Court File No. BK-26-03364251-0032

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF NATIONAL TRAFFIC SAFETY MANAGEMENT INC.

SUPPLEMENTARY RESPONDING MOTION RECORD OF LABOURERS' INTERNATIONAL UNION OF NORTH AMERICA, LOCAL 837
(Motion returnable October 26, 2026)

October 26, 2026

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Court File No. BK-26-03364251-0032

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF NATIONAL TRAFFIC SAFETY MANAGEMENT INC.

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SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF NATIONAL TRAFFIC SAFETY MANAGEMENT INC.

AFFIDAVIT OF LAUREN ALLAN

I, Lauren Allan, of the City of Toronto, in the Province of Ontario, AFFIRM:

1. I am a Paralegal at Wright Henry LLP, counsel to the Labourers' International Union of North America, Local 837 ("**Local 837**" or the "**Union**") in relation to this matter, and as such I have knowledge of the matters described herein.

2. I make this affidavit in support of the Proposal Trustee's motion to approve the proposed transaction by Ramudden Global (Canada) Inc. ("**Ramudden**").

3. Attached as Exhibit "A" to this affidavit is an email from Dillon Gohil, counsel for the Proposal Trustee, advising that counsel for National Traffic was informed that there were other potential bidders interested in the purchase of National Traffic on September 9, 2026, and advising that counsel for Ramudden, Caitlin Fell, was added to the service list for this matter on September 10, 2026.

4. I make this affidavit in support of the Union's position on the motion and for no improper purpose.

AFFIRMED BEFORE ME at the City of Toronto, in the Province of Ontario on October 26, 2026 in accordance with O/Reg/431/20, Administering Oath or Declaration Remotely.

Commissioner for Taking Affidavits
(or as may be)
DANIELLE STAMPLEY, LSO# 69487C

LAUREN ALLAN

This is Exhibit "A" referred to in the Affidavit of Lauren Allan affirmed by Lauren Allan at the City of Toronto, in the Province of Ontario, before me on October 26, 2026 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

Commissioner for Taking Affidavits (or as may be)

DANIELLE STAMPLEY, LSO# 69487C

From:	Dillon.Gohil@Paliareroland.com
To:	Alex St. John
Cc:	Jeff.Larry@paliareroland.com; Tracey Henry; Youssef Kodsy; Danielle Stampley; jberger@tdbadvisory.ca; nthurairatnam@tdbadvisory.ca
Subject:	RE: [EXTERNAL] In the Matter of the Notice of Intention to Make a Proposal of National Traffic Safety Management Inc. / Court File No. BK-26-03364251-0032 [IMAN-PRIMANAGE.FID1036201]
Date:	Monday, October 26, 2026 10:23:01 AM
Attachments:	image002.png image003.png

Hi Alex,

Our client advises that Chaitons was informed of other interested parties on September 9; and in response, Chaitons added Ms. Fell to the service list on September 10.

We have not yet received the finalized proposal but will provide it to the service list when we do.

Thanks,
Dillon

Dillon Gohil (he/him)
Paliare Roland Rosenberg Rothstein LLP
(416) 646-6353

From: Alex St. John <astjohn@wrighthenry.ca>
Sent: October 26, 2026 9:39 AM
To: Dillon Gohil <Dillon.Gohil@Paliareroland.com>
Cc: Jeff Larry <Jeff.Larry@paliareroland.com>; Tracey Henry <thenry@wrighthenry.ca>; Youssef Kodsy <YKodsy@wrighthenry.ca>; Danielle Stampley <dstampley@wrighthenry.ca>
Subject: RE: [EXTERNAL] In the Matter of the Notice of Intention to Make a Proposal of National Traffic Safety Management Inc. / Court File No. BK-26-03364251-0032 [IMAN-PRIMANAGE.FID1036201]

Dillon and Jeff –

I appreciate you have a lot on your plate.

It would be helpful to know when the Company was advised there were other potential bidders. I believe it was before the Company's materials disclosing their offer were served to the service list.

