

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

B E T W E E N:

FIRST SOURCE FINANCIAL MANAGEMENT INC.

Applicant

- and -

BLOCK 80 HOLDINGS INC. and ANDRE SHERMAN

Respondents

**APPLICATION UNDER section 243(1) of the *Bankruptcy and Insolvency Act*,
R.S.C. 1985, c. B-3, and section 101 of the *Courts of Justice Act*,
R.S.O. 1990, c. C.43**

AFFIDAVIT OF CANDACE BAUMTROG

I, Candace Baumtrog, of the City of Toronto in the Province of Ontario,
SOLEMNLY AFFIRM AS FOLLOWS:

1. I am the legal assistant to Ryan Shah, counsel to First Source Financial Management Inc. (the "**Lender**"). As such, I have personal knowledge of the matters set out in this affidavit. Where I do not have personal knowledge, I state the source of my information and I believe it to be true.
2. I affirm this affidavit in support of the Lender's application for the appointment of a receiver over certain real property owned by Block 80 Holdings Inc. and judgment against Block 80 Holdings Inc. and Andre Sherman (the "**Application**").

A. Position of 2070409 Ontario Inc.

1. On July 4, 2024, Mr. Shah emailed Sharoon Gill, counsel to 2070409 Ontario Inc. (the “**Second Mortgagee**”), to inquire whether the Second Mortgagee would be opposing the Application. Mr. Shah included a link to the Lender’s application record in connection with the Application. I attach a copy of Mr. Shah’s July 4, 2024 email (on which I was copied) to my affidavit as **Exhibit A**.

2. On July 5, 2024, Mr. Gill responded to Mr. Shah to advise that the Second Mortgagee would not be opposing the Application. A copy of this email (on which I was copied) is included in the thread attached as Exhibit A.

AFFIRMED remotely by Candace Baumtrog at the City of Toronto in the Province of Ontario, before me at the City of Toronto, in the Province of Ontario, on this 5th day of July, 2024 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely



Commissioner for Taking Affidavits
Ryan Shah (LSO# 88250C)



Candace Baumtrog

This is **Exhibit "A"**
in the Affidavit of Candace Baumtrog
affirmed the 5th day of July, 2024



Commissioner for Taking Affidavits, etc.

Ryan Shah (LSO # 88250C)

Ryan Shah

From: Sharoon Gill <sgill@oakmontlaw.com>
Sent: July 5, 2024 9:45 AM
To: Ryan Shah
Cc: Jeff Larry; Candace Baumtrog
Subject: Re: Block 80 Receivership Application [IMAN-PRIMANAGE.FID415161]

External Sender - From: (Sharoon Gill <sgill@oakmontlaw.com>)

This message came from outside your organisation.

Hi Ryan:

Please be advised that my client will not be opposing your client's application.

Regards,

SHAROON J. GILL

[106-3410 South Service Road, Burlington, Ontario, L7N 3T2](#)

Tel: [289-812-1020](#) x.301|Fax: [289-812-1027](#)|Toll Free Fax: [1-866-307-0314](#)|Email: sgill@oakmontlaw.com

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Sent from my iPhone

On Jul 4, 2024, at 4:40 PM, ryan.shah@paliareroland.com wrote:

Hi Sharoon:

Can you please confirm that your client, 2070409 Ontario Inc., is not opposing the relief sought in my client's application (as set out in the Notice of Application contained in its application record at this link: <https://www.imanageshare-ca.com/pd/26e6YJyaDLt>)?

Regards,

Ryan

<image001.png>

Ryan Shah
Associate

Phone: 647-865-4702

Email: ryan.shah@paliarerland.com

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

paliarerland.com

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FIRST SOURCE FINANCIAL MANAGEMENT INC.
Applicant

-and-

BLOCK 80 HOLDINGS INC. et al.
Respondents

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AFFIDAVIT OF CANDACE BAUMTROG

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