

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

ROYAL BANK OF CANADA

Applicant

and

1000502168 ONTARIO INC. operating as THE KIPPS MARKET

Respondent

**IN THE MATTER OF AN APPLICATION PURSUANT TO 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**

AFFIDAVIT OF NAVJOT KAUR

I Navjot Kaur of City of Mississauga, in the Province of Ontario, MAKE OATH AND SAY:

1. I am a legal assistant working with Sukhjinder Bhangu, Barrister & Solicitor, lawyer for the Respondents and as such, have knowledge of the matters to which I hereinafter depose.
2. Where I do not have personal information, I have stated the source of my information and do verily believe it to be true.
3. I swear this Affidavit in response to the supplementary Application Record filed by RBC seeking an order to appoint BDO Canada Limited (BDO) as receiver of the assets, undertakings and properties of the Respondents pursuant to section 243 of the Bankruptcy and Insolvency Act and section 101 of Courts of Justice Act and for no other or improper purpose.

4. On July 25, 2024 the honourable court ordered that Mr. DaRe shall provide Mr. Bhangu with a payout statement the same day and Mr. DaRe provided a statement which did not include the costs of BDO, BDO's, BDO's counsel (Aird & Berlis LLP) and RBC's counsel (Fogler Rubinoff LLP) costs in this matter and the costs to reimburse BDO/RBC for the insurance premiums in the interim that had to be paid to maintain insurance coverage on the premises including the amount of \$1,066.61 for July + \$1,056.35 for August totalling \$2,122.96 for the insurance premiums. The statement provided was not a payout statement but a print out of the bank profile of the Respondent.

Copy of the payout statement provided on July 25, 2024 is **Exhibit A** to this Affidavit.

5. On July 25, 2024, Mr. Bhangu requested Mr. DaRe to provide a proper payout statement outlining amounts due as of that day or to confirm that the no other amounts were due as of that day.
6. On July 26, 2024, Mr. DaRe provided a revised payout statement where the following (amongst other charges) additional charges were mentioned:

- Folger, Rubinoff LLP Fee	\$23,048.00
- Folger, Rubinoff LLP Disbursements	\$ 2,213.10
- BDO Professional Fee	\$ 9,300.00
- Insurance Premiums paid by BDO	\$ 2,122.96
- Aid & Berlis LLP fee	\$ 5,941.54

The above amounts are significant amounts and Mr. DaRe did not mention them in the payout statement provided on July 25, 2024.

Copy of revised payout statement provided on July 26, 2024 is **Exhibit B** to this Affidavit.

7. The above additional amounts increased the payout amount from \$946,108.10 (mentioned on the payout statement provided on July 25, 2024) to \$1,006,056.98 in one day.
8. At this time, BDO is not appointed and the cost of BDO and their counsel had increased the payout amount by over 30,000.00. I have been informed by Mr. Bhangu that the respondents are concerned that if BDO is appointed as a receiver for this small business

whose actual amount owing is only \$946,108.10 as of July 25, 2024, the cost of appointment of BDO will make the refinancing impossible and there will be a shortfall at the time of payout.

9. On August 13, 2024, Mr. Bhangu expressed concerns as to how the professional fee of BDO became \$13,000.00 when only one insurance premium payment was made to bring the insurance into good standing. Mr. Bhangu asked Mr. DaRe as to who authorized BDO to jump in without a court order. Mr. DaRe did not Respond to this email.

Copy of the email from Mr. Bhangu to Mr. DaRe is **Exhibit C** to this Affidavit

10. I have ben informed by Mr. Bhangu that the process of refinancing is still ongoing and will take another 2-3 weeks as the lender is waiting for the property to be appraised.

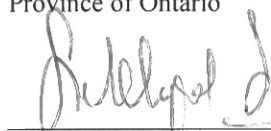
Copy of the email sent by the mortgage broker to the respondents on August 26, 2024 is **Exhibit D** to this Affidavit.

11. I have also been informed by Mr. Bhangu that the Respondents have obtained insurance for the property and that the property is fully insured and there is no need for BDO to intervene and pay insurance premiums.

Copy of the Certificate of Insurance is **Exhibit E** to this Affidavit.

12. I make this Affidavit only to oppose the application for appointment of BDO as a receiver and for no other or improper purpose.

