

Court File No. CV-24-00717340-00CL
IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED AND IN THE MATTER
OF A PLAN OF COMPROMISE OR ARRANGEMENT OF PRIDE GROUP HOLDINGS INC. et al.

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT
TORONTO

**AFFIDAVIT OF DOUGLAS MCINTOSH
(SWORN NOVEMBER 10, 2025)**

Cassels Brock & Blackwell LLP
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance Street
Toronto, ON M5H 0B4

R. Shayne Kukulowicz LSO#: 30729S
Tel: 416.860.6463
skukulowicz@cassels.com

Natalie E. Levine LSO#: 64908K
Tel: 416.860.6568
nlevine@cassels.com

Eva-Louise A. A. Hyderman LSO#: 90084W
Tel: 416.860.2920
ehyderman@cassels.com

Lawyers for the Manager

APPENDIX “D”

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, C., C-36, AS AMENDED**

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF
PRIDE GROUP HOLDINGS INC. and those Applicants listed on Schedule "A" hereto (each,
an "**Applicant**", and collectively, the "**Applicants**")

AFFIDAVIT OF COLIN D. PENDRITH
(sworn November 10, 2025)

I, Colin D. Pendrith, of the City of Toronto, in the Province of Ontario, **MAKE OATH AND SAY:**

1. I am a lawyer qualified to practice law in Ontario and a Partner with Cassels Brock & Blackwell LLP ("**Cassels**"), counsel to Alvarez & Marsal Canada Inc., in its capacity as Court-appointed manager (the "**Manager**") appointed pursuant to the Syndicate Collateral Management Order of the Ontario Superior Court of Justice (Commercial List) granted in these proceedings on October 17, 2024, as amended November 1, 2024, and February 4, 2025. As such, I have knowledge of the matters to which I depose.
2. During the period from August 2, 2024, to September 30, 2025, Cassels incurred fees and disbursements, including Harmonized Sales Tax ("**HST**"), in the amount of \$2,735,322.69. Particulars of the work performed are contained in the invoices (each, an "**Invoice**", and collectively, the "**Invoices**") attached hereto as **Exhibit "A"**. The Invoices have been redacted to preserve matters subject to solicitor-client privilege and confidentiality.
3. Attached hereto as **Exhibit "B"** is a summary of each Invoice in Exhibit "A", including the total billable hours charged per Invoice, the total fees charged per Invoice and the average hourly rate charged per Invoice. The average hourly rate charged by Cassels was \$603.43.

4. Attached hereto as **Exhibit “C”** is a summary of the respective years of call and average billing rates of each individual at Cassels who acted for the Manager, as the case may be.

5. To the best of my knowledge, the rates charged by Cassels throughout the course of these proceedings are comparable to the rates charged by other law firms in the Toronto market for the provision of similar services, and the rates charged by Cassels for services rendered in similar proceedings.

6. I make this affidavit in support of a motion for, *inter alia*, approval of the fees and disbursements of counsel to the Manager, and for no other or improper purpose.

SWORN BEFORE ME by video conference on this 10th day of November, 2025. The affiant and I both were located in the City of Toronto in the Province of Ontario. This affidavit was commissioned remotely in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



A commissioner for Taking Affidavits
(or as may be)



Colin D. Pendrith

Commissioner Name: Eva-Louise A.A.
Hyderman
Law Society of Ontario Number: 90084W

This is Exhibit "A" referred to in the affidavit of Colin D. Pendrith, affirmed before me by videoconference on November 10, 2025, in accordance with O. Reg. 431/20. The affiant was located in the City of Toronto in the Province of Ontario and I was located in the City of Toronto in the Province of Ontario



.....
A Commissioner for Taking Affidavits

Commissioner Name: Eva-Louise A.A.
Hyderman

Law Society of Ontario Number: 90084W

EXHIBIT “A”

**Copies of the Invoices issued to the Manager
for fees and disbursements incurred by
Cassels Brock & Blackwell LLP**



Attn: Douglas McIntosh
Alvarez
Royal Bank Plaza, South Tower
200 Bay Street, Suite 2900, P.O. Box 22
Toronto, ON M5J 2J1

Invoice No: 2258959
Date: November 20, 2024
Matter No.: 059366-00005
GST/HST No.: R121379572

Lawyer: Kukulowicz, Shayne
Tel.: (416) 860-6463
E-mail: SKukulowicz@cassels.com

Re: Court-appointment as Manager of certain assets of the Pride Group

Fees for professional services rendered up to and including September 30, 2024

Our Fees	71,502.00
Disbursements	178.79
Total Fees and Disbursements	71,680.79
HST @ 13.00%	9,318.50
TOTAL DUE (CAD)	80,999.29

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Payment due upon receipt. Please return remittance advice(s) with cheque.

REMITTANCE ADVICE: Email payment details to payments@cassels.com

CAD EFT and Wire:

Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1

Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

Online Bill Payments:

Vendor name is **Cassels Brock Blackwell LLP** and
you are required to enter the first six digits of the
matter #

Invoice No: 2258959
Matter No.: 059366-00005

Amount: **CAD 80,999.29**

e-Transfer Payments: payments@cassels.com

Credit Card Payments: payments.cassels.com

Cassels Brock Blackwell LLP | cassels.com

Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL			
Date	Name	Description	Hours
Aug-02-24	J. Dietrich	Review of draft materials and provide comments on same; discussion with N. Levine regarding comments; discussion with D. McIntosh; discussion with Fasken regarding comments on draft order; review of revised order; discussion with D. McIntosh and exchange of email regarding same;	3.30
Aug-02-24	N. Levine	Comment on motion materials; calls with client and appointing creditors' counsel;	3.70
Aug-07-24	N. Levine	Review additional motion record;	0.10
Aug-13-24	J. Dietrich	Review of draft service agreement and email exchange regarding same;	0.60
Aug-13-24	N. Levine	Comment on IFT contract; correspond with client regarding same;	1.30
Aug-14-24	N. Levine	Comment on agreement; calls with client;	1.90
Aug-14-24	J. Dietrich	Discussion with A&M regarding status and service agreements; review of email regarding revised agreement terms;	0.90
Aug-15-24	N. Levine	Comment on agreements; consider precedents; discussions with Fasken and A&M regarding same;	2.10
Aug-16-24	N. Levine	Calls with appointing stakeholder counsel; calls with client; review comments on agreement; discuss same with client; correspondence regarding additional agreements;	1.30
Aug-19-24	N. Levine	Correspondence with Cassels team regarding lift stay motions; confer with client regarding same;	0.40
Aug-20-24	N. Levine	Supervise student work regarding lift stay motion; review same;	0.30
Aug-22-24	N. Levine	Call with RBC counsel; correspondence regarding agreements;	0.30
Aug-23-24	N. Levine	Review motion records;	0.20
Aug-24-24	J. Dietrich	Review of emails;	0.10
Aug-26-24	N. Levine	Review dealer comments; correspondence regarding September 3 hearing; review chart;	0.50
Sep-06-24	N. Levine	Call with S. Kukulowicz; call with team;	0.30
Sep-06-24	S. Kukulowicz	Review of IFT Servicing Agreement and discussed background with J. Dietrich; telephone attendance with N. Levine regarding background and status;	1.50
Sep-06-24	M. Clarkson-Maciel	Analysis of applicant structure and effect on Manager appointment; consider key issues of the same;	1.10
Sep-10-24	N. Levine	Correspond with client;	0.10
Sep-11-24	N. Levine	Call with client; call with S. Kukulowicz; consider update; prepare for meeting; meet with M. Clarkson-Maciel; review materials; call with client; review agreement;	2.00
Sep-11-24	M. Clarkson-Maciel	Review of monitor's reports and prepare analysis of reports and court materials.	5.60

Date	Name	Description	Hours
Sep-11-24	S. Kukulowicz	Review of background and mediation documentation; review of court materials regarding the appointment of A&M as "Manager" of the Syndicate Collateral;	2.50
Sep-12-24	N. Levine	Review motion materials; calls with client regarding contract; prepare for call;	1.90
Sep-12-24	M. Clarkson-Maciel	Review of Dealer agreements; prepare analysis on court materials and documents;	4.50
Sep-12-24	N. Geary	Review and comment on draft consignment sale agreement; call with client;	2.20
Sep-12-24	S. Kukulowicz	Review of "Remarketing Program - Dealer Agreement" and proposed revisions; office conference call with N. Levine regarding status;	0.60
Sep-13-24	N. Levine	Prepare for call with client; calls with Cassels team; review background materials;	1.90
Sep-13-24	S. Kukulowicz	Teams meeting regarding background of Pride Group and indebtedness; review of follow up emails;	1.30
Sep-13-24	M. Clarkson-Maciel	Prepare analysis of monitor report contents and effect on proposed structure; conference with N. Levine and S. Kukulowicz regarding group structure, background and Manager role;	5.00
Sep-15-24	N. Levine	Call with client and bank counsel;	0.70
Sep-15-24	S. Kukulowicz	Conference call regarding Pride collateral management issues with A&M and Faskens;	0.60
Sep-18-24	N. Levine	Review record; review materials; review past materials and correspond with client;	2.10
Sep-18-24	M. Clarkson-Maciel	Analysis regarding monitors reports and structure of group; its affect on appointment of Manager;	1.40
Sep-19-24	N. Levine	Review materials; call to client regarding hearing;	0.70
Sep-19-24	S. Kukulowicz	Review of Applicants' motion record and Monitor's Second Report;	1.40
Sep-23-24	N. Levine	Correspond with counsel to lenders;	0.10
Sep-24-24	S. Kukulowicz	Review of additional court materials;	0.70
Sep-25-24	N. Geary	Call with client regarding Sale and Auction Agreement;	0.60
Sep-25-24	M. Clarkson-Maciel	Review draft orders and Tiger agreement for sale of assets; draft and mark-up of Tiger agreement;	4.00
Sep-25-24	S. Kukulowicz	Review of further court materials and revised order; conference call with E. Allin and E. Mann from A&M regarding update;	0.80
Sep-25-24	N. Levine	Review motion materials; calls with client; review contract;	2.00
Sep-26-24	N. Levine	Revise Tiger agreement; correspondence regarding dealer agreements; brief review of update materials;	1.50
Sep-26-24	M. Clarkson-Maciel	Draft and markup of Tiger agreement;	1.60
Sep-26-24	N. Geary	Review and comment on draft Sale and Auction Agreement;	1.10
Sep-26-24	S. Kukulowicz	Review of further court materials;	0.80
Sep-27-24	M. Clarkson-Maciel	Draft Sale and Auction Agreement between A&M and Tiger;	1.20

Date	Name	Description	Hours
		consider and review draft order for approval of said Agreement;	
Sep-27-24	N. Levine	Call with dealer; call with client and revise agreement per client comments; discussion with client regarding same; revise and comment on proposed order;	1.90
Sep-27-24	N. Geary	Calls with teams regarding agreements;	1.30
Sep-30-24	M. Clarkson-Maciel	Draft Tiger sale and consulting agreement;	1.30
Sep-30-24	M. Clarkson-Maciel	Review draft order for appointment of Manager; call with team regarding status of transaction;	1.50
Sep-30-24	N. Levine	Comment on order; confer with counsel to lenders; review endorsement; call with Cassels team regarding order and agreements; consider next steps; call with client regarding timing;	2.00
Sep-30-24	S. Kukulowicz	Review of draft Dealer Agreement and Sale Approval Order; teams conference with N. Levine and M. Clarkson-Maciel; review of decision regarding funding;	1.60

FEE SUMMARY				
Name	Title	Hours	Rate	Amount
Clarkson-Maciel, Matteo	Business Advisor	27.20	700.00	19,040.00
Geary, Nicola	Partner	5.20	925.00	4,810.00
Levine, Natalie	Partner	29.30	975.00	28,567.50
Kukulowicz, Shayne	Partner	11.80	1,200.00	14,160.00
Dietrich, Jane	Partner	4.90	1,005.00	4,924.50
Total (CAD)		78.40		71,502.00
Our Fees		71,502.00		
HST @ 13.00%		9,295.26		
TOTAL FEES & TAXES (CAD)				80,797.26

DISBURSEMENT SUMMARY	
Taxable Disbursements	
Binding, Tabs, Disks, etc	32.79
West Law - Online Searches	146.00
Total Taxable Disbursements	178.79
HST @ 13.00%	23.24
Total Taxable Disbursements & Taxes	202.03

Cassels Brock & Blackwell LLP
Alvarez
Re: Court-appointment as Manager of certain assets of the Pride
Group

Page 5 of 5
Invoice No: 2258959
Matter No. 059366-00005

TOTAL DISBURSEMENTS & TAXES (CAD)	202.03
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TOTAL FEES	71,502.00
TOTAL DISBURSEMENTS	178.79
TOTAL TAXES	9,318.50
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	80,999.29



Attn: Douglas McIntosh
Alvarez
Royal Bank Plaza, South Tower
200 Bay Street, Suite 2900, P.O. Box 22
Toronto, ON M5J 2J1

Invoice No: 2260158
Date: November 28, 2024
Matter No.: 059366-00005
GST/HST No.: R121379572

Lawyer: Kukulowicz, Shayne
Tel.: (416) 860-6463
E-mail: SKukulowicz@cassels.com

Re: Court-appointment as Manager of certain assets of the Pride Group

Fees for professional services rendered up to and including October 31, 2024

Our Fees	327,959.50
Disbursements	3,809.81
Total Fees and Disbursements	331,769.31
HST @ 13.00%	43,011.87
TOTAL DUE (CAD)	374,781.18

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Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1

Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

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matter #

Invoice No: 2260158
Matter No.: 059366-00005

Amount: **CAD 374,781.18**

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FEE DETAIL			
Date	Name	Description	Hours
Oct-01-24	M. Clarkson-Maciel	Draft Tiger Agreement; review Dealer Agreements; call with client on next steps;	4.10
Oct-01-24	N. Geary	Review and comment on agreement form;	0.30
Oct-01-24	N. Levine	Correspond with client regarding agreements; comment on same; call with client regarding next steps;	1.60
Oct-02-24	M. Clarkson-Maciel	Amend draft of Tiger Agreement; review Dealer Agreements;	2.20
Oct-02-24	S. Kukulowicz	Review of proposed revisions to draft Tiger Sale Agreement;	0.30
Oct-02-24	N. Geary	Review and comment on revised draft agreement;	0.30
Oct-02-24	N. Levine	Review contracts and correspond with client; call with client regarding cash flow;	0.50
Oct-03-24	B. Solhi	Review of Dealer Agreement and Sale and Auction Agreement for tax aspects; conference call with N. Geary and M. Clarkson-Maciel to discuss questions and outline potential issues; further correspondence with Cassels tax team to begin on tax provisions to the agreements;	2.40
Oct-03-24	M. Clarkson-Maciel	Amend Tiger Agreement Draft, Draft Order, and Velocity Dealer Agreement; call with Sales Tax team regarding tax-specific amendments;	5.00
Oct-03-24	S. Kukulowicz	Review of additional revisions to Tiger Agreement; review of emails regarding tax issues on disposal of assets;	1.10
Oct-03-24	T. Li Parizeau	Review corresponding and consider tax implication and review agreements;	0.30
Oct-03-24	N. Geary	Review and comment on revised agreement; call with B. Solhi and M. Clarkson-Maciel regarding tax issues;	0.90
Oct-03-24	N. Levine	Correspond with client; review contract questions;	0.30
Oct-04-24	T. Li Parizeau	Consider tax implication and review agreements;	1.20
Oct-04-24	B. Urquhart	Receive instructions regarding indirect tax/commodity tax aspects of business arrangement; consider implications regarding same; review agreements; perform research and identify appropriate contract language;	0.80
Oct-04-24	M. Clarkson-Maciel	Call with tax team regarding next steps. Tax Analysis; amendments to Tiger Agreement Drafting.	3.90
Oct-04-24	N. Levine	Call with client; confer with Cassels team regarding tax issues; comment on agreements; review correspondence regarding order; consider correspondence and precedent orders;	0.90
Oct-04-24	S. Kukulowicz	Exchanged emails with N. Levine regarding various issues and timing; review of emails regarding tax analysis;	1.10
Oct-05-24	N. Levine	Review draft letter and confer with Cassels team regarding same;	0.20
Oct-06-24	N. Levine	Review motion materials; confer with Cassels team regarding same;	0.20
Oct-07-24	M. Clarkson-Maciel	Review tax comments; draft the agreements to reflect the	2.00

Date	Name	Description	Hours
		same; correspondence with the client regarding next steps; conference with client and tax team regarding tax comments to agreements;	
Oct-07-24	B. Urquhart	Consider GST/HST insolvency rules; revise agreement language and comment on same;	2.60
Oct-07-24	B. Solhi	Internal correspondence with Cassels tax team pertaining to revisions to the Agreements and consideration of tax aspects; revisions and notes to draft for tax aspects; Attendance at conference call to discuss sales tax revisions with A&M team and Cassels team;	2.10
Oct-07-24	S. Kukulowicz	Review of emails regarding tax issues; review of proposed revisions to Collateral Management Order;	0.80
Oct-07-24	T. Li Parizeau	Call with B. Solhi; call with N. Levine;	1.10
Oct-07-24	N. Levine	Follow up on changes; correspondence review orders; call with Cassels team regarding tax; review agreements; call with client and sales tax team;	1.80
Oct-08-24	M. Clarkson-Maciel	Review tax comments to Dealer Agreement and Tiger Agreement; amend Tiger and Dealer Agreements to reflect client comments and tax comments; correspondence with client on the same;	2.00
Oct-08-24	B. Solhi	Further revisions to draft agreements and internal correspondence with Cassels tax;	0.40
Oct-08-24	M. Clarkson-Maciel	Extensive drafting and aligning numerous dealer agreements to ensure comments across all agreements reflect comments from client, counsel to the secured creditors and Cassels tax team;	5.50
Oct-08-24	S. Kukulowicz	Review of revised CMO and provided comments; office conference with M. Clarkson-Maciel regarding tax and other issues;	1.30
Oct-08-24	N. Levine	Review orders and call with client; comment on materials and contracts; work on agreements; calls with lender counsel; call with M. Clarkson-Maciel; review orders and agreements;	2.00
Oct-08-24	B. Urquhart	Revise tax language in Agreements; attend to same;	2.20
Oct-09-24	M. Clarkson-Maciel	Amend draft Tiger Agreement following client comments; review of counter-party draft; correspondence with N. Levine regarding how to address certain counter-party comments in the Agreement requiring the client to certify bill of sales;	1.20
Oct-09-24	S. Kukulowicz	Review of Monitor's report and other stakeholder filings regarding funding issue;	1.20
Oct-09-24	N. Geary	Review and comment on proposed changes to agreement;	0.30
Oct-09-24	N. Levine	Correspondence regarding amendments to agreements; review motion record;	0.90
Oct-10-24	M. Clarkson-Maciel	Attending motion hearing; draft of agreements following comments from counter-parties; conference with team regarding next steps and effect of motion hearing on client;	4.20

Date	Name	Description	Hours
Oct-10-24	S. Kukulowicz	Monitored court hearing;	1.00
Oct-10-24	T. Li Parizeau	Email to N. Levine; email to client regarding withholding;	0.50
Oct-10-24	N. Levine	Confer with client regarding agreements; consider responses from counterparties; review proposals; consider revised order;	1.30
Oct-11-24	M. Clarkson-Maciel	Draft sale order, Collateral Manager Order, Tiger Agreement; amendments to the same; attend call with client and Tiger Agreement counter-party to understand requests for title certificate; various correspondence with counsel to the secured lenders in respect of the aforementioned orders; conference with tax team regarding tax wording in the Tiger Agreement;	8.30
Oct-11-24	T. Li Parizeau	Review revised order;	0.20
Oct-11-24	N. Geary	Review of revised agreement;	0.10
Oct-11-24	S. Kukulowicz	Review of draft orders and provided comments; various discussions and emails with N. Levine, S. Brotman et al.	2.20
Oct-11-24	N. Levine	Revise agreements; revise orders; calls with Cassels team and Fasken team regarding materials and next steps; consider revised Turnover Order and process;	3.30
Oct-11-24	B. Urquhart	Discussions with insolvency team regarding GST/HST matters; consideration of same;	0.90
Oct-12-24	M. Clarkson-Maciel	Draft Tiger Agreement following commercial negotiation between client and Tiger;	1.40
Oct-13-24	S. Kukulowicz	Review of revisions to Sale Agreement and Sale Approval Order and related emails;	1.10
Oct-13-24	N. Levine	Revise orders; correspondence with RBC counsel and client regarding same;	1.10
Oct-14-24	S. Kukulowicz	Review of emails regarding draft orders;	0.40
Oct-15-24	M. Clarkson-Maciel	Prepare precedent agreements related to secured lender Collateral Manager Order; conference with client regarding applicant's proposed amendments to draft order;	2.50
Oct-15-24	S. Kukulowicz	Review of emails regarding Schedule "B" VINs and turnover mechanics; teams conference with A&M regarding CMO and turnover issues; review of revised CMO;	2.30
Oct-15-24	N. Levine	Review orders and affidavits; call with client; prepare for call with company; consider next steps; consider changes to agreements;	2.60
Oct-16-24	T. Li	Correspondence with C. Potter in respect of client engagement as Manager and initial lending call;	0.10
Oct-16-24	M. Clarkson-Maciel	Draft Dealer Agreements; attend negotiations with Dealer Agreement counter-party regarding outstanding points; draft and review syndicate Collateral Management Order and Sale Agreement and Approval Order; numerous correspondence with client regarding the same; conference regarding financing arrangements;	7.30
Oct-16-24	C. Potter	Preliminary discussions regarding Initial Order and related legal issues; review and consider matters relating to	1.00

Date	Name	Description	Hours
		commercial consignment liens and review of draft Dealer Agreement with respect to the same;	
Oct-16-24	S. Kukulowicz	Zoom conference with counsel for Pride, EY, the lender syndicate and A&M regarding draft orders; review of revised versions of SMO and court materials; follow-up discussions; review of revised Sale Agreement Order;	3.80
Oct-16-24	N. Levine	Revise orders; calls with Company and Monitor; prepare for hearing; mark up orders and materials; prepare for service; comment on motion materials;	6.70
Oct-17-24	T. Li	Review of supplemental motion record; review of VINs and discussion with J. Noel in respect of initial due diligence, transaction history and proceedings; review and consider PPSA and priority matters;	3.00
Oct-17-24	J. Noel	Discussions with T. Li, C. Potter and J. Fleisher regarding next steps; review motion record;	1.40
Oct-17-24	M. Clarkson-Maciel	Attend hearing for the appointment of client as Manager; prepare filing and hearing documents regarding the same; consider draft order language; draft Dealer Agreements following client review; numerous correspondence with counsel for the syndicate lenders regarding the order;	6.00
Oct-17-24	C. Potter	Preliminary matters regarding [REDACTED]; meet with J. Noel to discuss the same; correspondence regarding matters relating to the initial order;	0.60
Oct-17-24	S. Kukulowicz	Preparation for and attended Pride hearing for CMO and Sales Agreement Order; various discussions and emails regarding CMO order and schedule of VINs;	3.10
Oct-17-24	N. Levine	Prepare for court; participate in hearing; negotiate changes to order; calls with client; calls with lender counsel; review agreements;	4.70
Oct-18-24	J. Noel	Discussions with T. Li and C. Potter regarding next steps;	0.40
Oct-18-24	M. Clarkson-Maciel	Draft letter to pride entities on behalf of the client regarding turnover arrangements; conference with Cassels legal team regarding next steps; conference with client regarding next steps, discussion on Dealer Agreements, letter to pride entities, and agreement implementation; various draft amendments to the Dealer Agreement and the Tiger Agreement;	5.70
Oct-18-24	J. Fleisher	Matters regarding Pride notices required to be sent under PPSA depending on structure;	0.40
Oct-18-24	N. Levine	Confer with Cassels team regarding letter and agreements; confer with client regarding mechanics; correspondence with client and lenders' counsel regarding orders;	0.80
Oct-18-24	S. Kukulowicz	Review of emails regarding settling CMO and schedule "B"; teams conference with A&M regarding formal request to resolve VINs subject to Turnover Order;	1.40
Oct-19-24	M. Clarkson-Maciel	Draft letter to Monitor and Company on behalf of the Manager regarding collection of vehicles and missing assets;	1.80

Date	Name	Description	Hours
Oct-19-24	S. Kukulowicz	Review of draft letter regarding turnover mechanics;	0.20
Oct-20-24	M. Clarkson-Maciel	Draft letter to Pride entities on behalf of the client regarding turnover arrangements;	2.50
Oct-20-24	S. Kukulowicz	Review of draft letter and comments/questions from N. Levine; teams conference to settle terms of letter requesting turnover VINs;	0.80
Oct-20-24	N. Levine	Revise letter; correspond with client; call with Cassels team;	1.00
Oct-21-24	S. Rothery	Receive instructions from J. Noel and T. Li regarding PPSA registrations for vehicles involved in remarketing program; request access to confidentiality wall;	0.20
Oct-21-24	J. Noel	Call with T. Li and C. Potter regarding Dealer Agreements and PPSA next steps; research [REDACTED]; review corporate profile reports for dealers; discussions with Cassels team regarding [REDACTED]; review schedules to Dealer Agreements;	4.40
Oct-21-24	T. Li	Call with working group in respect of Dealer Agreements and consignment arrangements to be entered into between Manager and dealers; coordinate and correspond with Calgary lending team in respect of PMSI notices and draft PPSA registration; prepare form of consignment PPSA registration for consideration by Calgary lending specialists; discussions with S. Joneja regarding [REDACTED]; initial meeting with J. Noel and S. Rothery to discuss due diligence, PMSI and PPSA registration workstreams; correspondence and call with J. Trinh in respect of [REDACTED]; correspondence with Manager in respect of [REDACTED] and review of same; send initial due diligence inquiries to client and review responses; attend to other personal property security matters;	6.60
Oct-21-24	Im, Anita	Receive and review instructions; conduct preliminary searches; attending to corporate searches in respect of VTC Canada Holding Inc., First Truck Centre Inc., P&R Truck Centre Ltd., Brandt Tractor Ltd., Ryson Equipment Sales ULC, Metro Freightliner Hamilton Inc., and Performance Equipment Ltd.; obtain copies of corporate documents; review search results and prepare report with respect to same; email correspondence with working group;	1.60
Oct-21-24	M. Clarkson-Maciel	Draft Dealer Agreements; review drafts prepared by team; numerous correspondence with client regarding the same; correspondence with counsel to Monitor and Pride entities;	6.80
Oct-21-24	S. Joneja	Review and prepare email correspondence in connection with enquiries regarding consignment under the PPSA (Alberta);	1.00

Date	Name	Description	Hours
Oct-21-24	J. Fleisher	Matters regarding consignment agreement and registration under the PPSA of various provinces;	0.90
Oct-21-24	J. Fleisher	Call regarding t [REDACTED];	0.40
Oct-21-24	S. Kukulowicz	Dealing with letter regarding turnover VINs; discussions with N. Levine et al. regarding sales of VINs and implementation of orders;	1.40
Oct-21-24	N. Geary	Review and comment on Dealer Agreements; call with client;	2.40
Oct-21-24	N. Levine	Review agreements for execution; calls with client and lender counsel regarding execution of mandate; calls with Cassels team regarding strategy, US matters and technical steps required; correspondence with company and Monitor counsel regarding outstanding issues with assets; confer with lending colleagues regarding registration issues;	5.10
Oct-21-24	C. Potter	Preliminary review of Dealer Agreements and discussion with N. Levine regarding the same; research regarding commercial consignment and call with J. Noel and T. Li regarding the same; matters regarding Alberta legislation and review and consider the same;	1.60
Oct-22-24	E. Hyderman	Review and finalize Dealer Agreements; distribute Dealer Agreements to parties to execute virtually; discussions with M. Clarkson-Maciel and N. Levine regarding same;	2.70
Oct-22-24	S. Rothery	Receive instructions from J. Noel and T. Li regarding PPSA matters; attend to PPSA matters;	2.20
Oct-22-24	J. Noel	Request and review PPSA searches per PMSI notice requirements; discussions with Cassels team regarding diligence review and PMSI notice letters; call with Cassels team and A&M regarding PPSA requirements;	6.40
Oct-22-24	C. Potter	Call with A&M regarding consignment liens and related matters; review of matters relating to Inventory PMSIs and correspondence regarding the same; matters regarding Alberta registrations and correspondence regarding the same; engagement of Saskatchewan agent and correspondence regarding the same;	2.60
Oct-22-24	T. Li	Coordinate personal property due diligence and correspondence with clerks and associates in working group regarding same; review initial due diligence search results and corporate profiles; discussion with working group in respect of scoping and jurisdictions of due diligence investigations in light of potential dealer locations; review searches returned in respect of dealers' jurisdictions of incorporation and identify parties entitled to PMSI notices; collaboration with J. Noel and S. Rothery to organize and index due diligence results received to date and identification of gating due diligence questions for client; prepare and send follow-up inquiries to client in respect of motor vehicles and provinces in which such collateral will be held for sale; correspondence with S. Joneja in respect of	12.10

Date	Name	Description	Hours
		[REDACTED]; review and prepare form of PMSI notice; correspondence with clerks and working group in respect of i [REDACTED]; statutory research under Ontario, British Columbia and Alberta PPSAs and regulations thereto as to form and content requirements for inventory PMSI registrations; correspondence with E. Hyderman in respect of draft Dealer (remarketing) Agreements and review of updated VIN schedules thereto; correspondence with client and attend to other personal property security matters;	
Oct-22-24	S. Joneja	Review and prepare email correspondence in connection with PPSA matters relating to consignment agreement; attendance at conference call; review and prepare suggested amendments to PPSA financing statement;	1.20
Oct-22-24	Im, Anita	Receive and review further instructions; Attending to Alberta, British Columbia, Ontario, and Saskatchewan PPSA searches in respect of VTC Canada Holdings Inc., First Truck Centre Inc., P&R Truck Centre Ltd., Brandt Tractor Ltd., Ryson Equipment Sales ULC, Metro Freightliner Hamilton Inc., and Performance Equipment Ltd; review search results and prepare report with respect to same; email correspondence with working group;	0.80
Oct-22-24	M. Clarkson-Maciel	Numerous correspondence on Dealer Agreement and Tiger Agreement; call with client regarding the same and next steps; overseeing dealer agreement implementation; correspondence with finance team regarding PPSA registration;	5.00
Oct-22-24	J. Fleisher	Further discussion of registration matters in Alberta and BC to perfect interest;	1.70
Oct-22-24	J. Fleisher	[REDACTED];	0.50
Oct-22-24	S. Kukulowicz	Telephone attendance with N. Levine regarding various logistical and title conveyance issues; Teams meeting with A&M on various registration and dealer issues; review of draft Tiger Agreement;	2.40
Oct-22-24	N. Geary	Call with Cassels team and client regarding agreements; review of performance bond; review and comment on sale agreement;	1.80
Oct-22-24	N. Levine	Review and comment on bond matters; comment on agreements; finalize same; confer with client and Cassels team regarding consignment issues	4.00
Oct-23-24	E. Hyderman	Discussions with team regarding delivery of Dealer Agreements; discussions with N. Levine, C. Potter, T. Li, and J. Noel regarding the application of Personal Property Acts to consignment agreements in British Colombia, Alberta, and Ontario; legal research to determine how courts in British Colombia, Alberta, and Ontario determine if an agreement is a consignment agreement subject to each	6.40

Date	Name	Description	Hours
		jurisdiction's respective Personal Property Acts; draft research memo communicating results of said research; discussion with T. Li regarding the deal agreements pending execution;	
Oct-23-24	S. Rothery	Receive instructions from J. Noel and T. Li regarding PPSA matters; attend to PPSA matters; prepare PPSA security interest notices in respect of the Consignment Agreement between the Manager and the Debtors;	9.00
Oct-23-24	C. Potter	Matters regarding collateral located in Saskatchewan and correspond with counsel regarding perfection of the same; matters relating to collateral located in Manitoba and correspond with counsel regarding perfection of the same; attend to matters relating to PMSI registrations in British Columbia, Ontario and Alberta and review of documentation and protocol regarding the same; call with counsel to Dealer regarding process for discharging liens on disposed assets in connection with the Court Order; call with client regarding PMSI registration matters;	3.90
Oct-23-24	T. Li	Meetings and correspondence with working group in respect of PPSA searches received to date; review of PPSA searches received in Alberta, British Columbia and Saskatchewan; discussions with J. Noel and S. Rothery in respect of certain search results; research treatment of various PPSA matters under Saskatchewan and Manitoba PPSAs; review of form of PMSI notice and draft for Ontario, British Columbia and Alberta; review execution version of Dealer (remarketing) Agreement and discussions with working group regarding same; correspondence with S. Joneja in respect of Alberta PPSA registration and treatment of serial numbered goods; further review of Dealer Agreement to consider and confirm consignment provisions and mechanics are aligned with proposed Alberta and British Columbia PPSA registration language; discussions with C. Potter and J. Fleisher in respect of extra-provincial counsel; calls and correspondence with Manitoba counsel in respect of CCAA proceedings, Manager and other queries required for Manitoba PPSA registration and PMSI notices; consider [REDACTED]; [REDACTED]; review treatment and classification of motor vehicle / serial numbered goods under various provincial PPSAs and the regulations thereto correspondence with E. Hyderman in respect of caselaw research [REDACTED]; [REDACTED]; correspondence with client and attend to other personal property security matters;	14.80
Oct-23-24	J. Noel	Review diligence searches per PPSA PMSI requirements; discussions with Cassels team regarding diligence searches and next steps; prepare list of secured parties for PMSI notices;	9.70
Oct-23-24	S. Joneja	Review and prepare email correspondence in connection	1.30

Date	Name	Description	Hours
Oct-23-24	M. Clarkson-Maciel	with enquiries regarding PPSA matters relating to consignment agreement; review consignment agreement; Draft Tiger Sale Agreement following additional comments from the team; numerous correspondences with team regarding execution of documents, registration of security;	3.00
Oct-23-24	Im, Anita	Receive and review additional instructions; Attending to ongoing Alberta, British Columbia, Ontario Saskatchewan PPSA searches in respect of VTC Canada Holdings Inc., First Truck Centre Inc., P&R Truck Centre Ltd., Brandt Tractor Ltd., Ryson Equipment Sales ULC, Metro Freightliner Hamilton Inc., and Performance Equipment Ltd; review search results and prepare report with respect to same; email correspondence with working group;	1.40
Oct-23-24	J. Fleisher	Manitoba PMSI / consignment issues / general collateral description review / instructions on notices;	1.10
Oct-23-24	J. Fleisher	Discussion with Saskatchewan lawyer / review of Alberta Act v Saskatchewan Act for procedures US registration matters;	1.30
Oct-23-24	S. Kukulowicz	Review of emails regarding Tiger Agreement; review of emails regarding additional VINs and expanded mandate; telephone attendance with N. Levine regarding various issues;	1.10
Oct-23-24	N. Levine	Calls with client, US counsel, and Cassels team regarding registrations, agreements, orders, sale mechanics; confer with dealers regarding sale issues and next steps; review documents;	3.50
Oct-24-24	E. Hyderman	Discussions with N. Levine, N. Geary, and M. Clarkson-Maciel regarding revisions to the Dealer Agreements; revise Dealers Agreements in accordance with same; distribute revised Dealer Agreements for execution; discussions with Working Group regarding same;	2.80
Oct-24-24	J. Noel	Review diligence searches per PPSA PMSI requirements; discussions with Cassels team regarding diligence searches and next steps; prepare list of secured parties for PMSI notices;	8.50
Oct-24-24	S. Rothery	Attend to PPSA matters; prepare PPSA security interest notices in respect of the Consignment Agreement between the Manager and the Debtors;	11.20
Oct-24-24	T. Li	Meetings and correspondence with working group in respect of draft PPSA registrations; finalize draft PPSA registrations and coordinate submission and review of same with S. Rothery; review draft financing statements prepared by T. Konechny; review of Saskatchewan, Alberta, British Columbia and Manitoba PPSAs in respect of PMSI form and substance requirements; review of supplemental PPSA search results received in respect of dealers' locations in Ontario, Alberta, British Columbia, Manitoba and Saskatchewan; discussions with J. Noel and S. Rothery in respect of certain PPSA result hits; correspondence with J.	12.70

Date	Name	Description	Hours
		Fleisher and C. Potter in respect of Manitoba and Saskatchewan counsel's revisions to internal form of PMSI notice and provide assessment of same; correspondence and discussions with M. Clarkson-Maciel and E. Hyderman in respect of revised dealer agreements and review same; instruct and coordinate collection of signature pages to PMSIs with S. Rothery; correspondence with client and attend to other personal property security matters;	
Oct-24-24	M. Clarkson-Maciel	Tiger Agreement draft; review and comment on documents prepared by team; correspondence with client regarding next steps;	5.40
Oct-24-24	Im, Anita	Attending to ongoing Alberta, British Columbia, Ontario Saskatchewan PPSA searches in respect of VTC Canada Holdings Inc., First Truck Centre Inc., P&R Truck Centre Ltd., Brandt Tractor Ltd., Ryson Equipment Sales ULC, Metro Freightliner Hamilton Inc., and Performance Equipment Ltd; review balance of search results and prepare report with respect to same; email correspondence with working group;	0.40
Oct-24-24	J. Fleisher	Form of PMSI notice and details to be provided and draft of same; various questions during the day and delivery of notice issues;	2.40
Oct-24-24	J. Fleisher	PPSA and PMSI matters regarding Saskatchewan and Manitoba;	0.70
Oct-24-24	N. Geary	Review and comment on Dealer Agreements; discussions with team;	0.80
Oct-24-24	T. Konechny	Attend to draft Alberta, British Columbia, and Ontario PPSA registrations;	0.80
Oct-24-24	J. Fleisher	Matters regarding the requirement to register the consignment in the US;	0.60
Oct-24-24	C. Potter	Matters regarding discharge of liens against trucks and trailers and correspondence regarding the same; call to discuss lien discharge; call with U.S. counsel regarding UCC registrations and related matters; matters regarding Tiger registration and correspondence with U.S. counsel regarding the same;	4.10
Oct-24-24	S. Kukulowicz	Review of various emails and documents regarding PPSA registration and sale transaction; office conference with N. Levine;	0.80
Oct-24-24	N. Levine	Revisions to agreements; calls with Company and Monitor counsel; calls with client; prepare for sales; confer with lending team and US counsel;	3.00
Oct-25-24	J. Noel	Review diligence searches per PPSA PMSI requirements; discussions with Cassels team regarding diligence searches and next steps; prepare list of secured parties for PMSI notices; attend to delivery of PMSI notices; review PPSA post-registration searches;	7.10
Oct-25-24	E. Hyderman	Discussions with Working Group regarding delivery and execution of Metro and Ryson Dealers' Agreements; review	1.50

Date	Name	Description	Hours
Oct-25-24	S. Rothery	discussions regarding revisions to the Tiger Sale Agreement; Attend to PPSA matters; prepare and mail PPSA security interest notices in respect of the Consignment Agreement between the Manager and the Debtors;	9.10
Oct-25-24	T. Li	Review and finalize forms of PMSI notices and collaborate with S. Rothery to replicate same; working group call in respect of PMSI notice matters and discussions with J. Fleisher in respect of receipt and documentation for same; prepare individual PMSI notice packages; review of PPSA registration confirmation statements; liaising with MB and SK counsel in respect of forms of local PMSI notices and registrations and review of same; attend to PMSI delivery and mailing matters; review of registered mail receipts received from MB and SK counsel; instruction and correspondence with S. Atiq in respect of caselaw research regarding PMSI notice, form and delivery matters; review and note-up caselaw flagged by S. Atiq and discuss findings with working group; correspondence with restructuring team in respect of executed Dealer Agreements and motor vehicle particulars; attend to other personal property security matters;	9.20
Oct-25-24	C. Potter	Attend to matters relating to finalization of PMSI notices and related items; matters regarding U.S. registrations and correspondence regarding the same;	1.60
Oct-25-24	M. Clarkson-Maciel	Correspondence with client regarding service and security addresses; numerous correspondence with finance team regarding the same; draft amendments to Tiger Agreement and preparation of execution version;	4.30
Oct-25-24	J. Fleisher	Further issues with PMSI notices and timing of notices and location;	1.30
Oct-25-24	J. Fleisher	Surety bond matters;	0.40
Oct-25-24	T. Konechny	Attend to finalizing Alberta, British Columbia, and Ontario PPSA registrations; conduct post-searches;	0.50
Oct-25-24	S. Kukulowicz	Review of emails regarding revisions CMO and discussed same with N. Levine;	0.60
Oct-25-24	N. Levine	Correspondence regarding PPSA registrations and lien issues; consider outstanding documents; confer with US counsel and lending team; review Tiger Agreement and bond issues; mark up order; correspond with Monitor;	3.10
Oct-26-24	E. Hyderman	Discussions with client regarding delivery of the Ryson Dealer Agreement;	0.30
Oct-26-24	T. Li	Review of verification statements and post-registration searches received to date;	0.50
Oct-26-24	M. Clarkson-Maciel	Draft amendments to U.S. Recognition Order to reflect Collateral Management Order; correspondence with team regarding the same.	1.20
Oct-27-24	M. Clarkson-Maciel	Amendment to Collateral Management Order to reflect additional non-syndicate assets to be collected by manager	1.30

Date	Name	Description	Hours
		for Bank of Nova Scotia, Royal Bank of Canada (both on its own and in its capacity as securitization party);	
Oct-27-24	M. Clarkson-Maciel	Draft amendment and implementing comments from team regarding motion to enforce Wind-Down Orders and amendments to Collateral Management Order;	0.90
Oct-27-24	N. Levine	Revise order; revise US materials; correspondence regarding service list; call with Cassels team;	0.90
Oct-27-24	S. Kukulowicz	Review of updated collateral lists; review of draft US motion to recognize the Wind-Down Orders; telephone attendance with N. Levine regarding draft amended CMO;	0.80
Oct-28-24	E. Hyderman	Discussions with working group and client regarding execution status of Dealer Agreements; draft request for electronic service; update exhibit to Tiger Sale Agreement; draft template repair shop receipt acknowledging payment in exchange for release of vehicles;	3.20
Oct-28-24	S. Rothery	Attend to PPSA matters; instruct P. Mabanza to track delivery confirmations for PPSA security interest notices sent in respect of the Consignment Agreement between the Manager and the Debtors;	2.20
Oct-28-24	T. Li	Review of post-registration searches; review and comment on draft California UCC registration and liaise with U.S. counsel regarding same; correspondence and meetings with J. Noel and S. Rothery in respect of PMSI workstream and outstanding PPSA matters;	1.70
Oct-28-24	J. Noel	Review Ontario PPSA post-registration searches; attend to courier of PMSI notices;	0.70
Oct-28-24	M. Clarkson-Maciel	Draft amended order and US Recognition Order to reflect receipt of additional management property; correspondence on workstreams; conference with N. Levine regarding workstreams; draft notices of designation / amendment for designation of additional VINs; review of drafts prepared by team regarding receipts;	4.00
Oct-28-24	P. Mabanza	Update progress of PMSI notice delivery at the instruction of S. Rothery; compile verifications regarding the same;	3.80
Oct-28-24	C. Potter	Matters regarding registrations and related matters; correspondence regarding the same;	0.30
Oct-28-24	N. Geary	Review and comment on draft notices regarding additional vehicles;	0.70
Oct-28-24	T. Konechny	Receive and transmit Ontario PPSA post-searches and Verification Statements;	0.20
Oct-28-24	N. Levine	Revise order; discuss same with syndicate lender counsel; prepare for hearing; review Monitors reports for context of dispute; discuss lease book issues with client; comment on draft implementation documents;	3.50
Oct-28-24	S. Kukulowicz	Review of emails regarding amendment of CMO and expansion of mandate; telephone attendance with N. Levine regarding difficulties in implementing Wind-Down Order;	1.10

Date	Name	Description	Hours
Oct-29-24	S. Rothery	Attend to PPSA matters; instruct P. Mabanza to track delivery confirmations for PPSA security interest notices sent in respect of the Consignment Agreement between the Manager and the Debtors; review outstanding PPSA security interest notice deliveries with T. Li and P. Mabanza;	2.90
Oct-29-24	T. Li	Review of motion materials (including existing syndicate Collateral Management Order and Vesting Order); attend to PMSI notice and PPSA-related matters; review of post-registration searches; correspondence with Saskatchewan and Manitoba counsel in respect of PMSI notices and PPSA matters;	3.70
Oct-29-24	P. Mabanza	Update progress of PMSI notice delivery at the instruction of S. Rothery; compile verifications regarding the same;	5.40
Oct-29-24	M. Clarkson-Maciel	Various correspondence with client regarding collateral management order, sale tax;	0.80
Oct-29-24	C. Potter	Review of repairers lien release and comment regarding the same; call with N. Levine regarding language in the U.S. order and preparation of language with respect to the same;	0.60
Oct-29-24	N. Levine	Address US order issues; calls with additional lenders and Company; calls with client regarding agreements and outstanding issues; confer with client and Monitor regarding updates to order and schedules; calls with US counsel;	4.20
Oct-29-24	S. Kukulowicz	Review of proposed revisions to CMO and related emails; review of emails regarding US recognition orders;	1.20
Oct-30-24	E. Hyderman	Correspondence with working team regarding distribution and execution of the Tiger Agreement; correspondence with working group regarding motion to enforce Wind-Down Orders;	0.50
Oct-30-24	S. Rothery	Attend to PPSA matters; review outstanding PPSA security interest notice deliveries with T. Li and C. Potter;	1.50
Oct-30-24	T. Li	Review of motion materials (including existing syndicate Collateral Management Order and Vesting Order); attend to PMSI notice and PPSA-related matters; review of post-registration searches;	1.90
Oct-30-24	J. Noel	Discuss PPSA post-registration matters with T. Li;	0.60
Oct-30-24	M. Clarkson-Maciel	Conference with client regarding requests to the Monitor of outstanding information and documentation necessary for Manager's role; follow-ups regarding the same; various correspondence on documentary signing; review of U.S. Recognition Order;	2.00
Oct-30-24	P. Mabanza	Update progress of PMSI notice delivery at the instruction of S. Rothery; compile verifications regarding the same;	3.80
Oct-30-24	N. Levine	Review client draft materials; call with client regarding history; calls regarding amendment to order; consider changes to same;	3.20
Oct-30-24	C. Potter	Matters regarding proposed U.S. court order and review	1.30

Date	Name	Description	Hours
		and consider wording with respect to the same; matters regarding delivery of PMSI notices with respect to consignment Dealers and correspondence regarding the same;	
Oct-30-24	S. Kukulowicz	Review of emails and revised documents; office conference with N. Levine.	0.60
Oct-31-24	E. Hyderman	Discussions with working group regarding revisions to the repair shop receipt agreement; revise repair shop receipt agreement; proof-reading, suggesting revisions, and cross-referencing the draft Letter to the Monitor from the Manager; discussions with M. Clarkson-Maciel regarding same;	4.20
Oct-31-24	S. Rothery	Attend to PPSA matters; review outstanding PPSA security interest notice deliveries with T. Li and P. Mabanza;	0.90
Oct-31-24	C. Potter	Review of revised RSLA release and correspondence regarding the same; correspondence regarding PPSA registration matters relating to additional VINs from secured creditors under existing Dealer Agreements;	0.70
Oct-31-24	T. Li	Review correspondence and consider implications of amendment to syndicate Collateral Management Order;	0.20
Oct-31-24	M. Clarkson-Maciel	Review drafts of repair shop receipts; numerous correspondence with U.S. counsel for the syndicate and Canadian counsel for the syndicate regarding the U.S. Recognition Order; analysis of summaries prepared by manager regarding Monitor requests; draft letter to Monitor regarding requests from court-appointed Manager; consideration of the same; conference with team regarding legal risks;	7.50
Oct-31-24	P. Mabanza	Update progress of PMSI notice delivery at the instruction of S. Rothery; compile verifications regarding the same;	1.30
Oct-31-24	S. Kukulowicz	Review of emails regarding amendment to CMO; telephone attendance with N. Levine regarding various issues.	0.90
Oct-31-24	J. Fleisher	Question regarding other assets with dealers;	0.30
Oct-31-24	N. Geary	Review of proposed amendment to Collateral Management Order;	0.30
Oct-31-24	N. Levine	Prepare for court; revise order; comment on motion materials; discussions with client and Cassels team regarding same; calls with lenders and discuss variations of order needed for lenders; address pick up issues and documentation; discuss revised US materials for same;	3.80

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Clarkson-Maciel, Matteo	Business Advisor	107.80	700.00	75,460.00
Li Parizeau, Tera	Partner	3.30	825.00	2,722.50

Name	Title	Hours	Rate	Amount
Potter, Carla	Partner	18.30	795.00	14,548.50
Joneja, Sunil	Partner	3.50	815.00	2,852.50
Solhi, Bobby B.	Partner	4.90	950.00	4,655.00
Fleisher, Jonathan	Partner	12.00	1,130.00	13,560.00
Kukulowicz, Shayne	Partner	33.00	1,650.00	54,450.00
Geary, Nicola	Partner	7.90	925.00	7,307.50
Levine, Natalie	Partner	64.20	1,000.00	64,200.00
Noel, J'Davia	Associate	39.20	450.00	17,640.00
Hyderman, Eva	Associate	21.60	450.00	9,720.00
Rothery, Shae	Associate	39.20	450.00	17,640.00
Li, Timon	Associate	66.50	485.00	32,252.50
Urquhart, Braek	Associate	6.50	715.00	4,647.50
Im, Anita	Law Clerk / Paralegal	4.20	350.00	1,470.00
Konechny, Tiffany	Law Clerk / Paralegal	1.50	410.00	615.00
Mabanza, Pasha	Law Student	14.30	295.00	4,218.50
Total (CAD)		447.90		327,959.50

Our Fees	327,959.50	
HST @ 13.00%	42,634.74	
TOTAL FEES & TAXES (CAD)		370,594.24

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

Delivery - External	428.80
PPSA - Registration/Applic./Discharges	214.00
Electronic Due Diligence	214.50
BC Online - PPSA Search/Registrations	42.50
Govt of Alberta Pers Prop Regi	9.00
Total Non-Taxable Disbursements	908.80

Taxable Disbursements

Electronic Due Diligence	402.00
Delivery	1,687.01
PPSA - Registration/Applic./Discharges	724.00
West Law - Online Searches	88.00
Total Taxable Disbursements	2,901.01
HST @ 13.00%	377.13

Cassels Brock & Blackwell LLP
Alvarez
Re: Court-appointment as Manager of certain assets of the Pride
Group

Page 17 of 17
Invoice No: 2260158
Matter No. 059366-00005

Total Taxable Disbursements & Taxes	3,278.14
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TOTAL DISBURSEMENTS & TAXES (CAD)	4,186.94
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TOTAL FEES	327,959.50
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TOTAL DISBURSEMENTS	3,809.81
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TOTAL TAXES	43,011.87
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TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	374,781.18
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OUTSTANDING INVOICES				
Invoice Number	Invoice Date	Bill Amount	Payments / Credits	Balance Due
2258959	11/20/24	80,999.29	0.00	80,999.29
2260158	11/28/24	374,781.18	0.00	374,781.18
Total (CAD)		455,780.47	0.00	455,780.47



Attn: Douglas McIntosh
Alvarez
Royal Bank Plaza, South Tower
200 Bay Street, Suite 2900, P.O. Box 22
Toronto, ON M5J 2J1

Invoice No: 2263273
Date: December 20, 2024
Matter No.: 059366-00005
GST/HST No.: R121379572

Lawyer: Kukulowicz, Shayne
Tel.: (416) 860-6463
E-mail: SKukulowicz@cassels.com

Re: Court-appointment as Manager of certain assets of the Pride Group

Fees for professional services rendered up to and including November 30, 2024

Our Fees	290,296.50
Disbursements	11,163.13
Total Fees and Disbursements	301,459.63
HST @ 13.00%	39,017.90
TOTAL DUE (CAD)	340,477.53

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Transit No.: 47696
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Swift Code: NOSCCATT
ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

Online Bill Payments:

Vendor name is **Cassels Brock Blackwell LLP** and
you are required to enter the first six digits of the
matter #

Invoice No: 2263273
Matter No.: 059366-00005

Amount: **CAD 340,477.53**

e-Transfer Payments: payments@cassels.com

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Cassels Brock Blackwell LLP | cassels.com

Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL			
Date	Name	Description	Hours
Nov-01-24	E. Hyderman	Discussions with N. Levine and M. Clarkson-Maciel regarding motion to amend the Syndicate Collateral Management Order; continuing to cross-reference draft Letter to the Monitor from the Manager;	0.90
Nov-01-24	S. Rothery	Attend to PPSA matters; review outstanding PPSA security interest notice deliveries;	0.20
Nov-01-24	T. Li	Discussion and correspondence with S. Rothery and articling student in respect of PMSI and PPSA notice matters;	0.30
Nov-01-24	M. Clarkson-Maciel	Draft correspondence to Monitor regarding requests; correspondence with U.S. counsel regarding notices; conference with team regarding hearings;	4.30
Nov-01-24	M. Clarkson-Maciel	Draft letter to Monitor; comments on the same;	1.80
Nov-01-24	B. Solhi	Review of email correspondence and draft agreements including court order for same; Notes to file and draft for discussions;	0.80
Nov-01-24	P. Mabanza	Update progress of PMSI notice delivery at the instruction of S. Rothery; Compile verifications regarding the same;	1.00
Nov-01-24	S. Kukulowicz	Review of motion record to expand CMO; Zoom conference with N. Levine regarding 9:30 hearing and status of amended CMO; review of A&M information requests; review of court endorsement; review of draft correspondence to Monitor and Pride Entities;	1.90
Nov-01-24	C. Potter	Matters regarding wording of order and related items; correspondence regarding the same;	0.30
Nov-01-24	N. Levine	Prepare for court; confer with RBC Bilat counsel; confer with client regarding schedules; finalize same; work on draft letter; confer with client regarding pick up concerns;	4.50
Nov-02-24	M. Clarkson-Maciel	Amend draft letter following internal comments;	0.60
Nov-02-24	S. Kukulowicz	Reviewed and revised letter requesting information from the Pride Entities and Monitor; review of correspondence from TGF regarding Casitron software;	1.10
Nov-02-24	N. Levine	Review search results; consider next steps on revisions to materials; discuss same with Cassels team;	0.20
Nov-03-24	M. Clarkson-Maciel	Conference with team regarding letter; drafting; correspondence with client;	2.10
Nov-03-24	S. Kukulowicz	Review of draft letter to the Pride Group et al. regarding various requests; teams conference and emails regarding revisions to draft letter;	1.80
Nov-03-24	N. Levine	Consider additional correspondence; revise letter; discussion with Cassels team regarding same;	0.80
Nov-04-24	E. Hyderman	Update N. Levine, M. Clarkson-Maciel, and client regarding the execution status of the Tiger Sale Agreement; discussions with N. Levine regarding draft of the Tiger repair shop release;	0.50
Nov-04-24	S. Rothery	Attend to PPSA matters; review outstanding PPSA security	4.70

Date	Name	Description	Hours
		interest notice deliveries; research [REDACTED] [REDACTED] [REDACTED] and summarize findings; consult with J. Fleisher, C. Potter, and T. Li regarding [REDACTED] [REDACTED];	
Nov-04-24	M. Clarkson-Maciel	Various correspondence regarding amended syndicate CMO; correspondence regarding sales tax; conference with team regarding letters to monitor; draft letters;	6.00
Nov-04-24	F. Ebadi	Receive and review instructions; attend to security searches with respect to VIN registration; email correspondence with working group;	0.30
Nov-04-24	B. Solhi	Internal correspondence and tax strategy pertaining to sales tax matters; preparation and attendance at conference call with various parties including Blakes, A&M regarding tax provisions; further review of Excise Tax Act and related provisions;	1.90
Nov-04-24	T. Li	Statutory and caselaw research in respect of Ontario Repair and Storage Liens Act and equivalent legislation in Alberta and British Columbia; discussions with S. Rothery regarding same and review of research findings; meeting with C. Potter to discuss conflicts of laws issues and consider further research avenues and implications of information received to date; attend to PMSI and PPSA matters;	3.40
Nov-04-24	S. Kukulowicz	Review of 11th Report of the Monitor regarding security review and issue of VIN searches; various discussions with N. Levine; review of updated CMO schedule; review of details regarding Leasebooks transition;	2.80
Nov-04-24	K. Norman	Receive and review instructions; attend to MTO searches; obtain copies of MTO documents; review search results and prepare report with respect to same; email correspondence with C. Potter;	0.50
Nov-04-24	J. Fleisher	RSLA matters and legal jurisdiction; ownership matters;	1.30
Nov-04-24	C. Potter	Matters regarding title to vehicles and searches with respect to the same; matters regarding repair and storage liens and correspondence regarding the same;	1.50
Nov-04-24	N. Levine	Review Monitor's reports; assist client with legal issues related to various pick ups; discuss lien issues with Cassels team and develop strategy for addressing same; confer with Cassels team and client regarding correspondence to Monitor; correspond with Monitor; work on recognition issues;	5.50
Nov-04-24	B. Urquhart	Review file; prepare for and attend call with client and counterparty accounting and legal advisors;	1.50
Nov-05-24	E. Hyderman	Revise November 5, 2034 draft letter to the Monitor	0.30

Date	Name	Description	Hours
		regarding Lease Transitions; correspondence with M. Clarkson-Maciel regarding same;	
Nov-05-24	J. Noel	Discussions with Cassels team regarding order to discharge existing liens and lien release protocol;	1.00
Nov-05-24	M. Clarkson-Maciel	Conference with A&M regarding letter to Pride entities; draft and conference regarding the same; draft additional letters to Pride entities; consideration and analysis of documents;	7.30
Nov-05-24	S. Rothery	Attend to PPSA matters; review outstanding PPSA security interest notice deliveries; consult with J. Fleisher, C. Potter, T. Li, and J. Noel regarding the Repair and Storage Liens Act (Ontario), the Repairers Lien Act (British Columbia), and the Garage Keepers' Lien Act (Alberta); Summarize Ontario PPSA registrations against VIN 527SR5325MM022382;	2.30
Nov-05-24	F. Ebadi	Receive and review search results and prepare report with respect to same; email correspondence with working group;	0.20
Nov-05-24	S. Kukulowicz	Reviewed and revised draft letter regarding transition of leases; teams conference with A&M regarding draft letter and other issues; review of emails regarding Dixie Parts auction; finalized lease transition letter; discussions with N. Levine and review of emails regarding RSLA claims; review of draft follow-up letter regarding lease issues;	4.30
Nov-05-24	J. Fleisher	Calls regarding liens and proper title; ability to sell free and clear and RSLA impact and suggestions;	2.60
Nov-05-24	C. Potter	Matters regarding delivery of PPSA notices and correspondence regarding the same; matters regarding RSLA filings and place to file and correspondence regarding the same; call with A&M and US counsel to discuss filings and related matters; discussions regarding discharge of liens and title issues;	3.90
Nov-05-24	N. Levine	Meet with client regarding correspondence; revise same; revise additional correspondence; consider next steps; prepare for hearing; review release documents; address client questions; calls with Monitor regarding RSLA liens;	5.00
Nov-05-24	T. Li	Statutory and caselaw research in respect of Ontario Repair and Storage Liens Act and equivalent legislation in Alberta and British Columbia; discussions with S. Rothery regarding same and review of research findings; discussion with J. Fleisher in respect of lien super-priorities and review of PPSA analysis to date; attend to PMSI and PPSA matters with S. Rothery and articling student;	5.90
Nov-06-24	E. Hyderman	Proofreading November 6, 2024 letter to counsel to the Monitor;	0.40
Nov-06-24	M. Clarkson-Maciel	Letters to be sent to Monitor and Pride Entities;	4.30
Nov-06-24	S. Rothery	Attend to PPSA matters; review outstanding PPSA security interest notice deliveries;	0.10
Nov-06-24	T. Li	Call with N. Levine in respect of RSLA liens and proposed draft letter to Monitor; review of RSLA research and	1.20

Date	Name	Description	Hours
		consider implications of same in respect of certain motor vehicle and other lien search results;	
Nov-06-24	J. Fleisher	Review of lien protocol letter;	0.70
Nov-06-24	S. Kukulowicz	Review of draft letter to Pride Entities and Monitor regarding outstanding deliverables and lack of cooperation; review of comments from A&M and syndicate;	1.30
Nov-06-24	N. Levine	Work on amendments to letters; consider lien issues; confer with lenders and client regarding missing property; consider updates from Pride;	1.90
Nov-07-24	E. Hyderman	Review court materials in Monitor document centre to identify the DIP Facility Amendment; correspondence with M. Clarkson-Maciel regarding same;	0.90
Nov-07-24	T. Li	Call with S. Rothery in respect of PMSI notice matters and review of same;	0.40
Nov-07-24	M. Clarkson-Maciel	Conference with counsel to the syndicate and client regarding correspondence to Monitor; draft on the same; call with client regarding drafts;	7.70
Nov-07-24	S. Rothery	Attend to PPSA matters; review outstanding PPSA security interest notice deliveries; consult with T. Li and P. Mabanza regarding outstanding PPSA security interest notice deliveries;	0.40
Nov-07-24	J. Fleisher	E-mails regarding discharge;	0.40
Nov-07-24	S. Kukulowicz	Participated in conference call with A&M, Faskens and Syndicate regarding letter to Pride Entities and the Monitor; reviewed and provided final comment on draft letter; review of other comments and emails; review of Applicants' motion record for amendments to Wind-Down Order, real estate sale approvals and other relief;	2.30
Nov-07-24	C. Potter	Matters with respect to initial discharge against VIN disposed of; correspondence regarding the same;	0.30
Nov-07-24	N. Levine	Revisions to letters to Pride; discuss lien issues with client; review motion materials; calls with lender counsel; consider strategy with Cassels team; review sale documents; calls with client;	6.20
Nov-08-24	T. Li	Review of amended CMO, turn-over order and lien release order; call with lending working group in respect of lien release matters and prepare first draft of lien release protocol for further consideration by C. Potter and N. Levine; attend to PMSI matters;	3.50
Nov-08-24	J. Noel	Discussions with Cassels team regarding lien release protocol; review court orders regarding authorization to discharge liens;	1.40
Nov-08-24	M. Clarkson-Maciel	Conference with team regarding letter on lease transitions; call with client regarding the same; draft on the same; meeting with Counsel to Syndicate Lenders of Pride regarding next steps and lease transitions; draft and prepare analysis on correspondence between A&M and monitor regarding lease transitions;	6.90

Date	Name	Description	Hours
Nov-08-24	S. Rothery	Attend to PPSA matters; review outstanding PPSA security interest notice deliveries; consult with C. Potter, T. Li, and J. Noel regarding discharging encumbrances on motor vehicles;	1.30
Nov-08-24	J. Fleisher	Discharge matters and reliance matters on Monitors work;	0.60
Nov-08-24	S. Kukulowicz	Revised draft letter to Pride Entities and Monitor; review of emails regarding lease transition issues; teams conference with A&M; review of Monitor's 17th Report; review of record of emails/notes; revised draft letter regarding turn-over issues and discussed same with M. Clarkson-Maciel and N. Levine;	4.80
Nov-08-24	C. Potter	Matters regarding PPSA discharge protocol; discuss protocol and review prospective registration release; correspondence regarding the same;	0.70
Nov-08-24	N. Levine	Revise correspondence; work on lease issues; address lien release queries; prepare for hearing; review motion record and discuss with client; discuss truck pick up issues with client; address contract issues; confer with lender counsel;	3.40
Nov-09-24	M. Clarkson-Maciel	Conference with team regarding letters; amendments to the same;	1.70
Nov-09-24	S. Kukulowicz	Review of various comments on draft letter to Pride Entities and Monitor; conference call with A&M to further revise letter; further revised letter and exchanged related emails;	2.60
Nov-09-24	N. Levine	Revise correspondence; review Monitor's report;	1.00
Nov-10-24	S. Kukulowicz	Review of response from counsel for the Pride Entities regarding lease transitions; telephone attendance with N. Levine;	0.40
Nov-11-24	E. Hyderman	Begin draft Notice of Motion to amend Turn-Over Order; correspondence with N. Levine regarding same; review motion record of motion to lift stay;	3.00
Nov-11-24	M. Clarkson-Maciel	Call with counsel to syndicate lenders, Monitor, and Pride regarding lease transition payments; follow-up on the same; various correspondence regarding file; review notice of motion for lift stay by Mitsubishi;	2.80
Nov-11-24	S. Kukulowicz	Telephone attendance with D. McIntosh regarding strategy to deal with lease transitions; exchanged messages with K. Bourassa; teams conference with EY, A&M, TGF, Faskens and Blakes regarding lease issues; follow-up discussions and emails;	2.80
Nov-11-24	N. Levine	Call with client regarding lease issues; revise NOM; prepare for hearing; review correspondence with Pride; review motion record; correspond with client regarding pick up; correspond with RBC regarding same; review updates on outstanding vehicles and searches regarding same;	1.50
Nov-12-24	E. Hyderman	Review precedent demand letters; correspondence with N. Levine regarding same; review draft letter to repairers; correspondence with M. Clarkson-Maciel regarding same;	0.60
Nov-12-24	J. Noel	Discuss lien release protocol with T. Li;	0.20

Date	Name	Description	Hours
Nov-12-24	T. Li	Review of RSLA research pertaining to Ontario, British Columbia and Alberta and discussions and correspondence with working group regarding same; review and revise lien release protocol in light of comments and queries received from N. Levine; prepare draft omnibus direction to between Manager and Cassels in respect of lien releases; send draft of same to C. Potter and J. Fleisher for further review and comment; review of lien searches with S. Rothery;	5.90
Nov-12-24	S. Rothery	Attend to PPSA matters; review outstanding PPSA security interest notice deliveries; review court orders for language authorizing A&M to discharge liens and encumbrances to be included in omnibus direction;	3.40
Nov-12-24	M. Clarkson-Maciel	Draft demand letter to repairers; call with N. Levine regarding next steps and workstreams; meeting with client regarding the same; review filed documents;	4.00
Nov-12-24	S. Kukulowicz	Review of Mitsubishi motion record to lift stay; exchanged emails regarding Daimler issue with lease transitions; telephone attendance with N. Levine regarding outstanding issues; review of demand for possession letter; review of proposed response to Pride Entities; review of Monitors supplemental report;	2.70
Nov-12-24	J. Fleisher	Review of discharge protocol;	0.40
Nov-12-24	C. Potter	Matters regarding discharge of security protocol and related matters; correspondence regarding the same;	0.60
Nov-12-24	N. Levine	Confer with US counsel and client regarding various pick up issues; comment on lien release process; prepare responses to company counsel; draft additional documents and demands; confer with lender counsel;	3.00
Nov-13-24	J. Noel	Discussions with T. Li and S. Rothery regarding lien release next steps;	0.50
Nov-13-24	M. Clarkson-Maciel	Hearing regarding motion approving orders and amending wind-down order; draft letter to truck towing companies; various correspondence;	1.40
Nov-13-24	S. Rothery	Attend to PPSA matters; discussion with T. Li regarding draft omnibus direction with respect to the discharge of liens and encumbrances; review and organize delivery confirmations for PPSA notices within document management system;	1.00
Nov-13-24	S. Kukulowicz	Review of supplemental report of EY; office conference with N. Levine and review of emails regarding hearing; attended hearing; review of lift stay motion by National Bank for appointment of receiver over certain properties; review of endorsement from hearing;	2.20
Nov-13-24	J. Fleisher	Call regarding protocol with C. Potter;	0.40
Nov-13-24	C. Potter	Matters regarding PPSA priority and related matters; correspondence regarding the same;	1.10
Nov-13-24	N. Levine	Address title issues; prepare for hearing; participate in hearing; correspond with client regarding lease issues and pick up issues; prepare documents for client; confer with US	4.70

Date	Name	Description	Hours
Nov-14-24	E. Hyderman	counsel; Review correspondence between client and working group regarding the US demand letters; correspondence with N. Levine and M. Clarkson-Maciel regarding same;	0.10
Nov-14-24	J. Noel	Discussions with Cassels team regarding lien release diligence;	0.30
Nov-14-24	T. Li	Correspondence with working group in respect of motor vehicle lien releases in British Columbia and related disposition matters; correspondence with and coordinate clerks in retrieving motor vehicle registry searches in British Columbia and consider implications of same; review of PMSI delivery documentation and summary prepared by S. Rothery and articling student; attend to other personal property security matters;	1.80
Nov-14-24	M. Clarkson-Maciel	Draft demand letter for US assets; correspondence with US legal counsel regarding the same; various correspondence with client regarding outstanding letters; tend to matter;	2.10
Nov-14-24	S. Rothery	Attend to PPSA matters; review correspondence in respect of VIN searches at the British Columbia Ministry of Transportation; review and organize delivery confirmations for PPSA notices within document management system; create index of PPSA notices in document management system;	2.50
Nov-14-24	J. Fleisher	Review of lien letters and correspondence;	0.40
Nov-14-24	S. Kukulowicz	Review of draft lien letter and discussed same with N. Levine; review of various updates regarding Management Property and transition;	1.20
Nov-14-24	K. Norman	Receive and review instructions; attend to ICBC and security searches; receipt and review of the same; Prepare report; email correspondence with T. Li;	0.60
Nov-14-24	N. Levine	Revise correspondence; review motion record; address tax issues; confer with client regarding agreements; confer with counsel to lenders regarding lease extension issues;	2.70
Nov-15-24	N. Geary	Review and comment on draft remarketing agreement;	1.40
Nov-15-24	E. Hyderman	Review factum filed in respect of November 18, 2024 hearing;	0.30
Nov-15-24	S. Kukulowicz	Review of National Bank factum in support of receivership; review of emails regarding insurance issues;	0.80
Nov-15-24	K. Norman	Correspondence with ICBC;	0.10
Nov-15-24	J. Fleisher	Matters regarding selling of trucks and past practices and registration rules;	0.60
Nov-15-24	N. Levine	Review contract; consider next steps; call with Pride counsel regarding titling issues; discuss same with client and consider insurance issues;	1.20
Nov-16-24	N. Levine	Review responding record;	0.10
Nov-17-24	E. Hyderman	Review Eighteenth report of the Monitor;	0.20
Nov-17-24	S. Kukulowicz	Review of responding motion record of Pride regarding	1.10

Date	Name	Description	Hours
		National Bank receivership motion; review of Monitor's 18th Report;	
Nov-17-24	N. Levine	Review Monitor's report and responding record;	0.50
Nov-18-24	E. Hyderman	Revise OL Remarketing agreement per N. Geary and M. Clarkson-Maciel comment; correspondence with M. Clarkson-Maciel regarding same;	1.30
Nov-18-24	S. Rothery	Attend to PPSA matters; consult with T. Li regarding VIN searches at the British Columbia Ministry of Transportation; correspond with N. Levine, C. Potter, and J. Fleisher regarding VIN searches at the British Columbia Ministry of Transportation;	0.60
Nov-18-24	T. Li	Prepare draft omnibus direction in respect of lien discharges; review and revise lien release protocol; discussion and correspondence with working group members regarding PPSA and motor vehicle lien searches; attend to other personal property security matters;	2.20
Nov-18-24	J. Noel	Discussions with Cassels team regarding BC MTO searches;	0.20
Nov-18-24	M. Clarkson-Maciel	Hearing regarding appointment of receiver over properties; draft personal vehicle dealer agreement; correspondence on the same; supervising juniors on draft;	5.80
Nov-18-24	B. Solhi	Review of notes pertaining to GST/HST/PST matters and receivership issue; attendance at conference call with various parties pertaining to tax updates;	0.70
Nov-18-24	B. Urquhart	Prepare for and attend call regarding GST/HST compliance matters;	0.60
Nov-18-24	N. Geary	Review and comment on remarketing agreement;	0.70
Nov-18-24	K. Norman	Receive and review additional instructions; email correspondence with T. Li and ICBC;	0.40
Nov-18-24	J. Fleisher	Ownership issues in BC;	0.50
Nov-18-24	S. Kukulowicz	Office conference with N. Levine regarding hearing for the appointment of receiver at the request of National Bank; review of court endorsement refusing to appoint the receiver;	0.80
Nov-18-24	N. Levine	Prepare for and attend at court; discuss mark up of agreement; call to Pride counsel regarding title issues; revise agreement; review endorsement; calls with client regarding titles; correspondence regarding same; work on tax issues;	4.10
Nov-19-24	J. Noel	Discussions with T. Li regarding lien release protocol;	0.10
Nov-19-24	E. Hyderman	Review revised Openlane Remarketing agreement; correspondence with M. Clarkson-Maciel regarding same; revise letter to repairers per client instruction; correspondence with N. Levine regarding same;	1.20
Nov-19-24	T. Li	Call with C. Potter and S. Rothery in respect of lien discharges, RSLA matters and potential third party interests in collateral; revise omnibus direction to discharge; correspond with N. Levine in respect of lien release	2.80

Date	Name	Description	Hours
Nov-19-24	S. Rothery	protocol; forward omnibus direction to J. Trinh for further review and comment and revise draft accordingly; review of power of attorney and revised form from S. Rothery; Attend to PPSA matters; discussion with T. Li and C. Potter regarding draft omnibus direction with respect to the discharge of liens and encumbrances; review draft omnibus direction with respect to the discharge of liens and encumbrances; discussion with J. Fleisher regarding motor vehicle power of attorney;	3.20
Nov-19-24	M. Clarkson-Maciel	Mark-up of openlane remarketing services agreement; conference with team regarding the same; review demand letter prepared by team; numerous correspondence regarding US Demand letter, vehicle auction, commercial liens;	5.10
Nov-19-24	N. Geary	Revise draft remarketing agreement;	0.60
Nov-19-24	J. Fleisher	Power of attorney matters;	0.80
Nov-19-24	S. Kukulowicz	Review of emails regarding additional VINs; review of list of outstanding items;	0.70
Nov-19-24	C. Potter	Matters regarding lien release protocol and discussion regarding the same; matters regarding power of attorney for titling matters and correspondence regarding the same;	1.50
Nov-19-24	J. Trinh	Review form of omnibus authorization to discharge and provide comments with respect to same;	0.30
Nov-19-24	N. Levine	Work on agreement; calls with client; confer with Cassels team regarding POA; confer with client regarding same; review and comment on outstanding issues list;	2.10
Nov-20-24	J. Noel	Discussions with Cassels team regarding lien release protocol; review PPSA VIN searches;	1.10
Nov-20-24	E. Hyderman	Prepare for, attend and taking notes during call with Clients, S. Kukulowicz, N. Levine, and M. Clarkson-Maciel regarding outstanding issues; review and revise notes;	1.50
Nov-20-24	T. Li	Review of power of attorney and provide comments to same; discussion with working group in respect of power of attorney and sale matters; call with Manager in respect of lien discharges; review and revise draft direction to be provided by Manager to Cassels regarding same; coordinate PPSA searches with clerks, J. Noel and S. Rothery in respect of first Ryson offer; review PPSA search results; review and revise draft of lien discharge protocol; review sale agreement and conduct additional research in respect of RSLA liens;	7.50
Nov-20-24	M. Clarkson-Maciel	Correspondence; us demand letter; call with client regarding open items; correspondence with Pride regarding outstanding vehicles;	2.20
Nov-20-24	S. Rothery	Attend to PPSA matters; discussion with N. Levine, C. Potter, and T. Li regarding draft omnibus direction with respect to the discharge of liens and encumbrances; discussion with N. Levine, C. Potter, and T. Li regarding	2.70

Date	Name	Description	Hours
		motor vehicle power of attorney; discussion with T. Li and J. Noel regarding process for discharging PPSA registrations on motor vehicles; review outstanding PPSA security interest notice deliveries; review BC PPSA search results in respect of vehicles pending sale by Ryson;	
Nov-20-24	J. Fleisher	Discharge matters; power of attorney; related matters;	0.90
Nov-20-24	T. Konechny	Attend to conducting British Columbia and Ontario PPSA VIN searches;	0.40
Nov-20-24	C. Potter	Matters regarding security registrations and correspondence regarding the same; matters relating to tiling and related matters; call with A&M regarding the same;	1.90
Nov-20-24	J. Trinh	Discussion with T. Li with respect to structuring of PPSA searches and PPSA partial discharge procedures;	0.40
Nov-20-24	S. Kukulowicz	Zoom conference with A&M regarding "open items"; review of emails regarding collection of VINs;	1.30
Nov-20-24	N. Levine	Call with client regarding open issues; call with client regarding liens; internal discussion regarding liens; prepare for meeting; draft email to Pride and Monitor; review MCV issues and agreement; work on POA issues and titling issues; draft email regarding liens;	4.50
Nov-21-24	J. Noel	Call with T. Li and S. Rothery regarding lien release diligence and next steps; review PPSA VIN searches;	0.60
Nov-21-24	E. Hyderman	Review Order regarding Sale of Dixie Truck Parts Inc Inventory;	0.10
Nov-21-24	T. Li	Correspondence with working group and client in respect of impending sale of trailers by Ryson; review of titling issues and discussion with J. Fleisher in respect of same; review of VIN searches received in respect of initial batch of vehicles and search summary prepared by S. Rothery; call with client in respect of same; prepare and finalize draft direction and forms of sale notice for further review by N. Levine and C. Potter; correspond and coordinate with counsel to Royal Bank of Canada in respect of PPSA lien discharges;	4.40
Nov-21-24	M. Clarkson-Maciel	Draft openlane agreement; correspondence with CCAA company regarding power of attorney; draft US demand letter; review court docket;	3.50
Nov-21-24	S. Rothery	Attend to PPSA matters; review ON PPSA search results in respect of vehicles pending sale by Ryson; draft summary of liens to be discharged in respect of vehicles pending sale by Ryson; discussion with T. Li regarding process for discharging PPSA registrations on motor vehicles; create internal tracking sheet for liens to be discharged in respect of Pride Group assets;	2.90
Nov-21-24	T. Konechny	Receive and transmit Ontario PPSA VIN searches; attend to conducting further Ontario VIN PPSA searches;	0.60
Nov-21-24	J. Fleisher	Discussion regarding Faskens;	0.40
Nov-21-24	C. Potter	Matters regarding PPSA registrations and discharge	0.40

Date	Name	Description	Hours
Nov-21-24	S. Kukulowicz	matters; correspondence with Faskens regarding the same; Review of emails regarding proceeds of sales; review of form of Remarketing Services Agreement; review of materials filed in support of Dixie Parts sale; review of Monitor's variance report;	1.20
Nov-21-24	N. Levine	Correspondence regarding liens and discharges; confer with US counsel regarding agreement; follow up with client regarding POA; comment on MCV agreement;	1.10
Nov-22-24	J. Noel	Discussions with T. Li and S. Rothery regarding lien release protocol and PPSA searches; review PPSA searches; call with T. Li, S. Rothery and C. Fernandez regarding lien release diligence;	0.60
Nov-22-24	T. Li	Correspondence with working group and client in respect of impending Ryson sale and review of sale documentation received therewith; coordinate due diligence searches with S. Rothery and T. Konechny; review of same and discussions with J. Fleisher in respect of lien releases; review and correspond with P. Mabanza and S. Rothery in respect of PMSI notices; attend to other lien release and PMSI matters;	3.60
Nov-22-24	M. Clarkson-Maciel	Attended hearing regarding Dixie parts; numerous correspondence; conference with team regarding next steps; call with client regarding openlane dealer agreement;	3.30
Nov-22-24	S. Rothery	Attend to PPSA matters; review ON PPSA search results in respect of vehicles pending sale by Ryson; draft summary of liens to be discharged in respect of vehicles pending sale by Ryson; review outstanding PPSA security interest notice deliveries;	3.30
Nov-22-24	N. Geary	Call with client to discuss remarketing agreement;	0.50
Nov-22-24	T. Konechny	Receive and transmit Ontario PPSA VIN searches;	0.20
Nov-22-24	J. Fleisher	MTO matters;	0.50
Nov-22-24	C. Potter	Matters regarding PPSA discharge protocol and related items; correspondence regarding the same;	0.30
Nov-22-24	N. Levine	Call with client regarding auction agreement; correspondence regarding titles; consider outstanding agreements;	0.70
Nov-22-24	S. Kukulowicz	Telephone attendance with N. Levine and M. Clarkson-Maciel regarding Pride sale hearing; review of report on hearing; review of correspondence from counsel for the Monitor regarding MCV contribution accounting request; review of endorsement from the case conference sale hearing;	1.10
Nov-23-24	M. Clarkson-Maciel	Illinois turnover receipt; correspondence;	0.60
Nov-23-24	N. Levine	Comment on release; correspondence regarding POAs;	0.20
Nov-24-24	N. Levine	Correspondence with client regarding liens and asset collection;	0.10
Nov-24-24	C. Potter	Review of revised direction regarding discharge and	0.30

Date	Name	Description	Hours
		correspondence regarding the same;	
Nov-25-24	J. Noel	Discussions with T. Li and S. Rothery regarding sale 001 and sale 002 lien releases;	0.50
Nov-25-24	M. Clarkson-Maciel	Openlane agreement; correspondence;	0.90
Nov-25-24	S. Rothery	Attend to PPSA matters; review draft omnibus direction to discharge PPSA registrations; receive instructions from T. Li with respect to Ontario VIN history searches; review Ontario VIN history search results in respect of proposed sale of vehicles by Ryson; Send omnibus direction to discharge PPSA registrations for signature via DocuSign;	2.00
Nov-25-24	T. Li	Review and revise omnibus direction; correspondence with working group in respect of lien release matters and timing; analyze titling and ownership vehicles in respect of certain motor vehicles; coordinate and review bring-down due diligence searches; finalize omnibus direction for circulation to client; correspondence with S. Rothery in respect of searches review; call with client in respect of ministry of transportation searches (regarding title ownership); draft and send status update to working group in respect of various personal property security workstreams;	5.70
Nov-25-24	J. Fleisher	E-mails to and from T. Li;	0.30
Nov-25-24	S. Kukulowicz	Review of correspondence from Faskens regarding MCV contributions; review of lien release protocol and discussed same with N. Levine;	0.50
Nov-25-24	K. Norman	Receive and review instructions; attend to MTO searches; obtain copies of MTO documents; review search results and prepare report with respect to same; email correspondence with T. Li;	0.70
Nov-25-24	N. Levine	Call with client regarding letter; consider correspondence regarding MCVs; consider discharge issues;	0.80
Nov-26-24	T. Li	Plenary call with counsel to Royal Bank of Canada in respect of lien discharge process and documentary/due diligence issues; revise lien discharge protocol accordingly; internal correspondence and calls with working group in respect of jurisdictionality of PPSA searches, bring-down due diligence and ownership/title matters; review of sale documentation in respect of Ryson sale; further review of PPSA and lien search summary and attend to draft discharges; review of draft discharges prepared by H. Dylewski; attend to other due diligence and PPSA matters;	7.60
Nov-26-24	J. Noel	Discussions with Cassels team regarding sale 001, sale 002 and sale 003 lien releases; review draft PPSA discharges for sale 001; review PPSA searches for sale 001 and sale 002;	3.60
Nov-26-24	M. Clarkson-Maciel	Draft and provide comments to dealer agreement; correspondence on the matter with monitor;	2.50
Nov-26-24	S. Rothery	Attend to PPSA matters; extended discussion with T. Li and J. Noel with respect to PPSA registration discharge process; instruct law clerks to prepare draft PPSA discharges with	7.70

