# ONTARIO SUPERIOR COURT OF JUSTICE (COMMERCIAL LIST)

### CAMERON STEPHENS MORTGAGE CAPITAL LTD.

**Applicant** 

- and -

2011836 ONTARIO CORP., JEFFERSON PROPERTIES LIMITED PARTNERSHIP, 1000162801 ONTARIO CORP., AMERCAN CORPORATION and 1000199992 ONTARIO CORP.

Respondents

IN THE MATTER OF AN APPLICATION PURSUANT TO 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

FIRST SUPPLEMENT TO THE FOURTH REPORT OF THE RECEIVER

(Dated April 21, 2025)

### A. Introduction

- 1. On December 21, 2023 (the "Appointment Date"), the Ontario Superior Court of Justice (Commercial List) (the "Court") made an order (the "Appointment Order") pursuant to section 243(1) of the *Bankruptcy and Insolvency Act* R.S.C. 1985, c. B-3, as amended ("BIA") and section 101 of the *Courts of Justice Act*, R.S.O 1990, c. 43, as amended, *inter alia*, appointing Albert Gelman Inc. ("AGI") as receiver and manager (in such capacity, the "Receiver"), without security, of all present and future property, assets and undertakings of 2011836 Ontario Corp. ("201Co.") and Jefferson Properties Limited Partnership ("JPLP" and, together with 201Co., the "Debtors"), including the real property known municipally as 39, 53 and 67 Jefferson Side Road, Richmond Hill, Ontario (the "Jefferson Properties") (collectively, the "Property"). The Appointment Order was granted pursuant to an application (the "Receivership Application") made by Cameron Stephens Mortgage Capital Ltd. ("Cameron Stephens"), the Debtors' senior secured lender.
- 2. The primary objective of these receivership proceedings is to complete the construction of a residential housing project known as "Richmond Hill Grace" (the "**Project**") and to sell the remaining units, all in an effort to maximize the recovery to the Debtors' stakeholders.
- 3. The Project consists of 96 residential units in 9 blocks, being 60 stacked condominium townhome units and 36 freehold townhome units.

# B. Purpose of Report

4. The purpose of this report (the "**First Supplement**") is to provide the Court with additional context concerning the projected borrowing and disbursements of the Receiver in connection with the Project and to provide an update on efforts by Fanseay Wang ("**Fanseay**"), the principal of the Debtors, to seek an adjournment of the Receiver's motion for an increase in its Borrowing Limit to \$40 million.

# C. Scope and Terms of Reference

- 5. This First Supplement has been prepared solely for the purposes described in this report. Accordingly, the reader is cautioned that this First Supplement may not be appropriate for any other purpose.
- 6. Capitalized terms not defined in this First Supplement have the meanings ascribed to them in the Fourth Report of the Receiver dated April 11, 2025.

# D. Projected Borrowing

- 7. As set out in the Interim SRD, as at April 4, 2025, the Receiver has borrowed \$23,225,651 to fund, principally, construction of the Project.
- 8. On or before May 5, 2025, the Receiver is projected to borrow approximately a further \$4.2 million to meet obligations related to its administration and the construction of the Project. The Receiver estimates that it will use these funds in accordance with the projection set out below:

JPLP May 5 (2025) Draw Estimate		
Payee		Amount
Receiver	\$	170,000
Insurance		60,000
Legal		60,000
Consultants		25,000
Utilities/taxes		65,000
Construction		3,725,000
Sub Total	\$	4,105,000
Lien Claims Reserve		2,250,000
Receiver's Reserve		1,000,000
Total	\$	7,355,000
*Less Trust account balance		3,141,000
Required Receiver's Draw	\$	4,214,000
* April 16, 2025		

- 9. Thereafter, the Receiver anticipates that it will need to borrow substantially all of the \$31,500,000 that it is authorized to borrow under the Appointment Order on or before June 5, 2025 to continue the construction of the Project.
- 10. Accordingly, the Receiver is of the view that the requested increase of its Borrowing Limit to \$40,000,000 is required to ensure that the Receiver has sufficient funding to continue its administration of the Debtors' estate in the coming months.

# E. April Glynn Report

11. On April 16, 2025, Glynn delivered an updated report on the projected budget of the Project (the "April Glynn Report"). The April Glynn Report estimates that the Receiver will be required to borrow a total of \$40,256,852 to complete the construction of the Project, as opposed to the \$37,804,839 estimated in the Glynn Report and set out in the Fourth Report.

