

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

IN BANKRUPTCY AND INSOLVENCY

**IN THE MATTER OF THE PROPOSAL OF 1482241 ONTARIO LIMITED,
OF THE CITY OF TORONTO, IN THE PROVINCE OF ONTARIO**

**MOTION RECORD
(Returnable May 24, 2019)**

May 23, 2019

AIRD & BERLIS LLP
Barristers and Solicitors
Brookfield Place
Suite 1800, Box 754
181 Bay Street
Toronto, ON M5J 2T9

Steven L. Graff (LSUC # 31871V)
Tel: (416) 865-7726
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Miranda Spence (LSUC # 60621M)
Tel: (416) 865-3414
Fax: (416) 863-1515
Email: mspence@airdberlis.com

*Lawyers for Crowe Soberman Inc. in its
capacity as the proposal trustee of 1482241
Ontario Limited*

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D	Appendix "D"	Affidavit of Fees of Hans Rizzari sworn May 23, 2019

TAB 1

Court File No. 31-2303814
Estate No. 31-2303814

**ONTARIO
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**IN THE MATTER OF THE PROPOSAL OF 1482241 ONTARIO LIMITED,
OF THE CITY OF TORONTO, IN THE PROVINCE OF ONTARIO**

**SUPPLEMENTAL REPORT TO THE
EIGHTH REPORT OF THE PROPOSAL TRUSTEE**

MAY 23, 2019

CROWE SOBERMAN INC.
Licensed Insolvency Trustee
2 St Clair Avenue East, Suite 1200
Toronto, Ontario, M4T 2T5

Telephone: 416.929.2500
Fax: 416.929.2555

Court File No. 31-2303814
Estate No. 31-2303814

**ONTARIO
SUPERIOR COURT OF JUSTICE
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IN BANKRUPTCY AND INSOLVENCY

**IN THE MATTER OF THE PROPOSAL OF 1482241 ONTARIO LIMITED,
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OF THE PROPOSAL TRUSTEE**

MAY 23, 2019

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- A. Letter from McCague Borlack LLP to Aird & Berlis LLP dated May 14, 2019
- B. Letter from Aird & Berlis LLP to McCague Borlack LLP dated May 22, 2019
- C. Fee Affidavit of Aird & Berlis LLP sworn May 22, 2019
- D. Fee Affidavit of Hans Rizarri sworn May 23, 2019

Court File No. 31-2303814
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SUPERIOR COURT OF JUSTICE
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IN BANKRUPTCY AND INSOLVENCY

**IN THE MATTER OF THE PROPOSAL OF 1482241 ONTARIO LIMITED,
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**SUPPLEMENTAL REPORT TO THE
EIGHTH REPORT OF THE PROPOSAL TRUSTEE**

MAY 23, 2019

INTRODUCTION

1. This report (the “**Supplement to the Eighth Report**”) is filed by Crowe Soberman Inc., in its capacity as the Proposal Trustee for the Company. Unless otherwise noted, the defined terms used in this Supplement to the Eighth Report have the same meaning ascribed to them as in the First Report through Eighth Report and the Supplemental Reports thereto.

PURPOSE

2. The purpose of this supplemental report is to provide the Court with additional information since the Eighth Report was filed, as follows:
 - (a) Letter dated May 14, 2019, received from McCague Borlack LLP, Barristers & Solicitors, with respect to the Debtor’s position on the proposed interim dividends and distribution to the Debtor. A copy of the letter is attached hereto as Appendix “A”.
 - (b) Response letter from Aird & Berlis LLP to McCague Borlack LLP, dated May 23, 2019, attached hereto as Appendix “B”.
 - (c) Fee Affidavit of Aird & Berlis LLP sworn May 22, 2019 with accounts for the period November 27, 2018 to May 15, 2019, attached hereto as Appendix “C”.
 - (d) Fee Affidavit of Hans Rizarri, LIT sworn May 23, 2019, and Trustee’s time summary from November 21, 2018 to May 14, 2019, attached hereto as Appendix “D”.

All of which is respectfully submitted this 23rd day of May, 2019.

A handwritten signature in black ink, appearing to read "Crowe Soberman Inc." in a stylized, cursive font.

CROWE SOBERMAN INC.

Trustee acting under a Notice of Intention to Make a Proposal for
1482241 Ontario Limited, and not in its personal capacity

32984033.2

Tab A

APPENDIX

‘A’

McCague Borlack

Barristers & Solicitors

LLP

Eric Turkienicz
Direct Line: 416-860-3895
Email: eturkienicz@mccagueborlack.com

5
May 14, 2019

Via E-mail: mspence@airdberlis.com

Miranda Spence
Aird & Berlis LLP
181 Bay Street, Suite 1800
Toronto, Ontario
M5J 2T9

Via E-mail: hans.rizarri@crowesoberman.com

Hans Rizarri
Crowe Soberman LLP
2 St. Clair Avenue East, Suite 1100
Toronto, Ontario
M4T 2T5

Dear Ms. Spence and Mr. Rizarri:

Re: Insolvency of 1482241 Ontario Limited
Our File No.: 5345.0001

I am writing to advise of my client's position with respect to the proposed interim dividends and distribution to debtor. For greater certainty, this response relates to the version dated as at March 27, 2019 and which was provided to me during our meeting on April 5, 2019. It further addresses a recently received Proof of Claim from Neelofar Ahmadi

- 1) Clear Custom Brokers: The debtor confirms that all outstanding matters with this potential creditor have been settled with no funds to be paid to the creditor. My office will be arranging the exchange of mutually agreeable releases. To the extent that you require the release to include any specific language relating to the insolvency, please advise.
- 2) Allevio Clinic #1: The debtor understands that it is the trustee's intention to disallow \$201,903.98 from the total \$486,050.06 claimed by Allevio and that, in the event that Allevio does not launch a successful objection to that disallowance, the disallowed funds could become available for further distribution at a later date.
- 3) Disputed creditors, namely:
 - a. Daikin Applied Canada Inc. - \$12,353.69
 - b. Devry Smith LLP - \$128,153.49
 - c. GDI Services Canada LP - \$95,746.42
 - d. North York Family Physicians Holdings - \$46,442.42

- e. Qualified Elevator Repair - \$18,247.23
- f. Rogers - \$871.56
- g. YYZ Plumbing - \$17,960.20
- h. Allevio – balance of \$284,126.08

The creditor intends to comply with the protocol established by Justice Hainey and challenge some or all of these claims upon allowance of same by the trustee. Once the trustee has provided written notice of its intention to allow those claims, the debtor will identify by responding letter those allowed claims with which it objects and the stated reasons why and potentially litigate those matters with the creditors directly as part of this proceeding. It is the debtor's understanding that the trustee and its counsel will not likely be involved in any subsequent litigation of the objection and will instead be responsible only for ultimately distributing any funds found owing by the court out of the trust monies held back from this interim distribution.

- 4) Fire Code Violation fine - \$15,000: It is the debtor's position that this fine was incurred during the time when Avison Young was in exclusive management of the building. The fine apparently relates to the fire alarms being inoperative at the time of a fire inspection. This is a failure of Avison Young and should not be borne by the debtor.
- 5) First and Second Mortgage Settlement – The debtor acknowledges that the first and second mortgagees are to be paid \$25,000 each out of the amount held in trust, pursuant to settlement agreements reached previously.
- 6) Blaney (D. Ullman) invoices x2 - \$165,133.53 total: It is the debtor's position that these amounts should not be distributed to Blaney McMurtry LLP for the following reasons:
 - a. The debtor has not been provided with copies of the referenced invoices, despite requests;
 - b. Neither the trustee nor its counsel have received copies of the referenced invoices or reviewed them to determine that they reflect amounts incurred solely as part of these proceedings and not for other matters being handled for Mr. Checroune personally or his other companies; and
 - c. The amounts listed are excessive, particularly in light of past amounts paid to Blaney McMurtry LLP.
- 7) Blaney (D. Ullman) time to Mar. 27, 2019 - \$28,250.00: The debtor has recently been provided with an invoice from Blaney McMurtry LLP dated March 31, 2019. It is the debtor's position that this amount should not be distributed to Blaney McMurtry LLP for the following reasons:
 - a. The invoice provided lists a total amount due of \$25,272.87 inclusive of HST. The debtor is unsure why a higher amount was listed in the interim distribution sheer;
 - b. David Ullman has two stated hourly rates with the majority of his time being assigned to the higher rate. The debtor is unsure as to why this occurred;
 - c. The dockets include numerous entries which appear to relate to other matters unrelated to the debtor's insolvency proceedings and which should not be paid as part of this distribution;
 - d. The time spent is, at certain places, excessive with respect to the complexity of the task and/or the time actually spent by the timekeeper; and

- e. The dockets date back to January 11, 2019. In light of the listing of another invoice dated January 31, 2019 on the proposed distribution table, the debtor is concerned that amounts have been listed twice on two separate invoices.

Note that it is also the debtor's position that the stated issues with the March 31, 2019 invoice further raise their concern with all other amounts claimed by Blaney McMurtry LLP in these proceedings.

- 8) Aird & Berlis and Crowe Soberman invoices/time: the debtor wishes to review the timesheets and invoices for these parties prior to providing a position on whether it intends to object to those payments.
- 9) New proof of claim filed by Neelofar Ahmadi: the decision by the Honourable Justice Chiapetta released January 24, 2019 explicitly stated that Ms. Ahmadi did not have a claim against the debtor itself and that she simply owned 20% of the shares of the debtor. A shareholder is not a creditor of a corporation, particularly where the corporation is still active and has not been wound up. The decision of whether to distribute any cash assets to its shareholders is a decision to be made by the corporation alone and there is no reason for a trustee to directly distribute any funds to shareholders or to hold back any funds for that purpose. Ms. Ahmadi has no judgment against the debtor or its principals and the holdback or distribution of funds at this time would be, in effect, execution before judgment.

Further, the decision by Justice Chiapetta explicitly recognized the existence of the June 22 Agreement between Ahmadi and 148 that Ahmadi not be entitled to any profits of 148 until 100% of Mr. Chercoune's shares were purchased by Ahmadi. As the deal did not close, there is no entitlement to profits and any distribution from the estate would contradict that finding by His Honour.