SWORN BEFORE ME
on this 27th day of August, 2024
an the City of Brampton, in the
Province of Ontario



Commissioner, etc.



NAVJOT KAUR

**ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT
OTTAWA**

AFFIDAVIT OF NAVJOT KAUR

**SUKHJINDER BHANGU
Barrister & Solicitor
501-7900 Hurontario Street
Brampton
Ontario L6Y 0P6**

**Tel: 416.883.2437
Fax: 416.883.2436
Email: sb@bhangulawoffice.com
bVlawyer for the Respondents**



Sales Platform

This is Exhibit "A"
to the affidavit of Najat Kaur
sworn before me at Ameyton
on this 27th day of August, 2024

ORVIN IFURUNG

Active Profile: 1000502168 ONTARIO INC. (C)

Find Profile



Add Profile



Organizer



Hide

Overview

[Clear Client Profile](#)

Full View

Indicator:

Identification Word:

Account Manager Name:

SHARON D'COSTA SLAS

Responsibility Transit:

Account Manager:

Profile Information

Legal Name:

1000502168 ONTARIO INC.

Trade Name:

THE KIPPS MARKET

Profile Since:

Current Relationship:

Client Card:

Physical Business Address:

103 COLLEGE ST. W. [Show Map](#)
BELLEVILLE ONTARIO
K8P2G3

Primary Mailing Address:

103 COLLEGE ST W [Show Map](#)
BELLEVILLE ONTARIO
K8P2G3

Primary Phone:

(613) 242-6640

Secondary Phone:

(613) 743-2211

Fax:

Correspondence Language:

English

Date Established:

Business Segmentation Code:

Locations:

Employees:

E-mail (When recording an E-mail address, you must also capture consent in the CASL Lookup tool.)

Primary E-mail Address

thekippsmarket@gmail.com

Owner(s):

Sales Platform

Legal Name	% Owned	Permission
<u>GILL, MANJOT</u>	100	N/D

Royal Bank of Canada Website, © 2013-2015

[Privacy & Security](#) | [Legal](#) | [Accessibility](#)



Account Information

July 22, 2024

1000502168 ONTARIO INC.
THE KIPPS MARKET

Assets

Total Assets: \$1,591.11

Chequing / Savings	Ownership	Overdraft Limit	Balance
[REDACTED]	Sole Owner	0	1,591.11
Total:			\$1,591.11

Investments	Ownership	Maturity Date	Balance
There are no items to be displayed.			

Liabilities

Total Liabilities: \$946,108.10

Credit Cards	Ownership	Limit	Balance
[REDACTED]	Joint or	10,000	0.00
Total:			\$0.00

Loans / Mortgages	Ownership	Insurance Protection			Maturity Date	Balance
		Life	Critical Illness	Disability		
G/GUAR - [REDACTED]	Sole Owner	Ineligible	Ineligible	Call ISC	Jun 1, 2024	0.00
RCL - [REDACTED]	Sole Owner	Ineligible	Ineligible	Call ISC		10,291.43
G/GUAR - [REDACTED]	Sole Owner	Ineligible	Ineligible	Call ISC	Jun 1, 2024	935,074.19
DEMAND - [REDACTED]	Sole Owner	N/A	N/A	N/A		742.48
Total:						\$946,108.10

Additional Services

Account Type	Ownership	Balance
ACR - [REDACTED]	Sole Owner	892,024.19
ACR - [REDACTED]	Sole Owner	0.00
ACR - [REDACTED]	Sole Owner	10,000.00

Account Type	Ownership	Balance
ACR - [REDACTED]	Sole Owner	0.00
ACR - [REDACTED]	Sole Owner	732.45

Please Note:**Royal Mutual Funds**

This Account Information is provided to you for information purposes only and is not an official statement of your balances at Royal Mutual Funds Inc. (RMFI). RMFI cannot verify the accuracy of the balances above relating to products bought or held outside of RMFI and/or its affiliates. Some of the balances shown may be held by RMFI affiliates where they are not covered by the MFDA Investor Protection Corporation (MFDA IPC). Please consult the official statement(s) you receive from RMFI to determine which positions are eligible for protection by the MFDA IPC. Any investments described above may be held with Royal Bank of Canada, Royal Trust Corporation, The Royal Trust Company, Royal Mutual Funds Inc. or RBC Direct Investing Inc., which are separate corporate entities which are affiliated. RMFI is licensed as a financial services firm in the province of Quebec.

