



Sanjeev Mitra
Direct: 416.865.3085
E-mail: smitra@airdberlis.com

July 15, 2024

DELIVERED BY REGULAR AND REGISTERED MAIL

Susan Moore
10 Flaherty Lane,
Caledon ON L7K 2P3

Dear Ms. Moore

Re: Royal Bank of Canada (“RBC”) loans to Moore Brothers Transport Ltd. (the “Debtor”) as guaranteed by each of Gary Moore, Ronald Moore and Susan Moore (each a “Guarantor”)

We are the lawyers for RBC in connection with its lending arrangements with the Debtor.

The Debtor is indebted to RBC with respect to, *inter alia*, certain credit facilities (the “**Credit Facilities**”) made available by RBC to the Debtor, pursuant to and under the terms of: (i) a credit agreement between RBC and the Debtor dated May 29, 2023, as amended by amending agreements dated July 17, 2023 and February 20, 2024 (the “**Primary Credit Agreement**”); and (ii) a Master Lease Agreement dated February 17, 2016 (together with the Primary Credit Agreement, the “**Credit Agreements**”).

Certain events of default have occurred under the Credit Agreements and RBC has made formal demand for repayment of amounts owed under the Credit Agreements by the Debtor. As of July 10, 2024, the amount owed by the Debtor to RBC is \$3,507,269.95, which is broken down as follows:

Facility	CAD\$
04382 - 52660421 – 001 (Auto Finance Term Loan)	\$22,398.86
07512 - 52660421 – 002 (Revolving Credit Line)	\$2,188,610.05
07512 - 52660421 – 004 (Auto Finance Term Loan)	\$180,194.22
00003 318542677 003 (Lease Facility)	\$796,835.58
451607XXXXXX7746 (Visa)	\$11,919.18
451607XXXXXX7894 (Visa)	\$163,887.86
451607XXXXXX8256 (Visa)	\$9,845.34
451607XXXXXX8280 (Visa)	\$5,231.80

451607XXXXXX8587 (Visa)	\$79,075.07
451607XXXXXX8611 (Visa)	\$13,407.96
451607XXXXXX9338 (Visa)	\$26,350.90
451607XXXXXX9395 (Visa)	\$9,513.13
Total	\$3,507,269.95

You guaranteed the obligations of the Debtor under a guarantee agreement dated June 7, 2023, which is limited to the principal sum of \$1,000,000.00 together with interest thereon from the date of demand for payment (the "**Guarantee**").

On behalf of RBC, we hereby make a formal demand for payment of \$1,000,000.00, plus accruing interest and any and all costs and expenses (including, without limitation, any legal and other professional fees) incurred by RBC to the date of indefeasible repayment of all amounts owed to RBC pursuant to the Credit Agreements (collectively, the "**Indebtedness**"). Payment is required to be made immediately. Interest continues to accrue on the Indebtedness at the rates established by the Credit Agreements, the Guarantee, and any other agreement, as applicable.

If payment of the Indebtedness is not received immediately, RBC shall take whatever steps it may consider necessary or appropriate to collect and recover the amounts owing to it, including, without limitation, the commencement of civil legal proceedings against you as a Guarantor, in which case RBC will also be seeking all costs incurred in doing so.

Please govern yourself accordingly.

Yours truly,

AIRD & BERLIS LLP



Per: Sanjeev P.R. Mitra
 SPRM/cd
 61056061.1



Sanjeev Mitra
 Direct: 416.865.3085
 E-mail: smitra@airdberlis.com

July 15, 2024

DELIVERED BY REGULAR AND REGISTERED MAIL

Gary Moore

1 Wexford Road, Unit 9
 Brampton, ON L6Z 2W0

Dear Mr. Moore

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If payment of the Indebtedness is not received immediately, RBC shall take whatever steps it may consider necessary or appropriate to collect and recover the amounts owing to it, including, without limitation, the commencement of civil legal proceedings against you as a Guarantor, in which case RBC will also be seeking all costs incurred in doing so.

Please govern yourself accordingly.

Yours truly,

AIRD & BERLIS LLP



Per: Sanjeev P.R. Mitra
 SPRM/cd
 61055908.1

This is Exhibit "I" referred to in the Affidavit of Tco 'O wcrkj ctc
sworn before me this ; y day of Qeϗdgt, 2024



Commissioner for Taking Affidavits



REGISTERED
DOMESTIC

RECOMMANDÉ
RÉGIME INTÉRIEUR



MOORE BROTHERS TRANSPORT LTD.

13908 Hurontario Street
Inglewood, ON L7C 2B8

CONFIRMATION
DE LA LIVRAISON

postescanada.ca

50-6333

CPC Tracking Number Numéro de repérage de la SCP

RN 802 236 156 CA

Declared Value
Valeur déclarée \$

33-086-584 (17-12)

S. Parsons



REGISTERED
DOMESTIC

RECOMMANDÉ
RÉGIME INTÉRIEUR

324



CUSTOMER RECEIPT

REÇU DU CLIENT

Gary Moore

1 Wexford Road, Unit 9
Brampton, ON L6Z 2W0

FOR DELIVERY
CONFIRMATION

canadapost.ca

CONFIRMATION
DE LA LIVRAISON

postescanada.ca

or/ou

1 888 550-6333

Prov. / Code postal

CPC Tracking Number Numéro de repérage de la SCP

RN 802 236 108 CA

33-086-584 (17-12)

S. Parsons



REGISTERED
DOMESTIC

RECOMMANDÉ
RÉGIME INTÉRIEUR



CUSTOMER RECEIPT

REÇU DU CLIENT

RN 802 236 111 CA

CPC Tracking Number Numéro de repérage de la SCP

1 888 550-6333

Prov. / Code postal

Ronald Moore
10 Flaherty Lane,
Caledon ON L7K 2P3

FOR DELIVERY
CONFIRMATION

canadapost.ca

CONFIRMATION
DE LA LIVRAISON

postescanada.ca

or/ou

1 888 550-6333

postal

CPC Tracking Number Numéro de repérage de la SCP

RN 802 236 139 CA

33-086-584 (17-12)

