

Court File No. CL-25-00753591-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

**RPN FINANCE CORP., PETER JEEWAN, 2742695 ONTARIO INC.,
ROBERT PAULS, and JOSEPH BERLJAWSKY**

Applicants

and

**NORMANDY 293 MAPLEHURST INC., NORMANDY 295 MAPLEHURST
INC., 288 SHEPPARD INC., 2646214 ONTARIO LTD. and NAWAR
MAHFOOTH**

Respondents

**APPLICATION UNDER SUBSECTION 243(1) OF THE BANKRUPTCY AND
INSOLVENCY ACT, R.S.C. 1985, AS AMENDED, AND SECTION 101 OF THE
COURTS OF JUSTICE ACT, R.S.O. 1990, C.C.43, AS AMENDED**

REPLY RECORD

**(Application for Receivership Order,
returnable January 6, 2026)**

December 19, 2025

**RSG LAW
PROFESSIONAL CORPORATION**
6605 Hurontario Street, Suite 400
Mississauga, Ontario L5T 0A3

Raj Grewal (LSO#: 65524T)
raj@rsglaw.ca
Tel: 905-799-0925

Raghav Vig (LSO#90983F)
raghav@rsglaw.ca
Tel: 905-799-0925

Lawyers for the Applicant

TO: SERVICE LIST

SERVICE LIST
(As of December 19, 2025)

Applicant	
<p>RSG Law Professional Corporation 400-6605 Hurontario Street Mississauga, ON L5T 0A3</p> <p>Counsel to the Applicants</p>	<p>Raj Grewal (LSO#: 65524T) Tel: 905-799-0925 Email: raj@rsqlaw.ca</p> <p>Raghav Vig (LSO#: 90983F) Tel: 905-799-0925 Email: raghav@rsqlaw.ca</p>
Proposed Receiver	
<p>TDB Restructuring Limited 11 King Street West, Suite 700 Toronto, ON M5H 4C7</p> <p>Proposed Receiver</p>	<p>Bryan Tannenbaum Tel: (416) 238-5055 Email: btannenbaum@tdbadvisory.ca</p> <p>Jeffrey Berger Tel: (647) 726-0496 Email: jberger@tdbadvisory.ca</p>
<p>Chaitons LLP 5000 Yonge Street, 10th Floor Toronto, ON M2N 7E9</p> <p>Counsel to the Proposed Receiver</p>	<p>Maya Poliak (LSO No 54100A) Tel: (416) 218-1161 Email: maya@chaitons.com</p>
Respondents	
<p>Normandy 293 Maplehurst Inc. 60 Lacoste Boulevard, Suite 201, Brampton, ON L6P 2K2</p>	<p>BE LAW LLP Suite 700 - 30 St. Patrick Street Toronto, ON M5T 3A3</p> <p>Sara J. Erskine (LSO #: 46856G) Email: sara@be-law.ca Tel: 416-597-5408</p> <p>Jared S. Rosenbaum (LSO #: 74769U) Email: jared.rosenbaum@be-law.ca Tel: 647-556-7992</p>
<p>Normandy 295 Maplehurst Inc. 60 Lacoste Boulevard, Suite 201, Brampton, ON L6P 2K2</p>	
<p>288 Sheppard Inc. 3173 Trailside Drive, Oakville, ON L6M 0P3</p>	

2646214 Ontario Ltd. 3173 Trailside Drive, Oakville, ON L6M 0P3	Lawyers for the Respondents, Normandy 293 Maplehurst Inc., Normandy 295 Maplehurst Inc., 288 Sheppard Inc., 2646214 Ontario Ltd. and Nawar Mahfooth
Nawar Mahfooth 60 Lacoste Boulevard, Suite 201, Brampton, ON L6P 2K2	
Minister of National Revenue	
Attorney General of Canada Department of Justice Canada Ontario Regional Office 120 Adelaide Street West, Suite 400 Toronto, ON M5H 1T1 Fax: 416-973-0942	General Intake for Department of Justice - AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca
Ministry of Finance	
Ministry of Finance 6th Floor 33 King St. W. Oshawa, ON L1H 8H5	Steven Groeneveld Counsel, Legal Services Branch, Ministry of Finance, Civil Law Division, Ministry of the Attorney General Ontario Public Service Tel: 905-431-8380 Email: steven.groeneveld@ontario.ca
Insolvency Unit Ministry of Finance 6th Floor 33 King St. W. Oshawa, ON L1H 8H5	Email: insolvency.unit@ontario.ca
Other Creditors	
Aarti Real Estate Enterprises Inc., 22 Kelways Cir, Brampton, ON L6T 0G6	
Mayuri Ventures Inc., 3525 Palgrave Road, Mississauga, ON L5B 1W1	
Sarmad Ganni, 60 Lacoste Boulevard, Suite 201,	

