

**ONTARIO
SUPERIOR COURT OF JUSTICE
(IN BANKRUPTCY AND INSOLVENCY)**

**IN THE MATTER OF *THE BANKRUPTCY AND INSOLVENCY ACT*, R.S.C. 1985, c. B-3, AS
AMENDED**

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF B.R.'S
PLUMBING & HEATING INC., A CORPORATION INCORPORATED UNDER THE LAWS OF
ONTARIO**

**MOTION RECORD OF PLAINTIFF
(Returnable May 1, 2026)**

April 27, 2026

HARRISON PENZA LLP

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Solicitors for B.R.'s Plumbing & Heating Inc.

INDEX

INDEX

Tab	Document	Page No.
1	Notice of Motion dated April 27, 2026	5
	Schedule "A" – Draft Order	10
2	Affidavit of Bart Rietveld sworn April 27, 2026	14
	Exhibit "A" - Notice of Intention to Make a Proposal	18

Tab 1

**ONTARIO
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NOTICE OF MOTION

THE MOVING PARTY, B.R.'s Plumbing & Heating Inc. ("**BR's**") will make a motion to an associate judge.

PROPOSED METHOD OF HEARING: The Motion is to be heard:

In writing under subrule 37.12.1 (1) because it is (*insert one of on consent, unopposed or made without notice*);

In writing as an opposed motion under subrule 37.12.1 (4);

In person;

By telephone conference;

By video conference.

at the following location:

On Friday, May 1, 2025 at 10:00a.m., by the court or as soon after that time as the Motion can be heard by judicial teleconference via Zoom at London, Ontario, video conference details to be provided prior.

THE MOTION IS FOR:

1. An order substantially in the form attached hereto at Schedule "A" (the "**Draft Order**"), *inter alia*:

- a. extending the time for the Applicant to file a proposal under the *BIA* (as defined below) and the corresponding stay of proceedings to and including June 24, 2026;
2. Such further and other relief as counsel may request and this Honourable Court may permit

THE GROUNDS FOR THE MOTION ARE:

Background

3. The Applicant is a privately held corporation incorporated under the *Business Corporations Act* (Ontario), R.S.O. 1990, c. B.16 and headquartered in Tillsonburg, Ontario.
4. The Applicant's business is a plumbing and heating business.
5. The Applicant has had cash flow issues, and requires protection from its creditors to avoid the immediate cessation of its business.
6. The Applicant filed a notice of intention to make a proposal (the "**NOI**") on April 10, 2026 pursuant to section 50.4 of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended (the "**BIA**"). BDO Canada Limited was appointed as the proposal trustee under the NOI (in such capacity, the "**Proposal Trustee**").
7. The Applicant believes that these NOI proceedings is in the best interests of its stakeholders.

The Stay Extension

8. The time for the Applicant to file a proposal and the corresponding stay of proceedings expires on May 10, 2026.
9. The Applicant is now seeking a further 45-day extension of the stay of proceedings to June 24, 2026 (the "**Stay Extension**").

10. The Stay Extension is necessary in order to allow the Applicant to, among other things, conduct a sales process and seek the granting of the AVO on or before June 24, 2026.
11. The Applicant has acted, and continues to act, in good faith and with due diligence in formulating a plan that would yield the greatest recovery for its stakeholders.
12. The Proposal Trustee supports the granting of the Stay Extension, and together with the Applicant, are of the view that no creditor will be materially prejudiced if it is granted.
13. No creditor opposes the granting of the Stay Extension.

THE GROUNDS FOR THE MOTION ARE:

14. The provisions of the *BIA*, including sections 50.4, 62(1), 65.13 and 69, and the inherent and equitable jurisdiction of this Honourable Court.
15. Rules 1.04, 1.05, 2.03, 3.02, 37, and 39 of the Ontario *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194.
16. Such further and other grounds as counsel may advise and this Honourable Court may permit.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:

1. The Affidavit of Brian Velthove sworn April 27, 2026;
2. The First Report of the Proposal Trustee to be filed; and,

3. Such materials as counsel may advise and this Honourable Court may permit.

April 27, 2026

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Solicitors for B.R.'s Plumbing &
Heating Inc.