S. Parsons



REGISTERED
DOMESTIC

RECOMMANDÉ
RÉGIME INTÉRIEUR



CUSTOMER RECEIPT

REÇU DU CLIENT

VAULT CREDIT CORPORATION

41 SCARSDALE ROAD, SUITE 5
TORONTO ON M3B 2R2

FOR DELIVERY
CONFIRMATION

canadapost.ca

CONFIRMATION
DE LA LIVRAISON

postescanada.ca

1 888 550-6333

CPC Tracking Number Numéro de repérage de la SCP

RN 802 236 142 CA

Value déclarée

33-086-584 (17-12)

S. Parsons



REGISTERED
DOMESTIC

RECOMMANDÉ
RÉGIME INTÉRIEUR



CUSTOMER RECEIPT

REÇU DU CLIENT

To Destinataire
Susan Moore

10 Flaherty Lane,
Caledon ON L7K 2P3

FOR DELIVERY
CONFIRMATION

canadapost.ca

CONFIRMATION
DE LA LIVRAISON

postescanada.ca

or/ou

1 888 550-6333

Prov. / Code postal

CPC Tracking Number Numéro de repérage de la SCP

RN 802 236 125 CA

33-086-584 (17-12)

S. Parsons

REGISTERED

Fragile and perishable articles are not indemnified against damage. Indemnity and fees information is available on request at your postal outlet.

Instructions

- 1) Complete any declared value on receipt, tear on perforated line, date stamp on reverse and give receipt to customer.
- 2) Remove label from backing (except area indicated) and apply the label to front of item adjacent to address.

Apply label here
Veuillez placer l'étiquette ici



RECOMMANDÉ

Aucune indemnité ne sera versée pour l'avarie d'un objet fragile ou périssable. Des renseignements sur les indemnités et les droits sont disponibles à votre comptoir postal.

Instructions

- 1) Indiquez la valeur déclarée dans la section Reçu, détachez le long du pointillé, apposez le timbre à date au verso et remettez le reçu au client.
- 2) Décollez la pellicule protectrice (sauf la région indiquée) de l'étiquette. Apposez l'étiquette sur le dessus de l'envoi, près de l'adresse.

ACCEPTING LOCATION LIEU D'ACCEPTATION

CANADA POST POSTES CANADA

103697

2024 -07- 15

POST OFFICE / BUREAU DE POSTE
BROOKFIELD POST OFFICE
TORONTO ON M5J 2T0

REGISTERED

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ACCEPTING LOCATION

LIEU D'ACCEPTATION

325

CANADA POST POSTES CANADA

103697

2024 -07- 15

POST OFFICE / BUREAU DE POSTE
BROOKFIELD POST OFFICE
TORONTO ON M5J 2T0

REGISTERED

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LIEU D'ACCEPTATION

CANADA POST POSTES CANADA

103697

2024 -07- 15

POST OFFICE / BUREAU DE POSTE
BROOKFIELD POST OFFICE
TORONTO ON M5J 2T0



Track: RN802236156CA

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Delivered

July 16 at 10:11 am

Updated: Today at 1:38 pm

Origin
Toronto, ON



Received by
Canada Post
July 15



Delivered
July 16

Delivery information

Sender: Unavailable

Service information

Latest updates

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Sender: Unavailable

Service information

Support

What's an expected delivery?	+
What's a delivery standard?	+
What's a delivery confirmation?	+
How do I sign up for text notifications?	+
What if my package is missing?	+

See more support (</cpc/en/support/kb/tracking/overview.page>)

Service alerts

These events may affect delivery schedules.

See all service alerts (</cpc/en/our-company/news-and-media/service-alerts.page?>)

This is Exhibit "J" referred to in the Affidavit of Tco 'O wcrkj ctc
sworn before me this ; y day of Qeıdgt, 2024



Commissioner for Taking Affidavits

From: Shaun Parsons
Sent: August 23, 2024 10:45 AM
To: Peter Manderville
Cc: Sanjeev Mitra
Subject: RE: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Hello Peter,

Wanted to send a quick note as a reminder that today is the sign-back date of the forbearance agreement. Please let us know when we can see the executed agreement.

Best,

Shaun Parsons (he/him)

T 416.637.7982
E sparsons@airdberlis.com

Aird & Berlis LLP

This email is intended only for the individual or entity named in the message. Please let us know if you have received this email in error. If you did receive this email in error, the information in this email may be confidential and must not be disclosed to anyone.

From: Shaun Parsons <sparsons@airdberlis.com>
Sent: Tuesday, August 20, 2024 7:26 PM
To: Peter Manderville <pmanderville@olflaw.com>
Cc: Sanjeev Mitra <smitra@airdberlis.com>
Subject: RE: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Hello Peter,

We have instructions to allow the Debtors extend the deadline until Friday to execute the attached, and we have updated the sign-back and agreement date accordingly. Please be advised that the deadlines for reporting are unchanged, and begin next week.

If you have any questions, please let us know. We do want to stress that the execution of this agreement is urgent, and are looking forward to receiving an executed copy this week.

Best,

Shaun Parsons (he/him)

T 416.637.7982
E sparsons@airdberlis.com

Aird & Berlis LLP

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From: Peter Manderville <pmanderville@olflaw.com>
Sent: Tuesday, August 20, 2024 2:21 PM
To: Shaun Parsons <sparsons@airdberlis.com>

Cc: Sanjeev Mitra <smitra@airdberlis.com>

Subject: RE: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Hi Shaun, thank you for your reminder note below.

I can advise that the debtor definitely intends to execute the agreement. Unfortunately, they misread the agreement and thought the sign back date was August 26th, as that date is used in a number of instances in the agreement for the provision by the debtor of various documents and information to RBC. I have alerted them to the correct date. However, I am advised that Gary and Ron Moore are on the road and are not back to the Inglewood area until Friday. The debtor will be able to provide RBC with a fully executed agreement by Friday, August 23rd.

I apologize for any inconvenience that this brief delay might cause your client.

Regards,

Peter E. Manderville

Peter E. Manderville, Professional Corporation

ORMSTON LIST FRAWLEY LLP

Barristers & Solicitors

NEW ADDRESS:

5 Church St.

Toronto, ON M5E 1M2

t. 416.594.0791 x. 117

c. 416.709.4640

f. 416.594.9690

www.olflaw.com

This communication, including any attachments, is intended only for the use of the individual(s) or entity(s) to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this communication is not the intended recipient, you are hereby notified that any dissemination, distribution or reproduction of any part of this communication in any format is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to this communication and deleting the original and any automatically generated copies. Thank-you for your co-operation.