Date	Name	Description	Hours
		respect to proposed sale of vehicles by Ryson; review draft PPSA discharges; Instruct law clerks to order PPSA searches in respect of Pride Entities in British Columbia, Alberta, Saskatchewan, Manitoba, Ontario, Newfoundland and Labrador, New Brunswick, Nova Scotia, and Prince Edward Island; Review PPSA searches in respect of Pride Entities;	
Nov-26-24	Im, Anita	Receive and review instructions; Attend to VIN number, AB, BC, MB, ON, NL, NB, NS, PEI, and SK security searches; email correspondence and discussions with agent with respect to searches; review initial search results and prepare report with respect to same; email correspondence and discussions with working group;	2.00
Nov-26-24	H. Dylewski	Receive and review instructions; prepare draft ON financing change statements;	0.80
Nov-26-24	N. Geary	Correspondence regarding remarketing agreement;	0.30
Nov-26-24	K. Norman	Correspondence with T. Li;	0.10
Nov-26-24	J. Fleisher	Conference call;	0.70
Nov-26-24	C. Potter	Call with Faskens regarding lien discharge and related matters; correspondence regarding the same; matters relating to lien discharges and related matters;	1.00
Nov-26-24	N. Levine	Calls with client regarding lien issues; confer with lending team regarding same; correspondence regarding dealer agreement;	0.50
Nov-27-24	S. Rothery	Attend to PPSA matters; Instruct law clerks to file PPSA discharges with respect to sale of vehicles by Ryson; review PPSA searches in respect of Pride Entities in British Columbia, Alberta, Saskatchewan, Manitoba, Ontario, Newfoundland and Labrador, New Brunswick, Nova Scotia, and Prince Edward Island; consult with T. Li on protocol for discharging liens of secured creditor registered on Pride vehicles;	4.50
Nov-27-24	J. Noel	Discussions with Cassels team regarding PPSA discharge protocol; review correspondence regarding new sale; review PPSA searches for sale 002;	1.60
Nov-27-24	T. Li	Call with J. Trinh in respect of draft lien discharges, omnibus direction and authorization matters; review sale correspondence with Tiger in respect of impending US sales; coordinate and prepare expanded RBC summary chart with S. Rothery and review of same; coordinate and review bring-down due diligence searches in respect of existing RBC registrations; attend to other search and lien release matters;	4.80
Nov-27-24	M. Clarkson-Maciel	Open lane auctioneer agreement; correspondence; review letter from company;	1.70
Nov-27-24	Im, Anita	Attend to VIN number, AB, BC, MB, ON, NL, NB, NS, PEI, and SK security searches; review search results and prepare report with respect to same; email correspondence and discussions with working group;	0.80

Date	Name	Description	Hours
Nov-27-24	H. Dylewski	Receive and review instructions; prepare draft ON financing change statements;	0.40
Nov-27-24	N. Geary	Revise draft Openlane agreement and correspondence with M. Clarkson-Maciel;	0.40
Nov-27-24	N. Levine	Confer with team regarding lien searches; correspondence regarding open lane;	0.40
Nov-27-24	C. Potter	Matters regarding discharge of initial liens on delivery of units; correspondence regarding the same;	0.60
Nov-28-24	S. Rothery	Attend to PPSA matters; review draft PPSA discharges with respect to sale of vehicles by Ryson; consult with T. Li on protocol for discharging liens of secured creditor registered on Pride vehicles; update internal tracking sheet of vehicle sales;	1.40
Nov-28-24	T. Li	Correspondence and calls with internal working group in respect of additional sale documentation and review of PPSA searches; coordinate and finalize draft lien discharges in respect of first sale; correspondence and call with counsel to RBC in respect of certain lien discharges; discussion with J. Trinh in respect of lien release and authorization protocol; attend to other lien discharge and PPSA matters;	2.70
Nov-28-24	J. Noel	Discussions with T. Li and S. Rothery regarding Ministry of Transportation searches; review lien release tracking spreadsheet regarding sales 001-003;	0.70
Nov-28-24	H. Dylewski	Receive and review instructions; attend to the registration of financing statements; receive confirmation of same; correspondence with working group with respect to same;	0.40
Nov-28-24	J. Fleisher	Logistic discussion with T. Li;	0.30
Nov-28-24	S. Kukulowicz	Review of emails and draft Acknowledgement and Waiver regarding vehicle repairs at Pride sites; telephone attendance with N. Levine regarding same; review of correspondence for counsel for Pride in respect to our complaint letter;	0.80
Nov-28-24	N. Geary	Discussions with N. Levine; revise draft release;	0.90
Nov-28-24	N. Levine	Mark up waiver; call with company counsel regarding same; review letter from Pride counsel; call with client regarding schedules; correspondence regarding discharges;	2.10
Nov-28-24	C. Potter	Matters regarding discharges and related registrations; correspondence regarding the same;	0.30
Nov-29-24	S. Rothery	Attend to PPSA matters; Review draft PPSA discharges with respect to sale of vehicles by Ryson; instruct law clerks to order PPSA searches in respect of proposed sale vehicles; review PPSA search results in respect of proposed sale vehicles and summarize applicable liens;	3.30
Nov-29-24	T. Li	Correspondence and calls with internal working group in respect of additional sale documentation and review of PPSA searches; review and analyze certain third-party liens and correspondence with N. Levine, C. Potter regarding same; send summary of same to client; coordinating PPSA	3.40

Date	Name	Description	Hours
		search review and related due diligence with S. Rothery and J. Noel; correspond with client in respect of additional sale transaction and review of initial PPSA search results; attend to other lien discharge and PPSA matters;	
Nov-29-24	J. Noel	Discussions with T. Li and S. Rothery regarding PPSA discharges; review lien release spreadsheet regarding sales 001-004;	0.50
Nov-29-24	M. Clarkson-Maciel	Openlane auctioneer agreement draft; correspondence with client regarding the same;	0.50
Nov-29-24	B. Solhi	Review of Blakes GST/HST draft note to the CRA pertaining to GST/HST treatment of sales and leases; email correspondence with Cassels team regarding same;	1.60
Nov-29-24	Im, Anita	Receive and review instructions; attend to further Ontario VIN PPSA searches; review initial search results and prepare report with respect to same; email correspondence and discussions with working group;	0.40
Nov-29-24	H. Dylewski	Receive and review verification statements; correspondence with working group with respect to same;	0.30
Nov-29-24	S. Kukulowicz	Review of emails regarding tax issues; review of updated repair waiver and status of insurance issues;	1.10
Nov-29-24	N. Levine	Review agreement; address waiver issues; confer with client regarding lien and sale issues; confer with client regarding additional property; discuss risks with Cassels team;	2.20
Nov-30-24	T. Li	Review of draft discharges; review RBC collateral tracking list and revise same;	1.70

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Clarkson-Maciel, Matteo	Business Advisor	79.10	700.00	55,370.00
Geary, Nicola	Partner	4.80	925.00	4,440.00
Solhi, Bobby B.	Partner	5.00	950.00	4,750.00
Fleisher, Jonathan	Partner	11.80	1,130.00	13,334.00
Kukulowicz, Shayne	Partner	41.60	1,650.00	68,640.00
Levine, Natalie	Partner	61.00	1,000.00	61,000.00
Potter, Carla	Partner	14.70	795.00	11,686.50
Noel, J'Davia	Associate	12.90	450.00	5,805.00
Hyderman, Eva	Associate	11.30	450.00	5,085.00
Rothery, Shae	Associate	47.50	450.00	21,375.00
Li, Timon	Associate	68.80	485.00	33,368.00
Urquhart, Braek	Associate	2.10	715.00	1,501.50
Im, Anita	Law Clerk / Paralegal	3.20	350.00	1,120.00
Dylewski, Hannah	Law Clerk / Paralegal	1.90	345.00	655.50
Ebadi, Fatima	Law Clerk / Paralegal	0.50	400.00	200.00

Name	Title	Hours	Rate	Amount
Konechny, Tiffany	Law Clerk / Paralegal	1.20	410.00	492.00
Norman, Krystina	Law Clerk / Paralegal	2.40	360.00	864.00
Trinh, Julia	Law Clerk / Paralegal	0.70	450.00	315.00
Mabanza, Pasha	Law Student	1.00	295.00	295.00
Total (CAD)		371.50		290,296.50
Our Fees		290,296.50		
HST @ 13.00%		37,738.54		
TOTAL FEES & TAXES (CAD)				328,035.04

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

Electronic Due Diligence	722.00
Agency Fees and Disbursements	527.97
PPSA - Registration/Applic./Discharges	72.00
Total Non-Taxable Disbursements	1,321.97

Taxable Disbursements

Binding, Tabs, Disks, etc	4.67
Electronic Due Diligence	1,272.00
Agency Fees and Disbursements	8,433.09
PPSA - Registration/Applic./Discharges	131.40
Total Taxable Disbursements	9,841.16
HST @ 13.00%	1,279.36
Total Taxable Disbursements & Taxes	11,120.52

TOTAL DISBURSEMENTS & TAXES (CAD)	12,442.49
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TOTAL FEES	290,296.50
TOTAL DISBURSEMENTS	11,163.13
TOTAL TAXES	39,017.90
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	340,477.53



Attn: Douglas McIntosh
Alvarez
Royal Bank Plaza, South Tower
200 Bay Street, Suite 2900, P.O. Box 22
Toronto, ON M5J 2J1

Invoice No: 2268594
Date: December 31, 2024
Matter No.: 059366-00005
GST/HST No.: R121379572

Lawyer: Kukulowicz, Shayne
Tel.: (416) 860-6463
E-mail: SKukulowicz@cassels.com

Re: Court-appointment as Manager of certain assets of the Pride Group

Fees for professional services rendered up to and including December 31, 2024

Our Fees	152,937.50
Disbursements	11,499.00
Total Fees and Disbursements	164,436.50
HST @ 13.00%	20,724.61
TOTAL DUE (CAD)	185,161.11

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REMITTANCE ADVICE: Email payment details to payments@cassels.com

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Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1

Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

Online Bill Payments:

Vendor name is **Cassels Brock Blackwell LLP** and
you are required to enter the first six digits of the
matter #

Invoice No: 2268594
Matter No.: 059366-00005

Amount: **CAD 185,161.11**

e-Transfer Payments: payments@cassels.com

Credit Card Payments: payments.cassels.com

Cassels Brock Blackwell LLP | cassels.com

Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL			
Date	Name	Description	Hours
Dec-02-24	S. Rothery	Attend to PPSA matters; prepare draft protocol by which law clerks are to prepare and file PPSA discharges in respect of RBC liens on Pride vehicles; discussion with T. Li regarding draft protocol for discharging RBC liens on Pride vehicles; instruct law clerks to prepare draft PPSA discharges in respect of RBC liens on certain Pride vehicles; review draft PPSA discharges in respect of RBC liens on certain Pride vehicles;	3.20
Dec-02-24	J. Noel	Review draft PPSA discharges with respect to lien releases; discussions with T. Li and S. Rothery regarding lien release protocol;	3.00
Dec-02-24	H. Dylewski	Receive and review instructions; preparing draft ON, NL, NB, NS and PE financing change statements;	1.70
Dec-02-24	S. Kukulowicz	Review of further emails regarding waiver; telephone attendance with N. Levine regarding various issues;	0.60
Dec-02-24	T. Konechny	Attend to matters relating to drafting partial PPSA discharges relating to serial numbered goods;	2.00
Dec-02-24	T. Li	Review [REDACTED]; review and report [REDACTED] to N. Levine and client; review of VIN searches conducted at MTO; review of corresponding PPSA searches and revised lien summary; discussions with J. Noel and S. Rothery regarding due diligence matters and coordinate bring-down diligence in respect of certain assets;	3.80
Dec-02-24	C. Potter	Matters regarding discharges and related matters; correspondence regarding the same;	0.40
Dec-02-24	N. Levine	Respond to inquiries on liens and next steps; revise waiver notice; confer with client regarding outstanding issues	1.00
Dec-03-24	S. Rothery	Attend to PPSA matters; instruct law clerks to prepare draft PPSA discharges in respect of RBC liens on certain Pride vehicles; review draft PPSA discharges in respect of RBC liens on certain Pride vehicles;	0.60
Dec-03-24	J. Noel	Review MTO searches for vehicle registered owners; review sale 003 draft PPSA discharges; discussions with T. Li and S. Rothery regarding lien release protocol;	3.20
Dec-03-24	Im, Anita	Attend to ongoing Ontario VIN PPSA searches; review balance of search results and prepare report with respect to same; email correspondence and discussions with working group;	0.30
Dec-03-24	H. Dylewski	Receive and review instructions; preparing draft ON financing change statement;	0.20
Dec-03-24	J. Fleisher	MTO matters and review of T. Li process;	0.60
Dec-03-24	S. Kukulowicz	Telephone attendance with N. Levine regarding service provider communications;	0.20
Dec-03-24	T. Li	Review of US title matters and orders respect of sale of US	3.30

Date	Name	Description	Hours
		assets; call with client in respect of lien discharge process and timelines; consider certain third-party liens disclosed and revise search summary accordingly; attend and coordinate various other lien and security matters;	
Dec-03-24	C. Potter	Review and consider vesting order and status relating to encumbrances in favour of third parties on collateral management property; matters regarding discharge of encumbrances and related matters;	0.80
Dec-03-24	N. Levine	Call with client; address release issues; address lien issues; consider US sale matters;	0.60
Dec-04-24	S. Rothery	Attend to PPSA matters; instruct law clerks to order PPSA searches in respect of certain Pride vehicles to be sold by Ryson; instruct law clerks to order PPSA searches in respect of certain Pride vehicles to be sold by Tiger; review draft PPSA discharges in respect of RBC liens on certain Pride vehicles to be sold by Ryson;	3.90
Dec-04-24	J. Noel	Discussions with T. Li and S. Rothery regarding lien releases; discussions with T. Li regarding MTO searches;	0.90
Dec-04-24	M. Clarkson-Maciel	Drafting demand letter for stolen vehicle;	1.50
Dec-04-24	H. Dylewski	Receive and review instructions; preparing draft ON financing change statement; attending to the registration of financing statements; receiving confirmation and verification statements of same;	0.70
Dec-04-24	H. Dylewski	Receive and review verification statements; correspondence with working group with respect to same;	0.20
Dec-04-24	F. Ebadi	Receive and review instructions; attending to VIN searches; email correspondence with working group;	0.50
Dec-04-24	S. Kukulowicz	Review of emails regarding missing truck and proposed letter to repair shop; telephone attendance with N. Levine regarding various issues including stolen truck;	0.80
Dec-04-24	T. Konechny	Attend to filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in relation to sale 003; update tracking documents;	0.50
Dec-04-24	C. Potter	Matters regarding disposition of U.S. assets and call with U.S. counsel regarding the same; matters relating to discharge of collateral and correspondence regarding the same;	0.80
Dec-04-24	T. Li	Attend call with client and Tiger in respect of sale of US assets; review of additional due diligence searches in respect of anomalous vehicles and coordinate summary with J. Noel; review, revise and finalize summary document; send report and status update to client; research and correspondence in respect of potential UCC and mechanic's liens and customary pre-sale due diligence with US counsel;	6.50
Dec-04-24	N. Levine	Confer with client regarding outstanding issues; consider approach to stolen vehicle issues; consider request list; address lien issues; comment on draft letter; participate in call with Tiger; correspondence with US counsel;	1.70

Date	Name	Description	Hours
Dec-05-24	S. Rothery	Attend to PPSA matters; Review PPSA searches in respect of certain Pride vehicles to be sold by Ryson; review PPSA searches in respect of certain Pride vehicles to be sold by Tiger; review draft PPSA discharges in respect of RBC liens on certain Pride vehicles to be sold by Ryson; consult with T. Li and J. Noel regarding discharge process;	4.70
Dec-05-24	J. Noel	Discussions with T. Li and S. Rothery regarding lien releases; review PPSA searches and draft PPSA discharges regard lien releases;	1.20
Dec-05-24	H. Dylewski	Receive comments and revise draft ON financing statement;	0.20
Dec-05-24	F. Ebadi	Receive and review search results and preparing report with respect to same; email correspondence with working group;	0.60
Dec-05-24	T. Li	Review draft lien discharges against underlying PPSA registrations; review of Tiger and Ryson sale correspondence and documentation; consider various third-party registrations and discuss same with J. Noel and S. Rothery; discussion with J. Fleisher in respect of [REDACTED] and review of caselaw [REDACTED];	3.30
Dec-05-24	A. Slota	Receive and review instructions; attending to nationwide (all 10 provinces) PPSA VIN due diligence request matters in respect of the following: 1UYVS2530R7223207, 1GRAA0622FW703248, 1UYVS2535R7207116, 1FUJHHR8NLMW8352, 1UYVS2537L6915039, 527SR5325PL033358, 527SR5325PL033361, and 527SR5327PL033359; obtaining copies of corporate documents; reviewing initial search results and preparing summary report with respect to same;	4.00
Dec-05-24	T. Konechny	Attend to drafting Ontario PPSA partial discharges regarding Sale 004; drafting BC, Alberta, Manitoba, Saskatchewan PPSA partial discharges regarding Sale 004;	1.50
Dec-05-24	N. Levine	Call with company regarding release; confer with client; correspondence regarding liens;	0.30
Dec-06-24	S. Rothery	Attend to PPSA matters; review draft PPSA discharges in respect of RBC liens on certain Pride vehicles to be sold by Ryson; review PPSA searches in respect of certain Pride vehicles to be sold by Tiger; instruct clerks to order PPSA searches in respect of certain Pride vehicles; instruct clerks to discharge PPSA registrations in respect of vehicles sold by Ryson;	1.10
Dec-06-24	E. Hyderman	Review served aide memoire;	0.10
Dec-06-24	J. Noel	Discussions with T. Li and S. Rothery regarding lien releases; review PPSA searches and draft PPSA discharges regarding lien releases;	0.90
Dec-06-24	M. Clarkson-Maciel	Review affidavit draft;	1.30
Dec-06-24	M. Clarkson-Maciel	Calls with Esther Mann; internal team regarding demand letter for limited power of attorney; review of documentation on the same; correspondence and	1.90

Date	Name	Description	Hours
		amendments to letter to body shop regarding missing trucks;	
Dec-06-24	D. Porter	Receive and review instructions; attending to corporate and security searches for S. Rothery;	0.20
Dec-06-24	D. Porter	Receive and review instructions; attending to corporate and security searches; obtain copies of corporate documents; reviewing search results and preparing report with respect to same; email correspondence and discussions with M. Clarkson-Maciel;	0.30
Dec-06-24	T. Li	Calls and correspondence with client in respect of PPSA registrations and discharge matters; correspond with counsel to RBC in respect of certain PPSA registrations; review of Omnibus Direction and court orders and consider certain third-party discharges; draft issues list and discuss with S. Rothery and J. Noel; coordinate and review additional MTO and PPSA searches;	3.50
Dec-06-24	A. Slota	Attend to ongoing nationwide (all 10 provinces) PPSA VIN due diligence request matters in respect of the following: 1UYVS2530R7223207, 1GRAA0622FW703248, 1UYVS2535R7207116, 1FUJHHR8NLMW8352, 1UYVS2537L6915039, 527SR5325PL033358, 527SR5325PL033361, and 527SR5327PL033359; obtain copies of corporate documents; review balance of all search results and finalize summary report with respect to same;	1.00
Dec-06-24	S. Kukulowicz	Review of variance report from the Pride Entities; review of email regarding buyout of corporate vehicles; emails with N. Levine regarding buyout and other issues; review of Pride Group Aide Memoire regarding motion by Mitsubishi to lift stay; review of updated letter regarding stolen unit and related emails;	1.30
Dec-06-24	N. Geary	Call with J. Clarkson-Maciel regarding direction to Pride regarding Trailer; correspondence regarding release;	0.70
Dec-06-24	T. Konechny	Attend to drafting Ontario, PEI, Newfoundland, New Brunswick and Nova Scotia PPSA partial discharges regarding Sale 004; drafting partial discharges for Sale 006; drafting further PPSA partial discharges;	3.00
Dec-06-24	C. Potter	Matters regarding discharges and related matters; correspondence with respect to the same;	0.30
Dec-06-24	N. Levine	Address waiver, demand and lien issues; consider motion materials; confer with client;	1.00
Dec-07-24	S. Kukulowicz	Review of motion record of the Pride Entities regarding sale of certain real estate and other relief;	0.80
Dec-07-24	T. Li	Review of draft PPSA discharges; review of certain third-party registrations and associated court orders;	1.20
Dec-08-24	S. Rothery	Attend to PPSA matters; review draft PPSA discharges in respect of RBC liens on certain Pride vehicles to be sold by Ryson; review PPSA searches in respect of certain Pride vehicles to be sold by Tiger;	2.30

Date	Name	Description	Hours
Dec-08-24	S. Kukulowicz	Exchanged emails regarding motion to amend Lien Discharge Order; review of Aide Memoire from Mitsubishi regarding lift stay motion;	0.80
Dec-08-24	T. Li	Review draft PPSA discharges and correspondence with S. Rothery regarding same; review third-party lien and e-mail with working group regarding same;	1.20
Dec-08-24	N. Levine	Correspond with client regarding demand letter; review motion record and draft email regarding same;	0.20
Dec-09-24	S. Rothery	Attend to PPSA matters; review draft PPSA discharges in respect of RBC liens on certain Pride vehicles to be sold by Ryson; instruct law clerks to file PPSA discharges in respect of Pride vehicles sold by Ryson; instruct law clerks to prepare draft PPSA discharges in respect of Pride vehicles to be sold by Tiger; discussion with T. Li and J. Noel regarding outstanding RBC liens on vehicles sold by Ryson; instruct law clerks to order PPSA searches in respect of vehicles sold by Ryson; review PPSA searches in respect of vehicles to be sold by Ryson;	5.10
Dec-09-24	E. Hyderman	Review amended order and corresponding endorsement;	0.50
Dec-09-24	J. Noel	Discussions with T. Li and S. Rothery regarding lien releases; review PPSA searches and draft PPSA discharges regard lien releases;	2.90
Dec-09-24	M. Clarkson-Maciel	Draft letter to body shop regarding missing vehicles; tending to matter; review of documentation	1.20
Dec-09-24	H. Dylewski	Receive and review instructions; preparing draft ON, NL, NB, NS and PE financing change statements;	1.70
Dec-09-24	H. Dylewski	Receive and review instructions; preparing draft ON financing change statement;	0.20
Dec-09-24	H. Dylewski	Receive and review instructions; attending to the registration of financing statements; receiving confirmation and verification statements of same; receive and review verification statements; correspondence with working group with respect to same;	1.70
Dec-09-24	F. Ebadi	Receive and review instructions; attending to VIN security searches; email correspondence with working group;	0.50
Dec-09-24	D. Porter	Obtain copies of corporate documents; reviewing search results and updating report with respect to same; email correspondence and discussions with S. Rothery; saving searches to iManage;	0.20
Dec-09-24	D. Porter	Receive and review instructions; attending to corporate and security searches; corresponding with T. Li and S. Rothery;	0.20
Dec-09-24	S. Kukulowicz	Review of endorsement regarding lift stay motion; review of emails regarding ongoing issues recovering VINs;	0.80
Dec-09-24	T. Konechny	Attend to filing Manitoba, BC, Alberta and Saskatchewan PPSA partial discharges in respect of sale 002; update tracking charts; filing discharges in respect of sale 004; drafting partial discharges in respect of sale 007 and 010;	3.00

Date	Name	Description	Hours
Dec-09-24	T. Li	Review of certain third-party liens; calls with client in respect of ongoing search reviews and lien discharges; attending to lien discharges and coordinate additional due diligence and draft discharges with J. Noel and S. Rothery; calls with N. Levin regarding certain PPSA and MTO search matters;	4.70
Dec-09-24	N. Levine	Review endorsement; comment on POA; comment on release; confer with Cassels team regarding liens and sales; revise letter; address tax issues	1.80
Dec-10-24	S. Rothery	Attend to PPSA matters; review draft PPSA discharges in respect of RBC liens on certain Pride vehicles; instruct law clerks to file PPSA discharges in respect of Pride vehicles sold by dealer; instruct law clerks to prepare draft PPSA discharges in respect of Pride vehicles to be sold by dealer; instruct law clerks to order PPSA searches in respect of vehicles to be sold by dealer; discussion with T. Li and J. Noel regarding status of lien discharges on certain Pride vehicles;	3.70
Dec-10-24	J. Noel	Review draft PPSA discharges regarding RBC liens;	2.00
Dec-10-24	M. Clarkson-Maciel	Correspondence on power of attorneys; drafting on the same; various correspondence on BDO receivership order;	2.50
Dec-10-24	D. Porter	Obtain copies of corporate documents; review search results and update report with respect to same; email correspondence and discussions with T. Li and S. Rothery; save searches to iManage;	0.20
Dec-10-24	H. Dylewski	Receive and review instructions; preparing draft ON, NL, NB, NS and PE financing change statements; attending to the registration of financing statements; receiving confirmation and verification statements of same; receive and review verification statements; correspondence with working group with respect to same;	2.90
Dec-10-24	F. Ebadi	Receive and review search results and preparing report with respect to same; email correspondence with working group;	0.50
Dec-10-24	S. Kukulowicz	Review of motion materials including lien discharge issues; telephone attendance with N. Levine;	0.90
Dec-10-24	T. Konechny	Attend to drafting Manitoba, Alberta, BC, and Saskatchewan PPSA partial discharges in respect of sale 008 and special request; filing partial discharges in respect of sale 010;	2.20
Dec-10-24	K. Norman	Obtain copies of security documents; review search results and prepare report with respect to same; email correspondence with S. Rothery;	0.20
Dec-10-24	J. Fleisher	Discussion with T. Li;	0.40
Dec-10-24	T. Li	Review of power of attorney in respect of dealer sales and title information; calls and correspondence with client and working group in respect of lien discharges and due diligence; review and revise lien summary charts; correspondence with US counsel in respect of UCC lien searches and pre-sale due diligence; consider same with	3.70

Date	Name	Description	Hours
Dec-10-24	N. Levine	working group; attending to other security release matters; Calls with client; correspondence regarding liens and discharges; communicate with company counsel; consider waiver issues;	1.10
Dec-10-24	C. Potter	Matters regarding due diligence and related items; correspondence regarding the same;	0.30
Dec-11-24	S. Rothery	Attend to PPSA matters; review draft PPSA discharges in respect of RBC liens on certain Pride vehicles;	0.70
Dec-11-24	J. Noel	Request and review MTO search results; discussions with Cassels team regarding MTO searches;	1.10
Dec-11-24	B. Solhi	Review of letter to the CRA from pertaining to receivership and acting as agent of Pride Group; internal discussion with B. Urquhart and email back regarding our comments;	0.50
Dec-11-24	M. Clarkson-Maciel	Amendments to repair scheduling release agreement; analysis of amendments to lien discharge amendment order; correspondence with client and company regarding both;	1.80
Dec-11-24	H. Dylewski	Receive and review instructions; preparing draft ON, NL, NB, NS and PE financing change statements;	0.80
Dec-11-24	A. Slota	Receive and review instructions; attending to Ontario PPSA VIN due diligence request matters in respect of VIN# VNL4V4NC9EH5LN218463 and 4V4NC9EH5LN218463; obtaining copies of corporate documents; reviewing initial search results with respect to same; discussions with working group in respect of Ministry of Transportation (Ontario) VIN search options, further to same;	0.60
Dec-11-24	S. Kukulowicz	Review of emails regarding sales tax issues and draft letter to CRA;	0.20
Dec-11-24	T. Konechny	Attend to filing partial discharges as to special request 001; update tracking charts; drafting partial discharges in respect of sale 009;	1.50
Dec-11-24	K. Norman	Receive and review instructions; attending to MTO searches; obtain copies of MTO documents; reviewing search results and preparing report with respect to same; Email correspondence T. Li;	1.50
Dec-11-24	T. Li	Review responses to queries received from US counsel in respect of US liens and sale of vehicles by Tiger; draft status update to client; correspondence and calls with client in respect of additional anomalous VINs and request MTO searches accordingly; review title documents in respect of anomalous vehicles and prepare MTO and ownership detail summary for client accordingly; send same to J. Noel for further review and comment; call with M. Clarkson-Maciel in respect of lien release order;	6.00
Dec-11-24	N. Levine	Review records and monitors report; call with company counsel; follow up on lien; prepare for court; calls with client; review tax letter; call with body shop regarding missing vehicle; discuss missing vehicles issues with client;	3.70

Date	Name	Description	Hours
Dec-11-24	B. Urquhart	correspondence regarding lien claims; Review draft email; consider GST/HST implications and comments regarding same;	0.30
Dec-12-24	S. Rothery	Attend to PPSA matters; review draft PPSA discharges in respect of RBC liens on certain Pride vehicles; instruct law clerks to file PPSA discharges in respect of Pride vehicles sold by dealer;	2.30
Dec-12-24	J. Noel	Review MTO search results;	1.40
Dec-12-24	M. Clarkson-Maciel	Call with client regarding discharge order amendments; conference with team regarding lending discharges; analysis;	3.00
Dec-12-24	F. Ebadi	Receive and review instructions; attending to VIN searches; email correspondence with working group;	0.30
Dec-12-24	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence request matters in respect of VIN# VNL4V4NC9EH5LN218463 and 4V4NC9EH5LN218463; obtain copies of corporate documents; review balance of all search results with respect to same;	0.40
Dec-12-24	S. Kukulowicz	Review of draft order amending Lien Discharge Order and discussed same with N. Levine and M. Clarkson-Maciel; review of emails regarding revised language for Lien Discharge Order and clarification from counsel for the Pride Entities; review of supplement to Monitors report and revised orders;	1.80
Dec-12-24	T. Konechny	Attend to filing PPSA partial discharges in respect of sale 006; update tracking charts;	0.80
Dec-12-24	K. Norman	Correspondence with S. Wong;	0.40
Dec-12-24	T. Li	Calls and correspondence with client and working group in respect of ongoing lien releases and due diligence over certain US vehicles; discussion with M. Clarkson-Maciel in respect of vesting order and review of same; review leasing documentation and bill of sale template provided by Tiger and prepare comments and markup of same; finalize MTO search analysis and send same to client;	4.00
Dec-12-24	N. Levine	Call with Cassels team regarding materials; call with client regarding materials and open issues; review lease document; correspondence regarding repair shop issues; correspondence with Monitor regarding lien claim issues;	1.80
Dec-13-24	S. Rothery	Attend to PPSA matters; review PPSA search results in respect of Pride vehicles to be sold; instruct law clerks to prepare draft PPSA discharges in respect of certain Pride vehicles to be sold;	1.60
Dec-13-24	J. Noel	Discussions with T. Li regarding RBC liens;	0.50
Dec-13-24	M. Clarkson-Maciel	Lien Discharge order; correspondence regarding titling; review of approved orders;	0.80
Dec-13-24	F. Ebadi	Receive and review search results and providing same to working group;	0.20

Date	Name	Description	Hours
Dec-13-24	S. Kukulowicz	Review of court materials and preparation for hearing; attended hearing which included amendments to the Lien Discharge Order;	1.80
Dec-13-24	T. Konechny	Attend to drafting PPSA partial discharges in respect of special request 004;	1.00
Dec-13-24	J. Fleisher	Discussion with T. Li;	0.30
Dec-13-24	C. Potter	Matters regarding discharge on units and correspondence with respect to the same;	0.30
Dec-13-24	T. Li	Review of additional PPSA draft discharges; review urgent due diligence in respect of certain Ryson vehicles; interpret same and correspondence with N. Levine and C. Potter in respect of third-party liens over such vehicles; review of discretion and powers afforded to Manager in respect of lien releases contained in lien release order and collateral management order; draft and send response to client in respect of urgent Ryson due diligence request; call with client regarding certain post-registration searches and discharge confirmations; revise and finalize draft Bill of Sale template and send same to Tiger;	2.80
Dec-13-24	N. Levine	Call with client regarding leases; review documents regarding same; work on bill of sale and POA issues; follow up with company on tax issues; confer with Cassels team regarding hearing;	0.70
Dec-14-24	T. Li	Review of service contracts and working group correspondence regarding same;	0.20
Dec-14-24	N. Levine	Correspondence regarding bills of sale; draft email regarding lease issues;	0.20
Dec-15-24	S. Rothery	Attend to PPSA matters; review correspondence from law clerks regarding draft discharges in respect of certain Pride vehicles to be sold by dealer;	0.10
Dec-15-24	M. Clarkson-Maciel	Arrange conference;	0.10
Dec-15-24	J. Fleisher	Review of lease and service obligation and respond to group;	0.80
Dec-15-24	S. Kukulowicz	Review of lease documents and related emails;	0.30
Dec-15-24	T. Li	Review of service contracts and working group correspondence regarding same;	0.20
Dec-16-24	S. Rothery	Attend to PPSA matters; review draft PPSA discharges in respect of certain Pride vehicles to be sold by dealers;	0.80
Dec-16-24	J. Noel	Review draft PPSA discharges;	1.10
Dec-16-24	M. Clarkson-Maciel	Conference regarding service contracts;	0.20
Dec-16-24	S. Kukulowicz	Review of sample lease and maintenance agreements and related emails; teams conference with N. Levine et al. regarding assignment of leases but not maintenance contracts; telephone attendance with N. Levine regarding VIN pick-up issues and review of related emails;	1.40
Dec-16-24	J. Fleisher	Internal call and prepare for call regarding bundled lease;	0.40
Dec-16-24	K. Norman	Correspondence with MTO; correspondence with S. Wong;	0.50

Date	Name	Description	Hours
Dec-16-24	C. Potter	Matters regarding discharges and related matters; correspondence regarding the same;	0.50
Dec-16-24	T. Li	Call in respect of lease and service agreements; review draft PPSA discharges; correspond with working group regarding same;	0.60
Dec-16-24	N. Levine	Calls with client regarding leases, pick ups and security; calls either company regarding same; attend to additional requests from client;	2.00
Dec-17-24	S. Rothery	Attend to PPSA matters; review draft PPSA discharges in respect of certain Pride vehicles to be sold by dealers; instruct law clerks to prepare draft PPSA discharges in respect of certain Pride vehicles to be sold by dealers;	2.50
Dec-17-24	T. Li	Calls with client in respect of certain VINs and status of motor vehicles; review of PPSA discharges; correspondence with working group in respect of supplemental due diligence and liens; review orders in respect of Manager's authority to discharge certain VINs and send summary to N. Levine and C. Potter for further review and comment;	1.50
Dec-17-24	J. Noel	Review draft PPSA discharges;	1.20
Dec-17-24	D. Porter	Receive and review instructions; attending to corporate and security searches; obtaining copies of corporate documents; email correspondence and discussions with agent with respect to searches and search summary; reviewing search results and preparing report with respect to same; email correspondence and discussions with S. Rothery;	0.20
Dec-17-24	M. Clarkson-Maciel	Review of redline for openlane; correspondence on the same; correspondence on inventory, DIP interest, and titling;	0.80
Dec-17-24	S. Kukulowicz	Review of various update emails;	0.30
Dec-17-24	J. Fleisher	Review of e-mail regarding lease payment requirement;	0.20
Dec-17-24	T. Konechny	Attend to filing PPSA partial discharges in respect of special request 004;	1.00
Dec-17-24	C. Potter	Call regarding certain truck matters; follow-up regarding the same;	0.40
Dec-17-24	N. Levine	Follow up on pick up issues; confer with team regarding dealer issues; consider lien issues;	0.60
Dec-18-24	S. Rothery	Attend to PPSA matters; review draft PPSA discharges in respect of certain Pride vehicles to be sold by dealers; instruct law clerks to prepare draft PPSA discharges in respect of certain Pride vehicles to be sold by dealers; provide PPSA discharge confirmation statements to client; discussion with T. Li regarding status of secured interests where PPSA registrations include erroneous VINs;	2.10
Dec-18-24	T. Li	Calls with working group in respect of PPSA and lien discharge matters; discussion with N. Levine regarding legal research regarding interpretation of Ontario financing statements; instruction articling student regarding same and conduct preliminary research; review draft PPSA lien	2.50

Date	Name	Description	Hours
		discharges;	
Dec-18-24	J. Noel	Discussions with T. Li, S. Rothery, and J. Fleisher regarding lien releases and discharge of Bennington registration;	0.60
Dec-18-24	D. Porter	Receive and review instructions; attending to corporate and security searches; obtaining copies of corporate documents for T. Li;	0.30
Dec-18-24	M. Clarkson-Maciel	Correspondence;	0.10
Dec-18-24	H. Dylewski	Receive and review verification statements; correspondence with working group with respect to same;	0.20
Dec-18-24	H. Dylewski	Receive and review instructions; preparing draft ON financing change statements;	0.30
Dec-18-24	J. Fleisher	Discussion with J. Noel regarding VIN; call with N. Levine;	0.70
Dec-18-24	N. Levine	Calls with client; research perfections issues; discuss same with Cassels team; consider pick up issues and appropriate next steps including court relief;	1.10
Dec-19-24	S. Rothery	Attend to PPSA matters; update internal tracking sheet of lien release status by sale batch; review draft PPSA discharges in respect of certain Pride vehicles to be sold by dealers;	0.50
Dec-19-24	J. Noel	Discussions with T. Li regarding lien releases;	0.20
Dec-19-24	D. Porter	Obtain copies of corporate documents; review search results and update report with respect to same; email correspondence and discussions with T. Li; save searches to iManage;	0.40
Dec-19-24	T. Li	Calls with client in respect of impending Ryson sales; coordinate due diligence searches in respect corporate vehicles and review interim results; draft reporting summary to client regarding same;	2.40
Dec-19-24	K. Norman	Correspondence with MTO;	0.20
Dec-19-24	S. Kukulowicz	File administrator; review of updates regarding VIN repossessions;	0.30
Dec-19-24	N. Levine	Assist with resolution of pick up issues; confer with client regarding next hearing;	0.50
Dec-20-24	S. Rothery	Attend to PPSA matters; review correspondence from client with respect to potential sale of certain Pride vehicles; Instruct law clerks to order Ontario PPSA searches in respect of certain Pride vehicles to be sold by dealer; review draft PPSA discharges in respect of certain Pride vehicles to be sold by dealer;	0.70
Dec-20-24	Im, Anita	Receive and review instructions; attending to ON PPSA VIN number searches; email correspondence with working group with respect to same;	0.30
Dec-20-24	D. Porter	Receive and review instructions; attending to corporate and security searches; corresponding with S. Rothery;	0.20
Dec-20-24	M. Clarkson-Maciel	Call with client regarding next steps; various correspondence; considering draft agreement regarding disposal of personal vehicles;	2.80

Date	Name	Description	Hours
Dec-20-24	T. Li	Review of PPSA and motor vehicle searches in respect of corporate vehicles analysis; revise and finalize summary and circulate to client for further review and comment; conduct statutory and case law research in respect of [REDACTED] and call with S. Zhou regarding same; revise research report;	3.70
Dec-20-24	C. Potter	Matters regarding discharge matters and related items; correspondence regarding the same;	0.40
Dec-21-24	S. Rothery	Attend to PPSA matters; review draft PPSA discharges in respect of certain Pride vehicles to be sold by dealer;	0.20
Dec-22-24	S. Rothery	Attend to PPSA matters; review draft PPSA discharges in respect of certain Pride vehicles to be sold by dealer; review Ontario PPSA search results in respect of certain Pride vehicles to be sold;	3.20
Dec-22-24	T. Li	Review of lien searches and corresponding draft discharges; correspond with S. Rothery regarding same;	0.20
Dec-23-24	S. Rothery	Attend to PPSA matters; review Ontario PPSA search results in respect of certain Pride vehicles to be sold; instruct law clerks to prepare draft PPSA discharges in respect of certain Pride vehicles to be sold by dealer; review draft PPSA discharges in respect of certain Pride vehicles to be sold by dealer;	2.90
Dec-23-24	T. Li	Draft and finalize legal research summary in respect of PPSA interpretation matters and circulate report to N. Levine and J. Fleisher for further review and comment; call with client in respect of impending Ryson sale closing; review of lien discharges and due diligence searches; call with S. Rothery in respect of motor vehicle diligence and third-party liens; review and revise lien summaries; review correspondence in respect of corporate vehicles and vehicles with incorrect VINs; attending to other security and discharge matters;	3.30
Dec-23-24	M. Clarkson-Maciel	Draft dealer agreement;	2.30
Dec-23-24	H. Dylewski	Receive and review instructions; preparing draft ON, NL, NB, NS and PE financing change statements;	1.30
Dec-23-24	D. Porter	Obtain copies of corporate documents; review search results and update report with respect to same; email correspondence and discussions with S. Rothery; save searches to iManage;	0.20
Dec-23-24	T. Konechny	Attend to drafting Alberta, British Columbia, Manitoba, and Saskatchewan PPSA partial discharges as to sale 013 and sale 012;	1.00
Dec-23-24	J. Fleisher	Review of legal memo regarding PPSA registration and motor vehicle line;	0.30
Dec-24-24	N. Levine	Correspondence regarding pick ups; POAs and next steps;	0.30
Dec-26-24	T. Li	Review of lien discharge documentation; correspondence with client regarding same; coordinate lien discharges with working group;	0.40
Dec-26-24	J. Noel	Review draft PPSA discharges;	1.00

Date	Name	Description	Hours
Dec-27-24	T. Li	Attend to discharge matters and correspondence with working group regarding same;	0.10
Dec-27-24	S. Rothery	Attend to PPSA matters; review draft PPSA discharges in respect of certain Pride vehicles to be sold by dealer; correspond with client regarding discharge of PPSA registrations against certain Pride vehicles to be sold by dealer; update internal tracking sheet of Pride vehicles sold by dealer;	0.40
Dec-27-24	S. Kukulowicz	Review of emails regarding pick-up deadlines and related issues;	0.20
Dec-27-24	N. Geary	Review and comment on draft Canam agreement;	0.70
Dec-27-24	T. Konechny	Attend to filing PPSA partial discharges as to sale 012 and regarding non-RBC liens; update tracking lists;	1.00
Dec-27-24	M. Clarkson-Maciel	Consignment agreement; comments on the same;	1.50
Dec-27-24	N. Levine	Correspondence regarding agreement; correspondence regarding pick ups;	0.20
Dec-28-24	N. Levine	Revise agreement; review correspondence and consider court application;	0.80
Dec-29-24	M. Clarkson-Maciel	Draft consignment agreement; correspondence on the same;	2.20
Dec-29-24	N. Levine	Review and comment on agreement;	0.40
Dec-30-24	N. Geary	Review and comment on draft consignment sale agreement;	1.10
Dec-30-24	S. Rothery	Attend to PPSA matters; discussion with T. Li and J. Noel regarding draft limited powers of attorney made in favour of Tiger to re-title certain Pride vehicles; review VINs listed in Schedule "A" to each draft limited power of attorney made in favour of Tiger to re-title certain Pride vehicles; update internal tracking sheet of Pride vehicles to be sold by dealer;	1.40
Dec-30-24	J. Noel	Discussions with T. Li and S. Rothery regarding powers of attorney; review schedules to powers of attorney regarding VINs attached;	1.80
Dec-30-24	M. Clarkson-Maciel	Dealing with consignment agreement;	3.20
Dec-30-24	H. Dylewski	Receive and review verification statements; correspondence with working group with respect to same;	0.30
Dec-30-24	S. Kukulowicz	Review of emails and telephone attendance with N. Levine regarding pick-up deadline for 30 vehicles; reviewed and revised draft letter to counsel for Pride Entities;	1.10
Dec-30-24	J. Trinh	Attend to Ministry of Transportation VIN search with respect to VIN 1FUJGLD57FLGB2220;	0.30
Dec-30-24	T. Li	Review of due diligence searches and draft lien releases; correspondence with client and working group in respect of Tiger POAs; coordinate with J. Noel and S. Rothery and review of schedules thereto and underlying motor vehicle assets; attending to other lien discharge and security matters;	1.70

Date	Name	Description	Hours
Dec-30-24	N. Levine	Revise POAs; discuss same with Cassels team; revise letter to company; call with company; various calls with client and Cassels team regarding strategy;	1.80
Dec-31-24	S. Kukulowicz	Review of updates regarding removal of additional vehicles;	0.30
Dec-31-24	T. Li	Review correspondence in respect of Tiger powers of attorney;	0.10
Dec-31-24	N. Levine	Work on POA and bill of sale issues; calls with client regarding same;	1.20

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Clarkson-Maciel, Matteo	Business Advisor	27.20	700.00	19,040.00
Geary, Nicola	Partner	2.50	925.00	2,312.50
Solhi, Bobby B.	Partner	0.50	950.00	475.00
Fleisher, Jonathan	Partner	3.70	1,130.00	4,181.00
Kukulowicz, Shayne	Partner	13.90	1,650.00	22,935.00
Levine, Natalie	Partner	23.00	1,000.00	23,000.00
Potter, Carla	Partner	4.20	795.00	3,339.00
Rothery, Shae	Associate	44.00	450.00	19,800.00
Hyderman, Eva	Associate	0.60	450.00	270.00
Noel, J'Davia	Associate	23.00	450.00	10,350.00
Li, Timon	Associate	60.90	485.00	29,536.50
Urquhart, Braek	Associate	0.30	715.00	214.50
Im, Anita	Law Clerk / Paralegal	0.60	350.00	210.00
Dylewski, Hannah	Law Clerk / Paralegal	12.40	345.00	4,278.00
Porter, Danielle	Law Clerk / Paralegal	2.40	345.00	828.00
Ebadi, Fatima	Law Clerk / Paralegal	2.60	400.00	1,040.00
Slota, Alex	Law Clerk / Paralegal	6.00	400.00	2,400.00
Konechny, Tiffany	Law Clerk / Paralegal	18.50	410.00	7,585.00
Norman, Krystina	Law Clerk / Paralegal	2.80	360.00	1,008.00
Trinh, Julia	Law Clerk / Paralegal	0.30	450.00	135.00
Total (CAD)		249.40		152,937.50

Our Fees 152,937.50

HST @ 13.00% 19,881.88

TOTAL FEES & TAXES (CAD) 172,819.38

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

Electronic Due Diligence	1,090.00
Driver's License Searches	2,632.00
PPSA - Registration/Applic./Discharges	988.95
BC Online - PPSA Search/Registrations	149.50
Corporate Filings	156.00
Total Non-Taxable Disbursements	5,016.45

Taxable Disbursements

Electronic Due Diligence	1,904.00
PPSA - Registration/Applic./Discharges	4,451.20
Delivery	127.35
Total Taxable Disbursements	6,482.55
HST @ 13.00%	842.73
Total Taxable Disbursements & Taxes	7,325.28

TOTAL DISBURSEMENTS & TAXES (CAD)	12,341.73
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TOTAL FEES	152,937.50
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TOTAL DISBURSEMENTS	11,499.00
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TOTAL TAXES	20,724.61
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TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	185,161.11
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OUTSTANDING INVOICES

Invoice Number	Invoice Date	Bill Amount	Payments / Credits	Balance Due
2263273	12/20/24	340,477.53	0.00	340,477.53
2268594	12/31/24	185,161.11	0.00	185,161.11
Total (CAD)		525,638.64	0.00	525,638.64



Attn: Douglas McIntosh
Alvarez & Marsal Canada Inc., in its capacity as
Court-Appointed Manager over certain property of
TPine Leasing Capital Corporation et al.
200 Bay Street, Suite 3501
Royal Bank Plaza, South Tower
Toronto, ON M5J 2J1

Invoice No: 2269945
Date: February 12, 2025
Matter No.: 059366-00005
GST/HST No.: R121379572

Lawyer: Kukulowicz, Shayne
Tel.: (416) 860-6463
E-mail: SKukulowicz@cassels.com

Re: Court-appointment as Manager of certain assets of the Pride Group

Fees for professional services rendered up to and including January 31, 2025

Our Fees	173,475.00
Disbursements	8,397.54
Total Fees and Disbursements	181,872.54
HST @ 13.00%	23,424.76
TOTAL DUE (CAD)	205,297.30

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40 Temperance St., Toronto, ON, M5H 0B4 Canada

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matter #

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Matter No.: 059366-00005
Amount: **CAD 205,297.30**

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Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL			
Date	Name	Description	Hours
Jan-02-25	M. Clarkson-Maciel	Confer with team regarding the Canam agreement; raise agreement for N. Geary;	2.40
Jan-02-25	S. Kukulowicz	Review of letter agreement regarding Multi-Collateral Vehicles;	0.30
Jan-02-25	T. Li	Calls with N. Levine in respect of PPSA and security matters; review of vesting order and collateral management order; review of CCAA stay; correspondence with S. Rothery and J. Noel in respect of impending Tiger sales, documentation and review of draft lien discharges;	0.60
Jan-02-25	N. Levine	Follow up on POAs; review orders regarding dealer agreement and modification to same;	1.30
Jan-03-25	S. Rothery	Attend to PPSA matters; review draft PPSA discharges in respect of certain Pride vehicles to be sold by dealer;	0.10
Jan-03-25	S. Kukulowicz	Review of emails regarding MCV Letter Agreement;	0.30
Jan-03-25	J. Fleisher	Review of letter regarding settlements;	0.30
Jan-03-25	N. Levine	Consider MCV agreement for manager; correspondence with company regarding POAs;	0.50
Jan-05-25	N. Levine	Consider MCV issues; correspondence regarding same; address outstanding issues with client;	0.40
Jan-06-25	M. Clarkson-Maciel	Correspondence regarding pickups and MCV issues; conference with client;	2.10
Jan-06-25	S. Kukulowicz	Review of further emails regarding MCV agreements;	0.20
Jan-06-25	N. Levine	Call with client regarding next steps and outstanding matters; correspond with company outstanding POAs; mark up agreement; consider legal issues;	1.60
Jan-07-25	S. Rothery	Attend to PPSA matters; instruct law clerks to prepare draft PPSA discharges in respect of certain Pride vehicles subject to insurance claims; review draft PPSA discharges; update internal status tracking sheet of Pride vehicle sales and discharges;	0.70
Jan-07-25	H. Dylewski	Receive and review instructions; prepare draft ON, NL, NB, NS and PE financing change statements;	1.00
Jan-07-25	M. Clarkson-Maciel	Correspondence regarding insurance claims; review documents regarding same;	0.40
Jan-07-25	S. Kukulowicz	Telephone attendance with N. Levine regarding status;	0.20
Jan-07-25	T. Konechny	Attend to drafting BC, AB, SK, and MB PPSA partial discharges as to special request 008;	0.40
Jan-07-25	T. Li	Coordinate lien and collateral release matters and correspond with working group regarding same;	0.40
Jan-07-25	N. Levine	Calls with client regarding next steps; calls with company counsel; correspondence regarding same; prepare for hearing; review motion materials;	2.70
Jan-08-25	S. Rothery	Attend to PPSA matters; review draft PPSA discharges; instruct law clerks to order PPSA searches in respect of certain Pride vehicles to be sold by dealer; review PPSA	1.80

Date	Name	Description	Hours
		search results; update internal status tracking sheet of Pride vehicle sales and discharges;	
Jan-08-25	J. Noel	Discussions with Cassels team regarding lien release diligence;	0.60
Jan-08-25	M. Clarkson-Maciel	Review correspondence regarding court application and next steps; revise agreement per instructions;	2.00
Jan-08-25	F. Ebadi	Receiving and reviewing instructions; attend to VIN searches; review search results and prepare interim report with respect to same; email correspondence with working group;	0.30
Jan-08-25	S. Kukulowicz	Review of Pride entity motion record regarding deadline to remove all securitized assets and related relief; telephone attendance with N. Levine regarding dealing with insurance proceeds and other issues;	0.80
Jan-08-25	T. Li	Coordinate lien and collateral release matters and correspond with working group regarding same;	0.40
Jan-08-25	N. Levine	Work on agreements and sale issues; calls with company and client regarding next steps; work on POA issues and auction issues; prepare for next hearing; address lien issues;	2.00
Jan-09-25	S. Rothery	Attend to PPSA matters; instruct law clerks to order PPSA searches in respect of certain Pride vehicles to be sold by dealer; review PPSA search results; Instruct law clerks to prepare draft PPSA discharges in respect of certain Pride vehicles to be sold by dealer; review draft PPSA discharges; update internal status tracking sheet of Pride vehicle sales and discharges;	1.60
Jan-09-25	D. Karlin	Discussion with B. Urquhart; review and consider amendments to consignment agreement;	1.70
Jan-09-25	F. Ebadi	Receive and review search results and preparing report with respect to same; Email correspondence with the working group;	0.20
Jan-09-25	D. Porter	Receive and review instructions; attend to corporate and security searches; obtain copies of corporate documents; review search results and prepare report with respect to same; email correspondence and discussions with S. Rothery;	0.20
Jan-09-25	B. Solhi	Review of Dealer Agreement and Consignment Agreement for tax aspects; email correspondence from B. Urquhart pertaining to back-to-back supplies;	1.00
Jan-09-25	T. Konechny	Attend to drafting PPSA partial discharges and discharge in connection with sale 014;	0.70
Jan-09-25	C. Potter	Matters regarding consignment registrations and correspondence regarding new dealer agreement;	0.30
Jan-09-25	T. Li	Coordinate lien and collateral release matters and correspond with working group regarding same; analysis and correspondence in respect of private vehicles and potential sale of same; review of orders in respect of Canam dealer agreement;	1.40

Date	Name	Description	Hours
Jan-09-25	N. Levine	Correspondence regarding POAs and agreement; respond to inquiries regarding managership and applicable assets; consider motion materials;	1.90
Jan-09-25	B. Urquhart	Review Agreement; review previous advice; considering commodity tax implications of same; comment on same;	1.90
Jan-10-25	S. Rothery	Attend to PPSA matters; review PPSA search results; Review draft PPSA discharges; update internal status tracking sheet of Pride vehicle sales and discharges; instruct law clerks to order corporate profile reports and PPSA searches in respect of new dealer;	0.90
Jan-10-25	Im, Anita	Receive and review instructions; conduct preliminary searches; attend to corporate and security searches; obtain corporate documents; review search results and prepare report with respect to same; email correspondence with working group;	0.50
Jan-10-25	J. Noel	Review draft PPSA discharges;	0.80
Jan-10-25	E. Hyderman	Draft letter to opposing counsel regarding upcoming motion; correspondence with N. Levine regarding same;	1.10
Jan-10-25	M. Clarkson-Maciel	Incorporate specialist comments to agreements; correspondence related to hearings;	2.30
Jan-10-25	D. Karlin	Review and consider tax representations; correspondence with B. Urquhart regarding same;	0.60
Jan-10-25	H. Dylewski	Receive and review instructions; attend to the registration of financing statements; receive confirmation and verification statements of same; correspondence with working group with respect to same;	0.60
Jan-10-25	D. Porter	Obtain copies of corporate documents; review search results and update report with respect to same; email correspondence and discussions with S. Rothery; save searches to iManage;	0.20
Jan-10-25	B. Solhi	Further review and call with B. Urquhart pertaining to tax provisions in Dealer and Consignment Agreements;	0.80
Jan-10-25	T. Li	Coordinate lien and collateral release matters and correspond with working group regarding same; review of Canam dealer agreement; correspondence with client in respect of insurance claims and coordinate draft PMSI notices in respect of sale of corporate vehicles;	1.10
Jan-10-25	S. Kukulowicz	Discussion regarding Pride motion and VIN pick-up timing; review of Monitor's 20th Report;	0.80
Jan-10-25	T. Konechny	Attend to filing BC, AB, SK, and MB PPSA partial discharges as to special request 008;	0.30
Jan-10-25	C. Potter	Matters regarding additional Dealer Agreement; correspondence regarding consignment registrations and notices;	0.30
Jan-10-25	B. Urquhart	Conference with B. Solhi and D. Karlin regarding Agreement revisions; revise same;	1.20
Jan-10-25	N. Levine	Draft correspondence regarding motion materials and	2.00

Date	Name	Description	Hours
Jan-11-25	S. Rothery	report; calls with Fasken regarding same; consider strategy; Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review corporate profile report and PPSA search results in respect of new dealer; draft purchase money security interest letter in respect of new dealer;	1.40
Jan-11-25	N. Levine	Call with client regarding motion; draft letter to company and internal correspondence regarding same;	1.00
Jan-12-25	T. Li	Coordinate lien and collateral release matters and correspond with working group regarding same; coordinate draft PMSI notices in respect of sale of corporate vehicles;	0.50
Jan-12-25	S. Kukulowicz	Telephone attendance with N. Levine regarding correspondence to the Pride Entities and Monitors; revised draft letter; review of factum of the Pride Entities;	1.30
Jan-12-25	N. Levine	Work on agreements; revisions to letters; prepare for court;	0.50
Jan-13-25	T. Li Parizeau	Review agreement;	0.50
Jan-13-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review draft PPSA discharges in respect of certain Pride vehicles to be sold by dealer;	0.20
Jan-13-25	J. Noel	Review draft PPSA discharges;	0.30
Jan-13-25	M. Clarkson-Maciel	Call with client regarding Canam agreement; draft bulk bill of sale; drafting service agreement for Century services; various correspondence;	2.50
Jan-13-25	H. Dylewski	Receive and review instructions; revise draft ON, NL, NB, NS and PE financing change statements;	0.20
Jan-13-25	S. Kukulowicz	Telephone attendance with N. Levine regarding proposed deadlines and strategy; review of court materials; review of final letter sent to counsel for the Pride Entities and the Monitor;	1.60
Jan-13-25	N. Geary	Review of draft bulk sales agreement and draft Canam agreement;	0.60
Jan-13-25	T. Konechny	Attend to drafting British Columbia PPSA partial discharges with respect to sale 015;	0.30
Jan-13-25	N. Levine	Draft correspondence to company and Monitor; revise agreements; consider next steps; calls with client regarding outstanding requests and strategy;	2.10
Jan-14-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review draft PPSA discharges in respect of certain Pride vehicles to be sold by dealer; instruct law clerks to order searches in respect of certain Pride vehicles to be sold by dealer; review PPSA searches in respect of certain Pride vehicles to be sold by dealer;	3.00
Jan-14-25	Im, Anita	Receive and review instructions; attend to security searches; review initial search results and prepare report with respect to same; email correspondence with working	0.80

Date	Name	Description	Hours
		group;	
Jan-14-25	E. Hyderman	Review affidavits and motion records served in connection with the motion returnable January 15, 2025;	0.60
Jan-14-25	J. Noel	Review draft PPSA discharges;	0.80
Jan-14-25	M. Clarkson-Maciel	Incorporate comments on draft agreements;	1.00
Jan-14-25	H. Dylewski	Receive and review instructions; attend to the registration of financing statements relating to Sale 015;	0.20
Jan-14-25	S. Kukulowicz	Review of additional court filings in opposition to Pride motion; office conference with N. Levine; telephone attendance with P. Huff regarding resolution of outstanding issues; teams conference with A&M regarding Pride motion and outstanding issues; follow up discussions with P. Huff; review of supplementary materials filed by Pride and discussed same with N. Levine;	2.30
Jan-14-25	T. Konechny	Attend to filing British Columbia, Alberta, Manitoba and Saskatchewan PPSA partial discharges with respect to sale 015;	0.30
Jan-14-25	C. Potter	Matters relating to PPSA discharge and related matters; correspondence regarding the same;	0.40
Jan-14-25	T. Li	Review of draft lien discharges; correspondence with working group in respect of potential private sale and review of motor vehicle due diligence;	1.00
Jan-14-25	N. Levine	Prepare for call; prepare for hearing; prepare for auction; consider additional materials; confer with company and client;	3.90
Jan-15-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct law clerks to discharge PPSA registrations; instruct law clerks to order searches in respect of certain Pride vehicles to be sold by dealer; review PPSA search results;	2.80
Jan-15-25	J. Noel	Correspond with A&M regarding lien releases;	0.10
Jan-15-25	Im, Anita	Attend to ongoing security searches; review search results and prepare report with respect to same; email correspondence with working group;	1.20
Jan-15-25	M. Clarkson-Maciel	Monitor hearing and review revised orders;	1.40
Jan-15-25	H. Dylewski	Review instructions; attend to the registration of financing statements; receive confirmation and verification statements of same; receive and review Ontario verification statement; correspondence with working group with respect to same;	0.70
Jan-15-25	H. Dylewski	Receive confirmation and verification statements relating to Sale 015; receive and review verification statement; correspondence with working group with respect to same;	0.50
Jan-15-25	S. Kukulowicz	Review of additional court materials; office conference with N. Levine regarding court hearing;	0.70
Jan-15-25	N. Geary	Review and comment on consulting agreement;	0.40
Jan-15-25	T. Konechny	Attend to filing British Columbia, Alberta, Manitoba and	0.30

Date	Name	Description	Hours
		Saskatchewan PPSA partial discharges with respect to sale 008;	
Jan-15-25	J. Trinh	Attend to Ministry of Transportation search in respect of VIN 527SR5323PM031747 and provide report with respect to same;	0.30
Jan-15-25	T. Li	Review of due diligence searches in respect of motor vehicle collateral and discussions with working group regarding same; discussions with S. Rothery in respect of omnibus direction and potential updates to syndicate collateral management order;	0.70
Jan-15-25	N. Levine	Prepare for and attend at court; calls with client regarding outstanding issues; comment on documents; confer with S. Kukulowicz regarding hearing;	5.50
Jan-16-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct law clerks to order searches in respect of certain Pride vehicles to be sold by dealer;	0.40
Jan-16-25	E. Hyderman	Review correspondence regarding Service Contracts letter; review endorsement issued in relation with January 16 hearing;	0.30
Jan-16-25	Im, Anita	Receive and review further instructions; attend to security searches; email correspondence with working group with respect to same;	0.30
Jan-16-25	M. Clarkson-Maciel	Consider endorsement; work on sale issues;	0.70
Jan-16-25	N. Geary	Call with N. Levine regarding bill of sale issue;	0.30
Jan-16-25	S. Kukulowicz	Review of Court endorsement and revised Order; office conference with N. Levine regarding mechanics of dealing with MCVs;	0.90
Jan-16-25	N. Levine	Calls with lender counsel; revisions to sale documents; calls with client; address sale issues and lease issues; consider endorsement and next steps;	3.50
Jan-17-25	S. Rothery	Attend to PPSA matters; discussion with N. Levine, C. Potter, and T. Li regarding status of PPSA discharges against certain Pride vehicles; review draft PPSA discharges in respect of certain Pride vehicles to be sold by dealer;	0.40
Jan-17-25	J. Noel	Review draft PPSA discharges; correspond with A&M regarding lien releases;	0.70
Jan-17-25	E. Hyderman	Review correspondence from N. Levine regarding Service Contracts letter; meeting with N. Levine to discuss drafting motion in writing to amend Collateral Management Order; draft amendment to the Collateral Management Order;	1.40
Jan-17-25	M. Clarkson-Maciel	Correspondence regarding revisions to sale documents; drafting bill of sale documents;	0.80
Jan-17-25	S. Kukulowicz	Review of update emails;	0.20
Jan-17-25	A. Slota	Receive and review instructions; attend to Ontario PPSA due diligence request matters in respect of VIN# 4V4NC9EH3RN652745; conduct and obtain search results in	0.30

Date	Name	Description	Hours
		respect of same;	
Jan-17-25	T. Konechny	Attend to filing PPSA partial discharges with respect to sale 014;	0.50
Jan-17-25	C. Potter	Correspondence regarding discharge matters; supervise discharge matters;	0.30
Jan-17-25	T. Li	Attend to lien discharge and sale matters;	0.20
Jan-17-25	N. Levine	Confer with client; correspondence with syndicate lawyers	0.80
Jan-18-25	N. Levine	Confer with team regarding discharges;	0.10
Jan-20-25	S. Rothery	Attend to PPSA matters; Review PPSA search results; instruct law clerks to prepare draft PPSA discharges; review draft PPSA discharges; update internal status tracking sheet of Pride vehicle sales and discharges;	3.20
Jan-20-25	E. Hyderman	Continue drafting amendment to definition of Management Property under the Amended Syndicate Collateral Management Order; begin drafting notice of motion regarding same; correspondence with N. Levine regarding same; review correspondence with counsel to the Administrative Agent regarding outstanding action items;	1.30
Jan-20-25	M. Clarkson-Maciel	Correspondence regarding bulk sale of vehicles;	0.20
Jan-20-25	H. Dylewski	Receive and review instructions; prepare draft ON, NL, NB, NS and PE financing change statements;	1.00
Jan-20-25	T. Konechny	Attend to drafting British Columbia, Alberta, Manitoba and Saskatchewan PPSA partial discharges with respect to sale 016 and sale 017;	2.00
Jan-20-25	T. Li	Review of draft lien discharges and due diligence searches; correspondence with working group in respect of impending consignment of corporate vehicles; review of consignment agreement and due diligence results in respect of corporate vehicles;	2.00
Jan-20-25	N. Levine	Confer with client; consider amendments to documents; confer with company counsel regarding documents; work on CMO amendment issues;	0.90
Jan-21-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges;	0.20
Jan-21-25	H. Dylewski	Receive and review instructions; prepare draft ON, NL, NB, NS and PE financing change statements;	3.40
Jan-21-25	N. Geary	Call with client to discuss sale of vehicles;	0.40
Jan-21-25	T. Konechny	Attend to drafting British Columbia, Alberta, Manitoba and Saskatchewan PPSA partial discharges with respect to sale 018, sale 019 and sale 020;	0.80
Jan-21-25	N. Levine	Call with client regarding agreement; consider BOS issues; confer with client regarding outstanding POAs;	0.60
Jan-22-25	E. Hyderman	Correspondence with N. Levine regarding amendment to definition of Management Property under the Amended Syndicate Collateral Management Order;	0.40
Jan-22-25	M. Clarkson-Maciel	Revise Century services agreement per instructions;	2.50

Date	Name	Description	Hours
		correspondence with team regarding consulting agreement and comments;	
Jan-22-25	N. Geary	Review and comment on revised consulting agreement and sale document;	0.60
Jan-22-25	N. Levine	Work on NOM and order; consider sale issues; discuss same with client and Cassels team; comment on agreement;	2.60
Jan-22-25	T. Li	Review of draft lien discharges and due diligence searches; correspondence with client in respect of impending U.S. and Canadian sales;	0.60
Jan-23-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct law clerks to order PPSA searches in respect of certain Pride vehicles to be sold by dealer;	0.30
Jan-23-25	J. Noel	Request draft PPSA discharges per lease buyout;	0.30
Jan-23-25	M. Clarkson-Maciel	Amend canam agreement; draft century agreement and correspondence with client regarding the same;	1.10
Jan-23-25	H. Dylewski	Receive and review instructions; prepare draft ON, NL, NB, NS and PE financing change statements;	0.50
Jan-23-25	T. Li	Correspondence in respect of lien discharges and review of same;	0.30
Jan-23-25	N. Geary	Calls with N. Levine, M. Clarkson-Maciel; review of revised agreements;	0.70
Jan-23-25	T. Konechny	Attend to drafting Alberta, British Columbia, Manitoba and Saskatchewan PPSA partial discharges with respect to special request 010 (lease buyout);	0.40
Jan-23-25	N. Levine	Revise order and NOA; confer with company counsel; confer with lender counsel; confer with client; address pick up and sale issues; comment on agreement; calls with Cassels team regarding same;	2.60
Jan-24-25	J. Noel	Discussions with T. Li regarding Canam dealer agreement;	0.20
Jan-24-25	E. Hyderman	Review correspondence between N. Levine and client regarding letters to leasees regarding service contracts; preparing for and attending call with N. Levine, client and counsel to the Administrative Agent regarding outstanding SPV issues and proposed amendment to the Syndicate Collateral Management Order; call with N. Levine regarding notice of motion to amend the Amended Syndicate Collateral Management Order; continue drafting same;	2.10
Jan-24-25	M. Clarkson-Maciel	Correspondence regarding service contracts, canam agreement; negotiations on the same; correspondence on dealer collateral registration;	1.60
Jan-24-25	H. Dylewski	Receive and review instructions; prepare draft ON financing statement;	0.20
Jan-24-25	F. Ebadi	Receive and review instructions; attend to security searches; review search results and prepare interim report with respect to same; email correspondence with working group;	1.50

Date	Name	Description	Hours
Jan-24-25	A. Slota	Receive and review instructions; attend to Ontario PPSA due diligence request matters; conduct and obtain search results in respect of same;	0.30
Jan-24-25	N. Geary	Call with client regarding agreement; internal correspondence;	0.40
Jan-24-25	S. Kukulowicz	Telephone attendance with N. Levine regarding amendment to Collateral Management Order;	0.20
Jan-24-25	T. Li	Draft and revise PMSI notice and PPSA registrations in respect of corporate vehicle sales; correspondence with working group regarding same; attending to lien discharges and review of due diligence search results;	2.80
Jan-24-25	N. Levine	Calls with client; calls with company; calls with lenders; comment on materials; prepare for hearing; consider pick up and insurance issues; calls with Cassels team regarding same;	2.90
Jan-25-25	E. Hyderman	Review precedent notices of motion; continue drafting notice of motion to amend the Collateral Management Order; reviewing and revising Amended Collateral Management Order; correspondence with N. Levine regarding same;	2.60
Jan-26-25	E. Hyderman	Correspondence with N. Levine regarding draft Amended Collateral Management Order;	0.20
Jan-26-25	M. Clarkson-Maciel	Correspondence; motion record;	0.20
Jan-26-25	T. Li	Review and revise PMSI notice in respect of corporate vehicle sales; attending to lien discharges and review of due diligence search results;	0.50
Jan-26-25	N. Levine	Revise motion materials; consider outstanding pick up issues and transfer issues;	0.80
Jan-27-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges;	0.20
Jan-27-25	E. Hyderman	Continue to revise draft amended Syndicate Collateral Management Order; attend call with client, S. Kukulowicz, and N. Levine regarding amendment to the Syndicate Collateral Management Order and case strategy moving forward; email correspondence client, S. Kukulowicz, and N. Levine regarding amendments to the collateral management order;	2.90
Jan-27-25	J. Noel	Review PPSA draft discharges regarding lien releases;	0.50
Jan-27-25	F. Ebadi	Receive and review PPSA VIN search results and prepare report with respect to same; email correspondence with working group;	0.70
Jan-27-25	S. Kukulowicz	Teams conference with A&M regarding amendment of CMO and overall direction of the case; review of draft court materials;	0.80
Jan-27-25	T. Li	Attend to collateral release and lien discharge matters; correspond with working group regarding same;	0.80
Jan-27-25	N. Levine	Revise motion materials; call with client; address report	1.70

Date	Name	Description	Hours
Jan-28-25	S. Rothery	questions; Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct law clerks to order PPSA searches in respect of certain Pride vehicles to be sold by dealer; review draft PPSA discharges; instruct law clerks to file PPSA discharges;	1.60
Jan-28-25	E. Hyderman	Correspondence with N. Levine regarding revisions to the draft Second Amended Syndicate Collateral Management Order; reviewing correspondence regarding First Report of the Monitor;	0.60
Jan-28-25	M. Clarkson-Maciel	Review amended CMO and notice of motion;	9.00
Jan-28-25	H. Dylewski	Receive and review instructions; prepare draft ON, NL, NB, NS and PE financing change statements;	0.40
Jan-28-25	H. Dylewski	Receive and review instructions; attend to the registration of financing statements relating to Sale 010; receive confirmation and verification statements of same; receive and review Ontario verification statement; correspondence with working group with respect to same;	0.50
Jan-28-25	A. Slota	Receive and review ongoing instructions; attend to additional Ontario, Alberta and British Columbia PPSA VIN searches; obtain copies of corporate documents; review initial search results with respect to same;	0.70
Jan-28-25	S. Kukulowicz	Telephone attendance with N. Levine regarding motion to amend CMO and review of related emails;	0.30
Jan-28-25	T. Konechny	Attend to filing Alberta, British Columbia, Manitoba and Saskatchewan PPSA partial discharges with respect to special request 010 (lease buyout); drafting Alberta, British Columbia, Saskatchewan and Manitoba PPSA partial discharges as to special request 011 (insurance payout);	0.80
Jan-28-25	T. Li	Attend to collateral release and lien discharge matters; correspond with working group regarding same;	0.60
Jan-28-25	N. Levine	Revise order; revise NOM; review report; call with Monitor; calls with client; discuss open issues with lender counsel; consider sale issues for client;	4.50
Jan-29-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct law clerks to order PPSA searches in respect of certain Pride vehicles to be sold by dealer;	0.30
Jan-29-25	E. Hyderman	Review correspondence regarding revisions to Amended Syndicate Collateral Management Order and Notice of Motion; review and revise draft first report of the monitor and draft notice of motion; correspondence with N. Levine and M. Clarkson-Maciel regarding same;	2.70
Jan-29-25	M. Clarkson-Maciel	Revise notice of motion per instructions; amendments to the same following correspondence; meeting with client regarding manager's report to court; amendments and review of manager's report prepared by client;	4.70
Jan-29-25	A. Slota	Attend to ongoing Ontario, Alberta and British Columbia	0.80

Date	Name	Description	Hours
		PPSA VIN searches; obtain copies of corporate documents; review balance of all search results with respect to same; subsequently received new instructions to conduct Ontario and Alberta PPSA VIN searches; obtain and review initial search results, further to same;	
Jan-29-25	S. Kukulowicz	Review of draft First Report of the Manager and related emails; telephone attendance with N. Levine;	1.10
Jan-29-25	C. Potter	Respond to queries regarding PPSA discharges and correspondence regarding the same;	0.30
Jan-29-25	N. Levine	Confer with Monitor's counsel; review materials; confer with Fasken; revise documents; call with Monitor's counsel;	2.80
Jan-30-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches; Review draft PPSA discharges;	1.70
Jan-30-25	J. Noel	Review draft PPSA discharges regarding lien releases;	0.60
Jan-30-25	E. Hyderman	Review served motion record; correspondence with N. Levine and M. Clarkson-Maciel regarding motion record; review correspondence from client regarding draft notice of motion and draft First Report of the Manager; prepare draft affidavit of service; prepare draft service letter; review comments and revisions to the First Report of the Manager; prepare to serving materials; review compiled motion record; serving motion materials via email to the service list; revise and swear affidavit of service regarding service via email; call with N. Levine regarding same;	5.80
Jan-30-25	M. Clarkson-Maciel	Numerous correspondence and conferences regarding reports; notices of motion; draft order; service;	5.00
Jan-30-25	H. Dylewski	Receive comments and revise draft financing statements; prepare draft ON, NL, NB, NS and PE financing change statements;	1.50
Jan-30-25	A. Slota	Attend to ongoing Ontario PPSA VIN searches; obtaining copies of corporate documents; review balance of all search results with respect to same;	0.30
Jan-30-25	T. Konechny	Attend to revising and drafting Alberta, British Columbia, Manitoba and Saskatchewan PPSA partial discharges with respect to sales 017 (A) and 017 (B) (Ryson);	0.80
Jan-30-25	T. Li	Attend to collateral release and lien discharge matters; correspond with working group regarding same	0.60
Jan-30-25	N. Levine	Finalize report; calls with client and Cassels team; confer with Monitor; review motion record of the company; addressing pick up and VIN issues; discuss additional assets with client; supervise service;	5.40
Jan-31-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; Instruct clerk to order PPSA searches in respect of certain Pride vehicles to be sold by dealer;	1.50
Jan-31-25	J. Noel	Discussions with S. Rothery and T. Li regarding lien release requests;	0.40

Date	Name	Description	Hours
Jan-31-25	E. Hyderman	Call with N. Levine regarding factum in support of motion to further amend the Syndicate Collateral Order; reviewing first draft of the factum; correspondence with M. Clarkson-Maciel regarding same; meeting with N. Levine, M. Clarkson-Maciel and J. Jackson regarding the factum; cause materials to be served via courier onto parties without email addresses on the service list; prepare and swear supplemental affidavit of service; review correspondence confirming affidavit was appropriately filed;	2.60
Jan-31-25	M. Clarkson-Maciel	Draft factum regarding motion to amend order; review work on subsequent drafts prepared by E. Hyderman; conference with team regarding next steps; handover;	6.70
Jan-31-25	H. Dylewski	Receive and review instructions; attend to the registration of financing statements; receive confirmation and verification statements of same; receive and review Ontario verification statement; correspondence with working group with respect to same;	0.50
Jan-31-25	J. Jackson	Review and analyze initial monitor report and motion record; team meetings with N. Levine, E. Hyderman and M. Clarkson-Maciel to discuss factum strategy;	5.10
Jan-31-25	A. Slota	Receive and review instructions; attend to Ontario, Alberta and Saskatchewan PPSA VIN searches; obtain copies of corporate documents; review initial search results with respect to same;	0.60
Jan-31-25	A. Slota	Receive and review instructions; attend to Ontario PPSA VIN searches; obtain copies of corporate documents; review initial search results with respect to same;	0.90
Jan-31-25	A. Slota	Receive and review instructions; attend to Ontario and Alberta PPSA VIN searches; obtain copies of corporate documents; review initial search results with respect to same;	0.40
Jan-31-25	A. Slota	Receive and review instructions; attend to Ontario, Saskatchewan and Alberta PPSA VIN searches; obtain copies of corporate documents; review initial search results with respect to same;	0.80
Jan-31-25	A. Slota	Receive and review instructions; attend to Ontario, Alberta, British Columbia and Saskatchewan PPSA VIN searches; obtain copies of corporate documents; review initial search results with respect to same;	1.20
Jan-31-25	T. Konechny	Attend to filing Alberta, British Columbia, Saskatchewan and Manitoba PPSA partial discharges as to special request 011 (insurance payout);	0.40
Jan-31-25	T. Li	Correspondence and calls with client in respect of potential repossession of Quebec and Ontario collateral; internal discussions and correspondence with J. Fleisher regarding same; order initial due diligence searches and coordinate review of same; attending to other collateral release and discharge matters;	1.60

Date	Name	Description	Hours
Jan-31-25	N. Levine	Prepare for hearing; calls with company counsel; calls with lender counsel; review materials; prepare factum; correspondence regarding lien issues;	2.50

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Clarkson-Maciel, Matteo	Business Advisor	46.60	700.00	32,620.00
Li Parizeau, Tera	Partner	0.50	875.00	437.50
Solhi, Bobby B.	Partner	1.80	1,000.00	1,800.00
Kukulowicz, Shayne	Partner	12.00	1,650.00	19,800.00
Geary, Nicola	Partner	3.40	975.00	3,315.00
Fleisher, Jonathan	Partner	0.30	1,190.00	357.00
Levine, Natalie	Partner	57.10	1,025.00	58,527.50
Potter, Carla	Partner	1.60	840.00	1,344.00
Rothery, Shae	Associate	22.30	500.00	11,150.00
Hyderman, Eva	Associate	24.60	500.00	12,300.00
Noel, J'Davia	Associate	5.30	525.00	2,782.50
Karlin, Danielle	Associate	2.30	550.00	1,265.00
Jackson, Joshua	Associate	5.10	625.00	3,187.50
Li, Timon	Associate	16.10	550.00	8,855.00
Urquhart, Braek	Associate	3.10	725.00	2,247.50
Im, Anita	Law Clerk / Paralegal	2.80	400.00	1,120.00
Dylewski, Hannah	Law Clerk / Paralegal	11.20	400.00	4,480.00
Ebadi, Fatima	Law Clerk / Paralegal	2.70	425.00	1,147.50
Porter, Danielle	Law Clerk / Paralegal	0.40	385.00	154.00
Slota, Alex	Law Clerk / Paralegal	6.30	450.00	2,835.00
Konechny, Tiffany	Law Clerk / Paralegal	8.00	450.00	3,600.00
Trinh, Julia	Law Clerk / Paralegal	0.30	500.00	150.00
Total (CAD)		233.80		173,475.00

Our Fees 173,475.00

HST @ 13.00% 22,551.75

TOTAL FEES & TAXES (CAD) 196,026.75

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

Electronic Due Diligence	676.50
BC Online - PPSA Search/Registrations	92.00
PPSA - Registration/Applic./Discharges	264.90
NT Filing Fees	339.00
Driver's License Searches	14.00
Corporate Filings	72.00
Agency Fees and Disbursements	223.69
Total Non-Taxable Disbursements	1,682.09

Taxable Disbursements

Electronic Due Diligence	1,088.00
PPSA - Registration/Applic./Discharges	1,971.30
Delivery	138.38
Agency Fees and Disbursements	3,504.02
Travel	13.75
Total Taxable Disbursements	6,715.45
HST @ 13.00%	873.01
Total Taxable Disbursements & Taxes	7,588.46

TOTAL DISBURSEMENTS & TAXES (CAD)	9,270.55
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TOTAL FEES	173,475.00
TOTAL DISBURSEMENTS	8,397.54
TOTAL TAXES	23,424.76
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	205,297.30

OUTSTANDING INVOICES

Invoice Number	Invoice Date	Bill Amount	Payments / Credits	Balance Due
2268594	12/31/24	185,161.11	0.00	185,161.11
2269945	02/12/25	205,297.30	0.00	205,297.30
Total (CAD)		390,458.41	0.00	390,458.41



Attn: Douglas McIntosh
Alvarez & Marsal Canada Inc., in its capacity as
Court-Appointed Manager over certain property of
TPine Leasing Capital Corporation et al.
200 Bay Street, Suite 3501
Royal Bank Plaza, South Tower
Toronto, ON M5J 2J1

Invoice No: 2276198
Date: March 31, 2025
Matter No.: 059366-00005
GST/HST No.: R121379572
Lawyer: Kukulowicz, Shayne
Tel.: (416) 860-6463
E-mail: SKukulowicz@cassels.com

Re: Court-appointment as Manager of certain assets of the Pride Group

Fees for professional services rendered up to and including February 28, 2025

Our Fees	218,961.50
Less Discount	(21,896.15)
Total Fees	197,065.35
Disbursements	18,693.03
Total Fees and Disbursements	215,758.38
HST @ 13.00%	27,423.52
TOTAL DUE (CAD)	243,181.90

We are committed to protecting the environment.

Please provide your email address to payments@cassels.com to receive invoice and reminder statements electronically.

Payment due upon receipt. Please return remittance advice(s) with cheque.

