Court File No.: CV-24-00722104-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
(Commercial List)

B E T W E E N:

STOKE CANADA FINANCE CORP.

Applicant

And

GREENSEAL CANNABIS COMPANY LTD., ATLAS GLOBAL BRANDS INC.

Respondents

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

AFFIDAVIT OF CHRISTEL PAUL
(Sworn June 27, 2024)

I, CHRISTEL PAUL of the city of Toronto, Ontario, **MAKE OATH AND SAY AS FOLLOWS**:

1. I am the Manager of Operations at Reconstruct LLP, as such, I have personal knowledge of the matters to which I hereinafter depose. Where I do not have personal knowledge of the matters set out herein, I have stated the source of my information and in all such cases believe it to be true.

2. Attached as **Exhibit "A"** is a true copy of a letter from Ms. Caitlin Fell of Reconstruct LLP, counsel to Stoke Canada Finance Corp. ("**Stoke**"), dated Monday June 24, 2024, to Mr. Trevor Courtis of McCarthy Tétrault LLP as counsel to Ernst & Young Inc. in its capacity as monitor of the Applicants (the "**Monitor**").

3. Attached as **Exhibit "B"** is a true copy of email correspondence from Ms. Caitlin Fell of

Reconstruct LLP, counsel to Stoke, dated Monday June 24, 2024, to Ms. Mary Paterson of Osler, Hoskin & Harcourt LLP, counsel to the Applicants.

4. Attached as **Exhibit "C"** is a true copy of a letter from Mr. Randal Van Mosselaer of Osler, Hoskin & Harcourt LLP, counsel to the Applicants, dated Monday June 24, 2024, to Mr. Trevor Courtis of McCarthy Tétrault LLP as counsel to Ernst & Young Inc. in its capacity as Monitor.

5. Attached as **Exhibit "D"** is a true copy of an email from Mr. R. Brendan Bissell of Reconstruct LLP, counsel to Stoke dated Monday June 24, 2024, to Mr. Trevor Courtis of McCarthy Tétrault LLP as counsel to Ernst & Young Inc. in its capacity as Monitor.

6. Attached as **Exhibit "E"** is a true copy of email correspondence from Ms. Caitlin Fell of Reconstruct LLP, counsel to Stoke dated Tuesday June 25, 2024, to Ms. Mary Paterson of Osler, Hoskin & Harcourt LLP, counsel to the Applicants.

7. Attached as **Exhibit "F"** is a true copy of email correspondence from Ms. Caitlin Fell of Reconstruct LLP, counsel to Stoke, dated Wednesday June 26, 2024 to Mr. Trevor Courtis, counsel to the Monitor.

8. Attached as **Exhibit "G"** is a true copy of email correspondence from Ms. Caitlin Fell of Reconstruct LLP, counsel to Stoke, dated Thursday June 27, 2024, at 7:15 AM to Mr. Trevor Courtis, counsel to the Monitor.

9. I am advised by Ms. Fell and Mr. Bissell that, as of 10:00am on June 27 when this affidavit was sworn, they received no responses from counsel for the Applicants or from counsel for the Monitor to the correspondence noted above.

10. This affidavit is made in support of the within application for the appointment of PwC as Receiver and for no other or improper purpose.

SWORN BEFORE ME at the City of Toronto, in the Province of Ontario, on 27th day of June 2024.	))))	
DocuSigned by: Levi Rivers BA31FCEA83114AC...	)))	DocuSigned by: Christel Paul 42BF8678EF6E4AB...
A Commissioner for taking Affidavits.	)	**CHRISTEL PAUL**

Levi Rivers, a Commissioner, etc, Province of Ontario, for Reconstruct LLP, Barristers & Solicitors.
Expires: Aug 22, 2025

THIS IS **EXHIBIT "A"** REFERRED TO IN THE
AFFIDAVIT OF CHRISTEL PAUL SWORN BEFORE ME,
THIS 27TH DAY OF JUNE 2024

DocuSigned by:

Levi Rivers

BA31FCEA83114AC...

A COMMISSIONER FOR TAKING AFFIDAVITS

RECON
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Partner
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M: +1.416.258.5843
F: +1.416.613.8290
E: cfell@reconllp.com
W: reconllp.com

June 24, 2024

VIA ELECTRONIC MAIL

MCCARTHY TETRAULT LLP
66 Wellington Street West
Suite 5300, TD Bank Tower Box 48
Toronto ON M5K 1E6
Canada

Attention: Mr. Trevor Courtis

Dear Mr. Courtis,

RE: GreenSeal Cannabis Company Ltd.

