 16, 17, 21 and 31, 2021 and November 1, 15, 17, 20 and 23, 2021;
- Corresponding with Bennett Jones regarding the examination of Walter Thompson;
- Settling litigation against David Arseneault, a defendant, and corresponding with Bennett Jones regarding same;
- Reviewing quarterly income reporting for John and Judith Davies and corresponding with Bennett Jones regarding same;
- Reviewing a [REDACTED] and considering same with Bennett Jones;
- Reviewing a [REDACTED] prepared by Bennett Jones;
- Attending a call on November 15, 2021 with Bennett Jones to discuss next steps in the litigation;
- Preparing the interim report of the Receiver (the "Interim Report") as required under Section 246 of the *Bankruptcy and Insolvency Act*;
- Preparing a schedule of receipts and disbursements in connection with the Interim Report;
- Preparing the Company's monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	2,546.29
HST		<u>331.02</u>
Total	\$	<u><u>2,877.31</u></u>

KSV Restructuring Inc.
Textbook (555 Princess Street) Inc.

Time Summary

For the period September 1, 2021 to November 30, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.500	1,125.00
Noah Goldstein	650	1.280	832.00
Other Staff and Administration		3.680	584.50
Subtotal			<u>2,541.50</u>
Out of pocket disbursements			4.79
Total Fees			<u><u>2,546.29</u></u>

**ksv advisory inc.**

150 King Street West, Suite 2308
 Toronto, Ontario, M5H 1J9
 T +1 416 932 6262
 F +1 416 932 6266
 ksvadvisory.com

INVOICE

Textbook (555 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto, ON M5H 1J9

January 14, 2022

Invoice No: 2483
 HST #: 818808768RT0001

Re: Textbook (555 Princess Street) Inc. (the "Company")

For professional services rendered during December 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on December 9, 10, 13, 15, 20 and 22, 2021;
- Reviewing various letters prepared by Bennett Jones dated December 15, 2021 to various defendants in the litigation;
- Corresponding with Bennett Jones regarding a voicemail on December 21, 2021 from counsel to Mr. Thompson;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	618.50
HST		80.41
Total	\$	698.91

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (555 Princess Street) Inc.
Time Summary
For the month ending December 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	0.25	187.50
Noah Goldstein	650	0.36	234.00
Other Staff and Administration		0.93	197.00
Subtotal			<u>618.50</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>618.50</u></u>

**INVOICE**

Textbook (555 Princess Street) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto, ON M5H 1J9

February 15, 2022

Invoice No: 2520
HST #: 818808768RT0001

Re: Textbook (555 Princess Street) Inc. (the “Company”)

For professional services rendered during January 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on January 7, 10, 18, 19, 20 and 25, 2022;
- Reviewing John Davies’ quarterly income reporting received on January 4, 2022;
- Attending a call on January 17, 2022 with TYR LLP, counsel to Raj Singh, regarding Mr. Singh’s settlement and corresponding with Bennett Jones regarding same;
- Reviewing a letter from Peter Wardle, counsel to Greg Harris, dated January 18, 2022 regarding insurance coverage available for Mr. Harris, etc.;
- Reviewing a letter from Miller Thompson LLP, counsel to Walter Thompson dated January 19, 2022 regarding insurance coverage available for Mr. Thompson, etc.;
- Reviewing a letter from Bresver Grossman Chapman & Habas LLP, counsel to Bruce Stewart, dated January 25, 2022 regarding insurance coverage available for Mr. Stewart;
- Reviewing a schedule of insurance coverage available for each Defendant in the litigation;
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,668.40
HST		<u>216.89</u>
Total	\$	<u>1,885.29</u>

KSV Restructuring Inc.
Textbook (555 Princess Street) Inc.
Time Summary
For the month ending January 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.27	984.25
Noah Goldstein	675	0.77	519.75
Other Staff and Administration		0.89	164.40
Subtotal			<u>1,668.40</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,668.40</u></u>

Effective January 1, 2022, the hourly rates of Messrs. Kofman and Goldstein increased by \$25.

**INVOICE**

Textbook (555 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto, ON M5H 1J9

March 18, 2022

Invoice No: 2554
 HST #: 818808768RT0001

Re: Textbook (555 Princess Street) Inc. (the "Company")

For professional services rendered during February 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including:
 - attending a long call on February 2nd concerning litigation strategy;
 - reviewing and commenting on February 4th on [REDACTED];
 - reviewing on February 4th [REDACTED];
 - reviewing and commenting on February 15th on a [REDACTED];
 - reviewing and commenting on a [REDACTED];
- Reviewing support from John Davies for quarterly income reporting;
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release of funds held in trust;
- Reviewing a chart [REDACTED];
- Preparing the Company's monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,071.48
HST		<u>139.29</u>
Total	\$	<u>1,210.77</u>

KSV Restructuring Inc.
Textbook (555 Princess Street) Inc.
Time Summary
For the month ending February 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.975	755.63
Noah Goldstein	675	0.270	182.25
Other Staff and Administration		0.760	133.60
Subtotal			<u>1,071.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,071.48</u></u>

**ksv advisory inc.**

150 King Street West, Suite 2308
 Toronto, Ontario, M5H 1J9
 T +1 416 932 6262
 F +1 416 932 6266
 ksvadvisory.com

INVOICE

Textbook (555 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto, ON M5H 1J9

April 19, 2022

Invoice No: 2600
 HST #: 818808768RT0001

Re: Textbook (555 Princess Street) Inc. (the "Company")

For professional services rendered during March 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including:
 - drafting and reviewing emails concerning the litigation, including on March 3, 24, 25, 28 29 and 30, 2022;
 - reviewing and commenting on [REDACTED]
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release to KSV of funds it held as security for certain of the Company's obligations;
- Attending on March 28, 2022 a call with Grant Thornton LLP ("GT"), the Court appointed Trustee of Tier 1 Investments, to discuss the status of the litigation;
- Attending on March 30, 2022 a call with GT and Chaitons LLP, representative counsel to the investors, to discuss the status of the litigation;
- Considering with [REDACTED]
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 1,043.00
HST	<u>135.59</u>
Total	<u>\$ 1,178.59</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (555 Princess Street) Inc.
Time Summary
For the month ending March 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.80	620.00
Noah Goldstein	675	0.36	243.00
Other Staff and Administration		0.99	180.00
Subtotal			<u>1,043.00</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,043.00</u></u>

**INVOICE**

Textbook (555 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto, ON M5H 1J9

May 24, 2022

Invoice No: 2646
 HST #: 818808768RT0001

Re: Textbook (555 Princess Street) Inc. (the "Company")

For professional services rendered during April 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including:
 - attending a call on April 1st concerning litigation strategy;
 - several emails on April 6th regarding a [REDACTED]
 - reviewing several iterations of a [REDACTED]
- Reviewing support information from John Davies and his wife in respect of their quarterly income reporting obligations;
- Attending a call on April 19th with Bennett Jones, Aird & Berlis LLP and Grant Thornton to discuss the litigation strategy;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 1,218.45
HST	158.40
Total	<u>\$ 1,376.85</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (555 Princess Street) Inc.
Time Summary
For the month ending April 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.65	503.75
Noah Goldstein	675	0.82	553.50
Other Staff and Administration		0.92	161.20
Subtotal			<u>1,218.45</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,218.45</u></u>

**INVOICE**

Textbook (555 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto, ON M5H 1J9

July 18, 2022

Invoice No: 2713
 HST #: 818808768RT0001

Re: Textbook (555 Princess Street) Inc. (the "Company")

For professional services rendered from May 1, 2022 to June 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- reviewing and finalizing [REDACTED];
- reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including on June 13, 14, 15 and 29, 2022; and
 - drafting responses, including preparing several schedules;
- reviewing a [REDACTED] and considering same with Bennett Jones, including on June 16, 2022;
- preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 2,320.80
HST	301.70
Total	<u>\$ 2,622.50</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (555 Princess Street) Inc.

Time Summary

For the period May 1, 2022 to June 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.19	922.25
Noah Goldstein	675	1.54	1,039.50
Other Staff and Administration		1.83	359.05
Subtotal			<u>2,320.80</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>2,320.80</u></u>

**kvs advisory inc.**

150 King Street West, Suite 2308
 Toronto, Ontario, M5H 1J9
 T +1 416 932 6262
 F +1 416 932 6266
 ksvadvisory.com

INVOICE

Textbook (555 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto, ON M5H 1J9

December 22, 2022

Invoice No: 2893
 HST #: 818808768RT0001

Re: Textbook (555 Princess Street) Inc. (the "Company")

For professional services rendered from July 1, 2022 to November 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver;
 - drafting responses throughout the period, including preparing several schedules;
- Reviewing John Davies' quarterly income reporting received on July 4, 2022 and corresponding with Bennett Jones re same;
- Considering [REDACTED]
- Reviewing and commenting on draft [REDACTED]
- Discussing the status of litigation against the remaining defendants and dealing with Bennett Jones to arrange a meeting with Grant Thornton in this regard;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 3,402.48
HST	442.32
Total	\$ <u>3,844.80</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (555 Princess Street) Inc.

Time Summary

For the period July 1, 2022 to November 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.375	1,065.63
Noah Goldstein	675	3.030	2,045.25
Other Staff and Administration		1.660	291.60
Subtotal			<u>3,402.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>3,402.48</u></u>



ksv advisory inc.

220 Bay St., Suite 1300 PO Box 20
Toronto, Ontario, M5J 2SW4
T +1 416 932 6262
F +1 416 932 6266
www.ksvadvisory.com

INVOICE

Textbook (555 Princess Street) Inc.
c/o KSV Restructuring Inc.
220 Bay St, Suite 1300
Toronto ON M5J 2W4

February 10, 2023

Invoice No: 2951
HST #: 818808768RT0001

Re: Textbook (555 Princess Street) Inc. (the "Company")

For professional services rendered from December 1, 2022 to January 31, 2023 by KSV Restructuring Inc., in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- drafting [REDACTED] including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver; and
 - preparing schedules supporting the [REDACTED]
- reviewing John Davies' quarterly income reporting received on July 4, 2022;
- discussing [REDACTED] with Bennett Jones;
- discussing [REDACTED] with Bennett Jones;
- attending a meeting on January 17, 2023 with Aird & Berlis LLP, Grant Thornton LLP and Bennett Jones regarding the status of litigation in these proceedings, and next steps;
- preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	4,771.00
HST		<u>620.23</u>
Total	\$	<u>5,391.23</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (555 Princess Street) Inc.

Time Summary

For the Period from December 1, 2022 to January 31, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775-800	2.000	1,587.50
Noah Goldstein	675-700	2.620	1,791.00
Other Staff and Administration		4.520	1,392.50
Subtotal			<u>4,771.00</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>4,771.00</u></u>



ksv advisory inc.

