

**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 MONITOR
ALVAREZ & MARSAL CANADA INC.
(Accommodation Request of Mr. Turpin)**

1. As noted in this Court's endorsement dated March 16, 2026 (the "**March 16 Endorsement**"), starting in January of this year, Mr. Robert Rene Turpin has asserted various rights and entitlements in email correspondence directed to the Monitor, the Applicants, their counsel, and the Court. Most notably, Mr. Turpin asserts that he has a proprietary interest in the Royal Charter of 1670 (the "**Charter**"), which was subject to a Court approved sale process and sold by the Applicants pursuant to a transaction approved by this Court by Order dated December 11, 2025.¹

2. Mr. Turpin has objected to various motions in the Applicants' ongoing CCAA Proceedings. He has also demanded (including pursuant to an email styled as a "Notice of Motion" that he

¹ The Monitor detailed certain of these assertions and provided its views in connection therewith in its [Thirteenth Report](#) dated February 9, 2026, its [Supplement to the Thirteenth Report](#) dated February 10, 2026, and its [Fourteenth Report](#) dated March 16, 2026. The transaction in respect of the Charter closed on December 19, 2025, prior to the date Mr. Turpin first contacted the Monitor.

delivered on March 9, 2026) that all proceedings in which he is involved be conducted in “plain text/writing” (the “**Accommodation Request**”).

3. The March 16 Endorsement directed, among other things, that the Accommodation Request would be determined with an “in-writing” hearing date of March 30, 2026, and that to the extent the Monitor, the Applicants or any other interested stakeholders wish to respond to the Accommodation Request, they shall do so in writing in an Aide Memoire to be submitted by March 23, 2026. This Aide Memoire is submitted pursuant to the March 16 Endorsement, solely to provide the Monitor’s views in respect of the Accommodation Request. This Aide Memoire does not address the Monitor’s views in respect of the assertions made by Mr. Turpin in respect of the Charter or any other matter.

4. In the interest of resolving the issues raised by Mr. Turpin expeditiously, the Monitor does not object to this Court determining Mr. Turpin’s alleged interest in the Charter (or other of the Applicants’ property) in writing. However, the Monitor does not believe it is appropriate that any other motions in these CCAA Proceedings be determined entirely in writing, and agrees with the Court and the Applicants that the demand for all matters in these CCAA Proceedings to be heard entirely in writing is “not reasonable and cannot be accommodated”.² This includes future motions in these CCAA Proceedings to which Mr. Turpin may purport to have an interest in or object.

5. The Monitor therefore only consents to a specific motion to be brought by Mr. Turpin to address his assertions of an interest in the Charter and/or other assets of the Applicants (the

² *Re 1242939 B.C. Unlimited Liability Company et al (formerly Hudson's Bay Company ULC et al)*, [2026 ONSC 898](#) at [para 52](#).

“**Turpin Motion**”), to be determined entirely in writing. The Monitor understands that the Applicants are willing to consent on the same basis.

6. To ensure fairness for all parties, the Monitor is of the view that the Turpin Motion should be determined pursuant to a Court-ordered schedule governing the exchange of materials that: (a) requires all evidence to be relied on to be submitted by way of sworn affidavit and served on the CCAA service list; (b) allows the Applicants and other stakeholders, including the purchasers and recipients of the Charter, sufficient time to respond; and (c) provides for the delivery of a Report by the Monitor after materials have been exchanged by interested parties. The Monitor is available to speak to this matter in further detail should it be helpful to the Court.

All of which is respectfully submitted this 23rd day of March, 2026.

Bennett Jones LLP
BENNETT JONES LLP

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 MONITOR
(Accommodation Request of Mr. Turpin)

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Counsel for Alvarez & Marsal Canada Inc., solely in its capacity as
Monitor and not in its personal or corporate capacity