

District of:  
Division No.  
Court No.  
Estate No.

☒ Original ☐ Amended

— Form 78 —

Statement of Affairs (Business Bankruptcy) made by an entity  
(Subsection 49(2) and Paragraph 158(d) of the Act / Subsections 50(2) and 62(1) of the Act)

To the bankrupt:


You are required to carefully and accurately complete this form and the applicable attachments showing the state of your affairs on the date of the bankruptcy, on the 19th day of September 2019. When completed, this form and the applicable attachments will constitute the Statement of Affairs and must be verified by oath or solemn declaration.

LIABILITIES (as stated and estimated by the officer)	
1. Unsecured creditors as per list "A" . . . . .	311,384,907.38
Balance of secured claims as per list "B" . . . . .	4,295,989.84
Total unsecured creditors . . . . .	315,680,897.22
2. Secured creditors as per list "B" . . . . .	12,563,884.79
3. Preferred creditors as per list "C" . . . . .	0.00
4. Contingent, trust claims or other liabilities as per list "D" estimated to be reclaimable for . . . . .	0.00
Total liabilities . . . . .	328,244,782.01
Surplus . . . . .	NIL

ASSETS (as stated and estimated by the officer)	
1. Inventory . . . . .	0.00
2. Trade fixtures, etc. . . . .	0.00
3. Accounts receivable and other receivables, as per list "E"	
Good . . . . .	715,214.54
Doubtful . . . . .	12,888,110.87
Bad . . . . .	250,000.00
Estimated to produce . . . . .	465,214.54
4. Bills of exchange, promissory note, etc., as per list "F" . . . . .	0.00
5. Deposits in financial institutions . . . . .	12,098,670.25
6. Cash . . . . .	0.00
7. Livestock . . . . .	0.00
8. Machinery, equipment and plant . . . . .	0.00
9. Real property or immovable as per list "G" . . . . .	0.00
10. Furniture . . . . .	0.00
11. RRSPs, RRIFFs, life insurance, etc. . . . .	0.00
12. Securities (shares, bonds, debentures, etc.) . . . . .	0.00
13. Interests under wills . . . . .	0.00
14. Vehicles . . . . .	0.00
15. Other property, as per list "H" . . . . .	0.00
If bankrupt is a corporation, add:	
Amount of subscribed capital . . . . .	0.00
Amount paid on capital . . . . .	0.00
Balance subscribed and unpaid . . . . .	0.00
Estimated to produce . . . . .	0.00
Total assets . . . . .	12,563,884.79
Deficiency . . . . .	315,680,897.22

I, Alan J Hutchens, of the city of Toronto in the Province of Ontario, do swear (or solemnly declare) that this statement and the attached lists are to the best of my knowledge, a full, true and complete statement of my affairs on the 19th day of September 2019 and fully disclose all property of every description that is in my possession or that may devolve on me in accordance with the Act.

SWORN (or SOLEMNLY DECLARED)  
before me at the city of Toronto in the Province of Ontario, on this 19th day of September 2019.

  
Gail Anne Jenkinson, a Commissioner, etc.,  
Province of Ontario, for Alvarez & Marsal Canada Inc.  
Expires April 26, 2020.

  
Alan J Hutchens

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FORM 78 – Continued

List "B"  
Secured Creditors

Erwin Hymer Group North America, Inc.

No.	Name of creditor	Address	Amount of claim	Particulars of security	When given	Estimated value of security	Estimated surplus from security	Balance of claim
1	Cornier Flag Llc	199 Bay Street Suite 4000, Commerce Court West Toronto ON M5L 1A9 CAN	5,539,435.88	Cash on Hand - Trust - 1554898 - Royal Bank of Canada  Debts Due - Business - Camping World RV - RV Dealer  Debts Due - Business - Canada Revenue Agency - Tax Authority	14-Feb-2019  14-Feb-2019  14-Feb-2019	5,539,435.88  0.00  0.00		
2	Erwin Hymer Group SE	Royal Bank Plaza, South Tower 200 Bay Street, Suite 3800 Toronto ON M5J 2Z4 CAN	10,029,048.07	Cash on Hand - Trust - 1554898 - Royal Bank of Canada  Debts Due - Business - Canada Revenue Agency - Tax Authority  Debts Due - Business - Camping World RV - RV Dealer	15-Apr-2011  15-Apr-2011  15-Apr-2011	5,297,788.69  392,224.04  72,990.50		4,266,044.84
3	Mercedes-Benz Financial Services Canada Corporation	77 King Street West, Suite 400, Toronto-Dominion Centre Toronto ON M5K 0A1 CAN	435,635.00	Cash on Hand - Trust - 1554898 - Royal Bank of Canada  Debts Due - Business - Camping World RV - RV Dealer  Debts Due - Business - Canada Revenue Agency - Tax Authority	29-Jul-2011  29-Jul-2011  29-Jul-2011	435,635.00  0.00  0.00		
4	Mercedes-Benz Financial Services Usa Llc	535 Anton Boulevard, Suite 1000 Costa Mesa CA 92626-1977 US	825,810.68	Cash on Hand - Trust - 1554898 - Royal Bank of Canada  Debts Due - Business - Camping World RV - RV Dealer  Debts Due - Business - Canada Revenue Agency - Tax Authority	    	825,810.68  0.00  0.00		

19-Sep-2019

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FORM 78 – Continued

List "B"  
Secured Creditors

Erwin Hymer Group North America, Inc.

