



ONTARIO SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

COUNSEL/ENDORSEMENT SLIP

COURT FILE NO.: CV-25-00738613-00CL

HEARING DATE: April 24, 2026

NO. ON LIST: 1

TITLE OF PROCEEDING: 1242939 B.C. UNLIMITED LIABILITY COMPANY et al

BEFORE: JUSTICE KIMMEL

PARTICIPANT INFORMATION

For Plaintiff, Applicant, Moving Party:

Name of Person Appearing	Name of Party	Contact Info
Ashley Taylor Chloe Duggal	Counsel for the Applicants	ataylor@stikeman.com cduggal@stikeman.com

For Defendant, Respondent, Responding Party:

Name of Person Appearing	Name of Party	Contact Info
Asad Moten	Counsel for the Attorney General of Canada	Asad.Moten@justice.gc.ca
Vivian Li	Counsel for HMK in Right of Manitoba	vivian.li@gov.mb.ca
Julien Sicco	Counsel for Restore Capital LLC, in its capacity as FILO Agent	jsicco@litigate.com
Natasha MacParland	Counsel for Wittington Investments, Limited, and for the other Purchaser	nmacparland@dwpv.com

For Other, Self-Represented:

Name of Person Appearing	Name of Party	Contact Info
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Robert Renee Turpin	Self-Represented Litigant	rturpin15@gmail.com
Michael Shakra	Counsel for the Monitor	shakram@bennettjones.com
Alan Hutchens Greg Karpel	Monitor	ahutchens@alvarezandmarsal.com gkarpel@alvarezandmarsal.com

ENDORSEMENT OF JUSTICE KIMMEL:

- [1] This case conference was requested by the Applicants, to seek directions from the court regarding the sufficiency of Mr. Turpin’s motion materials that were to be delivered on Monday April 20, 2026 in accordance with the timetable for Mr. Turpin’s Proprietary Claims Motion scheduled to be heard in writing by the court’s April 13, 2026 endorsement: see *In Re Hudson's Bay Company*, 2026 ONSC 2187.
- [2] The April 13, 2026 endorsement (at para. 37) directed that:
- (a) Mr. Turpin shall serve upon the Service List and file a new Motion Record by April 20, 2026, which was to include his Notice of Motion, a Motion Record index and, among other things:
3. Evidence to be submitted by way of an affidavit or affidavits that have been sworn or affirmed in front of a commissioner or notary, with all documents to be relied upon individually identified, described, and attached as exhibits and, within the affidavit, a clear statement of the source of each document that is attached.
- [3] On April 17, 2026, Mr. Turpin sent an email that included a link to a Google Drive containing the "DEFENSE OF THE HOUSE OF TURPIN" and "THE HOUSE OF TURPIN: EVIDENCE PACKAGE" each of which had previously been emailed to the Service List and the Court, and which were before the court when the April 13, 2026 endorsement was made. Mr. Turpin's email also attached three images. The first image was of the first page of "THE HOUSE OF TURPIN: EVIDENCE PACKAGE" with a court file number handwritten on the top right corner of the page (it was not the court file number for this proceeding, and was corrected by Mr. Turpin in his subsequent email of April 20, 2026). The second and third images were of Mr. Turpin's signature on the last page of "THE HOUSE OF TURPIN: EVIDENCE PACKAGE" together with the signature of a Commissioner of Oaths dated March 26, 2026. These latter two images were also part of the material that was before the court when the April 13, 2026 endorsement was made.
- [4] On April 20, 2026, in response to an inquiry from counsel for the Applicants regarding Mr. Turpin’s Motion Record, Mr. Turpin sent an email purporting to provide the "House of Turpin Motion Record for the Proprietary Claims Motion". The email included a "NOTICE OF MOTION" and "INDEX OF RECORD" and included a link to a Google Drive containing the "DEFENSE OF THE HOUSE OF TURPIN" and "THE HOUSE OF TURPIN: EVIDENCE PACKAGE".
- [5] The Applicants note that Mr. Turpin has failed to comply with the Court's directions set forth in the April 13, 2026 endorsement, by failing to serve: (a) A new Motion Record; (b) a clear index detailing the entire evidentiary record upon which he is relying; or (c) an affidavit or affidavits with all documents to be relied upon individually identified, described and attached as exhibits and, within the affidavit, a clear statement of the source of each document that is attached. Despite noting these three areas of deficiency, what the Applicants and the Monitor are concerned about primarily is that there is no sworn affidavit that identifies

and attaches as exhibits the various documents that are referenced in Mr. Turpin's previously filed materials that he continues to refer to and rely upon in support of his motion.

[6] This case conference was convened so that the court could provide directions to Mr. Turpin about what he needs to do to remedy the noted deficiencies so that his motion can be put before the court for determination. The court provided those directions during the zoom hearing on April 24, 2026 and indicated that the specific requirements would be outlined in a written endorsement. Mr. Turpin asked that the requirements be set out in a list to assist him. The requirements are that Mr. Turpin's Motion Record should include the following documents (suggested guidance is included below):

Index - For example, the Index might read:

1. Notice of Motion
2. Defense of the House of Turpin
3. The House of Turpin: Evidence Package sworn on March 26, 2026
4. Affidavit of Robert Renee Turpin sworn on XXX, 2026
 - a. Exhibit 1 – [Name of Document]
 - b. Exhibit 2 – [Name of Document]
 - c. Exhibit 3 – [Name of Document]
 - d. Etc.

