

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

B E T W E E N:

KINGSETT MORTGAGE CORPORATION

Applicant

- and -

SUNRISE ACQUISITIONS (HWY 7) INC.

Respondent

**APPLICATION UNDER SUBSECTION 243(1) OF THE *BANKRUPTCY AND
INSOLVENCY ACT*, R.S.C. 1985, c. B-3, AS AMENDED, AND SECTION 101 OF THE
COURTS OF JUSTICE ACT, R.S.O. 1990, c. C.43, AS AMENDED**

RESPONDING MOTION RECORD

Date: September 16, 2022

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(Keswick) Inc., Sunrise Acquisitions (Tisdale) Inc., SH & MK Management Inc., Sunrise Acquisitions (Keswick II) Inc., Sajjad Hussain, Muzammil Kodwavi, Safana Kodwavi and Mahvesh Hussain

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Court File No. CV-21-00663051-00CL

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I N D E X

TAB	DESCRIPTION
1.	Affidavit of Muzammil Kodwavi, sworn September 16, 2022
A.	Cheques delivered in respect of Lot 47
B.	Cheques delivered in respect of Lot 48
C.	Cheques delivered in respect of Lot 50
D.	Deposit slip dated April 10, 2019
E.	Deposit slip dated May 1, 2019
F.	Deposit slip dated June 3, 2019
G.	Deposit slip dated July 8, 2019 and the general ledger statement of Sunrise confirming receipt
H.	Deposit slip dated August 1, 2019 and the general ledger statement of Sunrise confirming receipt

I.	Letter dated September 16, 2022
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TAB 1

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**AFFIDAVIT OF MUZAMMIL KODWAVI,
SWORN SEPTEMBER 16, 2022**

I, MUZAMMIL KODWAVI, of the City of Richmond Hill, in the Province of Ontario,
MAKE OATH AND SAY:

1. I am the Chief Operating Officer of the Respondent, Sunrise Acquisitions (Hwy 7) Inc. (“Sunrise”) and as such, have knowledge of the matters to which I hereinafter depose. Where I do not have such knowledge, I have identified the source of my information and verily believe that information to be true.
2. I make this affidavit in response to the Motion Record of the Court-Appointed Receiver, KSV Restructuring Inc. (the “Receiver”), dated August 5, 2022 and in particular in response to:
 - a. The First Report of the Receiver dated July 27, 2021 (the “First Report”);

- b. The Third Report of the Receiver dated October 20, 2021 (the “Third Report”);
- c. The Supplement to the Third Report of the Receiver dated February 25, 2022 (the “Third Report Supplement”); and
- d. The Second Supplement to the Third Report of the Receiver dated August 5, 2022 (the “Third Report Second Supplement”).

THE PARTIES

The Company, Principals and Spouses

3. Sunrise is part of the Sunrise Homes group of companies that carry on business as residential and commercial property developers.
4. Mr. Sajjad Hussain (“Mr. Hussain”) is my business partner in Sunrise Homes and is also an officer and director of Sunrise. Mr. Hussain has experienced significant medical issues and as such I have assumed control of the operations and management of the Sunrise Home group of companies.
5. Mr. Hussain is married to Ms. Mahvesh Hussain (“Ms. Hussain”).
6. Ms. Safana Kodwavi (“Ms. Kodwavi”) is my wife.

The Related Companies

7. Sunrise Homes Ltd. (“Sunrise Homes”) is the brand company for the Sunrise Home group of companies.
8. SH & MK Management Inc. (“Management Co”) is the management company utilized by the Sunrise Home group of companies for its development projects.
9. Sunrise Acquisitions (Keswick) Inc. (“Sunrise Keswick”) is a single-purpose entity incorporated for the development project in Keswick, Ontario and is no longer active nor does it carry on any business.

10. Sunrise Acquisitions (Unionville) Inc. (“Sunrise Unionville”) is a single-purpose entity incorporated for the development project in Unionville, Ontario and is no longer active nor does it carry on any business.
11. Sunrise Acquisitions (Burlington) Inc. (“Sunrise Burlington”) is a single-purpose entity incorporated for the development project in Burlington, Ontario and is no longer active nor does it carry on any business.
12. Sunrise Acquisitions (Bronte) Inc. (“Sunrise Bronte”) is a single-purpose entity incorporated for the development project in Bronte, Ontario and is no longer active nor does it carry on any business.
13. Sunrise Acquisitions Inc. is no longer active nor does it carry on any business.
14. Sunrise Acquisitions (Tisdale II) Inc. (“Sunrise Tisdale II”) is a single-purpose entity incorporated for the development project in Tisdale, Ontario and is no longer active nor does it carry on any business.
15. Sunrise Acquisitions (Keswick II) Inc. (“Sunrise Keswick II”) is a single-purpose entity incorporated for the development project in Keswick, Ontario and is no longer active nor does it carry on any business.
16. Sunrise Acquisitions (Tisdale) Inc. (“Sunrise Tisdale”) is a single-purpose entity incorporated for the development project in Tisdale, Ontario and is no longer active nor does it carry on any business.

THE BACKGROUND

17. In or around 2015, Sunrise commenced the development of a 52-townhouse project located in Markham, Ontario known as “Unionvillas” (the “Project”).
18. Sunrise obtained a construction loan from the Applicant, Kingsett Mortgage Corporation (“Kingsett”) which loan was secured by a first position mortgage registered against the real property on which the Project is situated.

19. Sunrise also obtained a construction loan from Sorrenti Law Professional Corporation (“Sorrenti”) which loan was secured by a second position mortgage registered against the real property on which the Project is situated.
20. The Project experienced certain delays, particularly in relation to the delays caused by the COVID-19 Pandemic. The Project also experienced increased costs due to increased material costs.
21. On May 1, 2021, Sunrise did not tender the interest payment to Kingsett and as such Kingsett rendered Sunrise in default and commenced the instant Application seeking the appointment of a Receiver.

THE APPOINTMENT OF FAAN AND THE RECEIVER

22. On September 30, 2019, pursuant to the Order of the Honourable Justice Hainey, FAAN Mortgage Administrators Inc. (“FAAN”) was appointed as trustee over all of the assets, undertakings and properties of Sorrenti.
23. On June 9, 2021, the Receiver was appointed pursuant to the Order of the Honourable Justice Wilton-Siegel. A copy of the Order dated June 9, 2021 is attached as Appendix B to the Third Report.

THE REMAINING LOTS

24. At the time of the appointment of the Receiver, all 52 townhouses units had been built and only five townhouse units, namely Lots 43, 47, 48, 49, and 50, remained to be transferred to purchasers.

Lot 43

25. The agreement of purchase and sale dated June 24, 2016 in respect of Lot 43 was terminated, repudiated, and/or disclaimed pursuant to the Order of the Honourable Justice Cavanagh dated September 13, 2021. A copy of the Order dated September 13, 2021 is attached as Appendix C to the Third Report.

The Agreements

26. Ms. Kodwavi executed three agreements of purchase and sale with Sunrise as detailed below:

- a. an agreement of purchase and sale in respect of Lot 47 dated January 25, 2017 (the “Lot 47 APS”);
- b. an agreement of purchase and sale in respect of Lot 49 dated January 25, 2017 (the “Lot 49 APS”); and
- c. an agreement of purchase sale in respect of Lot 50 dated January 25, 2017 (the “Lot 50 APS”).

27. Ms. Hussain executed an agreement of purchase and sale with Sunrise in respect of Lot 48 dated January 25, 2017 (the “Lot 48 APS”).

28. The copies of the Lot 47 APS, the Lot 48 APS, the Lot 49 APS, and the Lot 50 APS (collectively the “Remaining Lots Agreements”) are attached as Appendix D to the Third Report.

