

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**IN THE MATTER OF THE NOTICE OF INTENTION TO
MAKE A PROPOSAL OF CANAMIDEX INTERNATIONAL
CORPORATION, A CORPORATION INCORPORATED
UNDER THE *BUSINESS CORPORATIONS ACT* (ONTARIO)**

**MOTION RECORD
(Extension of time to file a proposal returnable June 29, 2022)**

June 24, 2022

GOLDMAN SLOAN NASH & HABER LLP

480 University Avenue, Suite 1600

Toronto, Ontario M5G 1V2

Fax: 416-597-6477

R. Brendan Bissell – LSO #: 40354V

Tel: (416) 597-6489

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Joël Turgeon – LSO # 80984R

Tel: (416) 597-6486

Email: turgeon@gsnh.com

Lawyers for Canamidex International Corporation

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**IN THE MATTER OF THE NOTICE OF INTENTION TO
MAKE A PROPOSAL OF CANAMIDEX INTERNATIONAL
CORPORATION, A CORPORATION INCORPORATED
UNDER THE *BUSINESS CORPORATIONS ACT* (ONTARIO)**

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TAB 1

Notice of motion returnable June 22, 2022

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**IN THE MATTER OF THE NOTICE OF INTENTION TO
MAKE A PROPOSAL OF CANAMIDEX INTERNATIONAL
CORPORATION, A CORPORATION INCORPORATED
UNDER THE *BUSINESS CORPORATIONS ACT* (ONTARIO)**

**NOTICE OF MOTION
(Extension of time to file a proposal returnable June 29, 2022)**

Canamidex International Corporation (the “**Company**”) will make a motion to Mr. Justice Osborne of the Commercial List at 330 University Avenue, Toronto, Ontario, on Wednesday, June 29, 2022 at 12:30 pm or as soon thereafter as the motion can be heard, via Zoom teleconference, the details for which will be made available by the courthouse on the Caselines website for this court file. If you do not have access to the Caselines website for this court file, please advise the courthouse or the undersigned forthwith.

THE PROPOSED METHOD OF HEARING: The motion is to be heard orally.

THE MOTION IS FOR an order, in suggested accordance with the draft order provided, extending the time to file a proposal to August 17, 2022.

THE GROUNDS FOR THE MOTION ARE:

1. The Company filed a Notice of Intention to Make a proposal (“**NOI**”) on June 3, 2022.
2. The Company’s solvency came into question when a large contract it had to supply NATO with various parts and equipment fell into jeopardy and has since been cancelled as a result

of fraud by a subcontractor engaged by the Company to provide the parts and equipment along with the appropriate documentation.

3. The principal of the subcontractor in question has agreed to a plea deal with the authorities in the State of California in respect of these transactions.
4. The Company has expended millions of dollars of funds in attempting to perform the NATO contract at issue and will now be unable to recover those funds due to the cancellation of the contract.
5. The Company is attempting to review its restructuring options, including a possible proposal to creditors and/or a sale of some or all of the Company's assets in order to achieve the best result for creditors and to fund a possible proposal.
6. The Company's operations have been substantially curtailed since filing its NOI but its ongoing cash flow needs are being met through the resources of its principal, so the creditors of the Company are not being prejudiced by the passage of time.
7. The Company is attempting in good faith to work with the affected stakeholders, including prominently Bank of Montreal as the ranking secured creditor, to discuss options and attempt to negotiate terms for possible restructuring options.
8. The Proposal Trustee recommends the relief sought.

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

- a. The affidavit of Mehdi Darbari sworn June ■, 2022 and its exhibits.
- b. The report of the Proposal Trustee to be served and filed separately.

- c. Such further and other evidence as counsel may advise and the court may permit.

DATE: June 23, 2022

GOLDMAN SLOAN NASH & HABER LLP

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Lawyers for Canamidex International Company

TO: THE SERVICE LIST

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL
OF CANAMIDEX INTERNATIONAL CORPORATION, A CORPORATION
INCORPORATED UNDER THE *BUSINESS CORPORATIONS ACT* (ONTARIO)**

Estate No. 31-2836316

ONTARIO
SUPERIOR COURT OF JUSTICE
(Commercial List)

NOTICE OF MOTION
(Extension of time to file a proposal
returnable June 29, 2022)

GOLDMAN SLOAN NASH & HABER LLP
480 University Avenue, Suite 1600
Toronto ON M5G 1V6 Fax:
(416) 597-3370

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Tel: (416) 597-6486
Email: turgeon@gsnh.com

Lawyers for Canamidex International Corporation

TAB 2

Affidavit of Mehdi Darbari sworn June 24 , 2022

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**IN THE MATTER OF THE NOTICE OF INTENTION TO
MAKE A PROPOSAL OF CANAMIDEX INTERNATIONAL
CORPORATION, A CORPORATION INCORPORATED
UNDER THE *BUSINESS CORPORATIONS ACT* (ONTARIO)**

**AFFIDAVIT OF MEHDI DARBARI
(Sworn June 24, 2022)**

I, Mehdi Darbari, of Town of Newmarket, Ontario, **MAKE OATH AND SAY:**

1. I am the president of Canamidex International Corporation (the “**Company**”) and therefore have knowledge of the matters referred to in this affidavit. In preparing this affidavit, I consulted with legal, financial and other advisors of the Company. Where this affidavit is on information and belief, I have stated the source of that information and believe it true.
2. This affidavit is in support of a motion by the Company for an extension of the time to file a proposal to August 17, 2022.
3. The Proposal Trustee supports the relief sought, as I am advised will more fully appear from the Proposal Trustee’s third report to be served and filed separately (the “**First Report**”).

