

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

B E T W E E N :

QUALITY RUGS OF CANADA LIMITED

Applicant

- and -

**WAYGAR CAPITAL INC., AS AGENT FOR NINEPOINT CANADIAN SENIOR
DEBT MASTER FUND L.P.**

Respondent

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 QUALITY RUGS OF CANADA LIMITED AND THE OTHER COMPANIES
LISTED IN SCHEDULE "A" HERETO (THE "APPLICANTS")

**RESPONDING MOTION RECORD OF THE UNITED
BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA**

(RE: HOLDBACK)

September 21, 2023

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TO: THE SERVICE LIST

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

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 QUALITY RUGS OF CANADA LIMITED AND
THE OTHER COMPANIES LISTED IN SCHEDULE "A" HERETO.

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(as of September 18, 2023)

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SCHEDULE A OTHER APPLICANTS

A.1 QSG Opcos (in addition to QRCL)

1. Timeline Floors Inc.
2. Ontario Flooring Ltd
3. Weston Hardwood Design Centre Inc
4. Malvern Contract Interiors Limited

A.2 Holding Companies

5. Quality Commercial Carpet Corporation;
6. Joseph Douglas Pacione Holdings Ltd.;
7. John Anthony Pacione Holdings Ltd.;
8. Jopac Enterprises Limited;
9. Patjo Holdings Inc.

Court File No.: CV-23-00703933-00CL

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

B E T W E E N :

QUALITY RUGS OF CANADA LIMITED

Applicant

- and -

**WAYGAR CAPITAL INC., AS AGENT FOR NINEPOINT CANADIAN SENIOR
DEBT MASTER FUND L.P.**

Respondent

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
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2		September 21, 2023	Second Affidavit of Tomas Bereta
	A	September 18, 2023	A copy of the email sent by Mr. D. Wright to Mr. C. Besant, counsel for Quality Rugs of Canada Limited
	B	September 20, 2023	A copy of the email sent by Mr. C. Besant to Mr. D. Wright
	C	September 20, 2023	A copy of Mr. D. Wright's email to Mr. C. Besant requesting information about the Holdback Funds

TAB 1

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

**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 QUALITY RUGS OF CANADA LIMITED AND THE OTHER COMPANIES
LISTED IN SCHEDULE "A" HERETO (THE "APPLICANTS")**

NOTICE OF MOTION

(Re: Holdback)

The Carpenters' Regional Council of the United Brotherhood of Carpenters and Joiners of America (the "Carpenters' Union") will make a motion to the Honourable Justice Penny of the Ontario Superior Court of Justice Commercial List at 330 University Avenue, Toronto, Ontario on Friday, September 22, 2023 at 10:00 a.m. or as soon thereafter as the motion can be heard.

PROPOSED METHOD OF HEARING: The motion is to be heard orally by video conference VIA ZOOM. Zoom information to be provided by the Court.

THE MOTION IS FOR:

1. **AN ORDER**, that the time for service of the Notice of Motion and the Motion Record is hereby abridged;
2. **DIRECTIONS** with respect to the below described Holdback Funds;

3. **AN ORDER** requiring that the Applicants (collectively "QSG") and/or the Monitor to confirm whether funds are being held separate and apart with respect to the Holdback Funds and to provide particulars with respect to same;
4. **AN ORDER** that, if the Holdback Funds are being held separate and apart, that they continue to be held separate and apart and do not form part of the assets of QSG's estate; and be distributed and used only as set out in the applicable collective agreements, and that this Order survives the termination of these CCAA proceedings and/or any future insolvency;
5. **A DECLARATION** that the Holdback Funds are being held in trust and pursuant to the terms of the applicable collective agreements;
6. **Alternatively**, if the Holdback Funds are not Ordered to be held separate and apart,
 - a) **AN ORDER** to lift the stay of proceedings against the directors and officers of QSG to proceed with a grievance or grievances and/or a labour arbitration and/or proceedings at the Ontario Labour Relations Board against them regarding the Holdback Funds (the "**Grievances**"), including grievances and/or arbitrations relating breach of trust, breach of fiduciary duty, and breach of the applicable collective agreements;
 - b) **AN ORDER** that the amount of \$95,028.00 (the "**Reserve**"), or such other amount representing the Holdback, be set aside and held separate and apart from the assets of QSG pending the final disposition of the Grievances;
 - c) **A DECLARATION** that the Reserve does not form part of the assets of QSG's estate and is distributed upon further order of this Court after the conclusion of the Grievances;