29. On or about April 8, 2019, Sunrise completed interim closing of Lots 47, 48, and 50. Sunrise granted interim occupancy of Lots 47, 49, and 50 to Ms. Kodwavi. Sunrise also granted interim occupancy of Lot 48 to Ms. Hussain.

30. For reasons unknown to me, Sunrise did not complete an interim closing on Lot 49, however Sunrise did grant interim occupancy of Lot 49 to Ms. Kodwavi.

The Occupancy Fees

Lot 47

31. The interim closing of Lot 47 was completed on April 8, 2019. On the interim closing of Lot 47, Ms. Kodwavi delivered the following cheques in respect of the occupancy fees:

- d. A bank draft in the amount of \$1,559.91 payable to Sunrise being the pro-rated amount of monthly occupancy fees from April 4, 2019 to April 30, 2019; and
- e. Cheque No. 38 in the amount of \$1,733.23 dated May 1, 2019;
- f. Cheque No. 39 in the amount of \$1,733.23 dated June 1, 2019;
- g. Cheque No. 40 in the amount of \$1,733.23 dated July 1, 2019;
- h. Cheque No. 41 in the amount of \$1,733.23 dated August 1, 2019; and
- i. Cheque No. 42 in the amount of \$1,733.23 dated September 1, 2019. Attached hereto and marked as **Exhibit "A"** is a true copy of all cheques delivered in respect of Lot 47.

Lot 48

32. The interim closing of Lot 48 was completed on April 8, 2019. On the interim closing of Lot 48, Ms. Hussain delivered the following cheques in respect of the occupancy fees:

- j. A bank draft in the amount of \$1,559.91 payable to Sunrise being the pro-rated amount of monthly occupancy fees from April 4, 2019 to April 30, 2019; and
- k. Cheque No. 97 in the amount of \$1,733.23 dated May 1, 2019;
- l. Cheque No. 98 in the amount of \$1,733.23 dated June 1, 2019;
- m. Cheque No. 99 in the amount of \$1,733.23 dated July 1, 2019; and
- n. Cheque No. 100 in the amount of \$1,733.23 dated August 1, 2019. Attached hereto and marked as **Exhibit "B"** is a true copy of all cheques delivered in respect of Lot 48.

Lot 50

33. The interim closing of Lot 50 was completed on April 8, 2019. On the interim closing of Lot 50, Ms. Kodwavi delivered the following cheques in respect of the occupancy fees:

- a. A bank draft in the amount of \$1,559.91 payable to Sunrise being the pro-rated amount of monthly occupancy fees from April 4, 2019 to April 30, 2019; and
 - b. Cheque No. 43 in the amount of \$1,733.23 dated May 1, 2019;
 - c. Cheque No. 44 in the amount of \$1,733.23 dated June 1, 2019;
 - d. Cheque No. 45 in the amount of \$1,733.23 dated July 1, 2019;
 - e. Cheque No. 46 in the amount of \$1,733.23 dated August 1, 2019; and
 - f. Cheque No. 47 in the amount of \$1,733.23 dated September 1, 2019. Attached hereto and marked as **Exhibit “C”** is a true copy of all cheques delivered in respect of Lot 50.
34. On or about April 10, 2019, Sunrise deposited into its CIBC bank account bearing account no. ending with 0612 (the “CIBC Account”) three bank drafts, each in the amount of \$1,559.91 for occupancy fees collected from Ms. Kodwavi and Ms. Hussain in respect of Lots 47, 48, and 50 for the pro-rated month of April 2019. Attached hereto and marked as **Exhibit “D”** is a true copy of the deposit slip dated April 10, 2019.
35. On or about May 1, 2019, Sunrise deposited into the CIBC Account, Cheque No. 97 in the amount of \$1,733.23, Cheque No. 38 in the amount of \$1,733.23, and Cheque No. 43 in the amount of \$1,733.23 for occupancy fees collected from Ms. Kodwavi and Ms. Hussain in respect of Lots 47, 48, and 50 for the month of May 2019. Attached hereto and marked as **Exhibit “E”** is a true copy of the deposit slip dated May 1, 2019.
36. On or about June 3, 2019, Sunrise deposited into the CIBC Account, Cheque No. 39 in the amount of \$1,733.23 and Cheque No. 44 in the amount of \$1,733.23 for occupancy fees collected from Ms. Kodwavi in respect of Lots 47 and 50 for the month of June 2019. Attached hereto and marked as **Exhibit “F”** is a true copy of the deposit slip dated June 3, 2019.
37. On or about July 8, 2019, Sunrise deposited into the CIBC Account, Cheque No. 40 in the amount of \$1,733.23 and Cheque No. 45 in the amount of \$1,733.23 for occupancy fees

collected from Ms. Kodwavi in respect of Lots 47 and 50 for the month of July 2019. Attached hereto and marked as **Exhibit “G”** is a true copy of the deposit slip dated July 8, 2019 and the general ledger statement of Sunrise confirming receipt.

38. On or about August 1, 2019, Sunrise deposited into the CIBC Account, Cheque No. 41 in the amount of \$1,733.23 and Cheque No. 46 in the amount of \$1,733.23 for occupancy fees collected from Ms. Kodwavi in respect of Lots 47 and 50 for the month of August 2019. Attached hereto and marked as **Exhibit “H”** is a true copy of the deposit slip dated August 1, 2019 and the general ledger statement of Sunrise confirming receipt.

39. At paragraphs 3.1.4 and 3.1.5 of the Third Report, the Receiver states *“The Receiver has been unable to identify any evidence in the Company’s books and records that the Occupancy Fees for the period prior to the Receivership has been paid...”*.

40. At paragraphs 3.3.2.4 of the Third Report Second Supplement, the Receiver states *“...but were not paying the contractually required occupancy fees to the Company”*.

41. The Receiver’s statements in relation to Ms. Kodwavi and Ms. Hussain not paying occupancy fees is factually incorrect. The evidence of payment of occupancy fees by Ms. Kodwavi and Ms. Hussain is included in both the general ledgers of Sunrise and also in the bank statements for the CIBC Account.

42. The Receiver has been in possession of the general ledger statements of Sunrise and the bank Statements for the CIBC account since before the preparation of the Third Report.

43. The Receiver has not diligently reviewed the general ledger statements of Sunrise nor the bank statements for the CIBC Account, otherwise the Receiver would not have made the factually incorrect statements.

The Final Closings

44. Sunrise scheduled the following final closing dates:

- a. Lot 47 – November 24, 2020;

- b. Lot 48 – November 24, 2020;
 - c. Lot 49 – November 30, 2020; and
 - d. Lot 50 – November 30, 2020.
45. Despite requests by Sunrise of Kingsett for mortgage discharge statements in relation to Lots 47, 48, 49, and 50, Kingsett refused to deliver any mortgage discharge statements on the basis that the purchase price under the Remaining Lot Agreements did not meet the minimum purchase price requirements under the commitment letter with Kingsett.
46. Thereafter, Kingsett held Sunrise in default of its obligations under the commitment letter and commenced the instant Application.

The Termination of the Remaining Lots Agreements

47. Despite delivering significant deposits under each of the Remaining Lots Agreements, the Receiver sought to disclaim the Remaining Lot Agreements and to retain the deposits paid by Ms. Kodwavi and Ms. Hussain to Sunrise under the Remaining Lots Agreements.
48. Ms. Kodwavi and Ms. Hussain consented to an order disclaiming the Remaining Lots Agreements but opposed the Receiver's relief in respect of retaining the deposits paid, totalling \$2,000,000.00 (the "Deposit Motion").
49. Pursuant to the Order of the Honourable Justice Koehnen dated October 27, 2021, the Remaining Lots Agreements were deemed to be terminated, repudiated, and/or disclaimed as of October 27, 2021. A copy of the Order dated October 27, 2021 is attached as Appendix B to the Third Report Supplement.
50. At the time responding materials were due from Ms. Kodwavi and Ms. Hussain in response to the Deposit Motion, Mr. Hussain was experiencing significant medical issues and I am advised by Ms. Hussain that she was preoccupied with tending to Mr. Hussain's medical issues and was unable to deliver her responding materials to in response to the Deposit Motion.