12. The Receiver continues to review and consider the April Glynn Report, however at this time, the Receiver remains of the view that it is in the best interest of stakeholders for the Court to grant the requested increase in the Borrowing Limit up to \$40,000,000. Should a further increase to the Borrowing Limit be required, the Receiver intends to seek that relief at such time as the Receiver has had the opportunity to fully review and consider the April Glynn Report.

## F. Request for Adjournment

- 13. The Receiver served its motion record for the within motion on the service list in this matter on April 11, 2025. The service list included William Friedman and Khaled Gheddai of Friedman Law Professional Corporation ("Friedmans"), counsel of record for the Debtors.
- 14. Almost a week later, on April 17, 2025, Fanseay Wang ("Fanseay"), the principal of the Debtors, personally served a document purporting to be an affidavit on the service list. This document set out a request by Fanseay to adjourn the April 23, 2025 hearing of this matter for a period of 30 days to permit Fanseay to secure new legal counsel and file responding material. Copies of the materials served by Fanseay on April 17, 2025 are attached hereto as **Appendix "A."**
- 15. At the outset of this proceeding, the Debtors were represented by Friedmans. In January 2024, the Debtors retained Minden Gross LLP and then Miller Thompson LLP to represent them in this matter. In April 2024, the Debtors again retained Friedmans, who represented the Debtors in connection with the most recent motion for an increase to the Borrowing Limit, which was heard in May 2024.

-6-

16. Now, it appears that Fanseay is seeking to, again, hire new counsel to represent

the Debtors in this matter.

17. Fanseay's purported affidavit does not identify any particular concerns with the

relief being sought by the Receiver in this motion and does not state that Fanseay

opposes the Receiver's motion.

18. The Receiver notes, however, that, on April 15, 2025, Fanseay sent an email to

counsel to the Receiver advising as follows: "I am going to file my affidavit to protest your

claim. The receiver has damaged the interest of stakeholders dramatically." A copy of this

email is attached hereto as Appendix "B."

19. Fanseay has routinely opposed relief sought by the Receiver throughout this

proceeding, generally on the grounds that Fanseay is contemplating financing to redeem

the mortgages on the Real Property. Despite these representations, no such financing

has been forthcoming to date.

All of which is respectfully submitted this 21st day of April, 2025

ALBERT GELMAN INC., solely in its capacity as Court-Appointed Receiver of each of the Debtors and the Jefferson Properties

and not in any other capacity

Per:

Bryan Gelman, CIRP, LIT

Senior Managing Director

# APPENDIX A

#### **ONTARIO**

# SUPERIOR COURT OF JUSTICE

(COMMERCIAL LIST)

#### BETWEEN:

Cameron Stephens Mortgage Capital Ltd.

**Applicant** 

- and -

2011836 Ontario Corp., Jefferson Properties Limited Partnership, 1000162801 Ontario Corp., AmerCan Corporation, and 1000199992 Ontario Corp.

#### Respondents

Form 4D – Affidavit (to be sworn April 28, 2025)

#### AFFIDAVIT OF FANSEAY WANG

- I, Fanseay Wang, of the City of Fuzhou, in People's Republic of China, MAKE OATH AND SAY:
- 1. I am the sole officer and director of 2011836 Ontario Corp., and have knowledge of the matters herein, save and except where stated to be based on information and belief.
- 2. I make this affidavit in support of my motion to adjourn the April 23, 2025 hearing for a period of 30 days, to permit me adequate time to prepare and submit a properly sworn affidavit and any necessary supporting documentation.
- 3. I am currently outside of North America on a pre-scheduled overseas trip and am unable to have this affidavit sworn in time for the current hearing. I intend to swear this affidavit on April 28, 2025 and file it promptly thereafter.

- 4. I had retained legal counsel (Friedman Law Professional Corporation) earlier in the proceeding but have recently disengaged from their representation due to multiple concern. I now require time to either secure new legal counsel and prepare the document.
- 5. I am not seeking to argue the substance of the Receiver's conduct at this time. I simply seek a reasonable adjournment to allow the Court to consider full and fair materials, and for me to participate meaningfully in the next stage of these proceedings.
- 6. This motion is being made in writing as an opposed motion under Rule 37.12.1(4) of the Rules of Civil Procedure.
- 7. This motion is brought pursuant to Rules 1.04, 2.03, 3.02, and 37 of the Rules of Civil Procedure.
- 8. I swear this affidavit in good faith, seeking a fair opportunity to respond.