From: Shaun Parsons <sparsons@airdberlis.com>

Sent: Tuesday, August 20, 2024 1:31 PM

To: Peter Manderville <pmanderville@olflaw.com>

Cc: Sanjeev Mitra <smitra@airdberlis.com>

Subject: RE: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Hello Peter,

We wanted to follow up on the Forbearance Agreement we had circulated, as the sign-back date is today. Can you advise if the Debtor is intending to execute the agreement?

Thank you,

Shaun Parsons (he/him)

T 416.637.7982
E sparsons@airdberlis.com

Aird & Berlis LLP

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From: Shaun Parsons
Sent: Friday, August 16, 2024 10:12 AM
To: Peter Manderville <pmanderville@olflaw.com>
Cc: Sanjeev Mitra <smitra@airdberlis.com>
Subject: RE: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Hello Peter,

We understand that deposits were made last night into the Debtor's accounts, however, the accounts continue to carry an excess which, as of this morning, has grown to \$26,035.77.

As noted in the forbearance agreement circulated yesterday, your client will need to address the excess before a forbearance can be entered into.

Thank you,

Shaun Parsons (he/him)

T 416.637.7982
E sparsons@airdberlis.com

Aird & Berlis LLP

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From: Shaun Parsons <sparsons@airdberlis.com>
Sent: Thursday, August 15, 2024 2:48 PM
To: Peter Manderville <pmanderville@olflaw.com>
Cc: Sanjeev Mitra <smitra@airdberlis.com>
Subject: RE: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Hello Peter,

As you are aware, we have prepared a forbearance agreement for your client's review, execution and return. Please ensure that the agreement, and all consents, are executed. The sign-back date for the agreement is Tuesday, August 20, 2024.

Please let us know if you have any questions on the attached.

Thank you,

Shaun Parsons (he/him)

T 416.637.7982
E sparsons@airdberlis.com

Aird & Berlis LLP

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From: Sanjeev Mitra <smitra@airdberlis.com>
Sent: Thursday, August 15, 2024 11:49 AM
To: Peter Manderville <pmanderville@olflaw.com>
Cc: Sanjeev Mitra <smitra@airdberlis.com>; Shaun Parsons <sparsons@airdberlis.com>
Subject: FW: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Peter, I was out of office on Tuesday and am just catching up on my emails.

Thank you for email and for speaking to me after hours on Wednesday. The forbearance is being finalized and should be sent to you today. Please review and work with Shaun to have it completed by the sign back date.

In terms of the balance of your email, you should be aware that based on margin reporting your client has no available credit under its revolving facility. The line has been capped at \$2,127,000 and is no longer revolving which the bank is entitled to do under the terms of its credit agreement. I have provided you with a copy of the credit agreement which is attached to this email. The account is presently overdrawn by \$24,000 as the bank has allowed a cheque for \$110,000 for payroll to clear on your clients' assurances that deposits were imminent to cover the overdraft. Going forward any payment requests presented on the account will be returned without further notice unless there are sufficient funds in the account to cover the payment request. Please speak to you clients regarding the managing of cash as this will include payroll.

Please feel free to reach out to me if you have any questions or concerns.

Thanks

Sanj

Sanjeev Mitra, B.Sc., LL.B.

T 416.865.3085
E smitra@airdberlis.com

Aird & Berlis LLP

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Sanjeev Mitra, B.Sc., LL.B.

T 416.865.3085
F 416.863.1515
E smitra@airdberlis.com

Aird & Berlis LLP | Lawyers
Brookfield Place, 181 Bay Street, Suite 1800
Toronto, Canada M5J 2T9 | airdberlis.com



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From: Peter Manderville <pmanderville@olflaw.com>
Sent: Tuesday, August 13, 2024 12:43 PM
To: Sanjeev Mitra <smitra@airdberlis.com>
Cc: Shaun Parsons <sparsons@airdberlis.com>
Subject: RE: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Good afternoon, Sanjeev.

Thank you for your note of August 7th to me below. I look forward to receiving the proposed forbearance agreement from RBC. I can advise that my client's efforts to secure alternate financing are proceeding smoothly, and my client is optimistic that such alternate financing could possibly be in place by or before the end of the month.

However, a significant issue has just cropped up concerning the actions of your client. Apparently, RBC completely locked down our client's accounts on August 6th with no notification to my client, or to me. Nor apparently, did RBC provide any notice of this unilateral action to you, since your note of August 7th below is silent on that point.

From the date of the apparent account lock down on August 6th until today, our client did not require funds from the account. However, they have just been notified that a \$110,000 payment made to Scotiabank has been returned NSF. Such actions by RBC, particularly when taken unilaterally with no advance notice, jeopardize our client's business and its relationships with its suppliers and customers. RBC needs to fix this problem immediately, as our client has dealt with RBC in good faith throughout this process, and fully intends to enter into a mutually acceptable forbearance agreement with RBC once a version of the proposed agreement is provided to us.

On receipt of this note, I would ask that you contact me to confirm that you will speak with your client immediately in an effort to address the miscommunication that has occurred, to unlock the account and to obtain RBC's assurances that no further lockdowns or freezes of our client's RBC accounts will occur while the parties negotiate and agree upon a period of forbearance, ideally until our client's alternate financing is in place.

I hope to hear from you very shortly in this regard.

Yours truly,

Peter E. Manderville

Peter E. Manderville, Professional Corporation
Ormston List Frawley llp
Barristers & Solicitors
NEW ADDRESS:
5 Church St.
Toronto, ON M5E 1M2

t. 416.594.0791 x. 117
c. 416.709.4640
f. 416.594.9690
www.olflaw.com

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addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this communication is not the intended recipient, you are hereby notified that any dissemination, distribution or reproduction of any part of this communication in any format is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to this communication and deleting the original and any automatically generated copies. Thank-you for your co-operation.

From: Sanjeev Mitra <smitra@airdberlis.com>
Sent: Wednesday, August 7, 2024 1:58 PM
To: Peter Manderville <pmanderville@olflaw.com>
Cc: Shaun Parsons <sparsons@airdberlis.com>; Sanjeev Mitra <smitra@airdberlis.com>
Subject: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

EXTERNAL MESSAGE. BEWARE OF CLICKING LINKS OR OPENING ATTACHMENTS.

