

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

B E T W E E N:

CITY OF TORONTO

Applicant

- and -

HARRY SHERMAN CROWE HOUSING CO-OPERATIVE INC.

Respondent

**AIDE MEMOIRE OF THE RESPONDENT
(Chambers Appointment: November 28, 2025)**

1. Pursuant to the Order of Justice Kimmel dated June 03, 2025 (the “**Order**”), the Court addressed the Board’s request for approval of funding to cover both past and future legal expenses incurred by its counsel, in connection with the receivership proceedings. The court carefully distinguished between pre-receivership invoices, post-receivership invoices already rendered, and future legal expenses relating to upcoming motions.

2. Pursuant to clause (42) of the Order, it stated that “*the post-Receivership as-of-yet unbilled legal expenses incurred by legal counsel for the Board in connection with the Receiver’s Second Report Approval Motion are approved up to an all-inclusive maximum of \$10,000 (or such lesser amount is substantiated and/or awarded by the court in its discretion at or after that motion)*”.

3. Pursuant to the Order, Counsel for Board continued representation on behalf of the Board and attended a virtual hearing on June 20, 2025, with respect to the Receiver’s

Motion dated May 01, 2025. Counsel for the Board was also required to draft and file documentation in preparation for attendance. The invoice for disbursements and reasonably incurred legal fees were delivered to the Counsel for the Receiver and Counsel for the City of Toronto.

4. Counsel for the Respondent and Counsel for the Receiver remain in dispute whether these legal fees are to be paid to Counsel for the Board pursuant to the court order.

5. The Board wishes to schedule an appearance before this Court to seek clarity on the Order with respect to post-receivership legal fees reasonably incurred by the Board and to seek further directions or approvals for funding from the Court with respect to Court order dated June 03, 2025.

6. The Court has approved significant legal fees for counsel representing the Receiver, and the request for funding of legal fees for a party such as the Board which requires legal assistance is only just and equitable.

7. The Board anticipates that 30 minutes will be required for the appearance.

November 25, 2025

BETTY'S LAW OFFICE

2300 Yonge Street
Suite 1600
Toronto, ON
M4P 1E4

Courtney Betty (LSO # 28347U)

betty@bettyslaw.com

Tel: 416-972-9472

Lawyers for the Respondent
Harry Sherman Housing Co-operative Inc.

CITY OF TORONTO

Applicant

-and- **HARRY SHERMAN CROWE HOUSING CO-OPERATIVE
INC.**

Respondent

Court File No. CV-22-00688248-00CL

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

PROCEEDING COMMENCED AT
TORONTO

AIDE MEMOIRE OF THE RESPONDENT

BETTY'S LAW OFFICE
2300 Yonge Street
Suite 1600, Toronto, ON
M4P 1E4

Courtney Betty (LSO# 28347U)
betty@bettyslaw.com

Cc: tenechia@bettyslaw.com

Tel: 416-972-9472

**Lawyers for the Respondent,
Harry Sherman Housing Co-
operative Inc.**