

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

B E T W E E N:

FIRST SOURCE FINANCIAL MANAGEMENT INC.

APPLICANT

- AND -

KING DAVID INC. AND HELEN ROMAN-BARBER

RESPONDENTS

**IN THE MATTER OF AN 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**

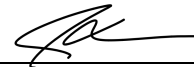
**AIDE MEMOIRE OF THE RECEIVER,
TDB RESTRUCTURING LIMITED
(returnable July 23, 2025)**

1. This Aide Memoire is being filed by TDB Restructuring Limited ("**TDB**"), in its capacity as receiver (the "**Receiver**") of certain lands and premises (the "**Property**") owned by King David Inc. as defined in Schedule A to the Appointment Order. On December 21, 2023, pursuant to an Order of the Ontario Superior Court of Justice (Commercial List), RSM Canada Limited (as replaced by TDB pursuant to a substitution Order dated March 1, 2024) was appointed, without security, as the Receiver over the Property.

2. The purpose of the scheduling hearing on July 23, 2025 is to set a return date for a motion to be brought by the Receiver to seek approval of a proposed sale process (the "**Sale Process**") including approval of a stalking horse credit bid offer (for the purposes of serving as a stalking horse bid) submitted by Home Trust Company ("**HTC**"), the senior secured lender in respect of the Property.

3. The Receiver has canvassed Court availability for August 14, 2025 for a 90 minute motion. Counsel for HTC and First Source Financial Management Inc. have confirmed their availability for that date.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 22nd day of July 2025.



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First Source Financial Management
Inc.
Applicant

-and-

King David Inc. et al.
Respondents

Court File No.: CV-23-00710411-00CL

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PROCEEDING COMMENCED AT
TORONTO

AIDE MEMOIRE OF THE RECEIVER

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