

Court File No. BK-25-03215064-0031  
Estate File No. 31-3215064

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)  
(IN BANKRUPTCY AND INSOLVENCY)**

**IN THE MATTER OF THE *BANKRUPTCY AND INSOLVENCY ACT*,  
R.S.C. 1985, c. B-3, AS AMENDED**

**AND IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE  
A PROPOSAL OF BOOKJANE INC., OF THE CITY OF TORONTO,  
IN THE PROVINCE OF ONTARIO**

**MOTION RECORD  
(Returnable May 20, 2025)**

May 14, 2025

**GARFINKLE BIDERMAN LLP**  
Barristers & Solicitors  
1 Adelaide Street East, Suite 801  
Toronto, Ontario  
M5C 2V9

**Wendy Greenspoon-Soer** LSO#: 34698L  
wgreenspoon@garfinkle.com  
Tel: 416-869-7615  
Fax: 416-869-0547

Lawyers for BookJane Inc.

TO: SERVICE LIST

Court File No. BK-25-03215064-0031  
Estate File No. 31-3215064

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)  
(IN BANKRUPTCY AND INSOLVENCY)**

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# **TAB 1**

Court File No. BK-25-03215064-0031  
Estate File No. 31 – 3215064

**ONTARIO**  
**SUPERIOR COURT OF JUSTICE**  
**(COMMERCIAL LIST)**  
**(IN BANKRUPTCY AND INSOLVENCY)**

**IN THE MATTER OF THE *BANKRUPTCY AND INSOLVENCY ACT*,  
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**AND IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A  
PROPOSAL OF BOOKJANE INC., OF THE CITY OF TORONTO, IN  
THE PROVINCE OF ONTARIO**

**NOTICE OF MOTION**

**BOOKJANE INC.** (the "Company"), will make a motion before a Judge of the Ontario Superior Court of Justice (Commercial List) (the "Court"), on May 20, 2025 at 11:30 am, or as soon after that time as the motion can be heard, by judicial video conference via Zoom at Toronto, Ontario, for an Order, *inter alia*, pursuant to Section 50.4(9) of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended (the "BIA"). Please advise if you intend to join the hearing by emailing Wendy Greenspoon-Soer at [wgreenspoon@garfinkle.com](mailto:wgreenspoon@garfinkle.com) and the video conference details will be provided once available.

**PROPOSED METHOD OF HEARING:** The motion is to be heard orally via zoom videoconference.

**THE MOTION IS FOR:**

1. An Order substantially in the form attached at Tab 3 of the Motion Record, *inter alia*:
  - (a) abridging the time for service of this Notice of Motion and the Motion Record so that the motion is properly returnable on May 20, 2025, and dispensing with service on any persons other than those served;

- (b) extending the time within which to file a proposal with the Official Receiver by the Company to July 7, 2025, pursuant to Section 50.4(9) of the BIA;
- (c) granting a first ranking priority charge over all of the Company's property, assets and undertakings (collectively, the "**Property**") in the amount of \$220,000.00 in favour of Albert Gelman Inc. ("**AGI**"), in its capacity as proposal trustee (the "**Proposal Trustee**"), counsel to the Proposal Trustee and counsel to the Company (the "**Administration Charge**"); and
- (d) such other and further relief as counsel may request and this Honourable Court may allow.

## **THE GROUNDS FOR THE MOTION ARE:**

### **Background**

1. On April 23, 2025 (the "**Filing Date**"), the Company filed a Notice of Intention to Make a Proposal pursuant to Section 50.4 of the BIA (the "**NOI**") and appointed AGI as Proposal Trustee in respect of the NOI proceedings.
2. The Company is a federally incorporated company which carries on business from leased premises located in North York, Ontario.
3. The Company operates primarily as a Software as a Service ("**SAAS**") provider of staff booking solutions to businesses in healthcare and aged care. As of the Filing Date, the Company employed approximately 17 salaried employees.
4. The Company has been reliant on funding provided by its senior secured lender-AYAL Capital Advisors Elite Fund LP ("**AYAL**") as collateral agent for AYAL, Amica SEnoir

Lifestyles Trust, KB Capital Management Inc. and Zahra Salibury (the “**Noteholders**” and together, the “**Senior Secured Lender**”) in order to fund its operations.