Peter thank you for your note.

We understand that your client is seeking alternate financing and is seeking some time in order to close a transaction.

My client has instructed us to prepare a forbearance agreement which will set out the terms upon which the bank is prepared to forbear. Terms will include acknowledgment of debt, security and certain limitations on credit. It will include milestones to be achieved by the borrower. A draft will follow from my colleague Shaun Parsons who is working with me on the matter.

Thanks
Sanj

Sanjeev Mitra, B.Sc., LL.B.

T 416.865.3085
E smitra@airdberlis.com

Aird & Berlis LLP

This email is intended only for the individual or entity named in the message. Please let us know if you have received this email in error. If you did receive this email in error, the information in this email may be confidential and must not be disclosed to anyone.

From: Peter Manderville <pmanderville@olflaw.com>
Sent: Thursday, July 18, 2024 11:54 AM
To: Sanjeev Mitra <smitra@airdberlis.com>
Subject: Moore Brothers Transport Ltd. et al Re: RBC Loans

Dear Mr. Mitra:

My firm and I have been retained by Moore Brothers and the Moores as guarantors in respect of the RBC loan facility. I am in receipt of your July 15th correspondence to my clients. As you are likely aware, my clients are in the process of securing re-financing with another lender in order to completely retire the RBC loan facility and discharge all security.

Notwithstanding the aggressive tone of your letter, which I accept as incorporating some necessary boilerplate language, my clients want to work with RBC towards retiring the loan in a timely and mutually satisfactory

manner. I understand that RBC is in the process of preparing a proposed forbearance agreement for my clients' consideration. Please send the proposed agreement to me once it has been prepared.

I should advise you that I am currently on vacation out of the province. So, my response times will be delayed and I am not able to fully engage in this matter until my return to the office.

I look forward to working with you cooperatively to resolve this matter.

Regards,

Peter E. Manderville

Peter E. Manderville, Professional Corporation

Ormston List Frawley LLP

Barristers & Solicitors

NEW ADDRESS:

5 Church St.

Toronto, ON M5E 1M2

t. 416.594.0791 x. 117

c. 416.709.4640

f. 416.594.9690

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From: Shaun Parsons
Sent: August 27, 2024 12:52 PM
To: Sanjeev Mitra; Peter Manderville
Subject: RE: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Hello Peter,

We have not heard anything further from you since we were advised to await the signed agreement to be provided last Friday. As you are aware, the sign-back deadline on the Forbearance Agreement elapsed last Friday.

Can you please let us know the current status on your end? We have advised RBC that the deadline to execute the Forbearance Agreement has elapsed, and the Bank is considering any next step necessary in order to preserve their collateral in this matter.

Thank you,

Shaun Parsons (he/him)

T 416.637.7982
E sparsons@airdberlis.com

Aird & Berlis LLP

This email is intended only for the individual or entity named in the message. Please let us know if you have received this email in error. If you did receive this email in error, the information in this email may be confidential and must not be disclosed to anyone.

From: Sanjeev Mitra <smitra@airdberlis.com>
Sent: Tuesday, August 27, 2024 9:50 AM
To: Peter Manderville <pmanderville@olflaw.com>; Shaun Parsons <sparsons@airdberlis.com>
Cc: Sanjeev Mitra <smitra@airdberlis.com>
Subject: RE: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Paul and Shaun, have we received the fully executed forbearance agreement? If not, when will we see this?

Our client is now asking as we had managed expectations to Aug 23.

Apologies if I missed it as I have had a number of matters to deal with.

Thanks

Sanj

Sanjeev Mitra, B.Sc., LL.B.

T 416.865.3085
E smitra@airdberlis.com

Aird & Berlis LLP

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From: Peter Manderville <pmanderville@olflaw.com>
Sent: Tuesday, August 20, 2024 2:21 PM
To: Shaun Parsons <sparsons@airdberlis.com>
Cc: Sanjeev Mitra <smitra@airdberlis.com>
Subject: RE: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Hi Shaun, thank you for your reminder note below.

I can advise that the debtor definitely intends to execute the agreement. Unfortunately, they misread the agreement and thought the sign back date was August 26th, as that date is used in a number of instances in the agreement for the provision by the debtor of various documents and information to RBC. I have alerted them to the correct date. However, I am advised that Gary and Ron Moore are on the road and are not back to the Inglewood area until Friday. The debtor will be able to provide RBC with a fully executed agreement by Friday, August 23rd.

I apologize for any inconvenience that this brief delay might cause your client.

Regards,

Peter E. Manderville

Peter E. Manderville, Professional Corporation

ORMSTON LIST FRAWLEY LLP

Barristers & Solicitors

NEW ADDRESS:

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From: Shaun Parsons <sparsons@airdberlis.com>
Sent: Tuesday, August 20, 2024 1:31 PM
To: Peter Manderville <pmanderville@olflaw.com>
Cc: Sanjeev Mitra <smitra@airdberlis.com>
Subject: RE: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Hello Peter,

We wanted to follow up on the Forbearance Agreement we had circulated, as the sign-back date is today. Can you advise if the Debtor is intending to execute the agreement?

Thank you,

Shaun Parsons (he/him)

T 416.637.7982
E sparsons@airdberlis.com

Aird & Berlis LLP

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From: Shaun Parsons
Sent: Friday, August 16, 2024 10:12 AM
To: Peter Manderville <pmanderville@olflaw.com>
Cc: Sanjeev Mitra <smitra@airdberlis.com>
Subject: RE: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Hello Peter,

We understand that deposits were made last night into the Debtor's accounts, however, the accounts continue to carry an excess which, as of this morning, has grown to \$26,035.77.

As noted in the forbearance agreement circulated yesterday, your client will need to address the excess before a forbearance can be entered into.

Thank you,

Shaun Parsons (he/him)

T 416.637.7982
E sparsons@airdberlis.com

Aird & Berlis LLP

This email is intended only for the individual or entity named in the message. Please let us know if you have received this email in error. If you did receive this email in error, the information in this email may be confidential and must not be disclosed to anyone.