51. Similarly, at the time responding materials were due from Ms. Kodwavi in response to the Deposit Motion, myself and Ms. Kodwavi had travelled to Pakistan and contracted COVID-19. In addition, my mother had also contracted COVID-19 and was in a very critical state. As such and despite a request for an adjournment, the Deposit Motion was heard on March 10, 2022 and pursuant to the Order of the Honourable Justice Penny, the Receiver retained the deposits totalling \$2,000,000.00. A copy of the Order dated March 10, 2022 is attached as Appendix B of the Third Report Second Supplement.

THE PROPERTIES AND THE ENCUMBRANCES

91 Longshore Way, Whitby, Ontario

52. I am advised by Mr. Hussain and verily believe to be true that Mr. Hussain purchased 91 Longshore Way, Whitby, Ontario on October 30, 2018 for a purchase price of \$419,548. Mr. Hussain subsequently took equity out of the property by obtaining a mortgage from the Bank of Nova Scotia in the amount of \$422,500.00.

53. Thereafter, in order to provide further collateral for a lender advancing funds for a land acquisition for a development in Elmvale, Ontario, a blanket collateral mortgage was registered in favour of AFC Mortgage Administration Inc., in the amount of \$312,500 (the “AFC Blanket Mortgage”).

54. All of the mortgage transactions in respect of 91 Longshore Way, Whitby, Ontario were for legitimate purposes and not otherwise convey or over-encumbrance the property.

30 Horseshoe Drive, Whitby, Ontario

55. I am advised by Mr. Hussain and verily believe to be true that Mr. Hussain purchased 30 Horseshoe Drive, Whitby, Ontario on April 16, 2020 for \$705,000.00. Mr. Hussain obtained a mortgage to finance this purchase from the Royal Bank of Canada which mortgage was also registered on April 16, 2020. The mortgage to Royal Bank of Canada was subsequently discharged and Mr. Hussain obtained a new mortgage from the Royal Bank of Canada on January 26, 2014 in the amount of \$980,000.00.

56. The Receiver states at paragraph 3.3.2(b) that there are two mortgages in favour of the Royal Bank of Canada registered against title to 30 Horseshoe Drive, Whitby, Ontario such that there are three mortgages in total encumbering this property. This is false. In fact, the parcel abstract for the property which is attached as Appendix H to the Third Report Supplement confirms that there are presently only one mortgage registered in favour of the Royal Bank of Canada.

2600 Glengarry Rd, Unit, 9, Mississauga, Ontario

57. I am advised by Mr. Hussain and verily believe to be true that Mr. Hussain and Ms. Hussain purchased 2600 Glengarry Rd, Unit, 9, Mississauga, Ontario on February 18, 2010 for \$348,740.00. Ms. Hussain subsequently transferred title to the property to Mr. Hussain solely and on the same day, Mr. Hussain obtained a mortgage in favour of the Bank of Nova Scotia in the amount of \$560,000.00.

58. The mortgage proceeds were utilized by Mr. Hussain to finance the purchase of 91 Longshore Way, Whitby, Ontario and for renovations of his personal residence. Again, there was no impropriety with respect to obtaining the mortgage from the Bank of Nova Scotia and the funds were used for the purchase of another property and for renovations.

9 Cicada Court, Toronto, Ontario

59. I am advised by Mr. Hussain and verily believe to be true that Mr. Hussain purchased 9 Cicada Court, Toronto, Ontario on December 17, 2018 for \$1,818,000.00. In order to finance the purchase of this property, Mr. Hussain obtained a mortgage from Home Trust Company in the amount of \$995,000.00 which mortgage was registered on December 17, 2018. On February 11, 2022, a blanket mortgage was registered against this property in the amount of \$1,335,000.00 in favour of Aditcorp Holdings Inc. (the “Aditcorp Blanket Mortgage”) to provide additional security for a loan advanced in relation to the land acquisition for a development in Elmvale, Ontario.

60. The Receiver states at paragraph 3.3.2(d) that there are three mortgages registered on title to this property. This is false. In fact, the parcel abstract for the property which is attached

as Appendix H to the Third Report Supplement confirms that only two mortgages are registered against this property.

24 Sutherland Drive, Toronto, Ontario

61. I am advised by Mr. Hussain and verily believe to be true that Ms. Hussain and Mr. Hussain purchased 24 Sutherland Drive, Toronto, Ontario on September 20, 2013. On June 23, 2020, Mr. Hussain transferred title to the property solely to Ms. Hussain for estate planning purposes.

72 Grand Vellore Crescent, Woodbridge, Ontario

62. Ms. Kodwavi and I purchased 72 Grand Vellore Crescent, Woodbridge, Ontario on December 8, 2016 for \$2,130,000.00. On December 27, 2018 a mortgage in the amount of \$779,800.00 was registered in favour of Italian Canadian Savings & Credit Union Limited. On June 8, 2021 a mortgage in the amount of \$1,280,750 was registered in favour of Scucog Developments Inc. which mortgage was discharged on February 14, 2022. The Aditcorp Blanket Mortgage was also registered against this property on February 11, 2022 as additional security as required by the lender.

63. The Receiver states at paragraph 3.3.2(f) that there are three mortgages registered on title to this property. This is false. In fact, the parcel abstract for the property which is attached as Appendix H to the Third Report Supplement confirms there are only two mortgages registered on title to this property.

88 Abruzzi Court, Woodbridge, Ontario

64. Ms. Kodwavi and I purchased 88 Abruzzi Court, Woodbridge, Ontario on June 4, 2021 for \$2,980,000.00. In order to finance the purchase of this property, we obtained a first mortgage in favour of Computershare Trust Company of Canada in the amount of \$1,980,000.00 which was also registered on June 4, 2021. The AFC Blank Mortgage was also registered against title to this property as added security for the lender.

THE ADVANCES

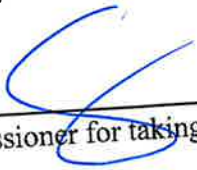
65. In order to respond to the allegations made by the Receiver in relation to intercompany advances and advances made to myself and Mr. Hussain, Sunrise retained MNP LLP (“MNP”) to conduct a review of its internally and externally prepared financial statements, general ledger statements, and bank statements for the period of 2015-2021.
66. Given the vast number of documentations under review, MNP is still currently conducting its review and preparing its report. I am advised by Mr. Howard Colton of MNP, that its report will be rendered to Sunrise by October 18, 2022. Attached hereto and marked as **Exhibit “I”** is a true copy of Mr. Colton’s letter dated September 16, 2022.
67. I request that the Court provide me with an opportunity to deliver a supplementary affidavit to be delivered by no later than October 21, 2022.
68. I make this affidavit in response to the Motion of the Receiver dated August 5, 2022 and for no other purpose.

THE EMAIL OF DECEMBER 1, 2020

69. All of the reports issued by the Receiver make reference to an allegedly altered email dated December 1, 2020 authored by Mr. Sean Stidwell (the “Email”).
70. The Receiver alleges that I altered the Email. I unequivocally deny altering the Email. I have sought clarification from Mr. Norman Winter, the recipient of the Email and am awaiting a response. I intend to address the Email in the supplementary affidavit that I intend to deliver.