I. BACKGROUND

A. The business

4. My personal background is as an engineer. I grew up and received my education in Iran, where I worked for my father’s company in performing various civil engineering projects. Upon my arrival in Canada in 2006, I incorporated the Company as a vehicle to continue

to perform that type of work. A copy of the articles of incorporation is attached as **Exhibit “A”**.

5. Initially, the Company’s work was primarily in civilian engineering projects. For example, the Company did work under various United Nations agencies for installation of civilian medical and other facilities in locations such as Syria and South Sudan.
6. Commencing in approximately 2014-2015, the Company got the opportunity to begin supplying parts and materials to the Canadian Department of National Defence (“**DND**”).
7. Supplying to a defence institution like DND requires additional licences and clearance for, among other things, access to confidential and potentially sensitive military specifications and procurement details. The Company acquired all such items at that time and successfully worked with DND on a number of projects.
8. Thereafter, working with DND allowed the Company to also become an authorized supplier to the NATO Support and Procurement Agency (“**NSPA**”), because qualification for a member country such as Canada is also then qualification to supply to NSPA. Recently, the Company has also begun bidding on procurements run by an American defence procurement entity by the name of Defence Logistics Agency (“**DLA**”) and also supplying parts and other items to DLA under various contracts.
9. Until recently, the Company had three employees. Due to the insolvency situation (discussed below) the Company has temporarily laid off all of its employees and I am attempting to keep the Company running on a basic level while restructuring options are reviewed and discussed with stakeholders and ultimately brought to the Court.

B. Causes of insolvency, and creditors

10. The Company has historically been successful and profitable. Its cause of insolvency can be almost exclusively tied to a contract that the Company had with NSPA that has resulted in losses to the Company that it simply cannot sustain.
11. The contract in question was awarded to the Company by NSPA in 2020. For reasons of confidentiality, I am not able to disclose many details of the subject matter of that contract, so I will simply note that it was to supply various parts in relation to aerospace and military application.
12. The Company does not necessarily manufacture any parts or components itself and has in many cases historically sourced any such materials from authorized suppliers. In the case of the NSPA contract in question, the Company entered into a new relationship with a California based supplier called California Aircraft and Avionics Corporation (“CAAC”).
13. CAAC supplied several initial shipments of the products that were required under that contract, which the Company sent to NSPA and which were accepted without any difficulty. As a result, the Company continued to order further products from CAAC.
14. The difficulties with the contract arose when NSPA contacted the Company in September of 2021 to advise that the products supplied by CAAC under subcontract to the Company were incorrect and counterfeit and that the accompanying documentation had been forged or altered in order to attempt to pass those products off as the correct ones. NSPA accordingly halted all further orders and payment under the contract.
15. In response to that advice from NSPA, the Company took several steps. First, it engaged Pillsbury Winthrop Shaw Pittman LLP in Los Angeles to represent the Company and to

assist in seeking a criminal referral to the Office of the Inspector General of the Department of Transportation and to also communicate with NSPA. Second, the Company also engaged a consulting firm comprised of retired senior members of the Canadian Armed Forces who have contacts with NATO in order to advise on and assist with attempts to regularize the Company's contract with NSPA and, if successful, to assist in making new arrangements to fulfil that contract. I am unable to disclose the particulars of that consulting firm due to confidentiality obligations that the Company agreed to in the relevant engagement letter.

16. Unfortunately, despite those efforts, NSPA advised the Company in mid-June that the contract in question was going to be cancelled by NSPA and no further payments were going to be made under it.
17. Based on what NSPA and the consultants have told me, I believe that there is a reasonable chance that the Company will be allowed to bid on and supply in further NSPA procurement matters, because there has been increasing publicity surrounding the actions by CAAC and a growing acceptance that the "problem" was not with the Company even if it is ultimately responsible to NSPA under the contract for the lack of compliance in terms of the products and documentation.
18. As a result of the problems with CAAC and the NSPA contract, the Company found itself in the late Spring of 2022 in a position where it had expended approximately \$3 million of funds for both new orders to CAAC and other costs for fulfilling the delivery and logistics needs of NSPA, while an amount significantly greater than that as the expected payment from NSPA will now no longer be coming. That amount of losses far exceeds the projected

profit earning potential of the Company for many years, and will also limit or eliminate the Company's ability to borrow funds as may be necessary to fund further projects.