From: Shaun Parsons <sparsons@airdberlis.com>
Sent: Thursday, August 15, 2024 2:48 PM
To: Peter Manderville <pmanderville@olflaw.com>
Cc: Sanjeev Mitra <smitra@airdberlis.com>
Subject: RE: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Hello Peter,

As you are aware, we have prepared a forbearance agreement for your client's review, execution and return. Please ensure that the agreement, and all consents, are executed. The sign-back date for the agreement is Tuesday, August 20, 2024.

Please let us know if you have any questions on the attached.

Thank you,

Shaun Parsons (he/him)

T 416.637.7982

E sparsons@airdberlis.com

Aird & Berlis LLP

This email is intended only for the individual or entity named in the message. Please let us know if you have received this email in error. If you did receive this email in error, the information in this email may be confidential and must not be disclosed to anyone.

From: Sanjeev Mitra <smitra@airdberlis.com>
Sent: Thursday, August 15, 2024 11:49 AM
To: Peter Manderville <pmanderville@olflaw.com>
Cc: Sanjeev Mitra <smitra@airdberlis.com>; Shaun Parsons <sparsons@airdberlis.com>
Subject: FW: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Peter, I was out of office on Tuesday and am just catching up on my emails.

Thank you for email and for speaking to me after hours on Wednesday. The forbearance is being finalized and should be sent to you today. Please review and work with Shaun to have it completed by the sign back date.

In terms of the balance of your email, you should be aware that based on margin reporting your client has no available credit under its revolving facility. The line has been capped at \$2,127,000 and is no longer revolving which the bank is entitled to do under the terms of its credit agreement. I have provided you with a copy of the credit agreement which is attached to this email. The account is presently overdrawn by \$24,000 as the bank has allowed a cheque for \$110,000 for payroll to clear on your clients' assurances that deposits were imminent to cover the overdraft. Going forward any payment requests presented on the account will be returned without further notice unless there are sufficient funds in the account to cover the payment request. Please speak to you clients regarding the managing of cash as this will include payroll.

Please feel free to reach out to me if you have any questions or concerns.

Thanks

Sanj

Sanjeev Mitra, B.Sc., LL.B.

T 416.865.3085
E smitra@airdberlis.com

Aird & Berlis LLP

This email is intended only for the individual or entity named in the message. Please let us know if you have received this email in error. If you did receive this email in error, the information in this email may be confidential and must not be disclosed to anyone.

Sanjeev Mitra, B.Sc., LL.B.

T 416.865.3085
F 416.863.1515
E smitra@airdberlis.com

Aird & Berlis LLP | Lawyers
Brookfield Place, 181 Bay Street, Suite 1800
Toronto, Canada M5J 2T9 | airdberlis.com



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From: Peter Manderville <pmanderville@olflaw.com>

Sent: Tuesday, August 13, 2024 12:43 PM

To: Sanjeev Mitra <smitra@airdberlis.com>

Cc: Shaun Parsons <sparsons@airdberlis.com>

Subject: RE: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Good afternoon, Sanjeev.

Thank you for your note of August 7th to me below. I look forward to receiving the proposed forbearance agreement from RBC. I can advise that my client's efforts to secure alternate financing are proceeding smoothly, and my client is optimistic that such alternate financing could possibly be in place by or before the end of the month.

However, a significant issue has just cropped up concerning the actions of your client. Apparently, RBC completely locked down our client's accounts on August 6th with no notification to my client, or to me. Nor apparently, did RBC provide any notice of this unilateral action to you, since your note of August 7th below is silent on that point.

From the date of the apparent account lock down on August 6th until today, our client did not require funds from the account. However, they have just been notified that a \$110,000 payment made to Scotiabank has been returned NSF. Such actions by RBC, particularly when taken unilaterally with no advance notice, jeopardize our client's business and its relationships with its suppliers and customers. RBC needs to fix this problem immediately, as our client has dealt with RBC in good faith throughout this process, and fully intends to enter into a mutually acceptable forbearance agreement with RBC once a version of the proposed agreement is provided to us.

On receipt of this note, I would ask that you contact me to confirm that you will speak with your client immediately in an effort to address the miscommunication that has occurred, to unlock the account and to obtain RBC's assurances that no further lockdowns or freezes of our client's RBC accounts will occur while the parties negotiate and agree upon a period of forbearance, ideally until our client's alternate financing is in place.

I hope to hear from you very shortly in this regard.

Yours truly,

Peter E. Manderville

Peter E. Manderville, Professional Corporation

Ormston List Frawley llp

Barristers & Solicitors

NEW ADDRESS:

5 Church St.

Toronto, ON M5E 1M2

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From: Sanjeev Mitra <smitra@airdberlis.com>
Sent: Wednesday, August 7, 2024 1:58 PM
To: Peter Manderville <pmanderville@olflaw.com>
Cc: Shaun Parsons <sparsons@airdberlis.com>; Sanjeev Mitra <smitra@airdberlis.com>
Subject: [EXT] RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

EXTERNAL MESSAGE. BEWARE OF CLICKING LINKS OR OPENING ATTACHMENTS.

Peter thank you for your note.

We understand that your client is seeking alternate financing and is seeking some time in order to close a transaction.

My client has instructed us to prepare a forbearance agreement which will set out the terms upon which the bank is prepared to forbear. Terms will include acknowledgment of debt, security and certain limitations on credit. It will include milestones to be achieved by the borrower. A draft will follow from my colleague Shaun Parsons who is working with me on the matter.

Thanks
Sanj

Sanjeev Mitra, B.Sc., LL.B.

T 416.865.3085
E smitra@airdberlis.com

Aird & Berlis LLP

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From: Peter Manderville <pmanderville@olflaw.com>
Sent: Thursday, July 18, 2024 11:54 AM
To: Sanjeev Mitra <smitra@airdberlis.com>
Subject: Moore Brothers Transport Ltd. et al Re: RBC Loans

Dear Mr. Mitra:

My firm and I have been retained by Moore Brothers and the Moores as guarantors in respect of the RBC loan facility. I am in receipt of your July 15th correspondence to my clients. As you are likely aware, my clients are in the process of securing re-financing with another lender in order to completely retire the RBC loan facility and discharge all security.

Notwithstanding the aggressive tone of your letter, which I accept as incorporating some necessary boilerplate language, my clients want to work with RBC towards retiring the loan in a timely and mutually satisfactory manner. I understand that RBC is in the process of preparing a proposed forbearance agreement for my clients' consideration. Please send the proposed agreement to me once it has been prepared.