5. The Company's NOI filing was prompted by its deteriorating financial and liquidity position and the unwillingness of its Senior Secured Lender to continue funding the Company's capital requirements.

6. The Company had previously engaged in efforts to seek offers for the purchase of its business and/or assets but after 15 months on the market no satisfactory offers or expressions of interest had been received. Prior to the NOI filing, the Company engaged AGI to assist in conducting a further sale process (the “**Sale Process**”).

7. The Sale Process was conducted over a three-week period. 19 prospective bidders executed non-disclosure agreements and were given access to the data room. The Sale Process did yield one conditional letter of intent (the “**LOI**”) that was considered by the Company and its Senior Secured Lender, but ultimately the Company determined that the LOI was not satisfactory.

8. Given the results of the Sale Process and the lack of any Qualified Bids, Ayal advised that it intended to submit its own offer to purchase the Company's assets.

9. The principal purpose of the NOI proceedings was to create a stabilized environment to allow the Company to negotiate the terms of an asset purchase agreement (the “**APA**”) with AYAL and complete a transaction for the acquisition of substantially all of its assets.

10. The Company and AYAL continue to negotiate the terms of the APA and it is expected that the APA will be finalized in short order such that the Company will return to seek the

Court's approval of the APA, the transaction contemplated therein and an Order vesting the purchased assets under the APA in AYAL, prior to the expiry of the requested deadline to file a proposal of July 7, 2025.

### **Extension of Deadline to File Proposal**

11. The current deadline by which the Company must file a proposal with the Official Receiver under the BIA is May 23, 2025.

12. The Company is seeking an extension of the deadline for it to file a proposal with the Official Receiver until July 7, 2025 to provide additional time to negotiate the APA and close the transaction contemplated therein.

13. None of the Company's creditors will be materially prejudiced if the extension is granted.

### **The Administration Charge**

14. The Company is seeking the Administration Charge against the Property to secure the fees and disbursements incurred in connection with services rendered to the Company or in furtherance of the NOI proceedings both before and after the Filing Date by the Proposal Trustee, its counsel, Capstone Legal, and the Company's counsel, Garfinkle, Biderman LLP.

15. The Administration Charge will rank in priority to all other security interests and the quantum was determined in consultation with the Proposal Trustee and the Company and is reasonable in the circumstances.

### **Statutory and Other Grounds**

16. Rules 1.04, 1.05, 2.01, 2.03, 16.04 and 37 of the *Rules of Civil Procedure*, R.R.O 1990, Reg. 194, as amended, and Sections 50.4(9), 65.13 and 84.1 of the BIA; and

17. Such further and other grounds as set out in the First Report of the Proposal Trustee, to be filed (the “**First Report**”).

**AND FURTHER TAKE NOTICE** that the following materials will be filed in support of this motion, namely:

- (a) the Affidavit of Curtis Khan sworn May 13, 2025;
- (b) the First Report to be filed separately; and
- (c) such further and other material as counsel may advise and this Honourable Court may allow.

May 14, 2025

**GARFINKLE, BIDERMAN LLP**  
**Barristers & Solicitors**  
1 Adelaide Street East, Suite 801  
Toronto, ON M5C 2V9

**Wendy Greenspoon-Soer (LSO#34698L)**  
Tel: 416-869-1234  
Email: [wgreenspoon@garfikle.com](mailto:wgreenspoon@garfikle.com)  
**Lawyers for BookJane Inc.**

Court File No. BK-25-03215064-0031  
Estate File No. 31-3215064

**IN THE MATTER OF THE *BANKRUPTCY AND INSOLVENCY ACT*, R.S.C. 1985, c. B-3, AS AMENDED  
AND IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF BOOKJANE INC., OF THE CITY OF  
TORONTO, IN THE PROVINCE OF ONTARIO**

---

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)  
(IN BANKRUPTCY AND  
INSOLVENCY)**

PROCEEDINGS COMMENCED AT  
TORONTO

---

**NOTICE OF MOTION**  
(returnable May 20, 2025)

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**GARFINKLE BIDERMAN LLP**  
Barristers & Solicitors  
1 Adelaide Street East, Suite 801  
Toronto, Ontario M5C 2V9

Wendy Greenspoon-Soer -LSO#: 34698L  
Tel: 416-869-1234  
Email: [wggreenspoon@garfinkle.com](mailto:wggreenspoon@garfinkle.com)

Lawyers for BookJane Inc.