As you are aware, we are counsel to Stoke Canada Finance Corp.(“**Stoke**”).

On June 20, 2024, GreenSeal Cannabis Company, Ltd. (“**GreenSeal**”) including, *inter alia*, its affiliates Atlas Global Brands Inc. (“**Atlas**”), AgMedica Bioscience Inc. (“**AgMedica**”), and GreenSeal Nursery, Ltd. (collectively, the “**Applicants**”) sought and obtained an initial 7 day order (the “**Initial Order**”) under the *Companies’ Creditors Arrangement Act* (the “**CCAA**”) and pursuant to the Initial Order, Ernst & Young Inc. (“**EY**”) was appointed as monitor over the Applicants (in such capacity, the “**Monitor**”).

The Stoke Receivables

As part of the Initial Order, the Ontario Superior Court of Justice (Commercial List) granted several court-ordered charges over the assets, property and undertakings of the Applicants, including an Administration Charge, a Directors’ Charge and an Intercompany Charge (each as defined in the Initial Order and collectively, the “**Charges**”).

As you have been made aware, our client takes the position that all receivables of GreenSeal purchased by Stoke (the “**Stoke Receivables**”) pursuant to the Receivables Purchase Agreement dated June 7, 2023 (as amended or modified from time to time, the “**Receivables Purchase Agreement**”) constitute the sole property of Stoke. Furthermore, under the Receivables Purchase Agreement, GreenSeal is among other things required to:

- deposit any proceeds on account of the Stoke Receivables into the Purchaser’s Bank Account (as defined in the Receivables Purchase Agreement); and
- in the event that Stoke Receivables are not deposited into the Purchaser’s Bank Account, to forthwith transfer the proceeds from GreenSeal’s bank account to the Purchaser’s

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Bank Account, and until such transfer has occurred, hold in trust for Stoke all proceeds on account of Stoke Receivables.

In that vein, can the Monitor please confirm that: (i) from and after the date of the Initial Order, all Stoke Receivables have been treated in accordance with the aforementioned restrictions, in accordance with the Receivables Purchase Agreement, and have not been used by the Applicants, including to pay the legal fees of the Applicants or the Monitor and its counsel; and (ii) that the Monitor shall monitor and oversee the deposit by the Applicants of all Stoke Receivables obtained from and after the date of the Initial Order into the Purchaser's Bank Account.

Separately, because the Stoke Receivables do not form part of the assets or property of the Applicants, our client takes the position that the Stoke Receivables do not form any part of the assets subject to the Charges.

EY as Monitor of GreenSeal

Our client has had the opportunity to fully review the Application Record of the Applicants filed in connection with the CCAA proceedings, and in particular, the following facts submitted as evidence therein:

- that EY was appointed as receiver over the assets of certain affiliates of the Applicants (the "**Receivership Affiliates**"). In its capacity as receiver of the Receivership Affiliates, EY filed a statement of claim against GreenSeal in the Court of King's Bench for products allegedly purchased by GreenSeal from the Receivership Affiliates.

- Trent Henry, the Global Vice Chair of EY and the brother of a director and shareholder of the Applicants, Trevor Henry, is named in a Statement of Claim filed by McPhee Investments Ltd., along with AgMedica Biocience Inc. and Trevor Henry personally (the "**Statement of Claim**") alleging, *inter alia*, gross negligence, willful misconduct and breach of fiduciary duty. The Statement of Claim alleges that during the CCAA process of AgMedica commenced in 2020, key individuals of AgMedica including Trevor Henry carried out the process while subject to an undisclosed and profound conflict of interest as a result of his relationship with EY's Global Vice Chair- Trent Henry. More particularly, the Statement of Claim alleges that:

    - Trevor Henry was a long-time director and executive of AgMedica;

    - Trent Henry of EY held shares in AgMedica;

    - EY as Monitor of AgMedica at the time, did not disclose that Trent Henry as a national executive possessed a significant personal interest in AgMedica;

    - the CCAA process was used to eliminate the equity rights of all shareholders at the time, but simultaneously provided new equity by way

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of Class A preferred shares to, *inter alia*, Trent Henry and Trevor Henry and these individuals or their family collectively owned or own nearly half of the Class A preferred shares of restructured Agmedica; and

- That the defendants conspired together, and with EY as monitor, to benefit themselves and a small number of shareholders—namely Trevor and Trent Henry.