The debtor strenuously objects to the further holdback and states that the proof filed by Ms. Ahmadi is an abuse of process in light of the decision stating that she had not claim against the debtor as part of these proceedings.

Irrespective of the potential objections which may be raised by the debtor, it is understood that the trustee intends to hold back sufficient funds from the current trust balance to ensure that all non-deferred and non-contingent claimants, with the exception of the new Ahmadi claim, are able to be paid 100% of their claims. Even if the debtor is unsuccessful in each and every objection, the trustee will be able to comply with its duties and distribute funds as necessary.

As well, it is understood that \$103,823.60 will be further held back to account for potential future fees incurred by Crowe Soberman and Aird & Berlis related to the distribution of those funds and the wrapping up of this proposal. Given those parties' likely reduced role in any objections filed by the debtor, there is sufficient security in place to protect their fees (and in fact there may well be a surplus remaining).

The Ahmadi claim ought to be denied by the trustee for the reasons set out above. In that case, there would be no prejudice to the immediate interim distribution of the \$2,800,000 surplus accounted for by the trustee. All parties can be assured that their claims are capable of being

paid, even with the possibility of objections. The debtor therefore respectfully requests that this distribution be made at this time and that we proceed with the protocol already in place for the remaining claimants.

Kindly advise of your position with respect to this request at your earliest opportunity.

Yours very truly,



Eric Turkienicz
ET

Tab B

APPENDIX

‘B’

AIRD BERLIS

Miranda Spence
Direct: 416.865.3414
E-mail: mspence@airdberliss.com

May 23, 2019

BY EMAIL

McCague Borlack LLP
130 King Street West
Suite 2700, P.O. Box 136
Toronto, ON M5X 1C7

Attention: Eric Turkienicz

Dear Sir:

Re: In the matter of the proposal of 1482241 Ontario Limited (the "Debtor")

We have reviewed your letter dated May 14, 2019, regarding the proposed interim dividend and distribution to the Debtor, and respond as follows.

1. As the Clear Customs Brokers Ltd. ("Clear Customs") action has been stayed by the insolvency proceeding, and Clear Customs has filed a proof of claim, the settlement will need to include a withdrawal by Clear Customs of their proof of claim.
2. Your understanding of the Proposal Trustee's intentions with regard to the proof of claim filed by Allevio Clinic is correct. The Proposal Trustee has not yet issued a notice of disallowance in this regard to Allevio Clinic.
3. Thank you for advising of the Debtor's intentions with regard to these claims. We agree that, consistent with the approach taken to the mini-trial to decide the Property Claim, the Proposal Trustee will have limited involvement in seeking to have these claims adjudicated by the Court.
4. The Fire Code Violation was issued on January 4, 2018, against both the Debtor, as owner, and Avison Young Real Estate Management Services ("Avison Young"), as property manager. A review of the disclosure provided by Toronto Fire Services, which has been provided to you, reveals, among other things, that the inspection that gave rise to the Fire Code Violation was prompted by the emergency incident reports dated December 31, 2017, arising from the rupture of the boiler pipe. Your client will recall that, immediately upon Avison Young assuming management of the property on November 13, 2017, and through December 2017, there were numerous incidents of flooding arising from the poor condition of the building and in particular, its boiler. We understand that the flooding caused the fire alarm system to be triggered, leading to Toronto Fire Services attending at the premises.

The disclosure further reveals that, although Avison Young was the property manager, Mr. Checroune was continuously on site and meeting with fire inspectors and contractors. The emergency incident report bearing incident number F17134174

specifically identifies that Mr. Checroune was personally attempting to reset the fire alarm panel, despite having previously been directed to have it serviced by the alarm company. It also reveals that Avison Young took immediate steps to remedy the issues identified by Toronto Fire Services (i.e. the same day that the Fire Code Violation was issued).

In the circumstances, it is our view that the fine associated with the Fire Code Violation ought to be paid from the sale proceeds currently held in trust. We further note that the total fine (negotiated by our office, with input from the Debtor's prior counsel) is only \$15,000. We would ask that your client agree that this amount may be paid from the sale proceeds.

5. Thank you for your confirmation regarding the first and second mortgagees. We intend to seek an order permitting these amounts to be distributed at the case conference scheduled for Friday, March 24, 2019.
- 6./7. The Trustee does not propose to take a position with regard to any dispute as between the Debtor and its former counsel with regard to fees.
8. Consistent with past practice, the Proposal Trustee and its counsel will submit affidavits of fees to be reviewed by the parties and the Court as part of seeking any Order to distribute amounts to pay these fees.
9. We have your position regarding the new claim filed by Neelofer Ahmadi and Jamshid Hussaini. We propose to seek the direction of the Court regarding the appropriate forum within which to address this issue.

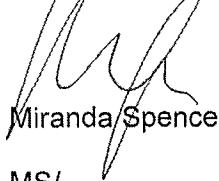
We note that any interim distribution to the Debtor will depend upon the related parties to the Debtor who have filed proofs of claim agreeing to defer their claims.

We further note that the proposed distribution of \$2,800,000 referred to in the Eighth Report must be reduced by the sum of \$82,610, representing the monthly operating expense for April, which was distributed after April 5, 2019. The Proposal Trustee has not yet made any distribution to the Debtor for operating expenses for May.

Please be advised that we intend to put your letter and our response herein before the Court at Friday's case conference, by way of a supplementary report.

Yours truly,

AIRD & BERLIS LLP



Miranda Spence

MS/

c. Hans Rizarri, Graeme Hamilton

AIRD BERLIS

Tab C

APPENDIX

‘C’

Court File No. 31-2303814
Estate No. 31-2303814

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

IN BANKRUPTCY AND INSOLVENCY

**IN THE MATTER OF THE PROPOSAL OF 1482241 ONTARIO LIMITED,
OF THE CITY OF TORONTO, IN THE PROVINCE OF ONTARIO**

**AFFIDAVIT OF STEVEN L. GRAFF
(sworn May 22nd, 2019)**

I, **STEVEN L. GRAFF**, of the City of Toronto, in the Province of Ontario, **MAKE OATH AND SAY AS FOLLOWS:**

1. I am a lawyer at Aird & Berlis LLP and, as such, I have knowledge of the matters to which I hereinafter depose. Aird & Berlis LLP is acting as counsel for Crowe Soberman Inc. in its capacity as proposal trustee of 1482241 Ontario Limited (in such capacity, the “**Proposal Trustee**”).
2. Aird & Berlis LLP has prepared statements of account in connection with its mandate as counsel to the **Proposal Trustee**, detailing its services rendered and disbursements incurred, namely:
 - (a) an account dated December 31, 2018 in the amount of \$15,397.81 in respect of the period from November 27, 2018 to December 19, 2018;
 - (b) an account dated March 18, 2019 in the amount of \$15,101.72 in respect of the period from January 3, 2019 to March 12, 2019;
 - (c) an account dated April 29, 2019 in the amount of \$3,897.43 in respect of the period from March 11, 2019 to March 29, 2019; and

(d) an account dated May 21, 2019 in the amount of \$9,631.28 in respect of the period from April 1, 2019 to May 15, 2019.

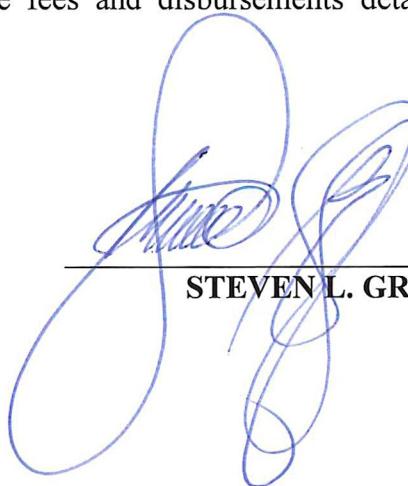
(the “**Statement of Account**”). Attached hereto and marked as **Exhibit “A”** to this Affidavit is a copy of the Statements of Account. The average hourly rate of Aird & Berlis LLP is \$334.53.

3. Attached hereto and marked as **Exhibit “B”** to this Affidavit is a chart detailing the lawyers, law clerks and articling students who have worked on this matter.
4. This Affidavit is made in support of a motion to, *inter alia*, approve the attached accounts of Aird & Berlis LLP and the fees and disbursements detailed therein, and for no improper purpose whatsoever.

SWORN before me at the City of)
Toronto, in the Province of Ontario)
this 22nd day of May, 2019)

A commissioner, etc.

Simone Daniella Hodgson, a Commissioner, etc.,
Province of Ontario, for Aird & Berlis LLP,
Barristers and Solicitors.
Expires August 18, 2021.



STEVEN L. GRAFF

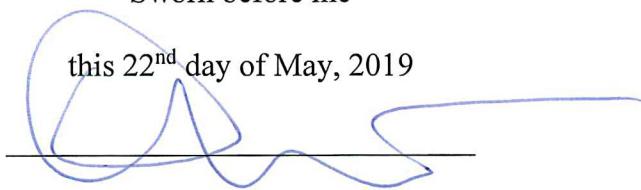
Attached is Exhibit "A"

Referred to in the

AFFIDAVIT OF STEVEN L. GRAFF

Sworn before me

this 22nd day of May, 2019


Commissioner for taking Affidavits, etc

IN ACCOUNT WITH:

AIRD BERLIS

Brookfield Place, 181 Bay Street, Suite 1800
Toronto, Ontario, Canada M5J 2T9
T 416.863.1500 F 416.863.1515
airdberlis.com

Crowe Soberman Inc.
1100-2 St. Clair Avenue East
Toronto, ON
M4T 2T5

Attention: Hans M. Rizarri

Account No.: 621217

PLEASE WRITE ACCOUNT NUMBERS
ON THE BACK OF ALL CHEQUES

File No.: 48389/141309

December 31, 2018

Re: Proposal of 1482241 Ontario Limited and 240 Duncan Mill Road

FOR PROFESSIONAL SERVICES RENDERED on your behalf throughout the period ended December 31, 2018.