Alex

Alex St. John (he/him)
Lawyer
Wright Henry LLP

416 306 8274
astjohn@wrighthenry.ca
wrighthenry.ca
200 Wellington St. West, Suite 602 Toronto, ON M5V 3C7

From: Dillon.Gohil@Paliareroland.com <Dillon.Gohil@Paliareroland.com>
Sent: Sunday, October 25, 2026 10:18 PM
To: emma.wheeler@paliareroland.com; Jeff.Larry@paliareroland.com; cfell@reconllp.com; MAnwar@chaitons.com; jberger@tdbadvisory.ca; nthurairatnam@tdbadvisory.ca; btannenbaum@tdbadvisory.ca; agrossmanconsulting@gmail.com; hmanis@manislaw.ca; eperitz@jaffeperitz.com; bjaffe@jaffeperitz.com; tmollsen@emkay.com; mguertler@emkay.com; jleslie@dickinsonwright.com; Tracey Henry <thenry@wrighthenry.ca>; Alex St. John <astjohn@wrighthenry.ca>; Sinthura Chandramohan <schandramohan@wrighthenry.ca>; Youssef Kodsy <YKodsy@wrighthenry.ca>; rdrake@kmlaw.ca; dresnick@kmlaw.ca; agc-pgc.toronto-tax-fiscal@justice.gc.ca; tessania.lawrence@justice.gc.ca; insolvency.unit@ontario.ca; steven.groeneveld@ontario.ca; osbservice-bsfservice@ised-isde.gc.ca; nicole@simeslaw.com; zarnab@simeslaw.com; lcorne@dwlaw.com; amos.avivi@gmail.com; asim.iqbal@gowlingwlg.com; haddon.murray@gowlingwlg.com
Cc: Harvey@chaitons.com; Maya@chaitons.com; KJones@chaitons.com; Antoinet@chaitons.com; aareej@reconllp.com; jwest@ramuddenglobal-na.com; fdeluca@reconllp.com; skour@reconllp.com
Subject: RE: In the Matter of the Notice of Intention to Make a Proposal of National Traffic Safety Management Inc. / Court File No. BK-26-03364251-0032 [IMAN-PRIMANAGE.FID1036201]

To the Service List,

Attached are the following:

1. Factum of the Proposal Trustee;
2. The corrected appendix to the Seventh Report (the LOI that was previously enclosed was a previous version);
3. Updated Draft Approval and Vesting (AVO) and Ancillary Relief Orders;
4. Schedule to the AVO; and
5. Comparisons to the orders circulated yesterday.

Regards,
Dillon

Dillon Gohil (he/him)
Paliare Roland Rosenberg Rothstein LLP

(416) 646-6353

From: Dillon Gohil
Sent: Saturday, October 24, 2026 6:08 PM
To: Emma Wheeler <emma.wheeler@paliareroland.com>; Jeff Larry <Jeff.Larry@paliareroland.com>; Caitlin Fell <cfell@reconllp.com>; Maleeha Anwar <MAnwar@chaitons.com>; jberger@tdbadvisory.ca; nthurairatnam@tdbadvisory.ca; btannenbaum@tdbadvisory.ca; agrossmanconsulting@gmail.com; hmanis@manislaw.ca; eperitz@jaffeperitz.com; bjaffe@jaffeperitz.com; tmollsen@emkay.com; mguertler@emkay.com; jleslie@dickinsonwright.com; thenry@wrighthenry.ca; astjohn@wrighthenry.ca; schandramohan@wrighthenry.ca; ykodsy@wrighthenry.ca; rdrake@kmlaw.ca; dresnick@kmlaw.ca; agc-pgc.toronto-tax-fiscal@justice.gc.ca; tessania.lawrence@justice.gc.ca; insolvency.unit@ontario.ca; steven.groeneveld@ontario.ca; osbservice-bsfservice@ised-isde.gc.ca; nicole@simeslaw.com; zarnab@simeslaw.com; lcorne@dwlaw.com; amos.avivi@gmail.com; Mr. Asim Iqbal <asim.iqbal@gowlingwlg.com>; haddon.murray@gowlingwlg.com
Cc: Harvey G. Chaiton <Harvey@chaitons.com>; Maya Poliak <Maya@chaitons.com>; Karen Jones <KJones@chaitons.com>; Antoinette De Pinto <Antoinet@chaitons.com>; Asra Areej <aareej@reconllp.com>; Jamie West <jwest@ramuddenglobal-na.com>; Frank DeLuca <fdeluca@reconllp.com>; Sharon Kour <skour@reconllp.com>
Subject: RE: In the Matter of the Notice of Intention to Make a Proposal of National Traffic Safety Management Inc. / Court File No. BK-26-03364251-0032 [IMAN-PRIMANAGE.FID1036201]

To the Service List:

Attached are the two Orders sought by the Proposal Trustee at the motion returnable on Monday, October 26.