SWORN REMOTELY BY Muzammil
Kodwavi of the City of Richmond Hill, in the)
Province of **ONTARIO**, before me in the)

Town of **Oakville** in the Province of)
ONTARIO on this the 16th day of)
 September, 2022, in accordance with O. Reg.)
 431/20, Administering Oath or Declaration)
 Remotely)



 Commissioner for taking Affidavits, etc.



MUZAMMIL KODWAVI

Sara Mosadeq
RAR Litigation Lawyers
LSO No.: 67864K

This is **Exhibit "A"** referred to
in the Affidavit of Muzammil Kodwavi
sworn before me, this the 16th day of September, 2022.



A Commissioner etc.

Sara Mosadeq
LSO No.: 67864K

MUZAMMIL YOUNUS KODWAVI

038

DATE 2019-05-01
Y Y Y Y M M D D

PAY TO THE ORDER OF SUNRISE ACQUISITIONS (HWY 7) INC. \$1,733.²³/₁₀₀

One thousand & seven hundred & thirty three - 23/100 DOLLARS

HSBC  **Premier**
HSBC BANK CANADA
SUITE 108, HSBC TOWER
3601 HIGHWAY #7 EAST
MARKHAM, ONTARIO L3R 0M3

MEMO _____



⑈038⑈ ⑆10482⑈0161⑈ 227605⑈150⑈

MUZAMMIL YOUNUS KODWAVI

039

DATE 2019-06-01
Y Y Y Y M M D D

PAY TO THE ORDER OF SUNRISE ACQUISITIONS (HWY 7) INC. \$1,733.²³/₁₀₀

One thousand & seven hundred & thirty three - 23/100 DOLLARS

HSBC  **Premier**
HSBC BANK CANADA
SUITE 108, HSBC TOWER
3601 HIGHWAY #7 EAST
MARKHAM, ONTARIO L3R 0M3

MEMO _____



⑈039⑈ ⑆10482⑈0161⑈ 227605⑈150⑈

MUZAMMIL YOUNUS KODWAVI

040

DATE 2019-07-01
Y Y Y Y M M D D

PAY TO THE ORDER OF SUNRISE ACQUISITIONS (HWY 7) INC. \$1,733.²³/₁₀₀

One thousand & seven hundred & thirty three - 23/100 DOLLARS

HSBC  **Premier**
HSBC BANK CANADA
SUITE 108, HSBC TOWER
3601 HIGHWAY #7 EAST
MARKHAM, ONTARIO L3R 0M3

MEMO _____



⑈040⑈ ⑆10482⑈0161⑈ 227605⑈150⑈

MUZAMMIL YOUNUS KODWAVI

041

DATE 2019-08-01
Y Y Y Y M M D D

PAY TO THE ORDER OF SUNRISE ACQUISITIONS (HWY 7) INC. \$1,733.²³/₁₀₀

One thousand & seven hundred & thirty three - 23/100 DOLLARS

HSBC  **Premier**
HSBC BANK CANADA
SUITE 108, HSBC TOWER
3601 HIGHWAY #7 EAST
MARKHAM, ONTARIO L3R 0M3

MEMO _____



⑈041⑈ ⑆10482⑈0161⑈ 227605⑈150⑈

MUZAMMIL YOUNUS KODWAVI

042

DATE 2019-09-01
Y Y Y Y M M D D

PAY TO THE ORDER OF SUNRISE ACQUISITIONS (Hwy 7) INC. \$1,733.23

One thousand & seven hundred & thirty three - 23/100

100 DOLLARS



HSBC BANK CANADA
SUITE 103, HSBC TOWER
3501 HIGHWAY 47 EAST
MARKHAM, ONTARIO L3R 0M3

Premier



Security features included. Visible on back.

MEMO

[Handwritten signature]

⑈042⑈ ⑆10482⑈0161⑆ 227605⑈150⑈

WATERMARK IN CHEQUE - HOLD UP TO LIGHT SOURCE TO VERIFY - PAPIER FILIGRANE - VISIBLE PAR EXPOSITION A LA LUMIERE

ABRAHAMS LLP
BARRISTERS and SOLICITORS
TEL: (416) 291-8786 FAX: (416) 291-8784

BANK OF MONTREAL
BRIDLEWOOD MALL BRANCH
2900 WARDEN AVENUE
TORONTO, ONTARIO M1W 2S8
TEL: 416-467-2863

T 013274

One Thousand Five Hundred Fifty Nine ***** 9 / 100

Apr/ 8/2019 \$1,559.96

PAY TO THE ORDER OF Sunrise Acquisitions (Hwy 7) Inc.

ABRAHAMS LLP
TRUST ACCOUNT

Kodwavi pur 19292-19 Lot 47

PER _____

⑈013274⑈ ⑆29792⑈001⑆ 1996⑈391 75

This is **Exhibit "B"** referred to
in the Affidavit of Muzammil Kodwavi
sworn before me, this the 16th day of September, 2022.



A Commissioner etc.

Sara Mosadeq
LSO No.: 67864K

MR SAJJAD HUSSAIN
24 SUTHERLAND DR
TORONTO ON M4G 1G8

097

DATE 20 19-05-01
Y Y Y Y M M D D

PAY TO THE ORDER OF Sunrise Acquisitions (HWY 7) Inc. \$ 1,733.23
One Thousand Seven hundred thirty three 100 DOLLARS

BMO Bank of Montreal
550 HIGHWAY #7 EAST
RICHMOND HILL, ONTARIO L4B 3Z4

MEMO: Interim Coasider Lot 48

⑈097⑈ ⑆34342⑈001⑆ 3956⑈245⑈

MR SAJJAD HUSSAIN
24 SUTHERLAND DR
TORONTO ON M4G 1G8

098

DATE 20 19-06-01
Y Y Y Y M M D D

PAY TO THE ORDER OF Sunrise Acquisitions (HWY 7) Inc. \$ 1,733.23
One Thousand Seven hundred thirty three 100 DOLLARS

BMO Bank of Montreal
550 HIGHWAY #7 EAST
RICHMOND HILL, ONTARIO L4B 3Z4

MEMO: Interim Coasider Lot 48

⑈098⑈ ⑆34342⑈001⑆ 3956⑈245⑈

MR SAJJAD HUSSAIN
24 SUTHERLAND DR
TORONTO ON M4G 1G8

099

DATE 20 19-07-01
Y Y Y Y M M D D

PAY TO THE ORDER OF Sunrise Acquisitions (HWY 7) Inc. \$ 1,733.23
One Thousand Seven hundred thirty three 100 DOLLARS

BMO Bank of Montreal
550 HIGHWAY #7 EAST
RICHMOND HILL, ONTARIO L4B 3Z4

MEMO: Interim Coasider Lot 48

⑈099⑈ ⑆34342⑈001⑆ 3956⑈245⑈

MR SAJJAD HUSSAIN
24 SUTHERLAND DR
TORONTO ON M4G 1G8

100

DATE 20 19-08-01
Y Y Y Y M M D D

PAY TO THE ORDER OF Sunrise Acquisitions (HWY 7) Inc. \$ 1,733.23
One Thousand Seven hundred thirty three 100 DOLLARS

BMO Bank of Montreal
550 HIGHWAY #7 EAST
RICHMOND HILL, ONTARIO L4B 3Z4

MEMO: Interim Coasider Lot 48

⑈100⑈ ⑆34342⑈001⑆ 3956⑈245⑈

WATERMARK IN CHEQUE - HOLD UP TO LIGHT SOURCE TO VERIFY - PAPIER FILIGRANE - VISIBLE PAR EXPOSITION A LA LUMIERE

ABRAHAMS LLP
BARRISTERS and SOLICITORS
TEL: (416) 291-8786 FAX: (416) 291-8784

BANK OF MONTREAL
BRIDLEWOOD MALL BRANCH
2000 WARDEN AVENUE
TORONTO, ONTARIO M1W 2S8
TEL: 416-497-2883



1013272
013272

One Thousand Five Hundred Fifty Nine ***** 91/100

APR 08 2019
1-2070
\$1,559.91

PAY Sunrise Acquisitions (Hwy 7) Inc.
TO THE ORDER OF



ABRAHAMS LLP
TRUST ACCOUNT

Hussain pur 19290-19

PER _____

⑈013272⑈ ⑆29792⑈001⑆ 1996⑈391⑈ 75

MR SAJJAD HUSSAIN
24 SUTHERLAND DR
TORONTO ON M4G 1G8

278

DATE 2019-09-01
Y Y Y M M D D

PAY TO THE
ORDER OF

SUNRISE Acquisitions (H2079) Inc.