- d) **AN ORDER** that the Reserve be funded from any and all accounts receivable collected during these proceedings and/or from any sales proceeds, and/or from the Deferred Purchase Price and the A/R Collections in excess of the Specified Amount (as those terms are defined at paragraph 17 of the Monitor's August 25, 2023 Second Supplemental Pre-Filing Report); and,
 - e) **AN ORDER** that any purchaser of QSG's assets not be absolved of the liability for the Holdback; and,
7. Such further and other relief as this Honourable Court may deem just.

THE GROUNDS FOR THE MOTION ARE:

1. The Carpenters' Union represents about 55 Pieceworkers employed by QSG (the "**Carpenter Pieceworkers**"). The Carpenter Pieceworkers continue to work for QSG throughout the CCAA restructuring process with the reasonable expectation that they will be paid and that the portion of their compensation held back by QSG as security for post-filing deficiencies and back charges will be returned to them as per the terms of the applicable collective agreements.
2. LIUNA Local 183 ("**Local 183**") is pursuing a substantially similar motion on behalf of its union Pieceworkers. In the interests of avoiding duplication of resources, and in the interests of saving the Court's valuable time, the Carpenters' Union adopts and relies on the arguments set out in paragraphs 1 through 24 of Local 183's grounds for motion. The Carpenters' Union relies on Local 183's arguments as the basis for the Carpenters' Union's grounds for motion.

3. With respect to the Carpenters' Union, the total holdback that QSG has withheld from the Carpenter Pieceworkers is \$95,028.00 (the "**Holdback Funds**"). Other than the specified Holdback Funds belonging to the Carpenter Pieceworkers, the Carpenters' Union adopts and relies on the entirety of Local 183's arguments set out in the above-noted paragraphs.

THE FOLLOWING DOCUMENTARY EVIDENCE will be read in support of this motion:

- a) Affidavit of Tomas Bereta, affirmed September 11, 2023;
- b) Second Affidavit of Tomas Bereta, affirmed September 21, 2023;
- c) Motion materials served by Local 183 on September 20, 2023, to the extent it affects the relief sought in this motion and as applicable to the facts of the Carpenters' Union in this motion; and,
- d) Such further and other material as counsel may advise and this Court permit.

September 21, 2023

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TO: THE SERVICE LIST

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT, R.S.C. 1985,
c. C-36, AS AMENDED

Court File No.: CV-23-00703292-00CL

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF QUALITY
RUGS OF CANADA LIMITED AND THE OTHER COMPANIES LISTED IN SCHEDULE "A"

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

Proceeding commenced at TORONTO

**NOTICE OF MOTION
(RE: HOLDBACK)**

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TAB 2

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

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 Quality Rugs of Canada
Limited and the Other Group Listed in Schedule "A" Hereto (the "**Applicants**")

**SECOND AFFIDAVIT OF TOMAS BERETA
(Affirmed September 21, 2023)**

I, **TOMAS BERETA**, in the City of Toronto, in the Province of Ontario, **AFFIRM:**

1. I am a Business Representative for the Carpenters' Regional Council of the United Brotherhood of Carpenters and Joiners of America (the "**Carpenters' Union**"). The facts set forth herein are within my personal knowledge or determined from the face of the documents attached as exhibits or from information and advice provided to me by third parties. Where I have relied upon such information and advice, I verily believe same to be true.
2. I affirm this affidavit in response to the Application Record of Quality Rugs of Canada Limited (along with its related entities, "**QSG**") (the "**QSG Application**"). This affidavit is also affirmed further to my September 11, 2023 affidavit (the "**September 11 Affidavit**"), and with respect to the below described Holdback.