LAWYER	DATE	RATE/ HOUR	TIME	VALUE	DESCRIPTION
MES	27/11/18	\$435.00	1.00	\$435.00	Telephone calls with G. Hamilton re: claims review, report for mini-trial, motion for fee approval; Exchange emails with D. Ullmann and Court re: motion for fee approval; Exchange emails with C. Mills re: mini-trial
MES	28/11/18	\$435.00	1.50	\$652.50	Discussions with G. Hamilton re: report to address value of property claim, review and consider report; Telephone call with C. Mills re: same; Telephone call with D. Ullmann re: fire violation and value of property claim
VS	29/11/18	\$395.00	0.30	\$118.50	Correspondence with M. Spence regarding update and next steps
MES	29/11/18	\$435.00	0.60	\$261.00	Telephone call with G. Hamilton re: mini-trial; Telephone call with G. Hamilton and C. Mills re: participation in mini-trial; Exchange emails with D. Ullmann and V. Simkic re: fire violation hearing
SJ	30/11/18	\$305.00	3.50	\$1,067.50	Draft letters to tenants
MES	30/11/18	\$435.00	0.50	\$217.50	Exchange emails with S. John, A. Silver re: letters to tenants re:

LAWYER	DATE	RATE/HOUR	TIME	VALUE	DESCRIPTION
					security deposit adjustments
VS	03/12/18	\$395.00	0.10	\$39.50	Correspondence with M. Spence regarding next steps
VS	03/12/18	\$395.00	0.30	\$118.50	Email to opposing counsel regarding next steps
MES	03/12/18	\$435.00	0.20	\$87.00	Telephone call with G. Hamilton re: December 4 hearing
MES	04/12/18	\$435.00	1.30	\$565.50	Attend at court to address mini-trial re: appeal of disallowance of property claim
VS	05/12/18	\$395.00	0.50	\$197.50	Correspondence with client and M. Spence regarding next steps; Preparing for Court; Correspondence with D. Ullmann regarding Court attendance
MES	05/12/18	\$435.00	0.50	\$217.50	Telephone call with G. Hamilton re: various issues to be addressed; Exchange emails with V. Simkic, D. Ullmann, A. Teodorescu re: settlement conference on fire violation issue
VS	06/12/18	\$395.00	2.80	\$1,106.00	Preparing for Court attendance, Correspondence with G. Hamilton regarding same; Correspondence with M. Spence regarding same; Attend Crown Pre-Trial; Return to office; Follow-up with M. Spence regarding update; Consider strategy regarding next steps
MES	06/12/18	\$435.00	0.50	\$217.50	Discussions with V. Simkic re: settlement meeting re: fire violation notice; Receive emails from G. Hamilton and H. Rizarri re: December payment
VS	07/12/18	\$395.00	0.80	\$316.00	Begin drafting, preparing, reviewing, revising and editing reporting email
VS	07/12/18	\$395.00	0.90	\$355.50	Continue drafting, preparing, reviewing, revising and editing reporting email

LAWYER	DATE	RATE/HOUR	TIME	VALUE	DESCRIPTION
MES	07/12/18	\$435.00	0.30	\$130.50	Telephone call with G. Hamilton re: outstanding issues to be addressed, Receive email from V. Simkic re: outcome of settlement conference
VS	09/12/18	\$395.00	0.10	\$39.50	Correspondence with M. Spence regarding instructions
MES	09/12/18	\$435.00	0.60	\$261.00	Instruct S. John re: materials for fee approval motion; Exchange emails with V. Simkic re: reporting on fire violation issue; Email to A. Silver re: closing report; Email to Allevio requesting response
SJ	10/12/18	\$305.00	1.20	\$366.00	Draft notice of motion and draft order
VS	10/12/18	\$395.00	0.40	\$158.00	Finalize and send report to client
MES	10/12/18	\$435.00	0.50	\$217.50	Exchange emails with V. Simkic, G. Hamilton re: fire violation notice; Instruct S. John re: motion record; Arrange for wire transfer; Telephone call with G. Hamilton
SJ	11/12/18	\$305.00	1.50	\$457.50	Draft notice of motion and order
VS	11/12/18	\$395.00	0.20	\$79.00	Confirm instructions; Consider strategy regarding next steps
MES	11/12/18	\$435.00	1.00	\$435.00	Exchange emails with D. Ullmann re: motion for approval of fees; Review and revise notice of motion, draft order and seventh report of the proposal trustee; Instructions to S. John re: finalizing report and arranging for service of same
SJ	12/12/18	\$305.00	2.20	\$671.00	Instruct D. McMillen re motion record; Revise motion materials; Instruct J. McLean re motion record
VS	12/12/18	\$395.00	0.10	\$39.50	Emails with client regarding update and confirmation of instructions

LAWYER	DATE	RATE/HOUR	TIME	VALUE	DESCRIPTION
MES	12/12/18	\$435.00	1.00	\$435.00	Final review of motion record; Exchange emails with S. John re: service and filing of same; Exchange emails with G. Hamilton re: service and filing of same; Exchange emails with I. Aversa re: reporting letter on transaction
MES	13/12/18	\$435.00	0.20	\$87.00	Exchange emails with S. John re: filing of 7th Report
PW	13/12/18	\$180.00	0.60	\$108.00	Filed Motion Record for December 19, 2018
VS	14/12/18	\$395.00	3.80	\$1,501.00	Prepare for Court attendance; Attend Court regarding fire charges; Return from Court
VS	17/12/18	\$395.00	0.20	\$79.00	Review notes from Court attendance; Email to counsel regarding update from Court attendance
MES	17/12/18	\$435.00	0.70	\$304.50	Telephone call with C. Mills; Receive email from D. Ullmann re: opposition to fees motion; Telephone calls with G. Hamilton, H. Rizarri and S. Graff re: same; Exchange emails with H. Rizarri re: same
SJ	18/12/18	\$305.00	0.20	\$61.00	Revise order; Draft reporting letter re closing documents
MES	18/12/18	\$435.00	1.10	\$478.50	Instruct S. John re: preparation of draft orders and reporting letter on sale transaction; Telephone calls and exchange of emails with D. Ullmann re: position on motion; Telephone calls and exchange of emails with H. Rizarri and G. Hamilton re: position on motion; Receive email from C. Mills
SLG	19/12/18	\$795.00	0.20	\$159.00	Discussion with M. Spence re outcome of motion
SJ	19/12/18	\$305.00	1.00	\$305.00	Draft letter and assemble enclosures

AIRD & BERLIS LLP
PAGE 5 OF ACCOUNT NO. 621217

LAWYER	DATE	RATE/HOUR	TIME	VALUE	DESCRIPTION
MES	19/12/18	\$435.00	2.50	\$1,087.50	Prepare for and attend at Court to address motion for fee approval; Telephone calls with H. Rizarri and G. Hamilton re: same; Receive emails from G. Hamilton re: correspondence with debtor
TOTAL:			34.90	\$13,432.50	

OUR FEE HST at 13%	\$13,432.50
	\$1,746.23

DISBURSEMENTS

COST INCURRED ON YOUR BEHALF AS AN AGENT

Wire Charges	\$15.00
Court Fees	\$50.00
 Subject to HST	
Total Agency Costs	\$65.00
Conference Calls	\$4.06
Taxi Charges	\$9.29
Photocopies/Scanning	\$110.75
Binding and Tabs	\$12.25
 Total Disbursements	\$136.35
HST at 13%	\$17.73
 AMOUNT NOW DUE	 \$15,397.81

THIS IS OUR ACCOUNT HEREIN
Aird & Berlis LLP

Steven L. Graff
E.&O.E.

PAYMENT OF THIS ACCOUNT IS DUE ON RECEIPT

IN ACCORDANCE WITH THE SOLICITORS ACT, ONTARIO, INTEREST WILL BE CHARGED AT THE RATE OF 1.5% PER ANNUM ON UNPAID AMOUNTS CALCULATED FROM A DATE THAT IS ONE MONTH AFTER THIS ACCOUNT IS DELIVERED.

GST / HST Registration # 12184 6539 RT0001

NOTE: This account may be paid by wire transfer in Canadian funds to our account at The Toronto-Dominion Bank, TD Centre, 55 King Street West, Toronto, Ontario, M5K 1A2. Account number 5221621, Transit number 10202, Swift Code TDOMCATTOR. Please include the account number as reference.

IN ACCOUNT WITH:

AIRD BERLIS

Brookfield Place, 181 Bay Street, Suite 1800
Toronto, Ontario, Canada M5J 2T9
T 416.863.1500 F 416.863.1515
airdberris.com

Crowe Soberman Inc.
1100-2 St. Clair Avenue East
Toronto, ON M4T 2T5

Attention: Hans M. Rizarri

Account No.: 627658

PLEASE WRITE ACCOUNT NUMBERS
ON THE BACK OF ALL CHEQUES

File No.: 48389/141309

March 18, 2019

Re: Proposal of 1482241 Ontario Limited and 240 Duncan Mill Road

FOR PROFESSIONAL SERVICES RENDERED on your behalf throughout the period ended March 12, 2019

LAWYER	DATE	RATE/ HOUR	TIME	VALUE	DESCRIPTION
MES	03/01/19	\$475.00	0.40	\$190.00	Correspondence with Court re: Justice Hainey's decision on motion to discharge proposal trustee; Receive email from counsel for Allevio re: claim
MES	07/01/19	\$475.00	0.70	\$332.50	Exchange emails and telephone call with D. Ullmann re: proposed meeting to review fees; Telephone call and receipt of emails from G. Hamilton re: outstanding matters
MES	08/01/19	\$475.00	0.10	\$47.50	Receive email from D. Ullmann
MES	09/01/19	\$475.00	0.20	\$95.00	Telephone call with H. Rizarri and G. Hamilton re: meeting to address fees
MES	10/01/19	\$475.00	0.30	\$142.50	Telephone call with G. Hamilton re: outstanding matters; Exchange emails with D. Ullmann re: correspondence with Court
MES	11/01/19	\$475.00	0.30	\$142.50	Telephone call and exchange of emails with G. Hamilton re: January operating expenses
MES	13/01/19	\$475.00	0.30	\$142.50	Exchange emails with E. Fan re: potential motion by Janodee; Receive and review emails from H. Rizarri and D. Ullmann re: fees