220 Bay St., Suite 1300 PO Box 20
Toronto, Ontario, M5J 2SW4
T +1 416 932 6262
F +1 416 932 6266
www.ksvadvisory.com

INVOICE

Textbook (555 Princess Street) Inc.
c/o KSV Restructuring Inc.
220 Bay St, Suite 1300
Toronto ON M5J 2W4

March 17, 2023

Invoice No: 3038

HST #: 818808768RT0001

Re: Textbook (555 Princess Street) Inc. (the "Company")

For professional services rendered during February 28, 2023 in our capacity as Receiver and Manager of the Companies (the "Receiver"), including: ¹

- attending calls with Bennett Jones LLP, counsel to the Receiver, including on February 2, 2023;
- continuing to work with Bennet Jones and Aird & Berlis LLP, counsel to Grant Thornton Limited, Court-appointed Trustee in the "Textbook" proceedings;
- advancing settlement discussions with Walter Thompson, David Arsenault and Michael Cane;
- preparing Statements of Receipts and Disbursements;
- attending various internal meetings regarding the settlements;
- dealing with various administrative matters, including HST returns; and
- dealing with all other matters not specifically referenced above.

Total fees and disbursements per attached summary	\$	1,419.50
HST		184.54
Total	\$	<u>1,604.04</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (555 Princess Street) Inc.
Time Summary
For the Period Ending February 28, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	800	1.15	920.00
Noah Goldstein	700	0.36	252.00
Other Staff and Administration		0.92	247.50
Subtotal			<u>1,419.50</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,419.50</u></u>



INVOICE

Textbook (445 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

June 29, 2021

Invoice No: 2236
 HST #: 818808768RT0001

Re: Textbook (445 Princess Street) Inc. (the “Company”)

For professional services rendered for the period April 1, 2021 to May 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on April 7, 16, 20, 21, 22, 29 and 30, 2021 and May 3, 4, 5, 13, 17, 26, 28 and 31, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Corresponding with Bennett Jones regarding a settlement with Nancy Elliott and Elliott Law Professional Corporation and reviewing settlement documentation and correspondence regarding same (the “Elliott Settlement”);
- Preparing the Receiver’s Twenty First Report to Court dated May 5, 2021 in order to approve, *inter alia*, the Elliott Settlement;
- Attending at Court on May 13, 2021 in connection with the Elliott Settlement;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 3,802.00
HST	494.26
Total	\$ <u>4,296.26</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (445 Princess Street) Inc.

Time Summary

For the period from April 1, 2021 to May 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.40	1,050.00
Noah Goldstein	650	2.71	1,761.50
Other Staff and Administration		3.38	990.50
Total Fees			<u>3,802.00</u>



INVOICE

Textbook (445 Princess Street) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

August 18, 2021

Invoice No: 2289
HST #: 818808768RT0001

Re: Textbook (445 Princess Street) Inc. (the "Company")

For professional services rendered for the period June 1, 2021 to July 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on June 1, 2, 4, 5, 8, 9, 14, 16, 19, 23, 28, 29 and 30, 2021, and July 2, 3, 7, 16, 18, 19, 20, 24, 25, 26 and 28, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Attending on June 16 and 17, 2021 the discovery of Bruce Stewart;
- Attending on June 21, 2021 the discovery of David Arsenault;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Reviewing [REDACTED] and discussing same with Bennett Jones;
- Attending on July 26, 2021 the examination of John Davies;
- Preparing for an examination of the Receiver to be conducted in August 2021;
- Preparing summaries of the Stewart, Arsenault and Davies examinations;
- Preparing the Company's monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	4,374.50
HST		<u>568.69</u>
Total	\$	<u><u>4,943.19</u></u>

KSV Restructuring Inc.
Textbook (445 Princess Street) Inc.

Time Summary

For the period from June 1, 2021 to July 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	3.075	2,306.25
Noah Goldstein	650	1.500	975.00
Other Staff and Administration		3.550	1,093.25
Total Fees			<u>4,374.50</u>



INVOICE

Textbook (445 Princess Street) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

September 20, 2021

Invoice No: 2332
HST #: 818808768RT0001

Re: Textbook (445 Princess Street) Inc. (the "Company")

For professional services rendered during August 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on August 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 16, 17, 18, 20, 25 and 27, 2021;
- Attending on August 16, 2021 at the discovery of Jonathan Krieger of Grant Thornton LLP;
- Attending on August 26, 2021 at the discovery of Gregory Harris;
- Preparing for the examination of the Receiver (Robert Kofman) to be conducted on August 19, 2021, including:
 - attending a half-day call with Bennett Jones on August 12, 2021
 - creating an index of documents relevant to the examination;
 - reviewing all Court reports issued by the Receiver;
 - reviewing transcripts from the examinations of certain defendants previously conducted, including Jon Davies, Bruce Stewart and David Arsenault;
 - reviewing historical email correspondence drafted by various of the defendants in the context of Mr. Kofman's examination preparation;
 - preparing various analyses for use by Mr. Kofman at his examination; and
 - corresponding internally;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Attending at the cross-examination of Mr. Kofman on August 19, 2021;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Settling litigation against David Arsenault, a defendant, and corresponding with Bennett Jones regarding same;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	7,756.25
HST		<u>1,008.31</u>
Total	\$	<u><u>8,764.56</u></u>

KSV Restructuring Inc.
Textbook (445 Princess Street) Inc.
Time Summary
For the month ending August 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	7.325	5,493.75
Noah Goldstein	650	2.550	1,657.50
Other Staff and Administration		1.700	605.00
Total Fees			<u>7,756.25</u>



INVOICE

Textbook (445 Princess Street) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

December 15, 2021

Invoice No: 2440
HST #: 818808768RT0001

Re: Textbook (445 Princess Street) Inc. (the “Company”)

For professional services rendered from September 1, 2021 to November 30, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on September 1, 3, 6, 10, 12, 13, 14, 15 and 29, 2021, October 1, 15, 16, 17, 21 and 31, 2021 and November 1, 15, 17, 20 and 23, 2021;
- Corresponding with Bennett Jones regarding the examination of Walter Thompson;
- Settling litigation against David Arsenault, a defendant, and corresponding with Bennett Jones regarding same;
- Reviewing quarterly income reporting for John and Judith Davies and corresponding with Bennett Jones regarding same;
- Reviewing a [REDACTED] and considering same with Bennett Jones;
- Reviewing a [REDACTED] prepared by Bennett Jones;
- Attending a call on November 15, 2021 with Bennett Jones to discuss next steps in the litigation;
- Preparing the interim report of the Receiver (the “Interim Report”) as required under Section 246 of the *Bankruptcy and Insolvency Act*;
- Preparing a schedule of receipts and disbursements in connection with the Interim Report;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	2,381.30
HST		<u>309.57</u>
Total	\$	<u><u>2,690.87</u></u>

KSV Restructuring Inc.
Textbook (445 Princess Street) Inc.

Time Summary

For the period September 1, 2021 to November 30, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.500	1,125.00
Noah Goldstein	650	1.280	832.00
Other Staff and Administration		2.580	419.50
Subtotal			2,376.50
Out of pocket disbursements			4.80
Total Fees			2,381.30

**ksv advisory inc.**

150 King Street West, Suite 2308
 Toronto, Ontario, M5H 1J9
 T +1 416 932 6262
 F +1 416 932 6266

ksvadvisory.com

INVOICE

Textbook (445 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

January 14, 2022

Invoice No: 2481
 HST #: 818808768RT0001

Re: Textbook (445 Princess Street) Inc. (the "Company")

For professional services rendered during December 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on December 9, 10, 13, 15, 20 and 22, 2021;
- Reviewing various letters prepared by Bennett Jones dated December 15, 2021 to various defendants in the litigation;
- Corresponding with Bennett Jones regarding a voicemail on December 21, 2021 from counsel to Mr. Thompson;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	618.50
HST		80.41
Total	\$	698.91

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (445 Princess Street) Inc.
Time Summary
For the month ending December 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	0.25	187.50
Noah Goldstein	650	0.36	234.00
Other Staff and Administration		0.93	197.00
Subtotal			<u>618.50</u>
Out of pocket disbursements			-
Total Fees			<u><u>618.50</u></u>



INVOICE

Textbook (445 Princess Street) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

February 15, 2022

Invoice No: 2518
HST #: 818808768RT0001

Re: Textbook (445 Princess Street) Inc. (the "Company")

For professional services rendered during January 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on January 7, 10, 18, 19, 20 and 25, 2022;
- Reviewing John Davies' quarterly income reporting received on January 4, 2022;
- Attending a call on January 17, 2022 with TYR LLP, counsel to Raj Singh, regarding Mr. Singh's settlement and corresponding with Bennett Jones regarding same;
- Reviewing a letter from Peter Wardle, counsel to Greg Harris, dated January 18, 2022 regarding insurance coverage available for Mr. Harris, etc.;
- Reviewing a letter from Miller Thompson LLP, counsel to Walter Thompson dated January 19, 2022 regarding insurance coverage available for Mr. Thompson, etc.;
- Reviewing a letter from Bresver Grossman Chapman & Habas LLP, counsel to Bruce Stewart, dated January 25, 2022 regarding insurance coverage available for Mr. Stewart;
- Reviewing a schedule of insurance coverage available for each Defendant in the litigation;
- Preparing the Company's monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.⁹

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,668.40
HST		<u>216.89</u>
Total	\$	<u><u>1,885.29</u></u>

KSV Restructuring Inc.
Textbook (445 Princess Street) Inc.
Time Summary
For the month ending January 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.27	984.25
Noah Goldstein	675	0.77	519.75
Other Staff and Administration		0.89	164.40
Subtotal			1,668.40
Out of pocket disbursements			-
Total Fees			1,668.40

Effective January 1, 2022, the hourly rates of Messrs. Kofman and Goldstein increased by \$25.