I should advise you that I am currently on vacation out of the province. So, my response times will be delayed and I am not able to fully engage in this matter until my return to the office.

I look forward to working with you cooperatively to resolve this matter.

Regards,

Peter E. Manderville

Peter E. Manderville, Professional Corporation

Ormston List Frawley LLP

Barristers & Solicitors

NEW ADDRESS:

5 Church St.

Toronto, ON M5E 1M2

t. 416.594.0791 x. 117

c. 416.709.4640

f. 416.594.9690

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This is Exhibit "K" referred to in the Affidavit of Tco "O wtcrkj ctcp
sworn before me this ; y day of Qeıdgt, 2024



Commissioner for Taking Affidavits

From: Jeremy Nemers
Sent: September 19, 2024 7:27 PM
To: Shimon Sherrington; Jason Wadden
Cc: Sanjeev Mitra; Shaun Parsons
Subject: RE: [EXT]: RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Hi Shimon and Jason,

Thanks for the call with yourselves and the Smiths on Tuesday.

During that call, we were advised for the first time that the debtor's super-priority arrears to CRA had essentially doubled over the past few months, now sitting at almost \$900,000 in respect of source deductions and well-over \$200,000 in respect of HST. We understand from RBC that the debtor has failed to submit recent borrowing base calculation certificates, and so we would ask (as we did on the call) that the debtor please do so right away, together with a listing of its accounts receivable and accounts payable.

Thank you,

Jeremy Nemers (he/him)
Partner

T 416.865.7724
E jnemers@airdberlis.com

Aird & Berlis LLP

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From: Shimon Sherrington <ssherrington@tyrllp.com>
Sent: Monday, September 16, 2024 11:12 AM
To: Jeremy Nemers <jnemers@airdberlis.com>; Jason Wadden <jwadden@tyrllp.com>
Cc: Sanjeev Mitra <smitra@airdberlis.com>; Shaun Parsons <sparsons@airdberlis.com>
Subject: Re: [EXT]: RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

—
Thanks, Jeremy.

Let's do 4pm tomorrow if that still works for everyone at Aird & Berlis. Will circulate an invite.



Shimon Sherrington

T. [+1 587 777 0367](tel:+15877770367)
E. ssherrington@tyrllp.com

488 Wellington Street West, Suite 300-302
Toronto, ON M5V 1E3

From: Jeremy Nemers <jnemers@airdberlis.com>
Sent: Saturday, September 14, 2024 11:35 AM
To: Shimon Sherrington <ssherrington@tyrllp.com>; Jason Wadden <jwadden@tyrllp.com>
Cc: Sanjeev Mitra <smitra@airdberlis.com>; Shaun Parsons <sparsons@airdberlis.com>
Subject: Re: [EXT]: RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Thanks for your email Shimon, the content of which is of further concern to RBC.

RBC has been extremely patient to this point. At this juncture, if your client is looking for additional time to indefeasibly repay RBC in full, your client needs to put forward, immediately, and in writing, what it is prepared to offer.

To the extent you also wish to proceed with a further call as requested in your email, we are presently available on Tuesday between 2 and 5, and on Wednesday between 3 and 5, so please send us a calendar invite on Monday morning for a time during one of those windows.

Thank you,

Jeremy Nemers (he/him)

Partner

T 416.865.7724

E jnemers@airdberlis.com

Aird & Berlis LLP

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From: Shimon Sherrington <ssherrington@tyrllp.com>
Sent: Friday, September 13, 2024 2:37 PM
To: Jeremy Nemers <jnemers@airdberlis.com>; Jason Wadden <jwadden@tyrllp.com>
Cc: Sanjeev Mitra <smitra@airdberlis.com>; Shaun Parsons <sparsons@airdberlis.com>
Subject: Re: [EXT]: RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Jeremy,

1. Moore Brothers is banking at RBC and Scotiabank; our client has been banking with Scotiabank for years before it began its relationship with RBC. The Scotiabank account has been used for payroll, as it has been for years prior and during Moore Brothers relationship with RBC.
2. Please advise whether you are available for a call Tuesday or Wednesday next week with us and Ira Smith to discuss Moore Brothers' proposal on next steps. If you advise your team's availability for those days, then I will coordinate with Jason and Ira and send a calendar invite.

Thanks,
 Shimon



Shimon Sherrington

T. +1 587 777 0367

E. ssherrington@tyrllp.com

488 Wellington Street West, Suite 300-302

Toronto, ON M5V 1E3

From: Jeremy Nemers <jnemers@airdberlis.com>
Sent: Thursday, September 12, 2024 8:50 PM
To: Jason Wadden <jwadden@tyrllp.com>
Cc: Shimon Sherrington <ssherrington@tyrllp.com>; Sanjeev Mitra <smitra@airdberlis.com>; Shaun Parsons <sparsons@airdberlis.com>
Subject: Re: [EXT]: RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Hi Jason,

I'm following-up regarding our 9:30 a.m. conference call of September 10, 2024. During that call, you advised you would confirm back to us by the end of that day whether the debtor is banking elsewhere, and, if so, where.

Three full business days have now passed, and we have still not received a response to what is a very simple question to answer.

RBC reserves all its rights and remedies, both regarding this specific unanswered question and the other defaults, all of which remain outstanding despite significant time having elapsed since demand was made and the forbearance offer was not accepted by your client.

Thanks, and regards,

Jeremy Nemers (he/him)
Partner

T 416.865.7724

E jnemers@airdberlis.com

Aird & Berlis LLP

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From: Jason Wadden <jwadden@tyrllp.com>
Sent: Friday, August 30, 2024 6:26 AM
To: Sanjeev Mitra <smitra@airdberlis.com>; Shaun Parsons <sparsons@airdberlis.com>
Cc: Shimon Sherrington <ssherrington@tyrllp.com>
Subject: Re: [EXT]: RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

I will move a standing call so we can make 9:30am work. I'm happy to keep you posted and if we can connect next week I will let you know.

Also, if there is something particular or unique you think we should know as we get up to speed, please feel free to let us know.

