

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERICAL 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

AIDE MEMOIRE OF THE RECEIVER

1. TDB Restructuring Limited is the receiver of the property of the Respondents (in such capacity, the “**Receiver**”).
2. On September 18, 2026, the Receiver brought a motion for:
 - (a) Approval of its sales process;
 - (b) Payment of certain sums from a related party, Hansalex Corp. (“**Hansalex**”);
 - (c) Production of the Respondents’ books and records and access to servers;
 - (d) Approval of a lien claims process;
 - (e) Authorization for payment of certain unearned premiums;
 - (f) Approval of the Receiver’s reports;
 - (g) Approval of fees and disbursements;
 - (h) An increase in the Receiver’s borrowing charge; and

- (i) A sealing order.
- 3. The Respondents opposed the sales process, payment from Hansalex, access to servers, and approval of the reports and fees.
- 4. Following the hearing the Court scheduled a case conference for October 6, 2026, for the following:
 - (a) The Receiver and the Respondents were directed to work on a form of order relating to document production and access to servers which could be signed at the case conference; and
 - (b) The Receiver was to provide a list of questions to counsel for the Respondents regarding the payments to Hansalex by September 25, 2026. The timeline for responses would be addressed at the case conference.
- 5. The Receiver and the Respondents have discussed a form of document production order. The order has not been finalized because the proposed third party which will image the servers and review them for privileged documents has not provided a quotation for the work. Before providing a quotation, information is required from the Respondents regarding the volume of information to be imaged and reviewed. The Receiver is waiting for the Respondents to provide this information.
- 6. The Receiver and the Respondents may require additional time to finalize the document production order given the delay in obtaining a quotation.
- 7. The Receiver delivered the list of questions to the Respondents on September 25, 2026. The Receiver requires a timeline for the Respondents to respond to the request for information regarding Hansalex.

8. The Receiver has prepared a further supplementary report to address criticisms of the sales process in detail. The Receiver plans to deliver this report prior to the October 6, 2026, case conference.

October 5, 2026

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**Lawyers for the Receiver,
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Applicant

-and-

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Court File No. CV-25-00740765-00CL

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PROCEEDING COMMENCED AT
TORONTO

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