3. I described the origin and evolution of the pieceworker holdback in paragraphs 11-15 of the September 11 Affidavit (the “**Holdback**”). In short, the Holdback was collected from the rightfully earned wages of pieceworkers engaged in hardwood, carpet, and resilient flooring piecework for QSG (the “**Pieceworkers**”). The Holdback was collected prior to May 2, 2023, under the Local 183 Flooring Collective Agreement, as described in paragraphs 12-13 of the September 11 Affidavit.
4. As I stated in paragraph 11 of the September 11 Affidavit, the Pieceworkers’ union representation changed from Local 183 to the Carpenters’ Union on May 2, 2023. Despite the change in union representation, QSG’s process in dealing with the Holdback for each Pieceworker remains the same. As of the date of this affidavit, QSG has not returned the Holdback to the Pieceworkers (presently represented by the Carpenters’ Union, i.e., the “**Carpenter Pieceworkers**”).
5. Schedule “C” and Schedule “D” of the Local 183 Flooring Collective Agreement provide particulars for the Pieceworker Holdback regime, which has been maintained pre and post change in union representation (the “**Pieceworker Holdback Regime**”). Excerpts from the Pieceworker Holdback Regime are set out below:

ARTICLE 4 – HOLDBACK ACCOUNTS

...

4.02 The Company is entitled to create a holdback fund, not to exceed \$2000, for each piecework/subcontractor crew engaged after the introduction of this Collective Agreement. The **holdback account** may be established by the Company as soon as pieceworker /subcontractor commences work for the Company. **The Company shall be entitled to deduct money owing to the pieceworker /subcontractor to fund the holdback account and shall clearly indicate such deductions on the pieceworker invoice.** However, in no circumstance shall the Company deduct more than fifteen percent (15%) of any invoice for holdback and/or back charges.

...

4.04 The Company acknowledges that the holdback accounts belong to the pieceworkers/subcontractors and that any such monies are held in trust by the Company. The Company will keep all holdback monies in a designated holdback account. By no later than the 15th day of each month each Company which maintains a holdback account for any pieceworker/subcontractor covered by this Collective Agreement shall provide a Holdback Summary Notice to the Union. The Holdback Summary Notice shall list the names of each pieceworkers/subcontractors for whom the Company has a holdback account; together with the balance of the holdback account as of the last day of the month. The Holdback Summary Notice shall stipulate a final total of the holdback amounts held back by the Company for all pieceworkers/subcontractors.

6. Notably:

- a. the Holdback Regime describes a “holdback account”;
- b. the funds within the holdback account are solely comprised of money owed to the Pieceworkers;
- c. the funds deducted from each Pieceworker are clearly indicated on each invoice;
- d. the funds within the holdback account “belong to the pieceworkers”; and
- e. the funds are “held in trust by the Company”.

7. The Carpenters’ Union’s interpretation and understanding of the Pieceworker Holdback Regime is that the parties intended for the creation of a trust. The Carpenter Pieceworkers understand the same to be true. Furthermore, the Carpenter’s Union asserts that QSG’s obligations as trustee continue to be in force despite the change in union representation described at paragraph 11 in the September 11 Affidavit.

8. On or around September 18, 2023, Mr. Wright requested a list of the holdback amounts owing to each Carpenter Pieceworker. Attached hereto as Exhibit “A” is a copy of the email sent by Mr. Wright to counsel for QSG, dated September 18, 2023. On or around September 20, 2023, counsel for QSG reported a total of \$95,028.00 owing to Carpenter Pieceworkers (the “**Holdback Funds**”). Counsel for QSG undertook to provide a list of the amounts owed to

each individual Pieceworker at a later date. Attached hereto as Exhibit “B” is a copy of the email sent by counsel for QSG to Mr. Wright, dated September 20, 2023. I have been advised by Mr. Wright that the aforementioned list has still not been provided.

9. I am advised by Mr. Wright and verily believe that, to date, he has not been informed whether the Holdback Funds are currently being held in trust, and separate and apart from QSG’s assets. Attached hereto as Exhibit “C” is a copy of Mr. Wright’s email to QSG’s counsel requesting information about the Holdback Funds. Specifically, the Union seeks confirmation of the following:

- a. Why the Holdback Funds were not listed on QSG’s asset sheet or in QSG’s list of creditors;
- b. What happened to the Holdback Funds;
- c. Whether the Holdback Funds were properly held back in a separate trust account; and,
- d. Whether QSG disagrees that the intent of the applicable collective agreements is to set up a trust.

