

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
BANKRUPTCY AND INSOLVENCY**

IN THE MATTER OF THE BANKRUPTCY OF THOMAS DYLAN SUITOR, an individual  
with a locality of Burlington, Ontario

**AIDE MEMOIRE OF DYLAN SUITOR, THE DEBTOR  
(Chambers Appointment – 13 June 2025)**

1. This Aide Memoire is being filed by the Debtor, Dylan Sutor (“**Sutor**”) in connection with the chambers appointment scheduled for 10:30 am on 13 June 2025, and in response to the Aide Memoire filed by The Fuller Landou Group Inc. (“**Fuller**”) that was served on 12 June 2025 at 11:35 am (the “**Fuller Aide Memoire**”).

2. Fuller is seeking an adjournment of Sutor’s motion regarding payment of his counsel’s fees (the “**Debtor Fees Approval Motion**”) that is returnable on 16 June 2025. Sutor does not oppose the adjournment, but takes issue with the mischaracterization in the Fuller Aide Memoire.

3. Fuller alleges three grounds for granting the adjournment: (a) that Sutor failed to serve its motion record on “all parties potentially impacted” by the Debtor Fees Approval Motion, (b) that Sutor “short served” its motion record for the Debtor Fees Approval Motion and failed to serve a factum, and (c) that the motion may be moot if the Interim Receiver sales process motion order is not granted. Only the third issue is accurately described.

**A. SUITOR DID NOT FAIL TO SERVE THE RELEVANT PARTIES**

4. Fuller’s allegation that Sutor failed to serve “all parties potentially impacted by the [Debtor Fees Approval Motion]” is highly misleading.

5. Sutor did serve its motion record on the most up-to-date version of the service list in this matter (the “**Service List**”). A copy of the Sutor’s counsel’s email dated 9 June 2025 to the Service List is attached at **Tab 1**. A copy of the Service List maintained on the Interim Receiver, TDB Advisory Limited’s website in connection with this matter is attached at **Tab 2**.

6. Sutor has made best efforts to ensure that all relevant parties have a copy of the motion record. On receiving Fuller’s email on 11 June 2025 dated 10:56 am that relevant parties were not served, Sutor’s counsel responded on the same day at 11:27 am advising that the Service List was served and asking if there was a more up to date version. Fuller has not responded to this email to date. A copy of this email exchange dated 11 June 2025 is attached at **Tab 3**.

7. Fuller’s failure to disclose this relevant information in its Aide Memoire served *after this email exchange* is at best misleading and at worst a transparent attempt to improperly blame Sutor for the need for an adjournment.

8. It is noteworthy that Fuller alleges Sutor failed to serve all relevant parties with its motion material, but in serving its Aide Memoire on this conference, it failed to serve all of Sutor’s counsel, including counsel listed in the endorsement attached at Appendix 2 of its Aide Memoire and who has been corresponding with Fuller’s respecting this case conference (see, e.g. **Tab 4**).

## **B. SUITOR’S “SHORT SERVICE” IS NOT GROUNDS FOR THIS ADJOURNMENT**

9. Fuller’s allegations that Sutor “short served” its motion record and failed to serve a factum are also misleading. Fuller omits that:

- a. The 16 June 2025 motion was scheduled to hear Sutor’s motion for approval of fees *as well as Fuller’s request for full indemnity costs of the motion for the appointment of the Interim Receiver* (the “**Fuller Fees Relief**”).

- b. Suitor served its motion record on 9 June 2025 at 4:49 pm (7 days prior to the 16 June 2025 motion) and no party has served any motion material in connection with the Fuller Fees Relief.
- c. Fuller's has provided no timeline for service of any motion materials in connection with the Fuller Fees Relief.
- d. Fuller has made no request for cross-examinations to date.

10. While Suitor admits that it served its motion materials just short of the 7 clear days requirement under the *Rules*, the parties throughout these proceedings have served materials contrary to the strict requirements under the *Rules* as is often done in bankruptcy proceedings and urgent matters before the Commercial List. Fuller's own Aide Memoire was served at 11:12 am on 12 June 2025 just 24 hours before this case conference contrary to s. 35 of the Consolidated Practice Directions, despite knowing of the alleged "short service" since 9 June 2025.