**INVOICE**

Textbook (445 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

March 18, 2022

Invoice No: 2552
 HST #: 818808768RT0001

Re: Textbook (445 Princess Street) Inc. (the "Company")

For professional services rendered during February 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including:
 - attending a long call on February 2nd concerning litigation strategy;
 - reviewing and commenting on February 4th on [REDACTED];
 - reviewing on February 4th a [REDACTED];
 - reviewing and commenting on February 15th on [REDACTED];
 - reviewing and commenting on a [REDACTED];
- Reviewing support from John Davies for quarterly income reporting;
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release of funds held in trust;
- Reviewing a chart [REDACTED];
- Preparing the Company's monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,071.48
HST		<u>139.29</u>
Total	\$	<u><u>1,210.77</u></u>

KSV Restructuring Inc.
Textbook (445 Princess Street) Inc.
Time Summary
For the month ending February 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.975	755.63
Noah Goldstein	675	0.270	182.25
Other Staff and Administration		0.760	133.60
Subtotal			<u>1,071.48</u>
Out of pocket disbursements			-
Total Fees			<u><u>1,071.48</u></u>



INVOICE

Textbook (445 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

April 19, 2022

Invoice No: 2598
 HST #: 818808768RT0001

Re: Textbook (445 Princess Street) Inc. (the “Company”)

For professional services rendered during March 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - drafting and reviewing emails concerning the litigation, including on March 3, 24, 25, 28 29 and 30, 2022;
 - reviewing and commenting on [REDACTED]
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release to KSV of funds it held as security for certain of the Company’s obligations;
- Attending on March 28, 2022 a call with Grant Thornton LLP (“GT”), the Court appointed Trustee of Tier 1 Investments, to discuss the status of the litigation;
- Attending on March 30, 2022 a call with GT and Chaitons LLP, representative counsel to the investors, to discuss the status of the litigation;
- Considering with [REDACTED];
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 1,043.00
HST	135.59
Total	<u>\$ 1,178.59</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (445 Princess Street) Inc.
Time Summary
For the month ending March 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.80	620.00
Noah Goldstein	675	0.36	243.00
Other Staff and Administration		0.99	180.00
Subtotal			1,043.00
Out of pocket disbursements			-
Total Fees			1,043.00

**ksv advisory inc.**

150 King Street West, Suite 2308
 Toronto, Ontario, M5H 1J9
 T +1 416 932 6262
 F +1 416 932 6266

ksvadvisory.com

INVOICE

Textbook (445 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

May 24, 2022

Invoice No: 2644
 HST #: 818808768RT0001

Re: Textbook (445 Princess Street) Inc. (the "Company")

For professional services rendered during April 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including:
 - attending a call on April 1st concerning litigation strategy;
 - several emails on April 6th regarding a [REDACTED]
 - reviewing several iterations of a [REDACTED]
- Reviewing support information from John Davies and his wife in respect of their quarterly income reporting obligations;
- Attending a call on April 19th with Bennett Jones, Aird & Berlis LLP and Grant Thornton to discuss the litigation strategy;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 1,218.45
HST	158.40
Total	\$ <u>1,376.85</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (445 Princess Street) Inc.
Time Summary
For the month ending April 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.65	503.75
Noah Goldstein	675	0.82	553.50
Other Staff and Administration		0.92	161.20
Subtotal			<u>1,218.45</u>
Out of pocket disbursements			-
Total Fees			<u><u>1,218.45</u></u>

**ksv advisory inc.**

150 King Street West, Suite 2308

Toronto, Ontario, M5H 1J9

T +1 416 932 6262

F +1 416 932 6266

ksvadvisory.com

INVOICE

Textbook (445 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

July 18, 2022

Invoice No: 2711
 HST #: 818808768RT0001

Re: Textbook (445 Princess Street) Inc. (the "Company")

For professional services rendered from May 1, 2022 to June 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- reviewing and finalizing [REDACTED];
- reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including on June 13, 14, 15 and 29, 2022; and
 - drafting responses, including preparing several schedules;
- reviewing a [REDACTED] and considering same with Bennett Jones, including on June 16, 2022;
- preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 2,320.80
HST	301.70
Total	\$ <u>2,622.50</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (445 Princess Street) Inc.

Time Summary

For the period May 1, 2022 to June 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.19	922.25
Noah Goldstein	675	1.54	1,039.50
Other Staff and Administration		1.83	359.05
Subtotal			<u>2,320.80</u>
Out of pocket disbursements			-
Total Fees			<u><u>2,320.80</u></u>



INVOICE

Textbook (445 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

December 22, 2022

Invoice No: 2891
 HST #: 818808768RT0001

Re: Textbook (445 Princess Street) Inc. (the "Company")

For professional services rendered from July 1, 2022 to November 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Reviewing the [REDACTED] including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver;
 - drafting responses throughout the period, including preparing several schedules;
- Reviewing John Davies' quarterly income reporting received on July 4, 2022 and corresponding with Bennett Jones re same;
- Considering [REDACTED]
- Reviewing and commenting on [REDACTED]
- Discussing the status of litigation against the remaining defendants and dealing with Bennett Jones to arrange a meeting with Grant Thornton in this regard;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	3,362.48
HST		437.12
Total	\$	<u>3,799.60</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (445 Princess Street) Inc.

Time Summary

For the period July 1, 2022 to November 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.375	1,065.63
Noah Goldstein	675	3.030	2,045.25
Other Staff and Administration		1.460	251.60
Subtotal			<u>3,362.48</u>
Out of pocket disbursements			-
Total Fees			<u><u>3,362.48</u></u>



INVOICE

Textbook (445 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 220 Bay St., Suite 1300
 Toronto ON M5J 2W4

February 10, 2023

Invoice No: 2949
 HST #: 818808768RT0001

Re: Textbook (445 Princess Street) Inc. (the “Company”)

For professional services rendered from December 1, 2022 to January 31, 2023 by KSV Restructuring Inc., in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- drafting [REDACTED] including:
 - corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver; and
 - preparing schedules supporting the [REDACTED]
- reviewing John Davies’ quarterly income reporting received on July 4, 2022;
- discussing [REDACTED] with Bennett Jones;
- discussing [REDACTED] with Bennett Jones;
- attending a meeting on January 17, 2023 with Aird & Berlis LLP, Grant Thornton LLP and Bennett Jones regarding the status of litigation in these proceedings, and next steps;
- preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 4,584.25
HST	595.95
Total	\$ <u>5,180.20</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (445 Princess Street) Inc.

Time Summary

For the Period from December 1, 2022 to January 31, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775-800	2.000	1,587.50
Noah Goldstein	675-700	2.620	1,791.00
Other Staff and Administration		3.970	1,205.75
Subtotal			<u>4,584.25</u>
Out of pocket disbursements			-
Total Fees			<u><u>4,584.25</u></u>



INVOICE

Textbook (445 Princess Street) Inc.
 c/o KSV Restructuring Inc.
 220 Bay St., Suite 1300
 Toronto ON M5J 2W4

March 17, 2023

Invoice No: 3036
 HST #: 818808768RT0001

Re: Textbook (445 Princess Street) Inc. (the "Company")

For professional services rendered during February 28, 2023 in our capacity as Receiver and Manager of the Companies (the "Receiver"), including:¹

- attending calls with Bennett Jones LLP, counsel to the Receiver, including on February 2, 2023;
- continuing to work with Bennet Jones and Aird & Berlis LLP, counsel to Grant Thornton Limited, Court-appointed Trustee in the "Textbook" proceedings;
- advancing settlement discussions with Walter Thompson, David Arsenault and Michael Cane;
- preparing Statements of Receipts and Disbursements;
- attending various internal meetings regarding the settlements;
- dealing with various administrative matters, including HST returns; and
- dealing with all other matters not specifically referenced above.

Total fees and disbursements per attached summary	\$ 1,419.50
HST	184.54
Total	\$ <u>1,604.04</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (445 Princess Street) Inc.
Time Summary
For the Period Ending February 28, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	800	1.15	920.00
Noah Goldstein	700	0.36	252.00
Other Staff and Administration		0.92	247.50
Subtotal			<u>1,419.50</u>
Out of pocket disbursements			-
Total Fees			<u><u>1,419.50</u></u>



INVOICE

Textbook Ross Park Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

June 29, 2021

Invoice No: 2245

HST #: 818808768RT0001

Re: Textbook Ross Park Inc. (the “Company”)

For professional services rendered for the period April 1, 2021 to May 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on April 7, 16, 20, 21, 22, 29 and 30, 2021 and May 3, 4, 5, 13, 17, 26, 28 and 31, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Corresponding with Bennett Jones regarding a settlement with Nancy Elliott and Elliott Law Professional Corporation and reviewing settlement documentation and correspondence regarding same (the “Elliott Settlement”);
- Preparing the Receiver’s Twenty First Report to Court dated May 5, 2021 in order to approve, *inter alia*, the Elliott Settlement;
- Attending at Court on May 13, 2021 in connection with the Elliott Settlement;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	3,754.00
HST		488.02
Total	\$	<u>4,242.02</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook Ross Park Inc.

Time Summary

For the period from April 1, 2021 to May 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.40	1,050.00
Noah Goldstein	650	2.71	1,761.50
Other Staff and Administration		3.34	942.50
Total Fees			<u>3,754.00</u>



INVOICE

Textbook Ross Park Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

August 18, 2021

Invoice No: 2298

HST #: 818808768RT0001

Re: Textbook Ross Park Inc. (the “Company”)

For professional services rendered for the period June 1, 2021 to July 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on June 1, 2, 4, 5, 8, 9, 14, 16, 19, 23, 28, 29 and 30, 2021, and July 2, 3, 7, 16, 18, 19, 20, 24, 25, 26 and 28, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Attending on June 16 and 17, 2021 the discovery of Bruce Stewart;
- Attending on June 21, 2021 the discovery of David Arsenault;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Reviewing [REDACTED] and discussing same with Bennett Jones;
- Attending on July 26, 2021 the examination of John Davies;
- Preparing for an examination of the Receiver to be conducted in August 2021;
- Preparing summaries of the Stewart, Arsenault and Davies examinations;
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	4,374.50
HST		<u>568.69</u>
Total	\$	<u><u>4,943.19</u></u>

KSV Restructuring Inc.
Textbook Ross Park Inc.

Time Summary

For the period from June 1, 2021 to July 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	3.075	2,306.25
Noah Goldstein	650	1.500	975.00
Other Staff and Administration		3.550	1,093.25
Total Fees			<u>4,374.50</u>



INVOICE

Textbook Ross Park Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

September 20, 2021

Invoice No: 2341

HST #: 818808768RT0001

Re: Textbook Ross Park Inc. (the “Company”)

For professional services rendered during August 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on August 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 16, 17, 18, 20, 25 and 27, 2021;
- Attending on August 16, 2021 at the discovery of Jonathan Krieger of Grant Thornton LLP;
- Attending on August 26, 2021 at the discovery of Gregory Harris;
- Preparing for the examination of the Receiver (Robert Kofman) to be conducted on August 19, 2021, including:
 - attending a half-day call with Bennett Jones on August 12, 2021
 - creating an index of documents relevant to the examination;
 - reviewing all Court reports issued by the Receiver;
 - reviewing transcripts from the examinations of certain defendants previously conducted, including Jon Davies, Bruce Stewart and David Arsenault;
 - reviewing historical email correspondence drafted by various of the defendants in the context of Mr. Kofman’s examination preparation;
 - preparing various analyses for use by Mr. Kofman at his examination; and
 - corresponding internally;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Attending at the cross-examination of Mr. Kofman on August 19, 2021;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Settling litigation against David Arsenaault, a defendant, and corresponding with Bennett Jones regarding same;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	7,518.75
HST		977.44
Total	\$	<u>8,496.19</u>

KSV Restructuring Inc.
Textbook Ross Park Inc.