Best regards,
Jason



Jason Wadden

T. [+1 416 627 9815](tel:+14166279815)

E. jwadden@tyrllp.com

488 Wellington Street West, Suite 300-302
Toronto, ON M5V 1E3

From: Sanjeev Mitra <smitra@airdberlis.com>
Sent: Friday, August 30, 2024 12:23 AM
To: Jason Wadden <jwadden@tyrllp.com>; Shaun Parsons <sparsons@airdberlis.com>
Cc: Shimon Sherrington <ssherrington@tyrllp.com>; Sanjeev Mitra <smitra@airdberlis.com>
Subject: Re: [EXT]: RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Thanks Jason and I understand being on a weekly list but candidly it has been a few years. It really can make weekly planning difficult.

I have forwarded your email to my client for instructions. I cannot give you an assurance until I have them unfortunately. I am in trial before Justice tomorrow so will not be able to get instructions until next week at the earliest. Sorry but we had not expected a change of counsel and the timing is just unfortunate.

I have no issue scheduling a call in the morning of Sept 10. regardless. How about 930?

Thank

Sanj

Sanjeev Mitra, B.Sc., LL.B.

Partner

T 416.865.3085

E smitra@airdberlis.com

Aird & Berlis LLP

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From: Jason Wadden <jwadden@tyrllp.com>
Sent: Thursday, August 29, 2024 5:46:19 PM
To: Sanjeev Mitra <smitra@airdberlis.com>; Shaun Parsons <sparsons@airdberlis.com>
Cc: Shimon Sherrington <ssherrington@tyrllp.com>; Sanjeev Mitra <smitra@airdberlis.com>
Subject: Re: [EXT]: RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

Sanj,

I might be able to do by the end of next week, but I'm not sure as I have a motion in Hamilton and they are on a "list schedule" so you get called the day before and told your motion is being heard the next day. Personally, I think it's crazy, but we are stuck with it. So I'm concerned that especially with the short week next week and that motion, I might not be where we need to be to have a real conversation at end of next week and don't like the optics of adjourning a call. That's why I suggested the 9th.

I'm going to be working with them next week (and possibly next weekend) on what is reasonable and viable. We are focussed on getting a good look at where the company is at so we can have a real, meaningful discussion with you as to how we deal with this. I know they had some concerns about the terms of the forbearance agreement, but I don't know how to assess those concerns until I get a better handle on the company's situation.

Could we do the 10th then, as may need the weekend to finish up my review. Ideally if we can do the morning that day that around be better as I have clients coming in from the US for a couple of days of meetings so better if we can do it in the morning if possible.

Best regards,
Jason

**Jason Wadden**T. [+1 416 627 9815](tel:+14166279815)E. jwadden@tyrllp.com488 Wellington Street West, Suite 300-302
Toronto, ON M5V 1E3

From: Sanjeev Mitra <smitra@airdberlis.com>
Sent: Thursday, August 29, 2024 4:57:44 PM
To: Jason Wadden <jwadden@tyrllp.com>; Shaun Parsons <sparsons@airdberlis.com>
Cc: Shimon Sherrington <ssherrington@tyrllp.com>; Sanjeev Mitra <smitra@airdberlis.com>
Subject: [EXT]: RE: Moore Brothers Transport Ltd. et al Re: RBC Loans

CAUTION: This e-mail originated from outside of the firm. Do not click links or open attachments unless you recognize the sender and know that the content is safe.

Hi Jason, I am just coming up to speed on your email.

I have forwarded your email to the bank and will let you know if it is agreeable, however, this has been ongoing for a while and we need to understand what your clients wish to do at this stage.

The bank had previously been advised that a refinancing is in the offing. Is that still the case? If so, do you have anything like a term sheet or commitment letter that you can share?

If not, we need to receive some sort of proposal as to how to address the demand for repayment.

I will be at the CAIRP panel on September 9 so that will be a difficult day for me. I do not think the bank is anxious to let this be delayed even that much. Is there any way we could discuss towards the end of next week?

Thanks

Sanj

Sanjeev Mitra, B.Sc., LL.B.
Partner

T 416.865.3085

E smitra@airdberlis.com**Aird & Berlis LLP**

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From: Jason Wadden <jwadden@tyrllp.com>
Sent: Wednesday, August 28, 2024 10:05 PM
To: Shaun Parsons <sparsons@airdberlis.com>
Cc: Sanjeev Mitra <smitra@airdberlis.com>; Shimon Sherrington <ssherrington@tyrllp.com>
Subject: Moore Brothers Transport Ltd. et al Re: RBC Loans

Shaun,

Your email of today's date to Peter Manderville regarding Moore Brothers Transport Ltd. (the "**Company**") has been forwarded to us for response.

We have been recently retained by the Company with respect to its loans with RBC. We are just getting up to speed and require more time to respond.

We understand that RBC had provided a forbearance agreement, and we understand from your email from earlier today that RBC's position is that there is no longer an active offer of forbearance outstanding. So we understand the need to move forward with dispatch.

We ask that before RBC takes any enforcement steps, that we be given some time to get up to speed so that we can have a meaningful discussion with you about the Company and the RBC Loans.

Can we arrange to speak sometime on Monday, September 9, 2024, before RBC takes any further steps in this matter?

Best regards,
Jason



Jason Wadden

T. [+1 416 627 9815](tel:+14166279815)

E. jwadden@tyrllp.com

488 Wellington Street West, Suite 300-302
Toronto, ON M5V 1E3

This is Exhibit "L" referred to in the Affidavit of Tco 'O wtckj ctcp
sworn before me this ; y day of Qeqdgt, 2024



Commissioner for Taking Affidavits

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

B E T W E E N:

ROYAL BANK OF CANADA

Applicant

- and -

MOORE BROTHERS TRANSPORT INC.

Respondent

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

**CONSENT TO ACT AS
COURT-APPOINTED RECEIVER**

MSI SPERGEL INC. hereby consents to act as the court-appointed receiver, without security, over all of the assets, undertakings and properties of Moore Brothers Transport Inc. pursuant to the terms of an order substantially in the form filed in the above proceeding.

Dated at Toronto, Ontario this 9th day of October, 2024.

MSI SPERGEL INC.

Per: _____

Name: Mukul Manchanda

Title: Managing Partner

I have authority to bind the Corporation.