SWORN BEFORE ME at,	
this day of, 2025	
A Commissioner for Taking Affidavits	Fanseay Wang

**COVER EMAIL TEMPLATE** 

Subject: Notice of Motion Filed - CV-23-00710795-00CL - Fanseay Wang - Request for

Adjournment (Written Motion)

Dear Commercial List Office and Counsel,

Please find attached the following materials in respect of the above-captioned matter:

1. Form 37A - Notice of Motion (requesting a 30-day adjournment from the April 23

hearing);

2. Form 37B - Confirmation of Motion (in format conforming to RCP Form 37B);

3. Draft Affidavit of Fanseay Wang (unsigned, due to travel overseas - to be sworn on April

28, 2025).

I respectfully advise that this motion is to be heard in writing as an opposed motion under

Rule 37.12.1(4) of the Rules of Civil Procedure.

I request that the hearing currently scheduled for April 23, 2025, be adjourned for 30 days. I

have recently disengaged my prior legal counsel and am outside of Canada at this time.

I need this time to obtain a sworn affidavit and prepare supporting materials.

Please confirm that this motion will be listed. I will update CaseLines and serve the parties

with the sworn affidavit as soon as possible.

Thank you for your consideration.

Respectfully,

**Fanseay Wang** 

Email: fanseayw@bu.edu

# **SERVICE LIST (Recipients of this Motion)**

- Commercial List Office: Toronto.CommercialList@ontario.ca
- Counsel for the Receiver (Albert Gelman Inc.): Adam S. Stephens astephens@robapp.com
- Counsel for the Applicant (Cameron Stephens Mortgage Capital Ltd.):
- John Polyzogopoulos jpolyzogopoulos@blaney.com
- Nika Madyarova nmadyarova@blaney.com
- Friedman Law Professional Corporation (prior counsel for courtesy): admin@friedmanlaw.ca

#### **ONTARIO**

## **SUPERIOR COURT OF JUSTICE**

(COMMERCIAL LIST)

Form 37A

Courts of Justice Act

## **NOTICE OF MOTION**

THE MOVING PARTY, Fanseay Wang, in his capacity as the sole officer and director of 2011836 Ontario Corp., will make a motion to a judge on the Commercial List in writing, on or after April 23, 2025.

PROPOSED METHOD OF HEARING:
$\square$ In person $\square$ By telephone conference $\square$ By video conference
$\Box$ In writing under subrule 37.12.1(1) because it is (on consent, unopposed or made without notice)
☑ In writing as an opposed motion under subrule 37.12.1(4)
THE MOTION IS FOR:
- An Order adjourning the April 23, 2025 hearing for a period of 30 days;

### THE GROUNDS FOR THE MOTION ARE:

- The Moving Party is currently overseas and unable to swear an affidavit in time;

- Such further and other relief as this Honourable Court may deem just.

- The Moving Party recently disengaged legal counsel and requires time to prepare;

- The motion is brought in good faith and without delay;
- Rules 1.04, 2.03, 3.02, and 37 of the Rules of Civil Procedure.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:

- Draft Affidavit of Fanseay Wang (to be sworn on April 28, 2025);
- Such further materials as the Court may permit.

Dated: April 18, 2025

**Fanseay Wang** 

Fwang2025@icloud.com

TO: Commercial List Office - Toronto.CommercialList@ontario.ca

Counsel for the Receiver - Adam S. Stephens, astephens@robapp.com

Counsel for the Applicant – John Polyzogopoulos (jpolyzogopoulos@blaney.com),

Nika Madyarova (nmadyarova@blaney.com)

## **ONTARIO**

## SUPERIOR COURT OF JUSTICE

(COMMERCIAL LIST)

### Form 37B

### Courts of Justice Act

# **CONFIRMATION OF MOTION**

## CONFIRMATION OF MOTION

Note: If the information on this form changes, you have a duty to give the court and the other parties a corrected version of the form (rule 37.10.1(3)). If you wish to abandon the motion after it has been confirmed, a notice of abandonment may be delivered (rule 37.09(1)).

I, Fanseay Wang, the moving party, confirm that I have conferred or attempted to confer with the other party(ies) and confirm that the motion to be heard on April 23, 2025 will proceed on the following basis:
[ ] for an adjournment on consent to (date)
[X] for a contested adjournment to a date to be fixed, for the following reason: The moving party is overseas and unable to swear the affidavit until April 28, 2025. Former counsel has been disengaged. The time is needed to properly respond.
[ ] for a consent order
[ ] for a hearing of all the issues
[ ] for a hearing of the following issues only (specify)

The presiding judge will be referred to the following materials:

- Form 37A Notice of Motion
- Draft Affidavit of Fanseay Wang (to be sworn April 28, 2025)

## - Cover letter of service

I estimate that the time required for the motion, including costs submissions, will be 15 minutes for the moving party(ies) and 15 minutes for the responding party(ies) for a total of 30 minutes.