REMITTANCE ADVICE: Email payment details to payments@cassels.com

Canadian Dollar EFT and Wire

Payments:

Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1

Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

Online Bill Payments:

Vendor name is **Cassels Brock Blackwell LLP** and
you are required to enter the first six digits of the
matter #

Invoice No: 2276198
Matter No.: 059366-00005
Amount: **CAD 243,181.90**

e-Transfer Payments: payments@cassels.com

Credit Card Payments: payments.cassels.com

Cassels Brock Blackwell LLP | cassels.com

Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL			
Date	Name	Description	Hours
Feb-01-25	J. Jackson	Further review applicable materials filed within these CCAA proceedings to develop factum strategy; internal correspondence with Cassels' team to discuss definition of Management Property issues; research s. 11 and s. 36 caselaw regarding orders of the court to amend prior orders and sell assets; and Draft and Revise Factum for motion returnable February 4, 2025;	9.60
Feb-01-25	M. Clarkson-Maciel	Correspondence regarding factum; review of initial draft;	0.70
Feb-01-25	E. Hyderman	Review correspondence with M. Clarkson-Maciel and J. Jackson regarding draft factum in support of motion to approve the Second Amended Collateral Management Order; reviewing Twentieth Report of the Monitor; reviewing supplemental affidavit of Randall Benson; reviewing draft factum; correspondence with J. Jackson regarding same;	2.10
Feb-01-25	S. Kukulowicz	Review of supplemental affidavit filed by the Pride Group;	0.20
Feb-02-25	J. Jackson	Further research and review of case law under; further analysis of prior Court Orders made in the within proceedings; consider revisions to the factum made by CBB team; and further draft and revise factum for N. Levine's review;	4.70
Feb-02-25	M. Clarkson-Maciel	Correspondence regarding factum for Second Amended Collateral Management Order;	0.50
Feb-02-25	J. Fleisher	Respond to T. Li's e-mail regarding Quebec issues;	0.30
Feb-03-25	J. Noel	Review draft PPSA discharges regarding lien releases;	0.80
Feb-03-25	C. Potter	Matters regarding discharges and related matters; correspondence regarding the same;	0.50
Feb-03-25	J. Trinh	Attending to Ministry of Transportation (Ontario) VIN searches (10) and providing report with respect to same;	0.50
Feb-03-25	T. Li	Review of due diligence searches, draft PPSA financing change statements and attending to lien discharge matters;	1.40
Feb-03-25	J. Jackson	Review and consider N. Levine's proposed revisions to the factum and implement same; analyze prior CCAA court orders and compare same to our proposed Second Amended Collateral Management Order; numerous internal meetings with CBB team to discuss the factum; further draft and revise factum; research legal issues surrounding the Nunc Pro Tunc doctrine and provide update on same to N. Levine; prepare and finalize factum for service and for uploading to CaseLines;	5.30
Feb-03-25	E. Hyderman	Correspondence with E. Mann regarding mode of hearing; call with Monitor's counsel regarding service list; review client correspondence regarding draft factum in support of the Second Amended Collateral Management Order; preparing to serve the Manager's factum to the service list; drafting affidavit of service; review aid memoire of Regions	0.90

Date	Name	Description	Hours
		Bank;	
Feb-03-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review draft PPSA discharges in respect of certain Pride vehicles to be sold by dealer; review PPSA searches; instruct clerk to order PPSA searches in respect of certain Pride vehicles to be sold by dealer;	1.00
Feb-03-25	N. Levine	Finalize factum for service; review case law; prepare submissions; consider revisions to order; confer with client regarding sales issues and title issues;	3.50
Feb-03-25	A. Slota	Receiving and reviewing instructions; attending to PPSA VIN searches (conducted in all 9 Canadian common law provinces) in respect of the following: 10 vehicles; obtaining copies of corporate documents; reviewing initial search results with respect to same;	3.00
Feb-03-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN searches in respect of 27 vehicles; obtaining copies of corporate documents; reviewing initial search results with respect to same;	2.00
Feb-03-25	J. Fleisher	E-mails to and from Quebec lawyer regarding due diligence;	0.40
Feb-03-25	S. Kukulowicz	Review of draft factum in support of the Second Amended Collateral Management Order; provided comments on draft factum; telephone attendance with N. Levine regarding various issues; review of Aide Memoire from Regions Bank;	1.70
Feb-03-25	M. Clarkson-Maciel	Draft factum regarding motion; comments on the same; inputting comments from client; drafting; supporting team for service; review motion records; considering limitation on liability language for Canam agreement;	6.50
Feb-04-25	J. Noel	Review draft PPSA discharges regarding lien releases;	1.50
Feb-04-25	T. Li	Correspondence and internal discussion in respect of Canam dealer agreement and sale of corporate vehicles; coordinate local counsel due diligence in respect of contemplated repossession of vehicles and correspondence and follow-up queries regarding same; draft and send e-mail report to client in respect of contemplated repossession of vehicles in Ontario and Quebec; attending to other security and lien discharge matters;	3.30
Feb-04-25	H. Dylewski	Receiving and reviewing instructions; attending to the registration of financing statements; receiving confirmation and verification statements of same; receiving and reviewing Ontario verification statements; correspondence with working group with respect to same;	1.30
Feb-04-25	E. Hyderman	Correspondence with Monitor's counsel regarding service list; review correspondence between N. Levine and Debtors' counsel regarding POAs for uncollected VINs; review correspondence between N. Levine and client regarding same;	0.10
Feb-04-25	S. Rothery	Attend to PPSA matters; update tracking sheet of Pride	1.10

Date	Name	Description	Hours
		vehicle sales and discharges; review PPSA searches; instruct clerk to order PPSA searches in respect of certain Pride vehicles to be sold by dealer;	
Feb-04-25	M. Clarkson-Maciel	Draft amendments to Canam agreement; internal and external correspondence on the same;	4.20
Feb-04-25	N. Geary	Internal correspondence regarding limitation of liability;	0.40
Feb-04-25	T. Konechny	Attend to filing British Columbia, Alberta, Manitoba, and Saskatchewan PPSA partial discharges as to sale 017(A) (Ryson);	0.50
Feb-04-25	S. Kukulowicz	Attended Pride hearing regarding various applicant relief and Manager motion to amend the Second Amended Collateral Management Order; exchanged emails and office conference with N. Levine regarding draft order;	1.40
Feb-04-25	N. Levine	Prepare for and attend court; discussion with Fasken regarding amendments to language; discussion with company counsel regarding same; correspondence with company regarding next hearing issues; address POAs and title issues with company;	2.70
Feb-04-25	A. Slota	Attending to ongoing Ontario PPSA VIN searches in respect of 27 vehicles; obtaining copies of corporate documents; reviewing balance of all search results with respect to same;	0.70
Feb-04-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN searches in respect of 2 vehicles; obtaining copies of corporate documents; reviewing balance of all search results with respect to same;	0.40
Feb-04-25	A. Slota	Attending to ongoing Ontario, Alberta and Saskatchewan PPSA VIN searches in respect of 2 vehicles; obtaining copies of corporate documents; reviewing balance of all search results with respect to same;	0.40
Feb-04-25	A. Slota	Attending to ongoing Ontario PPSA VIN searches in respect of 9 vehicles; obtaining copies of corporate documents; reviewing balance of all search results with respect to same;	0.80
Feb-04-25	A. Slota	Attending to ongoing PPSA VIN searches (conducted in all 9 Canadian common law provinces) in respect of the following: 10 vehicles; obtaining copies of corporate documents; reviewing balance of all search results with respect to same;	2.00
Feb-04-25	A. Slota	Attending to ongoing Ontario, Saskatchewan and Alberta PPSA VIN searches in respect of 2 vehicles; obtaining copies of corporate documents; reviewing balance of all search results with respect to same;	0.60
Feb-04-25	A. Slota	Attending to ongoing Ontario, Alberta, British Columbia and Saskatchewan PPSA VIN searches in respect of 3 vehicles; obtaining copies of corporate documents; reviewing balance of all search results with respect to same;	0.50
Feb-05-25	N. Geary	Call with M. Clarkson-Maciel regarding dealer agreement; review and comment on same;	0.60
Feb-05-25	J. Noel	Review draft PPSA discharges regarding lien releases; attend	2.00

Date	Name	Description	Hours
Feb-05-25	T. Li	to delivery of PMSI notices regarding Canam dealer agreement; Discussion with working group in respect of incorrect VINs on PPSA registrations and implications (if any) on validity of security interest; review of caselaw and statutory research; review of executed Canam dealer agreement and finalize PMSI notice and PPSA registration; coordinate Canam filings and bring-down due diligence; review of searches; attending to other security and lien discharge matters;	4.90
Feb-05-25	H. Dylewski	Receiving comments and revising draft financing statements; preparing draft ON, NL, NB, NS and PE financing change statements; attending to the registration of financing statement; receiving confirmation of same; attending to post-registration search; receiving results of same; receiving and reviewing verification statement; correspondence with working group with respect to same;	1.70
Feb-05-25	M. Clarkson-Maciel	Canam agreement discussion and execution; consideration of release of corporate liens on vehicles;	3.80
Feb-05-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches; instruct law clerks to prepare draft PPSA discharges in respect of certain Pride vehicles to be sold by dealer; discussion with T. Li and J. Noel regarding CANAM-APPRAIZ INC. consignment agreement;	2.90
Feb-05-25	T. Konechny	Attend to revising draft Alberta, British Columbia, Manitoba and Saskatchewan PPSA partial discharges as to sale 017 (Ryson); drafting Alberta, British Columbia, Manitoba and Saskatchewan PPSA partial discharges as to sale 023 (Ryson);	0.80
Feb-05-25	S. Kukulowicz	Review of emails regarding interim distributions; office conference with N. Levine; teams conference with A&M regarding distributions;	1.10
Feb-05-25	N. Levine	Address additional agreement; work on outstanding VIN issues; consider case law research; discuss registration issues with Cassels team and client; discuss distribution issues with team and client;	2.50
Feb-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence request matters in respect of 1 vehicle; conducting searches with respect to same;	0.20
Feb-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, British Columbia and Saskatchewan PPSA VIN due diligence request matters in respect of 1 vehicle; obtaining copies of corporate documents; reviewing search results with respect to same;	0.60
Feb-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence request matters in respect of 1 vehicle; obtaining copies of corporate documents; reviewing search results with respect to same;	0.30

Date	Name	Description	Hours
Feb-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, British Columbia and Saskatchewan PPSA VIN due diligence request matters in respect of 2 vehicles; obtaining copies of corporate documents; reviewing search results with respect to same;	1.00
Feb-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence request matters in respect of 3 vehicles; obtaining copies of corporate documents; reviewing initial search results with respect to same;	0.30
Feb-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence request matters in respect of 1 vehicle; obtaining copies of corporate documents; reviewing search results with respect to same;	0.50
Feb-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence request matters in respect of 1 vehicle; obtaining copies of corporate documents; reviewing search results with respect to same;	0.30
Feb-06-25	J. Noel	Call with T. Li and S. Rothery regarding lien releases and Canam dealer agreement;	0.60
Feb-06-25	T. Li	Correspondence with working group and search clerks in respect of incorrect VIN analysis and prepare initial draft of same; correspondence with client regarding various motor vehicle sales from certain dealers and required revisions to draft discharges initially prepared; review of lien discharges in respect of various sales; reconcile client and internal accounting of vehicle sales to date and timing of each; reporting to client regarding Canam PPSA and PMSI matters; attending to other security and due diligence matters;	5.60
Feb-06-25	M. Clarkson-Maciel	Address Canam PMSI matters;	1.00
Feb-06-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches; review draft PPSA discharges; instruct law clerk to order PPSA searches;	2.00
Feb-06-25	J. Fleisher	E-mail regarding Quebec repossession;	0.20
Feb-06-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence request matters in respect of 1 vehicles; obtaining and reviewing search results with respect to same;	0.20
Feb-06-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence request matters in respect of 18 vehicles; obtaining copies of corporate documents; reviewing initial search results with respect to same;	1.80
Feb-06-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence request matters in respect of 3 vehicles; obtaining copies of corporate documents; reviewing balance of all search results with respect to same;	0.30
Feb-06-25	S. Kukulowicz	Review of various orders regarding authority of Manager to make distributions to the Syndicate; review of First	1.40

Date	Name	Description	Hours
		Supplement to the Monitor's 21st Report regarding interim distributions; review of Court endorsement;	
Feb-06-25	N. Levine	Correspondence regarding PSMI registrations and next steps;	0.20
Feb-07-25	J. Noel	Discussions with S. Rothery and T. Li regarding lien releases and Canam dealer agreement; review PPSA search results regarding lien releases; review draft discharges regarding lien releases;	3.50
Feb-07-25	T. Li	Review of lien discharges and due diligence searches; correspondence regarding analysis of incorrect VIN claims;	0.60
Feb-07-25	H. Dylewski	Receiving comments and revising draft financing statements; preparing draft ON, NL, NB, NS and PE financing change statements; attending to the registration of financing statements relating to Sale 017(B) and 023; receiving confirmation and verification statements of same; receiving and reviewing Ontario verification statements; correspondence with working group with respect to same;	3.80
Feb-07-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches; review draft PPSA discharges; instruct law clerk to order PPSA searches; instruct law clerk to prepare draft PPSA discharges;	3.40
Feb-07-25	A. Slota	Attending to Ontario PPSA VIN due diligence request matters in respect of 1 vehicle; conducting searches in respect of same;	0.20
Feb-07-25	A. Slota	Attending to Ontario PPSA VIN due diligence request matters in respect of 1 vehicle; conducting searches in respect of same;	0.20
Feb-07-25	A. Slota	Attending to Ontario PPSA VIN due diligence request matters in respect of 1 vehicle; conducting searches in respect of same;	0.20
Feb-07-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence request matters in respect of 18 vehicles; obtaining copies of corporate documents; reviewing balance of all search results with respect to same;	1.80
Feb-07-25	A. Slota	Attending to Ontario PPSA VIN due diligence request matters in respect of 1 vehicle; conducting searches in respect of same;	0.20
Feb-07-25	T. Konechny	Attend to revising draft Alberta, British Columbia, Manitoba and Saskatchewan PPSA partial discharges as to sale 017 (Ryson); drafting Alberta, British Columbia, Manitoba and Saskatchewan PPSA partial discharges as to sale 032 (Metro); filing partial discharges in respect of sale 017 (B) and 023;	2.20
Feb-07-25	A. Slota	Attending to Ontario PPSA VIN due diligence request matters in respect of 1 vehicle; conducting searches in respect of same;	0.20
Feb-07-25	S. Kukulowicz	Consider operation of various orders and obligations to	0.80

Date	Name	Description	Hours
		report; further review of Supplement to Twenty-First Report;	
Feb-09-25	J. Noel	Review draft PPSA discharges regarding lien releases;	1.30
Feb-09-25	N. Levine	Review Monitor's report;	0.50
Feb-10-25	J. Noel	Review draft PPSA discharges;	0.60
Feb-10-25	T. Li	Correspondence regarding Metro sales and expect timing of same; draft solicitor's undertaking in respect of Metro lien discharges and correspondence with working group regarding same; finalize and send execution copy to N. Levine; attending to other lien discharge and due diligence matters;	1.90
Feb-10-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches; review draft PPSA discharges;	2.20
Feb-10-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence request matters in respect of 1 vehicle; obtaining and reviewing search results in respect of same;	0.20
Feb-10-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence request matters in respect of 1 vehicle; obtaining and reviewing search results in respect of same;	0.20
Feb-10-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence request matters in respect of 1 vehicle; obtaining and reviewing search results in respect of same;	0.20
Feb-10-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence request matters in respect of 1 vehicle; obtaining and reviewing search results in respect of same;	0.20
Feb-10-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence request matters in respect of 1 vehicle; obtaining and reviewing search results in respect of same;	0.20
Feb-10-25	J. Fleisher	Review of undertaking;	0.40
Feb-10-25	S. Kukulowicz	Telephone attendance with N. Levine regarding distribution issues; review of motion record of Pride Entities regarding various relief;	0.90
Feb-10-25	N. Levine	Call with client regarding distributions; review additional documents; call with Cassels team; prepare additional documents; correspondence regarding same;	1.20
Feb-11-25	J. Noel	Review draft PPSA discharges; review PPSA search results regarding lien releases; discussions with S. Rothery and T. Li regarding lien releases;	1.70
Feb-11-25	C. Potter	Matters regarding discharges and undertaking; review correspondence regarding the same;	0.40
Feb-11-25	T. Li	Review and revise undertaking to discharge; review of Second Amended Collateral Management Order; revise omnibus direction to discharge; review of various third-party PPSA registrations in relation to previous Ryson and Vision sales and consider implications of same; working group discussion regarding treatment of RSLA liens and	3.10

Date	Name	Description	Hours
		third-party financing statements; review and revise lien release protocol;	
Feb-11-25	H. Dylewski	Receiving and reviewing instructions; attending to the registration of financing statements; receiving confirmation and verification statements of same; receiving and reviewing Ontario verification statement; correspondence with working group with respect to same;	0.60
Feb-11-25	H. Dylewski	Receiving comments and revising draft financing statements; preparing draft ON, NL, NB, NS and PE financing change statements;	0.50
Feb-11-25	M. Clarkson-Maciel	Correspondence regarding undertaking, order schedule;	0.60
Feb-11-25	E. Hyderman	Call with N. Levine to discuss preparation and strategy for February 19 motion hearing; reviewing motion record of the Applicants; reviewing the Twenty First Report and Supplement to the Twenty-First Report of the Monitor; reviewing Revised Governance Protocol to verify if the debtors are to disburse Lease Collections to the Syndicate pursuant to the order; correspondence with N. Levine and S. Kukulowicz regarding same;	2.60
Feb-11-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches; review draft PPSA discharges; instruct clerks to prepare draft PPSA discharges;	6.70
Feb-11-25	N. Levine	Correspondence regarding undertaking; revise same; consider order issues; consider pick up issues; discussion regarding upcoming hearing with lender counsel; correspondence with company counsel regarding recognition; call with E. Hyderman regarding hearing; call with S. Kukulowicz regarding orders;	2.30
Feb-11-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence request matters in respect of 1 vehicle; conducting searches in respect of same;	0.30
Feb-11-25	T. Konechny	Attend to filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges as to sale 020 (velocity); drafting BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges as to sale 024 (Brandt);	0.60
Feb-11-25	S. Kukulowicz	Office conference with N. Levine regarding various distribution and other issues; review of draft undertaking to release liens and provided comments; call with E. Hyderman;	1.30
Feb-12-25	J. Noel	Review draft PPSA discharges; review PPSA searches regarding lien releases; discussions with T. Li and S. Rothery regarding lien releases;	2.00
Feb-12-25	E. Curtis	Reviewing instructions and materials provided by memo and omnibus direction;	0.50
Feb-12-25	T. Li	Review and revise lien release protocol; working group correspondence regarding ongoing due diligence and search matters; review, revise and finalize draft reporting and	5.80

Date	Name	Description	Hours
		analysis in respect of incorrect VIN claims and send same to N. Levine for further review; review and revise draft reporting in respect of potential repossession of certain Ontario and Quebec vehicles and review of local counsel due diligence and advice regarding same; review of draft PPSA discharges and attending to other security and lien release matters;	
Feb-12-25	C. Potter	Matters regarding PPSA discharges and related items; correspondence regarding the same;	0.30
Feb-12-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct law clerk to order PPSA searches; prepare memorandum regarding lien release procedure in preparation for onboarding E. Curtis;	5.00
Feb-12-25	H. Dylewski	Receiving comments and revising draft financing statements relating to Sale 017; preparing draft ON, NL, NB, NS and PE financing change statements relating to Sales 021, 022(A) and 022(B); attending to the registration of financing statements relating to Sale 017(C) and Sale 024; receiving confirmations and verifications of same; receiving and reviewing Ontario verification statements; correspondence with working group with respect to same;	5.00
Feb-12-25	M. Clarkson-Maciel	Correspondence on undertakings; review motion materials and monitor reports;	1.20
Feb-12-25	E. Hyderman	Discussion with N. Levine regarding previous analysis of the Revised Governance Protocol; correspondence with N. Levine and S. Kukulowicz regarding same; review Benson affidavit; Review the Twenty Second report of the Monitor;	1.60
Feb-12-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence request matters in respect of 1 vehicle; obtaining search results in respect of same;	0.10
Feb-12-25	T. Konechny	Attend to drafting BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges as to sale 021 (Brandt), sale 022 (A) (Metro); sale 022 (B) (Metro), sale 033 (Metro), sale 043 (Brandt); attend to filing discharges as to sale 017 (C) and 024;	4.00
Feb-12-25	S. Kukulowicz	Review of issues under the Governance Protocol; telephone attendance with N. Levine regarding various issues;	0.60
Feb-12-25	N. Levine	Work on incorrect VIN issues; review payment issues; correspondence regarding discharge timing and next steps;	1.30
Feb-13-25	T. Li	Review and revise lien release protocol; working group correspondence regarding ongoing due diligence and search matters; review, revise reporting and analysis in respect of incorrect VIN claims and incorporate additional comments and due diligence results received; review of draft PPSA discharges and attending to other security and lien release matters;	5.00
Feb-13-25	J. Noel	Review draft PPSA discharges regarding lien releases;	1.30

Date	Name	Description	Hours
Feb-13-25	E. Curtis	discussions with S. Rothery and T. Li regarding lien releases; Reviewing memorandum and the Omnibus Direction; reviewing collateral management order;	1.50
Feb-13-25	J. Trinh	Attending to Ministry of Transport searches in respect of 9 VINs;	0.50
Feb-13-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review draft PPSA discharges; revise memorandum regarding lien release procedure; save PMSI notice delivery confirmation from Canada Post to file; instruct clerk to order PPSA searches; correspondence with client regarding third-party liens on Pride vehicles;	5.30
Feb-13-25	H. Dylewski	Receiving and reviewing instructions; preparing draft ON, NL, NB, NS and PE financing change statements relating to Sales 033 and 043; attending to the registration of financing statements relating to Sale 021; receiving confirmation and verification statements; correspondence with working group with respect to same;	3.30
Feb-13-25	J. Jackson	Receive and review updated section E on caselines (manager / court appointed office documents) to monitor status of proceeding; and review confidentiality screen memorandum;	0.30
Feb-13-25	M. Clarkson-Maciel	Consider amendments to schedule B to order for discharge purposes;	0.30
Feb-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence request matters in respect of 1 vehicle; conducting searches in respect of same;	0.60
Feb-13-25	T. Konechny	Attend to filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges as to sale 021 (Brandt);	0.30
Feb-13-25	N. Levine	Calls with client regarding diligence; confer with Cassels team regarding searches; work on pick up issues;	0.90
Feb-13-25	S. Kukulowicz	Exchanged emails regarding RBC/HSBC issue; review of further emails regarding interim distribution to the Agent;	0.70
Feb-14-25	J. Noel	Review draft PPSA discharges regarding lien releases; review PPSA search results regarding lien releases; discussions with S. Rothery, T. Li and E. Curtis regarding lien release protocol;	2.40
Feb-14-25	E. Curtis	Internal meeting to discuss division of outstanding PPSA reviews and Schedules requiring discharge; initial meeting to discuss instructions; PPSA review of Schedule 25 (velocity); ordering draft PPSA discharge regarding Schedule 25 (velocity);	4.90
Feb-14-25	C. Potter	Matters regarding discharges and correspondence regarding the same;	0.30
Feb-14-25	J. Trinh	Attending to Ministry of Transport search in respect of VIN;	0.20
Feb-14-25	T. Li	Working group discussion in respect of lien release protocol	4.80

Date	Name	Description	Hours
		and status of current due diligence for open sale matters; review of PPSA registrations and draft discharges; call with client in respect of analysis pertaining to incorrect VINs; review and revise summary accordingly; coordinate supplemental due diligence searches in respect of additional incorrect VINs allocated to certain dealers and begin review of same; attending to other lien release and security matters;	
Feb-14-25	M. Clarkson-Maciel	Consider monitor documentation in preparation to hearing on 19 February;	0.70
Feb-14-25	E. Hyderman	Review correspondence from counsel to the RBC Bilat, counsel to the Monitor, and the Manager regarding PGL distribution to the manager;	0.10
Feb-14-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; order and review PPSA searches; order and review draft PPSA discharges; correspondence with client regarding lien discharges; instruct E. Curtis on lien release procedure;	4.00
Feb-14-25	A. Slota	Attending to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence request matters in respect of 1 vehicle; obtaining and reviewing balance of all search results in respect of same;	0.30
Feb-14-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Saskatchewan PPSA VIN due diligence request matters in respect of 1 vehicle; conducting, obtaining and reviewing initial search results, further to same;	0.30
Feb-14-25	T. Konechny	Attend to filing PPSA partial discharges for sale 043 (Brandt); attend to drafting PPSA partial discharges and discharges for sale 046 (Brandt), sale 031 (Velocity); special request 013, sale 027 (Velocity); sale 025 (Velocity);	3.50
Feb-14-25	N. Levine	Call with client regarding disputed VIN research; confer with client regarding hearing; review materials; correspondence regarding MCVs	1.10
Feb-14-25	S. Kukulowicz	Review of further emails regarding interim distribution;	0.30
Feb-14-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Manitoba PPSA VIN due diligence request matters in respect of 1 vehicle; conducting, obtaining and reviewing initial search results, further to same;	0.30
Feb-16-25	E. Curtis	Updating internal tracker in regard to outstanding discharges in regards to date of discharge;	0.50
Feb-16-25	S. Kukulowicz	Review of factum of the Applicants;	0.40
Feb-17-25	E. Curtis	Reviewing schedule 25 (velocity) discharges;	1.10
Feb-17-25	E. Hyderman	Review applicants factum and proposed PGL Distributions Order in connection with the February 19, 2025 motion;	0.40
Feb-17-25	S. Kukulowicz	Review of court materials;	0.60
Feb-18-25	J. Noel	Discuss lien releases and dealer sales with S. Rothery, T. Li, and E. Curtis;	0.50

Date	Name	Description	Hours
Feb-18-25	E. Curtis	Reviewing draft discharges for Sale 025; reviewing bring-down searches in regards to Sale 025; updating the current sale notice summary;	1.60
Feb-18-25	N. Levine	Review motion materials in preparation for court; call with client regarding next steps; correspondence regarding pick ups; address discharge issues;	1.40
Feb-18-25	T. Li	Correspondence with working group in respect of ongoing lien discharges and open due diligence searches; review of draft lien discharges and due diligence searches in respect of certain vehicles; revise lien release protocol in respect of bring-down due diligence searches and consider implications of incoming financier's liens; review of vesting and collateral management orders regarding same; attending to other lien release and security matters;	3.20
Feb-18-25	E. Hyderman	Review Applicants revised Deferred Payments and Ancillary Relief Order; review factum of the Administrative Agent;	0.60
Feb-18-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft PPSA discharges; discussion with client regarding third-party liens on certain Pride vehicles sold by dealer;	4.60
Feb-18-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence request matters in respect of 1 vehicle; conducting, obtaining and reviewing search results, in respect of same;	0.90
Feb-18-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request in respect of 16 vehicles; obtaining copies of corporate documents; reviewing initial search results with respect to same;	1.60
Feb-18-25	A. Slota	Attending to ongoing Ontario and Manitoba PPSA VIN due diligence request matters in respect of 1 vehicle; obtaining balance of all search results, in respect of same;	0.30
Feb-18-25	T. Konechny	Attend to filing discharges and partial discharges with respect to sale 032 (Metro); conduct post ON VIN PPSA searches;	1.50
Feb-18-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence request matters in respect of 1 vehicle; conducting, obtaining and reviewing search results, in respect of same;	0.90
Feb-18-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence request matters in respect of 1 vehicle; conducting, obtaining and reviewing search results, in respect of same;	0.60
Feb-18-25	A. Slota	Attending to ongoing Ontario and Saskatchewan PPSA VIN due diligence request matters in respect of 1 vehicle; obtaining balance of all search results, in respect of same;	0.30
Feb-18-25	S. Kukulowicz	Review of updated order from counsel for the Applicants; review of responding court materials from the Agent for the	1.60

Date	Name	Description	Hours
Feb-19-25	J. Noel	Syndicate, Daimler, PACCAR Financial and RBC Bilat; Discussions with S. Rothery, T. Li and E. Curtis regarding lien releases;	0.30
Feb-19-25	E. Curtis	Review of PPSA discharges and bringdown searches regarding Sale 046; reviewing PPSA discharges and bringdown searches regarding Sale 027; reviewing PPSA discharges and bringdown searches regarding Sale 031;	3.70
Feb-19-25	J. Trinh	Receiving and reviewing PPSA verification statement (Sale 043);	0.10
Feb-19-25	T. Li	Correspondence with client in respect of certain lien release requests and results of bring-down due diligence; call with client in respect of potential incoming financier's liens and potential treatment of same; draft and revise lien summary in respect of additional VIN-specific due diligence requests; correspondence with clerks regarding updated search parameters and process; review of lien discharges and due diligence searches against additional vehicles; review of vesting order; attending to other lien release and security matters;	3.30
Feb-19-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft PPSA discharges;	3.10
Feb-19-25	T. Konechny	Attend to matters relating to sale 032 discharges; revision of draft partial discharges as to sales 009 and 019; filing partial discharges and discharges as to sale 046;	2.00
Feb-19-25	J. Fleisher	Discussion with T. Li regarding Northpoint discharges;	0.40
Feb-19-25	S. Kukulowicz	Office conference with N. Levine; review of the Second Supplement to the 21st Report; review of Mitsubishi motion record to lift the stay; review of proposed "Deferred Payments and Ancillary Relief Order"; attended hearing; office conference with N. Levine;	2.40
Feb-19-25	N. Levine	Monitor hearing; prepare for same; discussions with client regarding submissions and potential implications for CM matters; discuss same with S. Kukulowicz;	3.30
Feb-19-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 6 vehicles; obtaining copies of corporate documents; reviewing initial search results with respect to same;	0.50
Feb-19-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 vehicle; conducting searches in respect of same;	0.20
Feb-19-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 16 vehicles; obtaining copies of corporate documents; reviewing balance of all search results and preparing summary report with respect to same;	1.00
Feb-19-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 8 vehicles; obtaining copies of corporate documents;	0.70

Date	Name	Description	Hours
Feb-20-25	J. Noel	reviewing initial search results with respect to same; Review draft PPSA discharges regarding lien releases; discussions with T. Li, S. Rothery and E. Curtis regarding lien releases;	1.50
Feb-20-25	J. Trinh	Attending to MTO VIN searches and providing report with respect to same;	0.60
Feb-20-25	T. Li	Review of due diligence searches in respect of certain VINs and update summary of same; coordinate additional lien releases and review of draft discharges; draft and report to client in respect of title matters; correspondence with clerks in respect of deficient search results and remediation of same; review of vesting order and discussion with working group regarding treatment of incoming financier's liens moving forward; correspondence with client regarding other sale and security matters;	3.80
Feb-20-25	E. Curtis	Pulling additional contact information in connection with BR0003; pull MTO searches in regards to Special Request 014; reviewing PPSA discharges sale 031; reviewing PPSA discharges for sale 027;	3.50
Feb-20-25	N. Levine	Call with client; correspondence regarding discharges; comment on email agreement; address pick up issues	0.70
Feb-20-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft PPSA discharges;	1.70
Feb-20-25	T. Konechny	Attend to filing PPSA discharges and partial discharges in respect of sale 025, sale 027, special request 013; sale 031;	1.50
Feb-20-25	S. Kukulowicz	Review of emails regarding VIN removal issues;	0.20
Feb-20-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 8 vehicles; obtaining copies of corporate documents; reviewing balance of all search results with respect to same;	0.90
Feb-20-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 6 vehicles; obtaining copies of corporate documents; reviewing balance of all search results with respect to same;	0.70
Feb-20-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 vehicle; obtaining search results further thereto;	0.20
Feb-21-25	J. Noel	Review draft PPSA discharges regarding lien releases; discussions with T. Li, S. Rothery and E. Curtis regarding lien releases;	1.80
Feb-21-25	T. Li	Calls with client in respect of lien discharge protocol and upcoming sales; discussions with working group in respect of Ministry discharge timelines and open lien discharge requests / sales; review and revise lien discharge protocol and review of draft lien discharges; review of additional MTO searches in respect of certain motor vehicle collateral and summarize same; attending to other lien discharge and	2.10

Date	Name	Description	Hours
		security matters;	
Feb-21-25	E. Curtis	Review draft discharges regarding PPSA Sale 019; reviewing draft discharges regarding PPSA sale 017(D);	3.10
Feb-21-25	H. Dylewski	Receiving and reviewing instructions; attending to the registration of financing statements relating to Sale 019 and 017(D); receiving confirmation and verification statements of same; receiving and reviewing Ontario verification statements; correspondence with working group with respect to same;	1.70
Feb-21-25	E. Hyderman	Review Cooperation Agreement regarding Corporate Vehicles;	0.20
Feb-21-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft PPSA discharges;	0.70
Feb-21-25	T. Konechny	Attend to filing Alberta, BC, Saskatchewan and Manitoba PPSA partial discharges as to sale 019 and sale 017(D);	0.80
Feb-21-25	S. Kukulowicz	Review of update regarding personal use vehicles;	0.20
Feb-21-25	N. Levine	Call with client regarding pick ups; consider corporate car issues; assist with lien resolutions;	0.30
Feb-21-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of 4 vehicles; obtaining copies of corporate documents; reviewing initial search results with respect to same;	0.80
Feb-22-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft PPSA discharges;	0.50
Feb-24-25	J. Noel	Discussions with T. Li, S. Rothery and E. Curtis regarding lien releases; correspond with A&M regarding third-party liens;	1.00
Feb-24-25	C. Potter	Matters regarding discharges and status items; correspondence regarding the same; matters regarding Pillar discharge and correspondence regarding the same;	1.20
Feb-24-25	T. Li	Calls with working group in respect of open due diligence and sale requests; review of due diligence search results in respect of certain vehicles; review of draft reporting in respect of certain third-party liens; discussion regarding lien release protocol with C. Potter; review of Quebec and repossession documents received to date and correspondence with client regarding same; attending to other lien release and security matters;	2.00
Feb-24-25	E. Curtis	Reviewing draft discharges for Sale 022(A); reviewing draft discharges for Sale 022(B);	4.80
Feb-24-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft PPSA discharges; correspondence with client regarding lien discharges;	1.30
Feb-24-25	N. Levine	Confer with client regarding liens; confer with Cassels team	0.70

Date	Name	Description	Hours
Feb-24-25	A. Slota	regarding same; address ITC issues; Attending to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of 4 vehicles; obtaining copies of corporate documents; reviewing balance of all search results with respect to same;	0.80
Feb-25-25	J. Noel	Discussions with T. Li, S. Rothery and E. Curtis regarding lien releases; review potential sale notices;	0.50
Feb-25-25	T. Li	Correspondence with client in respect of additional due diligence requests and coordination of same with E. Curtis; review of due diligence search results; review and revise draft reporting to client in respect of repossession due diligence received to date; coordinating other lien search and PPSA matters;	1.20
Feb-25-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft PPSA discharges;	1.70
Feb-25-25	E. Curtis	Reviewing draft discharges in connection with Metro Sale 033; reviewing draft discharges for Sale 022(B); reviewing draft discharges in connection with Metro Sale 022(A);	3.50
Feb-25-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of 1 vehicle; conducting searches in respect of same;	0.10
Feb-25-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of 8 vehicles; obtaining copies of corporate documents; reviewing initial search results with respect to same;	0.80
Feb-25-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of 4 vehicles; obtaining copies of corporate documents; reviewing initial search results with respect to same;	0.40
Feb-25-25	S. Kukulowicz	Telephone attendance with N. Levine regarding status;	0.20
Feb-26-25	J. Noel	Discussions with T. Li regarding lien releases;	0.20
Feb-26-25	T. Li	Review and index additional documents for purposes of discharge and correspondence with working group regarding same; consider implications of same and discussion with S. Rothery regarding lien discharge protocol; review of additional due diligence searches received in respect of ongoing sales and reporting on same;	3.00
Feb-26-25	E. Curtis	Review PPSA searches for potential sale notices in regards to Sale 026, 28, 29, 30 and 34;	4.20
Feb-26-25	H. Dylewski	Receiving and reviewing instructions; preparing draft ON, NL, NB, NS and PE financing change statements relating to Sale 022(B), Sales 026 and 028;	1.00
Feb-26-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft PPSA discharges;	0.70
Feb-26-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search	0.80

Date	Name	Description	Hours
		request matters in respect of 8 vehicles; obtaining copies of corporate documents; reviewing balance of all search results with respect to same;	
Feb-26-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of 3 vehicles; obtaining copies of corporate documents; reviewing initial search results with respect to same;	0.40
Feb-26-25	T. Konechny	Attend to drafting BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges for sale 022 (B), sale 026, sale 028, and sale 029;	1.50
Feb-26-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 4 vehicles; obtaining copies of corporate documents; reviewing balance of all search results with respect to same;	0.40
Feb-26-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 vehicle; conducting searches in respect of same;	0.20
Feb-26-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 vehicle; obtaining and reviewing search results in respect of same;	0.20
Feb-26-25	N. Levine	Correspondence regarding titling issues; prepare for call regarding same; confer with lender counsel;	0.50
Feb-27-25	J. Noel	Discussions with T. Li, S. Rothery and E. Curtis regarding lien releases; review potential sale notices; draft email regarding third-party liens;	1.80
Feb-27-25	C. Potter	Matters regarding PPSA discharges and correspondence regarding the same; call with A&M regarding discharge of registration; review of email with respect to the same;	1.20
Feb-27-25	T. Li	Discussions with working group and client in respect of incoming financiers' liens and response to Northpoint correspondence; draft same and incorporate additional comments received from N. Levine and C. Potter; call with client and counsel to other creditor group in respect of titling, leasing and due diligence matters; review of updated court orders in respect of lien discharge matters, the effect of the vesting order (and any exceptions thereto) and broad scope of authority afforded to Manager in respect of discharging liens upon the sales of Pride assets; discussions with J. Noel and S. Rothery in respect of lien discharge protocol and proposed treatment of liens of incoming financiers; review of certain lien discharges to date; attending to other security and due diligence matters;	4.30
Feb-27-25	H. Dylewski	Receiving and reviewing instructions; preparing draft ON, NL, NB, NS and PE financing change statements relating to Sale 029 and 040;	0.90
Feb-27-25	E. Curtis	Reviewing Sale 040; reviewing special request 015; reviewing sale 029(A); reviewing potential sale notices 056	4.00

Date	Name	Description	Hours
Feb-27-25	S. Rothery	and 057; Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft PPSA discharges; instruct law clerks to order PPSA searches; correspondence with client regarding PPSA registrations in respect of incoming financiers; correspondence with client regarding liens to be discharged;	4.60
Feb-27-25	T. Konechny	Attend to drafting BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges for sale 040;	0.40
Feb-27-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 3 vehicles; obtaining copies of corporate documents; reviewing balance of all search results with respect to same;	0.40
Feb-27-25	N. Levine	Address lien release issues; calls with client regarding wind up plan; follow up on Order issues; mark up agreement; call with other lenders regarding title issues;	1.70
Feb-27-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 vehicle; obtaining and reviewing search results in respect of same;	0.20
Feb-27-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of 1 vehicle; conducting searches in respect of same;	0.20
Feb-28-25	J. Noel	Discussions with T. Li, S. Rothery and E. Curtis regarding lien releases;	0.20
Feb-28-25	T. Li	Review and revise draft correspondence to incoming financier in respect of lien discharge mechanisms and correspondence with working group regarding same; attending to lien discharge matters;	0.50
Feb-28-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches and draft PPSA discharges;	1.20
Feb-28-25	H. Dylewski	Attending to the registration of financing statements relating to Sale 040; receiving confirmations and verification statements; receiving and reviewing verification statements; receiving comments and revising drafts relating to Sale 029(A) and (B);	0.90
Feb-28-25	M. Clarkson-Maciel	Consider endorsement and signed order; review applicants' motion documents;	0.40
Feb-28-25	E. Curtis	Reviewing potential sale notice 058; reviewing draft discharges for sale 029(A); reviewing updated Omnibus certificate; reviewing potential sale notice 057;	2.20
Feb-28-25	E. Hyderman	Reviewing February 28 Endorsement;	0.30
Feb-28-25	A. Slota	Attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 vehicle; conducting, obtaining and reviewing initial search results in respect of same;	0.60

Date	Name	Description	Hours
Feb-28-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of 8 vehicles; conducting, obtaining and reviewing search results in respect of same;	1.60
Feb-28-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 vehicle; conducting searches in respect of same;	0.20
Feb-28-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 vehicle; obtaining and reviewing search results in respect of same;	0.20
Feb-28-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of 2 vehicles; conducting, obtaining and reviewing search results in respect of same;	0.40
Feb-28-25	T. Konechny	Attend to filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges as to sale 040; revising drafts for sale 029 (A) and (B);	0.50
Feb-28-25	S. Kukulowicz	Review of Court endorsement regarding DIP terms and approval of Monitor conduct; telephone attendance with N. Levine;	0.60
Feb-28-25	N. Levine	Comment on email; review decision; correspond with client regarding lien issues;	0.50

FEE SUMMARY				
Name	Title	Hours	Rate	Amount
Clarkson-Maciel, Matteo	Business Advisor	19.90	700.00	13,930.00
Geary, Nicola	Partner	1.00	975.00	975.00
Levine, Natalie	Partner	25.30	1,025.00	25,932.50
Potter, Carla	Partner	3.90	840.00	3,276.00
Fleisher, Jonathan	Partner	1.70	1,190.00	2,023.00
Kukulowicz, Shayne	Partner	16.60	1,650.00	27,390.00
Noel, J'Davia	Associate	25.50	525.00	13,387.50
Li, Timon	Associate	59.80	550.00	32,890.00
Curtis, Erin	Associate	39.10	500.00	19,550.00
Rothery, Shae	Associate	53.70	500.00	26,850.00
Jackson, Joshua	Associate	19.90	625.00	12,437.50
Hyderman, Eva	Associate	8.90	500.00	4,450.00
Trinh, Julia	Law Clerk / Paralegal	1.90	500.00	950.00
Dylewski, Hannah	Law Clerk / Paralegal	20.70	400.00	8,280.00
Slota, Alex	Law Clerk / Paralegal	39.10	450.00	17,595.00
Konechny, Tiffany	Law Clerk / Paralegal	20.10	450.00	9,045.00
TOTAL (CAD)		357.10		218,961.50

Our Fees	218,961.50	
Less Discount	(21,896.15)	
Total Fees	197,065.35	
HST @ 13.00%	25,618.49	
TOTAL FEES & TAXES (CAD)		222,683.84

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

Driver's License Searches	417.00
Electronic Due Diligence	2,437.50
PPSA - Registration/Applic./Discharges	1,457.20
Govt of Alberta Pers Prop Regi	3.00
BC Online - PPSA Search/Registrations	241.50
Corporate Filings	252.00
Total Non-Taxable Disbursements	4,808.20

Taxable Disbursements

Electronic Due Diligence	4,230.00
PPSA - Registration/Applic./Discharges	7,515.20
Delivery	50.63
Agency Fees and Disbursements	2,089.00
Total Taxable Disbursements	13,884.83
HST @ 13.00%	1,805.03
Total Taxable Disbursements & Taxes	15,689.86

TOTAL DISBURSEMENTS & TAXES (CAD)	20,498.06
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TOTAL FEES	197,065.35
TOTAL DISBURSEMENTS	18,693.03
TOTAL TAXES	27,423.52
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	243,181.90



Attn: Douglas McIntosh
Alvarez & Marsal Canada Inc., in its capacity as
Court-Appointed Manager over certain property of
TPine Leasing Capital Corporation et al.
200 Bay Street, Suite 3501
Royal Bank Plaza, South Tower
Toronto, ON M5J 2J1

Invoice No: 2282532
Date: May 26, 2025
Matter No.: 059366-00005
GST/HST No.: R121379572

Lawyer: Kukulowicz, Shayne
Tel.: (416) 860-6463
E-mail: SKukulowicz@cassels.com

Re: Court-appointment as Manager of certain assets of the Pride Group

Fees for professional services rendered up to and including March 31, 2025

Our Fees	197,951.50
Less Discount	(19,795.15)
Total Fees	178,156.35
Disbursements	34,214.50
Total Fees and Disbursements	212,370.85
HST @ 13.00%	26,354.53
TOTAL DUE (CAD)	238,725.38

We are committed to protecting the environment.

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44 King St. West,
Toronto, ON, M5H 1H1

Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

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FEE DETAIL			
Date	Name	Description	Hours
Mar-03-25	T. Li	Review of various amended orders and consider implications of same in respect of lien discharge protocol and reporting obligations to client; discussions with working group in respect of same; review of ongoing lien discharge due diligence;	1.70
Mar-03-25	C. Potter	Matters regarding discharges and related matters; correspondence regarding the same;	0.50
Mar-03-25	N. Levine	Respond to inquiries regarding lien claim process; comment on agreement; correspondence with US counsel; review DIP issues;	0.90
Mar-03-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; instruct clerk to prepare revised draft PPSA discharges; review PPSA searches and draft PPSA discharges; correspondence with client regarding liens filed by potential incoming financiers of Pride vehicles to be sold; correspondence with client regarding discharged liens; correspondence with client regarding potential sale of Pride vehicles;	3.00
Mar-03-25	H. Dylewski	Receiving comments and revising draft financing statements relating to Sale 018; attending to the registration of financing statements relating to Sale 029(A); receiving confirmation and verification statements of same; receiving and reviewing Ontario verification statement; correspondence with working group with respect to same; preparing draft ON, NL, NB, NS and PE financing change statements relating to Sale 037;	1.20
Mar-03-25	E. Curtis	Updating tracker if new sale and potential sale notices; reviewing draft discharges for Sale 029(a); reviewing bringdown searches for Sale 029(a); Reviewing Sale 009 draft discharges; corresponding verification statements for sale 040; reviewing PPSA searches and ordering draft discharges in regards to Sale 037; reviewing PPSA searches and ordering draft discharges in regards to Sale 038; reviewing draft discharges in regards to Sale 037;	3.60
Mar-03-25	J. Noel	Discussions with T. Li, S. Rothery and E. Curtis regarding lien releases; review potential sale notices;	0.40
Mar-03-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results in respect of same;	0.20
Mar-03-25	A. Slota	Attending to Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; conducting searches results in respect of same;	0.30
Mar-03-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches results in respect of same;	0.20
Mar-03-25	T. Konechny	Attend to revision of draft partial discharges with respect to	1.50

Date	Name	Description	Hours
		sale 018; filing Alberta, BC, Manitoba and Saskatchewan PPSA partial discharges as to sale 029(A); drafting Alberta, BC, Manitoba and Saskatchewan partial discharges as to sale 037; drafting partial discharges as to sale 038;	
Mar-03-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches results in respect of same;	0.20
Mar-03-25	A. Slota	Attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; conducting searches results in respect of same;	0.30
Mar-03-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results in respect of same;	0.30
Mar-03-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches results in respect of same;	0.20
Mar-03-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches results in respect of same;	0.20
Mar-04-25	T. Li	Review of sale notices and due diligence materials in respect of ongoing vehicle sales; review of various revised orders; correspondence with working group regarding same;	1.50
Mar-04-25	N. Levine	Comment on agreement; call with client; correspond with lenders and consider open issues; correspondence regarding lien issues; discuss titling issues with client and company;	1.10
Mar-04-25	C. Potter	Attending to matters regarding PPSA discharge requests and review of correspondence regarding the same;	0.30
Mar-04-25	M. Clarkson-Maciel	Drafting amendments to Pilkinton consulting agreement following comments from local counsel;	0.40
Mar-04-25	E. Curtis	Reviewing sale discharges for Sale 037; reviewing sale discharges for sale 038; reviewing bringdown searches for 009, 037 and 038;	2.30
Mar-04-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches and draft PPSA discharges; correspondence with client regarding potential sale of certain Pride vehicles; discussion with B. Wei regarding potential sale of certain Pride vehicles;	1.80
Mar-04-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results in respect of same;	0.30
Mar-04-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results in respect of same;	0.20
Mar-04-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search	0.20

Date	Name	Description	Hours
		request matters in respect of one VIN; obtaining and reviewing search results in respect of same;	
Mar-04-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of four VINs; conducting searches in respect of same;	0.80
Mar-04-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing all search results in respect of same;	0.20
Mar-04-25	A. Slota	Attending to ongoing Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results in respect of same;	0.30
Mar-04-25	A. Slota	Attending to Alberta PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing search results in respect of same;	0.80
Mar-04-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results in respect of same;	0.20
Mar-05-25	C. Potter	Matters regarding discharges and related items; review correspondence regarding VIN discharges;	0.50
Mar-05-25	N. Levine	Call with lenders' counsel; consider titling issues; draft email to company counsel regarding same; call with client regarding outstanding documents; respond to client questions regarding same;	0.70
Mar-05-25	H. Dylewski	Receiving comments and revising draft financing statements relating to Sale 018;	0.70
Mar-05-25	M. Clarkson-Maciel	Analysis regarding [REDACTED]; conference with N. Levine;	0.60
Mar-05-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealer;	1.00
Mar-05-25	E. Curtis	Ordering searches for sale 064, 065, 066, 065, 067, 068;	1.70
Mar-05-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of two VINs; conducting searches in respect of same;	0.20
Mar-05-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of four VINs; obtaining and reviewing all search results, pursuant to same;	0.40
Mar-05-25	A. Slota	Attending to Ontario, British Columbia, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of twelve VINs; conducting searches in respect of same; obtaining and reviewing initial search results;	2.00
Mar-05-25	A. Slota	Attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; conducting searches in respect of same; obtaining and reviewing initial	0.20

Date	Name	Description	Hours
Mar-05-25	T. Konechny	search results; Attend to drafting Alberta, BC, Saskatchewan and Manitoba PPSA partial discharges as to sale 018 (A) and (B);	0.40
Mar-06-25	N. Levine	Address titling issues; confer with company counsel and client regarding missing documents; comment on tax retention agreement; correspondence with company counsel regarding missing VINs and turn over details; discuss same with client;	1.20
Mar-06-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review draft PPSA discharges; correspondence with client regarding nil PPSA results in respect of certain Pride vehicles;	1.60
Mar-06-25	H. Dylewski	Receiving and reviewing instructions; attending to the registration of financing statements relating to Sale 009 and Sale 037; receiving confirmation and verification statements of same; receiving and reviewing Ontario verification statements; correspondence with working group with respect to same;	1.00
Mar-06-25	J. Noel	Discussions with T. Li, S. Rothery and E. Curtis regarding lien releases; review draft PPSA discharges regarding lien releases;	1.10
Mar-06-25	E. Curtis	Reviewing draft discharges regarding Sale 027, 009, 037 and 038; instructing clerks to file discharges regarding Sale 027, 009, 037 and 038;	4.20
Mar-06-25	A. Slota	Attending to ongoing Ontario, British Columbia, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of twelve VINs; obtaining and reviewing balance of all search results;	1.00
Mar-06-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches in respect of same;	0.20
Mar-06-25	A. Slota	Attending to Ontario, British Columbia and Saskatchewan PPSA VIN due diligence search request matters in respect of three VINs; conducting searches in respect of same; obtaining and reviewing initial search results;	0.50
Mar-06-25	T. Konechny	Attend to filing Alberta, BC, Manitoba and Saskatchewan PPSA partial discharges with respect to sale 009 and sale 037; filing PPSA partial discharges as to sale 038;	1.00
Mar-06-25	A. Slota	Attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; conducting searches in respect of same; obtaining and reviewing initial search results;	0.30
Mar-06-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of five VINs; conducting searches in respect of same;	0.50
Mar-06-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of two VINs; obtaining and	0.20

Date	Name	Description	Hours
Mar-06-25	A. Slota	reviewing search results in respect of same; Attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; conducting searches in respect of same; obtaining and reviewing initial search results;	0.30
Mar-06-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.20
Mar-06-25	A. Slota	Attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of two VINs; conducting searches in respect of same; obtaining and reviewing initial search results;	0.50
Mar-06-25	A. Slota	Attending to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conducting searches in respect of same; obtaining and reviewing initial search results;	0.30
Mar-06-25	A. Slota	Attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; conducting searches in respect of same; obtaining and reviewing initial search results;	0.30
Mar-06-25	M. Clarkson-Maciel	Consideration of analysis regarding Pilkington engagement agreement; correspondence regarding the same; consideration and analysis of effect on manager of lift stay motion by Mitsubishi; numerous correspondence on the same;	0.80
Mar-07-25	J. Trinh	Attending to Ministry of Transportation VIN searches for 15 VINs;	0.70
Mar-07-25	T. Li	Correspondence with J. Noel in respect of MTO title search review and coordination of due diligence searches; review of search results and report by J. Noel to client; correspondence with working group in respect of ongoing due diligence and lien discharge requests; review of additional due diligence searches obtained in respect of vehicles;	2.20
Mar-07-25	S. Kukulowicz	Review of Mitsubishi materials and discussed motion with N. Levine;	0.40
Mar-07-25	N. Levine	Attend hearing; discuss contracts with client; address outstanding pick up issues; confer with Cassels team regarding same; address titling issues;	1.50
Mar-07-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches;	0.40
Mar-07-25	H. Dylewski	Receiving and reviewing Ontario verification statements relating to Sale 038; correspondence with working group with respect to the same;	0.20
Mar-07-25	E. Curtis	Ordering searches and updating tracker regarding sale 063; ordering searches and updating tracker regarding sale 068;	1.80
Mar-07-25	J. Noel	Review and summarize MTO VIN searches;	0.60

Date	Name	Description	Hours
Mar-07-25	M. Clarkson-Maciel	Documentation signing steps for Pilkington consulting agreement;	0.20
Mar-07-25	A. Slota	Attending to Manitoba PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.30
Mar-07-25	A. Slota	Attending to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.30
Mar-07-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.30
Mar-07-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results in respect of same;	0.20
Mar-07-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of five VINs; obtaining and reviewing all search results;	0.50
Mar-07-25	A. Slota	Attending to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.30
Mar-07-25	A. Slota	Attending to ongoing Ontario, British Columbia and Saskatchewan PPSA VIN due diligence search request matters in respect of three VINs; obtaining and reviewing balance of all search results;	0.50
Mar-07-25	A. Slota	Attending to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of two VINs; obtaining and reviewing balance of all search results;	0.50
Mar-07-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.30
Mar-08-25	E. Curtis	Updating master spread sheet and internal tracker regarding outstanding draft discharges;	0.10
Mar-09-25	E. Curtis	Reviewing PPSA summary and PPSA discharges for Sale 18(A); reviewing PPSA summary and PPSA discharges for Sale 53(A); reviewing PPSA discharge and bringdown searches regarding Sale 028; reviewing bringdown searches regarding Sale 053(A);	3.20
Mar-10-25	T. Li	Review of executed Metro undertaking and correspondence with working group regarding same; review of certain third-party and RSLA lien results and correspond with S. Rothery in respect of potential discharge and additional due diligence required; coordinate same with financial services law clerks; attending to other lien discharge matters;	0.90
Mar-10-25	S. Kukulowicz	Telephone attendance with N. Levine regarding issue of 10 trucks that were not released; review of RBC motion regarding receivership of TPine;	1.10

Date	Name	Description	Hours
Mar-10-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of eight VINs; conducting searches;	0.80
Mar-10-25	A. Slota	Attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing initial search results;	0.30
Mar-10-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches;	0.20
Mar-10-25	N. Levine	Draft email to company; prepare for call with client; call with client; review record;	1.20
Mar-10-25	J. Noel	Review potential sale notices;	0.20
Mar-10-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; Instruct clerks to prepare draft PPSA discharges; review draft PPSA discharges; correspondence with client regarding liens in respect of potential incoming financiers to the end-purchasers of Pride vehicles;	3.30
Mar-10-25	H. Dylewski	Preparing draft MB, ON, NL, NB, NS and PE financing change statements relating to Sale 027, 053(A) and Sale 047; attending to the registration of MB financing statement relating to Sale 027; receiving verification statement of same; correspondence with working group with respect to same; receiving comments and revising drafts relating to Sale 016;	2.60
Mar-10-25	E. Curtis	Ordering searches and bringdown searches in regards to sale 069, 055, 18(B),070,071; ordering PPSA discharge drafts regarding sale 047; ordering discharges of sale 027;	4.30
Mar-10-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches;	0.20
Mar-10-25	T. Konechny	Attend to drafting Alberta, BC, Manitoba and Saskatchewan PPSA partial discharges as to sale 047 and sale 053 (A); revising for sale 016;	1.00
Mar-10-25	A. Slota	Attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing initial search results;	0.30
Mar-10-25	A. Slota	Attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing initial search results;	0.30
Mar-10-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of two VINs; conducting searches;	0.30
Mar-10-25	A. Slota	Attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing initial search results;	0.30
Mar-10-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of two VINs; conducting searches;	0.20
Mar-11-25	T. Li	Correspondence with client and working group in respect of open sale transactions, due diligence requests and	3.40

Date	Name	Description	Hours
		coordinate draft discharges regarding same; review of various third-party lien matters and correspondence with S. Rothery in respect of certain potentially legacy third-party liens; follow-up with client regarding same; review of certain third-party and RSLA lien extracts to confirm materiality and quantum of same; prepare internal summary of same for further review; attending to other lien discharge and due diligence matters;	
Mar-11-25	N. Levine	Follow up on letter; call with S. Kukulowicz; revise letter; address lien issues; call with client; confer with team regarding undertakings; continue to revise letter; review motion record; review endorsement;	2.30
Mar-11-25	S. Kukulowicz	Review of draft email and correspondence regarding 10 VINs in dispute; review of endorsement regarding Mitsubishi lift stay motion;	0.80
Mar-11-25	J. Trinh	Reviewing PPSA search in respect of one VIN and providing comments with respect to whether security interest has been discharged;	0.20
Mar-11-25	M. Clarkson-Maciel	Drafting letter related to missing VINs, review of analysis prepared by N. Levine;	1.20
Mar-11-25	H. Dylewski	Receiving and reviewing instructions; attending to the registration of financing statements relating to Sale 018(A); receiving confirmation and verification statements of same; receiving and reviewing Ontario verification statement; correspondence with working group with respect to same;	0.90
Mar-11-25	J. Noel	Review draft PPSA discharges and PPSA bring-down searches regarding lien releases;	2.00
Mar-11-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; Instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealer;	2.30
Mar-11-25	E. Curtis	Reviewing draft discharges regarding Sale 047; reviewing discharges regarding Sale 053(A); review of discharges regarding Metro Sale 033 in connection with undertaking;	5.70
Mar-11-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches, further to same;	0.20
Mar-11-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.10
Mar-11-25	T. Konechny	Attend to filing Alberta, BC, Manitoba and Saskatchewan PPSA partial discharges for sale 018 (A); filing partial discharges for sale 047 and sale 028;	1.20
Mar-11-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.30

Date	Name	Description	Hours
Mar-11-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.30
Mar-11-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of two VINs; obtaining and reviewing search results;	0.20
Mar-11-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.10
Mar-11-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.30
Mar-11-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of twenty-seven VINs; conducting searches;	2.30
Mar-11-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of two VINs; obtaining and reviewing search results;	0.20
Mar-11-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.30
Mar-11-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of eight VINs; obtaining and reviewing search results;	0.80
Mar-12-25	T. Li	Review of Quebec repossession due diligence and discussion with E. Curtis regarding same; correspondence and call with client in respect of third party liens and ongoing sale due diligence; review of supplemental due diligence results in respect of certain Pride entities for purpose of titling / repossession analysis in Quebec; attending to other lien discharge and security matters;	1.80
Mar-12-25	S. Kukulowicz	Review of final correspondence regarding VINs in dispute; office conference with N. Levine regarding various issues; review of the Monitor's 23rd Report;	0.80
Mar-12-25	N. Levine	Prepare for call; correspondence regarding letter; finalize letter; revise letter; call with S. Kukulowicz; call with client; review report; emails regarding titling; review factum;	1.50
Mar-12-25	M. Clarkson-Maciel	Considering letter to Pride entities;	0.20
Mar-12-25	H. Dylewski	Receiving and reviewing instructions; revising draft financing change statements relating to Sale 033; receiving and reviewing Ontario verification statements relating to Sale 028 and 047; preparing draft financing change statements relating to Sale 034; attending to the registration of financing statements; receiving confirmation and verification statements of same; receiving and reviewing Ontario verification statement; correspondence with working group with respect to same;	3.10
Mar-12-25	J. Noel	Review draft PPSA discharges and PPSA bring-down	1.00

Date	Name	Description	Hours
Mar-12-25	S. Rothery	searches regarding lien releases; Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; Instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealers;	2.40
Mar-12-25	E. Curtis	Reviewing searches in Quebec and additional searches in Ontario in regards to special request 012 for the repossession of vehicles in Quebec; drafting email to A&M to update on the status of review;	4.60
Mar-12-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches;	0.20
Mar-12-25	A. Slota	Attending to Ontario corporate due diligence search request matters in respect of Pride Group Logistics Ltd.; obtained and reviewed search results and provided summary report;	0.30
Mar-12-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-12-25	A. Slota	Attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing initial search results;	0.30
Mar-12-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of twenty-seven VINs; obtaining and reviewing all search results;	1.00
Mar-13-25	J. Trinh	Attending to registration of BC PPSA discharges in respect of Sale 033; receiving and reviewing verification of same;	0.20
Mar-13-25	J. Trinh	Revising draft BC PPSA amendment pertaining to Base Reg. No. 986230P and (Sale 016(B)); preparing draft BC PPSA amendment pertaining to Base Reg. No. 986230P and (Sale 016(C));	0.20
Mar-13-25	J. Trinh	Attending to registration of BC PPSA financing statement in respect of Sale 053(A); receiving and reviewing verification of same;	0.20
Mar-13-25	J. Trinh	Attending to Ministry of Transport search in respect of VIN 4V4NC9GH64N359203;	0.20
Mar-13-25	J. Trinh	Preparing draft PPSA discharge financing statements pertaining to Sale 064;	0.80
Mar-13-25	J. Noel	Review draft PPSA discharges and PPSA bring-down searches regarding lien releases; discussions with Cassels team regarding lien release process; review sale notices and potential sale notices; review MTO searches per A&M request; correspond with A&M regarding lien releases and MTO search results;	7.40
Mar-13-25	T. Li	Correspondence and calls with working group in respect of lien discharge protocol and proposed changes to same; draft and send e-mail and summary of CCAA proceedings	4.50

Date	Name	Description	Hours
		and relevant order to Quebec counsel in light of potential Quebec lien discharges; coordinate lien discharges and review of open due diligence and lien discharge requests; coordinate MTO searches and attending to related due diligence summaries; call with C. Potter and N. Levine in respect of certain third-party liens and discussion with E. Curtis regarding resolution of same with relevant secured party; attending to other lien discharge and security matters;	
Mar-13-25	S. Kukulowicz	Telephone attendance with N. Levine regarding status and various issues; review of various motion materials;	0.40
Mar-13-25	C. Potter	Matters regarding discharge of third party lien issue and correspondence regarding third party lien discharge; matters regarding initial discharge of Quebec lien and correspondence regarding the same;	0.90
Mar-13-25	N. Levine	Call with client regarding strategy next steps; address titling and discharge issues; internal call regarding strategy	0.60
Mar-13-25	H. Dylewski	Preparing draft financing change statements relating to Sales 063, 068, 53(A), 17(A), 055 and 030(A); receiving comments and revising draft financing statements relating to Sales 016(B) and (C); attending to the registration of financing statements relating to Sales 53(A), 033 and 068; receiving confirmation and verification statements of same; receiving and reviewing Ontario verification statements; correspondence with working group with respect to same;	8.20
Mar-13-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; Instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealers;	6.40
Mar-13-25	E. Curtis	Reviewing searches and ordering discharges for Sale 063; sale 068; sale 034; sale 30(A);	3.90
Mar-13-25	A. Slota	Attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; conducting searches further to same;	0.20
Mar-13-25	A. Slota	Attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; conducting searches further to same;	0.20
Mar-13-25	A. Slota	Attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; conducting searches further to same;	0.20
Mar-13-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches further to same;	0.20
Mar-13-25	A. Slota	Attending to British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing search results, further to same;	0.20

Date	Name	Description	Hours
Mar-13-25	J. Fleisher	Discussion with T. Li regarding Quebec;	0.60
Mar-13-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches further to same;	0.20
Mar-13-25	A. Slota	Attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; conducting searches further to same;	0.20
Mar-13-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches further to same;	0.20
Mar-13-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of two VINs; conducting searches further to same;	0.30
Mar-13-25	A. Slota	Attending to Alberta PPSA VIN due diligence search request matters in respect of two VINs; conducting, obtaining and reviewing search results;	0.40
Mar-13-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches further to same;	0.20
Mar-13-25	A. Slota	Attending to Ontario, Alberta, British Columbia and Saskatchewan PPSA VIN due diligence search request matters in respect of eight VINs; conducting, obtaining and reviewing initial search results, further to same;	1.10
Mar-13-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results, further to same;	0.30
Mar-13-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches further to same;	0.20
Mar-13-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches further to same;	0.20
Mar-13-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches further to same;	0.20
Mar-13-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of five VINs; conducting searches further to same;	0.50
Mar-13-25	A. Slota	Attending to Manitoba PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing search results;	0.20
Mar-13-25	A. Slota	Attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of five VINs; conducting searches further to same;	0.50
Mar-13-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches further	0.20

Date	Name	Description	Hours
		to same;	
Mar-13-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results, pursuant to same;	0.20
Mar-14-25	J. Noel	Discussions with Cassels team regarding lien release process; review draft PPSA discharges and bring-down searches regarding lien releases; review MTO search results per A&M request; correspond with A&M regarding lien releases and MTO search results;	3.30
Mar-14-25	T. Li	Calls with working group in respect of lien release protocol and discharge process; correspondence with J. Noel in respect of open due diligence workstreams; discussions with E. Curtis in respect of Quebec repossession, due diligence and security matters; review of Quebec materials and correspondence with Quebec agent regarding lien discharge requests; attending to other lien discharge and security matters;	1.50
Mar-14-25	J. Trinh	Preparing draft BC total discharge with respect to base reg. no. 114082Q;	0.20
Mar-14-25	J. Trinh	Attending to Ministry of Transportation searches in respect of 98 VINs; receiving, reviewing and providing report with respect to same;	3.00
Mar-14-25	J. Trinh	Attending to registration of AB PPSA discharge in respect of Sale 017(A); receiving and reviewing verification of same;	0.20
Mar-14-25	J. Trinh	Attending to registration of AB PPSA discharge in respect of Sale 025; receiving and reviewing verification of same;	0.20
Mar-14-25	N. Levine	Call with client; call with team; emails regarding settlement and lien release;	1.00
Mar-14-25	A. Slota	Attending to ongoing Ontario, Alberta, British Columbia and Saskatchewan PPSA VIN due diligence search request matters in respect of eight VINs; obtaining and reviewing balance of all search results, further to same;	0.50
Mar-14-25	H. Dylewski	Reviewing drafts relating to Sale 055; preparing draft ON, NL, NB, NS and PE financing change statements relating to Sale 030(B); attending to the registration of financing statements relating to Sale 033(B) and 053(A); receiving confirmation and verification statements of same;	2.40
Mar-14-25	E. Curtis	Review of non-syndicate draft discharges;	0.10
Mar-14-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; Instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealers;	2.30
Mar-14-25	E. Curtis	Internal meeting to discuss changes to the discharge process; review and meeting to discuss special request 012 in connection with the potential repossession of vehicles in Quebec;	1.10

Date	Name	Description	Hours
Mar-14-25	A. Slota	Attending to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-14-25	A. Slota	Attending to PPSA VIN due diligence search request matters in all provinces, save for Ontario and Quebec, in respect of five VINs; conducting, obtaining and reviewing initial search results;	1.50
Mar-14-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-14-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-14-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of on VIN; obtaining and reviewing search results;	0.20
Mar-14-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-14-25	A. Slota	Attending to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of five VINs; obtaining and reviewing search results;	0.50
Mar-14-25	A. Slota	Attending to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-14-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of five VINs; obtaining and reviewing all search results;	0.50
Mar-14-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-14-25	T. Konechny	Attend to drafting Alberta, BC, Manitoba and Saskatchewan PPSA partial discharges with respect to sale 030(B); filing same; filing partial discharges as to sale 030(A);	1.00
Mar-14-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-14-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-14-25	A. Slota	Attending to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-14-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-14-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search	0.20

Date	Name	Description	Hours
		request matters in respect of one VIN; obtaining search results, further to same;	
Mar-14-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of two VINs; obtaining and reviewing search results, further to same;	0.20
Mar-15-25	J. Noel	Review PPSA search results regarding lien releases;	1.10
Mar-15-25	T. Li	Review of research prepared by Quebec counsel; review of queries from E. Curtis regarding same and correspondence in respect of lien search results and concerns regarding repossession of vehicles;	0.60
Mar-15-25	E. Curtis	Corresponding with Quebec Counsel in regards to Special Request 012; review of corporate reports and prior names in regards to special request 012;	1.50
Mar-16-25	E. Curtis	Extracting Quebec registration for T. Li's review in regards to Special Request 012;	1.20
Mar-17-25	J. Trinh	Attending to registration of PPSA discharges relating to Sale 064; receiving and reviewing confirmation/verification of same;	0.80
Mar-17-25	J. Noel	Review draft PPSA registrations regarding lien releases; review PPSA searches regarding sales and potential sales;	2.00
Mar-17-25	T. Li	Call with client in respect of corporate vehicles; correspondence with Quebec counsel regarding lien discharge and repossession matters; review research in respect of same; correspondence with N. Levine and C. Potter in respect of lien discharge protocol;	1.80
Mar-17-25	N. Levine	Call with A&M r [REDACTED];	0.10
Mar-17-25	H. Dylewski	Receiving and reviewing Ontario verification statements relating to Sale 033, 030(A) and 30(B); attending to the registration of financing statements relating to Sales 063, 016(B) & 055; receiving confirmation and verification statements of same; preparing draft ON, NL, NB, NS and PE financing change statements relating to Sale 041;	3.90
Mar-17-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealers;	6.90
Mar-17-25	E. Curtis	Ordering addition MTO and PPSA searches for special request 012; reviewing 064 discharges;	2.00
Mar-17-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of two VINs; conducting searches;	0.30
Mar-17-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches;	0.20
Mar-17-25	A. Slota	Attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of four VINs; conducting, obtaining and reviewing initial search results;	0.50

Date	Name	Description	Hours
Mar-17-25	J. Fleisher	Review of Quebec counsel e-mail; discuss with T. Li;	0.50
Mar-17-25	T. Konechny	Attend to drafting BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges as to sale 041, 054, and 057; filing partial discharges for sale 016(B);	1.20
Mar-17-25	A. Slota	Attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing initial search results;	0.50
Mar-17-25	A. Slota	Attending to ongoing PPSA VIN due diligence search request matters in all provinces, save for Ontario and Quebec, in respect of five VINs; obtaining and reviewing balance of all search results;	2.50
Mar-18-25	J. Trinh	Preparing draft PPSA discharge financing statements in respect of Sale 051(A);	0.90
Mar-18-25	J. Trinh	Attending to Ministry of Transport searches in respect of Special Request 012 and providing report with respect to same;	0.40
Mar-18-25	J. Trinh	Preparing draft PPSA discharge financing statements in respect of Sale 052;	0.40
Mar-18-25	T. Li	Calls with working group in respect of lien discharge protocol and summarize discharges and due diligence conducted to date; review of MTO searches; discussions with E. Curtis regarding responses to Quebec due diligence queries and correspondence with Quebec counsel regarding same; identify TD registration and correspondence with N. Levine and counsel to TD in respect of non-MCV vehicle with legacy TD registration effected thereon; review of draft discharges and ongoing sale due diligence;	3.10
Mar-18-25	J. Trinh	Discussions with with working group with respect to PPSA registration processes and timing;	0.50
Mar-18-25	S. Kukulowicz	Telephone attendance with N. Levine et al. regarding lien discharge process;	0.20
Mar-18-25	C. Potter	Matters regarding PPSA registrations and discharges; correspondence regarding the same;	0.90
Mar-18-25	N. Levine	Emails regarding title documents; call with client; call with Cassels team; work on lien issues; address lien issues; title issues; call with monitor; research outstanding wind-up issues; work on list of outstanding activities;	1.60
Mar-18-25	H. Dylewski	Continue receiving and reviewing confirmation and verification statements relating to Sale 16(B), 055, Sale 063 and 055; preparing draft ON, NL, NB, NS and PE financing change statements relating to Sales 052, 053(A), 051(A), 061, 057 & 054; receiving comments and revising draft financing change statements relating to Sale 022(B); attending to the registration of financing statements relating to Sale 018(B), 022(B) and 041; receiving confirmation and verification statements of same;	4.40
Mar-18-25	E. Curtis	Review of Sale 018(B); review of draft discharge statements;	3.60

Date	Name	Description	Hours
Mar-18-25	J. Noel	Review draft PPSA registrations regarding vehicle sales;	1.40
Mar-18-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealer; discussion with S. Kukulowicz, N. Levine, and T. Li regarding lien discharge process; instruct law clerks regarding revised lien discharge process;	7.30
Mar-18-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of two VINs; obtaining and reviewing search results;	0.30
Mar-18-25	A. Slota	Attending to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of four VINs; obtaining and reviewing balance of all search results;	0.50
Mar-18-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches;	0.20
Mar-18-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of ten VINs; conducting searches;	1.00
Mar-18-25	T. Konechny	Attend to filing PPSA partial discharges in respect of sale 041;	0.40
Mar-18-25	T. Konechny	Preparing draft PPSA partial discharges in respect of sale 053(A);	0.20
Mar-18-25	T. Konechny	Preparing draft PPSA partial discharges in respect of sale 061;	0.60
Mar-18-25	T. Konechny	Filing PPSA partial discharges in respect of sale 018(B);	0.40
Mar-18-25	J. Fleisher	Internal matters regarding streamlining process to enhance discharge process;	0.70
Mar-18-25	T. Konechny	Attend to filing PPSA partial discharges in respect of sale 022(B);	0.60
Mar-18-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.40
Mar-18-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of five VINs; conducting, obtaining and reviewing search results;	1.00
Mar-18-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-19-25	T. Konechny	Attend to filing PPSA partial discharges in respect of sale 016(A);	0.30
Mar-19-25	J. Trinh	Discussion with working group with respect to new processes;	0.30
Mar-19-25	J. Trinh	Attending to registration of PPSA partial discharges in respect of Sale 052; receiving and reviewing	0.60

Date	Name	Description	Hours
Mar-19-25	J. Trinh	confirmation/verification of same; providing results to client; Attending to registration of PPSA partial discharges in respect of Sale 051(A); receiving and reviewing confirmation/verification of same; providing report to client;	0.70
Mar-19-25	T. Li	Revise and implement changes to lien protocol; calls with working group and financial services law clerks regarding same; review of Quebec regulatory matters and correspondence with Quebec counsel regarding same; review outstanding sale notices and ongoing due diligence; call with counsel to TD in respect of discharged legacy TD lien against particular VIN;	1.60
Mar-19-25	C. Potter	Matters regarding PPSA discharges and related items; correspondence regarding the same;	0.40
Mar-19-25	N. Levine	Prepare for call; call with client; call regarding discharges; call with E. Mann; emails regarding liens;	0.90
Mar-19-25	H. Dylewski	Attending to the registration of financing statements relating to Sale 053(A); receiving verification statements of same; correspondence with working group with respect to same;	0.40
Mar-19-25	H. Dylewski	Attending to the registration of financing statements relating to Sale 061; receiving confirmation and verification statements of same; receiving Ontario verification statements; correspondence with working group with respect to same;	0.70
Mar-19-25	H. Dylewski	Attending to the registration of financing statements relating to Sale 057; receiving confirmation and verification statements of same; receiving Ontario verification statement; correspondence with working group with respect to same;	0.70
Mar-19-25	H. Dylewski	Attending to the registration of financing statements relating to Sale 054; receiving confirmation and verification statements of same; receiving Ontario verification statement; correspondence with working group with respect to same;	0.70
Mar-19-25	H. Dylewski	Receiving comments and revising draft financing change statement; attending to the registration of financing statement; receiving confirmation of same; receiving and reviewing verification statement; correspondence with working group with respect to same;	0.50
Mar-19-25	H. Dylewski	Attending to the registration of financing statements relating to Sale 061; receiving confirmation of same; receiving and reviewing Ontario verification statements; correspondence with working group with respect to same;	0.70
Mar-19-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; instruct clerks	4.60

Date	Name	Description	Hours
		to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealer; instruct law clerks regarding revised lien discharge process;	
Mar-19-25	H. Dylewski	Attending to the registration of financing statements relating to Sale 016(A); receiving confirmation and verification statements of same; receiving Ontario verification statement; correspondence with working group with respect to same;	0.70
Mar-19-25	H. Dylewski	Discussions with working group with respect to RBC lien registration procedure;	0.40
Mar-19-25	H. Dylewski	Receiving and reviewing verification statements relating to Sale 018(B), 022(B) and 041;	0.40
Mar-19-25	E. Curtis	Reviewing draft discharges;	0.60
Mar-19-25	J. Noel	Review draft PPSA discharges regarding vehicle sales; discussions with T. Li, S. Rothery and E. Curtis regarding lien releases;	1.70
Mar-19-25	T. Konechny	Attend to filing non-RBC MB PPSA partial discharges in respect of sale 053(A);	0.20
Mar-19-25	T. Konechny	Attend to filing PPSA partial discharges in respect of sale 061; filing non-RBC MB partial discharge;	0.40
Mar-19-25	T. Konechny	Attend to filing PPSA partial discharges in respect of sale 057;	0.30
Mar-19-25	T. Konechny	Attend to filing PPSA partial discharges in respect of sale 054;	0.30
Mar-19-25	J. Fleisher	Quebec POA matters;	0.20
Mar-19-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of ten VINs; obtaining and reviewing all search results;	1.00
Mar-19-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-19-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches;	0.20
Mar-19-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of five VINs; conducting searches;	0.50
Mar-19-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches;	0.20
Mar-20-25	J. Trinh	Receiving instructions with respect to Sale 071; preparing draft PPSA discharge financing statements and attending to registration of same; receiving and reviewing PPSA discharge verification/confirmation statements; report to client with respect to same;	1.00
Mar-20-25	S. Kukulowicz	Review of notice of appeal filed by the Syndicate;	0.20
Mar-20-25	C. Potter	Attending to PPSA discharge and related matters;	0.40
Mar-20-25	N. Levine	Review motion record; review notice of appeal;	0.40

Date	Name	Description	Hours
Mar-20-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; Instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealer; discussion with client regarding Pride Entity discharges for Sale BR0016;	2.10
Mar-20-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of five VINs; obtaining and reviewing search results;	0.50
Mar-20-25	E. Curtis	Reviewing and discharging sale 018(B); drafting comments to A&M regarding the potential repossession of vehicle; reviewing and discharging sale 041; internal meeting to discuss ongoing pride matters;	4.80
Mar-20-25	J. Noel	Correspond with A&M regarding potential sale;	0.20
Mar-20-25	A. Slota	Attending to PPSA VIN due diligence search request matters in all provinces, save for Quebec, in respect of three VINs; conducting, obtaining and reviewing search results;	2.00
Mar-20-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.10
Mar-20-25	A. Slota	Attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing initial search results;	0.40
Mar-20-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing search results;	0.20
Mar-20-25	A. Slota	Attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing initial search results;	0.40
Mar-20-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.10
Mar-20-25	A. Slota	Attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of two VINs; conducting, obtaining and reviewing search results;	0.50
Mar-21-25	J. Trinh	Providing comments with respect to SK VIN search set up;	0.20
Mar-21-25	J. Noel	Review and summarize PPSA search results per A&M request;	1.50
Mar-21-25	T. Li	Correspondence with Quebec counsel in respect of lien discharge matters and power of attorney; discussions with J. Fleisher and N. Levine regardnig same; review of power of attorney;	0.50
Mar-21-25	N. Levine	Review variance and lien issues;	0.70
Mar-21-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches, further	0.20

Date	Name	Description	Hours
		to same;	
Mar-21-25	A. Slota	Attending to Nova Scotia PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing search results;	0.20
Mar-21-25	C. Potter	Matters regarding PPSA discharges and related matters; correspondence regarding the same;	0.30
Mar-21-25	E. Curtis	Reviewing draft discharges and bringdown searches;	0.40
Mar-21-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; Instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealer;	1.00
Mar-21-25	E. Hyderman	Reviewing motion record of bilateral lender;	0.40
Mar-21-25	J. Fleisher	Quebec POA and questions from client and e-mail to Quebec lawyer; review of POA;	0.40
Mar-21-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 044;	0.60
Mar-21-25	A. Slota	Attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of two VINs; conducting, obtaining and reviewing initial search results;	0.30
Mar-21-25	A. Slota	Attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing initial search results;	0.20
Mar-21-25	A. Slota	Attending to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.30
Mar-21-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches, further to same;	0.20
Mar-21-25	A. Slota	Attending to Nova Scotia PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing search results;	0.20
Mar-21-25	A. Slota	Attending to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.30
Mar-21-25	A. Slota	Attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing initial search results;	0.20
Mar-21-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.30
Mar-24-25	T. Li	Review of Quebec power of attorney; review of searches;	0.40
Mar-24-25	N. Levine	Draft email to client; call with client; review report; correspond with company counsel;	0.90

Date	Name	Description	Hours
Mar-24-25	S. Kukulowicz	Review of Pride motion record returnable March 27, 2025 for various relief;	0.50
Mar-24-25	J. Trinh	Preparing draft NS PPSA partial discharge with respect to sale 017(b); attending to registration of same; receiving PPSA verification statement;	0.20
Mar-24-25	J. Noel	Review draft PPSA discharges regarding non-RBC lien releases;	0.50
Mar-24-25	H. Dylewski	Preparing draft NS financing change statement relating to Sale 004; attending to the registration of financing statement; receiving verification statement of same; correspondence with working group with respect to same;	0.40
Mar-24-25	E. Curtis	Reviewing additional search for Sale 017(B) in NS to identify additional liens; review of sale 004 discharge; review of 17(B) draft discharge;	0.50
Mar-24-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealer;	2.20
Mar-24-25	T. Konechny	Preparing and filing PPSA partial discharges in respect of sale 007(A);	1.20
Mar-24-25	A. Slota	Attending to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.30
Mar-24-25	A. Slota	Attending to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of two VINs; obtaining and reviewing balance of all search results;	0.50
Mar-24-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-24-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-24-25	A. Slota	Attending to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.30
Mar-25-25	J. Trinh	Attending to preparation and registration discharges of PPSA financing statements in respect of Sale 056;	0.60
Mar-25-25	T. Li	Review of power of attorney and discuss with J. Fleisher indemnity therein; correspondence with Quebec counsel regarding same; correspondence with working group in respect of ongoing sales and lien discharges; call with client in respect of undertaking to discharge requested by potential purchaser of vehicles; review form of undertaking and further correspondence with client regarding same; review of due diligence searches provided by such potential purchaser;	1.10

Date	Name	Description	Hours
Mar-25-25	S. Kukulowicz	Review of Monitor's 24th Report;	0.30
Mar-25-25	C. Potter	Matters regarding PPSA discharges and related matters; correspondence regarding the same; matters regarding undertaking items and correspondence regarding the same;	0.30
Mar-25-25	N. Levine	Correspond with client; review materials; address lien issues; call with client; correspondence regarding lien issues;	1.00
Mar-25-25	J. Noel	Review draft PPSA discharges regarding non-RBC lien releases;	0.70
Mar-25-25	H. Dylewski	Attending to the registration of financing statements relating to Sale 007(A); receiving confirmation and verification statements of same; receiving and reviewing Ontario verification statements; correspondence with working group with respect to same;	1.00
Mar-25-25	H. Dylewski	Preparing draft ON, NL, NB and NS financing change statements relating to Sale 092; attending to the registration of financing statements; receiving confirmations and verification statements of same; receiving and reviewing Ontario verification statement; correspondence with working group with respect to same;	0.70
Mar-25-25	H. Dylewski	Preparing draft ON, NL, NB and NS financing change statements relating to Sale 087; attending to the registration of financing statements; receiving confirmations and verification statements of same; receiving and reviewing Ontario verification statement; correspondence with working group with respect to same;	0.70
Mar-25-25	H. Dylewski	Preparing draft ON, NL, NB and NS financing change statements relating to Sale 035; attending to the registration of financing statements; receiving confirmations and verification statements of same; attending to PPSA VIN search; receiving results of same; receiving and reviewing Ontario verification statement; correspondence with working group with respect to same;	0.90
Mar-25-25	H. Dylewski	Preparing draft ON, NL, NB and NS financing change statements relating to Sale 070; attending to the registration of financing statements; receiving confirmations and verification statements of same; receiving and reviewing Ontario verification statement; correspondence with working group with respect to same;	0.70
Mar-25-25	H. Dylewski	Preparing draft ON, NL, NB and NS financing change statements relating to Sale 094; attending to the registration of financing statements; receiving confirmations and verification statements of same; receiving and reviewing Ontario verification statement; correspondence with working group with respect to same;	0.70
Mar-25-25	E. Curtis	Review of draft discharges for sch. 007; updating internal tracker regarding open sales;	1.20
Mar-25-25	S. Rothery	Attend to PPSA matters; update internal status tracking	3.50

