ONTARIO SUPERIOR COURT OF JUSTICE

BETWEEN:

RIVER CITY CHRISTIAN REFORMED CHURCH

Plaintiff

and

GRAHAM SINGH, PETER ELGERSMA, TRINITY CENTRES FOUNDATION, TRINITY CENTRES CAMBRIDGE, MILLER THOMSON LLP and COLDPOINT HOLDINGS LTD. CHRISTIAN REFORM CHURCH OF NORTH AMERICA - CANADA CORPORATION and CHRISTIAN REFORMED CHURCH EXTENSION FUND INC.

Defendants

SECOND SUPPLEMENT TO THE FIFTH REPORT OF DELOITTE RESTRUCTURING INC., IN ITS CAPACITY AS RECEIVER AND MANAGER

DATED JUNE 6, 2025

BACKGROUND AND PURPOSE

1. This Second Supplement is to be read as a further update to the Fifth Report of Deloitte Restructuring Inc., in its capacity as receiver and manager (in such capacity, the "Receiver") without security, of all of the assets, undertakings and properties of Trinity Centres Cambridge ("TCC") dated September 18, 2024 (the "Fifth Report"). Terms not otherwise defined herein as the meanings ascribed to them in the Fifth Report.

PAYMENTS OUTSTANDING

- 2. As set out in the Fifth Report, the TMI Order directed RCC to pay the disputed amount of \$52,977.84 to the Receiver in addition to the amounts that RCC did not dispute and which at the time were also unpaid totaling \$11,116.68. RCC was also ordered to pay costs to the Receiver in the amount of \$18,000 forthwith in accordance with the Cost Award dated May 11, 2023 and received on October 25, 2023.
- 3. The total ordered by the Court to be paid by RCC to the Receiver is \$82,094.52. As set out in the Fifth Report, RCC made small and sporadic payments to the Receiver since 2023 totalling \$61,831.07 leaving \$20,263.45 unpaid. As set out in the Supplement to the Fifth Report dated March 24, 2025, RCC made further payments to the Receiver of \$4,000, leaving \$16,263.45 unpaid. On or about May 29, 2025, RCC made a further payment to the Receiver in the amount of \$9,146.14.
- 4. As of June 6, 2025, RCC continues to owe \$7,117.31 in respect of the TMI Order and the Cost Award plus interest since the issuance of the Orders pursuant to the *Courts of Justice Act* (Ontario) totalling \$1,888.55 for a total amount owing of \$9,005.86.

RECOMMENDATIONS

74. For the reasons set out above, the Receiver continues to support the motion by the Defendants for security for costs.

All of which is respectfully submitted at Toronto, Ontario this 6th day of June, 2025.

DELOITTE RESTRUCTURING INC.,

solely in its capacity as the Court-appointed Receiver and Manager of Trinity Centres Cambridge and not in its personal or corporate capacity

Per: _____

Toni Vanderlaan, CPA,CA, CIRP, CTP, LIT

Senior Vice-President

Handerlaan

IN THE MATTER OF Section 101 of the *Courts of Justice Act*, R.S.O. 1990 c.C.43, as amended, and in the matter of Section 243(1) of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended

COLDPOINT HOLDINGS LTD.

and

TRINITY CENTRES CAMBRIDGE

Applicant

Respondents

Court File No. CV-21-00000281-0000

ONTARIO SUPERIOR COURT OF JUSTICE (COMMERCIAL LIST)

Proceeding commenced at Kitchener, Ontario

SUPPLEMENT TO THE FIFTH REPORT OF DELOITTE RESTRUCTURING INC.IN ITS CAPACITY AS COURTAPPOINTED RECEIVER AND MANAGER

MARCH 24, 2024

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