\$1,733.23

One thousand seven hundred thirty three and 23/100 DOLLARS

Security features included. Details on back.

It's only money

BMO Bank of Montreal
560 HIGHWAY #7 EAST
RICHMOND HILL, ONTARIO L4B 3Z4

INTERIM - Prosac Lot 48

[Signature]

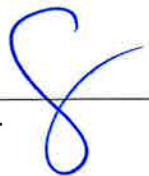
⑈ 278⑈ ⑆34342⑈001⑈

3956⑈245⑈

This is **Exhibit "C"** referred to
in the Affidavit of Muzammil Kodwavi
sworn before me, this the 16th day of September, 2022.

A Commissioner etc.

Sara Mosadeq
LSO No.: 67864K

A handwritten signature in blue ink, consisting of a large, stylized 'S' shape with a loop at the bottom.

MUZAMMIL YOUNUS KODWAVI


043

DATE 2019-05-01
Y Y Y Y M M D D

PAY TO THE ORDER OF SUNRISE ACQUISITIONS (HWY 7) INC. \$1,733.²³/₁₀₀
One thousand + seven hundred + thirty three - 23 100 DOLLARS

HSBC  **HSBC BANK CANADA**
SUITE 108, HSBC TOWER
3601 HIGHWAY #7 EAST
MARKHAM, ONTARIO L3R 0M3
Premier

MEMO _____



⑈043⑈ ⑆⑆0482⑈0⑆6⑆: 227605⑈150⑈

MUZAMMIL YOUNUS KODWAVI

044

DATE 2019-06-01
Y Y Y Y M M D D

PAY TO THE ORDER OF SUNRISE ACQUISITIONS (HWY 7) INC. \$1,733.²³/₁₀₀
One thousand + seven hundred + thirty three - 23 100 DOLLARS

HSBC  **HSBC BANK CANADA**
SUITE 108, HSBC TOWER
3601 HIGHWAY #7 EAST
MARKHAM, ONTARIO L3R 0M3
Premier

MEMO _____



⑈044⑈ ⑆⑆0482⑈0⑆6⑆: 227605⑈150⑈

MUZAMMIL YOUNUS KODWAVI

045

DATE 2019-07-01
Y Y Y Y M M D D

PAY TO THE ORDER OF SUNRISE ACQUISITIONS (HWY 7) INC. \$1,733.²³/₁₀₀
One thousand + seven hundred + thirty three - 23 100 DOLLARS

HSBC  **HSBC BANK CANADA**
SUITE 108, HSBC TOWER
3601 HIGHWAY #7 EAST
MARKHAM, ONTARIO L3R 0M3
Premier

MEMO _____



⑈045⑈ ⑆⑆0482⑈0⑆6⑆: 227605⑈150⑈

MUZAMMIL YOUNUS KODWAVI

046

DATE 2019-08-01
Y Y Y Y M M D D

PAY TO THE ORDER OF SUNRISE ACQUISITIONS (HWY 7) INC. \$1,733.²³/₁₀₀
One thousand + seven hundred + thirty three - 23 100 DOLLARS

HSBC  **HSBC BANK CANADA**
SUITE 108, HSBC TOWER
3601 HIGHWAY #7 EAST
MARKHAM, ONTARIO L3R 0M3
Premier

MEMO _____



⑈046⑈ ⑆⑆0482⑈0⑆6⑆: 227605⑈150⑈

MUZAMMIL YOUNUS KODWAVI

047

DATE 2019-09-01
Y Y Y Y M M D D

PAY TO THE ORDER OF SUNRISE ACQUISITIONS (HWY 7) INC. \$1,733.²³/₁₀₀
One thousand + seven hundred + thirty three - 23/100

HSBC  **HSBC BANK CANADA**
SUITE 108, HSBC TOWER
3601 HIGHWAY #7 EAST
MARKHAM, ONTARIO L3R0M3

Premier

MEMO _____



⑈047⑈ ⑆10482⑈0161⑆ 227605⑈150⑈

WATERMARK IN CHECKS-HOLD UP TO LIGHT SOURCE TO VERIFY- PAPIER FILIGRANE-VISIBLE PAR EXPOSITION A LA LUMIERE

ABRAHAMS LLP
BARRISTERS and SOLICITORS
TEL: (416) 291-8788 FAX: (416) 291-8784

BANK OF MONTREAL
BRIDLEWOOD MALL BRANCH
2900 WARDEN AVENUE
TORONTO, ONTARIO M1W 2S8
TEL: 416-497-2863

BMO Bank of Montreal
2900 Warden Ave
Scarborough, ON
APR 08 2019
1-2979
Certified

1013273
13273

One Thousand Five Hundred Fifty Nine ***** 91 100

Apr/ 8/ 2019

PAY TO THE ORDER OF Sunrise Acquisitions (Hwy 7), Inc.
CAD 1,733.23



ABRAHAMS LLP
TRUST ACCOUNT

Kodwavi pur 19291-19 (Lot 50)

PER _____

⑈013273⑈ ⑆29792⑈001⑆ 1996⑈391⑆ 75

This is **Exhibit "D"** referred to
in the Affidavit of Muzammil Kodwavi
sworn before me, this the 16th day of September, 2022.

A Commissioner etc.

Sara Mosadeq
LSO No.: 67864K

08642-010 2060612

ENTERED

CANADIAN IMPERIAL BANK OF COMMERCE
300 WEST BEAVER CREEK
RICHMOND HILL, ONTARIO L4B 3B1

SUNRISE ACQUISITIONS (HWY 7) INC.

08642 010 2060612

DEPOSITED BY
NAME SIGNATURE

DATE MONTH YEAR
10 4 19

CASH COUNT

X5
X10
X20
X50
X100

TOTAL # OF BILLS
X \$1 COIN
X \$2 COIN
OTHER COIN LOOSE

08642-010 5

DEPOSIT VOUCHER TOTAL

APR 10 2019

300 WEST BEAVER CREEK RD
RICHMOND HILL, ONTARIO

CHEQUE NUMBER 08642-010

TOTAL # OF CHEQUES

CHEQUE SUBTOTAL

DEPOSIT TOTAL \$

104679.73

104679.73

104679.73

104679.73

104679.73

104679.73

104679.73

104679.73

104679.73

104679.73

104679.73

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104679.73

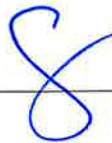
104679.73

C - DRAFTS

This is **Exhibit "E"** referred to
in the Affidavit of Muzammil Kodwavi
sworn before me, this the 16th day of September, 2022.

A Commissioner etc.

Sara Mosadeq
LSO No.: 67864K

A handwritten signature in blue ink, consisting of a stylized 'S' shape with a loop at the top and a tail that curves back to the start.

This is **Exhibit "F"** referred to
in the Affidavit of Muzammil Kodwavi
sworn before me, this the 16th day of September, 2022.

A Commissioner etc.

Sara Mosadeq
LSO No.: 67864K

SUNRISE ACQUISITIONS (HWY 7) INC.

