



Court File No. CV-25-00001591-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

THE HONOURABLE)
JUSTICE CHANG)
)
)
) THURSDAY, THE 12th DAY
) OF MARCH, 2026

BETWEEN:

OAKVILLE CENTRE MEDICAL REALTY LTD.

Applicant

- and -

361 NORTH SERVICE ROAD STORAGE GP CORPORATION

Respondent

AND IN THE MATTER OF AN APPLICATION UNDER Section 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

ANCILLARY RELIEF AND RECEIVER'S DISCHARGE ORDER

THIS MOTION, made by BDO Canada Limited, in its capacity as the Court-appointed receiver (in such capacity, the "**Receiver**"), of the property, assets and undertaking of 361 North Service Road Storage GP Corporation (the "**Debtor**"), including the real property municipally known as 361 North Service Road West, Oakville, Ontario (collectively, referred to hereinafter as the "**Property**"), for an order, *inter alia*, (i) approving the First Report of the Receiver dated March 4, 2026 (the "**First Report**") and the conduct and activities of the Receiver set out therein; (ii) sealing the confidential supplemental report to the First Report dated March 4, 2026 (the "**Confidential Supplemental Report**"); (iii) approving the fees and disbursements of the Receiver and its legal counsel, Capstone Legal ("**Capstone**"), including the Fee Accrual (as defined in the First Report); and (iv) discharging BDO as Receiver upon the filing of the discharge certificate attached as Schedule "A" hereto (the "**Discharge Certificate**"), confirming

that all outstanding matters in the receivership proceedings have been completed (the “**Remaining Activities**”), and releasing BDO from any and all liability as set out in paragraph 6 of this Order, was heard this day by video conference.

ON READING the First Report and the appendices thereto, including the affidavits of Peter Naumis sworn March 2, 2026 and Danny Nunes sworn March 4, 2026 as to the fees of the Receiver and its legal counsel, Capstone, respectively, attached as Appendices “III” and “IV” to the First Report (together, the “**Fee Affidavits**”) and the Confidential Supplemental Report and the appendices thereto, and on hearing the submissions of counsel for the Receiver and those other parties that were present as listed on the counsel slip, no other party appearing although duly served as appears from the Affidavit of Service of Danny Nunes dated March 5, 2026, filed.

SERVICE

1. **THIS COURT ORDERS** that the time for service of the Notice of Motion and the Receiver’s Motion Record is hereby abridged so that this motion is properly returnable today and hereby dispenses with further service thereof.

APPROVAL OF ACTIVITIES AND FEES

2. **THIS COURT ORDERS** that the First Report and the conduct and activities of the Receiver set out therein are hereby approved, provided, however that only the Receiver in its personal capacity and only with respect to its own personal liability shall be entitled to rely upon or utilize in any way such approval.

3. **THIS COURT ORDERS** that the fees and disbursements of the Receiver and Capstone, as set out in the First Report and the Fee Affidavits appended thereto, be and are hereby approved, including the Fee Accrual related to the Remaining Activities.

SEALING OF CONFIDENTIAL SUPPLEMENTAL REPORT

4. **THIS COURT ORDERS** that the Confidential Supplemental Report is hereby sealed pending the earlier of the closing of the transaction contemplated in the agreement of purchase and sale between the Receiver and Oakville Centre Medical Realty Ltd. dated February 25, 2026 or further Order of this Court.

RECEIVER'S DISCHARGE

5. **THIS COURT ORDERS** that upon the Receiver filing the Discharge Certificate certifying that it has completed the Remaining Activities, the Receiver shall be discharged as Receiver of the Debtor's Property, provided however that notwithstanding its discharge herein, (a) the Receiver shall remain Receiver for the performance of the Remaining Activities and such other incidental duties as may be required to complete the administration of the receivership herein, and (b) the Receiver shall continue to have the benefit of the provisions of all Orders made in this proceeding, including all approvals, protections and stays of proceedings in favour of BDO, in its capacity as Receiver.

6. **THIS COURT ORDERS AND DECLARES** that BDO and its employees, agents, representatives, advisors and counsel are hereby released and discharged from any and all liability that BDO now has or may hereafter have by reason of, or in any way arising out of, the acts or omissions of BDO while acting in its capacity as Receiver herein, save and except for any gross negligence or wilful misconduct on the Receiver's part. Without limiting the generality of the foregoing, BDO is hereby forever released and discharged from any and all liability relating to matters that were raised, or which could have been raised, in the within receivership proceedings, save and except for any gross negligence or wilful misconduct on the Receiver's part.

7. **THIS COURT ORDERS** that this Order and all of its provisions are effective as of 12:01 AM EST on the date of this Order and the Order is enforceable without any need for entry or filing.

A handwritten signature in black ink, appearing to be 'C. M. Jones', written over a horizontal line.

Date of Issuance: March 18, 2026

SCHEDULE “A”

FORM OF RECEIVER’S DISCHARGE CERTIFICATE

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RECEIVER’S DISCHARGE CERTIFICATE

RECITALS

I. Pursuant to the Order of the Honourable Justice Kurz of the Ontario Superior Court (the “**Court**”) dated June 25, 2025, BDO Canada Limited, was appointed as the receiver (the “**Receiver**”), without security, of the property, assets and undertaking of 361 North Service Road Storage GP Corporation (the “**Debtor**”), including but not limited to the real property owned by the Debtor municipally known as 361 North Service Road West, Oakville, ON.

II. Pursuant to an Order of the Court dated March 12, 2026 (the “**Ancillary Relief and Discharge Order**”), the Court approved the discharge of the Receiver to become effective upon the filing by the Receiver of a certificate certifying that all Remaining Activities, as defined in the Ancillary Relief and Discharge Order, have been completed.

THE RECEIVER CERTIFIES the following:

1. All Remaining Activities in respect of the receivership proceeding, including but not limited to those set out in the First Report, have been completed; and
2. This Certificate was filed by the Receiver at _____ [TIME] on _____ [DATE].

BDO CANADA LIMITED, in its capacity as Court- appointed Receiver of the property, assets and undertakings of Oakville Centre Medical Realty Ltd., and not in its personal or corporate capacity.

Name:
Title:

OAKVILLE CENTRE MEDICAL REALTY LTD.

and

**361 NORTH SERVICE ROAD STORAGE GP
CORPORATION**

Applicant

Respondent

ONTARIO
SUPERIOR COURT OF JUSTICE

Proceeding Commenced at Milton

**ANCILLARY RELIEF AND RECEIVER'S DISCHARGE
ORDER**

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