Time Summary

For the month ending August 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	7.325	5,493.75
Noah Goldstein	650	2.550	1,657.50
Other Staff and Administration		1.400	367.50
Total Fees			<u>7,518.75</u>



INVOICE

Textbook Ross Park Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

December 15, 2021

Invoice No: 2449

HST #: 818808768RT0001

Re: Textbook Ross Park Inc. (the "Company")

For professional services rendered from September 1, 2021 to November 30, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on September 1, 3, 6, 10, 12, 13, 14, 15 and 29, 2021, October 1, 15, 16, 17, 21 and 31, 2021 and November 1, 15, 17, 20 and 23, 2021;
- Corresponding with Bennett Jones regarding the examination of Walter Thompson;
- Settling litigation against David Arsenault, a defendant, and corresponding with Bennett Jones regarding same;
- Reviewing quarterly income reporting for John and Judith Davies and corresponding with Bennett Jones regarding same;
- Reviewing a [REDACTED] and considering same with Bennett Jones;
- Reviewing a [REDACTED] prepared by Bennett Jones;
- Attending a call on November 15, 2021 with Bennett Jones to discuss next steps in the litigation;
- Preparing the interim report of the Receiver (the "Interim Report") as required under Section 246 of the *Bankruptcy and Insolvency Act*;
- Preparing a schedule of receipts and disbursements in connection with the Interim Report;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	2,868.79
HST		<u>372.94</u>
Total	\$	<u><u>3,241.73</u></u>

KSV Restructuring Inc.
Textbook Ross Park Inc.**Time Summary**

For the period September 1, 2021 to November 30, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.50	1,125.00
Noah Goldstein	650	1.28	832.00
Other Staff and Administration		5.83	907.00
Subtotal			<u>2,864.00</u>
Out of pocket disbursements			4.79
Total Fees			<u><u>2,868.79</u></u>



ksv advisory inc.

150 King Street West, Suite 2308
Toronto, Ontario, M5H 1J9
T +1 416 932 6262
F +1 416 932 6266

www.ksvadvisory.com

INVOICE

Textbook Ross Park Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

January 14, 2022

Invoice No: 2490
HST #: 818808768RT0001

Re: Textbook Ross Park Inc. (the "Company")

For professional services rendered during December 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on December 9, 10, 13, 15, 20 and 22, 2021;
- Reviewing various letters prepared by Bennett Jones dated December 15, 2021 to various defendants in the litigation;
- Corresponding with Bennett Jones regarding a voicemail on December 21, 2021 from counsel to Mr. Thompson;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	618.50
HST		80.41
Total	\$	<u>698.91</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook Ross Park Inc.**Time Summary**

For the month ending December 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	0.25	187.50
Noah Goldstein	650	0.36	234.00
Other Staff and Administration		0.93	197.00
Subtotal			<u>618.50</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>618.50</u></u>



INVOICE

Textbook Ross Park Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

February 15, 2022

Invoice No: 2527

HST #: 818808768RT0001

Re: Textbook Ross Park Inc. (the “Company”)

For professional services rendered during January 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on January 7, 10, 18, 19, 20 and 25, 2022;
- Reviewing John Davies’ quarterly income reporting received on January 4, 2022;
- Attending a call on January 17, 2022 with TYR LLP, counsel to Raj Singh, regarding Mr. Singh’s settlement and corresponding with Bennett Jones regarding same;
- Reviewing a letter from Peter Wardle, counsel to Greg Harris, dated January 18, 2022 regarding insurance coverage available for Mr. Harris, etc.;
- Reviewing a letter from Miller Thompson LLP, counsel to Walter Thompson dated January 19, 2022 regarding insurance coverage available for Mr. Thompson, etc.;
- Reviewing a letter from Bresver Grossman Chapman & Habas LLP, counsel to Bruce Stewart, dated January 25, 2022 regarding insurance coverage available for Mr. Stewart;
- Reviewing a schedule of insurance coverage available for each Defendant in the litigation;
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,668.40
HST		<u>216.89</u>
Total	\$	<u>1,885.29</u>

KSV Restructuring Inc.
Textbook Ross Park Inc.
Time Summary
For the month ending January 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.27	984.25
Noah Goldstein	675	0.77	519.75
Other Staff and Administration		0.89	164.40
Subtotal			<u>1,668.40</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,668.40</u></u>

Effective January 1, 2022, the hourly rates of Messrs. Kofman and Goldstein increased by \$25.



INVOICE

Textbook Ross Park Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

March 18, 2022

Invoice No: 2561
HST #: 818808768RT0001

Re: Textbook Ross Park Inc. (the “Company”)

For professional services rendered during February 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - attending a long call on February 2nd concerning litigation strategy;
 - reviewing and commenting on February 4th on [REDACTED];
 - reviewing on February 4th a [REDACTED];
 - reviewing and commenting on February 15th on [REDACTED];
 - reviewing and commenting on a [REDACTED];
- Reviewing support from John Davies for quarterly income reporting;
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release of funds held in trust;
- Reviewing a chart [REDACTED];
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,071.48
HST		<u>139.29</u>
Total	\$	<u>1,210.77</u>

KSV Restructuring Inc.
Textbook Ross Park Inc.
Time Summary
For the month ending February 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.975	755.63
Noah Goldstein	675	0.270	182.25
Other Staff and Administration		0.640	133.60
Subtotal			<u>1,071.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,071.48</u></u>



INVOICE

Textbook Ross Park Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

April 19, 2022

Invoice No: 2607
 HST #: 818808768RT0001

Re: Textbook Ross Park Inc. (the “Company”)

For professional services rendered during March 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - drafting and reviewing emails concerning the litigation, including on March 3, 24, 25, 28 29 and 30, 2022;
 - reviewing and commenting on [REDACTED];
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release to KSV of funds it held as security for certain of the Company’s obligations;
- Attending on March 28, 2022 a call with Grant Thornton LLP (“GT”), the Court appointed Trustee of Tier 1 Investments, to discuss the status of the litigation;
- Attending on March 30, 2022 a call with GT and Chaitons LLP, representative counsel to the investors, to discuss the status of the litigation;
- Considering with [REDACTED];
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 1,043.00
HST	<u>135.59</u>
Total	<u>\$ 1,178.59</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook Ross Park Inc.
Time Summary
For the month ending March 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.80	620.00
Noah Goldstein	675	0.36	243.00
Other Staff and Administration		0.99	180.00
Subtotal			<u>1,043.00</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,043.00</u></u>



INVOICE

Textbook Ross Park Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

May 24, 2022

Invoice No: 2653
 HST #: 818808768RT0001

Re: Textbook Ross Park Inc. (the “Company”)

For professional services rendered during April 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - attending a call on April 1st concerning litigation strategy;
 - several emails on April 6th regarding a [REDACTED]
 - reviewing several iterations of a [REDACTED]
- Reviewing support information from John Davies and his wife in respect of their quarterly income reporting obligations;
- Attending a call on April 19th with Bennett Jones, Aird & Berlis LLP and Grant Thornton to discuss the litigation strategy;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 1,218.45
HST	158.40
Total	\$ <u>1,376.85</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook Ross Park Inc.
Time Summary
For the month ending April 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.65	503.75
Noah Goldstein	675	0.82	553.50
Other Staff and Administration		0.92	161.20
Subtotal			<u>1,218.45</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,218.45</u></u>

**ksv advisory inc.**

150 King Street West, Suite 2308

Toronto, Ontario, M5H 1J9

T +1 416 932 6262

F +1 416 932 6266

www.ksvadvisory.com

INVOICE

Textbook Ross Park Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

July 18, 2022

Invoice No: 2720

HST #: 818808768RT0001

Re: Textbook Ross Park Inc. (the "Company")

For professional services rendered from May 1, 2022 to June 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- reviewing and finalizing [REDACTED];
- reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including on June 13, 14, 15 and 29, 2022; and
 - drafting responses, including preparing several schedules;
- reviewing a [REDACTED] and considering same with Bennett Jones, including on June 16, 2022;
- preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 2,134.55
HST	277.49
Total	\$ <u>2,412.04</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook Ross Park Inc.**Time Summary**

For the period May 1, 2022 to June 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.19	922.25
Noah Goldstein	675	1.54	1,039.50
Other Staff and Administration		1.08	172.80
Subtotal			<u>2,134.55</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>2,134.55</u></u>



INVOICE

Textbook Ross Park Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

December 22, 2022

Invoice No: 2900
 HST #: 818808768RT0001

Re: Textbook Ross Park Inc. (the “Company”)

For professional services rendered from July 1, 2022 to November 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver;
 - drafting responses throughout the period, including preparing several schedules;
- Reviewing John Davies’ quarterly income reporting received on July 4, 2022 and corresponding with Bennett Jones re same;
- Considering [REDACTED]
- Reviewing and commenting on [REDACTED]
- Discussing the status of litigation against the remaining defendants and dealing with Bennett Jones to arrange a meeting with Grant Thornton in this regard;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 3,402.48
HST	442.32
Total	<u>\$ 3,844.80</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook Ross Park Inc.**Time Summary**

For the period July 1, 2022 to November 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.380	1,069.50
Noah Goldstein	675	3.030	2,045.25
Other Staff and Administration		1.660	291.60
Subtotal			<u>3,406.35</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>3,406.35</u></u>

**INVOICE**

Textbook Ross Park Inc.
c/o KSV Restructuring Inc.
220 Bay St, Suite 1300
Toronto ON M5J 2W4

February 10, 2023

Invoice No: 2958

HST #: 818808768RT0001

Re: Textbook Ross Park Inc. (the "Company")

For professional services rendered from December 1, 2022 to January 31, 2023 by KSV Restructuring Inc., in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- drafting [REDACTED] including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver; and
 - preparing schedules supporting the [REDACTED]
- reviewing John Davies' quarterly income reporting received on July 4, 2022;
- discussing [REDACTED] with Bennett Jones;
- discussing [REDACTED] with Bennett Jones;
- attending a meeting on January 17, 2023 with Aird & Berlis LLP, Grant Thornton LLP and Bennett Jones regarding the status of litigation in these proceedings, and next steps;
- preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 4,415.50
HST	574.02
Total	\$ <u>4,989.52</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook Ross Park Inc.**Time Summary**

For the Period from December 1, 2022 to January 31, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775-800	2.000	1,587.50
Noah Goldstein	675-700	2.620	1,791.00
Other Staff and Administration		3.220	1,037.00
Subtotal			<u>4,415.50</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>4,415.50</u></u>



INVOICE

Textbook Ross Park Inc.
c/o KSV Restructuring Inc.
220 Bay St, Suite 1300
Toronto ON M5J 2W4

March 17, 2023

Invoice No: 3045

HST #: 818808768RT0001

Re: Textbook Ross Park Inc. (the "Company")

For professional services rendered during February 28, 2023 in our capacity as Receiver and Manager of the Companies (the "Receiver"), including:¹

- attending calls with Bennett Jones LLP, counsel to the Receiver, including on February 2, 2023;
- continuing to work with Bennet Jones and Aird & Berlis LLP, counsel to Grant Thornton Limited, Court-appointed Trustee in the "Textbook" proceedings;
- advancing settlement discussions with Walter Thompson, David Arsenault and Michael Cane;
- preparing Statements of Receipts and Disbursements;
- attending various internal meetings regarding the settlements;
- dealing with various administrative matters, including HST returns; and
- dealing with all other matters not specifically referenced above.

