

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

BANK OF MONTREAL

Applicant

- and -

16002471 CANADA INC. and HUDSON RESTORATION MARKHAM INC.

Respondents

APPLICATION UNDER SUBSECTION 243(1) OF THE BANKRUPTCY AND INSOLVENCY
ACT, R.S.C. 1985, c. B 3, AS AMENDED, AND SECTION 101 OF THE COURTS OF
JUSTICE ACT, R.S.O. 1990, c. C.43, AS AMENDED

SUPPLEMENTARY APPLICATION RECORD

May 27, 2026

CHAITONS LLP

5000 Yonge Street, 10th Floor
Toronto, ON M2N 7E9

Maya Poliak (LSO# 54100A)

Tel: (416) 218-1161

Email: maya@chaitons.com

Hugh McHenry (LSO# 93272D)

Tel: (416) 218 – 1770

Email: HMcHenry@chaitons.com

**Lawyers for the Applicant, Bank of
Montreal**

TO: SERVICE LIST

SERVICE LIST
(as at May 27, 2026)

CHAITONS LLP 5000 Yonge Street, 10th Floor Toronto, ON M2N 7E9 Maya Poliak (LSO# 54100A) Tel: (416) 218-1161 Email: maya@chaitons.com Hugh McHenry (LSO# 93272D) Tel: (416) 218-1770 Email: HMcHenry@chaitons.com Lawyers for the Applicant, Bank of Montreal	MILLER THOMSON LLP 255 Queen Avenue, Suite 2010 London, ON N6A 5R8 Tony Van Klink (LSO# 29008M) Tel: 519.931.3509 Email: tvanklink@millerthomson.com Lawyers for the Proposed Receiver, BDO Canada Limited
BANK OF MONTREAL First Canadian Place 100 King Street West, 19th Floor Toronto, ON M5X 1A1 Attention: Paul Mgbolu Tel: 905.743.1178 Email: paul.mgbolu@bmo.com Applicant	BDO CANADA LIMITED 20 Wellington East, Suite 500 Toronto, ON M5E 1C5 Josie Parisi Tel: (416) 369-6031 Email: jparisi@bdo.ca Proposed Receiver
16002471 CANADA INC. 2334 Hammond Road Mississauga, ON L5K 1T2 Attention: Minxiang Guo Email: kuomx17@outlook.com; min.guo@hudsonmarkham.com Respondent	HUDSON RESTORATION MARKHAM INC. 802 Cochrane Drive Markham, ON L3R 8C9 Attention: Minxiang Guo Email: kuomx17@outlook.com; min.guo@hudsonmarkham.com Respondent

MINXIANG GUO 802 Cochrane Drive Markham, ON L3R 8C9 Email: kuomx17@outlook.com ; min.guo@hudsonmarkham.com Personal Guarantor	METCALFE, BLAINEY & BURNS LLP 18 Crown Street Drive, Suite 202 Markham, ON L3R 9X8 Janet K. Y. Lee (Tel : (905) 475-7676 Ext. 338 Email : janetlee@mbb.ca Anran Wang Email: anranwang@mbb.ca Lawyers for 16002471 Canada Inc., Hudson Restoration Markham Inc. and Minxiang Guo
HIS MAJESTY THE KING IN RIGHT OF THE PROVINCE OF ONTARIO AS REPRESENTED BY THE MINISTER OF FINANCE Insolvency Unit 33 King Street West, 6 th floor Oshawa, Ontario L1H 8H5 Steven Groeneveld Tel: (905) 431-8380 Email: steven.groeneveld@ontario.ca ; insolvency.unit@ontario.ca	CANADA REVENUE AGENCY c/o Department of Justice Tax Law Services Division 120 Adelaide Street West, Suite 400 Toronto, Ontario M5H 1T1 Tessania Lawrence Email: tessania.lawrence@justice.gc.ca ; AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca
CITY OF BURLINGTON 426 Brant Street, PO Box 5103 Burlington, Ontario L7R 2G2 Email: city@burlington.ca	