LAWYER	DATE	RATE/HOUR	TIME	VALUE	DESCRIPTION
MES	14/01/19	\$475.00	0.50	\$237.50	Arrange for wire transfer to debtor; Receive and review emails re: meeting to discuss fees
MES	15/01/19	\$475.00	0.50	\$237.50	Exchange emails and telephone calls with D. Ullmann and G. Hamilton re: fee approval motion and revise orders
VS	16/01/19	\$425.00	0.20	\$85.00	Correspondence with M. Spence regarding next steps
MES	16/01/19	\$475.00	2.20	\$1,045.00	Attend at court for fee approval motion; Arrange for wires
VS	22/01/19	\$425.00	0.40	\$170.00	Consider strategy regarding next steps; Email to M. Spence regarding same; Email to client and opposing counsel regarding same; Confirm instructions
MES	22/01/19	\$475.00	1.20	\$570.00	Telephone calls with D. Ullmann, G. Benchetrit, G. Hamilton re: settlement of First Mortgagees' claim; Telephone call with G. Hamilton re: outstanding issues; Letter to G. Hamilton providing closing documents; Instruct V. Simkic and review emails re: settlement of fire violation claim
MES	23/01/19	\$475.00	0.20	\$95.00	Exchange emails with H. Rizarri and G. Hamilton re: call to discuss closing matters
SLG	24/01/19	\$825.00	0.40	\$330.00	Telephone call with H. Rizarri, G. Hamilton and M. Spence re claim
SLG	24/01/19	\$825.00	0.40	\$330.00	Review reasons for judgment on claim of Neelofa
MES	24/01/19	\$475.00	1.50	\$712.50	Receive and review decision of Chiapetta J. re: property claim appeal; Review and consider security deposit issues and review relevant documents; Telephone call with H. Rizarri, G. Hamilton, S. Graff re: same; Consult with V. Simkic re: fire violation issue and voicemail to D. Ullmann re: same

LAWYER	DATE	RATE/HOUR	TIME	VALUE	DESCRIPTION
VS	25/01/19	\$425.00	3.80	\$1,615.00	Prepare for Court Attendance; Attend Court; Resolve matter by way of guilty plea in exchange for a \$10,000.00 fine; Reporting email to client and M. Spence regarding same
MES	25/01/19	\$475.00	0.20	\$95.00	Receive and review emails from V. Simkic re: settlement of fire violation issue
VS	28/01/19	\$425.00	0.20	\$85.00	Emails with client regarding Court attendance
MES	28/01/19	\$475.00	0.40	\$190.00	Telephone call with G. Hamilton re: letters to tenants; Receive and review emails re: fire violation notice
MES	29/01/19	\$475.00	0.10	\$47.50	Receive email from H. Rizarri re: request for funds
MES	30/01/19	\$475.00	1.00	\$475.00	Telephone calls with D. Ullmann and G. Hamilton re: disbursement of funds, security deposit issue, potential appeal; Email to G. Hamilton and H. Rizarri re: D. Ullmann requests; Finalize letters to tenants
MES	31/01/19	\$475.00	0.70	\$332.50	Issue letters to tenants; Receive response from H. Katirai and email to G. Hamilton re: same; Exchange emails with D. Ullmann's office re: court date; Receive email re: February operating expenses
MES	01/02/19	\$475.00	0.20	\$95.00	Receive notice of appeal from C. Mills and email to H. Rizarri and G. Hamilton re: same
MES	04/02/19	\$475.00	0.50	\$237.50	Discussion with G. Hamilton re: status of various issues; Receive email re: payment of February expenses; Review and consider response of tenant to request for security deposit information
MES	05/02/19	\$475.00	0.20	\$95.00	Arrange for wire transfer to 148 for February operating expenses; Instruct S. John re: security deposit analysis
SJ	08/02/19	\$340.00	0.50	\$170.00	Prepare and update client chart re tenant responses

LAWYER	DATE	RATE/HOUR	TIME	VALUE	DESCRIPTION
MES	11/02/19	\$475.00	0.70	\$332.50	Telephone call with D. Ullmann re: 9:30 appointment to address motion to discharge proposal trustee; Exchange emails with D. Ullmann and court re: same; Email to service list; Emails to H. Rizarri, G. Hamilton, G. Benchetrit re: same
MES	12/02/19	\$475.00	1.00	\$475.00	Exchange emails with L. Keown re: decision of Justice Chiappetta; Telephone call with new counsel for Hussaini parties; Telephone call and exchange of emails with G. Hamilton re: 9:30 attendance and next steps; Exchange emails with D. Ullmann re: 9:30 attendance
MES	13/02/19	\$475.00	1.60	\$760.00	Attend court for 9:30 attendance to address payment of funds to debtor; Telephone call with G. Hamilton re: same
MES	14/02/19	\$475.00	0.20	\$95.00	Telephone call with G. Hamilton re: outstanding balance and addressing motion to pay funds to debtor
MES	15/02/19	\$475.00	0.30	\$142.50	Call with tenant re security deposit; Emails re: balance in trust
MES	19/02/19	\$475.00	0.50	\$237.50	Telephone call with D. Ullmann re: proposed form of order if no stay; Telephone call with G. Hamilton re: updates
MES	20/02/19	\$475.00	0.10	\$47.50	Receive email from E. Fan re: payment of costs award
MES	21/02/19	\$475.00	0.50	\$237.50	Receive and review email from D. Ullmann re: proposal to pay funds to debtor; Exchange emails with G. Hamilton; Telephone call with G. Hamilton and review claims register
MES	22/02/19	\$475.00	0.60	\$285.00	Telephone call with D. Ullmann re: order to obtain funds; Telephone call with G. Hamilton re: same; Receive message from tenant re: security deposit; Exchange emails with G. Hamilton

LAWYER	DATE	RATE/HOUR	TIME	VALUE	DESCRIPTION
MES	24/02/19	\$475.00	0.10	\$47.50	Receive email from D. Ullmann
MES	25/02/19	\$475.00	0.60	\$285.00	Telephone call with G. Hamilton re: holdback for order, conversation with tenants; Exchange emails with D. Ullmann re: same; Review proposed form of order and voicemail to D. Ullmann re: same
MES	26/02/19	\$475.00	1.50	\$712.50	Telephone calls and exchanges of emails with G. Hamilton, D. Ullmann re: form of order to address payout of funds; Consider and revise draft order; Exchange emails with H. Rizarri re: holdback
MES	27/02/19	\$475.00	0.50	\$237.50	Telephone call with D. Ullmann re: order; Telephone call with G. Hamilton re: same; Email to E. Fan re: distribution of funds; Receive email from G. Hamilton re: monthly payment to debtor
MES	28/02/19	\$475.00	0.30	\$142.50	Address wire to debtor for operating expenses
MES	06/03/19	\$475.00	0.20	\$95.00	Discussion with G. Hamilton re: status of file and debtor's request for information
MES	07/03/19	\$475.00	0.30	\$142.50	Exchange emails with H. Rizarri re: trust accounting for sale proceeds
MES	08/03/19	\$475.00	0.50	\$237.50	Telephone call with G. Hamilton re: trust funds; Receive email from D. Ullmann and telephone call with D. Ullmann re: same; Email to H. Rizarri and G. Hamilton re: call with D. Ullmann
SLG	12/03/19	\$825.00	0.20	\$165.00	Emails re position of Alain re distribution
TOTAL:			27.30	\$13,020.00	

Name	Hours	Rate	Value
Miranda E. Spence (MES)	21.20	\$475.00	\$10,070.00
Vedran Simkic (VS)	4.60	\$425.00	\$1,955.00
Steven L. Graff (SLG)	1.00	\$825.00	\$825.00
Shakaira John (SJ)	0.50	\$340.00	\$170.00
OUR FEE			\$13,020.00
HST at 13%			\$1,692.60

DISBURSEMENTS

COST INCURRED ON YOUR BEHALF AS AN AGENT

Wire Charges	\$75.00
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Subject to HST

Taxi	\$65.89
Travelling Expenses	\$58.94
Photocopies	\$29.00
Imaging/Scanning	\$31.75
Deliveries/Parss	\$84.40
Binding and Tabs	\$8.00
 Total Disbursements	 \$277.98
HST at 13%	\$36.14

AMOUNT NOW DUE

\$15,101.72

THIS IS OUR ACCOUNT HEREIN
Aird & Berlis LLP

Steven L. Graff
E.&O.E.

PAYMENT OF THIS ACCOUNT IS DUE ON RECEIPT

IN ACCORDANCE WITH THE SOLICITORS ACT, ONTARIO, INTEREST WILL BE CHARGED AT THE RATE OF 1.5% PER ANNUM ON UNPAID AMOUNTS CALCULATED FROM A DATE THAT IS ONE MONTH AFTER THIS ACCOUNT IS DELIVERED.

GST / HST Registration # 12184 6539 RT0001

NOTE: This account may be paid by wire transfer in Canadian funds to our account at The Toronto-Dominion Bank, TD Centre, 55 King Street West, Toronto, Ontario, M5K 1A2. Account number 5221521, Transit number 10202, Swift Code TDOMCATTOR. Please include the account number as reference.