# **TAB 2**

Court File No. BK-25-03215064-0031  
Estate File No. 31-3215064

**ONTARIO**  
**SUPERIOR COURT OF JUSTICE (COMMERCIAL LIST)**  
**(IN BANKRUPTCY AND INSOLVENCY)**

**IN THE MATTER OF THE *BANKRUPTCY AND INSOLVENCY ACT*,  
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**AND IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A  
PROPOSAL OF BOOKJANE INC., OF THE CITY OF TORONTO, IN THE  
PROVINCE OF ONTARIO**

**AFFIDAVIT OF CURTIS KHAN**

I, **Curtis Khan**, of the Town of Richmond Hill, in the Province of Ontario, make oath and say as follows:

1. I am a director and CEO, as well as the founder of BookJane Inc. (“**BookJane**” or the “**Company**”). As such, I have knowledge of the facts set out in this affidavit. Where the information set out in this affidavit is based upon information which I have received from others, I have stated the source of that information, and I verily believe it to be true.
  
2. I file this affidavit in support of the Company’s motion for an Order (i) extending the time within which the Company shall file a proposal with the Official Receiver and extending the corresponding stay of proceedings; and (ii) granting a first ranking priority charge over all of the Company’s property, assets and undertakings (the “**Property**”) in favour of Albert Gelman Inc. (“**AGI**”) in its capacity as proposal trustee (the “**Proposal Trustee**”), counsel for the Proposal Trustee and counsel for the Company (the “**Administration Charge**”).

## Background

3. BookJane is a federally incorporated company, incorporated under the *Canada Business Corporations Act*, on February 24, 2016. Its registered head office is located in Richmond Hill but it operates from leased premises located in North York, Ontario. The company operates primarily as a Software as a Service provider of staff booking solutions to businesses in healthcare and aged care.

4. As of the date of this affidavit, the Company has seventeen salaried employees (the “**Employees**”). There is no company sponsored pension plan in place, nor are any of the Employees unionized.

5. The Company is insolvent and unable to meet its liabilities generally as they fall due. The company’s insolvency is as a result of its inability to generate sufficient revenue to offset its operating costs.

6. The Company has been reliant on funding provided by its senior secured lender – AYAL Capital Advisors Elite Fund LP (“**AYAL**”) as collateral agent for AYAL, Amica Senior Lifestyles Trust, KB Capital Management Inc. and Zahra Salibury (the “**Noteholders**” and together, the “**Senior Secured Lender**”) in order to fund its operations. Since providing capital in the most recent financing round in December of 2022, the Senior Secured Lender has been unwilling to advance further funding to cover operating losses and has required that the Company operate on a self-sustaining basis. After multiple rounds of lay-offs and cost cuts, the Company achieved operating profitability in 2024. However, the Company continued to have past-due debts including past-due unsecured amounts owing to multiple parties and, as a result, we determined that it was necessary to sell the business or the Company’s assets.

**A. The Sale Process**

7. Commencing in November 2023, together with the Senior Secured Lender, BookJane sought offers to purchase its business and/or assets. Several industry participants and private equity firms were approached. Although there was some interest, none of the offers made were acceptable to the Company or the Senior Secured Lender.

8. On behalf of the Company, I engaged AGI in March of 2025, to provide financial advice and to assist with conducting a formal sale process to canvas the market and solicit offers for the purchase of BookJane's business and/or assets (the "**Sale Process**").

9. As part of the Sale Process, the following steps were taken:

- (a) AGI prepared an interest solicitation summary detailing the acquisition opportunity;
- (b) AGI, in consultation with me and with representatives the Company's Senior Secured Lender, prepared a list of potential interested parties (the "**Prospective Participants**"). The Prospective Participants included both financial and strategic buyers;
- (c) AGI distributed the interest solicitation summary to approximately 70 Prospective Participants;
- (d) AGI placed a notice of the Sale Process in Insolvency Insider, a restructuring industry newsletter;
- (e) AGI placed a notice of the Sale Process on its website;

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- (f) Prospective Participants that executed a non-disclosure agreement (“**NDA**”) were provided access to a virtual data room (the “**Data Room**”) maintained by AGI. The Data Room contained confidential information about the Company, including financial and other relevant information pertaining to the Company and the acquisition opportunity;
- (g) The procedures for the submission of bids in the Sale Process (the “**Sale Process Procedures**”) were also uploaded to the Data Room and set out, among other things, deadlines for the submission of bids and bid criteria;
- (h) The Data Room also contained a template asset purchase agreement for prospective purchasers to use in submitting their bids.

