ONTARIO SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

COUNSEL/ENDORSEMENT SLIP

COURT FILE NO.: BK-26-03364251-0032 **DATE: October 26, 2026**

NO. ON LIST: 6

TITLE OF PROCEEDING: National Traffic Safety Management Inc.

BEFORE: JUSTICE J. DIETRICH

PARTICIPANT INFORMATION

For Plaintiff, Applicant, Moving Party:

Name of Person Appearing	Name of Party	Contact Info

For Defendant, Respondent, Responding Party:

Name of Person Appearing	Name of Party	Contact Info
Harvey Chaiton Maleeha Anwar Maya Poliak	National Traffic Safety Management Inc.	Harvey@chaitons.com MAnwar@chaitons.com maya@chaitons.com

For Other, Self-Represented:

Name of Person Appearing	Name of Party	Contact Info
John Leslie	Oxygen Working Capital	jleslie@dwlaw.com
Haddon Murray	A2 Capital Group Inc.	haddon.murray@gowlingwlg.com
Robert Drake	LIUNA Locals 183 and 506.	rdrake@kmlaw.ca,
Jeff Larry Dillon Gohil	Counsel to the Proposal Trustee	jeff.larry@paliareroland.com dillon.gohil@paliareroland.com
Danielle Stampley	LiUNA Local 837	dstampley@wrighthenry.ca
Caitlin Fell	Ramudden Canada (Global) Inc. proposed purchaser	cfell@reconllp.com

Jeffrey Berger Bryan A. Tannenbaum Nisan Thurairatnam	TDB Restructuring Limited, Proposal Trustee.	jberger@tdbadvisory.ca btannenbaum@tdbadvisory.ca nthurairatnam@tdbadvisory.ca
Jeffrey Levine	Counsel for the Proposed DIP Lender, Cor Financial Corp	jeffrey.levine@mcmillan.ca
Janine Grossman	J9 investments.	agrossmanconsulting@gmail.com

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ENDORSEMENT OF JUSTICE J. DIETRICH:

[1] TDB Restructuring Limited ("**TDB**") as Proposal Trustee (the "**Proposal Trustee**") in the Notice of Intention to Make a Proposal of National Traffic Safety Management (the "**Company**") seeks an order:

(a) approving a sale transaction (the "**Proposed Transaction**") between the Company and Ramudden Global Canada Inc. ("**Ramudden**") contemplated by a binding letter of intent (the "**LOI**") dated October 16, 2026 and vesting the purchased assets in Ramudden upon closing of the Proposed Transaction;

(b) authorizing and directing the Company to complete the Proposed Transaction and to the extent necessary authorizing the Proposal Trustee to take steps on behalf of the Company to complete the Proposed Transaction;

(c) increasing the Administration Charge granted in these proceedings from $200,000 to $300,000;

(d) approving the fees and disbursements of the Proposal Trustee and its counsel as set out in affidavits attached to the Seventh Report;

(e) authorizing payment of outstanding fees subject to the Administration Charge (including as amended) prior to the Company's possible assignment into bankruptcy;

(f) granting a first-ranking charge over the Company's assets to secure the fees and disbursements of TDB, in its capacity as the prospective trustee in bankruptcy of the Company and its counsel upon the Company's contemplated bankruptcy (the "**Bankruptcy Trustee's Charge**"), to secure their reasonable professional fees and disbursements, which charge shall be in priority to all other claims and interests in the assets of the Company; and

(g) sealing the Confidential Appendices to the Sixth Report of the Proposal Trustee dated October 21, 2026 ("**Sixth Report**") and the Confidential Appendix to the Seventh Report of the Proposal Trustee dated October 23, 2026 (the "**Seventh Report**").

[2] The Labourers' International Union of North America, Local 837 (the "**Union**") supports the motion of the Proposal Trustee. The Union originally filed material expressing concern that the relief sought provide that the Company makes payment of all amounts required to be satisfied under s. 65.13(8) of the BIA upon Closing. This is of specific concern to the Union as its evidence is that the Company has been failing

to honour post-filing obligations to the Union under the Collective Agreement and the Company's debt to the Union has increased by more than $324,000 since the NOI filing. The Union notes that the Proposed Transaction contemplates offers being made to all employees (other than the senior management) and payments necessary to satisfy the relevant amounts owing to the Union. The Union is now supportive of the Proposed Transaction given the terms of the requested order addressing payment of the s. 65.13(8) claims.

[3] The Company has filed material objecting to the relief sought by the Proposal Trustee.

[4] A number of endorsements have been made in this matter previously. The NOI was filed on April 24, 2026 and the 6-month maximum stay period expires today. Given the potential deemed bankruptcy of the Company following today, the Court provided urgent time to hear the Proposal Trustee's motion today.

[5] However, as confirmed by the Proposal Trustee, the Company has filed a holding proposal this afternoon. Therefore the risk of deemed bankruptcy has been addressed. The Company advises that it also has received committed funding and intends to file a substantive proposal and a motion for, among other things, approval of interim financing, in the near term.

[6] There is still urgency. As described in the Sixth Report, the Proposal Trustee established a bidding process for the Company's assets. Two offerors each submitted letters of intent to purchase the Company's assets. One was submitted by A2 Environmental Inc. ("**A2**"), an entity owned by Antonio Bruno, the Company's sole director and officer; and the other by Ramudden, an unrelated entity. The Proposal Trustee has determined that Ramudden's offer represents the most favourable outcome for the Company's creditors and other stakeholders, however, the Company does not agree. The Ramudden Transaction appears to require a closing by November 4, 2026.

[7] The Court has therefore made time on **November 2, 2026 at 11:00 am for 2 Hours (virtual)** to address the matter.

[8] The Company will deliver its material (including a substantive proposal and a motion for interim financing) by no later than noon on Thursday, October 29, 2026. Responding records (and any motions by other stakeholders) are to be delivered by 3:00 pm on Friday, October 30, 2026. The Proposal Trustee is to deliver its report on the proposed relief by 10:00 am on Saturday, October 31, 2026. The Company is to deliver its reply material, if any, by 5:00 pm on Saturday, October 31, 2026. Facta are to be exchanged by 5:00 pm on Sunday, November 1, 2026. All material is to be posted to Case Center as soon as practicable following it's delivery, such that by 5:00 pm on November 1, 2026 all material is to be uploaded.

[9] In the meantime, I am prepared to grant an increase to the Administration Charge as requested by the Proposal Trustee. Order to go in the form signed by me this day.

Date: Oct 26, 2026

Justice J. Dietrich