

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

THE HONOURABLE)	WEDNESDAY, THE 24TH
)	
JUSTICE STEELE)	DAY OF SEPTEMBER, 2025

B E T W E E N:

MARSHALLZEHR GROUP INC.

Applicant

- and -

**2301402 ONTARIO LIMITED and JAKE’S HOUSE COMMUNITY
RESIDENCES**

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

ORDER

THIS MOTION, made by TDB Restructuring Limited (“**TDB**”), in its capacity as court-appointed receiver and manager (the “**Receiver**”) without security, of the assets, undertakings, and properties of 2301402 Ontario Limited and Jake’s House Community Residences, pursuant to subsection 243(1) of the *Bankruptcy and Insolvency Act* and section 101 of the *Courts of Justice Act* for an order, *inter alia*:

- a) validating service of the Receiver’s Notice of Motion and Motion Record;
- b) approving an increase in the amount the Receiver may borrow and the Receiver’s Borrowing Charge from \$250,000 to \$1,000,000;

- c) approving the First Report of the Receiver dated September 19, 2025 and the appendices thereto (the “**First Report**”) and the conduct and activities of the Receiver described therein;
- d) approving the fees and disbursements of the Receiver and its counsel; and
- e) approving the Receiver’s interim statement of receipts and disbursements.

was heard this day via Zoom videoconference;

ON READING the Order of Justice Dietrich dated May 14, 2025 (the “**Appointment Order**”), the Notice of Motion dated September 22, 2025, and the First Report, and on hearing the submissions of counsel for the Receiver and counsel for such other parties in attendance at the hearing, all properly served, as appears from the affidavit of service filed in connection with this motion,

SERVICE

1. **THIS COURT ORDERS** that the time for service and filing of the Notice of Motion and the Motion Record is hereby abridged and validated as necessary so that this Motion is properly returnable today and hereby dispenses with further service thereof.

CAPITALIZED TERMS

2. **THIS COURT ORDERS** that capitalized terms not defined herein, shall have the meanings ascribed thereto in the First Report or the Appointment Order, as applicable.

RECEIVER'S BORROWINGS AND RELATED RECEIVER'S BORROWING CHARGE

3. **THIS COURT ORDERS** that the amount the Receiver may borrow and Receiver's Borrowing Charge (as defined in paragraph 21 of the Appointment Order) is hereby be increased from a principal amount of \$250,000 to a principal amount of \$1,000,000.

APPROVAL OF THE RECEIVER'S ACTIVITIES, FEES, RECEIPTS & DISBURSEMENTS

4. **THIS COURT ORDERS** that the First Report and the activities and conduct of the Receiver, as set out in the First Report, be and are hereby approved; provided, however, that only the Receiver, in its personal capacity only with respect to its own personal liability, shall be entitled to rely upon or utilize in any way such approval.

5. **THIS COURT ORDERS** that the fees and disbursements of the Receiver and its counsel, Chaitons LLP, as set out in the First Report, the Affidavit of Jeffrey Berger sworn September 17, 2025, and the Affidavit of Maleeha Anwar sworn September 19, 2025, be and are hereby approved.

6. **THIS COURT ORDERS** that the Receiver's interim statement of receipts and disbursements for the period from May 14, 2025 to September 16, 2025, as set out in the First Report, be and is hereby approved.

7. **THIS COURT HEREBY REQUESTS** the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada, the United States, or any other jurisdiction, to give effect to this Order and to assist the Receiver and its agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Receiver, as an officer of this Court, as may be necessary or desirable to give effect to this Order, to grant

representative status to the Receiver in any foreign proceeding, or to assist the Receiver and its agents in carrying out the terms of this Order.

8. **THIS COURT ORDERS** that the Receiver may apply to this Court to amend, vary or supplement this Order, or for advice and directions with respect to the discharge of its powers and duties under this Order at any time.

9. **THIS COURT ORDERS** that this Order and all of its provisions are effective as of 12:01 a.m. Toronto time on the date of this Order, and this Order is enforceable without the need for entry and filing.

MARSHALLZEHR GROUP INC.

Applicant

- and

**2301402 ONTARIO LIMITED and JAKE'S HOUSE
COMMUNITY RESIDENCES**

Respondents

Court File No. CV-25-00741261-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**
Proceedings commenced at
TORONTO

ORDER

CHAITONS LLP

5000 Yonge Street, 10th Floor
Toronto, ON M2N 7E9

Harvey Chaiton (LSO No. 21592F)

Tel: (416) 218-1129

Email: harvey@chaitons.com

Danish Afroz (LSO No. 65786B)

Tel: (416) 218-1137

Email: dafroz@chaitons.com

Maleeha Anwar (LSO No. 92961B)

Tel: (416) 218-1128

Email: MAнвар@chaitons.com

**Lawyers for TDB Restructuring Limited, in
its capacity as Court-Appointed Receiver**