08642 010 2060612

DEPOSITED BY
NAME/SIGNATURE

DATE MONTH YEAR
3 0 19

LIST OF CHEQUES
PLEASE LIST FOREIGN CHEQUES ON SEPARATE DEPOSIT SLIP

CHEQUE IDENTIFICATION

- 1 10218 - ch 119
- 2 10219 - ch 129
- 3 10220 - ch 36
- 4 10225 - ch 14
- 5 10224 - ch 60
- 6 10225 - ch 46
- 7 10246 - ch 130
- 8 10247 - ch 29 B
- 9 10250 - ch 44 B
- 10 10251 - ch 19
- 11 10252 - ch 105
- 12 10223 - ch 26
- 13
- 14
- 15
- 16
- 17

- 3045.55
- 3716.13
- 3205.21
- 3701.27
- 3205.21
- 3027.89
- 2901.96
- 1733.23
- 1733.23
- 4104.11
- 3780.07
- 3947.78

CASH COUNT

X5
X10
X20
X50
X100

ENTERED

TOTAL # OF BILLS
X \$ 1 COIN
X \$ 2 COIN
OTHER COIN LOOSE

OTHER CONTROLLED
08642-010

CASH SUBTOTAL

DEPOSIT
ENTER CREDIT CARD
VOUCHER TOTAL

CASH SUBTOTAL

CHEQUE SUBTOTAL

300 WEST BEAVER CREEK RD
RICHMOND HILL, ONTARIO

08642-010

JUN 03 2019

3

U.S. CASH
RATE
U.S. CHQS.
RATE

CHEQUE DEPOSIT TOTAL \$

CHEQUE SUBTOTAL \$

TOTAL # OF CHEQUES

38901.64 ✓
30901.64

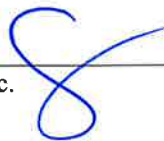
B =

08642 010 2060612

This is **Exhibit "G"** referred to
in the Affidavit of Muzammil Kodwavi
sworn before me, this the 16th day of September, 2022.

A Commissioner etc.

Sara Mosadeq
LSO No.: 67864K



SUNRISE ACQUISITIONS (HWY 7) INC.

08642 010 2060612

DATE DAY MONTH YEAR
8 7 19

LIST OF CHEQUES

PLEASE LIST FOREIGN CHEQUES ON SEPARATE DEPOSIT SLIP

CHEQUE IDENTIFICATION

- 1 1032276-12
- 2 20000-16-144
- 3 20000-16-144
- 4 290196
- 5 112222
- 6 172222
- 7 211011
- 8 278067



DATE DAY MONTH YEAR DEPOSITED BY NAME/SIGNATURE

CASH COUNT

- X5
- X10
- X20
- X50
- X100

TOTAL # OF BILLS
X \$1 COIN
X \$2 COIN

OTHER COIN LOOSE
OTHER COIN ROLLED

08642-010 CASH SUBTOTAL 5
DEPOSIT
JUL 08 2019
300 WEST BEAVER CREEK RD
RICHMOND HILL, ONTARIO
SUB 08642-010

U.S. CASH

RATE

U.S. CHGS.

RATE

CHEQUE SUBTOTAL \$
DEPOSIT TOTAL \$

21115.91

21115.91 ✓

D

CHEQUE SUBTOTAL \$

TOTAL # OF CHEQUES 88

2060612 08642 010

Sunrise Acquisitions (Hwy 7) Inc
Transactions by Account
As of 31 August 2022

2:26 PM
 2022-09-15
 Accrual Basis

Type	Date	Num	Memo	Split	Amount	Balance
26300 - Pre Occupancy Rental						
General Jou...	2018-12-18	561	Lot 25	CIBC	2,984.90	0.00
General Jou...	2018-12-21	567	Lot 19	CIBC	1,558.38	4,543.28
General Jou...	2018-12-21	568	Lot 21	CIBC	23,542.20	28,085.48
General Jou...	2018-12-21	568	Lot 21	CIBC	1,518.85	29,604.33
General Jou...	2018-12-31	672	YE entry	Work in Progress	-29,604.33	0.00
General Jou...	2019-01-02	572	Lot 25	CIBC	3,701.27	3,701.27
General Jou...	2019-01-02	572	Lot 19	CIBC	3,716.13	7,417.40
General Jou...	2019-01-02	712	Lot 18	Work in Progress	29,604.33	37,021.73
General Jou...	2019-01-09	573	Lot 24	CIBC	3,045.55	40,067.28
General Jou...	2019-01-09	573	Lot 24	CIBC	3,205.21	43,272.49
General Jou...	2019-01-18	574	Lot23-ch 27	CIBC	2,037.56	45,310.05
General Jou...	2019-02-01	576	Lot 25-ch 16	CIBC	3,701.27	49,011.32
General Jou...	2019-02-01	576	Lot 24 ch 32	CIBC	3,205.21	52,216.53
General Jou...	2019-02-01	576	Lot 19 ch 135	CIBC	3,716.13	55,932.66
General Jou...	2019-02-01	576	Lot 18 ch 45	CIBC	3,045.55	58,978.21
General Jou...	2019-02-01	576	Lot 23 ch 22	CIBC	3,947.78	62,925.99
General Jou...	2019-02-19	591	IOT 45-CH 203312	CIBC	2,050.66	64,976.65
General Jou...	2019-03-01	601	Lot 44	CIBC	26,438.92	91,415.57
General Jou...	2019-03-01	602	Lot 44	CIBC	5,423.29	96,838.86
General Jou...	2019-03-12	599	Yuan ch 128-lot46	CIBC	2,481.45	99,320.31
General Jou...	2019-03-20	607		CIBC	1,216.95	100,537.26
General Jou...	2019-04-01	620		CIBC	35,435.18	135,972.44
General Jou...	2019-04-10	624		CIBC	4,679.73	140,652.17
General Jou...	2019-05-01	633	Lot 22 Draft 88568606	CIBC	40,634.87	181,287.04
General Jou...	2019-05-03	651	Occupancy rent	CIBC	-1,733.23	179,553.81
General Jou...	2019-06-03	648	Sajjad ch Rtn	CIBC	38,901.64	218,455.45
General Jou...	2019-06-07	664	occupancy rental	CIBC	2,712.85	221,168.30
General Jou...	2019-07-08	676	Lot 22-och 12	CIBC	3,130.21	224,298.51
General Jou...	2019-07-08	676	lot 22 ch 13	CIBC	3,205.21	227,503.72
General Jou...	2019-07-08	676	lot 44 ch 44	CIBC	3,827.89	231,331.61
General Jou...	2019-07-08	676	lot 45 ch 42	CIBC	2,901.96	234,233.57
General Jou...	2019-07-08	676	lot 46 ch 131	CIBC	1,733.23	235,966.80
General Jou...	2019-07-08	676	lot 47 ch 40	CIBC	1,733.23	237,700.03
General Jou...	2019-07-08	676	lot 50 ch 45	CIBC	4,104.11	241,804.14
General Jou...	2019-07-08	676	lot 51 ch 20	CIBC	3,780.07	245,584.21
General Jou...	2019-08-01	697	lot 52 ch 106	CIBC	1,733.23	247,317.44
General Jou...	2019-08-01	697	mk-ch 046	CIBC	1,733.23	249,050.67
General Jou...	2019-08-01	697	mk-ch 041	CIBC	2,901.96	251,952.63
General Jou...	2019-08-01	697	lot 46-ch133	CIBC	3,205.21	255,157.84
General Jou...	2019-08-01	697	lot 44 ch 043	CIBC	3,130.21	258,288.05
General Jou...	2019-08-01	697	lot 22 ch 15	CIBC	-3,205.21	255,082.84
General Jou...	2019-08-06	708	RTD ch deposit	CIBC	3,130.21	258,213.05
General Jou...	2019-09-03	702	lot 22-ch 16	CIBC	7,560.14	265,773.19
General Jou...	2019-09-04	703	lot 52-	CIBC	3,701.27	269,474.46
General Jou...	2019-09-04	703	lot 25	CIBC	3,701.27	273,175.73
General Jou...	2019-09-04	703	lot 25	CIBC	3,701.27	276,877.00
General Jou...	2019-09-04	710	lot 23	CIBC	11,843.34	288,720.34
General Jou...	2019-09-06	710	lot 24	CIBC	9,615.63	298,335.97