Given these serious allegations, our client has a few questions of the Monitor:

1) Is EY owed any pre-filing amounts from the Applicants other than in respect to the newly commenced 2024 CCAA proceedings? If so, how much is owed and what do the amounts relate to?

2) Has Trent Henry advised or participated in any way in the process leading up to the Applicants' 2024 CCAA filing (including but not limited to by way of phone calls, meetings or email correspondence)?

3) Does Trent Henry hold any equity or debt interest in Atlas or the Applicants generally?

While Stoke accepts that the Statement of Claim contain allegations not yet proven, and does not impugn the integrity of EY, the aforementioned allegations, including the claim of EY against GreenSeal as receiver of the Receivership Affiliates is concerning and may create a perception of a lack of impartiality and neutrality required of a court-appointed Monitor.

We look forward to hearing from you.

.

Yours truly,

RECONSTRUCT LLP

Caitlin Fell
CF/lr
Cc: Brendon Bissell
Mary Patterson

THIS IS **EXHIBIT "B"** REFERRED TO IN THE
AFFIDAVIT OF CHRISTEL PAUL SWORN BEFORE ME,
THIS 27TH DAY OF JUNE 2024

DocuSigned by:

Levi Rivers

BA31FCEA83114AC...

A COMMISSIONER FOR TAKING AFFIDAVITS

Levi Rivers

From: Caitlin Fell
Sent: Thursday, June 27, 2024 8:31 AM
To: Jared Rosenbaum
Cc: R. Brendan Bissell
Subject: FW: Agmedica/ Greenseal

Follow Up Flag: Follow up
Flag Status: Flagged

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C |416.258.5843
E |cfell@reconllp.com

Reconstruct LLP | Restructuring and Litigation Lawyers
120 Adelaide Street West | Suite 2500 |Toronto ON M5H 1T1

From: Caitlin Fell
Sent: Monday, June 24, 2024 4:19 PM
To: Paterson, Mary <MPaterson@osler.com>; Alex Morrison <Alex.F.Morrison@parthenon.ey.com>
Cc: Karen.K.Fung@parthenon.ey.com; tcourtis@mccarthy.ca; Kanji, Justin <jkanji@osler.com>; D. J. Miller <DJMiller@tgf.ca>
Subject: Agmedica/ Greenseal

Hi Mary,

Hope you were able to enjoy a little time on the weekend.
Just wondering if there were revised cash flows and if so, can you circulate them?

Many Thanks

Caitlin

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THIS IS **EXHIBIT "C"** REFERRED TO IN THE
AFFIDAVIT OF CHRISTEL PAUL SWORN BEFORE ME,
THIS 27TH DAY OF JUNE 2024

DocuSigned by:

Levi Rivers

BA31FCEA83114AC...

A COMMISSIONER FOR TAKING AFFIDAVITS

Osler, Hoskin & Harcourt LLP
Suite 2700, Brookfield Place
225 - 6th Avenue S.W.
Calgary, Alberta, Canada T2P 1N2
403.260.7000 MAIN
406.260.7024 FACSIMILE

OSLER

Calgary
Toronto
Montréal
Ottawa
Vancouver
New York

June 24, 2024

Randal Van de Mosselaer
Partner
Direct Dial: 403.260.7060
rvandemosselaer@osler.com
Our Matter Number: 1257768

Sent By Electronic Mail (tcourtis@mccarthy.ca)

McCarthy Tétrault LLP
66 Wellington Street West
Suite 5300, TD Bank Tower Box 48
Toronto ON M5K 1E6

Attention: Trevor Courtis

Dear Mr. Courtis:

Re: **In the matter of the Companies' Creditors Arrangement Act, R.S.C. 1985, C. C-36, As Amended and in the matter of a Plan of Compromise or Arrangement of Atlas Global Brands Inc., GreenSeal Cannabis Company, Ltd., GreenSeal Nursery, Ltd., AgMedica Bioscience Inc., Wellworth Health Corp., 5047346 Ontario Inc., 8050678 Canada Inc. And Tavivat Naturals Inc. Court File No. CV-24-00722386-00CL**

As you know, we are counsel to the Applicants in the captioned CCAA proceedings. We write in response to the letter from Reconstruct LLP dated today's date (the "Recon Letter") addressed to your office, a copy of which is enclosed herewith. Capitalized terms used in this letter and not otherwise defined shall have the same meaning as given to them in the Recon Letter.