RBC Direct Investing

This Account Information is provided to you, at your request, for supplemental information purposes only and is not an official statement of your balances at RBC Direct Investing Inc. ("RBCDI"). Some of the balances shown may be held by RBCDI affiliates where they are not covered by the Canadian Investor Protection Fund ("CIPF"). Please consult the official statement(s) you receive from RBCDI to determine which positions are eligible for protection by the CIPF and/or held in segregation. Any balances described above may be held with Royal Bank of Canada, Royal Trust Corporation of Canada, The Royal Trust Company, Royal Mutual Funds Inc. or RBCDI, which are separate corporate entities which are affiliated. If you notice any discrepancies between the balances shown on the statement(s) you receive from RBCDI and those described above as being with RBCDI, please contact an Investment Services Representative at 1-800-769-2560.

Please Note:**Royal Mutual Funds**

This Account Information is provided to you for information purposes only and is not an official statement of your balances at Royal Mutual Funds Inc. (RMFI). RMFI cannot verify the accuracy of the balances above relating to products bought or held outside of RMFI and/or its affiliates. Some of the balances shown may be held by RMFI affiliates where they are not covered by the MFDA Investor Protection Corporation (MFDA IPC). Please consult the official statement(s) you receive from RMFI to determine which positions are eligible for protection by the MFDA IPC. Any investments described above may be held with Royal Bank of Canada, Royal Trust Corporation, The Royal Trust Company, Royal Mutual Funds Inc. or RBC Direct Investing Inc., which are separate corporate entities which are affiliated. RMFI is licensed as a financial services firm in the province of Quebec.

RBC Direct Investing

This Account Information is provided to you, at your request, for supplemental information purposes only and is not an official statement of your balances at RBC Direct Investing Inc. ("RBCDI"). Some of the balances shown may be held by RBCDI affiliates where they are not covered by the Canadian Investor Protection Fund ("CIPF"). Please consult the official statement(s) you receive from RBCDI to determine which positions are eligible for protection by the CIPF and/or held in segregation. Any balances described above may be held with Royal Bank of Canada, Royal Trust Corporation of Canada, The Royal Trust Company, Royal Mutual Funds Inc. or RBCDI, which are separate corporate entities which are affiliated. If you notice any discrepancies between the balances shown on the statement(s) you receive from RBCDI and those described above as being with RBCDI, please contact an Investment Services Representative at 1-800-769-2560.

Online Branch Banking	
Main Menu	Print Help Exit

Close Inquiry

2024 / 07 / 22

i OLB014I - Reply messages completed

^ - Required Information

Transaction 230 - Close Inquiry

^ Loan Account Number:		Print: <input type="radio"/> Yes <input checked="" type="radio"/> No
^ Loan Number:		
BackDate Code:	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
Effective date (YYYY / MM / DD):	<input type="text"/> / <input type="text"/> / <input type="text"/>	
^ Inquiry Purpose:	Close Inquiry only	
<input type="button" value="Find"/> <input type="button" value="Clear"/>		

Results

Inquiry Type:	CLOSE INQ	Inquiry Date:	JUL 22/24	Inquiry Time:	18:42:51
Loan Account Number - Segment:					
Short Name:	1000502168 ONTA	Deferred Indicator:	N		
Loan Officer Number:		Fees Owning:	0.00		
Loan Description:	ROYAL CR LINE	Uncollected Interest:	218.06		
Status:	RI	Net Capitalization:	218.06		
Inquiry Effective Date:	JUL 22/24	Deferred Income:	0.00		
Outstanding Loan:	10,218.06	Exess Kilometer Charge:	N/A		
Interest to Date:	73.37	Student Interest:	0.00		
Insurance to Date:	0.00	Interest Relief Months:			
Loan Closing Amount:	10,291.43	PSSED:	N/A		
Amort Term Remaining:	N/A				
Per Diem Interest:	2.82				
Payment / Maturity Date:	N/A				