19. The Company therefore filed a Notice of Intention to Make a Proposal on June 3, 2022, a copy of which is part of the creditor mailing package attached as **Exhibit "B"**.
20. As of June 3, 2022, the Company's records showed amounts owing to creditors of \$3,677,101.88, of which \$3,000,000 is a secured loan obligation to Bank of Montreal and a further \$300,000+ are current or expected claims from NSPA. The claims from NSPA relate to products that were supplied prior to September of 2021 and only noticed as improper or counterfeit after payment had been made by NSPA to the Company. A full listing of the Company's known creditors is attached as part of Exhibit "B".
21. The amounts owing to Bank of Montreal are largely comprised of funds borrowed under a credit facility with the bank that was specifically increased for the purpose of this contract, and which was also guaranteed in part by Export Development Canada. Before this contract, the Company carried only a line of credit that was normally in the range of \$500,000, although there was one time when it increased temporarily to approximately \$750,000 when the Company was fulfilling a contract overseas with UNICEF.
22. The Company has prepared a cash flow projection with the assistance of the Proposal Trustee. A copy of that is attached as **Exhibit "C"**. The cash flow projection shows a deficit of cash receipts as against expenses over its period. I am arranging for funds to be made available to the Company from friends and family in order to meet those cash requirements.

C. Assets and possible restructuring options

23. The Company's conventional assets are approximately \$20,000 to \$30,000 of accounts receivable, and what I would estimate as half a room's worth of parts. I am unsure what the value of the parts is, because if they had to be sold in a rushed manner they may not be worth much at all as they are likely to be more valuable at some point in the future when a previous customer requires further parts that are now being kept in inventory by the Company.
24. In addition, the Company has several ongoing contracts with DLA, which I believe represent an opportunity to continue to make revenue. I believe those contracts in particular are significant to the Company because they represent the first times when the Company has supplied an American defence contractor directly, and may therefore lead to further contracts. I also note that for the DLA contracts, the Company is increasingly becoming involved in the manufacturing and assembling part of procurement, in part as a reaction to the situation with CAAC. I do not expect that the difficulty with the NSPA contract as noted above will necessarily be an impediment in that regard, again due to the publicity involving CAAC and the resulting exculpating effect that has on the Company.
25. Aside from those assets, the Company's only other notable asset is a claim against CAAC for the damages that the Company has suffered as a result of CAAC's actions. I am unsure of how much that claim is worth, because legal fees in California are very high and also because I am unsure of the prospects for recovery on that claim. My understanding is that CAAC was engaged in similar activity for other contracts and as a result is facing numerous claims.

26. The planned restructuring of the Company following the June 3, 2022 filing had been to attempt to work out the NSPA contract in a manner that would allow the repayment of substantial amounts of the Company's debt over time. The cancelation of the NSPA contract in mid-June has forced the Company to consider more significant restructuring options, including a possible sale of some or all of its assets in an organized manner in order to attempt to achieve the best result for creditors and stakeholders.
27. I intend to work with the Proposal Trustee and the Company's legal counsel to develop the options that are available and then to discuss them with the Company's stakeholders, including in particular Bank of Montreal and EDC as an effective guarantor of a majority of the amounts owing to the bank. I believe that further time will allow the Company to make progress towards such efforts and towards a proposal that creditors may be prepared to accept.

SWORN BEFORE ME via Zoom at the City of Toronto, in the Province of Ontario, this 24th day of June, 2022 in accordance with O. Reg. 431/20, *Administering an Oath or Declaration Remotely*



Commissioner for taking affidavits
(present at Toronto at the time of swearing)



Mehdi Darbari
(present at [redacted] at the time of swearing)
Newmarket, ON

This is **Exhibit “A”** to the affidavit of Mehdi Darbari sworn before me this **24** day of June, 2022, in accordance with O. Reg. 431/20, *Administering an Oath or Declaration Remotely*

A handwritten signature in blue ink, appearing to be 'R.B.C.', is written in a cursive style.

A Commissioner, etc.

Request ID: 008876952
Demande n°:
Transaction ID: 031448130
Transaction n°:
Category ID: CT
Catégorie:

Province of Ontario
Province de l'Ontario
Ministry of Consumer and Business Services
Ministère des Services aux consommateurs et aux entreprises
Companies and Personal Property Security Branch
Direction des compagnies et des sûretés mobilières

Date Report Produced: 2007/02/09
Document produit le:
Time Report Produced: 14:32:33
Imprimé à:

Certificate of Incorporation Certificat de constitution

ORIGINAL

This is to certify that

Ceci certifie que

CANAMIDEX INTERNATIONAL CORP.

Ontario Corporation No.

Numéro matricule de la personne morale en
Ontario

002127343

is a corporation incorporated,
under the laws of the Province of Ontario.

est une société constituée aux termes
des lois de la province de l'Ontario.