Mr. Turpin's sworn affidavit:

Should describe and attach as an exhibit each piece of documentary evidence Mr. Turpin is relying upon to support the legal positions or arguments he is advancing, including any documents referred to (whether by description or embedded link) in the Defense of the House of Turpin and The House of Turpin: Evidence Package. To be clear, this is to identify and put into evidence existing records or documents which support, underlie or back-up the positions or arguments advanced by Mr. Turpin, including the positions and arguments set forth in the Defense of the House of Turpin or The House of Turpin: Evidence Package.

This new affidavit:

- a. should clearly identify and cross-reference any document that is mentioned in the previously filed materials or that is "linked" to the previously filed materials (e.g., attach a copy of the document that someone would find if they clicked on the embedded links);
- b. should explain where Mr. Turpin obtained each document and, if a document came from someone else, the affidavit should provide a detailed explanation of Mr. Turpin's understanding of where they obtained it;
- c. should attach each identified document as a separate lettered exhibit, starting with Exhibit "A" and continuing sequentially;
- d. may identify and attach additional documents - Mr. Turpin is not restricted by the existing material; and
- e. may describe documents that Mr. Turpin has not been able to obtain and the efforts made to find them.

Some examples of documents referred to in those materials that the Applicants have identified to assist Mr. Turpin in understanding the types of documents that need to be cross-referenced, described and attached as Exhibits to his affidavit to be sworn in support of his motion are as follows:

1. In the second section of The Defense of the House of Turpin entitled “2. THE PHYSICAL SHOWING”, there is a reference to “the verified births of Eustache Turpin (1818) and Frederic Turpin (1847), documented under HBCA Archive Codes B.239/u/1 and E.5/3-6.” The sworn affidavit should attach the documents that relate to those archive references and explain the relevance of those documents to Mr. Turpin’s motion, or explain what Mr. Turpin believes would be found in the archives and what efforts he has made to access them if he has been unable to do so.
2. In the seventh section of The Defense of the House of Turpin entitled “7. WILLFUL BLINDNESS TO CROWN ARCHIVAL CODES” there are references to those same two documents as well as “RG2.7.702 (The Privy Council record of the Crown’s interest).” The sworn affidavit should attach the documents that relate to that archive reference and explain the relevance of those documents to Mr. Turpin’s motion or explain what Mr. Turpin believes would be found in the archives and what efforts he has made to access them if he has been unable to do so.
3. In Section II. THE ROLE OF JOSEPH TURPIN (THE ARCHIVAL BRIDGE) of The House of Turpin: Evidence Package, there are references to “the primary HBCA Biographical Sheet (TURPINJO Feb 1987)” as well as the following “file”: F.4.32a: North West Company (NWC) Ledger, E.5/3-6: Red River Census Returns, B115/d/7: Lower Red River District Post Journals and B.239/g/1-2: York Factory District Abstract of Servants’ Accounts. The sworn affidavit should attach these documents and explain their relevance to Mr. Turpin’s motion.

[7] Mr. Turpin is self-represented and there was no opposition to the court granting him additional time to provide the necessary evidence and to organize and index his Motion Record. Mr. Turpin indicated that he would require no more than a week to do so. As was discussed at the case conference, the court orders the following amendments to the timetable in paragraph 37 of the April 13, 2026 endorsement:

- (a) May 8 (extended from April 20), 2026 shall be the new deadline for Mr. Turpin’s Motion Record (including a new sworn affidavit to identify documents by attaching them as exhibits and a new index to identify all materials relied upon by Mr. Turpin for his Proprietary Claims Motion), to be prepared in accordance with the guidance in the immediately preceding paragraph of this endorsement (above).
- (b) May 20 (extended from April 27), 2026 shall be the new deadline for Mr. Turpin to deliver his factum.
- (c) June 5 (extended from May 4), 2026 shall be the new deadline for the Applicants and any interested stakeholder (including, without limitation, the purchasers and recipients of the HBC Charter) to serve and file responding motion record(s).
- (d) June 15 (extended from May 14), 2026 shall be the new deadline for Mr. Turpin to deliver a reply motion record with any further affidavit evidence relied upon by him and a reply factum (if he wishes to do so, these are not required).
- (e) June 22 (extended from May 21), 2026 shall be the new deadline for the Monitor to serve and file a report to address Mr. Turpin's Proprietary Claims and his motion, together with its factum.

(f) June 29 (extended from May 29), 2026 shall be the new deadline for Mr. Turpin to deliver a sur-reply Motion Record and factum to respond to anything he feels he needs to in the Monitor's responding material.

(g) July 2 (extended from May 29), 2026 shall be the new date for the hearing bundle that will be created in Case Center for an in-writing hearing, so that the motion material can be read on or after July 2, 2026 (also extending the May 29 date referred to in sub-paragraph (h)).

[8] Everything else contained in the April 13, 2026 endorsement that has not been amended by the above extended deadlines shall remain in place and in effect.

[9] The Applicants shall send a copy of this endorsement to the Service List so that all stakeholders are aware of the change in the timetable for Mr. Turpin's Proprietary Claims Motion.

Date: April 27, 2026

A handwritten signature in black ink that reads "Kimmel J." is enclosed within a thin black rectangular border.

Jessica Kimmel