Total fees and disbursements per attached summary	\$	1,419.50
HST		184.54
Total	\$	<u>1,604.04</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook Ross Park Inc.**Time Summary**

For the Period Ending February 28, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	800	1.15	920.00
Noah Goldstein	700	0.36	252.00
Other Staff and Administration		0.92	247.50
Subtotal			<u>1,419.50</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,419.50</u></u>



INVOICE

Textbook (774 Bronson Avenue) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

June 29, 2021

Invoice No: 2244

HST #: 818808768RT0001

Re: Textbook (774 Bronson Avenue) Inc. (the “Company”)

For professional services rendered for the period April 1, 2021 to May 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on April 7, 16, 20, 21, 22, 29 and 30, 2021 and May 3, 4, 5, 13, 17, 26, 28 and 31, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Corresponding with Bennett Jones regarding a settlement with Nancy Elliott and Elliott Law Professional Corporation and reviewing settlement documentation and correspondence regarding same (the “Elliott Settlement”);
- Preparing the Receiver’s Twenty First Report to Court dated May 5, 2021 in order to approve, *inter alia*, the Elliott Settlement;
- Attending at Court on May 13, 2021 in connection with the Elliott Settlement;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	3,672.00
HST		477.36
Total	\$	<u>4,149.36</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (774 Bronson Avenue) Inc.

Time Summary

For the period from April 1, 2021 to May 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.40	1,050.00
Noah Goldstein	650	2.71	1,761.50
Other Staff and Administration		2.93	860.50
Total Fees			<u>3,672.00</u>



kvs advisory inc.
150 King Street West, Suite 2308
Toronto, Ontario, M5H 1J9
T +1 416 932 6262
F +1 416 932 6266

www.ksvadvisory.com

INVOICE

Textbook (774 Bronson Avenue) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

August 18, 2021

Invoice No: 2297
HST #: 818808768RT0001

Re: Textbook (774 Bronson Avenue) Inc. (the “Company”)

For professional services rendered for the period June 1, 2021 to July 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on June 1, 2, 4, 5, 8, 9, 14, 16, 19, 23, 28, 29 and 30, 2021, and July 2, 3, 7, 16, 18, 19, 20, 24, 25, 26 and 28, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Attending on June 16 and 17, 2021 the discovery of Bruce Stewart;
- Attending on June 21, 2021 the discovery of David Arsenault;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Reviewing [REDACTED] and discussing same with Bennett Jones;
- Attending on July 26, 2021 the examination of John Davies;
- Preparing for an examination of the Receiver to be conducted in August 2021;
- Preparing summaries of the Stewart, Arsenault and Davies examinations;
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	4,374.50
HST		<u>568.69</u>
Total	\$	<u>4,943.19</u>

KSV Restructuring Inc.
Textbook (774 Bronson Avenue) Inc.

Time Summary

For the period from June 1, 2021 to July 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	3.075	2,306.25
Noah Goldstein	650	1.500	975.00
Other Staff and Administration		3.550	1,093.25
Total Fees			<u>4,374.50</u>



INVOICE

Textbook (774 Bronson Avenue) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

September 20, 2021

Invoice No: 2240

HST #: 818808768RT0001

Re: Textbook (774 Bronson Avenue) Inc. (the “Company”)

For professional services rendered during August 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on August 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 16, 17, 18, 20, 25 and 27, 2021;
- Attending on August 16, 2021 at the discovery of Jonathan Krieger of Grant Thornton LLP;
- Attending on August 26, 2021 at the discovery of Gregory Harris;
- Preparing for the examination of the Receiver (Robert Kofman) to be conducted on August 19, 2021, including:
 - attending a half-day call with Bennett Jones on August 12, 2021
 - creating an index of documents relevant to the examination;
 - reviewing all Court reports issued by the Receiver;
 - reviewing transcripts from the examinations of certain defendants previously conducted, including Jon Davies, Bruce Stewart and David Arsenault;
 - reviewing historical email correspondence drafted by various of the defendants in the context of Mr. Kofman’s examination preparation;
 - preparing various analyses for use by Mr. Kofman at his examination; and
 - corresponding internally;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Attending at the cross-examination of Mr. Kofman on August 19, 2021;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Settling litigation against David Arsenaault, a defendant, and corresponding with Bennett Jones regarding same;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	7,518.75
HST		<u>977.44</u>
Total	\$	<u>8,496.19</u>

KSV Restructuring Inc.
Textbook (774 Bronson Avenue) Inc.
Time Summary
For the month ending August 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	7.325	5,493.75
Noah Goldstein	650	2.550	1,657.50
Other Staff and Administration		1.400	367.50
Total Fees			<u>7,518.75</u>



INVOICE

Textbook (774 Bronson Avenue) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

December 15, 2021

Invoice No: 2448
 HST #: 818808768RT0001

Re: Textbook (774 Bronson Avenue) Inc. (the “Company”)

For professional services rendered from September 1, 2021 to November 30, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on September 1, 3, 6, 10, 12, 13, 14, 15 and 29, 2021, October 1, 15, 16, 17, 21 and 31, 2021 and November 1, 15, 17, 20 and 23, 2021;
- Corresponding with Bennett Jones regarding the examination of Walter Thompson;
- Settling litigation against David Arsenault, a defendant, and corresponding with Bennett Jones regarding same;
- Reviewing quarterly income reporting for John and Judith Davies and corresponding with Bennett Jones regarding same;
- Reviewing a [REDACTED] and considering same with Bennett Jones;
- Reviewing a [REDACTED] prepared by Bennett Jones;
- Attending a call on November 15, 2021 with Bennett Jones to discuss next steps in the litigation;
- Preparing the interim report of the Receiver (the “Interim Report”) as required under Section 246 of the *Bankruptcy and Insolvency Act*;
- Preparing a schedule of receipts and disbursements in connection with the Interim Report;
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	2,193.79
HST		<u>285.19</u>
Total	\$	<u><u>2,478.98</u></u>

KSV Restructuring Inc.
Textbook (774 Bronson Avenue) Inc.

Time Summary

For the period September 1, 2021 to November 30, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.50	1,125.00
Noah Goldstein	650	1.28	832.00
Other Staff and Administration		1.33	232.00
Subtotal			<u>2,189.00</u>
Out of pocket disbursements			4.79
Total Fees			<u><u>2,193.79</u></u>



INVOICE

Textbook (774 Bronson Avenue) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

January 14, 2022

Invoice No: 2489
 HST #: 818808768RT0001

Re: Textbook (774 Bronson Avenue) Inc. (the “Company”)

For professional services rendered during December 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on December 9, 10, 13, 15, 20 and 22, 2021;
- Reviewing various letters prepared by Bennett Jones dated December 15, 2021 to various defendants in the litigation;
- Corresponding with Bennett Jones regarding a voicemail on December 21, 2021 from counsel to Mr. Thompson;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	618.50
HST		80.41
Total	\$	<u>698.91</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (774 Bronson Avenue) Inc.
Time Summary
For the month ending December 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	0.25	187.50
Noah Goldstein	650	0.36	234.00
Other Staff and Administration		0.93	197.00
Subtotal			<u>618.50</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>618.50</u></u>



INVOICE

Textbook (774 Bronson Avenue) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

February 15, 2022

Invoice No: 2526

HST #: 818808768RT0001

Re: Textbook (774 Bronson Avenue) Inc. (the “Company”)

For professional services rendered during January 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on January 7, 10, 18, 19, 20 and 25, 2022;
- Reviewing John Davies’ quarterly income reporting received on January 4, 2022;
- Attending a call on January 17, 2022 with TYR LLP, counsel to Raj Singh, regarding Mr. Singh’s settlement and corresponding with Bennett Jones regarding same;
- Reviewing a letter from Peter Wardle, counsel to Greg Harris, dated January 18, 2022 regarding insurance coverage available for Mr. Harris, etc.;
- Reviewing a letter from Miller Thompson LLP, counsel to Walter Thompson dated January 19, 2022 regarding insurance coverage available for Mr. Thompson, etc.;
- Reviewing a letter from Bresver Grossman Chapman & Habas LLP, counsel to Bruce Stewart, dated January 25, 2022 regarding insurance coverage available for Mr. Stewart;
- Reviewing a schedule of insurance coverage available for each Defendant in the litigation;
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,668.40
HST		<u>216.89</u>
Total	\$	<u>1,885.29</u>

KSV Restructuring Inc.
Textbook (774 Bronson Avenue) Inc.

Time Summary

For the month ending January 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.27	984.25
Noah Goldstein	675	0.77	519.75
Other Staff and Administration		0.89	164.40
Subtotal			1,668.40
Out of pocket disbursements			-
Total Fees and Disbursements			1,668.40

Effective January 1, 2022, the hourly rates of Messrs. Kofman and Goldstein increased by \$25.