These articles of incorporation
are effective on

Les présents statuts constitutifs
entrent en vigueur le

FEBRUARY 09 FÉVRIER, 2007



Director/Directrice
Business Corporations Act/Loi sur les sociétés par actions

RECEIVED

02113 2010

MISSISSAUGA
BOARD OF TRADE
ONTARIO, CANADA

Amalyn Dupuis, a Commissioner
etc., Province of Ontario, for
Mississauga Board of Trade.
Expires December 7, 2012



Request ID / Demande n°

Ontario Corporation Number
Numéro de la compagnie en Ontario

8876952

2127343

FORM 1

FORMULE NUMÉRO 1

BUSINESS CORPORATIONS ACT

/

LOI SUR LES SOCIÉTÉS PAR ACTIONS

ARTICLES OF INCORPORATION
STATUTS CONSTITUTIFS

1. The name of the corporation is: *Dénomination sociale de la compagnie:*
CANAMIDEX INTERNATIONAL CORP.

2. The address of the registered office is: *Adresse du siège social:*

6021 YONGE STREET

Suite 336

(Street & Number, or R.R. Number & if Multi-Office Building give Room No.)
(Rue et numéro, ou numéro de la R.R. et, s'il s'agit édifice à bureau, numéro du bureau)

TORONTO
CANADA

ONTARIO
M2M 3W2

(Name of Municipality or Post Office)
(Nom de la municipalité ou du bureau de poste)

(Postal Code/Code postal)

3. Number (or minimum and maximum number) of directors is: *Nombre (ou nombres minimal et maximal) d'administrateurs:*
Minimum 1 Maximum 10

4. The first director(s) is/are: *Premier(s) administrateur(s):*

First name, initials and surname
Prénom, initiales et nom de famille

Resident Canadian State Yes or No
Résident Canadien Oui/Non

Address for service, giving Street & No. or R.R. No., Municipality and Postal Code

Domicile élu, y compris la rue et le numéro, le numéro de la R.R., ou le nom de la municipalité et le code postal

* MEHDI YES
MOEIN DARBARI

6021 YONGE STREET Suite 336

TORONTO ONTARIO
CANADA M2M 3W2



Request ID / Demande n°

Ontario Corporation Number
Numéro de la compagnie en Ontario

8876952

2127343

4. The first director(s) is/are:

Premier(s) administrateur(s):

First name, initials and surname
Prénom, initiales et nom de famille

Resident Canadian State Yes or No
Résident Canadien Oui/Non

Address for service, giving Street & No.
or R.R. No., Municipality and Postal Code

Domicile élu, y compris la rue et le
numéro, le numéro de la R.R., ou le nom
de la municipalité et le code postal

* MEHRAN
FATEMI

YES

6021 YONGE STREET Suite 336

TORONTO ONTARIO
CANADA M2M 3W2



Request ID / Demande n°

Ontario Corporation Number
Numéro de la compagnie en Ontario

8876952

2127343

-
5. Restrictions, if any, on business the corporation may carry on or on powers the corporation may exercise.
Limites, s'il y a lieu, imposées aux activités commerciales ou aux pouvoirs de la compagnie.

None

6. The classes and any maximum number of shares that the corporation is authorized to issue:
Catégories et nombre maximal, s'il y a lieu, d'actions que la compagnie est autorisée à émettre:

100 COMMON SHARES.



Request ID / Demande n°

Ontario Corporation Number
Numéro de la compagnie en Ontario

8876952

2127343

-
7. Rights, privileges, restrictions and conditions (if any) attaching to each class of shares and directors authority with respect to any class of shares which may be issued in series:
Droits, privilèges, restrictions et conditions, s'il y a lieu, rattachés à chaque catégorie d'actions et pouvoirs des administrateurs relatifs à chaque catégorie d'actions que peut être émise en série:

None



Request ID / Demande n°

Ontario Corporation Number
Numéro de la compagnie en Ontario

8876952

2127343

-
10. The names and addresses of the incorporators are
Nom et adresse des fondateurs

First name, initials and last name
or corporate name

*Prénom, initiale et nom de
famille ou dénomination sociale*

Full address for service or address of registered office or of principal place of business
giving street & No. or R.R. No., municipality and postal code
*Domicile élu, adresse du siège social au adresse de l'établissement principal, y compris
la rue et le numéro, le numéro de la R.R., le nom de la municipalité et le code postal*

- * MEHDI MOEIN DARBARI

6021 YONGE STREET Suite 336

TORONTO ONTARIO
CANADA M2M 3W2

- * MEHRAN FATEMI

6021 YONGE STREET Suite 336

TORONTO ONTARIO
CANADA M2M 3W2



Form 1 - Ontario Corporation Initial Return / Notice of Change
Formule 1 - Personnes morales de l'Ontario Rapport initial / Avis de modification
Corporations Information Act / Loi sur les renseignements exigés des personnes morales

Please type or print all information in block capital letters using black ink.
Prêre de dactylographier les renseignements ou de les écrire en caractères d'imprimerie à l'encre noire.

1.	Initial Return Rapport initial	Notice of Change Avis de modification
Business Corporation/ Société par actions	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Not-For-Profit Corporation/ Personne morale sans but lucratif	<input type="checkbox"/>	<input type="checkbox"/>

For Ministry Use Only
À l'usage du ministère seulement

2. Ontario Corporation Number
Numéro matricule de la personne morale en Ontario
2127343

3. Date of Incorporation or Amalgamation/
Date de constitution ou fusion
Year/Année Month/Mois Day/Jour
2007 02 09

4. Corporation Name including Punctuation/Raison sociale de la personne morale, y compris la ponctuation
Canamidex International Corp.