11. Similarly, Suitor admits that it has not served a factum in connection with its motion to date. Fuller has also not served a factum in connection with the Fuller Fee Relief. In the interests of efficiency and costs savings, these factums should be due after: (a) a sales process is approved – otherwise, Suitor's requested relief would be rendered moot, and (b) the evidentiary record in connection with the Fuller Fee Relief and the Suitor motion is set.

### **C. THE SUITOR ALLEGATIONS ARE UNNECESSARY**

12. Fuller's allegations against Suitor were not necessary on this case conference. Suitor readily agreed that an adjournment of its motion was appropriate given that the motion to approve the sale process has recently been extended (see **Tab 4**). Fuller's inclusion of unnecessary allegations against Suitor, which it disseminated to the expansive Service List (including Suitor's creditors) necessitate this response to the set the record straight.



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**Bankruptcy of Thomas Dylan Suitor | BK-24-00208718-OT31**

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**From** Cristina Garisto <cristina@taplaw.ca>

**Date** Mon 2025-06-09 4:49 PM

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**Cc** Tanya Pagliaroli <tanya@taplaw.ca>; Alexandra Grishanova <alexandra@taplaw.ca>; Vinayak Mishra <vmishra@albatrosslaw.ca>

 1 attachment (9 MB)

Motion Record - Suitor - 09-JUN-2025.pdf;

Good afternoon,

Attached please find a Motion Record with respect to the motion to approve legal fees returnable June 16, 2025, served upon you pursuant to the *Rules of Civil Procedure*.

Thank you,

**Cristina Garisto**

Law Clerk

416-583-2010

[cristina@taplaw.ca](mailto:cristina@taplaw.ca)



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**ONTARIO  
SUPERIOR COURT OF JUSTICE  
IN BANKRUPTCY AND INSOLVENCY**

**IN THE MATTER OF THE BANKRUPTCY  
OF THOMAS DYLAN SUITOR, an individual  
with a locality of Burlington, Ontario**

**SERVICE LIST**

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**Email Service List****(As of January 15, 2025)**

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Outlook

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**RE: Bankruptcy of Thomas Dylan Suitor | BK-24-00208718-OT31**

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**From** Cristina Garisto <cristina@taplaw.ca>

**Date** Wed 2025-06-11 11:27 AM

**To** Jennifer Stam (she/her) <jennifer.stam@nortonrosefulbright.com>

 1 attachment (360 KB)

Suitor-Bankruptcy-Service-ListCAN\_DMS\_1006972234.4 (2).pdf;

Hi Jennifer,

The Service List used is the one posted on the TDB Advisory website. I am attaching it for reference.

If there is a more updated version of same, would you please provide it to me?

Thank you,

**Cristina Garisto**

Law Clerk

416-583-2010

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**From:** Jennifer Stam (she/her) <jennifer.stam@nortonrosefulbright.com>

**Sent:** June 11, 2025 10:56 AM

**To:** Cristina Garisto <cristina@taplaw.ca>; Tanya Pagliaroli <tanya@taplaw.ca>; Vinayak Mishra <vmishra@albatrosslaw.ca>

**Cc:** gabrahamson@fullerllp.com; Fred Tayar <fred@fredtayar.com>; jberger@tdbadvisory.ca; James Renihan (he/him) <james.renihan@nortonrosefulbright.com>; george@chaitons.com; Mario Forte <mforte@reconllp.com>; Corney, Patrick <pcorney@millerthomson.com>; Lauren Archibald (she/her) <lauren.archibald@nortonrosefulbright.com>

**Subject:** RE: Bankruptcy of Thomas Dylan Sutor | BK-24-00208718-OT31

Tanya

We are in receipt of your motion.