10. The Sale Process Procedures provided that any offers submitted were to be on an “as is, where is” basis with limited representations and warranties by the Company.

11. The deadline for the submission of bids was April 11, 2025, at 5:00 p.m. (Toronto time) (the "**Bid Deadline**").

12. Nineteen (19) prospective purchasers executed NDAs (each a “**Prospective Bidder**”) and accessed the Data Room.

13. Together with assistance from AGI, I facilitated the sharing of further information and participated in discussions with several interested parties who requested it as part of their diligence efforts.

14. As of the Bid Deadline, the Company received only one offer in the form of a conditional Letter of Intent. Notwithstanding that the form of offer was not in compliance with the Sale

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Process Procedures, in consultation with the Senior Secured Lender, we considered its terms. Ultimately, the terms of the offer were unacceptable to the Company.

15. Additional details regarding the Sale Process and the results thereof are addressed in greater detail in the First Report.

16. The market was canvassed informally by the Company for 15 months first and then formally for three weeks. I verily believe that the market was widely canvassed both before and during the Sale Process and that the Sale Process conducted was commercially reasonable.

17. Given the results of the Sale Process and the lack of any Qualified Bids, Ayal advised that it intended to submit its own offer to purchase the Company's assets

***B. The NOI***

18. On April 23, 2025, BookJane filed a Notice of Intention to make a proposal ("NOI") under the *BIA*. A copy of the certificate for the NOI is attached as **Exhibit "A"** hereto.

19. AGI was appointed as Proposal Trustee in the NOI proceedings.

20. Although the Sale Process was conducted outside of the NOI proceedings, the objective in filing the NOI was to create a stable environment to allow the Company to negotiate the terms of an asset purchase agreement ("APA") with Ayal for the acquisition of substantially all of its assets.

21. The Company is continuing to negotiate the terms of the APA with Ayal and it is expected that the APA will be finalized in short order such that the Company will then return to seek the Court's approval of the APA, the transaction contemplated therein and an Order vesting the purchased assets under the APA in Ayal, prior to July 7, 2025, being the expiry of the extended deadline to file a proposal as sought in the within motion.

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***Extension of the Time to File a Proposal***

22. The current deadline by which the Company must file a proposal with the Official Receiver under the *BIA* is May 23, 2025.

23. BookJane is seeking a brief extension of that deadline, along with a corresponding extension of the stay of proceedings until July 7, 2025, to allow it to complete its negotiations the APA and close the transaction contemplated therein. BookJane will return to court as soon as possible before July 7, 2025, once the APA has been finalized.

24. I verily believe that throughout the Sale Process and since the filing of the NOI, the Company has acted in good faith and with due diligence.

25. I verily believe that none of the Company's creditors will be materially prejudiced if the extension is granted.

***C. The Administration Charge***

26. The Company is seeking the Administration Charge against the Property to secure the fees and disbursements incurred in connection with services rendered to the Company or in furtherance of the NOI proceedings both before and after the filing of the NOI, by the Proposal Trustee, its counsel Capstone Legal, and the Company's counsel, Garfinkle Biderman, LLP.

27. The Administration Charge sought would rank in priority to all other security interests and the quantum was determined in consultation with the Proposal Trustee and Ayal and is reasonable in the circumstances.

28. I swear this affidavit in support of BookJane's request for the relief set out in their Notice of Motion dated May 13, 2025, including but not limited to an Order (i) extending the time within

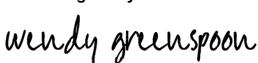
-7-

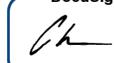
which the Company shall file a proposal with the Official Receiver and extending the corresponding stay of proceedings; and (ii) granting a first ranking priority charge over all of the Company's Property.