5. Address of Registered or Head Office/Adresse du siège social
c/o / a/s
Canamidex International Corp.

Street No./N° civique **6021** Street Name/Nom de la rue **Yonge Street** Suite/Bureau **336**

Street Name (cont'd)/Nom de la rue (suite)

City/Town/Ville **Toronto** **ONTARIO, CANADA**

Postal Code/Code postal **M2M 3W2**

For Ministry Use Only
À l'usage du ministère seulement

6. Mailing Address/Adresse postale

Street No./N° civique

Street Name/Nom de la rue Suite/Bureau

Street Name (cont'd)/Nom de la rue (suite)

City/Town/Ville

Province, State/Province, État Country/Pays Postal Code/Code postal

Same as Registered or Head Office/
Même que siège social

Not Applicable/
Ne s'applique pas

7. Language of Preference/Langue préférée
English - Anglais French - Français

8. Information on Directors/Officers must be completed on Schedule A as requested. If additional space is required, photocopy Schedule A./Les renseignements sur les administrateurs ou les dirigeants doivent être fournis dans l'Annexe A, tel que demandé. Si vous avez besoin de plus d'espace, vous pouvez photocopier l'Annexe A.

Number of Schedule A(s) submitted/Nombre d'Annexes A présentées (At least one Schedule A must be submitted/Au moins une Annexe A doit être présentée)

9. (Print or type name in full of the person authorizing filing / Dactylographier ou inscrire le prénom et le nom en caractères d'imprimerie de la personne qui autorise l'enregistrement)

I/Je **Mehdi Moein Darbari**

Check appropriate box
Cocher la case pertinente

D) Director/Administrateur

O) Officer /Dirigeant

P) Other individual having knowledge of the affairs of the Corporation/Autre personne ayant connaissance des activités de la personne morale

certify that the information set out herein, is true and correct.
atteste que les renseignements précités sont véridiques et exacts.

NOTE/REMARQUE: Sections 13 and 14 of the Corporations Information Act provide penalties for making false or misleading statements or omissions. Les articles 13 et 14 de la Loi sur les renseignements exigés des personnes morales prévoient des peines en cas de déclaration fautive ou trompeuse, ou d'omission.

This is **Exhibit “B”** to the affidavit of Mehdi Darbari sworn before me this **24** day of June, 2022, in accordance with O. Reg. 431/20, *Administering an Oath or Declaration Remotely*

A handwritten signature in blue ink, appearing to read 'R.B. R.', is written in a cursive style.

A Commissioner, etc.



Crowe Soberman Inc.

Crowe Soberman Inc.
Licensed Insolvency Trustee
Member Crowe Global

2 St. Clair Avenue East, Suite 1100
Toronto, ON M4T 2T5
416 929 2500
416 929 2555 Fax
1 877 929 2501 Toll Free
www.crowesobermaninc.com

June 8, 2022

TO THE CREDITORS OF CANAMIDEX INTERNATIONAL CORP

Please be advised that CANAMIDEX INTERNATIONAL CORP (“**CANAMIDEX**”) filed a **Notice of Intention to Make a Proposal** on June 3, 2022, under the **Bankruptcy and Insolvency Act**. A copy of this Notice is enclosed herewith.

This is a procedure whereby a debtor, with creditor and Court approval, reorganizes its financial affairs. Our role as Proposal Trustee in this matter is to assist the debtor with the development of the Proposal, to liaise with creditors, that is, to fully explain the Proposal to them and to support and facilitate the decision-making process which creditors will ultimately undertake, ending with their acceptance or rejection of the Proposal.

All liabilities, actual and contingent, of CANAMIDEX as at June 03, 2022 are subject to the Proposal mentioned above and are fixed by Section 62(1.1) of the **Bankruptcy and Insolvency Act** as at that date.

All creditors are **STAYED** from commencing or continuing any actions against CANAMIDEX until the Proposal is dealt with by the creditors.

CANAMIDEX has thirty (30) days from the date of filing the **Notice of Intention to Make a Proposal** (subject to Court approved extensions of this time period) to lodge a Proposal with us so that we may file it with the Official Receiver.

We will be calling a meeting of creditors to consider the Proposal within twenty-one (21) days of the date on which the Proposal is filed. You will receive Notice of the meeting along with all other necessary documents including the proof of claim form, voting letter, at least ten days in advance of the meeting.

Please feel free to contact our office if you require any further information with respect to this matter.

CROWE SOBERMAN INC.
Licensed Insolvency Trustee
acting in re: the Proposal of
CANAMIDEX INTERNATIONAL CORP, a debtor

Per: Daniel Posner
Daniel Posner, CPA, CIRP



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. 31-2836316
Estate No. 31-2836316

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

CANAMIDEX INTERNATIONAL CORP

Insolvent Person

CROWE SOBERMAN INC.

Licensed Insolvency Trustee

Date of the Notice of Intention:

June 03, 2022

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: June 06, 2022, 12:27

E-File/Dépôt Electronique

Official Receiver

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

Canada

District of:
Division No. -
Court No.
Estate No.

