

**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
1242939 B.C. UNLIMITED LIABILITY COMPANY, 1241423 B.C. LTD., 1330096 B.C. LTD.,
1330094 B.C. LTD., 1330092 B.C. UNLIMITED LIABILITY COMPANY, 1329608 B.C.
UNLIMITED LIABILITY COMPANY, 2745263 ONTARIO INC., 2745270 ONTARIO INC.,
SNOSPMIS LIMITED, 2472596 ONTARIO INC., AND 2472598 ONTARIO INC.**

Applicants

**AIDE MEMOIRE OF THE APPLICANTS
(Re: Request for Accommodations)**

March 23, 2026

Stikeman Elliott LLP
Barristers & Solicitors
5300 Commerce Court West
199 Bay Street
Toronto, Canada M5L 1B9

Ashley Taylor LSO#: 39932E
Email: ataylor@stikeman.com
Tel: +1 416-869-5236

Elizabeth Pillon LSO#: 35638M
Email: lpillon@stikeman.com
Tel: +1 416-869-5623

Brittney Ketwaroo LSO#: 89781K
Email: bketwaroo@stikeman.com
Tel: +1 416-869-5524

Lawyers for the Applicants

1. Mr. Robert Turpin is seeking accommodations from the Court that all proceedings in the Applicants' CCAA proceedings involving Mr. Turpin be conducted in plain text/writing to address what he describes as his ADHD, Dyslexia and sensory disabilities.

2. The Applicants are filing this aide memoire in accordance with the Endorsement of the Honourable Madam Justice Kimmel dated March 16, 2026.¹

A. Mr. Turpin's Previous Requests for Accommodations

3. Mr. Turpin has previously objected to the hearing of prior motions within the CCAA proceedings in accordance with the *Rules of Civil Procedure*² and the established practice endorsed by the Commercial List of the Ontario Superior Court of Justice. In response, the Court has provided Mr. Turpin with a number of accommodations, including:

- (a) Ensuring Mr. Turpin was added to the Service List and will be served with all written motion materials in a timely manner;
- (b) Providing Mr. Turpin with the opportunity to respond in writing to the motion if he has an objection; and
- (c) Providing Mr. Turpin with a Zoom link for all hearings with closed captioning and audio transcript functions activated.

4. Mr. Turpin objected to some or all the relief sought at motions held on January 16 and 27, February 11 and March 19, was provided with the accommodations listed above, and chose not to participate in the hearings.

¹ *In the Matter of a Plan of Compromise or Arrangement of 1242939 B.C. Unlimited Liability Company et al.* (March 16, 2026), Ont. S.C.J. [Commercial List], Court File No. CV-25-00738613-00CL ([Endorsement](#)) (the "**March 16 Endorsement**").

² *Rules of Civil Procedure R.R.O. 1990, Reg. 194.*

B. Mr. Turpin's Proprietary Claims Motion

5. Mr. Turpin has indicated his intention to bring a motion (the "**Proprietary Claims Motion**") seeking a declaration that Mr. Turpin has a proprietary interest in the Royal Charter as well as various pieces of art and Hudson's Bay artefacts (the "**Proprietary Claims**"). In support of his claims, Mr. Turpin has sent a significant number of emails to some or all of the Monitor, the Applicants and the Court.

6. Without prejudice to the Applicants' position with respect to future motions (as set forth below), the Applicants consent to the Proprietary Claims Motion (but only the Proprietary Claims Motion) proceeding on the basis of written submissions, provided that:

- (a) Mr. Turpin serves and files:
 - (i) a new Motion Record which includes:
 - (A) a clear index detailing the entire evidentiary record upon which Mr. Turpin is relying;
 - (B) a copy of each document upon which Mr. Turpin is relying; and
 - (C) a clear statement of the source of each document upon which Mr. Turpin is relying; and
 - (ii) a separate factum or written argument wherein Mr. Turpin articulates the basis for his assertion of the Proprietary Claims;
- (b) The Applicants and any interested stakeholder may serve and file a responding motion record and factum; and
- (c) The Monitor may serve and file a report with respect to the motion.