Date	Name	Description	Hours
		sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealer;	
Mar-25-25	E. Hyderman	Begin reviewing the Twenty Fourth Report of the Monitor;	0.30
Mar-25-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 092;	0.50
Mar-25-25	T. Konechny	Filing Alberta PPSA partial discharge in respect of non-RBC lien for sale 007(A);	0.20
Mar-25-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 087;	0.50
Mar-25-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 070;	0.50
Mar-25-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 094;	0.40
Mar-25-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 035;	0.40
Mar-25-25	J. Fleisher	Quebec matter;	0.40
Mar-25-25	A. Slota	Attending to updated Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches, further to same;	0.20
Mar-25-25	A. Slota	Attending to Alberta, Saskatchewan, Manitoba, Newfoundland and Labrador, New Brunswick, Nova Scotia and Prince Edward Island PPSA VIN due diligence request matters in respect of eleven VINs; conducting, obtaining and reviewing initial search results;	1.20
Mar-25-25	A. Slota	Attending to updated Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches, further to same;	0.20
Mar-25-25	A. Slota	Attending to updated Ontario PPSA VIN due diligence search request matters in respect of two VINs; conducting searches;	0.20
Mar-25-25	A. Slota	Attending to updated Ontario, British Columbia and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing initial searches;	0.30
Mar-25-25	A. Slota	Attending to updated Ontario and Manitoba PPSA VIN due diligence search request matters in respect of two VINs; conducting, obtaining and reviewing initial search results;	0.20
Mar-25-25	A. Slota	Attending to updated Ontario PPSA VIN due diligence search request matters in respect of two VINs; conducting searches, further to same;	0.20
Mar-26-25	J. Trinh	Receiving and reviewing confirmation/verification of PPSA discharge financing statements in respect of Sale 056 RBC syndicate registrations and providing report with respect to same;	0.60

Date	Name	Description	Hours
Mar-26-25	J. Trinh	Preparing draft ON PPSA discharge financing statement in respect of Sale 056 - Non-RBC;	0.20
Mar-26-25	T. Li	Correspondence with working group in respect of various third-party registrations; review of underlying searches and due diligence;	0.60
Mar-26-25	N. Levine	Correspondence regarding liens; call with team; review additional motion materials served;	0.60
Mar-26-25	H. Dylewski	Preparing draft ON, NL, NB and NS financing change statements relating to Sale 085; attending to the registration of financing statements; receiving confirmation and verification statement of same; receiving and reviewing Ontario verification statement; correspondence with working group with respect to same;	0.90
Mar-26-25	H. Dylewski	Preparing draft ON, NL, NB and NS financing change statements relating to Sale 084; attending to the registration of financing statements; receiving confirmation and verification statements of same; receiving and reviewing Ontario verification statement; correspondence with working group with respect to same;	1.10
Mar-26-25	H. Dylewski	Preparing draft ON financing change statements relating to Sale 070;	0.40
Mar-26-25	H. Dylewski	Preparing draft ON financing change statement relating to Sale 087;	0.30
Mar-26-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; Instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealers;	5.60
Mar-26-25	E. Curtis	Updating internal tracking table of open sales; reviewing Sale discharges for non-syndicate liens;	0.90
Mar-26-25	E. Hyderman	Continue reviewing the Applicant's Motion Record in connection with the March 27, 2025 hearing;	0.60
Mar-26-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 085;	0.50
Mar-26-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 084;	0.80
Mar-26-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches, further to same;	0.20
Mar-26-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of two VINs; obtaining and reviewing search results;	0.20
Mar-26-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of five VINs; conducting searches, further to same;	0.40
Mar-26-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search	0.20

Date	Name	Description	Hours
		request matters in respect of one VIN; obtaining and reviewing search results;	
Mar-26-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of two VINs; obtaining and reviewing balance of all search results;	0.20
Mar-26-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches, further to same;	0.20
Mar-26-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of ten VINs; conducting searches, further to same;	0.50
Mar-26-25	A. Slota	Attending to ongoing Ontario, British Columbia and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.20
Mar-26-25	A. Slota	Attending to ongoing Alberta, Saskatchewan, Manitoba, Newfoundland and Labrador, New Brunswick, Nova Scotia and Prince Edward Island PPSA VIN due diligence request matters in respect of eleven VINs; obtaining and reviewing balance of all search results;	3.10
Mar-26-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-26-25	A. Slota	Attending to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of two VINs; obtaining and reviewing balance of all search results, further to same;	0.30
Mar-27-25	J. Trinh	Preparing draft PPSA discharge financing statements in respect of Sale 085 non-RBC liens;	0.20
Mar-27-25	J. Trinh	Attending to registration of non-RBC syndicate lien PPSA financing statement with respect to Sale 056; receiving and reviewing confirmation/verification of same;	0.20
Mar-27-25	J. Trinh	Preparing draft PPSA discharge financing statements in respect of Sale 084 non-RBC liens;	0.30
Mar-27-25	J. Trinh	Attending to registration of AB, BC, MB, SK PPSA discharge financing statements in respect of Sale 029(B); receiving and reviewing confirmation/verification of same;	0.30
Mar-27-25	S. Kukulowicz	Review of additional Court materials;	0.30
Mar-27-25	C. Potter	Matters regarding discharges and related matters; correspondence regarding the same;	0.30
Mar-27-25	N. Levine	Emails regarding liens; emails regarding titles;	0.20
Mar-27-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 060; attending to the registration of financing statements; receiving PPSA confirmation/verification statements and providing report with respect to same;	0.60
Mar-27-25	H. Dylewski	Attending to the registration of financing statements	0.50

Date	Name	Description	Hours
Mar-27-25	H. Dylewski	relating to RBC syndicate liens pertaining Sale 029(B); receiving PPSA confirmation/verification statements and providing report with respect to same;	
Mar-27-25	H. Dylewski	Attending to the registration of financing statements relating to RBC syndicate liens pertaining Sale 070; receiving PPSA confirmation/verification statements and providing report with respect to same;	0.50
Mar-27-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 089; attending to the registration of financing statements; receiving PPSA confirmation/verification statements and providing report with respect to same;	0.60
Mar-27-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealers;	4.40
Mar-27-25	H. Dylewski	Attending to the registration of financing statements relating to RBC syndicate liens pertaining Sale 087; receiving PPSA confirmation/verification statements and providing report with respect to same;	0.40
Mar-27-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 090; attending to the registration of financing statements; receiving PPSA confirmation/verification statements and providing report with respect to same;	0.60
Mar-27-25	E. Curtis	Reviewing draft discharges for non-syndicate liens; updating internal tracker of open sales; corresponding with client to provide discharges on open liens;	1.50
Mar-27-25	E. Hyderman	Correspondence regarding hearing with Applicants' counsel and N. Levine; observing hearing and taking notes on the proceedings; summarizing proceedings and correspondence regarding same with Cassels team;	2.30
Mar-27-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 060;	0.40
Mar-27-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 090;	0.40
Mar-27-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 089;	0.40
Mar-27-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-27-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.20
Mar-27-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of five VINs; obtaining and	0.50

Date	Name	Description	Hours
Mar-27-25	A. Slota	reviewing search results; Attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of three VINs; conducting, obtaining and reviewing initial search results;	0.40
Mar-27-25	A. Slota	Attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing initial search results;	0.20
Mar-27-25	A. Slota	Attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing initial search results;	0.20
Mar-27-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of ten VINs; obtaining and reviewing search results;	0.50
Mar-27-25	A. Slota	Attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing initial search results, further to same;	0.20
Mar-27-25	A. Slota	Attending to Ontario, British Columbia and Saskatchewan PPSA VIN due diligence search request matters in respect of two VINs; conducting, obtaining and reviewing initial search results;	0.40
Mar-28-25	J. Trinh	Attending to registration of non-RBC syndicate PPSA discharge financing statements pertaining to Sale 085; receiving and reviewing confirmation/verification of same;	0.40
Mar-28-25	J. Trinh	Attending to registration of PPSA discharge financing statements in respect of Sale 084 non-RBC liens; receiving and reviewing confirmation/verification of same;	0.50
Mar-28-25	J. Trinh	Attending to preparation and registration of PPSA discharge financing statements relating to RBC syndicate liens pertaining to Sale 082; receiving and reviewing confirmation/verification of same; providing report with respect to discharges;	0.80
Mar-28-25	T. Li	Working group correspondence and meeting in respect of lien discharges and lien discharge protocol; review of Quebec power of attorney and correspondence with client regarding same;	0.70
Mar-28-25	J. Noel	Review draft PPSA discharges regarding non-RBC lien releases;	0.40
Mar-28-25	N. Levine	Correspondence regarding liens and outstanding VINs;	0.20
Mar-28-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 091; attending to the registration of financing statements; receiving PPSA confirmation/verification statements and providing report with respect to same;	0.70
Mar-28-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 059; attending to the registration of financing statements; receiving PPSA confirmation/verification statements and	0.70

Date	Name	Description	Hours
Mar-28-25	S. Rothery	providing report with respect to same; Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealers;	3.00
Mar-28-25	E. Curtis	Internal meeting to discuss ongoing instructions; reviewing non-syndicate draft discharges; updating internal trackers; ordering searches for potential sales; corresponding with clients regarding syndicate lien discharges;	2.80
Mar-28-25	A. Glover	Internal working group meeting regarding onboarding in respect of PPSA matters and correspondence regarding same;	0.70
Mar-28-25	A. Slota	Attending to ongoing Ontario, British Columbia and Saskatchewan PPSA VIN due diligence search request matters in respect of two VINs; obtaining and reviewing balance of all search results;	0.20
Mar-28-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches, further to same;	0.20
Mar-28-25	A. Slota	Attending to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.20
Mar-28-25	A. Slota	Attending to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of three VINs; obtaining and reviewing balance of all search results, further to same;	0.20
Mar-28-25	A. Slota	Attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing initial search results, further to same;	0.20
Mar-28-25	A. Slota	Attending to Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing initial search results, further to same;	0.20
Mar-28-25	A. Slota	Attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtaining and reviewing initial search results;	0.30
Mar-28-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.20
Mar-28-25	A. Slota	Attending to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.20

Date	Name	Description	Hours
Mar-28-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 059;	0.40
Mar-28-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 091;	0.40
Mar-30-25	N. Levine	Correspond with client regarding vehicles;	0.10
Mar-30-25	E. Curtis	Updating internal tracker regarding open sales;	0.10
Mar-31-25	N. Levine	Respond to client questions; call with lender counsel; call with client; review endorsement; correspondence regarding liens;	0.90
Mar-31-25	E. Curtis	Reviewing of draft discharges in upcoming sale; updating internal tracking charts;	0.60
Mar-31-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; Instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealers;	2.30
Mar-31-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches, further to same;	0.20
Mar-31-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing search results;	0.10
Mar-31-25	A. Slota	Attending to ongoing Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.30
Mar-31-25	A. Slota	Attending to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results VINs;	0.30
Mar-31-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of four VINs; conducting searches, further to same;	0.50
Mar-31-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtaining and reviewing balance of all search results;	0.30

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Clarkson-Maciel, Matteo	Business Advisor	3.40	700.00	2,380.00
Levine, Natalie	Partner	19.60	1,025.00	20,090.00
Kukulowicz, Shayne	Partner	5.00	1,650.00	8,250.00
Potter, Carla	Partner	4.80	840.00	4,032.00
Fleisher, Jonathan	Partner	2.80	1,190.00	3,332.00

Name	Title	Hours	Rate	Amount
Noel, J'Davia	Associate	25.50	525.00	13,387.50
Li, Timon	Associate	27.90	550.00	15,345.00
Rothery, Shae	Associate	67.40	500.00	33,700.00
Curtis, Erin	Associate	58.30	500.00	29,150.00
Hyderman, Eva	Associate	3.60	500.00	1,800.00
Glover, Anna	Associate	0.70	500.00	350.00
Konechny, Tiffany	Law Clerk / Paralegal	18.60	450.00	8,370.00
Trinh, Julia	Law Clerk / Paralegal	16.20	500.00	8,100.00
Slota, Alex	Law Clerk / Paralegal	69.30	450.00	31,185.00
Dylewski, Hannah	Law Clerk / Paralegal	46.20	400.00	18,480.00
TOTAL (CAD)		369.30		197,951.50

Our Fees	197,951.50
Less Discount	(19,795.15)
Total Fees	178,156.35
HST @ 13.00%	23,160.33
TOTAL FEES & TAXES (CAD)	201,316.68

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

Electronic Due Diligence	3,721.75
Corporate Filings	600.00
Driver's License Searches	1,666.00
PPSA - Registration/Applic./Discharges	3,149.95
BC Online - PPSA Search/Registrations	506.00
Total Non-Taxable Disbursements	9,643.70

Taxable Disbursements

PPSA - Registration/Applic./Discharges	17,804.80
Electronic Due Diligence	6,766.00
Total Taxable Disbursements	24,570.80
HST @ 13.00%	3,194.20
Total Taxable Disbursements & Taxes	27,765.00

TOTAL DISBURSEMENTS & TAXES (CAD)	37,408.70
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Cassels Brock & Blackwell LLP
Alvarez
Re: Court-appointment as Manager of certain assets of the Pride
Group

Page 33 of 33
Invoice No: 2282532
Matter No. 059366-00005

TOTAL FEES	178,156.35
TOTAL DISBURSEMENTS	34,214.50
TOTAL TAXES	26,354.53
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	238,725.38



Attn: Douglas McIntosh
Alvarez & Marsal Canada Inc., in its capacity as
Court-Appointed Manager over certain property of
TPine Leasing Capital Corporation et al.
200 Bay Street, Suite 3501
Royal Bank Plaza, South Tower
Toronto, ON M5J 2J1

Invoice No: 2282592
Date: May 26, 2025
Matter No.: 059366-00005
GST/HST No.: R121379572

Lawyer: Kukulowicz, Shayne
Tel.: (416) 860-6463
E-mail: SKukulowicz@cassels.com

Re: Court-appointment as Manager of certain assets of the Pride Group

Fees for professional services rendered up to and including April 30, 2025

Our Fees	196,077.50
Less Discount	(19,607.75)
Total Fees	176,469.75
Disbursements	43,362.33
Total Fees and Disbursements	219,832.08
HST @ 13.00%	27,542.63
TOTAL DUE (CAD)	247,374.71

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ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

Online Bill Payments:

Vendor name is **Cassels Brock Blackwell LLP** and
you are required to enter the first six digits of the
matter #

Invoice No: 2282592
Matter No.: 059366-00005

Amount: **CAD 247,374.71**

e-Transfer Payments: payments@cassels.com

Credit Card Payments: payments.cassels.com

Cassels Brock Blackwell LLP | cassels.com

Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL			
Date	Name	Description	Hours
Apr-01-25	T. Li	Calls and correspondence with working group in respect of ongoing discharges and sales; review of turn-over order in respect of certain non-scheduled vehicles and consider same with S. Rothery;	0.90
Apr-01-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC syndicate liens pertaining sale 098; attend to the registration of financing statements; receive PPSA confirmation/verification statements and providing report with respect to same;	0.40
Apr-01-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC syndicate liens pertaining sale 066; attend to the registration of financing statements; receive PPSA confirmation/verification statements and providing report with respect to same;	0.50
Apr-01-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealers; correspondence with N. Levine regarding RBC Bilat Assets; update internal memorandum regarding lien discharge procedure; correspondence with A. Glover regarding same;	4.80
Apr-01-25	E. Curtis	Review of initial searches and update internal trackers; requesting clerks to draft discharges;	1.20
Apr-01-25	E. Hyderman	Observe scheduling hearing; correspondence with N. Levine regarding same;	0.40
Apr-01-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of four VINs; obtain and review search results;	0.50
Apr-01-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.20
Apr-01-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of five VINs; obtain and review search results;	1.00
Apr-01-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 066;	0.50
Apr-01-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 098;	0.40
Apr-01-25	N. Levine	Respond to questions regarding order; and emails regarding assets hearing; respond to client inquiries;	0.60
Apr-01-25	A. Slota	Attend to Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial search results;	0.30
Apr-01-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request	0.90

Date	Name	Description	Hours
		matters in respect of four VINs; obtain and review search results;	
Apr-02-25	J. Noel	Discussions with lending team regarding lien discharge process; review PPSA searches regarding lien releases; correspond with A&M regarding potential incoming financier lien;	1.50
Apr-02-25	T. Li	Correspondence with S. Rothery regarding updates to lien discharge protocol; attend to Quebec lien discharge matters and review of Quebec discharge direction;	0.60
Apr-02-25	K. Seo	Review materials regarding PPSA discharges;	0.50
Apr-02-25	C. Potter	Matters regarding discharge process and related matters; calls regarding the same; review of correspondence relating to discharges;	0.50
Apr-02-25	J. Trinh	Attend to registration of PPSA discharge financing statements in respect of sale 026A RBC syndicate liens; receive and review confirmation/verification of same;	0.70
Apr-02-25	J. Trinh	Attend to registration of PPSA discharge financing statements in respect of sale 026B RBC syndicate liens; receive and review confirmation/verification of same;	0.70
Apr-02-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC syndicate liens pertaining to sale 100; attend to the registration of financing statements; receive PPSA confirmation/verification statements;	0.70
Apr-02-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC syndicate liens pertaining sale 101; attend to the registration of financing statements; receive PPSA confirmation/verification statements;	0.60
Apr-02-25	E. Curtis	Review of initial searches and reporting results to A&M;	2.30
Apr-02-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealers; status update discussion with C. Potter; correspondence with K. Seo regarding onboarding to file; correspondence with T. Li regarding corporate vehicle not appearing in schedules to collateral management order;	4.60
Apr-02-25	A. Glover	Review onboarding materials in preparation for reviewing searches in respect of vehicles sold by Alvarez;	0.60
Apr-02-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 101;	0.70
Apr-02-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 065;	0.60
Apr-02-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 036;	0.60
Apr-02-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in	0.80

Date	Name	Description	Hours
		respect of sale 100;	
Apr-02-25	A. Slota	Attend to Ontario, British Columbia and Saskatchewan PPSA VIN due diligence search request matters in respect of two VINs; conduct, obtain and review initial search results;	0.50
Apr-02-25	N. Levine	Emails regarding titling and liens; call with client;	0.40
Apr-02-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of four VINs; conducting searches;	0.40
Apr-02-25	A. Slota	Attend to Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial search results;	0.20
Apr-02-25	A. Slota	Attend to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial search results;	0.20
Apr-02-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conduct searches;	0.20
Apr-02-25	A. Slota	Attend to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.30
Apr-02-25	A. Slota	Attend to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial search results;	0.20
Apr-02-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of six VINs; conduct searches;	0.60
Apr-02-25	A. Slota	Attend to Ontario, British Columbia and Saskatchewan PPSA VIN due diligence search request matters in respect of three VINs; conduct, obtain and review initial search results;	0.70
Apr-03-25	J. Noel	Discussions with lending team regarding lien releases; correspond with Quebec counsel regarding lien releases; review PPSA searches; correspond with A&M regarding PPSA diligence;	1.90
Apr-03-25	T. Li	Review of various orders and updated lien discharge protocol; call with working group in respect of ongoing sales and lien releases and review of lien search summaries; Attend to Quebec lien discharge matters;	1.90
Apr-03-25	K. Seo	Review and discuss materials regarding PPSA discharges;	1.20
Apr-03-25	H. Dylewski	Continue reviewing PPSA confirmation/verification statements relating to RBC syndicate liens pertaining sale 100; provide report with respect to same;	0.50
Apr-03-25	H. Dylewski	Continue receiving PPSA confirmation/verification statements relating to RBC syndicate liens pertaining sale 101; providing report with respect to same;	0.70
Apr-03-25	E. Curtis	Internal discussion re process; review of initial searches of potential sale notices; review of draft discharges; review of bringdown search results; reporting to A&M;	5.10
Apr-03-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; instruct clerks	4.20

Date	Name	Description	Hours
		to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealers; instruct A. Glover and K. Seo regarding lien release procedure;	
Apr-03-25	A. Glover	Internal working group call in respect of PPSA review for incoming sales;	1.00
Apr-03-25	A. Slota	Attend to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.30
Apr-03-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of three VINs; conducting searches;	0.60
Apr-03-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of four VINs; obtain and review search results;	0.40
Apr-03-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.20
Apr-03-25	A. Slota	Attend to ongoing Ontario, British Columbia and Saskatchewan PPSA VIN due diligence search request matters in respect of three VINs; obtain and review search results;	0.50
Apr-03-25	A. Slota	Attend to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.30
Apr-03-25	A. Slota	Attend to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.30
Apr-03-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of six VINs; obtain and review search results;	0.60
Apr-03-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches;	0.20
Apr-03-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches;	0.20
Apr-03-25	A. Slota	Attend to ongoing Ontario, British Columbia and Saskatchewan PPSA VIN due diligence search request matters in respect of two VINs; conduct, obtain and review search results;	0.40
Apr-03-25	N. Levine	Emails regarding lien releases; address POA issues; confer with Cassels team; review report;	0.50
Apr-04-25	J. Noel	Correspond with Quebec counsel regarding lien releases; review potential sale notices; review draft PPSA discharge;	0.80
Apr-04-25	T. Li	Review of various orders and updated lien discharge protocol; correspondence with working group in respect of ongoing sales and lien releases and review of lien search summaries; Attend to Quebec lien discharge matters;	1.60

Date	Name	Description	Hours
Apr-04-25	K. Seo	Review PPSA searches and discharges;	3.70
Apr-04-25	C. Potter	Matters regarding PPSA discharges and related matters; correspondence regarding the same;	0.30
Apr-04-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to non-RBC syndicate liens pertaining to sale 101; attend to the registration of PPSA financing statements; receive confirmations/verification statements of same; provide report with respect to same;	1.40
Apr-04-25	E. Curtis	Review of initial searches; update trackers; review of bringdown searches; review of draft discharges;	3.80
Apr-04-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; instruct clerks to prepare draft discharges; review draft discharges; correspondence with client regarding lien discharges in relation to certain Pride vehicles being sold by dealers;	2.90
Apr-04-25	A. Glover	Review draft discharges in respect of sale 101; review PPSA searches on sale no. 045 and report on same;	2.00
Apr-04-25	A. Slota	Attend to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial search results;	0.30
Apr-04-25	A. Slota	Attend to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of two VINs; conduct, obtain and review initial search results;	0.40
Apr-04-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of three VINs; conduct searches;	0.40
Apr-04-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of two VINs; conduct searches;	0.40
Apr-04-25	A. Slota	Attend to Ontario, Manitoba, Alberta, and Saskatchewan PPSA VIN due diligence search request matters in respect of two VINs; conduct, obtain and review initial search results;	1.10
Apr-04-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review search results;	0.30
Apr-04-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.20
Apr-04-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 007(B);	0.60
Apr-04-25	T. Konechny	Attend to drafting Ontario PPSA discharges and partial discharges in respect of sale 100;	0.70
Apr-04-25	T. Konechny	Attend to drafting and filing Ontario PPSA discharge in respect of sale 086;	0.20
Apr-04-25	T. Konechny	Attend to drafting Ontario PPSA partial discharges in respect of sale 045;	0.20
Apr-04-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of three VINs; obtain and review	0.60

Date	Name	Description	Hours
		search results;	
Apr-04-25	N. Levine	Correspondence regarding lien releases;	0.10
Apr-05-25	K. Seo	Reviewing PPSA searches;	0.30
Apr-05-25	A. Glover	Review PPSA searches in respect of sale 048, 049 and 050 and report on same;	1.50
Apr-06-25	K. Seo	Review PPSA searches;	0.60
Apr-06-25	E. Curtis	Review of initial searches;	0.60
Apr-07-25	J. Noel	Discussions with lien discharge team regarding discharge process; review potential sale notices;	1.10
Apr-07-25	T. Li	Correspondence with working group in respect of novel security registrations and review of same; review of lien discharge order and turn-over order; review of PPSA lien discharges and proposed discharge mechanics in respect of certain vehicles; Attend to other lien discharge and security release matters;	1.30
Apr-07-25	K. Seo	Review PPSA searches; coordinating discharge of liens;	0.70
Apr-07-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; Instruct clerks to prepare draft discharges; review draft discharges; instruct clerks to file PPSA discharges; instruct T. Li, J. Noel, E. Curtis, A. Glover, and K. Seo regarding internal sale tracking process;	2.30
Apr-07-25	E. Curtis	Review draft discharges and bringdown searches;	0.90
Apr-07-25	A. Glover	Internal working group meeting in respect of PPSA lien review and sale notice tracking procedures; review searches in respect of sale 102A to Metro and reporting in respect of same; correspondence regarding draft discharges for sale 102; review searches in respect of sale 050 to Brandt and reporting in respect of same;	4.40
Apr-07-25	A. Slota	Attend to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of five VINs; conduct, obtain and review search results;	1.00
Apr-07-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of three VINs; obtain and review search results;	0.30
Apr-07-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of two VINs; obtain and review search results;	0.20
Apr-07-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.20
Apr-07-25	T. Konechny	Attend to filing Ontario PPSA discharges and partial discharges in respect of sale 100;	0.40
Apr-07-25	T. Konechny	Attend to filing Alberta PPSA discharge in respect of sale 007(B);	0.20
Apr-07-25	T. Konechny	Attend to drafting Manitoba PPSA discharges in respect of sale 050;	0.20

Date	Name	Description	Hours
Apr-07-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 102(A);	1.00
Apr-07-25	N. Levine	Correspondence regarding liens;	0.20
Apr-07-25	A. Slota	Attend to nationwide provincial (save for Quebec) PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial search results;	1.00
Apr-07-25	A. Slota	Attend to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.10
Apr-07-25	A. Slota	Attend to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of two VINs; obtain and review search results;	0.20
Apr-07-25	A. Slota	Attend to Saskatchewan PPSA VIN due diligence search request matters in respect of four VINs; conduct, obtain and review search results;	0.80
Apr-07-25	A. Slota	Attend to ongoing Ontario, Manitoba, Alberta, and Saskatchewan PPSA VIN due diligence search request matters in respect of two VINs; obtain and review search results;	0.20
Apr-08-25	T. Li	Coordinate and review additional lien and due diligence searches in respect of various sales; review of draft discharges; review of due diligence summaries and Attend to related discharge and security matters;	1.50
Apr-08-25	J. Noel	Review PPSA searches regarding lien releases; correspond with Quebec counsel regarding draft discharges;	4.40
Apr-08-25	A. Glover	Review PPSA searches in connection with sale 079(A) (Brandt);	0.20
Apr-08-25	E. Curtis	Review of initial searches and reporting results to prepare draft discharges;	1.50
Apr-08-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; instruct clerks to prepare draft discharges; review draft discharges; instruct clerks to file PPSA discharges;	1.90
Apr-08-25	A. Slota	Attend to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial search results;	0.50
Apr-08-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review search results;	0.30
Apr-08-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of four VINs; conduct searches;	0.50
Apr-08-25	A. Slota	Attend to ongoing nationwide provincial (save for Quebec) PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.30
Apr-08-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 069;	0.50

Date	Name	Description	Hours
Apr-08-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 073;	0.50
Apr-08-25	T. Konechny	Attend to drafting Ontario PPSA partial discharges and discharge in respect of sale 102(A); filing same;	0.40
Apr-08-25	N. Levine	Correspondence regarding missing VINs; call with client regarding same;	0.30
Apr-09-25	T. Li	Correspondence and discussions with working group in respect of open sale transactions and due diligence; review of due diligence results and draft discharges; coordinating Quebec discharges and correspondence in respect of power of attorney and Quebec matters; Attend to other lien discharge and security matters;	1.60
Apr-09-25	J. Noel	Review PPSA search results and draft discharges regarding lien releases;	4.50
Apr-09-25	J. Trinh	Prepare draft PPSA discharge in respect of non RBC syndicate lien relating to sale 069; attend to registration of same; receive and review PPSA confirmation/verification statement;	0.40
Apr-09-25	E. Curtis	Review of initial searches;	0.80
Apr-09-25	H. Dylewski	Prepare draft PPSA discharge financing statement relating to non-RBC syndicate liens pertaining sale 073; attend to the registration of financing statement; receive confirmation/verification statement of same; provide report with respect to same;	0.50
Apr-09-25	H. Dylewski	Prepare draft PPSA discharge financing statement relating to non-RBC syndicate liens pertaining sale 067;	0.20
Apr-09-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to non-RBC syndicate liens pertaining sale 058;	0.30
Apr-09-25	E. Curtis	Correspondence with A&M to communicate draft discharges;	0.30
Apr-09-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; instruct clerks to prepare draft discharges;	3.30
Apr-09-25	A. Glover	Review draft discharges in respect of sales nos. 069 and 073; review searches in respect of sale 079(A);	1.70
Apr-09-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conduct searches;	0.20
Apr-09-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conduct searches;	0.20
Apr-09-25	A. Slota	Attend to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.30
Apr-09-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of four VINs; obtain and review search results;	0.50
Apr-10-25	K. Seo	Review PPSA searches; coordinating discharge of liens;	1.40

Date	Name	Description	Hours
Apr-10-25	T. Li	Correspondence and discussions with working group in respect of open sale transactions and due diligence; review of due diligence results and draft discharges; review of Manitoba PPSA and regulations thereto in respect of certain discharges and correspondence with S. Rothery regarding same; review of lien discharge order and collateral management order;	1.80
Apr-10-25	J. Trinh	Prepare draft discharge financing statement in respect of non-RBC syndicate lien for sale 099;	0.20
Apr-10-25	J. Trinh	Prepare draft discharge financing statement in respect of non-RBC syndicate lien for sale 095;	0.20
Apr-10-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to non-RBC syndicate liens pertaining sale 078;	0.30
Apr-10-25	H. Dylewski	Prepare draft PPSA discharge financing statement relating to non-RBC syndicate liens pertaining sale 079(B);	0.20
Apr-10-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to non-RBC syndicate liens pertaining sale 062(A);	1.00
Apr-10-25	E. Curtis	Review of initial search summaries; review of bringdown searches in connection with sale notice;	1.80
Apr-10-25	A. Glover	Review searches in respect of sale 080 and request draft discharges in respect of same; revise discharges for Manitoba registrations for sale 050;	1.80
Apr-10-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; instruct clerks to prepare draft discharges;	1.50
Apr-10-25	T. Konechny	Attend to drafting Manitoba PPSA partial discharges in respect of sale 050;	0.30
Apr-10-25	T. Konechny	Attend to drafting Manitoba and Ontario PPSA partial discharges in respect of sale 79A;	0.40
Apr-10-25	N. Levine	Email with company counsel; call with client; correspondence regarding discharges;	0.30
Apr-10-25	S. Kukulowicz	Telephone attendance with N. Levine regarding status;	0.20
Apr-10-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.20
Apr-10-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.20
Apr-11-25	T. Li	Correspondence and discussions with working group in respect of open sale transactions and due diligence; review of due diligence results and draft discharges; call with working group in respect of changes to lien discharge protocol and comments to due diligence summaries and certain draft lien discharges; Attend to related lien release and security review matters;	2.60
Apr-11-25	K. Seo	Review PPSA searches; coordinating discharge of liens;	5.90

Date	Name	Description	Hours
Apr-11-25	J. Noel	Review PPSA search results and draft discharges regarding lien releases; discussions with lending team regarding lien release process;	4.10
Apr-11-25	J. Trinh	Prepare draft PPSA discharge financing statements in respect of non-RBC syndicate liens in respect of sale 109; attend to registration of same; receive and review PPSA confirmation/verification statements;	0.70
Apr-11-25	J. Trinh	Prepare draft PPSA discharge financing statements in respect of non-RBC syndicate liens in respect of sale 058B;	0.60
Apr-11-25	E. Curtis	Review of sale notices 105, 109, 79(B); review of draft discharges; correspondence with A&M to communicate discharges; review search summaries; internal meeting;	3.10
Apr-11-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC and non-syndicate liens pertaining sale 105; attend to the registration of financing statement; receive confirmation/verification statement of same;	0.60
Apr-11-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC syndicate liens pertaining sale 102(B); attend to the registration of financing statement; receive confirmation/verification statement of same;	0.60
Apr-11-25	H. Dylewski	Attend to the registration of financing statements relating to the non-syndicate liens pertaining to sale 105; receive confirmations/verification statements of same; provide report with respect to same;	0.40
Apr-11-25	H. Dylewski	Attend to the registration of MB PPSA financing statement relating to sale 079(B); receive verification statement of same; provide report with respect to same;	0.20
Apr-11-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC syndicate liens pertaining sale 109; attend to the registration of financing statement; receive confirmation/verification statement of same;	0.40
Apr-11-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC syndicate liens pertaining sale 079(B); attend to the registration of financing statement; receive confirmation/verification statement of same; provide report with respect to same;	0.60
Apr-11-25	H. Dylewski	Prepare draft PPSA discharge financing statement relating to non-syndicate liens pertaining sale 080;	0.30
Apr-11-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC syndicate liens pertaining sale 093; attend to the registration of financing statement; receive confirmation/verification statement of same; provide report with respect to same;	0.60
Apr-11-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC syndicate liens pertaining sale 062(A) ; attend to the registration of financing statements relating to the RBC and non-syndicate liens; receive confirmation/verification statement of same; provide report with respect to same;	1.90

Date	Name	Description	Hours
Apr-11-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC syndicate liens pertaining sale 108; attend to the registration of financing statement; receive confirmation/verification statement of same; provide report with respect to same;	0.60
Apr-11-25	A. Glover	Review and report on PPSA searches for sale 081 (Brandt); review and instruct clerks to discharge registrations in respect of sale 062 (Velocity); review of initial PPSA searches in respect of sale 108 (Velocity); Internal working group call in respect of ongoing Pride matters;	2.50
Apr-11-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; instruct clerk to order PPSA searches; review PPSA searches; Instruct clerks to prepare draft discharges; discussion with T. Li, J. Noel, E. Curtis, A. Glover and K. Seo regarding lien discharge process;	6.40
Apr-11-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 102(B);	0.40
Apr-11-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 079(B);	0.40
Apr-11-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 062(A);	1.20
Apr-11-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 105;	0.80
Apr-11-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 109;	0.80
Apr-11-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 108;	0.40
Apr-11-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 093;	0.40
Apr-11-25	N. Levine	Call with client; review emails; review documents;	0.70
Apr-11-25	S. Kukulowicz	Review of emails regarding no back-funder VIN and discussed same with N. Levine;	0.30
Apr-11-25	A. Slota	Attend to Ontario and Alberta PPSA VIN due diligence search request matters in respect of eight VINs; conduct, obtain and review initial searches;	0.80
Apr-11-25	A. Slota	Attend to provincial (all provinces, save for Quebec) PPSA VIN due diligence search request matters in respect of 11 VINs; conduct, obtain and review initial search results;	2.00
Apr-11-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of three VINs; conduct searches;	0.30
Apr-11-25	A. Slota	Attend to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial search results;	0.20
Apr-11-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conduct searches;	0.20
Apr-11-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request	0.30

Date	Name	Description	Hours
Apr-11-25	A. Slota	matters in respect of three VINs; conduct searches; Attend to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.20
Apr-11-25	A. Slota	Attend to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.20
Apr-11-25	A. Slota	Attend to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conducting, obtain and review initial searches;	0.20
Apr-11-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conducting searches;	0.20
Apr-13-25	A. Glover	Review and report on PPSA searches in connection with sales 106 and 107; order draft discharges in connection with sales 106 and 107;	1.70
Apr-14-25	E. Curtis	Review draft discharges; review bring-downs; report completed sales to A&M;	3.80
Apr-14-25	J. Noel	Coordinate PPSA searches and lien discharges regarding sale notices and potential sale notices; review PPSA searches regarding lien releases; correspond with A&M regarding diligence searches; correspond with Quebec counsel regarding lien releases;	2.50
Apr-14-25	T. Li	Review of due diligence searches and draft discharges; correspondence with working group regarding same;	1.10
Apr-14-25	J. Trinh	Prepare draft PPSA discharge financing statements in respect of non-RBC syndicate liens in respect of sale 106;	0.20
Apr-14-25	J. Trinh	Prepare draft PPSA discharge financing statements in respect of non-RBC syndicate liens in respect of sale 107;	0.20
Apr-14-25	C. Potter	Matters regarding discharges and correspondence regarding the same;	0.30
Apr-14-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC syndicate liens pertaining sale 050; attend to the registration of financing statements; receive confirmations/verification statements of same;	1.00
Apr-14-25	H. Dylewski	Continue receiving confirmation/verification statement pertaining to sale 102(B); providing report with respect to same;	0.50
Apr-14-25	H. Dylewski	Continue receiving confirmation/verification statement pertaining to sale 109; providing report with respect to same;	0.50
Apr-14-25	H. Dylewski	Continue receiving confirmation/verification statement pertaining to sale 105; providing report with respect to same;	0.50
Apr-14-25	M. Clarkson-Maciel	Analysis on TPine EV charging station lease with Walmart and consideration of business approach on the same; conference with N. Levine regarding analysis; conference with A&M regarding the same;	4.00

Date	Name	Description	Hours
Apr-14-25	E. Fetahu	Attend to corporate searches; obtaining copies of corporate documents; email correspondence and discussions with agent with respect to searches and search summary; review search results and prepare report with respect to same; email correspondence and discussions with N. Levine;	0.20
Apr-14-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; Instruct clerks to prepare and file draft lien discharges; correspondence with client regarding lien discharges;	1.80
Apr-14-25	A. Glover	Review bringdown searches in connection with sale 079(B) and report to A&M in respect of same; review draft discharges in connection with sale 050 and sale 108;	1.80
Apr-14-25	A. Slota	Attend to Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.20
Apr-14-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 050;	1.00
Apr-14-25	T. Konechny	Attend to drafting and filing Manitoba non-RBC PPSA discharges in respect of sale 050;	0.40
Apr-14-25	T. Konechny	Attend to drafting British Columbia non-RBC PPSA discharge in respect of sale 108; filing same;	0.20
Apr-14-25	A. Slota	Attend to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.20
Apr-14-25	A. Slota	Attend to ongoing provincial (all provinces, save for Quebec) PPSA VIN due diligence search request matters in respect of 11 VINs; obtain and review search results;	2.00
Apr-14-25	A. Slota	Attend to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.20
Apr-14-25	A. Slota	Attend to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.20
Apr-14-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.10
Apr-14-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of three VINs; obtain an review search results;	0.30
Apr-14-25	A. Slota	Attend to Ontario, Manitoba, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of four VINs; conduct, obtain and review initial searches;	0.50
Apr-14-25	A. Slota	Attend to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; obtain and review searches;	0.20
Apr-14-25	A. Slota	Attend to ongoing Ontario and British Columbia PPSA VIN	0.20

Date	Name	Description	Hours
		due diligence search request matters in respect of one VIN; obtain and review search results;	
Apr-14-25	A. Slota	Attend to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtain and review searches;	0.20
Apr-14-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of four VINs; conduct searches;	0.40
Apr-14-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.10
Apr-14-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of four VINs; conduct searches;	0.40
Apr-14-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of two VINs; conduct searches;	0.20
Apr-14-25	A. Slota	Attend to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of eight VINs; obtain and review searches;	0.80
Apr-14-25	A. Slota	Attend to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.20
Apr-14-25	A. Slota	Attend to Ontario, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.30
Apr-14-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of three VINs; obtain and review search results;	0.30
Apr-14-25	N. Levine	Emails regarding discharges; review leases; call with Walmart regarding same; draft email to Walmart; discuss same with client;	1.80
Apr-15-25	J. Noel	Review sale notices and potential sale notices.	0.30
Apr-15-25	E. Curtis	Review draft discharges; review potential sale searches;	1.60
Apr-15-25	K. Seo	Review PPSA searches; coordinate discharge of liens;	0.20
Apr-15-25	T. Li	Correspondence with working group in respect of novel security registrations and review of same; review of PPSA lien discharges and proposed discharge mechanics in respect of certain vehicle; review of orders; Attend to other lien discharge and security release matters;	1.50
Apr-15-25	M. Clarkson-Maciel	Draft correspondence with Daimler regarding EV chargers; call with A&M regarding the same;	1.50
Apr-15-25	A. Glover	Review bringdown searches in respect of sale 062(A) and summarize RSLA liens; draft email to A&M in respect of RSLA liens found for sale 062(A);	3.30
Apr-15-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; correspondence with client regarding lien discharges;	1.10
Apr-15-25	N. Levine	Address charger issues; correspondence regarding liens;	0.60

Date	Name	Description	Hours
Apr-15-25	A. Slota	review appeal materials; Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of two VINs; obtain and review search results;	0.20
Apr-15-25	A. Slota	Attend to ongoing Ontario, Manitoba, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of four VINs; obtain and review search results;	1.00
Apr-15-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of four VINs; obtain and review search results;	0.40
Apr-15-25	A. Slota	Attend to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.20
Apr-15-25	A. Slota	Attend to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.20
Apr-15-25	A. Slota	Attend to ongoing Ontario, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.30
Apr-15-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of four VINs; obtain and review search results;	0.40
Apr-15-25	A. Slota	Attend to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.20
Apr-15-25	A. Slota	Attend to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.20
Apr-15-25	S. Kukulowicz	Review of materials regarding motion for leave to appeal; review of emails regarding Walmart;	0.50
Apr-16-25	J. Noel	Coordinate PPSA searches and lien discharges regarding sale notices and potential sale notices;	1.20
Apr-16-25	E. Curtis	Review active sale draft discharges;	0.50
Apr-16-25	K. Seo	Review PPSA searches; coordinate discharge of liens;	2.20
Apr-16-25	T. Li	Review of PPSA lien summaries and draft discharges; review of amended court orders;	0.80
Apr-16-25	M. Clarkson-Maciel	Correspondence with counsel for Daimler regarding Daimler's potential security interest in EV chargers also subject to the syndicate's security interest;	0.10
Apr-16-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC syndicate liens pertaining sale 039; attend to the registration of financing statements; receive confirmation/verification statement of same; provide report with respect to same;	2.00
Apr-16-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges;	0.20
Apr-16-25	E. Hyderman	Correspondence with N. Levine regarding served Motion	0.10

Date	Name	Description	Hours
		Record;	
Apr-16-25	A. Glover	Review PPSA searches in connection with sale 111;	0.40
Apr-16-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of three VINs; conduct searches;	0.30
Apr-16-25	N. Levine	Review motion materials; emails regarding liens; correspondence regarding chargers;	0.50
Apr-16-25	S. Kukulowicz	Review of Pride motion record regarding Sweetwater transaction and Roynat distribution;	0.30
Apr-17-25	J. Noel	Coordinate PPSA searches and lien discharges regarding sale notices and potential sale notices;	0.70
Apr-17-25	K. Seo	Review PPSA searches; coordinate discharge of liens;	2.50
Apr-17-25	T. Li	Review of various PPSA and due diligence searches and summaries; calls and correspondence with working group in respect of certain PPSA registrations; meeting with M. Clarkson-Maciel in respect of lien discharge order and second amended and restated collateral management order; review orders and consider issue of certain judgment liens identified in due diligence results against vehicles;	2.60
Apr-17-25	J. Trinh	Prepare draft PPSA discharge financing statement in respect of non-RBC syndicate lien pertaining to sale 075;	0.20
Apr-17-25	J. Trinh	Prepare draft PPSA discharge financing statement in respect of non-RBC syndicate lien pertaining to sale 124;	0.20
Apr-17-25	J. Trinh	Prepare draft PPSA discharge financing statement in respect of non-RBC syndicate lien pertaining to sale 122;	0.30
Apr-17-25	J. Trinh	Prepare draft PPSA discharge financing statement in respect of non-RBC syndicate lien pertaining to sale 123;	0.20
Apr-17-25	J. Trinh	Prepare draft PPSA discharge financing statement in respect of non-RBC syndicate lien pertaining to sale 076;	0.20
Apr-17-25	M. Clarkson-Maciel	Conference with S. Kukulowicz regarding funds flow distributions to administrative agent; analysis of motion record for the applicants regarding the sale of US assets to review relevance to the Manager; consideration of funds flow distribution language proposed by administrative agent; conference with T. Li regarding lien storage release language as it applies to certain writ of executions arising from repair and storage activities over Management Property; numerous correspondence with client regarding the same;	3.60
Apr-17-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; discussion with T. Li regarding Report of Seizure and Writ of Enforcement in Alberta with respect to one VIN;	1.40
Apr-17-25	A. Glover	Review Alberta searches in respect of sale 111 and internal working group discussion in respect of same;	0.60
Apr-17-25	E. Curtis	Review potential sale notices for non-syndicate liens;	0.60
Apr-17-25	N. Levine	Emails regarding distributions and motion record; confer	0.30

Date	Name	Description	Hours
		with team regarding same;	
Apr-17-25	S. Kukulowicz	Review of emails regarding CM distributions and discussed direction terms with M. Clarkson-Maciel; review of the Monitor's 25th Report;	0.90
Apr-17-25	A. Slota	Attend to Ontario and Alberta PPSA VIN due diligence search request matters in respect of three VINs; conduct, obtain and review initial searches;	0.60
Apr-17-25	A. Slota	Attend to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of two VINs; conduct, obtain and review initial searches;	0.40
Apr-17-25	A. Slota	Attend to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.30
Apr-17-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of three VINs; obtain and review search results;	0.30
Apr-17-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of three VINs; conduct searches;	0.30
Apr-17-25	A. Slota	Attend to Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.20
Apr-17-25	A. Slota	Attend to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.30
Apr-20-25	N. Levine	Consider variance report and Monitor's materials; correspond with client;	0.60
Apr-21-25	J. Noel	Review PPSA searches regarding lien releases; coordinate PPSA searches and draft discharges with respect to sale notices and potential sale notices;	1.80
Apr-21-25	K. Seo	Review PPSA searches; coordinate discharge of liens;	0.40
Apr-21-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC syndicate liens pertaining sale 118;	1.10
Apr-21-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC syndicate liens pertaining sale 119;	1.40
Apr-21-25	A. Glover	Draft correspondence in respect of Alberta writ of execution hits in connection with sale 111;	0.60
Apr-21-25	A. Slota	Attend to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of three VINs; obtain and review search results;	0.30
Apr-21-25	A. Slota	Attend to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.30
Apr-21-25	A. Slota	Attend to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of two VINs; obtain and review search results;	0.20
Apr-21-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of three VINs; conduct searches;	0.30

Date	Name	Description	Hours
Apr-21-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of five VINs; conduct searches;	0.50
Apr-21-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of three VINs; obtain and review search results;	0.30
Apr-21-25	N. Levine	Emails regarding charges; work on letter; revise letter; review update regarding direction;	0.50
Apr-21-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of five VINs; conduct searches;	0.50
Apr-21-25	A. Slota	Attend to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.30
Apr-21-25	A. Slota	Attend to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.20
Apr-21-25	M. Clarkson-Maciel	Drafting letter to SBTC regarding VIN incorrectly transferred to manager; correspondence with A&M regarding the same; coordinating mailing of letter;	1.90
Apr-22-25	J. Noel	Coordinate PPSA searches and lien discharges regarding sale notices and potential sale notices; review PPSA searches and draft discharges;	5.50
Apr-22-25	J. Trinh	Prepare draft PPSA discharges relating to Non-RBC syndicate liens relating to sale 117;	0.50
Apr-22-25	T. Li	Review of due diligence searches, draft discharges and lien summaries; correspondence and calls with working group regarding ongoing vehicle sales and MTO searches; draft and send reporting e-mail to N. Levine and C. Potter in respect of certain specialized liens and analysis of orders and legal research regarding same;	1.80
Apr-22-25	J. Trinh	Prepare draft PPSA discharges relating to Non-RBC syndicate liens relating to sale 118;	0.30
Apr-22-25	J. Trinh	Attend to preparation and registration of PPSA discharges relating to RBC syndicate liens relating to sale 111; receive and review confirmation/verification statements;	0.80
Apr-22-25	J. Trinh	Attend to preparation and registration of PPSA discharges relating to RBC syndicate liens relating to sale 120; receive and review confirmation/verification statements;	0.80
Apr-22-25	J. Trinh	Prepare draft PPSA discharges relating to Non-RBC syndicate liens relating to sale 119;	0.30
Apr-22-25	J. Trinh	Attend to preparation and registration of PPSA discharges relating to RBC syndicate liens relating to sale 117; receive and review confirmation/verification statements;	0.80
Apr-22-25	H. Dylewski	Attend to the registration of PPSA financing statements pertaining sale 119; receive confirmation/verification statement of same; provide report with respect to same;	1.40
Apr-22-25	H. Dylewski	Attend to the registration of PPSA financing statements pertaining sale 118; receive confirmation/verification	0.80

Date	Name	Description	Hours
Apr-22-25	A. Glover	statements of same; provide report with respect to same; Report on PPSA search results for sale 111 and request corresponding discharges; review PPSA search results for sale 112 and correspondence with A&M regarding same; report on PPSA search results for sale 118, request corresponding discharges and review same; review discharges for sale 122;	4.80
Apr-22-25	E. Curtis	Review active sale searches and bringdown searches; report to A&M; update internal tracker; review searches required as potential sales;	5.80
Apr-22-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of five VINs; obtain and review search results;	0.50
Apr-22-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of five VINs; obtain and review search results;	0.50
Apr-22-25	T. Konechny	Attend to drafting Ontario and Alberta PPSA partial discharges for non-RBC liens in respect of sale 111;	0.40
Apr-22-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of three VINs; obtain and review search results;	0.30
Apr-22-25	N. Levine	Review sale notices; review record; emails regarding record and DIP issues;	0.60
Apr-23-25	J. Noel	Review and coordinate PPSA searches and lien discharges; discussions with K. Seo and T. Li regarding file administration;	1.30
Apr-23-25	K. Seo	Review PPSA searches; coordinate discharge of liens;	2.20
Apr-23-25	J. Trinh	Revise draft PPSA discharge financing statement relating to Non-RBC syndicate liens relating to sale 117;	0.20
Apr-23-25	J. Trinh	Attend to preparation and registration of PPSA discharges relating to RBC syndicate liens relating to sale 125; receive and review confirmation/verification statements;	0.80
Apr-23-25	J. Trinh	Attend to registration of PPSA discharges relating to Non-RBC syndicate liens relating to sale 122; receive and review confirmation/verification of same;	0.30
Apr-23-25	J. Trinh	Attend to preparation and registration of PPSA discharges relating to RBC syndicate liens relating to sale 121; receive and review confirmation/verification statements;	0.80
Apr-23-25	J. Trinh	Attend to registration of PPSA discharges relating to Non-RBC syndicate liens relating to sale 119; receive and review confirmation/verification of same;	0.30
Apr-23-25	C. Potter	Matters regarding PPSA discharges and related matters; correspondence regarding the same;	0.40
Apr-23-25	T. Li	Review of due diligence searches, draft discharges and lien summaries; correspondence and calls with working group regarding ongoing vehicle sales and MTO searches; review of MTO search results and summarize same; coordinating	2.60

Date	Name	Description	Hours
Apr-23-25	J. Trinh	Quebec discharges and correspondence regarding same; Prepare PPSA discharges relating to Non-RBC syndicate liens relating to sale 125;	0.50
Apr-23-25	J. Trinh	Attend to registration of PPSA discharges relating to Non-RBC syndicate liens relating to sale 118; receive and review confirmation/verification of same;	0.40
Apr-23-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC syndicate liens pertaining sale 122; attend to the registration of financing statements; receive confirmations/verification statements of same;	1.00
Apr-23-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review correspondence from client regarding vehicle sales and lien discharges;	0.30
Apr-23-25	A. Glover	Review and report on PPSA searches registered in connection with sales 112 and 113; correspondence with A&M in respect of liens representing special issues; review draft discharges for sale 119;	2.00
Apr-23-25	E. Curtis	Review draft discharges for active sales; potential sale notices;	2.50
Apr-23-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conduct searches;	0.20
Apr-23-25	A. Slota	Attend to Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.30
Apr-23-25	A. Slota	Attend to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.30
Apr-23-25	A. Slota	Attend to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.20
Apr-23-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conduct searches;	0.20
Apr-23-25	A. Slota	Attend to Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.20
Apr-23-25	A. Slota	Attend to Ontario and Alberta PPSA VIN due diligence search request matters in respect of four VINs; conduct, obtain and review initial searches;	0.50
Apr-23-25	A. Slota	Attend to Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.20
Apr-23-25	A. Slota	Attend to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.20
Apr-23-25	A. Slota	Attend to Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of one VIN;	0.30

Date	Name	Description	Hours
		conduct, obtain and review initial searches;	
Apr-23-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conduct searches;	0.20
Apr-23-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conduct searches;	0.20
Apr-23-25	A. Slota	Attend to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.30
Apr-23-25	A. Slota	Attend to Ontario, Manitoba and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.30
Apr-23-25	A. Slota	Attend to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review initial searches;	0.20
Apr-23-25	A. Slota	Attend to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of tow VINs; conduct, obtain and review initial searches;	0.50
Apr-23-25	N. Levine	Call with client;	0.20
Apr-24-25	J. Noel	Review draft PPSA discharges regarding lien releases; discussions with lending team regarding lien releases;	0.70
Apr-24-25	K. Seo	Update tracking documents;	3.80
Apr-24-25	J. Trinh	Prepare draft PPSA discharge relating to Non-RBC syndicate liens relating to sale 112;	0.20
Apr-24-25	J. Trinh	Attend to MTO VIN searches in respect of two VINs; receive results and providing report with respect to same;	0.30
Apr-24-25	J. Trinh	Attend to registration PPSA discharges relating to Non-RBC syndicate liens relating to sale 125; receive and review verification of same;	0.10
Apr-24-25	J. Trinh	Attend to registration PPSA discharges relating to Non-RBC syndicate liens relating to sale 117; receive and review confirmation/verification of same;	0.40
Apr-24-25	J. Trinh	Prepare draft PPSA discharge relating to Non-RBC syndicate liens relating to sale 113;	0.10
Apr-24-25	T. Li	Review of due diligence searches, draft discharges and lien summaries; correspondence and calls with working group regarding ongoing vehicle sales and MTO searches;	1.30
Apr-24-25	H. Dylewski	Attend to the registration of PPSA financing statements pertaining sale 22(A); receive confirmation/verification statement of same; provide report with respect to same;	1.00
Apr-24-25	E. Curtis	Review searches for potential sale notices; reporting to A&M for sale 120, 121, 122 and 117;	1.00
Apr-24-25	E. Curtis	Review active sale bring down for sale no. 111, 120, 125 and 121;	1.30
Apr-24-25	E. Hyderman	Review endorsement in connection with April 23 hearing;	0.20
Apr-24-25	A. Glover	Review draft discharges for sale 125; review draft discharges on sale 22(A); review bringdown searches and	4.00

Date	Name	Description	Hours
		report on same to A&M for sale 117; review bringdown searches and report on same to A&M for sale 125; review bringdown searches and report on same to A&M for sale 122; review initial searches for sales 114, 116 and 126 and report to T. Li and order draft discharges in respect of same;	
Apr-24-25	T. Konechny	Attend to filing Alberta, BC, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 022(A);	0.30
Apr-24-25	A. Slota	Attend to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtain and review searches;	0.20
Apr-24-25	A. Slota	Attend to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtain and review searches;	0.20
Apr-24-25	A. Slota	Attend to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of one VIN; obtain and review searches;	0.20
Apr-24-25	A. Slota	Attend to ongoing Ontario, Manitoba and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtain and review searches;	0.30
Apr-24-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.10
Apr-24-25	A. Slota	Attend to ongoing Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; obtain and review searches;	0.30
Apr-24-25	A. Slota	Attend to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtain and review searches;	0.20
Apr-24-25	A. Slota	Attend to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of one VIN; obtain and review searches;	0.30
Apr-24-25	A. Slota	Attend to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; obtain and review searches;	0.30
Apr-24-25	A. Slota	Attend to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of four VINs; obtain and review searches;	0.30
Apr-24-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of three VINs; conduct searches;	0.30
Apr-24-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of the following: 1XKYD49XXRJ346518; obtain and review search results, further to same;	0.10
Apr-24-25	A. Slota	Attend to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of two VINs; obtain and review searches;	0.50
Apr-24-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search	0.10

Date	Name	Description	Hours
		request matters in respect of one VIN; obtain and review search results;	
Apr-24-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conduct searches;	0.20
Apr-24-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.10
Apr-24-25	A. Slota	Attend to ongoing Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of one VIN; obtain and review searches;	0.20
Apr-24-25	A. Slota	Attend to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of four VINs; conduct, obtain and review initial searches;	0.70
Apr-24-25	A. Slota	Attend to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of three VINs; conduct, obtain and review initial searches;	0.80
Apr-24-25	A. Slota	Attend to ongoing Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of one VIN; obtain and review searches;	0.30
Apr-24-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conduct searches;	0.20
Apr-25-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 074;	0.40
Apr-25-25	J. Noel	Discussions with K. Seo regarding file administration; review lien releases and sale notices;	0.90
Apr-25-25	T. Li	Review of due diligence searches, draft discharges and lien summaries; revise and finalize reporting to client in respect of Alberta seizure and judgment liens; correspondence and calls with working group regarding ongoing vehicle sales and MTO searches;	1.10
Apr-25-25	K. Seo	Update tracking documents;	1.30
Apr-25-25	J. Trinh	Prepare draft PPSA discharge relating to Non-RBC syndicate liens relating to sale 126;	0.20
Apr-25-25	J. Trinh	Prepare draft PPSA discharge relating to Non-RBC syndicate liens relating to sale 114;	0.30
Apr-25-25	J. Trinh	Prepare draft PPSA discharge relating to Non-RBC syndicate liens relating to sale 116;	0.20
Apr-25-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review correspondence from client regarding vehicle sales and lien discharges;	0.70
Apr-25-25	A. Glover	Request additional discharges in respect of sale 111 and review correspondence regarding same;	0.30
Apr-25-25	E. Curtis	Review of sale notices 115 and 074, 22(A) bringdowns;	1.50
Apr-25-25	T. Konechny	Attend to drafting Alberta PPSA amendment and discharge in respect of sale 111 for non-RBC liens;	0.40

Date	Name	Description	Hours
Apr-25-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 115;	0.40
Apr-25-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of three VINs; obtain and review search results;	0.30
Apr-25-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.20
Apr-25-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of one VIN; obtain and review search results;	0.20
Apr-25-25	N. Levine	Prepare documents for client; work on Walmart issues;	0.60
Apr-25-25	A. Slota	Attend to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of four VINs; obtain and review searches;	0.30
Apr-25-25	A. Slota	Attend to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of three VINs; obtain and review searches;	0.80
Apr-28-25	J. Noel	Review draft PPSA discharges;	0.30
Apr-28-25	T. Li	Review of due diligence searches, draft discharges and lien summaries; review and consider court orders in light of specialized liens against certain collateral; correspondence and calls with working group regarding ongoing vehicle sales and MTO searches;	1.20
Apr-28-25	E. Curtis	Review draft discharges sale 111; update internal tracker; review searches for sale 128;	1.10
Apr-28-25	K. Seo	Update tracking documents; review PPSA searches;	0.70
Apr-28-25	J. Trinh	Attend to MTO VIN search in respect of two VINs;	0.30
Apr-28-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	0.80
Apr-28-25	H. Dylewski	Prepare draft PPSA discharge financing statements relating to RBC syndicate liens pertaining sale 128; attend to the registration of financing statements; receive confirmations/verification statements of same;	1.10
Apr-28-25	A. Glover	Report to T. Li on sales 127, 128 and 129; review draft discharges for sale 111;	1.70
Apr-28-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review search results;	0.30
Apr-28-25	A. Slota	Attend to British Columbia PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review search results;	0.30
Apr-28-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of three VINs; conduct searches;	0.30
Apr-28-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of one VIN; conduct, obtain and review	0.30

Date	Name	Description	Hours
		search results;	
Apr-28-25	T. Konechny	Attend to drafting British Columbia PPSA discharge in respect of sale 102(A); filing same;	0.20
Apr-28-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 128;	0.60
Apr-28-25	N. Levine	Emails regarding Walmart; emails regarding lien discharges;	0.20
Apr-29-25	J. Noel	Review draft PPSA discharges;	0.20
Apr-29-25	T. Li	Review of draft lien discharges and search summaries; review of orders; correspondence with Calgary lending and insolvency specialists in respect of certain enforcement and workers' compensation liens; correspondence with E. Curtis in respect of Quebec matters and review of Quebec power of attorney;	1.30
Apr-29-25	E. Curtis	Attend to Special Request 017; review and correspondence with client regarding sale 128;	5.50
Apr-29-25	K. Seo	Manage file matters; facilitate and review searches;	4.20
Apr-29-25	J. Trinh	Attend to matters pertaining to AB PPSA discharge of seizure and execution under the PPR pertaining to sale 111;	0.30
Apr-29-25	H. Dylewski	Prepare draft PPSA discharge financing statement relating to non-RBC syndicate liens pertaining sale 129;	0.20
Apr-29-25	H. Dylewski	Prepare draft PPSA discharge financing statement relating to non-syndicate liens pertaining sale 128;	0.20
Apr-29-25	H. Dylewski	Continue receiving confirmations/verification statements relating to RBC syndicate liens pertaining sale 128; provide report with respect to same;	0.50
Apr-29-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; correspondence with client regarding lien discharges;	3.70
Apr-29-25	M. Clarkson-Maciel	Consideration of next steps regarding mailing of notice letter to SBTC Transport;	0.30
Apr-29-25	H. Dylewski	Attend to the registration of financing statements pertaining to sale 111; receive confirmations/verification statements of same; correspondence with working group with respect to same;	0.40
Apr-29-25	A. Glover	Internal working group call in respect of writ of enforcement liens to be discharged for sale 111; review searches for sales 131 and 132 and report to T. Li on same; order draft discharges for sales 131 and 132; correspondence with A&M;	1.90
Apr-29-25	J. Oliver	Review background; draft emails to and review e-mails from T. Li regarding priority matters;	0.40
Apr-29-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of three VINs; obtain and review search results;	0.30
Apr-29-25	A. Slota	Attend to Ontario PPSA VIN due diligence search request matters in respect of three VINs; conduct searches;	0.30

Date	Name	Description	Hours
Apr-29-25	A. Slota	Attend to PPSA VIN due diligence search request matters (all provinces, save for Quebec) in respect of one VIN; conduct, obtain and review all search results;	1.80
Apr-29-25	N. Levine	Discuss Walmart update with client; respond to lien questions;	0.20
Apr-30-25	T. Li	Review of draft lien discharges and search summaries; review of orders; correspondence with Calgary lending and insolvency specialists in respect of certain enforcement and workers' compensation liens;	0.90
Apr-30-25	K. Seo	Facilitate and review searches;	2.00
Apr-30-25	E. Curtis	Review searching and draft discharges;	0.20
Apr-30-25	J. Trinh	Prepare draft PPSA discharge financing statements with respect to non-RBC syndicate liens in respect of sale 130;	0.20
Apr-30-25	J. Trinh	Prepare draft PPSA discharge financing statements with respect to non-RBC syndicate liens in respect of sale 134;	0.20
Apr-30-25	J. Trinh	Prepare draft PPSA discharge financing statements with respect to non-RBC syndicate liens in respect of sale 132;	0.20
Apr-30-25	J. Trinh	Prepare draft PPSA discharge financing statements with respect to non-RBC syndicate liens in respect of sale 135;	0.20
Apr-30-25	J. Trinh	Prepare draft PPSA discharge financing statements with respect to non-RBC syndicate liens in respect of sale 131;	0.20
Apr-30-25	J. Trinh	Prepare draft PPSA discharge financing statements with respect to non-RBC syndicate liens in respect of sale 136;	0.20
Apr-30-25	C. Potter	Matters regarding discharges and correspondence regarding the same;	0.40
Apr-30-25	H. Dylewski	Attend to the registration of PPSA financing statements pertaining to sale 128; receive confirmations/verification statements of same; correspondence with working group with respect to same;	0.50
Apr-30-25	H. Dylewski	Receive and review Ontario PPSA verification statements relating to sale 111;	0.20
Apr-30-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; correspondence with client regarding lien discharges;	2.10
Apr-30-25	E. Hyderman	Preliminary review of materials served in connection with June 4, 2025, hearing;	0.20
Apr-30-25	A. Glover	Report to A&M on sale 128; internal working group discussion regarding sale 133;	0.60
Apr-30-25	A. Slota	Attend to ongoing Ontario PPSA VIN due diligence search request matters in respect of three VINs; obtain and review all search results;	0.30
Apr-30-25	A. Slota	Attend to (AB, SK, MB, NB, NS, NL and PEI) PPSA VIN due diligence search request matters in respect of the following: 1GR1A0623PK519722, 3AKJHHR1KSKC5493, 2M5921611P1209770 and 3H3V532K1PJ420207; conduct, obtain and review all search results, further to same;	2.80

Date	Name	Description	Hours
Apr-30-25	A. Slota	Attend to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of four VINs; conduct, obtain and review initial search results;	1.20
Apr-30-25	N. Levine	Correspond with client regarding liens;	0.20
Apr-30-25	S. Kukulowicz	Review of the Syndicate's responding motion record;	0.40
Apr-30-25	M. Clarkson-Maciel	Call with S. Thaper regarding vehicle owned by SBTC Transport that was collected by manager; correspondence on the same;	0.60

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Potter, Carla	Partner	1.90	840.00	1,596.00
Oliver, Jeffrey	Partner	0.40	1,000.00	400.00
Levine, Natalie	Partner	9.40	1,025.00	9,635.00
Kukulowicz, Shayne	Partner	2.60	1,650.00	4,290.00
Noel, J'Davia	Associate	33.70	525.00	17,692.50
Li, Timon	Associate	30.00	550.00	16,500.00
Curtis, Erin	Associate	46.80	500.00	23,400.00
Seo, Kevin	Associate	33.80	500.00	16,900.00
Rothery, Shae	Associate	44.00	500.00	22,000.00
Clarkson-Maciel, Matteo	Associate	12.00	700.00	8,400.00
Glover, Anna	Associate	39.40	500.00	19,700.00
Hyderman, Eva	Associate	0.90	500.00	450.00
Konechny, Tiffany	Law Clerk / Paralegal	17.90	450.00	8,055.00
Trinh, Julia	Law Clerk / Paralegal	15.40	500.00	7,700.00
Dylewski, Hannah	Law Clerk / Paralegal	27.80	400.00	11,120.00
Fetahu, Edona	Law Clerk / Paralegal	0.20	345.00	69.00
Slota, Alex	Law Clerk / Paralegal	62.60	450.00	28,170.00
TOTAL (CAD)		378.80		196,077.50

Our Fees 196,077.50

Less Discount (19,607.75)

Total Fees 176,469.75

HST @ 13.00% 22,941.07

TOTAL FEES & TAXES (CAD) 199,410.82

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

Electronic Due Diligence	3,415.75
PPSA - Registration/Applic./Discharges	3,514.00
BC Online - PPSA Search/Registrations	437.00
Driver's License Searches	56.00
Agency Fees and Disbursements	14.95
Corporate Filings	528.00
Total Non-Taxable Disbursements	7,965.70

Taxable Disbursements

PPSA - Registration/Applic./Discharges	15,175.20
Electronic Due Diligence	6,512.00
Delivery	110.88
Agency Fees and Disbursements	13,598.55
Total Taxable Disbursements	35,396.63
HST @ 13.00%	4,601.56
Total Taxable Disbursements & Taxes	39,998.19

TOTAL DISBURSEMENTS & TAXES (CAD)	47,963.89
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TOTAL FEES	176,469.75
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TOTAL DISBURSEMENTS	43,362.33
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TOTAL TAXES	27,542.63
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TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	247,374.71
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OUTSTANDING INVOICES

Invoice Number	Invoice Date	Bill Amount	Payments / Credits	Balance Due
2282592	05/26/25	247,374.71	0.00	247,374.71
2282532	05/26/25	238,725.38	0.00	238,725.38
TOTAL (CAD)		486,100.09	0.00	486,100.09



Attn: Douglas McIntosh
Alvarez & Marsal Canada Inc., in its capacity as
Court-Appointed Manager over certain property of
TPine Leasing Capital Corporation et al.
200 Bay Street, Suite 3501
Royal Bank Plaza, South Tower
Toronto, ON M5J 2J1

Invoice No: 2286742
Date: June 30, 2025
Matter No.: 059366-00005
GST/HST No.: R121379572

Lawyer: Kukulowicz, Shayne
Tel.: (416) 860-6463
E-mail: SKukulowicz@cassels.com

Re: Court-appointment as Manager of certain assets of the Pride Group

Fees for professional services rendered up to and including May 31, 2025

Our Fees	133,645.00
Disbursements	30,662.70
Total Fees and Disbursements	164,307.70
HST @ 13.00%	20,361.58
TOTAL DUE (CAD)	184,669.28

We are committed to protecting the environment.

Please provide your email address to payments@cassels.com to receive invoice and reminder statements electronically.

Payment due upon receipt. Please return remittance advice(s) with cheque.

REMITTANCE ADVICE: Email payment details to payments@cassels.com

Canadian Dollar EFT and Wire

Payments:

Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1

Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

Online Bill Payments:

Vendor name is **Cassels Brock Blackwell LLP** and
you are required to enter the first six digits of the
matter #

Invoice No: 2286742
Matter No.: 059366-00005

Amount: **CAD 184,669.28**

e-Transfer Payments: payments@cassels.com

Credit Card Payments: payments.cassels.com

Cassels Brock Blackwell LLP | cassels.com

Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL			
Date	Name	Description	Hours
May-01-25	K. Seo	Managing file administration matters; facilitating and reviewing searches;	1.80
May-01-25	E. Curtis	Reviewing draft discharges in connection with sales 160-161; reviewing sale discharges in connection with Sale 111; corresponding with Quebec counsel regarding sale 55; corresponding with A&M regarding the completion of Sale 22(A);	2.50
May-01-25	T. Li	Review of due diligence searches, draft discharges and lien summaries; meeting with N. Levine in respect of specialized lien against certain Alberta vehicles; correspondence and calls with working group regarding ongoing vehicle sales and MTO searches;	0.60
May-01-25	H. Dylewski	Preparing draft PPSA discharge financing statement relating to non-syndicate liens pertaining Sale 032; attending to the registration of financing statement; receiving confirmation and verification statement of same; Correspondence with working group with respect to same;	0.50
May-01-25	A. Glover	Correspondence in respect of sale 111 and internal working group discussion regarding same; review searches for sale 133;	1.70
May-01-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; correspond with client regarding lien discharges;	1.30
May-01-25	J. Fleisher	Discussion with Timon regarding Quebec repair liens	0.30
May-01-25	N. Levine	Correspondence regarding liens; meet with T. Li;	0.40
May-01-25	J. Oliver	Reviewing background; drafting emails to and reviewing e-mails from T. Li regarding priority matters;	0.40
May-01-25	J. Trinh	Preparing draft PPSA discharge financing statements with respect to non-RBC syndicate liens in respect of Sale 138;	0.20
May-01-25	J. Trinh	Preparing draft PPSA discharge financing statements with respect to non-RBC syndicate liens in respect of Sale 139;	0.40
May-01-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 3 VINs; conducting, obtaining and reviewing initial search results;	0.90
May-01-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
May-01-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 4 VINs; obtaining and reviewing balance of all search results;	0.80
May-01-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and British Columbia PPSA VIN due diligence search request	0.20

Date	Name	Description	Hours
		matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	
May-01-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
May-01-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 3 VINs; conducting searches;	0.30
May-01-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
May-01-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
May-01-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
May-01-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
May-01-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
May-01-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
May-02-25	K. Seo	Managing file administration matters; facilitating and reviewing searches;	2.80
May-02-25	E. Curtis	Reviewing draft discharges; corresponding with Quebec counsel regarding sale 55: review sale 55 discharges and reporting to A&M;	1.70
May-02-25	J. Noel	Review draft PPSA discharge regarding lien releases;	0.10
May-02-25	T. Li	Review of due diligence searches, draft discharges and lien summaries; correspondence with working group in respect of special liens and discharge documentation received from client; attending to other lien discharge and due diligence matters;	1.00
May-02-25	A. Glover	Report on PPSA searches in respect of sale 133; Order draft discharges for sale 133;	0.50
May-02-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; correspond with client	1.80

Date	Name	Description	Hours
		regarding lien discharges;	
May-02-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
May-02-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
May-02-25	A. Slota	Attending to ongoing Ontario, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
May-02-25	A. Slota	Attending to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
May-02-25	A. Slota	Attending to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of VIN; obtaining and reviewing balance of all search results;	0.20
May-02-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
May-02-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 3 VINs; obtaining and reviewing balance of all search results;	0.90
May-02-25	T. Konechny	Attend to drafting Alberta PPSA partial discharge in respect of non-RBC lien for sale 140;	0.20
May-02-25	T. Konechny	Attend to drafting Ontario PPSA partial discharge in respect of non-RBC lien for sale 133;	0.20
May-02-25	N. Levine	Review appellate materials; review variance report;	0.50
May-02-25	C. Potter	Matters regarding PPSA discharge and related matters; correspondence regarding the same;	0.30
May-02-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
May-02-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.10
May-02-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
May-02-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 3 VINs; obtaining and reviewing search results;	0.30
May-02-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
May-02-25	A. Slota	Receiving and reviewing instructions; attending to Ontario	0.20

Date	Name	Description	Hours
		PPSA VIN due diligence search request matters in respect of VIN; conducting searches;	
May-03-25	K. Seo	Managing file administration matters; facilitating and reviewing searches;	0.70
May-03-25	A. Glover	Review searches in respect of sales 141, 142 and 143;	1.30
May-04-25	J. Noel	Review sale notices and potential sale notices;	0.10
May-04-25	E. Curtis	Reviewing draft discharges regarding sale 146 and sale 67;	0.60
May-05-25	K. Seo	Managing file administration matters; facilitating and reviewing searches;	1.70
May-05-25	J. Noel	Review sale notices and potential sale notices;	0.10
May-05-25	T. Li	Review of due diligence searches and lien discharge summaries; review of orders and correspondence with working group in connection with ongoing vehicle sales; extensively review and consider special liens in connection with certain motor vehicle collateral in Alberta and calls and correspondence with Alberta restructuring and litigation specialists regarding same; attending to other lien discharge and security matters;	4.00
May-05-25	A. Glover	Report on sales 141, 142 and 143; review draft discharges for sales 067, 075 and 146; Internal working group discussion regarding worker's compensation board liens;	2.40
May-05-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 067; attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	0.80
May-05-25	H. Dylewski	Preparing draft PPSA discharge financing statement relating to non-syndicate liens pertaining Sale 142;	0.30
May-05-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 075; attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	1.60
May-05-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to non-syndicate liens pertaining Sale 146; attending to the registration of PPSA financing statements; receiving confirmations and verification statements of same; Correspondence with working group with respect to same;	1.20
May-05-25	H. Dylewski	Attending to the registration of PPSA financing statement pertaining to Sale 067; receiving verification statement of same; correspondence with working group with respect to same;	0.20
May-05-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; Instruct law clerks to prepare and file lien discharges; correspond with client regarding lien discharges;	2.50

Date	Name	Description	Hours
May-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
May-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 3 VINs; conducting searches;	0.30
May-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 2 VINs; conducting searches;	0.20
May-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of 3 VINs; conducting, obtaining and reviewing initial search results;	0.60
May-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches, further to same;	0.20
May-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
May-05-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.10
May-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 2 VINs; conducting, obtaining and reviewing initial search results;	0.40
May-05-25	A. Slota	Attending to ongoing Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
May-05-25	T. Konechny	Attend to drafting PPSA partial discharges and discharges for sale 141 as to non-RBC liens;	0.40
May-05-25	N. Levine	Review Mitsubishi materials; correspondence regarding liens; calls with Cassels team and client; correspondence regarding Walmart;	0.90
May-05-25	J. Oliver	Drafting emails to and reviewing e-mails from T. Li regarding WCB, judgment and enforcement matters in Alberta;	0.30
May-05-25	J. Trinh	Attending to registration of PPSA discharge financing statements with respect to non-RBC syndicate liens in respect of Sale 075; receiving and reviewing confirmation/verification of Ontario PPSA partial discharge; Correspondence with working group with respect to MB PPSA partial discharge of reg. no. 202105576805; attending to MB PPSA search in respect of reg. no. 202105576805; receiving and reviewing search result; Preparing draft MB PPSA discharge financing statement; attending to registration of same; receiving and reviewing MB PPSA confirmation;	0.50

Date	Name	Description	Hours
May-05-25	J. Trinh	Attending to preparation and registration of PPSA discharges relating to RBC syndicate liens relating to sale 146; receiving and reviewing confirmation/verification statements;	1.00
May-06-25	K. Seo	Managing file administration matters; facilitating and reviewing searches;	1.00
May-06-25	J. Noel	Review PPSA searches regarding lien releases;	2.00
May-06-25	T. Li	Review of lien discharge summaries and related searches; correspondence with working group in respect of ongoing sales; review of orders and attending to related discharge and security matters;	0.80
May-06-25	A. Glover	Review searches in respect of sales 145 and 148; Report of on sale 148 to T. Li; review bringdown searches for sale 146; Report to A&M on sale 146;	2.70
May-06-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; Instruct law clerks to prepare and file lien discharges; correspond with client regarding lien discharges; correspond with Quebec agents regarding lien discharges;	2.30
May-06-25	A. Slota	Attending to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
May-06-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
May-06-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
May-06-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 2 VINs; obtaining and reviewing balance of all search results;	0.30
May-06-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 3 VINs; obtaining and reviewing search results;	0.30
May-06-25	A. Slota	Attending to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of 3 VIN; conducting, obtaining and reviewing balance of all search results;	0.60
May-06-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
May-06-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 2 VINs; obtaining and reviewing search results;	0.20
May-06-25	T. Konechny	Attend to drafting British Columbia PPSA partial discharge and discharge in respect of sale 144 as to non-RBC liens;	0.20

Date	Name	Description	Hours
May-07-25	J. Noel	Review PPSA searches regarding lien releases;	0.20
May-07-25	K. Seo	Managing file administration matters; facilitating and reviewing searches;	0.70
May-07-25	J. Trinh	Preparing draft PPSA discharge financing statements with respect to non-RBC syndicate liens in respect of Sale 156;	0.20
May-07-25	T. Li	Review of lien discharge summaries and related searches; correspondence with working group in respect of ongoing sales; call with M. Clarkson-Maciel in respect of lien and security structure in respect of certain original collateral; correspondence with clerks and Alberta specialists in respect of special liens and reporting to client on same;	2.40
May-07-25	H. Dylewski	Preparing draft PPSA discharge financing statement relating to non-syndicate liens pertaining Sale 152;	0.20
May-07-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to non-syndicate liens pertaining Sale 158;	0.20
May-07-25	H. Dylewski	Preparing draft PPSA discharge financing statement relating to non-syndicate liens pertaining Sale 150;	0.20
May-07-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 048; attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	0.70
May-07-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 049; attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	0.70
May-07-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to non-syndicate liens pertaining Sale 149;	0.50
May-07-25	M. Clarkson-Maciel	Analysis of Syndicate Collateral Management Order and related turnover orders regarding Manager powers in context of proposed sales of specific VINs;	4.60
May-07-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; Instruct law clerks to prepare and file lien discharges;	2.30
May-07-25	A. Glover	Internal working group discussion regarding duplicated VIN across sales; Report to T. Li on sale 145 and order draft discharges regarding same;	0.90
May-07-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
May-07-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
May-07-25	A. Slota	Receiving and reviewing instructions; attending to Ontario	0.20

Date	Name	Description	Hours
		and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	
May-07-25	T. Konechny	Attend to drafting and filing Alberta, BC, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 049;	0.30
May-07-25	T. Konechny	Attend to drafting and filing Alberta, BC, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 048;	0.30
May-07-25	N. Levine	Call with client; draft email to Walmart and Canada Cartage; supervise research on sale issue;	0.90
May-08-25	K. Seo	Managing file administration matters; facilitating and reviewing searches;	0.70
May-08-25	J. Noel	Discussions with Cassels team regarding sale of Ryson; review PPSA rules regarding change of debtor.	1.00
May-08-25	J. Trinh	Correspondence with working group with respect to drafting non-RBC syndicate lien PPSA discharge financing statement in respect of sale 130 and inability to do so with respect to WCB registrations;	0.20
May-08-25	T. Li	Review of due diligence searches and lien discharge summaries; review of orders and correspondence with working group in connection with ongoing vehicle sales; calls with client in respect of Ryson sale matters and coordinate and review due diligence searches pertaining to certain Ryson sales; correspondence with M. Clarkson-Maciel and N. Levine in respect of sale of Ryson and consider implications on PPSA registrations; attending to other lien discharge and security matters;	2.30
May-08-25	A. Glover	Review bringdown searches for sale 048; report to A&M in respect of sale 048;	0.70
May-08-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to non-syndicate liens pertaining Sale 161;	0.40
May-08-25	H. Dylewski	Preparing draft PPSA discharge financing statement relating to non-syndicate liens pertaining Sale 159;	0.20
May-08-25	H. Dylewski	Preparing draft PPSA discharge financing statement relating to non-syndicate liens pertaining Sale 160;	0.20
May-08-25	H. Dylewski	Preparing draft PPSA discharge financing statement relating to non-syndicate liens pertaining Sale 145;	0.30
May-08-25	H. Dylewski	Preparing draft PPSA discharge financing statement relating to non-syndicate liens pertaining Sale 165;	0.20
May-08-25	M. Clarkson-Maciel	Drafting memo regarding analysis of order for third party asset sales; call with N. Levine regarding the same; analysis of amendment to Ryson dealer agreement as a result of Ryson sale; consideration of effect on PPSA registration with finance team;	3.30
May-08-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 154; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.70

Date	Name	Description	Hours
May-08-25	Im, Anita	Providing report of same; Receiving and reviewing instructions; attending to corporate [REDACTED]; obtaining copies of corporate documents; reviewing search results and preparing report with respect to same; email correspondence with working group;	0.60
May-08-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; Instruct law clerks to prepare and file lien discharges; correspond with client regarding lien discharges; correspond with Quebec agents regarding lien discharges; Discussion with N. Levine and T. Li regarding estimated discharge cost per vehicle sold in March 2025; review correspondence from N. Levine and T. Li [REDACTED];	4.20
May-08-25	T. Konechny	Attend to drafting and filing Alberta, BC, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 154;	0.30
May-08-25	T. Konechny	Attend to matters relating to non-RBC discharges in respect of sale 130;	0.20
May-08-25	A. Slota	Attending to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
May-08-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
May-08-25	N. Levine	Emails regarding discharges; review order to respond to client questions; call with S. Kukulowicz; revise email to monitor; address PSMI matters; calls with client regarding same;	1.60
May-08-25	C. Potter	Matters regarding revised Dealer Agreement issues; correspondence regarding consignment relationship relating to the same; matters regarding PPSA discharge matters;	0.60
May-08-25	S. Kukulowicz	Office conference with N. Levine regarding allocation issues;	0.20
May-08-25	A. Slota	Attending to ongoing Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
May-09-25	K. Seo	Managing file administration matters; facilitating and reviewing searches;	0.60
May-09-25	J. Noel	Review sale notices and potential sale notices;	0.20
May-09-25	T. Li	Review of due diligence searches and lien discharge summaries; review of orders and correspondence with working group in connection with ongoing vehicle sales; attending to other lien discharge and security matters;	1.20
May-09-25	S. Rothery	Attend to PPSA matters; update internal status tracking	0.30

Date	Name	Description	Hours
		sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; correspond with client regarding lien discharges;	
May-09-25	J. Fleisher	Respond to Timon regarding double plated trucks;	0.30
May-09-25	N. Levine	Calls regarding overlapping registrations; correspondence regarding discharges;	0.30
May-09-25	C. Potter	Matters regarding issues with double vin registrations; correspondence regarding the same;	0.40
May-09-25	A. Slota	Attending to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
May-09-25	A. Slota	Receiving and reviewing instructions; attending to urgent Ontario and British Columbia corporate and PPSA due diligence request matters in respect of Ryson Trailer Sales Inc.; obtaining copies of corporate documents; reviewing search results and preparing summary report with respect to same;	0.70
May-12-25	K. Seo	Managing file administration matters; facilitating and reviewing searches;	1.10
May-12-25	E. Curtis	Reviewing Sale 55; reviewing sale 48, 49;	0.50
May-12-25	T. Li	Review of due diligence searches and lien discharge summaries; review of orders and correspondence with working group in connection with ongoing vehicle sales; attending to other lien discharge and security matters;	1.00
May-12-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 099; attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	1.00
May-12-25	H. Dylewski	Attending to the registration of PPSA discharge financing statements relating to non-syndicate liens pertaining Sale 165; receiving confirmations and verification statements of same; Correspondence with working group with respect to same;	0.40
May-12-25	A. Glover	Review draft discharges in respect of sales 099 and 165;	0.40
May-12-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; correspond with client regarding lien discharges;	0.90
May-12-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
May-12-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
May-12-25	N. Levine	Call regarding outstanding discharge issues;	0.30
May-12-25	J. Trinh	Attending to registration of PPSA discharge financing	0.20