- FORM 33 -
Notice of Intention To Make a Proposal
(Subsection 50.4(1) of the Act)

In the Matter of the Proposal of
CANAMIDEX INTERNATIONAL CORP.
of the City of Richmond Hill
in the Province of Ontario

Take notice that:

1. I, CANAMIDEX INTERNATIONAL CORP, an insolvent person, state, pursuant to subsection 50.4(1) of the Act, that I intend to make a proposal to my creditors.
2. Crowe Soberman Inc., LIT of 2 St. Clair Ave East, Suite 1100, Toronto, ON, M4T 2T5, a licensed trustee, has consented to act as trustee under the proposal. A copy of the consent is attached.
3. A list of the names of the known creditors with claims of \$250 or more and the amounts of their claims is also attached.
4. Pursuant to section 69 of the Act, all proceedings against me are stayed as of the date of filing of this notice with the official receiver in my locality.

Dated at the City of Richmond Hill in the Province of Ontario, this 27th day of May 2022.



CANAMIDEX INTERNATIONAL CORP
Insolvent Person

To be completed by Official Receiver:

Filing Date

Official Receiver

District of:
 Division No. -
 Court No.
 Estate No.

- FORM 33 -
 Notice of Intention To Make a Proposal
 (Subsection 50.4(1) of the Act)

In the Matter of the Proposal of
 CANAMIDEX INTERNATIONAL CORP.
 of the City of Richmond Hill
 in the Province of Ontario

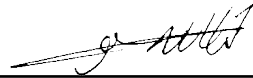
List of Creditors with claims of \$250 or more.			
Creditor	Address	Account#	Claim Amount
BMO Bank of Montreal	PO BOX 6044, STN Centre Ville Montreal QC H3C 3X2	5112420000300966	60,000.00
BMO Financial Group	1st Canadian Place - 100 King St W Toronto ON M5X 1A9		3,000,000.00
EDC Insurance	150 Slater Ottawa ON K1A 1K3		4,590.78
GS1 Canada accounts.receivable@gs1ca.org	800 - 1500 Don Mills Rd North York ON M3B 3K4		2,463.50
Jet Procurement Services	965 E Andrew Johnson Hwy Greenville TN 37745 USA		83,526.00
NSPA/NATO Amandine Bernard	11 rue de la gare L-8325 Capellen (GD Luxembourg)	LC-CH/4500451455	9,755.00
NSPA/NATO Arnaud Kindt	11 rue de la gare L-8325 Capellen (GD Luxembourg)	LC-CC/4500451506	3,700.00
NSPA/NATO Geraldine Bruguere	11 rue de la gare L-8325 Capellen (GD Luxembourg)	LD-E874500449644	15,293.00
NSPA/NATO Inge Berckmans	11 rue de la gare - L8325 Capellen (GD Luxembourg)	LW-WW/4500430528	152,313.00
NSPA/NATO Pierre-Yve Urlings	11 rue de la gare L-8325 Capellen (GD Luxembourg)	LW-WW4500450085	1,531.00
NSPA/NATO Sebastien Decroupet	11 rue de la gare L-8325 Capellen (GD Luxembourg)	LC-CC 4500442226	111,410.00
NSPA/NATO Thomas Engel	11 rue de la gare L-8325 Capellen (GD Luxembourg)	LC-CC4500447447	27,117.00
Pillsbury Winthrop Shaw Pittman LLP John Wetherell	150-11710 El Camino Real San Diego, CA 92130-2245 USA		167,117.60
Pratt & Whitney Canada	1000 Marie-Vitorin Longueuil QC J4G 1A1		38,285.00

District of:
Division No. -
Court No.
Estate No.

- FORM 33 -
Notice of Intention To Make a Proposal
(Subsection 50.4(1) of the Act)

In the Matter of the Proposal of
CANAMIDEX INTERNATIONAL CORP.
of the City of Richmond Hill
in the Province of Ontario

Total			3,677,101.88
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CANAMIDEX INTERNATIONAL CORP
Insolvent Person

- Creditor Mailing List -

In the Matter of the Proposal of
CANAMIDEX INTERNATIONAL CORP.
of the City of Richmond Hill
in the Province of Ontario

Creditor Type	Name	Attention	Address
Unsecured	BMO Bank of Montreal		5112420000300966 PO BOX 6044, STN Centre Ville Montreal QC H3C 3X2
	BMO Financial Group		1st Canadian Place - 100 King St W Toronto ON M5X 1A9 milan.maharaj@bmo.com
	EDC Insurance		150 Slater Ottawa ON K1A 1K3 support@edc.ca
	GS1 Canada	accounts.receivable@g s1ca.org	800 - 1500 Don Mills Rd North York ON M3B 3K4 Fax: (416) 510-1916 info@gs1ca.org
	Jet Procurement Services		965 E Andrew Johnson Hwy Greenville TN 37745 USA zjanzen@jetpro.net
	NSPA/NATO	Sebastien Decroupet	LC-CC 4500442226 11 rue de la gare L-8325 Capellen (GD Luxembourg) sebastien.decroupet@nspa.nato.int
	NSPA/NATO	Arnaud Kindt	LC-CC/4500451506 11 rue de la gare L-8325 Capellen (GD Luxembourg) arnaud.tkint.external@nspa.nato.int
	NSPA/NATO	Thomas Engel	LC-CC4500447447 11 rue de la gare L-8325 Capellen (GD Luxembourg) thomas.engel@nspa.nato.int
	NSPA/NATO	Amandine Bernard	LC-CH/4500451455 11 rue de la gare L-8325 Capellen (GD Luxembourg) amandine.bernard@nspa.nato.int
	NSPA/NATO	Geraldine Bruguere	LD-E874500449644 11 rue de la gare L-8325 Capellen (GD Luxembourg) geraldine.bruguere@nspa.nato.int
	NSPA/NATO	Inge Berckmans	LW-WW/4500430528 11 rue de la gare - L8325 Capellen (GD Luxembourg) inge.berckmans@nspa.nato.int
	NSPA/NATO	Pierre-Yve Urlings	LW-WW4500450085 11 rue de la gare L-8325 Capellen (GD Luxembourg) pierre-yves.urlings@nspa.nato.int
	Pillsbury Winthrop Shaw Pittman LLP	John Wetherell	150-11710 El Camino Real San Diego, CA 92130-2245 USA john.weatherell@pillsburylaw.com
	Pratt & Whitney Canada		1000 Marie-Vitorin Longueuil QC J4G 1A1 moez.mizouri@prattwhitney.com