Dated: April 18, 2025

TO: Commercial List Office - Toronto.CommercialList@ontario.ca

Receiver's Counsel – Adam S. Stephens – astephens@robapp.com

Applicant's Counsel – John Polyzogopoulos (jpolyzogopoulos@blaney.com), Nika Madyarova (nmadyarova@blaney.com)

# **APPENDIX B**

# **Ryan Shah**

From:	fwang2025@icloud.con
Sent:	April 15, 2025 5:17 AM

**To:** Candace Baumtrog; Jeff Larry; Ryan Shah

Subject: Re: [EXTERNAL] Cameron Stephens v 2011836 Ontario Corp.; CV-23-00710795-00CL -

JFFERSON 101846 [IMAN-PRIMANAGE.FID404153] JEFFERSON [IWOV-

PRiManage.FID404153]

## Be Careful With This Message

From (fwang2025@icloud.com)

**High Risk Sender Location** 

The message was sent from a High Risk Country. Take caution when interacting with this message.

Dear Sirs,

Please provide the caselink access, I am going to file my affidavit to protest your claim.

The receiver has damaged the interest of stakeholders dramatically.

Please note this is my email address, I cannot access google mailbox in China.

Best Regards, Fanseay

On Apr 12, 2025, at 4:32 AM, <Candace.Baumtrog@paliareroland.com> <Candace.Baumtrog@Paliareroland.com> wrote:

Dear Service List:

Due to the size of the document, we are also serving it pursuant to the *Rules* via secure link below:

https://www.imanageshare-ca.com/pd/12WImlsBjZ7

This link expires on April 26th.