C Lot 22 Draft 88568606

A Occupancy rent

B Sajjad ch Rtn

D lot 50 ch 45

E mk-ch 046

Sunrise Acquisitions (Hwy 7) Inc
Transactions by Account
As of 31 August 2022

2:26 PM

2022-09-15

Accrual Basis

Type	Date	Num	Memo	Split	Amount	Balance
General Jou...	2019-09-06	710	lot 19	CIBC	11,148.39	309,484.36
General Jou...	2019-09-09	711	lot 18-ch54	CIBC	9,136.65	318,621.01
General Jou...	2019-09-11	713	lot 51-ch22	CIBC	8,208.22	326,829.23
General Jou...	2019-09-16	715	lot 21	CIBC	11,771.10	338,600.33
General Jou...	2019-10-01	739	Lot 21 -ch55	CIBC	3,205.21	341,805.54
General Jou...	2019-10-01	739	Lot 52 ch 130	CIBC	3,780.07	345,585.61
General Jou...	2019-10-01	739	Lot 25 ch 22	CIBC	3,701.27	349,286.88
General Jou...	2019-10-01	739	Lot 22 ch 17	CIBC	3,130.21	352,417.09
General Jou...	2019-10-01	739	Lot 51 ch 23	CIBC	4,104.11	356,521.20
General Jou...	2019-10-01	739	Lot 23 ch 33	CIBC	3,947.78	360,468.98
General Jou...	2019-10-01	739	Lot 19 ch 2202	CIBC	3,716.13	364,185.11
General Jou...	2019-10-03	734	Lot 22 ch NSF	CIBC	-3,130.21	361,054.90
General Jou...	2019-10-03	748	Lot 52	20010 · Sale Pr...	-27,675.51	333,379.39
General Jou...	2019-10-03	751	Lot 24	20010 · Sale Pr...	-206.79	333,172.60
General Jou...	2019-10-03	752	Lot 25	20010 · Sale Pr...	-36,296.33	296,876.27
General Jou...	2019-10-04	736	lot 21	CIBC	3,923.70	300,799.97
General Jou...	2019-10-04	740	Lot 18 ch 77	CIBC	3,045.55	303,845.52
General Jou...	2019-10-09	742	Lot 46- TD draft	CIBC	2,916.96	306,762.48
General Jou...	2019-10-16	754	Lot 19	20010 · Sale Pr...	-239.75	306,522.73
General Jou...	2019-10-16	756	Lot 23	20010 · Sale Pr...	-16,809.90	289,712.83
Bill	2019-10-18	Pre Occupancy	Pre-Occupancy Reimbursement	20000 · Accoun...	-9,253.36	280,459.47
Bill	2019-10-21	Lot 24	Pre-occupancy rental	20000 · Accoun...	-2,378.06	278,081.41
Bill	2019-10-21	Lot 52	Pre occupancy rental	20000 · Accoun...	-3,780.07	274,301.34
General Jou...	2019-10-23	757	Lot 45	20010 · Sale Pr...	10,495.83	284,797.17
Bill	2019-10-31	Occp.Fee		20000 · Accoun...	-886.00	283,911.17
General Jou...	2019-11-26	784	Lot 31	CIBC	2,073.55	285,984.72
General Jou...	2019-12-06	790	Lot 44	20010 · Sale Pr...	12,820.84	298,805.56
Bill	2020-02-05	Lot 23	Lot 23-Occupancy fee	20000 · Accoun...	-2,929.00	295,876.56
Total 26300 · Pre Occupancy Rental						295,876.56
TOTAL						295,876.56

This is **Exhibit "H"** referred to
in the Affidavit of Muzammil Kodwavi
sworn before me, this the 16th day of September, 2022.

A Commissioner etc.

Sara Mosadeq
LSO No.: 67864K

A handwritten signature in blue ink, consisting of a large, stylized 'S' shape with a loop at the bottom.

Sunrise Acquisitions (Hwy 7) Inc
Transactions by Account
As of 31 August 2022

2:26 PM
 2022-09-15
 Accrual Basis

Type	Date	Num	Memo	Split	Amount	Balance
26300 - Pre Occupancy Rental						
General Jou...	2018-12-18	561	Lot 25	CIBC	2,984.90	0.00
General Jou...	2018-12-21	567	Lot 19	CIBC	1,558.38	4,543.28
General Jou...	2018-12-21	568	Lot 21	CIBC	23,542.20	28,085.48
General Jou...	2018-12-21	568	Lot 21	CIBC	1,518.85	29,604.33
General Jou...	2018-12-31	672	YE entry	Work in Progress	-29,604.33	0.00
General Jou...	2019-01-02	572	Lot 25	CIBC	3,701.27	3,701.27
General Jou...	2019-01-02	572	Lot 19	CIBC	3,716.13	7,417.40
General Jou...	2019-01-02	712	Lot 18	Work in Progress	29,604.33	37,021.73
General Jou...	2019-01-09	573	Lot 24	CIBC	3,045.55	40,067.28
General Jou...	2019-01-09	573	Lot 24	CIBC	3,205.21	43,272.49
General Jou...	2019-01-18	574	Lot23-ch 27	CIBC	2,037.56	45,310.05
General Jou...	2019-02-01	576	Lot 25-ch 16	CIBC	3,701.27	49,011.32
General Jou...	2019-02-01	576	Lot 24 ch 32	CIBC	3,205.21	52,216.53
General Jou...	2019-02-01	576	Lot 19 ch 135	CIBC	3,716.13	55,932.66
General Jou...	2019-02-01	576	Lot 18 ch 45	CIBC	3,045.55	58,978.21
General Jou...	2019-02-01	576	Lot 23 ch 22	CIBC	3,947.78	62,925.99
General Jou...	2019-02-19	591	IOT 45-CH 203312	CIBC	2,050.66	64,976.65
General Jou...	2019-03-01	601		CIBC	26,438.92	91,415.57
General Jou...	2019-03-01	602	Lot 44	CIBC	5,423.29	96,838.86
General Jou...	2019-03-12	599	Yuan ch 128-lot46	CIBC	2,481.45	99,320.31
General Jou...	2019-03-20	607		CIBC	1,216.95	100,537.26
General Jou...	2019-04-01	620		CIBC	35,435.18	135,972.44
General Jou...	2019-04-10	624		CIBC	4,679.73	140,652.17
General Jou...	2019-05-01	633	C Lot 22 Draft 88568606	CIBC	40,634.87	181,287.04
General Jou...	2019-05-03	651	A Occupancy rent	CIBC	-1,733.23	179,553.81
General Jou...	2019-06-03	648	B Sajjad ch Rtn	CIBC	38,901.64	218,455.45
General Jou...	2019-06-07	664	occupancy rental	CIBC	2,712.85	221,168.30
General Jou...	2019-07-08	676	Lot 22-och 12	CIBC	3,130.21	224,298.51
General Jou...	2019-07-08	676	lot 22 ch 13	CIBC	3,205.21	227,503.72
General Jou...	2019-07-08	676	lot 44 ch 44	CIBC	3,827.89	231,331.61
General Jou...	2019-07-08	676	lot 45 ch 42	CIBC	2,901.96	234,233.57
General Jou...	2019-07-08	676	lot 46 ch 131	CIBC	1,733.23	235,966.80
General Jou...	2019-07-08	676	lot 47 ch 40	CIBC	1,733.23	237,700.03
General Jou...	2019-07-08	676	lot 50 ch 45	CIBC	4,104.11	241,804.14
General Jou...	2019-07-08	676	lot 51 ch 20	CIBC	3,780.07	245,584.21
General Jou...	2019-08-01	697	lot 52 ch 106	CIBC	1,733.23	247,317.44
General Jou...	2019-08-01	697	mk-ch 046	CIBC	1,733.23	249,050.67
General Jou...	2019-08-01	697	mk-ch 041	CIBC	2,901.96	251,952.63
General Jou...	2019-08-01	697	lot 46-ch133	CIBC	3,205.21	255,157.84
General Jou...	2019-08-01	697	lot 44 ch 043	CIBC	3,130.21	258,288.05
General Jou...	2019-08-01	697	lot 22 ch 15	CIBC	-3,205.21	255,082.84
General Jou...	2019-08-06	708	RTD ch deposit	CIBC	3,130.21	258,213.05
General Jou...	2019-09-03	702	lot 22-ch 16	CIBC	7,560.14	265,773.19
General Jou...	2019-09-04	703	lot 52-	CIBC	3,701.27	269,474.46
General Jou...	2019-09-04	703	lot 25	CIBC	3,701.27	273,175.73
General Jou...	2019-09-04	703	lot 25	CIBC	3,701.27	276,877.00
General Jou...	2019-09-04	703	lot 25	CIBC	11,843.34	288,720.34
General Jou...	2019-09-06	710	lot 23	CIBC	9,615.63	298,335.97
General Jou...	2019-09-06	710	lot 24	CIBC		