10. If the Holdback Funds are not Ordered to be held separate and apart, the Carpenters’ Union seeks *inter alia*:

- a. an Order to create a reserve (the “**Reserve**”) relating to the \$95,028.00 Holdback Funds, or such other amount representing the Holdback, pending a determination of a grievance to be commenced by the Carpenters’ Union regarding the applicable collective agreements; and,

- b. an Order lifting the stay of proceedings as against the directors and officers of QSG to proceed with the above-noted grievance and/or labour arbitration against them regarding the Holdback Funds, including breach of trust, breach of fiduciary duty, and breach of the applicable collective agreements.
11. It is paramount to recognize the prejudice that would be inflicted upon the Carpenter Pieceworkers if the Holdback Funds become part of QSG's assets. The Pieceworkers are undoubtedly the most vulnerable stakeholders in these CCAA proceedings as they rely on these wages to support themselves and their families.
12. The Holdback Funds only arise under the applicable collective agreements. The Holdback Funds are essential income derived from earned wages which was held back for the mere purpose of correcting potential deficiencies and payment of any back charges. The Holdback Funds never belonged to QSG. Attaching the Holdback Funds to QSG's assets would immediately deprive the Pieceworkers of their earned and unpaid wages.
13. The Holdback Funds were deducted from the Pieceworkers' wages and the Pieceworkers were required to pay income tax and HST in respect of those payments. Attaching the Pieceworker Holdback Funds to QSG's assets would provide QSG with an undue windfall while depriving Pieceworkers of a portion of their earned income.
14. Additionally, if a Reserve is not created, then the Carpenter Pieceworkers will not have a remedy to pursue in respect of potential grievances. Therefore, the Carpenters' Union asserts that QSG must maintain the Holdback, or a Reserve comprised of the Holdback Funds, as a condition for the Carpenter Pieceworkers' continued work post-CCAA filing.
15. I have also reviewed the Affidavit of Graham Williamson, General Counsel to LIUNA Local 183, sworn on September 19, 2023. It is my understanding that Pieceworkers who are

represented by LIUNA Local 183 and the Carpenter Pieceworkers are in a substantially similar position respecting their claim to the their respective holdbacks in the underlying CCAA proceedings. Specifically, the Carpenters' Union adopts and relies on the facts and arguments asserted in paragraphs 83, 85, 88, 89, 90, 91, and 93 of the Affidavit of Graham Williamson.

16. The Carpenters' Union respectfully requests for the preservation of the Holdback Funds in trust pursuant to the obligations set out in the Pieceworker Holdback Regime. In the alternative, the Carpenters' Union respectfully requests the creation of a Reserve for the total amount of the Holdback Funds pending a grievance and/or labour arbitration to be commenced by the Carpenters' Union regarding the applicable collective agreements.

AFFIRMED remotely by Tomas Bereta)
stated as being located in the City of Toronto,)
in the Province of Ontario, before me in the)
City of Toronto, in the Province of Ontario,)
on this 21 day of September, 2023, in)
accordance with O. Reg. 431/20,)
Administering Oath or Declaration Remotely.)



A Commissioner for Taking Affidavits, etc.

Daniel Wright, LSO # 87443L



TOMAS BERETA

Schedule “A” – Other Applicants

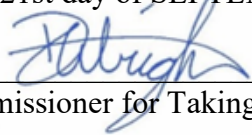
A.1 QSG Opcos (in addition to QRCL)

1. Timeline Floors Inc.
2. Ontario Flooring Ltd.
3. Weston Hardwood Design Centre Inc.
4. Malvern Contract Interiors Limited

A.2 Holding Companies

5. Quality Commercial carpet Corporation
6. Joseph Douglas Pacione Holdings Ltd.
7. John Anthony Pacione Holdings Ltd.
8. Jopac Enterprises Limited
9. Patjo Holdings Inc.

This is **EXHIBIT "A"** referred to in the
Affidavit of TOMAS BERETA
dated the 21st day of SEPTEMBER, 2023.

A handwritten signature in blue ink, appearing to read "J. D. ...", is written over a horizontal line.

A Commissioner for Taking Oaths, Etc.