Date	Name	Description	Hours
		statement with respect to non-RBC syndicate liens in respect of Sale 099; receiving and reviewing confirmation/verification of same;	
May-12-25	J. Trinh	Attending to preparation and registration of PPSA discharges relating to RBC syndicate liens relating to sale 165; receiving and reviewing confirmation/verification statements;	0.90
May-12-25	J. Trinh	Regarding-drafting PPSA discharge financing statement with respect to non-RBC syndicate lien in respect of Sale 095 as a complete discharge as a result of partial discharge relating to Sale 099 (only two VINS on registration and other VIN has now been discharged;	0.20
May-12-25	S. Kukulowicz	Review of Monitor's Third Report regarding stay extension and distribution;	0.30
May-13-25	K. Seo	Managing file administration matters; facilitating and reviewing searches;	3.00
May-13-25	E. Curtis	Reviewing draft discharges;	0.90
May-13-25	T. Li	Review of due diligence searches and lien discharge summaries; review of orders and correspondence with working group in connection with ongoing vehicle sales; attending to other lien discharge and security matters;	1.00
May-13-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 095; attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	0.80
May-13-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 072; attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	0.80
May-13-25	A. Glover	Review discharges in respect of sale 095; Internal working group discussion in respect of updated approach to special liens; review sale notices provided by B. Wei;	0.90
May-13-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; Instruct law clerks to prepare and file lien discharges; correspond with client regarding lien discharges; correspond with Quebec agents regarding lien discharges;	2.20
May-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
May-13-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
May-13-25	T. Konechny	Attend to drafting and filing PPSA discharges in respect of sale 022(C);	0.50

Date	Name	Description	Hours
May-13-25	T. Konechny	Attend to filing non-RBC PPSA discharges in respect of sale 158;	0.20
May-13-25	T. Konechny	Attend to drafting and filing PPSA discharges in respect of sale 151;	1.00
May-13-25	T. Konechny	Attend to drafting and filing PPSA discharges in respect of sale 158;	0.50
May-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 3 VINs; conducting, obtaining and reviewing initial search results;	0.90
May-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
May-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
May-13-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
May-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
May-13-25	N. Levine	Call with client; address dealer issues;	0.60
May-13-25	J. Trinh	attending to registration of PPSA discharge financing statement with respect to non-RBC syndicate lien in respect of Sale 095; receiving and reviewing PPSA confirmation/verification statement;	0.20
May-13-25	J. Trinh	Attending to preparation and registration of PPSA discharges relating to RBC syndicate liens relating to sale 157; receiving and reviewing confirmation/verification statements;	0.80
May-13-25	C. Potter	Matters regarding PPSA discharge items and review correspondence regarding the same;	0.30
May-14-25	K. Seo	Managing file administration matters; facilitating and reviewing searches;	1.70
May-14-25	J. Trinh	Attending to Ministry of Transportation VIN searches in respect of 13 VINs and providing report with respect to same;	0.60
May-14-25	J. Noel	Discussions with Cassels team regarding lien releases.	1.30
May-14-25	T. Li	Review of due diligence searches and lien discharge summaries; correspondence with client and working group in respect of [REDACTED]; attending to other lien discharge and security matters;	1.50
May-14-25	H. Dylewski	Preparing draft PPSA discharge financing statements	0.70

Date	Name	Description	Hours
		relating to RBC syndicate liens pertaining Sale 147; attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	
May-14-25	M. Clarkson-Maciel	Considering assignment of dealership agreements;	0.20
May-14-25	A. Glover	Internal working group discussion regarding discharge of third party liens; review correspondence regarding sale notices;	0.30
May-14-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; Instruct law clerks to prepare and file lien discharges; correspond with client regarding lien discharges; correspond with Quebec agents regarding lien discharges; Discussion with T. Li regarding title searches against [REDACTED];	2.60
May-14-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
May-14-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 3 VINs; obtaining and reviewing balance of all search results;	0.90
May-14-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
May-14-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
May-14-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
May-14-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, British Columbia and Alberta PPSA VIN due diligence search request matters in respect of 4 VINs; conducting, obtaining and reviewing initial search results;	1.20
May-14-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
May-14-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
May-14-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
May-14-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of	0.30

Date	Name	Description	Hours
May-14-25	T. Konechny	1 VIN; obtaining and reviewing balance of all search results;	0.40
May-14-25	N. Levine	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA discharges in respect of sale 147;	1.00
May-15-25	K. Seo	Address dealer issues; correspondence regarding additional searches and potential actions; confer with client;	2.40
May-15-25	E. Curtis	Managing file administration matters; facilitating and reviewing searches;	1.00
May-15-25	J. Noel	Reviewing sale notice regarding special request 017 and sale tiger 145; Internal meeting to discuss changes in process of reviewing documents;	0.60
May-15-25	T. Li	Discussions with Cassels team regarding lien releases.	1.80
May-15-25	H. Dylewski	Review of various lien discharge summaries; review of MTO searches and correspondence with working group and client regarding ongoing sale matters; review of orders and review of bring-down due diligence searches in respect of Canadian Western Bank discharges;	0.80
May-15-25	A. Glover	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 145; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.50
May-15-25	S. Rothery	Internal working group call regarding discharge of CWB lien; review correspondence regarding potential sale notices and actual sale notices;	2.80
May-15-25	A. Slota	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; Instruct law clerks to prepare and file lien discharges; Discussion with internal working group regarding lien discharge procedure;	0.20
May-15-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
May-15-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
May-15-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.30
May-15-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 3 VINs; conducting searches;	0.20
May-15-25	A. Slota	Attending to ongoing Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	1.20
May-15-25	A. Slota	Attending to ongoing Ontario, British Columbia and Alberta PPSA VIN due diligence search request matters in respect of 4 VINs; obtaining and reviewing balance of all search results;	

Date	Name	Description	Hours
May-15-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA discharges in respect of sale 145;	0.60
May-15-25	N. Levine	Review motion record;	0.20
May-15-25	S. Kukulowicz	Review of motion record of Applicants regarding vesting orders for specific properties;	0.40
May-16-25	E. Curtis	Reviewing PPSA results regarding active sale notice;	0.50
May-16-25	K. Seo	Managing file administration matters; facilitating and reviewing searches;	1.20
May-16-25	J. Noel	Review PPSA search results regarding lien releases; Discussions with T. Li regarding PPSA search results;	0.50
May-16-25	T. Li	Review of PPSA searches; correspondence and calls with working group in respect of lien discharges and additional due diligence searches requested; review of lien discharge summaries;	1.20
May-16-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 107(A); attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	0.70
May-16-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 096; attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	0.70
May-16-25	A. Glover	Review correspondence in respect of potential sales and sale notices;	0.10
May-16-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	0.40
May-16-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA discharges in respect of sale 096;	0.40
May-16-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA discharges in respect of sale 107(A);	0.40
May-16-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta, Manitoba and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.40
May-16-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 3 VINs; obtaining and reviewing search results;	0.30
May-16-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Manitoba and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
May-16-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN search matters in respect of 1 VIN; conducting searches;	0.20

Date	Name	Description	Hours
May-16-25	A. Slota	Receiving and reviewing instructions; attending to PPSA VIN search matters in all provinces (save for Quebec) in respect of 7 VINs; conducting, obtaining and reviewing search results;	6.00
May-16-25	S. Kukulowicz	Review of the Monitor's 6th Report;	0.30
May-19-25	N. Levine	Correspondence regarding hearing;	0.10
May-19-25	M. Clarkson-Maciel	Review of court filings, consideration as to effect on manager; correspondence on the same;	0.80
May-20-25	A. Slota	Attending to ongoing Ontario PPSA VIN search matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
May-20-25	A. Slota	Attending to ongoing Ontario, Alberta, Manitoba and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.40
May-20-25	A. Slota	Attending to ongoing Ontario, Manitoba and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
May-21-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA discharges in respect of sale 143;	0.40
May-21-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.30
May-21-25	E. Curtis	Reviewing current sales 142 and 162;	0.30
May-21-25	T. Li	Review of draft discharges and due diligence summaries; correspondence with working group regarding ongoing sale matters and changes to certain asset batches;	0.30
May-21-25	M. Clarkson-Maciel	Drafting letter to Ryson trailers regarding dealer agreement obligations;	1.40
May-21-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 162; attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	0.70
May-21-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 097; attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	0.90
May-21-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 143; attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	0.70
May-21-25	A. Glover	Review correspondence regarding upcoming sale notices;	0.10
May-21-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA discharges in respect of sale 162;	0.40
May-21-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA discharges in respect of sale 097;	0.40
May-21-25	J. Trinh	Attending to Ministry of Transportation VIN searches in	1.40

Date	Name	Description	Hours
		respect of 105 VINs and providing report with respect to same;	
May-21-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 162;	0.20
May-21-25	C. Potter	Matters regarding PPSA discharges and correspondence regarding the same;	0.30
May-21-25	N. Levine	Review application record and monitor's report; consider draft letter and Ryson correspondence;	1.00
May-21-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of 3 VINs; conducting, obtaining and reviewing search results;	0.50
May-21-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
May-22-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.90
May-22-25	E. Curtis	Reviewing bringdown searches in connection with Sale 145; Reviewing bringdowns for sale 96; Reviewing open special requests;	1.10
May-22-25	J. Noel	Review PPSA searches regarding lien releases; review draft PPSA discharges regarding lien releases;	1.10
May-22-25	J. Trinh	Receiving Ontario PPSA VIN searches in respect of Sale 143 and providing report with respect to same;	0.20
May-22-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 141(A);	0.20
May-22-25	J. Trinh	Receiving Ontario PPSA VIN searches in respect of Sale 097 and providing report with respect to same;	0.20
May-22-25	T. Li	Review of draft discharges and due diligence summaries; correspondence with working group regarding ongoing sale matters and changes to certain asset batches;	0.40
May-22-25	M. Clarkson-Maciel	Call with E. Allin and E. Mann regarding [REDACTED], letter to Ryson; conference with N. Levine regarding advice to A&M;	3.20
May-22-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 166; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.60
May-22-25	A. Glover	Review searches in respect of sale 166 and report to T. Li on same; Order discharges in respect of sale 166; review correspondence regarding incoming sale notices and potential sale notices; Report to Pride in connection with incoming financier's lien for sale 166;	1.20
May-22-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; Instruct law clerks to prepare and file lien discharges; correspond with client regarding lien discharges;	2.90
May-22-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 141(A);	0.80

Date	Name	Description	Hours
		attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	
May-22-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA discharges in respect of sale 166;	0.40
May-22-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA discharges in respect of sale 141(A);	0.40
May-22-25	T. Konechny	Attend to drafting Ontario PPSA discharges and partial discharges for non-RBC liens in respect of sale 145; filing Ontario and British Columbia PPSA discharges and partial discharges in respect of same;	0.70
May-22-25	N. Levine	Revise letter and agreement; call with client; revise documents; call to counsel for dealer;	1.60
May-22-25	J. Trinh	Receiving PPSA VIN searches in respect of Sale 162 and providing report with respect to same;	0.20
May-22-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 170;	0.20
May-22-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 166;	0.20
May-22-25	S. Kukulowicz	Telephone attendance with N. Levine regarding Ryson issue; review of draft memo and related emails;	0.60
May-23-25	K. Seo	Attending to administrative matters; updating sale trackers;	2.00
May-23-25	J. Noel	Review sale notices and potential sale notices;	0.20
May-23-25	E. Curtis	Reviewing bringdown searches and draft discharges for open sale notices;	0.80
May-23-25	J. Trinh	Attending to registration of PPSA discharge financing statement with respect to non-RBC syndicate lien in respect of Sale 107(A); receiving and reviewing PPSA confirmation/verification statement;	0.10
May-23-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 112;	0.20
May-23-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 155;	0.20
May-23-25	J. Trinh	Receiving PPSA VIN searches in respect of Sale 170 and providing report with respect to same;	0.20
May-23-25	J. Trinh	Receiving PPSA VIN searches in respect of Sale 141(A) and providing report with respect to same;	0.30
May-23-25	J. Trinh	Receiving PPSA VIN searches in respect of Sale 166 and providing report with respect to same;	0.20
May-23-25	T. Li	Review of draft discharges and due diligence summaries;	0.30
May-23-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 155; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.60
May-23-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 112; attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	0.90
May-23-25	M. Clarkson-Maciel	Conference with N. Levine; amendments to draft	0.90

Date	Name	Description	Hours
		documentation prepared by client; drafting correspondence;	
May-23-25	A. Glover	Review updates to procedure provided by T. Li; review correspondence regarding upcoming sale notices;	0.40
May-23-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; Instruct law clerks to prepare and file lien discharges; correspond with client regarding lien discharges; correspond with Quebec agents regarding lien discharges;	2.00
May-23-25	T. Konechny	Attend to filing Ontario PPSA partial discharge in respect of non-RBC lien for sale 145;	0.10
May-23-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA discharges in respect of sale 155;	0.40
May-23-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA discharges in respect of sale 112;	0.50
May-23-25	N. Levine	Call with client; call with Cassels team; email with Ryson lawyer; revise documents;	1.00
May-23-25	S. Kukulowicz	Telephone attendance with N. Levine regarding Ryson issue; review of related emails;	0.40
May-26-25	E. Curtis	Reviewing bringdown searches regard PPSA sale 22;	0.60
May-26-25	K. Seo	Attending to administrative matters; updating sale trackers;	2.40
May-26-25	M. Clarkson-Maciel	Reviewing draft letter to Ryson;	0.10
May-26-25	E. Hyderman	Correspondence with N. Levine regarding communication with dealers regarding dealer agreements;	0.10
May-26-25	A. Glover	Reviewing bringdown PPSA searches in respect of sales 097 and 143 and summarize hits and report to A&M in respect of same;	1.30
May-26-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; Instruct law clerks to prepare and file lien discharges; correspond with client regarding lien discharges; correspond with Quebec agents regarding lien discharges;	0.50
May-26-25	J. Trinh	Receiving PPSA VIN searches in respect of Sale 155 and providing report with respect to same;	0.20
May-26-25	N. Levine	Emails regarding letter; calls regarding letter and Ryson; revise letter; finalize letter;	1.00
May-26-25	J. Trinh	Receiving PPSA VIN searches in respect of Sale 112 and providing report with respect to same;	0.20
May-26-25	S. Kukulowicz	Review of draft letter to Ryson and discussed same with N. Levine; file administration;	0.90
May-27-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.30
May-27-25	E. Curtis	Reviewing open sales and updating tracking documents;	0.20
May-27-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 173;	0.20
May-27-25	T. Li	Review of lien discharge requests and correspondence with	0.20

Date	Name	Description	Hours
		working group regarding same;	
May-27-25	E. Curtis	Reviewing active sale PPSA searches to confirm clear and reporting to A&M accordingly;	0.30
May-27-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 172;	0.20
May-27-25	A. Glover	Report to A&M in respect of sales 097 and 107(A);	0.70
May-27-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	0.60
May-27-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 022(E);	0.20
May-27-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
May-27-25	N. Levine	Confer with client regarding liens;	0.10
May-27-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 171;	0.20
May-28-25	E. Curtis	Reviewing bringdown searches and open sales;	0.40
May-28-25	K. Seo	Attending to administrative matters; updating sale trackers;	3.20
May-28-25	J. Trinh	Receiving PPSA VIN searches in respect of Sale 022(E) and providing report with respect to same;	0.20
May-28-25	J. Trinh	Attending to preparation and registration of PPSA discharges relating to RBC syndicate liens relating to sale 022(F); receiving and reviewing confirmation/verification statements;	0.80
May-28-25	J. Trinh	Receiving PPSA VIN searches in respect of Sale 171 and providing report with respect to same;	0.20
May-28-25	J. Trinh	Receiving PPSA VIN searches in respect of Sale 172 and providing report with respect to same;	0.20
May-28-25	J. Trinh	Receiving PPSA VIN searches in respect of Sale 173 and providing report with respect to same;	0.20
May-28-25	T. Li	Review of lien discharge requests and ongoing sales; call with client in respect of certain dispositions by Brandt customers and changes to sale batching;	0.60
May-28-25	A. Glover	Review correspondence regarding incoming potential sales and sale notices;	0.20
May-28-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
May-28-25	A. Slota	Attending to ongoing to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
May-28-25	A. Slota	Receiving and reviewing instructions; attending to Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing search results;	0.30
May-28-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
May-28-25	A. Slota	Receiving and reviewing instructions; attending to Ontario	0.20

Date	Name	Description	Hours
		PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	
May-28-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
May-28-25	N. Levine	Call with client regarding open issues including trailers, distributions and upcoming hearings; consider Ryson issues;	0.50
May-29-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.20
May-29-25	E. Curtis	Reviewing bring down searches for sale 175;	0.80
May-29-25	A. Glover	Review correspondence regarding upcoming active sales;	0.10
May-29-25	M. Clarkson-Maciel	Receiving and considering correspondence sent to ryson regarding marketing dealer agreement; reviewing correspondence between monitor and manager regarding schedules;	0.40
May-29-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
May-29-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
May-29-25	N. Levine	Call with S. Brotman; emails with client and Ryson counsel;	0.50
May-29-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
May-29-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
May-29-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
May-29-25	S. Kukulowicz	Review of further correspondence regarding Ryson issue;	0.20
May-30-25	K. Seo	Attending to administrative matters; updating sale trackers;	2.80
May-30-25	J. Trinh	Attending to preparation and registration of PPSA discharges relating to RBC syndicate liens relating to sale 088; receiving and reviewing confirmation/verification statements;	1.60
May-30-25	J. Trinh	Attending to preparation and registration of PPSA discharges relating to RBC syndicate liens relating to sale 114; receiving and reviewing confirmation/verification statements;	2.20
May-30-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 169; attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	0.90
May-30-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 131;	0.90

Date	Name	Description	Hours
		attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	
May-30-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 159;	0.90
		attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	
May-30-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 142;	0.90
		attending to the registration of financing statements; receiving confirmations/verification statements of same; Providing report of same;	
May-30-25	A. Glover	Review correspondence regarding upcoming sale notices;	0.50
May-30-25	Im, Anita	Attending to PPSA searches in respect of Sale 170;	0.30
May-30-25	Im, Anita	Attending to PPSA searches in respect of Sale 159;	0.30
May-30-25	Im, Anita	Attending to ON and SK PPSA searches in respect of Sale 131;	0.30
May-30-25	Im, Anita	Attending to PPSA VIN searches in respect of Sale 169;	0.30
May-30-25	Im, Anita	Attending to PPSA VIN searches in respect of Sale 142;	0.30
May-30-25	Im, Anita	Attending to PPSA VIN searches in respect of Sale 022(E);	0.30
May-30-25	Im, Anita	Attending to PPSA searches in respect of Sale 114;	0.30
May-30-25	N. Levine	Call with client regarding litigation; review lien issues	0.50
May-30-25	J. Trinh	Attending to preparation and registration of PPSA discharges relating to RBC syndicate liens relating to sale 170; receiving and reviewing confirmation/verification statements;	0.80
May-30-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
May-30-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Manitoba and Saskatchewan PPSA VIN due diligence search request matters in respect of 3 VINs; conducting, obtaining and reviewing initial search results;	0.50
May-31-25	T. Li	Review of lien discharge requests and ongoing sale transactions; review of search summaries and due diligence;	0.50

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Fleisher, Jonathan	Partner	0.60	1,190.00	714.00
Levine, Natalie	Partner	13.00	1,025.00	13,325.00
Oliver, Jeffrey	Partner	0.70	1,000.00	700.00
Potter, Carla	Partner	1.90	840.00	1,596.00
Kukulowicz, Shayne	Partner	3.30	1,650.00	5,445.00

Name	Title	Hours	Rate	Amount
Seo, Kevin	Associate	34.50	500.00	17,250.00
Noel, J'Davia	Associate	7.40	525.00	3,885.00
Curtis, Erin	Associate	12.20	500.00	6,100.00
Li, Timon	Associate	21.10	550.00	11,605.00
Glover, Anna	Associate	16.90	500.00	8,450.00
Clarkson-Maciel, Matteo	Associate	14.90	700.00	10,430.00
Hyderman, Eva	Associate	0.10	500.00	50.00
Rothery, Shae	Associate	29.60	500.00	14,800.00
Konechny, Tiffany	Law Clerk / Paralegal	9.80	450.00	4,410.00
Trinh, Julia	Law Clerk / Paralegal	16.80	500.00	8,400.00
Dylewski, Hannah	Law Clerk / Paralegal	23.80	400.00	9,520.00
Im, Anita	Law Clerk / Paralegal	2.70	400.00	1,080.00
Slota, Alex	Law Clerk / Paralegal	35.30	450.00	15,885.00
TOTAL (CAD)		244.60		133,645.00

Our Fees	133,645.00
HST @ 13.00%	17,373.85
TOTAL FEES & TAXES (CAD)	151,018.85

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

Driver's License Searches	1,652.00
PPSA - Registration/Applic./Discharges	3,263.95
Electronic Due Diligence	1,904.25
BC Online - PPSA Search/Registrations	368.00
Corporate Filings	492.00
Total Non-Taxable Disbursements	7,680.20

Taxable Disbursements

PPSA - Registration/Applic./Discharges	13,743.70
Electronic Due Diligence	4,014.00
Agency Fees and Disbursements	5,224.80
Total Taxable Disbursements	22,982.50
HST @ 13.00%	2,987.73
Total Taxable Disbursements & Taxes	25,970.23

TOTAL DISBURSEMENTS & TAXES (CAD)	33,650.43
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Cassels Brock & Blackwell LLP
Alvarez
Re: Court-appointment as Manager of certain assets of the Pride
Group

Page 25 of 25
Invoice No: 2286742
Matter No. 059366-00005

TOTAL FEES	133,645.00
TOTAL DISBURSEMENTS	30,662.70
TOTAL TAXES	20,361.58
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	184,669.28



Attn: Douglas McIntosh
Alvarez & Marsal Canada Inc., in its capacity as
Court-Appointed Manager over certain property of
TPine Leasing Capital Corporation et al.
200 Bay Street, Suite 3501
Royal Bank Plaza, South Tower
Toronto, ON M5J 2J1

Invoice No: 2290147
Date: July 30, 2025
Matter No.: 059366-00005
GST/HST No.: R121379572

Lawyer: Kukulowicz, Shayne
Tel.: (416) 860-6463
E-mail: SKukulowicz@cassels.com

Re: Court-appointment as Manager of certain assets of the Pride Group

Fees for professional services rendered up to and including June 30, 2025

Our Fees	126,454.00
Less 10% discount	(12,645.40)
Total Fees	113,808.60
Disbursements	27,041.45
Total Fees and Disbursements	140,850.05
HST @ 13.00%	17,364.27
TOTAL DUE (CAD)	158,214.32

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Swift Code: NOSCCATT
ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

Online Bill Payments:

Vendor name is **Cassels Brock Blackwell LLP** and
you are required to enter the first six digits of the
matter #

Invoice No: 2290147
Matter No.: 059366-00005

Amount: **CAD 158,214.32**

e-Transfer Payments: payments@cassels.com

Credit Card Payments: payments.cassels.com

Cassels Brock Blackwell LLP | cassels.com

Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL			
Date	Name	Description	Hours
Jun-01-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct law clerks to order PPSA searches;	0.50
Jun-01-25	S. Kukulowicz	Review of emails regarding Ryson issue;	0.20
Jun-01-25	N. Levine	Correspondence regarding potential litigation	0.10
Jun-02-25	E. Curtis	Updating internal tracker; reviewing bringdown searches and active sale notices;	1.50
Jun-02-25	J. Trinh	Attending to preparation and registration of PPSA discharges relating to RBC syndicate liens relating to sale 171; receiving and reviewing confirmation/verification statements;	0.80
Jun-02-25	J. Trinh	Attending to preparation and registration of PPSA discharges relating to RBC syndicate liens relating to sale 022(E); receiving and reviewing confirmation/verification statements;	1.90
Jun-02-25	J. Trinh	Attending to VIN searches in respect of Sale 114 in additional provinces;	0.70
Jun-02-25	J. Trinh	Attending to VIN searches ins respect of Sale 173 in additional provinces and receiving results of same;	0.60
Jun-02-25	J. Trinh	Attending to preparation and registration of PPSA discharges relating to RBC syndicate liens relating to sale 174; receiving and reviewing confirmation/verification statements;	0.80
Jun-02-25	K. Seo	Updating sale trackers;	2.70
Jun-02-25	J. Noel	Review PPSA search results and draft discharges regarding lien releases;	1.30
Jun-02-25	T. Li	Review of discharges and due diligence summaries; correspondence with working group in respect of ongoing sale requests; attending to other due diligence and security release matters;	0.90
Jun-02-25	F. Ebadi	Receiving and reviewing instructions; attending to corporate and security searches with respect to Macrotech Business Solutions Inc.; receiving and reviewing search results and preparing report with respect to same; email correspondence with working group;	0.60
Jun-02-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct law clerks to prepare and file lien discharges; correspond with client regarding lien discharges;	1.80
Jun-02-25	E. Hyderman	Review demand letter regarding Ryson dispute; review correspondence with N. Levine and C. Pendrith regarding same;	0.10
Jun-02-25	Im, Anita	Receiving PPSA VIN searches in respect of Sale 131, and providing report with respect to same;	0.20

Date	Name	Description	Hours
Jun-02-25	Im, Anita	Receiving PPSA VIN searches in respect of Sale 170, and providing report with respect to same;	0.30
Jun-02-25	Im, Anita	Receiving PPSA VIN searches in respect of Sale 169, and providing report with respect to same;	0.30
Jun-02-25	Im, Anita	Receiving PPSA VIN searches in respect of Sale 142, and providing report with respect to same;	0.20
Jun-02-25	M. Clarkson-Maciel	Conference with C. Pendrith and N. Levine regarding Ryson transaction structure and Ryson dealer agreement; reviewing court documentation;	0.70
Jun-02-25	C. Pendrith	Emails and discussion with N. Levine c [REDACTED]; review background documents and consider [REDACTED];	1.10
Jun-02-25	N. Levine	Confer with Cassels team regarding litigation options; correspond with Ryson counsel; correspond with client; emails regarding liens;	0.80
Jun-02-25	S. Kukulowicz	Discussions and review of emails with N. Levine regarding payment direction; review of emails regarding Ryson issue;	0.40
Jun-02-25	A. Slota	Receiving and reviewing instructions; attending to New Brunswick, Nova Scotia, Newfoundland and Labrador, Prince Edward Island and Alberta PPSA VIN due diligence search request matters in respect of 2 VINS; conducting, obtaining and reviewing search results;	1.50
Jun-02-25	A. Slota	Attending to ongoing Ontario, Manitoba and Saskatchewan PPSA VIN due diligence search request matters in respect of 3 VINS; obtaining and reviewing balance of all search results;	0.50
Jun-02-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 3 VINS; conducting searches;	0.30
Jun-02-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Jun-02-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Jun-03-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.20
Jun-03-25	E. Curtis	Reviewing active sale notices searches;	2.00
Jun-03-25	J. Noel	Review draft PPSA registrations and PPSA searches regarding lien releases;	0.70
Jun-03-25	C. Potter	Matters regarding PPSA discharges and review of correspondence with respect to the same;	0.30
Jun-03-25	T. Li	Review of discharges and due diligence summaries; correspondence with working group in respect of ongoing sale requests; review of orders in respect of lease buyout transactions; attending to other due diligence and security release matters;	1.40
Jun-03-25	M. Clarkson-Maciel	Conference with client regarding Ryson dealer agreement;	0.70

Date	Name	Description	Hours
Jun-03-25	H. Dylewski	discussion with E. Hyderman regarding directions notice; Attending to the registration of PPSA financing statement pertaining to Sale 022(B); receiving confirmation and verification statement of same; correspondence with working group with respect to same;	0.40
Jun-03-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct law clerks to prepare and file lien discharges; correspond with client regarding lien discharges; correspond with Quebec agent regarding lien discharges;	4.60
Jun-03-25	E. Hyderman	Drafting direction; reviewing credit agreement; correspondence with N. Levine regarding same;	2.60
Jun-03-25	Im, Anita	Receiving PPSA VIN searches in respect of Sale 159, and providing report with respect to same;	0.20
Jun-03-25	C. Pendrith	Review background documents; prepare for and attend meeting with A & M team;	0.70
Jun-03-25	N. Levine	Review endorsement; prepare direction; confer with client; confer with counsel to Royal Truck; review proposal;	2.10
Jun-03-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Saskatchewan and Manitoba PPSA VIN due diligence search request matters in respect of 3 VINS; conducting, obtaining and reviewing search results;	0.60
Jun-03-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 4 VINS; conducting, obtaining and reviewing search results;	1.20
Jun-03-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing search results;	0.30
Jun-03-25	T. Konechny	Attend to drafting Ontario PPSA partial discharge for non-RBC lien in respect of sale 112;	0.20
Jun-03-25	T. Konechny	Attend to filing British Columbia PPSA discharge for non-RBC lien in respect of sale 141(A);	0.20
Jun-03-25	S. Kukulowicz	Review of payment and direction and discussed same with N. Levine;	0.20
Jun-03-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 4 VINS; conducting searches;	0.40
Jun-03-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Jun-03-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing search results;	0.20

Date	Name	Description	Hours
Jun-03-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jun-03-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches; further to same;	0.20
Jun-03-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing search results;	0.30
Jun-03-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jun-03-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 3 VINS; obtaining and reviewing search results;	0.30
Jun-03-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 4 VINS; conducting searches;	0.40
Jun-03-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing search results;	0.30
Jun-04-25	K. Seo	Attending to administrative matters; updating sale trackers;	2.50
Jun-04-25	E. Curtis	Reviewing active sale notices and updating tracker;	1.60
Jun-04-25	J. Trinh	Attending to registration of non-RBC syndicate liens in respect of sale 131; receiving and reviewing verification of same;	0.20
Jun-04-25	J. Trinh	Attending to registration of non-RBC syndicate liens in respect of sale 112; receiving and reviewing confirmation/verification of same;	0.30
Jun-04-25	J. Trinh	Preparing draft PPSA discharge financing statements with respect to non-RBC syndicate liens pertaining to Sale 174;	0.30
Jun-04-25	J. Trinh	Receiving PPSA VIN searches in respect of Sale 114 and providing report with respect to same;	0.70
Jun-04-25	J. Noel	Review sale notices and potential sale notices;	0.10
Jun-04-25	T. Li	Review of discharges and due diligence summaries; review of court orders, search tracking and lien release protocol; discussion with insolvency team regarding [REDACTED] and related recovery and PPSA issues; correspondence with working group in respect of ongoing sale requests; attending to other due diligence and security release matters;	1.80
Jun-04-25	H. Dylewski	Attending to the registration of PPSA financing statement pertaining to Sale 159; receiving verification statement of same; correspondence with working group with respect to same;	0.20

Date	Name	Description	Hours
Jun-04-25	H. Dylewski	Attending to the registration of PPSA financing statement pertaining to Sale 142; receiving verification statement of same; correspondence with working group with respect to same;	0.40
Jun-04-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to non-syndicate liens pertaining Sale 170; attending to the registration of PPSA financing statements; receiving confirmation and verification statements of same; correspondence with working group with respect to same;	0.60
Jun-04-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct law clerks to prepare and file lien discharges; correspond with client regarding lien discharges; correspond with Quebec agent regarding lien discharges;	2.10
Jun-04-25	A. Glover	Review correspondence regarding active and potential sale notices;	0.80
Jun-04-25	Im, Anita	Receiving PPSA VIN searches in respect of Sale 022(E), and providing report with respect to same;	0.30
Jun-04-25	Im, Anita	Receiving PPSA VIN searches in respect of Sale 114, and providing report with respect to same;	0.30
Jun-04-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 4 VINS; obtaining and reviewing balance of all search results;	1.20
Jun-04-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 4 VINS; obtaining and reviewing search results;	0.40
Jun-04-25	A. Slota	Receiving and reviewing instructions; attending to Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing search results;	0.30
Jun-04-25	N. Levine	Correspondence regarding liens; confer with Cassels team and client;	0.30
Jun-04-25	A. Slota	Attending to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Jun-04-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 4 VINS; obtaining and reviewing search results;	0.40
Jun-04-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jun-04-25	A. Slota	Attending to ongoing Ontario, Saskatchewan and Manitoba PPSA VIN due diligence search request matters in respect of 3 VINS; obtaining and reviewing balance of all search results;	0.60
Jun-04-25	A. Slota	Attending to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN;	0.20

Date	Name	Description	Hours
Jun-04-25	A. Slota	obtaining and reviewing balance of all search results; Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jun-04-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Jun-04-25	A. Slota	Attending to ongoing Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Jun-05-25	K. Seo	Updating sale trackers;	2.50
Jun-05-25	A. Glover	Review bringdown searches in connection with sale 114;	1.70
Jun-05-25	E. Curtis	Providing discharges to the client;	0.40
Jun-05-25	C. Potter	Matters regarding PPSA discharges and correspondence regarding the same;	0.30
Jun-05-25	T. Li	Review of discharges and due diligence summaries; correspondence with working group in respect of ongoing sale requests; attending to other due diligence and security release matters;	0.80
Jun-05-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 175; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Jun-05-25	H. Dylewski	Attending to the registration of PPSA financing statement pertaining to Sale 22(E); receiving confirmations and verification statements of same; correspondence with working group with respect to same;	0.50
Jun-05-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 148; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.80
Jun-05-25	M. Clarkson-Maciel	Considering next steps regarding Ryson dealer agreement;	0.30
Jun-05-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct law clerks to prepare and file lien discharges; correspond with client regarding lien discharges; correspond with Quebec agent regarding lien discharges;	1.20
Jun-05-25	A. Slota	Attending to ongoing Ontario, Manitoba and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Jun-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing search results;	0.20
Jun-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario	0.20

Date	Name	Description	Hours
		PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	
Jun-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 2 VINS; conducting, obtaining and reviewing search results;	0.40
Jun-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing search results;	0.20
Jun-05-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 175;	0.40
Jun-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing search results;	0.20
Jun-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 3 VINS; conducting, obtaining and reviewing search results;	0.60
Jun-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Manitoba and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing search results;	0.30
Jun-05-25	N. Levine	Emails regarding Ryson issues;	0.10
Jun-06-25	K. Seo	Updating sale trackers;	2.30
Jun-06-25	E. Curtis	Reviewing draft discharges;	0.70
Jun-06-25	J. Trinh	Attending to registration of non-RBC syndicate liens in respect of Sale 114; receiving and reviewing confirmation/verification of same;	0.40
Jun-06-25	J. Noel	Review draft PPSA discharges regarding lien releases;	0.20
Jun-06-25	T. Li	Review of discharges and due diligence summaries; correspondence with working group in respect of ongoing sale requests; attending to other due diligence and security release matters;	0.70
Jun-06-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 183; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.80
Jun-06-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 181; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Jun-06-25	M. Clarkson-Maciel	Ryson dealer agreement dispute;	0.10
Jun-06-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 179; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.60

Date	Name	Description	Hours
		providing report of same;	
Jun-06-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 193; attending to the registration of financing statements;	0.30
Jun-06-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 180; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Jun-06-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct law clerks to prepare and file lien discharges; correspond with client regarding lien discharges;	1.20
Jun-06-25	A. Glover	Review searches in respect of sale 114; review correspondence regarding active sale notices;	1.10
Jun-06-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of the following: 1XKYDP9X0PJ952909; obtaining and reviewing balance of all search results, further to same;	0.20
Jun-06-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jun-06-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, British Columbia and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Jun-06-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, British Columbia and Alberta PPSA VIN due diligence search request matters in respect of 4 VINS; conducting, obtaining and reviewing initial search results;	1.20
Jun-06-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Jun-06-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Jun-06-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 179;	0.40
Jun-06-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 180;	0.40
Jun-06-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 193;	0.40
Jun-06-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 181;	0.40

Date	Name	Description	Hours
Jun-06-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 183;	0.50
Jun-06-25	N. Levine	Correspond with client regarding Ryson; discuss status with Cassels team;	0.30
Jun-07-25	E. Curtis	Reviewing draft discharges;	0.30
Jun-07-25	N. Levine	Review motion record;	0.20
Jun-08-25	A. Glover	Review searches in respect of sales 180 and 175; order draft discharges in respect of sale 180; flag incoming financier's lien in respect of sale 175;	1.00
Jun-08-25	E. Curtis	Reviewing active sales;	0.50
Jun-08-25	S. Kukulowicz	Review of Pride motion materials regarding Phoenix transaction and distribution to Syndicate;	0.40
Jun-09-25	K. Seo	Updating sale trackers;	0.50
Jun-09-25	A. Glover	Correspondence regarding duplication of VINs throughout different sale notices; review and file correspondence in respect of upcoming potential sales and sale notices;	0.80
Jun-09-25	E. Curtis	Reviewing active sale notices;	0.20
Jun-09-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct law clerks to prepare and file lien discharges; correspond with client regarding lien discharges;	1.00
Jun-09-25	E. Hyderman	Review and summarize served motion record; correspondence with Cassels team regarding same;	0.10
Jun-09-25	A. Slota	Attending to ongoing Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Jun-09-25	A. Slota	Attending to ongoing Ontario, British Columbia and Alberta PPSA VIN due diligence search request matters in respect of 4 VINS; obtaining and reviewing balance of all search results; further to same;	1.20
Jun-09-25	T. Konechny	Receive and transmit PPSA discharges in respect of sale 193;	0.10
Jun-09-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 153;	0.70
Jun-09-25	S. Kukulowicz	Review of Monitor's 27th Report;	0.30
Jun-09-25	N. Levine	Review court materials; prepare for meeting with agent; review discharges; emails regarding Ryson;	0.80
Jun-09-25	A. Slota	Attending to ongoing Ontario, British Columbia and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Jun-09-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Jun-09-25	A. Slota	Attending to ongoing Ontario, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of	0.30

Date	Name	Description	Hours
		1 VIN; obtaining and reviewing balance of all search results;	
Jun-10-25	K. Seo	Updating sale trackers;	1.30
Jun-10-25	A. Glover	Review and file correspondence regarding potential sales and sale notices;	0.20
Jun-10-25	E. Curtis	Updating internal tracker;	0.10
Jun-10-25	T. Li	Review of lien summaries; correspondence with client and working group regarding file matters;	0.50
Jun-10-25	M. Clarkson-Maciel	Attending call regarding Ryson dealer agreement;	0.60
Jun-10-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	0.40
Jun-10-25	N. Levine	Prepare for call with client; call with client; consider lien issues; prepare for call with Syndicate counsel;	0.50
Jun-10-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Jun-10-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Jun-10-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, British Columbia and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Jun-10-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Jun-11-25	K. Seo	Updating sale trackers;	3.90
Jun-11-25	E. Curtis	Reviewing active sale notices;	1.80
Jun-11-25	A. Glover	Review draft discharges for sales 180, 181 and 183; report to A&M in respect of sale 179;	1.20
Jun-11-25	J. Noel	Review PPSA search results regarding lien releases;	1.50
Jun-11-25	T. Li	Review of lien summaries; correspondence with client and working group regarding file matters;	0.50
Jun-11-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 176; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.30
Jun-11-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 190; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.50
Jun-11-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 161(A); attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.80

Date	Name	Description	Hours
Jun-11-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 173; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.40
Jun-11-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 81(B); attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Jun-11-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 177; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.50
Jun-11-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 139(A); attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.90
Jun-11-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	0.60
Jun-11-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 173;	0.40
Jun-11-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 176;	0.40
Jun-11-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 081(B);	0.40
Jun-11-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 139(A);	0.50
Jun-11-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 177;	0.40
Jun-11-25	T. Konechny	Attend to drafting Manitoba PPSA partial discharge for non-RBC lien in respect of sale 181;	0.20
Jun-11-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 190;	0.40
Jun-11-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 161(A);	0.50
Jun-11-25	T. Konechny	Attend to drafting Ontario PPSA partial discharge and BC PPSA discharges for non-RBC liens in respect of sale 183;	0.30
Jun-11-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches; further to same;	0.20
Jun-11-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, British Columbia and Alberta PPSA VIN due diligence search	0.30

Date	Name	Description	Hours
		request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	
Jun-11-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN obtaining and reviewing search results;	0.20
Jun-11-25	N. Levine	Call with client and agent's counsel; review outstanding litigation issues; correspondence regarding Ryson;	0.60
Jun-11-25	A. Slota	Receiving and reviewing instructions; attending to PPSA VIN due diligence search request matters (in all Provinces, save for Quebec) in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.90
Jun-11-25	A. Slota	Attending to ongoing Ontario, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Jun-11-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Jun-11-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 2 VINS; conducting searches;	0.20
Jun-11-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN conducting searches;	0.20
Jun-11-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 7 VINS; conducting searches;	0.70
Jun-11-25	A. Slota	Attending to ongoing Ontario, British Columbia and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Jun-11-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 2 VINS; conducting searches;	0.20
Jun-11-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, British Columbia and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Jun-11-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Jun-12-25	E. Curtis	Reviewing active sale notices;	1.20
Jun-12-25	A. Glover	Report to A&M in respect of sales 181 and 183; review draft discharges for sale 181 and instruct clerks to file;	0.80
Jun-12-25	T. Li	Review of lien summaries; correspondence with client and working group regarding file matters;	0.90
Jun-12-25	H. Dylewski	Continue receiving confirmations/verification statements pertaining to Sale 173; providing report of same;	0.40
Jun-12-25	H. Dylewski	Continue receiving confirmations/verification statements	0.30

Date	Name	Description	Hours
Jun-12-25	S. Rothery	pertaining to Sale 176; providing report of same; Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; correspond with client regarding lien discharges;	0.40
Jun-12-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jun-12-25	A. Slota	Attending to ongoing Ontario, British Columbia and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Jun-12-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jun-12-25	A. Slota	Attending to ongoing Ontario, British Columbia and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing balance of all search results;	0.30
Jun-12-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 2 VINS; obtaining and reviewed search results;	0.20
Jun-12-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 2 VINS; obtaining and reviewing search results, further to same;	0.20
Jun-12-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jun-12-25	T. Konechny	Attend to filing British Columbia PPSA discharges for non-RBC liens in respect of sale 180;	0.20
Jun-12-25	A. Slota	Attending to ongoing PPSA VIN due diligence search request matters (in all Provinces, save for Quebec) in respect of 1 VIN; conducting, obtaining and reviewing balance of all search results;	0.90
Jun-12-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 7 VINS; obtaining and reviewing search results;	0.70
Jun-12-25	T. Konechny	Attend to filing Ontario PPSA partial discharge and BC PPSA discharges for non-RBC liens in respect of sale 183;	0.30
Jun-12-25	T. Konechny	Attend to filing Manitoba PPSA partial discharge for non-RBC lien in respect of sale 181;	0.10
Jun-12-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jun-12-25	N. Levine	Confer with Cassels team regarding searches [REDACTED];	0.30
Jun-13-25	K. Seo	Updating sale trackers;	2.30
Jun-13-25	A. Glover	Review correspondence regarding potential sales and	0.50

Date	Name	Description	Hours
		incoming sale notices;	
Jun-13-25	J. Noel	Review PPSA search results regarding lien releases;	0.50
Jun-13-25	T. Li	Attending to lien discharge matters and review of lien summaries;	0.50
Jun-13-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 150; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Jun-13-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 195; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.60
Jun-13-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 134; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.60
Jun-13-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 127; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.40
Jun-13-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 133; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.80
Jun-13-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 152; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.60
Jun-13-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to non-syndicate liens pertaining Sale 139(A);	0.30
Jun-13-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 164; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Jun-13-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	0.30
Jun-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 2 VINS; conducting, obtaining and reviewing initial search results;	0.40
Jun-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Jun-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario	0.20

Date	Name	Description	Hours
		and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	
Jun-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Jun-13-25	A. Slota	Receiving and reviewing instructions; attending to Ministry of Transportation (Ontario) motor vehicle VIN searches in respect of 12 VINS; correspondence and discussions with search agents regarding searches, further to same;	1.50
Jun-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Jun-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches; further to same;	0.20
Jun-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Jun-13-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 134;	0.40
Jun-13-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 127;	0.50
Jun-13-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 152;	0.40
Jun-13-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 164;	0.40
Jun-13-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 133;	0.40
Jun-13-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 150;	0.40
Jun-13-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 195;	0.40
Jun-13-25	S. Kukulowicz	Review of endorsement and order regarding Phoenix transaction and distribution to the Syndicate;	0.20
Jun-13-25	N. Levine	Review wind up analysis; correspondence regarding liens; confer with client;	0.30
Jun-16-25	A. Glover	Review searches in respect of sale 190;	0.30
Jun-16-25	H. Dylewski	Continue receiving confirmations/verification statements pertaining to Sale 127; providing report of same;	0.50
Jun-16-25	A. Slota	Attending to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing balance of all search results;	0.20
Jun-16-25	A. Slota	Attending to ongoing Ministry of Transportation (Ontario)	0.50

Date	Name	Description	Hours
		motor vehicle VIN searches in respect of 12 VINS; obtaining and reviewing search results;	
Jun-16-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of the following: 1XKYD49X5NJ482663; obtaining and reviewing search results, further to same;	0.20
Jun-16-25	A. Slota	Attending to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 2 VINS; obtaining and reviewing balance of all search results, further to same;	0.40
Jun-16-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Jun-16-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of the following: 1XKDP4TX8RR957860; obtaining and reviewing search results, further to same;	0.20
Jun-16-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jun-16-25	A. Slota	Attending to ongoing Ontario, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Jun-16-25	N. Levine	Call to client regarding Ryson; review searches; correspond with Cassels team;	0.20
Jun-17-25	E. Curtis	Reviewing active sale notices and providing discharges to the client;	1.30
Jun-17-25	K. Seo	Updating sale trackers;	3.20
Jun-17-25	A. Glover	Review searches, order draft discharges and correspondence regarding incoming financier's lien in respect of sale 190;	0.80
Jun-17-25	J. Noel	Review PPSA searches and draft PPSA discharges regarding lien releases;	1.80
Jun-17-25	T. Li	Review of lien summaries; correspondence with client and working group regarding file matters;	0.40
Jun-17-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 196; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.50
Jun-17-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 123; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.50
Jun-17-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 184; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.50

Date	Name	Description	Hours
		providing report of same;	
Jun-17-25	M. Clarkson-Maciel	Preparing manager report documentation and related materials; review of the same; considering summary of workstreams;	1.20
Jun-17-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	0.30
Jun-17-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 197; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.50
Jun-17-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 132; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Jun-17-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to non-syndicate liens pertaining Sale 190;	0.20
Jun-17-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 022(G); attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.50
Jun-17-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 123;	0.40
Jun-17-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 022(G);	0.40
Jun-17-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 197;	0.40
Jun-17-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 132;	0.40
Jun-17-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 184;	0.40
Jun-17-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 196;	0.40
Jun-17-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Jun-17-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Jun-17-25	N. Levine	Call with E. Mann regarding status; review correspondence regarding liens;	0.40
Jun-17-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20

Date	Name	Description	Hours
Jun-17-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Jun-17-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Jun-17-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Jun-18-25	E. Curtis	Reviewing active sale notices and draft discharges; providing discharges to the client;	2.20
Jun-18-25	A. Glover	Review and instruct clerks to file discharges for sale 173;	0.30
Jun-18-25	K. Seo	Updating sale trackers;	1.30
Jun-18-25	T. Li	Review of lien summaries; correspondence with client and working group regarding file matters;	0.50
Jun-18-25	J. Noel	Review sale notices;	0.20
Jun-18-25	M. Clarkson-Maciel	Call with A&M regarding Ryson; consideration of issues;	0.60
Jun-18-25	F. Ebadi	Receiving and reviewing instructions; attending to the costs associated with searches and providing summary of same; email correspondence with working group;	0.20
Jun-18-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches and draft lien discharges; Correspond with client regarding lien discharges;	1.70
Jun-18-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to non-syndicate liens pertaining Sale 161(A);	0.30
Jun-18-25	H. Dylewski	Attending to the registration of PPSA financing statements relating to non-syndicate liens pertaining Sale 190; receiving confirmations and verification statements of same; correspondence with working group with respect to same;	0.40
Jun-18-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Jun-18-25	A. Slota	Attending to ongoing Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Jun-18-25	T. Konechny	Attend to drafting British Columbia PPSA discharge in respect of non-RBC lien for sale 173;	0.20
Jun-18-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Jun-18-25	A. Slota	Attending to ongoing Ontario and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20

Date	Name	Description	Hours
Jun-18-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jun-18-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jun-18-25	N. Levine	Call with A&M; call to counsel to other court officers;	0.40
Jun-19-25	E. Curtis	Reviewing active sales;	0.50
Jun-19-25	K. Seo	Updating sale trackers;	3.30
Jun-19-25	A. Glover	Report to A&M on sales 133, 134, 139, 152, 161 and 173;	1.50
Jun-19-25	C. Potter	Matters regarding discharges and related items; correspondence regarding the same;	0.30
Jun-19-25	T. Li	Review of lien summaries; correspondence with client and working group regarding file matters;	0.60
Jun-19-25	H. Dylewski	Attending to the registration of PPSA financing statement relating to non-syndicate liens pertaining Sale 150; receiving confirmation and verification statement of same; correspondence with working group with respect to same;	0.40
Jun-19-25	M. Clarkson-Maciel	Reviewing motion record from applicant regarding upcoming hearing; considering issues specific to manager; considering issues regarding Ryson dealer agreement; collection of factual background for manager's report;	3.20
Jun-19-25	E. Hyderman	Review motion record of the Applicants in connection with June 25, 2025, hearing; correspondence with S. Kukulowicz, N. Levine, and M. Clarkson-Maciel regarding same;	0.40
Jun-19-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	0.30
Jun-19-25	H. Dylewski	Attending to the registration of PPSA financing statements relating to non-syndicate liens pertaining Sale 152; receiving verification statement of same; correspondence with working group with respect to same;	0.20
Jun-19-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 192; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.60
Jun-19-25	H. Dylewski	Attending to the registration of PPSA financing statements relating to non-syndicate liens pertaining Sale 139(A); receiving confirmations and verification statements of same; correspondence with working group with respect to same;	0.70
Jun-19-25	H. Dylewski	Attending to the registration of PPSA financing statements relating to non-syndicate liens pertaining Sale 161(A); receiving confirmations and verification statements of same; correspondence with working group with respect to same;	0.70
Jun-19-25	T. Konechny	Attend to filing Ontario PPSA partial discharge of non-RBC	0.20

Date	Name	Description	Hours
		lien in respect of sale 133;	
Jun-19-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 192;	0.40
Jun-19-25	T. Konechny	Attend to filing British Columbia PPSA discharges for non-RBC liens in respect of sale 134;	0.20
Jun-19-25	T. Konechny	Attend to filing British Columbia and Ontario PPSA discharges for non-RBC liens in respect of sale 173;	0.20
Jun-19-25	N. Levine	Emails regarding hearing; call with other parties; email to client;	0.40
Jun-19-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Jun-19-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 2 VINS; conducting searches;	0.20
Jun-19-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 2 VINS conducting, obtaining and reviewing initial search results;	0.60
Jun-20-25	K. Seo	Updating sale trackers;	0.40
Jun-20-25	E. Curtis	Communicating with client;	0.10
Jun-20-25	H. Dylewski	Providing confirmation and verification statements of PPSA discharge financing statements pertaining to Sale 192 to the client;	0.20
Jun-20-25	S. Kukulowicz	Review of Pride motion record regarding allocation process; review of Monitor's 28th Report;	1.10
Jun-20-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 2 VINS; obtaining and reviewing balance of all search results;	0.60
Jun-20-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 2 VINS; obtaining and reviewing search results;	0.20
Jun-20-25	N. Levine	Confer with client regarding dispute; consider mediation issues; review record;	0.70
Jun-20-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 2 VINS; obtaining and reviewing balance of all search results;	0.20
Jun-23-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 140;	0.50
Jun-23-25	K. Seo	Updating sale trackers;	2.30
Jun-23-25	A. Glover	Review discharges for sale 177 and provide instruction to clerks regarding same; review correspondence regarding potential sales and upcoming sale notices;	1.20

Date	Name	Description	Hours
Jun-23-25	E. Curtis	Providing discharges to client regarding sale 177; reviewing active sale notices and draft discharges;	2.00
Jun-23-25	C. Pendrith	Review counterproposals and consider same; communications concerning counterproposal;	0.30
Jun-23-25	T. Li	Call with N. Levine in respect of lien release protocol; review of lien summaries and correspond with working group regarding same;	0.40
Jun-23-25	M. Clarkson-Maciel	Review correspondence and settlement terms regarding Ryson;	0.30
Jun-23-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 140; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.70
Jun-23-25	H. Dylewski	Attending to the registration of PPSA financing statement relating to non-syndicate liens pertaining Sale 177; receiving confirmation and verification statement of same; correspondence with working group with respect to same;	0.40
Jun-23-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 130(A); attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.50
Jun-23-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	0.40
Jun-23-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 130(A);	0.40
Jun-23-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 156;	0.70
Jun-23-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 198;	0.70
Jun-23-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 2 VINS; conducting, obtaining and reviewing initial search results;	0.30
Jun-23-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Manitoba and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Jun-23-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 4 VINS; conducting, obtaining and reviewing initial search results;	0.80
Jun-23-25	S. Kukulowicz	Review of Pride factum for various relief including allocation mediation; review of other court materials;	0.50
Jun-23-25	N. Levine	Review report; address Ryson issues; review factum; call with receiver; call with client;	1.80

Date	Name	Description	Hours
Jun-24-25	K. Seo	Updating sale trackers;	0.20
Jun-24-25	C. Pendrith	Various emails concerning potential counterproposals;	0.30
Jun-24-25	M. Clarkson-Maciel	Consideration of proposal from Ryson; review of court filing materials related to hearing on June 25;	0.50
Jun-24-25	H. Dylewski	Continue receiving confirmations/verification statements pertaining to Sale 198;	0.50
Jun-24-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review client correspondence regarding lien discharges;	0.10
Jun-24-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 2 VINS; obtaining and reviewing balance of all search results;	0.30
Jun-24-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Jun-24-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Jun-24-25	A. Slota	Attending to ongoing Ontario, Manitoba and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Jun-24-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 4 VINS; obtaining and reviewing balance of all search results;	0.80
Jun-24-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Jun-24-25	S. Kukulowicz	Review of responding motion materials;	0.30
Jun-24-25	N. Levine	Review settlement materials; calls with client; email regarding settlement;	0.40
Jun-25-25	E. Curtis	Reviewing draft discharge;	0.20
Jun-25-25	K. Seo	Updating sale trackers;	0.90
Jun-25-25	J. Trinh	Attending to preparation and registration of PPSA discharges relating to RBC syndicate liens relating to sale 185; receiving and reviewing confirmation/verification statements;	0.80
Jun-25-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 185;	0.20
Jun-25-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 201;	0.20
Jun-25-25	T. Li	Correspondence and review of lien discharge summaries;	0.50
Jun-25-25	A. Glover	Review draft discharge for sale 177; report to A&M on sale 177; review and file correspondence in respect of upcoming sale notices;	0.70
Jun-25-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review client	0.10

Date	Name	Description	Hours
		correspondence regarding lien discharges;	
Jun-25-25	A. Slota	Attending to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Jun-26-25	E. Curtis	Reviewing draft discharge in regards to sale 123;	0.40
Jun-26-25	K. Seo	Updating sale trackers;	0.60
Jun-26-25	A. Glover	Review correspondence from A&M regarding upcoming potential sales and sale notices;	0.10
Jun-26-25	J. Trinh	Receiving PPSA VIN search in respect of Sale 185 and providing report with respect to same;	0.10
Jun-26-25	J. Trinh	Receiving PPSA VIN search in respect of Sale 201 and providing report with respect to same;	0.10
Jun-26-25	J. Noel	Review PPSA searches regarding lien releases;	0.80
Jun-26-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 199; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.70
Jun-26-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review client correspondence regarding lien discharges;	0.20
Jun-26-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 2 VINS conducting searches;	0.40
Jun-26-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Jun-26-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Jun-26-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Jun-26-25	T. Konechny	Attend to drafting BC and Ontario PPSA discharges in respect of non-RBC liens for sale 198;	0.20
Jun-26-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 199;	0.40
Jun-26-25	N. Levine	Call with Ryson counsel; email with client; emails regarding lease buyout; call with client; email with counterparty regarding settlement;	0.70
Jun-26-25	M. Clarkson-Maciel	Consideration of materials provided to service list in relation to manager following hearing;	0.20
Jun-27-25	E. Curtis	Review draft discharge	0.10
Jun-27-25	K. Seo	Updating sale trackers;	0.40
Jun-27-25	J. Trinh	Attending to registration of discharge of non-RBC syndicate lien pertaining to Sale 123; receiving and reviewing	0.10

Date	Name	Description	Hours
		confirmation/verification of same;	
Jun-27-25	C. Potter	Matters regarding PPSA discharges and related matters;	0.20
		correspondence regarding the same;	
Jun-27-25	N. Levine	Call with client; consider notes for letter; review IFT agreement;	0.60
Jun-27-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jun-27-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 2 VINS; obtaining and reviewing search results;	0.20
Jun-27-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jun-27-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jun-28-25	A. Glover	Review searches for sale 192 and report to T. Li regarding same; correspondence with A&M regarding potential incoming financier's lien for sale 192;	0.60
Jun-29-25	J. Noel	Review PPSA searches regarding lien releases;	1.60
Jun-29-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; Instruct clerks to file discharges;	0.50
Jun-29-25	N. Levine	Review variance report and other documents served;	0.10
Jun-30-25	K. Seo	Updating sale trackers;	1.20
Jun-30-25	E. Curtis	Review of active sale notices;	0.60
Jun-30-25	A. Glover	Update internal tracker regarding completion of sale notices;	0.40
Jun-30-25	J. Trinh	Attending to registration of non-RBC syndicate lien discharge pertaining to Sale 132; receiving and reviewing confirmation/verification of same;	0.30
Jun-30-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 022(H);	0.20
Jun-30-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 201;	0.10
Jun-30-25	J. Noel	Review draft PPSA discharges regarding lien releases;	0.40
Jun-30-25	H. Dylewski	Preparing draft ON PPSA financing change statement relating to non-syndicate liens pertaining Sale 196; attending to the registration of PPSA financing statement; receiving confirmation and verification statement of same; correspondence with working group with respect to same;	0.60
Jun-30-25	H. Dylewski	Attending to the registration of PPSA financing statement relating to non-syndicate liens pertaining Sale 022(G); receiving confirmation and verification statement of same; correspondence with working group with respect to same;	0.40
Jun-30-25	S. Rothery	Attend to PPSA matters; update internal status tracking	1.80

Date	Name	Description	Hours
		sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; Instruct clerks to file discharges; correspond with client regarding lien discharges;	
Jun-30-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 201;	0.50
		Attending to the registration of financing statements; Receiving confirmations/verification statements of same;	
Jun-30-25	H. Dylewski	Preparing draft AB PPSA financing change statement relating to non-syndicate liens pertaining Sale 197;	0.40
		attending to the registration of PPSA financing statement; receiving verification statement of same; correspondence with working group with respect to same;	
Jun-30-25	H. Dylewski	Preparing draft ON and MB PPSA financing change statements relating to non-syndicate liens pertaining Sale 184; attending to the registration of financing statements;	0.60
		receiving confirmation and verification statements of same; correspondence with working group with respect to same;	
Jun-30-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 022(H);	0.70
		attending to the registration of financing statements; receiving confirmations/verification statements of same;	
Jun-30-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 201;	0.40
Jun-30-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 022(H);	0.60

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Potter, Carla	Partner	1.10	840.00	924.00
Pendrith, Colin	Partner	2.40	950.00	2,280.00
Levine, Natalie	Partner	12.10	1,025.00	12,402.50
Kukulowicz, Shayne	Partner	3.60	1,650.00	5,940.00
Curtis, Erin	Associate	17.70	500.00	8,850.00
Seo, Kevin	Associate	33.00	500.00	16,500.00
Glover, Anna	Associate	14.00	500.00	7,000.00
Noel, J'Davia	Associate	9.10	525.00	4,777.50
Li, Timon	Associate	10.40	550.00	5,720.00
Clarkson-Maciel, Matteo	Associate	8.40	700.00	5,880.00
Rothery, Shae	Associate	19.50	500.00	9,750.00
Hyderman, Eva	Associate	3.20	500.00	1,600.00
Konechny, Tiffany	Law Clerk / Paralegal	18.20	450.00	8,190.00
Trinh, Julia	Law Clerk / Paralegal	8.80	500.00	4,400.00

Name	Title	Hours	Rate	Amount
Dylewski, Hannah	Law Clerk / Paralegal	28.90	400.00	11,560.00
Ebadi, Fatima	Law Clerk / Paralegal	0.80	425.00	340.00
Im, Anita	Law Clerk / Paralegal	1.80	400.00	720.00
Slota, Alex	Law Clerk / Paralegal	43.60	450.00	19,620.00
TOTAL (CAD)		236.60		126,454.00

Our Fees	126,454.00
Less 10% discount	(12,645.40)
Total Fees	113,808.60
HST @ 13.00%	14,795.12
TOTAL FEES & TAXES (CAD)	128,603.72

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

PPSA - Registration/Applic./Discharges	3,491.75
BC Online - PPSA Search/Registrations	517.50
Electronic Due Diligence	2,717.50
Corporate Filings	552.00
Total Non-Taxable Disbursements	7,278.75

Taxable Disbursements

PPSA - Registration/Applic./Discharges	14,181.70
Electronic Due Diligence	5,581.00
Total Taxable Disbursements	19,762.70
HST @ 13.00%	2,569.15
Total Taxable Disbursements & Taxes	22,331.85

TOTAL DISBURSEMENTS & TAXES (CAD)	29,610.60
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TOTAL FEES	113,808.60
TOTAL DISBURSEMENTS	27,041.45
TOTAL TAXES	17,364.27
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	158,214.32



Attn: Douglas McIntosh
Alvarez & Marsal Canada Inc., in its capacity as
Court-Appointed Manager over certain property of
TPine Leasing Capital Corporation et al.
200 Bay Street, Suite 3501
Royal Bank Plaza, South Tower
Toronto, ON M5J 2J1

Invoice No: 2294362
Date: August 31, 2025
Matter No.: 059366-00005
GST/HST No.: R121379572

Lawyer: Kukulowicz, Shayne
Tel.: (416) 860-6463
E-mail: SKukulowicz@cassels.com

Re: Court-appointment as Manager of certain assets of the Pride Group

Fees for professional services rendered up to and including July 31, 2025

Our Fees	119,849.00
Less Discount	(11,984.90)
Total Fees	107,864.10
Disbursements	17,297.45
Total Fees and Disbursements	125,161.55
HST @ 13.00%	15,744.91
TOTAL DUE (CAD)	140,906.46

We are committed to protecting the environment.

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REMITTANCE ADVICE: Email payment details to payments@cassels.com

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Bank of Nova Scotia
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Toronto, ON, M5H 1H1

Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

Online Bill Payments:

Vendor name is **Cassels Brock Blackwell LLP** and
you are required to enter the first six digits of the
matter #

Invoice No: 2294362
Matter No.: 059366-00005

Amount: **CAD 140,906.46**

e-Transfer Payments: payments@cassels.com

Credit Card Payments: payments.cassels.com

Cassels Brock Blackwell LLP | cassels.com

Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL			
Date	Name	Description	Hours
Jul-02-25	J. Noel	Review PPSA searches and draft registrations regarding lien releases;	0.90
Jul-02-25	K. Seo	Attending to administrative matters; updating sale trackers;	2.50
Jul-02-25	E. Curtis	Reviewing open sale notices; updating internal trackers;	1.00
Jul-02-25	H. Dylewski	Continue receiving confirmations/verification statements relating to RBC syndicate liens pertaining Sale 022(H); Providing report of same;	0.30
Jul-02-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches and draft lien discharges; Instruct clerks to file discharges; Correspond with client regarding lien discharges;	3.80
Jul-02-25	H. Dylewski	Preparing draft MB PPSA financing change statement relating to non-syndicate liens pertaining Sale 184; Attending to the registration of financing statement; Receiving verification statement of same; Correspondence with working group with respect to same;	0.20
Jul-02-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 160; Attending to the registration of financing statements;	0.40
Jul-02-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 167; Attending to the registration of financing statements;	0.40
Jul-02-25	A. Glover	Report to A&M regarding sales 184 and 197;	0.80
Jul-02-25	T. Konechny	Attend to filing Alberta PPSA partial discharge in respect of non-RBC lien for sale 140;	0.20
Jul-02-25	T. Konechny	Attend to drafting Ontario PPSA discharge for non-RBC lien in respect of sale 201;	0.10
Jul-02-25	T. Konechny	Attend to drafting Ontario PPSA discharge for non-RBC lien in respect of sale 199;	0.10
Jul-02-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 167;	0.40
Jul-02-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 160;	0.40
Jul-02-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 2 VINS;	0.40
Jul-02-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 204;	0.70
Jul-02-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 2 VINS;	0.40
Jul-02-25	J. Trinh	Attending to registration of PPSA discharges in respect of Sale 130A; Receiving and reviewing PPSA verification statements;	0.20

Date	Name	Description	Hours
Jul-02-25	J. Trinh	Receiving results of PPSA VIN search in respect of Sale 201 and providing report with respect to same;	0.10
Jul-02-25	J. Trinh	Receiving results of PPSA VIN search in respect of Sale 022H and providing report with respect to same;	0.10
Jul-02-25	N. Levine	Review updates re missing VINs; correspondence regarding lien issues; emails regarding Walmart;	0.30
Jul-03-25	J. Noel	Review draft PPSA discharges regarding lien releases;	0.30
Jul-03-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.40
Jul-03-25	H. Dylewski	Attending to the registration of financing statements relating to non-syndicate liens pertaining Sale 022(H); Receiving confirmations and verification statements of same; Correspondence with working group with respect to same;	0.50
Jul-03-25	H. Dylewski	Receiving verification statements relating to RBC syndicate liens pertaining Sale 204;	0.30
Jul-03-25	H. Dylewski	Attending to the registration of financing statement relating to non-syndicate liens pertaining Sale 160; Receiving confirmation and verification statement of same; Correspondence with working group with respect to same;	0.40
Jul-03-25	E. Curtis	Reviewing open sale notices; reviewing bringdown searches and corresponding with the client;	2.80
Jul-03-25	A. Glover	Update internal tracker in respect of completed sales; Review correspondence from A&M regarding sale notices and potential sales;	0.50
Jul-03-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches and draft lien discharges; Instruct clerks to file discharges; Correspond with client regarding lien discharges;	2.30
Jul-03-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing initial search results;	0.20
Jul-03-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 2 VINS; obtaining and reviewing search results;	0.40
Jul-03-25	T. Konechny	Attend to filing Ontario PPSA discharge for non-RBC lien in respect of sale 199;	0.10
Jul-03-25	T. Konechny	Attend to filing Ontario PPSA discharge for non-RBC lien in respect of sale 201;	0.10
Jul-03-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jul-03-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20

Date	Name	Description	Hours
Jul-03-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jul-03-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Jul-03-25	T. Konechny	Attend to filing Ontario and British Columbia PPSA discharges for non-RBC lien in respect of sale 198;	0.20
Jul-03-25	J. Trinh	Attending to registration of non-RBC syndicate lien PPSA discharge in respect of Sale 156; Receiving and reviewing PPSA verification statement;	0.20
Jul-03-25	J. Trinh	Attending to registration of non-RBC syndicate lien PPSA discharges in respect of Sale 136; Receiving and reviewing PPSA verification statements;	0.30
Jul-03-25	N. Levine	Correspond with settlement party; review emails regarding missing assets; consider lien issues;	0.40
Jul-04-25	E. Curtis	Corresponding with client;	0.10
Jul-04-25	T. Li	Call with J. Trinh in respect of certain PPSA discharges and correspondence with working group regarding same;	0.20
Jul-04-25	H. Dylewski	Receiving confirmations/verification statements relating to RBC syndicate liens pertaining Sale 167; Providing report of same;	0.50
Jul-04-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches and draft lien discharges; Instruct clerks to file discharges; Correspond with client regarding lien discharges;	0.20
Jul-04-25	A. Slota	Attending to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Jul-04-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Jul-04-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN;	0.20
Jul-04-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Jul-04-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN;	0.20
Jul-07-25	T. Konechny	Attend to filing PPSA partial discharges in respect of sale 202;	0.50
Jul-07-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.70
Jul-07-25	M. Clarkson-Maciel	Review and markup of settlement agreement regarding	0.30

Date	Name	Description	Hours
Jul-07-25	S. Rothery	Ryson trucks, consideration of issues to manager; Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches and draft lien discharges; Correspond with client regarding lien discharges;	0.50
Jul-07-25	E. Curtis	Reporting to A&M;	0.10
Jul-07-25	A. Glover	Review initial searches for sale 191; Review draft discharges for sale 124;	0.60
Jul-07-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Jul-07-25	T. Konechny	Attend to filing PPSA partial discharges in respect of sale 124;	0.50
Jul-07-25	J. Trinh	Attending to preparation and registration of RBC syndicate lien discharges in respect of sale 191; Receiving and reviewing PPSA confirmations/verifications; Providing report with respect to same;	0.80
Jul-07-25	J. Trinh	Attending to registration of non-RBC syndicate lien discharge in respect of Sale 170; Receiving and reviewing confirmation/verification of same;	0.20
Jul-07-25	J. Trinh	Attending to preparation and registration of RBC syndicate lien discharges in respect of sale 110A; Receiving and reviewing PPSA confirmations/verifications; Providing report with respect to same;	0.80
Jul-07-25	C. Potter	Matters regarding PPSA discharges and review correspondence regarding the same;	0.30
Jul-07-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 6 VINS;	0.90
Jul-07-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Jul-07-25	N. Levine	Confer with counterparty; correspond with client; address lease issues	0.30
Jul-08-25	J. Noel	Review sale notices and potential sale notices;	0.10
Jul-08-25	K. Seo	Attending to administrative matters; updating sale trackers;	2.20
Jul-08-25	E. Curtis	Reviewing bringdown searches and active sale notices;	0.80
Jul-08-25	A. Glover	Report to A&M on sale 191; Review correspondence regarding sale 079;	0.60
Jul-08-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches and draft lien discharges;	1.90
Jul-08-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20

Date	Name	Description	Hours
Jul-08-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 3 VINS; obtaining and reviewing search results;	0.30
Jul-08-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of 4 VINS; conducting, obtaining and reviewing initial search results;	0.80
Jul-08-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN;	0.20
Jul-08-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Jul-08-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jul-08-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Jul-08-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Jul-08-25	A. Slota	Attending to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Jul-08-25	T. Konechny	Attend to filing PPSA partial discharges in respect of sale 16(C);	0.50
Jul-08-25	T. Konechny	Attend to filing PPSA partial discharges in respect of sale 194;	0.50
Jul-08-25	T. Konechny	Attend to filing PPSA partial discharges in respect of sale 79(A);	1.00
Jul-08-25	J. Trinh	Attending to registration of non-RBC syndicate lien PPSA discharge relating to Sale 124; Receiving and reviewing verification of same;	0.20
Jul-08-25	J. Trinh	Attending to preparation and registration of RBC syndicate lien discharges in respect of sale 205; Receiving and reviewing PPSA confirmations/verifications; Providing report with respect to same;	0.80
Jul-08-25	J. Trinh	Attending to preparation and registration of RBC syndicate lien discharges in respect of sale 206; Receiving and reviewing PPSA confirmations/verifications; Attending to AB PPSA search and reviewing results of same relating to VIN already discharged; Providing report with respect to same;	1.00
Jul-08-25	C. Pendrith	Discussion with N. Levine; consider ways to amplify settlement pressure;	0.30

Date	Name	Description	Hours
Jul-08-25	N. Levine	Correspondence regarding lease buyouts and discharges;	0.20
Jul-09-25	J. Noel	Review PPSA searches and draft PPSA discharges regarding lien releases;	1.00
Jul-09-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.10
Jul-09-25	T. Li	Review of lien summaries and attending to discharge related matters;	1.00
Jul-09-25	J. Trinh	Attending to preparation and registration of RBC syndicate lien discharges in respect of sale 208; Receiving and reviewing PPSA confirmations/verifications; Providing report with respect to same;	0.80
Jul-09-25	J. Trinh	Attending to preparation and registration of RBC syndicate lien discharges in respect of sale 104; Receiving and reviewing PPSA confirmations/verifications; Providing report with respect to same;	0.80
Jul-09-25	J. Trinh	Attending to registration of non-RBC syndicate lien discharge in respect of Sale 79A; Attending to MB PPSA searches in respect of 2 VINS; Preparing complete MB PPSA discharges in respect of such VINS; Attending to registration of same; Receiving and reviewing confirmation/verification of same;	1.10
Jul-09-25	J. Trinh	Attending to preparation and registration of RBC syndicate lien discharges in respect of sale 203; Receiving and reviewing PPSA confirmations/verifications; Providing report with respect to same;	0.80
Jul-09-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches and draft lien discharges; Correspond with client regarding lien discharges; Correspond with Quebec counsel regarding lien discharges;	1.80
Jul-09-25	A. Glover	Review draft discharges in respect of sale 079A; Review correspondence regarding upcoming sale notices;	0.60
Jul-09-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Jul-09-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 6 VINS;	0.60
Jul-09-25	A. Slota	Attending to ongoing Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of 4 VINS; obtaining and reviewing balance of all search results;	0.80
Jul-09-25	A. Slota	Receiving and reviewing instructions; attending to Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing search results;	0.20
Jul-09-25	A. Slota	Attending to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Jul-09-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of	0.20

Date	Name	Description	Hours
		1 VIN;	
Jul-09-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Jul-09-25	N. Levine	Work on lease assignment issues; respond to client inquiries; address lien issues	1.00
Jul-10-25	J. Noel	Review PPSA search results and draft PPSA discharges regarding lien releases;	1.90
Jul-10-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.50
Jul-10-25	T. Li	Correspondence and call with client in respect of RSLA liens and discussion with working group regarding same; review of lien summaries and attending to other discharge-related matters;	2.50
Jul-10-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches and draft lien discharges;	0.60
Jul-10-25	A. Glover	Review searches in respect of sale 194 and report on same; Order draft discharges in respect of sale 194; Review discharges for sale 016(B) and instruct clerks to file; Correspondence with A&M regarding liens from potential incoming financiers; Review internal tracker of completed sales and update same;	1.50
Jul-10-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 7 VINS;	0.30
Jul-10-25	T. Konechny	Attend to drafting Ontario PPSA discharge in respect of non-RBC lien for sale 206;	0.20
Jul-10-25	T. Konechny	Attend to drafting British Columbia PPSA discharge in respect of non-RBC lien for sale 205;	0.20
Jul-10-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 3 VINS; obtaining and reviewing search results;	0.20
Jul-10-25	C. Potter	Matters regarding RSLA liens and related matters; correspondence regarding the same; matters relating to discharges and related items;	0.40
Jul-10-25	J. Trinh	Attending to preparation and registration of RBC syndicate lien discharges in respect of sale 178A; Receiving and reviewing PPSA confirmations/verifications; Providing report with respect to same;	0.80
Jul-10-25	J. Trinh	Attending to preparation and registration of RBC syndicate lien discharges in respect of sale 022(I); Receiving and reviewing PPSA confirmations/verifications; Providing report with respect to same;	1.50
Jul-10-25	N. Levine	Confer with client regarding settlement; correspondence with counter party regarding same; consider strategy issues; discuss lien claim issues with Cassels team; confer with purchaser counsel	1.10

Date	Name	Description	Hours
Jul-11-25	J. Noel	Review draft PPSA discharges and PPSA searches regarding lien releases;	0.90
Jul-11-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.90
Jul-11-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 210;	0.20
Jul-11-25	A. Glover	Review correspondence regarding upcoming sale notices and potential sales;	0.20
Jul-11-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches and draft lien discharges;	0.30
Jul-11-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 7 VINS; obtaining and reviewing search results;	0.70
Jul-11-25	T. Konechny	Attend to filing Ontario partial PPSA discharges for non-RBC liens in respect of sale 16(C);	0.20
Jul-11-25	J. Trinh	Attending to registration of PPSA discharge financing statement in respect of non-RBC syndicate liens pertaining to Sale 206; Receiving and reviewing confirmation/verification of same;	0.30
Jul-11-25	J. Trinh	Preparing draft PPSA discharge financing statement in respect of non-RBC syndicate liens pertaining to Sale 178(A);	0.20
Jul-11-25	J. Trinh	Preparing draft PPSA discharge financing statement in respect of non-RBC syndicate liens pertaining to Sale 208;	0.20
Jul-11-25	N. Levine	Confer with client regarding settlement, confer with lease buyout party, review motion materials	0.70
Jul-12-25	S. Kukulowicz	Review of the Monitor's First Supplement to its 26th Report;	0.30
Jul-13-25	N. Levine	Review materials; consider RSLA materials;	0.20
Jul-14-25	T. Li	Review of lien summaries and attending to discharge related matters; review B.C. and Alberta RSLA-equivalent legislation and finalize and circulate guidance to client in respect of screening of RSLA liens;	2.40
Jul-14-25	E. Curtis	Reviewing active sale notices and updating internal trackers;	1.40
Jul-14-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.40
Jul-14-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 207;	0.20
Jul-14-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 062A; Receiving and providing report with respect to same;	0.20
Jul-14-25	J. Trinh	Receiving results of PPSA VIN search in respect of Sale 210 and providing report with respect to same;	0.20
Jul-14-25	J. Trinh	Preparing draft PPSA discharge financing statement in respect of non-RBC syndicate liens pertaining to Sale 203);	0.20
Jul-14-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches and draft lien discharges; Correspond with client regarding lien discharges; Correspond with Quebec counsel regarding lien discharges; Instruct clerks to order PPSA searches in respect of vehicles sold by Pride dealers;	2.60

Date	Name	Description	Hours
Jul-14-25	M. Clarkson-Maciel	Markup and drafting of settlement and release agreement regarding Ryson agreement; consideration of issues regarding the same;	6.20
Jul-14-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 207; Attending to the registration of financing statements; Receiving confirmations/verification statements of same; Providing report of same;	0.70
Jul-14-25	A. Glover	Review discharges in respect of sales 203 and 208; Report to A&M regarding sale 206;	0.70
Jul-14-25	E. Hyderman	Review and comment on draft release agreement; correspondence with M. Clarkson-Maciel regarding same;	0.40
Jul-14-25	J. Fleisher	Matters regarding the RSLA;	0.50
Jul-14-25	T. Konechny	Attend to drafting Alberta PPSA discharge for non-RBC lien in respect of sale 207;	0.20
Jul-14-25	T. Konechny	Attend to filing British Columbia PPSA discharge in respect of non-RBC lien for sale 205;	0.10
Jul-14-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 207;	0.40
Jul-14-25	C. Potter	Matters regarding repair and storage lien and related matters; correspondence regarding the same;	0.60
Jul-14-25	N. Levine	Mark up settlement; discuss same with client; discuss RSLA lien issues with Cassels team	1.20
Jul-15-25	T. Li	Review of lien summaries and attending to discharge-related matters;	0.80
Jul-15-25	K. Seo	Attending to administrative matters; updating sale trackers;	2.40
Jul-15-25	J. Trinh	Attending to registration of PPSA discharge financing statement in respect of non-RBC syndicate liens pertaining to Sale 203; Receiving and reviewing confirmation/verification of same;	0.20
Jul-15-25	E. Curtis	Reviewing drafting financing statements; reviewing bringdowns for active sale notices;	1.50
Jul-15-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches and draft lien discharges; Correspond with client regarding lien discharges;	1.00
Jul-15-25	M. Clarkson-Maciel	Drafting settlement agreement; correspondence regarding the same;	0.50
Jul-15-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to non-syndicate liens pertaining Sale 149(A); Attending to the registration of financing statements; Receiving confirmations/verification statements of same; Providing report of same;	0.50
Jul-15-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 149(A); Attending to the registration of financing statements; Receiving confirmations/verification statements of same;	0.70

Date	Name	Description	Hours
		Providing report of same;	
Jul-15-25	A. Glover	Review correspondence regarding potential sales and upcoming sale notices;	0.10
Jul-15-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 149(A);	0.40
Jul-15-25	T. Konechny	Attend to filing Alberta PPSA discharge for non-RBC lien in respect of sale 207;	0.10
Jul-15-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 211;	0.20
Jul-15-25	J. Trinh	Attending to registration of PPSA discharge financing statement in respect of non-RBC syndicate liens pertaining to Sale 178(A); Receiving and reviewing confirmation/verification of same;	0.30
Jul-15-25	J. Trinh	Attending to PPSA VIN search in respect of sale 149A;	0.20
Jul-15-25	J. Trinh	Receiving results of PPSA VIN search in respect of sale 207 and providing report with respect to same;	0.20
Jul-15-25	J. Trinh	Attending to registration of PPSA discharge financing statement in respect of non-RBC syndicate liens pertaining to Sale 208; Receiving and reviewing confirmation/verification of same;	0.20
Jul-15-25	C. Pendrith	Review release and consider issues; call with N. Levine;	0.50
Jul-15-25	N. Levine	Revise agreement; work on additional lien issues; confer with client;	0.80
Jul-16-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.40
Jul-16-25	T. Li	Review of lien summaries and attending to discharge related matters;	0.90
Jul-16-25	J. Trinh	Receiving results of PPSA VIN search in respect of sale 149A and providing report with respect to same;	0.20
Jul-16-25	J. Trinh	Attending to bankruptcy and insolvency searches in respect of Jasvir Singh Johal and Sulakhan Singh Johal;	0.20
Jul-16-25	H. Dylewski	Receiving BIA search results; Correspondence with working group with respect to same;	0.20
Jul-16-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches and draft lien discharges; Correspond with client regarding lien discharges; Instruct clerks to order bankruptcy searches against Sulakhan Singh Johal and Jasvir Johal; Review results of same;	1.20
Jul-16-25	A. Glover	Review correspondence regarding upcoming sale notices from A&M;	0.20
Jul-16-25	E. Curtis	Reviewing bringdown searches; corresponding with client;	0.20
Jul-16-25	J. Trinh	Receiving results of PPSA VIN search in respect of Sale 211 and providing report with respect to same;	0.20
Jul-16-25	N. Levine	Address potential litigation issues; review agreement; confer with client regarding status; consider searches and lien issues;	1.30

Date	Name	Description	Hours
Jul-17-25	J. Noel	Review sale notices;	0.20
Jul-17-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.30
Jul-17-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 187;	0.10
Jul-17-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 124; Receiving and providing report with respect to results of same;	0.20
Jul-17-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 211;	0.10
Jul-17-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 212;	0.20
Jul-17-25	T. Li	Review of lien summaries and attending to discharge related matters;	0.60
Jul-17-25	E. Curtis	Corresponding with client;	0.20
Jul-17-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches and draft lien discharges;	0.20
Jul-17-25	C. Pendrith	Various emails concerning settlement documents; discussion with N. Levine concerning scope of release;	0.30
Jul-17-25	S. Kukulowicz	Telephone attendance with N. Levine and review of Ryson settlement agreement; conference call with A&M regarding Ryson settlement;	0.90
Jul-17-25	N. Levine	Work on settlement issues; calls with client regarding same; correspondence regarding lien issues;	1.80
Jul-18-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.20
Jul-18-25	E. Curtis	Updating internal trackers;	0.20
Jul-18-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Correspond with client regarding lien discharges;	0.10
Jul-18-25	J. Trinh	Receiving results of PPSA VIN search in respect of Sale 212 and providing report with respect to same;	0.20
Jul-18-25	J. Trinh	Receiving results of PPSA VIN search in respect of Sale 187 and providing report with respect to same;	0.20
Jul-18-25	J. Trinh	Receiving results of PPSA VIN search in respect of Sale 211 and providing report with respect to same;	0.20
Jul-18-25	N. Levine	Confer with team regarding settlement and lien issues;	0.30
Jul-21-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.10
Jul-21-25	T. Li	Review of lien summaries and attending to discharge related matters;	0.60
Jul-21-25	E. Curtis	Reviewing open sale notices; internal correspondence;	0.30
Jul-21-25	A. Glover	Review correspondence regarding upcoming sale notices;	0.10
Jul-21-25	S. Kukulowicz	Review of proposed revisions to Schedule D of Collateral Management Order and related emails;	0.20
Jul-21-25	N. Levine	Correspondence regarding revised schedules; confer with client regarding settlement;	0.60
Jul-21-25	M. Clarkson-Maciel	Review and analysis of amendments to schedule to Amended Syndicate Collateral Management Order regarding expansion of Manager's assets;	0.30