35489119.1

IN ACCOUNT WITH:

AIRD BERLIS

Brookfield Place, 181 Bay Street, Suite 1800
Toronto, Ontario, Canada M5J 2T9
T 416.863.1500 F 416.863.1515
airdberlis.com

Crowe Soberman Inc.
1100-2 St. Clair Avenue East
Toronto, ON
M4T 2T5

Attention: Hans M. Rizarri

Account No.: 631188

PLEASE WRITE ACCOUNT NUMBERS
ON THE BACK OF ALL CHEQUES

File No.: 48389/141309

April 29, 2019

Re: Proposal of 1482241 Ontario Limited and 240 Duncan Mill Road

FOR PROFESSIONAL SERVICES RENDERED on your behalf throughout the period ended April 10, 2019

LAWYER	DATE	RATE/ HOUR	TIME	VALUE	DESCRIPTION
MES	11/03/19	\$475.00	0.50	\$237.50	Telephone call with G. Hamilton re: correspondence from D. Ullmann and fire violation fine; Receive and consider email from H. Rizarri re: trust ledger
MES	12/03/19	\$475.00	0.30	\$142.50	Exchange emails with H. Rizarri re: trust ledger to be provided to A. Checroune; Consider trust ledger
MES	13/03/19	\$475.00	0.50	\$237.50	Receive letter from N. Paris re: costs submissions; Exchange emails with E. Fan re: timing of payment to Janodee; Exchange emails with H. Rizarri re: trust balance
MES	14/03/19	\$475.00	0.10	\$47.50	Receive letter from M. Kestenberg re: Hussaini claim
MES	15/03/19	\$475.00	0.50	\$237.50	Exchange emails with H. Rizarri, G. Hamilton re: proposed distribution to debtor; Telephone call with H. Rizarri and G. Hamilton re: same; Email to D. Ullmann
MES	17/03/19	\$475.00	0.20	\$95.00	Exchange emails with S. Graff and respond to request from M. Kestenberg

LAWYER	DATE	RATE/HOUR	TIME	VALUE	DESCRIPTION
MES	18/03/19	\$475.00	0.20	\$95.00	Receive and respond to email from H. Rizarri re: form of order; Voicemail to D. Ullmann
MES	19/03/19	\$475.00	0.20	\$95.00	Exchange emails with H. Rizarri re: distribution to debtor
MES	20/03/19	\$475.00	0.20	\$95.00	Exchange emails with H. Rizarri re: revised proposed distribution chart
MES	21/03/19	\$475.00	0.60	\$285.00	Telephone call with H. Rizarri re: holdback for fees; Receive and review correspondence re: termination of D. Ullmann and request for invoices; Telephone call with H. Rizarri and G. Hamilton re: same
MES	22/03/19	\$475.00	0.50	\$237.50	Telephone call with G. Hamilton re: next steps; Exchange emails with G. Benchetrit and E. Fan re: motion date to address payments to mortgagees
SLG	25/03/19	\$825.00	0.10	\$82.50	Review Notice of Change
MES	25/03/19	\$475.00	0.30	\$142.50	Exchange emails with H. Rizarri re: requests and exchange voicemails with D. Ullmann
MES	26/03/19	\$475.00	0.20	\$95.00	Telephone call with D. Ullmann re: order to address payment of funds
SJ	27/03/19	\$340.00	1.50	\$510.00	Review motion materials in file; Prepare draft order re proposed funds
MES	27/03/19	\$475.00	0.20	\$95.00	Instruct S. John re: drafting orders for payment of funds to mortgagees
SJ	28/03/19	\$340.00	0.50	\$170.00	Review motion materials in file; Prepare draft order re proposed funds
MES	28/03/19	\$475.00	0.60	\$285.00	Exchange emails with H. Rizarri and G. Hamilton re: payout analysis; Telephone call with H. Rizarri and G. Hamilton re: update following meeting with A. Checroune

LAWYER	DATE	RATE/ HOUR	TIME	VALUE	DESCRIPTION
MES	29/03/19	\$475.00	0.50	\$237.50	Exchange emails with H. Rizarri, G. Hamilton, E. Turkienicz re: meeting

TOTAL: 7.70 \$3,422.50

Name	Hours	Rate	Value
Miranda E. Spence (MES)	5.60	\$475.00	\$2,660.00
Steven L. Graff (SLG)	0.10	\$825.00	\$82.50
Shakaira John (SJ)	2.00	\$340.00	\$680.00

OUR FEE \$3,422.50
HST at 13% \$444.93

DISBURSEMENTS

COST INCURRED ON YOUR BEHALF AS AN AGENT

Wire Charges	\$30.00
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AMOUNT NOW DUE **\$3,897.43**

THIS IS OUR ACCOUNT HEREIN
Aird & Berlis LLP

Steven L. Graff
E.&O.E.

PAYMENT OF THIS ACCOUNT IS DUE ON RECEIPT

IN ACCORDANCE WITH THE SOLICITORS ACT, ONTARIO, INTEREST WILL BE CHARGED AT THE RATE OF 1.5% PER ANNUM ON UNPAID AMOUNTS CALCULATED FROM A DATE THAT IS ONE MONTH AFTER THIS ACCOUNT IS DELIVERED.

GST / HST Registration # 12184 6539 RT0001

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35856306.1

IN ACCOUNT WITH:

AIRD BERLIS

Brookfield Place, 181 Bay Street, Suite 1800
Toronto, Ontario, Canada M5J 2T9
T 416.863.1500 F 416.863.1515
airdberlis.com

Crowe Soberman Inc.
1100-2 St. Clair Avenue East
Toronto, ON
M4T 2T5

Attention: Hans M. Rizarri

Account No.: 633858

PLEASE WRITE ACCOUNT NUMBERS
ON THE BACK OF ALL CHEQUES

File No.: 48389/141309

May 21, 2019

Re: Proposal of 1482241 Ontario Limited and 240 Duncan Mill Road

FOR PROFESSIONAL SERVICES RENDERED on your behalf throughout the period ended May 15, 2019

LAWYER	DATE	RATE/ HOUR	TIME	VALUE	DESCRIPTION
MES	01/04/19	\$475.00	0.20	\$95.00	Telephone call with G. Hamilton
MES	03/04/19	\$475.00	0.60	\$285.00	Telephone call with G. Hamilton; Exchange emails with H. Rizarri, G. Hamilton, E. Turkienicz re: debtor response to claims and request for funds
MES	04/04/19	\$475.00	0.50	\$237.50	Exchange emails and telephone call with G. Hamilton re: agenda for meeting with 148 counsel
MES	05/04/19	\$475.00	2.20	\$1,045.00	Telephone call with G. Hamilton in advance of meeting; Attend meeting at Crowe Soberman offices with new counsel for debtor
MES	08/04/19	\$475.00	0.10	\$47.50	Receive email from G. Hamilton re: payment of monthly amount
MES	09/04/19	\$475.00	0.70	\$332.50	Exchange emails with E. Fan and G. Benchetrit re: agreements to pay costs; Telephone call with G. Hamilton re: April funding request and arrange for transfer of same; Receive and review further emails re: April funding request

LAWYER	DATE	RATE/HOUR	TIME	VALUE	DESCRIPTION
MES	10/04/19	\$475.00	0.30	\$142.50	Arrange for wire transfer to 148 re: retainer amount and email to G. Hamilton re: same
MES	11/04/19	\$475.00	0.20	\$95.00	Exchange emails with E. Turkienicz re: call to discuss issues raised by 148
MES	12/04/19	\$475.00	1.00	\$475.00	Telephone call with E. Turkienicz re: debtor's requests; Telephone calls with G. Hamilton re: outcome of same; Email to E. Turkienicz re: settlement with mortgagees re: costs
MES	16/04/19	\$475.00	0.40	\$190.00	Exchange emails with E. Turkienicz, H. Rizarri re: 148 request for distribution
MES	17/04/19	\$475.00	2.20	\$1,045.00	Telephone calls with H. Rizarri (2), G. Hamilton (3), E. Turkienicz (2), N. Paris (1), C. Stanek (1) re: distribution of funds and various issues; Exchange emails with E. Turkienicz, H. Rizarri, G. Hamilton re: distribution of funds to debtor and Allevio claim
MES	18/04/19	\$475.00	0.30	\$142.50	Correspondence with court re: scheduling 9:30 appointment and advise H. Rizarri, G. Hamilton, E. Turkienicz re: same
MES	19/04/19	\$475.00	0.20	\$95.00	Email to E. Fan re: status of payment to second mortgagee and receive emails from E. Fan and G. Hamilton re: same
MES	22/04/19	\$475.00	0.60	\$285.00	Exchange emails with E. Turkienicz re: approval of payments to mortgagees; Telephone call with H. Rizarri and G. Hamilton re: court attendance; Exchange further emails with E. Turkienicz re: same
MES	23/04/19	\$475.00	0.80	\$380.00	Exchange emails with E. Turkienicz, D. Ullman, G. Hamilton, court re: case conference; Exchange emails with G. Benchetrit re: status of payment to mortgagees; Telephone call with G. Hamilton

LAWYER	DATE	RATE/HOUR	TIME	VALUE	DESCRIPTION
MES	25/04/19	\$475.00	0.30	\$142.50	Correspondence with court re: scheduling case conference and email to parties re: same
MES	26/04/19	\$475.00	0.20	\$95.00	Telephone call with G. Hamilton re: proposed motion to address payments to 148
MES	29/04/19	\$475.00	0.20	\$95.00	Receive email from H. Rizarri re: Gowlings claim; Receive emails from court re: case conference
MES	03/05/19	\$475.00	0.30	\$142.50	Telephone call with G. Hamilton re: proposed motion and next steps; Email to E. Turkienicz requesting position
MES	06/05/19	\$475.00	0.30	\$142.50	Exchange emails with H. Rizarri re: status of settlement with 148; Voicemail from H. Rizarri
MES	07/05/19	\$475.00	0.50	\$237.50	Receive email from E. Turkienicz; Telephone call with H. Rizarri; Telephone call with G. Hamilton; Draft proposed response to E. Turkienicz
MES	08/05/19	\$475.00	0.60	\$285.00	Telephone call with G. Hamilton re: response to E. Turkienicz and interim payment; Email to E. Turkienicz; Exchange emails with E. Fan and G. Benchetrit re: status
MES	09/05/19	\$475.00	2.50	\$1,187.50	Discussion with G. Hamilton re: new claims files by the property claimants and email to E. Turkienicz re: same; Revise 8th report of the proposal trustee for case conference; Telephone calls with H. Rizarri and G. Hamilton re: same; Revise and finalize 8th report
MES	10/05/19	\$475.00	0.60	\$285.00	Telephone calls and exchanges of emails with G. Hamilton re: eighth report; Receive voicemail from H. Rizarri
MES	13/05/19	\$475.00	1.10	\$522.50	Finalize 8th report for case conference and arrange for service of same; Exchange emails with L. Keown re: status; Exchange emails

LAWYER	DATE	RATE/ HOUR	TIME	VALUE	DESCRIPTION
					with G. Benchetrit re: status; Telephone call with H. Rizarri re: next steps
MES	14/05/19	\$475.00	0.40	\$190.00	Exchange emails with G. Benchetrit re: discussions with Debtor's counsel; Exchange emails with E. Turkienicz re: Debtor's position and request to change date of case conference
MES	15/05/19	\$475.00	0.60	\$285.00	Exchange emails with H. Rizarri, and telephone call with H. Rizarri re: response to E. Turkienicz

TOTAL: 17.90 \$8,502.50

OUR FEE	\$8,502.50
HST at 13%	\$1,105.33

DISBURSEMENTS

Subject to HST

Photocopies - Local	\$20.75
HST at 13%	\$2.70

AMOUNT NOW DUE	<u>\$9,631.28</u>
-----------------------	--------------------------

THIS IS OUR ACCOUNT HEREIN
Aird & Berlis LLP

Steven L. Graff
E.O.E.

