

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

B E T W E E N:

UBC SOLUTIONS INCORPORATED

Applicant

- and -

**1680 BRIMLEY LIMITED PARTNERSHIP, 2808908 ONTARIO INC. and BRIMLEY
PROGRESS DEVELOPMENTS INC.**

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

**NON-CONFIDENTIAL SUPPLEMENTARY RESPONDING MOTION RECORD OF
1680 BRIMLEY LIMITED PARTNERSHIP, 2808908 ONTARIO INC. &
BRIMLEY PROGRESS DEVELOPMENTS INC.**

(Receiver's Sale Approval Hearing returnable on September 18th, 2026)

Date: July 20th, 2026

BLANEY MCMURTRY LLP
Lawyers
2 Queen Street East, Suite 1500
Toronto, ON, M5C 3G5

David T. Ullmann (LSO # 423571)
Tel: (416) 596-4289
Email: dullmann@blaney.com

Birpal Benipal (LSO # 89984B)
Tel: (437) 890-9324
Email: bbenipal@blaney.com

Lawyers for the Respondents, 1680 Brimley Limited
Partnership, 2808908 Ontario Inc., & Brimley Progress
Developments Inc.

To: The Service List

INDEX

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

B E T W E E N:

UBC SOLUTIONS INCORPORATED

Applicant

- and -

**1680 BRIMLEY LIMITED PARTNERSHIP, 2808908 ONTARIO INC. and BRIMLEY
PROGRESS DEVELOPMENTS INC.**

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

INDEX

Tab	Document	Page #
1	Non-Confidential Supplementary Affidavit of Hans Jain sworn July 20 th , 2026	1-2
A	Confidential Exhibit “A” – Reporting Letter from Colliers Canada	3
B	Confidential Exhibit “B” – Reporting Letter from Avison Young	4

TAB 1

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

B E T W E E N:

UBC SOLUTIONS INCORPORATED

Applicant

- and -

**1680 BRIMLEY LIMITED PARTNERSHIP, 2808908 ONTARIO INC. and BRIMLEY
PROGRESS DEVELOPMENTS INC.**

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

**NON-CONFIDENTIAL SUPPLEMENTARY RESPONDING AFFIDAVIT OF HANS
JAIN**

I, **Hans Jain**, of the City of Toronto, in the Province of Ontario, **AFFIRM THAT:**

1. I am the sole director of 2808908 Ontario Inc. (“**280**”) and Brimley Progress Developments Inc. (the “**Nominee**” and together with 1680 Brimley Limited Partnership (“**1680**”) collectively referred hereto as the “**Respondents**”), and as such, I have knowledge of the matters herein deposed.
2. I provide this affidavit as a supplement to my affidavit sworn on July 17th in this proceeding expressing, inter alia, my concerns about the motion being brought forward by TDB Restructuring Limited in its capacity as receiver of the Respondents (the “**Receiver**”).
3. Attached as **Confidential Exhibits “A” and “B”** respectfully are two reports, one from Colliers Project Consulting and Investment Group (“**Colliers**”) and one from Avison Young, Land

Services Group (“**Avison**”). Both entities are well known commercial real estate brokerages who, among other things, routinely engage in the marketing and sale of large real estate development projects such as the Brimley Project. Their respective credentials are set out in the Exhibits.

4. Given my concerns about the marketing undertaken to date by the Receiver, I reached out to each of these entities to ask that they provide these opinions to assist the Court in considering how a better sale process might be conducted.

5. I did not offer to either of Colliers or Avison the opportunity to sell the Brimley Project, since it is in receivership and that decision is up to the Court or the Receiver, but I believe they would both be interested in doing so if the Receiver or the Court accept my recommendation that CBRE be dismissed and a new agency engaged.

6. As these proposals contain important market information and opinions of value which might impact the sale of the property, it is my recommendation that these proposals be sealed. This affidavit will be served with the proposal redacted. An unredacted version will be served separately to the Court and the Receiver.

AFFIRMED REMOTELY BEFORE ME
by Hans Jain at the City of Toronto, in the
Province of Ontario, on this 20th day of July
2026, in accordance with *O. Reg. 431/20*,
Administering or Declaration Remotely.



Commissioner for Taking Affidavits
BIRPAL BENIPAL (LSO # 89984B)



Hans Jain (Jul 20, 2026 16:29:22 EDT)

HANS JAIN

TO BE SEALED

This is **CONFIDENTIAL** Exhibit “A” referred to in the Affidavit of Hans Jain of the City of Toronto, in the Province of Ontario, this 20th day of July 2026 in accordance with *O. Reg. 431/20, Administering or Declaration Remotely*



Commissioner for Taking Affidavits (or as may be)

BIRPAL BENIPAL (LSO # 89984B)

TO BE SEALED

This is **CONFIDENTIAL** Exhibit “B” referred to in the Affidavit of Hans Jain of the City of Toronto, in the Province of Ontario, this 20th day of July 2026 in accordance with *O. Reg. 431/20, Administering or Declaration Remotely*



Commissioner for Taking Affidavits (or as may be)

BIRPAL BENIPAL (LSO # 89984B)

UBC SOLUTIONS INCORPORATED

And

1680 BRIMLEY LIMITED PARTNERSHIP, et al.

Applicant

Respondents

Service: Service List

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at **TORONTO**

**NON-CONFIDENTIAL SUPPLEMENTARY
RESPONDING AFFIDAVIT OF HANS JAIN**

BLANEY MCMURTRY LLP

Lawyers

2 Queen Street East, Suite 1500

Toronto, ON, M5C 3G5

David T. Ullmann (LSO # 42357I)

Tel: (416) 596-4289

Email: dullmann@blaney.com

Birpal Benipal (LSO # 89984B)

Tel: (437) 890-9324

Email: bbenipal@blaney.com

Lawyers for the Respondents, 1680 Brimley Limited Partnership, 2808908 Ontario Inc. & Brimley Progress Developments Inc.

UBC SOLUTIONS INCORPORATED

And

1680 BRIMLEY LIMITED PARTNERSHIP, et al.

Applicant

Respondents

Service: Service List

ONTARIO
SUPERIOR COURT OF JUSTICE
Proceeding commenced at **TORONTO**

**NON-CONFIDENTIAL SUPPLEMENTARY
RESPONDING MOTION RECORD OF 1680
BRIMLEY LIMITED PARTNERSHIP, 2808908
ONTARIO INC. & BRIMLEY PROGRESS
DEVELOPMENTS INC.**
(Receiver's Sale Approval Hearing returnable on September
18th, 2026)

BLANEY MCMURTRY LLP
Lawyers
2 Queen Street East, Suite 1500
Toronto, ON, M5C 3G5

David T. Ullmann (LSO # 42357I)
Tel: (416) 596-4289
Email: dullmann@blaney.com

Birpal Benipal (LSO # 89984B)
Tel: (437) 890-9324
Email: bbenipal@blaney.com

Lawyers for the Respondents, 1680 Brimley Limited
Partnership, 2808908 Ontario Inc. & Brimley Progress
Developments Inc.