

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

BETWEEN:

**1599285 ONTARIO LIMITED., RICK BERWICK, 2702749 ONTARIO INC., PETER ADAMO, CROCETTA ADAMO, ANJAY LIMITED, A-ONE AUTO INVESTMENTS INC., CINZIA SORRENTI, ELCRM HOLDINGS INC., SERGIO MOLELLA, DONALD IERFINO, PIERINA PIZZARDI, PIZZARDI INVESTMENTS, AMOND MANAGEMENT INC., SALISI INVESTMENTS INC., LORENZO ANTONINI, CARMEN ANTONINI, TINA BETTI, ANTHONY BONDI GIUSEPPA BONDI, C.P.M.C MARQUEZ HOLDINGS INC., FREDY ROSSI, 2438747 ONTARIO LIMITED, 2205633 ONTARIO LIMITED, 1620375 ONTARIO LIMITED, 1288601 ONTARIO LIMITED, AMSTEL MANUFACTURING (1993) INC., BRUCE MCKINLAY, SALISI INVESTMENTS LTD., M ANTONINI HOLDINGS INC., GABRIELE PIZZARDI, IMPERIO SA HOLDINGS INC., RONALD CHEMIJ, MARY CHEMIJ, TERRY CHEMIJ, LUBA CHEMIJ, and TAXMART INC.**

Applicants

-and-

**1000195736 ONTARIO LTD., 1000193772 ONTARIO LTD., and MORGIS CORPORATION**

Respondents

**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**

1. On July 5, 2024, by Order of the Honourable Justice Cavanagh, TDB Restructuring Limited (“TDB”) was appointed as Receiver (in such capacity, the “Receiver”) over the Respondents, 1000195736 Ontario Ltd., 1000193772 Ontario Ltd., and Morgis Corporation (collectively the “Debtors”), pursuant to section 243 of the *Bankruptcy and Insolvency Act* and section 101 of the *Courts of Justice Act*.

2. In August 2025, the Receiver brought a motion seeking, *inter alia*, two Approval and Vesting Orders (the “**AVOs**”) in respect of the sale of the Debtors’ principal assets (comprising real property located in Toronto, Ontario), approval of the Receiver’s First Report dated August 12, 2025 (the “**First Report**”), its activities and fees, and those of its counsel, and a discharge order.

3. The motion was adjourned on consent twice to permit the Debtors an opportunity to pursue a refinancing transaction (the “**Kell Refinancing**”) and seek a discharge of the receivership.

4. Ultimately, the Kell Refinancing was not completed. On November 20, 2025, the Honourable Justice Cavanagh granted the AVOs, while the balance of the relief originally sought by the Receiver was deferred until completion of the transactions contemplated therein (the “**Transactions**”).

5. The Transactions have now closed, and the Receiver’s primary mandate has been completed. The remaining steps are incidental administrative matters.

6. The Receiver now brings this motion seeking approval of its First Report, its Second Report dated May 6, 2026 (the “**Second Report**”), its activities, fees and disbursements (for the Receiver and its counsel), receipts and disbursements, and its discharge upon completion of the remaining administrative matters as set out in its Second Report.

7. This is a routine motion to conclude the receivership proceedings, and there is no opposition to the motion. In the circumstances, the Receiver respectfully submits that the relief sought is appropriate and consistent with standard Commercial List practice.

May 12, 2026

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TDB Restructuring Limited.

TO: **THE SERVICE LIST**

**SERVICE LIST**  
(As at November 20, 2025)

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