We write specifically in response to the matters raised in the Recon Letter under the heading "The Stoke Receivables", and take issue with much of what is asserted therein. In particular, we disagree with the bald assertion that "all receivables of GreenSeal purchased by Stoke . . . pursuant to the Receivables Purchase Agreement dated June 7, 2023. . . constitute the sole property of Stoke." On the contrary, it is clear from Article 6 of the Receivables Purchase Agreement that Stoke's interest in all receivables of GreenSeal is simply a security interest, within the meaning of the Personal Property Security Act (British Columbia), RSBC 1996, c. 359. (Note that pursuant to Article 9.7 the Receivables Purchase Agreement is governed by the laws of British Columbia.)

OSLER

As for the balance of the matters raised in that section of the letter, we can confirm that the Applicants we will maintain the pre-filing *status quo* and will comply with all of their obligations under the CCAA, the Initial Order, and all other applicable court orders, all while under the supervision of the Monitor. We deny that any of the relief being requested by Stoke's counsel in the Recon Letter is appropriate or necessary.

Yours truly,

Randal Van de Mosselaer

RVM:ep

c: Caitlin Fell, *Reconstruct LLP* (cfell@reconllp.com)
Mary Paterson, *Osler, Hoskin & Harcourt LLP* (mpaterson@osler.com)
Joanna Cameron, *Osler, Hoskin & Harcourt LLP* (jcameron@osler.com)
Applicants

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F: +1.416.613.8290
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W: reconllp.com

June 24, 2024

VIA ELECTRONIC MAIL

MCCARTHY TETRAULT LLP
66 Wellington Street West
Suite 5300, TD Bank Tower Box 48
Toronto ON M5K 1E6
Canada

Attention: Mr. Trevor Courtis

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RECONSTRUCT LLP

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In that vein, can the Monitor please confirm that: (i) from and after the date of the Initial Order, all Stoke Receivables have been treated in accordance with the aforementioned restrictions, in accordance with the Receivables Purchase Agreement, and have not been used by the Applicants, including to pay the legal fees of the Applicants or the Monitor and its counsel; and (ii) that the Monitor shall monitor and oversee the deposit by the Applicants of all Stoke Receivables obtained from and after the date of the Initial Order into the Purchaser's Bank Account.

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    - Trevor Henry was a long-time director and executive of AgMedica;

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    - EY as Monitor of AgMedica at the time, did not disclose that Trent Henry as a national executive possessed a significant personal interest in AgMedica;

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- That the defendants conspired together, and with EY as monitor, to benefit themselves and a small number of shareholders—namely Trevor and Trent Henry.

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We look forward to hearing from you.

.

Yours truly,

RECONSTRUCT LLP

Caitlin Fell
CF/lr
Cc: Brendon Bissell
Mary Patterson

THIS IS **EXHIBIT "D"** REFERRED TO IN THE
AFFIDAVIT OF CHRISTEL PAUL SWORN BEFORE ME,
THIS 27TH DAY OF JUNE 2024

DocuSigned by:

Levi Rivers

BA31FCEA83114AC

A COMMISSIONER FOR TAKING AFFIDAVITS

Levi Rivers

From:	Jared Rosenbaum
Sent:	Thursday, June 27, 2024 9:16 AM
To:	Christel Paul; Levi Rivers
Subject:	FW: In the matter of Atlas Global Brands Inc. et al // Court File No. CV-24-00722386-00CL

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Jared Rosenbaum
Senior Associate
T |416-613-8284
C |647-973-2704
E |jrosenbaum@reconllp.com

Reconstruct LLP | Restructuring and Litigation Lawyers
120 Adelaide Street West | Suite 2500 |Toronto ON M5H 1T1

From: R. Brendan Bissell <bbissell@reconllp.com>
Sent: Monday, June 24, 2024 4:31 PM
To: Courtis, Trevor <tcourtis@mccarthy.ca>
Cc: Caitlin Fell <cfell@reconllp.com>; Paterson, Mary <MPaterson@osler.com>; Cameron, Joanna <jcameron@osler.com>; Van de Mosselaer, Randal <rvandemosselaer@osler.com>; Jared Rosenbaum <jrosenbaum@reconllp.com>
Subject: RE: In the matter of Atlas Global Brands Inc. et al // Court File No. CV-24-00722386-00CL

Trevor: I'm writing in response to Randal's letter.