This is **Exhibit “C”** to the affidavit of Mehdi Darbari sworn before me this **24** day of June, 2022, in accordance with O. Reg. 431/20, *Administering an Oath or Declaration Remotely*

A handwritten signature in blue ink, consisting of stylized initials and a surname, likely 'R.B. Q'.

A Commissioner, etc.

Canamidex International Corp
Cash flow Projections
For the period June 6 to August 29, 2022

For the Week Beginning:

	06-Jun	13-Jun	20-Jun	27-Jun	04-Jul	11-Jul	18-Jul	25-Jul	01-Aug	08-Aug	15-Aug	22-Aug	29-Aug	TOTAL
Cash-in	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
Sales/Accounts Receivable	19,500	19,500	19,500	19,500	19,500	19,500	19,500	19,500	19,500	19,500	19,500	19,500	19,500	253,500
Total Cash-in	19,500	19,500	19,500	19,500	19,500	19,500	19,500	19,500	19,500	19,500	19,500	19,500	19,500	253,500
Cash-out														
Rent				180					180					180
Professional fees				10,000					10,000					10,000
Bank charges and interest				15,000					15,000					15,000
Supplies/product	15,015	15,015	15,015	15,015	15,015	15,015	15,015	15,015	15,015	15,015	15,015	15,015	15,015	195,195
Fuel & Transportation Costs	585	585	585	585	585	585	585	585	585	585	585	585	585	7,605
Utilities				100					100					100
Insurance				300					300					300
Equipment lease/rental				1,500					1,500					1,500
Total Cash-out	15,600	15,600	15,600	42,680	15,600	15,600	15,600	15,600	42,680	15,600	15,600	15,600	42,680	284,040
Net Cash inflow (outflow)	3,900	3,900	3,900	(23,180)	3,900	3,900	3,900	3,900	(23,180)	3,900	3,900	3,900	(23,180)	(30,540)
Opening cash balance (Note 1)	22,178	26,078	29,978	33,878	10,698	14,598	18,498	22,398	26,298	3,118	7,018	10,918	14,818	22,178
Net Cash (above)	3,900	3,900	3,900	(23,180)	3,900	3,900	3,900	3,900	(23,180)	3,900	3,900	3,900	(23,180)	(30,540)
Closing cash (Note 2)	26,078	29,978	33,878	10,698	14,598	18,498	22,398	26,298	3,118	7,018	10,918	14,818	(8,362)	(8,362)

Notes:

- Opening cash balance consists of the following:

Combined bank balances on June 6, 2022	\$ 22,178
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- In the event of a deficit, the principals have agreed to invest the funds as needed.

CERTIFICATION

THE PURPOSE of this Statement of Projected Cash flow is to provide creditors with sufficient information to make an informed decision regarding the Proposal, and to fully disclose to the Trustee and the Official Receiver, the state of Canamidex International Corp's financial affairs. This Statement of Projected Cash flow is prepared pursuant to the requirements of sections 50.4(2)(a) and 50(6)(a) of the Bankruptcy and Insolvency Act and solely for that purpose. Dated this 13th day of June, 2022.

Per Mehdi Darbari:  authorized representative

CROWE SOBERMAN INC.
Licensed Insolvency Trustee Acting in re: Proposal of Canamidex International Corp

Per: Hans Rizarrri, CA, CPA, LIT, CIRP

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL
OF CANAMIDEX INTERNATIONAL CORPORATION, A CORPORATION
INCORPORATED UNDER THE *BUSINESS CORPORATIONS ACT* (ONTARIO)**

Estate No. 31-2836316

ONTARIO
SUPERIOR COURT OF JUSTICE
(Commercial List)

AFFIDAVIT OF MEDHI DARBARI
(sworn June 24, 2022)

GOLDMAN SLOAN NASH & HABER LLP
480 University Avenue, Suite 1600
Toronto ON M5G 1V6 Fax:
(416) 597-3370