Brampton, ON L6P 2K2	
1842716 Ontario Inc. , 2939 Portland Drive, Unit 200, Oakville, ON L6H 5S4	
Addison Wealth Management Inc. , 33 Balfour Drive, Hamilton, ON L9C 7A5	
The Bank of Nova Scotia 10 Wright Boulevard Stratford, ON N5A 7X9	
Scalzi Caplan LLP 3100 Rutherford Road, Unit 105 Vaughan, ON L4K 0G6 Derek Ketelaars (LSO# 67154R) Tel: (437) 242-4088 E: derek@sclawpartners.com	

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**ONTARIO
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B E T W E E N:

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Applicants

and

**NORMANDY 293 MAPLEHURST INC., NORMANDY 295 MAPLEHURST
INC., 288 SHEPPARD INC., 2646214 ONTARIO LTD. and NAWAR
MAHFOOTH**

Respondents

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Tab Document

1 Reply Affidavit of Mayer Michalowicz, sworn December 19, 2025

Exhibit "A" – Notice for Attornment of Rents

TAB 1

Court File No. CL-25-00753591-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

**RPN FINANCE CORP., PETER JEEWAN, 2742695 ONTARIO INC.,
ROBERT PAULS, and JOSEPH BERLJAWSKY**

Applicants

and

**NORMANDY 293 MAPLEHURST INC., NORMANDY 295 MAPLEHURST
INC., 288 SHEPPARD INC., 2646214 ONTARIO LTD. and NAWAR
MAHFOOTH**

Respondents

REPLY AFFIDAVIT OF MAYER MICHALOWICZ SWORN DECEMBER 19, 2025

I, Mayer Michalowicz, of the city of Hamilton, in the province of Ontario, MAKE
OATH AND SAY:

1. I swear this reply affidavit in support of the receivership application of RPN Finance Corp., Peter Jeewan, 2742695 Ontario Inc., Robert Pauls, and Joseph Berljawsky (the "**Applicants**"), described more fully in the affidavit that I previously swore in this proceeding on November 11, 2025. Unless otherwise indicated, capitalized terms used in this reply affidavit and not otherwise defined shall have the meanings given to them in my April 28 affidavit.
2. I have reviewed the Affidavit of Sarmad Ganni, sworn December 12, 2025, and the Affidavit of Nawar Mahfooth, sworn December 12, 2025.

- 3. In response to paragraph 20 of the Affidavit of Sarmad Ganni, the rent for 288 Sheppard is being collected by a related entity, Addison Wealth Management Inc., which is not the same as the second mortgagee 280 and 288 Sheppard. 288 Sheppard is leased out to commercial tenant, Rexall/ Pharma Plus Pharmacies Ltd. with the monthly gross rent of \$49,531.66. After deducting the property tax and HST, the net monthly rent of \$32,083.33 is being applied towards the mortgage of Addison Wealth Management Inc.
- 4. The Applicants have issued Notices for Attornment of Rents to the tenants at the remaining properties. Annexed hereto and marked as Exhibit-A are true copies of the notices.
- 5. The Respondents have not made any payments towards the Mortgages.

Sworn remotely by Mayer Michalowicz
 before me at the city of Mississauga,
 in the province of Ontario on this 19 day
 of December 2025 in accordance with
 O. Reg 431/20, Administering Oath
 or Declaration Remotely


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)
)
)

Mayer Michalowicz

 A Commissioner for Taking Affidavits, etc.
Raghav Vig (LSO# 90983F)

This is Exhibit "A" referred to
in the Affidavit of Mayer Michalowicz
Sworn before me on the 19th day of December,

2025



A Commissioner for taking Affidavits

Raghav Vig (LSO#90983F)

**RSG LAW**

6605 Hurontario Street,
Suite 400
Mississauga, ON L5T 0A3

Raghav Vig

T: 905 799 0925

F: 1.866.570.0633

E: raghav@rsglaw.ca

DATE: December 12, 2025

TO: **The Tenant(s)**
280 Sheppard Avenue East,
North York, ON M2N 3B1

RE: Lease Agreement regarding 280 Sheppard Avenue East (the
“**Property**”)

TAKE NOTICE that default has been made in payment of the moneys due under a charge/mortgage between 2646214 Ontario Ltd. (the “**Mortgagor**” or “**Landlord**”) and Robert Pauls, RPN Finance Corp. and 2742695 Ontario Inc. (the “**Mortgagee**”) upon the Property.