TOP ▲

Close Inquiry

2024 / 07 / 22

i OLB014I - Reply messages completed

^A - Required Information

Transaction 230 - Close Inquiry

^ Loan Account Number:

Print: ☐ Yes ☒ No

[^] **Loan Number:**

BackDate Code:

Effective date (YYYY / MM / DD): / / 

^A Inquiry Purpose: Close Inquiry only

Find

Clear

Results

Number **Messages**

1 **CONVERSION FR SEG 001**

**Inquiry
Type:**

CLOSE INQ

Inquiry Date: JUL 22/24

Inquiry Time: 18:43:11

Loan Account Number - Segment:

Short Name: 1000502168 ONTA

Deferred Indicator:

Loan Officer Number:

Loan Description: GOVERNMENT GUAR

Status: RI

Inquiry Effective Date: JUL 22/24

Outstanding Loan: 892,024.19

Interest to Date: 43,050.00

Insurance to Date: 0.00

Loan Closing Amount: 935,074.19

Amort Term Remaining: 167

Per Diem Interest: 243.17

Payment / Maturity Date: FEB 01/24

Cancel

TOP ▲

Online Branch Banking

[Main Menu](#)[Print](#) | [Help](#) | [Exit](#)

Close Inquiry

2024 / 07 / 22

i OLB014I - Reply messages completed
^ - Required Information

Transaction 230 - Close Inquiry

^ Loan Account Number:

^ Loan Number:

BackDate Code:

☐ ☒

Effective date (YYYY / MM / DD):

/ /

^ Inquiry Purpose:

Close Inquiry only

Print:

☐ Yes

☒ No

Find

Clear

Results

Inquiry Type:

CLOSE INQ

Inquiry Date:

JUL 22/24

Inquiry Time:

18:43:23

Loan Account Number - Segment:

Short Name:

1000502168 O VI

Deferred Indicator:

Loan Officer Number:

Loan Description:

DEMAND LOAN

Status:

RI

Inquiry Effective Date:

JUL 22/24

Outstanding Loan:

732.45

Interest to Date:

10.03

Insurance to Date:

0.00

Loan Closing Amount:

742.48

Amort Term Remaining:

N/A

Per Diem Interest:

0.40

Payment / Maturity Date:

N/A

Cancel

TOP ▲

This is Exhibit "B"
to the affidavit of Nayef Kaur
sworn before me at Brampton
on this 27th day of August, 2024
Shelly J. Kelly

RBC PAYOUT STATEMENT

Re: 1000502168 Ontario Inc. o/a The Kipps Market

AMOUNTS OWING AS OF JULY 25, 2024

Royal Bank of Canada ("RBC")					
Facility	Present balance	Accrued Interest	Prepayment Charge	Per Diem	Total
73701675 002	\$10,218.06	\$81.83	\$0.00	\$2.82	\$10,299.89
73701675 004	\$12,451.02	\$24.07	\$0.00	\$6.82	\$12,475.09
73701675 003	\$892,024.19	\$43,779.50	\$0.00	\$243.17	\$935,803.69*
Fogler, Rubinoff LLP ("FR")					
	Fees	Disbursements	Taxes		Total
	\$23,048.00**	\$2,213.10	\$3,275.51		\$28,536.61***
BDO Canada Limited ("BDO")					
Professional Fees	HST	Travel Expense	Insurance Premiums Paid		Total
\$9,300.00	\$1,209.00	\$368.20	\$2,122.96		\$13,000.16***
Aird & Berlis LLP ("A&B")					
	Total fees up to and including July 25, 2024, including disbursements and taxes				Total
					\$5,941.54***
TOTAL AMOUNT OWING (as of July 25, 2024):					<u>\$1,006,056.98</u>

*The payout amount is subject to change if RBC discovers any error or omission in the calculation of the amount owing and/or if any of the payout values are based on the RBC Royal Bank Prime Lending Rate and that Rate is adjusted in any way between the date of preparation of this payout

statement and the payout date. The payout amount is also subject to change or increase based on the per diem interest set out above to and including the payout date.

**FR provided a courtesy discount of approximately \$2,600.

***The payout amount is subject to change or increase based on any additional, reasonable professional fees and disbursements incurred by FR, BDO and/or A&B after July 25, 2024 in this matter.