**AFFIRMED** remotely by Curtis Khan at the  
Town of Richmond Hill in the Province of  
Ontario, before me on this 13<sup>th</sup> day of May,  
2025 in accordance with O. Reg. 431/20,  
*Administering Oath or Declaration Remotely*

Commissioner for Taking Affidavits

**Wendy Greenspoon-Soer**

DocuSigned by:  
  
8AA5F854A6B7452...

DocuSigned by:  
  
D27A9A644001435...

**CURTIS KHAN**

This is Exhibit "A" referred to in the Affidavit of Curtis Khan sworn by Curtis Khan of the City of Richmond Hill, in the Regional Municipality of York, before me at the City of Toronto, in the Province of Ontario, on May 13, 2025 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:



8AA5F854A6B7452...

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*Commissioner for Taking Affidavits (or as may be)*

**WENDY GREENSPOON-SOER**



Industry Canada  
**Office of the Superintendent  
of Bankruptcy Canada**

Industrie Canada  
**Bureau du surintendant  
des faillites Canada**

District of: Ontario  
Division No.: 09 - Toronto  
Court No.: 31-3215064  
Estate No.: 31-3215064

In the Matter of the Notice of Intention to make a proposal of:

**BookJane Inc.**

Insolvent Person

**ALBERT GELMAN INC.**  
Licensed Insolvency Trustee

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Date of the Notice of Intention:

April 23, 2025

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**CERTIFICATE OF FILING OF A NOTICE OF INTENTION TO MAKE A PROPOSAL**  
**Subsection 50.4 (1)**

I, the undersigned, Official Receiver in and for this bankruptcy district, do hereby certify that the aforementioned insolvent person filed a Notice of Intention to Make a Proposal under subsection 50.4 (1) of the Bankruptcy and Insolvency Act;

Pursuant to subsection 69. (1) of the Act, all proceedings against the aforementioned insolvent person are stayed as of the date of filing of the Notice of Intention.

Date: April 24, 2025, 09:31  
Official Receiver

E-File/Dépôt Electronique

151 Yonge Street, 4th Floor, Toronto, Ontario, Canada, M5C2W7, (877)376-9902

**Canada**

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL  
UNDER THE BANKRUPTCY AND INSOLVENCY ACT, R.S.C. 1985, c. B-3, AS  
AMENDED, OF BOOKJANE INC.**

Court File No.: BK-25-03215064-0031  
Estate File No.: 31-3215064

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**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)  
(IN BANKRUPTCY AND INSOLVENCY)**

Proceeding commenced at TORONTO

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**AFFIDAVIT OF CURTIS KHAN**

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**GARFINKLE BIDERMAN LLP**  
Barristers & Solicitors  
1 Adelaide Street East, Suite 801  
Toronto, Ontario M5C 2V9

Wendy Greenspoon-Soer LSO#: 34698L  
Tel: 416-869-1234  
Email: [wgreenspoon@garfinkle.com](mailto:wgreenspoon@garfinkle.com)

Lawyers for BookJane Inc.

# **TAB 3**

Court File No. BK-25-03215064-0031  
Estate File No. 31-3215064

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)  
IN BANKRUPTCY AND INSOLVENCY**

THE HONOURABLE ) TUESDAY, THE 20<sup>TH</sup> DAY  
JUSTICE CAVANAGH ) OF MAY 2025  
 )

**IN THE MATTER OF THE *BANKRUPTCY AND INSOLVENCY ACT*,  
R.S.C. 1985, c. B-3, AS AMENDED**

**AND IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A  
PROPOSAL OF BOOKJANE INC., OF THE CITY OF TORONTO, IN THE  
PROVINCE OF ONTARIO**

**ORDER**

**THIS MOTION**, made by BookJane Inc. (the "Company") for an order, *inter alia*, extending the time for filing a proposal pursuant to Section 50.4(9) of the *Bankruptcy and Insolvency Act* (the "BIA") was heard this day by Zoom videoconference.

**ON READING** the motion record of the Company, the first report of Albert Gelman Inc., in its capacity as proposal trustee (the "Proposal Trustee") and the appendices thereto (the "First Report"), and on hearing submissions of counsel for the Company and the Proposal Trustee and those other parties listed on the counsel slip, no one else appearing for any other person although duly served as appears from the affidavit of Monika Gugu sworn May 14, 2025, filed:

**SERVICE**

1. **THIS COURT ORDERS** that the time for service and filing of the Notice of Motion and the Motion Record is hereby abridged and validated so that this motion is properly returnable today and hereby dispenses with further service thereof.