SECURED CREDITORS

VAULT CREDIT CORPORATION 41 Scarsdale Road, Suite 5 Toronto, ON M3B 2R2 Tel.: 416-499-8466 Email: info@vaultcredit.ca PPSA Registrant	FORD CREDIT CANADA COMPANY Box 1800, RPO Lakeshore West Oakville, ON L6K 0J8 Email: bbankrup@ford.com PPSA Registrant
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EMAIL ADDRESSES:

maya@chaitons.com; HMcHenry@chaitons.com; tvanklink@millerthomson.com;
paul.mgbolu@bmo.com; jparisi@bdo.ca; kuomx17@outlook.com;
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B E T W E E N:

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INDEX

TAB	DOCUMENT
1.	Affidavit of Gary Feldman sworn May 26, 2026
A	Endorsement of Justice Mills dated April 8, 2026
B	Letter from counsel for the Borrowers dated May 22, 2026
C	Email from counsel for Bank of Montreal dated May 24, 2026

ONTARIO
SUPERIOR COURT OF JUSTICE

BETWEEN:

BANK OF MONTREAL

Applicant

- and -

16002471 CANADA INC. and HUDSON RESTORATION MARKHAM INC.

Respondents

APPLICATION UNDER SUBSECTION 243(1) OF THE BANKRUPTCY AND INSOLVENCY ACT, R.S.C. 1985, c. B 3, AS AMENDED, AND SECTION 101 OF THE COURTS OF JUSTICE ACT, R.S.O. 1990, c. C.43, AS AMENDED.

AFFIDAVIT OF GARY FELDMAN

I, GARY FELDMAN, of the City of Toronto, in the Province of Ontario,

MAKE OATH AND SAY:

1. I am a partner with the law firm of Chaitons LLP, solicitors for Bank of Montreal (“**BMO**” or the “**Bank**”), and as such have knowledge of the matters to which I hereinafter depose. Where I have obtained information from others, I have identified the source of such information and believe such information to be true.

2. I make this affidavit in support of BMO’s application for an order appointing BDO Canada Limited (“**BDO**”) as receiver over the present and future property, assets and undertakings of 16002471 Canada Inc. (“**160**”) and Hudson Restoration Markham Inc. (“**Hudson**”, and together with 160, the “**Borrowers**”). The indebtedness owing by the Borrowers to BMO is referred to

herein as the “**Indebtedness**”.

3. On April 8, 2026, the application came before Justice Mills and was adjourned to May 27, 2026 to permit the Borrowers a further opportunity to repay the Indebtedness in full. A copy of the Endorsement of Justice Mills dated April 8, 2026 (the “**April 8 Endorsement**”) is attached as **Exhibit “A”**.

4. Pursuant to paragraphs 1(b) and 1(c) of the April 8 Endorsement, the Borrowers were required to repay the Indebtedness in full by May 23, 2026 (the “**May 23 Deadline**”), failing which the Borrowers irrevocably consented to the issuance of the receivership order sought by BMO.

5. By letter dated May 22, 2026 from counsel for the Borrowers, the Borrowers advised that they would not be repaying the Indebtedness in full by the May 23 Deadline and instead requested further indulgence and forbearance from BMO until October 30, 2026. A copy of the May 22, 2026 letter is attached as **Exhibit “B”**.

6. By email dated May 24, 2026, counsel for BMO advised counsel for the Borrowers that unless the Indebtedness was repaid in full by May 25, 2026 (the “**May 25 Deadline**”), BMO would seek the appointment of a receiver at the scheduled May 27, 2026 hearing. A copy of the May 24, 2026 email is attached as **Exhibit “C”**.