Bhangu Law Office

This is Exhibit "C"
to the affidavit of Nargat Devis
sworn before me at Brimley
on this 27 day of August, 2024
Jublyel D

From: Bhangu Law Office
Sent: August 13, 2024 6:40 PM
To: DaRe, Vern W.
Cc: Venton, Scott R.; Ian Aversa (iaversa@airdberlis.com); sparsons@airdberlis.com; Crawley, Peter
Subject: RE: RBC v. 1000502168 Ontario

Good afternoon :

We have reviewed the payout statement and note that BDO has claimed a sum of \$13,000.00. We do not understand what was done by BDO except for making one payment to bring the insurance into good standing. We would also like to know as to who authorized or instructed BDO to jump in and make the payment.

Regards,

Sukhjinder Bhangu

From: DaRe, Vern W. <vdare@foglers.com>
Sent: July 26, 2024 2:11 PM
To: Bhangu Law Office <sb@bhangulawoffice.com>
Cc: Venton, Scott R. <sventon@foglers.com>; Ian Aversa (iaversa@airdberlis.com) <iaversa@airdberlis.com>; sparsons@airdberlis.com; Crawley, Peter <pcrawley@bdo.ca>
Subject: RBC v. 1000502168 Ontario

Please find attached the revised payout statement of RBC in this matter.

Regards,

fogler
rubinoff

Vern W. DaRe
Partner
Fogler, Rubinoff LLP
Lawyers
77 King Street West
Suite 3000, P.O. Box 95
TD Centre North Tower
Toronto, ON M5K 1G8
Direct: 416.941.8842
Main: 416.864.9700
Toll Free: 1.866.861.9700
Fax: 416.941.8852
Email: vdare@foglers.com
foglers.com

From: Bhangu Law Office <sb@bhangulawoffice.com>
Sent: Friday, July 26, 2024 11:42 AM
To: DaRe, Vern W. <vdare@foglers.com>
Cc: Venton, Scott R. <sventon@foglers.com>; Ian Aversa (iaversa@airdberlis.com) <iaversa@airdberlis.com>;

Bhangu Law Office

From: Narinder Gill <gogagill@gmail.com>
Sent: August 26, 2024 8:25 PM
To: Bhangu Law Office
Subject: Fwd: Appraisal delay for Kipps market

Regards,

Narinder

Begin forwarded message:

From: Faisal Zamir <fz1022@yahoo.com>
Date: August 26, 2024 at 8:15:38 PM EDT
To: Narinder Gill <gogagill@gmail.com>
Subject: Appraisal delay for Kipps market
Reply-To: Faisal Zamir <fz1022@yahoo.com>

Hi Narinder,


Hope you are doing well. I just wanted to let you know that there is a bit delay for appraisal. I was told that it will be scheduled very soon and will need about a week or so. I'm giving you the appraisal company name and number where someone will be contacting you and will schedule an In-person appraisal. Please make sure that retainer is paid once it is scheduled. The lender is ready to fund pending appraisal.

Let me know if you have any further questions.

S Rayner & Associates Ltd.
210-920 Princess St Kingston, ON, CA K7L 1H1
613-384-8921

Thank you again,

Faisal

This is Exhibit "D"
to the affidavit of Narinder Gill
sworn before me at Brampton
on this 27th day of August, 2024




TD Insurance

August 26, 2024

This is Exhibit "E"
to the affidavit of Najid Khan
sworn before me at Brampton
on this 27th day of August, 2024
Judeh J. b

TD Insurance
Direct Agency Inc.
101 McNabb Street
2nd Floor
Markham ON L3R 4H8
T: 1-855-724-2883
F: 1-833-354-2523
www.tdinsurance.com

Commercial Property Insurance Confirmation

Property Insured: 103 College St W Belleville ON K8P 2G3, Main Building
Policy No.: 00150848012
Insurer: Security National Insurance Company
Effective Coverage Date: August 26, 2024 through August 26, 2025
Insured(s): The Kipps Market Inc.
Limit of Insurance on Building: \$1,500,000.00
Mortgagee(s):
Royal Bank of Canada
10 York Mills Road
3rd Floor
North York ON M2P 0A2

When there is a Mortgagee mentioned in the Coverage Summary Page(s), the coverage granted is subject to the Insurance Bureau of Canada Standard Mortgage Clause. Any interpretation of coverage is governed by actual policy conditions.