Date	Name	Description	Hours
Jul-22-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.90
Jul-22-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 182(A); Attending to the registration of financing statements; Receiving confirmations/verification statements of same;	0.70
Jul-22-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 135; Attending to the registration of financing statements; Receiving confirmations/verification statements of same;	0.50
Jul-22-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches and draft lien discharges; Correspond with client regarding lien discharges;	0.20
Jul-22-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 210; Attending to the registration of financing statements; Receiving confirmations/verification statements of same; Providing report of same;	0.50
Jul-22-25	A. Glover	Review correspondence regarding upcoming sale notices and potential sales;	0.10
Jul-22-25	E. Curtis	Reviewing open sale notices and corresponding internally;	0.20
Jul-22-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 135;	0.40
Jul-22-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 182(A);	0.40
Jul-22-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 210;	0.40
Jul-22-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 210;	0.20
Jul-22-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 135;	0.20
Jul-22-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 182A;	0.20
Jul-22-25	N. Levine	Address settlement issues; confer with client regarding same;	0.30
Jul-23-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.50
Jul-23-25	J. Trinh	Receiving results of PPSA VIN search in respect of Sale 182A and providing report with respect to same;	0.20
Jul-23-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 211;	0.20
Jul-23-25	J. Trinh	Preparing draft PPSA discharge financing statements pertaining to non-RBC syndicate liens in respect of Sale 182(A)	0.20
Jul-23-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 110B;	0.20
Jul-23-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 187;	0.20
Jul-23-25	J. Trinh	Receiving results of PPSA VIN search in respect of Sale 210 and providing report with respect to same;	0.20
Jul-23-25	J. Trinh	Attending to PPSA VIN search in respect of Sale 113;	0.20
Jul-23-25	J. Trinh	Receiving results of PPSA VIN search in respect of Sale 135	0.20

Date	Name	Description	Hours
Jul-23-25	J. Trinh	and providing report with respect to same; Attending to additional PPSA VIN search in respect of Sale 137;	0.20
Jul-23-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 113; Attending to the registration of financing statements; Receiving confirmations/verification statements of same; Providing report of same;	0.60
Jul-23-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 211; Attending to the registration of financing statements; Receiving confirmations/verification statements of same;	0.50
Jul-23-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 187; Attending to the registration of financing statements; Receiving confirmations/verification statements of same; Providing report of same;	0.60
Jul-23-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 110(B); Attending to the registration of financing statements; Receiving confirmations/verification statements of same;	0.50
Jul-23-25	E. Curtis	Reviewing active sale notices;	1.70
Jul-23-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches and draft lien discharges;	0.80
Jul-23-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 113;	0.40
Jul-23-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 187;	0.40
Jul-23-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 110(B);	0.40
Jul-23-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba and Saskatchewan PPSA partial discharges in respect of sale 211;	0.40
Jul-23-25	S. Kukulowicz	Review of emails regarding additional VINs for Schedule D;	0.20
Jul-23-25	N. Levine	Email with purchaser; confer with client regarding sale issues; correspondence regarding liens;	0.50
Jul-24-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.30
Jul-24-25	E. Curtis	Updating internal trackers for active sale notices;	0.50
Jul-24-25	J. Trinh	Receiving results of PPSA VIN search in respect of Sale 110B and providing report with respect to same;	0.20
Jul-24-25	T. Li	Review of lien summaries and attending to discharge related matters;	0.60
Jul-24-25	J. Trinh	Receiving results of PPSA VIN search in respect of Sale 211 and providing report with respect to same;	0.20
Jul-24-25	S. Rothery	Attend to PPSA matters; update internal status tracking	0.60

Date	Name	Description	Hours
		sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to prepare draft discharges; correspond with client regarding lien discharges;	
Jul-24-25	M. Clarkson-Maciel	Redacting documentation prepared by Manager regarding transition of leases;	0.20
Jul-24-25	J. Trinh	Receiving results of PPSA VIN searches in respect of Sale 137 and providing report with respect to same;	0.20
Jul-24-25	J. Trinh	Receiving results of PPSA VIN search in respect of Sale 187 and providing report with respect to same;	0.20
Jul-24-25	J. Trinh	Preparing draft PPSA discharge financing statement in respect of non-RBC syndicate lien pertaining to Sale 016(C);	0.10
Jul-24-25	J. Trinh	Preparing draft PPSA discharge financing statement in respect of non-RBC syndicate lien pertaining to Sale 203;	0.10
Jul-24-25	J. Trinh	Receiving results of PPSA VIN searches in respect of Sale 113 and providing report with respect to same;	0.20
Jul-24-25	N. Levine	Correspond with leasee; confer with client	0.40
Jul-25-25	J. Noel	Review PPSA search results and draft discharges regarding lien releases;	1.30
Jul-25-25	E. Curtis	Internal correspondence;	0.20
Jul-25-25	T. Li	Review of lien summaries and attending to discharge related matters;	0.60
Jul-25-25	M. Clarkson-Maciel	Call with VK law regarding letters to Manager on Tpine leases; review of documentation in preparation for the call;	0.50
Jul-25-25	E. Hyderman	Review and briefly summarize the relief being sought in the motion record served in connection with the August 1, 2025, hearing; correspondence with Cassels team regarding same;	0.30
Jul-25-25	N. Levine	Work on settlement matters; address lien issues; address lease matters; confer with client; review record;	1.20
Jul-25-25	S. Kukulowicz	Review of motion materials regarding sale of various real estate and proposed distributions; review of the Monitor's 29th Report;	0.80
Jul-28-25	E. Curtis	Internal correspondence;	0.20
Jul-28-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; correspond with client regarding lien discharges;	0.20
Jul-28-25	M. Clarkson-Maciel	Review of Tpine leases in preparation for call with counsel for Wings Freightways, 2834021 Ontario, and I-Way Transport; considering issues;	1.00
Jul-28-25	E. Hyderman	Review motion record to verify that the distribution of the factoring proceeds is not part of the relief being sought at the August 1, 2025, hearing; correspondence with N. Levine regarding same;	0.70
Jul-28-25	N. Levine	Correspondence regarding hearing; confer with client regarding order and POA issues; review motion materials;	1.00

Date	Name	Description	Hours
		consider next steps; emails regarding liens;	
Jul-28-25	S. Kukulowicz	Review of emails regarding court materials;	0.20
Jul-29-25	J. Noel	Discussions with Cassels team regarding Manitoba PPSA registration;	0.50
Jul-29-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.60
Jul-29-25	T. Li	Correspondence with client in respect of RSLA liens and consider draft e-mail to monitor; review of orders in respect of discretion to make certain determinations relating to validity of RSLA liens; correspondence with working group regarding same; correspondence with clerks in respect of certain discharged PPSA registration; coordinate working group response to same;	4.20
Jul-29-25	E. Curtis	Reviewing sale accidentally discharges in the VIN reconciliation project; Internal correspondence;	0.30
Jul-29-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 186; Attending to the registration of financing statements; Receiving confirmations/verification statements of same;	1.50
Jul-29-25	M. Clarkson-Maciel	Call with VK law regarding TPine leased vehicles to Wings Freightway Inc, 2834021 Ontario Inc, and I-Way Transport Inc.; reviewing court orders and lease agreements regarding the same; considering issues;	5.50
Jul-29-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to prepare draft discharges; correspond with client regarding lien discharges;	1.30
Jul-29-25	E. Hyderman	Begin to review court materials on the Monitor's website and summarize same regarding the servicer dispute; discussions with M. Clarkson-Maciel regarding same;	2.90
Jul-29-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 5 VINS; conducting searches;	0.60
Jul-29-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Jul-29-25	J. Trinh	Attending to registration of PPSA discharge financing statement in respect of RBC syndicate liens pertaining to Sale 209; receiving and reviewing confirmation/verification of same; investigating with respect to discharge of MB PPSA Reg. No. 202400285804;	0.70
Jul-29-25	J. Trinh	Attending to registration of PPSA discharge financing statement in respect of RBC syndicate liens pertaining to Sale 212; Receiving and reviewing confirmation/verification of same;	0.70
Jul-29-25	J. Trinh	Investigating with respect to discharge of MB PPSA Reg. No. 202400285804; attending to various MB PPSA searches;	1.50

Date	Name	Description	Hours
		receiving and reviewing results of same; call with MB PPR with respect to reinstatement of discharged PPSA registration; correspondence and discussions with working group with respect to MB PPSA matters;	
Jul-29-25	N. Levine	Calls regarding lease issues; call with client regarding POA; address lien discharge issues; calls with client regarding lien matters; calls with Fasken regarding same;	2.30
Jul-30-25	K. Seo	Attending to administrative matters; updating sale trackers;	3.30
Jul-30-25	T. Li	Extensive calls and correspondence with working group, counsel to Monitor and counsel to Royal Bank of Canada in respect of discharged Manitoba PPSA registration and proposed rectification of same; review of Manitoba PPSA regarding provisions in respect of inadvertently-discharged lien registrations; prepare internal memorandum in respect of same for further consideration; review of bring-down due diligence searches in Manitoba regarding related registrations and motor vehicle collateral; review of lien discharge summaries and attending to related matters;	4.40
Jul-30-25	M. Clarkson-Maciel	Call with N. Levine regarding analysis on TPine lease securitisation program; consideration of analysis prepared by E. Hyderman; drafting correspondence to client regarding next steps; considering issues;	1.30
Jul-30-25	S. Rothery	Attend to PPSA matters; Update internal status tracking sheet of Pride vehicle sales and discharges; Review PPSA searches and draft lien discharges;	0.20
Jul-30-25	E. Hyderman	Continue to review court materials on the Monitor's website and summarize same regarding the servicer dispute; correspondence with M. Clarkson-Maciel regarding same;	1.90
Jul-30-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 5 VINS; obtaining and reviewing balance of all search results;	0.60
Jul-30-25	A. Slota	Attending to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Jul-30-25	N. Levine	Work on POA issues; call with Fasken regarding same; address lien issues and calls with Fasken and Cassels team members regarding same; address settlement issues;	1.30
Jul-31-25	K. Seo	Attending to administrative matters; updating sale trackers;	4.50
Jul-31-25	J. Noel	Discussions with Cassels team regarding Manitoba PPSA registration; review VINS discharged per A&M Sale Notices;	1.00
Jul-31-25	J. Trinh	Providing list of discharged VINS relating to Pride Truck Rental Inc. to working group;	0.30
Jul-31-25	J. Trinh	Call with A. Park of Ecore with respect to MB discharge matter;	0.20
Jul-31-25	T. Li	Extensive calls and correspondence with working group, counsel to Monitor and counsel to Royal Bank of Canada in respect of discharged Manitoba PPSA registration and	4.50

Date	Name	Description	Hours
		proposed rectification of same; review of Manitoba PPSA results and correspond with counsel to RBC in respect of certain discharges; finalize internal memorandum in respect of same; review of bring-down due diligence searches in Manitoba regarding related registrations and motor vehicle collateral; review of lien discharge summaries and attending to related due diligence matters;	
Jul-31-25	E. Curtis	Reviewing VIN accidentally discharged by Osler to confirm properly discharges and do not need to be reconciled;	1.10
Jul-31-25	M. Clarkson-Maciel	Follow up correspondence regarding leases;	0.20
Jul-31-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 200; Attending to the registration of financing statements; Receiving confirmations/verification statements of same;	0.70
Jul-31-25	A. Glover	Internal working group call regarding reconstruction of discharged Manitoba registration;	0.30
Jul-31-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; prepare list of Pride Truck Sales Ltd. vehicles discharged by Cassels; discussion with T. Li regarding same;	1.70
Jul-31-25	A. Slota	Receiving and reviewing instructions; attending to BC PPSA due diligence request matters in respect of Pride Truck Sales Ltd.; obtaining copies of corporate documents; reviewing search results and preparing report with respect to same;	0.30
Jul-31-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 2 VINS; conducting, obtaining and reviewing initial search results;	0.60
Jul-31-25	T. Konechny	Attend to drafting and filing BC, Alberta, and Saskatchewan PPSA partial discharges in respect of sale 200;	0.40
Jul-31-25	C. Potter	Matters regarding PPSA discharge matters and correspondence regarding the same;	0.30
Jul-31-25	S. Kukulowicz	Telephone attendance with N. Levine regarding registration discharge issue and related emails; update on Ryson settlement;	0.30
Jul-31-25	C. Pendrith	Attend call with N. Levine and A&M;	0.20
Jul-31-25	N. Levine	Address discharge issues; calls with Fasken and A&M; call with Linklaters regarding POA; work on settlement issues; discussions regarding same; call with Osler;	2.10

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Fleisher, Jonathan	Partner	0.50	1,190.00	595.00
Potter, Carla	Partner	1.60	840.00	1,344.00

Name	Title	Hours	Rate	Amount
Pendrith, Colin	Partner	1.30	950.00	1,235.00
Levine, Natalie	Partner	19.30	1,025.00	19,782.50
Kukulowicz, Shayne	Partner	2.90	1,650.00	4,785.00
Seo, Kevin	Associate	28.20	500.00	14,100.00
Noel, J'Davia	Associate	8.10	525.00	4,252.50
Li, Timon	Associate	23.30	550.00	12,815.00
Curtis, Erin	Associate	12.80	500.00	6,400.00
Rothery, Shae	Associate	21.50	500.00	10,750.00
Clarkson-Maciel, Matteo	Associate	16.00	700.00	11,200.00
Glover, Anna	Associate	6.30	500.00	3,150.00
Hyderman, Eva	Associate	6.20	500.00	3,100.00
Konechny, Tiffany	Law Clerk / Paralegal	10.30	450.00	4,635.00
Trinh, Julia	Law Clerk / Paralegal	22.30	500.00	11,150.00
Dylewski, Hannah	Law Clerk / Paralegal	11.20	400.00	4,480.00
Slota, Alex	Law Clerk / Paralegal	13.50	450.00	6,075.00
TOTAL (CAD)		205.30		119,849.00

Our Fees	119,849.00	
Less Discount	(11,984.90)	
Total Fees	107,864.10	
HST @ 13.00%	14,022.33	
TOTAL FEES & TAXES (CAD)		121,886.43

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

BC Online - PPSA Search/Registrations	356.50
PPSA - Registration/Applic./Discharges	2,528.35
Electronic Due Diligence	766.00
Corporate Filings	396.00
Total Non-Taxable Disbursements	4,046.85

Taxable Disbursements

PPSA - Registration/Applic./Discharges	10,878.60
Electronic Due Diligence	1,486.50
Agency Fees and Disbursements	885.50
Total Taxable Disbursements	13,250.60
HST @ 13.00%	1,722.58
Total Taxable Disbursements & Taxes	14,973.18

Cassels Brock & Blackwell LLP
Alvarez
Re: Court-appointment as Manager of certain assets of the Pride
Group

Page 20 of 20
Invoice No: 2294362
Matter No. 059366-00005

TOTAL DISBURSEMENTS & TAXES (CAD)	19,020.03
TOTAL FEES	107,864.10
TOTAL DISBURSEMENTS	17,297.45
TOTAL TAXES	15,744.91
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	140,906.46



Attn: Douglas McIntosh
Alvarez & Marsal Canada Inc., in its capacity as
Court-Appointed Manager over certain property of
TPine Leasing Capital Corporation et al.
200 Bay Street, Suite 3501
Royal Bank Plaza, South Tower
Toronto, ON M5J 2J1

Invoice No: 2297659
Date: September 30, 2025
Matter No.: 059366-00005
GST/HST No.: R121379572

Lawyer: Kukulowicz, Shayne
Tel.: (416) 860-6463
E-mail: SKukulowicz@cassels.com

Re: Court-appointment as Manager of certain assets of the Pride Group

Fees for professional services rendered up to and including August 31, 2025

Our Fees	107,497.00
Less Discount	(10,749.70)
Total Fees	96,747.30
Disbursements	14,191.10
Total Fees and Disbursements	110,938.40
HST @ 13.00%	13,982.80
TOTAL DUE (CAD)	124,921.20

We are committed to protecting the environment.

Please provide your email address to payments@cassels.com to receive invoice and reminder statements electronically.

Payment due upon receipt. Please return remittance advice(s) with cheque.

REMITTANCE ADVICE: Email payment details to payments@cassels.com

Canadian Dollar EFT and Wire

Payments:

Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1

Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

Online Bill Payments:

Vendor name is **Cassels Brock Blackwell LLP** and
you are required to enter the first six digits of the
matter #

Invoice No: 2297659
Matter No.: 059366-00005

Amount: **CAD 124,921.20**

e-Transfer Payments: payments@cassels.com

Credit Card Payments: payments.cassels.com

Cassels Brock Blackwell LLP | cassels.com

Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL			
Date	Name	Description	Hours
Aug-01-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.20
Aug-01-25	M. Clarkson-Maciel	Reviewing and providing advice on correspondence to Manager regarding lease between Tpine leasing and allegations made by counsel to 2834021 Ontario Inc.;	0.40
Aug-01-25	M. Clarkson-Maciel	Correspondence with VK law regarding claims under Tpine lease agreements; correspondence with A&M regarding the same;	0.80
Aug-01-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges;	0.10
Aug-01-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 2 VINS; obtaining and reviewing balance of all search results, further to same;	0.60
Aug-01-25	N. Levine	Work on closing documents; call with OMVIC	0.70
Aug-01-25	N. Levine	Call with client regarding outstanding issues and lien issues; review correspondence regarding same;	0.70
Aug-05-25	A. Glover	Review update regarding accidental discharge of certain Manitoba registrations;	0.10
Aug-05-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.20
Aug-05-25	T. Li	Correspondence with working group in respect of Manitoba regarding-registration; review of lien summaries and attending to discharge and security related matters;	1.10
Aug-05-25	M. Clarkson-Maciel	Reviewing and considering documentation regarding wings freightway Inc., I-way transport Inc, and 2834021 Ontario inc obligor letters; reviewing correspondence between Monitor and BDO regarding the same and MCV resolutions;	0.40
Aug-05-25	E. Hyderman	Revising recitals and signature page of settlement agreement; discussion with N. Levine regarding same; reviewing August 1, 2025, endorsement;	0.80
Aug-05-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges;	0.10
Aug-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Aug-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 2 VINS; conducting searches;	0.20
Aug-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Aug-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining	0.30

Date	Name	Description	Hours
		and reviewing initial search results;	
Aug-05-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Aug-05-25	C. Pendrith	Review settlement documents and discuss same with N. Levine and A&M team;	0.50
Aug-05-25	S. Kukulowicz	Telephone attendance with N. Levine regarding update on various issues; review of related email;	0.20
Aug-05-25	N. Levine	Revise settlement; discussion with client regarding same; internal discussion regarding same; call to Fasken regarding lien issues; address US POA issues; review lease spreadsheet;	2.50
Aug-06-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.70
Aug-06-25	T. Li	Review of Manitoba regarding-registration; review of lien summaries and attending to related lien discharge and security matters;	1.60
Aug-06-25	H. Dylewski	Correspondence with client with respect to PPSA discharge confirmations relating to RBC syndicate liens pertaining Sales 200, 212, 209 and 186;	0.40
Aug-06-25	M. Clarkson-Maciel	correspondence regarding redbox order; reviewing documentation received via service list to determine relevance to manager;	0.40
Aug-06-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; discussion with T. Li regarding status of Manitoba PPSA registration as against Pride Truck Sales Ltd.;	0.50
Aug-06-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Aug-06-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 2 VINS; obtaining and reviewing search results;	0.20
Aug-06-25	A. Slota	Attending to ongoing Ontario, Alberta and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Aug-06-25	A. Slota	Attending to ongoing Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Aug-06-25	A. Slota	Attending to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Aug-06-25	N. Levine	Work on lien discharge issues; address lease matters; calls with client regarding same;	1.20
Aug-07-25	E. Curtis	Reviewing active sale notices;	1.40
Aug-07-25	A. Glover	Review draft discharges for sales 016(C), 135, 113, 203 and 182(A); Review bringdown searches in respect of sale 110(B) and flag potential incoming financier's lien to A&M;	2.00

Date	Name	Description	Hours
Aug-07-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.40
Aug-07-25	E. Hyderman	Finalize execution version of the Ryson settlement agreement; correspondence with N. Levine regarding same;	0.30
Aug-07-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 189; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Aug-07-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Aug-07-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Aug-07-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Aug-07-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 2 VINS; conducting searches;	0.20
Aug-07-25	T. Konechny	Attend to drafting and filing BC, Alberta, and Saskatchewan PPSA partial discharges in respect of sale 189;	0.30
Aug-07-25	N. Levine	Work on settlement issues; calls with client; address lease issues; address lien discharge matters	0.80
Aug-08-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.50
Aug-08-25	A. Glover	Report to A&M in respect of sales 016(C), 113 and 203; update internal trackers to reflect completion of sale;	1.20
Aug-08-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to non-syndicate liens pertaining Sale 187;	0.30
Aug-08-25	H. Dylewski	Preparing draft MB PPSA discharge financing statements relating to RBC syndicate liens pertaining Sales 212, 209, 200, 186 and 189; attending to the registration of financing statements; receiving verification statements of same; providing report of same;	0.80
Aug-08-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 172; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.90
Aug-08-25	E. Hyderman	Distributing settlement agreement for execution; correspondence with N. Levine and Manager team regarding same;	0.20
Aug-08-25	J. Trinh	Attending to registration of non-syndicate RBC lien pertaining to Sale 135; receiving and reviewing confirmation/verifcation of same;	0.30
Aug-08-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 214;	0.20

Date	Name	Description	Hours
Aug-08-25	J. Trinh	Attending to registration of non-syndicate RBC lien pertaining to Sale 16C; receiving and reviewing confirmation/verification of same;	0.30
Aug-08-25	J. Trinh	Attending to registration of non-syndicate RBC lien pertaining to Sale 203; receiving and reviewing confirmation/verification of same;	0.30
Aug-08-25	J. Trinh	Attending to registration of PPSA partial discharges in respect of RBC Syndicate lien registrations pertaining to Sale 214;	0.80
Aug-08-25	J. Trinh	Attending to registration of PPSA partial discharges in respect of RBC Syndicate lien registrations pertaining to Sale 107(B);	0.80
Aug-08-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 107(B);	0.20
Aug-08-25	J. Trinh	Attending to registration of non-syndicate RBC lien pertaining to Sale 113; receiving and reviewing verification of same;	0.20
Aug-08-25	J. Trinh	Attending to registration of non-syndicate RBC lien pertaining to Sale 182; receiving and reviewing confirmation/verification of same;	0.30
Aug-08-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 172;	0.20
Aug-08-25	S. Kukulowicz	Telephone attendance with N. Levine regarding releases of liens in connection with auctions; review of related emails;	0.40
Aug-08-25	N. Levine	Address lease buy out issues; finalize settlement; calls with client; calls with Cassels team regarding order and real estate issues; address lien release matters	1.70
Aug-11-25	E. Curtis	Reviewing correspondence;	0.20
Aug-11-25	A. Glover	Review correspondence regarding upcoming sale notices;	0.20
Aug-11-25	T. Li	Review and consider lien summaries; correspondence with working group in respect of certain sale transactions; attending to discharge and related security matters;	0.80
Aug-11-25	E. Hyderman	Reviewing correspondence from opposing counsel regarding status of settlement agreement execution;	0.10
Aug-11-25	J. Noel	Review draft PPSA discharges regarding lien releases.	0.30
Aug-11-25	H. Dylewski	Attending to the registration of PPSA discharge financing statements relating to non-syndicate liens pertaining Sale 187; receiving confirmations and verification statements of same; correspondence with working group with respect to same;	0.60
Aug-11-25	H. Dylewski	Attending to an ON PPSA VIN search; receiving and reviewing results of same; correspondence with working group with respect to same;	0.20
Aug-11-25	M. Clarkson-Maciel	Correspondence regarding dispute with Tpine lessees;	0.10
Aug-11-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Aug-11-25	A. Slota	Attending to Ontario, Manitoba and Saskatchewan PPSA	0.30

Date	Name	Description	Hours
		VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	
Aug-11-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 2 VINS; obtaining and reviewing search results;	0.20
Aug-11-25	N. Levine	Address lease issues; follow up with counsel to additional leases; address lien issues; work on settlement issues;	1.70
Aug-11-25	A. Slota	Attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.30
Aug-11-25	A. Slota	Attending to Ontario PPSA VIN due diligence search request matters in respect of 2 VINS; obtaining and reviewing search results;	0.20
Aug-11-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Aug-11-25	A. Slota	Attending to ongoing Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Aug-12-25	E. Curtis	Reviewing correspondence; reviewing draft discharge;	0.30
Aug-12-25	A. Glover	Review searches, order draft discharges and flag incoming financiers lien to A&M regarding sale 186; review discharges and report to A&M regarding sale 182; review searches and provide instructions to clerks regarding discharges for sale 189; flag incoming financiers lien to A&M for sale 189;	3.10
Aug-12-25	T. Li	Review and consider lien summaries; correspondence with working group in respect of certain sale transaction and Quebec due diligence; attending to discharge and related security matters;	0.70
Aug-12-25	J. Noel	Review draft PPSA discharges and PPSA search results regarding lien releases;	1.60
Aug-12-25	K. Seo	Attending to administrative matters; updating sale trackers;	2.80
Aug-12-25	E. Hyderman	Compiling executed settlement agreement signature pages; correspondence with N. Levine regarding unaccounted for signature; reviewing correspondence with opposing counsel regarding same; correspondence with Cassels team and the Manager regarding compiled fully executed settlement agreement; reviewing correspondence regarding VIN to be returned;	0.50
Aug-12-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	1.10
Aug-12-25	H. Dylewski	Preparing draft ON PPSA financing change statement relating to non-syndicate liens pertaining Sale 189; attending to the registration of PPSA financing statement; receiving confirmation and verification statement of same; correspondence with working group with respect to same;	0.50

Date	Name	Description	Hours
Aug-12-25	H. Dylewski	Attending to the registration of PPSA financing change statement relating to non-syndicate liens pertaining Sale 182(A);	0.20
Aug-12-25	T. Konechny	Attend to drafting Saskatchewan PPSA discharges for non-RBC liens in respect of sale 212;	0.20
Aug-12-25	N. Levine	Work on lease issues; address Redbox truck; multiple calls with client; address settlement issues; address lien issues;	1.70
Aug-13-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 116;	0.40
Aug-13-25	E. Curtis	Updating correspondence; reviewing draft discharge;	0.60
Aug-13-25	A. Glover	Review draft discharges in respect of sale 212; report to A&M regarding sale 189; correspondence with clerks regarding sale 186;	0.70
Aug-13-25	T. Li	Discussions with J. Noel and S. Rothery in respect of certain discharged securitization registration and correspondence and calls with N. Levine and client regarding same; discuss further with N. Levine and review of correspondence with counsel to RBC securitization team and collateral manager; review of lien summaries and attending to related lien discharge and priority review matters;	1.50
Aug-13-25	J. Noel	Review draft PPSA discharges and PPSA search results regarding lien release; discussions with Cassels team regarding discharged Tpine securitization lien;	1.10
Aug-13-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.10
Aug-13-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	1.10
Aug-13-25	H. Dylewski	Preparing draft ON PPSA financing change statements relating to non-syndicate liens pertaining Sale 186;	0.40
Aug-13-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 116; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.70
Aug-13-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 220; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Aug-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Aug-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20

Date	Name	Description	Hours
Aug-13-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 220;	0.40
Aug-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Aug-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 2 VINS; conducting, searches;	0.20
Aug-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, British Columbia and Alberta PPSA VIN due diligence search request matters in respect of 2 VINS; conducting, obtaining and reviewing initial search results;	0.40
Aug-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Manitoba and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Aug-13-25	C. Potter	Matters regarding PPSA registrations and discharge issue; correspondence regarding the same;	0.40
Aug-13-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 2 VINS; conducting, obtaining and reviewing initial search results;	0.30
Aug-13-25	N. Levine	Address lease issues; work on lien discharge matters; consider next steps; work on settlement issues;	2.70
Aug-14-25	E. Curtis	Internal correspondence;	0.10
Aug-14-25	A. Glover	Review draft discharges and report to A&M regarding sale 189;	0.70
Aug-14-25	J. Noel	Review PPSA search results regarding lien releases; discussions with Cassels team regarding PPSA search results;	0.50
Aug-14-25	M. Clarkson-Maciel	Reviewing correspondence and documentation related to claims from 223526 Alberta Ltd regarding rental agreements with Pride Fleet Solutions;	0.50
Aug-14-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to prepare draft discharges; correspond with client regarding lien discharges;	0.70
Aug-14-25	A. Slota	Attending to ongoing Ontario, Manitoba and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Aug-14-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 2 VINS; obtaining and reviewing search results;	0.20
Aug-14-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN;	0.20

Date	Name	Description	Hours
Aug-14-25	A. Slota	obtaining and reviewing balance of all search results; Attending to ongoing Ontario, British Columbia and Alberta PPSA VIN due diligence search request matters in respect of 2 VINS; obtaining and reviewing balance of all search results, further to same;	0.40
Aug-14-25	A. Slota	Attending to ongoing Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Aug-14-25	A. Slota	Attending to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 2 VINS; obtaining and reviewing balance of all search results;	0.30
Aug-14-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Aug-14-25	T. Konechny	Attend to filing Saskatchewan PPSA discharges for non-RBC liens in respect of sale 212;	0.20
Aug-14-25	T. Konechny	Conduct ON PPSA search to review against 1 VIN;	0.10
Aug-14-25	S. Kukulowicz	Review of emails and telephone attendance with N. Levine regarding 3rd party payment for a different party's truck;	0.20
Aug-14-25	N. Levine	Multiple calls with client regarding lease issues; address inquiry from additional lease; consider full service lease issues with client; address stipulation;	1.90
Aug-15-25	A. Glover	Review status of vehicles listed in schedule B to settlement and mutual release between A&M and Ryson;	0.90
Aug-15-25	T. Li	Calls and correspondence with working group in respect of Tpine regarding-registration, lien summaries and Ryson settlement; review of PPSA search results and bring-down due diligence; attending to lien discharge and security related matters;	0.90
Aug-15-25	J. Noel	Discussions with Cassels team regarding PPSA search results and lien releases; review PPSA search results; review draft PPSA discharges regarding lien releases;	1.00
Aug-15-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.00
Aug-15-25	E. Hyderman	Discussion with N. Levine regarding draft limited power of attorney stipulation; review and comment on same; review orders and motion materials on the Monitor's website regarding the definition of the RBC Bilat collateral; review the fourth amended credit agreement in connection with same; correspondence with N. Levine regarding same;	2.90
Aug-15-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	0.30
Aug-15-25	H. Dylewski	Receiving ON PPSA VIN search results; correspondence with working group with respect to same; preparing draft ON PPSA financing change statement relating to Sale 187;	0.40
Aug-15-25	M. Clarkson-Maciel	Reviewing emails; considering issues related to IFT leases;	0.30
Aug-15-25	N. Levine	Calls regarding missing truck; confer with client regarding	3.40

Date	Name	Description	Hours
		sanctions issues; confer with counsel to creditor; address lien issues; confer with Cassels team regarding same; call with Osler regarding new lien issues; calls with Cassels team regarding PPSA issues;	
Aug-15-25	M. Clarkson-Maciel	Correspondence regarding enforcement of leased assets to 2834021 Ontario Inc from Tpine; considering issues;	0.30
Aug-16-25	E. Hyderman	Reviewing correspondence from regarding draft stipulation regarding US omnibus PoA;	0.10
Aug-16-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 221;	0.20
Aug-16-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 217;	0.20
Aug-16-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 216;	0.20
Aug-16-25	N. Levine	Revise stipulation and correspond with US counsel; call with client;	0.50
Aug-18-25	A. Glover	Review securitization registration to determine if VINs listed in Schedule B to agreement with Ryder were included therein;	0.50
Aug-18-25	J. Trinh	Attending to registration of PPSA partial discharges in respect of RBC Syndicate lien registrations pertaining to 217;	0.80
Aug-18-25	T. Li	Correspondence with working group in respect of lien discharges; review lien discharge summaries and attending to security review and discharge-related matters;	0.90
Aug-18-25	J. Noel	Discussions with Cassels team regarding lien releases;	0.20
Aug-18-25	E. Hyderman	Reviewing correspondence regarding comments on the draft stipulation; reviewing correspondence regarding proper allocation of servicing responsibilities;	0.20
Aug-18-25	H. Dylewski	Attending to the registration of PPSA discharge financing statement relating to non-syndicate liens pertaining Sale 187; receiving confirmation and verification statement of same; correspondence with working group with respect to same;	0.40
Aug-18-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 216; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.60
Aug-18-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 221; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.70
Aug-18-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to file discharges;	0.40
Aug-18-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 216;	0.40
Aug-18-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 221;	0.50

Date	Name	Description	Hours
Aug-18-25	C. Potter	Matters regarding regarding-registration and discharge issue; calls regarding the same;	0.60
Aug-18-25	S. Kukulowicz	Emails and discussions regarding discharge of Tpine VINs;	0.50
Aug-18-25	N. Levine	Correspondence regarding RSLA issues; address missing truck issues; confer with Cassels and secured lender counsel regarding registration issue; review correspondence regarding support from Pride entities; draft additional emails regarding lien issues; confer with client; confer with US counsel regarding POA; call with company counsel regarding correspondence and lease matters;	2.80
Aug-19-25	E. Curtis	Internal correspondence;	0.10
Aug-19-25	A. Glover	Report to A&M regarding completion of Sale 209;	0.20
Aug-19-25	J. Trinh	Receiving PPSA VIN search results in respect of Sale 217 and providing report with respect to same;	0.20
Aug-19-25	J. Trinh	Receiving PPSA VIN search results in respect of Sale 216 and providing report with respect to same;	0.20
Aug-19-25	J. Trinh	Receiving PPSA VIN search results in respect of Sale 221 and providing report with respect to same;	0.20
Aug-19-25	T. Li	Correspondence with working group in respect of lien discharges; review lien discharge summaries and attending to security review and discharge-related matters;	0.50
Aug-19-25	M. Clarkson-Maciel	Correspondence and considering issues regarding dispute with Tpine lessees and alleged obligations of Tpine to maintain trucks; analysis of legal arguments made by counsel to lessees;	1.20
Aug-19-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges;	0.20
Aug-19-25	N. Levine	Calls regarding missing truck matters; draft email regarding registration; address service issues; confer with Cassels team regarding contracts;	1.60
Aug-20-25	T. Li	Correspondence with working group in respect of lien discharges; review lien discharge summaries and attending to security review and discharge-related matters; consider sale by U.S. entity and review of orders regarding same;	1.20
Aug-20-25	M. Clarkson-Maciel	Correspondence and considering issues regarding dispute with Tpine lessees and alleged obligations of Tpine to maintain trucks;	0.40
Aug-20-25	M. Clarkson-Maciel	coordinating meeting regarding RSLA liens with BDO, Monitor and company; awaiting responses regarding the same;	0.80
Aug-20-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	2.00
Aug-20-25	N. Levine	Review leases; confer with company counsel; confer with client; address lien issues; work on RSLA issues; address truck matters;	1.60
Aug-21-25	K. Seo	Attending to administrative matters; updating sale trackers;	2.20

Date	Name	Description	Hours
Aug-21-25	A. Glover	Review correspondence regarding upcoming sale notices and potential sales;	0.10
Aug-21-25	T. Li	Correspondence with working group in respect of lien discharges; review lien discharge summaries and attending to security review and discharge-related matters; consider sale by U.S. entity and review of orders regarding same; send issues summary to working group for further consideration by N. Levine and C. Potter;	2.10
Aug-21-25	J. Noel	Discussion with T. Li regarding ongoing US vehicle diligence;	0.40
Aug-21-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 218; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Aug-21-25	H. Dylewski	Receiving comments and revising draft financing change statement relating to Sale 186;	0.20
Aug-21-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 226; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Aug-21-25	M. Clarkson-Maciel	Conference with N. Levine regarding RSLA Liens; conference with N. Levine regarding claims that Manager is obligated to replace trucks subject to securitisation program; drafting response to counsel to 2834021 Ontario Inc; analyzing lease documentation related to 2834021 Ontario Inc., and documentation provided by 2834021 Ontario's counsel; considering issues;	3.70
Aug-21-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to prepare draft discharges; correspond with client regarding lien discharges;	1.20
Aug-21-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 218;	0.40
Aug-21-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 226;	0.40
Aug-21-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 226;	0.20
Aug-21-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 218;	0.20
Aug-21-25	N. Levine	Address missing truck issues; work on lease matters; calls with client, team and opposing counsel regarding same; review motion materials; work on POA matters;	2.50
Aug-22-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.60
Aug-22-25	A. Glover	Review correspondence regarding upcoming sale notices and potential sales;	0.30
Aug-22-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 227;	0.20
Aug-22-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 231;	0.20

Date	Name	Description	Hours
Aug-22-25	M. Clarkson-Maciel	Conference with monitor, counsel to BDO, and counsel to the company regarding RSLA lien claim process; consideration of issues regarding the same; considering issues related to management property assets and set off claims against them;	1.20
Aug-22-25	E. Hyderman	Reviewing and summarizing served Motion Record of the applicants; correspondence with Cassels team regarding same; correspondence with the Manager team regarding attendance;	0.80
Aug-22-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges;	0.20
Aug-22-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 230;	0.20
Aug-22-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 228;	0.20
Aug-22-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 229;	0.20
Aug-22-25	J. Trinh	Receiving results of PPSA VIN searches in respect of Sale 226 and providing report with respect to same;	0.20
Aug-22-25	S. Kukulowicz	Review of summary of motion materials for August 28 hearing;	0.20
Aug-22-25	N. Levine	Work on RSLA issues; call with company regarding same; address lease issues; review report; calls with Cassels team;	1.60
Aug-25-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.00
Aug-25-25	T. Li	Correspondence with working group in respect of lien discharges; review lien discharge summaries and attending to security review and discharge-related matters;	0.80
Aug-25-25	M. Clarkson-Maciel	Conference with A&M regarding outstanding items; correspondence with counsel to the Company regarding leasebook email inbox; correspondence with counsel to the company regarding letters to leasebook lessees; considering issues regarding allegations from 2834021 Ontario Inc regarding obligations owed by A&M under leases; conference with T. Li regarding PPSA discharges by Osler; considering RSLA lien issues; drafting correspondence regarding RSLA lien issues;	2.80
Aug-25-25	E. Hyderman	Reviewing correspondence from the Manager regarding attendance at August 28, 2025, hearing;	0.10
Aug-25-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	0.20
Aug-25-25	C. Potter	Matters regarding US entity and related sale matters; correspondence regarding the same;	0.30
Aug-25-25	J. Trinh	Receiving PPSA VIN searches in respect of Sale 229 and providing report with respect to same;	0.20
Aug-25-25	J. Trinh	Receiving PPSA VIN searches in respect of Sale 231 and providing report with respect to same;	0.20
Aug-25-25	J. Trinh	Receiving PPSA VIN searches in respect of Sale 228 and providing report with respect to same;	0.20
Aug-25-25	J. Trinh	Receiving PPSA VIN searches in respect of Sale 227 and	0.20

Date	Name	Description	Hours
Aug-25-25	J. Trinh	providing report with respect to same; Receiving PPSA VIN searches in respect of Sale 230 and providing report with respect to same;	0.20
Aug-25-25	N. Levine	Correspondence regarding liens and assets; confer with team regarding lease issues	0.50
Aug-26-25	K. Seo	Attending to administrative matters; updating sale trackers;	2.10
Aug-26-25	E. Curtis	Reviewing correspondence;	0.20
Aug-26-25	A. Glover	Review correspondence regarding upcoming sale notices and potential sales;	0.30
Aug-26-25	J. Trinh	Attending to registration of PPSA partial discharges in respect of RBC Syndicate lien registrations pertaining to Sale 222;	0.80
Aug-26-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 229; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Aug-26-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 227; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Aug-26-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 223; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Aug-26-25	M. Clarkson-Maciel	drafting correspondence with VK law regarding claims that manager must supply additional vehicles; correspondence with A&M regarding workstreams; internal conference regarding strategy; considering issues related to 2834021 Ontario's allegations;	1.50
Aug-26-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to order PPSA searches; correspond with client regarding lien discharges;	0.80
Aug-26-25	T. Konechny	Attend to drafting and filing PPSA partial discharges in respect of sale 22(D);	0.80
Aug-26-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 227;	0.40
Aug-26-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 229;	0.40
Aug-26-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 223;	0.40
Aug-26-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Saskatchewan and Alberta PPSA VIN due diligence search	0.40

Date	Name	Description	Hours
		request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	
Aug-26-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1VIN; conducting, obtaining and reviewing initial search results;	0.20
Aug-26-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Aug-26-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of the following: 3HSDZAPR2PN526009; conducting searches, further to same;	0.20
Aug-26-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of the following: 1XKYDP9X9PJ239698; conducting, obtaining and reviewing initial search results, further to same;	0.20
Aug-26-25	N. Levine	Work on email to lease;	0.40
Aug-27-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.20
Aug-27-25	E. Curtis	Updating internal tracking;	0.20
Aug-27-25	A. Glover	Review correspondence regarding potential sales and upcoming sale notices;	0.10
Aug-27-25	T. Li	Correspondence with client in respect of Alberta repossession and title disclosure protocol; correspondence with S. Rothery and law clerks in respect of search products and privacy issues regarding same; research and review Alberta motor vehicle information legislation and subordinate regulation; summarize same and discussion with internal working group regarding possible avenues of information retrieval; review of lien summaries and attending to security and discharge-related matters;	4.50
Aug-27-25	M. Clarkson-Maciel	Correspondence regarding dispute with 2223526 Alberta Ltd rental with pride fleet solutions; research and discussion regarding the same;	0.60
Aug-27-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 045; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Aug-27-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 230; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Aug-27-25	E. Hyderman	Reviewing correspondence from N. Levine regarding further comments on the draft stipulation; reviewing draft revised	0.20

Date	Name	Description	Hours
Aug-27-25	S. Rothery	stipulation; Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; correspond with client regarding lien discharges; discussion with T. Li regarding scope of diligence required on vehicles titled to Tpine Leasing Capital L.P.; discussion with T. Li regarding motor vehicle title searches in Alberta;	1.90
Aug-27-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 3 VINS; conducting search results;	0.30
Aug-27-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting search results;	0.20
Aug-27-25	A. Slota	Attending to ongoing Ontario, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Aug-27-25	A. Slota	Attending to ongoing Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Aug-27-25	A. Slota	Attending to ongoing Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Aug-27-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 230;	0.40
Aug-27-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 45;	0.40
Aug-27-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting search results;	0.20
Aug-27-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting search results;	0.20
Aug-27-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Aug-27-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Aug-27-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PSA VIN due diligence search request matters in respect of 1 VIN; conducting search results;	0.20
Aug-27-25	J. Trinh	Attending to registration of PPSA partial discharges in respect of RBC Syndicate lien registrations pertaining to Sale 225;	0.80
Aug-27-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 224;	0.20
Aug-27-25	J. Trinh	Attending to MTO VIN searches in respect of 23 VINS and	0.50

Date	Name	Description	Hours
Aug-27-25	J. Trinh	providing report with respect to same; Attending to registration of PPSA partial discharges in respect of RBC Syndicate lien registrations pertaining to Sale 224;	1.20
Aug-27-25	N. Levine	Address missing truck issues; comment on email to leasee; address POA issues; correspondence regarding ownership issues and searches; address additional lease issues	1.20
Aug-28-25	A. Glover	Review correspondence regarding upcoming sale notices and potential sales;	0.20
Aug-28-25	J. Noel	Review draft PPSA registrations and due diligence searches regarding lien releases;	1.00
Aug-28-25	M. Clarkson-Maciel	Conference with counsel to 2223526 AB Limited regarding rental agreement with Pride Fleet Solutions and Tpine; considering Manager's position regarding documentation on the same; providing advice on negotiations and update to Manager; correspondence regarding the same;	0.80
Aug-28-25	E. Hyderman	Reviewing correspondence regarding signing of the draft stipulation;	0.10
Aug-28-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 3 VINS; obtaining and reviewing all search results;	0.30
Aug-28-25	A. Slota	Attending to ongoing Ontario and Alberta PSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Aug-28-25	A. Slota	Attending to ongoing Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Aug-28-25	A. Slota	Attending to ongoing Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Aug-28-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing all search results;	0.20
Aug-28-25	J. Trinh	Receiving results of PPSA VIN searches in respect of Sale 224 and providing report with respect to same;	0.20
Aug-28-25	N. Levine	Address POA issues; emails regarding updated schedule to CMO;	0.80
Aug-29-25	J. Noel	Review PPSA searches and draft registrations regarding lien releases;	1.60
Aug-29-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to file lien discharges;	0.30
Aug-29-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting search results;	0.20
Aug-29-25	J. Trinh	Attending to registration of non-RBC lien PPSA discharges in	0.20

Date	Name	Description	Hours
		respect of sale 214; receiving and reviewing confirmation/verification of same;	
Aug-29-25	S. Kukulowicz	Review of emails and discussion with N. Levine regarding US stipulation and POA issues;	0.40
Aug-29-25	N. Levine	Call with client; call with Cassels team; emails regarding missing truck	1.00

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Potter, Carla	Partner	1.30	840.00	1,092.00
Pendrith, Colin	Partner	0.50	950.00	475.00
Levine, Natalie	Partner	33.50	1,025.00	34,337.50
Kukulowicz, Shayne	Partner	1.90	1,650.00	3,135.00
Seo, Kevin	Associate	15.00	500.00	7,500.00
Curtis, Erin	Associate	3.10	500.00	1,550.00
Glover, Anna	Associate	10.60	500.00	5,300.00
Li, Timon	Associate	16.60	550.00	9,130.00
Hyderman, Eva	Associate	6.30	500.00	3,150.00
Noel, J'Davia	Associate	7.70	525.00	4,042.50
Clarkson-Maciel, Matteo	Associate	16.20	700.00	11,340.00
Rothery, Shae	Associate	11.10	500.00	5,550.00
Konechny, Tiffany	Law Clerk / Paralegal	6.10	465.00	2,836.50
Trinh, Julia	Law Clerk / Paralegal	12.10	515.00	6,231.50
Dylewski, Hannah	Law Clerk / Paralegal	12.70	415.00	5,270.50
Slota, Alex	Law Clerk / Paralegal	14.10	465.00	6,556.50
TOTAL (CAD)		168.80		107,497.00

Our Fees 107,497.00

Less Discount (10,749.70)

Total Fees 96,747.30

HST @ 13.00% 12,577.15

TOTAL FEES & TAXES (CAD) 109,324.45

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

PPSA - Registration/Applic./Discharges	1,749.40
Electronic Due Diligence	801.50
BC Online - PPSA Search/Registrations	241.50
Driver's License Searches	322.00
Corporate Filings	264.00
Total Non-Taxable Disbursements	3,378.40

Taxable Disbursements

PPSA - Registration/Applic./Discharges	7,136.20
Electronic Due Diligence	1,607.50
Agency Fees and Disbursements	2,069.00
Total Taxable Disbursements	10,812.70
HST @ 13.00%	1,405.65
Total Taxable Disbursements & Taxes	12,218.35

TOTAL DISBURSEMENTS & TAXES (CAD)	15,596.75
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TOTAL FEES	96,747.30
TOTAL DISBURSEMENTS	14,191.10
TOTAL TAXES	13,982.80
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	124,921.20



Attn: Douglas McIntosh
Alvarez & Marsal Canada Inc., in its capacity as
Court-Appointed Manager over certain property of
TPine Leasing Capital Corporation et al.
200 Bay Street, Suite 3501
Royal Bank Plaza, South Tower
Toronto, ON M5J 2J1

Invoice No: 2299396
Date: October 20, 2025
Matter No.: 059366-00005
GST/HST No.: R121379572

Lawyer: Kukulowicz, Shayne
Tel.: (416) 860-6463
E-mail: SKukulowicz@cassels.com

Re: Court-appointment as Manager of certain assets of the Pride Group

Fees for professional services rendered up to and including September 30, 2025

Our Fees	195,660.00
Less Discount	(19,566.00)
Total Fees	176,094.00
Disbursements	10,617.55
Total Fees and Disbursements	186,711.55
HST @ 13.00%	23,901.48
TOTAL DUE (CAD)	210,613.03

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ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

Online Bill Payments:

Vendor name is **Cassels Brock Blackwell LLP** and
you are required to enter the first six digits of the
matter #

Invoice No: 2299396
Matter No.: 059366-00005

Amount: **CAD 210,613.03**

e-Transfer Payments: payments@cassels.com

Credit Card Payments: payments.cassels.com

Cassels Brock Blackwell LLP | cassels.com

Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL			
Date	Name	Description	Hours
Sep-02-25	E. Hyderman	Reviewing correspondence regarding preparation of the Manager's second report; reviewing correspondence regarding damage to certain collateral; discussion with N. Levine and M. Clarkson-Maciel regarding process; reviewing correspondence regarding draft POA stipulation;	0.50
Sep-02-25	T. Li	Review of lien summaries, correspondence with working group and attending to related due diligence and security matters;	1.00
Sep-02-25	M. Clarkson-Maciel	Conference with A&M regarding outstanding points on claims from leasees; considering release waivers related to the same; advice regarding potential order; internal conference regarding current work streams;	0.60
Sep-02-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Sep-02-25	J. Oliver	Meeting with P. Sutton regarding AMVIR status; reviewing and considering the same; drafting email to T. Li regarding the same;	0.50
Sep-02-25	C. Potter	Matters regarding disposition of U.S. owned collateral and correspondence regarding the same; matters regarding PPSA discharges and correspondence regarding the same;	0.50
Sep-02-25	N. Levine	Review updated documents; report issues; review issues; internal call; revise stipulation; call regarding RSLA liens; call with client; address liquidity issues; review outline; call leaseholder;	2.20
Sep-03-25	T. Li	Review of lien summaries, correspondence with working group and attending to related due diligence and security matters;	0.70
Sep-03-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	0.20
Sep-03-25	C. Potter	Matters regarding PPSA discharges and related items; correspondence regarding the same;	0.30
Sep-03-25	S. Kukulowicz	Review of emails regarding Omnibus POA and discussed same with N. Levine;	0.20
Sep-03-25	N. Levine	Call with S. Grant; consider report outline; emails regarding lien issues; confer with team regarding next steps;	0.60
Sep-04-25	E. Hyderman	Preparing for and attending call with client regarding file status and preparation of the Manager's Second report; reviewing and formatting notes in connection with same; correspondence with N. Levine regarding same; reviewing correspondence filed in the DMS to identify letters sent and received over the course of the file to be included in the Second Report;	2.50
Sep-04-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.60
Sep-04-25	T. Li	Correspondence with client in respect of various	2.80

Date	Name	Description	Hours
		outstanding sale and due diligence matters; review of AMVIR and correspondence with Calgary specialists regarding Alberta due diligence and search matters; review of ongoing sale and discharge requests and attending to other due diligence and security matters;	
Sep-04-25	J. Noel	Review draft PPSA discharge regarding lien releases.	0.20
Sep-04-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 233; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.90
Sep-04-25	M. Clarkson-Maciel	Conference regarding Monitor's Second Report; reviewing correspondence regarding contents of Manager's report;	2.10
Sep-04-25	A. Im	Receiving and reviewing instructions; attending to corporate and security searches in respect of 2834021 Ontario Inc., I-Way Transport Inc., and Wings Freightway Inc.; obtaining copies of corporate documents; reviewing initial search results and preparing report with respect to same; email correspondence with working group;	0.80
Sep-04-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	0.20
Sep-04-25	J. Trinh	Attending to MTO VIN searches in respect of 23 VINS and providing report with respect to same;	0.60
Sep-04-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Saskatchewan PSA VIN due diligence search request matters in respect of the following: 5YJSA1E54NF485736; conducting, obtaining and reviewing initial search results;	0.20
Sep-04-25	N. Levine	Revise stipulation; prepare for call; call with Cassels team; emails regarding ownerships; call with client;	1.80
Sep-04-25	S. Kukulowicz	Review of outline for Second Report and discussed same with N. Levine; teams conference with A&M regarding various issues to include in Second Report; review of updated Schedule "D" and related emails;	1.90
Sep-05-25	A. Glover	Review searches in respect of sale 172 and order discharges in respect of same; review searches in respect of sale 200 and report to A&M in respect of same;	0.70
Sep-05-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	0.30
Sep-05-25	E. Hyderman	Continuing to review filed correspondence append to the manager's second report; correspondence with M. Clarkson-Maciel regarding same;	1.00
Sep-05-25	T. Li	Correspondence with working group in respect of AMVIR request; extensive review of AMVIR and related legislation in respect of motor vehicle ownership / title disclosures; review of lien summaries and attending to related due diligence and security matters;	3.80

Date	Name	Description	Hours
Sep-05-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 231;	0.20
Sep-05-25	J. Trinh	Preparing draft PPSA partial discharges in respect of non-RBC Syndicate lien registration pertaining to Sale 172;	0.20
Sep-05-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.50
Sep-05-25	J. Noel	Review PPSA search results regarding lien releases;	0.90
Sep-05-25	M. Clarkson-Maciel	Review of letters and correspondence regarding management property; considering response from counsel to Tpine lessees regarding alleged truck replacement obligations;	1.00
Sep-05-25	A. Im	Attending ongoing due diligence searches; reviewing balance of search results and preparing report with respect to same; email correspondence with working group;	0.30
Sep-05-25	A. Slota	Attending to ongoing Ontario and Saskatchewan PSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Sep-05-25	N. Levine	Comment on agreement; call with client regarding same; correspondence regarding lease issues and potential resolution; emails regarding PMSI; emails regarding ownerships;	1.70
Sep-05-25	J. Trinh	Attending to registration of PPSA partial discharges in respect of RBC Syndicate lien registrations pertaining to Sale 231;	0.50
Sep-05-25	S. Kukulowicz	Review of communications regarding truck leases and attempts to avoid payments;	0.30
Sep-06-25	E. Curtis	Archiving documents and reviewing open sales;	0.20
Sep-07-25	T. Li	Correspondence with working group in respect of AMVIR request; extensive review of AMVIR and related legislation in respect of motor vehicle ownership / title disclosures; review of lien summaries and attending to related due diligence and security matters;	4.50
Sep-08-25	T. Li	Correspondence with working group in respect of AMVIR request; review of AMVIR agreement, regulations and subordinate policies and procedures; call with S. Rothery and K. Seo in respect of AMVIR submissions and disclosure research; draft AMVIR submissions; review of lien summaries and attending to related due diligence and security matters;	5.40
Sep-08-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.20
Sep-08-25	H. Dylewski	Preparing draft PPSA discharge financing statement relating to non-syndicate liens pertaining Sale 227;	0.20
Sep-08-25	M. Clarkson-Maciel	Conference regarding alleged claims by 2834021 Ontario against the manager; drafting correspondence regarding the same; advising client regarding potential claims; advising client regarding correspondence regarding the same;	2.40
Sep-08-25	S. Rothery	considering related issues; correspondence regarding VIN; Attend to PPSA matters; update internal status tracking	1.30

Date	Name	Description	Hours
Sep-08-25	J. Trinh	sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; discussion with T. Li regarding Alberta vehicle title searches;	0.30
Sep-08-25	J. Trinh	Receiving and reviewing PPSA partial discharge confirmations/verification statements in respect of non-RBC Syndicate lien registration pertaining to Sale 231;	0.20
Sep-08-25	C. Potter	Receiving PPSA VIN searches in respect of Sale 231 and providing report with respect to same;	0.30
Sep-08-25	N. Levine	Matters regarding Alberta title information and correspondence regarding the same;	0.70
Sep-08-25	S. Kukulowicz	Emails regarding settlements; call regarding leases; emails regarding Redbox and other leases;	1.10
Sep-09-25	E. Hyderman	Teams conference with N. Levine and M. Clarkson-Maciel regarding lease litigation; reviewed and provided comments on draft email to leasee counsel; review of emails regarding expanded VIN list and other issues;	0.10
Sep-09-25	T. Li	Review correspondence regarding second report;	1.70
Sep-09-25	K. Seo	Correspondence with working group in respect of AMVIR request; review and revise AMVIR submissions; review of lien summaries and attending to related due diligence and security matters;	1.20
Sep-09-25	M. Clarkson-Maciel	Attending to administrative matters; updating sale trackers;	1.70
Sep-09-25	S. Rothery	Reviewing correspondence regarding Manager's engagement with various counterparties; collating drafts of the same; analysis regarding correspondence;	1.10
Sep-09-25	J. Oliver	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; review draft request letter to Alberta motor vehicle search agent regarding vehicle title searches; correspond with T. Li regarding same;	0.40
Sep-09-25	N. Levine	Reviewing and considering letter to AMVIR; reviewing CCAA Order regarding the same; drafting email to and reviewing e-mail from T. Li regarding the same;	0.60
Sep-10-25	A. Glover	Call regarding Alberta ownerships; review letters; consider next steps for report;	1.30
Sep-10-25	E. Hyderman	Review searches in respect of sales 216, 220 and 221 and order draft discharges and report to A&M in respect of same;	0.40
Sep-10-25	T. Li	Review and comment on summary of Manager correspondence; correspondence with M. Clarkson-Maciel regarding same;	1.20
		Correspondence with working group in respect of lien search results; review of court orders; review of draft reporting and revise same; correspondence with provincial ministry of transportation in respect of certain VIN and repossession-related due diligence; attending to security and discharge-related matters;	

Date	Name	Description	Hours
Sep-10-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.70
Sep-10-25	M. Clarkson-Maciel	Preparing chronological memo regarding correspondence; instructions on the same;	1.00
Sep-10-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	0.20
Sep-10-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Sep-10-25	J. Oliver	Drafting emails to and reviewing e-mails from T. Li, N. Levine and Provincial Vehicle Administrator regarding request for information and Court Order;	0.30
Sep-10-25	S. Kukulowicz	Review of correspondence regarding efforts to transition VINs.	0.40
Sep-11-25	A. Glover	Review correspondence regarding upcoming sale notices;	0.20
Sep-11-25	T. Li	Correspondence with working group in respect of lien search results; review of court orders; review of draft reporting and revise same; attending to security and discharge-related matters;	0.60
Sep-11-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges;	0.30
Sep-11-25	H. Dylewski	Preparing draft PPSA discharge financing statement relating to non-syndicate liens pertaining Sale 221;	0.20
Sep-11-25	H. Dylewski	Attending to the registration of AB PPSA financing change statement relating to non-syndicate liens pertaining to Sale 227; receiving verification statement of same;	0.20
Sep-11-25	M. Clarkson-Maciel	Analysis and drafting of argumentation related to claims against 2834021 Ontario Inc., Wings Freightway Inc., and I-Way Transport Inc for unpaid sums;	4.10
Sep-11-25	A. Slota	Attending to ongoing Ontario PSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Sep-11-25	N. Levine	Call with client; address litigation issues; address lien issues; work on vehicle retrieval issues;	1.00
Sep-11-25	S. Kukulowicz	Telephone attendance with N. Levine; review of emails regarding "Shunt Trucks";	0.40
Sep-12-25	M. Clarkson-Maciel	Analysis on interplay between	3.10
Sep-12-25	S. Kukulowicz	Review of analysis regarding review of response from VK Law and related emails;	0.60
Sep-12-25	N. Levine	Review materials; call with client; email with client regarding leases;	0.80
Sep-15-25	E. Curtis	Reviewing draft discharges for open sale items;	0.60

Date	Name	Description	Hours
Sep-15-25	K. Seo	Attending to administrative matters; updating sale trackers;	3.70
Sep-15-25	A. Glover	Review correspondence regarding upcoming sale notices and reporting to A&M in respect of same;	0.60
Sep-15-25	J. Noel	Discussions with Cassels team regarding lien releases; correspond with A&M regarding lien releases;	0.30
Sep-15-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to file discharges; correspond with client in respect of lien discharges;	3.00
Sep-15-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 239; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Sep-15-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 238; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.50
Sep-15-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 137(A); attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.50
Sep-15-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 237; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Sep-15-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 235; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.80
Sep-15-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 236; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.50
Sep-15-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 232; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Sep-15-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 234; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.50
Sep-15-25	A. Slota	Receiving and reviewing instructions; attending to Ontario	0.20

Date	Name	Description	Hours
Sep-15-25	A. Slota	PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches; Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Sep-15-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 237;	0.40
Sep-15-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 240;	0.40
Sep-15-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 238;	0.40
Sep-15-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 234;	0.40
Sep-15-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 137(A);	0.40
Sep-15-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Sep-15-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Sep-15-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Sep-15-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Sep-15-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Sep-15-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Sep-15-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 239;	0.40
Sep-15-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 232;	0.40
Sep-15-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 236;	0.40
Sep-15-25	N. Levine	Work on report issues; call with D. Richer; emails regarding liens;	0.50
Sep-15-25	J. Trinh	Preparing draft PPSA partial discharges in respect of non-	0.40

Date	Name	Description	Hours
		RBC Syndicate lien registration pertaining to Sale 172; receiving failed notice of registration; attending to PPSA search of registration number; receiving and reviewing results of same; preparing draft complete discharge;	
Sep-15-25	S. Kukulowicz	Exchanged emails regarding timing of A&M report and next stay extension hearing;	0.30
Sep-16-25	E. Curtis	Reviewing draft discharges for active sale notices;	1.30
Sep-16-25	A. Glover	Review discharge in respect of sale 186 and instruct clerks to file same;	0.20
Sep-16-25	E. Hyderman	Discussion with student regarding draft fee affidavit; begin preparing fee affidavit; reviewing and redacting invoices regarding same; discussions with N. Levine regarding same;	1.90
Sep-16-25	T. Li	Correspondence with working group in respect of lien search results; review of court orders; review of draft reporting and revise same; correspondence with provincial ministry of transportation in respect of certain VIN and repossession-related due diligence; review of research in respect of garage keepers' liens and special registrations on the Alberta PPSA; correspondence and calls with client regarding same; attending to security and discharge-related matters;	3.00
Sep-16-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to file discharges; correspond with client in respect of lien discharges;	5.80
Sep-16-25	M. Clarkson-Maciel	Litigation against 2834021 Ontario et al. and alleged obligations owed by TPine Leasing Capital Corporation; correspondence regarding the same;	1.60
Sep-16-25	H. Dylewski	Preparing draft ON PPSA financing change statement relating to non-syndicate liens pertaining Sale 218;	0.20
Sep-16-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 241; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.50
Sep-16-25	H. Dylewski	Attending to the registration of PPSA discharge financing statements relating to non-syndicate liens pertaining Sale 221; receiving confirmations and verification statements of same; correspondence with working group with respect to same;	0.50
Sep-16-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 240; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.50
Sep-16-25	H. Dylewski	Receiving comments and revising draft financing statement relating to non-syndicate liens pertaining Sale 186; attending to the registration of PPSA financing statements; receiving confirmations and verification statements of	0.80

Date	Name	Description	Hours
		same; attending to post-registration search; receiving results of same; correspondence with working group with respect to same;	
Sep-16-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Sep-16-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Sep-16-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Sep-16-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Sep-16-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Sep-16-25	T. Konechny	Attend to drafting non-RBC Ontario partial PPSA discharges in respect of sale 226;	0.30
Sep-16-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 241;	0.40
Sep-16-25	C. Pendrith	Review background documents; meet with Cassels team concerning dispute with I-Way entities; consider potential claims and motion to repossess trucks;	1.50
Sep-16-25	N. Levine	Emails with client; call with Osler regarding discharge; call with client regarding additional leases; prepare for call regarding unpaid leases; work on strategy; call with client regarding same; email regarding liens and POAs;	1.90
Sep-16-25	J. Trinh	Correspondence and discussions with working group with respect to matters pertaining to discharge of Ontario PPSA reference file no. 519188949;	0.50
Sep-16-25	J. Trinh	Attending to registration of complete PPSA discharge of non-RBC Syndicate lien registration pertaining to Sale 172; receiving and reviewing confirmation of same;	0.20
Sep-16-25	J. Trinh	Preparing draft PPSA partial discharges in respect of non-RBC Syndicate lien registration pertaining to Sale 116;	0.20
Sep-16-25	A. Slota	Attending to ongoing Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Sep-16-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Sep-16-25	A. Slota	Attending to ongoing Ontario, Saskatchewan and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30

Date	Name	Description	Hours
Sep-16-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Sep-16-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Sep-16-25	S. Kukulowicz	Internal discussion regarding litigation strategy on defaulted lease claims; review of lease and related contracts;	1.30
Sep-17-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.50
Sep-17-25	E. Hyderman	Continuing to review and redact invoices in connection with fee affidavit;	1.00
Sep-17-25	M. Clarkson-Maciel	Preparing for and advising on litigation regarding outstanding arrears;	4.30
Sep-17-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to file discharges; correspond with client in respect of lien discharges;	0.50
Sep-17-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Sep-17-25	A. Slota	Attending to ongoing Ontario and British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Sep-17-25	J. Trinh	Attending to MTO VIN searches and providing report of same;	0.30
Sep-17-25	N. Levine	Emails regarding liens; consider next steps on litigation;	0.30
Sep-18-25	T. Li	Correspondence with working group in respect of lien search results; review of court orders; review of draft reporting and revise same; correspondence with provincial Ministry of Transportation in respect of certain VIN and repossession-related due diligence; attending to security and discharge-related matters;	1.10
Sep-18-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to file discharges; correspond with client in respect of lien discharges; discussion with T. Li and client regarding report of seizure liens filed in Alberta;	2.80
Sep-18-25	T. Konechny	Attend to drafting non-RBC Saskatchewan PPSA discharge in respect of sale 229;	0.20
Sep-18-25	N. Levine	Call regarding report; emails regarding liens; consider potential revisions; confer with client	0.70
Sep-18-25	S. Kukulowicz	Review of emails regarding lease motion and other issues;	0.30
Sep-18-25	M. Clarkson-Maciel	Litigation regarding recovery of lease amount fund;	4.40
Sep-19-25	E. Curtis	Reviewing draft discharges of open sale notices;	0.30
Sep-19-25	E. Hyderman	Review and comment on draft fee affidavit; correspondence	2.10

Date	Name	Description	Hours
		regarding same; review and summarize motion record; correspondence with Cassels team regarding same; correspondence with Client regarding upcoming hearing;	
Sep-19-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.40
Sep-19-25	J. Noel	Review draft PPSA discharges regarding lien releases;	0.50
Sep-19-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to file discharges; correspond with client in respect of lien discharges;	2.40
Sep-19-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 243; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.60
Sep-19-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 244; attending to the registration of financing statements; receiving confirmations/verification statements of same;	0.60
Sep-19-25	H. Dylewski	Preparing draft SK PPSA financing statement relating to non-syndicate liens pertaining Sale 223;	0.20
Sep-19-25	T. Konechny	Attend to filing non-RBC Ontario PPSA discharges in respect of sale 226;	0.20
Sep-19-25	T. Konechny	Attend to drafting non-RBC Saskatchewan PPSA discharge in respect of sale 230;	0.20
Sep-19-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 243;	0.40
Sep-19-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 244;	0.40
Sep-19-25	T. Konechny	Attend to filing non-RBC Saskatchewan PPSA discharge in respect of sale 229;	0.10
Sep-19-25	T. Konechny	Attend to filing non-RBC Saskatchewan PPSA discharge in respect of sale 223;	0.10
Sep-19-25	M. Clarkson-Maciel	Instructions to students regarding workstreams; litigation recovery of outstanding amounts;	3.20
Sep-19-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Sep-19-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Sep-19-25	S. Kukulowicz	Review of Applicants' motion record for stay extension and other relief;	0.40
Sep-19-25	N. Levine	Review materials; prepare for hearing; discussions with team and client;	0.90
Sep-22-25	E. Curtis	Reviewing draft discharge;	0.30

Date	Name	Description	Hours
Sep-22-25	E. Hyderman	Review correspondence from working group regarding statement of claim;	0.10
Sep-22-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.90
Sep-22-25	T. Li	Correspondence with working group in respect of lien search results; review of court orders; review of draft reporting and revise same; attending to security and discharge-related matters;	0.70
Sep-22-25	M. Grewal	Reviewing fact pattern related to drafting of further motion; conducting due diligence on cross referencing all existent leases to note differences in material terms; summarizing findings to deliver to M. Clarkson-Maciel;	6.20
Sep-22-25	M. Clarkson-Maciel	Drafting litigation materials related to I-Wings Freightway, 2834021 Ontario, and I-Way transport; coordinating RSLA lien order with Monitor and company; considering Monitor's Report;	3.10
Sep-22-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to file discharges; correspond with client in respect of lien discharges;	1.40
Sep-22-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 242; attending to the registration of financing statements; receiving confirmations/verification statements of same;	1.00
Sep-22-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 5 VINs; conducting searches;	0.50
Sep-22-25	A. Slota	Attending to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Sep-22-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Sep-22-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Sep-22-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 242;	0.80
Sep-22-25	C. Pendrith	Communications with Cassels team and A&M team;	0.20
Sep-22-25	N. Levine	Emails regarding hearing; comment on report facts; consider documents; follow up on liens; work on lease issues; emails regarding redbox;	3.70
Sep-22-25	S. Kukulowicz	Telephone attendance with N. Levine and review of internal emails regarding lease litigation and motion to recover leased vehicles; review of Monitor's 35th Report; review of "facts" summary on disputed leases;	1.30
Sep-23-25	E. Curtis	Reviewing correspondence;	0.10

Date	Name	Description	Hours
Sep-23-25	A. Glover	Review correspondence in respect of upcoming sale notices and potential sales;	0.60
Sep-23-25	T. Li	Correspondence with working group in respect of lien search results; review of court orders; review of draft reporting and revise same; attending to security and discharge-related matters;	0.80
Sep-23-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; correspond with client regarding diligence of VIN;	2.00
Sep-23-25	M. Grewal	Correspondence internally concerning fact pattern;	0.20
Sep-23-25	M. Clarkson-Maciel	Litigation advice regarding outstanding lease payments; drafting regarding the same; analysis of litigation documentation and related advice;	6.20
Sep-23-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results; subsequently conducted, obtained and reviewed Alberta PPSA searches against the same VIN number;	0.50
Sep-23-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 5 VINs; obtaining and reviewing search results;	0.50
Sep-23-25	C. Pendrith	Review background documents; discussion with Cassels team; drafting statement of claim;	3.90
Sep-23-25	N. Levine	Emails regarding settlement and leases;	0.20
Sep-23-25	S. Kukulowicz	Review of email regarding MCV trailer settlement; review of revised statement of claim against I-Way et al. and related emails; review of draft factual matrix regarding leases of I-Way et al.;	1.10
Sep-24-25	E. Hyderman	Review correspondence regarding statement of claim;	0.10
Sep-24-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.30
Sep-24-25	T. Li	Review of lien discharge summaries; calls and correspondence with working group in respect of ongoing sales and review of due diligence searches; attending to other security and discharge related matters;	0.60
Sep-24-25	J. Noel	Review draft PPSA discharge.	0.20
Sep-24-25	M. Grewal	Reviewing leases across various entities to create summary list of all attached guarantors;	1.70
Sep-24-25	M. Clarkson-Maciel	Litigation preparation and drafting content for Manager's Second Report; reviewing guarantees regarding potential litigation; conference with C. Pendrith regarding litigation claims;	5.00
Sep-24-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; Instruct clerks to prepare draft discharges; correspond with client in respect of lien discharges;	3.30

Date	Name	Description	Hours
Sep-24-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Sep-24-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Manitoba and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Sep-24-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Sep-24-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Sep-24-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Alberta PPSA VIN due diligence search request matters in respect of 3 VINs; conducting, obtaining and reviewing initial search results;	0.40
Sep-24-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Sep-24-25	T. Konechny	Attend to filing non-RBC Saskatchewan PPSA discharge in respect of sale 230;	0.10
Sep-24-25	C. Pendrith	Drafting statement of claim; discussions with Cassels team; review additional documents;	2.20
Sep-24-25	N. Levine	Work on lease issues; calls with other creditors and client; brief review of materials; address lien issues,	1.20
Sep-24-25	S. Kukulowicz	Review of revised statement of claim and related emails; review of correspondence from counsel for I-Way regarding repossessed truck; review of revised summary of facts regarding leased trucks;	1.10
Sep-25-25	E. Curtis	Reviewing draft discharges for active sale notices;	0.10
Sep-25-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to prepare and file draft discharges; correspond with client in respect of lien discharges; discussion with internal working group regarding diligence of VIN;	3.60
Sep-25-25	T. Li	Review of lien discharge summaries; calls and correspondence with working group in respect of ongoing sales and review of due diligence searches; attending to other security and discharge related matters;	1.60
Sep-25-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.60
Sep-25-25	J. Noel	Discussions with Cassels team regarding lien releases;	0.50

Date	Name	Description	Hours
Sep-25-25	H. Dylewski	Preparing draft PPSA discharge financing statement relating to non-syndicate liens pertaining Sale 231;	0.20
Sep-25-25	M. Clarkson-Maciel	Conference regarding litigation strategy on recovery of outstanding amounts owing under leases; drafting correspondence in response to lessee counsel; reviewing of documentation prepared by articling student; drafting notice of motion for order approving Manager's fees and activities; Manager report;	4.70
Sep-25-25	A. Slota	Attending to ongoing Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.20
Sep-25-25	A. Slota	Attending to ongoing Ontario, Manitoba and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Sep-25-25	A. Slota	Attending to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Sep-25-25	A. Slota	Attending to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Sep-25-25	A. Slota	Attending to ongoing Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	0.30
Sep-25-25	A. Slota	Attending to ongoing Ontario and Alberta PPSA VIN due diligence search request matters in respect of 3 VINs; obtaining and reviewing balance of all search results;	0.40
Sep-25-25	J. Fleisher	Call with Carla and Timon	0.40
Sep-25-25	T. Konechny	Attend to drafting non-RBC Alberta PPSA discharge in respect of sale 225;	0.10
Sep-25-25	T. Konechny	Attend to drafting non-RBC Ontario and BC PPSA discharges in respect of sale 224;	0.20
Sep-25-25	C. Pendrith	Communications with VK law; Edits to statement of claim; communications with Cassels team;	1.20
Sep-25-25	C. Potter	Matters regarding discharges and related items; calls regarding the same;	0.60
Sep-25-25	J. Trinh	Revising draft PPSA financing statement in respect of Sale 045 and preparing additional partial discharge PPSA financing statement;	0.20
Sep-25-25	N. Levine	Review materials for hearing; call regarding conflicts; call client; review claim; call regarding same; revise claim; review emails; comment on letter; review materials;	2.50
Sep-25-25	S. Kukulowicz	Teams conference regarding claim against I-Way et al; review of further revisions to claim; review of draft letter to VK Law and related emails;	1.60
Sep-26-25	T. Konechny	Attend to filing non-RBC Ontario and BC PPSA discharges in respect of sale 224;	0.20
Sep-26-25	E. Curtis	Reviewing correspondence and updating tracking;	0.20

Date	Name	Description	Hours
Sep-26-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to prepare and file draft discharges; correspond with client in respect of lien discharges;	3.40
Sep-26-25	T. Li	Review of lien discharge summaries; calls and correspondence with working group in respect of ongoing sales and review of due diligence searches; attending to other security and discharge related matters;	0.90
Sep-26-25	K. Seo	Attending to administrative matters; updating sale trackers;	0.70
Sep-26-25	J. Noel	Discussions with Cassels team regarding lien discharge process; review draft PPSA discharges.	1.00
Sep-26-25	E. Martin	Attended hearing for motion to approve of requested Orders of stay extension, ancillary relief, claims review and adjudication process; drafted notes of said hearing for end-point circulation to client.	3.40
Sep-26-25	M. Clarkson-Maciel	Reviewing and providing comment to Manager's Second Report; drafting notice of motion of the Manager and related court materials;	2.40
Sep-26-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 245; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	0.60
Sep-26-25	H. Dylewski	Attending to the registration of PPSA financing change statement relating to non-syndicate liens pertaining Sale 231; receiving confirmation and verification statement of same; correspondence with working group with respect to same;	0.40
Sep-26-25	H. Dylewski	Preparing draft ON PPSA financing change statement relating to non-syndicate liens pertaining Sale 240;	0.20
Sep-26-25	T. Leung	Reviewing documents sent by S. Rothery, including working memo, emails, the omnibus direction, and order, to gain sufficient understanding of the file background;	0.70
Sep-26-25	A. Slota	Receiving and reviewing instructions; attending to Ontario and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.20
Sep-26-25	A. Slota	Receiving and reviewing instructions; attending to Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; conducting searches;	0.20
Sep-26-25	A. Slota	Receiving and reviewing instructions; attending to British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing search results;	0.20
Sep-26-25	A. Slota	Receiving and reviewing instructions; attending to Alberta PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing search results;	0.20

Date	Name	Description	Hours
Sep-26-25	T. Konechny	Attend to filing non-RBC Alberta PPSA discharge in respect of sale 225;	0.10
Sep-26-25	T. Konechny	Attend to drafting and filing BC, Alberta, Manitoba, and Saskatchewan PPSA partial discharges in respect of sale 245;	0.40
Sep-26-25	T. Konechny	Attend to filing non-RBC Ontario PPSA discharges in respect of sale 045;	0.20
Sep-26-25	T. Konechny	Attend to drafting non-RBC British Columbia PPSA discharge in respect of sale 241;	0.10
Sep-26-25	C. Pendrith	Edits to communication to VK Law; discussions concerning same;	0.50
Sep-26-25	N. Levine	Prepare for hearing; review letter and comment on same; communicate with client; comment on report;	1.60
Sep-26-25	S. Kukulowicz	Review of emails regarding correspondence to VK Law; review of draft Second Report;	1.10
Sep-27-25	M. Grewal	Reviewing Notice of Motion regarding related to the repossession of vehicles held by 2834021 Ontario Inc., I-Way Transport Inc., I-Way Logistics Inc., Wings Freightway Inc., and Balwant Singh Samra;	2.20
Sep-27-25	M. Clarkson-Maciel	Comments on Managers Report;	0.70
Sep-27-25	N. Levine	Review factum;	0.20
Sep-28-25	M. Clarkson-Maciel	Reviewing articling student drafting related to motion materials, drafting on the same;	0.40
Sep-29-25	E. Curtis	Reviewing correspondence; file maintenance;	0.30
Sep-29-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to prepare and file draft discharges; instruct B. Bottan and T. Leung regarding PPSA search review procedure;	2.30
Sep-29-25	M. Clarkson-Maciel	Drafting motion materials; comments to Manager's Second Report;	5.10
Sep-29-25	B. Bottan	Correspondence with team regarding PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to prepare draft discharges;	1.10
Sep-29-25	T. Leung	Attending onboarding meeting with S. Rothery; attending to PPSA matters; updating internal status tracking sheet of Pride vehicle sales and discharges; reviewing PPSA searches and draft lien discharges; instructing clerks to prepare draft discharges;	3.30
Sep-29-25	A. Slota	Receiving and reviewing instructions; attending to British Columbia PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing search results;	0.20
Sep-29-25	A. Slota	Attending to ongoing Ontario PPSA VIN due diligence search request matters in respect of 1 VIN; obtaining and reviewing search results;	0.20
Sep-29-25	A. Slota	Attending to ongoing Ontario and Saskatchewan PPSA VIN	0.20

Date	Name	Description	Hours
		due diligence search request matters in respect of 1 VIN; obtaining and reviewing balance of all search results;	
Sep-29-25	T. Konechny	Attend to drafting non-RBC Ontario PPSA discharge in respect of sale 215;	0.10
Sep-29-25	N. Levine	Review additional materials; work on claim and NOM; call regarding changes to documents; revise report;	2.70
Sep-30-25	A. Glover	Review searches in respect of sale 143 and summarize results of same; Request draft discharges for sale 143; correspondence flagging writ of enforcement lien to client;	1.70
Sep-30-25	E. Hyderman	Review and comment on draft Manager's Report; correspondence with M. Clarkson-Maciel regarding same; review RBC motion record;	1.90
Sep-30-25	T. Li	Review of lien discharge draft and discussion with working group in respect of seizure lien and liens in respect of factoring arrangements; review of order in light of same;	0.90
Sep-30-25	K. Seo	Attending to administrative matters; updating sale trackers;	1.40
Sep-30-25	J. Noel	Discussion with Cassels team regarding lien releases; review draft PPSA discharges;	1.60
Sep-30-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 255;	0.20
Sep-30-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 247; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	1.10
Sep-30-25	H. Dylewski	Preparing draft AB PPSA financing change statement relating to non-syndicate liens pertaining Sale 237;	0.20
Sep-30-25	H. Dylewski	Attending to the registration of PPSA financing change statement relating to non-syndicate liens pertaining Sale 240; receiving confirmation and verification statement of same; correspondence with working group with respect to same;	0.40
Sep-30-25	H. Dylewski	Preparing draft PPSA discharge financing statements relating to RBC syndicate liens pertaining Sale 249; attending to the registration of financing statements; receiving confirmations/verification statements of same; providing report of same;	1.10
Sep-30-25	M. Clarkson-Maciel	Drafting Manager's report; drafting material for litigation against TPine lessees; related workstreams;	2.90
Sep-30-25	B. Bottan	Reviewing executed PPSA waivers; update internal tracking sheet regarding PPSA waiver status; correspondence with secured parties regarding draft and executed PPSA waivers;	3.40
Sep-30-25	S. Rothery	Attend to PPSA matters; update internal status tracking sheet of Pride vehicle sales and discharges; review PPSA searches and draft lien discharges; instruct clerks to prepare and file draft discharges; correspond with client regarding lien discharges; discussion with N. Levine regarding factoring registrations;	5.50

Date	Name	Description	Hours
Sep-30-25	T. Leung	Attending to PPSA matters; updating internal status tracking sheet of Pride vehicle sales and discharges; reviewing PPSA searches and draft lien discharges; instructing clerks to prepare draft discharges;	4.10
Sep-30-25	J. Trinh	Attending to registration of non-RBC syndicate lien pertaining to Sale 241; receiving and reviewing verification of same;	0.20
Sep-30-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Saskatchewan PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Sep-30-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Saskatchewan and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Sep-30-25	A. Slota	Receiving and reviewing instructions; attending to Ontario, Alberta and Manitoba PPSA VIN due diligence search request matters in respect of 1 VIN; conducting, obtaining and reviewing initial search results;	0.30
Sep-30-25	C. Pendrith	Receipt of communication from VK Law; consider response;	0.30
Sep-30-25	N. Levine	Work on report; address report issues; work on lien issues; call with client; address factoring liens;	1.90
Sep-30-25	J. Trinh	Attending to MTO VIN search relating to Sale 244 and providing report with respect to same;	0.30
Sep-30-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 253;	0.20
Sep-30-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 252;	0.20
Sep-30-25	J. Trinh	Attending to PPSA VIN searches in respect of Sale 251;	0.20
Sep-30-25	C. Potter	Matters regarding PPSA discharge matters and correspondence regarding the same;	0.30
Sep-30-25	S. Kukulowicz	Review of draft Second Report; review of email from I-Way and related emails with A&M;	1.80

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Fleisher, Jonathan	Partner	0.40	1,190.00	476.00
Oliver, Jeffrey	Partner	1.20	1,000.00	1,200.00
Pendrith, Colin	Partner	9.80	950.00	9,310.00
Levine, Natalie	Partner	27.70	1,025.00	28,392.50
Potter, Carla	Partner	2.00	840.00	1,680.00
Kukulowicz, Shayne	Partner	15.20	1,650.00	25,080.00
Glover, Anna	Associate	5.30	500.00	2,650.00
Curtis, Erin	Associate	3.40	500.00	1,700.00
Seo, Kevin	Associate	15.70	500.00	7,850.00

Name	Title	Hours	Rate	Amount
Rothery, Shae	Associate	39.60	500.00	19,800.00
Hyderman, Eva	Associate	11.60	500.00	5,800.00
Li, Timon	Associate	31.30	550.00	17,215.00
Noel, J'Davia	Associate	5.20	525.00	2,730.00
Clarkson-Maciel, Matteo	Associate	60.00	700.00	42,000.00
Bottan, Brittany	Associate	4.50	500.00	2,250.00
Leung, Tiffany	Associate	8.10	500.00	4,050.00
Konechny, Tiffany	Law Clerk / Paralegal	7.80	465.00	3,627.00
Trinh, Julia	Law Clerk / Paralegal	5.10	515.00	2,626.50
Dylewski, Hannah	Law Clerk / Paralegal	15.20	415.00	6,308.00
Im, Anita	Law Clerk / Paralegal	1.10	415.00	456.50
Slota, Alex	Law Clerk / Paralegal	13.80	465.00	6,417.00
Grewal, Manbir	Law Student	10.30	295.00	3,038.50
Martin, Ethan	Law Student	3.40	295.00	1,003.00
TOTAL (CAD)		297.70		195,660.00

Our Fees	195,660.00	
Less Discount	(19,566.00)	
Total Fees	176,094.00	
HST @ 13.00%	22,892.22	
TOTAL FEES & TAXES (CAD)		198,986.22

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

Electronic Due Diligence	517.50
PPSA - Registration/Applic./Discharges	1,546.55
BC Online - PPSA Search/Registrations	184.00
Driver's License Searches	378.00
Corporate Filings	228.00
Total Non-Taxable Disbursements	2,854.05

Taxable Disbursements

PPSA - Registration/Applic./Discharges	6,227.20
Electronic Due Diligence	1,030.50
Agency Fees and Disbursements	505.80
Total Taxable Disbursements	7,763.50
HST @ 13.00%	1,009.26

Cassels Brock & Blackwell LLP
Alvarez
Re: Court-appointment as Manager of certain assets of the Pride
Group

Page 22 of 22
Invoice No: 2299396
Matter No. 059366-00005

Total Taxable Disbursements & Taxes	<hr/> 8,772.76
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TOTAL DISBURSEMENTS & TAXES (CAD)	11,626.81
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TOTAL FEES	176,094.00
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TOTAL DISBURSEMENTS	10,617.55
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TOTAL TAXES	23,901.48
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TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	210,613.03
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This is Exhibit "B" referred to in the affidavit of Colin D. Pendrith, affirmed before me by videoconference on November 10, 2025, in accordance with O. Reg. 431/20. The affiant was located in the City of Toronto in the Province of Ontario and I was located in the City of Toronto in the Province of Ontario



.....
A Commissioner for Taking Affidavits

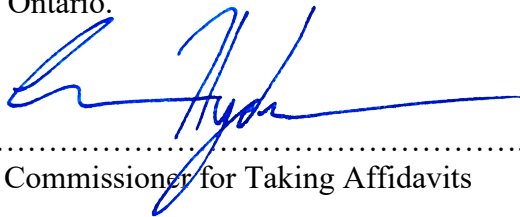
Commissioner Name: Eva-Louise A.A.
Hyderman
Law Society of Ontario Number: 90084W

EXHIBIT “B”
Calculation of Average Hourly Billing Rates of
Cassels Brock & Blackwell LLP
for the period from August 2, 2024, to September 30, 2025

Invoice No./ Period	Fees (\$)	Disbursements (\$)	HST (\$)	Total Fees, Disbursements and HST (\$)	Hours Billed	Average Billed Rate (\$)
2258959 August 1, 2024 to September 30, 2024	71,502.00	178.79	9,318.50	80,999.29	78.40	912.02
2260158 October 1, 2024 to October 31, 2024	327,959.50	3,809.81	43,011.87	374,781.18	447.90	732.22
2263273 November 1, 2024 to November 30, 2024	290,296.50	11,163.13	39,017.90	340,477.53	371.50	781.42
2268594 December 1, 2024 to December 31, 2024	152,937.50	11,499.00	20,724.61	185,161.11	249.40	613.22
2269945 January 1, 2025 to January 31, 2025	173,475.00	8,397.54	23,424.76	205,297.30	233.80	741.98
2276198 February 1, 2025 to February 28, 2025	197,065.35	18,693.03	27,423.52	243,181.90	357.10	551.85

Invoice No./ Period	Fees (\$)	Disbursements (\$)	HST (\$)	Total Fees, Disbursements and HST (\$)	Hours Billed	Average Billed Rate (\$)
2282532 March 1, 2025 to March 31, 2025	178,156.35	34,214.50	26,354.53	238,725.38	369.30	482.42
2282592 April 1, 2025 to April 30, 2025	176,469.75	43,362.33	27,542.63	247,374.71	378.80	465.87
2286742 May 1, 2025 to May 31, 2025	133,645.00	30,662.70	20,361.58	184,669.28	244.60	546.38
2290147 June 1, 2025 to June 30, 2025	113,808.60	27,041.45	17,364.27	158,214.32	236.60	481.02
2294362 July 1, 2025 to July 31, 2025	107,864.10	17,297.45	15,744.91	140,906.46	205.30	525.40
2297659 August 1, 2025 to August 31, 2025	96,747.30	14,191.10	13,982.80	124,921.20	168.80	573.15
2299396 September 1, 2025, to September 30, 2025	176,094.00	10,617.55	23,901.48	210,613.03	297.70	591.51
Total	2,196,020.95	231,128.38	308,173.36	2,735,322.69	3,639.2	603.43

This is Exhibit "C" referred to in the affidavit of Colin D. Pendrith, affirmed before me by videoconference on November 10, 2025, in accordance with O. Reg. 431/20. The affiant was located in the City of Toronto in the Province of Ontario and I was located in the City of Toronto in the Province of Ontario.