**EXTENSION OF TIME FOR PROPOSAL**

2. **THIS COURT ORDERS** that the time within which to make a proposal pursuant to Section 62(1) of the BIA and the corresponding stay of proceedings provided for in Section 69 of the BIA, be and are hereby extended in accordance with Section 50.4(9) of the BIA, to and including July 7, 2025.

**ADMINISTRATION CHARGE**

3. **THIS COURT ORDERS** that the Proposal Trustee, counsel to the Proposal Trustee and counsel to the Company shall be entitled to the benefit of and are hereby granted a first ranking priority charge (the “**Administration Charge**”) on all of the present and after-acquired property, assets and undertakings of the Company of every nature and kind whatsoever, and wherever situate including all proceeds thereof (the “**Property**”), which charge shall not exceed the amount of \$220,000.00, as security for their professional fees and disbursements incurred at the standard rates and charges of the Proposal Trustee and such counsel, both before and after the making of this Order in respect of these proceedings.

4. **THIS COURT ORDERS** that the filing, registration or perfection of the Administration Charge shall not be required and that the Administration Charge shall be valid and enforceable for all purposes, including as against any right, title or interest filed, registered, recorded or perfected subsequent to the Administration Charge coming into existence, notwithstanding any such failure to file, register, record or perfect.

5. **THIS COURT ORDERS** that the Administration Charge shall constitute a charge on the Property and such charge shall rank in priority to all other security interests, trusts, liens, charges and encumbrances, claims of secured creditors, statutory or otherwise, in favour of any individual, firm, corporation, governmental body or agency, or any other entities, granted by the Company or to which the Company is subject (together, the “**Encumbrances**”) as of the date of this Order.

6. **THIS COURT ORDERS** that the Administration Charge shall not be rendered invalid or unenforceable and the rights and remedies of the chargees entitled to the benefit of the Administration Charge thereunder shall not otherwise be limited or impaired in any way by: (a) the pendency of these proceedings and the declarations of insolvency made herein; (b) any application for a bankruptcy order issued pursuant to the BIA or any bankruptcy order made pursuant to such an application; (c) the filing of any assignment for the general benefit of creditors made pursuant to the BIA; (d) the provision of any federal or provincial statutes; or (e) any negative covenants, prohibitions or similar provisions with respect to borrowings, incurring debt or the creation of Encumbrances, contained in any existing documents or agreements (together, the “**Agreements**”) which bind the Company and notwithstanding any provision to the contrary in any Agreement:

- (a) the creation of the Administration Charge shall not create or be deemed to constitute a breach by the Company of any Agreement to which it is a party;
- (b) none of the chargees shall have any liability to any person whatsoever as a result of any breach of any Agreement caused by or resulting from the creation of the Administration Charge; and
- (c) the granting of the Administration Charge does not and will not constitute a preference, fraudulent conveyance, transfer at undervalue, oppressive conduct or other challengeable or voidable transactions under any applicable law.

## **GENERAL**

7. **THIS COURT HEREBY REQUESTS** the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or in the United States to give effect to this Order and to assist the Company and the Proposal Trustee and its agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Proposal Trustee, as an officer of this Court, as may be necessary or desirable to give effect to this Order or to assist the Company and the Proposal Trustee and its agents in carrying out the terms of this Order.

8. **THIS COURT ORDERS** that each of the Company and the Proposal Trustee shall be at liberty and are hereby empowered to apply to any court, tribunal, regulatory or administrative body, wherever located, for the recognition of this Order and for assistance in carrying out the terms of this Order.

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**IN THE MATTER OF THE *BANKRUPTCY AND INSOLVENCY ACT, R.S.C. 1985, c. B-3, AS AMENDED***

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF BOOKJANE INC., OF THE CITY OF TORONTO, IN THE PROVINCE OF ONTARIO**

---

***ONTARIO***  
**SUPERIOR COURT OF JUSTICE**  
**(COMMERCIAL LIST)**  
**(IN BANKRUPTCY AND INSOLVENCY)**

**PROCEEDINGS COMMENCED AT**  
**TORONTO**

---

**ORDER**

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**GARFINKLE BIDERMAN LLP**  
Barristers & Solicitors  
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Toronto, Ontario M5C 2V9

Wendy Greenspoon-Soer -LSO#: 34698L  
Tel: 416-869-1234  
Email: [wggreenspoon@garfinkle.com](mailto:wggreenspoon@garfinkle.com)

Lawyers for BookJane Inc.