The short service of the motion does not provide sufficient time for response to the many issues contained in your motion and there has also been no factum filed. Additionally, as the sale process motion remains pending, our view is that the June 16 court date for this motion should be adjourned to a date after the sale process motion is determined and a timetable should be set. We also note that the motion does not appear to have been served on the full service list and notably, you seem to be missing the interim receiver's counsel as well as a number of the mortgagees who would be impacted by the relief sought.

We will be reaching out to the court to see whether there is availability for a **9:30 appointment tomorrow or Friday to seek the adjournment** – please advise ASAP whether you are unavailable either of those days. We will copy you on our email to the court.

**Jennifer Stam**

Partner

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**NORTON ROSE FULBRIGHT**

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**From:** Cristina Garisto <[cristina@taplaw.ca](mailto:cristina@taplaw.ca)>

**Sent:** June 9, 2025 4:49 PM

**To:** [gabrahamson@fullerllp.com](mailto:gabrahamson@fullerllp.com); [aerlich@fullerllp.com](mailto:aerlich@fullerllp.com); [ashah@fullerllp.com](mailto:ashah@fullerllp.com); Jennifer Stam (she/her) <[jennifer.stam@nortonrosefulbright.com](mailto:jennifer.stam@nortonrosefulbright.com)>; James Renihan (he/him) <[james.renihan@nortonrosefulbright.com](mailto:james.renihan@nortonrosefulbright.com)>; Evan Cobb (he/him) <[evan.cobb@nortonrosefulbright.com](mailto:evan.cobb@nortonrosefulbright.com)>; Lauren Archibald (she/her) <[lauren.archibald@nortonrosefulbright.com](mailto:lauren.archibald@nortonrosefulbright.com)>; [dylan@elevationrealty.ca](mailto:dylan@elevationrealty.ca); Tanya Pagliaroli <[tanya@taplaw.ca](mailto:tanya@taplaw.ca)>; [ngoldstein@ksvadvisory.com](mailto:ngoldstein@ksvadvisory.com); [dsieradzki@ksvadvisory.com](mailto:dsieradzki@ksvadvisory.com); [nelzakhem@ksvadvisory.com](mailto:nelzakhem@ksvadvisory.com); [rjacobs@cassels.com](mailto:rjacobs@cassels.com); [jbellissimo@cassels.com](mailto:jbellissimo@cassels.com); [skukulowicz@cassels.com](mailto:skukulowicz@cassels.com); [jberger@tdbadvisory.ca](mailto:jberger@tdbadvisory.ca); [btannenbaum@tdbadvisory.ca](mailto:btannenbaum@tdbadvisory.ca); [george@chaitons.com](mailto:george@chaitons.com); [dim@chaitons.com](mailto:dim@chaitons.com); [forte@gsnh.com](mailto:forte@gsnh.com); [drake@gsnh.com](mailto:drake@gsnh.com); [kplunkett@airdberlis.com](mailto:kplunkett@airdberlis.com); [mvanzandvoort@airdberlis.com](mailto:mvanzandvoort@airdberlis.com); [sparsons@airdberlis.com](mailto:sparsons@airdberlis.com); [irmaboyle1@gmail.com](mailto:irmaboyle1@gmail.com); [goetz@hotmai.com](mailto:goetz@hotmai.com); [sofia.m.neves@gmail.com](mailto:sofia.m.neves@gmail.com); [dan.uszynski@outlook.com](mailto:dan.uszynski@outlook.com); [christophermonteiro@hotmail.com](mailto:christophermonteiro@hotmail.com); [gagnonj20@gmail.com](mailto:gagnonj20@gmail.com); [kathy.glaser@sympatico.ca](mailto:kathy.glaser@sympatico.ca); [heidi@makeagreatday.ca](mailto:heidi@makeagreatday.ca); [annemarieblinco@hotmail.com](mailto:annemarieblinco@hotmail.com); [kerrreiki@yahoo.ca](mailto:kerrreiki@yahoo.ca); [eflodrowski@gmail.com](mailto:eflodrowski@gmail.com); [bmary806@gmail.com](mailto:bmary806@gmail.com); [davidpgriffiths3@gmail.com](mailto:davidpgriffiths3@gmail.com); [haliflats@gmail.com](mailto:haliflats@gmail.com); [alisonchaps2@gmail.com](mailto:alisonchaps2@gmail.com)