The Mortgagee has exercised its rights and remedies under the mortgage including the assignment of rents, and

YOU ARE HEREBY notified that all rent and other amounts payable under your Lease is to be paid to the Mortgagee as set out below.

Effective December 8, 2025, and until you receive written notice to the contrary from the Mortgagee:

- The Tenant shall attorn to the Mortgagee as its Landlord for the purposes of making all payments due under the Lease, without prejudice to any rights the Tenant may have against the Landlord or any other person.
- All rent and additional rent, and any other sums payable by the Tenant under the Lease, shall be paid directly to the Mortgagee as follows:

Payee: RSG Law Professional Corporation, In Trust

Address: 6605 Hurontario Street, Suite 400, Mississauga, ON L5T 0A3

Electronic Payment Details:

Bank: TD Canada Trust

Account Number: 5067202 (15975067202 for wires)

Transit No.: 15972

Branch Address: 7060 McLaughlin Road, Mississauga, ON L5W 1W7

Institution No.: 004

SWIFT Code: TDOMCATTOR

- Payment of rent and other sums to the Mortgagee in accordance with this Notice will, to the extent of such payment, constitute good and sufficient discharge of the Tenant's obligations to pay rent under the Lease.

Except as expressly set out in this Notice:

- This Notice does not alter, vary, amend, or waive any of the terms of the Lease; and
- All other rights and obligations of the Tenant under the Lease remain in full force and effect.

If any rent or other amounts under the Lease are presently outstanding, you are directed not to make any payment to the Landlord but instead to contact our office immediately so that we can confirm:

- the amount of arrears (if any), and
- the schedule and method of payment of such arrears and future rent to the Mortgagee.

Any rent inadvertently paid to the Landlord after the effective date of this Notice will not discharge the Tenant's obligations to the Mortgagee.

Sincerely,

RSG LAW



Raghav Vig

**RSG LAW**

6605 Hurontario Street,
Suite 400
Mississauga, ON L5T 0A3

Raghav Vig

T: 905 799 0925

F: 1.866.570.0633

E: raghav@rsglaw.ca

DATE: December 12, 2025

TO: **Carlos Salodato**
287 Maplehurst Avenue,
Toronto ON M2N 3C5

RE: Lease Agreement regarding 287 Maplehurst Avenue
(the "**Property**")

TAKE NOTICE that default has been made in payment of the moneys due under a charge/mortgage between Nawar Mahfooth (the "**Mortgagor**" or "**Landlord**") and Joseph Berljawsky (the "**Mortgagee**") upon the Property.

The Mortgagee has exercised its rights and remedies under the mortgage including the assignment of rents, and

YOU ARE HEREBY notified that all rent and other amounts payable under your Lease is to be paid to the Mortgagee as set out below.

Effective December 8, 2025, and until you receive written notice to the contrary from the Mortgagee:

- You (the "**Tenant**") shall attorn to the Mortgagee as its Landlord for the purposes of making all payments due under the Lease, without prejudice to any rights the Tenant may have against the Landlord or any other person.
- All rent and additional rent, and any other sums payable by the Tenant under the Lease, shall be paid directly to the Mortgagee as follows:

Payee: RSG Law Professional Corporation, In Trust

Address: 6605 Hurontario Street, Suite 400, Mississauga, ON L5T 0A3

Electronic Payment Details:

Bank: TD Canada Trust

Account Number: 5067202 (15975067202 for wires)

Transit No.: 15972

Branch Address: 7060 McLaughlin Road, Mississauga, ON L5W 1W7

Institution No.: 004

SWIFT Code: TDOMCATTOR

- Payment of rent and other sums to the Mortgagee in accordance with this Notice will, to the extent of such payment, constitute good and sufficient discharge of the Tenant's obligations to pay rent under the Lease.