# **TAB 4**

Court File No. BK-25-03215064-0031  
Estate File No. 31 – 3215064

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)  
(IN BANKRUPTCY AND INSOLVENCY)**

**IN THE MATTER OF THE *BANKRUPTCY AND INSOLVENCY ACT*,  
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**AND IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A  
PROPOSAL OF BOOKJANE INC., OF THE CITY OF TORONTO, IN  
THE PROVINCE OF ONTARIO**

**SERVICE LIST**

**(As at May 14, 2025)**

Date: May 14, 2025

**GARFINKLE BIDERMAN LLP**  
Barristers & Solicitors  
1 Adelaide Street East, Suite 801  
Toronto, Ontario M5C 2V9

**Wendy Greenspoon-Soer** – LSO#: 34698L  
Tel: 416-869-1234  
Email: [wgreenspoon@garfinkle.com](mailto:wgreenspoon@garfinkle.com)

Lawyers BookJane Inc.

TO: **Albert Gelman Inc.**  
250 Ferrand Drive, Suite 403  
Toronto ON M3C 3G8

Bryan Gelman  
Tel: 416-504-1650  
[bgelman@abertgelman.com](mailto:bgelman@abertgelman.com)

Adam Zeldin  
[azeldin@albertgelman.com](mailto:azeldin@albertgelman.com)

Proposal Trustee

AND TO: **Capstone Legal**  
1370 Hurontario Street  
Mississauga, ON L5G 3H4

Danny Nunes  
Tel: 416-414-3311  
[dn@capstonelegal.ca](mailto:dn@capstonelegal.ca)

Lawyers for Albert Gelman Inc.,  
in its capacity as Proposal Trustee

AND TO: **McCarthy Tétrault LLP**  
Suite 5300, TD Bank Tower  
Box 48, 66 Wellington Street West  
Toronto ON M5K 1E6

Saneea Tanvir  
T: 416-601-8181  
[stanvir@mccarthy.ca](mailto:stanvir@mccarthy.ca)

Adil Akbar  
Tel: 416-601-7920  
[adilakbar@mccarthy.ca](mailto:adilakbar@mccarthy.ca)

Rami Chalabi  
Tel: 416-601-8125  
[rchalabi@mccarthy.ca](mailto:rchalabi@mccarthy.ca)

Lawyers for AYAL Capital Advisors  
Elite Fund LP, Amica Senior Lifestyles  
Trust, KB Capital Management Inc., and  
Zahra Salisbury

AND TO: **John MacDonald**  
201 Moore Avenue  
Toronto ON M4T 1V8  
[johnamacdona@outlook.com](mailto:johnamacdona@outlook.com)

Creditor

AND TO: **A&A Numeric Solutions**  
3 20 Wakunda Pl  
Toronto ON M4A 1A3  
[anica.chodri@gmail.com](mailto:anica.chodri@gmail.com)

Creditor

AND TO: **ABK HEALTHCARE SERVICES INC**

18 Vision Way  
Brampton ON L6P 1J1  
[info@abkhealthcare.ca](mailto:info@abkhealthcare.ca)

Creditor

AND TO: **Adequate Care Social Services Inc.**

4226 Drummond Road  
Niagara Falls ON L2E 6B9  
[admin@adequatecss.com](mailto:admin@adequatecss.com)  
Creditor

AND TO: **ADP**

PO Box 830272  
Philadelphia PA 19182 0272 USA

Creditor

AND TO: **Aircall**

44 W 28th St., 14<sup>th</sup> Floor  
New York NY 10001 USA

Creditor

AND TO: **American Express**

c/o FCT Default Solutions  
Insolvency Department  
PO Box 2514, Stn B  
London ON N6A 4G9  
Fax: (647) 439 1419  
[dsinsolvency@collectlink.com](mailto:dsinsolvency@collectlink.com)