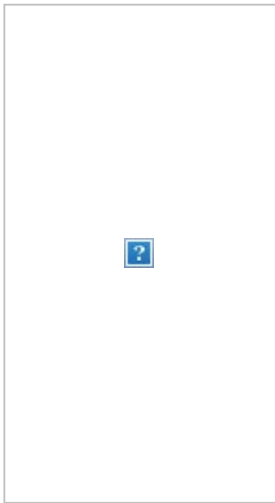
From: [Daniel Wright](#)
To: [Besant, Chris](#)
Cc: [Ella Price](#)
Subject: QSG - Carpenters Holdback CCAA - CV-23-00703933-00CL
Date: Monday, September 18, 2023 2:15:17 PM
Attachments: [image001.png](#)

Hi Chris,

During our call on Friday, you mentioned the amount owing to Carpenters' Pieceworkers under the contractual holdbacks is approximately \$105k.

Can you please send a copy of the list of Pieceworkers and amount held back from their wages?

Thank you,



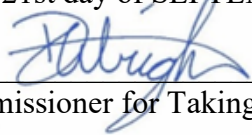
Daniel Wright

Lawyer
Rousseau Mazzuca LLP
T: 416.304.9899 x 2010
F: 437.800.1453
E: dwright@rousseau Mazzuca.com

65 Queen Street West, Suite 600
Toronto, Ontario M5H 2M5
www.rousseau Mazzuca.com

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This is **EXHIBIT "B"** referred to in the
Affidavit of TOMAS BERETA
dated the 21st day of SEPTEMBER, 2023.

A handwritten signature in blue ink, appearing to read "J. D. ...", is written over a horizontal line.

A Commissioner for Taking Oaths, Etc.

From: [Besant, Chris](#)
To: [Daniel Wright](#)
Cc: [Ella Price](#)
Subject: RE: QSG - Carpenters Holdback CCAA - CV-23-00703933-00CL
Date: Wednesday, September 20, 2023 7:49:44 AM
Attachments: [image001.png](#)

I don't have the breakdown by installer but will have requested that and will provide once I have it.

The totals at Sept 15 are

L 27 Carpenters Carpet	30,248.00
L 27 Carpenters Hardwood	64,780.00

Chris Besant • Partner

Gardiner Roberts LLP

Bay Adelaide Centre - East Tower, 22 Adelaide St W, Ste. 3600, Toronto, ON M5H 4E3

T 416.865.4022 | F 416.865.6636 | E cbesant@grllp.com | www.grllp.com/p/christopherbesant

From: Daniel Wright [mailto:Dwright@RousseauMazzuca.com]
Sent: Tuesday, September 19, 2023 10:31 AM
To: Besant, Chris
Cc: Ella Price
Subject: RE: QSG - Carpenters Holdback CCAA - CV-23-00703933-00CL

Good morning, Chris,

I'm following up to the email below.

Thanks,



Daniel Wright

Lawyer

Rousseau Mazzuca LLP

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F: 437.800.1453

E: dwright@rousseaumazzuca.com

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Toronto, Ontario M5H 2M5

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From: Daniel Wright
Sent: September 18, 2023 2:15 PM
To: Besant, Chris <cbesant@grllp.com>

Cc: Ella Price <Ella@RousseauMazzuca.com>

Subject: QSG - Carpenters Holdback CCAA - CV-23-00703933-00CL

Hi Chris,

During our call on Friday, you mentioned the amount owing to Carpenters' Pieceworkers under the contractual holdbacks is approximately \$105k.

Can you please send a copy of the list of Pieceworkers and amount held back from their wages?

Thank you,



Daniel Wright

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Toronto, Ontario M5H 2M5

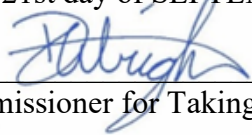
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This is **EXHIBIT "C"** referred to in the
Affidavit of TOMAS BERETA
dated the 21st day of SEPTEMBER, 2023.

A handwritten signature in blue ink, appearing to read "J. D. ...", is written over a horizontal line.

A Commissioner for Taking Oaths, Etc.

From: [Daniel Wright](#)
To: [Besant, Chris](#)
Cc: [Ella Price](#); [Michael Mazzuca](#)
Subject: RE: QSG - Carpenters Holdback CCAA - CV-23-00703933-00CL
Date: Wednesday, September 20, 2023 3:59:20 PM
Attachments: [image001.png](#)
[RE OSG.msg](#)

Hi Chris,

Thank you for getting back to us.

We understand that Demetrios Yiokaris, counsel for LIUNA Local 183, sent you an email on September 17, 2023, regarding QSG's holdback obligations under the Local 183 Collective Agreements (attached). We would like to know if you have replied to Mr. Yiokaris' inquiries.