C. Future CCAA Motions

7. The Applicants do not consent to any other motion (other than the Proprietary Claims Motion) in these CCAA proceedings being heard in writing, including any future motion Mr. Turpin may wish to bring.

8. It is not possible to anticipate what additional relief Mr. Turpin may seek in the future. It is inappropriate and unfair to the Applicants and their stakeholders as well as to Mr. Turpin to determine now what accommodations may or may not be necessary or appropriate on a future motion without knowing the sort of relief Mr. Turpin may seek. As stated in *Niang v. Lakeshore Gardens Co-operative Homes Inc.*, "...a disability is not a blanket permission to violate the Rules or other laws. Each case is dealt with on its merits in accordance with the facts and applicable law."³

9. The vast majority of (if not all) motions that will be brought within the Applicants' CCAA proceedings will not concern Mr. Turpin or any interest Mr. Turpin has articulated to date. The default procedure for the hearing of all other motions in these CCAA proceedings should be that which has already been established by the Court as articulated in paragraphs 3 and 4 of the Endorsement of Justice Kimmel dated March 16, 2026.⁴

10. These CCAA proceedings involve and affect numerous stakeholders. As Justice Kimmel observed in Her Honour's February 13, 2026, Endorsement:

[54] As this court has said previously in *Niang v. Lakeshore Gardens Co-operative Homes Inc.*, 2024 ONSC 3246, at para. 9: "The court cannot simply address the needs of one party alone where doing so may prejudice the other parties. Accommodations sought in legal proceedings must take into account that there are other people whose rights might be affected". This concern is exacerbated in large insolvency and restructuring proceedings involving

³ 2024 ONSC 3246, para 29.

⁴ March 16 Endorsement at paras 3-4.

numerous stakeholders in which there are multiple motions to address settlements, sales transactions and distributions of proceeds, to name a few. This “real time litigation” involves a balancing act of competing interests, under the supervision of the Commercial Court. Certainty is one of the important hallmarks of large restructuring proceedings such as these, with each issue raised and decided in the progression towards a final resolution.⁵

11. The Monitor and the Applicants have incurred significant costs addressing the issues raised by Mr. Turpin. In the circumstances, it is appropriate that all motions heard within the Applicants’ CCAA proceedings be dealt with in a fair and cost-efficient manner.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 23rd day of March, 2026.

Stikeman Elliott LLP

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Lawyers for the Applicants

⁵ *In the Matter of a Plan of Compromise or Arrangement of 1242939 B.C. Unlimited Liability Company et al.* (February 13, 2026), Ont. S.C.J. [Commercial List], Court File No. CV-25-00738613-00CL ([Endorsement](#)).

SCHEDULE "A"
List of Authorities

1. *Niang v. Lakeshore Gardens Co-operative Homes Inc.*, 2024 ONSC 3246
2. *In the Matter of a Plan of Compromise or Arrangement of 1242939 B.C. Unlimited Liability Company et al.* (February 13, 2026), Ont. S.C.J. [Commercial List], Court File No. CV-25-00738613-00CL (Endorsement).
3. *In the Matter of a Plan of Compromise or Arrangement of 1242939 B.C. Unlimited Liability Company et al.* (March 16, 2026), Ont. S.C.J. [Commercial List], Court File No. CV-25-00738613-00CL (Endorsement).

I certify that I am satisfied as to the authenticity of every authority.

Date

March 23, 2026



Signature

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c. C-36, AS AMENDED, AND IN THE MATTER OF 1242939 B.C.
UNLIMITED LIABILITY COMPANY et al.

Court File No. CV-25-738613-00CL

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

Proceeding commenced at Toronto

AIDE MEMOIRE OF THE APPLICANTS

STIKEMAN ELLIOTT LLP

Barristers & Solicitors
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Ashley Taylor LSO#: 39932E
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