Sunrise Acquisitions (Hwy 7) Inc
Transactions by Account
As of 31 August 2022

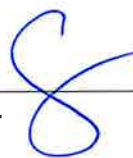
2:26 PM
 2022-09-15
 Accrual Basis

Type	Date	Num	Memo	Split	Amount	Balance
General Jou...	2019-09-06	710	lot 19	CIBC	11,148.39	309,484.36
General Jou...	2019-09-09	711	lot 18-ch54	CIBC	9,136.65	318,621.01
General Jou...	2019-09-11	713	lot 51-ch22	CIBC	8,208.22	326,829.23
General Jou...	2019-09-16	715	lot 21	CIBC	11,771.10	338,600.33
General Jou...	2019-10-01	739	Lot 21 -ch55	CIBC	3,205.21	341,805.54
General Jou...	2019-10-01	739	Lot 52 ch 130	CIBC	3,780.07	345,585.61
General Jou...	2019-10-01	739	Lot 25 ch 22	CIBC	3,701.27	349,286.88
General Jou...	2019-10-01	739	Lot 22 ch 17	CIBC	3,130.21	352,417.09
General Jou...	2019-10-01	739	Lot 51 ch 23	CIBC	4,104.11	356,521.20
General Jou...	2019-10-01	739	Lot 23 ch 33	CIBC	3,947.78	360,468.98
General Jou...	2019-10-01	739	Lot 19 ch 2202	CIBC	3,716.13	364,185.11
General Jou...	2019-10-03	734	Lot 22 ch NSF	CIBC	-3,130.21	361,054.90
General Jou...	2019-10-03	748	Lot 52	20010 · Sale Pr...	-27,675.51	333,379.39
General Jou...	2019-10-03	751	Lot 24	20010 · Sale Pr...	-206.79	333,172.60
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General Jou...	2019-12-06	790	Lot 44	20010 · Sale Pr...	12,820.84	298,805.56
Bill	2020-02-05	Lot 23	Lot 23-Occupancy fee	20000 · Accoun...	-2,929.00	295,876.56
Total 26300 · Pre Occupancy Rental						295,876.56
TOTAL						295,876.56

This is **Exhibit "I"** referred to
in the Affidavit of Muzammil Kodwavi
sworn before me, this the 16th day of September, 2022.

A Commissioner etc.

Sara Mosadeq
LSO No.: 67864K

A handwritten signature in blue ink, consisting of a large, stylized 'S' shape with a loop at the top and a tail that curves back to the left.

September 16, 2022

Sunrise Acquisitions (Hwy 7) Inc.
50 West Wilmot Street, Suite 100
Richmond Hill, ON L4B 1M5

Attention: Muzammil Kodwavi

Dear Mr. Kodwavi:

We advise that MNP was retained by Sunrise Acquisitions (Hwy 7) Inc. several weeks ago to examine certain transactions as reflected in their externally and internally prepared financial statements for the period of 2015 – 2021. We have been supplied with full general ledgers and bank statements for the corresponding periods.

Our examination of the records provided is currently underway. Unfortunately, given the extensive documentation, this examination will take longer than expected.

Despite our best efforts to conduct this examination and render a conclusion, as a result of extenuating circumstances including staff shortages, Jewish religious holidays, and partner travel, we will not be able to complete this examination and render a conclusion until October 18, 2022.

We trust this is satisfactory.

Regards,



Howard Colton, CPA, CA
Partner, MNP LLP

KINGSETT MORTGAGE CORPORATION
Applicant

-and-

SUNRISE ACQUISITIONS (HWY 7) INC.
Respondent

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

**APPLICATION UNDER SUBSECTION 243(1) OF THE
BANKRUPTCY AND INSOLVENCY ACT, R.S.C. 1985, c. B-3,
AS AMENDED, AND SECTION 101 OF THE COURTS OF
JUSTICE ACT, R.S.O. 1990, c. C.43, AS AMENDED**

Proceeding commenced at Toronto

AFFIDAVIT OF MUZAMMIL KODWAVI,
SWORN SEPTEMBER 16, 2022

RAR LITIGATION LAWYERS

Professional Corporation
1 West Pearce Street, Suite 505
Richmond Hill, Ontario
L4B 3K3

Sara Mosadeq
LSO No.: 67864K

Tel: 905-731-8100 ext. 213
sara@rarlitigation.com

Lawyers for the Respondent,
Sunrise Acquisitions (Hwy 7) Inc.,
and Sunrise Homes Ltd., Sunrise Acquisitions Inc., Sunrise
Acquisitions (Unionville) Inc., Sunrise Acquisitions (Bronte) Inc.,
Sunrise Acquisitions (Keswick) Inc., Sunrise Acquisitions (Tisdale)
Inc., SH & MK Management Inc., Sunrise Acquisitions (Keswick II)
Inc., Sajjad Hussain, Muzammil Kodwavi, Safana Kodwavi and
Mahvesh Hussain

KINGSETT MORTGAGE CORPORATION
Applicant

SUNRISE ACQUISITIONS (HWY 7) INC.
Respondent

-and-

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Proceeding commenced at Toronto

RESPONDING MOTION RECORD

RAR LITIGATION LAWYERS

Professional Corporation
1 West Pearce Street, Suite 505
Richmond Hill, Ontario
L4B 3K3

Sara Mosadeq

LSO No.: 67864K

Tel: 905-731-8100 ext. 213

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Lawyers for the Respondent,
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and Sunrise Homes Ltd., Sunrise Acquisitions Inc., Sunrise
Acquisitions (Unionville) Inc., Sunrise Acquisitions (Bronte) Inc.,
Sunrise Acquisitions (Keswick) Inc., Sunrise Acquisitions (Tisdale)
Inc., SH & MK Management Inc., Sunrise Acquisitions (Keswick II)
Inc., Sajjad Hussain, Muzammil Kodwavi, Safana Kodwavi and
Mahvesh Hussain