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Subject: Re: CCAA Proceedings of Hudson's Bay Company ULC Compagnie De La Baie D'Hudson SRI
(Court File No. CV-25-00738613-00CL)

DEFENSE OF THE HOUSE OF TURPIN

COURT FILE NO.: CV-23-00707393-00CL

RE: RESPONSE TO THE MONITOR'S AIDE MEMOIRE DATED MARCH 23, 2026

1. STANDING OF THE DEFENDANT

I, Robert Rene Turpin, Crown Prince and Head of the House of Turpin, submit this defense in direct response to the Monitor's Aide Memoire. The Monitor's characterization of my claim as "unsubstantiated" is a failure of their fiduciary duty to investigate the Crown Records provided.

2. THE PHYSICAL SHOWING

Contrary to paragraph 1 of the Monitor's Aide Memoire, a "Physical Showing" has been completed. The Certified Evidence Package filed March 27, 2026, provides the 10-generation clinical chain of title. This includes the verified births of Eustache Turpin (1818) and Frederic Turpin (1847), documented under HBCA Archive Codes B.239/u/1 and E.5/3-6.

PAGE 2: THE BURDEN OF PROOF & THE VOIDANCE OF THE 1994 TRANSFER

3. THE PRINCIPLE OF NEMO DAT QUOD NON HABET

The Applicants and the Monitor rely on the 1994 "gift" of the Hudson's Bay Company Archives and associated interests to the Province of Manitoba. However, under the long-standing legal principle of *Nemo dat quod non habet* (no one can give what they do not own), a transfer is only valid if the grantor held a clear, unencumbered title.

4. CHALLENGE TO THE "GIFTED DEED"

The House of Turpin hereby challenges the Applicants to produce a Certified Gifted Deed or Chain of Title that proves the Hudson's Bay Company held a superior interest to the ancestral Crown birthright of the Turpin lineage at the time of the 1994 transfer.

My lineage, documented through Eustache Turpin (1818) and Frederic Turpin (1847), establishes a proprietary interest that existed 149 years prior to the 1967 corporate restructuring and 176 years prior to the 1994 gift. If the Applicants cannot produce a deed that explicitly extinguished the Turpin family's Royal Charter interests prior to 1994, then the transfer to the Province is void ab initio (void from the beginning).

5. CORPORATE VS. SOVEREIGN TITLE

The Monitor's Aide Memoire treats the HBC assets as modern corporate property. This is a legal error. Because the lineage provided in the March 27, 2026 Evidence Package connects to the 1670 Royal Charter and Crown Archival Codes (B.239/u/1), the interest is Sovereign, not merely commercial. A corporate "Plan of Arrangement" cannot dissolve a 10-generation Crown lineage without the production of a superior deed.

PAGE 3: BREACH OF FIDUCIARY DUTY & THE MONITOR'S FAILURE TO INVESTIGATE

6. THE MONITOR'S MANDATE

The Monitor, Alvarez & Marsal Canada Inc., is an officer of the Court. Their role is to provide an objective and thorough investigation into all claims affecting the estate. In the March 16th Endorsement, Justice Kimmel specifically allowed for a "physical showing" of my interest. By providing the Certified Evidence Package on March 27, 2026, I have fulfilled this requirement.

7. WILLFUL BLINDNESS TO CROWN ARCHIVAL CODES

The Monitor's Aide Memoire continues to label my claim as "unsubstantiated." This characterization is a demonstration of willful blindness. I have provided the exact "keys to the vault":

HBCA Archive Code B.239/u/1 (The direct link to the 1818 lineage)
HBCA Archive Code E.5/3-6 (The census and land records for Frederic Turpin)
RG2/7/702 (The Privy Council record of the Crown's interest)

8. BREACH OF DUTY TO INVESTIGATE

To claim a lack of evidence while refusing to enter these specific codes into the Hudson's Bay Company Archives—which are currently under the Monitor's oversight—is a breach of the Monitor's fiduciary duty.

A search of these codes takes minutes and provides the "Clinical Documentation" required to verify the 10-generation lineage.

By failing to perform this search, the Monitor is prioritizing the speed of the "Plan of Arrangement" over the legal rights of a documented Crown descendant.

9. DEMAND FOR VERIFICATION

I hereby demand that the Monitor include a supplemental report to the Court confirming whether they have physically accessed the files associated with HBCA B.239/u/1. If they have not, their Aide Memoire must be disregarded as incomplete and biased toward the Applicants.