INVOICE

Textbook (774 Bronson Avenue) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

March 18, 2022

Invoice No: 2560
 HST #: 818808768RT0001

Re: Textbook (774 Bronson Avenue) Inc. (the “Company”)

For professional services rendered during February 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - attending a long call on February 2nd concerning litigation strategy;
 - reviewing and commenting on February 4th on [REDACTED];
 - reviewing on February 4th a [REDACTED];
 - reviewing and commenting on February 15th on a [REDACTED];
 - reviewing and commenting on [REDACTED];
- Reviewing support from John Davies for quarterly income reporting;
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release of funds held in trust;
- Reviewing a chart [REDACTED];
- Preparing the Company’s monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,071.48
HST		<u>139.29</u>
Total	\$	<u>1,210.77</u>

KSV Restructuring Inc.
Textbook (774 Bronson Avenue) Inc.
Time Summary
For the month ending February 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.975	755.63
Noah Goldstein	675	0.270	182.25
Other Staff and Administration		0.760	133.60
Subtotal			<u>1,071.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,071.48</u></u>



INVOICE

Textbook (774 Bronson Avenue) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

April 19, 2022

Invoice No: 2606

HST #: 818808768RT0001

Re: Textbook (774 Bronson Avenue) Inc. (the “Company”)

For professional services rendered during March 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - drafting and reviewing emails concerning the litigation, including on March 3, 24, 25, 28 29 and 30, 2022;
 - reviewing and commenting on [REDACTED];
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release to KSV of funds it held as security for certain of the Company’s obligations;
- Attending on March 28, 2022 a call with Grant Thornton LLP (“GT”), the Court appointed Trustee of Tier 1 Investments, to discuss the status of the litigation;
- Attending on March 30, 2022 a call with GT and Chaitons LLP, representative counsel to the investors, to discuss the status of the litigation;
- Considering with [REDACTED];
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 1,043.00
HST	135.59
Total	\$ <u>1,178.59</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (774 Bronson Avenue) Inc.
Time Summary
For the month ending March 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.80	620.00
Noah Goldstein	675	0.36	243.00
Other Staff and Administration		0.99	180.00
Subtotal			<u>1,043.00</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,043.00</u></u>



INVOICE

Textbook (774 Bronson Avenue) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

May 24, 2022

Invoice No: 2652
 HST #: 818808768RT0001

Re: Textbook (774 Bronson Avenue) Inc. (the “Company”)

For professional services rendered during April 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including:
 - attending a call on April 1st concerning litigation strategy;
 - several emails on April 6th regarding [REDACTED]
 - reviewing several iterations of [REDACTED]
- Reviewing support information from John Davies and his wife in respect of their quarterly income reporting obligations;
- Attending a call on April 19th with Bennett Jones, Aird & Berlis LLP and Grant Thornton to discuss the litigation strategy;
- Preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 1,218.45
HST	158.40
Total	\$ <u>1,376.85</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (774 Bronson Avenue) Inc.

Time Summary

For the month ending April 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.65	503.75
Noah Goldstein	675	0.82	553.50
Other Staff and Administration		0.92	161.20
Subtotal			<u>1,218.45</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,218.45</u></u>



INVOICE

Textbook (774 Bronson Avenue) Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

July 18, 2022

Invoice No: 2719
 HST #: 818808768RT0001

Re: Textbook (774 Bronson Avenue) Inc. (the “Company”)

For professional services rendered from May 1, 2022 to June 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- reviewing and finalizing a [REDACTED];
- reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including on June 13, 14, 15 and 29, 2022; and
 - drafting responses, including preparing several schedules;
- reviewing a [REDACTED] and considering same with Bennett Jones, including on June 16, 2022;
- preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 2,134.55
HST	277.49
Total	\$ <u>2,412.04</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (774 Bronson Avenue) Inc.
Time Summary
For the period May 1, 2022 to June 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.19	922.25
Noah Goldstein	675	1.54	1,039.50
Other Staff and Administration		1.08	172.80
Subtotal			<u>2,134.55</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>2,134.55</u></u>



INVOICE

Textbook (774 Bronson Avenue) Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

December 22, 2022

Invoice No: 2899

HST #: 818808768RT0001

Re: Textbook (774 Bronson Avenue) Inc. (the "Company")

For professional services rendered from July 1, 2022 to November 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Reviewing the [REDACTED]s, including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver;
 - drafting responses throughout the period, including preparing several schedules;
- Reviewing John Davies' quarterly income reporting received on July 4, 2022 and corresponding with Bennett Jones re same;
- Considering [REDACTED]
- Reviewing and commenting on [REDACTED]
- Discussing the status of litigation against the remaining defendants and dealing with Bennett Jones to arrange a meeting with Grant Thornton in this regard;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	3,402.48
HST		442.32
Total	\$	<u>3,844.80</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (774 Bronson Avenue) Inc.

Time Summary

For the period July 1, 2022 to November 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.375	1,065.63
Noah Goldstein	675	3.030	2,045.25
Other Staff and Administration		1.660	291.60
Subtotal			<u>3,402.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>3,402.48</u></u>



INVOICE

Textbook (774 Bronson Avenue) Inc.
 c/o KSV Restructuring Inc.
 220 Bay St, Suite 1300
 Toronto ON M5J 2W4

February 10, 2023

Invoice No: 2957
 HST #: 818808768RT0001

Re: Textbook (774 Bronson Avenue) Inc. (the “Company”)

For professional services rendered from December 1, 2022 to January 31, 2023 by KSV Restructuring Inc., in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- drafting [REDACTED] including:
 - corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver; and
 - preparing schedules supporting the [REDACTED]
- reviewing John Davies’ quarterly income reporting received on July 4, 2022;
- discussing [REDACTED] with Bennett Jones;
- discussing [REDACTED] with Bennett Jones;
- attending a meeting on January 17, 2023 with Aird & Berlis LLP, Grant Thornton LLP and Bennett Jones regarding the status of litigation in these proceedings, and next steps;
- preparing the Company’s monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 4,245.50
HST	551.92
Total	\$ <u>4,797.42</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (774 Bronson Avenue) Inc.

Time Summary

For the Period from December 1, 2022 to January 31, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775-800	2.00	1,587.50
Noah Goldstein	675-700	2.62	1,791.00
Other Staff and Administration		2.82	867.00
Subtotal			4,245.50
Out of pocket disbursements			-
Total Fees and Disbursements			4,245.50



INVOICE

Textbook (774 Bronson Avenue) Inc.
 c/o KSV Restructuring Inc.
 220 Bay St, Suite 1300
 Toronto ON M5J 2W4

March 17, 2023

Invoice No: 3044

HST #: 818808768RT0001

Re: Textbook (774 Bronson Avenue) Inc. (the "Company")

For professional services rendered during February 28, 2023 in our capacity as Receiver and Manager of the Companies (the "Receiver"), including: ¹

- attending calls with Bennett Jones LLP, counsel to the Receiver, including on February 2, 2023;
- continuing to work with Bennet Jones and Aird & Berlis LLP, counsel to Grant Thornton Limited, Court-appointed Trustee in the "Textbook" proceedings;
- advancing settlement discussions with Walter Thompson, David Arsenault and Michael Cane;
- preparing Statements of Receipts and Disbursements;
- attending various internal meetings regarding the settlements;
- dealing with various administrative matters, including HST returns; and
- dealing with all other matters not specifically referenced above.

Total fees and disbursements per attached summary	\$ 1,419.50
HST	<u>184.54</u>
Total	<u>\$ 1,604.04</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
Textbook (774 Bronson Avenue) Inc.
Time Summary
For the Period Ending February 28, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	800	1.15	920.00
Noah Goldstein	700	0.36	252.00
Other Staff and Administration		0.92	247.50
Subtotal			<u>1,419.50</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,419.50</u></u>



INVOICE

McMurray Street Investments Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

June 29, 2021

Invoice No: 2243
 HST #: 818808768RT0001

Re: McMurray Street Investments Inc. (the "Company")

For professional services rendered for the period April 1, 2021 to May 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on April 7, 16, 20, 21, 22, 29 and 30, 2021 and May 3, 4, 5, 13, 17, 26, 28 and 31, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Corresponding with Bennett Jones regarding a settlement with Nancy Elliott and Elliott Law Professional Corporation and reviewing settlement documentation and correspondence regarding same (the "Elliott Settlement");
- Preparing the Receiver's Twenty First Report to Court dated May 5, 2021 in order to approve, *inter alia*, the Elliott Settlement;
- Attending at Court on May 13, 2021 in connection with the Elliott Settlement;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 3,613.25
HST	469.72
Total	\$ <u>4,082.97</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
McMurray Street Investments Inc.

Time Summary

For the period from April 1, 2021 to May 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.40	1,050.00
Noah Goldstein	650	2.71	1,761.50
Other Staff and Administration		2.58	801.75
Total Fees			<u>3,613.25</u>



INVOICEMcMurray Street Investments Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

August 18, 2021

Invoice No: 2296
HST #: 818808768RT0001**Re: McMurray Street Investments Inc. (the "Company")**

For professional services rendered for the period June 1, 2021 to July 31, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on June 1, 2, 4, 5, 8, 9, 14, 16, 19, 23, 28, 29 and 30, 2021, and July 2, 3, 7, 16, 18, 19, 20, 24, 25, 26 and 28, 2021;
- Considering next steps in the litigation process with Bennett Jones, including issues concerning testifying in the litigation and cross examinations of various defendants in the litigation;
- Attending on June 16 and 17, 2021 the discovery of Bruce Stewart;
- Attending on June 21, 2021 the discovery of David Arsenault;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Reviewing [REDACTED] and discussing same with Bennett Jones;
- Attending on July 26, 2021 the examination of John Davies;
- Preparing for an examination of the Receiver to be conducted in August 2021;
- Preparing summaries of the Stewart, Arsenault and Davies examinations;
- Preparing the Company's monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	4,288.25
HST		<u>557.47</u>
Total	\$	<u><u>4,845.72</u></u>

KSV Restructuring Inc.
McMurray Street Investments Inc.