We dispute the assertion in that letter that Stoke's interest in the receivables that it purchased is simply a security interest under s. 6 of the Purchase Receivables Agreement. Indeed, while s. 6 does grant a security interest, it is for other obligations of the borrower to Stoke. The agreement speaks directly to the purchased receivables in section 3.4 as follows:

> It is the intention of the Purchaser and the Seller that (a) the sales pursuant to Section 3.1 constitute an absolute sale of the Purchased Receivables, conveying good title free and clear of any lien, from the Seller to the Purchaser and are not intended, nor should be construed as, a loan or an assignment by way of security, and (b) the Purchased Receivables not be a part of the Seller's estate in the event of an Insolvency Event with respect to the Seller. (emphasis added)

The more problematic part of that letter is the suggestion that the debtors will maintain the pre-filing *status quo*. The record is rather clear that the debtors deviated from their obligations to remit funds collected in respect of receivables purchased by Stoke (or the 50% of them that the debtors did not permit CRA to seize under a RTP) before the filing. Any suggestion that the debtors are going to cointinue on this manner of dealing without first having obtained direction from the Court on the ownership interest claimed by Stoke is wholly inappropriate. Please confirm that the Monitor will require the debtors to set aside any such funds pending judicial determination.

Regards,

RECON RECONSTRUCT LLP

R. Brendan Bissell
Partner
T |416.613.0066
C |416-992-4979
E |bbissell@reconllp.com

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120 Adelaide Street West | Suite 2500 |Toronto ON M5H 1T1

From: Pratt, Elena <EPratt@osler.com>
Sent: Monday, June 24, 2024 12:17 PM
To: tcourtis@mccarthy.ca
Cc: Caitlin Fell <cfell@reconllp.com>; Paterson, Mary <MPaterson@osler.com>; Cameron, Joanna <jcameron@osler.com>; Van de Mosselaer, Randal <rvandemosselaer@osler.com>; bernie@atlasglobalbrands.com; Jason@Atlasglobalbrands.com
Subject: In the matter of Atlas Global Brands Inc. et al // Court File No. CV-24-00722386-00CL

Mr. Courtis,

Please see the attached correspondence of today's date.

Regards,

OSLER

Elena Pratt
Legal Assistant to Randal S. Van de Mosselaer, Emily Paplawski and Julie Treleaven.
403.592.7269 | EPratt@osler.com

Osler, Hoskin & Harcourt LLP
Suite 2700, Brookfield Place
225 – 6th Avenue S.W.
Calgary, Alberta, Canada T2P 1N2

osler.com

THIS IS **EXHIBIT "E"** REFERRED TO IN THE
AFFIDAVIT OF CHRISTEL PAUL SWORN BEFORE ME,
THIS 27TH DAY OF JUNE 2024

DocuSigned by:

Levi Rivers

BA31FCEA83114AC...

A COMMISSIONER FOR TAKING AFFIDAVITS

Levi Rivers

From: Caitlin Fell
Sent: Thursday, June 27, 2024 8:32 AM
To: Jared Rosenbaum
Cc: R. Brendan Bissell
Subject: FW: Agmedica/ Greenseal

Follow Up Flag: Follow up
Flag Status: Flagged

RECON RECONSTRUCT LLP
Caitlin Fell
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120 Adelaide Street West | Suite 2500 |Toronto ON M5H 1T1

From: Caitlin Fell <cfell@reconllp.com>
Sent: Tuesday, June 25, 2024 12:10 PM
To: Paterson, Mary <MPaterson@osler.com>; Alex Morrison <Alex.F.Morrison@parthenon.ey.com>
Cc: Karen.K.Fung@parthenon.ey.com; tcourtis@mccarthy.ca; Kanji, Justin <jkanji@osler.com>; Leanne Williams <LWilliams@tgf.ca>; R. Brendan Bissell <bbissell@reconllp.com>; Jared Rosenbaum <jrosenbaum@reconllp.com>; D. J. Miller <DJMiller@tgf.ca>
Subject: Re: Agmedica/ Greenseal

Hi Mary

Following up on this. Can you advise on timing?