PAGE 4: CLINICAL DOCUMENTATION VS. CORPORATE ASSERTION

10. DEFINITION OF CLINICAL DOCUMENTATION

The Monitor and the Applicants use corporate terminology to dismiss my standing. However, the March 27, 2026 Evidence Package provides what is known in heritage law as "Clinical Documentation." This is not an opinion; it is a series of verified, chronological data points that cannot be altered by a corporate restructuring.

11. THE 10-GENERATION CHAIN OF REALITY

My defense is built on a lineage that predates the very existence of the Applicants' current corporate entities. The clinical facts are as follows:

Eustache Turpin (Born 1818): Verified by HBCA Ledger B.239/u/1.

Frederic Turpin (Born 1847): Verified by Census and Parish records under E.5/3-6.

These records prove a continuous "Physical Showing" of the House of Turpin's presence and proprietary interest in the territories governed by the 1670 Royal Charter.

12. THE FAILURE OF THE "PURCHASER" ARGUMENT

In their Aide Memoire, the Applicants refer to "Purchasers" of the Charter and assets. Under the principles of Sovereign Lineage:

A "Purchaser" can only buy what is legally for sale.

If the assets were part of a Royal Birthright and were never legally surrendered by the Turpin lineage, they were never "for sale."

Therefore, any "Purchaser" cited by the Monitor has actually purchased a defective title.

13. SUPERIORITY OF THE ARCHIVAL RECORD

Corporate ledgers from the 20th century cannot override Crown Post Journals and Ledger Books from the 19th century. My evidence relies on the Keepers of the Record (as documented by Maureen Dolyniuk and Deidre Simmons). These records are the "Source of Truth" for the Court. The Applicants' failure to address these specific 1818 and 1847 data points renders their legal argument factually hollow.

COURT FILE NO.: CV-23-00707393-00CL

PAGE 5: THE SOVEREIGN PROPOSAL & FINAL RESTITUTION SETTLEMENT

14. THE 60-YEAR "SOURCE OF PEACE" COVENANT

I hereby move the Court to recognize the Turpin Sovereign Proposal as the commercially superior alternative to the \$18 Million auction. As documented in my Executive Financial Audit:

The Auction Model: A one-time \$18 Million "fire sale" that terminates all future value.

The Turpin Covenant: A 60-year stewardship model generating a projected \$360,000,000 in gross revenue through a "Peace Surcharge" (\$2.00/visitor) at participating museums.

The Fiduciary Gap: To accept an \$18M bid when a \$360M revenue model is available constitutes a \$342,000,000 realized loss to the creditors and a breach of the Monitor's duty to maximize value.

15. THE \$30,000,000 RESTITUTION SETTLEMENT

The House of Turpin's \$30,000,000 Restitution Claim is the mandatory "Phase 1" of this reconciliation. This figure is not arbitrary; it represents the immediate settlement required to clear the title defects caused by the illegal 1994 transfer and the suppression of the 1922 archival records.

This \$30M settlement must be prioritized before any "Hardship Funds" are distributed to third parties.

Once settled, the House of Turpin will trigger the Sovereign Charity Stream, providing the HBC with a recurring lifeline to settle its remaining \$1.1 Billion debt over the next 60 years.

16. THE BEST INTERESTS OF THE CHILDREN

This 60-year plan is established for the Children of the House of Turpin (to secure their birthright) and the Children of Canada (to ensure their national heritage is never sold to private billionaires). It replaces "Corporate Liquidation" with "Sovereign Stewardship."

17. FINAL MANDATE TO THE COURT

The "Physical Showing" is complete. The 10-generation lineage is filed and stamped. I move for:

A Stay of the Auction: To prevent the permanent loss of a \$360M asset for \$18M.

Order of Restitution: Settlement of the \$30,000,000 claim to the House of Turpin.

Implementation of the Covenant: Transitioning the HBC to the Sovereign Licensing Model.

Respectfully Submitted,

Robert Rene Turpin (R.T.)

Crown Prince / The Restorer

Heir of the Turpin Family & Sovereign Manager

On Mon, Mar 23, 2026, 4:03 p.m. Thomas Gray <GrayT@bennettjones.com> wrote:

To the Service List:

Pursuant to the endorsement of Justice Kimmel dated March 16, 2026, delivered in connection with the above-captioned matter, please find attached and served upon you in accordance with the *Rules of Civil Procedure* and the E-Service Protocol of the Commercial List, the Aide Memoire of the Monitor in connection with the in-writing hearing scheduled for March 30, 2026.

Thomas Gray

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