Creditor

AND TO: **Augury Healthcare Inc.**

6D 7398 Yonge St Unit # 684  
Thornhill ON L4J 8J2  
[mkoppisch@auguryhealth.ca](mailto:mkoppisch@auguryhealth.ca)

Creditor

AND TO: **Auxilium Professional Corporation**  
121 Richmond Street West Penthouse  
Toronto ON M5H 2K1  
[sendy@auxiliumfinancial.com](mailto:sendy@auxiliumfinancial.com)

Creditor

AND TO: **Awais Shafqat**  
1737 Thames Circle  
Milton ON L6E 1Y5  
[awais@bookjane.com](mailto:awais@bookjane.com)

Creditor

AND TO: **Business Development Bank of Canada**  
82 Bay St. Suite 3700  
Toronto ON M5J 0E7  
[shane.lee@bdc.ca](mailto:shane.lee@bdc.ca)

Creditor

AND TO: **CANADA REVENUE AGENCY**  
c/o Department of Justice Canada  
Ontario Regional Office-Tax Law  
Section  
120 Adelaide Street West, Suite 400  
Toronto, Ontario M2N 6P4

**Diane H. A. Winters**  
Tel: 647-256-7459  
Email: [diane.winters@justice.gc.ca](mailto:diane.winters@justice.gc.ca)

**Pat Confalone**  
[Pat.confalone@cra-arc.gc.ca](mailto:Pat.confalone@cra-arc.gc.ca)

AND TO: **INSOLVENCY UNIT, ONTARIO**  
**MINISTRY OF FINANCE**  
6th Floor, 22 King Street West  
Oshawa, ON L1H 8H5

**Leslie Crawford**  
[Leslie.crawford@ontario.com](mailto:Leslie.crawford@ontario.com)  
[Insolvency.Unit@ontario.ca](mailto:Insolvency.Unit@ontario.ca)

AND TO: **OFFICE OF THE  
SUPERINTENDENT IN  
BANKRUPTCY**  
151 Yonge Street, 4<sup>th</sup> Floor  
Toronto, ON M5C 2W7

Email: [osbservice-bsfservice@ised-isde.gc.ca](mailto:osbservice-bsfservice@ised-isde.gc.ca)

AND TO: **MINISTRY OF FINANCE**  
77 Bay Street, 11<sup>th</sup> Floor  
Toronto, ON M5G 2C8

**Kevin O'Hara**  
Tel: 46-327-8463  
Email: [Kevin.Ohara@ontario.ca](mailto:Kevin.Ohara@ontario.ca)

Court File No. BK-25-03215064-0031  
Estate File No. 31 – 3215064

**IN THE MATTER OF THE *BANKRUPTCY AND INSOLVENCY ACT*, R.S.C. 1985, c. B-3, AS AMENDED  
AND IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF BOOKJANE INC., OF THE CITY  
OF TORONTO, IN THE PROVINCE OF ONTARIO**

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***ONTARIO*  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)  
IN BANKRUPTCY AND INSOLVENCY  
PROCEEDINGS COMMENCED AT  
TORONTO**

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**SERVICE LIST**

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**GARFINKLE BIDERMAN LLP**  
Barristers & Solicitors  
1 Adelaide Street East, Suite 801  
Toronto, Ontario M5C 2V9

**Wendy Greenspoon-Soer – LSO#:**  
34698L  
Tel: 416-869-1234  
Email: [wggreenspoon@garfinkle.com](mailto:wggreenspoon@garfinkle.com)

Lawyers for BookJane Inc.

Court File No. BK-25-03215064-0031  
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**IN THE MATTER OF THE *BANKRUPTCY AND INSOLVENCY ACT*, R.S.C. 1985, c. B-3, AS AMENDED  
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**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)  
(IN BANKRUPTCY AND INSOLVENCY)**

PROCEEDINGS COMMENCED AT TORONTO

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**MOTION RECORD**

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**GARFINKLE BIDERMAN LLP**  
Barristers & Solicitors  
1 Adelaide Street East, Suite 801  
Toronto, Ontario  
M5C 2V9

**Wendy Greenspoon-Soer** LSO#: 34698L  
[wgreenspoon@garfinkle.com](mailto:wgreenspoon@garfinkle.com)  
Tel: 416-869-7615

Lawyers for BookJane Inc.

**File Number: 14731-001**

RCP-F 4C (September 1, 2020)