**Cc:** Tanya Pagliaroli <[tanya@taplaw.ca](mailto:tanya@taplaw.ca)>; Alexandra Grishanova <[alexandra@taplaw.ca](mailto:alexandra@taplaw.ca)>; Vinayak Mishra <[vmishra@albatrosslaw.ca](mailto:vmishra@albatrosslaw.ca)>

**Subject:** Bankruptcy of Thomas Dylan Sutor | BK-24-00208718-OT31

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Good afternoon,

Attached please find a Motion Record with respect to the motion to approve legal fees returnable June 16, 2025, served upon you pursuant to the *Rules of Civil Procedure*.

Thank you,

**Cristina Garisto**

Law Clerk

416-583-2010

[cristina@taplaw.ca](mailto:cristina@taplaw.ca)



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Toronto, Ontario M5V 1Z4  
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**Re: Bankruptcy of Thomas Dylan Suitor | BK-24-00208718-OT31**

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**From** Vinayak Mishra <vmishra@albatrosslaw.ca>

**Date** Wed 2025-06-11 12:54 PM

**To** Jennifer Stam (she/her) <jennifer.stam@nortonrosefulbright.com>; Cristina Garisto <cristina@taplaw.ca>; Tanya Pagliaroli <tanya@taplaw.ca>

**Cc** gabrahamson@fullerllp.com <gabrahamson@fullerllp.com>; Fred Tayar <fred@fredtayar.com>; jberger@tdbadvisory.ca <jberger@tdbadvisory.ca>; James Renihan (he/him) <james.renihan@nortonrosefulbright.com>; george@chaitons.com <george@chaitons.com>; Mario Forte <mforte@reconllp.com>; Corney, Patrick <pcorney@millerthomson.com>; Lauren Archibald (she/her) <lauren.archibald@nortonrosefulbright.com>

Hi Jennifer,

You can sign on my behalf.

Thanks,  
Vin

**Vinayak Mishra**  
Lawyer and Founder  
[vmishra@albatrosslaw.ca](mailto:vmishra@albatrosslaw.ca)  
(416) 322-7176

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**From:** Jennifer Stam (she/her) <jennifer.stam@nortonrosefulbright.com>

**Sent:** June 11, 2025 12:48 PM

**To:** Vinayak Mishra <vmishra@albatrosslaw.ca>; Cristina Garisto <cristina@taplaw.ca>; Tanya Pagliaroli <tanya@taplaw.ca>

**Cc:** gabrahamson@fullerllp.com <gabrahamson@fullerllp.com>; Fred Tayar <fred@fredtayar.com>; jberger@tdbadvisory.ca <jberger@tdbadvisory.ca>; James Renihan (he/him) <james.renihan@nortonrosefulbright.com>; george@chaitons.com <george@chaitons.com>; Mario Forte <mforte@reconllp.com>; Corney, Patrick <pcorney@millerthomson.com>; Lauren Archibald (she/her) <lauren.archibald@nortonrosefulbright.com>

**Subject:** RE: Bankruptcy of Thomas Dylan Suitor | BK-24-00208718-OT31

Thanks Vin – attached is our request form – can you please either sign it ASAP or confirm I can sign it on your behalf so we can meet Alsou's deadline of submitting it before 1pm? Thanks.

**Jennifer Stam**

Partner

Norton Rose Fulbright Canada LLP / S.E.N.C.R.L., s.r.l.