Applicant

Respondent

Court File No. CV-24-00729106-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

Proceedings commenced at Toronto

**AFFIDAVIT OF RAM MURALITHARAN
(sworn October 9, 2024)**

AIRD & BERLIS LLP
Barristers and Solicitors
Brookfield Place
181 Bay Street, Suite 1800
Toronto, ON M5J 2T9

Sanjeev P. R. Mitra (LSO # 37934U)
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Shaun Parsons (LSO # 81240A)
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Fax: (416) 863-1515
Email: sparsons@airdberlis.com

Lawyers for Royal Bank of Canada.

TAB 5

Court File No. CV-24-00729106-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

B E T W E E N:

ROYAL BANK OF CANADA

Applicant

- and -

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**APPLICATION UNDER SUBSECTION 243(1) OF THE *BANKRUPTCY AND
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COURTS OF JUSTICE ACT, R.S.O. 1990, c. C.43, AS AMENDED**

SERVICE LIST

(current as of October 8, 2024)

TO:	<p>AIRD & BERLIS LLP Brookfield Place 181 Bay Street, Suite 1800 Toronto, ON M5J 2T9</p> <p>Sanjeev P. R. Mitra Tel: (416) 865-3085 Email: smitra@airdberlis.com</p> <p>Jeremy Nemers Tel: (416) 865-7724 Email: jnemers@airdberlis.com</p> <p>Shaun Parsons Tel: (416) 637-7982 Email: sparsons@airdberlis.com</p> <p>Lawyers for the Applicant</p>
AND TO:	<p>MSI SPERGEL INC. 200 Yorkland Boulevard, Suite 1100 Toronto ON M2J 5C1</p>

	<p>Mukul Manchanda Email: mmanchanda@spergel.ca</p> <p>Proposed Receiver</p>
AND TO:	<p>MOORE BROTHERS TRANSPORT INC. 13908 Hurontario Street Inglewood, ON L7C 2B8</p> <p>Respondent</p>
AND TO:	<p>TYR LLP 488 Wellington St West, Suite 300-302 Toronto, ON M5V 1E3</p> <p>Jason Wadden Tel: (416) 267-9815 Email: jwadden@tyrllp.com</p> <p>Shimon Sherrington Tel: (587) 777-0367 Email: ssherrington@tyrllp.com</p> <p>Counsel to the Respondent</p>
AND TO:	<p>GARY MOORE 1 Wexford Road, Unit 9 Brampton ON L6Z 2W0</p> <p>Guarantor</p>
AND TO:	<p>RONALD MOORE 10 Flaherty Lane Caledon ON L7K 2P3</p> <p>Guarantor</p>
AND TO:	<p>SUSAN MOORE 10 Flaherty Lane Caledon ON L7K 2P3</p> <p>Guarantor</p>
AND TO:	<p>OFFICE OF THE SUPERINTENDENT OF BANKRUPTCY 151 Yonge Street 4th Floor Toronto ON M5C 2W7</p> <p>Tel: (416) 973-6441 Email: osbservice-bsfservice@ised-isde.gc.ca</p>
AND TO:	<p>DEPARTMENT OF JUSTICE CANADA Ontario Regional Office</p>

	120 Adelaide Street West, Suite 400 Toronto, ON M5H 1T1 Email: AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca
AND TO:	HIS MAJESTY THE KING IN RIGHT OF CANADA as represented by Ministry of Finance Legal Services Branch Revenue Collections Branch – Insolvency Unit 33 King Street West, P.O. Box 627 Oshawa, ON L1H 8H5 Email: insolvency.unit@ontario.ca

PPSA Registrants:

AND TO:	TD EQUIPMENT FINANCE CANADA, A DIVISION OF THE TORONTO-DOMINION BANK 400-5045 South Service Road Burlington ON L7L 5Y7
AND TO:	THE TORONTO-DOMINION BANK 400-5045 South Service Road Burlington ON L7L 5Y7
AND TO:	WELLS FARGO EQUIPMENT FINANCE COMPANY 1290 Central Parkway W. Suite 1100 Mississauga ON L5C 4R3
AND TO:	CANADIAN WESTERN BANK LEASING INC. 300, 606 4 Street SW Calgary AB T2P1T1
AND TO:	RCAP LEASING INC. 300 - 5575 North Service Rd Burlington ON L7L 6M1
AND TO:	BANK OF MONTREAL 5750 Explorer Drive Mississauga ON L4W 0A9
AND TO:	CLE CAPITAL INC. 3390 South Service Road, Suite 301 Burlington ON L7N3J5
AND TO:	CONCENTRA BANK C/O Comm Leasing, Box 3030 Regina SK S4P3G8
AND TO:	FORD CREDIT CANADA COMPANY PO Box 2400 Edmonton AB T5J 5C7

AND TO:	BANK OF NOVA SCOTIA – DLAC 44 King Street W Scotia Plaza Toronto ON M5H 1H1
AND TO:	CANADIAN DEALER LEASE SERVICES INC. 372 Bay Street, Suite 1800 Toronto ON M5H 2W9
AND TO:	DE LAGE LANDEN FINANCIAL SERVICES CANADA INC. 5046 Mainway, Unit 1 Burlington ON L7L 5Z1
AND TO:	MERIDIAN ONECAP CREDIT CORP. Suite 1500, 4710 Kingsway Burnaby BC V5H 4M2
AND TO:	TIP FLEET SERVICES CANADA LTD. 1880 Britannia Road East Mississauga ON L4W 1J3
AND TO:	LBEL INC. 5035 South Service Road Burlington ON L7L 6M9
AND TO:	VAULT CREDIT CORPORATION 41 Scarsdale Road, Suite 5 Toronto ON M3B 2R2
AND TO:	CWB NATIONAL LEASING INC. 1525 Buffalo Place (3170354) Winnipeg MB R3T 1L9
AND TO:	MITSUBISHI HC CAPITAL CANADA LEASING, INC. 1100 Burloak Drive, Suite 401 Burlington ON L7L 6B2
AND TO:	ECAPITAL FREIGHT FACTORING, INC. 174 West Street S Orillia ON L3V 6L4

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insolvency.unit@ontario.ca

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ROYAL BANK OF CANADA

- and -

MOORE BROTHERS TRANSPORT LTD.

Applicant

Respondents

Court File No. CV-24-00729106-00CL

**ONTARIO
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APPLICATION RECORD

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