No.	Name of creditor	Address	Amount of claim	Particulars of security	When given	Estimated value of security	Estimated surplus from security	Balance of claim
5	RS Finishing Systems, Inc.	130 Adelaide St. West, 7th Floor Toronto ON M5H 2K4 CAN	29,945.00	Debts Due - Business - Camping World RV - RV Dealer	01-Feb-2019	0.00		
				Debts Due - Business - Canada Revenue Agency - Tax Authority	01-Feb-2019	0.00		29,945.00
				Cash on Hand - Trust - 1554898 - Royal Bank of Canada	01-Feb-2019	0.00		
Total:			16,859,874.63			12,563,884.79	0.00	4,295,989.84

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FORM 78 – Continued

List "C"  
Preferred Creditors for Wages, Rent, etc.

Erwin Hymer Group North America, Inc.

No.	Name of creditor	Address and occupation	Nature of claim	Period during which claim accrued	Amount of claim	Amount payable in full	Difference ranking for dividend
Total:					0.00	0.00	0.00

19-Sep-2019  
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FORM 78 – Continued

List "D"  
Contingent or Other Liabilities

Erwin Hymer Group North America, Inc.

No.	Name of creditor or claimant	Address and occupation	Amount of liability or claim	Amount expected to rank for dividend	Date when liability incurred	Nature of liability
Total:			0.00	0.00		

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FORM 78 – Continued

List "E"  
Debts Due to the Bankrupt

Erwin Hymer Group North America, Inc.

No.	Name of debtor	Address and occupation	Nature of debt	Amount of debt (good, doubtful, bad)	Folio of ledgers or other book where particulars to be found	When contracted	Estimated to produce	Particulars of any securities held for debt
1	Camping World RV	201 76th Street South West Grand Rapids MI 49548 USA RV Dealer	Proceeds of Sale	72,990.50 0.00 0.00	Receiver's Invoice	26-Jul-2019	72,990.50	Registration and title documents for vehicles sold
2	Canada Revenue Agency	166 Frederick Street Kitchener ON N2H 0A9 Tax Authority	HST Refunds	392,224.04 0.00 0.00	HST Filings	15-Feb-2019	392,224.04	No Security
3	Gerzeny's RV World	5600 Enterprise Parkway Fort Myers FL 33905 USA RV Dealer	Proceeds from Sale	250,000.00 0.00 250,000.00	Propose Settlement Agreement	03-Sep-2019	0.00	Settlement of RV Proceeds Against Outstanding Claims
4	JRV Group	1945 Burgundy Place Ontario CA 91761 USA Related Company	Intercompany Estate Claim	0.00 12,888,110.87 0.00	Intercompany Ledger Details	27-Aug-2019	0.00	Intercompany Service Agreements
Total:				715,214.54 12,888,110.87 250,000.00			465,214.54	

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FORM 78 – Continued

List "F"

Bills of Exchange, Promissory Notes, Lien Notes, Chattel  
Mortgages, etc., Available as Assets

Erwin Hymer Group North America, Inc.

No.	Name of all promissory, acceptors, endorsers, mortgagors, and guarantors	Address	Occupation	Amount of bill or note, etc.	Date when due	Estimated to produce	Particulars of any property held as security for payment of bill or note, etc.
Total:				0.00		0.00	

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FORM 78 – Continued

List "G"  
Real Property or Immovables Owned by Bankrupt  
Erwin Hymer Group North America, Inc.

Description of property	Nature of bankrupt interest	In whose name does title stand	Total value	Particulars of mortgages, hypothecs, or other encumbrances (name, address, amount)	Equity or surplus
Total:			0.00		0.00

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FORM 78 – Concluded

List "H"  
Property

Erwin Hymer Group North America, Inc.  
FULL STATEMENT OF PROPERTY

Nature of property	Location	Details of property	Original cost	Estimated to produce
(a) Stock-in-trade			0.00	0.00
(b) Trade fixtures, etc.			0.00	0.00
(c) Cash in financial institutions	Royal Bank of Canada 200 Bay Street Toronto ON M5J 2J5	1554898	12,098,670.25	12,098,670.25
(d) Cash on hand			0.00	0.00
(e) Livestock			0.00	0.00
(f) Machinery, equipment and plant			0.00	0.00
(g) Furniture			0.00	0.00
(h) Life insurance policies, RRSPs, etc.			0.00	0.00
(i) Securities			0.00	0.00
(j) Interests under wills, etc.			0.00	0.00
(k) Vehicles			0.00	0.00
(l) Taxes			0.00	0.00
(m) Other			0.00	0.00
			<b>Total:</b>	<b>12,098,670.25</b>

19-Sep-2019

Date

Alan J Hutchens