PAYMENT OF THIS ACCOUNT IS DUE ON RECEIPT

IN ACCORDANCE WITH THE SOLICITORS ACT, ONTARIO, INTEREST WILL BE CHARGED AT THE RATE OF 1.5% PER ANNUM ON UNPAID AMOUNTS CALCULATED FROM A DATE THAT IS ONE MONTH AFTER THIS ACCOUNT IS DELIVERED.

GST / HST Registration # 12184 6539 RT0001

NOTE: This account may be paid by wire transfer in Canadian funds to our account at The Toronto-Dominion Bank, TD Centre, 55 King Street West, Toronto, Ontario, M5K 1A2. Account number 5221521, Transit number 10202, Swift Code TDOMCATTOR. Please include the account number as reference.

36111474.1

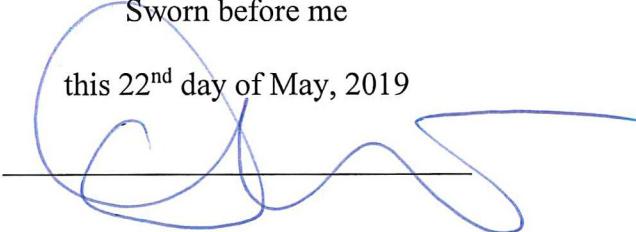
Attached is Exhibit "B"

Referred to in the

AFFIDAVIT OF STEVEN L. GRAFF

Sworn before me

this 22nd day of May, 2019


Commissioner for taking Affidavits, etc

STATEMENT OF RESPONSIBLE INDIVIDUALS

Aird & Berlis LLP's professional fees herein are made with respect to the following individuals

Lawyer	Call to Bar	Hrly Rate	Total Time	Value
Graff, S. L	1991	\$795.00 – 2018 \$825.00 - 2019	0.2 1.1	\$159.00 \$907.50
Spence, M. E	2011	\$435.00 – 2018 \$475.00 – 2019	14.0 44.7	\$6,090.00 \$12,169.50
Simkic, V.	2013	\$395.00 – 2018 \$425.00 - 2019	10.5 4.6	\$4,147.50 \$1,955.00
John, S.	2017	\$305.00 – 2018 \$340.00 - 2019	9.6 2.5	\$2,928.00 \$907.50
Clerk/Student	Call to Bar	Avg Hrly Rate	Total Time	Value
Williams, P.	N/A	\$180.00	0.6	\$108.00

**Standard hourly rates listed. However, in certain circumstances adjustments to the account were made.*

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

Proceedings commenced at Toronto

AFFIDAVIT OF FEES

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

Steven L. Graff (LSUC # 31871V)
Tel: (416) 865-7726
Fax: (416) 863-1515
Email: sgraff@airdberlis.com

Miranda Spence (LSUC # 60621M)
Tel: (416) 865-3414
Fax: (416) 863-1515
Email: mspence@airdberlis.com

*Lawyers for Crowe Soberman Inc. in its capacity as the proposal
trustee of 1482241 Ontario Limited*

Tab D

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

**IN THE MATTER OF THE PROPOSAL OF
1482241 ONTARIO LIMITED
OF THE CITY OF TORONTO
IN THE PROVINCE OF ONTARIO**

**AFFIDAVIT OF HANS RIZARRI
SWORN MAY 23, 2019**

I, Hans Rizarri, of the City of Toronto, in the Province of Ontario, **AFFIRM** and **STATE THE FOLLOWING TO BE TRUE:**

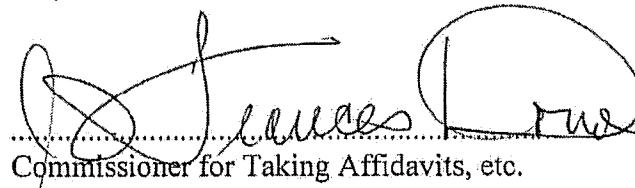
1. I am a Licensed Insolvency Trustee with the firm of Crowe Soberman Inc. (“**Crowe**”), the Proposal Trustee of 1482241 Ontario Limited (the “**Company**”), and as such have personal knowledge of the matters deposed to herein.
2. On October 13, 2017 the Company filed a Notice of Intention to make a Proposal pursuant to Section 50.4 (1) of the *Bankruptcy and Insolvency Act*, Crowe was appointed as the Proposal Trustee by the Official Receiver.

3. This affidavit is made in support of a motion to be made by the Proposal Trustee that seeks, *inter alia*, approval of the fees and disbursements of Crowe in its capacity as Proposal Trustee in respect of services provided in connection with these proceedings.

4. Crowe's detailed statement(s) of account which form the period November 20, 2018 through May 14, 2019, disclose in detail (i) the names, hourly rates and time expended by each person who rendered services, and (ii) description of services rendered for the relevant time period. A chart that summarizes the Trustee's fees and detailed time sheets are attached as Exhibit "1" to this Affidavit.

5. I have been actively involved in this matter. I have reviewed the Crowe detailed statement of account and I consider the time expended and the fees charged to be reasonable in light of the services performed and the prevailing market rates for such services.

Affirmed before me at the City of Toronto
in the Province of Ontario, on this 23 day of
May, 2019


..... Frances Doria

Commissioner for Taking Affidavits, etc.

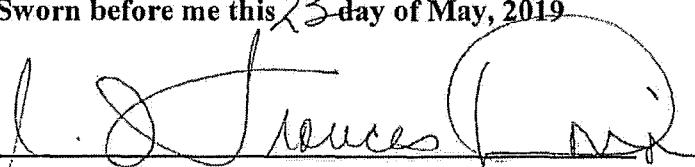
Alfonsina Frances Doria, a Commissioner, etc.,
Province of Ontario, for Crowe Soberman Inc.,
and its affiliates.
Expires May 4, 2021.


.....
HANS RIZZARI, LIT, CIRP

This is Exhibit "1" referred to

in the Affidavit of Hans Rizarri

Sworn before me this 23 day of May, 2019

A handwritten signature in black ink, appearing to read "Alfonsina Frances Doria". The signature is fluid and cursive, with "Alfonsina" on the top line and "Frances Doria" on the bottom line.

A Commissioner for Taking Oaths, in and for

The Province of Ontario

Alfonsina Frances Doria, a Commissioner, etc.,
Province of Ontario, for Crowe Soberman Inc.,
and its affiliates.
Expires May 4, 2021.

In the Matter of the Proposal of 1482241 Ontario Limited

Time Sheet Summary

From November 20, 2018 to May 14, 2019

Date	Description	Empl	Hours	Rate	Amount
11-20-2018	Update of draft report on claims proven, review of WIP, update to 7th report	GRH	1.25	350.00	\$ 437.50
11-20-2018	Banking updates to October 2018	FX	0.20	225.00	\$ 45.00
11-20-2018	Process income wire transfer	FX	0.15	225.00	\$ 33.75
11-21-2018	Accounting to date, f/u details with Aird & Berlis, GH	HMR	0.50	600.00	\$ 300.00
11-21-2018	Review of email from property claimants and schedule on same, emails from creditors, emails to counsel re allevio and insurance claim, call w counsel on all outstanding issues, reporting, fees, disallowances, trustee report re claims, review of deposits	GRH	1.35	350.00	\$ 472.50
11-21-2018	Process monthly disbursement payments	FX	0.25	225.00	\$ 56.25
11-22-2018	Call with counsel on lease amounts and next steps	GRH	0.25	350.00	\$ 87.50
11-22-2018	Disb review, interest, stint of receipts and disb draft	HMR	0.40	600.00	\$ 240.00
11-26-2018	Creditor inquiry on status and payment, response	GRH	0.15	350.00	\$ 52.50
11-27-2018	Payments to vendors, calls and emails w counsel, review and send 7th report	GRH	0.45	350.00	\$ 157.50
11-27-2018	Brief for litigation	GRH	1.50	350.00	\$ 525.00
11-28-2018	Litigation brief, scenarios, calcs on same	GRH	3.00	350.00	\$ 1,050.00
11-28-2018	Hussaini claim: trustee position and brief for court, with GH	HMR	0.40	600.00	\$ 240.00
11-29-2018	Various calls and emails w counsel on court attendance, report, fire court attendance, conf call w counsel for property claimants, next steps on same	GRH	1.25	350.00	\$ 437.50
11-29-2018	draft brief of trustee, planning thereof	HMR	0.30	600.00	\$ 180.00
11-30-2018	emails re fire violation hearing	GRH	0.25	350.00	\$ 87.50
12-3-2018	review of december expense request	GRH	0.75	350.00	\$ 262.50
12-3-2018	Neelofar, Housani v. 148 trial : trustee's position w GH	HMR	0.60	600.00	\$ 360.00
12-4-2018	prep for and travel to court for attendance, attend at Court and excuse of same for trial on property claimants, december review of expense request, and email to counsel on same	GRH	2.00	350.00	\$ 700.00
12-5-2018	calls to counsel, emails re court attendance, next steps on file for 2018	GRH	0.50	350.00	\$ 175.00
12-6-2018	call w counsel on prep for hearing, emails to company on approval of expenses and next steps	GRH	0.70	350.00	\$ 245.00