The Carpenters' Union are also interested in receiving similar answers to the below listed inquiries as it pertains to the Carpenters' Union and their Pieceworkers members:

- a. Why was the holdback money not listed on QSG's asset sheet, or in the list of creditors;
- b. What happened to the holdback money;
- c. Was the holdback money ever held back in a separate account; and
- d. Does the company agree that the intent of the Collective Agreement is to set up a trust?

As indicated in your email below, QSG currently holds \$95,028.00 for the benefit of Carpenter Pieceworkers (the "Holdback Funds"). The entirety of the Holdback Funds was drawn from the rightfully earned wages of the Carpenter Pieceworkers. The Carpenter Pieceworkers were represented by Local 183 prior to May 2, 2023. Therefore, the Holdback Funds were collected pursuant to Local 183's Flooring Collective Agreement. Excerpts from the holdback provision are set out below.

ARTICLE 4 - HOLDBACKACCOUNTS

...

4.02 The Company is entitled to create a holdback fund, not to exceed \$2000, for each piecework/subcontractor crew engaged after the introduction of this Collective Agreement. The **holdback account** may be established by the Company as soon as pieceworker /subcontractor commences work for the Company. **The Company shall be entitled to deduct money owing to the pieceworker /subcontractor to fund the holdback account and shall clearly indicate such deductions on the pieceworker invoice.** However, in no circumstance shall the Company deduct more than fifteen percent (15%) of any invoice for holdback and/or back charges.

...

4.04 **The Company acknowledges that the holdback accounts belong to the pieceworkers/subcontractors and that any such monies are held in trust by the Company. The Company will keep all holdback monies in a designated holdback account.** By no later than the 15th day of each month each Company which maintains a holdback account for any pieceworker/subcontractor covered by this Collective Agreement shall provide a Holdback Summary Notice to the Union. The Holdback Summary Notice shall list the names of each pieceworkers/subcontractors for whom

the Company has a holdback account; together with the balance of the holdback account as of the last day of the month. The Holdback Summary Notice shall stipulate a final total of the holdback amounts held back by the Company for all pieceworkers/subcontractors.

It is evident from the language in the collective agreement that the parties intended to create a trust. It was intended that the holdback would be "held in trust" by QSG, kept in a "designated holdback account", and a list of the names of the Pieceworkers together with the balance of the account would be recorded in a "Holdback Summary Notice".

As of May 2, 2023, Local 183 was displaced by the Carpenters' Union to represent Pieceworkers engaged in hardwood, carpet, and resilient floor covering piecework for QSG. It is essential to note that despite the change of union representation, QSG never returned the Holdback Funds to the Pieceworkers. It is the position of the Carpenter' Union that the Pieceworkers Holdback Funds continue to be held in trust by QSG.

The Carpenters' Union respectfully requests answers to the above listed questions.

We are looking forward to hearing back from you.

Sincerely,



Daniel Wright

Lawyer
Rousseau Mazzuca LLP

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From: Besant, Chris <cbesant@grllp.com>
Sent: Wednesday, September 20, 2023 7:49 AM
To: Daniel Wright <Dwright@RousseauMazzuca.com>
Cc: Ella Price <Ella@RousseauMazzuca.com>
Subject: RE: QSG - Carpenters Holdback CCAA - CV-23-00703933-00CL

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Chris Besant • Partner

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From: Daniel Wright [<mailto:Dwright@RousseauMazzuca.com>]

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To: Besant, Chris

Cc: Ella Price

Subject: RE: QSG - Carpenters Holdback CCAA - CV-23-00703933-00CL

Good morning, Chris,

I'm following up to the email below.

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Daniel Wright

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From: Daniel Wright

Sent: September 18, 2023 2:15 PM

To: Besant, Chris <cbesant@grllp.com>

Cc: Ella Price <Ella@RousseauMazzuca.com>

Subject: QSG - Carpenters Holdback CCAA - CV-23-00703933-00CL

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Thank you,



Daniel Wright

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From: [Demetrios Yiokaris](#)
To: [Besant, Chris](#); [L. Joseph Latham \(jlatham@goodmans.ca\)](#)
Cc: [Michael Mazzuca](#); [Daniel Wright](#); [Graham Williamson](#)
Subject: RE: QSG
Date: Sunday, September 17, 2023 5:28:09 PM
Attachments: [email_logo_130_64_5db7375d-510d-48d5-8d7d-a7f67d95887d1111.png](#)

Chris and Joe,

I write regarding the holdback obligations of the company; and seek responses to four questions below.