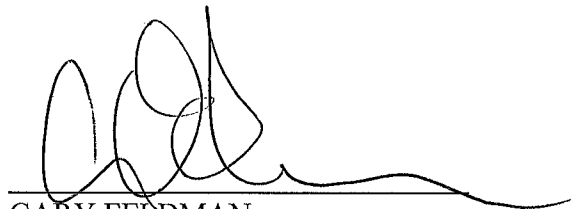
7. No payment in full was made to BMO by the May 25 Deadline. Accordingly, the Borrowers failed to satisfy the repayment requirements under the April 8 Endorsement and the Indebtedness remains outstanding.

8. In the circumstances, BMO seeks the appointment of BDO as receiver over the present and future property, assets and undertakings of the Borrowers.

SWORN BEFORE ME VIA)
 VIDEOCONFERENCE, the affiant being)
 located in the City of Toronto, and)
 the Commissioner being located in the City)
 of Toronto, in the Province of Ontario)
 on May 26th, 2026)



HUGH MCHENRY
 LSO #93272D
 A Commissioner, *etc.*



GARY FELDMAN

***THIS IS EXHIBIT "A" TO THE
AFFIDAVIT OF GARY FELDMAN
SWORN BEFORE ME THIS 26TH
DAY OF MAY, 2026***

A handwritten signature in black ink, appearing to be "JL" followed by a stylized flourish.

A Commissioner Etc.

COURT FILE NO.: CV-26-00000666-0000

SUPERIOR COURT OF JUSTICE – ONTARIO

491 Steeles Avenue East, Milton ON L9T 1Y6

RE: Bank of Montreal, applicant

AND:

16002471 Canada Inc. and Hudson Restoration Markham Inc.,
respondents

BEFORE: Justice J. Mills

COUNSEL: Maya Poliak / Hugh McHenry, for the applicant

HEARD: April 8, 2026, by video conference

ENDORSEMENT

[1] On consent, this matter is adjourned on the following terms:

- a. The application is adjourned to Wednesday, May 27, 2026, for a hearing of no more than 30 minutes.
- b. The Respondents shall pay the full amount owing to the Applicant by Saturday, May 23, 2026.
- c. The Respondents irrevocably consent to the Receivership Order, in the form attached to the Application Record, being issued at the scheduled appearance on May 27, 2026, if the amounts owing to the Applicant are not repaid in full by May 23, 2026.

J. E. Mills J.

***THIS IS EXHIBIT "B" TO THE
AFFIDAVIT OF GARY FELDMAN
SWORN BEFORE ME THIS 26TH
DAY OF MAY, 2026***

A handwritten signature in cursive script, appearing to be "R. J. [unclear]".

A Commissioner Etc.

A handwritten signature in cursive script, appearing to be "R. J. [unclear]".

May 22, 2026

Sent by E-mail: Maya@chaitons.com

Janet K. Y. Lee
1 905 475 7676 Ext. 338
janetlee@mbb.ca

Maya Poliak
50000 Yonge St 10th Flr
North York, ON
M2N 7E9

Dear Maya,

Re: BMO loans to Hudson Restoration Markham Inc. and 16002471 Canada Inc.

Our Reference No.: 33754

We write on behalf of Hudson Restoration Markham Inc. and 16002471 Canada Inc., and Mr. Minxiang Guo ("Guo", and together with the other two parties, the "Debtors"), further to ongoing discussions regarding the indebtedness owing to the Bank.

In light of recent developments affecting the refinancing process, the Debtors wish to present a revised proposal to repay the indebtedness at the earliest opportunity:

1. The Debtors will make payments as follows:
 - (a) \$200,000.00 on or before 5 pm **May 25, 2026**;
 - (b) a further \$200,000.00 on or before **September 30, 2026**; and
 - (c) additional payments from refinancing proceeds of 657 N Albert, as set out below.
2. Conditional Forbearance – The Bank shall extend its current forbearance and refrain from taking any enforcement or receivership steps until **October 30, 2026**.
3. Re-Financing of 657 N Albert (Security for the Operating Demand Loan) – The Debtors request that the Bank consider a discharge of the charge registered against 657 N Albert Street, Waterloo, for the purpose of permitting a refinancing of that property. The proceeds of such refinancing will be paid to the Bank to reduce the loan owed by the Debtors to the Bank. We expect the refinancing proceeds to be approximately \$200,000. According to the Payout Statement, approximately \$140,000 is owed under the Operating Demand loan.