R. Brendan Bissell - LSO #: 40354V
Tel: (416) 597-6489
Email: bissell@gsnh.com

Joël Turgeon - LSO # 80984R
Tel: (416) 597-6486
Email: turgeon@gsnh.com

Lawyers for Canamidex International Corporation

TAB 3

Draft order

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

THE HONOURABLE MR.) WEDNESDAY, THE 29th
)
JUSTICE OSBORNE) DAY OF JUNE, 2022
)

**IN THE MATTER OF THE NOTICE OF INTENTION TO
MAKE A PROPOSAL OF CANAMIDEX INTERNATIONAL
CORPORATION, A CORPORATION INCORPORATED
UNDER THE *BUSINESS CORPORATIONS ACT* (ONTARIO)**

**ORDER
(Extension of time to file a proposal)**

THIS MOTION, Canamidex International Corporation (the “**Company**”), for an order extending the time to make a proposal pursuant to the *Bankruptcy and Insolvency Act*, was heard this day via Zoom videoconference.

ON READING the Company’s motion record, the first report of Crowe Soberman Inc. in its capacity as proposal trustee of the Company (in such capacity, the “**Proposal Trustee**”), dated June ■, 2022 (the “**First Report**”), and on hearing the submissions of counsel for the Company, counsel for the Proposal Trustee, and such other counsel present as may appear on the counsel slip, no one else appearing although duly served as appears from the affidavit of service filed:

SERVICE

1. **THIS COURT ORDERS** that the time and manner of service of the motion record and factum for this motion and the First Report are hereby respectively abridged and validated such that this motion is properly returnable today.

EXTENSION OF TIME TO FILE A PROPOSAL

2. **THIS COURT ORDERS** that the time for a proposal to be filed on behalf of the Company is extended to August 17, 2022 pursuant to section 50.4(9) of the *Bankruptcy and Insolvency Act*.
 3. **THIS COURT ORDERS** that this Order is effective from its date without the requirement for issuance and entry.
-

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A
PROPOSAL OF CANAMIDEX INTERNATIONAL
CORPORATION, A CORPORATION INCORPORATED UNDER
THE *BUSINESS CORPORATIONS ACT* (ONTARIO)**

Estate No. 31-2836316

ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST
Proceeding commenced in TORONTO

ORDER
(Extension of time to file a proposal)

GOLDMAN SLOAN NASH & HABER LLP
480 University Avenue, Suite 1600
Toronto ON M5G 1V6 Fax:
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R. Brendan Bissell - LSO #: 40354V
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Email: bissell@gsnh.com

Joël Turgeon - LSO # 80984R
Tel: (416) 597-6486
Email: turgeon@gsnh.com

Lawyers for Canamidex International Corporation

TAB 4

Service List

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE
A PROPOSAL OF CANAMIDEX INTERNATIONAL
CORPORATION, A CORPORATION INCORPORATED UNDER
THE *BUSINESS CORPORATIONS ACT* (ONTARIO)**

**SERVICE LIST
(as at June 24, 2022)**

<p>GOLDMAN SLOAN NASH & HABER LLP</p> <p>480 University Avenue, Suite 1600 Toronto ON M5G 1V2 Fax: 416 597 3370</p> <p>R. Brendan Bissell (LSO# 40354V) Tel: 416 597 6489 Email: bissell@gsnh.com</p> <p>Joël Turgeon (LSO #80984R) Tel: 416 597 6486 Email: turgeon@gsnh.com</p> <p>Lawyers for Canamidex International Corporation</p>	<p>CROWE SOBERMAN INC.</p> <p>2 St. Clair Ave. E., Suite 1100 Toronto, ON M4T 2T5</p> <p>Hans Rizarri Tel: 416 963-7175 Email: hans.rizarri@crowesoberman.com</p> <p>Daniel Posner Tel: 416 644-8447 Email: daniel.posner@crowesoberman.com</p> <p>Proposal Trustee</p>
<p>SIMPSON WIGLE LAW LLP</p> <p>1006 Skyview Drive Suite 103 Burlington, ON L7P 0V1</p> <p>Bart Sarsh Tel: 905-639-1052 Ext: 235 Email: sarshb@simpsonwigle.com</p> <p>Lawyers for the Proposal Trustee</p>	<p>CHAITONS LLP</p> <p>5000 Yonge St., 10th Floor Toronto, ON M2N 7E9</p> <p>Gary Feldman Tel: 416-218-1130 Email: gary@chaitons.com</p> <p>Lawyers for Bank of Montreal</p>

ATTORNEY GENERAL OF CANADA

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Ontario Regional Office, Tax Law Section
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Email: diane.winters@justice.gc.ca

Rakhee Bhandari

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**INSOLVENCY UNIT, ONTARIO MINISTRY
OF FINANCE**

6th Floor - 33 King Street West
Oshawa ON L1H 8H5

Email: Insolvency.Unit@ontario.ca

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**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL
OF CANAMIDEX INTERNATIONAL CORPORATION, A CORPORATION
INCORPORATED UNDER THE *BUSINESS CORPORATIONS ACT* (ONTARIO)**

Estate No. 31-2836316

ONTARIO
SUPERIOR COURT OF JUSTICE
(Commercial List)

MOTION RECORD
(Extension of time to file a proposal returnable
June 29, 2022)

GOLDMAN SLOAN NASH & HABER LLP
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Lawyers for Canamidex International Corporation