As indicated in our affidavit served a few weeks ago, Article 17.08 of the Collective Agreement allows QSG to withhold an amount from the Piecworker from their earned compensation of up to \$2,000 for payment of any back charges or deficiencies. These funds are owned by the Piecworker, not the company. Moreover, these funds are to be held in trust in a separate holdback account. Also, every month, QSG is to provide any accounting as to the holdback amounts they are currently holding in trust. Article 17.08 of the Collective Agreement provides:

17.08 - Holdback Account

(a) The Company may at its option **withhold an amount from the Piecworker**/Subcontractor not to exceed the sum of two thousand (\$2,000.00) for payment of any back charges or deficiencies. The said amount may be withheld for a period not to exceed six (6) months from the date of commencement of work by the Piecworker/Subcontractor for the Company or three (3) months from the time that the Piecworker/Subcontractor no longer works for the Company, whichever is the greater.

(b) It is understood that any **holdback referred to in subparagraph (a) above consists of amounts owing to the Piecworker/Subcontractor**, subject to the provisions of Article 17.06 or subparagraph (a) above. **When, for the purpose of establishing a holdback, amounts are deducted from the invoiced totals owing to Piecworkers/Subcontractors**, written notice shall thereafter be given to the Piecworker/Subcontractor and the Union of the amounts designated for holdback. When amounts are deducted from holdback as a result of back charges or deficiencies, written notice shall thereafter be given to the Piecworker/Subcontractor and the Union of the amount of such deduction.

(c) By no later than the 15th day of each month each Company which **maintains a holdback account for any Piecworker/Subcontractor** covered by this Collective Agreement **shall provide a Holdback Summary Notice. The Holdback Summary Notice shall list the names of each Piecworkers/Subcontractors for whom the Company has a holdback account; together with the balance of the holdback account as of the last day of the month.** The Holdback Summary Notice shall stipulate a final total of the holdback amounts held back by the Company for all Piecworkers/Subcontractors.

(d) There shall be no penalty for the first violation by a Company of subparagraphs (b) and (c) during the life of this Collective Agreement. If, during the life of this Collective Agreement, the Company should breach subparagraph (b) or (c) a second time they shall pay damages to the

Union of one hundred dollars (\$100.00), and five hundred dollars (\$500.00) for each violation thereafter. [emphasis added]

Attached at Exhibit G to the affidavit we filed is the Holdback Summary Notice prepared by QSG with respect to the Local 183 Pieceworkers as of June 30, 2023, which was sent around July 15, 2023. The total amount as of the end of June 2023 was \$90,000. I anticipate the amount currently being held in trust is probably around that amount.

Please confirm:

- a. why these monies were not listed on the company's asset sheet, or in the list of creditors;
- b. what happened to this holdback money?;
- c. were the funds ever held back into a separate account?; and,
- d. does the company agree that the intent of the Collective Agreement and/or Article 17.08 is to set up a trust?

Regards,



Demetrios Yiokaris (he/him)

T: +1 416-595-2130 | F: +1 416-204-2810 | E: dyiokaris@kmlaw.ca

Koskie Minsky LLP, 20 Queen Street West, Suite 900, Toronto, ON. M5H 3R3

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**WAYGAR CAPITAL INC., AS AGENT FOR
NINEPOINT CANADIAN SENIOR DEBT
MASTER FUND L.P.**

and

**QUALITY RUGS OF CANADA
LIMITED et al.**

Applicant

Respondents

Court File No. CV-23-00703933-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

Proceeding commenced at TORONTO

**RESPONDING MOTION RECORD OF
CARPENTERS' UNION
(RE: HOLDBACK)**

ROUSSEAU MAZZUCA LLP
65 Queen Street West, Suite 600
Toronto, ON M5H 2M5
Tel: 416-304-9899
Fax: 437-800-1453

Michael C. Mazzuca LSO# 56283V
Email: michael@rousseaumazzuca.com

Daniel J. Wright LSO# 87443L
Email: dwright@rousseaumazzuca.com

Lawyers for the United Brotherhood of Carpenters and
Joiners of America