To: Service List

SCHEDULE "A"

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF B.R.'S PLUMBING & HEATING INC., A CORPORATION INCORPORATED UNDER THE LAWS OF ONTARIO

Court File No. 35-3358238

ONTARIO
COURT OF JUSTICE
IN BANKRUPTCY AND INSOLVENCY

PROCEEDING COMMENCED AT
LONDON, ONTARIO

ORDER

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**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF B.R.'S PLUMBING & HEATING INC., A
CORPORATION INCORPORATED UNDER THE LAWS OF ONTARIO**

Court File No. 35-3358238

**ONTARIO
SUPERIOR COURT OF JUSTICE
(IN BANKRUPTCY AND INSOLVENCY)**

PROCEEDING COMMENCED AT
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NOTICE OF MOTION

HARRISON PENZA LLP

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Lawyers for B.R.'s Plumbing & Heating Inc.

Tab 2

Court File No. 35-3358238

**ONTARIO
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AFFIDAVIT OF BART RIETVELD

(Sworn April 27, 2026)

I, Bart Rietveld, of the Town of Otterville, in the Province of Ontario, **MAKE OATH**

AND SAY:


1. I am a shareholder of B.R.'s Plumbing & Heating Inc. ("**BR's**"), and as such have knowledge of the matters to which I hereinafter depose. Unless I indicate to the contrary these matters are within my own knowledge and are true. Where I have indicated that I have obtained facts from other sources, I have identified the source and I believe those facts to be true.
2. The majority shareholder of BR's is MechCan Inc. ("**MechCan**"). On April 1, 2026, MechCan filed a notice of intention to make a proposal pursuant to section 50.4 of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended (the "**BIA**").
3. As a result of MechCan's filing, on April 10, 2026, BR's filed a notice of intention to make a proposal (the "**NOI**") pursuant to section 50.4 of the *BIA*. BDO Canada Limited was appointed as the proposal trustee under the NOI (in such capacity, the "**Proposal Trustee**"). Attached hereto and marked as **Exhibit "A"** is a true copy of the NOI.
4. The time for BR's to file a proposal and the corresponding stay of proceedings expires on May 10, 2026.

5. BR's requires additional time to finalize arrangements to sell the assets of the company and seeks to extend the stay for 45 days to June 24, 2026 pursuant to the provisions of the *BIA*.
6. I make this Affidavit in support of an order for the extension of the stay of proceedings and for no other or improper purpose.

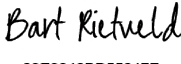
Sworn or Affirmed before me: in person OR by video conference

by Bart Rietveld of the Town of Otterville in the Province of Ontario, before me at the City of London in the Province of Ontario, on April 27, 2026 in accordance with [O. Reg. 431/20](#), Administering Oath or Declaration Remotely.

Commissioner for Taking Affidavits (*or as may be*)

DocuSigned by:

93810FB7C36A4F1...

Signature of Commissioner (or as may be)

DocuSigned by:

29E9348BD55847F...

Bart Rietveld

Court File No. 35-3358238

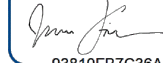
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ATTACHED HERETO ARE EXHIBIT "A"
AS REFERRED TO IN THE AFFIDAVIT OF BART RIETVELD,
SWORN BEFORE ME BY VIDEOCONFERENCE APRIL 27, 2026.

DocuSigned by:



93810FB7C36A4F1...

A Commissioner, etc.

EXHIBIT "A"



Industry Canada
**Office of the Superintendent
of Bankruptcy Canada**

Industrie Canada
**Bureau du surintendant
des faillites Canada**

District of: Ontario
Division No.: 05 - London
Court No.: 35-3358238
Estate No.: 35-3358238

In the Matter of the Notice of Intention to make a proposal of:

B.R.'s Plumbing & Heating Inc.

Insolvent Person

BDO CANADA LIMITED / BDO CANADA LIMITÉE

Licensed Insolvency Trustee

Date of the Notice of Intention:

April 10, 2026

CERTIFICATE OF FILING OF A NOTICE OF INTENTION TO MAKE A PROPOSAL
Subsection 50.4 (1)

I, the undersigned, Official Receiver in and for this bankruptcy district, do hereby certify that the aforementioned insolvent person filed a Notice of Intention to Make a Proposal under subsection 50.4 (1) of the Bankruptcy and Insolvency Act;

Pursuant to subsection 69. (1) of the Act, all proceedings against the aforementioned insolvent person are stayed as of the date of filing of the Notice of Intention.

Date: April 10, 2026, 15:11

E-File/Dépôt Electronique

Official Receiver

Federal Building - London, 451 Talbot Street, Suite 303, London, Ontario, Canada, N6A5C9, (877)376-9902

Canada

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