

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

B E T W E E N:

CAMERON STEPHENS MORTGAGE CAPITAL LTD.

Applicant

and

ZONIX HOMES INC., ZONIX DUDLEY INC., DENIX CORPORATION,
PEJVAK GROUP LTD., DEZ BUILDING INC., LIFELONG SUPPORT
CORPORATION, PARADISE CO. INC., ELEVO CONSULTING GROUP
INC., DIBA PREMIER GROUP INC., HANNAH PREMIER GROUP INC.,
PRO VOLO INC., FARNA CORPORATION, and BEVERNIK LTD.

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**

AIDE MEMOIRE OF THE APPLICANT

(Scheduling Appointment before the Honourable Madam Justice Steele)

1. The moving party is the Applicant creditor, Cameron Stephens Mortgage Capital Ltd. (“**Cameron Stephens**”).
2. Cameron Stephens has commenced an Application for the Appointment of a Receiver over the assets of the Respondents which include real properties known municipally as 37-49 Highland Park Boulevard, Markham, Ontario (the “**Highland Properties**”) and 36-48 Steeles Avenue East, Markham, Ontario (the “**Steeles Properties**” and collectively, the “**Real Property**”). The Respondents, Zonix Homes Inc. and Zonix Dudley Inc. (collectively, the “**Borrowers**”) are

registered owners of the Real Property, who, together with the Non-Borrower Beneficial Owners (together with the Borrowers, the “**Debtors**”),¹ hold 100% beneficial interest in the Real Property.

3. Cameron Stephens is the second ranking secured creditor of the Borrowers. Vector Financial Services Limited and Olympia Trust Company (the “**Vector Creditors**”) hold the first ranking security interest over the Borrowers. The combined debt exceeds \$28,000,000.00.

4. The Cameron Stephens’ loan fell into default on or about April 1st, 2025. The default was followed by a Forbearance Agreement and an Accommodation Agreement, the terms of which expired on April 30th, 2026.

5. The Vector loan is also currently in default. Both Cameron Stephens and the Vector Creditors have made demands which have expired.

6. The Vector Creditors are in support of this Application to appoint a Receiver over the Debtors.

7. A hearing date is being sought for August 7th or 12th, 2026. A timetable has been agreed to with counsel for the Borrowers and the Zonix Guarantors² as follows:

- a. Application Record - June 23rd, 2026;
- b. Responding Record - July 2nd, 2026;
- c. Reply Record - July 10th, 2026;
- d. Cross-examinations, if any, week of July 13th, 2026;
- e. Applicant’s Factum - July 22nd, 2026;
- f. Responding Factum - July 29th, 2026; and
- g. Hearing date on either August 7th or 12th, 2026 subject to court availability. This matter should not be scheduled before Madame Justice Dietrich due to a judicial conflict.

¹ The Non-Borrower Beneficial Owners are comprised of 11 corporations as set out at paragraphs (i) to (s) of the Notice of Application.

² The Zonix Guarantors include four principals of the Borrowers, as set out at paragraph (y) of the Notice of Application

All of which is respectfully submitted.

June 9, 2026

Date



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CAMERON STEPHENS MORTGAGE
CAPITAL LTD.
Applicant

and

ZONIX HOMES INC., et al.
Respondents

Court File No. CL-26-00000255-0000

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