222 Bay Street, Suite 3000, P.O. Box 53, Toronto ON M5K 1E7 Canada

T: +1 416.202.6707 | F: +1 416.216.3930

[jennifer.stam@nortonrosefulbright.com](mailto:jennifer.stam@nortonrosefulbright.com)**NORTON ROSE FULBRIGHT**

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**From:** Vinayak Mishra <vmishra@albatrosslaw.ca>**Sent:** June 11, 2025 11:30 AM**To:** Jennifer Stam (she/her) <jennifer.stam@nortonrosefulbright.com>; Cristina Garisto <cristina@taplaw.ca>; Tanya Pagliaroli <tanya@taplaw.ca>**Cc:** gabrahamson@fullerllp.com; Fred Tayar <fred@fredtayar.com>; jberger@tdbadvisory.ca; James Renihan (he/him) <james.renihan@nortonrosefulbright.com>; george@chaitons.com; Mario Forte <mforte@reconllp.com>; Corney, Patrick <pcorney@millerthomson.com>; Lauren Archibald (she/her) <lauren.archibald@nortonrosefulbright.com>**Subject:** Re: Bankruptcy of Thomas Dylan Suitor | BK-24-00208718-OT31

Hi Jennifer,

We are available on both days, and we are fine with adjourning the motion pending the sales process motion.

Thanks,  
Vin**Vinayak Mishra**

Lawyer and Founder

[vmishra@albatrosslaw.ca](mailto:vmishra@albatrosslaw.ca)

(416) 322-7176

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**From:** Jennifer Stam (she/her) <jennifer.stam@nortonrosefulbright.com>**Sent:** June 11, 2025 10:56 AM**To:** Cristina Garisto <cristina@taplaw.ca>; Tanya Pagliaroli <tanya@taplaw.ca>; Vinayak Mishra <vmishra@albatrosslaw.ca>**Cc:** gabrahamson@fullerllp.com <gabrahamson@fullerllp.com>; Fred Tayar <fred@fredtayar.com>; jberger@tdbadvisory.ca <jberger@tdbadvisory.ca>; James Renihan (he/him) <james.renihan@nortonrosefulbright.com>; george@chaitons.com <george@chaitons.com>; Mario Forte <mforte@reconllp.com>; Corney, Patrick <pcorney@millerthomson.com>; Lauren Archibald (she/her)



<lauren.archibald@nortonrosefulbright.com>

**Subject:** RE: Bankruptcy of Thomas Dylan Suitor | BK-24-00208718-OT31

Tanya

We are in receipt of your motion.

The short service of the motion does not provide sufficient time for response to the many issues contained in your motion and there has also been no factum filed. Additionally, as the sale process motion remains pending, our view is that the June 16 court date for this motion should be adjourned to a date after the sale process motion is determined and a timetable should be set. We also note that the motion does not appear to have been served on the full service list and notably, you seem to be missing the interim receiver's counsel as well as a number of the mortgagees who would be impacted by the relief sought.

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**Jennifer Stam**

Partner

Norton Rose Fulbright Canada LLP / S.E.N.C.R.L., s.r.l.

222 Bay Street, Suite 3000, P.O. Box 53, Toronto ON M5K 1E7 Canada

T: +1 416.202.6707 | F: +1 416.216.3930

[jennifer.stam@nortonrosefulbright.com](mailto:jennifer.stam@nortonrosefulbright.com)

**NORTON ROSE FULBRIGHT**

---

**From:** Cristina Garisto <cristina@taplaw.ca>

**Sent:** June 9, 2025 4:49 PM

**To:** gabrahamson@fullerllp.com; aerlich@fullerllp.com; ashah@fullerllp.com; Jennifer Stam (she/her) <jennifer.stam@nortonrosefulbright.com>; James Renihan (he/him) <james.renihan@nortonrosefulbright.com>; Evan Cobb (he/him) <evan.cobb@nortonrosefulbright.com>; Lauren Archibald (she/her) <lauren.archibald@nortonrosefulbright.com>; dylan@elevationrealty.ca; Tanya Pagliaroli <tanya@taplaw.ca>; ngoldstein@ksvadvisory.com; dsieradzki@ksvadvisory.com; nelzakhem@ksvadvisory.com; rjacobs@cassels.com; jbellissimo@cassels.com; skukulowicz@cassels.com; jberger@tdbadvisory.ca; btannenbaum@tdbadvisory.ca; george@chaitons.com; dim@chaitons.com; forte@gsnh.com; drake@gsnh.com; kplunkett@airdberlis.com; mvanzandvoort@airdberlis.com; sparsons@airdberlis.com; irmaboyle1@gmail.com; goetzts@hotmail.com; sofia.m.neves@gmail.com; dan.uszynski@outlook.com; christophermonteiro@hotmail.com; gagnonj20@gmail.com; kathy.glaser@sympatico.ca; heidi@makeagreatday.ca; annemarieblinco@hotmail.com; kerrreiki@yahoo.ca; eflodrowski@gmail.com; bmary806@gmail.com; davidpgriffiths3@gmail.com; haliflats@gmail.com; alisonchaps2@gmail.com