Regards,
Dillon

Dillon Gohil (he/him)
Paliare Roland Rosenberg Rothstein LLP
(416) 646-6353

From: Emma Wheeler <emma.wheeler@paliareroland.com>
Sent: Friday, October 23, 2026 4:47 PM
To: Dillon Gohil <Dillon.Gohil@Paliareroland.com>; Jeff Larry <Jeff.Larry@paliareroland.com>; Caitlin Fell <cfell@reconllp.com>; Maleeha Anwar <MAnwar@chaitons.com>; jberger@tdbadvisory.ca; nthurairatnam@tdbadvisory.ca; btannenbaum@tdbadvisory.ca; agrossmanconsulting@gmail.com; hmanis@manislaw.ca; eperitz@jaffeperitz.com; bjaffe@jaffeperitz.com; tmollsen@emkay.com; mguertler@emkay.com; jleslie@dickinsonwright.com; thenry@wrighthenry.ca; astjohn@wrighthenry.ca; schandramohan@wrighthenry.ca; ykodsy@wrighthenry.ca; rdrake@kmlaw.ca; dresnick@kmlaw.ca; agc-pgc.toronto-tax-fiscal@justice.gc.ca; tessania.lawrence@justice.gc.ca; insolvency.unit@ontario.ca; steven.groeneveld@ontario.ca;

osbservice-bsfservice@ised-isde.gc.ca; nicole@simeslaw.com; zarnab@simeslaw.com; lcorne@dwlaw.com; amos.avivi@gmail.com; Mr. Asim Iqbal <asim.iqbal@gowlingwlg.com>; haddon.murray@gowlingwlg.com
Cc: Harvey G. Chaiton <Harvey@chaitons.com>; Maya Poliak <Maya@chaitons.com>; Karen Jones <KJones@chaitons.com>; Antoinette De Pinto <Antoinet@chaitons.com>; Asra Areej <aareej@reconllp.com>; Jamie West <jwest@ramuddenglobal-na.com>; Frank DeLuca <fdeluca@reconllp.com>; Sharon Kour <skour@reconllp.com>
Subject: In the Matter of the Notice of Intention to Make a Proposal of National Traffic Safety Management Inc. / Court File No. BK-26-03364251-0032 [IMAN-PRIMANAGE.FID1036201]

To the Service List:

Attached is the Proposal Trustee's Notice of Motion and Seventh Report for the motion returnable on October 26, 2026. The videoconference details are below.

Zoom details are below:
Meeting ID: 646 8330 2309 Passcode: 548152
https://ca01web.zoom.us/j/64683302309?pwd=hk4renYSbUXbUn41tPpZqSX8FIZNTl.1#success

Thank you,

Paliare Roland | Celebrating 25 Years
Emma Wheeler (She/Her)
Legal Assistant to Shawna Leclair, Dillon Gohil and Pooja Patel

Phone: 416.646.7435
Email: emma.wheeler@paliareroland.com

155 Wellington St. West, 35th Floor
Toronto, ON M5V 3H1

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IN THE MATTER OF NATIONAL TRAFFIC SAFETY MANAGEMENT INC.

Court File No. BK-26-03364251-0032

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

PROCEEDING COMMENCED AT
TORONTO

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IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF NATIONAL TRAFFIC SAFETY MANAGEMENT INC.
Applicant

Court File No. BK-26-03364251-0032

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

PROCEEDING COMMENCED AT
TORONTO

SUPPLEMENTARY RESPONDING MOTION RECORD OF LABOURERS' INTERNATIONAL UNION OF NORTH AMERICA, LOCAL 837

(Motion returnable October 26, 2026)

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