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A Commissioner for Taking Affidavits

Commissioner Name: Eva-Louise A.A.
Hyderman
Law Society of Ontario Number: 90084W

EXHIBIT “C”

Billing Rates of Cassels Brock & Blackwell LLP

For the period from August 2, 2024, to September 30, 2025

Year of Call	Individual	Average Rate (\$)	Fees Billed¹ (\$)	Hours Worked
1989	Jonathan Fleisher	1141.18	38,572.00	33.80
1990	Shayne Kukulowicz	1617.50	264,300.00	163.40
1998 (BC) / 2006 (AB)	Sunil Joneja	815.00	2,852.50	3.50
2001 (NY) / 2004 (ON)	Nicola Geary	933.85	23,159.50	24.80
2002 (BC) / 2011 (AB)	Jeffrey Oliver	1000.00	2,300.00	2.30
2004	Jane Dietrich	1005.00	4,924.50	4.90
2008 (NY) / 2013 (ON)	Natalie Levine	1011.89	399,192.50	394.50
2009	Bobby B. Solhi	957.38	11,680.00	12.20
2011	Colin Pendrith	950.00	13,300.00	14.00
2013	Tera Li Parizeau	831.58	3,160.00	3.80
2013	Carla Potter	810.79	46,458.00	57.30
2016	Braek Urquhart	717.58	8,611.00	12.00

¹ Fees Billed amounts do not reflect discounts applied to any of the Invoices.

Year of Call	Individual	Average Rate (\$)	Fees Billed¹ (\$)	Hours Worked
2021 (UK) / 2025 (ON)	Matteo Clarkson-Maciel	699.36	307,090.00	439.10
2022	Joshua Jackson	625.00	15,625.00	25.00
2022	Danielle Karlin	550.00	1,265.00	2.30
2022	Timon Li	521.01	225,232.00	432.30
2023	J'Davia Noel	497.20	100,732.50	202.60
2024	Kevin Seo	500.00	80,100.00	160.20
2024	Erin Curtis	500.00	96,700.00	193.40
2024	Shae Rothery	485.13	213,165.00	439.40
2024	Anna Glover	500.00	46,600.00	93.20
2024	Eva Hyderman	483.06	47,775.00	98.90
2025	Brittany Bottan	500.00	2,250.00	4.50
2025	Tiffany Leung	500.00	4,050.00	8.10
	Julia Trinh (Law Clerk/Paralegal)	502.08	5,0158	99.90
	Tiffany Konechny (Law Clerk/Paralegal)	445.37	61,460.5	138.00
	Alex Sota (Law Clerk/Paralegal)	450.39	13,6738.5	303.60

Year of Call	Individual	Average Rate (\$)	Fees Billed¹ (\$)	Hours Worked
	Fatima Ebadi (Law Clerk/Paralegal)	413.26	2,727.5	6.60
	Krystina Norman (Law Clerk/Paralegal)	360.00	1,872	5.20
	Anita Im (Law Clerk/Paralegal)	376.62	6,176.5	16.40
	Hannah Dylewski (Law Clerk/Paralegal)	398.26	84,432.00	212.00
	Danielle Porter (Law Clerk/Paralegal)	350.71	982.00	2.80
	Edona Fetahu (Law Clerk/Paralegal)	345.00	69.00	0.20
	Pasha Mabanza (Law Student)	295.00	4,513.50	15.30
	Manbir Grewal (Law Student)	295.00	3,038.50	10.30
	Ethan Martin (Law Student)	295.00	1,003.00	3.40

SCHEDULE “A”

A. APPLICANTS

Operating Entities

Canadian Operating Entities

- PRIDE TRUCK SALES LTD.
- TPINE TRUCK RENTAL INC.
- PRIDE GROUP LOGISTICS LTD.
- PRIDE GROUP LOGISTICS INTERNATIONAL LTD.
- TPINE LEASING CAPITAL CORPORATION
- DIXIE TRUCK PARTS INC.
- PRIDE FLEET SOLUTIONS INC.
- TPINE FINANCIAL SERVICES INC.
- PRIDE GROUP EV SALES LTD.

U.S. Operating Entities

- TPINE RENTAL USA, INC.
- PRIDE GROUP LOGISTICS USA, CO.
- ARNOLD TRANSPORTATION SERVICES, INC.
- DIXIE TRUCK PARTS INC.
- TPINE FINANCIAL SERVICES CORP.
- PARKER TRANSPORT CO.
- PRIDE FLEET SOLUTIONS USA INC.

Real Estate Holding Companies

Canadian Real Estate Holding Companies

- 2029909 ONTARIO INC.
- 2076401 ONTARIO INC.
- 1450 MEYERSIDE HOLDING INC.
- 933 HELENA HOLDINGS INC.
- 30530 MATSQUI ABBOTSFORD HOLDING INC.
- 2863283 ONTARIO INC.
- 2837229 ONTARIO INC.
- 2108184 ALBERTA LTD.
- 12944154 CANADA INC.
- 13184633 CANADA INC.
- 13761983 CANADA INC.
- 102098416 SASKATCHEWAN LTD.
- 177A STREET SURREY HOLDING INC.
- 52 STREET EDMONTON HOLDING INC.
- 84 ST SE CALGARY HOLDINGS INC.

- 68TH STREET SASKATOON HOLDING INC.
- 3000 PITFIELD HOLDING INC.
- BLOCK 6 HOLDING INC.

U.S. Real Estate Holding Companies

- PGED HOLDING, CORP.
- HIGH PRAIRIE TEXAS HOLDING CORP.
- 131 INDUSTRIAL BLVD HOLDING CORP.
- 59TH AVE PHOENIX HOLDING CORP.
- DI MILLER DRIVE BAKERSFIELD HOLDING CORP.
- FRONTAGE ROAD HOLDING CORP.
- ALEXIS INVESTMENTS, LLC
- TERNES DRIVE HOLDING CORP.
- VALLEY BOULEVARD FONTANA HOLDING CORP.
- HIGHWAY 46 MCFARLAND HOLDING CORP.
- TERMINAL ROAD HOLDING, CORP.
- BISHOP ROAD HOLDING CORP.
- OLD NATIONAL HIGHWAY HOLDING CORP.
- 11670 INTERSTATE HOLDING, CORP.
- 401 SOUTH MERIDIAN OKC HOLDING CORP.
- 8201 HWY 66 TULSA HOLDING CORP.
- EASTGATE MISSOURI HOLDING CORP.
- FRENCH CAMP HOLDING CORP.
- 87TH AVENUE MEDLEY FL HOLDING CORP.
- LOOP 820 FORT WORTH HOLDING CORP.
- 162 ROUTE ROAD TROY HOLDING CORP.
- CRESCENTVILLE ROAD CINCINNATI HOLDING CORP.
- MANHEIM ROAD HOLDING CORP.
- 13TH STREET POMPANO BEACH FL HOLDING CORP.
- EAST BRUNDAGE LANE BAKERSFIELD HOLDING CORP.
- CORRINGTON MISSOURI HOLDING CORP.
- 963 SWEETWATER HOLDING CORP.
- OAKMONT DRIVE IN HOLDING CORP.

Other Holding Companies

Other Canadian Holding Companies

- 2692293 ONTARIO LTD.
- 2043002 ONTARIO INC.
- PRIDE GROUP HOLDINGS INC.
- 2554193 ONTARIO INC.
- 2554194 ONTARIO INC.
- PRIDE GROUP REAL ESTATE HOLDINGS INC.

- 1000089137 ONTARIO INC.

Other U.S. Holding Companies

- COASTLINE HOLDINGS, CORP.
- PARKER GLOBAL ENTERPRISES, INC.
- DVP HOLDINGS, CORP.

B. LIMITED PARTNERSHIPS

U.S. Limited Partnerships

- PRIDE TRUCK SALES L.P.
- TPINE LEASING CAPITAL L.P.
- SWEET HOME HOSPITALITY L.P.

C.ADDITIONAL STAY PARTIES

Canadian Additional Stay Parties

- 2500819 ONTARIO INC.

U.S. and Other Additional Stay Parties

- PERGOLA HOLDINGS, CORP.

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED AND IN THE MATTER
OF A PLAN OF COMPROMISE OR ARRANGEMENT OF PRIDE GROUP HOLDINGS INC. et al.

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT TORONTO

**AFFIDAVIT OF COLIN D. PENDRITH
SWORN NOVEMBER 10, 2025**

CASSELS BROCK & BLACKWELL LLP

Suite 3200, Bay Adelaide Centre – North Tower
40 Temperance Street
Toronto, ON M5H 0B4

R. Shayne Kukulowicz LSO#: 30729S

Tel: 416.860.6463
skukulowicz@cassels.com

Natalie E. Levine LSO#: 64908K

Tel: 416.860.6568
nlevine@cassels.com

Eva-Lousie A. A. Hyderman LSO#: 90084W

Tel: 416.860.2920
ehyderman@cassels.com

Lawyers for the Manager

APPENDIX “E”

I-Way Lease Summary as at October 31, 2025

VIN	Lease Number	Lessee	Arrears Incl. Tax	Remaining Payable Excl. Tax	Total Payable to End of Lease	Guarantors
Wings Freightway Inc.						
3HSDZAPR2PN757993	40612	WINGS FREIGHTWAY INC.	\$9,167	\$91,940	\$101,106	None
3HSDZAPR4PN303423	40612	WINGS FREIGHTWAY INC.	\$9,166	\$91,936	\$101,102	None
3HSDZAPR9RN599204	42076	WINGS FREIGHTWAY INC.	\$9,040	\$168,005	\$177,045	2834021 Ontario Inc., I-Way Logistics Inc., I-Way Transport Inc.
3HSDZAPRXRN637961	42076	WINGS FREIGHTWAY INC.	\$9,040	\$168,005	\$177,045	2834021 Ontario Inc., I-Way Logistics Inc., I-Way Transport Inc.
1XPBD49X2RD873497	42097	WINGS FREIGHTWAY INC.	\$33,028	\$147,040	\$180,068	Balwant Singh Samra, 2834021 Ontario Inc., I-Way Logistics Inc., I-Way Transport Inc.
1XPBD49X8RD873505	42097	WINGS FREIGHTWAY INC.	\$33,028	\$147,040	\$180,068	Balwant Singh Samra, 2834021 Ontario Inc., I-Way Logistics Inc., I-Way Transport Inc.
1XPBDP9X8PD854340	42097	WINGS FREIGHTWAY INC.	\$47,707	\$143,545	\$191,252	Balwant Singh Samra, 2834021 Ontario Inc., I-Way Logistics Inc., I-Way Transport Inc.
			\$150,175	\$957,511	\$1,107,686	
2834021 Ontario Inc.						
1XPBD49X6PD873533	42051	2834021 ONTARIO INC.	\$35,544	\$143,305	\$178,849	Wings Freightway Inc., I-Way Logistics Inc., I-Way Transport Inc.
3HSDZAPR1RN599200	42074	2834021 ONTARIO INC.	\$45,200	\$164,010	\$209,210	Balwant Singh Samra, I-Way Logistics Inc., I-Way Transport Inc., Wings Freightway Inc.
1UYYS2538N7614311	32719	2834021 ONTARIO INC.	\$8,930	\$20,550	\$29,480	Balwant Singh Samra, I-Way Transport Inc.
1UYYS253XN7614312	32719	2834021 ONTARIO INC.	\$8,930	\$20,550	\$29,480	Balwant Singh Samra, I-Way Transport Inc.
1UYVS2531N7614313	32719	2834021 ONTARIO INC.	\$8,930	\$20,550	\$29,480	Balwant Singh Samra, I-Way Transport Inc.
1UYYS2533N7614314	32719	2834021 ONTARIO INC.	\$8,930	\$20,550	\$29,480	Balwant Singh Samra, I-Way Transport Inc.
1UYYS2537N7614316	32719	2834021 ONTARIO INC.	\$8,930	\$20,549	\$29,479	Balwant Singh Samra, I-Way Transport Inc.
3HSDZAPR6RN780129	40497	2834021 ONTARIO INC.	\$43,515	\$173,293	\$216,808	Wings Freightway Inc., I-Way Logistics Inc., I-Way Transport Inc.
3HSDZAPR2RN780130	40497	2834021 ONTARIO INC.	\$43,421	\$172,920	\$216,341	Wings Freightway Inc., I-Way Logistics Inc., I-Way Transport Inc.
3HSDZAPR4RN780131	40520	2834021 ONTARIO INC.	\$43,422	\$172,924	\$216,346	Wings Freightway Inc., I-Way Logistics Inc., I-Way Transport Inc.
3HSDZAPR6RN780132	40520	2834021 ONTARIO INC.	\$43,421	\$172,920	\$216,341	Wings Freightway Inc., I-Way Logistics Inc., I-Way Transport Inc.
3HSDZAPR8RN780133	40521	2834021 ONTARIO INC.	\$43,422	\$172,924	\$216,346	Wings Freightway Inc., I-Way Logistics Inc., I-Way Transport Inc.
3HSDZAPRXRN780134	40521	2834021 ONTARIO INC.	\$43,421	\$172,920	\$216,341	Wings Freightway Inc., I-Way Logistics Inc., I-Way Transport Inc.
3HSDZAPR3RN780136	40522	2834021 ONTARIO INC.	\$43,422	\$172,924	\$216,346	Wings Freightway Inc., I-Way Logistics Inc., I-Way Transport Inc.
3HSDZAPR7RN780138	40522	2834021 ONTARIO INC.	\$43,421	\$172,920	\$216,341	Wings Freightway Inc., I-Way Logistics Inc., I-Way Transport Inc.
3HSDZAPR9RN780125	40523	2834021 ONTARIO INC.	\$43,422	\$172,924	\$216,346	Wings Freightway Inc., I-Way Logistics Inc., I-Way Transport Inc.
3HSDZAPR0RN780126	40523	2834021 ONTARIO INC.	\$43,421	\$172,920	\$216,341	Wings Freightway Inc., I-Way Logistics Inc., I-Way Transport Inc.
2AYNF7AV6P3T10382	41527	2834021 ONTARIO INC.	\$29,122	\$121,131	\$150,252	Balwant Singh Samra, I-Way Logistics Inc., I-Way Transport Inc., Wings Freightway Inc.
2AYNF7AV8P3T10447	41527	2834021 ONTARIO INC.	\$29,122	\$121,131	\$150,252	Balwant Singh Samra, I-Way Logistics Inc., I-Way Transport Inc., Wings Freightway Inc.
3HSDZAPR5RN570816	42073	2834021 ONTARIO INC.	\$45,200	\$164,005	\$209,205	I-Way Logistics Inc., I-Way Transport Inc., Wings Freightway Inc.
3HSDZAPR7RN570798	42073	2834021 ONTARIO INC.	\$45,200	\$164,005	\$209,205	I-Way Logistics Inc., I-Way Transport Inc., Wings Freightway Inc.
1XPBD49X2PD865235	42091	2834021 ONTARIO INC.	\$39,494	\$143,298	\$182,791	Balwant Singh Samra, I-Way Logistics Inc., I-Way Transport Inc., Wings Freightway Inc.
1XPBD49X4PD865236	42091	2834021 ONTARIO INC.	\$39,494	\$143,298	\$182,791	Balwant Singh Samra, I-Way Logistics Inc., I-Way Transport Inc., Wings Freightway Inc.
1XPBD49X5PD865259	42091	2834021 ONTARIO INC.	\$39,494	\$143,298	\$182,791	Balwant Singh Samra, I-Way Logistics Inc., I-Way Transport Inc., Wings Freightway Inc.
1XPBD49X3PD865261	42091	2834021 ONTARIO INC.	\$39,494	\$143,298	\$182,791	Balwant Singh Samra, I-Way Logistics Inc., I-Way Transport Inc., Wings Freightway Inc.
			\$866,319	\$3,283,112	\$4,149,431	
I-Way Transport Inc.						
3HSDZAPR1RN637962	42069	I-WAY TRANSPORT INC.	\$45,200	\$164,010	\$209,210	2834021 Ontario Inc., I-Way Logistics Inc., Wings Freightway Inc.
3HSDZAPR4RN637972	42066	I-WAY TRANSPORT INC.	\$45,200	\$164,005	\$209,205	2834021 Ontario Inc., I-Way Logistics Inc., Wings Freightway Inc.
3HSDZAPR3RN637946	42066	I-WAY TRANSPORT INC.	\$45,200	\$164,005	\$209,205	2834021 Ontario Inc., I-Way Logistics Inc., Wings Freightway Inc.
3HSDZAPR2RN637971	42067	I-WAY TRANSPORT INC.	\$45,200	\$164,005	\$209,205	2834021 Ontario Inc., I-Way Logistics Inc., Wings Freightway Inc.
3HSDZAPRXRN570813	42067	I-WAY TRANSPORT INC.	\$45,200	\$164,005	\$209,205	2834021 Ontario Inc., I-Way Logistics Inc., Wings Freightway Inc.
3HSDZAPR7RN599203	42068	I-WAY TRANSPORT INC.	\$45,200	\$164,005	\$209,205	2834021 Ontario Inc., I-Way Logistics Inc., Wings Freightway Inc.
3HSDZAPRXRN570844	42068	I-WAY TRANSPORT INC.	\$45,200	\$164,005	\$209,205	2834021 Ontario Inc., I-Way Logistics Inc., Wings Freightway Inc.
1XPBD49X8RD639378	42070	I-WAY TRANSPORT INC.	\$35,544	\$143,298	\$178,842	2834021 Ontario Inc., I-Way Logistics Inc., Wings Freightway Inc.
1XPBD49XCRD639401	42070	I-WAY TRANSPORT INC.	\$35,544	\$143,298	\$178,842	2834021 Ontario Inc., I-Way Logistics Inc., Wings Freightway Inc.
1XPBD49X4RD639376	42070	I-WAY TRANSPORT INC.	\$35,544	\$143,298	\$178,842	2834021 Ontario Inc., I-Way Logistics Inc., Wings Freightway Inc.
1XPBD49X6RD639377	42070	I-WAY TRANSPORT INC.	\$35,544	\$143,298	\$178,842	2834021 Ontario Inc., I-Way Logistics Inc., Wings Freightway Inc.
1XPBDP9X7PD873476	42183	I-WAY TRANSPORT INC.	\$31,595	\$143,298	\$174,892	Balwant Singh Samra, 2834021 Ontario Inc., I-Way Logistics Inc., Wings Freightway Inc.
1XPBDP9X9PD873480	42183	I-WAY TRANSPORT INC.	\$31,595	\$143,298	\$174,892	Balwant Singh Samra, 2834021 Ontario Inc., I-Way Logistics Inc., Wings Freightway Inc.
1XPBDP9X4PD873483	42183	I-WAY TRANSPORT INC.	\$35,544	\$143,298	\$178,842	Balwant Singh Samra, 2834021 Ontario Inc., I-Way Logistics Inc., Wings Freightway Inc.
1XPBDP9X6PD873484	42183	I-WAY TRANSPORT INC.	\$35,544	\$143,298	\$178,842	Balwant Singh Samra, 2834021 Ontario Inc., I-Way Logistics Inc., Wings Freightway Inc.
			\$592,855	\$2,294,420	\$2,887,275	
TOTALS			\$1,609,349	\$6,535,043	\$8,144,391	

APPENDIX “F”

I-WAY TRANSPORT SAMPLE LEASE



TPine Leasing Capital Corporation

LEASE AGREEMENT

						Lease Number 42069	
LESSEE	I-WAY TRANSPORT INC.				CONTACT	BALWANT SINGH SAMRA	
CO-LESSEE					TELEPHONE	905-956-2231	
CO-LESSEE					EMAIL		
BILLING ADDRESS	51 WORCESTER RD			CITY AND PROVINCE	ETOBICOKE, ON	POSTAL CODE	M9W 4K2
	ASSET DESCRIPTION	2024 INTERNATIONAL LT 625 GREY BEARING S NO. 3HSDZAPR1RN637962					
	EQUIPMENT LOCATION						
TERM	EXECUTION DATE	ADVANCE PAYMENT	MONTHLY PAYMENT AMOUNT		GST/HST/QST	TOTAL MONTHLY LEASE AMOUNT	END OF TERM OPTIONS
62 Months	11/25/2023	\$0.00 + Applicable Taxes	RENTAL	\$4,000.00	\$520.00	\$4,520.00	\$10.00
			GAP	\$0.00			See Schedule A for more options
			WALK-AWAY	\$0.00			
PRE-AUTHORIZED DEBIT ("PAD")		Lessor is hereby authorized to deduct the monthly recurring Lease Payments set out above, plus any other amounts due under this Lease Agreement, on the first day of each month from the bank account as outlined on the attached sample cheque. LESSEE HEREBY WAIVES THE RIGHT TO RECEIVE PRE NOTIFICATION OF THE ADDITIONAL AMOUNTS TO BE WITHDRAWN HEREUNDER. The terms of this authorization are further supplemented in section 6 hereof. This PAD is for business purposes.					
1st		Authorized Cheque Signer(s) X				Title(s) _____	
PLEASE ATTACH AN UNSIGNED SAMPLE CHEQUE							

TERMS AND CONDITIONS

Lessor hereby leases to Lessee and Lessee leases from Lessor the personal property listed and described herewith ("Equipment") under the terms and conditions set forth herein. Lessee warrants that the Equipment is being leased and will be used for business and commercial purposes only. This Contract ("Lease Agreement") shall not become binding on Lessor until accepted in writing by Lessor as evidenced by the signature of a duly authorized representative of Lessor. Lessee acknowledges that the Total Monthly Lease Amount contains Equipment charges only.

1. NON-CANCELLABLE CONTRACT. This Lease Agreement cannot be terminated during the term set forth ("Term") except as expressly provided herein.
2. LEASE PAYMENTS. Lessee shall pay to Lessor on the first day of each month of the Term the Total Monthly Lease Amount (the "Lease Payments") set forth above commencing on the Lease Commencement Date specified above and continuing for the Term. Lessee will not assert against Lessor any claim by way of abatement, defense, setoff, compensation or counterclaim. The Term shall commence on the first day of the month following equipment delivery and rent shall be pro-rated from the date of equipment delivery until the Term commences.
3. ADVANCE PAYMENTS. The Advance Payments as set forth above, shall be paid to Lessor by Lessee on the Lease Commencement Date specified above and shall be applied to the cost of the Equipment as a down payment. Lessee acknowledges and agrees that the Advance Payment does not constitute equity in the Equipment and further acknowledges that the Lease Payments have been calculated on the basis that the Advance Payments have offset the equipment cost.
4. LOCATION AND USE. The Equipment shall be located and used at the place designated herein identified as the above noted billing address unless notified otherwise and locations as specified in the attached schedule(s), and shall not be moved without the prior written consent of Lessor. Notwithstanding the foregoing, motor vehicles, trailers, or other goods of a type normally used in more than one jurisdiction, need not be kept at a specific location but shall at all times be under Lessee's control and shall not be domiciled outside Canada without prior written consent of the Lessor. Lessee shall at its own cost and expense keep the Equipment in good repair, condition and working order and furnish all parts and servicing required therefore. Lessee shall cause the Equipment to be maintained and operated carefully in compliance with manufacturer's recommendations and applicable laws and regulations present or future, by competent and duly qualified personnel only. Lessor may inspect the Equipment at any time upon reasonable prior notice to Lessee. Any improvements resulting from any accessions, attachments, additions, changes, modifications or other alterations to the Equipment shall immediately form part of the Equipment and become subject to this Lease Agreement. The Equipment shall remain as separately identifiable, personal and moveable property and shall not be affixed to real property, without the Lessor's prior written consent. If the Equipment is to be affixed to any real property, the Lessee acknowledges and agrees that the Lessor may file a notice of security interest against such real property and the Location of the Equipment as set out above shall be the address of such real property.
5. REPRESENTATIONS AND WARRANTIES. Lessee acknowledges that the vendor and/or manufacturer of the Equipment and the Equipment and its specifications have been selected by the Lessee for the purpose of the lease thereof to the Lessee under this Lease Agreement. Lessor makes no representation or warranty, expressed, implied, legal, statutory, customary or otherwise in respect to the Equipment, including but without limitation the merchantability, condition,

design, operation or fitness for purpose of use thereof or its freedom from liens and encumbrances. If the Equipment is not properly installed, does not operate as intended by Lessee or as represented by the manufacturer or vendor, totally fails to function or perform so as to give rise to a fundamental breach or alleged fundamental breach with respect to the Equipment, or is unacceptable for any other reason whatsoever, Lessee shall claim only against such vendor or manufacturer under such warranties made available to Lessee and shall nevertheless unconditionally pay Lessor all Lease Payments and other amounts payable hereunder without abatement, defense or set off. Lessor hereby assigns to Lessee for and during the applicable Term, the warranties, if any and if assignable, of the manufacturer with respect to the Equipment.

6. **PRE-AUTHORIZED PAYMENT PLAN.** It is a condition of this Lease that Lessee make the Lease Payments by PAD. Lessee may revoke its authorization at any time. Written notification must be received by Lessor at least 30 days prior to the next scheduled PAD date. Lessee has certain recourse rights if any PAD does not comply with this Lease Agreement, including the right to reimbursement for any PAD that is not authorized or consistent with this Lease Agreement. To obtain a sample cancellation form, reimbursement claim form or for more information on the right to cancel a PAD agreement and payor recourse rights, Lessee is directed to its financial institution or to www.cdnipay.ca. Lessee agrees that termination of this authorization does not cancel or reduce its obligations under this Agreement. Lessee waives the right to receive prior notice of all other amounts to be debited and the dates on which such debits will be processed, as well as notice of further changes to such amounts or dates. Lessor may assign this authorization to any third party to whom it assigns its interest in this agreement. Any inquiries regarding the PAD can be directed to Lessor at the address noted above. The Lessee acknowledges and agrees that any fines, penalties, tickets, toll charges and the like, which the lessor receives as a result of their title to the Equipment, are for the account of the Lessee and may be debited by PAD from Lessee's account.

7. **RETURN OF EQUIPMENT.** At the end of the term of the Lease Agreement, provided that Lessee does not elect to purchase the Equipment or renew this Lease Agreement, Lessee shall, at its own risk and expense, immediately return the Equipment to Lessor, or its designated agent, in the same condition as when delivered, ordinary wear and tear excepted resulting from normal use thereof alone allowed and without any missing or broken components or accessories, at such locations as Lessor shall designate. If any item of Equipment is damaged or does not meet the standards set forth above for return condition of such Equipment, or if the Lessee fails to discharge Lessee's obligations set forth above with regard to any item of Equipment, Lessee shall pay to Lessor, immediately upon demand, the fair market value applicable to such item of Equipment.

8. **RATE AND TAXES.** Lessee shall comply with all governmental laws, regulations and orders relating to this Lease Agreement, the Equipment and its use and agrees to pay when due all license fees, assessments and all taxes, including but not limited to sales, goods and services, property, excise, and other taxes now or hereafter imposed by any federal, provincial, municipal or other taxing authority upon this Lease Agreement or and Equipment, or the purchase, ownership, delivery, renting, possession, use, operation and return thereof (but excluding income and capital taxes of Lessor). Any fees, taxes or other lawful charges paid by Lessor upon failure of Lessee to make such payments shall at Lessor's option become immediately due from Lessee to Lessor.

9. **EQUIPMENT RISK AND INSURANCE.** The Equipment shall be at the risk of the Lessee. Lessee shall obtain and maintain for the entire Term and any Renewal Period of this Lease Agreement, at its own expense, insurance against liability arising from damage to property of others and bodily injury or personal injury, and insurance against loss or damage to the Equipment in such amounts, in such form, and with such insurers shall be satisfactory to Lessor. Each insurance policy will name Lessor as additional insured and loss payee and all policies shall contain a clause requiring the insurer to give Lessor at least thirty (30) days' prior written notice of any alteration in the terms or cancellation of the policy. Lessee shall furnish a certificate, or other evidence satisfactory to Lessor, on or before the Lease Commencement Date. Lessee irrevocably appoints Lessor as Lessee's attorney-in-fact to request required insurance coverages, make claims, receive payments and execute and endorse all documents, cheques, drafts or other instruments necessary or advisable to secure payments due under any policy contemplated hereby.

10. **LOSS OR DAMAGE.** Lessee shall bear all risk of loss associated with an Equipment, including the theft, destruction, or damage, (including, but not limited to, any condemnation, seizure, or requisition of title or use) ("Event of Loss"). When any Event of Loss occurs, Lessee shall immediately notify Lessor and, at the option of Lessor, shall (a) place such Equipment in good repair and working order; or (b) replace such Equipment with like Equipment (of the same year, make, model and accessories) in good repair and working order, with clear title to the replacement Equipment in Lessor; or (c) pay to the Lessor the Stipulated Loss Value of such Equipment. The "Stipulated Loss Value" for particular Equipment shall be an amount equal to: (i) the value of all the remaining Lease Payments payable to the expiration of the Term, plus (ii) the Lessor's estimated residual value of the Equipment. For greater certainty, if Lessor determines the Event of Loss constitutes a total loss, Lessee shall pay Lessor the Stipulated Loss Value of the Equipment less any insurance proceeds actually received by the Lessor.

11. **ASSIGNMENT.** Lessee shall not sell, assign, sublet, pledge, hypothecate or otherwise encumber or suffer a lien upon or against an interest in this Lease Agreement or the Equipment without the prior written consent of Lessor. In the event of an assignment, Lessee agrees to pay an assignment fee to Lessor of \$100.00 or Lessor's actual costs, whichever is greater. Lessor may assign this Lease Agreement at any time without notice to or consent of the Lessee. Lessee agrees to pay all Lease Payments hereunder unconditionally to any such assignee, without abatement, defense, set off, compensation or counterclaim. If required by assignee, Lessee shall make all Lease Payments directly to assignee and agrees to promptly execute and deliver such acknowledgements, agreements, all necessary documentation necessary to pre-authorize the Lease Payments automatically debited from Lessee's bank account and other instruments from time to time as may be requested by assignee, purchaser or secured party. Lessee agrees that it will not assert against any assignee any claims, defenses, setoffs, compensations, deductions or counterclaims it may now or hereafter be entitled to against Lessor and agrees not to terminate this Agreement due to any default on the part of the Lessor or Supplier whether or not arising hereunder. This assignment, sale and grant of security shall not relieve Lessor of its obligations to Lessee hereunder and Lessee agrees that this assignment shall not be construed as an assumption of such obligations by Assignee.

12. **TITLE.** Lessee shall have no right, title or interest in the Equipment other than, conditional upon Lessee's compliance with and fulfillment of the terms and conditions of this Agreement, the right to maintain possession and use of the Equipment for the full Term and any Renewal Period. Lessor may require plates or markings to be affixed to or placed on the Equipment indicating Lessor is the owner. Lessor and Lessee hereby confirm their intent that the Equipment shall always remain and be deemed moveable property, even though said Equipment may hereinafter become attached or affixed to realty.

13. **DEFAULT.** Lessee is in default under this Lease Agreement if: (i) Lessee fails to pay any Lease Payments or other amounts payable hereunder on the due date; (ii) Lessee fails to perform or observe any covenant, condition or agreement to be performed or observed hereunder; (iii) any representation or warranty made by Lessee herein or in any document or certificate furnished to Lessor in connection herewith or pursuant hereto is incorrect at any time in any material respect; (iv) Lessee becomes insolvent or bankrupt or makes an assignment for the benefit of creditors or consents to the appointment of a trustee or receiver, or a trustee or receiver is appointed for Lessee or for a substantial part of its property without its consent; (v) if Lessee defaults under any other lease, contract or other agreement between Lessee and Lessor; (vi) any item of Equipment is confiscated, forfeited or seized or otherwise attached by anyone pursuant to any legal process or other means, or is used in any illegal activity; or (vii) Lessee shall suffer a material adverse change in its financial condition or operations. If a default occurs, Lessor in its absolute discretion may: (a) enter upon the premises where such Equipment is located and take immediate possession thereof, whether it is affixed to realty or not, and remove the same, without liability to Lessor for or by reason of such entry or taking of possession, and with or without terminating this Lease Agreement, sell, rent, or otherwise dispose of the same for such consideration and upon such terms and conditions as Lessor may reasonably deem fit and receive, hold and apply the same against any monies expressed to be payable from time to time by Lessee hereunder; (b) cancel any licence plate attributed to the Equipment even if such plate is in the Lessee's name; (c) terminate this Lease Agreement; (d) declare the total amount or any portion thereof of unpaid Lease Payments and other amounts due and to become due hereunder for the Term immediately due and payable, and by written notice to Lessee specifying a payment date not earlier than five (5) days from the date of such notice, require Lessee to pay to Lessor on the date specified in such notice, the (i) the value of all the remaining Lease Payments payable to the expiration of the Term, plus (ii) the Lessor's estimated residual value of the Equipment (e) as a late charge, require the payment of interest at the rate of 24% per annum on any overdue payment until paid. No remedy referred to in this section is intended to be exclusive, but each shall be cumulative and in addition to any other remedy referred to above or otherwise available to Lessor at law or in equity. Lessee agrees that Equipment is of a type customarily sold on a recognized market and hereby waives any right to notice of sale under the applicable personal property security legislation. In the event Lessor repossesses and sells, rents or re-leases each item of Equipment, the proceeds of any such sale or agreement shall be applied to reimburse Lessor for Lender's damages. Lessor shall be entitled to any surplus and Lessee shall remain liable for any deficiency.

14. **NOTICES.** Any notices and demands require to be given herein shall be given to the parties in writing and by registered mail at the address herein set forth, or to such other address as the parties may hereafter substitute by written notice given in the manner prescribed in this section. Lessor and Lessee hereby agree that all documents, including this Lease Agreement, sent by facsimile or other means of electronic transmission to the other party shall be considered to be original documents.

15. **FURTHER ASSURANCES.** Lessee will promptly execute and deliver to Lessor such further documents and take such further action as Lessor may request in order to more effectively carry out the intent and purpose hereof. At Lessor's request, Lessee shall send Lessor its audited and/or unaudited financial statements within fourteen (14) days of such request.

16. CHARGES. Lessee shall pay to Lessor a late charge of ten dollars (\$10.00) for each month or part thereof for which Lease Payments or other sum payable hereunder shall be delinquent together with interest on any and all delinquent payments and amounts in default from the date thereof until paid in full at there rate of 24% per annum calculated monthly. Lessee further agrees to pay to Lessor a returned cheque or non-sufficient funds (NSF) charge in an amount equal to \$75.00 for the first occurrence and \$100.00 for any subsequent NSF, plus other amounts allowed by law. Lessee also agrees to pay as additional rent, reasonable administration charges as set out in Lessor's current schedule of charges from time to time. Lessee shall pay any and all charges and costs incurred by the Lessor in connections with the enforcement of its rights under this Lease Agreement, including reasonable legal expenses and expenses incurred in the repossession of the Equipment. Should Lessee fail to perform any obligation hereunder, Lessor may cause such obligation to be performed and the cost thereof together with interest thereon at 24% per annum shall be considered as an additional Lease Payment to be paid by Lessee.

17. CREDIT INVESTIGATION AND PRIVACY WAIVERS. We may receive from and disclose to any person or business entity including without limitation, any of our affiliates or credit reporting agencies, for any purpose, information about your accounts, credit application and credit experience and you authorizes any person or entity to release any information related to your accounts to us. This shall be a continuing authorization for all present and future disclosures of your account information.

18. GENERAL INDEMNITY. Lessee indemnifies and agrees to defend and hold Lessor, its officers, directors and employees, and any successors, assignee or secured party of Lessor, harmless from and against all claims, costs, expenses (including, but not limited to, legal fees), damages and liabilities of any nature whatsoever that may be imposed on, incurred by or asserted against an indemnified party with respect to any item of Equipment or its purchase, acceptance, delivery, ownership, leasing, possession, maintenance, use, operation or transportation, whether or not other parties are involved. The liability of Lessee to make indemnification payments shall, notwithstanding any expiration, cancellation or other termination (whether voluntary, as the result of a default or otherwise) of this Lease Agreement, continue to exist until such Indemnity payments are irrevocably made in full by Lessee and received by Lessor. If any claim is made against Lessee or Lessor, the party receiving notice of such claim shall promptly notify the other, but failure of the party receiving notice to so notify the other shall not relieve Lessee of any obligation hereunder.

19. LANGUAGE. The parties hereto agree that this document be written in the English language. Les parties aux présentes conviennent à ce que ce document soit rédigé en anglais.

20. WAIVER. No covenant or condition of this Lease Agreement can be waived except in writing by Lessor and any forbearance or indulgence by Lessor in any regard whatsoever shall not constitute a waiver of any covenant or conditions to be performed by Lessee to which the same may apply and, until complete performance by Lessee of said covenant or condition, Lessor shall be entitled to invoke any remedy available under this Lease Agreement or by law. No waiver by Lessor of any default shall constitute a waiver of any other default by Lessee or a waiver of Lessor's rights.

21. CO-LESSEES. Lessee and the Co-Lessee, if any, hereby agree that their respective liability for the payment and performance of obligations of the Lessee under this Lease Agreement shall be joint and several. Any reference to Lessee in this Lease Agreement shall be deemed to be a reference to the Co-Lessee, in any.

22. MISCELLANEOUS. This Lease Agreement shall be governed by the laws of the jurisdiction of which the Equipment was originally delivered to the Lessee. Time is of the essence with respect to this Lease Agreement. This Lease Agreement contains the whole of the agreement between the parties and there are no collateral agreements or conditions whatsoever relating to the Equipment or this Lease Agreement not specifically set forth or referred to herein and no modifications, amendments or variations shall be effective or binding unless agreed to in writing and properly executed by the parties. This Lease Agreement shall be binding upon and inure to the benefit of the parties hereto, their permitted successors and assigns. A facsimile copy of this Lease Agreement with facsimile signature(s) will be treated as an original and will be admissible as evidence of this Lease Agreement. Any provision of this Lease Agreement which is unenforceable in any jurisdiction shall, as to such jurisdiction, be ineffective to the extent of such prohibition or unenforceability without invalidating the remaining provisions hereof and any such prohibition or unenforceability in and jurisdiction shall not invalidate or render unenforceable such provisions in any other jurisdiction. The Lessee acknowledges and agrees that (i) clerical errors shall not affect the validity of this Lease Agreement and Lessor shall be entitled to unilaterally correct the same; and (ii) the Lessor shall be entitled and is hereby authorized to complete the equipment description on the face of this Lease Agreement. Lessor may register a financing statement and Lessee waives the receipt of and the right to receive a copy of any such registered statement or verification statement with respect thereto. To the extent not prohibited by law, Lessee hereby waives the benefit of all provisions of any law, statute or regulation which would in any manner affect Lessor's rights and remedies hereunder, including provisions of the limitations of Civil Rights Act of Saskatchewan.

23. Vehicle Full Service Agreement as per Schedule "B".

24. GUARANTEE AND INDEMNITY. The undersigned (hereinafter the "Indemnitor"), hereby irrevocably and unconditionally guarantees the Lessor payment of all Lease Payments and promises to satisfy all other obligations arising hereunder this Lease (the "Obligations"), in the event that the Lessee(s) fails to fulfill any its contractual obligations under this Lease. This is an absolute, unconditional, irrevocable and continuing guarantee and indemnity that will remain in full force and effect until all of the Obligations have been indefeasibly satisfied in full, and Lessor has terminated this Guarantee and Indemnity. This Guarantee and Indemnity will not be affected by any surrender, exchange, acceptance, compromise or release by Lessor of any other party, or any other guarantee or any security held by it for any of the Obligations, by any failure of the Lessor to take any steps to perfect or maintain its lien or security interest in or to preserve its rights to any security or other collateral for any of the Obligations, or by any irregularity, unenforceability or invalidity of any of the Obligations or any part thereof or any security or other guarantee thereof. The Indemnitor also hereby waives the benefit of further discussion and division.

Date: November 25, 2023

FOR OFFICE USE ONLY

EXECUTED AS LESSOR:

TPINE LEASING CAPITAL CORPORATION

By  Authorized Signatory

LESSEE

(Full Legal Name)

I-WAY TRANSPORT INC.

The undersigned affirms that he/she is duly authorized to execute this Lease.

By 

Authorized Signatory

Title

Date

11/25/2023

INDEMNITOR

(Full Legal Name)

By

Authorized Signatory

CO-LESSEE

(Full Legal Name)

By

Authorized Signatory

*** SCHEDULE "A" ***

To Lease Agreement dated November 25, 2023, between TPine Leasing Capital Corporation and I-WAY TRANSPORT INC..

End of Term Options Notwithstanding anything contained in the Lease Agreement to the contrary, so long as no default shall have occurred and be continuing, you shall have the following options at the end of the Initial Term (the "Option Date"):

(a) Purchase all, but not less than all, the Equipment leased pursuant to this Lease Schedule on an "as is, where is" basis, without representation or warranty, express or implied, at a price equal to:

\$10.00

plus any applicable taxes (the "Purchase Price"). After such notice and payment, provided no Default exists, you shall acquire our interest in the Equipment on the Option Date on an "as is, where is" basis without any condition, representation or warranty by us of any kind whatsoever except that you will acquire such interest free and clear of all liens and encumbrances created by or through us; or

["Fair Market Value" shall mean an amount equal to the sales price obtainable in an arms-length transaction between a willing and informed buyer under no compulsion to buy and a willing and informed seller with no compulsion to sell and assuming the Equipment is in the condition required by the Lease.]

(b) Return all but not less than all, the Equipment at your expense to a location in Canada as we designate; or

(c) Continue to lease the Equipment on a month to month basis for the same monthly Lease Payments and on the same terms and conditions of the Lease Agreement.

Should you fail to notify us of your election within ninety (90) days of the end of the Initial Term, you shall be deemed to have elected option (c) above, provided however, you shall have the option to purchase all, but not less than all, of the Equipment at any time upon written notice of ninety (90) days to us for the Purchase Price.

IN WITNESS WHEREOF, the parties hereto have caused this Lease Schedule to be duly executed on the date set forth below by their authorized representatives.

TPINE LEASING CAPITAL CORPORATION

I-WAY TRANSPORT INC.

By: _____
Name: _____
Title: _____

By: 
Name: BALWANT SINGH SAMRA
Title: _____

DELIVERY AND ACCEPTANCE CERTIFICATE

DATED: November 27, 2023

I-WAY TRANSPORT INC.

51 WORCESTER RD

ETOBICOKE, ON M9W 4K2

Hereinafter called <<Lessee>>

Equipment: 2024 INTERNATIONAL LT 625 GREY BEARING S NO. 3HSDZAPR1RN637962

1. The undersigned hereby represents and certifies to Lessor that each item of Equipment specified in the Lease

(A) has been delivered to and inspected by Lessee as of the date hereof;

(B) is satisfactory for financing under the Lease and is unconditionally and irrevocably accepted;

(C) is in good condition and operates properly;

(D) is subject to all of the terms and conditions of the Lease; and

(E) an authorized officer of the undersigned has executed this Acceptance Certificate.

2. This executed Acceptance Certificate constitutes an instruction to Lessor to pay for the Equipment and to commence the Lease and to make all automatic withdrawals provided for in the Lease.

TPINE LEASING CAPITAL CORPORATION

By: _____
Name: _____
Title: _____



I-WAY TRANSPORT INC.

By: 
Name: BALWANT SINGH SAMRA
Title: _____

GUARANTEE (corporate)

Complete in block letters

1. In consideration of the transactions entered by Tpine Leasing Capital Corporation (hereinafter called Tpine Leasing Capital Corporation) an The Lessee **I-WAY TRANSPORT INC.** The undersigned (hereinafter called The Guarantor) hereby guarantees Tpine Leasing Capital Corporation unconditionally, jointly and severally with The Lessee the payment of all debts, amounts or obligations, direct or indirect, now owed or that will become owed to Tpine Leasing Capital Corporation by The Lessee or its successors and ensued from the above-mentioned leasing agreement;
2. In all event of execution of the present guarantee, Tpine Leasing Capital Corporation will not have to assert or exhaust its recourses or guarantees against The Lessee or any other person, and The Guarantor shall not assert any right which Tpine Leasing Capital Corporation may or might have against The Lessee or any other person;
3. The present guarantee shall not be diminished or affected in any way because of:
- a) renewal, modification, extension of delay that might be convened between Tpine Leasing Capital Corporation and The Lessee regarding the terms and conditions of the above mentioned Leasing Agreement;
 - b) remittance, total or partial leave of a guarantee;
 - c) renunciation to defaults of The Lessee or any other person;
 - d) release, modification, adjustment or addition regarding any obligation of The Lessee or any other person;
 - e) attribution of the amounts received by Tpine Leasing Capital Corporation from The Lessee or any other person;
 - f) invalidity or non-execution of any writing or commitment by The Lessee or any other person;
 - g) changes in The Lessee's organizational structure or of its managers.
4. The Guarantor expressly relinquishes the privileges of division and discussion and its liability will be paramount, total and absolute without consideration for the liability of The Lessee, of Tpine Leasing Capital Corporation or any other person;
5. The obligations of The Guarantor under the present Guarantee will bind its heirs, testamentary executors, administrators, legal representatives and successors, and any release to any other guarantor shall not relieve The Guarantor from his commitments in accordance with this Guarantee;
6. The Guarantor shall not be released from his commitments in this Guarantee as long as all amounts owed to Tpine Leasing Capital Corporation by The Lessee in accordance with the above mentioned Leasing Agreement, on any grounds in capital, interest, costs and others, are not be paid in full, and, more specifically, The Guarantor who commits as such within the scope of his functions as an administrator, shareholder or spouse will not be released as a result of the end of said functions. The Guarantor recognizes that Tpine Leasing Capital Corporation would not have committed in favour of The Lessee without this Guarantee;
7. The Guarantor elects residence in the judiciary district of Ontario for any and all legal proceedings and tribunal jurisdiction;
8. This Guarantee may be transferred or transported without notice, and the assignee shall possess all its ensued rights as Tpine Leasing Capital Corporation itself.

IN WITNESS THEREOF,
The Guarantor has signed in

Mississauga on this November 25, 2023

Witness Sign

Witness Name (block letters)

Address

2834021 ONTARIO INC.

Guarantor Name

Guarantor Signature

51 WORCESTER RD, Etobicoke, Ontario M9W 4K2
Address

GUARANTEE (corporate)

Complete in block letters

1. In consideration of the transactions entered by Tpine Leasing Capital Corporation (hereinafter called Tpine Leasing Capital Corporation) an The Lessee **I-WAY TRANSPORT INC.** The undersigned (hereinafter called The Guarantor) hereby guarantees Tpine Leasing Capital Corporation unconditionally, jointly and severally with The Lessee the payment of all debts, amounts or obligations, direct or indirect, now owed or that will become owed to Tpine Leasing Capital Corporation by The Lessee or its successors and ensued from the above-mentioned leasing agreement;
2. In all event of execution of the present guarantee, Tpine Leasing Capital Corporation will not have to assert or exhaust its recourses or guarantees against The Lessee or any other person, and The Guarantor shall not assert any right which Tpine Leasing Capital Corporation may or might have against The Lessee or any other person;
3. The present guarantee shall not be diminished or affected in any way because of:
- a) renewal, modification, extension of delay that might be convened between Tpine Leasing Capital Corporation and The Lessee regarding the terms and conditions of the above mentioned Leasing Agreement;
 - b) remittance, total or partial leave of a guarantee;
 - c) renunciation to defaults of The Lessee or any other person;
 - d) release, modification, adjustment or addition regarding any obligation of The Lessee or any other person;
 - e) attribution of the amounts received by Tpine Leasing Capital Corporation from The Lessee or any other person;
 - f) invalidity or non-execution of any writing or commitment by The Lessee or any other person;
 - g) changes in The Lessee's organizational structure or of its managers.
4. The Guarantor expressly relinquishes the privileges of division and discussion and its liability will be paramount, total and absolute without consideration for the liability of The Lessee, of Tpine Leasing Capital Corporation or any other person;
5. The obligations of The Guarantor under the present Guarantee will bind its heirs, testamentary executors, administrators, legal representatives and successors, and any release to any other guarantor shall not relieve The Guarantor from his commitments in accordance with this Guarantee;
6. The Guarantor shall not be released from his commitments in this Guarantee as long as all amounts owed to Tpine Leasing Capital Corporation by The Lessee in accordance with the above mentioned Leasing Agreement, on any grounds in capital, interest, costs and others, are not be paid in full, and, more specifically, The Guarantor who commits as such within the scope of his functions as an administrator, shareholder or spouse will not be released as a result of the end of said functions. The Guarantor recognizes that Tpine Leasing Capital Corporation would not have committed in favour of The Lessee without this Guarantee;
7. The Guarantor elects residence in the judiciary district of Ontario for any and all legal proceedings and tribunal jurisdiction;
8. This Guarantee may be transferred or transported without notice, and the assignee shall possess all its ensued rights as Tpine Leasing Capital Corporation itself.

IN WITNESS THEREOF,
The Guarantor has signed in

Witness Signature

Witness Name (block letters)

Address

Mississauga on this November 25, 2023

I-WAY LOGISTICS INC

Guarantor Name



Guarantor Signature

2792 Slough Street, Mississauga, ON L4T 1G3
Address

GUARANTEE (corporate)

Complete in block letters

1. In consideration of the transactions entered by Tpine Leasing Capital Corporation (hereinafter called Tpine Leasing Capital Corporation) an The Lessee **I-WAY TRANSPORT INC.** The undersigned (hereinafter called The Guarantor) hereby guarantees Tpine Leasing Capital Corporation unconditionally, jointly and severally with The Lessee the payment of all debts, amounts or obligations, direct or indirect, now owed or that will become owed to Tpine Leasing Capital Corporation by The Lessee or its successors and ensued from the above-mentioned leasing agreement;
2. In all event of execution of the present guarantee, Tpine Leasing Capital Corporation will not have to assert or exhaust its recourses or guarantees against The Lessee or any other person, and The Guarantor shall not assert any right which Tpine Leasing Capital Corporation may or might have against The Lessee or any other person;
3. The present guarantee shall not be diminished or affected in any way because of:
- a) renewal, modification, extension of delay that might be convened between Tpine Leasing Capital Corporation and The Lessee regarding the terms and conditions of the above mentioned Leasing Agreement;
 - b) remittance, total or partial leave of a guarantee;
 - c) renunciation to defaults of The Lessee or any other person;
 - d) release, modification, adjustment or addition regarding any obligation of The Lessee or any other person;
 - e) attribution of the amounts received by Tpine Leasing Capital Corporation from The Lessee or any other person;
 - f) invalidity or non-execution of any writing or commitment by The Lessee or any other person;
 - g) changes in The Lessee's organizational structure or of its managers.
4. The Guarantor expressly relinquishes the privileges of division and discussion and its liability will be paramount, total and absolute without consideration for the liability of The Lessee, of Tpine Leasing Capital Corporation or any other person;
5. The obligations of The Guarantor under the present Guarantee will bind its heirs, testamentary executors, administrators, legal representatives and successors, and any release to any other guarantor shall not relieve The Guarantor from his commitments in accordance with this Guarantee;
6. The Guarantor shall not be released from his commitments in this Guarantee as long as all amounts owed to Tpine Leasing Capital Corporation by The Lessee in accordance with the above mentioned Leasing Agreement, on any grounds in capital, interest, costs and others, are not be paid in full, and, more specifically, The Guarantor who commits as such within the scope of his functions as an administrator, shareholder or spouse will not be released as a result of the end of said functions. The Guarantor recognizes that Tpine Leasing Capital Corporation would not have committed in favour of The Lessee without this Guarantee;
7. The Guarantor elects residence in the judiciary district of Ontario for any and all legal proceedings and tribunal jurisdiction;
8. This Guarantee may be transferred or transported without notice, and the assignee shall possess all its ensued rights as Tpine Leasing Capital Corporation itself.

IN WITNESS THEREOF,
The Guarantor has signed in

Witness Signature

Witness Name (block letters)

Address

Mississauga on this November 25, 2023

WINGS FREIGHTWAY INC.

Guarantor Name



Guarantor Signature

51 WORCESTER RD, Etobicoke, Ontario M9W 4K2
Address

WINGS FREIGHTWAY SAMPLE LEASE`



TPine Leasing Capital Corporation

LEASE AGREEMENT

						Lease Number 42097	
LESSEE	WINGS FREIGHTWAY INC.				CONTACT	Balwant Singh Samra	
CO-LESSEE					TELEPHONE	905-956-2231	
CO-LESSEE					EMAIL		
BILLING ADDRESS	51 Worcester Rd			CITY AND PROVINCE	Etobicoke, ON		POSTAL CODE M9W 4K2
	ASSET DESCRIPTION	Refer Equipment Schedule					
	EQUIPMENT LOCATION						
TERM	EXECUTION DATE	ADVANCE PAYMENT	MONTHLY PAYMENT AMOUNT		GST/HST/QST	TOTAL MONTHLY LEASE AMOUNT	END OF TERM OPTIONS
62 Months	11/28/2023	\$0.00 + Applicable Taxes	RENTAL	\$13,980.00	\$1,817.40	\$15,797.40	\$10.00
			GAP	\$0.00			See Schedule A for more options
			WALK-AWAY	\$0.00			
PRE-AUTHORIZED DEBIT ("PAD")		Lessor is hereby authorized to deduct the monthly recurring Lease Payments set out above, plus any other amounts due under this Lease Agreement, on the first day of each month from the bank account as outlined on the attached sample cheque. LESSEE HEREBY WAIVES THE RIGHT TO RECEIVE PRE NOTIFICATION OF THE ADDITIONAL AMOUNTS TO BE WITHDRAWN HEREUNDER. The terms of this authorization are further supplemented in section 6 hereof. This PAD is for business purposes.					
1st		Authorized Cheque Signer(s) X				Title(s) _____	
PLEASE ATTACH AN UNSIGNED SAMPLE CHEQUE							

TERMS AND CONDITIONS

Lessor hereby leases to Lessee and Lessee leases from Lessor the personal property listed and described herewith ("Equipment") under the terms and conditions set forth herein. Lessee warrants that the Equipment is being leased and will be used for business and commercial purposes only. This Contract ("Lease Agreement") shall not become binding on Lessor until accepted in writing by Lessor as evidenced by the signature of a duly authorized representative of Lessor. Lessee acknowledges that the Total Monthly Lease Amount contains Equipment charges only.

1. NON-CANCELLABLE CONTRACT. This Lease Agreement cannot be terminated during the term set forth ("Term") except as expressly provided herein.
2. LEASE PAYMENTS. Lessee shall pay to Lessor on the first day of each month of the Term the Total Monthly Lease Amount (the "Lease Payments") set forth above commencing on the Lease Commencement Date specified above and continuing for the Term. Lessee will not assert against Lessor any claim by way of abatement, defense, setoff, compensation or counterclaim. The Term shall commence on the first day of the month following equipment delivery and rent shall be pro-rated from the date of equipment delivery until the Term commences.
3. ADVANCE PAYMENTS. The Advance Payments as set forth above, shall be paid to Lessor by Lessee on the Lease Commencement Date specified above and shall be applied to the cost of the Equipment as a down payment. Lessee acknowledges and agrees that the Advance Payment does not constitute equity in the Equipment and further acknowledges that the Lease Payments have been calculated on the basis that the Advance Payments have offset the equipment cost.
4. LOCATION AND USE. The Equipment shall be located and used at the place designated herein identified as the above noted billing address unless notified otherwise and locations as specified in the attached schedule(s), and shall not be moved without the prior written consent of Lessor. Notwithstanding the foregoing, motor vehicles, trailers, or other goods of a type normally used in more than one jurisdiction, need not be kept at a specific location but shall at all times be under Lessee's control and shall not be domiciled outside Canada without prior written consent of the Lessor. Lessee shall at its own cost and expense keep the Equipment in good repair, condition and working order and furnish all parts and servicing required therefore. Lessee shall cause the Equipment to be maintained and operated carefully in compliance with manufacturer's recommendations and applicable laws and regulations present or future, by competent and duly qualified personnel only. Lessor may inspect the Equipment at any time upon reasonable prior notice to Lessee. Any improvements resulting from any accessions, attachments, additions, changes, modifications or other alterations to the Equipment shall immediately form part of the Equipment and become subject to this Lease Agreement. The Equipment shall remain as separately identifiable, personal and moveable property and shall not be affixed to real property, without the Lessor's prior written consent. If the Equipment is to be affixed to any real property, the Lessee acknowledges and agrees that the Lessor may file a notice of security interest against such real property and the Location of the Equipment as set out above shall be the address of such real property.
5. REPRESENTATIONS AND WARRANTIES. Lessee acknowledges that the vendor and/or manufacturer of the Equipment and the Equipment and its specifications have been selected by the Lessee for the purpose of the lease thereof to the Lessee under this Lease Agreement. Lessor makes no representation or warranty, express or implied, legal, statutory, customary or otherwise in respect to the Equipment, including but without limitation the merchantability, condition, design, operation or fitness for purpose of use thereof or its freedom from liens and encumbrances. If the Equipment is not properly installed, does not operate as

intended by Lessee or as represented by the manufacturer or vendor, totally fails to function or perform so as to give rise to a fundamental breach or alleged fundamental breach with respect to the Equipment, or is unacceptable for any other reason whatsoever, Lessee shall claim only against such vendor or manufacturer under such warranties made available to Lessee and shall nevertheless unconditionally pay Lessor all Lease Payments and other amounts payable hereunder without abatement, defense or set off. Lessor hereby assigns to Lessee for and during the applicable Term, the warranties, if any and if assignable, of the manufacturer with respect to the Equipment.

6. **PRE-AUTHORIZED PAYMENT PLAN.** It is a condition of this Lease that Lessee make the Lease Payments by PAD. Lessee may revoke its authorization at any time. Written notification must be received by Lessor at least 30 days prior to the next scheduled PAD date. Lessee has certain recourse rights if any PAD does not comply with this Lease Agreement, including the right to reimbursement for any PAD that is not authorized or consistent with this Lease Agreement. To obtain a sample cancellation form, reimbursement claim form or for more information on the right to cancel a PAD agreement and payor recourse rights, Lessee is directed to its financial institution or to www.cdnpay.ca. Lessee agrees that termination of this authorization does not cancel or reduce its obligations under this Agreement. Lessee waives the right to receive prior notice of all other amounts to be debited and the dates on which such debits will be processed, as well as notice of further changes to such amounts or dates. Lessor may assign this authorization to any third party to whom it assigns its interest in this agreement. Any inquiries regarding the PAD can be directed to Lessor at the address noted above. The Lessee acknowledges and agrees that any fines, penalties, tickets, toll charges and the like, which the Lessor receives as a result of their title to the Equipment, are for the account of the Lessee and may be debited by PAD from Lessee's account.

7. **RETURN OF EQUIPMENT.** At the end of the term of the Lease Agreement, provided that Lessee does not elect to purchase the Equipment or renew this Lease Agreement, Lessee shall, at its own risk and expense, immediately return the Equipment to Lessor, or its designated agent, in the same condition as when delivered, ordinary wear and tear excepted resulting from normal use thereof alone allowed and without any missing or broken components or accessories, at such locations as Lessor shall designate. If any item of Equipment is damaged or does not meet the standards set forth above for return condition of such Equipment, or if the Lessee fails to discharge Lessee's obligations set forth above with regard to any item of Equipment, Lessee shall pay to Lessor, immediately upon demand, the fair market value applicable to such item of Equipment.

8. **RATE AND TAXES.** Lessee shall comply with all governmental laws, regulations and orders relating to this Lease Agreement, the Equipment and its use and agrees to pay when due all license fees, assessments and all taxes, including but not limited to sales, goods and services, property, excise, and other taxes now or hereafter imposed by any federal, provincial, municipal or other taxing authority upon this Lease Agreement or and Equipment, or the purchase, ownership, delivery, renting, possession, use, operation and return thereof (but excluding income and capital taxes of Lessor). Any fees, taxes or other lawful charges paid by Lessor upon failure of Lessee to make such payments shall at Lessor's option become immediately due from Lessee to Lessor.

9. **EQUIPMENT RISK AND INSURANCE.** The Equipment shall be at the risk of the Lessee. Lessee shall obtain and maintain for the entire Term and any Renewal Period of this Lease Agreement, at its own expense, insurance against liability arising from damage to property of others and bodily injury or personal injury, and insurance against loss or damage to the Equipment in such amounts, in such form, and with such insurers shall be satisfactory to Lessor. Each insurance policy will name Lessor as additional insured and loss payee and all policies shall contain a clause requiring the insurer to give Lessor at least thirty (30) days' prior written notice of any alteration in the terms or cancellation of the policy. Lessee shall furnish a certificate, or other evidence satisfactory to Lessor, on or before the Lease Commencement Date. Lessee irrevocably appoints Lessor as Lessee's attorney-in-fact to request required insurance coverages, make claims, receive payments and execute and endorse all documents, cheques, drafts or other instruments necessary or advisable to secure payments due under any policy contemplated hereby.

10. **LOSS OR DAMAGE.** Lessee shall bear all risk of loss associated with an Equipment, including the theft, destruction, or damage. (including, but not limited to, any condemnation, seizure, or requisition of title or use) ("Event of Loss"). When any Event of Loss occurs, Lessee shall immediately notify Lessor and, at the option of Lessor, shall (a) place such Equipment in good repair and working order; or (b) replace such Equipment with like Equipment (of the same year, make, model and accessories) in good repair and working order, with clear title to the replacement Equipment in Lessor; or (c) pay to the Lessor the Stipulated Loss Value of such Equipment. The "Stipulated Loss Value" for particular Equipment shall be an amount equal to: (i) the value of all the remaining Lease Payments payable to the expiration of the Term, plus (ii) the Lessor's estimated residual value of the Equipment. For greater certainty, if Lessor determines the Event of Loss constitutes a total loss, Lessee shall pay Lessor the Stipulated Loss Value of the Equipment less any insurance proceeds actually received by the Lessor.

11. **ASSIGNMENT.** Lessee shall not sell, assign, sublet, pledge, hypothecate or otherwise encumber or suffer a lien upon or against an interest in this Lease Agreement or the Equipment without the prior written consent of Lessor. In the event of an assignment, Lessee agrees to pay an assignment fee to Lessor of \$100.00 or Lessor's actual costs, whichever is greater. Lessor may assign this Lease Agreement at any time without notice to or consent of the Lessee. Lessee agrees to pay all Lease Payments hereunder unconditionally to any such assignee, without abatement, defense, set off, compensation or counterclaim. If required by assignee, Lessee shall make all Lease Payments directly to assignee and agrees to promptly execute and deliver such acknowledgements, agreements, all necessary documentation necessary to pre-authorize the Lease Payments automatically debited from Lessee's bank account and other instruments from time to time as may be requested by assignee, purchaser or secured party. Lessee agrees that it will not assert against any assignee any claims, defenses, setoffs, compensations, deductions or counterclaims it may now or hereafter be entitled to against Lessor and agrees not to terminate this Agreement due to any default on the part of the Lessor or Supplier whether or not arising hereunder. This assignment, sale and grant of security shall not relieve Lessor of its obligations to Lessee hereunder and Lessee agrees that this assignment shall not be construed as an assumption of such obligations by Assignee.

12. **TITLE.** Lessee shall have no right, title or interest in the Equipment other than, conditional upon Lessee's compliance with and fulfillment of the terms and conditions of this Agreement, the right to maintain possession and use of the Equipment for the full Term and any Renewal Period. Lessor may require plates or markings to be affixed to or placed on the Equipment indicating Lessor is the owner. Lessor and Lessee hereby confirm their intent that the Equipment shall always remain and be deemed moveable property, even though said Equipment may hereinafter become attached or affixed to realty.

13. **DEFAULT.** Lessee is in default under this Lease Agreement if: (i) Lessee fails to pay any Lease Payments or other amounts payable hereunder on the due date; (ii) Lessee fails to perform or observe any covenant, condition or agreement to be performed or observed hereunder; (iii) any representation or warranty made by Lessee herein or in any document or certificate furnished to Lessor in connection herewith or pursuant hereto is incorrect at any time in any material respect; (iv) Lessee becomes insolvent or bankrupt or makes an assignment for the benefit of creditors or consents to the appointment of a trustee or receiver, or a trustee or receiver is appointed for Lessee or for a substantial part of its property without its consent; (v) if Lessee defaults under any other lease, contract or other agreement between Lessee and Lessor; (vi) any item of Equipment is confiscated, forfeited or seized or otherwise attached by anyone pursuant to any legal process or other means, or is used in any illegal activity; or (vii) Lessee shall suffer a material adverse change in its financial condition or operations. If a default occurs, Lessor in its absolute discretion may: (a) enter upon the premises where such Equipment is located and take immediate possession thereof, whether it is affixed to realty or not, and remove the same, without liability to Lessor for or by reason of such entry or taking of possession, and with or without terminating this Lease Agreement, sell, rent, or otherwise dispose of the same for such consideration and upon such terms and conditions as Lessor may reasonably deem fit and receive, hold and apply the same against any monies expressed to be payable from time to time by Lessee hereunder; (b) cancel any licence plate attributed to the Equipment even if such plate is in the Lessee's name; (c) terminate this Lease Agreement; (d) declare the total amount or any portion thereof of unpaid Lease Payments and other amounts due and to become due hereunder for the Term immediately due and payable, and by written notice to Lessee specifying a payment date not earlier than five (5) days from the date of such notice, require Lessee to pay to Lessor on the date specified in such notice, the (i) the value of all the remaining Lease Payments payable to the expiration of the Term, plus (ii) the Lessor's estimated residual value of the Equipment (e) as a late charge, require the payment of interest at the rate of 24% per annum on any overdue payment until paid. No remedy referred to in this section is intended to be exclusive, but each shall be cumulative and in addition to any other remedy referred to above or otherwise available to Lessor at law or in equity. Lessee agrees that Equipment is of a type customarily sold on a recognized market and hereby waives any right to notice of sale under the applicable personal property security legislation. In the event Lessor repossesses and sells, rents or re-leases each item of Equipment, the proceeds of any such sale or agreement shall be applied to reimburse Lessor for Lender's damages, Lessor shall be entitled to any surplus and Lessee shall remain liable for any deficiency.

14. **NOTICES.** Any notices and demands require to be given herein shall be given to the parties in writing and by registered mail at the address herein set forth, or to such other address as the parties may hereafter substitute by written notice given in the manner prescribed in this section. Lessor and Lessee hereby agree that all documents, including this Lease Agreement, sent by facsimile or other means of electronic transmission to the other party shall be considered to be original documents.

15. **FURTHER ASSURANCES.** Lessee will promptly execute and deliver to Lessor such further documents and take such further action as Lessor may request in order to more effectively carry out the intent and purpose hereof. At Lessor's request, Lessee shall send Lessor its audited and/or unaudited financial statements within fourteen (14) days of such request.

16. **CHARGES.** Lessee shall pay to Lessor a late charge of ten dollars (\$10.00) for each month or part thereof for which Lease Payments or other sum payable hereunder shall be delinquent together with interest on any and all delinquent payments and amounts in default from the date thereof until paid in full at there rate of

Navdeep

24% per annum calculated monthly. Lessee further agrees to pay to Lessor a returned cheque or non-sufficient funds (NSF) charge in an amount equal to \$75.00 for the first occurrence and \$100.00 for any subsequent NSF, plus other amounts allowed by law. Lessee also agrees to pay as additional rent, reasonable administration charges as set out in Lessor's current schedule of charges from time to time. Lessee shall pay any and all charges and costs incurred by the Lessor in connections with the enforcement of its rights under this Lease Agreement, including reasonable legal expenses and expenses incurred in the repossession of the Equipment. Should Lessee fail to perform any obligation hereunder, Lessor may cause such obligation to be performed and the cost thereof together with interest thereon at 24% per annum shall be considered as an additional Lease Payment to be paid by Lessee.

17. CREDIT INVESTIGATION AND PRIVACY WAIVERS. We may receive from and disclose to any person or business entity including without limitation, any of our affiliates or credit reporting agencies, for any purpose, information about your accounts, credit application and credit experience and you authorizes any person or entity to release any information related to your accounts to us. This shall be a continuing authorization for all present and future disclosures of your account information.

18. GENERAL INDEMNITY. Lessee indemnifies and agrees to defend and hold Lessor, its officers, directors and employees, and any successors, assignee or secured party of Lessor, harmless from and against all claims, costs, expenses (including, but not limited to, legal fees), damages and liabilities of any nature whatsoever that may be imposed on, incurred by or asserted against an indemnified party with respect to any item of Equipment or its purchase, acceptance, delivery, ownership, leasing, possession, maintenance, use, operation or transportation, whether or not other parties are involved. The liability of Lessee to make indemnification payments shall, notwithstanding any expiration, cancellation or other termination (whether voluntary, as the result of a default or otherwise) of this Lease Agreement, continue to exist until such indemnity payments are irrevocably made in full by Lessee and received by Lessor. If any claim is made against Lessee or Lessor, the party receiving notice of such claim shall promptly notify the other, but failure of the party receiving notice to so notify the other shall not relieve Lessee of any obligation hereunder.

19. LANGUAGE. The parties hereto agree that this document be written in the English language. Les parties aux présentes conviennent à ce que ce document soit rédigé en anglais.

20. WAIVER. No covenant or condition of this Lease Agreement can be waived except in writing by Lessor and any forbearance or indulgence by Lessor in any regard whatsoever shall not constitute a waiver of any covenant or conditions to be performed by Lessee to which the same may apply and, until complete performance by Lessee of said covenant or condition, Lessor shall be entitled to invoke any remedy available under this Lease Agreement or by law. No waiver by Lessor of any default shall constitute a waiver of any other default by Lessee or a waiver of Lessor's rights.

21. CO-LESSEES. Lessee and the Co-Lessee, if any, hereby agree that their respective liability for the payment and performance of obligations of the Lessee under this Lease Agreement shall be joint and several. Any reference to Lessee in this Lease Agreement shall be deemed to be a reference to the Co-Lessee, in any.

22. MISCELLANEOUS. This Lease Agreement shall be governed by the laws of the jurisdiction of which the Equipment was originally delivered to the Lessee. Time is of the essence with respect to this Lease Agreement. This Lease Agreement contains the whole of the agreement between the parties and there are no collateral agreements or conditions whatsoever relating to the Equipment or this Lease Agreement not specifically set forth or referred to herein and no modifications, amendments or variations shall be effective or binding unless agreed to in writing and properly executed by the parties. This Lease Agreement shall be binding upon and inure to the benefit of the parties hereto, their permitted successors and assigns. A facsimile copy of this Lease Agreement with facsimile signature(s) will be treated as an original and will be admissible as evidence of this Lease Agreement. Any provision of this Lease Agreement which is unenforceable in any jurisdiction shall, as to such jurisdiction, be ineffective to the extent of such prohibition or unenforceability without invalidating the remaining provisions hereof and any such prohibition or unenforceability in and jurisdiction shall not invalidate or render unenforceable such provisions in any other jurisdiction. The Lessee acknowledges and agrees that (i) clerical errors shall not affect the validity of this Lease Agreement and Lessor shall be entitled to unilaterally correct the same; and (ii) the Lessor shall be entitled and is hereby authorized to complete the equipment description on the face of this Lease Agreement. Lessor may register a financing statement and Lessee waives the receipt of and the right to receive a copy of any such registered statement or verification statement with respect thereto. To the extent not prohibited by law, Lessee hereby waives the benefit of all provisions of any law, statute or regulation which would in any manner affect Lessor's rights and remedies hereunder, including provisions of the limitations of Civil Rights Act of Saskatchewan.

23. Vehicle Full Service Agreement as per Schedule "B".

24. GUARANTEE AND INDEMNITY. The undersigned (hereinafter the "Indemnitor"), hereby irrevocably and unconditionally guarantees the Lessor payment of all Lease Payments and promises to satisfy all other obligations arising hereunder this Lease (the "Obligations"), in the event that the Lessee(s) fails to fulfill any its contractual obligations under this Lease. This is an absolute, unconditional, irrevocable and continuing guarantee and indemnity that will remain in full force and effect until all of the Obligations have been indefeasibly satisfied in full, and Lessor has terminated this Guarantee and Indemnity. This Guarantee and Indemnity will not be affected by any surrender, exchange, acceptance, compromise or release by Lessor of any other party, or any other guarantee or any security held by it for any of the Obligations, by any failure of the Lessor to take any steps to perfect or maintain its lien or security interest in or to preserve its rights to any security or other collateral for any of the Obligations, or by any irregularity, unenforceability or invalidity of any of the Obligations or any part thereof or any security or other guarantee thereof. The Indemnitor also hereby waives the benefit of further discussion and division.

Date: November 28, 2023

FOR OFFICE USE ONLY

EXECUTED AS LESSOR:

TPINE LEASING CAPITAL CORPORATION


By  Authorized Signatory

LESSEE

(Full Legal Name)

WINGS FREIGHTWAY INC.

The undersigned affirms that he/she is duly authorized to execute this Lease.

By  Title _____ Date 11/28/2023
Authorized Signatory

INDEMNITOR

(Full Legal Name) Balwant Singh Samra

The undersigned affirms that he/she is duly authorized to execute the Certificate

By  Authorized Signatory

CO-LESSEE

(Full Legal Name)

By _____ Authorized Signatory



*** SCHEDULE "A" ***

To Lease Agreement dated November 28, 2023, between TPine Leasing Capital Corporation and WINGS FREIGHTWAY INC..

End of Term Options Notwithstanding anything contained in the Lease Agreement to the contrary, so long as no default shall have occurred and be continuing, you shall have the following options at the end of the Initial Term (the "Option Date"):

(a) Purchase all, but not less than all, the Equipment leased pursuant to this Lease Schedule on an "as is, where is" basis, without representation or warranty, express or implied, at a price equal to:

\$10.00

plus any applicable taxes (the "Purchase Price"). After such notice and payment, provided no Default exists, you shall acquire our interest in the Equipment on the Option Date on an "as is, where is" basis without any condition, representation or warranty by us of any kind whatsoever except that you will acquire such interest free and clear of all liens and encumbrances created by or through us; or

["Fair Market Value" shall mean an amount equal to the sales price obtainable in an arms-length transaction between a willing and informed buyer under no compulsion to buy and a willing and informed seller with no compulsion to sell and assuming the Equipment is in the condition required by the Lease.]

(b) Return all but not less than all, the Equipment at your expense to a location in Canada as we designate; or

(c) Continue to lease the Equipment on a month to month basis for the same monthly Lease Payments and on the same terms and conditions of the Lease Agreement.

Should you fail to notify us of your election within ninety (90) days of the end of the Initial Term, you shall be deemed to have elected option (c) above, provided however, you shall have the option to purchase all, but not less than all, of the Equipment at any time upon written notice of ninety (90) days to us for the Purchase Price.

IN WITNESS WHEREOF, the parties hereto have caused this Lease Schedule to be duly executed on the date set forth below by their authorized representatives.

TPINE LEASING CAPITAL CORPORATION

WINGS FREIGHTWAY INC.

By: _____
Name: _____
Title: _____

A handwritten signature in blue ink, appearing to read 'Navdeep', is written over the signature line.

By: _____
Name: Balwant Singh Samra
Title: _____

A handwritten signature in blue ink, appearing to read 'Balwant Singh Samra', is written over the signature line.

By: _____
Name: Balwant Singh Samra
Title: _____



NO EQUITY LETTER

Date: November 28, 2023

Tpine Leasing Capital Corporation
6050 Dixie Rd
Mississauga, On. L5T 1A6

To whom it may concern

Reg :- Equipment Outlined below ("The Equipment")

New or Used	Model Year	Manufacturer	Model	Description	S No.
				<u>USED 2024 PETERBILT 579 WHITE BEARING S NO. 1XPBD49X2RD873497</u>	
				<u>USED 2024 PETERBILT 579 GREY BEARING S NO. 1XPBD49X8RD873505</u>	
				<u>USED 2023 PETERBILT 579 WHITE BEARING S NO. 1XPBDP9X8PD854340</u>	
				<u>USED 2023 PETERBILT 579 RED BEARING S NO. 1XPBD49X5PD865228</u>	

This letter is to confirm that I/we the undersigned have requested TPINE LEASING CAPITAL CORPORATION to purchase the Equipment for the purposes of leasing it to the undersigned.

The undersigned confirms that the deposit and/or equipment trade reflected on the vendor invoice from PRIDE MISSISSAUGA BVC, was made on behalf of TPINE LEASING CAPITAL CORPORATION. The undersigned acknowledges and confirms that regardless of any deposit and/or equipment trade, no interest has been acquired in the Equipment. TPINE LEASING CAPITAL CORPORATION will acquire, beneficially and otherwise absolute right, ownership and interest into the Equipment. The undersigned agrees no interest and/or equity in the Equipment will be claimed, as a result of the deposit and/or equipment trade.

WINGS FREIGHTWAY INC

By 
Name Balwant Singh Samra
Title _____

Balwant Singh Samra

By 
Name Balwant Singh Samra
Title _____



DELIVERY AND ACCEPTANCE CERTIFICATE

DATED: November 30, 2023

WINGS FREIGHTWAY INC.

51 Worcester Rd

Etobicoke, ON M9W 4K2

Hereinafter called <<Lessee>>

Equipment: USED 2024 PETERBILT 579 WHITE BEARING S NO. 1XPBD49X2RD873497
USED 2024 PETERBILT 579 GREY BEARING S NO. 1XPBD49X8RD873505
USED 2023 PETERBILT 579 WHITE BEARING S NO. 1XPBDP9X8PD854340
USED 2023 PETERBILT 579 RED BEARING S NO. 1XPBD49X5PD865228

1. The undersigned hereby represents and certifies to Lessor that each item of Equipment specified in the Lease

(A) has been delivered to and inspected by Lessee as of the date hereof;

(B) is satisfactory for financing under the Lease and is unconditionally and irrevocably accepted;

(C) is in good condition and operates properly;

(D) is subject to all of the terms and conditions of the Lease; and

(E) an authorized officer of the undersigned has executed this Acceptance Certificate.