Guo's guarantee shall remain in place and unchanged except that it shall no longer be secured by 657 N Albert. All other security will remain unchanged.

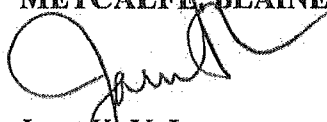
Our clients would also request that the Bank consider reducing the applicable interest rate during the extension period or alternatively limiting additional enforcement-related legal and receivership costs while the proposal is being performed.

Our clients submit that this is a practical and commercially reasonable proposal that maximizes recovery while minimizing costs for all parties.

We would appreciate the Bank's urgent consideration and response, given the time-sensitive nature of this matter.

Yours very truly,

METCALFE, BLAINEY & BURNS LLP



Janet K. Y. Lee
Managing Partner

***THIS IS EXHIBIT "C" TO THE
AFFIDAVIT OF GARY FELDMAN
SWORN BEFORE ME THIS 26TH
DAY OF MAY, 2026***

A handwritten signature in cursive script, appearing to read "M. J.", is written above a horizontal line.

A Commissioner Etc.

Antoinette De Pinto

From: Maya Poliak
Sent: Sunday, May 24, 2026 9:35 PM
To: Janet Lee
Cc: Gary Feldman; Hugh McHenry; Lynda Christodoulou; Silvia Durante; Anran Wang
Subject: RE: 33754 - Proposal re: BMO loans to Hudson Restoration Markham Inc. and 16002471 Canada Inc.

Good evening Ms. Lee

Your proposal is not acceptable to BMO. Unless the bank is paid out in full by the 25th of May, 2026, the Bank will proceed to appoint a receiver on the 27th of May.

Maya Poliak | Partner
Chaitons LLP | T: 416.218.1161

From: Anran Wang <anranwang@mbb.ca> **On Behalf Of** Janet Lee
Sent: Friday, May 22, 2026 10:42 AM
To: Maya Poliak <Maya@chaitons.com>
Cc: Gary Feldman <Gary@chaitons.com>; Hugh McHenry <HMcHenry@chaitons.com>; Janet Lee <janetlee@mbb.ca>; Lynda Christodoulou <LyndaC@chaitons.com>; Silvia Durante <Silvia@chaitons.com>; Anran Wang <anranwang@mbb.ca>
Subject: RE: 33754 - Proposal re: BMO loans to Hudson Restoration Markham Inc. and 16002471 Canada Inc.

CAUTION: [External]

Dear Maya,

Please find attached letter.

Janet

Regards,

Janet Lee
Managing Partner



Metcalfe, Blainey & Burns LLP
Unit 202, 18 Crown Steel Drive
Markham, Ontario

BANK OF MONTREAL
Applicant

-and-

16002471 CANADA INC. ET AL.
Respondents

Court File No. CV-26-00000666-0000

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT
MILTON

AFFIDAVIT OF GARY FELDMAN
SWORN MAY 26, 2026

CHAITONS LLP
Barristers & Solicitors
5000 Yonge Street, 10th Floor
Toronto, ON M2N 7E9

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Lawyers for the Applicant

BANK OF MONTREAL
Applicant

-and-

16002471 CANADA INC. ET AL.
Respondents

Court File No. CV-26-00000666-0000

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT
MILTON

SUPPLEMENTARY APPLICATION RECORD

CHAITONS LLP

Barristers & Solicitors
5000 Yonge Street, 10th Floor
Toronto, ON M2N 7E9

Maya Poliak (LSO #54100A)

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Lawyers for the Applicant