

June 18, 2019

Bryan A. Gelman
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Via Regular Mail

**Re: In the Matter of the Bankruptcy of The HSE Group of Companies Inc.
Estate no. 31-2466058**

Please be advised that Albert Gelman Inc. was appointed as Trustee in Bankruptcy of The HSE Group of Companies Inc. (“**HSE Group**” or the “**Bankrupt**”), pursuant to a Bankrupt Order issued by the Court on January 22, 2019.

The Trustee is aware of the following actions:

1. Plaintiff: The HSE Group of Companies Inc. Defendant: Salesforce.com Canada Corporation issued on April 6, 2017 (Court File No.: CV-17-572927).
2. Salesforce.com Canada Corporation has filed a statement of defence and counterclaim against the Bankrupt dated May 23, 2017, which action is stayed (Court File No.: CV-17-572927).

(collectively the “Actions”)

Copies of the materials in relation to the Actions provided to the Trustee can be obtained on the Trustee’s website at <https://www.albertgelman.com/corporate-solutions/other-engagements/#t>.

Please be advised that the Trustee does not intend on pursuing the Actions on behalf of the Bankrupt.

Pursuant to section 38 of the Bankruptcy and Insolvency Act (“BIA”), in circumstances where a trustee chooses not to pursue an action, any creditor may apply to the Court for an Order authorizing it to take on the matter in its own name and at its own expense and risk on such other terms as the Court may direct.

Creditors are encouraged to seek legal advice if they wish to pursue an order under section 38 of the BIA.

Sincerely,

**ALBERT GELMAN INC.,
Trustee of the Estate of
The HSE Group of Companies Inc.**

Per:



Bryan A. Gelman, *CIRP, Licensed Insolvency Trustee*