2. This executed Acceptance Certificate constitutes an instruction to Lessor to pay for the Equipment and to commence the Lease and to make all automatic withdrawals provided for in the Lease.

TPINE LEASING CAPITAL CORPORATION

By: _____
Name: _____
Title: _____

WINGS FREIGHTWAY INC.

By: _____
Name: Balwant Singh Samra
Title: _____

GUARANTEE (corporate)

Complete in block letters

1. In consideration of the transactions entered by Tpine Leasing Capital Corporation (hereinafter called Tpine Leasing Capital Corporation) an The Lessee **WINGS FREIGHTWAY INC.** The undersigned (hereinafter called The Guarantor) hereby guarantees Tpine Leasing Capital Corporation unconditionally, jointly and severally with The Lessee the payment of all debts, amounts or obligations, direct or indirect, now owed or that will become owed to Tpine Leasing Capital Corporation by The Lessee or its successors and ensued from the above-mentioned leasing agreement;
2. In all event of execution of the present guarantee, Tpine Leasing Capital Corporation will not have to assert or exhaust its recourses or guarantees against The Lessee or any other person, and The Guarantor shall not assert any right which Tpine Leasing Capital Corporation may or might have against The Lessee or any other person;
3. The present guarantee shall not be diminished or affected in any way because of:
- a) renewal, modification, extension of delay that might be convened between Tpine Leasing Capital Corporation and The Lessee regarding the terms and conditions of the above mentioned Leasing Agreement;
 - b) remittance, total or partial leave of a guarantee;
 - c) renunciation to defaults of The Lessee or any other person;
 - d) release, modification, adjustment or addition regarding any obligation of The Lessee or any other person;
 - e) attribution of the amounts received by Tpine Leasing Capital Corporation from The Lessee or any other person;
 - f) invalidity or non-execution of any writing or commitment by The Lessee or any other person;
 - g) changes in The Lessee's organizational structure or of its managers.
4. The Guarantor expressly relinquishes the privileges of division and discussion and its liability will be paramount, total and absolute without consideration for the liability of The Lessee, of Tpine Leasing Capital Corporation or any other person;
5. The obligations of The Guarantor under the present Guarantee will bind its heirs, testamentary executors, administrators, legal representatives and successors, and any release to any other guarantor shall not relieve The Guarantor from his commitments in accordance with this Guarantee;
6. The Guarantor shall not be released from his commitments in this Guarantee as long as all amounts owed to Tpine Leasing Capital Corporation by The Lessee in accordance with the above mentioned Leasing Agreement, on any grounds in capital, interest, costs and others, are not be paid in full, and, more specifically, The Guarantor who commits as such within the scope of his functions as an administrator, shareholder or spouse will not be released as a result of the end of said functions. The Guarantor recognizes that Tpine Leasing Capital Corporation would not have committed in favour of The Lessee without this Guarantee;
7. The Guarantor elects residence in the judiciary district of Ontario for any and all legal proceedings and tribunal jurisdiction;
8. This Guarantee may be transferred or transported without notice, and the assignee shall possess all its ensued rights as Tpine Leasing Capital Corporation itself.

IN WITNESS THEREOF,
The Guarantor has signed in

Mississauga on this November 28, 2023

Witness Signature



Witness Name (block letters)

Address

2834021 ONTARIO INC.

Guarantor Name

Guarantor Signature

51 WORCESTER RD, Etobicoke, Ontario M9W 4K2

Address

GUARANTEE (corporate)

Complete in block letters

1. In consideration of the transactions entered by Tpine Leasing Capital Corporation (hereinafter called Tpine Leasing Capital Corporation) an The Lessee **WINGS FREIGHTWAY INC.** The undersigned (hereinafter called The Guarantor) hereby guarantees Tpine Leasing Capital Corporation unconditionally, jointly and severally with The Lessee the payment of all debts, amounts or obligations, direct or indirect, now owed or that will become owed to Tpine Leasing Capital Corporation by The Lessee or its successors and ensued from the above-mentioned leasing agreement;
2. In all event of execution of the present guarantee, Tpine Leasing Capital Corporation will not have to assert or exhaust its recourses or guarantees against The Lessee or any other person, and The Guarantor shall not assert any right which Tpine Leasing Capital Corporation may or might have against The Lessee or any other person;
3. The present guarantee shall not be diminished or affected in any way because of:
- a) renewal, modification, extension of delay that might be convened between Tpine Leasing Capital Corporation and The Lessee regarding the terms and conditions of the above mentioned Leasing Agreement;
 - b) remittance, total or partial leave of a guarantee;
 - c) renunciation to defaults of The Lessee or any other person;
 - d) release, modification, adjustment or addition regarding any obligation of The Lessee or any other person;
 - e) attribution of the amounts received by Tpine Leasing Capital Corporation from The Lessce or any other person;
 - f) invalidity or non-execution of any writing or commitment by The Lessee or any other person;
 - g) changes in The Lessee's organizational structure or of its managers.
4. The Guarantor expressly relinquishes the privileges of division and discussion and its liability will be paramount, total and absolute without consideration for the liability of The Lessee, of Tpine Leasing Capital Corporation or any other person;
5. The obligations of The Guarantor under the present Guarantee will bind its heirs, testamentary executors, administrators, legal representatives and successors, and any release to any other guarantor shall not relieve The Guarantor from his commitments in accordance with this Guarantee;
6. The Guarantor shall not be released from his commitments in this Guarantee as long as all amounts owed to Tpine Leasing Capital Corporation by The Lessee in accordance with the above mentioned Leasing Agreement, on any grounds in capital, interest, costs and others, are not be paid in full, and, more specifically, The Guarantor who commits as such within the scope of his functions as an administrator, shareholder or spouse will not be released as a result of the end of said functions. The Guarantor recognizes that Tpine Leasing Capital Corporation would not have committed in favour of The Lessee without this Guarantee;
7. The Guarantor elects residence in the judiciary district of Ontario for any and all legal proceedings and tribunal jurisdiction;
8. This Guarantee may be transferred or transported without notice, and the assignee shall possess all its ensued rights as Tpine Leasing Capital Corporation itself.

IN WITNESS THEREOF,
The Guarantor has signed in

Mississauga on this November 28, 2023

Witness Signature

Witness Name (block letters)

Address

I-WAY LOGISTICS INC.

Guarantor Name

Guarantor Signature

2792 SLOUGH STREET, Mississauga, Ontario L4T 1G3
Address

GUARANTEE (corporate)

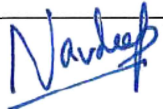
Complete in block letters

1. In consideration of the transactions entered by Tpine Leasing Capital Corporation (hereinafter called Tpine Leasing Capital Corporation) an The Lessee **WINGS FREIGHTWAY INC.** The undersigned (hereinafter called The Guarantor) hereby guarantees Tpine Leasing Capital Corporation unconditionally, jointly and severally with The Lessee the payment of all debts, amounts or obligations, direct or indirect, now owed or that will become owed to Tpine Leasing Capital Corporation by The Lessee or its successors and ensued from the above-mentioned leasing agreement;
2. In all event of execution of the present guarantee, Tpine Leasing Capital Corporation will not have to assert or exhaust its recourses or guarantees against The Lessee or any other person, and The Guarantor shall not assert any right which Tpine Leasing Capital Corporation may or might have against The Lessee or any other person;
3. The present guarantee shall not be diminished or affected in any way because of:
- a) renewal, modification, extension of delay that might be convened between Tpine Leasing Capital Corporation and The Lessee regarding the terms and conditions of the above mentioned Leasing Agreement;
 - b) remittance, total or partial leave of a guarantee;
 - c) renunciation to defaults of The Lessee or any other person;
 - d) release, modification, adjustment or addition regarding any obligation of The Lessee or any other person;
 - e) attribution of the amounts received by Tpine Leasing Capital Corporation from The Lessee or any other person;
 - f) invalidity or non-execution of any writing or commitment by The Lessee or any other person;
 - g) changes in The Lessee's organizational structure or of its managers.
4. The Guarantor expressly relinquishes the privileges of division and discussion and its liability will be paramount, total and absolute without consideration for the liability of The Lessee, of Tpine Leasing Capital Corporation or any other person;
5. The obligations of The Guarantor under the present Guarantee will bind its heirs, testamentary executors, administrators, legal representatives and successors, and any release to any other guarantor shall not relieve The Guarantor from his commitments in accordance with this Guarantee;
6. The Guarantor shall not be released from his commitments in this Guarantee as long as all amounts owed to Tpine Leasing Capital Corporation by The Lessee in accordance with the above mentioned Leasing Agreement, on any grounds in capital, interest, costs and others, are not be paid in full, and, more specifically, The Guarantor who commits as such within the scope of his functions as an administrator, shareholder or spouse will not be released as a result of the end of said functions. The Guarantor recognizes that Tpine Leasing Capital Corporation would not have committed in favour of The Lessee without this Guarantee;
7. The Guarantor elects residence in the judiciary district of Ontario for any and all legal proceedings and tribunal jurisdiction;
8. This Guarantee may be transferred or transported without notice, and the assignee shall possess all its ensued rights as Tpine Leasing Capital Corporation itself.

IN WITNESS THEREOF,
The Guarantor has signed in

Mississauga on this November 28, 2023

Witness Signature




Witness Name (block letters)

Address

I-WAY TRANSPORT INC.

Guarantor Name



Guarantor Signature

51 WORCESTER RD, Etobicoke, ON M9W 4K2
Address

2834021 SAMPLE LEASE ·



TPine Leasing Capital Corporation

LEASE AGREEMENT

						Lease Number 40520		
LESSEE	2834021 ONTARIO INC.				CONTACT	BALWANT SINGH SAMRA		
CO-LESSEE					TELEPHONE	905-956-2231		
CO-LESSEE					EMAIL			
BILLING ADDRESS	51 WORCESTER RD			CITY AND PROVINCE	Etobicoke, ON		POSTAL CODE	M9W 4K2
	ASSET DESCRIPTION	Refer Equipment Schedule						
	EQUIPMENT LOCATION							
TERM	EXECUTION DATE	FIRST MONTHLY PAYMENT	MONTHLY PAYMENT AMOUNT		GST/HST/QST	TOTAL MONTHLY LEASE AMOUNT	END OF TERM OPTIONS	
71 Months	08/08/2023	\$7,685.28 + Applicable Taxes	RENTAL	\$7,685.28	\$999.08	\$8,684.36	\$10.00	
			GAP	\$0.00				
			WALK-AWAY	\$0.00			See Schedule A for more options	
PRE-AUTHORIZED DEBIT ("PAD")		Lessor is hereby authorized to deduct the monthly recurring Lease Payments set out above, plus any other amounts due under this Lease Agreement, on the first day of each month from the bank account as outlined on the attached sample cheque. LESSEE HEREBY WAIVES THE RIGHT TO RECEIVE PRE NOTIFICATION OF THE ADDITIONAL AMOUNTS TO BE WITHDRAWN HEREUNDER. The terms of this authorization are further supplemented in section 6 hereof. This PAD is for business purposes.						
1st		Authorized Cheque Signer(s) X  Title(s) _____						
PLEASE ATTACH AN UNSIGNED SAMPLE CHEQUE								

TERMS AND CONDITIONS

Lessor hereby leases to Lessee and Lessee leases from Lessor the personal property listed and described herewith ("Equipment") under the terms and conditions set forth herein. Lessee warrants that the Equipment is being leased and will be used for business and commercial purposes only. This Contract ("Lease Agreement") shall not become binding on Lessor until accepted in writing by Lessor as evidenced by the signature of a duly authorized representative of Lessor. Lessee acknowledges that the Total Monthly Lease Amount contains Equipment charges only.

1. NON-CANCELLABLE CONTRACT. This Lease Agreement cannot be terminated during the term set forth ("Term") except as expressly provided herein.
2. LEASE PAYMENTS. Lessee shall pay to Lessor on the first day of each month of the Term the Total Monthly Lease Amount (the "Lease Payments") set forth above commencing on the Lease Commencement Date specified above and continuing for the Term. Lessee will not assert against Lessor any claim by way of abatement, defense, setoff, compensation or counterclaim. The Term shall commence on the first day of the month following equipment delivery and rent shall be pro-rated from the date of equipment delivery until the Term commences.
3. ADVANCE PAYMENTS. The Advance Payments as set forth above, shall be paid to Lessor by Lessee on the Lease Commencement Date specified above and shall be applied to the cost of the Equipment as a down payment. Lessee acknowledges and agrees that the Advance Payment does not constitute equity in the Equipment and further acknowledges that the Lease Payments have been calculated on the basis that the Advance Payments have offset the equipment cost.
4. LOCATION AND USE. The Equipment shall be located and used at the place designated herein identified as the above noted billing address unless notified otherwise and locations as specified in the attached schedule(s), and shall not be moved without the prior written consent of Lessor. Notwithstanding the foregoing, motor vehicles, trailers, or other goods of a type normally used in more than one jurisdiction, need not be kept at a specific location but shall at all times be under Lessee's control and shall not be domiciled outside Canada without prior written consent of the Lessor. Lessee shall at its own cost and expense keep the Equipment in good repair, condition and working order and furnish all parts and servicing required therefore. Lessee shall cause the Equipment to be maintained and operated carefully in compliance with manufacturer's recommendations and applicable laws and regulations present or future, by competent and duly qualified personnel only. Lessor may inspect the Equipment at any time upon reasonable prior notice to Lessee. Any improvements resulting from any accessions, attachments, additions, changes, modifications or other alterations to the Equipment shall immediately form part of the Equipment and become subject to this Lease Agreement. The Equipment shall remain as separately identifiable, personal and moveable property and shall not be affixed to real property, without the Lessor's prior written consent. If the Equipment is to be affixed to any real property, the Lessee acknowledges and agrees that the Lessor may file a notice of security interest against such real property and the Location of the Equipment as set out above shall be the address of such real property.
5. REPRESENTATIONS AND WARRANTIES. Lessee acknowledges that the vendor and/or manufacturer of the Equipment and the Equipment and its specifications have been selected by the Lessee for the purpose of the lease thereof to the Lessee under this Lease Agreement. Lessor makes no representation or warranty, express or implied, legal, statutory, customary or otherwise in respect to the Equipment, including but without limitation the merchantability, condition,

design, operation or fitness for purpose of use thereof or its freedom from liens and encumbrances. If the Equipment is not properly installed, does not operate as intended by Lessee or as represented by the manufacturer or vendor, totally fails to function or perform so as to give rise to a fundamental breach or alleged fundamental breach with respect to the Equipment, or is unacceptable for any other reason whatsoever, Lessee shall claim only against such vendor or manufacturer under such warranties made available to Lessee and shall nevertheless unconditionally pay Lessor all Lease Payments and other amounts payable hereunder without abatement, defense or set off. Lessor hereby assigns to Lessee for and during the applicable Term, the warranties, if any and if assignable, of the manufacturer with respect to the Equipment.

6. **PRE-AUTHORIZED PAYMENT PLAN.** It is a condition of this Lease that Lessee make the Lease Payments by PAD. Lessee may revoke its authorization at any time. Written notification must be received by Lessor at least 30 days prior to the next scheduled PAD date. Lessee has certain recourse rights if any PAD does not comply with this Lease Agreement, including the right to reimbursement for any PAD that is not authorized or consistent with this Lease Agreement. To obtain a sample cancellation form, reimbursement claim form or for more information on the right to cancel a PAD agreement and payor recourse rights, Lessee is directed to its financial institution or to www.cdnpay.ca. Lessee agrees that termination of this authorization does not cancel or reduce its obligations under this Agreement. Lessee waives the right to receive prior notice of all other amounts to be debited and the dates on which such debits will be processed, as well as notice of further changes to such amounts or dates. Lessor may assign this authorization to any third party to whom it assigns its interest in this agreement. Any inquiries regarding the PAD can be directed to Lessor at the address noted above. The Lessee acknowledges and agrees that any fines, penalties, tickets, toll charges and the like, which the Lessor receives as a result of their title to the Equipment, are for the account of the Lessee and may be debited by PAD from Lessee's account.

7. **RETURN OF EQUIPMENT.** At the end of the term of the Lease Agreement, provided that Lessee does not elect to purchase the Equipment or renew this Lease Agreement, Lessee shall, at its own risk and expense, immediately return the Equipment to Lessor, or its designated agent, in the same condition as when delivered, ordinary wear and tear excepted resulting from normal use thereof alone allowed and without any missing or broken components or accessories, at such locations as Lessor shall designate. If any item of Equipment is damaged or does not meet the standards set forth above for return condition of such Equipment, or if the Lessee fails to discharge Lessee's obligations set forth above with regard to any item of Equipment, Lessee shall pay to Lessor, immediately upon demand, the fair market value applicable to such item of Equipment.

8. **RATE AND TAXES.** Lessee shall comply with all governmental laws, regulations and orders relating to this Lease Agreement, the Equipment and its use and agrees to pay when due all license fees, assessments and all taxes, including but not limited to sales, goods and services, property, excise, and other taxes now or hereafter imposed by any federal, provincial, municipal or other taxing authority upon this Lease Agreement or the Equipment, or the purchase, ownership, delivery, renting, possession, use, operation and return thereof (but excluding income and capital taxes of Lessor). Any fees, taxes or other lawful charges paid by Lessor upon failure of Lessee to make such payments shall at Lessor's option become immediately due from Lessee to Lessor.

9. **EQUIPMENT RISK AND INSURANCE.** The Equipment shall be at the risk of the Lessee. Lessee shall obtain and maintain for the entire Term and any Renewal Period of this Lease Agreement, at its own expense, insurance against liability arising from damage to property of others and bodily injury or personal injury, and insurance against loss or damage to the Equipment in such amounts, in such form, and with such insurers shall be satisfactory to Lessor. Each insurance policy will name Lessor as additional insured and loss payee and all policies shall contain a clause requiring the insurer to give Lessor at least thirty (30) days' prior written notice of any alteration in the terms or cancellation of the policy. Lessee shall furnish a certificate, or other evidence satisfactory to Lessor, on or before the Lease Commencement Date. Lessee irrevocably appoints Lessor as Lessee's attorney-in-fact to request required insurance coverages, make claims, receive payments and execute and endorse all documents, cheques, drafts or other instruments necessary or advisable to secure payments due under any policy contemplated hereby.

10. **LOSS OR DAMAGE.** Lessee shall bear all risk of loss associated with an Equipment, including the theft, destruction, or damage. (Including, but not limited to, any condemnation, seizure, or requisition of title or use) ("Event of Loss"). When any Event of Loss occurs, Lessee shall immediately notify Lessor and, at the option of Lessor, shall (a) place such Equipment in good repair and working order; or (b) replace such Equipment with like Equipment (of the same year, make, model and accessories) in good repair and working order, with clear title to the replacement Equipment in Lessor; or (c) pay to the Lessor the Stipulated Loss Value of such Equipment. The "Stipulated Loss Value" for particular Equipment shall be an amount equal to: (i) the value of all the remaining Lease Payments payable to the expiration of the Term, plus (ii) the Lessor's estimated residual value of the Equipment. For greater certainty, if Lessor determines the Event of Loss constitutes a total loss, Lessee shall pay Lessor the Stipulated Loss Value of the Equipment less any insurance proceeds actually received by the Lessor.

11. **ASSIGNMENT.** Lessee shall not sell, assign, sublet, pledge, hypothecate or otherwise encumber or suffer a lien upon or against an interest in this Lease Agreement or the Equipment without the prior written consent of Lessor. In the event of an assignment, Lessee agrees to pay an assignment fee to Lessor of \$100.00 or Lessor's actual costs, whichever is greater. Lessor may assign this Lease Agreement at any time without notice to or consent of the Lessee. Lessee agrees to pay all Lease Payments hereunder unconditionally to any such assignee, without abatement, defense, set off, compensation or counterclaim. If required by assignee, Lessee shall make all Lease Payments directly to assignee and agrees to promptly execute and deliver such acknowledgements, agreements, all necessary documentation necessary to pre-authorize the Lease Payments automatically debited from Lessee's bank account and other instruments from time to time as may be requested by assignee, purchaser or secured party. Lessee agrees that it will not assert against any assignee any claims, defenses, setoffs, compensations, deductions or counterclaims it may now or hereafter be entitled to against Lessor and agrees not to terminate this Agreement due to any default on the part of the Lessor or Supplier whether or not arising hereunder. This assignment, sale and grant of security shall not relieve Lessor of its obligations to Lessee hereunder and Lessee agrees that this assignment shall not be construed as an assumption of such obligations by Assignee.

12. **TITLE.** Lessee shall have no right, title or interest in the Equipment other than, conditional upon Lessee's compliance with and fulfillment of the terms and conditions of this Agreement, the right to maintain possession and use of the Equipment for the full Term and any Renewal Period. Lessor may require plates or markings to be affixed to or placed on the Equipment indicating Lessor is the owner. Lessor and Lessee hereby confirm their intent that the Equipment shall always remain and be deemed moveable property, even though said Equipment may hereinafter become attached or affixed to realty.

13. **DEFAULT.** Lessee is in default under this Lease Agreement if: (i) Lessee fails to pay any Lease Payments or other amounts payable hereunder on the due date; (ii) Lessee fails to perform or observe any covenant, condition or agreement to be performed or observed hereunder; (iii) any representation or warranty made by Lessee herein or in any document or certificate furnished to Lessor in connection herewith or pursuant hereto is incorrect at any time in any material respect; (iv) Lessee becomes insolvent or bankrupt or makes an assignment for the benefit of creditors or consents to the appointment of a trustee or receiver; or a trustee or receiver is appointed for Lessee or for a substantial part of its property without its consent; (v) if Lessee defaults under any other lease, contract or other agreement between Lessee and Lessor; (vi) any item of Equipment is confiscated, forfeited or seized or otherwise attached by anyone pursuant to any legal process or other means, or is used in any illegal activity; or (vii) Lessee shall suffer a material adverse change in its financial condition or operations. If a default occurs, Lessor in its absolute discretion may: (a) enter upon the premises where such Equipment is located and take immediate possession thereof, whether it is affixed to realty or not, and remove the same, without liability to Lessor for or by reason of such entry or taking of possession, and with or without terminating this Lease Agreement, sell, rent, or otherwise dispose of the same for such consideration and upon such terms and conditions as Lessor may reasonably deem fit and receive, hold and apply the same against any monies expressed to be payable from time to time by Lessee hereunder; (b) cancel any licence plate attributed to the Equipment even if such plate is in the Lessee's name; (c) terminate this Lease Agreement; (d) declare the total amount or any portion thereof of unpaid Lease Payments and other amounts due and to become due hereunder for the Term immediately due and payable, and by written notice to Lessee specifying a payment date not earlier than five (5) days from the date of such notice, require Lessee to pay to Lessor on the date specified in such notice, the (i) the value of all the remaining Lease Payments payable to the expiration of the Term, plus (ii) the Lessor's estimated residual value of the Equipment (e) as a late charge, require the payment of interest at the rate of 24% per annum on any overdue payment until paid. No remedy referred to in this section is intended to be exclusive, but each shall be cumulative and in addition to any other remedy referred to above or otherwise available to Lessor at law or in equity. Lessee agrees that Equipment is of a type customarily sold on a recognized market and hereby waives any right to notice of sale under the applicable personal property security legislation. In the event Lessor repossesses and sells, rents or re-leases each item of Equipment, the proceeds of any such sale or agreement shall be applied to reimburse Lessor for Lender's damages. Lessor shall be entitled to any surplus and Lessee shall remain liable for any deficiency.

14. **NOTICES.** Any notices and demands require to be given herein shall be given to the parties in writing and by registered mail at the address herein set forth, or to such other address as the parties may hereafter substitute by written notice given in the manner prescribed in this section. Lessor and Lessee hereby agree that all documents, including this Lease Agreement, sent by facsimile or other means of electronic transmission to the other party shall be considered to be original documents.

15. **FURTHER ASSURANCES.** Lessee will promptly execute and deliver to Lessor such further documents and take such further action as Lessor may request in order to more effectively carry out the intent and purpose hereof. At Lessor's request, Lessee shall send Lessor its audited and/or unaudited financial statements within fourteen (14) days of such request.

B-S

16. **CHARGES.** Lessee shall pay to Lessor a late charge of ten dollars (\$10.00) for each month or part thereof for which Lease Payments or other sum payable hereunder shall be delinquent together with interest on any and all delinquent payments and amounts in default from the date thereof until paid in full at there rate of 24% per annum calculated monthly. Lessee further agrees to pay to Lessor a returned cheque or non-sufficient funds (NSF) charge in an amount equal to \$75.00 for the first occurrence and \$100.00 for any subsequent NSF, plus other amounts allowed by law. Lessee also agrees to pay as additional rent, reasonable administration charges as set out in Lessor's current schedule of charges from time to time. Lessee shall pay any and all charges and costs incurred by the Lessor in connections with the enforcement of its rights under this Lease Agreement, including reasonable legal expenses and expenses incurred in the repossession of the Equipment. Should Lessee fail to perform any obligation hereunder, Lessor may cause such obligation to be performed and the cost thereof together with interest thereon at 24% per annum shall be considered as an additional Lease Payment to be paid by Lessee.

17. **CREDIT INVESTIGATION AND PRIVACY WAIVERS.** We may receive from and disclose to any person or business entity including without limitation, any of our affiliates or credit reporting agencies, for any purpose, information about your accounts, credit application and credit experience and you authorizes any person or entity to release any information related to your accounts to us. This shall be a continuing authorization for all present and future disclosures of your account information.

18. **GENERAL INDEMNITY.** Lessee indemnifies and agrees to defend and hold Lessor, its officers, directors and employees, and any successors, assignee or secured party of Lessor, harmless from and against all claims, costs, expenses (including, but not limited to, legal fees), damages and liabilities of any nature whatsoever that may be imposed on, incurred by or asserted against an indemnified party with respect to any item of Equipment or its purchase, acceptance, delivery, ownership, leasing, possession, maintenance, use, operation or transportation, whether or not other parties are involved. The liability of Lessee to make indemnification payments shall, notwithstanding any expiration, cancellation or other termination (whether voluntary, as the result of a default or otherwise) of this Lease Agreement, continue to exist until such indemnity payments are irrevocably made in full by Lessee and received by Lessor. If any claim is made against Lessee or Lessor, the party receiving notice of such claim shall promptly notify the other, but failure of the party receiving notice to so notify the other shall not relieve Lessee of any obligation hereunder.

19. **LANGUAGE.** The parties hereto agree that this document be written in the English language. Les parties aux présentes conviennent à ce que ce document soit rédigé en anglais.

20. **WAIVER.** No covenant or condition of this Lease Agreement can be waived except in writing by Lessor and any forbearance or indulgence by Lessor in any regard whatsoever shall not constitute a waiver of any covenant or conditions to be performed by Lessee to which the same may apply and, until complete performance by Lessee of said covenant or condition, Lessor shall be entitled to invoke any remedy available under this Lease Agreement or by law. No waiver by Lessor of any default shall constitute a waiver of any other default by Lessee or a waiver of Lessor's rights.

21. **CO-LESSEES.** Lessee and the Co-Lessee, if any, hereby agree that their respective liability for the payment and performance of obligations of the Lessee under this Lease Agreement shall be joint and several. Any reference to Lessee in this Lease Agreement shall be deemed to be a reference to the Co-Lessee, in any.

22. **MISCELLANEOUS.** This Lease Agreement shall be governed by the laws of the jurisdiction of which the Equipment was originally delivered to the Lessee. Time is of the essence with respect to this Lease Agreement. This Lease Agreement contains the whole of the agreement between the parties and there are no collateral agreements or conditions whatsoever relating to the Equipment or this Lease Agreement not specifically set forth or referred to herein and no modifications, amendments or variations shall be effective or binding unless agreed to in writing and properly executed by the parties. This Lease Agreement shall be binding upon and inure to the benefit of the parties hereto, their permitted successors and assigns. A facsimile copy of this Lease Agreement with facsimile signature(s) will be treated as an original and will be admissible as evidence of this Lease Agreement. Any provision of this Lease Agreement which is unenforceable in any jurisdiction shall, as to such jurisdiction, be ineffective to the extent of such prohibition or unenforceability without invalidating the remaining provisions hereof and any such prohibition or unenforceability in and jurisdiction shall not invalidate or render unenforceable such provisions in any other jurisdiction. The Lessee acknowledges and agrees that (i) clerical errors shall not affect the validity of this Lease Agreement and Lessor shall be entitled to unilaterally correct the same; and (ii) the Lessor shall be entitled and is hereby authorized to complete the equipment description on the face of this Lease Agreement. Lessor may register a financing statement and Lessee waives the receipt of and the right to receive a copy of any such registered statement or verification statement with respect thereto. To the extent not prohibited by law, Lessee hereby waives the benefit of all provisions of any law, statute or regulation which would in any manner affect Lessor's rights and remedies hereunder, including provisions of the limitations of Civil Rights Act of Saskatchewan.

23. **Vehicle Full Service Agreement as per Schedule "B".**

24. **GUARANTEE AND INDEMNITY.** The undersigned (hereinafter the "Indemnitor"), hereby irrevocably and unconditionally guarantees the Lessor payment of all Lease Payments and promises to satisfy all other obligations arising hereunder this Lease (the "Obligations"), in the event that the Lessee(s) fails to fulfill any its contractual obligations under this Lease. This is an absolute, unconditional, irrevocable and continuing guarantee and indemnity that will remain in full force and effect until all of the Obligations have been indefeasibly satisfied in full, and Lessor has terminated this Guarantee and Indemnity. This Guarantee and Indemnity will not be affected by any surrender, exchange, acceptance, compromise or release by Lessor of any other party, or any other guarantee or any security held by it for any of the Obligations, by any failure of the Lessor to take any steps to perfect or maintain its lien or security interest in or to preserve its rights to any security or other collateral for any of the Obligations, or by any irregularity, unenforceability or invalidity of any of the Obligations or any part thereof or any security or other guarantee thereof. The Indemnitor also hereby waives the benefit of further discussion and division.

Date: August 8, 2023

FOR OFFICE USE ONLY

EXECUTED AS LESSOR:

TPINE LEASING CAPITAL CORPORATION

LESSEE

(Full Legal Name)

2834021 ONTARIO INC.

The undersigned affirms that he/she is duly authorized to execute this Lease.

By

Authorized Signatory

Title

Date 08/08/2023

INDEMNITOR

(Full Legal Name)

CO-LESSEE

(Full Legal Name)

The undersigned affirms that he/she is duly authorized to execute the Certificate

By

By

Authorized Signatory

By

Authorized Signatory

By: BALWANT SINGH SAMRA
Name: BALWANT SINGH SAMRA
Title: _____

*** SCHEDULE "A" ***

To Lease Agreement dated August 8, 2023, between TPine Leasing Capital Corporation and 2834021 ONTARIO INC..

End of Term Options Notwithstanding anything contained in the Lease Agreement to the contrary, so long as no default shall have occurred and be continuing, you shall have the following options at the end of the Initial Term (the "Option Date"):

(a) Purchase all, but not less than all, the Equipment leased pursuant to this Lease Schedule on an "as is, where is" basis, without representation or warranty, express or implied, at a price equal to:

\$10.00

plus any applicable taxes (the "Purchase Price"). After such notice and payment, provided no Default exists, you shall acquire our interest in the Equipment on the Option Date on an "as is, where is" basis without any condition, representation or warranty by us of any kind whatsoever except that you will acquire such interest free and clear of all liens and encumbrances created by or through us; or

["Fair Market Value" shall mean an amount equal to the sales price obtainable in an arms-length transaction between a willing and informed buyer under no compulsion to buy and a willing and informed seller with no compulsion to sell and assuming the Equipment is in the condition required by the Lease.]

(b) Return all but not less than all, the Equipment at your expense to a location in Canada as we designate; or

(c) Continue to lease the Equipment on a month to month basis for the same monthly Lease Payments and on the same terms and conditions of the Lease Agreement.

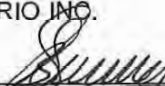
Should you fail to notify us of your election within ninety (90) days of the end of the Initial Term, you shall be deemed to have elected option (c) above, provided however, you shall have the option to purchase all, but not less than all, of the Equipment at any time upon written notice of ninety (90) days to us for the Purchase Price.

IN WITNESS WHEREOF, the parties hereto have caused this Lease Schedule to be duly executed on the date set forth below by their authorized representatives.

TPINE LEASING CAPITAL CORPORATION

2834021 ONTARIO INC.

By: _____
Name: _____
Title: _____

By: 
Name: BALWANT SINGH SAMRA
Title: _____



NO EQUITY LETTER

Date: August 8, 2023

Tpine Leasing Capital Corporation
6050 Dixie Rd
Mississauga, On. L5T 1A6

To whom it may concern

Reg :- Equipment Outlined below ("The Equipment")

New or Used	Model Year	Manufacturer	Model	Description	S No.
				<u>2024 INTERNATIONAL LT 625 RED BEARING S NO. 3HSDZAPR4RN780131</u>	
				<u>2024 INTERNATIONAL LT 625 RED BEARING S NO. 3HSDZAPR6RN780132</u>	

This letter is to confirm that I/we the undersigned have requested TPINE LEASING CAPITAL CORPORATION to purchase the Equipment for the purposes of leasing it to the undersigned.

The undersigned confirms that the deposit and/or equipment trade reflected on the vendor invoice from PRIDE MISSISSAUGA BVC, was made on behalf of TPINE LEASING CAPITAL CORPORATION. The undersigned acknowledges and confirms that regardless of any deposit and/or equipment trade, no interest has been acquired in the Equipment. TPINE LEASING CAPITAL CORPORATION will acquire, beneficially and otherwise absolute right, ownership and interest into the Equipment. The undersigned agrees no interest and/or equity in the Equipment will be claimed, as a result of the deposit and/or equipment trade.

2834021 ONTARIO INC

By 
Name BALWANT SINGH SAMRA
Title _____

BALWANT SINGH SAMRA

By 
Name BALWANT SINGH SAMRA
Title _____

DELIVERY AND ACCEPTANCE CERTIFICATE

DATED: August 10, 2023

2834021 ONTARIO INC.

51 WORCESTER RD

Etobicoke, ON M9W 4K2

Hereinafter called <<Lessee>>

Equipment: 2024 INTERNATIONAL LT 625 RED BEARING S NO. 3HSDZAPR4RN780131
2024 INTERNATIONAL LT 625 RED BEARING S NO. 3HSDZAPR6RN780132

1. The undersigned hereby represents and certifies to Lessor that each item of Equipment specified in the Lease

(A) has been delivered to and inspected by Lessee as of the date hereof;

(B) is satisfactory for financing under the Lease and is unconditionally and irrevocably accepted;

(C) is in good condition and operates properly;

(D) is subject to all of the terms and conditions of the Lease; and


(E) an authorized officer of the undersigned has executed this Acceptance Certificate.

2. This executed Acceptance Certificate constitutes an instruction to Lessor to pay for the Equipment and to commence the Lease and to make all automatic withdrawals provided for in the Lease.

TPINE LEASING CAPITAL CORPORATION

By: _____
Name: _____
Title: _____

2834021 ONTARIO INC.

By: 
Name: BALWANT SINGH SAMRA
Title: _____

GUARANTEE (corporate)

Complete in block letters

1. In consideration of the transactions entered by Tpine Leasing Capital Corporation (hereinafter called Tpine Leasing Capital Corporation) an The Lessee **2834021 ONTARIO INC.** The undersigned (hereinafter called The Guarantor) hereby guarantees Tpine Leasing Capital Corporation unconditionally, jointly and severally with The Lessee the payment of all debts, amounts or obligations, direct or indirect, now owed or that will become owed to Tpine Leasing Capital Corporation by The Lessee or its successors and ensued from the above-mentioned leasing agreement;
2. In all event of execution of the present guarantee, Tpine Leasing Capital Corporation will not have to assert or exhaust its recourses or guarantees against The Lessee or any other person, and The Guarantor shall not assert any right which Tpine Leasing Capital Corporation may or might have against The Lessee or any other person;
3. The present guarantee shall not be diminished or affected in any way because of:
- a) renewal, modification, extension of delay that might be convened between Tpine Leasing Capital Corporation and The Lessee regarding the terms and conditions of the above mentioned Leasing Agreement;
 - b) remittance, total or partial leave of a guarantee;
 - c) renunciation to defaults of The Lessee or any other person;
 - d) release, modification, adjustment or addition regarding any obligation of The Lessee or any other person;
 - e) attribution of the amounts received by Tpine Leasing Capital Corporation from The Lessee or any other person;
 - f) invalidity or non-execution of any writing or commitment by The Lessee or any other person;
 - g) changes in The Lessee's organizational structure or of its managers.
4. The Guarantor expressly relinquishes the privileges of division and discussion and its liability will be paramount, total and absolute without consideration for the liability of The Lessee, of Tpine Leasing Capital Corporation or any other person;
5. The obligations of The Guarantor under the present Guarantee will bind its heirs, testamentary executors, administrators, legal representatives and successors, and any release to any other guarantor shall not relieve The Guarantor from his commitments in accordance with this Guarantee;
6. The Guarantor shall not be released from his commitments in this Guarantee as long as all amounts owed to Tpine Leasing Capital Corporation by The Lessee in accordance with the above mentioned Leasing Agreement, on any grounds in capital, interest, costs and others, are not be paid in full, and, more specifically, The Guarantor who commits as such within the scope of his functions as an administrator, shareholder or spouse will not be released as a result of the end of said functions. The Guarantor recognizes that Tpine Leasing Capital Corporation would not have committed in favour of The Lessee without this Guarantee;
7. The Guarantor elects residence in the judiciary district of Ontario for any and all legal proceedings and tribunal jurisdiction;
8. This Guarantee may be transferred or transported without notice, and the assignee shall possess all its ensued rights as Tpine Leasing Capital Corporation itself.

IN WITNESS THEREOF,

The Guarantor has signed in

Witness Signature

Witness Name (block letters)

Address

Mississauga on this August 8, 2023

WINGS FREIGHTWAY INC.

Guarantor Name

Guarantor Signature

51 Worcester Rd, Etobicoke, ON M9W 4K2


Address

GUARANTEE (corporate)

Complete in block letters

1. In consideration of the transactions entered by Tpine Leasing Capital Corporation (hereinafter called Tpine Leasing Capital Corporation) as The Lessee **2834021 ONTARIO INC.** The undersigned (hereinafter called The Guarantor) hereby guarantees Tpine Leasing Capital Corporation unconditionally, jointly and severally with The Lessee the payment of all debts, amounts or obligations, direct or indirect, now owed or that will become owed to Tpine Leasing Capital Corporation by The Lessee or its successors and ensued from the above-mentioned leasing agreement;
2. In all event of execution of the present guarantee, Tpine Leasing Capital Corporation will not have to assert or exhaust its recourses or guarantees against The Lessee or any other person, and The Guarantor shall not assert any right which Tpine Leasing Capital Corporation may or might have against The Lessee or any other person;
3. The present guarantee shall not be diminished or affected in any way because of:
 - a) renewal, modification, extension or delay that might be convened between Tpine Leasing Capital Corporation and The Lessee regarding the terms and conditions of the above mentioned Leasing Agreement;
 - b) remittance, total or partial leave of a guarantee;
 - c) renunciation to defaults of The Lessee or any other person;
 - d) release, modification, adjustment or addition regarding any obligation of The Lessee or any other person;
 - e) attribution of the amounts received by Tpine Leasing Capital Corporation from The Lessee or any other person;
 - f) invalidity or non-execution of any writing or commitment by The Lessee or any other person;
 - g) changes in The Lessee's organizational structure or of its managers.
4. The Guarantor expressly relinquishes the privileges of division and discussion and its liability will be paramount, total and absolute without consideration for the liability of The Lessee, of Tpine Leasing Capital Corporation or any other person;
5. The obligations of The Guarantor under the present Guarantee will bind its heirs, testamentary executors, administrators, legal representatives and successors, and any release to any other guarantor shall not relieve The Guarantor from his commitments in accordance with this Guarantee;
6. The Guarantor shall not be released from his commitments in this Guarantee as long as all amounts owed to Tpine Leasing Capital Corporation by The Lessee in accordance with the above mentioned Leasing Agreement, on any grounds in capital, interest, costs and others, are not be paid in full, and, more specifically, The Guarantor who commits as such within the scope of his functions as an administrator, shareholder or spouse will not be released as a result of the end of said functions. The Guarantor recognizes that Tpine Leasing Capital Corporation would not have committed in favour of The Lessee without this Guarantee;
7. The Guarantor elects residence in the judiciary district of Ontario for any and all legal proceedings and tribunal jurisdiction;
8. This Guarantee may be transferred or transported without notice, and the assignee shall possess all its ensued rights as Tpine Leasing Capital Corporation itself.

IN WITNESS THEREOF,
The Guarantor has signed in



Witness Signature

Witness Name (block letters)

Address

Mississauga on this August 8, 2023

I-WAY LOGISTICS INC.

Guarantor Name



Guarantor Signature

2792 Slough Street, Mississauga., ON L4T 1G3

Address

GUARANTEE (corporate)

Complete in block letters

1. In consideration of the transactions entered by Tpine Leasing Capital Corporation (hereinafter called Tpine Leasing Capital Corporation) an The Lessee **2834021 ONTARIO INC.** The undersigned (hereinafter called The Guarantor) hereby guarantees Tpine Leasing Capital Corporation unconditionally, jointly and severally with The Lessee the payment of all debts, amounts or obligations, direct or indirect, now owed or that will become owed to Tpine Leasing Capital Corporation by The Lessee or its successors and ensued from the above-mentioned leasing agreement;
2. In all event of execution of the present guarantee, Tpine Leasing Capital Corporation will not have to assert or exhaust its recourses or guarantees against The Lessee or any other person, and The Guarantor shall not assert any right which Tpine Leasing Capital Corporation may or might have against The Lessee or any other person;
3. The present guarantee shall not be diminished or affected in any way because of:
 - a) renewal, modification, extension of delay that might be convened between Tpine Leasing Capital Corporation and The Lessee regarding the terms and conditions of the above mentioned Leasing Agreement;
 - b) remittance, total or partial leave of a guarantee;
 - c) renunciation to defaults of The Lessee or any other person;
 - d) release, modification, adjustment or addition regarding any obligation of The Lessee or any other person;
 - e) attribution of the amounts received by Tpine Leasing Capital Corporation from The Lessee or any other person;
 - f) invalidity or non-execution of any writing or commitment by The Lessee or any other person;
 - g) changes in The Lessee's organizational structure or of its managers.
4. The Guarantor expressly relinquishes the privileges of division and discussion and its liability will be paramount, total and absolute without consideration for the liability of The Lessee, of Tpine Leasing Capital Corporation or any other person;
5. The obligations of The Guarantor under the present Guarantee will bind its heirs, testamentary executors, administrators, legal representatives and successors, and any release to any other guarantor shall not relieve The Guarantor from his commitments in accordance with this Guarantee;
6. The Guarantor shall not be released from his commitments in this Guarantee as long as all amounts owed to Tpine Leasing Capital Corporation by The Lessee in accordance with the above mentioned Leasing Agreement, on any grounds in capital, interest, costs and others, are not be paid in full, and, more specifically, The Guarantor who commits as such within the scope of his functions as an administrator, shareholder or spouse will not be released as a result of the end of said functions. The Guarantor recognizes that Tpine Leasing Capital Corporation would not have committed in favour of The Lessee without this Guarantee;
7. The Guarantor elects residence in the judiciary district of Ontario for any and all legal proceedings and tribunal jurisdiction;
8. This Guarantee may be transferred or transported without notice, and the assignee shall possess all its ensued rights as Tpine Leasing Capital Corporation itself.

IN WITNESS THEREOF,

The Guarantor has signed in

Witness Signature

Witness Name (block letters)

Address

Mississauga on this August 8, 2023

I-WAY TRANSPORT INC

Guarantor Name



Guarantor Signature

51 WORCESTER RD, ETOBICOKE, ON M9W 4K2

Address

APPENDIX “G”



Vishwanths & Kumar Professional Corporation
197 County Court Blvd, Suite 201
Brampton, ON L6W 4P6

T: 905.673.0185
vklawgroup.ca
avn@vklawgroup.ca

July 25, 2025

Via Email

Alvarez & Marsal Canada Inc
1055 Dunsmuir Street Suite 3501
PO Box 49215
Vancouver, BC V7X 1K8

TPine Leasing Capital Corp/TPine Leasing Capital LP c/o Integrated Financial Technologies Inc.
1055 Dunsmuir Street, Suite 3501
Vancouver, BC V7X 1K8

To: IFT Solutions; appointed service provider of Alvarez & Marsal Canada Inc, in its capacity as Court-Appointed Manager over certain property of TPine

Re: Lease Agreement – Loan No. 32719/VIN No. 1UYVS2533N7614314

We act for 2834021 Ontario Inc. and write in response to your correspondence dated July 23, 2025, regarding the above-referenced lease agreement, originally issued by TPine Leasing Capital Corp.

This response is being provided solely in connection with the specific contract and VIN identified in your correspondence. We do not accept this as a global acknowledgment of liability across other contracts or vehicles.

We request that you provide a complete copy of the lease agreement, the assignment of lease, and any security documentation confirming your legal authority to act in this matter. Unless and until such documents are received and reviewed, we do not recognize your standing to make demands or take any enforcement steps. Any unilateral attempt to seize, repossess, or otherwise interfere with our client's equipment while the matter remains under legal review will be treated as improper, without consent, and may trigger immediate legal action including a claim for damages and injunctive relief.

Furthermore, if your organization has issued, or intends to issue, any credit reports concerning this lease or related contracts, you are required to advise us immediately. This matter is now legally disputed. Any negative reporting absent clear disclosure of the ongoing dispute may result in legal consequences, including claims of misrepresentation to third parties.

Our client remains open to good-faith engagement upon receipt of the requested documentation. Any future discussions regarding payment will be strictly conditional upon confirmation of your authority and rectification of prior contractual breaches. Where appropriate, payments may be tendered into trust or under protest to protect our client's legal position.

This letter does not constitute an admission of liability or acknowledgment of any debt. All legal rights and remedies of our client are expressly reserved. Please respond at your earliest convenience so that we may assess next steps accordingly.

Yours sincerely,

Per: VK Law Group
Arjun Vishwanth

*Arjun Vishwanth**

**/s/Signed pursuant to the Electronic Commerce Act.*

C. Client

APPENDIX “H”

Clarkson-Maciel, Matteo

From: Legal <legal@vklawgroup.ca>
Sent: Thursday, August 21, 2025 11:12 AM
To: Clarkson-Maciel, Matteo
Cc: Levine, Natalie; Arjun Vishwanth; Rama V; Rama V
Subject: RE: 2834021 Ontario Inc RE TPine Leasing Capital Corp / TPine Lease Capital LP
Attachments: Pride Contract.pdf; Email.jpg

CAUTION: External Email

Good morning Matteo,

Our client has, at its own expense, located and produced a lease agreement dated March 2, 2022 (attached). The document contains an express obligation under **Section G**, which provides that:

"Truck will be replaced with brand new truck after every 12 months (subject to availability)."

This obligation is central to our client's position. TPine has failed to comply with its replacement obligation, and as a result our client has sustained ongoing operational prejudice and financial harm.

We note that your client, as court-appointed Manager, should already have had these materials in its possession. The fact that it does not, and is relying on our client to locate and produce them, is not our client's burden to correct. Nevertheless, and without prejudice to our rights, we have shared this document to assist in moving matters forward.

Our client expects an immediate resolution of the failure to provide new trucks as required. Unless this issue is substantively addressed, demands for payment of alleged arrears are premature and will be met with corresponding claims and defences.

We reserve all rights, including but not limited to claims in damages and set-off.

Thank you!



Vyshnavie Manmatharajah (Ms.)
Student-at-Law, VK Law Group

Suite 201, 197 County Court Blvd.,
Brampton, ON, L6W 4P6
Phone: 905-673-0185 x 100
Fax: 905-455-4309
avn@vklawgroup.ca

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From: Legal

Sent: Tuesday, August 19, 2025 12:45 PM

To: 'Clarkson-Maciel, Matteo' <mclarksonmaciel@cassels.com>

Cc: Levine, Natalie <nlevine@cassels.com>; Arjun Vishwanth <avn@vklawgroup.ca>; Rama V <rg@vklawgroup.ca>

Subject: RE: 2834021 Ontario Inc RE TPine Leasing Capital Corp / TPine Lease Capital LP

Good afternoon Matteo,

Further to our call, we will provide a further response tomorrow.

Thank you!



Vyshnavie Manmatharajah (Ms.)
Student-at-Law, VK Law Group

Suite 201, 197 County Court Blvd.,
Brampton, ON, L6W 4P6

Phone: 905-673-0185 x 100

Fax: 905-455-4309

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Clarkson-Maciel, Matteo

From: Legal <legal@vklawgroup.ca>
Sent: Tuesday, August 19, 2025 11:51 AM
To: Clarkson-Maciel, Matteo
Cc: Levine, Natalie; Rama V; Arjun Vishwanth; Rama V
Subject: RE: 2834021 Ontario Inc RE TPine Leasing Capital Corp / TPine Lease Capital LP
Attachments: Pride Contract.pdf

CAUTION: External Email

Good afternoon Matteo,

Contrary to your client's assertion that no obligations exist under the lease requiring TPine or its affiliates to act, we draw your attention to **Section G** of the agreement dated March 2, 2022 (a copy of which is attached for ease of reference). That clause expressly provides: *"Truck will be replaced with brand new truck after every 12 months (subject to availability)."*

This contractual provision imposes a **positive obligation** on TPine to provide a new truck to our client annually, save where demonstrable issues of availability arise. Your client's failure to perform under Section G constitutes a breach of its obligations and is central to our client's position.

In light of this express term, it is not open to your client to demand immediate payment of the alleged arrears without first addressing its own default under the lease. Our client reserves all rights, including but not limited to asserting set-off and seeking all appropriate remedies for TPine's breach.

We trust this clarifies the contractual basis for our client's position. Please ensure that this matter is escalated appropriately within Alvarez & Marsal so that a constructive resolution can be pursued.

Thank you!



Vyshnavie Manmatharajah (Ms.)
Student-at-Law, VK Law Group

Suite 201, 197 County Court Blvd.,
Brampton, ON, L6W 4P6
Phone: 905-673-0185 x 100
Fax: 905-455-4309
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From: Clarkson-Maciel, Matteo <mclarksonmaciel@cassels.com>
Sent: Friday, August 15, 2025 4:31 PM
To: Legal <legal@vklawgroup.ca>; Arjun Vishwanth <avn@vklawgroup.ca>
Cc: Levine, Natalie <nlevine@cassels.com>; Rama V <rg@vklawgroup.ca>
Subject: Re: 2834021 Ontario Inc RE TPine Leasing Capital Corp / TPine Lease Capital LP

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Hi Vishnavie,

On our previous correspondence, you assured us that a response would be received no later than today. The Manager wants to be flexible. But it has been over 4 weeks since your initial letter to A&M regarding your clients belief that TPine has not complied with the terms of the leases. The intervening period has largely been the result of delays in hearing from you.

The Manager's view is that, short of your client providing evidence indicating that there are obligations under the lease that require TPine to act, the amounts outstanding from your client should be paid immediately.

The Manager reserves all rights.

Matteo

Cassels | **MATTEO CLARKSON-MACIEL**
Associate
t: +1 416 350 6961
e: mclarksonmaciel@cassels.com

Cassels Brock & Blackwell LLP | cassels.com
Suite 3200, Bay Adelaide Centre – North Tower
40 Temperance St.
Toronto, ON M5H 0B4 Canada
* admitted as a lawyer in Ontario and a solicitor in England & Wales

From: Legal <legal@vklawgroup.ca>
Sent: Friday, August 15, 2025 1:47 PM
To: Clarkson-Maciel, Matteo <mclarksonmaciel@cassels.com>; Arjun Vishwanth <avn@vklawgroup.ca>
Cc: Levine, Natalie <nlevine@cassels.com>; Rama V <rg@vklawgroup.ca>
Subject: RE: 2834021 Ontario Inc RE TPine Leasing Capital Corp / TPine Lease Capital LP

CAUTION: External Email

Good afternoon Matteo,

We will provide a response by mid next week.

Thank you for patience!



Vyshnavie Manmatharajah (Ms.)
Student-at-Law, VK Law Group

Suite 201, 197 County Court Blvd.,
Brampton, ON, L6W 4P6
Phone: 905-673-0185 x 100
Fax: 905-455-4309
avn@vklawgroup.ca

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From: Clarkson-Maciel, Matteo <mclarksonmaciel@cassels.com>

Sent: Friday, August 15, 2025 1:44 PM

To: Legal <legal@vklawgroup.ca>; Arjun Vishwanth <avn@vklawgroup.ca>

Cc: Levine, Natalie <nlevine@cassels.com>

Subject: Re: 2834021 Ontario Inc RE TPine Leasing Capital Corp / TPine Lease Capital LP

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Arjun, following up on this. Please advise on when we can expect your response.

Best

Matteo

Cassels | **MATTEO CLARKSON-MACIEL**
Associate
t: +1 416 350 6961
e: mclarksonmaciel@cassels.com

Cassels Brock & Blackwell LLP | cassels.com

Suite 3200, Bay Adelaide Centre – North Tower

40 Temperance St.

Toronto, ON M5H 0B4 Canada

* admitted as a lawyer in Ontario and a solicitor in England & Wales

From: Clarkson-Maciel, Matteo <mclarksonmaciel@cassels.com>
Sent: Monday, August 11, 2025 12:55 PM
To: Legal <legal@vklawgroup.ca>; Arjun Vishwanth <avn@vklawgroup.ca>
Cc: Levine, Natalie <nlevine@cassels.com>
Subject: Re: 2834021 Ontario Inc RE TPine Leasing Capital Corp / TPine Lease Capital LP

Hello VK team, grateful if you could please revert soonest on the provisions you're relying on under the lease agreements. Thanks!

Matteo

Cassels | **MATTEO CLARKSON-MACIEL**
Associate
t: +1 416 350 6961
e: mclarksonmaciel@cassels.com

Cassels Brock & Blackwell LLP | cassels.com
Suite 3200, Bay Adelaide Centre – North Tower
40 Temperance St.
Toronto, ON M5H 0B4 Canada
* admitted as a lawyer in Ontario and a solicitor in England & Wales

From: Legal <legal@vklawgroup.ca>
Sent: Friday, August 1, 2025 10:00:28 AM
To: Clarkson-Maciel, Matteo <mclarksonmaciel@cassels.com>; Arjun Vishwanth <avn@vklawgroup.ca>
Cc: Levine, Natalie <nlevine@cassels.com>
Subject: RE: 2834021 Ontario Inc RE TPine Leasing Capital Corp / TPine Lease Capital LP

CAUTION: External Email

Good afternoon Matteo,

Mr. Vishwanth is out of office until August 11th. We will provide the below information on or by August 15th.

Thank you!



Vyshnavie Manmatharajah (Ms.)
Student-at-Law, VK Law Group

Suite 201, 197 County Court Blvd.,
Brampton, ON, L6W 4P6
Phone: 905-673-0185 x 100
Fax: 905-455-4309
avn@vklawgroup.ca

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From: Clarkson-Maciel, Matteo <mclarksonmaciel@cassels.com>
Sent: Friday, August 1, 2025 9:54 AM
To: Legal <legal@vklawgroup.ca>; Arjun Vishwanth <avn@vklawgroup.ca>
Cc: Levine, Natalie <nlevine@cassels.com>
Subject: RE: 2834021 Ontario Inc RE TPine Leasing Capital Corp / TPine Lease Capital LP

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Hi Arjun,

Just checking in to see when we can expect you will share detail on the provisions in the lease your client relies on to allege that A&M must perform certain maintenance and exchange obligations.

Thanks!

Matteo

Cassels | **MATTEO CLARKSON-MACIEL**
Associate
t: +1 416 350 6961
e: mclarksonmaciel@cassels.com

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Suite 3200, Bay Adelaide Centre – North Tower
40 Temperance St.
Toronto, ON M5H 0B4 Canada
* admitted as a lawyer in Ontario and a solicitor in England & Wales

From: Legal <legal@vklawgroup.ca>
Sent: Friday, July 25, 2025 1:35 PM
To: Clarkson-Maciel, Matteo <mclarksonmaciel@cassels.com>
Cc: Levine, Natalie <nlevine@cassels.com>; Arjun Vishwanth <avn@vklawgroup.ca>
Subject: RE: 2834021 Ontario Inc RE TPine Leasing Capital Corp / TPine Lease Capital LP

CAUTION: External Email

Good afternoon Matteo,

Please provide your availability for a call next week.

Thank you!



Vyshnavie Manmatharajah (Ms.)
Student-at-Law, VK Law Group

**Suite 201, 197 County Court Blvd.,
Brampton, ON, L6W 4P6**

Phone: 905-673-0185 x 100
Fax: 905-455-4309
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From: Clarkson-Maciel, Matteo <mclarksonmaciel@cassels.com>

Sent: Friday, July 25, 2025 12:37 PM

To: Legal <legal@vklawgroup.ca>; Arjun Vishwanth <avn@vklawgroup.ca>

Cc: Levine, Natalie <nlevine@cassels.com>

Subject: RE: 2834021 Ontario Inc RE TPine Leasing Capital Corp / TPine Lease Capital LP

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Hello Vishnavie and Arjun,

Hope this email finds you well.

We act for Alvarez & Marsal Canada Inc. in its capacity as Court-appointed manager of certain property of the Pride Group, pursuant to an order of the Ontario Superior Court of Justice (Commercial List) in the matter of the *Companies' Creditor Arrangement Act* and Pride Group Holdings Inc. et al.

Our client shared with us the correspondence attached below and those sent by you on behalf of Wings Freightway Inc. and I-Way Transport Inc.. I tried to ring you earlier today regarding your correspondence, but I was unable to leave you a voice message on your system and was unable to connect to your direct lines or reception.

If you could please call me back at the number below at your soonest convenience, I'd be happy to discuss the content of your letters. Looking forward to working with you.

Best,

Matteo

Cassels

MATTEO CLARKSON-MACIEL

Associate

t: +1 416 350 6961

e: mclarksonmaciel@cassels.com

Cassels Brock & Blackwell LLP | cassels.com

Suite 3200, Bay Adelaide Centre – North Tower

40 Temperance St.

Toronto, ON M5H 0B4 Canada

* admitted as a lawyer in Ontario and a solicitor in England & Wales

From: Legal <legal@vklawgroup.ca>

Sent: Friday, July 25, 2025 11:13 AM

To: ampaymentservices@iftsolutions.com; TPine Leasing Payment Services <tpinepaymentservices@iftsolutions.com>; tlcc@acct-admin.com; McIntosh, Doug <dmcintosh@alvarezandmarsal.com>; Allin, Elese <eallin@alvarezandmarsal.com>; Mann, Esther <esther.mann@alvarezandmarsal.com>
Cc: Arjun Vishwanth <avn@vklawgroup.ca>
Subject: 2834021 Ontario Inc RE TPine Leasing Capital Corp / TPine Lease Capital LP

! [EXTERNAL EMAIL]: Use Caution

Good morning,

Please see attached correspondence from Mr. Vishwanth that requires your immediate attention.

Thank you!



Vyshnavie Manmatharajah (Ms.)
Student-at-Law, VK Law Group

Suite 201, 197 County Court Blvd.,
Brampton, ON, L6W 4P6
Phone: 905-673-0185 x 100
Fax: 905-455-4309
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PRIDE

FLEET SOLUTIONS

Date MARCH 02, 2022

Monthly Payment \$5590/per month/per truck (Including GAP)

Mileage Allowance Annual 250,000 Miles per year (Miles will be consolidated with batch)

Additional Rental per Mile \$0.25

Maintenance by **Pride**

Wear and tear by **Pride**

Any driver abuse responsibility Client

A. Pride Fleet Solutions Inc has the right to replace/ exchange the equipment with a similar unit with 30-day notice. BS.

B. Customer is not permitted to make any modification to the vehicle without written permission of Pride Fleet Solutions Inc. BS.

C. Customer is responsible for removing of decals and detailing while returning the vehicle after lease term. Any physical damage exceeding \$500 will be customer's responsibility. BS.

D. Client is responsible to keep the record of maintenance. If the warranty is declined due to this reason, client is liable to make the payment. BS

E. Pride Fleet Solutions Inc will be responsible for annual safety only (Once a year). Any other semi-Annual inspections will be covered by Customer. BS

F. Any repair done outside (other then pride service station) should be authorized by Pride Fleet Solutions Inc BS

G. Truck will be replaced with brand new truck after every 12 months. (Subject to Availability) BS

H. It is replacement for vin MW5528.

6050 Dixie Rd, Mississauga, ON, L5T 1A6

Tel. 416-913-9602, Fax. 1 866-865-4596, email: credit@tpinecapital.com

PRIDE

FLEET SOLUTIONS

Please Note – All the amounts are applicable to taxes

Vehicle Description

2022 VOLVO 760

S.NO. 4V4NC9EH6NN320387

Pride Fleet Solutions Inc

2834021 ONTARIO INC.

By _____
Name:

By  _____
NAME BALWANT SINGH SAMRA

6050 Dixie Rd, Mississauga, ON, L5T 1A6

Tel. 416-913-9602, Fax. 1 866-865-4596, email: credit@tpinecapital.com

Re: Lease Agreement - TPINE leasing

3 messages

Balwant Samra <bsamra@i-waytrans.com>

Thu, Feb 20, 2020 at 12:26 PM

To: Dhanbir Jaswal <djaswal@jaswallaw.com>, preet@pridegroupenterprises.com

Cc: Avii Samra <Asamra@i-waytrans.com>, balvir singh <BSAMRA3@gmail.com>

Hi Preet

As we discussed on the phone following(see preceding email) are concerns raised by our lawyer

according to our, discussion we agree to the following conditions

1. All maintenance is covered by them(including tire oil change and on-road (except Driver mistake like hit somewhere, driver negligence)
2. If equipment can not be fixed in 72 hrs then they will provide another truck
3. Towing covered when a truck mechanical problem occurs
4. We can change the track with a 2-week notice on our discretion
5. We will get a new truck replacement every year
6. after 4 yr we can continue using and we will have no penalty to stop after 4 yr
7. 20% fleet can be increased or decreased without any extra charges/ penalties
8. The lease price for all 4 yrs will be fixed, and will not change (especially increase) , due to CPI

He gave us 2 options

option 1

Change this existing lease agreement with point our lawyer raised and add above 8 conditions

option 2

make another schedule from Tpine leasing(both documents must be from same company either (Tpine or Pride), where that schedule will have priority our existing on contradicting points and will have above 8 conditions added

Regards

Thank you

Balwant Samra

Managing Director

I-Way Transport Inc.

Phone: 647-660-4929 ext 104

Fax: 289-201-2338



APPENDIX “I”



Vishwanths & Kumar Professional Corporation
197 County Court Blvd, Suite 201
Brampton, ON L6W 4P6

T: 905.673.0185
vklawgroup.ca
avn@vklawgroup.ca

September 24, 2025

Via Email

Alvarez & Marsal Canada Inc., in its capacity as Court-Appointed Manager over certain property of TPine Leasing Capital Corp. and/or affiliates
1055 Dunsmuir Street, Suite 3501, P.O. Box 49215
Vancouver, BC V7X 1K8

and

TPine Leasing Capital Corp. / TPine Leasing Capital LP
c/o Integrated Financial Technologies Inc.
1055 Dunsmuir Street, Suite 3501
Vancouver, BC V7X 1K8

CC (for notice only):

City Collections & Bailiff Service Inc.
1110 Henderson Highway
Winnipeg, MB R2G 1L1

and

Trend Collection and Bailiff Services Ltd.
Unit 216 – 740 Rosser Avenue
Brandon, MB R7A 0K9

Unit 720 – 305 Broadway Avenue
Winnipeg, MB R3C 3J7

Re: I-Way Transport Inc., Wings Freightway Inc., and 2834021 Ontario Inc. – Urgent Standstill Required

We act for I-Way Transport Inc., Wings Freightway Inc., and 2834021 Ontario Inc. This letter is issued with full reservation of our clients' rights. Our clients' position is grounded in the following chronology and issues, previously raised with your office through and with counsel and reproduced here to maintain a clear record.

We note receipt of payment-redirection instructions and certain assignment materials. Notwithstanding this, your office has directed our clients to remit payments "under the lease" as if the Pride Group lease(s) had been duly assigned or adopted, while declining to recognize or

address the corresponding obligations, representations, credits, offsets, service commitments, and defect/remedy frameworks under those same leases, despite our identification of material breaches. In effect, the lease(s) are invoked for payment while the obligations and defaults remain unaddressed. Enforcement measures, including the engagement of bailiffs were commenced while counsel-to-counsel correspondence was still ongoing. We therefore seek a clear position as to whether you are adopting the lease(s) with the corresponding obligations within the lease. As a result, we renew our request for strict proof of (i) the legal basis and mechanism for any post-appointment adoption or assignment (and the scope of the Manager's mandate to enforce lease terms), (ii) the chain of title and continuity/perfection of any security interests relied upon, and (iii) complete, reconciled statements of account substantiating the amounts demanded. Those requests remain outstanding, and we ask that a standstill on enforcement be directed pending clarification.

Following receipt of your direction letters instructing payments to the Manager or its agent, we contacted the Manager's counsel. In those discussions, we addressed the appearance of an apparent bifurcation on your side between (a) a demand for continuing lease performance and (b) a denial of liability or responsibility for undertakings under the lease. No complete authority package has been provided; no adequate reconciliation has been furnished; and your position on lease adoption versus mere asset/interest enforcement remains unclear, notwithstanding our efforts to resolve these issues without litigation. By contrast, where other lenders approached our clients directly in unrelated files, proper assignment documentation was provided and accepted, and accounts were cleared; the present files do not reflect that standard.

Against that background, our clients advise that on or about 23 September 2025 a unit was removed in Winnipeg without production of any court order or identification. The Bailiff's conducted was aggressive and appeared to be motivated to create disruption of our client's operation. Bailiffs have attended at open yards without providing authority packages or leaving copies of documentation; and that certain units may have already been consigned or directed toward auction facilities. We have also been contacted by third parties indicating continued attempts to locate and remove additional units. Our clients have sought to engage with the Manager's office through and with counsel to establish an orderly process, including discussion of an orderly transition of equipment if required, but those attempts have not resulted in the provision of authority or a resolution pathway. Any further entry upon our clients' premises, seizure, relocation, auction, or disposition of equipment absent prior production of valid authority and counsel-to-counsel arrangements is objected to and must cease forthwith. No consent is given or may be inferred.

To deal with this situation in a non disruptive meaningful manner, please provide us with complete executed leases with all schedules, amendments, and ancillary agreements for each file; executed assignments of lease and any PPSA or other security assignments relied upon together with evidence of perfection and continuity; the court order(s) appointing Alvarez & Marsal as manager and any directions, variations, or authorizations relied upon for enforcement; written

agency/appointment instruments for Integrated Financial Technologies Inc. and any bailiff or tow contractors; reconciled statements of account for each file itemizing charges, credits, arrears, cure amounts, termination/payout figures and per-diem with an audit trail; and complete notice and demand histories issued to our clients. Unless and until the foregoing is produced and verified, you have not established any entitlement to pursue enforcement steps against our clients, particularly where your demands rest on lease adoption while lease obligations remain unaddressed.

Site access must be arranged through counsel by appointment only. Unscheduled attendance will be treated as trespass, and where appropriate a trespass notice will be issued to. This is without prejudice to all remedies in respect of prior entries or removals.

Our clients remain prepared to discuss an orderly, scheduled transition of equipment that mitigates operational disruption while preserving all rights and claims; any monetary discussion, if pursued at all, will follow complete documentary production as above and may proceed only on a trust or protest basis. Pending that review, please suspend self-help and negative credit reporting in relation to these disputed files and advise forthwith if any adverse steps have been taken such that we may take steps to address them. Nothing herein constitutes an admission, waiver, or election of remedies.

Kindly acknowledge receipt and provide the above-noted documentation and confirmations within a reasonable time frame. Failing a satisfactory response, we are instructed to seek appropriate reliefs and damages against such parties as may be advised, including relief addressed to the Manager's asserted lease-based demands while lease obligations remain unremedied. Please ensure that all recovery agents and tow contractors engaged by you are apprised of this notice; we have copied City Collections & Bailiff Service Inc. and Trend Collection and Bailiff Services Ltd. for notice purposes.

Yours sincerely,

Per: VK Law Group
Arjun Vishwanth

*Arjun Vishwanth**

**/s/Signed pursuant to the Electronic Commerce Act.*



September 26, 2025

Via E-Mail

Vishwanths & Kumar Professional Corporation
197 Country Court Blvd, Suite 201
Brampton, ON L6W 4P6

cpendrith@cassels.com
tel: +1 416 860 6765
file # 059366-00005

Attn: Arjun Vishwanth

Dear Mr Vishwanth:

Re: Your Letter dated September 24, 2025 re: I-Way Transport Inc., Wings Freightway Inc., and 2834021 Ontario Inc. — Urgent Standstill Required

We are litigation counsel to Alvarez & Marsal Canada Inc., in its capacity as Court-Appointed Manager over property of the Pride Group Holdings Inc. et al.

We are in receipt of your letter dated September 24, 2025.

We are in the process of bringing a motion before the Ontario Superior Court of Justice (Commercial List) in the proceedings of Pride Group Holdings Inc. et al under the *Companies' Creditors Arrangement Act*.

Our client's motion will seek relief directing your clients to facilitate repossession of the vehicles leased to them (consistent with our client's rights under the existing agreements and prior court orders) and inform the Court that we will separately commence an action on the Commercial List to recover amounts owing under the leases. We will be seeking our client's costs.

This motion should not be necessary. Unfortunately, it is required due to your clients' unlawful interference with our client's right to recover the leased vehicles, which arises due to your clients' refusal to pay the amounts owing to our client under the leases.

Should your clients wish to avoid this motion, we require your confirmation, no later than Tuesday September 30, 2025, that your clients will fully cooperate with ours to facilitate the orderly transfer of the vehicles without attempt to restrict our client's contractual rights.

If that is not agreeable, you may respond to our client's motion at the relevant time. We expect the motion materials will be ready soon.

We look forward to hearing from you.

Yours truly,

Cassels Brock & Blackwell LLP

A handwritten signature in dark ink, appearing to be 'CP' with a stylized flourish.

Colin Pendrith
Partner
Services provided through a professional corporation

CP

LEGAL*69582502.4



September 30, 2025

Via Email

Cassels Brock & Blackwell LLP

Suite 3200, Bay Adelaide Centre – North Tower
40 Temperance Street
Toronto, ON M5H 0B4

Attn: Colin Pendrith

Re: I-Way Transport Inc., Wings Freightway Inc., and 2834021 Ontario Inc. – Orderly Repossession Protocol and Authority Package

Dear Mr. Pendrith,

Re: I-Way Transport Inc., Wings Freightway Inc., and 2834021 Ontario Inc. – Response to your September 26, 2025, letter; orderly transition and preservation of rights

We acknowledge receipt of your correspondence dated September 26, 2025. Our clients categorically deny any “unlawful interference.” To the contrary, our clients have consistently sought an orderly, safe, and document-driven approach and have asked for basic particulars necessary to avoid mis delivery, business disruption, and public-safety risk.

Your letter proceeds on the premise that there is a single operative lease form and that any other lease version or collateral obligations are irrelevant. That premise is disputed. Our clients’ position, previously conveyed, is that the lease relied upon by your office does not capture the obligations actually extended to and relied upon by our clients, including promised neutral-maintenance, delivery of new equipment every year and related obligations, the non-performance of which has directly resulted in damages. The Manager, as alleged assignee, is refusing to acknowledge the non-performed obligations. Our clients expressly preserve all legal and equitable rights, including set-off and counterclaim for consequential loss occasioned by the non-performance of obligations tied to the equipment.

Against that reservation of rights, and without prejudice to liability or quantum, our clients are prepared to facilitate an orderly transition of the trucks that are the subject of your client’s asserted rights under its assignments. To eliminate operational chaos of repos and protect cargo, third parties, and roadway users, we propose the following procedure, which is reasonable in the circumstances and capable of implementation within fourteen (14) days of your confirmation:

1. Standstill and safety. Your client will immediately instruct all bailiffs and agents to stand down from any unilateral attendance, seizure, or attempted removal. No party will attend at our clients' yards or right-of-way without written coordination through counsel. Cargo-bearing assets will not be touched until unloaded by our clients to avoid spoliation, contamination, or chain-of-custody issues.
2. Identification and authority: Within two business days, you will provide: (a) a consolidated schedule of the specific VINs/serial numbers your client claims, the corresponding lease numbers, and the full chain of assignment for each; and (b) copies of the court orders you say authorize recovery, together with proof of your client's current insurance and the authority of any retrieval contractor.
3. Staging and delivery window: Within fourteen (14) days of your written confirmation, our clients will have the identified trucks, unloaded and free of third-party cargo, at designated yards to be specified in a coordinated schedule. Your client will then collect using insured bailiffs and operators.
4. Mutual release option: If your client wishes to resolve globally, our clients are prepared to consider a mutual release upon completion of the orderly return and reconciliation of accounts. Failing agreement on a release, the parties will proceed with their respective claims and defences in the proper forum, with equipment issues separated from liability and damages adjudication.

For clarity, some trailers and other equipment at issue are the subject of distinct counterparties and legal relationships handled by other counsel. Our clients will not consent to any commingling of assets or rights belonging to or claimed by those third parties. Your client's retrieval efforts must be limited to assets properly identified in the authoritative schedule to be supplied under item 2 above. Any attempt to remove loaded units or equipment claimed under a different chain of title will be opposed.

Your letter suggests an imminent motion. If your client elects to bring it notwithstanding the above cooperative protocol, our clients will respond and seek directions, including on process and safety. However, we trust the Court will expect the parties to adopt a measured, risk-reducing transition such as the one proposed. The Manager's earlier resort to bailiff attendances while counsel was engaged in coordination discussions was counter-productive and increased risk; we ask that this not be repeated.

Please confirm in short order that your client accepts the foregoing fourteen-day orderly transition protocol, will deliver the requested particulars and orders within five business days,

and will withhold any enforcement activity pending implementation. Upon your confirmation, we will circulate a draft coordination schedule and single points of contact for logistics.

All of our clients' rights are reserved.

Yours sincerely,

Per: VK Law Group

Arjun Vishwanth

*Arjun Vishwanth**

**/s/Signed pursuant to the Electronic Commerce Act.*



October 2, 2025

Via E-Mail

Vishwanths & Kumar Professional Corporation
197 Country Court Blvd, Suite 201
Brampton, ON L6W 4P6

cpendrith@cassels.com
tel: +1 416 860 6765
file # 059366-00005

Attention: Arjun Vishwanth

Dear Mr Vishwanth:

Re: Your Letter dated September 30, 2025 re: I-Way Transport Inc., Wings Freightway Inc., and 2834021 Ontario Inc. – Orderly Repossession Protocol and Authority Package

We are in receipt of your letter dated September 30, 2025.

We attach:

- (1) The Second Amended Syndicate Collateral Management Order dated February 4, 2025 (the “**Collateral Management Order**”) providing the Manager with authority to enforce any lease or security held by any Pride Entity (as defined therein); and
- (2) A list of Management Property VINs in your client's possession. This list itemises each lease number.

We note that items (1) and (2) were previously provided to you by us on August 26, 2025. The Collateral Management Order and all related documents are also available on the monitor's website at: <https://documentcentre.ey.com/#/detail-engmt?eid=589>.

The Manager is willing to work with your client for an orderly turn-over of the vehicles, provided that your client makes the VINs available for turn-over no later than October 9, 2025. For the avoidance of doubt, the Manager is not waiving any rights under the lease agreements, including any rights to collect arrears, the amounts owing to the end of the relevant lease, or any other amounts.

If your client does not fully comply with above stated timeline or is anything less than fully cooperative, our instructions are to proceed with the Manager's motion to the Court seeking an order requiring the vehicles be turned over immediately.

All the Manager's rights are fully reserved.

Yours truly,

Cassels Brock & Blackwell LLP

A handwritten signature in black ink, appearing to read 'CP', is positioned above the printed name and title of the signatory.

Colin Pendrith
Partner
Services provided through a professional corporation

CP
Attachments

LEGAL*69634182.4



Court File No. CV-24-00717340-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

THE HONOURABLE

)

TUESDAY, THE 4TH

JUSTICE OSBORNE

)

)

DAY OF FEBRUARY, 2025

IN THE MATTER OF THE *COMPANIES' CREDITORS*
ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF PRIDE GROUP HOLDINGS INC. and
those Applicants listed on **Schedule "A"** hereto (each, an
"**Applicant**", and collectively, the "**Applicants**")

**SECOND AMENDED SYNDICATE COLLATERAL MANAGEMENT
ORDER**

THIS MOTION made by Alvarez & Marsal Canada Inc., in its capacity as Court-appointed Manager (the "**Manager**") was heard this day at 330 University Avenue, Toronto, Ontario.

ON READING the Motion of the Manager dated January 30, 2025 for certain amendments to the Amended Syndicate Collateral Management Order dated November 1, 2024, the Motion of Royal Bank of Canada in its capacity as Bilateral Lender ("**RBC Bilat**") dated October 31, 2024 for certain amendments to the Syndicate Collateral Management Order dated October 17, 2024, the Motion Record of Royal Bank of Canada in its capacity as administrative agent (the "**Administrative Agent**") for and on behalf of itself and the other lenders (the "**Syndicate Lenders**") party to the Fourth Amended and Restated Credit Agreement dated as of May 10, 2024 among, *inter alia*, the Administrative Agent, the Syndicate Lenders and the Applicants and the limited partnerships listed in Schedule "A" hereto (collectively the "**Pride Entities**" and each, a "**Pride Entity**") for an Order pursuant to Section 11 of the *Companies' Creditors Arrangement Act* appointing Alvarez & Marsal Canada Inc. as manager without security, of the Management

Property (as defined below), the affidavits of Brad D. Newton sworn August 2, 2024 and October 16, 2024 and the Exhibits thereto, and on hearing the submissions of counsel for the Manager, the Syndicate Lenders, the Pride Entities, the Monitor, and such other parties listed on the Participant Information Form, no one else appearing although duly served as appears from the affidavit of service of Eva-Louise A. A. Hyderman, sworn January 30, 2025 and on reading the consent of Alvarez & Marsal Canada Inc. to act as the Manager,

SERVICE

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

2. THIS COURT ORDERS that capitalized terms used and not defined in this Order shall have the meaning given to them in the Second Amended and Restated Initial Order of this Court dated May 6, 2024 in these proceedings (the “**Initial Order**”), the Order (re: Turn-Over of Securitized Assets) of this Court dated August 8, 2024 in these proceedings (the “**Securitized Asset Turn-Over Order**”), or the Order (re Wind-Down, Liquidity Contribution Alternative and Turn-Over) of this Court dated October 10, 2024 in these proceedings (the “**Recourse Lender Turn-Over Order**”), as applicable.

APPOINTMENT

3. THIS COURT ORDERS that, pursuant to section 11 of the CCAA, Alvarez & Marsal Canada Inc. is hereby appointed Manager, as an officer of this Court, without security, of the following assets, undertakings, and properties (collectively, the “**Management Property**”) of the Pride Entities and all proceeds thereof:

- (a) all Remaining Assets to be turned-over to the Syndicate Lenders upon payment by the Syndicate Lenders of their Liquidity Contribution pursuant to the Recourse Lender Turn-Over Order (the “**Immediate Turn-Over Assets**”);

- (b) such further Remaining Assets and any other assets or interests (regardless of whether such asset or interest is titled to a Pride Entity) as may be turned-over to the Syndicate Lenders (or to the Manager as designee of the Syndicate Lenders) from time to time pursuant to the Recourse Lender Turn-Over Order (including any MCV Turn-Over Resolution), Securitized Asset Turn-Over Order (including any MCV Servicing Agreement), Entitlement Claims Process Order, or other order of the Court (the “**Additional Assets**”), which Additional Assets and Immediate Turn-Over Assets are identified by vehicle identification number (“**VIN**”) on Schedule “B” hereto and which may be supplemented from time to time, in which case an updated Schedule “B” to this Order shall be posted on the Monitor’s Website;
- (c) the Remaining Assets (the “**RBC Bilat Assets**”) to be turned-over to RBC Bilat upon payment by RBC Bilat of its Liquidity Contribution pursuant to the Recourse Lender Turn-Over Order, which RBC Bilat Assets are identified by VIN in Schedule “D” to this Order; and
- (d) with the consent of the Manager and the Administrative Agent, such further assets or interests (regardless of whether such asset or interest is titled to a Pride Entity) as may be turned-over to RBC Bilat (or to the Manager as designee of RBC Bilat) from time to time pursuant to the Recourse Lender Turn-Over Order (including any MCV Turn-Over Resolution), Securitized Asset Turn-Over Order (including any MCV Servicing Agreement), Entitlement Claims Process Order, or other order of the Court, and in such case, an updated Schedule “D” to this Order shall be posted on the Monitor’s Website.

4. THIS COURT ORDERS that in the event of a conflict between the terms of this Order and the Initial Order, this Order shall govern. In the event of a conflict between the terms of this Order and the Recourse Lender Turn-Over Order, the Recourse Lender Turn-Over Order shall govern,

and this Order is expressly subject to the terms and conditions (including in respect of turn-over of Management Property) as set out in the Recourse Lender Turn-Over Order.

MANAGER'S POWERS

5. THIS COURT ORDERS that, the Manager is hereby empowered and authorized, but not obligated, to act at once in respect of the Management Property and, without in any way limiting the generality of the foregoing, the Manager is hereby expressly empowered and authorized to do any of the following where the Manager considers it necessary or desirable, in each case, with the cost and expense thereof to be paid from the proceeds of Management Property or the Manager's borrowings in accordance with this Order (and such costs and expenses shall not be borne by the Pride Entities):

- (a) to take possession of and exercise control over the Management Property and any and all proceeds, receipts and disbursements arising out of or from the Management Property;
- (b) to receive, preserve, and protect the Management Property, or any part or parts thereof, including, but not limited to, the relocating of Management Property to safeguard it, the engaging of independent security personnel, the taking of physical inventories and the placement of such insurance coverage;
- (c) to engage consultants, servicers, appraisers, brokers, consignees, agents, experts, auditors, accountants, managers, counsel and such other persons from time to time and on whatever basis, including on a temporary basis, to assist with the exercise of the Manager's powers and duties in respect of the Management Property, including without limitation those conferred by this Order;
- (d) to engage with the Ministry of Transportation, Service Ontario, and/or any other governmental department, ministry or agency responsible for vehicle title and/or registration in Canada or the United States of America;

- (e) to purchase or lease such machinery, equipment, supplies, premises or other assets to carry out the Manager's powers and duties in respect of the Management Property, including those conferred by this Order;
- (f) to receive and collect all monies and accounts now owed or hereafter owing to any of the Pride Entities under or in connection with the Management Property and to exercise all remedies of any Pride Entity in collecting such monies, including, without limitation, to enforce any leases and security held by any Pride Entity in or constituting Management Property;
- (g) to settle, extend or compromise any indebtedness owing to any Pride Entity solely to the extent directly related to the Management Property, including in connection with the termination and/or buy-out of vehicle, trailer or equipment leases included in the Management Property;
- (h) to execute, assign, issue and endorse documents of whatever nature in respect of titling to any of the Management Property, whether in the Manager's name or in the name and on behalf of any Pride Entity, for any purpose pursuant to this Order;
- (i) to initiate, prosecute and continue the prosecution of any and all proceedings or disputes and to defend all proceedings now pending or hereafter instituted with respect to the Management Property or the Manager, and to settle or compromise any disputes or any other proceedings in respect thereto. The authority hereby conveyed shall extend to such appeals or applications for judicial review in respect of any order or judgment pronounced in any such proceeding;
- (j) to market any or all of the Management Property, including advertising and soliciting offers in respect of the Management Property or any part or parts thereof and negotiating such terms and conditions of sale as the Manager in its discretion may deem appropriate;