**Cc:** Tanya Pagliaroli <tanya@taplaw.ca>; Alexandra Grishanova <alexandra@taplaw.ca>; Vinayak Mishra <vmishra@albatrosslaw.ca>

**Subject:** Bankruptcy of Thomas Dylan Suitor | BK-24-00208718-OT31

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Thank you,

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Law Clerk

416-583-2010

[cristina@taplaw.ca](mailto:cristina@taplaw.ca)



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---

**Re: Bankruptcy of Thomas Dylan Suitor | BK-24-00208718-OT31**

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**From** Vinayak Mishra <vmishra@albatrosslaw.ca>

**Date** Wed 2025-06-11 11:30 AM

**To** Jennifer Stam (she/her) <jennifer.stam@nortonrosefulbright.com>; Cristina Garisto <cristina@taplaw.ca>; Tanya Pagliaroli <tanya@taplaw.ca>

**Cc** gabrahamson@fullerllp.com <gabrahamson@fullerllp.com>; Fred Tayar <fred@fredtayar.com>; jberger@tdbadvisory.ca <jberger@tdbadvisory.ca>; James Renihan (he/him) <james.renihan@nortonrosefulbright.com>; george@chaitons.com <george@chaitons.com>; Mario Forte <mforte@reconllp.com>; Corney, Patrick <pcorney@millerthomson.com>; Lauren Archibald (she/her) <lauren.archibald@nortonrosefulbright.com>

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**Vinayak Mishra**  
Lawyer and Founder  
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Partner

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[jennifer.stam@nortonrosefulbright.com](mailto:jennifer.stam@nortonrosefulbright.com)

**NORTON ROSE FULBRIGHT**

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**Sent:** June 9, 2025 4:49 PM

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**Cc:** Tanya Pagliaroli <tanya@taplaw.ca>; Alexandra Grishanova <alexandra@taplaw.ca>; Vinayak Mishra <vmishra@albatrosslaw.ca>

**Subject:** Bankruptcy of Thomas Dylan Suitor | BK-24-00208718-OT31

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Thank you,

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Law Clerk

416-583-2010

[cristina@taplaw.ca](mailto:cristina@taplaw.ca)



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From: **Lauren Archibald (she/her)** <[lauren.archibald@nortonrosefulbright.com](mailto:lauren.archibald@nortonrosefulbright.com)>

Date: Thu, Jun 12, 2025 at 11:12 AM

Subject: In the Matter of the Bankruptcy of Thomas Dylan Suitor (Court File No.: BK-24-00208718-OT31)

To: [gabrahamson@fullerllp.com](mailto:gabrahamson@fullerllp.com) <[gabrahamson@fullerllp.com](mailto:gabrahamson@fullerllp.com)>, [aerlich@fullerllp.com](mailto:aerlich@fullerllp.com) <[aerlich@fullerllp.com](mailto:aerlich@fullerllp.com)>, [ashah@fullerllp.com](mailto:ashah@fullerllp.com) <[ashah@fullerllp.com](mailto:ashah@fullerllp.com)>, Evan Cobb (he/him) <[evan.cobb@nortonrosefulbright.com](mailto:evan.cobb@nortonrosefulbright.com)>, [dylan@elevationrealty.ca](mailto:dylan@elevationrealty.ca) <[dylan@elevationrealty.ca](mailto:dylan@elevationrealty.ca)>, [tanya@taplaw.ca](mailto:tanya@taplaw.ca) <[tanya@taplaw.ca](mailto:tanya@taplaw.ca)>, [vin@taplaw.ca](mailto:vin@taplaw.ca) <[vin@taplaw.ca](mailto:vin@taplaw.ca)>, [ngoldstein@ksvadisory.com](mailto:ngoldstein@ksvadisory.com) <[ngoldstein@ksvadisory.com](mailto:ngoldstein@ksvadisory.com)>, [dsieradzki@ksvadisory.com](mailto:dsieradzki@ksvadisory.com) <[dsieradzki@ksvadisory.com](mailto:dsieradzki@ksvadisory.com)>,