Time Summary

For the period from June 1, 2021 to July 31, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	3.075	2,306.25
Noah Goldstein	650	1.500	975.00
Other Staff and Administration		3.300	1,007.00
Total Fees			<u>4,288.25</u>



INVOICEMcMurray Street Investments Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

September 20, 2021

Invoice No: 2339
HST #: 818808768RT0001**Re: McMurray Street Investments Inc. (the "Company")**

For professional services rendered during August 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on August 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 16, 17, 18, 20, 25 and 27, 2021;
- Attending on August 16, 2021 at the discovery of Jonathan Krieger of Grant Thornton LLP;
- Attending on August 26, 2021 at the discovery of Gregory Harris;
- Preparing for the examination of the Receiver (Robert Kofman) to be conducted on August 19, 2021, including:
 - attending a half-day call with Bennett Jones on August 12, 2021
 - creating an index of documents relevant to the examination;
 - reviewing all Court reports issued by the Receiver;
 - reviewing transcripts from the examinations of certain defendants previously conducted, including Jon Davies, Bruce Stewart and David Arsenaault;
 - reviewing historical email correspondence drafted by various of the defendants in the context of Mr. Kofman's examination preparation;
 - preparing various analyses for use by Mr. Kofman at his examination; and
 - corresponding internally;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Attending at the cross-examination of Mr. Kofman on August 19, 2021;
- Considering [REDACTED] and discussing same with Bennett Jones;
- Settling litigation against David Arsenault, a defendant, and corresponding with Bennett Jones regarding same;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	7,468.75
HST		<u>970.94</u>
Total	\$	<u><u>8,439.69</u></u>

KSV Restructuring Inc.
McMurray Street Investments Inc.
Time Summary
For the month ending August 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	7.325	5,493.75
Noah Goldstein	650	2.550	1,657.50
Other Staff and Administration		1.150	317.50
Total Fees			<u>7,468.75</u>



INVOICE

McMurray Street Investments Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

December 15, 2021

Invoice No: 2447
 HST #: 818808768RT0001

Re: McMurray Street Investments Inc. (the “Company”)

For professional services rendered from September 1, 2021 to November 30, 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager (“Receiver”) of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP (“Bennett Jones”), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on September 1, 3, 6, 10, 12, 13, 14, 15 and 29, 2021, October 1, 15, 16, 17, 21 and 31, 2021 and November 1, 15, 17, 20 and 23, 2021;
- Corresponding with Bennett Jones regarding the examination of Walter Thompson;
- Settling litigation against David Arsenault, a defendant, and corresponding with Bennett Jones regarding same;
- Reviewing quarterly income reporting for John and Judith Davies and corresponding with Bennett Jones regarding same;
- Reviewing a [REDACTED] and considering same with Bennett Jones;
- Reviewing a [REDACTED] prepared by Bennett Jones;
- Attending a call on November 15, 2021 with Bennett Jones to discuss next steps in the litigation;
- Preparing the interim report of the Receiver (the “Interim Report”) as required under Section 246 of the *Bankruptcy and Insolvency Act*;
- Preparing a schedule of receipts and disbursements in connection with the Interim Report;

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	2,193.79
HST		<u>285.19</u>
Total	\$	<u><u>2,478.98</u></u>

KSV Restructuring Inc.
McMurray Street Investments Inc.

Time Summary

For the period September 1, 2021 to November 30, 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	1.50	1,125.00
Noah Goldstein	650	1.28	832.00
Other Staff and Administration		1.33	232.00
Subtotal			<u>2,189.00</u>
Out of pocket disbursements			4.79
Total Fees			<u><u>2,193.79</u></u>

**kvs advisory inc.**

150 King Street West, Suite 2308
 Toronto, Ontario, M5H 1J9
 T +1 416 932 6262
 F +1 416 932 6266
 www.ksvadvisory.com

INVOICE

McMurray Street Investments Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

January 14, 2022

Invoice No: 2488
 HST #: 818808768RT0001

Re: McMurray Street Investments Inc. (the "Company")

For professional services rendered during December 2021 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on December 9, 10, 13, 15, 20 and 22, 2021;
- Reviewing various letters prepared by Bennett Jones dated December 15, 2021 to various defendants in the litigation;
- Corresponding with Bennett Jones regarding a voicemail on December 21, 2021 from counsel to Mr. Thompson;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	571.00
HST		<u>74.23</u>
Total	\$	<u><u>645.23</u></u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
McMurray Street Investments Inc.
Time Summary
For the month ending December 2021

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	750	0.25	187.50
Noah Goldstein	650	0.36	234.00
Other Staff and Administration		0.83	149.50
Subtotal			<u>571.00</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>571.00</u></u>



INVOICEMcMurray Street Investments Inc.
c/o KSV Restructuring Inc.
150 King Street West, Suite 2308
Toronto ON M5H 1J9

February 15, 2022

Invoice No: 2525
HST #: 818808768RT0001**Re: McMurray Street Investments Inc. (the "Company")**

For professional services rendered during January 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including emails and telephone calls concerning litigation matters on January 7, 10, 18, 19, 20 and 25, 2022;
- Reviewing John Davies' quarterly income reporting received on January 4, 2022;
- Attending a call on January 17, 2022 with TYR LLP, counsel to Raj Singh, regarding Mr. Singh's settlement and corresponding with Bennett Jones regarding same;
- Reviewing a letter from Peter Wardle, counsel to Greg Harris, dated January 18, 2022 regarding insurance coverage available for Mr. Harris, etc.;
- Reviewing a letter from Miller Thompson LLP, counsel to Walter Thompson dated January 19, 2022 regarding insurance coverage available for Mr. Thompson, etc.;
- Reviewing a letter from Bresver Grossman Chapman & Habas LLP, counsel to Bruce Stewart, dated January 25, 2022 regarding insurance coverage available for Mr. Stewart;
- Reviewing a schedule of insurance coverage available for each Defendant in the litigation;
- Preparing the Company's monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,668.40
HST		<u>216.89</u>
Total	\$	<u><u>1,885.29</u></u>

KSV Restructuring Inc.
McMurray Street Investments Inc.
Time Summary
For the month ending January 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.27	984.25
Noah Goldstein	675	0.77	519.75
Other Staff and Administration		0.89	164.40
Subtotal			<u>1,668.40</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,668.40</u></u>

Effective January 1, 2022, the hourly rates of Messrs. Kofman and Goldstein increased by \$25.



INVOICE

McMurray Street Investments Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

March 18, 2022

Invoice No: 2559
 HST #: 818808768RT0001

Re: McMurray Street Investments Inc. (the "Company")

For professional services rendered during February 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including:
 - attending a long call on February 2nd concerning litigation strategy;
 - reviewing and commenting on February 4th on a [REDACTED];
 - reviewing on February 4th a [REDACTED];
 - reviewing and commenting on February 15th on a [REDACTED];
 - reviewing and commenting on a [REDACTED];
- Reviewing support from John Davies for quarterly income reporting;
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release of funds held in trust;
- Reviewing a chart [REDACTED];
- Preparing the Company's monthly HST return; and

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$	1,071.48
HST		<u>139.29</u>
Total	\$	<u><u>1,210.77</u></u>

KSV Restructuring Inc.
McMurray Street Investments Inc.
Time Summary
For the month ending February 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.975	755.63
Noah Goldstein	675	0.270	182.25
Other Staff and Administration		0.760	133.60
Subtotal			<u>1,071.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,071.48</u></u>



INVOICE

McMurray Street Investments Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

April 19, 2022

Invoice No: 2605
 HST #: 818808768RT0001

Re: McMurray Street Investments Inc. (the "Company")

For professional services rendered during March 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including:
 - drafting and reviewing emails concerning the litigation, including on March 3, 24, 25, 28 29 and 30, 2022;
 - reviewing and commenting on [REDACTED]
- Dealing with Trisura Guarantee Insurance Company of Canada regarding the release to KSV of funds it held as security for certain of the Company's obligations;
- Attending on March 28, 2022 a call with Grant Thornton LLP ("GT"), the Court appointed Trustee of Tier 1 Investments, to discuss the status of the litigation;
- Attending on March 30, 2022 a call with GT and Chaitons LLP, representative counsel to the investors, to discuss the status of the litigation;
- Considering with [REDACTED]
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 1,043.00
HST	<u>135.59</u>
Total	<u>\$ 1,178.59</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
McMurray Street Investments Inc.
Time Summary
For the month ending March 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.80	620.00
Noah Goldstein	675	0.36	243.00
Other Staff and Administration		0.99	180.00
Subtotal			<u>1,043.00</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,043.00</u></u>



INVOICE

McMurray Street Investments Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

May 24, 2022

Invoice No: 2651
 HST #: 818808768RT0001

Re: McMurray Street Investments Inc. (the "Company")

For professional services rendered during April 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including: ¹

- Corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including:
 - attending a call on April 1st concerning litigation strategy;
 - several emails on April 6th regarding [REDACTED]
 - reviewing several iterations of a [REDACTED]
- Reviewing support information from John Davies and his wife in respect of their quarterly income reporting obligations;
- Attending a call on April 19th with Bennett Jones, Aird & Berlis LLP and Grant Thornton to discuss the litigation strategy;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 1,218.45
HST	158.40
Total	\$ <u>1,376.85</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
McMurray Street Investments Inc.
Time Summary
For the month ending April 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	0.65	503.75
Noah Goldstein	675	0.82	553.50
Other Staff and Administration		0.92	161.20
Subtotal			<u>1,218.45</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,218.45</u></u>



INVOICE

McMurray Street Investments Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

July 18, 2022

Invoice No: 2718
 HST #: 818808768RT0001

Re: McMurray Street Investments Inc. (the "Company")

For professional services rendered from May 1, 2022 to June 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- reviewing and finalizing [REDACTED];
- reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver, including on June 13, 14, 15 and 29, 2022; and
 - drafting responses, including preparing several schedules;
- reviewing a [REDACTED] and considering same with Bennett Jones, including on June 16, 2022;
- preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 2,134.55
HST	277.49
Total	\$ <u>2,412.04</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
McMurray Street Investments Inc.

Time Summary

For the period May 1, 2022 to June 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.19	922.25
Noah Goldstein	675	1.54	1,039.50
Other Staff and Administration		1.08	172.80
Subtotal			<u>2,134.55</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>2,134.55</u></u>



INVOICE

McMurray Street Investments Inc.
 c/o KSV Restructuring Inc.
 150 King Street West, Suite 2308
 Toronto ON M5H 1J9

December 22, 2022

Invoice No: 2898
 HST #: 818808768RT0001

Re: McMurray Street Investments Inc. (the "Company")

For professional services rendered from July 1, 2022 to November 30, 2022 by KSV Restructuring Inc. in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- Reviewing the [REDACTED], including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver;
 - drafting responses throughout the period, including preparing several schedules;
- Reviewing John Davies' quarterly income reporting received on July 4, 2022 and corresponding with Bennett Jones re same;
- Considering [REDACTED]
- Reviewing and commenting on draft [REDACTED]
- Discussing the status of litigation against the remaining defendants and dealing with Bennett Jones to arrange a meeting with Grant Thornton in this regard;
- Preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 3,362.48
HST	437.12
Total	\$ <u>3,799.60</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
McMurray Street Investments Inc.

