

**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 1001387025 ONTARIO INC.**

Applicants

**AIDE MEMOIRE OF QM GP Inc.
(RE: May 27, 2026 Hearing)**

May 26, 2026

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TO: THE SERVICE LIST

1. This hearing was originally scheduled for a 2-hour motion made by 2386843 Ontario Inc. o/a Phantom Disposal (“**Phantom**”).
2. QM GP Inc. (“**QM**”), which was an initial Applicant in these proceedings and emerged as a restructured company pursuant to this Court’s Approval and Reverse Vesting Order dated October, 24, 2025, opposes some of the relief sought in Phantom’s motion.
3. Due to unforeseen circumstances, counsel for Phantom advised that they were unable to deliver its motion factum by the deadline agreed to by the parties and has asked that the motion be rescheduled. QM accepts that explanation and agrees to a new date that is convenient to the parties, if acceptable to the Court.
4. While the parties have attempted to confer on resolving issues, that has not been successful yet. QM accordingly objects to any order being made on Phantom’s motion now. Counsel for QM and Phantom have agreed to further attempt to narrow or resolve issues in parallel with proceeding to a new hearing date.
5. QM accordingly submits that, subject to the Court’s direction, this hearing is now for procedural purposes to confirm the adjournment and reschedule Phantom’s motion to a later date.

ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS 26th DAY OF MAY, 2026

RECONSTRUCT LLP

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Court File No. CV-25-00748510-00CL

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF 1001387025 ONTARIO INC.**

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Proceedings commenced at Toronto

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