Sincerely,



From: Candace Baumtrog

Sent: Friday, April 11, 2025 4:26 PM

To: 'wgreenspoon@garfinkle.com' <wgreenspoon@garfinkle.com>; 'bgelman@albertgelman.com' <bgelman@albertgelman.com>; 'wf@friedmans.ca' <wf@friedmans.ca>; 'fanseaywang@gmail.com' <fanseaywang@gmail.com>; 'Dpo.CaymanIslands@portcullis.co' < Dpo.CaymanIslands@portcullis.co>; 'Info.CaymanIslands@portcullis.co' <Info.CaymanIslands@portcullis.co>; 'kcl g.finance@kubota.com' <kcl g.finance@kubota.com>; 'mhurley@berkleysurety.com' <mhurley@berkleysurety.com>; 'skeddy@berkleysurety.com' <skeddy@berkleysurety.com>; 'harvey@chaitons.com' <harvey@chaitons.com>; 'laurac@chaitons.com' <laurac@chaitons.com>; 'kyatabe@duca.com' <kyatabe@duca.com>; 'jessica.guilbault@bnc.ca' <jessica.guilbault@bnc.ca>; 'dpreger@dickinsonwright.com' <dpreger@dickinsonwright.com>; 'insolvency.unit@ontario.ca' <insolvency.unit@ontario.ca>; 'fsouza@lawtoronto.com' <fsouza@lawtoronto.com>; 'ebisceglia@lawtoronto.com' <ebisceglia@lawtoronto.com>; 'cecilia@lawtoronto.com' <cecilia@lawtoronto.com>; 'pmartin@berkleysurety.com' <pmartin@berkleysurety.com>; 'gazeff@millerthomson.com' <gazeff@millerthomson.com>; 'aslavens@torys.com' <aslavens@torys.com>; 'JMACLELLAN@blg.com' <JMACLELLAN@blg.com>; 'mcooper@whlawyers.ca' <mcooper@whlawyers.ca>; 'jcecchetto@dcworkplacelaw.ca' <jcecchetto@dcworkplacelaw.ca>; 'dwoo@albertgelman.com' <dwoo@albertgelman.com>; 'azeldin@albertgelman.com' <azeldin@albertgelman.com>; 'dcamenzuli@dcworkplacelaw.ca' <dcamenzuli@dcworkplacelaw.ca>; 'admin@dcworkplacelaw.ca' <admin@dcworkplacelaw.ca>; 'paolo@spectrumsky.com' <paolo@spectrumsky.com>; 'aslavens@torys.com' <aslavens@torys.com>; 'David.patel@nbc.ca' <David.patel@nbc.ca>; 'SASTOLFO@weirfoulds.com' <SASTOLFO@weirfoulds.com>; 'pcho@weirfoulds.com' <pcho@weirfoulds.com>; 'amelia@bianchipresta.com' <amelia@bianchipresta.com>; 'dpresta@bianchipresta.com' <dpresta@bianchipresta.com>; 'eiellimo@bianchipresta.com' <eiellimo@bianchipresta.com>; 'ibogdanovich@duca.com' <ibogdanovich@duca.com>; 'rmoubarak@sutherlaw.com' <rmoubarak@sutherlaw.com>; 'ahora@garfinkle.com' <ahora@garfinkle.com>; 'ifrustaglio@sutherlaw.com' <ifrustaglio@sutherlaw.com>; 'pcho@weirfoulds.com' <pcho@weirfoulds.com>; 'Justin.Vetro@hcraontario.ca' <Justin.Vetro@hcraontario.ca>; 'janet@jklawfirm.ca' <janet@jklawfirm.ca>; 'info@kalemilaw.ca' <info@kalemilaw.ca>; 'kalemilaw@gmail.com' <kalemilaw@gmail.com>; 'nicole@belsitolaw.ca' <nicole@belsitolaw.ca>; 'chris@belsitolaw.ca' chris@belsitolaw.ca>; 'shanti@pmlawyers.ca' <shanti@pmlawyers.ca>; 'laxmi@pmlawyers.ca' <laxmi@pmlawyers.ca>; 'mmuscolino@kennaley.ca' <mmuscolino@kennaley.ca>; 'ecisternas@corelawyers.ca' <ecisternas@corelawyers.ca>; 'katherine@katherinewong.net' <katherine@katherinewong.net>; 'ecisternas@corelawyers.ca' <ecisternas@corelawyers.ca>; 'jelani@RAMACHANDRAN.LAW' < jelani@RAMACHANDRAN.LAW >; 'kg@friedmans.ca' <kg@friedmans.ca>; 'nbeker1@gmail.com' <nbeker1@gmail.com>; '007arthur@gmail.com' <<u>007arthur@gmail.com</u>>; '<u>b4\_andy@hotmail.com</u>' <<u>b4\_andy@hotmail.com</u>>; 'tsjohnnylam@gmail.com' <tsjohnnylam@gmail.com>; 'sparkbusted@gmail.com' <sparkbusted@gmail.com>; 'nasmostafaee@gmail.com' <nasmostafaee@gmail.com>; 'nhh5858@gmail.com' <nhh5858@gmail.com>; 'nahogyun93@gmail.com' <nahogyun93@gmail.com>; 'amcodk@yahoo.com' <amcodk@yahoo.com>; 'rouzbeh.esmaeil@gmail.com' <rouzbeh.esmaeil@gmail.com>; 'nadira 1707@hotmail.com' <nadira 1707@hotmail.com>; 'guillermo madriz04@yahoo.com' <guillermo madriz04@yahoo.com>; 'info@skywaystrucking.ca' <info@skywaystrucking.ca>; 'harpz.s@gmail.com' <harpz.s@gmail.com>; 'aguzman674@yahoo.com' <aguzman674@yahoo.com>; 'julie.verduci@utoronto.ca' <julie.verduci@utoronto.ca>; 'xu1302@gmail.com' <xu1302@gmail.com>; 'johnyt939@gmail.com' <johnyt939@gmail.com>; 'dlywxx@hotmail.com' <dlywxx@hotmail.com>; 'amse4891@gmail.com' <amse4891@gmail.com>; 'vintik.davie@gmail.com' <vintik.davie@gmail.com>; 'ikra4560@mylaurier.ca' <ikra4560@mylaurier.ca>; 'anaumnawaz@hotmail.com' <anaumnawaz@hotmail.com>;