Date	Description	Empl	Hours	Rate	Amount
12-6-2018	Follow up, correpond w M.Spence re o/s matters	HMR	0.30	600.00	\$ 180.00
12-6-2018	Monthly operating expenses, review, response; email from debtor re queries on continuing request for payment not approved, position of proposal trustee thereof	HMR	0.60	600.00	\$ 360.00
12-7-2018	Office expense request by debtor review of continuing issues	HMR	0.20	600.00	\$ 120.00
12-10-2018	Operating expenses continuing issues and review; fire marhsall fine post court hearing corresp from legal counsel, trustee position thereof	HMR	1.20	600.00	\$ 720.00
12-10-2018	call w counsel on timing of 7th report and next steps, emails w counsel on hearing re fire violation, email to debtor on timing of status, email from counsel for creditor on claim re insurance	GRH	0.75	350.00	\$ 262.50
12-11-2018	Court attendance early January, legal counsel, prep material, affidavit	HMR	0.60	600.00	\$ 360.00
12-11-2018	Fire marshall fines, with legal counsel, GH	HMR	0.20	600.00	\$ 120.00
12-11-2018	fee affidavit and WIP, emails to counsel on settlement and claim, review of seventh report and emails from counsel	GRH	2.50	350.00	\$ 875.00
12-12-2018	finalize 7th report, affidavit, execute and send to counsel, review of fees, emails to counsel	GRH	2.00	350.00	\$ 700.00
12-12-2018	Closing report with M.Spence, review of outstanding issues; short dis with D.Ullmann; banking review	HMR	0.60	600.00	\$ 360.00
12-12-2018	Affidavit and application for court attendance served on all parties	HMR	0.30	600.00	\$ 180.00
12-13-2018	emails w creditor, counsel, next steps on reporting	GRH	0.20	350.00	\$ 70.00
12-17-2018	emails and calls re fee objection by debtor	GRH	0.40	350.00	\$ 140.00
12-17-2018	Opposition by debtor to Dec 19 motion, review with staff, dis with M.Spence	HMR	0.40	600.00	\$ 240.00
12-18-2018	M.Spence corresp; objections by principal of debtor to motion, call with M.Spence, position of proposal trustee its role imposed by court order re holding of funds, monitoring monthly expenses, disallowance procedure of signifiant contingent creditors etc	HMR	0.80	600.00	\$ 480.00
12-18-2018	various emails w counsel on debtors position re motion, call on same and follow up on same, post emails on position of debtor opposition, request for adjournment	GRH	0.75	350.00	\$ 262.50
12-19-2018	court attendance, pre prep, emails on same, emails w counsel for property claimants, emails from debtor making requests of Proposal Trustee	GRH	1.25	350.00	\$ 437.50

Date	Description	Empl	Hours	Rate	Amount
12-21-2018	prep Nov 2018 Bank Rec	FX	0.20	225.00	\$ 45.00
1-2-2019	creditor inquiries and response on same	GRH	0.15	350.00	\$ 52.50
1-3-2019	creditor inquiries, emails from creditors	GRH	0.20	350.00	\$ 70.00
1-7-2019	call with counsel, various emails on meeting, emails on Jan expenses, creditor inquiries	GRH	0.70	350.00	\$ 245.00
1-8-2019	Tele dis with David Ullmann re court attendance next week; review with staff	HMR	0.30	600.00	\$ 180.00
1-8-2019	various matters re next steps on fee approval, meet w hR, meet w SA and advise on summary of time sheets for meeting, emails from counsel on same	GRH	0.40	350.00	\$ 140.00
1-9-2019	emails from debtor counsel, call w estate counsel on same and request	GRH	0.30	350.00	\$ 105.00
1-10-2019	emails from 148, call w counsel, assist SP re time sheet, prep time sheet, response re January request for funds	GRH	1.10	350.00	\$ 385.00
1-11-2019	finalize spreadsheet for HR, compose and send email re Jan disbursements	GRH	0.50	350.00	\$ 175.00
1-14-2019	Jan 11.18: Operating expense review	HMR	0.20	600.00	\$ 120.00
1-14-2019	emails on disbursements, emails on meeting and review of accounts	GRH	0.40	350.00	\$ 140.00
1-15-2019	various emails to creditor, discuss court attendance, brief on meeting w HR, calls w counsel, prep package for HR w debtor on claims	GRH	1.00	350.00	\$ 350.00
1-15-2019	Prepare for and attend meeting with Alain Checroune and Andy Degan	HMR	1.00	600.00	\$ 600.00
1-16-2019	prep for and attend at Court for hearing regarding professional fees. Prep and finalize report on claims for trustee for meeting w director, review and advise HR and debtor on funds available	GRH	3.50	350.00	\$ 1,225.00
1-18-2019	Attend meeting with principal	HMR	1.50	600.00	\$ 900.00
1-18-2019	process wire transfer payment	FX	0.15	225.00	\$ 33.75
1-21-2019	Review with D.Ullmann	HMR	0.20	600.00	\$ 120.00
1-21-2019	prep Dec 2018 Bank Rec	FX	0.20	225.00	\$ 45.00
1-22-2019	emails w debtor, calls and emails w counsel, receipt of closing book, send to debtor, emails re fire code and settlement	GRH	0.45	350.00	\$ 157.50
1-23-2019	various emails w counsel, calls w HR	GRH	0.20	350.00	\$ 70.00

Date	Description	Empl	Hours	Rate	Amount
1-23-2019	Prep for and meeting with Alain Checroune and Andy Degan; post meeting dis and review with GH, legal counsel	HMR	3.50	600.00	\$ 2,100.00
1-24-2019	Conf call with M.Spence, S.Graff, GH re statement of adj review thereof, planning	HMR	0.60	600.00	\$ 360.00
1-24-2019	conference call w counsel on next steps re lease payment discrepancy, review decision re fire violation	GRH	1.00	350.00	\$ 350.00
1-25-2019	fire code fine, settlement status	GRH	0.20	350.00	\$ 70.00
1-25-2019	Property Claim of Housiani, Neelofar: decision of Justice Chiapetta, initial review of claims, disallowances re contingency and others, draft of distribution, dis with David Ullmann	HMR	2.30	600.00	\$ 1,380.00
1-28-2019	various emails on status of fire code violation settlement and next steps on same, call with counsel, review of	GRH	0.45	350.00	\$ 157.50
1-28-2019	Distribution schedules of funds post Housaini Neelofar decision	HMR	0.80	600.00	\$ 480.00
1-30-2019	emails from debtor, request for accounting, request for Feb disbursements, call with counsel, next steps, request for balance of funds, review of same	GRH	0.65	350.00	\$ 227.50
1-31-2019	review of correspondence on security deposits to tenants, Feb expense review and email initial review to counsel	GRH	0.70	350.00	\$ 245.00
2-1-2019	creditor inquiries on status of dividend, review of notice of appeal	GRH	0.45	350.00	\$ 157.50
2-1-2019	Neelofar/Hussaini appeal record receipt and review; request by debtor for distribution of funds, position of proposal trustee thereof; balance of claims, contingent claims to process	HMR	1.20	600.00	\$ 720.00
2-4-2019	call with counsel, creditor inquiries, response from tenant on request on rent/deposit, send debtor Feb 2019 payout request,	GRH	1.00	350.00	\$ 350.00
2-4-2019	Monthly expense request review	HMR	3.00	600.00	\$ 1,800.00
2-5-2019	confirmation of wire to debtor for Feb	GRH	0.20	350.00	\$ 70.00
2-12-2019	various emails and calls with counsel on debtors motion, status of responses from tenants, position of PT	GRH	0.60	350.00	\$ 210.00
2-13-2019	Endorsement of Hainey, J; Neelofar et al change of counsel	HMR	0.20	600.00	\$ 120.00
2-14-2019	call with counsel on outcome of court hearing, review of endorsement, discuss next steps, planning, emails on same, creditor inquiries, balance of estate inquiries	GRH	0.55	350.00	\$ 192.50
2-15-2019	prep Jan 2019 Bank Rec	FX	0.20	225.00	\$ 45.00
2-15-2019	Review of closing sale items, attend meeting with principal re o/s items, request of time sheet, invoices of trustee and legal counsel	HMR	1.00	600.00	\$ 600.00

Date	Description	Empl	Hours	Rate	Amount
2-19-2019	call with counsel on next steps re stay application, holdback amounts, tenant responses, strategy on same	GRH	0.40	350.00	\$ 140.00
2-21-2019	various emails w counsel, follow up call, claims, next steps, court attendance	GRH	0.40	350.00	\$ 140.00
2-25-2019	call w counsel re next steps for holdback, calculation on claims and potential release, next steps, court attendance, meeting with HR on requests for materials,	GRH	0.50	350.00	\$ 175.00
2-26-2019	call with counsel on next steps re distribution amounts, locate and prep materials for meeting w debtor, request from debtor for funds	GRH	0.75	350.00	\$ 262.50
2-26-2019	Prepare information requested by Alain Checroune previously emailed to D.Ullmann: sale completion book, receipts and disbursements incl details of payments to vendors, supporting invoices for suppliers, Cushman commission agreement; attend meeting Alain	HMR	1.50	600.00	\$ 900.00
2-27-2019	emails w counsel on next steps, review and advise on March disbursements made, emails to company	GRH	0.75	350.00	\$ 262.50
2-28-2019	wire transfer status, details of meeting with debtor, various requests for books and records, organize same	GRH	0.40	350.00	\$ 140.00
2-28-2019	Attend at 148 offices with Alain and Jaclyn re proof of claims, Gowlings settlement, Hydro, Clear Customs, funds in trust back to debtor, Notice of Appeal of Neelofar Housiani	HMR	1.00	600.00	\$ 600.00
3-1-2019	calls from company on requested materials	GRH	0.20	350.00	\$ 70.00
3-5-2019	materials sent as per request. emails on same. review with Sheila.	GRH	0.50	350.00	\$ 175.00
3-6-2019	call with counsel, review of leases, request for docs, next steps on file	GRH	0.40	350.00	\$ 140.00
3-7-2019	Debtor request of banking information, source documents, banking advice etc.	HMR	0.50	600.00	\$ 300.00
3-8-2019	updated statement of receipts and disbursements	GRH	0.40	350.00	\$ 140.00
3-11-2019	Accounting review of A&B trust account as requested by Alain; fire code fine f/up	HMR	0.50	600.00	\$ 300.00
3-11-2019	calls with counsel, emails on status of payment for fire code infraction, emails from counsel for debtor on accounting, analysis of A&B ledger	GRH	0.40	350.00	\$ 140.00
3-12-2019	various calls and emails w counsel, fire violation questions,	GRH	0.25	350.00	\$ 87.50
3-13-2019	Compile accounting trust ledger from A&B, prepare for and meeting with Alain Checroune review of trust ledger, review of claims register, allow and disallow claims; planning	HMR	2.00	600.00	\$ 1,200.00