Except as expressly set out in this Notice:

- This Notice does not alter, vary, amend, or waive any of the terms of the Lease; and
- All other rights and obligations of the Tenant under the Lease remain in full force and effect.

If any rent or other amounts under the Lease are presently outstanding, you are directed not to make any payment to the Landlord but instead to contact our office immediately so that we can confirm:

- the amount of arrears (if any), and
- the schedule and method of payment of such arrears and future rent to the Mortgagee.

Any rent inadvertently paid to the Landlord after the effective date of this Notice will not discharge the Tenant's obligations to the Mortgagee.

Sincerely,

RSG LAW



Raghav Vig

**RSG LAW**

6605 Hurontario Street,
Suite 400
Mississauga, ON L5T 0A3

Raghav Vig

T: 905 799 0925

F: 1.866.570.0633

E: raghav@rsglaw.ca

DATE: December 12, 2025

TO: **Weimeng Ding**
293 Maplehurst Avenue,
North York, ON M2N 3C5

AND TO: **Anita Soltanian**
293 Maplehurst Avenue,
North York, ON M2N 3C5

RE: Lease Agreement regarding 293 Maplehurst Avenue
(the "**Property**")

TAKE NOTICE that default has been made in payment of the moneys due under a charge/mortgage between Normandy 293 Maplehurst Inc. (the "**Mortgagor**" or "**Landlord**") and Peter Jeewan and RPN Finance Corp. (the "**Mortgagee**") upon the Property.

The Mortgagee has exercised its rights and remedies under the mortgage including the assignment of rents, and

YOU ARE HEREBY notified that all rent and other amounts payable under your Lease is to be paid to the Mortgagee as set out below.

Effective December 8, 2025, and until you receive written notice to the contrary from the Mortgagee:

- You (the "**Tenant**") shall attorn to the Mortgagee as its Landlord for the purposes of making all payments due under the Lease, without prejudice to any rights the Tenant may have against the Landlord or any other person.
- All rent and additional rent, and any other sums payable by the Tenant under the Lease, shall be paid directly to the Mortgagee as follows:

Payee: RSG Law Professional Corporation, In Trust

Address: 6605 Hurontario Street, Suite 400, Mississauga, ON L5T 0A3

Electronic Payment Details:

Bank: TD Canada Trust

Account Number: 5067202 (15975067202 for wires)

Transit No.: 15972

Branch Address: 7060 McLaughlin Road, Mississauga, ON L5W 1W7

Institution No.: 004

SWIFT Code: TDOMCATTOR

- Payment of rent and other sums to the Mortgagee in accordance with this Notice will, to the extent of such payment, constitute good and sufficient discharge of the Tenant's obligations to pay rent under the Lease.

Except as expressly set out in this Notice:

- This Notice does not alter, vary, amend, or waive any of the terms of the Lease; and
- All other rights and obligations of the Tenant under the Lease remain in full force and effect.

If any rent or other amounts under the Lease are presently outstanding, you are directed not to make any payment to the Landlord but instead to contact our office immediately so that we can confirm:

- the amount of arrears (if any), and
- the schedule and method of payment of such arrears and future rent to the Mortgagee.

Any rent inadvertently paid to the Landlord after the effective date of this Notice will not discharge the Tenant's obligations to the Mortgagee.

Sincerely,

RSG LAW



Raghav Vig

**RSG LAW**

6605 Hurontario Street,
Suite 400
Mississauga, ON L5T 0A3

Raghav Vig

T: 905 799 0925

F: 1.866.570.0633

E: raghav@rsglaw.ca

DATE: December 12, 2025

TO: **The Tenant**
294 Sheppard Avenue East,
North York, ON M2N 3B1

RE: Lease Agreement regarding 294 Sheppard Avenue East
(the "**Property**")

TAKE NOTICE that default has been made in payment of the moneys due under a charge/mortgage between 288 Sheppard Inc. (the "**Mortgagor**" or "**Landlord**") and Robert Pauls (the "**Mortgagee**") upon the Property.

The Mortgagee has exercised its rights and remedies under the mortgage including the assignment of rents, and

YOU ARE HEREBY notified that all rent and other amounts payable under your Lease is to be paid to the Mortgagee as set out below.