Best,

Caitlin

RECON RECONSTRUCT LLP
Caitlin Fell
Partner
T |416.613.8282
C |416.258.5843
E |cfell@reconllp.com

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From: Caitlin Fell
Sent: Monday, June 24, 2024 4:19 PM
To: Paterson, Mary <MPaterson@osler.com>; Alex Morrison <Alex.F.Morrison@parthenon.ey.com>
Cc: Karen.K.Fung@parthenon.ey.com <Karen.K.Fung@parthenon.ey.com>; tcourtis@mccarthy.ca <TCOURTIS@mccarthy.ca>; Kanji, Justin <jkanji@osler.com>; D. J. Miller <DJMiller@tgf.ca>
Subject: Agmedica/ Greenseal

Hi Mary,

Hope you were able to enjoy a little time on the weekend.
Just wondering if there were revised cash flows and if so, can you circulate them?

Many Thanks

Caitlin

RECON
RECONSTRUCT LLP

Caitlin Fell
Partner
T |416.613.8282
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THIS IS **EXHIBIT "F"** REFERRED TO IN THE
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THIS 27TH DAY OF JUNE 2024

DocuSigned by:
Levi Rivers
BA31FCEA83114AC...

A COMMISSIONER FOR TAKING AFFIDAVITS

Levi Rivers

From:	Caitlin Fell
Sent:	Thursday, June 27, 2024 8:54 AM
To:	Jared Rosenbaum
Subject:	FW: Atlas
Follow Up Flag:	Follow up
Flag Status:	Flagged

Caitlin Fell
Partner
T |416.613.8282
C |416.258.5843
E |cfell@reconllp.com

Reconstruct LLP | Restructuring and Litigation Lawyers
120 Adelaide Street West | Suite 2500 |Toronto ON M5H 1T1

From: Caitlin Fell <cfell@reconllp.com>
Sent: Wednesday, June 26, 2024 5:10 PM
To: Trevor Courtis <TCOURTIS@mccarthy.ca>
Cc: R. Brendan Bissell <bbissell@reconllp.com>
Subject: Atlas

Hey Trevor. Just tried to call you. What's going on with Atlas. It's been crickets today.

C

Caitlin Fell
Partner
T |416.613.8282
C |416.258.5843
E |cfell@reconllp.com

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THIS IS **EXHIBIT "G"** REFERRED TO IN THE
AFFIDAVIT OF CHRISTEL PAUL SWORN BEFORE ME,
THIS 27TH DAY OF JUNE 2024

Levi Rivers

A COMMISSIONER FOR TAKING AFFIDAVITS

Levi Rivers

From:	Caitlin Fell
Sent:	Thursday, June 27, 2024 8:32 AM
To:	Jared Rosenbaum
Cc:	R. Brendan Bissell
Subject:	FW: Atlas Global Brand Inc. et al-CV-24-00722386-00CL
Follow Up Flag:	Follow up
Flag Status:	Flagged

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From: Caitlin Fell <cfell@reconllp.com>
Sent: Thursday, June 27, 2024 7:15 AM
To: tcourtis@mccarthy.ca
Cc: Alex Morrison <Alex.F.Morrison@parthenon.ey.com>; Paterson, Mary <MPaterson@osler.com>; R. Brendan Bissell <bbissell@reconllp.com>; Jared Rosenbaum <jrosenbaum@reconllp.com>
Subject: Re: Atlas Global Brand Inc. et al-CV-24-00722386-00CL

Hi Trevor- I don't believe we received a response back from the Monitor on this letter. Can you advise?

Sent from my iPad

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On Jun 24, 2024, at 7:57 AM, Caitlin Fell <cfell@reconllp.com> wrote:

Please see attached correspondence of today's date.

Best,

Caitlin

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<LT to EY (Monitor) 23.06.24.pdf>

[illegible] CANADA FINANCE CORP. 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

Court File No. CV-24-00722104-00CL

Applicant

ONTARIO
SUPERIOR COURT OF JUSTICE
(IN BANKRUPTCY AND INSOLVENCY)

Proceedings commenced at Toronto

AFFIDAVIT OF CHRISTEL PAUL
(sworn June 27, 2024)

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