Time Summary

For the period July 1, 2022 to November 30, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775	1.375	1,065.63
Noah Goldstein	675	3.030	2,045.25
Other Staff and Administration		1.460	251.60
Subtotal			<u>3,362.48</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>3,362.48</u></u>



INVOICE

McMurray Street Investments Inc.
 c/o KSV Restructuring Inc.
 220 Bay St, Suite 1300
 Toronto ON M5J 2W4

February 10, 2023

Invoice No: 2956
 HST #: 818808768RT0001

Re: McMurray Street Investments Inc. (the "Company")

For professional services rendered from December 1, 2022 to January 31, 2023 by KSV Restructuring Inc., in its capacity as Court-appointed receiver and manager ("Receiver") of certain property of the Company, including:¹

- drafting [REDACTED] including:
 - corresponding with Bennett Jones LLP ("Bennett Jones"), legal counsel to the Receiver; and
 - preparing schedules supporting the [REDACTED]
- reviewing John Davies' quarterly income reporting received on July 4, 2022;
- discussing [REDACTED] with Bennett Jones;
- discussing [REDACTED] with Bennett Jones;
- attending a meeting on January 17, 2023 with Aird & Berlis LLP, Grant Thornton LLP and Bennett Jones regarding the status of litigation in these proceedings, and next steps;
- preparing the Company's monthly HST return; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached summary	\$ 4,197.50
HST	545.68
Total	\$ <u>4,743.18</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
McMurray Street Investments Inc.

Time Summary

For the Period from December 1, 2022 to January 31, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	775-800	2.000	1,587.50
Noah Goldstein	675-700	2.620	1,791.00
Other Staff and Administration		2.270	819.00
Subtotal			<u>4,197.50</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>4,197.50</u></u>



INVOICE

McMurray Street Investments Inc.
 c/o KSV Restructuring Inc.
 220 Bay St, Suite 1300
 Toronto ON M5J 2W4

March 17, 2023

Invoice No: 3043
 HST #: 818808768RT0001

Re: McMurray Street Investments Inc. (the "Company")

For professional services rendered during February 28, 2023 in our capacity as Receiver and Manager of the Companies (the "Receiver"), including: ¹

- attending calls with Bennett Jones LLP, counsel to the Receiver, including on February 2, 2023;
- continuing to work with Bennet Jones and Aird & Berlis LLP, counsel to Grant Thornton Limited, Court-appointed Trustee in the "Textbook" proceedings;
- advancing settlement discussions with Walter Thompson, David Arsenault and Michael Cane;
- preparing Statements of Receipts and Disbursements;
- attending various internal meetings regarding the settlements;
- dealing with various administrative matters, including HST returns; and
- dealing with all other matters not specifically referenced above.

Total fees and disbursements per attached summary	\$ 1,419.50
HST	<u>184.54</u>
Total	<u>\$ 1,604.04</u>

¹ The activities described in this section have been allocated across several entities related to the Company unless the activity related solely to the Company.

KSV Restructuring Inc.
McMurray Street Investments Inc.

Time Summary

For the Period Ending February 28, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Robert Kofman	800	1.15	920.00
Noah Goldstein	700	0.36	252.00
Other Staff and Administration		0.92	247.50
Subtotal			<u>1,419.50</u>
Out of pocket disbursements			-
Total Fees and Disbursements			<u><u>1,419.50</u></u>

THIS IS EXHIBIT "B" REFERRED TO IN THE
AFFIDAVIT OF NOAH GOLDSTEIN
SWORN BEFORE ME THIS 12th DAY OF APRIL, 2023



Catherine Anne Stuyck-Therault, a Commissioner, etc.,
Province of Ontario for KSV Advisory Inc. and
KSV Restructuring Inc.
Expires February 19, 2025

Scollard Development Corporation

Schedule of Professionals' Time and RatesFor the Period from April 1, 2021 to February 28, 2023

Personnel	Title	Hours	Billing Rate (\$ per hour)	Amount (\$)
Robert Kofman	Managing Director	22.96	750-800	17,521.50
Noah Goldstein	Managing Director	18.16	650-700	12,079.50
Other staff and administrative		20.25	125-450	5,726.20
Total fees				<u>35,327.20</u>
Total hours				61.37
Average hourly rate				\$ 575.64

Memory Care Investments (Kitchener) Ltd.

Schedule of Professionals' Time and Rates

For the Period from April 1, 2021 to February 28, 2023

Personnel	Title	Hours	Billing Rate (\$ per hour)	Amount (\$)
Robert Kofman	Managing Director	22.96	750-800	17,521.50
Noah Goldstein	Managing Director	18.17	650-700	12,086.25
Other staff and administrative		23.89	125-450	5,690.55
Total fees				<u>35,298.30</u>
Total hours				65.02
Average hourly rate				\$ 542.88

Memory Care Investments (Oakville) Ltd.

Schedule of Professionals' Time and Rates

For the Period from April 1, 2021 to February 28, 2023

Personnel	Title	Hours	Billing Rate (\$ per hour)	Amount (\$)
Robert Kofman	Managing Director	22.96	750-800	17,521.50
Noah Goldstein	Managing Director	18.17	650-700	12,086.25
Other staff and administrative		23.49	125-450	5,730.35
Total fees				<u>35,338.10</u>
Total hours				64.62
Average hourly rate				\$ 546.86

1703858 Ontario Inc.

Schedule of Professionals' Time and RatesFor the Period from April 1, 2021 to February 28, 2023

Personnel	Title	Hours	Billing Rate (\$ per hour)	Amount (\$)
Robert Kofman	Managing Director	22.96	750-800	17,521.50
Noah Goldstein	Managing Director	18.17	650-700	12,086.25
Other staff and administrative		33.49	125-450	8,952.35
Total fees				<u>38,560.10</u>
Total hours				74.62
Average hourly rate				\$ 516.75

Legacy Lane Investments Ltd.

Schedule of Professionals' Time and RatesFor the Period from April 1, 2021 to February 28, 2023

Personnel	Title	Hours	Billing Rate (\$ per hour)	Amount (\$)
Robert Kofman	Managing Director	22.96	750-800	17,521.50
Noah Goldstein	Managing Director	18.17	650-700	12,086.25
Other staff and administrative		20.97	125-450	5,405.85
Total fees				<u>35,013.60</u>
Total hours				62.10
Average hourly rate				\$ 563.83

Textbook (525 Princess Street) Inc.

Schedule of Professionals' Time and Rates

For the Period from April 1, 2021 to February 28, 2023

Personnel	Title	Hours	Billing Rate (\$ per hour)	Amount (\$)
Robert Kofman	Managing Director	22.96	750-800	17521.50
Noah Goldstein	Managing Director	18.17	650-700	12086.25
Other staff and administrative		24.28	125-450	5879.60
Total fees				<u>35,487.35</u>
Total hours				65.41
Average hourly rate				\$ 542.54

Textbook (555 Princess Street) Inc.

Schedule of Professionals' Time and RatesFor the Period from April 1, 2021 to February 28, 2023

Personnel	Title	Hours	Billing Rate (\$ per hour)	Amount (\$)
Robert Kofman	Managing Director	22.96	750-800	17,521.50
Noah Goldstein	Managing Director	18.17	650-700	12,086.25
Other staff and administrative		25.43	125-450	6,231.35
Total fees				<u>35,839.10</u>
Total hours				66.56
Average hourly rate				\$ 538.45

Textbook (445 Princess Street) Inc.

Schedule of Professionals' Time and Rates

For the Period from April 1, 2021 to February 28, 2023

Personnel	Title	Hours	Billing Rate (\$ per hour)	Amount (\$)
Robert Kofman	Managing Director	22.96	750-800	17,521.50
Noah Goldstein	Managing Director	18.17	650-700	12,086.25
Other staff and administrative		23.88	125-450	6,008.35
Total fees				<u>35,616.10</u>
Total hours				65.01
Average hourly rate				547.86

Textbook Ross Park Inc.

Schedule of Professionals' Time and RatesFor the Period from April 1, 2021 to February 28, 2023

Personnel	Title	Hours	Billing Rate (\$ per hour)	Amount (\$)
Robert Kofman	Managing Director	22.96	750-800	17,521.50
Noah Goldstein	Managing Director	18.17	650-700	12,086.25
Other staff and administrative		25.37	125-450	5,895.35
Total fees				<u>35,503.10</u>
Total hours				66.50
Average hourly rate				\$ 533.88

Textbook (774 Bronson Ave) Inc.

Schedule of Professionals' Time and Rates

For the Period from April 1, 2021 to February 28, 2023

Personnel	Title	Hours	Billing Rate (\$ per hour)	Amount (\$)
Robert Kofman	Managing Director	22.96	750-800	17521.50
Noah Goldstein	Managing Director	18.17	650-700	12086.25
Other staff and administrative		20.18	125-450	4968.35
Total fees				<u>34,576.10</u>
Total hours				61.31
Average hourly rate				\$ 563.96

McMurray Street Investments Inc.

Schedule of Professionals' Time and Rates

For the Period from April 1, 2021 to February 28, 2023

Personnel	Title	Hours	Billing Rate (\$ per hour)	Amount (\$)
Robert Kofman	Managing Director	22.96	750-800	17,521.50
Noah Goldstein	Managing Director	18.17	650-700	12,086.25
Other staff and administrative		18.48	125-450	4,637.85
Total fees				<u>34,245.60</u>
Total hours				59.61
Average hourly rate				\$ 574.49

IN THE MATTER OF THE RECEIVERSHIP OF SCOLLARD DEVELOPMENT CORPORATION, MEMORY CARE INVESTMENTS (KITCHENER) LTD., MEMORY CARE INVESTMENTS (OAKVILLE) LTD., 1703858 ONTARIO INC., LEGACY LANE INVESTMENTS LTD., TEXTBOOK (525 PRINCESS STREET) INC., AND TEXTBOOK (555 PRINCESS STREET) INC.

AND IN THE MATTER OF THE RECEIVERSHIP OF TEXTBOOK (445 PRINCESS STREET) INC.

AND IN THE MATTER OF THE RECEIVERSHIP OF TEXTBOOK ROSS PARK INC., TEXTBOOK (774 BRONSON AVENUE) INC. AND MCMURRAY STREET INVESTMENTS INC.

Court File No.: CV-17-11689-00CL
Court File No.: CV-17-589078-00CL
Court File No.: CV-16-11567-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)
Proceedings commenced in Toronto

MOTION RECORD OF THE COURT-APPOINTED RECEIVER
(VOLUME 2 OF 3)

BENNETT JONES LLP

One First Canadian Place
Suite 3400, P.O. Box 130
Toronto, Ontario M5X 1A4

Sean Zweig (LSO# 573071)

Jonathan Bell (LSO# 55457P)

Joseph N. Blinick (LSO# 64325B)

Joshua Foster (LSO# 79447K)

Lawyers for KSV Restructuring Inc., in its capacity as the Court-appointed Receiver of certain property of Scollard Development Corporation, Memory Care Investments (Kitchener) Ltd., Memory Care Investments (Oakville) Ltd., 1703858 Ontario Inc., Legacy Lane Investments Ltd., Textbook (525 Princess Street) Inc., Textbook (555 Princess Street) Inc., Textbook (445 Princess Street) Inc., Textbook (774 Bronson Avenue) Inc., Textbook Ross Park Inc. and McMurray Street Investments Inc.