

**SENT BY EMAIL**

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Dear Counsel:

**RE: CV-24-00717340-00CL – In The Matter of a Plan of Compromise or Arrangement of  
Pride Group Holdings Inc. – Motion Returnable January 13, 2026**

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As you know, we act for a group of 28 freight companies who entered into rental agreements for certain vehicles from Pride Fleet Solutions Inc. (the “**PFS Leases**”). As you also know, these freight companies maintain that at the time they sought to rent the vehicles, they were also asked to sign conflicting lease agreements for the same vehicle with another company, TPine Leasing Capital Corporation (the “**TLCC Leases**”). The terms of the TLCC Leases were far more onerous than the PFS Leases. Our clients were consistently told that the TLCC Leases were for “internal purposes” only, and the PFS Leases were the ones that were in fact performed and honoured.

Our current mandate from our clients is to seek an order to be appointed as representative counsel for all similarly situated freight companies who held conflicting lease agreements with both PFS and TLCC (the “**Freight Companies**”), so that the enforceability of leases with TLCC can be challenged, among other things. We served a Notice of Motion on October 8, 2025, and our motion Record was served on December 17, 2025. We proposed a case management conference to timetable that motion for January 12, 2026, but received limited responses from interested parties.

We are now writing further to Mr. Kukulowicz’s recent email of January 4, 2026. In that email, Mr. Kukulowicz advised that the Receiver (BDO Canada Limited) and Manager (Alvarez and Marsal Canada Inc.) would be seeking an order for the approval of a “Collection Plan” process for the Freight Companies, seeking to enforce the TLCC Leases. You indicated that the motion is returnable January 13.

It is our clients’ position that the motion to appoint representative counsel must be addressed first.

Firstly, we do not know whether any of the Freight Companies, or any of the others who would be subject to the proposed claims process, have been served with the motion. They are entitled to be properly served.

Secondly, the appointment of representative counsel will facilitate a more efficient management of the claims, as there will almost certainly be issues common to the Freight Companies' cases that can be dealt with on a consolidated basis, rather than necessitating the same issues to be separately argued.

We also have issues with some of the individual terms of the collection plan, though as we do not have a mandate to act as representative counsel, we are not in a position to take positions on behalf of all of the Freight Companies.

Bypassing the motion to appoint representative counsel for the Freight Companies will have the effect of fragmenting the group, composed widely of family-owned businesses, and diluting their ability to defend themselves. This is important where the amounts sought under the TLCC Leases could seriously damage not only the Freight Companies, but also the owners who may be subject to personal guarantees.

We propose that the January 13<sup>th</sup> motion date should be used as a case conference to determine and schedule the best procedure for having these issues adjudicated, with representative counsel in place. At a high level, we believe the following procedure would be appropriate:

- 1) The motion to appoint representative counsel should be heard;
- 2) If representative counsel is appointed, a motion should be held to determine any issues which can be heard on a consolidated basis; and
- 3) If further adjudication is required following step 2, then a claims process should proceed for any remaining issues.

We are open to discussing scheduling and procedures for the steps that should be taken to have these issues adjudicated fairly and efficiently.

Please ensure that our office and Mr. Weisz and Ms. Lallani are served with any materials that you intend to put before the court on January 13. We also ask that you add us to the Case Center bundle.

Yours very truly,

David M. Trafford

CC: Adam Beyhum, Steven Weisz, Dilina Lallani (co-counsel for the Freight Companies)  
Natalie E. Levine, Eva-Lousa A. Hyderman (co-counsel for the Manager)  
Shawn Irving, Ben Muller (co-counsel for the Receiver)