Questions? We're ready for you

You are important to us, and we value you as a customer. If you have any questions or need assistance, please contact us at **1-855-724-2883**. Our offices are open weekdays from 8:00 a.m. to 8:00 p.m. and Saturdays from 9:00 a.m. to 4:00 p.m. We look forward to continuing to serve you.



Certificate of Insurance

Dated: August 26, 2024

This document supersedes any Certificate previously issued under this number.

Agency: TD Insurance Direct Agency Inc.

101 McNabb Street
2nd Floor
Markham, ON L3R 4H8

Insurer: Security National Insurance Company

50 Place Cremazie W.
12th Floor
Montreal, QC H2P 1B6

This is to certify that the Policy(ies) of insurance listed below ("Policy" or "Policies") have been issued to the Named Insured identified below for the period(s) indicated, notwithstanding any requirement, term or condition of any contract or any other document with respect to which this Certificate may be issued or may pertain. This Certificate is issued as a matter of information only and confers no rights upon the Certificate Holder other than those provided by the Policy(ies), and imposes no liability on the Insurer. The insurance coverage afforded by the Policy(ies) listed below is subject to all the terms, conditions and exclusions of such Policy(ies). This Certificate does not amend, extend or alter the coverage afforded by the Policy(ies).

Policy No.: 00150848012

Effective Date (Y-M-D): 2024-08-26
Expiry Date (Y-M-D): 2025-08-26

Insured: The Kipps Market Inc.
103 College St W
Belleville ON K8P 2G3

Certificate Regarding: Variety Store, Convenience Store

Coverage

Limits

Commercial General Liability

Coverage A: Bodily or Mental Injury and Property Damage	Limit (per occurrence)	\$2,000,000
	General Aggregate Limit - Combined Coverage A & B	\$2,000,000
	Products-Completed Operations Hazard Aggregate Limit	\$2,000,000
Coverage B: Personal and Advertising Injury Liability	Limit (per occurrence)	\$2,000,000
	General Aggregate Limit - Combined Coverage A & B	\$2,000,000
Coverage C: Voluntary Payments	Limit (per occurrence)	\$25,000
Coverage D: Tenant's Property Damage Liability	Limit (per occurrence)	\$250,000

Non-Owned Automobile

S.P.F. No. 6 Standard Non-Owned Automobile Policy	Limit (per occurrence)	\$2,000,000
S.E.F. No. 94 Legal Liability for Damage To Hired Automobiles Endorsement	Limit (per occurrence)	\$75,000

Non-Owned Automobile

S.E.F. No. 96 Contractual Liability Endorsement	Included
O.E.F. No. 98B Reduction of Coverage for Lessees or Drivers of Leased Vehicles Endorsement	Included
S.E.F. No. 99 Excluding Long Term Leased Vehicle Endorsement	Included



Alcohol and Gaming Commission of Ontario
90 Sheppard Avenue East, Suite 200
Toronto ON M2N 0A4
Tel.: 416-326-8700
Toll free in Ontario: 1-800-522-2876
Inquiries: www.agco.ca/iagco • Website: www.agco.ca

No.:

CSL1414739

Expiry Date:

Aug. 08, 2025

Convenience Store Licence (Licence to Operate a Retail Store)

Issued under the *Liquor Licence and Control Act, 2019*

Issued to 1000502168 Ontario Inc

Issue Date Aug. 09, 2024

**Doing
Business As** The Kipps Market

Address 103 COLLEGE ST W
BELLEVILLE, ON K8P2G3

This document must be posted in a conspicuous place.
Not transferable without approval of the Registrar.



ROYAL BANK OF CANADA

Applicant

-and-

1000502168 ONTARIO INC. operating as THE KIPPS
MARKET

Respondent

Court File No. CV-24-00096443-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**
PROCEEDING COMMENCED AT
OTTAWA

AFFIDAVIT OF NAVJOT KAUR

**SUKHJINDER BHANGU
Barrister & Solicitor**
501-7900 Hurontario Street
Brampton
Ontario L6Y 0P6

Tel: 416.883.2437
Fax: 416.883.2436
Email: sb@bhangulawoffice.com
Lawyer for the Respondents