Date	Description	Empl	Hours	Rate	Amount
3-13-2019	finalize accounting for debtor as per request, review of same, edit and send materials on same, post prep for meeting w HR and debtor, emails to estate counsel, request for additional items	GRH	1.35	350.00	\$ 472.50
3-14-2019	Banking, lawyer trust info request by Alain, GIC account review; payout of claims register review with GH and Alain's request of additional funds analysis	HMR	1.00	600.00	\$ 600.00
3-14-2019	accounting and meeting re next steps, potential settlement	GRH	0.25	350.00	\$ 87.50
3-15-2019	Debtor request of 3M payout, analysis per claims register incl contingent creditors allowed, to be disallowed per debtor, call with M.Spence, fwd to D.Ullmann	HMR	1.50	600.00	\$ 900.00
3-18-2019	F/up with D.Ullmann, M.Spence re request by debtor for funds	HMR	0.20	600.00	\$ 120.00
3-18-2019	various emails re settlement discussions	GRH	0.20	350.00	\$ 70.00
3-20-2019	March 19.19; follow up request, dis w D.Ullmann re interim distribution excel schedule and request by Alain for funds	HMR	0.40	600.00	\$ 240.00
3-20-2019	Legal fees and other amounts to incl in interim distribution excel schedule for Alain request for funds	HMR	0.80	600.00	\$ 480.00
3-21-2019	Continued revisions of interim dividend and distribution to debtor analysis, o/s matters incl disallowance of claims, notes on requirements to affect distributions, timing and costs on same	HMR	0.80	600.00	\$ 480.00
3-21-2019	Dis with M.Spence re distribution of funds to debtor, dividends	HMR	0.30	600.00	\$ 180.00
3-21-2019	Receipt of notice D.Ullmann change of lawyer; request of invoice from debtor previously in motion material; dis with M.Spence re outstanding matters	HMR	0.80	600.00	\$ 480.00
3-21-2019	review of interim statement of receipts and disbursements, new counsel, call w counsel, review of correspondence from debtor, review of avison young	GRH	1.00	350.00	\$ 350.00
3-22-2019	Request by Alain re accounts and distribution of funds, analysis thereof updates, planning	HMR	0.50	600.00	\$ 300.00
3-22-2019	calls and emails w counsel, next steps, emails w mortgagee, review wip, gl, payments made by avison young, settlements	GRH	0.75	350.00	\$ 262.50
3-25-2019	Alain request distribution, analysis update with additional info, dis w same legal counsel	HMR	0.40	600.00	\$ 240.00
3-25-2019	file review and assist SP for HR, various emails on potential distribution scenarios with counsel	GRH	0.55	350.00	\$ 192.50
3-26-2019	prep Feb 2019 Bank Rec	FX	0.20	225.00	\$ 45.00
3-26-2019	confirm payments to vendors	GRH	0.15	350.00	\$ 52.50

Date	Description	Empl	Hours	Rate	Amount
3-27-2019	emails w creditors, vendors, call w counsel, assist SP with package for HR	GRH	0.50	350.00	\$ 175.00
3-28-2019	Attend 148 office, requested mtg Alain review of what has been already ordered by Court incl: legal fees, trustee fees, funds Aird Berlis trust, Avison Young pymnts, also fire code fine, sale of building, deposits adj on sale, request of distribution \$5M	HMR	2.00	600.00	\$ 1,200.00
3-28-2019	prep for meeting, distribution scenarios, emails w HR, DU, counsel, debtor, email review,	GRH	1.35	350.00	\$ 472.50
3-29-2019	email review, as per HR, send various materials to company re accounting of property management, closing documents, disallowance of claims, meeting with opposing counsel and call w MS	GRH	1.50	350.00	\$ 525.00
3-29-2019	Alain request of info prvsly provided: review corresp in 2018 re stmt of adjustments and Avison Young reporting already sent to Alain, Laxmi; corresp to Jacelyn, Alain re 2018 emails ,link to trustee website info posted; M.Spence re Eric Turkienwicz corresp	HMR	0.60	600.00	\$ 360.00
4-1-2019	call with counsel, emails with company, meeting w HR, creditor inquiries	GRH	0.55	350.00	\$ 192.50
4-3-2019	emails re payment of April expenses, notice re claims not approved, next steps on same, calls with counsel, emails to counsel on reccomended payment amounts, review report	GRH	1.10	350.00	\$ 385.00
4-4-2019	meeting and prep of agenda, calls with counsel on same, begin compilation	GRH	1.00	350.00	\$ 350.00
4-5-2019	Prepare for meeting with debtor new lawyer Eric Turkienwicz of McCague Borlack, updates and review of SRD reconciling sale of building to balance in trust account of Aird Berlis, updates on proposed payout to 148 incl proof of claims, agenda for meeting thereof	HMR	1.30	600.00	\$ 780.00
4-5-2019	Meeting with Eric Turkienwicz of McCague Borlack, new lawyer for debtor, with M.Spence, GH: review of SRD sale proceeds disb rec to balance in Aird Berlis, proposed distr, proof of claim, disallow dispute process by Hainey, J, approval process, mortgages	HMR	2.00	600.00	\$ 1,200.00
4-5-2019	prep materials for an attend meeting with new counsel for debtor	GRH	4.00	350.00	\$ 1,400.00
4-9-2019	call with counsel, send April approval amount, emails from Lerners and Chaitons on evidence of settlement, request for more funds for legal counsel, follow up call w MS, review of retainer and next steps	GRH	1.00	350.00	\$ 350.00

Date	Description	Empl	Hours	Rate	Amount
4-12-2019	call with counsel, disuss next steps, post conf call with counsel for debtor, potential 930 attendance	GRH	0.40	350.00	\$ 140.00
4-12-2019	Debtor from lawyer E.Turkienwicz dis M.Spence, review of proposal trustee's position, need for distr to creditors with proven claims, planning	HMR	0.80	600.00	\$ 480.00
4-16-2019	emails from counsel, settlement, objection to legal bills	GRH	0.25	350.00	\$ 87.50
4-16-2019	Eric Turkienicz request of additional funds payout to debtor, review analysis, response to M.Spence on same; debtor opposing Blaneys fees, consider court direction on disbursements and payout requested by debtor, planning	HMR	0.40	600.00	\$ 240.00
4-17-2019	calls and emails w counsel on settlement and issues on same, send Allevio analysis, numerous emails on settlement, next steps, reemergence of property claimant issue	GRH	0.85	350.00	\$ 297.50
4-22-2019	various emails and calls with counsel on settlement and next steps	GRH	0.40	350.00	\$ 140.00
4-22-2019	Debtor opposition and request for funds: review with M.Spence re May 15 930, lack of progress to resolve and need to distribute to proven creditors, mortgagees, motion by proposal trustee for distribution/directions on all matters; case conference booking	HMR	0.80	600.00	\$ 480.00
4-23-2019	various calls and emails with counsel on next steps and court dates	GRH	0.25	350.00	\$ 87.50
4-24-2019	Call from Neil Paris lawyer for Neelofar and Housaini, dis of proposal trustee role, their claim of 20% interest, proposal process to date, request to file p of claim; email from Neil Paris	HMR	0.60	600.00	\$ 360.00
4-25-2019	Case conference set, planning thereof	HMR	0.20	600.00	\$ 120.00
4-26-2019	update website, call w counsel on next steps	GRH	0.30	350.00	\$ 105.00
4-30-2019	prep March 2019 Bank Rec	FX	0.20	225.00	\$ 45.00
5-3-2019	calls and emails w counsel on next steps	GRH	0.15	350.00	\$ 52.50
5-3-2019	call with Jacqueline Re claim of Alain Checrone and email to Hans for a meeting they want to convene	LDS	0.20	390.00	\$ 78.00
5-6-2019	Attend at debtor review of Gowlings claim, settlement pre proposal filing, other accounts incl ACRC and Bitton/500 Sheppard matter; dis rent deposit and agreement to adjust purchase price with buyer of 240 Duncan Mills; debtor requesting additional disbursements	HMR	1.20	600.00	\$ 720.00
5-7-2019	Debtor re YYZ Plumbing claim, response from M.Spence on same to lawyer for debtor Eric T.; dis with M.Spence re distribution as prvs analyzed, corresp thereof	HMR	0.60	600.00	\$ 360.00

Date	Description	Empl	Hours	Rate	Amount
5-7-2019	creditor inquiry on status of administration, review of May request for expenses, call with counsel, draft 8th report, position on YYZ plumbing.	GRH	1.75	350.00	\$ 612.50
5-8-2019	analysis re may request and emails on same, finalize report, email to creditor, call with counsel, review of materials, emails to debtor counsel, additional claim and review of affidavit, emails to counsel for mortgagee	GRH	3.25	350.00	\$ 1,137.50
5-9-2019	send email to counsel re proof of claim, follow up on same, calls on same, status of report on same, initial review of counsel comments on report, conference call with counsel	GRH	1.45	350.00	\$ 507.50
5-10-2019	8th report, prep and finalize	GRH	2.00	350.00	\$ 700.00
5-10-2019	Draft report to court re May 24 case conference, review with GH; dis with M.Spence on same, planning; proof of claim and affidavit of Neelofar and Housaini	HMR	1.30	600.00	\$ 780.00
5-14-2019	Debtor positions, objections, settlements to be done with creditors on various matters re distribution, prep for case conference with Justice Hainey; debtor request of distr earlier; review, trustee position thereof	HMR	1.30	600.00	\$ 780.00
Total			118.05		\$ 53,231.75

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

Proceedings commenced at Toronto

**SUPPLEMENTARY MOTION RECORD
(returnable May 24, 2019)**

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Barristers and Solicitors
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*Lawyers for Crowe Soberman Inc. in its capacity as the proposal
trustee of 1482241 Ontario Limited*