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[skukulowicz@cassels.com](mailto:skukulowicz@cassels.com) <[skukulowicz@cassels.com](mailto:skukulowicz@cassels.com)>, [jberger@tdbadvisory.ca](mailto:jberger@tdbadvisory.ca)  
<[jberger@tdbadvisory.ca](mailto:jberger@tdbadvisory.ca)>, [btannenbaum@tdbadvisory.ca](mailto:btannenbaum@tdbadvisory.ca) <[btannenbaum@tdbadvisory.ca](mailto:btannenbaum@tdbadvisory.ca)>,  
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<[fred@fredtayar.com](mailto:fred@fredtayar.com)>, [george@chaitons.com](mailto:george@chaitons.com) <[george@chaitons.com](mailto:george@chaitons.com)>, [dim@chaitons.com](mailto:dim@chaitons.com)  
<[dim@chaitons.com](mailto:dim@chaitons.com)>, [forte@gsnh.com](mailto:forte@gsnh.com) <[forte@gsnh.com](mailto:forte@gsnh.com)>, [kplunkett@airdberlis.com](mailto:kplunkett@airdberlis.com)  
<[kplunkett@airdberlis.com](mailto:kplunkett@airdberlis.com)>, [mvanzandvoort@airdberlis.com](mailto:mvanzandvoort@airdberlis.com) <[mvanzandvoort@airdberlis.com](mailto:mvanzandvoort@airdberlis.com)>,  
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[jcarhart@millerthomson.com](mailto:jcarhart@millerthomson.com) <[jcarhart@millerthomson.com](mailto:jcarhart@millerthomson.com)>, [irmaboyle1@gmail.com](mailto:irmaboyle1@gmail.com)  
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<[dan.uszynski@outlook.com](mailto:dan.uszynski@outlook.com)>, [haliflats@gmail.com](mailto:haliflats@gmail.com) <[haliflats@gmail.com](mailto:haliflats@gmail.com)>, [kerrireiki@yahoo.ca](mailto:kerrireiki@yahoo.ca)  
<[kerrireiki@yahoo.ca](mailto:kerrireiki@yahoo.ca)>, [christophermonteiro@hotmail.com](mailto:christophermonteiro@hotmail.com) <[christophermonteiro@hotmail.com](mailto:christophermonteiro@hotmail.com)>,  
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CC: Jennifer Stam (she/her) <[jennifer.stam@nortonrosefulbright.com](mailto:jennifer.stam@nortonrosefulbright.com)>

To the Service List,

Please find attached the Aide Memoire of The Fuller Landau Group Inc., in its capacity as the receiver of the assets, property and undertaking of The Lion's Share Group Inc., which is hereby served upon you pursuant to the *Rules of Civil Procedure* (Ontario).

The Aide Memoire is being served in connection with a chambers appointment scheduled on **Friday, June 13, 2025, beginning at 10:30 a.m.** and will be heard via videoconference. Please advise Lauren Archibald ([lauren.archibald@nortonrosefulbright.com](mailto:lauren.archibald@nortonrosefulbright.com)) if you plan to attend the chambers appointment.

Best regards,  
Lauren

**Lauren Archibald** (*she/her*)  
Associate

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IN THE MATTER OF THE BANKRUPTCY OF THOMAS DYLAN SUITOR, an individual with a locality of Burlington,  
Ontario

Court File No. BK-23-00208718-OT31

***ONTARIO***  
**SUPERIOR COURT OF JUSTICE**  
**BANKRUPTCY AND INSOLVENCY**

**AIDE MEMOIRE OF DYLAN SUITOR**

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