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- You (the "**Tenant**") shall attorn to the Mortgagee as its Landlord for the purposes of making all payments due under the Lease, without prejudice to any rights the Tenant may have against the Landlord or any other person.
- All rent and additional rent, and any other sums payable by the Tenant under the Lease, shall be paid directly to the Mortgagee as follows:

Payee: RSG Law Professional Corporation, In Trust
Address: 6605 Hurontario Street, Suite 400, Mississauga, ON L5T 0A3
Electronic Payment Details:
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Institution No.: 004
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- Payment of rent and other sums to the Mortgagee in accordance with this Notice will, to the extent of such payment, constitute good and sufficient discharge of the Tenant's obligations to pay rent under the Lease.

Except as expressly set out in this Notice:

- This Notice does not alter, vary, amend, or waive any of the terms of the Lease; and
- All other rights and obligations of the Tenant under the Lease remain in full force and effect.

If any rent or other amounts under the Lease are presently outstanding, you are directed not to make any payment to the Landlord but instead to contact our office immediately so that we can confirm:

- the amount of arrears (if any), and
- the schedule and method of payment of such arrears and future rent to the Mortgagee.

Any rent inadvertently paid to the Landlord after the effective date of this Notice will not discharge the Tenant's obligations to the Mortgagee.

Sincerely,

RSG LAW



Raghav Vig

**RSG LAW**

6605 Hurontario Street,
Suite 400
Mississauga, ON L5T 0A3

Raghav Vig

T: 905 799 0925

F: 1.866.570.0633

E: raghav@rsglaw.ca

DATE: December 12, 2025

TO: **Mahammad Goudarzi**
295 Maplehurst Avenue,
North York, ON M2N 3C5

RE: Lease Agreement regarding 295 Maplehurst Avenue
(the "**Property**")

TAKE NOTICE that default has been made in payment of the moneys due under a charge/mortgage between 288 Sheppard Inc. (the "**Mortgagor**" or "**Landlord**") and Robert Pauls (the "**Mortgagee**") upon the Property.

The Mortgagee has exercised its rights and remedies under the mortgage including the assignment of rents, and

YOU ARE HEREBY notified that all rent and other amounts payable under your Lease is to be paid to the Mortgagee as set out below.

Effective December 8, 2025, and until you receive written notice to the contrary from the Mortgagee:

- You (the "**Tenant**") shall attorn to the Mortgagee as its Landlord for the purposes of making all payments due under the Lease, without prejudice to any rights the Tenant may have against the Landlord or any other person.
- All rent and additional rent, and any other sums payable by the Tenant under the Lease, shall be paid directly to the Mortgagee as follows:

Payee: RSG Law Professional Corporation, In Trust

Address: 6605 Hurontario Street, Suite 400, Mississauga, ON L5T 0A3

Electronic Payment Details:

Bank: TD Canada Trust

Account Number: 5067202 (15975067202 for wires)

Transit No.: 15972

Branch Address: 7060 McLaughlin Road, Mississauga, ON L5W 1W7

Institution No.: 004

SWIFT Code: TDOMCATTOR

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Except as expressly set out in this Notice:

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- All other rights and obligations of the Tenant under the Lease remain in full force and effect.

If any rent or other amounts under the Lease are presently outstanding, you are directed not to make any payment to the Landlord but instead to contact our office immediately so that we can confirm:

- the amount of arrears (if any), and
- the schedule and method of payment of such arrears and future rent to the Mortgagee.

Any rent inadvertently paid to the Landlord after the effective date of this Notice will not discharge the Tenant's obligations to the Mortgagee.

Sincerely,

RSG LAW



Raghav Vig

RPN FINANCE CORP. et al.
Applicants

-and-

NORMANDY 293 MAPLEHURST INC. et al.
Respondents

Court File No. CL-25-00753591-0000

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

PROCEEDING COMMENCED AT
TORONTO

**AFFIDAVIT OF MAYER MICHALOWICZ SWORN
DECEMBER 19, 2025**

**RSG LAW
PROFESSIONAL CORPORATION**
6605 Hurontario Street, Suite 400
Mississauga, Ontario L5T 0A3

Raj Grewal (LSO#: 65524T)

raj@rsqlaw.ca

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Raghav Vig (LSO#90983F)

raghav@rsqlaw.ca

Tel: 905-799-0925

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-and-

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