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'jamshaidhashmi@gmail.com' <jamshaidhashmi@gmail.com>; 'autop258@gmail.com'
<autop258@gmail.com>; 'viki.jiechen@gmail.com' <viki.jiechen@gmail.com>;
'bin hu2002@yahoo.com' <bin hu2002@yahoo.com>; 'jennifer zhang03@hotmail.com'
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'nikkibielas@gmail.com' <nikkibielas@gmail.com>; 'emanuel@tropiclove.com'
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'alireza.sadeghi56@yahoo.com' <alireza.sadeghi56@yahoo.com>; 'i.pana@hotmail.ca'
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<gnabisha.s@gmail.com>; 'peteratas34@gmail.com' <peteratas34@gmail.com>;
'mohammad2001ca@yahoo.ca' <mohammad2001ca@yahoo.ca>; 'dukuh@naver.com'
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<leirocowang@gmail.com>; 'ojayike@yahoo.com' <ojayike@yahoo.com>; 'jogunl0942@gmail.com'
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'boyinepally@gmail.com' <boyinepally@gmail.com>; 'arunsoni 1203@hotmail.com'
<arunsoni 1203@hotmail.com>; 'mahrukh.khan55@gmail.com' <mahrukh.khan55@gmail.com>;
'amse4891@gmail.com' <amse4891@gmail.com>; 'irenesinha@gmail.com' <irenesinha@gmail.com>;
'pthiyagarajah@live.ca' <pthiyagarajah@live.ca>; 'dr imranibrahim@yahoo.com'
<dr imranibrahim@yahoo.com>; 'ferzana.kouser@yahoo.com' <ferzana.kouser@yahoo.com>;
'SALMA@DARLPC.COM' <SALMA@DARLPC.COM>; 'halinalyons@hotmail.com'
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'ashleelam365@gmail.com' <ashleelam365@gmail.com>; 'info@skywaystrucking.ca'
<info@skywaystrucking.ca>; 'gracehonggao@hotmail.com' <gracehonggao@hotmail.com>;
'remaxImperialinfo@gmail.com' <remaxImperialinfo@gmail.com>; 'harveydong@gmail.com'
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<munishbatish@gmail.com>; 'gloriatong@yahoo.com' <gloriatong@yahoo.com>;
'info@myinvestmentbrokers.com' <info@myinvestmentbrokers.com>; 'kevin@iprorealty.com'
<kevin@iprorealty.com>; 'helen@topremax.ca' <helen@topremax.ca>; 'david pang@rogers.com'
<david pang@rogers.com>; 'Shubh.garg@exprealty.com' <Shubh.garg@exprealty.com>;
'info@condocircle.ca' <info@condocircle.ca>; 'staffres@capitalnorthrealty.com'
<staffres@capitalnorthrealty.com>; 'agandrewjmizzoni@live.ca' <agandrewjmizzoni@live.ca';
'msaran555@gmail.com' <msaran555@gmail.com>; 'rosyjoneja@gmail.com' <rosyjoneja@gmail.com>;
'jbozzo@spectrumrealtyservices.com' <jbozzo@spectrumrealtyservices.com>;
'frankvisconti@hotmail.com' <frankvisconti@hotmail.com>; 'ourbesthomes.ca@gmail.com'
<ourbesthomes.ca@gmail.com>; 'koonal.pandya@gmail.com' <koonal.pandya@gmail.com>;
'uma.mahendran@hotmail.com' <uma.mahendran@hotmail.com>; 'bcglassandstone@hotmail.com'
<br/><bcglassandstone@hotmail.com>; 'jjanmohamed@sutherlaw.com' <jjanmohamed@sutherlaw.com>;
'jtrasvina@sutherlaw.com' <jtrasvina@sutherlaw.com>; 'ktoma@sutherlaw.com'
<ktoma@sutherlaw.com>; 'kahmadi@nklawyers.ca' <kahmadi@nklawyers.ca>; 'teena@teenalaw.com'
<teena@teenalaw.com>; 'nanda@nanda.ca' <nanda@nanda.ca>; 'denise@lawyer4me.com'
<denise@lawyer4me.com>; 'info@landmarklaw.ca' <info@landmarklaw.ca>; 'ysingh@kormans.ca'
<ysingh@kormans.ca>; 'rajinder@singhlawoffice.ca' <rajinder@singhlawoffice.ca>;
chrischan@sunpartners.ca' <chrischan@sunpartners.ca>; 'jimzhang100@gmail.com'
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**Subject:** RE: Cameron Stephens v 2011836 Ontario Corp.; CV-23-00710795-00CL - JFFERSON 101846 [IMAN-PRIMANAGE.FID404153] JEFFERSON [IWOV-PRIManage.FID404153]

#### Dear Service List:

Attached please find the Motion Record of the Receiver, Albert Gelman Inc., returnable April 23, 2025, served on you pursuant to the *Rules of Civil Procedure*.

Sincerely,

The information contained in this e-mail message may be privileged, confidential and protected from disclosure. If you are not the intended recipient, any use, disclosure, dissemination, distribution or copying of any portion of this message or any attachment is strictly prohibited.