

District of: Ontario  
Division No. 09 - Toronto  
Court File No. CV-21-00664429-00CL

**Form 87**  
**Notice and Statement of the Receiver**  
(Subsections 245(1) and 246(1) of the Act)

**IN THE MATTER OF THE RECEIVERSHIP OF  
CERTUS AUTOMOTIVE INC.**

The receiver gives notice and declares that:

1. On the 25<sup>h</sup> day of June, 2021, Deloitte Restructuring Inc. (“**Deloitte**”) was appointed by Order of the Ontario Superior Court of Justice (the “**Appointment Order**”) as the receiver and manager (the “**Receiver**”) without security, of all of the assets, undertakings and properties of each of Certus Automotive Inc. (“**Certus Canada**” or the “**Company**”) and Keen Point International Inc. (together with the Company, the “**Debtors**”) acquired for, or used in relation to a business carried on by any of the Debtors, including all proceeds thereof (the “**Property**”), as described below:

<b>Description of the assets of Certus Canada</b>	<b>Net Book Value (*) as at March 31, 2021</b>
Intercompany receivable	\$28,203,433
Fixed assets	11,569,345
Accounts receivable	2,614,072
Inventory	1,166,055
Due from related party	913,588
Other assets	881,804
<b>Total</b>	<b>\$45,348,297</b>

(\*) Net book values of the assets set out above are based on preliminary financial information prepared and compiled by management of the Company as at March 31, 2021. The Receiver has not audited, reviewed, or otherwise attempted to verify the accuracy or completeness of the information and, accordingly, expresses no opinion or other form of assurance on the information contained herein.

2. As noted above, Deloitte became the Receiver by virtue of the Appointment Order of the Honorable Justice Conway of the Ontario Superior Court of Justice pursuant to pursuant to Section 243(1) of the *Bankruptcy and Insolvency Act* (Canada) and Section 101 of the *Courts of Justice Act*. A copy of the Appointment Order is available on the Receiver’s website at [www.insolvencies.deloitte.ca/en-ca/certus](http://www.insolvencies.deloitte.ca/en-ca/certus).
3. The Receiver commenced the exercise of its power in respect of that appointment on the 25<sup>th</sup> day of June, 2021.
4. The following information relates to the receivership.
  - a. Stated address of the Company: The registered office address for the Debtors is 3300 Bloor Street West, West Tower, Suite 510, Toronto, Ontario (the “**Registered Office**”). We understand the Debtors vacated these premises prior to the date of the Appointment Order.
  - b. Principal line of business: Tier II global automotive parts manufacturer and distributor
  - c. Location of business: Headquartered at the Registered Office in Toronto, the broader Certus group also conducted operations in Michigan, Texas, China, Mexico, and Germany.

- d. Amounts owed by the Company to each creditor who appear to hold a security interest on the property described above include:

<b>Secured Creditor</b>	<b>Amount owed</b>
The Toronto-Dominion Bank	CAD \$10,288,744
The Toronto-Dominion Bank	USD \$7,409,228
Export Development Canada	Unknown
FGI Worldwide LLC	Unknown
VW Credit Canada	Unknown
Robert G. Mollenhauer	Unknown
R. Mollenhauer Holdings I Inc.	Unknown
Michael James Prokopetz	Unknown
Eurochrome Inc.	Unknown

- e. A list of unsecured creditors based on the Company's books and records is attached to this Notice as **Schedule "A"**.
- f. The intended plan of action of the Receiver during the receivership, to the extent that such a plan has been determined, is as follows: engage with auctioneers and prospective purchasers to realize on the machinery and equipment, and take steps to realize on remaining assets such as accounts and related party receivables, residual parts and inventory, and other amounts recoverable in respect of the Debtors.
- g. Contact person for the Receiver:  
Stacey Greenbaum  
Deloitte Restructuring Inc.  
8 Adelaide Street West, Suite 200  
Toronto, ON M5H 0A9  
Telephone: 416-874-4320  
Fax: 416-601-6690  
Email: [sgreenbaum@deloitte.ca](mailto:sgreenbaum@deloitte.ca)

\* \* \*

Dated at the City of Toronto in the Province of Ontario, this 5<sup>th</sup> day of July, 2021.

**DELOITTE RESTRUCTURING INC.,**  
solely in its capacity as the Court-appointed Receiver and Manager  
of Certus Automotive Inc.  
and not in its personal or corporate capacity

Per: 

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Stefano Damiani, CPA, CA, CIRP, LIT  
Senior Vice-President

**Notice and Statement of the Receiver**  
**Schedule A - Listing of unsecured creditors**  
**of Certus Automotive Inc.**  
**as at May 31, 2021, Canadian Dollars\***  
unless otherwise stated

Accelerated Connections	1,933
Acuway Molds Limited	118,115
Aird & Berlis	3,068
Atotech De Mexico SA DE CV	1,229,568
Bennett Jones LLP	44,536
Best Services Intl Freight Ltd.	19,949
Bluestar Technology Co, Ltd	19,191
Cafo Inc.	580
Caft Global Services S.A De CV	1,571
Canada Life	2,502
Chiefmold USA, Inc. San Diego	135,439
Conway MacKenzie, LLC	60,132
Corporacion Telch SA De CV	148,364
De Lage Landen Financial	180
Diagnostico Y Soluciones	1,932
Document Direction Limited	14
Element Material Technology Wixom	1,026
Elsyca Inc.	9,052
Envoy Express	65
Epicor Software Canada Ltd.	51,347
Factum Rechtsanwalte	1,152
Federal Express Canada Ltd.	1,473
G.E Forwarders (Warehouse) Inc.	726
G.E Forwarders Ltd.	2,952
Giarmarco, Mullins & Horton, P.C.	453
Grant Thornton Corporate Finance	36,124
Hangzhou Laiyuan Import	2,386,319
IHS Global Inc.	18,703
Key 2 Hosted Inc.	973
Megan MacKinnon	697
Moore Doeren Mayhew	49,543
Morgan Tecnica De Mexico SAPI	2,233
Ogletree Deakins International, LLP	8,153
Premold Precision Molds	22,792
QSSC SA DE CV	327,659
Qualita Global LLC	48,639
Rack Processing De Mexico S De	7,167
RBC Life Insurance Company	374
Rhenus Logistics S.A.	28,679
Ricoh Canada Inc.	214

**Notice and Statement of the Receiver**  
**Schedule A - Listing of unsecured creditors**  
**of Certus Automotive Inc.**  
**as at May 31, 2021, Canadian Dollars\***  
unless otherwise stated

Rowa Inc.	4,987
Shenzhen Hekeda Plating Equip.	442,070
Shibaura Machine Company, America	10,412
Shui Wang Technology Co., Ltd.	135,097
Sort and Rework	6,477
TA Services Inc.	3,488
Todini Atlantica S.A De C.V.	615,304
Toshiba Machine Co. America	318,111
Werner Global Logistics Mexico S de RL	120,370
Zhuhai Yonggang Plastic	239,280
Employees	To be determined
<b>Unsecured Creditors</b>	<b><u>6,689,184</u></b>
Certus Automotive S De RL DE CV	473,120
Certus Automotive, Inc.	4,415,080
Keen Point International Inc.	255,215
Keen Point International, Inc.	509,690
<b>Intercompany / Related Party Creditors</b>	<b><u>5,653,105</u></b>
<b>Total Unsecured Debt</b>	<b><u><u>12,342,289</u></u></b>

\* Amounts denominated in US Dollars have been converted at the foreign exchange rate of approximately \$1.21 CAD / USD